# \*BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1268/2024

Karam Ilahi

Vs

Govt of Khyber Pakhtunkhwa & others

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Respondent

DISTRICT EDUCATION OFFICER

(MALE) CHARSADDA



# BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

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Vs

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### Written comments on behalf of Respondents

### Preliminary Objections:

Respectfully Sheweth:

Khyber Pakhtukhwa
Service Tribunal

Diary No. 17518

- A. That the Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless and not maintainable, it shows no cause to be taken for adjudication, therefore, the Appeal is liable to be rejected/ dismissed.
- C. That the Appeal is unjustifiable, baseless, false, frivolous and vexatious. Hence the same is liable to be dismissed with the order of special compensatory costs in favour of Respondents.
- D. That no legal right of the appellant has been violated, therefore, the appellant has no right to file the instant appeal.
- E. That the Appellant is completely estopped/precluded by his own conduct to file this Appeal.
- G. That the Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from misstatements and concealment of facts and as such the Appellant is not entitled to equitable relief.
- H. That the Appellant has no right to file the instant Appeal and the Hon' able Services Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.
- I. That the instant appeal is barred by law and limitation.

#### **PARA WISE REPLY ON FACTS:**

- 1. That the Para is subject to cogent evidence.
- 2. That though initially the appellant was appointed on 31/05/2014, but the appointment order of the appellant and his colleagues was amended and in this regard a corrigendum was issued. The amended order directed the appellant and many of his colleagues to take their charge from 01/09/2014, because of long summer vacations to save the public exchequer. (Copy of corrigendum order is attached as annexure A)
- 3. That the appellant had been directed in the amended appointment order to take charge of his duties from 01/09/2014, therefore, his service too was regularized from 01/09/2014 and amendment in appointment order is absolutely according to the conditions at serial No 9 in advertisement. That perusal of the appointment order, condition at serial No. 9 clearly shows that the appellant should take charge of his duties after the production of medical/health certificate, meaning thereby, that no one could take charge before producing his health certificate. The appellant health certificate shows, that it was issued on 02/06/2014, then how it is possible that the appellant took charge on 31/05/2014. Moreover the judgment dated 06/11/2023 passed in service appeal No. 7597/2021 is sub silentio on the point of submitting Health and age certificate on 02.6.2014 and, therefore, the instant issue is not similar to that already decided by this Honorable Tribunal. (Copy of health certificate is attached as annexure B)
- 4. That the answering respondent issued a corrigendum order which directed not only the appellant but also all the appointees of the said appointment order i-e total 144 primary school teachers the only cause against that very corrigendum was to save the huge amount of salaries because of three months of long summer vacations. The only purpose of corrigendum was to save the public exchequer of a huge amount of nearly 144 primary teachers' in shape of salary which amounts nearly to RS. 35 Million to 36 Million. Moreover the judgment dated 06/11/2023 passed in service appeal No. 7597/2021 is sub silentio on the point of submitting Health and age certificate on 02.6.2014 and, therefore, the instant issue is not similar to that already decided by this Honorable Tribunal.
- 5. Pertains to record. It is worth mentioning that the pay slip of the appellant shows that the appellant enter into service on dated 01/9/2014 .(Copy of Pay slip is attached as annexure C)
- 6. That the appointment order of the appellant had been amended due to long three months summer vacations which usually start from 1<sup>st</sup> June and terminates on 31<sup>st</sup> august therefore, had been directed to take charge after summer vacations i.e on dated 01/09/2014, hence in the perspective of amended appointment order is not entitled for any kind of relief. It is a famous maxim and judgments of the Hon 'able superior courts that when there is no duty there is no pay. Appellant regularized from 01/9/2014 hence not entitled for any kind of benefits from 31/05/2024.

### **GROUNDS**

- A. That the answering Respondents acted in accordance with law, because the appellant medical certificate shows that it was issued on 02/06/2014, therefore, how can the appellant took charge on 31/05/2014, therefore, the sole ground is enough for dismissal of appeal.
- B. That the Para as stated is incorrect, the answering Respondents are law observing officials and always respected the law and rules.
- C. That Para as stated is incorrect because the term and condition No.9 of the appointment order fulfilled on 02/06/2014, then how the appellant can take charge of his duties on the same day, further the appellant has served less than 180 days on 1<sup>st</sup> December 2014, therefore, is not entitled for annual increment.
- D. Incorrect, the appellant is not entitled for the increments and other benefits, because of the amended appointment order.
- E. That the Para as stated is irrelevant to the present circumstances of the appeal hence, can't be replied, however, as the amended appointment order and the appellant medical certificate clearly indicates that the appellant has not taken over charge on 31/05/2014, hence, is not entitled for any kind of benefits.
- F.G. That the Para has already been replied in the above paras on facts.
  - H. That the Answering Respondents seek permission of this Hon 'able Tribunal to submit other grounds at the time of heaving of the instant appeal.

1. (Samina Altaf)

**L**DURECTOR

AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR

E&SE Department Khyber Pakhtunkhwa Peshawar.

(Muhammad Sheraz)

2. THE DEO (MALE) Charsadda

4

# BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1268/2024

Karam Ilahi

Vś

Govt of Khyber Pakhtunkhwa & others

#### A FIDAVIT

I Mr. Muhammad Sheraz DEO (M) Charsadda do hereby solemnly affirms that the information provided by the DEO (M) and the contents of the Parawise comments submitted by respondents are true and correct and nothing has been concealed intentionally from this Hon' able tribunal. Further stated on oath the answering respondent have neither been placed an ex-parte nor have struck of/cost.

Deponent

(Muhammad Sheraz)
DISTRICT EDUCATION OFFICER

(MALE) CHARSADDA

4/A



## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA









091-9220481

deom.ca@kpese.gov.pk facebook.com/Deomcharsadda

## **AUTHORITY LETTER**

I. Muhammad Sheraz District Education Officer (Male) Charsadda do hereby authorized Mr. Wisal Muhammad Khan Legal Representative on behalf of District Education Officer (Male) Charsadda, to deal with the issues regarding litigation, represent, submit Comments/Reply of the Service Appeals and attend the KPK Honorable Service Tribunal Peshawar.

(Muhammad Sheraz) / DISTRICT EDUCATIN OFFICER

MALE CHARSADDA



## DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR

#### **NOTIFICATION**

I, Samina Altaf, Director Elementary & Secondary Education Department Khyber Peshawar do hereby authorize, Mr. Abdus Sammad, Deputy Director (Legal) Directorate of Elementary & Secondary Education to sign parawise comments, replies, implementation report, objection petitions, civil miscellaneous application etc on my behalf for onward submission before the courts of law/tribunals as the case may be, with immediate effect in the interest of public service.

DIRECTOR

Elementary& Secondary Education Khyber Pakhtunkhwa Peshawar

Endst. No. 26,33-43 /F.No. AD(Lit-II)/E&SED/Office Correspondence/Vol-II/2024 Dated Peshawar the 26/07/2024.

#### Copy of the above is forwarded for information & alaction to the:

- 1. Chief Secretary Khyber Pakhtunkhwa.
- 2. Advocate General Khyber Pakhtunkhwa.
- 3. Secretary Law Department Khyber Pakhtunkhwa.
- 4. Learned Registrar High Court Peshawar (with one each spare copy for the Honorable Judges).
- Learned Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar (with one each spare copy for the Honorable Chairman/Members).
- 6. All Section Officers E&SE Department Khyber Pakhtunkhwa, Peshawar.
- 7. All District Education Officer (Male/Female) Khyber Pakhtunkhwa.
- 8. PS to Secretary E&SE Department Khyber Pakhtunkhwa, Peshawar.
- 9. PA to Additional Secretary (General) E&SE Khyber Pakhtunkhwa, Peshawar,
- 10. PA to Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
- 11. Master File.

DIRECTOR | | Elementary& Secondary Education Klyber Pakhtunkhwa Peshawar

CATS3TIA





# To be substituted with No and Date Appointment Order PST Ad hoc Basis

## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

## **APPOINTMENT**

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of PST School based/UC based in BPS-12 (Rs: 7000-500-22000) @Rs: 7000/= fixed plus usual allowances as admissible under the rules on ad hoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect

#### PST BPS-12

.*	Name	School Name	U/C	Score
<u>.</u>	MUHAMMAD KHALID 17102-6537002-5	GPS Station Killi	Abaşai	
2/	MARJAN ALI 17101-9760071-5	GPS Sheikh Killi	Agra	132.89
3/	MIAN ADIL SHAH 17101-6844013-5	GPS Agra Bala	Agra	121.21
:   بر <b>ه</b>	MUHAMMAD AMIN 17101-9188159-3	GPS Agra Bala	<del></del>	116.33
5,	TILAWAT SHAH 17101-0113694-5	GPS Mandizaj	Agra	114.58
6	MUHAMMAD SHOAIB 17101-0315588-7	GPS Ashra	Battagram	133.59
7/	SHAH ANWAR 17101-0399895-3	<del></del>	Battayram	129.66
8	MUHAMMADASIM	GPS Marozai	Baltagram	154:54
9	17101-7492491-7 SHAH KHALID 17301-4432180-5	GPS Mathra New	Battagram	121.45
10	NASIR KHAN	GPS Mathra Qadeem	Battagram	119.30
<u></u>	17101-0307693-1 MUHAMMAD ISHTIAQ	GPSKhipro Khan Killi	Behiola	135-48
_	17101-3765891-7 YASEEN KHAN	GPS Mian Shakh No.6	Behlola	132-34
2	17101-2716399-9 NIZAM ULLAH	GPS Salar Killi	Behlola	132.18
2	17101-6378689-5	GPS Islam Abad Dargai	Dargai	
4	MUHAMMAD ALI 17101-0300786-9	GPS Nahaqi-1	Daulat Pura	
5/	IKRAM UL HAQ 17101-6170115-7	GPS Ambadher-s	<del> </del>	118.45
16	ASIF ULLAH 17101-0826588-1	GPS Daulat Pura	Daulat Pura	116.29
7/	UMAR GUL 17101-6375764-1		Daulat Pura	114.31
18	ABDURAHMAN 17101-0342715-1	GPS Aziz Abad-2	Dheri Zardad	121.66
19/	DAWOOD MASOOD	GPS Jan Abad	Dheri Zardad	11433
20,	17101-0328797-7 ZAFARALI	GPS Kalyas	Dheri Zardad	104,56
<u></u>	17101-0260821-7 MUHAMMAD GULZAR	GPS Doschra-3	Dosehra	116.17
<u> </u>	17101-2239656-1 SIKANDAR SHAH	GPS Haryuna-2	Dosehra	111.12
22	17101-2156902-9	GPS Check Nissatta	<del> </del>	
23	JAWAD MUHAMMAD 17101-1671324-1	GPS Shuh Dhand	Dozehra	118.55

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## To be substituted with No and Date ` Appointment Order PST Ad hoc Basis



31	KHIZAR HAYAT 17102-7968271-1	GPS Gandheri Payan No.1	Gandheri	137.0
25	MUHAMMAD PERVEZ 17102-6620616-9	GPS Gandheri Bala	Gandherl	133.58
26	ZAIIID MUILAMMAD 17102-9586608-9	GPS Gandheri Payan No.2	Gandherl	128.93
27	SHAKERI, AHAIAD 17102-747UUSI-9	GPS Karimo Handa	Gandherl	123.06
28	WAQAR KIIAN 17101-5363178-3	GPS Malka Dher	Ghuifia Karkana	116.56
20	KANIKAN ULLATI 17101-0319290-9	GPS Malka Dhar	Ghunda Karkana	115.09
30	SIANIS UL IIAQ 17101-1857398-9	GPS Baz Mian Killi	Ghunda Karkana	105.70
31	REIIMANULIAH 17103-0354096-1	GPS Ocha Wala-s	Haji Zal	122.25
32	ALI GAUHAR 17103-0371185-7	GPS Mahmood Abad	Haji Zai	117.8
33	ANIVAR ZEB 17102-3704269-7	GPS Inzar Killi	Harickand	124-53
34	JAIVAD ALI 17101-1922862-5	CPS Khubal	Hossan Zal	128.94
35	NIUIANINIAD IZILAR // 17101-3845983-7	GPS Hassan Zai	Hassan Zai	123.63
36	NASEENI KILAN 17101-0395047-3	GPS Sokhta-s	Haman Zal	121.11
ع <sub>ر</sub> رو	AUNITAD KITAN 17101-8362252-7	GPS Kotak	Hussun Zal	115-33
дŘ	MEHROZ KIIAN 17102-0517988-3	GPS Gal Abod Yangi	History Nehel	143-57
39	ASAD ALI 17102-2121297-9	GPS Gul Abad Tangl	Hisara Nehrl	135:77
40	SIIAIIID KIIAN 17102-2870858-1	GPS AIS Gul Qilla	Hisura Nehrl	129-44
41	SHER ALI 17161-8836640-3	GPS Kangra	Kangra	131.62
48	NOOR ULIAII JAN 17:01-0167274-9	GPS Ghurambak	Kungra	124.02
43	FATHUL ANIN 17101-9343851-3	GPS D.Sikandar Khan	Kanyra	116.34
44	SIIAD MUIIAMMAD 17101-7588487-3	GPS Haryana	Kungra	115.98
45	NAEENI JAN 17101-9764384-5	GPS Huryana	Kangra	. 112:19
46	ADDUR RAFI JAN 17101-6321182-5	GPS Sadar Garki-3	Katozał	9935
47	SYED ZAHEER ABBAS 17101-0960254-5	GPS Spinkai-1	Katozal	96.43
48	BAKIIT TAJ GUL 17101-2528410-5	GPS Dheral Kor	Kalozal	12251
49	ZIA RAFIQ 17101-0377826-3	GPS Katozul-t	Katozni	120.86
50	NIUILANINIAD AWAIS 17101-4#7547#-1	GPS Katozal-2	Kutozai	113.52
51	SHER BAZ KHAN 17101-9168708-7	GPS Spinkal-2	. Katozai	105.58
52	ZULFIQAR ALI 17101-0310390-9	GMPS Champana	Khan Mahl	128.51
SĘ	RIAZ AIIAIAD 17102-9703868-5	GPS Landi Rond	Koz Behram Dheri	132/19



## To be substituted with No and Date Appointment Order PST Ad hoc Basis

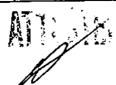
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5	ANIROOZ KIIAN 17102-2651249-1	GPS Landi Roud	Koz Behrum Dheri	122.07
3.	17102-7714899-5	GPS Arat RIIII	Kuz Behram Dheri	119.64
s	MUKITAR ULLAH 17102-1163877-1	GPS Islamabad Deobaudi	Kuz Behrum Dheri	119.22
67	NAZIR AHAIAD 17102-6036836-7	GPS Mardhand No.1	Kuz Behram Dheri	112-46
88	1175ALAHAIAD 17103-0348097-5	GPS M. Rustain Khal	M.M Khal	131.51
59	ABDUS SALANI 17301-3407039-1	GPS Mutta Muyhal Khel	NI.NI Khel	124.18
60	SAEED KIIAN 17101-7276529-5	GPS Matta Maghal Khel	M.M Khel	114.32
6,	WISALAHMAD 17101-4418397-3	GPS Hasson Gul Kor	MAI Khel	106.07
62	RAHAM SHID KHAN 17101-9461238-9	GPS Krapa Muhammad Khan	M.Ni Khel	105.96
63	SYED ZIAUDDIN BADSIIAII 17101-0275214-9	GPS Duryab Kor	MM Khel	104.98
64	YASIR KIIAN 17102-2872837-3	GPS Mandani	Mandani	11251
65	NUHAMMAD TAYYEU 17102-7302181-1	• GPS Tangl No.1		133-24
66	MUHAMMAD ISMAIL SHAJID 17102-0407188-7	GPS Tangi No.J	* AIC Tangl	123.96
67	MUHAMMAD DAWOOD KHAN 17102-7433487-7	CPS Tangl No.s	MCTangi	118.34
GB	KHALIL ULLAH 17101-0401414-5	GPS Utmanzal-3	MC Ulmanzai	124.07
69	ROOH UL ANIN 17101-0365780-5	GPS Dag Shamozal	AIC Unnansal	usai
70	FARIAD ALI 17101-3658119-9	GPS Katigon	NC Vimanzai	108.25
74	MUHAMMAD YAR 17101-0310807-3	GPS Charmaddo-3	MC-s Charsadda	130.01
72.	NIUIIAMNIAD ADIL JAN . 17101-9006856-5	GPS Bosa Khel-2	MC-1 Chareadda	104.12
73	MOAZAM JAN 17101-8006111-9	GPS Qazi Khel-2	MC-s Charsadda	122.53
74	DAKIIT AIUNIR 17101-0397973-1	GPS Sadiq Abad	MC-i Shabqadar	126.57
75	IRFAN ULIAII 17301-4722563-9	GPS Rahmatullah Khan Kor	MC-1 Shabqadar	118.4
76	MAJID SHAH 17101-8067215-1	GPS Rahmatuliah Khan Kor	MC-s Shabqadar	109.49
77	INANI UL IIASSAN 17101-1254810-1	GPS Tambulak	MC-2 Chursadda	121.71
78	MUHAMMIAD ZEESHAN 17101-9729175-5	GPS Khat Killi	MC-2 Charsadda	115.17
79	RASOOL \$11A11 17101-4723173-3	GPS Prang-1	NIC-2 Charsadda	114.8
80	ASFANDIYAR 17101-3975974-3	GPS Promp-3	MC-2 Charsadda	109,01
8;	ZAFAR KILAN 17101-7165544-7	GPS Shabqadar Fort-2	NIC-s Shabqadar	99.7
7.0	DILA\VAR SHAH 17101-4419772-5	CAIPS Bubra	MC-3 Chd	114.04
83	TARIQ JAN 17101-1602078-9	GPS Attakl-3	MC-j Shabqadar	96.94
84	111SAN ALI 17103-0368397-7	GPS Attaki-3	· MC-3 Shabqadar	94-47
		<del></del>		



## To be substituted with No and Date. Appointment Order PST Ad hoc Basis

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	85 ADNAN HUSSAIN 17301-0919488-7	GPS Gonda	MC-3 Shabqadar	112.0
	H6 NOIHH ULLAH 17101-0108796-9	GPS Attaki-2	MC-3 Shabqadar	100.96
· [	SAYYED MASOOD AHMAD / 17101-2505470-1	GF\$ Attaki-2	MC-3 Shabqadar	100.86
	M NIAZ, A1,1 171010-1192-1000-13	GPS Arroki g	810° g Shabiqudar	fens. 11-
8	9 USMANALI 17101-512237J-1	GPS Asmat Abad	MC√4 Charsadda	116.6
9	UIISAN ULIAH ALIAS ASAD 17101-0308575-3	GPS Omar Abad	MC-4 Charmadda	115.34
9	NUSRATALI 17101-0251339-3	GPS IslamAbad-2	MC-4 Charsadda	101.79
, y	WAJIII ULLATI 17101-0413010-5	GPS Fugir Abad	Meru Prany	143-47
93	FAZAI, AMIN 17101-0958822-3	GPS Sheikh Munaf killi	Alera Umarzai	195.38
94	NUITAMMAD IMRAN 17101-9521339-3	GPS Ewaz Killi	Mera Umarzai	124.57
95	ALAMZED KILAN 17101-3836322-3	GPS Nawab Khan Koro	Ålera Umarzai	117.94
96	ASIF SHAII 17101-2062079-9	GPS Shalmano Killi	Alera Umarzol	116.10
97	SILAHIDALI 1710#-9561338-5	GFS Dildar Gurld	Mirsa Dher	120.48
98	ISIITIAQ AIIMAD 17102-5847695-7	GPS Mian Sahib Gorhi	Mirza Dher	113.93
99	YASIR KILAN 17101-0203548-5	GPS Inom Killi	Muhammad Nari	125.6
100	QAISAR ALI 17101-7317747-3	GPS Muhammad Nari	Muhammad Nari	<b>118.45</b>
101	SIIAJIID KIIAN 21407-5793986-5	GPS Shah Afzal Abad	Muhammad Nari	118.25
102	WAJID ULLAII 17101-0357508-5	GPS Ghandail Khan Kor	Nissatta	132.78
103	SHEHER GILAYAS KILAN 17101-7071293-J	GPS Purao-s	Nissatta	130.3
104	NIAMAT ULLAJI 17101-2435986-3	CPS Mian Isa	Panipao	141.53
105	KOKIIAN ALI 17101-9080500-9	GPS Daluzuk	Pardpao	133-56
106	ZUBAIR KILAN 17103-0342333-9	GPS Shahbas Khan Kor	Panjpao	125-45
107	NIRZĄ ALI KIIAN 17103-0340645-5	GPS Pir Qillu No.1	Puijpao	 129.G6
108	SILAII NIUILANINIAD 21407-4147405-J	GPS Yarjan Killi	Panjpao	114.36
109	AKIITER ALI 17101-0257749-1	GPS Angur Kor	Rajjar-s	144.92
(m)	ABDUL MUSAWIR 17101-3401857-5	GPS Angar Kor	Rajjar-s	132.1
111	OWAIŞ ULLAII 17101-7120368-1	GPS Sulai Kamar	Rajjor-1	11243
113	SILAJI AYAZ UDDIN 17101-0271844-3	GPS Raijar-1	Raijar-1	102.35
113	TAJIIR ALI SIIAJI 17101-8707068-5	GPS Shakor Dhand .	Raijar-s	118.74
314	ATTA ULLAH JAN 17101-0983778-5	GPS.Rahima '	Rajjar-2	117.28
115	#IANZOOR ALI 17101-1819839-7	GPS Gujrano Killi	Rajjar-2	109.71
		<del></del>		



# To be substituted with No and Date Appointment Order PST Ad hoc Basis

		omiment of not 101714 and		
-	6 NUHAMMAD HASIK 17101-1420852-7	GPS Wardayu-1	Knijar-2	107.59
	SADEEQ ULLAII 17101-6320758-7	GPS Kodal-2	Rashakal	96.2
	AIUSTAFA ZER	GPS Rozhakul	Rashakal `	93-93
1,,,	AUDULLAII KIIAN 17101-6417238-9	GPS Zrawar Khon Kor	Rashnkal	87.29
120	CHI. BAJ KHAN	GPS Handa Rashukui	Hashakal	118.53
121	ZAKIR ULLAII 21407-5670864-5	GPS Banda Rashakal	Rashakat	417.43
122	**************************************	GPS Chundal Kor	Kashakal	114.17
(27	KHAN BIUUANINIAD 1700-1059/34-3	GPS Nijan Killi +	Roshakal	107.21
124	KARAN ILAIII 17101-0321468-5	GPS Ajoan Killi	Surki Tilara	127.52
125	ISITIYAQ AIIAIAD 17101-2752491-3	GMPS Hayat Gul Kor	Sarki Titara	124.92
126	FANVAD AIINIAD 17101-0303540-3	GPS Jaial Killi-9	Sarki Titara	118.25
127	IRSHAD ALI 17101-0993454-5	GPS Anwar Killi-1	Sarki Titara	120.41
128	2AIN III. ARIDEEN 17101-4689553-3-	GPS Sark i Titora-ı	Sarki Mara	112.05
129	JANIIL NIUILANINIAD KILAN 17101-0377280-9	GPS Haqdar Qalarai	Sarki Titu <b>ra</b>	111.20
130	MUSTAFA 17108-9575090-9	GPS Chail	Shodag	134.38
ıyı .	HAROON KHAN 17101-3800476-1	GPS D. Ghulam Qadir	Tarnab	130.34
دوز	SHAHAH ALI 17101-0874659- <b>3</b>	GPS D. Mukarram Khan	Tarnab	7.0.1.
133	NIUDASSIR SIIAII 17101-3398831-9	GMPS Tankhazai	Turunyzai	126.55
134	WAQAR ALI SHAH 17101-7624422-5	GPS Anwar Mahal-2	Turangzal	121.33
135	- <b>EON UELAH</b> 17101-7128195-1	GPS Anwar Mahal-2	Turangzal	112.97
136	MUHAMMAD YASIR 17101-8371336-5	GPS Eidyah	Umarzai	121.89
137	WASIQ JAN 17101-6328961-3	GPS Umarzai-2	Umorxal	118.65
138	NAEEM JAN 17101-0332021-1	GPS Yakh Kohi	Uniarzai	115.59
370 I	ATTAULLAII NOOR 17101-5067018-7	GPS Zahoor Abad	. Umarzal	113.3
140 1	AFTAB AIINIAD 17101-9526663-5	GPS Chitla Dheral	Umarzai	109.25
	SABER SILAII 17102-8126097-7	GPS Zuhrab Gul	Ziam	130.56
	MUIAMMAD TUFAIL 17102-6314292-7	GPS Hamaish Gul Killi	Zlam	129.4
14T 1	ROSILAN KILAN 17102-4224859-5	GPS All Jon Killl	Zianı	122.65
	YOUSAF KIIAN 17102-9866008-5	GPS Hisara Miuna	Zlum	118.35

M)

### To be substituted with No and Date Appointment Order PST Ad hoc Basis



## FERMS & CONDITIONS.

- NO TA/DA cic is allowed.
- 2. Charge reports should be submitted to all concerned in duplicate.
- 3. Appointment is purely on temporary & contract basis initially for one year.
- 4. They should not be hunded over charge if they exceed 35 years or below 18 years of age.
- 5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned). Anyone found producing boyus . Certificate will be reported to the law enforcing agencies for further action.
- 6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
- 7. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified
- 8. He should join his post within to days of the issuance of this notification. In case of failure to join their post within to days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained...
- Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
- He will be governed by such rules and regulations as may be issued from time to time by the 11. Capt.
- His services shall be terminated at any time, in case his performance is found 12. unsatisfactory during his contract period. In case of misconduct, he shall be preceded under the rules framed from time to time.
- His appointment is made on School based, He will have to serve at the place of posting, 13. and his service is not transferable to any other station.
- Before handing over charge once again their document may be checked if they have not 14. the required qualification, they may not be handed over charge.

(Siraj Muhammad) District Education Officer (Male) Charsadda

Endst: No:4807-4958/Dated: Charsadda the 31/05/2014

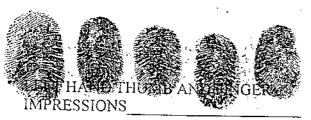
Copy forwarded for information and necessary action to the: •

- 1. Director E&SE Deptt: Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Commissioner Charsadda
- 3. District Accounts Officer Charsadda
- 4. SDEO (M) Charsadda 5. SDEO (M) Tangi
- 6. Official Concerned
- 7. M/File

District Education Officer · (Male) Charsadda

MEDICAL	CERTIFIC	CATE

Name of Official Karam Slahi
Caste or race At though.
Father's Name Parli Rabi
Residence Muliano le eli Muira Turngzai
Tehsil and District charlada.
Date of birth 24.04.1989,
Exact height by measurement 5/-6
Personal mark of identification (2/0/-032/468.5.
Signature of the Official
Signature of head of office
Seal of Office
I do hereby certify that I have examined Mr Kowam Dlahe
a candidate for employment in the office of the Education dopting
and can not discover that he had any disease communicable
and can not discover that he had any disease communicable or other constitutional
affection or bodily infirmity except ////
I do not consider this as disqualification for employment in the office of the
His age according to his own statement is
years and by appearance about Me Said.



Medical Superintendent (63) Superintendent (63



The Holly

(12) 0

الد الخصول و مجتذری ایم کمن خلع چارسده کے اور اتکنام مرداند سکواں میں متدمید اول کیڈوندک خال آساسے ں پر انج پاک سکول وسل Adhoe School) ( 1900 کور وں کے خطع چارسده کے سکوان فی اصدائدی سے کوارہ فادم پر مورور 20 جوری کا 201 دیکے مدفواتش منظر ب ہیں۔ رواست ہرم این ل ایمی NTS کی دھیا ساتھ (Chilp://www.nis.org.plu) کے دھیا ہے ۔ چادر سے کریکس اور مترم تاریخ کور نے کے بعد موسول اردان مار موری کا مانک ۔

•		41-40 7 6100	ハウッム
مركاحد	، تعلى البيت ،	4441	كبراه
	الااے، بالی کا إسادی المبعد کی کو للم شد، بے اور فی سے بعدی ل سرفیکید یا سالدالیوی ایت داگری	ป๋ัง	1
De221 10	الناجية ي كان ميم مداع يوري سي 18 ( المرد ) ١٠١١ في ران الكريش	BPS.15	
	لااسة لدائم ال كالمح تشكيم شده وغد تف بمعاكد سالداد وانك امر كولى معلى	נטוא	1
35118سال		BPS-15	
	لااے لاالی کا اصادل لالیت کی کی تشکیرٹ دوندی میں ماہ مادل لالیت کی کی تشکیرٹ دوندی میں ماد مادل لالیت کی کی تشکیرٹ دوندی میں میں استفادہ کی استفادہ کی تعدید کے تعدید کی تعدید کند کرد	ં નુંવાન	3
35 \$ 18 كال	لبائے لبائس ک إساد ل الب كى كى كتاب شده بي يورش سے بعدا يك مال جونير ولي مان نفر عل الم يكشن كري الم يكشن المركائية الله المركائية المر	BPS-15	
	اليم الحم كا (ميكنول وان ) كم بير بشليرو و المسلم ا	اسكل	⁴
ال 35F20	ائیں الیمن ک ( میکندا ویون ) کی کی تشکیم شدہ ہورا ہے جسد شہاد ؟ العاليہ فی المحلوم العرب الماسلام کی متند بخشیر ہو الوقاتی الدواری یا داد معلوم سیدو شریف سواست وار العلوم جار ہالی اسواست وارا معلوم چر ال دار العلوم دور تی چرال یا کمی کی تشکیم شدہ بی نحد دئی سے حمل کی پیکند کھار مامز الحری	BPS-15	
** 1	المحري كتابيم شده بوغورش سورا مريي برير المجران موات فالمحلوم جرال فالمحلوم بدون جرال والمالح		<u> </u>
	اليم الحري (مكنول رمن المربم خلا	لٰلُ	5
k.35F20	ایس الیس ک (سیکند دوین می می می سیان الیس الیس الیس الیس الیس الیس الیس ک منظور شده منظم الوفاق الداری یا دارال الیس الیس الیس می می الیس الیس الیس الیس الیس الیس الیس الی	BPS-15	1
ولا عاد وحال	دار المعلم مسيد و ترنيف سوات وارسلوم جار باخ سوات وارالعلوم حجر ال دا العلم منظور شده عليم الوفاق العدادي با اسلام است مح می تسلیم شده می ندر تن سوات وارالعلوم حجر ال دا العلوم دوش حجر ال با سینفر و در ن ایم ایس	·	
	= U12(12) - U - 3	تاري	6
	اعرمیدیت بمدون التران ادرسوترات کی کی اعورشد والدر ا	BPS-12	
JU35118	·	بأركارا	7
	متريد المالكم عليد كالكليمندالداك بعد الركام ل تريي الله ورك	BPS-12	
35t 18 مال	ا تومیده ید إسادی مربیکید کی کتلیم شد، بردات بعد به اگر که کمول تی رمیکید الله و سان ایجیش، کی مستعدادار ، ایم ایمی ایمی تا در بان ایجیش، کی استعدادار ، ایمی ایمی ایمی ایمی کاری ان ایمی می منظور شد، بردا سه و مال ایسوی اید و گری ان ایمی می کتابی می کتابیم شده و تورش ب		
į	ایج کیش می می حلیم شده و تعدی به داوج ن) کا می حظور شد ، پروڈ سے بعد 2 سال ایسوی ایٹ ذکری ان ایج کیش می می حلیم شده و تعدی ہے۔ ایک (Selection Criticia)	سن کرو ق	سلعكة
i	(Scleation Criteria) :	بالاسي	

اماتذه كم مشيش كرين الارتازيل بي كر 2000 فبرات كي تسبه مي طروات ك جالكي . استخد م كم من الارتازيل بي الحرود المعروب المستمال المروات كي جالكي .

هلرون و روا	100 = 5 13 27 2
ب- فلي قالميت = 100 فمرض كام يلتيم بس طرن بوك	تعليمي قابليت
	الرايري
مال كرده فبر 20x تعمير كل فبر	الإسار الإسالين كل
مال كرده بر 20x ميم ل بر	س المالياء الله
مال كرد فرير 10x منيركو فر	المائدالمالي المائدالمالي
مامل كده بر 15x ميري فر	100-1-12-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1
15x7.100	مراً سال كميل مطلوب چشده داندة جيد
ما كركد البريم المبري ا	1 10 M 11 M M 1
مال كرد برارة و ميرك ز	ाउँ एक का कि क कि का कि

ال ۱۱ ما جادن مريا- يماما سيده و ودور من مريات من من المراحي مستقل كونت المن المراج المنظر المن المنظم المراح المنظم الم م تین ول کامیدادوں کور م ول یا باتا ۔ (2) قام تقرریاں خاصتا مارش بنیادوں با Adhoc اور کٹریکٹ پرایک سال سے سے می دوران کا میدادوں کا م جول كامورف على كو كر Age Relaxation في الإداع كروت الله المراع كروت الله المراساد بمدامل الناني كاروزاد وزال عد مرب كروسار المن شاقى كارلان بوكار (5) يرب به آن والے اميد وارون كا مناوت اور سے تعد بن كرال جائي كى جس كرنام افراء ت اميد ور روز من كرنا بوت -(6) الروي ك في آف دا له اميددادول كول T.VDA فيمن و باستار (7) مرف مرودوت كايدمومول موغدالد دخواس و في الدوي و عام -(3) دم وينكى كوا تعياد مامن سيد كيده وكل اجتلاع بنيم ك كاوت كل الروا تروي منورة كروب - (9) كراس المتارك بوطورت ون كرف سيمرن كرية كارهمة و لى كالوسكيش كين اس كرسال المراح كي إندادك - (10) كل المحمر كاديك دري المريش كالقيار عامل الم كار والمان ما مين والمراح من المراح المر اميدداد محرل كريد (11) الم تقرر إلى مكومت فير يخونو المسترركرد، قوائين ، كول المريق كارك خالاتا مرث كي بنياد بر موكار (12) و مشي سد در ز محروست كالميم شده اوارون كى قاعلى تول مول كى -(13) اكركى اميدوارك استاد على ياع كور اس كاناف قانون باره جرى كى بات كى امرة تحداث ا مركادى الماؤست كے دافي تسور كيا جائے كا- (14) : كمل قارم إسل ال كامورت عى درفواست قارم فود بلور سون تسور كيا جائے كرك الل معور جمل كا جاع كا -(15) اعروي ك في الك شيرول جارى كيا جاعة ع -(16) تا مترر إلى معلد امتا ع كادرياك كا بناو ربدك ماكران فن عرام دار دوياب د مول ترج المل كاميدوار عديرث كا بناو يرترون ل كام كي كار (١٦) اميدار كان عمر ال عدروي كرن موك يوك والما مال الما المال عدد والما كالماليدار بك الميدار بكار بك الميدار 5 مکولوں عمل خالی آ مامیوں کے لئے دوخواست دے ملک ہے۔ (19) دوخواست دینے کا طریقہ کا مریک کا دیسرمائٹ م موجود ہے۔ (20) متعلقہ خالی آ مامیوں ک تعلیل مکول واکن در فواست معزم سے ساتھ NTS عبد سائد پردی کی بین اور بر مکول کوافک وار دیا ہے۔ اكداشت ميد كل الني من المرك مع الراسد و كالمرك من المرك من كم كي كي ويد الي المناه من المرك م

A SPI

#### Dist. Govt. KP-Provincial District Accounts Office Charsadda Monthly Salary Statement (January-2024)





### Personal Information of Mr KARAM ILAHI d/w/s of FAZA L RABI

Personnel Number: 00728242

CNIC: 1710103214685

Date of Birth: 24.04.1989

Entry into Govt. Service: 01.09.2014

NTN:

Length of Service: 09 Years 05 Months 001 Days

**Employment Category: Active Temporary** 

Designation: SENIOR PRIMARY SCHOOL TEA

80001042-DISTRICT GOVERNMENT KHYBE

DDO Code: CA6012-DEPUTY DISTRICT OFFICER (MALE) PRIM EDUCATION CHARSADDA (REGULAR)

Payroll Section: 001

GPF Section: 001

**GPF** Interest applied

Cash Center: 02

162,813.00 (provisional)

GPF A/C No: Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 14

**GPF Balance:** 

Pay Stage: 8

	Wage type	Amount	Wage type	Amount
0001 Basic Pay	<u>/</u>	36,450.00	1001 House Rent Allowance 45%	3,321.00
1210 Convey A	Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2148 15% Adh	oc Relief All-2013	350.00	2199 Adhoc Relief Allow @10%	226.00
2316 Teaching	Allowance 2021	3,036.00	2341 Dispr. Red All 15% 2022KP	3,330.00
2347 Adhoc Re	el Al 15% 22(PS17)	3,330.00	2378 Adhoc Relief All 2023 35%	12,148.00

#### **Deductions - General**

Wage type		Amount	Wage type		Amount
3014	GPF Subscription	-3,900.00	3501 Benevolent		-1,200,00
3609	Income Tax	-310.00	3990 Emp.Edu. I		-135.00
4004	R. Benefits & Death Comp:	-600.00			0.00

#### **Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	215,000.00	-5,972.00	191.112.00

Deductions - Income Tax

Payable:

4.746.64

Recovered till JAN-2024:

2,010.00

Exempted: 1186.69

Recoverable:

1,549.95

Gross Pay (Rs.):

66,547.00

Deductions: (Rs.):

-12,117.00

Net Pay: (Rs.):

54,430.00

Payee Name: KARAM ILAHI

Account Number: 18577900053903

Bank Details: HABIB BANK LIMITED, 221857 UMERZAI CHARSADA UMERZAI BRANCH, CHARSADA

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address:

City: TR

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: k.ilahi99@gmail.com