


The appeal of Mst. Rooqia Bibi d/o Arifullah GGPS Latif Kalay Bara Khyber Agency in District Charsadda received today i.e on 04.08.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


- 1- Check list is blank which be filled up.
- 2- Appeal has not been flagged/marked which annexures marks.
- 3- Annexures of the appeal are unattested.
- 4- The law under which appeal is filed is not mentioned.

No. 3005 /S.T.

DI. 7/8 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Adeel Butt Adv.
High Court Peshawar.

- 1) Check list filled and attached
 - 2) Flags are attached
 - 3) Attestation has been made
 - 4) Section 4 Service Tribunal Act, 1974
- 

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 1631 /2023

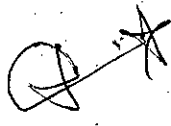
Rooqia BibiAppellant

Versus

Govt. of Khyber Pakhtunkhwa through Secretary Education and
others.....Respondents

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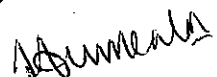

Appellant

Through

Dated: 03.08.2023


Muhammad Adeel Butt

&


Humera Gul
Advocates High Court

①

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 1631 / 2023

Rooqia Bibi D/O Arifullah W/O Tariq Bilal
GGPS Latif Kalay, Bara, Khyber Agency
R/O Mohallah Bamat khel, Umerzai, District CharsaddaAppellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar
2. Director of Education, Directorate of Education situated at GT Road Peshawar City.
3. District Education Officer, DEO Office, District Khyber
♦ ...Respondents

APPEAL, AGAINST THE INACTION OF
RESPONDENTS, WHEREBY THE APPELLANT
HAS NOT BEEN PAID HER MONTHLY
SALARIES BY THE RESPONDENTS AND, NOT
ALLOWING HER TO PERFORM HER OFFICIAL
DUTIES WITHOUT ANY REASON.

Prayer:

On acceptance of appeal the appellant may please be allowed to perform her duties with all back benefits. Any other remedy deems 'fit may also be granted under the circumstances.

Respectfully Sheweth:

The Appellant submits as under: -

1. That, consequent upon the approval of Departmental

appointed against the vacant post of T.T on 25.08.2009 at Government Girls' Primary School, Latif Kalay, Bara Khyber Agency, in BPS -07. **(Copy of the Appointment order is annexed as Annexure "A")**

2. That due to the Talibanisation and usual law and order situation at that time the Appellant was re-deployed to GGPS Hayat Shah Killi Mulagori Jamrud on 21/05/2015. The Appellant performed her duties to the best satisfaction of Respondents and hence the respondents were paying her monthly salaries till 2017. **(Copy of Re-deployed is annexed as Annexure "B")**

3. That since the respondents without any reason stopped her salaries and she has been stopped verbally not to perform her official duties. Appellant was not given monthly salary, for which Appellant has submitted several applications for releasing her salaries, but in vain. It is important to mention that the respondents have not issued any letter regarding stoppage of her pay/salary nor there is any charge against her. The Appellant tried her level best and knocked every door in order to get her salaries paid but the Respondents have taken no action whatsoever. **(Copies of Salary Slips are annexed as Annexure "C")**

4. That finally the Appellant filed a departmental representation /appeal before the Respondents on 30.03.2023 and waited for the stipulated period of time but as mentioned above no action whatsoever has been taken by them. **(Copy of Departmental Appeal is annexed as Annexure "D")**

5. That the Appellant feeling aggrieved from the inaction of Respondents files the instant Service appeal inter alia on the following grounds: -

GROUNDS:

- A. That the Appellant has not been treated in accordance with law.
- B. That it is a settled principle of Law that no one can either stop the salary of a Civil servant or stop one in performing his duty without adopting the due process of law without adopting due course of law, no one can stop the can salary.
- C. This act / inaction of Respondents against the Appellant is violation of the principles of policy contained in Chapter 2 part-II of the constitution and also Article 3 of the Constitution, which cost duty on the state to eliminate all forms of exploitation.
- D. That the above mentioned issue has sufficiently been dilated in the recent judgment of this Court in case, "Abdul Latif and others Vs Secretary C&W Department Khyber Pakhtunkhwa, Peshawar and 5 others 2014 PLC (C.S) 330, wherein it is held that:

"Their appointments are not questioned to have been made in violation of law. They are working since their appointment in January, 2013 without salaries, which is harsh in nature. The record is also silent about any query from the appointing authority of the petitioners, to the effect as to whether appointments were made in violation of law or without observing the legal and formal codal formalities, required for appointment. Though there appears no illegality in the appointment of the petitioners, even then, if any irregularity is alleged and based for non-issuance of NOC, the same could not be made as hurdle by the concerned authorities, as the appointment of an employee, if in any case made against the established procedure, would not burden him, rather the appointing authority would be responsible for committing misconduct by making

irregular appointments. Reliance in this respect is placed on the case of Province of Punjab through Secretary Agriculture, government of Punjab and others V. S Zulfiqar Ali (2006 SCMR 678)."

It is hereby worth important to mention that no reason whatsoever has been communicated to the Appellant with respect to stoppage of her Salary and performance of duty.

E. The Secretary, Establishment Division, Government of Pakistan and others 1996 SCMR 1185 as under: (at page 1193 para 16). Para 16. "If a Tribunal or this Court decides a point of law relating to terms and conditions of a civil servant who litigated, and there were other civil servants, who may not have taken any legal proceedings, in such a case, the dictates of justice and rule of good governance demand that the benefit of the said decision be extended to other civil servants also, who may not be parties to that litigation instead of compelling them to approach the Tribunal or any other legal forums" Same view has also been applied to the case of Tara Chand and others V. Karachi Water & Sewerage Board, Karachi 2005 SCMR 7 (Prov. Govt. Vs. Niaz Ali & others) 499 (at page 506 para 10) and Govt. of Punjab through Chief Secretary Education & others Vs. Sameena Parveen 2009 SCMR 1 (at page 4 para 6).

F. That the Appellant being a married woman having little kids knocked the doors of Respondents but till now no action whatsoever has been taken in respect of her salaries and performance of duty.

G. That the Respondents are well aware about the fact that from the years 2000-2011, the whole Khyber agency was the victim of terrorism, and much of the official record of

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quite impossible for them to find out the record related to Appellant with respect to her performance in schools, hence they purposely are delaying the matter.

H. That the Appellant belongs to a very poor family and teaching is the only source of income,.

It is, therefore, most humbly requested that on acceptance of this appeal, respondents may kindly be directed to release/ pay the monthly salaries of the Appellant from year 2017 till date and the appellant may please be allowed to perform her duties with all back benefits.

Any other remedy deems fit may also be granted under the circumstances.

[Handwritten signature]

Appellant

Through

Dated: 03.08.2023

[Handwritten signature]
Muhammad Adeel Butt

[Handwritten signature]
Humera Gul
Advocates High Court

Note: No such appeal has ever been made to Service Tribunal on the subject by the appellant or in any other court of Law.

[Handwritten signature]

Appellant

AFFIDAVIT

As per direction of my client I, do hereby solemnly affirm and declare on oath that all the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

ATTESTED

[Handwritten signature]

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BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____ / 2023

Rooqia BibiAppellant

Versus

Govt. of K.P through Secretary Education and others...Respondents

ADDRESS OF THE PARTIES

APPELLANT:

Rooqia Bibi D/O Arifullah W/O Tariq Bilal
GGPS Latif Kalay, Bara, Khyber Agency
R/O Mohallah Bamat khel, Umerzai, District Charsadda

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar
2. Director of Education, Directorate of Education situated at GT Road Peshawar City.
3. District Education Officer, DEO Office, District Khyber

Appellant

Through

Dated: 03.08.2023

Muhammad Adeel Butt

&

Humera Gul
Advocates High Court

(7)

AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD
APPOINTMENT ORDER

Consequent upon the approval of the Departmental Selection Committee Mrs: Rooqia Bibi D/o Arif Ullah candidate is hereby appointed against vacant T.T Post at Government Girls Primary School Latif Killi Bara Khyber Agency in BPS No.07/PM (3530-190-9220) plus usual allowances as admissible under the rules w.e.f the date of her taking over charge in the interest of public service.

Note:-

1. Charge report should be submitted to all concerned.
2. The appointment of the candidate is purely on temporary basis and is liable to terminate any time without any notice.
3. If the candidate wishes to resign her post she will give one-month prior notice or her pay for one month will be forfeited in lieu thereof.
4. Her documents, Date of Birth and NIC should be checked before handed over charge of the post and attested copies thereof may be kept on record of the school/office.
5. She should produce his Health and Age certificate from the Agency Surgeon concerned.
6. She may not be handed over charge if he is below 18- years or above 40- years.
7. If he fails to report her arrival within 15- days of the issue of this appointment order then it will be treated as cancelled.
8. No salary may be drawn before the verification of all the testimonials from the quarter concerned.
9. The appointment will not be entitled for pension/commutation and G.P Fund emoluments as per Govt: policy.

(HASHIM KHAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst: No. 4070-761

Dated Jamrud the. 25/08/2009.

Copy of the above is forwarded to the:-

1. Director Education (FATA) at Peshawar.
2. Agency Accounts Officer Khyber Agency at Jamrud.
3. Agency Surgeon Khyber Agency at LandiKotal.
4. AAEO (Female)/ Pay Clerk Concerned.
5. Official Concerned.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD



3

AGENCY EDUCATION OFFICE
KHYBER AGENCY AT JAMRUD
PHONE. 091-5820584 FAX. 091-5820584
NO _____ DATED: 21/05/2015

AGENCY EDUCATION OFFICE KHYBER AGENCY AT JAMRUD

REDEPLOYMENT ORDER.

Consequent upon the recommendation of AAEO (Female) Jamrud/Bara the following teachers of Tehsil Bara are hereby redeployed to Schools noted against their names on their own request with immediate effect, till the re-opening of their own Schools.

S.#	Name	Desg	From	Redeployed to
1	Shaheen AKhtar	TT	GGMS Tehsil Bara	GGHS Jamrud.
2	Nusrat Begum	SST	GGHS Karigar Bara.	GGHS Jamrud
3	Farida	CT	GGHS Karigar Bara.	GGHS Jamrud
4	Shamshad Begum	PST	GGHS Karigar Bara.	GGHS Jamrud.
5	Farzana Jamal	CT	GGMS Malang Garhi	GGHS Jamrud
6	Safia Begum	PST	GGPS Musam Jan Killi Bara	GGPS Zulfiqar Killi LKL
7	Saima Zarin	PST	GGPS Musam Jan Killi Bara	GGPS Mira Jan Bara
8	Rooqia Bibi	TT	GGPS Latif Killi Shalobar Bara	GGPS Hayat Shah Killi Mulagori Jamrud
9	Saima Begum	PST	GGPS Akhtar Ali Shah Bara	GGPS Hayat Shah Mulagori Jamrud

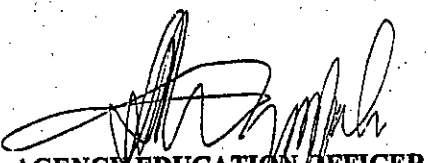
Note: Charge report should be submitted to all concerned.
TA/DA is not allowed.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst: No. 13241-46 Redeployed File Dated :21/05/2015

Copy forwarded to the:

- 1 - Director Education FATA at Peshawar.
- 2 - Political Agent Khyber Agency at Peshawar.
- 3 - Principal GGHS Jamrud Khyber Agency
- 4 - AAEO (F) Local Office.
- 5 - Superintendent local office
- 6 - Officials concerned.


AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD



ACCOUNTANT GENERAL N.W.F.P
DISTRICT
PAY ROLL SYSTEM

PAYMENT ADVICE

SH: 102
P.P.S.#: 00524096
Name: ROQYYA BIBI
Dsg: THEOLOGY TEACHER

P. Sec: 001 Month: August 2010
KH0012 -AGENCY EDUCATION OFFICE
Min: DEPT CODE A & N.A & S.F.R

NIC No. : 2710124763456	Old #:	
GPF Interest Applied		
14 Vocational Temporary		
PAYS AND ALLOWANCES:		
0001-Basic Pay		5,680.00
1000-House Rent Allowance		1,476.00
1300-Medical Allowance		1,000.00
1528-Unattractive Area Allow		1,700.00
1830-Special Relief All(2005)		361.00
1831-Adhoc Relief (2005)		361.00
1864-Dearness Allowance (2006)		465.00
1865-Teaching Allowance (2006)		1,000.00
1908-Adhoc Relief-2009 (01-16)		1,136.00
Gross Pay and Allowances		16,019.00
DEDUCTIONS:		
GPF Balance 1,700.00		
3661-E. E. F (Exchange)	Subrc:	850.00
3701-Benevolent Fund(Exchange)		20.00
3704-Group Insurance(Exchange)		180.00
		115.00
	NET AMOUNT PAYABLE	14,854.00
QUALIFYING SERVICE		1,165.00
YRS MON		
		14,854.00



ACCOUNTANT GENERAL N.W.F.P
DISTRICT
PAY ROLL SYSTEM

PAYMENT ADVICE

SH: 103
P.P.S.#: 00524096
Name: ROQYYA BIBI
Dsg: THEOLOGY TEACHER

P. Sec: 001 Month: August 2010
KH0012 -AGENCY EDUCATION OFFICER
Min: DEPT CODE A & N.A & S.F.R

NIC No. : 2710124763456	Old #:	
GPF Interest Applied		
14 Vocational Temporary		
PAYS AND ALLOWANCES:		
1948-Adhoc Allowance 2010@ 50%		2,840.00
Gross Pay and Allowances		
DEDUCTIONS:		
GPF Balance 1,700.00		
	Subrc:	
		16,019.00
	NET AMOUNT PAYABLE	1,165.00
QUALIFYING SERVICE		1,165.00
YRS MON		
		14,854.00

10

Khyber

P Sec: 001 Month: November 2013
 KH0012 - AGENCY EDUCATION OFFICE
 Mtr: Mrs. Of K. A S. N. A & S. F. R
 NTN:
 GPF #:
 Old #:

Part No: 00524096 Buckle:
 Name: ROQYYA RIBI
 Des: THEOLOGY TEACHER
 CNIC No: 2710124763456
 GPF Interest Applied
 14 Vocational Temporary

DEPT CODE KH0012 -004

PAYS AND ALLOWANCES:	
2151-Adhoc Allowance 2013 @10%	1,105.00
Gross Pay and Allowances	
	26,200.00
DEDUCTIONS:	
GPF Balance 36,442.00	Subtr:
Total Deductions	
	1,780.00
NET AMOUNT PAYABLE	
	24,420.00

B. D. B
 03.04.1978
 13 Years 06 Months 01 Days

LFP Quota:
 HABIB BANK LTD. UNERZAI
 18577100000403

Khyber

PAYMENT ADVISE

P Sec: 001 Month: November 2013
 KH0012 - AGENCY EDUCATION OFFICE
 Mtr: Mrs. Of K. A S. N. A & S. F. R
 NTN:
 GPF #:
 Old #:

54:1

Part No: 00524096 Buckle:
 Name: ROQYYA RIBI
 Des: THEOLOGY TEACHER
 CNIC No: 2710124763456
 GPF Interest Applied
 14 Vocational Temporary

DEPT CODE KH0012 -004

PAYS AND ALLOWANCES:	
0001-Basic Pay	11,050.00
1000-House Rent Allowance	1,476.00
1210-Travel Allowance 700%	2,720.00
1300-Medical Allowance	1,000.00
1523-Unattractive Area Allow	1,700.00
1845-Teaching Allowance (2006)	1,000.00
1948-Adhoc Allowance 2010@ 5%	3,030.00
1970-Adhoc Relief Allow 2011	900.00
2148-Adhoc Relief Allow (2012)	2,210.00
Gross Pay and Allowances	24,200.00
DEDUCTIONS:	
GPF Balance 36,442.00	Subtr:
3700-E. F. (Exchange)	1,372.00
3701-Anniversary Fund (Exchange)	100.00
3704-Group Insurance (Exchange)	180.00
3711-Edi Group Insurance (Edi)	115.00
	13.00
Total Deductions	
	1,780.00
NET AMOUNT PAYABLE	
	24,420.00

B. D. B
 03.04.1978
 13 Years 06 Months 01 Days

LFP Quota:
 HABIB BANK LTD. UNERZAI
 18577100000403

11

khyber

S#:1

P Sec:001 Month:July 2014
KH0012 -AGENCY EDUCATION OFFICER K
Min. Of K.A & N.A & S.F.R

Pers #: 00524096 Buckle:
Name: ROQYYA BIBI
THEOLOGY TEACHER
CNIC No.2710124763456
GPF Interest Applied
14 Vocational Temporary

NTN:
GPF #:
Old #:

KH0012 -0042

PAYS AND ALLOWANCES:

0001-Basic Pay	11,660.00
1000-House Rent Allowance	1,476.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,200.00
1528-Unattractive Area Allow.	1,700.00
1948-Adhoc Allowance 2010@ 50%	3,030.00
1970-Adhoc Relief Allow 2011	909.00
2118-Adhoc Relief Allow (2012)	2,332.00
2151-Adhoc Allowance 2013 @10%	1,166.00
Gross Pay and Allowances	27,495.00

DEDUCTIONS:

GPF Balance 47,418.00	Subrc: 1,372.00
3661-E.E.F (Exchange)	100.00
3701-Benevolent Fund(Exchange)	180.00
3704-Group Insurance(Exchange)	115.00
3711-Addl Group Insuranc(Exch)	13.00
6210-PM Relief Fund IDPs-2014	377.00

Total Deductions 2,157.00

25,338.00

D.O.B
03.04.1978
14 Years 02 Months 012 Days

LFP Quota:
HABIB BANK LIMITED UMARZAI
18577100000403

12

khyber

S#:1

P Sec:001 Month:July 2015
KH0012 -AGENCY EDUCATION OFFICER K
Min. Of K.A & N.A & S.F.R

Pers #: 00524096 Buckle:
Name: ROQYYA BIBI
THEOLOGY TEACHER
CNIC No.2710124763456
GPF Interest Applied
14 Vocational Temporary

NTN:
GPF #:
Old #:

KH0012 -0042

PAYS AND ALLOWANCES:

0001-Basic Pay	15,870.00
1000-House Rent Allowance	1,476.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,700.00
1948-Adhoc Allowance 2010@ 50%	3,030.00
2148-15% Adhoc Relief All-2013	1,840.00
2174-Adhoc Relief Allow-2014	1,166.00
2198-Adhoc Relief All 7.5%	1,190.00
Gross Pay and Allowances	30,628.00

DEDUCTIONS:

GPF Balance 63,882.00	Subrc:	1,372.00
3661-E.E.F (Exchange)		100.00
3701-Benevolent Fund(Exchange)		180.00
3704-Group Insurance(Exchange)		115.00
3711-Addl Group Insuranc(Exch)		13.00

Total Deductions	1,780.00
	28,848.00

D.O.B	LFP Quota:
03.04.1978	HABIB BANK LIMITED UMARZAI
15 Years 02 Months 012 Days	18577100000403

(13)

khyber

S#:1

P Sec:001 Month:July 2016
KH0012 -AGENCY EDUCATION OFFICER K.
Min. Of K.A & N.A & S.F.R
NTN:
GPF #:
Old #:

Pers #: 00524096 Buckle:
Name: ROQYYA BIBI
THEOLOGY TEACHER
CNIC No.2710124763456
GPF Interest Applied

14 Vocational Temporary
PAYS AND ALLOWANCES:

KH0012 -0042

0001-Basic Pay	20,560.00
1000-House Rent Allowance	1,476.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,700.00
1948-Adhoc Allowance 2010@ 50%	3,030.00
2148-15% Adhoc Relief All-2013	613.00
2199-Adhoc Relief Allow @10%	417.00
2211-Adhoc Relief All 2016 10%	2,056.00
Gross Pay and Allowances	34,208.00

DEDUCTIONS:

IT Payable	48.07	Deducted	5.00	TAX:(3609)	5.00
GPF Balance	83,973.00			Subrc:	1,775.00
3661-E.E.F (Exchange)					100.00
3701-Benevolent Fund(Exchange)					180.00
3704-Group Insurance(Exchange)					115.00
3711-Addl Group Insuranc(Exch)					13.00

Total Deductions 2,188.00

32,020.00

D.O.B 03.04.1978
16 Years 02 Months 012 Days

LFP Quota:
HABIB BANK LIMITED UMARZAI
18577100000403

(14)

khyber

S#:1

P Sec:001 Month:December 2014
KH0012 -AGENCY EDUCATION OFFICER K
Min. OF K.A & N.A & S.F.R

Pers #: 00524096 Buckle:

Name: ROQYYA BIBI
THEOLOGY TEACHER

NTN:
GPF #:
Old #:

CNIC No.2710124763456

GPF Interest Applied

14 Vocational Temporary

KH0012 -0042

PAYS AND ALLOWANCES:

0001-Basic Pay	12,270.00
1000-House Rent Allowance	1,476.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,200.00
1528-Unattractive Area Allow	1,700.00
1948-Adhoc Allowance 2010@ 50%	3,030.00
1970-Adhoc Relief Allow 2011	909.00
2118-Adhoc Relief Allow (2012)	2,454.00
2148-15% Adhoc Relief All-2013	1,840.00
Gross Pay and Allowances	28,962.00

DEDUCTIONS:

GPF Balance 54,278.00	Subrc:	1,372.00
3661-E.E.F (Exchange)		100.00
3701-Benevolent Fund(Exchange)		180.00
3704-Group Insurance(Exchange)		115.00
3711-Addl Group Insuranc(Exch)		13.00

Total Deductions

1,780.00

27,182.00

D.O.B
03.04.1978

14 Years 07 Months 012 Days

LFP Quota:
HABIB BANK LIMITED UMARZAI
18577100000403

15

khyber

S# : 1

P Sec:001 Month:December 2015
KH0012 -AGENCY EDUCATION OFFICER K
Min. OF K.A & N.A & S.F.R

Pers #: 00524096 Buckle:
Name: ROQYYA BIBI
THEOLOGY TEACHER
CNIC No.2710124763456
GPF Interest Applied
14 Vocational Temporary

NTN:
GPF #:
Old #:

KH0012 -0042

PAYS AND ALLOWANCES:

0001-Basic Pay	16,660.00
1000-House Rent Allowance	1,476.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,700.00
1948-Adhoc Allowance 2010@ 50%	3,030.00
2148-15% Adhoc Relief All-2013	1,840.00
2174-Adhoc Relief Allow-2014	1,227.00
2199-Adhoc Relief Allow @10%	1,666.00
Gross Pay and Allowances,	33,940.00

DEDUCTIONS:

GPF Balance 71,548.00	Subrc:	1,775.00
3661-E.E.F (Exchange)		100.00
3701-Benevolent Fund(Exchange)		180.00
3704-Group Insurance(Exchange)		115.00
3711-Addl Group Insuranc(Exch)		13.00

Total Deductions

2,183.00

31,757.00

D.O.B
03.04.1978
15 Years,07 Months 012 Days

LFP Quota:
HABIB BANK LIMITED UMARZAI
18577100000403

(For use in Police Department only)

Heirs:

- 1. passed of SSC Examination From
- 2. BISE, Peshawar in Session of Supply marks
- 3. 2007, Under Roll no. 2164 obtained marks 343/850

Verification Roll No. [Signature] dated _____ received back _____

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD.

Left Thumb Impression

passed of Shahade Tul
Alimia Waqar Madani

Qualification ② - passed of BA Examination Date Exam Qualification passed ten years 2015 public

English From BISE Peshawar in the session of 2004 (Supply) Under Roll no. 5779 obtained Marks 266/600

Pushto Marks 569/1100 B.L. Or B.A.

Urdu AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD. AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD. Pleadership examination

Plan-drawing Training School Final examination

Finger Print ③ passed of BA Examination Other qualification:-

Drill Instructing From University of Peshawar

Court Duties in the session of 2008 Annual Under Roll no. 78374 obtained

Reserve Duties Marks 249/550 ⑤ Shahade Tul Saman

AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD. Alimia Waqar Madani

AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD. Session 2004 Roll 30295

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

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

1. Name: ROQIA BIBI

2. Race: ISLAM

3. Residence: P/O UMARZAI DIST CHARBANDA ART KOTANS
UMARZAI


4. Father's name and residence: ARIF ULLAH


5. Date of birth by Christian era as nearly as can be ascertained: FOURTEEN APRIL N.H. EIGHTY SIX
14-04-1986


6. Exact height by measurement: 5-5"


7. Personal marks for identification: NIL

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

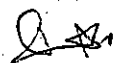
Little Finger 

Ring Finger 

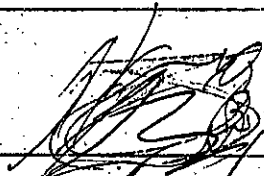
Middle Finger 

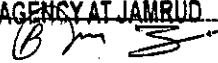
Fore Finger 

Thumb 

9. Signature of Government Servant: 

10. Signature and designation of the Head of the Office, or other Attesting Officer.

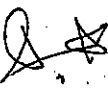
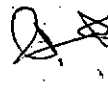
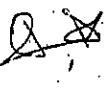
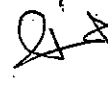
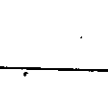

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD


1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "up"	Date of appointment	Signature of Government Servant.
TT, TT.							
GIGPS Lalji Kalli Shalobari Banga Khilber Agency.			BPS No 7 (3530-190-9230)	Rs = 3530/PM		1 ⁹ / ₂₀₀₉	Q*
			Rs = 3530/PM			1 ¹² / ₂₀₀₉	Q*
			Rs = 3720/PM			1 ¹² / ₂₀₁₀	Q*



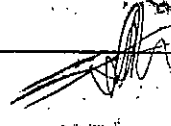


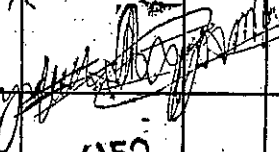

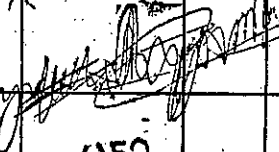
Revised of pay BPS-07 (5800-320-15400)

9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to an recorded punishment or censure or praise of the Government Servant.	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government			
					Period			Government to which debitible.
AEO KHYBER	11/08/2009	Nil	AEO KHYBER				Appointment against The T.T.	
AEO KHYBER	11/30/2009	Nil	AEO KHYBER				Post on Regular Basic BPS 07 @ Rs. (3530-190-9230)	
AEO KHYBER	11/30/2010	(A) Increment	AEO KHYBER				Plus used Allowances as admissible under the rules A.E.O. Khyber Encl-1	
AEO KHYBER	6/30/2011	Revised of pay	AEO KHYBER				No. 4070-76/6306/A-1/F/ Khyber Dated 28-08-2009,	
AEO KHYBER	11/30/2011	Annual Inc.	AEO KHYBER					
AEO KHYBER	11/30/2012	(A) Increment	AEO KHYBER				AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD	
AEO KHYBER	11/30/2013	Annual Increment	AEO KHYBER					
AEO KHYBER	11/30/2014	(A) Increment	AEO KHYBER					
							Revised of pay submitted allowed BPS-14 per standard plus with immediate effect	
							AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD	

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "p"	7 Date of appointment	8 Signature of Government Servant
		<u>BPS 14</u>	8500	700	29500		
			Ps - 8500			10/2014	
			Ps - 8610	8000 PM		12/2014	
		<u>Revised pay B-14 (10345 - 280 - 34040)</u>					
			Ps - 11130			7/2015	
			Ps - 11920			12/2015	

P. NO. 524096-7

(21)

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Period	Government to which debitable						
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.			Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
 AEO KHYBER	10 24/11/14	renewed BPS-14	 AEO KHYBER				
 AEO KHYBER	11 30/2014	Am) new	 AEO KHYBER			Secy Mr. Usman	
 AEO KHYBER	6 30/15	Revised & pay	 AEO KHYBER			From 1-10-2014 to 30-11-2015 from the bill and other record of this office	
 AEO KHYBER	30/2015	As new	 AEO KHYBER			AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMPUD.	

(22)

بخدمت جناب ڈائریکٹر صاحب ایجوکیشن خیبر پختون خواہ پشاور

عنوان: سائلہ کی تنخواہ جاری کرے۔ اور ڈیوٹی پر تعینات کرنے کی اجازت دی جائے

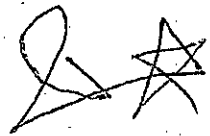
جناب عالی!

نہایت ادب سے گزارش کی جاتی ہے کہ سائلہ گورنمنٹ گرلز پرائمری سکول لطیف گلے شلوبر تحصیل باڑہ میں بھرتی ہوئی تھی۔ لیکن اس وقت باڑہ تحصیل کے حالات خراب تھے اور تمام تحصیل کے سکول بند تھے۔ اور سائلہ کو Re-deployed کے طور پر تحصیل جمروڈ میں گورنمنٹ گرلز پرائمری سکول حیات شاہ جمروڈ عارضی طور پر تعینات کیا۔ لیکن سکول بہت دور تھا اور سائلہ کے اس وقت چھوٹے چھوٹے بچے تھے۔ اور وہاں پر ڈیوٹی کرنا مشکل تھا۔ سائلہ کو دوبارہ Re-deployed گورنمنٹ گرلز پرائمری سکول مثل خان گلے میں تعینات کیا گیا۔ جس پر نظر ثانی کیلئے اس سے پہلے بھی کئی بار ایجنسی ایجوکیشن آفیسر جمروڈ کو درخواستیں دی ہیں مگر کوئی شنوائی نہیں ہوئی۔ لہذا آپ صاحبان سے درخواست کرتی ہوں کہ سائلہ کی تنخواہ جاری کرنے کے احکامات صادر فرمائی جائے اور سائلہ کو ڈیوٹی پر تعینات کرنے کی اجازت دی جائے تاکہ سائلہ اپنی ڈیوٹی احسن طریقے سے سرانجام دیں۔ سائلہ کی سروس کاغذات درخواست کے ساتھ منسلک ہیں۔

آپ کی عین نوازش ہوگی۔

تاریخ: 30-03-2023

العارض







روقیہ بی بی ٹی سکول ٹیچر

پرسنل نمبر: 524096

پتہ: محلہ بامت خیل، عمرزئی، تحصیل ضلع چارسدہ

رابطہ نمبر: 0314-9818740 0324-9833798

dairy No: 1094 date: 04.04.2023

قیمت 50 روپے	5388	پشاور بار ایسوسی ایشن، خیبر پختونخوا	
ایڈویکٹ: 		  	
بار کونسل ایسوسی ایشن نمبر: BE-10-9467			
رابطہ نمبر: 0334-9166814			

بعدالت جناب: مسرہ صا ٹریبونل کا ججی ہے

منجانب: <u>میشنرز</u>	دعویٰ: <u>ادیل</u>
رقبہ فی بی بنام ادیحو کسین	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام لسٹڈ کیلئے محمد عدنان بیٹے، حکیم گل اور ادیحو کسین مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا بندہ نہیں ہوں گے کہ پیروی مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



المرقوم: 03/08/2023

بدا واد شد العبد
 مقام _____ کے لیے منظور ہے۔
 Accept
 Accept

رقبہ فی بی بنام ادیحو کسین
 بلوچ طارق
 بلوچ طارق
 کسین و ضلع طارقہ