

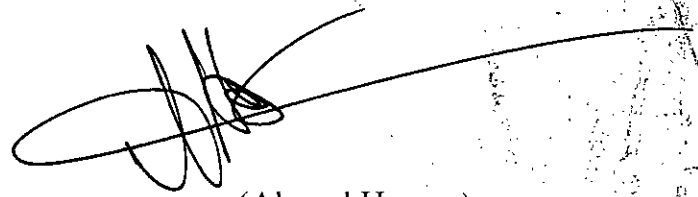
Order

25.01.2019

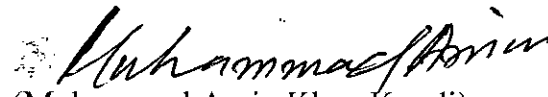
Counsels for the appellant present. Mr. Muhammad Jan, Deputy District Attorney alongwith Dr. Fakhar Alam, SMBR (respondent no.3) and Mr. Muhammad Arif, Supdt for respondents present. Arguments heard and record perused.

This appeal is also dismissed as per detailed judgment of today placed on file in connected service appeal No. 1130/2014²⁰¹⁶ titled "Jehanzeb -vs- The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar and two others." Parties are left to bear their own cost. File be consigned to the record room.

Announced:
25.01.2019



(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

19.11.2018

Appellant present in person. Mr. Ziaullah, Deputy District Attorney for the respondents present. Appellant requests for adjournment once again on the ground of non-availability of his learned counsel.

We have noticed that on at least 3 occasions adjournments were sought and granted to the appellant. Moreover, learned Deputy District Attorney stated at the bar that similar question already stand decided and the adjournment had been sought to avoid the consequences of decided point. Adjourned for final arguments to 17.12.2018 before the D.B. On the next date the appellant shall ensure the availability of his counsel, failing which the case would be decided on available record.




Member



Chairman

17.12.2018

Appellant in person. Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Appellant requested for adjournment that his counsel is not in attendance. Adjourned. To come for arguments on 25.01.2019 before D.B



(Hussain Shah)
Member



(Muhammad Amin Kundi)
Member

23.02.2018

Appellant in person and Asst: AG for the respondents present. Appellant seeks adjournment as his counsel is not in attendance. Adjourned. To come up for arguments on 26.04.2018 before D.B.


(Ahmad Hassan)
Member(E)


(Gul Zeb Khan)
Member(E)


26.04.2018

Learned counsel for the appellant and Mr. Muhammad Jan, Learned Deputy District Attorney present. The Tribunal is non functioned due to retirement of Hon'ble Chairman. Therefore the case is adjourn. To come up for the same on 21.06.2018.


READER

21.06.2018


Counsel for the appellant and Mr. Muhammad Jan, DDA for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for ~~arguments~~ on 31.07.2018 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

31.07.2018


Clerk to counsel for the appellant and learned Assistant Advocate General for official respondents present. Clerk to counsel for the appellant seeks adjournment as learned counsel for the appellant is not in attendance. Adjourned. To come up for arguments on 26.09.2018 before D.B.



(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

26.09.2018

Clerk to counsel for appellant and Mr. Kabir Ullah Khattak learned Assistant Advocate General present. Clerk to counsel for appellant seeks adjournment as counsel for appellant is not in attendance. Adjourned. To come up for arguments on 19.11.2018 before D.B.


(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

1106/2016

24.04.2017

Counsel for the appellant and Assistant-AG for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned for rejoinder and final hearing to 25.07.2017 before D.B.

Member

Chairman

08 25.07.2017

Counsel for the appellant and Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Counsel for the appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 27.12.2017 before D.B.

(Ahmad Hassan)
Member

(Muhammad Hamid Mughal)
Member

27.12.2017

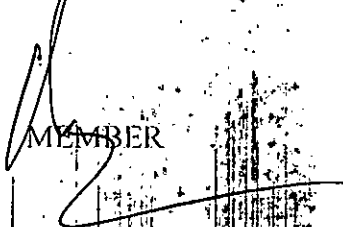
Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Rejoinder not submitted. Counsel for the appellant requested for adjournment. Adjourned. To come up for rejoinder, if any, and arguments on 23.02.2018 before the D.B.

Member

Chairman

05.12.2016

Appellant in person and Mr. Mukhtiar Ali, Supdt alongwith Asst: AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 05.01.2017 before S.B. Till then the operation of the impugned orders stands suspended till the date fixed.


MEMBER

05.01.2017

Appellant with counsel and Mr. Mukhtiar Ali, Supdt alongwith Asst; AG for respondents present. Written reply on behalf of respondents No. 1,2 and 3 submitted. None appeared on behalf of respondents No. 4,5 and 6. Notice be issued to respondents No. 4, 5 and 6 for submission of written reply/comments. To come up for written reply/comments of respondents No. 4,5 and 6 on 06.02.2017. Till then the operation of the impugned orders stands suspended till the date fixed.


(MUHAMMAD AMIR NAZIR)
MEMBER

06.02.2017

Clerk to counsel for the appellant and Mr. Ibrar Khan Assistant Secretary alongwith Addl: AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing on 24.04.2017.


(ASHFAQUE TAJ)

MEMBER

Appeal No. 1106/2016
Abdul Jalil vs Govt

08.11.2016

Appellant with counsel present. Preliminary arguments heard and case file perused. Learned counsel for the appellant submitted that after serving almost 18 years in the department, the appellant was ultimately appointed as Naib Tehsildar vide order 04.11.2010. That he continued to serve in the said position till 09.09.2016 on which his appointment order as Naib Tehsildar was withdrawn and his departmental appeal was also rejected on 28.10.2016. The learned counsel for the appellant submitted that the impugned order dated 09.09.2016 is unlawful for the reason that no opportunity of defense and hearing has been provided to the appellant and that the impugned order was passed in violation of E&D Rules-2011. The learned counsel for the appellant further argued that this Tribunal in identical cases bearing No. 1032/16, 1033/16 and 1044/16 has admitted ^{appeals} for regular hearing which are fixed on 05.12.2016. He also produced copies of the order of this Tribunal dated 06.10.2016 in appeals No. 1032/16 and 1033/16 and requested that operation of the impugned order ^{may} be suspended. He urged that the appellant deserved for equal treatment with the above referred appellants.

Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply. To come up for written reply/comments on 05.12.2016 before S.B. Till then the operation of the impugned orders stands suspended till the date fixed.



Appellant Deposited
Security & Process Fee


Member

Form-A
FORM OF ORDER SHEET

Court of _____

Case No. 1106/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	31/10/2016	<p style="text-align: center;">The appeal of Mr. Abdul Jalil presented today by Mr. Arshad Jameel Qureshi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	1/11/2016	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08.11.2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal 1106 /2016

Abdul Jalil Versus The Government of Khyber Pakhtunkhwa & others

INDEX

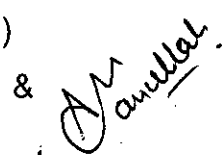
S.No	Description	Annexure	Page No
1.	Ground of Appeal	-	01-05
2.	Application for Suspension Order	-	06
3.	Address of Parties	-	07
4.	Copy of Primary Teachers Certificate	<u>"A"</u>	08
5.	Copy of Letter Dated 17/10/1981	<u>"B"</u>	09
6.	Copy of Application 08/05/2006	<u>"C"</u>	10
7.	Copy of Appointment Order Dated 10/05/2006	<u>"D"</u>	11
8.	Copy of Letters	<u>"E"</u>	12-24
9.	Copy of Appeal Dated 13/07/2010	<u>"F"</u>	25-28
10.	Copy of Order Dated 13/10/2010	<u>"G"</u>	29-30
11.	Copy of Order Dated 04/11/2010	<u>"H"</u>	31
12.	Copy of Result Declaration	<u>"I"</u>	32
13.	Copy of Seniority List of 2014	<u>"J"</u>	33-40
14.	Copy of Seniority List of 2015	<u>"K"</u>	41-47
15.	Copy of Notice received on 21/05/2011	<u>"L"</u>	48
16.	Copy of Reply to Notice	<u>"M"</u>	49-51
17.	Copy of Order Dated 09/09/2016	<u>"N"</u>	52
18.	Copy of Departmental Appeal Dated 04/10/2016	<u>"O"</u>	53-56
19.	Copy of Rejection Order Dated 28/10/2016	<u>"P"</u>	57
20.	Wakalat Nama	-	58

Appellant

Through


(Arshad Jamal Qureshi)
Advocate
Supreme Court of Pakistan


&
(Muhammad Tariq)


&
(Amanullah)
Advocates, High Court
Peshawar.

BEFORE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal 1106 /2016

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1139

Dated 31-10-2016

Abdul Jalil, Political Naib Tehsildar, Barang Bajour Agency

(Appellant)

VERSUS

1. The Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat Peshawar
2. The Government of Khyber Pakhtunkhwa, Revenue and Estate Department through its Secretary, Civil Secretariat Peshawar
3. The Government of Khyber Pakhtunkhwa, Revenue and Estate Department through its Senior Member Board of Revenue, Civil Secretariat, Peshawar
4. The Additional Chief Secretary (FATA) FATA Secretariat, Warsak Road, Peshawar
5. The Deputy Secretary (Law & Order Department) FATA Secretariat, Warsak Road, Peshawar
6. Political Agent, South Waziristan, Agency

(Respondents)

Appeal U/S 4 of The Khyber Pakhtunkhwa Service Tribunal

Act 1974 against Notice received on 21/5/2011 whereby

Appellant Promotion Orders Dated 13/10/2010 and

4/11/2010 was withdrawn vide Order Dated 9/9/2016 and

finally Departmental Appeal of Appellant was rejected vide

Order Dated 28/10/2016 by the Respondents without

rendering any cogent reasons etc.

Filed to-day
Registrar
31/10/16.

Respectfully Sheweth:

- 1) That Appellant has acquired qualification of M.A. Pashto and was appointed as P.T.C in Education Department on 17/10/1981. (Copy of Primary Teachers Certificate and Letter Dated 17/10/1981 are Annexure "A" & "B" respectively).

- 2) That, later on, a post of Assistant was advertised in Newspaper by the Office of District Co-ordination Officer Tank in which Appellant through its proper channel has applied and consequently appointed as Assistant vide Order Dated 10/05/2006. Thereafter, Appellant has performed his duties at different places as Political Naib Tehsildar. (Copies Application Dated 08/05/2006, Appointment Order Dated 10/05/2006, Letters are Annexure "C" to "E" respectively)
- 3) That during the course of service of Appellant, other employees/colleagues of Appellant have been promoted by Respondents. Appellant has also submitted his Appeal/Application Dated 14/07/2010 for the promotion of his service as Naib Tehsildar which was accordingly accepted vide Order Dated 13/10/2010 and consequently, Order Dated 04/11/2010 issued by Respondent 03. It is also important to bring into notice of this honourable Trinunal that Appellant has also appeared and passed the Departmental Examination of Naib Tehsildar in the year 2010.(Copy of Appeal Dated 13/07/2010, Order Dated 13/10/2010, Order Dated 04/11/2010, Result Declaration are Annexure "F" to "I" respectively)
- 4) That, thereafter, Appellant has performed his duties at various places and proper seniority list was also prepared which was not challenged by Respondents and attained finality in the eyes of law. As such, has created vested rights in favour of Appellant. (Copies of Seniority List of 2014, Seniority List of 2015 are Annexure "J" & "K" respectively)
- 5) That Respondent 02 has issued a notice against the promotion as Naib Tehsildar which was received by Appellant on 21/05/2011 and Appellant has reply the same and finally Promotion/Regularization of Appellant was withdrawn vide Order Dated 09/09/2016. (Copy of Notice received on 21/05/2016, Reply to Notive and Order Dated 09/09/2016 are Annexure "L" to "N" respectively)
- 6) That Appellant has preferred by filing a Departmental Appeal before Respondent 01 on 04/10/2016 which was rejected vide Order Dated 28/10/2016. (Copy of Departmental Appeal Dated 04/10/2016 and Rejection Order Dated 28/10/2016 are Annex "O" and "P" respectively)
- 7) That Appellant is being highly aggrieved from the Order Dated 09/09/2016 passed by Respondent 02 and Order Dated 28/10/2016 of Respondent 01 As such,

besech the indulgence of this Honorable Court by exercising its Original Writ Jurisdiction on the following


GROUNDS:

- a) The Order Dated 09/09/2016 of withdrawal of promotion of the service of Appellant is incorrect, illegal, void ab-initio, without jurisdiction, without lawful authority and worst example of misuse of powers vested under the law and in contravention to the well settled principle of law.
- b) The Respondent 03 was duty bound to act upon in accordance with law and himself violated the rules/regulations of the relevant provision of law and also violated the golden principle of fundamental rights as provided and protected under the Constitution of Islamic Republic of Pakistan, 1973. On this count too, Order Dated 09/09/2016 is liable to be set aside/struck down/withdrawal/cancelled.
- c) The Order Dated 09/09/2016 is result of mala fide, bias, without jurisdiction, without lawful authority and misuse of vested power and without application of judicial mind to the matter.
- d) The Respondent 03 was not competent to pass/issue the Order Dated 09/09/2016 against Appellant because the promotion order has been attained finality in the eyes of law and vested rights has been accrued in favour of Appellant. The time barred issue has been opened which is not permitted under the law. No legal foundation of law has been mentioned/referred before issuance of notice against Appellant which itself speak the malafide and colorable exercise of his power. The issuance of notice and then Order Dated 09/09/2016 is result of misinterpretation of the Orders Dated 13/10/2010 and 04/11/2010. Respondent 03 was not competent to take cognizance against Appellant and initiation of entire proceedings is without lawful authority, without jurisdiction and based in utter violation of well established principles of law.

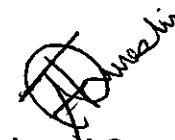
- e) The Respondent 03 has no legal authority/right to passed the Order Dated 09/09/2016 because Respondent 03 has become functus officio of the reasons that Respondent 03 has passed a Judicial Order Dated 13/10/2010 which has not been challenged by any one either department nor other colleagues and has attained finality in the eyes of law. This important legal aspect has not been considered before passing the Order Dated 09-09-2016. As such, the Order Dated 09/09/2016 is liable to struck down.
- f) That Appellant possess all the qualifications for the appointment to the post of "Naib Tehsildar" which was never objected by the Respondents/Department etc and vested rights have been accrued after the expiry of period of limitation. The issuance of Order Dated 09/09/2016 has infringed Appellant legal rights and Order Dated 09/09/2016 itself has no legal sanctity in the eyes of law.
- g) That no speaking/judicial Order has been passed by Respondent 03 while issuing the notice and then Order Dated 09/09/2016. Therefore, the Order Dated 09/09/2016 is liable to be struck down.
- h) That Appellant was promoted vide Order Dated 13/10/2010 and in consequent Order Dated 04/11/2010 was issued. After the lapse of more than Six (06) Years, Order Dated 09/09/2016 was passed and the issuance of notice is itself self-explanatory. Respondents have themselves violated the settled procedure of law as enshrined in the Efficiency and Discipline Rules 2011 otherwise.
- i) That Respondent 01 has passed the Order Dated 28/10/2016 is also incorrect, illegal, void ab-initio, without jurisdiction, without lawful authority and worst example of misuse of powers vested under the law and in contravention to the well settled principle of law. No cogent reason has been given in the said Order and does not fulfilled a legal/judicial Order in the eyes of law.

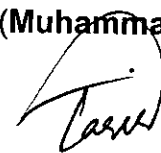
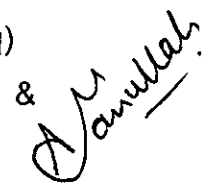
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It is, therefore, respectfully prayed that on acceptance of instant Appeal in hand, Orders Dated 28/10/2016 and 09/09/2016 may very graciously be declared as void ab-initio, without jurisdiction, without lawful authority, misuse of vested power and is contrary to the relevant statute/rules etc. Consequently, the Orders Dated 28/10/2010 and 09/09/2016 may very graciously be set aside/cancelled/withdraw and Order Dated 13/10/2010 and 04/11/2010 may be restored **AND** any other order deem proper may be passed in favour of Appellant against the Respondents.

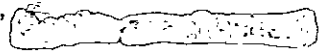

(Appellant)

Through


(Arshad Jamal Qureshi)
Advocate
Supreme Court of Pakistan
&

(Muhammad Tariq)

(Amanullah) & 
Advocates, High Court
Peshawar

Note:

Identical Appeals have been Admitted by this Honourable Tribunal in Appeal No. 781/2016 case titled as "Saeed Khan Versus SMBR" & Appeal No. 979/2016 titled as "Dildar Khan Vs Government" 


Advocate

BEFORE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

6

Appeal _____/2016

Abdul Jalil Versus The Government of K.P.K and other

Application for Suspension of the Office Order
Dated 09/09/2016 till the decision of the
Captioned Appeal in hand.

Respectfully Sheweach!

1. That the captioned Appeal has been filed along with application in hand.
2. That Applicant/Appellant is hope full of its success of the caption Appeal.
3. That if the impugned Office Order is not suspended till the decision of the caption appeal in hand than Appeal of the Applicant/Appellant will become infructious and Applicant/Appellant would suffered irreparable loss.
4. That Balance of convenience also lies in favour of Applicant/Appellant.
5. That grounds of Appeal may also be considered as part and parcel of application in hand.

It is, therefore, respectfully prayed that on acceptance of instant application, Office Order dated 09/09/2016 may very graciously be suspended till final disposal of Captioned Appeal in hand And any other order deem proper may be passed in the matter.



Through

Applicant/Appellant

(Signature)

(Arshad Jamal Qureshi)
Advocate,
Supreme Court of Pakistan

AFFIDAVIT

It is hereby solemnly affirm and declare on oath that contents of **Application** are true and correct to the best of my knowledge and belief and nothing has been kept from this Honorable Court.

(Signature)

Deponent

BEFORE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

7

Service Appeal _____/2016

ADDRESSES OF PARTIES

APPELLANT

Abdul Jalil, Political Naib Tehsildar, Barang Bajour Agency

RESPONDENTS

1. The Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat Peshawar
2. The Government of Khyber Pakhtunkhwa, Revenue and Estate Department through its Secretary, Civil Secretariat Peshawar
3. The Government of Khyber Pakhtunkhwa, Revenue and Estate Department through its Senior Member Board of Revenue, Civil Secretariat, Peshawar
4. The Additional Chief Secretary (FATA) FATA Secretariat, Warsak Road, Peshawar
5. The Deputy Secretary (Law & Order Department) FATA Secretariat, Warsak Road, Peshawar
6. Political Agent, South Waziristan, Agency

APPELLANT

Through



(Arshad Jamal Qureshi)
Advocate,
Supreme Court of Pakistan

EDUCATION DEPARTMENT N.-W.F. PROVINCE, PESHAWAR.



PRIMARY TEACHERS CERTIFICATE (SEMESTER SYSTEM)

A

8

Annex
A

Roll No. 52

Cumulative Letter Grade C

Cumulative G.P.A. 2.5

Certified that Abdul Jalil, son of Abdul Haleem,
resident of Kari Haider, Tehsil Kari Haider District FR D. I. Khan

born on 15-1-1964 (Fifteenth January Nineteen hundred & Sixty Four)

having passed the Primary Teacher Certificate Semester System is qualified to teach in the Primary Classes of a school for Men. Jamrod Phyber Agency

Trained at the Government Training School

Scored 19 80 19 81


Marks obtained.

1. Theory	577
2. Teaching Practice	123
Total	700
Percentage score	86%

Note:—This Certificate may be made permanent after three years approved service.

Dated Peshawar,
the 30th Sept: 81

Attested


Registrar,
Departmental Examinations,
Peshawar.

EDUCATION DEPARTMENT
N.W.F.P. PROVINCE, PESHAWAR

PRIMARY TEACHERS CERTIFICATE
(SEMESTER SYSTEM)

Roll No. 52

Commutative Letter Grade C
Commulative G.P.A. 2.5C

Certified that Abdul Jalil Son/Daughter Abdul Haleem
Resident of Kari Haider Tehsil Kari Haider District FR. D.I.Khan
Born on 15-1-1964 Fifteen th January Nineteen Hundred & Sixty Four
Having passed the Primary Teacher Certificate semestyor Syetem is qualified to teach in the primary classes of
a trained at the Government Training School for Men, Jamrud Khyber Agency.
Session 80 1981

Note: This certificate may be made
Permanent after three year
Approved service.

Marks obtained

- | | | |
|----|--------------------|-----|
| 1. | Theory | 577 |
| 2. | Teaching practice. | 123 |
| | Total | 700 |
| | Percentage score | 58% |

Signature in English
Registrar
Departmental Examination
Peshawar

Dated Peshawar
The 30th Sept, 1981

wf
Attested

as PTC

9) 17-10-1981

OFFICE OF THE AGENCY INSPECTOR OF SCHOOLS (FR) DERA ISMAIL KHAN.

APPOINTMENT ORDER.

Annex "B" 1/2

OFFICE ORDER. DATED 17 OCT: 1981

Consequent upon the completion of PTC Trg: Course the following candidates are hereby appointed as PTC Teachers at Rs.315/-PM fixed plus usual allowances as admissible under the rules in the schools noted against each wef. the date of taking over charges.

S.No.	Name of Teachers.	From	To	Remarks.
1.	Alam Shah	Candidate	GPS Bahrnee	Vice No.2
2.	Mohd Ishaq PTC	GPS Bahrnee	GPS Ishaq Shah	against vacant post vice Umer Khan Selected in PTC Trg:
3.	Nimatullah S/O Saadullah Khan.	Candidates.	GPS Landi No.2	Vacant post vice Abdul Wahab posted in Settled area.
4.	Amanullah S/O Dawar Khan.	-do-	GMS Morga (Pry: Section).	Vacant post vice Abdul Wahab posted in settled area.
5.	Mihar Khan S/O Saleh Khan.	-do-	GPS Chinasar.	Vacant post vice Shahbaz posted in settled area.
6.	Miro Khan S/O Hisar Khan.	-do-	GPS Landi Kuthar Zai.	Vacant post vice Faizullah posted in settled area.
7.	Roghan Khan S/O Sahib Khan.	-do-	GPS Ter Kanai	vacant post vice Gh: Qadir posted in Settled area.
8.	Abdul Jalil S/O Abdul Hakim.	-do-	GPS Karam Hezal	Vacant post vice Abdul Ahad posted in settled area.
9.	Alam Gir S/O Zar Gul Din.	-do-	GMS Landi Balaeh (Pry: Section)	Vacant post vice Gh: Mohd selected in PTC Trg:
10.	Akbar Ali S/O Asal Mir	-do-	GPS Mughal Kot	Vacant post.
11.	Nazamud Din S/O Abdur Rahim.	-do-	GPS Landi Astanader	vacant post vice Nasseer Mohd posted in settled area.

- Notes:-
1. The appointment of the above named candidates are being made purely on temporary basis which are liable to terminate at any any time without any notice are assiging any reason.
 2. Charges reports should be submitted to this office in duplicates.
 3. All the new candidates should produce Health & Age Certificates from the Medical Supdt: DI Khan before taking over charge.
 4. No TA/DA/TG is allowed.
 5. They will be allowed graded pay in NPS No.6 after the declaration of their PTC result.

(Signature) (MR. ATIS KUMAR)

Attested

OFFICE OF THE AGENCY INSPECTOR OF SCHOOLS (FR) DERA ISMAIL KHAN.

OFFICE ORDER.
DATED OCT:1981

APPOINTMENT ORDER.

Consequent upon the completion of PTC Trg. Course the following candidates are hereby appointed as PTC Teachers at Rs. 315/-PM fixed plus usual allowances as admissible under the rules in the schools noted against each wef the date of taking over charge.

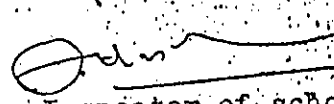
S.No.	Name of Candidate	From	To	Remarks.
1.	Alem Shah	Candidate	GPS Bahr	Vice No.2
2.	Mohd Ishaq PTC	GPS Bahr	GPS Ishaq Shah Kor;	Against vacant post vice Umër Khan Selec in settled area.

.....2.....

Endst:No. 2819-35/A-1PTC/ Dated . DIKhan the 17-10- /1981

Copy of the above is forwarded to :-

1. AAIS Sherani area. at Darazinda.
2. AAIS Bhattani area at Jandola.
3. Pay Clerk local office.
- 4.-11. All the Headmaster/Head Teachers of concerned schools.
- 12-22. All the candidates concerned. for tinformation and necessary action.


Agency Inspector of schools,
(FR) Dera Ismail Khan.

(R/SHIM)

^{up}
Attested

FIRST APP. OF P.T.C

OFFICE OF THE AGENCY INSPECTOR OF SCHOOLS (FR) DERA ISMAIL KHAN

OFFICE ORDER,
Dated 17 OCT: 1981

APPOINTMENT ORDER:

Consequent upon the completion of PTC Trg: Course the following candidates are hereby appointed as PTC Teachers at Rs.315/- PM fixed plus usual allowances as admissible under the rules in the schools noted against each w.e.f. the dated of taking over charges.

S.No.	Name of Teacher	From	To	Remarks
1	Alam Shah	Candidate	GPS Bahrnee	Vice No.2
2	Mohd Ishaq PTC	GPS Bahrnee	GPS Ishaq Shah	Against vacant post vide Umer Khan Selected in PTC Trg:
3	Nimatullah S/O Saadullah Khan	Candidates	GPS Landi No.2	Vacant post Vice abdul Wahab posted in settled area
4	Amanullah S/O Dawar Khan	-do-	GMS Morga(Pry:) Section	vacant post vice Abdul Wahab posted in settled area
5	Mihar Khan S/O Saleh Khan	-do-	GPS Chinasar	Vacant post vide shahbaz posted in settled area.
6	Miro Khan S/O Hisar khan	-do-	GPS Landi Kuther Zai.	Vacant post vice Faziullah posted settled area
7	Reghan Khan S/O Sahib khan	-do-	GPS Tor Kanal	Vacant post vice Chiqadir posted settled area.
8	Abdul Jalil S/O Abdul	-do-	GPS Karam Hezai	Vacant post vide Abdul Ahad posted in settled area
9	Alam Gir S/O Zar Gul Din	-do-	GM Landi Baloch (Pry : section)	Vacant post vice Gh: Mohd selected in PTC Trg:
10	Akbar Ali S/O Asal Mir	-do-	GPS Mughal Kot	Vacant post.
11	Nazamud Din S/O Abdur Rahim	-do-	GPS landi Astanadar	Vacant post vice naseer Mohd posted in settled area.

- Notes:-1. The appointment of the above named candidates are being made purely on temporary basis which are liable to terminate at any time without any notice are assigning any reason.
2. Charges reports should be submitted to this office in duplicates.
3. all the new candidates should produce Health & Age Certificates from the Medical Supdt: DIKhan before taking over charges.
4. No TA/DA/ TG is allowed.
5. They will be allowed graded pay in NPS No.6 after declaration of their PTC result .

Signature in English

Attested

The District Coordination Officer,
Tank.

(10) B

Proper Chennal:-

Subject:- APPLICATION FOR THE POST OF ASSISTANT (BPS-11).

Annex
"C"

Respected Sir,

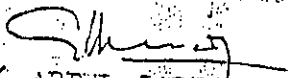
I beg to say that it is come to my notice through daily "Down" Islamabad dated: 06.05.2006 that some posts of Assistant (BPS-11) are lying vacant under your kind controll. I offer my self for the post mentioned in the subject cited above. My bio-data is as under:-

1. Name	Abdul Jalil
2. Father's Name:-	Abdul Haleem
3. Date of Birth	15.01.1964.
4. D/O Ist. Acptt: in Edu: Department:-	18.02.1982.
5. Domicile:-	Tank.
6. Qualifications:-	
i. Acad:	M.A (Pashto).
ii. Professional:-	C.T

It is therefore, requested, that I may kindly be appointed against the post of Assistant in BPS-11. I shall be very thankful to you for this act anticipation. Thanks.

Dated: 08/05/2006.

Yours Obediently,


(ABDUL JALIL S/O)
ABDUL HALEEM,
GHS, Maghwal (Dist: Tank).

"OFFICE OF THE EXECUTIVE DISTRICT OFFICER S&L TANK."

Encl: No. 8590

Dated Tank the 08-05- /2006.

Recommended & Forwarded to District Coordination Officer, Tank alongwith other relevant documents for information & with the request that this Office has no objection if he was then selected/appointed against the post of Assistant in BPS-11 please.


EXECUTIVE DISTRICT OFFICER,
SCHOOLS & LIBRARY, TANK.

my
Attested

The District Coordination Officer

Tank

Through Proper Channal:-

SUBJECT:- APPLICATION FOR THE POST OF ASSISTANT (BPS-11)

Respected Sir,

I beg to say that it is come to my notice through daily "Dawn" Islamabad dated : 06.05.2006 that some posts of Assistant (BPS-11) are lying vacant under your kind controll. I offer my self for the post mentioned in the subject cited above. My date is as under:

- | | |
|--|---------------|
| 1. Name | Abdul Jalil |
| 2. Father 's Name | Abdul Haleem |
| 3. Date of Birth | 15.01.1964 |
| 4. D/O Ist : Apptt:in Edu:
Department | 18.02.1982 |
| 5. Domicile | Tank |
| 6. Qualifications:- | |
| i. Acad: | M.A. (Pashto) |
| ii. Professional :- | C.T. |

It is therefore, requested thati may kindly be appointed against the post of Assistant in BPS-11. I shall be very thankful to you for this act anticipation. Thank.

Dated :08/05/2006

Yours obediently

Signature in English

(ABULD JALIL)

ABDUL HALEEM

GHS, Maghual (Distt: TANK)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER S & L TANK

Endst: No. 8580 / dated Tank the 08-05-2006.

Recommendation & forwarded to District Coordination Officer ,Tank alongwith other relevant documents for informatino & with the request that this office has no objection if he has been selected /appointed against the post of Assistant in BPS-11.

Signature in English

Executive district officer ,

School & literacy , Tank

Attested

OFFICE OF THE DISTRICT COORDINATION OFFICER, DISTRICT TANK.

No. 22/17 /Acctt.: Dated Tank the 10 /05/2006.

OFFICE ORDER.

Consequence upon the recommendation of the District Selection & Promotion Board, Tank in a meeting held on 09/05/2006 under the chairmanship of District Coordination Officer, Tank, Mr. Abdul Jalil s/o Abdul Haleem r/o Kirri Haider Tehsil & District Tank, presently working as CT Teacher GMS, Maghzai is hereby appointed as Office Assistant (BPS-11) plus usual allowances as admissible under the rules in the office of the Executive District Officer, (F&P), Tank with immediate effect in the best interest of public service.

143

Annex
"D"


DISTRICT COORDINATION OFFICER,
TANK.

No. 22/18-21 /Acctt.: Dated Tank the 10 /05/2006.

Copy to :-

- 1- The Executive District Officer, (F&P), Tank.
- 2- The Executive District Officer, (S&L), Tank.
- 3- The District Accounts Officer, Tank.
- 4- Official concerned.


DISTRICT COORDINATION OFFICER,
TANK.

u/
Attested

OFFICE OF THE DISTRICT COORDINATION OFFICER, DISTRICT TANK.

4339 GB Dated Tank the 15/09/2006

15/9
2006

OFFICE ORDER.

Mr. Abdul Jailal presently working as Office Assistant in the office of the EDO Finance & Planning Tank is hereby transferred and posted in the office of the Assistant Political Agent, FR Tank as Office Assistant (BPS-11) against vacant post with immediate effect in the best public interest.

12

DISTRICT COORDINATION OFFICER,
TANK.

Amer
E

4340-43 GB

Copy to :-

- 1- Executive District Officer, (F&P), Tank
- 2- District Accounts Officer, Tank
- 3- Assistant Political Agent, FR Tank
- 4- Official concerned.

DISTRICT COORDINATION OFFICER,
TANK.

uf
Attested



Establishment Section

A

FATA SECRETARIAT
(COORDINATION & ADMINISTRATION DEPARTMENT)
WARSAK ROAD PESHAWAR

-2-11-07

13

OFFICE ORDER :

The following posting/transfers are hereby ordered with immediate effect, in the interest of public service :-

S.No	Name & Designation	From	To	Remarks
1	Mr. Aslam Khan	Political Naib Tehsildar Jandola	Report to BOR	
2	Mr. Abdul Jalil	Office Assistant, Office of the APA FR Tank	Political Naib Tehsildar Jandola on his own pay scale	Vice No.1

ADDITIONAL CHIEF SECRETARY (FATA)

No.FS/E/100-57 (Vol-5)/9924-28

Dated: 24/11/2007

Copy to :-

1. Senior Member Board of Revenue NWFP
2. Accountant General NWFP
3. District Coordination Officer, FR Tank with reference to his letter No.4416/Poll.Asstt. dated 07-11-2007.
4. Accounts Officer, District Tank
5. Official concerned

(IHSANULLAH KHAN)
Section Officer, (Estab)

Attested

FATA SECRETARIAT

(Coordination & Administration Department)

WARSAK ROAD PESHAWAROFFICER ORDER :

The following posting /transfer are hereby order with immediate effect, in the interest of public service:-

S.No.	Name & Designation	From	To	Remarks
1.	Mr. Aslam Khan	Political Naib Tehsildar Jandola	Report to BOR	
2.	Mr. Abdul Jalil	Office Assistant Office of the APA FR Tank	Political Naib Tehsildar Jandole in his own pay scale	Voce No.1

ADDITIONAL CHIEF SECRETARY (FATA)

N.FS/E/100-57(Vol-5)/9924-28

Dated 22/11/2007

Copy to

1. Senior Member Board of Revenue NWFP
2. Accountant General NWFP
3. District Coordination Officer FR Tank with reference to this letter No. 4416/Poll, Asstt: dated 07-11-2007.
4. Accounts Officer District Tank
5. Official concerned.

Signature in English
(IHSANULLAH KHAN)
Section office (Estab)

*my
Attested*

OFFICE OF THE DISTRICT COORDINATION OFFICER/PA FR TANK

NO. 1305/PS Dated Tank the 6/14/2007

14

OFFICE ORDER

The following posting/transfer amongst the official of Assistant Political Agent FR Tank office is hereby ordered with immediately effect in the best public interest.

SNO	NAME OF OFFICIAL	DESIGNATION	FROM	TO
1	Abdul Jalil Khan	Office Assistant	I/C G/Branch	Account branch
2	Saifullah	Junior clerk	Account branch	Reader to APA

DISTRICT COORDINATION OFFICER
FR TANK

No. 1306-7/PS

- Copy to:
- (1) Assistant political Agent FR Tank
 - (2) Official Concerned for compliance

DISTRICT COORDINATION OFFICER
FR TANK



Establishment Section

FATA SECRETARIAT
COORDINATION & ADMINISTRATION DEPARTMENT
WARSAK ROAD PESHAWAR

15

OFFICE ORDER :-

The following posting/transfers are hereby ordered with immediate effect, in the interest of public service :-

S.No	Name & Designation	From	To	Remarks
1.	Mr. Aslam Khan	Political Naib Tehsildar Jandola	Report to BOR	
2.	Mr. Abdul Jalil	Office Assistant, Office of the APA FR Tank	Political Naib Tehsildar Jandola in his own pay scale.	Vice No.1

ADDITIONAL CHIEF SECRETARY (FATA)

No.FS/E/100-57 (Vol-5)/9924 -28

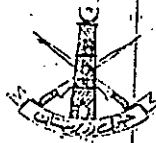
Dated: 22/11/2007

Copy to :-

1. Senior Member Board of Revenue NWFP
2. Accountant General NWFP
3. District Coordination Officer FR Tank with reference to his letter No.4416/Poll.Asstt: dated 07-11-2007.
4. Accounts Officer District Tank.
5. Official concerned


(IHSANULLAH KHAN)
Section Officer (Estab)

wf
Attested



16

OFFICE OF THE POLITICAL AGENT, SOUTH WAZIRISTAN AGENCY, TANK

OFFICE ORDER

No. 1754 /EC

Dated. 04 / 12 /2014

Mr. Abdul Jalil Political Naib Tehsildar (PNT) Mehsud Jandola is hereby directed to perform duties as the incharge of Agency Complaint Cell / Agency Redresal Cell established at Political Agent, South Waziristan Agency Compound, at Tank in addition to his own duties with immediate effect.

POLITICAL AGENT,
South Waziristan Agency, Tank

1755-60

No. _____ /Dev: EC



Copy to:

1. The Secretary Law & Order (FATA), FATA Secretariat Peshawar.
2. PS to Additional Chief Secretary (FATA), FATA Secretariat Peshawar.
3. The Additional Political Agent, South Waziristan Agency, Tank
4. The Assistant Political Officer, South Waziristan Agency, Tank
5. The Assistant Political Agent (M)Ladha, South Waziristan Agency
6. The Assistant Political Agent Wana, South Waziristan Agency

Attested

POLITICAL AGENT,
South Waziristan Agency, Tank

17

	<p>OFFICE OF THE COMMISSIONER DIKHAN DIVISION DIKHAN Phone # 0966-9280351 Fax No. 0966-9280352 commissionerdikhan@yahoo.com Secretarytocommissionerdik@gmail.com</p>	
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No. 1964 /Estt:Dated DIKhan the 17-4 /2015OFFICE ORDER

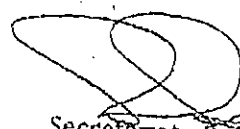
Following postings / transfers amongst Political Naib Tehsildars DIKhan Division are hereby ordered with immediate effect.

S.#	Name of Political Naib Tehsildars	From	To
1	Mr. Riaz ul Haq PNT	PNT Toi Khula SWA	PNT (Mehsud) Jandola SWA
2	Mr. Abdul Jalil PNT	PNT (Mehsud) Jandola SWA	PNT Toi Khula SWA
3	Mr. Yasir Salman Kundi	Waiting for posting	PNT Jandola FR Tank

Sd/-
Commissioner
DIKhan Division DIKhan

No. 1965-71 /Estt:

- Copy to:-
1. The Secretary Law & Order PATA Secretariat
 2. Deputy Commissioner Tank
 3. Political Agent SWA Tank
 4. Agency Accounts Officer, Tank
 5. PS to ACS FATA, FATA Secretariat Peshawar
 6. PS to Commissioner DIKhan Division
 7. Official Concerned for compliance.


Secretary to Commissioner
DIKhan Division DIKhan

17/4/2015

uf
Attested

OFFICE OF THE POLITICAL AGENT, SOUTH WAZIRISTAN AGENCY, TANK

No. _____ /S-32

Dated Tank the 20 /01/2016.

18

OFFICE ORDER

The following posting/transfer orders among the Political Naib Tehsildars/ ministerial staff is hereby ordered with immediate effect in the best public interest:-

Sr. #	Name of Official	From	To
1.	Mr. Allah Noor.	PNT Sarwekai.	PNT Sararogha
2.	Mr. Zafar Ali, J/Clerk	PNT Sararogha (officiating)	PNT Tiarza.
3.	Mr. Rehman Zada, J/Clerk.	PNT Ladha (officiating)	PNT Toi Khullah
4.	Mr. Abdul Jalil.	PNT Toi khulla	PNT Ladha.
5.	Mr. Qayum Nawaz, Mehsud	PM Sarwekai	To hold additional Charge of PNT Sarwekai
6.	Mr. Muhammad Ayub.	PNT Shakai	Report to HQr, Tank.

No joining time is allowed.

POLITICAL AGENT,
South Waziristan Agent, Tank

No. 240-47 /APO-SW

Copy to:-

1. The Assistant Political Officer, S.W.Agency, Tank.
2. The Assistant Political Agent, Ladha S.W.Agency, Tank.
3. The Assistant Political Wana, S.W.Agency.
4. The Political Naib Tehsildars (concerned).
5. The Superintendent, PA's Office, Tank.
6. The Accountant, PA's Office, Tank.
7. Rationing Assistant, PA's Office, Tank.
8. Officials concerned for strict compliance.

afh
POLITICAL AGENT,
South Waziristan Agent, Tank

Attested

OFFICE OF THE POLITICAL AGENT, SOUTH WAZIRISTAN AGENCY, TANK

No. 1277 /S-32

19

Dated Tank the 30 /03/2016.

OFFICE ORDER

The following posting/transfer orders among the Political Naib Tehsildars is hereby ordered with immediate effect in the best public interest :-

Sr. #	Name of Official	From	To
1.	Mr. Abdul Jalil.	PNT Ladha.	Report to Head Office.
2.	Mr. Allah Noor.	PNT Sararogha	He will look-after the affairs of the post of PNT Ladha till further orders.

No joining time is allowed.

Rth

POLITICAL AGENT,
South Waziristan Agent, Tank

No. 1278-83 /S-32

Copy to:-

1. The Assistant Political Officer, S.W. Agency, Tank.
2. The Assistant Political Agent, Ladha S.W. Agency, Tank.
3. The Superintendent, PA's Office, Tank.
4. The Accountant, PA's Office, Tank.
5. Rationing Assistant, PA's Office, Tank.
6. PNTs concerned for strict compliance.

Rth

POLITICAL AGENT,
South Waziristan Agent, Tank

Attested

OFFICE OF THE POLITICAL AGENT, SOUTH WAZIRISTAN AGENCY, TANK

No. 1465 /S-32

20

Dated Tank the 09 /04/2016.

OFFICE ORDER

The following posting/transfer orders among the Political Naib Tehsildar/ministerial staff is hereby ordered with immediate effect in the best public interest :-

Sr. #	Name of Official	From	To
1.	Mr. Abdul Jalil.	Waiting for posting Head Office, Tank.	PNT Tiarza.
2.	Mr. Zafar Ali, J/Clerk	PNT Tiarza (officiating)	PNT Ladha (officiating).

No joining time is allowed.

No. 1466-71 /S-32

Copy to:-

1. The Assistant Political Officer, S.W. Agency, Tank.
2. The Assistant Political Agent, Ladha S.W. Agency, Tank.
3. The Superintendent, PA's Office, Tank.
4. The Accountant, PA's Office, Tank.
5. The Rationing Assistant, PA's Office, Tank.
6. Officials concerned for strict compliance.

[Signature]
POLITICAL AGENT,
South Waziristan Agent, Tank

[Signature]
POLITICAL AGENT,
South Waziristan Agent, Tank

[Signature]
Attested

OFFICE OF THE POLITICAL AGENT, SOUTH WAZIRISTAN AGENCY, TANK

No. 2900 /S-32

(21)

Dated Tank the 20/07/2016.

OFFICE ORDER

The following posting/transfer orders among the Political Naib Tehsildar/ministerial staff is hereby ordered with immediate effect in the best public interest :-

Sr. #	Name of Official	From	To
1.	Abdul Jalil.	PNT Tiarza.	PNT Ladha.
2.	Zafar Ali, Mehsud J/Clerk	PNT Ladha (officiating)	PNT (Msd), Jandola (officiating).
3.	Muhammad Zaman, Wazlr, PM	Political Moharrir, Shakai	He is directed to look after the affairs of PNT Tiarza and coordinate with respective Army Formation/FC authorities of Tehsil Tiarza in addition to his own duties.
3.	Muhammad Ullah Mehsud, PM.	Political Moharrir, Tiarza.	Political Moharrir, Sararogha.
4.	Khairullah, Mehsud, PM	Political Moharrir, Sararogha.	Report to APA Ladha for further posting.
5.	Mir Khatim, Dottani, J/Clerk.	Waiting for posting.	Political Moharrir, Tiarza.
6.	Sheryar Mehsud:	APM Tiarza	Report for APO SWA for further posting.

No joining time is allowed.

[Signature]
POLITICAL AGENT,
South Waziristan Agent, Tank

No. 2901-07 /S-32

Copy to:-

1. The Assistant Political Officer, S.W. Agency, Tank.
2. The Assistant Political Agent, Wana - S.W. Agency.
3. The Assistant Political Agent, Ladha S.W. Agency, Tank.
4. The Superintendent, PA's Office, Tank.
5. The Accountant, PA's Office, Tank.
6. The Rationing Assistant, PA's Office, Tank.
7. Officials concerned for strict compliance.

[Signature]
POLITICAL AGENT,
South Waziristan Agent, Tank

Attested

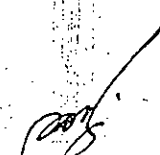
No. 2881 / APO, SW
Dated 04 / 07 / 2016

(22)

OFFICE ORDER.

The following officials will perform their duty at PA's Compound Tank during Eid-ul-Fiter holidays.

S, No	Period of duty	Name of Officials	Station
1.	5-7-2016 to 7-7-2016	Muhammad Ayub Political Naib Tehsildar, Sarwekai	PA's Compound Tank
2.	8-7-2016 to 10-07-2016	Abdul Jalil, Political Naib Tehsildar, Tiarza	-do-

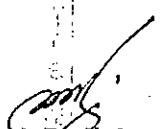

Assistant Political Officer,
South Waziristan Agency, at Tank.

No. 2882-84

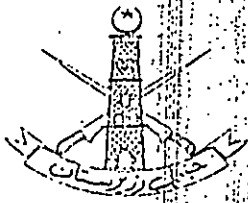
Copy to:

1). The Political Agent, South Waziristan Agency, at Tank for information please.

2). Official concerned.


Assistant Political Officer,
South Waziristan Agency, at Tank


Attested



OFFICE ORDER.

OFFICE OF THE ASSISTANT
POLITICAL OFFICER, SOUTH
WAZIRISTAN AGENCY AT TANK.

No. _____ /APO, SW
Dated 13 /07/2016.

The following officials will carry out pre-registration of returning TDPs of newly de-notified villages of Tehsil Sarwekai and left over villages of Tehsil Sarwekai at registration point PA's Compound Tank from 13th July to 25th July, 2016.

Sr.#	Name of Center	Name of Officer / Official	Specification of duties
1	Registration Center at PA's Compound, Tank Tehsil Sarwekai and left over villages of Tehsil Sarwekai.	1. Muhammad Ayub, PNT Sarwekai. 2. Qayum Nawaz, PM Sarwekai. 3. Muhammad Noor, PM Siplatol. 4. Abdul Jalil, PNT, Tiarza 5. Muhammad Ullah (PM, Tiarza) 3. Sher yar, (APM, Tiarza)	Center Incharge. Registration of DPs Family. Registration of DPs Family. Center Incharge. Registration of DPs Family. Registration of DPs Family.

The deputed staff is directed to be present at registration center inside PA's Compound Tank, from 08 AM to 4 PM for duty.

Assistant Political Officer,
South Waziristan Agency, Tank

No. 2901-5
Copy to:

1. The Political Agent, South Waziristan Agency, at Tank for information please.
2. The Headquarters 9 Division (Main) JSC Wana for information please.
3. Assistant Political Agent, Ladha South Waziristan Agency, at Tank
4. The Agency Coordinator, FDMA South Waziristan Agency, at Tank.
5. Officials concerned for compliance.

Attested



OFFICE OF THE
COMMISSIONER MALAKAND DIVISION
SAIDU SHARIF SWAT

24

Dated 10/08/2016

OFFICE ORDER

No. 3265 /2/18/Estt: In pursuance of the FATA Secretariat, Law & Order Department, Peshawar Order/Endst:No.FS/L&O/37/2016/2429-32, dated 05.8.2016 and Political Agent, Bajaur letter No.3411/S/P&T, dated 17.06.2016, Mr. Abdul Jalil, Naib Tehsildar (BPS-14) is hereby posted against the vacant post of Political Naib Tehsildar, Barang, Bajaur Agency with immediate effect.

By Order
COMMISSIONER MALAKAND DIVISION

No. 3266-70 /2/18/Estt:

Copy forwarded to:-

1. The Deputy Secretary, Law & Order Department, FATA Secretariat, Peshawar for information, please.
2. The Political Agent, Bajaur for information & necessary action, please.
3. The Agency Accounts Officer, Bajaur for information, please.
4. The official concerned for compliance.
5. Office Order File.

[Signature]
**SECRETARY TO COMMISSIONER
MALAKAND DIVISION**

[Signature]
Attested

[Signature]
Assistant Political Officer

C No. 195/2010

BEFORE SENIOR MEMBER BOARD OF REVENUE,
PESHAWAR

25

Annex
B

Abdul Jalil S/O Abdul Haleem,
Political Naib Tehsildar, Thoy Khullah, Wana, South Waziristan.
.....Petitioner

Versus

Muhammad Sajid Saleem,
Political Tehsildar, Bannu Division, Bannu.
Ex-Political Naib Tehsil, Dara Zenda, F.R D.I.Khan.
.....Respondents

Recd to SMAR

<=><=><=><=><=><=><=><=>

**APPEAL FOR REGULARIZATION OF SERVICES
OF APPELLANT AS NAIB TEHSILDAR BPS-14.**

<=><=><=><=><=><=><=><=>

SMAR
14/7/2010

Respectfully Sheweth:

1. That appellant was initially appointed as PTC Teacher on 07.02.1982.
2. That after advertising of the posts of Assistants by District Coordination Officer, Tank, appellant applied to the same through proper channel and on going through the prescribed procedure of selection, he was recommended by the Departmental Selection Committee as such and was then appointed as Assistant BPS-14 vide order dated 10.05.2006 and was posted in Finance and Planning Section, however, he was then transferred to the office of APA, F.R Tank vide order dated 15.09.2006. At present appellant is performing his duties as Political Naib Tehsildar under A.P.A, Wana, South Waziristan.

inf
Attached

3. That appellant during this period served the APA Office F.R Tank from 16.10.2007 to 25.11.2007, Political Naib Tehsildar, F.R Tank (Jendola) from 26.11.2007 to 15.12.2008, Political Naib Tehsildar Makeen (SWA) from 16.10.2008 to 22.02.2009 and Political Naib Tehsildar, Thoy Khullah (SWA) from 23.02.2009 till date. (Copy as annex "A").
4. That on 22.12.2008, respondent submitted appeal before your honour for regularization of his services as Naib Tehsildar and thereafter on 04.02.2009, your honour was pleased to accept the appeal of respondent by selecting/ promoting him to the post of Naib Tehsildar on regular basis with immediate effect. (Copy as annex "B").
5. That the Board of Revenue sought for service profile from the respondents for regularization of services of appellant, which was submitted by respondent No.1 on 14.03.2009 to your honour office. (Copy as annex "C").
6. That on 23.04.2009, District Coordination Officer, Tank submitted report to the Board that appellant has neat and clean service, remarkable performances, experience in public matters/ dealing/ routine work. Till date no complaint was ever made against him either by the public or by the Department and he is recommended for posting on permanent basis as Naib Tehsildar. (Copy as annex "D").

Attested

7. That since 22.11.2007, appellant is serving the Department as Political Naib Tehsildar, but in own pay scale on acting/ temporary charge basis.
8. That the grade of Assistant and Political Naib Tehsildar carry equal pay scale of BPS-14.
9. That respondent was basically Junior Clerk BPS-5 and was required to be promoted to the post of Senior Clerk and thereafter to the post of Assistant and then to the post of Naib Tehsildar, but he was directly promoted from the post of Junior Clerk BPs-5 to the post of Naib Tehsildar BPS-14 on regular basis while appellant was even not considered for the purpose.
10. That order of respondent dated 04.02.2009 was in total disregard of law and rules.
11. That the post of Naib Tehsildar is a selection post, which is required to be filled in on the basis of recommendations of Departmental Selection Committee and not the DPC as enshrined in the provisions of N.W.F.P, Civil Servant Act, 1973.
12. That services of respondent were regularized as Naib Tehsildar on regular basis in absence of any recommendation of Departmental Selection Committee.
13. That appellant is serving as Naib Tehsildar but in own pay and scale which means that sanction post is available with the Department.

Attested

14. That services of respondent were not only regularized as Naib Tehsildar but he was further promoted now to the post of Tehsildar at Bannu.

It is, therefore, most humbly requested that on acceptance of this appeal, services of appellant be made regularized w.e.f 22.11.2007 as Naib Tehsil with all back benefits by setting aside order dated 04.02.2009 of respondent, with such other relief as may be deemed proper and just in circumstances of the case.

Appellant



ABDUL JALIL

Dated: 13.07.2010

Attested

IN THE COURT OF AHSANULLAH KHAN, SENIOR MEMBER,
BOARD OF REVENUE, KHYBER PAKHTUNKHWA.

Case No. 195/2010,
Date of Institution. 14/07/2010.
Date of Decision. 13/10/2010.

29

Abdul Jalil Political Naib Tehsildar, Thoy Khullah, Wana, South Waziristan Agency

-----Appellant.

Versus

Muhammad Sajid Saleem, Political Tehsildar, Bannu Division, Bannu

-----Respondent.

ORDER

This is a departmental appeal filed by Abdul Jalil Political Naib Tehsildar, (Own Pay & Scale) Thoy Khullah, Wana, South Waziristan Agency for regularization of his services as Naib Tehsildar (BPS-14).

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Brief facts of the case as mentioned in the appeal are that the appellant was appointed as PTC Teacher on 07/02/1982. On occurrence of post of Assistant (BPS-14) in the office of District Coordination Officer, Tank he was selected and appointed as Assistant (BPS-14) in the office of District Coordination Officer, Tank through proper Departmental Selection Committee on 10/05/2006. The appellant was posted as Political Naib Tehsildar (Own Pay & Scale) FR, Tank (Jandola) on 22/11/2007 by FATA Secretariat and now performing his duty as Political Naib Tehsildar, Thoy Khullah since 23/02/2009. The appellant has now come up with the request for regularization of his service as Naib Tehsildar for the reason that respondent namely Muhammad Sajjid Saleem being Junior Clerk was promoted as Naib Tehsildar (BPS-14) on regular basis and as such the appellant being Assistant (BPS-14) is also illegible for promotion as Naib Tehsildar (BPS-14) on regular basis under the rules.

The learned counsel for the appellant present. Arguments heard. Comments offered by Assistant Secretary (Estt), Board of Revenue, Khyber Pakhtunkhwa considered and case file perused:

The learned counsel while arguing the case contended that the appellant is basically Assistant (BPS-14) of the office of Assistant Political Agent FR, Tank and is eligible for promotion to the post of Naib Tehsildar (BPS-14) under the rules. He also added that the appellant has ample experience in Revenue and Political Administration and serving as Political Naib Tehsildar (Own Pay & Scale) since 22/11/2007. The learned counsel further submitted that the appellant is already holding the post of Naib Tehsildar and his regular

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Annex
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promotion as Naib Tehsildar (BPS-14) will not affect any one nor dispossess other official from the post of Naib Tehsildar.

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Keeping in view the above, the appellant deserves to be promoted as Naib Tehsildar (BPS-14) on regular basis under the rules. The appeal is therefore accepted and the appellant is promoted as Naib Tehsildar (BPS-14) on regular basis with immediate effect.

Announced.
13-10-2010.


(AHSANULLAH KHAN)
SENIOR MEMBER,
BOARD OF REVENUE,
KHYBER PAKHTUNKHWA.

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
REVENUE & ESTATE DEPARTMENT

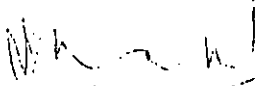
PESHAWAR DATED 4/11/2010

31

ORDER

No. _____ /Admn:V/(DIKhan). In pursuance of Judicial order dated 04.02.2009 passed by the court of Senior Member, Board of Revenue, Khyber Pakhtunkhwa Mr. Abdul Jalil Naib Tehsildar (Own Pay & Scale) Thoy Khullah Wana, South Waziristan is hereby promoted as Naib Tehsildar on regular basis with immediate effect.

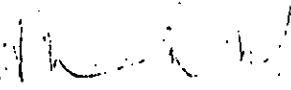
Annex
H


Senior Member
Board of Revenue Khyber Pakhtunkhwa

No. 21361-68 /Admn:V/(DIKhan).

Copy to the:-

1. Commissioner, DIKhan.
2. Political Agent South Waziristan.
3. District Coordination Officer *DIKhan Tank*.
4. Agency Account Officer South Waziristan Agency.
5. District Accountant Officer, *DIKhan Tank*.
6. Official Concerned.
7. Personal File.
8. Office Order File.


Senior Member
Board of Revenue Khyber Pakhtunkhwa

of
Attached

GOVERNMENT OF
KHYBER PAKHTUNKHWA
REVENUE & ESTATE DEPARTMENT

Peshawar dated 4/11/2010

ORDER

No _____/Admn; V/(DIKhan). In pursuance of Judicial order dated 04.02.2009 passed by the court of Senior Member, Board of Revenue, Khyber Pakhtunkhwa Mr. Abdul Jalil Naib Tehsildar (Own Pay & Scale) Thoy Khullah Wana, South Waziristan is hereby promoted as Naib Tehsildar on regular basis with immediate effect.

Signature in English

Senior Member

Board of Revenue Khyber Pakhtunkhwa

No.21361-68/Admn:V/(DIKhan)

Copy to the:-

1. Commissioner, DIKhan
2. Political Agent South Waziristan.
3. District Coordination Officer Tank.
4. Agency Account Officer , South Waziristan Agency
5. District Accountant Officer, Tank
6. Official Concerned
7. Personal File
8. Office Order file.

English

Signature in

Senior Member

Board of Revenue Khyber Pakhtunkhwa

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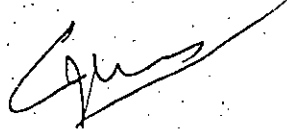
32

DIRECTORATE OF LAND RECORDS, KHYBER PAKHTUNKHAWA.

TO WHOM IT MAY CONCERN:

Annex
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This is to certify that Mr. Abdul Jalil S/O Abdul Halim Khan, Political Naib Tehsildar, South Waziristan appeared in the Departmental Examination of Naib Tehsildar held in the month of January, 2010 at Peshawar declared passed in all papers under R. No. 175 vide Notification No.1825-69/LR-I/DENT/2009-10 dated, 20/02/2010.


SUPERINTENDENT,
LAND RECORDS, KHYBER
PAKHTUNKHAWA
SUPERINTENDENT
Land records
Khyber Pakhtunkhwa
Peshawar

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GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT

Peshawar dated the 16/07/2015

OFFICE ORDER

Annex
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No. Estt:V/ SL/Naib Tehsildar/2014/ 8948. In pursuance of Section 8 (i) of the Khyber Pakhtunkhwa, Civil Servants Act, 1973, final seniority list of Naib Tehsildar (BPS - 14) in Khyber Pakhtunkhwa as it stood on 31.12.2014 is hereby published for information of all concerned.

By order of
Senior Member

No. Estt:V/ SL/Naib Tehsildar/2014/ 8949-73

Copy alongwith a copy of Final Seniority List is forwarded to:-

1. All Deputy Commissioners in Khyber Pakhtunkhwa They are requested to circulate the same amongst the Naib Tehsildar working under your control.
2. Office order file.

M
Secretary - I
A.

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FINAL SENIORITY LIST OF NAIB TEHSILDAR (BPS - 14) IN KHYBER PAKHTUNKHWA AS STOOD ON 31.12.2014

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S.No.	Name of Naib Tehsildar / Qualification	Date of Birth / Domicile	Date first entry into Government Service	Date of appointment as Naib Tehsildar on regular basis	method of Recruitment	remarks
1.	Mr. Abdul Qadeer (MSc)	15.8.1962 DIKhan	28.08.1995	28.08.1995	Promotee	Appointed as Tehsildar(B-16) on ACB
2.	Mr. Bashir Ahmad (FA)	10.04.1955 Nowshera	28.07.1973	12.10.2002	--do--	Posted as Tehsildar on CCB
3.	Mr. Naz Amin Khan (Matric)	12.05.1960 Bajuar	25.11.1981	13.01.2003	--do--	--do--
4.	Mr. S.Asghar Shah (Matric)	25.12.1959 Haripur	25.05.1981	30.06.2003	--do--	--do--
5.	Mr. Said Rehman (Matric)	30.10.1958 Mardan	01.10.1980	22.11.2004	--do--	--do--
6.	Mr. Kiramatullah Kundi (B.A)	03.03.1974 Tank	29.11.2004	29.11.2004	Direct	Appointed as Tehsildar(B-16) on ACB
7.	Mr. Abdur Rehman Shah (BA)	15.02.1985 Bannu	23.01.2007	23.01.2007	--do--	--do--
8.	Mr. Sarir Ahamd (Matric)	13.05.1955 Peshawar	28.02.1977	31.05.2007	Promotee	Posted as Tehsildar on CCB
9.	Muhammad Riaz (Matric)	22.05.1958 Nowshera	06.08.1978	31.05.2007	--do--	--do--
10.	Mr. Atta Ullah (Matric)	1.04.1956 Charsadda	06.11.1978	31.05.2007	--do--	--do--
11.	Mr. Musadiq Hussain (Matric)	21.08.1955 Hangu	12.05.1973	31.05.2007	--do--	--do--
12.	Muhammad Nawaz (F.A)	30.03.1957 Mardan	20.05.1976	31.05.2007	--do--	--do--
13.	Mr. Mir Laiq (F.A)	27.04.1963 Mardan	08.03.1983	31.05.2007	--do--	--do--
14.	Muhammad Bashir (F.A)	10.12.1956 Haripur	01.11.1976	20.07.2007	--do--	--do--
15.	Mr. Ghulam Sarwar (Matric)	01.03.1955 Shangla	01.03.1978	20.07.2007	--do--	--do--
16.	Mr. Said Rahim (Matric)	15.04.1957 Swat	04.09.1976	20.07.2007	--do--	--do--
17.	Mr. Fazli Raziq (B.Com)	01.05.1955 Swat	06.04.1981	20.07.2007	--do--	--do--
18.	Mr. Asmat Ullah (Matric)	13.03.1959 Lakki Marwat	28.04.1982	26.07.2007	Promotee	--do--

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19.	Mr. S. Mazhar Hussain Shah (F.A)	07.07.1956 DIKhan	10.05.1976	26.07.2007	Promotee	Naib Tehsildar
20.	Mr. Hussain Bakhsh (Matric)	13.04.1956 DIKhan	01.09.1976	26.07.2007	--do--	Posted as Tehsildar on CCB
21.	Mr. Abdur Rashid (F.A)	01.09.1955 Tank	01.07.1984	26.07.2007	--do--	--do--
22.	Mr. Fateh Ullah (F.A)	10.10.1958 Tank	01.07.1984	26.07.2007	--do--	--do--
23.	Muhammad Akram (Matric)	03.10.1959 Tank	01.12.1983	26.07.2007	--do--	--do--
24.	Mr. Mulazim Hussain (Matric)	01.01.1957 Tank	05.07.1984	26.07.2007	--do--	--do--
25.	Mr. Afzal Khan (F.A)	15.03.1959 Swat	05.04.1981	01.09.2007	--do--	--do--
26.	Muhammad Farooq Anwar (Matric)	10.09.1958 Tank	23.12.1985	01.01.2008	--do--	Naib Tehsildar
27.	Mr. Kutab Khan (F.A)	22.05.1956 Tank	02.07.1986	01.01.2008	--do--	Posted as Tehsildar on CCB
28.	Mr. Ghulam Qasim (FA)	28.08.1958 DIKhan		01.01.2008	--do--	--do--
29.	Mr. Qudratullah (Matric)	20.02.1959 DIKhan	01.09.1977	01.01.2008	--do--	Naib Tehsildar
30.	Mr. Aftab Hussain Shah (B.A)	04.05.1958 DIKhan	13.09.1980	01.01.2008	--do--	--do--
31.	Mr. Sikandar Hayat Shah (Matric)	20.01.1958 Bannu	18.02.1981	05.01.2008	--do--	--do--
32.	Mr. Ghulam Abbas (Matric)	15.02.1958 Lakki Marwat	11.11.1982	05.01.2008	--do--	--do--
33.	Mr. Saleem Asmat (BA)	03.01.1959 DIKhan	27.03.1984	31.03.2008	--do--	Promoted through Administative order of SMBR
34.	Mr. Habib Ahmad B.A	04.04.1955 Swat	06.04.1981	02.04.2008	--do--	Naib Tehsildar
35.	Mr. Himayat Ullah Qureshi (B.A)	06.11.1958 Tank	10.01.1978	02.04.2008	--do--	--do--
36.	Mr. Abdullah Jan (FA)	17.10.1958 Charsadda.	01.09.1977	08.05.2008	--do--	--do--
37.	Mr. Muhammad Ziafat (F.A)	12.02.1955 Abbottabad.	06.10.1976	08.05.2008	--do--	--do--
38.	Mr. Naimat Ullah Khan (BA)	11.08.1967 Tank	16.06.1990	08.05.2008	--do--	--do--
39.	Mr. Naik Muhammad (B.A)	04.04.1971 Kohat	26.07.1995	10.05.2008	--do--	--do--
40.	Mr. Miraj Muhammad (F.A)	30.09.1958 Charsadda	31.05.1975	12.05.2008	--do--	--do--
41.	Mr. Amanullah (Matric)	09.06.1956 Tank		29.05.2008	--do--	Promoted through Administative order of Senior Member, Board of Revenue,
42.	Mr. Shah Zaman (F.A)	16.07.1958 Tank	03.07.1984	29.05.2008	--do--	--do--

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43	Mr. Abdul Rashid (Matric)	1958 DIKhan	1987	29.05.2008	Promotee	Promoted through Administative order of SMBR
44	Muhammad Ayub (Matric)	04.11.1960 Tank	18.12.1986	29.05.2008	--do--	--do--
45	Mr. Amir Muhammad (B.A)	06.04.1961 Swabi	28.08.1988	11.08.2008	--do--	Naib Tehsildar
46	Mr. Shakir Ullah (MA, MBA)	15.01.1978 Khyber Agency	02.02.2009	02.02.2009	Direct	--do--
47	Mr. Munir Ahmad (MSc)	20.03.1979 SWA	02.02.2009	02.02.2009	--do--	--do--
48	Mr. Rahamd Ullah khan (MSc. Chem)	18.04.1978 Lakki Marwat	02.02.2009	02.02.2009	--do--	--do--
49	Mr. Imtiaz Ali Shah (MSc)	14.04.1980 Karak	02.02.2009	02.02.2009	--do--	--do--
50	Mr. Khalid Khan (MA)	23.03.1978 Bajuar	02.02.2009	02.02.2009	--do--	--do--
51	Mr. Fazli Wadood (BA)	04.04.1982 Mohmand Agency	02.02.2009	02.02.2009	--do--	--do--
52	Mr. Irshad Ali (MA)	15.03.1978 Mohmand Agency	02.02.2009	02.02.2009	--do--	--do--
53	Mr. Amir Nawaz (BSc/MBA)	22.04.1975 DIKhan	02.02.2009	02.02.2009	--do--	--do--
54	Mr. Shah Wazir (MSc)	30.03.1980 SWA	02.02.2009	02.02.2009	--do--	--do--
55	Mr. Sikandar Khan (M.A)	10.12.1976 Swat	02.02.2009	02.02.2009	--do--	--do--
56	Mr. Ishtiaq Ahmad Khan (M.A)	30.04.1979 Malakand	02.02.2009	02.02.2009	--do--	--do--
57	Mr. Shamsul Islam (MA)	10.04.1979 Malakand	02.02.2009	02.02.2009	--do--	--do--
58	Mr. Allah Noor (MA)	11.04.1983 (FR) DIKhan	02.02.2009	02.02.2009	--do--	--do--
59	Muhammad Ilyas (MSc)	03.03.1975 Swat	02.02.2009	02.02.2009	--do--	--do--
60	Mr. Yasir Salman Kundi (MBA)	03.08.1979 Lakki Marwat	02.02.2009	02.02.2009	--do--	--do--
61	Mr. Yadullah Khan Khattak (MA)	23.05.1979 Mardan	02.02.2009	02.02.2009	--do--	--do--
62	Mr. Ahmad Hashmi (B.A)	2.04.1983 Dir Lower	02.02.2009	02.02.2009	--do--	--do--
63	Mr. Amin Ullah Khan (BA)	07.06.1977 DIKhan	02.02.2009	02.02.2009	--do--	--do--
64	Mr. Islahuddin (BA.LLB)	15.04.1982 Mardan	02.02.2009	02.02.2009	--do--	--do--

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63.	Mr. Zahid Younis (M.A)	20.01.1978 Karak	02.02.2009	02.02.2009	Direct	Naib Tehsildar
66.	Mr. Naimat Ullah (Double M.A)	26.04.1973 Dir	02.02.2009	02.02.2009	--do--	--do--
67.	Muhammad Riaz (LLB)	02.02.1980 Dir Lower	02.02.2009	02.02.2009	--do--	--do--
68.	Muhammad Yar (MA)	02.02.1979 Malakand	02.02.2009	02.02.2009	--do--	--do--
69.	Mr. Sher Ali Khan (M.A)	13.11.1974 Swat	02.02.2009	02.02.2009	--do--	--do--
70.	Mr. Munawar Shah (M.A)	12.02.1973 Dir Lower	02.02.2009	02.02.2009	--do--	--do--
71.	Mr. Iftikhar uddin (MSc)	05.08.1973 Charsadda	02.02.2009	02.02.2009	--do--	--do--
72.	Mr. Younis Khan (M.A)	15.06.1981 Upper Dir	02.02.2009	02.02.2009	--do--	--do--
73.	Mr. Mujahid Ali (M.A)	19.04.1974 Nowshera	02.02.2009	02.02.2009	--do--	--do--
74.	Syed Abdul Akbar Shah (MSC/M.A)	11.04.1981 Mardan	02.02.2009	02.02.2009	--do--	--do--
75.	Syed Sultan Haider Shah (BA. LLB)	08.12.1972 Peshawar	02.02.2009	02.02.2009	--do--	--do--
76.	Mr. Aftab Ahmad (MSc)	08.12.1982 Peshawar	02.02.2009	02.02.2009	--do--	--do--
77.	Mr. Dil Nawaz Khan (LLB)	22.03.1979 Swabi	02.02.2009	02.02.2009	--do--	--do--
78.	Mr. Kifayat Ullah (M.A)	09.01.1977 Peshawar	02.02.2009	02.02.2009	--do--	Removed from service on 26.5.2014
79.	Mr. Faqir Hussain (BA)	10.10.1983 Nowshera	02.02.2009	02.02.2009	--do--	Naib Tehsildar
80.	Mr. Zulfiqar Khan (M.Com)	15.04.1983 Peshawar	02.02.2009	02.02.2009	--do--	--do--
81.	Mr. Waqar Ahmad (M.A)	24.04.1980 Mansehra	02.02.2009	02.02.2009	--do--	--do--
82.	Muhammad Faraz Qurashi (MBA)	17.03.1982 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
83.	Mr. Fazal ur Rehman (M.A)	10.07.1975 Haripur	02.02.2009	02.02.2009	--do--	--do--
84.	Mr. Farukh Jadoon (BSc)	04.05.1984 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
85.	Mr. Fayaz Ahmad (M.A)	10.03.1982 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
86.	Bilal Ahmad (BA. B.Ed)	10.10.1978 Haripur	02.02.2009	02.02.2009	--do--	--do--
87.	Mr. Tanveer Shahzad (M.A)	30.12.1977 Mansehra	02.02.2009	02.02.2009	--do--	Naib Tehsildar
88.	Mr. Ejaz Ahmad (3 - M.A)	15.04.1982 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
89.	Muhammad Salim (BSC)	03.05.1978 Abbottabad	02.02.2009	02.02.2009	--do--	--do--

Attended

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	Mr. Sajid Saleem (MA Political Science)	01.04.1978 Tank	06.11.1996	10.02.2009	Promotee	Promoted through Administrative order of SMBR
91.	Mr. Adil Waseem (BA)	25.12.1988 Nowshera	27.02.2009	27.02.2009	Direct	Dismissed from service on 23.7.2014
92.	Mr. Tanzil-ur-Rehman	13.02.1988 NWA	14.04.2009	14.04.2009	--do--	Naib Tehsildar
93.	Mr. Abdul Qayum (BA)	24.04.1974 Kohistan	27.12.1993	02.05.2009	Promotee	--do--
94.	Mr. Roohul Amin (Matric)	25.10.1966 Kohat	01.04.1985	02.05.2009	--do--	--do--
95.	Mr. Qianoos Khan (BA)	14.02.1962 Kohat	01.07.1991	02.05.2009	--do--	--do--
96.	Mr. Khurshid Ali (Matric)	19.01.1956 Malakand	05.12.1991	02.05.2009	--do--	--do--
97.	Mr. Latif-ur-Rehman (Matric)	01.07.1959 Shangla	01.03.1978	02.05.2009	--do--	--do--
98.	Mr. Jehan Wali (FA)	01.02.1957 Shangla	01.03.1978	02.05.2009	--do--	--do--
99.	Mr. Amir Zarin (Matric)	06.08.1959 Shangla	01.03.1978	02.05.2009	--do--	--do--
100.	Mr. Shah Wazir (Matric)	02.02.1960 Swat	05.04.1981	02.05.2009	--do--	--do--
101.	Mr. Sher Bahadar (BA)	07.04.1965 Tank	10.10.1992	02.05.2009	--do--	--do--
102.	Mr. Shaukat Iqbal (M.A)	2/11/1973 DIKhan	19.10.1992	02.05.2009	--do--	--do--
103.	Mr. Abdur Rashid (MSC)	05.01.1962 Swabi	28.08.1988	02.05.2009	--do--	--do--
104.	Mr. Ahmad Ali M.A (B.ed)	17.04.1962 Swabi	28.08.1988	02.05.2009	--do--	--do--
105.	Mr. Faramosh Khan (BA)	01.12.1957 Bajaur	26.11.1975	12.05.2009	--do--	Promoted through Administrative order of SMBR,
106.	Mr. Abdul Haseeb (Matric)	01.09.1959 Bajaur	18.02.1977	12.05.2009	--do--	--do--
107.	Mr. Shakeel Ahmad (MA)	03.07.1971 Charsadda	13.09.1992	12.05.2009	--do--	Reverted to his original post of Political Moharir
108.	Mr. Gohar Ali (B.A)	31.03.1980 Bannu	29.05.2009	29.05.2009	Direct	Naib Tehsildar
109.	Mr. Mehmood Shah (Matric)	01.02.1959 Peshawar	04.10.1977	02.06.2009	Promotee	--do--
110.	Mr. Sher Dil (BA)	24.01.1974 Kohistan	10.04.1995	02.06.2009	--do--	--do--
111.	Muhammad Shoaib (BA)	01.01.1968 Kohat	09.12.1990	02.06.2009	--do--	--do--
112.	Mr. Muhammad Arshad (BA)	20.01.1967 Kohat	02.09.1984	26.06.2009	--do--	--do--
113.	Mr. Zafar Iqbal (B.A. L.L.B)	25.02.1963 Kohat	02.04.1987	02.07.2009	--do--	--do--
114.	Mr. Nawab Gul (M.A)	15.11.1966 Kohat	01.01.1995	02.07.2009	--do--	--do--

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115.	Mr. Umbaras Khan (B.A)	30.06.1960 Mardan	30.08.1988	07.07.2009	Promotee	Naib Tehsildar
116.	Mr. Shakeel-ul-Rehman	10.02.1978 Bannu	06.01.2009	11.07.2009	Direct	--do--
117.	Mr. Shiekh Muhammad Jamil (M.A)	15.02.1964 DIKhan	21.10.1992	18.07.2009	Promotee	--do--
118.	Mr. Bashir Ahmad (F.A)	01.01.1957 DIKhan	10.12.1983	18.07.2009	--do--	--do--
119.	Mr. Shehryar Khan (Matric)	01.10.1961 Mohmand Agency	13.09.1983	25.07.2009	--do--	Reverted to his original post of Political Moharir
120.	Mr. Hazrat Khan (Matric)	02.02.1956 Mohamand Agency	08.10.1986	10.09.2009	--do--	--do--
121.	Sardar Yousaf (BA)	15.03.1959 Bajaur	22.02.1978	17.09.2009	Promotee	Promoted through Administrative order of SMBR,
122.	Mr. Saz Muhamamd (BA)	01.02.1963 Bajaur	25.11.1981	17.09.2009	--do--	--do--
123.	Mr. Ghulam Saeedullah (FA)	01.01.1957 Bajaur	24.11.1975	18.09.2009	--do--	--do--
124.	Mr. Abdul Malik (FA)	01.08.1955 Bajaur	24.11.1975	26.09.2009	--do--	--do--
125.	Mr. Muhammd Saeed	Peshawar		30.09.209	--do--	--do--
126.	Mr. Riaz-ul-Haq (BA)	11.01.1969 Bajaur	04.07.1987	22.10.2009	--do--	--do--
127.	Mr. Umar Said (BA)	16.10.1960 Mardan	05.09.1988	07.01.2010	--do--	Reverted to his original post of Assistant
128.	Mr. Jehanzeb Khan (BA)	01.04.1965 Malakand	13.12.1982	08.01.2010	--do--	Promoted through Administrative order of SMBR,
129.	Mr. Asmatullah (BA)	25.05.1973 NWA	01.06.1996	22.01.2010	--do--	--do--
130.	Mr. Gul Shehzad	15.01.1986 Peshawar		21.04.2010	--do--	--do--
131.	Mr. Muhammad Alam (FA)	FR (Lakki)		03.06.2010	--do--	Reverted to his original post of Assistant
132.	Mr. Dildar Khan (BA)	15.05.1975 Abbottabad	01.09.2003	25.06.2010	--do--	Promoted through Administrative order of SMBR,
133.	Mr. Sardar Ghulam Murtaza FA	01.11.1965 Abbottabad	04.06.1988	30.06.2010	Promotee	Naib Tehsildar
134.	Mr. Musadiq Hussain (BA)	27.10.1962 Hanug	15.03.1980	23.07.2010	Naib Tehsildar	Promoted through Administrative order of SMBR,
135.	Mr. Fazle-Rehman (Matric)	10.06.1958 DIKhan		02.09.2010	--do--	--do--
136.	Mr. Haq Nawaz (Matric)	03.07.1960 DIKhan		02.09.2010	Naib Tehsildar	--do--
137.	Mr. Gohar Zaman (FA)	20.04.1965 DIKhan		02.09.2010	--do--	--do--

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138	Mr. Anwar Hussain (FA)	23.03.1972 Kohat		15.10.2010	Promoter	Promoted through Administrative order of SMBR
139	Mr. Ghuncha Gul (C.com)	24.04.1967 Mohmand	22.12.1998	20.11.2010	--do--	--do--
140	Mr. Abdul Jalil (MA)	15.01.1964 SWA		04.11.2010	--do--	--do--
141	Mr. Muhammad Amin (Matric)	19.06.1957 Swat	06.04.1981	08.11.2010	--do--	--do--
142	Mr. Kamilstan (Matric)	01.04.1958 Swat	06.04.1981	08.11.2010	Promotee	--do--
143	Mr. Hazrat Yousaf (MA)	06.04.1959 Battagram	01.01.1977	11.11.2010	--do--	--do--
144	Mr. Faizullah	03.01.1957 Bannu	02.02.1981		--do--	Promoted through Administrative order, Leave to appeal has been filed in Supreme Court against the Tribunal's orders

[Signature]
Secretary - I

[Signature]
Attested



GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT

Peshawar dated the 23/08/2016

Annex
R

4/P

OFFICE ORDER.

No. Estt:V/Final.S.List/Naib Tehsildar/2015/ In pursuance of
Section 8 (i) of the Khyber Pakhtunkhwa, Civil Servant Act, 1973, final seniority list of Naib
Tehsildar in Khyber Pakhtunkhwa as it stood on 31.12.2015 is hereby published for circulation
of all concerned.


By order of
Senior Member

No. Estt:V/Final.S.List/Naib Tehsildar/2015/ 21490-513

Copy of final seniority list is forwarded to

1. All Deputy Commissioners in Khyber Pakhtunkhwa
2. Office Order

They are requested to circulate the same amongst the Naib Tehsildars working under your control for information


Secretary - I

Attested

FINAL SENIORITY LIST OF NAIB TEHSILDAR (BPS - 14) IN KHYBER PAKHTUNKHWA DISTRICT CODE OF 31.12.2015

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S.No.	Name of Naib Tehsildar / Qualification	Date of Birth / Domicile	Date first entry into Government Service	Date of appointment as Naib Tehsildar on regular basis	Method of Recruitment	Remarks
1.	Mr. Abdul Qadeer (MSc)	15.8.1962 DIKhan	28.08.1995	28.08.1995	Promotee	Appointed as Tehsildar (B-16) on ACB
2.	Mr. Muhammad Umar M.A	10.03.1966 Mardan	16.07.2002	17.06.2006	Promotee	Seniority assigned in pursuance of Service Tribunal order
3.	Mr. Farman Ali	04.02.1963 Mardan	16.07.2002	17.06.2006	--do--	Seniority assigned in pursuance of Service Tribunal order dated 15.04.2016
4.	S. Mazhar Hussain Shah (F.A)	07.07.1956 DIKhan	10.05.1976	26.07.2007	Promotee	Naib Tehsildar
5.	Mr. Faizullah	03.01.1957 Bannu	02.02.1981	26.07.2007	--do--	Seniority assigned in pursuance of Service Tribunal order dated 15.04.2016
6.	Mr. Aftab Hussain Shah (B.A)	04.05.1958 DIKhan	13.09.1980	01.01.2008	--do--	Naib Tehsildar
7.	Mr. Saleem Asmat (BA)	03.01.1959 DIKhan	27.03.1984	31.03.2008	--do--	Promoted through Administrative order of SMBR
8.	Mr. Amanullah (Matric)	09.06.1956 Tank	-	29.05.2008	--do--	--do--
9.	Mr. Shah Zaman (F.A)	16.07.1958 Tank	03.07.1984	29.05.2008	--do--	--do--
10.	Mr. Abdur Rashid (Matric)	1958 DIKhan	1987	29.05.2008	--do--	--do--
11.	Muhammad Ayub (Matric)	04.11.1960 Tank	18.12.1986	29.05.2008	--do--	--do--
12.	Mr. Amir Muhammad (B.A)	06.04.1961 Swabi	28.08.1988	11.08.2008	--do--	Naib Tehsildar
13.	Mr. Shakir Ullah (MA. MBA)	15.01.1978 Khyber Agency	02.02.2009	02.02.2009	Direct	--do--
14.	Mr. Munir Ahmad (MSc)	20.03.1979 SWA	02.02.2009	02.02.2009	--do--	--do--
15.	Mr. Rahamd Ullah khan (MSc. Chem)	18.04.1978 Lakki Marwat	02.02.2009	02.02.2009	--do--	--do--

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Attested

16.	Mr. Imtiaz Ali Shah (MSc)	14.04.1980 Karak	02.02.2009	02.02.2009	Direct	Nāib Tehsildar
17.	Mr. Khalid Khan (MA)	23.03.1978 Bajuar	02.02.2009	02.02.2009	--do--	--do--
18.	Mr. Fazli Wadood (BA)	04.04.1982 Mohmand Agency	02.02.2009	02.02.2009	--do--	--do--
19.	Mr. Irshad Ali (MA)	15.03.1978 Mohmand Agency	02.02.2009	02.02.2009	--do--	--do--
20.	Mr. Amir Nawaz (BSc/MBA)	22.04.1975 DIKhan	02.02.2009	02.02.2009	--do--	--do--
21.	Mr. Shah Wazir (MSc)	30.03.1980 SWA	02.02.2009	02.02.2009	--do--	--do--
22.	Mr. Sikandar Khan (M.A)	10.12.1976 Swat	02.02.2009	02.02.2009	--do--	--do--
23.	Mr. Ishtiaq Ahmad (M.A)	30.04.1979 Malakand	02.02.2009	02.02.2009	--do--	--do--
24.	Mr. Shamsul Islam (MA)	10.04.1979 Malakand	02.02.2009	02.02.2009	--do--	--do--
25.	Mr. Allah Noor (MA)	11.04.1983 (FR) DIKhan	02.02.2009	02.02.2009	--do--	--do--
26.	Muhammad Ilyas (MSc)	03.03.1975 Swat	02.02.2009	02.02.2009	--do--	--do--
27.	Mr. Yasir Salman Kundi (MBA)	03.08.1979 Lakki Marwat	02.02.2009	02.02.2009	--do--	--do--
28.	Mr. Yadullah Khattak (MA)	23.05.1979 Mardan	02.02.2009	02.02.2009	--do--	--do--
29.	Mr. Ahmad Hashmi (B.A)	2.04.1983 Dir Lower	02.02.2009	02.02.2009	--do--	--do--
30.	Mr. Amin Ullah Khan (BA)	07.06.1977 DIKhan	02.02.2009	02.02.2009	--do--	--do--
31.	Mr. Zahid Younis (M.A)	20.01.1978 Karak	02.02.2009	02.02.2009	--do--	--do--
32.	Mr. Naimat Ullah (Double M.A)	26.04.1973 Dir	02.02.2009	02.02.2009	--do--	--do--
33.	Muhammad Riaz (LLB)	02.02.1980 Dir Lower	02.02.2009	02.02.2009	--do--	--do--
34.	Muhammad Yar (MA)	02.02.1979 Malakand	02.02.2009	02.02.2009	--do--	--do--
35.	Mr. Sher Ali Khan (M.A)	13.11.1974 Swat	02.02.2009	02.02.2009	--do--	--do--
36.	Mr. Munawar Shah (M.A)	12.02.1973 Dir Lower	02.02.2009	02.02.2009	--do--	--do--
37.	Mr. Iftikhar uddin (MSc)	05.08.1973 Charsadda	02.02.2009	02.02.2009	--do--	--do--

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Attested

38	Mr. Younis Khan (M.A)	15.06.1981 Upper Dir	02.02.2009	02.02.2009	Direct	Naib Tehsildar
39.	Mr. Mujahid Ali (M.A)	19.04.1974 Nowshera	02.02.2009	02.02.2009	--do--	--do--
40.	Syed Abdul Akbar Shah (MSC/M.A)	11.04.1981 Mardan	02.02.2009	02.02.2009	--do--	--do--
41.	Syed Sultan Haider Shah (BA. LLB)	08.12.1972 Peshawar	02.02.2009	02.02.2009	--do--	--do--
42.	Mr. Aftab Ahmad (MSc)	08.12.1982 Peshawar	02.02.2009	02.02.2009	--do--	--do--
43.	Mr. Dil Nawaz Khan (LLB)	22.03.1979 Swabi	02.02.2009	02.02.2009	--do--	--do--
44.	Mr. Kifayat Ullah (M.A)	09.01.1977 Peshawar	02.02.2009	02.02.2009	--do--	Removed from service on 26.5.2014
45.	Mr. Faqir Hussain (BA)	10.10.1983 Nowshera	02.02.2009	02.02.2009	--do--	Naib Tehsildar
46.	Mr. Zulfiqar Khan (M.Com)	15.04.1983 Peshawar	02.02.2009	02.02.2009	--do--	--do--
47.	Mr. Waqar Ahmad (M.A)	24.04.1980 Mansehra	02.02.2009	02.02.2009	--do--	--do--
48.	Muhammad Faraz. Qurashi (MBA)	17.03.1982 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
49.	Mr. Fazal ur Rehman (M.A)	10.07.1975 Haripur	02.02.2009	02.02.2009	--do--	--do--
50.	Mr. Farukh Jadoon (BSc)	04.05.1984 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
51.	Mr. Fayaz Ahmad (M.A)	10.03.1982 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
52.	Mr. Bilal Ahmad (BA. B.Ed)	10.10.1978 Haripur	02.02.2009	02.02.2009	--do--	--do--
53.	Mr. Tanveer Shahzad (M.A)	30.12.1977 Mansehra	02.02.2009	02.02.2009	--do--	--do--
54.	Mr. Ejaz Ahmad (M.A)	15.04.1982 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
55.	Muhammad Salim (BSC)	03.05.1978 Abbottabad	02.02.2009	02.02.2009	--do--	--do--
56.	Mr. Sajid Saleem (MA Political Science)	01.04.1978 Tank	06.11.1996	10.02.2009	Promotee	Promoted through Administrative order of SMBR
57.	Mr. Adil Waseem (BA)	25.12.1988 Nowshera	27.02.2009	27.02.2009	Direct	Dismissed from service on 23.7.2014
58.	Mr. Tanzil-ur-Rehman (BA)	13.02.1988 NWA	14.04.2009	14.04.2009	--do--	Naib Tehsildar

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Attested

59	Mr. Abdul Qayyum (FA)	24.04.1974 Kohistan	27.12.1993	02.05.2009	Promotee	Naib Tehsildar
60	Mr. Roohul Amin (Matric)	25.10.1966 Kohat	01.04.1985	02.05.2009	--do--	--do--
61	Mr. Qianoos Khan (BA)	14.02.1962 Kohat	01.07.1991	02.05.2009	--do--	--do--
62	Mr. Latif-ur-Rehman (Matric)	01.07.1956 Shangla	01.03.1978	02.05.2009	--do--	--do--
63	Mr. Jehan Wali (FA)	01.02.1957 Shangla	01.03.1978	02.05.2009	--do--	--do--
64	Mr. Amir Zarin (Matric)	06.08.1959 Shangla	01.03.1978	02.05.2009	--do--	--do--
65	Mr. Shah Wazir (Matric)	02.02.1960 Swat	05.04.1981	02.05.2009	--do--	--do--
66	Mr. Sher Bahadar (BA)	07.04.1965 Tank	10.10.1992	02.05.2009	--do--	--do--
67	Mr. Shaukat Iqbal (M.A)	2/11/1973 DIKhan	19.10.1992	02.05.2009	--do--	--do--
68	Mr. Abdur Rashid (MSC)	05.01.1962 Swabi	28.08.1988	02.05.2009	--do--	--do--
69	Mr. Ahmad Ali M.A (B.Ed)	17.04.1962 Swabi	28.08.1988	02.05.2009	--do--	--do--
70	Mr. Faramosh Khan (BA)	01.12.1957 Bajaur	26.11.1975	12.05.2009	--do--	Promoted through Administrative order of SMBR,
71	Mr. Abdul Haseeb (Matric)	01.09.1959 Bajaur	18.02.1977	12.05.2009	--do--	--do--
72	Mr. Gohar Ali (B.A)	31.03.1980 Bannu	29.05.2009	29.05.2009	Direct	Naib Tehsildar
73	Mr. Mehmood Shah (Matric)	01.02.1959 Peshawar	04.10.1977	02.06.2009	Promotee	--do--
74	Mr. Sher Dil (BA)	24.01.1974 Kohistan	10.04.1995	02.06.2009	--do--	--do--
75	Muhammad Shoaib (BA)	01.01.1968 Kohat	09.12.1990	02.06.2009	--do--	--do--
76	Muhammad Arshad (BA)	20.01.1967 Kohat	02.09.1984	26.06.2009	--do--	--do--
77	Mr. Zafar Iqbal (B.A. L.L.B)	25.02.1963 Kohat	02.04.1987	02.07.2009	--do--	--do--
78	Mr. Nawab Gul (M.A)	15.11.1966 Kohat	01.01.1995	02.07.2009	--do--	--do--
79	Mr. Umbaras Khan (B.A)	30.06.1960 Mardan	30.08.1988	07.07.2009	--do--	--do--
80	Mr. Shakeel-ul-Rehman	10.02.1978 Bannu	06.01.2009	11.07.2009	Direct	--do--

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81.	Mr. Shiekh Muhammad Jamil (M.A)	15.02.1964 DIKhan	21.10.1992	15.07.2009	Promotee	Naib Tehsildar
82.	Mr. Bashir Ahmad (F.A)	01.01.1957 DIKhan	10.12.1983	18.07.2009	--do--	--do--
83.	Sardar Yousaf (BA)	15.03.1959 Bajaur	22.02.1978	17.09.2009	Promotee	Promoted through Administrative order of SMBR,
84.	Mr. Saz Muhamamd (BA)	01.02.1963 Bajaur	25.11.1981	17.09.2009	--do--	--do--
85.	Mr. Ghulam Sacedullah (FA)	01.01.1957 Bajaur	24.11.1975	18.09.2009	--do--	--do--
86.	Mr. Muhammd Saecd (FA)	Peshawar		30.09.2009	--do--	--do--
87.	Mr. Riaz-ul-Haq (BA)	11.01.1969 Bajaur	04.07.1987	22.10.2009	--do--	--do--
88.	Mr. Jehanzeb Khan (BA)	01.04.1965 Malakand	13.12.1982	08.01.2010	--do--	--do--
89.	Mr. Asmatullah (BA)	25.05.1973 NWA	01.06.1996	22.01.2010	--do--	--do--
90.	Mr. Gul Shehzad	15.01.1986 Peshawar		21.04.2010	--do--	--do--
91.	Mr. Dildar Khan (BA)	15.05.1975 Abbottabad	01.09.2003	25.06.2010	--do--	--do--
92.	Mr. Sardar Ghulam Murtaza FA	01.11.1965 Abbottabad	04.06.1988	30.06.2010	--do--	Promoted through PHC Decision
93.	Syed Musadiq Hussain (MA. Arabic)	27.10.1962 Hanug	15.03.1980	23.07.2010	--do--	Promoted through Administrative order of SMBR,
94.	Mr. Fazle-Rehman (Matric)	10.06.1958 DIKhan		02.09.2010	--do--	--do--
95.	Mr. Haq Nawaz (Matric)	03.07.1960 DIKhan		02.09.2010	--do--	--do--
96.	Mr. Gohar Zaman (FA)	20.04.1965 DIKhan		02.09.2010	--do--	--do--
97.	Mr. Anwar Hussain (FA)	23.03.1972 Kohat		15.10.2010	--do--	--do--
98.	Mr. Ghuncha Gul (C.com)	24.04.1967 Mohmand	22.12.1998	20.11.2010	--do--	--do--
99.	Mr. Abdul Jalil (MA) ✓	15.01.1964 SWA		04.11.2010	--do--	--do--
100.	Mr. Muhammad Amin (Matric)	19.06.1957 Swat	06.04.1981	08.11.2010	--do--	--do--
101.	Mr. Kamailstan (Matric)	01.04.1958 Swat	06.04.1981	08.11.2010	--do--	--do--

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Attested

102.	Mr. Hazrat Yousaf (MA)					
103.	Mr. Haqdad Khan (F.A)	06.04.1959 Battagram 06.02.1956 Bannu	01.01.1977 22.04.1981	11.11.2010 27.05.2015	Promotee	Promoted through Administrative order of SMBR, Naib Tehsildar
104.	Mr. Abdul Salam (FA)	14.11.1981 Lakki Marwat	01.09.2004	27.05.2015	--do--	--do--
105.	Mohammad Khan (FA)	06.02.1980 Mardan	24.04.2008	27.05.2015	--do--	--do--
106.	Mohammad Naeem (BA)	02.02.1961 Abbottabad	15.04.1985	27.05.2015	--do--	--do--
107.	Mr. Jehan Ali (FA)	05.03.1962 Malakand	11.08.1993	27.05.2015	--do--	--do--
108.	Mr. Adam Khan (Matric)	03.06.1956 Dir Lower	01.10.1980	27.05.2015	--do--	--do--
109.	Mr. Bakht Jehan (MA)	15.03.1964 Dir Lower	05.06.1986	27.02.2015	--do--	--do--
110.	Mr. Alamzeb (Matric)	20.04.1959 Dir Lower	01.06.2006	27.05.2015	--do--	--do--
111.	Mr. Nisarullah (Matric)	01.11.1959 Mardan	04.11.1984	27.05.2015	--do--	--do--
112.	Mr. Inayatullah (BA)	27.09.1958 Bannu	12.02.1982	21.08.2015	--do--	--do--
113.	Mr. Rashid Khan (FA)	19.03.1958 Bannu	28.11.1982	21.08.2015	--do--	--do--

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Secretary - I

NOTICE

Annex

48

During Internal Audit of Board of Revenue, it has been observed that you, Mr. Abdul Jalil were Promoted as Naib Tehsildar from Ministerial Staff/Asst. through an administrative order dated 13/10/2010 without holding of Departmental Promotion Committee, which considers the eligibility or otherwise of the official in accordance with the rules.

You are, called upon to appear before the Secretary Revenue and Estate Department/Senior Member, Board of Revenue, and explain as to why the un-lawful order, by which you were un-lawfully promoted, should not be re-considered/withdrawn.

*Jubal
file*

Secretary-I,
Board of Revenue, Khyber Pakhtunkhwa.

Am

*received date on
2/5/2011
G. G. G. G.*

*mp
Attached*

BEFORE SENIOR MEMBER BOARD OF REVENUE,
KHYBER PAKHTUNKHAWA, PESHAWAR

J 49

Annex
M

RE: REPLY TO NOTICE DATED 21.05.2011

Respectfully Sir,

I, Abdul Jalil son of Abdul Haleem Political Naib Tehsildar submits as under:

- 1- That the undersigned was appointed as PTC in Education Department on 18.10.1981 and performed his duties with honesty and to the complete satisfaction of my seniors. It is important to mention that the undersigned was promoted to the CT Post on 15.07.1086.
- 2- That the undersigned performed his duties as CT teacher in the Education Department till 15.05.2006.
- 3- That the post of Assistant ^{office} was advertised by the Office of District Co-ordination Officer, District Tank and the undersigned being qualified for the same duly applied for it.
- 4- That the undersigned was appointed as Assistant (BPS-14) in the ^{office} Office of the Assistant Political Agent Tank vide Order No 2217/Acctt dated 10.05.2006. Resultantly, the undersigned resumed duties as Assistant in the Office of Executive District Officer Finance/Planning Department, District Tank.
- 5- That it is pertinent to mention that after the appointment of the undersigned as ^{office} Assistant in Office of Executive District Officer Finance/Planning Department, District Tank was challenged by one Sana ullah Khan Senior Clerk through an appeal before the

Attested

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(5/10)

Honourable Service Tribunal, Khyber Pakhtunkhawa, Peshawar, but his appeal was dismissed vide order dated 23.10.2007.

True Copy of the Judgment is annexed

- 6- That the undersigned was posted as Office Assistant in the office of Assistant Political Agent, FR Tank. Later on, due to volatile law & order situation in FR Tank, the undersigned was posted Political Naib Tehsildar, Tehsil Jandola in his own pay and scale vide office order dated 22.11.2007 issued by the Additional Chief Secretary (FATA). It is relevant to mention that after discharging duties at Jandola, the undersigned was transferred to South Waziristan Agency, which is one of tough and dangerous region in Pakistan, and the undersigned performed duties as Political Naib Tehsildar in the Region till 26.02.2011. Meanwhile, the Undersigned also appeared and passed the Departmental Examination of Naib Tehsildar held in month of January, 2010.

True Copies of the Order dated 22.11.2007 & Certificate of Departmental Examination are annexed.

- 7- That the undersigned approached the office of the Senior Member Board of Revenue ("SMBR") by filing his Departmental Representation, which was allowed vide order dated 13.10.2010. It is important to mention that the order passed was Judicial Order, and proper arguments were heard and the Department never challenged that Order before any higher authority, hence it has got finality. Furthermore, if the Department failed to constitute the Departmental Selection Committee, it was not the fault of the undersigned and the undersigned should not be penalized for the wrong of the Department.

True Copy of the Order dated 13.10.2010 is annexed.

- 8- That the undersigned is a duly qualified for the post and his appointment is made in accordance with law. Hence, legal rights have

accrued in his favour and propriety, fairness and justice demands that his appointment should not be disturbed. Moreover, the undersigned was holding the post of Political Naib Tehsildar since 26.11.2007 and meanwhile the Provincial Government of Khyber Pakhtunkhawa passed The North West Frontier Province Employees (Regularization of Services) Act, 2009 on 24th October, 2009 which regularized the services of all the employees who were holding the post on 31st December,2008. Hence, on this basis alone the undersigned services are regularized.

True Copies of the academic Record are annexed

- 9- That the undersigned has performed his duties as Political Naib Tehsildar in South Waziristan Agency in most difficult and turbulent times, especially when everybody refused to perform function in this Region after the Kidnapping and brutal murder of two PNTs Amir Nawaz Marwat & Matiullah Burki.
- 10- That the undersigned have discharged his duties to the best of his abilities and with honesty and my senior are fully satisfied with my work and there is not single adverse remark in my ACRs. He is qualified for the post and after performing duties as Political Naib Tehsildar in difficult time and tough region, legal rights have accrued in his favour which can not taken away.

It is, therefore, requested that in view of the above submissions, the services of the undersigned as Political Naib Tehsildar in (BPS-14) should not be disturbed.

Attested

Yours Faithfully

Abdul Jalil
Political Naib Tehsildar
64/6/2011

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT

52

Peshawar Dated 9/09/2016.

Annex
N

ORDER

No. Estt:V/PF/(Abdul Jalil)/ 22704.

Whereas, Mr. Abdul Jalil was promoted to the post of Naib Tehsildar on 13.10.2010 on regular basis through an administrative order without holding of Departmental Promotion Committee meeting.

NOW THEREFORE, in pursuance of order passed by Senior Member, Board of Revenue on 01.09.2016 the promotion / regularization order dated 13.10.2010 being made in violation of Service Rules and instructions governing promotions is hereby withdrawn with immediate effect.

By Order of
Senior Member.

No. Estt:V/PF/(Abdul Jalil)/ 22705-9

Copy forwarded to the:-

1. Commissioner, DIKhan Division.
2. Political Agent, South Waziristan Agency.
3. Deputy Commissioner, Tank.
4. Deputy Secretary (Law & Order), FATA Secretariat, Peshawar.
5. District Accounts Officer, Tank.
6. Official concerned.

[Signature]
Assistant Secretary (Estt)

4
Attested

To

The Honourable Chief Secretary,
The Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.

2016
4/10/2016

S3

CS No-2774
4-10-16

Annex
O

Subject:- Departmental Appeal against the Order Dated 09-09-2016 passed by the
honourable Senior Member Board of Revenue Khyber Pakhtunkhwa.

Respected Sir,

- 1) I have acquired M.A. Pashto Degree and was appointed as PTC in Education Department on 17/10/1981. (Copy of Primary Teacher Certificate and Letter Dated 17/10/1981 are attached)
- 2) That a post of "Assistant" was advertised by the Office of District Co-ordination Office Tank in which I has also applied through proper channel and was appointed as "Assistant" vide Order Dated 10/05/2006. (Copies are attached)
- 3) I was posted as "Niab Tehsildar" at various places including at terrorist activities areas where no other official/officials were ready to perform his/their duties. I along with other colleagues was also posted as "Niab Tehsildar" at different places while various other employees/colleagues of mine have been regularized by the department. I has also submitted an application/appeal for the regularization of my service as "Naib Tehsildar" vide application/appeal Dated 14/07/2010 to the honourable Senior Member Board of Revenue (SMBR) which was accordingly after due process of law has been accepted vide Order Dated 13/10/2010 and consequently Order Dated 04/11/2010 was issued by the honourable Senior Member Board of Revenue (SMBR). (Copy of Appeal, Order dated 13/10/2010, Order dated 04/11/2010 are attached)
- 4) It is also important to mention here that I has also appeared and passed the Departmental Examination of "Naib Tehsildar" in the Year 2010. Since then, Seniority List has also been prepared by the Department. (Copies are attached)

Attested

- 5) The honourable Senior Member Board of Revenue has issued a notice to me against my appointment as "Naib Tehsildar" which was received by me on 21/05/2011. I has submitted written reply to the same but my regularization was withdrawn vide Order Dated 09/09/2016 by the honourable Senior Member Board of Revenue. (Copy of Notice, Reply and Order dated 09/09/2016 are attached)
- 6) I has came to Department for some official work on 30-09-2016 whereby official concerned has verbally handed over the Order Dated 09/09/2016 through which I has came into knowledge about the Order Dated 09/09/2016. (Copy of Order Dated 09/09/2016 is attached)
- 7) Respected sir, the Order Dated 09/09/2016 is incorrect, illegal, without lawful authority, without jurisdiction, void ab intio, hopelessly barred by law, against the well settled principle of law, rules/regulations on the following

GROUNDS:

- a) The Order Dated 09-09-2016 of withdrawal of regularization of the service of Applicant is incorrect, illegal, void ab-initio, without jurisdiction, without lawful authority and worst example of misuse of powers vested under the law and in contravention to the well settled principle of law:
- b) The honourable SMBR was duty bound to act upon in accordance with law and himself violated the rules/regulations of the relevant provision of law and also violated the golden principle of fundamental rights as provided and protected under the Constitution of Islamic Republic of Pakistan, 1973. On this count too, Order Dated 09/09/2016 is liable to be set aside/struck down/withdrawal/cancelled.
- c) The Order Dated 09/09/2016 is result of mala fide, bias, without jurisdiction, without lawful authority and misuse of vested power and without application of judicial mind to the matter.
- d) The honourable Senior Member Board of Revenue was not competent to pass/issue the Order Dated 09/09/2016 against me because the regularization order has been attained finality in the eyes of law and vested rights has been accrued in favour of me. The time barred issue has been opened which is not permitted under the law. No legal foundation of law has been

Attested

mentioned/referred before issuance of notice against me which itself speak the malafide and colorable exercise of his power. The issuance of notice and then Order Dated 09-09-2016 is result of misinterpretation of the Orders Dated 13/10/2010 and 04/11/2010. The honourable Senior Member Board of Revenue was not competent to take cognizance against me and initiation of entire proceedings is without lawful authority, without jurisdiction and based in utter violation of well established principles of law.

- e) The honourable Senior Member Board of Revenue has no legal authority/right to passed the Order Dated 09-09-2016 because the honourable SMBR has become functus officio of the reasons that the honourable SMBR has passed a Judicial Order Dated 13/10/2010 which has not been challenged by any one either department nor other colleagues and has attained finality in the eyes of law. This important legal aspect has not been considered before passing the Order Dated 09-09-2016. As such, the Order Dated 09/09/2016 is liable to struck down.
- f) I possess all the qualifications for the appointment to the post of "Naib Tehsildar" which was never objected by the Department etc and vested rights have been accrued after the expiry of period of limitation. The issuance of Order Dated 09/09/2016 has infringed my legal right and Order Dated 09/09/2016 itself has no legal sanctity in the eyes of law.
- g) I even otherwise is holding the post of Political Naib Tehsildar since 22/11/2007. According to the Khyber Pakhtunkhwa Act XVI of 2009, I was holding the said post according to the time frame given in the ibid Act. I was legally entitled for its regularization and the honourable SMBR has acted in accordance with law by appointing me as Naib Tehsildar vide Order Dated 13/10/2010 and 04/11/2010. Hence, the Order Dated 09/09/2016 is also contrary to the ibid Act too.
- h) That no speaking/judicial Order has been passed by the honourable SMBR while issuing the notice and then Order Dated 09/09/2016. Therefore, the Order Dated 09/09/2016 is liable to be struck down.

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Attested

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It is, humbly requested that on acceptance of instant appeal in hand, the Order Dated 09/09/2016 may very graciously be declared as void ab-initio, without jurisdiction, without lawful authority, misuse of vested power and against the principles of fundamental rights as enshrined in the Constitutional of the Islamic Republic of Pakistan, 1973 as well as relevant statute/rules etc. Consequently, the Order Dated 09-09-2016 may very graciously be set aside/cancelled/withdraw and Order Dated 13/10/2010 and 04/11/2010 may be restored.

Your truly



(Abdul Jalil)
Political Naib Tehsildar,
Barang Bajour Agency

Dated 04/10/2016

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Attested

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EXT-205

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT

No. Estt:V/PF/Abdul Jalil/ 26363

Peshawar dated the 28/10/2016

To

Mr. Abdul Jalil,
Ex- Naib Tehsildar.

Through

Political Agent, Bajuar Agency.

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 09.09.2016
PASSED BY THE HONGUABLE SENIOR MEMBER BOARD OF
REVENUE KHYBER PAKHTUNKHWA.

Reference your appeal dated 04.10.2016 on the subject has been examined
and rejected by the appellate Authority.


Assistant Secretary (Estt.)

Attested

قیمت
10 روپے



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ایڈووکیٹ / دستخط: عبدالرحمن
بار کونسل اباد ایسوسی ایشن، خیبر پختونخواہ
رابطہ نمبر: 0300-5880580

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: خیبر پختونخواہ ایسوسی ایشن ٹرسٹ

منجانب: <u>اس کی کینڈہ</u> <u>عبدالرحمن</u>	دعویٰ: طلبت موضوع: جرم: تھانہ:
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بابت تحریر آنکہ

دستخط
اسٹریٹ
نہالی مورخہ

دستخط
اسٹریٹ
نہالی مورخہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ محمد طارق اہان
 ان مقام ٹاور اور ارشد جمال اور اسد رضا اور محمد شہباز اور محمد شہباز اور محمد شہباز اور محمد شہباز اور محمد شہباز
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقریر نمائندگی و فیصلہ برطاعت دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز ضرورت پر پیروی یا نظر فرما کر یا اپیل کی برآمدگی اور منسوخی نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور ضرورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا بار شمار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب
 مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا نام نہ تو اخذ منظور و قبول ہوگا دوران مقدمہ
 میں جو خرچہ ہر جہان التوائے مقدمہ کے حساب سے ہوگا وہ وکیل موصوف وکیل کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام
 دورہ یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ اپنی پیروی میں مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم:

مقام ٹاور کے لئے منظور ہے۔

نوٹ: ہوس وکالت نامہ کی فراہمی کا قابل قبول ہوگی۔

Accepted
Muhammad