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

CM No. /2023

IN

Service Appeal No.2213/2023

Mr. Abdul Majeed,

.....**APPELLANT**

VERSUS

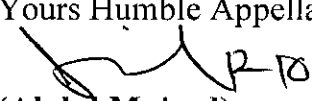
Government of Khyber Pakhtunkhwa through Chief Secretary KPK,
Peshawar and Others

.....**RESPONDENTS**


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Yours Humble Appellant


(Abdul Majeed) 12101-0569991-5
Through Counsel

Dated: 01/01/2023


Khalid Mahmood
Advocate High Court
Stationed at D.I.Khan

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

①

CM No. /2023

Khyber Pakhtunkhwa
Service Tribunal

IN

Diary No. 10226

Service Appeal No.2213/2023

Dated 3-1-2024

Mr. Abdul Majeed,

.....APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary KPK,
Peshawar and Others

.....RESPONDENTS

**CM FOR PLACING OF DOCUMENTS IN RESPECT OF
ORDER DATED 20.12.2023 OF HONORABLE TRIBUNAL IN
ABOVE TITLED APPEAL 02.06.2023**

Respectfully Sheweth,

Appellant through counsel humbly submits as under.

1. That above titled appeal is pending and fixed before Honorable Tribunal on 03.01.2024.
2. That some backup report are necessary for fat of decision of above titled appeal i.e
 - i. Order No.3878, dated 05.07.2019 as Naib Tehsildar Paharpur on ops for three months. - **A**
 - ii. Order No.5871 dated 27.09.2019 as Naib Tehsildar Darazinda on ops for one month and fifteen days. - **B**
 - iii. Order No.75, dated 12.11.2019 as Naib Tehsildar Consolidation DIKhan on ops for four months & eighteen days. **C**
 - iv. Order dated 27.03.2020, as Naib Tehsildar Paharpur for 18 months & 13 days. - **D**
 - v. Order No.1439 dated 10.03.2022 as Naib Tehsildar Jandola for-03 months & 02 days. **E**
 - vi. Order No.4114, dated 28.06.2022 as Naib Tehsildar (Regular) for 04 months & 13 days. - **F**
 - vii. Order No.5633-65 dated 11.11.2022 as Tehsildar settlement Paniyal ops for 9 months. - **G**

It is therefore, requested that above CM may be accepted.

Dated: 01/01/2024

Appellant

Through Counsel

Khalid Mahmood

Advocate High Court
Stationed at D.I.Khan

(2)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

CM No. /2023

IN

Service Appeal No.2213/2023

Mr. Abdul Majeed,

.....APPELLANT

VERSUS

**Government of Khyber Pakhtunkhwa through Chief Secretary KPK,
Peshawar and Others**

.....RESPONDENTS

AFFIDAVIT

I, Mr. Abdul Majeed, Appellant hereby solemnly affirm and declare on oath that all the contents of this CM are true and correct to the best of my knowledge and nothing has been concealed deliberately from this Honorable Tribunal.

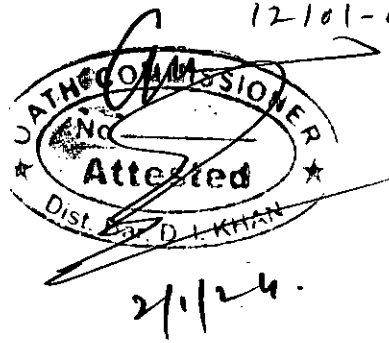


Identified by Counsel
KHALID MAHMOOD
Advocate High Court
Stationed at D.I.Khan



Deponent

12101-0569991-5





OFFICE OF THE
COMMISSIONER
D I KHAN DIVISION D I KHAN



(A)

☎ 0900-8103381 ☎ 0900-8103381 ☎ 0900-8103381
☎ 0900-8103381 ☎ 0900-8103381 ☎ 0900-8103381

No. 3878 /Extt:

Dated DIKhan the 05 /07/2019

(3)

OFFICE ORDER:-

Mr. Abdul Majeed Kanungo r/o Yarik is hereby transferred and posted as a Naib Tehsildar Paharpur against the vacant post in his own pay and scale with immediate effect till further orders in the best interest of public.

Sd
Commissioner
DIKhan Division, DIKhan


ML

Dated the DIKhan 05 /7/2019

Commissioner DIKhan
Secretary (Establishment) Board of Revenue, Revenue & Estate
Government of Khyber Pakhtunkhwa, Peshawar.

Commissioner DIKhan Division, DIKhan
for compliance.

ATTESTED


KHALID MEHMOOD
Advocate High Court
Stationed at D.I.Khan

SD/9/2019

(B) (4)

No. 5871 /Estt: Dated DIKhan the 27/9 /2019.**Office order:**

Following posting transfer amongst the Tehsildar and Naib Tehsildars are hereby ordered in the best interest of public service with immediate effect:-

S.No.	Name of Tehsildar/Naib Tehsildar	From	To	Remarks.
1.	Mr. Hakim Khan (Naib Tehsildar)	Waiting for posting	Settlement Tehsildar DIKhan in his own pay & scale.	Against the vacant post
2.	Mr. Muhammad Ijaz (NT OPS)	PNT (M) Jandola SWTD	Reader to Commissioner, DIKhan Division, DIKhan.	Vice No.3
3.	Mr. Amir Muhammad (NT ACB)	Reader to Commissioner, DIKhan Division, DIKhan	PNT Jandola TSD Tank	Vice No.5
4.	Mr. Abdul Majeed Kanungo	NT Paharpur	PNT Darazinda TSD DIKhan, in his own pay & scale.	Against the vacant post
5.	Muhammad Waris Political Moharrir TSD Jandola Tank.	PNT Jandola TSD Tank	PNT Dhana Warraspoon TSD Tank in his own pay & scale	Against the vacant post.
6.	Sheikh Fazal Rehman Kanungo	Kanungo consolidation DIKhan	NT Paharpur in his own pay & scale	Vice No.4

Sd/-

Commissioner,
DIKhan Division, DIKhan.No. 5872-79 /Estt:

Copy to the:-

1. Deputy Commissioner, DIKhan.
2. Deputy Commissioner, Tank.
3. Deputy Commissioner, SWTD.
4. District Accounts Officers, DIKhan, Tank & SWTD.
5. Assistant to Commissioner (Rev), DIKhan Division, DIKhan.
6. Assistant Secretary (Estt) Board of Revenue Khyber Pakhtunkhwa Peshawar.
7. PS to Commissioner, DIKhan Division, DIKhan.
8. Officials concerned for compliance.

KHALID MEHMOOD
Advocate High Court
Stationed at D.I.Khan



COMMISSIONER
DIKHAH DIVISION DIKHAH



C
S

No. _____ (ESST) Dated: _____ D.I.Khan the _____ /2019

OFFICE ORDER:

In pursuance of Chief Minister's Secretariat Khyber Pakhtunkhwa letter No. DS-IPC/CMS-5-1/2019/9765-88 dated 2.10.2019 Annex-A (i) and Board of Revenue Order No. EX-1/Anti-Corruption Measures/2019/11229-60 dated 23.10.2019, the following Postings / Transfers amongst the Tehsildars/Naib Tehsildars and Revenue staff of this Division is hereby ordered with immediate effect in the best interest of public services:-

S. No.	Name	From	To
1	Mr. Baranullah Tehsildar	Tehsildar D.I.Khan	Tehsildar Peshawar
2	Mr. Saadullah Tehsildar	Special Tehsildar Irigation D.I.Khan	Tehsildar D.I.Khan
3	Sajid Saqem Naib Tehsildar	Tehsildar Peshawar (OPS)	Naib Tehsildar Patuwa
4	Mr. Haq Nawaz Naib Tehsildar	Naib Tehsildar Consolidation D.I.Khan	Special Tehsildar Irigation Rod Kohl D.I.Khan (OPS)
5	Mr. Muhammad Aslam (Khan)	Naib Tehsildar Patuwa (OPS)	Naib Tehsildar Darazinda (OPS)
6	Mr. Anwar Khan	Naib Tehsildar Darazinda (OPS)	Naib Tehsildar Consolidation D.I.Khan (OPS)

Sd/-
Commissioner,
Dikhan Division, Dikhan.

No. _____ Dated: _____ D.I.Khan the _____ /2019

Copy to

- Principal Secretary to Chief Minister Khyber Pakhtunkhwa Peshawar for information with reference to above.
- Deputy Commissioner, Dikhan
- Deputy Commissioner, Peshawar
- Deputy Commissioner, SGTD
- Assistant Secretary (ESST) Board of Revenue Khyber Pakhtunkhwa Peshawar
- PS to Commissioner, Dikhan Division, Dikhan
- Officers concerned for compliance.

Secretary to Commissioner
Dikhan Division, Dikhan

RECEIVED
SECRETARY TO COMMISSIONER
DIKHAH DIVISION
DIKHAH

Handwritten signature/initials

Better Copy
COMMISSIONER

DIKHAN DIVISION DIKHAN

No _____ P (Esst) _____ Dated _____ D.I.Khan the 12th/ 11/ 2019

OFFICE ORDER

In pursuance of Chief Minister's Secretariat Khyber Pakhtunkhwa letter No. DS-IPC/CMS/ 5-1/2019/9765-88 dated 2.10.2019 Annex-A (i) and Board of Revenue letter No. Estt/Anti-Corruption Measures/2019/34229-60 dated 23.10.2019, the following posting / transfer amongst the Tehsildars/Naib Tehsildars and Revenue Field Staff of this Division is hereby ordered with immediate effect in the best interest of public service:-

S.No.	Name	From	To
1.	Mr. Ikramullah Tehsildar	Tehsildar DIKHAN	Tehsildar Paharpur
2.	Mr. Sherbahadar Tehsildar	Special Tehsildar Irrigation Rod Kohi DIKHAN	Tehsildar DIKHAN
3.	Sajid Saleem Naib Tehsildar	Tehsildar Paharpur (OPS)	Naib Tehsildar Prova
4.	Mr. Haq Nawaz Naib Tehsildar	Naib Tehsildar Consolidation DIKHAN	Special Tehsildar Irrigation Rod Kohi DIKHAN (OPS)
5.	Mr. Muhammad Aslam (Kanungo)	Naib Tehsildar Prova (OPS)	Naib Tehsildar Darazinda (OPS)
6.	Mr. Abdul Majeed Kanungo	Naib Tehsildar Darazinda (OPS)	Naib Tehsildar Consolidation DIKHAN (OPS)

Sd/-
Commissioner,
DIKHAN Division, DIKHAN

No. _____ Dated _____ the DIKHAN 12-11-2019

Copy to:

1. Principal Secretary To Chief Minister Khyber Pkhtunkhwa Peshawar for information and reference above:
2. Deputy Commissioner D.I.Khan
3. Deputy Commissioner Tank
4. Deputy Commissioner SWTD
5. Assistant Secretary (Estt) Board of Revenue Khyber Pakhtunhwa Peshawar.
6. PS to Commissioner DIKHAN Division DI KHAN
7. Officer Concerned for compliance
8. Officer Order file.

Secretary to Commissioner
D.I.Khan Division D.I.Khan



GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT
Peshawar dated the 27/08/2020

36

D

O.R.D.E.R

No.Estt:V/DPC/NT/2020/_____ On the recommendation of Departmental Promotion Committee meeting dated 20.08.2020, the Competent Authority is pleased to order the appointment of the following Kanungos (BS-11) of Peshawar, Hazara and Dikhan Division to the post of Naib Tehsildar (BS - 14) on acting charge basis with immediate effect:-

S. No.	NAME OF OFFICIAL	OFFICES
1.	Mr. Zar Ali	Kanungo of District Nowshera
2.	Mr. Abdul Khaliq	Kanungo of District Haripur
3.	Mr. Muhammad Akhtar	Kanungo of District Haripur
4.	Mr. Hussain Ali	Kanungo of District Kohistan Upper
5.	Mr. Muhammad Hassan	Kanungo of District Dikhan
6.	Mr. Abdul Majeed	Kanungo of District Dikhan

Consequent upon their appointment as Naib Tehsildar on acting charge basis, the following posting / transfer is hereby ordered with immediate effect:-

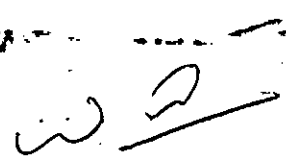
S.NO.	NAME OF OFFICIAL	FROM	TO
1.	Mr. Zar Ali	District Kanungo (OPS) Nowshera.	Retained on the same post and station
2.	Mr. Abdul Khaliq	Naib Tehsildar (OPS) Khanpur.	Retained on the same post and station.
3.	Mr. Muhammad Akhtar	Naib Tehsildar (OPS) Lora.	Retained on the same post and station.
4.	Mr. Hussain Ali	Naib Tehsildar (OPS) Dassu Hydro Power Project.	Retained on the same post and station
5.	Mr. Muhammad Hassan	Naib Tehsildar (OPS) Settlement Dikhan.	Retained on the same post and station
6.	Mr. Abdul Majeed	Naib Tehsildar (OPS) Pahari.	Retained on the same post and station

By order of
Senior Member

No.Estt:V/DPC/NT/2020/ 21919-32.

Copy forwarded to the:-

1. Commissioners, Peshawar, Hazara and Dikhan Division.
2. Deputy Commissioners of the respective Districts.
3. District Accounts Officers of the respective Districts
4. Senior Member Board of Revenue


KHALID MEHMOOD
Advocate High Court
Stationed at D.I.Khan



OFFICE OF THE
COMMISSIONER
DIKHAN DIVISION DIKHAN



(B) (7)

0996 9280151
092 966 9280152
092 111 9921960
@commissionerdikhan
@commissionerdikhan
commissionerdikhan@pshs.gov

No. 1439 /Estt:

Dated DIKhan the 16-03 /2022.

OFFICE ORDER

The Competent authority (Commissioner DIKhan Division, DIKhan) has been please to issue the following posting/transfer amongst the Nalb Tehsildars working in DIKhan Division with immediate effect in the best interest of public service.

S.No.	Name of official	From	To	Remarks
1.	Mr. Muhammad Aslam Kanungo (NT OPS)	NT Parova	NT Paharpur	Vice No.4
2.	Sheikh Fazal Rehman Kanungo (NT OPS)	NT Rod Kohi DIKhan	NT Parova	Vice No.1
3.	Mr. Attaur Rehman NT (ACB)	NT Jandola TSD Tank	NT Rod Kohi DIKhan	Vice No.2
4.	Mr. Abdul Majeed NT (ACB)	NT Paharpur	NT Jandola TSD Tank..	Vice No.3

Sd/-
Commissioner,
DIKhan Division, DIKhan.

No. 1460-43 /Estt:

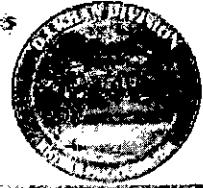
Copy to the :-

1. Deputy Commissioner, DIKhan.
2. Deputy Commissioner, Tank.
3. District Accounts Officer, DIKhan, Tank.
4. Officials concerned for compliance.
5. Office order file.

Secretary to Commissioner,
DIKhan Division, DIKhan.

ATTESTED

KHALID MEHMOOD
Advocate High Court
Station-1 of DIKhan



F 8

4114 /Estt:

Dated D.I.Khan the 28/6/2022 ✓

OFFICE ORDER:

Following posting/Transfer amongst the Tehsildar/Naib Tehsildars is hereby ordered with immediate effect in the best public interest.

S.No.	Name of Officer	From	To	Remarks
1	Ihsanullah Tehsildar	Waiting for posting	Tehsildar Sarwakai SWTD	Against the newly created post of Tehsildar.
2	Abdul Majeed Naib Tehsildar (ACB)	Naib Tehsildar (Jandola) Tribal Sub Division Jandola Tank	Naib Tehsildar Paharpur	Vice No.11
3	Muhammad Ishaq Naib Tehsildar (ACB)	Waiting for posting	Naib Tehsildar Jandola TSD Jandola Tank.	Vice No.2
4	Fakhar ud Din Naib Tehsildar (ACB)	-do-	Naib Tehsildar Consolidation DIKhan	Against the vacant post
5	Syed Ulfat Raza Naib Tehsildar (ACB)	-do-	Reader to Commissioner, DIKhan Division, DIKhan	-do-
6	Naseer Ahmad Naib Tehsildar (ACB)	-do-	District Qanungo, Dera Ismail Khan	Vice No.7
7	Ihsanullah	District Qanungo, Dera Ismail Khan	Naib Tehsildar Tank	Vice No.8
8	Umar Farooq Shah-Naib Tehsildar	Naib Tehsildar Tank.	Tehsildar Tank in Own Pay & Scale, fill further order.	Against the Vacant post
9	Imtiaz Ahmad Naib Tehsildar (ACB)	Waiting for posting	Naib Tehsildar Toikhullah SWTD	Vice No.13
10	Muhammad Aslam Naib Tehsildar (ACB)	Naib Tehsildar Paharpur	Naib Tehsildar Paroa	Vice No.11
11	Sheikh Fazal Rehman	Naib Tehsildar Paroa	Naib Tehsildar Daraban	Vice No. 12
12	Anjad Naeem	Naib Tehsildar Daraban	Naib Tehsildar Dhanna Wamspoon TSD Jandola, Tank	Against the vacant post
13	Muhammad Jamil Senior Clerk	Naib Tehsildar Toikhullah SWTD in his own pay & scale	Repatriated to his original post in DC office SWTD.	
14	Muhammad Saqlain JC/PM	NT Ladha SWTD (OPS)	Naib Tehsildar Mahsood Tank SWTD(OPS)	Against vacant post (On completion of two years tenure)
15	Amir Muhammad Naib Tehsildar (ACB)	NT Sarwakai (SLCP survey)	Naib Tehsildar Sararogha SWTD	Against vacant post (On completion of two years tenure)

ATTESTED

KHALID MEHMOOD
Advocate High Court
Stationed at D.I.Khan



OFFICE OF THE
COMMISSIONER

DIKHAN DIVISION DIKHAN

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(9) (9)

No. 5633-65/Estt:

Dated DIKhan the 11/11 /2022

OFFICE ORDER:

Following posting/Transfer amongst the Tehsildars/Naib Tehsildars DIKhan Division DIKhan is hereby ordered with immediate effect in the best public interest :-

S.No.	Name of officer	From	To	Remarks.
1	Sajid Saleem Tehsildar (ACB)	Tehsildar Paharpur	Tehsildar DIKhan	Vice No.2(On Completion of 2 years tenure)
2	Muhammad Iftikhar Tehsildar (ACB)	Tehsildar DIKhan	Stamp Inspector Commissioner office DIKhan	Against Vacant Post
3	Tufail Muhammad Tehsildar (ACB)	Waiting for posting	Tehsildar Service Delivery Center DIKhan	Against Vacant Post
4	Ihsanullah Naib Tehsildar (Regular)	Naib Tehsildar Tank	Tehsildar Paharpur (OPS)	Vice No.1
5	Amanullah Naib Tehsildar (ACB)	Waiting for posting	DK DIKhan	Vice No.7
6	Muhammad Shahid Naib Tehsildar (ACB)	Waiting for posting	Naib Tehsildar Irrigation Tank	Vice No.13
7	Naseer Ahmad Naib Tehsildar (ACB)	DK DIKhan	Naib Tehsildar Daraban	Vice No.8
8	Sheikh Fazal Rehman Naib Tehsildar (ACB)	Naib Tehsildar Daraban	Settlement Naib Tehsildar Paniala DIKhan	Vice No.9
9	Abdul Qadeem Naib Tehsildar (Regular)	Settlement Naib Tehsildar Paniala DIKhan	Naib Tehsildar Sarwakai SWTD	Against Vacant Post
10	Abdul Majeed Naib Tehsildar (Regular)	Naib Tehsildar Paharpur	Settlement Tehsildar (OPS)	Against Vacant post
11	Muhammad Saqlain Naib Tehsildar (OPS)	Naib Tehsildar (Mehsud) Tank	Naib Tehsildar Paharpur (OPS)	Vice No.10
12	Muhammad Amin Naib Tehsildar (Regular)	Naib Tehsildar Land Acquisition Tank.	Naib Tehsildar Tank	Vice No.4
13	Akhtar Munir Naib Tehsildar (ACB)	Naib Tehsildar Irrigation Tank.	Naib Tehsildar Land Acquisition Tank.	Vice No.12 (on completion of 2 years tenure)
14	Abdul Saeed Naib Tehsildar (Regular)	DK Tank	Naib Tehsildar Dhanna Warnspoon TSD Jandola Tank	Vice No.17
15	Muhammad Imtiaz Naib Tehsildar (ACB)	NT Toki Khullah SWTD	DK Tank	Vice No.14

KHALID MEHMOOD
Advocate High Court
Stationed at D.I.Khan

16	Haibat Khan Naib Tehsildar (ACB)	Naib Tehsildar Mahsood (J) SWTD	Naib Tehsildar Toikhullah SWTD	Vice No.15 (on completion of 2 years tenure)
17	Amjad Naeem Naib Tehsildar (OPS)	Naib Tehsildar Dhanna Warnspoon TSD Jandola Tank	Naib Tehsildar Irrigation Parova (DIKhan)	Vice No.18
18	Muhammad Akram Naib Tehsildar (Regular)	Naib Tehsildar Irrigation Parova (DIKhan)	Tehsildar Tank (OPS)	Vice No.19
19	Umar Farooq Naib Tehsildar (Regular)	Tehsildar Tank (OPS)	Naib Tehsildar Ladha SWTD	Against vacant post.
20	Ijaz Khan Naib Tehsildar (OPS)	Naib Tehsildar Shawal SWTD	Naib Tehsildar Darazinda (OPS)	Vice No.21
21	Muhammad Haroon Naib Tehsildar (Regular)	Naib Tehsildar Darazinda	Naib Tehsildar Shawal SWTD	Vice No.20

10

Sd/-
Commissioner
DIKhan Division, DIKhan

No. 5633-65/Estt: Dated: 11/11/2022

Copy to the :-

1. Deputy Commissioners, DIKhan, Tank & SWTD.
2. Secretary to Commissioner DIKhan Division
3. Assistant Secretary (Estt), Board of Revenue Govt: of Khyber Pakhtunkhwa Peshawar.
4. District Accounts Officers, DIKhan, Tank & SWTD.
5. PS to Commissioner DIKhan Division
6. Officers concerned for compliance.

[Handwritten signature]

[Handwritten signature]
Assistant to Commissioner (Rev & GA)
DIKhan Division, DIKhan