


FORM OF ORDER SHEET

Court of _____

Appeal No. 135/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	16/01/2024	<p>The appeal of Mr. Naseer Ahmad presented today by Muhammad Maaz madni Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 135 /2024

NASEER AHMAD

V/S

POPULATION WELFARE
& OTHERS

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Dated: 16th January, 2024

APPELLANT

Through:

MUHAMMAD MAAZ MADKIL

ADVOCATE HIGH COURT, PESHAWAR

TF-291, 292, Deans Trade Centre,

Peshawar Cantt:

0333-9313113, 0345-9090737

muhammad.m3adv@gmail.com



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 135 /2024

NASEER AHMAD, Driver (B-07),
o/o District Population Welfare Officer, District Mohmand at Ghallanai.
.....APPELLANT

VERSUS

- 1- DISTRICT POPULATION WELFARE OFFICER,
District Mohmand at Ghallanai.
 - 2- ACCOUNTANT GENERAL, KHYBER PAKHTUNKHWA,
Fort Road, Peshawar Cantt.:
 - 3- DISTRICT ACCOUNTS OFFICER, MOHMAND
At Ghallanai, District Mohmand.
-RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 READ
WITH ALL ENABLING LAWS & RULES AGAINST THE
ILLEGAL DEDUCTION OF RS. 10,000/- PER MONTH FROM
THE MONTHLY SALARY OF THE APPELLANT BY
RESPONDENT NO. 3 SINCE MAY 2023 TILL DATE AND
AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL
APPEAL DATED 18-09-2023 OF THE APPELLANT WITHIN
THE STATUTORY PERIOD OF (NINETY) 90 DAYS

PRAYER:

That on acceptance of the instant service appeal the deduction
@Rs. 10,000/- per month since May 2023 till date by
respondent no. 3 may very kindly be declared as illegal,
ineffective upon the rights of the appellant and direction may
kindly be issued to reimbursement of the already deducted
amount to the appellant deducted @ Rs. 10,000/- per month
since May 2023. Any other remedy which this august
Tribunal deems appropriate that may also be awarded in
favor of the appellant.

Respectfully Sheweth,

FACTS:

Brief facts giving rise to the instant appeal are as under:

1. That appellant is a regular employee of the respondent Department and was initially appointed as Driver (BPS-04)



now (BPS-07) vide order dated 19-03-2007 after fulfilling all the legal & codal formalities required for the postand since then the appellant is performing his duty quite efficiently whole heartedly and upto the entire satisfaction of his high ups.

Copy of Service Book is attached as Annexure.....A.

2. That a letter dated 05-10-2021 was received to the office of respondent no. 1 issued from the office of respondent no. 2 wherein record relating to doubtful payments made has been requisitioned for conducting inquiry, and a list of employees whom drawn arrears in respect of Pay & Allowances was also attached with the ibid letter.

Copy of Letter dated 05.10.2021 along with List is attached as Annexure B.

3. That astonishingly, after a lapse of approximately 1½ year respondent No. 3 illegally and without any clear justification started deduction in the month of May 2023 @ Rs. 10,000/- per monthly salary of the appellant without issuing any speaking order, notification or prior intimation.

Copy of Salary Slips are attached as Annexure C.

4. That appellant time and again requested the respondents for resolving the matter and to stop the illegal deduction from the monthly salaries of the appellant but all in vein, finally, the appellant filed a Departmental Appeal dated 18/09/2023 before respondent no. 1 to tackle up the matter with respondent no. 2 & 3, hence respondent no. 1 forwarded all the record to respondent no. 3 vide letter dated 25/10/2023 but date no response has been received and deduction from salaries are continued till date.

Copy of Departmental Appeal dated 18.09.2023 & Letter dated 25.10.2023 alongwith enclosed detail is attached as Annexure D & E.

5. That the appellant having no response after the statutory period of 90, feeling highly aggrieved and is left with no other remedy but to file the instant service appeal before this Honourable Tribunal on the following grounds:

GROUND:

- A- That act of the respondent no. 3 by making illegal deduction from the monthly salaries of the appellant @ Rs. 10,000/- is against the law, rules, facts, void ab initio, Norms of Natural Justice and materials available on the record hence not tenable in the eye of Law and needs interference of the this tribunal.



- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the treatment met out to the appellant by making illegal deduction from the monthly salaries of the appellant @ Rs. 10,000/- by respondent no. 3 is highly discriminatory.
- D- That act of the respondent no. 3 by making illegal deduction from the monthly salaries of the appellant @ Rs. 10,000/- is a clear violation of the Principle of Locus Penitentiae.
- E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore the respondent has to act upon the ibid Article of the constitution and had to remove the disparity from the service of the appellant by further stopping the illegal deduction from the monthly salaries of the appellant @ Rs. 10,000/-.
- F- That the respondent has acted in an arbitrary and malafide manner by making illegal deduction from the monthly salaries of the appellant @ Rs. 10,000/-.
- G- That act of the respondents is against the Fundamental Rights as enshrined in the Constitution & also against various judgments passed by the Apex Supreme Court of Pakistan.
- H- That act of the respondent no. 3 by making illegal deduction from the monthly salaries of the appellant @ Rs. 10,000/- without fulfilling the codal formalities required in the subject matter and hence the same is against the norm of Natural Justice.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 16-01-2024

Appellant

Naseer
NASEER AHMAD


Through:


MUHAMMAD MAAZ MABBANI
Advocate, High Court, Peshawar



CERTIFICATE

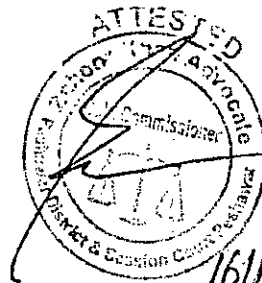
No, such like appeal has been filed or pending on the subject matter between the parties before this Honourable Tribunal.


ADVOCATE

A F F I D A V I T

I, Naseer Ahmad s/o Amroz Gul, do hereby solemnly affirm on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Naseer
DEPONENT
17301-0394356-5



16/1/2024



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2024

NASEER AHMAD

V/S

POPULATION WELFARE
& OTHERS

APPLICATION FOR TO STOP FURTHER DEDUCTION
FROM THE MONTHLY SALARIES OF THE APPELLANT
TILL FINAL DISPOSAL OF THE CASE

Respectfully Sheweth:,

1. That the appellant has filed the above titled service appeal before this Honourable Tribunal which has not been fixed so far.
2. That the appellant has challenged the illegal deduction from the monthly salaries of the appellant @ Rs. 10,000/-.
3. That balance of convenience lies in favour of the appellant.
4. That appellant has good prima facie case and is sanguine about the success of the case.
5. That deduction @ Rs. 10,000/- has been made from the monthly salaries of the appellant and if the deduction has not been stopped the appellant would suffer with irreparable loss.
6. That the ingredients of the instant application may very kindly be considered as part and parcel of the main appeal.
7. That any grounds would be agitated at the time of argument with prior permission of this Honourable Tribunal.

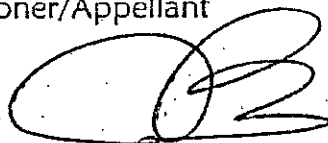


It is, therefore, most humbly prayed that on acceptance of the instant petition the deduction from monthly salaries of the appellant may very kindly be stopped till final disposal of the main appeal.

Date: 16/01/2024

Naseer
Petitioner/Appellant

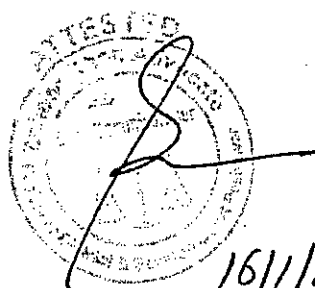
Through:



MUHAMMAD MAAZMADNI,
Advocates, High Court, Peshawar

A F F I D A V I T

I, Naseer Ahmad s/o Amroz Gul, do hereby solemnly affirm on oath that the contents of the application/petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



Naseer
DEPONENT
17301-0394356-5

16/1/2024



(7)

ANNEXURE- "A"

SERVICE BOOK

OF

Mr.

Naseer Ahmad

S/o

Amrooz Gul

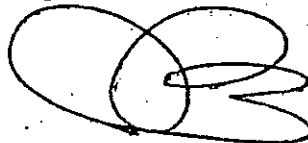
Designation

Driver

Department

PLWD FATA

ATTSTED



Price : Rs. 50/-

757

8

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: Naseer Ahmad

2. Race: Pakhtoon

3. Residence: Village Khurby Dist chawsade

4. Father's name and residence: Amrooz Gul.

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

6. Exact height by measurement: 5' 3"

7. Personal marks for identification: Mole on right hand

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

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

(Handwritten impression)
ATTESTED

Signature of Government Servant: Naseer

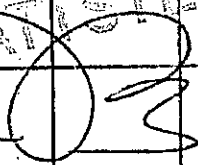
Signature and designation of the Head of the Office, or other Attesting Officer: Lubani

Agency Population Welfare Officer
Mohmand Agency

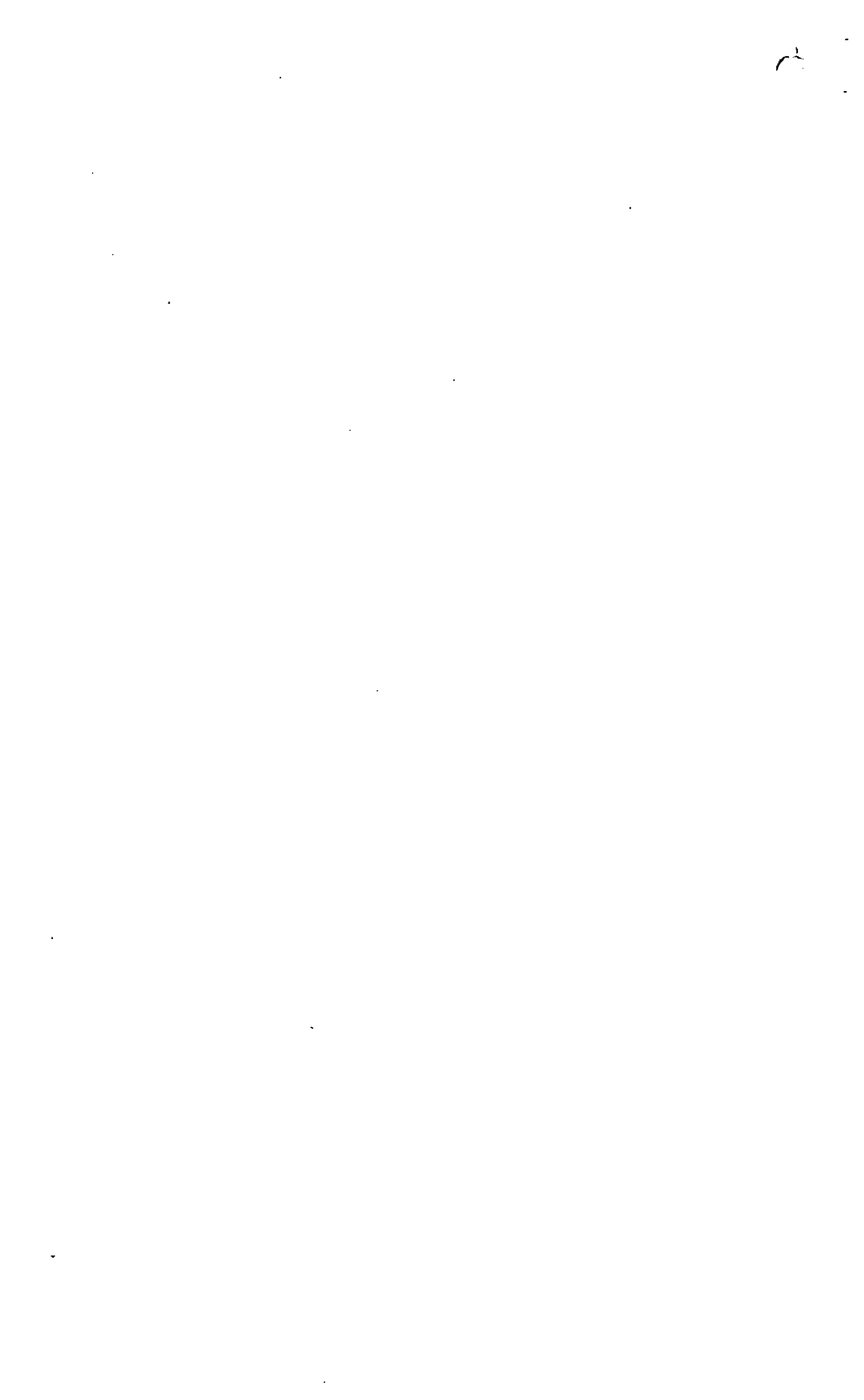


9

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 "p"	7 Date of appointment	8 Signature of Government Servant.
2345-180 BPS-4				2345		19 ³ / ₀₇	
2700-100				2700		1 ⁷ / ₂₀₀₇	
Upgraded to BPS-5 2780-135				2780		1 ⁷ / ₂₀₀₇	

ATTESTED






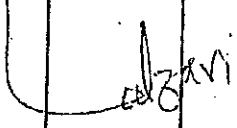
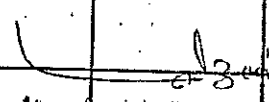
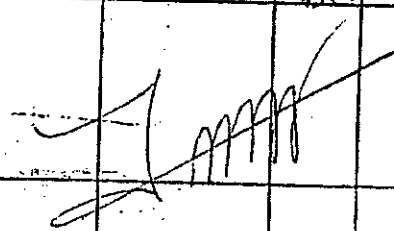
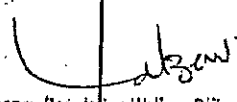
11

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 "p"	Date of appointment	Signature of Government Servant.
<i>do</i>				2915		1/12/2007	
3340-160				3580		1/7/2008	
<i>do</i>				3660		1/12/2008	
<i>do</i>				3820		1/12/2009	

ATTESTED



12

9 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 debitable to another Government			
					Period	Government to which debitable		
					Annual increment service verified w.e.b			
						18 ¹¹ / ₂₀₀₇ to 20 ¹¹ / ₂₀₀₇		
					Pay fixation w.e.b 1 ⁷ / ₂₀₀₈			
			 Agency Population Welfare Officer Mohmand Agency					
					Annual increment service verified w.e.b			
						12 ¹¹ / ₂₀₀₇ to 30 ¹¹ / ₂₀₀₈		
					Annual increment service verified w.e.b			
			 Agency Population Welfare Officer Mohmand Agency			1 ¹² / ₂₀₀₈ to 30 ¹¹ / ₂₀₀₉		

ATTACHED



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 Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government servant.
<i>Revised entries</i>							
				2915 ✓			
				3050 ✓			
				3660			
				3820			
				3980			
3340-160				3980 4140		12/2010	
5400-260				6700 ✓		7/2011	

ATTSTED
[Signature]



15

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 "op"	7 Date of appointment	8 Signature of appointing authority
<i>do</i>				6960		12-2011	
<i>do</i>				7220		12-2012	
<i>do</i>				7480		12-2013	
<i>do</i>				7740		12-2014	

ATTSTED



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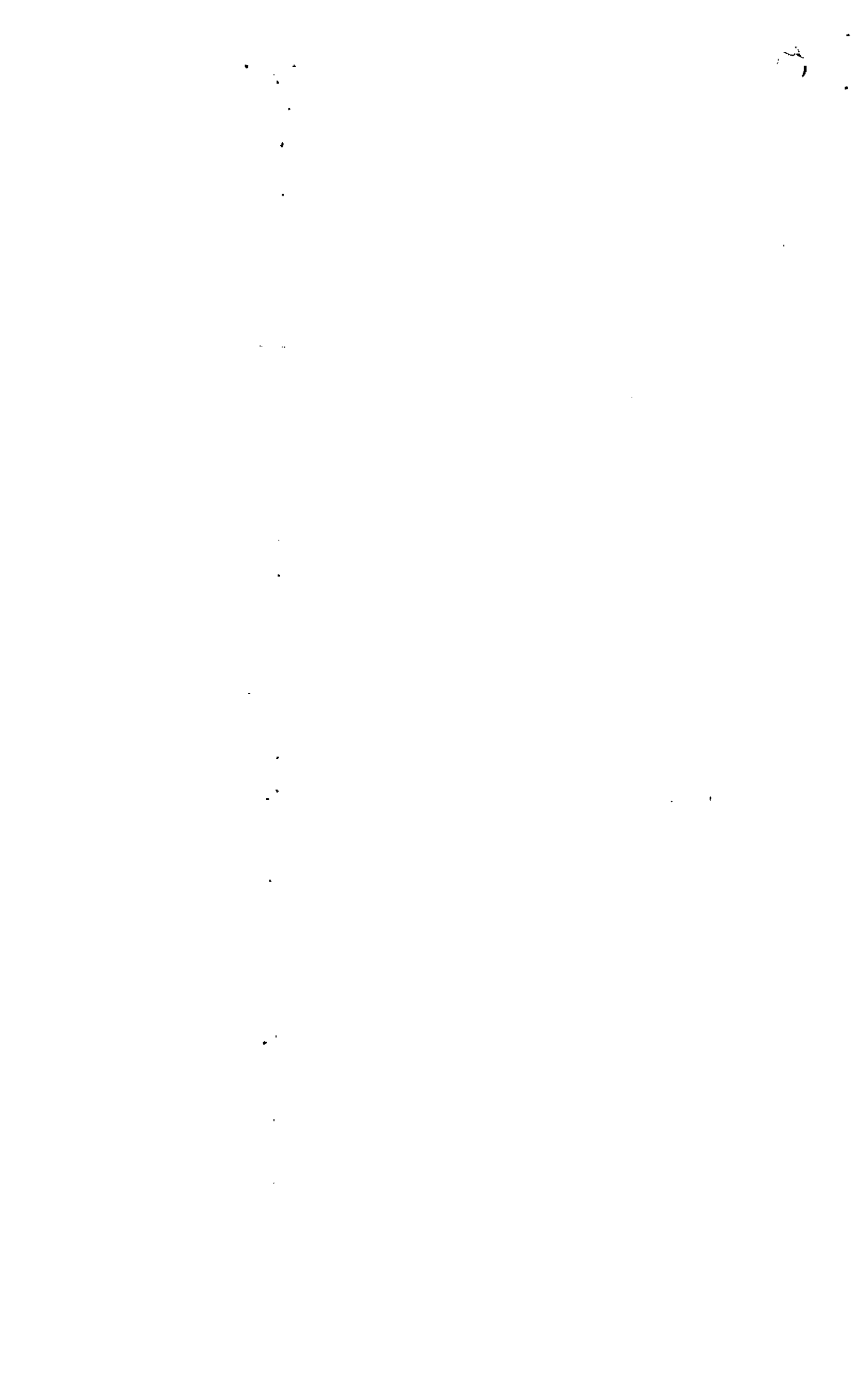
10 Name and Designation the head of the office or other attesting officer in reference to columns 1 to 8	11 Date of termination or appointment.	12 Reason of termination such as promotion, transfer, dismissal, etc.)	13 Signature of the head of the office or other attesting officer.	14 Leave		15 Reference to any recorded punish- ment 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
Annual increment		Service verified			w.e.b 11/2010 to 30/11/2011		
Annual increment		Service verified	Agency Population Welfare Officer Mahmand Agency		w.e.b 12/2011 to 30/11/2012		
Annual increment		Service verified			w.e.b 12/2012 to 30/11/2013		
Annual increment		Service verified			w.e.b 12/2013 to 30/11/2014		
Annual increment		Service verified			w.e.b 12/2014 to 30/11/2015		
Annual increment		Service verified			w.e.b 12/2015 to 30/11/2016		
Annual increment		Service verified			w.e.b 12/2016 to 30/11/2017		
Annual increment		Service verified			w.e.b 12/2017 to 30/11/2018		
Annual increment		Service verified			w.e.b 12/2018 to 30/11/2019		
Annual increment		Service verified			w.e.b 12/2019 to 30/11/2020		
Annual increment		Service verified			w.e.b 12/2020 to 30/11/2021		
Annual increment		Service verified			w.e.b 12/2021 to 30/11/2022		
Annual increment		Service verified			w.e.b 12/2022 to 30/11/2023		
Annual increment		Service verified			w.e.b 12/2023 to 30/11/2024		
Annual increment		Service verified			w.e.b 12/2024 to 30/11/2025		

ATTACHED

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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 Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant
6985- 120 340-17185			✓ 10045			1-7 2015	
<i>[Signature]</i>			10,385			1-12 15	
8590-420 21,190			13,790			1-7 2015	
<i>[Signature]</i>			13,210			1-12 16	<i>Ponne</i>

ATTACHED





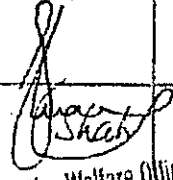
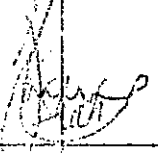

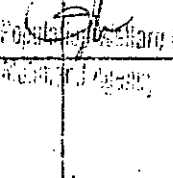
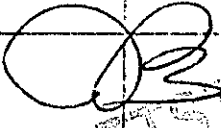
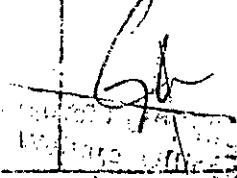
175

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Name of post	Whether an executive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Act 27, C.S.R.	Pay in substantial part	Additional Pay for officiating	Other enrollment falling under the term "app"	Date of enrollment
10,760-5001 25,960			15,860	15760		17
do			15,700 16,260			17
			16,760			17
			17,260			17

OS
 1915
 1915

20

10	11	12	13		14	15		
Name and Designation of the officer or attesting officer (Collection of columns 1 to 4)	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
1st Division w.e.b 1 ⁷ / ₂₀₁₇ 7 ⁷ / ₂₀₁₇		vide notification		(3)Emp/2017-500				
			 Agency Population Welfare Officer Mohmand Agency					
Promoted		Service verified		w.e.b 1 ¹² / ₁₀	till 30 ¹¹ / ₂₀₁₇			
 Agency Population Welfare Officer Mohmand Agency			 Agency Population Welfare Officer Mohmand Agency					
Promoted		Donation	T 2 2410	w.e.b 1 ¹² / ₁₇	till 30 ¹¹ / ₁₅			
Promoted		Service verified		w.e.b 1 ¹² / ₁₇	till 30 ¹¹ / ₁₅			
Agency Population Welfare Officer Mohmand Agency			 Agency Population Welfare Officer Mohmand Agency					
Promoted		Service verified		w.e.b 1 ¹² / ₁₈	till 30 ¹¹ / ₁₇		 Agency Population Welfare Officer Mohmand Agency	

ATTSTED

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1	2	3	4	5	6	7
Name of post	Whether substantive or officiating and whether permanent or temporary	Officially state (i) substantive appointment, or (ii) whether service counts for pension under P.W. 275 C.S.R.	(%) in substantive post	Actual Pay for officiating	Other emoluments falling under the head of	Drawn in actual pay
Revised entry						
Date		Drawn		Due		
1 ⁷ / ₁₅		10,045/-		10810/-		
1 ¹² / ₁₅		10,385/-		11225/-		
1 ⁷ / ₁₆		12,790/-		13810/- 13300/- ✓		
1 ¹² / ₁₆		13210/-		14370/- 13810		
1 ⁷ / ₁₇		15760/-		16960/- 16480 ✓		
1 ¹² / ₁₇		16260/-		17780/- 17080		
1 ¹² / ₁₈		16760/-		18310/- 17200		
1 ¹² / ₁₈		17260/-		18920/- 18310/-		

Joint Population Welfare Officer (Women and)

RECEIVED

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9	10	11	12	13			14	15
				Leave				
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
Period	Government to which debitable							
				Drawn amount of 91275 on account of upgradation.				
upgradation from BPS-05 to BPS-07 from 1/7/2015 vide notification no FD-80(ER)7-20/2015 Dated 30/6/2015.								
		District Population Welfare Officer Mohmandi						
				Drawn Rs. 1500/- on account of... 1/8/2015 to 31/7/2015				

[Signature]
 ATTESTED



25

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 Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
10990-10/12 29290			19530			1/12/21	
1630-9/10 43610			29050			1/7/22	
<i>[Signature]</i>			29100			1/07/22	

[Signature]

ATTSTED





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ANNEX - B



Office of the
Accountant General
Khyber Pakhtunkhwa, Fort Road, Peshawar
Ph # 091-9211250-53

No.MG Inquiry/2021-22/12

Dated: 05.10.2021

To

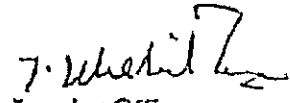
The Drawing & Disbursing Officer,
District Officer ^{Population} Social Welfare,
Tribal District Mohmand.

Subject: Requisition for provision of record related to Doubtful Payments.

The Accountant General, Khyber Pakhtunkhwa has constituted a committee to conduct fact finding enquiry into the findings reported by AG' Inspection Team regarding payments made to employees / retired personnel of your office, vide office order No. Admin-IV/DIS/DAO Mohmand/2021-22/202 dated 28.09.2021 (Copy enclosed).


Detail of payments made to your office employees / retired personnel of your office is enclosed herewith. In this connection, the relevant record of these payments (i-e attested photocopies of Source-I, II & III along with service book, appointment order in case of fresh appointment and Pension papers in case of payment to Retired Personnel) as mentioned in annexures may please be provided for verification to the inquiry committee on 12th and 13th of October, 2021 at District Accounts Office, Mohmand.

In case, your office not aware of these payments, kindly communicate officially to the inquiry committee on above mentioned date and place.


Inquiry Officer

Copy to:

1. Director Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa, Peshawar with the request to direct the District Officer Social Welfare, Tribal District Mohmand / DDOs concerned to provide the requisite record.
2. District Accounts Officer, Mohmand, with the request to verify DDOs signature on the record provide by DDOs.
3. Accounts Officer (Admin); for information.


ATTN: [unclear]



/

population

Personnels of Social Welfare Department Drawn Arrear of Pay & Allowances

P No.	Name	DOO	Cost Center	BPS	Job	Month / Year	Total
355011	JEHAN ZEB	MG6057	District Population	3	MALE MOBILIZER	01.11.2020	320,032
355013	ARSHAD KHAN	MG6057	District Population	3	MALE MOBILIZER	01.11.2020	320,032
399101	INAMULLAH AKHOONZADA	MG0131	AGENCY POPULATION WE	11	A O C	01.02.2020	165,049
		MG0131	AGENCY POPULATION WE			01.03.2021	168,000
		MG0131	AGENCY POPULATION WE			01.06.2020	420,354
		MG0131	AGENCY POPULATION WE			01.09.2019	51,057
		MG3501	AGENCY POPULATION MG	14	ASSISTANT	01.02.2014	187,260
		MG3501	AGENCY POPULATION MG			01.06.2014	384,000
407390	NASEER AHMAD	MG3501	AGENCY POPULATION MG	5	DRIVER	01.02.2014	122,453
		MG3501	AGENCY POPULATION MG			01.06.2014	240,000
437855	HAMID ULLAH	MG0148	FAMILY WELFARE CENTE	5	F W ASSISTANT (FEMALE)	01.02.2014	117,300
		MG0148	FAMILY WELFARE CENTE			01.06.2014	240,000
468369	MUHAMMAD RIAZ	MG3501	AGENCY POPULATION MG	5	DRIVER	01.02.2014	122,453
		MG3501	AGENCY POPULATION MG			01.05.2014	379,074
655209	NOWSHABA LAL MOHAMMAD KHAN	MG3501	AGENCY POPULATION MG	17	WOMEN MEDICAL OFFICER	01.02.2012	76,866
		MG3501	AGENCY POPULATION MG			01.02.2014	415,162
50190106	AYESHA IQBAL	MG3501	AGENCY POPULATION MG	17	WOMEN MEDICAL OFFICER	01.02.2014	415,162
50193171	GHAFOOR SHAH	MG6057	District Population	17	DEPUTY DISTRICT POPULATION WELFARE OFFIC	01.03.2021	180,000
		MG6057	District Population			01.05.2020	65,000
		MG6057	District Population			01.09.2019	70,824



ANNEXURE
"C" II

May-23

00407390 NASEER AHMAD

CNIC: 1730103943565 Desig: DRIVER

(80991042) Grade: 07 NTN:

Buckle No.:

Gazetted/Non-Gazetted: N

Accounts Office GHALANA

PAYROLL REGISTER

For the month of May, 2023

Page: 9

Date: 04.01.2024

DDO: MG6057 District Population Welfare Office Payroll Section: 001 Payroll 1

PAYMENTS AMOUNT DEDUCTIONS AMOUNT LOAN/FUND PRINCIPAL REPALD BALANCE

0001 Basic Pay	29,050.00	3007 GPF Subscription	1,500.00-	GPF#:	64,679.00
1001 House Rent Allowance	2,384.00	4200 Professional Tax	1,000.00-		
1210 Convey Allowance 20	1,932.00	3501 Benevolent Fund	1,200.00-		
1300 Medical Allowance	1,500.00	3915 Health (ROP)	10,000.00-		
1528 Unattractive Area A	1,500.00	4004 R. Benefits & Death C	450.00-		
2148 15% Adhoc Relief All	387.00				
2199 Adhoc Relief Allow @	260.00				
2315 Special Allowance 20	3,500.00				
2341 Dispr. Red All 15% 2	3,021.00				
2347 Adhoc Rel Al 15% 22	3,021.00				

PAYMENTS 46,555.00 DEDUCTIONS 14,150.00- NET PAY 32,405.00 01.05.2023 31.05.2023
Branch Code:250371 SHABQADAR ALLIED BANK LIMITED SHABQADAR Accnt.No: 2787-4

ANNEXURE
"C" II



Jun-23

00407390 NASEER AHMAD CNIC: 1730103943565 Desig: DRIVER (80991042) Grade: 07 NTN: Buckle No.: Gazetted/Non-Gazetted: N
DDO : MG6057 District Population Welfare Office Payroll Section : 001 Payroll 1

PAYMENTS	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE
0001 Basic Pay	29,050.00	3007 GPF Subscription	1,500.00-				
1001 House Rent Allowance	2,384.00	4200 Professional Tax	1,000.00-				
1210 Convey Allowance 20	1,932.00	3501 Benevolent Fund	1,200.00-				
1300 Medical Allowance	1,500.00	3915 Health (ROP)	10,000.00-				
1528 Unattractive Area A	1,500.00	4004 R. Benefits & Death C	450.00-				
2148 15% Adhoc Relief All	387.00						
2199 Adhoc Relief Allow @	260.00						
2315 Special Allowance 20	3,500.00						
2341 Dispr. Red All 15% 2	3,021.00						
2347 Adhoc Rel Al 15% 22(3,021.00						
PAYMENTS	46,555.00	DEDUCTIONS	14,150.00-	NET PAY	32,405.00	01.06.2023	31.06.2023

GPF#: 64,679.00

Handwritten signature and a vertical stamp that reads "NASEER AHMAD".

Branch Code:250371 SHABQADAR ALLIED BANK LIMITED SHABQADAR Accnt.No: 2787-4



23-Jul

00407390 NASEER AHMAD

CNIC: 1730103943565

Desig: DRIVER

(80991042) Grade: 07 NTN:

Buckle No.:

Gazetted/Non-Gazetted: N

PAYMENTS

AMOUNT

DEDUCTIONS

AMOUNT

LOAN/FUND

PRINCIPAL

REPAID

BALANCE

0001 Basic Pay	29,960.00	3007 GPF Subscription	1,500.00-	GPF#:	55,219.00	
1001 House Rent Allowance	2,384.00	3501 Benevolent Fund	1,200.00-	INCOME TAX	2,385.24	199.00 2,186.47
1210 Convey Allowance 20	1,932.00	3915 Health (ROP)	10,000.00-			
1300 Medical Allowance	1,500.00	4004 R. Benefits & Death C	450.00-			
1528 Unattractive Area. A	1,500.00	3609 Income Tax	199.00-			
2148 15% Adhoc Relief All	387.00-					
2199 Adhoc Relief Allow @	260.00					
2315 Special Allowance 20	3,500.00					
2341 Dispr. Red All 15% 2	3,021.00					
2347 Adhoc Rel Al 15% 22{	3,021.00					
2378 Adhoc Relief All 202	10,486.00					

PAYMENTS 57,951.00 DEDUCTIONS 13,349.00 NET PAY 44,602.00 01.07.2023 31.07.2023
 Branch Code:250371 SHABQADAR ALLIED BANK LIMITED SHABQADAR Accnt.No: 2787-4

2787-4

16

K

NASEER AHMAD
PAYMENTS

CNIC: 1730103943565
AMOUNT DEDUCTIONS

Desig: DRIVER (80991042) Grade: 07 NTN:
AMOUNT LOAN/FUND

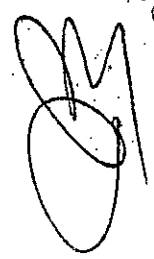
Buckle No.: Gazetted/Non-Gazetted: N
PRINCIPAL REPaid BALANCE

0001 Basic Pay	29,960.00	3007 GPF Subscription	1,500.00-	GPF#:	-58,219.00		
1001 House Rent Allowance	2,384.00	3501 Benevolent Fund	1,200.00-	INCOME TAX	2,385.24	597.00	1,788.48
1210 Convey Allowance 20	1,932.00	3915 Health (ROP)	10,000.00-				
1300 Medical Allowance	1,500.00	4004 R. Benefits & Death C	450.00-				
1528 Unattractive Area A	1,500.00	3609 Income Tax	199.00-				
2148 15% Adhoc Relief All	387.00						
2199 Adhoc Relief Allow @	260.00						
2315 Special Allowance 20	3,500.00						
2341 Dispr. Red All 15% 2	3,021.00						
2347 Adhoc Rel Al 15% 22(3,021.00						
2378 Adhoc Relief All 202	10,486.00						

PAYMENTS 57,951.00
Branch Code:250371 SHABQADAR

DEDUCTIONS 13,349.00-
ALLIED BANK LIMITED SHABQADAR

NET PAY 44,602.00 01.08.2023 30.08.2023
Acct.No: 2787-4


Gazetted

32

NASEER AHMAD CNIC: 1730103943565 Desig: DRIVER (80991042) Grade: 07 NTN: Buckle No.: Gazetted/Non-Gazetted: N
 PAYMENTS AMOUNT DEDUCTIONS AMOUNT LOAN/FUND PRINCIPAL REPAYD BALANCE

0001 Basic Pay	29,960.00	3007 GPF Subscription	1,500.00-	GPF#:	58,219.00	
1001 House Rent Allowance	2,384.00	3501 Benevolent Fund	1,200.00-	INCOME TAX	2,385.24	597.00 1,788.48
1210 Convey Allowance 20	1,932.00	3915 Health (ROP)	10,000.00-			
1300 Medical Allowance	1,500.00	4004 R. Benefits & Death C	450.00-			
1528 Unattractive Area A	1,500.00	3609 Income Tax	199.00-			
2148 15% Adhoc Relief All	387.00					
2199 Adhoc Relief Allow @	260.00					
2315 Special Allowance 20	3,500.00					
2341 Dispr. Red All 15% 2	3,021.00					
2347 Adhoc Rel Al 15% 22(3,021.00					
2378 Adhoc Relief All 202	10,486.00					

PAYMENTS 57,951.00 DEDUCTIONS 13,349.00- NET PAY 44,602.00 01.09.2023 30.09.2023
 Branch Code:250371 SHABQADAR ALLIED BANK LIMITED SHABQADAR Accnt.No: 2787-4

(Handwritten Signature)
 DELICIOUS

(Handwritten Mark)



00407390 NASEER AHMAD
PAYMENTS

CNIC: 1730103943565

Desig: DRIVER

(80991042) Grade: 07 NTN:

Buckle No.:

Gazetted/Non-Gazetted: N

0001 Basic Pay	29,960.00	3007 GPF Subscription	1,500.00-	GPF#:	59,719.00		
1001 House Rent Allowance	2,384.00	3501 Benevolent Fund	1,200.00-	INCOME TAX	2,385.24	796.00	1,589.52
1210 Convey Allowance 20	1,932.00	3915 Health (ROP)	10,000.00-				
1300 Medical Allowance	1,500.00	4004 R. Benefits & Death C	450.00-				
1528 Unattractive Area A	1,500.00	3609 Income Tax	199.00-				
2148 15% Adhoc Relief All	387.00						
2199 Adhoc Relief Allow @	260.00						
2315 Special Allowance 20	3,500.00						
2341 Dispr. Red All 15% 2	3,021.00						
2347 Adhoc Rel Al 15% 22(3,021.00						
2378 Adhoc Relief All 202	10,486.00						

PAID
31.10.2023

PAYMENTS 57,951.00 DEDUCTIONS 13,349.00- NET PAY 44,602.00 01.10.2023 31.10.2023
Branch Code:250371 SHABQADAR ALLIED BANK LIMITED SHABQADAR Accnt.No: 2787-4

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00407390 NASEER AHMAD
PAYMENTS

CNIC: 1730103943565

Desig: DRIVER

(80991042) Grade: 07 NTN:

Buckle No.:

Gazetted/Non-Gazetted: N

0001 Basic Pay	29,960.00	3007 GPF Subscription	1,500.00-	GPF#:	63,179.00
1001 House Rent Allowance	2,384.00	6075 Adj GPF	1,960.00-	INCOME TAX 2,385.24	995.00 1,390.62
1210 Convey Allowance 20	1,932.00	3501 Benevolent Fund	1,200.00-		
1300 Medical Allowance	1,500.00	3915 Health (ROP)	10,000.00-		
1528 Unattractive Area A	1,500.00	4004 R. Benefits & Death C	450.00-		
2148 15% Adhoc Relief All	387.00	3609 Income Tax	199.00-		
2199 Adhoc Relief Allow @	260.00				
2315 Special Allowance 20	3,500.00				
2341 Dispr. Red All 15% 2	3,021.00				
2347 Adhoc Rel Al 15% 22(3,021.00				
2378 Adhoc Relief All 202	10,486.00				

PAYMENTS

57,951.00

DEDUCTIONS

15,309.00-

NET PAY

42,642.00 01.11.2023 30.11.2023

Branch Code:250371

SHABQADAR

ALLIED BANK LIMITED

SHABQADAR

Accnt.No: 2787-4

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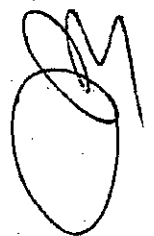
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004073901

PAYMENTS	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE
0001 Basic Pay	30,870.00	3007 GPF Subscription	1,500.00-	GPF#:		64,679.00	
1001 House Rent Allowance	2,384.00	3501 Benevolent Fund	1,200.00-	INCOME TAX	2,544.48	1,217.00	1,328.10
1210 Convey Allowance 20	1,932.00	3915 Health (ROP)	10,000.00-				
1300 Medical Allowance	1,500.00	4004 R. Benefits & Death C	450.00-				
1528 Unattractive Area A	1,500.00	3609 Income Tax	222.00-				
2148 15% Adhoc Relief All	387.00						
2199 Adhoc Relief Allow @	260.00						
2315 Special Allowance 20	3,500.00						
2341 Dispr. Red All 15% 2	3,021.00						
2347 Adhoc Rel Al 15% 22(3,021.00						
2378 Adhoc Relief All 202	10,486.00						

Accounts Office GHALANAI
 PAYROLL REGISTER
 For the month of December ,2023

Page : 9
 Date : 04.01.2024

RECEIVED


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DDO : MG6057 District Population Welfare Office Payroll Section : 001 Payroll 1
 PAYMENTS 58,861.00 DEDUCTIONS 13,372.00- NET PAY 45,489.00 01.12.2023 31.12.2023
 Branch Code:250371 SHABQADAR ALLIED BANK LIMITED SHABQADAR Acct.No: 2787-4



محکمہ جناب DPW آفیسر محمد علی
دعوت برائے مہنگہ بندی کی کمیٹی کا اجلاس منعقد ہوا

مورد مذکور میں کمیٹی کے رکنوں نے اپنے اپنے حصہ میں
لیکچر ڈرائنگز کام کرنا ہے۔ سائٹ کے مہنگے بھی
تعمیرات مہنگوں سے ملنے پر مبنی ہے جسکی وجہ سے سائٹ کی ٹورنگ
موقوف کر دیا گیا ہے۔ سائٹ کی مہنگہ میں سے مہنگے کے قینے سے
دس ہزار روپے کی کمیٹی میں سے ملے ہوئے ہیں جس کی مہنگہ
سائٹ کی مہنگہ مہنگہ سے ملے ہوئے ہیں مہنگہ سے ملے ہوئے ہیں
مہنگے سے سائٹ کی مہنگہ مہنگہ سے ملے ہوئے ہیں۔
اس کے علاوہ مہنگوں سے (مہنگہ مہنگہ) سے ملے ہوئے ہیں
کی مہنگہ میں سے (مہنگہ مہنگہ) سے ملے ہوئے ہیں
مہنگہ مہنگہ سے ملے ہوئے ہیں۔

فنا علی

1423
18/9/23

اعراض

انجینئر محمد
ڈپٹی ڈائریکٹر
DPW
محمد

ATTACHED

ATTACHED



38



OFFICE OF THE
DISTRICT POPULATION WELFARE OFFICER
MOHMAND

F.No.1(1) 2023/Account/ 1467-69

Dated 25/10/2023

To

The District Account Officer,
Mohmand at Ghallani.

ANNEXURE - E

Subject: PROVISION OF RECORD RELATED TO DOUBTFUL PAYMENTS.

Refer to the subject cited above, vide Inquiry Officer Account general Khyber Pakhtunkhwa letter No MG Inquiry /2021-22/12 dated 05/10/2021 and in continuation of this office letter No 1(202021-22/Admn/2335-37 dated 27/10/2021 & 20/10/2021, 21/09/2023 detail of payments (source --II) along with relevant documents are hereby enclosed.

Gh. Shah.

District Population Welfare Officer,
Mohmand.

- Deputy Director Population Welfare Merged Districts for information please.
- Account Section District Population Welfare Office Mohmand.

District Population Welfare Officer,
Mohmand.

ATTACHED

(39)

Subject: PROVISION OF RECORD RELATED TO DOUBTFUL PAYMENTS.

Refer to the subject cited above, vide Inquiry Officer Account general Khyber PakhtunKhwā letter No MG Inquiry /2021-22/12 dated 05/10/2021 and in continuation of this office letter No 1(202021-22/Admn/2335-37 dated 27/10/2021 & 20/10/2021 & 21/09/2023, detail of payments is as below. Furthermore, relevant documents are hereby enclosed.

1. Employee Name Naseer Ahmad Driver BPS-07 P.No 407390

I. Amount of 122,453/- MG3501 01/02/2014

As after the 18th amendment Population Welfare Department EX-FATA administrative control was shifted to Ministry of National Health Services Regulations and Coordination Islamabad. Due to which the budget and salary issue rise. Due to which salary of all employees of District Population Welfare Mohmand were stopped. Budget was released in the month of Feb 2014 and Salary of Seven months issued in the month of Feb 2014 i.e from 1/07/2013 to 28/02/2014 expenditure statement downloaded from PIFRA website is hereby attached for reference (Anx-1). The said amount of Rs.122,453 is the arrear of six months pay from 1/07/2013 to 31/01/2014 copy of source II (Anx-2) is hereby attached along with Budget copy (Anx-3).

II. Amount of Rs.240,000/- 01/06/2014

Till the merger of FATA with Khyber PakhtunKhwā the Population Welfare Department was funded under Public Sector Development Program (PSDP). In August 2008 the Federal Government that Finance Division vide Notification F.16(1)R-14/2003 dated 12/08/2008 (Anx-4) awarded project allowance to all employees in PSDP funded programs. Amount of Rs-240,000/ was drawn as arrear of Project allowance from 1/08/20028 to 31/07/2013 @ 4000 per month. Copy of notification and approval from Additional Chief Sectary FATA (Principal Accounting Officer FATA) (Anx-5) Source II (Anx-6) is hereby attached.

Furthermore, copy of Service book of the said official is hereby attached (Anx-7).

2. Employee Name Inam Ullah Account Assistant BPS-16 P.No 407390

III. Amount of 187,280/- MG3501 1/02/2014

As after the 18th amendment Population Welfare Department EX-FATA administrative control was shifted to Ministry of National Health Services Regulations and Coordination Islamabad. Due to which the budget and salary issue rise. Due to which salary of all employees of District Population Welfare Mohmand were stopped. Budget was released in the month of Feb 2014 and Salary of Seven months issued in the month of Feb 2014 i.e from 1/07/2013 to 28/02/2014 expenditure statement downloaded from PIFRA website is hereby attached for reference (Anx-1). The said amount of Rs.187,280 is the arrear of six months pay from 1/07/2013 to 31/01/2014 copy of source II (Anx-8) is hereby attached along with Budget copy (Anx-3).

IV. Amount of Rs.384,000/- dated 1/06/2014

Till the merger of FATA with Khyber PakhtunKhwā the Population Welfare Department was funded under Public Sector Development Program (PSDP). In August 2008 the Federal Government that Finance Division vide Notification F.16(1)R-14/2003 dated 12/08/2008 (Anx-4) awarded project allowance to all employees in PSDP funded programs. Amount of Rs-384,000/ was drawn as arrear of Project allowance from 1/08/20028 to 31/07/2012 @ 8000 per month. Copy of notification and approval from Additional Chief Sectary FATA (Principal Accounting Officer FATA) (Anx-5) along with source II (Anx-9) is here by attached.

V. Amount of Rs.51057/- dated 01/09/2019

Before the merger of FATA with Khyber PakhtunKhwā the Population Welfare Department was funded under Public Sector Development Program (PSDP). As after the merger of FATA with Khyber PakhtunKhwā position codes were not allotted to the





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employees of Population Welfare Department due to which the salary of all employees of Population welfare Department as position codes were allotted to Population Welfare Department in Sep 2019. Amount of Rs-51057/- is the arrear of salary for the month of Sep 2019 copy of Source II is hereby attached (Anx-10). As July 2019 salary was drawn from Federal cost center MG3501 which was transfer to District cost center MG6057 in the month of Dec 2019.

VI. Amount of Rs.165049/- 01/02/2020

As the Population Welfare Department was funded under PSDP but its employees were regular employees vide Cabinet Secretariat office Memorandum No 10/30/2008R-II Islamabad, the 29th August, 2008 (Anx-11). As Peshawar High Court Upgraded the posts of Account Assistants to BPS-16 vide written petition No 792-P/2018 dated 7/11/2019 and Khyber PakhtunKhwa government one step up graduation to the employees from BPS-06 to BPS-15 from 1/07/2015 vide notification No FD/SO(FR)7-20/2015 dated 30/06/2015. Arrear detail (Anx-12) and notifications (Anx-13) are hereby attached along with service book entry page photo copy (Anx-12).

VII. Amount of Rs.420354 dated 1/06/2020 & 168000/- dated 01/03/2021

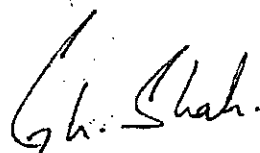
As the Population Welfare Department was funded under PSDP program till merger with Khyber PakhtunKhwa. As in PC-1 approved for Population Welfare Department from 1st July 2010 to 30th June 2015 which was further extended to 30/06/2019 copies of administrative approval and extension of PC 1 is hereby attached (Anx-14). In PC-1 Un attractive area allowance was approved for the employees of different cadres. @8000 UAA per month was approved for Account Assistants. detail pf payments is hereby attached (Anx-15). Copies of Source II attached (Anx-16)


Amount of 420354 detail arrear 1/07/2010 to 30/10/2014 (52 months)

Amount of 168000 detail arrear 1/11/2014 to 31/07/2016 (21 months)

Furthermore, the photocopy of Service book of the said official is hereby attached as (Anx-17)

Submitted for further necessary action.


District Population Welfare Officer,
Mohmand.


ATTACHED

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1

(POWER OF ATTORNEY)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2024

NASEER AHMAD

VS

GOVT. OF KP & OTHERS

I, Naseer Ahmad do hereby nominated and appointed **MUHAMMAD MAAZ MADNI**, Advocate High Court, Peshawar, to be counsel in the above matter for me/us and on my/our behalf as agreed to appear, plead, act and answer in the above court or any appellate court or any court to which the business is transferred in the above matter as and is agreed to sign and file petition, appeals, statements, accounts, exhibits, compromises or other documents whatsoever, in connection with the said matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc and to apply for and issue summons and other writs or subpoena and to apply for and get issued any arrest, attachment or other execution, warrants or order and to conduct any proceedings that may arise there out; and to apply for and receive payment of any or all sums or submit the above matter to arbitration, and to employ an other legal practitioner authorizing him to exercise the power and authorities hereby conferred on the advocate whenever he may think fit to do so.

AND to do all acts legally necessary to manage and conduct the said case in all respects whether herein specified or not, as may be proper and expedient.

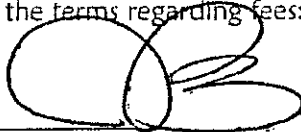
AND I/WE hereby agree to ratify and confirm all lawful acts done on my/our behalf; under or by virtue of these present or of the usual practice in such matter. PROVIDED always that I/WE undertake at the time of calling of the case by the court I/MY authorized agent shall inform the advocate and make him appear in the court, if the case, may be dismissed in default, it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

IN WITNESS WHERE OF I/We hereunto set MY/OUR hand to these presents, the contests of which have been explained to and understood by ME/US this 13th day of January 2024.

EXECUTANT

Naseer
(Naseer Ahmad)

Accepted subject to the terms regarding fees:



MUHAMMAD MAAZ MADNI,
ADVOCATE HIGH COURT, PESHAWAR
BC No. (BC-11-1460)
CNIC No. 17101-9263898-1

OFFICE: KHATTAK LAW ASSOCIATES,
TF-291 & 292, Deans Trade Centre, Peshawar Cantt.

Contact#: 0333-9313113, 0314-9965666

