


FORM OF ORDER SHEET

Court of _____

Appeal No. 2598/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	18/12/2023	<p>The appeal of Mr. Mansoor Ahmad Khan presented today by Mr. Umar Farooq Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 2598 /2023

MANSOOR AHMAD KHAN

VS

EDU: DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	
2.	Copy of appointment order dated 11/07/2020	A	
3.	Copies of Charge Report & Service Book	B	
4.	Copy of source of pay and pay slip	B/1	
5.	Copy of order dated 14/07/2020	C	
6.	Copy of order dated 24/01/2022	D	
7.	Copy of letter dated 02/08/2023	D/1	
8.	Copy of the letter dated 28/02/2023	E	
9.	Copy of impugned order dated 16/08/2023	F	
10.	Copy of departmental appeal	G	
11.	Wakalat Nama		

APPELLANT

Through:


UMAR FAROOQ MOHMAND
ADVOCATE HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 2848 /2023

Mr. Mansoor Ahmad Khan, Ex-PST
GPS Qadai Khel, District Mohmand

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 3- District Education Officer, District Mohmand

..... **RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 16/08/2023, WHEREBY THE APPOINTMENT ORDER OF THE APPELLANT WAS DISOWNED BY THE RESPONDENTS AND INACTION FO THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STIPULATED PERIOD OF 90 DAYS.

PRAYER:

That on acceptance of this appeal the impugned order dated 16/08/2023 may very kindly be set aside and the appellant may kindly be re-instated into service with all consequential back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/S WETH:

ON FACTS:

1. That appellant was initially appointed as PST (BPS-12) after proper approval of the District Selection Committee vide order dated 11/07/2020 and after appointment the appellant started performing his duty quite efficiently and to the entire satisfaction of his high ups. Copy of appointment order is attached as annexure.....**A**
2. That after appointment, the petitioner submitted his charge report, whereafter service book of the petitioner was prepared and salaries of the appellant has been released. Copies of Charge Report & Service Book are attached as annexure.....**B**
3. That after assumption of charge, the respondent department prepared the source of the salary of the appellant after

fulfilling all the codal formalities. Copy of source of pay is attached as annexure.....**B/1**

4. That it is important to mention here that vide order dated 14/07/2020, the appellant has been transferred/deployed from GPS Selai and deployed through GPS Qadi Khel, Malik Lal Khan Khawazai. Copy of order dated 14/07/2020 is attached as annexure.....**C**
5. That while performing his duties the appellant was applied for study leave for a period with effect from 01/02/2022 to 31/01/2024, which has been granted to the appellant vide order dated 24/01/2022. Copy of order dated 24/01/2022 is attached as annexure.....**D**
6. That it is important to mention here that the District Account officer District Mohmand through letter dated 02/08/2023, provide full detail of the salaries of the appellant to the respondent department. Copy of letter dated 02/08/2023 is attached as annexure.....**D/1**
7. That while performing his duties, vide letter dated 28/02/2023 the salaries of the appellant has been stopped without any reason and justification, despite the fact that the appellant performing his duties as his concerned school. Copy of the letter dated 28/02/2023 is attached as annexure.....**E**
8. That the appellant approached to the respondent No 3 for release of his monthly salaries, but astonishingly the respondents issued the impugned order dated 16/08/2023, whereby the appointment order of the appellant has been disowned without conducting regular inquiry into the matter. Copy of impugned order dated 16/08/2023 is attached as annexure.....**F**
9. That the appellant feeling aggrieved from the impugned order dated 16/08/2023, the appellant filed Departmental appeal before the competent authority, but no reply has been received so far. Copy of departmental appeal is attached as annexure.....**G**
10. That appellant feeling highly aggrieved from the impugned order dated 16/08/2023 passed by the respondents and having no other remedy but to file the instant appeal on the following grounds amongst the others:-

GROUND:

- A- That impugned order dated 16/08/2023 passed by the respondents is void in nature against the law, facts and norms of natural justice, hence not tenable and is liable to be set aside.

- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the codal formalities required for the major penalty has not been fulfilled by the respondents while issuing the impugned order dated 16/08/2023.
- D- That no Show Cause Notice has been issued to the appellant by the respondent, before issuing the impugned order dated 16/08/2023.
- E- That no charge sheet and statement of allegation has not been issued to the appellant before issuing the impugned order dated 16/08/2023.
- F- That no chance of personal hearing/defense has been provided to the appellant before issuing the impugned order.
- G- That, the respondent Department acted in arbitrary and malafide manner while issuing the impugned order dated 16/08/2023.
- H- That, no regular or fact-finding inquiry has been conducted in the matter which is pre-requisite as per the judgments of the Apex Supreme Court of Pakistan in punitive matters.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that appeal of the appellant may be accepted as prayed for.

Dated: 15/12/2023

THROUGH:

APPELLANT

UMER FAROOQ MOHMAND

MAHMOOD JAN

WALEED ADNAN

&

KHANZAD GUL

ADVOCATES HIGH COURT

AFFIDAVIT

I, Mansoor Ahmad Khan, Ex-PST GPS Qadai Khel, District Mohmand, do hereby solemnly affirm and declare that the contents of the accompanying **Appeal** true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

DEPONENT





OFFICE OF THE DISTRICT EDUCATION OFFICER

MOHMAND TRIBAL DISTRICT
PH. No. 92 : 0924-290180

FAX : 0924290180

Email :- deomohmand@gmail.com



APPOINTMENT ORDER.

In compliance of the competent authority Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Letter No.2492/F-6/Guidance/Recruitment (M&P) and consequent upon the recommendations of the Departmental Selection Committee, appointment of the following male candidates are hereby ordered against the post of PST male School based in BPS-12@ (13320-903-42120) @ Rs. 13320/- fixed plus rest of allowances as admissible under the rules on adhoc basis and on Contract basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below: -

S.#	Name	Father Name	Name of school	Remarks
1.	Mansoor Ahmad Khan	Taj Munir	GPS Selai	A.V.P

TERMS & CONDITIONS.

- No TA/DA is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely on temporary & contract basis initially for one year.
- Appointment is subject to the condition that the certificates/degrees must be verified from the concerned authorities by Office of the District Education Officer Mohmand Tribal District. Any one found producing bogus Documents / Testimonials will be reported to the law enforcing agencies for further action.
- Their services are liable to termination on One Month notice from either side. In case of resignation without notice their One Month pay/allowances shall be forfeited to the Government.
- Pay will not be drawn until and unless a certificate to this effect by Office of the District Education Officer Mohmand is issued that his certificates/degrees are verified.
- They should join their posts within 15 days. In case of failure to join their posts within 15 days, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
- Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- Before handing over charge they will sign an agreement with the department, otherwise their order will not be valid.
- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- They will get 09 months in service, mandatory professional induction training from RITE, PITE or FITE.
- Their services shall be terminated at any time, in case one's performance is found unsatisfactory during his contract period. In case of misconduct, He shall be proceeded under the rules framed from time to time.
- Their appointment is School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
- Before handing over charge once again their documents may be checked if they have not the required qualification they may not be handed over charge.
- They should not be handed over charge if he exceeds thirty five (35) years or below nineteen (19) years of age.
- If any meritorious candidate is deprived from appointment by this order and the competent authority accepted his appeal, the appointment order of the low merit candidate will be withdrawn and adjustment order will be reviewed/revised according to the merit.
- Drawing & Disbursing Officer should personally verify this order from the Office of the DEO Mohmand Tribal District before handing over charge to the officials.
- District Account Officer (DAO) Mohmand should released their salaries on the production of duty certificate duly signed by the principal /IIM/DDO concerned and countersigned by District Education Officer Mohmand.

(Mr. Juddi Khan Khalil)
District Education Officer
Mohmand Tribal District

Endst: No.

2425-30

Dated 11/07/2020.

Copy forwarded for information and necessary action to:

- Director Elementary and Secondary Education Khyber Pakhtunkhwa.
- PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
- Deputy Commissioner, Mohmand Tribal District.
- District Account Officer Mohmand Tribal District.
- ADEO Concerned.
- Pay Clerk Local Office.
- Officials Concerned.
- M/File

District Education Officer

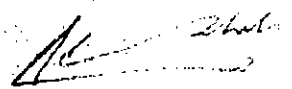
CHARGE REPORT

Certified that I, **Mansoor Ahmad Khan** took over charge against vacant PST post at GPS Selai tehsil Baizai Distt, Mohmand today on 12/07/2020 (AN) vide DEO Mohmand office Endst;2925-30 dated 11/07/2020.

Signature of Govt Servant

Receiving Charge MJ Sohr

Designation Pst



District Education Officer
Mohmand

(For use in Police Department only)

Heirs: ① - Passed SSC examination from Islamabad Federal Board obtained marks 489/1100 session 2015
 1. Result Declaration 27/05/2015 under Roll No. 122287
 2. _____
 3. _____

Verification Roll No. _____ dated _____ received back _____
 ② - Passed F.Sc examination from Islamabad Federal Board obtained marks 901/1100 under Roll No. 526757 Result Declared 30/07/2017 -

Left Thumb Impression

[Signature]
 District Officer
 District Office

Qualification	Date	Qualification	Date
③ - Passed B.A Examination from University of Peshawar Under Roll No. 23162 obtained marks 346/550 Result Declared English 25/09/2019.		First Arts	
Pushto		B.L. Or B.A. <i>[Signature]</i> District Officer	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger-Print		Other qualification:-	
Drill Instructing			
Court Duties			
Reserve Duties			

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 of lines 9 and 10 should be dated.


1. Name: MANSOOR AHMAD KHAN
2. Race: Pashtun
3. Residence: Mohmand Tribal district.

4. Father's name and residence: Taj Munnir

5. Date of birth by Christian era as nearly as can be ascertained: 30.03.1999

6. Exact height by measurement: 5' 6"

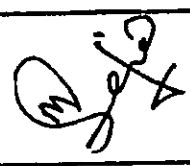
7. Personal marks for identification: Nil

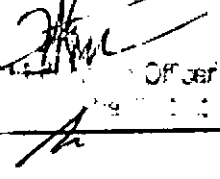
8. Left hand thumb and finger impression of (Non-Gazetted) officer: 

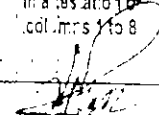


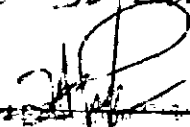
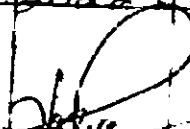

Little Finger  Ring Finger 

Middle Finger  Fore Finger 

Thumb 

9. Signature of Government Servant: 

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

8	9	10	11	12		13
Name of Government Servant	Signature and Designation of the head of the office or other attesting officer in a case of leave or in cases of termination of appointment.	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.	Nature and duration of leave taken	Reference to a record or point of appointment or of the Government Servant.
				Leaves		Signature of the head of the office or other attesting officer
				Allocation or period of leave or average pay upto four months for which leave salary is debitable to another Government		Reference to a record or point of appointment or of the Government Servant.
				Period		Signature of the head of the office or other attesting officer
				Governor's order to which it is applicable		Reference to a record or point of appointment or of the Government Servant.
	 D.E.O. Mohmand	30/11/2021	Promotion	 D.E.O. Mohmand	Appointment as D.E.O. at GRS Selaibi	
	 D.E.O. Mohmand				D.E.O. Mohmmad order No 2925-30 dated 11/2/2022	
					 D.E.O. Mohmand	
					allowed Study leave w.e.f 1/2/2022 to 31/1/2024 vide D.E.O. Mohmmad order No-453-54 dt 24/01/2022	
					 District Education Officer Mohmand Tribal District	
					Service verified w.e.f 11/2/2022 to 30/11/2021 from this office record.	
					 District Education Officer Mohmand Tribal District	

RECEIVED

PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

FORM: PAY02
Date: _____



OFFICE OF THE District Education Officer Mohmand Tribal District

FOR THE MONTH OF 12/2020

DDO Code (Cnst Center)

M	G	6	0	1	3
---	---	---	---	---	---

 Description Primary Schools DEO Mohmand

Personnel Number

--	--	--	--	--	--	--	--	--	--

 Employee Name Mansoor Khan National ID Card Number
Grade Pay Scale Group

1	2
---	---

 PST Start Stop

Info ¹⁴ Type	Field ID ¹⁵	GENERAL DATA CHANGE ²		CHANGE IN PAYMENTS / DEDUCTIONS ¹⁷					Effective Date ²⁰	Remarks
		New Contents ¹⁶	Wage ¹⁸	Pay for the month of 01/2020.	21 Days	Months	Adj Code	Amount ¹⁹ Adjustment		
		Basic Pay	0001	13320	9023.23	4	5801 Adj	53280	62303.2	11/07/2020 to 30/11/2020 (4 Months and 21 Days) 2. Pay may also be transferred to ABL Ghallanai of Branch Code No. 1123 A/c No.0010074075390010.
		HRA	1000	1961	1328.42	4	5002 Adj	7844	9172.42	
		Conveyance Allowance	1210	2856	1934.71	4	5011 Adj	11424	13358.7	
		UAA	1528	1500	1016.13	4	5102 Adj	4500	5516.13	
		Medical Allowance	1300	1500	1016.13	4	5012 Adj	6000	7016.13	
		Charge Allowance	1505	0	0	0		0	0	
		AR-2013 5%	2148	350	237.097	4	5309 Adj	1400	1637.1	
		AR-2015 2.50%	2199	227	153.774	4	5984 Adj	908	1061.77	
		AR-2016 10%	2211	1114	754.645	4	5336 Adj	4456	5210.65	
		AR-2017 10%	2224	1332	902.323	4	5322 Adj	5328	6230.32	
		AR-2018 10%	2247	1332	902.323	4	5975 Adj	5328	6230.32	
		AR-2019 10%	2264	1332	902.323	4	5990 Adj	5328	6230.32	
G:Total:				26824	18171			105796	123967	
		GPF	3015	2220	1503.87	4	6075 Adj	8880	10383.9	
		GPF Advance	6505	0	0	0		0	0	
		BF	2349	600	406.452	4	6001 Adj	2400	2806.45	
		EEFF	3990	125	84.6774	4	6204 Adj	500	584.677	
		RBDC	4004	600	406.452	4	6217 Adj	2400	2806.45	
		Income Tax	3609	0	0	0		0	0	
Total Deduction:				3545	2401.45			14180	16581	
Net Pay:				23279	15770			91616	107386	

(Signature)
District Education Officer
Mohmand Tribal District

Prepared By: _____

Audited/Checked By: _____

Entered / Verified By: _____

Employee Master File Creation Form
(Applicable for both Payroll and GP Fund)

Employee ID (To be assigned by office)

--	--	--	--	--	--	--	--	--	--

01 OFFICE OF THE District Education Officer Mohmand Tribal District

02 FOR THE MONTH OF / 2020

03 DDO Code (Cost Center)

M	G	6	0	1	3
---	---	---	---	---	---

 Description 04 Primary Schools DEO Mohmand

PERSONNEL ACTIONS - INFO TYPE 00

05 Date of Entry (DD/MM/YYYY)

0	2	/	1	2	/	2	0	2	0
---	---	---	---	---	---	---	---	---	---

06 Current Govt N W NWFP (KPK)
 Enter the existing Government reference in this field Enter the existing employee group reference in this field Enter the current BPS Grade in this field

07 Employee group 1 Active Permanent

08 Employee grade (Sub group) 1 2 Primary School Teacher

09 Employee NIC Number 2 1 4 0 2 9 8 9 9 3 3 4 7
 Enter 13 digit NIC no in this field

10 DOB (DD/MM/YYYY) 2 0 / 0 3 / 2 0 0 1
 Enter the date of birth in sequence in this field

11 Date of entry into Govt service (DD/MM/YYYY) 1 1 / 0 7 / 2 0 2 0
 Enter the date of service joining in this field Enter the Employee no in this field

12 Reason for action 0 1 Fresh
 Enter the following reasons in this field:
 Upon fresh appointment
 Upon transfer in/from

PERSONAL DATA - INFO TYPE 0002

13 Title Mr Miss Ms Mrs
 Enter the title in this field

14 Last name K H A N
 Enter the last name in this field

15 First name M A N S O O R
 Enter the first name in this field

16 Father/Husband name T A J M U N I R
 Enter the Father/Husband name in this field

17 District of Domicile Mohmand 18 Marital status Unmarried
 Enter the district code in this field Enter the province code in this field Enter the nationality in this field

19 City of Birth Mohmand 20 Date of Marriage/Since (if applicable) DD/MM/YYYY / /

21 Province of Domicile N W NWFP (KPK) 22 No. of dependents
 Enter the marital status as married/unmarried in this field Enter the date of marriage contract in this field Enter the number of dependents

23 Nationality Pakistani 24 Religion Islam
 Enter the religion code

[Signature]
 District Education Officer
 Mohmand Tribal District

ORGANISATIONAL ASSIGNMENT - INFO TYPE 0001

25 DDO Code (Cost Centre)

M G 6 0 1 3

Primary Schools

Enter the 6 Digit DDO Code in this field

26 DDO Code (Fund Centre)

M G 6 0 1 3

Enter the DDO code as mentioned in COA in this field

27 District (Sub area)

M G Mohmand Ghallanai

28 Contract Government

- AJK Government
- Federal Government
- Punjab Government
- Baluchistan Government
- (KPK) NWFP Government
- Sindh Government

29 Position

- Gazetted
- Non Gazetted

30 Designation

Primary School Teacher

Enter the designation in this field

31 Ministry (Organisational Unit)

6 0 0 0 0 0 0 0 1 Education

Enter the Ministry Code in this field

32 Fund Section

0 0 1 Payroll

Enter the fund section in this field

33 Payroll Section

0 0 1 Payroll

Enter the applicable payroll section in this field

34 Buckle No (if any)

Enter the "Buckle (PATI No)" - If any in this field

PRESENT ADDRESS - INFO TYPE 0006

35 C/O

Village: Malik Wazir Killi, Tehsil Halimzai, District Mohmand

House no / Street

36 Enter the house no in this field Enter the street no in this field

Enter the house no in this field Enter the street no in this field

Enter the house no in this field Enter the street no in this field

37 Postal Code

Enter the postal code in this field

38 City

Enter the name of the city in this field

39 District

Enter the name of the district in this field

40 Province / Region

Enter the contract no in this field.

41 Contact No

Enter the residence type in this field

42 Company Housing

- Yes
 - No
- Enter company housing as yes or no

PERMANENT ADDRESS - INFO TYPE 0006

Permanent address

As above

Permanent address is same as above

Permanent address is different from present address

Enter the permanent address in this field

43 C/O

Village: Malik Wazir Killi, Tehsil Halimzai, District Mohmand

44 House no / Street

Enter the house no in this field Enter the street no in this field

Enter the house no in this field Enter the street no in this field

Enter the house no in this field Enter the street no in this field

45 Postal Code

Enter the postal code in this field

46 City

Enter the name of the city in this field

47 District

Enter the name of the district in this field

48 Province

NWFP (KPK)

Enter the contact phone number in this field

49 Contact No

Enter the owned/rented/parent's/employer's residence in this field

50 Company Housing

- Yes
- No

BASIC PAY - INFO TYPE 0008

51 Pay Scale type: PST
 52 BPS Year (Pay Scale Area): 2017
 53 Grade (Pay Scale Group): BPS-12
 54 Pay Scale Level: Rs.13320/-PM

Fields: Information to be entered here:
 Payscale type: Enter the category of employee in this field
 Payscale area: Enter the BPS year in this field
 Increment earned: Enter the Grade in this field

55 Pays

Wage Type	Description	Amount
0 0 0 1	Basic Pay	13320

Wage Type	Description	Amount

Fields: Information to be entered here:
 Code: Enter the pay code in this field
 Description: Enter the description of type of pay in this field
 Balance: Enter the amount of pay in this field

56 LEAVES - INFO TYPE 2001

Code	Description	Balance

Code	Description	Balance

BANK DETAIL - INFO TYPE 0009

57 Bank Branch (Bank Key)

Enter the bank name in this field

Enter the name of the branch name in this field

58 Postal Code

Enter the postal code of the city where bank is located

59 City

Enter the code of the city where bank is located

60 Bank Account no

Enter the account no of the bank in this field

61 Payment method

Enter the payment method as cash or cheque

GP FUND SUBSCRIPTION - INFO TYPE 0057

62 Wage Type

Enter the wage type in this field

63 GPF Subscription

Enter the GP Subscription number in this field

Enter the GPF balance in this field

GP FUND - INFO TYPE 9202

64 Interest Applied
 Yes No

65 GPF balance

66 GPF Bal date (DD/MM/YYYY)

Enter the relevant GPF balance date in this field

67 Old GP Fund Account Number Fresh Appointment

CREATE DATA SPECIFICATION - INFO TYPE

68 Date appointed as Gazetted Officer (DD/MM/YYYY)

69 Suspension Date

70 Expiry of Adhoc/Contract Date

[Signature]
 District Education Officer
 Mohmand Tribal District

EDUCATION AND QUALIFICATIONS

ACADEMIC EDUCATION

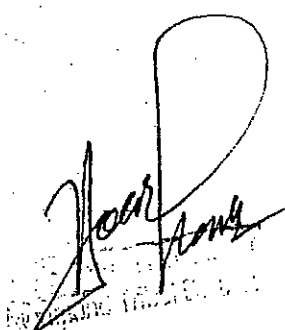
	3(Code)	Type of Institute	4(Code)	Description of Education	5Date Obtained	6Marks/Grade (if any)
1						
2						
3						
4						

PROFESSIONAL QUALIFICATION

	7(Code)	Description of Professional Qualification	8Date Obtained	9Proficiency
1				
2				
3				
4				

Instructions:

- Code of Type of Institute can be found in the 'Book of Codes' together with description.
- Code of Description of Education can be found in the 'Book of Codes' together with description.
- Code of Description of Professional Qualification can be found in the 'Book of Codes' together with description.
- Date Obtained : Date on which this education/qualification was obtained. Use this format DD / MM / YYYY
For example 10 September 1990 will be written as 10/09/1990
- Type of Institute: For example High school, Business school etc
- Description of Education : The description of the education obtained. For example B.A., B-Com, B.Sc
- Marks (if any) : Marks obtained e.g. 80%, 60% etc
- Description of Professional Qualification : For example CA, ACMA, LLB, MBBS etc
- Proficiency: How to rate your professional expertise. For example High, Poor, Excellent etc



A handwritten signature in black ink, appearing to read 'Ravi Kumar', is written over a faint, illegible stamp or text.

00962330 MANSOOR KHAN CNIC: 2140298993347 Desig: PRIMARY SCHOOL TEACH(80949449) Grade: 12 NTN: Buckle No.: Gazetted/Non-Gazetted: N
 PAYMENTS AMOUNT DEDUCTIONS AMOUNT LOAN/FUND PRINCIPAL REPAID BALANCE

0001 Basic Pay	13,320.00	3501 Benevolent Fund	600.00-				
1000 House Rent Allowance	1,961.00	3990 Emp.Edu. Fund KPK	125.00-				
1210 Convey Allowance 20	2,856.00	4004 R. Benefits & Death C	600.00-				
1300 Medical Allowance	1,500.00						
1528 Unattractive Area A	1,700.00						
2211 Adhoc Relief All 201	1,114.00						
2224 Adhoc Relief All 201	1,332.00						
2247 Adhoc Relief All 201	1,332.00						
2264 Adhoc Relief All 201	1,332.00						

Accounts Office GHALANAI
 PAYROLL REGISTER
 For the month of January ,2021

Page : 759
 Date : 27.01.2021

DDO : MG6013 DEO Primary Education Mohmand Payroll Section : 001 Payroll 1

5801 Adj Basic Pay	132,141.00	3012 GPF Subscription	2,220.00-	GPF#:	2,220.00
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PAYMENTS	158,588.00	DEDUCTIONS	3,545.00-	NET PAY	155,043.00	01.01.2021	31.01.2021
Branch Code:		Payment through DDO		Acct.No:			



OFFICE OF THE DISTRICT EDUCATION OFFICER

MOHMAND TRIBAL DISTRICT

Ph. No. : 0924-290180

FAX : 0924290180

Email :- deomohmand@gmail.com



No. _____ Dated _____ / _____ / 2020.

Transfer order

The competent authority is pleased to transfer/Deployed the following PST Teacher to the school noted against his name on his own pay and scale in the interest of public service with immediate effect.

S.No	Name	Desig;	Present posting	Transferred/Deployed to	Remarks
1	Mansoor Ahmad Khan	PST	GPS Selai	GPS Khadi Khel Malik Lal Khan Khweizai	GPS selai non-Functional due to security Reason

Note.

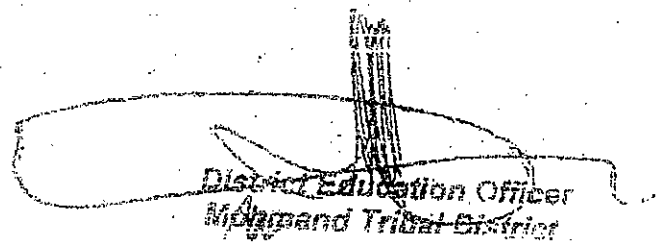
1. Charge report should be submitted to all concerned.
2. TA/DA & Transfer Grant is allowed.

(Jaddi Khan Khalil)
District Education Officer,
Mohmand Tribal District.

Endst No. 231-94 /Dated: 14 /07/2020.

Copy to the:-

1. ADEO concerned.
2. , Official concerned.
3. Office record.


District Education Officer
Mohmand Tribal District



**OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT**

Ph. No. : 0924-290180

FAX : 0924290180

Email :- deomohmand@gmail.com



STUDY LEAVE.

Under the provision of NWFP (Now Khyber Pakhtunkhwa) civil servant revised leave rules 1981, Sanction is hereby accorded to the grant of Study leave for a period with effect from 01/02/2022 to 31/01/2024 (24 months) (both days inclusive) with pay in respect of Mr. Mansoor Ahmad Khan PST GPS Selai Tehsil Baizai Tribal District Mohmand.

2. Necessary entry to this effect should be made in her Service Book.

(NOOR HASSAN KHAN)
District Education Officer,
Mohmand Tribal District.

Endst.No. 453-54 / Estab: II / Leave Cases / dated: 24 / 01 / 2022.

Copy to the:-

4. District Accounts Officer Mohmand Tribal District.
5. Accountant/Pay Clerk in local office.
6. Official concerned.


District Education officer,
Mohmand Tribal District.



Office of the
DISTRICT ACCOUNTS OFFICER
MOHMAND AT GHALLANAI
Ph # 0924-290234-176

No: Pay Roll/DAO/Mohmand/2023-24/248-49

Dated: 02.08.2023.

To

The District Education Officer (Male)
District Mohmand at Ghallanai

SUBJECT: ENQUIRY AGAINST GHOST EMPLOYEES.

With reference to your office letter No: 7/Enquiry dated: 13.06.2023 on the subject noted above (copy attached)

In this regard, the details of payment of pay and allowances made to the officials are as under

Name	P.No	Designation	Payment period From : To	Amount	Mode of payment
Ikram Khan	963038	Chowkidar	07/2021 to 02/2023	482907/-	First two months pay through DDO & then through bank.
Muhammad manzar	960248	Chowkidar	07/2021 to 02/2023	472940/-	1 st pay through DDO & then through bank.
Sardar all	960246	Chowkidar	07/2021 to 02/2023	472940/-	1 st pay through DDO & then through bank.
Naseer Khan	960247	Chowkidar	12/2020 to 03/2023	490060/-	1 st pay through DDO & then through bank.
Mansoor khan	962330	PST	01/2021 to 03/2023	628219/-	First three months pay through DDO & then through bank.

As per SAP record first pay was processed through DDO at that time along with acquaintance roll, furthermore expenditure was also reconciled by the DDO concerned at that time as well. Hence it was the responsibility of the DDO concerned to point out these employees in the notice of the High ups at that time.

Furthermore, as per GFR Vol-I and SR Para 197 to 203. It is the responsibility of DDO to maintain record of Non-gazatted Govt. servants i.e. Service Book etc.

Hence the matter may be dealt with at your own end.

DISTRICT ACCOUNTS OFFICER
MOHMAND AT GHALLANAI

Copy forwarded to the Chairman Enquiry Committee Principal GHSS Ghallanai for information and further necessary action.

DISTRICT ACCOUNTS OFFICER
MOHMAND AT GHALLANAI



OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER
(M) LOWER MOHMAND SUBHAN KHWAR
MOHMAND TRIBAL DISTRICT
Email : - sdeomlowermohmand@gmail.com



To,
The District Accounts Officer,
Mohmand Tribal District

Subject: STOPPAGE OF PAY.

Memo:

Reference to the subject noted above and to state that the following C/iv servants are from duties and drawing their salary in wrong cost Center MG6013 (Primary) SDEO Male Lower Mohmand Tribal District.
Therefore, you are hereby requested to stop the pay of the following C/iv Servants from 01.03.2023, till further order.

S.No	P.NO	NAME	F/NAME	DESIGNATION	CNI NO	Branch Code	Account No	Bank Name
1)	985866	MUHAMMAD ARIF	HASSAN JAN	CHOWK:	1710116781355	1435	4109807761	NBP SHABQADAR
2)	985862	FAZLI HADI	MALANG JAN	CHOWK:	2140252508785	1123	10089112910014	ABL GHALLANAI
3)	985835	IHSAN ULLAH	PATI KHAN	CHOWK:	3740599661603	80153	3003812951	KHYBER BANK GHALLANAI
4)	963038	IKRAM KHAN	AMIR BADSHAH	CHOWK:	2140215503541	80153	153000003383001	KHYBER BANK GHALLANAI
5)	960248	MUHAMMAD MANZAR	BASHIR KHAN	CHOWK:	2140646410337	251123	10074630730010	ABL GHALLANAI
6)	960246	SARDAR ALI	ISMAIL KHAN	CHOWK:	2140281060825	251123	10076372400014	ABL GHALLANAI
7)	960247	NASEER ALI	AZAM KHAN	CHOWK:	2140697016205	241849	1236615831001274	MCB Ghallanai
8)	962330	Mansoor Khan	Taj Munir	PST	2140298993347	251123	0010074075390010	ABL Ghallanai

Sub-Divisional Education Officer,
Male Lower Mohmand Tribal District

Endst.No. 514-21 /dated: 28 /02/2023.

Copy forwarded for information to the:

- 1) District Education officer (M) Mohmand Tribal District.
- 2) Manager of NBP Shabqadar w/r to stop his pay for the month of 02/2023 till further order.
- 3) Manager of BOK & MCB Ghallanai w/r to stop their pay for the month of 02/2023 till further order.
- 4) Manger of ABL Ghallanai w/r to stop their pay for the month of 02/2023 till further order.

Sub-Divisional Education Officer,
Male Lower Mohmand Tribal District



OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT MOHMAND
Email:- deomohmand@gmail.com



OFFICE ORDER

1. Whereas report submitted by the SDEO (M) Lower Mohmand vide his office No.514 dated 28/02/2023 stated that the following persons were getting the salaries from his office MG 6013 but not performing duties at any school under his jurisdiction.
2. And whereas inquiry committee comprising of Mr. Aslam Khan Principal (BS-19) GHSS Ghallan and Mr. s/clerk of this office was constituted vide this office No.8065-69 dated 29/05/2023.
3. And whereas the inquiry committee submitted its report on 21/07/2023.
4. And whereas the inquiry report was remanded to the inquiry committee with the direction to revisit its report as the report was not based on as per TORs vide this office No.8657 dated 22/07/2023.
5. And whereas the inquiry committee again submitted its report to this office on 9/8/2023 with the recommendation that the following mentioned five persons may be disowned due to the reasons that their names have not been reflected in the working papers, minutes, merit & appointment orders in the record of this office.

Now therefore, under the mandatory provisions & powers conferred under sections No 20 & 21 of the General Clauses Act 1897 amended in 1956, the DEO (M) Mohmand, as the Competent Authority is pleased to disown ab initio the appointment orders of the following persons and declare them as bogus liable to be proceeded as per PPC 419 & 420 by the law enforcing agencies in the interest of public service.

S.No	Personal No.	Name & Designation	Father's Name
1 ✓	963038	Ikram Khan Chowkidar	Amir Badshah
2 ✓	960248	Muhammad Manzar Chowkidar ✓	Bashir Khan
3 ✓	960246	Sardar Ali Chowkidar ✓	Ismail Khan
4 ✓	960247	Naseer Ali Chowkidar ✓	Azam Khan
5 ✓	962330	Mansoor Khan PST	Taj Munir

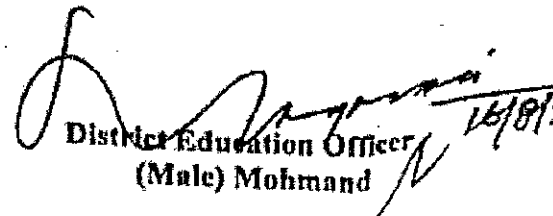
(LIAQAT ALI)
District Education Officer
(Male) Mohmand

Endst No 8824-31 / Estab (Pry)

Dated 16/8/2023

Copy forwarded to the:

- 1) PS to Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
- 2) Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 3) Accountant General Khyber Pakhtunkhwa, Peshawar with the request to inquire the matter that who & why their salaries were started in DAO Mohmand office.
- 4) Deputy Commissioner Mohmand.
- 5) District Accounts Officer Mohmand.
- 6) DMO Education Monitoring Authority Mohmand.
- 7) SDEO concerned, being DDO for recovery of the total amount drawn illegally & deposit the same into the Govt. Exchequer as per rules & with the direction to send this order to the above disown persons.
- 8) Office Copy.


District Education Officer
(Male) Mohmand
16/8/23

To

The Director (E&SE) Department,
Khyber Pakhtunkhwa,
Peshawar.

Subject:

**DEPARTMENTAL APPEAL AGAINST THE IMPUGNED
ORDER DATED 16.08.2023 WHEREBY THE APPOINTMENT
ORDER OF THE APPELLANT HAS BEEN DISOWN BY THE
DISTRICT EDUCATION OFFICER.**

Respected Sir,

It is most humbly stated that the appellant was initially appointed as PST bps-12 vide order dated 11.07.2020 after proper approval of the Departmental Selection Committee and initially posted at GPS Selai District Mohmand and where after due to the no-functional of the said school the appellant was transferred/deployed to GPS Kadi Khil vide order dated 14/07.2023, submit his charge report and started performing his duties at concerned school to the entire satisfaction of his high ups. After gone through all legal and codal formalities the salaries of the appellant were also released.

(Copy of the appointment order is attached.)

That after appointment till date the appellant performing his duties with zeal and zest and no complaint what so ever made against the appellant.

That during his service the appellant applied for study leave and the competent authority vide order dated 24.01.2022 grant study leave to appellant with effect from 01.02.2022 to 31.01.2024.

(Copy of the order attached)

That the appellant on study leave while the department initiated a baseless inquiry against the appellant and on the recommendation of the sad inquiry the impugned order dated 16.08.2023 was issued whereby astonishingly the appointment order of the appellant was disowned. Copy of the impugned order is attached.

That the appellant has not been heard in person and opportunity for justification and clarification of his position has not been provided to the appellant, hence condemned unheard thus violated Article-10A of the constitution of Islamic republic of Pakistan, 1973.

No- 2118

Dated - 23-08-23

That no conclusive proof in that respect is available with the inquiry officers and neither an opportunity provided to the appellant against that person, whose statement were recovered.

That no show cause nor statement of allegation were issued before issuing the impugned order.

That no regular inquiry has been conducted and harsh punishment was awarded against the appellant.

That the impugned order dated 16.08.2023 is again illegal and void as the procedure provided by the Khyber Pakhtunkhwa (E&D) Rules, 2011 has not been followed.

It is, therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 16.08.2023 may very kindly be set aside and the appellant may kindly be re-instated into service with all back benefits.

Dated: 23/8/2023



APPELLANT

Mr. Mansoor Ahmad Khan, Ex-PST bps-12,
GPS Khadi Khel (On Study Leave), District
Mohmand.

بعدالت لہاب 3

مقامی اور بیرونی امور

2ء پنجاب
بنام

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام کے اصرار کے لیے عارضی طور پر ایڈووکیٹ ہائی کورٹ
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری کی طرف یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور 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 بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب 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 نکالت نامہ لکھ دیا کہ سند ہے۔

سید احمد علی

20ء

ماہ

الرقوم

العبد گداہ العبد

کے لئے منظور ہے۔

مقامی اور بیرونی امور

Handwritten signature and text.