

BEFORE THE KP SERVICES TRIBUNAL, PESHAWAR.

In Re
Service Appeal No:- 894-P/2022

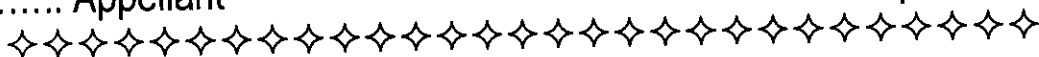
Muhammad Imran

Versus

Govt: of KPK through
Secretary Board of Revenue
KP & others

..... Appellant

..... Respondents



WRITTEN REPLY ON BEHALF OF RESPONDENTS NO 5 & 6.

Respectfully Sheweth:-

Preliminary Objections:-

- i. *That the instant appeal is not competent and not according to service laws.*
- ii. *That the appellant has got no cause of action.*
- iii. *That the appellant has not come to this Honourable Tribunal with clean hands.*
- iv. *That the appellant has no locus standi.*
- v. *That the appeal is badly time barred.*

- vi. *That the instant appeal is not maintainable and barred by the provisions of law.*
- vii. *That the appellant has been estopped by its own conduct to file the instant appeal.*
- viii. *That the appellant is not entitled for the relief, he has brought.*
- ix. *That the appellant has concealed material facts from this Honourable Tribunal.*
- x. *That the instant appeal is bad for mis-joinder and non-joinder of the necessary parties.*
- xi. *That the respondents No 5 & 6 are eligible and competent academically as well as on seniority basis and fulfill the basic requirements of notification dated 25/06/2019 of Board of Revenue, Revenue & Estate Department, Khyber Pakhtunkhwa and letter to Commissioner Peshawar Division, Peshawar dated 20/01/2022, so the order dated 26/01/2022 is in accordance with law, rules, quite legal and based on justice.*

xii. *That the appellant is not eligible for the promotion in light of academically as well as on seniority basis, therefore, order dated 26/01/2022 is accordance with law rule.*

On Facts:-

- 1) *Para No 1 & 2 pertains to appellant record need no reply.*
- 2) *Para No 3 is incorrect, not admitted. That the appellant is junior and ineligible academically as well as seniority basis, the appellant not fulfill the basic requirement of notification dated 25/06/2019 of Board of Revenue & Estate Department Khyber Pakhtunwa and letter to Commissioner dated 20/01/2022, therefore, he is treaded in accordance with law.*
- 3) *Para No 4 is incorrect and , not admitted. That official respondents neither ignored nor infringed, the fundamental/constitutional rights of the appellant, nor promoted the junior/blue eyed employee, but the appellant treated in accordance with law and rules, therefore, seniority list dated 31/12/2022 and impugned order dated 26/01/2022 are quite legal, in accordance with law, rules and based on justice.*
- 4) *Para No 5 need no reply/comments*

5) Para No 6 also wrong, no comments/reply.

On Grounds :-

- A. That ground A is incorrect and not admitted. The seniority list, 31/12/2022 impugned order dated 26/01/2022 are legal, lawful, based on bonafide intention and with jurisdiction, therefore, no ill will is involved in the impugned order dated 26/01/2022, therefore, the order dated 26/01/2022 is in accordance with law, rule, legal footing and is liable to be maintained.
- B. Para B is also incorrect and denied, the appellant was treated in accordance with law and rules, there is no discrimination on respondents parts, because the appellant was not eligible for the promotion in question, therefore, he was not considered in DPC meeting, hence, order dated 26/01/2022 is quite legal and based on justice.
- C. Para C is also incorrect, the appellant neither senior nor eligible academically as well length of service wise nor fulfill the basic requirements of the department notification dated 25/06/2019 of Revenue & Estate Department, therefore, , he was not considered for the promotion in DPC meeting on the other hand respondents No 5 & 6 are senior, eligible and fulfill the basic requirements of the department for

notification dated 25/06/2019 promotion i.e. as academically and on seniority basis, hence respondents No 5 & 6 were considered in DPC meeting, so impugned order dated 26/01/2022 is in accordance with law, rule and is liable to be maintained.

- D. Para D is also incorrect, hence denied. There is no misconduct, negligence, inefficiency, mismanagement on the part of officials respondents and they appreciated the law and rules and finally passed promotion order dated 26/01/2022, which is in accordance with law and rules.*
- E. Para E is also incorrect, hence denied. Because, the impugned order dated 26/01/2022 is based on justice, legal footing, well reasoned and there is no irregularity and illegality on respondents part, hence liable to be maintained.*
- F. Para F is incorrect, hence denied. Because the official respondents exercised their power in accordance with law and rules and treated the appellant in accordance with law, detailed reply already given in the above Paras.*
- G. Para G is incorrect, not admitted. The act of respondents is in accordance with constitution, and civil servants act, detail reply already given in the above Paras.*

- H. *Para H is incorrect, because the respondents adopted the due process of law, which issuing order dated 26/11/2022, therefore, liable to be maintained.*
- I. *Para I incorrect, denied, because no fundamental right had violated of the appellant by the respondents and the appellant was treated in accordance with law, rule and regulation and constitution, Civil Servant Act etc, therefore, Para I is not admitted.*
- J. *Para J is incorrect, hence denied, the actions of respondents is based on legal footing and not malafide, hence Para J is denied, complete reply is already given in the above Paras and preliminary objection as well.*
- K. *Para K is incorrect, hence not admitted, detailed reply has given in the above Paras.*
- L. *Para L need no reply.*
- M. *Para M is incorrect, hence denied. The appellant treated in accordance with law, rule and constitution, no right of appellant was violated by the respondents, hence not admitted.*

7

N. *No comments that the respondents No 5 & 6 also seeks the permission of this Honourable Tribunal to adduce further grounds at the time of arguments.*

It is, therefore, prayed that on acceptance of this reply, the appeal may kindly be dismissed with costs.

Dated:- 24/01/2023

Respondents No 5 & 6

Through:-


Muhammad Anwar Mohmand
Advocate High Court

&


Israr Ud Din
Advocate High Court

BEFORE THE KP SERVICES TRIBUNAL, PESHAWAR.

In Re
Service Appeal No:- 894-P/2022

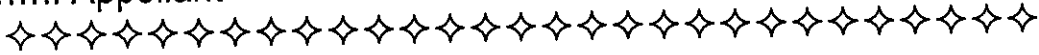
Muhammad Imran

Versus

Govt: of KPK through
Secretary Board of Revenue
KP & others

..... Appellant

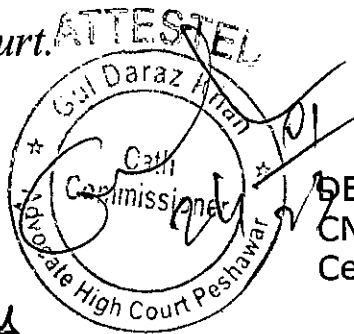
..... Respondents



AFFIDAVIT

I, Maqsood Khan S/o Muhammad Amin R/o Dheri Kallay,
Warsak Road, Peshawar, (The respondent No 5) do hereby
solemnly affirm and declare on oath that the contents of this
accompanying Written Reply are true and correct to the best of
my knowledge and belief and nothing has been concealed from
this Honourable Court.

Identified by




Am
Muhammad Anwar Mohmand
Advocate High Court

DEPONENT [Signature]
CNIC No:- 17301-1420135-1
Cell No:- 0345-9024552.

[Signature]

9

Roll No. 19345


BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION 1990 (ANNUAL)

THIS IS TO CERTIFY THAT Maqsood Khan
 Son/Daughter of Mohammad Amin
 and resident of Govt High School Sher Dad Garhi Wareak (Peshawar)

has passed the **Secondary School Certificate Examination**
 of the Board of Intermediate & Secondary Education, Peshawar held in March 1990
 as a Regular candidate. He/She obtained 369 Marks out of 850
 and has been placed in Grade 3RD Representing Fair

The Candidate passed in the following subjects:

1. Urdu	2. Islamiyat	3. English	4. Pakistan Studies	5. Maths	6. Physics	7. Chemistry	8. Biology
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and is awarded Grade 3RD on the basis of internal
 marks of the Institution concerned.

According to admission form is Eighth February,
Seventy Four 08-02-1974

Issued without

Attested
17-1-90
CS-219

10

65767

Roll No: 68088

PROVISIONAL AND DETAILED MARKS CERTIFICATE
INTERMEDIATE (ANNUAL) EXAMINATION, 2005
HUMANITIES (Part-II)



Maqsood Khan Son of Muhammad Amin
of Peshawar

has secured the marks shown against each subject in the H S S C Examination held in the month of

May as a Private Student

Attached is true copy

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	28 *	--	33	--	61	Sixty-One
Urdu	200	--	--	--	--	85	Eighty-Five
Pak-Studies / Islamic Education	100	--	--	--	--	46	Forty-Six
Civics	200	--	--	--	--	99	Ninety-Nine
Islamic Studies	200	--	--	--	--	101	One Hundred One
Pashto	200	--	--	--	--	90	Ninety Only
Total : 1100						482-D	Four Hundred Eighty-Two Only
Remarks :							

* Passed with grace marks

Checked By : _____

Issue Date: September 22 2005

Controller of Examinations

NOTE Error/Omission accepted. Any mistake in above particulars must be intimated within 30 days of the receiving the certificate.

(Computer Cell BISE Peshawar)

PAKISTAN

Detailed Marks Certificate

Bachelor of Arts
Part-II
Annual Examination 2012
District Peshawar



Private

Name: MAQSOOD KHAN
Father's Name: MUHAMMAD AMIN

Gender: Male Roll No: 62171
Registration No: 07-PC-2371

Papers	Max Marks	Marks Obtained		
		In Figures	In Words	
English (Comp)	75	13	Failed	
Pashto	75	24	Twenty Four	
Islamic Studies	75	41	Forty One	
Pakistan Studies	40	15	Fifteen	
		285	148	One Hundred and Forty Eight
Part-I 53/07 Annual-2011		550	Re: Eng (C)	

*Attested
is from Gpy
[Signature]*

Errors, omissions and subject to subsequent modification

Chances Availed: 5

Examination held From 30-May-2012 to 09-Jul-2012
Result Declared on Friday, September 14, 2012
Issue Date: 25-Sep-2012
1:10 PM

[Signature]
(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Mathra Area

817



ASST. POLITICAL AGENT

AND EKKAGUND, MOHAND AGENCY

DOMICILE CERTIFICATE

Son/Daughter of Miss Magsood Khan
 belongs to and his/her father
 Mohmand Section Parand Sub Section ...
 always a permanent bonafide resident of Mohmand Agency Village ...
 and he/she is an eligible candidate to avail himself/herself of the seats reserved for the
 Special Area of Peshawar Division backward area of Mohmand Agency.
 His/her category of domicile is A1

8146/R.C.
7/2/84

Political Sub Tehsildar
 No. ... / date 1/1/84

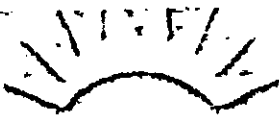
COUNTERSIGNED

POLITICAL AGENT, MOHMANDS,
 CHALLANAI

ASSISTANT POLITICAL AGENT,
 LOWER MOHMANDS, EKKAGHUND

No. ... JARA/LM. Dated ...

*Attached Advocate
 is for copy
 [Signature]*



UNIVERSITY OF PESHAWAR

ROBINSON COLLEGE PESHAWAR

Reg. No. SDC / 1111111111

Serial No. 12345

This is to certify that

Maqsood Khan s/o Muhammad Amin

Was completely fulfilled all requirements of the prescribed

studies & examinations of the institutions in

Certificate in Information Technology

From 6 Jan, 2016 to 5 June, 2016

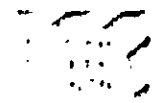
Total Marks	Obtained Marks	Percentage	Grade
100	83	83%	A-1

*Submitted by Maqsood
is true
[Signature]*

CONSTRUCTOR

PROVINCIAL

(13)



ish

PAKISTAN National Identity Card
 ISLAMIC REPUBLIC OF PAKISTAN

Name: Waqar Ul Hassan

Father Name: Saïda Gul

Gender: (Country of Stay) M Pakistan

Identity Number: 17301-5777460-7 Date of Birth: 18.11.1973

Date of Issue: 12.05.2015 Date of Expiry: 12.05.2025

Holder's Signature

14

Hasrat Advaita
 is true
 copy
 people

17301-5777460-7

گمشدہ کارڈ ملنے پر قریبی لیوی بکس میں ڈال دیں

101301067068
 142-92-097509

SA 003

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

PROVISIONAL CERTIFICATE

SECONDARY SCHOOL CERTIFICATE EXAMINATION

Session 19 91 Annual/Supplementary

THIS IS TO CERTIFY THAT

Son/Daughter of
and a candidate of

Sadeeq Ahmad
Pakistan Army School

has passed the Secondary School Certificate Examination of the
Board of Intermediate & Secondary Education, Peshawar held in 1991 as a
Regular/Private candidate. He/She obtained 93 Marks out of 850 and has been placed in

Grade (D) Representing

390.0

The candidate passed in the following subjects:

- 1. English
- 2. Urdu
- 3. Islamiyat
- 4. Pak. Studies

5. G. Maths/Maths (Ele.) 6. 719

Internal assessment Grade awarded by the institution concerned is

Date of Birth according to admission form is

One thousand nine hundred and Sadeeq Ahmad

Checked by

Date of Preparation

Asstt. Secretary (Certificates)-II

Attested in true
copy
[Signature]

0347-9096939

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(GENERAL GROUP)
Session 1991 (Annual/Supplementary)

Name Logar Khan
Father's Name Saida Gul Roll No. 32161

SUBJECT	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	54	Pass
2. Urdu	150	63	
3. Islamiyat Comp:	75	40	
4. Pakistan Studies	75	28	
5. Gen: Mathematics	100	69	
6. General Science	100	41	
7. Is	100	56	
8. Pa	100	39	
Total	850	390	D

This certificate is issued errors and omissions excepted.

Prepared by [Signature]

Checked by [Signature]

Date _____ 19 _____

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

*Attended in fine
Copy
Advocate
[Signature]*

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE
Intermediate Examination Humanities Group
SESSION 19 2000 (Annual/Supplementary)



Sr. No. 136172

Name Muqam ul Hassan

Father's Name Said Gul Roll No. 89416

Subjects	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1. English	200			70	
2. Urdu	200			68	
3. Islamic Education	50			36	
4. Pakistan Studies	50			74	
5. <u>Civ</u>	200			74	
6. <u>Pa</u>	200			97	
7. <u>IS</u>	200				
Total	1100			419	

Note: Errors/Omissions excepted.

Date 25/11/2000 19

[Signature]

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

Prepared by [Signature] Checked By _____

*Attache by Admittance
in four copy
for me*

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

Peshawar N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION

Session 2000 Annual/Supplementary
1st Group

THIS IS TO CERTIFY THAT Waqar ul Hassan

Son/Daughter of Said Gul

and a Candidate of Mohamed Agency

Registered No. _____ has passed the INTERMEDIATE EXAMINATION of the Board of Intermediate and Secondary Education, Peshawar held in June 2000

as a Regular/Private Candidate. He/She obtained 418 Marks out of

1100 and has been placed in Grade (E) Representing Satisfactory

The Examination was taken as a whole/in parts.

Prepared by _____

Checked by _____

Date of Preparation 26/8/2000

[Signature]
Asstt. Secy. (Inter C)
Asstt. Secretary (Certificates)

Attested to be true copy
[Signature]

(19)

GOVERNMENT OF KHYBER PAKHTUNKHWA,
BOARD OF REVENUE,
REVENUE & ESTATE DEPARTMENT

Peshawar Dated the 25/06/2019

NOTIFICATION

No. PRT/13/SSRC/_____ In pursuance of provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Revenue & Estate Department in consultation with Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. 2074/Admin:1/296/Amendment dated: 23.01.2015, the following further amendments shall be made, namely:

AMENDMENTS

APPENDIX:-

- (a) Serial No. 1 and the existing entries against Serial No. 1 shall be deleted;
- (b) against Serial No. 10, in column No.5, for the existing entries, the following shall be substituted, namely:

(a) Thirty three percent by promotion, on the basis of seniority cum- fitness, from amongst the Qasids, Naib Qasids and Process Server including holders of other equivalent posts in the district concerned with two years service as such, who have passed Secondary School Certificate Examination from a recognized Board.

Note: For the purpose of Promotion, joint seniority list of Qasids, Naib Qasids and Process Servers including holders of other equivalent posts shall be maintained with reference to the date of their matriculation or appointment whichever is later.

- (b) Ten percent by promotion, on the basis of seniority-cum-fitness, from amongst Readers, Muharrirs and Record Keepers (BS-07) with at least five years' service as such

Note: For the purpose of promotion, joint seniority list of Readers, Muharrirs and Record Keepers shall be maintained

- (c) fifty seven percent by initial recruitment from the candidates of the district concerned; and

- (c) against serial No. 11, after the existing entry, the following Note shall be added, namely:

"Note:- The posts of Readers and Record Keepers shall be declared as Dying Cadre. On vacation of the above posts by retirement or promotion of the incumbents, no person shall be appointed by initial recruitment to the same and shall forthwith be taken up with the Finance Department for their abolition"

Sd/-
SECRETARY TO GOVERNMENT OF
KHYBER PAKHTUNKHWA
REVENUE & ESTATE DEPARTMENT

Attested true copy
[Signature]



OFFICE OF THE
DEPUTY COMMISSIONER
MOHMAND TRIBAL DISTRICT

Phone 0924-290001 / Fax 0924-290075

No. / 1122 / Acctt:

Dated 11 / December 2021.

To: Commissioner,
Peshawar Division,
Peshawar.

Subject: **NOTIFICATION**

Reference is made Notification No. ESTt/1/11/135/SSRC, dated 25-06-2019 received from Board of Revenue, Revenue & Estate Department, Government of Khyber Pakhtunkhwa, which provides for the seniority criteria of Class-IV employees, relevant para. is quoted as under "Note: for the purpose of promotion, joint seniority list of Qasids, Naib Qasids and Process servers including holders of other equivalent posts shall be maintained with reference to the date of their matriculation or appointment whichever is later".

It is therefore, requested to please provide opinion over the above quoted notification, so as to proceed in light of the Notification, ~~and~~ ^{and} to clear any ambiguity whatsoever, while processing promotion cases of Class-IV employees of District Administration, Mohmand please.

Sl. No.	Name	Designation	Date

1122 7/11/21

For info of
↓
Deputy Commissioner,
Mohmand Tribal District.

Attended
for copy
[Signature]

AR
[Signature]
08/12/21



OFFICE OF THE
COMMISSIONER PESHAWAR DIVISION
PESHAWAR

21

No. 6/2/EA/2021/I/146
Dated: 08.12.2021

To

The Senior Member,
Board of Revenue,
Khyber Pakhtunkhwa.

PS-SMBR
By No. 7782
Date 07/12/21
Govt of Khyber Pakhtunkhwa

Subject: NOTIFICATION.

Dear Sir,

I am directed to enclose herewith a copy of Deputy Commissioner Mohmand letter No.15772/Acctt: dated 07.12.2021 on the subject cited above with the request that necessary legal guidance may kindly be provided to this office please.

ASSISTANT TO COMMISSIONER (REV/GA)
PESHAWAR DIVISION PESHAWAR

No. 6/2/EA/2021/I/14619

Copy forwarded to Deputy Commissioner Mohmand.

ASSISTANT TO COMMISSIONER (REV/GA)
PESHAWAR DIVISION PESHAWAR

S-I

MBA


MBA
10/12

SMBA
9/12

14/12/21

S/E

Attended
for copy
[Signature]

 <p>GOVERNMENT OF KHYBER PAKHTUNKHWA, BOARD OF REVENUE, REVENUE & ESTATE DEPARTMENT.</p>		22
091-9213989	1522-9	091-9214208
No. Estt: II/New/Seniority List/		Peshawar Dated the 20/01/2022

The Commissioner,
Peshawar Division, Peshawar.

SUBJECT: NOTIFICATION.

Dear Sir,

I am directed to refer to your letter No, 6/2/EA/2021/I/14618 dated 08.12.2021 on the subject noted above and to state that ambiguity regarding this Department Notification dated 25.06.2019 mentioned in your letter under reference is hereby explained/cleared as under:-

“(a) Thirty three percent by promotion, on the basis of seniority cum- fitness, from amongst the Qasids, Naib Qasids and Process Server including holders of other equivalent posts in the district concerned with two years service as such, who have passed Secondary School Certificate Examination from a recognized Board.

Note: For the purpose of Promotion, joint seniority list of Qasids, Naib Qasids and Process Servers including holders of other equivalent posts shall be maintained with reference to the date of their matriculation or appointment whichever is later.

(Copy enclosed for facilitation please).

[Signature]
Assistant Secretary (Estt)

[Signature] Affected
[Signature] True Copy

20/1/22

OFFICE OF THE
DEPUTY COMMISSIONER
MOHMAND TRIBAL DISTRICT



0924-290001-2



0924-290075



pamohmand@gmail.com




23

Order:

A Committee of the following composition is hereby constituted to consider the promotion of ministerial staff of District Administration Mohmand against the vacant posts.

- | | |
|--|----------|
| 1. Deputy Commissioner Mohmand Tribal District: | Chairman |
| 2. Additional Deputy Commissioner (G) Mohmand Tribal District: | Member |
| 3. Assistant Commissioner Lower Mohmand: | Member |
| 4. Finance Officer (F&P) Mohmand Tribal District: | Member |
| 5. Representative of Commissioner Peshawar Division, Peshawar: | Member |


Deputy Commissioner
Mohmand Tribal District

CC:

1. Commissioner Peshawar Division, Peshawar
2. All Concerned for information

*Attended for
Copy
[Signature]*



(Mohsin Habib)
Additional Deputy Commissioner (G)
Mohmand Tribal District

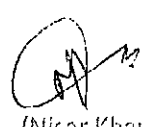


(Qaiser Khan)
Assistant Commissioner
Lower Mohmand

24




(Raam Khan)
Representative of Commissioner
Peshawar Office.



(Nisar Khan)
Finance Officer F&P
Mohmand Tribal District

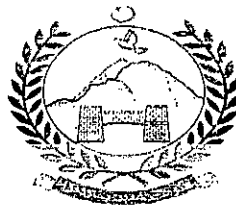


(Ghulam Habib)
Deputy Commissioner
Mohmand Tribal District

Attested
true copy


OFFICE OF THE
DEPUTY COMMISSIONER
MOHMAND TRIBAL DISTRICT

25



0924-290001-2



0924-290075



pamohmand@gmail.com

No. 15771 /Acctt


Dated. 07 December, 2021


Commissioner,
Peshawar Division Peshawar.

DEPARTMENTAL PROMOTION COMMITTEE MEETING.

A meeting of the departmental promotion committee which was held on 02-12-2021 wherein it was decided/agreed upon to convene DPC on basis of all existing vacant posts under the domain of D.C Mohmand). The meeting of Departmental Promotion Committee is re-scheduled to be held in the office of the undersigned at Ghallanai on 25/04/2021 at 11:00 am to consider the promotion cases of ministerial staff.

It is therefore, requested to depute a representative of your good self-office to attend the subject meeting as per scheduled mentioned above please.


Deputy Commissioner
Mohmand Tribal District

Affected
True Copy




**OFFICE OF THE
DEPUTY COMMISSIONER
MOHMAND TRIBAL DISTRICT**

(26)



0924-290001-2



0924-290075



pamohmand@gmail.com

Departmental Promotion Committee Meeting on: 25/01/2022.

Sl. No.	Name of Member	Designation	Signature
	<u>Dr. Mohsin Habib</u>	<u>ADC (G) MTD</u>	
	<u>Qaisar Khan</u>	<u>AC Lower MTD</u>	
	<u>Inam Khan</u>	<u>Rep: of CPDP Office</u>	
	<u>Nisar Khan</u>	<u>F.O F&P MTD</u>	

*Attested
for copy*

for file

WORKING PAPER

PROMOTION ON REGULAR BASIS TO THE POST OF ASSISTANT, SENIOR CLERK, JUNIOR CLERK AND MOHARRIR AND CLASS-IV IN THE OFFICE OF DEPUTY COMMISSIONER MOHMAND TRIBAL DISTRICT.

There are total 08 posts of Assistant out of which 02 posts are filled and 06 posts of Assistant are lying vacant due to fresh SNL of 04 Assistants issued by Revenue & Estate Department vide No.SNE/DCS/2021-22/25745 dated 12.10.2021 and 02 Posts of Assistant are lying vacant in the Finance and Planning Department Mohmand Tribal District.

In terms of S: No. 3 of appendix attached with the Government of NWFP Revenue and Estate Department Notification No. 2074/Estt: 1/11/135 SSR amended dated 23.1.2015 (Annex "A") the method for recruitment has prescribed for filling the post of Assistant as following.

"75 % by promotion on the basis of seniority cum fitness from amongst the senior Clerk with at least five years' service as Junior Clerk and Senior Clerk in the Office of the Deputy Commissioner and Political Agent District Concerned.

In light of the above, 04 Posts of Assistant will be filled through promotion from amongst the Senior most Senior Clerks from the Seniority list duly signed by the Deputy Commissioner Mohmand Tribal District (attached as Annexure "B") and 02 Posts will be filled through direct recruitment whereas 02 posts of Assistants are already filled by promotion.

The 04 top most Senior Clerks as per attached Seniority List have the requisite length of service and fit for promotion to the post of Assistant on the basis of their Seniority/ACRs. The synopsis of their ACRs and certificate regarding non-involvement in cooperation/departmental enquires is attached as Annex "C".

Handed from copy
[Signature]

PROMOTION OF JUNIOR CLERKS AS SENIOR CLERKS.

There are total 08 Number of Posts of Senior Clerks out of which 04 number of Senior Clerk posts will stand vacant due to promotion as Assistant and 01 post of Senior Clerk already remains vacant from the strength of the Finance and Planning Department and these vacated posts will be filled by promoting the Senior most Junior Clerks.

In the terms of S: No. 5 of appendix attached with the Government of NWFP Revenue and Estate Department said Notification (Annex" D) the method of recruitment has been prescribed for filling up the post of Senior Clerks as following.

"By promotion on the basis of seniority cum – fitness form amongst the holders of the post of Junior Clerk having a least three years' service as such"

The Seniority list of Junior Clerk (BPS-11) duly signed by the Deputy Commissioner Mohmand attached as (Annexure-"E").

The Seniority list of Junior Clerks (BPS-11) duly signed by the Deputy Commissioner Mohmand attached as Annexure-"G" and the top most 04 Junior Clerks will be promoted as Senior Clerks. They have the requisite length of service are fit for promotion to the post of Senior Clerks on the basis of their seniority / ACRs. The Synopsis of their ACRs and certificate regarding non-corruption / Departmental inquiries are attached as Annexure "H".

Advice / guidance over the promotion criteria / case of one Junior Clerk employee of Defunct FATA DC was sent to Home & T.As Department .But reply is still pending ,the seat is thus left vacant till receipt of final directions in the instant matter and is therefore, held in abeyance ,till final directions.

PROMOTION OF MOHARRIRS AND CLASS-IV AS JUNIOR CLERK.

There are total 19 Posts of Junior Clerks out of which Nine (9) posts of Junior Clerks are lying vacant due to promotion of 04 Nos Junior Clerks to the post of Senior Clerks and 05 posts of junior clerks are already vacant(02-post in DC Mohmand office and 03 Post of J/Clerks in F&P MTD).

In the terms of S.No.5 of appendix attached with the Government of NWFP Revenue and Estate Department said Notification Estt:1/11/135/SSRC amended dated 25/06/2019 (Annex-"I") the method of recruitment has been prescribed for filling up the post of Junior Clerk as following :-

1. 33 % by promotion on the basis of seniority cum fitness from amongst the Qasids, Naib Qasids and Process Server including holders of other equivalent posts in the District concerned with two year service as such, who have passed Secondary School certificate examination from a recognize Board.
2. 10 % by promotion, on the basis of seniority cum fitness, from amongst the Readers, Moharrir and Record keepers with at least five years service as such.
3. 57 % by initial recruitment from the candidate of the District concerned.

In light of the above 04 post will be filled by promotion from amongst the Readers, Moharrir and Class-IV after fulfillment of all codal formalities. The Departmental Promotion Committee / forum will decide promotion from amongst the Moharrirs and Class-IV. 01 post of junior clerk will be filled by appointing the son of Mr.Zahid Ullah who embraced "Shahadat" during service on 06/12/2010 . The remaining 04 posts of junior clerks will be filled through direct / fresh recruitment. Seniority list of Junior Clerks. Seniority lists of Moharrirs and Class-IV duly signed by Deputy Commissioner Mohmand is attached as (Annexure "J" & "K").

[Signature]
Deputy Commissioner MTD

[Handwritten notes: Mestred, True Copy, Jash]

OFFICE OF THE
ADDITIONAL DEPUTY COMMISSIONER (F&P)
MOHMAND TRIBAL DISTRICT



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0924-290001-2 0924-290075 pamohmand@gmail.com

No. 13557-58 / ACCT-

Dated. 3-12-2021

N

1146

All Ministerial Staff working in Deputy Commissioner,
Finance/Planning Cell,
Tribal District Mohmand

All Technical Staff working in Finance/Planning Cell,
Tribal District Mohmand

Subject:

TENTATIVE SENIORITY LIST OF ASSISTANT, SENIOR CLERK,
COMPUTER OPERATOR, SUB-ENGINEER, JUNIOR CLERKS,
SURVEYOR, TRACER, DRIVER AND CLASS-IV OF THIS OFFICE AS
STOOD ON 03.12.2021.

ioner
above
this

I am directed to refer to the subject noted above and to forward herewith a copy of final seniority list of ASSISTANT, SENIOR CLERK, COMPUTER OPERATOR, SUB-ENGINEER, JUNIOR CLERKS, SURVEYOR, TRACER, DRIVER AND CLASS-IV as it stood on 03.12.2021. The same may be circulated amongst the ministerial staff/Technical staff working in this office.

I am further directed to request you direct all concerned that seniority list may be returned to this office duly signed/included error/omission if any, for purpose of rectification along with attested supporting document up-to 09.12.2021 in case of No receipt of No response by the due date it would be considered that particular have been accepted as correct.

Attested
True Copy

Mwajid
✓ Deputy Commissioner
Mohmand Tribal District
Mohmand Tribal District

MINUTES OF DEPARTMENTAL PROMOTION COMMITTEE MEETING HELD ON 25/01/2022.

Meeting of the Departmental Promotion Committee was held under the Chairmanship of Deputy Commissioner Mohmand Tribal District on 25/01/2022 to consider the promotion existing ministerial staff against the vacant posts as per rules. Additional Deputy Commissioner (G) Mohmand Tribal District, Assistant Commissioner Lower Mohmand, Finance officer F&P and Representative of Commissioner Peshawar Division Peshawar Office attended the Meeting.

Meeting started with the recitation of a few verses from the Holy Quran. Opening discussion the Chairman welcomed the participants and informed them regarding the post cons of the meeting. The Seniority lists, Service Books and other related documents / record of the ministerial staff concerned were thoroughly checked and after detailed discussion the committee unanimously the following decision were taken and recommended ministerial staff for promotion against the vacant posts as per detail below :-

1. FILLING UP OF THE POSTS OF ASSISTANT BPS-16

There are total 08 posts of Assistant out of which 02 posts are filled and 06 posts of Assistant are lying vacant due to fresh SNE of 04 Assistant issued by Revenue & Estate Department vide No. SNE/DCS/2021-22/25745 dated 12.10.2021. 04 posts of Assistant will be filled through promotion and 02 posts will be filled through direct recruitment.

The committee recommended the following official being top in seniority list of Senior Clerks having no adverse ACRs for last three (3) years and also possess the required length of service for promotion of the post of Assistants:-

- 1) Muhammad Sher
- 2) Nisar Ahmad
- 3) Abdul Wakil
- 4) Abdur Rehman

Promotion of Mr. Amjid Ali (Senior Clerk) is differed for the reason of an ongoing enquiry regarding his alleged involvement in corruption/malpractices and also because he has not being issued with No Objection certificate of not being found incorruptible for the period under reference.

*Attended
Javed Gani
[Signature]*

P2 (30)

Date of passing Matric

10	Nasib Khan	Zaitullah Khan	Khakrob (BPS-03)	21407.1229324.9	Nil	01.10.2007	Nil	Mohmand/ III	AC UM office
11	Mohammad Roz	Amroz Khan	Naib Qasid (BPS-03)	21402.1450528.9	Nil	22.12.2008	Nil	Mohmand/ 01.01.1977	DC Office
12	Mohammad Imran	Shah Rom Bacha	Naib Qasid (BPS-03)	21407.7744772.5	SSC	22.12.2008	2020	Mohmand/ 13.03.1999	DC Office
13	Maqsood Khan		Survey Helper BPS 03		FA+DIT	18.05.2009	1990	Mohmand/ 02.02.1974	ADC F&P Office
14	Gul Taj Khan		Survey Helper BPS 03		Middle	18.05.2009		Mohmand/ 01.01.1976	ADC F&P Office
15	Abdullah Khan		Naib Qasid BPS 03		SSC	18.05.2009		Mohmand/ 1979	ADC F&P Office
16	Ibrarullah		Naib Qasid BPS 03		SSC	18.05.2009		Mohmand/ 01.04.1982	ADC F&P Office
17	Khalid Khan	Sadam Khan	Process Server BPS 03	21407.6121896.9	SSC	10.08.2009	2012	Mohmand/ 20.04.1994	AC Lower Office
18	Waheed Gul	Khanzad Gul	Beheshti (BPS-03)	21407.3984748.5	SSC	01.10.2009	1999	Mohmand/ 09.09.1983	AC Lower Office
19	Waqar ul Hasan	Saida Gul	Naib Qasid (BPS-03)	17301.5777460.7	SSC	08.12.2009	1991	Mohmand/ 18.11.1973	DC Office
20	Shahid Khan		Naib Qasid BPS 03		Middle	28.08.2010		Mohmand/ 1980	ADC F&P Office
21	Sardar Gul		Survey Helper BPS 03		SSC	24.08.2010		Mohmand/ 18.08.1987	ADC F&P Office
22	Faroq Khan	Sawab Gul	Naib Qasid (BPS-03)	17101.4004175.9	Nil	01.01.2011	Nil	08.06.1988	AC UM office
23	Hijran	Qandari	Mali (BPS-03)	21402.7969635.1	Nil	01.03.2011	Nil	Mohmand	DC House
24	Javid Khan	Said Karim	Naib Qasid (BPS-03)	21406.0667315.9	Nil	01.06.2011	Nil	Mohmand/ 1992	AC Baizai Office

Mohmand
3-12-21

Dated

AC Date

Attended to be done GPN

DEPUTY COMMISSIONER
MOHMAND TRIBAL DISTRICT

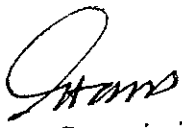
Phone No. 0924-290001 Fax No. 0924-290075 Email: pamohmand@gmail.com

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No. 509-12/Acctt:
Dated 26/01/2022

As recommended by Departmental Promotion Committee in its meeting held at Ghallanai
25/01/2022, the following Class-IV (BPS-04) (9900-440-23100) are hereby promoted to the
of Junior Clerks (BPS-11) (12570-880-38970) with immediate effect in the best interest of
olic:-

3. Mr. Maqsood Khan.
4. Mr. Waqar ul Hassan.


Deputy Commissioner
Mohmand Tribal District

Copy to:-

6. Commissioner Peshawar Division Peshawar.
7. Additional Deputy Commissioners (G/F&P) Mohmand Tribal District.
8. Assistant Commissioners Mohmand Tribal District.
9. District Accounts Officer Mohmand Tribal District.
10. Official concerned.

Attest
True copy
[Signature]