


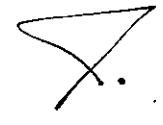
19.05.2023

Junior of learned counsel for the appellant present.
Mr. Amanullah, Assistant alongwith Mr. Asad Ali Khan, Assistant
Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for
adjournment on the ground that learned counsel for the appellant is
busy in the august Peshawar High Court, Peshawar. Adjourned. To
come up for arguments on 19.06.2023 before the D.B. Parcha
Peshi given to the parties.

RECORDED
IN
PESHAWAR


(Muhammad Akbar Khan)
Member (E)


(Salah-ud-Din)
Member (J)


Naeem Amin

09.02.2023

Appellant present in person. Mr. Umair Azam, learned Additional Advocate General for respondents present.

Mrs. Rozina Rehman, Learned Member (Judicial) is on leave today, therefore, case is adjourned to 20.04.2023 for arguments before D.B.

SCANNED
K. S. T.
Peshawar


(Fareeha Paul)
Member (E)

20.04.2023

Counsel for the appellant present. Mr. Fazal Shah Mohmand, Addl. A.G for the respondents present.

The Worthy Chairman is on leave today, the bench is, therefore incomplete. To come up for arguments on 19.05.2023 before the D.B. Parcha Peshi given to the parties.


(FAREEHA PAUL)
Member (E)

Fazle Subhan P.S


2nd Nov., 2022


Assistant to learned counsel for the appellant present.

Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate

General for the respondents present.

Request for adjournment was made due to engagement of learned senior counsel for the appellant before the Hon'ble Peshawar High Court today. Last opportunity is granted. To come up for arguments on 12.12.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

12.12.2022

Appellant present in person.

Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Former requested for adjournment due to engagement of his learned counsel in the Honourable Peshawar High Court. Appellant is directed to ensure attendance of his learned counsel on the next date for arguments. To come up for arguments on 09.02.2023 before the D.B.


(FAREEHA PAUL)
Member(E)


(ROZINA REHMAN)
Member (J)

SCANNED
ST
Peshawar

16-2-22

Due to Retirement of the Hon'ble Chairman
The case is adjourned to come up for
the same as before on 7-6-22

Yusuf
Reader

07.06.2022

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 10.08.2022 before the D.B.

Fareeha Paul
(Fareeha Paul)
Member (E)

Salah-ud-Din
(Salah-ud-Din)
Member (J)

8-8-2022

Proper DB not available today the case is
adjourned to 2-11-2022

Yusuf
Reader

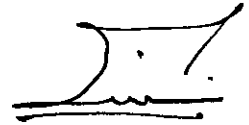
30.07.2021

Mian Muhammad Imran, Advocate, for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not gone through the record. Adjourned. To come up for arguments before the D.B on 30.09.2021.



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

30-9-21

*Due to non availability of the
DB the case is adjourned
to 5-1-2022*




Reader

05.01.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Former made a request for adjournment as he has not prepared the brief. Adjourned. To come up for arguments before the D.B on 16.02.2022.



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

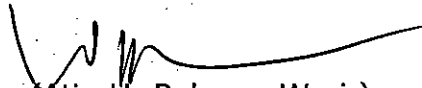


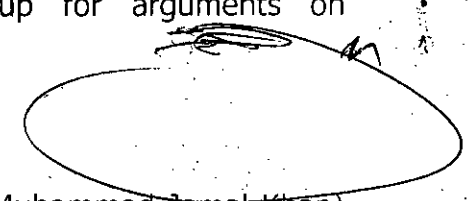
Chairman

01.02.2021

Appellant in person present. Mr. Kabirullah Khattak learned
Additional Advocate General for respondents present.

Appellant requested for adjournment that his counsel is not
available today. Adjourned. To come up for arguments on
13.04.2021ore D.B.


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


(Muhammad Jamal Khan)
Member (J)

13.04.2021

Due to demise of the Worthy Chairman the Tribunal is
defunct, therefore, case is adjourned to 30.07.2021 for the
same as before.

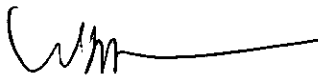

READER


16.09.2020

Junior counsel for appellant on behalf of appellant present.

Mr. Kabirullah Khattak learned Additional Advocate General alongwith Shah Nawaz ADEO for respondents present.

As per record an application in respect of amending the titled appeal by impugning the rejection of departmental appeal had been filed on 21.07.2020, copy whereof was served upon representative of respondents today in court. In the meanwhile, adjournment was also sought by junior counsel for appellant as senior counsel is indisposed; granted. To come up for reply and arguments on 18.11.2020 before D.B


(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)


18.11.2020

Appellant in person present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Shah Nawaz ADO (Litigation) for respondents present.

Representative of respondents submitted reply to application for amending the instant appeal. Copy of the same is handed over to appellant. Adjournment requested. Adjourned. To come up for arguments on 01.02.2021 before D.B.

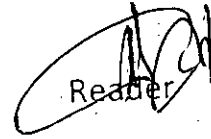

(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

5.5 .2020

Due to COVID19, the case is adjourned to

16/7/2020 for the same as before.


Reader

16.07.2020

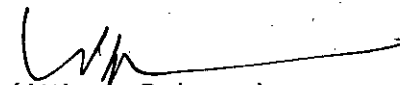
Due to COVID-19, the case is adjourned to 21.07.2020
for the same.


Reader

21.07.2020

Nemo for the appellant. Addl. AG for the respondents
present.

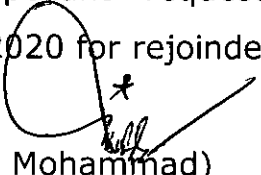
On the last date of hearing instant matter was adjourned
through Reader note, therefore, the appellant/counsel shall be
issued notices for 16.09.2020 for arguments before the D.B.



(Attiq-ur-Rehman)
Member


Chairman

05.03.2020

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 05.05.2020 for rejoinder and arguments before D.B.


(Mian Mohammad)
Member


(M. Amin Khan Kundi)
Member

Service Appeal No. 1376/2018

03.09.2019

Junior counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith M/S Wali Rehman, ADO on behalf of respondents No. 1 & 2 and Junaid, Senior Auditor on behalf of respondent No. 3 present.


Para-wise comments/reply, on behalf of respondents No. 1 & 2 already submitted. Respondent No. 3 has not submitted written reply/comments despite last opportunity. The appeal is posted for arguments before D.B to 18.11.2019. The appellant may submit rejoinder to the para-wise comments of respondents No. 1 & 2 within a fortnight, if so advised.


CHAIRMAN

18.11.2019

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Wali-ur-Rehman, ADO for the respondents present. Learned counsel for the appellant seeks adjournment to file rejoinder. Adjourned to 16.01.2020 for rejoinder and arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

16.01.2020

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak, Additional AG for the respondents present. Adjourned to 05.03.2020 for rejoinder and arguments before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

16.04.2019

Appellant with counsel present. Written reply on behalf of respondent No.3 is still awaited. No one present on behalf of respondent No.3. Notice be issued to the said respondent with direction to furnish written reply/comments. Last opportunity is granted. To come up for written reply/comments on behalf of respondent No.3 on 30.05.2019 before S.B.


Member

30.05.2019

Counsel for the appellant and Addl. AG alongwith Asif Shahzad, ADO for the respondents present.

Learned AAG requests for time to obtain comments/reply from respondent No. 3. Adjourned to 05.07.2019 as a last chance for the purpose.


Chairman

05.07.2019

Appellant in person and Mr. Ziaullah, DDA alongwith Mr. Lutfullah, Assistant Litigation for respondents present. Written reply/comments on behalf of respondent no.3 not submitted. Notices be issued to the respondent no.3 for submission of written reply/comments by way of last chance. Case to come up for written reply/comment of respondent no.3 on 03.09.2019 before S.B.


(Ahmad Hassan)
Member

28.01.2019

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Wali-ur-Rehman, ADO for respondent No. 1 & 2 present and submitted written reply. Representative of respondent No. 3 is not present therefore, notice be issued to respondent No. 3 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on behalf of respondent No. 3 on 12.03.2019 before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

12.03.2019

Appellant with counsel present. Written reply on behalf of respondent No.3 is still awaited. Notice be issued to respondent No.3 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 16.04.2019 before S.B

~~16.04.2019~~

~~Appellant with counsel present. Written reply on behalf of respondent No.3 is still awaited. No one present on behalf of respondent No.3. Notice be issued to the said respondent with direction to furnish written reply/comments. Last opportunity is granted. To come up for written reply/comments on behalf of respondent No.3 on 30.05.2019 before S.B.~~

~~Member~~

30.11.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. The appellant was appointed as PST (BPS-7) on 17.06.2008. That while serving as PST (BPS-12) at GPS Toba Pashto Allai, District Battagram, his salary was stopped by the respondents in March 2015 without any justification. That he submitted a number of applications for release of his salary but they failed to evoke any positive response from the respondents. As a last resort he filed departmental representation on 05.04.2018, which was rejected on 08.10.2018 without any speaking order. As issue of payment of salary is involved so limitation will not affect the cause of action. Grievances of the appellant are quit genuine and need to be redressed.

Appellant Deposited
Security & Process Fee

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 21.01.2019 before S.B.

(AHMAD HASSAN)
MEMBER



21.01.2019 Appellant in person present. Wali ur Rehman ADEO representative of the respondents present. Written reply not received. Representative of the respondents seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 28.01.2019 before S.B

Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1376/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/11/2018	The appeal of Mr. Sarfaraz Khan presented today by Mian Muhammad Imran Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.  REGISTRAR 7/11/18
2-	17-11-2018	This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>30-11-2018</u> .  CHAIRMAN

SCANNED
ST
Peshawar

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

Service Appeal No. 1376 /2018

Sarfraz Khan (PST) (BPS-12) S/O Umar Fad R/O Kas Qalandar, Allai, Battagram
.....Appellant

VS

Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and
others

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Through

Appellant

(Mian Muhammad Imran)
Advocate High Court

(1)

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

Service Appeal No. _____/2018

Sarfaraz Khan (PST) (BPS-12) S/O Umar Fad R/O Kas Qalandar, Allai, Battagram
.....Appellant

VS

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
 2. District Education Officer (Male), Battagram
 3. District Account Officer, Battagram
-Respondents

SERVICE APPEAL U/S 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE UNLAWFUL STOPPAGE OF MONTHLY SALARIES OF THE APPELLANT SINCE MARCH 2015 WITHOUT ANY COGENT JUSTIFICATION KEEPING IN VIEW THE FACT THAT THE APPELLANT HAS ALWAYS PERFORMED HIS DUTY WITH DEDICATION AND DILIGENCE SINCE INCEPTION OF HIS SERVICE (17/06/2008) AND FOR ISSUANCE OF DIRECTIONS TO ADJUST THE APPELLANT ON HIS DUTY PLACE AND SEAT AS THE APPELLANT HAS NEITHER BEEN TEMINATED NOR DISMISSED FROM SERVICE HITHERTO.

The appellant is pleased to beseech before this Honorable Court as under;

1. That the appellant was appointed as PST (BPS-07) on 17/06/2008 on the recommendation of the Departmental Selection Committee and approval of the competent authority and was directed to perform his duties at "GPS Bandi Chari Said, Battagram". **(Copy of Appointment Order is attached as F/A)**
2. That the appellant has always performed his duties with efficiency and diligence and never ever caused hardships for his high-ups. **(Copy of Service Book and Pay Slips is attached as F/B)**
3. That the stroke of misfortune hit the appellant in the month of March 2015 when he was serving as "PST (BPS-12)" at "GPS Toba Pashto Allai, District Battagram, his salary was stopped unceremoniously without specifying any justification. In this regard, the appellant immediately informed the concern quarters but no heed was paid. **(Copy of Request Application is attached as F/C)**

(2)

4. That with the passage of time, the appellant submitted a number of applications but his salary was not released which further increased the miseries and agonies of the appellant. **(Copy of the Applications are attached as F/D)**
5. That it is axiomatic to submit that despite repeated application to the different quarters, the appellant at last submitted his departmental appeal to the Respondent No. 01 (Director, E&S Education K-P Peshawar) on 05/04/2018. **(Copy of the Departmental Appeal is attached as F/E)**
6. That despite the submission of the aforesaid departmental appeal, the appellant didn't get any reply or response from the Respondents so another reminder was sent on 27th June 2018 where the appellant was telephonically informed that such appeal was forwarded to Respondent No. 02 and was also informed that as soon as they get the reply there will be a response. **(Copy of the Reminder is attached as F/F)**
7. That the appellant after great struggle, acquired a copy of the rejection letter of the departmental appeal on 08/10/2018 where Respondent No. 01 conveyed the message to Respondent No. 02 regarding rejection of the departmental appeal vide letter no. 3336/F.No.162/Vol:15/Appeal of PST (M) General Dated Peshawar the 8/10/2018. **(Copy of the Rejection is attached as F/G)**
8. That feeling aggrieved from the un-lawful stoppage of the salaries of the appellant and rejection of the departmental appeal, the petitioner being a civil servant approaches this Honorable Tribunal on the following grounds inter-alia;

GROUND:

- A. That the act of the Respondents to stop the salary of the appellant is against the mandate of law, rules and natural justice.
- B. That it is pertinent to submit that the appellant is still of the strength of the education department as so far, the appellant has neither been dismissed from service nor terminated but the salary has been blocked without any justification and explanation which is sheer violation of the fundamental right of the appellant.
- C. That it is also submitted that no disciplinary action so far, has been initiated against the appellant by the Respondents in shape of any explanation, enquiry or show-cause but without specifying any reason stopped the salary of the appellant which has further increased the problems of the appellant.

3

- D. That the universal adage "Audi Alterem partem" provides that no one can be condemned unheard" which means if any action is to be taken against any person, at least a fair opportunity is required to be provided to such person but in the instant case, no opportunity has been provided and the salary has been stopped.
- E. That it is also essential to submit that the stoppage of salary provides and causes recurring cause of action so, the appellant right's has been violated very badly.
- F. That there are plethora of judgments of the Honorable Courts that salaries cannot be stopped without any reason and cause and if it is done, such would be unlawful and against the mandate of law. Thus, by stopping the salary of the appellant without any reason and justification is against the mandate of law, rules and natural justice.
- G. That any other ground can be raised at the time of arguments.

PRAYER:

In light of the foregoing submissions, it is therefore, most convivially and humbly prayed that on acceptance of the instant appeal, this Honorable Tribunal may graciously be pleased to;

1. **Declare** the stoppage of monthly salaries of the appellant since March 2015 as unlawful, without lawful authority, against the fundamental rights of the appellant and void ab-initio
2. **Direct** the Respondents to release/start the monthly salaries of the appellant
3. **Direct** the Respondents to release all the unpaid accrued salaries since March 2015 to the appellant
4. **Direct** the Respondents to adjust the appellant on his post of PST in District Battagram
5. **Direct** the Respondents, in case any pending charges, to afford an opportunity of hearing

4

6. Any other relief which this Honorable Tribunal may deem fit and proper may also be awarded in favor of the appellant

Through

Appellant

(Mian Muhammad Imran)

Advocate High Court

(Muhammad Uzairullah Jan)

Advocate High Court

Office No. 05 Shan Plaza, Sikandar Pura
Chowk, Hashtnagri Peshawar
0333-9577770 0333-9274073

5

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

Service Appeal No. _____/2018

Sarfaraz Khan (PST) (BPS-12) S/O Umar Fad R/O Kas Qalandar, Allai, Battagram
.....Appellant

VS

Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar et.
al.

APPLICATION FOR CONDONATION OF DELAY IF ANY

1. That the accompanied service appeal is being submitted for the release of the stopped monthly salaries of the appellant.
2. That this application may be considered as part and parcel of the main accompanied service appeal.
3. That as the departmental appeal was filed on 05/04/2018 but despite the passage of three months appeal was not submitted before this Honorable Tribunal because the appellant was time and again informed by the respondents that the departmental appeal would be decided soon and in this regard an application was also written on 27th June 2018 and resultantly, the departmental appeal was rejected and the appellant got such rejection on 08/10/2018 and hence filed this service appeal within time.
4. That the applicant is a poor man having profound reliance on his job and salary so graciously seeks indulgence of this Honorable Court.

It is therefore, prayed that on acceptance of this application the delay, if any, may kindly be condoned please.

Applicant

Through


(Mian Muhammad Imran)
Advocate High Court

(6)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDRY EDU: BATTAGRAM.

APPOINTMENT:

Consequence upon the recommendation of the Departmental Selection Committee and Approval of the competent authority the appointment of Mr. Sarfaraz Khan S/O Umar Faad r/o Kas Qalander hereby Ordered in BPS No 07 (5890-320-15400) under Desable Quota at GPS Bandi Chari Said plus usual allowance as admissible Under the rules in the interest of public service with immediate effect the date of their taking over charge.

The terms and conditions given below.

TERMS AND CONDITIONS.

1. Charge report should be submitted to all concerned.
2. The fresh appointee will get initial allowances as admissible to them under the rules. they will be entitled for annual increment as per relevant Govt policy however they will not be eligible for pension and gratuity as per current policy of the Govt of NWFP.
3. The fresh appointee will produce age and heath certificate from the DHQ Hospital Battagram.
4. Their service will be considered dealt as per rules and regulation of the Govt of NWFP.
5. Contribution of C.P Fund will be as per rules and regulation of Govt of NWFP.
6. The appointee are bound to take over charge in their respective school within 15 days of the issuance of This order.
7. The appointee whose documents proved bogus/fake they will be terminated from their service.
8. The appointee will be governed and dealt with current notified rules and policy of the Govt of NWFP Finance department.
9. The appointee will not apply for any transfer for the minimum of 2 years as any request/appeal in this Regard shell not be entertained.


EXECUTIVE DISTRICT OFFICER
ELE: & SEC: EDU; BATTAGRAM.

Endst: No 4021-24 EB/AE-ILF Apptt:

Dated 17 /06/2008

Copy to the:-

1. District Coordination Officer Battagram.
2. District Account Officer Battagram.
3. Dy: District officer (Male) Ele: Edu; Battagram,
4. candidate concerned.


DISTRICT OFFICER (MALE)
ELEMENTARY AND SECONDRY EDUCATION
BATTAGRAM.

7

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION BATTAGRAM

Adjustment After Expiry of leave.

Mr. Sarfaraz Khan PSt GPS Bandi Chari Said is returned from long leave and adjustment a GPS Toba Pashto Allai Against vacant post after expiry of leave w.e.f 01-03-2013 in the interest of public service.

Note:- Charge report should be submitted to all concerned.

1. Necessary entry to this effect may be in his service book accordingly.



EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
BATTAGRAM

Endstt: NO: _____ EB/AE-II/F-PST

Dated: ____/03/2013.

Copy forwarded to:-

- 1 Deputy District Officer (M) (E&SE) Battagram along with service book of above name teacher.
- 2 District account Officer Battagram.
- 3 Teacher concerned.
- 4 Office file


EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
BATTAGRAM

(8)

FORM NO. PCRDP-III
(Referred to in Rule-12 (2))
REPORT OF ASSESSMENT OF THE REGISTERED DISABLED
PERSON BY THE DISTRICT ASSESSING BOARD

1. Name of disabled person, SARFARAZ KHAN
2. Father's name, UMAR PAD
3. Identity Card No. 13201-1123103-3
4. Date of Birth 10-12-1978
5. Education Status _____

Photograph of disabled
seeking employment
against 2% quota must
attach

6. Previous training in Trades/Skills, if any _____
7. Address (Permanent) Village Dalamber Kosh Bana Allah
ii. Present _____

8. Registration No. and the name of employment exchange where registered.

9. Nature of disability claimed. Right Left Congenital Talipes equinovarus
Not Disabled/ disabled Yes / No

10. Findings of the Board.

i. Fit to work; if fit specify job. _____
ii. Prosthesis if any required for work. _____
iii. Protective equipment if any recommended to _____ avoid hazard.
iv. Medical treatment if any recommended. _____

[Signature]
SIGNATURE

[Signature]
1. Medical Superintendent, District
Headquarter Hospital/Commissioner
of the Board. 28/3/2010
2. Manger, Employment Exchange
(Member)
3. Rep. of Technical Training wing
of the Directorate of Manpower
and Training (Member)



DOMICILE CERTIFICATE

9

I am born of parents who are permanently domiciled in N. W. F. Province
born in this Province.

I was born at BANNA KAS QALANDER Tehsil ALLAI

District BATTAGRAM

I passed Primary Examination from GOVT: PRIMARY School KARG ALLAI

Resident of BANNA KAS QALANDER

Tehsil ALLAI

District BATTAGRAM

Sd/ سرفراز خان Dated 15.5.1995

Pursuance to the declaration dated _____

Filed by SARFARAZ KHAN S/o UMAR FAZ

Tribe SWATI Section AZAM KHAIL Sub Section AZAM KHAIL

BANNA KAS QALANDER Tehsil ALLAI District BATTAGRAM

to the effect that he had been born of parents who are permanently domiciled in

N. W. F. Province having been born within it.

Naib Tehsildar Allai

I have satisfied myself from ~~personal~~ my own knowledge the above declaration is

a and certify accordingly.

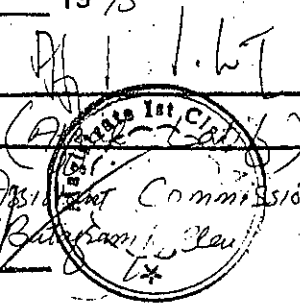
Given under my hand and the seal of Court this _____

17th day of May 1995

MAGISTRATE 1ST CLASS _____

Countersigned

DISTRICT MAGISTRATE 303 dated 1995 _____



District Magistrate
(Battagram)

Stationery Mart Kashmir Road Mansehra. No 785

(10)

(For use in Police Department only).

Heirs,

- 1.
- 2.
- 3.

[Signature]
 Deputy District Officer
 (Male) Primary Battagrami

① Passed the SSC Exam: from the BISE Abbottabad
 Under Roll No: 8989- Series: 1995. obtaining 499 marks
 Result declared on 20.7.1997

② Passed the PTC Exam: from the R.D.E - Peshawar
 Under Roll No: 1594- Series: 654: marks
 Result declared on 25.04.2000. received back

Verification Roll No.

[Signature]
 Deputy District Officer
 (Male) Primary Battagrami

Left Thumb Impression

Qualification	Date	Qualification	Date
English		First Arts	
Pushto		B.L. or B.A	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger Print		Other qualifications—	
Drill Instructing			
Court Duties			
Reserve Duties			

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

(11)

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

1. Name: SARFARAZ KHAN

2. Race: Swati

3. Residence: village Kas Balandar Banna Ailai Ballagram

4. Father's name and residence: UMAR RAZ of Kas Balandar Ailai

5. Date of birth by Christian era as nearly as can be ascertained: (10-12-1978) Tenth December N.H. of Seventy Eight.

6. Exact height by measurement: 5-6

7. Personal marks for identification: Nil

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: *Sarfraz Khan*

10. Signature and designation of the Head of the office, or other Attesting Officer. Deputy District Officer (Male) Primary Ballagram.

1	2	3	4	5	6	7	8
Name of Post	Substantive 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.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
PST		Grade: 3530-190-9230-BPS-7					
Gps: Bandichan/			3530/2			20 ⁶ / ₀₈	سرفراز خان
"			3530/2			1 ¹² / ₂₀₀₈	سرفراز خان
"			3720/2			1 ¹² / ₂₀₀₉	سرفراز خان
"			3910/2			1 ¹² / ₂₀₁₀	سرفراز خان
"		Grade: 5800-320-7508-BPS-7	6440/2			1 ⁷ / ₂₀₁₁	سرفراز خان
"			6760/2			1 ¹² / ₂₀₁₁	سرفراز خان
"		Grade: 7000-500-22000-BP-12	7000/2			1 ⁷ / ₂₀₁₂	سرفراز خان
Adjuste at Gps: Tub a Pasht 1-3-13			7000/2			1 ³ / ₁₃	سرفراز خان
			7500/2			1 ¹² / ₂₀₁₂	سرفراز خان
dt			8000/2			1 ¹² / ₂₀₁₃	سرفراز خان
dt			8500/2			1 ¹² / ₂₀₁₄	سرفراز خان

OFFICE
KILL
PAY FIXATION

PF 93
AT 93. 6440/2
MM.W.F.F.
1-12-2011

Authority Officer
Pay Fixation
W.F.F. Peshawar

9	10	11	12	13		14	15
				Leave			
				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		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or 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 any recorded punishment or censure, or reward or praise of the Government Servant
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram					Appointed as a PST teacher as Desable Quata at QPS Bandi Chari Said Battagram	<i>[Signature]</i>	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	30/11/90	A (Snet)	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram		vide EDO (E) SE: Battagram Endt: No: 4021-24- dated 17/6/2008	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	30/11/2010	9nd	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram		Services verified w.e.f. 20/6/2008 to 30/11/2009 from the acquittance rolls and other record kept in this office	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	30/6/2011	Review of Pay	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram			<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	30/11/2011	9nd	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram		Services Verified w.e.f. 20/6/2008 to 30/11/2009 from the acquittance rolls and other record kept in this office	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	30/6/2012	Allowd B01-12	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram			<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	30/11/2012	9nd	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram		Services Verified w.e.f. 1-12-2009 to 30-11-2010 from the acquittance rolls and other record kept in this office	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	30/11/2013	9nd	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram		Services Verified w.e.f. 1-12-2010 to 30-11-2011 from the acquittance rolls and other record kept in this office	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	30/11/2011	Along	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram			<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	
<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram					Services Verified w.e.f. 1-12-2011 to 30-11-2012 from the acquittance rolls and other record kept in this office	<i>[Signature]</i> Deputy District Officer (Male; Primary Battagram	

OFFICE OF THE

S.D.O. N.P. Bahraich

Date: _____

FOR THE MONTH OF

15 (200*5*)

Page No. *15*

DDO Code
(Cost Center)

173333

Description

BP-1

Personnel
Number

12099014

Employee
Name

Sarfraz Khan

National ID
Card No.

Grade (Pay
Scale Group)

121 PST

Salary
Status

Start

Stop

GENERAL DATA CHANGE¹³

CHANGE IN PAYMENTS/DEDUCTIONS¹⁷

Info Type	Field ID's	New Contents ¹⁶	Wage Type ¹⁸	Amount			Effective Date ³	Remarks ²²
				Rupees ¹⁹	Paise	Adi		
		<i>Var</i>		<i>172501</i>			<i>16/11/05</i>	<i>Appointed as a PST at G.P.S.</i>
		<i>HO</i>		<i>3218</i>				<i>Suba. Points granted v Post Sale</i>
		<i>CA</i>		<i>6502</i>				<i>2 plye vide No 7825-31</i>
		<i>MA</i>		<i>51965</i>				<i>15/11/05</i>
		<i>BA</i>		<i>2465</i>				
		<i>EA</i>		<i>4338</i>				
		<i>TA</i>		<i>2055</i>				
		<i>DA</i>		<i>3750</i>				
		<i>TA</i>		<i>11524</i>				

Prepared By

[Signature]
District Accounts Officer
Bahraich

Audited/Checked By

[Signature]
Sub-Divisional
Education Officer (Male)
Bahraich

Entered/Verified By



Employee Master File Creation Form

(Applicable for both Payroll and GP Fund)

Form: PAY01

Employee ID (To be assigned by office)

--	--	--	--	--	--	--	--	--	--

01 OFFICE OF THE S D BO Mall Pny

02 FOR THE MONTH OF SI 2003

03 DDO Code (Cost Center) 206039 Description DDC

PERSONNEL ACTIONS-INFO TYPE 00

05 Date of Entry (DD/MM/YYYY)

06 Current Govt. KPK

07 Employee group PST

08 Employee grade (Sub Group) PST

09 Employee NIC Number 71320111111111111111

11 Date of entry into Govt service (DD/MM/YYYY) 7/12/2013

10 DOB (DD/MM/YYYY) 7/12/1980

12 Reason for action

Handwritten note: 699014

PERSONNEL DATA - INFO TYPE 0002

13 Title Mr. Miss Ms Mrs

14 Last name SHARIQ

15 First name SHARIQ

16 Father/Husband name UMAR SHARIQ

17 District of domicile Balochistan

19 City of Birth Balochistan

21 Province of Domicile KPK

23 Nationality Pakistani

18 Marital status

20 Date of Marriage/Since (if applicable) DD/MM/YYYY

22 No. of dependents

24 Religion Isl am

ORGANISATIONAL ASSIGNMENT - INFO TYPE 0001

25 DDO Code (Cost Centre) 206039

27 District (Sub area) Balochistan

29 Position Gazetted Non Gazetted

30 Designation

33 Fund Section

34 Buck's no (if any)

26 DDO Code (Fund Centre) 206039

28 Contract Government

AJK Government Baluchistan Government
 Federal Government Khyber Pakhtunkhwa Government
 Punjab Government Sindh Government

31 Ministry (Organisational Unit)

33 Payroll Section

PRESENT ADDRESS INFO TYPE 0006

17

35 C/O _____

36 House no/Street: M. KRIVISIPa Bayan Viana
Alipor Nazagan

37 Postal Code: _____ 38 City: _____ 39 District: 121

40 Province / Region: KLP 41 Contract No. _____ 42 Company Housing: Yes No

PERMANENT ADDRESS - INFO TYPE 0006

Permanent address

Permanent address is same as above Permanent address is different from present address

43 C/O _____

44 House no/Street _____

45 Postal Code _____ 46 City _____ 47 District _____

48 Province _____ 49 Contract No. _____ 50 Company Housing: Yes No

BASIC PAY - INFO TYPE 0008

51 Pay Scale type: ATT 52 BPS Year (Pay Scale Area): 2011 53 Grade (Pay Scale Group): IIA 54 Pay Scale Level: _____

55 Pays

Wage Type	Description	Amount
<u>120</u>	<u>01</u>	<u>1200</u>

Wage Type	Description	Amount

LEAVES - INFO TYPE 2001

Code	Description	Balance

Code	Description	Balance

BANK DETAIL - INFO TYPE 0009

57 Bank Branch (Bank Key): _____ 58 Postal Code: _____ 59 City: 7900/069-03

60 Bank Account No. _____ 61 Payment method: 2 HBL Datta

18

GP FUND SUBSCRIPTION - INFO TYPE 0057

62 Wage Type 63 GPF Subscription

GP FUND - INFO TYPE 9202

64 Interest Applied Yes No 65 GPF balance

66 GPF Bal date (DD/MM/YYYY) 67 Old GP Fund Account Number

CREATE DATA SPECIFICATION - INFO TYPE

68 Date appointed as Gazetted Officer (DD/MM/YYYY) 69 Suspension Date

70 Expiry of Adhoc/Contract Date

INTERNAL DATA - INFO TYPE 0032

71 Previous Personnel Number (If any) 72 National Tax Number (NTN) 73 Leave without pay

74 Cash Conter: *24. Peshwa*

FAMILY INFORMATION - INFO TYPE 0031

S.No.	Relation	Last name	First Name	Nominee	Gender	DOB	City of birth	Nationality	%age of share	Emp Type	Other Nationality
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											

RECURRING PAYMENTS (ALLOWANCES) - INFO TYPE 0014

Wage Type	Description	Amount	Wage Type	Description	Amount
10	DA	130.0			
11	CA	272.0			
12	MA	100.0			
13	HA	100.0			
14	DA-16	650.0			
15	DA-11	850.0			
24	12	1500			

RECURRING PAYMENTS (DEDUCTIONS) - INFO TYPE 0014

Wage Type	Description	Amount	Wage Type	Description	Amount
	DA	1150			
	MA	80			
		13			
		173			
		11			

PAYROLL STATUS - INFO TYPE 003

78 SALARY STATUS Start Payment Stop Payment

[Signature]
 District Accounts Officer
 Battagram

[Signature]
 Sub Divisional
 Education Officer (Male)
 Prg: Battagram

19

00699014 SARFARAZ KHAN, CNIC: 1320111231633, Desig: (00000002) Grade: 14 NTN: Buckle No.: Gazetted/Non-Gazetted: N

0061 Basic Pay	9,220.00	3014 GPF Subscription - Rs	1,372.00-		
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-	GPF#:	30,369.00
1300 Medical Allowance	1,200.00	3511 Addl Group Insurance	13.00-		
1923 UAA-OTHER 20% (1-15)	1,000.00	3604 Group Insurance	115.00-		
1971 Adhoc Allowance 2011	738.00	3990 Emp. Edu. Fund, KPE	100.00-		
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow-1	1,844.00				
2148 15% Adhoc Relief All	1,383.00				
2174 Adhoc Relief Allow-2	922.00				

PAYMENTS: 20,243.00 DEDUCTIONS: 1,780.00 NET PAY: 18,463.00
 Branch Code: 220367 AJMERA, BATAGRAM. Habib Bank limited AJMERA, BATAGRAM. BATAGRAM 01.02.2015-28.02.2015
 Acct.No: 79001069-03

20

00699014 SARFARAZ KHAN CNIC: 1320111231633 Desig: (00000002) Grade: 14 NTN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	9,220.00	3014 GPF Subscription - Rs	1,372.00-		
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-	GPF#:	28,997.00
1300 Medical Allowance	1,200.00	3511 Addl Group Insurance	13.00-		
1923 UAA-OTHER 201 (1-15)	1,000.00	3604 Group Insurance	115.00-		
1971 Adhoc Allowance-2011	738.00	3990 Emp.Edu. Fund KPK	100.00-		
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow (1,844.00				
2148 15% Adhoc Relief All	1,383.00				
2174 Adhoc Relief Allow-2	922.00				
PAYMENTS	20,243.00	DEDUCTIONS	1,780.00-	NET PAY	18,463.00
Branch Code:220367	AJMERA, BATAGRAM.	Habib Bank Limited	AJMERA, BATAGRAM.	BATAGRAM	01.01.2015 31.01.2015 Acct.No: 79001069-03

00699014: SARFARAZ KHAN CNIC: 132011231633 Design: (00000002) Grade: 14 NIN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	9,220.00	3014 GPF Subscription - Rs	1,372.00-	GPF#:	27,625.00
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	160.00-		
1210 Convey Allowance 20	2,856.00	3511 Addl Group Insurance	13.00-		
1300 Medical Allowance	1,200.00	3604 Group Insurance	115.00-		
1923 UAA-OTHER 20%(1-15)	1,000.00	3990 Emp. Edu. Fund KPK	100.00-		
1971 Adhoc Allowance 2011	738.00				
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow (1,844.00				
2148 15% Adhoc Relief All	1,383.00				
2174 Adhoc Relief Allow-2	922.00				

PAYMENTS: 23,099.00 DEDUCTIONS: 1,780.00 NET PAY: 21,319.00 01.12.2014 31.12.2014
Branch Code: 220367 AJMERA, BATAGRAM Habib Bank Limited AJMERA, BATAGRAM Accnt.No: 79001069-03

21

00699014 SARFARAZ KHAN CNIC: 1320111231637 Desig: (00000002) Grade: 14-NIN Buckle No.: Gasetted/Non-Gasetted: N

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-
1000 House.Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-
1210 Convey Allowance 20	2,856.00	3511 Addl Group Insurance	13.00-
1300 Medical Allowance	1,200.00	3604 Group Insurance	115.00-
1923 UAA-OTHER 20(1-15)	1,000.00	3990 Emp.Edu. Fund KPK	100.00-
1971 Adhoc Allowance 2011	738.00		
1973 Adhoc Allowance 2011	2,460.00		
2118 Adhoc Relief Allow (1,722.00		
2148 154 Adhoc Relief All	1,291.00		
2174 Adhoc Relief Allow-2	861.00		

GPF#: 26,253.00

PAYMENTS: 22,214.00 DEDUCTIONS: 1,780.00 NET PAY: 20,434.00 01.11.2014 30.11.2014
 Branch Code: 220367 AJMERA, BATAGRAM Habib Bank limited AJMERA, BATAGRAM Accnt.No: 79001069-03

22

DDO: 00699014 SARTARAZ KHAN CNIC: 1320111231633 Desig: (00000002) Grade: 14 NTN: Buckle No.: Gazetted/Non-Gazetted: N.

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-
1210 Convey Allowance 20	2,856.00	3511 Addl Group Insurance	13.00-
1300 Medical Allowance	1,200.00	3604 Group Insurance	115.00-
1923 UAA-OTHER 20(1-15)	1,000.00	3990 Emp. Edu. Fund' KPK	100.00-
1971 Adhoc Allowance 2011	738.00		
1973 Adhoc Allowance 2011	2,460.00		
2118 Adhoc Relief Allow	1,722.00		
2148 15% Adhoc Relief All	1,291.00		
2174 Adhoc Relief Allow-2	861.00		

GPF#: 24,881.00

PAYMENTS: 22,214.00 DEDUCTIONS: 1,780.00
 Branch Code: 220367 AJMERA, BATAGRAM. Habib Bank limited AJMERA, BATAGRAM.

NET PAY: 20,434.00 01.10.2014 31.10.2014
 BATAGRAM Accnt. No: 79001069-03

23

DD Form 1320-11 (Rev. 12-13-13) Employee Name: SARFARAZ KHAN CNIC: 1320111231633 Desig: (00000002) Grade: 14 NTN: Buckle No: Gazetted/Non-Gazetted: N

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs.	1,372.00-	GPF#:	22,137.00
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-		
1210 Convey Allowance 20	2,856.00	3511 Addl Group Insurance	13.00-		
1300 Medical Allowance	1,200.00	3604 Group Insurance	115.00-		
1923 UAA-OTHER 20% (1-15)	1,000.00	3990 Exp. Edu. Fund KPK	100.00-		
1971 Adhoc Allowance 2011	738.00				
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow 1	1,722.00				
2148 15% Adhoc Relief All	1,291.00				
2174 Adhoc Relief Allow-2	861.00				

PAYMENTS: 22,214.00 DEDUCTIONS: 1,780.00 NET PAY: 20,434.00 01.08.2014 31.08.2014
 Branch Code: 220367 AJMERA, BATAGRAM Habib Bank Limited AJMERA, BATAGRAM Acct.No: 79001069-03

24

25

00699014 SARFARAZ KHAN CNIC: 1320111231633 Design: (00000002) Grade: 14 NITR Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-		
1000 House Rent Allowance	1,476.00	6211 CM KP Fund IDP,S-NW-2	278.00-	GPFK:	20,765.00
1210 Convey Allowance 20	2,856.00	3501 Benevolent Fund	180.00-		
1300 Medical Allowance	1,200.00	3511 Adtl Group Insurance	13.00-		
1923 UAA-OTHER 20(1-15)	1,000.00	3604 Group Insurance	115.00-		
1971 Adhoc Allowance 2011	738.00	3990 Emp.Edu. Fund KPK	100.00-		
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow (1,722.00				
2148 15+ Adhoc Relief All	1,291.00				
2174 Adhoc Relief Allow-2	861.00				

PAYMENTS: 22,214.00 DEDUCTIONS: 2,058.00 NET PAY: 20,156.00
 Branch Code: 220367 AJMERA, BATAGRAM Habib Bank Limited AJMERA, BATAGRAM
 01.07.2014 31.07.2014
 Acct.No: 79001069-03

26

00699014 SARFARAZ KHAN (00000002) GPF de 14/01/2014 Buckle No.: 10,369.00

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-
1230 Convey Allowance 20	2,720.00	3511 Addl Group Insurance	13.00-
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-
1923 UAA-OTHER 201(1-15)	1,000.00	3990 Emp. Edu. Fund:KPK	100.00-
1971 Adhoc Allowance 2011	738.00		
1973 Adhoc Allowance 2011	2,460.00		
2118 Adhoc Relief Allow (1,722.00		
2148 151 Adhoc Relief Ali	1,291.00		

GPF: 10,369.00

PAYMENTS: 21,017.00
 Branch Code: 220367 AJMERA, BATAGRAM

DEDUCTIONS: 1,780.00
 Babid Bank, limited AJMERA, BATAGRAM

NET PAY: 19,237.00
 BATAGRAM

19,237.00 01.06.2014 30.06.2014
Acct. No: 79001069-03

27

00699014: SARFARAZ KHAN CNIC: 1920111231633 Desig: (00000002) Grade: 14 NTN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-	GPF#:	30,369.00
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-		
1210 Convey Allowance 20	2,720.00	3511 Addl Group Insurance	13.00-		
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-		
1923 UAA-OTHER 20% (1-15)	1,000.00	3990 Emp. Edu. Fund KEK	180.00-		
1971 Adhoc Allowance 2011	738.00				
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow (1,722.00				
2148 15% Adhoc Relief All	1,291.00				

PAYMENTS: 21,017.00 DEDUCTIONS: 1,780.00 NET PAY: 19,237.00 01.05.2014 - 31.05.2014
Branch Code: 220367 AJMERA, BATAGRAM. Habib Bank Limited AJMERA, BATAGRAM. BATAGRAM Acct. No: 79001069-03

28

DDO: [Illegible]

006990147 SARFARAZ KHAN CNIC: 132011231633

Grade: 14 Buckle No. Gazetted/Non-Gazetted: N

0001 Basic Pay	8,610.00	3514 GPF Subscription - Rs	1,372.00-		
1050 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-	GPF#:	30,369.00
1210 Convey Allowance 20	2,720.00	3511 Addl Group Insurance	13.00-		
1300 Medical Allowance	1,000.00	3694 Group Insurance	115.00-		
1923 UAA-OTHER 20 (1-15)	1,000.00	3930 Emp.Edu. Fund-KPK	100.00-		
1971 Adhoc Allowance 2011	738.00				
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allg (1,722.00				
2148 15% Adhoc Relief All	1,291.00				

PAYMENTS: 21,017.00 DEDUCTIONS: 1,780.00 NET PAY: 19,237.00

Branch Code: 220367 AJMERA, BATAGRAM. Habib Bank Limited AJMERA, BATAGRAM. Acct. No: 79001069-03

01.04.2014 30.04.2014

29

00699014 SARFARAZ KHAN CNIC: 132011231633 Desig: (00000002) Grade: 14 NTN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-	GPF#:	30,369.00
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-		
1300 Medical Allowance	1,000.00	3511 Adtl Group Insurance	13.00-		
1923 UAA-OTHER 201(1-15)	1,000.00	3604 Group Insurance	115.00-		
1971 Adhoc Allowance 2011	738.00	3990 Emp.Edu. Fund KPK	100.00-		
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow (1,722.00				
2148 15% Adhoc Relief All	1,291.00				

PAYMENTS: 18,297.00 DEDUCTIONS: 1,780.00 NET PAY: 16,517.00 01.03.2014-31.03.2014
 Branch Code: 220367 AJMERA, BATAGRAM Habib Bank Limited AJMERA, BATAGRAM BATAGRAM Acct. No: 79001069-03

00699014 SARFARAZ KHAN CNIC: 132011231631 Desig: (00000002) Grade: 14 NTN: Buckle No: Geatted/Non-Geatted: N

GPFN: 30,369.00

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-
1300 Medical Allowance	1,000.00	3511 Addl Group Insurance	13.00-
1323 UAA-OTHER 20% (1-15)	1,000.00	3604 Group Insurance	115.00-
1371 Adhoc Allowance 2011	738.00	3990 Emp.Edu. Fund KPK	100.00-
1973 Adhoc Allowance 2011	2,460.00		
2118 Adhoc Relief Allow	1,722.00		
2148 15% Adhoc Relief All	1,291.00		

PAYMENTS 18,297.00
Branch Code: 220367 AJMERA BATAGRAM

DEDUCTIONS 1,780.00
Habib Bank Limited AJMERA BATAGRAM

NET PAY 16,517.00 01.02.2014 28.02.2014
Accont No: 79001069-03

31

00699014 SARFARAZ KHAN CNIC: 1320111231633 Daily (00000002) Grade: 14 NTN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-	GPF#:	28,997.00
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-		
1300 Medical Allowance	1,000.00	3511 Addl Group Insurance	13.00-		
1923 UAA-OTHER 20%(1-15)	1,000.00	3604 Group Insurance	115.00-		
1971 Adhoc Allowance 2011	738.00	3990 Emp.Edu. Fund KPK	100.00-		
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow (1,722.00				
2148 15% Adhoc Relief All	1,291.00				

PAYMENTS: 18,297.00 DEDUCTIONS: 1,780.00- NET PAY: 16,517.00 01.01.2014-31.01.2014
Branch Code: 220367 AJMERA, BATAGRAM. Habib Bank Limited AJMERA, BATAGRAM. BATAGRAM Accnt.No: 79001069-03

(32)

00699014 SARFARAZ KHAN CNIC: 1320111231633 Desig: (00000002) Grade: 14 NTN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	8,610.00	3014 GPF Subscription - Rs	1,372.00-	GPF#:	27,625.00
1000 House Rent Allowance	1,476.00	3501 Benevolent Fund	180.00-		
1210 Convey Allowance 20	2,720.00	3511 Addl Group Insurance	13.00-		
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-		
1923 UAA-OTHER 20% (1-15)	1,000.00	3990 Emp. Edu. Fund KPK	100.00-		
1971 Adhoc Allowance 2011	738.00				
1973 Adhoc Allowance 2011	2,460.00				
2118 Adhoc Relief Allow	1,722.00				
2148 15% Adhoc Relief All	1,291.00				

PAYMENTS 21,017.00 DEDUCTIONS 1,780.00 NET PAY 19,237.00 01.12.2013 31.12.2013
Branch Code: 220367 AJMERA, BATAGRAM. Habib Bank limited AJMERA, BATAGRAM. BATAGRAM
Acct. No: 79001069-03

33

DDO: ... Date of Birth: ... Designation: ... (00000002) Grade: 14 P.T. Buckle No.: ... Gazetted/Non-Gazetted: N

0001 Basic Pay	8,000.00	3511 Adnl Group Insurance	13.00-
1000 House Rent Allowance	1,476.00	3604 Group Insurance	115.00-
1210 Convey Allowance 20	2,720.00	3990 Emp.Edu. Fund KPK	100.00-
1300 Medical Allowance	1,000.00		
1923 UAA-OTHER 20% (1-15)	1,000.00		
1971 Adhoc Allowance 2011	738.00		
1973 Adhoc Allowance 2011	2,460.00		
2118 Adhoc Relief Allow (1,600.00		
2148 15% Adhoc Relief All	1,200.00		
5002 Adjustment House Ren	1,360.00	3014 GPF Subscription - Rs	1,372.00-
5801 Adj Basic Pay	8,000.00	3501 Benevolent Fund	180.00-

GPF#: 26,253.00

PAYMENTS 29,554.00
 Branch Code: 220367, AJMERA, BATAGRAM.

DEDUCTIONS 1,780.00
 Babib Bank limited, AJMERA, BATAGRAM.

NET PAY
 BATAGRAM

27,774.00 01.11.2013 to 30.11.2013
 Acct.No: 79001069-03

34

DDO: SARFARAZ KHAN Deputy District Officer (00000002) Grade: 12: NIN: Buckle No.: Gazetted/Non-Gazetted: N
 00699014: SARFARAZ KHAN CNIC: 132011231633 Desig: (00000002) Grade: 12: NIN: Buckle No.: Gazetted/Non-Gazetted: N
 00000002: SARFARAZ KHAN Deputy District Officer (00000002) Grade: 12: NIN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	7,000.00	3012 GPF Subscription - Rs	1,160.00-
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-
1210 Convey Allowance 20	2,720.00	3511 Addl Group Insurance	13.00-
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-
1923 UAA-OTHER 20% (1-15)	1,000.00	3990 Emp. Edu. Fund KPK	100.00-
1971 Adhoc Allowance 2011	653.00		
1973 Adhoc Allowance 2011	2,177.00		
2118 Adhoc Relief Allow (1,400.00		
2148 15% Adhoc Relief All	1,050.00		

GPF: 24,881.00

PAYMENTS: 18,306.00
 Branch Code: 220367 AJMERA, BATAGRAM.

DEDUCTIONS: 1,568.00
 Habib Bank limited AJMERA, BATAGRAM.

NET PAY: 16,738.00 01.10.2013 31.10.2013
 BATAGRAM
 Acct. No: 79001069-03

35

00699014 SARIKAR KHAN CNIC: 1320111231633 Desig: (00000002) Grade: 12 NTN: Buckle No.: Gazetted/Non-Gazetted: N

00699014 SARIKAR KHAN CNIC: 1320111231633 Desig: (00000002) Grade: 12 NTN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	7,000.00	3012 GPF Subscription - Rs	1,160.00-
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-
1210 Convey Allowance 20	2,720.00	3511 Addl Group Insurance	13.00-
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-
1923 UAA-OTHER 204(1-15)	1,000.00	3990 Emp. Edu. Fund KPK	100.00-
1971 Adhoc Allowance 2011	653.00		
1973 Adhoc Allowance 2011	2,177.00		
2118 Adhoc Relief Allow (1,400.00		
2148 15% Adhoc Relief All	1,050.00		
PAYMENTS	18,306.00	DEDUCTIONS	1,568.00-

Branch Code: 220367 AJMERA, BATAGRAM. Habib Bank Limited AJMERA, BATAGRAM. NET PAY BATAGRAM

16,738.00 01.09.2013 30.09.2013 Acct.No: 79001069-03

23,509.00

36

00699014 SARFARAZ KHAN CNIC: 1320111231633 Desig: (00000002) Grade: 12 NTN: Buckle No.: Categorized/Non-Categorized: N

0001 Basic Pay	7,000.00	3012 GPF Subscription - Rs	1,160.00-		
1600 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-	GPF	22,137.00
1210 Convey Allowance 20	2,720.00	3511 Addl Group Insurance	13.00-		
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-		
1923 UAA-OTHER 20(1-15)	1,000.00	3990 Emp. Edu. Fund KPK	100.00-		
1971 Adhoc Allowance 2011	653.00				
1373 Adhoc Allowance 2011	2,177.00				
2118 Adhoc Relief Allow (1,400.00				
2148 15% Adhoc Relief All	1,050.00				

PAYMENTS: 18,306.00 DEDUCTIONS: 1,568.00 NET PAY: 16,738.00
 Branch Code: 220367 AJMERA, BATAGRAM. Habib Bank Limited. AJMERA, BATAGRAM. BATAGRAM
 01-08-2013 31-08-2013
 Acct. No.: 79001669-03

PAYROLL REGISTER
 DD FORM 135 (REV. 10-6-75)
 00699014 SARFARAZ KHAN CNIC: 1320111231633 Desig: (00000002) Grade: 12 NET: Buckle No.: Gazetted/Non-Gazetted: N
 20,765.00

0001 Basic Pay	7,000.00	3012 GPF Subscription - Rs	1,160.00-
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-
1210 Convey Allowance 20	2,720.00	3511, Addl Group Insurance	13.00-
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-
1923 UAA-OTHER 204(1-15)	1,000.00	3990 Emp. Edu. Fund KPK	100.00-
1971 Adhoc Allowance 2011	653.00		
1973 Adhoc Allowance 2011	2,177.00		
2118 Adhoc Relief Allow	1,400.00		
2148 154 Adhoc Relief All	1,050.00		

GPFN: 20,765.00

37

PAYMENTS 18,306.00
 Branch Code: 220367 AJMERA, BATAGRAM.

DEDUCTIONS 1,568.00-
 Habib Bank Limited AJMERA, BATAGRAM

NET PAY
BATAGRAM

16,738.00 01.07.2013 31.07.2013
 Acct. No: 79001069-03

52

00699014 SARFARAZ KHAN CNIC: 1320111231633 Design: (00000002) Grade: 12 NTN: Buckle No.: Gazetted/Non-Gazetted: N

0001 Basic Pay	7,000.00	3501 Benevolent Fund	180.00-
1000 House Rent Allowance	1,306.00	351F Addl Group Insurance	13.00-
1210 Convey Allowance 20	2,720.00	3604 Group Insurance	115.00-
1300 Medical Allowance	1,000.00	3990 Emp. Edu. Fund' KPK	100.00-
1323 UAA-OTHER 20(1-15)	1,000.00		
1971 Adhoc Allowance 2011	653.00		
1973 Adhoc Allowance 2011	2,177.00		
2118 Adhoc Relief Allow (1,400.00		
5011 Adj Conveyance Allow	5,440.00	3012 GPF Subscription - Rs	1,160.00-

PAYMENTS: 22,696.00
 Branch Code: 220367 AJMERA, BATAGRAM.

DEDUCTIONS: 1,568.00
 Habib Bank limited AJMERA, BATAGRAM.

GPF#: 30,369.00

NET PAY BATAGRAM 21,128.00 01.06.2013 30.06.2013
 Acct.No: 7900106-03

39

0001 Basic Pay 7,000.00
 1000 House Rent Allowance 1,306.00
 1210 Convey. Allowance 20 2,720.00
 1300 Medical Allowance 1,000.00
 1923 UAA-OTHER 20(1-15) 653.00
 1971 Adhoc Allowance 2011 2,177.00
 1973 Adhoc Allowance 2011 1,400.00
 2118 Adhoc Relief Allow. (3,218.00
 5002 Adjustment House Ren 6,702.00
 5011 Adj Conveyance Allow 2,464.00
 5012 Adjustment Medical A 17,250.00
 5801 Adj Basic Pay 2,464.00
 5887 Adj Unatract Area Al 4,339.00
 5898 Adj. Adhoc Allowance 2,045.00
 5911 Adj. Adhoc Relief 20 3,450.00
 5938 Adj. Adhoc Relief All

3012 GPF Subscription - Rs 1,160.00-
 3501 Benevolent Fund 180.00-
 3511 Addl Group Insurance 13.00-
 3604 Group Insurance 115.00-
 3390 Emp. Edu. Fund KPK 100.00-

GPFN: 30,369.00

PAYMENTS
 Branch Code: 220367

59,188.00
 AJMERA, BATAGRAM.

DEDUCTIONS
 Habib Bank limited

1,568.00-
 AJMERA, BATAGRAM.

NET PAY
 BATAGRAM

57,620.00 01.05.2013 31.05.2013
 Acct.No: 79001006-03

کنیت جناب ٹی ای او صعب (صلی) صلح بنگرام

(40)

جناب عالی ا

موردیانه گزارش ہے کہ من مسائل جو کہ سال 2008

سے آڈیٹ کی کاپی پر کام کر رہا ہے۔ اور گورنمنٹ ڈپارٹمنٹ

سکول ٹو نہ لیتو میں مسلسل ڈیوٹی سرانجام دے رہا ہے
نا معلوم وجوہات کی وجہ سے جمع اس سے یعنی

مارچ 2015 میں تنخواہ لیں ملی۔ جیسا کہ میں ایک فریڈ

انسان ہوں اور اسی تنخواہ سے میرا گھر چلتا ہے۔ اس لیے
مقررہ مقررہ مقررہ تنخواہ جاری فرمائی جائے۔

میں ایک بہت تاخیر اور دی ڈیوٹی

العد من

سر عزیز خان

آڈیٹ ڈیوٹی ٹو نہ لیتو بنگرام

مورخ 5/3/2015

درخواست - D.E.O. (مراد آباد) سے درخواست
41

درخواست گزار کے لئے - Page of Release

گزارش ہے کہ سائل کو وقت پر امری سکول میں پابندی

میں سب سے بہتر P.S.T. کو وقت پر ڈیوٹی سے فراہم کی جائے

اور تمام امور کو وقت پر ہی سائل کی خدمت میں

2015 سے سائل کی خدمت میں ہی سائل کی خدمت میں

سائل کی خدمت میں ہی سائل کی خدمت میں

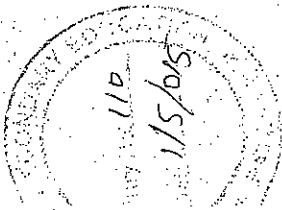
سائل کی خدمت میں ہی سائل کی خدمت میں

صدر قریب

محکمہ اعلیٰ

مراد آباد

سرکار P.S.T. P.S. کو پابندی



1-5-2015

حکومت چما - ڈسٹرکٹ ایجوکیشن افسیر چما - (میل) ضلع بنگلہ

(42) عنوان :- ریڈیز آف بے

صا - عالی

تعداد میں حصہ سائل گورنمنٹ پرائمری سکول ٹونہ پانچ
میں کتب PST ڈیوٹی سرانجام دے رہے ہیں
یہ کہ نامعلوم وجوہات کے ہم سے سائل کا تنخوا
مارچ 2015 سے بند ہو چکا ہے
یہ کہ سائل ایک عریباً لغزان سے تعلق رکھتا ہے
بڑا آجما - کہ عدت میں عرض حصہ سائل کا
تنخوا ریڈیز فرما کر پیش کیا اور فرمائش
میں لوازش ہوگی

العارضہ اسرافراز PST
ٹونہ پانچ G.P.S

Date 07-08-2015



ذہانت و حیا - ڈائریٹر برادری کی کوششوں کا سبب

43

حنا - حیا

گزارش ہے کہ من سائنس کی تنخواہ کسی ووم نے

جہاں عارضہ 2015 سے نا حال بند ہے - لکھی دروازوں

آج اور جو و میری تنخواہ کی ل میں کی گئی - اس

کے بارے میں مجھے یہ سب نہیں بتایا جاتا کہ کسی ووم نے

تنخواہ بند ہے

میں لکھنؤ آدھی ہوں اور اسی تنخواہ سے

اپنے بھائی اور بھائیوں کا سب سے بڑا ہوں - بھائی کے

علم حاصل کرنے کی کوششیں تنخواہ جاری رکھنا

میں اور سب کے عام خرچے کا اور ہوں -

آپ کا وائبر ڈائری

سرفراز

PSI PSI کے لیے لکھنؤ - شرم

جوائنٹ 15/11/11

حضرت جنا - ۷۴۵ ص ۱۱۱ صلوات اللہ علیہ

صنایع عالی

گزارش ہے کہ سن مسائل کی تنخواہ ماہ ماہ ۲۰۰۰ روپے
 سے بفرنیسی وجہ بزدلی میں کافی درخواستوں اور حلوں کے
 باوجود تنخواہ بحال کرنے میں تا کام رہا ہوں۔ اور نہ ہی مجھے
 بتایا جا رہا ہے کہ تنخواہ کی بندش کی وجہ کیا ہے۔ مہری بہت بکرا رہی
 اور ایسے سے درخواست ہے کہ مہری تنخواہ جاری کی جائے۔ کوئی
 ایسی صورت ہو کہ نظام عدالت میں استعمال ہوتی ہے۔

میں تمام عمر دیکھ رہی ہوں

آپ کا بھائی

سرفراز خان

آئی ڈی گورنمنٹ ہائر ایجوکیشن سکول ٹوبہ ٹیکسٹائل - بہاولپور

تاریخ ۱۱/۱۱/۱۵

To

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa

Subject: Appeal/Representation

Respected Sir,

With due respect, it is submitted that the appellant was appointed on 17/06/2008 as "PST" BPS-07 and was posted in "GPS Bandi Chari Said , Tehsil Allai & District Battagram. Since inception of his service, the petitioner worked hard and never caused any sort of problem for his high ups.

The stroke of misfortune hit the appellant when his salary was stopped in the month of March 2015 without any cogent justification. The appellant made a number of requests both written and verbally but his salary was not released. Feeling aggrieved from such unlawful stoppage of salary, the appellant filed W.P No. 819-A/2016 for the release of his salary but such was not entertained due to the lack of jurisdiction as salary comes in the ambit of terms and conditions of services. Despite performance of duties, the appellant has been kept in agony and hardships due to the stoppage of his salary since the month of March 2015 without any justification. It is also a fact that, salary cannot be stopped without termination, dismissal etc but the salary of the undersigned has been stopped. Apart from it, no inquiry in any shape has been conducted by the department and about 08 years of service has been thrown away. Furthermore, no written or speaking order of dismissal, termination etc has been issued by the department.

It is therefore, most humbly requested that the appellant may kindly be posted on the post of PST and his pending salaries since the month of March 2015 may kindly be issued to the appellant keeping in view the long 08 years of his service as well as his poor financial status and stature.

I shall be thankful to you for this act of kindness.

Yours Sincerely,

(Sarfaraz Khan)

PST, GPS Toba Pashto

Allai,

S/O Umar Faad

R/O Kas Qalandar

Allai, District Battagram

4/2018

(45)

Received 5/9

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**DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA**

No. 3330 /F.No.162/Vol:15/Appeal of
PST(M)General.
Dated Peshawar the 8/2 /2018.

To.

The District Education Officer (M)
Battagram.

Director (Estab)
Elementary & Secondary Edu
KPK Peshawar

Subject:- DEPARTMENTAL APPEAL.

Memo:-

I am directed to refer to your letter No.9766 dated 05.09.2018 on the subject cited above and to state that the appeal of the following teachers of District Battagram in light of DEO (M) Battagram report is hereby rejected.

1. Mr. Sarfaraz Khan PST GPS Toba Pashto Allai District Battagram.
2. Mr. Khial Muhammad PST GPS Lakhri Sar District Battagram.

I am further directed to ask you to inform the teacher concerned accordingly.

[Signature]
Deputy Director (Estab)
Elementary & Secondary Edu.
Khyber Pakhtunkhwa Peshawar.
5/1/18

Endst: No. _____

1. P.A to Director Elementary and Secondary Education local office.

Deputy Director (Estab)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

[Handwritten notes and signatures]
3462
13/10/18
DEO CM

BEFORE THE HONOURABLE KHYBER P

SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1376 of 2018

Sarfaraz Khan.....Appellant

VERSUS

Director Elementary and Secondary Education Khyber

Pakhtunkhwaand others Respondents

Index

S.No	Description /Documents	Annexure	Pages
1	Comments		1-6
2	Affidavit		07
3	Copy Dispatch Register	A	08
4	Copy of W.P No. 899-A/2016	B	9-10
5	Copy Report of SDEO	C	11-14
6	Copy Report of ASDEO	D	15-17
7	Copy of Report of Head Teacher	E	18-21
8	Copy of Letter addressed to Secretary E&SE KP Peshawar	F	22-25
9	Copy of Certificate of SDEO/ASDEOs and Office Staff	G	26
10	Appeal rejection letter	H	27

Respondent

BEFORE THE HONOURABLE KHYBER PA

SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1376 of 2018

Sarfaraz Khan.....Appellant

VERSUS

Director Elementary and Secondary Education Khyber
Pakhtunkhwa and othersRespondents

Para-wise Comments /Reply on behalf of
Respondents NO. 1 and 2

Respectfully Sheweth:

Preliminary Objections

1. That the appellant has no cause of action/locus standi to file the instant appeal.
2. That the appellant has concealed the material facts from this Honorable Tribunal.
3. That the appellant has not come to this Honorable Tribunal with clean hands.
4. That the appellant has filed the instant appeal on malafide grounds.
5. That the appellant's appeal is against the prevailing law and rules.
6. That the appellant is estopped by his own conduct to file the instant appeal.
7. That the claim of the appellant is unlawful; hence the instant appeal is liable to be dismissed.


21/1/18

Secretary
Education
Peshawar

①

8. THAT THE APPOINTMENT ORDER ATTACHED BY THE APPELLANT IS FAKE, FABRICATED AND PREPARED IN BOGUS MANNER, NOT ISSUED BY LAWFUL/COMPETENT AUTHORITY WHICH HAVING NO LEGAL SANCTITY BE CONSIDERED AS "NULL AND VOID". THE APPELLANT HAS NOT BEEN APPOINTED AS PST BY THE COMPETENT AUTHORITY AND HE NEVER REMAINED AS A CIVIL SERVANT IN THIS DEPARTMENT; HENCE THE INSTANT APPEAL IS LIABLE TO BE DISMISSED WITHOUT ANY FURTHER PROCEEDINGS.

FACTS

1. Para NO. 1 of the appeal is incorrect. The appellant was not appointed as Primary School Teacher (PST) by the competent authority. THE APPOINTMENT ORDER ANNEXED BY THE APPELLANT IS FAKE, BOGUS, FABRICATED AND NOT ISSUED BY THE LAWFUL AUTHORITY. Endstt; No. and date of issuing of order are not matching with office dispatch record. His claim regarding

recommendation of District

Office of
District
Education
Peshawar

3

selection

Committee and approval of the competent authority is incorrect/concoction. It is pertinent to mention here that a petition of appellant for release of pay is already pending before the Hon'able Peshawar High Court Abbottabad Bench as Writ Petition No. 819-A of 2016. Titled: Khyal Muhammad & another VS Govt of KPK & others.

(Copies of Dispatch Register and copy of writ petition are attached as *Annex: "A & B"*).

2. Para NO. 2 of the appeal is incorrect. The appellant neither remained on the strength of this department nor did he perform any duty. The appellant has failed to provide any proof regarding performance of duty. According to the record of school claimed by the appellant and reports of the concerned SDEO, ASDEO and Head Teacher, he has neither taken over charge nor performed any duty. Furthermore his case along with other fake/ghost employees was communicated to the Secretary E&SE KP Peshawar for initiating departmental enquiry. (Copies of reports of SDEO, ASDEO, Head Teacher of concerned school and letter addressed to Secretary E&SE KP Peshawar are annexed as *Annex: "C, D, E & F"*)

3. Para NO. 3 of the appeal is incorrect. The appellant's salary was rightly stopped. He received salaries earlier fraudulently and unlawfully as he

21/11/18
21/11/19

Chief Officer,
District Education Officer,
Peshawar.

As per

was not on the strength of this department statements of SDEO, ASDEOs and office staff neither his salary was activated by their offices nor was his service book/record maintained there. His claim regarding informing the high-ups is concoction. (Copy of certificate of SDEO/ASDEOs and office staff is attached as Annex; "G").

- 4. Para NO. 4 of the appeal is incorrect. The application attached by the appellant has no diary No. or any other sign of its submission in DEO Office which shows that the application is also bogus like his appointment order.
- 5. Para 5 of the appeal is correct to the extent that the appellant submitted an appeal to the respondent No. 1 which was rejected on the basis of bogus/fake appointment order. ANNEX "H"
- 6. Para No. 6 of the appeal is incorrect hence denied.
- 7. Appeal of the appellant was rightly rejected as the appellant never remained as a civil servant on the strength of this department. Appointment order attached by him has no legal sanctity.
- 8. Para No. 8 of the appeal is incorrect. The appellant has not been aggrieved. The appellant being non civil servant has no cause of action.

219/1/18

REASONS:

Chief Officer,
Education
& Peshawar

5

- A. Ground A of the appeal is incorrect. Salary of a civil servant is attached to the work done. While the appellant is neither a civil servant nor he performed any duty.
- B. Ground B of the appeal is incorrect. The appellant never remained on the strength of this department. He is not a civil servant.
- C. Ground C of the appeal is incorrect. Disciplinary proceeding is initiated against a civil servant while the appellant is neither on the strength of this department nor ~~is he~~ ^{he is} a civil servant. However his name was included in the list of ghost employees communicated to Secretary E&SE KP and his case is also under enquiry in NAB along with other ghost employees.
- D. Ground D of the appeal is incorrect. The appellant was not a civil servant. Detail has been given in preceding Paras.
- E. Ground E of the appeal is incorrect. The appellant is neither a Govt. Employee nor did he perform any duty. He has no right to be paid salary. However he is legally bound to refund the amount received by him as salaries fraudulently/unlawfully.
- F. Ground F of the appeal is incorrect. Salary of the appellant was rightly and lawfully stopped as he was neither on the strength of this department nor remained a civil servant.

21/1/18

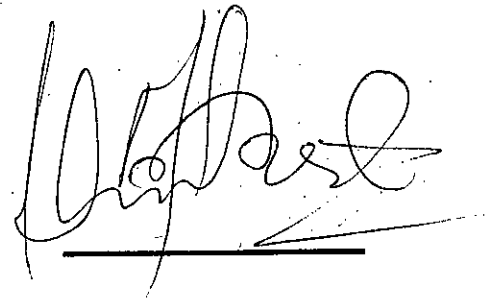
6

G. The appellant has no cause of action.

It is therefore humbly prayed that on acceptance of above Para-wise comments, the appeal of the appellant may graciously be dismissed with cost and direction to the appellant to refund the amount into Govt; treasury received by him as salaries unlawfully/fraudulently.

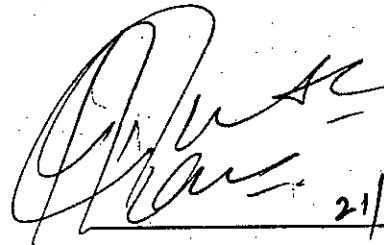
Respondent NO. 2

**District Education Officer (M)
Battagram**



Respondent NO. 1

**Director E&SE K.P
Peshawar**



21/01/2019

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

Service Appeal NO. 1376 of 2018

Sarfaraz Khan.....Appellant

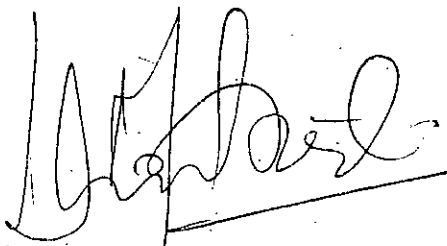
VERSUS

**Director Elementary and Secondary Education Khyber
Pakhtunkhwa and othersRespondents**

AFFIDAVIT

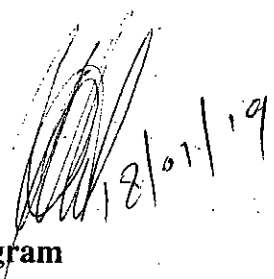
I Wali ur Rahman Assistant District Education officer (M) Battagram do hereby affirm and declare on oath that content of accompanying Para-wise comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Tribunal.

C/signed



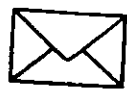
**District Education Officer (M)
Battagram**

**ADEO(Lit)
O/O DEO (M)Battagram**



5

Register of Letters Despatched



رجسٹر ڈاک روانگی

Serial NO. نمبر شمار	Month & Date مہینہ اور تاریخ	Name and Address نام اور پتہ	Place مقام	Subject مضمون	File NO. فائل نمبر	Stamps Received ٹکٹ آمد		Stamps Used ٹکٹ استعمال		Stamps Balanced بقایا ٹکٹ		Remarks کیفیت
						Rs.	Ps.	Rs.	Ps.	Rs.	Ps.	
4001		D. Co	Bath									
4005		D. Co	Bath									Dear Mr. Chairman State Life
4006-7												B. Fund
4008-9		DAO Battagram										Sanction of B. Fund
4010-11	25/08	Secretary B.S. Abbottabad										Notification Migration
4012-16		All Commercial										Staffed of July
4017-19		All Commercial										Staffed of July
4020												
4021-23		DAO (F) Bm										inter Distt. Trans
-	-	DAO Battagram										g/pos limit in the Habibpur Nisa Post office
-	-	Teacher concerned										
4024		EDO Finance Psm										Financial Sanction Petty Repair & CRC
4025-26		DAO - Psm										
		DC - Psm										
		Principal - H.M.S.										visit / Review Schedule

BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD

W.P No. 878 of 2016

(1) Khial Muhammad, Primary School Teacher (PST), Government Primary School Lagri Sar Naseem (2) Sarfraz Khan, Primary School Teacher (PST) Government Primary School Topa Pashto, Tehsil Allai District BattagramPetitioners

VERSUS

1. The Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
2. The Director, Elementary and Secondary Education, Peshawar.
3. The District Education Officer (Male), Battagram.
4. The District Accounts Officer, BattagramRespondents.

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 FOR A DECLARATION TO THE EFFECT THAT WITHHOLDING OF THE MONTHLY SALARIES OF THE PETITIONERS BY RESPONDENT NO.3 WITHOUT ANY REASON OR RHYME WITH EFFECT FROM MARCH 2015 UPTILL NOW IS UNCONSTITUTIONAL, ILLEGAL, WITHOUT LAWFUL AUTHORITY, WITHOUT JURISDICTION AND HAVING NO LEGAL EFFECT.

No: 3057
29.08.16

TODAY

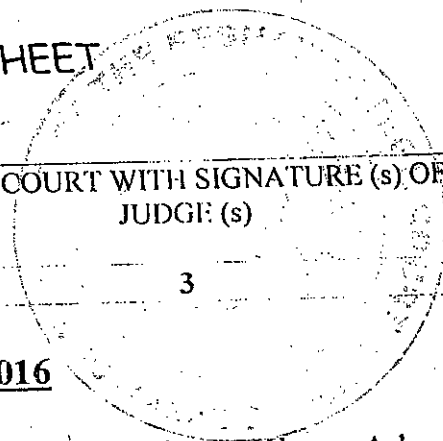
CA

Lawyer
Abbottabad Bench

22/08/16

Generated to be True Copy
Examined
Peshawar High Court
Abbottabad Bench
Authorized Under Section 75 Act
27/10/16

PESHAWAR HIGH COURT ABBOTTABAD BENCH.
FORM "A"
FORM OF ORDER SHEET



Serial No of order or proceeding	Date of Order or Proceeding	ORDER OF THE COURT WITH SIGNATURE (s) OF HON'BLE JUDGE (s)
1	2	3
	19.09.2016	<p>WP No.819-A/2016</p> <p>Present: Mr. Abdul Saboor Khan, Advocate, for the petitioners.</p> <p>****</p> <p>Comments of respondent No.3 be called for so as to reach this Court within a fortnight.</p> <p><i>Self Judge</i></p> <p><i>Self Judge</i></p>

Certified to be true Copy
 Examined
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Section 5 Acts Ordinance
27/10/16

Annexure - C

11
P-9

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER MALE ALLAI SUB DIVISION.

No. 2319 /Dated Allai the 10/10 /2016.

TO:-

The District Education Officer,
(Male) Battagram.

Subject:- **COMMENTS /RECORD IN W/P PO.819-A OF 2016 TITLED KHYAL MUHAMMAD AND ANOTHER VS GOVT:OF KP**

Memo:-

Reference to your office letter No. 10963-64/Lit dated 07.10.2016 detailed report as per required your letter mentioned above on the basis of reports of the Head Teacher of the concerned schools, ASDEO circle and superintendent SDEO(M) Office Allai is being submitted as under :-

1. The teacher attendance registers of both the schools were checked for June /2008 and onward. The undersigned found no attendance of both Mr. Khyal Muhammad at GPS Laghri Sar Naseem Allai and Mr. Sarfaraz Khan at GPS Toba Pashto Allai, however at GPS Toba Pashto the attendance record w.e.f January .2013 to June 2013 (6-Months) is not available /missing. The statement /certificate of the Head Teacher concerned regarding the missing pages is attached herewith (Annexure-3). The Head Teacher of GPS Toba Pashto during January /2013 to June 2013 has made it clear in his written statement that Mr. Sarfaraz Khan has not taken charge at this school during this period (January/2013 to June/2013)(Annexure-8). The Explanation of the concerned Head Teacher has been called by the undersigned.
2. Log Books of both the schools were checked thoroughly but the undersigned found no record or any kind of other entry /hints regarding Mr. Khyal Muhammad at GPS Laghri Sar Naseem and Mr. Sarfaraz Khan at GPS Toba Pashto. Copies of Log Books of both the schools are attached.
3. On checking the record of the concerned schools and also the concerned DDO no record was found regarding the charge reports of Mr. Khyal Muhammad and Mr. Sarfaraz Khan. (The written statements of the Head teachers of both the schools, ASDEO Circle and concerned Superintendent of the office of SDEO(M) Allai are attached herewith (Annexure-1,2,4,5,6&7).

4. The Service Books of Mr. Khyal Muhammad & Mr. Sarfaraz Khan were not found in the office of SDEO(M) Allai. The written statement of the Superintendent SDEO(M) Allai Office Mr. Neamatullah is attached herewith as (Annexure -7).
5. Transfer order of Mr. Sarfaraz Khan is not present/available neither at the SDEO(M) Allai Office nor at the concerned school.(GPS Toba Pashto).
6. No record /information regarding activation & stoppage of pay was found at this office as this office is functioning since 01.07.2014.
7. Their service books of Mr. Khyal Muhammad & Mr. Sarfaraz Khan were not found at our office.
8. According to the written statements of the Head Teachers of the concerned schools and ASDEO Circle concerned attached herewith Mr. Khyal Muhammad & Mr. Sarfaraz Khan have not performed their duties since the date mentioned in their appointments /transfers orders up to date.
9. As SDEO (M) Allai Primary office is working /functioning since 01.07.2014, and before 01.07.2014 matters of all kind were dealt by the SDEO(M) Primary office Battagram. Therefore, there is not available any kind of record regarding vacant /filled posts and appointment transfer for the period before 01.07.2014.(Annexure -7)

NW

Sub-Divisional Education Officer
(Male) Allai.

Amos e

(13)

(14)

OFFICE OF THE SUB DIVISION EDUCATION OFFICER (M)
BATTAGRAM

NO 877

Dated 10 / 10 / 2016

TO

The District Education Officer (M)
Battagram.

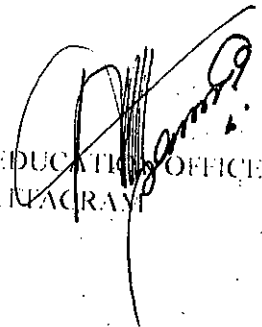
Subject:

Comments/Record in W/P. NO.819-A of 2016 Titled
Khyal Muhammad and another VS Govt. of KPK

Reference your office letter NO. 10963-64 dated 07/10/2016.

1. Enclosed please find herewith copies of Log Book and Teacher Attendance Register GPS Bandi Chari Said, statements of school staff duly signed by ASDEO circle, statement of Ex ASDEO circle Kuza Banda in respect of Sarfaraz Khan PST GPS Bandi Chari Said (Circle Kuza Banda), Statements of Dealing Assistants circle Kuza Banda.
2. As per school record and statements of school staff the person namely Sarfaraz Khan has neither attended the said school nor has taken over charge as PST in the said school.
3. As per statements of concerned Dealing Assistants ~~the~~ teacher of the names Khyal Muhammad S/O Nooran Shah and Sarfaraz Khan S/O Faad have neither submitted their arrival reports or charge reports to this office nor their cases have been submitted to District Accounts Office Battagram for activation of pay.
4. Their service books have not been processed/maintained by this office.

SUB-DIVISION EDUCATION OFFICER (M)
BATTAGRAM



Annex. C (14)

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (M) BATTAGRAM.

NO. 160

Dated 11 / 01 / 2019

To

The District Education Officer

(Male) Battagram.

Subject:

comments in service appeal NO-1376 & 1377/2018.

Memo:

Reference your letter dated 7/1/2019 on the subject mentioned above.

1-As per School record & statements of School staff the person namely Sarfaraz Khan has not attended the said School neither he has taken over his charge as PST in the School. No activation of pay was made by the DDO. Hence his appointment order/Service Book/Source I and II not found in the School and office.

2-And as per statement of concerned ASDEO, one Mr. Khyal Muhammad S/o Faad have neither submitted his arrival report of charge in this office nor his pay activation has been submitted to the District Accounts Office Battagram. The Service Book has not maintained and processed by the local office. And he is not the employee of Education Department.

of
lc
SUB-DIVISIONAL EDUCATION
OFFICER (MALE) BATTAGRAM
11/01/2019

تصدیق کی جاتی ہے کہ GPS ٹوبا پاشٹو (GPS Toba Pashto) کے ہیڈ ٹیچر کے رپورٹ اور میرے ریکارڈ کے مطابق اس اسکول

لکھی (GPS Toba Pashto) میں سرفراز نامی کوئی مدرس کبھی بھی نہیں رہا ہے اور نہ اب ہے۔ مذکورہ شخص نے اس

اسکول میں نہ چارہ لیا ہے اور نہ ہی اس اسکول میں ڈیوٹی سرانجام دی ہے۔ میں نے بذاتِ خود مذکورہ اسکول کا ریکارڈ

دیکھا ہے جس میں مذکورہ شخص کا کوئی تذکرہ یا اندراج نہیں ملتا۔

UZAIRULLAH KHAN
Assitt. Sub Div. Edu.
Office: M.I.A.

العبد
محمد نواز
Circle Atkai Payeen

شناختی کارڈ نمبر 7-3934309-13201

حواشی نمبر 03469606765

نوٹ: اس سرسید سٹیٹ اسکول کے سالانہ امتحان کے ریکارڈ میں

Certificate

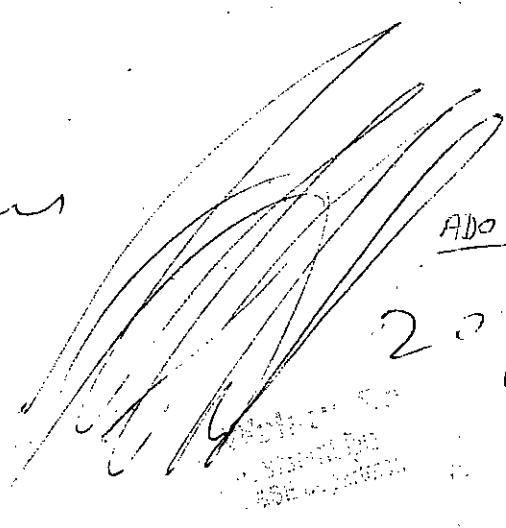
Amnosc D. (16) P-~~(14)~~

It is certified that Mr. Sarfara s/o Umarfaad has not been remained as pgt teacher in circle Kuzabanda and in apts Bandichavised as per school record and as per report of head teacher after checking & verification of school record.

Muhammed Fajar
ASDEO
circle Kuzabanda.
20/10/16
ASDEO
Bharatpur

It is certified that Mr. Sarfaraz
 S/o. Umarfaad has not been remained
 PST teacher in ups Bandicharigged
 circle Kuzbanda upto the best of
 my knowledge and capacity and during
 my duration and circumstances of
 authority from March 2014 to 30 May
 2016 and as per school record
 checked by the undersigned as well
 as per head teacher's report.

Wali-ur-Rahman
 ASDTO
 Circle Battagram



ADO

20/10/2016

عمران علیہ السلام SPST کے لئے پتہ لکھ کر PS کے لئے لکھ کر

تفصیلاً لکھ کر دیا ہے کہ PS کے لئے پتہ لکھ کر PS کے لئے لکھ کر
19/5/2016 کو PS کے لئے پتہ لکھ کر دیا ہے۔ لیکن PS کے لئے لکھ کر

عمران علیہ السلام

اس دوران میں سرگرمیوں کی سہولتوں کو سہولتوں میں دیا گیا ہے۔
اگرچہ یہ سہولتوں میں جاری ہے لیکن اس میں ڈیوٹی سہولتوں کو سہولتوں
دیا گیا ہے۔ جو اس بار میں کہ معلوم نہیں۔ لیکن اس بار میں
اس کے لئے لکھ کر دیا گیا ہے۔


عمران علیہ السلام - SPST کے لئے پتہ لکھ کر

سہولتوں کے لئے پتہ لکھ کر دیا گیا ہے

10-10-2016

verified
UZAIR USMAN KHAN
ASSISTANT SUPERVISOR
Officer (M) PALLA
2016

تصدیق کی جاتی ہے کہ میں نے جیسویہ پبلک اسکول، ایسٹ ٹوبا پاسٹو، ایسٹ ٹوبا پاسٹو اسکول کے جلمہ ایگڈ
2008 تا حال تک کیا۔ جسے سرخوز نامی PST کا لائٹنگ اور اسٹریٹ لائٹنگ کے طور پر
کونٹریکٹ نہیں ملا۔ سکول میں مذکورہ بندے کا لائٹنگ نام یا ٹرانسفر آرڈر
بھی موجود نہیں۔ جس کا مطلب یہ ہے کہ سرخوز نامی PST نے کبھی بھی
اس سکول میں کوئی سرانجام نہیں دیا 2008 تا 2016 جسٹریٹ لائٹنگ
مکمل اور لائٹنگ کی تصدیق شدہ لکھنؤ رپورٹ کے ساتھ منسلک ہیں۔


HEAD TEACHER
GPS Toba Pashto
Teh: Alai Distt: Battagram

فضل ربی PSHT

GPS ٹوبا پاسٹو

Mob #03469634970

CNIC #13201-9154470-9

میں سہمی فریاد حال P.S.T ڈیپٹی ایڈمنسٹریٹو آفیسر کے ہیکہ دہا ہوں نہ میں
18⁰⁹/₂₀₀₈ تا 16⁰⁴/₂₀₁₄ ڈیپٹی ایڈمنسٹریٹو آفیسر کا ایجنڈہ پیدائشی فریاد -

کیونکہ P.S.T کی اسامی خالی تھی۔ اس دوران سرفراز خان نامی شخص نے
نہ اس سکول میں چارج لیا ہے لہذا یہی ڈیپٹی ایڈمنسٹریٹو آفیسر ہے۔

جیکب میری ٹرانسفر ڈیپٹی ایڈمنسٹریٹو آفیسر کے ہیکہ دہا ہوں نہ میں
مکمل ادھرت حالت میں ایم عرفان اللہ P.S.T کے حوالے کیا تھا۔ جس میں کہتے ہیں کہ
کوئی کئی ڈیپٹی ایڈمنسٹریٹو آفیسر تھی۔

آج ڈیپٹی ایڈمنسٹریٹو آفیسر کے ہیکہ دہا ہوں نہ میں (جنوری 2013 تا جون 2013)
مکمل ادھرت ہے جیکب میری ٹرانسفر آرڈر تک اس ہیکہ میں کوئی کمی نہیں تھی اور سالم
حالت میں ایم عرفان اللہ کو hand over کیا تھا۔

اس دوران میں میرے ساتھ سکول میں صرف جیکب میری ٹرانسفر ایڈمنسٹریٹو آفیسر کے ہیکہ دہا ہوں نہ میں
رہا تھا۔ اور سرفراز خان نے ڈیپٹی ایڈمنسٹریٹو آفیسر کے ہیکہ دہا ہوں نہ میں
ادھرتی ڈیپٹی ایڈمنسٹریٹو آفیسر کے ہیکہ دہا ہوں نہ میں اپنا Transfer order
appointment Order دیا تھا۔

الکدری

فریاد P.S.T حال ڈیپٹی ایڈمنسٹریٹو آفیسر کے ہیکہ دہا ہوں نہ میں

10-10-2016

عنوان: درخواست بائیاں صدر خزانہ وغیرہ (13)

فیاب عالی! 2013 تک میں پی ایس ڈی گزرائس ہے کہ 1996 سے۔ سرخیز نامی اسٹاد میرے پاس میں لیا۔ اور نہ ہی ایسے کسی نہ جمعہ حاج لیا ہے۔

13/10/2016 کو صدر خزانہ نواز کھٹیب PSNT ریج کوئی سرزرا نامی اسٹاد میں لیا ہے۔ کو اختیار ملوں نہ کھٹیب PSNT ریج سنبالا۔ ستمبر 2016ء تا 10/2016ء کو اختیار ملوں نہ کھٹیب PSNT ریج سنبالا۔ کوئی اسٹاد سرخیز نامی میں لیا ہے۔

- 1) الہار حسین
- 2) انور حسین شاہ
- 3) مخت نواز نائیک
- 4) مخت نواز نائیک
- 5) مخت نواز نائیک
- 6) مخت نواز نائیک
- 7) مخت نواز نائیک
- 8) مخت نواز نائیک
- 9) مخت نواز نائیک
- 10) مخت نواز نائیک

10/10/16

Agreed with teachers forwarded to SDEO sb for further m/a pl. Approved by SDEO sb for further m/a pl. Assistant Sub-Div. Education Officer (M) P.T. Battagram

Annex - F. (22)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Annexure - G

EMAIL: emisbattagram@gmail.com BATTAGRAM PHONE NO: 0997311439



P-23

No: 17193-17209

Dated: 20/10/2016 Page(1/4)

Dr. Shahzad Khan Bangash
Secretary to Govt of Khyber Pakhtunkhwa
Elementary & Secondary Education Department
Peshawar

Subject:

GHOST / FAKE EMPLOYEES REGULARLY DRAWN THEIR SALARIES AGAINST VARIOUS COST CENTERS OF E&SE DEPARTMENT BATTAGRAM AND INFLECTED HUGE FINANCIAL LOSS TO THE PROVINCIAL EXCHEQUER AND NAB KP PESHAWAR INITIATED INQUIRY AGAINST AURANGZEB SENIOR AUDITOR & HAMID SUB-ACCOUNTANT DISTRICT BATTAGRAM AND OTHERS REGARDING MISUSE OF AUTHORITY

Memo:

The undersigned would like to invite your kind intention to the following facts:-

1. That National Accountability bureau KP Peshawar initiated captioned inquiry and communicated to the District Education Officer Battagram vide letter No: 1/609/IW-II/NAB(KPK)/1273 Dated 30-06-2016 for provision of complete record regarding salary slips , copy of CNIC & Appointment Orders of 18 employees of E&SE Department Battagram. (Copy Attached and annexed as Annex-A).
2. That this office made request to DAO Battagram for provision of monthly salary slips / Payroll Vide office letter No: 7051-53 Dated 11-07-2016 as the cost center was not mentioned in the letter of NAB KP.(Copy attached and annexed as Annex-B). In response to that DAO Battagram replied vide his office letter No: 471/2016 Dated 14-07-2016 and provide copy of payroll of the 16 Employees out of 18 (Copy attached and annexed as Annex-C).
3. That all the payrolls received from office of the DAO Battagram were submitted to Deputy Director (Coord) NAB KP Peshawar vide this office letter No: 7396 Dated 20-07-2016 (Copy attached and annexed as Annex-D).
4. That after provision of payrolls this office asked the DDOs / Head of Schools / SDEOs concerned for provision of copies of CNIC & Appointment order in respect of all those officials who had drawn salaries against their cost center. (Copy attached and annexed as Annex-E). All the concerned DDOs made reply with the contention that they never activated pay of the fake and ghost employees who had drawn salaries against their cost center (annexed as Annex-F1-F22).
Replies of the DDOs were communicated to NAB KP Peshawar vide this office letter No: 9132-33 Dated 15-08-2016 (Copy attached and annexed as Annex-G).
5. That NAB Peshawar issued call Notices addressed to the Employees through DEO Battagram asking them to attend NAB Office Peshawar on 03-08-2016, however the same were received in this office on 9-8-2016 which were endorsed to concerned DDOs / Head of Schools / SDEOs vide this office letter No: 9134-41 Dated 15-08-2016(Copy attached and annexed as Annex-H1 to H2).
6. That Mr. Naeemullah Investigation Officer NAB KP Peshawar intimated his schedule of visit to the office of the DEO (M) Battagram on 17-08-2016 and asked that attendance of all the DDOs in the proceeding is mandatory and same may be ensured please. Accordingly the instruction of the investigation officer was communicated to the concerned DDOs / Heads of the Schools / SDEOs through this office letter No: 9144-52 Dated 15-08-2016 (Copy attached and annexed as Annex-I).

22911

That IO initiated the proceeding on 17-08-2016 in the office of the undersigned and subsequently on 18-08-2016 recorded the statements of the DDOs and also served a format upon the DDOs and asked them for their concluding remarks against each employee drawn pay against their cost center. (Copies attached and annexed as Annex- J1-J8).

~~24~~

- 8. That the DDOs facing the inquiry made request to the DAO Battagram to provide the copies of the following documents to judge their legal sanctity and validity.
 - 1. Source 1 & 2,
 - 2. Appointment Order
 - 3. MC (Age and health Certificate,
 - 4. Pay release order from the competent authority.
 - 5. CNIC
 - 6. Charge Report.

9. That this office endorsed the request of the DDOs vide letter No: 9287-95 Dated 18-08-2016 to DAO Battagram for provision of said documents to enable the DDOs to avail the opportunity of defence. (Annexed as Annex-K1-K2)

10. That District Accounts Officer Battagram argued vide letter No: 620-23 Dated 18-08-2016 that keeping of such record is the responsibility of the concerned DDO and his office is unable to provide such type of record (Copy attached and annexed as Annex-L).

11. That on 19-08-2016 undersigned vide letter No: 9320-31 Dated 19-08-2016 again made request to the DAO Battagram that DDOs have no record in their offices regarding fake and bogus activation of pay in respect of ghost/ strangers persons drawn their pay through mal-practices without due process as required under the law. (Copy attached and annexed as Annex-M-1).

12. Undersigned submitted detail of case to Director E&SE KP Peshawar regarding the NAB inquiry and copies thereof to Secretary Finance Department, E&SED, Accountant General Additional Director E&SE Directorate & Deputy Commissioner Battagram (Copies attached and marked as M-2-M-4).

13. That it is further added that NAB KP Peshawar provided another list of 65 Employees for their pay slips and other record vide letter No: 1/609/IW- I/NAB(KPK)/1338 Dated 21-07-2016 (Copies attached and marked as Annex- N 1 - N3).

14. In pursuance to the same this office approached to the DAO Battagram through letter No: 8967-70 Dated 06-08-2016 as the cost center was not mentioned in the letter of NAB KP.(Copy attached and annexed as Annex-O1-O2).

15. In response to that DAO Battagram replied vide office letter No: 632 Dated 03-08-2016 and provide copies of payroll of all the 65 Employees (Copy attached and annexed as Annex-P).

That after provision of payrolls, this office checked it and found that 33 employees related to E&SE Department District Battagram while the other 32 belong to other various departments. Undersigned asked the DDOs / Head of Schools / SDEOs concerned vide letter No: 9908-15 Dated 01-09-2016 for provision of copies of CNIC & Appointment order in respect of all those officials who had drawn salaries against their cost center. (Copy attached and annexed as Annex-Q1-Q2).

16. All the concerned DDOs made replies with the contention that they never activated pay of the fake and ghost employees who had drawn salaries against their cost center except 04 out of 33 employees (annexed as Annex-R1-R21).

17. That replies of the DDOs and Payrolls provided by the DAO Battagram were communicated to NAB KP Peshawar vide this office letter No: 10365-71 Dated 19-09-2016 (Copy attached and annexed as Annex-S1-S3).

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18. In response to Deputy Commissioner Battagram office letter No. 6179/AE Dated 31-08-2016. brief history / detail of the case of ghost / fake employees reported by NAB KP Peshawar along with mentioned enclosures have already been communicated to DC Battagram vide this office letter No. 10511-17 Dated 22-09-2016. Copy attached and marked as annex-T1-T2)
19. The NAB KP Peshawar asked information, letters / Orders bearing Endst: Numbers on 7-10-2016 detail of which is mentioned in letter, reply to NAB made vide this office letter No: 12030-32 Dated 14-10-2016. (Copies attached and marked as AnnexU1 to U-18) NAB further asked all the DDOs concerned to attend NAB Peshawar Office on 13-10-2016 and this office informed all the DDOs to attend so (Copy attached and annexed as annex-V)

In the light of above facts , you are requested to initiate departmental inquiry against all those officers / officials who have committed misuse of authority and inflicted such a huge loss to Govt treasury through mal-practices.

Detail of fake appointees / Ghost / Strangers employees who had drawn salaries through various DDO Codes / Cost centers are submitted as below:

S.No	AG P.NO	NAME EMPLOYEE	OF	DDO CODE	SCHOOL / OFFICE NAME
1	711974	SHAH FAISAL		BM 7033	SDEO (M) Battagram
2	701740	Qazi Rashid Hussain		BM 7033	SDEO (M) Battagram
3	684967	Khyal Muhammad		BM 7033	SDEO (M) Battagram
4	699014	Sarfaraz Khan		BM 7033	SDEO (M) Battagram
5	660390	Fazal Wahab		BM 7033	SDEO (M) Battagram
6	718733	SHAH JEHAN		BM 7034	SDEO (M) Battagram
7	718805	MUHAMMAD TARIQ		BM 7034	SDEO (F) Battagram
8	705608	NAVEEDA TARIQ		BM 7037	DDEO FEMALE BATTAGRAM
9	705607	Saima Gul		BM 7037	DDEO FEMALE BATTAGRAM
10	48646	Malik Hayat Khan		BM 7056	GHS SAKARGAH
11	720474	AFTAB ALAM		BM 7056	GHS SAKARGAH
12	720499	ETHISHAM UL HAQ		BM 7056	GHS SAKARGAH
13	720677	SHABANA BIBI		BM 7056	GHS SAKARGAH
14	720679	ASIM FAHEM		BM 7056	GHS SAKARGAH
15	709109	FAISAL LATIF		BM 7056	GHS SAKARGAH
16	721561	IMTIAZ ALI KHAN		BM 7056	GHS SAKARGAH
17	721562	IHSAN KHAN		BM 7056	GHS SAKARGAH
18	706742	Ismail Shah		BM 7067	GHS HUTAL BATKOL
19	718804	MUHAMMAD ADNAN		BM 7067	GHS HUTAL BATKOL
20	718227	Muhammad Naeem		BM 7070	GHS ASHARBAN
21	718138	MUHAMMAD IQBAL		BM 7070	GHS ASHARBAN
22	718811	AAMIR ZESHAN		BM 7070	GHS ASHARBAN
23	720678	ABDUL AWAL		BM 7070	GHS ASHARBAN
24	718806	ANWAR ZAIB		BM 7070	GHS ASHARBAN
25	718808	NAYAT SHAH		BM 7070	GHS ASHARBAN
26	706741	Neelam		BM 7063	GGHS BANIAN
27	702876	Nazia Hassan		BM 7063	GGHS BANIAN
28	701739	Jisarat Bibi		BM 7063	GGHS BANIAN

29	704377	NAEEMA	BM 7063	GGHS BANIAN
30	718734	NADIA NOOR	BM 7063	GGHS BANIAN
31	718810	UZMA NOREEN	BM 7063	GGHS BANIAN
32	720475	SHAHNAZ BEGAM	BM 7063	GGHS BANIAN
33	720682	FARAH NAZ	BM 7063	GGHS BANIAN
34	720683	HUMA	BM 7063	GGHS BANIAN
35	702865	KIRAN QAYUM	BM 7063	GGHS BANIAN
36	709118	ZARKA RONAQ	BM 7063	GGHS BANIAN
37	718228	AROOJ TEHSEEN	BM 7063	GGHS BANIAN
REPORTED BY HEADMASTER GHS HUTAL BATKOOL OTHER THAN NAB INQUIRY				
38	524242	Shahid CT	BM 7067, 6082	GHS HUTAL BATKOL
39	431101	Muhammad Zahoor SST	BM 7067, 6082	GHS HUTAL BATKOL
40	709119	Yasir Amin TT	BM 7067, 6082	GHS HUTAL BATKOL

- Sd.
District Education Officer (Male)
Battagram

Dated: ___/10/2016.

Endstt: No: _____

Copy for information & n/a to the:

1. Secretary Government of KP Finance Department Peshawar.
2. Accountant General KP Peshawar.
3. Director E&SE Department Peshawar
4. Additional Director Establishment Directorate of E&SE KP Peshawar.
5. Mr. Naeemullah Investigation Officer NAB KP Peshawar.
6. Deputy Commissioner Battagram.
6. District Accounts Officer Battagram.
8. SDEO (M) Battagram & Allai.
9. All the DDOs / Head Masters Concerned.

Page(4/4)


District Education Officer (Male)
Battagram

Annexure C (26)
Annexure E

16

Certificate

It is to certify that we the following ASDEOs/Dealing Assistants of this Sub Division declared that we have not processed/maintained the service record i.e service books, charge report, source I and II etc in respect of the following persons who have drawn illegally amount from the Govt. treasury as salaries., there is no record in this office regarding their service,

- 1. Khyal Muhammad S/O Nooran Shah R/O Rashang Allai.
- 2. Sarfaraz Khan S/O Umar Faad R/O Kas Qalandar Allai.

Signatures of ASDEOs

- 1. Muhammad Fayaz AS DEO *[Signature]*
- 2. Wali ur Rehman AS DEO *[Signature]*
- 3. Gul Rahman AS DEO *[Signature]*
- 4. Zahbi Ullah AS DEO
- 5. Niamatullah Suptd; *[Signature]*
- 6. Mohammad Zubair, Suptd; *[Signature]*

Signatures of Dealing Assistants

- 1. Mustafa TC Clerk *[Signature]* ^{Retinal} ₁₋₄₋₂₀₁₄
- 2. Shahidin senior Clerk *[Signature]*
- 3. Shad Muhammad TC Clerk *[Signature]*
- 4. Ameer Muhammad JC *[Signature]*
- 5. Atta Ur Rahman JC *[Signature]*
- 6. Mohammad Afzal S.C. *[Signature]*

Sub Divisional Education
Officer Male Education

[Signature]

20/10/2016

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**DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA.**

No. 3570 /F.No.162/Vol:15/Appeal of
PST (M) General.
Dated Peshawar the 12/11/2018.

The District Education Officer (M)
Battagram.

Subject: DEPARTMENTAL APPEAL.

Memo:

I am directed to refer to your letter No.9766 dated 05.09.2018 on the subject cited above and to state that the appeal of the following teachers of District Battagram in light of DEO (M) Battagram report is hereby rejected.

1. Mr. Sarfaraz Khan PST GPS Toba Pashto Allai District Battagram.
2. Mr. Khial Muhammad PST GPS Lakhri Sar District Battagram.

I am further directed to ask you to inform the teacher concerned accordingly.

Deputy Director (Estab)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar

2

4/11/18

Encls: No. 1

1. P.A to Director Elementary and Secondary Education local office.

Deputy Director (L. Sub)
Elementary & Secondary E
Khyber Pakhtunkhwa Peshawar

2

4/11/18

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

SERVICE APPEAL NO 1376/2018 TITLED SARFARAZ KHAN

VS

DIRECTOR ELEMENTARY AND SECONDARY EDUCATION KP PESHAWAR

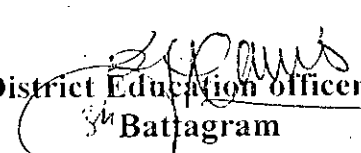
REPLY ON BEHALF OF RESPONDENTS/DEFENDENTS IN RESPECT OF
APPLICATION OF AMENDING IN SERVICE APPEAL NO 1376/2018

Respectfully sheweth,

In respect of above amending application reply is submitted before
This honorable service tribunal as under.
That the application has been submitted by appellant for amendment in
service appeal has time barred.
That the application is filed to prolong the litigation.
That the appellant wants to conceal the facts from this honorable service
tribunal.

PRAYER

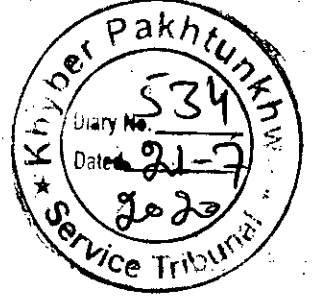
Hence it is requested that the application for amendment may kindly be
rejected.


District Education officer (Male)
3rd Battagram

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

In Re;

Service Appeal No. 1376/2018



Put up to the court with relevant appeal.

Sarfraz Khan

VS

Director elementary and secondary education K-P and others

Respondent

APPLICATION IN RESPECT OF AMENDING THE TITLED APPEAL BY IMPUGNING THE REJECTION OF DEPARTMENTAL APPEAL WHICH WAS INADVERTENTLY NOT IMPUGNED AND CHALLENGED

The appellant is pleased to beseech before this Honorable Tribunal as under;

1. That the above mentioned appeal no 1377/2018 is pending adjudication before this honorable tribunal and is fixed for **21/7/2020**.
2. That the departmental appeal was rejected by the respondents on 08/10/2018 vide letter no 3336/F.No.162/Vol:15/Appeal of PST (M) General which is already attached with main service appeal available at page no 54 but inadvertently not impugned which is no doubt necessary for the just decision of the service appeal in question.

PRAYER:

It is, therefore, most humbly prayed that on acceptance of this application the applicant may kindly be allowed to amend the service appeal No. 1376/2018 please.

Through

Applicant

(Mian Muhammad Imran)

Advocate