


FORM OF ORDER SHEET

Court of _____

Appeal No. 1931/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/09/2023	<p>The appeal of Mst. Farhat Gul presented today by Mr. Amjad Ali Mardan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 27.09.2023. Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 1931 /2023

Mst. Farhat Gul.....Appellant

VERSUS

Govt. of K.P through Secretary
Elementary & Secondary Education & others.,...Respondents

I N D E X

S.No.	Description of documents.	Annexure	Page
1.	Memo of appeal with affidavit.		1-5
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6.	Copy of order dated 21.08.2023	C	11
7.	Copy of departmental appeal	D	12
8.	Copy of order dated 04.09.2023	E	13
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10.	Copies of pay slips	H	16-17
11.	Copy of leave cancellation application & proceedings	I	18
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Appellant

Through


Amjad Ali (Mardan)

Advocate

Supreme Court of Pakistan

Cell: 0321-9882434

(1)

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

Service Appeal No. 193 /2023

Mst. Farhat Gul, Principal (BPS-19)
GGCMHSS Canal Road, Mardan

.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
2. Director Elementary & Secondary Education, Civil Secretariat, Peshawar
3. District Education Officer (F), Mardan.
4. Mst. Shabana Begum, Principal (BPS-19) GGHSS, Shahdand Baba, Mardan.

....Respondents

**SERVICE APPEAL U/S 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AGAINST ORDER DATED
21.08.2023, WHEREIN RESPONDENT NO.4
HAS BEEN TRANSFERRED AGAINST THE
POST ALREADY HELD BY THE APPELLANT
AND THEREAFTER DEPARTMENTAL
APPEAL DATED 30.08.2023 RECEIVED
VIDE DIARY NO.732 DATED 31.08.2023,
WHICH HAS BEEN HELD TO BE NOT
ENTERTAINABLE VIDE APPELLATE
ORDER DATED 04.09.2023 WHICH IS
ILLEGAL AND AGAINST LAW AND FACTS.**

PRAYER

On acceptance of this appeal, the impugned order dated 21.08.2023 and appellate order dated 04.09.2023 may please be set-aside and the posting order of the appellant dated 28.01.2022 may please be continued to perform duty at her school i.e. GGCMHSS Canal Road, Mardan.

Sir:-

Appellant humbly submits as under:-

- 1) That appellant was posted by the competent authority vide order dated 28.01.2022 against the vacant post of Principal (BPS-19) at GGCMHSS Canal Road, Mardan. **(Copy of posting order is attached as Annexure "A")**
- 2) That appellant took over the charge against the said post and continued her duty.
- 3) That appellant has been granted leave of 305 days vide order dated 27.07.2023. **(Copy of order dated 27.07.2023 is attached as Annexure "B")**
- 4) That vide order dated 21.08.2023, the respondent No.4 has been transferred from GGHSS Shahdand Baba against the post i.e. Principal GGCMHSS Canal Road, Mardan which has already been occupied by the appellant, considering the same as vacant, which is illegal, against law and facts. **(Copy of order dated 21.08.2023 is attached as Annexure "C")**

- (3)
- 5) That appellant filed departmental appeal dated 30.08.2023, which was received by the respondents vide Diary No.732 dated 31.08.2023. **(Copy of departmental appeal is attached as Annexure "D")**
 - 6) That the respondent No.1 dismissed the appeal of the appellant being not entertainable vide order 04.09.2023, which is illegal, unlawful and against law & facts. **(Copy of order dated 04.09.2023 is attached as Annexure "E")**
 - 7) That the impugned orders are illegal, against law and facts, therefore, the appellants approaches this hon'ble Tribunal on the following grounds:-

GROUND.

- A. Because the impugned transfer order has been passed inspite of the ban imposed upon by the Govt. vide order dated 15.08.2023 and by the Election Commission vide order dated 29.05.2023. **(Copies of orders dated 15.08.2023 & 29.05.2023 are attached as Annexure "F & G")**
- B. Because appellant is regularly receiving salary against the post of Principal GGCMHSS Canal Road, Mardan as obvious from her pay slips. **(Copies of pay slips are attached as Annexure "H")**
- C. Because inspite of the ban the impugned order has been passed.
- D. Because impugned order is the result of favouritism and political consideration.
- E. Because the impugned order is not a routine order

- F. Because the impugned order by itself shows that the respondent No.4 is being posted to the station of her choice leaving her original station as Principal GGHSS Shahdand Baba vacant.
- G. Because impugned order is against the transfer/posting policy as it gives birth to series of transfer which is prohibited under the posting & transfer policy.
- H. Because the post of GGHSS Shahdand Baba, Mardan is to be filled by another incumbent, which is nothing but to act upon the desire of respondent No.4, which cannot be justified on any plan and under any circumstances.
- I. Because the appellant has not completed the normal tenure of posting at GGCMHSS Canal Road, Mardan and on this score too it is against the Tenure Posting & Transfer Policy.
- J. Because the post of Principal GGCMHSS Canal Road, Mardan has already been occupied by the appellant and appellant is receiving salary against the said post and treating the same as vacant is illegal, against all norms of justice and faire play.
- K. Because appellant has cancelled her leave and continue her service at GGCMHSS Canal Road, Mardan.
(Copies of leave cancellation application and proceeding are Annex "I")

- (4)
- F. Because the impugned order by itself shows that the respondent No.4 is being posted to the station of her choice leaving her original station as Principal GGHSS Shahdand Baba vacant.
- G. Because impugned order is against the transfer/posting policy as it gives birth to series of transfer which is prohibited under the posting & transfer policy. **(Copy of Posting & Transfer policy is attached as Annexure "I")**
- H. Because the post of GGHSS Shahdand Baba, Mardan is to be filled by another incumbent, which is nothing but to act upon the desire of respondent No.4, which cannot be justified on any plan and under any circumstances.
- I. Because the appellant has not completed the normal tenure of posting at GGCMHSS Canal Road, Mardan and on this score too it is against the Tenure Posting & Transfer Policy.
- J. Because the post of Principal GGCMHSS Canal Road, Mardan has already been occupied by the appellant and appellant is receiving salary against the said post and treating the same as vacant is illegal, against all norms of justice and faire play.
- K. Because appellant has cancelled her leave and continue her service at GGCMHSS Canal Road, Mardan. **(Copies of leave cancellation application and proceeding are Annex "J")**

(5)

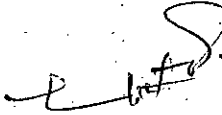
L. Because appellant has not been treated in accordance with law which is violation of Article 4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973.

PAYER

It is therefore, humbly prayed that on acceptance of this appeal, the impugned order dated 21.08.2023 and appellate order dated 04.09.2023 may please be set-aside and the posting order of the appellant dated 28.01.2022 may please be continued to perform duty at her school i.e. GGCMHSS Canal Road, Mardan.

Any other relief which this hon'ble court deems appropriate in the circumstances of the case though not specifically asked for may kindly also be granted.

Dated: 21.09.2023



Appellant

Through


ADVOCATE
SUPREME COURT

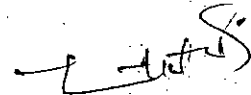
Amjad Ali (Madan)

Advocate

Supreme Court of Pakistan

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.



Deponent

(6)

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

In re:
Service Appeal No. _____/2023

Mst. Farhat Gul.....Appellant

VERSUS

Govt. of K.P through Secretary
Elementary & Secondary Education & others.,...Respondents

*Application for suspension of operation of
impugned transfer/ posting order dated
21.08.2023 and appellate order dated
04.09.2023 till final decision of titled
petition.*

Sir:-

1. That the above titled appeal is being filed before this hon'ble Tribunal alongwith instant application.
2. That the grounds of main appeal may kindly also be considered as integral part and parcel of this application.
3. That appellant is having a good prima-facie case in their favour and is also sanguine about it success.
4. That balance of convenience also lies in favour of suspension of impugned orders.
5. That if the relief as prayed for in the heading of this application is not granted, the very purpose of titled


petition will become infructuous and the appellant will suffer great loss. (7)

It is, therefore, prayed that on acceptance of this application, the relief as prayed for in the heading of this application may graciously be granted.

Dated: 21.09.2023


Appellant

Through


ADVOCATE
Amjad Ali (Madan)
Advocate
Supreme Court of Pakistan

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.


Deponent

(8)

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

Service Appeal No. _____/2023

Mst. Farhat Gul.....Appellant

VERSUS

Govt. of K.P through Secretary
Elementary & Secondary Education & others,....Respondents

ADDRESSES OF PARTIES

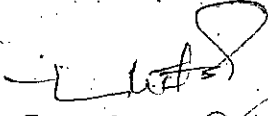
APPELLANT

Mst. Farhat Gul, Principal (BPS-19)
GGCMHSS Canal Road, Mardan

RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education, Civil
Secretariat, Peshawar
2. Director Elementary & Secondary Education, Civil
Secretariat, Peshawar
3. District Education Officer (F), Mardan.
4. Mst. Shabana Begum, Principal (BPS-19) GGHSS,
Shahdand Baba, Mardan

Through


Appellant *Amjad Ali*
ADVOCATE
SUPREME COURT
Amjad Ali (Mardan)
Advocate
Supreme Court of Pakistan



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
BLOCK A OPPOSITE MPA,S HOSTEL, CIVIL SECRETARIAT
PESHAWAR
PHONE NO 091-9273588

Aux - A

(9)

Dated Peshawar the January 28th 2022

NOTIFICATION

NO.SO(S/F)E&SED/4-16/2022/Posting/Transfer: The Competent Authority is pleased to transfer Mst. Farhat Gul Principal (BS-19) from GGHS Hathian Mardan and post her against the vacant post of Principal (BS-19) at GGCMHSS Canal Road Mardan, with immediate effect, in the public interest.

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of even No.& date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Mardan.
4. District Account Officer Mardan.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officers concerned.
8. Office order file.

[Handwritten Signature]
28/1/2022
SECTION OFFICER (ST)

[Handwritten Signature]
ADVOCATE
SUPREME COURT

9A

CERTIFICATE OF TRANSFER OF CHARGE.

1. Certified that we have After noon of this day, on 29-01-2022 respectively made over charge of the Office of the Transfer BS-19, post at GGCMHSS CANAL ROAD MARDAN, Notification No SO(S/F)/E&SED/4-16/2022/Posting/Transfer on Dated 28.01.2022.

Signature of Relieved _____

Govt. Servant: Vacant

Designation: Principal BPS-19

Station: GGCMHSS Canal Road Mardan.

Signature of Relieving, [Signature]

Govt. Servant: Farhat Gul

Designation: Principal BPS-19

Dated: 29-01-2022, A/N.

OFFICE OF THE PRINCIPAL GGCMHSS CANAL ROAD MARDAN.

No. 1643

Dated 29/01 /2022.

Copy to the above is forwarded to the:-

1. Director E/S Education KPK Peshawar.
2. District Education Office (Female) Mardan.
3. District Comptroller of Accounts Mardan.
4. Officer Concerned.

[Signature]

PRINCIPAL
GGCMHSS Canal Road, Mardan

[Signature]

Ann-B

10



GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar the July 27, 2023

NOTIFICATION

NO. AO/E&SE/4-24/Leave/Mardan: Sanction is hereby accorded to the grant of 305 days Ex-Pakistan leave w.e.f. 01-07-2023 to 30-04-2024 in favour of Mst. Farhat Gul Principal BS-19 GCMHSS Canal Road Mardan as per following break up as admissible under the Revised Leave Rules 1981.

S#	Leave Period	No. of Days	Remarks
1	01-07-2023 to 28-10-2023	120 days	Ex-Pakistan Leave on full pay
2	29-10-2023 to 30-04-2024	185 days	Ex-Pakistan Leave on half pay

SECRETARY
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Edu: Department

Endst: of even No. & date:
Copy forwarded to:

1. The Director E&SE, Khyber Pakhtunkhwa, Peshawar.
2. The District Accounts Officer, Mardan.
3. The District Education Officer (Female), Mardan.
4. The Section Officer (Schools/Female), Elementary & Secondary Education Department.
5. Mst. Farhat Gul Principal BS-19 GCMHSS Canal Road Mardan.
6. Master File.

Amjad Ali
ADVOCATE
SUPREME COURT

Abdul Ghaffar
(ABDUL GHAFFAR)
SECTION OFFICER (ACCOUNTS)

31/7

BETTER COPY

Better copy
Aad-e

GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
091-9223588

(11)

Dated Peshawar the August 21st, 2023

NOTIFICATION

No. SO (S/E) S&SED/4-16/2022/Posting/ Transfer: Consequent upon provision of NOC by Election Commission of Pakistan vide letter dated 01.02.2023, Mst Shabana Begum Principal (BPS-19) under transfer to GGHS Shahdand Baba Mardan is hereby posted at GGCMHSS Canal Road Mardan, against the vacant post of Principal (BS-19) with immediate effect.


Sd/---
Secretary to Govt. of Khyber Pakhtunkhwa
E&SE Department

Endst: of even No & date.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa.
2. Director, E&SE Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Female) Mardan.
4. District Account Officer Mardan.
5. District EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department.
8. Teacher concerned.
9. Office order file.

Sd/---
Shawana Haleem
Section Officer (S/F)


ADVOCATE
SUPREME COURT

Ann - C

(11)

GOVT. OF KHYBER PAKHTUNKHWA
PRIMARY & SECONDARY EDUCATION DEPARTMENT

Email: sec_education@kpk.gov.pk
011-9223588

Dated Peshawar the August 21, 2023

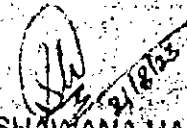
NOTIFICATION

GOVT. OF KHYBER PAKHTUNKHWA (14/16/2022/Posting/Transfer): Consequent upon provision of NOC from Government of Pakistan vide letter dated 01.02.2023, Mst. Shubana Begum (BS-19) is hereby transferred to GGISS Shahdand Baba Mardan is hereby posted to GGISS Shahdand Baba Mardan, against the vacant post of Principal (BS-19), with effect from 01.08.2023.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

For information No. & date:

- 1. Secretary to Govt. of Khyber Pakhtunkhwa, Peshawar.
- 2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer (Female) Mardan.
- 4. District Account Officer Mardan.
- 5. Director MIS, E&SE Department for uploading at official website at the earliest.
- 6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
- 7. PS to Secretary, E&SE Department.
- 8. Reply if concerned.
- 9. Office order file.


(SHAWANA HALEEMY)
SECTION OFFICER (S/E)



Area D

(12)

To

The Secretary Of Elementary and Secondary Education Department
Govt. Of Khyber Pakhtunkhwa Peshawar

Subject: Appeal For Cancellation Transfer Order BPS-19

Reference your Notification No .SO/(S/F)E&SED/4-
16/2022/posting/transfer/ MST Shabana begum dated:21-8-2023

With humble regards it is stated that I MST Farhat Gul BPS-19
principal is serving in GGCMHSS Canal Road Mardan.

It is stated furthermore that I am on Ex-Pakistan leave vide
Secretary Education KPK Notification. AO/E&SE/4-24 leave dated July
27,2023(copy attached). The same post is already occupied by me.

It is therefore requested that the transfer order of MST Shabana
begum may kindly be cancelled till my joining time please.

I will be grateful to you for this act of kindness.

Dated-30-8-2023

732
31/8/23

U. B. L. M. S.

Yours obediently,

Farhat Gul

MST Farhat Gul

GGCMHSS canal Road

Mardan

Mr. Q. A. Khan
ADVOCATE

SI PRIME COURT



GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Email: sectionofficersf@gmail.com

091-9223588

No. SO(S/F) E&SED/4-16/2023

Dated Peshawar the September 4th, 2023

Aux-E

(13)

To

Mst. Farhat Gul
Principal (BS-19)
GGHSS Canal Road Mardan.

Subject: APPEAL FOR CANCELLATION TRANSFER ORDER BPS-19


I am directed to refer to the subject noted above and to convey that this Department cannot entertain your application received on 31.08.2023, please.


(SHAWANA HALEEM)
SECTION OFFICER (S/F)

Endst: of even No. & Date:

Copy forwarded for information to: PS to Secretary, E&SE Department.


SECTION OFFICER (S/F)


ADVOCATE
SUPREME COURT

Annex - F

(14)

ELECTION COMMISSION OF PAKISTAN



NOTIFICATION

Islamabad the 15th August, 2023

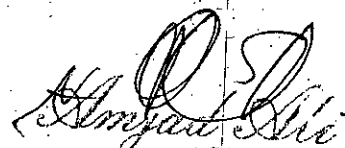
F.No.2(1)/2023-Coord.- WHEREAS, the National Assembly and Provincial Assemblies of Sindh and Balochistan under Articles 58(1) and Article 112(1) of the Constitution of the Islamic Republic of Pakistan stand dissolved on 9th, 11th and 12th August, 2023 respectively.

AND WHEREAS, the Election Commission of Pakistan is mandated with the constitutional duty to organize and conduct elections in terms of Article 218(3) of the Constitution and to make such arrangements as are necessary to ensure that the elections are conducted honestly, justly, fairly and in accordance with the law and that corrupt practices are guarded against.

AND WHEREAS, it has become imperative that the Election Commission shall take all necessary steps under the Constitution and prevalent law for the smooth conduct of General Elections.

NOW THEREFORE, in exercise of the powers conferred upon it under Articles 218(3), 220 of the Constitution of the Islamic Republic of Pakistan as well as Sections 4, 5, 8(c) read with Section 230 of the Elections Act, 2017 and as supported by the Workers' Party case through Akhtar Hussain-Advocate, General Secretary and 6 others Versus Federation of Pakistan and 2 others reported in PLD 2012 SC 681, and all the other powers enabling it in this behalf, the Election Commission of Pakistan, to ensure transparent election and to provide a level playing field for all contesting candidates and political parties, hereby directs the Caretaker Governments at the Federal and Provincial levels:-

- (a) To assist the Election Commission to hold elections in accordance with law as provided under section 230(1)(b) of the Elections Act, 2017.
- (b) To ensure the compliance of all the notifications, directives and the provisions as laid down in Section 230 of the Act *ibid*.
- (c) Not to post or transfer any public official after the issuance of this notification under the Federal Government and the Provincial Governments without prior approval in writing of the Election Commission as laid down in Clause 2(f) of Section 230 of the Elections Act, 2017.
- (d) Ensure that all kinds of recruitments in any Ministry, Division, Department or Institution under the Federal, Provincial Governments and Local Governments are banned with immediate effect, except with the prior approval of the Commission and except recruitments by the Federal and Provincial Public Service Commissions and those government organizations where test / interviews have already been conducted before this day.


ADVOCATE
SUPREME COURT

AIX-G

15



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

IRREGULARITY

No. SO (Policy) (E&AD) 1-4/2023
Dated Peshawar, the 29th May, 2023

To

1. Additional Chief Secretary P&D Department Govt. of Khyber Pakhtunkhwa
2. Senior Member Board of Revenue, Govt. of Khyber Pakhtunkhwa
3. Administrative Secretaries to Govt. of Khyber Pakhtunkhwa
4. All Divisional Commissioners in Khyber Pakhtunkhwa
5. All Heads of Attached Departments in Khyber Pakhtunkhwa
6. All Deputy Commissioners in Khyber Pakhtunkhwa

Subject -
Dear Sir,

BAN ON POSTINGS AND TRANSFERS IN KHYBER PAKHTUNKHWA

I am directed to refer to the above cited subject and to convey that in view of the fragile fiscal position of the Provincial Government, the Hon'ble Chief Minister Khyber Pakhtunkhwa has been pleased to impose ban on inter-district posting and transfers of officers and officials under the Government of Khyber Pakhtunkhwa as per the following:

- i. There shall be complete ban on inter-district-transfers in all the departments;
- ii. This ban shall not apply on transfers within the districts and within the Secretariat and Directorates. However, while proposing such transfers of officers/officials within the district, Directorates or the Secretariat, as the case may be, due diligence must be observed and tenure, suitability of the officers/officials for the posts and past performance must be taken into account;
- iii. In cases posting and transfer is necessitated due to some court orders or some administrative exigencies, ban relaxation will be obtained from Chief Minister through summary. For such posting/transfers, departments will put forth sound justifications. Subsequently in cases where NOC from Election Commission is required, cases will be taken up with ECP for ban relaxation by the concerned Administrative Departments.
- iv. This ban shall not apply on filling of vacant posts through recommendations of the Khyber Pakhtunkhwa Public Service Commission as Election Commission of Pakistan has already granted exemption in such cases.

Yours sincerely,

(Signature)
Deputy Secretary (P&D) 23

ENDST: NO. & DATE EVEN

Copy is forwarded for information to:

1. Principal Secretary to Governor, Khyber Pakhtunkhwa
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa
3. CSO/PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa
4. All Additional Secretaries/Deputy Secretaries/Section Officers in Establishment & Administration Department

31/5/23

ASCA

31/5/23

1- Circulate
may be noted

DS (E&A)

Dist. Govt. NWFP-Provincial
District Accounts Office Mardan
Monthly Salary Statement (April-2023)

Annex-H



Personal Information of Mrs FARHAT GUL d/w/s of GUL SADBBERG

Personnel Number: 00131357 CNIC: 1730112915066 NTN: 4275662-6
Date of Birth: 09.09.1973 Entry into Govt. Service: 29.12.1999 Length of Service: 23 Years 04 Months 003 Days

Employment Category: Vocational Temporary

Designation: PRINCIPAL 80003520-DISTRICT GOVERNMENT KHYBE

DDO Code: MR6127-PRINCIPAL G.CENT.MOD.SCHOOL (G) MAR

Payroll Section: 003 GPF Section: 001 Cash Center: 0

GPF A/C No: EDU 045887 Interest Applied: Yes GPF Balance: 1,383,750.00

Vendor Number: 30317433 - FARHAT GUL

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 19 Pay Stage: 10

(16)

Wage type		Amount	Wage type		Amount
0001	Basic Pay	133,140.00	1001	House Rent Allowance 45%	13,284.00
1210	Convey Allowance 2005	5,000.00	1505	Charge Allowance	100.00
1518	Entertainment Allowance	500.00	1947	Medical Allow 15% (16-22)	2,818.00
2148	15% Adhoc Relief All-2013	1,600.00	2199	Adhoc Relief Allow @10%	1,089.00
2315	Special Allowance 2021	11,842.00	2341	Dispr. Red All 15% 2022KP	12,999.00
2347	Adhoc Rel AI 15% 22(PS17)	12,999.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3019	GPF Subscription	-7,180.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-13,171.00	3990	Emp.Edu. Fund KPK	-270.00
4004	R. Benefits & Death Comp:	-1,600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	792,000.00	-24,000.00	192,000.00

Deductions - Income Tax

Payable: 155,225.13 Recovered till April-2023: 128,884.00 Exempted: 0.31- Recoverable: 26,341.44

Gross Pay (Rs.): 195,371.00 Deductions: (Rs.): -47,721.00 Net Pay: (Rs.): 147,650.00

Payee Name: FARHAT GUL

Account Number: PLS000000021410

Bank Details: UNITED BANK LIMITED, 211406 SHAMSI ROAD SHAMSI ROAD,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: SHAMSI ROAD MARDAN

City: MARDAN

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

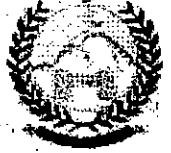
Temp. Address:

City:

Email:

[Signature]
ADVOCATE
SUPREME COURT

Dist. Govt. NWFP-Provincial
District Accounts Office Mardan
Monthly Salary Statement (May-2023)



Personal Information of Mrs FARHAT GUL d/w/s of GUL SADBBERG

Personnel Number: 00131357

CNIC: 1730112915066

NTN: 4275662-6

Date of Birth: 09.09.1973

Entry into Govt. Service: 29.12.1999

Length of Service: 23 Years 05 Months 004 Days

Employment Category: Vocational Temporary

Designation: PRINCIPAL

80003520-DISTRICT GOVERNMENT KHYBE

DDO Code: MR6127-PRINCIPAL G.CENT.MOD.SCHOOL (G) MAR

Payroll Section: 003

GPF Section: 001

Cash Center: 0

GPF A/C No: EDU 045887

Interest Applied: Yes

GPF Balance:

1,418,410.00

Vendor Number: 30317433 - FARHAT GUL

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 19

Pay Stage: 10

Wage type		Amount	Wage type		Amount
0001	Basic Pay	133,140.00	1001	House Rent Allowance 45%	13,284.00
1210	Convey Allowance 2005	5,000.00	1505	Charge Allowance	100.00
1518	Entertainment Allowance	500.00	1947	Medical Allow 15% (16-22)	2,818.00
2148	15% Adhoc Relief All-2013	1,600.00	2199	Adhoc Relief Allow @10%	1,089.00
2315	Special Allowance 2021	11,842.00	2341	Dispr. Red All 15% 2022KP	12,999.00
2347	Adhoc Rel Al 15% 22(PS17) *	12,999.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3019	GPF Subscription	-10,660.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-13,171.00	3990	Emp.Edu. Fund KPK	-270.00
4004	R. Benefits & Death Comp:	-1,600.00	4200	Professional Tax	-2,000.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	792,000.00	-24,000.00	168,000.00

Deductions - Income Tax

Payable: 155,225.13 Recovered till May-2023: 142,055.00 Exempted: 0.45 Recoverable: 13,170.58

Gross Pay (Rs.): 195,371.00 Deductions: (Rs.): -53,201.00 Net Pay: (Rs.): 142,170.00

Payee Name: FARHAT GUL

Account Number: PLS000000021410

Bank Details: UNITED BANK LIMITED, 211406 SHAMSI ROAD SHAMSI ROAD,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: SHAMSI ROAD MARDAN

City: MARDAN

Domicile: NW Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

M. Amjad Ali
ADVOCATE
SUPREME COURT

Ann-I (18)

The DEPT, Mardan.

Alice

Subject :- Resuming Duty

Respected/Madam,

With humble regards it is

stated that I was on ex-pakistan leave from
01-07-2023 to 30/04/2024 due to some medical
problems. Now I resume my duty on 20/09/23

and want to cancel rest of my leave from
20/09/23 to 30/04/2024. Kindly adjust me in my own school

CPICMHS Canal Road, Mardan. I shall be very

thankful to you.

Yours Sincerely

Farhad Gul
PRINCIPAL
CPICMHS
Canal Road Mardan

2633

20/09/2023

عدالت عالیہ پاکستان سول سروسز ایسوسی ایشن

25/9/2023
3 تا 25 ستمبر 2023ء پنجاب ایڈووکیٹس

مورخہ:
مقدمہ:
دعویٰ:
جرم:

بنام: **مہار فرمت گل سع حکومت**

کی باجوہ (تعمیر آفیس)

مقدمہ مندرجہ عنوان بالا اپنی طرف سے واسطے بیروی وجہاً وہی وکل کاروائی متعلقہ

آپن مقام **پشاور** کیلئے **امجد علی ایڈووکیٹس، سپریم کورٹ آف پاکستان اسلام آباد**

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو رضی نامہ کرنے و تقررات و فیصلہ برحلاف دیئے جواب وہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء وصولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زاریں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری یکطرفہ یا اپیل کی براندگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا اختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ و جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ بیروی مذکور کریں۔
لہذا وکالت نامہ لکھ دیا کہ سنڈر ہے۔

المرفوم: 25 ستمبر 2023ء

مقام **پشاور** کے لیے منظور ہے۔

Attested/Accepted
Amjad Ali
ADVOCATE
SUPREME COURT

1610184702983