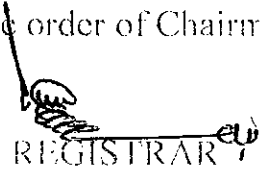


FORM OF ORDER SHEET

Court of _____

Case No. - 711/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/03/2023	<p>The appeal of Mr. Noor Rehman presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 711 /2023

NOOR REHMAN VS PLANNING & DEVELOPMENT DEPTT:

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APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK,
ADVOCATE SUPREME COURT

-1-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 711 /2023

Mr. Noor Rehman, Computer Operator (BPS-12),
Directorate of Projects, Khyber Pakhtunkhwa, Peshawar.

.....APPELLANT

VERSUS

- 1- The Secretary, Planning & Development Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General, Planning & Development Department, Khyber Pakhtunkhwa, Peshawar.

.....RESPONDENTS

**APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED
APPELLATE ORDER DATED 17.01.2023 WHEREBY THE
DEPARTMENTAL APPEAL OF THE APPELLANT FOR FIXATION OF
PAY W.E.F. 03.08.2017 I.E. FROM THE DATE OF INITIAL
APPOINTMENT HAS BEEN REJECTED WITHOUT ANY GOOD
REASON.**

PRAYER:

That on acceptance of this appeal the impugned appellate order dated 17.01.2023 may very kindly be set aside and the appellant may kindly be allowed/granted pay fixation w.e.f. 03.08.2017 i.e. from the date of initial appointment with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the respondent department vide advertisement advertised certain posts and after following the codal formalities the appellant was appointed in the respondent Department as Computer Operator (BPS-12) vide order dated 03.08.2017. Copies of advertisement and appointment order are attached as Annexure..... **A & B.**
- 2- That in response to the order mentioned above the appellant submitted her arrival report and took over the charge of his post. Copy of the charge report is attached as annexure**C.**
- 3- That while performing his duty the service of the appellant was regularized vide notification dated 30.06.2022 in pursuance of K.P (Regularization of Services of employees of Erstwhile FATA) Act, 2021.

Copies of the notification and Act are attached as AnnexureD & E.

- 4- That in pursuance to the notification mentioned above the services of the appellant was regularized and his pay was fixed from the date of notification, feeling aggrieved the appellant along with other preferred departmental appeal/ representation before the respondents, and the same was take-up with the respondent No. 2. Copies of the correspondence are attached as AnnexureF.
- 5- That the representation of the appellant was disposed of/dismissed vide order dated 17.01.2023. Copy of the appellate order dated 17.01.2023 is attached as Annexure G.
- 6- That feeling aggrieved from the appellate order and having no other remedy the appellant filed the instant appeal on following grounds inter alia.

GROUND:

- A- That the inaction of respondents by not allowing pay fixation to the appellant w.e.f. 03.08.2017 is against the law, facts; norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and mala fide manner by not allowing pay fixation to the appellant w.e.f. 03.08.2017 i.e. from the date of appointment and as such the inaction of the respondents is violative of law and rules.
- D- That in such a situations/ similar cases pay protection was granted to the regularize civil servants by the finance department vide notification/ circular dated 18.03.2021. Copy of notification/circular dated 18.03.2021 is attached as Annexure H.
- E- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.
- F- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for the grant of pay fixation w.e.f. 03.08.2017 the date of initial appointment.
- G- That as per rule 2.3. of the West Pakistan Pension Rules, 1963 and FR 22 the appellant is fully entitled for the grant of pay fixation w.e.f. initial appointment with all back benefits.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 15.02.2023


**APPELLANT
NOOR REHMAN**

THOROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**


KAMRAN KHAN


UMAR FAROOQ


WALED ADNAN


**MUHAMMAD AYUB
ADVOCATES HIGH COURT**

AFFIDAVIT

I, Noor Rehman, Computer Operator (BPS-12), Directorate of Projects, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.


DEPONENT

JOB OPPORTUNITIES

A-Directorate of Projects:

FATA Secretariat Warsak Road, Peshawar Invites Applications from suitable candidates having respective domicile of Khyber Pakhtunkhwa / FATA as mentioned for the following vacant positions in Directorate of Projects, Project Management Unit-World Food Program (WFP) Peshawar and Project Management Unit-Mohmand Area Development Project (MADP), on contract basis (fixed pay) as per Govt. of Pakistan (Regulation Wing) Finance Division standard pay package (2009) for the project staff, Initially for a period of one year which is extendable on the satisfactory performance of the appointee till the project life. (Preference will be given to those candidates having FATA domicile).

4-

1) Directorate of Projects FATA

Sr.	Position	No. of Posts	Domicile	Age Limit	Qualification
01	Programme Officer (BPS-17) DoP, FATA Secretariat Fixed Pay Rs.45,000/- P/M	02	KPK/FATA	30-50	Master Degree in Social Sciences/B.Sc in Civil Engineering from HEC recognized university with minimum 05 years of relevant experience in development sector preferably in Govt. Projects of multi sectoral Foreign Aided Projects /Donors assisted projects and computer knowledge (MS Office),
02	Office Assistant (BPS-14), DoP Fixed Pay Rs.15,000/- P/M	01	FATA	18-35	Graduate with 02 years relevant experience in government & semi government organization and having computer knowledge (MS Office)
03	Computer Operator, DoP (BPS-12) Fixed Pay Rs.15,000/- P/M	01	FATA	18-35	BCS/B.Sc. Computer or BA / B.Sc with one year diploma in IT from Board of Technical Education, KPK with 02 years relevant experience in a government or semi government organization.
04	Computer Operator, PMU-WFP (BPS:12) Fixed Pay Rs.15,000/- P/M	01	FATA	18-35	BCS/B.Sc. Computer or BA / B.Sc with one year diploma in IT from Board of Technical Education with 02 years relevant experience in a government or semi government organization.

2) Project Management Unit-Mohmand Agency Based Posts

Sr.	Position	No. of Posts	Domicile	Age Limit	Qualification
01	Monitoring & Evaluation (M&E) Officer (BS-17) PMU-MADP, Ghallanai, Mohmand Agency Fixed Pay Rs.45,000/- P/M	01	KPK/FATA	30-40	<ol style="list-style-type: none"> 1. Master degree in social sciences 2. Must have minimum three years' of experience in project monitoring and evaluation, project development and proposal writing, and implementation of development projects. 3. Should have analytical capacity to design and implement development projects with the interface between government and communities. Excellent computer skills in MS Office particularly in MS Project are a must.
02	Computer Operator (BS-12) PMU-MADP, Ghallanai, Mohmand Agency Fixed Pay Rs.15,000/- P/M	02	FATA	25-40	<ol style="list-style-type: none"> 1. FA/F.Sc with Diploma in Information Technology (DIT) with at least two years' enviable quality experience in the relevant field in an automated office environment. 2. Excellent communication and interpersonal skills

2017/06 8

-5- 'B'

Office Order

Consequent upon the approval of the competent authority, the following candidate has been appointed against the vacant position of Computer Operator (PS-12) at Project Management Unit, World Food Programme, Directorate of Projects, FATA Secretariat as per the interviews conducted by the selection committee on 12th July, 2017. The appointment is purely on contract basis on a fixed pay as per Govt. of Pakistan Finance Division (Regulation Wing) standard pay package O.M No. F.4(9)R-3/2008/592/09 dated: 12th August, 2017 for the project staff. The appointment is initially for the period of one year which is extendable up to the life of the Project on satisfactory performance.

S. No	Name of Appointee	Post	Place of Duty
1	Mr. Noor Rehman S/O Shah Wali Of South Waziristan Agency	Computer Operator (PS-12)	PMU-WFP, FATA

The appointee is directed to report to the Project Director, PMU-World Food, Directorate of Projects, FATA Secretariat within 15 days positively from the date of issuance of office order.

In case of failure, the appointment shall automatically stand cancelled & the post shall be offered to the next candidate on waiting list.

The appointee shall produce a medical fitness certificate from the Authorized Medical Superintendent.

The appointment shall be on purely contract basis and the selected candidate will sign a contract appointment deed with PMU-WFP, FATA.

The appointee shall be considered as project employee and his contract can be terminated at any time without assigning any reason and will have no right of regular status.

Academic certificates/degrees from respective boards/universities shall be verified before signing the contract service agreement.

[Signature]
-Sd-
Director General Projects

Endst: No. FS/DoP/F&A/Recruitment DoP/8649 (8) Dated: 3rd August, 2017

Copy forwarded for information and necessary action to:

1. Addl. Accountant General, Pakistan Revenue, Sub Office, Peshawar
2. Project Director, PMU-World Food Programme, FATA
3. PS to Additional Chief Secretary, FATA
4. PS to Secretary P&D Department, FATA Secretariat
5. PS to Secretary, Finance Department, FATA Secretariat
6. PS to Secretary, AI&C Department, FATA Secretariat
7. PS to Director General Projects, FATA Secretariat
8. Official Concerned

[Signature]
PROJECT DIRECTOR
Project Management Unit
W.F.P. FATA

[Handwritten initials]

ADG _____

D.D. _____

M&E _____

P.O. _____

F&A _____

PS _____

C.No & Date 408/2017

Directorate of Projects

[Signature]
(Shakir Muhammad)
Finance & Admin Officer

Scanned by CamScanner

Scanned with CamScanner

The Project Director,
Project Management Unit, World Food Programme,
Directorate of Projects, FATA Secretariat

"C" -6-

Subject: ARRIVAL REPORT

Sir,

With reference to Directorate of Projects, FATA Secretariat office order No. FS/DoP/F&A/Recruitment DoP/8649 (8) Dated: 3rd August, 2017, I Noor Rehman S/O Shah Wali is hereby submit my arrival report as Computer Operator, PMU-World Food Programme, Directorate of Projects, FATA Secretariat on 07.08.2017 (F.N).



(Noor Rehman)
Computer Operator (PMU-WFP)
DoP, FATA Secretariat

for n/a, pls.

W. 1/17

7/8/17

F&AO:



"D"
-7-

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 9th SEPTEMBER, 2022.

**GOVERNMENT OF KHYBER PAKHTUNKHWA
PLANNING & DEVELOPMENT DEPARTMENT**

NOTIFICATION

Dated Peshawar, the 30th June, 2022.

NO.SO(E)P&D/3-1/Req:/Projects/M.As/2022: In compliance of Section-3 of the Khyber Pakhtunkhwa (Regularization of Services of Employees of Erstwhile Federally Administered Tribal Areas) Act, 2021, the Provincial Government is pleased to notify regularization of services of the following (04) employees of the project titled "Project Management Unit for World Food Programme in FATA" with effect from 13.01.2022, subject to following conditions as provided in Section-4 of the Act ibld:

- the service promotion quota of all service cadres shall not be affected;
- the employees shall possess the same qualification and experience as required for a regular post;
- the employees have not resigned from their services or terminated from service on account of misconduct, inefficiency or any other grounds before the commencement of this Act; and
- the services of such employees shall be deemed to have been regularized only on the publication of their names in the official Gazette.

S#	Name of Officers/Officials	BPS	Designation
1.	Mr. Sajjad Muhammad.	17	Sectors Specialist.
2.	Mr. Qayum Khan.	16	Office Assistant
3.	Mr. Khalid Mahmood.	16	Computer Operator.
4.	Mr. Noor Rahman.	16	Computer Operator.

EXTRAORDINARY
GOVERNMENT



"E" -8-
REGISTERED NO. PIII

GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority.

PESHAWAR, THURSDAY, 13th JANUARY, 2022.

PROVINCIAL ASSEMBLY SECRETARIAT
KHYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar, the 13th January, 2022.

No. PA/Khyber Pakhtunkhwa/Bills-182/2022/745.— The Khyber Pakhtunkhwa (Regularization of Services of Employees of Erstwhile Federally Administered Tribal Areas) Bill, 2021 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 31st December, 2021 and assented to by the Governor of the Khyber Pakhtunkhwa on 07th January, 2022 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

**THE KHYBER PAKHTUNKHWA (REGULARIZATION OF SERVICES OF EMPLOYEES OF ERSTWHILE FEDERALLY ADMINISTERED TRIBAL AREAS) ACT, 2021
(KHYBER PAKHTUNKHWA ACT NO. I OF 2022)**

(First published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa, (Extraordinary), dated the 13th January, 2022).

AN ACT

to provide for the appointment and regularization of services of certain employees appointed on contract basis against project posts in the erstwhile Federally Administered Tribal Areas.

WHEREAS it is expedient to provide for the appointment and regularization of services of certain employees appointed on contract basis against project posts in the erstwhile Federally Administered Tribal Areas:

It is hereby enacted by the Provincial Assembly of Khyber Pakhtunkhwa as follows:

1. Short title, application and commencement.—(1) This Act may be called the Khyber Pakhtunkhwa (Regularization of Services of Employees of Erstwhile Federally Administered Tribal Areas) Act, 2021.

(2) It shall apply to all the employees as defined in clause (d) of sub-section (1) of section 2 of this Act.

(3) It shall come into force at once.

Definitions.--- (1) In this Act, unless the context otherwise requires.

- 9-
- (a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;
 - (b) "Departmental Selection Committee" means a Departmental Selection Committee, constituted for the purpose of making selection for appointment to project post under a Department or office in the erstwhile Federally Administered Tribal Areas;
 - (c) "Government" means the Government of Khyber Pakhtunkhwa;
 - (d) "employees" means a person, who was appointed on contract basis, as per project policy, to a project post, in the erstwhile Federally Administered Tribal Areas, and such post was duly reflected in PC-I of that project, and who possess the prescribed qualification, training and experience for the said post at the time of such appointment;
 - (e) "Department" means a Government Department, as defined in the Khyber Pakhtunkhwa Government Rules of Business, 1985;
 - (f) "law or rules" means the law or rules, for the time being in force, governing the selection and appointment of civil servants;
 - (g) "project" means a perpetual nature project in the erstwhile Federally Administered Tribal Areas, the continuation of which and conversion to regular budget is essential for service delivery, duly identified by the Departments and reflected in the Schedule;
 - (h) "project post" means a post in the project; and
 - (i) "Schedule" means a Schedule appended to this Act.

(2) The expression "contract appointment" shall have the same meaning as respectively assigned to them in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVII of 1973).

3. Appointment and regularization of services of employees.--- (1) Notwithstanding anything contained in any law or rules, the employees, appointed on contract basis, against project posts, in the erstwhile Federally Administered Tribal Areas, and holding such project posts till the commencement of this Act, shall be deemed to have been validly appointed, on regular basis, from the commencement of this Act, subject to verification of their qualifications and other credentials by the concerned Department.

(2) All such employees, after the commencement of this Act, shall, in lieu of pension and gratuity, be entitled to receive such amount contributed by them towards the Contributory Provident Fund, along with the contributions made by Government to their account in the said Fund, in the prescribed manner.

(3) A Committee, headed by the Secretary of the Department concerned, with the following membership, shall scrutinize all the credentials of the employees, before issuance of the regularization orders:

-10-

- (a) head of the Attached Department concerned;
- (b) representative of the Establishment and Administration Department of Government;
- (c) representative of the Finance Department of Government;
- (d) representative of the Planning and Development Department of Government; and
- (e) Deputy Secretary of the Department concerned.

4. **General conditions for regularization.**--- For the purpose of regularization of the employees under this Act, the following general conditions shall be observed:

- (a) the service promotion quota of all service cadres shall not be affected;
- (b) the employees shall possess the same qualification and experience as required for a regular post;
- (c) the employees have not resigned from their services or terminated from service on account of misconduct, inefficiency or any other grounds before the commencement of this Act; and
- (d) the services of such employees shall be deemed to have been regularized only on the publication of their names in the official Gazette.

5. **Determination of seniority.**---(1) All employees, whose services are regularized under this Act, shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission or Departmental Selection Committee, as the case may be, made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

(2) The seniority inter-se of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined as per provisions of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) and rules made thereunder.

6. **Removal of difficulties.**---If any difficulty arises in giving effect to any of the provisions of this Act, the Chief Minister of Khyber Pakhtunkhwa may make such order, not inconsistent with the provisions of this Act, as may appear to him to be necessary for the purpose of removing such difficulty.

7. **Overriding effect.**---Notwithstanding anything to the contrary contained in any other law or rules, the provisions of this Act shall have an overriding effect and the provisions of any such law or rules to the extent of inconsistency to this Act shall cease to have effect.

Schedule
[see section 2 (1) (h) (i)]

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1.	Strengthening and Capacity Building of AGR Extension in FATA.
2.	Promotion of Olive Cultivation / Grafting for Oil Production in Bajaur Agency.
3.	Establishment of Semen Production Unit at Jamrud and Breed/ Veterinary Service Improvement Program.
4.	Capacity Building Directorate of Livestock FATA.
5.	Mobile Veterinary Clinic in FATA (MVC).
6.	Establishment of Model Dairy Farm in FATA.
7.	Strengthening of Artificial Insemination/Veterinary Aid Services and Disease Reporting System I.&DD in FATA.
8.	Creation of Disease Free Zone Through Mass Vaccination and Treatment and Feasible Districts on Pilot Basis.
9.	Opening of 5 CVIDS 5 CVCS 6 AICS and Up-gradation of 2 CVIDS to the level of CVHS Status in Bajaur Agency.
10.	Provision of Medicine and A.I Services in Existing Vet. Institution in Bajaur Agency.
11.	Establishment Vety Diagnostic Lab in CVH Khar and Construction of Garage For 2 Vehicle in A.I.O Office Bajaur Agency.
12.	Provision of A.I. Facilities/Medicine in Existing Veterinary Institution Construction of Building of Functional Veterinary Centers (In Rented Building). Special Campaign for The Control of Ecto and Endo Parasite in Mohmand Agency.
13.	Opening of 3 CVIDS. 23 VCS, 16 AICS and Up-gradation of CVD Lakaro to CVH Status Mohmand Agency.
14.	Provision of Mobile Vety Clinic in Mohmand Agency.
15.	Opening/Establishment of 2 CVIDs in Rented Building Ambar Area and Provision of A.I. Services in Existing Institutes of Mohmand Agency.
16.	Opening of 18 Vety Centers and 26 AICS in Khyber Agency.
17.	Opening of 3 CVIDs in Rented Building, Bara Khyber Agency.
18.	Establishment of 02 Veterinary Diagnostic Lab. in Civil Veterinary Hospitals in Jamrud and Landikotal.
19.	Opening of 3 CVCs, 11 CVIDs and 9 AICS and Up-gradation of 3 CVIDs to CVH Status in Orakzai Agency.
20.	Small Ruminants (Sheep and Goat) Development Program in Tribal Districts.
21.	Provision of Artificial Insemination Services in Existing Veterinary Institution in Orakzai Agency.
22.	Construction of Building for Existing Vety Institution and Provision of Artificial Insemination in Existing Veterinary Facilitation in District Orakzai.
23.	Construction of Building for 3 Rented Veterinary Institutions and Opening of One CVD in Murrezai Area, Orakzai Agency.

24.	Opening of 5 CVCs, 8 CVDs, 22 AICs and Diagnostic Laboratory in Kurram Agency.
25.	Provision of AI Facilities in Existing 11 Veterinary Institutions in NWA.
26.	Provision of Veterinary Health Facilities in District North Waziristan.
27.	Opening of 41 Veterinary Centres, 22 AICs and Up-gradation of one CVD to CVI Status in SWA.
28.	Opening of 07-Veterinary Dispensaries and 10-A.I. Centers in FR Peshawar.
29.	Provision of Mobile Veterinary Clinic in Sub Division Peshawar.
30.	Opening of 02- CVDs and 04-AICs in FR Kohat.
31.	Establishment of Mobile Veterinary Clinic in Sub Division Kohat.
32.	Opening of 2 CVDS, 2 CVCS, 6 AICs and Up-gradation of 1 CVD to CVH Status in FR DIKHAN.
33.	Provision of Mobile Veterinary Clinic in Sub Division D.I. Khan.
34.	Opening of 1 CVH, 02 CVDS, 04 CVCS and 11 AICs in FR Tank.
35.	Up-gradation of CVC to the Level of CVD, and 2 No. of CVD to the Level of CVH in Sub Division Tank.
36.	Opening of 5 Vety. Dispensaries, 05 Civil Vety. Centers, 10-AICs and Up-gradation of 01 CVC to CVD in FR Bannu.
37.	Opening of 08 Veterinary Centres and 08 AICs in FR LAKKI.
38.	Provision of Mobile Veterinary Clinic in Sub Division Lakki.
39.	Uplifting the Socio-Economic Condition and Gender Mainstreaming of Livestock Farmers Through PPP in FATA.
40.	Strengthening of Fisheries Department in FATA
41.	Control of Zoonotic / Contagious Disease Through Existing Vety Health Facilities and Establishment of Two Mobile Testing Labs on Pilots Basis in Tribal Districts.
42.	Provision of Mobile Vety. Clinic in Bajaur Agency.
43.	Provision of Artificial Insemination Services in Existing Function Vety. Institutes and Solarization of Major Vaccine Bank in AD Office in FR D.I. Khan.
44.	Program Management Unit for Roads and Infrastructure.
45.	Strengthening of Finance Department Civil Secretariat FATA.
46.	Aids Control Program in FATA.
47.	Health Sector Reforms Unit FATA.
48.	District Health Information System.
49.	Physical Rehabilitation Centres in FATA.
50.	Hepatitis Control Program in FATA (Phase-III).
51.	Integrated Vector Management Program in FATA.
52.	Eye Care Program in FATA (Phase-III).
53.	Thalassemia Control Program in FATA.
54.	Mobile Hospital Program in FATA (Phase-III).
55.	Establishment of Mental Health Clinics in AEO Hospitals in FATA.

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57.	TB Control Program in FATA.
58.	Maternal, Newborn, Child Health (MNCH) Program Merged District.
59.	Expanded Programme on Immunization (EPI) in FATA.
60.	Strengthening of EPI Program in FATA.
61.	Facilitation of FR Health Sector in FRs (Tank Jandola).
62.	Facilitation of FR Health Setup in FRs (DI Khan Darazinda).
63.	Facilitation of Health Setup in FRs (Bannu Wazir).
64.	Facilitation of Health Setup in FRs (Lakki Bittani).
65.	Facilitation of Health Setup in FRs (Kohat Dara Adam Khel).
66.	Facilitation of Health Setup in FRs (Peshawar Jassan Khel).
67.	Opening of 07 CDs in FR Tank.
68.	Opening of 08 CHCs / CDs in FR D.I Khan District.
69.	Opening of 06 CHCs/CDs in FR Bannu District.
70.	Opening of 08 CHCs / CDs in FR Lakki.
71.	Opening of 02 CDs in FR Kohat District.
72.	Opening of 11 CHCs / CDs in FR Peshawar.
73.	Opening of 41 CHCs / CDs in Mohmand District.
74.	Opening of 22 CHCs / CDs Khyber District.
75.	Opening of 07 CHCs / CDs in Kurram District.
76.	Opening of 15 CHCs/ CDs in Orakzai District.
77.	Opening of 24 CHCs/CDs in North Waziristan District.
78.	Opening of 18 CHCs / CDs in South Waziristan District.
79.	Removal of Staff Deficiencies in Newly opened Areas in Health Facilities FATA.
80.	Establishment of Government College of Management Sciences, SWA.
81.	Strengthening of Crises Management Cell Through FATA Analysis and Strategy Team.
82.	Establishment of Levy Training Center at Shahkass, Jamrud, Khyber Agency.
83.	Establishment of Center of Excellence/Govt. College of Technology, Khar, Bajaur Agency.
84.	Establishment of Vocational Training Centres / Institutes in Bajaur Agency and FR Kohat.
85.	Opening Govt. Polytechnic Institute Parachinar Kurram Agency in rented building.
86.	Establishment of Govt. Technical Institute Wana SWA.
87.	Establishment of Govt. Technical Institute SWA at Chaghmalai.
88.	Introduction of Additional Technologies in Polytechnic Institutes of FATA.
89.	Overcoming of Staff/Equipment Deficiencies in Technical Institutes in FATA.
90.	Operationalization and Provision of Equipment/Machinery to Labs of Existing Technical Institutes in Mohmand Agency GTI Mohmand Agency.
91.	Reformation of Technical Education in all Institutes in FATA.
92.	Introduction of 02 Technologies (Civil & Electrical) at Govt. Tech. Institute Sadda Kurram Agency.

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93.	Introduction of New Technologies in Existing Technical Institutes of Tribal Districts.
94.	FATA Investment Facilitation Agency (PIFA).
95.	Small and Medium Enterprises Facilitation Unit.
96.	Establishment of PMU for Operationalization of Five FM Radio Stations in Merged Areas.
97.	Creation of Project Support Unit For Pre Construction and Implementation of Small Dams/Power Section.
98.	Strengthening of Local Govt. Directorate FATA.
99.	Directorate of Projects FATA Secretariat.
100.	Directorate of Monitoring and Evaluation in FATA Secretariat.
101.	Establishment of E&I Formation for the Directorate of Monitoring and Evaluation in FATA Secretariat.
102.	Satellite Monitoring of Development Schemes in FATA.
103.	Project Management Unit, Fata Infrastructure Programme.
104.	Khyber Area Development Project.
105.	Mohmand Area Development Project.
106.	Bajaur Area Development Project.
107.	Fata Water Resources Development Project.
108.	Survey Feasibilities Under Various Sector Phase-II.
109.	Urban Policy and Planning Unit FATA.
110.	Project Management Unit for World Food Programme in FATA.
111.	Strengthening of P&D Department.
112.	Establishment of IIR/Archival Library in P&DD.
113.	Strengthening of AI&C Department, FATA Secretariat.
114.	Instructional and Physical Training Programme in FATA.
115.	Institutionalization of Boy Scouts Activities in Tribal Districts in FATA.
116.	Strengthening of FATA Olympics Association.
117.	Strengthening of Zakat and Ushr Department, FATA Secretariat.
118.	Strengthening of Minerals Department, PMU for Mineral Sector Projects.
119.	Exploration and Evaluation of Dimension and Decorative Stones in FATA.
120.	Exploration and Evaluation of Occurrences in FATA.
121.	Establishment / Operation of Mines Rescue, Safety and Labour Welfare Centre in FATA.

BY ORDER OF MR. SPEAKER
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(KIFAYAT ULLAH KHAN AFRIDI)

Secretary

Provincial Assembly of Khyber Pakhtunkhwa

"F" -15-

To,

The Secretary to Government of Khyber Pakhtunkhwa
Finance Department, Civil Secretariat, Peshawar

Subject: APPEAL
REGARDING PAY PROTECTION OF PAY OF PROJECT/
CONTRACT EMPLOYEES OF REGULARIZED UNDER THE
"KHYBER PAKHTUNKHWA REGULARIZATION OF SERVICES OF
EMPLOYEES OF ERSTWHILE FATA ACT 2021"

Respect Sir,

It is stated with profound veneration that the Govt. of Khyber Pakhtunkhwa regularized the services of the employees of the Directorate of Projects & PMU-World Food Program erstwhile FATA under the Khyber Pakhtunkhwa (Regularization of Services of Employees of Erstwhile Federally Administered Tribal Areas) Bill, 2021 on 13th January 2022. This act of the Govt. was highly appreciated by the contract employees whose services were regularized thus provided them with job security in future. However, it was noted with concern that their salaries were fixed at the initial stage of the appointment.

In this regard, the P&D Department submitted an appeal of the employees to Finance Department vide letter No. SO (B&A)/P&DD/1-4/SDU/2021-22/100 dated: 22nd December, 2022 (copy enclosed). However, the Finance Department, without properly scrutinize the case, returned the same by quoting the Finance Department Circular No, FD (SR-1)12-7/2014 Dated: 6th February, 2014 and the Finance Department letter No. FD (SOSR-1) 12-2/2020 (34323) dated: 18th March, 2021. It is, however, to be noted that Finance Department letter No. FD (SOSR-1) 12-2/2020 (34323) dated: 18th March, 2021 allow pay protection to gazetted contract employees on their regularization/appointment on regular basis (copy enclosed).

It is pertinent to mention here that the employees of the above mentioned projects had been working in these projects since 2008 and fixing their salaries at the initial pay of their respective grades have resulted in huge reduction in

their salaries without recognizing the services rendered by them in their respective projects. The reduction in salaries coupled with the double digit inflation, has adversely affected the employees and has a far reaching implication upon their living standards

Foregoing in view, it is once again prayed that the pay of the employees of Directorate of Projects & PMU-World Food Program may be protected from their initial date of appointment so as to cope with the prevailing inflation, please.

Yours obediently

All Employees of Directorate of Projects & PMU-World Food Program


(List annexed)

LIST OF EMPLOYEES

-17-

S.No	Name/Designation/Pay Scale of the Project Employee			Date of Appointment	Date of Regularization	Total Service In Project	Signature
	Name of Employee	Designation	Pay Scale				
1	Shakir Muhammad	Admin & Finance Officer	17	17-Mar-09	1/13/2022	13 YEARS	
2	Farzana Yasmeen	Monitoring & Evaluation Officer	17	15-Jun-10	1/13/2022	12 YEARS	
3	Syed Iqbal Hussain Shah	Programme Officer	17	7-Aug-17	1/13/2022	4 YEARS	
4	Hizbullah	Programme Officer	17	11-Jan-11	1/13/2022	11 YEARS	
5	Sajjad Mohammad	Sectors Specialist, WFP	17	25-Jan-15	1/13/2022	7 YEARS	
6	Akhilr Zaman	PA	16	20-Jan-10	1/13/2022	12 YEARS	
7	Muhammad Akbar Khan	PA	16	25-Jan-10	1/13/2022	12 YEARS	
8	Muhammad Sahail	Office Assistant	16	1-Jul-19	1/13/2022	7 YEARS	
9	Gudral Ullah	Office Assistant	16	8-Aug-17	1/13/2022	4 YEARS	
10	Sudhyar Fario	Computer Operator	16	5-Mar-09	1/13/2022	13 YEARS	
11	Syed Wamid Shah	Computer Operator	16	7-Aug-17	1/13/2022	4 YEARS	
12	Qayun Khan	Office Assistant	16	1/7/2015	1/13/2022	7 YEARS	
13	Khalid Mehmood	Computer Operator	16	7/15/2015	1/13/2022	6 YEARS	
14	Noor Rahiman	Computer Operator	16	7/8/2017	1/13/2022	5 YEARS	
15	Shahawaz	Junior Clerk	11	20-Jan-10	1/13/2022	12 YEARS	
16	Iman Khan	Driver	6	21-Jan-09	1/13/2022	13 YEARS	
17	Shakir Ullah	Driver	6	21-Jan-09	1/13/2022	13 YEARS	
18	Muhammad Yousaf	Driver	6	1-Apr-11	1/13/2022	11 YEARS	
19	Adnan	Driver	6	30-Aug-18	1/13/2022	3 YEARS	

20	Sami Ullah	Driver	6	20-Aug-18	1/13/2022	3 YEARS	<i>[Signature]</i>
21	Waheab Gul	Driver	6	27-Aug-18	1/13/2022	3 YEARS	<i>[Signature]</i>
22	Muhammad Farooq Sliah	Office Attendant	3	21-Jan-09	1/13/2022	13 YEARS	<i>[Signature]</i>
23	Sajjad	Office Attendant	3	21-Jan-09	1/13/2022	13 YEARS	<i>[Signature]</i>
24	Rashid Zaman	Office Attendant	3	21-Jan-09	1/13/2022	13 YEARS	<i>[Signature]</i>
25	Yasir Ullah	Office Attendant	3	30-Aug-18	1/13/2022	3 YEARS	<i>[Signature]</i>
26	Fahim Hussain	Office Attendant	3	27-Aug-18	1/13/2022	3 YEARS	<i>[Signature]</i>
27	Muhammad Ishaq	Special Messenger/Watchman	2	21-Jan-09	1/13/2022	13 YEARS	<i>[Signature]</i>
28	Raja	Sweeper	2	4-Feb-10	1/13/2022	12 YEARS	<i>[Signature]</i>

	GOVERNMENT OF KHYBER PAKHTUNKHWA PLANNING & DEVELOPMENT DEPARTMENT
	NO.SO (B&A)/P&DD/1-4/SDU/2021-22/100 Dated Peshawar the 22 nd December, 2022

"B" 17

Sustainable Development Goals
 10/3/22
 Date 22-12-22
 Planning & Development Deptt.
 PESHAWAR

To The Secretary to Govt. of Khyber Pakhtunkhwa
 Finance Department,
 Peshawar.

Subject: - PAY PROTECTION OF PAY OF PROJECT CONTRACT EMPLOYEES
REGULARIZED UNDER THE "KHYBER PAKHTUNKHWA
(REGULARIZATION OF SERVICES OF EMPLOYEES OF ERSTWHILE
FATA) ACT 2021".

Dear Sir,

I am directed to refer to the subject noted above and to say that project employees of the Directorate of Projects & PMU-World Food Program were regularized in wake of the "Khyber-Pakhtunkhwa (Regularization of Services of Employees of Erstwhile FATA) Act 2021" copy of the departmental Regularization Orders enclosed. The respective employees have lodged a joint appeal to the worthy Secretary P&D for grant of pay protection claiming pay protection in the light of the Finance Division Office Memorandum dated 20.09.2016 and Finance Department Notification dated 18.03.2021 (copies enclosed).

Foregoing in view a copy of the said appeal along with all supporting documents, submitted for favour of grant of concurrence to Pay Protection in the light of the above-cited notifications, please.

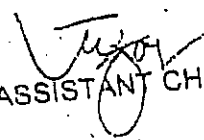
Yours Faithfully

Encl: As above.

(JAWAD KHAN)
 ASSISTANT CHIEF (B&A)

Copy forwarded for information to:

1. The Secretary, P&D Department.
2. The Director General, SDU, P&D Department.
3. The Additional Secretary-II, P&D Department.
4. Deputy Secretary (Admn), P&D Department.


 ASSISTANT CHIEF (B&A)



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

- 20 -

~~12~~

Finance Department Civil Secretariat Peshawar

<http://www.finance.gkp.pk>

[facebook.com/GoKPPD](https://www.facebook.com/GoKPPD)

twitter.com/GoKPPD

NO. FD(SOSR-1)12-4/2022/ERSTWHILE FATA

Dated Peshawar the: 09-01-2023

To

The Section Officer (B&A),
Planning & Development Department,
Peshawar.

Subject: - PAY PROTECTION OF PROJECT CONTRACT EMPLOYEES REGULARIZED UNDER THE "KHYBER PAKHTUNKHWA (REGULARIZATION OF SERVICES OF EMPLOYEES OF ERSTWHILE FATA) ACT 2021".

I am directed to refer to your letter No.SO(B&A)/P&DD/1-4/SDU/2021-22/100 dated 22.12.2022 on the subject noted above and to advise that the case may be examined in light of Finance Department's circular letters No. FD(SR-1)12-7/2014 dated 06.02.2014, FD(SOSR-1)12-2/2020(34323) dated 18.03.2021 and minutes of the meeting held on 21.01.2020 (copies enclosed) which are crystal clear, please.

Encl:A.A

[Signature]
SECTION OFFICER (SR-1)

-21-

"6"

12-



GOVERNMENT OF KHYBER PAKHTUNKHWA
PLANNING & DEVELOPMENT DEPARTMENT

NO.SO (B&A)/P&DD/1-4/SDU/2021-22/100
Dated Peshawar the 17th January, 2023

Sustainable Development Unit
Date: 7-1-23
Planning & Development Deptt.

To
The Director General, SDU
P&D Department.

Subject: - PAY PROTECTION OF PAY OF PROJECT/CONTRACT EMPLOYEES
REGULARIZED UNDER THE "KHYBER PAKHTUNKHWA
(REGULARIZATION OF SERVICES OF EMPLOYEES OF ERSTWHILE
FATA) ACT 2021"

Dear Sir,
I am directed to refer to a joint appeal submitted by all Employees of Directorate of Projects (DOP) & PMU-World Food Program (WFP) for grant of pay protection dated 07.11.2022 and to enclose herewith a copy of Finance Department letter No.FD(SOSR-1)12-4/2022/ERSTWHILE FATA dated 09.01.2023 along with enclosures, wherein Finance Department has tendered that "all project employees who were appointed on fixed pay basis and in receipt of 5% increment are not entitled to the pay protection", please.

Encl: As above.

Yours Faithfully

(JAWAD KHAN)
ASSISTANT CHIEF (B&A)

- Copy forwarded for information to:
1. The Additional Secretary-II, P&D Department.
 2. The Deputy Secretary (Admn), P&D Department.
 3. P.S to Secretary, P&D Department.

ASSISTANT CHIEF (B&A)

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

"H" -22-

Finance Department Civil Secretariat Peshawar

<http://www.finance.gkp.pk>

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[twitter.com/GoKPPD](https://www.twitter.com/GoKPPD)

NO. FD (SOSR-1) 12-2/2020(34323)
Dated Peshawar the: 18th March, 2021

To:

1. The Addl. Chief Secretary, P&D Department, Khyber Pakhtunkhwa.
2. The Addl. Chief Secretary, Merged Areas Sectt: Khyber Pakhtunkhwa.
3. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
4. All Administrative Secretaries to Govt: of Khyber Pakhtunkhwa.
5. The Principle Secretary to Governor, Khyber Pakhtunkhwa.
6. The Principle Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. The Registrar, Peshawar High Court, Peshawar.
10. All District & Sessions Judges in Khyber Pakhtunkhwa.
11. The Chairman, Public Service Commission, Khyber Pakhtunkhwa.
12. The Chairman, Services Tribunal, Khyber Pakhtunkhwa.
13. All Deputy Commissioners, in Khyber Pakhtunkhwa.

Subject:

PROTECTION OF PAY OF CONTRACT EMPLOYEES ON
REGULARIZATION / APPOINTMENT ON REGULAR
BASIS.


Dear Sir,

In pursuance to the Finance Division's Office Memorandum No.4(2)R-2/2014-237 dated 7th April, 2015, the Competent Authority (Provincial Cabinet) is pleased to allow the pay protection to gazetted contract employees on their regularization / appointment on regular basis subject to the following conditions:-

- i) That the contract appointment has been made in BPS on standard terms and conditions, circulated by this Provincial Government as amended from time to time.
- ii) That the contract employee has applied through proper channel and has been properly relieved by the appointing authority. This condition shall not apply in case of regularization on the same post.
- iii) That regularization / regular appointment has been made with the approval of competent authority.
- iv) That there is no break / interruption between contract service and regular service.

- vii) That the pay protection / fixation of pay will be admissible with immediate effect with regard to old / new cases which are fulfilling the pay protection criteria mentioned above.


2. In addition to the above, the Accountant General Khyber Pakhtunkhwa may make fixation of pay in terms of above guidelines and only those cases may please be referred to Finance Department where some clarification or advice is required.

Yours faithfully,

 (Muhammad Salim Shah)
 Deputy Secretary (Reg-I & II)

Endst: No & Date even.

A Copy for information & necessary action is forwarded to the:-

1. Secretaries to Government of Punjab, Sindh, Balochistan, Finance Departments.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. All Heads of Autonomous / Semi Autonomous Bodies in Khyber Pakhtunkhwa.
4. The Director, Treasuries & Accounts, Khyber Pakhtunkhwa.
5. All the District Comptroller of Accounts in Khyber Pakhtunkhwa.
6. The Director, Local Fund Audit, Khyber Pakhtunkhwa, Peshawar.
7. The Director, FMIU, Finance Deptt: with the request to upload the same on FD's Website.
8. The Manager, Govt. Printing Press, Printing & Press Department, Peshawar.
9. All the District Accounts Officers in Khyber Pakhtunkhwa.
10. The Section Officer (Cabinet) Estt: Deptt:, Khyber Pakhtunkhwa with reference to his letter No.SOC(E&A)9-51/2021 dated 08-03-2021.
11. The Section Officer (Estab), C&W Deptt: with reference to his letter No.SOC/CSWD/1-61/2010 dated 26-10-2020 in respect of Eng. Syed Hasir Jahan, Asstt: Engineer / SDO (BS-17) of C&W Deptt: KP.
12. The Private Secretary to Chief Secretary, Khyber Pakhtunkhwa.
13. The Private Secretary to Minister for Finance, Khyber Pakhtunkhwa.
14. The Private Secretary to Secretary, Finance Deptt: Khyber Pakhtunkhwa.
15. PA to Special Secretary, Finance Department, Khyber Pakhtunkhwa.
16. PAs to Additional Secretaries / Deputy Secretaries in Finance Department, Peshawar.


 (REHMAT KHAN)
 SECTION OFFICER (SR-1)

- vi) That in case of regular appointment in lower grade, pay shall not be protected.
- vii) That the pay protection / fixation of pay will be admissible with immediate effect with regard to old new cases which are fulfilling the pay protection criteria mentioned above.

2 In addition to the above, the Accountant General Khyber Pakhtunkhwa may make fixation of pay in terms of above guidelines and only those cases may please be referred to Finance Department where some clarification or advice is required.

Yours faithfully,
Sd/-
(Muhammad Salim Shah)
Deputy Secretary (Reg-I & II)

Endst: No & Date even.

A Copy for information & necessary action is forwarded to the:-

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5. All the District Comptroller of Accounts in Khyber Pakhtunkhwa.
6. The Director, Local Fund Audit, Khyber Pakhtunkhwa, Peshawar.
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11. The Section Officer (Estab), C&W Deptt: with reference to his letter No SOE/C&WD/1-61/2010 dated 26-10-2020 In respect of Eng. Syed Nasir Johan, Assst: Engineer / SDO (BS-17) of C&W Deptt. KP.
12. The Private Secretary to Chief Secretary, Khyber Pakhtunkhwa
13. The Private Secretary to Minister for Finance, Khyber Pakhtunkhwa
14. The Private Secretary to Secretary, Finance Deptt. Khyber Pakhtunkhwa,
15. PA to Special Secretary, Finance Department, Khyber Pakhtunkhwa,
16. PAs to Additional Secretaries / Deputy Secretaries in Finance Department, Peshawar.

Sd/-
(Rehmat Khan)
SECTION OFFICER. (SR-I)

Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar
Monthly Salary Statement (December-2022)



Personal Information of Mr NOOR REHMAN d/w/s of SHAH WALI
Personnel Number: 50353179 CNIC: 1210183143843
Date of Birth: 04.04.1987 Entry into Govt. Service: 07.08.2017

NTN:
Length of Service: 05 Years 04 Months 026 Days

Employment Category: Active Temporary

Designation: COMPUTER OPERATOR

81200924-GOVERNMENT OF KHYBER PAKH

DDO Code: PR8235-PMU World Food Programme in FATA (Reg Act Ex FATA) Peshawar

Payroll Section: 009

GPF Section: 002

Cash Center:

GPF A/C No:

GPF Interest Free

GPF Balance:

10,020.00 (provisional)

Vendor Number: 30408534 - NOOR REHMAN 0001031033 URL

Pay and Allowances:

Pay scale: DPS For - 2022

Pay Scale Type: Civil BPS: 16

Pay Stage: 1

Wage type		Amount	Wage type		Amount
0001	Basic Pay	30,330.00	1004	House Rent Allow 45% KP21	9,024.00
1210	Convey Allowance 2005	5,000.00	1500	Computer Allowance	1,500.00
1974	Medical Allowance 2011	1,500.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	2,836.00	2347	Adhoc Rel Al (5% 22(PS17)	2,836.00

Deductions - General

Wage type		Amount	Wage type		Amount
3501	Benevolent Fund	-1,500.00	3609	Income Tax	-118.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax
Payable: 887.78 Recovered till DEC-2022: 190.00 Exempted: 0.04- Recoverable: 707.82

Gross Pay (Rs.): 56,526.00 Deductions: (Rs.): -2,268.00 Net Pay: (Rs.): 54,258.00

Payee Name: NOOR REHMAN
Account Number: 0001031033
Bank Details: UNITED BANK LIMITED, 210087 JAM ROAD JAM ROAD,

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: PESHAWAR
Temp. Address:
City:

Domicile: -

Email: noorhm4567@gmail.com

Housing Status: No Official

System generated document in accordance with APPM 4.6.12.9(8288/24.12.2022/v3.0)
* All amounts are in Pak Rupees
* Errors & omissions excepted (SERVICES/31.12.2022/07:33:50)

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 2023

Noor Rehman

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

P & D Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Appellant

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 15 / 2 / 2023



CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

(BC-10-0853)

(15401-0705985-5)


KAMRAN KHAN


UMAR FAROOQ MOHMAND


WALEED ADNAN

&


**MUHAMMAD AYUB
ADVOCATES**

OFFICE:

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