#### YBER PAK<u>HTUNKHWA SERVICE</u> **BEFORE** TRIBUNAL PESHAWAR.

S.A No.<u>1584</u>/ 2022

Khyber

Distry

Service Tei

Kainat Ashraf

# <u>VERSUS</u>

# Director Local Fund Audit etc

Service Appeal

S.No.	Descriptions	Annex:	Pages		
			From	То	
1	Para wise comment				
2	Affidavit				
3	Copy of Advertisement	A	1	2	
4	<i>Copy of</i> Recommendation & Appointment Order	B, C	3	7	
5	Copy of inter-se- seniority	D	8	11	
6	Copy of Final seniority list of 2021	E	12	15	
7	Copy of objection regarding seniority	F	16	23	
8	Copy of request for issuance of inter-se- seniority list	G	24	27	
9	Copy of minutes/ Decision of Committee	H	28	33	
10	Power of Attorney & Wakalat Nama		34	37	
				T T	

Through Attorney

Respondents\_

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

S.A No.1584/ 2022

Kainat Ashraf

#### **VERSUS**

Director Local Fund Audit etc

# PARA WISE COMMENTS ON BEHALF OF THE RESPONDENTS NO. 3 TO 5,7 to 10,12,13,15 to 25, 27 to 31.

**Respectfully Sheweth:** 

13

#### **PRELIMINARY OBJECTION:**

- 1. That the Appellant has got no cause of action, Locus Standi to file the instant appeal.
- 2. The appellant has not come to the Tribunal with clean hands.
- 3. That appellant has concealed the material facts from this Honorable Tribunal while filing the instant appeal.
- 4. The appeal of appellant is bad in eye of law being infructuous.
- 5. The appellant raised frivolous and illegal demand in the instant appeal.
- 6. That the appellant is estopped by his own conduct to file the instant appeal.
- 7. That appeal of the appellant is bad in its present form due to miss-joinder and nonjoinder of necessary parties.
- 8. That under the prevailing Rules and Regulation, the instant appeal is neither competent nor maintainable.
- 9. That no vested rights or accrued rights of the appellant have been infringed to warrant interference.

#### PARA WISE COMMENTS

 That 1<sup>st</sup> clause of para 1 is incorrect, the Directorate of Local Fund Audit Department Khyber Pakhtunkhwa Advertised (63) posts of Auditors BPS-14 through Khyber Pakhtunkhwa Public Service Commission vide Advertisement No 03/2018 dated 09-02-2018, 2<sup>nd</sup> clause of para 1 is admitted as correct.(copy is annexure A) 2. That Para No 2 is denied due to want of knowledge.

3. That Para No 3 is matter of record.

4. That Para 4 of the instant appeal is also matter of record.

5. That Para No 5 relates to record.

6. That Para No 6 is incorrect because the appellant is stating wrong fact in this para. Hence, in response to para No. 6 it is submitted that the Respondents No.3 to 31 were recommended vide letter No PSC/SR-III/001442 dated 22-1-2020 and appointed vide letter No. LFA/Estt;/ Recruitment/2019/1154-1207 dated 29/5/2020. (Copies are as annexure B & C).

- 7. That in regard para No. 7, it is contented that the recruitment process under advertisement No. 03/2018 was under process at Khyber Pakhtunkhwa Public Service Commission and final recommendations in the said advertisement was issued by Khyber Pakhtunkhwa Public Service Commission on dated 22/01/2020 hence, the appellant cannot claim any seniority before finalization of all the process and formalities before the ending of process of appointments of the eligible candidates under the same advertisement. The seniority list between the employees can only be possible and be considered as complete, when the entire process/procedure and formalities for the appointment is finalize by the commission / authority, after the advertisement.
- 8. That para No 8 is incorrect, hence denied. The KPPSC inter se seniority list was conveyed to the Department on dated 10-1-2022 and vide letter No PSC/SR-III/023984 dated 04-04-2022 and in light of the above mention seniority list, the final seniority list of the Auditors BPS-14/15 was issued by Directorate of Local Fund Audit for the year 2021.( copies are as annexure D & E )

9. Para No. 9 is also incorrect, hence denied.

10. That Para No. 10 is incorrect, Respondents No 1 and 2 had considered and processed the said application / objection of appellant for seeking detail from the relevant authorities i-e Khyber Pakhtunkhwa Public Service Commission. It is also pertinent to mention here that Khyber Pakhtunkhwa Public Service Commission under rule 17(1) (a) of ESTA Code issued an inter-se-merit / seniority list as per law and the same was conveyed by the KPPSC to respondent No 2 and then respondent No 1. After receiving of inter-se-seniority list from the concerned authority, committee was constituted by Director of Local Fund Audit Khyber Pakhtunkhwa, the committee was comprising of four members and given their finding that the department has no domain to make changes in the order of seniority assigned on merit by the Commission being mandate of the Public Service Commission. The law is very much clear regarding the selection/ recommendation/promotion/ transfer of the civil servant and no person or authority is authorized to bypass the relevant laws and regulations / procedure as provided. The department can only issue the authentic and final seniority list after receiving the inter-se-seniority list from the Commission (KPPSC) and the same be consider as final. (copies are as annexure F, G & H)

- 11. In reply of para No 11, that the final seniority list by respondent No 1 vide notification No LFA/ESTT;/S.L/2020/1226-1332 dated 22-04-2022 is correctly issued by following the merit base inter-se-seniority list issued by the KPPSC. The objection of appellant over the said seniority list is wage and baseless, hence the instant appeal of appellant is liable to be dismissed with heavy cost.
- 12. That Para No 12 is denied. Detail reply is given supra paras.
- 13. That Para No 13 is denied, in reply of para 13 stated that the respondent No. 1 had rightly rejected objection / application of appellant. After receiving of merit wise inter-se-seniority list from the concerned authority i-e KPPSC, committee was constituted by Director of Local Fund Audit Khyber Pakhtunkhwa, the committee was comprising of four members and given their finding that the department has no domain to make changes in the order of seniority assigned on merit by the Commission being mandate of the Public Service Commission.

14. Para No 14 is incorrect, the appeal of appellant is liable to be dismissed because the same is against the relevant laws/ rules/ regulations.

#### **ON GROUNDS:**

A. Incorrect, the impugned seniority list has been issued as per law and rule on the subject and as such neither violation nor any irregularity has been committed by the respondent No 1 at the time of issuing final seniority list.

- B. Incorrect, misleading and misstated the respondents had followed the proper seniority procedure provided by law and rules.
- C. Incorrect, as stated above is misleading, inter-se-seniority list has been conveyed by the commission thereafter the respondent No 1 purely on merit wise and as per law and rules issued final seniority list and it is worth to mention here that both the petitioner and the private respondents have been appointed through same advertisement.

D. Incorrect, para 7 of the petition, appellant self-admitted that the replying respondents was not appointed at the time of issuing the list of 2019, after the recommendation and appointment the Khyber Pakhtunkhwa Public Service Commission conveyed merit wise inter-se-seniority list to the department thereafter the department as per law and rules issued final seniority list and all employees equally treated according to the Constitution/ law/ rules.

- E. Incorrect, no violation of law and rules has been committed by respondent No 1 and correctly issued final seniority list of 2021. The appellant cannot claimed any seniority before finalization of all the process and appointment of eligible candidates under the same advertisement.
- F. Incorrect, no constitution violation has been committed and all course of action has been taken in accordance with law/rules/ regulations. The law is very much clear regarding the selection/ appointment / recommendation / promotion /transfer of the civil servant and no person or authority is authorized to bypass the relevant law and procedure provided.

- G. That no vested rights or accrued rights of the appellant have been infringed to warrant interference. As per law and rules all employees are equally treated by respondent No 1 at the time of issuing final seniority list of 2021.
- H. Denied due to want of knowledge. However Khyber Pakhtunkhwa Public Service Commission is not limited to only recruitment. As per Khyber Pakhtunkhwa Public Service Commission Regulation 2017, the commission is bound to convey recommendation of eligible candidate along with merit wise inter-se-seniority list to the department.
- I. Incorrect, allegation of appellant is baseless, raised frivolous and illegal demand in the instant appeal.
- J. No comment.

(That other legal and factual grounds may be raised at the time of argument with the permission of Honorable Tribunal)

#### <u>PRAYER</u>

In the circumstances above, it is therefore, most humbly prayed that the appeal / petition of the appellant is devoid of merit and legal footings may kindly be dismissed with cost.

Respondents

Through Attorney

Through Counsel\_\_\_\_\_

Dis Mt Courts Mardan Muhammad Hayyan Advocate High Court at District Courts Mardan.

#### Books for Reference

- 1. Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules 1989.
- 2. Civil Servant (Seniority) Rules 1993.
- 3. Khyber Pakhtunkhwa Public Service Commission Regulation 2017.
- 4. Other Relevant Books and Case Law

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

S.A No.1584/ 2022

#### Kainat Ashraf

#### VERSUS

#### Director Local Fund Audit etc

#### Service Appeal

#### <u>AFFIDAVIT</u>

I, Shahid Ahmad S/o Salar Ahmad R/o Jhandai Tehsil and District Mardan do hereby solemnly affirm and declare on oath that the contents of para wise comments on behalf of Respondent 03 to 31 are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honorable Tribunal.

DEPONENT It is fuither stated on oath ingt in This appeal, The answerity respondents have neither been place en-parte nor their defense has been Struck off. Identified by

District Courts Muhammad Hayyah Addvocate High Court at District Courts Mardan.



#### KHYBER PAKHTUNKHWAV PUBLIC SERVICE COMMISSION

<u>2- For hawar Cantt:</u> Website: www.kppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: 09.02.2018

tinnex

# Advertisement No. 03/2018

Online applications are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by 26.02.2018.

Apply Online Only. Applications other than online will not be accepted. To apply, visit any Jazz Cash/ Easy Paisa Agent, deposit application fee of RS.285/- excluding service charges and get transaction I.D through SMS. Visit PSC website <u>www.kppsc.gov.pk</u> and apply online. The candidates are advised to fill all the columns carefully no change will be allowed later on. Unclaimed gualification, experience etc will not be accepted.

Note: Documents are not required at the time of submission of application; candidates who qualified the test will have to submit their documents within a week time after announcement of the result.

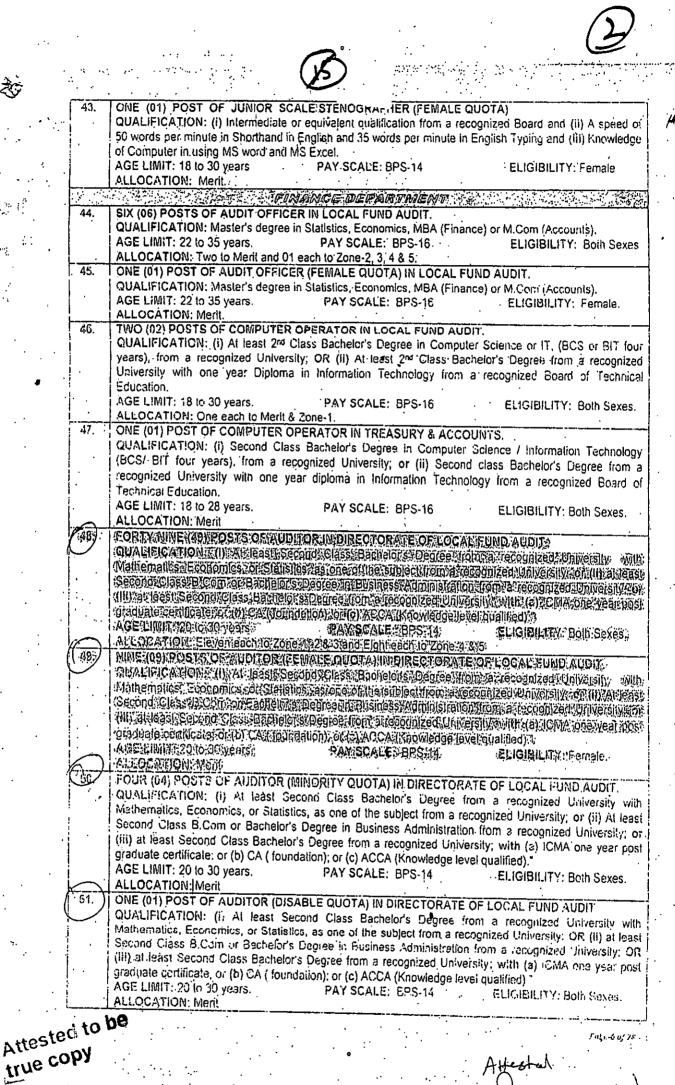
	ADMINISTRATION DEPARTMENT
	TWO (02) POSTS OF PROTOCOL OFFICER.
	QUALIFICATION: (i) Master's Degree in Political Science / History / International Relations / Literature
	(English / Urdu) / Journalism OR Bachelor's Degree with LLB, from a recognized University; and (ii) Three
ł	years experience in Journalism / Publicity in a Government office / News Agency / Newspaper.
	AGE LIMIT: 21 to 35 years PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes
ł	ALLOCATION: One each to Merit & Zone-1.
	AGRICULTURE, LIVESTOCK & COOPERATIVE DEPARTMENT
2	TWO (02) POSTS OF SENIOR RESEARCH OFFICER / SENIOR BIOCHEMIST IN LIVESTOCK & DAIRY
	DEVELOPMENT (RESEARCH WING)
	QUALIFICATION: (a) Ph.D in Veterinary / Animal Sciences / Bio chemistry, after basic degree of D.V.M o
	equivalent qualification recognized by PVMC, OR (b) M.Sc (Hons) / M.Phil / M.S in Veterinary / Anima
	Sciences / Bio chemistry, after basic degree of DVM or equivalent gualification recognized by PVM
	having two years Research Experience with at least two Research Publication. OR (c) Doctor of Veterinar
	Making two years research experience with a feast two research represention. Or (c) bootor of veterinary file years
	experience in the relevant field (Research) with at least two Research Publication.
	AGE LIMIT: 28 to 45 years. PAY SCALE: BPS-18. ELIGIBILITY: Both Sexes.
	ALLOCATION: Merit
3.	FOUR (04) POSTS OF RESEARCH OFFICER / FARM MANAGER IN LIVESTOCK & DAIR
	DEVELOPMENT (RESEARCH WING)
	QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Science
	recognized by PVMC.
	AGE LIMIT: 22 to 32 years. PAY SCALE: BPS+17, ELIGIBILITY: Both Sexes
	ALLOCATION: One each to Merit, Zone-1, 4 & 5
4.	ONE (01) (LEFTOVER) POST OF RESEARCH OFFICER / FARM MANAGER (MINORITY QUOTA)
••	LIVESTOCK & DAIRY DEVELOPMENT (RESEARCH WING).
	QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Science
	recognized by PVMC.
	AGE LIMIT: 22 to 32 years. PAY SCALE: BPS-17. ELIGIBILITY: Both Sexes
	ALLOCATION: Merit
5.	ONE (01) POST OF AUDIO VIDEO PRODUCER IN AGRICULTURE RESEARCH WING.
	QUALIFICATION: At least 2 <sup>nd</sup> Class Master's Degree in Journalism or Mass Communication or B.Sc (fc
	years) or equivalent qualification from a recognized University with two years Experience in the relevant field
	AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17. ELIGIBILITY: Both Sexes
	ALLOCATION: Merit
6	ONE (01) POST OF STATISTICAL OFFICER IN AGRICULTURE RESEARCH WING
•	QUALIFICATION: M.Sc in Statistics or M.A/M:Sc in Economics or Maths with Statistics as a compulso
	subject In B.A / B.Sc from a recognized University.
5	
•	
•	AGE LIMIT: 22 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes

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Multan Mad Hayyen Advocate High Court Pistrict Courts Mardan

Attestal



Muha nrMad Hayyan Advocate High Court District Courts Mardan 1. ons : 091-9213551 Fax : 091-9211795 Websitel : <u>www.kppsc.gov.pk</u>

KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION 2-Fort Road, Peshawar Cantt.

No. PSC/SR-III/ 00144/2 Dated: 27/1/2000

The Secretary to Govt: of Khyber Pakhtunkhwa, Directorate of Local Fund Audit (Finance Department). Peshawar.

Subject:

Dear Sir,

To.

#### RECRUITMENT TO FORTY NINE (49) POSTS OF AUDITOR (BPS-14) IN DIRECTORATE OF LOCAL FUND AUDIT. (FINANCE DEPARTMENT). (ADVT: NO. 03/2018, S. NO. 48).

In continuation this office letter No.PSC/SR-V11/00071314 dated 13-01-2020, on the subject noted above and to state that the Commission provisionally recommends candidate Mr. Zaheer Ahmad s/o Aurangzeb of Abbottabad/5 to the Government for appointment against 5<sup>th</sup> vacancy of 6<sup>th</sup> Block.

2 Original application(with enclosures) of the above recommendee is enclosed herewith for your record.

3. Kindly acknowledge receipt.

4.

Upto date zonal state will be as under:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total
27	27	26	20	20	120
27	27	26	20	20	120
ļ				-	Nil
	Zone-1 27 27	Zone-1 Zone-2   27 27   27 27	Zone-1 Zone-2 Zone-3   27 27 26   27 27 26	Zone-1 Zone-2 Zone-3 Zone-4   27 27 26 20   27 27 26 20	Zone-1 Zone-2 Zone-3 Zone-4 Zone-5   27 27 26 20 20   27 27 26 20 20

5.

Inter-Se-Merit is as under:

Inter-S	e-Merit No.	Name with Father's Name	Domicile
	<u> </u>	Abdur Rehman S/O Sharif Gul	Nowshera / 2
···	2.	Ghufran Ullah S/O Mughal Mir	Karak / 4
	3.	Sikandar Shah S/O Karim Shah	Mardan / 2
	4.	Abdul Latif S/O Adam Khan	Mardan / 2
	5,	Hamid Faisal S/O Abdul Razid Khan	Karak / 4
	<u> </u>	Farooq Zaman S/Q Lal Zaman	Nowshera / 2
!		Numan Ali Shah S/O Fayyaz Ali Shah	Bannu / 4.
	8.	Shahid Ahmad S/O Salar Ahmad	Mardan / 2
	9.	Mian Ata Ur Rehman Khan S/O Mian Saif Ur Rahman	Nowshera / 2
	10.	liaz III Hag S/O Saeed UI Hag	Peshawar / 2
- <del>0</del>	11.	Hekmat Ullah S/O Muhammad Ismail Khan	FR Bannu / 1
<u>''/</u>	12.	Naeem Ahmed S/O Abdur Rahim	Haripur / 5
	13.	Ikram Ullah S/O Abdullah	Peshawar/2
	14.	Muhammad Azam Khan S/O Muhammad Faroog Khan	Bannu / 4
<u>}μ_</u>	15.	Sikander All S/O Syed Sher Shah	DI Khan / 4
	16.	Hamshid Khan S/O Gulsher	Mardan / 2
	17,	Sohail Muhammad S/O Gul Muhammad	Mardan / 2
	18.	Naveed Ahmad Khan S/O Rast Baz Khan	Bannu / 4
	19.	Joher Zaman Abbasi S/O Badi Uz Zaman Khan Abbasi	Abbottabad / 5
	20.	Anees Ur Rehman S/O Bashir Ahmad	Karak / 4
	20.	Kashil Shakeel S/O Muhammad Naseeb Khan	Bannu / 4
	21.	Yousaf Khan S/O Amir Saed	Peshawar/2
~ ·	22.	Muhammad Shoaib S/O Muhammad Zahoor	Abbotlabad / !
	23.	Usman Ullah S/O Muhammad Rashid	Chitral / 3

Muhammad Hayyan Advocate High Court Pistrict Courts Mardan

Attested to

1708 West

	Zaheer Ahmed S/Q Aurang Zeb •	Abbottabad / 5
25.		Mansehra / 5
28.	Khuram Saqib S/O Muhammad Saqib	Haripur / 5
27.	Syed Imran Ali Shah S/O Syed Shahnawaz Hussain Shah	Abbottabad / 5
28.	Rozee D/O Muhammad	· · · · · · · · · · · · · · · · · · ·
	Shamraiz	Dir Lower / 3
29.	Faryal Zaman D/O Mir Zaman	Mohmand
30.	Imilaz Ahmad S/O Noor Khan	Agency/1
31.	Bilal Nawaz S/O Muhammad Nawaz	Mansehra / 5
32.	Ismat Ullah Jan S/O Hukam Khan	Bajaur Agy / 1
	Fawad Khan S/O Abid Ur Rehman	N.W. Agency / 1
33.	Sarwar Azeem S/O Amir Azim Khan	Chitral / 3
34		Bajaur Agy / 1
35.	Fawad Khan S/O Faqir Mohammad	Dir Lower/ 3
36.	Muhammad Rashad S/O Fazli Subhan	Mohmand
. 37.	Asad Ali S/O Mumtaz Khan	Agency/1
	Hassan Wazir S/O Pinda Khan	FR Bannu / 1
38.	Shahzeb Khan S/O Gul Badshah	Mohmánd / 1
39.	Mohammad Faroog S/O Mazo Ullah Khan	Mohmand Agency / 1
40.		Chitral / 3
41.	Fida Ali S/O Mauli Khan	Dir Lower/ 3
42.	Rahat Ullah S/O Hameed Ullah	Swat / 3
43.	Lamiad Khan S/O Qubad Khan	Swat / 3
44.	Mansoor Ahmad S/O Shereen Muhammad	Chitral / 3
45.	Earidullah S/O Hidayat Ullah	Chitral / 3
45.	Sved Sadig Hussain S/O Dada Jan	Bajaur Agy / 1
47.	I Hameed I liah S/O Haider Khan	Dir Upper / 3
48	Adnan Khan S/O Hafiz Ur Rahman	Mohmand
40	Asad Ullah Khan S/O Mumtaz Khan	Agency / 1

Yours faithfully. (11)35 hah) Director Recruitment Date; \_

(Director Recruitment)

. . . . . .

ć.,

Endst: No. PSC/SR II Copy forwarded for information to:-

The Directorate of Local Fund Audit, Peshawar

Attested to be true copy

**6** 5



Advocate High Court District Courts Mardan





# DIRECTORATE OF LOCAL FUND AUDIT KILYBER PAKHTUNKIIWA, PESHAWAR NO.LFA/Estt:/Recruitment/2019/ 1/54-1207 Dated Peshawar the \_29 / 05 /2020

#### OFFER OF APPOINTMENT

. On the recommendations of Khyber NO.LFA/Estt:/Recruitment/2019/ Pakhtunkhwa Public Service Commission, the undersigned being the competent authority is pleased to offer appointment against the post of Auditor (BPS-14) in Directorate of Local Fund Audit, Khyber Pakhtunkhwa to the following persons on the term and conditions stated below:-

S.NO	NAME WITH FATHER NAMES	DOMICILE/ZONE
1	Abdur Rchman S/O Sharif Gul	Nowshera /2
2	Ghufran Ullah S/O Mughal Mir	Karak / 4
3	Sikandar Shah S/O Karim Shah	Mardan / 2
4	Abdul Latif S/O Adam Khan	Mardan / 2
5	Hamid Faisal S/O Abdul Razid Khan	Karak / 4
6	Farooq Zaman S/O Lal Zaman	Nowshera /2
7	Nouman Ali ShahS/O Fayyaz Ali Shah	Bannu / 4
8	Shahid Ahmad S/O Salar Ahmad	Mardan / 2
9	Mian Ata Ur Rahman Khan S/O Mian Saif Ur Rehman	Nowshera /2
10	Ijaz UI Haq S/O Saeed UI Haq	Peshawar / 2
11	Hekmat Ullah S/O Muhammad Ismail Khan	FR Bannu / 1
12	Naeem Ahmad S/O Abdur Rahim	Hari Pur / 5
13	Ikram Ullah S/O Abdullah	Peshawar / 2
14	Muhammad Azam Khan S/O Muhammad Farooq Khan	Bannu / 4
15	Sikander Ali S/O Syed Sher Shah	D-I Khan / 4
16	Hamshid Khan S/O Gulsher	Mardan / 2
17	Sohail Muhammad S/O Gul Muhammad	Mardan / 2
18	Naveed Ahmad Khan S/O Rast Baz Khan	Bannu / 4
19	Joher Zaman Abbasi S/O Badi Uz Zaman Khan Abbasi	Abbottabad / 5
20	Anees Ur Rehman S/O Bashir Ahmad	Karak / 4
21	Kashif Shakeel S/O Muhammad Naseeb Khan	Bannu / 4
22	Yousaf Khan S/O Amir Said	Peshawar / 2
23	Muhammad Shoaib S/O Muhammad Zahoor	Abbottabad / 5
24	Usman Ullah S/O Muhammad Rashid	Chitral / 3
25	Zaheer Ahmad S/O Aurang Zeb	Abbottabad / 5
26	Khuram Snoih S/O Muhammad Sagib	Mansehra / 5
27	Sved Imran Ali Shah S/O Syed Shah Nawaz Hussain Shah	Hari Pur / S
28	Rozee D/O Muhammad Shamraiz	Abbottabad / 5
29	Faryal Zaman D/O Mir Zaman	Dir Lower/ 3
30	Imtiaz Ahmad S/O Noor Khan	Mohmand Agency / 1
31	Bilal Nawaz S/O Muhammad Nawaz	Mansehra / 5
32	Ismat Ullah Jan S/O Hukam Khan	Bajaur Agency / 1
33	Fawad Khan S/O Abid Ur Rehman	N/W Agency / 1
34	Sarwar Azeem S/O Amir Azim Khan	Chitral / 3
	Fawad Khan S/O Faqir Muhammad	Bajaur Agency / 1
35	Muhammad Rashad S/O Fazli Subhan	Dir Lower / 3
36	Asad Ali S/O Mumtaz Khan	Mohmand Agency /
37	Hassan Wazir S/O Painda Khan	FR Bannu / 1
38	Shahzeb Khan S/O Gul Badshah	Mohmand Agency /
39	Muhammad Faroog S/O Mazoullah Khan	Mohmand Agency /
40	Fida Ali S/O Mauli Khan	Chitral / 3
41	Rahat Ullah S/O Hameed Ullah	Dir Lower / 3
42	Amjad Khan S/O Qubad Khan	Swat / 3
43	Mansoor Ahmad S/O Shereen Muhaminad	Swat/3
44	Mansoor Annua S/O Sicielan Huah	Chitral / 3
45	Farid Ullah S/O Hidayat Ullah	Chitral/3
46	Syed Sadiq Hussoin S/O Dada Jan	

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48 Adnan Khan 3/0 19 Asad Ullah Khan S/O Mumtaz Khan	
	•

Term & conditions:-

- They will get pay at minimum of BPS-14 (15180-1170-50280) plus usual allowances as admissible under the rules. They will also be entitled to arinual increment as per
- They will be governed by the Khyber Pakhtunkhwa Civil Servants Act 1973 and all the laws applicable to the Civil Servants and Rules made there-under. ü.
- iii. They will, for all intents and purposes, be Civil Servants and entitled for pension, gratuity
- G.P Fund as per Government policy. iv. Their employment in Directorate of Local Fund Audit is purely temporary and their services are liable to be terminated without assigning any reason at fourteen (14) days notice or on payment of 14 days salary in lieu of the notice. In case they wish to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited/deposited in the Government Treasury.
- v. They will initially, be on probation for a period of one year.
- vi. They will produce medical certificate of fitness from Medical Superintendent, Police & Services Hospital, Peshawar before reporting for duly to this Directorate as required

vii. They will abide to observe all the rules/regulations related to the service matter.

- viii. They will have to join duty at their own expenses.
- Their services are transferable anywhere in Khyber Pakhtunkhwa.
- This appointment is subject to verification of their documents/ antecedents from the ix. х.
  - concerned authorities.

If they agree to accept the offer of appointment to the post with above conditions, they will report for duty to the undersigned within 14 days of the receipt of this offer and produce original certificates in connection with their qualification, domicile and age etc.

> - 2.00 ----DIRECTOR, LOCAL FUND AUDIT. KHYBER PAKHTUNKHWA. PESHAWAR

Endst; No & date even.

- Copy forwarded to: :
  - The Accountant General Khyber Pakhtunkhwa Peshawar.
  - The Section Officer (Estt-II) Finance Department Peshaiwar. 2.
  - The Medical Superintendent Police & Services Hospital, Peshawar. 3.
  - 4. The Budget Assistant (HQ).
  - Abdur Rehman S/O Sharif Gul, Mohallah Gulabad, Village Nizampur, District & Tehsil 5.
  - Ghufran Ullah S/O Mughal Mir, Village Dabli Lawagher, Post Office, Tehsil and District Karak 6.
  - Sikandar Shah S/O Karim Shah, Muhallah Mamootian Bakhshali , Tehsil and District Mardan. 7.
  - Abdul Latif S/O Adam Khan, Mohallah Sherya Khel Village and Post office Gujar Garhi Distr 8.
  - Hamid Faisal S/O Abdul Razid Khan, Village & Post Office Chokara Teshill Takht-e-Nasrati 9.
  - 10. Farooq Zaman S/O Lal Zaman, Mohallah, Batakzal new road village Kheshgi Bala PO Kheshgi
  - . Numan Ali Shah S/O Fayyaz Ali Shah, Kotka Abdul, Qadir Shah, Mandan Adda Mir Abbas khan Mandan Bannu.
  - 12. Shahid Ahmad S/O Salar Ahmad, Post Office Main Jhandi Bazar Railway Station Tehsil Takht
  - 13. Mian Ata Ur Rahman Khan S/O Mian Salf Ur Rehman Village Taro Jabba Mohallah Miangan
  - 14. Ijaz Ul Haq S/O Sneed Ul Haq Muslim Abad, Near Majid Kababi Hamza Masjid Nothia. Charkhana Road Backana Charkhana Road
  - 15. Hekmat Ullah S/O Muhammad Ismail Khan, Otin Khel P.O Qamar Killa Khandar Khun Khel Tehsil Domet District David
  - Nacem Ahmad S/O Abdur Rahim, House No.1081, Street No.2, Quresh Chowk, Sector No.1, Khalabat Townshin, Understanding, House No.1081, Street No.2, Quresh Chowk, Sector No.1.
  - Ikram Ullah S/O Abdullah, House No.2094, Mohällah Wahab abad near OHSS No.04, Ouldara Chowk Kakshal. Prebause Chowk Kakshal, Peshawar,

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Advocate High Court District Courts Mardan

- 18. Muhammad Azam Khan S/O Muhammad Farooq Khan Village Parez Khoni Khel P.O Nizam Bazar Surrani Bannu, Khyber Pakhtunkhwa.
- 19. Sikander Ali S/O Syed Sher Shah House No.3759. Street Allah Wasaya Numberdar, Mohallah
- 20. Hamshid Khan S/O Gul Sher, Katlang Road Kodinaka Killi Mardan.
- 21. Sohail Muhammad S/O Gul Muhammad Taj Mahal Plaza First Floor, Allied bank Limited Regional Headquarter Bank Road Mardan.
- 22. Naveed Ahmad Khan S/O Rast Baz Khan, G/O Noor Nawaz Zafar, Marwat House Moalla Bejli Ghar P/O Adamjee Paper Mills Amangarh District Nowshera.
- 23. Joher Zaman Abbasi S/O Badi Uz Zaman Khan Abbasi, House 744, Street 03, Sector 1-10/2,
- 24. Anees Ur Rehman S/O Bashir Ahmad Hassan House, House No.192/E Sector 6, Phase-I Near Neela Gumbad Masjid KDA Kohat
- 25. Kashif Shakeel S/O Muhammad Naseeb Khan Post Office Ghorivyala Tehsil & District Bannu,
- 26. Yousaf Khan S/O Amir Said, Outside Yakatoot, Zargarahad chowk Khalid Gul Plaza Baseer Shop Peshawar City
- 27. Muhammad Shoaib S/O Muhammad Zahoor Tariq Ali Qureshi Librarian Ayub Teaching Hospital Complex Abbottabad,
- 28. Usman Ullah S/O Muhammad Rashid, Village & P.O Wekrup Tehsil Mestuj District Upper Chitral.
- 29. Zaheer Ahmad S/O Aurang Zeb, Jinnah Degree College of Commerce Havellian
- 30. Khuram Saqib S/O Muhammad Saqib, House No.Jr-80 Punjab University, Employee Colony New campus Lahore
- 31. Syed Imran Ali Shah S/O Syed Shah Nawaz Hussain Shah, Moh: Saddat, Village & P.O Mankarai, haripur
- 32. Rozee D/O Muhammad Shamraiz House No.185/I Khola Kehal Abbottabad.
- 33. Faryal Zaman D/O Mir Zaman, Sector B House No 180 Sheikh Maltoon Town Mardan.
- 34. Imtiaz Ahmad S/O Noor Khan Village Ghazi Kor, Tehsil Hamimzai, P.O Ghallanai, District Mohmand
- 35. Bilal Nawaz S/O Muhammad Nawaz Jinnah Degree College of Commerce & Management Sciences (City Campus) Pakhawal Chowk Mansehra.
- 36. Ismat Ullah Jan S/O Hukam Khan, 4D-Park Avenue University Town PAC, Peshawar.
- 37. Fawad Khan S/O Abid Ur Rehman House No.182, Street No.02, Sector: J4, Pahse: 02, Hayatabad, Peshawar.
- 38. Sarwar Azeem S/O Amir Azim Khan, Postal Address Village & P.O Charun Tehsil Mastuj District Chitral
- 39. Fawad Khan S/O Faqir Muhammad, Sawab khan Oil Dealer Shop No.46 Akbar Shaheed Market Khar Bajaur Agency
- 40. Muhammad Rashad S/O Fazli Subhan, Village & post office Sarai Bala Talash Dir Lower.
- 41. Asad Ali S/O Munitaz Khan, C/O Muhammad Tariq Safi Senior Planning Officer, Zakat. Social Welfare and Women Empowerment Deptt: B. Building Saddar road Peshawar Cantt:
- 42. Hassan Wazir S/O Painda Khan, House No 104/C Nawab Street Bannu.
- 43. Shahzeb Khan S/O Gul Badshah, C.O Gul Badshah, Supervisor WAPDA Computer Center . WAPDA House PESCO Peshawar.
- 44. Muhammad Farooq S/O Mazoullah Khan, Village Kattar, P.O Ghallanai, Tehsil; Halimzai, District Tribal Mohmand
- 45. Fida Ali S/O Mauli Khan, District Chitral Tehsil Mastuj P.O Shangram Village Lamkushum.
- 46. Rahat Ullah S/O Hameed Ullah Kp, District, Dir Lower, Timergra P.O 18,300 Village Koto
- 47. Amjad Khan S/O Qubad Khan, Mohallah Kausar Colony Village and P.O Zarakhela Tehsil Barikot District Swat.
- 48. Mansoor Ahmad S/O Shereen Muhammad, Deputy Commissioner Swat, Finance & Planning Wing Saidu Sharif Swat.
- 49. Farid Ullah S/O Hidayat Ullah, Mansoor, Soap & Chemical Industry L-5 Road Plot No.119 Inddustrial Estate Gadoon Amuzai Swabi
- 50. Syed Sadiq Hussain S/O Dada Jan, House No.197, Street No.5, Sector C-2, Phase 5, Hayatabad Peshawar.
- 51. Hameed Ullah S/O Haider Khan, Village & P.O Khulley (Doshera) District Charsadda
- 52. Adnan Khan S/O Hafiz Ur Rahman, Village Chapper PO & Tehsil Wari District Dir Upper.
- 53. Asad Ullah Khan S/O Mumtaz Khan, Village Khurrum Chenaj Sultan Khel, P.O Mian Mandi Gandhab, Tehsil Halimzai, Tribal District Mohmand Khyber Pakhunkhwa

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Attested to be true copy DIRECTOR, LOCAL FUND AUDIT KHYBER PAKHTUNKHWA, PESHAWAR

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KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION 2-Fort Road, Peshawar Cantl 017978

No. PSC/SR-VII/\_\_\_\_

Dated: 10/01/2022

To,

The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department, Peshawar

1

Subject:

REQUEST FOR ISSUANCE OF INTER-SE-SENIORITY/ MERIT LIST OF NEWLY RECRUITED AUDITORS (GENERAL, FEMALE, MINORITY & DISABLE OUOTA) IN DIRECTORATE OF LOCAL FUND AUDIT (FINANCE DEPARTMENT) (ADVT: NO 03/2018 S.NO 48, 49, 50, 51).

Dear Sir,

1 aim directed to refer to your letter No. SO (ESTT-II)FD/ 3-14/2013/LFA Dated. 29 October, 2021 on the subject noted above. The requisite combined inter-se-seniority of (63) selectees for the subject post is as under:-

erit	NA	ME WITH FATHERS NAME	DISTRICT/ZONE
der   I.	٨b	dur Rehman S/O Sharif Gul	Novesbera / 2
2.	Gł	nufran Uilah S/O Mughal Mir	Karak / 4
3.	51	kander Shah S'O Kariun Shah	Mardań / 2
÷f,	Н	lamild Folsal S/O Abdul Razid Khan	Karak / 4
5.	F	arooq Zainun S/O Lal Zaman	Nowshera / 2
6.		turian Ali Sliph S/O Fayyaz Ali Shah	Banny / 4
7	-	Shahid Ahmad S/O/Salar Ahmad	Mardan / 2
8		Mian Ata Ur Rehman Khan S/O Mian seif U	Rahman Nowshern / 2
	5.	Ijaz Ul Hay S/O-Sneed Ul Hag	Peshawar / 2
	10.	Nateni Ahmed S/O Abdur Rahim	Haripur / S
<b> </b>	11	kram Ullah S/O Abdullah	Peshawar/2
	12.	Muhammad Azam Khan S/O Muhammad P Khan	arosig Hännu i 4
	13. Sikander Ali S/O Syed Sher Shah		DI:Khan / 4
-	14,	Subal) (Auhammad S/O Gu) Midsomined	Manlan / 3
-	15	Naveed Alumad Klian 5/O Ravi Day Khan	Rannu / 4
┝┿	16	Johar Zaman Abbasi S/O Undi Uz Zaman	Khan Abhani, Abbeninbad I.S



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7.	Alters	14 Rehiman S.O (Lachie Monad	Karak / 4
Ŝ,	Viewat	Khan S () Amir Saed	Peshiwar / 2
ານ	Asifu	Ilah S () Naseer Ahman	Charsadda/2
<u>`</u> 11,	Minhai	nnukl Should S () Muhammad Zahour	Althonabad + S
21	, Usma	n Ullah S to Muhammant Rashid	Chim1/1
11	Multa	mmad Wagar Sitt Brahim Khan	Karak / 4
23	. Zabe	er Almied S () Aurang Zeh	Allvotaluil 4.5
2	4. Khu	ram Saqib S () Muhammad Saqib	Manselira / 5
2	Nho!	Huwan Ali Shah SA) Syed Shahnawaz Hussain	llaripur 1 \$
	16. Kh	ir Ut Relanan S/O Mukamuad Gul	Charsadda/2
	27. Ro	ree (1) (1) Muhammad Shanu'di	Abbonabad / 5
	28. Pa	ry al Zaman D O Mic Zantan	Dir Lawer / J
<del></del>	<u>, 29, 1n</u>	ulaz Ahmad S O Noor Khan	Mahmand Agency / 1
	30. H	lat Nanaz S.O. Aluhanimad Navnz	Mansehra (3
 	1.1	nnat Uitah Jah S O Hukam Khon	Dajaur Agy-/1
		Sianai ashraf LECi Muhammad Asival (F/Q)	Peshawar/2
		Abdul Hasit S/O Jabir Hussian (D/Q)	Peshawar/2
		Saman Zitt D/O Zia Mohi od Jin (F/Q)	Chiral / 3
	35.	Satwar Azeem S D Amir Azim Khan	Bajaur Agy / 1
	36,	Faward Khan S O Faqir Mohammad Multammad Rashad S O Farli Subhan	Dir Lower <sup>1</sup> J
	37.	And All S-O Munuaz Khan	Mahmand Agency / 1
	.38.	and the start allowing the following	FR Bannu / I
	,19.	Shahzeb Khan S/O Gill Badshah	Nohmand / 1
	40.	Molaminad Foreve S'O Mazo Ullah Khan	Mohmand Ageney / 1
	41,	Fida Ali S'O Nouli Khan	Chitral 23
	42.		Dir Lower 3
	#4		Swat-/1
	45	i i i i i i i i i i i i i i i i i i i	Swat / 3
		Faradultah S-O Hidayat Ullah	Chiral /3
		Synd Sadly Hussain S'O Dala Jan	Chlind / 3
	4	3. Twahah Shah D/O Zahir Shah (F/Q)	Nowshera 2

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	lameed Ullah S O Haider Khan	Bahaur Agy / 1
50.] 7	Aduan Khan S'O Hafiz Ur Rahman	trajan nega
	of Rahman	Dir Upper / 3
51.	Asad Ullah Khan S/O Mumtaz Khan	
52	Nut	Mohmand Agency (1
	Muhammad Sharif S/O Muhammad Nawa/ Khan	Bajmur Agy / 1
53.	Muhammad Kabir S/O Gul Janan	Orakzai Agency / I
54.	Faiza Nawaz D/O Syed Amir Nawaz (F/Q)	Gadoon Swab/3
55.	Tamanna Bibi D/O Muhammad Akram Shah (F/Q)	Mardan/2
56.		Dir Lower/3
57.	Saman Imad D/O Shabir Ahmad (F/Q)	Charsadda/2
58	Arfa Batool D/O Mushiaq Hussain (F/Q)	DI Khan/4
59	Khushboo D/O Zafar Saleem (F/Q)	Peshawar/2
6(	). Sanam Sarwar D/O Sarwar Qamar M/Q)	Swabi/2
6	1. Nirdosn Nazir'S/O Nazir Akhtar (M/Q)	Peshawar/2
	2. Joshua Jacob S/O Justin Jacob (MI/Q)	Peshawar/2
	3. Martha Boota D/O Boota Masili (31/Q)	Peshawar/2

Yours Sincerely,

(SÁJJAD RAZA) ASSISTANT DIRECTOR-IV

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·[725]  $\sqrt{2}$ алыны актат ' 091-9213750, 9213563 KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION Websits : mmingscarab 2-Fort Road, Peahawar Cantt. 023984 No. PSC/SR-VIII/\_ Dated: 04/04/2022 10,

The Secretary to Khyber Pakhtunkhwa Finance Department, Peshawar.

Reservation and objection regarding the Seniority of Auditor (BPS-14 and 15) as stood on 31.12.2021 due to violation of Civil subject: Servant Rule.

Dear Sir,

I am directed to refer to your letter No: SO(ESTT:II)/FD/3-14/201/LFA/Vol-IV dated 31.01.2022 on the subject noted above and to state that the Commission recommended sixty three (63) Auditors in different phases stating theirin inter-se-merit and thereafter as per your request sent inter-semerit of entire selectees on 10.01.2022 (copy enclosed) as per merit. The observations and the rules of Esta code quoted therein, pertains to promotion cadres, and not initial recruitment.

According to the rule 17(1)(a) (Seniority), ESTA Code "The seniority shall be determined in order of merit assigned by the selection Authority (copy enclosed). However, marks wise inter-se-merit of the selectees is enclosed for your convenience.

Therefore, the inter-se-merit conveyed by the commission may be considered as final.

Your's faithfully

(Sher Ajmal) Assistant Director-I Attested to be true Jopy

d Havyan Advocate High Court Netrict Courts Mardan

#### DIRECTORATE OF LOCAL FUND AUDIT KHYBER PAKIFFUNKHWA, PESHAWAR. Dated Peshawar the 22/ 24/2022

# NOTIFICATION

2

In pursuance of Sub-section (1) of Section 8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 No. LFA/ESTT: /S.L/2020/ /226-1332 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the competent authority has been please to order issuance of final seniority list of the Auditor (BS-15/14), Directorate of Local Fund Audit Khyber Pakhtunkhwa for information of all concerned.

Т		<b>C</b> alification	Date of Passing the	* Dour cile	Date of Birth .	Date of Entry into Gove	Date of ppointment to present post	Method of recruitment/ appointment	Place of present posting
	Name		SAS Exam			01-09-1996	01-09-1996	Initial Recruitment	TMA, B.D Shah
	Ir. Abdul Rashid KO	B.A	· •	Karak	04-01-1964		01-09-1996	Initial Recruitment	Text Book Board Peshawar
		M.A	-	Peshawar	12-04-1970	01-09-1996		By Promotica	TMA, Takht Bhai
<u> </u>				Mairdan	12-02-1962	25-04-1992	03-12-2001		TMA, Gamba:
1	Nr.Muhammad Shah E.L.			Karak	05-08-1968	28-10-1992	03-12-2001	By Promotion	TM1A, Town-IL
4	Mr.Noor Payo Jan 💦 🖓 🔿	FA	+		13-04-1968	28-10-1992	23-03-2002	By Promotion	Peshawar
5	Mr.Syed Tayyam Ali Shah	EU B.A	-	Buner	<u> </u>		17-01-2003	By Promotion	DIAC, DC Oifice
	Mr.Muhammad-Salim	NU D.COM		Abbomabad	01-07-1967	27-06-1995		Initial Recruitment	TMA, P2003
_				D.I Khan	10-04-1973	29-04-2005	29-04-2006		
7	Mr.Inayatullah —	M.B.A	<u></u>	Chitral	02-03-1974	19-02-2007	19-02-2007	Initial Recruitment	TMA, Mastuj
8	Mr.Nasir-Ud-Din.	M,COM	-		11-01-1980	15-02-2007	15-02-2007	Initial Recruitment	TMA Haripur
9	Mr.Ijaz Ahmad	МВА	-	Abbenabad		03-03-2007	03-03-2007	Initial Recruinment	TMA, Mansehra
10	Mr. Muhammad Matloob.	B.COM	-	Manselua	16-04-1979			Initial Recruitment	DIAC, LG&RDD
11	Nr. Muhammad Asad Yar	B.COM	+	Haripor	13-10-1983	26-02-3007	26-02-2007		
	1-Khan	p.COM			25-03-1978	23-05-2008	23-05-2008	Initial Recruitment	Headquarter
11	Mr. Shakil Ahmed	B.COM	•	Peshawar	01-03-1980	23-05-3008	23-05-2005	Initial Recruitment	Local Council Board Pesh
1	J Mr. Asad-Khan	MA Economics	-	FR Peshawar.	1-03-1700		-L	«	1

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# FINAL SENIORITY LIST OF AUDITORS BPS-14/15AS STOOD ON 31-12-2021

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S.No	Name	F .	1			Date of Entry	Appaintment in	Färt Föhlarte u.b.	place of present	
۶ 		Qualification	Passing the SAS Exam	Domicile	Date of Birth	into Gavi.	present post	"Ispaintment	TMA Nowshurs	
36	Mr. Asim Zia	BBA (HONS) MS	15-01-2018	Nowshera	02-09-1987	17-12-2013	17-12-2013	Isidal Regnances	TNA. Shabqadar	
37	Mr. Hafiz Muliammad Navçed	MBA (Finance) & SAS	15-04-2017	Charseilda	20-02-1989	17-12-2013	17-12-2013	Isinal Recruit ann	DIAG. Food Dapat	
38	Mr. Rashid Khan	MBA & SAS	15-01-2018	Moumand	25-12-1986	20-12-2013	20-12-2013	Isidial Receipters of	TELA, Swel	
39	Nr. Muhammad Farhad		12-01-2010	Agency Malakand	20-02-1985	17-12-2013	17-12-2013	tailial Recruitment	DIAC, Agriculture	
		M.SC .	-	Charsadda	11-02-1985	27-12-2013	27-12-2013	hitial Recruitment	DIAC, DC 5wa:	
40	Mr. Shahid Khan	BBA(Flons)		Swet	07-06-1987	18-12-2013	18-12-2013	Initial Recruitment	TALA, Dir Upper	
41	Mr. Zafat Ali	MBA	-	Dit	25-04-1987	17-12-2013	17-12-2013	bitiel Reenvitment.	TMA, Bamagram	•
42	Mr. Kalimullah	BBA (IT) B.COM		Manselua	02-01-1939	19-12-2013	19-12-2013	· Lilial Recruitment	TMA Haripur	- -
43	Mr. Nasir Farcaq Mr. Zia Farmap	MBA & SAS	15-04-2017	Abbenabad.	27-06-*386	19-12-2013	19-12-2013	· Initial Recruitment	TALA TOWA-IL	÷ •
4.4	Nr. Asifullah	MISC		Peshawar	01-06-1981	17-04-2003	30-12-2013	By Promotion	Peshawar TMA, Toun-I,	· ·
		ÉA	• -	Peshawar	08-09-1972	09-03-2006	03-02-2016	By Promotion	Peshawar TMA Charailda	9 - 1 - 1 1 - 1
H6	Mr. Istar ud Din	. BA	-	Charsadda	05-12-1986	07-03-2008	03-02-2016	By Promotives	Handquarter	- "
1 37	Mr. Haroan Shah Mr. Mohammad Jabir	NLCom	<b>.</b> .	Pashawar	12-12-1982	17-05-2009	03-02-2016	By Promotion	TNEA, Towa-I,	
48	Ahmad	ВА	-	Charsadda	05-04-1977	12-04-2010	06-03-2019	By Prometion	Peshawar TNIA Domel	
49	Mr. Hameedullah-I	B.Com		Karak	15-04-1992	01-06-2020	01-06-2020	Linal Remutment	B22232	4
50	Mr. Ghufran Ullah	BS Hons(Finance)	-	Mardan.	03-09-1991	01-96-2020	01-06-2020	tritical Recruitment	TMA Buner Swari	l'Act .
51	Mr. Sikandar Shah	BS Economics	•	Korek	01-09-1992	01-06-2020	01-06-2020	Laidal Recruitment	DLAC, Higher	ested t
52	Mr. Haroid Faisal			Nowshera	08-03-1990	01-06-2020	01-06-2020	Eridal Recruitment		R
53	Nr. Faroog Zamatt	B.Sc Hons (Economics)		Bannu	07-08-1992	01-06-2020	01-06-2020	Initial Recruitment	IAC, District Bannu	
54	Mr. Numan Ali Shah	M.Com		Mardan_	04-04-1989	01-06-2020	01-06-2020	laitial Recruitment	TMA Jehangira	
55	Mr. Shahid Ahmad	M.Com		Novyshera	01-04-1995	01-06-2020	01-06-2020	Isidal Recruitment	TMA Nosyshera	1
76	Mr. Mian Ata Ur Rahman Khan	BS Economics		Peshawar	31-01-1987	01-06-2020	01-06-2020	Isitial Recruitment	Headquart	$\overline{1}$
57	Mr. Iju VI Llag	МВА		1.221103491				1	· · · · · · · · · · · · · · · · · · ·	al job

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Muharifinad Hayyan Advocate High Court District Courts Mardan

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••		Qualification	Dute of Fassing .	Domicilo	Date of Birth	Dute of Entry Into Covi.	Dute at Appointment to present post	of select of recretions of appeliation
No	Nanie	Quantication	the SAS Exam	Peslinwär	15-02-1990	01-06-2020	01-05-2020	Initial Recruitment
82	Mr. Ikram Ullah	M.Com		A CONTRACTOR OF THE OWNER	15-02-1993	01-05-2020	01-06-2020	Initial Recruitment
<u>8</u> 3	Mr. Muhammad Azam	MBA	- <del>*</del>	Bannu		01-06-2020	01-06-2020	Initial Retruitment
84	Khan Mr. Sikander Ali	BBA (Hons)		D-I Kisan	19-10-1994	and the second se	01-06-2020	Initial Reensitesent
		M.Con, MS & MSc		Mardan	20-03-1988	01-06-2020	Children and Children 7 of Annal Street	Initial Recruitment
~\$5	Mr. Sohail Muhammad	Economics)		Bannu	01-03-1989	01-06-2020	01=06-2020	Initial Residence
\$6	Mr. Navced Alunad Khan	MBA		Abboltabad	11-12-1989	01-06-2020	01-06-2020	Initial Recruitment
<u>\$7</u>	Mr. Joher Zaman Abbasi	MBA MBA		Karak	23-03-1991	01-06-2020	01-06-2020	Initial Requirment
85		M.Com		Peshawar	15-09-1985	01-06-2020	01-06-2020	Initial Recruitment
\$9		M.Com		Charsodda	10-04-1992	27-08-2020	27-08-2020	and the second
\$0		M.Com/MS		Abbottabad	29-05-1989	01-06-2020	01-06-2020	Initial Recutitment
91		B.Com	-	Chitral	06-03-1996	01-06-2020	01-06-2020	Initial Recruitment
93	and a second	MBA	÷	Kacak	01-04-1991	27-08-2020	27-08-2020	Initial Recruitment
	transfer and the second s	M.Com	÷	Abhottabod	10-04-1990	01-06-2020	01-06-2020	Initial Recruitment
95	and and a set of the set	MBA.		Mánschra	01-01-1993	01-06-2020	01-06-2020	Initial Recruitment
96		B.Com	*	• Elací Pur	16-05-1988	01-05-2020	01-06-2020	-Initial Recruitment
97	Miss. Rozer	M.Com	-	Abbottabad	07-10-1991	01-06-2020	01-06-2020	Initial Recruitment
98	Mrs. Faryal Zaman	- MS		-Marçlan	18-12-1988	01-06-2020	01-06-2020	Initial Recruitment tested to b
99	Mr. Imilaz Ahmad	MBA, MS & MSc (Eco)		Mohmand Agency	25-03-1991	01-06-2020	01-06-2020	Initial Recruitment
10	0 Mr. Bilal Nawaz	M.Cem		Mansehra	02-11-1995	01-06-2020	01-06-2020	Initial Recruitment
10	ومنصبت ستحيدها والإلادي مترجع مصحصه مستعد ومحمد المرجوم	M.Com	ST:	Bajaur	12-02-1996	01-06-2020	01-05-2020	Initial Recruitment
20	and a second	M.Com		Chitral	04-02-1986	01-06-2020	01-05-2020	Initial Recruitment
10;	) Mr. Fawed Khoa	MBA	i	Bajaur	01-01-1987	01-06-2020	01-05-2020	Initin! Reemirment

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Muhammad Hayyan Advocate High Court District Courts Mardan

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No			Qualification	Date of Passing the SAS Exam	Domicile	Date of Birth	Date of Entry into GovL	Date of Appointment to present post	Method of recretiment/ appointment/
04	Mu	r. Muhammad Rashad	MBA	-	Dir Lower	04-05-1933	01-06-2020	01-06-2020	Initial Recruitment
105	M	ir. Asad Ali	M.Com	-	Mohmand Agency	14-02-1989	01-05-2020	01-06-2020	Initial Recruitment
10(	5 ] A	Ar. Hassen Wazir	MBA ,MS & MA(Political Science)	_	FR Bannu	16-02-1988	01-06-2020	01-06-2020	Initial Recruitment
10	17 1	MrShahzeb Khan	MS	-	Mohmand Agency	09-07-1988	01-06-2020	01-06-2020	Initial Recruitment
1	08	Mr. Fida Ali	Bachelor in Business Studies	æ	Chibrel	16-12-1994	01-06-2020	01-06-2020	Initial Recruitment
	109	Mr. Rahat Ullah	B.Com	•	Dir Lower	20-09-1995	01-06-2020	01-06-2020	Initial Recruitment
	110	Mr: Amjød Khan	BBA (Hons)		Swat	05-03-1987	01-06-2020	01-06-2020	Inital Recruitment
Γ	111	Mr. Mansoor Ahmad	MS		Sweit •	17-08-1987	01-06-2020	01-06-2020	Initia Recruitment
-	112	Mr. Farid Ullah	M.Com	-	Chitral	10-02-1985	01-06-2020	01-06-2020	-Initial Recruitment
	113	Mr. Syed Sadiq Hussein	MBA	-	Chitral	10-01-1993	01-06-2020	01-06-2020	Initial Recruitment
	114	Mr. Hameed Ullah-II	M.Com	-	Bajaur	10-11-1994	01-06-2020	01-06-2020	Initial Recruitment
	115	Mr. Adnan Khan	B.Com	-	Dir Upper	05-02-1997	01-06-2020	01-06-2020	Initial Recruitment
	116	5 Mr. Asad Ullah Khan	MBA.		Mohmand Agency	18-05-1991	01-05-2020	01-06-2020	Initial Recruitmen

(7-7)

Attested to be true copy

Endst; No & date even.

Copy forwarded to:

I. The Section Officer (Estt-II), Finance Department Government of Khyber Pakhtunkhwa.

2. All Concerned.

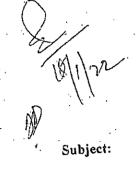
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DIRECTOR LOCAL FUND AUDIT, KHYBER PAKHTUNKHWA, C PESHAWAR. LOCAL FUND AUDIT KITYBER PARHTUNKHWA

Muhammad Hayyan Advocate High Court District Courts Mardan





То

# RESERVATIONS AND OBJECTION REGARDING THE SENIORITY LIST OF AUDITORS BPS-14/15 AS STOOD ON 31-12-2021 DUE VIOLATION OF CIVIL SERVICE RULES.

Respected Sir,

The Director

Local Fund Audit

Khyber Pakhtunkhwa

Directorate of Local Fund Audit

With due respect it is stated with great concern that there has been clear violation of the following rules of the act and ordinance regarding the issuance of SEMIORITY LIST OF AUDITORS BPS-14/15 AS STOOD ON 31-12-2021:

THE KHYBER PAKHTUNKHWA CIVIL SERVANTS ACT, 1973. [KHYBER 1

PAKHTUNKHWA] ACT NO. XVIII OF 1973 COMMISSION SERVICE PUBLIC PAKHTUNKHWA (AMENDMENT) ORDINANCE, 2002 (KHYBER PAKHTUNKHWA ORDINANCE XXVII OF 2002) vide NOTIFICATION NO. KP/PSC/ 41094 A.

The respective rules from the act and notification are quoted below:

Under CHAPTER-II, TERMS AND CONDITIONS OF SERVICE OF SERVANTS, subheading Serial No 8, Seniority, Subsection 4, of THE KHYBER (i). PAKHTUNKHWA CIVIL SERVANTS ACT, 1973. [KHYBER PAKHTUNKHWA]

ACT NO. XVIII OF 1973, rule page attached (Annex-A), it is stated: "Seniority in a post, service, or cadre to which a civil servant is promoted shall take effect from the date of regular appointment to that post:

Provided that civil servants who are selected for promotion to a higher post in one batch shall, on their promotion to the higher post retain their inter-se seniority as in the lower · post."

The above rule in its first para clarifies that the seniority will first take effect from the date of regular appointment, which isn't being followed and in second para the seniority will be inter-se, only among the same batch, which has joined from that specified regular date. That too has been violated. Different batches with different dates of joining have been merged into one inter-se seniority list without considering date of joining. This has affected me and my batch fellow employees who has joined on the same date i-e 10-09-2019 and have been put down at the bottom of seniority list.

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Hayyan Muha Advocate High Court **District Courts Mardan** 

(ii). Under PART - XI MERIT LIST / ZONAL ALLOCATION / RECOMMENDATION, subheading Serial No 34, Recommendations, Subsection (c), OF KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION (AMENDMENT) ORDINANCE, 2002 (KHYBER PAKHTUNKHWA ORDINANCE XXVII OF 2002) vide NOTIFICATION NO. KP/PSC/ 41094 A, rule page attached (Annex-B), it is stated: "At the time of advertisement, separate serial numbers, and sub-serial number shall be given to each subject. [serial-wise / sub serial-wise] recommendations along with inter-seseniority shall also be conveyed to the department."

The above rule clearly stipulates that the inter se seniority recommendation will be in accordance with the serial-wise/ sub serial-wise, which means different serial number candidates seniority will be separately dealt and will follow inter se seniority pattern. No two serial number seniority will be mixed or compiled with one another. It has happened in this case resulting in violation of this ordinance as well. (The concerned advertisement attached) (Annex-C).

Moreover, the ability test for Female Auditors (BPS-14) In Local Fund Audit, Finance Department. (Advt: No. 03/2018, S. No. 49) and Auditors (BPS-14) (M/Q) +(Disabled Quota) In Local Fund Audit, Finance Department. (Advt: No. 03/2018, S. No. 50 and 51) was held on 22/12/2018 (1723) Evening Session. Whereas, test for Forty Nine Auditors (BPS-14) In Local Fund Audit, Finance Department. (Advt: No. 03/2018, S. No. 48) held on 10/04/2019 (8174) Evening Session. Combined Merit list has been made of above mentioned posts although ability tests were held on different dates. (The concerned schedule for ability tests are attached) (Annex-D).

Respectfully Sir, our seniority has been affected by not considering the above rules, since our induction (interview result notification of our batch 'attached i-e Female Auditors (B-14) In Local Fund Audit, Finance Department. (Advt: No. 03/2018, S. No. 49), Date and time of display result: 2019-07-25 11:09:24) was done earlier and we had joined the service months prior from the other employees (interview result notification of their batch attached i-e Auditor (B-14) In Directorate of Local Fund Audit. (Advt: No. 03/2018, S.No 48). Date and time of display result: 2019-12-23 12:48:31), yet we got last positions in the seniority i-e 79, 80, 97-106 in mentioned SENIORITY LIST OF AUDITORS BPS-14/15 AS STOOD ON 31-12-2021. (List attached). In the previous SENIORITY LIST OF AUDITORS BPS-14/15 AS STOOD ON 17-02-2021, we were from 59 to 71 (list attached) (Annex-E), which has been altered in the current seniority list.

All est Attested

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Muham

WUDamiMăd Hayyan Advocate High Court District Courts Mardan

It is therefore, requested to arrange the seniority list in accordance with the stipulated service rules, in order of date of joining, seniority, batch inter-se seniority list, in accordance with the serial and sub serial number of the advertisement. The aggrieved candidates' signatures are attached in respect of the application for grievance redressal.

#### Thank You.

Attestal

Yours Sincerely,

All the Auditor BPS-14 (Female Quota, M/Q and Dissable Quota)

Local Fund Audit, Finance Department. (Advt: No. 03/2018, S. No. 49,50 and 51)

&thestery

Dated: 17th January, 2022

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Muh Mid Hayyan Advocate High Court District Courts Mardan

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S.No	NÁME WITH FATHER NAME	DISTRICT /	SIGNATURES
s formets		ZONE	
1	Kainat Ashraf D/O Muhammad Ashraf	Peshawar/ 2	Harris mit
2	Saman Zia D/O Zia Mohi Ud Din	Peshawar/ 2	Sur Zi
3	Twahah Shah D/O Zahir Shah	Nowshera/ 2	A Plann
4	Faiza Nawaz D/O Syed Amir Nawaz	Gadoon Swabi/3	Const St
5	Tamanna Bibi D/O Muhammad Akram Shah	Mardan/ 2	At
6	Sohny Bibi D/O Muhammad Nawaz	Dir Lower/ 3	Celowin
7	Saman Imad D/O Shabir Ahmad	Charsadda/ 2	20102 ·
8 -	Arfa Batool D/O Mushtaq Hussain	DI Khan/ 4	A Brank
. 9.	Khushboo D/O Zafar Saleem	Peshawar/ 2	
10	Sanam Sarwar D/O Sarwar Qamar	Swabi/2	Damas
11	Nirdosh Nazir S/O Nazir Akhtar	Peshawar/2	Aug Broken
· · · · · · -	Joshua Jacob S/O Justin Jacob	Peshawar/2	a Vestig

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13	Martha Boota D/O Boota Masih Peshawar/2	-	
14	Abdul Basit S/O Jabir Hussain Peshawar/2		·.

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Muhammad Hayyan Advocate High Court District Courts Mardan



Anner - 18

The Director. Local Fund Audit, Khyber Pakhtunkhwa.

#### Subject: <u>RESERVATIONS AND OBJECTION REGARDING THE SENIORITY LIST</u> OF AUDITORS BPS-14/15 AS STOOD ON 31-12-2021 DUE TO VIOLATION OF CIVIL SERVICE RULES

Please refer to finance department letter NO:SO(ESTT:II)/FD/3-14/2013/LFA/VOL-IV dated 14-4-2022 (Annex-A) received in response to your office letter NO.LFA/Estt:/Recruitment/2020/206 dated 21-1-2022 (Annex-B).

The objections raised by the undersigned on seniority list issued by your office vide letter NO:LFA/ESTT:/S.L/2020/1226-1332 dated 22-4-2022 (Annex-C) already communicated to you vide letter NO NIL dated 18-1-2022(Annex-D) still stand.

Rule17 (1) (a) of Part (IV) of CIVIL SERVANTS (SENIORITY) RULES 1993 provided by kppsc vide letter No.PSC/SR-VIIII/023984 Dated 04/04/2022 Annex-E) which Cleary states that, "The seniority inter se of civil servants<sup>55</sup> (appointed to a service, cadre or post) shall be determined:-

(a) In the case of persons appointed by initial recruitment, in accordance with the order of merit commission <sup>56</sup>[ or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection."

In the instant case, auditors (female, disable and minority) quota were appointed/selected seven months earlier than auditors appointed in a general quota moreover their test, interview and date of recommendation date were also different. Therefore, in light of above quoted rule of seniority, auditors appointed earlier should be ranked senior to the auditors appointed in general quota. It is pertinent here that a final seniority list has already been issued by your office vide letter No.LFA/ESTT:/S.L/2017/46-47 dated 17-2-2021 (Annex-F) wherein auditors appointed in general quota were ranked junior.

It is therefore requested that the case may be reconsidered to avoid any future complications/litigations.

Thanking you in anticipation.

Attested to be true copy



Muhammad Hayyan Advocate High Court District Courts Mardan All the Auditors BPS-14 (Female, minority and Disable) quota Local Fund Audit, Peshawar

Yours sincerely,

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Τo,



Anver-P

The Secretary, Finance Department Khyber Pakhtunkhawa.

Through:

Subject:

To.

Local Fund Audit, Khyber Pakhtunkhwa.

The Director.

#### RESERVATIONS AND OBJECTION REGARDING THE SENIORITY LIST OF AUDITORS BPS-14/15 AS STOOD ON 31-12-2021 DUE TO VIOLATION OF CIVIL SERVICE RULES

Please refer to the subject cited above, it is stated with due respect that final seniority lists of auditors (BPS 14/15) were issued vide NO.LFA/Estt/S.L/2017/320-322 dated 29-01-2020 and vide No.LFA/Estt/S.L/2017/46-47 dated 17-2-2021 (copies enclosed) and the same were not objected within stipulated time rendering them accepted and final.

However, seniority list of the auditors (BPS 15/14) Directorate of local fund audit was issued vide No.LFA/Estt/S.L/2017/60-61 with considerable and unjustified changes in the aforementioned tentative seniority list which was challenged with objections supported by rules/law dated 18-1-2022 (copy enclosed).

It is stated with great concern that final seniority list of auditors (BPS15/14) Director Local Fund Audit was issued vide No. LFA/Estt/SL/2020/1226-1332 dated 22-4-2022 on the basis of joint inter se seniority list issued by public service commission that stands disputed. The undersigned have observation that test, interview and arrival dates of auditors appointed in other quotas are different from that of auditors appointed in general quota. Therefore, issuance of their joint inter se seniority list is against the rule (copy already enclosed).

It is therefore, requested to forward the case for seeking advice from Establishment Department for edressal of our grievances.

Looking forward to positive action from higher authorities as the case has far reaching impact on our professional career.

Attested to be true copy Yours sincerely, All the Auditors BPS-14

(Female, minority and Disable) quota Local Fund Audit, Peshawar.

A He sted

Muhai Amad Hayyan Advocate High Court District Courts Mardan





NO.LFA/Estt:/Recruitment/2020/249.5-97 Dated Peshawar the 26 / 09 /2022

(Annex - B

#### All Auditors,

(Female, Minority & Disable Quota's) Directorate of Local Fund Audit, Khyber Pakhtunkhwa, Peshawar.

Subject:

Τo

#### RESERVATION AND OBJECTION REGARDING THE SENIORITY LIST OF AUDITOR (BS-14/15) AS STOOD ON 31-12-2021 DUE TO VIOLATION OF CIVIL SERVANT RULES.

I am directed to refer to a copy of Government of Khyber Pakhtunkhwa, Finance Department letter NO. SO(ESTT-II)/FD/3-14/2022 /Rectt:/LFA dated 15-09-2022 alongwith its enclosure which is very much clear and self explanatory for information please (Copies enclosed)

> DEPUTY DIRECTOR (HQ) LOCAL FUND AUDIT, KHYBER PAKHTUNKHWA, PESHAWAR.

SHIES Kick

Attested to be true copy

Muhammud Hayyan Advocate High Court

District Courts Mardan



To

#### DIRECTORATE OF LOCAL FUND AUDIT KIIYBER PAKIITUNKIIWA, PESIIAWAR

NO.LFA/Esit:/TiecrulimenU2020/ 1695-96 Dated Peshawar the 9-1 10 12021

## The Section Officer(Estt-II), Govt. of Khyber Pakhtunkhwa, Finance Department.

Subject:

LIST OF	FOR ISSUANCE	OF INTER-SI	-SENIORITY	<u>/MERIT</u>
	NEWLY REC MINORITY		ITORS (GE	NFICAL
DIRECTO	ATE OF TO	AND DISAL	ILE OUOI	
DEPARTM	ENT) ADV NO.0	V2018 S.NO.48, 4	19, 50, 51.	

Please refer to subject cited above.

It is submitted for your kind information that Khyber Pakhtunkhwa Public Service Commission has recommended 63 Nos of candidates for appointment to the post of Auditors (BS-14) in the Directorate of Local Fund Audit (Finance Department) through adv. No.03/2018 at S.No (48, 49, 50, and 51). In the first phase 09-Nos of Auditor (Female Quota) were recommended vide letter No. vide PSC/SR-V11/017292 dated 09-08-2019 (Copy enclosed as Annex-I). In the second phase 04- Nos of Auditors (Minority Quota) vide letter No.PSC/SR-VII/017256 dated 09-08-2019 (copy enclosed as Annex- II). In the third phase 01 number of Auditor (Disable Quota) was recommended vide letter No.PSC/SR-VII/017288 dated 09-08-2019 (copy enclosed as Annex- III) and in the forth phase 49-Nos of Auditor (Disable Quota) were recommended vide letter No.PSC/SR-VII/017288 dated 09-08-2019 (copy enclosed as Annex- III) and in the forth phase 49-Nos of Auditor (General Quota) were recommended vide letter No.PSC/SR-VII/Auditor/2020/ 011776 dated 11-11-2020 (copy enclosed as Annex- IV)

It is therefore, requested to kindly approach the Khyber Pakhtunkhwa Public Service Commission to provide Inter-se-seniority/combine merit list of all Quota's (i.e. General, Female, Minority & Disable) of Auditors (BS-14) to this Directorate to update the seniority list upto on 31-12-2021 in the public interest

An early action in this regard will highly be appreciated

DIRECTOR LOCAL FUND AUDIT. HYBER PARHTUNKHWA. PESHAWAR.

DIREFOR LOCAL FUND AUDIT, IYBER PAKITUNKHWA,

PESHAWAR.

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Endst; No & date even. Copy forwarded to: 1. The Director Recruitment Khyber Pakhtunkhwa Public Service Commission, Peshawar is also requested for subject matter please.

Attested to be true copy

please.

Muhari mad Hayyan Advocate High Court District Courts Mardan 151

# GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT

O Honce Department, Civil Socretariat, Poshawar	() thando gkp.pr	G nnoncerpgovt	Manance spoort
NO:SO(ESTT-II)FD/3-14/2013/1	- Δ	Dated:	29-10-2021

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The Director (Recruitment), Public Service Commission, Khyber Pakhtunkhwa

Subject.

## REQUEST FOR ISSUANCE OF INTER-SE-SENIORITY / MERIT LIST OF NEWLY RECRUITED AUDITORS (GENERAL, FEMALE, MINORITY & DISABLE QUOTA) IN DIRECTORATE OF LOCAL FUND AUDIT (FINANCE DEPTT: ADV NO.03/2018 S.No.48,49,50,51.

I am directed to refer to the subject noted above and to enclose herewith a copy of letter No<sub>1</sub>LFA/Estt:/Recruitment/2020/1695-96 dated 26.10.2021 received from Directorate of LFA, Kyber Pakhtunkhwa alongwith its enclosures and to state that kindly provide inter-se-seniority/combined merit list of all quotas (i.e General, Female, Minority and Disable) of Auditors (BS-14) to this Department for onward submission to the quarter concerned, please.

Encl: As above

#### Section Officer(Estt-II)

## Endst:No: & date even

Copy forwarded for information to the:-

Director, Local Fund Audit, Khyber Pakhtunkhwa Peshawar with reference to his letter No quoted above.

- PS to Addl: Secretary (Admn), Finance Department.
- 2. PS to Addi: Secre 3. Officer order file.

17-68 Section Officer(Esttyll)

Attested to be true copy

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NUNATIONAD Havyan Advocate High Court District Courts Mardan



# GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT

Q.Finance Department Civil Secretariat Pethawar @ http://www.finance.gkp.pk Tarebook.com/GokPID y wittercom/GokPfO No: SO(Esil-II)/FD/1-45/2021

Dated Pesh: the 17-01-2022

To

The Director, Local Fund Audit, Khyber Pakhtunkhwa,

Subject: -REQUEST FOR ISSUANCE OF INTER-SE-SENIORITY/MERIT LIST OF NEWLY RECRUITED AUDITORS (GENERAL, FEMALE, MINORITY AND DISABLED QUOTA) IN DIRECTORATE OF LOCAL FUND AUDIT FINANCE DEPARTMENT (ADVT: NO. 03-2018 S.NO.48, 49, 50, 51).

No. l letter am directed your to to refer LFA/Estt:/Recruitment/2020/1695-96 dated 26/10/2021 on the subject noted above and to enclosed herewith combined Inter-Se-Seniority/Merit List of (63) selectees for the subject post vid-e Assistant Director-IV, Khyber Pakhtunkhwa Public Service Commission letter No. PSC/SR-VII/017928 dated 10/01/2022 (in original) for information and further necessary action, please.

Encl. As above.

Section Officer (Estt-II

#### Endst: No: & Date even Copy forwarded for information to the:-

- Assistant Director-IV, Khyber Pakhtunkhwa Public Service 1. Commission w/r to his letter No. quoted above.
- PS to Secretary, Finance Department. 2.
- PS to Special Secretary (A&R), Finance Department. 3.
- PA to Additional Secretary (Admn), Finance Department. 4
- PA to Provincial Coordinator (PIAC), Finance Department. 5.

Section Officer (Estt-II)

Attested to be true copy

Havyan Advocate High Court District Courts Mardan

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# GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT

m/ConffD Dated Pesh: the 21.06.2022 O hein theine finance at a bi No. SO (ESTT-II)/FD/3-14/2022/Rocruilmon/LFA

> The Secretary to Khyber Pakhtunkhwa, **Establishment Department**

Subject:-

To

#### RESERVATION AND OBJECTION REGARDING THE SENIORITY LIST OF TO VIOLATION OF AUDITOR (BPS-14/15) AS STOOD ON 31.12.2021 DUE V ANT RULES.

Dear Sir.

I am directed to refer to the Subject noted above and to stale that Auditors (BS-14) recruited by Khyber Pakhtunkhka Public Service Commission under Female, Minority and Disabled quota's, has submitted an application, stating wherein that their test / interviews were conducted 6/7 months earlier than those appointed under general quota. Accordingly they join the cadre on 10-10-2019 and placed in Final Seniority Lists as stood on 31-12-2019 and placed senior in the Final Seniority Lists as stood on 31-12-2020 to those appointed under general quote in later selection and who joined service on 01-06-2020 (copies enclosed) However, in the Tentative Seniority List as stood on 31-12-2021 (copy enclosed) issued by Directorate on the basis of inter-se-seniority provided by the Public Service Commission (copy enclosed), with considerable changes. The observations of the Auditors on the Tentative Seniority lists were forwarded to the Commission for comments, who informed that the rules quoted in the application relates to promotion and stated that inter-se-seniority forwarded by them is covered under Rule 17(a) of the Seniority Rules, 1993 and advised that the inter-se-seniority provided by the Commission is correct and may be considered as final (copy enclosed).

Now the applicants have raised another observation stating that the inter-se-seniority issued by the Commission is itself against the rules quoted by them (copy enclosed). The main contention of the applicants is that when they join the cadre on 10-10-2019 i.e. 7/8 months earlier and placed in Final Seniority Lists as stood on 31-12-2019 and 31-12-2020 then how they are placed junior in the Tentative Seniority List as slood on 31-12-2021 to those who joined the cadre on 01-06-2020.

Keeping in view of the above, advice of Establishment Department to the above observation is solicited, please.

Encl: as above.



Yours faithfully,

Section Officer (Esti-II)

Endst: No. & Date even. Copy forwarded for information to:-The Director Local Fund Audil, Khyber Pakhlunkhwa.

PS to Secretary, Finance Department.

2. Attested 3. true cop

PA to Additional Secretary (Admn), Finance Department. Bhaz 16/022

Ha∨van u har Advocate High Court District Courts Mardan

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# MINUTES OF THE MEETING HELD ON 06-02-2023

#### SUBJECT: OBSERVATIONS / OBJECTIONS ON TENTATIVE SENIORITY LISTS AS STOOD ON M-12-2022

A meeting of the committee constituted on the subject above was held on 06-02-2023 under the Chairmanship of Mr. Fida Hussain Deputy Director in the Directorate of Local Fund Audit Khyber Pakhtunkhwa, Feshawar to discuss the subject issue. The following allended the meeting,

- 1. Mr. Fida Hussain, Deputy Director
- 2. Mr. Atta-ur-Rahman, Assistant Director
- 3. Mr. Inayat-ur-Rahim, Audit Officer,

The Chaitman welcomed the participants and invited Mr. M. Jabir Ahmad Auditor (E&A) to brief the participants about the subject cases. He briefed the participants that the following objections were raised on the seniority lists of Junior Clerks and Auditors respectively. OBSERVATION / OBJECTION OF MR. MUSADDIO ZIKRIA ON TENTATIVE

SENIORITY LIST OF JUNIOR CLERKS AS STOOD ON 31-12-2022 Two posts of Junior Clerks become vacant and each required to be filled through promotion. and initial appointment respectively as per service rules of Local Fund Audit Department. Mr. Sahibzada Arshad Mehmood (Daftari) was promoted to the post of junior clerk under 20% quota reserved for promotion whereas Mr. Musaddig Zikria son of Zikria Nooh was appointed as Junior Clerk under 80% quota reserved for initial appointment. He was appointed under retired employee's son quota on medical ground on request as his father Mr. Zikria Nooh Ex-Senior Scale Stenographer was retired on medical grounds on 20-01-2020.

Detail is tabulated below.	boom ball Mahmood	Mr. Musaddig Zikria
l'articulars	Mr. Sahinzada Atamat Green	16-11-1993
Date of Birth	01-08-19/7	31-03-2022 as Junior Clerk
Libate of Appointment	102-01-2012 lis souther	Initial Appointment
1		08-03-2022
Date of occurrence of Victory	02-01-2014 (i:e 2-years service as dallari for promotion as per service rules of LFA)	20-01-2021
involution /apponintation	31-03-2022	Initial Appointment
Clerk		

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Mr. Musadiq Zikria raised objection on the seniority list of junior clerks and requested that he may be placed senior from Mr. Subibunda Arshad Mahmood on the plea that he has been appointed against the post vacated by Mr. Sarjan Dass Junior Clerk whereas Mr. Sahibzada Arshad Mahmood was promoted against the post vacated by Mr. Atif Ali Junior Clerk who is junior to Mr. Sarjan Dass.

Decision

After thorough examination of the case, the committee decided that the request of Mr. Musaddiq Zakria cannot be acceded to in light of rules reproduced below and hence found the seniority list in order.

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luhanizha Hayyan Advocate High Court istrict Courts Mardan

Rule - 17 (2) of Part-VI of the Civil Servants (Appaintment, Promotion and Fransfer Rules, 1989)

"Seniority in various endres of civil servants appointed by initial recruitment vis-a-vis those appointed by initial recruitment vis-a-vis those regular appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that endre; provided that if two dates are the same, the person appointed otherselvest. appointed otherwise shall rank senior to the person appointed by initial recruitment.

Rule 17 (4) "The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different to determined from the made from different lower posts, enrying the same pay scale shall be determined from the slate of regular appaintment posts, enrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post. Provided that if the date of regular appointment/promotion of the civil servants in the lower post. Provided that if the date of regular months if the date of regular appointment/promotion of the civil servants in the lower post is the same, the civil servants in the lower post is the

same, the civil servant older in age, shall be treated senior." OBSERVATION / OBJECTIONS ON TENTATIVE SENIORITY LIST OF

# AUDITORS (BS-14-15) AS STOOD ON 31-12-2022

Sixty Three (63) posts of Auditors were advertised by the Khyber Pakhunkhwa Service Communication of Auditors were advertised by the Khyber Pakhunkhwa Public Service Commission vide Advertisement NO.03-/2018 (Serial No. 48, 49, 50, 51) dated 09-02-2016 methods and the Advertisement NO.03-/2018 (Serial No. 48, 49, 50, 51) dated 09-02-2018 under quota reserved for Merit, Women, Minority and Disable Persons. The Commission communicated recommendations in piece meal to the Department and appointment orders were issued accordingly. Consequently the appointees gradually submitted their arrival submitted their arrival reports for duty on receiving appointment orders.

On issuance of seniority list of auditors as stood on 31-12-2022, some of the auditors raised objections, that that have been to a store the seniority list objections that they have been recommended earlier but placed junior in the seniority list from those recommended later. They plead that they also submit their arrival reports well before to those who were recommended later.

Department forwarded their request to Khyber Pakhtunkhwa Public Service Commission through Finance Department for advice. The Commission conveyed inter-se-merit of all the 63 Auditors to be considered as final.

After thorough examination of the case, the committee decided that Rule 17 (1)(a) of Part-VI of the Civil Servants (Appointment, Promotion and Transfer Rules, 1989) and the Khyber Pakhtunkhwa Services Commission advice dated 04-04-2022 on the subject issue is quite clear. As the Commission conveyed their inter-se-seniority by merit assigned which was accordingly reflected in the seniority list of auditors as stood on 31-12-2022, therefore, the department has no domain to-make changes in the order of on SI-12-2022, included, its by the Commission being mandate of the Public Service

Rule 17 (1) (a) "The seniority inter se of civil servants (appointed to a service, cattre or post) Commission. Rule 17 (1) (a) the seniority and persons appointed by initial recruitment, in neordance shall be determined in the case of persons appointed by initial recruitment, in neordance shall be better and in a signed by the Commission or as the case may be, the with the order of internative provided that persons selected for appointment to post. Departmental Selection shall rank senior to the persons selected in a later selection;

The meeting ended with the vote of thanks.

Mr. M. Jabir Ahmad Auditor (E&A) Directorate of Local Fund Audit KPK Peshawar

્રે Mr. Inayat-ur-Rahim Audit Officer Directorate of Local Fund Audit **KPK** Peshawar

Mr. Atta-ur-Rehman

Assistant Director Directorate of Local Fund Audit KPK Peshawar

Mr. Fida Hussain Deputy Director Directorate of Local Fund Audit KPK Peshawar

Attested to be true copy



Islamabad, the 28th February, 1993

(ESTABLISHMENT DIVISION)

# CIVIL SERVANTS (SENIORITY) RULES, 1993.

R.O. 163 (I)/93.— In exercise of the powers conferred by section 25 of the Civil Servants  $_{d, 1973}$  (LXXI of 1973), read with section 8 thereof, the President is pleased to make the plowing rules, namely:-

1. Short title, application and commencement.- (1) These rules may be iled the Civil Servants (Seniority) Rules, 1993.

(2) They shall apply to all civil Servants except those governed under:-

- (i) the Police Service of Pakistan (Composition Cadre and Seniority) Rules, 1985;
- (ii) the Occupational Groups and Services (Probation; Training and Seniority) Rules, 1990; and
- (iii) the Establishment Division's O.M No. 1/2/74-ARC, dated 23<sup>rd</sup> January, 1974, amended vide O.M No.2/1/75.ARC dated 3<sup>rd</sup> March, 1976, and as amended from time to time.
- (3) They shall come into force at ence.

2. Seniority on initial appointment.—(1) Persons initially appointed on the commendations of the selection authority through an earlier open advertisement shall rank mior to those appointed through a subsequent open advertisement.

(2) If two or more persons are recommended in open advertisement by the selection authority their inter se seniority shall be determined in order of merit assigned by the selection authority.

(3) If only one candidate is recommended in open advertisement by the selection authority, he shall count his seniority from—

(a) the date of recommendation by the selection authority, if he was already holding the same on ad hoc basis; and

the date of his joining the post after being recommended by the selection authority, if he was not already holding the same post.

(b) Attested to be true copy

Muham Mad Hayyan

Advocate High Court District Courts Mardan .

#### RECOMMENDATIONS

<sup>54</sup>[A decision about recommendations to be made shall be approved by (a)the Members of Interview Panel concerned, the Member incharge of the subject and the Chairman]. Merit list shall be uploaded on website of the Commission. After approval, the Director concerned shall also convey the recommendations to the concerned Department. If suitable candidates are not available then posts may be re-advertised at the earliest and Secretary of concerned Department, Chief Secretary, Principal Secretary to Chief Minister / Principal Secretary to Governor

<sup>54</sup> The first sentence of Regulation 34(a) substituted vide Notification No. KPSC/B&A-52/2017/Vol-I/ 97992 dated 15.09.2017

## 24

 $\sum_{i=1}^{n-1} \frac{1}{n} \sum_{i=1}^{n-1} \frac{1}{n$ 

and Minister Incharge shall also be kept informed accordingly. The candidates recommended for appointment shall be informed of their selection within three days of the release of recommendation to the department. Non-adjusted and Non-marked candidates shall also be informed of their results.

- <sup>55</sup>[Where the experience forms part of the requisite qualifications, the (b) recommendations of in-service candidates shall be conveyed provisionally subject to perusal of their PERs by the Department concerned and finding these satisfactory.]
  - At the time of advertisement, separate serial numbers and sub-serial (c) number shall be given to each subject. <sup>56</sup>[serial-wise / sub serial-wise] recommendations alongwith inter-se-seniority shall also be conveyed to the department.
- <sup>57</sup>[After selection/ recommendation, if any discrepancy is found in (d) documents/ particulars of a candidate, the selection/ recommendation could be cancelled / withdrawn by the Commission before appointment. If the candidate is appointed by the department then the matter shall be referred to the department concerned for initiating Attested to Edisciplinary action based on the report of the Commission.

true copy



Advocate Figh Court District Courts Mardan

: 091-9213551 Phone 091-9211795 Fax www.kppsc.gov.pk Website



KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION 2-Fort Road, Peshawar Cantt. No. PSC/SR-VII/Auditor/2020/ 011776

Dated: 1 / 1 / 2020

The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.

Subject:

#### RECRUITMENT TO FORTY-NINE (49) POSTS OF AUDITOR FUND DIRECTORATE OF LOCAL (B-14) IN (FINANCE DEPARTMENT) ADV NO. 3/2018 S.NO 48.

Dear Sir. In continuation of this office letter No.PSC/DR/20/(DR)/2020 dated 23rd July, 2020 on the subject cited above and to state that Recommendation of Mr. Sajjad Ahmad khan S/O Noor Ahmad Khan was kept Pending due to his vital deficiencies but he failed to produce the same, therefore, the Commission recommends Mr. Khair Ur Rehman S/O Muhammad Gul of District Charsadda/2 to the Government for appointment in place of Mr. Sajjad Ahmad Khan S/O Noor Ahmad Khan of district Peshawar/2.

Recommendation in favor of the recommendee is further provisional subject to his 2. medical fitness and verification of all documents by the department before appointment.

Original application (with enclosures) of the above recommendee is enclosed herewith for your record.

4. District/Zone Name with Father Name Merit order Nowshera / 2 Abdur Rehman S/O Sharif Gul 1. Karak/4 Ghufran Ullah S/O Mughal Mir 2. Mardan / 2 Sikandar Shah S/O Karim Shah 3. Hamid Faisal S/O Abdul Razid Khan Karak / 4 4. Nowshera / 2 Farooq Zaman S/O Lal Zaman 5. Numan Ali Shah S/O Fayyaz Ali Shah Bannu / 4 6. Shehid Ahmad S/O Salar Ahmad Mardan / 2 7. Mian Ata Ur Rehman Klion S/O Mian Saif Ur Rahman Nowshera / 2 8. Ijaz Ul Haq S/O Saeed Ul Haq Peshawar/2 9. Nacem Ahmed S/O Abdur Rahim Haripur / 5 10. Peshawar/2 Ikram Ullah S/O Abdullah 11. Muhammad Azam Khan S/O Muhammad Farooq Khan Bannu / 4 12. Sikander Ali S/O Syed Sher Shah DI Khan / 4 13. Attested to be Sohail Muhammad S/O Gul Muhammud Mardan / 2 14. true copy Naveed Ahmad Khan S/O Rast Baz Khan Bannu / 4 15. Joher Zuman Abbast 8/0 Dadi Uz Zaman Khan Abbast Abbonabad / 5 16. Anees Ur Rehman S/O Bashir Ahmad Karak / 4 17. Yousaf Khan S/O Amir Saed Poshawar / 2 18.

Inter-se seniority of the Forty-Nine (49) selectees is under.

in and a start of the start of	h Sio Naseer Ahmad	Charsadda / 2
20.	Muhammad Shoub S-Q Muhammad Zahoor	Abbonabad / 5
J215 4	Finan Ullah S/O Muhaminagi Rashki	Chilmal / J
22.	Muhammad Waqar SO Ibrahim Khan •	Karak / 4
23.	Zahver Ahmed S/O Aurang Leb	Abboitabad / 5
24.	Khuram Saqib SO Muhammad Saqib	Mansohra / S
25.	Syed Imran All Shah S/O Syed Shahnawaz Hussain Shah	Haripar / 5
26.	Khair Ur Rehman S O Muhammad Gul	Charsadda/2
27.	Rozee D/O Muhammad Shamraiz	Abbottabad / 5
28	Farinal Zaman D'O Mir Zaman	Dir Lower / 3
29.	Imitaz Ahmad S/O Noor Khan	Mohmand Agency / 1
30.	Bilal Nawaz S/O Muhammad Nawaz	Mansehra / 5
31.	Ismat Ullah Jan S/O Hukam Khan	Bajaur Agy / 1
32.	Sanvar Azeem S/O Amir Azim Khan	Chitral / 3
33.	Fawad Khan S/O Faqir Mohammad	Bajaur Agy / 1
34.	Muhammad Rashad S/O Fazli Subhan	Dir Lower/ 3
35.	Asad Ali S/O Mumtaz Khun	Mohmand Agency / 1
36.	Hassan Wazir S/O Pinda Khan	FR Bannu / 1
37		Mohmand / 1
38	Mohammad Farooq S/O Mazo Ullah Khan	Mohmand Agency/1
39		Chitral / 3
40		Dir Lower/ 3
4		Swat / 3
4	2. Mansoor Ahmad S/O Shereen Muhammad	Swat / 3
4	3. Faridullah S/O Hidayat Ullah	Chiural / 3
4	4. Syed Sadiq Hussain S/O Dada Jan	Chitral/3
4	5. Hameed Ullah S/O Haider Khan	Bajaur Agy / 1
	6. Adnan Khan S/O Hafiz Ur Ralıman	Dir Upper / 3
	7. Asad Ullah Khan S/O Mumtaz Khan	Mohmand Agency / 1
	48. Muhammad Sharif S/O Muhammad Nawaz Khan	Bajaur Agy (1
+1	49. Muhammad Kabir S/O Gul Janan	Orakzai Agency / 1

Kindly acknowledge receipt.

mad Hayyar

5.

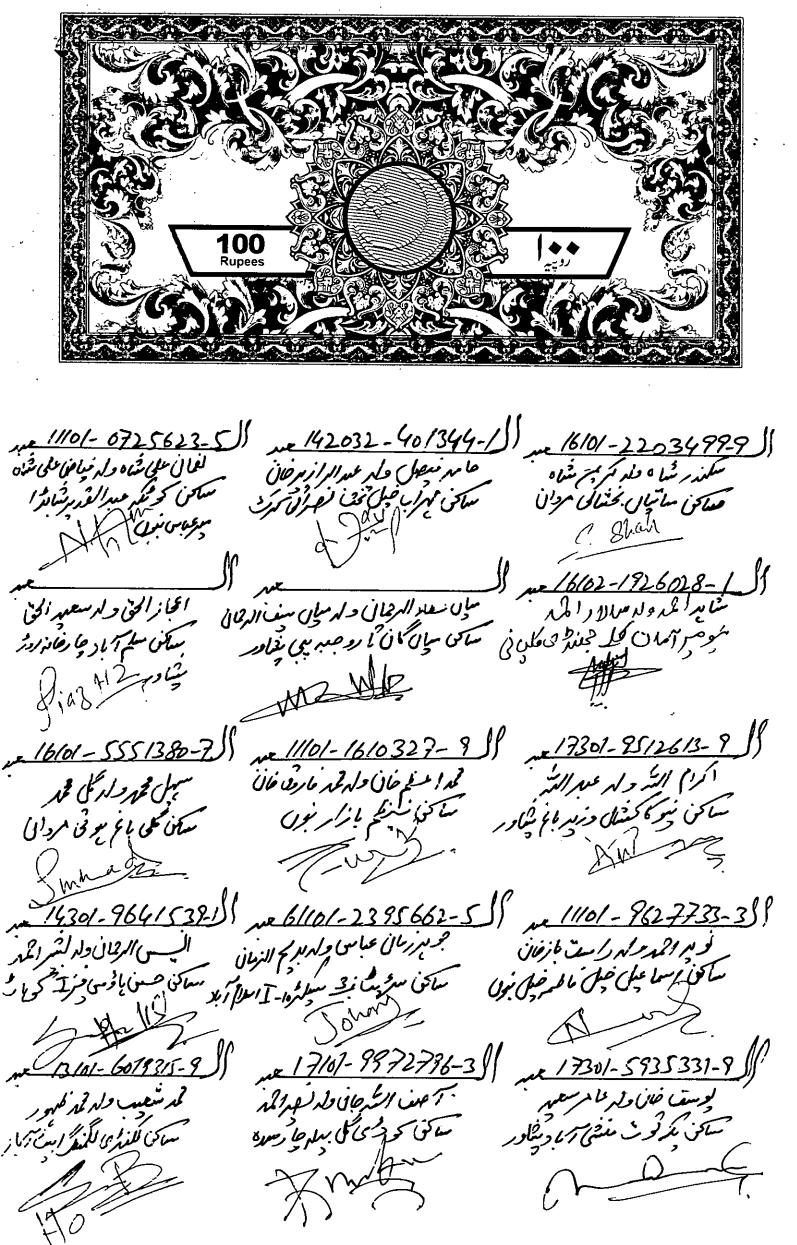
Advocate High Court strict Courts Blandon

Yours Sincerely,

(ILYAS SHAN) DIRECTOR RECRUITMENT ¶1

S137126

100 بعدالت جناب طيبير ، تحقو و المسروس ليربيون بساور م مات المرف بنام <u>دان مراحل فيد ارد من وغيره</u> . دعویٰ مسروس اسل مختيار نامه خاص اقرار کے لکھود جا ادبیتے ہیں۔ کہ مقدمہ بالا کی تروی سے بعجہ کاروبارد یکرممرونیات سے بذات خود معدور بول -لهذا اپنی جانب ے می مسابد/ کمد و لم مسال را کمد - مسکل ور مسکان و لمد کم مسل میں المقد و لم مجمع مکم مقرد کرے اخبارد جا ہوں ۔ کہ مختیار خاص دوئ ندکوره کی پروی میری احاد کی جانب ہے کریں۔وکیل مقرر ہے۔ بیان تحریر برتقد تق میری جانب ہے کریں۔اور اس کو داخل کریں۔کاغذات یا دیگر شوت تحریر ک طلب كرائي يا پيش كري ياموال وجواب كرب منكح نامه ورامنى نامه ورست برادرى يا اقبال دوك وي ما اقرار نامه ثالثى داخل يا تبول كرب مددوك ،جواب ديوك ،جراب اجواب، بیان دیوے، درخواست cpc (2) داخل کرے۔ درخواست منسوفی و کری اکا ۔ دانی کیطرفہ داخل کریں۔اور اس پرد سخط کریں۔ بیان خلفی داخل کرے ۔ یا دیگر درخواست کمی معمون کی چی کرے یا کوئی مطالبہ متعلقہ مقدمہ داخل کرے۔ یا داہس لے۔مقدمہ یں ایک تکر انی تظریانی، ایک درایک، اس عدائت ما تحت تا عدالت عالیہ وعلیٰ آف یا کتان دائیر پیش کریں۔ اجراء داخلی کرے۔ دقم وصول و داخل کرے۔ اور مقدے کے سیسلے میں جرک روان ہو عمل میں لائیں۔ جملہ ساختہ د پرادا ختہ بختیار موصوف کا مش کرنہ ذات فاص اب ع جول ومنظور من البدانختيار مد بداسندا تحري --مر 20 منر 20 · فحر تمالا ولرسناه سأس فحله متم حتم بمرا Catha fran 16101-8314238-1 15101-8233588-9 Jb



13/01-2692/05-2038387-5 . 15202-1108088-9 مراكم ولمرا ورتعزيب مرر ماروله البراسي مال) ماكن في المرولال تحث تد مرد كرك عنمان لاتته وليرتجه يرتشك م سان جري بد بال اتبال سای در کوپ شاکرام سوج جرال فريسان اسف وال 16101-5334469-8 1 x 13101-4854457-6 13503-8064725-5 ملا فسرال زمان زوج شادمان معلى معدى زمص لقب الترماير سم ذا من ولر فرز أم سان شيخ ملون المر في وان ساكن ينجاب يومور شي تأول لالايور مسای تی دی ج باوسید سرسانی است مباد بري الم KHSSA -13503-682-8013-9 J = 214029-850585-3 21103-7007305-3 سعمت الترمان ولد عكرخان بلك لوار ولد تدوار. ا مسار اجمد ولر تور خان مساحى حارشاني باجرم مسكل إمتميز كميك جليا وروفه مالسين مساعن فلاشى مازى كحير بهمد Imm Gint

یم**ت7**0روپے ا سريل نبر: \*∠ 021187 الذيك: عمام عمران إلد وكيب باركونس اايوى ايش نمر: 2005 - 17 رکٹ بار ایسوسی ایشن مردان (<sub>الط</sub>نر<u>، 9913443</u> 0.3/4\_ BCZYSO بعدالت جناب: <u>حسير عنه خراه سروس شريبونل يشاو</u> مناب: ریساند سان w ew / W كامترات اشرفه بنام :77 *ڈارُ* باکٹر لوکل مدیر آڈٹ وطیل تقانية: ر آ نگر مقدمه مندرجة غنوان بالاميں اين طرف ی وجوات دبی کاروا ایسے دا *سطے پ*یر و سررحيل = 32. 27-10) 10,00 آلنامقام کیاجاتا ہے کہ صاح**ک موصوف کومقد مہ کی کل کاردائی کا کا ل اخت**یار ہوگا، نیز ی دققر رثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخوا۔ نے کا اختیار ہوگا، نیز بصورت عدم پیرڈی یا ڈگری کیطرفہ یا پیل کی برآ مدگ اور انی دِنظر ثانی و پیردی کرنے کا مِحْتَار ہوگا اور بصورت ضر درت مقد مہ مذکورہ کے کل 15:7. کاردائی کے واسطے اور دکیل یا مختار قانونی کواپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور مقررشد ہ کووہی جمکۃ ندکورہ مالا اختیارات حاصل ہوں گےاوراس کا بساختہ برداختہ منظور قبول ہوگا۔ د دران مقدمہ دُوخ جَہ د ہر جانبالغ ایے مقدمہ کے سبب سے ہوگا اسکے جُس کیا جا ۔ · نیز بقایا دخرچتہ کی دصولی کا بھی اختیار ہوگا۔اگر کسی تاریخ پیشی پرڈیل موصوف دورہ پر ہویا مقام سے باہر ُہویا بیار ہو ،لېذادكانت ناميدكيودنيا تاكه ر صليب ناميدكيودنيا تاكه ما کوئی ضرور کی کام ہوتو دیکر تقشاحت ماہند نہ ہوں گے کہ بیروی **نہ کورہ کریں** T BAR ASSOCIATION KHYBER, BOWWINKHWA الرقوم: <u>8123 مقام</u>عة Munanyhad dayyan Advoc ( Artin Court District dury Mardan المرقوم. <u>کے لئے منظور ہے</u> منظور القيديق شده نوٹ اس دکالت نامہ کی نوٹو کابی نا قابل تبول ہوگی۔