

554/2019

02.09.2019

Counsel for the appellant and Addl. AG for the respondents present.

No representative of the respondents is in attendance. Learned AAG is required to ensure attendance of representatives of the respondents and submission of written reply/comments on the next date.

Adjourned to 27.09.2019 before S.B.


Chairman

27.09.2019

Counsel for the appellant present.

An application for withdrawal of instant appeal has been submitted on the ground that the pension of appellant has been released, as such, his grievance stands redressed.

Dismissed as withdrawn. File be consigned to record room.


Chairman

Announced:
27.09.2019

13.06.2019

Counsel for the appellant present.

Contends that the appellant had applied for retirement on medical grounds due to her poor health. She was subjected to Standing Medical Board on 15.09.2018 whose opinion was to the effect that she was unfit for government job. It was recommended that the appellant may be boarded out on medical grounds as she was permanently incapacitated. Despite, the case of appellant for retirement on medical ground was declined on 22.01.2019. Where-after she preferred departmental appeal on 11.02.2019 which was also rejected on 17.04.2019. It was also the argument of learned counsel that the denial of requisite retirement jeopardized valuable service rights of the appellant and was against the rules.

In view of the available record and arguments of learned counsel, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 29.07.2019 before S.B.

Appellant Deposited
Security & Process Fee

27/6/19


Chairman

29.07.2019

Counsel for the appellant and Mr. Usman Ghani,
District Attorney for respondents present.

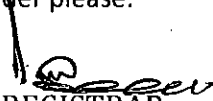

Notices be issue to the respondents for submission of
written reply/comments on 02.09.2019 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 554/2019

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 30/04/2019 | <p>The appeal of Mr. Gul Mar Khan presented today by Mr. Javed Ali Muhammadzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 30/4/19</p> |
| 2- | 02/05/19. | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13/06/19</u></p> <p style="text-align: right;"> CHAIRMAN</p> |

**BEFORE THE HONOURABLE
SERVICE TRIBUNAL, KP PESHAWAR**

Service Appeal No. 554/2019

Gul Mar Khan

(Appellant)

VERSUS

The Government of KP through Secretary Finance, Civil Secretariat,
Peshawar and others

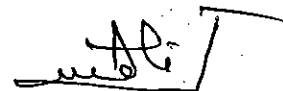
(Respondents)

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| 4 | Copy of Regulation Act | C | 12-13 |
| 5 | Copy of Retirement Order | D | 14 |
| 6 | Copy of Pension Application and Last Pension Slip | E | 15-18 |
| 7 | Copy of Departmental Appeal | F | 19 |
| 8 | Wakalat Nama | | 20 |

Appellant

Through



Javed Ali Mohammadzai
Advocate High Court,
Peshawar
Cell No. 0333-9064763

Dated: 26.04.2019

(1)

BEFORE THE HONOURABLE
SERVICE TRIBUNAL, KP PESHAWAR

Service Appeal No. 554 /2019

Khyber Pakhtunkhwa
Service Tribunal

Gul Mar Khan S/o Khaista Khan (Ex-Chowkidar)

Diary No. 680

R/o Garhi Sikandar Khan, Tehsil & District Peshawar

Dated 30/4/2019

(Appellant)

V E R S U S

- 1) The Government of KP through Secretary Finance, Civil Secretariat, Peshawar
- 2) The Accountant General, Khyber Pakhtunkhwa Peshawar
- 3) The Executive Engineer, Public Health Engineering Division, Peshawar

(Respondents)

Appeal Under Section 4 of the Service Tribunal

Filed to-day Act 1974, against the illegal act and action of
Registrar, stoppage / refusal of grant of pension benefits
of the appellant by respondents.

Prayer:

On acceptance of this appeal, the impugned act and action of respondents may kindly be declared as illegal, against the law and rule on subject and they may also be directed to release the pension benefits to appellant forthwith.

Respectfully Sheweth,

Matrix of the case given rise to the instant appeal are under:

- 1) That the appellant was initially appointed as Chowkidar in Public Health Engineering Department KP Peshawar on 30.01.1993 and posted at Water Supply Scheme Garhi Sikandar Khan, Peshawar. (Copy of appointment letter and service book is attached as Annexure A & B)
- 2) That vide notification No. B01/1-Z/2008-09 the service of the appellant along with others was brought on regular side w.e.f. 01.07.2008 and convert to regular civil servant. This fact is also reflected form the entries of service book. (Copy of the regulation order is attached as Annexure C)
- 3) That vide office order No. 23 dated 26.08.2011, the appellant was retired from Govt. Service after on attaining the age of superannuation w.e.f. 01.07.2011. (Copy of retirement order is attached as Annexure D)
- 4) That being so, the appellant submitted his pension case to respondent / department which was sanctioned and the appellant received his pension till March 2014. (Copy of pension application and last pension slip is attached as Annexure E)
- 5) That thereafter, the pension of the appellant was stopped / withheld with any legal reasons and written order.
- 6) That being so, the appellant time and again approached the respondent No. 3 for redress of his grievances but he

was told by the respondent / department orally that he is not entitled for grant of pension benefits.

- 7) That last on 24.01.2019 the appellant preferred department appeal to respondent No. 3 for release of pension but till now no response hence this appeal on following grounds. (Copy of departmental appeal is attached as Annexure F)

GROUNDS

- a) That the impugned act and action of respondents in respect of stoppage / refusal of grant of pension benefits of the appellant is illegal, without lawful authority, in consent with law and rules on subject.
- b) That the appellant was regular and permanent employee of public health engineering department and is entitled to pensionary benefits on his retirement which was illegal and without any justification denied.
- c) That the act and action of withholding / stoppage of pension benefits is perverse and against the settled principle of law and justice.
- d) That in the similar cases, the co-employees of the appellant has been allowed pension benefits by the respondents. And refusing the same treatment for the appellant is thus illegal and based on malafide on the part of respondents.

e) That being civil servant, the appellant Under Section 19(2) KPK Civil Servant, 1972, is entitled to receive pension benefits.

It is, therefore, humbly requested that on acceptance of this appeal, the impugned act and action of respondents may kindly be declared as illegal, against the law and rule on subject and they may also be directed to release the pension benefits to appellant forthwith.



Appellant

Through

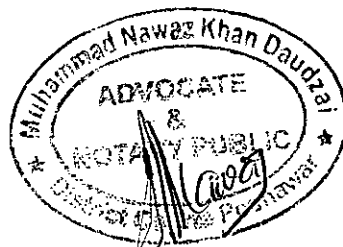
Javed Ali Mohammadzai
Advocate High Court,
Peshawar

Dated: 26.04.2019

AFFIDAVIT

I, **Gul Mar Khan** S/o Khaista Khan (Ex-Chowkidar) R/o Garhi Sikandar Khan, Tehsil & District Peshawar, do hereby solemnly affirm and declare on Oath that the contents of instant "Service Appeal" are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.

ATTESTED



29/4/19



DEPONENT

CNIC No. 17301-472273-5

Mr. Gul Har Khan S/O Khaista Khan,
Village Garhi Sikandar Khan.

(5)

Ann-A

Subject:-
Reference:-

ESTABLISHMENT OPERATIONAL STAFF.

- 1) Finance Department NWFP., Peshawar letter No. BI/2-1/92-93/FD, dated 4.11.1992.
- 2) Chief Engineer, PHEE, NWFP., Peshawar letter No. 300372-AB/8, dated 24-12-1992.

As selected by selection committee you are hereby appointed as Chowkidar on W.S. Scheme Garhi Sikandar Khan, Peshawar (Distt: ~~Nowshera~~) with effect from the actual date of arrival in PHE Division Peshawar @ Rs.1200/- per month fixed.

- 1/ The post is purely temporary.
- 2/ Your services can be terminated at any time without assigning any reasons.
- 3/ You will be liable to serve any where in PHE Division Peshawar.
- 4/ You will have to furnish a declaration in writing that you have not ~~to~~ already been dismissed from Govt. service, or any autonomous body of agency.
- 5/ You will have to appear before the Civil Surgeon and produce Medical fitness certificate from him.
- 6/ The post is purely temporary on contract basis and will be renewable on yearly basis.

If you accept the appointment on the terms and conditions specified above you should report for the duty to the Sub Divisional Officer, P.H. Engg: Sub Divn: Nowshera, within (14) days of the issue of the order failing which the order shall stand cancelled automatically.

Executive Engineer
Public Health Engg: Division
Peshawar.

No. E-5+A/14 / Dated Pesh: the 30/1/93
Copy forwarded to :-

- 1/ The Superintending Engineer, Public Health Engg: Circle Peshawar.
- 2/ The Accountant General, NWFP., Peshawar.
- 3/ The Chairman, Distt: Development Advisory Committee Nowshera. For information please.
- 4/ Arbab Saifur Rehman, Deputy, Speaker Peshawar, for information with reference to his recommendation with ref. to his recommendation dated 21-1-93 & 28-1-93.
- 5/ Sub Divisional Officer, P.H. Engg: Sub Divn: ~~Nowshera~~ Peshawar, The actual date of arrival required vide item No.6 above.
- 6/ Divisional Accountant (Local). For information please.

Executive Engineer
Public Health Engg: Division
Peshawar.

ATTACHED

(6)

Ann-B

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: Gul Mus Khan

2. Race: Muslim


3. Residence: Village Gushki Sirkandaz Peshawar
P.O. University Fakhri Distt. Peshawar

4. Father's name and residence: Khaista Khan


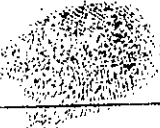
5. Date of birth by Christian era as nearly as can be ascertained: 1-7-1951


6. Exact height by measurement: 5-6"


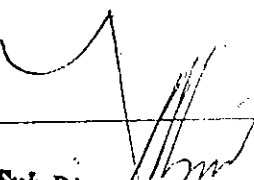
7. Personal marks for Identification: Scar on Fore head

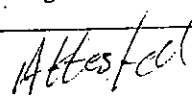
8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.  Attested


Little Finger  Ring Finger 

Middle Finger  Fore Finger  *Subd. T*

Thumb  **ATTESTED**

9. Signature of Government Servant  

10. Signature and Designation of the Head of the Office, or other Attesting Officer.  **Sub Divisional Officer
Public Health Engineering
Sub Division No. II Peshawar**


**Sub Divisional Officer
Public Health Engg:
Sub Division No. I Peshawar**

71

| 9 Signature and Name of the head of the office or other attesting officer in columns 1 to 8 | 10 Date of termination of appoint- ment | 11 Reason of termination (such as promotion, transfer, dismissal, etc.) | 12 Signature of the head of the office or other attesting Officer | 13 Nature and dura- tion of leave taken | 13 Leave | | 14 Signature of the head of the office or other attesting officer | 15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant |
|--|---|--|--|---|--|---------------------------------|---|--|
| | | | | | Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government | | | |
| | | | | | Period | Government to which debitale | | |
| <p>Appointed as Chowkidar on water Supply Scheme Gashi Silkandar Khan Distt. Peshawar vide o/o no. 72 dt. 30-1-1993 and Reported Arrival on 31-1-1993 (F.W).</p> | | | | | <p>✓</p> | | <p><i>[Signature]</i> Sub Divisional Officer Public Health Engineering Sub Division No. II Peshawar</p> | |
| <p><i>[Signature]</i> Attested</p> | | | | | <p><i>[Signature]</i></p> | | <p>Service Verified for the Period From 31-1-93 To 31-5-93 From: Atroll & Pay bill of this office</p> | |
| <p><i>[Signature]</i> Sub Divisional Officer Public Health Engg: S/Divn: No. I Peshawar</p> | | | | | <p><i>[Signature]</i> Sub Divisional Officer Public Health Engineering Sub Division No. I Peshawar</p> | | | |
| <p>ATTESTED</p> | | | | | <p><i>[Signature]</i> Sub Divisional Officer Public Health Engineering Sub Division No. I Peshawar</p> | | <p>Service Verified for the Period From 1-6-93 To 31-5-93 From: Atroll & Pay bill of this office</p> | |
| <p><i>[Signature]</i> Attested</p> | | | | | <p><i>[Signature]</i> Sub Divisional Officer Public Health Engineering Sub Division No. I Peshawar</p> | | <p>1-6-94 31-5-94</p> | |
| <p><i>[Signature]</i> Sub Divisional Officer Public Health Engg: S/Divn: No. I Peshawar</p> | | | | | <p><i>[Signature]</i></p> | | <p>1-6-95 31-5-95</p> | |

8/

30-6-11

| 9 | 10 | 11 | 12 | 13 | | 14 | 15 |
|--|----|----|----|------------------------------------|---|---|--|
| Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8 | | | | Leave | | Signature of the head of the office or other attesting officer | |
| Date of termination of appointment | | | | 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 | | Reference to any recorded punishment or censure, or reward or praise of the Government Servant |
| | | | | | Period | Government to which debitable | |
| <p>Pay fixed @ B4022/PM. w.e.f. 1-11-2006 vide Genl. N.W.F.P. Finance Deptt Letter No-101/1-24700506/PP dt 21-11-2006.</p> | | | | | | <p>Service verified from the period From 1-12-2005 to 31-10-2006 from the accounts roll pay bills of this office.</p> | |
| <p>Assistant District Officer Water & Sanitation Works & Services Department City District Peshawar</p> | | | | | | <p>Assistant District Officer Works & Services Department City District Peshawar</p> | |
| <p>Converted from Fix Pay into Regular cadre in BPS-2 vide Finance Deptt. Letter no B01/PP/1-22 dt. 30/7/2008</p> | | | | | | | |
| <p>Assistant District Officer-I Water & Sanitation Works & Services Department City District Peshawar</p> | | | | | | <p>Assistant District Officer Water Supply & Sanitation PESHAWAR</p> | |
| <p>Drawn Rs 17970/- Pay & Allow. w.e.f. 1/7/08 to 31/12/08 vide I.R. No 155 dt 19/01/09.</p> | | | | | | | |
| <p>Assistant Accounts Officer District Accounts Officer Peshawar</p> | | | | | | | |
| <p>Sub-District Officer Public Health Engg. S/Division Peshawar</p> | | | | | | <p>2008 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P. PESHAWAR PAY FIXED IN THE AUGUST REVISED BASIC PAY SCALES OF RS 2870-90-5670 AT RS 4410/- P.M. W.E.F. 1-07-2008 With next increment on 1-12-2008 Accounts Officer Pay Fixation Party N.W.F.P. Peshawar.</p> | |

ATTENDED

Attached

Sub-District Officer
Public Health Engg.
S/Division Peshawar

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 "Pay" | Date of Appointment | Signature of Government Servant |
| 3025-100-3083 | B.P.S. I | | | | | | |
| 2970-90-5670 | B.P.S. I | | 4599/- P.M. | | | 1/12/29 | [Signature] |
| " | | | 4680/- P.M. | | | 1/12/29 | [Signature] |
| Attested | | | | | | | |
| [Signature] | | | | | | | |
| Attested | | | | | | | |
| [Signature] | | | | | | | |
| Consolidated Service ref. 31/1/1993 | | | | | | | |
| to 30.6.2011 verified | | | | | | | |
| ATTESTED | | | | | | | |
| [Signature] | | | | | | | |

Public Health Officer
 Government of India
 Punjab

10

| 10 | 11 | 12 | 13 | | 14 | 15 | |
|----|----|---|--|---|-------------------------------|---|--|
| | | | Nature and duration of leave taken | Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government | | | |
| | | | | Period | Government to which debitible | | |
| | | | Approved Leave granted. | | | | |
| | | Sub-Divisional Officer Public Health Engineering Sub-Division No. 1 Peshawar | | | | Service verified from 1-12-08 to 30/11/09 for P/Health. | |
| | | | | | | Sub-Divisional Officer Public Health Engineering Sub-Division No. 1 Peshawar | |
| | | | Approved Leave granted. | | | | |
| | | Sub-Divisional Officer Public Health Engineering Sub-Division No. 1 Peshawar | | | | Service verified from 1/12/2009 to 30/11/2010 for P/Health. | |
| | | Attache Sub-Divisional Officer Public Health Engg. Sub-Division No. 1 Peshawar | | | | Sub-Divisional Officer Public Health Engineering Sub-Division No. 1 Peshawar | |
| | | | | | | Service verified from 1/12/2010 to 30/6/2011. | |
| | | | | | | Sub-Divisional Officer Public Health Engineering Sub-Division No. 1 Peshawar | |
| | | | The official returned from service in PHE 1/7/2011 F/Health Executive Engg. PHE Peshawar vide order 2300 dt. 26/8/11 | | | | |

ATTACHED

Attache

Sub-Divisional Officer
Public Health Engineering
Sub-Division No. 1
Peshawar

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 Art. 371 C.S.R. | Pay in substantive Post | Additional Pay for officiating | Other emolument falling under the term "Pay" | Date of Appointment | Signature of Government |
| upgraded from BPS-7 to BPS-2 on 1-7-2007. | | | | | | | |
| <u>Revised Entry</u> | | | | | | | |
| B-1 2150-65-4100 | | | Rs 3060/Post | | | 12/2006 | |
| B-1 2475-75-4725 | | | Rs. 3525/- Post | | | 7/2007 | |
| B-1 2530-85-4995 (Due to upgrading) | | | Rs. 3557 Post | | | 7/2007 | |
| | | Sp. Increment | Rs. 3635/Post | | | 9/2007 | |
| | | | Rs. 3720/- Post | | | 12/2007 | |
| B-2 3035-100-6035 | | | Rs 4435/Post | | | 7/2008 | |
| | | | Rs. 4535/- Post | | | 12/2008 | |
| | | | Rs. 4635/- Post | | | 12/2009 | |
| | | | Rs. 4735/- Post | | | 12/2010 | |

Office of the Accountant General
 Khyber Pakhtun Khwa Peshawar
 Pay Fixed in the Revised Basic Pay Scales
 BPS-7 w.e.f. 01-07-2007
 Pay Fixed @ Rs. 3035 100 6035 B-1
 BPS-8 w.e.f. 01-07-2008
 Pay Fixed @ Rs. 4435/- B-2
 BPS-9 w.e.f. 01-07-2011
 Pay Fixed @ Rs. 4735/- B-2
 Date of Next Increment 1-7-2011

Handwritten signatures and stamps, including a large 'AT' stamp.

Accountant General
 Khyber Pakhtun Khwa Peshawar

12

Ann - 5

THE ³[KHYBER PAKHTUNKHWA]
EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2009.
(⁴[KHYBER PAKHTUNKHWA] ACT NO. XVI OF 2009)

[First published after having received the assent of the Governor of the ⁵[Khyber Pakhtunkhwa] in the Gazette of ⁶[Khyber Pakhtunkhwa] (Extraordinary), dated the 24th October, 2009]

AN
ACT

to provide for the regularization of the services of certain employees appointed on adhoc or contract basis.

WHEREAS it is expedient to provide for the regularization of the services of certain employees appointed on adhoc or contract basis, in the public interest, for the purposes hereinafter appearing;

It is hereby enacted as follows:-

1. **Short title and commencement.**---(1) This Act may be called the ⁷[Khyber Pakhtunkhwa] Employees (Regularization of Services) Act, 2009.

(2) It shall come into force at once.

2. **Definitions.**---(1) In this Act, unless the context otherwise requires,-

- (a) "Commission" means the ⁸[Khyber Pakhtunkhwa] Public Service Commission;
- (aa) "contract appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment;
- (b) "employee" means an adhoc or a contract employee appointed by Government on adhoc or contract basis or second shift/night shift but does not include the employees for project post or appointed on work charge basis or who are paid out of contingencies;

³Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

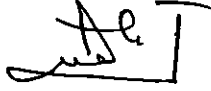
⁴Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

⁵Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

⁶Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

⁷Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

⁸Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011


ATTESTED

- (c) "Government" means the Government of the ⁹[Khyber Pakhtunkhwa];
- (d) "Government Department" means any department constituted under rule 3 of the ¹⁰[Khyber Pakhtunkhwa] Government Rules of Business, 1985, and does not include any section of a Department or an organization which is federally funded;
- (e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants; and
- (f) "post" means a post under Government or in connection with the affairs of Government to be filled in on the recommendation of the Commission.

(2) The expressions "ad hoc or contract appointment" and "civil servant" shall have the same meanings as respectively assigned to them in the ¹¹[Khyber Pakhtunkhwa] Civil Servants Act, 1973 (¹²[Khyber Pakhtunkhwa] Act No. XVIII of 1973).

3. **Regularization of services of certain employees.**---All employees including recommendees of the High Court appointed on contract or ad hoc basis and holding that post on 31st December, 2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post:

Provided that the service promotion quota of all service cadres shall not be affected.

4. **Determination of seniority.**---(1) The employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.


(2) The seniority interse of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

⁹Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

¹⁰Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

¹¹Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

¹²Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011


ATTESTED

14

Ann — D //

Office Order No. 230

Dated Peshawar the 26 /8/2011.

On Supernuation of 60-years age Mr Gul Max Khan S/O Khista Khan
Chewkidar Water Supply Scheme Ghari Sikander Khan Teh: & Distt: Peshawar,
is hereby retired from service with effect from 01.07.2011 (F/N)

in exercise of the power confirmed under sub
rules (22) of revised leave rules 1981 the official is hereby allowed
leave salary of 180 days in lieu of leave preparatory to retirement.

EXECUTIVE ENGINEER
PUBLIC HEALTH ENGINEERING DIVISION
PESHAWAR.

Endst: - No. E-5-A/ 03

Dated Peshawar the 26 /8/2011.

CC: #

1. The Accountant General (KPK) Peshawar.
2. The Divisional accounts Officer (Local)
3. The Sub Divisional Officer (PHE) Sub Division
No. II Peshawar.

Ali
ATTESTED

[Signature]
EXECUTIVE ENGINEER
PUBLIC HEALTH ENGINEERING DIVISION
PESHAWAR.

15

~~Ann - D~~

2

FORM 3 (PEN)

Ann - E

PART - I

(To be filled in and signed by the applicant himself/herself)

APPLICATION FOR PENSION AND/OR GRATUITY.

To

The Secretary Engineer
Public Health Engineering Division
Peshawar

Sir,

I have the honour to say that I ~~*have retired~~ ^{at 60yrs}
~~*have been permitted to retire from service~~
~~*am due to retire~~
on (date) 20/11/09

I, therefore, request that the pension/gratuity admissible under the rules may kindly be sanctioned to me.

2. I declare that I have neither applied for nor received any pension or gratuity for any portion of this service, nor shall I submit any application hereafter without quoting a reference to the application and to the orders which may be passed on.

3. Should the amount of the pension and/or gratuity granted to me be afterwards found to be in excess of that to which I am entitled under the rules, I hereby undertake to refund any such excess.

4. ~~I wish to draw~~/do not wish to draw gratuity in lieu of one fourth of my pension.

5. I wish to commute my pension to the extent of Rs. 20119/-

6. I wish to draw my pension from the District Accounts Office
/National Bank of Pakistan Branch at Peshawar (Place).

7. The following documents, duly attested, are enclosed:

- (a) Three specimen signatures of mine/two sets of my thumb and finger impressions on the prescribed form.
- (b) Three photographs of mine.

Your Obedient Servant,

Signature [Signature]
S/O [Signature]
W/O [Signature]
D/O [Signature]

Post held on the date of retirement [Signature]

[Signature]
Sub-Divisional Officer
Public Health Engineering
Sub Division No. 1
Peshawar

Date.....

*Delete in case of alternative

PENSION ROLL DATA SHEET & PENSION SLIP

16

Date of : 02.04.2019
 PPO Type: FRESH
 PPO Number: 00194016-01
 Pensioner ID: 00194016
 Pension Register No:
 Pensioner's Name: **GULMAR KHAN**
 Father / Husband name: **KHAISTA KHAN**
 Designation: CHOWKIDAR
 NIC No.: 1730117272735
 Grade / Scale : 02
 Department.Min: Works & Services
 Pensioner's Type: **SELF**
 Pension Type: SUPERANNUATION
 Date of Birth : 01.07.1951
 Date of appointment: 31.01.1993
 Date of retirement: 01.07.2011
 Date of Death:
 Date of commence : 01.07.2011
 Date of Restoration :
 Accounts office ID : PD
 Accounts office Name : Peshawar Dist.
 Federal / Province : Khyber Pakhtunkhwa
 Length of Qualifying Service : 18 years, 5 months, 1 days
 Old PPO Number :
 No. and Date of sanction of pension / Letter No. :
 and the date of the other Audit and Accounts officer authorising
 the Pension/Gratuity/Commutation
 Permanent Address: DISTRICT PESHAWAR.

Note:
 Age : 60 years .
 Last Drawn pay/Emoluments(Rs.): 4835.00
 Gross Pension(Rs.) : 2030.70
 1/4th Surrendered Portion (Rs.) :
 Commuted Portion (Rs.) : 710.75
 Net Pension (Rs.) : 3000.00
 Net Family Pension (Rs.) : 0.00
 Amount of Commutation(Rs.) : 105520.00
 With Held Amount (Rs.) : 0.00
 Life Time Arrears (Rs.) : 0.00
 Arrears Of Pension (Rs.) : 0.00
 Special Additional Pension (Rs.) : 0.00
 Commutation Percentage : 35.00
 Commutation Table value : 12.37
 Recovery on A/C of :
 Debitable to Govt : Khyber Pakhtunkhwa
 Total Net Share
 Federal : 0.00 Punjab : 0.00
 Sindh : 0.00 NWFP : 0.00
 Balochistan : 0.00 Military : 0.00
 AJK : 0.00 Autonomous : 0.00

He/She is also entitled to the following increases

| Sr. No. | Period | Increase % or amount | Increase Amount | W.E.F. |
|---------|--------|----------------------|-----------------|--------|
| 1 | 0. | Rs. 0.00 | 0.00 | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |
| 6 | | | | |
| 7 | | | | |
| 8 | | | | |
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| 11 | | | | |
| 12 | | | | |
| 13 | | | | |
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| 20 | | | | |
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| 22 | | | | |
| 23 | | | | |
| 24 | | | | |
| 25 | | | | |
| 26 | | | | |
| 27 | | | | |

Attested
ATTESTED

PENSION SLIP

Month: **March**
 Year: **2014**

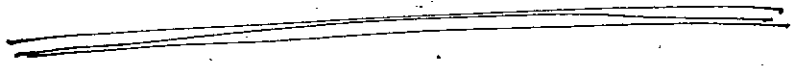
Pension roll details

| Wage Type | Wage Type Text | Amount |
|-----------|---------------------------|----------------|
| /559 | Payment | 5511.00 |
| 0100 | Monthly Pension - Self | 3000.00 |
| 0101 | Pension Increases - Self | 1761.00 |
| 1599 | Medical Allow - Pensioner | 750.00 |

Bank Details

Bank Account Number : 012060267-0
 Bank Branch : Nawan killi Bara Rd. Peshawar
 Nawan killi Bara Rd. Peshawar
 Payment Mode : ALLIED BANK LIMITED

PEN-II / 9-11 / 12-13



OFFICE OF THE
ACCOUNTANT GENERAL, KHYBER PUKHTUNKHAWA,
PESHAWAR.

No. PN- SEAL COMMTT AUTH/ G-11/2012-13/ 104

Dated

19/6/2013

To

The Drawing & Disbursing Officer,
EX: ENGINEER, PUBLIC HEALTH
PESHAWAR

17
17

Sub:- PENSION AUTH IN R/O,
MR. GULMAR KAHN EX-CHOWKIDAR

Please refer to your letter No. 230
Dated 26.05.2013 forwarding there in pension case in respect
of above named officer / official.

2. You are hereby authorized to submit a bill for Rs. 105520.00
(Rupees: ONE HUNDRED FIVE THOUSAND FIVE HUNDRED TWENTY)
at the counter of this office for issuance of cross cheque in favour
of Mr. Mrs. Miss. Mst. MR. GULMAR KAHN EX-CHOWKIDAR (Per.No :
00194016)
NIC.NO 1730117272735 on account of Commutation of pension.

Bank Name : ABL, NAWANKILLI
A/c No : 012060267-0

3. The amount involved in charged / other than charged
and debitable to the Federal Govt. under the following head
of accounts:-

| | |
|-------------------------------|-------------------------------------|
| 01 - General Administration. | A01 - Transfer payments. |
| 0112 - Fiscal administration. | A011 - Pensionary benefits. |
| 011210 - Pension. | A04102 - Commuted value of pension. |
| | A04103 - Gratuity value of pension. |

Withheld amount

Amount Payable:

Amount With Held:

Amount Paid:

105,520.00

0.00

105,520.00

2305

Recoveries

Note:- This authority letter may please be attached with the bill in original
along with the Office order/notification of retirement. Vendor No, Name of Bank
and A/c No of payee may also be recorded on the bill

Remarks:-

ACCOUNTS OFFICER (PENSION)

Copy for information to :-

Mr. Mrs. Mst. Miss. MR. GULMAR KAHN EX-CHOWKIDAR
DISTRICT PESHAWAR.

ATTESTED

ACCOUNTS OFFICER (PENSION)

18/6

18/6/2013

18



GUL MAR KHAN SO KHISTA KHAN
GHARI SIKENDAR KHAN
PO PESHAWAR UNIVERSITY
PESHAWAR 25000
KHYBER.PAKHTOONKHWA

Balance at Period Start 0.00
Branch Name: NAWA KILLI,PESHAWAR
Statement Period: 25 Oct 11 to 22 Aug 17
Account Number: 0010020445900018
Account Status: 4-Dormant
Currency: Pakistan Rupee
Account Type: Allied Basic Banking Account

| DATE | PARTICULARS | VALUE DATE | DEBIT | CREDIT | BALANCE |
|------------------------------|---------------------------|------------|-------------------|-------------------|--------------|
| | | | | 104,808.00 | 104,808.00 |
| 22 Mar 14 | Migration Entry | 22 Mar 14 | | | |
| 04 Apr 14 | Online Transfer SALARY | 04 Apr 14 | | 5,511.00 | 110,319.00 |
| 14 Apr 14 | Cash Deposit | 14 Apr 14 | | 200,000.00 | 310,319.00 |
| 14 Apr 14 | Cash Withdrawal 01080672 | 14 Apr 14 | 5,500.00 | | 304,819.00 |
| 12 May 14 | Cash Withdrawal 01080673 | 12 May 14 | 50,000.00 | | 254,819.00 |
| 24 Jun 14 | Cash Withdrawal 01080674 | 24 Jun 14 | 30,000.00 | | 224,819.00 |
| 09 Jul 14 | Cash Withdrawal 01080675 | 09 Jul 14 | 5,500.00 | | 219,319.00 |
| 05 Aug 14 | Cash Withdrawal 01080676 | 05 Aug 14 | 19,000.00 | | 200,319.00 |
| 19 Aug 14 | FED Deduction | 19 Aug 14 | | 4.83 | 200,314.17 |
| 19 Aug 14 | Account Statement Charges | 19 Aug 14 | | 30.17 | 200,284.00 |
| 19 Aug 14 | Cash Withdrawal 01080677 | 19 Aug 14 | 50,000.00 | | 150,284.00 |
| 08 Sep 14 | Cash Withdrawal 01080678 | 08 Sep 14 | 50,000.00 | | 100,284.00 |
| 14 Oct 14 | Cash Withdrawal 01080679 | 14 Oct 14 | 50,000.00 | | 50,284.00 |
| 09 Dec 14 | Cash Withdrawal 01080680 | 09 Dec 14 | 40,000.00 | | 10,284.00 |
| 17 Sep 15 | Cash Withdrawal 01471516 | 17 Sep 15 | 5,000.00 | | 5,284.00 |
| 03 Dec 15 | Cash Withdrawal 01471517 | 03 Dec 15 | 3,000.00 | | 2,284.00 |
| 24 Feb 16 | Cash Withdrawal 01471518 | 24 Feb 16 | 2,200.00 | | 84.00 |
| TOTAL DEBIT/CREDITS | | | 310,235.00 | 310,319.00 | 84.00 |
| CLOSING BALANCE | | | | | 0.00 |
| TOTAL WITHHOLDING TAX | | | | | |

ATTESTED

*REVE- Reversal Entry
This is a computer-generated statement, issued without any alteration, and does not require any signature.

محکمہ خلیفہ اہل بیت (ع) ایگزیکٹو ایجنسی کے نام سے

محکمہ خلیفہ اہل بیت (ع) کے بند کرنے پر پیشینہ ایجنسی

خبر عالیہ کے لیے حسب ذیل مضمون ہے۔

1۔ یہ کہ ایجنسی سال 1993ء کے حکم پبلک پبلسٹی ایجنسی کے تحت
ڈویژن نمبر 250000 کے طور پر رجسٹرڈ ہوئی ہے۔
2۔ یہ کہ سال 2008ء کو ایجنسی کی سروس ریگولر کیا
گیا ہے۔

3۔ یہ کہ سال 2011ء سے ایجنسی کے سالانہ پر
ملازمت سے ریٹائر ہوئی۔

4۔ یہ کہ ریٹائرمنٹ کے بعد باقاعدہ طور پر ایجنسی کی
پیشینہ جاری ہوئی۔ اور ایجنسی سال 2014ء
کے لیے پیشینہ وصول کرتا رہا۔

5۔ یہ کہ بعد میں بغیر کسی قانونی حوالہ کی ایجنسی کی
پیشینہ بند کر دیا گیا ہے۔ یہ ~~مقررہ~~ آئین ایجنسی
دوسرے سابقہ باقاعدہ طور پر ایجنسی پیشینہ
وصول کر رہے ہیں۔

6۔ یہ کہ ایجنسی کے حکم نذا کا ریگولر ملازم تھا۔ اور
پیشینہ اس کا قانونی حق ہے

لہذا استدعا ہے کہ ایجنسی کی پیشینہ فوری طور
پر جاری فرمایا جائے۔

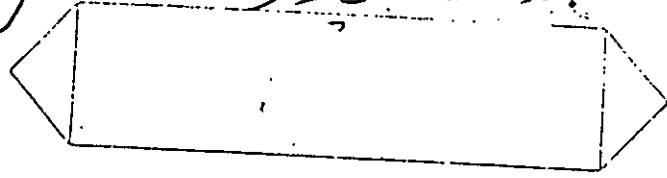
مورخہ 05-1-2019ء

ایجنسی کے حکم خان ولد خاتونہ خانم سابقہ ریگولر



Attested

بعد الت خیر خواہ مہر سکس ٹریبونل لداخہ



سوری 26 اپریل 2019ء پنجاب
مقدمہ عدالت
عنوان
جرم
نام - ایملہ
ڈی جی خان

گمل مرخالت نیم حکومت

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیردی و جواب دہی وکل کاروائی متعلقہ
آن مقام کیلئے جاوید علی محمد زئی ایڈووکیٹ لداخہ
مقرر کر کے اتر آیا جاتا ہے کہ صاحب مہر سکس و مقدمہ میں کل کاروائی کا کاٹل اختیار ہوگا۔
وکیل صاحب پر انہی ناموں سے اقرار و ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دہی اور
بصورت پٹرنی کرنے اجراء اور وصولی چیک اور پید اور عرضی دعوی اور درخواست بہ قسمتی تصدیق
زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیردی یا ڈگری یا پٹرنی یا پٹرنی کی برآمدگی
اور منسوخی نیز ڈگری کرنے میں نگرانی و نظر ثانی و پیردی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بھانے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا سامنتہ پر اخت منظور قبول ہوگا دوران مقدمہ میں جو فرچہ پر جان التوائے مقدمہ سے
سبب سے دہوگا۔ کوئی تاریخ جتنی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گئے۔ کہ پیردی مذکور کریں۔ لہذا کالت نامہ لکھد یا کہ سند ہے۔

ایملہ
ڈی جی خان



Attested & accepted
ایملہ

2019ء 26 اپریل

العراق
مقام
کے لئے منظور ہے۔