

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

S.A No.1582/ 2022

Sanam Sarwar

VERSUS

Director Local Fund Audit etc

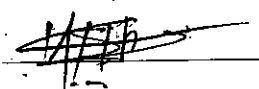
Khyber Pakhtunkhwa
Service Tribunal

Diary No. **7239**

Dated **29/8/23**

Appeal

S.No.	Descriptions	Annex:	Pages	
			From	To
1	<i>Para wise comment</i>			
2	<i>Affidavit</i>			
3	<i>Copy of Appointment Orders</i>	A,B,C		
4	<i>Copy of</i>	D, D1		
5	<i>Copy of</i>	E		
6	<i>Copy of</i>	F, G		
7	<i>Copy of</i>	H		
8	<i>Copy of</i>	I		

Respondent No 3 to 31 

Through Attorney

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

S.A No.1582/ 2022

Sanam Sarwar

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 43,45.

Respectfully Sheweth:

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 non-joinder 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

1. That 1st 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, 2nd 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)

PRAYER

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

Muhammad Hayyan
Advocate High Court

Through Counsel ~~_____~~

District 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.1582/ 2022

Sanam Sarwar

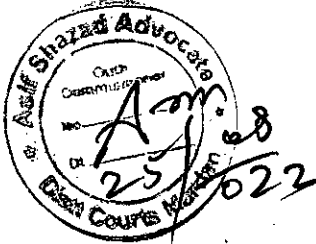
VERSUS

Director Local Fund Audit etc

Appeal

AFFIDAVIT

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 ~~Shahid~~

It is further stated on oath that in this appeal, the answering respondents have neither been placed en-parti nor their defense has been struck off.

Identified by

Muhammad Hayyan
Advocate High Court
District Courts Mardan

Muhammad Hayyan Advocate
High Court at District Courts
Mardan.

(1)
(Annex-A)

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KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION

2- For: hawar Cantt:
Website: www.kppsc.gov.pk

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

Dated: 09.02.2018

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 www.kppsc.gov.pk and apply online. The candidates are advised to fill all the columns carefully no change will be allowed later on. Unclaimed qualification, 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	
1.	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 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 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 or equivalent qualification recognized by PVMC, OR (b) M.Sc (Hons) / M.Phil / M.S in Veterinary / Animal Sciences / Bio chemistry, after basic degree of DVM or equivalent qualification recognized by PVMC having two years Research Experience with at least two Research Publication. OR (c) Doctor of Veterinary Medicine or equivalent qualification in Veterinary Sciences recognized by PVMC having five 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 & DAIRY DEVELOPMENT (RESEARCH WING) QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences 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) IN LIVESTOCK & DAIRY DEVELOPMENT (RESEARCH WING). QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences 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 nd Class Master's Degree in Journalism or Mass Communication or B.Sc (four 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 compulsory subject in B.A / B.Sc from a recognized University. AGE LIMIT: 22 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes ALLOCATION: Merit

Attested to be true copy

Muhammad Hayyan
Advocate High Court
District Courts Mardan

Attested

Attested

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43.	ONE (01) POST OF JUNIOR SCALE STENOGRAPHER (FEMALE QUOTA) QUALIFICATION: (i) Intermediate or equivalent qualification from a recognized Board and (ii) A speed of 50 words per minute in Shorthand in English and 35 words per minute in English Typing and (iii) Knowledge of Computer in using MS word and MS Excel. AGE LIMIT: 18 to 30 years PAY SCALE: BPS-14 ELIGIBILITY: Female ALLOCATION: Merit.
FINANCE DEPARTMENT	
44.	SIX (06) POSTS OF AUDIT OFFICER IN LOCAL FUND AUDIT. QUALIFICATION: Master's degree in Statistics, Economics, MBA (Finance) or M.Com (Accounts). AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Both Sexes ALLOCATION: Two to Merit and 01 each to Zone-2, 3, 4 & 5.
45.	ONE (01) POST OF AUDIT OFFICER (FEMALE QUOTA) IN LOCAL FUND AUDIT. QUALIFICATION: Master's degree in Statistics, Economics, MBA (Finance) or M.Com (Accounts). AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Female. ALLOCATION: Merit.
46.	TWO (02) POSTS OF COMPUTER OPERATOR IN LOCAL FUND AUDIT. QUALIFICATION: (i) At least 2 nd Class Bachelor's Degree in Computer Science or IT, (BCS or BIT four years), from a recognized University; OR (ii) At least 2 nd Class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education. AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-16 ELIGIBILITY: Both Sexes. ALLOCATION: One each to Merit & Zone-1.
47.	ONE (01) POST OF COMPUTER OPERATOR IN TREASURY & ACCOUNTS. QUALIFICATION: (i) Second Class Bachelor's Degree in Computer Science / Information Technology (BCS/ BIT four years), from a recognized University; or (ii) Second class Bachelor's Degree from a recognized University with one year diploma in Information Technology from a recognized Board of Technical Education. AGE LIMIT: 18 to 28 years. PAY SCALE: BPS-16 ELIGIBILITY: Both Sexes. ALLOCATION: Merit
48.	FORTY NINE (49) POSTS OF AUDITOR IN DIRECTORATE OF LOCAL FUND AUDIT. QUALIFICATION: (i) At least Second Class Bachelor's Degree from a recognized University with Mathematics, Economics or Statistics as one of the subject from a recognized University; or (ii) at least Second Class B.Com or Bachelor's Degree in Business Administration from a recognized University; or (iii) at least Second Class Bachelor's Degree from a recognized University with (a) ICMA one year post graduate certificate; or (b) CA (foundation); or (c) ACCA (Knowledge level qualified). AGE LIMIT: 20 to 30 years. PAY SCALE: BPS-14 ELIGIBILITY: Both Sexes. ALLOCATION: Eleven each to Zone-1, 2 & 3 and Eight each to Zone-4 & 5.
49.	NINE (09) POSTS OF AUDITOR (FEMALE QUOTA) IN DIRECTORATE OF LOCAL FUND AUDIT. QUALIFICATION: (i) At least Second Class Bachelor's Degree from a recognized University with Mathematics, Economics or Statistics as one of the subject from a recognized University; or (ii) at least Second Class B.Com or Bachelor's Degree in Business Administration from a recognized University; or (iii) at least Second Class Bachelor's Degree from a recognized University with (a) ICMA one year post graduate certificate; or (b) CA (foundation); or (c) ACCA (Knowledge level qualified). AGE LIMIT: 20 to 30 years. PAY SCALE: BPS-14 ELIGIBILITY: Female. ALLOCATION: Merit.
50.	FOUR (04) POSTS OF AUDITOR (MINORITY QUOTA) IN DIRECTORATE OF LOCAL FUND AUDIT. QUALIFICATION: (i) At least Second Class Bachelor's Degree from a recognized University with Mathematics, Economics, or Statistics, as one of the subject from a recognized University; or (ii) At least Second Class B.Com or Bachelor's Degree in Business Administration from a recognized University; or (iii) at least Second Class Bachelor's Degree from a recognized University; with (a) ICMA one year post graduate certificate; or (b) CA (foundation); or (c) ACCA (Knowledge level qualified). AGE LIMIT: 20 to 30 years. PAY SCALE: BPS-14 ELIGIBILITY: Both Sexes. ALLOCATION: Merit
51.	ONE (01) POST OF AUDITOR (DISABLE QUOTA) IN DIRECTORATE OF LOCAL FUND AUDIT QUALIFICATION: (i) At least Second Class Bachelor's Degree from a recognized University with Mathematics, Economics, or Statistics, as one of the subject from a recognized University; OR (ii) at least Second Class B.Com or Bachelor's Degree in Business Administration from a recognized University; OR (iii) at least Second Class Bachelor's Degree from a recognized University; with (a) ICMA one year post graduate certificate; or (b) CA (foundation); or (c) ACCA (Knowledge level qualified). AGE LIMIT: 20 to 30 years. PAY SCALE: BPS-14 ELIGIBILITY: Both Sexes. ALLOCATION: Merit

Attested to be true copy

Muhammad Hayyan
Advocate High Court
District Courts Mardan

Attested
Attested

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

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

No. PSC/SR-III/ 001442
Dated: 27/1/2020

To:

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

Subject:

**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).**

Dear Sir,

In continuation of this office letter No.PSC/SR-VII/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 5th vacancy of 6th 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
Share	27	27	26	20	20	120
Adjusted	27	27	26	20	20	120
Balance	-	-	-	-	-	Nil

5. Inter-Se-Merit is as under:

Inter-Se-Merit No.	Name with Father's Name	Domicile
1.	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
6.	Farooq Zaman S/O Lal Zaman	Nowshera / 2
7.	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.	Ijaz Ul Haq S/O Saeed Ul Haq	Peshawar / 2
11.	Hekmat Ullah S/O Muhammad Ismail Khan	FR Bannu / 1
12.	Naeem Ahmed S/O Abdur Rahim	Harpur / 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	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 Rasi Baz Khan	Bannu / 4
19.	Johar 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 Saed	Peshawar / 2
23.	Muhammad Shoab S/O Muhammad Zahoor	Abbottabad / 5
24.	Usman Ullah S/O Muhammad Rashid	Chitral / 3

P. Gil
M. J.
A. F.
A. F. / A.
23/1
M. W.

Secretary

P. Gil / A. C.

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True copy

Muhammad Hayyan
Advocate High Court
District Courts Mardan

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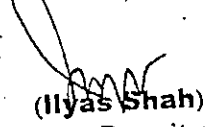
25.	Zaheer Ahmed S/O Aurang Zeb	Abbottabad / 5
26.	Khuram Saqib S/O Muhammad Saqib	Mansehra / 5
27.	Syed Imran Ali Shah S/O Syed Shahnawaz Hussain Shah	Haripur / 5
28.	Rozee D/O Muhammad Shamraiz	Abbottabad / 5
29.	Faryal Zaman D/O Mir Zaman	Dir Lower / 3
30.	Imtiaz Ahmad S/O Noor Khan	Mohmand Agency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

Endst: No. PSC/SR-II

Copy forwarded for information to:-

The Directorate of Local Fund Audit, Peshawar

Yours faithfully,



(Ilyas Shah)

Director Recruitment

Date: _____

(Director Recruitment)

Attested to be true copy


Muhammad Hayyan
Advocate High Court
District Courts Mardan



(5)

DIRECTORATE OF LOCAL FUND AUDIT
KHYBER PAKHTUNKHWA,
PESHAWAR
NO.LFA/Estt/Recruitment/2019/1154-1207
Dated Peshawar the 29 / 05 / 2020

OFFER OF APPOINTMENT

NO.LFA/Estt/Recruitment/2019/_____ On the recommendations of Khyber 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 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
6	Farooq Zaman S/O Lal Zaman	Nowshera / 2
7	Nouman Ali Shah S/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 Ul Haq S/O Saeed Ul 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 Sajid	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 Saqib S/O Muhammad Saqib	Mansehra / 5
27	Syed Imran Ali Shah S/O Syed Shah Nawaz Hussain Shah	Hari Pur / 5
28	Rozee D/O Muhammad Shamraiz	Abbottabad / 5
29	Faryal Zaman D/O Mir Zaman	Dir Lower / 3
30	Intiaz 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
35	Fawad Khan S/O Faqir Muhammad	Bajaur Agency / 1
36	Muhammad Rashad S/O Fazli Subhan	Dir Lower / 3
37	Asad Ali S/O Mumtaz Khan	Mohmand Agency / 1
38	Hassan Wazir S/O Pinda Khan	FR Bannu / 1
39	Shahzeb Khan S/O Gul Badshah	Mohmand Agency / 1
40	Muhammad Farooq S/O Mazoullah Khan	Mohmand Agency / 1
41	Fida Ali S/O Mauli Khan	Chitral / 3
42	Rahat Ullah S/O Hameed Ullah	Dir Lower / 3
43	Amjad Khan S/O Qubad Khan	Swat / 3
44	Mansoor Ahmad S/O Shereen Muhammad	Swat / 3
45	Farid Ullah S/O Hidayat Ullah	Chitral / 3
46	Syed Sadiq Hussain S/O Dada Jan	Chitral / 3

Muhammad Hayyan
Advocate High Court
District Courts Mardan

47	Hameed Ullah S/O Haider Khan	Bajaur Agency / 1
48	Adnan Khan S/O Hafiz Ur Rahman	Dir Upper / 3
49	Asad Ullah Khan S/O Mumtaz Khan	Mohmand Agency / 1

Term & conditions:-

- i. They will get pay at minimum of HPS-14 (15180-1170-50280) plus usual allowances as admissible under the rules. They will also be entitled to annual increment as per government policy.
 - ii. 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.
 - 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 duty to this Directorate as required under the rules.
 - 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.
 - ix. Their services are transferable anywhere in Khyber Pakhtunkhwa.
 - x. This appointment is subject to verification of their documents/ antecedents from the concerned authorities.
2. 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.

- S.O. -
DIRECTOR,
LOCAL FUND AUDIT,
KHYBER PAKHTUNKHWA,
PESHAWAR

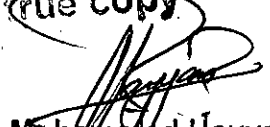
Endst; No & date even.

Copy forwarded to:

1. The Accountant General Khyber Pakhtunkhwa Peshawar.
2. The Section Officer (Estt-II) Finance Department Peshawar.
3. The Medical Superintendent Police & Services Hospital, Peshawar.
4. The Budget Assistant (HQ).
5. Abdur Rehman S/O Sharif Gul, Mohallah Gulabad, Village Nizampur, District & Tehsil Nowshera.
6. Ghufraan Ullah S/O Mughal Mir, Village Dabli Lawagher, Post Office, Tehsil and District Karak.
7. Sikandar Shah S/O Karim Shah, Muhallah Mamoolian Bakhshali, Tehsil and District Mardan.
8. Abdul Latif S/O Adam Khan, Mohallah Sherya Khel Village and Post office Gujar Garhi Distt Mardan.
9. Hamid Faisal S/O Abdul Razid Khan, Village & Post Office Chokara Tehsil Takht-e-Nasrati District Karak.
10. Farooq Zaman S/O Lal Zaman, Mohallah, Batakzul new road village Khesghi Bala PO Khesghi Payan District Nowshera.
11. 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 Maul Jhandi Bazar Railway Station Tehsil Takht Bhai District Mardan.
13. Mian Ata Ur Rahman Khan S/O Mian Salf Ur Rehman Village Taro Jabba Mohallah Miangan P.O Taro Jabba Distt Nowshera.
14. Ijaz Ul Haq S/O Saeed Ul Haq Muslim Abad, Near Masjid Kabuli Hamza Masjid Nothla, Charkhana Road, Peshawar Cantt
15. Hekmat Ullah S/O Muhammad Ismail Khan, Otin Khel P.O Qamar Killa Khandar Khun Khel Tehsil Domel District Bannu.
16. Naeem Ahmad S/O Abdur Rahim, House No.1081, Street No.2, Quresh Chowk, Sector No.1, Khalabat Township, Haripur, Khyber Pakhtunkhwa.
17. Ikram Ullah S/O Abdullah, House No.2094, Mohallah Wahab abad near O.H.S.S No.04, Guldana Chowk Kakshal, Peshawar.

Attested to be

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Muhammad Hayyan
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 Qasaban D-I Khan.
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, C/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, Islamabad
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 Ghorivala Tehsil & District Bannu.
26. Yousaf Khan S/O Amir Said, Outside Yakatoot, Zargarabad 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 Mastuj District Upper Chitral.
29. Zaheer Ahmad S/O Aurang Zeb, Jinnah Degree College of Commerce Havelian
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 Scichces (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 Azcem S/O Amir Azim Khan, Postal Address Village & P.O Charun Tehsil Mastuj District Chitral.
39. Faivad 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 Mumtaz 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 Painsa 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 Industrial 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 Chupper PO & Tehsil Wari District Dir Upper.
53. Asad Ullah Khan S/O Mumtaz Khan, Village Khurram Chena Sultan Khel, P.O Mian Mandi Gandhab, Tehsil Halimzai, Tribal District Mohmand Khyber Pakhtunkhwa

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Muhammad Hayyan
Advocate High Court
District Courts Mardan

DIRECTOR,
LOCAL FUND AUDIT,
KHYBER PAKHTUNKHWA,
PESHAWAR



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

No. PSC/SR-VIII/017928
Dated: 10/01/2022

(41)
186
8

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

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
DEPARTMENT) (ADVT: NO 03/2018 S.NO 48, 49, 50, 51).

Dear Sir,

I am 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:-

Merit order	NAME WITH FATHERS NAME	DISTRICT/ZONE
1.	Abdur Rehman S/O Sharif Gul	Nowshera / 2
2.	Ghufran Ullah S/O Mughal Mir	Karak / 4
3.	Sikander Shah S/O Karim Shah	Mardan / 2
4.	Hamid Faisal S/O Abdul Razid Khan	Karak / 4
5.	Farooq Zaman S/O Lal Zaman	Nowshera / 2
6.	Muhammad Ali Shah S/O Fayyaz Ali Shah	Dannu / 4
7.	Shahid Ahmad S/O Salar Ahmad	Mardan / 2
8.	Mian Ata Ur Rehman Khan S/O Mian Saif Ur Rahman	Nowshera / 2
9.	Ijaz Ul Haq S/O Saeed Ul Haq	Peshawar / 2
10.	Naeem Ahmed S/O Abdur Rahim	Haripur / 5
11.	Ibrahim Ullah S/O Abdullah	Peshawar / 2
12.	Muhammad Azam Khan S/O Muhammad Farooq Khan	Dannu / 4
13.	Sikander Ali S/O Syed Sher Shah	DI Khan / 4
14.	Sohail Muhammad S/O Gul Muhammad	Mardan / 2
15.	Naveed Ahmad Khan S/O Razi Daz Khan	Dannu / 4
16.	Johar Zaman Abbasi S/O Usdi Uz Zaman Khan Abbasi	Abbottabad / 5

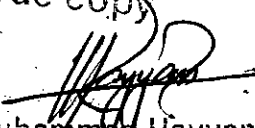
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Secy Finance KPK
Duty No. 550
Date: 10/1/22
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Muhammad Hayyan
Advocate High Court.
District Courts Mardan

17.	Anees Ur Rehman S/O Hashir Ahmad	Karak / 4
18.	Yousaf Khan S/O Amir Saad	Peshawar / 2
19.	Asif Ullah S/O Naseer Ahmad	Charsadda / 2
20.	Muhammad Shoaib S/O Muhammad Zahoor	Abbottabad / 5
21.	Husain Ullah S/O Muhammad Rashid	Chitral / 3
22.	Muhammad Waqar S/O Ibrahim Khan	Karak / 4
23.	Zabeer Ahmed S/O Aurang Zeb	Abbottabad / 5
24.	Khairan Sajid S/O Muhammad Sajid	Manshra / 5
25.	Syed Imran Ali Shah S/O Syed Shahnawaz Hussain Shah	Haripur / 5
26.	Khair Ur Rehman S/O Muhammad Gul	Charsadda / 2
27.	Rozee D/O Muhammad Shamraz	Abbottabad / 5
28.	Faryal Zaman D/O Mir Zaman	Dir Lower / 3
29.	Intiaz Ahmad S/O Noor Khan	Mohmand Agency / 1
30.	Ullah Nawaz S/O Muhammad Nawaz	Manshra / 5
31.	Ismat Ullah Jan S/O Husain Khan	Hajaur Agy / 1
32.	Khanat ashraf D/O Muhammad Asraf (F/Q)	Peshawar / 2
33.	Abdul Basit S/O Jabir Hussain (D/Q)	Peshawar / 2
34.	Saman Zia D/O Zia Mohi ud din (F/Q)	Peshawar / 2
35.	Saeed Azam S/O Amir Azim Khan	Chitral / 3
36.	Fawad Khan S/O Faqir Muhammad	Hajaur Agy / 1
37.	Muhammad Rashid S/O Fazil Subhan	Dir Lower / 3
38.	Axad Ali S/O Munir Khan	Mohmand Agency / 1
39.	Hassan Wazir S/O Pinda Khan	FR Hanna / 1
40.	Shahzeb Khan S/O Gul Baddah	Mohmand / 1
41.	Mohammad-Farooq S/O Maza Ullah Khan	Mohmand Agency / 1
42.	Fida Ali S/O Mauli Khan	Chitral / 3
43.	Rehar Lillah S/O Hameed Ullah	Dir Lower / 3
44.	Amjad Khan S/O Qubad Khan	Swat / 3
45.	Mansoor Ahmad S/O Shereen Muhammad	Swat / 3
46.	Faizullah S/O Hidayat Ullah	Chitral / 3
47.	Syed Saadiq Hussain S/O Dada Jan	Chitral / 3
48.	Twahah Shah D/O Zahir Shah (F/Q)	Nowshera / 2

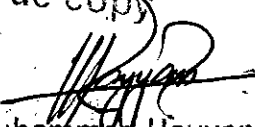
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Muhammad Hayyan
Advocate High Court
District Courts Mardan

17.	Anees Ur Rehman S/O Hashir Ahmad	Karak / 4
18.	Yousaf Khan S/O Amir Saad	Peshawar / 2
19.	Asif Ullah S/O Naseer Ahmad	Charsadda / 2
20.	Muhammad Shoaib S/O Muhammad Zahoor	Abbottabad / 5
21.	Usman Ullah S/O Muhammad Rashid	Chitral / 3
22.	Muhammad Waqar S/O Ibrahim Khan	Karak / 4
23.	Zahoor Ahmad S/O Aurang Zeb	Abbottabad / 5
24.	Khuram Saqib S/O Muhammad Saqib	Manselara / 5
25.	Syed Inam Ali Shah S/O Syed Shah Nawaz Hussain Shah	Haripur / 5
26.	Khair Ur Rehman S/O Muhammad Gul	Charsadda / 2
27.	Rozee D/O Muhammad Shamraiz	Abbottabad / 5
28.	Faryal Zaman D/O Mir Zaman	Dir Lower / 3
29.	Imtiaz Ahmad S/O Noor Khan	Mohmand Agency / 1
30.	Hilal Nawaz S/O Muhammad Nawaz	Manselara / 5
31.	Israt Ullah Jan S/O Hakim Khan	Dajaur Agy / 1
32.	Khanat Ahsraf D/O Muhammad Asiraf (F/Q)	Peshawar / 2
33.	Abdul Basir S/O Jabir Hussain (D/Q)	Peshawar / 2
34.	Saman Zia D/O Zia Mohi ud din (F/Q)	Peshawar / 2
35.	Sawar Azam S/O Amir Azim Khan	Chitral / 3
36.	Fawad Khan S/O Faqir Mohammad	Dajaur Agy / 1
37.	Muhammad Rashid S/O Fayli Subhan	Dir Lower / 3
38.	Axad Ali S/O Mumtaz Khan	Mohmand Agency / 1
39.	Hassan Wazir S/O Pinda Khan	FR Hanna / 1
40.	Shahzeb Khan S/O Gul Badshah	Mohmand / 1
41.	Mohammad-Farooq S/O Mazo Ullah Khan	Mohmand Agency / 1
42.	Fida Ali S/O Mauli Khan	Chitral / 3
43.	Rahat Ullah S/O Hameed Ullah	Dir Lower / 3
44.	Amjad Khan S/O Qubad Khan	Swat / 3
45.	Mansoor Ahmad S/O Shereen Muhammad	Swat / 3
46.	Fariqullah S/O Hidayat Ullah	Chitral / 3
47.	Syed Saadiq Hussain S/O Dada Jan	Chitral / 3
48.	Twahhah Shah D/O Zahir Shah (F/Q)	Nowshera / 2


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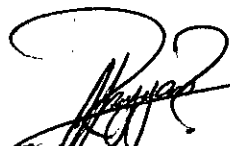
Muhammad Hayyan
Advocate High Court
District Courts Mardan

49.	Hameed Ullah S/O Haider Khan	Bajaur Agy / 1
50.	Adnan Khan S/O Hafiz Ur Rahmat	Dir Upper / 3
51.	Asad Ullah Khan S/O Mumtaz Khan	Mohmand Agency / 1
52.	Muhammad Sharif S/O Muhammad Nawaz Khan	Bajaur Agy / 1
53.	Muhammad Kabir S/O Gul Janan	Orakzai Agency / 1
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.	Sohny bibi D/O Muhammad Nawaz (F/Q)	Dir Lower/3
57.	Saman Imad D/O Shabir Ahmad (F/Q)	Charsadda/2
58.	Arfa Batool D/O Mushtaq Hussain (F/Q)	DI Khan/4
59.	Khushboo D/O Zafar Saleem (F/Q)	Peshawar/2
60.	Sanam Sarwar D/O Sarwar Qamar (M/Q)	Swabi/2
61.	Nirdosh Nazir S/O Nazir Akhtar (M/Q)	Peshawar/2
62.	Joshua Jacob S/O Justin Jacob (M/Q)	Peshawar/2
63.	Martha Boota D/O Boota Masih (M/Q)	Peshawar/2

Yours Sincerely,


(SAJJAD RAZA)
ASSISTANT DIRECTOR-IV

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Muhammad Hayyan
Advocate High Court
District Courts Mardan

091-0213750, 0213503
203

Website : www.bps.gov.pk



KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION

2-Fort Road, Peshawar Cantt.
No. PSC/SR-VIII/ 023984

Dated: 04/04/2022

~~330~~ 209
⑪

To,

The Secretary to Khyber Pakhtunkhwa
Finance Department, Peshawar.

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

Dear Sir,

→ PG-9/C

1. 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 their inter-se-merit and thereafter as per your request sent inter-se-merit of entire selectees on 10.01.2022 (copy enclosed) as per merit. The observations and the rules of Esta code quoted therein, pertain to promotion cadres, and not initial recruitment.

2. 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

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true copy

Muhammad Hayyan
Advocate High Court
District Courts Mardan

WF-A&R

Date: 27/04/2022

OFFICE OF THE SECRETARY
FINANCE DEPARTMENT
PESHAWAR

091-9210750, 9213563

203

Website : www.psc.gov.pk



KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION

2-Fort Road, Peshawar Cantt.

No. PSC/SR-VIII/ 023984

Dated: 04/04/2022

(330) 249
⑪

To.

The Secretary to Khyber Pakhtunkhwa
Finance Department, Peshawar.

Subject: Reservation and objection regarding the Seniority of Auditor
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→ pg-9/C

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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 copy

Muhammad Hayyan
Advocate High Court
District Courts Mardan

Handwritten marks and signatures at the bottom of the page, including "WF-A&R" and "11..h1".

DIRECTORATE OF LOCAL FUND AUDIT
KHYBER PAKHTUNKHWA,
PESHAWAR.

Dated Peshawar the 22/04/2022

NOTIFICATION

No. LFA/ESTT:/S.L/2020/ 1226-1332 In pursuance of Sub-section (I) of Section 8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (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.

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

S. No	Name	Qualification	Date of Passing the SAS Exam	Domicile	Date of Birth	Date of Entry into Govt.	Date of appointment to present post	Method of recruitment/ appointment	Place of present posting
1	Mr. Abdul Rashid	B.A	-	Karak	04-01-1964	01-09-1996	01-09-1996	Initial Recruitment	TMA, B.D Shah
2	Mr. Shakil Arshad	M.A	-	Peshawar	12-04-1970	01-09-1996	01-09-1996	Initial Recruitment	Text Book Board Peshawar
3	Mr. Muhammad Shah	D.COM	-	Mardan	12-02-1962	25-04-1992	03-12-2001	By Promotion	TMA, Takht Bhai
4	Mr. Noor Payo Jan	F.A	-	Karak	05-08-1968	28-10-1992	03-12-2001	By Promotion	TMA, Gumbat
5	Mr. Syed Tayyab Ali Shah	B.A	-	Buner	13-04-1968	28-10-1992	23-08-2002	By Promotion	TMA, Town-II, Peshawar
6	Mr. Muhammad Salim	D.COM	-	Abbottabad	01-07-1967	27-06-1995	17-01-2003	By Promotion	DIAC, DC Office Abbottabad
7	Mr. Isayatullah	M.B.A	-	D.I Khan	10-04-1973	29-04-2006	29-04-2006	Initial Recruitment	TMA, Pzrova
8	Mr. Nasir-Ij-d-Din	M.COM	-	Chitral	02-03-1974	19-02-2007	19-02-2007	Initial Recruitment	TMA, Masruj
9	Mr. Ijaz Ahmad	MBA	-	Abbottabad	11-01-1980	15-02-2007	15-02-2007	Initial Recruitment	TMA Haripur
10	Mr. Muhammad Matloob	B.COM	-	Mansehra	16-04-1979	03-03-2007	03-03-2007	Initial Recruitment	TMA, Mansehra
11	Mr. Muhammad Asad Yar Khan	B.COM	-	Haripur	13-10-1983	26-02-2007	26-02-2007	Initial Recruitment	DIAC, LG&RDD
12	Mr. Shakil Ahmed	B.COM	-	Peshawar	23-03-1978	23-05-2008	23-05-2008	Initial Recruitment	Headquarter
13	Mr. Asad Khan	MA Economics	-	FR Peshawar	01-03-1980	23-05-2008	23-05-2008	Initial Recruitment	Local Council Board Pesh

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[Signature]
Muhammad Hayyan
Advocate High Court
District Courts Mardan

(13)

S.No	Name	Qualification	Passing the SAS Exam	Domicile	Date of Birth	Date of Entry into Govt.	Appointment to present post	recruitment appointment	Place of present posting
36	Mr. Asim Zia	DBA (HONS) MS & SAS	15-01-2018	Nowshera	02-09-1987	17-12-2013	17-12-2013	Initial Recruitment	TMA, Nowshera
37	Mr. Hafiz Muhammad Naveed	MBA (Finance) & SAS	18-04-2017	Charsadda	20-02-1989	17-12-2013	17-12-2013	Initial Recruitment	TMA, Shabqadar
38	Mr. Rashid Khan	MBA & SAS	15-01-2018	Mohmand Agency	25-12-1986	20-12-2013	20-12-2013	Initial Recruitment	DIAC, Food Deptt
39	Mr. Muhammad Farhad	M.Sc	-	Malakand	20-02-1985	17-12-2013	17-12-2013	Initial Recruitment	TMA, Swat Bahawal
40	Mr. Shahid Khan	DBA(Hons)	-	Charsadda	11-02-1985	27-12-2013	27-12-2013	Initial Recruitment	DIAC, Agriculture
41	Mr. Zafar Ali	MBA	-	Swat	07-06-1987	18-12-2013	18-12-2013	Initial Recruitment	DIAC, DC Swat
42	Mr. Kafimullah	BBA (IT)	-	Dir	25-04-1987	17-12-2013	17-12-2013	Initial Recruitment	TMA, Dir Upper
43	Mr. Nasir Farooq	B.COM	-	Manshera	09-01-1989	19-12-2013	19-12-2013	Initial Recruitment	TMA, Battagram
44	Mr. Zia Farman	MBA & SAS	18-04-2017	Abbottabad	27-06-1986	19-12-2013	19-12-2013	Initial Recruitment	TMA, Haripur
45	Mr. Asifullah	M.Sc	-	Peshawar	01-06-1981	17-04-2003	30-12-2013	By Promotion	TMA, Town-II, Peshawar
46	Mr. Israr ud Din	F.A	-	Peshawar	08-09-1972	09-03-2006	03-02-2016	By Promotion	TMA, Town-I, Peshawar
47	Mr. Hareem Shah	BA	-	Charsadda	05-12-1986	07-03-2008	03-02-2016	By Promotion	TMA Charadda
48	Mr. Mohammad Jabir Ahmad	M.Com	-	Peshawar	12-12-1982	17-06-2009	03-02-2016	By Promotion	Headquarter
49	Mr. Hameedullah-I	BA	-	Charsadda	05-04-1977	12-04-2010	06-03-2019	By Promotion	TMA, Town-I, Peshawar
50	Mr. Ghufra Ullah	B.Com	-	Karak	15-04-1992	01-06-2020	01-06-2020	Initial Recruitment	TMA Derael Bannu
51	Mr. Ghufra Ullah	B.Com	-	Karak	15-04-1992	01-06-2020	01-06-2020	Initial Recruitment	TMA Buner Swat
52	Mr. Sikandar Shah	BS Hons(Finance)	-	Mardan	03-09-1991	01-06-2020	01-06-2020	Initial Recruitment	DIAC, Higher Education Deptt
53	Mr. Hamid Faisal	BS Economics	-	Karak	01-09-1992	01-06-2020	01-06-2020	Initial Recruitment	DIAC, Industries
54	Mr. Farooq Zaman	B.Sc Hons (Economics)	-	Nowshera	08-03-1990	01-06-2020	01-06-2020	Initial Recruitment	IAC, District Bannu
55	Mr. Numan Ali Shah	M.Com	-	Bannu	07-03-1992	01-06-2020	01-06-2020	Initial Recruitment	TMA Jehangir
56	Mr. Shahid Ahmad	M.Com	-	Mardan	04-04-1989	01-06-2020	01-06-2020	Initial Recruitment	TMA Jehangir
56	Mr. Mian Azeem Rahman Khan	BS Economics	-	Nowshera	01-04-1995	01-06-2020	01-06-2020	Initial Recruitment	TMA Nowshera
57	Mr. Ijaz Ullah	MBA	-	Peshawar	31-01-1987	01-06-2020	01-06-2020	Initial Recruitment	Headquarter

S.No	Name	Qualification	Date of Passing the SAS Exam	Domicile	Date of Birth	Date of Entry into Govt.	Date of Appointment to present post	Method of recruitment/ appointment
82	Mr. Ikram Ullah	M.Com	-	Peshawar	15-02-1990	01-06-2020	01-06-2020	Initial Recruitment
83	Mr. Muhammad Azam Khan	MBA	-	Bannu	15-02-1993	01-06-2020	01-06-2020	Initial Recruitment
84	Mr. Sikander Ali	BBA (Hons)	-	D-I Khan	19-10-1994	01-06-2020	01-06-2020	Initial Recruitment
85	Mr. Sohail Muhammad	M.Com, MS & MSc Economics)	-	Mardan	20-03-1988	01-06-2020	01-06-2020	Initial Recruitment
86	Mr. Naveed Ahmad Khan	MBA	-	Bannu	01-03-1989	01-06-2020	01-06-2020	Initial Recruitment
87	Mr. Johar Zaman Abbasi	MBA	-	Abbottabad	11-12-1989	01-06-2020	01-06-2020	Initial Recruitment
88	Mr. Anves Ur Rehman	MBA	-	Karak	23-03-1991	01-06-2020	01-06-2020	Initial Recruitment
89	Mr. Yousof Khan	M.Com	-	Peshawar	15-09-1983	01-06-2020	01-06-2020	Initial Recruitment
90	Mr. Asif Ullah Jan	M.Com	-	Charsadda	10-04-1992	27-08-2020	27-08-2020	Initial Recruitment
91	Mr. Muhammad Shoaib	M.Com/MS	-	Abbottabad	29-06-1989	01-06-2020	01-06-2020	Initial Recruitment
92	Mr. Usman Ullah	B.Com	-	Chitral	06-08-1996	01-06-2020	01-06-2020	Initial Recruitment
93	Mr. Muhammad Waqar	MBA	-	Karak	01-04-1991	27-08-2020	27-08-2020	Initial Recruitment
94	Mr. Zaheer Ahmad	M.Com	-	Abbottabad	10-04-1990	01-06-2020	01-06-2020	Initial Recruitment
95	Mr. Khuram Saqib	MBA	-	Manselira	01-01-1993	01-06-2020	01-06-2020	Initial Recruitment
96	Mr. Syed Imran Ali Shah	B.Com	-	Hari Pur	16-05-1988	01-06-2020	01-06-2020	Initial Recruitment
97	Miss. Rozar	M.Com	-	Abbottabad	07-10-1991	01-06-2020	01-06-2020	Initial Recruitment
98	Mrs. Faryal Zaman	MS	-	Mardan	18-12-1988	01-06-2020	01-06-2020	Initial Recruitment
99	Mr. Imtiaz Ahmad	MBA, MS & MSc (Eco)	-	Mohmand Agency	25-03-1991	01-06-2020	01-06-2020	Initial Recruitment
100	Mr. Bilal Nawaz	M.Com	-	Manselira	02-11-1995	01-06-2020	01-06-2020	Initial Recruitment
101	Mr. Ismat Ullah Jan	M.Com	-	Bajaur	12-02-1996	01-06-2020	01-06-2020	Initial Recruitment
102	Mr. Sarwar Azeem	M.Com	-	Chitral	04-02-1986	01-06-2020	01-06-2020	Initial Recruitment
103	Mr. Farwad Khan	MBA	-	Baluch	01-01-1987	01-06-2020	01-06-2020	Initial Recruitment

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Muhammad Hayyan
Advocate High Court
District Courts Mardan

(5)

S.No	Name	Qualification	Date of Passing the SAS Exam	Domicile	Date of Birth	Date of Entry into Govt.	Date of Appointment to present post	Initial of recruitment/ Appointment
104	Mr. Muhammad Rashad	MBA	-	Dir Lower Mohmand Agency	04-05-1983	01-06-2020	01-06-2020	Initial Recruitment
105	Mr. Asad Ali	M.Com	-	FR Bararu Mohmand Agency	14-02-1989	01-06-2020	01-06-2020	Initial Recruitment
106	Mr. Hassan Wazir	MBA, MS & MA(Political Science)	-	FR Bararu Mohmand Agency	16-02-1988	01-06-2020	01-06-2020	Initial Recruitment
107	Mr. Shahzeb Khan	M.S	-	Chitral	09-07-1988	01-06-2020	01-06-2020	Initial Recruitment
108	Mr. Fida Ali	Bachelor in Business Studies	-	Dir Lower Swat	16-12-1994	01-06-2020	01-06-2020	Initial Recruitment
109	Mr. Rahat Ullah	B.Com	-	Swat	20-09-1995	01-06-2020	01-06-2020	Initial Recruitment
110	Mr. Amjad Khan	BBA (Hons)	-	Swat	05-03-1987	01-06-2020	01-06-2020	Initial Recruitment
111	Mr. Mansoor Ahmad	M.S	-	Chitral	17-08-1987	01-06-2020	01-06-2020	Initial Recruitment
112	Mr. Farid Ullah	M.Com	-	Chitral	10-02-1985	01-06-2020	01-06-2020	Initial Recruitment
113	Mr. Syed Saadiq Hussain	MBA	-	Bajaur	10-01-1993	01-06-2020	01-06-2020	Initial Recruitment
114	Mr. Hameed Ullah-II	M.Com	-	Dir Upper Mohmand Agency	10-11-1994	01-06-2020	01-06-2020	Initial Recruitment
115	Mr. Adnan Khan	B.Com	-	Chitral	05-02-1997	01-06-2020	01-06-2020	Initial Recruitment
116	Mr. Asad Ullah Khan	MBA	-	Chitral	18-05-1991	01-06-2020	01-06-2020	Initial Recruitment

Ends; No & date even.
 Copy forwarded to:
 1. The Section Officer (Estt-II), Finance Department Government of Khyber Pakhtunkhwa.
 2. All Concerned.

[Signature]
 DIRECTOR
 LOCAL FUND AUDIT,
 KHYBER PAKHTUNKHWA,
 PESHAWAR.

[Signature]
 DIRECTOR
 LOCAL FUND AUDIT
 KHYBER PAKHTUNKHWA,
 PESHAWAR.

Attested to be
 true copy

[Signature]
 Muhammad Hayyan
 Advocate High Court
 District Courts Merdan

(7-7)

(Annex - M)

To

[Handwritten signature]
18/1/22

The Director
Local Fund Audit
Directorate of Local Fund Audit
Khyber Pakhtunkhwa

Subject:

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.

Respected Sir,

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

- 1 THE KHYBER PAKHTUNKHWA CIVIL SERVANTS ACT, 1973. [KHYBER PAKHTUNKHWA] ACT NO. XVIII OF 1973
- 2 KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION (AMENDMENT) ORDINANCE, 2002 (KHYBER PAKHTUNKHWA ORDINANCE XXVII OF 2002) vide NOTIFICATION NO. KP/PSC/ 41094 A.

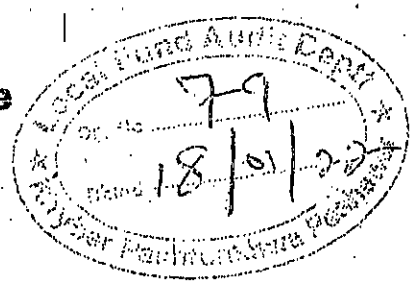
The respective rules from the act and notification are quoted below:

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

Attested to be true



[Handwritten signature]
Muhammad Hayyan
Advocate High Court
District Courts Mardan

Attested
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Attested
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(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-se seniority 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. (Adv: No. 03/2018, S. No. 49) and Auditors (BPS-14) (M/Q) +(Disabled Quota) In Local Fund Audit, Finance Department. (Adv: 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. (Adv: 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. (Adv: 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. (Adv: 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.

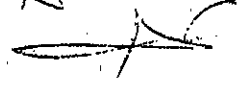
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 Muhammad Hayyan
 Advocate High Court
 District Courts Mardan

Attested



Attested



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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.

Yours Sincerely,

All the Auditor BPS-14 (Female Quota, MQ and Dissable Quota)

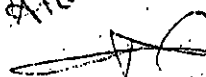
Dated: 17th January, 2022

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

Attested



Attested



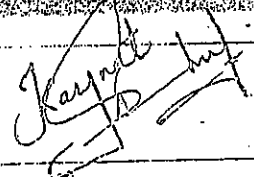
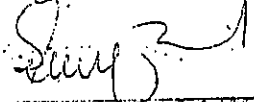
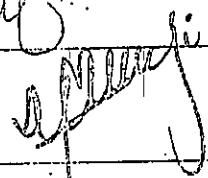
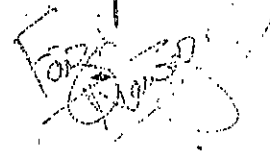
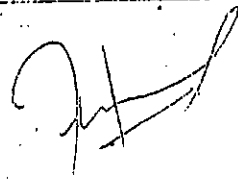
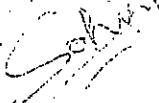
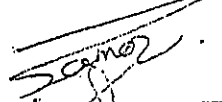
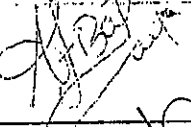


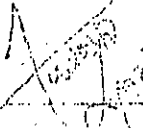
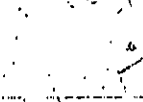
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Muhammad Hayyan
Advocate High Court
District Courts Mardan

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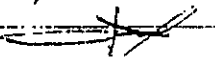
S.No	NAME WITH FATHER NAME	DISTRICT / ZONE	SIGNATURES
1	Kainat Ashraf D/O Muhammad Ashraf	Peshawar/ 2	
2	Saman Zia D/O Zia Mohi Ud Din	Peshawar/ 2	
3	Twahah Shah D/O Zahir Shah	Nowshera/ 2	
4	Faiza Nawaz D/O Syed Amir Nawaz	Gadoon Swabi/3	
5	Tamanna Bibi D/O Muhammad Akram Shah	Mardan/ 2	
6	Sohny Bibi D/O Muhammad Nawaz	Dir Lower/ 3	
7	Saman Imad D/O Shabir Ahmad	Charsadda/ 2	
8	Arfa Batool D/O Mushtaq Hussain	DI Khan/ 4	
9	Khushboo D/O Zafar Saleem	Peshawar/ 2	
10	Sanam Sarwar D/O Sarwar Qamar	Swabi/2	
11	Nirdosh Nazir S/O Nazir Akhtar	Peshawar/2	
12	Joshua Jacob S/O Justin Jacob	Peshawar/2	

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Muhammad Hayyan
Advocate High Court
District Courts Mardan

Attested



Attested


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13	Martha Boota D/O Boota Masih	Peshawar/2	<i>Martha Boota</i>
14	Abdul Basit S/O Jabir Hussain	Peshawar/2	<i>Abdul Basit</i>

Attested

[Signature]

Attested

[Signature]

Attested to be true copy

[Signature]

Muhammad Hayyan
Advocate High Court
District Courts Mardan

To.

The Director,
Local Fund Audit,
Khyber Pakhtunkhwa.

Subject: 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 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.

Rule 17 (1) (a) of Part (IV) of CIVIL SERVANTS (SENIORITY) RULES 1993 provided by kppsc vide letter No.PSC/SR-VIII/023984 Dated 04/04/2022 Annex-E) which clearly states that, "The seniority inter se of civil servants⁵⁵ (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 commission⁵⁶ [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

Yours sincerely,
All the Auditors BPS-14
(Female, minority and Disable) quota
Local Fund Audit,
Peshawar

Attested

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22

(Annex-P)

To,

The Secretary,
Finance Department
Khyber Pakhtunkhawa.

Through: The Director,
Local Fund Audit,
Khyber Pakhtunkhwa.

Subject: 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 redressal of our grievances.

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

Yours sincerely,

All the Auditors BPS-14

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

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Muhammad Hayyan
Advocate High Court
District Courts Mardan

Attested

Attested

Recd
AP
31/3/22



(76) (23)
DIRECTORATE OF LOCAL FUND AUDIT
KHYBER PAKHTUNKHWA,
PESHAWAR

NO.LFA/Estt./Recruitment/2020/ 2495-97
Dated Peshawar the 26 / 09 / 2022

To

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

(Annex - 2)

Subject: 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.

Attested to

Attested to be
true copy

Muhammad Hayyan
Advocate High Court
District Courts Mardan



DIRECTORATE OF LOCAL FUND AUDIT
KHYBER PAKHTUNKHWA,
PESHAWAR

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NO.LFA/Estt/Recruitment/2020/ 1695-96
Dated Peshawar the 21/10/2021

To

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

Subject:

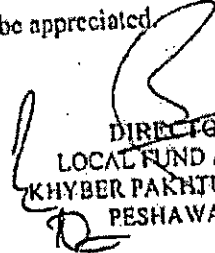
REQUEST FOR ISSUANCE OF INTER-SE-SENIORITY/MERIT
LIST OF NEWLY RECRUITED AUDITORS (GENERAL,
FEMALE, MINORITY AND DISABLE) QUOTA IN
DIRECTORATE OF LOCAL FUND AUDIT (FINANCE
DEPARTMENT) ADV NO.03/2018 S.NO.48, 49, 50, 51.

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-VII/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. 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 please.

An early action in this regard will highly be appreciated


DIRECTOR
LOCAL FUND AUDIT,
KHYBER PAKHTUNKHWA,
PESHAWAR.

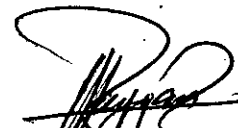
Endst; No & date even.

Copy forwarded to:

1. The Director Recruitment Khyber Pakhtunkhwa Public Service Commission, Peshawar is also requested for subject matter please.


DIRECTOR
LOCAL FUND AUDIT,
KHYBER PAKHTUNKHWA,
PESHAWAR.

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true copy


Muhammad Hayyan
Advocate High Court
District Courts Mardan



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

163

25

Finance Department, Civil Secretariat, Peshawar

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finance.gkp.govt

NO:SO(ESTT-II)FD/3-14/2013/LFA

Dated: 29-10-2021

To



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.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:-

1. Director, Local Fund Audit, Khyber Pakhtunkhwa Peshawar with reference to his letter No quoted above.
2. PS to Addl: Secretary (Admn), Finance Department.
3. Officer order file.

1768
03/11/21

Section Officer(Estt-II)

A/O
30/11/21
Estt
3/11

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Muhammad Hayyan
Advocate High Court
District Courts Mardan



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

163

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Finance Department, Civil Secretariat, Peshawar | finance.gkp.pk | financepgovt | financepgovt

NO:SO(ESTT-II)FD/3-14/2013/LFA

Dated: 29-10-2021

To



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.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:-

1. Director, Local Fund Audit, Khyber Pakhtunkhwa Peshawar with reference to his letter No quoted above.
2. PS to Addl. Secretary (Admn), Finance Department.
3. Officer order file.

1768
03/11/21

Section Officer(Estt-II)

A/o
31/11/21
Estt
3/11

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Muhammad Hayyan
Advocate High Court
District Courts Mardan



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

155 (26)

Finance Department Civil Secretariat Peshawar

<http://www.finance.gkp.pk>

[facebook.com/GoKPF/D](https://www.facebook.com/GoKPF/D)

twitter.com/GoKPF/D

No: SO(Estt-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).

I am directed to refer to your letter No. 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 vide 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:-

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

Section Officer (Estt-II)

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Muhammad Hayyan
Advocate High Court
District Courts Mandar



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

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Finance Department Civil Secretariat Peshawar | <http://www.gkp.gov.pk> | Facebook: govPK | Twitter: govPKFD
No. SO (ESTT-II)/FD/3-14/2022/Recruitment/LFA Dated Pesh: the 21.06.2022

To

The Secretary to Khyber Pakhtunkhwa,
Establishment Department

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

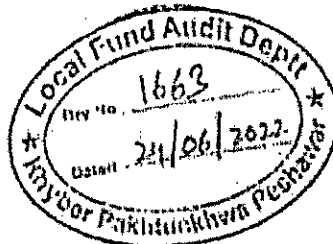
Dear Sir,

I am directed to refer to the Subject noted above and to state that Auditors (BS-14) recruited by Khyber Pakhtunkhwa 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 quota 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 stood 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 (Estt-II)

Encl: No. & Date oven.
Copy forwarded for information to:-

1. The Director Local Fund Audit, Khyber Pakhtunkhwa.
2. PS to Secretary, Finance Department.
3. PA to Additional Secretary (Admn), Finance Department.

23/6

EQA 23/6

Attested to be true copy

M. B. Khan 22/6/22
Section Officer (Estt-II)

Muhammad Hayyan
Advocate High Court
District Courts Mardan

MINUTES OF THE MEETING HELD ON 06-02-2023

SUBJECT: OBSERVATIONS / OBJECTIONS ON TENTATIVE SENIORITY LISTS AS STOOD ON 31-12-2022

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, Peshawar to discuss the subject issue. The following attended the meeting.

1. Mr. Fida Hussain, Deputy Director
2. Mr. Atta-ur-Rahman, Assistant Director
3. Mr. Inayat-ur-Rahim, Audit Officer.
4. Mr. M. Jabir Ahmad, Auditor (E&A)

[Handwritten initials]

The Chairman 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.

1. OBSERVATION / OBJECTION OF MR. MUSADDIQ ZIKRIA ON TENTATIVE SENIORITY LIST OF JUNIOR CLERKS AS STOOD ON 31-12-2022

[Handwritten initials]

Two posts of Junior Clerks became 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. Musaddiq 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.

Particulars	Mr. Sahibzada Arshad Mehmood	Mr. Musaddiq Zikria
Date of Birth	01-08-1977	16-11-1993
Date of Appointment	02-01-2012 as Daftari	31-03-2022 as Junior Clerk
Length of service	09-years as Daftari	Initial Appointment
Date of occurrence of Vacancy	08-03-2022	08-03-2022
Right Established for promotion / appointment	02-01-2014 (ie 2-years service as daftari for promotion as per service rules of LFA)	20-01-2021
Date of Promotion to Junior Clerk	31-03-2022	Initial Appointment

Mr. Musaddiq Zikria raised objection on the seniority list of junior clerks and requested that he may be placed senior from Mr. Sahibzada 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. Aif 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.

Attested to be true copy

[Signature]
Muhammad Hayyan
Advocate High Court
District Courts Mardan

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

"Seniority in various cadres of civil servants appointed by initial recruitment vis-a-vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person 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 lower posts, carrying 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 of two or more civil servants in the lower post is the same, the civil servant older in age, shall be treated senior."

2. 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 Pakhtunkhwa Public Service Commission vide 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 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 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.

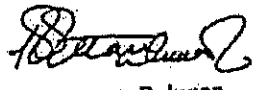
Decision: After thorough examination of the case, the committee decided that Rule 17 (1)(a) of Part-VI of the Civil Servants (Appointment, Promotion and Transfer Rules, 1989) and the Khyber Pakhtunkhwa Services Commission advice dated 04-04-2022 on the subject issue is quite clear. As the Commission 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 seniority assigned on merit by the Commission being mandate of the Public Service Commission.

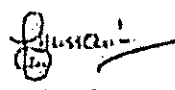
Rule 17 (1) (a) "The seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission or as the case may be, the Departmental Selection Committee; provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection;

The meeting ended with the vote of thanks.



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


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

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Muhammad Hayyan
Advocate High Court
District Courts Mardan

Islamabad, the 28th February, 1993

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CIVIL SERVANTS (SENIORITY) RULES, 1993.

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

1. Short title, application and commencement.— (1) These rules may be called 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 23rd January, 1974, amended vide O.M No.2/1/75.ARC dated 3rd March, 1976, and as amended from time to time.

(3) They shall come into force at once.

2. Seniority on initial appointment.—(1) Persons initially appointed on the recommendations of the selection authority through an earlier open advertisement shall rank senior 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
- (b) the date of his joining the post after being recommended by the selection authority, if he was not already holding the same post.

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Muhammad Hayyan
Advocate High Court
District Courts Mardan

34. RECOMMENDATIONS

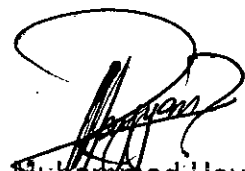
- (a) ⁵⁴[A decision about recommendations to be made shall be approved by the Members of Interview Panel concerned, the Member incharge of the subject and the Chairman]. Merit list shall be uploaded on website of the Commission. After approval, the Director concerned shall also convey the recommendations 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

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

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.

- (b) ⁵⁵[Where the experience forms part of the requisite qualifications, the recommendations of in-service candidates shall be conveyed provisionally subject to perusal of their PERs by the Department concerned and finding these satisfactory.]
- (c) At the time of advertisement, separate serial numbers and sub-serial number shall be given to each subject. ⁵⁶[serial-wise / sub serial-wise] recommendations alongwith inter-se-seniority shall also be conveyed to the department.
- (d) ⁵⁷[After selection/ recommendation, if any discrepancy is found in 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 disciplinary action based on the report of the Commission.

Attested to be true copy


 Muhammad Hayyan
 Advocate High Court
 District Courts Mardan

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

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



No. PSC/SR-VII/Auditor/2020/ 011776
Dated: 11/11 / 2020

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

Subject: **RECRUITMENT TO FORTY-NINE (49) POSTS OF AUDITOR
(B-14) IN DIRECTORATE OF LOCAL FUND AUDIT
(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.

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

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

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

Merit order	Name with Father Name	District/Zone
1.	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.	Hamid Faisal S/O Abdul Razid Khan	Karak / 4
5.	Farooq Zaman S/O Lal Zaman	Nowshera / 2
6.	Numan Ali Shah S/O Fayyaz Ali Shah	Bannu / 4
7.	Shahid Ahmad S/O Salar Ahmad	Mardan / 2
8.	Mian Ata Ur Rehman Khan S/O Mian Saif Ur Rahman	Nowshera / 2
9.	Ijaz Ul Haq S/O Saeed Ul Haq	Peshawar / 2
10.	Naeem Ahmed S/O Abdur Rahim	Haripur / 5
11.	Ikram Ullah S/O Abdullah	Peshawar / 2
12.	Muhammad Azam Khan S/O Muhammad Farooq Khan	Bannu / 4
13.	Sikander Ali S/O Syed Sher Shah	DI Khan / 4
14.	Sohail Muhammad S/O Gul Muhanimud	Mardan / 2
15.	Naveed Ahmad Khan S/O Rast Baz Khan	Bannu / 4
16.	Johar Zaman Abbasi S/O Dadi Uz Zaman Khan Abbasi	Abbottabad / 5
17.	Anees Ur Rehman S/O Bashir Ahmad	Karak / 4
18.	Yousaf Khan S/O Amir Saad	Peshawar / 2

Secretary
Khyber Pakhtunkhwa
D. No. 187/2020
Dated: 11/11/2020
16/11
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Muhammad Hayyan
Advocate High Court
District Courts Mardan

	h S/O Naseer Ahmad	Charsadda / 2
20.	Muhammad Shoaib S/O Muhammad Zahoer	Abbottabad / 5
21.	Imran Ullah S/O Muhammad Rashid	Chitral / 3
22.	Muhammad Waqar S/O Ibrahim Khan	Karnk / 4
23.	Zaheer Ahmed S/O Aurang Zeb	Abbottabad / 5
24.	Khuram Saqib S/O Muhammad Saqib	Mansohra / 5
25.	Syed Imran Ali Shah S/O Syed Shahnawaz Hussain Shah	Haripur / 5
26.	Khair Ur Rehman S/O Muhammad Gul	Charsadda / 2
27.	Rozee D/O Muhammad Shamraiz	Abbottabad / 5
28.	Faryal Zaman D/O Mir Zaman	Dir Lower / 3
29.	Imtiaz Ahmad S/O Noor Khan	Mohmand Agency / 1
30.	Bilal Nawaz S/O Muhammad Nawaz	Mansohra / 5
31.	Ismat Ullah Jan S/O Hukam Khan	Bajaur Agy / 1
32.	Sarwar 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 Khan	Mohmand Agency / 1
36.	Hassan Wazir S/O Pinda Khan	FR Bannu / 1
37.	Shahzeb Khan S/O Gul Badshah	Mohmand / 1
38.	Mohammad Farooq S/O Mazo Ullah Khan	Mohmand Agency / 1
39.	Fida Ali S/O Mauli Khan	Chitral / 3
40.	Rahat Ullah S/O Hameed Ullah	Dir Lower / 3
41.	Amjad Khan S/O Qubad Khan	Swat / 3
42.	Mansoor Ahmad S/O Shereen Muhammad	Swat / 3
43.	Faridullah S/O Hidayat Ullah	Chitral / 3
44.	Syed Sadiq Hussain S/O Dada Jan	Chitral / 3
45.	Hameed Ullah S/O Haider Khan	Bajaur Agy / 1
46.	Adnan Khan S/O Hafiz Ur Rahman	Dir Upper / 3
47.	Asad Ullah Khan S/O Mumtaz Khan	Mohmand Agency / 1
48.	Muhammad Sharif S/O Muhammad Nawaz Khan	Bajaur Agy / 1
49.	Muhammad Kabir S/O Gul Janan	Orakzai Agency / 1

5.

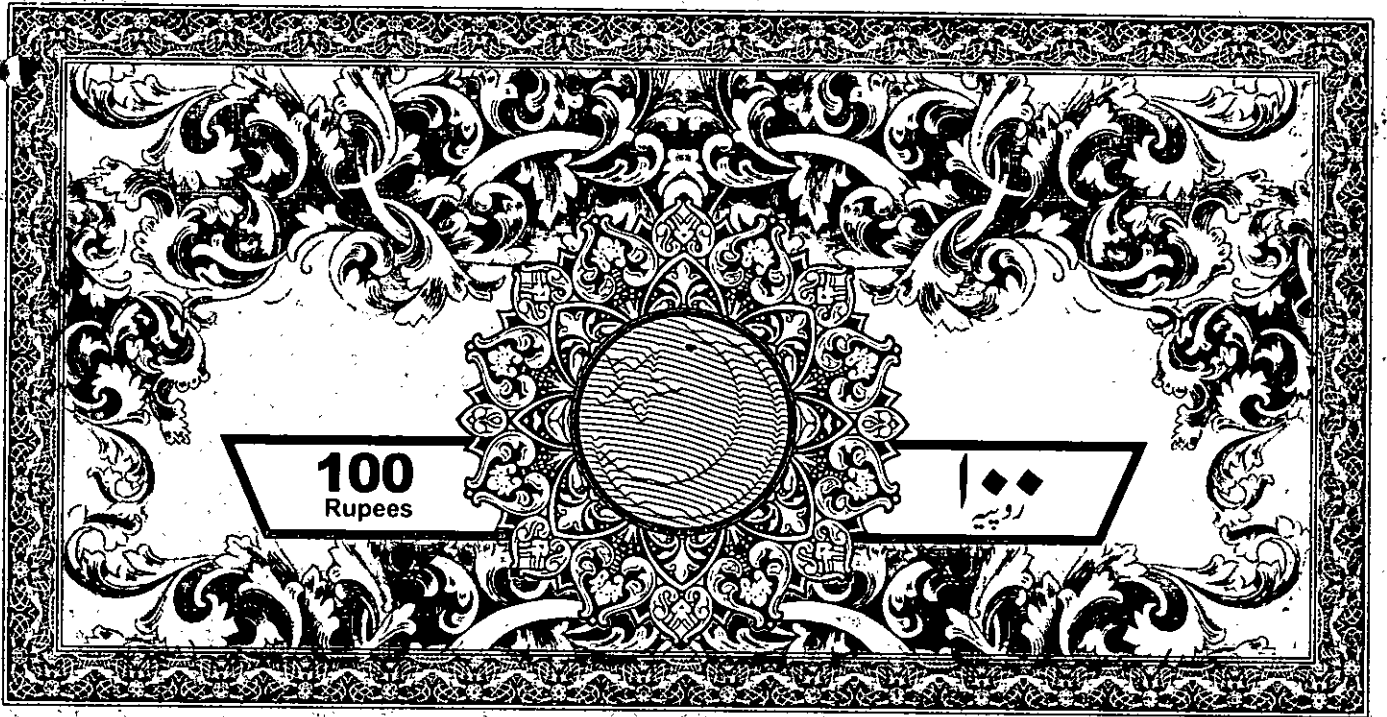
Kindly acknowledge receipt.

Attested to be true copy

Yours Sincerely,

(ILYAS SHAH) DIRECTOR RECRUITMENT

Advocate High Court District Courts Mardan



بعدالت جناب جسپر بخشونخواہ سرسوی، ٹرین سوتلی سٹاور

۴۴ سٹور _____ نام _____
 ڈائریکٹر کوئی فنڈ سٹور وغیرہ

مختیار نامہ خاص _____ دعویٰ سرسوی اپیل _____

اترار کر کے لکھ دیتا ہے۔ کہ مقدمہ بالا کی بیرونی سے بوجہ کاروبار دیگر مصروفیات سے بذات خود معذور ہوں۔ لہذا اپنی جانب سے کسی ضابطہ الحمدولہ سالانہ - سلطان شاہ ولد لعل محمد شاہ - کے ساتھ ساتھ کوئی مختیار خاص مقرر کر کے اختیار دیتا ہوں۔ کہ مختیار خاص دعویٰ مذکورہ کی بیرونی میری انجمنی جانب سے کریں۔ وکیل مقرر ہے۔ بیان تحریر پر تصدیق میری جانب سے کریں۔ اور اس کو داخل کریں۔ کاغذات یا دیگر ثبوت تحریری طلب کرائیں یا پیش کریں یا سوال و جواب کرے۔ صلح نامہ، راجسی نامہ، دست برداری یا اقبال دعویٰ دیں۔ یا اترار نامہ ثالثی داخل یا قبول کرے۔ دعویٰ، جواب دعویٰ، جواب اجواب، بیان دیوے، درخواست cpc (2) داخل کرے۔ درخواست منسوقی ڈگری اکاڈمی داخل کریں۔ اور اس پر دستخط کریں۔ بیان غلطی داخل کرے۔ یا دیگر درخواست کسی مضمون کی پیش کرے یا کوئی مطالبہ متعلقہ مقدمہ داخل کرے۔ یا واپس لے۔ مقدمہ میں اپیل نگرانی نظر ثانی، اپیل دراپیل، اس عدالت ماتحت تا عدالت عالیہ و عظمیٰ آف پاکستان دائر پیش کریں۔ اجراء داخل کرے۔ رقم وصول و داخل کرے۔ اور مقدمے کے سلسلے میں جو کارروائی ہو عمل میں لائیں۔ جملہ ساختہ و پراداختہ مختیار موصوف کا مثل کردہ ذات خاص اپنے کے قبول و منظور ہیں۔ لہذا مختیار نامہ ہذا مسترد تحریر ہے۔

نگواہ بنی

ال 7-604 7423 14202 عبہ

3/1/67
 27
 نگواہ بنی

محمد خالد ولد سید شاہ

غضنہ ان اللہ ولد غفل سید خان

فرخ ظہر ولد صوف خان

ساکن ٹرین سٹاور، طاہمہ سردان

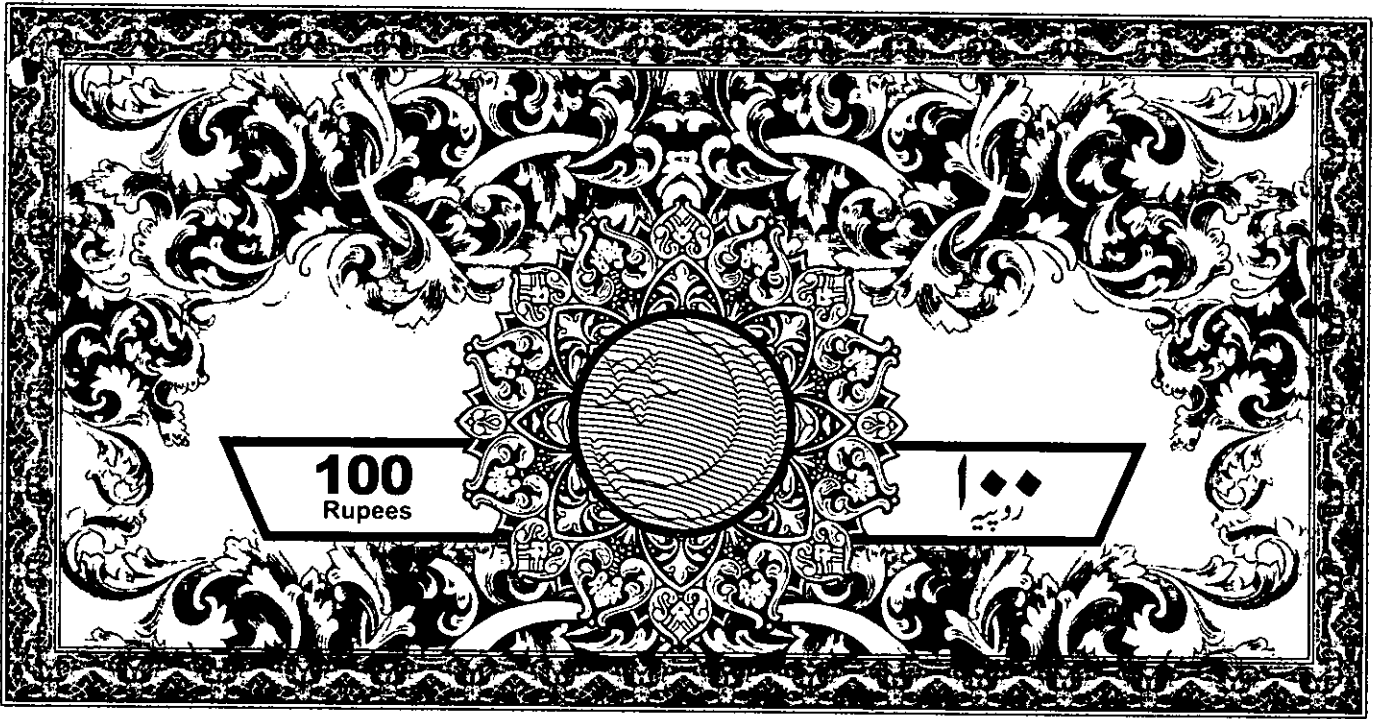
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Gyphar

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خالد

مکتوبہ



ال 5-3-0725623-11101 عبد
نعمان علی شاہ ولد فیاض علی شاہ
ساکنی کوئٹہ عبد القدیر شاہ بڈا میہ عباس بنوں

ال 1-401344-142032 عبد
حامد فصیل ولد عبد الرزاق خان
ساکنی ٹھہراب ضلعی تحصیل نوشہری کورٹ

ال 9-2203499-16101 عبد
سلیمان شاہ ولد کریم شاہ
ساکنی ماتبان پنجشائی مردان

ال 9-660800-17301 عبد
انجازه الحق ولد سعید الحق
ساکنی مسلم آباد چارخانہ رورہ شادور

ال 7-3705383-17201 عبد
سیان علیہ الرحمن ولد میان سیف الرحمن
ساکنی میان کلاں ضلعی بیٹیاور

ال 1-1926028-16102 عبد
شاہد احمد ولد اسلام احمد
بنو میر آسمان گل چغتائی گلگانی

ال 7-5551380-16101 عبد
سہیل محمد ولد گل محمد
ساکنی گلہ باغ ہوتی مردان

ال 9-1610327-11101 عبد
محمد اعظم خان ولد محمد فاروق خان
ساکنی نیشنل بازار بنوں

ال 9-9512613-17301 عبد
اکرام اللہ ولد عبد اللہ
ساکنی نوکا کشال وزیر باغ شادور

ال 9-96649339-13301 عبد
الیسی الرحمن ولد بشیر احمد
ساکنی صنوبر باغ سوسا کویٹہ

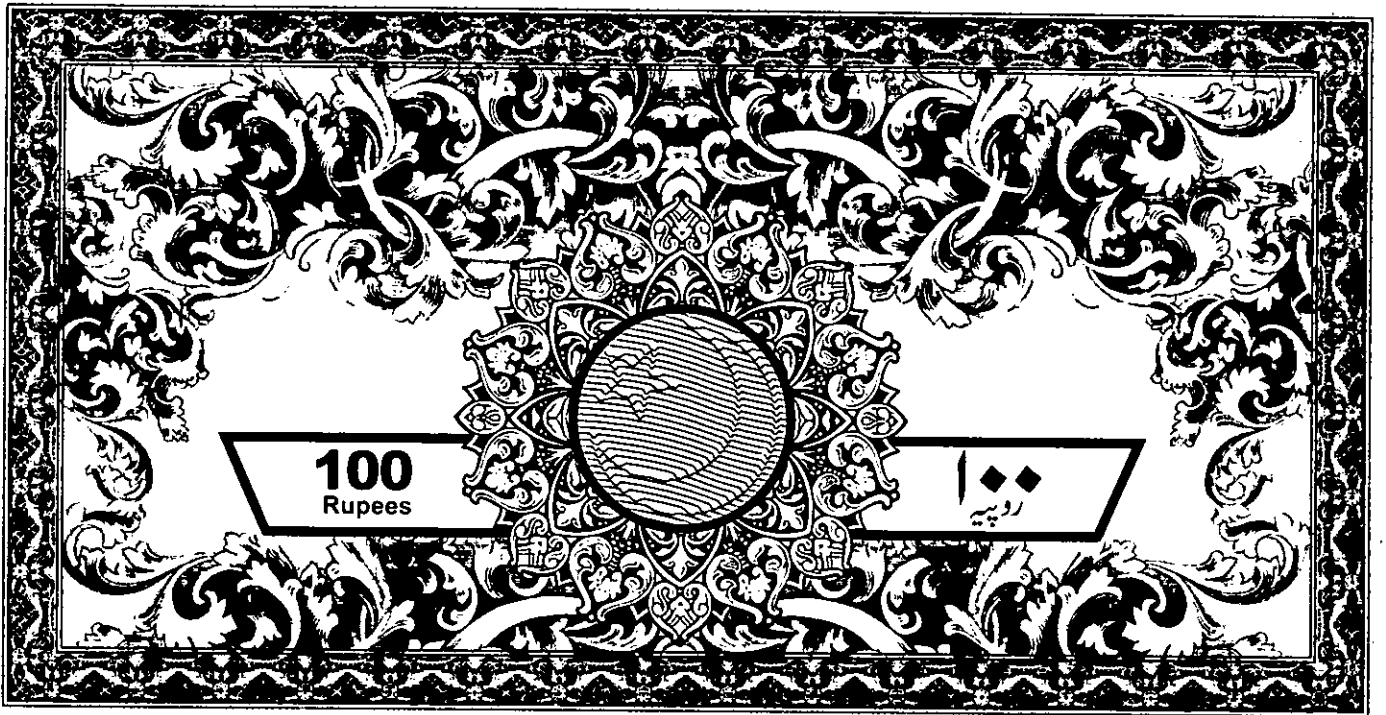
ال 5-2395662-61101 عبد
جوہر زمان عباسی ولد بدیع الزمان عباسی
ساکنی سٹیٹ ٹریڈ سیکٹر 10-1 اسلام آباد

ال 3-9627733-1101 عبد
نور احمد ولد راسخ باز خان
ساکنی اسماعیل ضلعی فاطمہ ضلعی بنوں

ال 9-6019315-13161 عبد
محمد شعیب ولد ظہور
ساکنی گلگندی لکھنؤ ایسٹ آباد

ال 2-17101-9972796 عبد
آصف اللہ جان ولد لہرام احمد
ساکنی کوئی ٹاکنی بیلہ چارمنڈ

ال 9-5930331-17301 عبد
یوسف خان ولد عامر سعید
ساکنی بلکہ ٹورٹ منشی آباد شادور



ال 9-1108088-15202 عبد

ظہیر احمد ولد اورنگزیب
سکین چونی علی آباد
ایبٹ آباد

ال 5-2038387-44203 عبد

عثمان اللہ ولد محمد رشید
سکین درکوب کشاگرہ
محمد دھار ولد ابرہیم خان
سکین ڈنگر والہ
11/08/11

ال 8-5334469-16101 عبد

سماء فسرہاں زویہ شاہ خان
سکین شیخ ملتان ماڈرن ہریانہ

ال 7-4854457-13101 عبد

سماء روزی زویہ نعیم اللہ ماہر
سکین فی اکھی پی باؤرند نوساکی
ایبٹ آباد

ال 5-8064725-13503 عبد

فریم نامق ولد محمد تاشا
سکین پنجاب پونہ روسی ٹاؤن 2
لاہور

ال 3-7002305-21103 عبد

عصمت اللہ جان ولد حکیم خان
سکین خار بلانی باجوڑ

ال 9-6828013-13503 عبد

بلال لواز ولد محمد نواز
سکین تھراکیاں چکھاہ روڈ مانسہرہ

ال 3-850585-214029 عبد

امتیاز احمد ولد نور خان
سکین علاقہ نجی غازی کور ایجنسی

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ال 3-2336314-17102 عبد

اسد علی ولد ممتاز خان
سکین منگی چارسدہ

ال 7-9463990-21103 عبد

نواد خان ولد قمر محمد
سکین حسرتانہ مور باجوڑ
Faisal

ال 9-8675699-15202 عبد

سردار سلیم ولد عامر افضل خان
سکین حصون منگی چارسدہ

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ال 3-7086958-15202 عبد

فدا علی ولد مولائی خان
سکین شامرام سوخا رستونج

ال 9-2576344-17201 عبد

شاہ زیب ولد گل بادشاہ
سکین سفید شہ روڈ گل آباد پشاور

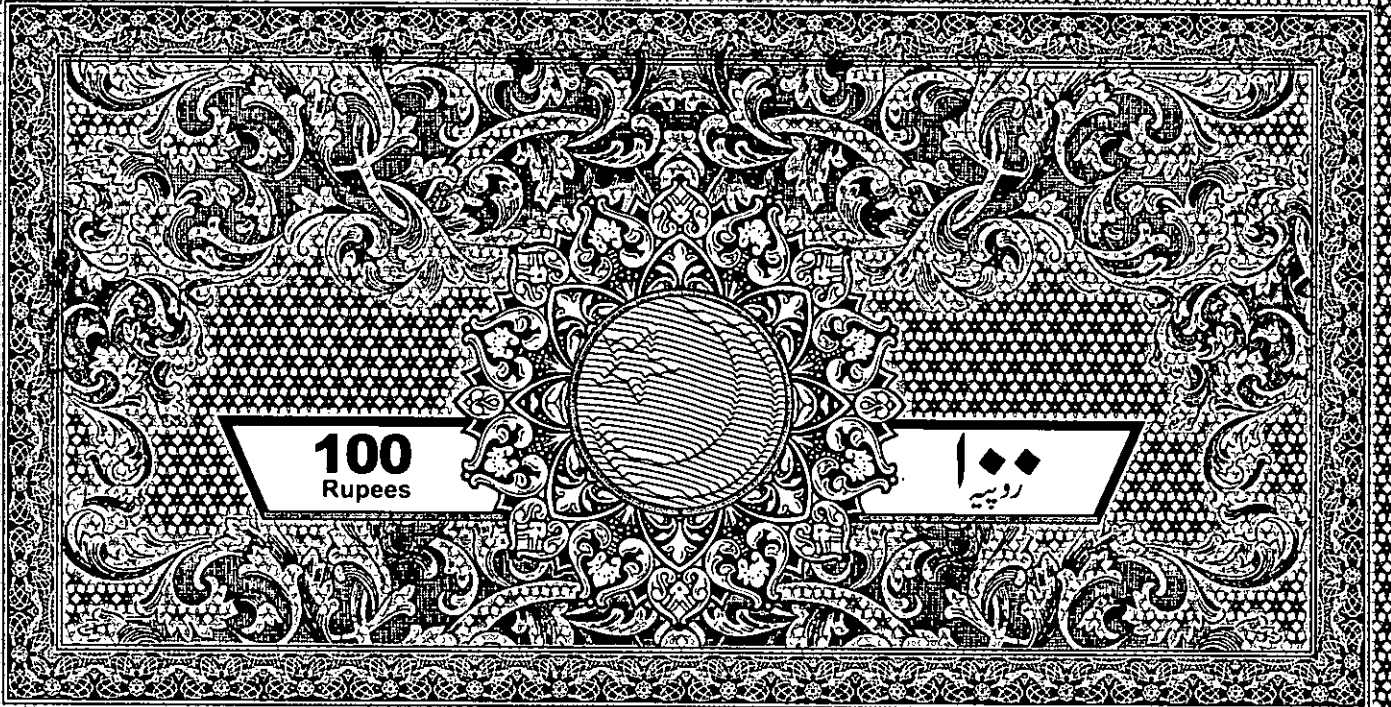
ال 1-8316895-11101 عبد

حسن عزیز ولد یاسین خان
سکین محلہ نواب صاحب بنوں

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100
Rupees

۱۰۰
روپے

الکے ۱۵۳۰۲-۷۳۵۷۸۲۷-۹۱

رافق اللہ ولد محمد اللہ
سکون شہزادہ لوگر دیہ
کابل

الکے ۱۵۲۰۲-۶۲۹۱۱۱۳-۵

سید محمد حسن ولد داد افغان
ساکنی بگرام کوئٹہ کھیل منوج ضلع
پنجاب

الکے ۱۵۲۰۱-۵۷۵۳۳۶۸-۹

فہر اللہ ولد مراد اللہ
ساکنی نبروزہ حیدرآباد
پنجاب

الکے ۱۵۴۰۲-۷۶۹۷۲۲۵-۲

اسد اللہ ولد محمد زخان
ساکنی اسلام آباد ضلع میان وردی
پنجاب

الکے ۱۷۱۰۱-۸۸۳۷۵۴۸۲-۱

محمد اللہ ولد حمید خان
ساکنی دوسری علیہ چارسدہ
پنجاب

الکے ۱۵۶۰۲-۶۱۶۳۶۵۲-۳۱

منصور احمد ولد شرف محمد
ساکنی شہزادہ فتح منگورہ میان
پنجاب

021186

سریل نمبر

قیمت 70 روپے



ایڈوکیٹ: محمد حسان ایڈووکیٹ

بار کونسل ایسوسی ایشن نمبر: BC-17-8055

رابطہ نمبر: 0314-9913443

ڈسٹرکٹ بار ایسوسی ایشن مردان

BC-22-4580

بعدالت جناب: جسٹس سرورس ٹریبونل سجاد

منجانب: ریسائڈنٹ مین

صنم سرور
بنام

ڈائریکٹوریٹ منڈرگروٹ وغیرہ

دعویٰ مقدمہ: سرورس اسپی

علت نمبر: مورخہ:

جرم:

تھانہ:

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کا روائی متعلقہ
 آن مقام کے آفیسر کے ذریعے محمد حسان ایڈووکیٹ جسٹس ٹریبونل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
 راجسی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زر 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
 کارروائی 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 بالا اختیارات حاصل ہوں گے اور اس کا نسخہ برداشتہ منظور قبول ہوگا۔
 دوران مقدمہ جو خرچہ و ہرجانہ اتوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہوں گے۔

نیز بقایا خرچہ کی وصولی کا بھی اختیار ہوگا۔ اگر کسی تاخیر پیشی پر وکیل موصوف دورہ پر ہو یا مقام سے باہر ہو یا بیمار ہو
 یا کوئی ضروری کام ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دینا تاکہ سند رہے۔

DISTRICT BAR ASSOCIATION MARDAN
KHYBER PAKHTUNKHWA

المقوم: _____ مقام کے لئے منظور ہے۔

Muhammad Hayyan
Advocate High Court
District Courts Mardan
منظور تصدیق شدہ

شیخ محمد ولد مسالار احمد بولانی و مختار صاحب
وکیل ریسائڈنٹ مین