

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR**  
**AT CAMP COURT D.I.KHAN**

Service Appeal No. 121/2019

Date of Institution ... 28.01.2019

Date of Decision... 30.09.2022

Muhammad Zubair Mughal S/O Abdul Hameed Mughal Naib Qasid GGMS  
Basti Dhapan Wali, D.I.Khan.

... (Appellant)

**VERSUS**

The Government of Khyber Pakhtunkhwa through Secretary Elementary and  
Secondary Education Peshawar and 03 others.

... (Respondents)

MR. PIR GHULAM MARWAT,  
Advocate

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For appellant.

MR. ASIF MASOOD ALI SHAH,  
Deputy District Attorney

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For respondents.

KALIM ARSHAD KHAN  
MR. SALAH-UD-DIN

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CHAIRMAN  
MEMBER (JUDICIAL)

**JUDGMENT:**

SALAH-UD-DIN, MEMBER:- Precisely stated the facts giving rise to filing of the instant service appeal are that the appellant was appointed as Naib Qasid and was posted at GGMS Hissam vide appointment order dated 23.08.2014. During the course of service, the appellant was transferred to GGMS Basti Dhapanwali, D.I.Khan vide order dated 29.08.2015. District Education Officer (Female) Dera Ismail Khan issued letter No. 6050 dated 23.04.2016 to the District Accounts officer Dera Ismail Khan, whereby an amount of



Rs. 110554/- at the rate of 2000/- per month was ordered to be recovered from the appellant on account of his absence from duty. The appellant challenged the same through filing of departmental appeal, however the same remained unfruitful, therefore, the appellant has now approached this Tribunal through filing of instant service appeal.

2. Notices were issued to the respondents, who submitted their comments, wherein they denied the assertions made by the appellant in his appeal.

3. Learned counsel for the appellant has argued that the appellant had performed his duty regularly and did not remain absent from duty; that the appellant has been held to have remained absent from duty for 08 months, however the exact date, month and year of his absence have not at all been mentioned in the impugned order, which clearly shows that the same is based on mala-fide; that no disciplinary action has been taken against the appellant under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 and vague order of recovery was passed wrongly and illegally, therefore, the same is liable to be set-aside.

4. On the other hand, learned Deputy District Attorney for the respondents has argued that the appellant had not performed duty for a period of 08 months and had received salaries without performing any duty, therefore, the competent Authority has rightly passed order for recovery of an amount of Rs. 110554/- from the appellant; that the

order of recovery of an amount of Rs. 110554/- from the appellant has been passed after observing all legal and codal formalities; that the order of recovery of salaries was passed on 23.04.2016, which has not been challenged by the appellant within prescribed period of limitation and his appeal is thus liable to be dismissed on the ground of limitation alone.

5. We have heard the arguments of learned counsel for the parties and have perused the record.

6. A perusal of the record would show that letter No. 6050 dated 23.04.2016 was sent by the District Education Officer (Female) Dera Ismail Khan to District Accounts Officer Dera Ismail Khan, asking him to recover an amount of Rs. 110554/- from the salary of the appellant at the rate of Rs. 2000/- per month with effect from 01.04.2016. Similarly, an entry in this respect was also made in the service book of the appellant. The order of recovery of an amount of Rs. 110554/- was passed on the ground that the appellant had remained absent from duty for 08 months but had received salaries during the period of his absence. On scanning of the whole record, we have been unable to find out the date, month and year during which the appellant had remained absent from duty. In the letter dated 23.04.2016, addressed to the District Accounts Officer Dera Ismail Khan, it has though been mentioned that the absence period was noted against each of the Class-IV employees mentioned in the said list, however no period of absence has been mentioned in the said letter. Moreover, in case of absence from duty, the competent Authority was required to have

initiated disciplinary action against the appellant under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, however no such procedure has been adopted by the competent Authority. Record also does not show that even any fact finding inquiry was conducted against the appellant in the matter. On perusal of the available record, we have come to the conclusion that there exist no legal justification for recovery of amount of Rs. 110554/- from the appellant.

7. So far as the question of limitation is concerned, the issue being one of financial nature is not hit by bar of limitation. Even otherwise too, in view of peculiar facts and circumstances of the case, it would be highly unjustifiable to deny the right of the appellant merely on technical ground of limitation.

8. In view of the above discussion, the impugned order stands set-aside and the appeal in hand is allowed as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
30.09.2022



(KALIM ARSHAD KHAN)  
CHAIRMAN  
CAMP COURT D.I.KHAN



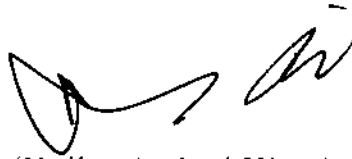
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT D.I.KHAN

ORDER  
30.09.2022

Learned counsel for the appellant present. Dr. Muhammad Imran, Senior Subject Specialist alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the impugned order stands set-aside and the appeal in hand is allowed as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
30.09.2022



(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan



(Salah-Ud-Din)  
Member (Judicial)  
Camp Court D.I.Khan

28<sup>th</sup> June 2022

Learned counsel for the appellant present: Mr. Muhammad Adeel Butt, Addl: AG alongwith Dr. Imran Shah, Litigation Officer for respondents present.

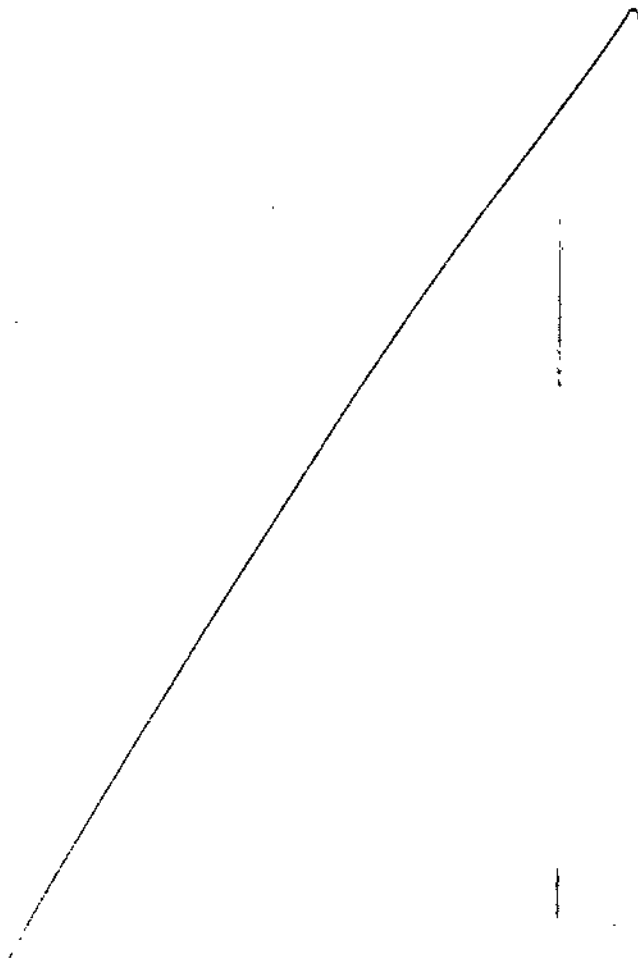
Written reply/comments on behalf of respondent No. 3 and 4 have already been submitted. To come up for arguments on 29.07.2022 before D.B at camp court D.I.Khan.



(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan

29/7/2022

Due to summer vacation  
come up 30/07/2022



25.01.2022

Tour is cancelled, therefore, case is adjourned to 26.05.2022 for the same as before.


  
Reader.

26.05.2022 <sup>R</sup>

Appellant in person present. Mr. Farhaj Sikandar, District Attorney present. None present on behalf of respondents No. 1 to 4.

Reply/comments on behalf of respondents are still awaited.

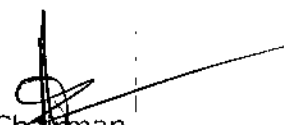
Previous date was changed on Reader Note, therefore, notice be issued to respondents through registered post and last chance given for submission of reply/comments. In case the last chance as given is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant, failing which the case shall be fixed before D.B for arguments without reply/comments deeming the same as waived off by the respondents. Adjourned. To come up for submission of written reply/comments on behalf of respondents on 28.06.2022 before the S.B at Camp Court D.I.Khan.

  
(Salah-Ud-Din)  
Member (J)  
Camp Court D.I.Khan

23.11.2021

Appellant in person and Mr. Muhammad Rasheed, DDA present. No representative of the respondents No. 1, 2, 3, ~~4~~ 5 is available. Fresh notices be issued to them for submission of written reply/comments on next date as last chance. Case to come up on 25.01.2022 before S.B at camp court, D.I.Khan.

In case the last chance as given above is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant failing which the case shall be fixed before D.B for arguments without reply/comments deeming the same as waived off by the said respondents.

  
Chairman  
Camp Court, D.I.Khan

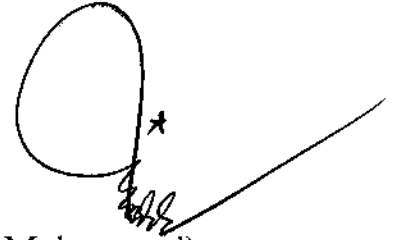


25.03.2021

Appellant with counsel present. Mr. Muhammad Rashid, DDA for respondents present.

Written reply/comments not submitted. Notices be issued to the respondents for submission of written reply/comment on amended appeal.

Adjourned to 21.06.2021 before S.B at camp court D.I.Khan.



(Mian Muhammad)  
Member(E)  
Camp Court D.I.Khan

21.06.21

*Due to COVID 19, the date is adjourned to 25.10.21 for same.*



25.10.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney for respondents present.

Written reply on behalf of respondents No.1 to 3 & 5 is still awaited. Preceding date was adjourned on a Reader's note, therefore, notice be issued to respondents by way of last chance to submit reply/comments. To come up for written reply/comments on 23.11.2021 before S.B at Camp Court, D.I.Khan.



(Rozina Rehman)  
Member(J)  
Camp Court, D.I.Khan

23.11.2020

Appellant present through counsel.

Muhammad Jan learned Deputy District Attorney for respondents present.

An application was submitted on behalf of appellant seeking amendment to the extent that impugned order dated 23.04.2016 may please be included in the main appeal. Reasons advanced seem to be genuine, hence, application is allowed and file to come up for submission of amended appeal on 25.11.2020 before D.B at Camp Court D.I.Khan.

(Atiq-ur-Rehman Wazir)  
Member (E)  
Camp Court, D.I Khan

(Rozina Rehman)  
Member (J)  
Camp Court, D.I Khan

25.11.2020

Appellant present through counsel.

Muhammad Jan learned Deputy District Attorney for respondents present.

Amended appeal submitted. To come up for reply/comments on 27.01.2021 before S.B at Camp Court, D.I.Khan.

(Atiq-ur-Rehman Wazir)  
Member (E)  
Camp Court, D.I Khan

(Rozina Rehman)  
Member (J)  
Camp Court, D.I Khan

27.1.2021

*Due to COVID 19, the case is adjourned to 25.3.2021 for the same.*

*(Signature)*

24/3/2020

Due to COVID-19 the case is adjourned. To come up for the same 20/4/2020 at Camp Court, D.I Khan

  
Reader

20/4/2020

Due to COVID-19 the case is adjourned. To come up for the same 21/4/2020 at Camp Court, D.I Khan

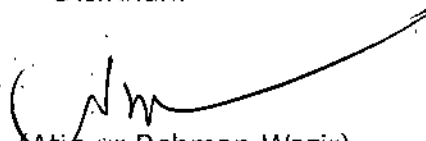
  
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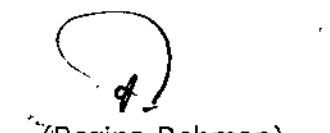
21.09.2020

Appellant with counsel present.

Mr. Usman Ghani learned District Attorney for respondents present.

A miscellaneous application for placing on record the impugned order date d23.06.2016 was submitted, copy whereof was served upon learned District Attorney. To come up for further proceedings/arguments on 23.11.2020 before D.B at Camp Court, D.I.Khan.

  
(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, D.I.Khan

  
(Rozina Rehman)  
Member (J)  
Camp Court, D.I.Khan

21/10/2019

Since tour to D.I.Khan has been cancelled .To come for the same on 26/11/2019.

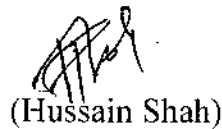


Reader

26.11.2019

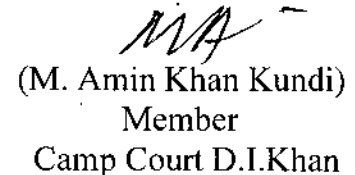
Appellant alongwith his counsel and Mr. Ziaullah, Deputy District Attorney for the respondents present.

The appellant has challenged the impugned order dated 20.04.2016 available on the copy of service book whereby the respondent-department has ordered for deduction of Rs. 110554/- for a period of eight months absence from the appellant but it is not transpired from the record that for which period the appellant was allegedly absence from duty, therefore, respondents are directed to direct the representative to attend the court and furnish record of attendance register of the appellant. Case to come up for record and arguments on 28.01.2020 before D.B at Camp Court D.I.Khan.



(Hussain Shah)

Member  
Camp Court D.I.Khan



(M. Amin Khan Kundi)

Member  
Camp Court D.I.Khan

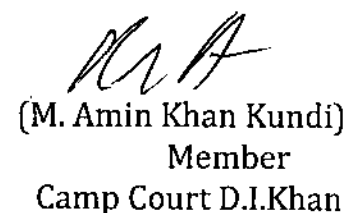
28.01.2020

Appellant in person and Mr. Usman Ghani, District Attorney for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 24.03.2020 for record mentioned in order sheet dated 26.11.2019 and arguments before D.B at Camp Court D.I.Khan.



(Hussain Shah)

Member  
Camp Court D.I.Khan

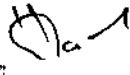


(M. Amin Khan Kundi)

Member  
Camp Court D.I.Khan

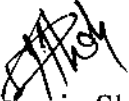
24.04.2019


Learned counsel for the appellant and Mr. Farhaj Sikandar learned District Attorney alongwith Dr. Imran Ali Shah Subject Specialist present. Written reply submitted. To come up for rejoinder, if any, and arguments on 24.06.2019 before D.B at Camp Court, D.I.Khan.

  
Member  
Camp Court, D.I.Khan.

24.06.2019

Counsel for the appellant and Mr. Farhaj Sikandar, District Attorney for the respondents present. Learned District Attorney requested for adjournment on the ground that the respondent-department has not provided him the relevant record of the present case. Adjourned to 23.09.2019 for rejoinder and argument before D.B at Camp Court D.I.Khan.

  
(Hussain Shah)  
Member  
Camp Court D.I.Khan

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court D.I.Khan

23.09.2019

Appellant in person present. Mr. Farhaj Sikandar, DDA for respondents present. Appellant seeks adjournment as his counsel is not available today due to general strike of the Bar. Adjourn. To come up for arguments on 21.10.2019 ~~on~~ before D.B at camp court D.I.Khan.

  
Member


  
Member  
Camp Court D.I.Khan

No. 121/2019

27.03.2019 Appellant in person and Mr. Farhaj Sikandar, District Attorney alongwith Muhammad Imran Shah, ADO and Rashid Muhammad, AAO for the respondents present.

Representative of respondent No. 4 has submitted reply while representative of respondents No. 1, 2 and 3 requests for further time to do the needful.

Adjourned to 22.04.2019 before S.B at camp court, D.I.Khan on which date the requisite reply shall positively be submitted.

  
Chairman  
Camp Court, D.I.Khan

22.04.2019 Appellant in person present. Written reply on behalf of respondents No.1 to 3 ~~present~~ is still awaited. Inayat Ullah Litigation Officer representative of the said respondents present and requested for time to submitted written reply/comments. Granted. To come up for written reply/comments on 24.04.2019 before S.B at Camp Court, D.I.Khan.

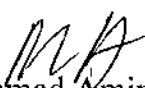
  
Member  
Camp Court, D.I.Khan.

27.02.2019

Counsel for the appellant Muhammad Zubair Mughal present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Naib Qasid in Government Girls Middle School Hassam D.I.Khan. It was further contended that the appellant was adjusted by the competent authority at Government Girls Middle School Basti Dhapan Wali D.I.Khan vide order dated 29.08.2015. It was further contended that in the month of April 2016, respondent-department has started deduction of Rs. 2000/- from the monthly salary of the appellant for the reason that the appellant has not performed duty from the first date of his appointment till the date of adjustment in the Government Girls Middle School Hassam. It was further contended that the appellant filed departmental appeal on 12.10.2018 which was not responded hence, the present service appeal on 28.01.2019. Learned counsel for the appellant further contended that the appellant has performed his duty and due to malafide the respondent-department has started deduction from the monthly salary of the appellant without any reason and show-cause notice therefore, the impugned order is illegal and liable to be set-aside. Learned counsel for the appellant further contended that there is some delay in filing of departmental appeal but the present service appeal pertain to money matter therefore, the appellant has got recurring cause of action and no limitation run against the money matter.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 27.03.2019 before S.B at Camp Court D.I.Khan. Learned counsel for the appellant also submitted application for suspension of deduction order. Notice of the same be also issued to the respondents for the date fixed. Status-quo be maintained till the date fixed.


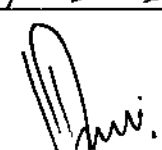
  
Appellant Deposited  
Security & Process Fee

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court D.I.Khan

**Form- A**  
**FORM OF ORDER SHEET**

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

Case No. 125/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/1/2019 -	<p>The appeal of Mr. Muhammad Zubair received today by post through Mr. Pir Ghulam Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 28/1/19</p> <p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>27.2.2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>

28/01/2019  
125/2019



**BEFORE THE HONOURABLE SERVICES  
TRIBUNAL KHYBER PAKHTUNKHWA,  
PESHAWAR.** Appeal No. 121/2019

**Mr. Muhammad Zubair N/Qasid GGMS Dhapanwali DIKhan  
(Appellant)**

**V/S**

Government of Khyber Pakhtunkhwa etc.

**(Respondents)**

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Yours Humble Appellant

Dated: 22/01/2019  
Mr. Muhammad Zubair Mughal

Through  
Counsel District bar  
Dera Ismail Khan  
22/01/19


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

Amended Appeal No. 121-P / 2019

Mr. Muhammad Zubair  
VS  
Govt. of KPK etc

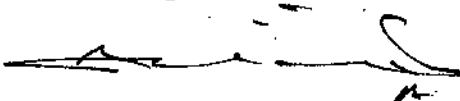
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Your Humble Petitioner

Mr. Muhammad Zubair  
Through counsels

Dated: 25/11/2020

  
**SARWAR KHAN KUNDI**  
Advocate High Court  
Dera Ismail Khan &

  
**FIR GHULAM KHAN MARWAT**  
Advocate, D.I. Khan

①

**AMMENDED APPEAL**  
**BEFORE THE HONORABLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUN KHAWA PESHAWAR**

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Service appeal NO\_\_121-P /2019

Mr. Muhammad Zubair Mughal S/O Abdul Hameed Mughal Naib Qasid GGMS Basti Dhapan  
Wali, DIKhan  
(Appellant)

Versus

1. The Govt: Of Khyber Pakhtunkhwa Through Secretary Elementary and Secondary Education Peshawar
2. Director (Elementary & Secondary Education) Khyber Pakhtunkhwa Peshawar
3. District Education officer (Female) DIKhan
4. District Accounts office DIKhan

(Respondents)

4,

Amended Service appeal U/S 7 KPK services tribunal Act 1974 read with order 41 rule 3 of civil procedure code 1908, against the impugned order bearing 6050-51 dated 23.04.2016 passed by responded No.3 for stoppage of illegal deduction Rs.1,10,554/- for 8 months w.e.f 01.04.2016 till full recovery, with the facts and grounds mentioned below.

It is prayed very humbly

Facts:

1. That the appellant was appointed as class-IV at the strength of middle schools at GGMS Hassam DIKhan vide No.8286—89 dated DIKhan the 23/08/2014 issued by the District Education Officer (Female) Dikhan (Annex-A)
2. That, after appointment the appellant took the charge and by the direction of DEO (female), the appellant performed duties in the office of DEO (Female) DIKhan.  
(copy of Taking over Charge /service book B-C)
3. That subsequently the appellant was transferred along with post from middle school strength to GGMS Basti Dhapan waki DIKhan vide no.5241-44 dated 29/08/2015 (Annex D Transfer order)
4. That the appellant has been performing duties regularly honestly and giving no opportunity of complaint to department (annex E copy of working certificate)
5. That the appellant was much aggrieved to see the segregated deduction of Rs.2000/- per month in the pay roll for the moth of 04/2016 without any reason and knowledge furthermore the respondent No.3 issued impugned order 6050-51 dated 23.04.2016 for deduction.2000/Pm w.e.f 01.04.2016 to 30.11.2016, which is illegal , unlawful and ineffective on the right appellant because the appellant never remained absent from duties copy of pay roll & impugned F,F/1.
6. That since till date the appellant requested the District Education Officer (Female) Dikhan dozens of times verbally and written to let the appellant know the reason for deduction of total Amount Rs.1,10,554/- and segregated Rs.2000/- PM but of no avail (Annex G Copy of applicant dated 28/09/2016).
7. That exceeding the patience the appellant submitted an appeal to the appellant authority i.e Director (Elementary and Secondary Education KPK on 12/10/2018 requesting therein to let the appellant know the reason for this illegal deduction but of no avail (Annex H copy of Appeal)

***Now let me contend sir with the following grounds:***

- a. That the appellant has regularly served up to the best satisfaction of high ups and the same fact is evident from the verification of his transfer to GGMS basti Dhapan Wali DIKhan w.e.f 01.09.2015 till

date by the DEO(F) concerned. So the segregated deduction from appellant pay is illegal unlawful and ineffective on right of the appellant further more the impugned order is illegal on the right of the appellant. (2)

- b. That the deduction is started malafide /Maleic without following the efficiency and disciplinary rules,2011 etc and the appellant has been kept in darkness and no-show cause was served upon the appellant. So the act of respondents is mollified and is to be set aside
- c. The appellant waited for the statutory period of 90 days but no order has been passed on the appeal /presentation. Hence the instant appeal is within time.
- d. That he acts of respondents is illegal, unlawful and ab-initio void, because the appellant has never been absent from duties. The impugned order bearing No.6050-51 dated 23.04.2016 of respondent No.3 is without justification & without lawful authority and liable to be set aside.
- e. That the Honorable service tribunal is vested with vast powers to accept the instant appeal and set aside the act of respondents.
- f. That the counsel of the appellant may kindly be allowed to raise additional ground at the time of arguments.

**Prayers.**

It is, therefore, humbly prayed to issue an order in favour of the appellant & against the respondents, directing therein to stop the illegal deduction and to re-pay the amount already deducted from the appellant & to set aside the impugned order bearing No.6050-54 dated 23.04.2016. Any appropriate order may kindly be issued in favour of appellant

  
YOURS HUMBLE APPELLANT  
Mr. Muhammad Zubair

Through Counsel

  
Sarwar Khan Kundi

Pir Ghulam Khan

  
Muhammad Haroon

AFFIDAVIT:

3

I, Mr. Muhammad Zubair Mughal S/o Abdul Hameed Mughal Naib Qasid of GGMS basti Dhpan Wali Dikhan solemnly declare and affirm on oath that the contents of the appeal are correct up to the best of my knowledge and nothing has been concealed from this honorable Tribunal.

  
Humble appellant



(Muhammad zubair mughal)

24/11/2020

(A) ~~AT~~

(4)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)**  
**DERA ISMAIL KHAN**

**APPOINTMENT ORDER:**

Consequent upon the recommendation of the Departmental selection committee Mr: Muhammad Zubair S/o Abdul Hameed R/o Village Kaich is hereby appointed as Naib Qasid against vacant post of N/Qasid at GGMS, Hissam in BPS-1(4800-150-9300) plus usual allowances admissible under rules and in the interest of public service from the date of their joining service.

**TERMS & CONDITIONS.**

1. His /her service will be considered as regular in terms of Section-19 of the NWFP, Civil Servants Act, 1973, amended in 2013 issued vide Govt. of Khyber Pakhtunkhwa, Finance Department (Regulation Wing) No. SOSR-III/FD/12-1/2005, dated 27-02-2013.
2. He will be governed by such rules and regulations as may be prescribed by the Govt. from time to time for the category to which she belongs.
3. His appointment is made purely temporary and liable to termination at any time without assigning any reasons.
4. One month pay will be forfeited to Govt. in case of resignation without prior notice. The period of giving notice is one month before the date of resignation.
5. His/ Her original certificates/degrees will be got verified by this office. All expenses will be borne by the candidate.
6. He/ She is required to join the post within 15 days, failing which the appointment order will stand cancel, automatically.
7. The appointment is made subject to the condition that the candidate is permanent domiciled of District D.I.Khan.
8. He / She is required to produce health and age certificate from Medical Superintendent D.I.Khan.
9. Charge reports should be sent to all concerned.
10. No TA/DA is allowed.

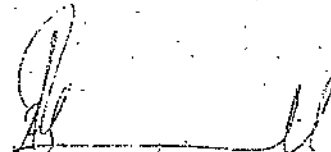
Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) D.I.KHAN.

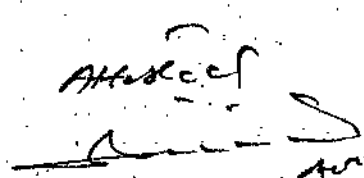
Endst No. 8286-89

Dated DIKhan the 23-8/2014

Copy forwarded for information to the:

1. The District Comptroller of Accounts DIKHAN.
2. Headmistress of Concerned Schools.
3. Accountant middle school local office.
4. The Candidates Concerned.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) D.I.KHAN.

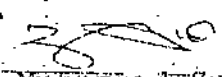


(B) ✓  
B (5) ✓

# CERTIFICATE OF TRANSFER OF CHARGE

(1) Certified that we have on the fore / afternoon of this day respectively made over received Charged of the Office of the N/Q Post. GGMS, Hissam DIKhan. Order Vide DEU(F) DIKhan. Endst: NO. 8286-89 dated 23/08/2014.

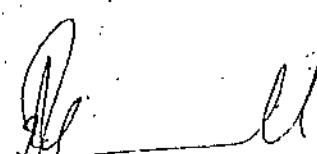
(2) Particulars cash and important secret and confidential documents handed over are noted on the reverse

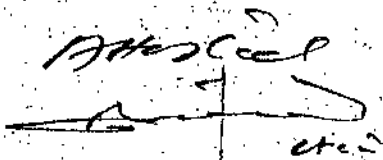
Signature of relieved Government Servant \_\_\_\_\_ V/Post. \_\_\_\_\_  
Designation \_\_\_\_\_ N/Q \_\_\_\_\_  
Station GGMS, Hissam.  
Signature of relieving Government Servant  Mr. Muhammad Zubair  
Designation \_\_\_\_\_ N/Q \_\_\_\_\_  
Date 23/08/2014 (AN).

Forwarded to the \_\_\_\_\_  
Endst: NO. 8275-78 dated: 23 /08/2014.

Copy to the:-

- 1)- District Accounts Officer D.I. Khan.
- 2)- Headmistress GGMS. Hissam DIKhan.
- 3)- Accountant Middle Schools Local Office.
- 4)- Official Concerned.

  
District Education Officer  
(Female) D.I. Khan.  
District Education Officer Female  
Dera Ismail Khan.

  
etc.

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

6

Name MUHAMMAD ZUBAIR MUGHAL

Race MUGHAL

Residence VILLAGE KECH TEH: 9 DISTT: DJ. KHAN

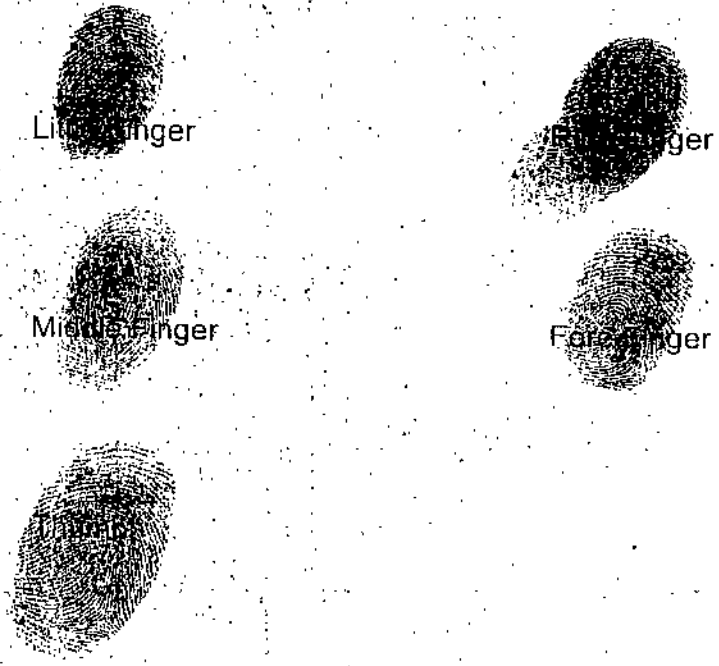
Father's name and residence ABDUL HAMEED MUGHAL

Date of birth by Christian era or as nearly as can be ascertained 12-03-1984 (Twelfth March N.H 9 Eighty-four)

Exact height by measurement 5' 08"

Personal marks for identification WOUND SCAR ON (RT) EYE BROW

Left hand thumb and finger impression of (non-gazetted Officer)



Signature of Government Servant [Signature]

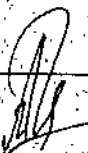
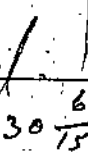
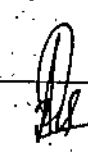


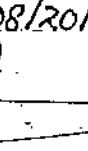
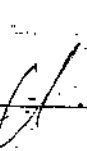

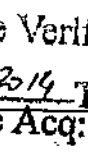
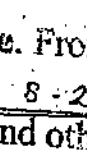
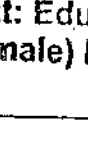

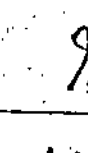


Signature and Designation of the Head of the Office, or other Attesting Officer.

[Signature]  
District Education Officer  
(Female) Dera Ismail Khan

[Signature]





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 of other attesting Officer	Name and duration of leave taken	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitale to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
					Period	Govt. to which debitale		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	ذو جہات انقطاع ملازمت ترقی۔ تازہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت دمعیاد	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تین	گورنمنٹ ہے رقم ادا ہوگی	دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کارپارڈ
 Distt: Edu: Officer (Female) D.I.Khan		 30/6/15 Service Reversal	 Distt: Edu: Officer (Female) D.I.Khan			Appointed as Naib Qasid in BPS-01 at GGMS Hissam Plus usual allowance vide DEO(F) D.I.Khan Endt. No: 828689 dated 23/08/2014		
 Distt: Edu: Officer (Female) D.I.Khan		Transfer 31-08-15	 Distt: Edu: Officer (Female) D.I.Khan			District Education Officer (Female) Dera Ismail Khan		
 Distt: Edu: Officer (Female) D.I.Khan						① Service Verified w.e. From 23-08-2014 To 31-8-2015 from the Acq. Roll and other Record		
						Recovery of Absent Period of ② months Total Amount of Reim Rs 110554/- Rate of Reim Rs 2000/pm DATE of Reim Start-1-4-2016	 Distt: Edu: Officer (Female) D.I.Khan	
						Reim Rs 2000/pm Reim Start on 4/16 Total Reim Rs 110554/-		
		 2015						

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 rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Servant
درجہ ملازمت	عارضی مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پینشن کا مستحق ہے	تجواہ بطور عارضی ملازمت	زائد تجواہ بطور قائم مقام	ماسوائے تجواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم

Allowed Step/Scale Upgradation  
 from BPS-01 to BPS-03 w.e.f 07-7-2015  
 vide Govt. of KPK FD Regulation No: FD/ISO (FR) 7-20 dt: 06/15

Departmental fixation is as under

Pay on 23-08-2014	BPS-01	4800-
" " 01-12-2014	---	4800-
" " 01-07-2015	RBPS-01	6210-
" " 01-07-2015	BPS-03	(6795) NAR&PM
" " 01-12-2015	---	6795-otimum not
" " 01-07-2016	RBPS-3	(8360) Beneficial Scale/Rates

6210<sup>15</sup>  
 8365<sup>16</sup>

**Dist. Edu. Officer (Female) D.I. Khan**  
 24/08/2016

Govt. of Khyber Pakhtunkhwa  
 Department of Education  
 District Office, D.I. Khan

AO: 6210 = 120600  
 Pay Fixed @ Rs. 6210-00 w.e.f 07-2015  
 R.B.P.S. 8040 = 325500  
 Pay Fixed @ Rs. 8365-00 w.e.f 07-2016  
 Date of Next increase: 07-12-2016

M. J. Khan  
 Accounts Officer  
 Pay Fixing

70

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 reward or praised of the Government servant
				Name and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی جابلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین	دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کارپکارڈ
				Period	Govt: to which debitable		
				عرصہ	گورنمنٹ جے رقم اداہوگی		

### DEPARTMENTALY FIXATION

Award of Premature Increment w.e. from 01.07.2014 vide Finance Deptt: Notification No. FD/SO(SR-1) 2/123/2014 Dated 14.07.2014 and Award of 2 Steps up-gradation of Class-IV vide Finance Deptt: Notification No. FD/SO/(FR) 7-20/2015 Dated 30.06.2015

PAY ON 03.08.2014 (Premature Inct.)	Rs. 4800/Pm.
PAY ON 01.12.2014 (Premature Inct.)	Rs. 4800/Pm.
PAY ON 01.07.2015 (BPS- 01)	Rs. 6210/Pm.
PAY ON 01.07.2015 (BPS- 03)	Rs. 6795/Pm.
Premature Increment	
PAY ON 01.12.2015 (BPS-	Rs. 6795/Pm.

### UNDER TAKING

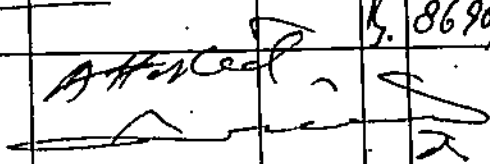
I Mr. Muhammad Zubair Maghal hereby undertake that if any overpayment is made against me in the result of in-correct fixation, it will be recovered from my pay/ Pension

Signature Employee

Distt: Edu: Officer  
(Female) D.I. Khan

110

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 rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Servant
درجہ ملازمت	عارضی - مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پنشن کا مستحق ہے	تنخواہ بطور عارضی ملازمت	زائد تنخواہ بطور قائم مقام	بیسواے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
BPS: 01 (7640-240-14840)			Rs.	Ps.	Rs.	Ps.	
N/Q David CQMS Bosth Dtop.wala					6609		12/15
25-01							
NLR							
BPS-01					8129		12/16
NR							
Revised Estimates due to up. gradation of Post. BPS: 01 to BPS: 03. w. e. from 01-7-15.							
BPS: 03 (4080-325-17790)							
N/Q David CQMS Bosth Dtop.wala; or					Rs. 6795/Per		01/7/2015
	Do	Do			Rs. 6795/Per		01/12/2015
BPS: 03 (4080-325-17790)							
N/Q David					Rs. 8365/Per		01/7/2016
	Do				Rs. 8690/Per		01/12/2016

Affected  


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 Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant	
				Name and duration of leave taken	Period	Govt: to which debitable		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجہات انقطاع ملازمت ترقی - تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کے ہوتے ہیں	عرصہ	دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کاریکارڈ
Distt: Edu: Officer (Female) D.I.Khan					2	Service Verified w.c. From 01-09-2015 To 30-06-2016 from the Acq: Roll and other Record.		
Distt: Edu: Officer (Female) D.I.Khan						District Education Officer (Female) Dera Ismail Khan		
Distt: Edu: Officer (Female) D.I.Khan		30/11/2015 (A) / Inad. / no? due	Distt: Edu: Officer (Female) D.I.Khan			TCA No. _____ Dated _____ Drawn Rs _____ on alc of award of B w.e.f _____ to _____ R/o _____		
Distt: Edu: Officer (Female) D.I.Khan		Scale Revised 30-6-2016	Distt: Edu: Officer (Female) D.I.Khan			TCA No. 177 Dated 6-2-17 Drawn Rs = 42973/- on alc of award of B w.e.f 1-7-15 to 31-10-16 R/o _____		
Distt: Edu: Officer (Female) D.I.Khan		A/Gment 30/11/16	Distt: Edu: Officer (Female) D.I.Khan					
Distt: Edu: Officer (Female) D.I.Khan		Scale Revised 30/06/17	Distt: Edu: Officer (Female) D.I.Khan					

13

1	2	3	4	5	6	7	8	9
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 rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Servant.	Signature designating the Officer or other Attestation Office attesting columns
درجہ ملازمت	عارضی - مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پنشن کا مستحق ہے	تنخواہ بطور عارضی ملازمت	زائد تنخواہ بطور قائم مقام	باسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم	دستخط بر مجاز
Pans 03 (9610-390-21310)			Rs.	Ps.	Rs.	Ps.		
M. Darda, 89 Ms, Besti Dhopi			wel, 17/11	10390/h		01/7/17		Distt: (Fem)
180				10780/h		01/7/17		Dis (Fa)
Attached			[Signature]					

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 of other attesting Officer	Name and duration of leave taken	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant سزایا جزایا غیر مناسب کارکردگی کارپکارڈ
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی - تبادلہ یا بر طرفی	دستخط افسر مجاز	رخصت کی نوعیت ومعیار	Period عرصہ	Govt: to which debitable گورنمنٹ سے رقم ادا ہوگی	دستخط افسر مجاز	
Distt: Edu: Officer (Female) D.I.Khan	30/11/17		A/O 30/11/17			③	Service verified w.e.f. from	01-07-2016 To 30-11-2017
District Education Officer (Female) Dera Ismail Khan			Distt: Edu: Officer (Female) D.I.Khan			from the Aq. Rec. and	Other office record.	
District Education Officer (Female) Dera Ismail Khan			Distt: Edu: Officer (Female) Dera Ismail Khan				District Education Officer (Female) Dera Ismail Khan	

Attended





(D) 12  
(15)

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN**

**OFFICE ORDER:-**

Mr, Mohammad Zubair N/Qasid working against GGMS, Strength 1 hereby transfer/ adjusted with post at GGMS, Basti Dhapanwali DIKhan in the interest of public service with effect from the date of taking over charge.

Note: -

1. No. TA/DA etc. is allowed.
2. Charge reports should be submitted as usual.
3. One N/Q post is hereby transfer /shifted from GGMS, strength to GGMS, Basti Dhapanwali DIKhan on 01/09/2015.

SD/-  
**DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN.**

Emdst No. 5241-46 Dated DIKhan the 28/8/2015

Copy of the above is forwarded for information: -

01. District Accounts Officer D.I.Khan
02. Programmer EMIS/Budget & Account Officer, Local Office.
03. Headmistress GGMS, Basti Dhapanwali DIKhan with the remarks to stick compliance the order.
04. Official Concerned

  
**DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN**

Distt. Edu. Officer  
(Female) DIKhan



E 13

16

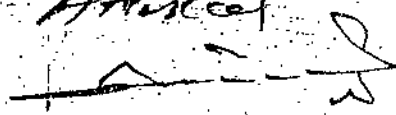
SERVICE / WORKING CERTIFICATE.

Certified that Mr, Muhammad Zubair S/o Abdul Hameed has been working As Naib Qasid in Education Department since 23/08/2014 and now he is working at GGMS, Basti Dhapan Wali DIKhan w.e.f, 01.9.2015 to date. He is duty performed very regularly, honestly, punctual, without any break and the undersigned are entirely satisfied with performance of his work/duty.

Dated:29/08/2018.

*Yasmin Shikhan*  
Head Mistress  
G.G.M.S  
Basti Dhapan Wali  
DIKhan  
HEAD MISTRESS

GGMS, BASTI DHAPAN WALI DIKHAN.

*Muhammad Zubair*  


Salary slip ( 00721532 April , 2016 ).PDF

**Dist. Govt. NWFP-Provincial**  
**District Accounts Office D.I.Khan**  
**Monthly Salary Statement (April-2016)**

**Personal Information of Mr MOHAMMAD ZUBAIR d/w/s of ABDUL HAMID**

Personnel Number: 00721532 CNIC: 1210114241729 NIN:  
 Date of Birth: 12.03.1984 Entry into Govt. Service: 23.08.2014 Length of Service: 01 Years 08 Months 009 Days

**Employment Category: Active Temporary**

Designation: NAIB QASID 80001697-DISTRICT GOVERNMENT KHYBE

DDO Code: DI6031-D O ( S&amp;L ) F DIK (TEM)

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No: 00721532 P73.V4 Interest Applied: Yes

GPF Balance: 4,539.00

Vendor Number: -

**Pay and Allowances:**

Pay scale: BPS For - 2015

Pay Scale Type: Civil BPS: 01

Pay Stage: 2

Wage type	Amount	Wage type	Amount
0001 Basic Pay	5,600.00	1000 House Rent Allowance	891.00
1210 Convey Allowance 2005	1,785.00	1833 Integrated Allowance (2005)	300.00
1973 Adhoc Allowance 2011 @ 50%	1,485.00	2148 15% Adhoc Relief All-2013	720.00
2174 Adhoc Relief Allow-2014	480.00	2199 Adhoc Relief Allow @ 10%	660.00
5801 Adj Basic Pay	10.00		0.00

**Deductions - General**

Wage type	Amount	Wage type	Amount
3001 GPF Subscription - Rs 274	-274.00	3501 Benevolent Fund	-120.00
3511 Addl Group Insurance	-3.00	3604 Group Insurance	-58.00
3914 Education (ROP)	-2,000.00	3990 Emp. Edu. Fund KPK	-50.00
4290 Professional Tax	-10.00		0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 0.00 Recovered till April-2016: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 12,931.00

Deductions: (Rs.): -2,515.00

Net Pay: (Rs.): 10,416.00

Payee Name: MOHAMMAD ZUBAIR

Account Number: CA 3167-8

Bank Details: NATIONAL BANK OF PAKISTAN, 231420 SHEIKH YOUSAF BRANCH D.I.KHAN, D.I.KHAN

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: DIKHAN

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

*(Handwritten Signature)*



(18) (F/1) ✓

# OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) D.I.KHAN

No. 6050

The Dated 23/04/2016

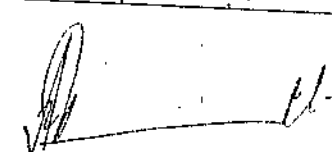
TO;

THE DISTRICT ACCOUNTS OFFICER  
DERA ISMAIL KHAN.

**SUBJECT: RECOVERY OF PAY**

It has come to the notice of this office that following class-ivs servants working in the GGMS strength remained absent further duties for the period noted against him and he got their pay regularly. The absent period has been converted as leave pay by this office, therefore the recovery of pay calculated and mentioned against his name may please be recover from his salary in easy installment w.e.f 01-04-2016.  
The detail given below.

S.No	Name	Personal No	Total amount of Recovery	Rate Of Recovery
1	Muhammad Arif N/Q	00727036	Rs.110554	Rs.2000 per month
2	Syed.Qamar Abbas SWP	00726459	Rs.110554	Rs.2000 per month
3	Fazal Karim SWP	00726455	Rs.110554	Rs.2000 per month
4	Saqib Mehmmod N/Q	00708830	Rs.110504	Rs.2000 per month
5	Muhammad Zubair N/Q	00721532	Rs.110554	Rs.2000 per month
6	Muhammad Kamal N/Q	00723521	Rs.110504	Rs.2000 per month

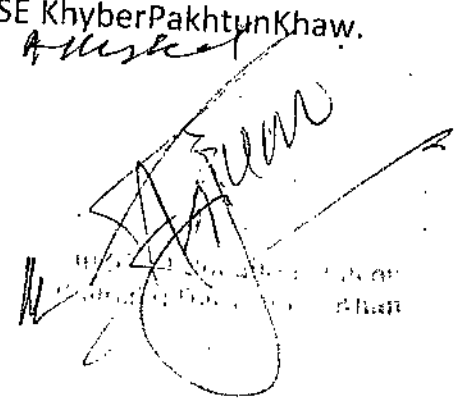
  
District Education Officer  
(Female) DERA ISMAIL KHAN

Endst: No. 6051

Dated:    /   /2016.

Copy to the:-

1. The Director E&SE KhyberPakhtunKhaw.

  
DISTRICT EDUCATION OFFICER  
(FEMALE)DERA ISMAIL KHAN

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (زنانه) ڈیرہ اسماعیل خان

Appeal for Just/Reguler Pay Dues/Recovery of Over Payment

جناب عالیہ

گزارش ہے کہ سائل کا بیٹا محمد زبیر GGMS جی دھپاں والی میں بطور نائب قاصد خدمات سرانجام دے رہا ہے مگر شوقی قسمت کہ جب سے میرا بیٹا ایجوکیشن میں آگست 2014 میں بھرتی ہوا ہے، DEO آفس کا عملہ اور خاص کر اکاؤنٹ صاحب میرے بیٹے سے زیادتی یہ زیادتی کر رہا ہے اور لالچ کی خاطر بھی تنخواہ بند کر دیتا ہے کبھی کھول دیتا ہے کبھی بینک میں نہیں جاتی اور کبھی تنخواہ کی لسٹ میں نام نہیں ہوتا۔

1 اس سے پہلے سائل کے بیٹے کی اکاؤنٹ صاحب نے نومبر 2014 میں تنخواہ بند کی تھی پھر اپریل 2015 میں کھول دی تھی۔ اور اب پھر جولائی 2016 میں تنخواہ بند کر دی گئی تھی، بغیر کسی قانونی تقاضے پورے کیے۔ دفتر والے تنخواہ بند کرنے کا سروس فارم دکھاتے ہیں اور نہ ہی کسی مجاز افسر کے تنخواہ بند کرنے کا لیسٹر دکھاتے ہیں اور نہ ہی کوئی سروس فارم کاریکارڈ DAO میں ملتا ہے۔

2 اس کے علاوہ میرے بیٹے کی تنخواہ میں کوئی وجہ بتلائے بغیر ریکوری -110554/- روپے -2000 روپے مہینہ اپریل 2016 سے شروع کی گئی ہے۔ اور سروس بک میں آٹھ مہینے لم غیر حاضری لکھی گئی ہے۔ جس میں کسی بیڑیڈ کا ذکر نہیں ہے۔ جب کہ سروس بک میں DEO صاحبہ نے تمام انٹری پر دستخط اور سروس بک Verified بھی کر دی تھی۔ پھر اچانک ایک سال کے بعد بوس کارروائی کر کے زیادتی کی گئی ہے۔ نہ کوئی میرے بیٹے کو کوئی صفائی کا موقع دیا گیا ہے اور نہ ہی کوئی وجہ بتائی گئی ہے۔

3 اس کے علاوہ ہم نے انصاف کے لیے DEO صاحبہ کو تحریری طور پر 21-01-2015، 26-01-2015، 26-02-2015، 05-2016 اور 06-08-2016 کو اپنی دادرسی پیش کر چکے ہیں آج تک ہمیں کسی بھی درخواست کا تحریری رزلٹ نہیں ملا ہے۔

4 میرے بیٹے کی ریگولر تنخواہ مارچ 2015 اور جولائی 2016 کی ابھی تک بقایا ہے۔

5 میرے بیٹے کو بار بار التجا کرنے کے باوجود ابھی تک بھرتی سے لے کر اب تک میڈیکل الاؤنس -1500/- روپے نہیں مل رہا ہے۔

6 میرے بیٹے کو گورنمنٹ کے قوانین کے مطابق BPS-1 to BPS-3 کا اپگرڈیشن کے بقایا جات نہیں ملے ہیں اور نہ ہی سروس بک میں کوئی کام ہوا ہے۔ جس کے لئے ہم نے مئی 2016 میں درخواست بھی دی ہے۔

7 آپ سے التماس ہے کہ آپ مذکورہ اکاؤنٹ کی اندھیر نگری جاننے کے لئے ڈل سکول کی بجٹ کاپی کی پوسٹیں جون 2013ء تا اگست 2016ء اور گرانڈل سکول کی Breakup of Posts کی تفصیل چیک کر لیں جس میں شیڈنگ اور نان شیڈنگ کی تفصیل درج ہیں۔ آپ کو خود بہ خود معلومات حاصل ہو جائیں گی۔

میں آپ سے امید کرتا ہوں کہ میری گزارشات کو مد نظر رکھ کر آپ ضرور انصاف کے تقاضے پورے کریں گے۔ اور غیر جانبدار انکوائری کرائی جائے تاکہ ذرا تیا ت کرنے والے کو سزا ملے۔

آپ کی عین نوازش ہوگی

عسور الجوز

دالہ زبیر

نقطہ مورخہ 28-09-2016

عارض

عبدالحمید ولد غلام سرور گاؤں وڈا کھانہ بیچ تحصیل ضلع ڈیرہ اسماعیل خان / والد محمد زبیر نائب قاصد GGMS ہستی دھپاں والی ڈیرہ اسماعیل خان

کاپی برائے اطلاع اور فوری کارروائی کی اپیل :-

1 وزیر اعلیٰ کمپلیٹ سیل KPK پشاور

2 صوبائی احتساب کیشنر KPK پشاور

3 ڈائریکٹر KPK E & SED پشاور کمپلیٹ سیل ایجوکیشن پشاور

4 ڈپٹی کمشنر ڈیرہ اسماعیل خان

No.155

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

Rs. 50/-

Received a registered letter addressed to

Date Stamp

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

Insured for Rs. (in figures)

(in words)

Insurance fee Rs. Ps.

Weight Kilo Grams

Name and address

(A) 16-25

**خدمت جناب ڈائریکٹر ایجوکیشن (E&SED) خیبر پختونخواہ پشاور**  
**Against ~~Detention~~ / Illegal Deduction /**  
**Appeal ~~XXXXXXXXXX~~ Recovery of Over Payment** ان:-

ب عالیا

گزارش ہے کہ سائل محکمہ تعلیم میں بطور نائب قاصد مورخہ 23-08-2014 سے Regular خدمات سرانجام دے رہا ہے۔ سائل کی Accountant گریڈ مل سکول اور دفتر ہڈانے اپریل 2016 سے -/1105541 آٹھ ماہ کی لم سم ریکوری کی سروس بک میں انٹری کی ہوئی ہے اور -/2000 روپے ہر ماہ پے رول سے ریکوری کر رہے ہیں۔ اور یہ تمام کام بغیر کسی قانونی کارروائی کے کیا گیا ہے۔ جس میں نہ تو کسی پیورٹ کا ذکر ہے جو کہ مجھ سے زیادتی اور نا انصافی کی گئی ہے۔

سائل کو دفتر یا اکاؤنٹنٹ صاحب کی طرف سے نہ کبھی کوئی لیٹر ایٹو کیا گیا اور نہ وارنگ دی گئی نہ کوئی شو کا نوٹس نہ Explanation call اور نہ ہی کوئی Personal Hearing کی گئی ہے اور نہ ہی دفتر والے مجھے کوئی ریکارڈ دکھاتے ہیں نادیتے ہیں جو کہ غیر اخلاقی اور غیر قانونی ہے۔

سائل کے خلاف E&D رولز کے تحت نہ کوئی کارروائی کی گئی نہ ہی سائل کو E&D رولز کے تحت صفائی کا موقع دیا گیا۔

جبکہ سائل کی 23-08-2014 تا 30-11-2017 تک کی پیورٹ تک متعلقہ DEO/DDO صاحب نے Service Verification بھی کر دی تھی جسکی بعد میں ریکوری اور غیر حاضری کا کوئی قانونی جواز نہیں بنتا ہے۔

اس سے پہلے سائل اپنی دادرسی حل کرنے کیلئے متعلقہ DEO میں ڈیرہ اسماعیل خان اور جنوں درخواست پائیش کر چکا ہے مگر کسی پر عمل درآمد نہیں ہوا اس لئے اب با امرے مجبوری اپنی دادرسی آپ کو حل کرنے کیلئے پیش کرنے کی جسارت کر رہا ہے۔ اسلئے میری آپ التماس ہے کہ میری غیر قانونی ریکوری کو ختم کیا جائے اور جو ریکوری کی گئی ہے وہ مجھے دوبارہ واپس کی جائے مجھ غریب کلاس نور سے زیادتی کی گئی ہے مجھے انصاف دلایا جائے اور میری ریکوری کو ختم فرمایا جائے بندہ دعا گو ہے گا۔ بعد از بندہ عدالت جانے کا حق محفوظ رکھتا ہے۔

آپ کی عین نوازی ہوگی

**السمارض**

مورخہ 12/10/2018

محمد زبیر نائب قاصد GGMS بستی دھپانوالی ڈیرہ اسماعیل خان

Certified that above name Class-IV of this school has been Performing Du  
 Regularly, Honestly with out any break/Leave Science 01-09-2015 to till date and Il  
 Undersigned are entirely Satisfied with the performance of his work/duty.

No. 311

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

Received a registered\* addressed to \_\_\_\_\_ Date-Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_

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

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_

Name and address of sender \_\_\_\_\_

Head Mistress  
 GGMS  
 Basti Dhapanwalli  
 D.I.Khan. Head Mistress  
 GGMS Basti Dhapanwalli

Dhapanwalli



PIR GHULAM KHAN

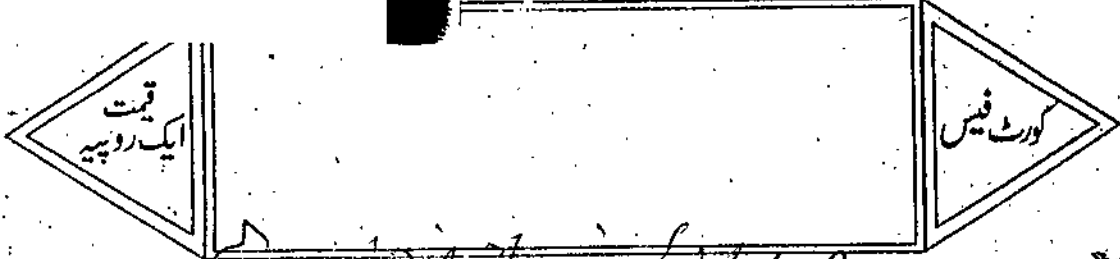
Advocate  
bc-18-1199  
Date of issue: December 2018  
Valid upto: December 2021



Secretary  
KP Bar Council

21

# وکالت نامہ



بعدالت جناب جج صاحب کورٹ سیشن کراچی کراچی اور  
 منجانب سائل محمد زبیر عظیمی سول  
 محمد زبیر عظیمی نام حکومت KPK  
 دعویٰ یا جرم عملی قانونی کٹوتی از خایانہ تنخواہ مذکورہ  
 تفصیل دعویٰ یا جرم 12/12/2019 Appeal no  
 باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجود ہی برائے پیشی یا تصفیہ مقدمہ کے مقابله  
 میں حضور محمد زبیر عظیمی سول

کو حسب ذیل شرائط پر وکیل قرار دیا ہے، کہ میں ہر پیشی پر خود بذریعہ اختیار خاص روز در عدالت حاضر ہونا رہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب  
 موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر ظہیر حاضر نہ ہوں اور مقدمہ میری غیر حاضر کی امید سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف  
 اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے  
 ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ  
 ہوں گے۔ اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نسیان پہنچے تو اس کے ذمہ  
 دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا نسیان واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ نیز کوکل ساختہ پر داخل صاحب موصوف عمل کر رہ  
 ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراءے ڈگری و نظر ثانی اپیل مگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا  
 بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کارروائی وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے میان دینے اور اس پر غامی یا راضی نامہ و فیصلہ پر  
 حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از پکھری صدر بیرونی مقدمہ مذکورہ نظر ثانی اپیل و مگرانی و برآمدگی  
 مقدمہ یا منسوخی ڈگری یا طرف یا درخواست حکم اختتامی یا قرتی یا گرفتاری نکل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا ملکی طیفہ عدالت بیرونی کا اختیار ہوگا  
 اور تمام ساختہ پر داخل صاحب موصوف عمل کر رہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو  
 کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا مگرانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا پھر منکر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو  
 بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ میرا جائے التوا ہے یا کچھ وہ صاحب  
 موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور اسکی  
 صورت میں میرا کوئی مطالبہ کسی حکم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ کھدیا ہے۔ تاکہ سند رہے  
 مورخہ 25 دسمبر 2019ء

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد  
 العبد  
 العبد  
 M. Zuber  
 Appellant.

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

Service appeal No. 121/2019

Year 2019

Mr. Muhammad Zubair Mughal S/o Abdul Hameed Mughal Naib Qasid, GGMS Basti Dhapan Wali D.I.Khan

(Appellant)

Diary No. 113  
Dated 28/1/2019

**Versus**

1. The Govt: of Khyber Pakhtunkhwa through Secretary elementary and Secondary Education Peshawar.
2. Director (elementary & Secondary Education) Khyber Pakhtunkhwa.
3. ~~The District education Officer (Female) DIKhan.~~
4. District Account Officer DIKhan.

(Respondents)

**Subject: SERVICE APPEAL U/S 4 OF SERVICES TRIBUNAL ACT 1974 AGAINST STOPPAGE OF ILLEGAL DEDUCTION RS. 1,10,554/- AND RECOVERY OF THE AMOUNT ALREADY DEDICATED SEGREGATE AMOUNTING TO RS. 2000/- PER MONTH ON THE FACTS AND GROUNDS MENTIONED BELOW:**

It is prayed very humbly:

**Facts:**

1. That the appellant was appointed as class-IV at the strength of middle schools at GGMS Hassam DIKhan vide No. 8286-89 dated DIKhan the 23/08/2014 issued by the District education Officer (Female) DIKhan (Annx:A)
2. That, after appointment the appellant took the charge and by the directions of DEO (female), the appellant performed duties in the office of DEO(Female) DIKhan. (Copy of charge taking/Service book B-C)
3. That subsequently the appellant was transferred along with post from Middle School strength to GGMS Basti Dhapan wali DIKhan vide No. 5241-44 dated 29/08/2015 (Annex D transfer order)
4. That the appellant is performing duties regularly honestly and giving no opportunity of complaint to department (annex E copy of working certificate)
5. That the appellant was much aggrieved to see the segregated deduction of Rs. 2000/- per month in the pay roll for the month of 04/2016 without any reason and knowledge. (Annex-F copy of pay role)
6. That since till date the appellant requested the District Education Officer (Female) DIKhan dozens of times verbally and written to let the appellant know the reason for deduction of total amount Rs.1,10,554/- and segregated Rs. 2000/- pm but of no avail (Annx G copy of application dated 28/09/2016)
7. That exceeding the patience, the appellant submitted an appeal to the appellant authority i.e director (Elementary and Secondary Education KPK on 12/10/2018),

Filed to-day  
Registrar  
28/1/19



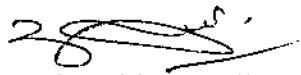
requesting therein to let the appellant know the reason for this illegal deduction but of no avail (Annex H copy of appeal)

*Now let me contend Sir with the following grounds:*

- a. That the appellant has regularly served upto the best satisfaction of his high ups and the same fact is evident form the verification of his services in the service book w.e.f 23/08/2014 to 31/08/2015 and after transfer to GGMS Basti Dhapan Wali DIKhan w.e.f 01/09/2015 till date by the DEOF concerned. So the segregated deduction form appellant pay is illegal unlawful and ineffective on right of the appellant.
- b. That the deduction is started malafidely/maliecly without following the efficiency and Disciplinary rules, 2011 etc and the appellant had been kept in darkness and no-show cause notice was served upon the appellant. So the act of respondents is mollified and is to be set aside.
- c. That appellant waited for the statutory period of 90 days but no order has been passed on the appeal/presentation. Hence the instant appeal is within time.
- d. That he acts of respondents is illegal, unlawful and eb-initio void, because the appellant has never been absent from duties.
- e. That the Honourable Service Tribunal is vested with vast powers to accept the instant appeal and set aside the act of respondents
- f. That the Counsel of the appellant may kindly be allowed to raise additional grounds at the time of arguments.

**Prayers**

It is, therefore, humbly prayed to issue an order in favour of the appellant & against the respondents, directing there in to stop the illegal deduction and to re-pay the amount already deducted from the appellant.

  
 Your humble appellant  
**Mr. Muhammad Zubair**

**Through Council**  
 1. Sarwar Khan *Kandli Advocate*  
 2. Pir Ghulam Khan  
 3. Mr. M.Haroon

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA  
MUHAMMAD ZUBAIR V/S GOVERNMENT OF KPK etc

**Service Appeal**

Application for to suspend the impugned order/act/proceeding of segregated deduction from monthly salary of the appellatant till the decision of appeal.

**R/Sir**

1. That the instant appeal is filling before this honorable tribunal & the instant application may be consider as a part and parcel of the main appeal.
2. That the appeal is prime-facia & the appellatant is hopeful that the appeal would be decided in favour of the appellatant.
3. That the respondent are illegally deducting segregate amount Rs.2000/-/PM from the pay of appellatant. The appellatant is the only source for the livelihood of a huge family, if the illegal order is not suspended the appellatant would surely face irreparable loss & he would face tangle of multiple problems.

It is, therefore, humbly prayed that the order/act/proceeding of segregate deduction form the monthly pay of the appellatant may kindly be suspended till the final decision of the main appeal.

✓

*[Signature]*

Your humble appellatant

**Mr. Muhammad Zubair**

*[Signature]*

Through Council

1. Sarwar Khan *Munshi Advicall*
2. Pir Ghulam Khan *Morwal Ad*
3. Mr. M.Haroon *Morwal Ad*

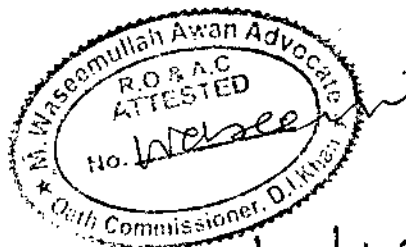
**AFFIDAVIT**

I, **Mr. Muhammad Zubair**, solemnly affirm and declare on Oath that the contents of this application are true/correct up to the best of my knowledge and nothing has been kept concealed.

*[Signature]*

Your humble appellatant

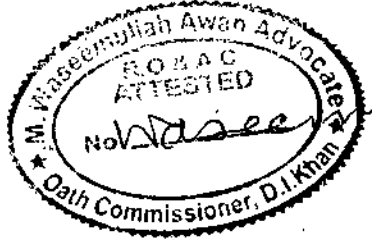
**Mr. Muhammad Zubair**



23/1/18

**AFFIDAVIT**

I, **Mr. Muhammad Zubair**, solemnly affirm and declare on Oath that the contents of this ~~document~~ <sup>appeal</sup> are true/correct up to the best of my knowledge and nothing has been kept concealed.



Your humble appellant  
**Mr. Muhammad Zubair**

23/1/19



A-5

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)**  
**DERA ISMAIL KHAN**

**APPOINTMENT ORDER:**

Consequent upon the recommendation of the Departmental selection committee Mr: Muhammad Zubair S/o Abdul Hameed R/o Village Kaich is hereby appointed as Naib Qasid against vacant post of N/Qasid at GGMS, Hissam in BPS-1(4800-150-9300) plus usual allowances admissible under rules and in the interest of public service from the date of their joining service.

**TERMS & CONDITIONS.**

1. His /her service will be considered as regular in terms of Section-19 of the NWFP, Civil Servants Act, 1973, amended in 2013 issued vide Govt. of Khyber Pakhtunkhwa, Finance Department (Regulation Wing) No. SOSR-III/FD/12-1/2005, dated 27-02-2013.
2. He will be governed by such rules and regulations as may be prescribed by the Govt. from time to time for the category to which she belongs.
3. His appointment is made purely temporary and liable to termination at any time without assigning any reasons.
4. One month pay will be forfeited to Govt. in case of resignation without prior notice. The period of giving notice is one month before the date of resignation.
5. His/ Her original certificates/degrees will be got verified by this office. All expenses will be borne by the candidate.
6. He/ She is required to join the post within 15 days, failing which the appointment order will stand cancel, automatically.
7. The appointment is made subject to the condition that the candidate is permanent domiciled of District D.I.Khan.
8. He / She is required to produce health and age certificate from Medical Superintendent D.I.Khan.
9. Charge reports should be sent to all concerned.
10. No TA/DA is allowed.

Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) D.I.KHAN.

Endst No 8286-89

Dated DIKkhan the 23-8/2014

Copy forwarded for information to the:

1. The District Comptroller of Accounts DIKHAN.
2. Headmistress of Concerned Schools.
3. Accountant middle school local office.
4. The Candidates Concerned.

**ATTESTED**

FAHIM NAWAZ  
SS (H/Civ) BS-17  
GHSS, Kach, D.I.Khan

DISTRICT EDUCATION OFFICER  
(FEMALE) D.I.KHAN.

# CERTIFICATE OF TRANSFER OF CHARGE

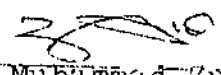
(1) Certified that we have on the fore / afternoon of this day respectively made over received Charged of the Office of the N/Q Post. GGMS, Hissam DIKhan. Order Vide DEO(F) DIKhan Endst: NO. 8286-89 dated 23/08/2014.

(2) Particulars cash and important secret and confidential documents handed over are noted on the reverse

Signature of relieved Government Servant \_\_\_\_\_ V/Post. \_\_\_\_\_

Station GGMS, Hissam.

Designation \_\_\_\_\_ N/Q \_\_\_\_\_

Signature of relieving Government Servant   
Mr: Muhammad Zubair

Date 23/08/2014 (AN).

Designation \_\_\_\_\_ N/Q \_\_\_\_\_

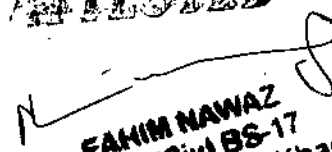
Forwarded to the \_\_\_\_\_

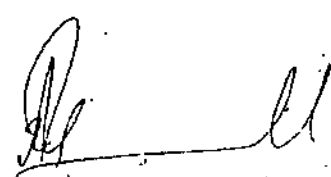
Endst: NO. 8275-78 dated: 23 /08/2014.

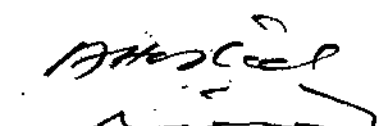
Copy to them:

- 1)- District Accounts Officer D.I. Khan.
- 2)- Headmistress GGMS, Hissam DIKhan.
- 3)- Accountant Middle Schools Local Office.
- 4)- Official Concerned.

**ATTESTED**

  
**FAHIM NAWAZ**  
SS (H/Civ) BS-17  
GHSS, Kach, D.I. Khan

  
District Education Officer  
(Female) D.I. Khan.  
District Education Officer Female  
Dera Ismail Khan

  
etc

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



Name MUHAMMAD ZUBAIR MUGHAL

Race MUGHAL

Residence VILLAGE KECH TEH: 9 DISTT: D.I.KHAN

Father's name and residence ABDUL HAMEED MUGHAL

Date of birth by Christian era or as nearly as can be ascertained 12-03-1984 (Twelveth March N.H 9 Eighty four)

Exact height by measurement 5' 08"

Personal marks for identification WOUND SCAR ON (RT) EYE BROW

Left hand thumb and finger impression of (non-gazetted Officer)



Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb

**ATTESTED**

FAMIA NAWAZ  
SS (H/Civ) BS-17  
G.H.S.S. Kach, D.I.Khan

Signature of Government Servant [Signature]

Signature and Designation of the Head of the Office, or other Attesting Officer.

[Signature]  
District Education Officer  
(Female) Dera Ismail Khan

[Signature]



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 rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Servant
درجہ ملازمت	عارضی مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پنشن کا مستحق ہے	تخواہ بطور عارضی ملازمت	زائد تخواہ بطور قائم مقام	ماسوائے تخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
			Rs.	Ps.	Rs.	Ps.	
<u>BPS-01(4800-150-9300)</u>							
Post: N/Q GGMS Hissam Dikhan					RS 4800/-	23.08.2014	[Signature]
					4950/-	01/14	
	150 -	150 -			6407/-	01/15	[Signature]
					6207/-		
<u>BPS-16 210-195-12060)</u>							
G.P.S. Basri Dhappu wali		- Du -			6407/-	01/9.2015	[Signature]
					6210/-		

ATTESTED  
 FAHIMA NAWAZ  
 SS (H/Civ) BS-17  
 GHSS, Kach, D.I.Khan

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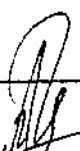
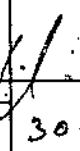
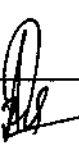
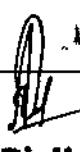
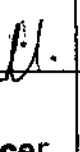


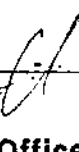

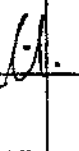



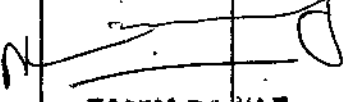
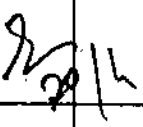
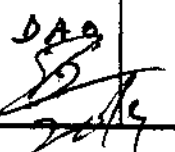
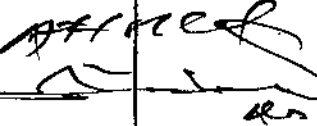
دستخط سرکار

[Signature]  
 Distt: E  
 (Female)

[Signature]  
 Distt: E  
 (Female)

[Signature]  
 Distt: E  
 (Female)

Recd  
 Sd/-

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 of other attesting Officer	<p align="center"><b>LEAVE</b></p> <p>Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government</p>		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant	
				Name and duration of leave taken	Period	Govt. to which debitable		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	ذخوات انقطاع ملازمت ترقی - تازلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت دمعیاد	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین عرصہ	گورنمنٹ جسے رقم ادا ہوگی	دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کارپکارڈ
 Distt: Edu: Officer (Female) D.I.Khan		 30 <sup>6</sup> / <sub>15</sub> Secate Revue	 Distt: Edu: Officer (Female) D.I.Khan					Appointed as Naib Qasid in BPS-01 at GGMS Hissam Plus usual allowance vide DEO(F) D.I.Khan Endt: No: 828689 dated 23/08/2014
 Distt: Edu: Officer (Female) D.I.Khan		Transfer 31-08-15	 Distt: Edu: Officer (Female) D.I.Khan				 District Education Officer (Female) Dera Ismail Khan	
 Distt: Edu: Officer (Female) D.I.Khan						① Service Verified w.e. From 23-08-2014 To 31-8-2015 from the Acq: Roll and other Record.	 Distt: Edu: Officer (Female) D.I.Khan	
		Recovery of Absent Period of 9 months Total Amount of Reuy Rs 110554/- Rate of Reuy Rs 2000/pm DATE of Reuy Start 1-9-2016					<b>ATTESTED</b>	
			 District Education Officer (Female) Dera Ismail Khan,				 FAHM BANAZ SS (H/Gr) SC-17 GHSS, Kach, D.I.Khan	
		Reuy Rs 2000/pm Reuy Started on 4/16 Total Reuy Rs 110554/-  						



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 rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Servant
درجہ ملازمت	عارضی - مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پنشن کا مستحق ہے	تجواہ بطور عارضی ملازمت	زائد تجواہ بطور قائم مقام	ماسوائے تجواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم

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دستخط  
رجاز

Allowed Step/Scale upgradation from BPS-01 to BPS-03 w.e.f 01-7-2015 vide Govt. of KPK FD Regulation No: FD/50 (FR) 7-20 dt: 06/15

Departmental fixation is as under

Paym 23-08-2014	BPS-01	4800-
01-12-2014	-	4800-
01-07-2015	RBPS-01	6210-
01-07-2015	BPS-03	(6795) - NIA&PM
01-12-2015	-	6795 - determined
01-07-2016	RBPS-3	(8360) Beneficial Scale/Rent

6210, 15  
8365/3 '16

**Dist: Edu: Officer (Female) D.I. Khan**

General Postward

Pay Scales

Aq. 6210 = 125 = 12060

Pay Fixed @ Rs. 6210

R.B.P.S. 8240 - 325 = 12790

Pay Fixed @ Rs. 8365

Date of Next increment: 01-12-2016

8365/35-03

APPROVED

Approved

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  دستخط افسر مجاز	Date of termination or appointment  تاریخ انقطاع ملازمت	Reason of termination (such as promotion transfer dismissal etc)  وجوہات انقطاع ملازمت ترقی۔ تبادلہ یا برطرفی	Signature of the Head of the office of other attesting Officer  دستخط افسر مجاز	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitabale to another Government چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین		Signature of the head of the office or other Attesting officer  دستخط افسر مجاز	Reference to any recorded punishment or censure, or reward or praised of the Government servant سزایا جزایا غیر مناسب کارکردگی کارپکارڈ
				Name and duration of leave taken رخصت کی نوعیت ومعیاد	Period عرصہ		

**DEPARTMENTALY FIXATION**

Award of Premature Increment w.e.from 01.07.2014 vide Finance Deptt: Notification No. FD/SO(SR-1) 2/123/2014 Dated 14.07.2014 and Award of 2 Steps up-gradation of Class-IV vide Finance Deptt: Notification No. FD/SO/(FR) 7-20/2015 Dated 30.06.2015

PAY ON 03.08.2014 ( <del>Premature</del> Inct.)	Rs. 4800/Pm.
PAY ON 01.12.2014 ( <del>Premature</del> Inct.)	Rs. 4800/Pm.
PAY ON 01.07.2015 (BPS- 01)	Rs. 6210/Pm.
PAY ON 01.07.2015 (BPS- 03)	Rs. 6795/Pm.
with Premature Increment	
PAY ON 01.12.2015 (BPS-	Rs. 6795/Pm.

**ATTESTED**

*(Signature)*  
FATMA NAWAZ  
SS (HONORARY)  
GROSS ARITH. DIVISION

**UNDER TAKING**

I Mr. Muhammad Zubair Maghal hereby undertake that if any overpayment is made against me in the result of in-correct fixation, it will be recovered from my pay/ Pension

*(Signature)*  
Signature Employee

*(Signature)*  
Distt: Edu: Officer  
(Female) D.J.Khan

*(Signature)*

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 rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Servant
درجہ ملازمت	عارضی - مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پنشن کا مستحق ہے	متنخواہ بطور عارضی ملازمت	زائد متنخواہ بطور قائم مقام	ماسوائے متنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
BPS: 01 (7640-240-14840)			Rs.	Ps.	Rs.	Ps.	
N/Q David C.G.M.S. Bashi Drop. wali.					6609		12/15
35-01							
NR							
B.S-01					8129		12/16
NR							
		Revised Entries due to up. gradation of Post. BPS: 01 to BPS: 03. w. e. from 01-7-15.					
BPS: 03 (4080-325-17790)							
N/Q David C.G.M.S. Bashi Drop. wali, etc.					Rs. 6795/Per		01/7/2015
Do					Rs. 6795/Per		01/12/2015
BPS: 03 (8040-325-17790)							
N/Q David					Rs. 8365/Per		01/7/2016
Do					Rs. 8690/Per		01/12/2016

**ATTENDED**

Attested  
By (Signature)  
MHS, Kash. B. Khan

Attested  
(Signature)

Signature designa the Ha the offi oth Attes Office attestat columns  
تخت مجاز  
Distt (Fem)  
Distt (Fem)  
Distt (Fem)  
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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 of other attesting Officer	LEAVE		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
				Name and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitale to another Government		
				Period	Govt. to which debitale		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی - تبادلہ یا برطرفی	دستخط افسر مجاز	رخست کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین	دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کارپیکارڈ
Distt: Edu: Officer (Female) D.I.Khan					② 01-09-2015 To 30-06-2016	Service Verified w.e. From 01-09-2015 To 30-06-2016 from the Acq. Roll and other Record.	
Distt: Edu: Officer (Female) D.I.Khan				<b>ATTESTED</b>		Distt: Edu: Officer (Female) Dera ismail Khan	
			FATIMAH NAWAZ SS (H/Civ) BS-17 GHSS, Kach, D.I.Khan				
Distt: Edu: Officer (Female) D.I.Khan		30/11/2015 (A) Grant not due	Distt: Edu: Officer (Female) D.I.Khan				
Distt: Edu: Officer (Female) D.I.Khan		Seede Revised 30-6-2016	Distt: Edu: Officer (Female) D.I.Khan			TCA No. 177 Dated 6-2-17 Drawn Rs = 42973/- on a/c of award of B w.e.f 1-7-12 to 31-10-16 R/o	
Distt: Edu: Officer (Female) D.I.Khan		(A) Grant 30/11/16	Distt: Edu: Officer (Female) D.I.Khan				
Distt: Edu: Officer (Female) D.I.Khan		30/06/17 Seede Revised	Distt: Edu: Officer (Female) D.I.Khan				



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 of other attesting Officer	Name and duration of leave taken	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین Period Govt. to which debitable		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی - تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	عرصہ	گورنمنٹ جے رقم اداسوگی	دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کاریکارڈ
Distt: Edu: Officer (Female) D.I.Khan	30/11/17		A/Quint			③		
District Education Officer (Female) Dera Ismail Khan			Distt: Edu: Officer (Female) D.I.Khan			Service verified w.e.f. 01-07-2016 To 30-11-2017 from the Acq. Recd, and other office record.		
			ATTESTED				District Education Officer (Female) Dera Ismail Khan	
			FAHIM NAWAZ SS (H/Civ) BS-17 GHSS, Kach, D.I.Khan					
			Attested					



D 12

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN**

**OFFICE ORDER:-**

Mr, Mohammad Zubair N/Qasid working against GGMS, Strength 1 hereby transfer/ adjusted with post at GGMS, Basti Dhapanwali DIKhan in the interest of public service with effect from the date of taking over charge.

Note: -

1. No. TA/DA etc. is allowed.
2. Charge reports should be submitted as usual.
3. One N/Q post is hereby transfer /shifted from GGMS, strength to GGMS, Basti Dhapanwali DIKhan on 01/09/2015.

SD/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN.

Emdst No. 5241-49 Dated DIKhan the 28/8 2015

Copy of the above is forwarded for information: -

01. District Accounts Officer D.I.Khan
02. Programmer EMIS/Budget & Account Officer, Local Office.
03. Headmistress GGMS, Basti Dhapanwali DIKhan with the remarks to stick compliance the order.
04. Official Concerned

DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN

Distt. Edu. Officer  
(Female) D.I.Khan

**ATTESTED**

FAYYAZ NAWAZ  
SS (H/Civ) BS-17  
GHSS, Kach, D.I.Khan

E-13

SERVICE / WORKING CERTIFICATE.

Certified that Mr; Muhammad Zubair S/o Abdul Hameed has been working As Naib Qasid in Education Department since 23/08/2014 and now he is working at GGMS, Basti Dhapan Wali DIKhan w.e.f, 01.9.2015 to date. He is duty performed very regularly, honestly, punctual, without any break and the undersigned are entirely satisfied with performance of his work/duty.

Dated:29/08/2018.

*Zeena Hashem*  
Head Mistress  
G.G.M.S  
Basti Dhapanwali  
HEAD MISTRESS

GGMS, BASTI DHAPAN WALI DIKHAN.



Salary slip ( 00721532 April , 2016 ).PDF

**Dist. Govt. NWFP-Provincial**  
**District Accounts Office D.I.Khan**  
**Monthly Salary Statement (April-2016)**

**Personal Information of Mr MOHAMMAD ZUBAIR d/w/s of ABDUL HAMID**

Personnel Number: 00721532      CNIC: 1210114241729      NTN:  
 Date of Birth: 12.03.1984      Entry into Govt. Service: 23.08.2014      Length of Service: 01 Years 08 Months 009 Days

**Employment Category: Active Temporary**

Designation: NAIB QASID      80001697-DISTRICT GOVERNMENT KHYBE

DDO Code: DI6031-D O ( S&amp;L ) F DIK (TEM)

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No: 00721532 P73.V4 Interest Applied: Yes

GPF Balance: 4,539.00

Vendor Number: -

Pay and Allowances:      Pay scale: BPS For - 2015      Pay Scale Type: Civil      BPS: 01      Pay Stage: 2

Wage type		Amount	Wage type		Amount
0001	Basic Pay	6,600.00	1000	House Rent Allowance	891.00
1210	Convey Allowance 2005	1,785.00	1833	Integrated Allowance (2005)	300.00
1973	Adhoc Allowance 2011 @ 50%	1,485.00	2148	15% Adhoc Relief All-2013	720.00
2174	Adhoc Relief Allow-2014	480.00	2199	Adhoc Relief Allow @10%	660.00
5801	Adj Basic Pay	10.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3001	GPF Subscription - Rs 274	-274.00	3501	Benevolent Fund	-120.00
3511	Addl Group Insurance	-3.00	3604	Group Insurance	-58.00
3914	Education (ROP)	-2,000.00	3990	Emp.Edu. Fund KPK	-50.00
4200	Professional Tax	-10.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 0.00      Recovered till April-2016: 0.00      Exempted: 0.00      Recoverable: 0.00

Gross Pay (Rs.): 12,931.00      Deductions: (Rs.): -2,515.00      Net Pay: (Rs.): 10,416.00

Payee Name: MOHAMMAD ZUBAIR

Account Number: CA 3167-8

Bank Details: NATIONAL BANK OF PAKISTAN, 231420 SHAIKH YOUSAF BRANCH D.I.KHAN, D.I.KHAN

Leaves:      Opening Balance:      Availed:      Earned:      Balance:

Permanent Address:

City: DIKHAN

Domicile: NW - Khyber.Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

**ATTESTED**

**FARIHA NAWAZ**  
**SS (H/Civ) BS-17**

GHSS, Kach, D.I.Khan.

# بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (زنانه) ڈیرہ اسماعیل خان

15-9-2016

## Appeal for Just/Reguler Pay Dues/Recovery of Over Payment

جناب عالیہ

گزارش ہے کہ سائل کا بیٹا محمد زبیر GGMS جی دھپال والی میں بطور نائب قاصد خدمات سرانجام دے رہا ہے مگر شومی قسمت کہ جب سے میرا بیٹا ایجوکیشن میں آگست 2014 میں بھرتی ہوا ہے، DEO آفس کا عملہ اور خاص کر اکاؤنٹنٹ صاحب میرے بیٹے سے زیادتی پہ زیادتی کر رہا ہے اور لالچ کی خاطر کبھی تنخواہ بند کر دیتا ہے کبھی کھول دیتا ہے کبھی بینک میں نہیں جاتی اور کبھی تنخواہ کی لسٹ میں نام نہیں ہوتا۔

1 اس سے پہلے سائل کے بیٹے کی اکاؤنٹنٹ صاحب نے نومبر 2014 میں تنخواہ بند کی تھی پھر اپریل 2015 میں کھول دی تھی۔ اور اب پھر جولائی 2016 میں تنخواہ بند کر دی گئی تھی، بغیر کسی قانونی تقاضے پورے کیے۔ دفتر والے تنخواہ بند کرنے کا سروس فارم دکھاتے ہیں اور نہ ہی کسی مجاز افسر کے تنخواہ بند کرنے کا لیٹر دکھاتے ہیں اور نہ ہی کوئی سروس فارم کارپیکارڈ DAO میں ملتا ہے۔

2 اس کے علاوہ میرے بیٹے کی تنخواہ میں کوئی وجہ بتلائے بغیر ریکوری -/110554 روپے -/2000 روپے مہینہ اپریل 2016 سے شروع کی گئی ہے۔ اور سروس بک میں آٹھ مہینے لم سم فیئر حاضری لکھی گئی ہے۔ جس میں کسی بیڑیڈ کا ذکر نہیں ہے۔ جب کہ سروس بک میں DEO صاحبہ نے تمام انٹری پر دستخط اور سروس Verified بھی کر دی تھی۔ پھر اچانک ایک سال کے بعد بوس کاروائی کر کے زیادتی کی گئی ہے۔ نہ کوئی میرے بیٹے کو کوئی صفائی کا موقع دیا گیا ہے اور نہ ہی کوئی وجہ بتائی گئی ہے۔

3 اس کے علاوہ ہم نے انصاف کے لیے DEO صاحبہ کو تحریری طور پر 2015-01-21، 2015-01-26، 2015-02-26، 2016-05 اور 2016-08-06 کو اپنی رازداری پیش کر چکے ہیں آج تک ہمیں کسی بھی درخواست کا تحریری رزلٹ نہیں ملا ہے۔

4 میرے بیٹے کی ریگولر تنخواہ مارچ 2015 اور جولائی 2016 کی ابھی تک بقایا ہے۔

5 میرے بیٹے کو بار بار التجا کرنے کے باوجود ابھی تک بھرتی سے لے کر اب تک میڈیکل الاؤنس -/1500 روپے نہیں مل رہا ہے۔

6 میرے بیٹے کو گورنمنٹ کے قوانین کے مطابق BPS-1 to BPS-3 کا اپگرڈیشن کے بقایا جات نہیں ملے ہیں اور نہ ہی سروس بک میں کوئی کام ہوا ہے۔ جس کے لئے ہم نے مئی 2016 میں درخواست بھی دی ہے۔

7 آپ سے التماس ہے کہ آپ مذکورہ اکاؤنٹنٹ کی اندھیر نگری جاننے کے لئے ڈل سکول کی بجٹ کاپی کی پونٹیں جون 2013 تا اگست 2016 اور گزٹل ڈل سکول کی Breakup of Posts کی تفصیل چیک کر لیں جس میں میڈیکل اور نان میڈیکل سٹاف کی تفصیل درج ہیں۔ آپ کو خود بہ خود معلومات حاصل ہو جائیں گی۔

میں آپ سے امید کرتا ہوں کہ آپ کی گزارشات کو مدنظر رکھ کر آپ ضرور انصاف کے تقاضے پورے کریں گے۔ اور غیر جانبدار انکوائری کرائی جائے تاکہ ذاتیات کرنے والے کو سزا ملے۔

آپ کی عین نوازش ہوگی

ATTESTED

FAHIM NAWAZ  
GS (HCiv) BS-17

WSS, Kach, D.I. Khan

عارض

عبدالحمد ولد غلام سرور گاؤں وڈا کھانہ کچھ تحصیل ضلع ڈیرہ اسماعیل خان / والد محمد زبیر نائب قاصد GGMS ہستی دھپال والی ڈیرہ اسماعیل خان

کاپی برائے اطلاع اور فوری کارروائی کی اپیل :-

1 وزیر اعلیٰ کمپلیٹ سیل KPK پشاور

2 صوبائی احتساب کمنشنر KPK پشاور

3 ڈپٹی کمشنر KPK E & SED پشاور کمپلیٹ سیل ایجوکیشن پشاور

4 ڈپٹی کمشنر ڈیرہ اسماعیل خان

No. 155

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

Received a registered letter addressed to \_\_\_\_\_

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

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_

Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_

Name and address \_\_\_\_\_

خدمت جناب ڈائریکٹر ایجوکیشن (E&SED) خیبر پختونخواہ پشاور  
Against ~~Defalcation~~ Illegal Deduction  
Appeal ~~XXXXXXXXXX~~ Recovery of Over Payment

ان :-  
ب عالیہ!

گزارش ہے کہ سائل محکمہ تعلیم میں بطور نائب قاصد مورخہ 23-08-2014 سے Regular خدمات سرانجام دے رہا ہے۔  
سائل کی Accountant گزٹڈ مل سکول اور دفتر ہڈانے اپریل 2016 سے -/110554 آٹھ ماہ کی لم سم ریکوری کی سروس بک میں  
انٹری کی ہوئی ہے اور -/2000 روپے ہر ماہ پے رول سے ریکوری کر رہے ہیں۔ اور یہ تمام کام بغیر کسی قانونی کارروائی کے کیا گیا ہے۔ جس میں  
نتو کسی پیریڈ کا ذکر ہے جو کے مجھ سے زیادتی اور نا انصافی کی گئی ہے۔

سائل کو دفتر یا اکاؤنٹنٹ صاحب کی طرف سے نہ کبھی کوئی لیٹرائٹو کیا گیا اور نہ وارنگ دی گئی نہ کوئی شو کا ز نوٹس نہ Explanation  
call اور نہ ہی کوئی Personal Hearing کی گئی ہے اور نہ ہی دفتر والے مجھے کوئی ریکارڈ دکھاتے ہیں نادیتے ہیں جو کے غیر  
اخلاقی اور غیر قانونی ہے۔

سائل کے خلاف E&D رولز کے تحت نہ کوئی کارروائی کی گئی نہ ہی سائل کو E&D رولز کے تحت صفائی کا موقع دیا گیا۔  
جبکہ سائل کی 23-08-2014 تا 30-11-2017 تک کی پیریڈ تک متعلقہ DEO/DDO صاحب نے Service  
Verification بھی کر دی تھی جسکی بعد میں ریکوری اور غیر حاضری کا کوئی قانونی جواز نہیں بنتا ہے۔

اس سے پہلے سائل اپنی دادرسی حل کرنے کیلئے متعلقہ DEO فی میل ڈیرہ اسماعیل خان کو درخواست ہاپیش کر چکا ہے مگر کسی پر عمل درآمد  
نہیں ہوا اس لئے اب با امرے مجبوری اپنی دادرسی آپ کو حل کرنے کیلئے پیش کرنے کی جسارت کر رہا ہے۔  
اسلئے میری آپ التماس ہے کہ میری غیر قانونی ریکوری کو ختم کیا جائے اور جو ریکوری کی گئی ہے وہ مجھے دوبارہ واپس کی جائے مجھ غریب  
کلاس فور سے زیادتی کی ~~میں~~ اور میری ریکوری کو ختم فرمایا جائے بندہ دعا گور ہے گا۔ بعد از بندہ عدالت جانے کا حق  
محفوظ رکھتا ہوں

FAHIM NAWAZ  
96 (H/Civ) BS-17  
GMS, Kach, D.I.Khan

آپ کی عین نواز ہوگی

ارض

مورخہ: 12/10/2018

محمد زبیر نائب قاصد GGMS بستہ دھپانوالی ڈیرہ اسماعیل خان

Certified that above name Class-IV of this school has been Performing Du  
Regurly,Honestly with out any break/Leave Science 01-09-2015 to till date and !!  
Undersigned are entirely Satisfied with the performance of his work/duty.

Head Mistress  
G.G.M.S  
Basti Dhapanwall  
D.I.Khan. Head Mistress  
G.G.M.S  
Basti Dhapanwall  
D.I.Khan

No. 311 For Insurance Notice see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.  
Received a registered letter addressed to \_\_\_\_\_ Date-Stamp \_\_\_\_\_  
Initials of Receiving Officer \_\_\_\_\_  
Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.  
Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_  
Weight \_\_\_\_\_ Kilob Grams  
Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_  
Name and address of sender \_\_\_\_\_



PIR GILAN KHAN

Advocate  
bc-18-1199  
Date of issue: December 2018  
Valid upto: December 2021



ADVOCATE

# وکالت نامہ

کورٹ  
فیس

خواجہ محمد اسرار سید صاحب - خواجہ شہزاد سید صاحب - خواجہ شہزاد سید صاحب  
خواجہ شہزاد سید صاحب - خواجہ شہزاد سید صاحب - خواجہ شہزاد سید صاحب

خواجہ شہزاد سید صاحب  
خواجہ شہزاد سید صاحب  
خواجہ شہزاد سید صاحب

Service No 1219

باعث خیر آنک

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جواب دہی برکھنے کی پیشی یا تصفیہ مقدمہ نامہ  
خواجہ شہزاد سید صاحب

کو سب ذیل شرائط پر اکیل مقرر کیا ہے کہ جس پیشی پر خود یا بڑا بذریعہ رو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت پانچسے چالیسے مقدمہ وکیل صاحب  
موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب  
موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل  
پیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے  
پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔  
کوکل ساختہ پر وادتہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعوی یا جواب دعوی یا درخواست اجراء اسمائے ذمیری  
نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر پائی یا راضی نامہ و فیملہ رسلت کرنے اقبال دعوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے  
تاریخ پیشی مقدمہ مزکور بیرون از پکھری صدر پیروی مقدمہ مزکور نظر ثانی اپیل و گمرانی و درآمدگی مقدمہ یا منقوئی ذمیری یک طرفہ یا درخواست حکم اتہانی یا قرتی  
یا گرفتاری قبل از فیصلہ اجراء ذمیری بھی صاحب موصوف کو بشرط ادا ہنگی علیحدہ علیحدہ مقرر کریں گا اور تمام ساختہ پروادتہ صاحب موصوف مثل کردہ  
از خود منظور قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ تمام اختیار ہو کہ مقدمہ مزکورہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی  
اپیل گمرانی یا دیگر معاملہ و قدم مذکورہ کسی دوسرے وکیل یا پیر سر کو اپنے بجائے یا اپنے امراء مقرر کریں اور ایسے شیر تانوں کو بھی ہر امر میں وہی اور واپس  
اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو جگہ ہر جگہ اتواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر  
صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت  
میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہو گا

لہذا وکالت نامہ لکھو دیا ہے تاکہ سند ہے  
22 - طبری 2019  
مورثہ  
مضمون وکالت نامہ میں لیا ہے اور اچھی طرح لکھا ہے اور منظور ہے

Samuel Khan  
Mr. M. Zubair  
Appellant  
Accepted  
Accepted

22/11/19  
حسن کا پیر شہزاد سید خان دربار کیٹ باغیچہ جازوئی ڈیرہ اسماعیل خان

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR, CAMP**  
**COURT D.I.KHAN**

**Service Appeal No. 121 / 2019**

**Appellant:**           **Mr. Muhammad Zubair**           (Naib Qasid GGMS Basti Dhappan Wali,  
Dera Ismail Khan)

**VS**

**Respondents:**       **Government of Khyber Pakhtunkhwa (Secretary KPESE)**

**REPLY ON BEHALF OF RESPONDENTS**

<b>S.No.</b>	<b>DESCRIPTION OF DOCUMENTS</b>	<b>Pages</b>
1	Para-wise Comments on Behalf of Respondent	1-3
2	AFFIDAVIT	4
3	AUTHORITY	5
4	Annexure A	
5	Annexure B	
6	Annexure C	
7	Annexure D	
8	Annexure E	
9	Annexure F	
10	Annexure G	



**DEPONENT**

**Dr. Muhammad Imran Shah**  
Subject Specialist (BS 18)  
as  
**LITIGATION OFFICER**  
O/O DEO (F), D.I.Khan  
12101-2797412-1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR,**  
**CAMP COURT D.I.KHAN**

**Service Appeal No. 121 / 2019**

**Appellant:** Mr. Muhammad Zubair (Naib Qasid GGMS Basti Dhappan Wali,  
Dera Ismail Khan)

***Versus***

**Respondents:**

1. Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa.
3. District Education Officer, (Female) D.I.Khan.
4. District Accounts Officer, D.I.Khan.

**PARA-WISE COMMENTS ON BEHALF OF RESPONDENTS**

**Respectfully Sheweth:**

The respondents humbly submit the following:

**PRELIMINARY OBJECTIONS:**

1. That the Appellant has not approached this Honorable Tribunal Clean Handed.
2. That the service Appeal of the Appellant is not based on truth and is not filed to seek justice as per Natural Law of Justice.
3. That this service appeal filed dated 23.1.2019, (after 3 years) is badly time-barred as the Recovery of salaries due to willful absence has been started from 04/ 2016.
4. That the Appellant was a lethargic Employee, being without duty performance at his place of duty. Hence the appellant has received salaries for the absent period without performing any duty.
5. That the Appellant has usurped the salaries for the absent period of 8months from Government treasury without performing duty and even no leave has been sanctioned in this regard prior to absenting himself from the place of duty.
6. That the **penalty of recovery of salaries** order for 8 months worth Rs. 110554/- @ Rs.2000/month has been Passed/ issued after thoroughly seeing the rule of Law.
7. That, being based on lies, this service appeal is liable to be dismissed with cost.

⑥ In view of the above submissions, the respondents humbly pray that the service appeal of the appellant may please be dismissed with cost and that the **recovery of salaries** Order may stay in field.

**OBJECTIONS ON FACTS:**

- 1. Para pertains to start of service:** But the appellant did not properly honor his appointment order as per his behavior of habitually absenting himself from place of duty.
- 2. Para pertains to taking charge of service:** But the appellant did not properly honor his appointment order as per his behavior of habitually absenting himself from place of duty for 8 months. No attendance record has been observed on part of the appellant in office of the DEO (Female) D.I.Khan.
- 3. Para pertains to transfer of service:** But the appellant did not properly honor his transfer order as per his behavior of habitually absenting himself from place of duty. No attendance record has been observed on part of the appellant in office of the DEO (Female) D.I.Khan for the period of 8 months; hence the penalty of recovery of salaries for 8 months worth Rs. 110554/- @ Rs.2000/month was imposed and duly entered to the service book records of the appellant as and when started.
- 4. Denied:** absenting himself for 8 months and recovery worth Rs. 110554/- @ Rs.2000/month has been duly entered to his service book records.
- 5. Denied:** willful absentee has been observed on part of the appellant in office of the DEO (Female) D.I.Khan for the period of 8 months; hence the penalty of recovery of salaries for 8 months worth Rs. 110554/- @ Rs.2000/month was imposed.
- 6. Denied:** no such appeal has been found in verbal or written format on part of the appellant at office of the DEO (Female), D.I.Khan as and when the recovery has been started in 2016 or 2017. Actually, the appellant knew the reason of why the penalty of recovery of salaries for 8 months worth Rs. 110554/- @ Rs.2000/month was imposed.

*Hence, the service Appeal of the appellant may kindly be dismissed being not based on facts.*

**OBJECTIONS ON GROUNDS:**



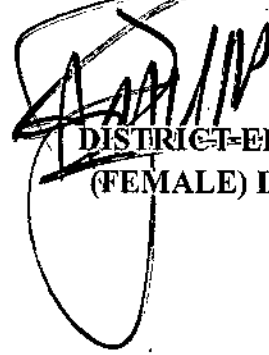
- A. Para is incorrect; hence, denied:** No attendance record has been observed on part of the appellant in office of the DEO (Female) D.I.Khan for the period of, 8 months; hence the penalty of recovery of salaries for 8 months worth Rs. 110554/- @ Rs.2000/month was imposed and duly entered to the service book records of the appellant as and when started.
- B. Para is incorrect; hence denied.** The impugned Recovery of salaries Order has been passed after observing all codal formalities and as per lawful authorizes conferred upon this servant.
- C. Strictly Denied:** That this service appeal, filed dated 23.1.2019, (after 3 years) is badly time-barred as the Recovery of salaries due to willful absence has been started from 04/ 2016.

**D. Para is incorrect; Hence denied.** The impugned Recovery of salaries Order has been passed after observing all codal formalities and as per lawful authorizes conferred upon this servant.

**E.** That the appellant had been willfully absent from duty, he usurped salaries illegally without performing duties. Hence this Honorable Tribunal is implored to dismiss this Service Appeal with cost; besides it is time-barred too.

**F.** That the learned counsel for the respondents may graciously be allowed by this Honorable Tribunal to raise further grounds during the course of arguments.

*In view of the above submissions, the respondents humbly pray that this service appeal of the appellant may please be dismissed with cost and the Recovery of pay Order of this appellant from the month of 4.2016 may be allowed to stay in field.*



**DISTRICT-EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN**



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR, CAMP**  
**COURT D.I.KHAN**

**Service Appeal No. 121 / 2019**

**Appellant: Mr. Muhammad Zubair** (Naib Qasid GGMS Basti Dhappan Wali,  
Dera Ismail Khan)

**VS**

**Respondents: Government of Khyber Pakhtunkhwa (Secretary KPESE)**

**AFFIDAVIT**

Dr. Muhammad Imran Shah, Subject Specialist (BS-18), GHSS Muryali, D.I.Khan, Litigation Officer, Office of the DEO (F) D.I.Khan, representing on behalf of District Education Officer (Female) D.I.Khan, in above titled Service Appeal, do hereby solemnly affirm on oath that all the contents of Para-wise comments are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honorable Tribunal.

 Respondent

*Mrs. Syedda Anjum*  
**DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN**

 DEPONENT

**Dr. Muhammad Imran Shah**  
**Subject Specialist (BS 18)**  
as  
**LITIGATION OFFICER**  
**O/O DEO (F), D.I.Khan**  
**12101-2797412-1**

**IDENTIFIED BY**

**DISRICT ATTORNEY  
DERA ISMAIL KHAN**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR, CAMP**  
**COURT D.I.KHAN**

**Service Appeal No. 121 / 2019**

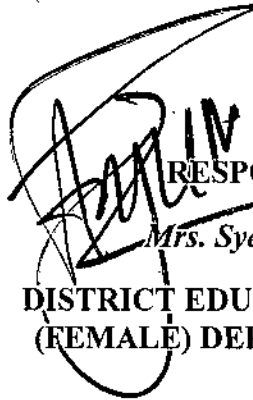
**Appellant: Mr. Muhammad Zubair** (Naib Qasid GGMS Basti Dhappan Wali,  
Dera Ismail Khan)


**VS**

**Respondents: Government of Khyber Pakhtunkhwa (Secretary KPESE)**

**AUTHORITY**

I, Mrs. Syedda Anjum, District Education Officer (Female), D.I.Khan do hereby authorize Mr. Dr. Muhammad Imran Shah, Subject Specialist (BS-18), GHSS Muryali, D.I.Khan, working as Litigation Officer Office of the DEO(F) D.I.Khan, to **represent and submit Para-wise comments / reply** on behalf of the Respondent, the District Education Officer (Female) D.I.Khan, before The Honorable Khyber Pakhtunkhwa Service Tribunal, Camp Court D.I.Khan till the final Judgment in the above titled Execution Petition / Service Appeal.

  
**RESPONDENT**  
*Mrs. Syedda Anjum*  
**DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN**

  
**DEPONENT**  
*Dr. Muhammad Imran Shah*  
12101-2797412-1  
Subject Specialist (BS 18)  
GHSS Muryali, D.I.Khan  
as  
**LITIGATION OFFICER  
O/O DEO (F), D.I.Khan**

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA PESHAWER CAMP AT D.I.KHAN.**

Appeal No: 121 OF /2019

Muhammad Zubair Mughal S/o Abdul Hameed Mughal Naib Qasid  
GGMS Basti Dhapan Wali D.I.Khan.

**“VERSUS”**

1. Govt of Khyber Pakhtunkhwa through Secretary Education Govt of KPK Peshawar.
2. Director Education Elementary & Secondary Khyber Pukhtunkhwa Peshawar.
3. District Education Officer (Female) D I Khan.
4. District Accounts Officer D I Khan.

**Respectfully (Sheweth)**

Para wise Reply of the respondent No (4) is as under:

Para (1) Incorrect/Not Admitted Para not related to Respondent No (3).

Para (2) As above para no 01.

Para (3) As above para no 01.


Para (4) Incorrect /Not Admitted Para not related to Respondent No (4) being administrative matter.

Para (5) Incorrect /Not Admitted Para not related to Respondent No (4) being administrative matter.

Para (6) Incorrect /Not Admitted Para related to Respondent No (3) being administrative matter.

Para (7) Incorrect /Not Admitted Para related to Respondent No (2) being administrative matter.

It is therefore, humbly prayed that as acceptance of above mentioned para wise reply, that the name of Respondent No (4) may graciously be exclude from the penal of Respondents.

  
**District Accounts Officer,**  
Dera Ismail Khan.  
(Respondent No 4)

**BEFORE THE HONOURABLE SERVICE TRIBUNAL**  
**KHYBER PUKHTUNKHWA PESHAWER**

Appeal No: 121 OF /2019


Muhammad Zubair Mughal S/o Abdul Hameed Mughal Naib Qasid  
GGMS Basti Dhapan Wali D.I.Khan.

**“VERSUS”**

5. Govt of Khyber Pakhtunkhwa through Secretary Education Govt of KPK Peshawar.
6. Director Education Elementary & Secondary Khyber Pukhtunkhwa Peshawar.
7. District Education Officer (Female) D I Khan.
8. District Accounts Officer D I Khan.

**AFFIDAVIT**

I Mr. Saeed-ur-Rehman Distt Comptroller of Accounts Dera Ismail Khan do hereby solemnly affirms and declare that All the contents of para wise reply submitted by the Respondent No (4) are true and Correct to the best of my knowledge and belief. That nothing has been Concealed the Honorable Court.

  
**DEPONENT'S**  
District Accounts Officer  
D I Khan

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

**Service .A No.121-D/2019**

**Muhammad Zubair**

**Verses**

**Govt of KPK**

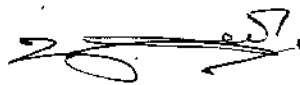
Misc petition for placing on record the impugned order no 6050 dated: 23-06-2016.

Respectfully Sheweth:-

1. That above titled Appeal is pending adjudication before this Honourable Court and is fixed for 21/09/2020.
2. That in the above titled appeal the appellant has been questioned the recovery / deduction of amount Rs110,554/- from the salary of the petitioner of Rs. 2000/- per month. Actually the respondent authority made allegation that you / appellant being petty employee remained absent from duties although the period has not been mentioned. The appellant being aggrieved from the omission and in action aforementioned submitted departmental appeal which was not decided with in stipulated period. The appellant tried his best to collect the impugned order but in vain, at that time. Now a few days ago the appellant got the impugned order, which want to be place on file for exhibition and just decision of the case , copy of the enclosed as Annexure I.
3. That this honourable tribunal has got very vast and extensive powers to entertained the instant application

**Therefore, it is humbly requested that  
the application may kindly be accepted.**

**Petitioner**



**Muhammad Zubair**

Through Counsel



**Peer Ghulam**

Advocate

Date: 21/09/2020

21/9/20

**OFFICE OF THE DISTRICT EDUCATION  
OFFICER (FEMALE) D.I.KHAN**

No. 6050

The Dated 23/04/2016

TO:

THE DISTRICT ACCOUNTS OFFICER  
DERA ISMAIL KHAN.

**SUBJECT: RECOVERY OF PAY**

It has come to the notice of this office that following class-ivs servants working in the GGMS strength remained absent further duties for the period noted against him and he got their pay regularly. The absent period has been converted as leave pay by this office, therefore the recovery of pay calculated and mentioned against his name may please be recover from his salary in easy installment w.e.f 01-04-2016.

The detail given below.

S.No	Name	Personal No	Total amount of Recovery	Rate Of Recovery
1	Muhammad Arif N/Q	00727036	Rs.110554	Rs.2000 per month
2	Syed.Qamar Abbas SWP	00726459	Rs.110554	Rs.2000 per month
3	Fazal Karim SWP	00726455	Rs.110554	Rs.2000 per month
4	Saqib Mehmood N/Q	00703830	Rs.110504	Rs.2000 per month
5	Muhammad Zubair N/Q	00721532	Rs.110554	Rs.2000 per month
6	Muhammad Kamal N/Q	00723521	Rs.110504	Rs.2000 per month

DISTRICT EDUCATION OFFICER  
(FEMALE)DERA ISMAIL KHAN

Endst: No. 6051

Dated: 23/04/2016

Copy to the:-

1. The Director E&SE KhyberPakhtunKhaw.

District Education Officer  
(Female) Dera Ismail Khan

District Education Officer  
(Female) Dera Ismail Khan  
DISTRICT EDUCATION OFFICER  
(FEMALE)DERA ISMAIL KHAN



**OFFICE OF THE DISTRICT EDUCATION**  
**OFFICER (FEMALE) D.I.KHAN**

No. 6050

The Dated 23/04/2016.

TO;


THE DISTRICT ACCOUNTS OFFICER  
DERA ISMAIL KHAN.

**SUBJECT: RECOVERY OF PAY**

It has come to the notice of this office that following class-ivs servants working in the GGMS strength remained absent further duties for the period noted against him and he got their pay regularly. The absent period has been converted as leave pay by this office, therefore the recovery of pay calculated and mentioned against his name may please be recover from his salary in easy installment w.e.f 01-04-2016.

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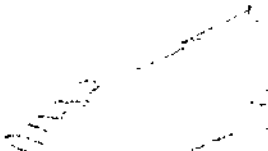
  
DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN


Endst: No. 6051

Dated: 23/04/2016.

Copy to the:-

1. The Director E&SE KhyberPakhtunKhow.

  
District Education Officer  
(Female) Dera Ismail Khan

  
District Education Officer  
(Female) Dera Ismail Khan  
DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN