


The appeal of Mr. Sajid Sardar, Watcher wild Life Division Kohat received today i.e. on 17.09.2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 5- Copy of impugned order dated 12.4.2021 is illegible which may be replaced by legible/better one.
- 6- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 7- Affidavit may be got attested by the Oath Commissioner.
- 8- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1867 /S.T,

Dt. 20/09 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv. Pesh.

Sir,

all the objections removed & file resubmitted
Jal
Shir

13.12.2021

Clerk of learned counsel for the appellant present.

Former seeks adjournment on the ground that learned counsel for the appellant is busy before the Peshawar High Court, Peshawar. Adjourned. To come up for preliminary hearing on 22.02.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.05.2022 for the same as before.


Reader

18.05.2022

Appellant in person present and requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for preliminary hearing on 27.07.2022 before S.B.

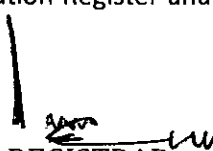

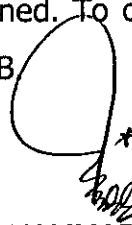

(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7471 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/09/2021	<p>The appeal of Mr. Sajid Sardar resubmitted today by Syed Noman Ali Bukhari 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> <p>2-</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>23/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>23.11.2021</p> <p>Clerk of learned counsel for the appellant present.</p> <p>Learned counsel for the appellant seeks adjournment on the ground that his counsel is not available. Adjourned. To come up for preliminary hearing on 13.12.2021 before S.B.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Sajid Sardar vs Wild life dept-

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Syed Noman Ali Bulcher</u>	✓	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?		
13.	Whether copy of appeal is delivered to A.G/D.A.G?		
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?		✓
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?		
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?		
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Syed Noman Ali Bulcher

Signature: [Handwritten Signature]

Dated: _____

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 7471 /2021

Sajid Sardar

VS

wild Life Deptt.

INDEX

S.NO.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	01-07
2.	Affidavit	-----	08
3.	Suspension of recovery application	-----	09-10
4.	Copy of appointment order	A	11
5.	Copy of posting order	B	12
6.	Copy of Charge sheet	C	13-15
7.	Copy of charge sheet reply	D	16-17
8.	Copy of record	E	18-25
9.	Copy of inquiry	F	26-32
10.	Copy of show cause	G	33-34
11.	Copy of show cause reply	H	35
12.	Copy of order 19.06.2020	I	36-37
13.	Copy of order dated 13.04.2021	J	38-40
14.	Copy of departmental appeal	K	41
15.	Copy of application	L	42
16.	WAKALAT NAMA	-----	43

APPELLANT


Sajid Sardar

THROUGH:


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME OF PAKISTAN,


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. _____/2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No: 7604

Dated: 17-9-2021

Ms. Sajid Sardar, watcher (BPS-7)
Wild Life division Kohat, Wild Life park Kohat.

(APPELLANT)

VERSUS

1. The Secretary, Environment Forestry and Wild life Khyber Pakhtunkhwa, Peshawar.
2. The Chief Conservator Wild Life, Khyber Pakhtunkhwa, Peshawar.
3. The Divisional Forest Officer, Kohat Wild Life Division Kohat.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNALS ACT, 1974, AGAINST THE IMPUGNED ORDER DATED 19.06.2020 AND 13.04.2021 RECEIVED ON 21.04.2021 WHEREBY THE PENALTY OF STOPPAGE OF THREE INCREMENTS AND RECOVERY OF 593,500 IS IMPOSED UPON THE APPELLANT AND AGAINST NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN 90 DAYS OF STATUTORY PERIOD.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER DATED 19.06.2020 AND 13.04.2021 RECEIVED ON 21.04.2021 MAY PLEASE BE SET ASIDE

Filed to
Registrar
17/9/21

ONLY TO THE EXTENT OF THE APPELLANT AND RESTORE THE ANNUAL INCREMENTS FOR APPELLANT FROM DUE DATE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOR OF THE APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant is appointed as wildlife watcher BPS-07 vide order dated 06-09-18. The appellant since appointed work with full zeal and zest. (Copy of appointment order is attached as annexure-A).
2. That the appellant was posted at Kohat Wildlife Park vide order dated 04-12-2018. (Copy of posting is attached as annexure-B).
3. That appellant while performing his duties in the capacity of Wildlife Park Kohat, the charge sheet was served upon him on the allegation mentioned in charge sheet on 23-12-2019. The appellant properly replied to charge sheet & denied the entire allegations leveled against him. (Copy of the charge sheet and reply is attached as annexure-C & D).
4. That the fact pertinent to mentioned here that the allegation which was leveled against the appellant in charge sheet related to time/Era before the posting of appellant. So, the allegation leveled against the appellant is baseless and without any proof (Copy of record is attached as annexure-E).
5. That on above mentioned charge sheet inquiry was conducted against the appellant with co-accused. But no

opportunity of defense was provided to the appellant in inquiry i.e cross examination. Even reply to charge sheet was not considered by the inquiry committee. (Copy of the inquiry report is attached as annexure-F).

6. That on the basis of above mentioned Inquiry Show Cause notice was issued to the appellant without clarify the responsibilities of appellant. The appellant properly replied to show cause notice denied the entire allegation. (Copy of show cause and Reply is attached as annexure-G & H).
7. That thereafter, impugned order dated 19/06/2020 has been passed by the DPO Kohat Division, whereby stoppage for annual increment for two year and recovery of 87000/- RS imposed upon the appellant. (Copy of order is attached as Annexure-I).
8. That quite astonishingly, after impugned order another de-novo inquiry was conducted by the Chief conservator without any notice and reason and the appellant was not associated with the same and copy of inquiry was also not handed over to appellant in violation of E&D Rules 2011 and on the basis of which another impugned order was passed on 12-04-2021, whereby the penalty of stoppage of 3 annual increment and recovery of 593, 500 was imposed upon the appellant. (Copy of impugned order is attached as annexure-J).
9. That the appellant being feeling aggrieved from impugned order filed Departmental Appeal against the impugned order which was not decided within statutory period of 90 days hence the present appeal on the following grounds. (Copy of the departmental appeal is attached as annexure-K).

4
GROUNDS:

- A) That the order dated 19-06-2020 and 12-04-2021 is against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That the appellant has not been treated according to law, rules and most importantly the Posting Transfer Policy of the government.
- C) That the opportunity of personal hearing and personal defense was not provided to the appellant which is against the spirit of Article 10-A of the Constitution.
- D) That neither proper inquiry was conducted examination has been nor was any chance of cross examination, no procedure followed before the penalty was imposed upon the appellant which is against the law and rules.
- E) That the inquiry was conducted jointly against the appellant and other official including Deputy Range officer, so according to RULE 2(f)(ii) of E&D RULE, 2011 "when two or more Government Servant are to be proceeded against jointly, the competent authority in relation to the accused Government Servant senior most, Shall be the competent authority in respect of all the accused". So, in case of the appellant, all the procedure adopted by the incompetent authority which is violation of RULE 2(f)(ii) of E&D RULE, 2011 .. Hence, the impugned order was passed by the incompetent authority and amount to Corrum non Judice, so void in the eye of law. The same principle held in the Superior Court judgments cited as 2014 SCMR 1189.
- F) That in case of the appellant no charge sheet was issued before denovo inquiry which is also violation of Supreme Court judgment Cited as 2008 SCMR 609 wherein clearly stated that inquiry conducted in absence of charge sheet is void-ab-initio and also violation of this tribunal judgment in appeal no: 905/2016 decided on 20.02.2018. In Supreme court judgment cited as 2004 SCMR 294, 2008 PLC cs 1107, 2008

PLC cs 1065 wherein clearly state that the major penalty cannot be imposed on the basis of fact finding inquiry.

- G) That in case of the appellant neither proper order with reason nor notice for disagreement with previous inquiry, issued to appellant before the denovo inquiry, so the whole proceeding is conducted in violation of law and rules.
- H) That no show cause notice was issued before taking adverse action (2nd impugned order) which is violation of rule *Rule-5(a) Read with Rules -7* in case inquiry was not necessary and *Rule-14(b) of the E&D Rules 2011*, in case where regular inquiry is necessary. Which were totally ignored before taking adverse action. The same principle held in the Superior Court judgments cited as 1987 SCMR 1562, 2019 PLC cs 811, 2008 PLC cs 921 and 209 SCMR 605. Further it is added that inquiry report was also not provided to the appellant which was also violation of *Rule 14(c) of the E&D rules 2011*, so the impugned order was passed in violation of law and rules and norms of justice. The same principle held in the Superior Court judgments cited as 1981 PLD SC 176 and 1987 SCMR 1562.
- I) That the opportunity of personal hearing and personal defense was not provided to the appellant which was violation of *Rule 7(d) in case inquiry was not necessary and 14(5) of the E&D rules 2011* in case where inquiry is necessary. The same principle held in the Superior Court judgments cited as 2006 SCMR 1641.
- J) That the sufficient grounds of innocence of the appellant exist as per provision of supreme court judgment cited as NLR 2005 TD supreme Court Page 78" as no one punished for the fault of others. So the impugned order is illegal.
- K) that the appellant never remained negligence in performance of duties because the appellant was transferred on 04.12.2018 and filed application for repairing fence on 27.12.2018 and also performed his

6

duties efficiently. Copy of report is attached as annexure-L.

L) That the fact pertinent to mentioned here that the allegation which was leveled against the appellant in charge sheet related to time/Era before the posting of appellant. Because the animals were missing before the taking charge of the appellant. So, the allegation leveled against the appellant is baseless and without any proof. The proof is already attached as annexure-E.

M) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

APPELLANT


Sajid Sardar

THROUGH:




(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME OF PAKISTAN,

(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT,

(ASAD MEHMOOD)
ADVOCATE HIGH COURT,


(SHAHKAR KHAN YOUSAFZAI)
ADVOCATE PESHAWAR.


CERTIFICATE:


It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.


DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME OF PAKISTAN,


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT,

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

88

SERVICE APPEAL NO. _____/2021

Sajid Sardar

VS

wild Life Deptt.

AFFIDAVIT

I, . Sajid Sardar, watcher (BPS-7) Wild Life division Kohat, Wild Life park Kohat (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honourable Tribunal.

DEPONENT


Sajid Sardar

9

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2021

Sajid Sardar

VS

wild Life Deptt.

.....

APPLICATION FOR SUSPENSION OF ORDER
DATED 19.06.2020 AND 13.04.2021 TO THE EXTENT
OF APPELLANT AND RESTRAINING THE
RESPONDENTS FROM MAKING RECOVERY OF
593,500/-RS FROM APPELLANT TILL THE FINAL
DECISION OF THE MAIN APPEAL.

RESPECTFULLY SHEWETH:

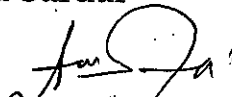
1. That the appellant has filed an appeal alongwith application in which no date has been fixed so far.
2. That the appellant has good prime facie case and all the ingredients of appeal are in favour of the appellant.
3. That the grounds of main appeal may also be considered as integral part of this application.
4. That the impugned order has been passed in violation of Posting, Transfer Policy.
5. That if the order dated 19.06.2020 AND 13.04.2021 is not suspended it will badly affect the right of appellant.

It is, therefore, most humbly prayed that the order dated 19.06.2020 AND 13.04.2021 may be suspended restrained the respondents from making recovery of 593,500/-RS till the disposal of main appeal as the post of the appellant is still vacant. Any other remedy, which this august Tribunal deems fit and appropriate that, may also be awarded in favour of the appellant.

APPELLANT


Sajid Sardar

THROUGH:


(M. ASIF YOUSAFZAI)

ADVOCATE SUPREME OF PAKISTAN,


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT,

AFFIDAVIT:

It is affirmed and declared that the contents of this Application are true and correct to the best of my knowledge and belief.


DEPONENT

(11)

OFFICE ORDER NO. 26 /WL (KT), DATED KOHAT THE 02/10/2018.
ISSUED BY MUHAMMAD ABD-US-SAMAD DIVISIONAL FOREST OFFICER,
KOHAT WILDLIFE DIVISION

A

Consequent upon the recommendations of Departmental Selection Committee constituted vide this Office Order No.15/WL (KT), dated; 06/09/2018, Mr. Sajid Sardar S/O Gul Sardar R/O H#64, Sector E-3, Phase-2, KDA Kohat is hereby appointed as Wildlife Watcher in BPS-07 (Rs.10990-610-29290) plus usual allowances as admissible under the rules against the vacant post under regular budget in Kohat Wildlife Division with effect from the date he report arrival for duty subject to the following terms and conditions:-

TERMS AND CONDITIONS

1. His services will be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, all the laws applicable to the Civil Servants and the Rules made there under.
2. He will be on probation as per Rules-15 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rule 1989.
3. His services will be liable to termination at 15 days notice, at any time without assigning any reason irrespective of the fact that he holds a post other than the one to which he was originally recruited.
4. In case he wishes to resign at any time, an advance notice of one month shall be necessary or in lieu thereof his one month's pay shall be forfeited to government.
5. The appointment is subject to the production of Clearance Certificate from District Police Officer Kohat and necessary medical fitness certificate from the Medical Superintendent of District Head Quarter Hospital Kohat before joining of the position.
6. He will have to undergo one year training course of Forest Guard/ Wildlife Watcher at the Khyber Pakhtunkhwa Forest School Thal, Abbottabad.
7. He will have to verify his all academic certificates, Degrees and Transcripts/ DMCs from respective Boards and Universities.
8. If he failed to report arrival for duty within thirty days of the receipt of this Order, the appointment will stand cancelled automatically.
9. The incumbent will be posted anywhere in the jurisdiction of Kohat Wildlife Division.
10. In case of any political influence for posting/transfer for favorable station or undue favour which is against the public interest, the service of the incumbent will be terminated.
11. No TA/DA will be allowed on first joining his place of duty.

edf
Muhammad Abd-us-Samad
Divisional Forest Officer
Kohat Wildlife Division
Kohat

No. 801-07/WL (KT),

Copy forwarded for information to:

1. The Chief Conservator Wildlife Khyber Pakhtunkhwa, Peshawar please.
2. The Conservator Wildlife Southern Circle Peshawar please.
3. The Sub-Divisional Wildlife Officer Kohat.
4. All Range Officers Wildlife of Kohat Wildlife Division.
5. Assistant/Divisional Accountant Wildlife Kohat.
6. Mr. Sajid Sardar S/O Gul Sardar R/O H#64, Sector E-3, Phase-2, KDA Kohat.
7. Personal file.
8. Office Order file.

[Signature]
Divisional Forest Officer
Kohat Wildlife Division
Kohat

OFFICE ORDER NO. 53 /WL-KT, DATED KOHAT THE 9/12 /2018,
ISSUED BY MUHAMMAD ABD US SAMAD, DIVISIONAL FOREST OFFICER
KOHAT WILDLIFE DIVISION, KOHAT

B

12

The following newly appointed Wildlife Watchers are hereby posted as per following detail with immediate effect till further orders in the interest of public service.

S#	Name	Name of Area	Reporting / Immediate Officer
1	Mr. Wajahat Hussain	Usterzai Community Game Reserve	Sub-Divisional Wildlife Officer Kohat
2	Mr. Shahid Rehman	Borakka, Teen Talab, Jabbi	
3	Muhammad Ilyas	Dhoda Paya Game Reserve	
4	Mr. Muzafar Khan	Kamar Community Game Reserve	
5	Muhammad Waqas Khan	Jabbarh Game Reserve	
6	Syed Noman Ali Shah	Kohat City Beat /Area	
7	Muhammad Asif	Kohat City beat to Kohat University (Bannu Road)	
8	Mr. Hamid Khan	Kaghzai to Chakarkot Bala	
9	Mr. Khan Muhammad Gul	Tall City beat	
10	Mr. Tariq Hussain	Shinawarhi Game Reserve	
11	Mr. Abdul Samad	Doaba area /beat	
12	Mr. Ihsan Ullah	Hangu City area / beat and Bilyamin Game Reserve	
13	Mr. Asim Muhammad	Tanda Wildlife Park	
14	Mr. Sajid Sardar	Kotal Wildlife Park	In-Charge Raid Party
15	Mr. Khuram Shehzad	Divisional Raid Party	

No TA / DA and joining time is admissible.

(Muhammad Abd-us-Samad)
Divisional Forest Officer
Kohat Wildlife Division
Kohat

No. 1433-53 /WL (KT)

Copy forwarded to:

- 1- The Sub-Divisional Wildlife Officer Kohat.
- 2- The Range Officer Wildlife Tanda Range.
- 3- The In-Charge Divisional Raid Party Kohat Wildlife Division.

For information and further necessary action. They are directed to keep close vigilance on above mentioned officials and submit weekly report of their performance, No. of challans issued etc. and further submit recommendations for inefficient staff / lack of interest in duties assigned to them.

- 4- Concerned officials C/O SDWO/ROs
- 5- Assistant / Divisional Accountant.
- 6- Personnel files.
- 7- Office Order file.

Divisional Forest Officer
Kohat Wildlife Division
Kohat

OFFICE OF THE DIVISIONAL FOREST OFFICER, KOHAT WILDLIFE DIVISION,
KOHAT.

To

9

13

- 1- Mr. Arifullah D/R WL (I/C Range Officer Wildlife Tanda Range).
- 2- Mr. Naseer U Din D/R Wildlife Kotal Wildlife Park.
- 3- Mr. Ghulam Murtaza Wildlife watcher Kotal Wildlife Park.
- 4- Mr. Ikramullah Khan Wildlife watcher Kotal Wildlife Park.
- 5- Mr. Khurram Shehzad Wildlife watcher Kotal Wildlife Park.
- 6- Mr. Muhammad Yasir Wildlife watcher Kotal Wildlife Park.
- 7- Mr. Muhammad Sajid Wildlife watcher Kotal Wildlife Park.

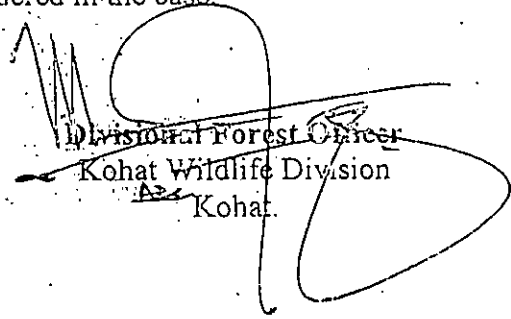
No. 2138 /WL - KT dated Kohat the 23/12/2019.

Subject CHARGE SHEET - MEMO OF ALLEGATION.

Memo:

The attached charge sheet - Memo of allegation regarding escape / missing animals in Kotal Wildlife Park is hereby served to you under E & D Rules 2011. You should submit proper response to the charges leveled against you directly to the Enquiry officer (Sub Divisional Wildlife Officer Kohat) within stipulated time otherwise it shall be presumed that you have nothing to put in for your defense and in that case ex-parte action would be considered in the case.

Encls as above.


Divisional Forest Officer
Kohat Wildlife Division
Kohat.

No. 1 /WL - KT

Copy forwarded to

- 1- The Conservator Wildlife Southern Circle Peshawar for information and necessary action. Please.
- 2- The Sub Divisional Wildlife Officer Kohat (Enquiry Officer) for information and necessary action. He is directed to complete the enquiry procedure within stipulated time and submit the same for further necessary action.

Divisional Forest Officer
Kohat Wildlife Division
Kohat.

(14)

CHARGE SHEET

I, Muhammad Abdu Samad, Divisional Forest Officer Wildlife Division Kohat, hereby charge you, Mr. Muhammad Sajid as follows:

1- That you, while posted as Wildlife watcher (BPS-07) at Kotal Wildlife Park, committed the following irregularities:

(a) Those according to the monthly reports the following animals have been reported upto 11/2019 in Kotal Wildlife Park.

S#	Name of animal spp	Male	Female	Total
1-	Chinkara	-	03	03
2-	Mouflan sheep	11	21	32
3-	Hog deer	05	03	08
Total		16	27	43

As reported by the Range Officer Wildlife vide his letter No. 108/TP dated 20/12/2019 the population of mouflan sheep have escaped or otherwise missing on grounds. The undersigned physically observed the same on 21/12/2019 during field visit to Kotal Wildlife Park. However, except above only ~~three~~ ^{four} Hog Deer are currently existed in the facility as:

01 Male 02 Female 01 Fawn = Total 04

(b) Keeping in view above situation you have committed injustice to assignment by originating huge loss to the department.

(c) It appears that you have not discharged duty fully devoted and proved yourself to be unproductive with lethargic presentation.

(d) The unpleasant occurrence of missing animals in the facility have neither reported nor informed by anyone on his part which directly reflected doubtful concert as well as discouraging commitment to the post. Rather the reported animals whatsoever in the past have otherwise now seems false & proxy meaning.

2- By reason of the above, you appear to be guilty of mis-conduct and inefficiency under rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.

3- You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the inquiry officer.

4- Your written defence, if any, should reach the inquiry officer within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.

Intimate whether you desire to be heard in person.


Divisional Forest Officer
Kohat Wildlife Division
Kohat

15

DISCIPLINARY ACTION

I, Muhammad Abdu Samad, Divisional Forest Officer Wildlife Division Kohat, as competent authority, am of the opinion that Mr. Muhammad Sajid designation Wildlife watcher (BPS-07) has rendered himself liable to be proceeded against, as he committed the following acts / omissions, within the meaning of rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS.

That he, while posted as Wildlife watcher (BPS-07) at Kotal Wildlife Park, committed the following irregularities:

- (a) Those according to the monthly reports the following animals have been reported upto 11/2019 in Kotal Wildlife Park.

S#	Name of animal spp	Male	Female	Total
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As reported by the Range Officer Wildlife vide his letter No. 108/TP dated 20/12/2019 the population of mouflan sheep have escaped or otherwise missing on grounds. The undersigned physically observed the same on 21/12/2019 during field visit to Kotal Wildlife Park. However, except above only ~~three~~ ^{few} Hog Deer are currently existed in the facility as:

01 Male 02 Female 01 Fawn = Total 04

- (b) Keeping in view above situation he has committed injustice to assignment by originating huge loss to the department.
- (c) It appears that he have not discharged duty fully devoted and proved himself to be unproductive with lethargic presentation.
- (d) The unpleasant occurrence of missing animals in the facility have neither reported nor informed by anyone on his part which directly reflected doubtful concert as well as discouraging commitment to the post. Rather the reported animals whatsoever in the past have otherwise now seems false & proxy meaning.
3. The inquiry officer shall, in accordance with the provisions of the ibid rules, provide reasonable opportunity of hearing to the accused, accord its findings and make, within thirty days of the receipt of this order, recommendations as to punishment or otherwise appropriate action against the accused.
4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer.


Divisional Forest Officer
Kohat Wildlife Division
Kohat

D

(16)

جناب ڈی۔ ایف۔ او۔ صاحب وائلڈ لائف ڈویژن کوہاٹ

عنوان :- چارج شیٹ

بحوالہ چھٹی نمبر 2138/WL-KT مورخہ 23-12-2019

جناب عالی!

میں ساجنو سردار نے مورخہ 04-12-2018 کو کوئل وائلڈ لائف پارک میں ڈیوٹی سنبھالی اور بحال اپنی ڈیوٹی فرض شناسی سے کوئل وائلڈ لائف پارک میں سرانجام دے رہا ہوں۔ اس دوران مجھے پارک میں موجود جانوروں کے بارے میں کوئی آگاہی نہیں دی گئی۔

اس ایک سال (1) ڈیوٹی کے دوران میں نے 5 آزاد جانور دیکھے جو پاڑہ ہرن ہیں اس کے علاوہ جنگلی سوروں کو وافر تعداد میں پایا۔

میں نے اس سال ترمیم دار جواب پیش خدمت ہیں۔

(1) مجھے ہڑیا لوں کے مطلق کچھ آگاہی نہیں کی گئی۔ بلکہ اس وسیع و عریض جنگل میں ریٹ ہاؤس، پرندوں کے لیے کچھ پنجرے بنے ہیں۔ دوسرے یا تیسرے دن گایا کی گاڑی کو مخصوص جگہ پر خالی کیا جاتا ہے۔ اور اس دوران سوائے مذکورہ بلا ہرن کے کوئی جانور نظر نہیں آیا جہاں تک ماہانہ رپورٹ 11/2019 کا تعلق ہے ایسی کوئی رپورٹ نہ ہم نے کسی کو دی اور نہ ہی ہم سے پوچھا گیا ہے۔ محسوس ہوتا ہے کہ ماہانہ رپورٹس صرف رجسٹر کا پیٹ بھرنے کیلئے دی جاتی رہی ہیں جن کا حقیقت سے کوئی تعلق نہیں۔

(2) مندرجہ بالا وضاحت سے واضح ہے کہ میرا اس سارے واقعے سے نہ کوئی تعلق ہے اور نہ ہی میری وجہ سے ڈیپارٹمنٹ کو نقصان پہنچا۔ اور نہ ہی ایسا کچھ میں سوچ سکتا ہوں۔

(3) میں نے اپنی ڈیوٹی فرض شناسی اور دلجوئی سے سرانجام دی ہے۔ اور کئی بار پرخطر اور دشوار پہاڑی راستوں کے صرف جنگلی حیات کے تحفظ کیلئے جال اور DFC کو اپنے ہاتھوں ٹھیک کیا

میری مندرجہ ذیل وضاحت قابل غور ہے۔

ریکارڈ کا بغور جائزہ لے کر بڑے افسوس سے کہنا پڑ رہا ہے کہ ماضی میں وقتاً فوقتاً یہ جانور فرار ہوئے رہے ہیں۔ ایک رپورٹ چھٹی نمبر 324 TP مورخہ 07-06-2018 کو این ایچ اے کی بلاسٹنگ کے فرار کی اطلاع افسران بالا کو دی گئی۔


(1) اسی طرح ایک رپورٹ 1876-WL-KT مورخہ 18-01-2019 سیریل نمبر 4 واضح طور پر افسران بالا کو جانوروں کے فرار کے متعلق آگاہ کیا گیا ہے۔

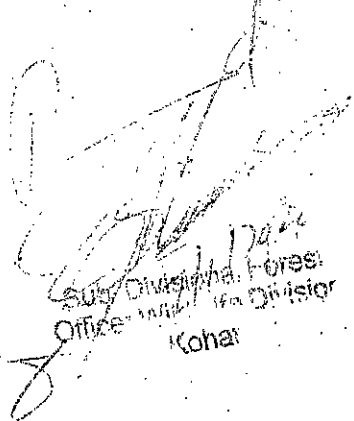
(2) مزید برآں چھٹی نمبر 80/WL-TP مورخہ 10-12-2015 کے رپورٹ کے مطابق ساٹھ (7) اڑیاں اپنی طبعی عمر پوری کرنے کو تھے اور کسی بھی وقت ان کی طبعی موت واقعہ ہوتی تھی۔

مرح ایکسپورٹ مورخہ 17-04-2018 کو بھی NHA بلاسٹنگ اور جانوروں کے فرار کی افسران بالا کو اطلاع دی گئی۔
 رجسٹرڈ مال الا وضاحت سے یہ بات واضح ہوتی ہے کہ اس سارے واقع سے میرا کوئی تعلق نہیں رہا اور نہ ہی کوئی قصور ہے اور اسی طرح کی
 پلچہ اور پورٹس بھی میری بے گناہی پر مہر ثابت کرتی ہیں۔
 درجہ بالا وجوہات کی بنا پر عرض ہے کہ میری چارج شیٹ داخل دفتر کی جاوے۔ تاکہ میں یکسوئی اور دلجوئی سے اپنا کام کر سکوں۔

ہم دعا گو رہے گے۔

شکریہ

العارض
 ساعد سردار



 Sub-Divisional Forest Officer
 Office of the Divisional Forest Officer
 Kohat

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از نظر تاریخ و سایر امور - اطلاع و اطلاع
در مورد تاریخ و سایر امور - اطلاع و اطلاع

۱۷۶۲۲ - تاریخ ۲۱/۱/۲۰۱۹

موضوع: ...
تاریخ: ...
محل: ...

این سند ...
تاریخ: ...
محل: ...

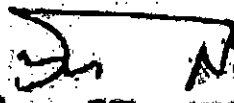
این سند ...
تاریخ: ...
محل: ...

3) یہ جانور سلاخوں 2018-4-17 تا 2018-4-18 کی تلاش کے بعد باہم نقلے ہیں کیونکہ سرین کا نام فقیر پورہ 4 سال بعد ہوا اس لیے جانور باہم نقلے اور اسے باہم نقلے ہیں

4) یہاں شکار نے وقت گزرتا رہا اور جانور کی پانچ ماہ آہستہ چھڑیوں اور پتھروں سے بہت زیادہ لگا رہا ہے اس لیے اسے جانور باہم نقلے۔

5) کیونکہ یہ جانور سرداری NHA کے سپر سہارا کی نشت اور ٹھیکہ دار جانور ہے اس لیے اسے 4 سال بعد سرین ہال اور گارڈ کی سرین کی کٹی اور اسے باہم نقلے جائے گا۔ یہاں سے باہم نقلے گئے ان کو باہم سلاخوں 2018-4-17 تا 2018-4-18 کی تلاش کے بعد باہم نقلے ہیں اس لیے اسے باہم نقلے اور اسے باہم نقلے ہیں

نیز یہ NHA 2018-10-13 کو سرین تلاش کی گئی ہے اس لیے جانور منتقلی سے اور NHA سے باہم نقلے جانے کے بعد باہم نقلے جانے اور جانوروں کو پھر اسے باہم نقلے جانے کے لیے جانور۔


Range Officer Wildlife
Tanda Wildlife Range
Hobal

21

**DETAIL COST ESTIMATE OF FENCE ERECTION AT WILDLIFE DIVISION KOHAT
(MRS-2017)**

1. **Excavation in foundation for building bridge etc complete (02-23-d)**
For DPC: 1(1460x1x0.5) = 730cft
For pits: 146(1x1.5) = 219
Total = 949cft
949cft = 26.87m³ @Rs.273.34/m³ = Rs.7,345/-
2. **Plain cement concrete including placing compacting finishing curing etc complete ratio 1:4:8 (06-05-i)**
For DPC: 1(1460x1x0.5) = 730cft
Deduction of pits: 146(1x1x0.5) = 73
Net total: 730 - 73 = 657cft
657cft = 18.60m³ @Rs.5481.08/m³ = Rs.1,01,971/-
3. **Plain cement concrete including placing compacting finishing curing etc complete ratio 1:2:4 (06-05-f)**
For DPC: 1(1460x1x1) = 1460cft
For pits: 146(1x1.5) = 219
Total = 1679cft
1679cft = 47.54m³ @Rs.7257.86/m³ = Rs.3,45,070/-
4. **Supply and fixing of steel girders size (4"x2"x10') (NSI)**
146Nos Rs.3000/each = Rs.4,38,000/-
5. **Provide & weave GI wire netting for wire crates 4"x4" mesh 10 SWG (19-13-c-02)**
Mesh: 1(1460x8) = 11680sft
11680sft = 1085.11m² @Rs.389.57/m² = Rs.4,22,725/-
6. **Stretching and fixing of mesh (NSI)**
Mesh: 1(1460x8) = 11680sft
11680sft = @Rs.15/sft = Rs.1,75,200/-
7. **Providing and fixing of tension wire on the top of fence (NSI)**
1460rft @Rs.10/rft = Rs.14,600/-
8. **Making of holes in GI girders (NSI)**
146 Nos @Rs.20/hole = Rs.2,920/-
Total cost estimate = Rs.15,07,831/-

Prepared by

Draftsman
Bannu Wildlife Division

خدمت عدا - 45 لا صاحب دائرہ لاف کوٹ دوتن

(22)

معرفت ریجسٹر آف سپر تازہ ریجسٹر کوٹ

عنوان: "بل ٹنٹ احوال حراچی"

جناب عالی

گزارش بجاتی ہے کہ اس سے پہلے بھی قول پولیٹیکل لاف

بارک میں بلا ٹنٹ ہوئی ہے جسکی رپورٹ ریجسٹر آف سپر تازہ

کو دی گئی ہے اور آج مورخہ 23⁰⁶/₂₀₁₈ بوقت شاہ 7:00pm

قول پولیٹیکل لاف بارک میں کھانا کھانے والے ڈاکٹر میں بلا ٹنٹ کی گئی

جو ٹنٹ رات تھی اور میں نے ریجسٹر آف سپر تازہ کو فون (مشاورت)

پر اطلاع دی کہ بلا ٹنٹ کا وجہ سے بارک میں کھانا کھانے والے

اور بارک کے حوال اور ٹنٹ کے ادھر ٹنٹ سے ہیں

اور حوال ٹنٹ کے محل بنا ہوا ہے اور مورخہ 23⁰⁶/₂₀₁₈ کو صبح

قول پٹاف اور ریڈارٹی وائے آئے اور جان ٹنٹ اور دیگر ٹنٹ کے

کے لئے تھے۔ تو وہاں جان ٹنٹ اور دیگر ٹنٹ کے لئے ہیں

اور جان ٹنٹ کے لئے ہیں اور میں سے پہلے

ہی جان ٹنٹ کے لئے تھے۔ اور میں سے پہلے

ہی جان ٹنٹ کے لئے تھے۔ اور میں سے پہلے

قول پولیٹیکل لاف خارج
23/6/2018

نو 324 TP Date 7-6-2018
forwarded to DFO wv Kohat
for n/aibm
Range Office, Muzaffargarh
Touche Wildlife

از دفتر دستم آفسر نازدہ والڈ لائف ریج کوئی

93

عنوان: قتل والڈ لائف پارک، گادڈر اور DPC
"Damage رپورٹ"

یہ کہ مور 04-04-17 بوقت شام 6 بجے قتل والڈ لائف پارک سے منسلک روڈ
جو کہ درہ آدم خیل پہلے جاتا ہے اس روڈ کو نشادہ کرنے کے لیے پیاروں لہر
Blasting کی گئی۔ پیاروں سے پتھر پھینکے گئے اور اس سے گادڈر 683
سے 725 تک تباہ حال اور D.P.C تباہ ہوئی جس کی تفصیل یہ ہے۔

1۔ گادڈر = 3 عدد تباہ ہوئے۔

2۔ اینٹل ریشن = 39 عدد مکمل تباہ ہوئے۔

3۔ حال = 4200 sqft مکمل تباہ ہوئے۔

4۔ DPC = 420 Rft مکمل تباہ ہوئے۔

5۔ درخت، پھلائی، سمیٹہ وغیرہ تقریباً 40 عدد درخت بھی متاثر ہوئے۔

لہذا یہ کارروائی تو مور 17/04 کو ہوئی روڈ کو نشادہ کرنے کے لیے مزید

مائنز بھی لگائی گئی ہیں جس سے اور نقصان ہونا ناختم ہے۔ اس روڈ تمام

کھلی اندام کے جائیں تاکہ مزید نقصان سے بچا جاسکے اور یہ بھی اندیشہ ہے

کہ کچھ جانور بھی نکل گئے ہوں جن کے لیے لقمہ بھی سردی درکار ہے۔

دیورائٹس اور سسٹم ال خدمت حاصل ہے۔

1۔ انجارج آغا نائل W/S

2۔ نسیم شاہ W/S

3۔ البرار اللہ W/S

4۔ قمبر شاہ W/S

office of the Range officer Munda wildlife Range

No 304

Dated 19/4/2018

24

To

The Divisional forest officer
Kotal wildlife division Kotal.

Subject: Damage Report.

As per reported by local staff of Kotal wildlife post, once again some planned blast have been carried out by NHA along roadside at top hills for extending access road leading to F.R Dorrna Adam Khel. Due to these blasts at top hills, heavy and large stones have been rolled down over fence which caused destruction. The following damages have been observed to the fence/Kotal wire fence on 18/4/2018 during evening hours.

- ① Angle iron poles 10 feet high = 58 no (Broken)
- ② Fence (chain link mesh) = 5800 sft (Broken)
- ③ DPC = 5800 Rft uprooted
- ④ Trees/shrubs = 20 no plucked

The undersigned has visited site on 19-4-2018 and observed a huge rift in the fence. It is predominant expectations that previous animals are likely to escape from the fence. As surveyed by the local staff on 19-4-2018 the following animals are found missing.

- ① 3 no children female
- ② 2 no mouflon sheep (female)
- ③ 1 no mouflon sheep (male)

(P.T.O)

از دفتر ریج آفیسر تاندرہ وائلڈ لائف ریج کوہاٹ

مورخہ 20/9/2019

نمبر 677P

بنام: نھیر الدین ڈی ریج کوہاٹ پارک
عنوان: اتنیہ انتہاء

یہ کہ جب سے زیر دستخطی نے چارج سنبھالا (تاندرہ ریج) تو اس سے پہلے ہی کوہاٹ وائلڈ لائف پارک کے جانوروں کی تعداد ریکارڈ سے کافی کم تھی جس کا آپ کو خوب علم تھا اور آپ نے زیر دستخطی کو یقین دلایا تھا کہ کوشش کریں گا کہ جانوروں کو کوہاٹ پارک فینس (جال) کے اندر لے آؤں مگر تا حال آپ ناکام رہے اور نہ ہی آپ نے کوئی مثبت پیش رفت کی۔ جس سے جانور پارک کے حدود میں واپس آسکیں۔

لہذا آپ کو دس (10) دن کی مزید مہلت دی جاتی ہے تاکہ آپ جانوروں کو پارک کے حدود میں واپس لے آئیں دیگر آپ کے خلاف مزید قانونی کارروائی عمل میں لائی جائے گی۔

M. Nadeem
Range Officer Wildlife
Tanda Wildlife Range
NC 114

No 687P

Copy forwarded to DFO WL Kohat for
information & action please.

o/c

M. Nadeem
Range Officer Wildlife
Tanda Wildlife Range
NC 114

F (26)

INQUIRY REPORT REGARDING ESCAPE / MISSING ANIMALS IN KOTAL WILDLIFE PARK CONDUCTED VIDE ORDER NO. 37 DATED 23/12/2019 ISSUED BY THE DIVISIONAL FOREST OFFICER, KOHAT WILDLIFE DIVISION, KOHAT.

Background.

While executing orders of the Chief Conservator Wildlife Khyber Pakhtunkhwa regarding trapping & shifting one Mouflan sheep from Kotal Wildlife Park to Peshawar Zoo has disclosed a foremost negligence on part of the local staff when no animal could see within the facility on one hand while on the other hand local staff of facility failed to report or inform the escape / missing animals from the facility. In this connection a written report of incharge Range Officer Wildlife vide his no. 108 dated 26/12/2019 (Annex-I) have testified negligence of local staff wherein clearly mentioned that during surveyed of animals in the facility, sufficient wild boars were roaming inside & outside the fence but no Mouflan sheep could see in the facility. Sustaining such position the concerned Deputy Ranger Wildlife / Wildlife watchers are on the otherwise performing duty of the concealed facts regarding negligence on their part. Knowing facts, field visit to the facility has also been considerably conducted by the Conservator Wildlife Southern Circle accompanied by the Divisional Forest Officer Wildlife Kohat on 21/12/2019 wherein found no Mouflan sheeps within the fence. Therefore, the incident left no option but to take negligence under E. & D Rules 2011 against staff who have been served with charges leveled against them vides No. 2138/WL-KT dated 23/12/2019. After serving the prescribed charge sheets to the individual staff I have been appointed as Enquiry Officer under rules 10 of Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011 to probe into the matter and submit justified findings in the case:

According to the file record provided to me following officials have been charged in the case:

- 1- Mr. Arifullah D/R Wildlife (Holding charge of a Range Officer Wildlife)
- 2- Mr. Naseer U Din Deputy Ranger Wildlife Kotal WL Park.
- 3- Mr. Ghulam Murtaza Wildlife watcher Kotal Wildlife Park.
- 4- Mr. Ikramullah Wildlife watcher Kotal Wildlife Park.
- 5- Mr. Khuram Shehzad Wildlife watcher Kotal Wildlife Park.
- 6- Mr. Muhammad Yasir Wildlife watcher Kotal Wildlife park.
- 7- Mr. Muhammad Sajid Wildlife watcher Kotal Wildlife Park.

27

The Detail of charges leveled against staff are re-produced below:

(a) Those according to the monthly reports the following animals have been reported upto 11/2019 in Kotal Wildlife Park.

S#	Name of animals spp	Male	Female	Total
1-	Chinkara	-	03	03
2-	Mouflan sheep	11	21	32
3-	Hog deer	05	03	08
	Total	16	27	43

As reported by you vide above cited letter the population of Mouflan sheep have escaped or otherwise missing on grounds. The undersigned physically observed the same on 21/12/2019 during field visit to Kotal Wildlife Park. However,, except above only four Hog deer are currently existed in the facility as:

01 Male 02 Female 01 Fawn = Total 04

- (b) Keeping in view above situation you have committed injustice to assignment by originating huge loss to the department.
- (c) It appears that you have not discharged duty fully devoted and proved yourself to be unproductive with lethargic presentation.
- (d) The unpleasant occurrence of missing animals in the facility have neither reported nor informed by anyone on his part which directly reflected doubtful concert as well as discouraging commitment to the post. Rather the reported animals whatsoever in the past have otherwise now seems false and proxy meaning.

The Charges are alike except the following additional charge leveled against Mr. Naseer U Din Deputy Ranger Wildlife as:

- (e) The unpleasant occurrence of missing animals in the facility have neither reported nor informed by anyone on his part which directly reflected doubtful concert as well as discouraging commitment to the post. Rather the reported animals whatsoever in the past have otherwise now seems false and proxy meaning. In addition you have regularly verified the monthly progress reports before signature of the and dispatch the same by Range Officer Wildlife Tanda / Kotal appeared huge question mark to your negligence?

The monthly progress report upto 11/2019 duly verified by the Range Officer Wildlife Mr. Naseer U Din and signed / dispatch by the Range Officer Wildlife. Total highlights availability of following animals.

S#	Name of animals species	Closing balance			Total
		M	F	Fawn	
1	Chinkara	-	03	-	03
2	Moufflon Sheep	11	21	-	32
3	Hog deer	05	03	-	08
Total		16	27	-	43

If reviewed, it can be determined that escape / missing occurrence during 12/2019 meant that the negligence taken place not very far back. This incident has been appeared very shortly. The unpredictable loss of 29 animals has been made correctively revival setting aside case enquiry.

Procedure

- (i) After examined available record the undersigned in capacity as enquiry officer did a spot visit of the facility on 25/11/2019. Held meeting with the local staff and searched entire facility from one location to another but observed no Moufflon sheeps. Besides, the fence was also checked and found some vulnerable points but all the gates were temporarily closed by the local staff. Yet according to my observation about 10 points were at the status of easy and convenient repair / closure but the local staff merely tried to fix rifts by putting loose stones and shrubs etc. If the vulnerable points whatsoever observed would have been properly repaired under the already incurred expenditure out of the project funds the situation would certainly be have appeared to otherwise. According to verbal statement of local staff it was told that a huge population of wild bear & other predators manage entry into the fence. The wild bear is a digging-proficient abundantly found in the entire region. The local staff further expressed that major aspect of escape / missing animals is the damage to fence and DPC caused by the wild boars. The species a prolific breeder constantly increased population may need to eradicate by adopting proper and effective planning. Photographs attached (Annex-II).

During 2nd step examined the available record of animals and other birds and found no entry / observation of escape / missing animals in the relevant register. (Annex- III)

(iii) The 3rd step is the record of supplementary feed to animals. During inspection of register, it has been observed that the register contained feed consumption upto the month of January 2020 (Annex- IV) arising question mark?

Being much responsible assignments of Range Officer Wildlife and Deputy Ranger Wildlife of the facility it has been considered important to include the justifications / replies of both officials in the report and with significant observations given at the end of each one:

Item-wise reply to the charge sheet furnished by Mr. Arifullah I/C Range Officer

Wildlife

- (a) Since taken over charge of Tanda Wildlife Range on 25/10/2019, it is correct that monthly progress report of animals has been submitted regularly and it has been verified from Deputy Ranger Wildlife (In charge Kotal Wildlife Park).
- (b) It is incorrect I was posted as Range Officer of Tanda / Kotal Wildlife and I have adopted proper SOPs for both of the parks where in charge of each park was nominated and it was solely prime responsibility of the nominated in charge.
- (c) It is incorrect as I have taken over the charge as Range Officer, I have done all the efforts for betterment of the parks and ensured round the clock presence of staff, regularly checked all record getting satisfactory feedback / report from the incharge and staff.
- (d) Since taken over charge of Kotal Wildlife Park on 25/10/2019. I remained under regular effort in capturing one female Mouflan sheep for onward shifting to Peshawar Zoo with regard to compliance of instructions by the Divisional Forest Officer Wildlife Kohat vide endorsement No, 891/WL (KT) dated 23/10/2019. I supervised the task round the clock and stressed upon local staff to accomplish the task as early as possible. Meanwhile I personally observed that some animals have been escaped wherein putting my efforts I succeeded to brought back five female Mouflan in the fence. Eventually lapse of three

weeks it has learnt through local staff that the animals in question are missing or otherwise escaped from fence. Knowing fact, I have submitted report (as annex-I mentioned above) to the Divisional Forest Officer Wildlife Division Kohat.

At the end he has mentioned that being newly incumbent to the post I am unaware of the facts as from when the animals are missing. I have neither informed nor reported fact by any of the subordinate staff till my arrival to the facility. In this situation I am not defaulter of the incident rather request that I may kindly be expunged from the charges leveled against me by virtue of my assignment.

Considerable observations on reply of Mr. Arifullah I/C Range Officer W/Life

i- In his reply to the charge sheet at (b) no observed SOPs putting sole responsibility on incharge Deputy Ranger Wildlife Kotal alone is well questionable. Overall default on shoulders of Deputy Ranger Wildlife in the case creates ambiguity because being competent skill of a Range Officer Wildlife, why achievable strategy for search and siege animals could not be streamline to his own extent, showing lack of involvement in the field duty on his part.

ii- In his reply to the charge sheet at (c) the record of animals has been maintained but on the spot no animal was found is contradictory between the record and feedback of / report of local staff speaking that the control has been merely carried out in the documents and that the Range Officer Wildlife has no care of his responsibility to observe and check the animals in the field is lacking his interest.

iii- In his reply to the charge sheet at (d) highlighting inefficiency as the period of his charge 25/10/2019 till reported 20/12/2019 i.e., lapse 01 month and 15 days. In this period the full fledged incharge of the facility admitted that he was unaware of the actual population of animals in the park is otherwise unreasonable

Item-wise reply to the charge sheet furnished by Mr. Naseer U Din D/Ranger Wildlife

(a) Mentioned that due to the extension activities of access road the NHA authorities carried out blasting for breaking mountains at upper sides during previous year. Due to

30

the activities the large stones rolled down caused major damages to the fence. It created rifts for convenient escape chances to the animals. The rehabilitation of all such damages although agreed between the department and local contractor / NHA yet the work was started very late almost after lapse of 4 months. Besides he also pointed out large number of wild boar, jackal within and around the facility causing damage to the fence and DPC provided convenient escape chances to the animals. He admitted that that major cause is the damages so appeared by the above mentioned work.

- (b) In his reply it has been mentioned that during the entire service he has not been charged with such allegation it is otherwise his mis-fortune of the instant case where he has performed fully devoted. He also disclosed that in the past many animals were escaped but came back / brought to the fence.
- (c) Commented his performance at many stations and raid during his service where the challans lodged against violation is the evident of efficiency.
- (d) Declared escape of large animals which have been reported.
- (e) Pointed out that the survey of animals are recorded on estimated figure. He further added his performance can be asked from local staff on oath.

Considerable observations on reply of by Mr. Naseer U Din D/Ranger Wildlife

- (a) The N.H.A activities were carried out before one or more years back while the animals have been escaped / missing from 12/2019 and also maintained the same in monthly progress reports duly verified by Mr. Naseer U Din DR WL is the fact that the animals swerve available up to 11/2019.
- (b) Mentioned that in the past many animals were escaped but came back / brought to the fence. He further mentioned that either within or outside fence the animals are the property of department or we are responsible for protection. It is not a reliable defense on his part.
- (c) No comments.
- (d) Admitted escape /-missing in large animals from fence. However, on examining the monthly progress report of the facility (available on record) bearing his verification of availability of the animals. It also inclined questionable?
- (e) Delivered regular instructions for protection of fence to the staff could not be carried on by the Incharge Deputy Ranger as well as other staff.

(31)

Detail of Wildlife watchers posted at Kotal Wildlife Park are mentioned below:

S#	Name	1 st appointment	Posting in the facility
1-	Mr. Ghulam Murtaza	7-5-2013	Not posted in the facility but deals the official correspondence under direct supervision of Range Officer Wildlife at Kotal WL Park.
1-	Mr. Ikramullah Khan	1-1-2019	5/9/2019
2-	Mr. Khursu Shehzad	8-10-2018	2/5/2019
3-	Mr. Muhammad Yasir	3-6-2017	20/8/2019
4-	Mr. Muhammad Sajid	9-10-2018	4/12/2018

In the statement of Mr. Ghulam Murtaza Wildlife watcher he produced copies of posting orders from 25/7/2016 to 2/10/2017. In these posting orders he has not been posted in Kotal Wildlife Park. Further he mentioned that during the month of June he was assigned special task by the Range Officer Wildlife to supervise and maintain official record of the activities carried out under the project "Green Pakistan" in Kotal Wildlife Park. Mr. Ghulam Murtaza denied direct relationship with the responsibilities of protection of fence and animals in the facility. Rather currently he is posted in Tanda Wildlife Range.

Personal Hearing

Up held enquiry sequence by providing optional opportunity of personal hearing to the accused on 24/2/2020 wherein no one could provide sufficient / documentary proof for his self-defense. The main questions of escape / missing animals and maintaining fake record could not be justified for consideration to satisfy the enquiry.

Findings

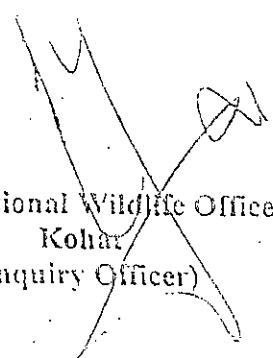
According to above precise story, following reasonable findings are likely to be appeared for further consideration:

- The allegations found logical in the charge sheets served to the accused wherein it has been testified by all sources as well as by the competent authority i.e, Divisional Forest Officer Wildlife Kohat and the higher authority of honorable Conservator Wildlife Southern Circle by making spot visit to the facility. At presently the allegation of escape / missing mouflan sheep is deemed correct.
- Reply / justification submitted by the accused are not covered for their sufficient defense.

32

According to above precise story, following reasonable findings are likely to be appeared for further consideration:

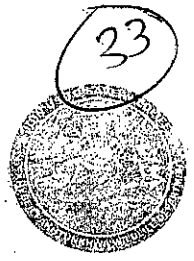
- The allegations found logical in the charge sheets served to the accused wherein it has been testified by all sources as well as by the competent authority i.e, Divisional Forest Officer Wildlife Kohat and the higher authority of honorable Conservator Wildlife Southern Circle by making spot visit to the facility. At presently the allegation of escape / missing Mouflan sheeps is deemed correct.
- Reply / justification submitted by the accused are not covered for their sufficient defense:
- According to the spot visit the damages in fence have been seen where the same were not properly repaired by local staff.
- Negligence of staff and incharge of facility rendered huge loss to government / department inclined compensation / recovery of failure on part of the accused.
- No daily observation, monthly diary could produce by the Incharge Range Officer Wildlife and Deputy Ranger Wildlife and other accused to appraise their performance where it is evident that the duty on their part was not conducted properly.
- All involved staff itself admitted non-availability of mouflan sheeps in the facility in question at one side while on the other side each official determined his duty with fully devoted is beyond logical? If the facility has been properly protected than what measures were not taken to protect and report the factual position of the facility till 11/2019.
- The loss to Government has been occurred due to inordinate negligence in-efficiency and lack of interest by the local staff.


Sub Divisional Wildlife Officer
Kohat
(Enquiry Officer)



OFFICE OF THE DIVISIONAL FOREST OFFICER
KOHAT WILDLIFE DIVISION, KOHAT

Phone: 0922-514393
Email: dfokohat@gmail.com
Address: H#05, Sector D-II, Phase-II, KDA



To

Mr. Muhammad Sajid
Wildlife Watcher
Kohat Wildlife Division

No. 2564 /WL (KT)

Dated Kohat the 02/06 /2020.

Subject: - **SHOW CAUSE NOTICE**

Memo:

The Show Cause Notice (in duplicate) duly signed by the undersigned is enclosed herewith for necessary action and reply accordingly.

Please acknowledge receipt.

Encls: as above:


Divisional Forest Officer
Kohat Wildlife Division
Kohat

34

SHOW CAUSE NOTICE

I Muhammad Abd-us-Samad, Divisional Forest Officer, Kohat Wildlife Division, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules-2011 do hereby serve you Mr. Muhammad Sajid Wildlife Watcher at Kotal Wildlife Park as follow.

- i. Due to your negligence, the animals were escaped from Kotal Wildlife Park and you being responsible of the Park have not reported the same while the animals were shown available in the monthly progress reports submitted to this office regularly.
- ii. That consequent upon the completion of enquiry conducted against you by the Enquiry Officer / Enquiry Committee for which you were given opportunity of hearing, and
- iii. On-going through the findings of the Enquiry Officer / Enquiry committee, the material on record and other connected papers including your defense before the Enquiry Officer / Enquiry committee.

I am satisfied that you have committed the following acts/omissions specified in rule-3 of the said rules:

- a. In-efficiency

As a result thereof, I, as competent authority, have tentatively decided to impose upon you following penalties under rule-14 (4)(b) of the rules ibid.

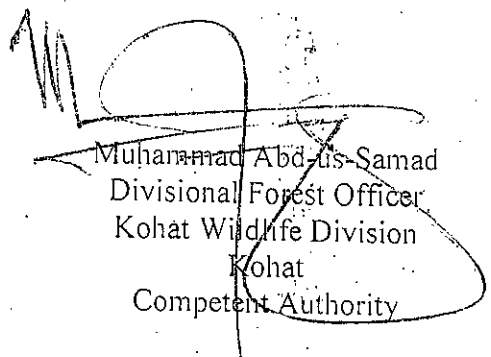
- 1. **Stoppage of two consecutive increments**
- 2. **Recovery of Rs.87000/- (Rupees Eighty seven thousands only)**

You are, therefore required to Show Cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply to this notice is received within seven days of its receipt by you. It shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.

A copy of findings of the Enquiry Officer / Enquiry Committee is enclosed.

Encl: As above:


Muhammad Abd-us-Samad
Divisional Forest Officer
Kohat Wildlife Division
Kohat
Competent Authority

بخدمت جناب ڈی۔ ایف۔ او صاحب وائلڈ لائف ڈویژن کوہاٹ

ریفرنس لیٹر نمبر (KT) 2565/WL

عنوان: درخواست بمراد شوکار نوٹس

جناب عالی

مودبانہ گزارش ہے کہ تا کردہ گناہ کا جو ملہ ہم پر ڈالا گیا ہے یہ سراسر نا انصافی ہے۔ میں ایک غریب بندہ ہوں جو جرمانے اور سزا کا بوجھ برداشت نہیں کر سکتا۔

سائل اپنے حق میں مندرجہ ذیل عرض کرتا ہے۔

1. میں مورخہ 2018-12-04 کو تل وائلڈ لائف پارک میں تعینات ہوا اس دوران مجھے اڑیال یاد دیگر جانوروں کے مطلق کچھ آگاہی نہیں دی گئی۔

2. میں نے کہیں بھی کسی نلاہلی اور کوتاہی کا مظاہرہ نہیں کیا بلکہ پورا افسانہ حسن طریقے سے انجام دیا اور ساتھ ساتھ جانوروں کی دیکھا۔

3. آفس ریکارڈ سے یہ بات واضح ہے کہ جانور میرے چارج سنبھالنے سے بہت پہلے پارک سے فرار ہو چکے تھے اور کچھ جانور اپنی طبعی عمر پوری کر چکے تھے۔

4. دوران ڈیوٹی مجھے ڈیلی آبزرویشن رجسٹر اور ماہانہ پراگریس رپورٹ کے مطابق کوئی آگاہی نہیں دی گئی اور تاہی میں نے کسی ایسی رپورٹ کی تصدیق کی ہے۔

انصاف سے اصول کی تکمیل ہوتی ہے اور انصاف ہر لحاظ سے نا انصافی سے بہتر ہے۔

لہذا میری پرزور گزارش ہے کہ سائل کو جرمانے اور سزا سے بچا کر انصاف فراہم کیا جائے۔

شکریہ

انصاف کا طلب گار

ساجد سردار، وائلڈ لائف واچر

مورخہ 12-6-2020

OFFICE ORDER NO. 64 DATED 19/06 2020,
ISSUED BY MR. MUHAMMAD ABDUS SAMAD DIVISIONAL FOREST OFFICER, KOHAT
WILDLIFE DIVISION, KOHAT

36

Brief history of the case:

In compliance of verbal Order of the Chief Conservator Wildlife Khyber Pakhtunkhwa regarding trapping and shifting of one Mouflan Sheep from Kotal Wildlife Park to Peshawar Zoo. On searching of animals for trapping, it was disclosed that no animals were available at Kotal Wildlife Park. The concerned Range Officer Wildlife and his staff of the park has regularly submitted monthly reports whereby shown availability of animals in the facility. It is the negligence of concerned staff that they were not aware of the actual position of the animals. The undersigned being competent authority has appointed Mr. Shabir Ahmad Sub-Divisional Wildlife Officer Kohat as Enquiry Officer to probe in the matter and submit report in this regard vide this office Order No.37, dated 23/12/2019.

Proceeding of the Enquiry:

In compliance, Mr. Shabir Ahmad SDWO Kohat (Enquiry Officer) has started the proceeding, issued charge sheet and memo of allegation duly signed by the competent authority and found that it was the negligence of the following staff of Kotal Wildlife Park that they were unaware of the factual position of the Park resulted escaped of 29 Mouflan sheep.

1. Mr. Arifullah Deputy Ranger Wildlife (holding charge of Range Officer Wildlife)
2. Mr. Naseer-ud-Din Deputy Ranger Wildlife
3. Mr. Ghulam Murtaza Wildlife Watcher
4. Mr. Ikramullah Wildlife Watcher
5. Mr. Khuran Shehzad Wildlife Watcher
6. Mr. Muhammad Yasir Wildlife Watcher
7. Mr. Muhammad Sajid Wildlife Watcher

The Enquiry Officer has furnished his findings vide letter No.384/SDWO dated 25/04/2020 whereby found guilty all the above staff due to their negligence.

The undersigned issued show cause notice to all the accused staff and provided opportunity of personal hearing on 19-06-2020. They have also submitted their written reply to the show cause notice but not convincing.

Conclusion:

The accused officials failed to provide any evidence in their defence to deny the charges and I convinced that the accused is guilty in inefficiency in performance of official duty of the park due to their negligence and escaped of Twenty nine (29) Mouflan sheep animals from Kotal Wildlife Park, therefore, the undersigned being competent authority imposed the following minor penalties as per rule 4 of Efficiency and Discipline Rules 2011 upon the concerned below accused:

S#	Name	Particular of penalty
1	Mr. Arifullah Deputy Ranger Wildlife (held charge of Range Officer Wildlife)	i. Stoppage of one increments for one year ii. Recovery of Rs.217500/-
2	Mr. Naseer-ud-Din Deputy Ranger Wildlife	i. Stoppage of one increment for one year ii. Recovery of Rs.217500/-
3	Mr. Ghulam Murtaza Wildlife Watcher	i. Stoppage of two increments for two years ii. Recovery of Rs.87000/-
4	Mr. Ikramullah Wildlife Watcher	i. Stoppage of two increments for two years ii. Recovery of Rs.87000/-
5	Mr. Khuran Shehzad Wildlife Watcher	i. Stoppage of two increments for two years ii. Recovery of Rs.87000/-
6	Mr. Muhammad Yasir Wildlife Watcher	i. Stoppage of two increments for two years ii. Recovery of Rs.87000/-
7	Mr. Muhammad Sajid Wildlife Watcher	i. Stoppage of two increments for two years ii. Recovery of Rs.87000/-

SD/-

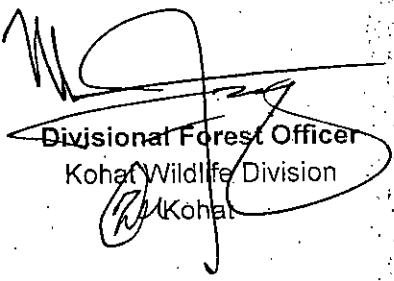
(MUHAMMAD ABDUS SAMAD)
Divisional Forest Officer
Kohat Wildlife Division
Kohat

No. 708-12AWL (KT)

37

Copy forwarded for information and necessary action to the:-

1. Chief Conservator Wildlife Khyber Pakhtunkhwa please.
2. Conservator Wildlife Southern Circle, Peshawar please.
3. Sub Divisional Wildlife Officer Kohat.
4. Range Officer Wildlife Tanda.
5. Assistant / Divisional Accountant Wildlife Kohat.
6. All concerned.
7. Personal files concerned.
8. Office Order file.


Divisional Forest Officer
Kohat Wildlife Division
Kohat

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OFFICE ORDER NO. 146 DATED PESHAWAR THE 13/04/2021

BY DOCTOR MOHSIN FAROOQUE, CHIEF CONSERVATOR WILDLIFE KHYBER PAKHTUNKHWA PESHAWAR

As per monthly report of Kotal Wildlife Park for the month of 11/2019 the following animals have been reported in the Park.

552
DATE _____
FILE _____
DPO WILDLIFE KOHAT

Sr#	Name of Animal	Male	Female	Total
1.	Chinkara	-	03	03
2.	Mouflan Sheep	11	21	32
3.	Hog Deer	05	03	08
	Total	16	27	43

While tripping and shifting of one Mouflan Sheep from Kohat Wildlife Park Kohat to Peshawar Zoo in compliance to the directives of the Chief Conservator Khyber Pakhtunkhwa Peshawar no mouflan sheep was observed in the park as evident from the report of Range Officer Wildlife Tande Range Kohat vide Letter No. 108/TP, dated 20-12-2019. Moreover, Conservator Wildlife Southern Circle Peshawar accompanied by Divisional Forest Officer Wildlife Kohat during field visit to the Park on 21-12-2019 also did not observe mouflan sheep within the park. Accordingly Divisional Forest Officer Wildlife Kohat served charge sheets against the following concerned staff vide letter No. 2138/WL-KT dated 23-12-2019 and Mr. Shabir Ahmad Sub-Divisional Officer Kohat was appointed as inquiry officer vide office order No. 37, dated 23-12-2019.

Sr#	Name	Designation
1.	Mr. Arif Ullah	Deputy Ranger Wildlife of Range Officer Wildlife
2.	Mr. Nascerr Ud Din	Deputy Ranger Wildlife
3.	Mr. Ghulam Mustafa	Wildlife Watcher
4.	Mr. Ikram Ullah	Wildlife Watcher
5.	Mr. Khurram Shehzad	Wildlife Watcher
6.	Mr. Muhammad Yasir	Wildlife Watcher
7.	Mr. Muhammad Iqbal	Wildlife Watcher

In compliance to the above, the inquiry officer submitted his inquiry report vide letter No. 384/SDWO dated 24/04/2020 with the following findings.

1.	The allegation found logical in the charge sheet to the accused wherein it has been testified by all sources as well as by the competent authority i.e Divisional Forest Officer Wildlife Kohat and the higher authority of honorable Conservator Wildlife Southern Circle by making spot visit to the facility. At presently the allegation of escape/missing Mouflan Sheep is deemed correct.
2.	Reply/justification submitted by the accused are not covered for their sufficient defense.
3.	According to the spot visit the damages in fence have been where the same were not properly by local staff.
4.	Negligence of staff and incharge of facility rendered huge loss a Government Departmental companion/ recovery of failure on part of the accused.
5.	No daily observation monthly diary could produce by the Incharge Range Officer Wildlife and other accused to appraise their performance where it is evident that the duty on their part was not conducted properly.
6.	All involved staff itself admitted non-availability of mouflan sheeps in the facility in question at one side while on the other side each official determined his duty with full devoted is beyond logical. If the facility has been properly protection then what measures were not taken to protect and report the factual position of the facility till.
7.	The loss of Government has been occurred due to inordinate negligence b the local staff.

Based on the above exposition the DFO Wildlife Kohat vide his office order No. 04 dated 19/06/2020 imposed the following minor penalties upon the accused as per Rules-4 of E&D Rules 2014.

Sr#	Name	Particular of penalty
1.	Mr. Arif Ullah	i. Stoppage of one increment for one year ii. Recovery of Rs. 217500/-
2.	Mr. Nascerrud-Din	i. Stoppage of one increment of one year ii. Recovery of Rs. 217500/-
3.	Mr. Ghulam Mustafa	i. Stoppage of two year increment for two year ii. Recovery of 87,000
4.	Mr. Ikramullah	i. Stoppage of two year increment for two year ii. Recovery of 87,000
5.	Mr. Khurram Yasir	i. Stoppage of two year increment for two year ii. Recovery of 87,000
6.	Mr. Muhammad Yasir	i. Stoppage of two year increment for two year ii. Recovery of 87,000

Therefore based on the above, the undersigned being competent authority in the case by exercising the powers under Rules-4(1) (a)(ii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 has decided to consider the reduced penalty 50% of the value of property besides withholding the proposed increments as recommended by the de-novo enquiry committee and impose the penalty with stoppage of annual increment as per following detail in the interest of public with immediate effect:

Name	Total value of property proposed (Rs.)	Penalty proposed by the enquiry committee		Penalty imposed by the competent authority		Remarks
		Amount of 50% recovery	Withholding of Increments	Amount of Recovery	Withholding of Increments	
Mr. Arifullah	296,250	148,125	Censure	100,000	Censure	Tenure of the official was just one month
Mr. Naseerud-Din	1,777,500	888,750	Three increments without cumulative effect	888,750	Censure	
Mr. Muhammad Naseer	296,250	148,125	Censure	148,125	Censure	
Mr. Ghulam Murtaza	592,500	296,250	Censure		Censure	The official had been deputed in raid party & also engaged in supervision of activities of 10 BTTP Project
Mr. Ikramullah	592,500	296,250	Three increments without cumulative effect	296,250	Three increments for three years	
Mr. Khurram Shahzad	592,500	296,250	Three increments without cumulative effect	296,250	Three increments for three years	
Mr. Muhammad Yasir	592,500	296,250	Three increments without cumulative effect	296,250	Three increments for three years	
Mr. Sajid Sardar	1,185,000	592,500	Three increments without cumulative effect	592,500	Three increments for three years	
Total amount Rs	5,925,000	2,962,500		2,618,125		

Moreover the incumbent DFO Wildlife Kohat is censured to be careful in future. He should also ensure to bring back maximum number of animals which are now outside of the park boundaries. He has to complete the task within three months otherwise disciplinary action under the relevant rules can be initiated against him.

(Dr. Mohsin Farooque)
Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

No. 7806-09
AWL(E)

Copy forwarded for information and necessary action to the:

1. Conservator Wildlife Central Circle Peshawar
2. Conservator Wildlife Southern Circle Bannu
3. Divisional Forest Officer Wildlife-Kohat
4. Officer/Officials concerned.

They are directed to start the requisite recovery immediately and ensure to complete the recovery within a period of three months positively and report compliance.

Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

No. 1381-88 /WL-KT

dated Kohat the 21/04 2021

Copy forwarded to:-

- 1- Mr. Arifullah Deputy Ranger Wildlife
 - 2- Mr. Muhammad Naseer Ex-Range Officer Wildlife.
 - 3- Naseer ud Din Ex-Deputy Ranger.
 - 4- Ghulam Murtaza Wildlife Watcher
 - 5- Ikramullah Wildlife Watcher.
 - 6- Mr. Khurram Shahzad Wildlife Watcher
 - 7- Muhammad Yasir Wildlife Watcher
 - 8- Sajid Sardar Wildlife watcher.
- For information and necessary action.

Divisional Forest Officer
Kohat Wildlife Division
Kohat

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جناب سیکرٹری صاحب انوار منٹ فارٹی ایڈوانسڈ وائلڈ لائف خیبر پختونخواہ

عنوان : اپیل برخلاف سزا کنزیوٹو اور وائلڈ لائف خیبر پختونخواہ

جناب عالی!

سائل درج ذیل عرض کرتا ہے۔

۱۔ یہ سائل 08-10-2018 کو وائلڈ لائف میں بھرتی ہوا تھا۔

۲۔ مجھے دفتر سے کوئل وائلڈ لائف پارک 04-12-2018 ٹرانسفر کیا گیا۔

۳۔ آپ صاحبان کی تحریر کے مطابق NHA کی بلاسٹنگ مورچہ 03-06-2018

اور 04-06-2018 کو ہو چکی تھیں۔ سب نقصان ان دونوں میں ہو چکا ہے۔ اور جال

4 مہینے زمین پر پڑا رہا۔ اور سارے جانور نکل گئے۔ نیز اس دوران ہم بھرتی نہیں تھے۔

۴۔ ہم نے ماہانہ پرائرس رپورٹ پر کبھی دستخط نہیں کئے ہیں۔ اور نہ ہی ہم نے جانوروں کی مطلوبہ

تقداریں تصدیق کی تھی۔

درج بالا تحریر میں مکمل لکھا گیا ہے کہ جانور اپنے جال سے باہر چلے گئے ہیں اور تاحال واپس نہیں آئیں ہیں۔

درج بالا تحریر پر انٹس ہے کہ ہم لوگ بے گناہ ہیں اور نہ ہی ہمارا کوئی قصور ہے۔ برائے مہربانی کاغذات کی پڑتال

کی جا کر مناسب احکامات جاری کیے جائیں۔ اور ہمیں انصاف دیا جائے۔

اعراض

آپ کا تابعدار وائلڈ لائف واپس

سماں سکرٹری

مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن

27/12/2018

مذکورہ ذیل:

مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
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مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن

التعارف

NO 159 WHTP

Date: 12/12/2018

forwarded to AFO for action please.

Range Officer Wildlife
Tanda Wildlife Range
Kohat

- 1. مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
- 2. مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
- 3. مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن
- 4. مختار احمد صاحب ڈیپوٹ ڈائریکٹر ایمر ایڈمنسٹریشن

VAKALAT NAMA

NO. _____/20

IN THE COURT OF KP SERVICE TRIBUNAL PESHAWAR.

Sajid Sardar (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Wildlife Department etc. (Respondent)
(Defendant)

I/We, Sajid Sardar

Do hereby appoint and constitute ***M. Asif Yousafzai, Advocate Supreme Court Peshawar,*** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

Sajid
(CLIENT)

ACCEPTED

M. ASIF YOUSAFZAI
M. Asif Yousafzai
Advocate Supreme Court Peshawar.

&
TAIMUR ALI KHAN
Advocate High Court, Peshawar

& SYED NOMAN ALI BUKHARI
Syed Noman Ali Bukhari
Advocate High Court

& SHAHKAR KHAN YOUSAFZAI
S. Khan
Advocate.

OFFICE:

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