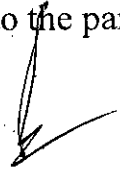



19.05.2023

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.



(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)


SCANNED
KPST
PESHAWAR

09.02.2023

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

**SCANNED
KPST
Peshawar**

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


(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.

SCANNED
KPST
Peshawar



(FAREEHA PAUL)
Member(E)




(ROZINA REHMAN)
Member (J)

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

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*


Reeder

07.06.2022

Clerk of learned counsel for the appellant present. Mr. Riaz Ahmad Paindakhel, Assistant Advocate General 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)
Member (E)


(Salah-ud-Din)
Member (J)

10.8.2022

*Proper DB not available the case is
adjourned to 2.11.22*

Reeder

01.02.2021

Due to COVID-19, the case is adjourned to 13.04.2021 for the same.



Reader

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

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.



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



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

30-9-21

Due to Non Availability of me
DB the case is adjourned to

5-1-2022




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)

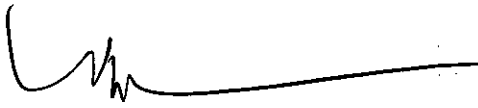

(Rozina Rehman)
Member (J)

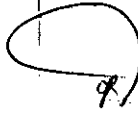
18.11.2020

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

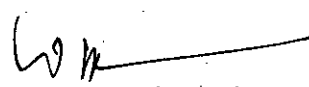
Due to COVID-19, the case is adjourned to 21.07.2020
for the same.


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

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

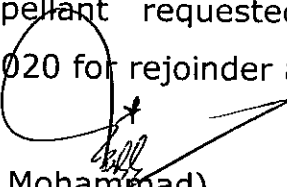
Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak, Additional AG for the respondents present. Adjourned to 05.03.2020 for rejoinder and arguments before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

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

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

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

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


Member

16.04.2019

Clerk to counsel for the appellant present. Written reply on behalf of respondent No.3 is still awaited. No one present on behalf of respondent No.3. Again notice be issued to respondent No.3 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 3rd 05.2019 before S.B.


Member

~~16.04.2019~~

~~Clerk to counsel for the appellant present. Written reply on behalf of respondent No.3 is still awaited. No one present on behalf of respondent No.3. Again notice be issued to respondent No.3 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 3.05.2019 before S.B.~~

~~Member~~

1377/18

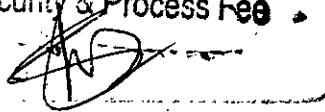
03.12.2018

Counsel for the appellant present.

Learned counsel for the appellant contends that the salary of the appellant was stopped without assigning any reason. Despite repeated reminders and departmental appeal, his grievance was not redressed. Even in the order of rejection of appeal dated 08.10.2018 no reason was shown for the stoppage of the salary. Till date, the cause for penalizing the appellant has not been disclosed by the respondents.

Instant appeal, in the light of material available on record and arguments of the learned counsel for the appellant, warrants admission for regular hearing. Admit. The appellant is directed to deposit security and process fee within 10 days. Notices be issued to the respondents for submission of written reply/comments on 28.01.2019 before S.B.

Appellant Deposited
Security & Process Fee



Chairman

28.01.2019


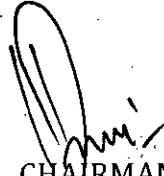
Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Wali-ur-Rehman, ADO for respondent No. 1 & 2 present and submitted written reply. Representative of respondent No. 3 is not present therefore, notice be issued to respondent No. 3 with the direction to direct the representative 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

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. _____ 1377/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/11/2018	<p>The appeal of Mr. Khalid Muhammad 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.</p> <p style="text-align: right;"> REGISTRAR 07/11/18</p>
2-	17-11-2018	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>3-12-18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Service Appeal No. 1377 / 2018

Khial Muhammad (PST) (BPS-12) S/O Nooran Shah R/O Village Rashang, Allai,
Battagram

.....Appellant

VS

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

INDEX

<u>S.NO</u>	<u>DOCUMENTS</u>	<u>FLAG</u>	<u>PAGE</u>
1.	Service Appeal		1-5
2.	Copy of Appointment Order	A	6
3.	Copy of Service Book, Pay Slips Etc	B	7-44
4.	Copy of Request Application	C	45
5.	Copy of other Applications	D	46-50
6.	Copy of Departmental Appeal	E	51
7.	Copy of Reminder	F	52
8.	Copy of Rejection of Departmental Appeal	G	53-54
9.	Wakalatnama		55

Through

Appellant


(Mian Muhammad Imran)
Advocate High Court

(1)

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

Service Appeal No. _____/2018

Khial Muhammad (PST) (BPS-12) S/O Nooran Shah R/O Village Rashang, Tehsil Allai, District 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 (06/07/2008) 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 06/07/2008 on the recommendation of the Departmental Selection Committee and approval of the competent authority and was directed to perform his duties at "GPS Lagri Sar Nasim, 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 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)*
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 26th 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.
- 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

(5)

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

Service Appeal No. _____/2018

Khail Muhammad (PST) (BPS-12) S/ONooran Shah R/O Village Rashang, 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 26th 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

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDRY EDU: BATTAGRAM. (6)

APPOINTMENT:

Consequence upon the recommendation of the Departmental Selection Committee and Approval of the competent authority the appointment of Mr. Khial Muhammad S/O Nooran Shah n.o Rashang is hereby Ordered in BPS No 07 (5800-230-15400) plus usual allowance as admissible Under the rules in the interest of public Service GPS Laghri Sar nasim against vacant post with immediate effect

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 health 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 shall not be entertained.


-sd-
EXECUTIVE DISTRICT OFFICER
ELE: & SEC: EDU: BATTAGRAM.

Order No 3192-96 EB, AE-II/F, Appt:

Dated 06/07/2008

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.

(For use in Police Department only)

7

Hairs:

1. Passed the SSL Exam from BISE Abad.
2. Under Roll No: 29975. Session. 1995. no. 523/850
3. R.P.O 29/10/1995.

Verification Roll No.

dated

Deputy District Officer
Received back
 (Male) Primary Sattagram

Passed the P.T.C Exam - from Skill People Council
 W. Training Ordinance Act 1980. Technology School
 Urdu Road 17508 - Sattagram - 2004-05.

Left Thumb Impression

[Signature]
 27-10-95 (19)
 Baiter

Qualification	Date	Qualification	Date
English		First Arts	
Pashto		B.I. Or B.A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger Print		Other qualification:—	
Drill Instructing			
Court Duties			
Reserve Duties			

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

8

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

1. Name: Khalid Muhammad

2. Race: Syed

3. Residence: village Raskag. Teh. Allah. District Battagram

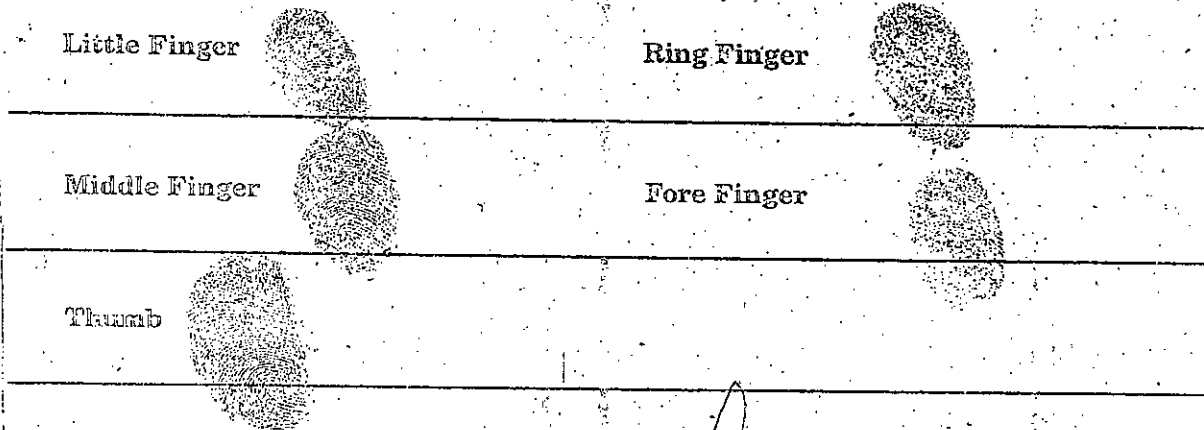
4. Father's name and residence: Noor Shah.


5. Date of birth by Christian era as nearly as can be ascertained: 25-6-1978
Twenty five of June. N.H. Semyerigal

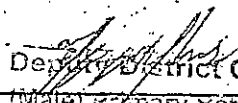
6. Exact height by measurement: 5-5

7. Personal marks for identification: XXI

8. Left hand thumb and finger impression of (Non-Gazetted) officer:



9. Signature of Government Servant: 

10. Signature and designation of the Head of the Office, or other Attesting Officer: 
Deputy District Officer
(Male) Primary Battagram

9

4

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Act 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "per" in the column	Date of appointment	Signature of Government Servant.	Signature and of the head of or other official in the column
T.G.P.S.			3530-	190-9230-7		7-2008		
P.S. Laghari Sar Nasir			3530/-			12/08		
P.S. Barsa			3720/-					
G.P.S. Laghari Sar Nasir								
G.P.S. Barsa			5800-3720	15400-7		13-2011		
G.P.S. Laghari Sar Nasir			3720			12/2012		
G.P.S. Barsa			6120/-			7-2012		
			7000/-			12/2012		
			7500/-			12/13		
			8000/-					

13

00684967, KHAYAL, MOHAMMAD, CNIC# 320118344910, Grade: 12, NTN# 000000002, GPF# 19,720.00

0001 Basic Pay	7,500.00	3012 GPF Subscription - Rs	1,160.00-	GPF#:	19,720.00
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 UAF-OTHER 20% (1-15)	1,000.00				
1949 Adhoc Allowance 2010	1,160.00				
1970 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow (1,500.00				
2148 15% Adhoc Relief All	1,125.00				

PAYMENTS: 16,181.00- DEBITIONS: 4,680.00- NET PAY: 11,501.00-
Branch Code: 241320, Muslim Commercial Bank, AMC, ABBOTABAD, AGENC NO: 6479475

15

00684567, KHYAL, MOWA... CNIC: 3320118344910... Designation: ... Grade: HT/NTN... Buckles: No... Gated/Non-Gated: ...

0001 Basic Pay	7,500.00	3012 GPF Subscription - Rs	1,160.00-	GPF#:	22,040.00
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-		
1210 Convey Allowance 20	2,720.00	3511 Adtl Group Insurance	13.00-		
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-		
1923 UAA-OTHER 20% (1-15)	1,000.00				
1948 Adhoc Allowance 2010	1,160.00				
1970 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow 1	1,500.00				
2148 15% Adhoc Relief All	1,125.00				

PAYMENTS: 16,181.00- DEDUCTIONS: 468.00- NET PAY: 15,713.00-
Branch: Code: 241320... Muslim Commercial Bank... ARBOTABAD... Account No: 66479-4

16

00604967 KHALI MOHAMMAD... CNIC No: 201183449102... Grade: 12... Buckle No: ... GPF: ... 23,200.00

0001 Basic Pay	7,500.00	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		
1946 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow (1,500.00		
2148 15% Adhoc Relief All	1,125.00		

PAYMENTS: 18,181.00 DEDUCTIONS: 1,468.00
Branch Code: 241320... Muslim Commercial Bank... AMCN... ABBOTABAD... Adh... No: 64794...

18

00584067 MOHYA, MOHAMMAD CNIC:4132018344910783381 Desig: (00000002) Grade: 12 BENEFIT: 14766800 PAY: 25,520.00

0001 Basic Pay	8,000.00	3012 GPF Subscription - Rs	1,160.00-	GPF#:	25,520.00
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-		
1100 Medical Allowance	1,000.00	3511 Addl Group Insurance	13.00-		
1973 UAA-OTHER 20% (1-15)	1,000.00	3604 Group Insurance	115.00-		
1948 Adhoc Allowance 2010	1,160.00				
1970 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow (1,600.00				
2148 15% Adhoc Relief All	1,200.00				

PAYMENTS: 16,136.00 DEDUCTIONS: 468.00
 Branch Code: 2413204 AMC

19

00684967 RYAL/POHNA/... CNIC: 3320118349105... (00000002) Grade: 212RN... Bookle No... Garbled/Non-Garbled...

				GPF#:	26,000.00
0001 Basic Pay	8,000.00	3012 GPF Subscription - Rs	1,160.00-		
1000 House Rent Allowance	1,306.00	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-		
1945 Adhoc Allowance 2010	1,160.00				
1970 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow 1	1,600.00				
2148 15% Adhoc Relief All	1,200.00				

PAYMENTS 16,136.00 DEDUCTIONS 1,468.00 NET PAY 14,668.00... Branch Code: 241320... AMC... ABBOTABAD...

20

01484967 KHYAL MOHAN... CHIC... (00000002) ... Grade: A12B... No. 115... Retired/Non-Retired

				GPF#:	26,680.00
0001 Basic Pay	8,000.00	3012 GPF Subscription - Rs	1,160.00-		
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-		
1300 Medical Allowance	1,000.00	3511 Addl Group Insurance	13.00-		
1403 UAA-OTHER 20% (1-15)	1,000.00	3604 Group Insurance	115.00-		
1948 Adhoc Allowance 2010	1,160.00				
1970 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow (1,600.00				
2148 15% Adhoc Relief All	1,200.00				

PAYMENTS: 16,136.00
 DEDUCTIONS: 1,468.00
 NET PAY: 14,668.00
 Branch Code: 241320

21

00681967, KYAL HOI... CHIC... 3201103449105105... 100000002... Grade 12... Non-Celestial...

0001 Basic Pay	8,000.00	3012 GPF Subscription - Rs	1,160.00-	GPF:	26,680.00
1010 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-		
1710 Convey Allowance 20	2,720.00	3511 Addl Group Insurance	13.00-		
1100 Medical Allowance	1,000.00	3604 Group Insurance	115.00-		
1923 UAA-OTHER 201(1-15)	1,000.00				
1948 Adhoc Allowancu 2010	1,160.00				
1970 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow (1,600.00				
2148 15% Adhoc Relief All	1,200.00				

PAYMENTS: 18,866.00 DEDUCTIONS: 1,468.00 NET PAY: 17,398.00
Branch Code: 241320... Commercial Bank... ARBOTABAD... 24647964

22

DD684967 KHAYAL MOHAMMAD 1920 1834 810 20 20 Basic (100000002) Grade 22 NTN

0001 Basic Pay	8,000.00	3012 GPF Subscription - Rs	1,160.00-	GPF#:	56,680.00
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	150.00-		
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				
1948 Adhoc Allowance 2010	1,160.00				
1978 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow (1,600.00				
2148 15% Adhoc Relief All	1,200.00				

PAYMENTS: 18,856.00 DEDUCTIONS: 1,438.50
 Branch Code: 241320 AMC Muslim Commercial Bank Abbottabad

29

00004967 KHAYAL MOHAMMAD
CNIC: 320118344970
Grade: (00000002) INGrade: 15
BUDGET: 18726600
Non-Gratified/Non-Gratified

0001 Basic Pay	8,000.00	3012 GPF Subscription - Rs	1,160.00		
1000 House Rent Allowance	1,306.00	6211 CH RP Fund IDP, S-MW-2	258.00	GPF#:	18,560.00
1210 Convey Allowance 20	2,856.00	3501 Benevolent Fund	180.00		
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		
1948 Adhoc Allowance 2010	1,160.00				
1970 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow 1	1,600.00				
2148 15% Adhoc Relief All	1,200.00				
2174 Adhoc Relief Allow-2	800.00				

PAYMENTS: 19,992.00
 DEDUCTIONS: 1,266.00
 Branch Code: 241320
 ABBOTABAD
 18726600
 2014

25

00084967 KRYAL HANSEN CHICAGO 20118344910

0001 Basic Pay	8,000.00	3501 Benevolent Fund	180.00-
1100 House Rent Allowance	1,306.00	3511 Addl Group Insurance	13.00-
1710 Convey Allowance 20	2,856.00	3604 Group Insurance	115.00-
1100 Medical Allowance	1,200.00		
1923 UAA-OTHER 204(1-15)	1,000.00		
1948 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow 1	1,600.00		
2148 15% Adhoc Relief All	1,200.00		
2174 Adhoc Relief Allow-2	800.00		
5011 Adj Conveyance Allow	10,500.00	3012 GPF Subscription - Rs	1,160.00-

GPF: 19,720.00

PAYMENTS: 307492.00
 DEDUCTIONS: 160.00
 NET PAY: 297024.00
 Branch Code: 241320

00584967 CIVIL SERVICE COMMISSION CHICAGO 19201834491000000002

0001 Basic Pay	8,000.00	3012 GPF Subscription - Rs	1,160.00-	GPF#:	20,880.00
1009 House Rent Allowance	1,306.00	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 204(1-15)	1,000.00				
1948 Adhoc Allowance 2010	1,160.00				
1970 Adhoc Relief Allow 2	870.00				
2118 Adhoc Relief Allow 1	1,600.00				
2148 154 Adhoc Relief All	1,200.00				
2174 Adhoc Relief Allow-2	800.00				

PAYMENTS 19,992.00 DEDUCTIONS 2,468.00 NET PAY 17,524.00

Branch Code: 241320

28

7061047... 000002... Grand...

010: Basic Pay	8,000.00	2012 GPF Subscriptions - us	1,160.00		
1000 House Rent Allowance	1,360.00	3501 Ben-volent Fund	180.00		25,706.00
1210 Convey Allowance -2C	2,855.00	3511 Adm'l Group Insurance	12.75		
130: Medical Allowance	1,200.00	3601 Group Insurance	115.00		
197: OVA-OTHER 204(1-15)	1,060.00				
1948 Adhoc Allowance 2010	1,160.00				
1979 Adhoc Relief Allow 2	870.00				
2119 Adhoc Relief Allow 1	1,600.00				
2149 151 Adhoc Relief All	1,200.00				
2174 Adhoc Relief Allow-2	800.00				

PAYMENTS: 19/992/000... 1,460.00...
 Branch Code: 241320...

00884967 MICHAEL JOHNSON... 24,360.00

0001 Basic Pay	8,505.00	3012 GPF Subscription - R4	1,160.00-
1068 House Rent Allowance	1,706.00	3501 Benevolent Fund	180.00-
1710 Convey Allowance 20	2,356.00	3511 Addl Group Insurance	13.00-
1309 Medical Allowance	1,200.00	3604 Group Insurance	115.00-
1971 UAA-OTHER 20(1-15)	1,000.00		
1948 Adhoc Allowance 2010	1,160.00		
1948 Adhoc Relief Allow 2	870.00		
7118 Adhoc Relief Allow 1	1,700.00		
2148 151 Adhoc Relief All	1,275.00		
7114 Adhoc Relief Allow-2	850.00		

GPF:

PAYMENTS: 24,360.00
Deductions: 1,680.00
Net Pay: 22,680.00
Branch Code: 241320

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00684967 KHILAL, MOHAMMAD
 CHICAGO 32011344910
 (00000002) Grade 22
 CPFE: 25,520.00

0001 Basic Pay	8,500.00	3012 GPI-Subscription - R	1,160.00-
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-
1100 Medical Allowance	1,200.00	3511 Addl. Group Insurance	13.00-
1971 UAA-OTHER 201(1-15)	1,300.00	3604 Group Insurance	115.00-
1948 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow 1	1,700.00		
2148 15% Adhoc Relief All	1,275.00		
2174 Adhoc Relief Allow-2	850.00		

PAYMENTS: 17,861.00
 DEDUCTIONS: 1,468.00
 Branch Code: 241320

00084967... (00000002) ...

0001 Basic Pay	4,800.00		
1000 House Rent Allowance	891.00		
1210 Convey Allowance 20	850.00		
1300 Medical Allowance	1,000.00		
1923 USA-OTHER 20(1-15)	960.00		
1948 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow 1	960.00		
5002 Adjustment House Ren	4,236.00	3501 Benevolent fund	120.00-
5011 Adj Conveyance Allow	4,600.00	3511 Addl Group Insurance	3.00-
5012 Adjustment Medical A	4,000.00	3604 Group Insurance	58.00-
5801 Adj Basic Pay	24,480.00		
5887 Adj Unatract Area A1	4,000.00		
5898 Adj. Adhoc Allowance	4,640.00		
5911 Adj. Adhoc Relief 20	3,980.00		

PAYMENTS 61,447.00 ... Branch Code: 241320

33

0060967... (00000002)...

1101 Basic Pay	4,800.00	3501 Beneferent Fund	120.00-
1800 House Rent Allowance	831.00	3511 Adml Group Insurance	3.00-
1710 Convey Allowance 2G	1,500.00	3604 Group Insurance	58.00-
1300 Medical Allowance	1,000.00		
1423 HAA-OTHER 201(1-15)	960.00		
1948 Adhoc Allowance 201C	1,167.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow (960.00		

PAYMENTS... DEBIT... COMMERCIAL BANK... BRANCH CODE 441320

34

00584967 KHAYAL MOHAMMED... 1000000021... 120119144910...

0001 Basic Pay	7,000.00		
1000 House Rent Allowance	1,306.00		
1210 Convey Allowance 2C	2,000.00		
1300 Medical Allowance	1,000.00		
1923 HAA-OTHER 201(1-15)	1,000.00		
1948 Adhoc Allowance 201C	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow 1	1,400.00		
5002 Adjustment House Ren	700.00	3501 benevolent Fund	180.00-
5011 Adj Conveyance Allow	300.00	3511 Addl Group Insurance	13.00-
5801 Adj Basic Pay	4,400.00	3604 Group Insurance	115.00-

PAYMENTS: 21,167.00
Branch Code: 241320

35

0001 Basic Pay	7,000.00	3501 Benevolent Fund	120.00-
1000 House Rent Allowance	1,306.00	3511 Addl Group Insurance	13.00-
1210 Convey Allowance 20	2,000.00	3600 Group Insurance	115.00-
1300 Medical Allowance	1,000.00		
1923 UNL-OTHER 20(1-15)	1,000.00		
1948 Adhoc Allowance 1010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
7118 Adhoc Relief Allow 1	1,400.00		

PAYMENTS
Branch Code: 241320

0000000021 Grade 22878 Buckle No. 126474/ Rom. C. 4164

0068-967; KYLAD, POBAND			
			180.00-
0801 Basic Pay	7,000.00	3501 Demerit Fund	13.00-
1000 House Rent Allowance	1,506.00	3511 Addl Group Insurance	115.00-
1210 Convey Allowance 20	2,000.00	3604 Group Insurance	
1300 Medical Allowance	1,000.00		
1443 UNA-OTHER 20(11-15)	1,000.00		
1948 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow 1	1,460.00		
	18,736.00		

PAYMENTS 18,736.00
Branch Code: 441320

37

00684967 KHIAL MOHAMMED 24132033 16-11-2018 16:38:00

0001 Basic Pay	1,500.00	3501 Servolent Fund	180.00-
1000 House Rent Allowance	1,306.00	3511 Addl Group Insurance	13.00-
1210 Convey Allowance 20	2,000.00	3604 Group Insurance	115.00-
1300 Medical Allowance	1,000.00		
1973 UAA-OTHER 204(1-15)	1,000.00		
1948 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow 1	1,500.00		

PAYMENTS: 16-11-2018 16:38:00
Branch Code: 24132033

39

00684967: KHAL, MOHAMMAD: CNIC: 4320118343910: Designation: (00000002): Grade: 12: Branch Code: 41320: Non-Garanteed

0001 Basic Pay	7,500.00	3501 Benevolent Fund	190.00
1000 House Rent Allowance	1,306.00	3511 Addl Group Insurance	13.00
1210 Convey Allowance 20	2,729.00	3604 Group Insurance	115.00
1300 Medical Allowance	1,000.00		
1923 UAA-OTHER 20% (1-15)	1,000.00		
1940 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2110 Adhoc Relief Allow 1	1,500.00		

PAYMENTS: 17,056.00: DEDUCTIONS: 308.00: NET PAY: 16,748.00: NO: 503R201844810212019: Branch Code: 41320: Commercial Bank: AMC: KARACHI: ABBOTABAD: KHARAKER NO: 64/14

0084967

300 Basic Pay	7,500.00	3501 Benevolent Fund	180.00
100 House Rent Allowance	1,100.00	3111 Adml Group Insurance	13.00
1719 Convey Allowance 23	2,720.00	3694 Group Insurance	115.00
1306 Medical Allowance	1,000.00		
1973 ODA-OTHER 208(1-15)	1,000.00		
1918 Adhoc Allowance 2016	1,160.00		
1910 Adhoc Relief Allow	576.00		
1918 Adhoc Relief Allow	1,500.00		

PAYMENTS
Branch Code: 24120

40

41

00004967 KHIAL MOHAMMAD (00000000) Grade: SP2
GPF#: 26,680.00

0001 Basic Pay	7,500.00	3012 GPF Subscriber - Rs	1,160.00-
1000 House Rent Allowance	1,306.00	3501 Benevolent Fund	180.00-
1210 Convey Allowance 20	2,720.00	3511 Adml Group Insurance	13.00-
1300 Medical Allowance	1,000.00	3604 Group Insurance	115.00-
1923 UAA-OTHER 204 (1-15)	2,000.00		
1948 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow 1	1,500.00		

NET PAY: 26,680.00
Branch Code: 241320

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0066-9077 NIMAL HOBRAND ... CHICKEN ... 18,560.00

0001 Basic Pay	7,500.00	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	3502 Group Insurance	115.00-
1923 UAA-OTHER 20a(1-15)	1,000.00		
1940 Adhoc Allowance 2010	1,160.00		
1970 Adhoc Relief Allow 2	870.00		
2118 Adhoc Relief Allow 1	1,500.00		
2148 15% Adhoc Relief All	1,125.00		

PAID BY ... Branch Code: 241320

کمیٹی صبا - DEO(M), Ballagram (ضلع بگرام)

عنوان! التماس و درخواست برائے ریٹائرمنٹ آف

صبا - عائی!

گزشتہ سائل گورنمنٹ ڈپارٹمنٹ
 اسکول لکڑی سر ایس ایم میں بحیثیت PS ڈپوٹی سر ایس ایم
 اہلیہ - یہ کہ میری تنخواہ اس عینے یعنی مارچ 2015
 میں جاری نہیں کی گئی۔ میں متعلقہ افراد اور ملازمین کے
 پاس بھی گیا لیکن مجھے کوئی کھوس جواب نہ بتایا۔
 جیسا کہ یہ ایک حقیقت ہے کہ سرکاری ملازم کا ایک ہی
 ذریعہ ہوتا ہے اور وہ تنخواہ ہوتی ہے جس سے وہ عام گورنمنٹ
 ملازمین میں سال 2008 سے ڈپوٹی سر ایس ایم دے رہے ہیں
 اور آج تک کبھی بھی میری تنخواہ بند نہیں ہوئی۔ مگر آج مارچ
 2015 کی تنخواہ جاری نہیں کی گئی جس کی وجہ سے میں بہت پریشان
 ہوں۔

لہذا التماس ہے کہ حکم جاری فرمائیں تاکہ میری
 تنخواہ جاری ہو سکے۔

العارہیں
 میں اور میری تمام فیملی دعا گو رہتی۔

عیال محمد
 (PS) گورنمنٹ ڈپارٹمنٹ اسکول لکڑی سر ایس ایم

Dated 11/3/2015

حضرت بنی - ڈسٹرکٹ ایجوکیشن آفیسر (میل) ضلع ملتان

عنوان - ریگیز آف بے

(47)

بنی - عالی

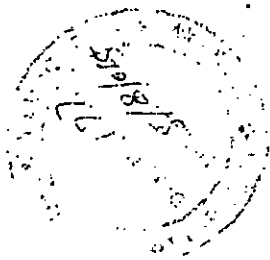
گزارشیں ہمیں ملنے والی گورنمنٹ پرائمری سکول
لفظی ٹیسٹ میں نچھتیت PST ڈیوٹی سرانجام
درا رہے۔ یہ کہ نامعلوم وجوہات کے بنا پر
بائل کا تنخواہ عارضہ 2015 سے بند ہو گیا
یہ کہ بائل ایک عہدہ گھرانے سے تعلق رکھتا
لہذا بنی آگیا۔ کہ عہدہ میں عرض ہمیں
بائل کا تنخواہ ریگیز فرما کر مسترد
فرمایا۔

میں گزارش ہوگی

العارضہ - خیال فرمائیں PST

گورنمنٹ پرائمری سکول لفظی ٹیسٹ

Date - 05-08-2015



کبریت چا۔ ڈسٹرکٹ ایجوکیشن افسیر چا۔ (میل) صلہ شکرانہ

(48) عنوان اریبلز آف اے

چا۔ عالی

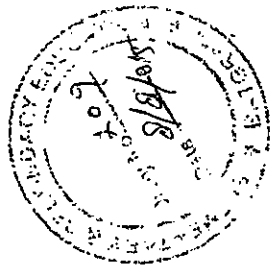
تشریح سے سائنس گورنمنٹ پرائمری سکول
لغوی سرٹیفیکٹ میں بحیثیت PST تدریس فی الرض
سراخام کے رہا ہے۔ یہ کہ نامعلوم ہے
کہ وہ سے سائنس کا تیسرا بار: 9 2015
سے بند ہو گیا ہے۔

یہ کہ سائنس ایک غریب گھرانے سے تعلق رکھتا
ہے لہذا آگیا۔ کہ خدمت میں غرض ہے کہ سائنس
تیسرا اریبلز فرما کر منسکود فرمائیں۔

عین نواز شیں ہوگی

العارضہ اخیال محمد PST
لغوی سرٹیفیکٹ
G.P.S

Date: - 08-08-2015



بخدمت عتاب DEO صاحب ضلع شکارپور

درخواست گزار / تنخواہ ریٹرن

جناب عالی

میں نے گذشتہ سال صوبہ سائیکل تنخواہ مارچ 2015 سے
 اپنی تنخواہ کے سائل کے آگے منظور اور ڈائریکٹریٹ صاحب کو بھی
 کافی درخواستیں دی تھیں ابھی تک تنخواہ شروع نہیں ہوئی۔
 سائل سال 2008 سے PST کی پوسٹ پر کام کر رہا ہے۔
 اور اس تنخواہ کی بندش سے پہلے بھی کچھ مسئلہ سامنے نہیں آیا۔
 میں ایک مکتوب ارسال بھی کر چکا ہوں اور اپنی اس تنخواہ سے اپنے بچوں
 کا پیسہ نکالتا ہوں۔ لہذا میری تنخواہ ریٹرن کی عطا
 میں کو وزارت ہوگی۔

آپ کا تعینادار

صہارل محمد (PST)
 گورنمنٹ پرائمری سکول لفظی سہیل
 3/3/2016ء

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 06/07/2008 as "PST" BPS-07 and was posted in "GPS Lajhari Sar Nasim, 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 adjusted on the post of PST and his pending salaries since the month of March 2015 till date 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.

Dated: 5/4/2018

Yours Sincerely,

(Khial Muhammad)

PST, GPS Lajhari Sar
Nasim, Allai, (699014)

S/O Nooran Shah

R/O Rashang, Tehsil

Allai, District Battagram

0301/5707200

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Received 5/4/18

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To

1. Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar
2. District Education Officer (M),
District Battagram

Subject: **REMINDER REGARDING DISPOSAL OF
DEPARTMENTAL APPEAL SUBMITTED
ON 05/4/2018**

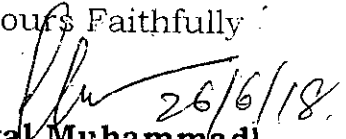
Respected Sir,

With due respect, it is submitted that the undersigned submitted departmental appeal/representation on 05/04/2018 regarding releasing of monthly salaries which has been stopped since March 2015. So far, there is no response forwarded regarding the fate of the aforesaid appeal. One of the employee of District Education, Battagram informed me that the appeal has been forwarded to the DEO (M) Battagram and after such, it will be decided.

It is therefore, most humbly requested that my appeal may kindly be allowed or disposed off so that I could see and carry out the needful regarding my service and career.

I shall be thankful to you.

Yours Faithfully


(Khayal Muhammad)
(PST) GPS Lagri Sar Naseem
District Battagram

53



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

No. 1688 / No. 16214 of 15 Appeal of
PST(M) General,
Dated Peshawar the 2/5 / 2018.

To,

The District Education Officer (M)
Battagram.

Subject:- DEPARTMENTAL APPEAL.

Memo:-

I am directed to refer to the subject cited above and to enclose herewith a copy appeal in respect of Mr. Khial Muhammad PST GPS Lajhri Sar District Battagram and to ask you to submit detail report/comments to this office within a week of the receipt of this letter positively.

M. J. 2/5/18
Assistant Director (Estab.)
Elementary & Secondary Edu.
Khyber Pakhtunkhwa Peshawar
2/5/2018

Encls: No. _____

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

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



A.D. & S.P. / 2/5/18
Fst m/ta
[Signature]

54.



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

No. 3570 / F No. 162/Vol: 15/Appeal of
PST (M) General.
Dated Peshawar the 21/11/2018.

To,

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 D.E.O (M) Battagram report is hereby rejected.

1. Mr. Saifuraz Khan PST GPS Toba Pashto Allai District Battagram.
2. Mr. Khial Muhammad PST GPS Lakhr 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
4/11/18

Encls: No. _____

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

Deputy Director (Estab.)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar
4/11/18

51864			
ایڈویکٹ:	پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: BC-13-4213			
رابطہ نمبر: 03339577770			

59

بعدالت جناب: سروس ٹریبونل خیبر پختونخوا پشاور

دعویٰ:	اپیل نمبر 1377/2018
علت نمبر:	
مورخہ:	سروس
جزم:	اپیل
تھانہ:	
منجانب: ضیاء محمد سلمہ آل الہی بدنگم	
بنام	
حکومت پختونخوا وچ	

بامث تحریر آتکہ

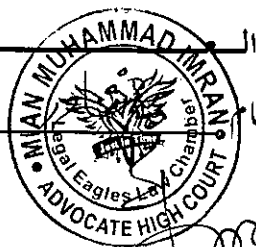
ضیاء محمد سلمہ آل الہی بدنگم

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام پشاور کیلئے ضیاء محمد عمران اینڈ محمد عزیز الرحمن و سوسائٹیز کے نام سے درخواست کی گئی ہے کہ اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم:

بد گواہ شد الع بد

کے لیے منظور ہے۔



M. M. Imran
AHC

Attested & Accepted
M. M. Imran

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

SERVICE APPEAL NO 1377/2018 TITLED KHIAL MUHAMMAD,

VS

DIRECTOR ELEMENTARY AND SECONDARY EDUCATION KP PESHAWAR

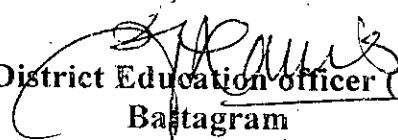
REPLY ON BEHALF OF RESPONDENTS/DEFENDENTS IN RESPECT OF
APPLICATION OF AMENDING IN SERVICE APPEAL NO 1377/2018

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 appellatant for amendment in
service appeal has time barred.
That the application is filed to prolong the litigation.
That the appellatant 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)
Baltagram

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1377 of 2018

Khial MuhammadAppellant

VERSUS

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

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S.No	Description /Documents	Annexure	Pages
1	Comments		1-6
2	Affidavit		07
3	Copy Dispatch Register, Copy Calendar July-2008	A-1, A-2	8-9
4	Copy of W.P No. 899-A/2016	B	10-11
5	Copy Report of SDEO	C	12-15
6	Copy of Report of Head Teacher	D	16-17
7	Copy of Letter addressed to Secretary E&SE KP Peshawar	E	18-21
8	Certificate of SDEO/ASDEOs & Office Staff	F	22
9	Appeal rejection letter	G.	23

Respondent

(1)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1377 of 2018

Khial MuhammadAppellant

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.

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 HAVING ENDSTT; NO. 3192-96 DATED 06-07-2008 ANNEXED BY THE APPELLANT IS FAKE, BOGUS, FABRICATED AND NOT ISSUED BY THE LAWFUL AUTHORITY. Endstt; NO. and date of issuing the order are not matching with office dispatch record. Moreover no order/letter was issued on 06-07-2008 from

this office as it was SUNDAY i.e HOLIDAY
on 06-07-2008 as per calendar July 2008. His
claim regarding recommendation of District
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, Calendar July
2008 and copy of writ petition are attached as
Annex: "A-1, A-2 & 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 was not on the strength of this department. As per statements of SDEO, ASDEOs and office staff neither his salary was not 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.

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.

5

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.

GROUND:

- 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 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

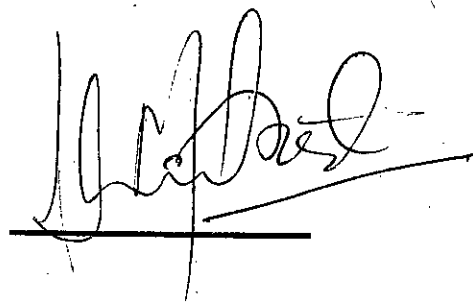
refund the amount received by him as salaries fraudulently/unlawfully.

- 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 was a civil servant.
- 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.

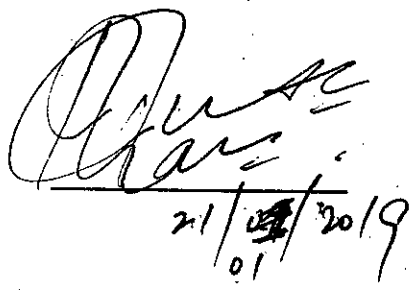
Respondent NO. 2

**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. 1377 of 2018

Khial MuhammadAppellant

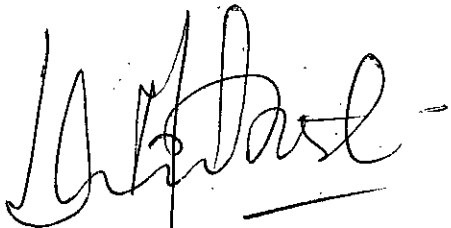
VERSUS

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

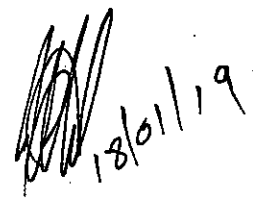
AFFIDAVIT

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**

Register of Letters Despatched



رجسٹر ڈاک روانگی

Serial NO.	Month & Date	Name and Address	Place	Subject	File NO.	Stamps Received		Stamps Used		Stamps Balanced		Remarks
						Rs.	Ps.	Rs.	Ps.	Rs.	Ps.	
3187-9	11/9/06	All concerned, Head master G.M.S. Budge		Migration Notification								
3192		Director, (EUSE) Peshawar		Application for annual increments of W/O								
3193		Taroon Khan P.S.T.		Trained Period of Service								
3194-96	10/9	Slc HM G.H.S. Battagram										
		DAO, Battagram										
		Official concerned										
3197-99		All concerned		Grant of Cf Fund Adm. Sander								
319	3200	DAO Battagram		Stoppage of Pay.								
3201	11/9/06	Head master G.M.S. Budge		Migration								
3202												

AI. 8

Annex. A2. 9

July, 2008

Su	Mo	Tu	We	Th	Fr	Sa
29	30	1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31	1	2
3	4	5	6	7	8	9

BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD

W.P No. 818 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: 3257
29.05.16

CA

22/05/16

Certified to be True Copy
 Excise
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Section 75 Act
 27/12/16

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 19.09.2016	3 WP No.819-A/2016 Present: Mr. Abdul Saboor Khan, Advocate, for the petitioners. **** Comments of respondent No.3 be called for so as to reach this Court within a fortnight. <i>Self Judge,</i> <i>Self Judge,</i>

Certified to be true Copy

EXCISE
Peshawar High Court
Abbottabad Bench
Appointed Under Section 5 Acts Ordinance

27/10/16

/MSA/

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

No. 2319 /Dated Allai the 40/10 /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)


Sub-Divisional Education Officer
(Male) Allai.

Annex

C. (14)

P. (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 ASDFO circle, statement of Ex ASDFO 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 on 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: (15)

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.

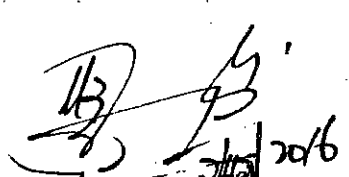
1-As per School record & statements of School staff the person namely Sarfraz Khan has not attended the said School neither he has taken over his charge as PST in the School. No activation of pay was made by the DDO. Hence his appointment order/Service Book/Source I and II not found in the School and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

2-And as per statement of concerned ASDED, one Mr. Khyal Muhammad S/o Faad have neither submitted his arrival report of charge to this office and 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.

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

11/01/2019

لفظی کی جانی ہے کہ GPS لفظی سرٹیفکیٹ (GPS Laghari Sar Naseem) کے سرٹیفکیٹ کے رپورٹ اور سرٹیفکیٹ کے مطابق اس سکول لفظی (GPS Laghari Sar Naseem) میں خیال محمد نامی کوئی مدرس کبھی بھی نہیں رہا ہے اور نہ اب ہے۔ مذکورہ شخص نے اس سکول میں نہ جارج کیا ہے اور نہ ہی اس سکول میں ڈیوٹی سرانجام دی ہے۔ میں نے بذاتِ خود مذکورہ سکول کا ریکارڈ چیک کیا جس میں مذکورہ شخص کا کوئی تذکرہ یا اندراج نہیں پایا گیا۔


ASDEO, Divisional
Edu: Officer (M)
Allai

السعد
عزیز اللہ
ASDEO (M)
Allai

شناختی کارڈ نمبر: 13201-3934309-7
موبائل نمبر: 03469606765

نوٹ: اس سرٹیفکیٹ کے ساتھ جملہ سکول ریکارڈ (رجسٹر، معائنہ اور لائسنس) کی فوٹو کاپیاں اور سرٹیفکیٹ کے سرٹیفکیٹ منسلک ہیں۔

تقدیر یوقی جاتی بہلہ میں زینت کی حثیت سے

GPS لٹریچر فریم کا جلم لیکارڈ چیک کیا اور لیکارڈ میں

ضیال ٹرنام کے مدرس کا کوئی ریکارڈ موجود نہیں ہے۔

اور نہ ہی اس کا نام حافی معلمین رجسٹر اور نہ ہی

اگ بک رجسٹر میں اس کا تذکرہ ہے۔ جس سے میں

اس نتیجے پر پہنچا ہوں کہ ضیال ٹرنام کے مدرس نے نہ

سکول غذا میں خارج کیا ہے اور نہ ہی ڈیوٹی سر انجام دی ہے۔

سکول غذا میں اس کا کوئی ریکارڈ موجود نہیں۔

نیز رجسٹر حافی معلمین اور رجسٹر اگ بک کے نوٹو کا یہاں

تقدیر یوقی رپورٹ کے ساتھ منسلک ہے۔

Handwritten signature

P.S.H.T
GPS Sar Nasim Allal

نام : محمد حسن =

عہدہ - P.S.H.T = مدرس GPS لٹریچر فریم کے انسپکٹر کا۔

شناختی نمبر ڈنر ۵-۱۸۲۰۱۹۹-۱۳۲۰۱ = H03463055240

Annex. E. (18)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

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



No. 17193-17209

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

P-23

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).

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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).

- 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- II/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 (F) 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

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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

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Endstt: No: _____

-sd-
District Education Officer (Male)
Battagram

Dated: ___/10/2016.

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

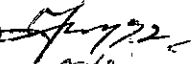
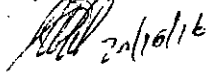



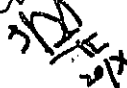
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Certificate

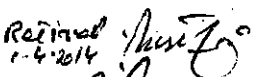





It is to certify that we the following ASDEOs/Dealing Assistants of this Sub Division declared that we have not processed/maintained the service record i.e service books, charge report, source I and II etc in respect of the following persons who have drawn illegally amount from the Govt. treasury as 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.

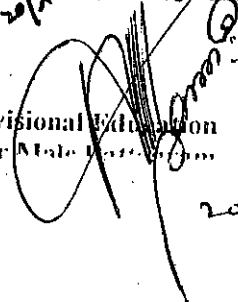
Signatures of ASDEOs

1. Muhammad Fayaz AS DEO 
2. Wali ur Rehman AS DEO 
3. Gul Rahman AS DEO 
4. Zahbi Ullah AS DEO 
5. Nisamatullah Suptd; 
6. Mohammad Zubair, Suptd; 

Signatures of Dealing Assistants

1. Mustafa TC Clerk  Retired 1-6-2014
2. Shahidin senior Clerk 
3. Shad Muhammad TC Clerk 
4. Ameer Muhammad JC 
5. Atta Ur Rahman JC 
6. Mohammad Afzal S.C. 

Sub Divisional Education
Officer Male District


20/10/2016

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DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA.

No. 3370 / P. No. 162 / Vol. 15 / Appeal of PST (M) General. Dated Peshawar the 21/11/2018.

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. Saifuraz 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

21/11/18

Encl. No. /

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

Deputy Director (I/ Sub) Elementary & Secondary Ed Khyber Pakhtunkhwa Peshawar

21/11/18

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

In Re;

Service Appeal No. 1377/2018



put up to the court with relevant appeal,

Khial Muhammad

VS

Director elementary and secondary education K-P and others

Reader

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. 1377/2018 please.

21/7/2020

Through

Applicant
[Signature]

(Mian Muhammad Imran)

Advocate