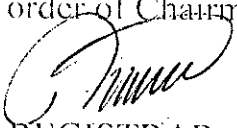


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

136/2024

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. Inamullah Akhunzada presented today by Muhammad Maaz madni Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. 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. 136 /2024

INAMULLAH AKHONZADA

V/S

POPULATION WELFARE
& OTHERS


INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1-4
2.	Stay Application/petition	5-6
3.	Service Book	A	7-19
4.	Letter dated 05.10.2021 along with List	B	20-21
5.	Salary Slips	C	22-29
6.	Departmental Appeal dated 18.09.2023	D	30
7.	Letter dated 25.10.2023 alongwith enclosed detail	E	31-33
8.	Wakalatnama	34

Dated: 16th January, 2024

Through:

APPELLANT


MUHAMMAD MAAZ MADNI,
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. 136 /2024

INAMULLAH AKHONZADA, Accounts Assistant (B-16),
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:

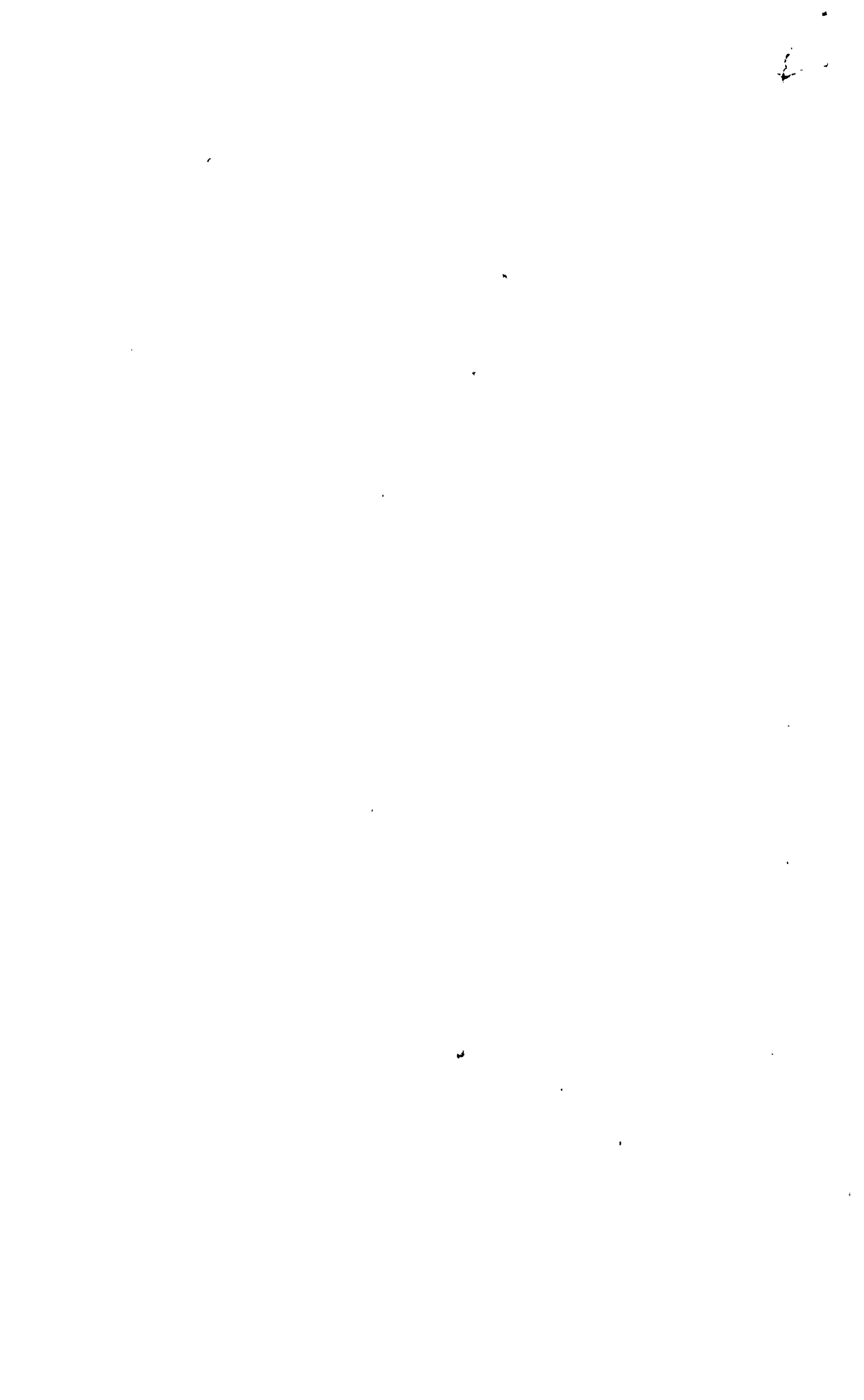
That on acceptance of the instant service appeal the deduction
@Rs. 10,000/- per month since May 2023 till date by
respondent no. 3 may very kindly be declare as illegal,
ineffective upon the rights of the appellant and direction may
kindly be issued to reimbursement of the already deducted
amount to 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 raise to the instant appeal are as under:

1. That appellant is a regular employee of the respondent Department and was initially appointed as Accounts



Assistant(BPS-11) now (BPS-16) vide order dated 10-03-2008 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 1 ½ 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 AnnexureC.

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/- 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 Penitenciae.
- 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: 15-01-2024

Appellant



INAMULLAHAKHUNZADA

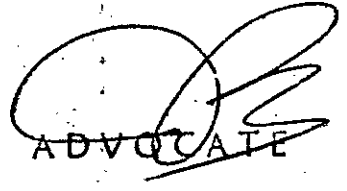
Through:



MUHAMMAD MAAZMADNI
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, Inamullah Akhonzada s/o Kifayat Ullah, 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.


DEPONENT
17101-1616050-7



15/1/2024

2.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2024

INAMULLAHAKHONZADA

V/S

POPULATION WELFARE
& OTHERS

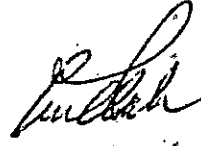
APPLICATION FOR TO STOP FURTHER DEDUCTION
FROM THE MONTHLY SALARIES OF THE APPELLANT
TILL FINAL DISPOSAL OF THE CASE

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.

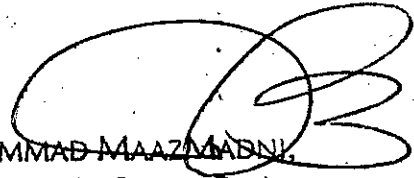
It is, therefore, most humbly prayed that on acceptance of the instant petition the deduction from monthly salaries of the appellant may very kindly be stopped till final disposal of the main appeal.

Date: 15/01/2024



Petitioner/Appellant

Through:



MUHAMMAD MAAZ MAZNI,
Advocates, High Court, Peshawar

A F F I D A V I T

I, Inamullah Akhonzada s/o Kifayat Ullah, 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.



DEPONENT
17101-1616050-7



16/01/2024

(7)

ANNEXURE - A

A

SERVICE BOOK

OF

Mr. Inam Ullah Akhonzade

S/o Kibat Ullah

Designation A. A

Department Agency Population Welfare

Price : Rs. 30/-

8

Note: 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: H. Inam Ullah Akhonzada

2. Race: Pushto (Afghan)

3. Residence: Mirza Khuby P/O Shabkadar Dist / the
Lashkara

4. Father's name and residence: Khalil Ullah (As above)

5. Date of birth by Christian era as nearly as can be ascertained: 04/11/1927

6. Exact height by measurement: 5' - 5"

7. Personal marks for identification: Nil

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


Little Finger

Ring Finger

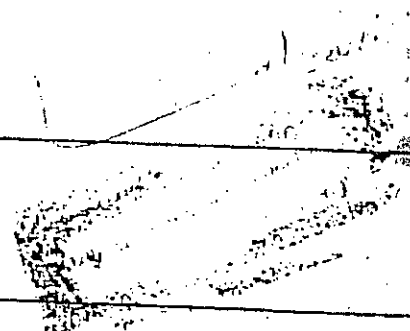
Middle Finger

Fore Finger

Thumb



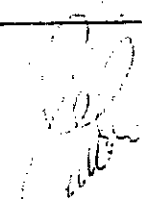
ATTESTED


9. Signature of Government Servant: 

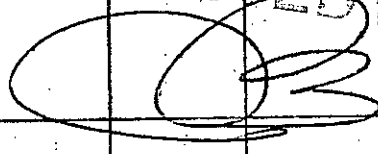
10. Signature and designation of the Head of the Office, or other Attesting Officer: 

6.

9

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.
Assistant 12.12.11 Pay (3430-250-10.12)	Substantive 13.12.11	Yes	2430	-	-	10.12.11	
Pay Revised (4115-275-11,750)						1/01/2013	
Asst Assistant 15.12.11						15.12.11	

ATTSTED





16

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 6	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		
				Appointment as	A A C P S III		
				on contract basis	on order No. F.A. 11/11-11/2007-08/Pop		
				3900-73	dt 10-03-08 from Deputy Director Population Welfare in		
				Agency Pop Welfare	Mehmand Agency and taken on establishment from 10/3/2008		
				MS. Inam ulah	A A is transferred to B.P.S III - according to the revised PC-1 for		
				the year 2008-09 - and vide Letter No. F.A. 11/11-11/2007-08/Pop/456-72			
				Dear Sir	406 as per of Wgordation ref 187/08 to 31/08		

Service verified.
 Pay fixation.
 Agency Population Welfare
 Officer Mehmand Agency


Agency Population Welfare
 Officer Mehmand Agency

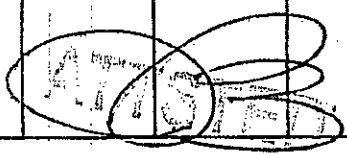
Agency Population Welfare
 Officer Mehmand Agency

Dear Sir
 406 as per
 of Wgordation ref 187/08
 to 31/08

15/11/08

(11)

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 An. 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
(4920 - 380 - 16320) (B.P.S 14)				5300		1 ¹² / ₂₀₀₈	
do				5680			
a							
do				6060		1 ¹² / ₂₀₀₈	
do				6440		1 ¹² / ₂₀₁₀	
8000-610				11050		1 ⁷ / ₂₀₁₁	





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 debitible to another Government			
					Period			Government to which debitible
		Annual increment						
		one special increment	<i>[Signature]</i> Agency Population Welfare Officer Mohmand Agency					
		Annual increment	<i>[Signature]</i> Agency Population Welfare Officer Mohmand Agency					
		Annual increment	<i>[Signature]</i> Agency Population Welfare Officer Mohmand Agency					
		Annual increment						
		Pay fixation w.e.b. 7/2011		<i>[Signature]</i>		ATTACHED <i>[Signature]</i>		
				<i>[Signature]</i>				

(13)

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
do				11660		1/12 2014	
				12270		1/12 2012	
				12880		1/12 2013	
do				13490/-		1/12 2014	
do				17450		1/7 2015	

Me
AM

STOPPED

4

7

8

9

10

(15)

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.
do				18240 ✓ 17600		1/12/18	
do				22250/-		1/7/18	
do				23500/-		1/10/18	
do				28050/-		1/11/18	
do				29220/-		1/17/18	

ATTESTED

16

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
		Normal increment	Service verified	w.e.f. 1 ¹² / ₂₀₁₄	till 30 ¹¹ / ₂₀₁₅			
		Gh. Shah	Gh. Shah					
		Pay revised w.e.f. 1 ⁷ / ₂₀₁₆	in the light of Finance Division.					
			Gh. Shah	Agency Population Welfare Officer Mohmand Agency				
		Normal increment	Service verified	w.e.f. 1 ¹² / ₂₀₁₅	till 30 ¹¹ / ₂₀₁₆			
		Gh. Shah	Gh. Shah	Agency Population Welfare Officer Mohmand Agency				
		Pay revised w.e.f. 1 ⁷ / ₂₀₁₇	in the light of Finance division letter no 1(3)1247/2017-500 dated 30 July 2017.					
			Gh. Shah	Agency Population Welfare Officer Mohmand Agency				
		Normal increment	Service verified	w.e.f. 1 ¹² / ₂₀₁₆	till 30 ¹¹ / ₂₀₁₇			
		Gh. Shah	Gh. Shah	Agency Population Welfare Officer Mohmand Agency				
		T-01/24/518						
		Agency Population Welfare Officer Mohmand Agency	Agency Population Welfare Officer Mohmand Agency					
		as per Add.						

ATTACHED



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ANNEX - B



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

No.MC inquiry/2021-22/12

Dated: 05.10.2021

To

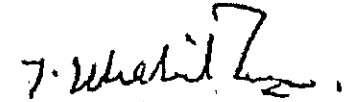
The Drawing & Disbursing Officer,
District Officer ^{Populations} Social Welfare,
Tribal District Mohmand.

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-II/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.

ATTSTED




population
Personnels of Social Welfare Department Drawn Arrear of Pay & Allowances

P No.	Name	DDO	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 D 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	187,280
		MG3501	AGENCY POPULATION MG			01.06.2014	38,000
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

ATTST


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ANNEXURE C⁹



Dist. Govt. KP-Provincial
District Accounts Office GHALANAI
Monthly Salary Statement (May-2023)

Personal Information of Mr INAMULLAH AKHOONZADA d/w/s of KIFAYATULLAH

Personnel Number: 00399101 CNIC: 1710116160507 NTN:
Date of Birth: 04.11.1987 Entry into Govt. Service: 15.03.2008 Length of Service: 15 Years 02 Months 018 Days

Employment Category: Active Temporary

Designation: ACCOUNTS ASSISTANT 80990159-DISTRICT GOVERNMENT KHYBE

DDO Code: MG6057-District Population Welfare Office Mohmand

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A C No: IV-JM.MND.4775 GPF Interest applied GPF Balance: 278,119.00 (provisional)

Vendor Number: 30484617 - INAM ULLAH AKHUNZADA

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	57,450.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	3,500.00	2148	15% Adhoc Relief All-2013	860.00
2199	Adhoc Relief Allow @ 10%	555.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Rel All 15% 2022KP	5,573.00	2347	Adhoc Rel Al 15% 22(PS17)	5,573.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-4,960.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-940.00	3914	Education (ROP)	-11,688.00
3915	Health (ROP)	-10,000.00	4004	R. Benefits & Death Comp:	-650.00
4260	Professional Tax	-1,200.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	150,000.00	-7,500.00	22,500.00

Deductions - Income Tax

Payable: 11,436.38 Recovered till MAY-2023: 10,498.00 Exempted: 0.80- Recoverable: 939.18

Gross Pay (Rs.): 87,602.00 Deductions: (Rs.): -38,438.00 Net Pay: (Rs.): 49,164.00

Payee Name: INAMULLAH AKHOONZADA

Account Number: 754940

Bank Details: NATIONAL BANK OF PAKISTAN, 231435 SHABQADAR SHABQADAR,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: akhoonzada5@gmail.com

ATTACHED

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Dist. Govt. KP-Provincial
District Accounts Office GHALANAI
Monthly Salary Statement (June-2023)



Personal Information of Mr INAMULLAH AKHOONZADA d/w/s of KIFAYATULLAH

Personnel Number: 00399101 CNIC: 1710116160507 NTN:
Date of Birth: 04.11.1987 Entry into Govt. Service: 15.03.2008 Length of Service: 15 Years 03 Months 017 Days

Employment Category: Active Temporary

Designation: ACCOUNTS ASSISTANT 80990159-DISTRICT GOVERNMENT KHYBE

DDO Code: MG6057-District Population Welfare Office Malmund

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: IV.JM.MND.4775 GPF Interest applied GPF Balance: 290,579.00 (provisional)

Vendor Number: 30484617 - INAM ULLAH AKHUNZADA

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	57,450.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	3,500.00	2148	15% Adhoc Relief All-2013	860.00
2199	Adhoc Relief Allow @ 10%	555.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	5,573.00	2347	Adhoc Rel Al 15% 22(PS17)	5,573.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-4,960.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-939.00	3914	Education (ROP)	-11,688.00
3915	Health (ROP)	-10,000.00	4004	R. Benefits & Death Comp.	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	150,000.00	-7,500.00	15,000.00

Deductions - Income Tax

Payable: 11,436.38 Recovered till JUN-2023: 11,437.00 Exempted: 0.62 Recoverable: 0.00

Gross Pay (Rs.): 87,602.00 Deductions: (Rs.): -37,237.00 Net Pay: (Rs.): 50,365.00

Payee Name: INAMULLAH AKHOONZADA

Account Number: 7549-0

Bank Details: NATIONAL BANK OF PAKISTAN, 231435 SHABQADAR SHABQADAR.

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address

City X: Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address

City: Email: akhoonzada5@gmail.com

ATTN: [Signature]



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Dist. Govt. KP-Provincial
District Accounts Office GHALANAI
Monthly Salary Statement (July-2023)



Personal Information of Mr INAMULLAH AKHOONZADA d/w/s of KIFAYATULLAH
Personnel Number: 00399101 CNIC: 1710116160507 NTN:
Date of Birth: 04.11.1987 Entry into Govt. Service: 15.03.2008 Length of Service: 15 Years 04 Months 018 Days

Employment Category: Active Temporary
Designation: ACCOUNTS ASSISTANT 80990159-DISTRICT GOVERNMENT KHYBE
DDO Code: MG6057-District Population Welfare Office Mohmand
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: IV.JM.MND.4775 GPF Interest applied GPF Balance: 303,039.00 (provisional)
Vendor Number: 30484617 - INAM ULLAH AKHUNZADA
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	57,450.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	3,500.00	2148	15% Adhoc Relief All-2013	860.00
2199	Adhoc Relief Allow @10%	555.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	5,573.00	2347	Adhoc Rel Al 15% 22(PS17)	5,573.00
2378	Adhoc Relief All 2023 35%	20,107.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-1,960.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-2,214.00	3914	Education (ROP)	-11,688.00
3915	Health (ROP)	-10,000.00	4004	R. Benefits & Death Comp	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	150,000.00	-7,500.00	7,500.00

Deductions - Income Tax

Payable: 26,564.00 Recovered till JUL-2023: 2,214.00 Exempted: 0.31- Recoverable: 24,350.37

Gross Pay (Rs.): 107,709.00 Deductions: (Rs.): -38,512.00 Net Pay: (Rs.): 69,197.00

Payee Name: INAMULLAH AKHOONZADA
Account Number: 7549-0
Bank Details: NATIONAL BANK OF PAKISTAN, 231435 SHABQADAR SHABQADAR.

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: akhoonzada5@gmail.com

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Dist. Govt. KP-Provincial
District Accounts Office GHALANAI
Monthly Salary Statement (August-2023)



Personal Information of Mr INAMULLAH AKHOONZADA d/w/s of KIFAYATULLAH

Personnel Number: 00399101 CNIC: 1710116160507 NTN:
Date of Birth: 04.11.1987 Entry into Govt. Service: 15.03.2008 Length of Service: 15 Years 05 Months 018 Days

Employment Category: Active Temporary

Designation: ACCOUNTS ASSISTANT 80990159-DISTRICT GOVERNMENT KHYBE

DDO Code: MG6057-District Population Welfare Office Mohmand

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A C No: IV.JM.MND.4775 GPF Interest applied GPF Balance: 315,499.00 (provisional)

Vendor Number: 30484617 - INAM ULLAH AKHUNZADA

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	57,450.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	3,500.00	2148	15% Adhoc Relief All-2013	860.00
2199	Adhoc Relief Allow @ 10%	555.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	5,573.00	2347	Adhoc Rel Al 15% 22(PS17)	5,573.00
2378	Adhoc Relief All 2023 35%	20,107.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-4,960.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-2,214.00	3914	Education (ROP)	-11,688.00
3915	Health (ROP)	-10,000.00	4004	R. Benefits & Death Comp:	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	150,000.00	-7,500.00	0.00

Deductions - Income Tax

Payable: 26,564.00 Recovered till AUG-2023: 4,428.00 Exempted: 0.40 Recoverable: 22,136.40

Gross Pay (Rs.): 107,709.00 Deductions: (Rs.): -38,512.00 Net Pay: (Rs.): 69,197.00

Payee Name: INAMULLAH AKHOONZADA

Account Number: 7549-0

Bank Details: NATIONAL BANK OF PAKISTAN, 231435 SHABQADAR SHABQADAR,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: akhoonzada5@gmail.com

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Personal Information of Mr INAMULLAH AKHOONZADA d/w/s of KIFAYATULLAH

Personnel Number: 00399101

CNIC: 1710116160507

NTN:

Date of Birth: 04.11.1987

Entry into Govt. Service: 15.03.2008

Length of Service: 15 Years 06 Months 017 Days

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Employment Category: Active Temporary

Designation: ACCOUNTS ASSISTANT

80990159-DISTRICT GOVERNMENT KHYBE

DDO Code: MG6057-District Population Welfare Office Mohnand

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No: IV.JLMND.4775 GPF Interest applied

GPF Balance:

320,459.00 (provisional)

Vendor Number: 30484617 - INAM ULLAH AKHUNZADA PK71NBPA1435004109832760

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 16

Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	57,450.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	3,500.00	2148	15% Adhoc Relief All-2013	860.00
2199	Adhoc Relief Allow @10%	555.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	5,573.00	2347	Adhoc Rel Al 15% 22(PS17)	5,573.00
2378	Adhoc Relief All 2023 35%	20,107.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-4,960.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-2,214.00	3914	Education (ROP)	-11,688.00
3915	Health (ROP)	-10,000.00	4004	R. Benefits & Death Comp:	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 26,563.94 Recovered till SEP-2023: 6,642.00 Exempted: 0.37- Recoverable: 19,922.31

Gross Pay (Rs.): 107,709.00 Deductions: (Rs.): -31,012.00 Net Pay: (Rs.): 76,697.00

Payee Name: INAMULLAH AKHOONZADA

Account Number: 7549-0

Bank Details: NATIONAL BANK OF PAKISTAN, 231435 SHABQADAR SHABQADAR.

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City X

Domcile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: akhoonzada5@gmail.com

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Dist. Govt. KP-Provincial
District Accounts Office GHALANAI
Monthly Salary Statement (October-2023)



Personal Information of Mr INAMULLAH AKHOONZADA d/w/s of KIFAYATULLAH

Personnel Number: 00399101 CNIC: 1710116160507 NTN:
Date of Birth: 04.11.1987 Entry into Govt. Service: 15.03.2008 Length of Service: 15 Years 07 Months 018 Days

Employment Category: Active Temporary

Designation: ACCOUNTS ASSISTANT 80990159-DISTRICT GOVERNMENT KHYBE

DDO Code: MG6057-District Population Welfare Office Mohmand

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: IV.JM.MND.4775 GPF Interest applied GPF Balance: 325,419.00 (provisional)

Vendor Number: 30484617 - INAM ULLAH AKHUNZADA PK71NBPA1435004109832760

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	57,450.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	3,500.00	2148	15% Adhoc Relief All-2013	860.00
2199	Adhoc Relief Allow @10%	555.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	5,573.00	2347	Adhoc Rel Al 15% 22(PS17)	5,573.00
2378	Adhoc Relief All 2023 35%	20,107.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-4,960.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-2,214.00	3914	Education (ROP)	-11,688.00
3915	Health (ROP)	-10,000.00	4004	R. Benefits & Death Comp:	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 26,563.88 Recovered till OCT-2023: 8,856.00 Exempted: 0.52 Recoverable: 17,708.40

Gross Pay (Rs.): 107,709.00 Deductions: (Rs.): -31,012.00 Net Pay: (Rs.): 76,697.00

Payee Name: INAMULLAH AKHOONZADA

Account Number: 7549-0

Bank Details: NATIONAL BANK OF PAKISTAN, 231435 SHABQADAR SHABQADAR.

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: akhoonzada5@gmail.com

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Personal Information of Mr INAMULLAH AKHOONZADA d/w/s of KIFAYATULLAH
Personnel Number: 00599101 CNIC: 1710116160507 NTN:
Date of Birth: 04.11.1987 Entry into Govt. Service: 15.03.2008 Length of Service: 15 Years 08 Months 017 Days

Employment Category: Active Temporary
Designation: ACCOUNTS ASSISTANT 80990159-DISTRICT GOVERNMENT KHYBE
DDO Code: MG6057-District Population Welfare Office Mulkmand
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: IV.JM.MND.4775 GPF Interest applied GPF Balance: 336,859.00 (provisional)
Vendor Number: 30484617 - INAM ULLAH AKHUNZADA PK71NBPA1435004109832760
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 13

Wage type	Amount	Wage type	Amount
0001 Basic Pay	57,450.00	1101 House Rent Allowance 45%	4,091.00
1210 Convey Allowance 2005	5,000.00	1300 Medical Allowance	1,500.00
1528 Unattractive Area Allow	3,500.00	2148 15% Adhoc Relief All-2013	860.00
2199 Adhoc Relief Allow @ 10%	555.00	2315 Special Allowance 2021	3,500.00
2341 Dispr. Red All 15% 2022KP	5,573.00	2347 Adhoc Rel Al 15% 22(PS17)	5,573.00
2378 Adhoc Relief All 2023 35%	20,107.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3016 GPF Subscription	-4,960.00	3501 Benevolent Fund	-1,500.00
3609 Income Tax	-2,214.00	3914 Education (ROP)	-11,688.00
3915 Health (ROP)	-10,000.00	4004 R. Benefits & Death Comp.	-650.00
6075 Adj GPF	-6,480.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 26,563.81 Recovered till NOV-2023: 11,070.00 Exempted: 0.55- Recoverable: 15,494.36

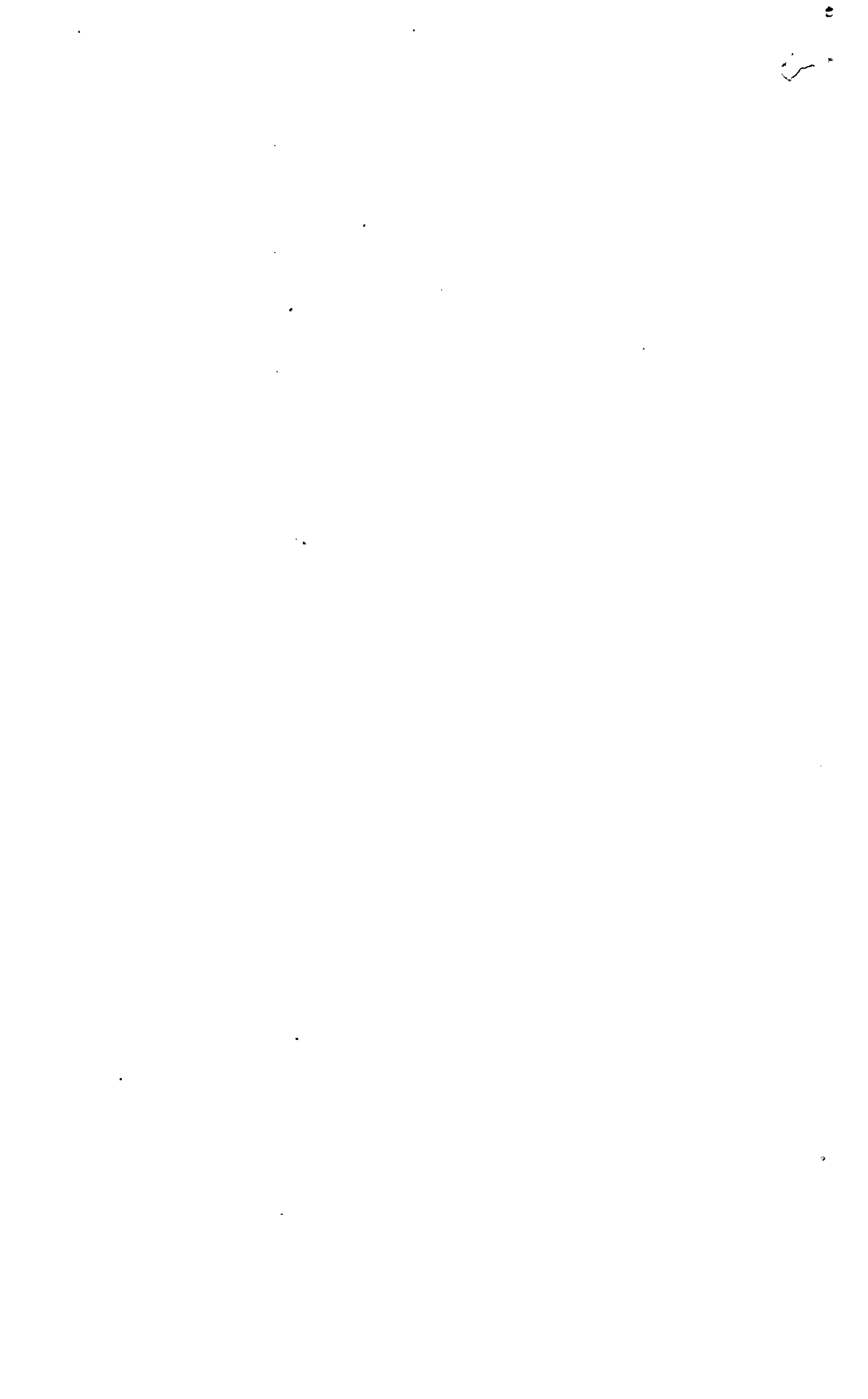
Gross Pay (Rs.): 107,709.00 Deductions: (Rs.): -37,492.00 Net Pay: (Rs.): 70,217.00

Payee Name: INAMULLAH AKHOONZADA
Account Number: 7549-0
Bank Details: NATIONAL BANK OF PAKISTAN, 231435 SHABQADAR SHABQADAR.

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address: City: Email: akhoonzada5@gmail.com

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Dist. Govt. KP-Provincial
District Accounts Office GHALANAI
Monthly Salary Statement (December-2023)



Personal Information of Mr INAMULLAH AKHOONZADA d/w/s of KIFAYATULLAH

Personnel Number: 00399101 CNIC: 1710116160507 NTN:
Date of Birth: 04.11.1987 Entry into Govt. Service: 15.03.2008 Length of Service: 15 Years 09 Months 018 Days

Employment Category: Active Temporary

Designation: ACCOUNTS ASSISTANT 80990159-DISTRICT GOVERNMENT KHYBE

DDO Code: MG6057-District Population Welfare Office Mohmand

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: IV.JM.MND.4775 GPF Interest applied GPF Balance: 341,819.00 (provisional)

Vendor Number: 30484617 - INAM ULLAH AKHUNZADA PK71NBPA1435004109832760

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 14

Wage type		Amount	Wage type		Amount
0001	Basic Pay	59,710.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	3,500.00	2148	15% Adhoc Relief All-2013	860.00
2199	Adhoc Relief Allow @10%	555.00	2315	Special Allowance 2021	3,500.00
2341	Dispr. Red All 15% 2022KP	5,573.00	2347	Adhoc Rel Al 15% 22(PS17)	5,573.00
2378	Adhoc Relief All 2023 35%	20,107.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-4,960.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-2,496.00	3914	Education (ROP)	-11,688.00
3915	Health (ROP)	-10,000.00	4004	R. Benefits & Death Comp:	-650.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 28,540.88 Recovered till DEC-2023: 13,566.00 Exempted: 0.22 Recoverable: 14,975.10

Gross Pay (Rs.): 109,969.00 Deductions: (Rs.): -31,294.00 Net Pay: (Rs.): 78,675.00

Payee Name: INAMULLAH AKHOONZADA

Account Number: 7549-0

Bank Details: NATIONAL BANK OF PAKISTAN, 231435 SHABQADAR SHABQADAR,

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: akhoonzada5@gmail.com

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ANNEXURE - D

1421
18/9/23

To

The District Population Welfare Officer,
Mohmand.

Subject: APPLICATION AGAINST THE DEDUCTION FROM
MONTHLY SALARY BY DISTRICT ACCOUNTS OFFICER
FROM THE MONTH OF MAY 2023

Sir,

It is stated that I am working as Accounts Assistant in your office. I am working with my devotion and has performed duty is such a way that the office has brought in a better position.

Now, from the month of May 2023 deduction of Rs. 10,000/- has been started from my monthly salary by District Accounts Officer without information to me.

It is, therefore, requested that to my matter of deduction from my salary be kindly handled with DAO so that the deduction be stopped.

Yours Obediently,

Inamullah Akhondzada,
Account Assistant,
District Population Office,
Mohmand

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OFFICE OF THE
DISTRICT POPULATION WELFARE OFFICER
MOHMAND

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ANNEXURE - E

F.No.1(1) 2023/Account/ 1467-89

Dated: 25/10/2023

To

The District Account Officer,
Mohmand at Ghallani.

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.

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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 arear 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.Arear 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 of payments is hereby attached (Anx-15).Copies of Source II attached (Anx-16)

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

Amount of 168000 detail arear 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.

Gh. Shah.

District Population Welfare Officer,
Mohmand.

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(POWER OF ATTORNEY)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2024

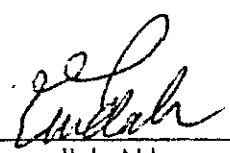
INAMULLAH AKHONZADA VS GOVT. OF KP& OTHERS

I, Inamullah Akhonzada 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.

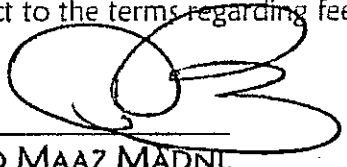
AND to do all acts legally necessary to manage and conduct the said case in all respects whether herein specified or not, as may be proper and expedient.

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 
(Inamullah Akhonzada)

Accepted subject to the terms regarding fees:


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

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