

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 1271/2024

Khalil Ullah

Vs

Govt of Khyber Pakhtunkhwa & others

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Respondent

**DISTRICT EDUCATION OFFICER
(MALE) CHARSAJDA**

1

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 1271/2024

Khalil Ullah

Vs

Govt of Khyber Pakhtunkhwa & others

Khyber Pakhtunkhwa
Service Tribunal

Diasy No. 17537

Dated 01-11-24

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.

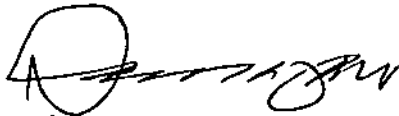
PARA WISE REPLY ON FACTS:

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 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.

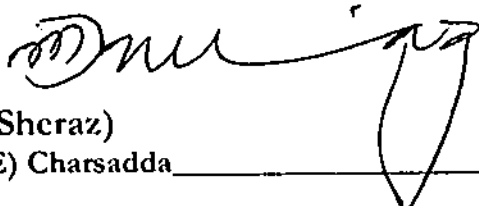
GROUND

- 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 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 _____

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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 1271/2024

Khalil Ullah

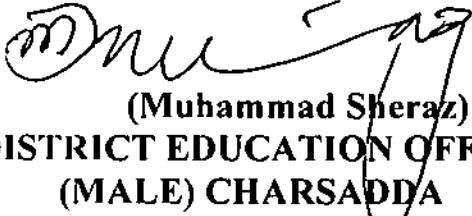
Vs

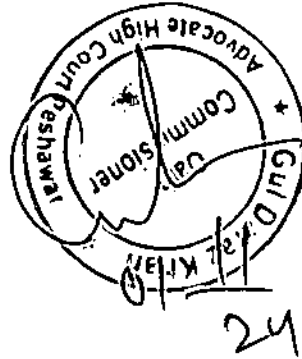
Govt of Khyber Pakhtunkhwa & others

AFIDAVIT

I Mr. Muhammad Sheraz DEO (M) Charsadda do hereby solemnly affirms that the information provided by the DEO (M) and the contents of the Para-wise 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 off/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 EDUCATION OFFICER
MALE CHARSADDA



4/B

**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. 9.6.33-L13 /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 & n/action 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).
5. 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.


(SAMINA ALTAF)
DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

②
ATTESTER

A. (5)

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

S.#	Name	School Name	U/C	Score
1 ✓	MUHAMMAD KHALID 17102-6537002-5	GPS Station Killi	Abazai	132.89
2 ✓	MARJAN ALI 17101-9760071-5	GPS Sheikh Killi	Agra	121.21
3 ✓	MILAN ADIL SHAH 17101-6844013-5	GPS Agra Bala	Agra	116.33
4 ✓	MUHAMMAD AMEN 17101-9188159-3	GPS Agra Balu	Agra	114.58
5 ✓	TILAWAT SHAH 17101-0113694-5	GPS Mandizai	Battagram	133.59
6 ✓	MUHAMMAD SHOAB 17101-0315588-7	GPS Ashra	Battagram	129.66
7 ✓	SHAH ANWAR 17101-0399895-3	GPS Marozai	Battagram	124.24
8 ✓	MUHAMMAD ASEM 17101-7492491-7	GPS Mathra New	Battagram	121.45
9 ✓	SHAH KHALID 17301-4432180-5	GPS Mathra Qadeem	Battagram	119.30
10 ✓	NASIR KHAN 17101-0307693-1	GPS Khisro Khan Killi	Behlola	135.48
11 ✓	MUHAMMAD ISHTIAQ 17101-3765891-7	GPS Mian Shakh No.6	Behlola	132.34
12 ✓	YASEEN KHAN 17101-2716399-9	GPS Salar Killi	Behlola	132.18
13 ✓	NIZAM ULLAH 17101-6378689-5	GPS Islam Abad Dargai	Dargai	135.83
14 ✓	MUHAMMAD ALI 17101-0300786-9	GPS Nahaqi-1	Daulat Pura	118.45
15 ✓	IKRAM UL HAQ 17101-6170115-7	GPS Ambadher-1	Daulat Pura	116.29
16 ✓	ASIF ULLAH 17101-0826588-1	GPS Daulat Pura	Daulat Pura	114.31
17 ✓	UMAR GUL 17101-6375764-1	GPS Aziz Abad-2	Dheri Zardad	121.66
18 ✓	ABDURAHMAN 17101-0342715-1	GPS Jan Abad	Dheri Zardad	114.33
19 ✓	DAWOOD MASOOD 17101-0328797-7	GPS Kalyar	Dheri Zardad	104.56
20 ✓	ZAFAR ALI 17101-0260821-7	GPS Dosehra-3	Dosehra	116.17
21 ✓	MUHAMMAD GULZAR 17101-2239656-1	GPS Haryana-2	Dosehra	111.12
22 ✓	SIKANDAR SHAH 17101-2156902-9	GPS Check Niasatta	Dosehra	118.55
23 ✓	JAWAD MUHAMMAD 17101-1671324-1	GPS Shah Dhand	Dosehra	117.17

ATTESTED

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

24	KHIZAR HAYAT 17102-7968271-1	GPS Gandheri Payan No.1	Gandheri	137.0
25	MUHAMMAD PERVEZ 17102-6620616-9	GPS Gandheri Uula	Gandheri	133.58
26	ZAHID MUHAMMAD 17102-9586608-9	GPS Gandheri Payan No.2	Gandheri	128.93
27	SHAKEEL AHMAD 17102-7470651-9	GPS Karima Banda	Gandheri	123.06
28	WAQAR KHAN 17101-5363178-3	GPS Malka Dher	Ghunda Karkana	116.56 ✓
29	KAMRAN ULLAH 17101-0319290-9	GPS Malka Dher	Ghunda Karkana	115.09 ✓
30	SHAMS UL HAQ 17101-1857398-9	GPS Baz Nian Killi	Ghunda Karkana	105.70 ✓
31	REHMANULLAH 17103-0354096-1	GPS Ocha Wala-1	Haji Zal	122.25
32	ALI GAUHAAR 17103-0371185-7	GPS Mahmood Abad	Haji Zal	117.8
33	ANWAR ZED 17102-3704269-7	GPS Inzar Killi	Harichand	124.53
34	JAWAD ALI 17101-1922862-5	GPS Khubai	Hassan Zal	128.94
35	MUHAMMAD IZHAAR 17101-3845983-7	GPS Hassan Zal	Hassan Zal	123.63
36	NASEEM KHAN 17101-0395647-3	GPS Sokhia-1	Hassan Zal	121.11
37	ARSHAD KHAN 17101-8362252-7	GPS Kotak	Hassan Zal	115.33
38	MEHROZ KHAN 17102-0517988-3	GPS Gul Abad Tangi	Hisara Nehri	143.57
39	ASAD ALI 17102-2121297-9	GPS Gul Abad Tangi	Hisara Nehri	135.72
40	SHAHID KHAN 17102-3870858-1	GPS MS Gul Qilla	Hisara Nehri	129.44
41	SHER ALI 17101-8836640-3	GPS Kangra	Kangra	131.62
42	NOOR ULLAH JAN 17101-0167274-9	GPS Ghurambak	Kangra	124.02
43	FATHULAMIN 17101-9343851-3	GPS D.Sikandar Khan	Kangra	116.54
44	SIYAD MUHAMMAD 17101-7588487-3	GPS Haryana	Kangra	115.98
45	NABEEN JAN 17101-9764384-5	GPS Haryana	Kangra	115.19
46	ABDUR RAFI JAN 17101-6321182-5	GPS Sadar Garhi-3	Katozai	99.35 ✓
47	SYED ZAHEER ABBAS 17101-0960254-5	GPS Spinkal-1	Katozai	96.43
48	DAKHT TAJ GUL 17101-2528410-5	GPS Dherai Kar	Katozai	122.51
49	ZIA RAFIQ 17101-0377826-3	GPS Katozai-1	Katozai	120.86
50	MUHAMMAD AWAIS 17101-4275472-1	GPS Katozai-2	Katozai	112.95
51	SHER BAZ KHAN 17101-9168708-7	GPS Spinkal-2	Katozai	105.58
52	ZULFIQAR ALI 17101-0310390-9	GPS Chanyana	Khan Nahi	128.51 ✓
53	RIAZ AHMAD 17102-9703868-5	GPS Landi Roud	Koz Uchram Dheri	132.39

ATTESTED

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

54	ANROOZ KHAN 17102-2651249-1	GPS Landi Road	Koz Behram Dheri	122.07
55	MAJID KHAN 17102-7714899-5	GPS Arat Killi	Koz Behram Dheri	119.64
56	MUKHTAR ULLAH 17102-1163877-1	GPS Islamabad Deobandi	Koz Behram Dheri	119.22
57	NAZIR AHMAD 17102-6036836-7	GPS Mardhand No.1	Koz Behram Dheri	112.46
58	WISAL AHMAD 17103-0348097-5	GPS M. Rustam Khel	M.M Khel	131.51
59	ABDUS SALAM 17301-3407039-1	GPS Multa Mughal Khel	M.M Khel	124.18
60	SAEED KHAN 17101-7276529-5	GPS Multa Mughal Khel	M.M Khel	114.32
61	WISAL AHMAD 17101-4418397-3	GPS Hassan Gul Kor	M.M Khel	106.07
62	RATIAM SHIH KHAN 17101-9461238-9	GPS Krupa Muhammad Khan	M.M Khel	105.96
63	SYED ZIAUDDIN BADSILAJI 17101-0275214-9	GPS Daryab Kor	M.M Khel	104.98
64	YASIR KHAN 17102-2872837-3	GPS Mandani	Mandani	112.51
65	MUHAMMAD TAYYEB 17102-7302181-1	GPS Tangi No.1	MC Tangi	133.24
66	MUHAMMAD ISMAIL SILAJI 17102-0407188-7	GPS Tangi No.3	MC Tangi	123.96
67	MUHAMMAD DAWOOD KHAN 17102-7433487-7	GPS Tangi No.1	MC Tangi	118.34
68	KHALIL ULLAH 17101-0401414-5	GPS Utmanzai-3	MC Utmanzai	124.07
69	ROOH UL AMIN 17101-0365780-5	GPS Dag Shamoza	MC Utmanzai	113.31
70	FARHAD ALI 17101-3658119-9	GPS Katigon	MC Utmanzai	108.25
71	MUHAMMAD YAR 17101-0310807-3	GPS Charsadda-3	MC-1 Charsadda	130.01
72	MUHAMMAD ADIL JAN 17101-9006856-5	GPS Bosa Khel-2	MC-1 Charsadda	104.12
73	MOAZAN JAN 17101-8006111-9	GPS Qazi Khel-2	MC-1 Charsadda	122.53
74	BAKIT MUNIR 17101-0397973-1	GPS Sadiq Abad	MC-1 Shabqadar	126.67
75	IRFAN ULLAH 17301-4722563-9	GPS Rahmatullah Khan Kor	MC-1 Shabqadar	118.4
76	MAJID SHAH 17101-8067215-1	GPS Rahmatullah Khan Kor	MC-1 Shabqadar	109.49
77	INAM UL HASSAN 17101-1254810-1	GPS Tambuluk	MC-2 Charsadda	121.71
78	MUHAMMAD ZEESHAN 17101-9729175-5	GPS Khat Killi	MC-2 Charsadda	115.17
79	RASOOL SHAH 17101-4723173-3	GPS Prang-1	MC-2 Charsadda	114.8
80	ASFANDIYAR 17101-3975974-3	GPS Prang-3	MC-2 Charsadda	109.01
81	ZAFAR KHAN 17101-7165544-7	GPS Shabqadar Fort-2	MC-2 Shabqadar	99.7
82	DILAWAR SHAH 17101-4419772-5	GPS Uabrn	MC-3 Chd	114.04
83	TARIQ JAN 17101-1602078-9	GPS Attaki-3	MC-3 Shabqadar	96.94
84	HISAN ALI 17103-0368397-7	GPS Attaki-3	MC-3 Shabqadar	94.47

ATTESTED

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

85	ADNAN HUSSAIN 17301-0939488-7	GPS Gonda	MC-3 Shabqadar	122.0
86	MOHAMM ULLAH 17101-0108796-9	GPS Attaki-2	MC-3 Shabqadar	100.96
87	SAYYED MASOOD AHMAD 17101-2505470-1	GPS Attaki-2	MC-3 Shabqadar	100.88
88	NIYAZ ALI 17101-1124149-3	GPS Attaki-2	MC-3 Shabqadar	100.07
89	USMAN ALI 17101-5122374-1	GPS Asmat Abad	MC-4 Charsadda	116.6
90	HISAN ULLAH ALIAS ASAD 17101-0308575-3	GPS Umar Abad	MC-4 Charsadda	115.34
91	NUSRAT ALI 17101-0251139-3	GPS IslamAbad-2	MC-4 Charsadda	101.79
92	WAJID ULLAH 17101-0413010-5	GPS Fajir Abad	Mera Prang	143.47
93	FAZAL AMIN 17101-0958822-3	GPS Sheikh Mumf Killi	Mera Umarzai	125.38
94	BUJLAMMAD IMRAN 17101-9521339-3	GPS Ewar Killi	Mera Umarzai	124.57
95	ALAMZED KILAN 17101-3836322-3	GPS Nawab Khan Koro	Mera Umarzai	117.94
96	ASIF SHAH 17101-2062079-9	GPS Shalmano Killi	Mera Umarzai	116.10
97	SHAHID ALI 17102-9361338-5	GPS Dikhar Garhi	Mera Dher	120.42
98	ISHTIAQ AHMAD 17102-5847695-7	GPS Mian Sahib Garhi	Mera Dher	113.93
99	YASIR KILAN 17101-0203548-5	GPS Inam Killi	Muhammad Nari	125.6
100	QASAR ALI 17101-7317747-3	GPS Muhammad Nari	Muhammad Nari	118.45
101	SHAHID KILAN 21407-5793986-5	GPS Shah Afsal Abad	Muhammad Nari	118.25
102	WAJID ULLAH 17101-0357508-5	GPS Ghandail Khan Kor	Nisatta	132.78
103	SHEHER GILAYAS KILAN 17101-7071293-3	GPS Parao-1	Nisatta	130.3
104	NIAMAT ULLAH 17101-2435986-3	GPS Alina Jan	Panjpao	141.53
105	ROKIAN ALI 17101-9080500-9	GPS Dalauk	Panjpao	133.66
106	ZUDAIR KILAN 17103-0342333-9	GPS Shahbaz Khan Kor	Panjpao	125.45
107	MIRZA ALI KILAN 17103-0340645-5	GPS Pir Qilla No.1	Panjpao	122.66
108	SILAJI MUHAMMAD 21407-4142405-3	GPS Yarjan Killi	Panjpao	114.36
109	AKJITER ALI 17101-0257749-1	GPS Angur Kor	Rajjar-1	144.92
110	ABDUL MUSAWIR 17101-3401857-5	GPS Angur Kor	Rajjar-1	132.1
111	OWAIS ULLAH 17101-7120368-1	GPS Sulai Kamar	Rajjar-1	112.43
112	SILAJI AYAZ UDDIN 17101-0271844-3	GPS Rajjar-1	Rajjar-1	102.35
113	TAHIR ALI SHAH 17101-8707068-5	GPS Shakar Dhand	Rajjar-2	118.74 ✓
114	ATTA ULLAH JAN 17101-0983778-5	GPS Rahima	Rajjar-2	117.88 ✓
115	MANZOOR ALI 17101-1819839-7	GPS Gufrano Killi	Rajjar-2	109.71 ✓

ATTESTED

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

116	MUHAMMAD BASIR 17101-1420852-7	GPS Wurdaga-1	Rajjar-2	107.59
117	SADEEQ ULLAH 17101-6320758-7	GPS Kodai-2	Rashakai	96.2
118	MUSTAFA ZEB 17101-4604514-5	GPS Rashakai	Rashakai	93.93
119	ABDULLAH KHAN 17101-6417238-9	GPS Zrarwar Khan Kor	Rashakai	87.29
120	CH. RAJ KHAN 17101-4325040-3	GPS Banda Rashakai	Rashakai	118.53
121	ZAKIR ULLAH 21407-5670864-5	GPS Banda Rashakai	Rashakai	117.43
122	MUHAMMAD SAJJAD 17101-1895884-3	GPS Ghundal Kor	Rashakai	114.17
123	KHAN MUHAMMAD 17101-1059131-3	GPS Minn Killi	Rashakai	107.21
124	KARAM ILLAH 17101-0321468-5	GPS Ajoon Killi	Sarki Titara	127.52
125	ISHTIYAQ AHMAD 17101-2752491-3	GNPS Hayat Gul Kor	Sarki Titara	124.92
126	FAYAD AHMAD 17101-0303540-3	GPS Julal Killi-2	Sarki Titara	118.25
127	IRSHAD ALI 17101-0993454-5	GPS Anwar Killi-1	Sarki Titara	120.41
128	ZAIN UL ABIDEEN 17101-4689553-3	GPS Sarki Titara-1	Sarki Titara	112.05
129	JAMIL MUHAMMAD KHAN 17101-0377280-9	GPS Haqdar Qulurui	Sarki Titara	111.20
130	MUSTAFA 17102-9575090-9	GPS Chail	Shodap	134.38
131	ILAROON KHAN 17101-3800476-1	GPS D. Ghulam Qadir	Tarnab	130.34
132	SHAJAB ALI 17101-0874659-3	GPS D. Mukarram Khan	Tarnab	110.7
133	MUDASSIR SHAH 17101-3998831-9	GNPS Tankhuzai	Turangzal	126.55
134	WAQAR ALI SHAH 17101-7624422-5	GPS Anwar Mahal-2	Turangzal	121.33
135	ZAK ULLAH 17101-7128195-1	GPS Anwar Mahal-2	Turangzal	112.97
136	MUHAMMAD YASIR 17101-8371326-5	GPS Eulyah	Umarzal	121.89
137	WASIQ JAN 17101-6328961-3	GPS Umarzal-2	Umarzal	118.65
138	NAEEM JAN 17101-0332021-1	GPS Yakh Kohi	Umarzal	115.59
139	ATTAULLAH NOOR 17101-5067018-7	GPS Zahoor Abad	Umarzal	113.3
140	AFTAB AHMAD 17101-9520663-5	GPS Chilla Dherai	Umarzal	109.25
141	SABER SHAH 17102-8186097-7	GPS Zuhrah Gul	Ziam	130.56
142	MUHAMMAD TUFAIL 17102-6314292-7	GPS Hamaiash Gul Killi	Ziam	129.4
143	ROSILAN KHAN 17102-4224859-5	GPS Ali Jan Killi	Ziam	122.65
144	YOUSAF KHAN 17102-9866008-5	GPS Hisara Ajiana	Ziam	118.35

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Abbested

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

TERMS & CONDITIONS.


1. NO TA/DA etc 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 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 etc 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 Govt.
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 proceeded 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:-

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

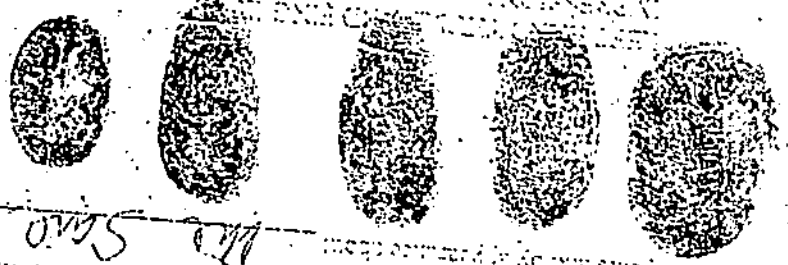

31/5/14
District Education Officer
(Male) Charsadda


ATTESTED

2/6/84
21

ATTESTED

Federal Bureau of Investigation
Department of Justice
Washington, D.C. 20535



The undersigned hereby certifies that the person named above is
the same person as the person named in the certificate of the
Department of Justice, Bureau of Investigation, Washington, D.C.

I do not consider this as being sufficient for employment in the office of the
Director of the FBI, Washington, D.C.
and can not discover that he has any other employment or other occupational
activity in the office of the Education Department CIA
KHALIL ULLAH
Son of Office

Name of Official: KHALIL ULLAH
Title of Job: AFGHAN
Present Name: KHAR ULLAH
Address: Mohallah, Khawaj, Khel Village 34 P/O
Ulmanjga, Tehsil 31 District Charsadda
Date of Birth: 01-01-1984
Exact height by measurement: 5'1" - 70
Personal mark of identification: NIL
Signature of the Official: [Signature]
Signature of the Clerk: [Signature]

FEDERAL BUREAU OF INVESTIGATION

GS 2-23-NWP-27 85-2000 2 of 100-29-7-92 (15)

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Sl. No.	Post Name	Grade	Selection Criteria
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2	...	BPS-15	...
3	...	BPS-15	...
4	...	BPS-15	...
5	...	BPS-15	...
6	...	BPS-12	...
7	...	BPS-12	...

Adhoc School ...
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 2019 ...
 2020 ...
 2021 ...
 2022 ...
 2023 ...
 2024 ...
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 2026 ...
 2027 ...
 2028 ...
 2029 ...
 2030 ...

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (September-2024)



13

Personal Information of Mr KHALIL ULLAH d/w/s of KHAIR ULLAH

Personnel Number: 00382813 CNIC: 1710104014145

NTN:

Date of Birth: 01.01.1984 Entry into Govt. Service: 01.09.2014

Length of Service: 10 Years 01 Months 001 Days

Employment Category: Vocational 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 Cash Center: 02

GPF A/C No: Interest Applied: Yes GPF Balance: 349,025.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 14 Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	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%	226.00
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
2393	Adhoc Relief All 2024 25%	9,112.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3014	GPF Subscription	-3,900.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-963.00	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	250,000.00	-10,000.00	110,000.00

Deductions - Income Tax

Payable: 15,395.80 Recovered till September-2024: -2,889.00 Excmpted: 3847.99 Recoverable: 8,658.81

Gross Pay (Rs.): 75,659.00 Deductions: (Rs.): -16,798.00 Net Pay: (Rs.): 58,861.00

Payee Name: KHALIL ULLAH

Account Number: 0002178900157603

Bank Details: HABIB BANK LIMITED. 220191 UTMANZAI, CHARSADDA. UTMANZAI, CHARSADDA.. CHARSADDA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: d

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email:

ATTESTED