BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal-No. 912/2013

Date of Institution ... 20.05.2013

Date of Decision ... 27.02.2019

- Parvez Khan, Deputy Public Prosecutor, Swabi, R/o Village Kalu Khan District Swabi. ... (Appellant)

VERSUS

The Govt: of Khyber Pakhtunkhwa through the Chief Secretary, Province of Khyber Pakhtunkhwa, Peshawar and four others. (Respondents)

MR. TAIMUR ALI KHAN, Advocate

MR. M. RIAZ KHAN PAINDAKHEL Assistant Advocate General

MR. AHMAD HASSAN, MR. HAMID FAROOQ DURRANI For respondents.

For appellant.

MEMBER(Executive) CHAIRMAN

JUDGMENT

AHMAD HASSAN, MEMBER.- Arguments of the learned counsel for the parties heard and record perused.

ARGUMENTS

2. Learned counsel for the appellant argued that he was appointed Prosecuting S.I (BPS-11) in the Police Department on 13.05.1988. He got promoted to the post of PDSP (BPS-17) in 2002. Resultantly, the appellant alongwith others employees of the Prosecution Branch were transferred to the Law Department and thereafter to the Home Department in the year 2003. That the post of the appellant was redesignated as District Public Prosecutor vide order dated 27.09.2004. From time to time the appellant approached the respondents for grant of promotion to BPS-17. On reaching the age of superannuation he stood retired from government service on 31.03.2013. Learned counsel for the appellant further prayed that the appellant may be considered for promotion to the post of Public Prosecution (BPS-18).

3. On the other hand learned Assistant Advocate General argued that after promulgation of Police Order 2002 and Devolution of Power Plan 2001 Prosecution Branch of the Police Department was abolished and the employees of Legal Branch alongwith their posts were initially transferred to the Law Department and thereafter to the erstwhile Home and Tribal Affairs Department. His services were regulated under the Khyber Pakhtunkhwa Prosecutors and Government Pleaders Appointment Rules 1978. Though the post of DPP was in BPS-17, as per K-hyber Pakhtunkhwa Prosecutor Service Rules 2005 but the appellant upon transfer to Home Department was in BPS-16 and thereafter his post was re-designated as Assistant Public Prosecutor (BPS-16). Case of the appellant and other eligible officers was placed before the DPC for promotion from BPS-16 to BPS-17 and was notified vide order dated 27.02.2012. Plea of the appellant is not based on facts as only those officers, who fulfilled the criteria laid down in the Khyber Pakhtunkhwa Prosecution Rules 2005 were considered for promotion to the higher post.

CONCLUSION

4. It is an admitted fact that the appellant stood retired from government service on 31.03.2013. His plea relates to grant of promotion to BPS-17 from the date his juniors were granted promotion and grant of promotion to BPS-18 on compassionate grounds. However, in support of his prayer, learned counsel for the

2

appellant has not been able to produce any single document through which his claim can be established. Entire appeal of the appellant is silent as to what was his initial seniority position and how many juniors were promoted by ignoring the appellant. In the absence of any documentary evidence/connected papers, it appears that claim of the appellant is not genuine. He finally got promotion to BPS-17 on 27.02.2012. Learned counsel for the appellant was also not able to highlight the similarity between the case of the appellant and precedents quoted in the service appeal. Did he file any appeal against the demotion order and what was its outcome. However, the available record was completely silent and it can be presumed that he slept over his rights.

5. As a sequel to above, the appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

(AHMAD HASSAN) MEMBER

(HAMID FAROOQ DURRANI) CHAIRMAN

ANNOUNCED 27.02.2019

25.01.2019

Learned counsel for the appellant and Mr. Usman Ghani learned District Attorney alongwith Sikandar Khan AD for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 27.02.2019 before D.B

<u>Order</u>

27.02.2019

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Arguments heard and record perused.

的有些

Vide our detailed judgment of today of this Tribunal placed on file, the appeal is dismissed. Parties are left to bear their own cost. File be consigned to the record room.

Announced: 27.02.2019

م مراجع بالمراجع

Member

(Ahmad Hassan)

Member

Member

(Hamid Farooq Durrani) , Chairman 19.10.2018

Counsel for the appellant present. Mr. Sikandar Khan, AD(Legal) alongwith Mr. Kabirullah Khattak, Addl: AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. Case to come up for arguments on 26.11.2018 before D.B.

(Hussain Shah) Member

(Ahmad Hassan) Member

26.11.2018

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney alongwith Mr. Sikandar Khan AD(legal) for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourn. To come up for arguments on 12.12.2018 before D.B.



Member

12.12.2018

Mr. Taimur Khan, Advocate for appellant and Mr. Ziaullah, DDA for the respondents present.

Learned counsel for the appellant requests for adjournment on the ground of engagement of learned senior counsel for the appellant before the Hon'ble High Court.

. Adjourned to 25.01.2019 before the D.B.



Chairma

15.05.2018

Appellant in person present. Counsel for the appellant is absent. Appellant seeks adjournment. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Sikandar Khan, AD (legal) for the respondents also present. Adjourned. To come up for arguments on 13.07.2018 before D.B.

(Muhammad Amin Khan Kundi) Member (Muhammad Hamid Mughal) Member

13.07.2018

Junior to counsel for the appellant and Mr. Muhammad Jan, Learned Deputy District Attorney alongwith Sikandar Khan AD for the respondents present. Junior to counsel for the appellant seeks adjournment as senior counsel is not in attendance. Being an old case of 2013, adjourned by way of last chance. To come arguments on 05.09.2018 before D.B.

(Ahmad Hassan) Member

(Muhammad Hamid Mughal) Member

05.09.2018

Appellant in person present. Learned counsel for the appellant is absent. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 19.10.2018 before D.B.

(M. Amin Khan Kundi)

Member

(M. Hamid Mughal) Member

23.11.2017

Learned counsel for the appellant present. Mr. Zia Ullah, Deputy Distrtict Attorney for the respondents present. Learned counsel for the appellant submitted wakalat nama on behalf of appellant which is placed on file. To come up for arguments on 22.01.2018 before D.B.

(Gül Zeb Khan) Member

(Muhammad Hamid Mugha)

22.01.2018

Counsel for the appellant present. Mr. Muhammad Jan, DDA alongwith Mr. Sikandar Khan, Assistant Director (Legal) for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 15.03.2018 before D.B.

Member

15.03.2018 None present on behalf of appellant. Learned Assistant Advocate General alongwith Sikandar for the respondents present. Adjourn. To come up for arguments on 16.05.2018 before D.B

(Muhammad Amin Kundi) Member (Muhammad Hamid Mughal) Member 12.06.2017

Son of the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Requested for adjournment. Adjourned. To come up for arguments on 08.09.2017 before D.B.

(Gul Zel/Khan) Member

(Muhammad Amin Khan Kundi) Member

8/9/2017

Appellant in person and Mr. Khabirullah Khattak, Assistant AG alongwith Mr. Ashraf Khan, Senior Clerk for the respondents present. Arguments could not be heard due to nonavailability of DB. To come up for arguments on 16/10/2017 before DB.

(Muhammad Hamid Mughal) MEMBER

16.10.2017

Learned counsel for the appellant present. Mr. Usman Ghani, District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 23.11.2017 before D.B.

(Ahmad Hassan)

Member (E)

(Muhammad Hamid Mughal) Member (J) 24.10.2016

Appellant with counsel and Mr. Muhammad Jan, GP for respondents present. Written arguments on behalf of the appellant submitted which is placed on file. To come up for oral arguments and further proceedings on 7.12.2016 before D.B.

hber

07.12.2016

Appellant in person and Mr. Liaqat Ali, Deputy Director alongwith Mr. Muhammad Jan, GP for the respondents present. One of the Member (Judicial) Mr. Muhammad Aamir Nazir is on casual leave therefore, the Bench is incomplete, hence adjourned. To come up for oral arguments and further proceedings on 17.3.17 before D.B.

(ASHFAQUE TAJ) MEMBER

2 mar

17.03.2017

Appellant in person and Addl:AG alongwith Mr. Liaqat Ali, Deputy Director (Lit) for respondents present. Appellant requested for adjournment. To come up for arguments on 12.06.2017.

(ASHFAQUE TAJ) MEMBER

(MUHAMMAD AAMIR NAZIR) MEMBER 20.5.2016

Counsel for the appellant and Addl. AG for respondents present. Counsel for the appellant requested for adjournment. Adjourned for arguments on 19.7.2016.

19.07.2016

Counsel for the appellant and Additional AG for the respondents present. Learned counsel for the appellant requested that the case may be adjourned today so that he may provide written arguments. One copy of such written arguments be handed over to the respondents. To come up for arguments of the respondents and further proceedings on $\frac{16-9-16}{16}$ before D.B.

une en la la

16.09.2016

Appellant in person and Mr. Muhammad Jan, GP for respondents present. Appellant submitted fresh Wakalat Nama and requested for adjournment. Request accepted. To come up for arguments on 24.10.2016.

Member

MEMBER



IBER

01.07.2015

None present for appellant. Mr.Irshadullah, Deputy Director alongwith Addl: A.G for respondents present. Written- reply not submitted despite last opportunity. Requested for further time. Last opportunity extended to 27.7.2015 for submission of written reply before S.B.

27.07.2015

- - -

Appellant in person and Mr. Irshadullah, Deputy Director alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 24.11.2015.

.Chairman

24.11.2015

Counsel for the appellant and Mr. Hamad Ameer, Junior Clerk alongwith Addl: AG for respondents present. Rejoinder submitted on behalf of the appellant which is placed on file. To come up for arguments on $2-\frac{9}{3}/\frac{3}{146}$

Member

ember

24.03.2016

Appellant in person and Mr. Ziaullah, GP for respondents present. Arguments could not be heard due to paucity of time. Therefore, the case is adjourned to 20.05.2016 for arguments.

Member

Counsel for the appellant and Mr. Irshad Muhammad, Supdt for respondent No. 4 with AAG for the respondents present. Written reply has not been received, and representative of the respondent as well as learned AAG requested for further time to file joint written reply Another chance is given for joint written reply/comments, positively, on 25.11.2014.

Counsel for the appellant and Mr. Muhammad Adeel Butt, AAG for the respondents present. The Tribunal is incomplete. To come up for written reply/comments on 10.03.2015.

Reader

10.03.2015 Counsel for the appellant and Addl: A.G for respondents present. Requested for adjournment. To come up for written reply on 15.5.2015 before S.B.

15.05.2015

25.11.2014

22.7.2014

Appellant in person and Addl: A.G for respondents present. Requested for further adjournment. Last opportunity granted for submission of written reply. Adjourned to 1.7, 2015 before S.B.

Chairman

10-912/2012 Hppenli

30.01.2014

Appellant Deposited Security & Process Fee Bank itached with File.

Appellant with counsel present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. He further contended that the instant appeal has been referred by the Peshawar High Court, Peshawar vide his order dated 08.05.2013 whereby the same has been treated as Service Appeal and to be decided by this Tribunal in accordance with law. Counsel for the appellant filed amended appeal with spare sets. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 24.04.2014.

30.01.2014

This case be put before the Final Bench _____ for further proceedings.

24.4.2014

No one is present on behalf of the appellant. M/S Sultan Shah, Assistant for respondent No. 3 and Irshad Muhammad, Supdt for respondent No. 4 with AAG for the respondents present. Written reply has not been received. To come up for written reply/comments on 22.7.2014.

1ber

Thaixma

Charmen

24.12.2013

Counsel for the appellant present and submitted amended

appeal with spare sets. To come up for preliminary hearing on

15.01.2014.

Member

4émber

15.01.2014

Counsel for the appellant present and requested for return of the amended memo of appeal to substantiate and revised the same. Requested is accepted and amended memo of appeal alongwith spare sets are returned to counsel for the appellant for the needful and returned the same on or before the next date. To come up for preliminary hearing on 30.01.2014.

. . .

Rimber

Member

<u>n ka</u>r

Chairman

adjourned. To come up for preliminary hearing on 17.09.2013.

17.09.2013

No one is present on behalf of the appellant. Notice be issued to the appellant/counsel for the appellant for preliminary hearing on 30.10.2013.

.

30.10.2013.

Appellant with counsel present. Since the case has been received from the High Court on the ground of lack of jurisdiction, where Writ Petition was lodged, the appellant shall file appeal in proper format for preliminary hearing on 24.12.2013.

Form- A

FORM OF ORDER SHEET

Court of_____

Case No. 912/2012

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	20/05/2013	The present appellant initially went in Writ Petition before the
T		Hon'ble High Court and the Hon'ble High Court vide its order dated
. *		08.05.2013 treated the Writ Petition into an appeal and sent the same to
· :		this Tribunal for decision in accordance with law. The same may be entered
		in the Institution Register and put up to the Worthy Chairman for
		· · · · · · · · · · · · · · · · · · ·
· .		preliminary hearing.
		REGISTRAR
		KEGISI KAR
2-	15-7-2013	This case is entrusted to Primary Bench for preliminary hearing to
2-		be put up there on $2 - 8 - 20/3$,
	· ·	
		CHAINEDIAN
•		
•		
		· · ·
·		
•		
•		
		· · ·
· ·		
·. • ·	·	

THE PESHAWAR HIGH COURT PESHAWAR

Ph: No. 091-9210149-158 Ext: No. 364

/Judl: No. Dated Peshawar the 2013

-----Petitioner

-----Respondents

From

The Additional Registrar (J), Peshawar High Court, Peshawar.

То

The Registrar, KPK Service Tribunal, Peshawar.

Subject

Parvez Khan, Deputy Public Prosecutor

Versus

Government of KPK & others

Writ Petition No. 1019-P/2013.

Memo:

I am directed to send herewith the titled case alongwith all annexures & copy of order dated 08-05-2013, passed by Division Bench of this

Court, for compliance.

ADDITIONAL REGISTRAR (J)

Encl:

As above.

D:\Ashfaq\WPE-2013\Send Case\1019-13 Parvez Khan vs Govt. of KPK 14-05-2013.doc

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A' FORM OF ORDER SHEET

Date of order.	Order or other proceedings with the order of Judge
8.5.2013.	<u>W.P. 1019-P of 2013.</u>
	Present: Mr.Muhaminad Adam Khan, advocate for petitioner.
	WAQAR AHMAD SETH, J Petitioner, through
	instant petition, seeks issuance of an appropriate writ
	directing the respondents to restore his promotion as
	Deputy Public Prosecutor with relevant service
	benefits effective from the year, 2003.
	2. The plea raised by the petitioner relate to terms
	and conditions of service for which the Services
	Tribunal has the exclusive jurisdiction while a straight the
	article 212 of the Constitution of Islamic Republic of
	Pakistan, 1973 the jurisdiction of this court is barred
	to entertain this petition, hence the same is held not maintainable. However, the petition is treated as
	Service Appeal and send to Services Tribunal for
	decision as per law/rules/policy of the Government on
	the subject.
	Petition disposed of in the above terms.
	JUDGE
	JUDGE
st. c//s/13	
L,	

BEFORE THE SERVICE TRIBUNAL PESHAWAR

Date of hearing 30-01-2014

Amended

Service Appeal No. 912/2013

Pervez Khan,

V/S

The Chief Secretary

INDEX

DESCRIPTION OF DOCUMENTS	ANNEXURE NO.	PAGE NO.S
Appeal of Affidavit		01-05
List of Books		06
Memo of Addresses		07
Result of Examination	А	08
Letter dated 10-06-2011	В	09
Letter dated 14-07-1991	С	10
Letter dated 15-09-2003	D	11
Letter dated 27-09-2004	E	12-14
Notification dated 24-09-2005	F	15-18
Applications dated 07-1-2013 & 22-02-2013	G &H	19-22
Letter dated 15-03-2013	I .	23
Letters dated 19-11-2008, 05-03-2009, 29-11-2008, 09-05-2009, 23-12-2008 , 11-02-2009	J to Q	24-29
Seniority List dated 10-03-2007	Р	30-36
Wakalat Nama		37
	Appeal of AffidavitList of BooksMemo of AddressesResult of ExaminationLetter dated 10-06-2011Letter dated 14-07-1991Letter dated 15-09-2003Letter dated 27-09-2004Notification dated 24-09-2005Applications dated 07-1-2013 &22-02-2013Letter dated 15-03-2013Letters dated 19-11-2008,05-03-2009, 29-11-2008,09-05-2009, 23-12-2008,11-02-2009Seniority List dated 10-03-2007	Appeal of Affidavit List of Books Memo of Addresses Result of Examination A Letter dated 10-06-2011 B Letter dated 14-07-1991 C Letter dated 15-09-2003 D Letter dated 27-09-2004 E Notification dated 24-09-2005 F Applications dated 07-1-2013 & G &H 22-02-2013 Letter dated 15-03-2013 I Letters dated 19-11-2008, J to Q 05-03-2009, 29-11-2008, J to Q 05-03-2009, 23-12-2008, 11-02-2009 Seniority List dated 10-03-2007 P

APPELLANT

(PARV AZ KHAN)

Through;

Muhammad Adam Khan Advocate Mardan

AMAD ADAM KHAN

BEFORE THE SERVICE TRIBUNAL PESHAWAR

Amended \\

Service Appeal No. 912/2013

Pærvez Khan, The Deputy Public Prosecutor, Swabi)......(Appellant) * (Resident of Village Kalu Khan District Swabi)

VERSUS

- 1. The Govt of KPK through The Chief Secretary, Province of KPK, Peshawar.
- 2. The Secretary Home and Tribal Affairs, KPK Peshawar.
- 3. The Secretary Establishment and Administration Department, KPK, Peshawar
- 4. The Secretary, Finance Department, Government of KPK Peshawar
- 5. The Director General, Prosecution Department KPK Peshawar

.....(Respondents)

SERVICE APPEAL U/S-4 OF SERVICE TRIBUNAL ACT, 1974

FACTS

(8-16

- 1. That the Appellant being the Law Graduate, was appointed as Prosecuting Sub –Inspector (BPS-11) in the Police Department on 13-5-1988. His salary was, later on fixed in BPS-14.
- 2. That appellant passed the upper Course Training with credit in the year 1989. (Copies Annexure "A" & "B")
- 3. That appellants name was placed in "F" list in 1991.

(Copy of Annexure "C").

29

- 4. That the appellant was due for promotion to the post of PDSP (BPS-13) when Prosecution Department was established in the year 2002.
- 5. That resultantly, the appellant alongwith other employees of the Prosecution Branch was transferred to Law Department and thereafter, to the Home Department in the year 2043 and the Appellant was designated as Deputy Public Prosecutor vide order dated 27-09-2004.

(Copies are Annexure "E").

6. That the post of the Deputy Public Prosecutor was placed in BPS-17.

(Copy of Annexure "F").

- 7. That the Appellant alongwith his other colleagues, approached The Government of KPK/The Chief Minister for the up-gradation of the post of the Deputy Public Prosecutor to BPS-17, which was accepted vide Notification dated 24-09-2003.
- 8. That inspite of up-gradation of the post of the Deputy Public Prosecutor to BPS-17, the appellant was deprived there from and he was kept in BPS-16.
- 9. That the Appellant after passing the Department Examination in 2012 was again ordered to the promotion as a Deputy Public Prosecutor in the year 2012, inspite of the fact that he had already been posted as such in the year 2003.
- 10. That the appellant represented for the restoration of his designation and salary as The Deputy Public Prosecutor (BPS-17) vide application dated 97- 1/2013, and on the alternate, for promotion as such.

(Copy Annexure "G").

11. That being at the verge of retirement i.e on 31-03-2013, the Appellant submitted another Application dated 20-02-2013, to respondent No-1, for the aforesaid purpose.

(Annexure "H").

- 12. That the Secretary/Respondent No.2, rejected both the aforesaid applications on 15-03-2013.
- 13. That a number of the employees of the Prosecution Department are granted promotion in the higher pay scales at the time of their retirement from service. But, the appellant is discriminated in this respect.

GROUNDS

- A. That the Appellant has completed twenty five (25) years service in Police Department, Law Department and Prosecution Branch of Home and Tribal Affairs, Department, KPK, Peshawar with clean and unblemished records.
- B. That appellant, at the time of institution of the Writ Petition, was at the verge of retirement from service on attaining the age of superannuation on 31-03-2013.
- C. That the District Public Prosecutor namely, Sahib Zada Sakindar, Muhammad Faheem, Attaullah Khan and so many other officers were given promotion to the next higher scale just to avail the pecuniary benefits of

the pension, in the higher scale. <u>(Copy of notification is attached as</u> <u>Annexure "I" to "J").</u>

D. That Mr. Lateef Khan Assistant Public Prosecutor, who was in BPS-16 was promoted to BPS-17 at the time of his retirement inspite of the facts that he had not fulfilled the mandatory requirements for promotion in next high as scale i.e. the passing of the Department Promotion Examination.

Copy of Notification is Annexure "N".

 E. That similarly Mr. Riaz UI Hassan Assistant Public Prosecutor, who had recently been upgraded from BPS-14 to BPS-16 was also promoted to BPS-17 at the time of his retirement.

(Copies are Annexure "O" to "P").

- F. That beside the accrued right of restoration of promotion post, i.e DPP the petitioner is entitled to the similar and equal treatment as granted to the other afore-mentioned colleagues and the refixation of pension in BPS-17 from the year -2003.
- G. That the Appellant being at the verge of retirement on 31-03-2013 had no other expeditions and adequate remedy. Hence, he approached the High Court of Writ Petition, which was converted into service appeal.
- H. That the appellant seeks leave of this Honourable Tribunal to claim further ground also.

It is prayed that accepting this Appeal, the Appellant may be considered for promoted as Public Prosecutor (B-18) with Eevision of prusion, with back lowifit. 4 The costs of this Appellant may be awarded in favour of Appellant against the Respondents.

> APPELLANT (PARVÁZ KHAN)

Through;

Muhammad Adam Khan Advocate Mardan

> MUHAMMAD ADAM KHAN B.A LLB Advocate High Court Mardan

Amended on 03.12.2013.

BEFORE.THE.SERVICE.TRIBUNAL, PESHAWAR.

Service Appeal No.912/2013

Pervez Khan

V/S The Govt. of KPK etc.

AFFIDAVIT

I, Parvez Khan/ The Appellant resident of Village KaluKhan District Swabi do hereby state on solemn affirmation that the contents of the accompanied appeal are true and correct to the best of my knowledge and belief and that nothing is concealed from this Honorable Tribunal, in this respect.

PERVEZKHAN

(Deponent) Dated 2 2013

BEFORE THE SERVICE TRIBUNEL, PESHAWAR.

Service Appeal No.912/2013.

Pervez Khan

V/S

The Govt. of KPK etc.

LIST OF BOOKS

1. The Civil Servants Act, 1973.

2. The Service Tribunal Act. 1974.

3 The Prosecution Act.

4. Any other law book or judgment deemed relevant.

Appellant 'EZ KHAN)

Through

MuhammadAdam Khan Heran Advocate, Mardan.

MUHAMMADADAMKHAN BALLBARKOGAE HIGH COURTMARGAR

, BEFORE THE SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.912/2013

Pervez Khan

V/S

The Govt. of KPK etc.

Memo; of addresses:

APPELLANT:

Parvez Khan, The Deputy Public Prosecutor, Swabi (Resident of Village KaluKhan District Swabi).

RESPONDENTS:

1. The Govt. of KPK through Chief Secretary Province of KPK Peshawar.

2. The secretary , Home and Tribal Affairs, KPK, Peshawar.

3. The Secretary Establishment and Administration Department, KPK, Peshawar.

4. The Secretary , Finance Department , Govt. of KPK, Peshawar.

5. The Director General, Prosecution Department, KPK Peshawar.

APPELLANT

(PARVEZ KHAN)

Through

MuhammadAdamKhan Advocate Mardan

TREXUIT DAN KHA RAINI ----SF -A-I)PUR SHEET HISTORY VIII-INSPECTORS COURSE. NAME Jazuez -A. SIO Manine Zada 108 Dawabi DISTRICT TRAINING PERIOD 7-1-89 TO 29-6-89 MARKS AL LAW.SUBJECTS Total Obtained Leave trailed 1. 1 P.P.C 87 100 21 Cr. P.C. Overstay Leaus 100 85 3 Evidence Act Lij 50 Absent w/o intuve 4 L.S.L. with Books :00 84 Sick Report without ELS.L. 100 Books Punishmene 6. Police Fules. 100 Rewards 7 P.P.W. :00 8. Med-Juris Prüdence 100 Ľ, 3. Finger Prints 83 100 ERAL OBSERVATIONS. 10. | Scientific Aids. 31 50 Hardworking and a 10 Security: · . 12. Plan Drawing. 34 efficient officer. He tool desided integris histor 5Ò. 18. Hsianniat - This 100 Memo Writting 65 100 15 Oral Speech 63 100 15. Totai, 957 1250 B. DRILDSUBJECTS 1 Driff 110 2. Musketry 150 Total. 260 S. CONDUCT 100 85 GRAND TOTAL 229 1610 °A, B & C 🖓 OVER ALL 76-33 PERCENTAGE En Cold Soll - Credit SSED -READERT All and a state of the second s ER OF 2 PRINKPAR

	BE	PPER COPY	of American 4754
		Police).	of Annexuse _ A"
POLICE		AINING	SCHOOL PP-08
	SHAHDI	DPUR	ATTESTED
			ADAW KHAN
SC	HOOL HIST	YORY SHEET	· · ·
PROSECT	ING SUB	INSPECTORS	COURSE
NO. BANK PEI	NAME	PRPURT	KHAN SZO AMIR ZADA KHAN
DISTRICT SAWA BI	<u>, </u>		<u>регіор: 07.01.1989 то 29.6.1989</u>
LAW SUBJECTS	MARK TOTAL	S OBTAINSD	Leave availed
P.P.C.	100	87	Overstay Leave
Cr.P.C.	100	85	×
Evidence Act	50	41	Absent w/o leave
LS.L. with Books	. 100	84	Ciole Deserve
L.S.L without Books	100	74	Sick Report
Police Rules	100	77	Punishment
₽°Ъ°М°	100	79 🖇	
Med Juris Prudence	100	74	Rewards
Finger Prints	100	83	

00000

83

31

34

79

65

63

957

¹ 70

117

187

85

1229

h,

GENERAL OBSERVATIONS

Hard working and an efficat Officer . He took desired interest in his training.

Sd/-(MAZHAR ALI SHAH) PRINCIPAL

3

PASSED/EDICAS

Α.

1.

2,

3.

<u>л</u>.

5.

6.

7.

8.

9.

16.

1,

5.

(0)

10. Scientific Aids

11. Security

13. Islamiat

12. Plan Drawing

14. Memo Writing

15. Oral Speech

Total:

Drill

Total

CONDUCT

A, B & C

OVER ALL PERCENTAGE

GRAND TOTAL

Musketry

(B) DRILL SUBJECTS

ROF

with credit

76.33

100

50

-

50

100

100

100

1250

110

150

260

100

1610



Government Of Khyber Pakhtunkhwa Home & Tribal Affairs Department No.SO (Prosecution)/HD/1-10/2010 Dated Peshawar the 10/06/2011.

Annexure

ATTESTED

Ē

NOTIFICATION.

No.SO(Prosecution)/HD/I-10/2010. The following Assistant Public Prosecutors DAM XHAN (BPS-16) are declared passed in the Departmental Examination mandatory under the Khyber Pakhtunkhwa Prosecution Service Rules, 2010, held in the month of May, 2011 :-

S.#	Name	Roll No.
1	Muhammad Shakeel Ahmad	040
2	Mr.Iltaf Hussain Akhtar	024
3	Muhammad Saleem	016
4	Mr. Abdul Salam	006
5	Mr. Javed Iqbal	032 (
6	Syed Falak Sair	050
7	Qazi Aftab Ahmad	013
8	Mr.Khalid Khan	046
9	Mr.Altaf Hussain	023
10	Mr. Imran Shah	015
11	Mohammad Shoaib	033
12	Muhammad Afzal Khan	037
13	Muhammad Nadeem	042
14	Mr.Tasawar Hussain	047 .
15	Sheikh Zahoor Ahmad	026
16	Mr. Rab Nawaz Khan	002
17	Mr. Atta Ullah Khan	041
18	Mr.Atta Ullah	001
19	Mr. Javed Hussain	014
20	Mr. Fazli Hadi	030
21	Mr.Anis Ahmad Jan	022
22	Mohammad Changaiz Khan	027
23	Mohammad Zahoor	012
24	Abdul Hameed	017
25	Mr.Zulfiqar Khan	018 /
26	Mr.Pervez Elahi	020
27	Mr. Israr Ali	021
28	Syed Murtaza Shah	025
29	Mr.Amanullah Khan	048
30	Mr. Abdul Rashid	031
31	Mr. Muzaffar Ahmad	049
32	Mr.Javed Rehman	051
33	Mr.Kirmatullah Khan	005
⇒ 34	Mr.Pervaz Khan	011
35	Muhammad Qaisar Khan	004
36	Mr. Sher Zaman	003
37	Mr. Sher Bahadir	044

Place Fr



Government Of Khyber Pakhtunkhwa Home & Tribal Affairs Department No.SO (Prosecution)/HD/1-10/2010 Dated Peshawar the 10/06/2011.



38	Mr. Ziaullah Wazir	045
39	Muhammad Nasir	036
40	Mr. Ibrahim Khan	008
41	Mr. Abdul Sahkoor	010
42	Mr. Hayatullah	043

However, the following candidates could not get the qualifying standard and have been declared as failed:-

S.#	Name	Roll No.
1	Mohammad Khalid	007
2	Mr. Saeed Gul	009 5
3	Mr. Zaheer-ud-Din Soofi	029
4'	Mr. Khurshid Amvar	034
5	Mr. Shamsuz Zaman	035
6	Muhammad Speed	038
.7	Mr. Javed Iqbal Anwar	039

Secretary to Govt of Khyber Pakhtunkhwa, Home & Tribal Affairs Department.

Endst: No.SO(Pros:)/HD/1-10/2010.

Dated Peshawar the 10/06/2011

 $(\bigtriangleup$ 0

,13

Copy forwarded for information to: -

1)-The Director General, Prosecution, Khyber Pakhtunkhwa, Peshawar. w/r to his letter No.DP/E&A/4676, dated 24/05/2011.

2)-All District Public Prosecutors in Khyber Pakhtunkhwa.

3)-Officers concerned

00

 \boldsymbol{c}

4)-P.S. to Secretary, Home & Tribal Affairs Department

Ч, USMAN ZAMAN),

Section Officer (Prosecution)

Annexure ATTESTED FOR PUBLICATION IN THE WFP POLICE GAZETTE PART=II ORDERS . 3Y THEIRSPECTOR GENERAL OF POLICE NWFP PESHAWAR. ADAM KHAN NOTIFICATION. DATED PESHAWAR THE /4 - 7.1991 12960 /E-II LIST 'F' :- Names of the following NO. Prosecuting Enb Inspectors of NWFP Police are brought on promotion list 'F! w.e.from 9.7.1991:-1. Ibrahim Khan M/94 of Malakard Range. 2.Mohannad Pervesh M/38 of Malakand Range.
3.Saeed Gul H/84 of Hazara Range.
4.Abdul Shakoor H/3 of Hazara Range.
5.Iftikhar ul Mulk MR/26 of Mardan Range.
6.Rast Baz Khan D/66 of D.I.Khan Range.
7.Intiaz Gul 15/K of Kohat Range!
8.Aziz ur Rehman 28/K of Kohat Range.
9.Hafizullah D/69 of D.I.Khan Range.
10.Abdul Hamid Shah D/49 of D.I.Khan Range.
11.Abdul Sattar D/62 of D.I.Khan Range.
12.Falak Naz K/29 of Kohat Range.
14.Aftab Ahmad H/63 of Hazara Range. 2. Mohamman Pervesh M/38 of Malakand Range. 15.Monenmad Zanoor 1/21 of D.1. nnan Range. 14.Aftab Ahmad H/63 of Hazara Range. 15.Imran Shah M/20 95 of Malakard Range. 16.Monanmad Seleem M/85 of Malakard Range. 17.Javaid Hussain M/86 of Malakard Range. 18.Pervez Khan P/305 of Mardan Range. 19.Zulfigar Khan of Peshawar Range. 20.Ayaz Jul Hag of Peshawar Range. No 21. Jamal Khattak of Peshawar Range. 21.Jamal Khattak of Peshawar Kange. 22.Mohanmad Arif of Peshawar Range. 23.Latif Khan P/265 of Peshawar Range. 24.Hidayat Shah P/348 of Peshawar Range. 25.Mir Mohammad Shah M/52 of Malakand Range. 26.Mian Mustafa Gul K/25 of Kohat Range. 27.Ghulam Hussain D/54 of D.I.Khan Range 29000X SYED MASUD SHAH INSPECTOR GENERAL OF POLICE MVFP PESHAWAR. NO. 12961 - 99 /F-II dated Peshawar, the 14 - 7. 1991 Copy of above forwarded for information and - 7**. 19**91. n/action to the:-1. All Dy: Inspectors General of Police, in NWFP. 2. All Distt: Supdts: of Police, in NWFP. 3. Director ACE NWFP Peshawar. 4. All Asstt:Inspectors General of Police in NWFP.
5. Principal PTS Hangu.
6. Asstt:Secret CPO Peshawar. 7. U.O.P.Files. 1417181 (ISRAR MOHAMMAD XHAN) DIG HQRS: FOR INSPECTOR GENERAL OF POLICE 5.7.91

with history with the providence of a second station that GOVERNMENT OF NWFP PARLIAMENTARY AFFAIRS & HUMAN LANL, RIGHTS DEPARTMENT. 72003. DATED POSHAWAR THE ORDER NOSDE-01(21)2002/KC1- CONSOQUERA MEEN DAM ARAVAL OF Annexure Mr. Pervez Minn, Pronecution Inspector, is hareby pasted as Doputy Public Prosocutor, Swall, with immediate ATTESTED ĸ ADAM KHAN offoct. SECRETARY TO GOVTIOF MUPP. LAW DEPARTMENT. 120030 ENDST. NOIDP-01(11) 2002/KC/ 3263-72 DATED Copy of the above is forwarded to:-The Distrinccounts Officers Swapile 1-The Senier Civil Judge, Swable 2-The Public Prosocutor, Swabi. 3. The D.S to SecysTo Govinos NEFP, Law Deptie 4. The Section Officer (Presecution) Marka Deptt 5--for informations] The Officer concerned. 6. The P/File of the Officer concernade 7-The Accountant "Liti Cell" Law Departments. 8... RM OR PROSECUTION DIRECT WIPP LAW DEPARTMENT. ß

BETTER COPY

GOVERNMENT OF NWEP

of Annexuel

/2003

LAW PARLIAMENTARY APPAIRS & HUMAN RIGHTS DEPARTMENT

Dated Peshawar the

ADAM KHAN

ORDER

NC:DP-01(11)2002/KC:- Consequent upon his arrival of Mr. Pervez Khan Proseuction Inspector, is hereby posted

as Deputy Public Prosecutor, Swabi with immediate effect.

Secretary to Govt. of NWFP LAW DEPARTMENT

ENDST. NO. DP-01(ii)2002/KC/3963-70 DATED 15/09/2003

COPY OF THE ABOVE IS FORWARDED TO :-

1. The Distt: Accounts Officer, Swabi.

2: The Senior Civil Judge, Swabi.

3. The Public Prosecutor Swabi.

4. The P.S. to Secy. To govt. of NVFP Law Deptt:
5. The Section Officer (Prosecution) H& TAB Dept: for information.

6. The Officer concerned.

7.

8;

The P/File of the Officer concerned.

The Accountant "Lit:Ceal' Law Department.

Sd/-

DIRECTOR PROSSCUTION NWFP

LAW DEPARTMENT

GOVERNMENT OF N.W.F.P, AND LAW, PARLIAMENTARY AFAIRS AND HUMAN RIGHTS DEPARTMENT, PESHAWAR.

Dated Peshawar the 27/09/2004.

NOTIFICATION.

ため、「なない、日本語のないないないないないないないない」

いたいで、日本の国家の内部市の日本市場におい

No.E&A(LD)6-387/2003: - Consequent upon the separation of Prosecution in pursuance of Establishment Department (Regulation Wing) notification No. SO (O&M)E&AD/2-11/2002 dated 17/03/2004, the following: Public Prosecutors, Additional Public Prosecutors, Deputy Public Prosecutors, Assistant Public Prosecutors, and Ministerial Staff from Mufassil Establishmet Law Department are hereby relieved and rendered their services to the N.W.F.P, Home Department with immediate effect.

PUBLIC PROSECUTORS

Mr. Sher Muhammad Khan 1 Mr. Muhammad Ilyas Khàn Mr. Younus Khan Shinwari 2 17 Mr. Muhammad Zaman Khan 3: Mr. Attaullah Khan 18. 4. Mr. Abdul Qyoum Khattak Mr. Muhammad Idrees Khan 19. 5. 20. Mr.: Muhammad Zubair Mr. Mushtag Ahmad Mr. Sikandar Azam 6 Anwar Mr. Bilal Muhayudin 21. Sahibzada 7. Mr. Abdul Mueed Khan 22. Mr. Fakhrul Islam Mr. Muhammad Sultan 8. Mr. Muhammad Faheem Jan 23. 9. Mehmood Mr. Said Bashar Khan ŀ0. 24. Mr. Shah Alam Khan Mr. Amjad Ali Mr. Sikandar Hayat Khan 25. 11. Miss Surriya Jabeen 26. Mr. Muhammad Ibrahim Mr. Saif-ur-Rahman Khan 12. Mr. Amir Subhan Khattak Mr. Sanaullah Khan 13. 22 Mr. Muhammad Nawaz Khan 14 Syed Ferooz Shah 28; 29. Mr. Asmat Isa Khan Mr. Mujarrab Khan Mr. Muhammad Akram Khan 30. Mr. Tariq Bakhsh Mr. Taj Noor Khan 31. ADDITIONAL PUBLIC PROSECUTORS 1. Mr. Shah Zada 9) 2. Mr. Abdul Wajid Khan Mr. Alamzeb 10. 3. Mr. Liaqat Ali Mr. Gul Waris Khan 11. 4. Mr. Raza Khan Mr. Sibghatullah Mr. Muhammad Younas. 12. 5. Mr. Farmanullah 13. 6. Mr. Ghulam Mustafa Mr. Arifullah Shah 14 7. Mr. Muhammad Jahanzeb Mr. Zafar Abbas Mirza 15. Mr. Muhammad Zahcer-ud-Mr. Nisar Alam 16 Mr. Attaur Rahman Din DEPUTY PUBLIC PROSECUTOR Mr. Akbar Khan Mr. Abdus Salam . 13. 2. Mr. Qisar Khan 🗸 14 Mr. Shujat Ali⁻Khan-3. Mr. Attaullah Khan 15. Mr. Ibrahim Khan_ Mr. Rabnawaz Khan Mr. Abdul Hameed Shah 16. Mr. Sher Zaman-Mr. Muhammad Azam Awan 17 Mr. Pervaiz Khan-18. Mr. Muhammad Khalid-Mr. Rast Baz Khan 19. Qazi Aitab Ahmad 8. Mr. Muhammad Zahoor 20.Mr. Abdul Shahkoor 9. Mr. Kiramat Ullah 21 Mr. Javed Hussaine 10. Mr. Impon Stud.

	Mr. Muhammad Saeed
	Mr. Zulfiqar Khan
- -	Mr. Pervaiz Ilahi
1	Mr. Attiq-ur-Rahman
	Mr. Riaz Hussain
	Mr. Arbab Bashir
7.	Mr. Muhammad Nisar
8	Mr. Jamal Khattak
9. [`]	Mr. Fazli Hadi
10, -	Mr. Muhammad Shuaid Khan
	Mr. Noor-ul-Wahab
	Mr. Zia Ullah Wazir
	Mr. Aman Ullah
	Mr. Hayat Ullah
	Mr. Atta Ullah
	Mr. Sher Bahadur
17.	Mr. Tasawar Hussain
18. 7	3Mr. Muhammad Shakeel
	Ahmad
	·

MINISTERIAL STAFF

- Mr. Munir Alam, Assistant - Mr. Said Habib, Assistant

JUNIOR CLERKS

2.

	· · · ·
1. Mr. Muhammad Ghaffar	· · ·
2. Mr. Dilshad Khan	
3). Mr. Magsood Ali	·
4. Mr. Sher Ali	
5.º Mr. Ashraf Din	• •
11. Mr. Khan Azad	
12. Mr. Abdul Sattar Khan	
13. Mr. Shah Faisal	
14 Mr. Ghulam Habib	
14. Mr. Ghulam Habib 15. Mr. Bashir Ahmad	
16. Mr. Hidayat Ullah	
17. Mr. Muhammad Tariq	
17. Mr. Maider Ali	·
- 19. Mr. Muhammad Gulzar	• A1i
20. Syed Nazmat Ali Shah	1
21. Mr. Muhammad Hama	yónn.
22. Mr. Qamar Zaman	yuun
23. Mr. Shakeel Akhtar	/
24. Mr. Muslim Khan	
24. Mr. Mushin Khan 25. Mr. Sikandar Hayat	
- (26) Mr. Mubarak Ahmad	
27. Mr. Muhammad Iqbal	
28. Syed Abu Ubaida 👘 29. Mr. Shahid Gul	. 1
30. Mr. Mumraiz Khan	. :
50. MIL MUHHAIZ INIAN	. *

31. Mr. Sahibzada

19.	Mr. Mustafa Kamal
20,	Mr. Iltaf Hussain
21.	Mr. Ances Ahmad Jan
22.	Mr. Muhammad Ayaz
23.	Mr. Umar Farooq 💈 👘
2.1	Mr. Murtaza Shah
25.	Mr. Changiz Khan
26.	Mr. Muhammad Arshad ' .
	Khan
27.	Mr. Muhammad Iftikhar
28.	Mr. Shams-uz-Zaman
29.	Mr. Khurshid Anwar
30,	Mr. Muhammad Ajoon
31.	Mr, Muhammad Afzal
32.	Mr. Muhammad Nadeem
33.	Mr. Hazrat Ali Shah
34.	Mr. Abdul Hameed
35	Mr. Abdul Rasheed
36.	Mr. Muhammad Khalil

 Mr. Niamat Ullah, Steno Typist

Mr. Muhammad Iqbal
 Mr. Habibullah Jan
 Mr. Maqsood Ahmad
 Mr. Tariq Hussain
 Mr. Hukmat Khan

32. Syed Hakeem Shah 33. Syed Ibrar Shih 34. Mr. Abdul Wahid 35. Mr. Muhammad Arshad: 36. Mr. Sakhawat Shah 37. Malik Rahmant Ali 38. Mr. Ajmal Khan-39, Mr. Muhammad Ali 40. Sycd Alam Shah-41. Mr. Musawir Jan: 42. Mr. Yaqoob Khan 43. Mr. Muhammad Yousaf 44. Mr. Muhammad Arif 45. Mr. Khurshid Anwar 46. Mr. Aurangzeb 47. Mr. Muhammad Rizwan (48)Mr. Muhammad Ali 49. Mr. Fida Muhammad 50. Mr. Hazrat Muhammad 51. Mr. Khirullah Jan 52. Mr. Muhammad Saeed ohanmaid

ちく ステリア シン・シー

	and the second			•	e	•:	
	Oles	λ	<i>(//4) and</i>	::		58 Q	
1	Mr. Sami Ullah	25.	Mr. Zarshad	ः ।	(ġ.	
1.		- 25)	Mr. Abdur Rahim	i fij	e sie de	蕸	
2.	Mr. Imdad Khan	~ 20)				漓	TERES.
3.	Mr. Muhammad Amin	~ 211.	Mr. Shakir Ullah				
4. 5.	Mr. Sabz Ali	~ (28)	Mr. Muhatatash				1.1.1.1.1.1.1
	Mr. Zaiwar Shah	- (20)	Anwar Maslanda Misa				
, 6. 7.	Mr. Fazli Rabi	- (200	Mr. Jamshid Khan	2		ni A Lite	
7 <u>.</u> 8.	Sufi Abdur Rahim		Mr. Abdullah Khan	• ÷			「製作す」
s. 9.	Mr. Mchraban Shah		Mr. Yasin Khan •		····		
9. 10.	Mr. Muhammad	130	Mr. Juma Khan		• .	jų į	·
10.	Ashraf	34	Mr. Ain-ul-i-laq				
11	• • •	34.	Syed Nawab				· · ·
11. .12	Mr. Anwar Khan Mr. Ikram Ullah		Mr. Bakhat Pervaish			1	•
		36.	Mr. Habib Gul		-		
13.	Mr. Sher Rahman	37.	Mr. Imran Khan		•	2	
14	Mr. Asghar Ali	38.	Mr. Muhammad Tahir			Į.	
.15.	Mr. Mulianinad	39.	Mr. Farmanullah				
	Saleem	40.	Mr Khista Rahman			:	
16.	Mr. Zahoor Ahmad	41.	Mr. Subhan Ullah				
17.	Mr. Yasir Khan	42.	Mr. Humayoon			•	
18, 19,	Mr. Ramball Khan	43.	Mr. Aslandyar Gul				
20.	Mr. Ikram Ullah Khan Mr. Younas Khan	44.	Mr. Abdul Majid		•		
21.	Mr. Israil	45. 46.	Mr. Abul Salam				
22	Mr. Guldad	40.	Mr. Muhammad				•
23.	Mr. Sartaj Khan	47.	Yahya Mr. Jamshid Ahmad				
24.	Mr. Abdul Salam	48.	Mr. Pir Said				
••••		ч о .	with the option				. '
49.	Mr. Ikram Ullah	62.	Mr. Nazim Ali	·	•		•
49. 50.		63.	Mr. Irshad Khan			•.	. :
50. 51.	Mr. Haider Ali	64.	Mr. Shaheed Uilah			•	;
52.	Mr. Nasir Ali :	65.	Mr. Imran Ayaz				
53.	Mr. Sair Zahab	66.	Mr. Hukam Zad Khan	L			
55. 54.	Mr. Vali-ur-Rahman	67.	Mr. Habib-ur-Rahmar	۱ _.			:
55.	Mr. Syed Pir Hussain	68.	Mr. Rahmat Fayyaz				:
	Shah	69.	Mr. Asmat Ullah		:	;	
56.	Mr. Muhammad	. 70.	Mr. Adam Khan		÷		. 9. (5.
50.	lshfaq	71.	Mr. Sher Zaman				. 1
57.		. 72	Mr. Muhammad	•			
	Hassan		Rustum	-	•		
53.	Mr. Riast Wall	73.	Mir, Tasleem Khan	•	-		
5.9.		74.	Mr. Rahim Badshah		•		
60.	Mr. Pervaiz Khan	75.	Mr. Norooz Khan				
61.	Mr. Fazli Haq				1:	-{	
- • •	÷ ,		•				

(AMIR GULAB KHAN)

SECRETRY TO GOVERNMENT OF NWFP, LAW, PARLIAMENTARY AFAIRS AND HUMAN RIGHTS DEPARTMENT, PESHAWAR.

DATED 27/09/2004

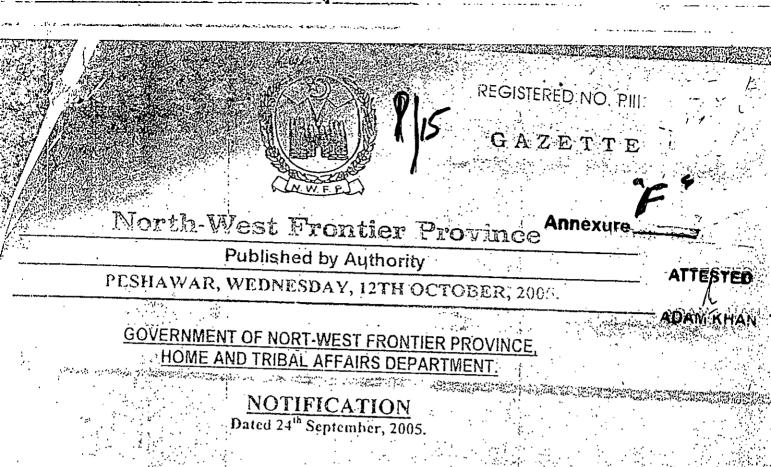
アードについて

Copy of the above is forwarded to:-

Endst.No.E&A(LD)6-387/2003/4113,4433

(rei)

- 1. All the Administrative Secretaries, N-W.F.P
- The Secretary to Governor, N-W.F.P.
- 2. The Secretary to Chief Minister, N-W.F.P.
- The Private Secretary to Provincial Minister for Law and Parliamentary Affairs 3. 4.
- N-W.F.P. The Private Secretary to Chief Secretary, N-W.F.P. 5
- All the District Coordination Officers/Political Agents, N
- The Secretary Public Service Commission, N-W.F.P. 7.
- The Registrar, Peshawar High Court, Peshawar. The Registrar, Service Tribunal, N-W.F.P., Peshawar.
- 8. 9.
- 10. The Advocate General, N-W.F.P., Peshawar.
- 11. The Accountant General, N-W.F.P., Peshawar.
- 12. The Director of Prosecutions, N-W.F.P., Home Department
- 13. All the District Accounts Officers, N-W.F.P.
- 14. The Director Information, N-W.F.P., Peshawar.
- 15. The Controller Government Printing Press Peshawar.
- 16. All the Public Prosecutors, Additional Public Prosecutors and Additional .
 - Government Pleaders, N-W, F.P.
- 17. The Officers/Officials concerned. . 18. Accountant "Mufassil Establishment" N-W.F.P., Law Department.
- 19. Computer Operator, Law Department.



No.SO(Prosecution) HD1-5/2005. In pursuance of the provision contained in Subrule (2) of Rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transferi Rules, 1989 and in supersession of all previous Notification in this behalf the Home and Tribal Affairs Department, in consultation with the Establishment, Administration and Finance Departments, hereby lay down the method of recruitment, qualifications and promotion. Notification shall be applicable to the posts borne on the strength of Directorate of Prosecution.

> Sd/-xxx SECRETARY TO GOVERNMENT OF NWFP, HOME AND TRIBAL AFFAIRS DEPARTMENT.

409 NWFP GOVERNMENT GAZETTE, EXTRAORDINARY, 12TH OCTOB

1/16 -7

NWFP PROSECUTION SERVICE RULES

In exercise of powers conferred under Sub Rule 2 of Rule 3 of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Home Departmentain consultation with Finance and Establishment Department is pleased to frame the Service Rules for the Prosecution Institution.

Short title, extent and commencement:-

These rules may be called as the North-West Frontier Province Prosecution Service Rules 2005.

 2^{i} These shall extend to the whole of the NWFP.

3. These shall come into force as and when notified in the official gazette.

4. Definitions:-

(a)

- Director General Prosecution' means the Chief Prosecutor of the Province responsible for the management of Prosecution and control over Prosecutors appointed under sub section (3) of section 3 of this Act.
- (b)
- 'District Head of Prosecution' means the District Public Prosecutor or, where no District Public Prosecutor is appointed in a District, the Public Prosecutor of the District concerned:
- (c) 'Public Prosecutor' means a person appointed under Section 492 of Cr.P.C. and includes District Public Prosecutor, Deputy Public Prosecutor and Assistant Public Prosecutor as well as Special Public Prosecutor; and

5. The Prosecution Service shall be headed by a Director General Prosecution who shall be an Officer in BPS-19. He shall head the administration of Prosecution Service as an attached Department of Home & Tribal Affairs Department.

The Director General Prosecution shall be assisted by the following officers.

- (i) Director (Legal) in BPS-18.
- (ii) Director (Admn) in BPS-18.
- (iii) Assistant Director Administration-cum-Finance in BPS-17.
- 7. The Prosecution Service at the district level shall be headed by an officer in BPS-18 to be designated as District Public Prosecutor.

8. The District Public Prosecutor shall also be responsible for the administration of prosecution service in the district.

- 9. The District Public Prosecutor shall be assisted by such number of Public Prosecutor in BPS-18, Deputy Public Prosecutor in BPS-17 and Assistant Public Prosecutors in BPS 16 as the Government may, from time to time, determine keeping in view the number of courts in the province, provided that Assistant Public Prosecutor shall prosecute cases only in the courts of Magistrates.
- 10. Entry into Service:-
 - (a) Entry in to Prosecution Service shall be at the level of Assistant Public Prosecutor (BPS-16) through the NWFP Public Service Commission.
 - (b) The probation period of appointees shall be two years. Probationers shall receive the basic training for a period of six months, which shall include three months in the state state of the basic training for a period of six months, which shall include three months in the state of the basic training for a period of six months, which shall include three months in the state of the basic training for a period of six months, which shall include three months in the state of the basic training for a period of six months, which shall include three months in the state of the basic training for a period of six months, which shall include three months in the state of the basic training for a period of six months and the basic training for a period of six months are state of the basic training for a perio

	Zover vmen	T GAZI	FTTE EXTRAORI	NRY, 12TH OCTOBER, 2005.	410
		<u>, ()()</u> ,	}		1. <u>1</u> . 1.
	Nomenclature	Scale	Minimum Qualification	Method of appointment	Age Limit
	Director General Prosecution.	19		i) By promotion from amongst the Public Prosecutors.	
				ii) By transfer from amongst the Officers of PCS/DMGs.	
2.	Director Administration	. 18		i) By transfer from amongst the Public Prosecutors.	-
				ii) By transfer from amongst the Officers of PCS/ DMGs.	and and a second se
3. V	Director Legal	18		By transfer from amongst the Public Prosecutors.	-
A	Public Prosecutor	18	•	By promotion from amongst the Deputy Public Prosecutors.	rstring of the second and
5	Deputy Public Prosecutor	17	Law Graduate at least 2 nd division from recognized University.	amongst the Assistant Public Prozecutors. i) 50% by initial recruit-ment	·
				Commission.	
. 	Assistant Director Admn-cum- Finance	17	•	By transfer from amongst the Deputy Public Prosecutors.	-
7.	Assistant Public Prosecutor	16	Law Graduate at least 2 [∞] division from		23-32 years

11. Eligibility Requirements:

- i) A person shall be eligible to be appointed as Ass ant Public Prosecutor who possesses a Law Degree from a recognized university.
- ii) The age limit for a person to be appointed as Assistant Public Prosecutor shall be from 23 to 32 years.

2. Promotion.

- Subject to the availability of posts:
- i) Promotion of BPS 19 shall be on the b
 - Promotion of BPS 19 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-18, subject to completion of at least 12 years service in BPS 17 & 18.
 - ii) Promotion to BPS 18 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-17, subject to completion of al least 05 years service in BPS 17.
 - iii) Fromotion to BPS 17 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-16, subject to completion of at least 05 years service in BPS 16 and qualifying of the departmental promotion exam.

Method of appointment and promotion of ministerial staff.

⊜ S. , 1			Minimum Qualification	Method of recruitment	Age
Ng		of post			Limit
	Librarian. Analysis	6 16	B.A. wig Diploma in the second	By initial recruitment	23-32 ;
	and the second se		Library beience: 10 10 - 20	through PSC	years ,
		開始ない		By promotion on the	
ALC: U.S. web	Superintendent (13 A 1		basis of schiority-cum-	
	-cum-	7		fitness from amongst	
行动的	Accountant			the Assistants with at	
				least 10 years service	
	·			as such.	

NWFP GOVERNMENT GAZETTE, EXTRAORDINARY, 12TH OCTOBLE

<u>1977</u>

 $V = \{1, 2\}$

2

: .	411	NWFP G	OVERT	INIENI	VIL	<u> </u>	·		· - ,	K
•			r			nimum Qualification	Meil	nod of recruitment	Agelf	CALL AND
٠ſ	S.	Nomencla	ature	Scale	1.1411	mmun Quantoni-	1. · · .		1 imit 1	
	No.			of post		Lataria Dagree (2nd	By .	initial recruitment	1 - 0	
\mathbf{F}	3.	Statistica	I/Data	12	i i B	lachelor's Degree (2 nd	through	ugh Public Service	years	NY N
	<i>.</i> ,	Processin	1g.		: C	lass) with Physics,		imision.		1
		Supervis	or		1 . S	Statistics for Econo-			· · ·	1 4.
ļ		CHENCE WAR	: 			nics as one of the				
					5	subjects from a reco-				1 1
		· .				gnized University: and				
			· .		l ii.	Three years experience		محمد و	· · · ·	
			• • •			in the field of date	1 1 -			
			· . ·			processing and super-	- .			
			· .			visory experience and	u			
						data control and punct	h []			
						verifier operation.			1 18-30	5 1 .
	··-		· · · · · · · · · · · · · · · · · · ·	12		Intermediate or equi		initial recruitmen	• }.	
	4.	Junior	Scale	- · · · · ·		valent qualificatio	տ լ ա	rough Public Service		
		Steans	apher.			from a recognize	ed Co	ommission.		
	1					buard and	· 1			ļ.,
	\ .					A speed of 60 word	ds			
						ner minutes in she	m			- 1 - C
	· •				.	- hand in English and .	32 1	. · · · ·		
		· ·			1.	words per minutes	$ \mathbf{m} \geq$			· · ·
				1. A. A.	:	typewriting & know	le-			{ :
			••		. • .	dee of Computer	m		•	
	1					using of MS word	& .			
						MS Excel			$\frac{1}{18}$	30
			· · · · ·			Bachelor's degrees fro		, 75% by promotio)
		5 Assis	iant			a recognized Universit	yl	on the basis		
						a conception of a	• [•	seniority-cumfitnes	5 - F	
						1		from amongst sen		
	l					t t	-	clerks with at le	ast	
			•					five years service.		
					ļ			b. 2,5% by init	E .	
					·		•	recruitment throu	រខ្លារ	
	: [$\frac{1}{2} = \frac{1}{2} \left[\frac{1}{2} \left[$		PSC.		
	·					: Canadamy Sch	nool	By initial recruitm		-30
			-Key		0	1. 0000000000	2 nd	through Departmen	ntal ye	ears
		Pune	h Opera	lor			·]	Selection Committee	ar j	
			•	_ i [⁺ .		recognized board;	kev			
1.1	يل ال	ANT 1997	1.4.2	ven i nav	: • ! •	ii Speed of 10000.	oure			
	Sec. 19					depressions by h	Idata 1			· · ·
					· .	for punching	uaia.			
				· ·		entry/verification.		By promotion on	the	- :
	-}	7 Sen	ior Clerk		7	By promotion.		basis of seniority-c		
					· · · .			fitness from amongs	t the	•
·			· · ·					Junior Clerks will	n at 1	· · · ·
							1 N.	least five years servi	ce.	
								a) 33% by promo	otion	• •
		Q	nor Clerk		5	i. Matriculation	or	a) 370 by promi	hasis	
	· · .	8. Jui			: ' "	equivalent		amongst on the	00313	
						aualification fro	m a	of seniority-		
						recognized board	, and	fitness from amo	ingsi	
			•		•••	i A speed of 30	words	Naib Qasids or	ouner	
						ner es in ty	1	equivalent post	s m	: '

£

The Chief Minister, Khyber Pakhtunkhwa Peshawar,

PROPER CHANNEL

Through:

Subject:

REQUEST FOR PROMOTION TO THE POST OF PUBLIC PROSECUTOR BPS-18 WITH RELEVENT SERVICE BENEFIT AND SENIORITY.

Respected Sir,

- The applicant submit as under:
- 1. That being Law Graduate, 1 was appointed as prosecuting sub-inspector BPS-14 in Police Department in the month of March, 1988.
- 2. That after qualifying the requisite courses of the police department and having passed the upper course examination with credit. I was promoted to the post of prosecuting inspector BPS-16 in the year 1996.
 - 3. That I was due for promotion to the post of PDSP BPS-17, when the new Prosecution Department was established in the year 2002 and I was transferred from Police Department to Law Department and then to Home Department with designation of Deputy Public Prosecutor in the year 2003.

(Copy attached as annexure "A" and "B")

4. That I was awarded Four ACR'S (A-1) during the year 2003 to 2007 as
Deputy Public Prosecutor and I was fit for promotion to the post of Public
Prosecutor BPS-18 in the year 2007.

20 1/20

5. That under the new prosecution Act the post of Deputy Public Prosecutor was placed in BPS-17 but in violation of the above prosecution act I was deprived from the said benefit.

6. That instead of promotion as Public Prosecutor. I was demoted and my name was placed with Assistant Public Prosecutor in the seniority list of 2007. (Copy attached as annexure "C").

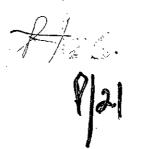
That I along with my other colleagues approached your goodself for the up gradation of the post of Deputy Pubic Prosecutor to BPS-17 and your goodself was pleased to upgrade the said post. (Copy attached as annexure "D" and "E").

That despite the fact that BPS 17 has been allotted to the post of Deputy Public Prosecutor in the Prosecution Act 2005 and your goodself has also upgraded the said post to BPS 17 but I was kept in BPS 16 and have promoted to the same post i.e. Deputy Public Persecutor in the year 2012.

That my demotion from deputy Public Prosecutor to Assistant Public

9.

Prosecutor was illegal against the nature, humanity and is against the Law



[0. That I was entitled to the promotion as public prosecutor in the year 2007.

11. That my entire record while servicing the Prosecution Department is clean

and un blemished.

12. That I am at the verge of retirement from service on attaining the age of Superannuation on 31/03/2013.

13. That I am the senior most public prosecutor amongst the rest of the public prosecutors serving in the District as District Public Prosecutor.

It is humbly prayed that in the light of afore-mentioned circumstances I may kindly be promoted to the post of Public Prosecutor with back service benefits since 2007 and my name may kindly be placed at proper place in the senjority list and obliged.

Dated: -

<u>7 / 1</u> /2013

(PARVEZ KHAN)

Deputy Public Prosecutor Swabi

1/22

linnexur

adam khan

The Chief Secretary, Khyber Pakhtunkhwa Poshawar.

Subject: PROMOTION TO THE POST OF PUBLIC PROSECUTOR BPS-18.

Respected Sir,

5.

6.

The applicant submit as under

That I have completed my twenty five (25) years service as prosecutor in Police. Law & Prosecution branch of Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar with clean & unblemished record.

That I am at the verge of retirement from service on attaining the age of supranation on 31-03-2013.

That the District Public Prosecutors namely Sahib Zada, Sakindar. Muhammad Faheem Atta Ullah Khan and so many other officers were given promotion to the next higher scale as they were on the verge of retirement. By the time there was no post of BPS-19 however these officers were promoted to next higher scale just to avail the pecuniary benefit of the pension and gratuity. (Copy of Notification is attached as A, B & C).

That Mr. Lateef Khan Assistant Public Prosecutor, who was in BPS-16 & promoted to BPS-17 at the time of his retirement inspite of the facts that he had not fulfilled the mandatory requirement for promotion in next high scale i.e the passing of the Departmental Promotion Examination. (Copy of Notification is attached as D).

That similarly Mr. Riaz UI Hassan Assistant Public Prosecutor who has recently been upgraded from BPS-14 to BPS-16 was also promoted to BPS-17 at the time of his retirement. (Copy of Notification is attached as E), and seniority list is attached as annex (F)

That there are strong precedents in this context, where in the prosecutors have been promoted to the next higher scale at verge of their retirement.

Keeping in view the above mentioned facts. It is therefore requested that the applicant is also going to be retired on dated 31-03-2013, so the case of applicant may kindly be treated as par with the above prosecutors.

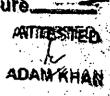
It is further requested that the case may kindly be finalized prior to the 31-C3-2013 that is the day of retirement.

Clarver a



Annexure

Government Of Khyber Pakhtunkhwa Home & Tribal Affairs Department No. SO (Pros)/HD/1-10/2012 Dated Peshawar the 15/03/2013



The Director General (Prosecution) Khyber Pakhtunkhwa Peshawar.

Subject: - PROMOTION TO THE POST OF PUBLIC PROSECUTOR (BS-18).

Dear Sir,

Kindly refer to your letter DP/E&A 1 (100)2012/2244 dated 28/02/2013 and DP/E&A 1 (100)2012/1539 dated 08/02/2013 on the subject noted above and to state that the case has already been filed as

recommended by the Directorate of Prosecution.

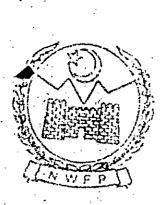
Yours faithfully,

(Khalid Akbar) 15/

Section Officer (Prosecution) Ph: # 091-9210541 Fax: # 091-9210201

Endst:of even No.& Date. Copy forwarded to the: 1. PS to Secretary, Home & Tribal Affairs Department Peshawar.

Section Officer (Prosecution)



1/24

a

COUTINE AN	Nexure
HOME & T.As. DEPART	MENT
No	

200

Dated Peshawar, the

NOTHICATION

ADAWIKAL No.SO(Prosecution)/HD/1-10/2008/Vol-IV. consultation with the Provincial Selection Board, is pleased to order the promotion of Mr Sikandar Azam Sahibzada, Public Prosecutor (BPS-18) to (BPS-19) on regular basis with effect from 11/11/2008.

> Secretary to Government of NWFP Liome & Tribal Allairs Department

> > Dated 19/11/2008.

Endst:No.SO(Prosecution)/HD/1-10/08, Mol-1M

Copy forwarded to: -

1)-The Secretary to Chief Minister NWFP, Peshawar, 2)-The Accountant General, NWFP, Peshawar,

3)-The Director General, Prosecution, XWPP, Feshawar, 4)-District Public Prosecutor, Peshawar,

5)-P.S. to Chief Secretary E.W.F.P.

6)-P.S. to Secretary Establishment Deparament. 7)-P.S. to Secretary Home & Tribal Attairs Department.

(M. Lummad Que Section Officer (Prosecution)

88

Annexure GORA (FN.W.F.P. HOME APTA No -Dated Peshawar, the -200<u>XOTHICATION.</u> No.SO(Prosecution/HD/1-10/2008/Vol-V The Competent Authority. consultation with the Provincial Selection Board, is pleased to order the promotion of the following Officers from (BPS-18) to (BPS-19) on regular basis with effect from 12/02/2009:i)-Mr.Attaullah Khan, District Public Prosecutor, Bannu, ii)-Mr. Muhammad Faheem Jan. Director(Administration). Directorate of Prosecution NWFP, Peshawar, Secretary to Government of NWEP Home & Tribal Affairs Department http://www.socution//http://www.socution//http://www.socution//http://www.socution//http://www.socution//http:// Dated 05 /03/2009. Copy forwarded to: -I)-The Secretary to Chief Minister NWFP, Peshawar, 2)-The Accountant General, NWFP, Peshawar. 3)-The Director General, Prosecution, NWFP, Peshawar, A)-The District Public Prosecutor, Banna. 5)-The District Accounts Officer, Bannu, 6)-P.S. to Chief Secretary N.W.F.P. 7)-P.S. to Secretary Establishment Department. 8)-P.S. to Secretary Home & Tribal Affairs Department. 9)-Officers concerned. Semi Avilu Brissi- P.P.Bu 14/5/09 Section Officer (

GOVERNMENT OF N.W.F.P. HOME & T.As. DEPARTMENT. ATTENTE No. Dated Peshawar, the _ DAMKHAN 200 NOTHICATION. No.SO(Prosecution)/HD/1-10/2008/Vol-IV. consultation with Departmental Promotion Committee, is pleased to order the promotion of Mr.Latif Khan, Assistant Public Prosecutor (BPS-16) of Directorate of Prosecution NWFP to the post of Deputy Public Prosecutor (BPS-17) on regular. Secretary to Government of NWFP. Home & Tribal Affairs Department. Endst: No.SO(Prosecution)/HD/1-10/03.A of-IV. Copy forwarded to: -Dated 29/11/2008 1)-The Accountant General, NWEP, Peshawar, 2)-The Director General, Prosecution, NWFP, Peshawar. 3)-The District Public Prosecutor, Peshawar. 4)-P.S. to Chief Sceretary N.W.F.P. 5)-P.S. to Secretary Establishment Department. 6)-P.S. to Secretary Home & Tribal' Affairs Department. 1. T. 18 ... ul)ammad Qa Section Officer (Prosecution)



I Ä	nnexure M
GOVERNME	NT OF N.W.F.P.
No	ADAM
Dated Peshawa	ar, the 200

NOTIFICATION.

No.SO(Prosecution)/HD/1-10/2008/Vol-V. In partial modification of this Department's Notification No. SO (Prosecution)/HD/1-10/2008/Vol-V, dated 05/03/2009, promotion of the following Officers will be with immediate effect from 05/03/2009 instead of 12/02/2009: -

R/27

i)-Mr.Attaullah Khan, District Public Prosecutor, Bannu, presently Director General, Prosecution NWFP, Peshawar.

ii)-Mr. Muhammad Faheem Jan, Director(Administration), Directorate of Prosecution NWFP, Peshawar.

> Secretary to Government of NWFP, Home & Tribal Affairs Department.

Endst:No.SO(Prosecution)/HD/1-10/08./Vol-V.

Dated 09/05/2009

Copy forwarded to: -

1)-The Secretary to Chief Minister NWFP, Peshawar.

2)-The Accountant General, NWFP, Peshawar.

3)-The Director General, Prosecution, NWFP, Peshawar.

4)-The District Public Prosecutor, Bannu.

5)-The District Accounts Officer, Bannu.

6)-P.S. to Chief Secretary N.W.F.P.

7)-P.S. to Secretary Establishment Department.

8)-P.S. to Secretary Home & Tribal Affairs Department.

Officers concerned.

Section Officer (Prosecution

D.A/M.D



GOVERNMENT OF N. W.K.P. HOME & T.As. DEPARTMENT

Dated Peshawin, the

Annexure

ATTESTED

NOTIFICATION.

"No. SO(Prosecution)/11D/1-8/2005. In terms of provisions of Rule-20 of the NWADAM KHAN Civil Servants Revised Leave Rules, 1981 and Instructions there under issued from time to time, sanction is hereby accorded to the encashment of Leave Preparatory to Retirement, equal to 180 days in favour of Mr. Latif Khan, Deputy Public Prosecutor (BPS-17). Peshawar subject to availability of leave at his credit and clearance. of financial liability.

2. In terms of Section-13 of the NWFP Civil Servants Act, 1973 he stands retired from service on 14/11/2008 (Afternoon), with retrospective effect, on attaining the age of superannuation.

> SECRETARY TO GOVERNMENT OF NWEP, HOME & TRIBAL AFFAIRS DEPARTMENT

- Endst:No.SO(Pros:)/11D/1-8/2005.

Dated 23/12/2008,

Copy forwarded to: -1)-The Accountant General, NWEP, Peshawar. 2)-The Director General, Prosecution, NWFP, Peshawar, w/r to his letter No.DP/E&A/1(51)/06/6406.dated 13/12/2008. 3)-The District Public Prosecutors, Peshawar. 4)-Officer concerned.

(Muhliminad Qasi Section Officer (Prosecuti

In the case and page 3 v



COVERNMENT OF N-W.F.P. HOME & T.As. DEPARTMENT

ATTESTED

Nu. _____

Dated Peshawar, the

NOTIFICATION.

No SO(Prosecution)/[1071-10/2008; Vol-IV. The Competent Mathority I consultation with Departmental Promotion Committee, is pleased to order th promotion of Mr.Riaz-ul-Hassan, Assistant Public Prosecutor (HPS-16) of Directorate of Prosecution NWFP to the post of Deputy Public Prosecutor (BPS-17 on regular basis with effect from 29/01/2009).

> Secretary to Covernment of NWPP Home & Triba: Affairs:Department,

> > Dated 11./02/2009

Findst: No SO(Prosecution) HOT 10 68, Vot IV.

Copy forwarded to: -

1)-The Director General, Prosecution, NWFP, Peshawar,

2)-The District Public Prosecutor, Charsadda.

3)-The District Accounts Officer Charsadda.

4)-P.S. to Chief Secretary N.W.F.P.

5)-P.S. to Secretary Establishment Department.

✓ 6)-P.S. to Secretary Home & Tribal Affairs Department.
 7)-Officer* concerned. ×

Solppis)

Section Officer Prosecution

GOVERNMENT OF N.W.P.P.	,
HOME & T.As. DEPARTMENT	ATTESTE
No	ADAM KHA
Dated Peshawar the	200

No: SO(Prosecution)(HD)1-10(2008/Vol-IV. The competent

Authority in consultation with Department/Promotion

Committee is pleased to order the Promotion of Mr. Riazul Hassan,

Assistant Public Prosecutor(BPS-16) of Directorate of Prosecution

NWFP to the post of Deputy Public Prosecutor (BPS-17) on regular

basis with effect from 29.01.2009.

Secretary to Government of NWFP Home and Tribal Affairs Deptt:

Endst. No. SO(Prosecution)(HD)/1-10/08/Vol.IV dt: 11.02.2009

Copy forwarded to :

NOTIFICATION

1. The Director General Prosecution NWFP Peshawar.

2. The District Public Prosecutor Charsadda

3. The District Accounts Officer Charsadda.

4. The P.S. to Chief Secretary NWFP

5. P.S. to Secretary Establishment Department

6. P.S. to Secretary Home and Tribal Affairs Department 7. Officer concerned.

sd/-

Section Officer (Prosecution)

Annexure.

ADAM KHAN

DIRECTORATE OF PROSECUTION NWFP

NOTIFICATION : No. DPE&A-1(49)05 dated 10th March 2007. / 976 - 1001

on 31/12/2006 received from the Police and Law departments is hereby notified as per the attached list.

or General Prosecution YTTP

tor General Prosecution

XWFP

Endst: N0 dated & even.

Copies forwarded to:

The Section officer (Prosecution) Home & Tribal Affairs Department.

All the District Public Prosecutors in NWFP for circulating the same amongst the subordinate Prosecutors.

FINAL SENIORITY LIST OF PUBLIC PROSECUTORS (BPS-18) DEPUTY PUBLIC PROSECUTORS (BPS-17) AND ASSISTANT PUBLIC PROSECUTORS (BPS-16) AND (BPS-14) AS ON 07/03/2007.

a tana ang mang mang mang mang mang mang ma							
			and the second	<u></u>	د ادر . مرجع هرچه و همین مرجع در مرجع می از این ا	Date of first	
	S.NO.	Name of officer.	Educational qualification.	Date of Birth.	District of domicile.	entry into = service on regular basis with basic pay scale.	First regular appointment to the service/cadre.
	V.	Mr. Sher Muhammad Khan	B.A.L.L.B	15/02/1949	Swat	21/01/1980	BPS-18
	12	Mr. Younis Khan Shihwari	B.Sc.L.L.B	08/08/1948	Kohat	14/11/1979	BPS-18
	3.	Mr. Attaullah Khan	B.Sc.L.L.B	01/11/1949	Bannu	<u>17/11/1979</u>	BPS-18
	4.	MrSikandar Azam Sahibzada	B.A.L.L.B	19/11/1948	Peshawar	20/05/1980	BPS-18
	5.	Mr. Muhammad Fahim Jar	¹ B.A.L.L.B	10/09/1949	Peshawar	+ 05/07/1980	BPS-18
	6/	Mr. Said Bachar Khan	B.Sc.L.L.B	12/06/1948	Mardan	03/01/1981	BPS-18
•	7./	Mr. Shah Alam Khan	. B.A.L.L.B	01/08/1947	Mansehra		BPS-18
	8/-	Miss Suriyya Jabeen	B.A.L.L.B	11/06/1948	Peshawar	11/12/1982	BPS-18
	9/	Mr. Saif ur Reiman	B.A.L.L.B	08/10/1948	Kohat	19/12/1982	BPS-18
Ó	10.	Mr. Sana Ullah Khan	E.A.L.L.B	: 01/11/1951	Tank	03/01/1977	BPS-18
\mathcal{O}	11.	Mr. Syed Facoz Shah	B.A.L.L.B	19/05/1952	Charsadda	31/10/1985	BPS-18
	12	Mir. Asmat Isa Khan	B.A.L.L.B	27/02/1952	Chitral	03/03/1978	BPS-18
	13.		: B.A.L.L.B	05/01/1953	Peshawar	13/04/1939	BPS-18
	14	Mr. Muhammad Illyas.	B.Sc.L.L.B	20/04/1956	Charsadda	15/12/1980	BPS-18
	15,	Mr. Muhammad Zaman Khan	M.A.L.L.B	25/10/1954	Dir ·	12/07/1980	BPS-18
x	16:	Mr. Muhammad Idris	B.A.L.L.B	10/03/1959	Swabi	04/10/1995	BPS-18
	10:	Mr. Muhammad Zubair Anwar	B.A.L.L.M	02/04/1960	Kohat	04/10/1995	BPS-18
Ŕ	18:		B.Sc.L.L.B	15/12/1963	Peshawar	04/10/1995	BPS-18

1/32

						8PS-18
			15/06/1960	Abbottabad	04/10/1995	BPS-18
T	19. Mr. Fakhrul Islam	B.A.L.L.B B.A.L.L.B	06/01/1966	D.I. Khan	04/10/1995	BPS-18
10	19. Mr. Fakhrul Islam 20. Mr. Muhammad Sultan Mehmeod	B.A.L.L.B	16/06/1963	Mardan	04/10/1995	BPS-18
	21 Mr Amild All Shan	B.Sc.L.L.B	10/09/1960	Gharsadda	04/10/1995	BPS-18
-	22 Mr. Sikandar Hayat	B.A.L.L.B	15/02/1963	Makand	04/10/1995	BPS-18
(14)	22 Mr. Muhammad Ibrahim	B.A.L.L.B	20/12/1959	trowshera	04/10/1995	BPS-18
	24 Mr. Amir Subhan Khattak	B.A.L.L.B	15/01/1956	C: (Lower)	25/11/1998	BPS-18
-	25. Mr. Muhammad Nawaz	B.A.L.L.B	22/03/1960	🔅 angla	4/11/1998	BPS-18
16	26 Mujarrab Khan	B.A.L.L.B	24/05/1965	Kohat	28/11/1998	BPS-18
ĺ	27. Mr. Tariq Bakhsh	B.A.L.L.B	05/03/1959	I) alakand	12/12/1992	BPS-17
	and Mr. Tai Noor	B.A.L.L.B	24/08/1948	shawar	5: /11/1993	BPS-17
l l	-)- 29: Mr. Muhammad Jalal ud Din	B.A.L.L.B	.10/04/1953	Poshawar	05/11/1998	BPS-17
	- + 30, Mr. Nasrullah Khali	M.A.L.L.B	04/10/1964	Lojure	05/11/1998	BPS-17
	at Mr. Shahzada	B.A.L.L.B	01/04/1965	Peshawar	05/11/1998	BPS-17
	32. Mr. Hafiz Muhammad Hroon	B.A.L.L.B	10/10/1965	Charsadda	05/11/1993	BPS-17
	33. Mr. Nusratullah Jan	B.A.L.L.B	31/03/1966	i Malakand	05/11/1998	BPS-17
~	34. Mr. Muhammad Arif	B.A.L.L.B	04/04/1964	T D.I.Khan	05/11/1998	1 BPS-17
	35. Mr.Saleem Muhammad	B.A.L.L.B	10/10/1966	5.1.Khan	11/01/2001	BPS-17
<i>**</i>	36. Mr. Abdul Wajid	B.A.L.L.B	12/10/1963	F.R. Bannu	09/01/2001	BPS-17 BPS-17
	35. Mr. Imtiaz-ud- Din Mansoor	B.A.L.L.B	10/07/1968	Cwabi	19/04/2002	BPS-17
	38. Mr. Gul Waris Khan	B.A.L.L.B	01/01/1957	I Swabi	30/04/2002	BPS-17
	39. Mr. Zulfiqar Ali Khan	B.AL.L.M	10/03/1966	Dir (Lower)	19/04/2002	6PS-17
	40. Mr. Sibghatullah 41. Mr. Saeed Naeem	M.A.L.L.B	04/02/1968	F.R.Bannu	09/05/2002	BPS-17
		B.A.L.L.B	01/04/1969	Dir (Upper)	19/04/2002	BPS-17
		B.A.L.L.B	15/01/1965	Kohat	30/04/2002	BPS-17
		M.A.L.L.B	20/09/1967	D.I.Khan	19/04/2002	BPS-17
	- Iohanzeh	B.A.L.L.B	25/12/1967	Peshawar	19/04/2002	
		B.A.L.L.B		Peshawar	04/04/2003	, BPS-17
		B.A.L.L.B	08/06/1967	1 Concerta		
	47. Mr. Shehzad Iqbal	:				

P/33 1 . د ۲۰

48. Mr. Qadir Baksh			. `
49. Mr. Fazal Noornai	B.A.L.L.B	05/09/1959 D.I.Khan	1110 110000
50. Mr. Arif Bilal	B.A.L.L.B	101/03/1970 Peshawar	11/C7/2003 BPS-17
51. Mr. Zahid Amin	B.A.L.L.B	23/03/1968 Peshawar	04/04/2003 BPS-17
52. Mr. Attaullah Shah	B.A.L.L.B	- 20/04/1972 Mardan	04/04/2003 BPS-17
53. Mr. Faheem Khan	B.A.L.L.B	25/11/1968 Lakki Marwatt	28/03/2003 1 BPS-17
54. Mr. Jamshed Khan	B.A.L.L.B	03/03/1969 Kohat	08/04/2003 BPS-17
55. Malik Zaheer-ud-Din Babac	M.A.L.L.B	15/08/1965 Charsadda	07/04/2003 BPS-17
	B.A.L.L.B	12/07/1968 Kohat	04/04/2003 BPS-17
	B.Sc.L.L.B	antitic	26/09/2003 BPS-17
	B.A.L.L.B	1. Consticia	23/09/2003 BPS-17
	B.A.L.L.B	1 Contawai	07/04/2003 / BPS-17
59. Mr. Saqib Sultan Jadoon	B.A.L.L.B		27/00/2003 BPS-17
60. Mr. Irshadullah	B.A.L.L.B	(Soottabau	16/09/2003 BPS-17
61. Mr. Muhammad Irshad	B.A.L.L.B		22/09/2003 BPS-17
62. Mr. Bashir Muhammad	M.A.LL.B	loc (internet of the second sec	23/09/2003 BPS-17
63. Mr. Muhammad Litaf Khan	BALLB	i a contra i	16/09/2003 BPS-17
64. Mr. Muhammad Khalid	B.A.L.L.B	logice in the second seco	24/09/2003 BPS-17
65. Mr. Rast Baz Khan	B.A.L.L.B		16/03/2003 BPS-17
66. Mr. Alamzeb	B.A.L.L.B	21/02/1959 Bannu	11/07/2006 BPS-17
67. Mr. Nawab Zarin	B.A.L.L.B	12/12/1964 Dir (Upper)	28/02/2004 BPS-17
68. Mr. Azmat Ghafoor	B.A.L.L.B	13/11/1968 F.R.Bannu	18/02/2004 BPS-17
69. Mir. Shujat Ali Khan	B.A.L.L.B	30/05/1952 Peshawar	22/12/2001 BPS-17
70. Mr. Attaullah Khan	B.A.L.L.B	01/01/1951 Swat	23/09/1983 BPS-16
71. Mr. Akbar Khan		08/09/1951 / Peshawari	
72. Mr. Rab Nawaz	B.A.L.L.B	06/05/1948 Peshawar! :	
73. Mr. Sher Zaman	B.Sc.L.L.B	22/06/1952 Peshawar	
74. Mr. Muhammad Qaiser	B.A.L.L.B	20/05/1952 Mardan	
75. Mr. Kiramatullah	B.A.L.L.B	02/12/1956 Charsadda	30/010
764 Mr. Abdur Rauf	B.A.L.L.B	02/08/1958 Lakki Manwatt	22/02/1988 BPS-16
	B.A.L.L.B	06/05/1947 Swat	01/12/1982 BPS-16
			12/10/1989 BPS-16

12

,

	77. Mr. Abdus Salam	B.A.L.L.B	06/06/1955	Swat	01/08/1987	BPS-16
	78. Mr. Zulfigar Ahmad	B.A.L.L.B	21/04/1958	Abcottabad	11/05/1991	BPS-16
	79. Mr. Muhammad Khalid	B.A.L.L.B	04/01/1954	Abbottabad	11/05/1991	BPS-16
	80. Mr. Perwaish Khan	B.A.L.L.B	14/05/1949	Buner	06/01/1992	BPS-16
	81. Mr. Mir Muhammad Shah	B.A.L.L.B	04/04/1949	Chitral	09/07/1991	BPS-16
-	82. Mr. Saeed Gul	M.A.L.L.B	18/04/1954	Hazara	29/06/1992	BPS-16
	83. Mr. Ibrahim Khan	M.A.L.L.B	20/04/1956	Swat	07/01/1992	BPS-16
	84.⊬Mr. Latif Khan :	B.A.L.L.B	15/11/1948	Peshawar	27/12/1995	BPS-16
ĺ	(8) Mr. Pervaiz Khan	B.A.L.L.B	01/04/1955	Mardan	18/04/1996	BPS-16
	86. Mr. Imran Shah	B.A.L.L.B	20/04/1959	Dir	21/09/1997	BPS-16
ļ	87. Mr. Muhammad Saleem	B.A.L.L.B	14/09/1959	M. Agency	24/09/1997	BPS-16
	88. [•] Mr. Javed Hussain	B.A.L.L.B	10/10/1961	Chitral	06/10/1997	BPS-16
	89. Mr., Muhammad Zahoor	B.A.L.L.B	05/05/1958	Lakki Marwatt	17/01/1987	BPS-16
	€ 90. Mr. Abdul Hameed Shah	B.A.L.L.B	03/08/1947	Lakki Marwatt	04/07/1994	BPS-16
	91. Mr. Abdul Shahkoor	B.A.L.L.B	06/02/1954	Mansehra	20/02/1993	BPS-16
	22. Mr. Qazi Aftab Ahmad	B.A.L.L.B	19/05/1956	Haripur	04/07/1997	BPS-16
ļ	93. Mr. Muhammad Azam Awan	B.A.L.L.B	05/12/1948	Haripur	17/10/1978	BPS-16
-	94. Mr. Abdul Hameed	M.A.L.L.B	01/04/1952	Accottabad	13/12/1997	BPS-16
	95. Mr. Muhammad Saeed	B.A.L.L.B	16/07/1949	Kohat	24/08/1983	BPS-14
· .	96.) Mr. Riaz ul Hassan	B.Sc.L.L.B	01/02/1949	Peshawar	06/12/1976	BPS-14 dui
	97. Mr. Pervaiz Ilahi	B.Sc.L.L.B	01/01/1955	Peshawar	01/07/1977	BPS-14
[98. Mr. Arbab Bashir	B.A.L.L.B	20/03/1951	Peshawar	11/07/1977	BPS-14
	99. Mr. Attiq Ur Rahman	B.A.L.L.B	07/09/1949	Feshawar	14/03/1978	BPS-14
	100 Mr. Zulfiqar Khan	B.A.L.L.B	02/04/1956	Peshawar	13/03/1988	BPS-14
	101 Mr. Jamal Khattak	B.A.L.L.B	13/04/1961	Peshawar	23/04/1988	BPS-14
	102 Mr. Muhammad Fayaz	B.A.L.L.B	01/05/1951	Malakand	06/11/1994	BPS-14
	103 Mr. Israr Ali	B.A.L.L.B	15/02/1957	Dir (Lower)	31/10/1982	BPS-14
	104 Mr. Anees Ahmad Jan	B.A.L.L.B	26/04/1958	Mansehra	29/01/1984	BPS-14
L.	105] Mr. Iltaf Hussain	B.A.L.L.B	12/02/1961	D.I.Khan	1;/09/1989	BPS-14
				· · · · · · · · · · · · · · · · · · ·		

10

2 A

•••••

31.1.2009

P/34

106 Mr. Iltaf Hussain	B.A.L.L.B	10/02/1963	Tank	17/09/1989	BPS-14
107 Mr. Abdul Sattar	B.A.L.L.B	20/11/1962	Karak	23/01/1990	BPS-14
v108 Mr. Noor-ul-Wahab	B.A.L.L.B	04/12/1948	Malakand	30/04/1978	BPS-14
109 Mr. Iltaf Hussain Akhtar	B.A.L.L.B	01/04/1962	Mansehra	01/08/1991	BPS-14
110 Mr. Murtaza Shah	B.A.L.L.B	27/01/1957	Haripur	31/07/1991	BPS-14
111 Mr. Zahoor Ahmad	B.A.L.L.B	18/02/1958	Abbottabad	31/07/1991	BPS-14
112 Mr. Muhammad Changaz	B.A.L.L.B	01/05/1982	Abbottabad	03/08/1991	BPS-14
113 Mr. Qamar Zeb	B.A.L.L.B.	21/08/1938	Peshawar	14/12/1991	BPS-14
114 Mr. Zaheer Ud Din	B.A.L.L.B	18/02/1964	Haripur	11/04/1992	BPS-14
115 Mr. Fazal Hadi	B.A.L.L.B	03/10/1960	Dir (Upper)	09/12/1992	BPS-14
116 Mr. Mir Faraz Khan	M.A.L.L.B	02/11/1867	Bannu	17/04/1993	BPS-14
117 Mr. Abdur Rashid	B.A.L.L.B	08/09/1951	Mardan	30/11/1971	BPS-14 -
118 Mr. Javid Iqbal.	B.A.L.L.B	13/05/1956	Mardan	10/04/1977	BPS-14
119 Mr. Muhammad Iftikhar	B.A.L.L.B	11/06/1949	Mansehra	01/07/1977	BPS-14
120 Mr. Muhammad Ajoon	B.A.L.L.B	06/06/1950	Mansehra	01/07/1977	BPS-14
121 Mr. Muhammad Shuaib Khan	B.A.L.L.B	08/12/1951	i Mardan	12/03/1978	BPS-14
122 Mr. Raees Khan	B.A.L.L.B	04/04/1953	Nowshera	March 1978	+ 3PS-14
123 Mr. Khurshid Anwar	B.A.L.L.B	01/07/1952	. Charsadda	01/12/1978	BPS-14
124 Mr. Shams-uz-Zaman	B.Sc.L.L.B	02/01/1952	Malakand	26/06/1980	BPS-14
125 Mr. Haroon ur Rasheed	B.A.L.L.B	03/09/1952	Haripur	25/01/1984	BPS-14
126 Mr. Muhammad Nisar	B.A.L.L.B	20/04/1955	Peshawar	11/04/1992	IBPS-14
127 Mr. Muhammad Afzal	M.A.L.L.B	01/05/1965	Chitral	18/06/1992	BPS-14
128 Mr. Muhammad Saeed	B.A.L.L.B	14/08/1962	Mardan	21/02/1993	BPS-14
129 Mr. Javed Iqbal Anwar	B.A.L.L.B	20/09/1965	Haripur	15/03/1993	BPS-14
130 Mr. Muhammad Shakeel Ahamad	B.A.L.L.B, B.Ed	02/05/1968	D.I.Khan	02/04/1999	BPS-14
131 Mr. Atta Ullah	B.Sc.L.L.B	20/08/1971	Lakki Marwatt	06/04/1999	BPS-14
132 Mr. Muhammad Nadeem	B.A.L.L.B	09/04/1969	Lakki Marwatt	06/04/1999	BPS-14
133 Mr. Hayat Ullah	B.A.L.L.B	02/01/1970	Bannu	68/04/1999	I BPS-14
134 Mr. Sher Bahadur	B.A.L.L.B	06/09/1973	D.I.Khan	0://04/1999	BPS-14

Ð

1/35

1351 Mr. Zia Ullah Wazir	B.Sc.L.L.B	26/10/1965	F.R.Bannu	08/04/1999	BPS-14
136 Mr. Khalid Khan	B.A.L.L.B	10/02/1969	Swabi	10/04/1999	BPS-14
1371 Mr. Tasawar Hussain	B.A.L.L.B	01/04/1970	D.I.Khan	02/04/1999	BPS-14
138 Mr. Aman Ullah	M.A.L.L.B	19/12/1966	Bannu	08/04/1999	BPS-14
139 Mr. Muzaffar Ahmad	B.A.L.L.B	19/01/1968	Dir (Lower)	05/04/1999	BPS-14
140 Mr. Syed Falak Sair	B.A.L.L.B	05/12/1964	Dir (Upper)	06/04/1999	BPS-14
141 Mr. Javed Rehman	B.A.L.L.B	02/09/1965	Mardan	05/09/1999	BPS-14

. L

Director General Prosecution NWFP

P/36

٠

 (\cdot)

22

TREBUNAL PESHAWAR **BEFORE THE SERVICE**

Service Appeal No.912/2013 Amended

Parvez Khan

Vs

The Chief Secretary etc.

INDEX				
S.No	Description of Documents	Annex	Pages	
1.	Appeal with index and Affidavit		1-9	
2.	List of Books		10	
3.	Memo of Addresses		11	
4.	Result of Examination	A	12	
5.	Letter dated 15.09.2003	B ·	13	
б.	Letter dated 27.09.2004	C	14-16	
7.	Notification dated 24.09.2005	D	17-20	
8.		Ε	21-22	
9.		F&G	23-26	
	22.02.2013.			
10	Letter dated 15.03.2013	H	27	
11	Letters dated 19.11.2008,	I to N	28-33	
	05.03.2009,		**	
	29.11.2008, 09.05.2009,			
	23.12.2008 & 11.02.2009.		```	
12	Seniority list dated 10.03.2007	0	34-40	
	Vakalat Nama		41	
· •••			~	

Appellant

Onen (PARVEZ KHAN)

Annexistes are already attached with the original case

Through:

Muhammad Adam Khan Advocate, Mardan.

BEFORE THE SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.912/2013 (Amended)

Parvez Khan, The Deputy Public Prosecutor, Swabi (Resident of Village Kalu Khan District Swabi).

(Appellant)

VERSUS

- 1. The Govt. of KPK through The Chief Secretary, Province of KPK, Peshawar.
- 2. The Secretary, Home and Tribal Affaires, KPK Peshawar.
- 3. The secretary Establishment and Administration Department KPK, Peshawar.
- 4. The Secretary, Finance Department, Government of KPK Peshawar.
- 5. The Director General, Prosecution Department, KPK Peshawar.

(Respondents)

Service Appeal U/S-4 of Service Tribunal Act, 1974.

FACTS

1. That the Appellant being the Law Graduate, was appointed

as

Prosecuting Sub-Inspector (BPS-14) in the Police Deptt: in

the of Month of March 1988.

2. That the Appellant was promoted as Prosecuting Inspector (BPS-16) in 1996, after qualifying the requisite departmental course including the Upper Course Examination with credit, in 1989.

COPY ANNEXURE 'A'.

3. That the Appellant was due for promotion to the post of PDSP

(BPS-19), when the Prosecution Deptt: was established in

year 2002.

4. That resultantly the Appellant alongwith other employees of the

Prosecution Branch was transferred to Law department and thereafter, to the Home Deptt: in the year 20**0**3 and the \mathcal{N} Appellant was designated as Deputy Public Prosecutor.

COPIES ARE ANNEXURE 'B' & 'C':

5. That the post of the Deputy Public Prosecutor_was placed in BPS-17.

6. That the Appellant along with his other colleaguesapproached

The Government of KPK / The Chief Minister for the upgradation of the post of the Deputy Public Prosecutor to BPS-17, which was accepted vide Notification dated 24.09.2003.

COPIES ANNEXURE 'D'.

7. That inspite of up gradation of the post of the Deputy Public Prosecutor to BPS-17, the Appellant was deprived therefrom and he was kept in BPS-16.

8. That the Appellant after passing the Departmental Examination

in 2012 was again ordered to the promotion as The Deputy Public Prosecutor in the year 2012, inspite of the fact that he had already been posted as such in the year 2003.

9. That the Appellant represented for the restoration of his designation and salary as The Deputy Public Prosecutor (BPS-17)

vide application dated 07.01.2003, and on the alternate, for \mathcal{N}

COPY ANNEXURE 'F'

10. That being at the verge of retirement i.e, on 31.03.2013, the Appellant submitted another Application dated 20.02.2013,

to

Respondent No.1, for the aforesaid purpose.

COPY ANNEXURE 'G'

11. That the Secretary / Respondent No.2, rejected both the aforesaid applications on 15.03.2013.

COPY ANNEXURE 'H'

12. That a number of the employees of the Prosecution Department are granted promotion in the higher pay scales at the time of their retirement from service. But , the Petitioner is discremented in this respect.

GROUNDS

A. That the Appellant has completed twentyfive (25) years service

in Police Department, Law Department and Prosecution Branch

of Home and Tribal Affairs, Department, Khyber Pakhtoonkhwa,

Peshawar with clean and unblemished records.

B. That Appellant. at the time of institution of the Writ Petition,

was at the verge of retirement from service on attaining the

age

of superannuation on 31.03.2013.

C. That the District Public Prosecutors namely, SahibZada Sakindar,

Muhammad Faheem, Attaullah Khan and so many other officers

were given promotion to the next higher scale just to avail the pecuniary benefits of the pension, in the higher scale.

<u>COPY OF NOTIFICATION IS ATTACHED AS ANNEXURE</u>

D. That Mr. Lateef Khan Assistant Public Prosecutor, who was

in.

BPS-16 was promoted to BPS-17 at the time of his retirement

inspite of the facts that he had not fulfilled the mandatory requirements for promotion in next high scale i.e, the passing of the Depart- mental Promotion Examination.

COPY OF NOTIFICATON IS ANNEXURE- 'M'.

E. That similarly Mr. Riaz ul Hassan Assistant Public Prosecutor

who had recently been upgraded from BPS-14 to BPS-16 was

also promoted to BPS-17 at the time of his retire- ment.

COPIES ARE ANNEXURE 'N' TO 'O'.

- F. That beside the accrued right of restoration of promotion post, the Petitioner is entitled to the similar and equal treatment as granted to the other afore- mentioned colleagues.
- G. That the Appellant being at the verge of retirement on
 31.03.2013 had no other expeditions and adequate remedy.
 Hence, he approached the High Court in Writ Petition, which

was converted into service appeal.

H. that the Appellant seeks leave of this Hon'ble Tribunal to claim

further ground also.

It is prayed that on acceptance of this appeal, the Respondents may be directed to grant the promotion benefits to Appellant as The Deputy Public Prosecutor with the relevant financial benifits from the year 2003, with the relevant of Pausian.

The costs of this Appellant may also be awarded in favour of Appellant against the Respondents.

Appellant: (PARVEZ KHAN)

Through:

Muhammad Adam Khan Advocate, Mardan.

Dated:30.03.2013

Amended on 24.12.2013.

BEFORE THE SERVICE TREBUNAL PESHAWAR

Service Appeal No.912/2013 (Amended)

Parvez Khan

V/S

The Govt. of KPK etc.

<u>AFFIDAVIT</u>

I, Parvez Khan resident of Village KaluKhan District Swabi/the appellant, do hereby state on solemn affirmation that the contents of the accompanied appeal are true and correct to the best of my knowledge and belief and that nothing is concealed from this Honorable Tribunal, in this respect.

Identific Fr.,



Deponent PERVEZ KHAN

BEFORE THE SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.912/2013

Pervez Khan

The Govt. of KPK etc.

Memo; of addresses:

APPELLANT:

Parvez Khan, The Deputy Public Prosecutor, Swabi (Resident of Village KaluKhan District Swabi).

RESPONDENTS:

1. The Govt. of KPK through Chief Secretary Province of KPK Peshawar.

2. The secretary , Home and Tribal Affairs, KPK, Peshawar.

3. The Secretary Establishment and Administration Department, KPK, Peshawar.

4. The Secretary, Finance Department, Govt. of KPK, Peshawar.

5. The Director General, Prosecution Department, KPK Peshawar.

APPELLANT

(PARVEZ KHAN)

Through

MuhammadAdamKhan Advocate Mardan.

MUHAMMAD ADAM KHAN B.A LLB Advocate High Court Mardan

BEFORE THE PESHAWAR HIGH COURT PESHAWAR Service 912 oppee 2013 W.P. No. 1019_P 12013

v/s

Parvez Khan

The Chief Secretary etc.

	INDEX		
S.No.	DESCRIPTION OF DOCUMENTS	ANNEXURE Nos.	PAGE Nos. From B
			
1.	Petition, Certificate and Affidavit		01 - 10
2.	List of Books	-	11
3.	Memo of Addresses	-	12
4.	Result of Examination	A	13
5.	Letter dated 15.09.2003	В	14
6.	Letter dated 27.09.2004	Ċ	15 –17
7.	Notificatioo dated 24.09.2005	D	18 –21
8.	Notification dated 10.6.2011	E	22 - 23
9.	Applicantions dated 7.1.2013 and 22.2.2013	F&G	24 - 27
10.	Letter dated 15.3.2013	H to.	* 28 - 3 A
<i>)</i>] .	Letter dated 19.11.2008, 5.3.200 29.11.2008, 09.05.2009, 23.12.20 11.2.2009		v 29 - 34 A
1 9.	Senirity list dated 10.3.2007	0	35 - 41
13.	Court Fee Stamp Worth Rs.500/00	-	24-49
14.	Vəkələt N _{əmə}	-	45
	TotaL:	·	. 435
	_ _	Petitions	
2013	(P	arvez Kha	n
	Through:	A.	·
rt Suo-Re	egisuy,	Jun	

Incharge, Peshawar High Court Sub-Registry, Mardan.

3 0 MAR

Filed today.

Dt; 30.3.2013.

Muhammad Adam Khan Muhammad ADAM KHAN Advocate Mardan. B.A. LLB Advocate HIGH Court MARDAN

BEFORE THE PESHAWAR HIGH COURT PESHAWAR Service oppend No. 912 W.P. No. 1019-P /2013

Parvez Khan, The Deputy Public Prosecutor, Swabi

(Resident of Village Kalu Khan District Swabi).

(Petitioner)

VERSUS

- 1. The Govt. of KPK through The Chief Secretary, Province of KPK, Peshawar.
- 2. The Secretary, Home and Tribal Affairs, KPK,

Peshawar.

3. The Secretary Establishment and Administration Department KPK, Peshawar.

4. The Secretary, Finance Department, Government

of KPK Peshawar.

5. The Director General, Prosecution Department, KPK Peshawar.

day.

0 MAR 2013

h Court Sub-Registry,

Page-2

WRIT PETITION UNDER ARTICLE -199 OF THE !

CONSTITUTION OF THE ISLAMIC REPUBLIC OF

PAKISTAN 1973.

FACTS

 That the Petitioner being the Law Graduate, was appointed as Prosecuting Sub Inspector (BPS-14)
 in The Police Dptt: in the month of March 1988.

2. That the Petitioner was promoted as Prosecuting

Inspector (B-16) in 1996, after qualifying the requisite departmental course including the

COPY ANNEXURE 'A'

3. That the Petitioner was due for promotion to the

post of PDSP(B-17), when the Prosecution Deptt:

Filed today.

Ν

was established in the year 2002.

3 0 MAR 2013

Incharge, Peshawar High Court Sub-Registry, Mardan Page-3

4.	That resultantly the Petitioner alongwith other
	employees of the Prosecution Branch was transferred
	to Law department and thereafter, to the Home Deptt:
	in the year 2003 and the Petitioner was designated
	as Deputy Public Prosecutor.
	COPIES ARE ANNEXURE 'B' & 'C'
5.	That the post of the Deputy Public Prosecutor
	was placed in BPS-17.

6. That the Petitioner alongwith his other colleagues approached The Government of KPK / The Chief Minister for the up-gradation of the post of TheDeputy Public Prosecutor to BPS-17, which was accepted vide

Notification dated 24.09.2005.

COPIES ANNEXURE 'D

7. That inspite of upgradation of the post of The

Filed today.

2

3 0 MAR 2013

was deprived therefrom and he was kept in BPS-16.

Deputy Public Prosecutor to BPS-17, the Petitioner

Incharge, Peshawar High Court Sub-Registry, Mardai. 8. That the Petitioner after passing the Departmental

Examination in 2012 agains was ordered to the

promotion as The Deputy Public Prosector in the

year 2012, inspite of fact that he had already

been posted as such in the year 2003 .

COPY ANNEXURE 'E'

9. That the Petitioner represented for the restoration.

of his designation and salary as The Deputy Public

Prosecutor (BPS_17) vide application dated 07.1.2013, and on the alternate fromotion, as such.

COPY ANNEXURE 'F'

10. That being at the verge of retirement i.e, on

31.03.2013, the Petitioner submitted another

application dated 22.02.2013 to Resondent No. 1,

for the aforesaid purpose.

COPY ANNEXURE 'G'

Filed today.

3 0 MAR 2013

Incharge, Peshawar High Court Sub-Registry, Mardan 11. That the Secretary / Respondent No. 2,

rejected both the aforesaid applications on 15.03.2013.

COPY ANNEXURE 'H'

12. That a number of the employees of the

is discremented in this respect.

Prosecution D_e partment are granted promotion in the higher pay scales at the time of their retirement from service. But, the Petitioner

GROUNDS

i.

That the Petitioner has completed twentyfive (25)

years service in Police, Law and Prosecution

Branch of Home and Tribal Affairs, Department,

Khyber Pakhtoonkhwa, Peshawar with clean and

unblemished records.

Filed today.

℃ 3 0 MAR 2013

Incharge, Peshawar High Court Sub-Registry, Mardau.

II. That Petitioner is at the verge of retirement

from service on attaining the age of supranuation

on 31.03.2013.

III. That the District Public Prosecutors namely Sahib Zada. Sakindar, Muhammad Faheem, Attaullah Khan and so many other officers were given promotion to the next higher scale, when they attained the ageof supranuation. By/the/time here was no post of BPS-19. Mowever, these Officers were promoted to next higher scale just to avail the pecuniary benefit of the pension. and-grotuity. A COPY OF NOTIFICATION IS ATTACHED AS ANNEXURE 'I' TO 'I

IV.

COPY OF

That Mr. Lateef Khan Assistant Public Prosector, who was in BPS-16 was promoted to BPS-17 at the time of his retirement inspite of the facts that he had not fulfilled the mandatory requirement for promotion in next high scale i.e; the passing of the Departmental Promotion Examination.

IS ANNEXURE

Filed today.

3 0 MAR 2013

Incharge, Peshawar High Court Suo-Registry, Mardan. Page-6

That WE similarly Mr. Riaz ul Hassan Assistant

upgraded from BPS-14 to BPS-16 was also

promoted to BPS-17 at the time of his retirement.

COPIES ARE ANNEXURE 'N' AND O'

Page-7

(V)

(VI) That besides the accrued right of restoration of promotion post, the Petitioner is entitled to the similar and equal treatment as granted

to other aforementioned colleagues.

(VII) That the Petitioner being at the verge of

retirement on 31.03.2013 has no other expeditious

and adequate remedy.

(VIII) That the Petitioner seeks leave of this Hon'ble

Court to claim further grounds also.

Filed today.

3 0 MAR 2013

Incharge, Peshawar High Court Sub-Registry, Mardan Contd...8/-

Page-8

It is prayed that this Honourable court

may graciouly be pleased to issue the writ,

directing the Respondents to restore the promotion

benefits to the Petitioner as The Deputy Public

Prosecutor with relevant service benefits effective

from the year 2003.

The costs of this Petition may also be awarded

in favour of Petitioner against the Respondents.

Petitioner 10-(PARWEZ KHAN)

Through

Advocate.

Muhammad Adam Khan

Dt; 30.03.2013.

MUHAMMAD ADAM KHAN B.A LLB Advocate High Court Mardan

Filed today.

2013 t Sub-Registry, 9

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

W.P. No. 1019-P/2013

Parvez Khan V/s The Govt. of KPK etc.

CERTIFICATE

As per information furnished by my client, no such Wirt Petition on the same subject matter

has earlier been filed before this Honourable

court.

dt;30/03/2013

Muhammad ADAM KHAN B.A. LLB Advocate HIGH Court MARDAN Mahammad Adam Khan

Advocatte High Court

District Courts Mardan.

AR 2013

burt Sub-Registry,

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

10

W.P. No. 1019-P/2013

Parvez Khan Vs The Govt. of KPK etc.

AFFIDAVIT

I, Parvez Khan, The Petitioner resident of Village Kalu Khan District Swabi do hereby state on solemn affirmation that the accompanied Writ Petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

Dt; 30.3.2013.

PERVEZ KHAN (Deponent)

Nic No. 16202 2739346-5

No:...9/.... Certified that the above was verified on solemnly \$10......Fit Who is personally known to me Oath com Peshawar High Court, Sul-Rigistry, Mardan

HIGH COUR MARDAN

2013

Sub-Registry,

Filed today.

PNQ-11

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

/2013 W.P. No.

Parvez Khan V/S The Govt. KPK etc.

LIST OF BOOKS

1. The Constitution of Islamic Republic of

Pakistan 1973.

2. The Prosecution Act.

3. Any other law book or judgement deemed

' relevant.

Petitioner (Parvez Khan

Throughluhammad Aller ADAM KHAN B.A. LLB Advocate HIGH Court MARDANs Muhammad Adam Khan

Advocate

dt; <u>30/03/2013</u>

Mardan.

Filed today.

0 MAR 2013

igh Court Sub-Registry,

12.

Page-2

BEFORE THE PESHAWAR HIGH COURT PESHAWAR -----

W.P. No. /2013

Parvez Khan

Vs The Govt. KPK etc.

PETITIONER

Parvez Khan, The Deputy Public Prosecutor, Swabi (Resident of Village Kalu Khan District Swabi.

RESPONDENTS

Dt; <u>30/03/2013</u>.

- 1. The Govt. of KPK through The Chief Secretary Province of KPK Peshawar.
- 2. The Secretary, Home and Tribal Affairs, KPK Peshawar.
- 3. The Scretary Establishment and Administration Department, KPK Peshawar.
- 4. The Secretary, Finance Department, Govt. of KPK Peshawar.
- 5. The Director General, Prosecution Department, KPK, Peshawar.

Petitioner

(Parvez Khan) ThroughMuhammad арам кнай Advocate B.A. LLB H<u>GH Court MARDAN</u> MUHAMMAD ADAM KHAN

Advocate Mardan.

Filed today.

3 0 MAR 2013

Incharge, neshawar High Court Sub-Registry,

lan.

Annexure ATTIASTE PO1 ADAM KHAN AINII $\overline{}$ -|[)Δ[SCHOOL HISTORY SHEET PROSECUTING YOB-IN PECTORS COURSE. Jaisles SIO Amir Zada Lela awabi DISTRICT TRAINING PERIOD 7-1-89 TO 29-6-8 MARKS A: LAW SUBJECTS Total Obtained Leave availed P.P.C 1. 100 87 Overstay Leave 2. Cr. P.C. 100 85 Evidence Act. 3. 50 Absent w/o Leave L.S.L. with Books 4. 100 84 Sick Report without 5. L.S.L. 100 Books Punishraent Police Rules. 6. 100 Rewards 7 P.P.W. 100 8. Med-Juris Prüdence 100 U 9 Finger Prints 83 100 GEMERAL OBSERVATIONS. 10 Scientific Aids. 3 50 Hard worling and a efficient officer. He tool desided interest in his ter Security: 11. **...** : Plan Drawing. 2. 83 50 13. Uslamiat. 143 100 14 Memo Writina 100 66 63 15 Oral Speech 100 16. . : Total. 95 .1250 B. DRILL SUBJECTS 3 Drill ÷ 110 2Musketry 150 😤 Total, \$ 260 CONDUCT. 100 85 GRAND TOTAL 10) 9 C 1610 A, B & C OVER ALL : 6.33 PERCENTAGE 2145.61 Kulk - Credit ASSED -NEW CONTRACT (MAMER ALT VER OF -12[1]] (U 2. FRINGPAR

(*fird-Police*). TRAINING

øf marenews SCHOOL

13

POLICE

SHAHDADPUR

SCHOOL HISTORY SHEET

PROSECUTING S

÷

SUB INSPECTORS COURSE

NO. RANK PST NAME PERVEZ KHAN S/O AMIR ZADA KHAN

BETTER COPY

DISTRICT SAWABI

TRAINING REFIOD: 07.01.1939 TO 29.6.1989

				Q
Α.	LAW SUBJECTS	MARKS TOTAL	OBTAINED	
1.	P.P.C.	100	87	Leave availed
2.	Cr.P.C.	100	85	SOverstay Leave
3.	Evidence Act	50	41	Absent w/o leave
4.	LS.L. with Books	100	84	<u> </u>
5.	L.S.L without Books	100	74	Sick Report
6.	Police Rules	100	77) (Punishment
7.	P.P.W.	100	79	
8.	Med Juris Prudence	100	74	Rewards
9.	Finger Prints	100	83	
10.	Scientific Aids	50	31	
11.	Security	-		
12.	Plan Drawing	50	34	GENERAL OBSERVATIONS
13.	Islamiat	100	79	
14.	Memo Writing	100	66 🖞	Hard working and an effient
15.	Oral Speech	100	63	Officer . He took desired
16.	***	_	— Q	
	Total:	1250 .	957 X	interest in his training.
(B)	DRILL SUBJECTS		ý (\mathbf{A}
1.	Drill	110	70 8	
5.	Musketry	150	117	Sd/-
	Total	260	187 8	
(C)	CONDUCT	100	85 N.	(MAZHAR ALI SHAH)
	GRAND TOTAL		8	PRINCIPAL
,	A, B & C	1610	1229 🖞	
	OVER ALL PERCENTAGE	76.33		
	PASSED/Enico	76.33 with ce	edit N,	

ORDER OF MERIT.

M

3

GOVERNMENTARY AFFAIRE & HUMAN PARLIAMENTARY AFFAIRE & HUMAN RIGHTS DEPARTMENT.

DATED DESHAWAR THE /2003.

ORDER.

NOIDE-01(11)2002/KCI- Consequent upon bis arrival of Mr. Perver Khon, Pronocution Inspecter, is hereby peeted as Deputy Public Pronocutor, Swabi, with immediate

affact.

n...

3-

[].au

5-

6...

7-

8...

SECRETARY TO GOVTO OF MAFP. LAN DEPARTMENT.

anexure.

ATTESTED

ADAMTCHAN

ENDST. NOIDP-01(11) 2002/KC/ 3263-74 DATED 15/ 9/2003. Copy of the above is forwarded tor-

The Distinccounts Officer, Swable The Senter Civil Judge, Swable The Fublic Prosocutor, Swable The Fublic Prosocutor, Swable The P.S to SecysTo Govier NWFP, Law Depits The Section Officer (Prescution) FRTAN Depit for information.

The Officer concerned. The P/File of the Officer concerned. The Accountant "Lit: Coll" Law Department,

WORMA DIRECTOR PROSECUTION

IDERTON PROMINES

GOVERNMENT OF NWFP

/2003

TED

ADAM KHAN

PARLIAMENTARY AFFAIRS & HUMAN RIGHTS DEPARTMENT

COPY

Dated Peshawar the

ORDER

LAW

NO:DP-01(11)2002/KC:- Consequent upon his arrival of Mr. Pervez Khan Proseuction I spector, is hereby posted as Deputy Public Prosecutor, Swabi with immediate effect.

> Secretary to Govt. of NWFP LAW DEPARTMENT

NO. DP-01(11)2002/KC/3963-70 DATED 15/09/2003 ENDST.

COPY OF THE ABOVE IS FORWARDED TO :-

- The Distt: Accounts Officer, Swabi. 1.
- 2. The Senior Civil Judge, Swabi.
- The Public Prosecutor Swabi " 3.
- 4. The P.S. to Secy. To govt. of NWFP Law Deptt:
- The Section Officer (Prosecution) H& TAB Dept: 5. for information.
- The Officer concerned 6.
- The P/File of the Officer concerned. 7.
- The Accountant "Lit:Cehl' Law Department. 8.

Sa/-DIRECTOR PRSOBECUTION NWFP LAW DEPARTMENT

GOVERNMENT OF N.W.F.P, LAW, PARLIAMENTARY AFAIRS AND HUMAN RIGHTS DEPARTMENT, PESHAWAR

Dated Peshawar the 27/09/2004.

ADAM

AN

Anneache

NOTIFICATION.

П

1.

2.

3.

4.

5.

6.

7.

No.E&A(LD)6-387/2003: - Consequent upon the separation of Prosecution in pursuance of Establishment Department (Regulation Wing) notification No. SO (O&M)E&AD/2-11/2002 dated 17/03/2004, the following Public Prosecutors, Additional Public Prosecutors, Deputy Public Prosecutors, Assistant Public Prosecutors, and Ministerial Staff from Mufassil Establishmet Law Department are hereby relieved and rendered their services to the N.W.F.P, Home Department with immediate effect.

PUBLIC PROSECUTORS

	1 2	Mr. Sher Muhammad Khan			17,	Mr. M.A.
	3	Mr. Younus Khan Shinwari			18.	Mr. Muhammad Ilyas Khàn Mr. Muhammad Ilyas Khàn
	4	Mr. Attaullah Khan	· .		19,	Mr. Muhammad Zaman Khai
•	5	Mr. Abdul Qyoum Khattak Mr. Mushtaq Ahmad		•	20.	Mr. Muhammad Idrees Khan Mr. Muhammad Zubair
	6, '	Mr. Sikandar Azam	· .			Anwar
		Sahibzada	:		21.	Mr. Bilal Muhayudin
•	7.	Mr. Abdul Mueed Khan	, ·		22.	Mr. Fakhrul Islam
•	8	Mr. Muhammad Faheem Jan	· ·	· · ·	23.	Mr. Muhammad Sultan
9). '	Mr. Said Bashar Khan	•			Mehmood
1	10.	Mr. Shah Alam Khan	ì		24.	Mr. Amjad Ali
. 1	1.	Miss Surriya Jabeen		• •	25	Mr. Sikandar Havat Khan
1	2.	Mr. Saif-ur-Rahman Khan			26.	Mr. Muhammad Ibrahim
	3.	Mr. Sanaullah Khan			27	Mr. Amir Subhan Khattale
- 1	4	Sycd Ferooz Shah			9	Mr. Muhammad Nawaz Khan
	5	Mr. Asinat Isa Khan			29	Mr. Mujarrab Khan
-(1	<i>6)</i> .	Mr. Muhammad Akram Khan			5 0, ,	Mr. Tariq Bakhsh
7					31.	Mr. Taj Noor Khan

aj Noor Khan

ADDITIONAL PUBLIC PROSEC

•

Mr. Alamzeb Mr. Liagat Ali Mr. Raza Khan Mr. Muhammad Younas Mr. Ghulam Mustafa Mr. Zafar Abbas Mirza Mr. Nisar Alam Mr. Attaur Rahman

DEPUTY PUBLIC PROSECUTO

$\{ j, 1, \dots \}$	Mr. Akbar Khan	13.	X4 . 1
2.	Mr. Qisar Khan		Mr. Abdus Salam
3.	Mr. Attaullah Khan	14.	Mr. Shujat Ali Khan
14	Mr. Rabnawaz Khan	15.	Mr. Ibrahim Khan 🔄 🔛
(5.)	Mr. Sher Zaman	16.	Mr. Abdul Hameed Shah
6	Mr. Pervaiz Khan	17.	Mr. Muhammad Azam Awan
7.	Mr. Rast Baz Khan	18	Mr. Muhammad Khalid
8.	Mr. Muhammad Zahoor	19	Qazi Aftab Ahmad
9	Mr. Kiramat Ullah	20	Mr. Abdul Shahkoor
10,	Mr. Imran Shah	. 21	Mr. Javed Hussain
•			

ASSISTANT PUBLIC PROSECUTORS

		A. 4
1.	Mr. Muhammad Saeed	
2	Mr. Zulfiqar Khan	
3	Mr. Pervaiz Hahi	
4	Mr., Attiq-ur-Rahman	
5	Mr. Riaz Hussain	÷
6	Mr Arbab Bashir	•
7	Mr. Muhammad Nisar	·
8.	Mr. Jamal Khattak	
9.	Mr. Fazli Hadi	1.1
10	Mr. Muhammad Shuaid Kl	ian .
11.	Mr. Noor-ul-Wahab	
12.	Mr. Zia Ullah Wazir	•
13.	Mr. Aman Ullah	
14.	Mr. Hayat Ullah	
15	Mr. Atta Ullah	
16.	Mr. Sher Bahadur	
17.	Mr. Tasawar Hussain	
18.	Mr. Muhaminiad Shakeel	
	Ahmad	· · · .

MINISTERIAL STAFF

Mr. Munir Alam, Assistant Mr. Said Habib, Assistant 2

JUNIOR CLERKS

1. Mr. Muhammad Ghaffar Mr. Dilshad Khan 2 3) Mr. Magsood Ali 4. Mr. Sher Ali 5. Mr. Ashraf Din 11. Mr. Khan Azad

12. Mr. 'Abdul Sattar Khan 13. Mr. Shah Faisal 14. Mr. Ghulam Habib 15. Mr. Bashir Ahmad 16. Mr. Hidayat Ullah 17. Mr. Muhammad Tariq 18. Mr. Haider Ali 19. Mr. Muhammad Gulzar Ali 20. Syed Nazmat Ali Shah 21. Mr. Muhammad Hamayoon 22. Mr. Qamar Zaman 23. Mr. Shakeel Akhtar: 24. Mr. Muslim Khan 25. Mr. Sikandar Hayat 26) Mr. Mubarak Ahmad 27. Mr. Muhammad Iqbal 28. Syed Abu Ubaida 29, Mr. Shahid Gul 30. Mr. Mumraiz Khan 31. Mr. Sahibzada

Mr. Mustafa Kamal 19. Mr. Iltaf Hussain 20. Mr., Ances Ahmad Jan 21. Mr. Muhammad Ayaz-22. Mr. Umar Farooq 23. Mr. Murtaza Shah 24. Mr. Changiz Khan 25. Mr. Muhammad Arshad 26. Khan Mr. Muhammad Iftikhar 27. Mr. Shams-uz-Zaman 28. Mr. Khurshid Anwar 29. Mr. Muhammad Ajoon 30. Mr. Muhammad Afzal 31. Mr. Muhammad Nadeem 32.

35. Mr. Abdul Rasheed Mr. Muhammad Khalil 36.

33.

34.

3.

Mr. Hazrat Ali Shah

Mr. Abdul Hameed

Mr. Niamat Ullah, Steno Typist

Mr. Muhammad Iqbal Mr. Habibullah Jan Mr. Magsood Ahmad 9. Mr. Tariq Hussain 10. Mr. Hukmat Khan 32. Syed Hakeem Shah 33. Syed Ibrar Shah 34. Mr. Abdul Wahid 35. Mr. Muhammad Arshad: 36. Mr. Sakhawat Shah 37. Malik Rahmant Ali 38. Mr. Aimal Khan-39 Mr. Muhammad Ali 40. Syed Alam Shah 41. Mr. Musawir Jan. 42. Mr. Yaqoob Khan 43. Mr. Muhammad Yousaf 44. Mr. Muhammad Arif 45. Mr. Khurshid Anwar 46. Mr. Aurangzeb 47. Mr. Muhammad Rizwan (48)Mr. Muhammad Ali 49. Mr. Fida Muhammad 50. Mr. Hazrat Muhammad 51, Mr. Khirullah Jan 52. Mr. Muhammad Saced Mr. Mohammaid Anshe

and realizable distinguist	and the second state of the second	ALL DESCRIPTION OF		. Martine Contraction	<u>1977</u>	No. of a
	P.K.	γ			熱營輸被	
	1/192	25.	Mr. Zarshad	建建能	這些時世	
1.	Mr. Sami Ullah		Mr. Abdur Rahim		影影響	
2.	Mr. Imdad Khan	~26)	Mr. Shakir Ullah		新新設施	
3.	Mr. Muhammad Amin	201		這關握	作品画	机械的 是
4.	Mr. Sabz Ali	- <u>28</u> -	Mr. Muhammad	: 19-9 1	的影響	新教室 的中
5	Mr. Zaiwar Shah	(5)	Anwar Mr. Jamshid Khan			
<i>,</i> 6.	Mr. Fazli Rabi	- (299		15	フトネ	
7.	Mr. Arshahd Muneer		Mr. Abdullah Khan	,	2010 藤	
8.	Sufi Abdur Rahim		Mr. Yasin Khan •)	•	a	小 古外的名词
9.	Mr. Mehraban Shah	150	Mr. Juma Khan		i.	ji e ji ji
10.	Mr. Muhammad	1 33	Mr. Ain-ul-Haq			
	Ashraf	' 34.	Syed Nawab			
11,	Mr. Anwar Khan	35.	Mr. Bakhat Pervaish			2
.12	Mr. Ikram Ullah	36.	Mr. Habib Gul			2
13.	Mr. Sher Rahman	37.	Mr. Imran Khan		· · · ·	•
14	Mr. Asghar Ali	38			· · ·	
15.	Mr. Muhammad	39.	Mr. Farmanullah	· .		
	Saleem	40	Mr.Khista Rahman			۰. ۲
16,	Mr. Zahoor Ahmad	· 41.	Mr. Subhan Ullah	•	-	
17.	Mr. Yasir Khan	42.	Mr. Humayoon			
18.	Mr. Rambail Khan	. 43.	Mr. Asfandyar Gul			
19.	Mr. Ikram Ullah Khan	44.	Mr. Abdul Majid			
20.1	Mr. Younas Khan	· 45,	Mr. Abul Salam			
.21.	Mr. Israil	46.	j Mr. Muhammad	· ·		•
22.	Mr. Guldad		Yahya		۰.	• • •
23.	Mr. Sartaj Khan	47.	Mr. Jamshid Ahmad	•		
24:	Mr. Abdul Salam	48.	Mr. Pir Said		:	-
			Mr. Nazim Ali	• •		•
49.	Mr. 1kram Ullah	62.				
50.	Mr. Ismail	63.				
51	Mr. Haider Ali	. 64.		•		
52.	Mr. Nasir Ali	65.		· ·		:
53.	Mr. Sair Zahab	66. (7	سيترب المتعادين المتعادين والمتعادين والمتعاد	,].	· .	· ·
54,	Mr. Wali-ur-Rahman	67.		•		
55.		68.	-	,	a i	
	Shah	69.		• • •		
· 56.	Mr. Muhammad	70	-		÷	
201	lshfaq	. 71		• •		
57		. 72				
	Hassan		Rustum		1 I	
58.		73				
5.9.		74			•	
. 60	· · · · · · · · · · · · · · · · · · ·	75	Mr. Norooz Khan	•		
61				i -		
. 01	JINI A MARINE PERS					

(AMIR GULAB KHAN)

SECRETRY TO GOVERNMENT OF NWFP, LAW, PARLIAMENTARY AFAIRS AND HUMAN RIGHTS DEPARTMENT, PESHAWAR.

Endst.No.E&A(LD)6-387/2003/4113-4433

DATED 27/09/2004.

SECTION OFFICER (GENERAL) LAW DEPÁRÌMENT

「「「「「「「「「」」」」

Copy of the above is forwarded to:-

- 1. All the Administrative Secretaries, N-W.F.P
- The Secretary to Governor, N-W.F.P. 2.
- The Secretary to Chief Minister, N-W.F.P. The Private Secretary to Provincial Minister for Law and Parliamentary Affairs, 3. 4
- N-W F.P.
- The Private Secretary to Chief Secretary, N-W.F.P. All the District Coordination Officers/Political Agents, N-W 5.
- The Secretary Public Service Commission, N-W.F.P. 6. .
- 7 The Registrar, Peshawar High Court, Peshawar,
- 8
- The Registrar, Service Tribunal, N-W.F.P., Peshawar. 9
- 10. The Advocate General, N-W.F.P., Peshawar.
- 11. The Accountant General, N-W.F.P., Peshawar, 12. The Director of Prosecutions, N-W.F.P., Home Department.
- 13. All the District Accounts Officers, N-W.F.P.
- 14. The Director Information, N-W.F.P., Peshawar.
- 15. The Controller Government Printing Press Peshawar. 16. All the Public Prosecutors, Additional Public Prosecutors and Additional
- Government Pleaders, N-W,F.P.
- 17. The Officers/Officials concerned.
- 18. Accountant "Mufassil Establishment" N-W.F.P., Law Department.
- 19. Computer Operator, Law Department.



REGISTERED NO. PIII GAZETTE

Annexure

ATTESTED

ADAMAHA

North-West Frontier Province

Published by Authority

PESHAWAR, WEDNESDAY, 12TH OCTOBER, 2005.

GOVERNMENT OF NORT-WEST FRONTIER PROVINCE, HOME AND TRIBAL AFFAIRS DEPARTMENT.

NOTIFICATION Dated 24th September, 2005.

No.SO(Prosecution) HD1-5/2005. In pursuance of the provision contained in Subrule (2) of Rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all previous Notification in this behalf the Home and Tribal Affairs Department, in consultation with the Establishment, Administration and Pinance Departments, hereby lay down the method of recruitment, qualifications and promotion. Notification shall be applicable to the posts borne on the strength of Directorate of Prosecution.

408

SECRETARY TO GOVERNMENT OF NWFP, HOME AND TRIBAL AFFAIRS DEPARTMENT. 409 NWEP GOVERNMENT GAZETTE, EXTRAORDINARY, 12TH OCTOBE

NWFP PROSECUTION SERVICE RULES

In exercise of powers conferred under Sub Rule 2 of Rule 3 of the NWFP Cive Servants (Appointment, Promotion and Transfer) Rules, 1989, the Home Department in consultation with Finance and Establishment Department is pleased to frame the Service Rules for the Prosecution Institution.

Short title, extent and commencement:-

These rules may be called as the North-West Frontier Province Prosecution Servic Rules, 2005.

2. These shall extend to the whole of the NWFP.

3. These shall come into force as and when notified in the official gazette.

Definitions:-

- (a) Director General Prosecution' means the Chief Prosecutor of the Province responsible for the management of Prosecution and control over Prosecutors appointed under sub section (3) of section 3 of this Act.
- (b) 'District Head of Prosecution' means the District Public Prosecutor or, where no District Public Prosecutor is appointed in a District, the Public Prosecutor of the District concerned:
- (c) 'Public Prosecutor' means a person appointed under Section 492 of Cr.P.C. and includes District Public Prosecutor, Deputy Public Prosecutor and Assistant Public Prosecutor as well as Special Public Prosecutor; and

5. The Prosecution Service shall be headed by a Director General Prosecution who shall be an Officer in BPS-19. He shall head the administration of Prosecution Service as an attached Department of Home & Tribal Affairs Department.

6. The Director General Prosecution shall be assisted by the following officers.

- (i) Director (Legal) in BPS-18.
- (ii) Director (Admn) in BPS-18.
- (iii) Assistant Director Administration-cum-Finance.in BPS-17.
- The Prosecution Service at the district level shall be headed by an officer in BPS-18 to be designated as District Public Prosecutor.
 - The District Public Prosecutor shall also be responsible for the administration of prosecution service in the district.
- 9. The District Public Prosecutor shall be assisted by such number of Public Prosecutors in BPS-18. Deputy Public Prosecutor in BPS-17 and Assistant Public Prosecutors in BPS 16 as the Government may, from time to time, determine keeping in view the number of courts in the province, provided that Assistant Public Prosecutor shall prosecute cases only in the courts of Magistrates.

10. Entry into Service:-.

(a)⁻

81

- Entry in to Prosecution Service shall be at the level of Assistant Public Prosecutor (BPS-16) through the NWFP Public Service Commission.
- (b) The probation period of appointees shall be two years. Probationers shall receive basic training for a period of six months, which shall include three months in the Provincial Services Academy/Federal Judicial Academy Islamabad and three months as attachment with various courts and District Public Prosecutors offices.

2				-	· · · · ·	1 " . V. CT			
3-1	S/				~~	TANT	25. 2005	X HA	۰.
- C.	W7 -		$r v r r n' + \Delta n n h h h D V$	17194	1111	юж	.K. 2003		,
	¥,	へいやりを1を4じん!!!! (こんクルミビトド)	FX FRAUKDUNAN L	1411	$\overline{\nabla \varphi}$				de la
1000	' .f	IVINKINIVIIIINI VIAAAAAAAAAAA				:			
- 27	· 42	DVERNMENT GAZETTE.	· · ·			· .	· · ·		ي.

Nomenclature	Scale	Minimum	Method of appointment	Age Limit	1
· · · · · · · · · · · · · · · · · · ·	· .	Qualification			
Director General	19	•	i) By promotion from amongst the Public Prosecutors.		· ·
Prosecution.			OR		
	•		ii) By transfer from amongst the		$\frac{1}{3}$
			Officers of PCS/DMGs.		
Diversion	18		i) By transfer from amongst the		
Director Administration			Public Prosecutors.		•
Administration			OR ALL AND		<u>ب</u> ر.
•		• .	ii) By transfer from amongst the		
•			Officers of PCS/ DMGs.		· 、
Director Legal	18		By transfer from amongst the	· • [.	••••
	1	a	Public Prosecutors.		
Public Prosecutor	18		By promotion from amongst the		
				Alter - Tant	ten rege
Deputy Public	17	Law Graduate 'at	i) 50% by promotion from		/
Prosecutor		least 2nd division from		. ĭ	
		recognized			
		University.	ii) 50% by 'initial recruit-ment through Public Service		
			Commission.		
the star			By transfer from amongst the		-
Assistant Director	17		Deputy Public Prosecutors.		.•
Admn-cum-			Debuild and a second seco		• • ;
Finance		Law Graduale .a	t Initial recruitment through	23-32	
Assistant Publi	c 16	Law Graduate .a		years	.
Prosecutor.		recognized University			J)

Eligibility Requirements:

- i) A person shall be eligible to be appointed as Ass ant Public Prosecutor who possesses a Law Degree from a recognized university.
 - The age limit for a person to be appointed as Assistant Public Prosecutor shall be from 23 to 32 years

States -

2. Reymotion.

i)

-ii)

iii)

ii)

- Subject to the availability of posts:
 - Promotion of BPS 19 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-18, subject to completion of at least 12 years service in BPS 17 & 18.
 - Promotion to BPS 18 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-17, subject to comp etion of a least 05 years service in BPS 17.
 - Promotion to BPS 17 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-16, subject to completion of at least 05 years service in BPS 16 and qualifying of the departmental promotion exam.
- 13. Method of appointment and promotion of ministerial staff.

and the second	· · · · · · · · · · · · · · · · · · ·			
	1.0 adlal	Minimum Qualification	Method of recruitment	Age
S. Nomenclature	actic		14-4-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	Limit
No. No.	of post	an water and the second second		23-32
		B.A. will Diploma in	By initial recruiment	22-22
Librarian.		Library Science.	hough PSC	years
一 在福利市场和新闻行路。	何時期以往	Library Science. And Inches	the output is the second second second	
THE REPORT OF THE PLANE	172516		By promotion on the	
	HARDEN -		basis of scniority-cum-	
Superintendent	利用金 にも		fitness from amongst	
731 5 -cum-				
			the Assistants with at	l .!*
Accountant	1. 1.		least 10 years service	
		1		
			as such.	

· .						- Jakat	
报	(J) ⁽)		· · ·		#	-1 PE	
	1			- COULD AOUDI	NARY 12TH OCTOBER	1001	
1.4	111	NWFP GOVERN	IMENT	GAZETTE, EXTRAORDI	<u>((/(((), /2//) / / / / / / / / / / / / / / / / /</u>	Y	
		and the second sec		Minimum Qualification	Method of recruitment	Age 1	
• •	S.	Nomenclature	Scale	Minimum Quanticution		l imit 16	
	No.		of post	L Bachelor's Degree (2 nd	By minal recraiment	21-30: 酸	39 A.
	3.	Statistical/Data	12	Class) with Physics,	unough rubite	Jeans of	
		Processing		Statistics or Econo-	Commision.	1	
	·	Supervisor		mics as one of the		1	人の間
	1			subjects from a reco-			
				gnized University; and			E.
1				ii. Three years experience in the field of data	and the second sec		Į.
				processing and super-			
	· •	· · · ·		visory experience and		•	
				data control and punch			
	•			verifier operation.		18-30	
	4.	Junior Scale	1. 12	i. Intermediate or equi-	By initial recruitment	ýears	
	4.	Stenographer.		valent qualification	through Public Service Commission.	yeare	
				from a recognized	Commission		
				board; and ii. A speed of 60 words		• • • • •	
				per minutes in shor		5	مبسب أد
•	•			hand in English and 35	5		
÷				words per minutes in	1 Sec. 1 Sec. 1	·	
				typewriting & knowle			
				dge of Computer in using of MS word &			
-				MAS livee			
:			-	Bachelor's degrees from	n a. 75% by promotion	18-30	
	5.	Assistant		a recognized University.	on the pasis of	y caise	
•					seniority-cumfitness		
	ļ				from amongst senior clerks with at least		
		1			five years service.		
					b. 25% by initial		•.
					recruitment through		
					PSC.		-
1	6.	Data-Key	1 10	i. Secondary Schoo	ol By initial recruitment	18-30	
÷	0.	Punch Operato	l i	certificate in 2	nd through Departmental	years	
				Division from			
· .	<u> </u>			recognized board; and ii. Speed. of 10000 kg			
	小学			depressions by hou	TS		
				for punching/da	ita		
۰,	- 1			entry/verification.			
	7	Senior Clerk	7	By promotion.	By promotion on the basis of seniority-cum		
•					fitness from amongst the	2	
			:		Junior Clerks with a	t Z	
•			1 I.		least five years service.		
۰.,	8	Junior Clerk	5	i. Matriculation	or a) 33% by promotion	1	
				equivalent	amongst on the basi a of seniority-cum		
				qualification from recognized board; an			
				ii. A speed of 30 wor			-
,				per minutes in typing	generation de la construction de	n i	
					the Governmen	(
•••• •	-				service with two)	

漸識調

 $(x,y) \in \{1, \dots, n\}$

÷

20

21

<u></u> 7

ĥ



Government Of Khyber Pakhtunkhwa Home & Tribal Affairs Department No.SO (Prosecution)/HD/1-10/2010 Dated Peshawar the 10/06/2011.

Ê

ATTRSTED

Annexure.

22

NOTIFICATION.

No.SO(Prosecution)/HD/1-10/2010. The following Assistant Public Prosecutors, DAM KHAN (BPS-16) are declared passed in the Departmental Examination mandatory under the Khyber Pakhtunkhwa Prosecution Service Rules, 2010, held in the month of May, 2011 :-

S.#	Name	Roll No.
1	Muhammad Shakeel Ahmad	040
2	Mr.Iltaf Hussain Akhtar	024
3	Muhammad Saleem	016
4	Mr. Abdul Salam	006
5	Mr. Javed Iqbal	032
6	Syed Falak Sair	050
7	Qazi Aftab Ahmad	013
8	Mr.Khalid Khan	046
9	Mr.Altaf Hussain	023
10	Mr. Imran Shah	015
11	Mohammad Shoaib	033
12	Muhammad Afzal Khan	. 037
13	Muhammad Nadeem	- 042
14	Mr.Tasawar Hussain	047
15	Sheikh Zahoor Ahmad	026
16	Mr. Rab Nawaz Khan	002
17	Mr. Atta Ullah Khan	.041
18	Mr.Atta Ullah	001
19	Mr. Javed Hussain	014
20	Mr. Fazli Hadi	030
21	Mr.Anis Ahmad Jan	022
22	Mohammad Changaiz Khan	π 027
23	Mohammad Zahoor	* 012 j
24	Abdul Hameed	017
25	Mr.Zulfiqar Khan	018
26	Mr.Pervez Elahi	020
27	Mr. Israr Ali	021 👘
28	Syed Murtaza Shah	025
29	Mr.Amanullah Khan	048
30	Mr. Abdul Rashid	. 031
31	Mr. Muzaffar Ahmad	049
32	Mr.Javed Rehman	051
33	Mr.Kirmatullah Khan	005
34	Mr.Pervaz Khan	011
35	Muhammad Qaisar Khan	004
36	Mr. Sher Zaman	003
37	Mr. Sher Bahadir	044

Ē





Government Of KHyber Pakhtunkhwa Home & Tribal Affairs Department No.SO (Prosecution)/HD/1-10/2010 Dated Peshawar the 10/06/2011.

38	Mr. Ziaullah Wazir	045
39	Muhammad Nasir	036
40	Mr. Ibrahim Khan	008
41	Mr. Abdul Sahkoor	010
42	Mr. Hayatullah	043

However, the following candidates could not get the qualifying standard and have been declared as failed:-

S.#	Name	Roll No.	
1	Mohammad Khalid	007	
2	Mr. Saeed Gul	009	
3	Mr. Zaheer-ud-Din Soofi	029	
4	Mr. Khurshid Anwar	034	
5	Mr. Shamsuz Zaman	035	
6	Muhammad Saeed	038	
7	Mr. Javed Iqbal Anwar	039	

Secretary to Govt of Khyber Pakhtunkhwa, Home & Tribal Affairs Department.

Endst: No.SO(Pros:)/HD/1-10/2010.

Dated Peshawar the 10/06/2011

Copy forwarded for information to: -1)-The Director General, Prosecution, Khyber Pakhtunkhwa, Peshawar. w/r to his letter No.DP/E&A/4676, dated 24/05/2011.

- 2)-All District Public Prosecutors in Khyber Pakhtunkhwa.
- 3)-Officers concerned
- 4)-P.S. to Secretary, Home & Tribal Affairs Department

USMAN ZAMAN), Section Officer (Prosecution) α //6 Ь 2-00 8



ATTESTED

The Chief Minister, Khyber Pakhtunkhwa Peshawar,

Through: <u>PROPER CHANNEL</u>

Subject: <u>REQUEST FOR PROMOTION TO THE POST OF PUBLIC</u> <u>PROSECUTOR BPS-18 WITH RELEVENT SERVICE</u> <u>BENEFIT AND SENIORITY.</u>

Respected Sir,

Τo

The applicant submit as under:

- That being Law Graduate, I was appointed as prosecuting sub-inspector BPS-14 in Police Department in the month of March, 1988.
- 2. That after qualifying the requisite courses of the police department and having passed the upper course examination with credit. I was promoted to the post of prosecuting inspector BPS-16 in the year 1996.
- 3. That I was due for promotion to the post of PDSP BPS-17, when the new Prosecution Department was established in the year 2002 and I was transferred from Police Department to Law Department and then to Home Department with designation of Deputy Public Prosecutor in the year 2003.

(Copy attached as annexure "A" and "B")

- 4. That I was awarded Four ACR'S (A-1) during the year 2003 to 2007 as Deputy Public Prosecutor and I was fit for promotion to the post of Public Prosecutor BPS-18 in the year 2007.
- 5. That under the new prosecution Act the post of Deputy Public Prosecutor was placed in BPS-17 but in violation of the above prosecution act I was deprived from the said benefit.
- That instead of promotion as Public Prosecutor, I was demoted and my name was placed with Assistant Public Prosecutor in the seniority list of 2007. (Copy attached as annexure "C").
- 7. That I along with my other colleagues approached your goodself for the up gradation of the post of Deputy Pubic Prosecutor to BPS-17 and your goodself was pleased to upgrade the said post. (Copy attached as annexure "D" and "E").
- 8. That despite the fact that BPS 17 has been allotted to the post of Deputy Public Prosecutor in the Prosecution Act 2005 and your goodself has also upgraded the said post to BPS 17 but 1 was kept in BPS 16 and have promoted to the same post i.e. Deputy Public Persecutor in the year 2012, which was given to me in the year 2003.
 - 9. That my demotion from deputy Public Prosecutor to Assistant Public Prosecutor was illegal against the nature, humanity and is against the Law and service structure.

10. That I was entitled to the promotion as public prosecutor in the year 2007.

P 126

- 11. That my entire record while servicing the Prosecution Department is clean and un blemished.
- 12. That I am at the verge of retirement from service on attaining the age of Superannuation on 31/03/2013.

13. That I am the senior most public prosecutor amongst the rest of the public prosecutors serving in the District as District Public Prosecutor.

It is humbly prayed that in the light of afore-mentioned circumstances I may kindly be promoted to the post of Public Prosecutor with back service benefits since 2007 and my name may kindly be placed at proper place in the seniority list and obliged.

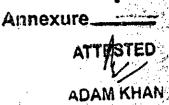
7 / 1 /2013 Dated: -

(PARVEZ KHAN)

Deputy Public Prosecutor Swabi

P/27

The Chief Secretary, Khyber Pakhtunkhwa Peshawar.



Subject: PROMOTION TO THE POST OF PUBLIC PROSECUTOR BPS-18.

Respected Sir,

Τo

The applicant submit as under:

- That I have completed my twenty five (25) years service as prosecutor in Police, Law & Prosecution branch of Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar with clean & unblemished record.
- 2. That I am at the verge of retirement from service on attaining the age of supranation on 31-03-2013
- 3. That the District Public Prosecutors namely Sahib Zada, Sakindar, Muhammad Faheem. Atta Ullah Khan and so many other officers were given promotion to the next higher scale as they were on the verge of retirement. By the time there was no post of BPS-19 however these officers were promoted to next higher scale just to avail the pecuniary benefit of the pension and gratuity. (Copy of Notification is attached as A, B & C).
- 4. That Mr. Lateef Khan Assistant Public Prosecutor, who was in BPS-16 & promoted to BPS-17 at the time of his retirement inspite of the facts that he had not fulfilled the mandatory requirement for promotion in next high scale i.e the passing of the Departmental Promotion Examination. (Copy of Notification is attached as D).
- That similarly Mr. Riaz UI Hassan Assistant Public Prosecutor who has recently been upgraded from BPS-14 to BPS-16 was also promoted to BPS-17 at the time of his retirement. (Copy of Notification is attached as E), and seniority list is attached as annex (F)
- That there are strong precedents in this context, where in the prosecutors have been promoted to the next higher scale at verge of their retirement.

Keeping in view the above mentioned facts, It is therefore requested that the applicant is also going to be retired on dated **31-03-2013**, so the case of applicant may kindly be treated as par with the above prosecutors.

It is further requested that the case may kindly be finalized prior to the 31-03-2013 that is the day of retirement.

(PARVEZ KHAN)

Deputy Public Prosecutor



Annexure.



Government Of Khyber Pakhtunkhwa Home & Tribal Affairs Department No. SO (Pros)/HD/1-10/2012 Dated Peshawar the 15/03/2013



То

The Director General (Prosecution) Khyber Pakhtunkhwa Peshawar.

Subject: - PROMOTION TO THE POST OF PUBLIC PROSECUTOR (BS-18).

Dear Sir,

Kindly refer to your letter DP/E&A 1 (100)2012/2244 dated 28/02/2013 and DP/E&A 1 (100)2012/1539 dated 08/02/2013 on the subject noted above and to state that the case has already been filed as recommended by the Directorate of Prosecution.

Yours faithfully,

(Khalid Akbar) 15

Section Officer (Prosecution) Ph: # 091-9210541 Fax: # 091-9210201

Endst:of even No.& Date.

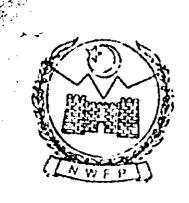
1.

Copy forwarded to the:

PS to Secretary, Home & Tribal Affairs Department Peshawar.

Section Officer (Prosecution)





COMPANY	Annexure
HOME & T.A.	ENT OF NW.F.P. S. DEPARTMENT
No	

Dated Peshawar, the -

NOTIFICATION.

No.SO(Prosecution)/HD/1-10/2008 Vol-1V. consultation with the Provincial Selection Board, is pleased to order the promotion of Mr Sikandar Azam Sahibzada, Public Prosecutor (EPS-18) to (BPS-19) on regular basis with effect from 11/11/2008.

> Secretary to Government of NWEP Home & Tribal Affairs Department

Endst:No.SO(Prosecution)/HD/1-10-08/Vol-IV.

Dated 19/11/2008;

Copy forwarded to: -

D-TE: Secretary to Chief Minister NWFP, Peshawar,

2)- The Accountant General, NWFP, Peshawar,

4)-District Public Prosecutor, Peshawar.

5)-P.S. to Chief Secretary L.W.F.P.

6)-P S. to Secretary Establishment Department. 7)-P.S. to Secretary Home & Tribal Allairs Department

(Milliammad Qia

Section Otherr (Prosecution)

5988

1-61 X D 7-24/11

P)	3	0
~1	/	J	

Annexure__

GOVERNMENT OF N.-W.F.P. HOME & T.As. DEPARTMENT No.

Dated Peshawar, the 200

OTIFICATION.

ムチアンコン

- No.SO(Prosecution)/HD/1-10/2008/Vol-V. The Competent Authority. in consultation with the Provincial Selection Board, is pleased to order the promotion of the following Officers from (BPS-18) to (BPS-19) on regular basis with effect from 12/02/2009:
 - i)-Mr.Attaullah Khan, District Public Prosecutor, Bannu,

ii)-Mr. Muhammad Faheem Jan, Director(Administration), Directorate of Prosecution NWFP, Peshawar,

> Secretary to Government of NWFJ Home & Tribal Affairs Department.

> > Section Officer

Endst No.SO(Pro_ecution)/11D/1-10/08_/Vol-V.

Dated 05 /03/2009.

secution)

Copy forwarded to: -

1)-The Secretary to Chief Minister NWFP, Peshawar.

2)-The Accountant General, NWFP, Peshawar.

3)-The Director General, Prosecution, NWFP, Peshawar,

A)-The District Public Prosecutor, Bannu.

5)-The District Accounts Officer, Bannu. 6)-P.S. to Chief Scoretary N.W.F.P.

7)-P.S. to Secretary Establishment Department.

8)-P.S. to Secretary Home & Tribal Affairs Department. 9)-Officers concerned.

Sem Aulu Drisú- P. P. Bu 14/3/09



01	
#/31	
GOVERNMENT OF N. HOME & T.As. DEPART	Annexure W.F.P. MENT. AT
No	
Dated Peshawar the	AD

200

NOTIFICATION.

No.S()(Prosecution)/11/D/1-10/2008/Vol-1V. consultation with Departmental Promotion Committee, is pleased to order the promotion of Mr.Latif Khan, Assistant Public Prosecutor (BPS-16) of Directorate of Prosecution NWFP to the post of Deputy Public Prosecutor (BPS-17) on regularhasis with effect from 13/11/2008.

> Secretary to Government of NWFP, Home & Tribal Affairs Department.

N SOPPOSE CHEMPHID' 10 you'V 1-1V. Ender

Dated 29/11/2008.

Copy for s del to: -

1)-The Accountant General, NWFP, Peshawar.

2)-The Director General, Prosecution, NWFP, Peshawar. 3)-The District Public Prosecutor, Peshawar,

4)-P.S. to Chief Secretary N.W.F.P.

5)-P.S. to Secretary Establishment Department.

5)-P.S. to Secretary Home & Tribal Affairs Department.

ammad Qasi Section Officer (Prosecution)

Annexure

(INWEP)	¢

GOVERNMENT OF NW. HOME & T.As. DEPARTM	P.P. ATTESTE
No	ADAM KHA
Dated Peshawar the	200 365

NOTIFICATION.

No.SO(Prosecution)/HD/1-10/2008/Vol-V. In partial modification of this Department's Notification No. SO (Prosecution)/HD/1-10/2008/Vol-V, dated 05/03/2009, promotion of the following Officers will be with immediate effect from 05/03/2009 instead of 12/02/2009: -

i)-Mr.Attaullah Khan, District Public Prosecutor, Bannu, presently Director General, Prosecution NWFP, Peshawar.

ii)-Mr. Muhammad Fahcem Jan, Director(Administration), Directorate of Prosecution NWFP, Peshawar.

> Secretary to Government of NWFP, Home & Tribal Affairs Department,

Endst:No.SO(Prosecution)/HD/1-10/08./Vol-V.

Dated 09/05/2009

Copy forwarded to: -

1)-The Secretary to Chief Minister NWFP, Peshawar.

2)-The Accountant General, NWFP, Peshawar.

3)-The Director General, Prosecution, NWFP, Peshawar.

- 4)-The District Public Prosecutor, Bannu.
- 5)-The District Accounts Officer, Bannu.

6)-P.S. to Chief Sccretary N.W.F.P.

7)-P.S. to Secretary Establishment Department.

8)-P.S. to Secretary Home & Tribal Affairs Department.

9)-Officers concerned.

Section Officer (Prosecution)

GOVERNMENT OF N.W.R.P. HOME & T.As. DEPARTMENT

Dated Prehawar, the -

Annexure.

200

ATTESTE

NOTIFICA TIQIN.

Ł

No. SO(Prosecution)/HD/1-8/2005. In terms of provisions of Rule-20 of the NWADAMKH/ Civil Servants Revised Leave Rules, 1981 and Instructions there under issued from time to time, sanction is hereby accorded to the encashment of Leave Preparatory to Retirement, equal to 180 days in favour of Mr. Latif Khan, Deputy Public Prosecutor (BPS-17), Peshawar subject to availability of leave at his credit and clearance of financial liability.

....

2. In terms of Section-13 of the NWFP Civil Servants Act. 1973 he stands a retired from service on 14/11/2008 (Afternoon), with retrospective effect, on attaining the age of superannuation.

> SECRETARY TO GOVERNMENT OF NWFP, HOME & TRIBAL AFFAIRS DEPARTMENT

Endst:No.SO(Pros:)/11D/1-8/2005.

Dated 23/12/2008.

Copy forwarded to: -

1)-The Accountant General, NWFP, Peshawar.

2)-The Director General, Prosecution, NWFP, Peshawar, w/r to his letter No.DP/E&A/1(51)/06/6406.dated 13/12/2008.

3)-The District Public Prosecutors, Peshawar. 4)-Officer concerned.

(Muhummad Qasiny)

Section Officer (Prosecution)

In the case and page 3 v

· \$ /34



ATTEST

GOVERNMENT OF N.W.F.P. HOME & T.As. DEPARTMENT

No.

Dated Peshawar, the =

NOTIFICA JON.

No.SO(Proscention)/[110/1+10/2008/Vol-1V] the Competent zonsultation with Departmental Promotion Committee, is pleased to order promotion of Mr.Riaz-ul-Hassan, Assistant Public Prosecutor (HPS-16) Directorate of Prosecution NWFP to the post of Deputy Public Prosecutor (BPS on regular basis with effect from 29/01/2009.

> Secretary to Government of NW Home & Tribal Affairs Description

> > Dated

11/02/2009

Hudst: No.SO(Prosecution).110/1-10/08./Vol. iV.

Copy forwarded to: -

1)-The Director General, Prosecution, NWFP, Peshawar,

2)-The District Public Prosecutor, Charsadda,

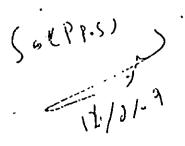
3)-The District Accounts Officer, Charsadda,

4)-P.S. to Chief Secretary N.W.F.P.

5)-P.S. to Secretary Establishment Department

6)-P.S. to Secretary Home & Tribal Affairs Department. 7)-Officer* concerned. *

Section Clife



-107.1 ·

	Verlez	Lopy of	TANLE - 1	
		10	PP-	.34
GOVER	NMENT OF	N.W.F.P	•	100
HOME	& T.As.	DEPARTME	NT A	TIFATE
,			· · · · · · · · · · · · · · · · · · ·	Prina
No •	· · ·	· .	AD	AM KHA
Dated	Peshawa	r the		200

NOTIFICATION

No: SO(Prosecution)(HD)1-10(2008/Vol-IV. The competent Authority in consultation with Department/Promotion Committee is pleased to order the Promotion of Mr. Riazul Hassan. Assistant Public Prosecutor(BPS-16) of Directorate of Prosecution NWFP to the post of Deputy Public Prosecutor (BPS-17) on regular basis with effect from 29.01.2009.

> Secretary to Government of NWFP Home and Tribal Affairs Deptt:

Endst. No. SO(Prosecution)(HD)/1-10/08/Vol.IV dt: 11.02.2009

Copy forwarded to :

1. The Director General Prosecution NWFP Peshawar.

2. The District Public Prosecutor Charsadda

3. The District Accounts Officer Charsadda.

4. The P.S. to Chief Secretary NWFP

5. P.S. to Secretary Establishment Department

6. P.S. to Secretary Home and Tribal Affairs Department 7. Officer concerned.

Sd/-

Section Officer (Prosecution)

1/35

Annexure

ATTESTED

ADAM KHA

DIRECTORATE OF PROSECUTION NWFP

NOTIFICATION : No. DPE&A-1(49)05 dated 10th March 2007. /976 -1001

The joint seniority of the Public Prosecutors as it stood on 31/12/2006 received from the Police and Law departments is hereby notified as per the attached list.

rector General Prosecution AWFP

Endst: N0 dated & even.

Copies forwarded to:

1. The Section officer (Prosecution) Home & Tribal Affairs Department.

2. All the District Public Prosecutors in NWFP for circulating the same amongst the subordinate Prosecutors.

Director General Prosecution WWFP

FINAL SENIORITY LIST OF PUBLIC PROSECUTORS (BPS-18) DEPUTY PUBLIC PROSECUTORS (BPS-17) AND ASSISTANT PUBLIC PROSECUTORS (BPS-16) AND (BPS-14) AS ON 07/03/2007.

P/36

المتعفية الالما متصاويتهم والأرار المسارب

•	المولية المستحد من من المراجع المستحد الم المستحدة المراجع المعالية المتحد والمستحد المحمد والمراجع والمستحد و المستحدة المحمد عن الحرير المراجع المحمد المحمد المحمد المحمد المحمد والمستحد المحمد المحمد والمحمد والمحمد وال					
				میشد. ماین میکند و با با در مدکنه میکند . ماین این میکند . میکند . میکنه میکند و میکند .	Date of first	
S.NO.	Name of officer.	Educational qualification.	Date of Birth.	District of domicile.	service on regular basis with basic pay	First regular appointment to the service/cadre.
	Mr. Sher Muhammad Khan	B.A.L.L.B	15/02/1949	Swat	scale. 21/01/1980	BPS-18
V.		B.Sc.L.L.B	08/08/1948	Kohat	14/11/1979	BPS-18
12	Mr. Younis Khan Shinwari	B.Sc.L.L.B	01/11/1949	Bannu	17/11/1979	BPS-18
3.	Mr. Attaullah Khan Mr. Sikandar Azam Sahibzada	B.A.L.L.B	19/11/1948	Peshawar	20/05/1980	BPS-18 BPS-18
4	Mr. Muhammad Fahim Jar	B.A.L.L.B	10/09/1949	Peshawar	05/07/1980	BPS-18
<u> </u>	Mr. Mullanninger en	B.Sc.L.L.B	12/06/1948	Mardan Mansehra	10/01/1981	BPS-18
<u> </u>	Mr. Shah Alam Khan	E.A.L.L.B	.01/08/1947 : 11/06/1948 i.	Peshawar	11/12/1982	BPS-18
8	Miss Suriyya Jabeen	B.A.L.L.B	08/10/1948	Kohat	19/12/1982	BPS-18
9	Mr. Saif ur Rehman	B.A.L.L.B B.A.L.L.B	01/11/1951	Tank	03/01/1977	BPS-18
10	Mr. Sana Ullan Khan	B.A.L.L.B	19/05/1952	Charsadda	31/10/1985	BPS-18 BPS-18
11	Mr. Syed Facoz Shah	B.A.L.L.B	27/02/1952 🐇	Chitral	03/03/1978	BPS-18
12	1 Alump	B.A.L.L.B	05/01/1953	Peshawar	13/04/1989	BPS-18
13		B.Sc.L.L.B	20/04/1956	Charsadda	12/07/1980	BPS-18
14	- Zamon Kran	M.A.L.L.B	25/10/1954	Swabi	04/10/1995	BPS-18
16	Mr. Muhammad Idris	B.A.L.L.B	02/04/1960	Kohat	04/10/1995	BPS-18
17	7: Mr. Muhammad Zubair Ar. var	B.A.L.L.M B.Sc.L.L.B	15/12/1963	Peshawar	04/10/1995	BPS-18
18	3: Mr. Bital Mohyudin;	D.00.L.L.D				

(i)

19. Mr. Fakhrul Islam B.A.L.L.B. 15/06/1960 Abbottabad 10/10/1995 BPS-18 20. Mr. Muhammad Sultan Mehmood B.A.L.L.B. 06/01/1960 D.I. Khan 04/10/1995 BPS-18 21. Mr. Amjid Ali Shah B.A.L.L.B. 10/09/1960 Charsedda 04/10/1995 BPS-18 22. Mr. Sikandar Hayat B.Sc.L.L.B. 10/09/1960 Charsedda 04/10/1995 BPS-18 23. Mr. Muhammad Ibrahim B.A.L.L.B. 15/02/1963 Malakand 04/10/1995 BPS-18 24. Mr. Amir Subhan Khattak B.A.L.L.B. 15/01/1956 Dir (Lower) 04/10/1995 BPS-18 25. Mr. Muhammad Nawaz B.A.L.B. 22/03/1960 Shangla 28/11/1998 BPS-18 26. Mujarab Khan B.A.L.L.B 02/03/1959 Malakand 28/11/1998 BPS-17 28. Mr. Taj Noor B.A.L.L.B 04/04/1948 Peshawar 5/:1/11998 BPS-17 29. Mr. Muhammad Jalal ud Din B.A.L.L.B 01/04/1965 Manseh				· · · · · · · · · · · · · · · · · · ·		BPS-18
19. Mr. Fakhrul Islam BALLUB 06/01/1866 DI. Khan 11/10/1995 BPS-18 20. Mr. Muhammad Sultan Mehmood BALLUB 16/06/1963 Mardan 04/10/1995 EPS-18 21. Mr. Amjid Ali Shah B.ScLL.B 16/06/1963 Markand 04/10/1995 EPS-18 22. Mr. Sikandar Hayat B.ALL.B 15/02/1963 Malakand 04/10/1995 BPS-18 23. Mr. Amir Subhan Khattak B.ALL.B 20/12/15/90 Nowshera 04/10/1995 BPS-18 24. Mr. Amir Subhan Khattak B.ALL.B 20/12/15/90 Nowshera 04/10/1995 BPS-18 25. Mr. Muhammad Nawaz B.ALL.B 22/03/1960 Shangla 2/11/1998 BPS-18 26. Mujarrab Khan B.ALL.B 22/03/1965 Kohat 2/11/1992 BPS-17 28. Mr. Tai Noor B.ALL.B 05/03/1959 Malkand 2/11/1992 BPS-17 29. Mr. Nasnullah Khan B.ALL.B 00/04/1953 Peshawar 05/11/1998 BPS-17 30. Mr. Nasnullah Khan B.ALL.B 01/01/1964<			15/06/1960	Abbottabad	04/10/1995	
Display Display BALLB 16/06/1963 Mardan Display 20. Mr. Amjid Ali Shah BALLB 16/06/1963 Mardan 04/10/1935 BPS-18 21. Mr. Amjid Ali Shah B.Sc.LLB 10/09/1963 Malakand 04/10/1995 BPS-18 22. Mr. Sikandar Hayat B.A.LLB 16/02/1963 Malakand 04/10/1995 BPS-18 23. Mr. Muhammad Ibrahim B.A.LLB 20/12/1969 Nowshera 04/10/1995 BPS-18 24. Mr. Amir Subhan Khattak B.A.LLB 20/12/1969 Nangia 25/11/1998 BPS-18 25. Mr. Muhammad Nawaz B.A.LLB 22/05/1965 Kohat 24/11/1998 BPS-18 26. Mujarrab Khan B.A.LLB 24/05/1959 Malakand 28/11/1998 BPS-17 28. Mr. Taij Noor B.A.LLB 04/10/1984 Peshawar 05/11/1998 BPS-17 30. Mr. Nasrullah Khan B.A.LLB 04/10/1986 Peshawar 05/11/1998 BPS-17 3	in LMr. Enkbrul Islam	B.A.L.L.B		D.I. Khan		
21. Mr. Amjid Ali Shan B. Sc.L.I.B 10/09/1960 Chaissauda 04/10/1995 BPS-18 22. Mr. Sikandar Hayat B.A.L.L.B 15/02/1960 Malakand 04/10/1995 BPS-18 23. Mr. Amir Subhan Khattak B.A.L.L.B 20/12/1950 Nowshera 04/10/1995 BPS-18 24. Mr. Amir Subhan Khattak B.A.L.L.B 15/01/1956 Dir (Lower) 04/10/1995 BPS-18 25. Mr. Muhammad Nawaz B.A.L.L.B 22/03/1960 Shangia 25/11/1998 BPS-18 26. Mujarrab Khan B.A.L.L.B 24/06/1965 Kohat 4/11/1998 BPS-17 28. Mr. Tarig Bakhsh B.A.L.L.B 24/08/1948 Peshawar 52/11/1998 BPS-17 29. Mr. Muhammad Jalal ud Din B.A.L.B 10/04/1963 Peshawar 52/11/1998 BPS-17 30. Mr. Shakzada M.A.L.B 04/10/1964 Bajure 05/11/1998 BPS-17 33. Mr. Muhammad Arif B.A.L.B 10/10/1965 Peshawar 05/11/1998 BPS-17 34. Mr. Shakzada B.A.L.B <	19. Mr. Fakind Islamd Sultan Mehmood	B.A.L.L.B		Mardan	04/10/1995	
21. Mir. Sikandar Hayat B.S.C.L.B 15/02/1963 Malakand 04/10/1993 BIPS-18 23. Mr. Muhammad Ibrahim B.A.L.L.B 15/02/1959 Nowshera 04/10/1995 BPS-18 24. Mr. Amir Subhan Khattak B.A.L.L.B 15/01/1956 Dir (Lower) 04/10/1995 BPS-18 25. Mr. Muhammad Nawaz B.A.L.L.B 15/01/1966 Kohat 4/10/1995 BPS-18 26. Mujarrab Khan B.A.L.L.B 22/03/1960 Shangla 4/11/1988 BPS-18 27. Mr. Tarig Bakhsh B.A.L.L.B 22/03/1965 Kohat 4/11/1998 BPS-18 27. Mr. Tarig Bakhsh B.A.L.L.B 24/05/1965 Kohat 28/11/1988 BPS-18 28. Mr. Taj Noor B.A.L.L.B 24/03/1948 Peshawar 12/12/1992 BPS-17 28. Mr. Nasrullah Khan B.A.L.L.B 01/04/1953 Peshawar 05/11/1998 BPS-17 31. Mr. Shahzada M.A.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 32. Mr. Hafiz Muhammad Hroon B.A.L.B 01/04/1965 Peshawar 05/11/1998 BPS-17 33. Mr. Nusratullah Jan B.A.L.B	20. Mr. Amiid Ali Shah	B.A.L.L.B		Charsadda	04/10/1995	
22. IM. Sulandui B.A.LL.B 20/12/1959 Nowshera 04/10/1995 Discrete 23. Mr. Muhammad Ibrahim B.A.LL.B 15/01/1956 Dir (Lower) 04/10/1995 BPS-18 24. Mr. Amir Subhan Khattak B.A.LL.B 12/07/1960 Shangla 25/11/1998 BPS-18 25. Mr. Muhammad Nawaz B.A.LL.B 22/03/1960 Shangla 25/11/1998 BPS-18 26. Mujarrab Khan B.A.LL.B 22/03/1960 Shangla 25/11/1998 BPS-17 28. Mr. Tarig Bakhsh B.A.LL.B 24/08/1948 Peshawar 52/11/1998 BPS-17 28. Mr. Tarig Bakhsh B.A.LL.B 24/08/1948 Peshawar 05/11/1998 BPS-17 29. Mr. Muhammad Jalal ud Din B.A.LL.B 01/04/1953 Peshawar 05/11/1998 BPS-17 31. Mr. Shahzada MA.LL.B 01/04/1965 Mansehra 05/11/1998 BPS-17 32. Mr. Hafiz Muhammad Hroon B.A.LL.B 01/01/1965 Peshawar 05/11/1998 <td>21. Mr. Airina An Ostandar Havat</td> <td>B.Sc.L.L.B</td> <td></td> <td></td> <td></td> <td>00-18</td>	21. Mr. Airina An Ostandar Havat	B.Sc.L.L.B				00-18
24. Mr. Amir Subhan Khattak B.A.L.L.B 15/01/1956 Dir (Lower) 25/11/1998 BPS-18 25. Mr. Muhammad Nawaz B.A.L.L.B 22/03/1960 Shangla 25/11/1998 BPS-18 26. Mujarrab Khan B.A.L.L.B 22/03/1965 Kohat 4/11/1998 BPS-18 27. Mr. Tarig Bakhsh B.A.L.L.B 05/03/1959 Malakand 28/11/1992 BPS-18 28. Mr. Tarig Bakhsh B.A.L.L.B 05/03/1959 Malakand 12/12/1992 BPS-17 28. Mr. Tarig Bakhsh B.A.L.L.B 04/04/1953 Peshawar 5/11/1998 BPS-17 29. Mr. Nasrullah Khan B.A.L.L.B 04/10/1964 Bajure 05/11/1998 BPS-17 31. Mr. Shahzada M.A.L.L.B 04/10/1965 Peshawar 05/11/1998 BPS-17 32. Mr. Hafiz Muhammad Hreon B.A.L.L.B 01/04/1964 Malakand 05/11/1998 BPS-17 33. Mr. Sustaulah Jan B.A.L.B 01/01/1964 Malakand 05/11/1988	22. Mr. Sikandar 1.12	B.A.L.L.B				
25. Mr. Muhammad Nawaz B.A.L.L.B 22/03/1960 Shangia 22/11/1998 BPS-18 26. Mujarrab Khan B.A.L.L.B 24/05/1965 Kohat 4/11/1998 BPS-18 27. Mr. Tarja Bakhsh B.A.L.L.B 05/03/1959 Malakand 28/11/1992 BPS-17 28. Mr. Tarja Noor B.A.L.L.B 04/08/1953 Peshawar 52/11/1992 BPS-17 29. Mr. Muhammad Jalal ud Din B.A.L.L.B 10/04/1953 Peshawar 52/11/1998 BPS-17 30. Mr. Nasrullah Khan B.A.L.L.B 04/10/1964 Bajure 05/11/1998 BPS-17 31. Mr. Shahzada B.A.L.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 32. Mr. Hafiz Muhammad Hroon B.A.L.L.B 01/04/1965 Masehra 05/11/1998 BPS-17 33. Mr. Nusratullah Jan B.A.L.B 10/10/1965 Peshawar 05/11/1998 BPS-17 34. Mr. Muhammad Arif B.A.L.B 10/10/1964 Malakand 05/11/1998 BPS-17 35. Mr. Saleem Muhammad B.A.L.B 10/	23. Mr. Mullanmad					
25. Mil. multility B.A.L.L.B 24/05/1965 Kohat 4/11/1998 BPS-18 26. Mujarrab Khan B.A.L.L.B 05/03/1959 Malakand 28/11/1998 BPS-18 27. Mr. Tariq Bakhsh B.A.L.L.B 05/03/1959 Malakand 28/11/1992 BPS-17 28. Mr. Taj Noor B.A.L.L.B 04/04/1953 Peshawar 57/11/1998 BPS-17 30. Mr. Nasrullah Khan B.A.L.L.B 04/10/1964 Bajure 05/11/1998 BPS-17 31. Mr. Shahzada M.A.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 32. Mr. Hafiz Muhammad Hroon B.A.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 33. Mr. Nusratullah Jan B.A.L.B 01/04/1965 Peshawar 05/11/1998 BPS-17 34. Mr. Muhammad Arif B.A.L.B 01/04/1964 Malakand 05/11/1998 BPS-17 35. Mr. Saleem Muhammad B.A.L.B 04/04/1964 Malakand 05/11/1998 BPS-17 36. Mr. Abdul Wajid B.A.L.L.B 01/07/1968	24. Mr. Althi Sublid Vawaz	B.A.L.L.B				
26. Midjarab (Near) B.A.L.L.B 24/00/3959 Malakand 28/11/1998 BF9-17 27. Mr. Tariq Bakhsh B.A.L.L.B 24/08/1948 Peshawar 12/12/1992 BPS-17 28. Mr. Taj Noor B.A.L.L.B 24/08/1948 Peshawar 12/12/1992 BPS-17 29. Mr. Muhammad Jalal ud Din B.A.L.L.B 10/04/1953 Peshawar 05/11/1998 BPS-17 30. Mr. Nasrullah Khan B.A.L.L.B 04/10/1964 Bajure 05/11/1998 BPS-17 31. Mr. Shahzada M.A.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 32. Mr. Hafiz Muhammad Hroon B.A.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 33. Mr. Nusratullah Jan B.A.L.B 10/10/1966 Charsadda 05/11/1998 BPS-17 34. Mr. Muhammad Arif B.A.L.B 01/04/1964 Malakand 05/11/1998 BPS-17 35. Mr.Saleem Muhammad B.A.L.B 10/10/1966 D.I.Khan 05/11/1998	25. Mr. Muhammad Hutte	B.A.L.L.B				
27. Mir. Tai Noor B.A.L.I.B 00/00/1948 Peshawar 12/12/1992 BFS-17 28. Mir. Taj Noor B.A.L.I.B 10/04/1953 Peshawar 5: /11/1998 BFS-17 30. Mr. Masrullah Khan B.A.L.I.B 10/04/1964 Bajure 05/11/1998 BFS-17 31. Mr. Shahzada M.A.L.L.B 04/10/1964 Bajure 05/11/1998 BFS-17 32. Mr. Hafiz Muhammad Hroon B.A.L.L.B 01/04/1965 Mansehra 05/11/1998 BFS-17 33. Mr. Nusratullah Jan B.A.L.L.B 10/10/1965 Peshawar 05/11/1998 BFS-17 34. Mr. Muhammad Arif B.A.L.L.B 10/10/1965 Charsadda 05/11/1998 BFS-17 35. Mr. Saleem Muhammad B.A.L.L.B 10/10/1966 D.I.Khan 05/11/1998 BFS-17 36. Mr. Abdul Wajid B.A.L.L.B 10/10/1963 D.I.Khan 11/01/2001 BFS-17 37. Mr. Imtiaz-ud- Din Mansoor B.A.L.L.B 03/03/1968 Swabi 19/04/2002 BFS-17 39. Mr. Gul Waris Khan B.A.L.L.B	26. Mujarrab Kilan	B.A.L.L.B				
28. Mr. Muhammad Jalal ud Din B.A.L.L.B 24.00/(1953) Peshawar 5: /11/1998 BPS-17 2.30. Mr. Nasrullah Khan B.A.L.L.B 10/04/1953 Peshawar 05/11/1998 BPS-17 31. Mr. Shahzada M.A.L.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 32. Mr. Hafiz Muhammad Hroon B.A.L.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 33. Mr. Nusratullah Jan B.A.L.L.B 10/10/1965 Peshawar 05/11/1998 BPS-17 34. Mr. Muhammad Arif B.A.L.L.B 10/10/1966 Charsadda 05/11/1998 BPS-17 35. Mr. Saleem Muhammad B.A.L.L.B 01/04/1964 Malakand 05/11/1998 BPS-17 36. Mr. Abdul Wajid B.A.L.L.B 01/01/1963 D.I.Khan 11/01/2001 SPS-17 37. Mr. Imitiazud- Din Mansoor B.A.L.L.B 10/07/1968 F.R. Bannu 09/01/2001 BPS-17 38. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 30/04/2002 BPS-17 39. Mr. Zulfigar Ali Khan	27. Mr. Tariq Bakisi	B.A.L.L.B			12/12/1992	BPS-17
	28. Mr. Laj Nool				5: /11/1993	
+ 30. Mr. Nasrullan Knan M.A.L.L.B 04/10/1984 Bajle 05/11/1998 BPS-17 31. Mr. Shahzada B.A.L.L.B 01/04/1965 Mansehra 05/11/1998 BPS-17 32. Mr. Hafiz Muhammad Hroon B.A.L.L.B 10/10/1965 Peshawar 05/11/1998 BPS-17 33. Mr. Nusratullah Jan B.A.L.L.B 10/10/1966 Charsadda 05/11/1998 BPS-17 34. Mr. Muhammad Arif B.A.L.L.B 31/03/1966 Charsadda 05/11/1998 BPS-17 35. Mr. Saleem Muhammad B.A.L.L.B 04/04/1964 Malakand 05/11/1998 BPS-17 36. Mr. Abdul Wajid B.A.L.L.B 10/10/1966 D.I.Khan 05/11/1998 BPS-17 37. Mr. Imtiaz-ud- Din Mansoor B.A.L.L.B 10/07/1968 F.R. Bannu 09/01/2001 BPS-17 38. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 19/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.B 01/01/1957 Swabi 30/04/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.L.B	-)- 29. Mr. Muhammau Jalar uu 200	B.A.L.L.B			05/11/1998	BPS-17
31. Mr. Shahzada 05/11/198 BPS-17 32. Mr. Hafiz Muhammad Hroon B.A.L.L.B 10/10/1965 Peshawar 05/11/1988 BPS-17 33. Mr. Nusratullah Jan B.A.L.L.B 31/03/1966 Charsadda 05/11/1988 BPS-17 34. Mr. Muhammad Arif B.A.L.L.B 04/04/1964 Malakand 05/11/1988 BPS-17 35. Mr. Saleem Muhammad B.A.L.L.B 04/04/1964 Malakand 05/11/1988 BPS-17 36. Mr. Abdul Wajid B.A.L.L.B 10/10/1966 D.I.Khan 11/01/2001 3PS-17 37. Mr. Imtiaz-ud- Din Mansoor B.A.L.L.B 10/07/1968 F.R. Bannu 09/01/2001 BPS-17 39. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 19/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.B 01/01/1957 Swabi 30/04/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.B 01/04/1968 F.R.Bannu 09/05/2002 SPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Lower) 19/04/2002	- 30. Mr. Nasrullan Khan	M.A.L.L.B			05/11/1998	1 BPS-17
32. Mr. Hafiz Muhammad Hiesen B.A.L.L.B 10/10/1965 Pesnatura 05/11/1998 BPS-17 33. Mr. Nusratullah Jan B.A.L.L.B 31/03/1966 Charsadda 05/11/1998 BPS-17 34. Mr. Muhammad Arif B.A.L.L.B 04/04/1964 Malakand 05/11/1998 BPS-17 35. Mr.Saleem Muhammad B.A.L.L.B 04/04/1964 Malakand 05/11/1998 BPS-17 36. Mr.Saleem Muhammad B.A.L.L.B 10/10/1966 D.I.Khan 05/11/1998 BPS-17 37. Mr. Imtiaz-ud- Din Mansoor B.A.L.L.B 10/07/1968 F.R. Bannu 09/01/2001 BPS-17 38. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 19/04/2002 BPS-17 39. Mr. Zulfigar Ali Khan B.A.L.L.B 01/01/1957 Swabi 30/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.B 01/03/1966 Dir (Lower) 19/04/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.B 01/04/1969 Dir (Upper)	31. Mr. Shahzada	B.A.L.L.B	01/04/1965		05/11/1998	<u>1 BPS-17</u>
33. Mr. Nusratulian Jahr B.A.L.L.B 31/03/1986 Orlandeeu 05/11/1998 BPS-17 34. Mr. Muhammad Arif B.A.L.L.B 04/04/1964 Malakand 05/11/1998 BPS-17 35. Mr.Saleem Muhammad B.A.L.L.B 10/10/1966 D.I.Khan 01/10/12001 3PS-17 36. Mr. Abdul Wajid B.A.L.L.B 10/10/1963 D.I.Khan 11/01/2001 3PS-17 37. Mr. Imtiaz-ud- Din Mansoor B.A.L.L.B 10/07/1968 F.R. Bannu 09/01/2001 BPS-17 38. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 19/04/2002 BPS-17 39. Mr. Zulfiqar Ali Khan B.A.L.L.B 01/01/1957 Swabi 30/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.B 01/03/1966 Dir (Lower) 09/05/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 43. Mr. Arif Ullah Shah <	32. Mr. Hafiz Muhammau moon	B.A.L.L.B			05/11/1998	BPS-17
34. Mr. Muhammad Alli B.A.L.L.B 04/04/1964 Matakanu 05/11/1998 BPS-17 35. Mr. Saleem Muhammad B.A.L.L.B 10/10/1966 D.I.Khan 11/01/2001 BPS-17 36. Mr. Abdul Wajid B.A.L.L.B 12/10/1963 D.I.Khan 11/01/2001 BPS-17 37. Mr. Imtiaz-ud- Din Mansoor B.A.L.L.B 10/07/1968 F.R. Bannu 09/01/2001 BPS-17 38. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 19/04/2002 BPS-17 39. Mr. Zulfigar Ali Khan B.A.L.L.B 01/01/1957 Swabi 30/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.B 01/01/1957 Swabi 30/04/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.L.B 01/02/1968 F.R.Bannu 09/05/2002 DPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 43. Mr. Arif Ullah Shah 3> B.A.L.L.B 15/01/1965 Kohat 30/04/2002 BPS-17 44. Mr. Farmanullah	33. Mr. Nusratullan Jan	B.A.L.L.B			05/11/1998	
/ 35. Mr. Saleem Mutaninae B.A.L.L.B 10/10/1966 D.I.Khan 11/01/2001 SPS-17 36. Mr. Abdul Wajid B.A.L.L.B 12/10/1963 D.I.Khan 09/01/2001 BPS-17 37. Mr. Imtiaz-ud- Din Mansoor B.A.L.L.B 10/07/1968 F.R. Bannu 09/01/2002 BPS-17 38. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 19/04/2002 BPS-17 39. Mr. Zulfiqar Ali Khan B.A.L.L.B 01/01/1957 Swabi 30/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.B 01/03/1966 Dir (Lower) 19/04/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.L.B 01/04/1969 Dir (Lower) 09/05/2002 BPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Upper) 30/04/2002 BPS-17 43. Mr. Arif Ullah Shah 3> B.A.L.L.B 15/01/1965 Kohat 30/04/2002 BPS-17 44. Mr. Farmanullah M.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17 45. Mr. Muhammad Jehan	34. Mr. Muhammad Am	B.A.L.L.B			05/11/1998	<u>BPS-17</u>
36. Mr. Abdul Wajid B.A.L.L.B 12/10/1963 D.H.(Han) 09/01/2001 BPS-17 37. Mr. Imtiaz-ud- Din Mansoor B.A.L.L.B 10/07/1968 F.R. Bannu 19/04/2002 BPS-17 37. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 19/04/2002 BPS-17 39. Mr. Zulfiqar Ali Khan B.A.L.L.B 03/03/1968 Swabi 30/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.B 01/01/1957 Swabi 30/04/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.L.B 10/03/1966 Dir (Lower) 19/04/2002 BPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 04/02/1968 F.R.Bannu 09/05/2002 BPS-17 43. Mr. Arif Ullah Shah 3> B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 44. Mr. Farmanullah M.A.L.L.B 15/01/1965 Kohat 19/04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17 45. Mr. Auhammad Jehanzeb </td <td>235. Mr.Saleem Munaminac</td> <td>B.A.L.L.B</td> <td></td> <td></td> <td>11/01/2001</td> <td></td>	235. Mr.Saleem Munaminac	B.A.L.L.B			11/01/2001	
37. Mr. Imtiaz-ud- Diff Marisoon B.A.L.L.B 10/07/1968 F.R. Dame 19/04/2002 BPS-17 38. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swabi 30/04/2002 BPS-17 39. Mr. Zulfiqar Ali Khan B.A.L.L.M 01/01/1957 Swabi 30/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.M 01/03/1966 Dir (Lower) 19/04/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.L.B 04/02/1968 F.R.Bannu 09/05/2002 BPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 43. Mr. Arif Ullah Shah 3> B.A.L.L.B 01/04/1969 Dir (Upper) 30/04/2002 BPS-17 44. Mr. Farmanullah M.A.L.L.B 15/01/1965 Kohat 30/04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 25/12/1967 Peshawar 19/04/2003 BPS-17	36. Mr. Abdul Wajid	B.A.L.L.B			09/01/2001	
+ 38. Mr. Gul Waris Khan B.A.L.L.B 03/03/1968 Swaun 30/04/2002 BPS-17 39. Mr. Zulfiqar Ali Khan B.A.L.L.M 01/01/1957 Swabi 30/04/2002 BPS-17 40. Mr. Sibghatullah B.A.L.L.M 01/03/1966 Dir (Lower) 19/04/2002 BPS-17 41. Mr. Saeed Naeem M.A.L.L.B 10/03/1968 F.R.Bannu 09/05/2002 BPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 43. Mr. Arif Ullah Shah 3 B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 44. Mr. Farmanullah M.A.L.L.B 15/01/1965 Kohat 30/04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17 45. Mr. Jahanzeb B.A.L.L.B 25/12/1967 Peshawar 04/02/003 BPS-17 46. Mr. Jahanzeb B.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17	37. Mr. Imtiaz-ud- Din Marisoon	B.A.L.L.B			19/04/2002	
39. Mr. Zulfiqar Ali Khan B.AL.L.M 01/01/1957 Swabt 19/04/2002 BPS-17 40. Mr. Sibghatullah M.A.L.L.B 10/03/1966 Dir (Lower) 09/05/2002 DPS-17 41. Mr. Saeed Naeem M.A.L.L.B 04/02/1968 F.R.Bannu 09/05/2002 BPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 43. Mr. Arif Ullah Shah 3> B.A.L.L.B 01/04/1965 Kohat 30/04/2002 BPS-17 44. Mr. Farmanullah M.A.L.L.B 15/01/1965 Kohat 19/04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17 45. Mr. Jehanzeb B.A.L.L.B 25/12/1967 Peshawar 04/04/2003 BPS-17	38. Mr. Gul Waris Khan	B.A.L.L.B			30/04/2002	
40. Mr. Sibghatullah M.A.L.L.B 10/03/1966 Dir (Lower) 09/05/2002 DPS-17 41. Mr. Saeed Naeem B.A.L.L.B 04/02/1968 F.R.Bannu 09/05/2002 BPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 43. Mr. Arif Ullah Shah 3> B.A.L.L.B 01/04/1965 Kohat 30/04/2002 BPS-17 44. Mr. Farmanullah M.A.L.L.B 15/01/1965 Kohat 19/04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17 45. Mr. Johanzeh Khan B.A.L.L.B 20/09/1967 Peshawar 04/04/2003 BPS-17	39 Mr. Zuingar Air Knan	I.B.A.L.L.M				
41. Mr. Saeed Naeem B.A.L.L.B 04/02/1968 F.R.Balmu 19/04/2002 BPS-17 42. Mr. Kamran Khan Wazir B.A.L.L.B 01/04/1969 Dir (Upper) 19/04/2002 BPS-17 43. Mr. Arif Ullah Shah 3> B.A.L.L.B 01/04/1965 Kohat 30/04/2002 BPS-17 44. Mr. Farmanullah M.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 25/12/1967 Peshawar 04/04/2003 BPS-17	40 Mr. Sibghatullah	M.A.L.L.B				
42. Mr. Kamran Khan Wazir O.M. O.M. <th< td=""><td>41 Mr. Saeed Naeem</td><td></td><td></td><td></td><td></td><td></td></th<>	41 Mr. Saeed Naeem					
✓ 43. Mr. Arif Ullah Shah 5.2 M.A.L.L.B 15/01/1965 Konat 19/04/2002 BPS-17 44. Mr. Farmanullah M.A.L.L.B 20/09/1967 D.I.Khan 19/04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 25/12/1967 Peshawar 19/04/2003 BPS-17 45. Mr. Johanzeb B.A.L.L.B 25/12/1967 Peshawar 04/04/2003 BPS-17	42 Mr. Kamran Khan Wazir		01/04/1969			BPS-17
44. Mr. Farmanullah INV.04 INV.04/2002 BPS-17 45. Mr. Muhammad Jehanzeb B.A.L.L.B 20/09/1967 Peshawar 19/04/2002 BPS-17 45. Mr. Johanzeb B.A.L.L.B 25/12/1967 Peshawar 04/04/2003 BPS-17	7 43 Mr. Arif Ullah Shah	MALLB	15/01/1965			BPS-17
45. Mr. Muhammad Jehanzeb B.A.L.L.B 25/12/1967 Peshawar 04/04/2003 BPS-17	44 Mr. Farmanullah		20/09/1967			
A CANAR Johanzeh Khan	45 Mr. Muhammad Jehanzeb			Peshawar		
	46. Mr. Jehanzeb Khan		08/06/1967	Peshawar	04/04/2003	
40. Mr. Som B.A.L.L.B 08/09/1997	40. This obstact labal	B.A.L.L.B	00/00/100/			

R/37

47. Mr. Shehzad Iqbal

....

(14)

16

10



48. Mr. Qadir Baksh	B.A.L.L.B	05/09/1959			
49. Mr. Fazal Noornai	DALLD	01/03/1939	D.I.Khan	11/07/2003	BPS-17
50. Mr. Arif Bilal	B.A.L.L.B	23/03/19/0	Peshawar	04/04/2003	BPS-17
51. Mr. Zahid Amin	B.A.L.L.B	20/04/1972	Peshawar	04/04/2003	BPS-17
52. Mr. Attaullah Shah	B.A.L.L.B	25/11/1968	Mardan	28/03/2003	BPS-17
53. Mr. Faheem Khan	B.A.L.L.B	03/03/1969	Lakki Marwatt	08/04/2003	BPS-17
54. Mr. Jamshed Khan	M.A.L.L.B	15/08/1965	Kohat	07/04/2003	BPS-17
55. Malik Zaheer-ud-Din Babar	B.A.L.L.B	12/07/1968	Charsadda	04/04/2003	BPS-17
56. Mian Shahid-ur-Rehman	B.Sc.L.L.B	06/10/1971	Kohat	26/09/2003	BPS-17
57. Mr. Muhammad Zulfiqar Ali	B.A.L.L.B	20/04/1968	Nowshera	· 23/09/2003	BPS-17
58. Mr. Muhammad Ayub	B.A.L.L.B	12/11/1968	Peshawar	07/04/2003	BPS-17
59. Mr. Saqib Sultan Jadoon	B.A.L.L.B	27.02/1971	D.I.Khan	27/09/2003	BPS-17
60. Mr. Irshadullah	B.A.L.L.B	01/01/1966	Abbotlabad	16/09/2003	BPS-17
61. Mr. Muhammad Irshad	B.A.L.L.B	05/12/1970	F.R.Kohat	22/09/2003	BPS-17
62. Mr. Bashir Muhammad	M.A.L.L.B	05/11/1960	Bajawar Agency	23/09/2003	BPS-17
63. Mr. Muhammad Litaf Khan	B.A.L.L.B	13/02/1971	Mansehra	16/09/2003	BPS-17
64. Mr. Muhammad Khalid	B.A.L.L.B	20/08/1969	Momand Agency	24/09/2003	BPS-17
65. Mr. Rast Baz Khan	B.A.L.L.B	21/02/1959	l Peshawar	16/03/2003	BPS-17.
66. Mr. Alamzeb	B.A.L.L.B	12/12/1959	Bannu	11/07/2006	BPS-17
67. Mr. Nawab Zarin	B.A.L.L.B	13/11/1968	Dir (Upper)	28/02/2004	BPS-17
68. Mr. Azmat Ghafoor	B.A.L.L.B	30/05/1952	F.R.Bannu	18/02/2004	BPS-17
69. Mr. Shujat Ali Khan	B.A.L.L.B		Peshawar	22/12/2001	BPS-17
70. Mr. Attaullah Khan	B.A.L.L.B	01/01/1951	Swat	23/09/1983	BPS-16
71. Mr. Akbar Khan	B.A.L.L.B.	08/09/1951	Peshawar	01/01/1977	BPS-16
72. Mr. Rab Nawaz		06/05/1948	Peshawar	16/02/1984	BPS-16
73. Mr. Sher Zaman	B.Sc.L.L.B	22/06/1952	Peshawar	17/04/1978	BPS-16
74. Mr. Muhammad Qaiser	B.A.L.B	20/05/1952	Mardan	08/03/1988	BPS-16
75. Mr. Kiramatullah	B.A.L.L.B	02/12/1956	Charsadda	22/02/1988	BPS-16
76 ^L Mr. Abdur Rauf	B.A.L.L.B	02/08/1958	Lakki Marwatt	01/12/1982	BPS-16
	B.A.L.L.B	06/05/1947	Swat	12/10/1989	BPS-16

÷ .

					BPS-16	
77. Mr. Abdus Salam	B.A.L.L.B	06/06/1955	Swat	01/08/1987		4
78. Mr. Zulfiqar Ahmad	B.A.L.L.B	21/04/1958	Abbottabad	11/05/1991	BPS-16	
79. Mr. Muhammad Khalid	B.A.L.L.B	04/01/1954	Abbottabad	11/05/1991	BPS-16	
80. Mr. Perwaish Khan	B.A.L.L.B	14/05/1949	Buner	06/01/1992	BPS-16	-
81. Mr. Mir Muhammad Shah	B.A.L.L.B	04/04/1949	Chitral	09/07/1991	BPS-16	
82. Mr. Saeed Gul	M.A.L.L.B	18/04/1954	Hazara	29/06/1992	BPS-16	
83. Mr. Ibrahim Khan	M.A.L.L.B	20/04/1956	Swat	07/01/1992	BPS-16	- R.H. B. M.
84. Mr. Latif Khan	B.A.L.L.B	1 <u>5/11/1948</u>	Peshawar	27/12/1995		
8. Mr. Pervaiz Khan	B.A.L.L.B	01/04/1955	Mardan	18/04/1996	BPS-16	† -
86. Mr. Imran Shah	B.A.L.L.B	20/04/1959	Dir	21/09/1997	BPS-16	-
87. Mr. Muhammad Saleem	B.A.L.L.B	14/09/1959	M. Agency	24/09/1997	BPS-16	
88. Mr. Javed Hussain	B.A.L.L.B	10/10/1961	Chitral	06/10/1997	BPS-16	
89. Mr. Muhammad Zahoor	B.A.L.L.B	05/05/1958	Lakki Marwatt	17/01/1987	BPS-16	· •
1.90. Mr. Abdul Hameed Shah	B.A.L.L.B	03/08/1947	Lakki Marwatt	04/07/1994	BPS-16	-
91. Mr. Abdul Shahkoor	B.A.L.L.B	06/02/1954	Mansehra	20/02/1993	BPS-16	<u>.</u>
 92. Mr. Qazi Aftab Ahmad 	B.A.L.L.B	19/05/1956	Haripur	04/07/1997	BPS-16	
93. Mr. Muhammad Azam Awan	B.A.L.L.B	05/12/1948	Haripur	17/10/1978	BPS-16	: -
94. Mr. Abdul Hameed	M.A.L.L.B	01/04/1952	Abbottabad	13/12/1997	BPS-16	• ••
95. Mr. Muhammad Saeed	B.A.L.L.B	16/07/1949	Kohat	24/08/1983	BPS-14	
	B.Sc.L.L.B	01/02/1949	Peshawar	05/12/1976	BPS-14	
	B.Sc.L.L.B	01/01/1955	Peshawar	01/07/1977	BPS-14	
97. Mr. Pervaiz Ilahi	B.A.L.L.B	20/03/1951	Peshawar	11/07/1977	BPS-14	
98. Mr. Arbab Bashir	B.A.L.L.B	07/09/1949	Feshawar	14/03/1978	BPS-14	
99. Mr. Attiq Ur Rahman			Peshawar	13/03/1988	BPS-14	
100 Mr. Zulfiqar Khan	B.A.L.L.B	02/04/1956	Peshawar	23/04/1988	8PS-14	
101 Mr. Jamal Khattak	B.A.L.L.B	13/04/1961		06/11/1994	BPS-14	
102 Mr. Muhammad Fayaz	B.A.L.L.B	01/05/1951	Malakand	31/10/1982	BPS-14	
103 Mr. Israr Ali	B.A.L.L.B	15/02/1957	Dir (Lower)	29/01/1984	BPS-14	1
104 Mr. Anees Ahmad Jan	B.A.L.L.B	26/04/1958	Mansehra	17/09/1989	BPS-14	
105 Mr. Iltaf Hussain	B.A.L.L.B	12/02/1961	D.I.Khan	11/03/1303		-

÷

·

P/39

	B.Sc.L.L.B	26/10/1965	F.R.Bannu	08/04/1999	BPS-14
135 Mr. Zia Ullah Wazir	B.SC.L.L.D B.A.L.L.B	10/02/1969	Swabi.	10/04/1999;	BPS-14
136 Mr. Khalid Khan	B.A.L.L.B	01/04/1970	D.I.Khan	02/04/1999	BPS-14
137 Mr. Tasawar Hussain	M.A.L.L.B	19/12/1966	Bannu	08/04/1999	BPS-14
138 Mr. Aman Ullah	B.A.L.L.B	19/01/1968	Dir (Lower)	05/04/1999	BPS-14
139 Mr. Muzaffar Ahmad	B.A.L.L.B	05/12/1964	Dir (Upper)	06/04/1999	BPS-14
140 Mr. Syed Falak Sair	B.A.L.L.B -	02/09/1965	Mardan	05/09/1999	BPS-14
141 Mr. Javed Rehman	, U.A.L.L.		1.		

 (\mathcal{O})

21 Director General Prosecution NWFP

2.4

H

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.912/ 2013

Pervez Khan, Deputy Public Prosecutor, SwabiAppellant

<u>VERSUS</u>

The Chief Secretary Khyber Pakhtunkhwa and othersRespondents

WRITTEN REPLY / COMMENTS ON BEHALF OF RESPONDENTS 1, 2 & 5

PRELIMINARY OBJECTIONS:-

- 1. That appellant has got no cause of action.
- 2. That the appeal is not maintainable in the present form.
- 3. That the Appellant has got no locus standi to bring the appeal in hand.
- 4. That this Honourable Tribunal has got no jurisdiction to entertain the instant appeal.
- 5. That the present petition is not maintainable in the eye of law.
- 6. That the Appellant is estopped by his own conduct to file the present appeal.
- 7. That the Appellant has not approached this Tribunal with clean hands.
- 8. That the Appellant has concealed material facts from this Tribunal.
 - The appeal is bad for non-joinder and mis-joinder of necessary parties. It is, however, pertinent to mention that the appellant has not bothered to implead the police department as necessary party.

FACTS:-

<u>9</u>:

Respectfully Sheweth,

- 1. Reply to this para pertains to record hence needs no comments.
- 2. As replied vide para-1 of the facts.
- 3. As replied vide para-1 of the facts.
- 4. Pertains to record.
- 5. After the enforcement of Police Order 2002, and devolution of Power Plan 2001, Prosecution Branch of Police Department was abolished and the employees of Legal Branch alongwith their Posts and Budget were to

transferred initially to Law Department and subsequently to the Home & Tribal Affairs Department Khyber Pakhtunkhwa. It is further clarified that the terms and conditions of services of transferee employees were regulated in Law Department under the Service Rules known as Khyber Pakhtunkhwa Government Pleaders Prosecutors and (Appointment) Rules, 1978 (Annexure-A). In the said Rules there were two categories of the officers namely Public Prosecutor / Government Pleader (BS-18) and Additional Public Prosecutor / Additional Government Pleader (BS-17). Thus the Notification issued by the Law Department and relied upon by the appellant **Annexure-E** was issued in deviation of Rules referred to above, therefore, is / was having no binding effects on the respondents.

6. Correct to the extent that the post of Deputy Public Prosecutor is / was in BS-17 under the Khyber Pakhtunkhwa Prosecution Service Rules, 2005 (Annexure-B). However, the appellant on transfer to Home Department was in BS-16, therefore, he was re-designated as Assistant Public Prosecutor (BS-16) in line with the statutory requirement of Khyber Pakhtunkhwa Prosecution Service Rules, 2005.

7. The assertions of the appellant are incorrect and unfounded. The post of Deputy Public Prosecutor was already in BS-17, under the Khyber Pakhtunkhwa Prosecution Service Rules, 2005.

8. As replied vide para-7 above.

9. The assertions of the appellant are incorrect and unfounded. Moreover, the case of the officer alongwith other eligible officers was placed before the Departmental Promotion Committee for consideration of promotion under the Khyber Pakhtunkhwa Prosecution Service Rules, 2005 and thus the appellant being fulfilled the criteria was promoted from BS-16 to BS-17 by the Home & Tribal Affairs Department (Annexure-C). Accordingly the appellant assumed his charge in BS-17 and thus he has estopped by his own conduct to file the present service appeal. Furthermore, as replied vide para-5 above.

10.As replied vide paras-5 & 9 above.

11.Since the request of the appellant was against the Khyber Pakhtunkhwa Prosecution Service Rules, 2005, therefore, the same was not entertained by the competent authority.

12.As replied vide para-11 above.

13. Incorrect. Those officers who fulfilled the criteria as laid down in the Khyber Pakhtunkhwa Prosecution Service Rules, 2005 were considered for promotion, therefore, the appellant has not been discriminated.

GROUNDS:-

A. Pertains to record.

B. Pertains to record.

C. Incorrect. Names of the officers mentioned in this para are fulfilling the laid down criteria for promotion under the Khyber Pakhtunkhwa Prosecution Service Rules, 2005, and were considered for promotion by the Provincial Selection Board, subsequently the recommendations of the PSB were approved by the competent authority and the officers were promoted to BS-

19. This para has no relevancy with the service appeal of appellant.

D. Incorrect. As replied vide para-C above.

E. Incorrect. As replied vide para-C above

F. Incorrect. The appellant has not been discriminated. Rest of the para is

having no legal substance, thus the same cannot be acted upon.

G. Legal.

H. The appellant has got no case what to talk of other grounds. The appeal is having no legal substance.

PRAYERS

In wake of the above submissions the appeal of the appellant is meritless, therefore, the appeal may kindly be dismissed with special cost.

Chief Secretary Khyber Pakhtunkhwa (Respondent No.1)

Director General Prosecution Khyber Pakhtunkhwa (Respondent No.5)

Secretary Home Department Khyber Pakhtunkhwa (Respondent No.2)

Ama A

North-West Frontier Province Public Prosecutors and Government Pleaders (Appointment) Rules, 1978

[Gazette of N.W.F.P., Extraordinary, 4th April 1979]

No. S.O. R. II (S&GAD) 2-7/78.—In exercise of the powers conferred by section 26 of the North-West Frontier Province, Civil Servants Act, 1973, (N.W.F.P. Act XVIII of 1973), the Government of the North-West Frontier Province, is pleased to make the following rules, namely:-

1. (1) These rules may be called the North-West Frontier Province Public Prosecutors and Government Pleaders (Appointment) Rules, 1978.

(2) They shall come into force at once.

2. The method of recruitment, minimum qualifications, age limit and other atters related thereto for the posts shall be as given in the Schedule annexed.

APPENDIX TO THE NORTH-WEST FRONTIER PROVINCE PUBLIC PROSECUTORS AND GOVERNMENT PLEADERS (APPOINTMENT) RULES, 1978

S. No	Nomenclature of post	Method of recruitment	Minimum qualifications prescribed for initial recruitment	Minimum and Maximum age limit for initiai recruitment
	Public Prosecutor / Government Pleader	 (1) 75% of the posts by promotion from among Additional Public Prosecutor / Additional Government Pleaders having 5 years service as such. (2) 25% of the posts by initial recruitment. 	A degree in Law (B.A/B.Sc., L.L.B) with 5 years Standing at the Bar.	30 years 40 years
	Additional Public Prosecutor/ Additional Government Pleader.	By initial recruitment	A degree in Law (B.A/B.Sc., L.L.B.) with 3 years standing at the Bar.	27 years. 35 years.

Annex B

WFP GOVERNMENT GAZETTE, EXTRAORDINARY, 12TH OCTOBER, 2005. 410

-	· · · · · · · · · · · · · · · · · · ·	•			
э. No.	Nomenclature	Scale	Minimum Qualification	Method of appointment	Age Limit
1.	1.DirectorGeneral19Prosecution.		-	i) By promotion from amongst the Public Prosecutors. OR	•
				ii) By transfer from amongst the Officers of PCS/DMGs.	
2.	Director Administration	18	-	i) By transfer from amongst the Public Prosecutors. OR	-
4				ii) By transfer from amongst the Officers of PCS/DMGs.	
3: .	Director Legal	18	•	By transfer from amongst the Public Prosecutors.	· - ·
4.	Public Prosecutor	-18		By promotion from amongst the Deputy Public Prosecutors.	
5.	Deputy Public Prosecutor	17	Law Graduate at least 2 rd division from recognized	i) 50% by promotion from amongst the Assistant Public Prosecutors.	• • •
7-			University.	ii)50% by initial recruit-ment through Public Service Commission.	-
6.	Assistant Director Admn-cum- Finance	17	•	By transfer from amongst the Deputy Public Prosecutors.	-
	Assistant Public Prosecutor.	16	Law Graduate at least 2 nd division from recognized University	Initial recruitment through Public Service Commission.	23-32 years

11. Eligibility Requirements:

- i) A person shall be eligible to be appointed as Ass ant Public Prosecutor whopossesses a Law Degree from a recognized university.
- ii) The age limit for a person to be appointed as Assistant Public Prosecutor shall be from 23 to 32 years.

12. Promotion.

Subject to the availability of posts:

- i) √ Promotion of BPS 19 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-18, subject to completion of at least 12 years service in BPS 17 & 18.
- ii) Promotion to BPS 18 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-17, subject to completion of at least 05 years service in BPS 17.
- iii) Promotion to BPS 17 shall be on the basis of seniority-cum-fitness from amongst the officers in BPS-16, subject to completion of at least 05 years service in BPS 16 and qualifying of the departmental promotion exam.
- Method of recruitment Age Minimum Qualification Scale Nomenclature S. Limit of post No. By initial recruitment 23-32 B.A. with Diploma in 16 Librarian. 1. years through PSC. Library Science. By promotion on the 16 Office 2. basis of seniority-cum-Superintendent fitness from amongst -cumthe Assistants with at Accountant least 10 years service as such.
- 13. Method of appointment and promotion of ministerial staff.

NOTIFICATION

<u>No.SO(Prosecution)HD/1-10/2011:</u> The Competent Authority on the recommendation of the Departmental Promotion Committee (D.P.C) is pleased to promote the following Assistant Public Prosecutors (BS-16) to the post of Deputy, Public Prosecutor (BS-17) from S.No. 1 to 13 on regular basis and from S.No. 14 to 24 on acting charge basis, with immediate/effect in the public interest.

Amia

REVBER PAKHTUNKHWA

DEPARTMENT.

S.No.	Name of Officer
1.	Mir. R. b Nawaz
2.	Mir, Sher Zaman
3	Sir, Mahammad Quiser
	afr. Koramifiaha
5.	Mr. Abdul Salam
6.	Mr. Breahini Khan
7.	[alr.Pervez Khail]
8.	Mr: Muhaminad Zahoor
9.	Mr. Qazi Aftab Abmad
10.	Mr. Muhammad Saleem
11.	Mr. horan Shab
12.	Mr. Javed ilussain Mughai
13.	Mr. Abdul Han id
14.	Mr. Zulfiger Khan
15.	Mr. Pervez Hahi
16.	Mr. Is ar Ali
17.	Mr. An & Ahbad Jae
18.	Mr. Altaf Hussain
-19.	Mr. Fa cale Hadi
20.	Mr. MartažaShah
21.	Mr. Steikh Zahoor Ahmad
22.	Mr. Ifaf Hussain Akhtar
23.	Mr. Claangaiž Khan
2.1.	Mr. Mahammad Nisar

Before The Service Tribunal, Peshawar.

Service Appeal No.912/2013

Hearing 24.11.2015

Pervez khan V/S

The Chief Secretary etc;

Rejoinder:-

INDEX

S.NO	DESCRIPTION	ANNEXURE NO.	PAGE NO.S
1	Rejoinder.		12
2	Affidavit.		3

Total:

3

Dated: 23.11.2015

Appellant 23 (Pervez khan) $\frac{23}{2}$

Though:-Telian Muhammad Adam khan

Advocate, Mardan.

MUHAMMAD ADAM KHÂN B.A LLE Advocau. High Cown Mardall

Before The Service Tribunal, Peshawar.

Service Appeal No.912/2013

Hearing 24.11.2015

Pervez khan V/S The Chief Secretary etc;

All the preliminary objections are incorrect and false. Denied

Facts:-

- 1 to 4. Based on malice. All the relevant records are in the custody of Respondents. While, the facts as mentioned in Para-1 to 4 of the memo; of appeal are correct.
- Incorrect and based on malice on the part of Respondents. Denied. The right accrued to a civil servant cannot be denied under a repelling enactment.

6 to 13. Incorrect and misleading. Denied.

Grounds:-

A to B: Misleading. The relevant record is in the custody of Respondents. Denied.

C to F: Incorrect and misleading. Denied.

G. Needs no further reply.

H. Incorrect and false. Denied.

It is prayed that on acceptance of this Appeal, the Appellant may be ordered to be considered as Public Prosecutor (BPS-18) with back service and financial benefits and resultant revision of pensionary benefits.

The costs of this Appeal may also be awarded in favour of Appellant against the Respondents.

Dated: 23.11.2015

Appellant

(Pervez khan) Though:-

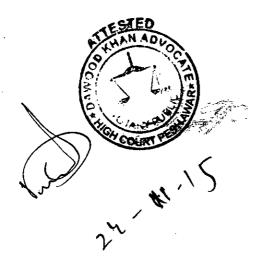
MUHAMMAD ADAM KHAN-B.A LLB Advocate High Court Mardate

AFFIDAVIT

I, Pervezkhan/ Appellant state on solemn affirmation that as per my client that the contents of the accompanied rejoinder, are true and correct to the best of my knowledge and belief and that nothing is concealed from this Hon,ble Tribunal, in this respect.

Deponent²³[11/15.

(Pervezkhan)



67579 **ت**ونخواه باروكس أبارا يسوى أي پشاور بارا یسوسی ا^م دابطغ بعدالت جماب KPK. (منجانب: ويرعان ايسلن *بر*م: تحاية. مقدمه مندرجه عنوان بالا میں اپنی طرف سیے داسطے پیر دی وجواب د پی کاردائی متعلقہ الن مقام بي مر لي م فل بيت رو د كيل مقرر UQ کر کے افرار کیاجاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاردائی کا کامل اختیار ہوگا، نیز دکیل صاحب کو راضی نامه کرنے وتقرر ثالث و فیصله برطف د سینے جواب دعوی اقبال دعوی اوردر فواست از مرقم کی تصدیل زریں پرد بخط کرانے کا اختبار ہوگا، نیز بصورت مدم پیردی یاد گری کیفرد یا ایک کی کرامیڈ کی اور منہونی، نیز دائر کرنے امل نگرانی ونظر ثانی و پیروی کرشنے کامخار ہوگا ادر بسورت ضرورت مقدمہ مذہورہ کے کل یاجزوی کاروائی کے داسط اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب مقرر شده کوبھی دیمی جملہ б {б. ~ رہ اختیارات کا میں ہوں کے اور اس کا ماختہ پر داختہ منظور دقبول ہو گا دوران مقدمہ ی*ل جونز چه ہرج*انہ سے ہوگا و، وکیل موسوف وسول رفت کا حقدار ہو گا کوئی تاریخ بیشی مقام dr. دوره يا مدى بالمربوتود كمل صاحب پابند نه بول خرك مرد من مرور م دوره يا مدے باہر ہوتود كمل صاحب پابند نه بول خرك كردى مذكوره كريں، لېذا وكالت نامه لكھ ديا تاكه مندر ہے ۔ المرقم: <u>6/09/016</u> fr مقام کے لیے منظ Accepted. لوت اس وكالت نامدكي فولو كاني نا قابل قبول بدوكي Advocate 16/09/016

BEFORE THE SERVICE TRIBUNAL, PESHAWAR

Appeal No.912 /2013

dated of hearing :24.10.2016

Parvez Khan

The Govt: of KPK / Prosecution Deptt: etc

-----Versus

SERVICE APPEAL

WRITTEN ARGUMENTS ON BEHALF OF APPELLANT :

The appellant was appointed as prosecuting Subinspector (BPS-II) in the police department on 13.05.1988. His salary was, later on fixed in BPS-14.

He passed the upper course training with credit in the year 1989 .(Copies is attached as annexure "A" & "B") on the file.

The appellant's name was placed in "F" list in 1991 (annexure "C") on the file.

The appellant was due for promotion to the post of PDSP (BPS-17) when prosecution Department was established in the year 2002.

Resultantly, the appellant along with other employees of the Prosecution Branch was transferred to Law Department and thereafter, to the Home Department in the year 2003. (copy annexure "D") on the file.

The appellant was Designated as Deputy Public Prosecutor vide dated 27.09.2004. (Copy is annexure "E").

The post of the Deputy Public Prosecutor was placed in BPS-17 vide notification dated 24.09.2005 . (Annexure "F").

The appellant along with his other colleagues approached the Government of KPK/ The Chief Minister for the upgradation of the post of the Deputy Public Prosecutor to BPS-17, which was accepted vide notification dated 10.08.2009 (copy attached herewith). But , inspite of upgradation of the post of Deputy Pubic Prosecutor to BPS-17 , the appellant was deprived form the benefits thereof and he was kept in PBS-16.

The appellant after passing the Department Examination in 2012 was again ordered to the Promotion as Deputy Public Prosecutor in the year 2012, inspite of the fact that he had already been posted as such in the year 2003 The appellant represented for the restoration of his designation and salary as the Deprese Public Prosecutor (BPS-1%(vide application dated 07.01.2013, and on the alternate, for promotion as such. (copy is attached as annexure "G").

Being the verge of retirement i.e on 31.03.2013. The appellant submitted another application dated 07.01.2013 and 22.02.2013, to respondent No.1, for the aforesaid purpose .(Annexure "G" and "H").

The secretary / respondent No.02 rejected both the aforesaid applications on 15.03.2013. (Copy is annexure "I").

A number of employees of the prosecution Department are granted promotion in the higher pay scales at the time of their retirement from service but the appellant is discriminated in this respect.

<u>GROUNDS:-</u>

A. That the appellant had completed twenty five (25) years service in police Department ,Law Department and Prosecution Branch of Home and Tribal Affairs, Department , KPK , Peshawar with clean and unblemished records.He retired from service on attaining the age of superannuation on 31.03.2013.

B.That appellant, at the time institution of the writ petition, was at the verge of retirement from service on attaining the age of superannuation on 31.03.2013.

C.That number of Assistant Public <u>a</u> Prosecutors whom appointed in BPS-14 and later on Up-graded to BPS-16, had claimed the grant of BPS-17 with effect of 29.05.2004 the basis of notification of KC on SO (FR)FD/7-9/ APP dated 09.08.2010. In the Peshawar High Court to W.P No 241/2011 dated 21.11.2013. Which was accepted but the benefits were allowed from 2010, Copy of judgment enclose herewith for yours kind perusal .But these petitioners were appointed years back as against appellant that is

between 2004 and 2010 as Assistant Public Prosecutor but the appellant was holding the Post of Deputy Public Prosecutor since 2003, hence the appellant is entitled to BPS-17 since 2003.

- D.That the post of Deputy Public Prosecutor is upgraded to BPS-18 while the post of Public Prosecutor is upgraded to BPS-19 during pendency of the present appeal.
- E. That the District Public Prosecutors namely Sahibzada Sikandar, Muhammad Fahim , Attaullah Khan and so many other officers were given promotion to the next higher scale just to avail pecuniary benefits of the promotion , in the higher scale.(Copy of notification is attached as annexure "1" (.)
- F. That Mr. Latif Khan Assistant Public Prosecutor, who was in BPS-16 was promoted to BPS-17 at the time of his refrences inspite of the facts that he hed her fulle effects that

5

¢;

the mandatory requirements for promotion to next higher scale i.e the passing of the departmental promotion examination .(copy of notification is attached as annexure "N"). G.That similarly Mr. Riaz Ul Hassan Assistant Public Prosecutor, who had recently been upgraded from BPS-14 to BPS-16 was also promoted to BPS-17 at the time of his retirement .(Copy is attached as annexure "O"

- & "P").
- H.That beside the accrued right of restoration of promotion of post , i.e DPP the petitioner is entitled to the similar and equal treatment as granted to his other colleagues aforementioned and the refixation of pension in PBS-17 from the year 2003.
- I. That the appellant being at the verge of retirement on 31.03.2013 had no other expeditions and adequate remedy .Hence, he approached the High Court in writ petition which was converted into this service appeal.

As far as the objection as to maintainability of this appeal is concerned, the appellant had approached the Honourable High Court Peshawar for the grant of impugned relief in WP No 1019 /2013. But, the High Court holding that the jurisdiction rests with the Honourable Service Tribunal converted the same as service appeal and sent it to this Honourable Tribunal.

The point of limitation in the case of salary and promotion of civil servant is resolved by this Honourable Tribunal in service appeal No 994 / Naeem / 2004 (Naushad Khan Vs the Secretary etc) decided on 11.12.2012,holding that limitation does not run in the cases involving salary and promotion. (Copy of judgment is attached).

While, the working High Court referring the case of appellant to this Honourable Tribunal

has held that the jurisdiction lies with the service tribunal

It is prayed that on acceptance of this appeal , the appellant may be granted the benefits of BPS -18 and so on with retrospective effect and also the costs of this appeal .

Appellant / Muar Pervez Khan

Through :

Muhammad Adam Khan Advocate High Court

Mardan Adam.

Akbar Khan

Advocate High Court Peshawar

50 16137 ايژوكيپ: باركوسل ايسوى ايشن نمبر: پشاور بارایسوسی ا**ی**شن،^{خه} رابطنمبر: منجاب: مبر ورز عکان (لعیا(سوم) دمونی ا<u>سل</u> مر در مکل علت نمير: 17 مقدمه مندرجه عنوان بالاميں این طرف سے واسطے پیروی د پیواب دہی کاروائی متعلقہ آن مقام مستساحر سي محمد مل خان (مربولمو مل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدہ کی کل کاروائی کا کامل اختیار ہوگا ، نیز وکیل صاحب کو راضی نامه کرنے وتقر رثالث و فیصله بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قشم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا ، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپل کی برآ مدگی اور منسوخی ، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہو گا اور بصورت ضرورت مقدہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقر رکا اختیار ہو گا اور صاحب مقرر شده کو دبی جمله مذکوره با اختیارات حاصل ہو ں گے اور اس کا ساختہ پر داختہ منظور و قبول ہو گا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یابند نہ ہوں گے کہ پیروی مذکورہ کریں ،لہذا وکالت نامہ لکھ دیا تا کہ سند رہے المرقوم کے لیے منظور مقا <u>ٹ: اس د کالت نامہ کی فوٹو کا پی نا قابل قبول ہوگی</u>۔