05.01.2023

Appellant in person present and counsel for private respondents present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the official respondents present.



Appellant submitted an application that adjournment wherein he stated that his counsel is not available today. Application has placed on file last chance is given to the appellant to argue the case on the next date positively. To come up for arguments on 05.04.2023 before D.B.

(Mian Muhammad) Member (E) (Kalim Arshad Khan) Chairman 10.10.2022

Appellant alongwith his counsel present. Mr. Usman Bahadur, Progress Officer alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for official respondents No. 1 to 3 present. Mr. Muhammad Khan, Advocate for private respondents No. 6 to 9 present. None present on behalf of private respondents No. 4 & 5.

Previous date was changed on Reader note, therefore, respondents No. 4 & 5 be summoned through registered A/D and to come up for their reply as well as arguments before the D.B on 28.11.2022.

Appellant is directed to submit registered A/D within 03 days in

office.

(Mian Muhammad) Member (E)

(Salah-Ud-Din) Member (J)

28.11.2022

Learned counsel for the appellant present. Mr. Habib Nawaz, A.D alongwith Mr. Muhammad Jan, District Attorney for official respondents No. 1 to 3 present. Learned counsel for private respondents No. 6 to 9. None present on behalf of respondents No. 4 & 5 despite being summoned through registered post, hence placed ex-parties.

Learned counsel for private respondents No. 6 to 9 sought time for preparation of arguments. Adjourned. To come up for arguments on 05.01.2023 before the D.B.

(Mian Muhammad)

Member (E)

(Salah-Ud-Din) Member (J)

28.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 02.06.2022 for the same as before.

2-6-2022 Proper DB not available the is adjourned to 15-8-2022

Roader

15.8.22

Due to Summer vacation, the case is adjourned to 10.10.22 for the Same.

Reader

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.

Chairman

.10.2021

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate-General for official respondents No. 1 to 3 Advocate, Khattak, Muhammad 🖫 Khan Mr. respondents No. 6 to 9 present and submitted reply/comments on behalf of the said respondents, copy of which handed over to the appellant. He further stated that respondents No. 4 & 5 have contacted him and he will submit Wakalat Nama as well as comments on behalf of the said respondents on the next date. Comments on behalf of official respondents No. 1 to 3 have already been submitted in office, which are placed on file. Copy of the same also handed over to the appellant. Adjourned. To come up for reply/comments on behalf of respondents No. 4 & 5 as well as arguments before the D.B on 28.02.2022.

(Mian Muhammad) Member (E) (Salah-Ud-Din) Member (J) Appeal No. 7726/2020 Mansoor Islam vs Gost

26.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 17.06.2021 for the same as before.

Reader

17.06.2021

Appellant in person and Mr. Kabirullah Khattak, Addl. AG alongwith Amjad Islam, Assistant for official respondents present. Nemo for private respondents.

Learned AAG seeks time to submit reply/comments on behalf of official respondents. He is required to contact the official respondents. Fresh notices be issued to private respondents. All the respondents are required to submit written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 29.10.2021 before the D.B.

barman

11.11.2020

Nemo for the appellant.

Since the Members of the High Court as well as of the District Bar Associations, Peshawar, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 27.01.2021 on which date to come up for further

proceedings before S.B.

(Muhammad Jamal Khan) Member (Judicial)

27.01.2021

Mr. Abdul Nasir Khattak, Advocate, for appellant is present.

The learned counsel for appellant contended that the respondents department issued notification regarding amendment in appointment and promotion policy vide notification no. SO(LG-I)2-188 SSRC/2018/981 dated 5th April 2018 which has been further amended through notification No. SO(E)L.G/2-188/SSRC/2019 dated 16th October 2019. Accordingly, 20% promotion to the post of Village Secretary was made from amongst the Naib Qasid and Chowkidar in Village Council at Tehsil level having SSC qualification in Second Division from recognized Board and six month diploma in IT from recognized Board with three years services. Appellant was fully qualified and eligible for promotion however, respondent No. 3 deprived the appellant from his due right and mala-fidely promoted private respondents No. 6 to 9 by means of an invalid order and against seniority rules by compiling a unique type of seniority list which is contrary to the principles and precedent of seniority vide impugned order No. 691/AD LG KK dated 18.02.2020. That clandestinely the orders were kept secret, however, appellant had already assailed the seniority list. Departmental appeal moved for the purpose but the same remained undecided even after the expiry of the statutory period of 90 days hence, the present service appeal.

The point so agitated at the bar needs consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 26.04.2021 before

S₄B.

(MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)

Form- A

FORM OF ORDER SHEET

Court of			
	- 5		
	7726		
e No	, , , ,	/2020	

	Date of order proceedings	Order or other proceedings with signature of judge
1.	. 2	3
1-	13/07/2020	The appeal of Mr. Mansoor Islam presented today by Mr. Abdu Nasir Khattak Advocate may be entered in the Institution Register and pu
·	,	up to the Worthy Chairman for proper order please
		REGISTRAR
2-		This case is entrusted to S. Bench for preliminary hearing to be put up there on 999200
		CHAIRMAN
	09.09.2020	Appellant in person present.
•		An application for adjournment has been submitted or
		the ground that learned counsel for the appellant in
		Lengaged before the Peshawar High Court, Peshawar Rench
		engaged before the Peshawar High Court, Peshawar Bench Bannu today.
		Bannu today.
		Bannu today.
		Bannu today. Adjourned to 11.11.2020 before S.B.
		Bannu today. Adjourned to 11.11.2020 before S.B.
		Bannu today. Adjourned to 11.11.2020 before S.B.

BEFORE THE KP, SERVICE TRIBUNAL, PESHAWAR SERVICE 7726/2020

Mansoor Islam

.....Petitioner

Versus

Government of KPK & Others

Subject: Application for Adjournment

Respectfully Sheweth,

The Petitioner (Appellant) submit as under;

- 1. That the aborated service appeal is Pending adjudication before This Hon'ble tribunal and has been fixed for arguments for today.
- 2. That Counsel for the Appellant Abdul Nasir Khattak Advocate is ill (Patient) and is unable to appear before the Hon'ble tribunal.

So, it is, therefore humbly prayed that on acceptance of this application hearing of the appeal may kindly be adjourned.

Dated 05-01-2023

Appellant

Mansoor Islam

Consultant Onhopedic Surgeon Dr. Ziaullah K MBBS, MCPS (Surgery), FCPS (Orthopi Poet Graduate Felicieship Orthopedic Tra Member of Pakistan Orthopedic Association Cirthopaerac Urvi Hayatabad Medical Co. Pashawar eler Ficully - Tab. Elin N. Cey (10) - 177 Tab. Elinil Good - Tab. Nise 160 いんかんだらりか Rd.leg The state of the s PNO Sign of worther there let Valid For Court



TAK CLINICAL LAB

Cell: 0346-5806611

Potlent Nome: Abdul Nosir

Sex:

Mole

Age:

years

Referred By:

Dr Zolulloh Ktk

Patient Id:

452

Sampling Date: 3-Jan-23

Reporting Date: '3-Jon-23

Specimen:

Blood

FULL BLOOD COUNT

4.67

HA	F١	ለበ	GI.	<u> </u>	liN
4 117			UL	ur	una

HB% RBCS

14.0

6/dl millon/cmm M:14-18 F: 12-16

Female: 3.0 -4.0

Male: 3,5-4.5

TOTAL LEUCOCYTE COUNT

TLC PCV (HCT) MCV

10,100 37.7 79.8 fL

/cmm 4:

/cmin

4000-11000

M:40-45 F: 34-47

80-96

MCH MOHO

PLATELET COUNT

30.0 Pg 37.5 g/dl

Ad:-27-32,Ch:28-34 Ad: 30-35,Ch:28-34

100,000-300,000

DIFFERENTIAL LEUCOCYTE COUNT

Neutrophils Lymphocytes Monocytes

Eosinophil's

57 33 06

D4

000,8112

40---70

20-40 06-10

01-06

ADDRESS; HAFIZ RAFIO MARKET OPP. WOMEN & CHILOREN HOSPITAL



Type C HOSPITAL KARAK CITY

(Khyber Pakhtankhwa) RADIOLOGY DEPARTMENT

	Patient name	Abdul Nasir			_
1				? Years	1
i	Ref by	Dr. Zia Ullah	Date	03/01/23 10·52 AM	

Doppler ultrasound right lower limb

About 85cc thick collection seen in the right calf region. It is about 24mm deep to the skin surface. Site nurked

Few enlarge lymph nodes seen in the right inquinal region.

YENOU'S SYSTEM

High resolution B SCAN shows that right lower limb femore-popilical vessels have normal caliber without intraluminal defect.

Color Doppler shows normal color filling and wave pattern.

ARTERIAL SYSTEM

Anterior tiblul, posterior tibial and dorsalls pedis arteries shows normal caliber blood flow and wave pattern.

Impression: Normal Doppler Study + See Comments.



AK CLINICA

Patient Name: Abdul Nasir

Sex:

Male

Age: _

- years

Referred By:

Dr Zalulloh Ktk

Potlent ld: 452

Sampling Date: 3-Jan-23

Reporting Date: 3-Jan-23

Specimen: Blood

TEST

RESULT

UNIT

REFERENCE VALUE

CRP

4.0(Negative)

wit

10 16 1073/A
5.86 1073/A

ATTAK CLINICAL LAB

Coll: 0349-7874906 0348-5806611

ul Nasir

7/3

Juliah Ktk

Patient (d:

452

Sampling Date: 3-Jan-23

Reporting Date: 3-Jan-23

Specimen: Bload

FULL BLOOD COUNT

14.0 g/dl 4.67 million/cmm

M:14-18 F: 12-16

Female: 3.0 -4.0

Mole: 3.5 -4.5

TNU

10,100 /cmm 37.7 % 79.8 fL 30.0 Pg 37.5 g/dl

4000--11000 M:40-45 F: 34-47

80--96

Ad: 27-32,Ch:28-34

Ad: 30-35,Ch:28-34 100,000-300,Q00

DIFFERENTIAL LEUCOCYTE COUNT

Neutrophils
Lymphocytes
Monocytes
Eosinophil's

PLATELET COUNT

5118,000

% % .% %

/cmm

40---70

20—40 06—10

01-05

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JAWAD A

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AGORESS; HAFIZ RAFIO MARKET OPP. WOMEN & CHILDREN HOSPITAL KARAK CITY!



BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Mansoor Islam VERSUS

Secretary Govt: of KPK & Others

INDEX

S#	Description of Documents	Annex	Pages
1.	Appeal		1-6
2.	Affidavit.		3
3.	Memo of Addresses		2
4.	Copy of appointment order	"A"	q
5.	Copies of academic qualification etc	"B,C & D"	10-12
6.	Copy of Both Notifications	"E & F"	13-16
7. ∴∗	Copy of Impugned order No 691/A.D, LG. KK dated 18/02/2020	"G"	17
8.	Copies of Seniority List & Objection Petition	"H & I"	18-24
9.	Copy of Representation/ Departmental Appeal	"J"	25
10.	Copy of minutes of the Meeting dated 17/02/2020	"K"	26-27
11	Wakalat Nama		

Dated: 13/07/2020

Mansoor Islam

Chowkidar, Office of the

Assistant Director Local Govt:

& Rural Development Department

Karak

Through .

Abdul Nasir Khattak Advocate, D.B.A Karak

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Service Appeal No:____/2020

Mansoor Islam S/o Islam Badshah, Chowkidar, Office of Assistant Director, Local Government & Rural Development Department KPK.

(Appellant) Telbuant

<u>VERSUS</u>

Dated 13/7/2026

- 1. Secretary to Govt of Khyber Pakhtunkhwa for Local Govt & Rural Development Department, Peshawar.
- 2. Director General Local Govt: & Rural Development KP, Peshawar.
- Assistant Director, Local Govt & Rural Development Department Karak, District Karak.
- 4. Musam Khan, Assistant Director, Local Govt & Rural Development Department, Lakki Marwat, Member DPC.
- 5. Shakeel Ahmad, Assistant Engineer, Local Govt: & Rural Development Karak, Member DPC. Presently office of AD, LG & RDD Lakki Marwat.
- 6. Mir Daraz, Secretary Village Council Tarki Khel, Tehsil & District Karak.
- 7. Naik Nawaz, Secretary VC Jahangiri, Tehsil Takhti Nasrati, District Karak.
- 8. Sartaj Khan, Secretary VC Takhti Nasrati, Tehsil Takhti Nasrati, District Karak.
- 9. Nisarullah, Secretary VC Mardan Khel, Tehsil B.D Shah, District Karak.

Regischar

(Respondents)

APPEAL UNDER SECTION -4 OF K.P

SERVICE TRIBUNAL ACT 1974 AGAINST

THE IMPUGNED INCORRECT, ILLEGAL,
INVALID, UNFAIR AND AGAINST RULES,
REGULATION AND AGAINST

PROMOTION POLICY ORDER NO:
691/A-D L.G.KK DATED 18/02/2020

WHEREBY RESPONDENTS NO: 6 TO 9

HAVE ILLEGALLY, UNLAWFULLY AND UNCONSTITUTIONALLY AND AGAINST GOVENRMENT POLICY BEEN PROMOTED FROM CLASS IV TO THE POST OF VILLAGE COUNCIL SECRETARIES AND APPELLANT HAS ILLEGALLY AND MALAFIDELY BEEN DEPRIVED OF HIS DUE RIGHT OF PROMOTION.

RESPECTFULLY SHEWETH:

The appellant submit as under:-

- 1. That appellant was appointed as Class-IV i.e. Chowkidar in the office of AD, LG & RDD Karak and since then, performing his duties to best of his efficiency. (Copy of appointment order is annexed as annexure "A").
- 2. That the appellant has academic qualification of F.A and professional & technical qualification of Diploma in Information Technology. (Copies of Academic Qualification etc are annexed as annexure "B, C & D" respectively).
- 3. That respondent department issued Notification regarding amendment in appointment & promotion policy vide Notification No: SO(LG-I) 2-188 SSRC/2018/981 dated 5th April 2018 which has been further amended by another Notification No: SO(E) L.G/2-188/SSRC/2019

dated 16th Oct 2019. (Copies of both notifications are annexed as Annexure "E & F" respectively).

- 4. That as per latest and final notification i.e annexure "E" of the appeal clause (F) (I) it has been laid down that 20% promotion to the post of Village Secretary will be made from amongst the Naib Qasid & Chowkidar in village council / neighborhood council with Seniority at Tehsil Level having (Matric) SSC in 2nd division from recognized board and six months diploma in I.T from recognized board with 3 years service/ experience.
- 5. That as per these notifications, the appellant is fully qualified and eligible for promotion to the post of secretary VC.
- 6. That respondent No:3 being well aware of these facts deprived appellant from his due right of promotion and malafidely promoted private respondents 6 to 9 by incorrect, invalid, unfair and against seniority rules, framed a unique type seniority list which is against the principle and precedent of seniority preparation through impugned order No: 691/A.D, LG KK dated 18/02/2020. (Copy of impugned promotion order dated 18/02/2020 annexed as annexure "G")
- 7. That the respondent No:3 kept the impugned orders very secret from appellant because the

appellant had already raised objection regarding the incorrect and invalid Seniority List. (Copies of Seniority List & Objection Petition is annexed as annexure "H & I" respectively).

- 8. That after receiving knowledge of the impugned order dated 18/02/2020, the appellant submitted departmental appeal / representation before the appellate authority i.e, respondent No: 2 on 16/03/2020. (Copy of Representation is annexed as annexure "J")
- 9. That now the statutory period of ninety (90) days has been lapsed, however, respondent No:2 has not responded fate of departmental representation of the appellant nor any information has been communicated to the appellant. So the same may kindly be considered as final order.
- other adequate remedy except to approach this
 Hon'ble Tribunal for provision of justice, hence
 the instant service appeal is filed on the
 following grounds inter-alia:-

GROUNDS:

A. The impugned promotion order No: 691/A.D, L.G KK issued by the office of respondent No:3 is illegal, void ab-initio and against the impugned order issued by respondent No:3 is against the Tehsil level Seniority Policy of the Govt/ Department.

- B. That the impugned promotion order has been issued on the basis of wrong, incorrect and policy prepared seniority list, against which the appellant submitted objection through appeal.
- C. That respondent No:3 has misguided the DPC and out of total 12 posts reserved for Promotion Quota amongst Naib Qasids and Chowkidars only four (4) favorite employees have been promoted despite that six (6) were available, that is evident from minutes of the meeting of D.P.C on dated 17/02/2020. (Copy of meeting is attached as annexure "K")
- D. That in case of availability of fully eligible candidate including in seniority list promoting only 4 candidates and keeping 2 posts vacant is clear precedent of nepotism and favoritism and is example of pick & chose policy and personal like and dislike.
- E. That despite of clear cut policy of Tehsil level importing of candidate from another Tehsil and appointing him in foreign Tehsil is violation of Govt Notification i.e. Annexure "E" and policy of the Department.
- F. That promotion of ineligible employee is against rules and policy and notification of the Provincial Government.
- G. That the impugned disputed seniority list and subsequent impugned promotion order both are against the established norms and principles of rules and justice and both are not

sustainable in the eyes of law, rules and statutes.

H. That any other grounds if felt necessary will be agitated during arguments.

It is, therefore, very humbly prayed that on acceptance of the instant service appeal, the impugned promotion order NO: 691/A.D, L.G, KK dated 18/02/2020 issued by respondent No:3 as well as the impugned incorrect and against policy framed seniority list prepared respondent No<u>3</u> may very graciously declared against the law, rule and Governmental and departmental policy and kindly be declared as ineffective and void ab-initio and respondent No:3 may kindly be directed all 12 posts of VC Secretary reserved under 20 % Ouota accordance with Government Policy considering the appellant and candidates in light of the Government Policy.

Dated: 13/07/2020

Mansoor Islam Chowkidar, Office of the Assistant Director Local Govt: & Rural Development Department

Karak

Through

Abdul Nasir Khattak Advocate, D.B.A Karak Cell No: 0346-9777867

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Mansoor Islam VERSUS

Secretary Govt: of KPK & Others

AFFIDAVIT

I, Mansoor Islam S/o Islam Badshah, Chowkidar, Office of Assistant Director, Local Government & Rural Development Department KPK, do hereby solemnly affirm and declare that all the contents of the accompanied appeal is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

DEPONENT

CNIC: 14202-7242908-5

CELL NO: 033/980/482

Identified By:

Abdul Nasir Khattak Advocate, D.B.A Karak Administration of the commission country of the country of the commiss

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Mansoor Islam

VERSUS

Secretary Govt: of KPK & Others

ADDRESSES OF PARTIES

APPELLANT.

Mansoor Islam S/o Islam Badshah, Chowkidar, Office of Assistant Director, Local Government & Rural Development Department KPK

RESPONDENTS:

- 1. Secretary to Govt of Khyber Pakhtunkhwa for Local Govt & Rural Development Department, Peshawar.
- 2. Director General Local Govt: & Rural Development KP, Peshawar.
- 3. Assistant Director, Local Govt & Rural Development Department Karak, District Karak.
- 4. Musam Khan, Assistant Director, Local Govt & Rural Development Department, Lakki Marwat, Member DPC.
- 5. Shakeel Ahmad, Assistant Engineer, Local Govt: & Rural Development Karak, Member DPC. Presently office of AD, LG & RDD Lakki Marwat.
- 6. Mir Daraz, Secretary Village Council Tarki Khel, Tehsil & District Karak.
- 7. Naik Nawaz, Secretary VC Jahangiri, Tehsil Takhti Nasrati, District Karak.
- 8. Sartaj Khan, Secretary VC Takhti Nasrati, Tehsil Takhti Nasrati, District Karak.

9. Nisarullah, Secretary VC Mardan Khel, Tehsil B.D Shah, District Karak.

Dated: 13/07/2020

Appellant

Through

Abdul Nasir-Khattak Advocate, D.B.A Karak Cell No: 0346-9777867

OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVT & RURAL DEVELOPMENT DEPTT: DISTRICT KARAK

No: 18 LG & RD Karak
Dated: 3///2/20/2

OFFICE ORDER

On the Recommendation of Departmental Selection Committee District Karak
Mr Manoor Islam s/o Islam Badshah R/o District Karak is herby appointed as post of
Chowkidar BPS-01 in the against vacant post W.e. from 31/12/2012 in the office of Assistant
Director local Govt and RDD Karak under the following terms and conditions

1. You will be on probation of one year and your service can be terminated without any notice or assigning any reason, after completion of probation period your service can be terminated on one month notice or pay in lieu thereof on either side provided that such termination is not due misconduct for which you will be terminated without any notice.

You shall have to produce a medical fitness certificate from board of medical officer or medical superintend of District Hospital Karak.

Assistant Director Local Govt & RDD District Karak

No ADLG

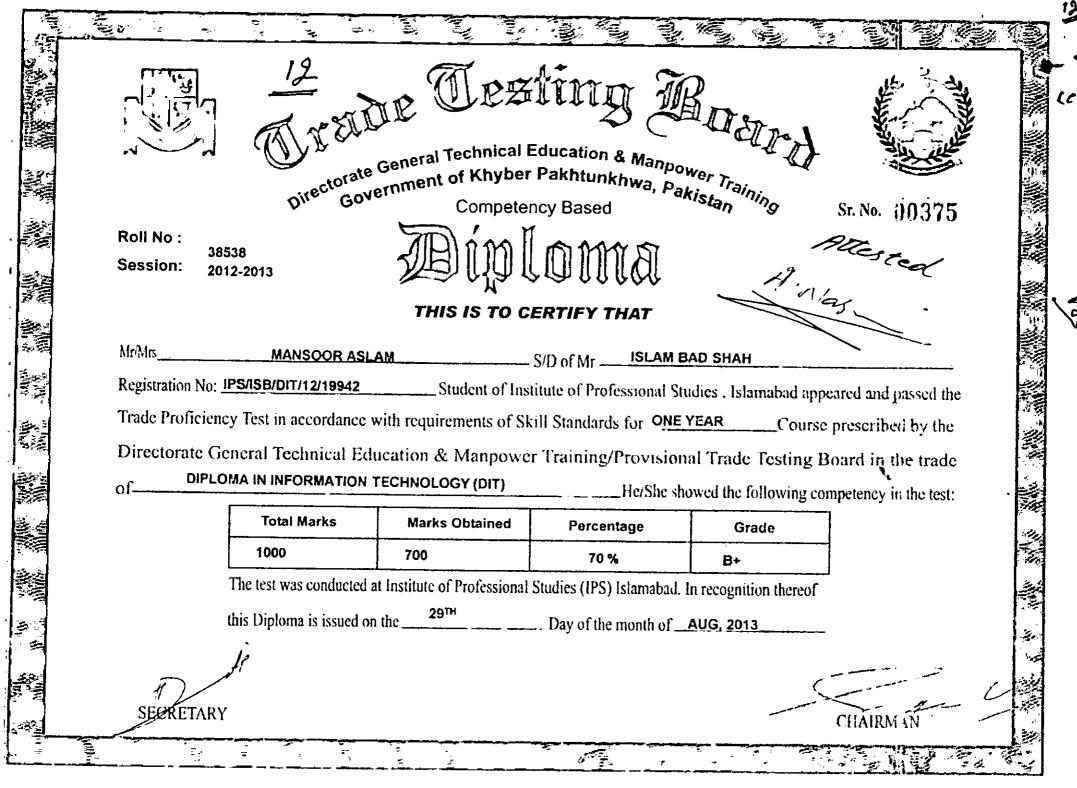
Dated:_____

Copy to:

- 1. The Director General Local Govt RDD KPK Peshawar
- 2. The Director Local Govt & RDD KPK Peshawar.
- 3. The SO (Est.) Local Govt & RDD KPK Peshawar.
- 4. The District Account Officer District Karak
- 5. Official Concerned

Assistant Director Local Govt & RDD District Karak

Mas Teal S. No: 044872 -Annexure "(), Roll No. <u>63578</u> Brard Of Intermediate and Secondary Education Kulat Chyber Pakhtunkhwa, Pakistan. HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION **GROUP: HUMANITIES SESSION: 2012 ANNUAL** Ghis is to Certify that _____ MANSOOR ISLAM ____ Son / Daughter of Mr. ____ ISLAM BAD SHAH and a student of ______ DISTRICT KARAK having Registered No. 7810-PVT/KHT-2011 has passed the Intermediate Examination of the Board of Intermediate and Secondary Education, Rohat held in MAY, 2012 as a PRIVATE candidate. Re / She obtained 495 Marks out of 1100 and has been placed in D Grade, Representing





Government Of Khyber Pakhtunkhwa Local Government, Elections & Rural Development Department

NOTIFICATION

Dated Peshawar, the 05th April, 2018

No. SO(LG-1)2-188/SSRC/2018.- \(\sigma \) In exercise of the power conferred by sub-rule (2) of the rule 3 of the Khyber Pakhtunkwha Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Local Government, Elections and Rural Development Department Khyber Pakhtunkhwa, in consultation with the Establishment & Administration Department and the Finance Department, is hereby directs that in this Department's Notification No. \(\sigma \)G(RWP)7(2)/73; dated 26.01.1978, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix.

for serial No. 10 the following shall be substituted, in the respective columns, namely:

		• • • •		-3535	Chamber Tice (75) per cent by
Γ	*10 Su	jervisor-	Atleast Second Class	.21 (0.30]	Seventy-five (75) per cent by promotion, on the basis of
1			Bachelor's Degree from a	yearst	promotion. on the same
1			recognized University.		Selilotti A-Conti-trancas.
			7		amongst the Senior Secretary
		;			Village & Neighborhood Council.
1					with atleast five (05) year service
. !					as such; and
					ii) Twenty-five (25) per cent by
		:			initial recruitment:
٠.		,		.!	La constantina de la constantina della constanti

(b) after serial No. 15, the following new entries shall be inserted, in the respectively columns, namely.

	THERE IS .			
			Í	By promotion, on the basis of seniority-
1		Senior		eum-fitness, from amongst the Junior
Ì		Secretary		Secretary Village / Neighborhood
١		Village /		Council, with atleast ten (10) year
		Neighborhood		service as such and
,		Council		

(c) for serial No. 16, the following shall be substituted, in the respective columns, namely:

	وكسند دروه		Character Class	18 10	i) Twenty (20) per cent by
: - 1	:16.		Atleast Second. Class		promotion, on the basis of
	10	Secretary .	Intermediate 0	<u> </u>	
			equivalent qualification	years.	1 Semente contraction
!		-	equivarent quantity	4 1	amongst the Naib Qasids and
		Neighborhood	from a recognized Board		Chowkidars in the Village //
		Council.	and atleast six (96)	CHONKIDAIS AN COLOR WILLIAM
				n i	Neighborhood Council with
. " .		,	•	a	seniority at tehsil level, having
			L Comparer com	- 1	Secondary School Certificate in
	/		recognized Institute wit	h i	
	1 %		experiencé in MS		second division, from a
, ,	¢. y	11.	i i i		recognized Board or Institute
	المراث أ	I will a	Office. Impage ar		with three (03) year service as
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13	1. //	12/1/			such: and
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Mested

ii) Eighty (80) per cent by initial recruitment:

Provided that the candidate shall be preferably a bonafide resident of the same Village. Neighborhood (Council, II such candidate is not available in the same Village.) Neighborhood Council then the candidates, from adjacent Village. Neighborhood Council:

Provided further that in case of non-availability of candidate from adjacent Village Neighborhood Council then from any other Village.

Neighborhood Council in that Tehsil Council.

SECRETARY TO GOVERNMENT OF KP LOCAL GOVT, ELECTIONS & RURAL DEVELOPMENT DEPARTMENT

Dated Peshawar, the 05th April, 2018

No. SO(LG-I)2-188/SSRC/2018.-

Copy Torwarded to:-

- 1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa.
- 2. All Divisional Commissioners in Khyber Pakhtunkhwa.
- 3. The Secretary to Governor, Khyber Pakhtunkhwa, Peshawar,
- 4. The PSO to Chief Minister, Khyber Pakhtunkhwa Peshawar,
- 5. The PSO to Chief Secretary, Khyber Pakhtunkhwa Peshawar.
- 6. The Director General, LG, E&RDD, Khyber Pakhtunkhwa Peshawar,
- 7. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar,
- 8. All Head of Attached Departments in Khyber Pakhtunkhwa.
- 97 All Deputy Commissioners in Khyber Pakhtukhwa.
- 10. The Registrar, Peshawar High Court: Peshawar,
- 11. All District and Session Judges in Khyber Pakhtunkhwa.
- 12. All Assistant Directors, LG&RDD in Khyber Pakhtunkhwa.
- 13 The Manager Government printing press. Peshawar for publication in the next Government Gazettee Notification. 40 copies of the Notification may be sent to this Department.
- 14. The PS to Senior Minister for LG.E&RD Khyber Pakhtunkhwa.
- 15. The PS to Secretary LG.E&RDD Peshawar.
- 16, The Office Order lile.

(CAMINAHUM NAH)

SECTION OFFICER (ESTAB)

Phone # 091_0213224

Annexure & E 3 13

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Government of Khyber Pakhtunkhwa Local Government, Elections & Rural Development Department

NOTIFICATION

Dated: Peshawar, the 05th April, 2018

No.SO(LG-I)2-188/SSRC/2018-981 in exercise of the power conferred by sub-rule (2) of the rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the Local Government, Elections and Rural Development Department Khyber Pakhtunkhwa in consultation with the Establishment & Administration Department and the Finance Department is hereby directs that in the Department's Notification No DG(RWP)7(2)/73, dated 26.01.1978, the following further amendments shall be made, namely

AMENDMENTS

In the Appendix:-

I for serial No. 10 the following shall be submitted in the respective columns, namely.

	· · · · · · · · · · · · · · · · · · ·	0	P-0-0-11	o colonius, namely.
. "10.	Supervisor	Atleast Second Class Bachelor's Degree from a recognized University	21 to 30 years	i)Seventy-five (75) percent by promotion, on the basis of seniority-cum-fitness. From amongst the Senior Secretary Village/ Neighborhood
				Council. With atleast five (05) year service as sVCh: and ii) Twenty-five (25) percent by initial recruitment.

(b) after serial No. 15 the following new entries shall be inserted. In the respectively columns namely

"15A	Senior Secretary Village			Die manation and the
120		•••••	*********	By promotion, on the
	Neighborhood Council			basis of seniority-cum-
				fitness from amongst the
				Junior Secretary Village/
				Neighborhood Council,
				with atleast ten (10)
				year service as sVCh:
L				and

(c) for serial No. 16. The following shall be substituted in the respective columns, namely

11 4 0		T		
"16	Junior	Atleast Second	18 to 30 years	1) Twenty (20) percent
	Secretary	Class Intermediate		by promotion on the
	Village	or equivalent		basis of seniority-
	Neighborhood	qualification from		cum-fitness from
-	Council	a recognized board		amongst the Naib
		and atleast six (06)		Qasids and
	ν.	months Certificate		Chowkidars in the
		in Computer from a		Village/
		recognized	•	Neighborhood Council
		Institute with		
		experience in MS		with seniority at
				tehsil level, having
)		Office, Inpage and	•	Secondary School
		Internet.		Certificate in second
		•		division from a
				recognized Board or
				Institute with three
				(03) year service as
	<u> </u>			sVCh: and

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ii) Eighty (80) per cent by initial recruitment:
Provided that the candidate shall be preferably a bonafide resident of the same Village Neighborhood Council. If sVCh candidate is not available in the same Village, Neighborhood Council then the candidates from adjacent Village
Neighborhood Council; Provided further that in case of non- availability of candidate from adjacent Village Neighborhood Council then from any other Village Neighborhood

SECRETARY TO GOVERNMENT OF KP LOCAL GOVT ELECTIONS & RURAL DEVELOPMENT DEPARTMENT

Council.

Council in that Tehsil

No. SO(LG-I)2-188/SSRC/2018.

Dated Peshawar, the 05th April, 2018

Copy forwarded to:-

- 1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa.
- 2. All Divisional Commissioners in Khyber Pakhtunkhwa.
- 3. The Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
- 4. The PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
- 5. The PSO to Chief Secretary, Khyber Pakhtunkhwa Peshawar.
- 6. The Director General, LG. E&RDD. Khyber Pakhtunkhwa Peshawar.
- 7. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 8. All Head of Attached Departments in Khyber Pakhtunkhwa.
- 9. All Deputy Commissioners to Khyber Pakhtunkhwa.
- 10. The Registrar Peshawar High Court, Peshawar.
- 11. All District and Session Judges in Khyber Pakhtunkhwa.
- 12. All Assistant Directors, LG & RDD in Khyber Pakhtunkhwa.
- 13. The Manager Government Printing Press, Peshawar for publication in the next Government Gazette Notification. 40 copies of the Notification may be sent to this Department.
- 14. The PS to Senior Minister for LG, E&RDD Khyber Pakhtunkhwa.
- 15. The PS to Secretary LG. E &RDD, Peshawar.
- 16. The Office Order file.

(HAJI MUHAMMAD) SECTION OFFICER (ESTAB) Phone # 091-9313331



Government Of Khyber Pakhtunkhwa Local Government, Elections & Rural Development Department

NOTIFICATION

Dated Peshawar, the 16th October, 2019

No. SO(E)LG/2-188/SSRC/2019.-

In exercise of the powers conferred by sub-rule (2)

of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Local Government, Elections and Rural Development Department Khyber Pakhtunkhwa, in consultation with the Establishment & Administration Department and the Finance Department hereby directs that in this Department's Notification No. DG(RWP)7(2)/73, dated 26.01.1978, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

- a) Against Serial No. 2, in column No. 6, for the existing entries, the following shall be substituted, namely:
 - i) "Fifty per cent by initial recruitment through Khyber Pakhtunkhwa Public Services Commission on the pattern of syllabus prescribed for the Officers in Provincial Management Service.";
 - ii) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Progress Officers with at least three years service as such; and
 - iii) Ten percent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Scale Stenographers and Assistants with at least three years service as such.";

Note: For purpose of promotion to the post of Assistant Director against ten percent quota, there shall be maintained a joint seniority list of Senior Scale Stenographers and Assistants.";

- b) against Serial No. 3, in column No.6, for the existing entries, the following shall be substituted, namely:
 - i) "Fifty (50) per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Superintendents with at least three years service as such; and
 - ii) Fifty (50) per cent by initial recruitment.";
- c) against Serial No.5, in column No. 6, for the existing entries, the following shall be substituted, namely:
 - i) "Twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst diploma holder Sub-Engineers with at least ten years service as such and have passed the prescribed Departmental Examination;
 - ii) Ten per cent by promotion, on the basis of seniority-cum-fitness, from amongst Sub-Engineers with at least five years service as such and who possess

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d) against Serial No. 6, in column No.6, .for the words, colon and slash "Assistants/Accountants/Senior Scale Stenographer", the word "Accountants" shall be substituted;

e) against Serial No. 15A, in column No.6, for the word, figure and brackets "ten (10)", the word, figure and brackets "five (05)" shall be substituted; and

f) against Serial No. 16, in column No.6 for the existing entry, the following shall be substituted, namely:

i) Twenty (20) per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids and Chowkidars in the Village Council / Neighborhood Council with seniority at Tehsil level, having Secondary School Certificate in Second Division from a recognized Board or Institute and six months Diploma in IT from recognized Board / Institute with three (03) years service as such; and

ii) Eighty (80) per cent by initial recruitment:

Provided that the candidate shall be preferably a bonafide resident of the same Village / Neighborhood Council. If such candidate is not available in the same Village Council / Neighborhood Council then the candidate from adjacent Village Council / Neighborhood Council;

Provided further that in case of non-availability of candidate from adjacent Village Council / Neighborhood Council then from any other Village Council / Neighborhood Council in that Tehsil.".

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA LG,E&RD DEPARTMENT

No. SO(E)LG/2-188/SSRC/2019.-

Dated Peshawar, the 16th October, 2019

Copy forwarded to:-

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa.

2. All Divisional Commissioners in Khyber Pakhtunkhwa.

3. The Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.

4. The PSO to Chief Minister, Khyber Pakhtunkhwa Peshawar.

5. The PSO to Chief Secretary, Khyber Pakhtunkhwa Peshawar.

6. The Director General, LG, E&RDD, Khyber Pakhtunkhwa Peshawar.

7. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.

8. All Head of Attached Departments in Khyber Pakhtunkhwa.

9. All Deputy Commissioners in Khyber Pakhtunkhwa.

10. The Registrar, Peshawar High Court, Peshawar.

11. All District and Session Judges in Khyber Pakhtunkhwa.

12. All Assistant Directors, LG&RDD in Khyber Pakhtunkhwa.

13. The Manager Government printing press, Peshawar for publication in the next Government Gazettee Notification. 100 copies of the Notification may be sent to this Department.

14. The PS to Senior Minister for LG, E&RD Khyber Pakhtunkhwa.

15. The PS to Secretary LG, E&RDD Peshawar.

16. The Office Order file.

(HAJI MUHAMMAD) SECTION OFFICER (ESTAB)

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On the recommendation of the Determination of the D

Since Name of Case of

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5.No Name of Cass-IV Name Promoted to the post of VC/NCs Secretaries VC/NCs

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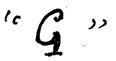
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OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURÂL DEVELOPMENT DEPARTMENT DISTRICT KARAK

No.691/ ADLGKK

Dated Karak the! 18/02/2020

OFFICE ORDER

On the recommendation of the Departmental Promotion Committee, the following Class-IVs are hereby promoted as <u>Secretaries VC/NCs (BPS-9)</u> on regular basis office of the Assistant Director LG & RDD Karak with immediate effect. They will be on probation for peried of one year which may be extanded.

S. No	Name of Class-IV	 i
1	Mir Daraz	ı
2	Nak Nawaz	
3 -	Sartaj Khan	 I !
4	Nisar Ullah	

Constequent upon their promotion, they are adjusted against the vacant posts.

Being the resident of the same are adjasent and tehsil, level in the following VC/NCs.

S. No	Name of Class-IV promoted to the post of Secrearies VC/NCs	Name of VC/NCs	Tehsil
1	Mir Daraz	Tarki Khel	Karak
2	Nak Nawaz	Jahangiri	Takhti Nasrati
3	Sartaj Khan	Takhti Nasrati Paya	Takhti Nasrati
4	Nisar Ullah	Mardan Khel	B D Shah

Assistant Director LG & RDD Karak

Cc:

- 1. The Director General LG & RDD Khyber Pakhtunkhwa, Peshawar.
- 2. Registrar Peshawar High Court Bannu Bench.
- 3. Section Officer Establishment LG & RDD Khyber Pakhtunkhwa, Peshawar.
- 4. PS to Secretary LG & RDD Khyber Pakhtunkhwa, Peshawar.
- 5. Deputy Commissioner Karak.
- 6. The District Accounts Officer Karak.
- 7. Office Assistant LG & RDD Karak.
- 8. Supervisor LG & RDD Karak.
- 9. Official Concerned.

Assistant Director LG & RDD Karak

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FUNAL	LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT ANI
	RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

5,No		•	Dated,/20
	· · · · · · · · · · · · · · · · · · ·	 	

Tehsil Karak

S,No	Name	Designation	Date of Appointment	Date of Birth	Qualification
1 .	Mir Daraz	Naib Qasid	01-07-1991	12-11-1968	Metric
	Hazrat Ali	Naib Qasid	02-05-1993	09-01-1967	Metric ·
3	Muhammad Ijaz	Naib Qasid	01-01-1996	01-02-1974	Metric
4	Naseer Iqbal	Naib Qasid	02-02-2005	02-02-1978	Metric
. 5	Noor ul Basar	Naib Qasid	02-06-2008	10-03-1993	7 th
6 .	Mansoor Islam	Chawkidar	31-12-2012 .	17-07-1989	F,A
7	Umer Karim	Naib Qasid	14-01-2013	01-04-1990	Metric
8	Rashid Nawaz	Najb Qasid	30-04-2013	05-02-1990	Metric
9	Ikram Ullah	Naib Qasid	10-09-2013	01-04-1987	Metric
10	Adnan hussain -	Naib Qasid	30-09-2015	20-08-1988	Metric
11	Arshad Zaman	Naib Qasid	30-09-2015	27-01-1991	F,A
12	Abid Rasool	Naib Qasid	30-09-2015	10-04-1991	D,Com/ B,Com/Computer,TTB
13	Junaid Rehman	Naib Qasid	30-09-2015	06-05-1994	F,A -
14	Zeeshan Wajeed	Naib Qasid	· 30-09-2015	01-01-1994	FSc
15	Saqib Junaid	Naib Qasid	30-09-2015	30-04-1996	FSc
16	Asif Rasool	Naib Qasid	30-09-2015	21-09-1979	Metric
1.7	Amin Ullah	Naib Qasid	30-09-2015	20-02-1980	Metric
18	Wasim Hayat	Naib Qasid	30-09-2015	01-03-1984	Metric
19	Hakmat Ullah	Naib Qasid	30-09-2015	10-04-1986	Metric
20	Abid Ullah	Naib Qasid	30-09-2015	08-02-1988	Metric
21	Tahir ul Haq	Naib Qasid	30-09-2015	02-04-1987	Metric
· 22	Rifaq Ullah	Naib Qasid	30-09-2015	19-02-1990	Metric
23	Asif Iqbal	Naib Qasid	30-09-2015	28-02-1990	Metric
24	Wahid Ullah	Naib Qasid	30-09-2015	25-03-1991	Metric
25	Qasid Iqbal	Naib Qasid	30-09-2015	10-04-1991	Metric
26	Sajid Ullah	Naib Qasid	30-09-2015	08-02-1992	Metric -
27	Rehmat Ali	Naib Qasid	30-09-2015	29-11-1992	Metric 3

Muhammad Mussadiq	Naib Qasid	30-09-2015		
Zain Ullah		30-09-2015	04-04-1993	B.A
Mati Ullah	Naib Qasid	30-09-2015	05-04-1994	
	Naib Qasid	30-09-2015	10-12-1994	Metric
Zakir Ullah	Naib Qasid	30-09-2015		Metric
Lal Zaman	Naib Qasid		02-04-1995	F.A
Muhammad Shoukat		30-09-2015	01-01-1977	Blot-i-
	Naib Qasid	12-09-2017		
Muhammad Shoukat	Naib Qasid	30-09-2015 12-09-2017	01-01-1977 05-04-1988	Metric B,A

Assistant Director LG&RDD Karak

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FINAL LIST OF NAIB QAŞID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL. DEVELOPMENT DEPARTMENT DISTRICT KARAK

TEHSIL TAKHATI NASRATI

1	Nak Nawaz	Naib Qasid	06-10-1988	30-03-1969	Metric	
2	Sadiq Rehman	Naib Qasid	15-05-1995	01-01-1970	Metric	
3	Sartaj Khan	Naib Qasid	03-07-1995	04-12-1969	Metric	- 1
4	Irfan Ullah	Naib Qasid	15-01-2013 .	10-02-1979	Metric	
5	Nasir Iqbal	Naib Qasid	30-09-2015	14-03-1978	Metric	
6	Abid Muhammad	. Naib Qasid .	30-09-2015	09-05-1981	F,A	
7	Muhammad Shoaib	. Naib Qasid -	30-09-2015	01-10-1988	M,A	
8	Muhammad Imran	Naib Qasid	30-09-2015	11-02-1986	FSc	··
9	Abdul Wahab	Naib Qasid	30-09-2015	25-04-1984 -	Metric	
10.	Wali Rehman	Naib Qasid ·	30-09-2015	01-08-1969	Metric	
11	Zulfigar	Naib Qasid	30-09-2015	01-01-1975	Metric	
12	Muhammad Faroog	Naib Qasid	30-09-2015	01-12-1975	Metric	
13	Fazal Dad	Naib Qasid	30-09-2015	01-01-1978	Metric	
.14	Muhammad Hilal	Naib Qasid	30-09-2015	01-03-1984	Metric	
15	Faid ur rehman -	Naib Qasid	30-09-2015	02-04-1985	Metric ·	
16	Muhammad Parviz Aslam	Naib Qasid	30-09-2015	25-05-1986	Metric	
17	Wahab ud Din	Naib Qasid	30-09-2015	02-06-1977	Metric	
18	Qaisar Iqbal	Naib Qasid	30-09-2015	19-10-1983	Metric	
19	Arif Mahmood	Naib Qasid	30-09-2015	01-03-1991	Metric	
20	Muhammad Hamayun	Naib Qasid	30-09-2015	30-01-1992	Metric	
21	Izhaar Ullah	Naib Qasid	17-09-2017	08-04-1996	Metric	
22	Irfan Ullah	Naib Qasid	18-09-2017	20-04-1987	FSc	

Assistant Director

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-	FINAL LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK	
Ļ	S,No	
	Dated,/	/20

Amir Badshah		TEHSIL BANDA DAUD SHAH		
Nek Daraz Shakir Ullah Nisar Ullah Umer Ghani Muhammad Israr Tariq Rehman Bilal Ahmad	Naib Qasid	23-11-1982 26-07-1992 10-01-2013 21-12-2013 31-10-2014 30-09-2015 30-09-2015 30-09-2015	01-01-1961 01-07-1961 01-02-1985 12-08-1989 05-05-1984 15-06-1981 08-08-1981 05-01-1997	Nil Nil Metric Metric 8th Metric F,A Metric

Assistant Director LG&RDD Karak

Annex ((4"(1)

To,

Assistant Director L.G & R.D.D Karak Dairy No-250 Dated - 20-03-2020 AD LGE RDD KK

Subject:

OBJECTION ON IN-CORRECT AND IMPROPER AND WRONG SENIORITY LIST OF NAIB QASID AND CHOWKIDAR REGARDING TEHSIL KARAK, B.D SHAH AND TAKHT-E- NASRATI.

Respected Sir,

With due regards it is submitted that your respectable office has issued a unique strange and astonishing final seniority list of Naib Qasid & Chowkidar which does not bear no office number and no date of issuance. It is also worth mentioning that prior to final seniority list no tentative seniority list has been circulated nor issued.

This unique seniority list does not show place of posting of officials, place of initial appointment of officials has been described in the list. It is also pertinent to mention here that seniority list has no detail of present place/station of duty of

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officials such like VC's/NC's and office of deployment etc.

No detail of academic qualification such as marks/Division year of passing name of Board and professional qualification of I.T Diploma year session is evident from the seniority list.

Moreover this in-correct and illegal seniority list does not reveal that any tentative seniority list has ever been issued or circulated before Final seniority list.

It is also strange to mention here that total section posts of Naib Qasid & Chowkidar in Tehsil Karak are 29 whereas the seniority list shows it 33. Which is against the logic. Similarly total sanctioned posts in Tehsil B.D Shah are 14 whereas the seniority list of B.D shah shows it 8.

This facts clearly reveals that there is something wrong in the Bottamn.

So it is humbly stated that this in correct, wrong and bogus and fake Final seniority list

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regarding Naib Qasid & Chowkidar may kindly be with drawn and correct, proper and actual seniority list may please be prepared after proper scrutiny after circulation of tentative seniority as per rules and procedure.

Thanks

Your Obedent servant

(MANSOOR ISLAM)
Chowkidar office of the
AD LG & RDD Karak

Date: <u>19-02-2020</u>

Copy to the:-

1: Chief Secretary Khyber Pakhtunkhwa Peshawar.

2. Secretary LG & RDD Khyber Pakhtunkhwa Peshawar

964-3. Director General LG & RDD Khyber Pakhtunkhwa 1901-20 Peshawar

4. Section Officer (Establishment) LG & RDD Khyber Pakhtunkhwa.

(MANSOOR ISLAM)
Chowkidar office of the
AD LG & RDD Karak

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Annexure a J" 25

واجبالاحترام بحضور جناب ڈائر یکٹر جنرل صاحب محکمہ بلدیات ودیہی ترقی خیبر پختونخوالیثادی محکماندائیل:۔

عنوان: ای<u>ل برخلاف ترقی درجه چهارم ملازمین برعهده ورای کوسل سیرٹری بروئے هم اسسنن دائر یکٹر محکمہ</u> بلدیات ودیمی ترقی ضلع کرک

جناب عالى!

نہایت مود باندگذارش ہے کہ اسٹنٹ ڈائر یکٹر بلدیات ودیجی تی ضلع کرک نے بغیر کسی TENTATIVE بینارٹی کسٹ کو مرتب کر کے بغیر مشتہر کئے نفید طور پر فائنل سنیارٹی کسٹ مرتب کیااور چند کن پسنداور منظور نظر درجہ چہارم ملاز مین سے برعہدہ ویلی کونسل سیرٹری کے عہدوں پر غیر قانونی، غیرا خلاقی خلاف قواعد وضوابط اور خلاف سنیارٹی رولز وخلاف پروموش پالیسی ترقی کا حکم نامہ جاری کیا ہے جو کہ مروجہ قانون، ضابط اور خلاف پروموش پالیسی اور خلاف انصاف وخلاف بنیادی حقوق پر بٹنی ہے، لہذا با منظوری محکمانہ اپیل سائل کے اسٹینٹ ڈائر کیٹر بلدیات و دیجی ترقی ضلع کرک کے غیر قانونی اور خلاف تواعد وضوابط و خلاف پروموش پالیسی احکامات ترقی درجہ چہارم ملاز مین برعہدہ ویلے کونسل سیرٹری کومنسوخ فر ماکر اسٹینٹ ڈائر کیٹر بلدیات و دیجی ترقی ضلع کرک اور ڈسٹرکٹ اکا وَنش کے میسرکرک کو خدکورہ بالا احکامات کے تحت تخوا ہوں کی ادائیگی کرنے سے منع کر کے تا پھیل انکوائری ہرتیم کی ادائیگی سے روک دینے کا حکم صادر فر مایا جائے ۔ سائل غذکورہ بالا احکامات کے تو ایک دیا تنظر کرک کوعدالت میں چیلنج کرنے کا حکم صادر فر مایا جائے ۔ سائل غذکورہ بالا احکامات اسٹینٹ ڈائر کیٹر بلدیات و دیجی ترفی اسٹی خوادر میں تو تی صفح فر طارکتا ہے۔ شکر بالدیات و دیجی ترفی اسٹیٹ ڈائر کیٹر بلدیات و دیجی ترفی اندی میں ترفی سناس افسر کے ذریعے انکوائری کرنے کا حکم صادر فر مایا جائے ۔ سائل غذکورہ بالا میان بلدیات و دیجی ترفی سناس افسر کے ذریعے انکوائری کرنے کا حتی بھی محفوظ رکھتا ہے۔ شکر بی

العارض

16-03-2020 - خورفرند

منصوراسلام چوكيداردفتر اسشنث ڈائر يكٹر بلديات وديبي ترقی ضلع كرك

کا پی برائے اطلاع وضروری کاروائی:۔

- ۔ چیف سیرٹری خیبر پختو نخو ایشاور
- ۲ سیرٹری محکمہ بلدیات ودیہی ترقی خیبر پختونخواپشاور
- سر سیشن آفیسر اسلیلیشمند محکمه بلدیات و دیبی ترقی خیبر بختونخو آپشاور
 - ه. ڈائر یکٹرانٹی کرپشن خیبر پختونخواپشاور
 - ۵۔ ڈپٹی کمشنر کرک

Annexure



OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website: www.lglsp.gto.ph I-mail address: adkarak #gmail.com Phone Number: 0927-291204

No. 090 JADLGKK

Dated Karak the, 17/2/2020

MINUTES OF THE DEPARMENTAL PROMOTION COMMITTEE MEETING HELD ON 17/02/2020 UNDER THE CHAIRMANSHIP OF ASSISTANT DIRECTOR LOCAL GOVERNAMNET AND RURAL DEVELOPMENT DEPARTMENT KARAK

A meeting of the departmental promotion committee was held on 17th February 2020, on the chairmanship of Assistant Director LG & RDD Karak to examine the suitability eligible Class-IVs for promotion to the posts of Secretaries VC/NCs. The following attended the meeting:

1. Mr Muhammad Naeem Khan Kundi

Assistant Director LG & RDD Karak

Chairman

2. Musam Khan Kundi

Assistant Director LG & RDD Lakki Macwat

Membaer

3. Mr. Shakeel Ahmad___

Assistant Engineer LG & RDDKarak

Membaer

The meeting started with recitation from Holy Qur'an. The Chairman welcomed the participants and highlighted the purpose. The Committee was informed that six posts of Secretaries. VC/NCs are lying vacant and according to the policy / instruction of the Govt. the same is required to be filled in through promotion amongst the Class-IVs of the VC/NCs.

As per Service rules notified by the Gövt: vide Notification No. <u>SO(LG)2-188/SSRC/2018</u> dated <u>05/04/2018</u> twenty (20) percent by promotion, on the basis of seniority cure litness, from amongst the Naib Qasids and Chokidars in the village council / Neighborhood council with seniority at tensil level, having Secondary School Certificate and Second Division from a recognized Board or instituted and six months. Diploma in IT from recognized Board/Institute with (03) Service as such. According to the said Service rules to observe the 20% promotion quota,(12)No, posts of Secretaries VC/NCs (BPS-09) are required to be filled amongst the Class-IVs. The committee was requested to examine the suitability of the eligible candidates for promotion.

As the seniority list was prepared on Tehsil basis, therefore. The promotion as also to be made on the same line the following post are lying in Tehsil level.

	Vacant Post VC/NCs	Tehsil
5.No	Tarki Khel	. Karak
	Jahangiri	Takhti Nasrati
<u> </u>	Takhti Nasrati Paya	Takhti Nasrati
3	Mardan Khel	B D Shah
4	Esak Khummari	B D Shah
5 .		B D Shah
6	Mami Khel	D D Sitem

The committee thoroughly examined the suitability of all the eligible candidate and promotion of the following four (04) No. of Class-IVs to the post of Secretary VC/NCs (BPS-09) on the basis of seniority-cum fitness and full observance of the rules and regulation:-

S.No	Name of Class-IV	Vacant Post VC/NCs	Tehsil
1	Mir Daraz	Tarki Khel	,Karak
	Nak Nawaz	Jahangiri	Takhti Nasrati
3	Sartaj khan	Takhti Nasrati Paya	Takhti Nasrati
4	Nisar Utiah	Mardan Khel-	B D Shah

In case of the remaining four (08) posts falls under the promotion quota the committee decided that these posts will be filled in the next DPC meeting in near future The meeting ended with the vote of thanks to end from the chair.

Wembe Shakeel Ahmad, Assistant Engineer,

LG & RDD KARAK

Chairman,

Muhammad Naeem Khan Kundi, Assistant Director,

LG & RDD KARAK

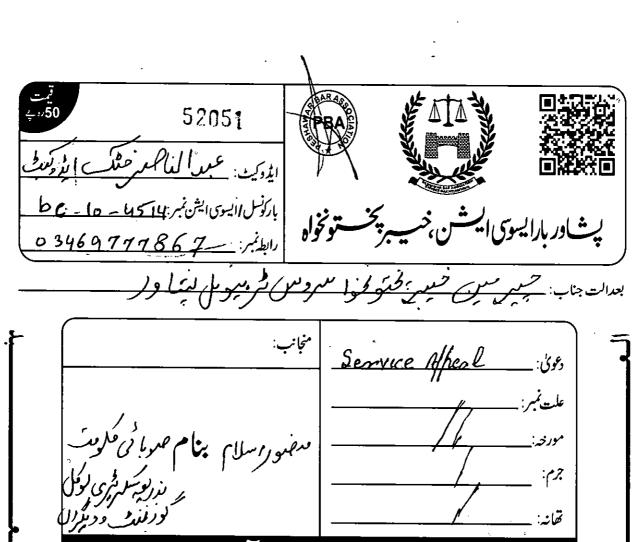
Musam Khan Kundi, Assistant Director, LG & RDD Lakki Marwat

1. The Director General LG & RDD Khyber Pakhtunkhwa, Peshawar. Cc:

2. Section Officer Establishment LG & RDD Khyber Pakhtunkhwa, Peshawar.

PS to Secretary LG & RDD Khyber Pakhtunkhwa, Peshawar.

ssistant Director, LG&RDD Karak.



باعث تحرير آنكه

مقدم مندرج عنوان بالا میں اپی طرف سے واسطے پیروی و جواب دہی کا روائی متعلقہ

آن مقام النہ النہ النہ کہ اللہ علیہ کی کمیں کھی کی کا روائی کا کامل افتیار ہوگا ، نیز و کیل صاحب کو و کی اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدہ کی کل کاروائی کا کامل افتیار ہوگا ، نیز و کیل صاحب کو راضی نامہ کرنے و تقر ر فالٹ و فیصلہ بر طلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہرقم کی تقدین زریں پر دینے اکر کے کا افتیار ہوگا ، نیز بصورت عدم پیروی یا ڈگری کی طرفہ یا ایک کی برآ مدگی اور منسوئی ، نیز دائر کرنے ایک گرائی و نظر فائی و بیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدہ فدکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقر رکا افتیار ہوگا اور صاحب مقرر شدہ کو وہ بی جلہ فدکورہ با افتیارات حاصل ہو ل گے اور اس کا ساختہ پر داختہ منظور و تبول ہوگا دوران مقدمہ میں جو نرچہ ہر جانہ التوائے مقدہ کے سب سے ہوگا کوئی تاریخ بیثی مقام دورہ یا حد سے دوران مقدمہ میں جو نرچہ ہر جانہ التوائے مقدہ کے سب سے ہوگا کوئی تاریخ بیثی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ بیروی فدکورہ کریں ، لہذ وکالت نامہ لکھ ویا تاکہ سند رہ المرقوم میں صاحب پابند نہ ہوں گے کہ بیروی فدکورہ کریں ، لہذ وکالت نامہ لکھ ویا تاکہ سند رہ المرقوم میں مورہ و ہوگا ہوں گے کہ بیروی فدکورہ کریں ، لہذ وکالت نامہ لکھ ویا تاکہ سند رہ میں میانہ میں میانہ کر ہے ہوں گے کہ بیروی فدکورہ کریں ، لہذ وکالت نامہ لکھ ویا تاکہ سند رہ میں میانہ میانہ کی ہوں گے کہ بیروں شواہ میں میانہ کی ہوں گے کہ بیروں کے کر ہوں گے کہ بیروں کے کہ بیروں کہ کورہ کر انہوں کے کہ بیروں کے

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نوك:اس دكالت نامر كي فو توكاني نا قابل قبول موكى _

منهوراسل

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL.NO. 7726/2020

VERSUS

- 1. Secretary to Govt of Khyber Pakhtunkhwa for Local Government, Elections & Rural Development Department, Peshawar.
- 2. The Director General Local Govt: & Rural Development, Khyber Pakhtunkhwa, Yeshawar.
- 3. Assistant Director Local Government & Rural Development Department, Karak.
- 4. Mosam Khan, Assistant Director Local Government, & Rural Development Department, Lakki-Marwat, Member DPC.
- 5. Shakeel Ahmad, Assistant Engineer Local Government, & Rural Development Department, Karak, Member DPC presently office of ADLGRDD Lakki-Marwat.
- 6. Mir Daraz Secretary Village Council Tarki Khel Tehsil & District Karak.
- 7. Naik Nawaz Secretary Village Council Janjangiri Tehsil Takht e Nusrati & District Karak.
- 8. Sartaj Khan, Secretary Village Council Takht-e-Nusrati Tehsil Takht-e-Nusrati & District Karak.
- 9. Nisarullah, Village Council Mardan Khel, Tehsil B.D. Shah, & District Karak.

......Respondents

INDEX

S No.	Description of Documents	Annexure	Page No.
1	Joint Parawise reply	, - , .	1-3
2	Affidavit		4
3	Final Seniority List of Naib Qasid & Chokidar	Annex-A	5-8
4	(Minutes of DPC at Annex-B)	Annex-B	6-7

Respondents

Through

Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAI

<u>PESHAWAR</u>

<u>APPEAL.NO. 7726/2020</u>

Mansoor Islam S/O Islam Badshah Chowkidar Office of the Assistant Director LG&RDD Karak

Annellant.

VERSUS

- 1. Secretary to Govt of Khyber Pakhtunkhwa for Local Government, Elections & Rural Development Department, Peshawar.
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- 9. Nisarullah, Village Council Mardan Khel, Tehsil B.D. Shah, & District Karak.

 Respondent

JOINT PARA WISE REPLY ON BEHALF OF RESPONDENTS No. 1 to 3

Respectfully Sheweth!

Preliminary Objections;

- i. The Appellant has no locus standi and cause of action.
- ii. The Appellant has not come to the Service Tribunal with clean hands.
- iii. The Appellant has submitted incorrect & irrelevant documents and concealing the facts & truth from the Honorable Service Tribunal.
- iv. The Appeal is not maintainable.
- v. The present appeal is time barred.
- vi. That the instant appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
- vii. That this Honorable Tribunal lacks jurisdiction to adjudicate upon the matter.

ON FACTS

- 1. Pertains to record.
- 2. Pertains to record.

- 3. Admitted as correct.
- 4. Pertains to notification.
- 5. Pertains to record.
- 6. Incorrect, the seniority list of the employees is prepared and circulated on the basis of continuous service as Chowkidar/ Naib Qasid on the strength of the office of Assistant Director, LG&RDD, Karak .(Annex-A)
- 7. Incorrect, it is the stance of the appellant without any supporting evidence.
- 8. Correct to the extent that the appellant made a representation against the office No.691/ADLGKK dated 18/02/2020 which could not be disposed off and in the meantime he filed the instant appeal before the service tribunal.
- 9. Reply as per para 8 above.
- 10. No comments.

ON GROUNDS:

- A. Incorrect. Promotion order of Naib Qasids to the post of Village Secretary was made strictly in accordance with the rules/law/policy. The respondent Mr. Mir Daraz stands at Sr. No. 1 of the seniority list while the appellant, Mr Mansoor Islam stands at Sr. No. 6. He would be promoted on his turn as per Law/Rule/Policy in vogue. (Seniority list placed as Annex A).
- B. Promotion order is issued on the recommendation of Departmental Promotion Committee. No injustice has been done to the appellant and his appeal is without merit. (Minutes of DPC at Annex-B)
- C. Reply as per para A & B above.
- D. Incorrect. Promotion on Tehsil basis is made on available vacancies as per 20% promotion quota for Naib Qasid to Village Secretary.
- E. Incorrect. Both the appellant and the respondent belong to the same Tehsil Karak.
- F. Incorrect.
- G. Incorrect.
- H. Further arguments would be presented with permission of the Service Tribunal.

It is, therefore, humbly prayed that the instant Service Appeal being devoid of merita may be dismissed with cost please.

LG&RDD,Karak
Respondent No.3

Director General LG&RD, Khyber Pakhtunkhwa Respondent No.2

Secretary LG,E&RDD, Khyber Pakhtunkhwa Respondent No.1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL **PESHAWAR**

APPEAL.NO. 7726/2020

Mansoor Islam S/O Islam Badshah Chowkidar Office of the

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- 9. Nisarullah, Village Council Mardan Khel, Tehsil B.D. Shah, & District Karak.

.....Respondents.

AFFIDAVIT

I, Mr. Amjad Islam Office Assistant in Directorate General Local Government & Rural Development, Karak do hereby solemnly affirm and declare on oath that Para wise reply in Appeal No.7726/2020 Mansoor Islam versus Government of Khyber Pakhtunkhwa are true and correct to the best of my knowledge & belief and nothing has been intentionally concealed from this Khyber Pakhtunkhwa Service Tribunal Peshawar.

Nótary P

Deponent

CNIC No.16101-9777287-9 Cell No.0317-1775515

Identified By

Additional/Asstt: Advocate General Khyber Pakhtunkhwa



DIRECTORATE GENERAL LOCAL GOVERNMENT & RURAL DEVELOPMENT, KHYBER PAKHTUNKHWA

Dated Peshawar the 28th September, 2021

AUTHORITY LETTER

Mr. Amjad Islam Office Assistant in Directorate General Local Government & Rural Development, Karak hereby authorized to submit the joint parawise reply in Khyber Pakhtunkhwa Service Tribunal Peshawar in Service Appeal No. 7726/2020 Mansoor Islam VS Government of Khyber Pakhtunkhwa, please.

Assistant Director (Litigation)
LG&RDD, Khyber Pakhtunkhwa
Assistant Director (Litigation)
Directorate General LG & RD
Khyber Pakhtunkhwa

RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

£,No	1	DISTRICT KARA	<u>IK</u>
			. Dated,//20
		Tehsil Karak	Datesty

Tel	hsil	Karak	

\$,No	Name		Tehsil Karak	•	
1	Mir Daraz	Designation	Date of Appointment	Date of Birth	Qualification
2	Hazrat Ali	Naib Qasid	01-07-1991	; ,	3
3		Naib Qasid	02-05-1993	12-11-1968	Metric
	Muhammad Ijaz	Naib Qasid		09-01-1967	Metric
4	Naseer Iqbal	Naib Qasid	01-01-1996	01-02-1974	Metric
5	Noor ul Basar	Naib Qasid	02-02-2005	02-02-1978	Metric
6	Mansoor Islam	Chawkidar	02-06-2008	10-03-1993	. 7 th
7 .	Umer Karim	Naib Qasid	31-12-2012	17-07-1989	F,A
8	Rashid Nawaz	Naib Qasid	14-01-2013	01-04-1990	Metric
9	Ikram Ullah	Naib Qasid	30-04-2013	05-02-1990	Metric
10	Adnan hussain	Naib Qasid	10-09-2013	01-04-1937	Metric
11	Arshad Zaman	Najb Qasid	30-09-2015	20-08-1988	Metric .
12	Abid Rasool	Naib Qasid	30-09-2015	27-01-1991	F,A
		1440 Casid	30-09-2015	10-04-1991	D,Com/
13	Junaid Rehman	· Naib Qasid	30-09-2015	00.05.4004	B,Com/Computer,TTB
14	Zeeshan Wajeed	Naib Qasid	30-03-2015	06-05-1994 .	F,A
15	Saqib Junaid	Naib Qasid	30-09-2015	01-01-1994	FSc
16	Asif Rasool	Naib Qasid	30-03-2015	30-04-1996	FSc
17	Amin Ullah	Naib Qasid	·	21-09-1979	Metric
18	Wasim Hayat	Naib Qasid	30-09-2015	20-02-1980	Metric
19	Hakmat Ullah	Naib Qasid	30-09-2015	01-03-1984	Metric
20	Abid Ullah		30-09-2015	10-04-1986	Metric
21	Tahir ul Haq	Naib Qasid	30-09-2015	08-02-1938	Metric
22	Rifaq Ullah	Naib Qasid	30-09-2015	02-04-1987	Metric
23		Naib Qasid	30-09-2015	19-02-1990	
	Asif Iqbai	Naib Qasid	30-09-2015	28-02-1990	Metric
4	Wahid Ullah	Naib Qasid	30-09-2015	25-03-1991	Metric
5	Qasid Iqbal	Naib Qasid	30-09-2015	- 	Metric
5	Sajid Ullah	Naib Qasid	30-09-2015	10-04-1991	Metric
7	Rehmat Ali	Naib Qasid		08-02-1992	Metric
,		Main Mayin	30-09-2015	29-11-1992	Metric

200				04-04-1993	B,A	
	·	-			Metric	
73	Muhammad Mussadiq	Naib Qasid		05-04-1994 10-12-1994	Metric	
, 29		Naib Qasid		02-04-1995	F,A	
30	Mati Ullah	Naib Qasid	20.0015		Metric	
31	Zakir Ullah	Naib Qasid		01-01-1977	B,A	
32	Lai-Zaman	Naib Qasid	12-09-2017	05-04-1988		
33	Muhammad Shoukat .	Naib Qasid	12-03-2027		· +	

Assistant Director LG&RDD Karak

в,А

RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK Dated,//20

TEHSIL TAKHATI NASRATI

	//		THANKING THE TAKEN OF THE PARTY			
l	Nak Nawaz	No. 11 Co.	*			
2	Sadiq Rehman	. Naib Qasid	06-10-1988	30-03-1969	Metric	
3	Sartaj Khan	Naib Qasid	15-05-1995	01-01-1970	Metric	
1	Irfan Ullah	Naib Qasid	03-07-1995	04-12-1969	Metric	
<u></u> 5		Naib Qasid	15-01-2013	10-02-1979	Metric	
	Nasir Iqbal	Naib Qasid	30-09-2015	14-03-1978	Metric	· · · · · · · · · · · · · · · · · · ·
<u>5</u>	Abid Muhammad	Naib Qasid	30-09-2015	09-05-1931	F,A .	
<u>/. </u>	Muhammad Shoaib	Naib Qasid	30-09-2015 .	01-10-1988	M,A	
8	Muhammad Imran	Naib Qasid	30-09-2015	11-02-1936	· FSc	 .
9	Abdul Wahab	Naib Qasid	30-09-2015	25-04-1984	Metric	
10	Wali Rehman	Naib Qasid	30-09-2015	01-08-1969	Metric	
11	Zulfiqar	Naib Qasid	30-09-2015	01-01-1 975	Metric	
12	Muhammad Faroog	Naib Qasid	30-09-2015	01-12-1975	Metric	•••
13	Fazal Dad	Naib Qasid	30-09-2015	01-01-1978	Metric	
14	Muhammad Hilal	Naib Qasid	30-09-2015	01-03-1984	Metric	
15	Faid ur rehman	Naib Qasid	30-09-2015	02-04-1985	Metric	
16	Muhammad Parviz Aslam	Naib Qasid	30-09-2015	25-05-1986	Metric	
17	Wahab ud Din	Naib Qasid	30-09-2015	02-06-1977	Metric	
18	Qaisar Iqbal	Naib Qasid	30-09-2015	19-10-1983	Metric	
19	Arif Mahmood	Naib Qasid	30-09-2015	01-03-1991	Metric	
20	Muhammad Hamayun	Naib Qasid	30-09-2015	30-01-1992	Metric	
21	Izhaar Ullah	Naib Qasid	17-09-2017	08-04-1996	Metric	
22	Irfan Ullah	Naib Qasid	18-09-2017	20-04-1987	FSc	

Assistant Director

FINAL LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND

S,No....

Dated,...../20

· •		;	de capacita	TEHSIL BANDA DAUD SHA	H '	
. ,					01-01-1961	Nil
1	1	Amir Badshah	naib Qasid	23-11-1982	01-07-1961	Nil
√ [2	Nek Daraz	', Naib Qasid	26-07-1992	01-02-1985	Metric
<u> _3</u>	3	Shakir Ullah	F Naib Qasid	10-01-2013	12-08-1989	Metric
4		Nisar Úllah -	Naib Qasid	21-12-2013	05-05-1984	. 8th.
5		Umer Ghani	1 Naib Qasid	31-10-2014	15-06-1981	. Metric
6		Muhammad Israr	Naib Qasid	30-09-2015		F,A
17		Tariq Rehman	Naib Qasid	30-09-2015	08-08-1981	
8_		Bilal Ahmad	Naib Qasid	30-09-2015	05-01-1997	Metric

Assistant Director LG&RDD Karak





Weisster, w<u>ww.lukn.gov.go</u> Emmi address: <u>pikarek agumiteam</u> <u>Plane Number: 0927-29120.</u>

No OGO JADLGKK

Dated Karak the, 12/2/2020

MINUTES OF THE DEPARMENTAL PROMOTION COMMITTEE MEETING HELD ON 17/02/2020 UNDER THE CHAIRMANSHIP OF ASSISTANT DIRECTOR LOCAL GOVERNAMNET AND RURAL DEVELOPMENT DEPARTMENT KARAK

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Assistant Director LG & RDD Karak

Chairman

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As per Service rules notified by the Govt: vide Notification No. <u>SO(LG)2-188/SSRC/2018</u> dated <u>O5/04/2018</u> twenty (20) percent by promotion, on the basis of seniority curn fitness, from amongstithe Naib Qasids and Chokidars in the village council / Neighborhood council with seniority at tehsil level, having Secondary School Certificate and Second Division from a recognized Board or institute and six months. Diploma in IT from recognized Board/Institute with (03) Service as such. According to the said Service rules to observe the 20% promotion quota,(12)No, posts of Secretaries VC/NCs (BPS-09) are required to be filled amongst the Class-IVs. The committee was requested to examine the suitability of the eligible candidates for promotion.

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3	Takhti Nasrati Paya	Takhti Nasrati
4	Mardan Khel	B D Shah
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6	Maini Khel	B D Shah

the committee thoroughly examined the suitability of all the eligible candidate and promotion of the following four (04) No. of Class-IVs to the post of Secretary recommended 5 JNCs (BPS-09) on the basis of seniority-cum fitness and full observance of the rules and régulaidon:-

S.No	Name of Class-IV	Vacant Post	Tehsil
1	Mir Daraz	Tarki Khel	Karak
2	Nak Nawaz	Jahangiri	Takhti Nasrati
2.	Sartaj khan	Takhti Nasrati Paya	a Takhti Nasrati
	พรลา บกลh	folardan-Khel	: B D Shah

In case of the remaining four (08) posts falls under the promotion quota the committee decided that these posts will be filled in the next DPC meeting in near future. The heeting ended with the vote of thanks to end from the chair.

Shakeel Ahmad, Assistant Engineer, LG & RDD KARAK

Muhammad Naeem Khan Kundi, Assistant Director, LG & RDD KARAK

Musam Khan Kundi, Assistant Director, LG 3 kDD Lakki Marwat

1. The Director General LG & RDD Khyber Pakhtunkhwa, Peshawar.

2. Section Officer Establishment LG & RDD Khyber Pakhtunkhwa, Peshawar.

3 PS to Secretary LG & RDD Khyber Pakhtunkhwa, Peshawar.

ssistant Director, G&RIND Karak



<u>IN THE HONOURABLE PESHAWAR HGIH COURT</u>

Writ Petition No. - Lold: B-of 2019

Mir Daraz son of Muhammad Daraz resident of Andi Karak Tehsil & District, Karak presently Naib Qasid at Village Council Ghundi Kalla under the office of Assistant Director LG & RDD Karak -----(Petitioner)

VERSUS

- 1. Secretary Local Government, Election and Rural Development Department Civil Secretariat, Peshawar.
- 2. Director General Local Govt: and Rural Development Department Phase-V Hayat Abad, Peshawar
- 3. Assistant Director Local Govt: and Rural Development Department, Karak. -----(Respondents).

Addresses given above are sufficient for proper service

PETITION ARTICLE CONSTITUTION OF ISLAMIC REPUBLIC PAKISTAN, 1973.

----Respectfully Sheweth

FACTS.

Peshawar High Court That the petitioner was appointed as Naib Qasid on 01/07/1991 in the effect of 01/07/1991 in the office of respondent No. 3 (Assistant Director Local Govt: and Rural Development Department, Karak) and thereafter the petitioner obtained SSC certificate with good second division .(Photocopy of appointment order & SSC Certificate are annexed as Annexure "A").

That the respondent No. 3 has issued appointment of 41 number fresh candidates as Village Secretary vide office order No. 946/ADLG& RDD/KK (Recruitme. dated 23/12/2015, office order No. 663/ADLCKK dated 17/09/2018 & office order No. 95/ADLGKK dated Karak the 14/01/2019 of from 00 minutes

Filed Today al Registrar

f)

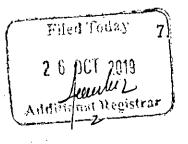
from amongst the Naib Qaisds and Chowkidars in the village / neighborhood council with seniority at Tehsil level, having SSC certificate in second division vide Notification No. SO(LG-1)12-188/SSRC/2018/981 dates Peshawar the, 5th April, 2018 & Notification No. SO(E)LG/2-188/SSRC/2019 dated Peshawar, the 16th October, 2019 whereas the above mentioned amendment notifications have been made Department's Notification No. DG(RWP)/72 **26/01/1978**. -----(Photocopy of appointment orders and notifications are annexed as Annexure "B & C")

- 3. That the respondent No. 3 (Assistant Director LG & RDD, Karak) has issued updated list of vacancies vide office letter No. 287/ADLGKK dated Karak the 22/05/2019 whereby 05 numbers posts of Junior Village Secretary have been shown vacant with the remarks 20% Naib Qasid Quota for promotion. (Photocopy of office letter No. 287/ADLGKK dated Karak the, 22/05/2019 is annexed as Annexure "D").

That the petitioner filed an application before the respondent No. 3 under RTI Act 2013 for provision to appointment order of Irshad Ullah, Aslam Nawaz, Naseeb Ullah, Muhammad Akhlaq and Shahid Iqbal out of which appointment order of Irshad Ullah and Shahid Iqbal was not provided. -----(Photocopy of application dated 09/10/2019 is annexed as Annexure "F").

ATTESTED

Linux Benefit 5.



4 . :

Grounds

- a. That non observing the 20% promotion amongst the existing / in service Naib Qasid and Chowkidar in LG & RDD by the respondents while issuing 46 number fresh appointment order of village secretary is illegal, unlawful, against the law & facts, therefore, respondents are liable to issue promotion order of petitioner from Naib Qasid to the post of Village Secretary in light of promotion policy mentioned above.
- b. That the respondents have violated 20 % promotion amongst the Naib Qasid & Chowkidar to the post of Village Secretary while issuing 46 numbers fresh appointment order of village secretary.
- c. That non compliance of policy of Provincial Govt: regarding promotion of Class-IV employees against the 20% promotion of village council secretariat and filli up the above cited posts by fresh appointment is highly objectionable and reveals clear malafide of respondent No. 3 (Assistant Director LG & RDD Karak).

That filling up all sanctioned posts by initial /fresh appointment and ignoring 20% by promotion of village council secretaries for in-service class—iv employees of the department is clear violation of policy.

That even the respondent No. 3 failed to maintain proper seniority list of in-service Class-IV / Chowkidar for 20% promotion to the post of Village / Neighborhood council Secretary till now.

That the petitioner being senior Naib Qasid is entitled to be promoted to the Village Secretary as the petitioner is performing his duties since 1991 till date.

That presently there are 05 Nos vacant posts of Village Secretary are lying vacant in the office of responde No. 3 (Assistant Director LG & RDD, Karak) but the respondent No. 3 is ignoring the petitioner being senior

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Filed Today

2 5 JULY 2019

G.
Additional Registrar

Naib Qasid to promote to the post of Village Secretary in light of 20% promotion policy mentioned above.

h. That any other points will be pressed during the course of arguments with permission of this Hon'able court.

PRAYER IN WRIT PETITION.

It is, therefore, prayed that on acceptance of this petition, this honourable court may very kindly be pleased to issue writ directing to the respondents to promote the petitioner to the post of Junior Village Council Secretary out of 05 Nos vacant posts of village Secretary by compliance of 20% by promotion quota on the basis of seniority-cum-fitness from amongst the Naib Qasid and Chowkidars in the village / neighborhood council as mentioned in the amendment Notification No. SO (LG-1)12-188/SSRC/2018/981 dates Peshawar the, 5th April, 2018 & Notification No. SO(E)LG/2-188/SSRC/2019 dated Peshawar, the 16th October, 2019.

Further prayed that 20% promotion quota may be granted to petitioner w.e.f 23/12/2015 as the petitioner was entitled to be promoted at the time of 41 Nos fresh appointment of village secretary dated 23/12/2015.

Interim Relief.

By way of interim relief, this honourable court may be restrained the respondents to fill up the vacant posts of village sectary till final decision of the main writ petition

Dated: 23/10/2019

Petitioner Mir Daraz

Through Ahmad Farooq Khattak Advocate, Karak.

Certificate

Certified that no such like writ petition has been filed on similar grounds earlier before this court or any other court.

Petitioner Mir Daraz

m

Law Books

- 1. The constitution of Islamic Republic of Pakistan, 1973.
- 2. Case law according to need.

2 6 Ci 7019

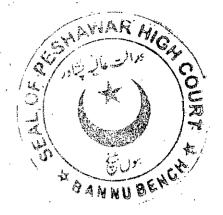
Aristonal Registrar

ATTESTED

EXAMINER

Peshawar High Count

Bannu Bench

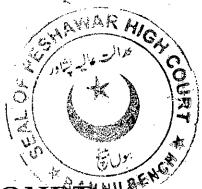


FORM "A" FORM OF ORDER SHEET

Date of	Order or other proceedings with signature of Judge or				
order or	Magistrate and that of parties or counsel where				
proceedings	necessary.				
2.	3.				
12.02.2020	W.P. No. 1068-B/2019. Present:				
	Mr. Ahmad Farooq Khattak advocate for petitioner.				
	Mr. Qudratullah Khan Gandapur Asst: A.G for the official respondents.				
	Amir Muhammad Supervisor, Local Government, Karak. ********				
•	IKRAMULLAH KHAN, J Said Amir				
	Muhammad present on behalf of respondents today in				
	Court produced a copy of meeting dated 04.02.2020				
, .	whereas committee for promotion has already been				
4.	constituted, so grievance of the petitioner has already				
. '	been resolved, as such the instant writ petition is				
•	disposed of accordingly. However, direction is made				
	to respondents to strictly perform and adhere to the				
	law on the subject and right of petitioner, if he is other-				
	wise, eligible for promotion according to rules.				
	Announced 12.02.2020. Sd/ Mr. Justice Ikramullah Khan, J Sd/ Mr. Justice Sahibzada Asadullah, J CERTIFIED TO BE TRUE COPY				
	Vm 2.7.201				
	Examiner				
	Doublewood Himb Court Scoon Roach				

Poshawar High Court Bannu Bench Authorised Under Aracle 87 of

The Qanun-e-Shahadat Ordinance 1984



<u>PESHAWAR HIGH COURT, BANNU BENCH.</u>

FORM 'A'

FORM OF ORDER SHEET

Date of	Order or other proceedings with signature of		
order or	Judge (s).		
proceedings			
(1)	(2)		
	-W.P No.1068-B/2019.		
06.11.2019	Present:		
	Mr. Ahmad Farooq Khattak Advocate for petitioner.		

	Respondents No. 2 and 3 shall file		
	comments to reach this Court within fortnight.		
	Interim Relief.		
	Notice for a short date to be fixed in		
	the month of December, 2019.		
•	Sd/ Mr Justice Muhammad Nasir Mahfooz,J Sd/ Mr.Justice Sahibzada Asadullah,J		
	CERTIFIED TO BE TRUE COPY		
,	Vm 2,2,2		
	Examiner Peshawar High Court Bannu Bench		
	Authorised Under Article 87 of . The Qanun-e-Shahadat Ordinance 1984		
^			
M. In			

of Tilm

TENTATIVE LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT. RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

5,10 577

27

Rehmat Ali

Tehsil Karak

retisti Kajak					
S,No	Name	Designation	Date of Appointment	Date of Birth	Qualification
		Naib Qasid	01-07-1991	12-11-1968	Metric
1	Mir Daraz	Nalb Qasid	02-05-1993	09-01-1967	Metric
2	Hazrat Ali	Naib Qasid	101-01-1996	01-02-1974	Metrie -
3	Muhammad Ijaz Ahmed	Naib Qasid	02-02-2005	02-02-1978	Metric
4	Naseer Iqbal	Naib Qasid	02-06-2008	10-03-1993	7 th
5	Noor ul Basar		31-12-2012	17-07-1989	F,A
6	Mansoor Islam	Chawkidar	14-01-2013	01-04-1990	Metric
7	Umer Karim	Nalb Qasid		05-02-1990	Metric
8	Rashid Nawaz	Nalb Qasid	30-04-2013	<u></u>	Metric
9	Ikram Ullah	Naib Qasid	10-09-2013		Metric,
10	Adnan hussain	Nalb Qasid	30-09-2015	27-01-1991	F,A
11	Arshad Zaman	Nalb Qasid	30-03-2013		D,Com/
12	Abid Rasool	Naib Qasid	30-09-2015	10-04-1251	B,Com/Computer,TTB
		Naib Qasid	30-09-2015	06-05-1994	F,A
13	Junaid Rehman		30-03-2015	01-01-1994	FSc
14	Zeeshan Wajeed	Naib Qasid	30-09-2015	30-04-1996	FSc
15	Saqib Junaid	Nalb Qasid		21-09-1979	Metric .
16	Asif Rasool	Nalb Qasid	. 30 03 2015	20-02-1980	Metric
17	Amin Ullah	Naib Qasid	30-09-2015	01-03-1984	Metric
18	Wasim Hayat	Nalb Qasid	30-09-2015	10-04-1986	
19	Hakmat Ullah	Naib Qasid	30-09-2015		
20	Abid Ullah	Naib Qasid	30-09-2015	08-02-1366	Metric
21	Tahir ul Haq	Nalb Qasid	30-09-2015	02-04-1987	· · Met
22	Rifaq Ullah	Nalb Qasid	30-09-2015	19-02-1990	
23	Asif Iqbal	Nalb Qasid	30-09-2015	28-02-1990	N
24	Wahid Ullah	Naib Qasid	30-09-2015	25-03-1991	
25	Qasid Iqbal	Nalb Qasid	30-09-2015	10-04-1991	
26	Sajid Ullah	Naib Qasid	30-09-2015	08-02-1953	
27	Rehmat Ali	Naib Qasid	30-09-2015	29-11-1992	

Before The K.P. K Service TriBunal Pashouson In Service Appeal No 7726 /2020 Mandoor Islan 1/3 Se Crétain Respectfully Show at.

O Reply on behalf Report No. 6-To 9 1-4. (3) Anner une 6- 16 3 Amesin. B. (4) Angen: 17 - 18 Ethnier. 19 — 23 B Anner C: Tweekalus nounce. After through San Moh lineal the ASIL. Jan II

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

In Re:

Service Appeal No.7726/2020

VERSUS

Secretary Govt. of KPK & others Respondents

REPLY ON BEHALF OF RESPONDENTS No.6 To 9

Respectfully Sheweth:

That the parawise reply in the captioned Service Appeal is submitted as follows:

ON FACTS:

- 1. That Para No.1 pertains to record, however, the appellant has now been dismissed from service vide office Order No.312/ADLGKK dated 08.04.2021. (Copy of Order annexed as annexure "A").
- 2. Para No.2 pertains to academic record of appellant, therefore needs no reply.
- 3. Para No.3 also pertain to record.



- Para No.4 also pertains to record, hence needs no reply.
- 5. Para No.5 is incorrect.
- 6. Para No.6 is incorrect. Respondents No.6 to 9 have been promoted from the post of Naib Qasid to the post of Village Secretaries well in accordance with law, the promotion, policy and rules.
- 7. Para No.7 is incorrect. Furthermore, tentative seniority list was prepared and circulated amongst the Naib Qasid/Chowkidar vide order No.577/ADLGKK dated Karak the 06.12.2019 and the receiving signature of appellant was obtained on the back of list ibid at serial No.2, however, no objection thereto was raised by the appellant within the stipulated period of seven days. (Copy of tentative seniority list alongwith office order No.577/ADLGKK dated 06.12.2019 is annexure as "B").
- 8. Para NO.8 is correct to the extent that appellant had filed a departmental Appeal, however, after considerable delay of about 2/3 months which is badly time barred. (Copy of letter No.720 dated 12.03.2020 is annexed as Annexure "C").



- 9. Para No.9 is incorrect. As stated above that the departmental Appeal of the appellant was badly time barred, however, in response to the letter No. Director (LG)3-40/compliants/2019/16346 dated Peshawar the 5th March, 2020, Para-wise comments had been submitted vide the letter No.720 dated 12.03.2020.
- 10. Para No.10 need no reply.

ON GROUNDS:-

- A. Para (A) is incorrect, the promotion order of Naib Qasid to the post of village Secretary was made strictly in accordance with rules/law, policy.
- B. That Para (B) is incorrect
- C. In response to Para (C) it is submitted that the meeting of DPC was held on 17.02.2020 whereby out of six vacant posts 04 posts were filled by promotion whereas rest of the two posts were reserved for the decision of Peshawar High Court Bannu bench at Tehsil Banda Daud Shah. (Copy of working paper No.677 dated 10.02.2020 and minutes of DPC meeting vide No.690/ADLGKK dated Karak the 10.02.2020 are annexed as Annexure "D" & "E").
- D. Para (D) is incorrect.

- E. Para (E) is incorrect. The promotion of Naib Qasid to the post of secretaries VC/NC is made well in accordance with the policy and rules.
- F. Para (F) is incorrect.
- G. Para (G) is incorrect.
- H. Para (H) of the grounds needs no reply, however further arguments will be presented with the permission of Hon'ble service Tribunal.

Interim Relief

An appropriate order may please be made.

It is therefore most humbly prayed that on appropriate order in accordance with law and relevant rules may please be passed and the Service Appeal of the appellant may kindly be dismissed being without force and merits.

Respondent No.6 to 9

Mir Dara Mir Dona Tr

Respondent No.6

Naik Nawaz / Lahmad

Respondent No.7

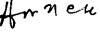
Sartaj Khan

Respondent No.8

Nisar Khan

Respondent No.9

Respondents 0106 to 9 Through Son Mohad Khan Advo Cente se. Jan M. Shows and Shows and ...





OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT KARAK.

Dated **68** /04/2021

OFFICER ORDER

No. 3 2 /ADLGKK. In response to the Notification No. SO (LG-1)2-336/Promotion /AD/2012 dated 16/09/2015 issued by the Local Government Election & Rural Development Department: Government of Khyber Pakhtunkhwa. The competent authority has been pleased to dismiss the services of Mr. Mansoor Islam Chowkidar office of the Assistant Director LG&RDD, District Karak with immediate effect, on the following grounds

- Absent from official Duty i.e Chowkidare (Night time)
- Lodge various anonymous complaints of Ads as well as high authority
- Misplaced various office records of Assistant Director LG&RDD,
- Non obeying the order of the competent authority and create hurdle in office routine work.

Copy forwarded to

1. The Director General EG&RDD Khyber Pakhtunkhwa Peshawar.

2. The Deputy Commissioner Karak

3. The PS to Commissioner Kohat Division Kohat

4. All the head of the line department in District Karak

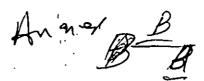
5. The District Accounts Officer Karak for necessary action to stop the salary of the

6. Accountant LG&RDD local office Karak 7. Mr. 2000

Manson Islam 810 Islam Bad 8hah Al

ASSISTANT DIRECTOR LG & RDD, KARAK

TG & ROD, BARAK





OFFIC OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Email address; adkarak@gmail.com Phone Number: 0927-291204

22 /ADLGKK

Dated Karak the,.....

The all Naib qasids/Chawkidar, NCs/VCs

District Karak

Subject : -

TENTATIVE SENIORITY LIST

Memo,

As per policy of provincial Government that the tentative seniority list be circulated amongst all the Naib qasids of Village/ neighborhood Councils. In the light of above direction, the tentative seniority list of VCs/NCs Naib qasids of district Karak is hereby circulated for your information with direction to submitted your objection/ suggestion if any within)7 days positively: Otherwise the undersigned will be presumed that the tentative seniority list will be considered as final seniority list

> Assistant Director LG&RDD Karak

Copy to:-

- PA to Director General LG&RDD PKP Peshawar for information
- Assistant Director (Admin/HR) LG&RDD PKP Peshawar for information

LG&RDD Karak

TENTATIVE LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

570 577

Dated, 6..../.12./2019

Tehsil Karak

S,No	Name	Designation	Date of Appointment	Date of Birth	Qualification
1	Mir Daraz	Naib Qasid	01-07-1991	12-11-1968	Metric
<u>. </u>	Hazrat Ali	Najb Qasid	02-05-1993	09-01-1967	Metric
<u>-</u> 3	Muhammad Ijaz Ahmed	Naib Qasid	101-01-1996	01-02-1974	Metric
<u></u> 1	Naseer Iqbal	Naib Qasid	02-02-2005	02-02-1978	Metric
5	Noor ul Basar	Naib Qasid	02-0 6 -2008	10-03-1993	7 th
 5	Mansoor Islam	Chawkidar	31-12-2012	17-07-1989	F,A
, 7	Umer Karim	Naib Qasid	14-01-2013	01-04-1990	Metric
<u>, </u>	Rashid Nawaz	Naib Qasid	30-04-2013	05-02-1990	Metric
) 9	Ikram Ullah	Naib Qasid	10-09-2013	01-04-1987	Metric
10	Adnan hussain	Naib Qasid	30-09-2015	20-08-1988	Metric
11	Arshad Zaman	Naib Qasid	30-09-2015	27-01-1991	F,A
12	Abid Rasool	Naib Qasid	30-09-2015	10-04-1991	D,Com/ B,Com/Computer,TTB
13	Junaid Rehman	Naib Qasid	30-09-2015	06-05-1994	F,A
14	Zeeshan Wajeed	Naib Qasid	30-09-2015	01-01-1994	FSc
15	Sagib Junaid	Naib Qasid	30-09-2015	30-04-1996	FSc
16	Asif Rasool	Naib Qasid	30-09-2015	21-09-1979	Metric
17	Amin Ullah	Naib Qasid	30-09-2015	20-02-1980	Metric
18	Wasim Hayat	Naib Qasid	30-09-2015	01-03-1984	Metric
19	Hakmat Ullah	Naib Qasid	30-09-2015	10-04-1986	Metric
20	Abid Ullah	Najb Qasid	30-09-2015	08-02-1988	Metric
20 21	Tahir ul Haq	Naib Qasid	30-09-2015	02-04-1987	Metric
<u>21</u> 22	Rifaq Ullah	Naib Qasid	30-09-2015	19-02-1990	Metric
	Asif Iqbal	Naib Qasid	30-09-2015	28-02-1990	Metric
23	Wahid Ullah	Naib Qasid	30-09-2015	25-03-1991	Metric
24		Naib Qasid	30-09-2015	10-04-1991	Metric
25	Qasid Iqbal	Naib Qasid	30-09-2015	08-02-1992	Metric
26	Sajid Ullah Rehmat Ali	Naib Qasid	30-09-2015	29- 11-1992	Metric

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W.



i 28	Muhammad Mussadig	Naib Qasid	30-09-2015	04-04-1993	- В,А	
-		Majb Qasid	30 09-2015	05-04-1994	Metric	
	Zain-uilah	Naib Qasid	30-09-2015	10-12-1994	Metric	
31	Mati Ullah			02-04-1995	F,A	
31	Zakir Ullah	Najb Qasid -	30-09-2015	01-01-1977	Metric	
32	Lal Zaman	Naib Qasid	30-09-2015		B,A ·	
33	Muhammad Shoukat	Nalb Qasid	12-09-2017	05-04-1988	0,0	

Assistant Director

ENTATIVE LIST OF NAIB QASH)/CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

£ 10 577

Dated, ... 6... 1.12... 120 (9

TEHSE TAKHATI NASRATI

1	Nak Nawaz	Naib Qasid	C6 10 1000	120 02 100	
2	Sadiq Rehman	Naib Qasid	C6-10-1988	30-03-1969	Metric
3	Sartaj Khan	Naib Qasid	15-05-1995	01-01-1970	Metric
4	Irfan Ullah	Naib Qasid	03-07-1995	04-12-1969	Metric
5	Nasir Iqbal		15-01-2013	10-02-1979	Metric
6	Abid Muhammad	Naib Qasid	30-09-2015	14-03-1978	Metric
7	Muhammad Shoaib	Naib Qasid	30-09-2015	09-05-1981	F,A
8		Naib Qasid	30-09-2015	01-10-1988	M,A
9	Muhammad imran	Naib Qasid	30-09-2015	11-02-1986	FSc
	Abdul Wahas	Naib Qasid		25-04-1984	Metric
10	Wali Rehmas	Naib Qasid	30-09-2015	01-08-1969	_
11	Zulfiqar	Naib Qasid	30-09-2015	01-01-1975	Metric
12	Muhammad Farooq	Naib Qasid	. 30-09-2015		Metric
13	Fazal Dad	Naib Qasid	30-09-2015	01-12-1975	Metric
14	Muhammad Hilal	Naib Qasid		01-01-1978	Metric
15	Faid ur rehman	Naib Qasid	30-09-2015	01-03-1984	Metric
<u> 16</u>	Muhammad Parviz Aslam		, 30-09-2015	02-04-1985	Metric
17	Wahab ud Din	Naib Qasid	130-09-2015	25-05-1986	Metric
18	Qaisar Iqbal	Naib Qasid	30-09-2015	02-06-1977	Metric
19		Naib Qasid	30-09-2015	19-10-1983	Metric
20	Arif Mahmood	Naib Qasid	30-09-2015	01-03-1991	Metric
	Muhammad Hamayun	Naib Qasid	30-09-2015	30-01-1992	Metric
21	Izhaar Ullah	Naib Qasid	17-09-2017	08-04-1996	
22 1	Irfan Ullah	Naib Qasid	18-09-2017	20-04-1987	Metric
		·	120 03 2017	1 20-04-136/	FSc

Assistant Director

LENTATIVE LIST OF NAIB QASID/CUAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Dated, 6.1.12.120 (9

TEHSIL BANDA DAUD SHAH

			1 1002	01-01-1961	Nil	
1	Amir Badshah	Naib Qasid	23-11-1982	01-07-1961	Nil	
_		Naib Qasid	26-07-1992			
<u> </u>	Nek Daraz	Naib Qasid	10-01-2013	01-02-1985	Metric	
3	Shakir Ullah		21-12-2013	12-08-1989	Metric	
4	Nisar Ullah	Naib Qasid	31-10-2014	05-05-1984	8th	
5	Umer Ghani	Naib Qasid		15-06-1981	Metric	
- -	Muhammad Israr	Naib Qasid	30-09-2015		F,A	
-		Naib Qasid	30-09-2015	08-08-1981		
	Tariq Rehman Kehim	Naib Qasid	30-09-2015	05-01-1997	Metric	
Я	Bilal Ahmad	Main dayin				

/ Assistant Director LG&RDD Karak

B-1



OFFIC OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website, www.lgkp.gcv.pk - Email address; <u>adkarak@gmail.com</u> Phone Number; 0927-291204

No. 622 /ADLGKK

Dated Karak the,..3 ... 1.2/20

٠To

The all Naib gasids/Chawkidar, NCs/VCs

District Karak

Subject : -

FINAL SENIORITY LIST

Memo,

As per policy of provincial Government that the final seniority list be circulated amongst all the Naib qasids of Village/ neighborhood Councils in District Karak.

Enclosed please find herewith the final seniority list all the Naib dasids Chawkidar of village /neighborhood Councils in Karak District fot record.

Assistant Director LG&RDD Karak

Copy to:-

- PA to Director General LG&RDD PKP Peshawar for information
- Assistant Director (Admin/HR) LG&RDD PKP Peshawar for information

Assistant Director

FINAL LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

8:10 622 ADIE/KK

Tehsil Karak

Dated, 3r. 1.12.12019

75	
0	

S,No_	Name	Designation	Date of Appointment	Date of Birth	Qualification
		Naib Qasid	01-07-1991	12-11-1968	Metric
1	Mir Daraz			09-01-1967	Metric
2	Hazrat Ali	- Naib Qasid	/01-01/1996	01-02-1974	Metric :
3	Muhammad Ijaz Ahmid	Naib Qasid	02-02-2005	02-02-1978	Metric
4	Naseer Iqbal	Naib Qasid	02-06-2008	10-03-1993	7 th
5	Noor ul Basar	Naib Qasid	31-12-2012	17-07-1989	F,A
6	Mansoor Islam .	Chawkidar	14-01-2013	01-04-1990	Metric
7	Umer Karim	Naib Qasid	30-04-2013	05-02-1990	Metric
8	Rashid Nawaz	Naib Qasid		03-02-1937	Metric
9-	Ikram Ullah	Naib Qasid	10-09-2013	20-08-1988	Metric
10	Adnan hussain	Naib Qasid	30-09-2015	27-01-1991	F,A
11	Arshad Zaman	Naib Qasid	30-09-2015	10-04-1991	D,Com/
12	Abid Rasool	Naib Qasid	30-09-2015	10-04-1351	B,Com/Computer,TTB
			30-09-2015	06-05-1994	F,A
13	Junaid Rehman		30-09-2015	01-01-1994	FSc
14	Zeeshan Wajeed	Naib Qasid	30-09-2015	30-04-1996	FSc
15	Saqib Junaid	Naib Qasid	30-09-2015	21-09-1979	Metric
16	Asif Rasool	Naib Qasid	30-09-2015	20-02-1980	Metric " -
17	Amin Ullah	Naib Qasid		01-03-1984	Metric
18	Wasim Hayat	Naib Qasid	30-09-2015	10-04-1986	Metric
19	Hakmat Ullah	Naib Qasid	30-09-2015	08-02-1988	Metric
20	Abid Ullah	Naib Qasid	30-09-2015	02-04-1987	Metric
21	Tahir ul Haq	Naib Qasid	30-09-2015		Metric
22	Rifaq Ullah	Naib Qasid	30-09-2015	19-02-1990	Metric
23	Asif Iqbal	Naib Qasid	30-09-2015	28-02-1990	Metric
2.0	Wahid Ullah	Naib Qasid	30-09-2015	25-03-1991	
25	Qasid Iqbal	Naib Qasid	30-09-2015	10-04-1991	Metric
26	Sajid Ullah	Naib Qasid	30-09-2015	08-02-1997	Metric
- V -	Rehmat Ali	Naib Qasid	30-09-2015	29-11-1992	Metric

	manasaniaa istassaard	Naib Qasid	30-09-2015	04.04.4002		
i 29	Zain Ullah	Mails O. 11		04-04-1993	B,A	1
3.0	· NA - 41 17/1-1	Naib Qasid	30-00-2015		Metaic	
<u> </u>	Mati Ullah	· i Naib Qasid	30-09-2015			
31	Zakir Ullah		30-03-2013	10-12-1994	Metric -	/N.
122		Naib Qasid	30-09-2015	02-04-1995	ГА	
32	Lal Zaman	Naib Qasid	30.00.0015		F,A	
33	Muhammad Shoukat		30-09-2015	01-01-1977	Metric	, T
	Total annual Siloukat	Naib Qasid	12-09-2017	05-04-1988	B.A	

Assistant Director

FINAL LIST OF YAIB QASID/CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

5 To 622 ADL6/KK

Dated,...30.1.12.12019

TEHSIL TAKHATI NASRATI

1	Nak Nawaz	Naib Qasid	06-10-1988	30-03-1969	184
2	Sadiq Rehman	Naib Qasid	15-05-1995		Metric
3	Sartaj Khan	Naib Qasid		01-01-1970	Metric
4	Irfan Ullah	Naib Qasid	03-07-1995	04-12-1969	Metric
5	Nasir Igbal		15-01-2013	10-02-1979	Metric
6	Abid Mühammad	Naib Qasid	30-09-2015	14-03-1978	Metric
<u>-</u> 7	Muhammad Shoaib	Naib Qasid	30-09-2015	09-05-1981	F,A.
<u>* </u>		Naib Qasid	30-09-2015	01-10-1988	M,A
3	Muhammad Imran	Naib Qasid	30-09-2015	11-02-1986	FSc
	Abdul Wahab	Naib Qasid	30-09-2015	25-04-1984	Metric
10_	Wali Rehman	Naib-Qasid	30-09-2015	01-08-1969	Metric
1	Zulfiqar	Naib Qasid	30-09-2015	01-01-1975	Metric
2	Muhammad Faroog	Naib Qasid	30-09-2015	01-12-1975	Metric
3	Fazal Dad	Naib Qasid	30-09-2015	01-01-1978	Metric
4	Muhammad Hilal	Naib Qasid	30-09-2015	01-03-1984	
.5	Faid ur rehman	Naib Qasid	30-09-2015	02-04-1985	—
.6	Muhammad Parviz Aslam	Naib Qasid	30-09-2015		Metric
7	Wahab ud Din	Naib Qasid	30-09-2015	25-05-1986	Metric
8	Qaisar Iqbal	Naib Qasid		02-06-1977	Metric -
9.	Arif Mahmood		30-09-2015	19-10-1983	Metric
	Muhammad Hamayun	Naib Qasid	30-09-2015	01-03-1991	Metric
<u> </u>	Izhaar Ullah	Naib Qasid	30-09-2015	30-01-1992	Metric
2		Naib Qasid	17-09-2017	08-04-1996	Metric
<u> </u>	Irfan Ullah	Naib Qasid —	18-09-2017	20-04-1987	FSc

Assistant Director

B--1

NAL LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

622 ADL6/KK

Dated 301 12120 19

TEHSIL BANDA DAUD SHAH

			01-01-1961	Nil
Amir Badshah	Naib Qasid	23-11-1982	01-07-1961	Nil
	Naib Qasid	25-07-1992	01-02-1985	Metric
Nek Daraz	Naib Qasid	10-01-2013	- 12-08-1989	Metric
Shakir Ullah	-Naib Qasid	2±-12-2013	05-05-1984	8th
Nisar Ullah	Naib Qasid	31-10-2014	15-06-1981	Metric
Umer Ghani	Naib Qasid	36-09-2015	08-08-1981	F,A
Muhammad Israr	Naib Qasid	30-09-2015	05-01-1997	Metric
Tariq Rehman	Naib Qasid	30-09-2015	05-01-1997	
Bilal Ahmad			-	·

Assistant Director

B-16



OFFIC OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website: www.lgkg.gov.pk Email address: adkarak@umail.com Phone Number: 0927-291204

No, 625 JADLGKK

Dated Karak the, 31.../.../20.149

Certificate

It is certified that the final seniority list of the village Naib qasids of village / Neighborhood cou8ncil of District Karak circulated on dated 31/12/2019 is correct in disputed and not challenged by anyone in the court

Assistant Director
LG&RDD Karak



Anne.

OFFICE OF THE ASSISTANT DIRECTOR
LOCAL GOVERNMENT & RURAL DEVELOPMENT
DEPARTMENT DISTRICT KARAK

Website: <u>www.lgkp.gov.pk</u> Email address: <u>adkarak@gmail.com</u> Phone Number: 0927-291204

ADLGKK/ معرض

Dated Karak, the/2/ 03 / 2020

The Director General LG&RDD KPK Peshawar.

Subject: OBJECTION ON IN-CORRECT AND IMPROPER AND WRONG SENIORITY LIST OF NAIB QASID AND CHOWKIDAR REGARDING TEHSIL KARAK, BD SHAH, AND TAKHTI-E-NASRATI.

Reference to your letter No. Director (LG) 3-34/COMPLAINTS/2019/16354 Dated Peshawar the 5TH March 2020. Paravise comments are as under.

- 1) The tentative seniority list was prepared in the presence of class four union vid this office letter NO 577 ADLGKK Dated 6/12/2019 was circulated amongst the Naib Qasid/Chowkidar and receiving signature were obtained from the complainant signature are serial no 1 and 2.
- 2) The seniority list has been prepared on domicile bases. The official shown in karak tehsil were initially appointed in the karak tehsil.
- 3) Incorrect qualification column is available in the seniority list in column no 6.
- 4) Tentative seniority list was circulated before issuing final seniority list via letter no 577 ADLGKK Dated 6/12/2019 and final seniority list was issued via letter no 622 ADLGKK Dated 30/12/2019.
- 5) It is fact that sanctioned post in karak tehsil are 29 and shows in the seniority list 33 the 4 Naib Qasid were serving in other tehsil ie BD SHAH and TAKHTI-E-NASRATI.
- 6) It is therefore requested that the compliant is not based on facts and may be droped.

Assistant Director

Copy forwarded to:

1. Assistant Director (Admin/HR) LGE&RDD KP Peshawar.

Assistant Director LG & RDD Karak





OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website: <u>www.lekp.gov.pk</u> Email address: <u>adkarak@gmail.com</u> Phone Number: 0927-291204

No. 721 /ADLGKK

Dated Karak, the 12 03 / 2020

To,

The Director General LG&RDD KPK Peshawar,

Subject: -

application for removal of ambiguity

Reference to your letter No. Director (LG) 3-40/APPLICATION/2019/16346 Dated Peshawar the 5TH March 2020. The complainant is place in the seniority list of karak tehsil being a dom.icile holder of karak tehsil.

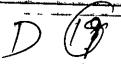
Assistant Director LG & RDD Karak

Copy forwarded to:

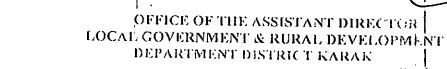
1. Assistant Director (Admin/HR) LGE&RDD KP Peshawar.

Assistant Director LG & RDD Karak









Wensite: www.lgkp.gov.pk Famil address: adkneak a gmail.com Phone Number; 0927-291204

No. 690 /ADLGKK

Dated Karak the

MINUTES OF THE DEPARMENTAL PROMOTION COMMITTEE MEETING HELD ON 17/02/2020 UNDER THE CHAIRMANSHIP OF ASSISTANT DIRECTOR LOCAL GOVERNAMNET AND RURAL DEVELOPMENT DEPARTMENT KARAK

. A meeting of the departmental promotion committee was held on \mathfrak{T}^{out}_{CL} February 2020, on the chairmanship of Assistant Director LG & RDD Karak to examine the suitability eligible Class-IVs for promotion to the posts of Secretaries VC/NCs. The following attended the meeting:

1. Mr Muhammad Naeem Khan Kundi

Assistant Director LG & RDD Karak

Chairman

2. Musam Khan Kundi

Assistant Director LG & RDD Lakki Marwat

Membaer

3. Mr. Shakeel Ahmad

Assistant Engineer LG & RDDKarak

Membaer

The meeting started with recitation from Holy Qur'an. The Changan welcomed the participants and highlighted the purpose. The Committee was informed that six posts of Secretaries VC/NCs are lying vacant and according to the policy / instruction of the Govt, the same is required to be filled in through promotion amongst the Class-IVs of the VC/NCs.

As per Service rules notified by the Govt: vide Notification No. SO(LG)2-188/SSRC/2018 dated 05/04/2018 twenty (20) percent by promotion, on the basis of seniority curr fitness, from amongst the Nath Quanta and Chokidars in the village council / Neighborhood council with seniority at tensil level, having Secondary School Certificate and Second Division from a recognized Board or institute and six months. Diploma in IT from recognized Board/Institute with (03) Service as such, According to the said Service rules to observe the 20% promotion quota,(12)No, posts of Secretaries VC/NCs (BPS-09) are required to be filled amongst the Class-IVs. The committee was requested to examine the suitability of the eligible candidates for promotion.

As the seniority list was prepared on Tehsil basis, therefore. The croshiption as also to be made on the same line the following post are lying in Tehsil level.

S.No	Vacant Post VC/NCs	Tehsil
1	Tarki Khel	Karak
2	Jahangiri	Takhti Nasrati
3	Takhti Nascati Paya	Takhti Nasrati
4	Mardan Khel	B D Shah
5	Esak Khummari	B D Shah
6	Mami Khel	B D Shah

The committee thoroughly examined the suitability of all the chaile candidate and recommended promotion of the following four (04) No. of Class-IVs to the rost of Secretary-VC/NCs (BPS-09) on the basis of seniority-cum fitness and full observance of the rules and regulation:

S.No	Name of Class-IV	Vacant Post	Tehsil
1	Mir Daraz ,	Tarki Khel	Karak
2	Nak Nawaz	Jahangiri	Takhti Nasrati
3	Sartaj khan	Takhti Nasrati Paya	Takhti Nasrati
4	Nisar Ullah	Mardan Khel	B D Shah

In case of the remaining four (08) posts falls under the promotion quota the committee decided that these posts will be filled in the next OPC meeting in near future.

The neeting ended with the vote of thanks to end from the chair.

Member)

Shakeel Ahmad, Assistant Engineer,

LG & RDD KARAK

Chairman

Muhammad Naeem Khan Kundi,

Assistant Director, LG & RDD KARAK

Cc:

- 1. The Director General LG & RDD Khyber Pakhtunkhwa, Peshawar.
- 2. Section Officer Establishment LG & RDD Khyber Pakhtunkhwa, Peshawar.
- 3. PS to Secretary LG & RDD Khyber Pakhtunkhwa, Peshawar.

اللم Assistant Director, LG&RDD Karak.

Musam Khan Kundi,

Assistant Director,

LG & RDD Lakki Marwat



OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

ww.lgkp.gov.pk Emit address; karak a gmail.com Phone Number: 0927-291204

No. />9/ /ADLGKK

Dated Karak the,

10/ EE / 2020

OFFICE ORDER

On the recommendation of the Departmental Promotion Committee, the following Class-IVs are hereby promoted as <u>Secretaries VC/NCs (BPS-09)</u> on regular basis of ice of the Assistant director LG & RDD Karak with immediate effect. They will be on probation for period of a one year which may be extended.

Nam	e of Class-IV	* **	1
Mir E	Daraz ,		•
, Nak i	Nawaz ,		
Sarta	ij khan		
. Nisar	r Ullah		
_	Mir (Nak) Sarta	Name of Class-IV Mir Daraz Nak Nawaz Sartaj khan Nisar Ullah	Mir Daraz , Nak Nawaz , Sartaj khan

Consequent upon their promotion, they are adjusted against the vacant posts, being the resident of the same or adjacent and Tehsil, level in the following VC/NC::-

S.No	Name of Class-IV	Name of	Tehsil
	Promoted to the post of	VC/NCs	
	Secretaries VC/NCs		
1	Mir Daraz	Tarki Khel	Karak
2	Nak Nawaz	Jahangiri	Takhti Nasrati
3	Sartaj khan	Takhti Nasrati	Takhti Nasrati
		Paya	
4	Nisar Ullah	Mardan Khel	B D Shah

Wssistant Director, ILG&RDD Karak,

Cc:

- 1. The Director General LG & RDD Khyber Pakhtunkhwa, Peshawar.
- 2. Registrar Peshawar High Court Bannu Bench.
- 3. Section Officer Establishment LG & RDD Khyber Pakhtunkhwa, Peshawar.
- 4. PS to Secretary LG & RDD Knyber Pakhtunkhwa, Peshawar.
- 5. Deputy Commissioner Karak.
- 6. The District Account Officer Karak.
- 7. Office Assistant AD LG & RDD, Karak.
- 8. Supervisor AD LG & RDD, Karak,
- 9 Official Concerned

Assistant Virector, LG&RDD Karak.



OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website: www.lgkp.gov.rk' • Email address: adkarak@gmnil.com Phone Number: 0927-291204

No. /ga /ADLGKK

Dated Karak the, / 7 / 2019

OFFICE ORDER

In pursuance of notification. No <u>SO(LG-1)2-343/Rect/2014</u> dated <u>07/04/2017</u>, the following Departmental Promotion Committee is hereby constituted for <u>promotion of Class-IVs to the Post of Secretaries VC/NCs</u> in the office of Assistant Director LG & RDD Karak.

1. Mr Muhammad Naeem Khan Kundi

Assistant Director LG & RDD Karak

Chairman

2. Musam Khan Kundi

Assistant Director LG & RDD Lakki Marwat

Membaer Membaer

3. Mr. Shakeel Ahmad

Assistant Engineer LG & RDDKarak

Assistant Director, LG&RDD Karak.

Cc

1. The Director General LG & RDD Khyber Pakhtunkhwa, Peshawar.

2. Section Officer Establishment LG & RDD Khyber Pakhtunkhwa, Peshawar.

3. PS to Secretary LG & RDD Khyber Pakhtunkhwa, Peshawar.

Assistant Director, LG&RDD Karak.



D+ 13

OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RUPAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website: www.lgkp.g.2v.7k Email address adkaru-@gmail com Phore Number: 0927-291204

No. 63 "/ADLGKK

Dated Karak the 4 / 2020

Τо,

The Director General, LG&RDD KPK Peshawar.

.Subject

-MEETING OF DEPARTMENTAL SELECTION/PROMOTION COMMITTÉE
FOR THE PROMOTION OF CLASS-IV TO SECRETARY VILLAGE
COUNCIL (JUNIOR)

Memo,

Kindly refer to the subject cited above, a meeting of departmental promotion committee Karak is scheduled to be held on 17-02-2020 from the post of Naib Qasid /Chowkidar to Sccretary village council (junior) in the office the undersigned as laid, down under rules 10 of the Khyberpakhtunkhwa civil servant (appointment, Promotion and transfer rule 1989). It is therefore requested that a representative may be deputed/nominated to attend the said meeting as provided under rule ibid

Assistant Director LG&RDD Karak

Copy forwarded to:

1. Section Officer (Estab) LGRDD KPK Peshawar for information and necessary (action please.

Assistant Director LG&IDD Karak



Inese

OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Email address: adkarak@gmail.com Phone Number: 0927-291204

77 /ADLGKK

Dated Karak the, _/0/2/2018

WORKING PAPER

There are sixty one (61) sanctioned posts of sectretaries VC/NCs (BPS-09 & 11) in the office of AD LG & RED, Karak out of which six posts are lying vacant. Two No posts are Reserve for the decision of Peshawar High court Bannu Bench at Tehsile B D Shah.

As per service rules notified by the Govt; of Khyber Pakhtunkhwa Local Govt : Election & Rural Development Department Notification No SO(LG)2-188/SSRC/2018 dated 05/04/2018, 20% quota of the total sanctioned posts reserved for promotion of Naib Qasid & Chokidar to the post of Secretary VC/NC having Secondary School Certificate in 2nd division, six moths IT Diploma and three years of service length as such. According to the said Service Rules to observe the 20% promotion quita, tweleve (12) No. Posts of Secretaries VC/NGs (BFS-09) are required to be filled amongst the class-IVs.

A tehsil-wise final seniority list of Class-IVs was prepared and issued vide this office order No. CZZADLGKK dated 30/12/2019 (Annexure A). According to the said list following Class-IVs fulfill the criteria for promotion to the posts Secretaries VC/NCs (BPS-09).

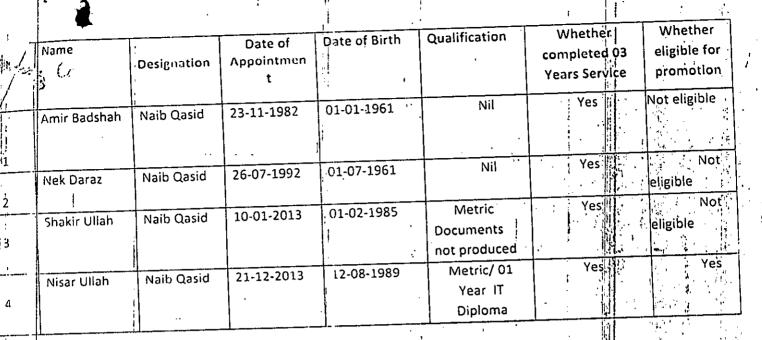
Tehsil Karak

- 1				,			
,No	Name	Designation	Date of Appointment	Date of Birth	Qualification	Whether completed 03 Years Service	Whether eligible for promotion
1	Mir Daraz	Naib Qasid	01-07-1991	12-11-1968	Metric/ 06 Months IT Diploma	Yes	Y∈s
L			<u></u>	Jan Tolchti No	crati	,	

Tehsil Takhti Nasrati

. i			10	IISII TAKIICI ISA			
,Nc	Name	Designation	Date of Appointment	Date of Birth	Qualification	Whether completed 03 Years Service	Whether eligible for promotion
1	Nak Nawaz	Naib Qasid	06-10-1988	30-03-1969	Metric/ 06 Months IT Diploma	Yes	Yes
2	Sadiq Rehman	Naib Qasid	15-05-1995	01-01-1970	Primary	Yes	Not eligib e
3	Sartaj Khan	Naib Qasid	03-07-1995	04-12-1969	Metric/ 06 Months IT Diploma	Yes	Yes

Tehsil Banda Daoud Shah

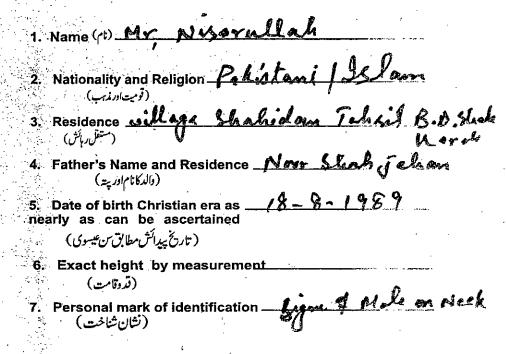


It is certified that the officials included in the panel for promotion are:-

- 1. Hold the lower post on regular basis and are not on ad-hoc basis.
- No departmental/Professional examination has been prescribed for the post which promotion is proposed.
- 3. No departmental inquiry is pending against them.
- 4. Has the prescribed minimum length of the service required under the rules
- 5. The seniority list of the incumbents is un-disputed /final

The Departmental Promotion Committee is requested to determine/examine the suitablity of the above mentioned Class-IVs to the post of Secretaries VC/NCs (BPS-09) under promotion quota on regular basis with imniediate effect.

> Assistant Directo LG&RDD Karak



8. Left hand/right hand thumb and finger impressions of (Non-gazetted officer) (مردکی صورت میں با کیں اور عورت کی صورت میں دا کیں ہاتھ کی انگلیوں کے نشانات

Little Finger (چنگلیا کے ساتھ کی انگلی) Ring Finger (چنگلیا کے ساتھ کی انگلی)

Fore Finger (الگشت شهادت)

(انگونھا) Thun.b



10. Signature and designatin of the head of the Officer or other Attesting Officer

القيراتي كننهاه افسرك د شخط اورمهر) المالياليال المعاملة Assistant Director LO & ROD KARAK

Note: The entries in this page Should be renewed or re-aggested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 hears under this rule.

اس صغہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نبیر 9 اور 10 میں دستخطون کے بینچ تاریخ لکھنی جا بیئے۔ الگیوں کے نشانات کے لئے ہریانچ سال کے بعد تصدیق کی ضرورت نہیں۔

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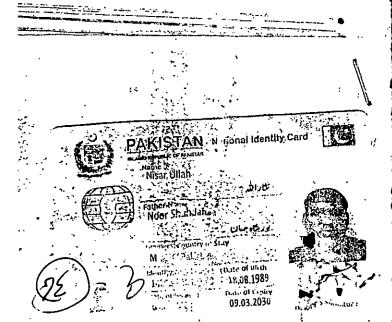
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	tly domiciled in N.W.F.P and having been in this province.	
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	FIKTehsil B.D. Shah	*
	OAH WAZIR	***************************************
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	Dated: 20.2.07 Sign: 21/	
In the pursuance to the	e above declaration Dated <u>2020</u> filed by	21/12
I have satisfied through verificati	ion that the the said is bron of parents who are permanent resident of	niu Kalaan
Tehsil B.D.SHA	NWFP and having been born within it.	
It is here by our	tified according that the above declaration i	s true
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District Officer	Day Month Year Land	haining. Abburer
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جابعالي! تقدیق کی جاتی ہے۔ کہ سمی اسماۃ میں میں اسما ولدادفردد ساكويكله اكاؤل اشم سرعين فريم تحميل طريد دراؤيسه ضلع مر صوبہ خیبر پختو نخواہ کا کی پیدائش اور ستقل رہائش باشندگان ہیں۔اور ذاتی طور پر جانتا ہوں۔ کہاس کے والدین اشو ہر بھی علاقہ مذکورہ کے پیدائش اور مستقل پیدائش باشندگان ہیں۔ اورسیر کہ اچھے شہری ہیں۔ عبده احثيت عمل به مرا ماندورور والم القدين كننده كانام كالحال كالمان كالم ت المان المعلى ا ر پورٹ عرض میک معلق شار امم ک بعدوالدین موضع رور شامه وی ال کا محل پیدائشی اور منتقبل رہائشی باشندگاہ ہیں، عهده/حثيت تقبديق كننده كانام ہرسم کے فارم ملنے کے لئے حیات بک ڈیویا در تھیں فون 210993

1.	Name-	Mr. Amila	Darag	Spo Me kommach. Dan
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- 2. Nationality and Religion of Just Law

 3. Residence— Andli Ulander of Marca.

 Distr. Marca.
- Father's name and residence— Mohamma al Daraz 8/0
 Anali Unali
- Date of birth by Christian era as nearly as 12-11-19648 can be ascertained-
- Exact height by measurement-
- Personal mark for identification—De Tress and asenda: Sent Might a specif if the merel, which is the sent in the character.
- Left hand thumb and finger-impressions of (Non-gazetted) officer:

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of Government servant-

10. Signature and designation of the Head of the Office or other Attesting Officer-

Note__The entries in this page should be renewed or re-aitested at least every five years, and the signatures in lines 9 and 10 should be dated.

Finger prints need not be taken afresh every 5 years under this rule.

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15844 C. YEST AND SECONDARY THE AND SECONDARY THE PROPERTY OF PROVISIONAL CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION Session 19 014 Annual/Supplementary THIS IS TO CERTIFY THAT Son/Daughter of and a candidate of has passed the Secondary School Certificate Examination of the as a Regular/Private candidate. He/She obtained _______ Marks out of 850 and has been placed in Grade(______ ____) Representing ____ The Candidate passed in the following subjects. 1. English 2. Urdu 3. Islamiyat 4. Pakistan Studies Internal assessment Grade by the institution concerned is (______ Date of birth according to admission form is ____ One thousand nine hundred and 5/4/4 Prepared by Checked by Date of Preparation

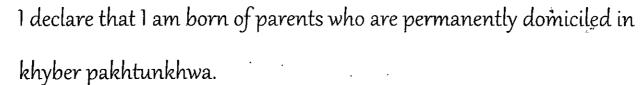
Bebelopment & No.
Heshawar
Established Under National Training Ordinance 1980 Reg. No SDCP/CMICI-KRK/09397 R 邓 No. 009366-2020 Trada Profidency Geriffice This is to certify that Son/Daughter/迪ife of MUHAMMAD DARAZ KHAN MIR DARAZ KHAN Mr/Mrs/Miss.... Has succesfully completed a special training course organized by the SPC Peshawar in the trade of IT (MICROSOFT OFFICE) held at CREATIVE MIND INNOVATIVE (CMI) COMPUTER INSTITUTE, KARAK From 02-06-2019 To 01-12-2019 In recognition thereof this certificate is issued **JANUARY 2020** HAJI MUHAMMAD JAVED CHAIRMAN SDC PESHAWAR

جناب عالى! تقدیق کی جاتی ہے۔مسمی ا**متاق** می<u>سوراز تصدن</u> ساكن محلّه الْ گاؤل المغيم الريم كريك صوبہ خیبر پختو نخواہ کا کی پیدائش اور ستفل رہائش باشندگان ہیں۔اور ذاتی طور پر جانتا ہوں۔ کہ اس کے والدین اشو ہر بھی علاقہ مذکورہ کے پیدائش اور مستقل پیدائشی باشندہ گان ہے۔اوراچھےشہری ہیں عبده احشت سنرمني عالم م را ربورٹ عرض ہے کہ سمی املاق معمر معرار عالی گار کی پیدائش اور مستقل رہائش ہاشندگان ہیں۔ مع 2000



DOMICILE CERTIFICATE

DISTRICT KARAK





S/O, DARAZ KHAN
Was born at Village / Mohallah ANDI KARAK
Tehsil KARAK District KARAK Caste KHATTAK
Date 12 - 10 - 202/ Sign/Thumb Imp: M 5/0.50-3

In pursuance to the above declaration dated 12.10.2021

Filed by MIR DARAZ KHAN I have satisfied myself through ver

That the said is born of parents who are permanent residents of Tehsil,

Khyber Pukhtunkhwa and having been withing it.

It is hereby certified according!

District KARAK

is true.

COUNTERSIGNED

Deputy Continission

No 2440 /Do

_/Dc/Karဲၬ

30013

7. 96. And 8. Ant

Internal assessment Grade awarded by the institution concerned is (= 1)

Date of Birth according to admission form is Chris One thousand nine hundred and

Prepared by.

Checked by_

Date of Preparation_

Asstt: Secretary (Certificates)

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DOMICILE CERTIFICATE

I declare that I am born of parents who permanently domiciled in N. having been born in this Province. I was born at Village TAIKHTE MASRAL Signature Sarlaj Khan Name SARTAJ KHRIN Resident of T- NASRATI Tehsil KARAK District KARAK Dated 20 6 20 In Pursuance to the declaration dated 2 8 9,

Sartan Isham Son of Jet Mohel by Sartag lehan of Twassat Tensil Kaza & District Kazak to the effect that he has beenborn of parents who are permanently domiciled to N. W. F. P. It is hereby certified that the said Sartal Khan's parents are permanent residents of N. W. F. P. having been born within it. I have satisfied my self from my knowledge/by verification through Teli kond, that the above declaration is true and certify accordingly. Given under my hand and the seal of the Court, this 22 14 Attested June 1990.

Attested June 1990.

Attested June 1990.

Attested June 1990.

Attested June 1990.

Attested June 1990.

Attested June 1990.

Attested June 1990.

Attested June 1990. 22/8/90 COUNTERSIGNED Adre Deputy Commissioner, Kara 組在商本組

المن المعالى ا 20/80 0/

OFFICE OF THE DEPUTY COMMISSIONER, KARAK

dated 03/7/95.

No. 5272 /D/Estb:31, Mr. Sar Taj Khan son of Fid Muhammad resident of Takht-e-Nasrati, Teh: T/Nasrati, Listt: Karak is hereby appointed as Naib Qasdd (RPS-1) against one of the vacant posts in this office on provisional basis subject to the approval of the Departmental Promution/Selection Committee. Other terms & conditions of his apptt: are as under:-

- i) His apptt: is purely temporary and is liable to termination at any time without any notice.
- ii) He should produce Health & Age certificate from Mecial Supdt: DHQ Hospital, Karak.

DEPUTY COMMISSIONER, KARAK.

/D/Estb:31 dated: _____/95

Copy forwarded to the:-

1-3. ACs Karak, B.D.Shah & T/Nasrati.

4. DAO Karak

5. Individual concerned.

6. Personal file;

DEPUTY COMMISSIONER, KARAK.

No. /D/Estb:31, Fr. Sar Taj Khan son of Rid Muhammad resident of Takht-e-Nasrati, Teh: T/Nasrati, Distt: Karak is hereby appointed as Naib Qaidd (BPS-1) against one of the vacant posts in this office on provisional basis subject to the approval of the Departmental Promotion/Selection Committee. Other terms & conditions of his apptt: are as under:

- i) His apptt: is purely temporary and is liable to termination at any time without any notice.
- ii) He should produce Health & Age certificate from Mecial Supdt: DHQ Hospital, Karak.

DEPUTY COMMISSIONER, KARAK.

Endst: No.5273-78/D/Estb:31 dated 03/7 15.

Copy forwarded to the:-

1-3. Acs Karok, B.D.Shah & T/Nasrati.

4. DAO Karak.

5. Individual concerned.

6. Fersonal fine.

DEPURY COMPLESIONER, KARAK.

h.M.

E-(51)

EFICE OF THE DEPUTY CONTINUIONS, RARAGE CRDER duted Karak the /0/istb: 122, Following postings/transfers amongst the Clerks and Waib esids are hereby ordered with immediate effect in the interest of public scriice:-S.No. Name & Designation Prom To Remarks 1. Abdul Nabil, Jr. Clerk Main DC's office AC's office Agginst T/Magrati vacent post. Gul Khan Shah, J.C. 2. LC/11 to All T/Nagrati Sar Taj Khan, M/Qasid ~do-ACTS Cfrice Vide T/Nasrati Fazal Khan AC's office izin no s Varce T/Nasrati cifice Mo.3 5. Gul Wali Khan -do-Main DC's office AU's cifice ₹72.0 C 1/Masrati Mo.S 6. Nek Nawaz Khan -do-AC's office, Main DC a T/Nasrati. cilice ز ـ واك Charge/arrival reports be submitted imediataby. DEPUTY CONTRIBUICNES. D/Estb: 122 dated Copy forwarded to their (io 26) Takht-o-Hazrati. 2-7. Officials concerned for compliance. 2-13.Personal files. TY CONSIS ICHTE, KAR



(Affiliated with T.T.B, S.D.C&P.D.P)

Certificate

Mr. / Miss	SARTAJ KHAN	
S/O,D/O	EID MUHAMMAD	
Date of Birth.	04/12/1969	satisfactorily

Passed and Completed the Following Courses

S. No	Courses	S. No	Courses	Duration
1.	MS Word	4.	Typing	
2.	MS Excel	5.	Inpage (Urdu)	6 Months
3.	MS Power Point	6.	Internet	

From Top Hill Computer Institute at Takht-e-NasratiKarak in grade "A". In recognition there of this certificate of achievement is awarded to him/ her on the day 30 of the month of June, 2018.

Principal



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	2. Nationality an	nd Religion —	Parcisto	ni//s	laim
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	3. Residence <u>√</u> (ستقل دہائش)	mage D	in 7.2	sevati	Dis Alfora
	4. Father's Nam نام اور پنڌ)	(والدكا		•	· ·
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(انگشت شهادت) Fore Finger

(چینگلیا) Little Finger

9. Signature of Govt. Servant (سرکاری ملازم کے دستخط)

10. Signature and designatin of the head of the Officer or other Attesting Officer

Union Correspic Distr. Harah

Note: The entries in this page Should be renewed or re-aggested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 hears under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تقیدیق ہونا ضروری ہیں اور نمبر 9اور 10 میں دستخطون کے پنچے تاریخ انگلیوں کے نشانات کے لئے ہرپانچ سال کے بعد تقیدیق کی ضرورت نہیں۔

E-(54)

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N THE HONOURABLE

Writ Petition No. 1068. B. of 2019

Mir Daraz son of Muhammad Daraz resident of Andi Karak Tehsil & District, Karak presently Naib Qasid at Village Council Chundi Kalla under the office of Assistant Director LG & RDD Karak

VERSUS

- Secretary Local Government, Election and Rura Development Department Civil Secretariat, Peshawar 1.
- Director General Local Govt: and Rural Development 2. Department Phase-V Hayat Abad, Peshawar
- Assistant Director Local Govt: and Rural Developmen ----(Respondents) 3. Department , Karak. -----

Addresses given above are sufficient for proper service

ARTICLE WRIT PETITION UNDER CONSTITUTION : OF PAKISTAN, 1973. _______

Respectfully Sheweth

FACTS.

Peshawar Stab Court That the petitioner was appointed as Naib Pasid on 01/07/1991 in the office of respondent No.'3 (Assistant ٦. Rural Development and Director Local Govt: Department, Karak) and thereafter the petitioner obtained SSC certificate with good second division (Photocopy of appointment order & SSC Certificate are annexed as Annexure "A").

Files foday 2 \$ #CT page July 2 Additional Registrar

That the respondent No. 3 has issued appointment of 41 number fresh candidates as Village Secretary vide office order No. 946/ADLG& RDD/KK (Recruitme. dated 23/12/2015, office order No. 663/ADLGKK dated 17/09/2018 & office order No. 95/ADLCKK dated Karak, the 14/01/2019 of fresh 03 candidates without 20% by promotion on the basis of seniority-cum-fitness

from amongst the Naib Qaisds and Chowkidars in the village / neighborhood council with seniority at Tehsil level, having SSC certificate in second division vide Notification No. SO(LG-1)12-188/SSRC/2018/981; date Peshawar the, 5th April, 2018 & Notification No. SO(E)LG/2-188/SSRC/2019 dated Peshawar, the 16 October, 2019 whereas the above mentioned amendment notifications have been 'made Department's Notification No. DG(RWP)/72 datec 26/01/1978. ------------(Photocop) of appointment orders and notifications are annexed to Annexure "B & C")

- 3. That the respondent No. 3 (Assistant Director LG & RDD, Karak) has issued updated list of vacancies vide office letter No. 287/ADLGKK dated Karak the 22/05/2019 whereby 05 numbers posts of Junicy Village Secretary have been shown vacant with the remarks 20% Naib Qasid Quota for promotion. (Photocopy of office letter No. 287/ADLGKK dated Karak the, 22/05/2019 is annexed as Annexure "D").

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6. That the petitioner is aggrieved by non-observing the 20% by promotion on the basis of seniority-cum-fitness from amongst the Naib Qaisds and Chowkidars to post of village secretary in the village / neighborhood council and as there is no other efficacious and adequate remedy is available to the petitioner hence the instant writ petition before this honourable court on the following grounds:

Grounds

- a. That non observing the 20% promotion amongst the existing / in service Nhib Qasid and Chowkidar in LC & RDD by the respondents while issuing 46 number fresh appointment order of village secretary is illegal, unlawful, against the law & facts, therefore, respondents are liable to issue promotion order of petitioner from Naib Qasid to the post of Village Secretary in light of promotion policy mentioned above.
- b. That the respondents have violated 20 % promotion amongst the Naib Qasid & Chowkidar to the post of Village Secretary while issuing 46 numbers fresh appointment order of village secretary.
- c. That non compliance of policy of Provincial Govt: regarding promotion of Class-IV employees against the 20% promotion of village council secretariat and filli up the above cited posts by fresh appointment is highly objectionable and reveals clear malafide of respondent No. 3 (Assistant Director LG & RDD Karak).
- d. That filling up all sanctioned posts by initial /fresh appointment and ignoring 20% by promotion of village council secretaries for in-service class—iv employees of the department is clear violation of policy.

That even the respondent No. 3 failed to maintenth Continuous proper seniority list of in-service Class-IV / Chowkidae for 20% promotion to the post of Village / Neighborhood council Secretary till now.

That the petitioner being senior, Naib Qasid is entitled to be promoted to the Village Secretary as the petitioner is performing his duties since 1991 till date.

That presently there are 05 Nos vacant posts of Village Secretary are lying vacant in the office of responde No. 3 (Assistant Director LG & RDD, Karak) but the respondent No. 3 is ignoring the petitioner being senior

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2 5 JUI 2019 Junio g. Naib Qasid to promote to the post of Village Secretary in light of 20% promotion policy mentioned above.

h. That any other points will be pressed during the course of arguments with permission of this Hon'able court.

PRAYER IN WRIT PETITION.

It is, therefore, prayed that on acceptance of this petition, this honourable court may very kindly be pleased to issue writted directing to the respondents to promote the petitioner to the post of Junior Village Council Secretary out of 05 Nos vacant posts of village Secretary by compliance of 20% by promotion quota on the basis of seniority-cum-fitness from amongst the Naib Qasid and Chowkidars in the village / neighborhood council as mentioned in the amendment Notification No. SO (LG-1)12-188/SSRC/2018/981 dates Peshawar the, 5th April, 2018 & Notification No. SO(E)LG/2-188/SSRC/2019 dated Peshawar, the 16th October, 2019.

Further prayed that 20% promotion quota may be granted to petitioner w.e.f 23/12/2015 as the petitioner was entitled to be promoted at the time of 41 Nos fresh appointment of village secretary dated 23/12/2015.

Interim Relief.

By way of interim relief, this honourable court may be restrained the respondents to fill up the vacant posts of village sectary till final decision of the main writ petition

Dated: - 23/10/2019

etitioner Mir Dara:

Through Ahmad Farooq Khattak
Advocate, Karak.

Certificate

Certified that no such like writ petition has been filed on similar grounds earlier before this court or any other court.

Petitioner Mir Dardz

Law Books

- The constitution of Islamic Republic of Pakistan, 1973.
- Case law according to need.

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FORM "A" FORM OF ORDER SHEET

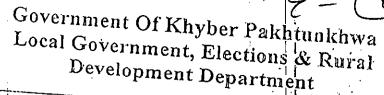
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Date of	Magistrate and that of parties or counsel where
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proceedings	necessary.
12.	
12.02.2020	W.P. No. 1068-B/2019.
12.02.2020	Present:
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]. i	Mr. Ahmad Farooq Khattak advocate
1	for peritioner.
	Mr. Qudratullah Khan Gandapur Asst:
t t	A.G for the official respondents.
	A.G to the official respondence
	Amir Muhammad Supervisor, Local
	Government, Karak.

1	IKRAMULLAH KHAN, J Said Amir
\	Muhammad present on behalf of respondents today in
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	Court produced a copy of meeting dated 04.02.2020
	- \
	whereas committee for promotion has already been
	constituted, so greenance of the petitioner has already
	been resolved, as such the instant writ petition is
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	disposed of accordingly. However, direction is made
İ	to respondents to strictly perform and adhere to the
	law on the subject and right of petitioner, if he is other-
Ì	wise, eligible for promotion according to rules.
	Announced SdlJustice Kramullah Khan,j Sdl Justice Sahibzada Azadullah,J
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(D.B) Hon ble Mr. Justice Ikramullah Khan and Hon ble Mr. Justice Sahibzada Asadullah





NOTIFICATION

Dated Peshawar, the 16th October, 2019

No. SO(E)LG/2-188/SSRC/2019

In exercise of the powers conferred by sub-rule (2)

of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1689, the Local Government, Elections and Rural Development Department Khyber

Pukhumkhwa, in consultation with the Establishment & Administration Department and the

Finance Department hereby directs that in this Department's Notification No. DG(RWP)7(2)/73,

. dated 26.01.1978, the following further amendments shall be made, namely:

In the Appendix,-

- Against Serial No. 2, in column No. 6, for the existing entries, the following shall be
 - "Fifty per cent by initial recruitment through Khyber Pakhtunkhwa Public" Services Commission on the pattern of syllabus prescribed for the Officers in V.
 - Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst ii) the Progress Officers with at least three years service as such; and
 - Ten percent by promotion, on the basis of seniority-cum-fitness, from amongst the Sonior Scale Stenographers and Assistants with at least three years service-

Note: For purpose of promotion to the post of Assistant Director against ten percent quota, there shall be maintained a joint seniority list of Senior Scale

- against Serial No. 3, in column No.6, for the existing entries, the following shall be b) substituted, namely:
 - "Fifty (50) per cent by promotion, on the basis of seniority-curn-fitness, rron amongst the Superintendents with at least three years service as such; and
 - Fifty (50) per cent by initial recruitment.";
- against Serial No.5, in column No. 6, for the existing entries, the following shall be c)
 - "Twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst diploma holder Sub-Engineers with at least ton yours service as such; and have passed the prescribed Departmental Examination;
 - Ten per cent by promotion, on the basis of seniority-cum-fitness, from amongst ii) Sub-Engineers with at least five years service as such and who possess .

against Serial No. 6, in column No.6, for the words, colon and slash "Assistants/Accountants/Senior Scale Stenographer", the word "Accountants" shall be substituted; e)

against Serial No. 15A, in column No.6, for the word, figure and brackets "ten (10)", the word, figure and brackets "five (05)" shall be substituted; and f)

- against Serial No. 16, in column No.6 for the existing entry, the following shall be substituted, namely:
 - Twenty (20) per cent by promotion, on the basis of seniority-cum fitness, from amongst the Naib Qasids and Chowkidars in the Village Council/Neighborhood Council with seniority at Tehsil'level (having Secondary School Certificate in Second Division from a recognized Board or Institute and six months Diploma in IT from recognized Board / Institute with three (03) years service as such and
 - ii) Eighty (80) per cent by initial recruitment:

Provided that the candidate shall be preferably a bonafide resident of thesame Village / Neighborhood Council. If such candidate is not available in the same Village Council / Neighborhood Council then the candidate from adjacent Village Council / Neighborhood Council;

Provided further that in case of non-availability of candidate from adjacent Village Council / Neighborhood Council then from any other Village Council / Neighborhood Council in that Tehsil."

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA LG,E&RD DEPARTMENT

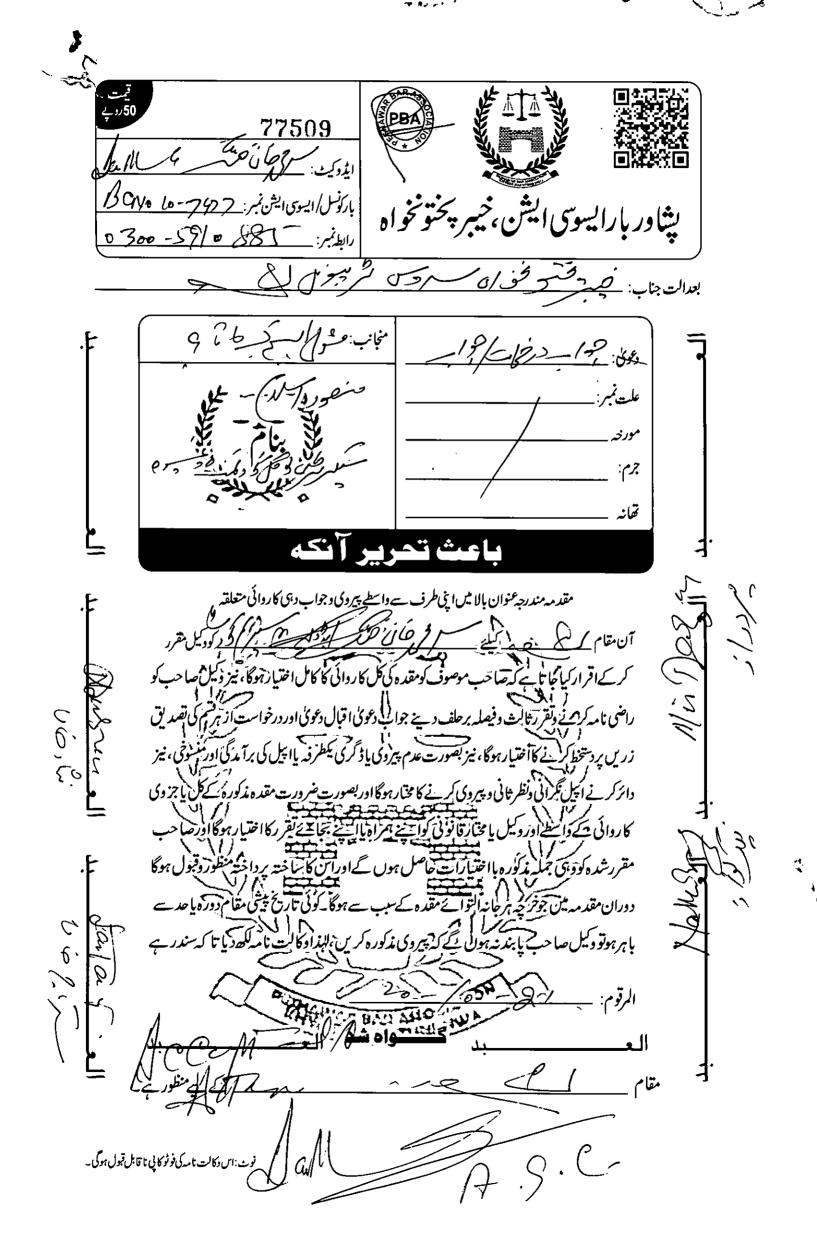
No. SO(E)LG/2-188/SSRC/2019.

Dated Peshawar, the 16th October, 2019

Copy forwarded to:-

- 1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa. 2. All Divisional Commissioners in Khyber Pakhtunkhwa.
- 3. The Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
- 4. The PSO to Chief Minister, Khyber Pakhtunkhwa Peshawar.
- 5. The PSO to Chief Secretary, Khyber Pakhtunkhwa Peshawar.
- 6. The Director General, LG, E&RDD, Khyber Pakhtunkhwa Peshawar.
- 7. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar 8. All Head of Attached Departments in Khyber Pakhtunkhwa.
- 9. All Deputy Commissioners in Khyber Pakhtunkhwa. 10. The Registrar, Peshawar High Court, Peshawar,
- 11. All District and Session Judges in Khyber Pakhtunkhwa.
- 12. All Assistant Directors, LG&RDD in Khyber Pakhtunkhwa.
- 13. The Manager Government printing press, Peshawar for publication in the next Government Gazettee Notification. 100 copies of the Notification may be sent to this Department.
- 14. The PS to Senior Minister for LG,E&RD Khyber Pakhtunkhwa.
- 15. The PS to Secretary LG,E&RDD Peshawar
- 16. The Office Order file.

(HA)I MUHAMMAD) SECTION OFFICER (ESTAR)





OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website: www.lgkp.gov.pk

Email address: adkarak@gmail.com

Phone Number: 0927-291204

No. *7 FD*ADLGKK

Dated Karak the, 2/10/2022

Authority Letter

Mr. Usman Bahadar Progress Officer Local Govt & RDD, Karak is hereby authorized to attend the Govt of Khyber Pakhtunkhwa, Service Tribunal Peshawar in case Service Appeal No.7726/2020 on Dated:10/10/2022 title Mansoor Islam VS Govt of Khyber Pakhtunkhwa through Secretary Local Govt & RDD, Peshawar on behalf of undersigned.

Assistant Director LG & RDD Karak

Writ Petition No. -/aks B of 2019

Mir Daraz son of Muhammad Daraz resident of Andi Karak Tehsil & District, Karak presently Naib Qasid at Village Council Ghundi Kalla under the office of Assistant Director LG & RDD Karak ------(Petitioner).

VERSUS

- 1. Secretary Local Government, Election and Rural Development Department Civil Secretariat, Peshawar.
- 2. Director General Local Govt: and Rural Development Department Phase-V Hayat Abad, Peshawar
- 3. Assistant Director Local Govt: and Rural Development Department, Karak. -----(Respondents).

Addresses given above are sufficient for proper service

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF

Respectfully Sheweth

FACTS.

1. That the petitioner was appointed as Naib Qasid on 01/07/1991 in the office of respondent No. 3 (Assistant Director Local Govt: and Rural Development Department, Karak) and thereafter the petitioner obtained SSC certificate with good second division (

Photocopy of appointment order & SSC Certificate are annexed as Annexure "A").

That the respondent No. 3 has issued appointment of 41 number fresh candidates as Village Secretary vide office order No. 946/ADLG& RDD/KK (Recruitmedated 23/12/2015, office order No. 663/ADLGKK dated 17/09/2018 & office order No. 95/ADLGKK dated Karak, the 14/01/2019 of fresh 03 candidates without 20% by promotion on the basis of seniority-cum-fitness

Filed Today

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Addmonal Registrar



Perhansa Heli Court
Bannu Bench

- 3. That the respondent No. 3 (Assistant Director LG & RDD, Karak) has issued updated list of vacancies vide office letter No. 287/ADLGKK dated Karak the 22/05/2019 whereby 05 numbers posts of Junior Village Secretary have been shown vacant with the remarks 20% Naib Qasid Quota for promotion. (Photocopy of office letter No. 287/ADLGKK dated Karak the, 22/05/2019 is annexed as Annexure "D").

5. That the petitioner filed an application before the respondent No. 3 under RTI Act 2013 for provision of appointment order of Irshad Ullah, Aslam Nawaz, Naseeb Ullah, Muhammad Akhlaq and Shahid Iqbal out of which appointment order of Irshad Ullah and Shahid Iqbal was not provided. -----(Photocopy of application dated 09/10/2019 is annexed as Annexure "F").

How

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Additional Registrar

Grounds



h. That any other points will be pressed during the course of arguments with permission of this Hon'able court.

PRAYER IN WRIT PETITION.

It is, therefore, prayed that on acceptance of this petition, this honourable court may very kindly be pleased to issue writ directing to the respondents to promote the petitioner to the post of Junior Village Council Secretary out of 05 Nos vacant posts of village Secretary by compliance of 20% by promotion quota on the basis of seniority-cum-fitness from amongst the Naib Qasid and Chowkidars in the village / neighborhood council as mentioned in the amendment Notification No. SO (LG-1)12-188/SSRC/2018/981 dates Peshawar the, 5th April, 2018 & Notification No. SO(E)LG/2-188/SSRC/2019 dated Peshawar, the 16th October, 2019.

Further prayed that 20% promotion quota may be granted to petitioner w.e.f 23/12/2015 as the petitioner was entitled to be promoted at the time of 41 Nos fresh appointment of village secretary dated 23/12/2015.

Interim Relief.

By way of interim relief, this honourable court may be restrained the respondents to fill up the vacant posts of village sectary till final decision of the main writ petition

Dated:- 23/10/2019

Petitioner Mir Daraz

Through Ahmad Farooq Khattak Advocate, Karak.

Certificate

Certified that no such like writ petition has been filed on similar grounds earlier before this court or any other court.

Petitioner Mir Daraz

Law Books

1. The constitution of Islamic Republic of Pakistan, 1973.

2. Case law according to need.

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Actional Registrar

ATTESTED

EXAMINER

Peshawar High Court

Bannu Bench

FORM "A" FORM OF ORDER SHEET

Date of	Order or other proceedings with signature of Judge or
order or	Magistrate and that of parties or counsel where
proceedings	necessary.
2.	3.
12.02.2020	<u>W.P. No. 1068-B/2019.</u> <u>Present:</u>
	Mr. Ahmad Farooq Khattak advocate for petitioner.
	Mr. Qudratullah Khan Gandapur Asst: A.G. for the official respondents.
,	Amir Muhammad Supervisor, Local Government, Karak. *******
	IKRAMULLAH KHAN, J Said Amir
	Muhammad present on behalf of respondents today in
	Court produced a copy of meeting dated 04.02.2020
	whereas committee for promotion has already been
	constituted, so grievance of the petitioner has already
	been resolved, as such the instant writ petition is
	disposed of accordingly. However, direction is made
:	to respondents to strictly perform and adhere to the
	law on the subject and right of petitioner, if he is other-
	wise, eligible for promotion according to rules.
	Announced Sd/ Mr. Justice Ikramullah Khan, J Sd/ Mr. Justice Sahibzada Asadullah, J
	CERTIFIED TO BE TRUE COPY Examiner And And And And And And And And And And
-	Peshawar High Court Ban Withch Authorized Under Article Val of
14 - 1 m	The Qanum-e-Shahadat Ordinance 198-

My / or Mimranulla

(D.B) Hon'ble Mr. Justice Ikramullah Khan and Hon'ble Mr. Justice Sahibzada Asadullah

بحدمت جناب اسشنث ڈائز مکٹر بلدیات ودہی ترقی کرک

عنوان: درخواست برائے تقرری (Appointment) بحسثیت ویلج کوسل سکریزی (V.C)

جناب عالى!

سائل نہایت مود بانہ گزارش کرتا ہے، کہ سائل کرتقرری مورخہ 1993-2.5 کو محکمہ بلدیات مین ملازم درجہ چھارم کی حثیت ہو چکی ہے۔ اور تا جال اسی پوسٹ خدمات انجام دے رہاہے ۔اور آج کل ویلی کوسل عیسک خماری میں فرائض

یہ کہ سائل کو معلوم ہوا، کہ ویلے کونسل سکر بڑی محمد شفا مور خد 2022-02-28 کوریٹائر ہور ہاہے اس کے علاوہ میرے ویلے کونسل عیسک خماری میں بھی سکر بڑی کی اسامی بوجہ فوت ہونے افتحار سکر بڑی ویلے کونسل عیس خماری خالی بڑی ہے۔ یہ کہ سائل سنیر کلاس فور ہے اور ویلے کونسل سکر بڑی کے لیے اھل ہے لہذا استدعا ہے کہ بہ منظوری در حواست ھذا سائل کو ویلے کونسل سکر بڑی ان خالی اسامیوں میں سے ایک پر تغنیات فر مایا جائے ،

كاني برائے اطلاع

ا_ڈائر یکٹوجزل محکمہ بلدیات بیثاور

۲_ ڈیٹی کمشنرکرک ضلع کرک

حضرت على ولدقهم با دشاه كلاس فورونج كونسل عيسك خمارى مخصيل بانثره داودشاه تلع كرك

Carl Destill. V

Dir Received

24/2/22



OFFIC OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website; <u>www.lgkp.gov.pk</u> Email address; <u>adkarak@gmail.com</u> Phone Number; 0927-291204

No, 577 /ADLGKK

To

The all Naib gasids/Chawkidar, NCs/VCs

District Karak

Subject : -

TENTATIVE SENIORITY LIST

Memo,

As per policy of provincial Government that the tentative seniority list be circulated amongst all the Naib qasids of Village/ neighborhood Councils.

In the light of above direction, the tentative seniority list of VCs/NCs Naib qasids of district Karak is hereby circulated for your information with direction to submitted your objection/ suggestion if any within)7 days positively. Otherwise the undersigned will be presumed that the tentative seniority list will be considered as final seniority list

Assistant Director

LG&RDD Karak

Copy to:-

- PA to Director General LG&RDD PKP Peshawar for information
- Assistant Director (Admin/HR) LG&RDD PKP Peshawar for information

Assistant Director LG&RDD Karak

ENTATIVE LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

10....577

Dated, 6..../.12./2019

Tehsil Karak

lo	Name	Designation	Date of Appointment	Date of Birth	Qualification
		Naib Qasid	01-07-1991	12-11-1968	Metric
	Mir Daraz	Naib Qasid	02-05-1993	09-01-1967	Metric
	Hazrat Ali		101-01-1996	01-02-1974	Metric
	Muhammad Ijaz A hmed	Naib Qasid	02-02-2005	02-02-1978	Metric
	Naseer Iqbal	Naib Qasid	02-06-2008	10-03-1993	7 th
	Noor ul Basar	Naib Qasid	31-12-2012	17-07-1989	F,A
_	Mansoor Islam	Chawkidar	14-01-2013	01-04-1990	Metric
	Umer Karim	Naib Qasid		05-02-1990	Metric
	Rashid Nawaz	Naib Qasid	30-04-2013	01-04-1987	Metric
	Ikram Ullah	Naib Qasid	10-09-2013	20-08-1988	Metric
	Adnan hussain	Naib Qasid	30-09-2015	27-01-1991	F,A
	Arshad Zaman	Naib Qasid	30-09-2015	10-04-1991	D,Com/
	Abid Rasool	Naib Qasid	30-09-2015	10-04-1991	B,Com/Computer,TTB
		Naib Qasid	30-09-2015	06-05-1994	F,A
	Junaid Rehman	Naib Qasid	30-09-2015	01-01-1994	FSc
	Zeeshan Wajeed	Naib Qasid	30-09-2015	30-04-1996	FSc -
	Saqib Junaid		30-09-2015	21-09-1979	Metric
	Asif Rasool	Naib Qasid	30-09-2015	20-02-1980	Metric
	Amin Ullah	Naib Qasid	30-09-2015	01-03-1984	Metric
	Wasim Hayat	Naib Qasid	30-09-2015	10-04-1986	Metric
1	Hakmat Ullah	Naib Qasid	30-09-2015	08-02-1988	Metric
1	Abid Ullah	Naib Qasid	30-09-2015	02-04-1987	Metric
	Tahir ul Haq	Naib Qasid		19-02-1990	Metric
	Rifaq Ullah	Naib Qasid	30-09-2015	28-02-1990	Metric
	Asif Iqbal	Naib Qasid	30-09-2015	25-03-1991	Metric
ļ	Wahid Ullah	Naib Qasid	30-09-2015	10-04-1991	Metric
5	Qasid Iqbal	Naib Qasid	30-09-2015		Metric
	Sajid Ullah	Naib Qasid	30-09-2015	08-02-1990	Metric
7	Rehmat Ali	Naib Qasid	30-09-2015	29-11-1992	MERIC

				04-04-1993	B,A
	The American	I Nain Oasio	30-09-2013	05-04-1994	Metric
	Muhammad Mussadiq	I Main Uasiu	30-09-2013	10-12-1994	Metric
	Zain Ullah	i Nain Qasiu	30-09-2013	02-04-1995	F,A
ļ -	Mati Ullah	I Nain Gasio	30-09-2013	01-01-1977	Metric
31	Zakir Ullah	1 Main Dasii	30-09-2015	05-04-1988	В,А
32	Lal Zaman	Naib Qasid	12-09-2017		•
33	Muhammad Shoukat		•		:

√Assistant Director LG&RDD Karak

TENTATIVE LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

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	10 .			•
		 		1

Dated, 6.1.12.120 (9

TEHSIL TAKHATI NASRATI

<u>. </u>		· ————		,
Nak Nawaz	Naib Qasid	06-10-1988		
Sadiq Rehman	Naib Qasid		30-03-1969	Metric
Sartaj Khan	Naib Qasid	15-05-1995	01-01-1970	Metric
Irfan Ullah	·· -·	03-07-1995	04-12-1969	Metric
Nasir Igbal	Naib Qasid	15-01-2013	10-02-1979	Metric .
Abid Muhammad	Naib Qasid	30-09-2015	14-03-1978	Metric
	Naib Qasid	30-09-2015	09-05-1981	F,A
Muhammad Shoaib	Naib Qasid	30-09-2015	01-10-1988	
Muhammad Imran	Naib Qasid	30-09-2015	11-02-1986	M,A
Abdul Wahab	Naib Qasid	30-09-2015	25-04-1984	FSc
Wali Rehman	Naib Qasid	30-09-2015		Metric
Zulfiqar	Naib Qasid	30-09-2015	01-08-1969	Metric
Muhammad Farooq	Naib Qasid	30-09-2015	01-01-1975	Metric
Fazal Dad	Naib Qasid		01-12-1975	Metric
Muhammad Hilal	Naib Qasid	30-09-2015	01-01-1978	Metric
Faid ur rehman		30-09-2015	01-03-1984	Metric
Muhammad Parviz Aslam	Naib Qasid	30-09-2015	02-04-1985	Metric
Wahab ud Din	Naib Qasid	30-09-2015	25-05-1986	Metric
	Naib Qasid	30-09-2015	02-06-1977	Metric
Qaisar Iqbal	Naib Qasid	30-09-2015	19-10-1983	Metric
Arif Mahmood	Naib Qasid	30-09-2015	01-03-1991	
Muhammad Hamayun	Naib Qasid	30-09-2015	30-01-1992	Metric
Izhaar Ullah	Naib Qasid	17-09-2017		Metric
Irfan Ullah	Naib Qasid	18-09-2017	08-04-1996	Metric
	20010	10-03-2017	20-04-1987	FSc

Assistant Director LG&RDD Karak

	E LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL CO	VERNI	in Pa	(ไฟไ)
TATIVE	E LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OFFICE OFFICE OFFICE OFFIC			an a f
		Dated	61	1.12.

575

Dated, 6...1.1.120 (5)

TEHSIL BANDA DAUD SHAH

			01-01-1961	Nil
Ai. Dodebah	Naib Qasid	23-11-1982		Nil
Amir Badshah	Naib Qasid	26-07-1992	01-07-1961	
Nek Daraz		10-01-2013	01-02-1985	Metric
Shakir Ullah	Naib Qasid		12-08-1989	Metric
Nisar Ullah	Naib Qasid	21-12-2013		8th
	Naib Qasid	31-10-2014	05-05-1984	
Umer Ghanl		30-09-2015	15-06-1981	Metric
Muhammad Israr	Naib Qasid	30-09-2015	08-08-1981	F,A
Tarig Rehman Richim	Naib Qasid		05-01-1997	Metric
Bilal Ahmad	Naib Qasid	30-09-2015	03-01-1337	

Assistant Director



OFFIC OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

No, 622 /ADLGKK

Dated Karak the, 34/12/20

To

The all Naib qasids/Chawkidar, NCs/VCs

District Karak

Subject : -

FINAL SENIORITY LIST

Memo,

As per policy of provincial Government that the final seniority list be circulated amongst all the Naib qasids of Village/ neighborhood Councils in District Karak.

Enclosed please find herewith the final seniority list all the Naib qasids/ Creation of village /neighborhood Councils in Karak District for record.

Assistant Miratior LCS/COMerak

Copy to:-

- PA to Director General LG&RDD PKP Peshawar for information
- Assistant Director (Admin/HR) LG&RDD PKP Peshawar for information

Assistant Director LG&RDD Karak

BURAL LIST OF NAIR QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT AND

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Tehsil Karak

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// #1/"TTUT	729	ol vik

noiteaitileu.D	Date of Birth	JnaminioqqA lo ated	Designation	Name	on's
Metric	12-11-1968	1661-70-10	biseD dieN	in Daraz	Į Į
Metric	<u> </u>	05-02-1993	biseD disN	ilA terseH	7
Metric	4761-20-10	9661/10-/01	biseD dieM	Journal J Seil bemmeduM	3
Δ _{rp}	05-05-1978	05-02-2005	biseO dieN	Naseer labal	t
	10-03-1993	8007-90-70	biseD dieN	Noor ul Basat	<u> </u>
F,A Metric	6861-70-71	31-15-5015	Chawkidar	Mansoor Islam	9
oriseM Metric	01-04-1990	14-01-2013	bizsQ disN	Umer Karim	L
Metric	061-70-50	30-04-7013	biseD dieN	Rashid Nawaz	8
Metric	7861-40-10	10-09-2013	biseO dieN	lkram Ullah	6
	20-08-1988	30-09-2012	biseD dieN	nisszud nanbA	10
A,7 \\moO,C \	1661-10-72	\$107-60-08	biseD disN	nsmeZ bedziA	11
B,Com/Computer,TTB	16-0-01	\$107-60-08	biseO disN	looseA bidA	12
A,4	₩66T-S0-90	30-60-2012	biseO dieN	nemdəß bisaul	13
FSc PSc	4661-10-10	30-09-5012	biseD dieN	bəəjeW nedzəəZ	77
- FSc	9661-40-08	30-09-7012	bizsD disN	bienul dipe?	ST
Metric " - Metric	6/61-60-17	30-60-5072	biseO disM	looseA TizA	· 9ī
	70-02-1980	30-60-5012	bizeO disM	dellŲ niṃA	71
Metric	1861-50-10	30-60-5012	biseO dieM	‡sysH mizsW	<u> 81</u>
Metric	9861-40-01	30-60-5012	bizeO djeN	Hakimat Ullah	6T
Metric	8861-20-80	30-60-5012	biseD disN	AbilU bidA	70
Metric	7861-40-20	30-60-5012	biseD disM	Tahir ul Haq	7.7
Metric	19-02-1990	30-60-5012	biseO dieN	Rifaq Ullah	75
Metric	78-02-1990	30-60-5012	biseO disN	ledp1 fieA	73
Metric	1661-80-57	30-60-7012	biseD djeN	dellU bideW	77
Metric	1661-40-01	30-60-7012	biseO disN	Qasid Iqbal	52
Metric	29-11-1992 08-07-1992	30-60-05	Naib Qasid	hellU bite?	No z
	7667 27 67	30-60-08	biseO disN	ilA semdag	*

Muhammad Mussadig	Naib Qasid	30-09-2015	04-04-1993	B,A
Zain Ullah	Naib Qasid	30-09-2015	05-04-1994	Metric
Mati Ullah	Naib Qasid	30-09-2015	10-12-1994	Metric **
Zakir Ullah	Naib Qasid	30-09-2015	02-04-1995	F,A
Lal Zaman	Naib Qasid	30-09-2015	01-01-1977	Metric
Muhammad Shoukat	Naib Qasid	12-09-2017	05-04-1988	B,A

Assistant Director
LG&RDD Karak

622 ADL6/KK

Dated Valle

TEHSIL TAKHATI NASRATI

·		20.02.1969	Metric	
Naib Qasid				
	15-05-1995			
	03-07-1995			
	15-01-2013			
	30-09-2015			
	30-09-2015	09-05-1981		
	30-09-2015	01-10-1988		
		11-02-1986		
		25-04-1984		
		01-08-1969	Metric	
		01-01-1975	Metric	
		01-12-1975	Metric	
		01-01-1978	Metric	
Naib Qasid			Metric	
Naib Qasid			Metric	
Naib Qasid			Metric	
Naib Qasid		·	Metric	·
Naib Qasid			Metric	
Naib Qasid			Metric	-
Naib Qasid				
	17-09-2017			
	18-09-2017	20-04-1987	130	
	Naib Qasid Naib Qasid Naib Qasid Naib Qasid	Naib Qasid 15-05-1995 Naib Qasid 03-07-1995 Naib Qasid 15-01-2013 Naib Qasid 30-09-2015 Naib Qasid 30-09-2015	Naib Qasid 15-05-1995 01-01-1970 Naib Qasid 03-07-1995 04-12-1969 Naib Qasid 15-01-2013 10-02-1979 Naib Qasid 30-09-2015 14-03-1978 Naib Qasid 30-09-2015 09-05-1981 Naib Qasid 30-09-2015 01-10-1988 Naib Qasid 30-09-2015 11-02-1986 Naib Qasid 30-09-2015 25-04-1984 Naib Qasid 30-09-2015 01-08-1969 Naib Qasid 30-09-2015 01-01-1975 Naib Qasid 30-09-2015 01-01-1975 Naib Qasid 30-09-2015 01-01-1978 Naib Qasid 30-09-2015 01-03-1984 Naib Qasid 30-09-2015 02-04-1985 Naib Qasid 30-09-2015 02-06-1977 Naib Qasid 30-09-2015 19-10-1983 Naib Qasid 30-09-2015 01-03-1991 Naib Qasid 30-09-2015 01-03-1991 Naib Qasid 30-09-2015 01-03-1992 Naib Qasid 30-09-2015 01-03-1992 Naib Qasid 30-09-2015 01-03-1992 <td>Naib Qasid 08-10-12-30 Metric Naib Qasid 15-05-1995 04-12-1969 Metric Naib Qasid 15-01-2013 10-02-1979 Metric Naib Qasid 30-09-2015 14-03-1978 Metric Naib Qasid 30-09-2015 09-05-1981 F,A Naib Qasid 30-09-2015 01-10-1988 M,A Naib Qasid 30-09-2015 11-02-1986 FSc Naib Qasid 30-09-2015 25-04-1984 Metric Naib Qasid 30-09-2015 01-08-1969 Metric Naib Qasid 30-09-2015 01-01-1975 Metric Naib Qasid 30-09-2015 01-01-1975 Metric Naib Qasid 30-09-2015 01-01-1978 Metric Naib Qasid 30-09-2015 01-01-1978 Metric Naib Qasid 30-09-2015 01-03-1984 Metric Naib Qasid 30-09-2015 02-04-1985 Metric Naib Qasid 30-09-2015 02-06-1977 Metric Naib Qasid <td< td=""></td<></td>	Naib Qasid 08-10-12-30 Metric Naib Qasid 15-05-1995 04-12-1969 Metric Naib Qasid 15-01-2013 10-02-1979 Metric Naib Qasid 30-09-2015 14-03-1978 Metric Naib Qasid 30-09-2015 09-05-1981 F,A Naib Qasid 30-09-2015 01-10-1988 M,A Naib Qasid 30-09-2015 11-02-1986 FSc Naib Qasid 30-09-2015 25-04-1984 Metric Naib Qasid 30-09-2015 01-08-1969 Metric Naib Qasid 30-09-2015 01-01-1975 Metric Naib Qasid 30-09-2015 01-01-1975 Metric Naib Qasid 30-09-2015 01-01-1978 Metric Naib Qasid 30-09-2015 01-01-1978 Metric Naib Qasid 30-09-2015 01-03-1984 Metric Naib Qasid 30-09-2015 02-04-1985 Metric Naib Qasid 30-09-2015 02-06-1977 Metric Naib Qasid <td< td=""></td<>

Assistant Director LG&RDD Karak

L LIST OF NAIB QASID/ CHAWKIDAR OF THE OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMEN'T AND RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

622 ADL6/KK

Dated, 301.1.12019

TEHSIL BANDA DAUD SHAH

Amir Badshah	Naib Qasid	23-11-1982	01-01-1961	Nil
Nek Daraz	Naib Qasid	26-07-1992	01-07-1961	Ņil
Shakir Ullah	Naib Qasid	10-01-2013	01-02-1985	Metric
Nisar Ullah	Naib Qasid	21-12-2013	12-08-1989	Metric
Umer Ghani	Naib Qasid	31-10-2014	05-05-1984	8th
Muhammad Israr	Naib Qasid	30-09-2015	15-06-1981	Metric
Tarig Rehman	Naib Qasid	30-09-2015	08-08-1981	F,A
Bilal Ahmad	Naib Qasid	30-09-2015	05-01-1997	Metric

Assistant Director LG&RDD Karak



OFFIC OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website: www.lgkp.gov.pk Email address: adkarak@gmail.com Phone Number: 0927-291204

No, 625/ADLGKK

Certificate

It is certified that the final seniority list of the village Naib qasids of village / Neighborhood cou@ncil of District Karak circulated on dated 31/12/2019 is correct an disputed and not challenged by anyone in the court.

Assistant Director LG&RDD Karak



OFFICE OF THE ASSISTANT DIRECTOR LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT DISTRICT KARAK

Website: <u>www.lgkp.gov.pk</u> Email address: <u>adkarak@gmail.com</u> Phone Number: 0927-291204

No. 720 /ADLGKK

Dated Karak, the/2/03/2020

To

The Director General LG&RDD KPK Peshawar.

Subject: - OBJECTION ON IN-CORRECT AND IMPROPER AND WRONG SENIORITY LIST OF NAIB QASID AND CHOWKIDAR REGARDING TEHSIL KARAK, BD SHAH, AND TAKHTI-E-NASRATI.

Reference to your letter No. Director (LG) 3-34/COMPLAINTS/2019/16354 Dated Peshawar the 5TH March 2020. Paravise comments are as under.

- 1) The tentative seniority list was prepared in the presence of class four union vid this office letter NO 577 ADLGKK Dated 6/12/2019 was circulated amongst the Naib Qasid/Chowkidar and receiving signature were obtained from the complainant signature are serial no 1 and 2.
- 2) The seniority list has been prepared on domicile bases. The official shown in karak tehsil were initially appointed in the karak tehsil.
- 3) Incorrect qualification column is available in the seniority list in column no 6.
- 4) Tentative seniority list was circulated before issuing final seniority list via letter no 577 ADLGKK Dated 6/12/2019 and final seniority list was issued via letter no 622 ADLGKK Dated 30/12/2019.
- 5) It is fact that sanctioned post in karak tehsil are 29 and shows in the seniority list 33 the 4 Naib Qasid were serving in other tehsil ie BD SHAH and TAKHTI-E-NASRATI.
- 6) It is therefore requested that the compliant is not based on facts and may be droped.

Assistant Director LG & RDD Karak

uNu

Copy forwarded to:

1. Assistant Director (Admin/HR) LGE&RDD KP Peshawar.

Assistant Director LG & RDD Karak

MMn

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Service Official No

Mansoor Islam

versus Govt of K.P through secretary

L.G & R.D.D & others

Subject: APPLICATION FOR ADJOURNMENT

Respectfully Sheweth

The petitioner (Applicant) submits as following.

- 1. That the above mention titled service appeal has been fixed for preliminary hearing for today.
- 2. That council for appellant Abdul Nasir Khattak advocate has gone to Peshawar High Court Bannu Bench Bannu in another case W.P. No 794-B/2020 titled Zahir Gul as E.O.B.I.
- 3. That counsel for the appellant would be unable to appear before this Honble Tribunal today.

Therefore, it is humbly prayed that on acceptance of his application date of hearing may kindly be adjournment for short date.

Date: 09/09/2020

Appellant

Mansoor Islam

﴿ عدالت عاليه پشاور هاني كورث بنوں بينچ ﴾

مقدمه نبر B/2020- WP 794 -B/2020 عنوان: ظاہرگل

بِوَانِيْوْشِ مِنَامِ: Abdul Nasir Khattak Adv: Karak

بمقام پاور ہائی کورٹ بنوں بینج روبروے عدالت مقر اُن فائے سند مه مند جه عنوان بالا مین تاریخ **بیشی مورخه** 09/09/2020

مذا وكيل سائل كوبذر بعينون بذا مطلع كياجاتا ہے - كه تاريخ فركوره برعدالت بذا ميں بوقت 8:30 بيج برائے بيردي جوابد بي مقدم اسال الله

بے۔ بسورت مدم موجودگی کاروائی حسب ضابط عمل میں لائی جائے گی۔

منابط مل میں لائی جائے گا۔
کود شخط اور مہر عدالت کے ماتھ جاری کیا گیا۔

الم میں میں اللہ میں

31/08/2020