

SCANNED  
APPEAL  
PESHAWAR  
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. \_\_\_\_\_

SERVICE APPEAL NO.1466/2023

Dated \_\_\_\_\_

Bakhtawar Shah

V/S

LG & RD Department

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THROUGH:

APPELLANT



(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT  
03339390916

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

**SERVICE APPEAL NO.1466/2023**

Mr. Bakhtawar Shah, Village Secretary, (BPS-09),  
Village Council, Tatara Sub Division, Jamrud Khyber.

**(APPELLANT)**

**VERSUS**

1. The Secretary Local Government & Rural Development Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Director General, Local Government & Rural Development Department, Khyber Pakhtunkhwa, Peshawar.
3. The Assistant Director, Local Government & Rural Development Department, District Khyber, Khyber House Peshawar.
4. The Secretary Finance Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

**(RESPONDENTS)**

**APPLICATION FOR PLACING ON FILE PAY ROLLS ATTACHED  
WITH APPLICATION IN THE INSTANT APPEAL FOR PERUSAL  
OF THIS HONORABLE SERVICE TRIBUNAL.**

**RESPECTFULLY SHEWETH:**

1. That the appellant has filed the instant appeal in this Honorable Service Tribunal against the impugned action of the respondents of not counting previous service of the appellant rendered as Lower Division Clerk (BPS-07) and Upper Division Clerk (BPS-9) in Pakistan Ordinance Factory w.e.f 27.03.2015 till 14.12.2021 i.e the date on which he joined the Local Government & Rural Development Department as Village/Neighborhood Secretary for pay protection along with arrears and the next fixed in the instant appeal is 30.08.2023.

2. That the appeal of the appellant was fixed on 18.07.2023 for preliminary hearing and during preliminary arguments it was observed it pay roll of the appellant while serving as UDC in POF is necessary for fair conclusion of the case, therefore, the counsel of the appellant sought adjournment to complete/provide the documents of pay roll of the appellant while serving as UDC in POF and now the appellant wants to place pay rolls on file attached with this application in the instant appeal for perusal of this Honorable Service Tribunal. **(Copy of pay rolls are attached as Annexure-R)**

It is therefore most humbly prayed that on the acceptance of this application, the pay rolls attached with the instant application may kindly be considered as integral part of the appeal and may also be perused by the Honorable Service Tribunal for fair conclusion of the case of the appellant.



APPELLANT  
Baktawar Shah

THROUGH:



TAIMUR ALI KHAN  
ADVOCATE HIGH COURT

**AFFIDAVIT**

It is hereby solemnly affirmed and declare that the contents of the application are true and correct and nothing has been concealed from this Honorable Tribunal to the best of my knowledge and belief.



DEPONENT



K (3)

P-1666 PAKISTAN ORDNANCE FACTORIES  
 FY-CODE: 27 PAY-SLIP (C. E. E FY) FOR 10/2018 PAY-CODE: 051/1  
 BAKHTAWAR SHAH (032)L. D. C PL-NO: 68130 BPS: 07  
 BANK: OS-MBL, WAH CANTT H-NO: 860019 F-NO:  
 PREV-READING: PRES-READING: UNITS-CONSUMED:  
 CREDITS=====AC-NO: 01707901399403=====DEBITS

001-PAY	14650.00	101-RENT	753.00
005-COMV ALLNCE	1932.00	102-GP FUND	1010.00
006-HR ALLNCE	2384.00	115-B. F/A. D. B FUND	336.00
021-MEDICAL ALLNCE	1500.00	120-ELECT CHARGES	250.00
4.7-ADHOC-2016	1177.00	128-WATER CHARGES	5.00
5.1-SPECIAL PDF ALLNCE	2943.00	129-CONSER CHARGES	1.00
5.2-PM PAY	1020.00	208-DAMS DONATION	473.00
5.3-ADHOC-2017	1465.00		
5.6-ADHOC-2018	1465.00		

TOTAL CREDIT	28536.00	TOTAL DEBIT	2828.00
ADV-AMT	INTEREST	TOTAL	NET-PAY: 25708.00
			RECOVERED 0/S-ADV-BAL
D/BAL (1/6/2017)	TOTAL-SUBS	TOTAL-REF	TOTAL-ADV
20745.00	15994.00	0.00	0
			C/BALANCE 36739.00

P-1675 PAKISTAN ORDNANCE FACTORIES  
 FY-CODE: 27 PAY-SLIP (C. E. E FY) FOR 09/2018 PAY-CODE: 051/1  
 BAKHTAWAR SHAH (032)L. D. C PL-NO: 68130 BPS: 07  
 BANK: OS-MBL, WAH CANTT H-NO: 860019 F-NO:  
 PREV-READING: PRES-READING: UNITS-CONSUMED:  
 CREDITS=====AC-NO: 01707901399403=====DEBITS

001-PAY	14650.00	101-RENT	753.00
005-COMV ALLNCE	1932.00	102-GP FUND	1010.00
006-HR ALLNCE	2384.00	115-B. F/A. D. B FUND	336.00
021-MEDICAL ALLNCE	1500.00	120-ELECT CHARGES	250.00
4.7-ADHOC-2016	1177.00	128-WATER CHARGES	5.00
5.1-SPECIAL PDF ALLNCE	2943.00	129-CONSER CHARGES	1.00
5.2-PM PAY	1020.00		
5.3-ADHOC-2017	1465.00		
5.6-ADHOC-2018	1465.00		

TOTAL CREDIT	28536.00	TOTAL DEBIT	2355.00
ADV-AMT	INTEREST	TOTAL	NET-PAY: 26181.00
			RECOVERED 0/S-ADV-BAL
D/BAL (1/6/2017)	TOTAL-SUBS	TOTAL-REF	TOTAL-ADV
20745.00	14984.00	0.00	0
			C/BALANCE 35729.00

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PAKISTAN ORDNANCE FACTORIES

FY-CODE: 29 PAY-SLIP (C. E. E FY) FOR 04/2019 PAY-CODE: 051/1  
 BAKHTAWAR SHAH (089)U. D. C PL-NO: 68130 BPS: 09  
 BANK: 05-HBL, WAH CANTT H-NO: 860019 F-NO:  
 PREV-READING: PRES-READING: UNITS-CONSUMED:  
 CREDITS=====AC-NO: 01707901399403=====DEBITS

001-PAY	16150.00	101-RENT	895.00
005-CONV ALLNCE	1932.00	102-GP FUND	1010.00
006-MR ALLNCE	2579.00	115-B. F/A. G. B FUND	384.00
021-MEDICAL ALLNCE	1500.00	120-ELECT CHARGES	300.00
4.7-ADHOC-2016	1177.00	128-WATER CHARGES	5.00
5.1-SPECIAL PDF ALLNCE	2943.00	129-CONSER CHARGES	1.00
5.2-PH PAY	1020.00		
5.3-ADHOC-2017	1615.00		
6.6-ADHOC-2018	1615.00		

TOTAL CREDIT 30531.00 TOTAL DEBIT 2995.00

ADV-AMT INTEREST TOTAL NET-PAY: 27936.00  
 RECOVERED O/S-ADV-BAL

OBAL(01/06/18) TOTAL-SUBS TOTAL-REF TOTAL-ADV C/BAL  
 35875.00 10100.00 0.00 - 45975.00

P-1649 PAKISTAN ORDNANCE FACTORIES  
 FY-CODE: 27 PAY-SLIP (C. E. E FY) FOR 03/2017 PAY-CODE: 051/1  
 BAKHTAWAR SHAH (089)U. D. C PL-NO: 68130 BPS: 09  
 BANK: 05-HBL, WAH CANTT H-NO: 860019 F-NO:  
 PREV-READING: PRES-READING: UNITS-CONSUMED:  
 CREDITS=====AC-NO: 01707901399403=====DEBITS

001-PAY	16150.00	101-RENT	895.00
005-CONV ALLNCE	1932.00	102-GP FUND	1010.00
006-MR ALLNCE	2579.00	115-B. F/A. G. B FUND	384.00
021-MEDICAL ALLNCE	1500.00	120-ELECT CHARGES	300.00
4.7-ADHOC-2016	1177.00	128-WATER CHARGES	5.00
5.1-SPECIAL PDF ALLNCE	2943.00	129-CONSER CHARGES	1.00
5.2-PH PAY	1020.00	155-REC CONV ALLNCE	125.00
5.3-ADHOC-2017	1615.00		
6.6-ADHOC-2018	1615.00		
758-A/D DIFF OF PAY	9450.00		

TOTAL CREDIT 39981.00 TOTAL DEBIT 2720.00

ADV-AMT INTEREST TOTAL NET-PAY: 37261.00  
 RECOVERED O/S-ADV-BAL

OBAL(01/06/18) TOTAL-SUBS TOTAL-REF TOTAL-ADV C/BAL  
 35875.00 9090.00 0.00 - 44965.00

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**Dist. Govt. KP-Provincial**  
**District Accounts Office khyber**  
**Monthly Salary Statement (June-2023)**



**Personal Information of Mr BAKHTAWAR SHAH d/w/s of ABDUL QADOOS KHAN**

Personnel Number: 00989888 CNIC: 2120451844771 NTN:  
Date of Birth: 12.03.1992 Entry into Govt. Service: 14.11.2021 Length of Service: 01 Years 07 Months 018 Days

**Employment Category: Active Temporary**

Designation: VILLAGE SECRETARY 80926119-DISTRICT GOVERNMENT KHYBE  
DDO Code: KH6007-AD LG & RD Khyber  
Payroll Section: 001 GPF Section: 001 Cash Center:  
GPF A/C No: GPF Interest Free GPF Balance: 22,496.00 (provisional)  
Vendor Number: -  
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 09 Pay Stage: 1

Wage type		Amount	Wage type		Amount
0001	Basic Pay	18,560.00	1001	House Rent Allowance 45%	2,579.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	1,000.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	1,765.00	2347	Adhoc Rel Al 15% 22(PS17)	1,766.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3009	GPF Subscription	-1,700.00	3501	Benevolent Fund	-1,200.00
4004	R. Benefits & Death Comp:	-450.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
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**Deductions - Income Tax**

Payable: 0.00 Recovered till JUN-2023: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 32,602.00 Deductions: (Rs.): -3,350.00 Net Pay: (Rs.): 29,252.00

Payee Name: BAKHTAWAR SHAH  
Account Number: 2007814456  
Bank Details: THE BANK OF KHYBER, 080066 Warsak Road Peshawar Warsak Road Peshawar, Peshawar

Leaves: Opening Balance: Aailed: Earned: Balance:

**Permanent Address:**

City: DISSTT. JAMROD L Domicile: - Housing Status: No Official  
Temp. Address:  
City: Email: bakhtawarshah681304@gmail.com

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