

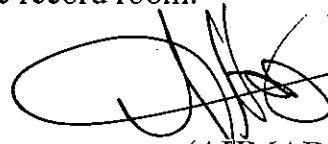
30.08.2018

Counsel for the appellant and Mr. Riaz Ahmad Painsakhel,
Assistant Advocate General for the respondents present. Arguments
heard and record perused.

Vide our detailed judgment of today placed in connected
Service Appeal No. 428/2016 "titled Muhammad Bilal Versus The
Director General Agriculture Extension, Khyber Pakhtunkhwa,
Peshawar and another", the appeal is accepted and the respondents are
directed to provide opportunity of showing ^{Cause/Notice in} case/hearing to the
appellant and thereafter pass orders as deemed appropriate. No order
as to cost. File be consigned to the record room.

ANNOUNCED

30.08.2018



(AHMAD HASSAN)
MEMBER



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

10.04.2018

Junior to counsel for the appellant, Mr. Usman Ghani, District Attorney for the respondents present. Seeks adjournment as senior counsel for the appellant is not in attendance. To come up for arguments before the larger bench on 21.06.2018.

(M. Hamid Mughal)
Member

Chairman

(M. Amin Khan Kundi)
Member

21.06.2018

(Ahmad Hassan) appellant and Addl: AG for respondents present. Adjourned. To come up for arguments before larger bench on 09.07.2018 before D.B.

(Ahmad Hassan)
Member

(M. Amin Khan Kundi)
Member

09.07.2018

Learned counsel for the appellant and Mr. Zia Ullah, learned Deputy District Attorney present. To come up alongwith connected appeal No.427/2016 on 30.08.2018 before D.B

(Ahmad Hassan)
Member
(Muhammad Hamid Mughal)
Member

(Muhammad Amin Kundi)
Member

12.01.2018

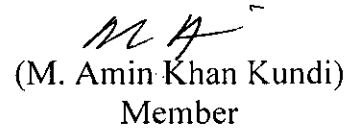
Appellant in person and Mr. Usman Ghani, District Attorney for the respondents present. Due to general strike of the bar, counsel for the appellant is not in attendance. To come up for arguments on 01.03.2018 before the full bench.



(M. Hamid Mughal)
Member



Chairman



(M. Amin Khan Kundi)
Member



(Ahmad Hassan)
Member



(Gul Zeb Khan)

01.03.2018

Clerk of counsel for the appellant, and Mr. Muhammad Jan, DDA present and submitted before the court that the case has been prepared by the learned District Attorney who is not present today. Requested for adjournment. To come up for arguments on 10.4.2018 before the full bench.



(M. Hamid Mughal)
Member



Chairman



(M. Amin Khan Kundi)
Member



(Ahmad Hassan)
Member




(Gul Zeb Khan)
Member

12.1.2018

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney alongwith Basir Ahmad, Agriculture Officer for the respondents present. After the arguments at some length, this Tribunal reaches the conclusion that in similar cases entitled "*Kashifullah Vs. Government of Khyber Pakhtunkhwa and others*" bearing No. 136/2016 decided on 29.2.2017, the bench comprising of Chairman and Mr. Ahmad Hassan, Member granted the relief to the appellant, whereas one member of this bench (Mr. Gul Zeb Khan, Member) apprised the Tribunal that similar cases were decided at camp court D.I.Khan, by M/S Muhammad Hamid Mughal learned Judicial Member and Gul Zaib Khan, Member and decision in those appeals were contrary to the one mentioned above. This Tribunal therefore, deems it appropriate to fix the present appeal before the larger bench for arguments on 06.02.2018. The relevant cases of camp court D.I.Khan be also requisitioned for the date fixed.

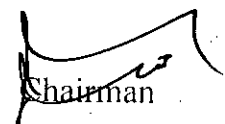

Member


Chairman

06.02.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Baseer Ahmad, Agriculture Officer for the respondents present. Arguments could not be heard due to shortage of time. To come up for arguments on 12.2.2018 before the Larger Bench.


(M. Hamid Mughal)
Member


Chairman



(M. Amin Khan Kundi)
Member



(Ahmad Hassan)
Member


(Gul Zeb Khan)
Member

13. 24.07.2017

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondent present. Counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 27.09.2017 before D.B.



(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

27.09.2017

Clerk to counsel for the appellant and Asst: AG alongwith Mr. Basir Muhammad , Agriculture Officer for the respondents present. Clerk to counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 23.11.2017 before D.B.


Member


Chairman

23.11.2017

Counsel for the appellant present. Mr. Zia Ullah, Deputy District Attorney alongwith Mr. Basir Ahmad Agriculture Officer, for the respondents present. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 12.01.2018 before D.B.


(Gul Zeb Khan)
MEMBER


(MUHAMMAD HAMID MUGHAL)
MEMBER

25.04.2017

Counsel for the appellant and Addl. AG for the respondents present. Learned counsel for the appellant submitted amended appeal which is placed on file. No one present on behalf of respondents. Notice shall be issued to the respondents. To come up for written reply on amended appeal on 15.05.2017 before S.B.


(Ahmad Hassan)
Member

15.05.2017

Clerk to counsel for the appellant and Mr. Bashir Ahmad, Agriculture Officer alongwith Addl. AG for the respondents present. Representative of the respondent-department requested for adjournment. Request accepted. To come up for written reply on amended appeal on 19.06.2017 before S.B.


(Ahmad Hassan)
Member

19.06.2017

Appellant in person present. Mr. Baseer Ahmed, Agriculture Officer alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Representative of respondent-department submitted para-wise comments on amended appeal. To come up for rejoinder and arguments on 24.07.2017 before D.B.


(Muhammad Amin Khan Kundi)
Member

28.07.2016

Appellant in person and Addl. AG for the respondents present. Written reply submitted. The appeal is assigned to D.B. for rejoinder and final hearing for 23.11.2016.


Chairman

23.11.2016


Counsel for the appellant and Additional AG for respondents present. Learned counsel for the appellant submitted an application for amendment in the instant appeal. Notice of the said application be issued to the respondents for reply/arguments on application. To come up for reply/arguments on application on 24.3.17.


(ABDUL LATIF)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

24.03.2017

Counsel for the appellant and Assistant A.G. alongwith Basir Muhammad, Agriculture Officer for the respondents present. Learned Asstt. AG requested for adjournment. To come up for reply and arguments on application for amendment in the appeal on 25.04.2017 before S.B.


Chairman

~~Order for the appeal and will be for the respondent
present to the appellant
counsel for the appellant
notice to the respondent
No one is to appear
of respondents. Notice shall be issued to all respondents
on 05.05.2018
before S.B.~~

~~(Signature)
(Signature)
(Signature)
(Signature)~~

~~(Signature)
(Signature)
(Signature)~~

27.05.2016

Counsel for the appellant present and submitted an application for early hearing. Application is allowed. To come up for preliminary hearing on 02.6.2016 before S.B instead of 15.07.2016.


Chairman

2.06.2016

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was appointed as civil servant and was performing his duty as Field Worker. Vide impugned order dated 31.12.2015 when his services were terminated on the allegations of illegal appointment where-against he preferred departmental appeal on 12.1.2016 which was not responded and hence the instant service appeal on 21.4.2016.

That the appellant was a regular civil servant and that the prescribed procedure of enquiry and affording opportunity of hearing was not afforded to him.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 28.07.2016 before S.B. Notice of stay application shall also be issued to the respondents for the date fixed. Any appointment against the subject post shall be subject to final decision of this Tribunal.



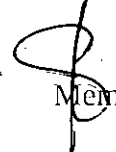


Chairman

Appellant Deposited
Security & Process Fee

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 429/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	21.04.2016	<p>The appeal of Mr. Ramdad Khan presented today by Mr. Khaled Rehman Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	27-4-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>5-5-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	5.5.2016	<p>Counsel for the appellant present. Requested for adjournment. Adjourned for preliminary hearing to 10.5.2016 before S.B.</p> <p style="text-align: right;"> Member</p>
	10.05.2016	<p>Agent of counsel for the appellant present and requested for adjournment as counsel for the appellant is not in attendance today. Adjourned for preliminary hearing to 15.07.2016 before S.B</p> <p style="text-align: right;"> Member</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 429 /2016

Ramdad Khan..... Appellant

Versus

The DG Agriculture and others.....Respondents

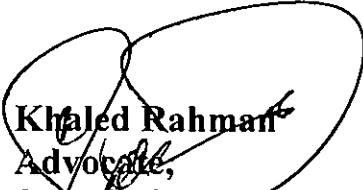
INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal			1-3
2.	Appointment order	03.05.2013	A	0-4
3.	Employment Registration Card		B	0-5
4.	Arrival Report	03.05.2013	C	0-6
5.	Extracts from Service Book		D	7-10
6.	Complaint by Aftab Ali		E	0-11
7.	Renunciation letter	15.07.2015	F	0-12
8.	Inquiry Report	31.07.2015	G	13-14
9.	Impugned office order	31.12.2015	H	0-15
10.	Departmental appeal		I	16-17
11.	Wakalat Nama			



Appellant

Through


Khaled Rahman
Advocate,
Supreme Court of Pakistan
3-D, Haroon Mansion
Khyber Bazar, Peshawar
Off: Tel: 091-2592458
Cell # 0345-9337312

Dated: ___/04/2016

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 429 /2016

Mr. Ramdad Khan

Ex-Field Worker,

Office of the District Director

Agriculture Extension, Nowshera.....Appellant

Versus

1. **The Director General**
Agriculture Extension,
Khyber Pakhtunkhwa, Peshawar

~~G.W.F. Province~~
~~Service Tribunal~~

Diary No. 400

Dated 21-4-2016

2. **The District Director**
Agriculture Extension, Nowshera Respondents

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 31.12.2015 PASSED BY RESPONDENT NO.2 WHEREBY THE SERVICES OF THE APPELLANT WERE TERMINATED AGAINST WHICH HE PREFERRED A DEPARTMENTAL APPEAL TO RESPONDENT NO.1 BUT THE SAME WAS NOT DISPOSED OF WITHIN THE STATUTORY PERIOD OF 90 DAYS.

PRAYER:

On acceptance of the instant appeal, the impugned office order dated 31.12.2015 may graciously be set aside and appellant be reinstated into service with all back benefits.

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. **That** appellant was appointed by Respondent No.1 as Field Worker (BPS-1) vide office order dated 03.05.2013 (*Annex;-A*) after observing all the codal formalities pursuant to the registration of the appellant with Employment Exchange, Nowshera vide Employment Registration Card (*Annex;-B*). On appointment,

~~Filed in case~~
~~Registered~~
21/4/16

appellant submitted his arrival report (*Annex;-C*) in the office of Respondent No.1 on the same date.

2. **That** since his appointment, appellant regularly performed his duties in the Department to the entire satisfaction of the high-ups and moreover the Department has also prepared proper Service Book (*Annex;-D*) in respect of the appellant wherein all the entries were entered from time to time and appellant received salaries from the Department.
3. **That** on the so called complaint (*Annex;-E*) allegedly filed by one Aftab Ali before the Secretary Agriculture which was specifically denied by him vide his renunciation letter dated 15.07.2015 (*Annex;-F*) an inquiry was conducted through District Director through Director Field Operation, Agriculture Department into the irregularities of appointment of appellant. The Inquiry Officer, after conducted the inquiry submitted his Report (*Annex;-G*) dated 31.07.2015 wherein he gave his findings in support of the appellant.
4. **That** vide impugned office order dated 31.12.2015 (*Annex;-H*) the services of the appellant were terminated by Respondent No.2 in highly illegal and arbitrary manner against which, appellant preferred a departmental appeal (*Annex;-I*) before the Respondent No.2 but the same was not disposed of within the statutory period of 90 days, hence this appeal inter-alia on the following grounds:-

Grounds:

- A. **That** Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned order, which is unjust, unfair and hence not sustainable in the eye of law.
- B. **That** the impugned order was issued through an unlawful and malafide manner without any reason and justification muchless lawful so much so that even the complainant himself dubbed the allegations as utter false and disowned the same pointblank but inspite of the same, the impugned order was issued in a highly arbitrary, rash and fill-in-the-blank manner.
- C. **That** the Inquiry Officer in his detailed report also gave findings in favour of the appellant after collecting the evidence but inspite of the same the services of the appellant were terminated which show that the competent authority had

predetermined the termination of the appellant at all costs, therefore, the impugned order being malafide, malicious is void ab-initio against the norms of justice and fair-play and therefore not maintainable.

- D. **That** appellant being a civil servant was required to be proceeded in accordance with law as per the mandate of Section-16 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with the enabling provisions of the Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules-2011 but the law was not followed while issuing the impugned order which is resultantly void and hence liable to be set aside.
- E. **That** neither Charge Sheet and Statement of allegations were issued to appellant nor was he provided opportunity of defence or Show Cause Notice or opportunity of personal hearing which are the mandatory requirements of law and in absence whereof the impugned termination order is nullity in the eye of law and liable to be set aside.
- F. **That** appellant is a confirmed employee of the Department who had rendered 3½ years service in the Department quite satisfactorily and was appointed in accordance with law after observing the required codal formalities, however, if there is/was any irregularity which though is not there but for which the competent authority is responsible and not the appellant.
- G. **That** appellant would like to offer some other grounds during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

(۱۰/۰۴/۲۰۱۶)

Appellant
Through

Khaled Rahman,
Advocate
[Signature]
Supreme Court of Pakistan

Dated: ___/04/2016

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2016

Ramdad Khan..... Appellant

Versus

The DG Agriculture and others..... Respondents

Application for suspending the operation of the impugned order dated 31.12.2015 and restraining the Respondents from filling the disputed posts till the final disposal of the instant appeal.

Respectfully Sheweth,

1. That the above titled service appeal is being filed today which is yet to be fixed for hearing.
2. That the facts alleged and grounds taken in the body of main appeal may kindly be taken as an integral part of this application, which make out an excellent prima facie case in favour of applicant/ appellant.
3. That the balance of convenience also lies in favour of applicant/appellant and in case the impugned order is not suspended and Respondents are not restrained from filling the disputed posts, then the applicant/appellant will suffer irreparable loss.

It is, therefore, humbly prayed that on acceptance of this application, the operation of the impugned order dated 31.12.2015 may graciously be suspended and Respondents be restrained from filling the disputed posts till the final disposal of the main appeal.

(Handwritten signature)

Applicant

Through

Khaled Rahman,
Advocate,
Supreme Court of Pakistan

Dated: ____/04/2016

Verification

Verified that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

(Handwritten signature)
Applicant/Appellant

OFFICE OF THE DISTRICT DIRECTOR AGRICULTURE (EXTENSION) NOWSHERA.

OFFICE ORDER.

ANNEA

Mr. Ramdad Khan S/o Roghan Shah is hereby appointed as Field Worker BPS-01 @ (Rs.4800-150-9300). plus usual allowances as admissible under the rules and sanctioned by the Government from time to time against the vacant post of Field Worker in Office of the District Director Agriculture (Extension) Nowshera with effect from the date of arrival for duty. His appointment is subject to the following terms and conditions.

1. That the appointment shall be purely on regular basis and his service shall be terminated on 14-days' notice without assigning any reason irrespective of the fact that he is holding a post other than one to which he is originally recruited or on the payment of 14-days' pay in lieu of the notice.
2. That in case he wishes to resign at any time, one month notice shall be necessary or in lieu thereof one month pay shall be forfeited.
3. That he shall be Governed by the Govt; of Khyber Pakhtunkhwa Govt; Servants (efficiency and discipline rules 2011) and all other instruction as may be issued by the Govt; time to time in this behalf.
4. That his appointment to the above post shall not confer on him any right of regular issued by the Govt; from time to time in this behalf Seniority/ promotion/ pension.
5. He will be regular contributor towards G.P.Fund as per Govt. Rules.
6. That he shall be entitled to all facilities relating to pay, leave, TA and Medical attendance etc, as may be admissible to the Govt; Servants.
7. He will remain on probation for a period of one year extendable up to two years and his services will liable to termination without any notice during the initial/extended period of probation.
8. He will not be entitled to any TA/DA for joining the duty as Field Worker in the department.
9. That he shall produce Medical Fitness certificate from the authorized Medical Superintendent.
10. If the above terms and conditions are acceptable to him, he may report for duty within ten (10) days and will produce original documents.

Sd/- (LIAQAT ALI)
DISTRICT DIRECTOR
AGRICULTURE (EXTENSION)
NOWSHERA.

No. 303-06 / DDA (E) NSR.

Dated Nowshera, the 03 / 05 / 2013.

Copy forwarded to:-

1. Director General Agriculture (Extension) Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer, Nowshera.
3. Mr. Ramdad Khan S/o Roghan Shah Village Kheshgi Shagai Mohallah Ahmad Nagar District Nowshera.
4. Office record file.

Ate

d/c
DISTRICT DIRECTOR

ANNEX B

5

ایکس ۱۰ ایر (AT) ۲۲

ایمپلائمنٹ سٹڈی سٹار جیٹریٹیشن کارڈ
ضروری

O.P.S.S.

SERVICE UN-PAID

بین امیدواروں کے پاس تعارفی کارڈ ۱۳۔ (x) موجود نہ ہوں۔ ان کو
ایمپلائمنٹ ایکس چینج کا نامزد کردہ تصور نہ کیا جائے۔

بخدمت جناب منیجر صاحب
ایمپلائمنٹ ایکس چینج
نوشہرہ

رجسٹریشن نمبر - 239/MT/B
زادہ خان والہ رمضان شاہ
پتہ گاؤں ٹو پیگی مشوگی کھیل و فیلم نوشہرہ
تاریخ 28.11.2013
MANAGER
Employment Exchange
Nowshera

تاریخ 28.11.2013
28.11.2013

ضروری کی اطلاع

بخدمت آپ کو اطلاع ہے کہ جو امیدوار اپنی کارڈ ایکس چینج کو جان کریں۔
اس کارڈ پر کٹ لگاؤ کی ضرورت ہے۔

Ate I

امیدواروں کیلئے پداریا

ندم تہدید کی صورت میں آپ کا رجسٹریشن منسوخ سمجھا جائیگا۔
جب کبھی بھی آپ ایکس چینج میں نمبر سے ملازمت کے سلسلہ
میں ملاقات کیلئے آئیں تو کارڈ ہذا ضرور ہمراہ لائیں۔
تہذیب و کتابت میں رجسٹریشن نمبر اور اکویشن کوڈ نمبر کا حوالہ
ضرور دیں۔

جگہ برائے تہذیب و امیدوار

پہاں دکان

حوائج کارکن

رجسٹریشن نمبر تاریخ

نام اکویشن کوڈ نمبر

تاریخ

(رجسٹریشن کوڈ نمبر کے ساتھ)

ملازمت لگائی ہے

تاریخ

6

کتابخانه اسلامیہ کراچی

ANNEX C

3 $\frac{5}{9813}$

4 $\frac{5}{2117}$

کتابخانه اسلامیہ کراچی

کراچی

7 $\frac{5}{943}$

آپ کا نام

کتابخانه اسلامیہ کراچی

Accepted
AD

Ate Q

SERVICE BOOK

7

PRINTED

OF

رامداد خان

Mr. Ramdad Khan

S/o Rahghan - Shah

Designation Field Worker

Department Agriculture Extension

Atte

Price : Rs. 50/-

PRINTED BY:
STATIONERY & PRINTING DEPARTMENT, GOVERNMENT OF KHYBER PAKHTUNKHWA,
PESHAWAR

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

8

Name: Mr Ramdad Khan

Race: Alghen

Residence: Villages Khes-hgi, Shogai, Mahalleb Ahmad Naggar,
Tehsil and Distt: Nowshera

Father's name and residence: Raghen Shah

Date of birth by Christian era as nearly as can be ascertained: 01-01-1975

Exact height by measurement: 5-9

Personal marks for identification: NIL

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: Ring Finger:

Middle Finger: Fore Finger:

Thumb: Ate

Signature of Government Servant: (Signature)

10. Signature and designation of the Head of the office, or other Attesting Officer. DISTRICT DIRECTOR
Agriculture Extension
Nowshera

8	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		
	<p>Signature of the head of the office or other attesting officer</p> <p><i>[Signature]</i></p> <p>DISTRICT DIRECTOR Agriculture Extension Nowshera</p>	<p>Date of termination or appointment</p> <p>30 ¹¹/₂₀₁₃</p>	<p>Reason of termination (such as promotion, transfer, dismissal, etc.)</p> <p>Annual increment</p>	<p>Signature of the head of the office or other attesting officer</p> <p><i>[Signature]</i></p> <p>DISTRICT DIRECTOR Agriculture Extension Nowshera</p>				<p>Signature of the head of the office or other attesting officer.</p> <p><i>[Signature]</i></p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government Servant</p> <p><i>(9)</i></p>
	<p>Signature of the head of the office or other attesting officer</p> <p><i>[Signature]</i></p> <p>DISTRICT DIRECTOR Agriculture Extension Nowshera</p>							<p>Signature of the head of the office or other attesting officer.</p> <p><i>[Signature]</i></p>	<p>Appointed as Field Worker BPS-01 vide District Director Agriculture (Ext) Nowshera office order No 303-06/DDA dated 03-05-2013.</p>
	<p>Signature of the head of the office or other attesting officer</p> <p><i>[Signature]</i></p> <p>DISTRICT DIRECTOR Agriculture Extension Nowshera</p>							<p>Signature of the head of the office or other attesting officer.</p> <p><i>[Signature]</i></p>	<p>Service verified from pay roll record w-e from 3-5-2013 to 30-11-2013</p>
	<p>Signature of the head of the office or other attesting officer</p> <p><i>[Signature]</i></p> <p>DISTRICT DIRECTOR Agriculture Extension Nowshera</p>							<p>Signature of the head of the office or other attesting officer.</p> <p><i>[Signature]</i></p>	<p>Granted/ Sanction One pre-mature increment vide Finance Deptt. Notification No. FD(SO SR-D)2-124/2014 dated 14-07-2014.</p>
	<p>Signature of the head of the office or other attesting officer</p> <p><i>[Signature]</i></p> <p>DISTRICT DIRECTOR Agriculture Extension Nowshera</p>							<p>Signature of the head of the office or other attesting officer.</p> <p><i>[Signature]</i></p>	<p>T.R. No 994 10-10-2014</p> <p>Drawn Rs. 654/- on a/c of one pre-mature increment w-e of 1 ⁷/₂₀₁₄ to 30 ⁰⁷/₁₄.</p>
	<p>Signature of the head of the office or other attesting officer</p> <p><i>[Signature]</i></p> <p>DISTRICT DIRECTOR Agriculture Extension Nowshera</p>							<p>Signature of the head of the office or other attesting officer.</p> <p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>

1	2	3	4	5	6	7	8	9
Name of Post	Whether substan- tive 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 "pay"	Date of Appointment	Signature of Government serv	Signature and D head of office attest columns 1
Field Worker 4800-150-9300	officiating		52.50/-			12/2014		DISTR Agricu
do	do		Shed			12		
Revised Pay Scale 6210-195-12000			6795/-			17/2015		DISTR Agricu
do	do		6980/-			12/2015		DISTR Agricu

6

DISTR
Agricu

DISTR
Agricu

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10 10

8	9	10	11	12	13		14	15
				Leave				
Name and Designation of head of the office attesting officer (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	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		Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Period	Government to Which debitable		
DISTRICT DIRECTOR Agriculture Extension Nowshera	30-11-2014	Annual Increment				Service verified from Pay roll record w/o from 1-12-2013 to 30-11-2014.		
DISTRICT DIRECTOR Agriculture Extension Nowshera		Revision of Pay Scale 2015						
DISTRICT DIRECTOR Agriculture Extension Nowshera	30-11-2015	Annual Increment				Service verified from Pay roll record w/o from 1-12-2014 to 30-11-2015		
DISTRICT DIRECTOR Agriculture Extension Nowshera								

- ① مایون خان سیکرٹری زراعت پشاور
- ② ضیاء اللہ ٹورڈ ڈائریکٹر اینی کریشن پشاور
- ③ قیاس پادار ڈائریکٹر جنرل زراعت پشاور

10

11

مہتمم :- غیر قانونی سرکاری

جناب عالی! مجھے بائزر ذرائع سے معلوم ہوا ہے کہ تقریباً 10 جیلے پہلے ضلع نوشہرہ میں ڈسٹرکٹ ڈائریکٹر زراعت نے تین ٹرکوں کو بغیر اجازت اشتہار کے فیلڈ کے اسمبلیوں پر مبلغ ایک لاکھ پانس ہزار فی ٹرک کے حساب سے بھری کیا ہے جس میں دو ٹرکے ضلع نوشہرہ اور ایک ٹرک ضلع جاسدہ کا ہے۔ اس کا نام اجبار میں اشتہار آیا تھا اور نہ ہی حکمہ کو اس کے متعلق آگاہ ہے نہ DPC بروٹی ہے بلکہ ضلعی آفسیئر نے رشوت بیکر تینوں کو بھری کیا ہے اور میرا کہتے بات یہ ہے کہ آج تک یہ تینوں ماہانہ تنخواہ وصول کر رہے ہیں۔ اور دفتر کو ایک دن پہلے ڈیوٹی پر نہیں آتے ہیں بلکہ نصف تنخواہ ضلعی آفسیئر (نیشنل) پیامت علی کو دیتے اور نصف غلط خود لیتے ہیں۔

ان ٹرکوں کے نام: 15 نوید ⑤ امداد ⑤ بلال ہیں۔

یہ اس علاقہ کے لوگوں کے ساتھ نا انصافی ہے

تحریک انصاف کی حکومت میں ایسی دلیوری سے غیر قانونی ہتھیار میرا نگی کی بات ہے۔

حکیمانہ انکوائری کی درخواست ہے اس سے پہلے بھی اس زمانہ بدنامی امن کے بارے میں اس کیس کیسوں کے بارے میں رکو چکا ہوں مگر مجھے پانچواں کی وجہ سے امن رچ نکلنے میں کامیاب ہو سکتا ہے۔

العارضی

مفتاب علی

جنرل سیکرٹری قائم سروسز سنٹر

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بیاب قیاس بگاڑ دینا جس پر زراعت کے مسائل اور :-

مضمون :- تردیدی بیان بابت غیر قانونی کھدیاں :-

صداقت عالی :- عدالت نام سے شائع ایک مذہب مالہ آفسر کو کھدیا گیا ہے

جس میں یہ کہا گیا ہے کہ ضلعی زراعت آفسٹر نے تین ٹرکوں کو لکھنؤ اور ڈیرہ گڑھانہ
میلڈور کھدیا ہے۔ اور ایک فیلڈ ڈزٹر سے متعلق ایک ٹرک کو دیکھا جس پر زراعت مضمون
کہا گیا ہے۔ اور افراد کھدیاں دس مہینوں سے ڈیڑھ گھنٹے نہیں آتے۔

بلکہ تینوں میں مضمون کے آدھا تہیہ اہ نذرت علی کو دیتا ہے۔ اور آدھے آدھے آواز خود کھاتا ہے
زراعت یہ مذہب مالہ بیانات سفید جھوٹ کا پلڈو ہے۔ اس میں کوئی صداقت
نہیں۔ بلکہ من گھڑت کہانی ہے۔ اور اس میں صداقت زراعت پر ابھری نہیں ہے۔

بلکہ مجھے بدنام کرنے کا ایک سازش ہے۔ کیونکہ اس درجہ اسیت پر سہرا کوئی
شکاف ہے۔ نہ ایڈریس ہے۔ اور نہ شناختی کارڈ Contact غیر جملہ یہ ایک
مقام خط ہے۔ جو کہ کبھی نہ تمام کی کردار کرتی ہے۔ مگر اس قسم کے بیانات

سے اب کوئی تعلق ہے۔ نہ پہلے میں اس قسم کے بیانات لکھی تھیں۔
اور نہ کوئی واسطہ رہا ہے۔ میں کہہ لوں کہ تردید کر رہا ہوں۔ مگر یہ نہ سہرا خط ہے
اور نہ میں نے کسی سے کھواہی ہے۔ بلکہ سہرا جھوٹ پر مبنی ہے۔
اور اس پر کوئی عمل درآمد نہ کیا جائے۔

نوٹ :- درجہ مالہ بیانات ایک فرضی حوالے سے لکھے گئے ہیں۔ جس کا میں

ذمہ نہ کرتا ہوں۔ بلکہ مجھے ایک فرضی کردار میں پھنسا دیا گیا ہے۔
اس کا میں لہی کرتا ہوں۔

اور آفسروں کے لئے ایسے شکیات کے خطوط کو پڑھ کر روتی ٹوٹ کر کی نذر کرنے

اقتا علی :- جنرل سیکرٹری فارم سروسز سٹریٹ :-

افسار علی ولد زبیر خان سیکرٹری ایچ ایم اے مری ہاؤس

17246292129-1
15/7/2015

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Inquiry Report.

In compliance to Director General, Agriculture (Extension), Khyber Pakhtunkhwa, Peshawar order No.14180-81, dated 29.06.2015, the undersigned managed to probe into the Complaint lodged by Mr. Aftab Ali, General, Secretary, Farm Services Center (FSC), Nowshera against the alleged illegal appointments by the District Director Agriculture, Nowshera.

Background:

The complainant, Mr. Aftab Ali, General Secretary FSC, Nowshera had leveled the following allegations:-

1. The following three (3) Field Workers were appointed without advertisement ten months before:
 - (1) Naveed
 - (2) Imdad
 - (3) Bilal
2. Out of the three Field Workers, one belongs to District Charsadda.
3. The appointments have been made through bribery.
4. All the three Field Workers receive salaries without performing duties.

Proceeding.

On 22.7.2015, the District Director Agriculture, Nowshera was informed on phone that the staff concerned along with relevant record should be present in his office on 24.7.2015 for necessary interrogation.

On 24.7.2015, visited the office of District Director Agriculture, Nowshera held a meeting with him and discussed in detail the complaint.

He was asked to call the complainant but it was told that has submitted a written statement in which he has stated that neither he has lodged complaint against the appointments of Field Workers in the office of District Director Agriculture, Nowshera nor he know about such complaint. It is only an effort to create mis-understanding with the Agriculture Department. The statement has been duly signed by him. To confirm the statement, he was contacted on phone and he endorsed and owned the statement (Annexed as "A").

The District Director Agriculture, Nowshera explained that that Mr. Aftab Ali, the alleged complainant is no more General Secretary of the FSC. He is only a registered grower of FSC and has a close contact / cooperation with Agriculture Extension Staff.

He further explained that during March & April 2014, Junior Clerk and Field Workers posts were advertised in newspaper. The Junior Clerk was appointed on the basis of test and interview and the Field Workers were appointed on the recommendation of MPA concerned as per government policy (Appended as "B").

It was told that during May 2013, M/S Naveed Ahmad, Ramdad Khan and Muhammad Bilal were appointed as Field Workers through Employment Exchange (Annexed as "C").

The CNICs and Domiciles of the Field Workers concerned were examined thoroughly and noted their addresses as below:-

- (1) Mr. Naveed Ahmad S/O Naimat Khan, Village Kandi Taza Din, Pabbi Nowshera, CNIC#17201-1351362-7.
- (2) Mr. Ramdad Khan S/O Roshan Shah, Present Resident of Village Khweshki, District Nowshera while Permanent Address is Prang, Tehsil & District Charsadda.

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(B) Mr. Muhammad Bilal S/O Shakirullah, Present Resident of Village Momin Garhi, Akbar Pura Nowshera and Permanent Address is Village Lala PO Tarnab Farm, District Peshawar.

It is to be mentioned that the complainant has inscribed "Imdad" in the complaint while name of the Field Worker is "Ramdad Khan".

The Field Workers were interviewed individually. They all denied the allegations of bribery and paying half salary to the District Director Agriculture and his staff. They provided affidavits to this effect duly signed by them (Annexed as "D").

Attendance Record:

Checked the attendance of the alleged Field Workers posted at Govt. Seed Farm, Pirsabak, District Director Agriculture Office and Akbar Pura Circle at different times and noted that they have performed duties. About the attendance/duty of Mr. Ramdad Khan, the Field Assistant with whom he has been attached, has given written statement that he has not maintained the attendance register but stated that "Mr. Ramdad Khan Field Worker has been performing duty since May 2013 up-till now at Khweshki Circle Nowshera under his control which has been countersigned by the Agriculture Officer of the Circle (Annexed as "E").

*Findings.

The complainant has disowned the complaint and stated that in the past too similar incident has occurred to him which he had denied at that time.

The appointments during 2014 were made through advertisement while the appointments of three Field Workers during 2013 were made through Employment Exchange. Out of the three Field Workers, two Field Workers have temporary addresses of District Nowshera while permanent Districts are Peshawar and Charsadda.

Mr. Basit Ali, Khweshki Union Council has not maintained the attendance register of the field staff. It seems that the District Director Agriculture/Agriculture Officer of the Circle have not guided the Field Assistant.

Recommendations.

- (i) Present residential addresses of the two Field Workers namely M/S Ramdad Khan and Muhammad Bilal may be verified by the newly elected Village Council Chairman / Councilors.
- (ii) Their Domiciles and CNICs may also be verified from the district concerned and NADRA respectively.
In light of the above reports, the cases may be examined as per government recruitment policy of Class-IVs.
- (iii) The District Director Agriculture, Nowshera may be warned and advised to monitor/ check the field staff regularly and advise the sub-offices / Field Assistants for maintaining proper record of staff attendance and daily work done register.

(Fazli Mabood)
Director Field Operation/
Inquiry Officer.

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OFFICE OF THE DISTRICT DIRECTOR AGRICULTURE (EXTENSION) NOWSHERA.

OFFICE ORDER.

ANNEX 1 (2B) 15

In pursuance of the Director General Agriculture Extension Khyber Pakhtunkhwa Peshawar letter No.16/122/Estt;/24634/DG dated Peshawar the 22/12/015.

The services of the following Field Workers of this office are hereby terminated with immediate effect as per following limitation /facts observed by the Director Field Operation during inquiry conducted regarding the unlawful/ illegal abinitio appointment of the said officials.

- i. No NOC was obtained from Deputy Commissioner Nowshera.
- ii. Neither the posts were advertised nor list of candidates were obtained from employment Exchange.
- iii. No call letters were issued to the candidates.
- iv. No working paper was prepared.
- v. No attendance sheet was maintained.
- vi. No Department Selection Committee meeting was held.
- vii. Neither interview was held nor merit list was prepared.
- viii. No Minutes of the meeting were issued.

S.No.	Name	Designation.
1.	Mr. Ramdad Khan	Field Worker
2.	Mr. Muhammad Bilal	-do-
3.	Mr. Naveed Ahmad	-do-

This order will be take effect from 01/01/2016.

Sd/-(Mian Sultan Hussain Shah)
DISTRICT DIRECTOR
AGRICULTURE (EXTENSION)
NOWSHERA.

No. 1187-96 /DDA (E) NSR.
Dated Nowshera, the 31/12/2016.
Copy to:-

1. The Director General Agriculture Extension Khyber Pakhtunkhwa Peshawar with reference to his letter No.16/122/Estt;/24634/DG dated 22/12/2015.
2. The Agriculture Officer Pabbi.
3. The Agriculture Officer Nowshera.
4. The District Account Office Nowshera.
5. All official Concerned.

AG

Attested to be
True Copy

S. Hussain Shah
DISTRICT DIRECTOR
AGRICULTURE (EXTENSION)
NOWSHERA.

ANNEX I

16

BEFORE THE DIRECTOR GENERAL,
AGRICULTURE, (EXTENTION KPK) PESHAWAR

Subject: Representation / departmental appeal against
the impugned office order No. 1187-96/DDA (E)
NSR dated 31/12/2015.

Respectfully Sheweth,

1. That the appellant was appointed as field worker in the Agriculture Extention District Nowshera vide order No. 303-06 DDA (E) NSR dated 03/05/2013, after completion of all codal formalities.
2. That the appellant has performed his duties for about three years with full devotion and dedication without any complaint from any quarter and has never remained absent.
3. That an fake application allegedly filed by one Aftab Ali General Secretary, Farm Services centre, Nowshera, by leveling certain unformeled allegations.
4. That for investigation of the aforesaid allegation an inquiry was conducted, wherein Aftab Ali appeared before the inquiry officer and denied the allegations as well as complaint.

Atta

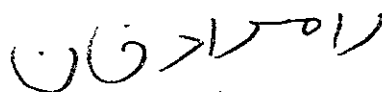
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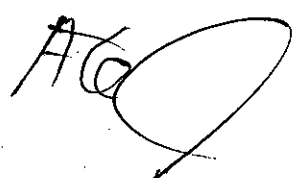
5. That the inquiry officer also declared the allegation to be false, frivolous and recommended that the District Director Agriculture be warned and to verify the CNICs of the appellant.
6. That despite the exoneration by the inquiry officer and contrary to the findings of the inquiry officer, the appellant has been terminated from services, which is illegal, against the law and norms of natural justice, hence, the same is not sustainable in the eyes of law and is liable to be set aside and on this score alone the appellant is liable to be reinstated with all back benefits.

It is therefore, prayed that on acceptance of this departmental appeal the impugned order No. 1187-96/DDA (E) NSR dated 31/12/2015 may very graciously be set aside and the appellant be reinstated with all back benefits.

Your's Obediently,



RAMDAD KHAN
Ex Field Worker
Nowshera.



WAKALAT NAMA

IN THE COURT OF

Justice Javed Iqbal

Ramdad Khan

Appellant(s)/Petitioner(s)

VERSUS

Gout etc

Respondent(s)

I/We _____ do hereby appoint
Mr. Khaled Rehman, Advocate Supreme Court of Pakistan in the above
mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by

Khaled Rehman,
Advocate,
Supreme Court of Pakistan

Signature of Executants

3-D, Haroon Mansion
Khyber Bazar, Peshawar
Off: Tel: 091-2592458

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No.429/2016

Mr. Ramdad Khan,
Ex-Field Worker, o/o District Director Agriculture
Nowshera.

Appellant

VERSUS

1. Director General,
Agriculture (Extension)
Khyber Pakhtunkhwa, Peshawar.
2. The District Director Agriculture, Nowshera.

Respondents

PARA-WISE COMMENTS ON BEHALF OF RESPONDENTS NO.1 & 2

PRELIMINARY OBJECTIONS

1. That the appellant has got no locus standi to file the instant appeal.
2. That the appeal is not maintainable in its present form and liable to be dismissed.
3. That the appellant has no cause of action to file the instant appeal.
4. That the appellant has deliberately concealed the material fact from this Hon'ble Service Tribunal.
5. That the appellant has not come to this Hon'ble Service Tribunal with clean hand.
6. That the appeal is time barred.

ON FACT PARA-WISE

Para-1 Incorrect, The Ex-District Director Agriculture, (Extension) Nowshera, illegally appointed the appellant without completed codal formalities prescribed for appointment to the post were observed/adopted i.e neither the post were advertised, nor list of candidates were obtained from Employment Exchange, no call letters were issued to the other candidates, no attendance sheet was maintained, no Departmental Selection Committee meeting was held, neither interview was held, nor Merit list was prepared, no minutes of the meeting were issued and no NOC was obtained from DCO Nowshera.

Para-2 Pertains to record.

Para-3 Incorrect, A written complaint received to the Respondents No 1 regarding illegally appointment of the appellant along with others in the office of Respondent No 2 without observing codle formalities vide dated 17-06-2015, (Annexure-A). The Respondents No 1 nominated Director Field Operation H/Q office as inquiry officer to probe into the complaint lunch by Mr. Aftab Ali General Secretary Form Service Center Nowshera vide office order No 16/122/Estt/14180-81/DG dated 29-06-2015, (Annexure-B). The Inquiry officer after conducted the inquiry and recommend that the Domiciles & CNICs may be verified from the District concerned and NADRA respectively. According to verification of NADRA the appellant is not bonafide residence of District

Nowshera. The appointment made is unlawful illegal ab-initio and against the prescribed rules and policy.

Para-4 Incorrect, According to the rules the appellant was illegally appointed without completed codle formalities, the services of the appellant was terminated the Respondent No 2 against which appellant preferred Departmental appeal before the Respondent No 1. The Respondent No 1 were asked the appellant along with others to provide proof regarding illegal appointment to examine the appeal in light of required documents vide No 16 / 122 / Estt / 2861 - 63 / DG dated 08-02-2016, (Annexure-C). But the appellant failed to provide the requisite documents, thus the appeal of the appellant was rejected vide No 6304-6/DG dated 06-04-2016, (Annexure-D).

GROUNDS

Para-A Incorrect, The Respondents have treated the appellant in accordance with Law, Rules and Regulation and no violation of Article 4 of the constitution of Islamic Republic of Pakistan 1973.

Para-B Incorrect, Detail reply / comments have been given in Para above of facts.

Para-C Incorrect, The inquiry officer not gave finding in favor of the appellant, the services of the appellant were terminated on the grounds given in the paras above.

Para-D Incorrect as per Para-A.

Para-E The impugned order is in accordance with Law.

Para-F No comments, hence denied.

Para-G No comments, hence denied.

It is hereby humbly prayed that on acceptance of the instant comments, the appeal of the appellant may kindly be dismissed.

RESPONDENTS


DIRECTOR GENERAL,
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA, PESHAWAR


DISTRICT DIRECTOR AGRICULTURE,
NOWSHERA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No.429/2016

Mr. Ramdad Khan,
Ex-Field Worker, o/o District Director Agriculture
Nowshera.

Appellant

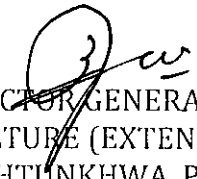
VERSUS


- 1- Director General,
Agriculture (Extension)
Khyber Pakhtunkhwa, Peshawar.
- 2- The District Director Agriculture, Nowshera.

Respondents

COUNTER AFFIDAVIT

We the undersigned hereby solemnly declare / affirm that the contents of the Para-wise reply / comments are true and correct to the best of our knowledge and belief and nothing has been kept secret from this Honorable Tribunal.


DIRECTOR GENERAL,
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA, PESHAWAR


DISTRICT DIRECTOR AGRICULTURE,
NOWSHERA

16/122

Annex A جناب

- ① مایون خان سیکرٹری زراعت پشاور
- ② ضیاء اللہ ٹورو ڈائریکٹر انٹی کرپشن پشاور
- ③ قیاس پادار ڈائریکٹر جنرل زراعت پشاور

مضمون :- غیر قانونی ہیرتیاں

جناب اعلیٰ! مجھے باعبر ذرائع سے معلوم ہوا ہے کہ تقریباً 10 مہینے پہلے ضلع نوشہرہ میں ڈسٹرکٹ ڈائریکٹر زراعت نے تین شرکوں کو بغیر اجازت اشتہار کے فیلڈورکر کے اسمبلیوں پر مبلغ ایک لاکھ پچاس ہزار فی ٹن کے حساب سے بھرتی کیا ہے۔ جس میں دو شرکے ضلع نوشہرہ اور ایک شرکے ضلع جاسدہ کا ہے۔ اس کا نام اجبار میں اشتہار آیا تھا اور نہ ہی محکمہ کو اس کے متعلق آگاہی ہے۔ DPC ریوٹی ہے بلکہ ضلعی آفیسر نے رشوت بیکر تینوں کو بھرتی کیا ہے اور حیران کن بات یہ ہے کہ آج تک یہ تینوں ماہانہ تنخواہ وصول کر رہے ہیں۔ اور دفتر کو ایک دن کیلئے ڈیوٹی پر نہیں آتے ہیں بلکہ نصف تنخواہ ضلعی آفیسر (ریٹینو) بیاقت علی کو دیتا ہے اور نصف خود لیتے ہیں۔

ان شرکوں کے نام: ① نونید ② امداد ③ بلال ہیں۔

یہ اس علاقے کے لوگوں کے ساتھ نا انصافی ہے

قریب انصاف کی حکومت میں انٹی دلیری سے غیر قانونی ہیرتیاں

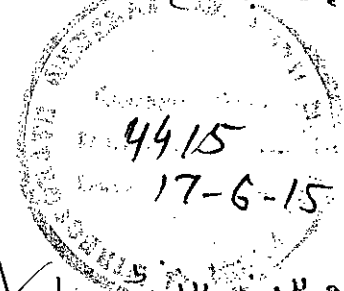
حیرانگی کی بات ہے۔

حکمرانہ انکوائری کی درخواست ہے اس سے پہلے بھی اس زمانہ دنیا

اعتراف کے بلکہ میں سٹی کیسوں کے بارے میں لکھ چکا ہوں مگر کچھ باتوں

کی وجہ سے امنرج نکلنے میں کامیاب ہو جاتا ہے۔

العارضہ
آفتاب علی



1467
18/6/15

18/6/15
17/6

جنرل سیکرٹری فارم سروسز پشاور

Attested
Deer

DIRECTORATE GENERAL AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER

Mr. Fazli Mabood, Director Field Operation HQ is hereby nominated enquiry officer to probe into the complaint launched by Mr. Aftab Ali, General Secretary Farm Services Centre, Nowshera regarding illegal appointment in the District (Copy attached for necessary action).

The enquiry officer should submit fact finding report within Ten (10) days for necessary action.

Sd/- (QAYASH BAHADER)
DIRECTOR GENERAL
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA
PESHAWAR

No.16/122/Estt/ 14180-81 /DG

Dated Peshawar: the 29/6 /2015

Copy forwarded to:-

1. Mr. Fazli Mabood, Director Field Operation HQ.
2. The District Director Agriculture, Nowshera *for information and provision of relevant record to the enquiry officer.*
For necessary action.

Attested
Ben
Baqeer Muhammad
Agriculture Officer
Pabbi Nowshera

25/6/2015
DIRECTOR GENERAL
29/6
26.6.15

**DIRECTORATE GENERAL AGRICULTURE
(EXTENSION) KHYBER PAKHTUNKHWA, PESHAWAR**

No.16/122/Estt/2861-63/DG Dated Peshawar: the 8/2 /2016

To:

Mr. Ramdad Khan,
Ex-Field Worker office of the DDA, Nowshera.

Mr. Naveed Ahmad,
Ex-Field Worker office of the DDA, Nowshera.

Mr. Muhammad Bilal,
Ex-Field Worker office of the DDA, Nowshera.

Subject: REPRESENTATION / DEPARTMENTAL APPEAL AGAINST THE
IMPUGNED OFFICE ORDER NO.1187-96/DDA (EXT) NSR DATED
31.12.2015.

Memo:

Reference your appeal dated NIL.

You are directed to provide the following proof regarding your
appointment to examine your appeals in light of the required documents.

1. NOC of DCO, Nowshera.
2. Advertisement of Newspapers of the post or list of employment
Exchange with Covering letter.
3. Call letters.
4. Working paper.
5. List of attendance sheet.
6. Copy of Departmental Selection Committee meeting.
7. Copy of merit list.
8. Copy of minutes of meeting.

Endst. No. 2864

[Signature]
28/12/2016
DIRECTOR GENERAL
[Signature]
4/2/16

Copy forwarded to the District Director Agriculture, Nowshera for
information.

[Signature]
[Signature]
Basir Muhammad
Agriculture Officer
Pabbi Nowshera

[Signature]
28/12/2016
DIRECTOR GENERAL
[Signature]
4/2/16

Annex-D

HE

**DIRECTORATE GENERAL AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA, PESHAWAR**

No.16/122/Est/6304-6 /DG Dated Peshawar: the 6/6 /2016

To:

Mr. Ramdad Khan, ex-Field Worker,
Office of the DDA, Nowshera.

Mr. Naveed Ahmad, ex-Field Worker,
Office of the DDA, Nowshera.

Mr. Muhammad Bilal, ex-Field Worker,
Office of the DDA, Nowshera.

Subject: APPEAL FOR RE-INSTATEMENT
Memo:

Your appeals for re-instatement into service is hereby rejected due to time barred and non-observance of formalities required for recruitment.

Attended
Basir

Basir Muhammad
Agriculture Officer
Pabbi Nowshera

30/6/16
DIRECTOR GENERAL
29/3/16