BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1278/2024

Ikram Ul Haq

 V_{S}

Govt of Khyber Pakhtunkhwa& others

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Respondent

DISTRICT EDUCATION/OFFICER

(MALE) CHARSADDA



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1278/2024

Ikram Ul Haq

Vs

Govt of Khyber Pakhtunkhwa& others

Written comments on behalf of Respondents

Preliminary Objections:

Respectfully Sheweth:

- 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.

Khyber Pakhtukhwa Service Welling

Diary No. 17536

Dated_ 6/-11-24



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 1st June and terminates on 31st 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 I-lon '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
- han 180 days on 1st 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) DIRECTOR

AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR

E&SE Department Khyber Pakhtunkhwa Peshawar.

(Muhammad Sheraz)

2. THE DEO (MALE) Charsadda



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1278/2024

Ikram Ul Haq

Vs

Govt of Khyber Pakhtunkhwa& others

<u>A FIDAVIT</u>

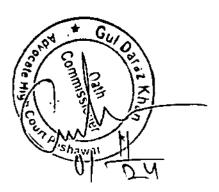
I Mr. Muhammad Sheraz DEO (M) Charsadda do hereby solemnly affirms that the information provided by the DEO (M) and the contents of the Parawise comments submitted by respondents are true and correct and nothing has been concealed intentionally from this Hon' able tribunal. Further stated on oath the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

Deponent

(Muhammad Sheraz

DISTRICT EDUCATION OFFICER

(MALE) CHARSAD Q





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. 2633-43 /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:

- 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.

Elementary& Secondary Education Khyber Pakhtunkhwa Peshawar

ATTESTED





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 from 01-09-2014.

PST BPS-12

	Name	School Name	U/C	Score
1/	MUHAMMAD KHALID 17102-6537002-5	GPS Station Killi	Abazai	
2/	MARJAN ALI 17101-9766071-5	GPS Sheikh Killi	Agra	132.89
3/	MIAN ADIL SHAH 17101-6844013-5	GPS Agra Bala	 	121.21
4,	MUHAMMAD AMIN 17101-9188159-3	GPS Agra Balu	Agra	116.33
5,	TILAWAT SHAH 17101-0113694-5	GPS Mandizai	Agra	114.58
6/	MUHAMMAD SHOAIB 17101-0315588-7	GPS Ashra	Battegram	133.59
2/	SHAH ANWAR 17101-0399895-3	GPS Marozai	Battagram	129.66
8	MUHAMMAD ASIM 17101-7492491-7	GPS Mathra New	Battagram	124.24
9,	SHAH KHALID 17301-4432180-5		Battagram	12145
10	NASIR KHAN	GPS Mathra Qadeem	Battagram	119.30
<u></u>	17101-0307693-1 MUHAMMAD ISHTIAQ	GPSKhisro Khan Killi	Behlola	135-48
	17101-3765891-7 YASEEN KHAN	GPS Mian Shakh No.6	Behlola	132.34
12/	17101-2716399-9 NIZAM ULLAH	GPS Salar Killi	Behlola	132.18
13/	17101-6378689-5	GPS Islam Abad Dargai	Dargai	
14	MUHAMMAD ALI 17101-0300786-9	GPS Nahaqi-1	Daulat Pura	135.83
15/	IKRAM UL HAQ 17101-6170115-7	GPS Ambadher-1	Daulat Pura	118.45
16,	ASIF ULLAH 17101-0826588-1	GPS Daulat Puro	 	116,29
17/	UMAR GUL 17101-6375764-1	GPS Aziz Abad-2	Daulat Pura	11431
18	ABDURAHMAN 17101-0348715-1	GPS Jan Abad	Dheri Zardad	121.66
19/	DAWOOD MASOOD 17101-0328797-7		Dheri Zardad	114:33
20/	ZAFAR ALI 17101-0260821-7	GPS Kalyas	Dheri Zardad	104.56
21,	MUHAMMAD GULZAR 17101-2239656-1	GPS Dosehra-3	Doschra	116.17
22	SIKANDAR SHAH 17101-2156902-9	GPS Haryana-2	Dusehra	111.12
23	JAWAD MUHAMMAD	GPS Check Nissatta	Dosehra	118.55
	17101-1671324-1	GPS Shoh Dhand	Dosehra	117.17

ATTESTED

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

				^
3 1	KIHZAR HAYAT 17102-7968271-1	GPS Gundheri Payan No.1	Gandheri	137.0
25	AUUHAMMAD PERVEZ 17102-6620616-9	GPS Gundheri Vala	Gandherl	133 48
26	ZAIIID MUHAMMAD 17102-9586608-9	GPS Gandheri Payan No.2	Candherl	128.93
27	SHAKEEL AHAIAD 17102-7470651-9	GPS Karimo Handa	Gundharl	123.06
gB	WAQAR KIIAN 17101-5363178-3	GPS Malka Dher	Ghuilla Karkana	116.56
19	KANIKAN ULLATI 17101-0319290-9	GPS Malka Dher	Ghunda Karkana	115.09
30	SILAMS UL HAQ 17101-1857398-9	GPS Baz Mion Killi	Ghunda Karkana	105.70 V
31	REIIMANULLAH 17103-0354096-1	GPS Ocha Wala-s	Ilaji Zal	122.25
32	ALI GAUHAR 17103-0371185-7	.OPS Mahmood Abad	Haji Zal	117.8
ນ	AMWAR ZEB 17102-3704269-7	GPS Inzar Killi	Harichand	124-52
34	JAIVAD ALI 17101-1922862-5	GPS Khubal	Hassan Zal	128.94
35	MUHAMMAD IZHAR / 17101-3845983-7	GPS Hassan Zai	Hassan Zal	123.63
36	NASEEAI KILAN 17101-0395647-3	GPS Sokhta-s	Haman Zal	;21.51
37	AUNIIAD KIIAN 17101-8362452-7	GPS Kotak	Hussun Zai	11533
ħr,	MEHROZ KHAN 17102-0537948-3	GPS Gul Abad Yungi	Hisara Nehrl	143-57
39	ASAD ALI 17102-2121297-9	CPS Gul Abad Tangi	Hisara Nehri	135.72
40	SIIAIIID KIIAN 17102-2870858+1	GPS AIS Gul Qilla	Ilisura Nehrl	129-44
41	SHER ALI 17101-8836640-3	GPS Kangra	Kangra	131.62
112	NOOR ULLAII JAN 17101-0167274-9	GPS Ghurambak	Kungra	124.02
42	FATIIUL AMIN 17101-9343851-3	GPS D.Sikandar Khan	Kanyra	116.54
44	SIIAD NIUILANINIAD 17101-7588487-3	GPS Haryana	Kanyra	115.98
45	NAEEM JAN 17101-9764384-5	GPS Haryana	Kanyra	- 115.19
46	ABDUR RAFI JAN 17101-6321182-5	GPS Sadar Garki-3	. Kalozal	99-35
47	SYED ZAHEER ABBAS 17101-0960254-5	GPS Spinkai-s	Katozai	96-43
48	BAKIIT TAJ GUL 17101-2528410-\$	GPS Dheral Kor	Katozal	129.51
49	ZIA RAFIQ 17101-0377826-3	GPS Katotul-1	Katozai	180.86
50	AIUIIAAIAIAD AWAIS 17101-4275472-1	GPS Kutozai-2	Kutozal	112.95
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
53	RIAZ AJINIAD 17103-9703868-5	GPS Londi Roud	Koz Uchram Dheri	132,19





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

	• •			
54	AMROUZ KHAN 17102-2651249-1	GPS Landi Rond	Koz Behram Dheri	122.07
35	MAJID KIIAN 17102-7714899-5	GPS Arut Killi	Koz Behram Dherl	119.64
56	MUKIITAR ULLAH 17102-1163877-1	GPS Islamabad Deobandl	Koz Behrum Dheri	119.20
67	NAZIR AIIMAD 17102-6036836-7	GPS Mardhand No.1	Koz Behram Dheri	112-46
88	17103-0348097-5	GPS M. Roston Khel	AS.AS Kital	131.51
59	ABDUS SALANI 17301-3407039-1	GPS Matta Mayhal Khel	M.M Khel	124.18
60	SAEED KIIAN 17101-7276529-3	GPS Matta Maghal Khel	M.M Khel	114.32
6;	WISAL AHASAD 17101-4418397-3	* CPS Hassan Gul Kor	M.M Khel	106.07
62	RAILANI SIIID KIIAN 17101-9461238-9	GPS Krapa Muhammad Khan	M.M Khel	105.96
63	SYED ZIAUDDIN BADSILAH 17101-0275214-9	GPS Daryab Kor	M.M Khel	104.98
64	YASIR KIIAN 17102-2872837-3	GPS Mandoni	Mondoni	11251
65	MUILANMAD TAYYEB 17102:7302181-1	GPS Tangl No.1		133-24
66	NIUILANIMAD ISMAIL SILAIIID 17102-0407188-7	GPS Tangl No.3	MCTangl	J#J.96
67	MUITAMMAD DAWOOD KITAN 17108-7433487-7	GPS Tangl No.s	ATC Tangi	118.34
68	KHALIL ULLAH 17101-0401414-5	GPS Utmanzai-3	NIC Vintanzai	124.07
69	ROOII UL ANIIN 17101-0365780-5	GPS Dag Shamozal	MC Unnanzal	113-31
70 1	FARHAD ALI 17101-3558119-9	. GPS Katigon	MC Ulmanzai	108.25
71 1	MUHAMMAD YAR 17101-0310807-3	GPS Charsadda-3	MC-s Charsadda	130.01
	NIUILANINIAD ADIL JAN . 17101-9006856-5	GPS Bosa Khel-z	MC-s Chareadda	104.19
77	NIOAZANI JAN 17101-8006111-9	GPS Qazi Khel-2	NIC-s Charsadda	122,53
74	DAXGIT NIUNIR 17101-0397973-1	GPS Sadiq Abad	MC-s Shabqadar	126.67
76 I	IRFAN ULIAJI 17301-4722563-9	GPS Rahmatullah Khan Kor	MC:s Shabqadar	118-4
	MAJID SI[A][17101-8067215-1	GPS Rahmatullah Khan Kor	MC-s Shabqadar	109.49
77 I	INAM UL IIASSAN / / / / / / / / / / / / / / / / / / /	GPS Tambulnk	NIC-2 Charsadda	. 121.71
	MUHAMMAD ZEESHAN 17101-9729175:5	GPS Khat Killi	MC-2 Charsadda	115.17
,, ,	RASOOL SIIAII 17101-4723173-3	GPS Prang-1	MC-2 Charsadda	114.8
, 1,	ISFANDN'AR 17101-11975974-7	GPS Prang-3	MG-2 Charsadda	.409.04
, 2	TAFAR KILAN 17101-7165544-7	GPS Shabqadar Fort-9	MC-2 Shabqadar	99.7
	71LA WAR SHAH 7101-4419772-5	GAIPS Babea	MC-s Chd	114.04
	TARIQ JAN	GPS Attakl-g	MC-3 Shabqadar	96.94
	7101-1602078-9	0,0 %,	mos simuladas	,,,



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

			•	•
8.	ADNAN HUSSAIN 17301-0949488-7	CPS Conda	MC-3 Shabqadar	122.0
80	NIOIIIII ULLAII 17101-0108796-9	GPS Attaki-2 MC-3 Shabqadar		100.96
87	SAYYED MASOOD AHMAD	GPS Attaki-2	GPS Attaki-2 MC-3 Shabqadar	
et e	NIAZ A13 17101-1124090 3	GPS Attabl 3	AIC y Shahqadar	11111-11-
89	USALAN ALI 17101-5122374-1	GPS Asmat Abad	NIC-4 Charsouldo	116.6
90	HISAN ULLAH ALIAS ASAD 17101-0308575-3	'GPS Umar Abad	MC-4 Charsudda	115:34
91	NUSRATALI 17101-0253139-3	CPS IslamAbad-2	MC-4 Charsadda	101.79
92	WAJIII ULIAII 17101-0413010-5	GPS Fagir Abad	Mera Prany	143-47
93	FAZALANIN 17101-0958822-3	GPS Sheikh Munof killi	Alera Umarzal	125.38
94	NUILANINIAD INIRAN 17101-9521339-3	GPS Ewaz Killi	Alera Umarzai	124.57
95	ALAMZEU KILAN 17101-3836322-3	GPS Nawab Khan Koro	Alera Umarzai	117.94
96	ASIF SHAII 17101-2062079-9	GPS Shalmano Killl	Alera Vinarzal	116.10
97	SHAIID-ALI 17102-9561338-5	Grs Dildar Garki	Mirsa Dher	120.49
98	ISIITIAQ AIIMAD 17102-5847695-7	GPS Mian Suhib Garhi	Alleza Dhee	113.93
99	YASIR KIIAN 17101-0203548-5			125.6
100	QAISAR ALI 17101-7317747-3	GPS Muhammad Nari	Muhammad Nari	118.45
101	SIIAIIID KIIAN 21407-5793986-5	GPS Skah Afzal Abud	Nuhammad Nari	118.25
103	WAJID ULLAII 17101-0357508-5	GPS Ghandail Khan Kor	Nissatta	132.78
103	SHEHER GILAYAS KILAN 17101-7071293-3	GPS Purag-1	Nissatta _.	130.3
104	NIANIAT ULLAJI 17101-2435986-3	CPS Minn Inc.	Panjpao	141-53
105	ROKIIAN ALI 17101-9080500-9	GPS Daluzuk	Panypao	133-66
106	ZUBAIR KIIAN 17103-0342333-9	GPS Shahbaz Khan Kor	Panjpao	125.45
107	MIRZĄ ALI KIIAN 17103-0340645-\$	GPS Pir Qilla No.1	Panjpao	122.66
108	SILAH MUHAMMAD 21407-4142405-3	GPS Yarjan Killi	Panjpao	114.36
109	AKIITER ALI 17101-0257749-1	· GPS Angur Kor	Kajjar-1	144.92
(110)	ABDUL MUSAN/IR 17101-3401857-5	GPS Augar Kor	Rajjar-1	132.1
111	OWAIŞ ULLAII 17101-7120368-1	GPS Sulai Kamar	Raijar-s	119-43
112	SHAH AYAZ UDDIN 17101-0271844-3	GPS Raijar-1	Raijar-s	102.35
113	TAHIR ALI SHAH 17101-8707068-5	GPS Shekar Dhand	Raijar-#	118.74
114	ATTA ULLAII JAN 17101-0983778-5	GPS.Rahima '	Rajjar-2	117.98
115	MIANZOOR ALI 17101-1819839-7	GPS Gujrano KIIII	Raljar-2	109.71
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To be substituted with No and Date Appointment Order PST Ad hoc Basis

		Million O'llor 20222		
/"	6 NUHAMMAD BASIR 17101-1420852-7	GPS Wardagu-1	Raijar-2	107.59
	SADEEQ ULLAH 17101-6320758-7	GPS Kodai-2	Rashakal	96.2
118	MUSTAFA ZEB	GPS Roshakai	Hushakal	93-93
119	Annulai KHAN	GPS Zrawar Khan Kor	Rashakal	87.29
120	GUL KAJ KUAN	GPS Banda Rashukai	Kashakai	118.53
121	ZAKIR ULLAH	GPS Banda Kashakai	Rashakal	117-43
122	NUHAMMAD SAJJAD 17101-1895884-3	GPS Chundul Kor	Kashakai	114.17
123	KHAN MUHAMMAD 17101-1059/34-3	CPS Mian Killi x	Rashakal	107.21
124	KARAM ILAIII 17101-0321468-5	GPS Ajoon Killi	Sarki Titara	127.52
125	ISIITIYAQ AIIAIAD 17101-2752491-3	GMPS Hayat Gul Kor	Sarki Titara	124.92
126	FAWAD AIINIAD 17101-0303540-3	GPS Julal Killi-9	Sarki Titara	118.25
127	IRSHAD ALI 17101-0993454-5	GPS Antonr Killi-1	Sarki Titara	120.41
128	7AIN UL ARIDEEN 17101-4689553-3	GPS Sarki Titarası	Sarki Tilara	112.05
129	JANIL MUHAMMAD KHAN 17101-0377280-9	GPS Haqdar Qulurui	Sark i Tita ra	111.20
130	NUSTAFA 17102-9575090-9	GPS Chail	Shodag	134.38
13t	HAROON KHAN 17101-3800476-1	GPS D. Ghulam Qadir	Tarnab	130.34
132	SILAILAII ALI 17101-0874659-3	GPS D. Mukarram Khan	Tarnab	110.7
133	MUDASSIR SIIAII 17101-3398831-9	GMPS Tankhazai	Turangzai	126.55
134	WAQAR ALI SHAH 17101-7624422-5	GPS Anwar Muhal-2	Turangzai	121.33
135	ZIA VLLAH 17101-7128195-1	GPS Anwar Mahal-2	Turangzal	112.97
136	MUHAMMAD YASIR 17101-8371336-5	GPS Eidgah	Umarzai	121.89
137	WASIQ JAN 17101-6328961-3	GPS Umarzai-2	Umarzai	118.65
138	NAEEM JAN 17101-0332021-1	GPS Yakh Kohl	Untarzai	115.59
139	ATTAULLAII NOOR 17101-5067018-7	GPS Zahoor Abad	. บทุเลาzal	113.3
	AFTAB AIIMA D 17101-9526663-5	GPS Chitla Dheral	Umarzal	109.25
	SABER SILAH 17102-8126097-7	GPS Zukrab Gul	Ziam	130.56
	MUHAMMAD TUFAIL 17102-6314292-7	GPS Hamaish Gul Killi	Ziam	129.4
	ROSIIAN KIIAN 17102-4224859-5	GPS All Jan Killi	Ziam	122.65
	YOUSAF KIIAN 17102-9866008-5	GPS Hisara Mlana	Ziam	118.35



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

TERMS & CONDITIONS.

- 1. NO TA/DA cic is allowed.
- 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 handed 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 bogus. 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 10 days of the issuance of this notification. In case of failure to join their post within 10 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal ete shall be entertained..
- 9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- 10. Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
- 11. He will be governed by such rules and regulations as may be issued from time to time by the Goot.
- 12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be preceded under the rules framed from time to time.
- 13. His appointment is made on School based, He will have to serve at the place of posting, and his service is not transferable to any other station.
- 14. Before handing over charge once again their document may be checked if they have not 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: -

- t. 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 CERTIFICATE

(1) B

Name of Official IKRAM-UL-HAO	
Casie or race AFGHAN	
Father's Name ABDIII DAYVAN	
Residence Village and P.O. Nahagir, Toh: Shabquar	
Dist: Charisadda.	
Date of birth 2 - 2 - 1986	
Exact height by measurement .5' 5"	
Personal mark of identification A soon mark on Right Hand	
Signature of the Official (17101 - 6170115-7)	
Signature of head of office	
•	
Seal of Office	
<u> </u>	
I do hereby certify that I have examined Mr Jhram - ul - Hagy	
a candidate for employment in the office of the Education Depatt-	
and can not discover that he had any disease communicable or other constitutional	
affection or bodily infirmity except	
l do not consider this as disqualification for employment in the office of the	
His age according to his own statement is 98 years	 !
years and by appearance about Hat Said. years.	
LEFT HAND THUMB AND FINGER IMPRESSIONS Medical Superburadent To Common DHQ Hospitch Challadda	

هد المصوى و يخطران المج يمن على جارمده ك اح الكتام مردان عمل منديد الى كذولاك خال ا ماميون إلي إك سكول يسد (Adhne School Based الرون ك المنطق بارسد كم يحوق ال المهد الدن الم المهدارة والمرام و 201 ملادك 101 مكد وفوات المالي ر فاست درم این ل انی NTB ک دعب ساعد (http://www.nts.org.pw) والیاب ب- در سه کستگل در مترده تاسط محزر الے بدم مريدوالدرواسون يرفريس كامانا-تلك0 الميت JUFE لااے، لدائیں کا سادی اللید کمی کم کسٹیم شدہ ہے خوتی ہے ہدی لیام ملکھید والم سادی الدائیوی اے۔ ذکری JV35t 18 ان ایم کمش کم یکی تسلیم شده و ندوش سے اوا (اخدر) اولا لی سان ایم کمش BPS.15 1 زىائح لااے لاای کاک کی تحلیم شدہ نے غور تی ہما کے سال اوانک اس کو ٹی مرکعک 35118مال **BPS-15** لیائے آبالی ی إسادی قابلید می می تسلیم شد و لدوئ سے بعدایک سالد وزیر الح سان فیریک اسم کمش ل ال ال J أوى أ ول عدادكم للكيد إد كرسادك البيد BPS-15 35018 مال الحرائس و میکندورون کمی می تسلیم شده برداست بسد شهاد ۱ العالمید فی المعلوم العربید الاسلام می می می می می العم 4 المكل الوقال الدادى يا واراسلوم ميده تريف موات أوار لعلم عاد بال موات واراملوم بر ال واراملوم ودوق برال يا كى كى حليم شده يوندو تى سام كى شريخند كاس امز وكرى BPS-15 JU35F20. الى الى ك (ميكند دويون) كم بمي تعليم شد، برواست بمد شهادة العاليه كي منظور شده عليم الوفاق المداري إ IJ 5 رار المعلوم ميدو شريف موات فارسلوم عاربات ما ماسك ما ماسلوم حرال والعملرم دون حرال استينفر دويش المراب BPS-15 35120 مال 6 ا عرصید بد بعد منظ الحر آن ادرمند ترات کی کی منتورشده ادارے سے 31 BPS-12 35118مال 7 ا ظرمیڈیٹ یا مسادی مرفیکیٹ کی محتظیم شدہ ہودائے بھری ائری کو کو کی پھرمیٹکیٹ اڈ پلو مدان ایج کیشن انکی لماليمل متعادات سے الی الی الی ورسینفرورین محصور شده بروز سے بعد 2 سالدابسوی اید و کری ال BPS-12 35118 مال الجيش كالمح المعلم شداد في غوال _ (Selection Criteria) المكشن كرستموليا:

اما قذہ کے مشیق کر فرادون ویل ایس کر 2000 فبرات کی تعمیم کررہ سے کی جا گئی۔ استر خنگ خسر میں ایس کا 2000 فبرات کی تعمیم کررہ سے کی جا گئی۔

برهام بيوا مدول ويريو	المريك محت براج ١٥٥ = 100 كبر
ب قبلی قابلیت = 100 فمبرجم اکامزیاتشیم می طرح بوگ	تعليمي قايليت
IN	اليماليمي
مال كرو المر 20: تشيم كل غبر	ابغداره/اتلدالحرى
مامل کردولبر ۲۵۸ کشیم کل نیر	مركار بادارا
مامل کرده نبر ۱۵۰ تغییر کار	ا کیا ہے اور ا
ماحل کرده نبر کل فرد العمیری فر	برآ سال كيليسطر بيشه دان تابيد
ما كل كده لمري المعربي في	الجايد الجاساء كم يش
مامل کرد انبر ۱۶۰ تشیرکارنی	डाई।प्रेरी
ع) مال کروفرر ۱۵۰ مرکار	بوت: ا: برسکول کا آسای کیلے ملحہ ملحہ من از من اس من از ا

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





Personal Information of Mr IKRAM UL HAQ d/w/s of ABDUL dayyan

Personnel Number: 00731712

CNIC: 1710161701157

Date of Birth: 02.02,1986

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

80634893-DISTRICT GOVERNMENT KHYBE

DDO Code: CA6255-Govt. Primary Schools (Male) Shabqadar District Charsadda Cash Center:

Payroll Section: 001 GPF A/C No: V.22CP.P.54 GPF Section: 001 GPF Interest applied

GPF Balance:

339,667.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil

BPS: 14 Pay Stage: 8

Wage type		Amount	Amount Wage type		Amount
1000	Basic Pay	36,450.00	1001	House Rent Allowance 45%	3,321.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	350.00	2199	Adhoc Relief Allow @10%	243.00
2316	Teaching Allowance 2021	3,036.00	2341	Dispr. Red All 15% 2022KP	3,330.00
2347	Adhoc Rel Al 15% 22(PS17)	3,330.00	2378	Adhoc Relief All 2023 35%	12,148.00

Deductions - General

Wage type		Amount	ount Wage type	
3014	GPF Subscription	-3,900.00	3501 Benevolent Fund	-1,200.00
3609	Income Tax	-311.00	3990 Emp.Edu. Fund KPK	-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	160,000.00	-5,333.00	16,009.00

Deductions - Income Tax

Payable:

4,751.74

Recovered till JAN-2024:

2,012.00

Exempted: 1187.34

Recoverable:

1,552.40

Gross Pay (Rs.):

66,564.00

Deductions: (Rs.):

-11,479.00

Net Pay: (Rs.):

55,085.00

Payee Name: IKRAM UL HAQ Account Number: 0010032432860010

Bank Details: ALLIED BANK LIMITED, 250180 Patang Chowk Ring Rd.Peshawar Patang Chowk Ring Rd.Peshawar, Peshawar

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address:

City: DF

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: ikramulhaqhaqqani@gmail.com



^{*} All amounts are in Pak Rupees * Errors & omissions excepted (SERVICES/02.02.2024/22:41:46)