


FORM OF ORDER SHEET

Court of _____

Appeal No. 1215/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/05/2023	<p>The appeal of Mr. Mujahid Ali resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>31-05-2023</u>.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

Respected Sir,

It is submitted that the present appeal was received on 12.01.2023, which was returned to the counsel for the appellant for removing objection (Flag-A). Today i.e. 10.02.2023 he re-filed the same without removing the objection with a note i.e. (Flag-B).

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

Worthy Chairman

Be returned with
direction to file it again
in accordance with
rule 6(c) of the KPST
Rules, 1974
16/2/23.

REGISTRAR 10/2/23

8E no. - 603

Date - 16/02/2023

R/Sir,

The objection has been removed
and the appeal is resubmitted in
accordance with rule 6(c) of the KPST
Rules, 1974.


Wahid
129/1/23

The appeal of Mr. Mujahid Ali Additional Assistant Commissioner Revenue Charsadda received today i.e. on 12.01.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Addresses of respondents no. 4 to 125 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 168 /S.T,

Dt. 13/1 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. nor Muhammad Khattak Adv.
High Court Pesh.

Recd. 18/1/23

The Respondents No. 4 to 125 are the employees of respondent No. 2, therefore they be served through Respondent No. 2, further more the home addresses of the Respondent No. 4 to 125 has already been provided.



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR.

APPEAL No. _____/2022

MUJAHID ALI

VS

GOVT. OF KPK & OTHERS

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APPELLANT

THROUGH:


**NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1215 /2023

Mr. Mujahid Ali, Additional Assistant Commissioner (Revenue), Charsadda.
.....**APPELLANT**

VERSUS

1. The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary, Establishment Department, Khyber Pakhtunkhwa,
Peshawar.
3. The Senior Member Board of Revenue, Khyber Pakhtunkhwa,
Peshawar.
4. Mst: Tahreem Shah, Additional Assistant Commissioner Peshawar.
5. Mr. Sajid Ullah, Additional Assistant Commissioner (UT), Kohat.
6. Mr. Ahmad Nasrullah, Section Officer Mines & Minerals Department,
Peshawar.
7. Mr. Fida Hussain, Additional Assistant Commissioner Charsadda.
8. Mr. Faisal Ismail, Additional Assistant Commissioner Daggar Buner.
9. Mr. Syed Mehar Ali Shah, Additional Assistant Commissioner Mandan
Buner.
10. Mr. Muhammad Sohail, Additional Assistant Commissioner (REV)
Tribal District Mohmand.
11. Mr. Farangis Azim, Section Officer Finance Department, Peshawar.
12. Mr. Atta Ullah, Additional Assistant Commissioner-I Bannu.
13. Mr. Atif Afridi, Additional Assistant Commissioner-I Hangu.
14. Mr. Navaira Farooq, Assistant Commissioner (Baffa Pakhel)
Mansehra.
15. Mr. Aamir Zeb, Additional Assistant Commissioner (REV) Tribal
District Khyber.
16. Mr. Sadiq Ali, Additional Assistant Commissioner Wana District
South Waziristan.

17. Mr. Tauseef Ur Rehman, Additional Assistant Commissioner Lower Mohmand, Tribal District Mohmand.
18. Mr. Muhammad Amir Khan, Additional Assistant Commissioner Upper Kurram, Tribal District Kurram.
19. Mr. Sheroz Rashid Ahmad Khan, Additional Assistant Commissioner (Central) Tribal District Kurram.
20. Mr. Syed Muhammad Arsalan, Additional Assistant Commissioner (Upper Orakzai) Tribal District Orakzai.
21. Mr. Additional Assistant Commissioner (Nawagai) Tribal District Bajaur.
22. Mr. Muhammad Fayaz, Additional Assistant Commissioner (REV) Tribal District Kurram.
23. Mr. Khalid Imran, Additional Assistant Commissioner (REV) District North Waziristan.
24. Mr. Zyed Khan Safi, Additional Assistant Commissioner (Mir Ali) Tribal District North Waziristan.
25. Mr. Muhammad Buraq Awan, Additional Assistant Commissioner (REV) District South Waziristan.
26. Mst. Syeda Zainab Naqvi, Additional Assistant Commissioner District Peshawar.
27. Mr. Anis Ur Rehman, Additional Assistant Commissioner (REV) Lower Kohistan.
28. Mr. Riaz Ali, Additional Assistant Commissioner (Barikot) District Swat.
29. Mr. Wasim Ullah Khan Khattak, Assistant Commissioner Judhi, Torghar.
30. Mst: Sonia Naz, Section Officer Finance Department Chief Minister Secretariat Peshawar.
31. Mr. Shayan Ali, Section Officer Finance Department Peshawar.
32. Mr. Kabir Ahmad Khan, Additional Assistant Commissioner (Drosh) Lower Chitral.
33. Mr. Adnan Khan, Additional Assistant Commissioner (Dara Adam Khel) Tribal District Sub Division Kohat.
34. Mr. Sohail Ahmad Shah Bukhari, Additional Assistant Commissioner (Sarwakai) South Waziristan.
35. Mr. Fahad Zia, Additional Assistant Commissioner Kolai Palas, Kohistan.

36. Mr. Khayyam Nasir, Additional Assistant Commissioner (Wazir) Tribal District Sub Division Bannu.
37. Mr. Haroon Salim, Additional Assistant Commissioner Baizai Tribal District Mohmand.
38. Mr. Khizar Faiz, Assistant Commissioner Central Kurram.
39. Mst; Sana Shah, Additional Assistant Commissioner-II Lahor Swabi.
40. Mr. Asfandyar Khalid, Additional Assistant Commissioner (REV) Tribal District Orakzai.
41. Mr. Shahid, Additional Assistant Commissioner (Razmak) Tribal District North Wazirstan.
42. Mr. Muhammad Ali, Additional Assistant Commissioner (Mastuj) Upper Chitral.
43. Mr. Inam Ullah, Additional Assistant Commissioner (Darazinda) D.I.Khan.
44. Mr. Awais Khan, Additional Assistant Commissioner (Bettani) District Lakki Marwat.
45. Mr. Sheroze Mufti, Additional Assistant Commissioner (REV) Chitral Lower.
46. Mr. Junaid Akbar, Additional Assistant Commissioner Upper Mohmand Tribal District Mohmand.
47. Mr. Muhammad Shahbaz Khan, Additional Assistant Commissioner Khar Bajaur.
48. Mr. Irshad Ul Haq, Section Officer Chief Minister Secretariat Peshawar.
49. Mr. Muhammad Fasih Ishaq Abbasi, Additional Assistant Commissioner (Rodkahi) D.I. Khan.
50. Mr. Shahab Ahmad Khan, Section Officer Irrigation Department Peshawar.
51. Mr. Junaid Khalid, Section Officer Mines & Minerals Department Peshawar.
52. Mr. Amir Mustafa, Section Officer Local Govt & Rural Development Department Peshawar.
53. Mr. Munir Ahmad Khan, Section Officer Irrigation Department Peshawar.
54. Mst: Tania Shaheen, Section Officer Finance Department Peshawar.

55. Mr. Syed Yasir Ali Shah, Section Officer Health Department Peshawar.
56. Mr. Muhammad Sohail Khan, Section Officer Labour Department Peshawar.
57. Mst. Mariam Hameed, Assistant Commissioner Samar Bagh, Dir Lower.
58. Mr. Salim Ullah Khan, Section Officer Forestry, Environment & Wildlife Department Peshawar.
59. Mr. Kamran Khan, Section Officer Relief, Rehabilitation & Settlement Department Peshawar.
60. Mr. Muhammad Hamid Siddique, Section Officer Auqaf Department Peshawar.
61. Mr. Saad Muneer, Section Officer Energy & Power Department Peshawar.
62. Mst: Sameera Saba, Additional Assistant Commissioner Peshawar.
63. Mr. Bilal Nasir, Section Officer Transport Department Peshawar.
64. Mr. Sultan Noor Ud Din Ahmar, Section Officer Finance Department Peshawar.
65. Mr. Luqman, Section Officer Sports, Culture & Tourism Department Peshawar.
66. Mr. Muhammad Ihsan Tahir, Section Officer Food Department Peshawar.
67. Mr. Allah Nawaz, Section Officer Agriculture, Livestock & Cooperative Department Peshawar.
68. Mr. Shahid Ullah, Section Officer Agriculture, Livestock & Cooperative Department Peshawar.
69. Mr. Shakeel Ahmad, Assistant Director PMRU o/o Chief Secretary KPK, Peshawar.
70. Mr. Hazrat Bilal, Section Officer Finance Department Peshawar.
71. Mr. Amir Ullah Khan, Section Officer Industries Department Peshawar.
72. Mr. Riyaz Ahmad, Section Officer P & D Department Peshawar.
73. Mr. Sikandar Afzaal, Section Officer Health Department Peshawar.
74. Mr. Usman Hamza, Section Officer Zakat, Usher & Social Welfare Department Peshawar.
75. Mr. Aftab Alam, Additional Assistant Commissioner Mardan.

76. Mr. Naseer Abbas Khalil, Section Officer E & SE Department Peshawar.
77. Mr. Muhammad Saqib, Section Officer Industries Department Peshawar.
78. Mr. Noor Nawaz, Section Officer E & SE Department Peshawar.
79. Mr. Zarak Yar Khan Toru, Section Officer Finance Department Peshawar.
80. Mr. Baqir Ali, Section Officer E & SE Department Peshawar.
81. Mr. Muhammad Idrees Khan, (Section Officer E & SE Department Peshawar.
82. Mr. Adnan Mumtaz, Section Officer Mines & Minerals Department Peshawar.
83. Mr. Noman Parvaiz, Section Officer Forestry, Environment & Wildlife Department Peshawar.
84. Mr. Mishab Waheed, Section Officer P & D Department Peshawar.
85. Mr. Syed Aehsan Ali Shah, Section Officer P & D Department Peshawar.
86. Mr. Junaid Shah, Section Officer E & SE Department Peshawar.
87. Mr. Zeeshan Najeeb, Section Officer Relief, Rehabilitation & Settlement Department Peshawar.
88. Mr. Ishtiaq Ahmad, Section Officer Agriculture, Livestock & Cooperative Department Peshawar.
89. Mr. Shah Nawaz Khan, Section Officer Governor Secretariat Peshawar.
90. Mr. Naveed Ahmad, Assistant Registrar KP Appellate Tribunal Sales Tax Peshawar.
91. Mr. Umar Mukhtar, Assistant Director Board of Revenue Peshawar.
92. Mr. Marium Burki, Finance Officer D.I. KHAN.
93. Mr. Muhammad Faizan Zeb, Section Officer E & SE Department Peshawar.
94. Mr. Fawad Ahmad Khan, Section Officer Health Department Peshawar.
95. Mst: Sabeeha Hastam, Finance Officer Mardan.
96. Mr. Aftab Ahmad, Finance Officer District Shangla.
97. Mst: Khaula Haqdar, Finance Officer District Charadda.
98. Mr. Muhammad Ali, Finance Officer Battagram.
99. Mr. Sohny Saleem, Section Officer Finance Department Peshawar.
100. Mr. Ramiz Ali Shah, (Finance Officer Peshawar.
101. Mr. Umer Ahmad Khitran, Finance Officer Lakki Marwat.
102. Mr. Aimal Khan, Finance Officer BUNER.
103. Mr. Jamshed Alam Khan, Finance Officer Kohat.

- 104. Mst. Haseena Khan, Assistant Director Private School Regulatory Authority, Peshawar.
- 105. Mr. Sanaullah, (Finance Officer Bajaur.
- 106. Mst. Brekhna Habib, Section Officer Health Department Peshawar.
- 107. Mr. Nadir Nazar, Section Officer Health Department Peshawar.
- 108. Mr. Nasir Ali, Section Officer Higher Education Department Peshawar.
- 109. Mr. Saddam Hussain, Assistant Commissioner (Inland Revenue) FBR, Peshawar.
- 110. Mst. Madeeha Khan, Assistant Director PDMA Peshawar.
- 111. Mst. Nayab Abbasi, Section Officer Finance Department Peshawar.
- 112. Mr. Shah Wali Khan, Section Officer Chief Minister Secretariat Peshawar.
- 113. Mr. Waseem Yousaf Khan Khattak, Section Officer Home Department Peshawar.
- 114. Mst. Samia Jabeen, Section Officer Higher Education Department Peshawar.
- 115. Mst. Samira Mahsood, Section Officer E & SE Department Peshawar.
- 116. Mst. Shagufta Sarwar, Section Officer Chief Minister Secretariat Peshawar.
- 117. Mst. Sana Fatima, Section Officer LAW Department Peshawar.
- 118. Mst. Sahar Anwar Khan, Services placed at the disposal of P & D Department Peshawar.
- 119. Mst. Sanovia Kakar, Section Officer Law & PAs Department Peshawar
- 120. Mst. Misbah Khalid, Section Officer Health Department Peshawar.
- 121. Mst. Sara Humayoun, Section Officer Inter Provincial Coordination Department Peshawar.

- 122. Mst. Shawana Haleem, Finance Officer Dir Lower.

- 123. Mst. Christina Zeb Ul Nisa Feroz, Assistant Commissioner (Puran) District Shangla.

- 124. Mr. Fawad Ahmad, Assistant Director PDMA Peshawar.

- 125. Mr. Adnan Haider Malooki, Assistant Director PDMA Peshawar

.....RESPONDENTS

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 15-04-2022 WHEREBY APPELLANT HAS BEEN PROMOTED TO THE POST OF PMS OFFICER (BPS-17) WITH IMMEDIATE EFFECT INSTEAD OF w.e.f 20.02.2020 AND AGAINST NOT TAKING ACTION ON DEPARTMENTAL APPEAL OF THE APPELLANT ON THE EXPIRY OF STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned notification dated 15.04.2022 may kindly be modified/rectified to the extent of appellant and the appellant may kindly be promoted to the post of PMS BPS-17 Officer w.e.f 20.02.2020 instead of with immediate effect with all back benefit including seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

1. That appellant is the employee of respondent Department and is serving as Additional Assistant Commissioner (BPS-17) at Charsadda, District Charsadda quite efficiently and up to the entire satisfaction of his superiors.
2. That appellant while serving as Tehsildar (BPS-16), the respondent Department issued a list regarding panel of Tehsildars for consideration to the next higher scale i.e. PMS (BPS-17) wherein name of the appellant was placed at serial No.38 in the ibid list. Copy of the list of Tehsildar is attached as Annexure.....**A.**
3. That it is important to mention here, that through letter dated 18.02.2020 the meeting of the provincial Selection Board (PSB) was scheduled to be held on 20/02/2020 but unfortunately the meeting was postponed due to the decision of Peshawar High Court, setting aside the Act of Provincial Assembly enhancing the age of retirement to 63 years. That working papers in respect of promotion of Tehsildar BPS-16 to the post of PMS Officer BPS-17 were prepared whereafter the Seniority list of the eligible Tehsildar BPS-16 was issued whereby the appellant was placed at Serial No.47 of the ibid seniority list. Copies of the letter dated 18.02.2020, working paper and seniority list are attached as Annexure**B, C & D.**
4. That since the appellant apprehended that the nominees of the Khyber Pakhtunkhwa Public Service Commission would be appointed, therefore, the appellant preferred a representation/application before the worthy Chief Secretary Khyber Pakhtunkhwa, Peshawar to re-schedule the PSB as soon as possible for promotion to the post of PMS BPS-17 but the same could not be held. Copy of the application dated 14.02.2020 is attached as annexure.....**E.**
5. That feeling aggrieved the colleagues of the appellant knocked the door of Peshawar High Court in writ petition No.1861-P/2020 whereafter the appellant filed Miscellaneous Application for impleadment in the array of the petitioners in the ibid writ petition which was allowed, but during the pendency of the mentioned writ petition the respondent department appointed the private respondents as PMS Officers (BPS-17) vide Notification dated 29.05.2020 on the recommendation of the Public Service Commission. Copies of the memo of writ petition, Miscellaneous Application and Notification dated 29.05.2020 are attached as annexure**F, G & H.**

6. That subsequently another PSB meeting was held on 09.06.2020 and the respondent department promoted the other colleagues of the appellant to the post of PMS Officer (BPS-17) on regular basis vide Notification dated 02.07.2020, but the appellant was ignored on the account of pendency of CPLA against the appellant before the August Supreme Court of Pakistan. Copies of the PSB meeting and Notification date 02.07.2020 are attached as annexureI & J.
7. That the appellant aggrieved from the ibid notification dated 02.07.2020 filed departmental appeal which was rejected on 30.09.2020 followed by the service appeal No.12885/2020 before the Khyber Pakhtunkhwa Service Tribunal which was dismissed on the ground of jurisdiction vide order dated 25.02.2021. Copy of Judgment dated 25.02.2021 is attached as AnnexureK.
8. That the respondent department astonishingly issued the impugned notification dated 15.04.2022 whereby the appellant has been promoted to the post of PMS BPS-17 on the regular basis with immediate effect instead of 20.02.2020 when the first meeting of PSB to be scheduled for the promotion of the appellant with other colleagues to the post of PMS BPS-17 Officer. Copies of the impugned notification dated 15.04.2022 is attached as AnnexureL.
9. That the appellant feeling aggrieved from the impugned notification dated 15.04.2022, preferred Departmental Appeal before the competent authority but the same has not responded till date. Copy of the Departmental Appeal is attached as AnnexureM.
10. That appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned notification dated 15.04.2022 whereby the appellant was prompted to the post of PMS BPS-17 Officer with immediate effect instead of 20.02.2020 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/rectified.
- B- That appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as subject noted above and as such the respondents violated Article-4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the impugned notification dated 15.04.2022 is against the law, facts and norms of natural justice, therefore not tenable and liable to be set aside.
- D- That appellant has been discriminated by the respondents by not promoting the appellant to the post of PMS-17 Officer from the date when appellant promotion was due w.e.f 20.02.2020.

9-

- E- That the respondents acted in arbitrary and malafide manner while issuing the impugned notification dated 15.04.2022 with immediate effect instead of due date i.e. 20.02.2020.
- F- That the respondents violated Section-9 of the Civil Servant Act, 1973 read rule-7 of the Appointment, Promotion & Transfer Rules, 1989 by issuing the impugned notification dated 15.04.2022 with immediate effect instead of 20.02.2020.
- G- That appellant is fully entitled for promotion from the date when the first PSB was scheduled i.e. 20.02.2020.
- H- That the impugned notification dated 15.04.2022 is violative of Article-38 (e) of the Constitution of Islamic Republic of Pakistan, 1973.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: .12.2022



APPELLANT

THROUGH

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**



WALEED ADNAN

UMAR FAROOQ MOMAND

&

**MUHAMMAD AYUB
ADVOCATES**

AFFIDAVIT

I Mujahid Ali, Additional Assistant Commissioner (Revenue), Charsadda, do hereby solemnly affirm that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



Deponent

9/A

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

CM NO. _____/2022

IN

APPEAL NO. _____/2021

MUJAHID VS GOVT OF KPK & OTHERS

APPLICATION FOR CONDONATION OF DELAY IN FILING THE
ABOVE NOTED APPEAL.

R.SHEWETH:

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal on the following grounds inter alia:

GROUND OF APPLICATION:

- A- That valuable rights of the appellant are involved in this case hence the appeal deserves to be decided on merit.
- B- That it is worth mentioning that similar nature Service Appeals of *the are pending adjudication before this Hon'ble Tribunal.*
- C- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather than technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.


Applicant

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

AFFIDAVIT

I, Mujahid Ali, Additional Assistant Commissioner (Revenue), Charsadda, do hereby solemnly affirm and declare on Oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.


DEPONENT

PANEL OF TEHSILDARS FOR CONSIDERATION (For Senior Member)

S. No.	Seniority No.	Name of officers with qualification	Date of birth	Date of 1 st entry into Govt. services	Date of appointment/promotion to BS-16	Date of regular appointment/promotion to the present scale	Whether fulfil the prescribed length of service	Quantified scores	Missing PERs (If any)	Disciplinary proceedings (If any)	Case (if any) in any court of law including NAB/Plea bargaining with NAB	Mandatory training for promotion	Research papers	Present posting	Remarks
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	1	Mr. Muhammad Ikramullah (M.A)	09.03.1965	01.07.1995	06.09.2008	06.09.2008	Yes		2015 to 2018	Pending Anti-Corruption Case		Yes		Tehsildar Paharpur	Promoted from Naib Tehsildar Deficient PER
2	2	Mr. Kirmanullah (M.A)	20.01.1961	08.01.1981	06.09.2008	06.09.2008	Yes		1.1.2018 to 30.6.2018	No	No	Yes		AAC (OPS)	On 14.11.2017. Opted not to be promoted. Now seek promotion PMS BS-17 10.01.2018
3	3	Mr. Abdul Ghafar (B.A)	15.12.1974	14.02.2004	04.06.2013	04.06.2013	Yes		2018	No	No	No		Tehsildar Domall	Promoted from Naib Tehsildar On 07.09.2013 opted not to be promoted
4	4	Mr. Hidayatullah (B.A)	28.04.1962	13.03.1991	04.06.2013	04.06.2013	Yes			No	No	Yes		AAC (OPS)	Eligible.
5	5	Mr. Shah Nawaz (B.A)	01.10.1959	11.11.1981	04.06.2013	04.06.2013	Yes			Exonerated in VR case		No		Tehsildar Kakki	Promoted from Naib Tehsildar On 28.06.2013 opted not to be promoted

Handwritten initials/signature in the Remarks column of the first row.

Vertical text on the right margin: 10/10/2018, 10:10 P.M., 10/10/2018, 10:10 P.M., 10/10/2018, 10:10 P.M., 10/10/2018, 10:10 P.M.

①

7	Mr. Gobur Ali (BA)	20.07.1964	19.12.1985	26.03.2019	26.03.2019	No	No	No	No	YES	Senior Inspector, Maintenance	Promoted from Super on 18.06.2013. On 09.09.2018 opted not to be promoted. Now self promotion is PMS B-17 on 09.01.2014
8	Mr. Abdur Rehman Shah (BA)	15.07.1995	23.01.2007	10.02.2015	10.02.2015	YES	No	No	No	YES	Inspector, Punjab	Deficient in PERS.
9	Mr. Zahid Ahmad (BA)	01.01.1967	29.01.1986	10.02.2015	10.02.2015	YES	Life	No	No	YES	Asst. Commr. CPEC	
10	Syed Mir Liaq Shah (BA)	27.04.1963	08.07.1983	10.02.2015	10.02.2015	YES	No	No	No	YES	Sub-Inspector, Fardpur	Eligible
11	Mr. Muhammad Usaid (BSC)	10.02.1988	01.02.2016	01.02.2016	01.02.2016	YES	No	No	No	YES	Sub-Inspector, Fardpur	Eligible
12	Mr. Shah Ghulam (BA)	20.11.1973	28.06.1997	15.12.2016	15.12.2016	YES	No	No	No	YES	Sub-Inspector, Fardpur	Eligible
13	Mr. Fiaz Ahmad Qureshi (BA)	12.04.1962	15.08.1967	15.12.2016	15.12.2016	YES	No	No	No	YES	Asst. Commr. (Ops)	Eligible
14	Mr. Abdul Mujib (MA)	20.01.1963	28.08.1988	15.12.2016	15.12.2016	YES	No	No	No	YES	Asst. Commr. (Ops)	Eligible
15	Mr. Iqbal Said (M. Com)	10.01.1964	28.08.1988	15.12.2016	15.12.2016	YES	No	No	No	YES	Asst. Commr. (Ops)	Eligible

16	16	Mr. Sahib Zada (BA)	10.11.1961	04.09.1988	15.12.2016	15.12.2016	Yes			No	No	Yes		TEAC (OPS) SINGLE	Eligible
17	17	Mr. Zahid Kamal (BA)	18.05.1964	01.03.1990	15.12.2016	15.12.2016	Yes			No	No	Yes		Tehsildar (Khuzdar)	Eligible
18	18	Mr. Habib Ahmad Jan (MA)	01.03.1963	02.07.1987	15.12.2016	15.12.2016	Yes			No	No	Yes		AACOPS)	Eligible
19	19	Mr. Tahir Ashraf (MA)	24.01.1970	28.02.1988	16.11.2017	16.11.2017	No			No	No	Yes		ROPESCO Abbottabad	Promoted from Assistant Length of service not completed
20	20	Mr. Afzar Khan (BA)	10.04.1964	04.12.1989	06.04.2018	06.04.2018	No		2016 to 2018	No	No	No		Tehsildar Takhtba	Promoted from Sub Registrar Length of service not completed
21	21	Mr. Abdul Qayum (BA)	20.02.1965	20.03.1988	16.11.2017	16.11.2017	No		2001 to 2017 & 2018	No	No	No		Tehsildar Razar	Promoted from Sub Registrar Length of service not completed
22	22	Mr. Muhammad Azam Khan (BA)	08.12.1959	14.07.1982	16.11.2017	16.11.2017	No		2016 & 2018	No	No	Yes		Tehsildar Charada	Promoted from Sub Registrar Length of service not completed
23	23	Mr. Waheedullah (MA/LLB)	10.02.1973	20.09.1995	16.11.2017	16.11.2017	No			No	No	Yes		Tehsildar Pura	Promoted from Sub Registrar Length of service not completed
24	24	Mr. Ajam Khan (BA)	15.06.1963	07.10.1987	16.11.2017	16.11.2017	No			No	No	Yes		Tehsildar Khar Tribal District Bajaur	Promoted from District Kanungo Length of service not completed
25	25	Mr. Muhammad Javed (BA)	22.04.1966	25.09.1990	16.11.2017	16.11.2017	No			No	No	Yes		Tehsildar Havlian	Promoted from District Kanungo Length of service not

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26	26	Mr. Shah Nadeem (BSC)	02.04.1983	09.08.2004	16.11.2017	16.11.2017	No			No	No	No	Nowshera	Promoted from Assistant Length of service not completed.
27	27	Mr. Arshad Mahmood (MSC/LLB)	04.02.1967	17.09.1991	16.11.2017	16.11.2017	No			No	No	No	Tehsildar Manshra	Promoted from Assistant Length of service not completed.
28	28	Muhammad Hasrat Khan (BA)	15.04.1968	17.09.1991	16.11.2017	16.11.2017	No			No	No	No	Tehsildar Khanpur	Promoted from Assistant Length of service not completed.
29	29	Mr. Niamanullah Kundi (BA)	22.09.1965	09.01.1992	16.11.2017	16.11.2017	No		2017, 2018	No	No	No	Tehsildar Jhangra	Promoted from Assistant Length of service not completed.
30	30	Mr. Raja Tasawar Khan (BA)	15.04.1968	05.03.1992	16.11.2017	16.11.2017	No		2017, 2018	No	No	No	Tehsildar Ghazi	Promoted from Assistant Length of service not completed.
31	31	Mr. Ishaq Ali Khan (BA)	14.10.1963	13.09.1992	16.11.2017	16.11.2017	No			No	No	No	Tehsildar Soanwan	Promoted from Assistant Length of service not completed.
32	32	Muhammad Zaman (BA)	04.01.1968	25.10.1992	16.11.2017	16.11.2017	No			No	No	No	Senlement Tehsildar Nowshera	Promoted from Assistant Length of service not completed.
33	33	Muhammad Imran Zaman (BA)	05.05.1979	23.04.2008	16.11.2017	16.11.2017	No		2018	No	No	No	Tehsildar Swabi	Promoted from Assistant Length of service not completed.

34	Mr. Khalid Mansoor (MA)	10.03.1974	12.08.2008	16.11.2017	16.11.2017	No		2017 & 2018	No	No	No		At the disposal of Comr Peshawar	Promoted from Assistant Length of service not completed
35	Mr. Ahmad Hashmi (BA)	02.04.1983	02.02.2009	06.04.2018	06.04.2018	Yes			No	No	Yes		TOSD	Eligible
36	Mr. Yousaf Khan Khattak (MA)	25.05.1979	02.02.2009	17.01.2019	17.01.2019	Yes			No	No	Yes		Tehsildar Badsher	Eligible
37	Muhammad Var (MA)	02.02.1979	02.02.2009	17.01.2019	17.01.2019	Yes			No	No	Yes		Tehsildar Mana	Eligible
38	Mr. Mujahid Ali (MA)	19.04.1974	02.02.2009	06.04.2018	06.04.2018	Yes			No	No	Yes		Awaiting posting in IBOR	Eligible
39	Syed Abdul Akbar Shah (MS/MA/MPHil)	11.04.1981	02.02.2009	06.04.2018	06.04.2018	Yes		2017 & 2018	NO	No	No		At the disposal of Comr Peshawar	
40	Mr. Rahim Shah (BA)	13.01.1969	03.09.1990	06.04.2018	06.04.2018	No			NO	No	No		Tehsildar Thal	Promoted from Assistant Length of service not completed
41	Mr. Muhammad Nawaz (MA)	25.12.1961	09.10.1980	06.04.2018	06.04.2018	No		2017 & 2018	NO	No	No		Tehsildar Karmun	Promoted from Assistant Length of service not completed
42	Mr. Farooq Shah (BA)	04.01.1961	01.12.1984	06.04.2018	06.04.2018	No		1986 & 2018	No	No	No		Reader to MBR-I	Promoted Assistant Length of service not completed
43	Mr. Muhammad Ayaz (BA)	20.02.1983	30.04.2009	17.01.2019	17.01.2019	No		2018	No	No	No		Tehsildar CLCP Khyber	Promoted Assistant Length of service not completed
44	Syed Sultan Haider Shah (BA, LLB)	08.12.1972	02.02.2009	17.01.2019	17.01.2019	Yes			No	No	Yes		Tehsildar/Inspector Stamps Peshawar	Eligible

PESHAWAR

PESHAWAR

56	56	Mr. Faysal Ahmad (M.A)	10.03.1982	02.02.2009	17.01.2019	17.01.2019	Yes			No	No	No	Tehsildar Abbottabad	Promoted from NT
55	55	Mr. Bilal Ahmad (B.A/B.Ed)	10.10.1978	02.02.2009	17.01.2019	17.01.2019	Yes		2018	No	No	No	Tehsildar Torghar	Promoted from NT
56	56	Mr. Tanveer Shahzad (M.A)	30.12.1977	02.02.2009	17.01.2019	17.01.2019	Yes			No	No	No	Tehsildar Abbottabad	Promoted from NT
57	57	Mr. Ejaz Ahmad (M.A)	15.04.1976	02.02.2009	17.01.2019	17.01.2019	Yes		2013 & 2018	No	No	No	Tehsildar Abbottabad	Promoted from NT
58	58	Muhammad Salim (BSC)	03.05.1978	02.02.2009	17.01.2019	17.01.2019	Yes		2018	No	No	No	Tehsildar Oghi	Promoted from NT
59	59	Mr. Adil Wasem (BA)	25.12.1988	27.02.2009	17.01.2019	17.01.2019	Yes		2018	No	No	No	Tehsildar Madan	Promoted from NT
60	60	Mr. Muhammad Yousof (BA)	12.04.1964	22.04.1991	26.03.2019	26.03.2019	No			No	No	No	Tehsildar Mulkaw	Promoted from Assistant Under probation Length of service not completed.
61	61	Mr. Tanzil-ur-Rehman	11.02.1988	14.04.2009	26.03.2019	26.03.2019	Yes			No	No	No	Tehsildar Shah Alam	Promoted from NT Under probation

		Mr. Rabi Nawaz (BA)	12.02.1964	27.12.1983	26.03.2019	26.03.2019	Yes			No	No	No		Tehsildar Beani	Promoted from SR Under probation. Length of service not completed.
63	63	Mr. Abdul Qayyum (BA)	24.04.1974	27.12.1993	26.03.2019	26.03.2019	Yes			No	No	No		Tehsildar Bahran	Promoted from NT Under probation.
64	64	Mr. Shaikat Jabal (M.A)	27/11/1973	19.10.1992	26.03.2019	26.03.2019	Yes			No	No	No		Tehsildar Teak	Promoted from NT Under probation.
65	65	Mr. Abdur Rashid (MSC)	05.01.1962	28.03.1988	26.03.2019	26.03.2019	Yes			No	No	No		At the disposal of Civil Service (Muz)	Promoted from NT Under probation.
66	66	Sahibzada Ahmed Ali M.A (B.Ed)	17.04.1962	28.03.1988	26.03.2019	26.03.2019	Yes			No	No	No		Tehsildar Khankeel	Promoted from NT Under probation.
67	67	Mr. Gohar Ali (BA)	31.03.1980	29.03.2009	26.03.2019	26.03.2019	Yes			No	No	No		Tehsildar Narva	Promoted from NT Under probation.
68	68	Mr. Sher Dil (BA)	24.01.1974	10.04.1995	26.03.2019	26.03.2019	Yes			No	No	No		Tehsildar Koha Paha	Promoted from NT Under probation.
69	69	Muhammad Shoab (BA)	01.01.1968	09.12.1990	26.03.2019	26.03.2019	Yes		2000	No	No	No		Tehsildar Koha	Promoted from NT Under probation.
70	70	Mr. Muhammad Arshad (BA)	20.01.1967	02.09.1984	26.03.2019	26.03.2019	Yes			No	No	No		Tehsildar Mahal Kurram	Promoted from NT Under probation.
71	71	Mr. Nawab Gul (M.A)	15.11.1966	01.01.1995	26.03.2019	26.03.2019	Yes			No	No	No		Tehsildar Uchi VI	Promoted from NT Under probation.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

No. SO(PSB)ED/1-1/2020/(1)
Dated Peshawar, the 18.02.2020

PS/SMR
Dy. No. 1340
Date 18.02.2020
Dy./t. of Khyber Pakht. Khwa

To

1. The Additional Chief Secretary,
Government of Khyber Pakhtunkhwa,
Planning & Development Department.
2. The Senior Member,
Board of Revenue, Khyber Pakhtunkhwa

SUBJECT: - MEETING OF THE PROVINCIAL SELECTION BOARD.

Dear Sir,

I am directed to refer to the subject and to say that meeting of Provincial Selection Board will be held on 20.02.2020 at 10:00 am under the chairmanship of Chief Secretary, Khyber Pakhtunkhwa in the Conference Room of Chief Secretary, Khyber Pakhtunkhwa. Agenda of the meeting is enclosed.

2. You are requested to kindly make it convenient to attend the meeting.

Yours faithfully,

18/2/2020
(Abdul Hameed)
SECTION OFFICER (PSB)

Encl. As above
Endst. of even No. & date.
A copy is forwarded to:-

1. The P.S to Chief Secretary, Khyber Pakhtunkhwa.
2. The P.S to Secretary Establishment Department.
3. The P.S to Special Secretary (Reg.) Establishment Department.
4. The P.S to Special Secretary (Estt) Establishment Department.
5. The P.Ss to Additional Secretaries (Reg.-I&II) Establishment Department.

SECTION OFFICER (PSB)

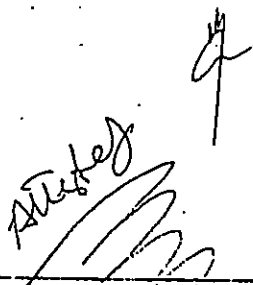
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WORKING PAPER FOR PROVINCIAL SELECTION BOARD

ESTABLISHMENT DEPARTMENT.

FILLING OF 53 POSTS OF PROVINCIAL MANAGEMENT SERVICE BS-17 FALLING TO THE PROMOTION SHARE OF TEHSILDARS BS-16 ON REGULAR BASIS.

	Nomenclature of the post / Basic Scale.	Provincial Management Service (BS-17) as detailed in schedule-II (Annex-I)		
	Service/Group/Cadre.	Provincial Management Service		
	Sanctioned strength of the cadre.	826 (767 schedule posts + 20% DTL subtracting 59 posts in the share of PAS)		
		Direct	Promotion	Transfer
(i)	Percentage of share.	50% by initial recruitment through Public Service Commission & 10% by selection on merit from amongst the graduate Ministerial Staff through Public Service Commission.	20% for Tehsildars.	
(ii)	No. of posts allocated to each category.	398 + 80 for selection through Public Service Commission.	153 for Tehsildars.	
(iii)	Present occupancy position	119 + 34	100	
(iv)	No. of vacancies.	279 + 46	53 on regular basis.	
(v)	How did the vacancy(ies) under promotion quota accrue and since when?	Explanation at (Annex-II).		
(vi)	Recruitment Rules.	<p>According to Provincial Management Service Rules 2007, the following method has been prescribed for recruitment to the posts of PMS BS-17(Annex-III).</p> <p>1) Fifty percent by initial recruitment on the recommendations of the Khyber Pakhtunkhwa Public Service Commission based on the result of competitive examination to be conducted by it in accordance with the provisions contained in schedule-IV:</p> <p>2) Subject to rule 7, by promotion in the following manner:</p> <p>(a) twenty per cent from amongst Tehsildars, who are graduates, on the basis of seniority-cum-fitness, having three years service as Tehsildar and Naib Tehsildar and have undergone a training course of nine weeks at the Pakistan Provincial Services Academy or Provincial Staff Training Institute;</p> <p>(b) twelve per cent, on the basis of seniority-cum-fitness, from amongst Superintendents, who are graduates having three years service as Superintendent and Assistant and have undergone a training course of nine weeks at the Pakistan Provincial Services Academy or Staff Training Institute; and</p> <p>(c) eight per cent, on the basis of seniority-cum-fitness, from amongst Personal Assistants and Senior Scale Stenographers, who have opted to join Provincial Management Service and are graduates with three years service as Private Secretary or Personal Assistant and have undergone a training course of nine weeks at the Pakistan Provincial Services Academy or Staff Training Institute."</p>		

Attested


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		3) Ten per cent by selection on merit, on the basis of competitive examination, to be conducted by the Commission in accordance with the provisions contained in Schedule-VIII, from amongst persons holding substantive posts of Superintendents, Private Secretaries, Personal Assistants, Assistants, Senior Scale Stenographers, Stenographers, Data Entry Operators, Computer Operators, Senior and Junior Clerks borne on the cadres strength of Secretariat who possess 2 nd Class Bachelor's Degree from a recognized University and have at least five years service as such.
(vii)	Required length of service.	03 years as Tehsildar/Naib Tehsildar.
(viii)	Whether to be promoted on regular basis or appointed on acting charge basis?	53 on regular basis.
(ix)	Mandatory training, if any.	09 Weeks mandatory training.
(x)	Minimum required score on E1.	Not applicable.

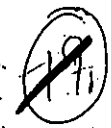
Attested
[Signature]

[Signature]

SENIOR MEMBER
BOARD OF REVENUE

[Signature]

[Stamp]



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

No. SO(PSB)ED/ 1-1/2020/13
Dated Peshawar, the 08 06 2020

To

1. The Additional Chief Secretary,
Government of Khyber Pakhtunkhwa,
Planning & Development Department.
2. The Senior Member,
Board of Revenue, Khyber Pakhtunkhwa.

SUBJECT: MEETING OF THE PROVINCIAL SELECTION BOARD.

Dear Sir,

In continuation of this Department letter of even No. dated 05 06 2020 I am directed to say that meeting of Provincial Selection Board will be held on 09 06 2020 at 12 00 hours under the chairmanship of Chief Secretary, Khyber Pakhtunkhwa in the Conference Room of Chief Secretary, Khyber Pakhtunkhwa. Agenda of the meeting along with the working papers are enclosed.

You are requested to kindly make it convenient to attend the meeting.

Yours faithfully,

[Signature] 8/6/2020
SECTION OFFICER (PSB)

Encl. As above

Dated: 08 06 2020

At copy is forwarded to:

1. The PS to Chief Secretary, Khyber Pakhtunkhwa.
2. The PS to Secretary, Establishment Department.
3. The PS to Special Secretary (Reg.) Establishment Department.
4. The PS to Additional Secretary (Reg.) Establishment Department.

[Signature] 8/6/2020
SECTION OFFICER (PSB)

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SENIORITY LIST OF GRADUATE TEHSILDARS.

S.#	Name of officer with academic qualifications	Date of birth	Date of 1 st entry into Govt. service	Regular appointment / Promotion to present posts			Present Posting
				Date	BS	Method of recruitment	
1.	Muhammad Iqbal mullah (M.A)	09.03.1965	01.07.1995	06.09.2008	16	Promotee	Tehsildar Pharipur
2.	Mr. Kiramatullah (M.A)	20.01.1961	08.01.1981	06.09.2008	16	Promotee	AAC (OPS)
3.	Mr. Abdul Ghafar (B.A)	15.12.1974	14.02.2004	04.06.2013	16	Promotee	Tehsildar Deimail
4.	Mr. Hidayatullah (B.A)	28.04.1962	13.03.1991	04.06.2013	16	Promotee	AAC (OPS)
5.	Mr. Shah Nawaz (B.A)	01.10.1959	11.11.1981	04.06.2013	16	Promotee	Tehsildar Kakki
6.	Mr. Abdul Hadi (MA)	18.04.1960	23.06.1983	15.06.2013	16	Promotee	Awaiting posting in BOR.
7.	Mr. Gohar Ali (BA)	20.02.1964	19.12.1985	26.03.2019	16	Promotee	Settlement Tehsildar Malakand
8.	Mr. Abdur Rehman Shah (BA)	15.02.1985	23.01.2007	10.02.2015	16	Promotee	Tehsildar Jamrud
9.	Mr. Waheed Ahmad (BA)	01.01.1967	29.01.1986	10.02.2015	16	Promotee	LAC CPEC Tahkot
10.	Syed Mir Laiq Shah (BA)	27.04.1963	08.03.1983	10.02.2015	16	Promotee	Tehsildar Haripur
11.	Mr. Muhammad Junaid Khan (BSC)	10.02.1988	01.02.2016	01.02.2016	16	Direct	Tehsildar the Bank of Khyber.
12.	Mr. Shah Behram (BA)	20.11.1973	28.06.1997	15.12.2016	16	Promotee	AAC (OPS)
13.	Mr. Fiaz Ahmad Qureshi (BA)	12.04.1962	15.08.1982	15.12.2016	16	Promotee	AAC (OPS)
14.	Mr. Abdul Muqsit (MA)	20.01.1965	28.08.1988	15.12.2016	16	Promotee	AAC (OPS)
15.	Mr. Jehan Said (M.Com)	10.01.1964	28.08.1988	15.12.2016	16	Promotee	AAC (OPS)
16.	Mr. Sahib Zada (BA)	10.11.1961	04.09.1988	15.12.2016	16	Promotee	LAC (OPS) SNGPL
17.	Mr. Zahid Kamal (BA)	18.05.1964	01.03.1990	15.12.2016	16	Promotee	Tehsildar Khwezai
18.	Mr. Habib Ahmad Jan (MA)	01.03.1963	02.07.1987	15.12.2016	16	Promotee	AAC (OPS)
19.	Mr. Tahir Ashraf (MA)	24.01.1970	28.02.1988	16.11.2017	16	Promotee	RO PESCO Abbottabad
20.	Mr. Afsar Khan (BA)	10.04.1964	04.12.1989	06.04.2018	16	Promotee	Tehsildar Takhtbhai
21.	Mr. Abdul Qayum (BA)	20.02.1965	20.03.1988	16.11.2017	16	Promotee	Tehsildar Razar
22.	Muhammad Azam Khan (BA)	08.12.1959	14.07.1982	16.11.2017	16	Promotee	Tehsildar Charsadda
23.	Mr. Waheedullah (MA/LLB)	10.02.1973	20.09.1995	16.11.2017	16	Promotee	Tehsildar Puran
24.	Mr. Ajam Khan (BA)	15.06.1963	07.10.1987	16.11.2017	16	Promotee	Tehsildar Khar Bajaur.



25	Muhammad Javed (BA)	22.04.1966	25.09.1990	16.11.2017	16	Promotee	Tehsildar Havelian
26	Mr. Shah Nadeem (BSc)	02.04.1983	09.08.2004	16.11.2017	16	Promotee	Tehsildar Nowshera
27	Mr. Arshad Mehmood (MSC/LLB)	04.02.1967	17.09.1991	16.11.2017	16	Promotee	Tehsildar Mansehra
28	Muhammad Hasrat Khan (BA)	15.04.1968	17.09.1991	16.11.2017	16	Promotee	Tehsildar Khanpur
29	Mr. Niamatullah Kundi (BA)	22.09.1965	09.01.1992	16.11.2017	16	Promotee	Tehsildar Jehangira
30	Mr. Raja Tasawar Khan (BA)	15.04.1968	05.03.1992	16.11.2017	16	Promotee	Tehsildar Ghazi
31	Mr. Ishaq Ali Khan (BA)	14.10.1963	13.09.1992	16.11.2017	16	Promotee	Tehsildar Spinwain
32	Muhammad Zaman	04.01.1968	25.10.1992	16.11.2017	16	Promotee	Settlement Tehsildar Nowshera
33	Muhammad Imran Zaman (BA)	05.05.1979	23.04.2008	16.11.2017	16	Promotee	Tehsildar Swabi
34	Mr. Khalid Mansoor (MA)	10.03.1974	12.08.2008	16.11.2017	16	Promotee	At the disposal of Cmr Peshawar
35	Mr. Ahmad Hashmi (BA)	02.04.1983	02.02.2009	06.04.2018	16	Promotee	TOSD
36	Mr. Yadullah Khan Khattak(MA)	23.05.1979 Mardan	02.02.2009	17.01.2019	16	Promotee	Tehsildar Badhber
37	Muhammad Yar (MA)	02.02.1979 Malakand	02.02.2009	17.01.2019	16	Promotee	Tehsildar Matta
38	Mr. Mujahid Ali (MA)	19.04.1974	02.02.2009	06.04.2018	16	Promotee	Awaiting posting in BOR
39	Syed Abdul Akbar Shah (MSc/MA/M.Phil)	11.04.1981	02.02.2009	06.04.2018	16	Promotee	At the disposal of Cmr Peshawar
40	Mr. Rahim Shah (BA)	13.01.1969	03.09.1990	06.04.2018	16	Promotee	Tehsildar Thail
41	Mr. Muhammad Nawaz (MA)	25.12.1961	09.10.1980	06.04.2018	16	Promotee	Tehsildar Karrum
42	Mr. Farooq Shah (BA)	04.01.1961	01.12.1984	06.04.2018	16	Promotee	Reader to MBR-I
43	Mr. Muhammad Ayaz	20.02.1983	30.04.2009	17.01.2019	16	Promotee	Tehsildar CLCP Khyber
44	Syed Sultan Haider Shah (BA, LLB)	08.12.1972 Peshawar	02.02.2009	17.01.2019	16	Promotee	Tehsildar/Inspector Stamps Peshawar
45	Mr. Aftab Ahmad(MSc)	08.12.1982 Peshawar	02.02.2009	17.01.2019	16	Promotee	Tehsildar CLCP Khyber
46	Mr. Dil Nawaz Khan	22.03.1979 Swabi	02.02.2009	17.01.2019	16	Promotee	Tehsildar/Inspector Stamps Mardan
47	Mr. Kifayat Ullah(M.A)	09.01.1977 Peshawar	02.02.2009	17.01.2019	16	Promotee	Tehsildar Reconciliation Peshawar
48	Mr. Faqir Hussain (BA)	10.10.1983 Nowshera	02.02.2009	17.01.2019	16	Promotee	Settlement Tehsildar Mansehra
49	Mr. Zulfiqar Khan (M.Com)	15.04.1983 Peshawar	02.02.2009	17.01.2019	16	Promotee	Tehsildar PDA
50	Mr. Waqar Ahmad (M.A)	24.04.1980 Mansehra	02.02.2009	17.01.2019	16	Promotee	Tehsildar/Inspector Stamps Abbottabad
51	Muhammad Faraz Qurashi (MBA)	17.03.1982 Abbottabad	02.02.2009	17.01.2019	16	Promotee	Tehsildar Lora
52	Mr. Fazal ur Rehman (M.A)	10.07.1975 Haripur	02.02.2009	17.01.2019	16	Promotee	Tehsildar Baffa Pakhal
53	Mr. Farukh Jadoon (BSc)	04.05.1984 Abbottabad	02.02.2009	17.01.2019	16	Promotee	AAC(Rev) OPS Charsadda
54	Mr. Fayaz Ahmad (MA)	10.03.1982 Abbottabad	02.02.2009	17.01.2019	16	Promotee	Tehsildar LA

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57.	Mr. Ejaz Ahmad (M.A)	15.04.1976 Abbottabad	02.02.2009	17.01.2019	16	Promotee	Tehsildar Abbottabad
58.	Muhammad Salim (BSC)	03.05.1978 Abbottabad	02.02.2009	17.01.2019	16	Promotee	Tehsildar Oghi
59.	Mr. Adil Waseem (BA)	25.12.1988 Nowshera	27.02.2009	17.01.2019	16	Promotee	Tehsildar Madan
60.	Mr. Muhammad Yousaf	12.04.1964	22.04.1991	26.03.2019	16	Promotee	Tehsildar Molkaw
61.	Mr. Tanzil-ur-Rehman	13.02.1988 NWA	14.04.2009	26.03.2019	16	Promotee	Tehsildar Shah Alam
62.	Mr. Rab Nawaz (BA)	12.02.1964 Chitral	27.12.1983	26.03.2019	16	Promotee	Tehsildar Booni
63.	Mr. Abdul Qayum (BA)	24.04.1974 Kohistan	27.12.1993	26.03.2019	16	Promotee	Tehsildar Belrain
64.	Mr. Shaikat Iqbal (M.A)	2/11/1973 DIKhan	19.10.1992	26.03.2019	16	Promotee	Tehsildar Tank
65.	Mr. Abdur Rashid (MSC)	05.01.1962 Swabi	28.08.1988	26.03.2019	16	Promotee	Tehsildar Barikot
66.	Mr. Ahmad Ali M.A (B.ed)	17.04.1962 Swabi	28.08.1988	26.03.2019	16	Promotee	Tehsildar Gagra
67.	Mr. Gohar Ali (B.A)	31.03.1980 Bannu	29.05.2009	26.03.2019	16	Promotee	Tehsildar Bannu
68.	Mr. Sher Dil (BA)	24.01.1974 Kohistan	10.04.1995	26.03.2019	16	Promotee	Tehsildar Kotai Kohistan
69.	Muhammad Shoaib (BA)	01.01.1968 Kohat	09.12.1990	26.03.2019	16	Promotee	Tehsildar Kohat
70.	Mr. Muhammad Arshad (BA)	20.01.1967 Kohat	02.09.1984	26.03.2019	16	Promotee	Tehsildar Mahal Kurram
71.	Mr. Nawab Gul (M.A)	15.11.1966 Kohat	01.01.1995	26.03.2019	16	Promotee	Tehsildar Upper Orakzai

Certificate: Certified that the seniority list is final, notified, undisputed and attested.

SENIOR MEMBER
BOARD OF REVENUE

Worthy Chief Secretary
Khyber Pakhtunkhwa

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**REPRESENTATION / APPLICATION FOR PROMOTION AS
PMS BS-17**

Most respectfully it is submitted that we were appointed as Naib Tehsildar in the year 2009 through Public Service Commission. More than half of our batch mates have been promoted to the post of PMS BS-17. The promotion case of the applicants is still pending despite the fact that Board of Revenue has already forwarded the Working Papers of the applicants to the Establishment Department on 05/12/2019.

We were appointed as Naib Tehsildar in the year 2009 and promoted to the post of Tehsildar on 17/01/2019. On 14/02/2019 we were nominated for three weeks mandatory training which was completed on 13/12/2019. The probation period of one year has been completed on 17/01/2020. Furthermore the interview of 122 candidates for PMS on fresh appointment have been completed by the Public Service Commission and the result has been announced on 12/02/2020. If Public Service Commission considers our cases for promotion on regular basis as PMS BS-17, the newly recommended candidates for PMS will become senior and we will become junior to those 122 newly recommended PMS Officers.

In view of the above it is humbly requested to convene the meeting of PSB for considering the promotion case of the applicants on regular basis as PMS BS-17, please.

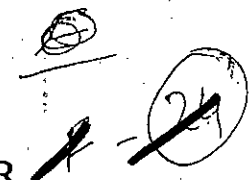
Yours faithfully

Sd/- M. A. Khan
10/6/20
14-02-2020

- 1. Mujahid Ali Tehsildar
- 2. Sultan Haidar Tehsildar
- 3. Khayatullah Tehsildar
- 4. Zulfikar Tehsildar
- and others

Forwarded to the
Additional Chief Secretary, Khyber Pakhtunkhwa
Senior Member, Board of Revenue, Khyber Pakhtunkhwa
Secretary to Government of Khyber Pakhtunkhwa, Establishment Department
Special Secretary, Establishment Department
Section Officer (E-II), Establishment Department

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IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2020

1. Aftab Ahmad S/O Javed Muhammad
Tehsildar, Citizen Loses
Compensation Program,
Bara District Khyber.
2. Faqir Hussain S/O Muhammad Younis,
Tehsildar, Board of Revenue,
Peshawar. Petitioners

VERSUS

1. Secretary, Govt. of KP;
Establishment Department,
Civil Secretariat, Peshawar.
2. Senior Member, Board of
Revenue, KP, Peshawar Respondents

⇄<=>⇄<=>⇄<=>⇄<=>⇄

**WRIT PETITION UNDER ARTICLE 199 OF
THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973.**

⇄<=>⇄<=>⇄<=>⇄<=>⇄

Respectfully Sheweth:

1. That petitioner's are performing their duties as Tehsildars B-16 District Khyber and Board of Revenue.
2. That petitioner's have 20% share in their cadre of Tehsildar for promotion to the post of Provincial Management Service (PMS B-17) and are eligible for promotion to the post of PMS B-17 with effect from 17-01-2020, but no process was initiated for the said purpose.



-28-

- f. That at present the departments have 53 vacancies of the post of PMS B-17 which cannot be kept vacant for indefinite period.
- g. That by not holding Meeting of PSB fixed for 20-02-2020 is based on malafide.

It is, therefore, most humbly prayed that on acceptance of the Writ Petition, in exercise of the extraordinary constitutional jurisdiction, this Hon'ble Court may graciously be pleased to:-

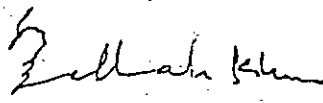
- a. Direct respondents to convene Meeting of PSB for promotion to the post of PMS B-17 with regard to 20% quota of Tehsildars B-17 as soon as possible but not later than a month;


AND/OR

- b. Any other writ/order/direction deemed proper and just in the circumstances of the case, be also issued/ordered/given.

INTERIM RELIEF:


By keeping in view the above facts and circumstance of the case, respondents be restrained from making direct recruitment to the post of PMS B-17 in their share till the final disposal of the case.

Petitioners
Through 
Saadullah Khan Marwat


Arbab Saif-ul-Kamal


Amjad Nawaz

Advocates,


Dated: 03-03-2020

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LIST OF BOOKS:

Constitution.

CERTIFICATE:

As per instructions of my client, no such like Writ Petition has earlier been filed on the same subject. (D.B Case)

[Handwritten Signature]
Advocate

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THE PESHAWAR HIGH COURT PESHAWAR

C.M. No. _____/2020
(impleadment)

IN

W.P. No.1861-P/2020

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-30-

Aftab Ahmad and another Petitioners

Versus

The Govt. of KPK and others Respondents

- 1/ Mujahid Ali, Tehsildar, presently Additional Assistant Commissioner Hangu, at Tall.
2. Syed Sultan Haider, Tehsildar, Additional Assistant Commissioner, Lakki Marwat.
3. Dil Nawaz, Additional Assistant Commissioner (OPS), Charsadda.
4. Zulfiqar Khan, Additional ACR (OPS), Bannu.
5. Hafiz Waqar, Tehsildar, Additional Assistant Commissioner (OPS), Shangla

..... Applicants

Application for impleadment of the applicants as Petitioners in the title of the Writ Petition.

Respectfully Sheweth,

1. That the titled Writ Petition is pending before the august Court and is scheduled for hearing on 09.06.2020.
2. That applicants are senior employees of the Revenue and Estate Department Government of Khyber Pakhtunkhwa serving as Tehsildars and presently posted against higher posts of BPS-17 on own-pay-scale basis. As per Service Rules 20% quota is reserved for promotion of Tehsildars to the post of PMS (BPS-17). It is pertinent to mention here that at the moment 53

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of PMS BPS-17 are lying vacant wherein on the basis of reserved promotion quota, applicants have to be promoted.

That the promotion cases of the applicants were processed and in view of seniority, eligibility and availability of vacancies, the working paper for the said purpose was also prepared by the Department and Meeting of PSB too was scheduled on 20.02.2020 but due to certain reasons, the meeting was postponed.

4. That the settled law is that the quota of promotion is to be first observed and then the quota for initial recruitment is to be followed. Since the Khyber Pakhtunkhwa Public Service Commission had advertised some 150 No. of PMS (BPS-17) posts and recruitment process was underway, therefore, the applicants approached the worthy Chief Secretary to finalize the promotion cases of the applicants as early as possible before the recommendation of the Public Service Commission who assured the applicants.
5. That inspite of the same the matter was delayed which prompted the other colleagues of the applicants to file the titled Writ Petition in the Hon'ble Court. The colleagues of applicants had sought the interim relief from the Hon'ble Court, however, only notice was given to the Department.
6. That to the misfortune of the applicants and due to the lethargic attitude of the Respondents fresh recruitment of 150 PMS (BPS-17) Officers was made landing the applicants in dire complications. The move has not only violated the fundamental rights of applicants but it has blocked the chances of applicants' promotion for coming decades which itself is a major punishment imposed upon applicants.
7. That identical question of facts and law are involved in the case of Petitioners as well as applicants, therefore, applicants are also necessary party and need impleadment in the panel of Petitioners in the titled Writ Petition. (Record of the applicants is attached)
8. That in light of the above, it would be in the interest of justice that the applicants be impleaded as petitioners in the titled writ petition.

It is therefore, humbly prayed that on acceptance of this application, the applicants may graciously be added as petitioners in the titled writ petition and also be granted the same relief as prayed for the petitioners in the same petition.

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Applicants

Through


Khaleed Rahman,
Advocate,
Supreme Court of Pakistan

&


Muhammad Amin
Ayub
Advocate, High Court

Dated: 08/06/2020

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Dated Peshawar the May 29, 2020

NOTIFICATION

NO.SOE-UCED/3(81)7020:- On the recommendations of the Khyber Pakhtunkhwa Public Service Commission, the competent authority is pleased to appoint the following candidates as officers of Provincial Management Service (PPS-17) (Rs.30370-2300-76370) subject to the terms & conditions mentioned hereunder :-

Sr.#	Name of candidate with father's name	District/Agency of domicile/Zone
1.	Mr. Tahroem Shah D/O Saad Sohail Shah	Abbottabad / 5
2.	Mr. Sajid Ullah S/O Rasool Shah	Karak / 4
3.	Mr. Ahmad Nasrullah Malik S/O Nasrullah Khan Malik	Hangu / 4
4.	Mr. Fida Hussain S/O Noor Hani Gul	Swat / 3
5.	Mr. Faisal Ismail S/O Muhammad Ismail	Swat / 3
6.	Syed Mehar Ali Shah S/O Syed Muhammad Ali Shah	Dir Lower / 3
7.	Mr. Muhammad Sohail S/O Muhammad Umer	Mulakand / 3
8.	Ms. Farangis Azim D/O Muhammad Azim Khan	Peshawar / 2
9.	Mr. Alta Ullah S/O Sultan Mughal	Peshawar / 2
10.	Mr. Atif Afridi S/O Muhammad Khurshid Afridi	Khyber / 1
11.	Ms. Navaira Farooq D/O Muhammad Farooq	Huripuz / 5
12.	Mr. Aamir Zoh S/O Alamzeb	Chersadda / 2
13.	Mr. Sadiq Ali S/O Muhammad Ismail	Chersadda / 2
14.	Mr. Tauzeeq ur Rehman S/O Sana ur Rehman	Peshawar / 2
15.	Mr. Muhammad Amir Khan S/O Sharif Ullah	Nowshera / 2
16.	Mr. Sheraz Rashid Ahmad Khan S/O Rashid Ahmad Khan	Lakki Marwat / 4
17.	Syed Muhammad Arslan S/O Mutahir Shah	Chersadda / 2
18.	Mr. Muhammad Bilal Naseer S/O Naeir Muhammad Khan	Swabi / 2
19.	Mr. Muhammad Fayaz S/O Muhammad Iqbal	Chersadda / 2
20.	Mr. Khalid Imran S/O Gul Nawab Khan	South Waziristan / 1
21.	Mr. Zayed Khan Safi S/O Ihsanullah Khan Safi	Mohmand / 1
22.	Mr. Muhammad Burq/Awan S/O Tariq Awan	Mansohra / 5
23.	Syeda Zainab Naqvi D/O Syed Ali Anjum Naqvi	Peshawar / 2
24.	Mr. Anis ur Rehman S/O Muhammad Dost	Chitral / 3
25.	Mr. Rizq Ali S/O Mehmood Khan	South Waziristan / 1
26.	Mr. Wasim Ullah Khan Khattak S/O Nasim Khan Nasim	Karak / 4
27.	Ms. Sorja Naz D/O Niaz Muhammad Khan	Nowshera / 2
28.	Mr. Shayan Ali S/O Muhammad Ali	Peshawar / 2
29.	Mr. Kabir Ahmad Khan S/O Bakhtyar	Swat / 3
30.	Mr. Adnan Khan S/O Muhammad Jan Mohtand	Mohtand / 1
31.	Mr. Sohail Ahmad Shah Bukhari S/O Sher Ahmad Shah Bukhari	D.I. Khan / 4
32.	Mr. Fahd Zia S/O Zia ul Islam	Mansohra / 5
33.	Mr. Khayyam Nasir S/O Mirza Khan	Mohtand / 1

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34.	Mr. Haroon Salim S/O Muhammad Salim Khan	South Waziristan / 1
35.	Mr. Khizar Faiz S/O Faiz ur Rab	Swabi / 2
36.	Ms. Suna Shah D/O Syed Yousaf Shah	Munsehra / 5
37.	Mr. Asfandyar Khalid S/O Khalid Khan	Peshawar / 2
38.	Mr. Shahid S/O Ilam Shah	Kohat / 4
39.	Mr. Muhammad Ali S/O Miun Bahadar	Malakand / 3
40.	Mr. Inam Ullah S/O Asal Mir	North Waziristan / 1
41.	Mr. Awais Khan S/O Hidayat Ullah Khan	Mohmand / 1
42.	Mr. Sheroze Mufti S/O Mufti Attaullah Jan	Peshawar / 2
43.	Mr. Junaid Akbar Marwat S/O Muhammad Akbar Khan	Peshawar / 2
44.	Mr. Muhammad Shahbaz Khan S/O Ghulam Asif Khan	Peshawar / 2
45.	Mr. Irshad ul Haq S/O Ihsan ul Haq	Malakand / 3
46.	Mr. Muhammad Fasilh Ishaq Abbasi S/O Muhammad Ishaq Abbasi	Abbottabad / 5
47.	Mr. Shahab Ahmad Khan S/O Shah Naraz Khan	Lakki Marwat / 4
48.	Mr. Junaid Khalid S/O Muhammad Khalid	Abbottabad / 5
49.	Mr. Amir Mustafa S/O Abduljabbar	Peshawar / 2
50.	Mr. Munir Ahmad Khan S/O Sharif Khan	Mohmand / 1
51.	Ms. Tania Shaheen D/O Muhammad Shaheen	Abbottabad / 5
52.	Syed Yasir Ali Shah S/O Shoukat Ali Shah	Peshawar / 2
53.	Mr. Muhammad Sohail Khan S/O Rajwali Khan	Nowshera / 2
54.	Ms. Mariam Hameed D/O Hameed Khan	Swabi / 2
55.	Mr. Salimullah Khan Ayubi S/O Amanullah Khan	Chitral / 3
56.	Mr. Kamran Khan S/O Farman Ullah	Malakand / 3
57.	Mr. Muhammad Hamid Siddique S/O Muhammad Siddique	Abbottabad / 5
58.	Mr. Saad Muneer S/O Muneer Ahmad	Munsehra / 5
59.	Ms. Sameera Saba D/O Wilayat Shah	Peshawar / 2
60.	Mr. Bilal Nasir S/O Nasir Ali	Mohmand / 1
61.	Mr. Sultan Noor ul Din Ahmar S/O Sultan Noor Ahmad	D.I. Khan / 4
62.	Mr. Luqman S/O Abdul Qadus	Tribal Sub Division Bannu / 1
63.	Mr. Muhammad Ahsan Tahir S/O Muhammad Tahir Farooq	Kohat / 4
64.	Mr. Allah Nawaz S/O Abdul Haseeb	Bajaur / 1
65.	Mr. Shahidullah S/O Ghani ur Rehman	Mardan / 2
66.	Mr. Shakeel Ahmad S/O Shah Zada	Bajaur / 1
67.	Mr. Hazrat Bilal S/O Hazrat Jamal	Mardan / 2
68.	Mr. Amir Ullah Khan S/O Shah Teman Khan	Tribal Sub Division Bannu / 1
69.	Mr. Riyaz Ahmad S/O Abdul Hamid Khan	Chitral / 3
70.	Mr. Sikandar Afzal S/O Alamgeer Khan	Charsadda / 2
71.	Mr. Usman Hamza S/O Yaqoob Khan	Peshawar / 2
72.	Mr. Aftab Alam S/O Shah Muslim	Malakand / 3
73.	Mr. Naseer Abbas (Khali) S/O Nausherawan	Peshawar / 2
74.	Mr. Muhammad Saqib S/O Gulzar Muhammad	Mardan / 2
75.	Mr. Noor Nawaz S/O Zerab Gul	Bajaur / 1
76.	Mr. Zarak Yar Khan Toru S/O Hanifullah Khan Toru	Mardan / 2
77.	Mr. Baqir Ali S/O Zulfiqar Ali	Mardan / 2
78.	Mr. Muhammad Idrees Khan S/O Saeed ur Rehman	Charsadda / 2
79.	Mr. Adnan Mumtaz S/O Mumtaz Khan	Karak / 4
80.	Mr. Noman Pervaiz S/O Muhammad Pervaiz	Swat / 3
81.	Ms. Milsbah Waheed D/O Abdul Waheed Khan	Abbottabad / 5
82.	Syed Ahsan Ali Shah S/O Syed Liaqat Shah	Haripur / 5

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83.	Mr. Junaid Shah S/O Bahramand	Mulakand / 3
84.	Mr. Zeeshan Najeeb S/O Najeeb Ullah	Peshawar / 2
85.	Mr. Ishfaq Ahmad S/O Said Muhammad	Bujaur / 1
86.	Mr. Shah Nawaz Khan S/O Wali Muhammad	Nowshera / 2
87.	Ms. Nafasha Sumbal D/O Afsar Said	Mardan / 2
88.	Mr. Naveed Ahmed S/O Azizullah	Chitral / 3
89.	Mr. Umar Mukhtar S/O Ahmed Mukhtar	Peshawar / 2
90.	Ms. Mariam Burki D/O Munir Jun	South Waziristan / 1
91.	Mr. Muhammad Faizan Zeb S/O Aurangzeb	Abbottabad / 5
92.	Mr. Fawad Ahmad Khan S/O Mohabat Khan	Peshawar / 2
93.	Ms. Sabeeha Hastam D/O Hastam Khan	Mardan / 2
94.	Mr. Aftab Ahmed S/O Muhammad Shuaib	Swat / 3
95.	Ms. Khula Haqdar D/O Muhammad Haqdar	Charsadda / 2
96.	Mr. Muhammad Ali S/O Muhammad Khurshid	Abbottabad / 5
97.	Ms. Sohny Saleem D/O Muhammad Saleem	D.I. Khan / 4
98.	Mr. Ramiz Ali Shah S/O Rifaqat Shah	Abbottabad / 5
99.	Mr. Umar Ahmad Khilran S/O Ghulam Ahmad	Tank / 4
100.	Mr. Aimal Khan S/O Muhammad Ilyas	Dir Lower / 3
101.	Mr. Jamshed Alam Khan S/O Muhammad Nawaz	Lakki Marwat / 4
102.	Ms. Haseena Khan D/O Baillullah Khan	Bunnu / 4
103.	Mr. Sahaulah S/O Ghulam Rehman	Dir Lower / 3
104.	Ms. Brokhna Habib D/O Quzi Habib ul Haq	Nowshera / 2
105.	Mr. Nadir Nazar S/O Akbar Khan	Chitral / 3
106.	Mr. Nasir Ali S/O Abdul Ahad	Buner / 3
107.	Mr. Saddam Hussain S/O Jamshed Khan	Molund / 1
108.	Ms. Madecha Khan D/O Nisar Khan	Swabi / 2
109.	Ms. Nayab Abbasi D/O Khalig Dad Abbasi	Abbottabad / 5
110.	Mr. Shah Wali Khan S/O Saif Ullah Khan	South Waziristan / 1
111.	Mr. Waseem Yousuf Khan Khattak S/O Muhammad Yousuf Khan	Karak / 4
112.	Ms. Samia Jabeen D/O Muhammad Sharif	Lakki Marwat / 4
113.	Ms. Samira Mahsood D/O Abdul Hakeem Jan Mahsood	South Waziristan / 1
114.	Ms. Shagufta Sarwar D/O Hakim Sarwar	Chitral / 3
115.	Ms. Sana Fatima D/O Syed Wajid Ali	Abbottabad / 5
116.	Ms. Sahar Anwar Khan D/O Muhammad Anwar	Swabi / 2
117.	Ms. Sanovia Kakar D/O Shad Purvez	Peshawar / 2
118.	Ms. Misbah Khalid D/O Khalid Khan	Manshra / 5
119.	Ms. Sara Humayoun D/O Muhammad Humayoun	Swat / 3
120.	Ms. Shawana Haleem D/O Rohaleem Jan	Bajaur / 1
121.	Ms. Christina Zeb ul Nisa Feroz D/O Sikandar Feroz	Peshawar / 2
122.	Mr. Fawad Ahmad S/O Khosh Wali	Chitral / 3
123.	Mr. Adnan Haider Malooni S/O Abdur Rashid Khan	Peshawar / 2

TERMS & CONDITIONS

- a) They shall be governed by the Khyber Pakhtunkhwa Civil Servants Act 1973 and the Rules made thereunder.
- b) The appointed officers shall remain on probation for a period of one year, in terms of Section 6(1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 which is extendable for another year with the specific orders of appointing authority within two months of the expiry of first year of probation period as specified in Rule-15(2) of the rules ibid.

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- c) Their services will be liable to termination at any time without assigning any reason before the expiry of the period of probation/extended period of probation. If their performance during this period is not found satisfactory. In such an event, they will be given one month prior notice of termination from service or one month pay in lieu thereof. In case they wish to resign at any time, one month prior notice shall be necessary or in lieu thereof, pay for one month shall be forfeited.
- d) They will not be entitled to any TA/DA on their first appointment as Provincial Management Service (BS-17) officers.

2- If the above terms & conditions are acceptable to them, they should report to the Director General, Pakistan Provincial Services Academy, Peshawar on 02nd June, 2020 (P.N).

**CHIEF SECRETARY
KHYBER PAKHTUNKHWA**

ENDST. NO. AND DATE EVEN.

A copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Pakistan Provincial Services Academy, Peshawar with reference to letter No. PPSA/TRG/C-86/939, dated: 19.05.2020.
3. Director Examination, Khyber Pakhtunkhwa Public Service Commission, 2 Fort Road Peshawar Cantt with reference to letter No. PSC-PMS-EX/AM-2018/004947 dated: 28.02.2020.
4. Deputy Secretary (Admn.), Administration Department.
5. SO(Secret)/SO(Admn)/S.O.(Budget)/E.O/Programmer/Librarian, E&AD.
6. PS to Chief Secretary, Khyber Pakhtunkhwa.
7. PS to Secretary Establishment Department.
8. PS to Secretary Administration Department.
9. PS to Secretary Finance Department.
10. PS to Special Secretary(Estt), Establishment Department.
11. PA to Deputy Secretary(Estt) Estt. Dept.
12. Manager, Govt. Printing Press Peshawar.
13. All candidates concerned.
14. Office order file.

(Signature) (29/5/2020)
C (SHAJBAZ KHATK) SECTION OFFICER (E-II)

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ITEM NO (03)

ESTABLISHMENT DEPARTMENT
(Meeting of PSB held on 09.06.2020)

SUBJECT: - PROMOTION OF TEHSILDARS BS-16 TO THE POST OF PMS BS-17

Secretary Establishment apprised the Board that number of posts falling to the share of Tehsildar to PMS BS-17 is 153 where 98 officers are already working. Hence 55 posts of PMS BS-17 are lying vacant. The Board considered promotion against 53 posts by excluding 02 posts vacated due to conditional retirement of the officers in wake of Peshawar High Court judgment dated 19.02.2020.

2. According to the Provincial Management Service Rules, 2007, the posts of PMS in BS-17 falling in the share of Tehsildars are required to be filled as under:-

"Twenty percent from amongst Tehsildars who are graduates, on the basis of seniority cum fitness having three years service as Tehsildar/ Naib Tehsildar and have undergone a training course of 9 weeks at the Pakistan Provincial Services Academy or Provincial Staff Training Institute"

3. The service record of the officers included in the panel were discussed as follows:-

S#	NAME OF OFFICER	RECOMMENDATIONS OF THE BOARD
1.	Mr. Muhammad Ikramullah.	His date of birth is 9.3.1965. He joined government service on 1.7.1995. He was promoted as Tehsildar BS-16 on 6.9.2008. The Board was informed that a case is pending against him in Anti Corruption Court. Besides his PER for the year 2015 to 2019 are also not available. The Board recommended to defer his promotion.
2.	Mr. Kiramatullah.	His date of birth is 20.1.1961. He joined government service on 8.1.1981. He was promoted as Tehsildar BS-16 on 6.9.2008. The Board was informed that he opted to forego his promotion twice, once on 02.01.2012 and again on 14.11.2017. His case was considered in terms of Rule 7(5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 which provides that if a civil servant declines to avail the benefit of promotion for

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		<p>prescribed length of service for promotion. No inquiry is pending against him. His PER dossier is complete. His service record upto 2019 is generally good.</p> <p>The Board recommended the officer for promotion to PMS BS-17 on regular basis. He will be on probation for a period of one year.</p>
	Mr. Aftab Ahmed.	<p>His date of birth is 08.12.1982. He joined government service on 02.02.2009. He was promoted from Naib Tehsildar as Tehsildar on 17.01.2019. He has undergone mandatory training for promotion. He has completed prescribed length of service for promotion. No inquiry is pending against him. His PER dossier is complete. His service record upto 2019 is generally good.</p> <p>The Board recommended the officer for promotion to PMS BS-17 on regular basis. He will be on probation for a period of one year.</p>
44.	Mr. Dil Nawaz Khan.	<p>His date of birth is 22.03.1979. He joined government service on 02.02.2009. He was promoted from Naib Tehsildar as Tehsildar on 17.01.2019. He has undergone mandatory training for promotion. He has completed prescribed length of service for promotion. No inquiry is pending against him. His PER dossier is complete. His service record upto 2019 is generally good.</p> <p>The Board recommended the officer for promotion to PMS BS-17 on regular basis. He will be on probation for a period of one year.</p>
45.	Mr. KifayatUllah.	<p>His date of birth is 09.01.1977. He joined government service on 02.02.2009. He was promoted from Naib Tehsildar as Tehsildar on 17.01.2019. The Board was informed that he was removed from service in a disciplinary proceedings and on acceptance his appeal by Service Tribunal, he was conditionally reinstated into services as Niab Tehsildar subject to the final decision of pending CPLA in the Supreme Court of Pakistan. Similarly his promotion as Tehsildar on 17.01.2019 was also conditional subject to the said CPLA.</p>

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		<p>The Board therefore, decided to wait for the outcome of CPLA and keep him under watch till then.</p>
46.	Mr. Faqir Hussain.	<p>His date of birth is 10.10.1983. He joined government service on 02.02.2009. He was promoted from Naib Tehsildar as Tehsildar on 17.01.2019. He has undergone mandatory training for promotion. He has completed prescribed length of service for promotion. No inquiry is pending against him. His PER dossier is complete. His service record upto 2019 is generally good.</p> <p>The Board recommended the officer for promotion to PMS BS-17 on regular basis. He will be on probation for a period of one year.</p>
47.	Mr. Zulfiqar Khan.	<p>His date of birth is 15.04.1983. He joined government service on 02.02.2009. He was promoted from Naib Tehsildar as Tehsildar on 17.01.2019. He has undergone mandatory training for promotion. He has completed prescribed length of service for promotion. No inquiry is pending against him. His PER dossier is complete. His service record upto 2019 is generally good.</p> <p>The Board recommended the officer for promotion to PMS BS-17 on regular basis. He will be on probation for a period of one year.</p>
48.	Mr. Waqar Ahmad.	<p>His date of birth is 24.04.1980. He joined government service on 02.02.2009. He was promoted from Naib Tehsildar as Tehsildar on 17.01.2019. He has undergone mandatory training for promotion. He has completed prescribed length of service for promotion. No inquiry is pending against him. His PER dossier is complete. His service record upto 2019 is generally good.</p> <p>The Board recommended the officer for promotion to PMS BS-17 on regular basis. He will be on probation for a period of one year.</p>

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Dated Peshawar, the July 02, 2020

NOTIFICATION

NO.SOE.II(ED)2(192)2020: The Competent Authority, on the recommendations of the Provincial Selection Board in its meeting held on 09.06.2020, is pleased to promote the following Tehsildars (BS-16) to the post of Provincial Management Service (BS-17), on regular basis with immediate effect:-

S.No.	NAME OF OFFICERS	PRESENT POSTING
01.	Mr. Hidayatullah	Additional Assistant Commissioner-II (OPS), Bannu
02.	Mr. Abdur Rehman Shah	Awaiting for posting in Establishment Department.
03.	Syed Mir Laiq Shah	Tehsildar, Board of Revenue.
04.	Mr. Muhammad Junaid	Additional Assistant Commissioner-III (OPS), Bannu
05.	Mr. Shah Behram	Additional Assistant Commissioner-II (OPS), Daraban, D.I.Khan.
06.	Mr. Faiz Ahmad Qureshi	Additional Assistant Commissioner-II (OPS), Chitral
07.	Mr. Abdul Muqsit	Additional Assistant Commissioner (Razar) (OPS), Swabi.
08.	Mr. Jehan Said	Additional Assistant Commissioner-I (OPS), Charsadda
09.	Mr. Sahib Zada	Land Acquisition Collector (OPS), SNGPL on deputation basis.
10.	Mr. Zahid Kamal	Tehsildar, Board of Revenue.
11.	Mr. Habib Ahmad Jan	Asstt to Commissioner (Pol/Dev.) (OPS), Malakand Division.
12.	Mr. Muhammad Yar	Additional Assistant Commissioner-VIII (Matta), (OPS) Swat.
13.	Syed Sultan Haider Shah	Additional Assistant Commissioner-I (OPS), Lakki Marwat
14.	Mr. Aftab Ahmad	Additional Assistant Commissioner (OPS), Jamrud.
15.	Mr. Dil Nawaz Khan	Additional Assistant Commissioner, Shabqadar (OPS) Charsadda.
16.	Mr. Faqir Hussain	Additional Assistant Commissioner-III (OPS), Charsadda
17.	Mr. Zulfiqar Khan	Additional Assistant Commissioner (Rev) (OPS), Bannu.
18.	Mr. Waqar Ahmad	Additional Assistant Commissioner (OPS), Kolai Pallas.

Contd...Page-2

ATTESTED

ATTESTED

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2. The Officers on promotion shall remain on probation for a period of one year extendable for another year, in terms of Section-6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

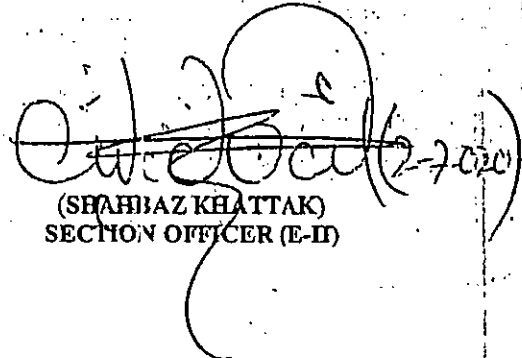
3. The officer mentioned at S.No. 01, 04 to 08 and 11 to 18 are allowed to actualize their promotion against their already occupied posts. However, posting / transfer notification in respect of officers mentioned at S.No. 02, 03, 09 & 10 will be issued later on.

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

ENDST: NO. & DATE EVEN

A copy is forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
4. All Concerned Commissioners.
5. Accountant General, Khyber Pakhtunkhwa.
6. All Concerned Deputy Commissioners.
7. All concerned District Accounts Officers.
5. Deputy Director (I.T), Administration Department with request to upload the Notification on official website.
6. S.O (Secret) / S.O (Admn) / E.O, E&A Department.
7. PS to Chief Secretary, Khyber Pakhtunkhwa.
8. PS to Secretary, Establishment Department
9. Officers concerned.
10. Office order file.
11. Personal files of the officers concerned.


(SHAHBAZ KHATTAK)
SECTION OFFICER (E-II)

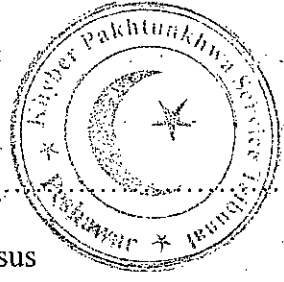
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 12885/2020

Mr. Mujahid Ali,
Additional Assistant Commissioner,
Hangu at Tall.....



Versus

Appellant
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11853

Dated 21/10/2020

1. The Govt. of Khyber Pakhtunkhwa
through Chief Secretary,
Civil Secretariat, Peshawar.

2. The Secretary
Govt. of Khyber Pakhtunkhwa
Establishment Department,
Civil Secretariat, Peshawar.

3. The Senior Member Board of Revenue,
Khyber Pakhtunkhwa, Peshawar..... Respondents

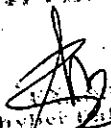
SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 02.07.2020 WHEREBY APPELLANT WAS DEFERRED FROM PROMOTION AGAINST THE POST OF PMS (BPS-17) AGAINST WHICH HE PREFERRED DEPARTMENTAL APPEAL BUT THE SAME WAS UNLAWFULLY REGRETTEED VIDE IMPUGNED APPELLATE ORDER DATED 30.09.2020.

PRAYER:

On acceptance of the instant appeal, the impugned Notification dated 02.07.2020 and impugned appellate order dated 30.09.2020 may graciously be set aside and appellant be promoted against the post of PMS (BPS-17) w.e.f. 20.02.2020 with consequential back benefits.

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

ATTESTED

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. 12885/2020

Date of Institution ... 21.10.2020

Date of Decision ... 25.02.2021



Mr. Mujahid Ali, Additional Assistant Commissioner, Hangu at Tall.

... (Appellant)

VERSUSThe Govt. of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat,
Peshawar and two others. ... (Respondents)Present:MR. KHALID REHMAN,
Advocate

--- For Appellant.

MR. MUHAMMAD RASHEED,
Deputy District Attorney

--- For respondents.

MR. MIAN MUHAMMAD
MR. HAMID FAROOQ DURRANI,--- MEMBER (Executive)
--- CHAIRMANJUDGEMENT.

MIAN MUHAMMAD, MEMBER (E):- Notification dated 02.07.2020 and appellate order dated 30.09.2020 on the appeal of appellant have been assailed and impugned under Section-4 of the Khyber Pakhtunkhwa Services Tribunal Act, 1974.

FACTS.

02. Brief facts, as per memorandum of appeal, are that the appellant was inducted in service as Naib Tehsildar (BS-14) in 2009 and subsequently promoted as Tehsildar (BS-16) on 06.04.2018. The Provincial Selection Board in its meeting dated 09.06.2020 deferred his promotion on the ground of general reputation of being corrupt, incompetent and indifferent to his official responsibilities.

INVESTED

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Recommendations of the PSB in respect of clear cases were notified on 02.07.2020 which was represented by the appellant through a departmental appeal but the competent authority rejected the same on 30.09.2020, hence the instant service appeal on 21.10.2020.

03. We have heard the parties through their authorized legal counsels and gone through the available record minutely and detailed.

ARGUMENTS.

04. Learned counsel for the appellant argued that the PSB could not convene its scheduled meeting on 20.02.2020 when the appellant was on the panel of officers for consideration to be promoted to BS-17 in Provincial Management Service. It was therefore not his fault and as such was eligible for promotion from that date due to availability of vacancy falling in quota reserved for promotion at that very point of time. As a result of not convening meeting of the PSB, 123 direct recruits in BS-17 (PMS) recommended by the Public Service Commission were notified on 29.05.2020 rendering the appellant to become junior to them. He pleaded that as per principle vacancy in a cadre or service group will have to be filled from promotion quota first and then in direct or initial quota. He quoted Section-9 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-7(3) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 as well as para-V(a) of the Promotion Policy and submitted that deferment is recommended when inter-se-seniority is disputed/subjudice, disciplinary/departmental proceedings are pending or PER dossier of an officer is incomplete. The appellant was not hit by any of the category of deficiency and as such he was by all means eligible for promotion to BS-17. It was further contended that the appellant has been condemned unheard because no formal enquiry has been

ATTESTED



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conducted against him on the allegation/remarks recorded by the PSB in its minutes of the meeting dated 09.06.2020. The general reputation of being a corrupt officer is unfound and evasive term because there is no evidence in support of the claim against the appellant. His ACR's throughout his service career have no negative or adverse entry and even his reporting officer (Settlement Officer Nowshera) has given him good ACR's for 2018. To strengthen his arguments the learned counsel for the appellant placed reliance on order No. XX of Supreme Court Rules 1980, 1993 SCMR 2258, 2003 PLC (CS)503, 2006 SCMR 1938 and 2010 PLC (C.S) 760.

05. Learned Deputy District Attorney contradicted the arguments of learned counsel for the appellant and raised preliminary objection on maintainability of the service appeal under Section-4 (b)(i) that determining the suitability of an officer for a particular post falls in the domain of DPC/PSB and as such the Services Tribunal has no jurisdiction on such issues to be adjudicated upon. Reliance was placed on case law reported as 2005 SCMR 1742, PLD 2008 Supreme Court 769.

CONCLUSION.

06. It is observed that ACR or performance evaluation report is an authentic service document reflecting on the performance of an officer keeping in view objectivity and not subjectivity by the Reporting Officer in such annual reports. In case, there were instances of inefficiency, misconduct or corruption, the same must have been put in black and white and communicated to the officer reported upon as per procedure and instructions contained in para-4.1 and 4.2 on "Instructions on Performance Evaluation Report 2006". In the instant case the officer has been deferred for promotion to BS-17 on the ground of "his general reputation of being corrupt, incompetent and indifferent to his official responsibilities, as reported by the District Collector Nowshera during his posting as Settlement Tehsildar

ATTESTED



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Nowshera". However, the officer was working under the direct supervision of Settlement Officer Nowshera who in ACR for the period 01.01.2016 to 30.03.2017 has termed him "a trust worthy officer who knows his job". The remarks of PSB are adverse in nature but neither substantiated with valid documents nor duly communicated to the appellant. The general reputation of officer being corrupt is therefore not based on some credible documentary evidence and as such has no ground to be maintained.

7. Without touching the facts, circumstances and merits of the case the question of jurisdiction comes in the way of adjudication under Section-4 (b)(i) which stipulates that:-

(b) "no appeal shall lie to a Tribunal against an order or decision of a departmental authority determining---

(i) the fitness or otherwise of a person to be appointed to or hold a particular post or to be promoted to a higher post or grade.

We understand that the Provincial Selection Board met on 09.06.2020 to determine the fitness or otherwise of the officers on penal for consideration to be promoted to next higher scale i.e from BS-16 to BS-17 and scrutiny of the documents/service record was the prime and sole criteria before the PSB which the forum did take into consideration before making its recommendations to the competent Authority for approval. As this Tribunal is hit by the above mentioned provision of law, the service Appeal in hand is therefore, dismissed. Parties are left to bear their respective costs. File be consigned to the record room.

ANNOUNCED
25.02.2021

(MIAN MUHAMMAD)
MEMBER(E)

(HAMID FAROOQ DURRANI)
CHAIRMAN

Certified to be true copy
Khushal



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**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)**

Dated Peshawar the 15th April, 2022

NOTIFICATION

NO.SOE(E.III)E&AD/2(192)2022 :- The Competent Authority (Chief Minister Khyber Pakhtunkhwa) on the recommendation of Provincial Selection Board, in its meeting held on 07/04/2022, is pleased to promote the following (PMS BS-17 a.c.b) to PMS (BS-17) on regular basis with immediate effect:-

S.#	Name of Officer	Place of Posting
1.	Mr. Gohar Ali	Settlement Officer (OPS), Malakand
2.	Mr. Muhammad Ayaz	Additional Assistant Commissioner (Lahor-II), Swabi
3.	Mr. Kifayat Ullah	Additional Assistant Commissioner, Charsadda
4.	Muhammad Yousaf	Additional Assistant Commissioner, Lower Khurram
5.	Mr. Rab Nawaz	Additional Assistant Commissioner (Booni) Upper Chitral (Mulkhow Torkhow)

2. The promotion in respect of Mr. Kifayat Ullah (PMS BS-17) will be subject to final outcome of CPLA pending in Supreme Court of Pakistan.

3. The officers on promotion will remain on probation for a period of one year, in terms of Section-6(2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and extendable for another year with the specific orders of appointing authority within two months of the expiry of first year of probation period as provided in rule-15(2) of rules ibid.

4. Posting / transfer notification in respect of the above officers will be issued separately.

[Handwritten signature]
15/04/2022
Chief Officer
Establishment &
Administration Dept.

**CHIEF SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA**

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**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)**

Copy of the above is forwarded to the:-

1. Additional Chief Secretary, Khyber Pakhtunkhwa.
2. Senior Member Board of Revenue, Khyber Pakhtunkhwa
3. Principal Secretary to Governor, Khyber Pakhtunkhwa
4. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa
5. All Divisional Commissioners, Khyber Pakhtunkhwa.
6. All concerned Deputy Commissioners, Khyber Pakhtunkhwa.
7. Accountant General, Khyber Pakhtunkhwa.
8. Concerned District Accounts Officers, Khyber Pakhtunkhwa.
9. Manager Govt: Printing Press
10. Section Officers (Admin) (Secret), P.S.B & Estate Officer E&A Departments
11. PS to Chief Secretary, Khyber Pakhtunkhwa
12. PS to Secretary Establishment Department
13. PS to Special Secretaries (Estt / Reg) Establishment Department
14. PA to Additional Secretaries (Estt/Reg/HRD), Establishment Department
15. Officers concerned for necessary action under intimation to this section.
16. Office Order File

M. Irfan Usman 15/04/2022
(MUHAMMAD IRFAN USMAN)
SECTION OFFICER (E-II)
ESTABLISHMENT DEPARTMENT

Deputy Officer (E-II)
Establishment &
Administration Deptt

To

The Worthy Chief Minister,
Khyber Pakhtunkhwa,
Chief Minister's Secretariat, Peshawar.

200/11/49 -

Through Proper Channel

Subject: DEPARTMENTAL APPEAL/ REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION DATED 15.04.2022 WHEREBY THE APPELLANT HAS BEEN PROMOTED TO THE POST OF PMS OFFICER (BPS-17) WITH IMMEDIATE EFFECT INSTEAD OF 20.02.2020.

Respected Sir,

1. That the appellant is the employee of respondent Department and serving as Additional Assistant Commissioner (BPS-17) at Charsadda, District Charsadda quite efficiently and up to the entire satisfaction of his superiors.
2. That the appellant while serving as Tehsildar (BPS-16), the respondent Department issued a list in respect of panel of Tehsildars for consideration to the next higher scale i.e. PMS (BPS-17) wherein name of the appellant was placed at Serial No.47 in the ibid list.
3. That through letter dated 18.02.2020 the Provincial Selection Board (PSB) was scheduled to be held on 20/02/2020 but unfortunately the meeting was postponed due to the decision of Peshawar High Court, setting aside the Act of Provincial Assembly enhancing the age of retirement to 63 years. That working papers in respect of promotion of Tehsildar BPS-16 to the post of PMS Officer BPS-17 was prepared whereafter the Seniority list of the eligible Tehsildars (BPS-16) was issued wherein the appellant was placed at Serial No.47.
4. That since the appellant apprehended that the nominees of the Khyber Pakhtunkhwa Public Service Commission would be appointed, therefore, the appellant preferred a representation/application before the worthy Chief Secretary Khyber Pakhtunkhwa, Peshawar to convene/conduct the PSB as soon as possible for promotion to the post of PMS BPS-17 but the same could not be held.
5. That feeling aggrieved the appellant knocked the door of Peshawar High Court in writ petition No.2520-P/2020, but during the pendency of the mentioned writ petition, department appointed the private respondents as PMS Officers (BPS-17) on the recommendation of the Public Service Commission vide Notification dated 29.05.2020.
6. That subsequently PSB meeting was held on 09.06.2020 and the respondent department promoted the other colleagues of the appellant to the post of PMS Officer (BPS-17) on regular basis vide Notification dated 02.07.2020.
7. That the appellant aggrieved from the ibid notification dated 02.07.2020 filed departmental appeal which was rejected vide order dated 22.09.2020 followed by the service appeal No.12449/2022 before the Khyber Pakhtunkhwa Service Tribunal which was dismissed on the ground of jurisdiction vide order dated 25.02.2021.
8. That the appellant filed writ petition No.1275-P/2021 before the Honorable Peshawar High Court, Peshawar against the notification dated 02.07.2020, but

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to the post of PMS BPS-17 on the regular basis with immediate effect instead of 20.02.2020 when the first meeting of PSB was scheduled for the promotion of the appellant with other colleagues to the post of PMS BPS-17 Officer, that on production of impugned order by the respondent department, the appellant sought withdrawal of the instant writ petition which was allowed on 17.05.2022.

9. That the appellant feeling aggrieved from the impugned notification dated 15.04.2022 prefers departmental appeal before the competent authority.

It is therefore most humbly prayed that acceptance of this representation/appeal the impugned notification dated 15.04.2022 may kindly be modified/rectified to the extent of the appellant and he may kindly be promoted to the post of PMS (BPS-17) w.e.f. 20.02.2020 instead of 'with immediate effect' with all back benefits including seniority.

Dated: 15/9/2022

Yours Obediently



MUJAHID ALI
ADDITIONAL ASSISTANT COMMISSIONER,
(REVENUE), DISTRICT CHARSADDA.

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VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO: _____ OF 20____

Mujahid Aeri

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt of KPIC & others

(RESPONDENT)
(DEFENDANT)

I/We (Appellant)

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

Dated. _____/_____/202


CLIENT

ACCEPTED
NOOR MOHAMMAD KHATTAK
(BC-10-0853)
15401-0705985-5


UMAR FAROOQ


WALEED ADNAN

&


M. AYUB
ADVOCATES

OFFICE:

Flat No. (TF) 291-292 3rd floor
Deans trade centre Peshawar cantt:
Mobile No. 0334-5277323