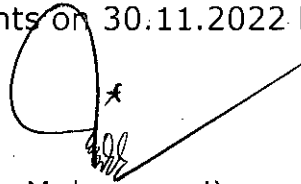


15.09.2022

Learned counsel for the appellant present. Mr. Rahim Zad, ADEO (Litigation) alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief of the instant appeal. Adjourned. To come up for arguments on 30.11.2022 before the D.B.



(Mian Muhammad)
Member (Executive)



(Salah-Ud-Din)
Member (Judicial)

30/11/22

Deleted from list to come
up on 22-2-23



22.02.2023

Bench is incomplete, therefore, case is adjourned
to 24.05.2023 for the same as before.




Reader

25.04.2022

Clerk to counsel for the appellant present. Mr. Muhammad Adeel Butt, learned Additional Advocate General for respondents present. Respondent No.2 in person present and submitted an application that issue pertains to District Accounts Office Kohistan Upper, but the appellant has wrongly arrayed District Accounts Officer District Kohistan Lower as respondent No.2 in the heading of the appeal, therefore, necessary correction in this respect be made and District Accounts Officer District Lower Kohistan may be deleted from the panel of respondents. The application is placed on file. Learned counsel for appellant is not available, therefore, to come up for arguments on application on 18.07.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah-Ud-Din)
Member (J)

18.07.2022

Due to non-availability of Bench, case is adjourned to 15.09.2022 for the same as before.

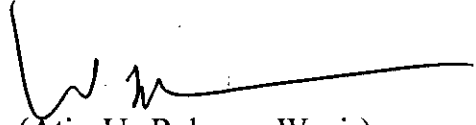


Reader

10.01.2022

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Mr. Qazi Abdullah Assistant Treasury Officer for respondents No. 1, 2 and Mr. Rahimdad ADEO for respondents No. 3 to 5 present.

Reply/comments on behalf of respondents No. 3 to 5 have already been submitted which are placed on file. Representative of respondents No. 1 & 2 sought time for submission of reply/comments. Last opportunity is granted to respondents No. 1 & 2 to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 25.04.2022.


(Atiq-Ur-Rehman Wazir)
Member (E)

12.07.2021

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


Chairman


Stipulated period passed reply not submitted.

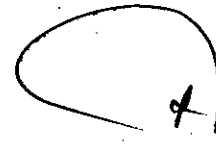
13.10.2021

Junior to counsel for appellant counsel present.

Kabir Ullah Khattak learned Additional Advocate General alongwith M/S Rahimdad ADEO and Farman Shah Senior Auditor for respondents present.

Reply on behalf of respondents is still awaited. Respondents made a request for time to submit reply/comments; granted with direction to furnish the same within 10 days in office. If the reply/comments are not submitted within stipulated time, right of the respondents for submission of reply shall be deemed as struck off. To come up for arguments on 10.01.2022 before D.B.


(Atiq-Ur-Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

02.06.2021

Counsel for the appellant present. Preliminary arguments heard.

Apparently the grievance of the appellant pertains to stoppage of salary without disclosing any order. If there is no order in background of the stoppage of the salary of the appellant, then he has recurring cause of action for non-payment of salary each month. Thus, the question of limitation will be taken after submission of comments by the department in hearing, if remains relevant. Points raised need consideration. The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 13.10.2021 before the D.B.

Appellant Deposited
Security & Process Fee

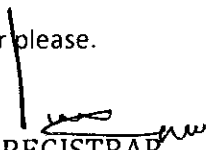




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 514 /2021 21

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|------------|---|--|
| 1 | 2 | 3 |
| 1- | 07/01/2021 | <p>The appeal of Mr. Jehanzeb Khan presented today by Mr. Muhammad Arif Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> |
| 2- | | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>15/02/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p> |
| 15.02.2021 |  | <p>The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 03.06.2021.</p> <p style="text-align: right;"> Reader</p> |

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

S.A.No. 514 /2021

Jehanzeb Khan PET

.....Appellant

VERSUS

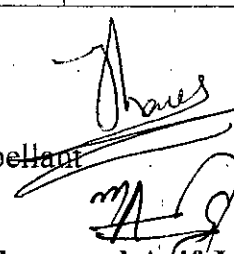
Accountant General and others.....Respondents

I N D E X

| S# | Description of documents. | Annexure | Pages. |
|----|---|----------|--------|
| 1. | Service Appeal with affidavit | | 1-3 |
| 2. | Addresses of the parties. | | 4 |
| 3. | Copy of appointment order alongwith service book with Better copy | A | 5-22 |
| 4. | Copy of departmental appeal | B | 23-24 |
| 5. | Copy of 2 nd departmental appeal | C | 25 |
| 6. | Wakalatnama | | 26 |

Appellant

Through


Muhammad Arif Jan
Advocate High Court
0333-2212213

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE
TRIBUNAL, PESHAWAR

S.A.No. _____/2021

Jéhanzeb Khan PET Government Middle School Serto Kiyal Lower Kohistan.

.....Appellant

VERSUS

1. Accountant General Khyber Pakhtunkhwa, Peshawar Cantt.
2. District Accounts Officer, District Lower Kohistan.
3. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
4. Director (E & SE), Khyber Pakhtunkhwa, Near Govt. High School No.1, G.T Road, Peshawar.
5. District Education Officer (M), District Kohistan

.....Respondents

*Appeal u/s 4 of the KP Service Tribunal Act, 1974
against the act, omission and commission of the
respondents concerned by way of depriving the
appellant from his service benefit (monthly
salaries along with other service benefits) being
entitled in all respect for which the appellant filed
departmental appeal before respondent No.4
which is pending till date.*

RESPECTFULLY SHEWETH:-

1. That initially the appellant was appointed against the vacant post of PET vide order dated 05.04.1999 and was posted at GMS Mazoo Pattan, by the Selection Committee after fulfilling all the codal formalities. (Copy of appointment order alongwith service book are Annex "A")
2. That the appellant served the department with full devotion and determination and to the entire satisfaction of his superiors and have been transferred time to time at different schools.
3. That the appellant was finally posted at GMS Serto Kiyal where the appellant regularly attended the school and performed his duties.

2

4. That without any reason and justification, the monthly salaries of the appellant have been attached since the year 2010 against which the appellant filed departmental appeal before respondent No-4 but of no avail. (Copy of departmental appeal is attached as ANNEX-B).
5. That the appellant asked for time and again but every time, the appellant was assured with the delaying tactics.
6. That the appellant also filed an appeal before respondent No-3 but pending disposal till date. (Copy of appeal is attached as ANNEX-C).
7. That after lapse of statutory time, the department appeal was not disposed-of, hence the appellant approaches this hon'ble Court on the following amongst other grounds:-

GROUNDS

- A. Because the act, omission and commission of the respondents by way of depriving the appellant from his legal and fundamental right of monthly pay and service benefits for which the appellant is entitled in all respects is patently illegal, unlawful, without lawful authority of no legal effect, hence the respondents be directed to release the monthly salaries with all the due amounts to the appellant without any further delay reason and justification.
- B. Because grievances in respect of monthly salaries along with other service benefits is/ was recurring cause consequently limitation could not come in the way of such relief, reliance is placed in the case of "Abdul Jabbar Vs. GM Railway" in reported judgment of **2018 SCMR 64**. But the respondents knowingly the facts intentionally ignored deprived the appellant from his basic and fundamental right and this act of the respondents is amounts to abuse of law.
- C. Because no departmental proceeding has been initiated against the appellant nor any inquiry has been held into the matter moreover no any final order has been passed against the appellant hence in alternate the appellant is also entitled for pension and pensionary benefits and in this respect the guidelines also mentioned and delivered to all concerned in the reported judgment of august Supreme Court of Pakistan "**PLD 2007 SC 35**", have also been ignored by the authority concerned, hence invites consideration of this hon'ble Tribunal.
- D. Because the parent department has got no objection upon the release of monthly pay, allowances and other service benefits etc, but respondent No.1 & 2 intentionally have been attached/stopped the monthly salary along with all other service benefits which is misuse of powers hence invites consideration of this Hon'ble Tribunal.
- E. Because appellant has served the Govt. Department on regular basis for a long period of about 20 years, but due to the acts, commission and omission of the respondents, the appellant has been deprived from his legal and lawful right of service, pay, allowance and

pension and pensionary benefits, which is amounts to abuse of process of law

- F. Because the respondents are bound down under the law to release and pay the monthly salaries alongwith all allowances and further the respondents be directed to allow the appellant to keep and continue his duties, without any delay, reason and justification and in alternate the appellant may kindly be pay his full emolument for his served period of 20 years for which he is entitled in all respect, but the respondents intentionally deprived the appellant with their dishonest attitude, hence this act of the respondents is against the principle of natural justice.
- G. Because the appellant is a poor man and the only bread winner of his whole family moreover and have no other source of income except the monthly salaries to feed the mouths of his whole family.
- H. That any other relief, which has not been specifically asked for may kindly also be granted in favor of appellant.

It is, therefore humbly prayed that, on acceptance of this appeal, the respondents may graciously be directed to release and pay all the outstanding monthly salaries alongwith all other service benefits since the year, 2010 up till now.

In alternate the respondents may also be directed to prepare and process the pension and pensionary documents of the appellant and to pay him his all dues in shape of monthly pension alongwith all gratuities / emoluments in lum sum as the appellant served the department for about 20 years without any further delay, reason and justification.

Any other relief deemed fit may also be graciously granted.

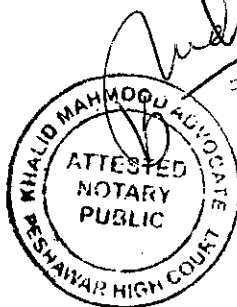
[Signature]
Appellant

Through

[Signature]
Muhammad Arif Jan
Advocate High Court

AFFIDAVIT

I, do hereby, solemnly declare on oath that the contents of the **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.



DEPONENT

[Signature]

4

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

S.A.No. _____/2021

Jehanzeb Khan PET

.....Appellant

VERSUS

Accountant General and others.....Respondents


MEMO OF ADDRESSES

APPELLANT

Jehanzeb Khan PET Government Middle School Serto Kiyal Lower Kohistan.

RESPONDENTS

1. Accountant General Khyber Pakhtunkhwa, Peshawar Cantt.
2. District Accounts Officer, District Lower Kohistan.
3. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
4. Director (E & SE), Khyber Pakhtunkhwa, Near Govt. High School No.1, G.T Road, Peshawar.
5. District Education Officer (M), District Kohistan

Through Appellant

Muhammad Arif Jan
Advocate High Court

Consequent upon the Selection by District Selection Committee in the light of interview held on 17.2.1999, the following P.E.T (Male) untrained candidates are hereby appointed on PET posts at the School noted against each their names in BPS-9 (No:1605-97-3060) plus usual allowances as due and admissible under the rules in the interest of public service w.e.f the date of their taking over charge.

| S.No. | Name/Father's Name and address | Merit position | School where appointed. | Remarks. |
|-------|--|----------------|----------------------------|---------------|
| 01. | Abdul Wakil S/O Lal Khan J/C GHS Dagan Kohistan. | 32 | PET GMS Gujar Banda Kh: | Agv/PET post. |
| 02. | Fazli Akbar S/O Said Faqir R/O Seo Kohistan. | 31.5 | PET GMS Achpidar Kh: | do |
| 03. | Israfil S/O Juma Said R/O Komila Kohistan. | 30.6 | PET GMS Dachu Kh: | do |
| 04. | Mohd Qasim S/O Muzamil R/O Seo Kohistan. | 30.3 | GMS Kafar Banda | do |
| 05. | Mohd Jemur S/O Pakhtoon R/O Shatal Kohistan. | 30.1 | GMS Jumar Kh: Bala. | do |
| 06. | Zahid Malik S/O Kamir Shah R/O Shatal Kohistan. | 29.4 | GMS Bazeen Kh: | do |
| 07. | Abdur Rehman S/O Arbab Khan R/O Jalkot Kohistan. | 28.9 | GMS Thial Kh: | do |
| 08. | Shah Nazar S/O Dusham Khan R/O Jijal Kohistan. | 28.4 | GMS Kolai Kh: | do |
| 09. | Sirajul Haq S/O Malik Samandar R/O Jalkot Kohistan. | 28.2 | GMS Goshali Kh: | do |
| 10. | Dadar Alam S/O Sheikh Hussain R/O Palas Kohistan. | 28.1 | GMS Jabba Kh:Khel | do |
| 11. | Saiful Amir S/O Taib Khan R/O Matara Kohistan. | 27.9 | GMS Gila Kolai Kh: | do |
| 12. | Hanayun S/O Lala R/O Pattan Kohistan, J/C GHSS Pattan | 27.8 | GMS Salgan Kh: | do |
| 13. | Dider Shah S/O Abdul Hakim R/O Kondia Kohistan. | 27.7 | GMS Bala Kh:Sebral | do |
| 14. | Abdur Rehman S/O Fazal Ahmad R/O Seo Kohistan. | 27.1 | GMS Nazaka Kh: | do |
| 15. | Abdur Khan S/O Malik Qasim R/O Palas Kohistan. | 26.8 | GMS Shikhan Abad | do |
| 16. | Farooq Zeb S/O Amant Mulk R/O Dubair Kohistan. | 26.6 | GMS Sangal Kh: | do |
| 17. | Mohd Mohd S/O Yaqoob R/O Seo Kohistan. | 26.1 | GMS Palas Kh: | do |
| 18. | Mohd Anam S/O Hawab R/O Bazeen Kohistan. | 25.8 | GMS Harban Kh: | do |
| 19. | Abdul Salam S/O Ghulam Ali R/O Choochang Kohistan. | 25.7 | GMS Choochang Kh: | do |
| 20. | Shah Zarin S/O Abdul Hauid R/O Jijal Kohistan. | 25.3 | GMS Haran Abad Kh: | do |
| 21. | Waliur Rehman S/O Dost Mohd R/O Sherakot Kohistan. | 24.7 | GMS Badakot Kh: | do |
| 22. | Mohd Ali S/O Malik Samandar R/O Jalkot Kohistan. | 24.1 | GMS Goshi Kh: | do |

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23 (6)

| | | |
|--|------|--------------------------|
| 23. Mohd Huda S/O Hamzat Mian R/O Jalkot Kohistan. | 24.1 | GMS Paragan KH: Ag:V/Pet |
| 24. Muzaffar S/O Amir Wahid S/O Jalkot Kohistan, J/C SP Office. | 24 | GMS Pechh Dala KH do |
| 25. Abdul Manan S/O Sabar Khan R/O Jalkot Kohistan. | 23.8 | GMS Jalkot KH: do |
| 26. Jahan Zeb S/O Yaqub R/O Pattan Kohistan | 23.8 | GMS Mazoo Pattan KH: do |
| 27. Dolatana Khan S/O Abdul Shakoor R/O Kayal Kohistan. | 23.4 | GMS Swarsteel KH: do |
| 28. Gulab Khan S/O Bicha Khan R/O Shatial Kohistan. | 22.9 | GMS Shatial Vill: do |
| 29. Fazal Samad S/O Sheikhal Tolan R/O Ranolia Kohistan. | 22.9 | GMS K:Kalay Ranolia do |
| 30. Abdul Mateen S/O Fazal Noor R/O Kandia Kohistan | 22.7 | GMS Bariyar KH: do |
| 31. Khan Zeb S/O Malik Samandar R/O Kandia Kohistan. | 22.5 | GMS Illil KH: do |
| 32. Khan Bacha S/O Aftab Malik R/O Kandia Kohistan. | 21.7 | GMS Dooni Seer KH: do |
| 33. Mohd Karana S/O Karim Dad R/O Seo Kohistan. | 21.4 | GMS Karung KH: do |
| 34. Darul Uloom S/O Noor Aftab R/O Dubair Kohistan. | 21.1 | GMS Charri Shah: do |

TERMS & CONDITIONS:

1. They will be governed by the such rules and regulations as may be prescribed by the Govt: from time to time for the category of the Govt. servant to which they belong.
2. Their services will be liable to termination on one month, a notice from either side. In case of resignation without notice one month, a pay will be forfeited in lieu of thereof.
3. They shall join the posts within one month from the issue of this order.
4. Charge report should be sent to all concerned.
5. They are required to produce their Health and Age certificate from DRO Kohistan.
6. Their Original certificate/Degrees should be checked and verified from the concerned Board/University before handing over charge.
7. Charge will not be handed over to over age candidates.
8. Their services will be terminated on arrival of Trained PETS.

3. If any candidate found bogus through investigation his name shall automatically be cancelled as cancelled by will be cancelled and all his previous work will be taken against (GHULAM JELANI)

Headmaster (1409-1410) Dt: 5/6/99. DISTRICT EDUCATION OFFICER (M) SECONDARY KOHISTAN.

- Copy to:
1. The Director of Secondary Education MFP, Peshawar.
 2. The District Accounts Officer Kohistan.
 3. All the concerned Headmasters.
 4. The above mentioned candidates.
 5. Counter Local Office.
 6. For order file.

Interview Committee members
Abdusshahid
Wahid
Prof. M. Iqbal

Ghulam Jelani
 DISTRICT EDUCATION OFFICER
 (MFP) SECONDARY KOHISTAN.

7

OFFICE ORDER NO _____
DATED DASSU THE _____/99

OFFICE ORDER.

Consequent upon the selection by District Selection Committee in the light of interview held on 17.02.1999, the following P.E.T (Male) untrained candidates are hereby appointed on PET posts at the School noted against each their names in BPS-9 (Rs.1605-97-3060) plus usual allowances as due and admissible under the rules in the interest of public service w.e.f the date of their taking over charge.

| S.No. | Name/Father Name and Address | Merit Position | School where appointed | Remarks |
|-------|---|----------------|-------------------------|----------------|
| 01 | Abdul Wakil S/o Lal Khan J/C GHS Dosen Kohistan | 32 | PET GMS Gujar Banda KH: | Ag:V/PET Post. |
| 02 | Fazli Akbar S/o Said Faqir R/o Seo Kohistan | 31.5 | PET GMS Ashpidar KH: | do |
| 03 | Ismail S/o Juma Said R/o Komila Kohistan. | 30.6 | PET GMS Dassu KH: | Do |
| 04 | Mohd Qasim S/o Muzammil R/o Seo Kohistan. | 30.3 | GMS Kaffar Banda | Do |
| 05 | Mohd Jenan S/o Pakhtoon R/o Shatial Kohistan. | 30.1 | GMS Jamuru KH: Male | Do |
| 06 | Zahid Malik S/o Faqir Shah R/o Shatial Kohistan. | 29.4 | GMS Sazeen KH: | Do |
| 07 | Abdur Rehman S/o Arbab Khan R/o Jalkot Kohistan. | 28.9 | GMS Thial KH: | Do |
| 08 | Shah Nazar S/o Dhusham Khan R/o Jijal Kohistan. | 28.4 | GMS Kolai KH: | Do |
| 09 | Sirajul Haq S/o Malik Samandar Khan R/o Jalkot Kohistan. | 28.2 | GMS Goshali KH: | Do |
| 10 | Badar Alam S/o Sheikh Hussain R/o Palas Kohistan. | 28.1 | GMS Jabba Khel | Do |
| 11 | Shariful Amir S/o Taib khan R/o Batara Kohistan. | 27.9 | GMS Kulal KH: | Do |
| 12 | Hamayun S/o Laiq R/o Pattan Kohistan J/C GHSS Pattan | 27.8 | GMS Galgan KH: | Do |
| 13 | Didar Shah S/o Abdul Hakim R/o Kandia Kohistan. | 27.7 | GMS Mula Khel abral | Do |
| 14 | Abdul Rehman S/o Fazal Ahmad R/o Seo Kohistan. | 27.1 | GMS | Do |
| 15 | Asghar Khan S/o Malik Qasim R/o Palas Kohistan. | 26.8 | GMS Shalken Abad | Do |
| 16 | Aurang Zeb S/o Aman ul MulR/o Dubair Kohistan. | 26.6 | GMS Surgul KH: | Do |
| 17 | Sher Mohd S/o Umardad R/o Seo Kohistan. | 26.1 | GMS.....KH: | Do |
| 18 | Mohd Aman S/o Nawab R/o Sazeen Kohistan. | 25.8 | GMS Harban KH: | Do |
| 19 | Abdul Salam S/o Ghulam Ali R/o Chooshang Kohistan. | 25.7 | GMS Chooshang KH: | Do |
| 20 | Shah Zarin S/o Abdul Hamid R/o Jijal Kohistan. | 25.3 | GMS Hakeem Abad KH: | Do |
| 21 | Wail ur Rehman S/o Dost Mohd R/o Sherakot Kohistan. | 24.7 | GMS Badakot KH: | Do |
| 22 | Hazrat Ali S/o Malik Samandar Khan R/o Jalkot Kohistan. | 24.1 | GMS.....KH: | Do |

Handwritten initials/signature

| | | | | |
|----|-----------------------------------|------|----------------------|-----------------------|
| 23 | Mohd Sharif S/o | 24.1 | GMS Purangari KH: | Ag: V/PET Posts |
| | R/o | | | Do |
| 24 | S/o Amir Wahid | 24 | GMS Peech Bala KH: | Do |
| | R/o Jijal Kohistan. J/c SP office | | | |
| 25 | Abdul Manan S/o Babar Khan | 23.8 | GMS Jalkot KH: | Do |
| | R/o Jalkot Kohistan. | | | |
| 26 | Jehan Zeb S/o Yardad R/o Pattan | 23.8 | GMS Mazoo Pattan KH: | Do |
| | Kohistan. | | | |
| 27 | Dolatana Khan S/o Abdul | 23.4 | GMS Swarsteel KH: | Do |
| | Shakoor R/o Kayal Kohistan. | | | |
| 28 | Gulab Khan S/o Nicha Khan R/o | 22.9 | GMS Shatial Vill: | Do |
| | Shatial Kohistan. | | | |
| 29 | Fazal Samad S/o Sheikhu Islam | 22.9 | GMS Kikalay Ranolia | Do |
| | R/o Ranolia Kohistan. | | | |
| 30 | Abdul Mateen S/o Fazal Noor | 22.7 | GMS Barlyar KH: | Do |
| | R/o Kandia Kohistan. | | | |
| 31 | Khan Zeb S/o Malik Samandar | 22.5 | GMS Illil KH: | Do |
| | R/o Kandia Kohistan. | | | |
| 32 | Khan Bacha S/o Aftab Malik R/o | 21.7 | GMS Doomi Seer KH: | Do |
| | Kandia Kohistan. | | | |
| 33 | Mohd Murtaza S/o Karim Dad | 21.4 | GMS Karang KH: | Do |
| | R/o Seo Kohistan. | | | |
| 34 | Darul Uloom S/o Noor Aftab R/o | 21.1 | GMS Charri Shab: | Do |
| | Dubair Kohistan. | | | |

TERMS & CONDITIONS:

1. They will governed by the Shah rules and regulations as may be prescribed by the Govt: from time to time for the category of the Govt: servant to which they belong.
2. Their services will be liable to termination on one month, a notice from either side. In case of resignation without notice one month, a pay will be forfeited in lieu of thereof.
3. They will join the posts within one month from the issue of this order.
4. Charge report should be sent to all concerned.
5. They are required to produce their Health and Age certificates from DRO Kohistan.
6. Their original certificate/degree should be checked and verified from the concerned Board/University before taking over charge.
7. Charge will not be handed over to over age candidates.
8. Their services will be terminated on arrival of Trained PETs.
9. If..... of the candidate found bogus through verification his will be considered as cancelled and pay will be cancelled and will be taken against them.

(GHULAM JELANT)

DISTRICT EDUCATION OFFICER (M)



Endst: No. 1408-1643 Dt: 5.4.99

SECONDARY KOHISTAN

Copy forwarded to :-

1. The Director of Secondary Education NWFP, Peshawar.
2. The District Account Officer Kohistan.
- 3-37 All the concerned Headmasters.
- 38-71 All the above mentioned candidates.
72. Local Office.
73. Order file.

DISTRICT EDUCATION OFFICER
(H&F) SECONDARY KOHISTAN

Service Book

9

GPF

11. 4. duveth. 2701/15

00340516

SERVICE BOOK

PET

Dated 18.8.99

OF

Mr. محمد جہانزیب آفرین سناؤ کوٹہ
MR. Jhanzab of Patton Dist 15000
MR. Jhanzab of Patton Kohat

مدت ہوئی پچھڑے ہوئے ایک شخص کو سبک
آج بھی درو دیوار پر خوشبو کا اثر ہے

14/9/2001

GS & PD. NWFP. — 498 PB — 50,000 B. — 12.8.92 (4)

Price : Rs. 5-00

Handwritten initials/signature

(For use in Police Department only).

(1) S.S.C

(2) FA

1. Passed S.S.C examination from B.I.S.E. Abbottabad under roll No. 16567 (Annual) held in 1994, obtained marks 415/850 X

Passed F.A examination from B.I.S.E. Abbottabad under roll No 8869 (Supp) held in 1993, obtained marks 513/1100 ✓

Chulomphlu
DISTRICT EDUCATION OFFICER
General Secretary Abbottabad

Chulomphlu
DISTRICT EDUCATION OFFICER
General Secretary Abbottabad

(3) Verification Roll No. P.F.T dated 19-11-02 received back
~~as per verification from conducted~~
 Passed P.F.T examination from R.D.E Education Department NWFP. Roll No. 185. Marks obtained 485/1060 held in 2001.
 R.D. on 31-3-02. Left thumb-impression. *Uttman*

B.A.

(4) Passed B.A Exam, Allama Iqbal Open University Islamabad DO
 Serial 2005, under roll No: L4185002 & marks obtained
 496/900 (Percentage (55.1) Grade (C), & Result declared on 15/8/2006

| Qualification | Date | Qualifications | Date |
|-------------------|------|-----------------------------------|------|
| English | | First Arts | Do. |
| Pashtu | | B. L. or B. A. | |
| Urdu | | Pledership examination | |
| Plan-drawing | | Training School Final examination | |
| Finger print | | Other qualifications— | |
| Drill instructing | | | |
| Court duties | | | |
| Reserve duties | | | |

Utt

N.B.—Line to be drawn under the qualification possessed.

Utt

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

7
not
add
1/15

1. Name Jehan Zeb

2. Race Basko Khel

3. Residence village & P.O. Pattan and Tehsil
Pattan District - Kohistan

12

4. Father's name and residence Yes Dad

17
19/10/1974

5. Date of birth by Christian era as nearly as can be ascertained 06-04-1974 ✓

15
8
2006

6. Exact height by measurement 5-3

7. Personal marks for identification

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger.

Ring Finger

Middle Finger.

Fore Finger

Thumb.

9. Signature of Government servant

J. Zeb

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

Amal Singh
District Registrar
District Kohistan

ATC
JZ

| 1 Name of Post | 2 Whether substantive or officiating and whether permanent or temporary | 3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 311 C.S.R. | 4 Pay in substantive Post | 5 Additional Pay for officiating | 6 Other emolument falling under the term "Pay" | 7 Date of Appointment | 8 Signature of Government Secretary | 9 Signature of the official in the column |
|--|--|--|------------------------------|-------------------------------------|---|--------------------------|--|--|
| P.E.T G.M.S Muzer Duttan | ✓ | BPS-9 (Rs. 1605-97-3860) | Rs. 1605/- | | | 6/4/88 | Jha | |
| Physician 1989 | | | Rs. 1165/- | | | 1/12/88 | Jha | |
| P.E.T G.M.S. Gyan Bandy Muzer Duttan | | | B. 1605/- | | | 1/9/2000 | Jha | |
| --- | | | B. 1605/- | | | 12/5/2000 | Jha | |
| --- | | | B2. 1605/- | | | 1/12/2001 | Jha | |
| --- | | R.BPS-9 (Rs. 2410-145-6760) | | | | | Jha | |
| --- | | | B2 2410/- PM | | | 1/12/2001 | Jha | |
| --- | | | B2 2410/- | | | 31/3/02 | Jha | |
| --- | | | B2 2555/- | | | 1/12/2002 | Jha | |
| --- | | | B2 2700/- | | | 1/12/2003 | Jha | |
| --- | | | 2845/- | | | 1/10/04 | Jha | |
| --- | | BPS-9 (2770+165-7720) | 3265/- | | | 1/7/05 | Jha | |
| --- | | | 3430/- | | | 1/12/05 | Jha | |

| 8 | 9 | 10 | 11 | 12 | 13 | | 14 | 15 | | | | | |
|--------|-------------------------------|------------|------------|---|--|---|----|----|--|--|------------------------------------|---|--|
| | | | | | Signature and designation of the head of the office or other attesting officer in columns 1 to 8 | Date of termination of appointment | | | Reason of termination (such as promotion, transfer, dismissal, etc.) | Signature of the head of the office or other attesting Officer | Nature and duration of leave taken | Leave | |
| | | | | | | | | | | | | Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government | Signature of the head of the office or other attesting officer |
| Period | Government to which debitable | | | | | | | | | | | | |
| | <i>Chulanga</i> | 30/11/99 | Fixed | <i>Chulanga</i> | | Appointed as P.T. Teacher - B.P.S. 9 - P.O. (1605-97-3660) plus used a Economics as other post and attributable amount | | | | | | | |
| | <i>Chulanga</i> | 31/12/2000 | Transf | D.E.O. (M) Secy Kohistan | | The rules were D.E.O. (M) Secondary Education under Govt No 1688-63 | | | | | | | |
| | <i>Chulanga</i> | 30/11/2000 | Fixed | D.E.O. (M) Secy Kohistan | | Dates 05-04-1999 | | | | | | | |
| | <i>Chulanga</i> | 30/11/2000 | R.B.P.S | D.E.O. (M) Secy Kohistan | | cutting attested | | | | | | | |
| | <i>Chulanga</i> | 30/11/2001 | Fixed | <i>Chulanga</i> | | service verified with 6-6-88 | | | | | | | |
| | <i>Chulanga</i> | | | <i>Chulanga</i> | | 30-11-88 | | | | | | | |
| | <i>Chulanga</i> | | | <i>Chulanga</i> | | other office records kept in this office | | | | | | | |
| | <i>Chulanga</i> | | | <i>Chulanga</i> | | service verified with 1-12-2000 | | | | | | | |
| | <i>Chulanga</i> | | | <i>Chulanga</i> | | 30-11-2000 from other office records | | | | | | | |
| | <i>Chulanga</i> | 30/11/02 | Entered by | Attmarin District Officer (M) S & L, District Kohistan | | District Education Officer (M/F) Secondary Education Kohistan | | | | | | | |
| | <i>Attmarin</i> | 30/11/2002 | A/G | <i>Attmarin</i> District Officer (M) S & L, District Kohistan | | Service verified with 1-12-2001 to 30-11-2001 from Aeg. Rolls & other record of this office. | | | | | | | |
| | <i>Attmarin</i> | 30/11/2003 | A/R | <i>Attmarin</i> District Officer (M) S & L, District Kohistan | | <i>Chulanga</i> E.D.O. Edu. & Lit. Distt: Kohistan | | | | | | | |
| | <i>Attmarin</i> | 30/11/04 | A/M | <i>Attmarin</i> District Officer (M) S & L, District Kohistan | | Allowed to travel for passing of P.T. Examination with 31-3-02 in B.P.S. 9 vide E.D.O (S & L) Kohistan and Govt No 41-43 Date 13-1-03 | | | | | | | |
| | <i>Attmarin</i> | 30/11/05 | S/R | <i>Attmarin</i> District Officer (M) S & L, District Kohistan | | <i>Attmarin</i> District Officer (M) S & L, District Kohistan | | | | | | | |
| | <i>Attmarin</i> | 30/11/05 | A/L | <i>Attmarin</i> District Officer (M) S & L, District Kohistan | | Service verified with 1-12-2000 to 30-11-2002 from Aeg. Rolls & other record of this office | | | | | | | |
| | <i>Attmarin</i> | 30/11/2000 | Int | <i>Attmarin</i> District Officer (M) S & L, District Kohistan | | <i>Attmarin</i> District Officer (M) S & L, District Kohistan | | | | | | | |

Attmarin

| 1 Name of Post | 2 Whether substantive or officiating and whether permanent or temporary | 3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R. | 4 Pay in substantive Post | 5 Additional Pay for officiating | 6 Other emolument falling under the term "Pay" | 7 Date of Appointment | 8 Signature of Government Sec |
|--|--|--|------------------------------|-------------------------------------|---|--------------------------|----------------------------------|
| gms G. Banda. | | PS | | 3585/- | | 12/06 | <u>Jhan</u> |
| <p>2001 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P. PESHAWAR. PAY FIXED IN THE REVISED BASIC PAY SCALES 2001</p> <p>OF RS. 2410-45-6760(9) AT RS. 2410/- P.M. 1-12-2001 With Next Increment on 1-12-2002</p> <p><u>M. Shah</u> Accounts Officer Pay Fixation Party N.W.F.P. Peshawar</p> | | | | | | | |
| <p>2005 Office of The Accountant General N.W.F.P. Peshawar PAY FIXED IN THE REVISED BASIC PAY SCALES 2005</p> <p>OF RS. 2770-165-7720(9) AT RS. 3265/- P.M. 1-7-2005 With Next Increment on 1-7-2005</p> <p><u>M. Shah</u> Accounts Officer Pay Fixation Party N.W.F.P. Peshawar</p> | | | | | | | |
| <p>Revised BPS 9 (3185-190-8385)</p> | | | | | | | |
| <p>4135/- 12/07 <u>Jhan</u></p> | | | | | | | |
| <p>4325/- 11/07 <u>Jhan</u></p> | | | | | | | |
| <p>Revised BPS 9 (3820-230-10720-)</p> | | | | | | | |
| <p>5200/- 12/08 <u>Jhan</u></p> | | | | | | | |
| <p>5430/- 11/08 <u>Jhan</u></p> | | | | | | | |

| 1 Name of Post | 2 Whether substantive or officiating and whether permanent or temporary | 3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R. | 4 Pay in substantive Post | 5 Additional Pay for officiating | 6 Other emolument falling under the term "Pay" | 7 Date of Appointment | 8 Signature of Government Secretary | 9 Designation of all |
|-------------------|--|--|------------------------------|-------------------------------------|---|---------------------------------|--|-------------------------|
| PE-1 | | | | | | | | |
| GMS, (KMU) | | | | | | | | |
| | | BPS-14 (3565-275-11815-) | | | | | | |
| -A- | Prinlt - | - | 3565/- | - | - | 15 ⁸ / ₀₆ | <u>Jha</u> | |
| -A- | -A- | - | 3565/- | - | - | 1 ¹² / ₀₆ | <u>Jha</u> | |
| | | Revised BPS-14 (4100-315-13550-) | | | | | | |
| -A- | -A- | - | 4100/- | - | - | 12 ⁰⁷ | <u>Jha</u> | |
| -A- | -A- | - | 4415/- | - | - | 1 ¹² / ₀₇ | <u>Jha</u> | |
| | | Revised BPS-14 (4920-380-16320-) | | | | | | |
| -A- | -A- | - | 5300/- | - | - | 1 ⁷ / ₀₈ | <u>Jha</u> | |
| -A- | -A- | - | 5680/- | - | - | 1 ¹² / ₀₈ | <u>Jha</u> | |
| | | BPS-15 (4350-350-14850-) | | | | | | |
| -A- | -A- | - | 4700/- | - | - | 2 ¹² / ₀₇ | <u>Jha</u> | |
| | | Revised BPS-15 (5220-420-17820-) | | | | | | |
| -A- | -A- | - | 5640/- | - | - | 1 ⁷ / ₀₈ | <u>Jha</u> | |
| -A- | -A- | - | 6060/- | - | - | 1 ¹⁴ / ₀₈ | <u>Jha</u> | |

CAL
BT

| 8 | 9 | 10 | 11 | 12 | 13 | | 14 | 15 |
|---|------------------------------------|--|--|---|------------------------------------|---|--|----|
| | | | | | Nature and duration of leave taken | Leave | | |
| | | | | | | Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | Date of termination of appointment | Reason of termination (such as promotion, transfer, dismissal, etc.) | Signature of the head of the office or other attesting Officer | Period | Government to which debitable | Signature of the head of the office or other attesting officer | Reference to recorded punish or censure, or re or praise of Government Service | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-11-2006 | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | | | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-6-2007 | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | | | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-11-2007 | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | | | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-6-2008 | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | | | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-11-2008 | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | Distt Officer (S&L) Distt Kohistan | | | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-4-2009 | Distt Officer (E&S) Edu Kohistan at Derasu | Distt Officer (E&S) Edu Kohistan at Derasu | Distt Officer (E&S) Edu Kohistan at Derasu | | | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-6-2008 | Distt Officer (E&S) Edu Kohistan at Derasu | Distt Officer (E&S) Edu Kohistan at Derasu | Distt Officer (E&S) Edu Kohistan at Derasu | | | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-11-2008 | Distt Officer (E&S) Edu Kohistan at Derasu | Distt Officer (E&S) Edu Kohistan at Derasu | Distt Officer (E&S) Edu Kohistan at Derasu | | | | |
| Signature of the head of the office or other attesting officer in columns 1 to 8 | 30-11-2009 | Distt Officer (E&S) Edu Kohistan at Derasu | Distt Officer (E&S) Edu Kohistan at Derasu | Distt Officer (E&S) Edu Kohistan at Derasu | | | | |

(See next page)

ATC
B

Period PET. No. 31-3-2002 (Central Board 2002)

B.A. 15-8-2006. Ind:

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|---|---|--|-------------------------|--------------------------------|--|---------------------|---------------------------------|
| Name of Post | Whether substantive or officiating and whether permanent or temporary | If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R. 15 | Pay in substantive Post | Additional Pay for officiating | Other emolument falling under the term "Pay" | Date of Appointment | Signature of Government Servant |
| PET | | | | | | | |
| E.M.S. (K.H.) | Perth: | | | 6485/- | | 1/12/99 | |
| <p>Entry Remand due to allowing the Benefit of Annual Grant major central Period Grant w/d date of B.A. Appointment in the light of Supreme Court Judgment.</p> | | | | | | | |
| A - | A - | BPS No. 9 (1605-97-3060) | 1605/- | | | 6/4/99 | |
| A - | A - | | 1702/- | | | 1/12/99 | |
| A - | A - | | 1799/- | | | 1/12/2000 | |
| A - | A - | | 1896/- | | | 1/12/2001 | |
| <p>1-12-2001 (Revised Scale BPS No. 9 (2410-145-6760))</p> | | | | | | | |
| A 31-3-2002 | A - | | 2845/- | | | 1/12/2001 | |
| Period PET. No. - | A - | | 2845/- | | | 31/3/2002 | |
| A - | A - | | 2990/- | | | 1/12/2002 | |
| A - | A - | | 3135/- | | | 1/12/2003 | |
| A - | A - | | 3280/- | | | 1/12/2004 | |
| - | - | - | - | (Entry see next page) | | | |

| 8 | 9 | 10 | 11 | 12 | 13 | | 14 | 15 | | | | | |
|---|-----------------|------------------------------------|--|----|--|------------------------------------|----|----|--|--|------------------------------------|--|---|
| | | | | | Signature and designation of the head of the office or other attesting officer in columns 1 to 8 | Date of termination of appointment | | | Reason of termination (such as promotion, transfer, dismissal, etc.) | Signature of the head of the office or other attesting Officer | Nature and duration of leave taken | Leave | |
| | | | | | | | | | | | | Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government | Reference to recorded punish or censure, or praise of Government Se |
| | | | | | Period | Government to which debitale | | | | | | | |
| 7 | ✓ | | Entire Remnd due to Allain... Prind due | ✓ | | | | | | | | | |
| 7 | ✓ | 30 ¹¹ / ₁₉ | Just | ✓ | | | | | | | | | |
| 7 | ✓ | 30 ¹¹ / ₂₀₀₀ | Just | ✓ | | | | | | | | | |
| 7 | ✓ | 30 ¹¹ / ₂₀₀₁ | Just | ✓ | | | | | | | | | |
| 7 | ✓ | 12 ¹² / ₂₀₀₁ | Scale Remnd | ✓ | | | | | | | | | |
| | ✓ | 30 ³ / ₂₀₀₂ | Prind PETER = | ✓ | | | | | | | | | |
| | ✓ | 30 ¹¹ / ₂₀₀₂ | Just | ✓ | | | | | | | | | |
| | ✓ | 30 ¹¹ / ₂₀₀₃ | Just | ✓ | | | | | | | | | |
| | ✓ | 30 ¹¹ / ₂₀₀₄ | Just | ✓ | | | | | | | | | |
| | ✓ | 30 ⁶ / ₂₀₀₅ | Scale Remnd | ✓ | | | | | | | | | |
| | (See next page) | | | | | | | | | | | | |

[Handwritten signature]

Revised entered
 Round quit

(20)

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | Designation of Government Servant |
|--|---|--|-------------------------|--------------------------------|--|---------------------|---------------------------------|-----------------------------------|
| Name of Post | Whether substantive or officiating and whether permanent or temporary | If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 | Pay in substantive Post | Additional Pay for officiating | Other emolument falling under the term "Pay" | Date of Appointment | Signature of Government Servant | |
| PET | 1-7-2005 | (S. Reind BPS No. 9) | 3760/- | 9 | | 7/2005 | [Signature] | |
| GMS, (KH) | Reint: | - | 3760/- | 9 | | 7/2005 | [Signature] | |
| -D- | -D- | - | 3925/- | - | | 12/2005 | [Signature] | |
| 14-8-2006 | 15-8-2006 | (Allowed BPS No. 14) | 4115/- | 14 | | 15/8/2006 | [Signature] | |
| Passed BA Exmi and Div. & allowed BPS-14 | -D- | - | 4115/- | 14 | | 15/8/2006 | [Signature] | |
| A | -D- | - | 4115/- | - | | 12/2006 | [Signature] | |
| -D- | -D- | - | 4730/- | 14 | | 7/2007 | [Signature] | |
| -D- | -D- | - | 5045/- | - | | 12/2007 | [Signature] | |
| -D- | -D- | - | 5050/- | 15 | | 2/12/2007 | [Signature] | |
| -D- | -D- | - | 6060/- | 15 | | 7/2008 | [Signature] | |
| -D- | -D- | - | 6480/- | - | | 12/2008 | [Signature] | |
| -D- | -D- | - | 6900/- | - | | 12/2009 | [Signature] | |

SPC
 [Signature]

21

| Signature and attestation of the head of the office or other attesting officer in columns 1 to 8 | Date of termination of appointment | Reason of termination (such as promotion, transfer, dismissal, etc.) | Signature of the head of the office or other attesting Officer | Leave | | Signature of the head of the office or other attesting officer | Reference to recorded punish or censure, or praise of Government Service | |
|--|------------------------------------|--|--|------------------------------------|---|---|--|-------------------------------|
| | | | | Nature and duration of leave taken | Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government | | | |
| | | | | | Period | | | Government to which debitable |
| Y | 30/11/2005 | Quit | Y | | | Notification issued under Serial No. 1111 | | |
| Y | 14/8/2006 | Promoted BA Ex-cd allowed BPS-14 | Y | | | Allowed/Granted the benefit of Annual Grant w.e.f. date of Appointment in the light of Supreme Court Judgment & Notification issued under Court: of N.W.F.P. Finance Deptt. (Regulation wing) Peshawar under No: F.D.(P.R.C) 5-2/2009 dated 30-3-2009 | | |
| Y | 30/11/2006 | Quit not allowed due to SLT (6-14) | Y | | | (No Arrears Prior to 1-4-2009) | | |
| Y | 30/6/2007 | Scale Revised | | | | | | |
| Y | 30/11/2007 | Quit | Y | | | | | |
| Y | 2/12/2007 | Awards of BPS-15 due to up grade | Y | | | Drawn arrears dt 7/11/07 A Pay & All. due to allowed em-Franco Period met w.e.f 1-4-2007 to 30/6/10 vide T. 434 dt 8-6-10 Rs. 7308/- | | |
| Y | 30/6/2008 | Scale Revised | Y | | | | | |
| Y | 30/11/2008 | Quit | | | | | | |
| Y | 30/11/2009 | Quit | | | | | | |
| Y | | | | | | | | |

2009
 OFFICE OF THE ACCOUNTANT GENERAL
 N.W.F.P. PESHAWAR
 Pay Verified in the Adjustment B.P.S. 2008
 in Light of the Govt. of N.W.F.P.
 Finance Department Notification No. F.D. (P.R.C) 5-2/2002, Dated 30-3-2009
 with No. Arrears upto 30-3-2009
 Pay Scale of Rs. 5210-17828
 Pay Verified Rs. 6480/-
 with Nest Ince. 12-2009

District Account Officer
 PESHAWAR

Account Officer
 Pay Fixation Party
 N.W.F.P. Peshawar

Handwritten signature and initials at the bottom right of the page.

Amer 'B'

(23)

خدمت صاب ڈائریٹیو صاحب محمد تقیم لیسٹ اور

اسیل برائے تنخواہ

صاف علی

مہودیانہ گزاریں ہے، کم میں گورنمنٹ سڈل سکول
Sertokajal کو پستان میں اپنی فراہم احسن طریقہ سے طبیعت
PET سرانجام دے چکا ہوں۔ میرا کوئی قصور نہیں ہے۔ لیکن
میری تنخواہ کو بند کیا ہے۔ اور اکاؤنٹس والے تنخواہ میں

بھیج دیا ہے

لہذا محض بانی فرمائے کہ میرے تنخواہ کے جاری وادائیگی
کے احکامات صادر فرمائے جاؤں

میں مشکور رہوں گا

الموقع ۳
۲۰۱۱

آپ کا اعداد

صائب خان پی ای ٹی
GMS سٹیڈیو کو پستان

MS
R

24

To,

The Director (ESSE) KP,
Near GHS No-1, Peshawar.

Application/ Appeal for Release of Monthly
Salaries and other Service benefits.

Respected Sir,

Most humbly submitted, that I was appointed as PET in District Kohistan and had served uptill now, but my monthly Salaries have been attached by account office. I have filed different applications, but now I am near to retirement, hence release and pay my outstanding salaries along with all other service benefits.

Dated: - 30-09-2020.

Your obediently

Jehanzeb ~~Khan~~ Khan

PET GMS Seritokiyal
Lower Kohistan.

CT
R

(کراچی) Amee - C

احکمت جناب سیکرٹری تعلیم ضمنی کھنڈ خواہ لیسٹ اور

درخواست اپیل برائے حکم جاری فرمانے
برائے ادا شلنگی تنخواہ

جناب عالی

سائل حسب ذیل عرض رسان ہوں۔

1. یہ سائل محکمہ تعلیم کوستان لوئر میں کھیت PET اپنی فراغت لیا
Gms Serlokijal اسن لہ لیتے سے سرکام دے چکا ہوں۔
2. یہ کہ سال 2010 میں من سائل کے تنخواہ بند ہو گیا جس کے خلاف کئی درخواستیں
اپیلے لکھ کر چکا ہوں۔ لیکن کوئی شنوائی نہ ہو سکی۔
3. یہ کہ ماہانہ تنخواہ سے علاوہ من سائل ڈیپٹی سیکرٹری کے حقوق
مقررہ پنشن وغیرہ بھی حقدار ہوں۔

لہذا محض رہائی فرما کر میری باقی ماندہ تنخواہ آ جا رہی کرنے اور
ادا شلنگی کے احکامات صادر فرمائیں۔ اور مجھے ڈیپٹی سیکرٹری
مقامات بھی مرحمت فرمائی جاوے۔

صیغہ
جناب عالی خان PET
سیکرٹری تعلیم کوستان
13-06-2015

CTC
A

26

WAKALATNAMA

IN The ICP Service Tribunal, Pesh

Tehanzeb Khan

(Petitioner)
(Plaintiff)
(Applicant)
(Complainant)
(Decree Holder)

VERSUS

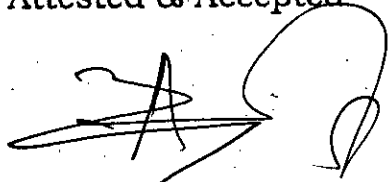
Accountant Zol

(Respondent)
(Defendant)
(Accused)
(Judgment Debtor)

Case _____

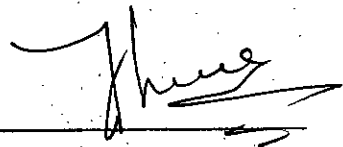
I/We, Tehanzeb Khan do hereby appoint and constitute **Muhammad Arif Jan Advocate** High Court, Peshawar, to appear. Plead, act, compromise, withdraw or refer to arbitration to me/ us as my/ our Counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/ Counsel at my/ our matter.

Attested & Accepted



Muhammad Arif Jan
Advocate, High Court, Peshawar.
Office No. 6, 1st Floor
Pabbi Medical Centre, G.T. Road
Peshawar.
Mobile: 0333-2212213

CLIENT/S



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No
514/2021

JEHANZAIB KHAN PET GMS SERTO KIYAL PATTAN KOHISTAN LOWER

APPELLANT

VERSUS

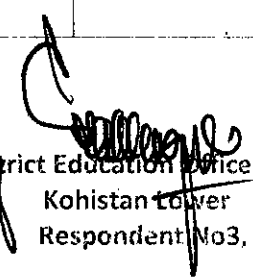
1. Govt. of Khyber Pakhtunkhwa through Secretary E & SE Khyber Pakhtunkhwa, Peshawar.
2. Director E & SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (M) Kohistan Lower
4. Account General Khyber Pakhtunkhwa, Peshawar cant.
5. District Account Officer, District Lower Kohistan.

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.1 to 5

INDEX

| S.No. | Description | Page Nos. | Annexures |
|-------|--|-----------|-------------------|
| 01 | Comment along with Affidavit | 01 to 05 | |
| 02 | All concerned letters are annexed as annexures | 06 to 12 | A,b,c,d,e,f,and g |
| 03 | Letters against the appellant and to election commissioner are annexed | 13 to 14 | H& i |


District Education Officer (M)
Kohistan Lower
Respondent No3, etc.

10

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.
514/2021

JEHANZAIB KHAN PET GMS SERTO KIYAL PATTAN KOHISTAN LOWER

APPELLANT

VERSUS

1. Govt.of Khyber Pakhtunkhwa through Secretary E & SE Khyber Pakhtunkhwa, Peshawar.
2. Director E & SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (M) Kohistan Lower
4. Account General Khyber Pakhtunkhwa, Peshawar cant.
5. District Account Officer, District Lower Kohistan.

Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1 to 5

PRELIMINARY OBJECTIONS

1. That the appellant is not an aggrieved person.
2. That the appellant has been estopped by his own conduct to file the instant appeal.
3. That the appellant has got no cause of action to file the instant appeal.
4. That the appeal is time barred, hence liable to be dismissed
5. That the appellant has come to this Tribunal with unclean hands.
6. That the appeal is not maintainable in the present circumstances of the issue.
7. That the appellant has concealed the material facts from this Honorable tribunal.
8. That the appeal is hit by the principle of laches.
9. That the appellant has hidden himself from the Education Department and school for a long time i.e. More than, 10, years without performing duty.



FACTUAL OBJECTIONS

- 1) That the Para No.1 relates that this office was established in March 2019. No record of the appellant was available in this office. A letter No.8066, dated 20/08/2021, and a Reminder-1 No.8257 dated 06/09/2021, were written to DEO (M) Kohistan Upper about provision of records. The DEO (M) Kohistan Upper has provided a letter No.6446, dated 07/09/2021 with attached photo copies of some service documents in which he stated that his salary was stopped in March 2010. The undersigned once again a letter No.9324, dated 29/09/2021, sent to DEO (M) Kohistan Upper requesting all original record may be provide to this office for submission of comment before the Honorable Service Tribunal Peshawar but still reply is awaited. DEO (M) Kohistan Lower issued a letter for personal hearing Vide letter No.9741, dated, 15/10/2021 to the appellant but no reply is received from the appellant, latter on Inquiry for fact finding was constituted to probe in to the matter through Ends: No.9743-48 dated, 18/10/2021, by the competent authority, The above committee has submitted their report through No.448, dated, 06/11/2021, in which reply has not been submitted by the appellant. (all concerned letters are annexed as annexures ,a,b,c,d,e,f and g)
- 2) That the Para No.2 pertains to record.
- 3) That the Para No.3 is incorrect, no record of duty and attendance at GMS Serto Kiyal was found in the School after February 2008.
- 4) That the Para No.4 is incorrect, no appeal of the appellant is received in this office as well as in respondent NO.4, and only simple application is attached with his^s/appeal.
- 5) That the Para No.5 is incorrect, as he never attended this office nor attended any school as a teacher, nor submitted any application regarding his service since long time i.e. more than 10 years 10 months and 6-days, and he remained busy in his own business. However he attend this office as a contractor regarding handing/ taking of GHS Pattan School building constructed through ERRa and

pressurize the undersigned for handing/taking the incomplete building of GHS Pattan and also Stopped the official vehicle of the undersigned with a huge mob of community members, In this regard a letter No.6604 dated 26/10/2020, has also sent to Deputy Commissioner Kohistan Lower.(Letter against the above appellant is annexed as annexure (h)

- 6) That the Para No, 6 is incorrect, proof is insufficient.
- 7) That the Para No:7 is incorrect; and needs cogent proof.

GROUND:

- a. That the Para "A" of the ground is incorrect, as he is not entitled for monthly pay and benefit as he has hidden himself from the department and School since about last 10 years 10 months and 6-days.
- b. That the Para No. "B" of the ground, pertains to record.
- c. That the Para "C" of the ground is incorrect. The appellant was hidden from department and School since about last 10 years 10 months and 6-days and was busy in his private job and remained absent from his duty.
- d. That the Para No"D" of the ground is incorrect. He remained absent for a long time i.e. last 10 years 10 months and 6-days remained absent, so department is not agree to release his pay and other benefits.
- e. The the Para No"E" of the ground is incorrect. His salary was drawn up to February, 2010; his total service is 10 years 10 months and 26 days only.
- f. That the Para No" F" of the ground is incorrect. He has not been performing his duty since February2008.
- g. That the Para No"G" of the ground is incorrect; the appellant time and again appears in this office as a contractor not as a teacher. The appellant has contested the General Election in the year 2008, In this regard a letter No.8960, dated 16/09/2021, has been sent to the Election Commissioner Kohistan Upper, but reply still awaited.(Letter is annexed as annexure i)

h. That the Para No "H" of the ground is incorrect, due to his long absentee he is not entitled for any benefit.

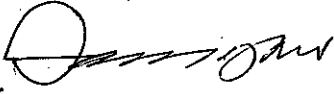
PRAYER:

It is therefore, humbly prayed that on acceptance of the above comments, the instant appeal may kindly be dismissed in the favor of the Respondents in the interest of justice.

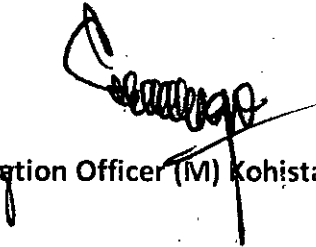
Secretary E & SE KPK Peshawar.....



Director E & SE KPK Peshawar.....



District Education Officer (M) Kohistan Lower.....



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No
514/2021

JEHANZAIB KHAN PET GMS SERTO KIYAL PATTAN KOHISTAN LOWER

APPELLANT

VERSUS

- 1. Govt.of Khyber Pakhtunkhwa through Secretary E & SE Khyber Pakhtunkhwa, Peshawar.
- 2. Director E & SE Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer (M) Kohistan Lower
- 4. Account General Khyber Pakhtunkhwa, Peshawar cant.
- 5. District Account Officer, District Lower Kohistan.

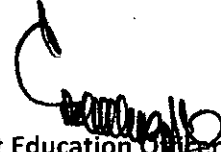
Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.3

Affidavit

I Mr. Hafiz Muhammad Nawaz District Education Officer (M) Kohistan Lower do hereby affirm and declared on oath that contents of forgoing comments are correct and true according to the best of my knowledge, belief and nothing has been concealed from this Honorable Tribunal.

Identified by
Additional Advocate General
Peshawar (Service Tribunal)


District Education Officer (M)
Kohistan Lower
Respondent No.3

(2/1)

(6)

Annexure (a)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHISTAN LOWER**

Email: deokohistan1@gmail.com

Face Book: DEO Male Kohistan Lower



NO 8066 / Liti/F.NO.2 dated KH/L The 20 /08 /2021

To

District Education Officer (M)
Kohistan Upper

Subject: Service Appeal No.514/2021 in R/O Jehanzaib Khan PET

Memo:

Kindly refer to the subject cited above,

It is stated for your kind information that you know this office is established in the month of March 2019, the above named appellant record has not been handed over to this office at the time of trifurcation of District Kohistan. The appellant salary was stopped in the year 2010, as he mentioned in his appeal at Para No.04. At this stage this office is unable to submit the comment in Hon,able Service Tribunal KP Peshawar.

It is therefore, you are required to provide the following records of the above Appellant, so this office may be able to submit the comment in the Honorable Court well in time i.e.10/09/2021, being court matter, you are requested to provide the record through special Messenger on or before 10/09/2021; record detail is as under Please.

1. Cutting of advertisement
2. Merit list (copy)
3. DSC Minutes (COPY)
4. Original Service Book
5. Salary Stoppage Letter
6. Any action taken by Department
7. All record about the appellant up to March, 2019 May please be provided,

Ends' No. 8067

[Signature]
20/8/21
DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER

Copy of the above is forwarded for information to the:
1.Registrar Service Tribunal Peshawar

[Signature]
DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER

(B.P)

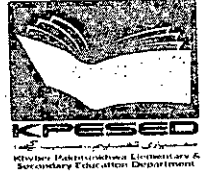
(7)

Annexure (b)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHISTAN LOWER**

Email. deokohistanl@gmail.com

Face Book: DEO Male Kohistan Lower



NO 8257 / Liti/F.NO 02 dated KH/L The 06 /09 /2021

Reminder-I

To

District Education Officer (Male)
Kohistan Upper

Subject:- Service Appeal No.514/2021 in R/O Jjehanzaib Khan PET

Memo:

Kindly refer to this office letter No.8066 dated 20/08/2021, on the subject cited above.

It is stated for your kind information that the requisite information is still aviated from your office up till now.

It is therefore, you are once again requested being court matter the said information may please be send to this office on the war basis.

Ends, No. 8258 /2021 *Dated 06/09/2021*
Copy of the above is forwarded for information to the:

1, Registrar Service Tribunal Peshawar

6/9/21
DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER

DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER

(8)

Annexure (2)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) UPPER KOHISTAN

No 6446 /

DEO (M) KHD 2/19 2021

To;

The District Education officer (M)
Kohistan Lower.

SUBJECT SERVICE APPEL NO.514/2021 IN R/O JEHANZEB KHAN PET DISTRICT LOWER KOHISTAN.

Memo:-

Reference your letter No:- 8067 LIT/F.No.2 dated 20.08.2021,you have asked to provide the record / information in r/o Mr. jehanzeb khan, PET District Lower Kohistan. In this regard our office has collected the information from Account Office as well as concerned appellant. The following record /information's have been collected and submitted to your kind information please.

As per Account Office Record

| Name | Father Name | P.No | NIC No. | D/o Birth | D/o Its App:: |
|---------------|-------------|--------|-----------------|------------|---------------|
| Jehanzeb khan | Yar Dad | 340516 | 13401-8905769-4 | 06-04-1974 | 05-04-1999 |

Salary received up to feb, 2010, Salary Stopped W, e, f 01-03-2010.

It is further added that the concerned applicant remained contested candidate, in the year 2008

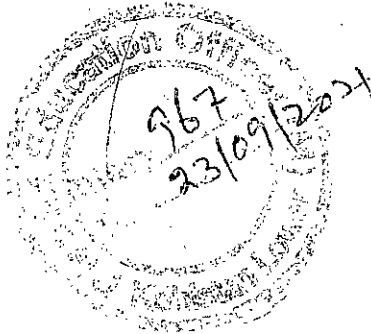
And his NIC No. is not tally according to Account Office Record. His Copy of Service Book, all Certificates, copy of NIC, Frist appointment order & transfer order are attached.

ADDO (Litigation)

Farooq Bhatti
DISTRICT EDUCATION OFFICER
(M) KOHISTAN UPPER

07/09/2021

23/9/21



(9) Amexure (d)



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHISTAN LOWER**



Email: deokohistan1@gmail.com

Face Book: DEO Male Kohistan Lower

NO 9324 / Liti/F.NO 02 dated KH/L. The 29 /o9 /~~2021~~
2021

To

District Education Officer (Male)
Kohistan Upper

Subject:- Service Appeal No.514/2021 in R/O Jehanzaib Khan PET

Memo:

Kindly refer to your letter No.6446 dated,8/9/2021,on the subject cited above.

It is stated that your good office sent photo copies of service documents in R/O Jehanzaib S/O Yerdad R/O Pattan to this office in the above case.

You are once again requested that all original record i.e. Service Book, Appointment Order, charge report and other record may please be sent to this office for submission of comment before Honorable Service Tribunal Peshawar.

The case is most urgent being court matter.

Handwritten signature

DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER

Ends, No. 9325 /2021 29 /o9 /2021

Copy of the above is forwarded for information to the:

1, Registrar Service Tribunal Peshawar

Handwritten signature
29/09/2021

DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER

Handwritten signature

Handwritten numbers and scribbles at the bottom of the page



(10)
Annexure e

Government of Khyber Pakhtunkhwa
Elementary and Secondary Education Department
Email: deokohistan1@gmail.com
Facebook: DEO Male Kohistan Lower
Office Phone # 0998-405071

Office of the District Education Officer (Male) Kohistan Lower

No. 9741/Show Cause/DEO (M) KH-L

Dated 15/10/2021

To,

Mr. Jahan Zeb S/O Yar Dad Ex-PET R/O Pattan, Appellant in Service Appeal NO. 514/2021 at Service Tribunal Peshawar.

Subject: - Personal Hearing

It has come to the notice of the undersigned, through Honorable service Tribunal KPK Peshawar, that you claimed yourself as Govt: servant and demanding your rights as Government servant. This office was established in 2019 about 03 years ago. No record related to you as government servant is available at this office.

After establishment of this office in March 2019, you never attended this office nor attended any school as a teacher as you claimed in your appeal, nor submitted any application regarding your service after expiry of more than 11 years. It means that you were absent from your official duties for about 11 years and busy in your own business. However, you attend this office as contractor regarding handing/ taking of GHS Pattan school building constructed through ERRA and pressurize the undersigned for handing taking the incomplete building of GHS Pattan and also occluded the official vehicle of the undersigned with a huge mob of community members. In this regard a letter was also sent to DPO Kohistan lower.

Whereas, this office wrote a memorandum to DEO (M) Upper Kohistan about your service record vide this office letter No. 8066 dated 20-08-2021 and subsequently reminder No. 8257 dated 6-09-2021.

Whereas, DEO (M) Upper Kohistan stated that your monthly salary was stopped in the month of March 2010 and no original record has been provided vide letter No. 6446 dated 8-09-2021.

Whereas, this office once again requested to DEO (M) Upper Kohistan for provision of original record vide this office letter No. 9324 dated 29-09-2021, but no response from DEO (M) Upper Kohistan has been received up till now.

Whereas, no service record is available and as you claimed yourself a government servant, you are required to submit the answer of the following questions (in writing) to go forward in submission of reply of your appeal in service tribunal.

- 1- You submitted service appeal after 11 years, why?
- 2- In which school/schools you have been performing your duties in these 11 years?
- 3- How did you contest election being a government, as you claimed in your service appeal?
- 4- Once you visited the office of the undersigned with a JIRGA of community members as a contractor of under construction building of GHS Pattan and you were requesting to hand over the school building, what was that story?

You are required to make your presence on 25/10/2021 at 2:00 PM before a committee (with written answers to the above 04 questions) for personal Hearing in the office of undersigned, failing which it will be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you under relevant rules.

Received copy
of this letter

[Handwritten signature and notes]
2021-10-15
15403-28 23654

O/c

[Handwritten signature]
15/10/2021

District Education Officer (Male)
Kohistan Lower

(11) Annexure (B)

(9)



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHISTAN LOWER
Phone No. 0998-405071. Email. deokohistanl@gmail.com



OFFICE ORDER:-

In the light of Personal Hearing called from Mr. Jahan Zeb son of Yar Dad Resident of Pattan Appellant in Service Appeal No.514/2021 at Service Tribunal Peshawar, claimed himself as Government Servant and demanding for Rights as Government Servant. The following Committee is hereby constituted for Fact Finding in the light of Personal Hearing on 25/10/2021 and to submit detailed report/recommendations within 2 days after the Personal Hearing.

1. Mr. Gul Badshah B-18 Principal GHS Pattan Kohistan Lower.
2. Mr. Sultani Room B-18 Principal GHSS Ranolia Kohistan Lower.
3. Mr. Furqan B-17 H/M GHSS Chakai Kohistan Lower.
4. Mr. Aurang Zeb Khan B-16 ADEO (Sports) DEO (M) Office Kohistan Lower.

*****The Matter may be treated as most important being a Court Case.*****

Enclosed:- A Copy of Personal Hearing.

o/c

[Signature]
18/10/21
District Education Officer (M)
Kohistan Lower.

Endstt: No 9743-48 DEO (M) KH-L Dated Pattan the 18/10 /2021

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Mr. Gul Badshah B-18 Principal GHS Pattan Kohistan Lower.
3. Mr. Sultani Room B-18 Principal GHSS Ranolia Kohistan Lower.
4. Mr. Furqan B-17 H/M GHSS Chakai Kohistan Lower.
5. Mr. Aurang Zeb Khan B-16 ADEO (Sports) DEO (M) Office Kohistan Lower.
6. Mr. Jehan Zeb S/O Yaradad R/O of Pattan is directed to appear before the above committee on **25/10/2021** in the office of the undersigned at **11:00 AM** Positively.

o/c

[Signature]
18/10/21
District Education Officer (M)
Kohistan Lower.

12) Annexure (9)



OFFICE OF THE PRINCIPAL GOVT: MODEL GARRISON HIGH SCHOOL
PATTAN DISTT: KOHISTAN LOWER



NO. 448

Date 06 / 11 / 2021

To

The District Education Officer (Male)
Kohistan lower

SUBJECT: Inquiry for Facts Finding through Personal Hearing

Memo:

Reference your office order bearing Endst: No. 9743-48 Dated 18-10-2021, a fact finding committee was constituted to probe into the matter (the claim of Mr. Jahan Zeb S/O Yardad Ex -PET R/O Pattan KH-L that he is a Govt: Servant and deserves service Rights)

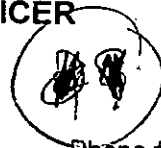
Mr. Jahan Zeb the Appellant in service tribunal vide Appeal No. 514/2021 has appeared before the inquiry committee on 25-10-2021 and the committee gave him the personal hearing letter. After receiving the letter Mr. Jahan Zeb said that he will respond to the committee after consultation with his lawyer by 02-11-2021. After that the committee repeatedly tried to contact him on cell phone but his cell phone always found not responding and thus no written or verbal respond/ reply is received from the appellant (Mr. Jahan Zeb). Therefore, the report is hereby submitted for further necessary proceeding please.

| Name of officer | Designation | Signature |
|-----------------|-------------------------------|-----------|
| Mr. Gul Badshah | Principal BPS-18 GHS Pattan | |
| Mr. Sultan Room | Principal BPS-18 GHSS Ranolia | |
| Mr. Furqan | H/M BPS 17 GHSS Chakai | |
| Mr. Aurang Zeb | ADEO Sports | |

ADEO (Kittigalia)
Pl put up immediately by big case
18/11/2021

OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) KOHISTAN LOWER

Amirul H



Phone # 0998-405071

Email: deokohistan1@gmail.com

Facebook: DEO Male Kohistan Lower

No. 6604 /P&D/DEO (M) KH-L
To

Dated 26/10/2020

The Deputy Commissioner,
Kohistan Lower
Subject: **ISSUE OF HANDING OVER THE INCOMPLETE BUILDING OF
GHS PATTAN**

Memo.

I am directed to refer to the subject cited above and to state that, as it was discussed during the meeting of Benevolent fund in the presence of the contractor that the building of the above named school will be handed over to E&SE department after completion. It was also directed by your good self to contractor that ERRA will bring the completion documents on file and the contractor is no more allowed / required to contact with DEO (M) office verbally.

On 23 October, 2020 at 11AM when I was on way to visit GHSS Chakai in connection with a "School management information system training" at the school, the contractor (namely Jehan Zaib S/O Yar Dad R/O Pattan) along with a large covered stopped my official vehicle by force and insulted me. He demanded to handover the building immediately and after that remaining work will be completed. How an incomplete building can be handed over by the department only on verbal order and unjustified and illegal pressure by the contractor?

It is therefore requested to please make necessary action against the contractor as per rules to avoid any accident / event as already been done with the Nawab Ali Khan (Late), DEO Male Kollai Pallas Kohistan.

(Hafiz Muhammad Nawaz Abbasi)
District Education Officer (M)
Kohistan Lower

Endstt: No. 660509 /P&D/DEO (M) KH-L DATED 26/10/2020

Copy of the is forwarded to the

1. Secretary to E&SE Department Khyber Pakhtunkhwa Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Police Officer Kohistan Lower.
4. Program Manager DRU Shangla Kohistan at Besham.
5. Office record.

Dy. District Education Officer
Kohistan Lower

DB

(14) Annexure (i)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHISTAN LOWER**



Email: deokohistan1@gmail.com

Face Book: DEO Male Kohistan Lower

NO 8960 / Liti/F.NO 02 dated KH/L The 16 /09 /2021

To,

The Election commissioner
District Kohistan Upper

Subject: PROVISION OF RECORD FOR SUBMISSION OF COMMENT IN SERVICE TRIBUNAL APPEAL NO. 514/2021

Memo:

Kindly refer to the subject cited above and request that an inquiry against Jehan Zeb Khan S/O Yarded R/O Pattan Kohistan Lower, EX-PET Teacher under process. The undersigned has been reported by some of the officials of DEO (M) Kohistan office that the above named teacher has contested of general election 2008, PF-26 Provincial assembly. Now the said official has filed the service appeal No 514/2021 before the KP Service Tribunal Peshawar.

Therefore, you are requested to provide the Election record i.e. Nomination form etc. as soon as possible for an early disposal of the case pleas.

Ends, No. 8961

- 1, Copy of the above is forwarded for information to the:
Registrar Service Tribunal Peshawar.

[Signature]
26/9/21
DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER

[Signature]
DISTRICT EDUCATION OFFICER (M)
KOHISTAN LOWER

