BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL <u>PESHAWAR</u>

In Service Appeal No 11927/2020

Sattar

VERSUS

Govt. of Khyber Pakhtunkhwa & others

REJOINDER ON BEHALF OF APPELLANT TO THE COMMENTS FILED BY RESPONDNET NO. 01 TO 05

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Appellant

Through

Dated: 21/11/2022

M. Ashfa runkhail & Mujeeb Ullah Khalid & Law Asso 46 C, Cantonment Plaza 2nd Floor, Peshawar, sadar.

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Respectfully Sheweth:

i.

Rejoinder to the Preliminary Objections:

All preliminary objections raised from Para No.1 to 6 are vague, evasive and without any substance, hence, denied. However, the Appellant being civil servant with in meaning of Section 2 (1) (b) of KP Civil Servant Act, 1973, has approached this Hon'ble Court inter alia on following grounds.

- The Appellant is performing his duty as regular employee of the Respondent's Department and is getting **his salaries** along with responsibilities directed by the Provincial Police Officer.
- ii. In pursuance of promulgation of the KP Levis (Transition ordinance 2019), the Respondent No.4 vide office order dated 8/4/2019awarded shoulder promotion to the Appellant like other similar placed employees under the prevailing Police Laws and performing his duty as Deputy Superintendent Police (DSP).

Copy of office order dated 8/4/2019 is already annexed as annexure J at page 36 of the main appeal.

iii. Above all, the question of maintainability of Appellant's appeal and jurisdiction of this Hon'ble Court has already been resolved/decided by Hon'ble Peshawar High Court vide Judgment dated 06/02/2020 rendered in W.P 3563 of 2019, and till date the Respondent has not challenged the same before the Apex Court, which has attained finality, hence, on this score alone, Respondent's

Department plea regarding jurisdiction and maintainability of appeal is without substance rather the same is not appealable to prudent mind.

- iv. Admittedly, the Appellant along with other similarly placed employees in connected appeals are the Civil Servants and their status has been confirmed by Hon'ble Peshawar High Court vide judgment dated 06/02/2020 which has attained finality. Hence, the Appellant being civil servant as enshrined in Section2 (1) (b) of Khyber Pakhtunkhwa Civil Servant Act, 1973, has left with no other option but to approach this Hon'ble Court under Section 4 of the KP Service Tribunal Act, 1974 against the impugned Order dated 06/10/2020.
 - The Respondent's Department has already raised the same plea regarding maintainability, jurisdiction and applicability of Article 9(2) of Khyber Pakhtunkhwa Leaves Force Act, 2019 in their comments as well as at the time of arguments before the Hon'ble Peshawar High Court in W.P No.3563 of 2019 and the same being **past and closed chapter can't** be raised at this stage before this Hon'ble Court. Hence, the Respondent's department is estopped by their own conduct.

v.

vi.

After 25th Constitutional Amendment, the Appellant's erstwhile Department (Federal Leaves Force) was provincialized on 12th March, 2019 through promulgation of KP Leaves Force (Transition) Ordinance 2019 and vide notification/ memorandum dated 18th March, 2019, all the administrative, legal, ancillary matters, including service appeal, promotions and litigation in respect of both forces i-e Levies and Khasadar were transferred to Government of Khyber Pakhtunkhwa and ministry of SAFRAN has ceased its authority over the Appellant's Erstwhile Department.

Thereafter, Khyber Pakhtunkhwa Levis Force Act 2019 was promulgated on September 16, 2019 but during time period of conversion of Ordinance to Act, (12th March 2019 to 16th September, 2019), no cut of date has been mentioned for the retirement notification of Ex-Leaves and Khasadars. Hence, the impugned order dated $\frac{6}{10}/2020$ is based on presumption and assumption and is liable to be set aside.

Copy of notification/ memorandum dated 18th March, 2019 of Ministry of SAFRON is annexed as annexure R-1

vii.

That in order to discuss the issues related to newly absorbed levies/Khasadars Forces of newly merges districts, a committee was constituted, who under chairmanship of Regional Police Officer, Malakand/ **Respondent No.3**convened meeting held on 02/06/2021 wherein in it was decided to declared **28th March**, **2019** as the cut of date for retirement of Levies/Khasadars Force and the District Police Officers were directed to provide the names of those officials/ employees who are retiring after the cut of date i-e 28/3/2019.

Copy of minutes of meeting dated 02/06/2021 is annexed as annexure R-

FACTS:

2

1. Need no comments.

2. Need no comments

3. That Para No. 3 of the comments is wrong, against fact and personal file of the appellant, misleading, mere allegation, without substance, based on surmises and conjuncture hence denied. Moreover, the Appellant served the Department with zeal and zest up to the entire satisfaction of the high ups, that's why the Appellant had achieved Best Performance Certificate, Commendation Certificate and appreciation letters from Respondents department.

{Copies of Certificates are annexed as R/3-R/7}

- 4. Admitted fact need not to be proved, hence no comments
- 5. That Para No. 5 of comments is wrong, misleading and miss conceived, against law and facts hence denied. The detail reply is given in reply to preliminary objections
- 6. Reply to Para. 6 is wrong, miss leading, concocted against law and facts hence denied. The detail reply is given in reply to preliminary objections.

- 7. That Para No. 7 of the comments is wrong, false, misconceived, against fact and law hence, denied. The detail reply is already given in reply to preliminary objections.
- 8. That Para No. 8 of the comments is wrong, fabricated, misleading and misconceived hence, denied. However, it is worth to mention that the Appellant is serving the police department as DSP and getting his salary from the Police Department. The detail reply is already given in above para's
- 9 That Para No. 9 of the comments is self-explanatory, based on assumption and presumption, wrong, irrelevant, misconceived hence denied. In furtherance, shoulder promotion vide office order dated 08-04-2021 by the Respondents, the Appellant is serving Police Department as DSP till date and is getting his monthly salary in lieu of his services to the Respondents/ Department like other similarly placed police officials. The detail reply is already given in above para's

{Copy of Pay Slip are annexed as R/8 }

- 10. That para no.10 is evasive denial, which amounts to admission; hence, the detail reply is already given in reply to preliminary objections.
- 11. Need no comments
- 12. That Para No. 12 is wrong, misleading, misconceived and fabricated, hence, denied. As mentioned above, the Appellant along with other appellant in connected appeals does not falls within cut of date i-e 28/3/2019 as per minutes of meeting held on 02/6/2021. The detail reply is already been given in reply to preliminary objections.
- 13. That Para. 13 of the comments is wrong, illegal, discriminatory, abuse of law and process, misuse of authority vested in authority and without cogent grounds and reason, hence, denied. Moreover, the impugned order dated 6/10/2020 is the outcome of personal grades, malafide intentions, only to harass and drag the innocent appellant into frivolous and baseless litigation and nothing else. The detail reply is already given.
- 14. That Para No. 14 is wrong, incorrect and misleading hence, denied. The detail reply is already given.
- 15. That in response to para no.15 of the comments it is stated that after 25th Constitutional Amendment, all the federal levies Force including Khasadar Force were provincialized by way of KP Levies Force (transition) Ordinance, 2019 and in pursuance thereof, the SAFRON Ministry vide notification dated 18th March,

2019, ceased its authority over the Federal Force by transferring all the administrative, legal, ancillary matters, including service appeal, promotions and litigation in respect of both forces i-e Levies and Khasadar to Government of Khyber. But Appellant including other appellant in connected appeals are treated in accordance with law like employees of Provincial Tribal Leaves Force in shape of notification and Provincially Administered Tribal Areas Levies Force (Amendment) Act, 2021. Hence, the impinged order dated 6/10/2021 is discriminatory and against article 4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973.

- 16. That Para No.16 of the comments is wrong, illegal, against fact and law, hence, denied. The detail reply is already given in above para's.
- 17. That para No. 17 is wrong, illegal, against fact and law, hence, denied. The detail reply is given in above para's.

GROUNDS:

That Para No. A to M of the grounds of comments are wrong, illegal, misleading, misconceived, based on assumption and presumption, against the admitted fact and law on the subject matter, hence, denied. The detail reply is already been given in reply to preliminary objections to the comments.

In wake of above submission, it is, therefore, most humbly prayed the appeal of the appellant may please be allowed and accepted as prayed for.

pellant

X.

Through

M. Ashfaq Khan Akhunkhail

Mujeeb/Ullah Advocate High Court, Peshawar.

Dated: 13+12-2021

IN THE PESHAWAR HIGH COURT PESHAWAR

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<u>AFFIDAVIT</u>

I, Abdul Sattar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



DEPONENT

Government of Pakistan Ministry of States & Frontier Regions <><><><>

No.F.8(1)-LK/2019

Islamabed, the 18th March, 2019

(ASXD IQBAL)

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MEMORANDUM

Subject: -

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1.

REPEAL 0F FEDERAL LEVIES PROMULGATION OF KHYBER PAKHTUNKIIWA LEVIES FORCE TRANSITION FORCE_ 2019 & KHYBER PAKHTUNKHWA (MAINTENANCE, REGULATION AND PROTECTION OF SERVICE) (TRANSITION)

I am directed to convey that consequent to the 25th Constitutional Amendment, the Federally Administered Tribel Areas (Erstwhile FATA) and Provincially Administered Tribal Areas (Erstwhile PATA) stand merged in the Province of Khyber Pakhtunkhwa, and therefore, the President Islamic Republic of Pakistan or the Federation cannot make Regulations for erstwhile FATA anymore. All the functions performed by the Erstwhile FATA Secretariat, its Secretaries and Directorates also stand transferred to the concerned Departments of Government of Khyber

The Federal Levies Force, Regulation, 2012 has been repeated through Knyber Pakhtunkliwa i,evies Force Transition Ordinance ORD. NO. 1 of 2019 on 12th March, 2019 whereby the said Force stands provincialized. Similarly the knashdar Force working in the erstwhile Federally Administered Tribal Areas through Executive Orders and instructions, for management of said areas within the framework of territorial and collective responsibility, also stands provincialized through Knyber Pakhtunkhwa Khasadar Force (Maintenance, Regulation and Protection of Service) (Transition) Ordinance ORD. NO, II of 2019.

Now therefore, all the administrative, legal and ancillary matters, including service appeals, promotions and litigation in respect of both the forces he. Levies Force and Khasadar Force have been transferred to the Gevernment of ithyber Pakhtunkhwa and its relevant forums from 12th March, 2019, the date of the issuance of above said Ordinances.

It is clorified that Ministry of States and Fronties Regions (JAFRON) has ceased to be the controlling authority in respect of Lovies Force and Khasadar Force working in erstwhile FATA & PATA. All concerned Commandants and other Forums may kindly be informed accordingly.

The Chief Secretary, Government of Khyber Pel Innukhiva, Peshewar, The Advocate General, Government of Blyber Pakhrönkhwa, Peshawar,

The Additional Chief Secretary, Merged Ar as Secretariat, Warsak Road, Festawar

Page 1 of 4

MINUTES OF THE MEETING REGARDING THE ISSUES RELATED TO NEWLY ABSORBED LEVIES / KHASADAR FORCE OF NEWLY MERGED DISTRICTS HELD ON 02.06.2021 AT 1200 HOURS

In order to discuss the issues related to newly absorbed Levies / Khasadar Force of Newly merged districts, the committee constituted for the purpose meeting held on 02.06.2021 at 1100 hrs in CPO Conference Room No.1, Peshawar under the Chairmanship of the Mr. Abdul Ghafoor Afridi, Regional Police Officer, Malakand, wherein the following officers participated in the meeting:

Muhammad Ijaz Khan
DIG Spec
Mr. Irfan Ullah Khan
AIG Estat
Mr. Quraish Khan
AIG Train
Mr. Quraish Khan
AIG Train
Mr. Yasir Afridi
SSP Open
Mr. Javed Ahmed Chughtai
AIG Lega
Mr. Shahzada Kaukab Farooq
DPO Baja
Mr. Naveed Khalil
Budget Of
Mr. Ayaz Khan
Represent
Mr. Mazhar Khan Afridi
Represent
Mr. Syed Jalal
Represent
Mr. Ali Khawaz Khan
Represent

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1. Rai Babar Saeed

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DIG HQrs, Khyber Pakhtunkhwa. DIG Special Branch, Khyber Pakhtunkhwa. AIG Establishment, CPO Peshawar. AIG Training, Khyber Pakhtunkhwa SSP Operations, Peshawar. AIG Legal, Khyber Pakhtunkhwa. DPO Bajaur Budget Officer, CPO Representative of Distt: Mohmand Representative of Distt: Bajaur Representative of Distt: Khyber Representative of Distt: North Waziristan Representative of Distt: Orakzai Representative of Distt: Kurram Representative of Distt: Kurram

- 2. The meeting started with recitation of the Holy Quran.
- 3. The following TORs were discussed in detail and decisions taken accordingly:
 - i. Pension Cases of absorbed Khasadar Force of Newly Merged districts.
 - ii. Issues of Cost Center i.e Levies, Khasadar & Police.
 - iii. Shuhada Package & Recruitment of Wards of Shuhada.
 - iv. Recruitment of already qualified candidates in district Bajaur for the post of Constable against the quota reserved for Minorities & Female.

v. Stoppage of Notification of Retirement through Home Department.

vi. Issues of Salaries of HC, ASI, SI & DSP & Utilization of Budget of NMDs.

vii. Promotion & Training related issues of Levics/Khasadar Force of NMDs.

viii. Any other issues.

S. No.	ISSUES IN	RECOMMENDATIONS	Action by	Timeline
	NMDS			within 15 days
	Pension Cases of absorbed Khasadar Force of Newly Merged Districts	The committee has assigned the task to DPOs of NMDs to obtain/collect the data/cases of pension of absorbed Khasadar Force of Newly Merged Districts within 15 days and submit to Budget Officer for onward submission to	All DPOs of Newly Merged Districts Budget Officer AIG Estab:	witten 15 tays

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Page 2 of 4 the quarter concerned to resolve the instant issue. 2. Issue of Cost After detailed deliberations, the Chair Budget Officer, Immediately Centre i.e Levics, directed that Budget Officer, Central CPO. Khasadar & Police Police Office will take up the case with Provincial Government for one cost center instead of 03 cost centers i.e Levies, Khasadar & Police of **NMDs** 85 it would create discrepancies among the members of levies/Khasadar Force and as well as create hurdle in the process of counting, recording and irregularities. Furthermore, the three separate cost centre in the district would create audit Paras /NAB objections. 3.1 Shuhada Package The committee recommended that AIG Welfare Immediately & Recruitment of AIG Welfare & AIG Establishment AIG Estab: Wards of Shuhada may expedite the cases of Shuhada's of NMDs and summary of Recruitment of Wards of Shuhada, respectively. 4Ī. Recruitment The committee recommended that of All DPOs of Immediately already qualified quota should Newly Merged be reserved for candidates minorities Districts in & Female and no district Bajaur for recruitment will be made against the post of these reserved vacancies. Constable against the quota reserved for Minorities & Female, 15. Stoppage The Home Department have retired the of All DPOs of Within 15 Notification Levies/Khasadars oſ personnel after Newly Merged days Retirement announcement of 25th Constitutional Districts Amendment 2018, promulgation of through Home Khasadar/Levies Force, Ordinances, Department. 2019 & during the time period of conversion from Ordinance to Act, no provision of cut of date was mentioned for the retirement notification of Exlevies/Khasadars.

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		The committee decided that cut of date		1	٦ :
		for the notification may be declared on		5	ĺ
		28.03.2019 as per the Ordinance of			
		Levies/Khasadar was enforced and DPOs			
	1	were posted in NMDs. In this regard,			
	4	DPOs of newly merged district will			
	i E	provide the names of those			
	r	levies/khasadars i.e decensed,			
	£	incapacitated, Shaheed & the official			
•		who are retired after the cut of date.			
6.	Issues of Salaries	Budget Officer CPO clarified that the	All DPOs of	Within 03	-
	of HC, ASI, SI &	fixing of salaries is the mandate of	Newly Merged	days	
	DSP & Utilization	District Account Office and specialized	Districts		
	of Budget of	people namely pay fixation party are			ļ
	NMDs.	deployed for subject purpose. In this			
		regard, all DPOs of newly merged			
		district will take up the case with their			
		concerned District Account Offices to			
	. ·	resolve the issues of salaries			
7.	Training related	AIG Training, Khyber Pakhtunkhwa	AIG Training	Immediately	_
	issues	appraised regarding the successful	AIO Training	minediately	
		completion of training of absorbed			
•		levies/ Khasadar. In which the		· ·	
		representatives of Levies/Khasadars have			
,					
		raised various observations that already			
-		trained basic recruits in NMDs may not			
r	1	be selected for the purpose of training in			
1		army training institutes. After detailed			
:		discussion, the committee recommended			
		that the ex-levies & Khasadar personnel	-		
	•	who are above 45 years shall be granted			
•		some relaxation in physical activities in			
, <u>i</u>		the Basic Recruit Course.			
8.	Separate Desk at	The committee recommended that a	DIG HQrs:	Immediately]
	CPO level	separate desk for Newly Merged District	AIG Estab:		
l F		at CPO level will be established along	AIG Welfare		
	ŕ	with supporting staff and one officer			
n N		from each NMDs district will be posted	-	e C	S
		in order to resolve the issues pertaining			4
		to NMDs. AIG Welfare is recommended			X
		as focal person for Separate desk at CPO		$ P_i\rangle$	4
!		level for NMDs.		'/	4

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Page 4 of 4 Ò. Promotion Related The promotion related issues were All DPOs of Within 15 issues. discussed deliberately, after detailed Newly Merged days discussion, the committee unanimously, **Districts for List** approved that all the absorbed officers "A, B & C" shall be deemed confirmed from the date All RPOs except of regular appointment in the respective Hazara Region ranks as Levies & Khasadars. for List "D & E" Promotion of all the absorbed officers and AIG Estab: shall be made on the basis of seniority for List "F" lists i.e List A, B & C which are maintained at the district level while list "D" & "E" maintained at the regional level, whereas, list "F" is maintained at CPO level as prescribed in the Police Rules, 1934. The meeting ended with the vote of thanks. (Muhammad Ljaz Khan)PSP (Irfan Nijan Khan) PS (Quraish Khan) PSI Ahmed) DIG Special Branch AIG Establishment, AIG Training, /G begal," Khyber Pakhtunkhwa Khyber Pakhtunkhwa Khyber Paktunkhwa (hyber) Pakhtunkhwa. UIII^L (Naveed Khalil) (Habib Ullah) (Mazhar Khan Afridi) (Sattar Khan) **Budget Officer**, **Representative of Representative of Representative of** CPO **Distt: Khyber Distt: Bajaur** Distt: Bajaur Chairman Abdul Ghafoor Afridi) ^{PSP} **Regional Police Officer**, Malakand

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The why date 1 - e 28 - 2 has been declared by the constitue. hence, all the appellants are broken when of the out of the

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No.

OFFICE OF THE <u>REGIONAL POLICE OFFICER, MALAKAND</u> AT SAIDU SHARIF SWAT. <u>Ph: 0946-9240381-82 & Fax No. 0946-9240390</u> <u>Email: digmalakand@yahoo.com</u>

558 /PA, dated Saidu Sharif the 22 / 6 /2021

APPRECIATION LETTER

It gives me immense pleasure to bring on the record that you Mr. Sattar Khan, SDPO Nawagai, District Bajaur demonstrated excellent performance by recovering a large number of explosive material, Mines, Grenades and IEDs in the area of Zorobadar PS Loe Sam.

It speaks volumes of your exceptional devotion to duties and professionalism which is a matter of pride and satisfaction for Khyber Pakhtunkhwa Police.

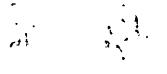
I expect that you and your team would continue to work with the same zeal and professional acumen and bring more laurels for the Police Department in the future.

Mr. Sattar Khan, SDPO, Nawagai District Bajaur.

(ABDUL GI AFRIDI) PSP

Regional Police Officer, Malakand at Saidu Sharif, Swat





OFFICE OF THE <u>BEGIONAL POLICE OFFICER MALAKAND</u> AT SAIDC SHARF SWAT <u>Pro: 6946-9240381-82 & Fox No. 2946-2240391</u> <u>Fmull: dizevolokontarchoo.cce1</u>

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I expect that you and your team would continue to work with the same zeal and professional acumen and bring more faurels for the Police Department in the future

> Mr. Sattar Khan. SPPO. Nawagai District Bajaur.

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(ABDU), GJAF HOB AFRIDI) 780-Stegronal Folice Officer. Malakar, dat Saidu Sharif, Swat





No.

955

OFFICE OF THE <u>REGIONAL POLICE OFFICER, MALAKAND</u> AT SAIDU SHARIF SWAT. <u>Ph: 0946-9240381-82 & Fax No. 0946-9240390</u> <u>Email: digmalakand@yahoo.com</u>

/PA, dated Saidu Sharif the 23 / 08 /2021

APPRECIATION LETTER

It gives me immense pleasure to bring on the record that you Mr. Sattar Khan, SDPO, Nawagai, Bajaur demonstrated excellent performance and arrested of one PO and recovered 1-SMG, 1-Pistol 30-Bore and 2-Hand Grenade.

It speaks volumes of your exceptional devotion to duties and professionalism which is a matter of pride and satisfaction for Khyber Pakhtunkhwa Police.

I expect that you and your team would continue to work with the same zeal and professional acumen and bring more laurels for the Police Department in the future.

Mr. Sattar Khan, SDPO, Nawagai District Bajaur

(ABDUL GHÁFØOR AFRIDI) PSP Regional Police Officer, Malakand at Saidu Sharif, Swat



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Police No:			
Form No: _	high pathunesme politic		
	IYBER PAKHTUNKHWA	· · · · · · · · · · · · · · · · · · ·	
	JENDATION CE	DTIFICATE.	
GUIVIN	<u>CLASS III</u>		
	CLASS III		
Granted to	<u>CLASS III</u> Sattar Khinn SDDC (N)	>f	
Granted to Son of Village,	<u>CLASS III</u> <u>Sattar Khan Sppc (N)</u> Resident c Police Station,	of District	
Granted to Son of Village, in recognition of_	<u>CLASS III</u> <u>Sattar Khan SDO (N)</u> Resident of Police Station, <u>Crend Derbormance</u>	of District	
Granted to Son of Village, in recognition of	<u>CLASS III</u> <u>Sattar Khan Sppc (N)</u> Resident c Police Station,	of District	
Granted to Son of Village, in recognition of_	<u>CLASS III</u> <u>Sattar Khan SDO (N)</u> Resident of Police Station, <u>Crend Derbormance</u>	of District	

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Sattar Khan, DSP, Police Department Bajaur

In pursuance of PSO to Chief Secretary Khyber Pakhtunkhwa directions vide letter No.PSO/CS/KPK/COVID-19 /2020 dated 2^{nd} July 2020 and commemoration of 4th July, 2020 as Hundred Days of Nation's resolve Humility in Efforts during COVID-19, District Administration Bajaur recognizes and appreciates your services during COVID-19 pandemic.

> Deputy Commissioner, Tribal District Bajaur

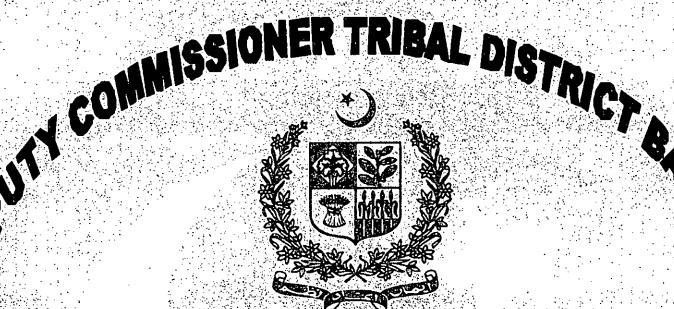
No.5011/COVID-19 4th July 2020

op it 340 AV And ber mondation Certificate the do the do the do the do the do the 25 1 Commendation Certificate **CLASS I** Granted by Inspector General of Police, Khyber Pakhtunkhwa SATTAR SUBIDAR MAJOR To Son of **DISTRICT BAJAUAR AGENCY** District in Recognition of Good performance of official duty. Inspector General of Police No. 68 / PSO TO IGP Khyber Pakhtunkhwa Dated og 104 12019 ap it op Yest Assess Asses

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Dated Dated	- "** , 1	Diștrict	, , , ,			

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APPRECIATION CERTIFICATE

Mr_<u>Spho</u> of Tribal District Bajaur is a seasoned professional of DC bajaur Office. His efforts to combat Covid-19 pandemic in Tribal District Bajaur deserve special recognition. He is hereby awarded with appreciation certificate from Deputy Commissioner-for his commendable services.

Deputy Commissioner



Date 4/7/2020



V 5050 Nobula (commissioned	METDONE	Commissioner for his commendable services. Office. His efforts to combat Covid-19 pandemic in Tribal District Bajaur deserve special recognition. He is hereby awarded with appreciation certificate from Deputy of Tribal District Bajaur deserve description for the intervention of Tribal District Bajaur deserve description of Tribal District Bajaur deserve description of Tribal District Bajaur deserve description for the from Deputy description of Tribal District Bajaur deserve description for the from Deputy deserve description for the from Deputy description for the from Deputy deserve description for the from Deputy deserve deserv	VII. ADDECTVIION CERTIFICATE			CULINE BIOMER LISTENT OR LEVE
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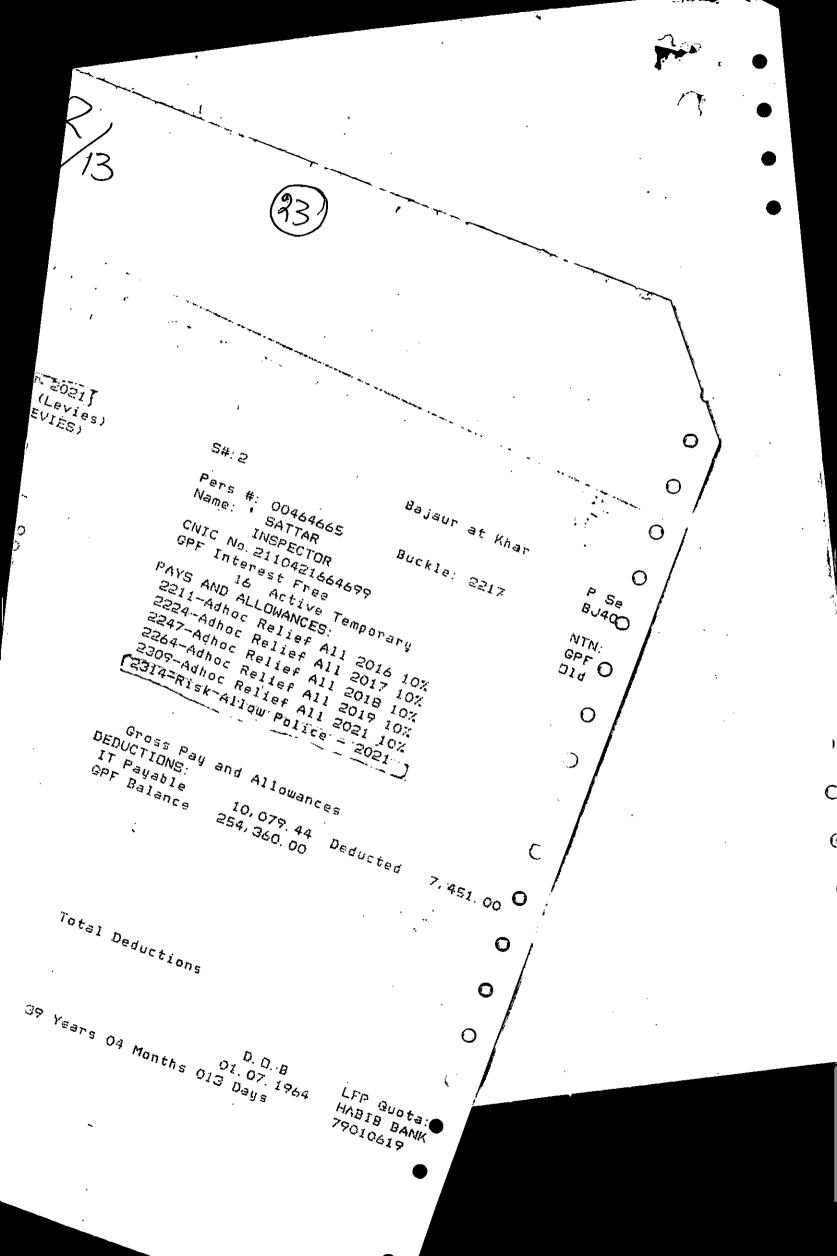
C

	Police No: 107 Form No: 15-3(C)
	Police No: 107 Form No: 15-3(C)
$\left(\overrightarrow{A} \right)$	KHYBER PAKHTUNKHWA POLICE
G	Granted to S.D.PO Naluzagay Mr. SATIan
S	on of <u>Talib khom</u> Resident of
	illage, Police Station, <u>Mawagay</u> District Bayaur
	recognition of his excellent cluby during the record provincial
	Election 2019.
	B.No: <u>84</u> District Police Officer, Bajaur
	Note. (1) If a Officer, rank and number in final. (2) Cash reward if any, to be Specified

tomex S#:1 Bajaur at Khar Pers # 00464665 Name SATTAR Sec: 001 Buckle: 2217 B34024 -Inspector Bajaur [INSPECTOR] CNIC No 2110421664699 INSFECTOR BAJAUR (L GPF Interest Free NTN GPF.#. 16 Active Temporary PAYS AND ALLOWANCES 010 4: 0001-Basic Pay 1001-House Rent Allowance 45% 1300-Medical Allowance BJ4024 1528-Unattractive Area 1646-Constabilary & Allowance -34, 110 1933-Special Risk Allowance Allow 4,091. 2148-15% Adhoc Relief All-2013 1 1, 500. 2168-Fixed Daily Allowance 1,000 2199-Adhec Relief Allow @10% 50_{0.}, Gross Pay and Allowances 5,000. (DEDUCTIONS. 780 C IT Fayable 4,900.0 CPF Balance 10,079 44 3660-5% House Rent Chrgs(2005) 659.0 Deducted 7,451 00 78,687 TAX: (3609) ^{1,} 440. 00 Subre. 3, 340, 00 682, 00 1,477 00 **20**, 000, 00 Total Deductions ķ 26, 939. 00 D. O. B De rears 04 He 51, 748.00 01.07 1964 LFP Quota: THAT OIS Days HADIB BANK LIMITED 79010619 KHAR, AJAUR AGENC

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1	Processie no		Employee Group .			1			
	30047		1 7		DESCRIPTION	ID of related object			OPEN/FILLE
-	28967	ABDUL SAMAD	7	80B49982	ASSISTANT INSPECTOR GENERAL OF POLICE	00100235	ASSISTANT INSPECTOR GENERAL OF	19	FILLED
11	28967		7	80849982 80850030	ASSISTANT INSPECTOR GENERAL OF POLICE	00100235 00100926	ASSISTANT INSPECTOR GENERAL OF DEPUTY SUPERINTENDENT OF POLIC	19	FILLED
1.1.1	28967		7 7	80849982 80850030 80850029	ASSISTANT INSPECTOR GENERAL OF POLICE	00100235 00100926 00100926	ASSISTANT INSPECTOR GENERAL OF DEPUTY SUPERINTENDENT OF POLIC DEPUTY SUPERINTENDENT OF POLIC	19	FILLED OPEN OPEN
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	464665	ABDUL SAMAD	7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	80849982 80850030 80850029 80850045 80860789 80860751 80860750	ASSISTANT INSPECTOR GENERAL OF POLICE CEPUTY SUPERINTENDENT OF POLICE DEPUTY SUPERINTENDENT OF POLICE SUPERINTENDENT SUPERINTENDENT	00100235 00100926 00100926 00102410 00102410 00101365	ASSISTANT INSPECTOR GENERAL OF DEPUTY SUPERINTENDENT OF POLIC DEPUTY SUPERINTENDENT OF POLIC SUPERINTENDENT SUPERINTENDENT INSPECTOR	19	OPEN/FILLE FILLED OPEN OPEN OPEN FILLED
	464665 454663	ABDUL SAMAD	7 7 7 7 7 7 7 7 7 7 7	80849982 80850030 80850029 80850045 80880789 80880751 80880750 80876474	ASSISTANT INSPECTOR GENERAL OF POLICE DEPUTY SUPERINTENDENT OF POLICE DEPUTY SUPERINTENDENT OF POLICE SUPERINTENDENT SUPERINTENDENT INSPECTOR	00100235 00100926 00100926 00102410 00102410 00101365 00101365	ASSISTANT INSPECTOR GENERAL OF DEPUTY SUPERINTENDENT OF POLIC DEPUTY SUPERINTENDENT OF POLIC SUPERINTENDENT SUPERINTENDENT INSPECTOR	19	OPEN/FILLE FILLED OPEN OPEN OPEN FILLED FILLED FILLED
	464665 464665 464262	ABDUL SAMAD	7 7 7 7 7 7 7 7 7 7 7	80849982 80850030 80850029 80850045 80880789 80880751 80880750 80876474	ASSISTANT INSPECTOR GENERAL OF POLICE CEPUTY SUPERINTENDENT OF POLICE DEPUTY SUPERINTENDENT OF POLICE SUPERINTENDENT SUPERINTENDENT INSPECTOR ASSISTANT	00100235 00100926 00100926 00102410 00102410 00102410 00101365 00101365 00100130	ASSISTANT INSPECTOR GENERAL OF DEPUTY SUPERINTENDENT OF POLIC DEPUTY SUPERINTENDENT OF POLIC SUPERINTENDENT SUPERINTENDENT INSPECTOR INSPECTOR ASSISTANT	19	OPEN/FILLE FILLED OPEN OPEN OPEN FILLED FILLED FILLED FILLED
	464665 464664 464262 459987	ABDUL SAMAD SATTAR GULZAR KHAN MIAN ZAHID JAN MUHAMMAD ZADA	7 7 7 7 7 7 7 7 7 7 7	80849982 80850030 80850029 80850045 80880789 80880750 80880750 80878473 80878473 80850034	ASSISTANT INSPECTOR GENERAL OF POLICE DEPUTY SUPERINTENDENT OF POLICE SUPERINTENDENT SUPERINTENDENT INSPECTOR ASSISTANT ASSISTANT	00100235 00100926 00100926 00102410 00102410 00101365 00101365 00101365 00100130	ASSISTANT INSPECTOR GENERAL OF DEPUTY SUPERINTENDENT OF POLIC DEPUTY SUPERINTENDENT OF POLIC SUPERINTENDENT SUPERINTENDENT INSPECTOR INSPECTOR ASSISTANT ASSISTANT	19	OPEN/FILLE FILLED OPEN OPEN OPEN FILLED FILLED FILLED FILLED FILLED

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460759	SAID GUL	17	80890768	SUB INSPECTOR	00102396 11	SUB IN SPECTOR	FILLED
461654	ZAR SHAH	- 7	80880767	SUB IN SPECTOR	00102396 3.	SUB INSPECTOR	FILLED
461649	OABIL SHAH	7	80580766	SUB INSPECTOR	00102396 1	SUB INSPECTOR	FILLED
516784	KHAN ZADA	7	80880765	SUB IN SPECTOR	09102396	SUB INSPECTOR	FILLED
516781	FAZAL REHMAN			SUB INSPECTOR	00102396/+	SUR IN SPECTOR	FILLED
516776	HAMID ULLAH	7	80380763	SUB IN SPECTOR	08102395 1	SUB INSPECTOR	FILLED
* 683024	IJAZ FIDA	7	80980761	SENIOR CLERK	1 00102110	SENICR CLERK	FILLED
461661	SHERAZ UDDIN	7	80880769	SUB IN SECCTOR	001:22396	SUB INSPECTOR	FILLED
516765	JAN MOHAMMAD	7	80990788	SUB IN SPECTOR	00102396 -	, SUB INSPECTOR	FILLED
464690	DILAWAR KHAN	7	80980787	SUB INSPECTOR	00102396	SUB INSPECTOR	FILLED
464680	MUHAMMAD JAN	7	80880786	SUB INSPECTOR	00102396	, SUB INSPECTOR	FILLED
464687	MUNIR ZADA	17	80880785	SUB INSPECTOR	00102396	SUD IN SPECTOR	FILLED
364686	AMAN ULLAH	7	80980784	SUB INSPECTOR	00102396	SUB INSPECTOR	FILLED
461658	SOHAIL KHAN	7	80880782	SUB INSPECTOR	00102395	SUB INSPECTOR	FILLED
451639	KHAN ZADA	7	80380781	SUB IN SPECTOR	00102396	1 SUB INSPECTOR	FILLED
461930	ABDUL AZIZ	j 7	60380780	SUB IN SPECTOR	00102396	SUB INSPECTOR	
461924	MUHAMMAD DOOSTAN	7	60380779	SUB INSPECTOR	00102376	SUB INSPECTOR	FILLED
461923	SULTAN ZEB	7	60990778	SUB INSPECTOR	00102396	SUB INSPECTOR	* FILLED
461922	BAKHTMUNIR	7	60880777	SUB IN SPECTOR	00102396	SUB INSPECTOR	FILLED
461920	Начаткнал	7	80980776	SUD INSPECTOR	00102396	SUB INSPECTOR	FILLED
461910	DIER BAHADER	7	. 80980775	SUB IN SPECTOR	00102396	SUB INSPECTOR	FILLED
461901	MUHANAMBER KHAN	7	80880774	SUB INSPECTOR	00102396	SUB INSPECTOR	
461684	ZARIF KHAN	7	60880773	SUB INSPECTOR	00102390	SUB INSPECTOR	FILLED
461680	IBRAHIM	7	1 80980772	SIJE IN SPECTOR	00102396	· · · · · · · · · · · · · · · · · · ·	FILLED
\$61667	NIAMATULLAH	7		SUB IN SPECTOR			FILLED
		÷ -	00000771		00102390	SUB INSPECTOR	FILLED

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