

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL, PESHAWAR.**

CM No. \_\_\_\_\_/2023

In Service Appeal No. 417/2022

Naseer Ahmed

**VERSUS**

**Deputy Commissioner Mohmand & Others**

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**Dated: 22-11-2023**

*Naseer*  
Applicant/Appellant

Through

*Javed*  
**JAVED IQBAL GULBEIG**  
Advocate Supreme Court,  
Pakistan.

*N.D*  
*28-12-2023*  
*Peshawar.*

①

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL, PESHAWAR.**

CM No. \_\_\_\_\_/2023

In Service Appeal No. 417/2022

9347

22-11-2023

Naseer Ahmed

**VERSUS**

**Deputy Commissioner Mohmand & Others**

**Application For Placing On File Additional Documents In The**  
**Above Mentioned Service Appeal**

*Respectfully Sheweth,*

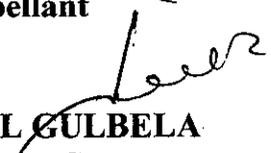
1. That the above titled case is pending adjudication before this Hon'ble Tribunal and next date of hearing is 28-12-2023.
2. That the following additional documents accompanied herewith are necessary for just and proper disposal of the above titled case. **(Copies of the Additional Documents are annexed as "AA")**
3. That there is no legal bar in bringing on record the document for the conclusion of the case.

*It is therefore most humbly prayed that on acceptance of this application, the above mentioned additional document may kindly be considered part and parcel of the above mentioned Service Appeal and same may kindly be included in the main Service Appeal.*

**Dated: 22-11-2023**

  
Applicant/Appellant

*Through*

  
**JAVED IQBAL GULBELA**  
Advocate Supreme Court,  
Pakistan.

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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL, PESHAWAR.**

CM No. \_\_\_\_/2023

In Service Appeal No. 417/2022

Naseer Ahmed

**VERSUS**

**Deputy Commissioner Mohmand & Others**

**AFFIDAVIT**

I, Naseer Ahmed S/o Bashir Ahmed, R/o District Charsadda do hereby solemnly affirm and declare on oath that all the contents of the **application** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

*Naseer*  
**DEPONENT**

*Naseer Ahmed*

**CNIC: 17101-9686295-9**

**Cell No: 0333-9797534**

Identified by:

*Naseer*  
**JAVED IQBAL GULBELA**  
Advocate Supreme Court  
Pakistan.



*22/11/23*

OFFICE OF THE POLITICAL AGENT MOHMAND, GHALLANAI.

Annexure "AA"

OFFICE ORDER.

Consequent upon the promotion of Mr. Neseer Ahmad son of Bashir Ahmad in B-S-3 to BPS-5, Mr. Neseer Ahmad son of Bashir Ahmad Ex-Senior Clerk is hereby appointed as Khassadar Moharrir in BPS-3 with immediate effect, subject to the production of Medical Fitness Certificate.

2

Political Agent Mohmand,  
Ghallaanai.

No. 144/8 Dated Ghallaanai, the 15/11/86

Copy forwarded to the:-

- 1. Advocate General, Peshawar High Court, Peshawar for information. *with reference to his memo. No. 3287-88/AGP dt 22-6-86.*
- 2. The Agency Accounts Officer, Mohmand Ghallaanai.
- 3. The Khassadar Clerk.
- 4. *The Official Concerned.*

Political Agent Mohmand,  
Ghallaanai.

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

Better Copy

**OFFICE OF THE POLITICAL AGENT MOHMAND GHALLANAI**

**OFFICE ORDER**

Consequent upon the promotion of Mr. Amjad Ali Khasadar Moharrar in BPS-3 to BPS-5, Mr. Naseer Ahmad S/o Bashir Ahmad Ex-Senior Clerk is hereby appointed as Khasadar Moharrar in BPS-3, with immediate effect, subject to the production of medical fitness certificate.

Political Agent Mohmand  
Ghallanai

No.14468 /accountant dated Ghallanai, the 18/11/1996

Copy forwarded to the:

1. Advocate General Peshawar High Court for information with reframe to his memo No.3287-88/23-06-96
2. The Agency Account Officer, Mohmand Ghallanai
3. The Khasadar Clerk.
4. The Official concerned.

Political Agent Mohmand  
Ghallanai

AMJED MOHAMMAD  
Supreme Court of Pakistan  
(ASC # 5317)

OFFICE OF THE POLITICAL AGENT MOHMAND AT GHALLANAI.

ORDER.

In pursuance of approval of the departmental committee the following ministerial staff are hereby promoted against the posts mentioned against their names with effect from 12.11.2007.

- |  |  |
|--|--|
| 1. Haji Dil Aram Junior scale Stenographer | promoted to the post of S.S. Stenographer ( BPS 15 ) |
| 2. Hazrat Khan S/Clerk                     | promoted to the post of Assistant ( BPS-11 )         |
| 3. Mr. Imdad Khan J/Clerk                  | promoted to the post of S/Clerk.                     |
| 4. Mr. Samin Khan J/Clerk                  | promoted to the post of S/Clerk.                     |
| 5. Mr. Ihsan ud Din J/Clerk                | promoted to the post of S/Clerk.                     |
| 6. Mr. Gohar Ali J/Clerk                   | promoted to the post of S/Clerk.                     |
| 7. Mr. Abdur Rehman Moharrir               | promoted to the post of J/Clerk.                     |
| 8. Mr. Naseer Ahmad Moharrir               | promoted to the post of J/Clerk.                     |
| 9. Mr. Mohibullah N/Qasid                  | promoted to the post of Moharrir.                    |
| 10. Mr. Anwar Shah N/Qasid                 | promoted to the post of Moharrir.                    |
| 11. Mr. Noor Muhammad Mali                 | promoted to the post of Moharrir                     |

*Hezari Muz*  
Political Agent Mohmand  
at Ghallanai

No. 10419-23 /Acctt:

Dated Ghallanai the 27-11. 2007

Copy to:

1. The Assistant Political Agent Upper Mohmand at Ghallanai.
2. The Agency Accounts Officer Mohmand at Ghallanai.
3. The Section Officer ( Estb ) Civil Secretariat FATA Peshawar.
4. Accountant for necessary action (completion of service books).
5. Officials concerned.

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

*Hezari Muz*  
Political Agent Mohmand  
at Ghallanai

5

DI — COMMISSIONER  
MOHMAND TRIBAL DISTRICT

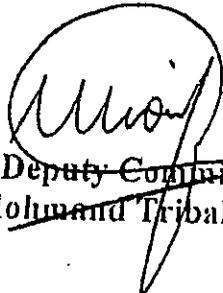
Phone No. 0924-290001 Fax No. 0924-290075 Email: pmohmand@gmail.com

ORDER

Dated Ghallanai the 31/10/2018.

As recommended by Departmental Promotion Committee in its meeting held at Ghallanai on 29<sup>th</sup> October, 2018, the following Junior Clerks (BPS-11 (12570-880-38970) are hereby promoted to the post of Senior Clerks (BPS-14) (15180-1170-50280) with immediate effect as per details given against each:-

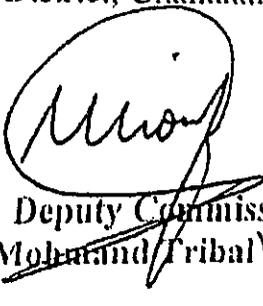
1. Mr. Amjad Ali son of Haroon Rashid.
2. Mr. Abdul Wakeel son of Khaista Rehman.
3. Mr. Meraj Muhammad Khan son of Muhammad Ghulam.
4. Mr. Abdur Rehman son of Muhammad Akram.
5. Mr. Naseer Ahmad son of Bashir Ahmad.
6. Mr. Shams ur Rehman son of Haji Abdul Manan.

  
Deputy Commissioner  
Mohmand Tribal District

No. 9007-10 /Acctt:

1. Secretary, AI&C Department, FATA Secretariat, Peshawar.
2. Assistant Commissioner, Lower Mohmand Tribal District Ekkaghund.
3. Agency Accounts Officer, Mohmand Tribal District, Ghallanai.
4. Officials Concerned.

  
JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

  
Deputy Commissioner  
Mohmand Tribal District



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Office of the  
DISTRICT ACCOUNTS OFFICER  
MOHMAND AT GHALLANAI

No: Admn/DAO/Mohmand/2022-23/ 09.  
To

Dated: 02.01.2023

✓ The Deputy Commissioner  
Mohmand at Ghallanai

**SUBJECT: IRREGULAR DRAWAL OF SALARIES IN R/O NASEER AHMED S/O. BASHIR AHMED UNDER INVALID COST CENTER MG4004 POLITICAL AGENT MOHMAND.**

Please refer to the subject noted above and it is stated that during post audit of computer SAP system this office pointed out that the above named official drawing his Pay & Allowances in invalid cost center MG4004 since 07/2021 to till date.

After scrutiny of computer source record, this office observed that your good department submitted source for pay activation/release in the month of 07/2021 under invalid Cost Center (MG4004) and the pay/salary was started under invalid cost center. He also has drawn arrears in Pay & Allowances in the month of 10/2021 and 04/2022 through computer source. Resultantly the impact goes to budget and negative balances occur in reconciliation statement. In this regards, it is to inform that the Salary/ Pay for the month of December 2022 of the above named official has been stopped by this office till the verification at your end please.

In light of above it is requested that the matter may please be investigated at your own level and factual position be intimated to this office.

Acctt

For immediate  
at a place

AS  
Admn 5/1/23

Signature  
DISTRICT ACCOUNTS OFFICER  
MOHMAND AT GHALLANAI

02/01/2023

JAVED IKBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

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**Office of the DISTRICT ACCOUNTS OFFICER**

Phone: 0924-290234

MOHMAND

No. DAO/MND/ADMIN/2022-23/ 53-54

Dated. 10.04.2023

To,

The Finance Officer/Inquiry Officer  
Tribal District Mohmand.

**SUBJECT: INQUIRY REPORT REGARDING IRREGULAR DRAWAL OF SALARIES IN R/O NASEER AHMAD S/O BASHIR AHMAD UNDER INVALID COST CENTER MG4004 POLITICAL AGENT MOHMAND.**

Refer to yours office letter NO.616-17/ADC (F&P) Dated 28.03.2023 on the subject cited above & to invite your attention to the recommendation of the inquiry conducted by your good self in the light of this office vide letter NO.ADMN/DAO MOHMAND/2022-23/09 Dated 02.01.2023, in order to save the official from financial hardship he may be adjusted against the vacant post for the purpose of pay till the outcome of the decision of Honorable Service Tribunal.

Furthermore the salaries drawn under MG 4004 POLITICAL AGENT MOHMAND may be shifted to the cost centre under which he may be adjusted for the purpose of drawl of pay via transfer entry to eradicate the negative balances in the reconciliation statement.

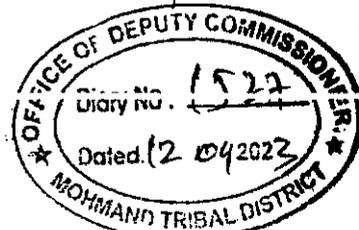
DISTRICT ACCOUNTS OFFICER  
MOHMAND

Copy forwarded to:

- i. Deputy Commissioner Mohmand Tribal District for information please.

Acctt:  
For info & nla as per rules.  
DCA  
10/04/23

*[Signature]*  
DISTRICT ACCOUNTS OFFICER  
MOHMAND



JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)



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**OFFICE OF THE  
ADDITIONAL DEPUTY COMMISSIONER  
MOHMAND TRIBAL DISTRICT**

Phone 0924-290189 Fax 0924-290075 Email: [pamohmand@gmail.com](mailto:pamohmand@gmail.com)

No.Acct/DC (Mohmand)/ 5699-703

Dated 06/10/2023

**OFFICE ORDER.**

In light of District Account Office, District Mohmand letters No. DAO/MND/ADMIN/2022-23/53-54 dated 10-04-2023 and No.Admin/Pay Roll/DAO/Mohmand/2022-23/126-27 dated 10-05-2023, the Competent Authority, i.e Deputy Commissioner, District Mohmand is pleased to adjust Mr. Nasser Ahmad, Senior Clerk (BS-14) against the vacant post of Senior Clerk (BS-14) in the office of Deputy Commissioner, Tribal District Mohmand, under Para-113 of G.P.R. Vol-I for the purpose of pay till the outcome/final decision of KP, Service Tribunal Peshawar

Deputy Commissioner  
Mohmand Tribal District

Copy forwarded to:

1. The Accountant General, Mohmand Tribal District w/r to his letters No. and date cited above.
2. The Commissioner, Peshawar Division, Peshawar.
3. The Addl: Deputy Commissioner (G) Distt: Mohmand.
4. Office file.

JAVED ICSAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)



PAYROLL SYSTEM  
AMENDMENT FORM  
SINGLE EMPLOYEE ENTRY

OFFICE OF THE Deputy Commissioner Multan  
FOR THE MONTH OF June 1 200 23

DDO Code (Cost Center) MG600 Description

Personnel Number 00106449

Employee Name MR. NASEER AHMAD

National ID Card Number

Grade (Pay Scale Grade) 1.4 Senior Clerk

Salary Status  Stat  Step

Page No: 2  
JAVED KHAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

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Info Type	Field ID	GENERAL DATA CHANGE	New Contents	Wage Type	CHANGE IN PAYMENTS / DEDUCTIONS			Effective Date	Remarks
					Steps	Amount	Paiss Adj		
			Basic pay	0001	32370 1/2	5801	3022 1/2	01/12/2022	Existing pay
			Conveyance allow:	1210	2856 1/2	5002	1792 1/2		4/2022 pay increase
			Medical allow:	1300	1500 1/2	5011	17136		due chg of 11/9, we
			UTA -	1528	1000 1/2	5102	6000		01/12/2022 Now as p
			ARA	2148	537 1/2	5309	3222		Policy under GPF part
			Special allow:	2315	3500 1/2	5149	21000		113 vol-1 payman p
			Dispersible allow:	2341	4910 1/2	5135	29460		on temporary basis
			ARA 2022	2347	4710 1/2	5940	29460		best part held 25/12/2022
					22904		437420 1/2		also pass in work
									01/12/2022 copy sent
									is also attached

[Signature]  
Prepared By 23

Audited/Checked By 24

[Signature]  
Deputy Commissioner  
Multan District