

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR**  
**AT CAMP COURT ABBOTTABAD**

Service Appeal No. 469/2019

Date of Institution ... 27.12.2018

Date of Decision ... 19.01.2022

Arif Khan S/O Qaim Khan, Junior Scale Stenographer Office of  
Director Agriculture District Haripur.

... (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary  
Agriculture, Livestock and Cooperative Department Khyber  
Pakhtunkhwa Peshawar and three others.

... (Respondents)

-----  
MR. MUHAMMAD ARSHAD KHAN TANOLI,  
Advocate

--- For appellant.

MR. NOOR ZAMAN KHATTAK,  
District Attorney,

--- For respondents.

MR. SALAH-UD-DIN  
MS. ROZINA REHMAN

--- MEMBER (JUDICIAL)  
--- MEMBER (JUDICIAL)

**JUDGMENT:**

**SALAH-UD-DIN, MEMBER:-**

The brief facts as emanating from the record are that the appellant while serving as Junior Scale Stenographer (BPS-12) was granted Selection Grade in BPS-15 vide office order dated 26.04.1989. Vide Notification dated 30.06.2015, Government of Khyber Pakhtunkhwa Finance Department (Regulation Wing) accorded approval to one pay scale up-gradation to all Provincial Government Employees from BPS-06 to BPS-15 with effect from 01.07.2015, therefore, the appellant was also given one pay scale up-gradation from BPS-15 to BPS-16 and entry in this respect was made in his



service book. The appellant was paid pay and emoluments of BPS-16 with effect from 01.07.2015 till the date of his retirement i.e 31.12.2015. The District Director Agriculture District Haripur, however made an entry in service book of the appellant, whereby pay and allowances received by the appellant in BPS-16 were ordered to be recovered and the pension as well as commuted value of pension of the appellant was calculated by considering him as retired in BPS-15.

2. Notices were issued to the respondents, who submitted their comments, wherein they denied the assertions made by the appellant in his appeal.

3. Learned counsel for the appellant has contended that the appellant was already working in BPS-15 at the time of Notification dated 30.06.2015, therefore, he was entitled to one pay scale up-gradation to BPS-16; that the appellant was initially allowed one pay scale up-gradation and he was also paid pay and emoluments of BPS-16, however when his pension case was sent to the concerned quarter, the same was returned with wrong and illegal remarks that he is not entitled to one pay scale up-gradation; that the District Director Agriculture District Haripur made wrong and illegal entry in service book of the appellant, whereby it was ordered that pay and allowances received by the appellant in BPS-16 may be recovered from him; that the appellant is entitled to pension as well as commuted value of pension on the basic pay and emoluments of BPS-16 but the same were wrongly calculated on the basis of BPS-15.

4. On the other hand, learned District Attorney for the respondents has argued that Government of Khyber Pakhtunkhwa Finance Department has though issued Notification dated 30.06.2015, whereby one pay scale up-gradation has been allowed to all Provincial Government Employees, however the employees, who have been upgraded en-block or individually in the last five years, starting from 01.07.2010 were excluded from benefits of the

concerned notification in the light of its para-f; that the appellant was Junior Scale Stenographer (BPS-12) and as the said post was already upgraded to BPS-14 vide Notification dated 19.06.2012, therefore, the appellant cannot be granted one pay scale up-gradation and his request has rightly been turned down vide Government of Khyber Pakhtunkhwa Finance Department (Regulation Wing) letter No. KC/FD/SO(FR)/7-13/2012/6255 dated 23.02.2017.

5. Arguments heard and record perused.

6. A perusal of the record would show that the appellant was Junior Scale Stenographer, however in pursuance of Government of Khyber Pakhtunkhwa Finance Department Notification No. FD/(PRC)4-1/89 dated 24.01.1989, he was allowed Selection Grade BPS-15 vide office order dated 26.04.1989. Vide Notification dated 30.06.2015, issued by Government of Khyber Pakhtunkhwa Finance Department (Regulation Wing), one pay scale up-gradation was allowed to all Provincial Government Employees from BPS-06 to BPS-15. The only point for determination in the instant appeal is as to whether the appellant is entitled to one pay scale up-gradation or not. In order to hold the appellant disentitled to benefit of the Notification dated 30.06.2015, issued by Government of Khyber Pakhtunkhwa Finance Department (Regulation Wing), respondents have relied on para-f of the said notification, which is reproduced as below:-

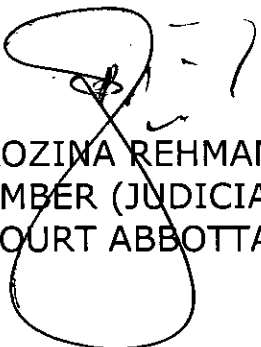
*" f) All Provincial Government Employees who have been upgraded en-block or individually in last five years starting from 01.07.2010 or have been granted special allowance/pay equal to 40% or more of their normal pay shall not be entitled for the instant up-gradation".*

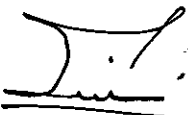
While going through the aforementioned para (f) of the concerned notification, those employees, who have been upgraded in en-block or individually in the period of five years starting from 01.07.2010 have been ousted from benefit of

one pay scale up-gradation. It is an admitted fact that the appellant was granted Selection Grade BPS-15 in the year 1989, therefore, we are of the view that his case does not fall within the mischief of para (f) of the concerned notification. Copies of service book of the appellant are available on the record, which would show that in light of concerned Notification dated 30.06.2015, entry regarding up-gradation of the appellant from BPS-15 to BPS-16 was made in his service book and pay as well as emoluments of BPS-16 were paid to him with effect from 01.07.2015 till the date of his retirement i.e 31.12.2015. However, while processing pension papers of the appellant, the appellant was wrongly held not entitled to one pay scale up-gradation. As discussed above, we are of the view that the appellant was entitled to one pay scale up-gradation from BPS-15 to BPS-16, therefore, the respondents are required to revise pension and commuted value of pension of the appellant on the basis of pay and emoluments of BPS-16 instead of BPS-15.

7. In light of the above discussion, the appeal in hand is allowed as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
19.01.2022

  
(ROZINA REHMAN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

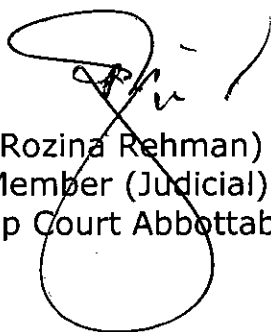
  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

ORDER  
19.01.2022

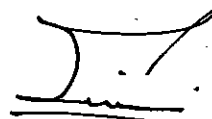
Appellant alongwith his counsel present. Mr. Amjid, Subject Matter Specialist alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand is allowed as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
19.01.2022



(Rozina Rehman)  
Member (Judicial)  
Camp Court Abbottabad



(Salah-ud-Din)  
Member (Judicial)  
Camp Court Abbottabad

17.01.2022

Appellant alongwith his counsel namely Mr. Muhammad Arshad Khan Tanoli, Advocate, present. Mr. Amjid, Subject Matter Specialist alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Arguments heard. To come up for order on 19.01.2022 before the D.B at Camp Court Abbottabad.



(Rozina Rehman)  
Member (J)  
Camp Court A/Abad



(Salah-ud-Din)  
Member (J)  
Camp Court A/Abad

19.05.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 27.09.2021.

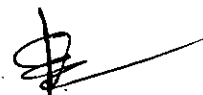


Reader

27.09.2021

Appellant in person and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

According to prayer in the appeal, the appellant seeks direction for revised pension and commuted value of pension on the basis of pay and emoluments of BPS-16 and difference of pension and commutation may also be paid to him. According to the retirement order of the appellant (annexure-E), he was treated as Junior Scale Stenographer which obviously is in BPS-14 <sup>PS</sup> and purported by the appellant. If the appellant succeeds in making out case for acceptance of his appeal, the revised order for his retirement in BPS-16 will follow. The District Accounts Officer has been arrayed as respondent No. 4 who is at the most a proforma respondent and there is no need of reply on his behalf. The written reply/comments on behalf of respondents No. 1 to 3 have already been submitted. To come up for arguments, on 17.01.2022 before D.B at Camp court, Abbottabad.



Chairman  
Camp Court, A/Abad

21.01.2021

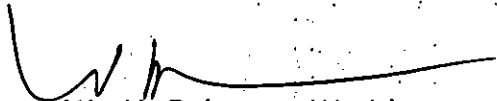
Due to COVID-19, the case is adjourned for the same on 16.02.2021 before D.B.

  
READER

16.02.2021

Junior to counsel for the appellant present. Mr. Riaz Khan Paindakhel learned Asst. AG present.

Written reply/comments on behalf of respondents not submitted, therefore, notice be issued to respondents for submission of reply/comments on 19.05.2021 before S.B at Camp Court. A/Abad.

  
(Atiq-Ur-Rehman Wazir)  
Member (E)  
Camp Court, A/Abad



16.09.2020

Appellant is present in person. Mr. Usman Ghani, District Attorney is also present.

Para-wise comments on behalf of respondents No. 1 to 3 has already been while neither written reply on behalf of respondent No. 4 submitted nor any representative on his behalf is present, therefore, notices be issued to him for submission of written reply/comments. File to come up for written reply/comments on behalf of respondent No. 4 on 19.11.2020 before S.B at Camp Court, Abbottabad.

(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

19.11.2020

Appellant is present in person. Mr. Usman Ghani, District Attorney and Mr. Amjid Ali, Subject Matter Specialist on behalf of respondents No. 1 to 3, are also present.

Written reply on behalf of respondents No. 1 to 3 has already been submitted while witten reply on behalf of respondent No. 4 not submitted. Learned District Attorney is directed to contact the respondents and furnish written reply/comments on the next date positively. File to come up for written reply/comments on 21.01.2021 before S.B at Camp Court, Abbottabad.

(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

20.01.2020

Appellant in person present. Written reply of respondent No.4 still awaited. Adil Khan Senior Auditor representative of respondent No.4 absent. Notice be issued to respondent No.4 and its absent representative for reply. Adjourn. To come up for written reply/comments of respondent No.4 on 18.02.2020 before S.B at Camp Court Abbottabad.



Member  
Camp Court, Abbottabad

Due to covid ,19 case to come up for the same on / /  
at camp court abbottabad.

Reader

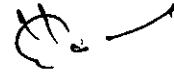
Due to summer vacation case to come up for the same on 1/6  
4/20 at camp court abbottabad.



Reader

22.10.2019

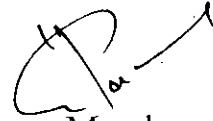
Appellant present in person. Counsel for the appellant present. Mr. Usman Ghani, District Attorney present. Written reply not submitted. Hafiz Muhammad Qasam, Asstt. for the respondents present. Representative of respondents seeks time. Granted. To come up for written reply/comments on 21.11.2019 before S.B at Camp Court, Abbottabad.



Member  
Camp court, A/Abad

21.11.2019

Clerk to counsel for the appellant present. Mr. Usman Ghani learned District Attorney alongwith Amjid S.M.S.P.P (for respondents No.1 to 3) present. Written reply on behalf of respondents No.1 to 3 submitted. None present on behalf of respondent No.4. Notice be issued to respondent No.4 for submission of written reply/comments. Adjourn. To come up for written reply/comments on behalf of respondent No.4 on 20.01.2020 before S.B at Camp Court, A/Abad.



Member  
Camp Court, A/Abad

21.06.2019

Counsel for the appellant present.

Contends that the appellant was allowed BPS-16 on 30.06.2015 and accordingly fixed his pay and allowances in the said pay scale were fixed. He retired on 31.12.2015 and an order for recovery of enhanced pay and allowances, as a result of BPS-16, was ordered from his pension/commutation. It was the argument of learned counsel that the benefit once allowed to a civil servant in accordance with law was not be withdrawn without any legal justification. The finalization of pension emoluments of appellant on the basis of BPS-15 was also uncalled for in the circumstances of the case.

The appeal is admitted for regular hearing in view of the contentions of the appellant. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 22.08.2019 before S.B at camp court, Abbottabad.

Appellant Deposited  
Security & Process Fee

Chairman  
Camp Court, A/Abad

22.08.2019

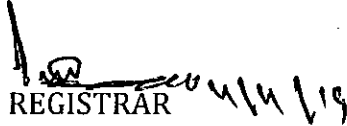

Clerk to counsel for the appellant present. Written reply not submitted. Amjad Subject Specialist representative of the respondent department present and requested for time to furnish written reply/comments. Granted. To come up for written reply/comments on 22.10.2019 before S.B at Camp Court Abbottabad.

Member  
Camp Court A/Abad

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 469/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/04/2019	<p>The appeal of Mr. Arif Khan resubmitted today by Mr. Muhammad Arshad Khan Tanooli 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-	9-4-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>21-6-19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Arif Khan son of Qaim Khan Junior Scale Stenographer Agriculture Department received today i.e. on 27.12.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of up-gradation order the appellant mentioned in para-3 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copy of order of recovery of pay mentioned in para-6 of the memo of appeal is not attached with the appeal which may be placed on it.
- ✓ 3- In the memo appeal many places have been left blank which may be filled up.

No. 2466 /S.T,

Dt. 28-12-2018.

*28/12/18*  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. M.Arshad Khan Tanoli Adv. A.Abad.

*case is re-submitted  
and completed as desired.*  
*M. Arshad Khan Tanoli*

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
Distt Bar Abbottabad

*The objections are still stand. The appeal in hand is returned again to the counsel for the appellant for completion and resubmission within 15 days.*

*25/3/19*  
REGISTRAR

No. 483 /S.T

dt. 25-3-2019

Sir,

- ① upgradation in BPS-16 is available at Page 41-A
  - ② order of recovery is placed at page 47
  - ③ Blanks has been filled
- re-submitted*

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
Distt Bar Abbottabad

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal No. 469/2018

Arif Khan S/o Qaim Khan, Junior Scale Stenographer office of Director  
Agriculture District Haripur.

...APPELLANT

**VERSUS**

Govt. of KPK, through Secretary Agriculture, Livestock and Cooperative  
Department KPK Peshawar and others.

...RESPONDENTS

**SERVICE APPEAL**

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4.	Copy of Notification dated 30/06/2015	13	"B"
5.	Copy of Service Book	14-40	"C"
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...APPELLANT

Through

Dated: \_\_\_\_\_/2018

  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal No. 469 / 2018 Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1811

Dated 27/12/18

Arif Khan S/o Qaim Khan, Junior Scale Stenographer office of Director  
Agriculture District Haripur.

**...APPELLANT**

**VERSUS**

- ✓ 1. Govt. of KPK, through Secretary Agriculture, Livestock and  
Cooperative Department KPK Peshawar.
- ✓ 2. Director General Agriculture Extension KPK Peshawar.
- ✓ 3. District Director Agriculture District Haripur
4. District Accounts Officer District Haripur.

**RESPONDENTS**

Filed to-day

Registrar

27/12/18

Re-submitted to -day  
and filed.

Registrar

4/4/19

**SERVICE APPEAL** UNDER SECTION 4 OF  
SERVICE TRIBUNAL ACT, 1974 FOR  
DECLARATION TO THE EFFECT THAT THE  
APPELLANT WAS SERVING AS JUNIOR  
SCALE STENOGRAPHER IN BPS-15 AND AS  
PER NOTIFICATION OF GOVT OF KHYBER



PAKHTUNKHWA FINACAE DEPARTMENT  
REGULATION WING DATED 30-06-2015, THE  
APPELLANT WAS GRANTED UP  
GRADATION FROM BPS-15 TO BPS-16 W.E.F  
01-07-2015 VIDE UPGRADATION  
NOTIFICATION DATED 30-06-2015. THE  
APPELLANT HAS BEEN RETIRED FROM  
SERVICE ON 31-12-2015. VIDE ORDER  
DATED 19-12-2014. THE APPELLANT'S  
PENSION AND COMMUTED VALUE OF  
PENSION HAS BEEN FINALIZED ON PAY  
AND EMOLUMENTS OF BPS-15 INSTEAD OF  
BPS-16 AT THE TIME OF FINALIZATION OF  
PENSION AND COMMUTED VALUE OF  
PENSION, WHICH IS PERVERSE  
DISCRIMINATORY AGAINST THE LAW AS  
WELL AS AGAINST THE NOTIFICATION  
DATED 30-06-2015. HENCE, THE APPELLANT  
IS ELIGIBLE TO HAVE HIS PENSION /  
COMMUTED VALUE OF PENSION ON THE  
BASIS OF PAY AND EMOLUMENTS OF BPS-  
16.

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**PRAYER:** ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO REVISE PENSION AND COMMUTED VALUE OF PENSION ON THE BASIS OF PAY AND EMOLUMENTS OF BPS-16 AND DIFFERENCE OF PENSION AND COMMUTATION MAY ALSO BE PAID TO THE APPELLANT. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

=====

Respectfully Sheweth: -

1. That appellant served as junior stenographer and was allowed selection grade from BPS 12 to BPS 15 on 26-04-1989. Copy of letter dated 26-04-1989 showing selection grade of the appellant from BPS-12 to BPS -15 is attached as Annexure A.

2. That Govt of Khyber Pakhtunkhwa finance department regulation wing allowed one pay scale up gradation from BPS-15 to BPS-16 w.e.f 01-07-2015 vide notification dated 30-06-2015. Copy of notification dated 30-06-2015 is attached as Annexure B.
3. That as per the said up gradation notification, the appellant has been allowed one pay scale up gradation from BPS-15 to BPS-16 vide entry in service book of the appellant . Copy of relevant page of service book of the appellant is attached as Annexure C.
4. That following, the appellant was paid pay and emoluments of BPS-16 w.e.f 01-07-2015 to 31-12-2015. Copy of Pay slip showing the receipt of pay and allowances of BPS-16 by the appellant is attached as Annexure D.
5. That the appellant was retired from service on 31-12-2015 vide order No. 16/126/Estt/18395-98/DG dated 09-12-2014. Copy of retirement order of the

appellant dated 09-12-2014 is attached as Annexure E.

6. That Respondent No 3 made an entry in service book of the appellant for the recovery of pay and allowances received by the appellant in BPS-16 on account of his up gradation from BPS-15 to BPS-16 which is against the law as well as notification of up-gradation dated 30-06-2015. Copy of relevant page of service book of the appellant is attached as **Annexure F**. Therefore, pension and commuted value of pension of the appellant has been calculated on the basic of pay and emoluments of BPS-15 which is against the law and Govt. Notification . The pension and the commuted value of the pension of the appellant should have been on the basis of pay and emoluments of BPS-16. As a result, the appellant made hectic correspondence with the department for redressal of his grievances but of no avail. Copy of correspondence and departmental representations are attached as **Annexure G**.

7. That prior to this, the appellant has filed writ petition No. 875-A/2018 before the Honourable Peshawar High Court, Abbottabad Bench, which was disposed of vide order dated 4-12-2018 with direction to the appellant to approach the proper forum i.e this Honourable Tribunal. Copy of order dated 4-12-18 passed by Honourable Peshawar High Court, Abbottabad Bench is annexed as Annexure "H".

Hence, the instant service appeal is filed inter-alia, on the following grounds; -

**GROUNDS:-**

- a) That period of LPR clear pending retirement is countable towards promotion, up-gradation and benefits under any law. Therefore, during the LPR, the Govt. of Khyber Pakhtunkhwa finance department regulation wing allowed one pay scale up gradation to the appellant and respondents' department acted upon the notification and

paid pay and allowances of BPS-16. Therefore, once benefits are granted as per law that can never be rescinded save as lawful justification. Hence, recovery of paid allowances to the appellant on account of up gradation is illegal. Hence finalization of pension and commutation on the basis of pay of BPS-15 is also against the law. Therefore, the appellant is entitled to have his pension finalized on the basis of pay and allowances of BPS-16.

- b) That it has been settled by law that the competent authorities are always bound to follow rules and regulations and not otherwise. Here, in this case, respondent No. 3 has acted contrary to finance department regulation wing notification dated 30-06-2015 which amounts to misconduct on his part.
- c) That pension and commutation has wrongly been calculated on the basis of pay and

allowances of BPS-15 instead of BPS-16 due to the mistaken view taken by the respondent No.3. Therefore, a huge financial loss has been caused to the appellant in terms of pay, pension and commuted value of pension. respondents' department with malafide intentions snatched morsel of bread from the mouth of the appellant as the appellant has no source of income except his monthly pension which is the only source of his bread and butter.

d) That there is no other prompt and efficacious remedy available to the appellant except the invocation of jurisdiction of this Honourable Tribunal.

e) That the other grounds shall be urged at the time of arguments with due leave of this Honourable Tribunal.

It is, therefore, humbly prayed that on acceptance of the instant service appeal, respondents may graciously

be directed to revise pension and commuted value of pension on the basis of pay and emoluments of BPS-16 and difference of pension and commutation may also be paid to the appellant. Any other relief which this Honourable Tribunal deem appropriate in the circumstances of the case may also be granted to the appellant.

*A Khan*

...APPELLANT

Through;

Dated: \_\_\_\_\_/2018

*Muhammad Arshad Khan Tanoli*

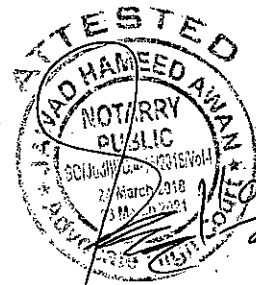
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

**VERIFICATION:-**

*Verified on oath that the contents of foregoing service appeal are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Court.*

*A Khan*

...APPELLANT



*24/12/18*



**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2018

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...APPELLANT

VERSUS

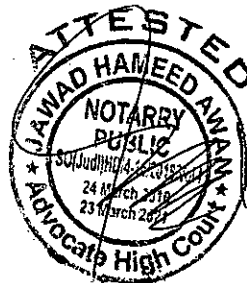
Government Of KPK & others.

...RESPONDENTS

**SERVICE APPEAL**

**AFFIDAVIT**

I, Arif Khan S/o Junior Scale Stenographer office of Director Agriculture  
District Haripur , do hereby solemnly affirm and declare that the contents of  
foregoing service appeal are true and correct to the best of my knowledge  
and belief and nothing has been concealed from this Honourable Court.



DEPONENT

24/12/2018

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2018

Arif Khan S/o Qaim Khan, Junior Scale Stenographer office of Director  
Agriculture District Haripur.

**...APPELLANT**

**VERSUS**

Government of KPK Through Secretary Agriculture & others.

**...RESPONDENTS**

**SERVICE APPEAL**

**ADDRESSES OF THE PARTIES**

Respectfully Sheweth:-

Addresses of the parties are as under:-

Arif Khan S/o Junior scale stenographer office of Director Agriculture  
District Haripur

**...APPELLANT**

**Versus**

1. Govt of KPK , through Secretary Agriculture, Livestock and  
cooperative Department KPK Peshawar.
2. Director General Agriculture extension KPK Peshawar.
3. District Director Agriculture District Haripur
4. District Accounts Officer District Haripur.

**...RESPONDENTS**

**...APPELLANT**

Through

Dated: \_\_\_\_\_/2018

(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

**Annex-A**

**P-12**

DIRECTORATE OF INFORMATION,  
GOVT. OF NWFP, PESHAWAR.

NO. INF/ESWP/7/24/3145-3251  
Dated Pesh: the 2/4/1989.

**OFFICE ORDER**

In pursuance of the orders contained in Govt. of

NWFP, Finance Department, Notification NO. FD/(FRG)4-1/89 dated

24.1.1989, the following stenographers of this Directorate in PPS-12

are hereby allowed (Selection Grade) PPS-15 equal to 33% of the total

thirteen (13) sanctioned posts of stenographers with effect from

24.1.1989.

1. Mr. Abdul Sattar

2. Mr. Arif Khan

3. Mr. Alcaim-Idaq

4. Mr. Jaffar Khan

-do-

DIANI: INT: Office Kohat.

DIANI: INT: Office A/Abad.

Head Office.

Assistant Director (Adm.)  
Per Director of Information,  
*J. J. J.*

Encl: NO. INF/ESWP/7/24/

Dated Pesh: the 4/4/1989.

Copy to:-

1. Director of Information.

2. Accountant General NWFP, Peshawar.

3. Asstt: Director Information, Kohat.

4. Asstt: Director Information, A/Abad.

5. All concerned.

6. Personal file of the officials.

7. Bill Clerk.

8. Office Order File.

9. File NO. 1/59.

High Court  
Adjacent to

Assistant Director (Adm.)  
Per Director of Information,  
GOVT. OF NWFP, PESHAWAR.

*J. J. J.*

7

51-9

A-XSNNH

P-13

# Annex-B



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT  
(REGULATION WING)**

Annex 'B'

Dated Peshawar, the 30-06-2015

~~Annex~~

## NOTIFICATION

FD/SO(FR)7-20/2015: The competent authority has been pleased to accord approval to the upgradation of pay scales of the following provincial government employees with effect from 01-07-

- a) Two pay scale upgradation will be allowed to all provincial government employees from BS-01 to BS-05.
- b) One pay scale upgradation will be allowed to all provincial government employees from BS-06 to BS-15
- c) Special Compensatory Allowance equal to difference of notional upgradation of BS-16 to BS-17 will be allowed to all provincial government employees in BS-16 in lieu of upgradation.
- d) Upgradation will be applicable to both pay and allowances with freezing limits and other conditions currently in vogue unless revised by the government.
- e) Pay fixation on upgradation will be applicable w.e.f. 01-07-2015 or 01-12-2015 on the option to be given by the concerned employee.
- f) All provincial government employees who have been upgraded en-block or individually in last five years starting from 01-07-2010 or have been granted special allowance / pay equal to 40 % or more of their normal pay shall not be entitled for the instant upgradation.

Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage next to the pay in the lower pay scale.

All the concerned Departments will amend their respective service rules to the same effect in the prescribed manner:—

The above upgradation scheme shall not be applicable to employees of Autonomous Bodies, Semi Autonomous Bodies and Public Sector Companies.

Explanatory note and subsidiary instructions on the subject will be issued separately.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

Attested  
Muhammad Arshad Khan Qaroli  
Advocate High Court  
Office No 33 Adjacent to  
Dist. Court Abbottabad

(For Use in Police Department only)

Annex "C"

Heirs,

P-15

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(1)

Verification Roll No. , dated received back

Left thumb - impression

Qualifications	Date	Qualifications	Date
English.		First Arts / Passed D. Com in 2 <sup>nd</sup> Division from Govt. Degree Col. Abbottabad / Board of Technical Education, Peshawar	
Pashtu			
Urdu		Pledership Examination Assistant Director, Information Harora Division, Abbottabad	
Plan - drawing		Training School Examination	
Finger print		Other Qualifications—	
Drill instructing			
Court duties			
Reserve duties			

*Arrested*

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Distt. 3rd Abbottabad

P-15  
③

P-16

	2	3	4	5	6	7	9
Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating State— (i) substantive appointment or (ii) whether service counts for pension under Art. 371 C S. R.	Pay in substantive Post	Additional pay for Officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature and designation of head of the office or of a gazetted officer
Steno Typist	Permanent	B-8 (370-16-514)	370.00	✓	—	18.6.83	R. N. (F.N.)
—	—	BPS 12 (750-40-1552)	750.00	✓	—	1-7-83	R. N.
—	—	—	790.00	✓	—	1-12-83	R. N.
—	—	—	830/-	✓	—	1-12-84	R. N.
—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—

Attested  
 Muhammad Arshad Khan Tariqi  
 Advocate High Court  
 Office No 33 Adjacent to  
 Jor Abbottabad

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

1. Name *Mr. Arif Khan* P-17

2. Race *Jadon*

3. Residence *Banda Dilzai, P/O Thangi, Teh: 7 Dist, Abbottabad.*

4. Father's Name and Residence *Qaim Khan*

5. Date of Birth by Christian era as nearly as can be ascertained *20-2-1959*

*(Twentieth February, A.H. + fifty nine)*

6. Exact height by measurement *5-6*

7. Personal marks for identification *Mole on left side face.*

8. Left hand Thumb and Finger impression of (non-gazetted) officer

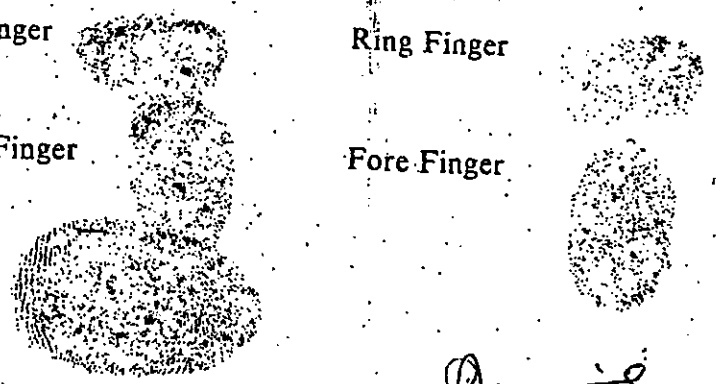
Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb



*Attested*  
*M. A. Khan*  
Advocate High Court  
Office No. 33 Adjacent to  
Dist. Court Abbottabad

9. Signature of Government Servant

*Arif Khan*

*Arif Khan*  
9.4.83

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

*[Signature]*  
Assistant Director of Information  
Hazara Division, Abbottabad  
9.4.83



D-119 (3)

1	2	3	4	5	6	7	9 Signature and designation of head of the office or other official in act of cert.
Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating State— (i) substantive appointment or (ii) whether service counts for pension under Art. 371 C S. R.	Pay in substantive Post	Additional pay for Officiating	Other emolument falling under the term "Pay"	Date of appointment	
Steno Typist	Permanent <del>Off/Temp</del>	B-8 (370-16-514)	370.00 ✓	—	—	9.4.83 (F.N.)	R. J. ...
—	—	BPS 12 (750-40-1550)	750.00 ✓	—	—	1-7-83	R. J. ...
—	—	—	790.00 ✓	—	—	1-12-83	R. J. ...
—	—	—	830.00 ✓	—	—	1-12-84	R. J. ...
<p>Alleged</p> <p>Arrested High Court Advocate High Court Office No 33 Adjacent to Dist. for ...</p>	—	—	—	—	—	—	—

9	Signature and designation of the head of the office or other appointing officer in attestation of columns 1 to 8
10	Date of termination of appointment or other appointment
11	Reason of termination (such as promotion or transfer etc.)
12	Signature of the head of office or other appointing officer
13	Nature of leave and duration for which leave is taken
14	Signature of the head of office or other appointing officer
15	Reference to any recorded punishment or censure, or reward or praise of the Government servant

Appointing officer (Type in NTS No 8 with approval of Impression) Hazara Divn: Abbottabad office  
 Order no: IMP/let: R/205/1726-30 dated: 9-5-83

Services verified from the other copies of the BPS for revised of period in the BPS  
 12 H.C. & 1-7-83 vide Finance Deptt. letter no: FD (SR-2) 1-67/82 dt: 24-8-83

Services verified from the other copies of the BPS  
 1-7-83 to 30-11-1983

Services verified from the other copies of the BPS  
 1-7-83 to 30-11-1983

Services verified from the other copies of the BPS  
 1-7-83 to 30-11-1983

Assistant Director Information Hazara Division, Abbottabad  
 M. J. Khan  
 Assistant Director Information Hazara Division, Abbottabad  
 M. J. Khan

Assistant Director Information Hazara Division, Abbottabad  
 M. J. Khan

Assistant Director Information Hazara Division, Abbottabad  
 M. J. Khan

Assistant Director Information Hazara Division, Abbottabad  
 M. J. Khan

Assistant Director Information Hazara Division, Abbottabad  
 M. J. Khan

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P-18  
 P-18  
 P-18

5 P-19

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, State— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	4 Pay in substantive Post	5 Additional pay for Officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature Government Servant
<p>Office of the Accountant General            N. P. P. Pochawar            Pay fixed in Bands Pay Scale 1988            of Rs 750-40-1550 B.G. No 12            with next increment on 1.12.88            d. s. s. Accountant General            N. P. P. P.</p>							
Steno Typist Permanent			870/-			1-12-83	[Signature]
Steno Typist Permanent			910/-			1-12-88	[Signature]
Steno typist			1178/-			1-7-87	[Signature]
Steno typist			1230/-			1-12-87	[Signature]

Signature of the head of the office

Advocate High Court  
 Office No. 33 Adjacent to  
 Dist. Bar Abhottabad

P-20

6

P-20

Date of appointment: \_\_\_\_\_  
 Signature of Government Servant: \_\_\_\_\_

Serial with a warning issued vide no. _____	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Name and duration of leave taken	Reference to any recorded punishment or reward or praise of the Government
Served with a warning issued vide no. 357/PP/INF dt: 16/4/87	[Signature]	[Signature]	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Served with a warning issued vide no. 2409/INF dt: 12/8/85
Served with a warning issued vide no. 3309/35/INF dt: 22/5/86	[Signature]	[Signature]	Government to which debitable	Served with a charge sheet issued vide no. 797/PP/INF dt: 30-7-87
[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad
Served with a charge sheet vide no. 613-15/PP/INF dt: 13-7-85	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad
Annual increment granted.	Fazal Rehman Khan Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	Services verified from the office copies of Estt. Pay Bills H.E. of 1-12-84 to 30-11-85
Annual increment granted.	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	Services verified from the office copies of Estt. Pay bills H.E. of 1-12-85 to 30-11-88
Pay revised of Pakl in BPS-12 at the stage of Rs. 1178/- PM vide Finance Deptt. order, Peshawar, circular No. PD (PRC) 1-1/87-XII, dt: 22-7-87.	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	Services verified from the office copies of Estt. Pay Bills H.E. of 1-7-87 to 30-11-1987
Annual increment granted.	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad	[Signature] Assistant Director Information Hazara Division Abbottabad

Muhammad Ishaq Khan Tanoli  
 Advocate High Court  
 Office No. 33 Adjacent to  
 Hazara Division Abbottabad

1	2	3	4	5	6	7
Stenographer	1282 1/2 pay	1-12-88	36 1/2 hours	1-7-88	1230 1/2 pay	34 1/2 hours
Stenographer	1378 1/2 pay	24-1-88	37 1/2 hours			
Stenographer	1449 1/2 pay	41 1/2 hours				
Stenographer	1478 1/2 pay	11-8-88				

RISPS-15 (165-71-2585)

RISPS-12 (970-5-2-2010)

APPROVED  
 [Signature]

Signature of head of the agency  
 [Signature]

P-21  
 P-21  
 P-21

P-22

8

P-23

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	LEAVE		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.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		

allowed n.c. of 1-7-88 vide Finance Deptt. circular No. PD (PR) 1-3/85, dt: 4-8-88.

Services verified from the office copies of Ptd. pay bills n.c. of 1-12-87 to 30-11-1988.

*[Signature]*  
Assistant Director Information

Hazara Division Abbottabad

Annual increment granted.

*[Signature]*  
Assistant Director Information

Hazara Division Abbottabad

*[Signature]*  
Assistant Director Information

Hazara Division Abbottabad

Granted Selection Grade BPS-15 n.c. of 24-1-1989 vide Director of Information, NHPP, O/A No. INF/Ptd. 7/64/3252-60 dated 26-4-1989.

*[Signature]*  
Assistant Director Information

Hazara Division, Abbottabad.

T/1425  
1575

Drawn amount of Pay & Allowance due to grant of Selection grade from BPS-12 to BPS-15 w.e.f.

30/11/89 Annual increments

24/1/89 to 01/4/89.  
Pay 312-78 ✓  
1/89 9-72 ✓  
H. rent 190-60  
Grnt 513-15

*[Signature]*  
Assistant Director Information

Hazara Division, Abbottabad.

Services verified from the office copies of Ptd. pay bills n.c. of 1-12-88 to 30-11-89.

*[Signature]*  
Arshad Khan Jangal  
Advocate High Court  
Office No. 33 Adjacent to  
Abbottabad

*[Signature]*  
Assistant Director Information

Hazara Division, Abbottabad.

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P-23

P-24

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, State— (i) substantive appointment or (ii) whether service counts for pension under Arc. 371, C. S. R.	4 Pay in substantive Post	5 Additional pay for Officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government Servant
<u>RBPS-15 (1165-71-2585)</u>							
Stenographer	Offg./Temp.	-	1520/-	43/-		1-12-92	A Khan
<u>RBPS-15 (1620-131-3585)</u>							
Stenographer	Offg./Temp.	-	2144/-			1-6-91	A Khan
Stenographer	Offg./Temp.	-	2275/-			1-12-91	A Khan
Stenographer	Offg./Temp.	-	2485/-			1-12-92	A Khan
Stenographer	Offg./Temp.	-	2537/-			1-12-93	

Office of the Accountant General  
 H.W.P. Peshawar  
 Pay Band in the Revised Pay Scale 1991  
 of Rs. 1620-131-3585 (15)  
 of Rs. 2144/-  
 with effect from 1-12-1991  
 With Min. Investment on 1-12-1991.

A. Mehta  
 Advocate High Court  
 Office No. 33 Adjacent to  
 District Court

*[Signature]*  
 Accountant General  
 H.W.P. Peshawar

P-24  
P-25  
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15	14	13	12	11	10	9
Reference to any recorded punishment or reward or praise of the Government servant	Signature of the head of the office or other attesting officer	Allocation of period of leave on average for four months for which leave salary is payable to another Government or other Government to which debitable	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
		Period of leave taken	Signature of the head of office or other attesting officer	Reason of termination (such as promotion or transfer or dismissal etc.)	Date of termination of appointment	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8

Signature of Government Servant  
Date

Office No 33 Adjacent to Advocate High Court Hazara Division, Abbottabad

Hazara Division, Abbottabad  
Assistant Director Information

Hazara Division, Abbottabad  
Assistant Director Information

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Hazara Division, Abbottabad  
Assistant Director Information

Services verified from office copies of pay bills  
P. e P-12-87 & 30-11-

Remission of BPS note PD NMPF  
Circular No. PD (PR) 1-1/89 dt. 11.8.91

Hazara Division, Abbottabad  
Assistant Director Information

Hazara Division, Abbottabad  
Assistant Director Information

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Assistant Director Information



Hamilton, Ohio  
 33 Adjacent  
 Advocate High Court  
 Child

*[Handwritten signature]*

1-28-87 ✓ 4/37/87 ✓ ✓ ✓

1-28-87 ✓ 386/2 ✓ ✓ ✓

1-28-85 ✓ 37837 ✓ ✓ ✓

1-28-86 ✓ 366/ ✓ ✓ ✓

1-6-89 ✓ 3428/ ✓ ✓ ✓

15 (9180-177-4845)

Signature  
 Designated  
 head of  
 Government  
 Service

7	6	5	3	2	1	
Date of appointment	Other employment falling under the term "pay"	Additional pay for Officiating	Pay in substantive Post	If Officiating, State— (i) substantive or (ii) appointment or (iii) whether service counts for pension under Art. 371.	Whether officiating or substantive or permanent or temporary	Name of Post

⑪  
 P. 25

*[Handwritten signature]*

P. 26

(12)

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9	10	11	12	13		14	15
				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 and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Signature of leave taker	Period to which Government debitable	Signature of the head of the office or other attesting officer	Reference to any record of punishment or censure, or reward or praise of the Government Servant
<i>[Signature]</i>	31/94	Review of services	<i>[Signature]</i>	<i>[Signature]</i>		<i>[Signature]</i>	Services verified from the Office Copies of Estt. Pay Bills w.c.f. 30-11-85 To 31-1-86
<i>[Signature]</i>		30/94 Annual increment	<i>[Signature]</i>	<i>[Signature]</i>		<i>[Signature]</i>	Services verified from the Office Copies of Estt. Pay Bills w.c.f. 1-1-85 To 30-11-85
<i>[Signature]</i>		30/95 Annual increment	<i>[Signature]</i>	<i>[Signature]</i>		<i>[Signature]</i>	Services verified from the Office Copies of Estt. Pay Bills w.c.f. 1-1-85 To 30-11-86
<i>[Signature]</i>		30/96 Annual increment	<i>[Signature]</i>	<i>[Signature]</i>		<i>[Signature]</i>	Services verified from the Office Copies of Estt. Pay Bills w.c.f. 1-1-86 To 30-11-87
<i>[Signature]</i>		30/97 Annual increment	<i>[Signature]</i>	<i>[Signature]</i>		<i>[Signature]</i>	Services verified from the Office Copies of Estt. Pay Bills w.c.f. 1-1-87 To 30-11-88

Office of the Assistant Director, Hazara Division, Abbottabad

P. 28 13 P. 27

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating, State— (i) substantive appointment or (ii) whether service counts for pension under Act 71.	Pay in substantive Post	Additional pay for Officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature
			B-15 (A180-177-4845)				
Stenotypist	off temp		4314/-			1-12-98	A. Khan
			4491/-			1-12-99	A. Khan
			4668/-			1-12-2000	A. Khan
			4668/-			12/01	A. Khan
			4668/-			12/01	A. Khan
			7525/-			1/02	A. Khan

Office of the Accountant General  
 Pay Band 2190-177-4855 (15)  
 Pay Band 23429/-  
 Pay Band 2190-177-4855 (15)  
 Pay Band 23429/-  
 Office of the Accountant General  
 Pay Band 2190-177-4855 (15)  
 Pay Band 23429/-  
 Office of the Accountant General  
 Pay Band 2190-177-4855 (15)  
 Pay Band 23429/-  
 Office of the Accountant General  
 Pay Band 2190-177-4855 (15)  
 Pay Band 23429/-

Advocate High Court  
 Office No 33 Adjacent to  
 Dist Court, Amritsar

(14)

8	9	10	11	12	13		14	15
					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 Government Servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any records punishment censure or reward or praise of the Government Servant
12-98	[Signature]	30/11/98	Increment	[Signature]			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-98 To 30-11-98
12-99	[Signature]	30/11/99	Increment	Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-99 To 30-11-99
12-2000	[Signature]	30/11/2000	Increment	Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2000 To 30-11-2000
7-01	[Signature]	30/11/01	Increment	Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 7-01 To 30-11-01
12-01	[Signature]	30/11/01	Increment	Assistant Director Information Hazara Division Abbottabad	Transferred to Distt: Information officer Haripur vide o/o no. 106/2001 dt: 28-8-2001. and relieved of duties w.e.f. 30-8-2001 (AM).		[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2001 To 30-11-2001
12-02	[Signature]	30/11/02	Increment	Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2002 To 30-11-2002
				Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2003 To 30-11-2003
				Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2004 To 30-11-2004
				Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2005 To 30-11-2005
				Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2006 To 30-11-2006
				Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2007 To 30-11-2007
				Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2008 To 30-11-2008
				Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2009 To 30-11-2009
				Assistant Director Information Hazara Division Abbottabad			[Signature]	Services verified from the Office Copies of Estt; Pay Bills w.c.f. 12-2010 To 30-11-2010

Mohammad Ayshad Khan Tanqil  
Advocate High Court  
Office No. 33 Adjacent to  
Jail Hazara

ASSISTANT DIRECTOR  
INFORMATION DEPARTMENT  
HARIPUR, NWFP

Assistant Director Information  
Hazara Division Abbottabad

P-20 (15) P-28

1	2	3	4	5	6	7	8	9	10	11
Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating, State— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive Post	Additional pay for Officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature and designation of the holder of the office or other appointing officer in illustration of columns 1 to 8	Date of termination of appointment	Reason of termination of appointment	
			15-15 (3285-265-11235)							
Steno Typist			7790/-			1/12/2003	A Khan			
			9055/-			1/12/2003	A Khan			
			8-15 (3780-305-12930)							
			9270/-			1/7/2005	A Khan			
			9575/-			1/12/2007	A Khan			
Shahid Ishaq Khan, Senior Advocate High Court, Office No. 33 Adjacent to Anbhotabad										

12051  
Office of the Accountant General  
N.W.F.P. Postmaster  
Pay Fixed in the revised Basic Pay scale 2005  
of Rs. 3280-305-12930  
at Rs. 9270/- as on 01/12/2008  
with 10% increment on 01/12/2008

(15)

M. Shah  
Pay Commission, Jammu & Kashmir

Subs  
inde  
man  
No. FD  
30-12-2003  
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D

Other information  
In writing  
Appointment  
Date  
Signature and  
Title of the  
acting or other  
officer  
Signature and  
Title of the  
acting officer  
in attestation  
of columns 1 to 8

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Signature and Title of the acting or other officer	Date of termination of the appointment or other officer	Reason of termination (such as promotion or other transfer, dismissal, etc.)	Signature of the head of the office or other officer	Nature of leave and pay on average for four months for which leave salary is payable to another Government	Allocation of period of leave on average	Signature of the head of the office or other acting officer	Reference to any recorded or punishment or censure, or reward, or praise of the Government Servant
--	---	--	--	--	--	---	--

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Office No 33 Adjunctive

30/11/2005 Annual increment	11	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Promotion	12	Promotion	[Signature]	Promotion	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]

30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]
30/11/2005 Annual increment	12	Annual increment	[Signature]	Annual increment	[Signature]	[Signature]	[Text]

21/9/05  
15/9/05  
30-11-05  
1781

12 Annual increment  
24/7/05  
10875  
21/9/05  
15/9/05  
30-11-05

12 Annual increment  
24/7/05  
10875

12 Annual increment  
24/7/05  
10875

12 Annual increment  
24/7/05  
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12 Annual increment  
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24/7/05  
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12 Annual increment  
24/7/05  
10875

12 Annual increment  
24/7/05  
10875

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17

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19.

(For use in Police and other similar Departments)

RECORD OF POSTINGS

District and Post	No. of District Order	Date	District and Post	No. of District Order	Date
			(A) Drawn Rupees 9500/- vide Diary No 99 dated T.W.R. 31/25/11/2011	As non Retiredable	22/11/2011 A.A.O.
			(B) Drawn Rs 9500/- vide dated 13/11/2011	as NEA	T.M. 6823

*Muhammad Arshad Khan Teroli*  
Advocate High Court  
Office No. 33 Adjacent to  
Distt Corah

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3

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

1. Name: Arif Khan

2. Race: Jadoon

3. Residence: Banda Dilzav P/O Jhangui Tehsil Distt ATD


4. Father's name and residence: Daim Khan


5. Date of birth by Christian era as nearly as can be ascertained: (20-2-1959)


6. Exact height by measurement: 5-6"


7. Personal marks for identification: Mole on left side face.

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

Little Finger 

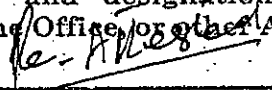
Ring Finger 

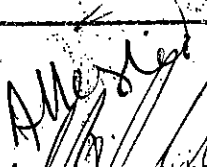
Middle Finger 

Fore Finger 

Thumb 

9. Signature of Government Servant: 

10. Signature and designation of the Head of the Office or other Attesting Officer.  District Director  
Agriculture Extension Deptt  
District Hanguir

  
Advocate High Court  
Case No. 23 Adjacent to  
Abbottabad



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1	2	3	4	5	6	7	10
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature and Designation of the head of the office or other officiating officer in execution of columns 1 to 7
Stenotypist			9880/-			1-12-06	A Khan
			11350/-			1-7-07	A Khan
			11700/-			1-12-07	A Khan
			14040/-			1-7-2008	A Khan
			14460/-			1-12-2008	A Khan
			14880/-			1-12-2008	
			15300/-			1-12-2010	A Khan

Hamid Ahmad Khan Jaroli  
 Advocate High Court  
 Office No. 23 Adjacent to  
 Dist. Bar Abbottabad

OFFICE OF THE ACCOUNTS OFFICER  
 PAY FIXED IN TERMS OF REVISED BASIC PAY SCALES  
 OF RS 4350/-  
 AT RS 71350/-  
 With Next Increment on  
 1-07-2007  
 1-12-2007

Accounts Officer  
 N.W.F.F. Peshawar

OFFICE OF THE ACCOUNTS OFFICER  
 PAY FIXED IN TERMS OF REVISED BASIC PAY SCALES  
 OF RS 5220/-  
 AT RS 14040/-  
 With Next Increment on  
 1-7-2008  
 1-12-2008

Accounts Officer  
 N.W.F.F. Peshawar

*Arshad Khan*  
 Advocate High Court  
 Office No 33 Adjacent to 5  
 Jinnah Park Abbottabad

20

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6  
 7  
 Date of appointment  
 Govt  
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Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government			
					Period			Government to which debitible
<i>Annual increment granted</i> 30-11-2006 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			<i>[Signature]</i>		Services verified from the Office Copies of Estt. Pay Bills w.e.f. 1-12-2005 to 30-11-2006 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			
<i>Revision of pay scale</i> vide notification No. F.D.(PRC) 1-1/2007 dated 20-7-2007 & pay fixed w.e.f. 1-7-2007 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			<i>[Signature]</i>		Services verified from the Office Copies of Estt. Pay Bills w.e.f. 1-12-2006 to 30-11-2007 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			
<i>Annual increment granted</i> 30-11-07 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			<i>[Signature]</i>		Services verified from the Office Copies of Estt. Pay Bills w.e.f. 1-12-2006 to 30-11-2007 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			
<i>Revision of pay scale</i> vide notification No. F.D.(PRC) 1-1/2008 dated 10-7-2008 & pay fixed w.e.f. 1-7-08 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			<i>[Signature]</i>		Services verified from the Office Copies of Estt. Pay Bills w.e.f. 1-12-2007 to 30-11-2008 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			
<i>Annual increment granted</i> 30-11-2008 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			<i>[Signature]</i>		Services verified from the Office Copies of Estt. Pay Bills w.e.f. 1-12-2007 to 30-11-2008 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			
<i>Annual increment granted</i> w.e.f. 30-11-2009 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			<i>[Signature]</i>		Services verified from the Office Copies of Estt. Pay Bills w.e.f. 1-12-2008 to 30-11-2009 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			
<i>Annual increment granted</i> w.e.f. 30-11-2010 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			<i>[Signature]</i>		Services verified from the Office Copies of Estt. Pay Bills w.e.f. 1-12-2009 to 30-11-2010 <i>[Signature]</i> Deputy Director Regional Information Officer Abbottabad			

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6

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1	2	3	4	5	6	7	8	9	10	11
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'pay'	Date of appointment				Reason of termination
Stenotypist BPS-15			25300/-			1-7-2011				
			26000/-			1-12-2011				
			26700/-			1-12-2012				
			27400/-			1-12-13				

Basic Pay Scales 2011  
Office of The Accountant General  
Khyber Pakhtun Khwa Peshawar  
Pay Fixed in R.B.S. 2011

of Rs. 8500 - 7000 - 15  
At Rs. 25300/- P.M.V.T.S. 1-12-2011  
With Next Increment on 1-12-2011

Masleh Ahmad  
Accounts Officer  
Pay Fixation Party K. Pakhtun Khwa

Ad. Judge High Court  
Office No. 23 Adjacent to  
Distt Bar Association

Date of termination or appointment  
Reason of termination

25300/15

du

26

1-12-2011 A Khan

1-12-2012 A Khan

1-12-13 A Khan

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20

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Name: Abbas Khan Izhar  
Address: Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbotabad

5

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 debit to another Government		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Period	Government to which debit to	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				Annual increment granted 30-11-2006 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad			
Revision of pay scale vide notification No. F.D.(PRC) 1-1/2007 dated 20-7-2007 & pay fixed w.e. 1-7-2007 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad				Services verified from the Office Copies of Estt. Pay Bills w.e. 1-12-2006 to 30-11-2007 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad			
Annual increment granted 30-11-07 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad				Services verified from the Office Copies of Estt. Pay Bills w.e. 1-12-2007 to 30-11-2007 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad			
Revision of pay scale vide Not. ficentia No. F.D.(PRC) 1-1/2008 dated 10-7-2008 & pay fixed w.e. 1-7-08 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad				Services verified from the Office Copies of Estt. Pay Bills w.e. 1-12-2007 to 30-11-2008 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad			
Annual increment granted 30-11-2008 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad				Services verified from the Office Copies of Estt. Pay Bills w.e. 1-12-2008 to 30-11-2008 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad			
Annual increment granted w.e. 6-3-2009 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad				Services verified from the Office Copies of Estt. Pay Bills w.e. 1-12-2008 to 30-11-2009 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad			
Annual increment granted w.e. 2-1-2010 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad				Services verified from the Office Copies of Estt. Pay Bills w.e. 1-12-2009 to 30-11-2010 <i>[Signature]</i> Deputy Director Regional Information Officer Abbotabad			

Vertical text on the left margin: *[Handwritten notes]*

P-3A

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1	2	3	4	5	6	7	8	9	10	11	
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "pay"	Date of appointment			Signature of the officiating officer in Form 1 to 8	Date of termination or appointment	Reason of termination
Stenotypist BPS-15			25300/-			1-7-2011			A Khan		
			26000/-			1-12-2011			A Khan		
			26700/-			1-12-2012			A Khan		
			27400/-			1-12-73			A Khan		

Basic Pay Scales 2011  
 Office of The Accountant General  
 Khyber Pakhtun Khawa Peshawar  
 Pay Fixed in R.B.P.S. 2011  
 of Rs. 8500/- to 29520/-  
 At Rs. 25300/-  
 With Next Increment on 1-12-2011

15

Account's Officer  
 Pay Fixation Party K. Pakhtun Khawa

25300/15

das

260

Advocate High Court  
 Office No 33 Adjacent to  
 Distt. Jail Abbottabad

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Muhammad Sherif Khan Tazoli  
 Advocate High Court  
 Office No 33 Adjacent to  
 Distt Bar Abbottabad

Date of appointment  
 Name and Designation of head of the office or other attesting officer in attestation of columns 1 to 8

10	11	12	13		14	15
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.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
			Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
			Period	Government to which debitable		

Review of pay scale & pay fixed w.e. 1-7-2011

Deputy Director  
 Regional Information Officer  
 Abbottabad

Two AS  
 07/12/12

Drawn a sum of Rs = 68000/- by 1st find  
 advance vide no D No 400 dt = 06/12/12

AAO

Service verified w.e. 6  
 1-12-2010 to 30-11-2011  
 of pay roll of this office

Deputy Director  
 Regional Information Officer  
 Abbottabad

Annual increment granted  
 w.e. 6 30-11-2011

Deputy Director  
 Regional Information Officer  
 Abbottabad

Annual increment granted  
 w.e. 6 30-11-2012

Deputy Director  
 Regional Information Officer  
 Abbottabad

Annual increment granted  
 w.e. 6 30-11-2013

Deputy Director  
 Regional Information Officer  
 Abbottabad

Service verified from the  
 office copies of Estt. pay  
 bill w.e. 1-12-13 to 30-11-14

Deputy Director  
 Regional Information Officer  
 Abbottabad

Transfer from Regional Information Officer Add to  
 Distt Director Agriculture, Haripur under the  
 Notification No 50 (OTM) 3400 1-31/2014  
 as per award

Deputy Director  
 Regional Information Officer  
 Abbottabad

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1	2	3	4	5	6	7
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "pa"	Date of appointment
steno Typest Grapher BPS-15			27400/-			11/7/2014
steno Typest BPS-15			28100/-			1/12/2014
36325/15						
steno Typest B.P.S-15 (10985-905-38135)		Revised Pay Scale 2015	36325			01/7/2015
			37230/0M			01/12/15

Advocate High Court  
Office No 33 Adjacent

Office Of The Asst. General  
Khyber Pakhtunkhwa Peshawar  
Pay Fixed In The R & S 2015  
Of Rs. 10985 340/17185  
At Rs. 36325  
With Next Increment On  
1.12.2015  
ACCOUNTS OFFICER  
Pay Fixation Party K Paktunkhwa  
Peshawar

DD  
HA



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Attested  
*[Signature]*  
Arshad Khan  
Advocate High Court  
Office No: 33 Adjacent to  
Distt. Court Haripur

(26)

6  
7  
Date of  
appointment  
Signature  
Government

9	10	11	12	13	14	15
Signature and Designation of the head of the office or other attesting officer in accordance of rules 1 to 8	Date of termination or appointment	Reason of termination such as resignation, discharge, etc.	Signature and Designation of the head of the office or other attesting officer	Leave Particulars of periods of leave or absence for which salary is debitable to Governmental accounts	Signature of the head of the office or other attesting officer	Remarks in any recorded punishment or censure or other orders of the Governmental Bureau.
<i>[Signature]</i> DD AGRI: HARIPUR			<i>[Signature]</i> District Director Agriculture Extension Deptt: District Haripur	Transfer from Regional Information office Abbottabad to o/o District Director Agriculture extension Deptt: Haripur vide Notification		
<p>Service period from 01/01/2014 to 31/12/2014</p> <p>5 133 31/12/15</p> <p>4/11/2015 LPR 365 day Mr. Arshad Khan stenotypist BPS-15 vide office order No. 16/126/Estt/18395</p> <p>DG dt: Peshawar 09/12/2014 LPR 01-01-2015 to 31/12/2015.</p> <p>6<sup>th</sup> scale Revised upgraded B.16 30/15 A/C DDO</p>						
<i>[Signature]</i> DD AGRI: HARIPUR						
<i>[Signature]</i> DD AGRI: HARIPUR						

*[Signature]*

*[Signature]*

*[Signature]*

District Director  
Agriculture Extension Deptt:  
District Haripur

Dept: Fox



41-A

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1	2	3	4	5	6	7	8	9	10	11	
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature and Designation of the head of the office or other officiating officer in the installation of columns 1 to 6				Date of termination of appointment
Revised entry due to upgraded of scale B.P.S - 15 B.P.S - 16 vide Govt. RPR NO FD/50 (FR) 7-20/2015 dt: 30-6-2015											
<del>B.P.S - 16</del> <del>6938 20-12-15</del>											
B.P.S - 16 upgradation (12910-1035-43960)							38785/-			01/7/2015	A. K. S.
B.P.S - 16 (12910-1035-43960)							39820/-			01/12/2015	A. K. S.

A. K. S.

District Director  
Agriculture Extension Deptt.  
District Haripur

Address  
Office No. 33 A  
Jlew Ter

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ANNEX-D

S#:1 P Sec:002 Month:November 2015  
HR6343 -DISTRICT DIRECTOR AGRICULT  
Pers #: 00109180 Buckle: DISTRICT DIRECTOR AGRICUL  
Name: ARIF KHAN NTN:  
STENO TYPIST GPF #:  
CNIC No.1310181646531 Old #:

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(6)

16 Active Temporary HR6343  
PAYS AND ALLOWANCES:  
0025-Leave Salary 38,785.00  
1000-House Rent Allowance 1,818.00  
1947-Medical Allow 15% (16-22) 2,869.00  
1948-Adhoc Allowance 2010@ 50% 7,650.00  
2148-15% Adhoc Relief All-2013 4,215.00  
2174-Adhoc Relief Allow-2014 2,810.00  
2199-Adhoc Relief Allow @10% 3,878.00

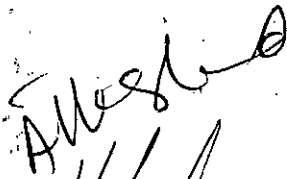
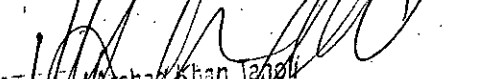
Gross Pay and Allowances 62,025.00

DEDUCTIONS:  
TF Payable 146.70 Deducted 306.00 TAX:(3609) 147.00  
GPF Balance 501,432.00 Subrc: 2,275.00  
6505-GPF Loan Principal Instal Bal: 0.00 1,850.00  
3501-Benevolent Fund 250.00  
3511-Addl Group Insurance 19.00  
3604-Group Insurance 173.00

Total Deductions 4,714.00

57,311.00

D.O.B LFP Quota: 4  
20.02.1959 MCB BANK LIMITED STAR BRANCH

  
  
Muhammad Arshad Khan Janji  
Advocate High Court  
Office No: 33 Adjacent to  
Lahore

P-42  
ANNEX-E

Annex "E"

DIRECTORATE GENERAL AGRICULTURE (EXTENSION)  
KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER

P-42

In terms of provision of Rule-14 of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981 sanctioned is hereby accorded to leave preparatory to retirement (365) days leave with effect from 1.1.2015 to 31.12.2015 in respect of Mr. Arif Khan, Jr. Scale Stenographer office of the District Director Agriculture, Haripur as admissible under the rule.

The above named official shall stand retired from service with effect from 31.12.2015 (AN).

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

No.16/126/Est/ 18395-98 /DG.

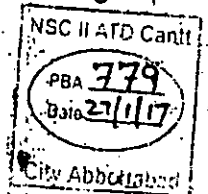
Dated Peshawar: the 09/12 /2014

Copy forwarded to:-

1. The District Director Agriculture, Haripur w/r to his letter No.1670 dated 14.11.2014.
2. The District Accounts Officer, Haripur.
3. Mr. Arif Khan, Jr. Scale Stenographer office of the District Director Agriculture, Haripur.

For information & necessary action.

4. File No.18/1/Est/ for record.



*Qayash Bahader*  
08/12/2014  
DIRECTOR GENERAL

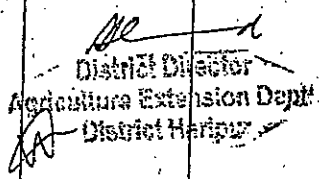
*Attested*  
*[Signature]*  
Advocate High Court  
Office No. 33 Adjacent to  
District Court

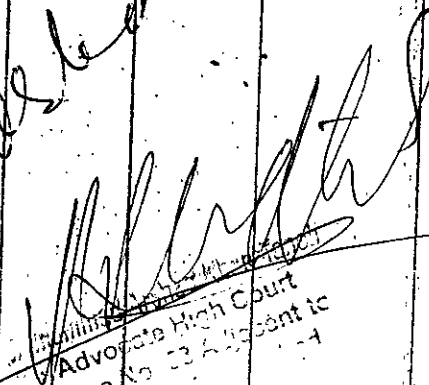
# Ahney F F

P-43 P-43

27

13

Signature of Government Servant.	Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8.	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure or praise of the Government Servant.
					Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		
						Period		
						ROP Rs. 26105/ur.e.f. of I to 2015 31-12-2015 (G.M) o/a pay & Allowances May be Recovered in Pension commutation.		
						 District Director Agriculture Extension Dept. District Manipur		

Attached  
  
 Advocate High Court  
 Office No. 334 opposite to

~~XXXXXX~~

P-44

(26)

11

Signature of Government Servant.	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or praise of the Government Servant.	
					Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
						Period			- Government to which debitable
560 5						Depth: Fixation			
						Pay on 30-6-2015 BPS=15 Rs. 28100 Pay Revised on -1-7-2015 BPS=15 Rs=36325 upgrade BPS=15 to BPS=16 Rs= 38725 vide notification No. FD/50(FR)7-20/2015 dt: Peshawar the 30-6-2015.			
	DD AGRI: HARIPUR					District Director Agriculture Extension Deptt. District Haripur			
	DD AGRI: HARIPUR	30/7/2015				District Director Agriculture Extension Deptt. District Haripur			
						District Director Agriculture Extension Deptt. District Haripur			
						Retired from Services on 31-12-2015 (A.N) vide Dg. App. Bx T.K.P.K. Peshawar No 16/126/ESST/18395-98 dt. 9.12.2014			
						District Director Agriculture Extension Deptt. District Haripur			

Advocate High Court  
 100 No. 23 Adjacent to  
 77-Abbottabad

Annex-9 P-45

16/126



GOVERNMENT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT  
(REGULATION WING)  
NO. KC/FD/SO(FR)/7-13/2012/6255  
Dated Peshawar, the 23-02-2017

P-45

To,

The Secretary to Govt; of Khyber Pakhtunkhwa  
Agriculture, Livestock, & Cooperative Department.

Subject: APPLICATION

Dear Sir,

I am directed to refer to the Agriculture Department letter No. SOE(AD)/VI-106/2014/Ext dated 26-01-2017 on the subject noted above and to state that the post of Junior Scale Stenographer has already been upgradation from BS-12 to BS-14 in the year 2011 therefore, the request for upgradation cannot be entertained being not covered under the rules.

DS  
24/2

Yours faithfully

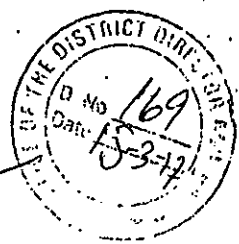
SECTION OFFICER (FR)

~~SOE~~  
24/2

Asst  
11  
24-2-17

SOE

1257  
24-2-17



SO(E)  
Distt

Attested  
Advocate High Court  
Office No 33 Adjacent  
Distt. Peshawar

Handwritten text at the bottom of the page, possibly a signature or initials, including the characters "Handwritten" and "6/12".

P-46



GOVERNMENT OF KHYBER PAKHTUNKHWA  
AGRICULTURE LIVESTOCK & COOPERATIVE  
DEPARTMENT

No.SOE(AD)VI-106/2015/Ext:  
Dated Peshawar the 17<sup>th</sup> Nov,2016

To  
The Section Officer (FR)  
Finance Department  
(Regulation Wing)

P-46

Subject:- APPLICATION

P-419

I am directed to refer to your letter No. KC/FD/SO(FR)/7-13/2005, dated 10/08/2016 on the above captioned subject. The Director General, Agriculture Extension vide letter No. 16/126/Estt/21403/DG, dated 16/11/2016 has informed that Mr. Arif Khan (Rtd) Junior Scale Stenographer O/O District Director Agriculture, Haripur was granted selection grade before 01/07/2010 vide Directorate of Information order No. INF/Estt/7/64/3248-3251, dated 26/04/2016, please. (copies attached for ready reference).

(DR. MIR AHMAD KHAN)  
SECTION OFFICER (ESTAB)

Copy forwarded to the

1. Director General Agriculture (Extension) w/r to letter referred to above.
2. PS to Secretary Agriculture Department.

SECTION OFFICER (ESTAB)  
Ph:091-9211938

DIRECTORATE GENERAL AGRICULTURE (EXTENSION) KHYBER  
PAKHTUNKHWA, PESHAWAR

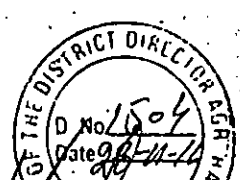
Endst. No.16/126/Estt/ 21989 /DG Dated Peshawar: the 24/11 /2016 ✓

Copy forwarded to Mr. Arif Khan (Rtd) Junior Scale Stenographer c/o District Director Agriculture, Haripur for information.

4.02  
SUPERINTENDENT (ESTT)  
HQ OFFICE

H.c  
ward over to  
csm

Amir Saeed



Mirza Muhammad Arif Khan (Rtd)  
Advocate High Court  
Office No 33 Adjacent to



Office No 33 Adjacent to  
 High Court  
 Chairman  
 National Council of Islamic Education  
 Islamabad

*Handwritten signature*

عالم خان پتوگر اور دیگر (چشمیت سٹیج) بریڈریٹ - 1983

*Handwritten signature*

- جناب ڈیپوٹی سیکریٹری چارج بریڈریٹ -
- جناب ڈیپوٹی سیکریٹری چارج عدالت چیمبر سٹیج بریڈریٹ -
- جناب ڈیپوٹی سیکریٹری چارج عدالت چیمبر سٹیج بریڈریٹ -
- جناب ڈیپوٹی سیکریٹری چارج عدالت چیمبر سٹیج بریڈریٹ -

عالم خان پتوگر اور دیگر (چشمیت سٹیج) بریڈریٹ -

الارض

تین نوایں ہوگی۔

۱۔ ۱۹۸۳ء میں ایف بی او کی طرف سے جاری شدہ آرڈر کو منسوخ کر دیا گیا اور اس کے بجائے ۱۹۸۳ء میں جاری شدہ آرڈر کو اپنا اثر قائم رکھا گیا۔  
 ۲۔ ۱۹۸۳ء میں ایف بی او کی طرف سے جاری شدہ آرڈر کو منسوخ کر دیا گیا اور اس کے بجائے ۱۹۸۳ء میں جاری شدہ آرڈر کو اپنا اثر قائم رکھا گیا۔  
 ۳۔ ۱۹۸۳ء میں ایف بی او کی طرف سے جاری شدہ آرڈر کو منسوخ کر دیا گیا اور اس کے بجائے ۱۹۸۳ء میں جاری شدہ آرڈر کو اپنا اثر قائم رکھا گیا۔

عالم خان

عزت جناب پتوگر اور دیگر (چشمیت سٹیج) بریڈریٹ -

**P-42**  
**P-47**

بخدمت جناب اکاؤنٹ جنرل خیبر پختونخواہ پشاور۔

P-48

جناب عالی

مؤدبانہ گزارش ہے کہ سائل نے مورخہ 09-04-1983 سے لیکر 31-12-2015 تک 32 سال سروس بطور شیئو گرافر خدمات سرانجام دی ہیں۔ دوران سروس مورخہ 24-01-1989 میں سائل کو BPS-12 سے BPS-15 میں سلیکشن گریڈ دیا گیا اس کے بعد سائل کو کسی قسم کی اپ گریڈیشن یا پروموشن یا کوئی خصوصی الاؤنس نہیں دیا گیا۔ لہذا اب اس کے بعد سائل 01-01-2015 سے 31-12-2015 تک ایک سال کی L.P.R پر تھا۔ اس دوران فنانس ڈیپارٹمنٹ نے مورخہ 30-06-2015 کے نوٹیفیکیشن نمبر FD/SO(FR)7-20-2015 کے تحت یکم جولائی 2015 سے دن سٹیپ اپ گریڈیشن دینے کا اعلان کیا تھا۔ لہذا ڈسٹرکٹ اکاؤنٹ آفیسر صاحب ہری پور نے اس نوٹیفیکیشن پر عمل کرتے ہوئے سائل کو BPS-15 سے BPS-16 میں ترقی دی گئی۔ جبکہ سائل کا ریٹائرمنٹ کا پینشن کیس ڈائریکٹر جنرل ایگریکلچر ایکٹیشن ڈیپارٹمنٹ خیبر پختونخواہ پشاور کو Countersigned کے لئے بھیجا گیا تو ڈی جی آفس میں Establishment Department نے اعتراض لگا کر پینشن کیس واپس کر دیا کہ سلیکشن گریڈ لینے والے کو دن سٹیپ اپ گریڈیشن نہیں مل سکتی۔

لہذا سائل آپ صاحبان سے پر زور اپیل کرتا ہے کہ سائل کو دن سٹیپ اپ گریڈیشن دی جائے کیونکہ سائل کے ساتھ بہت زیادہ نا انصافی ہے۔ لہذا سائل کو دن سٹیپ اپ گریڈیشن کا حق دیا جائے سائل آپ صاحبان کے لئے تاحیات دعا گور ہے گا۔

عین نوازش ہوگی۔

العارض

*(Signature)*

عارف خان شیوگرافر محکمہ زراعت (شعبہ توسیع) ہری پور۔

کاپی برائے اطلاع:-

- ۱۔ جناب ڈائریکٹر جنرل صاحب محکمہ زراعت شعبہ توسیع خیبر پختونخواہ پشاور۔
- ۲۔ جناب ڈسٹرکٹ ڈائریکٹر صاحب محکمہ زراعت شعبہ توسیع ضلع ہری پور۔
- ۳۔ جناب ڈسٹرکٹ اکاؤنٹ آفیسر صاحب ضلع ہری پور۔

*(Signature)*  
 Arshad Khan Tanoli  
 Advocate High Court  
 Office No: 33 Adjacent to

*(Signature)*  
 عارف خان شیوگرافر محکمہ زراعت (شعبہ توسیع) ہری پور۔

P-49

P-49



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(ESTABLISHMENT WING)

Dated Peshawar, the 04.07.2014

**NOTIFICATION**

No.S/O&M/E&AD/1-31/2014:- Consequent upon the right sizing of the Information Department Government of Khyber Pakhtunkhwa, the competent authority is pleased to adjust the following Officers/ officials of Information Department against the vacant positions as per details given below, with immediate effect in the public interest:-

S.#	NAME OF OFFICER	DESIGNATION	SCALE	ADJUSTED AGAINST THE VACANT POST
1	Mr. Muhammad Imran	Information Officer	BPS-17/18 Personal	Economist (BS-18), Excise & Taxation Deptt.
2	Mr. Muhammad Tayyab	Information Officer, Presently working against the post of Deputy Director, Abbottabad	BPS-17/18 Personal	Assistant Director (BS-17/18 Personal), Directorate of Transport, Transport Deptt.
3	Mr. Muhammad Haroon	Information Officer, Presently working against the post of PRO to Governor	BPS-17/18 Personal	Assistant Director (BS-17/18 Personal), Directorate of Transport, Transport Deptt.
4	Mr. Firdous Khan	Information Officer	BPS-17/18 Personal	Assistant Director (BS-17/18 Personal), Directorate of Transport, Transport Deptt.
5	Mr. Zamir Gul	Information Officer, Working as RIO, Mardan	BPS-17/18 Personal	Assistant Director (BS-17/18 Personal), Directorate of Transport, Transport Deptt.
6	Mr. Habibullah	Information Officer	BPS-17/18 Personal	Assistant Director (BS-17/18 Personal), Directorate of Transport, Transport Deptt.
7	Mr. Ghazi ur Rahman	Information Officer	BPS-17/18 Personal	Assistant Director (BS-17/18 Personal), Directorate of Transport, Transport Deptt.

U.S

*Attested*  
*[Signature]*  
Mr. Jamshed Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Distt. Peshawar

100

6-nd

P-50

P-30

S.#	NAME OF OFFICER	DESIGNATION	SCALE	ADJUSTED AGAINST THE VACANT POST
34	Mr. Naseer Muhammad	Senior Clerk	BPS-14	Senior Clerk (BS-14), Directorate of Sports, Sports Deptt.
35	Mr. Said-ul-Abbar	Senior Clerk	BPS-14	Jr. Scale Stenographer (BS-14), Office of the Chief Engineer Center C&W Department.
36	Mr. Fateh Khan	Senior Clerk	BPS-14	Senior Clerk (BS-14), Law Deptt.
37	Mr. Faizuddin	Senior Clerk	BPS-14	Senior Clerk (BS-14), PHSA, Health Deptt.
38	Mr. Fazla Ayan	Senior Clerk	BPS-14	Senior Clerk (BS-14), Office District OFWM, Swabi
39	Mr. Mahmood Riaz	Senior Clerk	BPS-14	Senior Clerk (BS-14), Directorate of Sports, Sports Deptt.
40	Mr. Arif Khan	Stenographer	BPS-14	Stenographer (BS-14), Office of the DDA, Hainpur, Directorate General Agriculture Extension, Agriculture Deptt.
41	Mrs. Nasreen Khalid	Stenographer	BPS-14	Stenographer (BS-14), PFI, Environment Deptt.
42	Mr. Sabirullah	Stenographer	BPS-14	Stenographer (BS-14), Public Safety, Commission Baran, Home Deptt.
43	Mr. Shah Jehan	Stenographer	BPS-14	Stenographer (BS-14), Office of the DDA, D. Khan, Directorate General Agriculture Extension, Agriculture Deptt.
44	Mr. Faqir Hussain	Stenographer	BPS-14	Stenographer (BS-14), Office of the DDA, Malakand, Directorate General Agriculture Extension, Agriculture Deptt.
45	Ms. Shahnaz Akhtar	Stenographer	BPS-14	Stenographer (BS-14), PFI, Environment Deptt.
46	Mr. Muhammad	Stenographer	BPS-14	Stenographer (BS-14),

*[Handwritten signature]*

*[Handwritten signature]*  
Advocate High Court  
Office No. 33 Adjacent to  
Dist. Bar Association

P-51

S.#	NAME OF OFFICER	DESIGNATION	SCALE	ADJUSTED AGAINST THE VACANT POST
103	Mr. Muhammad Tayyob	Naib Qasid	BPS-01	Naib Qasid (BS-1), PHSA, Health Deptt.


2. All the above officers/ officials are directed to report to their places of adjustment in the departments mentioned above within 07 days, positively.

CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

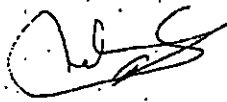
Encls. No. & date even.

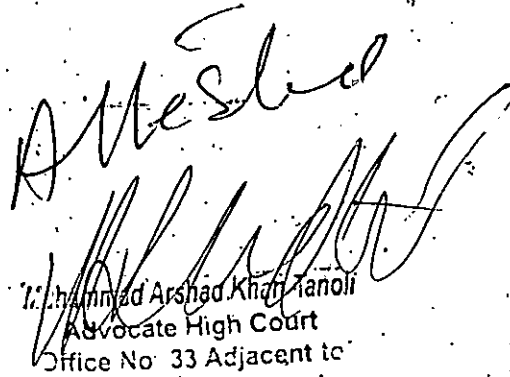
A copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa
3. All Divisional Commissioners in Khyber Pakhtunkhwa.
4. All Deputy Commissioners in Khyber Pakhtunkhwa.
5. The Senior Member Board of Revenue, Khyber Pakhtunkhwa
6. Officer/ Official concerned

  
SECTION OFFICER (O&M)

*H/C.R.*  
*Put it in your record please*  
*Ch. the file of P&T/MS/Pr*  
*AK*  
*11/7/2014*



  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to

P-52

In respect of,

The District Director,  
Agriculture Extension Departmentt,  
Haripur.

Subject: "Application under Right to Information Act for issuance of copies of following documents;

- ✓ 1. Copy of adjustment/transfer order of the applicant from the office of Regional Information Office. Abbottabad to office of District Director, Agriculture Extension Department Haripur.
- ✓ 2. Copy of Notification of promotion No. FD/SO(FR)7-20/2015 dated Peshawar 30-06-2015.
- ✓ 3. Copy of order/notification of the demotion/reversion/degradation of post from BPS\_16 to BPS-15 of the applicant"
- ✓ 4. Copy of Order/notification of Recovery of pay/ROP Rs. 26105 w.e.f. 01-07-2015 to 31-12-2015.
- ✓ 5. Copy of the application of the Applicant to the Director General Agriculture (Extension) KPK, Peshawar, in this regard.
- ✓ 6. Copy of order on said application.

Respected Sir,

Most respectfully stated that the applicant had served in the office of your lordship till his retirement i.e. 31-12-2015. The applicant was promoted vide Notification dated 30-06-2015 of the Government of KPK in BPS-16. But the applicant was strangely demoted/degraded without mentioning any rhyme & reason and without issuing any formal letter. Later on, the department also illegally sought recovery from the applicant. The act of demotion/degradation of post accompanied with recovery of pay is merely illegal but in essence void. The applicant requires above-mentioned documents for further necessary action. It is therefore most humbly prayed that the copies of Above-mentioned documents/record may kindly be provided/issued to the petitioner under the Right to information acts respectively for further necessary action & oblige.

Dated: 10-07-2018

*Arif Khan*  
(PETITIONER)

Arif Khan s/o Qaim Khan  
r/o Vilage Banda Dilazak, P.O. Jhangi,,  
Tehsil & district Abbottabad.  
Mob # 0322-5272499

*Rd*  
*M. Qasim*

11-07-2018  
Assistant BPS-16  
District Director Agriculture,  
Extension Deptt Haripur

*Arif Khan*  
*Arif Khan*  
Arif Khan  
District Director Agriculture,  
Extension Deptt Haripur

P-53

S#:1

P Sec:002 Month:October 2015

HR6343 -D.O(Agriculture) Haripur

Pers #: 00109180 Buckle:

DISTRICT DIRECTOR AGRICUL

Name: ARIF KHAN

NTN:

STENO TYPIST

GPF #:

CNIC No.1310181646531

Old #:

GPF Interest Applied

16 Active Temporary

HR6343

PAYS AND ALLOWANCES:

0001-Basic Pay

0.00

0025-Leave Salary

38,785.00

1000-House Rent Allowance

1,818.00

1210-Convey Allowance 2005

0.00

1947-Medical Allow 15% (16-22)

2,869.00

1948-Adhoc Allowance 2010@ 50%

7,650.00

2148-15% Adhoc Relief All-2013

4,215.00

2174-Adhoc Relief Allow-2014

2,810.00

2199-Adhoc Relief Allow @10%

3,878.00

Gross Pay and Allowances

75,006.00

DEDUCTIONS:

IT Payable 316.56 Deducted 159.00 TAX:(3609) 159.00

GPF Balance 497,307.00

Subrc: 2,275.00

6505-GPF Loan Principal Instal Bal: 1,850.00 1,890.00

3501-Benevolent Fund

250.00

3511-Addl Group Insurance

19.00

3604-Group Insurance

173.00

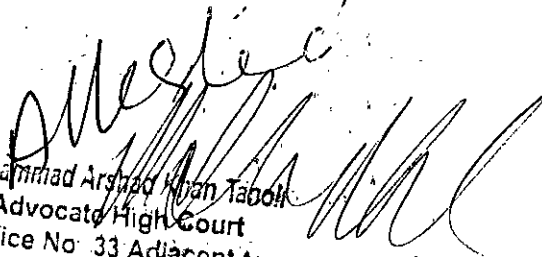
Total Deductions

4,766.00

70,240.00

D.O.B LFP Quota: 4

20.02.1959 MCB BANK LIMITED STAR BRANCH

  
Muhammad Arshad Khan Taboli  
Advocate High Court  
Office No: 33 Adjacent to  
Distt. Bar Association





GOVERNMENT OF PAKISTAN  
 ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA  
 DISTRICT  
 PAYROLL SYSTEM

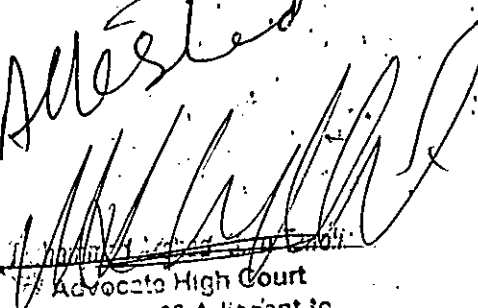
PAYMENT ADVICE

P-54

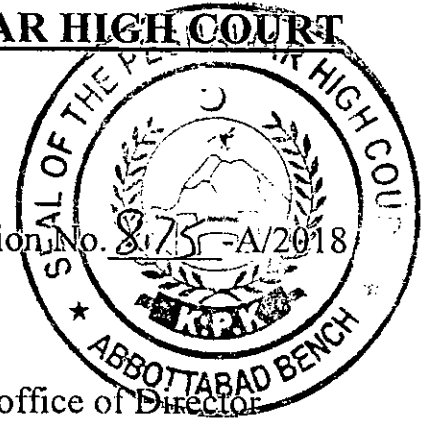
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SOFT COPY OF THIS  
 DISTRICT DIRECTOR AGRICULTURE  
 DISTRICT DIRECTOR AGRICULTURE

EPS		DEPTT CODE	
			Rs 634
			820.00
			818.00
			849.00
			650.00
			213.00
			2810.00
			993.00
			169.00
			147.00
			275.00
			220.00
			17.00
			173.00
NET AMOUNT PAYABLE			1,364.00
QUALIFYING YRS	SERVICE MON		50,300.00

*Amended*  
  
 Advocate High Court  
 Office No 33 Adjacent to  
 Distt. Dir. Abbottabad

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT**  
**ABBOTTABAD BENCH**



Writ Petition No. 8175-A/2018

Arif Khan S/o Qaim Khan Junior Scale Stenographer office of Director  
Agriculture District Haripur.

**...PETITIONER**

**VERSUS**

1. Govt of KPK, through Secretary Agriculture, Livestock and Cooperative Department KPK Peshawar.
2. Director General Agriculture Extension KPK Peshawar.
3. District Director Agriculture District Haripur
4. District Accounts Officer District Haripur.

**RESPONDENTS**

**Certified to be True Copy**  
**EXAMINER**  
**10 DEC 2018**  
Peshawar High Court Ad. Bench  
Authorized Under Se: 75 Evid Ordns.

WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN 1973 FOR DECLARATION TO THE  
EFFECT THAT THE PETITIONER WAS SERVING  
AS JUNIOR SCALE STENOGRAPHER IN BPS-15  
AND AS PER NOTIFICATION OF GOVT OF KPK  
FINACAE DEPARTMENT REGULATION WING  
DATED 30-06-2015, THE PETITIONER WAS  
GRANTED UP GRADATION FROM BPS-15 TO BPS-  
16 W.E.F 01-07-2015 VIDE UPGRADATION

no: 407 S  
02/05/18

**FILED TODAY**

**ADDITIONAL REGISTRAR**  
**PESHAWAR HIGH COURT**  
**ABBOTTABAD BENCH**

02/05/18

NOTIFICATION DATED 30-06-2015. THE PETITIONER HAS BEEN RETIRED FROM SERVICE ON 31-12-2015 VIDE ORDER DATED 19-12-2014. THE PETITIONER'S PENSION AND COMMUTED VALUE OF PENSION HAS BEEN FINALIZED ON PAY AND EMOLUMENTS OF BPS-15 INSTEAD OF BPS-16 AT THE TIME OF FINALIZATION OF PENSION AND COMMUTED VALUE OF PENSION, WHICH IS PERVERSE DISCRIMINATORY AGAINST THE LAW AS WELL AS AGAINST THE NOTIFICATION DATED 30-06-2015. HENCE, THE PETITIONER IS ELIGIBLE TO HAVE HIS PENSION / COMMUTED VALUE OF PENSION ON THE BASIS OF PAY AND EMOLUMENTS OF BPS-16.

Certified to be True Copy  
EXAMINER  
10 DEC 2018  
Peshawar High Court Atd. Bench  
Authorized Under Se: 75 Evid Ordns.

PRAYER: ON ACCEPTANCE OF THE INSTANT WRIT PETITION, RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO REVISE PENSION AND COMMUTED VALUE OF PENSION ON THE BASIS OF PAY AND EMOLUMENTS OF BPS-16 AND DIFFERENCE OF PENSION AND COMMUTATION MAY ALSO BE PAID TO THE PETITIONER. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM APPROPRIATE IN

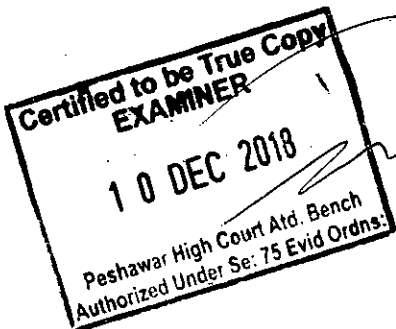
FILED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH

602/00/10

THE CIRCUMSTANCES OF THE CASE MAY ALSO  
BE GRANTED TO THE PETITIONER.

Respectfully Sheweth,

1. That petitioner served as junior stenographer and was allowed selection grade from BPS 12 to BPS 15 on 26-04-1989. Copy of letter dated 26-04-1989 showing selection grade of the appellant from BPS-12 to BPS -15 is attached as **Annexure A**.
2. That Govt of Khyber Pakhtunkhuwa finance department regulation wing allowed one pay scale up gradation from BPS-15 to BPS-16 w.e.f 01-07-2015 vide notification dated 30-06-2015. Copy of notification dated 30-06-2015 is attached as **Annexure B**.
3. That as per the said up gradation notification, the petitioner has been allowed one pay scale up gradation from BPS-15 to BPS-16 vide entry in service book of the petitioner . Copy of relevant page of service book of the petitioner is attached as **Annexure C**.
4. That following, the petitioner was paid pay and emoluments of BPS-16 w.e.f 01-07-2015 to 31-12-2015.



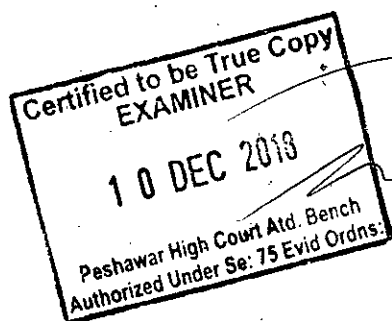
FILED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH

102/05/10

Copy of Pay slip showing the receipt of pay and allowances of BPS-16 by the petitioner is attached as **Annexure D**.

5. That the petitioner was retired from service on 31-12-2015 vide order No. 16/126/Estt/18395-98/DG dated 09-12-2014. Copy of retirement order of the petitioner dated 09-12-2014 is attached as **Annexure E**.

6. That Respondent No 3 made an entry in service book of the petitioner for the recovery of pay and allowances received by the petitioner in BPS-16 on account of his up gradation from BPS-15 to BPS-16 which is against the law as well as notification of up-gradation dated 30-06-2015. Copy of relevant page of service book of the petitioner is attached as **Annexure F**. Therefore, pension and commuted value of pension of the petitioner has been calculated on the basic of pay and emoluments of BPS-15 which is against the law and Govt. Notification . The pension and the commuted value of the pension of the petitioner should have been on the basis of pay and emoluments of BPS-16. As a result, the petitioner made hectic correspondence with the department for redressal of his grievances but of no avail. Copy of correspondence and departmental representations are attached as



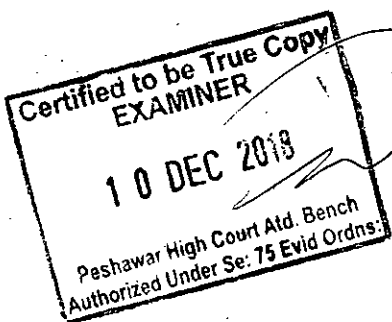
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH

12/08/19

Annexure G. Hence, the instant writ petition is filed inter alia on the following grounds.

GROUND:-

- a) That period of LPR clear pending retirement is countable towards promotion, up-gradation and benefits under any law. Therefore, during the LPR, the Govt. of Khyber Pakhtunkhwa finance department regulation wing allowed one pay scale up gradation to the petitioner and respondents' department acted upon the notification and paid pay and allowances of BPS-16. Therefore, once benefits are granted as per law that can never be rescinded save as lawful justification. Hence, recovery of paid allowances to the petitioner on account of up gradation is illegal. Hence finalization of pension and commutation on the basis of pay of BPS-15 is also against the law. Therefore, the petitioner is entitled to have his pension finalized on the basis of pay and allowances of BPS-16.
- b) That it has been settled by law that the competent authorities are always bound to follow rules and



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ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH

62/08/15

regulations and not otherwise. Here, in this case, respondent No. 3 has acted contrary to finance department regulation wing notification dated 30-06-2015 which amounts to misconduct on his part.

c) That pension and commutation has wrongly been calculated on the basis of pay and allowances of BPS-15 instead of BPS-16 due to the mistaken view taken by the respondent No.3. Therefore, a huge financial loss has been caused to the petitioner in terms of pay, pension and commuted value of pension. respondents' department with malafide intentions snatched morsel of bread from the mouth of the petitioner as the petitioner has no source of income except his monthly pension which is the only source of his bread and butter.

Certified to be True Copy  
EXAMINER  
10 DEC 2013  
Peshawar High Court Atd. Bench  
Authorized Under Se: 75 Evid Ordns:

d) That there is no other prompt and efficacious remedy available to the petitioner except the invocation of constitutional jurisdiction of this honourable court.

FILED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH

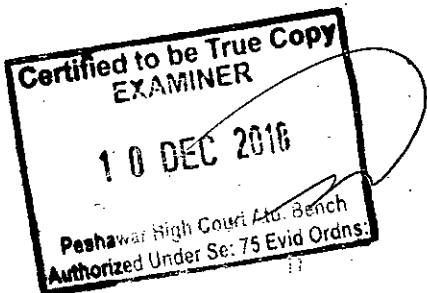
02/08/10

e) That as per law, necessary notices have been served upon the respondents through registered

mail. Copy of notice and registered receipts are attached as Annexure H.

- f) That court fee stamp paper worth Rs. 500/- is affixed.

It is, therefore, humbly prayed that on acceptance of the instant writ petition, respondents may graciously be directed to revise pension and commuted value of pension on the basis of pay and emoluments of BPS-16 and difference of pension and commutation may also be paid to the petitioner. Any other relief which this Honourable Court deem appropriate in the circumstances of the case may also be granted to the petitioner.



Dated: \_\_\_\_\_/2018

*A Khan*  
...PETITIONER

Through;

*Muhammad Arshad Khan Tanoli*  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

**VERIFICATION:-**

*Verified on oath that the contents of foregoing writ petition are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Court.*

*A Khan*  
...PETITIONER

FILED TODAY  
ADDITIONAL REGISTRAR  
PESHAWAR HIGH COURT  
ABBOTTABAD BENCH

12/02/18



P-62

BEFORE THE HONOURABLE PESHAWAR HIGH COURT

ABBOTTABAD BENCH

W.P No. 875 -A/2018

Arif Khan S/o Junior scale stenographer office of Director Agriculture  
District Haripur.

...PETITIONERS

VERSUS

Government Of KPK & others.

...RESPONDENTS

AFFIDAVIT

I, Arif Khan S/o Junior Scale Stenographer office of Director Agriculture  
District Haripur , do hereby solemnly affirm and declare that the contents of  
foregoing writ petition are true and correct to the best of my knowledge and  
belief and nothing has been concealed from this Honourable Court.

Certified to be True Copy  
EXAMINER  
10 DEC 2018  
Peshawar High Court Atd. Bench  
Authorized Under Se: 75 Evid. Ordns.

13/01-8764651-3

*Arif Khan*  
DEPONENT

1707/484

484

*Arif Khan S/o J. Scale Stenographer August 18*  
*ATD*

*ATD*  
7/01/8

ADDITIONAL REGISTRAR  
PESHAWAR  
107/09/10

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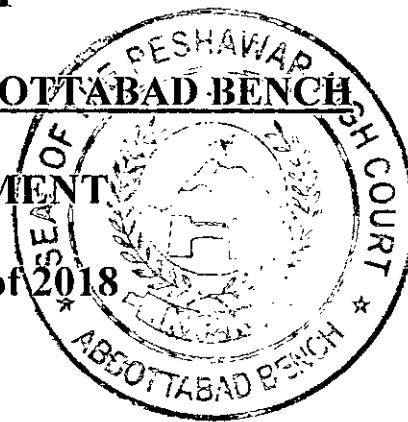
**JUDGMENT SHEET**

**PESHAWAR HIGH COURT, ABBOTTABAD BENCH**

**JUDICIAL DEPARTMENT**

**Writ Petition No.875-A of 2018**

**JUDGMENT**



*Date of hearing.....04.12.2018.....*

*Petitioner(s) ...(Arif Khan) by Mr. Muhammad Arshad Khan  
Tanoli, Advocate.....*

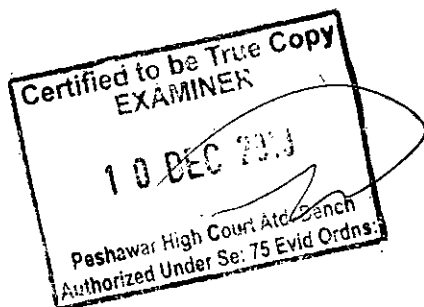
*Respondent(s)...(Government of KPK, through, Secretary  
Agriculture, Livestock & Cooperative  
Department, Peshawar etc) by Raja  
Muhammad Zubair, Additional Advocate  
General .....*

\*\*\*\*\*

**SYED MUHAMMAD ATTIQUE SHAH, J.-**

Petitioner through the instant writ petition has approached this Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, with the following prayer:-

*“It is, therefore, humbly prayed that on acceptance of the instant writ petition, respondents may graciously be directed to revise pension and commuted value of pension on the basis of pay and emoluments of BPS-16 and difference of pension and commutation may also be paid to*



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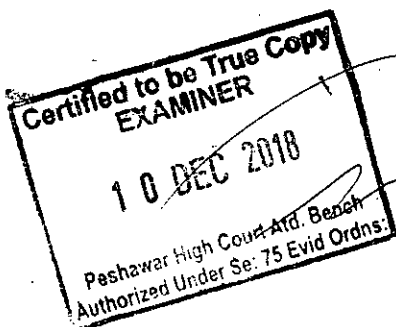
*the petitioner. Any other relief which this Honourable Court deem appropriate in the circumstances of the case may also be granted to the petitioner."*

2. In essence, the grievance of the petitioner is that the respondents may be directed to revise pension and commuted value of pension on the basis of pay and emoluments of BPS-16 and difference thereof be paid to him.

3. Arguments heard. Record perused.

4. Perusal of the record reveals that the question agitated by the petitioner in the present petition under Article 199 of the Constitution of Islamic Republic of Pakistan directly relates to the terms and conditions of his service, which is not amenable to the writ jurisdiction of this Court under Article 199 of the Constitution in view of the bar contained in Article 212 of the Constitution of 1973. Reliance is placed on case titled '*Pir Muhammad Vs. Government of Balushistan through Chief Secretary and others*' (2007 SCMR 54).

5. Therefore, in the peculiar facts and circumstances of the present writ petition, this Court



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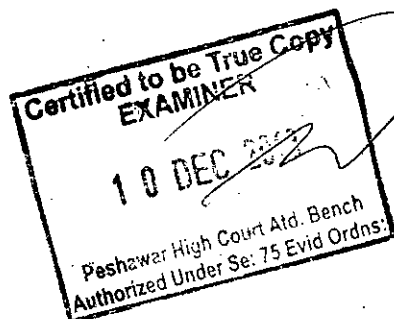
the present writ petition is dismissed. However, the petitioner is at liberty to approach the competent forum available to him under the law, if so advised.

Dt.04.12.2018

Sd Judge  
Sd Judge.

M.Saleem/\*

*(DB) Mr. Justice Lal Jan Khattak and Mr. Justice Syed Muhammad Attique Shah*



کورٹ فیس

## وکالت نامہ

Service Tribunal KPK Peshawar بعدالت

Arif Khan نام Court of KPK etc عنوان:

Appellant/Petitioner منجانب:

Service Appeal نوعیت مقدمہ:

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to

M. Arshad Khan Tanoli

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختمہ پرداختہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برادر

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تا کہ سند رہے۔

المترقوم:

بمقام:

Arshad Khan Tanoli

Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, CAMP COURT  
ABBOTTABAD

Appeal No.469/2019

Arif Khan s/o Qasim Khan  
Ex-Junior Scale Stenographer o/o  
District Director Agriculture, Haripur

APPELLANT

VERSUS

1- Government of Khyber Pakhtunkhwa,  
Through Secretary Agriculture Livestock & Cooperative  
Department Khyber Pakhtunkhwa Peshawar.

2- Director General, Agriculture (Extension)  
Khyber Pakhtunkhwa, Peshawar.

3- District Director Agriculture, Haripur.

4- District Accounts Officer Haripur

RESPONDENTS

PRELIMINARY OBJECTIONS

- 1- That the appeal is not maintainable in its present form and liable to be dismissed.
- 2- That the appellant has no cause of action to file the instant appeal.
- 3- That the appellant has no locus standi to file the instant appeal.
- 4- That the appellant has not come to this Hon'ble Court with clean hands.
- 5- That the present appeal is based on mollified intension.
- 6- That the appellant has deliberately concealed the important facts from this Honorable Court.
- 7- The appellant has already been retired from Service on Superannuation.
- 8- That the appeal is bad due to miss joinder / of necessary parties.
- 9- That the appeal is time barred.

PARA-WISE COMMENTS ON BEHALF OF RESPONDENTS NO.1, 2 & 3

Para-1 This Para is not related with the Respondents as the Ex-Official did not served in the Respondent Department at the time of Selection grade granted to the appellant.

Para-2 Correct to the extent that the Government of Khyber Pakhtunkhwa Finance Department allowed one pay scale up-gradation to all provincial Government employees from BS-06 to BS-15 with the condition that all Provincial Government employees who have been upgraded en-block or individually in the last five years starting from 01.07.2010 or granted special allowance/pay equal to 40% or more of their normal pay shall not be entitled for the instant up-gradation vide Notification No FD/SO(FR)7-20/2015 dated 30.06.2015 (Annex-A). The post of Junior Scale Stenographer before the above up-gradation as already been upgraded from BS-12 to BS-14, vide the Government of Khyber Pakhtunkhwa Finance Department Regulation wing Notification No FD / SO (FR) 10-22/2012 dated 19.06.2012 (Annex-B). The Director Information Khyber Pakhtunkhwa Peshawar has already been allowed Selection Grade BS-15 to the appellant vide office order No Inf/7/64/3245-3251 dated 26.04.1989 (Annex-C).

Para-3 Incorrect. The competent authority has not issued proper order of up-gradation of the appellant from BS-15 to BS-16.

Para-5 Correct to the extent that the appellant was retired from service on Superannuation with effect from 31.12.2015 (AN).

Para-6 Correct to the extent that the Respondent no 3 made entry in Service Book of appellant for the recovery of pay and allowances received by the appellant in BS-16 (illegally) on account of his up-gradation from BS-15 to BS-16 on the ground / comments given in Para-2 above and the competent authority rejected the request for up-gradation cannot be entertained being not covered under the rule vide Finance Department Government of Khyber Pakhtunkhwa Regulation Wing letter No KC/FD/SO(FR)/7-13/12/6255 dated 23.02.2017 (Annex-D).

Para-7 Correct.

#### GROUNDS

Para-a Incorrect. Detail comments given in Para-2 above. Beside the above appellant is not entitled to draw pension on the basis of pay and allowances of BS-16.


Para-b Incorrect. Detail comments given in para-6 above.


Para-c Incorrect. The pension and commutation correctly been calculated on the basis of pay and allowances of BPS-15 and no Financial loss has been caused to the appellant and terms of pay, pension and commuted value of pension.

Para-d This Para is not related with the Respondent, hence no comments.

Para-e No comments hence denied.

It is therefore humbly prayed that on acceptance of the above Para wise reply/comments, the appeal of the appellant may kindly be dismissed.

  
SECRETARY THROUGH GOVT. OF KHYBER PAKHTUNKHWA  
AGRICULTURE LIVESTOCK & COOPERATIVE  
DEPARTMENT PESHAWAR

  
DIRECTOR GENERAL,  
AGRICULTURE (EXTENSION)  
KHYBER PAKHTUNKHWA PESHAWAR

  
DISTRICT DIRECTOR AGRICULTURE  
HARIPUR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, CAMP  
COURT ABBOTTABAD

Appeal No.469/2019

Arif Khan s/o Qasim Khan  
Ex-Junior Scale Stenographer o/o  
District Director Agriculture, Haripur

APPELLANT

VERSUS

- 1- Government of Khyber Pakhtunkhwa,  
Through Secretary Agriculture Livestock & Cooperative  
Department Khyber Pakhtunkhwa Peshawar.
- 2- Director General, Agriculture (Extension)  
Khyber Pakhtunkhwa, Peshawar.
- 3- District Director Agriculture, Haripur.
- 4- District Accounts Officer Haripur

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.

  
SECRETARY THROUGH GOVT. OF KHYBER PAKHTUNKHWA  
AGRICULTURE LIVESTOCK & COOPERATIVE  
DEPARTMENT PESHAWAR

  
DIRECTOR GENERAL,  
AGRICULTURE (EXTENSION)  
KHYBER PAKHTUNKHWA PESHAWAR

  
DISTRICT DIRECTOR AGRICULTURE  
HARIPUR





GOVERNMENT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT  
(REGULATION WING)

Dated Peshawar, the 30-06-2015

NOTIFICATION

NO.FD/SO(FR)7-20/2015 The competent authority has been pleased to accord approval to upgradation of pay scales of the following provincial government employees with effect from 01-07-2015:

- a) Two pay scale upgradation will be allowed to all provincial government employees from BS-01 to BS-05.
- b) One pay scale upgradation will be allowed to all provincial government employees from BS-06 to BS-15.
- c) Special Compensatory Allowance equal to difference of notional upgradation of BS-16 to BS-17 will be allowed to all provincial government employees in BS-16 in lieu of upgradation.
- d) Upgradation will be applicable to both pay and allowances with freezing limits and other conditions currently in vogue unless revised by the government.
- e) Pay fixation on upgradation will be applicable w.e.f. 01-07-2015 or 01-12-2015 on the option to be given by the concerned employee.
- f) All provincial government employees who have been upgraded en-block or individually in last five years starting from 01-07-2010 or have been granted special allowance / pay equal to 40 % or more of their normal pay shall not be entitled for the instant upgradation.

2. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pay scale.

3. All the concerned Departments will amend their respective service rules to the same effect in the prescribed manner.

4. The above upgradation scheme shall not be applicable to employees of Autonomous Bodies, Semi Autonomous Bodies and Public Sector Companies.

5. Explanatory note and subsidiary instructions on the subject will be issued separately.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

P.T.O



GOVERNMENT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

(Regulation Wing)

Dated Peshawar the, 19<sup>th</sup> June 2012

**NOTIFICATION**

No.FD/SO(FR)10-22/2012.

The competent authority has been pleased to accord sanction to the enhancement of pay scales of the following posts, which exist, in all the Departments / Offices (except Secretariat Departments) of Government of Khyber Pakhtunkhwa, with effect from 23.12.2011:

S#	Nomenclature of the Post	Existing Pay Scale	Enhanced Pay Scale.
1.	Stenographers	BPS-12	BPS-14
2.	Senior Scale Stenographer	BPS-15	BPS-16
3.	Personal Assistants	BPS-15	BPS-16
4.	Private Secretaries	BPS-16	BPS-17

- i). The pay of the existing incumbents of the posts shall be fixed in the higher pay scale at a stage next above the pay in the lower pay scale.
- ii). With effect from 23.12.2011, the academic qualification for initial recruitment against the posts of Stenographers (BPS-14) will be Intermediate or equivalent and against the posts of Senior Scale Stenographers / PAs (BPS-16) will be Graduation or equivalent.
- iii). All the concerned Departments, will amend their service rules, accordingly.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

Endst: No. & Date Even.

Copy is forwarded to:

1. All Administrative Secretaries, Khyber Pakhtunkhwa.
2. Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. Accountant General, Khyber Pakhtunkhwa.
4. Secretary to Governor, Khyber Pakhtunkhwa Peshawar.
5. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. Secretary Provincial Assembly, Khyber Pakhtunkhwa.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. Registrar, Peshawar High Court, Peshawar.
9. All District Coordination Officers/Political Agents/District & Session Judges/ Executive District Officers Khyber Pakhtunkhwa.
10. Registrar Khyber Pakhtunkhwa Public Service Commission Peshawar.
11. Registrar Service Tribunal, Khyber Pakhtunkhwa.
12. All the Autonomous and Semi Autonomous Bodies, Khyber Pakhtunkhwa.
13. Secretary to Government of Punjab, Sindh and Balochistan, Finance Department, Lahore, Karachi and Quetta.
14. The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I.Khan.
15. The Treasury Officer, Peshawar.
16. All District/Agency Accounts Officer in Khyber Pakhtunkhwa/FATA.
17. PS to Minister for Finance Khyber Pakhtunkhwa.
18. PS to Chief Secretary, Khyber Pakhtunkhwa.
19. PS to Additional Chief Secretary, Khyber Pakhtunkhwa.
20. Director, Treasuries and Accounts, Khyber Pakhtunkhwa.
21. Director Local Fund Audit, Khyber Pakhtunkhwa, Peshawar.
22. Director FMIU, Finance Department for placing the same on the Website of Finance Department.
23. PS to Secretary Finance Department, Khyber Pakhtunkhwa.
24. PAs to all Additional Secretaries/Deputy Secretaries in Finance Department, Khyber Pakhtunkhwa.
25. All Section Officers/Budget Officers in Finance Department, Khyber Pakhtunkhwa.

Secretary A

6

Dated. 20. 6

S

*F. A. M. A.*  
SECTION OFFICER (FR)

(22)

Annex A

P-13

DIRECTORATE OF INFORMATION,  
GOVT. OF NWFP, PESHAWAR.  
NO. INF/ESTT/7/64/3248-3251  
Dated Pesh: the 26/4/1989.

OFFICE ORDER

In pursuance of the orders contained in Govt: of NWFP, Finance Department, Notification NO. FD/(PRG)4-1/89 dated 24.1.1989, the following stenographers of this Directorate in EPS-12 are hereby allowed (Selection Grade) EPS-15 equal to 33% of the total thirteen (13) sanctioned posts of stenographers with effect from 24.1.1989.

- |                     |                            |
|---------------------|----------------------------|
| 1. Mr. Abdul Sattar | Divnl: Inf: Office Kohat.  |
| 2. Mr. Arif Khan    | Divnl: Inf: Office A/Abad. |
| 3. Mr. Altaf-ul-Maq | Head Office.               |
| 4. Mr. Jaffar Khan  | -do-                       |

*J. J. J.*  
Assistant Director (Adm.)  
For Director of Information.

Encls: NO. INF/ESTT/7/64/ \_\_\_\_\_ Dated Pesh: the 26/4/1989.

- Copy to:-
1. Director of Information.
  2. Accountant General NWFP, Peshawar.
  3. Asstt: Director Information, Kohat.
  4. Asstt: Director Information, A/Abad.
  5. All concerned.
  6. Personal File of the officials.
  7. Bill Clerk.
  8. Office Order file.
  9. File NO. 1/59.

*J. J. J.*  
Assistant Director (Adm.)  
For Director of Information,  
Govt: of NWFP, Peshawar.