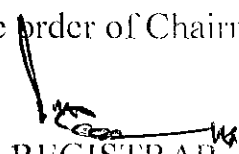


FORM OF ORDER SHEET

Court of _____

Case No.- 751 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/04/2023	<p>The appeal of Mr. Ayub Zarin presented today by Mr. Rahim Ullah Chitrali Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on</p> <p>By the order of Chairman.</p>  <p>REGISTRAR</p>

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

Appeal No 757 -M of 2023

Ayub Zarin (Appellant)

VERSUS

^{Secretary} Higher Education & others (Respondents)

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5.	Copy of notification dated 14.06.2022	B	22
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10	Wakalatnama		37

Appellants
Through Counsel

RAHIMULLAH CHITRALI
& **MAQBOOL ZARIN**
Advocates, High Court

3rd Floor, Continental Plaza Makan Bagh Swat
Cell No. 03439540004 &

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

APPEAL NO: 251 /2023

Ayub Zarin (Ex-Professor GDC; Chitral Lower) S/o Habib Ullah Khan R/o Village Jughoor Rizandeh, Tehsil Chitral District Lower Chitral.

..... Appellant

VERSUS

1. Secretary Higher Education, Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa, Rano Ghari, Peshawar.
3. Principal Government Degree College Chitral Lower.
4. District Accounts Officer Chitral Lower at Chitral
5. Accountant General Khyber Pakhtunkhwa, 2-Fort Road, Peshawar Cantt, Peshawar

..... Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974, AGAINST THE LETTER BEARING NO: SO(C-1)HED/1-9/PP/Ayub Zarin (Prof: Political Science)6519-22 DATED 31-10-2022 ISSUED BY THE OFFICE OF RESSPONDENT NO: 1, WHEREBY THE DEPARTMENT HAS ORDERED FOR RECOVERY OF OVERPAYMENT FROM THE APPELLANT AND ORDER DATED 13-03-2023 PASSED BY THE RESPONDENT NO: 1 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS NOT CONSIDERED AND WHICH WAS COMMUNICATED TO THE APPELLANT ON 14-03-2023 THROUGH WHATSAPP.

Respectfully Sheweth:

The facts of the instant Appeal are as under:-

- 1) **That** the appellant was appointed as Lecturer Political Science BPS-17 vide order dated 08-12-1988 against the vacant post in the Higher Department, Khyber Pakhtunkhwa the then NWFP and later on which was regularized on 14-06-1990.

(Copies of regularization order dated 14-06-1990 and other relevant documents are attached as Annexure-"A" & "A-1")

- 2) **That** from the date of appointment, the appellant was performing his duties to the entire satisfaction of his superior and there was not a single complaint against the appellant in his whole career.
- 3) **That** due to the unblemished service record of the appellant, it is clear that the appellant was regularly performing his duties and as such he was promoted to BPS-18, BPS-19 & BPS-20 respectively with monetary benefits/perks & privileges.
- 4) **That** the appellant retired from the service at the age of superannuation (60 years) on 09-05-2022. *(Copy of the retirement notification dated 14-06-2022 is attached herewith as mark-"B")*
- 5) **That** after retirement the appellant waited and approached to the concern department for the release of his pension etc. Surprisingly the present appellant on 16-11-2022 came to know that letter bearing No: SO(C-1)HED/1-9/PP/Ayub Zarin (Prof: Political Science)6519-22 dated 31-10-2022 issued by Higher Education, Archives & Libraries Department has ordered for recovery of overpayment shown in the Pay & Allowances w.e.f 01-12-2013 to 31-05-2022 and Leave encashment in lieu of LPR, which may be recovered from his commutation amounting Rs: 625,395/- which is at all incorrect and based on illegal presumptions. According to law the appellant is entitled for the payment of Rs: 4,809,652.83/- under Pension Commutation amount while he has been paid a sum of Rs: 4,645,609/- deducting Rs: 164,043/-. Similarly a sum of Rs: 127,720/- has been fixed/mentioned/calculated in connection with determination of the basic pay of BPS-20 instead of Rs: 132,230/- due to which monthly pension was fixed Rs: 150,681/- instead of 156,000/- and a deduction of Rs: 5319/- per month less calculated for the payment of monthly pension, which are tabulated as under:

S. No:			
1.	Actual Amount Rs: 4,809,652.83/-	Amount Received Rs: 4,645,609/-	Deducted Amount Rs: 164,043/-
2.	Basic Pay Rs: 132,230/-	Amount Calculated by Deptt: Rs: 127,720/-	Difference Rs: 4510/-
3.	Actual Monthly Pension Rs: 156,000/-	Pension paid by the Deptt: Rs: 150,681/-	Difference per Month Rs: 5319/-

(Copies of the letter dated 31-10-2022 & other relevant documents are attached herewith as mark-"C")

- 6) **That** the appellant filed departmental appeal before the Respondent No: 1, but the said appeal was not considered vide order dated 13-03-2023 without giving a proper opportunity of hearing, hence the appellant/petitioner was condemned unheard. (*Copies of departmental appeal & order dated 13-03-2023 are attached as Annexure-“D” & “E”*)
- 7) **That** the appellant has no other proper remedy, except to file the instant appeal before this Hon'ble Tribunal, on the following grounds:

GROUND:

- A. That the action of respondent department are unlawful, against the law, arbitrary, discriminatory and against the norms of justice.
- B. That the appellant was performing his duties as Professor very honestly, sincerely & devotedly till 09-05-2022 despite the knowledge of the facts to the respondents, furthermore demand from the appellant is against law, Shariah & rules.
- C. That the salary and other emoluments were used to receive from the Accountant General Office after their proper scrutiny and passing the same by their internal Audit mechanism, pay fixation committee and college Principal/DDO and Accounts Clerk which was never objected or questioned at the relevant time/period.
- D. That the appellant was declared entitled for the said allowances, other perks & privileges and thus was correctly paid accordingly since 11-06-2013, hence this objection can neither be made or questioned at this belated stage after 10 years.
- E. That no show cause notice was served upon the appellant before passing the impugned order and the same was issued at the back of the appellant, hence the said order is illegal, of no legal effect, void and liable to be cancelled/struck down.
- F. That the sheer abuse of the powers and consequent harassment of the appellant at the hand of the respondents department is gross violation of the fundamental rights of the appellant.
- G. That in light of the judgments of the Superior Courts of the country, once a benefit accrued to the appellant cannot be taken back.
- H. That recovery of the said amount is the violation of the Fundamental Rights of appellant as well as prevailing law on the subject.
- I. That it is a settled law that no one should be condemned unheard and in the present case the appellant has not been given opportunity of being heard, hence the impugned order dated 31-10-2022 & 09-02-2023 are liable to be struck down.

- J) That the respondents had not provided opportunity of hearing to the appellant, while deciding the matter hence, violated the principle of natural justice whereby the appellant may not be deprived to defense a case against it and impugned order in violation of right to a fair trial as envisage and granted under 10-A of the Constitution of Pakistan.
- K) That the impugned orders passed by the Respondents are against the law and facts of the case, furthermore the impugned orders of the respondents is against the law and without authority.
- L) That the appellant have been condemned unheard throughout the impugned proceedings/order, as the impugned orders were made unilaterally and without any notice being served on the appellant.
- M) That the impugned orders passed by the Respondents in hasty and slip shod manner and without going into merits of the case.
- N) That the respondents while passing the impugned orders did not considered the legal status of appellant, and passed the impugned order in mechanical manner, violating all the norms of justice and law.
- O) That the vested rights of the appellant as guaranteed and enshrined in the Constitutional of Pakistan have been violated while recovering the amount after retirement.

- P) That no reason for the alleged recovery was ever mentioned in the said order/letter.
- Q) That impugned letter and order of recovery is based on surmises, conjectures and beyond the limitation.
- R) That said disbursement was regularly made to appellant during Service period after proper Audit by the Account Office as well college and as such same recovery cannot be ordered/made at the belated stage of retirement.
- S) That appellant has already done/worked/performed duties against the receipt of said payment which cannot be taken back.
- T) That awarding of financial benefits to the appellant is the exclusive prerogative to the appellant, and the present appellant was not at fault, thus the appellant cannot be punished for the same.
- U) That Supreme Court has time and again held that Pension benefits be released to the Retired Employee within a month but the same was not only been delayed but deducted which too is illegal and same amounts to violation of law and judgments of the Apex Court of the country.
- V) That further grounds, with leave of this Honorable Court, would be raised at the time of arguments before this Honorable Court.

PRAYER

It is therefore humbly prayed that on acceptance of this appeal, to issue directions to the respondent department.

- i) The impugned letter bearing No. SO(C-1) HED/1-9/6519-22 dated 31-10-2022 of the respondent No. 1 and order of the rejection of the department appeal vide letter dated 09-02-2023, may kindly be declared as illegal, without lawful authority, void ab-initio, null & void and no legal effect and to be set aside.
- ii) That the respondents further be directed, to refund / repay all amount to the appellant, which the respondents have deducted as over payment from the appellant.
- iii) To direct the respondent department ^{of Appellant (BS-20)} to issue correct pension and already deducted amount may kindly be released / adjusted and pension amount which is still outstanding may kindly be released.
- iv) Any other relief which this Honorable Court deems fit and proper in the circumstances may also be very kindly granted.

Appellant

Through Counsel
 RAHIMULLAH CHITRALI
 & MAQBOOL ZARIN
 Advocates, High Court

CERTIFICATE:

(As per directions of my client) No such like Appeal earlier has been filed by the appellants on the subject matter before this Honorable Court.

ADVOCATE

BEFORE SERVICE TRIBUNAL AT PESHAWAR

APPEAL

AYUB Zarin

.....Petitioner

VERSUS

Secretary Higher

& OTHERS

.....RESPONDENTS

AFFIDAVIT

I, **Ayub zarin** S/O **Habib Ullah Khan** resident of village **jughoor** Tehsil and District chitral Lower do here by solemnly affirm and declare that the contents of the **Accompanying Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

DEPONANT

Ayub Zarin

CNIC No. 15201-0585031-5

Mob NO: 03449702735

[Handwritten signature]
[Handwritten signature]
3-4-22

Identified by:

[Handwritten signature]

Rahim Ullah Chitrali

Advocate



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

Appeal No _____ -M of 2023

Ayub Zarin (Appellant)

VERSUS

Secretary Higher Education & others (Respondents)

ADDRESSES OF THE PARTIES

APPELLANT

Ayub Zarin (Ex-Professor GDC, Chitral Lower) son of Habib
Ullah Khan resident of Village Jughoor Rizan Deh Tehsil
Chitral District Lower Chitral

RESPONDENTS

1. Secretary Higher Education Khyber Pakhtunkhwa at Peshawar.
2. Director Higher Education Khyber Pakhtunkhwa at Peshawar.
3. Principal Govt. Degree College Chitral Lower.
4. District Accounts Officer Chitral Lower at Chitral.
5. Accounts General Khyber Pakhtunkhwa at Peshawar

Appellants
Through Counsel

RAHIMULLAH CHITRALI
& MAQBOOL ZARIN *m. Zahir*
Advocates, High Court

3rd Floor, Continental Plaza Makan Bagh Swat
Cell No. 03439540004 &

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

Appeal No _____ of 2023

Ayub Zarin (Appellant)

VERSUS

Secretary Higher Education & others (Respondents)


APPLICATION FOR SUSPENSION OF THE IMPUGNED
OFFICE ORDER AND TAKING ANY ACTION ON THE
BASIS OF THE IMPUGNED OFFICE ORDERS IN THE
SHAPE OF RECOVERY ETC. TILL THE FINAL
DISPOSAL OF THE INSTANT SERVICE APPEAL.

Respectfully Sheweth:-

1. That the appellant / applicant being filed the instant service appeal in this Honorable court, where in no date is fixed so far.
2. That the appellant / applicant has a prima facie case and hopeful about the successes of the instant appeal.
3. That the balance of conveyance lies in favor of appellant / applicant as the impugned order is patently illegal passed lack backing of law and are not sustainable.
4. That if the impugned office order has not been suspended the appellant would suffer irreparable loss.

It is, therefore, humbly prayed, that on acceptance this application the impugned office orders in the shape of recovery etc be suspended and further the respondents be refrained from further deduction from the Appellant till the final disposal of the instant service appeal.

Appellant through
Through


RAHIMULLAH CHITRALI
 & MAQBOOL ZARIN
 Advocates, High Court



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

Appeal No. _____ of 2023.

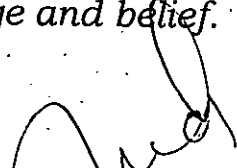
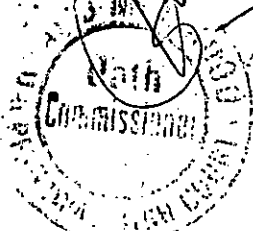
AyubZarin (Appellant)

VERSUS

Secretary
Ministry of Higher Education & others (Respondents)

AFFIDAVIT

I, AyubZarin (appellant), do hereby solemnly affirm and declare on oath that the contents of the accompany application is true and correct to the best of my knowledge and belief.


Deponent

3-11-23


Dated Peshawar the 14/6/1990.

NOTIFICATION

NO.S.O.(COLLEGES)I-6/90:- In pursuance of the provisions contained in Section 3 of the NWFP Employees on Contract Basis(Regulation of Services) Act, 1989(NWFP Act No.VIII of 1989), read with Section-4 of the NWFP Employees on Contract Basis(Regulation of Services) (Amendment) Act 1990, the Government of NWFP is pleased to regularize the services of the following contract appointees(later on called adhoc appointees) as officiating lecturers in BS-17 with effect from the dates of their taking over charge mentioned against each:-

S.No.	Name and designation	Date of regularization
1.	2.	3.
1.	Mst.Kalsoom Bibi, lecturer in Chemistry, Govt. Girls College, Mardan.	30.1.1988.
2.	Mst.Jamila Abida lect:in English, GFC(W), Peshawar.	8.6.1988.
3.	Mst.Naheed Rahman, lect:in Urdu, GGC, Abbottabad.	9.6.1988.
4.	Mst.Naseem Jabbar, lect:in Pol: Sc:GGC, Mardan.	3.11.1988.
5.	Kishwar Sultana, lect:in Maths, GGC, Thana.	5.11.1988.
6.	Mst.Ajmal Khatoon, lect:in Chemistry, GGC, Haripur.	7.12.1988.
7.	Mst.Fawad Nashin Begum, lect:in Pysy. GFC(W), Pshr.	7.12.1988.
8.	Mst.Saira Khatoon, lect:in Urdu, GGC, Mansehra.	7.12.1988.
9.	Mst.Bus Jehan, lect:in Economics, GGC, S/Sharif(Swat).	7.12.1988.
10.	Mst.Tahira Sagheer Dar, lect:in Urdu, GGC, Nowshera.	7.12.1988.
11.	Mst.S.Amina Bibi, lect:in English, GGC, Charsadda.	7.12.1988.
12.	Mst.Rahila Anjum, lect:in Psychology, GGC, Charsadda.	7.12.1988.
13.	Mst.Wiqarun Nisa Begum, lect:in Eco:GGC, Mardan.	7.12.1988.
14.	Mst.S.Neelo far Jabeen, lect:in Islamiat, GGC, A/Abad.	8.12.1988.
15.	Mst.Musarrat Shaheen, lect:in Stats:GGC, Haripur.	8.12.1988.
16.	Mst.Nighat Fatima, lect:in Statistics, GGC, Mansehra.	8.12.1988.
17.	Mst.Shaheen Zaman, lect:in Urdu, GGC, Haripur.	8.12.1988.
18.	Mst.Razia Sultana Lodhi, lect:in History, GGC, Haripur.	8.12.1988.
19.	Mst.Sumera Riffat, lect:in Statist GGC, A/Abad.	8.12.1988.
20.	Mst.Zill-e-Huma, lect:in History, GGC, Mardan.	8.12.1988.
21.	Mst.Sarah Jabbar, lect:in Physics, GGC, D.I.Khan.	8.12.1988.
22.	Mst.Fazeelat Maab, lect:in Isl/Arb: GGC, Charsadda.	10.12.1988.
23.	Mst.Tahira Begum, lect:in Pol: Sc: GGC, Haripur.	10.12.1988.
24.	Mst.Samina Mehtab, lect:in Economics, GGC, Nowshera.	10.12.1988.
25.	Mst.Parzana Shaheen, lect:in Urdu, GGC, Mardan.	11.12.1988.
26.	Mst.Nargis Ara, lect:in Chemistry, GGC, Abbottabad.	14.12.1988.
27.	Mst.Siddiqa Bashir, lect:in Urdu, GGC, Nowshera.	21.12.1988.
28.	Mst.Samina Parveen, lect:in Urdu, GGC Mardan.	21.12.1988.
29.	Mst.Neelo far Chand, lect:in Pashto, GGC, Mardan.	22.12.1988.

Cont... page... 2...



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1	2	3
30.	Mst. Kani z Rabia Sethi, lect: in Maths, GGC, Kohat.	22. 12. 1988.
31.	Mst. Rukhsana Yasmin, lect: in Psychology, GGC, Kohat.	22. 12. 1988.
32.	Mst. Farkhanda Batool, lect: in Islamiyat, GGC, Mardan.	3. 4. 1989.
33.	Mst. Almas Begum, lect: in History, GGC, Haripur.	6. 4. 1989.
34.	Mst. Safia Gul, lect: in Economics, GGC, Haripur.	6. 4. 1989.
35.	Mst. Mumtaz Taj, lect: in Chemistry, GGC, Maneri (Swabi).	15. 4. 1989.
36.	Mst. Khair Bano, lect: in Urdu, GGC, Mardan.	20. 4. 1989.
37.	Mst. Kausar Shaheen, lect: in Islamiyat, GGC, Haripur.	25. 4. 1989.
38.	Mst. Afshan Tabassum, lect: in History, GGC, Nowshera.	23. 5. 1989.

MALE

39.	Mr. I sa Khan, lecturer in Zoology, G.C. Khairabad.	18. 2. 1988.
40.	Mr. Amanullah Khan, lect: in Hist/Civ, GC, Ghazi.	1. 3. 1988.
41.	Mr. Ahmad Jan, lect: in Zoology, G.C. Chitral.	21. 3. 1988.
42.	Mr. Naeemullah, lect: in Physics, GC, Abrokhittak.	8. 6. 1988.
43.	Mr. Shad Ali Khan, lect: in Urdu, GC, Daggar.	9. 6. 1988.
44.	Mr. Mohammad Khurshid, lect: in Botany, GC, Daggar.	9. 6. 1988.
45.	Mr. M. Asif Shah Bukhari, lect: in Zoology, GC, Swabi.	9. 6. 1988.
46.	Mr. M. Iqbal Wazir, lect: in Pak Stud, GC, Ladha.	9. 6. 1988.
47.	Mr. Sartaj Khan, lect: in Law, GC, D.I. Khan.	9. 6. 1988.
48.	Mr. Razauallah, lect: in Chemistry, GC, Daggar.	9. 6. 1988.
49.	Mr. Mohammad Asif, lect: in Economics, GC, Agra.	9. 6. 1988.
50.	Mr. Badat Saman, lect: in Pak Stud, GC, Sadda.	9. 6. 1988.
51.	Mr. Mohammad Basir Khan, lect: in Maths, GC, Karak.	9. 6. 1988.
52.	Mr. Damsaz Khan, lect: in Chemistry, GC, Chitral.	9. 6. 1988.
53.	Mr. Mohammad Jehan, lect: in Economics, GC, Daggar.	9. 6. 1988.
54.	Mr. Mohammad Sadiq, lect: in Physics, GSSC, Peshawar.	9. 6. 1988.
55.	Mr. Khub Nawaz, lect: in Zoology, GC, Parachinar.	12. 6. 1988.
56.	Mr. Nawab Khan, lect: in Law, GC, Chitral.	13. 6. 1988.
57.	Mr. Mohammad Usman, lect: in Urdu, GC, Barra Adam Khel.	14. 6. 1988.
58.	Mr. Khadim Mohammad, lect: in Statistics, GC, Chitral.	29. 6. 1988.
59.	Mr. Mohammad Baqar, lect: in English, GC, Haripur.	2. 11. 1988.
60.	Mr. Abdul Hadi, lect: in English, GJC, S/Sharif (Swat).	2. 11. 1988.
61.	Mr. Mushtaq Ali Shah, lect: in Chemistry, GSSC, Peshawar.	2. 11. 1988.
62.	Mr. Ishtiq Sarwar, lect: in Botany, GC, Mansehra.	2. 11. 1988.
63.	Mr. Said Mahmood, lect: in Islamiyat, GC, Haripur.	3. 11. 1988.
64.	Mr. Niaz Mohammad, lect: in Statistics, GC, Haripur.	3. 11. 1988.
65.	Mr. Sangtiaz Khan, lect: in Pashto, GC, Sadda.	3. 11. 1988.
66.	Mr. Sattar Khan, lect: in Islamiyat, GC, Thal.	3. 11. 1988.
67.	Mr. Fazli Hadi, lect: in Urdu, GC, Daggar.	3. 11. 1988.
68.	Mr. Mohammad Ayub, lect: in Economics, GC, Haripur.	3. 11. 1988.
69.	Mr. Mohammad Siddiq, lect: in Urdu, GC, Ghazi.	3. 11. 1988.
70.	Mr. Jan Mohammad, lect: in Islamiyat, GC, Agra.	3. 11. 1988.
71.	Mr. Muzaaffar Khan, lect: in Islamiyat, GC, Parachinar.	3. 11. 1988.
72.	Mr. Tehsil Khan, lect: in English, GC, Kotha.	3. 11. 1988.
73.	Mr. Aminullah, lect: in Pol: Sci, GC, Daggar.	3. 11. 1988.

M. Zauher

Attested to be a true Copy

1.	2.	3.
74.	Mr. Mohammad Fayaz Khan, lect: in Eng: GC, Khar (B. Agency).	3. 11. 1988.
75.	Mr. Sultan-e-Rom, lect: in History, GC, Parachinar.	3. 11. 1988.
76.	Mr. Fazli Sadiq, lect: in English, GC, Dargai.	3. 11. 1988.
77.	Mr. Mohammad Ghayas, lect: in Physics, GC, Abbottabad.	3. 11. 1988.
78.	Mr. Afzal Khan, lect: in Physics, GJC, S/Ahafi (Swat).	3. 11. 1988.
79.	Mr. Ali Mohammad, lect: in Chemistry, GC, Lahor.	3. 11. 1988.
80.	Mr. Nisar Mohammad Khan, lect: in Physics, GC, Tangi.	3. 11. 1988.
81.	Mr. Javed Iqbal, lect: in Urdu, GC, Matta (Swat).	3. 11. 1988.
82.	Mr. Hidayatur Rehman, lect: in Chemistry, GC, Daggar.	3. 11. 1988.
83.	Mr. Mohammad Hassan, lect: in Biology, GC, Parachinar.	3. 11. 1988.
84.	Mr. Saadullah Khan, lect: in Botany, GC, Haripur.	3. 11. 1988.
85.	Mr. Rashmali Khan, lect: in Maths, GC, Miranshah.	3. 11. 1988.
86.	Mr. Mohammad Raees Khan, lect: in Chemistry, GC, Mansehra.	3. 11. 1988.
87.	Mr. Irfanullah, lect: in Statistics, GC, Thall.	3. 11. 1988.
88.	Mr. Jamil Ahmad, lect: in Pol: Sc: GC, Ghazi.	3. 11. 1988.
89.	Mr. Mohammad Azam, lect: in Pol: Sc: GC, Balakot.	3. 11. 1988.
90.	Mr. Abdul Jalil, lect: in English, GC, Toru.	3. 11. 1988.
91.	Mr. Jehangir Khan, lect: in English, GC, Sadda.	3. 11. 1988.
92.	Mr. Attiqullah, lect: in Pol: Sc: GC, Abbottabad.	3. 11. 1988.
93.	Mr. Abdul Qayyum, lect: in Maths, GC, Mansehra.	3. 11. 1988.
94.	Mr. Ghulam Nabi, lect: in Chemistry, GC, Daggar.	3. 11. 1988.
95.	Mr. Sher Mohammad Khan, lect: in Physics, GC, Daggar.	3. 11. 1988.
96.	Mr. Hidayatullah, lect: in History, GC, Parachinar.	3. 11. 1988.
97.	Mr. Nazir Ahmad, lect: in Chemistry, GC, Paharpur.	3. 11. 1988.
98.	Mr. Faridullah Jan, lect: in Economics, GC, D. Adam Khel.	3. 11. 1988.
99.	Mr. Tanveer Ali Shah, lect: in Physics, GC, Chitral.	5. 11. 1988.
100.	Mr. Riffat Khan, lect: in Pak: Stud: GC, Haripur.	5. 11. 1988.
101.	Mr. Akhtar Gul, lect: in Maths, GC, Ekkaghund.	5. 11. 1988.
102.	Mr. Fayyaz Khan, lect: in Physics, GC, Wana.	5. 11. 1988.
103.	Mr. Mohammad Ayub, lect: in Maths, GC, Khar (Bajour).	5. 11. 1988.
104.	Mr. Mohammad Aslam, lect: in Pak: Stud: GC, Fabbi.	3. 11. 1988.
105.	Mr. Sultan-ul-Arifin, lect: in Pak: Stud: GC, Mansehra.	5. 11. 1988.
106.	Mr. Mohammad Zahir Shah, lect: in Urdu, GC, Tangi.	6. 11. 1988.
107.	Mr. Attaullah, lect: in Pol: Sc: GC, Ladha.	6. 11. 1988.
108.	Mr. Mohammad Abdullah, lect: in Pashto, GC, Kotha (Swabi).	7. 11. 1988.
109.	Mr. Niaz Ali, Khattak, lect: in Stats: GC, Paharpur.	7. 11. 1988.
110.	Mr. Ahmad Amin, lect: in Pashto, GC, Chakesar.	7. 11. 1988.
111.	Mr. Javed, lect: in English, GC, Balakot.	7. 11. 1988.
112.	Mr. Fayyaz Khan, lect: in Urdu, GJC, S/Sharif (Swat).	8. 11. 1988.
113.	Mr. Imdadullah, lect: in English, GC, Tangi.	8. 11. 1988.
114.	Mr. Afzal Khan, lect: in Chemistry, GC, Ghazi.	8. 11. 1988.
115.	Mr. Mohammad Riaz, lect: in Pak: Stud: GC, Toru.	8. 11. 1988.
116.	Mr. Sarfaraz, lect: in Physics, GC, Chitral.	8. 11. 1988.
117.	Mr. Ghulam Mustafa, lect: in Urdu, GC, Charsadda.	10. 11. 1988.

Cont. page. ...4...

Zarke

	2	3
118.	Mr. Muhammad Nazir, lect. in Phy; GC, Dir.	13.11.1988
119.	Mr. Bashir Ahmed, lect. in Isl; GC, Ladha.	21.11.1988
120.	Mr. M. Nadeem Hasrat, lect. in Pashto, GC, D.I. Khan.	21.11.1988
121.	Mr. Adil Hussain Shah, lect. in Phy; GC, D.I. Khan.	23.11.1988
122.	Mr. Taj Muhammad Khan, Lect. in Botany, GC, Parachinar.	24.11.1988
123.	Mr. Namrez Khan, lect. in Urdu, GC, Thana.	07.12.1988
124.	Mr. Muhammad Idrees, lect. in Eng; GC, Thana.	07.12.1988
125.	Mr. Hashim Khan, lect. in Bio; GC, Matta.	07.12.1988
126.	Mr. Mutalib Shah, lect. in Chem; GC, Khar.	07.12.1988
127.	Mr. Yar Muhammad, lect. in Pashto, GC, Thana.	07.12.1988
128.	Mr. Mashal Khan, lect. in Pol; S ^C ; GC, Matta.	07.12.1988
129.	Mr. Hazrat Ayub, lect. in Maths; GC, Dargai.	07.12.1988
130.	Mr. Waheed Akhtar, Lect. in Eco; GC, Pabbi.	07.12.1988
131.	Mr. Shabir Ahmed Abbasi, lect. in Eng; GC, A/ABad.	07.12.1988
132.	Mr. Mir Imdad Khan, lect. in Hist/Civ; GC, Thana.	07.12.1988
133.	Mr. Tahir Masood, lect. in Eng; GC, Pabbi.	07.12.1988
134.	Mr. Gul Mir Khan, lect. in Hist; GC, Miran Shah.	07.12.1988
135.	Mr. Shafiq-ur-Rehman, lect. in Chem; GC, Mansehra.	07.12.1988
136.	Mr. Muhammad Javed, lect. in Chem; GC, Pabbi.	07.12.1988
137.	Mr. Muzaffar Khan, lect. in Pashto, GC, Mansehra.	07.12.1988
138.	Mr. Ahmed Hassan, lect. in Hist/Civ; GC, Peshawar.	07.12.1988
139.	Mr. Muhammad Siddiq, lect. in Eco; GC, Charsadda.	07.12.1988
140.	Mr. Rafiq Ahmed, lect. in Phy; GC, Matto.	07.12.1988
141.	Mr. Muhammad Sarwar, Lect. in Maths; GC, Swabi.	07.12.1988
142.	Mr. Muhammad Sarwar, lect. in Bio; GC, Pabbi.	08.12.1988
143.	Mr. Janat-ul-Haq, lect. in Eng; GC, Timergara.	08.12.1988
144.	Mr. Kifayatullah, lect. in Eng; GC, Akora Khattak.	08.12.1988
145.	Mr. Pir Zohid Shah, lect. in Eng; GC, Mansehra.	08.12.1988
146.	Mr. Gul Andaz, lect. in Hist/Civ; GC, Ladha (SWA)	08.12.1988
147.	Mr. Siraj-ud-din, lect. in Hist; /Civ; GC, A/Abad.	08.12.1988
148.	Mr. Sarwat Khan, lect. in Chem; GC, Matta.	08.12.1988
149.	Mr. Saadullah Jan, lect. in Bio; GC, Charsadda.	08.12.1988
150.	Mr. Habibullah, lect. in Bio; GC, Mansehra.	08.12.1988
151.	Mr. Hidsyatullah, lect. in Isl; GC, Alpuri.	08.12.1988
152.	Mr. Muhammad Rehman, lect. in Maths; GC, Timergara.	08.12.1988
153.	Mr. Arif Khan, lect. in Pashto, GJC, S/Sharif (Swat)	08.12.1988
154.	Mr. Abdus Salam, lect. in Stats; GC, D.I. Khan.	08.12.1988
155.	Mr. Sakhi Sarwar, lect. in Engl; GC, Thall.	08.12.1988
156.	Mr. Muhammad Roshan, lect. in Zoo; GC, Chitrol.	08.12.1988
157.	Mr. Saleem Anwar, lect. in Stats; GC, Mansehra.	08.12.1988
158.	Mr. Saiful-Haq, lect. in Chem; GC, Sadda.	08.12.1988
159.	Mr. Imtiaz Ali, lect. in Urdu, GC, Khanpur.	08.12.1988
160.	Mr. Muhammad Tariq, lect. in Hist/Civ; GC, Pabbi.	08.12.1988

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1.	2.	3.
161.	Mr. Mohammad Amin, lect: in English, GC, Daggar.	8. 12. 1988.
162.	Mr. Mohammad Yasin, lect: in Pashto, GC, Bannu.	8. 12. 1988.
163.	Mr. Abdul Karim, lect: in Hist Civ: GHSS, Kuza Banda (Manshera).	8. 12. 1988.
164.	Mr. Manzoor Hussain, lect: in Biology, GC, Haripur.	8. 12. 1988.
165.	Mr. Masoodur Rahman, lect: in Maths, GC, Bannu.	8. 12. 1988.
166.	Mr. Mohammad Rafiq, lect: in Chemistry, GC, Swabi.	8. 12. 1988.
167.	Mr. Arshad Parvez, lect: in Biology, GC, Nowshera.	8. 12. 1988.
168.	Mr. Dilawar Said, lect: in English, GC, Agra.	8. 12. 1988.
169.	Mr. Mohammad Arshad Niaz, lect: in Maths, GC, Oghi.	8. 12. 1988.
170.	Mr. Mohammad Ayaz, lect: in Maths, GC, Daggar.	8. 12. 1988.
171.	Mr. Raees Ahmad Jan, lect: in Physics, GC, Parachinar.	8. 12. 1988.
172.	Mr. Farooq Said, lect: in Maths, GC, Karak.	8. 12. 1988.
173.	Mr. Noor Sahib Khan, lect: in Stats: GC, Miranshah.	8. 12. 1988.
174.	Mr. Shah Rahman, lect: in Economics, GHSS, Katland.	8. 12. 1988.
175.	Mr. Murad Ali Khan, lect: in Stats: GC, Karrak.	8. 12. 1988.
176.	Mr. Zahoorul Haq, lect: in Chemistry, GSSC, Peshawar.	8. 12. 1988.
177.	Mr. Badshah Zaman, lect: in Chemistry, GC, D.I. Khan.	8. 12. 1988.
178.	Mr. Gul Faiz Khan, lect: in Chemistry, GC, Akorakhattak.	8. 12. 1988.
179.	Mr. Naeem Firdus Khan, lect: in Economics, GC, Charsadda.	8. 12. 1988.
180.	Mr. Shaikat Ali, lect: in English, GJC, S/Sharif (Swat).	8. 12. 1988.
181.	Mr. Ghani Rahman, lect: in Hist/Civ: GC, Miranshah.	8. 12. 1988.
182.	Mr. Mushtaq Ahmad, lect: in Physics, GC, Abbottabad.	8. 12. 1988.
183.	Mr. Sami-ul-Haq, lect: in Maths, GJC, S/Sharif (Swat).	8. 12. 1988.
184.	Mr. Mukammal Khan, lect: in Pashto, GC, Dir.	8. 12. 1988.
185.	Mr. Rahmat Ali Khan, lect: in Stats: GC, Peshawar.	8. 12. 1988.
186.	Mr. Taj Wali Khan, lect: in Biology, GC, Timergara.	8. 12. 1988.
187.	Mr. Badr-i-Munir, lect: in Maths, GC, Matla.	8. 12. 1988.
188.	Mr. Tasbihullah, lect: in English, GJC, S/Sharif (Swat).	8. 12. 1988.
189.	Mr. Ayub Zarin, lect: in Pol: Sc: GHSS, Tahkal (Peshawar).	8. 12. 1988.
190.	Mr. Amanullah Khan, lect: in Biology, GC, Tank.	8. 12. 1988.
191.	Mr. Hussain Ahmad, lect: in Maths, GC, Mardan.	8. 12. 1988.
192.	Mr. Mumtaz Ali, lect: in Stats: GC, Badshah-er (Peshawar).	8. 12. 1988.
193.	Mr. Siddiq Akbar, lect: in Urdu, GC, Charsadda.	8. 12. 1988.
194.	Mr. Sajjad Hussain, lect: in Urdu, GC, Nowshera.	8. 12. 1988.
195.	Mr. Iqbal Hussain, lect: in Economics, GC, Nowshera.	8. 12. 1988.
196.	Mr. Mehtab Ahmad, lect: in Economics, GC, Miranshah.	8. 12. 1988.
197.	Mr. Rustam Khan, lect: in Chemistry, GC, Nowshera.	8. 12. 1988.
198.	Mr. Saieer Badshah, lect: in Statistics, GC, Charsadda.	8. 12. 1988.
199.	Mr. Mohammad Yasin, lect: in Chemistry, GC, Bannu.	8. 12. 1988.
200.	Mr. Humayun Khan, lect: in Physics, GC, Haripur.	8. 12. 1988.
201.	Mr. Waheed Akhtar, lect: in Urdu, GC, Abbottabad.	8. 12. 1988.
202.	S. Abdul Waheed, lect: in Chemistry, GC, Oghi.	8. 12. 1988.
203.	Mr. Aftab Ali, lect: in Physics, GC, Nowshera.	8. 12. 1988.
204.	Q. Abdus Subhan, lect: in Physics, GC, Charsadda.	8. 12. 1988.
205.	Mr. Jamal Shah, lect: in Statistics, GC, Akorakhattak.	8. 12. 1988.

M. Zahir

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1.	2.	3.
206.	Mr. Falak Naz Khan, lect: in Economics, GC, Lakki.	8. 12. 1988.
207.	Mr. Rashid Khan, lect: in English, GJC, S/Sharif (Swat).	8. 12. 1988.
208.	Mr. Feroz Shah, lect: in English, GC, Matta.	10. 12. 1988.
209.	Mr. Shabbir Ahmad, lect: in Pashto, GC, Charsadda.	10. 12. 1988.
210.	Mr. Abdul Hakim, lect: in Hist: / Civ: GC, Mansehra.	10. 12. 1988.
211.	Mr. Zafrullah, lect: in Islamiyat, GC, D.I. Khan.	10. 12. 1988.
212.	Mr. Zabeehullah, lect: in Pashto, GC, Thall.	10. 12. 1988.
213.	Mr. Ahd Hussain, lect: in Statistics, GC, Kohat.	10. 12. 1988.
214.	Mr. Faqir-ur-Rahman, lect: in Pak: Stud: GC, Swabi.	10. 12. 1988.
215.	Mr. Nasrullah Khan, lect: in English, GC, Abbottabad.	10. 12. 1988.
216.	Mr. Ahmad Nadim Abbasi, lect: in Urdu, GC, Timergra.	10. 12. 1988.
217.	Mr. Jehanzeb, lect: in Hist/Civ: GC, D.I. Khan.	10. 12. 1988.
218.	Mr. M.Ibrahim Khalid, lect: in Maths, GC, A/Abad.	10. 12. 1988.
219.	S. Hasnain Abbas, lect: in Maths, GC, D.I. Khan.	10. 12. 1988.
220.	Mr. Said Rasool, lect: in Statistics, GC, Bannu.	10. 12. 1988.
221.	Mr. Mohammad Tarid, lect: in Pol: Sc: GC, Kohat.	10. 12. 1988.
222.	Mr. Zahoorud Din, lect: in Pol: Sc: GC, Abbottabad.	10. 12. 1988.
223.	Mr. Shafiur Rahman, lect: in Maths, GC, Karak.	10. 12. 1988.
224.	Mr. Abdus Saeed, lect: in Urdu, GC, Bannu.	11. 12. 1988.
225.	Mr. Badshah Wahab, lect: in Stats: GC, Nowshera.	11. 12. 1988.
226.	Mr. Aurangzeb, lect: in Economics, GC, Mardan.	11. 12. 1988.
227.	Mr. Sarfaraz Khan, lect: in Economics, GHSS, Tahkal (Psh)	12. 12. 1988.
228.	Mr. Mohammad Ayaz, lect: in Hist: Civ: GC, Pabbi.	12. 12. 1988.
229.	Mr. Mir Baz Khan, lect: in Hist/Civ: GC, Matta.	13. 12. 1988.
230.	Mr. Sher Zaman, Khan, lect: in Maths, GC, Swabi.	13. 12. 1988.
231.	Mr. Azad Khan, lect: in Stats: GSSO, Peshawar.	13. 12. 1988.
232.	Mr. Lutfur Rahman, lect: in Maths, GC, Toru.	14. 12. 1988.
233.	Mr. Mukhtar Ahmad, lect: in Urdu, GC, Pabbi.	14. 12. 1988.
234.	Mr. Inayat ur Rahman, lect: in English, GC, Hangu.	14. 12. 1988.
235.	Mr. Mohammad Shafi, lect: in Hist/Civ: GC, Miranshah.	14. 12. 1988.
236.	Mr. Raees Khan, lect: in Pashto, GC, Faharpur.	17. 12. 1988.
237.	Mr. Abdur Rashid, lect: in English, GC, Haripur.	17. 12. 1988.
238.	S. Amjad Ali, lect: in English, GC, Abbottabad.	17. 12. 1988.
239.	Mr. Javed Hussain, lect: in Chemistry, GC, Timergara.	18. 12. 1988.
240.	Mr. Arshad Farvez, lect: in Economics, GHSS, Pirpai.	19. 12. 1988.
241.	Mr. Umar Farooq, lect: in Botany, GC, Peshawar.	21. 12. 1988.
242.	Mr. Taj Mohammad, lect: in Pol: Sc: GHSS-1, Peshawar City.	21. 12. 1988.
243.	Mr. Sahar Gul Wazir, lect: in Pol: Sc: GC, D.I. Khan.	21. 12. 1988.
244.	Mr. Umar Nawaz Khan, lect: in Economics, GC, D.I. Khan.	21. 12. 1988.
245.	Mr. Akbar Shah, lect: in Biology, GC, Swabi.	22. 12. 1988.
246.	Mr. Asmat Shah, lect: in Chemistry, GC, Mansehra.	22. 12. 1988.
247.	Mr. Mahmood Ahmad Jan, lect: in Maths, GC, Mansehra.	22. 12. 1988.
248.	Mr. Ibrahim Khan, lect: in Geography, GC, Balakot.	22. 12. 1988.
249.	Mr. Hroonur Rashid, lect: in English, GC, Alpuri.	24. 12. 1988.

M. Zahid

1.	2.	3
250.	Mr. Manzoor Elahi, lect: in Islamiat, GC, Sherwan.	5. 1. 1989.
251.	Mr. Fazal Dad, lect: in Pol: Sc: GC, Mansehra.	24. 1. 1989.
252.	Mr. Wali Ahad, lect: in Stats: GHSS, Ziarat (Dir).	27. 3. 1989.
253.	Mr. Fazli Malik, lect: in Statists, GHSS, Khanaspur.	28. 3. 1989.
254.	Mr. Sardar Hussain, lect: in Stats: GHSS-1, Peshawar City.	29. 3. 1989.
255.	Mr. Khalid Mahmood, lect: in English GC, Landi Kotal.	29. 3. 1989.
256.	Mr. Shah Zamin, lect: in Pol: Sc: GHSS, Dirpai.	29. 3. 1989.
257.	Mr. Rifaqat Ali, lect: in Stats: GHSS, Tahkal.	29. 3. 1989.
258.	S. Fazli Hadi, lect: in Biology, GC, Booni (Chitral).	29. 3. 1989.
259.	S. Arif Raza Zaidi, lect: in Stats: GHSS, Dirpai.	29. 3. 1989.
260.	Mr. Sharif Khan, lect: in Chemistry, GC, Alpuri (Swat).	30. 3. 1989.
261.	Mr. Zubair Anwar, lect: in Stats: GHSS, Kuza Banda (Mansehra).	30. 3. 1989.
262.	Mr. Mohammad Yusuf, lect: in Eco: GHSS, Nawan Sher (A.A)	30. 3. 1989.
263.	Mr. Ishtiaq Ahmad, lect: in Economics, GHSS Takhti Nusratti.	30. 3. 1989.
264.	Mr. Iftikharud Din, lect: in Stats: GHSS, Risalpur.	30. 3. 1989.
265.	Mr. Khurshid, lect: in Stats: GHSS, Kabal (Swat).	1. 4. 1989.
266.	Mr. Abdur Rab, lect: in Eco: GHSS, Samar Bagh (Dir).	1. 4. 1989.
267.	Mr. Eid Mohammad Khan, lect: in Chem: GC, Mardan.	1. 4. 1989.
268.	Mr. M. Asif Raza, lect: in Pak: Stud: GHSS, Banna.	1. 4. 1989.
269.	Mr. Abdul Karim, lect: in Pashto, GC, Swabi.	1. 4. 1989.
270.	Mr. Mohammad Islam, lect: in Stats: GHSS, Turbela T. Ship.	1. 4. 1989.
271.	Mr. Shahid Farooq, lect: in Physics, GC, Mardan.	1. 4. 1989.
272.	Mr. Saadullah Khan, lect: in Chemistry, GC, Khar.	1. 4. 1989.
273.	Mr. Moeenullah, lect: in Physics, GC, Thana.	1. 4. 1989.
274.	Mr. Mohammad Suleman, lect: in English, GC, Hari pur.	1. 4. 1989.
275.	Mr. Muntaz Haider, lect: in Eco: GHSS-3, Peshawar City.	1. 4. 1989.
276.	S. Irfan Safdar, lect: in English, GC, D.I. Khan.	1. 4. 1989.
277.	Mr. Shamsur Rahman, lect: in Stats: GHSS-1, Peshawar.	2. 4. 1989.
278.	Mr. Azizullah Shah, lect: in Pashto, GC, D.I. Khan.	2. 4. 1989.
279.	Mr. Mohammad Farooq Zia, lect: in Stats: GHSS-3, Peshawar.	3. 4. 1989.
280.	Mr. Nausher Khan, lect: in Stats: GHSS, Baffa (Mansehra).	4. 4. 1989.
281.	Mr. Abbas Gul, lect: in History, GHSS, Umarzai.	4. 4. 1989.
282.	Mr. Fazli Wahid, lect: in Physics, GC, Khar (Bajour).	5. 4. 1989.
283.	Mr. Noor Said, lect: in Stats: GHSS, Katlang.	9. 4. 1989.
284.	Mr. Shad Ayaz, lect: in Chemistry, GJC. S/Shari f (Swat).	10. 4. 1989.
285.	Mr. Mohammad Badshah, lect: in Islamiat, GC, Tabbi.	10. 4. 1989.
286.	Mr. Malik Nasir Daud, lect: in Eco: GC, Swabi.	11. 4. 1989.
287.	Mr. Rab Nawaz, lect: in Urdu, GC, D.I. Khan.	12. 4. 1989.
288.	Mr. Riaz Ahmad, lect: in Zoology, GC, Timergara.	17. 4. 1989.
289.	Mr. Ghulam Habib, lect: in Pashto, GC, Mansehra.	19. 4. 1989.
290.	Mr. Mohammad Riaz, lect: in Stats: GC, Chitral.	20. 4. 1989.
291.	Mr. Nasrullah, lect: in Pak: Stud: GC, Charsadda.	1. 5. 1989.
292.	Mr. Shaukat Ali, lect: in Pol: Sc: GC, Mansehra.	14. 5. 1989.

Cont. page.

Mr. Zaidi
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1.	2.	3.
293.	Mr. Mansif Khan, lect: in Chemistry, GC, Chitral.	6.7.1989.
294.	Mr. Azizul Haq, lect: in Stats: GC, Mansehra.	6.7.1989.
295.	Mr. Abdur Rahman, lect: in Chemistry, GC, Kohat.	1.9.1989.
296.	Mr. Mohammad Salim, Bhooh, lect: in Pol: Sc: GC, Sadda.	13.9.1989.
297.	Mr. Sarfaraz, lect: in Economics, GC, Thana.	13.9.1989.
298.	Mr. Afzal Amar, lecturer in Law, Govt. College, Bannu.	14.9.1989.

CONDITIONS.

1. The intervening period ~~between~~ the enactment of the Act and the date of taking over charge of the officers at S.No. 156, 223, 229, 278, 282, 287 & 289 is condoned and treated as extra ordinary leave without pay and withdrawing the termination orders in their case as required under the Act.
2. The inter-se-seniority of these civil servants shall be determined by the Government according to the service rules in-vogue.

SECRETARY TO GOVT. OF NWFP,
EDUCATION DEPTT: PESHAWAR.

Endst: No. S.O. (COLLEGES) I-6/90

Dated Peshawar the 14.6.1990

Copy of the above is forwarded for information and necessary action to:-

1. I.S. to Chief Minister N.W.F.P., Peshawar.
2. I.S. to Adviser to the Chief Minister NWFP, for Education.
3. The Director of Education (Colleges) NWFP, Peshawar w/p to his memo: No. 9269/A-167/Regularization/CA-II dated 19.3.1990.
4. The Director of Education (Schools) NWFP, Peshawar.
5. The Principal, Govt. Colleges (Male & Female) concerned.
6. The Principal, Govt. Higher Secondary Schools concerned.
7. The Accountant General, N.W.F.P., Peshawar.
8. The District Accounts Officers concerned.
9. The Agency Accounts Officers concerned.
10. The Manager, Govt. Printing Press, NWFP, Peshawar.
11. The officers concerned.

attested
14/6/90

Principal
Govt. Degree College
Chitral

Abdul Qadeer Ansari
(ABDUL QADEER ANSARI)
SECTION OFFICER (COLLEGES)

Datta
ATTENTION

M. Sahir
3/10/90



Annexure "A/1"
Page-1
GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

19

Dated Peshawar 10th June, 2013.

NOTIFICATION

No. SO(COLLEGES-ID)HED/15-1/2013. The Competent Authority, on the recommendation of the Provincial Selection Board (PSB), is pleased to promote the following Male Assistant Professors (BPS-18) to the post of Associate Professors (BPS-19), on regular basis of College cadre in Higher Education Department with immediate effect:

Sr.	Name/Designation/ Present Posting
1.	Mr. Bashir Hussain Assistant Professor of Urdu GDC, Nathiagali
2.	Muslim Khan, Assistant Professor of Urdu GDC, Khar Bajur.
3.	Fayaz Ahmad Khan, Assistant Professor of Geography. (Working at Civil Secret. Housing Department).
4.	Muhammad Kamal Khan, Assistant Professor of English GDC, Kabal Swat
5.	Mr. Javed Khan Assistant Professor of Botany, GC, Dara Adam Khel (FR Kohat)
6.	Mr. Ghadir Hussain Assistant Professor of Chemistry GC, Parachinar
7.	Mr. Tahir Hussain Associate Professor Pakistan Study GPGC, Parachinar
8.	Mr. Janas Khan Assistant Professor of English GDC, Lassan Nawab
9.	Shaukhat Ali Shah, Assistant Professor of Urdu GDC, Oghi
10.	Ikram Ullah Assistant Professor of Political Science On Deputation
11.	Dr. Muhammad Nisar Khan Assistant Professor of Chemistry GDC, Akkora Khattak
12.	Ahmad Jan Assistant Professor of Zoology, GPGC, Parachinar
13.	Fazali Subhan Assistant Professor of Maths, GDC, GPGC, Mardan
14.	Jawas Khan Assistant Professor of Physics GDC, Dara Adam Khel.
15.	Hafiz Naeem-ur Rehman Assistant Professor of Computer Science GPGC, Haripur.
16.	Shahid Ahmad Assistant Professor of Political Science GPGC, Mardan
17.	Muhammad Khurshid Assistant Professor of Botany GDC, Thana
18.	Muhammad Iqbal Wazir Assistant Professor of Pakistan Study GDC, Wana
19.	Fazli Wahid Assistant Professor of Islamiyat GDC, Totalai (Buner)
20.	Khalid Mahmood Assistant Professor of Geography GPGC, Haripur
21.	Tehsil Khan Assistant Professor of English GDC, D.I.Khan
22.	Nisar Muhammad Assistant Professor of Physics GPGC, Swat
23.	Javed Iqbal, Assistant Professor of Urdu GPGC Swat.
24.	Hidayat-Ur Rahman Assistant Professor of Chemistry GPGC, Mardan
25.	Muhammad Aslam, Assistant Professor of Pakistan Study GDC, Jamrud
26.	Saddaullah Khan Assistant Professor of Botany GDC, Gori Wala Bannu
27.	Muhammad Raees Khan Assistant Professor of Chemistry GDC, Latamber
28.	Jamil Ahmad Assistant Professor of Political Science GDC, Daggar
29.	Muhammad Azam Assistant Professor of Political Science GDC, Kotka Habibullah
30.	Abdul Jalil Assistant Professor of English GPGC, Karak
31.	Muhammad Nazir Assistant Professor of Physics GDC, Batkhela (Malakand)
32.	Jehangir Khan Assistant Professor of English GDC, Miranshah
33.	Ghulam Nabbi Assistant Professor of Chemistry GPGC, Mardan
34.	Sher Muhammad Khan Assistant Professor of Physics GDC, Isak Khel
35.	Tanveer Ali Shah Assistant Professor of Physics GSSC, Peshawar
36.	Riffat Khan Assistant Professor of Pakistan Study GPGC, Mandian Abbottabad
37.	Fayyaz Khan Assistant Professor of Physics GDC, Wana
38.	Muhammad Sultanul Arifin, Assistant Professor of Pakistan Study GDC, Mingora Swat.
39.	Niaz Ali Khattak Assistant Professor of Statistics GDC, Pabbi

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100.	Mukammil Khan Assistant Professor of Pashto GPGJC, Swat
101.	Taj Wali Khan Assistant Professor of Biology GPGC, Swabi
102.	Badrul Munir Assistant Professor of Maths GPGC, Matta (Swat)
103.	Tasbih Ullah Assistant Professor of English GDC, Hayatabad
104.	Ayub Zarin Assistant Professor of Political Science GDC, Chirtal
105.	Aman Ullah Assistant Professor of Biology GDC, Hayatabad
106.	Hussain Ahmad Assistant Professor of Maths GPGC, Charsadda
107.	Mumtaz Ali Assistant Professor of Statistics GPGJC, Swat
108.	Sadiq Akbar Assistant Professor of Urdu GDC, No.2 Mardan
109.	Shaukat Ali Assistant Professor of English GPGC, Matta (Swat).
110.	Muhammad Sadiq Assistant Professor of Islamiyat GDC, Ogai
111.	Iqbal Hussain Assistant Professor of Economics GDC, Thana
112.	Saiful Maluk Assistant Professor of Islamiyat GDC, Nowshera
113.	Rustam Khan Assistant Professor of Chemistry GDC, Takht Bhai Mardan
114.	Humayun Khan Assistant Professor of Physics GDC, Mandian (Abbottabad).
115.	Aftab Ali Assistant Professor of Physics GDC, Alpuri

2. In terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the Associate Professors on their promotion shall be on probation for a period of one (01) year:

3. Consequent upon the above, the following adjustments are made:-

S#	Name / Designation / Present Posting	Posted at	REMARKS
1.	Mr. Bashir Hussain Assistant Professor of Urdu GDC, Nathiagali	Associate Professor GDC, Nathiagali	Against Vacant Post
2.	Muslim Khan, Assistant Professor of Urdu GDC, Khar Bajur.	Associate Professor of Urdu, Services placed at the disposal of Director of Education (FATA).	
3.	Fayaz Ahmad Khan, Assistant Professor of Geography presently working at Section Officer, Housing Department.	He will actualize his promotion as Associate Professor of Geography at GPGC, Charsadda against vacant post and will re-join as Section Officer, Housing Department.	
4.	Muhammad Kamal Khan, Assistant Professor of English GDC, Kabal Swat.	Associate Professor of English GC, Peshawar.	Against Vacant Post
5.	Mr. Javed Khan Assistant Professor of Botany, GC, Dara Adam Khel FR Kohat.	Associate Professor of Botany GC, No. 1, D.I. Khan.	Against Vacant Post
6.	Mr. Ghadir Hussain Assistant Professor of Chemistry GC, Parachinar	Associate Professor of Chemistry GDC, No. 1, D.I. Khan.	Against Vacant Post
7.	Mr. Tahir Hussain Assistant Professor Pakistan Study GPGC, Parachinar	Associate Professor of Pakistan Study, GDC, Paharpur, D.I. Khan.	Against Vacant Post
8.	Mr. Janas Khan Assistant Professor of English GDC, Lassan Nawab	Associate Professor of English GDC, Lassan Nawab	Against Vacant Post
9.	Shaukat Ali Shah, Assistant Professor of Urdu GDC, Oghi	Associate Professor of Urdu GDC, Zaida (Swabi)	Against Vacant Post
10.	Ikram Ullah Assistant Professor of Political Science On Deputation	Associate Professor of Political Science GDC, S.K.Bala, Bannu	Against Vacant Post
11.	Dr. Muhammad Nisar Khan Assistant Professor of Chemistry GDC, Akora Khattak	Associate Professor of Chemistry GDC, Akora Khattak	Against Vacant Post
12.	Ahmad Jan Assistant Professor of Zoology, GPGC, Parachinar	Associate Professor of Zoology, GDC, Paharpur, D.I. Khan.	Against Vacant Post
13.	Fazli Subhan Assistant Professor of Maths, GPGC, Mardan	Associate Professor of Maths GPGC, Mardan	Against Vacant Post

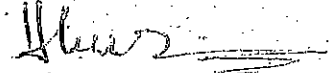
M. Zaidi
Attested to be true copy

21

ENDST: No. & Date Even.

Copy forwarded to the: -

1. Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Secretary, Social Sectors Department, FATA Secretariat, Warsak Road, Peshawar.
4. Accountant General Khyber Pakhtunkhwa Peshawar.
5. Director, Higher Education, Khyber Pakhtunkhwa Peshawar.
6. Director of Education (FATA), FATA Secretariat, Warsak Road, Peshawar.
7. Director Information, Khyber Pakhtunkhwa, Peshawar.
8. Districts / Agency Accounts Officers, concerned.
9. Principals, of the concerned Government Colleges.
10. Manager, Govt. Printing Press Khyber Pakhtunkhwa Peshawar.
11. P.S. to Chief Secretary Khyber Pakhtunkhwa Peshawar.
12. P.S. to Minister for Higher Education, Khyber Pakhtunkhwa, Peshawar.
13. Officers concerned.



(HABIB-UR-RAHMAN)

SECTION OFFICER (COLLEGES-II)

Tariq 6/10/08



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(22)



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT
CIVIL SECRETARIAT

Dated Peshawar the 14/06/2022

NOTIFICATION

NO.SO(C-I)/HE/1-9/LPR/2021: In pursuance of Sub-Section (1) of Section 13 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII) **Mr.Ayub Zarin**, Ex-Professor of Political Science (BPS-20), Govt: Degree College, Chitral stands retired from Government Service with effect from **09.05.2022** (A.N) on attaining sixtieth (60th) year of age, as his date of birth is **10.05.1962**

2. In terms of Rule-20 of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981 and instructions there-under issued from time to time, sanction is hereby accorded for leave encashment in lieu of LPR equal to 365-days in favour of **Mr.Ayub Zarin**, Ex-Professor of Political Science (BPS-20), Govt: Degree College, Chitral.

SECRETARY

HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN.

Copy forwarded to the

1. Director, Higher Education Khyber Pakhtunkhwa, Peshawar w/r to his letter No.2562/CA-I/Estt: Branch/A-12/ **Mr.Ayub Zarin**, Political Science, 06.06.2022.
2. Principal Govt: Degree College, Chitral.
3. District Accounts Officer, Chitral.
4. Director (*HEMIS*), Higher Education Department.
- ✓ 5. Officer concerned.
6. Ps Secretary Higher Education Department.
7. Master File.

m Zarin

Riaz

(RIAZ)

SECTION OFFICER (COLLEGES-I)

By Registered Post

Annexure - C²



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

23

NO.SO(C-1)HED/1-9/PP/ Ayub Zarin (Prof: Political Science) / 6519-22 Dated 31/10/2022

To

The District Accounts Officer,
Chitral.

Subject:

PENSION PAPERS IN RESPECT OF MR. AYUB ZARIN, RETIRED
PROFESSOR (BS-20) GOVT. DEGREE COLLEGE, CHITRAL.

I am directed to enclose herewith Director, Higher Education's letter No.6071/Estt: Branch C.A.I dated 25/10/2022, alongwith Pension Papers (in duplicate) in respect of Mr. Ayub Zarin S/o Habib Ullah Khan, Professor of Political Science (BS-20) Govt; Degree College, Chitral, duly signed by the competent authority for favour of further necessary action at your end.

2. The overpayment shown in the LPC, issued by your office, may be recovered from his commutation amount as per following detail:

S.No	Description	Amount recoverable
I.	Pay & Allowances w.e.f. 01/12/2013 to 31/05/2022	524,815
II.	Leave encashment in lieu of LPR	100,580
Total recoverable amount:		625,395

Encl. As above.

(ALLA-UD-DIN KHATTAK)
Section Officer (Colleges-I)

Encl: No. & Date of even.

Copy forwarded for information & necessary action to the:

- 1) Director, Higher Education Khyber Pakhtunkhwa, Peshawar w/r to his letter referred above.
- 2) Principal, Govt; Degree College, Chitral
- 3) Mr. Ayub Zarin S/o Habib Ullah Khan Professor of Political Science, Govt; Degree College, Chitral.
- 4) PS to Secretary, Higher Education Department.
- 5) Master file.

(ALLA-UD-DIN KHATTAK)
Section Officer (Colleges-I)

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Pension Calculation in respect of Pro. AYOUB ZARIN (BPS-20)

Retired from Government of Khyber Pakhtunkhwa on Superannuation Pension
Opted for 35% commutation

25

Date of Retirement :	Year - Month - Day
Date of Birth :	2022 - 05 - 10
Age at Retirement :	1962 - 05 - 10
	<hr/>
	60 y

Date of Retirement :	2022 - 05 - 10
Date of Appointment :	1988 - 12 - 08
Length Service :	<hr/>
	33 y, 5 m, 2 d

Qualifying Service :	30 years
Basic Pay :	132,230.00
Total Emoluments :	<hr/>
	132,230.00
Gross Pension :	92,561.00
35% Commuted Portion :	32,396.35
Net Pension :	60,164.65
Commutation Rate :	148.4628
Commutation Amount :	4,809,652.83
Date of Restoration :	10-05-2034

Net Pension :		60,164.65
15% increase of 2010	0.00	60,164.65
15% increase of 2011	9,024.70	69,189.35
20% increase of 2012	0.00	69,189.35
15% increase of 2013	0.00	69,189.35
10% increase of 2014	0.00	69,189.35
10% increase of 2015	6,918.94	76,108.29
10% increase of 2016	7,610.83	83,719.12
10% increase of 2017	8,371.91	92,091.03
10% increase of 2018	9,209.10	101,300.13
10% increase of 2019	10,130.01	111,430.14
10% increase of 2021	11,143.01	122,573.15
15% increase of 2022	18,385.97	140,959.12
20% Medical Allowance of 2010	12,032.93	
25% increase on Medical Allowance	3,008.23	
Orderly Allowance :	NaN	
Net Pension Payable Rs		156,000.28

m Zahir

Attested to be true Copy



GOVERNMENT COLLEGE CHITRAL

Telephone/ Fax No. 0943-412682

e-mail: gdcchitral@gmail.com



26

NON-INVOLVEMENT AND PENSIONABLE SERVICE CERTIFICATE FOR THE PURPOSE OF PENSION IN RESPECT OF MR. AYUB ZARIN EX-PROFESSOR GOVT: DEGREE COLLEGE CHITRAL

1. Certified that the officer concerned is neither involved in any Department/ Anti-Corruption/NAB/Judicial case, nor any other inquiry is pending against him.
2. Certified that the officer concerned has rendered his entire service under the Govt. of Khyber Pakhtunkhwa against a pensionable post.
3. Certified that he had not remained in Deputation or in foreign service within Pakistan/Abroad in his entire service.
4. Certified that there is no break/deficiency in his entire service.
5. Certified that the Pension/Commutation money has been calculated and found correct.
6. Certified that the amount of pension and commutation in respect of the officer concerned has been checked by the Accounts expert and found correct.
7. There is no outstanding amount against the officer concerned.

Wah
PRINCIPAL
GOVT: DEGREE COLLEGE
CHITRAL
Principal
Govt. Degree College
Chitral

Wah
DDO
GOVT: DEGREE COLLEGE
CHITRAL
D.D.O
Govt. Degree College
Chitral

Wah
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Government of Khyber Pakhtunkhwa
District Accounts Office Chitral
Monthly Salary Statement (March-2022)



27

Personal Information of Mr AYOOB ZARIN d/w/s of HABIB ULLAH KHAN

Personnel Number: 00315807 CNIC: 1520105850315 NTN:
 Date of Birth: 10.05.1962 Entry into Govt. Service: 08.12.1988 Length of Service: 33 Years 03 Months 025 Days

Employment Category: Vocational Temporary

Designation: ASSOCIATE PROFESSOR 80001197-GOVERNMENT OF KHYBER PAKH
 DDO Code: CL4174-

Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: EDU00040148 Interest Applied: Yes GPF Balance: 3,343,912.00

Vendor Number: -
 Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 19 Pay Stage: 20

Wage type	Amount	Wage type	Amount
0001 Basic Pay	120,210.00	3046 Personal Pay(Maximi Grade)	3,050.00
1001 House Rent Allowance 45%	13,284.00	1210 Convey Allowance 2005	5,000.00
1518 Entertainment Allowance	500.00	1593 Incentive Allowance	13,895.00
1947 Medical Allow 15% (16-22)	5,211.00	2148 15% Adhoc Relief All-2013	2,670.00
2199 Adhoc Relief Allow @10%	1,782.00	2211 Adhoc Relief All 2016 10%	9,033.00
2224 Adhoc Relief All 2017 10%	12,326.00	2247 Adhoc Relief All 2018 10%	12,326.00
2265 Adhoc Relief All 2019 05%	6,163.00	2309 Adhoc Relief All 2021 10%	12,326.00
2316 Teaching Allowance 2021	11,842.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3019 GPF Subscription	-7,180.00	3501 Benevolent Fund	-1,500.00
3609 Income Tax	-15,352.00	3621 Recovery of Pay	-48,576.00
3990 Emp.Edn. Fund KPK	-250.00	4804 R. Benefits & Death Comp:	-1,600.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 240,047.98 Recovered till March-2022: 133,983.00 Exempted: 60011.23 Recoverable: 46,053.75

Gross Pay (Rs.): 229,618.00 Deductions: (Rs.): -74,458.00 Net Pay: (Rs.): 155,160.00

Payee Name: AYOOB ZARIN

Account Number: 6152-7

Bank Details: THE BANK OF KHYBER, 080011 CHITRAL BRANCH ATALIQ BAZAR CHITRAL, CHITRAL BRANCH, ATALIQ BAZAR CH, CHITRAL

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: CHITRAL Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email:

(344211/11.04.2022/15:02:40) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

M. Zahir
 Attested to be true Copy

Government of Khyber Pakhtunkhwa
District Accounts Office Chitral
Monthly Salary Statement (March-2022)



28

Personal Information of Mr ZUHRUD DIN d/w/s of HAZRAT

Personnel Number: 00315735 CNIC: 1520208312657 NTN:
 Date of Birth: 01.01.1964 Entry into Govt. Service: 10.12.1988 Length of Service: 33 Years 03 Months 023 Days

Employment Category: Vocational Temporary

Designation: ASSOCIATE PROFESSOR 80001197-GOVERNMENT OF KHYBER PAKH
 DDO Code: CL4174-
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: EDUAB014185 Interest Applied: Yes GPF Balance: 3,460,679.00
 Vendor Number: -
 Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 19 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	120,210.00	1001	House Rent Allowance 45%	13,284.00
1210	Convey Allowance 2005	5,000.00	1518	Entertainment Allowance	500.00
1593	Incentive Allowance	13,895.00	1947	Medical Allow 15% (16-22)	5,211.00
2148	15% Adhoc Relief All-2013	2,590.00	2199	Adhoc Relief Allow @10%	1,730.00
2211	Adhoc Relief All 2016 10%	8,777.00	2224	Adhoc Relief All 2017 10%	12,021.00
2247	Adhoc Relief All 2018 10%	12,021.00	2265	Adhoc Relief All 2019 05%	6,010.00
2309	Adhoc Relief All 2021 10%	12,021.00	2316	Teaching Allowance 2021	11,842.00

Deductions - General

Wage type		Amount	Wage type		Amount
3019	GPF Subscription	-7,180.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-14,694.00	3621	Recovery of Pay	-13,535.00
3990	Emp. Edu. Fund KPK	-250.00	4004	R. Benefits & Death Comp:	-1,600.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 230,773.41 Recovered till March-2022: 129,002.00 Exempted: 57692.35 Recoverable: 44,079.06

Gross Pay (Rs.): 225,112.00 Deductions: (Rs.): -38,759.00 Net Pay: (Rs.): 186,353.00

Payee Name: ZUHRUD DIN

Account Number: 4649-6

Bank Details: NATIONAL BANK OF PAKISTAN, 230321 CHITRAL BRANCH CHITRAL BRANCH,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: CHITRAL Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address: City: Email:

(Handwritten signature)

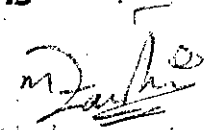
BEFORE SECRETARY HIGHER EDUCATION DEPARTMENT
(COLLEGES), GOVERNMENT OF KHYBER PAKHTUNKHWA,
CIVIL SECRETARIAT, PESHAWAR

DEPARTMENTAL APPEAL/REPRESENTATION FOR ILLEGAL
DEDUCTION OF PENSIONARY BENEFITS OF THE
APPELLANT

Respectfully Sheweth:

1. That the appellant was appointed as Lecturer Political Science BPS-17 vide order dated 08.12.1988 against the vacant post in Higher Education Department, Khyber Pakhtunkhwa the than NWFP.
2. That from the date of appointment, the appellant was performing his duties to the entire satisfaction of his superior and there was not a single complaint against the appellant in his whole career.
3. That due to the unblemished Service record of the appellant, it is clear that the appellant was regularly performing his duties and as such he was promoted to BPS-18, BPS-19 & BPS-20 respectively with monetary benefits/Perks and Privileges.
4. That the appellant retired from the service at the age of superannuation (60 years) on 09.06.2022.

(Copy of retirement notification dated 09.05.2022 is attached herewith as mark-"A")


Attested to be true copy

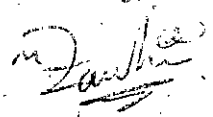
5. That after retirement the appellant waited and approached to the concern department for release of his pension. Surprisingly the present appellant on 16-11-2022 came to know that letter bearing No: SO(C-1) HED/1-9/PP/Ayub Zarin (Prof: Political Science) 6519-22 dated 31.10.2022 issued by Higher Education, Archives & Libraries Department has order for recovery of overpayment shown in the Pay & Allowances w.e.f 01/12/2013 to 31/05/2022 and Leave encashment in lieu of LPR, may be recovered from his commutation amounting Rs: 625,395/-.

(Copy of letter dated 31.10.2022 is attached herewith as mark-"B")

6. That in light of the judgments of the Superior Courts of the country, once a benefit accrued to the appellant cannot be taken back. That recovery of the said amount is the violation of the Fundamental Rights of appellant as well prevailing law on the subject.

7. That no show-cause notice was served upon the appellant before passing the impugned order and same was issued at the back of the appellant, hence the said order is illegal, of no legal effect, void and liable to be cancelled/struck down.

8. That it is a settled law that no one should be condemned unheard and in the present case the appellant has not been given opportunity of being heard, hence the impugned letter dated 31-10-2022 is liable to be struck down/cancelled.



11/11/2022

9. That the vested rights of the appellant as guaranteed and enshrined in the Constitutional of Pakistan have been violated while recovering the amount after retirement.
10. That no reason for the alleged recovery was ever mentioned in the said order/letter.
11. That impugned letter and order of recovery is based on surmises, conjectures and beyond the limitation.
12. That said disbursement was regularly made to appellant during Service period after proper Audit by the Account Office as well college and as such same recovery cannot be ordered/made at the belated stage of retirement.
13. That appellant has already done/worked/performed duties against the receipt of said payment which cannot be taken back.
14. That awarding of financial benefits to the appellant is the exclusive prerogative to the appellant, and the present appellant was not at fault, thus the appellant cannot be punished for the same.
15. That Supreme Court has time and again held that Pension benefits be released to the Retired Employee within a month but the same was not only been delayed but deducted which too is illegal and same amounts to violation of law and judgments of the Apex Court of the country.



It is, therefore, humbly prayed that on acceptance of this appeal, the impugned letter bearing No SO(C-1) HED/1-9/PP/ 6519-22 dated 31.10.2022 may very kindly be set aside/recalled/cancelled and direct the District Accounts Officer to issue correct pension and already deducted amount of the appellant may kindly be released/adjusted and all the pension amounts which are still outstanding may kindly be released forthwith along with compensations.

APPELLANT

AyubZarin

S/o Habib Ullah Khan

Ex: Professor GDC, Chitral Lower

CNIC # 0344-9702735


Cell #

Correspondence Address:

Room No: 20, Lawang
Tower, Khyber Super
Market, Bara Road,
Peshawar Cantt

03439708730, 03349456663

Dated: 12-12-2022


Attested to be true copy

E
Annexure - "E"

33



Office of the
District Accounts Officer
Chitral Lower

Ph # 0943-412625 Fax# 0943-412109

E.mail: daochitral@gmail.com

No. DAO/Admn/Misc Letters/ 2022-23 62

Dated 9/2/2023

To,
355
22/12/2023

The Section officer (Colleges-I),
Govt. of Khyber Pakhtunkhwa,
Higher Education Archives & Libraries Department,
Peshawar.

Subject: DEPARTMENTAL APPEAL/PRESENTATION FOR ILLEGAL DEDUCTION OF PENSIONARY BENEFITS OF THE APPELLANT.

Please refer to your office letter No.SO(C-I) HED/1-9/Ayub Zarin (Prof. Polic, Sci) dated 25th January 2023 on the subject cited above.

The views/comments of this office, in the instant case, as under:-

1. According to Section 17 of KPK Civil Servant Act, a Civil Servant shall be entitled to pay sanctioned for the post in accordance with Rules.
2. Vide Rule 7 of KPK Pay Revision Rule 1978, the Annual Increment shall be allowed to a Civil Servant in 1st December of a year after completion of at least six months service at a stage of Pay.
3. Vide Rule 10 (1) (i) Pay of Pay Revision Rule 1978, Civil Servant on his promotion from lower to higher post shall be fixed at next higher stage of the higher Post and a premature increment shall be allowed therein.
4. Vide Rule 10 (3) of the above Rules, a Civil Servant shall opt for re-fixation of pay on his promotion, from lower to higher post, after availing annual increment in lower post on 1st December if his promotion is made during 2nd June to 30th November of a year.
5. Mr. Ayub Zarin was promoted to the post of Associate Professor (B-19) on 11-06-2013 from the post of Assistant Professor (B-18).
6. The said Professor was drawing Basic Pay in B-18 @ Rs.47000/P.M on 01-12-2012. The pay of Professor was fixed @Rs.50200/P.M in B-19 on 11-06-2013 after allowing next stage plus one premature increment.

Asst. to be made COPY
DHO

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7. The pay of the Professor was also re-fixed by allowing Annual Increment of B-18 due on 01-12-2013 which comes @ Rs.48500/P.M. The correspondence stage of Rs.48500/P.M comes to Rs.50200/P.M in B-19 on 01-12-2013.
8. Hence, both the ways i.e Rule 10 (1) (I) and Rule 10 (3) of Pay Revision Rule 1978, the Basic Pay of the Professor fixed @ Rs.50200/P.M as on 01-12-2013.
9. In the light of above quoted Rules the Professor is entitled to Basic Pay @ Rs.50200/P.M on 11-06-2013 & 01.12.2013, but due to computer mistake one additional increment added in his Basic Pay on 01-12-2013 raising Basic Pay from Rs.50200/P.M to Rs.51800/P.M resulting an over payment of one increment.
10. The overpayment made to the Professor, as highlighted at para 8 and 9 above, could not be detected/pointed out by Drawing and Disbursing officer up till his retirement.
11. On receipt of Notification of retirement of the Professor, this office issued him Last Pay Certificate for the purpose calculation of pension after overhauling of his Service record i.e Service Statement and History of Service for which this office is fully responsible under the Rules. Hence, overpaid amount was calculated carefully and intimated to the Pension Sanctioning authoring and the Professor accordingly.

District Accounts officer
Chitral Lower

Endst No.and Date Even

Copy forwarded to:-

1. PS to Secretary, Higher Education Department Peshawar
2. Mr.Ayub Zarin Ex- Professor of Political Science Govt. Degree College Chitral Lower

District Accounts officer
Chitral Lower

ALL INFORMATION COPY



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

No SO(C-1) HED 1-9/ Prof. Ayub Zarin / 4425

Dated 13/03/2023

To,

The Director,
Higher Education Department,
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL/PRESENTATION FOR ILLEGAL DEDUCTION OF PENSIONARY BENEFITS OF THE APPELLANT.

I am directed to refer your letter No.111/Estt: Branch Pension branch dated 05/01/2023 on the subject cited above and to enclose herewith a self-explanatory letter No.DAO/Admn/Misc Letters/2022-23/62 dated 09/02/2023, received from District Accounts Officer, Chitral Lower, which may be forwarded to Mr. Ayub Zarin, Ex-Professor, Govt Degree College, Chitral for information.

Encl: As above.

Ends: No. & Date of even.

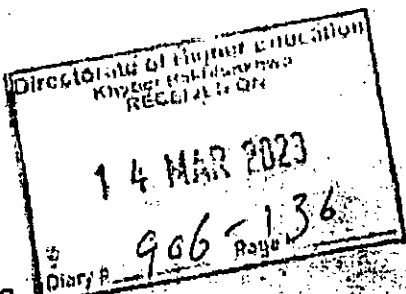
Copy forwarded for information to:

1. PS to Secretary, Higher Education Department.
2. Master File.

Section Officer (Colleges-I)

SECTION OFFICER (Colleges-I)

Attested to be true Copy



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14153

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

Appeal No _____ -M of 2023

AyubZarin (Appellant)

VERSUS

Secretary
Higher Education & others (Respondents)

Subject: Notice

Dear take a notice, I am going to file the above titled appeal on behalf of the appellants against the action & inaction of yours before the **SERVICE TRIBUNAL KHYBER PAKHTUNKHWA AT PESHAWAR** Peshawar High Court Bench Mingora, Swat. (Copy of appeal is attached herewith)

Thanks

RAHIMULLAH CHITRALI
& MAQBOOL ZARIN *Signature*
Advocates, High Court

POWER OF ATTORNEY/VAKALATNAMA

37

BEFORE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA

_____/2023

Ayub Zarin

[Petitioner/Appellant

VERSUS

Government of KPK and Others

[Respondents

I/WE PETITIONER hereby appoint **Mr. Rahim Ullah Chitrali** and **Maqbool Zarin**, Advocates in the above mentioned case, to do all or any of the following acts, deeds things.

9. To appear, act, sign, record Statement and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard; and other proceedings arising out of or connected therewith.
10. To sign, verify compromise and file or withdraw all proceedings, petitions, appeals, affidavits and any other documents as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at its stages.
11. To receive payments of and issue receipts for all money that may be or become due and payable to us during the course or on the conclusion of the proceedings.
12. To do all other acts and things which may be deemed necessary or advisable during the course of the proceedings.


AND HEREBY AGREE:

- g) To ratify the said advocate may do in the proceedings.
- h) Not to hold the Advocate responsible if the said case be proceed ex-party or dismissed in default in consequence of absence from the Court/Tribunal when it is called for hearing.
- i) That the Advocate shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fees remains unpaid.

In witness whereof I/WE have signed this power of Attorney/Vakalatnama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this 10th day of **March** at **Peshawar**.

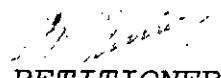
Accepted

Terms Accepted


Rahim Ullah Chitrali
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