

08.07.2022

Due to Public Holiday on account of Eid-UI-Adha case  
to come for the same on 13.09.2022

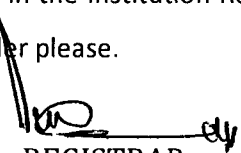
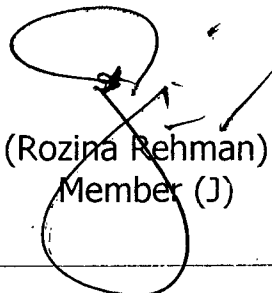
  
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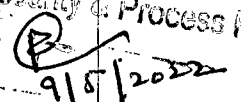
Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 622/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/04/2022	<p>The appeal of Mr. Ghulam Mustafa presented today by Mr. Inyatullah Khan Tareen Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	28.04.2021	<p>Appellant present through counsel. Preliminary arguments heard. Record perused.</p> <p>Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 08.07.2022 before S.B.</p> <p>Annexed with the memo of appeal is an application for interim relief. Notice of this application be issued to the respondents.</p> <p> (Rozina Rehman) Member (J)</p>

Rs. 600/-  
Appellant Deposited  
Security & Process Fee  
  
9/5/2022

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

Service Appeal No. 622/2022.

Ghulam Mustafa **V/S** Divisional Forest Officer, Kunhar  
Watershed Division, Mansehra and  
others.

**SERVICE APPEAL**


**INDEX**

Sr. No:	Description of Documents	Annexure	Page No:
(1)	Memorandum of Appeal alongwith affidavit, addresses of the parties, certificate & list of Books.	-	01-12
(2)	Stay Application alongwith affidavit	-	13-14
(3)	Copy of said transfer order dated 07-07-2011	"A"	15
(4)	Copies of seniority lists for the years 2012 and onward.	"B"	16-22
(5)	Copy of said seniority list dated 30-06-2021	"C"	23
(6)	Copy of the impugned seniority list dated 18-10-2021	"D"	24
(7)	Copy of department appeal and rejection letter.	"E" & "F"	25-29
(8)	Copies of both the said minutes are respectively.	"G" & "H"	30-35
(9)	Copy of second final seniority list	"I"	36
(10)	Copy of judgment of <i>Shakirullah's</i> case	"J"	37-51
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Dated: 26/4/22

  
Appellant  
(Ghulam Mustafa)

Through:

  
(Inayat Ullah Khan Tareen)  
Advocate High Court.

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

Service Appeal No. \_\_\_\_\_/2022

Ghulam Mustafa Forest Guard, Kunhar Watershed  
Division (KWD), Mansehra presently posted in Bakot  
Forest Range of KWD. ... (Appellant)

VERSUS

1. Divisional Forest Officer, Kunhar Watershed Division,  
Mansehra.
2. Conservator of Forest, Watershed Management Circle,  
Abbottabad.
3. Chief Conservator of Forest, Northern Forest Region-II,  
Khyber Pakhtunkhwa, Abbottabad.
4. Secretary to the Government of Khyber Pakhtunkhwa Forest  
Department, Civil Secretariat, Peshawar
5. Ali Asghar-II, Forest Guard, Kunhar Watershed Division,  
Mansehra ... (Respondents)

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR**  
**CORRECTION OF SENIORITY.**

**PRAYER**

On acceptance of this appeal, it may graciously be held that final seniority list of Forest Guards of Kunhar Watershed Division, Mansehra as it stood on 15.03.2022 and issued by the respondent No. 1 vide his office Endst: No.1318-22/KWM dated 05.04.2022, and similarly the previous final seniority list as it

stood on 18.10.2021 and issued by the same respondent, are wrong to the extent of positioning of the appellant and private respondent No.5, wherein the former has been placed at Sr. No. 5 as against his original seniority position at Sr. No. 4 in the periodical seniority list circulated from time to time prior to the impugned seniority lists, while the latter has been placed at Sr. No. 1 with reliance upon decision of the respondent No. 3 issued vide minutes of meeting dated 25.08.2020 as against his original seniority by which he was placed junior to the appellant throughout in the periodical seniority lists issued prior to the impugned seniority lists; and the respondents No. 2 by his concurrence with the impugned seniority list as stood on 18.10.2021 has wrongly rejected the departmental appeal/representation which was further wrongly upheld by the respondent No. 4 in disregard to the lack of authority of the respondent No. 3 to confer seniority upon Forest Guards who happened to have completed three years tenure continuously in a Division other than parent Division, as evident from the minutes of meeting dated 25.08.2020 issued vide Endst No. 2069-90 dated 16.09.2020 and further evident from the minutes of another meeting issued vide Endst: No. 3146-70 dated 20.10.2020 from the office of respondent No. 3. Consequently, the impugned seniority lists may be set aside to the extent of appellant and the private respondent No. 5 with direction to the respondents to restore the correct and due seniority position of appellant by removal of the name of private respondent No. 5 from Sr. No. 1 and placing the same at old position by reversal of the decision of respondent No. 3 relied for illegal positioning of respondent No. 5 at Sr. No. 1 in the impugned seniority lists.

Any other relief as deemed fit in favor of the appellant may also be granted to meet with the ends of justice.

=====

Respectfully Sheweth,

The appellant seeks to make the following submissions:-

1. That appellant is serving under control of the respondent No. 1 as Forest Guard originally appointed as such in KWD in the year, 1986.
2. That private respondent No. 5 is also serving in KWD as transferee from Daur Watershed Division, Abbottabad. He was transferred in KWD vide office order No. 3 dated 07.07.2011 issued by the Conservator of Forest/PD, Watershed Management Circle, Abbottabad. Copy of said transfer order is **Annexure "A"**.
3. That though private respondent No. 5, being alien in KWD, was not entitled to be accommodated in the seniority of Forest Guards of KWD but his name was included in the said list for unknown reasons. However, the name of said respondent in the seniority lists issued from time to time after his transfer to KWD, ever remained at junior position than the position of appellant. Copies of seniority lists for the years 2012 and onward are **Annexure "B"**.
4. That the private respondent No. 5 was also placed junior to the appellant in the tentative seniority list as stood on 30.06.2021, wherein, the name of the appellant is at Sr. No. 4 while that of the said respondent is at Sr. No. 7. Copy of said seniority list is **Annexure "C"**.

5. That when the final seniority list as stood on 18.10.2021 was issued, the name of the private respondent No. 5 quite surprisingly ascended to Sr. No. in the said list<sup>1</sup> as against Sr. No. 7 in the tentative seniority list while that of the appellant descended to Sr. No. 5 as against Sr. No. 4 in the tentative seniority list. Thus, the appellant suffered due to wrong ascension of the private respondent No. 5 in the impugned seniority list. Copy of the impugned seniority list is **Annexure "D"**.
6. That the appellant preferred departmental appeal before respondent No. 2 for correction of the seniority list dated 18.10.2021 as soon as he got knowledge of the same. He rejected the said appeal on 03.03.2022 but rejection letter was got received from the appellant on 12.03.2022. Copy of department appeal and rejection letter are respectively **Annexure "E" and "F"**.
7. That appellant stood prejudiced by decision of respondent No. 3 disseminated vide the minutes of meeting dated 25.08.2020 issued under Endst No. 2069-90 dated 16.09.2020 and further modified in the minutes of another meeting issued vide Endst: No. 3146-70 dated 20.10.2020 from the office of respondent No. 3. Copies of both the said minutes are respectively **Annexure "G" and "H"**.
8. That seniority of private respondent No. 5 in the impugned final seniority list dated 18.10.2021 was restored with reliance

upon decision of respondent No. 3, therefore, an appeal was also made to respondent No. 4 and maybe under direction of latter or for some other reasons, another final seniority list as stood on 15.03.2022 was circulated on 05.04.2022 by the respondent No. 1 with similar seniority position of the respondent No. 5 and of the appellant respectively at Sr. No. 1 and 5 with similar reliance upon decision of respondent No. 3. Copy of second final seniority list is **Annexure "I"**.

9. That appellant seeks to impugn the first and second final seniority lists as well as decision of respondent No. 3, inter alia, on the grounds as follow hereinafter:-

## GROUND

- A. That fixation of seniority in civil service depends upon the law and rules in force and a departmental authority is not vested with any power to make any policy or give guidelines for determination of seniority of a cadre or post in deviation from the law and rules on the subject. In the case of appellant and private respondent No. 5 as factually discussed herein above, impugned determination of seniority has taken place in pursuance to the guidelines provided by respondent No. 3 in minutes of meeting (**Annexure G & H**). The said respondent has got no lawful authority to frame policy guidelines with a design as they exist in the said minutes of meeting, which on their face are *ultra vires*, imbued with malice in fact and malice



KWD whose seniority was already long settled and as such, he was placed junior to the appellant and others without disturbing the long settled seniority position.

- D. That the private respondent No. 5 acquiesced in the seniority lists of Forest Guards of KWD revised and issued periodically since his transfer in KWD in 2011 and he never raised an objection to claim seniority on the basis of his appointment in Daur Watershed Division, Abbottabad. Because of his being transferee/intervener, the appointment of private respondent No. 5 notwithstanding its being prior in time to appointment of the appellant could not give him a right to get seniority against the appellant. After a long time of acquiescence of the respondent No. 5, he has been wrongly given benefit of unlawful policy introduced by respondent No. 3 against the facts and law. Therefore, the appellant is entitled to find place in the impugned list according to his correct position by reversal of the seniority of respondent No. 5 to his old position as it happened before issuing of the impugned seniority lists.
- E. That any other ground found necessary will be raised during the course of arguments with permission.
- F. That this appeal is within time from the impugned seniority list as stood on 15.03.2022, circulated on 05.04.2022 and got received from the appellant on 12.04.2022 and this Honourable Tribunal has got jurisdiction to adjudicate upon the facts in issue and law stated herein above.

With the foregoing facts and grounds, it is requested that appellant's appeal may graciously be accepted as per prayer in the heading above.

Dated 26/04/2022

  
**APPELLANT**

Through:



**Inayatullah Khan Tareen**  
Advocate High Court,  
At Peshawar  
Cell Ph#03325700875

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

Service Appeal No. \_\_\_\_\_/2022

Ghulam Mustafa Forest Guard, Kunhar Watershed  
Division (KWD), Mansehra presently posted in Bakot  
Forest Range of KWD . ... (Appellant)

**Versus**

The Division Forest Officers KWD and 04 others .... Respondents

**AFFIDAVIT**

I, Ghulam Mustafa the above named appellant do  
hereby declare on solemn affirmation that contents of  
the accompanying appeal are true and correct to the  
best of my knowledge and belief and nothing has been  
kept concealed.

Dated 26/04 /2022



**DEPONENT**

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

Service Appeal No. \_\_\_\_\_/2022.

Ghulam Mustafa **V/S** Divisional Forest Officer, Kunhar  
Watershed Division, Mansehra and  
others.

**SERVICE APPEAL**

**ADDRESSES OF THE PARTIES**

**(Appellant)**

Ghulam Mustafa Forest Guard, Kunhar Watershed  
Division (KWD), Mansehra presently posted in Bakot  
Forest Range of KWD . ...

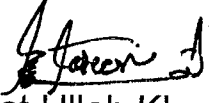
**(Respondents)**

1. Divisional Forest Officer, Kunhar Watershed Division,  
Mansehra.
2. Conservator of Forest, Watershed Management Circle,  
Abbottabad.
3. Chief Conservator of Forest, Northern Forest Region-II,  
Khyber Pakhtunkhwa, Abbottabad.
4. Secretary to the Government of Khyber Pakhtunkhwa  
Forest Department, Civil Secretariat, Peshawar
5. Ali Asghar-II, Forest Guard, Kunhar Watershed Division,  
Mansehra

Dated: 26/4/22

  
Appellant  
(Ghulam Mustafa)

Through:

  
(Inayat Ullah Khan Tareen)  
Advocate High Court.

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

Service Appeal No. \_\_\_\_\_/2022.

Ghulam Mustafa V/S Divisional Forest Officer, Kunhar  
Watershed Division, Mansehra and  
others.

**SERVICE APPEAL**


**LIST OF BOOKS**

- (1) Servant Act 1974.
- (2) K.P.K. Services Rules E&D 2011.
- (3) Other Ruling of High Courts, Superior Courts and Service Tribunal will be cited at the time of hearing.

Dated: 26/4/22

  
Appellant  
(Ghulam Mustafa)

Through:

  
(Inayat Ullah Khan Tareen)  
Advocate High Court.

P/12

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

Service Appeal No. \_\_\_\_\_/2022.

Ghulam Mustafa V/S Divisional Forest Officer, Kunhar  
Watershed Division, Mansehra and  
others.

**SERVICE APPEAL**


**CERTIFICATE**

It is certified that the appellant prefers the accompanying first appeal before this Honourable Tribunal. The Appellant did not file any appeal in this Honourable Tribunal.

Dated: 26/4/22

  
Appellant  
(Ghulam Mustafa)

Through:

  
(Inayat Ullah Khan Tareen)  
Advocate High Court.

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

Service Appeal No. \_\_\_\_\_/

Ghulam Mustafa                      V/S      Divisional Forest Officer & others.

**SERVICE APPEAL**

-----  
APPLICATION FOR      SUSPENSION OF IMPUGNED  
SENIORITY LISTS REFERED UNDER THE HEADING OF  
PRAYER OF MAIN SERVICE APPEAL AND GRANT OF  
STAY AGAINST THE IMPUGNED SENIORITY LISTS  
TILL THE FINAL DECISION OF MAIN APPEAL.  
-----


Respectfully Sheweth:-


1. That the Applicant/appellant has today filed the above titled Service appeal, the contents of the same may graciously be read as an integral part of this Application.
2. That the Applicant/Appellant preferred the service appeal on credible, cogent and authentic grounds and hops for success.
3. That the Applicant/Appellant has a good prima facie case and balance of convenience also tilts in his favour.
4. That in case of non suspension and non grant of stay order against the impugned seniority lists, the applicant/appellant will suffer an irreparable loss. .

It is therefore, respectfully prayed that the impugned seniority lists referred under the heading of "Prayer" of main appeal may graciously be suspended and stayed till the decision of main Service Appeal.

Dated: 26/4/22

Through:

  
Applicant/Appellant  
(Ghulam Mustafa)

  
(Inayatullah Khan Tareen)  
Advocate High Court  
at Haripur.

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

Service Appeal No. \_\_\_\_\_/

Ghulam Mustafa      V/S      Divisional Forest Officer & others.


**SERVICE APPEAL**

-----  
APPLICATION FOR    SUSPENSION OF IMPUGNED  
SENIORITY LISTS REFERED UNDER THE HEADING OF  
PRAYER OF MAIN SERVICE APPEAL AND GRANT OF  
STAY AGAINST THE IMPUGNED SENIORITY LISTS  
TILL THE FINAL DECISION OF MAIN APPEAL.  
-----


**AFFIDAVIT:**

I, Ghulam Mustafa, Forest Guard, Kunhar Watershed Division (KWD),  
Mansehra, presently posted in Bakot Forest Range of KWD, do hereby  
solemnly affirm and declare on oath that the contents of accompanying  
applicant for grant of stay are true and correct to the best of my  
knowledge and belief and nothing has been suppressed from this  
Honourable Tribunal.

Dated: 26/04/2022.

  
Deponent

Identified by:

  
(Inayatullah Khan Tareen)  
Advocate High Court.



Annex-A P/15

OFFICE ORDER NO. 03 DATED ABBOTTABAD THE 27 JULY, 2011 ISSUED BY  
SARDAR MUHAMMAD SULTAN, CONSERVATOR OF FORESTS/PD WATERSHED  
MANAGEMENT CIRCLE ABBOTTABAD

The following postings/transfers amongst the Forest Guards are hereby made with immediate effect in the interest of public service:-

#	Name of Forest Guard	From	To
1	Mr. Sadaqat Khan	Kunhar Watershed Division, Mansehra	Daur Watershed Division, Abbottabad
2	Mr. Ali Asghar	Daur Watershed Division, Abbottabad	Kunhar Watershed Division, Mansehra

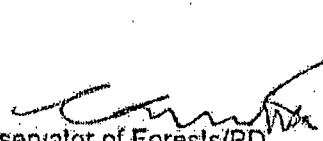
Both the officials will be relieved simultaneously.

Sd/-  
(Sardar Muhammad Sultan)  
Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

No. 42-49 /E-11, dated Abbottabad the 27/07/2011.

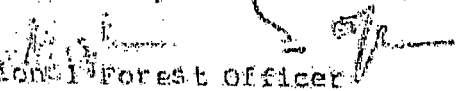
Copy forwarded for information and necessary action to:-


1. The Divisional Forest Officer Kunhar Watershed Division, Mansehra.
2. The Divisional Forest Officer Daur Watershed Division, Abbottabad
3. Office orders file.

  
Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

No. 42 /W.S., dated Mansehra, the 27 /7/2011

Copy forwarded to the Range Forest Officer Bekot Watershed Range for information and necessary action.

  
Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra.

Seen & File  
  
2011.

2002 P/116 Anwar B

ANNUAL LIST OF FOREST GUARD WORKING IN KUNJAL WATERSHED DIVISION AS STOOD ON 30-4-2002

Sl. No.	Name and Designation	Age	Qualification	Domicile	Date of Birth	Date of Original Appointment	Present Appointment
1	Mr. Mohammad Azam	7	Matric	Mansehra	16-8-1950	26-9-73	6.3.93 Selection grade
2	Mr. Samundar Khan	7	-do-	-do-	1-5-52	12.3.77	-do-
3	Mr. Mohammad Manzoor	7	-do-	-do-	13.8.52	12.3.77	-do-
4	Mr. Abdur Rashid	7	-do-	-do-	15.9.52	12.3.77	-do-
5	Mr. Mushraf Hussain	7	Middle	-do-	11.5.53	12.3.77	-do-
6	Mr. Mohammad Harif	7	-do-	-do-	13.1.56	12.3.77	-do-
7	Mr. Mohammad Farooq	7	-do-	-do-	2.2.56	12.3.77	-do-
8	Mr. Rustam Khan	7	Matric	-do-	1.1.57	12.3.77	-do-
9	Mr. Abdul Mateen	7	-do-	-do-	1.3.57	12.3.77	-do-
10	Mr. Sajjad Hussain	7	Middle	-do-	20.12.57	12.3.77	-do-
11	S. Fida Hussain Shah	7	Matric	-do-	2.3.58	12.3.77	-do-
12	Mr. Azizur Rehman	7	Middle	-do-	14-10-58	12.3.77	-do-
13	Mr. Ghulam Samdani	7	Matric	-do-	12.12.58	12.3.77	-do-
14	Mr. Mohammad Zulfiqar	7	-do-	-do-	2.4.54	15.3.77	-do-
15	Mr. Mohammad Sabir	7	Middle	-do-	10.4.59	15.3.77	1.1.97 Selection Grade
16	Mr. Mohammad Ashraf	8	B.A	-do-	30-4-58	16.3.77	1.12.99 Move-over
17	S. Bashir Hussain Shaht	5	Middle	-do-	15.4.55	25.5.77	-
18	Alli Ashgar - I	5	Middle	-do-	20-4-57	22.8.77	-
19	Mr. Shoukat Iqbal	5	Matric	-do-	2.10.57	22.8.77	-
20	Mr. Shamsur Rehman	5	-do-	-do-	1.6.58	22.8.77	-
21	Mr. Habibur Rehman	5	Middle	-do-	4.7.59	22.8.77	-
22	Mr. Maqboolur Rehman	5	-do-	-do-	7.5.68	22.8.77	-
23	Mr. Sultan Mohammad	5	-do-	-do-	30.4.54	31.8.77	-
24	Mr. Mohammad Shabir	5	Matric	-do-	15.5.58	31.8.77	-
25	Mr. Mohammad Zulfiqar	5	Middle	-do-	26.3.59	5.9.77	-

(Cont'd p/2---)

*S. Fida Hussain Shah*

27	Mr. Muhammad Toufique	5	Matric	-do-	10-11.77	10-11.77
28	Mr. Mohammad Pervez-I	5	Middle	-do-	20.5.59	12.12.78
29	Mr. Mohammad Salim	5	Matric	-do-	8.11.59	16.12.78
30	Mr. Jehanzeb-I	5	Middle	-do-	10-4.56	17.3.79
31	Mr. Shebir Hussain	5	Matric	-do-	8.12.59	9.4.79
32	Mohammad Mushtaq	5	Middle	-do-	20.4.57	29.7.79
33	Mr. Mohammad Bakash	5	Matric	-do-	10.4.59	21.6.81
34	S. Sakawat Hussain Sheh	5	-do-	-do-	10.4.63	11.10.82
35	Mr. Amjid Hussain	5	Middle	-do-	17.1.64	11.10.82
36	Mr. Liaqat Ali	5	B.A	-do-	1.1.65	16.6.85
37	Mr. Ghulam Martaza	5	Matric	-do-	15.4.64	7.9.85
38	Mr. Mohammad Pervez-II	5	Middle	-do-	1.4.65	8.9.85
39	Mr. Mohammad Pervez-III	5	-do-	-do-	9.3.66	8.9.85
40	Mr. Ali Asghar-II	5	Matric	-do-	15.5.66	8.9.85 ✓
41	Mr. Ghulam Mustafa	5	-do-	-do-	5.1.64	3.5.86
42	Mr. Jehanzeb-II	5	-do-	-do-	6.8.63	29.1.87
43	Mr. Mufti Mohammad Idress	5	-do-	-do-	1.5.66	29.1.87
44	Mr. Mohammad Shamraz	5	Matric	Abbottabad	12.12.1962	21.4.85
45	Mr. Shakeel Ahmed	5	-do-	-do-	1.4.61	Kept at the tail of Senior list as per C.F.O.O 45 dt: 17.10.95 & O.C 12 dt: 12.8.1997. They have been adjusted defunct Soka Nullah Project. ( as above)
46	Mr. Mohammad Younis	7	Middle	-do-	19.3.1959	25.6.86
47	S. Arshad Hussain Sheh	5	Matric	-do-	8.2.71	20.9.77
48	Mr. Arshad Hussain Sheh	5	Matric	-do-	15.4.72	18.9.91

Senior W/shed Div  
on contract bas

P/118 ✓

**SENIORITY LIST OF FOREST GUARDS IN RESPECT OF KUNHAR WATERSHED DIVISION MANSEHRA AS IT STOOD ON 30/10/2014.**

#	Name	Designation	BPS	Home District	Date of birth	Date of 1st entry into Govt. Service	Qualification	Regulation appointment/promotion to the present post	Method of recruitment/appointment	Remarks
X	1 S. Fida Hussain Shah	F/Guard	7	Mansehra	02/03/1958	12/03/1977	Matric	22/06/2010	7	-do-
X	2 Azizur-Rahman	F/Guard	7	Mansehra	14/10/1958	12/03/1977	Matric	22/06/2010	7	-do-
X	3 Ghulam Samdani	F/Guard	7	Mansehra	12/12/1958	12/03/1977	Matric	22/06/2010	7	-do-
1	4 Muhammad Ashraf	F/Guard	7	Mansehra	30/04/1960	16/03/1977	B.A	22/06/2010	7	-do-
2	5 Shaukat Iqbal	F/Guard	7	Mansehra	02/10/1957	22/08/1977	Middle	22/06/2010	7	-do-
3	6 Sham-Sur-Rahman	F/Guard	7	Mansehra	01/06/1958	22/08/1977	Middle	22/06/2010	7	-do-
4	7 Habibur-Rahman	F/Guard	7	Mansehra	04/07/1959	22/08/1977	Middle	22/06/2010	7	-do-
5	8 X Maqbool-ur-Rahman	F/Guard	7	Mansehra	01/01/1956	22/08/1977	Middle	22/06/2010	7	-do-
6	9 Muhammad Younis	F/Guard	7	Abbottabad	20/03/1959	20/09/1977	Middle	22/06/2010	7	-do-
7	10 Muhammad Pervaiz-I	F/Guard	7	Mansehra	20/05/1959	12/12/1978	Matric	22/06/2010	7	-do-
8	11 Shabir Hussain	F/Guard	7	Mansehra	08/12/1959	09/04/1979	Matric	22/06/2010	7	-do-
9	12 Muhammad Mushtaq	F/Guard	7	Mansehra	20/04/1958	29/07/1979	Matric	22/06/2010	7	-do-
10	13 Sakhawat Shah	F/Guard	7	Mansehra	10/04/1963	11/10/1982	Matric	22/06/2010	7	-do-
11	14 Amjad Hussain	F/Guard	7	Mansehra	17/01/1964	11/10/1982	Matric	22/06/2010	7	-do-
12	15 Ghulam Murtaza	F/Guard	7	Mansehra	15/04/1964	07/09/1985	Middle	22/06/2010	7	-do-
13	16 Muhammad Pervaiz-II	F/Guard	7	Mansehra	01/04/1965	08/09/1985	Matric	22/06/2010	7	-do-
14	17 Muhammad Pervaiz-III	F/Guard	7	Mansehra	09/03/1966	08/09/1985	Matric	22/06/2010	7	-do-
15	18 Ali-Asghar-I	F/Guard	7	Mansehra	04/04/1965	08/09/1985	Matric	22/06/2010	7	-do-
16	19 Aurangzeb	F/Guard	7	Abbottabad	05/01/1959	18/07/1984	Matric	22/06/2010	7	-do-
17	20 Ali-Asghar-II	F/Guard	7	Mansehra	15/05/1966	08/09/1985	Matric	22/06/2010	7	-do-
18	21 Ghulam Mustafa	F/Guard	7	Mansehra	05/01/1964	03/05/1986	Matric	22/06/2010	7	-do-
19	22 Jahanzeb	F/Guard	7	Mansehra	06/08/1963	29/01/1987	Matric	22/06/2010	7	-do-
20	23 Muhammad Akram	F/Guard	7	Abbottabad	26/09/1964	01/02/1986	Matric	22/06/2010	7	-do-
21	24 Sajjad Ahmad	F/Guard	7	Mansehra	01/05/1968	10/08/1986	Matric	22/06/2010	7	-do-
22	25 Tahir Hussain Shah	F/Guard	7	Abbottabad	24/02/1977	31/05/2008	Matric	22/06/2010	7	-do-
23	26 Muhammad Shabir	F/Guard	7	Mansehra	01/01/1969	18/09/1991	Matric	22/06/2010	7	-do-
24	27 Amjad Hussain Shah	F/Guard	7	Abbottabad	14/03/1969	18/10/1993	B.A	22/06/2010	7	-do-
25	28 Muhammad Khalid	F/Guard	7	Mansehra	04/12/1970	25/09/1990	Matric	22/06/2010	7	-do-
26	29 Abdul-Azeem	F/Guard	7	Mansehra	16/06/1972	22/09/1992	Matric	22/06/2010	7	-do-
27	30 Muhammad Ayub	F/Guard	7	Mansehra	09/06/1967	01/10/1986	F.A	22/06/2010	7	-do-
28	31 Dilpazir	F/Guard	7	Mansehra	07/11/1968	02/01/1988	Matric	22/06/2010	7	-do-
29	32 Ihtesham Saleem	F/Guard	7	Mansehra	30/01/1981	15/12/2005	Matric	22/06/2010	7	-do-
30	33 Jehangir	F/Guard	7	Mansehra	20/02/1959	01/03/1987	Matric	22/06/2010	7	-do-
31	34 Mohib Ali	F/Guard	7	Buner	20/02/1991	26/01/2011	Matric	26/01/2011	7	-do-
32	35 Amir Rizwan	F/Guard	7	Abbottabad	12/03/1971	30/07/1990	Matric	22/06/2010	7	-do-
33	36 Liaqat Ali Khan	F/Guard	7	Mansehra	01/01/1965	16/06/1985	BA	22/06/2010	7	-do-
34	37 Syed Hamad Ali Shah	F/Guard	7	Abbottabad	04/08/1986	12/06/2015	FA	12/06/2015	7	-do-
35	38 Syed Khurram Shah	F/Guard	7	Abbottabad	10/05/1993	16/06/2015	F.Sc	16/06/2015	7	-do-

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SENIORITY LIST OF FOREST GUARDS IN RESPECT OF KUNHAR WATERSHED DIVISION MANSEHRA AS IT STOOD ON 11/10/2016.

Name	Designation	BPS	Home District	Date of birth	Date of 1st entry into Govt. Service	Qualification	Regulation appointment/promotion to the present post	Method of recruitment/appointment	Remarks
1. Azizur-Rahman	F/Guard	8	Mansehra	14/10/1958	12/03/1977	Matric	30/6/2015	8	-do-
2. Ghulam Samdani	F/Guard	8	Mansehra	12/12/1958	12/03/1977	Matric	30/6/2015	8	-do-
3. Muhammad Ashraf	F/Guard	8	Mansehra	30/04/1958	16/03/1977	B.A	30/6/2015	8	-do-
4. Shaukat Iqbal	F/Guard	8	Mansehra	02/10/1957	22/08/1977	Middle	30/6/2015	8	-do-
5. Sham-Sur-Rahman	F/Guard	8	Mansehra	01/06/1958	22/08/1977	Middle	30/6/2015	8	-do-
6. Habibur-Rahman	F/Guard	8	Mansehra	04/07/1959	22/08/1977	Matric	30/6/2015	8	-do-
7. Muhammad Younis	F/Guard	8	Abbottabad	20/03/1959	20/09/1977	Middle	30/6/2015	8	-do-
8. Muhammad Pervaiz-I	F/Guard	8	Mansehra	20/05/1959	12/12/1978	Middle	30/6/2015	8	-do-
9. Shabir Hussain	F/Guard	8	Mansehra	08/12/1959	09/04/1979	Matric	30/6/2015	8	-do-
10. Muhammad Mushtaq	F/Guard	8	Mansehra	20/04/1957	29/07/1979	Matric	30/6/2015	8	-do-
11. Sakhawat Hussain Shah	F/Guard	8	Mansehra	10/04/1963	11/10/1982	Matric	30/6/2015	8	-do-
12. Amjad Hussain	F/Guard	8	Mansehra	17/01/1964	11/10/1982	Matric	30/6/2015	8	-do-
13. Ghulam Murtaza	F/Guard	8	Mansehra	15/04/1964	07/09/1985	Matric	30/6/2015	8	-do-
14. Muhammad Pervaiz-II	F/Guard	8	Mansehra	01/04/1965	08/09/1985	Middle	30/6/2015	8	-do-
15. Muhammad Pervaiz-III	F/Guard	8	Mansehra	09/03/1966	08/09/1985	Matric	30/6/2015	8	-do-
16. Ali-Asghar-I	F/Guard	8	Mansehra	04/04/1965	08/09/1985	Matric	30/6/2015	8	-do-
17. Aurangzeb	F/Guard	8	Abbottabad	05/01/1959	18/07/1984	Matric	30/6/2015	8	-do-
18. Ali-Asghar-II	F/Guard	8	Mansehra	15/05/1966	08/09/1985	Matric	30/6/2015	8	-do-
19. Ghulam Mustafa	F/Guard	8	Mansehra	05/01/1964	03/05/1986	Matric	30/6/2015	8	-do-
20. Jahanzeb	F/Guard	8	Mansehra	06/08/1963	29/01/1987	Matric	30/6/2015	8	-do-
21. Sajjad Ahmad	F/Guard	8	Mansehra	01/05/1968	10/08/1986	Matric	30/6/2015	8	-do-
22. Muhammad Shabir	F/Guard	8	Abbottabad	01/01/1969	18/09/1991	Matric	30/6/2015	8	-do-
23. Abdul-Azeem	F/Guard	8	Mansehra	16/06/1972	22/09/1992	Matric	30/6/2015	8	-do-
24. Muhammad Ayub	F/Guard	8	Abbottabad	09/06/1967	01/10/1986	B.A	30/6/2015	8	-do-
25. Syed Tahir Hussain Shah	F/Guard	8	Mansehra	24/02/1977	31/05/2008	Matric	30/6/2015	8	-do-
26. Muhammad Khalid	F/Guard	8	Mansehra	04/12/1970	25/09/1990	F.A	30/6/2015	8	-do-
27. Amjad Hussain Shah	F/Guard	8	Mansehra	14/03/1969	18/10/1993	Matric	30/6/2015	8	-do-
28. Ihtesham Saleem	F/Guard	8	Mansehra	30/01/1981	15/12/2005	Matric	30/6/2015	8	-do-
29. Jehangir	F/Guard	8	Mansehra	20/02/1959	01/03/1987	Matric	30/6/2015	8	-do-
30. Amir Rizwan	F/Guard	8	Abbottabad	12/03/1971	30/07/1990	Matric	30/6/2015	8	-do-
31. Liaqat Ali Khan	F/Guard	8	Mansehra	01/01/1965	16/05/1985	BA	30/6/2015	8	-do-
32. Syed Hamid Ali Shah	F/Guard	8	Abbottabad	04/08/1986	12/06/2015	FA	30/6/2015	8	-do-
33. Syed Khurram Shah	F/Guard	8	Abbottabad	10/05/1993	16/06/2015	F.Sc	30/6/2015	8	-do-
34. Aurangzeb	F/Guard	8	Mansehra	15/04/1972	09/01/1993	Matric	09/01/1993	8	-do-
35. Mr. Ansab Zakir	F/Guard	8	Mansehra	23/03/1992	27/04/2016	BA	Appointed on fixed pay vide office order No.45 dated 24/4/2016		
36. Mr. Muhammad Naeem	F/Guard	8	Mansehra	17/02/1983	01/05/2016	FA	Appointed on fixed pay vide office order No.46 dated 28/4/2016		
37. Hamid Shahi	F/Guard	8	Abbottabad	2/12/1994	1/08/2016	FA	Appointed on fixed pay vide office order No.01 dated 1/8/2016		

CERTIFICATE

Certified that the seniority list of Forest Guards as it stood on 26/05/2016 has been circulated amongst the concerned which is undisputed.

Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra

Mansehra  
11/10/2017

Abbottabad

Kunhar Watershed  
Division Mansehra  
Receipt No. 164  
Date 05-11-2016

Annex-D/20

FINAL SENIORITY LIST OF FOREST GUARDS IN RESPECT OF KUNHAR WATERSHED DIVISION MANSEHRA AS IT STOOD ON 01/06/2018.

Name	Designation	BPS	Home District	Date of birth	Date of 1st entry into Govt. Service	Qualification	Regulation appointment/promotion to the present post	Method of recruitment/appointment	Remarks
Habibur-Rahman	F/Guard	8	Mansehra	04/07/1959	22/08/1977	Matric	30/6/2015 8	-do-	-
Muhammad Younis	F/Guard	8	Abbottabad	20/03/1959	20/09/1977	Middle	30/6/2015 8	-do-	-
Muhammad Pervaiz-I	F/Guard	8	Mansehra	20/05/1959	12/12/1978	Middle	30/6/2015 8	-do-	-
Shabir Hussain	F/Guard	8	Mansehra	08/12/1959	09/04/1979	Matric	30/6/2015 8	-do-	-
Amjad Hussain	F/Guard	8	Mansehra	17/01/1964	11/10/1982	Matric	30/6/2015 8	-do-	-
Aurangzeb	F/Guard	8	Mansehra	05/01/1959	18/07/1984	Matric	30/6/2015 8	-do-	-
Ghulam Murtaza	F/Guard	8	Mansehra	15/04/1964	07/09/1985	Matric	30/6/2015 8	-do-	-
Muhammad Pervaiz-II	F/Guard	8	Mansehra	01/04/1965	08/09/1985	Middle	30/6/2015 8	-do-	-
Ali-Asghar-I	F/Guard	8	Mansehra	04/04/1965	08/09/1985	Matric	30/6/2015 8	-do-	-
Muhammad Pervaiz-III	F/Guard	8	Mansehra	09/03/1966	08/09/1985	Matric	30/6/2015 8	-do-	-
Ali-Asghar-II	F/Guard	8	Mansehra	15/05/1966	08/09/1985	Matric	30/6/2015 8	-do-	-
Ghulam Mustafa	F/Guard	8	Mansehra	05/01/1964	03/05/1986	Matric	30/6/2015 8	-do-	-
Sajjad Ahmad	F/Guard	8	Mansehra	01/05/1968	10/08/1986	Matric	30/6/2015 8	-do-	-
Muhammad Ayub	F/Guard	8	Abbottabad	09/06/1967	01/10/1986	B.A	30/6/2015 8	-do-	-
Mehanzeb	F/Guard	8	Mansehra	06/08/1963	29/01/1987	Matric	30/6/2015 8	-do-	-
Mehangir	F/Guard	8	Mansehra	20/02/1959	01/03/1987	Matric	30/6/2015 8	-do-	-
Muhammad Khalid	F/Guard	8	Mansehra	04/12/1970	25/09/1990	F.A	30/6/2015 8	-do-	-
Muhammad Shabir	F/Guard	8	Abbottabad	01/01/1959	18/09/1991	Matric	30/6/2015 8	-do-	-
Abdul-Azeem	F/Guard	8	Mansehra	16/06/1972	22/09/1992	Matric	30/6/2015 8	-do-	-
Aurangzeb	F/Guard	8	Mansehra	15/04/1972	09/01/1993	Matric	30/6/2015 8	-do-	-
Amjad Hussain Shah	F/Guard	8	Mansehra	14/03/1969	18/10/1993	Matric	30/6/2015 8	-do-	-
Syed Tahir Hussain Shah	F/Guard	8	Mansehra	24/02/1977	31/05/2008	Matric	30/6/2015 8	-do-	-
Mhesham Saleem	F/Guard	8	Mansehra	30/01/1981	01/01/2013	Matric	30/6/2015 8	-do-	-
Syed Hamid Ali Shah	F/Guard	8	Abbottabad	04/08/1986	12/06/2015	FA	30/6/2015 8	-do-	-
Syed-Khurram Shah	F/Guard	8	Abbottabad	10/05/1993	16/06/2015	F.Sc	30/6/2015 8	-do-	-
Pragaat Ali Khan	F/Guard	8	Mansehra	01/01/1965	16/06/1985	BA	30/6/2015 8	-do-	-
Mr. Naqash	F/Guard	8	Abbottabad	07/12/1991	2/11/2017	D-Com	2/11/2017 8	Son quota	-
Mr. Bilal Siddique	F/Guard	8	Mansehra	09/02/1995	8/11/2017	B.Sc	08/11/2017 8	Through NTS	-
Mr. Bilawal Khurshid	F/Guard	8	Mansehra	19/05/1996	10/11/2017	B.Sc	10/11/2017 8	-do-	-
Mr. Ashfaq Ahmad	F/Guard	8	Mansehra	01/03/1991	14/11/2017	B.A	14/11/2017 8	-do-	-
Mr. Yasir Maqbool	F/Guard	8	Mansehra	07/01/1992	14/11/2017	B.Com	14/11/2017 8	-do-	-
Mr. Arsalan Amjad	F/Guard	8	Mansehra	08/05/1994	14/11/2017	B.Com	14/11/2017 8	-do-	-
Mr. Naveed Hussain	F/Guard	8	Mansehra	25/06/1989	15/11/2017	B.A	15/11/2017 8	-do-	-
Mr. Safeer Ahmad	F/Guard	8	Mansehra	05/02/1992	15/11/2017	F.Sc	15/11/2017 8	-do-	-
Mr. Fawad Ahmad	F/Guard	8	Mansehra	05/09/1990	22/11/2017	B.A	22/11/2017 8	-do-	-
Mr. Khurram Shahzad	F/Guard	8	Mansehra	5/03/1995	17/1/2018	B.A	17/1/2018 8	-do-	-
Syed Maqdad Ak Shah	F/Guard	8	Mansehra	12/2/1996	31/1/2018	B.Sc	31/01/2018 8	Son Quota	-

cle  
 r)  
 OF SUB-DIVISIONAL FOREST OFFICER

ement No.7773-77/E, dated 27/04/2019 and  
 19.

d you are once again and finally directed to  
 urnish their observation/omission if any for  
 immediately without waiting for further

Conservator of Forests  
 Watershed Management Circle  
 Abbottabad

CERTIFICATE  
 Certified that the seniority list of Forest Guards as it stood on 01/06/2018 has been circulated amongst the concerned which is undisputed.

Divisional Forest Officer  
 Kunhar Watershed Division  
 Mansehra.

بخدمت جناب چیف کنزرویشنر  
 (4) منیر علی خان مارکس ہاؤس کونہار واٹرسھڈ ڈویژن



PP-1

FINAL SENIORITY LIST OF FOREST GUARDS IN RESPECT OF KUNHAR WATERSHED DIVISION MANSEHRA AS IT STOOD ON 31/12/2019.

#	Name	Designation	BPS	Home District	Date of birth	Date of 1st entry into Govt. Service	Qualification	Regulation appointment/promotion to the present post	Method of recruitment/appointment	Remarks
1	Ghulam Murtaza	F/Guard	8	Mansehra	15/04/1964	07/09/1985	Matric	30/6/2015	8	-do-
2	Muhammad Pervaiz-II	F/Guard	8	Mansehra	01/04/1965	08/09/1985	Matric	30/6/2015	8	-do-
3	Muhammad Pervaiz-III	F/Guard	8	Mansehra	09/03/1966	08/09/1985	Matric	30/6/2015	8	-do-
4	Ali-Asghar-I	F/Guard	8	Mansehra	15/05/1966	08/09/1985	Matric	30/6/2015	8	-do-
5	Ghulam Mustafa	F/Guard	8	Mansehra	05/01/1964	03/05/1986	Matric	30/6/2015	8	-do-
6	Ali-Asghar-II	Forest Guard	8	Abbottabad	04/04/1965	04/07/1984	Matric	30/6/2015	8	-do-
7	Sajjad Ahmad	F/Guard	8	Mansehra	01/05/1968	10/08/1986	F.A	30/6/2015	8	-do-
8	Muhammad Ayub	F/Guard	8	Mansehra	09/06/1967	01/10/1986	B.A	30/6/2015	8	-do-
9	Jehanzeb	F/Guard	8	Mansehra	06/08/1963	29/01/1987	Matric	30/6/2015	8	-do-
10	Muhammad Khalid	F/Guard	8	Mansehra	04/12/1970	25/09/1990	F.A	30/6/2015	8	-do-
11	Muhammad Shabir	F/Guard	8	Mansehra	01/01/1969	18/09/1991	Matric	30/6/2015	8	-do-
12	Abdul-Azeem	F/Guard	8	Mansehra	16/06/1972	22/09/1992	Matric	30/6/2015	8	-do-
13	Aurangzeb	F/Guard	8	Mansehra	15/04/1972	09/01/1993	Matric	30/6/2015	8	-do-
14	Amjad Hussain Shah	F/Guard	8	Mansehra	14/03/1969	18/10/1993	Matric	30/6/2015	8	-do-
15	Syed Tahir Hussain Shah	F/Guard	8	Mansehra	24/02/1977	31/05/2008	Matric	30/6/2015	8	-do-
16	Ihtesham Saleem	F/Guard	8	Mansehra	30/01/1981	29/07/2011	Matric	30/6/2015	8	-do-
17	Syed Hamid Ali Shah	F/Guard	8	Abbottabad	04/08/1986	12/06/2015	FA	30/6/2015	8	-do-
18	Syed Khurram Shah	F/Guard	8	Abbottabad	10/05/1993	16/06/2015	F.Sc	30/6/2015	8	-do-
19	Mr. Naqash	F/Guard	8	Abbottabad	07/12/1991	2/11/2017	D.Com	2/11/2017	8	Son quota
20	Mr. Bilal Siddique	F/Guard	8	Mansehra	09/02/1995	8/11/2017	B.Sc	08/11/2017	8	Through NTS
21	Mr. Bilawal Khurshid	F/Guard	8	Mansehra	19/05/1996	10/11/2017	B.Sc	10/11/2017	8	-do-
22	Mr. Ashfaq Ahmad	F/Guard	8	Mansehra	01/03/1991	14/11/2017	B.A	14/11/2017	8	-do-
23	Mr. Yasir Maqbool	F/Guard	8	Mansehra	07/01/1992	14/11/2017	B.Com	14/11/2017	8	-do-
24	Mr. Arsalan Amjid	F/Guard	8	Mansehra	08/05/1994	14/11/2017	B.Com	14/11/2017	8	-do-
25	Mr. Naveed Hussain	F/Guard	8	Mansehra	25/06/1989	15/11/2017	B.A	15/11/2017	8	-do-
26	Mr. Safeer Ahmad	F/Guard	8	Mansehra	05/02/1992	15/11/2017	F.Sc	15/11/2017	8	-do-
27	Mr. Fawad Ahmad	F/Guard	8	Mansehra	05/09/1990	22/11/2017	B.A	22/11/2017	8	-do-
28	Mr. Khurram Shahzad	F/Guard	8	Mansehra	5/03/1995	17/11/2018	B.A	17/11/2018	8	-do-
29	Syed Maqdad Ali Shah	F/Guard	8	Mansehra	12/2/1996	31/1/2018	B.Sc	31/01/2018	8	Son Quota
30	Muhammad Awais	F/Guard	8	Mansehra	16/04/1991	06/12/2018	D/Com	06/12/2018	8	By DSC
31	Farmaish Ali	F/Guard	8	Mansehra	15/04/1995	06/12/2018	B/Com	06/12/2018	8	-do-
32	Qazi Muhammad Tasleem	F/Guard	8	Mansehra	28/05/1993	07/12/2018	FA	07/12/2018	8	-do-
33	Zeeshan Yousaf	F/Guard	8	Mansehra	06/09/1996	07/12/2018		07/12/2018	8	-do-
34	Kamran	F/Guard	8	Mansehra	11/05/1992	10/12/2018	F/A	10/12/2018	8	-do-
35	Azaim Ali	F/Guard	8	Abbottabad	14/09/1991	08/04/2015	B.A	08/04/2015	8	-do-

Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra

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FINAL SENIORITY LIST OF FOREST GUARDS IN RESPECT OF KUNHAR WATERSHED DIVISION MANSEHRA AS IT STOOD ON 15-03-2022

#	Name	Designation	BPS	Home District	Date of birth	Date of 1st entry into Govt. Service	Qualification	Regulation appointment/Promotion to the present post	Method of recruitment/appointment		Remarks
1	Ali-Asghar-II	F/Guard	8	Abbottabad	04/04/1965	04/07/1984	Matric	30/06/2015	8	DSC	Seniority restored in the light of CCF-II Minute of meeting dated 25-8-2020, and CF Watershe office letter No.1369/E, dated 24-9-2021
2	Muhammad Pervaiz-II	F/Guard	8	Mansehra	01/04/1965	08/09/1985	Middle	30/6/2015	8	-do-	
3	Muhammad Pervaiz-III	F/Guard	8	Mansehra	09/03/1966	08/09/1985	Middle	30/6/2015	8	-do-	
4	Ali-Asghar-I	F/Guard	8	Mansehra	15/05/1966	08/09/1985	Matric	30/6/2015	8	-do-	
5	Ghulam Mustafa	F/Guard	8	Mansehra	05/01/1964	03/05/1986	Matric	30/6/2015	8	-do-	
6	Sajjad Ahmad	F/Guard	8	Mansehra	01/05/1968	10/08/1986	F.A	30/6/2015	8	-do-	
7	Muhammad Ayub	F/Guard	8	Mansehra	09/06/1967	01/10/1986	B.A	30/6/2015	8	-do-	
8	Jehanzeb	F/Guard	8	Mansehra	06/08/1963	29/01/1987	Matric	30/6/2015	8	-do-	
9	Muhammad Khalid	F/Guard	8	Mansehra	04/12/1970	25/09/1990	F.A	30/6/2015	8	-do-	
10	Muhammad Shabir	F/Guard	8	Mansehra	01/01/1969	18/09/1991	Matric	30/6/2015	8	-do-	
11	Abdul-Azeem	F/Guard	8	Mansehra	16/06/1972	22/09/1992	Matric	30/6/2015	8	-do-	
12	Aurangzeb	F/Guard	8	Mansehra	15/04/1972	09/01/1993	Matric	30/6/2015	8	-do-	
13	Syed Tahir Hussain Shah	F/Guard	8	Mansehra	24/02/1977	31/05/2008	Matric	30/6/2015	8	-do-	
14	Ihtesham Saleem	F/Guard	8	Mansehra	30/01/1981	29/07/2011	Matric	30/6/2015	8	-do-	
15	Syed Hamid Ali Shah	F/Guard	8	Abbottabad	04/08/1986	12/06/2015	FA	30/6/2015	8	-do-	
16	Syed Khurram Shah	F/Guard	8	Abbottabad	10-05-1993	16/06/2015	F.Sc	30/6/2015	8	-do-	
17	Mr. Nagash	F/Guard	8	Abbottabad	07/12/1991	2/11/2017	D-Com	2/11/2017	8	Son quota	
18	Mr. Bilal Siddique	F/Guard	8	Mansehra	09/02/1995	8/11/2017	B.Sc	08/11/2017	8	NTS	
19	Mr. Bilawal Khurshid	F/Guard	8	Mansehra	19/05/1996	10/11/2017	B.Sc	10/11/2017	8	-do-	
20	Mr. Ashfaq Ahmad	F/Guard	8	Mansehra	01/03/1991	14/11/2017	B.A	14/11/2017	8	-do-	
21	Mr. Yasir Maqbool	F/Guard	8	Mansehra	07/01/1992	14/11/2017	B.Com	14/11/2017	8	-do-	
22	Mr. Arsalan Amjid	F/Guard	8	Mansehra	08/05/1994	14/11/2017	B.Com	14/11/2017	8	-do-	
23	Mr. Naveed Hussain	F/Guard	8	Mansehra	25/06/1989	15/11/2017	B.A	15/11/2017	8	-do-	
24	Mr. Safeer Ahmad	F/Guard	8	Mansehra	05/02/1992	15/11/2017	F.Sc	15/11/2017	8	-do-	
25	Mr. Fawad Ahmad	F/Guard	8	Mansehra	05/09/1990	22/11/2017	B.A	22/11/2017	8	-do-	
26	Mr. Khurram Shahzad	F/Guard	8	Mansehra	5/03/1995	17/1/2018	B.A	17/1/2018	8	-do-	
27	Syed Magdad Ali Shah	F/Guard	8	Mansehra	12/2/1996	31/1/2018	B.Sc	31/01/2018	8	Si/ Quota	
28	Muhammad Awais	F/Guard	8	Mansehra	16/04/1991	06/12/2018	D/Com	06/12/2018	8	By DSC	
29	Farmaish Ali	F/Guard	8	Mansehra	15/04/1995	06/12/2018	B/Com	06/12/2018	8	-do-	
30	Qazi Muhammad Taseem	F/Guard	8	Mansehra	28/05/1993	07/12/2018	FA	07/12/2018	8	-do-	
31	Zeeshan Yousaf	F/Guard	8	Mansehra	06/09/1996	07/12/2018	FA	07/12/2018	8	-do-	
32	Kamran	F/Guard	8	Mansehra	11/05/1992	10/12/2018	F/A	10/12/2018	8	-do-	
33	Azaim Ali	F/Guard	8	Abbottabad	14/09/1991	08/04/2015	B.A	08/04/2015	8	-do-	
34	Muhammad Adil	F/Guard	8	Mansehra	03-10-1988	17-03-2015	M.A	17-03-2015	8	-do-	
35	Usman Ahmad	F/Guard	8	Mansehra	14-02-1998	18-12-2017	FSc	18-12-2017	8	-do-	
36	Mr. Shahid Mehmood	F/Guard	8	Abbottabad	07.09.1992	19.02.2019	B.A	19.02.2019	8	-do-	
37	Mr. Ameer Hamza Islam	F/Guard	8	Mansehra	08.03.1996	27.10.2021	M.A	27.10.2021	8	-do-	
38	Mr. Wajid	F/Guard	8	Mansehra	05.03.1998	27.10.2021	FSc	27.10.2021	8	-do-	

No. 1318-22/KWM, dated Mansehra the 05<sup>th</sup> 10/31/2022

Submitted to:-

1. The Conservator of Forests Watershed Management Circle Abbottabad for favour of information please.
2. SDFO/RFO in respect of Kunhar Watershed Division Mansehra for information and necessary action. They are directed to circulate the seniority list amongst the F/Guard their respective Sub Division/Ranges.

Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra

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Annex C-123

TENTATIVE SENIORITY LIST OF FOREST GUARDS IN RESPECT OF KUNHAR WATERSHED DIVISION MANSEHRA AS IT STOOD ON 30/06/2021.

#	Name	Designation	BPS	Home District	Date of birth	Date of Ist entry into Govt. Service	Qualification	Regulation appointment/promotion to the present post	Method of recruitment/appointment	Remarks
1	Muhammad Pervaiz-II	F/Guard	8	Mansehra	01/04/1965	08/09/1985	Matric	30/6/2015	8	DSC
2	Muhammad Pervaiz-III	F/Guard	8	Mansehra	09/03/1966	08/09/1985	Matric	30/6/2015	8	-do-
3	Ali-Asghar-I	F/Guard	8	Mansehra	15/05/1966	08/09/1985	Matric	30/6/2015	8	-do-
4	Ghulam Mustafa	F/Guard	8	Mansehra	05/01/1964	03/05/1986	Matric	30/6/2015	8	-do-
5	Jehanzeb	F/Guard	8	Mansehra	06/08/1963	29/01/1987	Matric	30/6/2015	6	-do-
6	Sajjad Ahmad	F/Guard	8	Mansehra	01/05/1968	10/08/1986	F.A	30/6/2015	8	-do-
7	Ali-Asghar-II	F/Guard	8	Abbottabad	04/11/1965	04/07/1984	Matric	01/06/2015	8	-do-
8	Muhammad Ayub	F/Guard	8	Mansehra	09/06/1957	01/10/1986	B.A	30/6/2015	8	-do-
9	Muhammad Khalid	F/Guard	8	Mansehra	04/12/1970	25/09/1990	F.A	30/6/2015	8	-do-
10	Muhammad Shabir	F/Guard	8	Mansehra	01/01/1969	18/09/1991	Matric	30/6/2015	8	-do-
11	Abdul-Azeem	F/Guard	8	Mansehra	16/06/1972	22/09/1992	Matric	30/6/2015	8	-do-
12	Aurangzeb	F/Guard	8	Mansehra	15/04/1972	09/01/1993	Matric	30/6/2015	8	-do-
13	Syed Tahir Hussain Shah	F/Guard	8	Mansehra	24/02/1977	31/05/2008	Matric	30/6/2015	6	-do-
14	Ihtesham Saleem	F/Guard	8	Mansehra	30/01/1981	29/07/2011	Matric	30/6/2015	8	-do-
15	Syed Hamid Ali Shah	F/Guard	8	Abbottabad	04/08/1986	12/06/2015	FA	30/6/2015	8	-do-
16	Syed Khurram Shah	F/Guard	8	Abbottabad	10-05-1993	16/06/2015	F.Sc	30/6/2015	8	-do-
17	Mr. Naqash	F/Guard	8	Abbottabad	07/12/1991	2/11/2017	D-Com	2/11/2017	8	Son quota
18	Mr. Bilal Siddique	F/Guard	8	Mansehra	09/02/1995	8/11/2017	B.Sc	08/11/2017	8	Through NTS
19	Mr. Bilawal Khurshid	F/Guard	8	Mansehra	19/05/1996	10/11/2017	B.Sc	10/11/2017	8	-do-
20	Mr. Ashfaq Ahmad	F/Guard	8	Mansehra	01/03/1991	14/11/2017	B.A	14/11/2017	8	-do-
21	Mr. Yasir Maqbool	F/Guard	8	Mansehra	07/01/1992	14/11/2017	B.Com	14/11/2017	8	-do-
22	Mr. Arsalan Amjid	F/Guard	8	Mansehra	08/05/1994	14/11/2017	B.Com	14/11/2017	8	-do-
23	Mr. Naveed Hussain	F/Guard	8	Mansehra	25/06/1989	15/11/2017	B.A	15/11/2017	8	-do-
24	Mr. Safeer Ahmad	F/Guard	8	Mansehra	05/02/1992	15/11/2017	F.Sc	15/11/2017	8	-do-
25	Mr. Fawad Ahmad	F/Guard	8	Mansehra	05/09/1990	22/11/2017	B.A	22/11/2017	8	-do-
26	Mr. Khurram Shahzad	F/Guard	8	Mansehra	5/03/1995	17/11/2018	B.A	17/11/2018	8	-do-
27	Syed Maqdad Ali Shah	F/Guard	8	Mansehra	12/2/1996	31/1/2018	B.Sc	31/01/2018	8	Son Quota
28	Muhammad Awais	F/Guard	8	Mansehra	16/04/1991	06/12/2018	D/Com	06/12/2018	6	By DSC
29	Farmaish Ali	F/Guard	8	Mansehra	15/04/1995	06/12/2018	B/Com	06/12/2018	8	-do-
30	Qazi Muhammad Tasleem	F/Guard	8	Mansehra	28/05/1993	07/12/2016	FA	07/12/2016	8	-do-
31	Zeeshan Yousaf	F/Guard	8	Mansehra	06/09/1996	07/12/2018		07/12/2016	8	-do-
32	Kamran	F/Guard	8	Mansehra	11/05/1992	10/12/2018	F/A	10/12/2018	8	-do-
33	Azaim Ali	F/Guard	8	Abbottabad	14/09/1991	08/04/2015	B.A	08/04/2015	8	-do-
34	Muhammad Adil	F/Guard	8	Mansehra	03-10-1988	17-03-2015	M.A	17-03-2015	8	-do-
35	Muhammad Asim	F/Guard	8	Mansehra	01-01-1993	06-05-2015	B.A	06-05-2015	8	-do-
36	Usman Ahmad	F/Guard	8	Mansehra	14-02-1998	18-12-2017	FSc	18-12-2017	8	-do-

Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra

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FINAL SENIORITY LIST OF FOREST GUARDS IN RESPECT OF KUNHAR WATERSHED DIVISION MANSEHRA AS IT STOOD ON 18/10/2021.

#	Name	Designation	BP S	Home District	Date of birth	Date of 1st entry into Govt. Service	Qualification	Regulation appointment/promotion to the present post	Method of recruitment/appointment	Remarks	
1	Ali-Asghar-II	F/Guard	8	Abbottabad	04/04/1965	04/07/1984	Matric	30/06/2015	8	DSC	Seniority restored in the light of CCF-II Minutes of meeting dated 25-8-2020, and CF Watershed office letter No.1369/E, dated 24-9-2021
2	Muhammad Pervaiz-II	F/Guard	8	Mansehra	01/04/1965	08/09/1985	Matric	30/6/2015	8	-do-	
3	Muhammad Pervaiz-III	F/Guard	8	Mansehra	09/03/1966	08/09/1985	Matric	30/6/2015	8	-do-	
4	Ali-Asghar-I	F/Guard	8	Mansehra	15/05/1966	08/09/1985	Matric	30/3/2015	8	-do-	
5	Ghulam Mustafa	F/Guard	8	Mansehra	05/01/1964	03/05/1986	Matric	30/6/2015	8	-do-	
6	Sajjad Ahmad	F/Guard	8	Mansehra	01/05/1968	10/08/1986	F.A	30/6/2015	8	-do-	
7	Muhammad Ayub	F/Guard	8	Mansehra	09/06/1967	01/10/1986	B.A	30/6/2015	8	-do-	
8	Jehanzeb	F/Guard	8	Mansehra	06/08/1963	29/09/1987	Matric	30/6/2015	8	-do-	
9	Muhammad Khalid	F/Guard	8	Mansehra	04/12/1970	25/09/1990	F.A	30/6/2015	8	-do-	
10	Muhammad Shabir	F/Guard	8	Mansehra	01/01/1969	18/09/1991	Matric	30/6/2015	8	-do-	
11	Abdul-Azeem	F/Guard	8	Mansehra	16/06/1972	22/09/1992	Matric	30/6/2015	8	-do-	
12	Aurangzeb	F/Guard	8	Mansehra	15/04/1972	09/01/1993	Matric	30/6/2015	8	-do-	
13	Syed Tahir Hussain Shah	F/Guard	8	Mansehra	24/02/1977	31/05/2008	Matric	30/6/2015	8	-do-	
14	Ihtesham Saleem	F/Guard	8	Mansehra	30/01/1981	29/07/2011	Matric	30/6/2015	8	-do-	
15	Syed Hamid Ali Shah	F/Guard	8	Abbottabad	04/08/1986	12/06/2015	FA	30/6/2015	8	-do-	
16	Syed Khurram Shah	F/Guard	8	Abbottabad	10-05-1993	16/06/2015	F.Sc	30/6/2015	8	-do-	
17	Mr. Naqash	F/Guard	8	Abbottabad	07/12/1991	2/11/2017	D-Com	2/11/2017	8	Son quota	
18	Mr. Bilal Siddique	F/Guard	8	Mansehra	09/02/1995	8/11/2017	B.Sc	08/11/2017	8	Through NTS	
19	Mr. Bilawal Khurshid	F/Guard	8	Mansehra	19/05/1996	10/11/2017	B.Sc	10/11/2017	8	-do-	
20	Mr. Ashfaq Ahmad	F/Guard	8	Mansehra	01/03/1991	14/11/2017	B.A	14/11/2017	8	-do-	
21	Mr. Yasir Maqbool	F/Guard	8	Mansehra	07/01/1992	14/11/2017	B.Com	14/11/2017	8	-do-	
22	Mr. Arsalan Amjid	F/Guard	8	Mansehra	08/05/1994	14/11/2017	B.Com	14/11/2017	8	-do-	
23	Mr. Naveed Hussain	F/Guard	8	Mansehra	25/06/1989	15/11/2017	B.A	15/11/2017	8	-do-	
24	Mr. Safeer Ahmad	F/Guard	8	Mansehra	05/02/1992	15/11/2017	F.Sc	15/11/2017	8	-do-	
25	Mr. Fawad Ahmad	F/Guard	8	Mansehra	05/09/1990	22/11/2017	B.A	22/11/2017	8	-do-	
26	Mr. Khurram Shahzad	F/Guard	8	Mansehra	5/03/1995	17/1/2018	B.A	17/1/2018	8	-do-	
27	Syed Maqdad Ali Shah	F/Guard	8	Mansehra	12/2/1996	31/1/2018	B.Sc	31/01/2018	8	-do-	
28	Muhammad Awais	F/Guard	8	Mansehra	16/04/1991	06/12/2018	D/Com	06/12/2018	8	Son Quota	
29	Farmaish Ali	F/Guard	8	Mansehra	15/04/1995	06/12/2018	B/Com	06/12/2018	8	By DSC	
30	Qazi Muhammad Tasleem	F/Guard	8	Mansehra	28/05/1993	07/12/2018	FA	07/12/2018	8	-do-	
31	Zeeshan Yousaf	F/Guard	8	Mansehra	06/09/1996	07/12/2018	FA	07/12/2018	8	-do-	
32	Kamran	F/Guard	8	Mansehra	11/05/1992	10/12/2018	F/A	10/12/2018	8	-do-	
33	Azaim Ali	F/Guard	8	Abbottabad	14/09/1991	08/04/2015	B.A	08/04/2015	8	-do-	
34	Muhammad Adil	F/Guard	8	Mansehra	03-10-1988	17-03-2015	M.A	17-03-2015	8	-do-	
35	Muhammad Asim	F/Guard	8	Mansehra	01-01-1993	06-05-2015	B.A	06-05-2015	8	-do-	
36	Usman Ahmad	F/Guard	8	Mansehra	14-02-1998	18-12-2017	FSc	18-2-2017	8	-do-	

Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra

## بخدمت جناب کنزرویٹر صاحب واٹرشید منجمنٹ سرکل ایبٹ آباد

بواسطت جناب DFO صاحب کنہار واٹرشید ڈویژن مانسہرہ

عنوان: اپیل برائے درنگی سناری ٹی لسٹ اپروموشن

موجبات اپیل ذیل پیش ہیں۔

(۱) فدوی کونسیارٹی لسٹ بذریعہ DFO صاحب کنہار واٹرشید ڈویژن چھٹی نمبر 58-455 بحریہ 18-10-2021 کو دفتر ہذا سے

یہ چھٹی ایٹھ ہوئی۔ جس کو دیکھنے کے بعد فدوی حیران رہ گیا کہ فدوی کا نام جو آج سے پہلے چھٹی سناری ٹی لسٹ جاری شدہ ہوئی ہیں

ان میں چوتھے نمبر پر تھا۔ لیکن اس سناری ٹی لسٹ میں مجھ سے جو نیئر فارسٹ گارڈ جو 30-06-2021 والی سناری ٹی لسٹ میں

ساتویں نمبر تھا اس کو فدوی سے سنیز کر کے پہلے نمبر پر ڈال دیا گیا جو کہ فدوی کے ساتھ زیادتی ہے۔

(۲) علی اصغر فارسٹ گارڈ کو پہلا نمبر ڈال کر کے ریمارکس میں ہے کہ چیف کنزرویٹر کے منٹس آف میٹنگ 25-08-2020 کا

حوالہ دیا گیا۔

(۳) جناب چیف کنزرویٹر صاحب منٹس آف میٹنگ مورخہ 25-08-2020 کا حوالہ دیا گیا جب کہ سناری ٹی لسٹ مورخہ

30-06-2021 کو منٹس آف میٹنگ کے دس ماہ بعد جاری ہوئی ہے جو کہ درست تھی اب اس میٹنگ کا حوالہ دے کر چار ماہ

بعد سناری ٹی لسٹ نئی بنانا یہ سوالیہ نشان ہے۔

(۴) جناب چیف کنزرویٹر صاحب نے میٹنگ مورخہ 22-08-2020 کو کی ہے اور اس میں جو حکم صادر فرمایا گیا ہے اس وقت

ڈرافٹ رولز بنے تھے اب جب کہ فارسٹ گارڈ کے باقاعدہ نوٹیفائی رولز مورخہ 04-06-2021 کو جاری ہو چکے ہیں جس

میں فارسٹ گارڈ کی پروموشن اور بھرتی صرف ڈویژن لیول پر ہوگی تو اس میٹنگ کی کوئی حیثیت نہیں رہ جاتی اور اس رولز کے بعد

30-06-2021 کو سناری ٹی لسٹ جاری شدہ ہے جس کے مطابق فدوی چوتھے نمبر پر ہے جو درست اور قانون کے مطابق ہے

کاپی رولز اور سناری ٹی لسٹ لف درخواست ہذا ہے۔

(۵) Appointment Promotion and Transfer Rules 1989 Section 8 (2) کے

مطابق دوسرے ڈویژن سے آنے والے ملازم سناری ٹی کے آخر پر رہے گا اور اس کی تاریخ سناری ٹی میں Date of Arrival

سے تصور کی جائے گی۔ (کاپی لف درخواست ہذا ہے)

(۶) اس طرح کے کیس میں سپریم کورٹ آف پاکستان مورخہ 31-01-2014 کو بھی فیصلہ کر چکی ہے کہ باہر سے آنے والا ملازم

کونسیارٹی میں آخر پر رکھا جائے گا۔ (کاپی لف درخواست ہذا ہے)

(۷) اس طرح کے کیس میں سروس ٹریبونل پشاور اپیل نمبر 8/5702012 اور شوکت خان اور صابر خان

اور دیگر کیسوں میں فیصلہ دے چکا ہے جس کی کاپی لف ہے۔

(۸) فدوی کی سمجھ سے بالاتر ہے کہ تمام قانون DFO کنہار ڈویژن کے پاس ہونے کے باوجود فدوی کی سناریائی لسٹ تبدیل کرنا فدوی کو کس جرم کی سزا دی گئی ہے۔

(۹) اس سے پہلے کی سناریائی لسٹ جاری ہوئی ہے اس میں علی اصغر فارست گارڈ جو نیئر تھا اور ڈویژن لیول کے مطابق لیاقت خان اور امجد حسین اور مرتضیٰ کو ترقی دی گئی ہے اگر ایسی بات ہے تو پھر یہ تمام پروموشن غیر قانونی ہیں یا کہ فدوی کے ساتھ ذاتی عناد ہے۔ یا علی اصغر فارست گارڈ کو خصوصی طور پر نوازا جا رہا ہے ان تمام قانون و حقائق کے مطابق فدوی کی سناریائی لسٹ جو 30-06-2021 کو جاری شدہ ہے وہ درست ہے اور حقیقت پر مبنی ہے اس کو بحال رکھا جائے۔ جو غیر قانونی سناریائی لسٹ مورخہ 18-10-2021 کو جاری کی گئی ہے اس کو غیر قانونی تصور کیا جائے اور فدوی کو قانونی حق دیا جائے۔ کنہار ڈویژن میں چار آسامیاں فارست کی ہیں جس پر پروموشن ہوگی اور چوتھے نمبر پر مجھے بھی پروموشن دیا جائے۔ تمام جملہ حقائق کے مطابق جاری کردہ سناریائی لسٹ مورخہ 30-06-2021 کو بحال کرتے ہوئے فدوی کو سناریائی میں حق دیا جائے اور جاری کردہ سناریائی لسٹ مورخہ 18-10-2021 کو کالعدم قرار دیا جائے اور فدوی کو بحیثیت سنیر فارست گارڈ فارسٹ کی چوتھے نمبر پر خالی آسامی پر ترقی دی جائے۔

جناب کی عین نوازش ہوگی

اوض

غلام مصطفیٰ فارست گارڈ کنہار ڈویژن ہانسہ کوٹ ڈائریکٹریٹ

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Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_

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Weight \_\_\_\_\_ Kilo. \_\_\_\_\_ Grams \_\_\_\_\_

29/12/21

29/12/21

## بخدمت جناب DFO صاحب کنہار واٹرشید ڈویژن مانسہرہ

بواسطت جناب ریج آفیسر صاحب واٹرشید ریج بکوٹ

عنوان: اپیل برائے درستگی سنیا رٹیشن اپروموشن

موجبات اپیل ذیل پیش ہیں۔

(۱) فدوی کونسیارٹی لسٹ بذریعہ DFO صاحب کنہار واٹرشید ڈویژن چھٹی نمبر 58-455 بحریہ 18-10-2021 کو دفتر ہذا سے یہ

چھٹی ایٹھ ہوئی۔ جس کو دیکھنے کے بعد فدوی حیران رہ گیا کہ فدوی کا نام جو آج سے پہلے جتنی سنیا رٹیشن لسٹ جاری شدہ ہوئی ہیں ان میں تیسرے نمبر پر تھا۔ لیکن اس سنیا رٹیشن لسٹ میں مجھ سے جو نیئر فارسٹ گارڈ جو 30-06-2021 والی سنیا رٹیشن لسٹ میں ساتویں نمبر تھا اس کو فدوی سے سنیر کر کے پہلے نمبر پر ڈال دیا گیا جو کہ فدوی کے ساتھ زیادتی ہے۔

(۲) علی اصغر فارسٹ گارڈ جو نیئر کو پہلا نمبر ڈال کر کے ریمرکس میں ہے کہ چیف کنزرویٹور کے منٹس آف میٹنگ 25-08-2020 کا حوالہ دیا گیا۔

(۳) جناب چیف کنزرویٹور صاحب منٹس آف میٹنگ مورخہ 25-08-2020 کا حوالہ دیا گیا جب کہ سنیا رٹیشن لسٹ مورخہ

30-06-2021 کو منٹس آف میٹنگ کے دس ماہ بعد جاری ہوئی ہے جو کہ درست تھی اب اس میٹنگ کا حوالہ دے کر چار ماہ بعد سنیا رٹیشن لسٹ نئی بنانا یہ سوالیہ نشان ہے۔

(۴) جناب چیف کنزرویٹور صاحب نے میٹنگ مورخہ 22-08-2020 کو کی ہے اور اس میں جو حکم صادر فرمایا گیا ہے اس وقت

ڈرافٹ رولز بننے تھے اب جب کہ فارسٹ گارڈ کے باقاعدہ نوٹیفائی رولز مورخہ 04-06-2021 کو جاری ہو چکے ہیں جس میں فارسٹ گارڈ کی پروموشن اور بھرتی صرف ڈویژن لیول پر ہوگی تو اس میٹنگ کی کوئی حیثیت نہیں رہ جاتی اور اس رولز کے بعد 30-06-2021 کو سنیا رٹیشن لسٹ جاری شدہ ہے جس کے مطابق فدوی تیسرے نمبر پر ہے جو درست اور قانون کے مطابق ہے۔ کاپی رولز اور سنیا رٹیشن لسٹ لف درخواست ہذا ہے۔

(۵) Appointment Promotion and Transfer Rules 1989 Sectiono 8 (2) کے

مطابق دوسرے ڈویژن سے آنے والے ملازم سنیا رٹیشن کے آخر پر رہے گا اور اس کی تاریخ سنیا رٹیشن میں Date of Arrival سے تصور کی جائے گی۔ (کاپی لف درخواست ہذا ہے)

(۶) اس طرح کے کیس میں سپریم کورٹ آف پاکستان مورخہ 31-01-2014 کو بھی فیصلہ کر چکی ہے کہ باہر سے آنے والا ملازم

کونسیارٹی میں آخر پر رکھا جائے گا۔ (کاپی لف درخواست ہذا ہے)

(۷) اس طرح کے کیس میں سروس ٹریبونل پشاور اپیل نمبر 8/5702012 اور 1451/2013 شوکت خان اور صابر خان

فارسٹ گارڈ کی اپیل خارج کر چکی ہے اور سنیا رٹیشن ڈویژن لیول کے حق میں فیصلہ دے چکی ہے جس کی کاپی لف ہے۔

ہی کی سمجھ سے بالاتر ہے کہ تمام قانون DFO کنہار ڈویژن کے پاس ہونے کے باوجود فدوی کی سناری ٹی لسٹ تبدیل کرنا مدوی کو کس جرم کی سزا دی گئی ہے۔

اس سے پہلے کی سناری ٹی لسٹ جاری ہوئی ہے اس میں علی اصغر فارسٹ گارڈ جو نیئر تھا اور ڈویژن لیول کے مطابق لیاقت خان اور امجد حسین اور مرتضیٰ کو ترقی دی گئی ہے اگر ایسی بات ہے تو پھر یہ تمام پروموشن غیر قانونی ہیں یا کہ فدوی کے ساتھ ذاتی عناد ہے۔

یا علی اصغر فارسٹ گارڈ جو نیئر کو خصوصی طور پر نوازا جا رہا ہے ان تمام قانون و حقائق کے مطابق فدوی کی سناری ٹی لسٹ جو 30-06-2021 کو جاری شدہ ہے وہ درست ہے اور حقیقت پر مبنی ہے اس کو بحال رکھا جائے۔ جو غیر قانونی سناری ٹی لسٹ مورخہ 18-10-2021 کو جاری کی گئی ہے اس کو غیر قانونی تصور کیا جائے اور فدوی کو قانونی حق دیا جائے۔ کنہار ڈویژن میں چار آسامیاں فارسٹ کی ہیں جس پر پروموشن ہوگی اور تیسرے نمبر پر مجھے بھی پروموشن کیا جائے۔

تمام جملہ حقائق کے مطابق جاری کردہ سناری ٹی لسٹ مورخہ 30-06-2021 کو بحال کرتے ہوئے فدوی کو سناری ٹی میں حق دیا جائے اور جاری کردہ سناری ٹی لسٹ مورخہ 18-10-2021 کو کالعدم قرار دیا جائے اور فدوی کو بحیثیت سنیر فارسٹ گارڈ فارسٹ کی تیسرے نمبر پر خالی آسامی پر ترقی دی جائے۔

جناب عالی رستم خان FG نمبر 1 بھائی عزیز الرحمن FG رشید FG مشرف FG اشرف FG پرویز FG بالا کوٹ وائر شیڈ ریجن سے پروموشن ہوئے ہیں چند سال پہلے اس کے علاوہ گڑھی حبیب اللہ وائر شیڈ ریجن سے شبیر FG اور حبیب الرحمن FG اور مانسہرہ وائر شیڈ ریجن سے سردار محمد یونس اور حال میں بکوٹ وائر شیڈ ریجن سے لیاقت خان FG اور امجد FG اور گڑھی حبیب اللہ سے مرتضیٰ FG یہ سب لوگ سابقہ سناری ٹی لسٹ پر 30-06-2021 کو جاری کی گئی ہے یہ درست ہے 18-10-2021 کو جاری کی گئی ہے اس کو غیر قانونی تصور کیا جائے جس میں علی اصغر فارسٹ گارڈ سکیڈ کو ایک نمبر پر لایا گیا ہے۔ سابقہ کنہار ڈویژن سے جو 12 FG لوگ پروموشن ہوئے ہیں 30-06-2021 والی سناری ٹی لسٹ پیچھے سے آرہی ہے اس پر پروموشن ہوئے ہیں یہ درست ہے۔

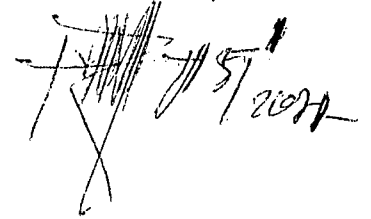
لہذا اپر ذرا پیل کرتے ہیں 30-06-2021 والی سناری ٹی لسٹ کو بحال کیا جائے اس میں راجہ غلام مصطفیٰ FG چوتھے نمبر پر ہے اور کنہار ڈویژن میں جو چار آسامیاں فارسٹ کی خالی ہیں ان میں سے چوتھے نمبر والا راجہ غلام مصطفیٰ پروموشن ہو سکتا ہے 18-10-2021 کو جاری کی گئی ہے اس کو غیر قانونی تصور کیا جائے اور فدوی کو قانونی حق دیا جائے۔

جناب عالی اگر ہمیں یہاں سے انصاف نہ ملا تو ہم قانونی چورہ جوئی کے لیے عدالت سے رجوع کریں گے انصاف ملنے کے لیے اس کے علاوہ جتنی میٹنگوں میں منٹس جاری کیے گئے ہیں یا سپریم کورٹ کا فیصلہ یا سروس ٹریبونل کوٹ کا فیصلہ کاپی ساتھ لف ہیں۔

جناب کی عین نوازش ہوگی

**الارض**

راجہ غلام مصطفیٰ فارسٹ گارڈ کنہار وائر شیڈ ڈویژن مانسہرہ بکوٹ وائر شیڈ ریجن





CONSERVATOR OF FORESTS  
WATERSHED MANAGEMENT CIRCLE  
ABBOTTABAD



4/24  
Ammer (F)

No. 4414 /E-Appeal Dated Abbottabad the 03/06/2022<sup>3</sup>

Muhammad Pervaiz Forest Guard -I  
and other Forest Guards  
C/O DFO Kunhar Watershed Division  
Mansehra

Subject: APPEAL ON TENTATIVE SENIORITY LIST OF FOREST GUARD OF  
KUNHAR WATERSHED DIVISION AS IT STOOD ON 18/10/2020.

As explain in detail by this office vide No- 2670/ E76-116 dated 13/12/2021 as well as in the light of comments furnished by the DFO Kunhar Watershed Mansehra vide his litter No- 994/KWM dated 03/2/2022 on the subject appeal the undersigned come to conclusion that the DFO Kunhar Watershed has correctly been prepared seniority list of the Forest Gourds of his Division and issued on 18/10/2021.

Therefore, the undersigned being appellatant authority has politely been rejected your appeal dated Nil received in this office on 12/11/2021.

*Cdmy*  
Conservator of Forest  
Watershed Management Circle  
Abbottabad

No. /E-Appeal

Copy forwarded to the:-

- 1- Chief Conservator of Forests Northern Forest Region-II Abbottabad
- 2- Divisional Forest Officer Kunhar Watershed Division Mansehra

For information:

Conservator of Forest  
Watershed Management Circle  
Abbottabad

جی پی سی ہذا سب سے ریج آفیسر کو  
وصول ہوا ہے۔  
12-3-2022

P/30  
Ammed

**Minutes of the Meeting chaired by Mr. Azhar Ali Khan, Chief Conservator of Forests (CCF) Northern Forest Region-II (NFR-II) held in the Office of CCF NFR-II on 25.08.2020**

In the wake of:

1. Changed service rules as approved by Committee (SSRC) and circulated vide the office No. G-150-52/1 dated 06/01/2020 whereby direct entries of forester is stopped - affording smooth chances of promotion to Forest Guards.
2. Decision of the Administrative Department communicated vide No. SO(E-III)/1-111/2019/3031-38 dated 02/08/2019 whereby transfer of forest guards from parent division to any other forest division is prohibited.
3. Anomalies noticed in seniority lists of forest guards in various forest division occurred due to transfer of forest guard from parent division to other forest division.

A meeting was convened in the office of Chief Conservator of Forests Northern Forest Region-II Abbottabad on 25.08.2020, wherein following officers / officials participated;

1. Mr. Sagheer Ahmed Malik, CF Watershed
2. Mr. Ejaz Qadir, CF Lower Hazara
3. Mr. Yalmur Ilyas, DFO Gallies
4. Mr. Sheryar Dilawar, DFO Patrol Squad Lower Hazara
5. Mr. Abdul Hameed, Superintendent Lower Hazara Circle
6. Mr. Khalid Khan, Head Clerk Gallies Forest Division
7. Muhammad Riaz, Assistant Regional Office
8. Mr. Javed Iqbal, Senior Clerk Patrol Squad Lower Hazara

It was agreed that without recourse to anomalies identified in observance of FR (14) and subsequent clarification contained in E&AD letter No. SOR(S&GAD)1-62/80 dated 15/07/2005 the transfer of Forest Guard from parent division to any other division in contravention of 1962 Rules whereby Forest Guard is declared as divisional cadre, not only disturbs the existing seniority list but also become hurdle in their promotion even after completion of long services.

Therefore, it was decided to level the field for affording opportunities of smooth promotion leaving minimum chances of litigation.

After threadbare discussion following decision were made;

- i. Henceforth no Forest Guard shall be transferred from parent division to any other division however;
  - a. In case of transfer of Forest Guard from parent division to any other division on his own request, he for the purpose of seniority, will be



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considered as if appointed on date of his arrival in that division. An affidavit in this regard shall be obtained from him followed by necessary entries in his Service Book.

- b. In case of forceful transfer due any administrative consideration, the transferred one shall remain at the payroll of parent division.
- ii. Those Forest Guards who, due to seniority issues, have been repatriated back to parent division, shall immediately be included in the seniority list of parent division.
- iii. All Forest Guards who have completed three years tenure continuously in division other than parent division, shall immediately be included in the seniority list whereas other ones with less than three years tenure shall be repatriated to parent division and incorporated into seniority list as per service reckoned from date of appointment.

The meeting ended with the vote of thanks from and to the chair.

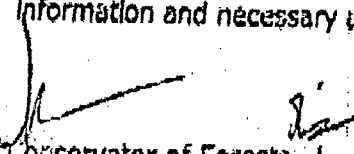
Sd/- (Azhar Ali Khan)  
Chief Conservator of Forests  
Northern Forest Region-II  
Khyber Pakhtunkhwa  
Abbottabad

No. 206P-90 /

Dated Abbottabad the 16/9 /2020

Copy for circulation forwarded to the:

1. Chief Conservator of Forests, Central Southern Forest Region-I Peshawar for information.
2. Chief Conservator of Forests, Malakand Forest Region-III Swat for information.
3. All Conservator of Forests Northern Forest Region-II Abbottabad for information and necessary action.
4. Section Officer Establishment Government of Khyber Pakhtunkhwa Forestry, Environment & Wildlife Department Peshawar for information.
5. PS to the Secretary to Government of Khyber Pakhtunkhwa Forestry, Environment & Wildlife Department Peshawar for information.
6. All Divisional Forest Officers Northern Forest Region-II Abbottabad for information and necessary action.

  
Chief Conservator of Forests  
Northern Forest Region-II  
Khyber Pakhtunkhwa  
Abbottabad

P/32  
Amma '4'

Minutes of the Meeting chaired by Mr. Azhar Ali Khan, Chief Conservator of Forests (CCF) Northern Forest Region-II (NFR-II) held in the Conference Room of Regional Office Abbottabad on 05.10.2020

A meeting with all Conservators and DFOs in NFR-II was convened by the CCF on the following Agenda items (List of participants attached);

1. Improvement of Satisfaction level of Complaints at Pakistan Citizen Portal.
2. Progress made under PC-I "Ten Billion Tree Tsunami Programme Phase-I, Up scaling of Green Pakistan Programme".
3. Prosecution Cases.
4. Forest Conservancy.
5. Any Other Issue.

The discussion and decisions on agenda items are summarized as below;

**1. PAKISTAN CITIZEN PORTAL**

After welcome remarks by chair, the meeting started with briefing by CF Lower Hazara (Focal Person) of accounts of meeting held under the Chairmanship of worthy Secretary Forestry Environment and Wildlife Department (FE&WD) wherein the dissatisfaction was showed over poor satisfaction level of NFR-II, which was 38% i.e. below the benchmark of 50%. In said meeting such level of satisfaction was generally attributed to indifference and inefficiency of forest staff.

In response the CF Upper Hazara commented that it is not always inefficiency of staff in satisfying the complainer who sometimes irrespective of facts and law, want disposal of complaints in accord with their ambitions. He also referred some complaints which were quite illogical such as a complaint was lodged against staff of Torghar Forest Division, who did not register FIR against local MPA for the charges of making a controversial speech in a Jirga. He proposed thorough study of the Manual of Pakistan Citizen Portal for handling these types of complaints.

The decisions taken after deliberations are given below:

- i. No laxity shall be tolerated in disposal of complaints placed at Pakistan Citizen Portal desk board.
- ii. All possible measures shall be taken to resolve the issues highlighted in the complaints.
- iii. Where applicable Urdu language shall be for facilitating the citizens.
- iv. All DFOs shall personally look into Dashboard and improve the performance and satisfaction percentage before 20.10.2020.
- v. Each DFO shall personally go through the instructions of Manual of Pakistan Citizen Portal and be ready to take a test in this regard on next meeting.

*Attested*  
*(Signature)*  
Divisional Conservator of Forests  
Northern Forest Region-II  
Abbottabad

*Auth. Sec*  
*To note the decision*  
*to be made in meeting*

vi. Performance in disposal of complaints shall be one of the basic tool to assess ones performance reflected in annual PERs.

2. **PROGRESS MADE UNDER PC-I "TEN BILLION TREE TSUNAMI PROGRAMME PHASE-I, UP SCALING OF GREEN PAKISTAN PROGRAMME"**

Less achievement of targets during the Monsoon 2020 was attributed to intensive raining for a short spell followed by rainless period. However, the house assured completion of all the targets of current fiscal year by utilizing maximum planting time of spring 2021. The following instructions were issued;

- i. Proper planning for achieving targets shall be made in hand before 15<sup>th</sup> November 2020.
- ii. Community organization and conclusion of agreements for various activities shall be completed during November – December 2020.
- iii. By better planning the time for storage of extracted bare rooted plants in nurseries shall be minimized to avoid wilting and ultimate failure in plantations.
- iv. For undertaking immediate corrective measures, the CFs and DFOs shall personally conduct surprise visits of nurseries for ensuring proper extraction, storage and loading of planting stock.
- v. Since sufficient funds are available therefore there is no justification of delayed payments to labours. The CFs must monitor this aspect for resolving issues there and then.
- vi. The CFs must check the tour dairies of the DFOs and asses their performance by field verifications.

3. **PROSECUTION CASES**

Huge numbers of pending Prosecution Cases reflects inefficiency on the part of DFOs. Therefore all possible measures should be taken for pleading the cause of state in the court of law and getting the cases decided.

**FOREST PROTECTION**

Forest protection against illicit cutting is core duty of the Forest Department, in this pursuit;

The DFOs must ensure presence of their staff at place of their duty.

The CFs should ensure that the DFOs are properly observing office time and conducting field tours.

Although government has been requested to help checking timber smuggling through Hazara Motor/Expressway by adopting suitable mechanism in collaboration with NHA but till such decision all possible measures should be undertaken for forestalling and apprehending forest produce smuggling through this route. The chair appreciated initiative of DFO Hazara Tribal who has shifted the barrier to intervene in forest produce transportations through expressway.

*Attested*  
*(W)*  
*Amir Javed*

- v. All possible measures shall be taken to curb down the menace of timber smuggling. Special arrangements should be made to check any timber smuggling at each entry point of the Expressway.
- vii. All the stumps should be carved with proper number on most durable point. Without any cogent reason, any stump without number shall be presumed as outcome of illegal cutting for the purpose of proceeding against the responsible one.
- vi. The Compartment History Files must invariable be maintained and updated.

5. GENERAL ISSUES

The Chair directed that Minutes of Meeting regarding Seniority List of Forest Guards was issued vide this office No.2069-90/E dated 16/09/2020 wherein some decisions were taken for streamlining the seniority lists of the Forest Guards disturbed due to inter divisional transfers resulting simmering dissatisfactions and triggering litigations. However, as evident from the appeals of Forest guards received in this office, it seems that the decisions have not properly been construed. Therefore the chair clarified that:

- i. ~~The Forest Guards adjusted in any division due to termination of a project or were surplus in Watershed Management Project, shall as per different courts' decisions, for the purpose of seniority shall be considered as if appointed on the date of adjustment in the respective Forest Division.~~ ✓
- ii. ~~However the Forest Guards transferred from any other permanent forest division and working in any other division continuously for three years or more, shall be given seniority from the date of appointment.~~ ✓
- iii. ~~The Forest Guards who have passed less than three years but do not want to be transferred back to their parent divisions, shall produce an affidavit that they should be placed at the bottom of the seniority list existing on the date of their arrival in the Division. Entries shall be made in their respective service books accordingly.~~ ✓

The meeting ended with vote of thanks from chair.

*Ahmed Ali Khan*  
*Chairman*

Sd/-(Azhar Ali Khan)  
 Chief Conservator of Forests  
 Northern Forest Region-II  
 Khyber Pakhtunkhwa  
 Abbottabad

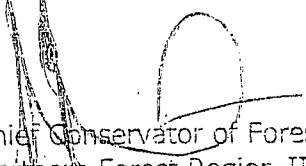
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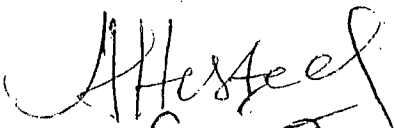
No. 3146-70 /

Dated Abbottabad the 20/10/2020

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1. Chief Conservator of Forests, Central Southern Forest Region-I Peshawar for information.
2. Chief Conservator of Forests, Malakand Forest Region-III Swat for information.
3. All Conservator of Forests Northern Forest Region-II Abbottabad for information and necessary action.
4. Project Director 10 BTAP Peshawar for information and necessary action.
5. All Divisional Forest Officers Northern Forest Region-II Abbottabad for information and necessary action.
6. PS to Secretary Forestry, Environment & Wildlife Department government of Khyber Pakhtunkhwa Peshawar for information.

  
Chief Conservator of Forests  
Northern Forest Region-II  
Khyber Pakhtunkhwa  
Abbottabad

  
A. Hesseef  
In Charge  
Kandahar

Amma 4/30

FINAL SENIORITY LIST OF FOREST GUARDS IN RESPECT OF KUNHAR WATERSHED DIVISION MANSEHRA AS IT STOOD ON 15-03-2022

#	Name	Designation	BPS	Home District	Date of birth	Date of 1st entry into Service	Govt.	Qualification	Regulation / appointment / Promotion to the present post	Method of recruitment / appointment	Remarks	
1	Ali-Asghar-II	F/Guard	8	Abbottabad	04/04/1965	04/07/1984		Matric	30/06/2015	8	DSC	Seniority restored in the light of CCF-II Minute of meeting dated 25-8-2020, and CF Watershe office letter No.1369/E, dated 24-9-2021
2	Muhammad Pervaiz-II	F/Guard	8	Mansehra	01/04/1965	08/09/1985		Middle	30/6/2015	8	-do-	
3	Muhammad Pervaiz-III	F/Guard	8	Mansehra	09/03/1966	08/09/1985		Middle	30/6/2015	8	-do-	
4	Ali-Asghar-I	F/Guard	8	Mansehra	15/05/1966	08/09/1985		Matric	30/6/2015	8	-do-	
5	Ghuflam Mustafa	F/Guard	8	Mansehra	05/01/1964	03/05/1986		Matric	30/6/2015	8	-do-	
6	Sajjad Ahmad	F/Guard	8	Mansehra	01/05/1968	10/08/1986		F.A	30/6/2015	8	-do-	
7	Muhammad Ayub	F/Guard	8	Mansehra	09/06/1967	01/10/1986		B.A	30/6/2015	8	-do-	
8	Jehanzeb	F/Guard	8	Mansehra	06/08/1963	29/01/1987		Matric	30/6/2015	8	-do-	
9	Muhammad Khalid	F/Guard	8	Mansehra	04/12/1970	25/09/1990		F.A	30/6/2015	8	-do-	
10	Muhammad Shabir	F/Guard	8	Mansehra	01/01/1969	18/09/1991		Matric	30/6/2015	8	-do-	
11	Abdul-Azeem	F/Guard	8	Mansehra	16/06/1972	22/09/1992		Matric	30/6/2015	8	-do-	
12	Aurangzeb	F/Guard	8	Mansehra	15/04/1972	09/01/1993		Matric	30/6/2015	8	-do-	
13	Syed Tahir Hussain Shah	F/Guard	8	Mansehra	24/02/1977	31/05/2008		Matric	30/6/2015	8	-do-	
14	Iftesham Saleem	F/Guard	8	Mansehra	30/01/1981	29/07/2011		Matric	30/6/2015	8	-do-	
15	Syed Hamid Ali Shah	F/Guard	8	Abbottabad	04/08/1986	12/06/2015		FA	30/6/2015	8	-do-	
16	Syed Khuram Shah	F/Guard	8	Abbottabad	10-05-1993	16/06/2015		F.Sc	30/6/2015	8	-do-	
17	Mr. Naqash	F/Guard	8	Abbottabad	07/12/1991	2/11/2017		D-Com	2/11/2017	8	Son quota	
18	Mr. Bilal Siddique	F/Guard	8	Mansehra	09/02/1995	8/11/2017		B.Sc	08/11/2017	8	NTS	
19	Mr. Bilawal Khurshid	F/Guard	8	Mansehra	19/05/1996	10/11/2017		B.Sc	10/11/2017	8	-do-	
20	Mr. Ashfaq Ahmad	F/Guard	8	Mansehra	01/03/1991	14/11/2017		B.A	14/11/2017	8	-do-	
21	Mr. Yasir Maqbool	F/Guard	8	Mansehra	07/01/1992	14/11/2017		B.Com	14/11/2017	8	-do-	
22	Mr. Arsalan Amjid	F/Guard	8	Mansehra	08/05/1994	14/11/2017		B.Com	14/11/2017	8	-do-	
23	Mr. Naveed Hussain	F/Guard	8	Mansehra	25/06/1989	15/11/2017		B.A	15/11/2017	8	-do-	
24	Mr. Safeer Ahmad	F/Guard	8	Mansehra	05/02/1992	15/11/2017		F.Sc	15/11/2017	8	-do-	
25	Mr. Fawad Ahmad	F/Guard	8	Mansehra	05/09/1990	22/11/2017		B.A	22/11/2017	9	-do-	
26	Mr. Khuram Shahzad	F/Guard	8	Mansehra	5/03/1995	17/11/2018		B.A	17/11/2018	8	-do-	
27	Syed Maqdad Ali Shah	F/Guard	8	Mansehra	12/2/1996	31/1/2018		B.Sc	31/01/2018	8	By Quota	
28	Muhammad Awais	F/Guard	8	Mansehra	16/04/1991	06/12/2018		D/Com	06/12/2018	8	By DSC	
29	Farmaish Ali	F/Guard	8	Mansehra	15/04/1995	06/12/2018		B/Com	06/12/2018	8	-do-	
30	Qazi Muhammad Taseem	F/Guard	8	Mansehra	28/05/1993	07/12/2018		FA	07/12/2018	8	-do-	
31	Zeeshan Yousaf	F/Guard	8	Mansehra	06/09/1996	07/12/2018		FA	07/12/2018	8	-do-	
32	Kamran	F/Guard	8	Mansehra	11/05/1992	10/12/2018		F/A	10/12/2018	8	-do-	
33	Azaim Ali	F/Guard	8	Abbottabad	14/09/1991	08/04/2015		B.A	08/04/2015	8	-do-	
34	Muhammad Adil	F/Guard	8	Mansehra	03-10-1988	17-03-2015		M.A	17-03-2015	8	-do-	
35	Usman Ahmad	F/Guard	8	Mansehra	14-02-1996	18-12-2017		F.Sc	18-12-2017	8	-do-	
36	Mr. Shahid Mehmood	F/Guard	8	Abbottabad	07.09.1992	19.02.2019		B.A	19.02.2019	8	-do-	
37	Mr. Ameer Hamza Islam	F/Guard	8	Mansehra	08.03.1996	27.10.2021		M.A	27.10.2021	8	-do-	
38	Mr. Wajid	F/Guard	8	Mansehra	05.03.1998	27.10.2021		F.Sc	27.10.2021	8	-do-	

No. 1318-22 /KWM, dated Mansehra the 05 /03/2022

- Submitted to:-
- The Conservator of Forests Watershed Management Circle Abbottabad for favour of information please.
  - SDFO/RFO in respect of Kunhar Watershed Division Mansehra for information and necessary action. They are directed to circulate the seniority list amongst the F/Guard in their respective Sub Division/Ranges.

Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra

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Annex - J

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 527/2016

Shakir Ullah,  
Forest Guard (BPS-08),  
Kalam Forest Division, Swat.

Appellant

**VERSUS**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 561  
Dated 02-6-2016

- 1 Government of Khyber Pakhtunkhwa through Secretary Forest, Peshawar
- 2 Conservator of Forest, Malakand Circle East, Saidu Sharif, Swat
- 3 D.F O, Kalam Forest Division, Swat.
- (4) Gulab Khan, Forest Guard, Kalam Forest Division, Swat.
- (5) Saeed Ur Rehman, Forest Guard, Kalam Forest Division, Swat
6. Muhammad Nawaz, Forest Guard, Kalam Forest Division, Swat
- 7 Shaukat Ali, Forest Guard, Kalam Forest Division, Swat
- (8) Fazal Muhammad, Forest Guard, Kalam Forest Division, Swat
- 9 Muhammad Rauf, Forest Guard, Kalam Forest Division, Swat
- 10 Taza Gul, Forest Guard, Kalam Forest Division, Swat
- 11 Habib Ur Rehman, Forest Guard, Kalam Forest Division, Swat
- 12 Atta Ur Rehman, Forest Guard, Kalam Forest Division, Swat
- (13) Muhammad Khurshid, Forest Guard, Kalam Forest Division, Swat.
- 14 Amjad Ali, Forest Guard, Kalam Forest Division, Swat.
- (15) Muhammad Zada, Forest Guard, Kalam Forest Division, Swat
- 16 Manawar ul Islam, Forest Guard, Kalam Forest Division, Swat
- (17) Fayaz Ahmad, Forest Guard, Kalam Forest Division, Swat
- (18) Sherin Zada, Forest Guard, Kalam Forest Division, Swat.
19. Mehboob Khan, Forest Guard, Kalam Forest Division, Swat.

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*Handwritten initials:* N/S

Respondents

**Filed to-day**

**Registrar**

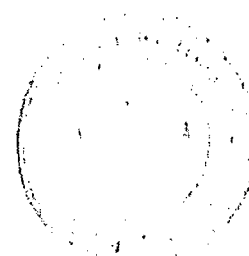
**REGISTERED**  
15/11/2016  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 587/2016

Date of Institution ... 02.06.2016

Date of Decision ... 06.07.2021



Shakir Ullah, Forest Guard (BPS-08), Kalam Forest Division, Swat.  
... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Forest, Peshawar  
and others. ... (Respondents)

Present.

M/S Ansarul Khan, Advocate & S. Numan Ali Bukhari, Advocates ... For appellants.

Mr. Muhammad Adeel Butt, Addl. Advocate General ... For respondents.

MR AHMAD SULTAN TAREEN	...	CHAIRMAN
MR. SALAH-UD-DIN,	...	MEMBER(J)
MRS. ROZINA REHMAN	...	MEMBER(J)
MR. ATIQ-UR-REHMAN WAZIR,	...	MEMBER(E)

JUDGMENT

**AHMAD SULTAN TAREEN, CHAIRMAN:-** The appeal prescribed above in the heading was referred to be heard by Larger Bench vide order dated 01.10.2018 passed by the Division Bench of this Tribunal. It was observed with reference to the point of learned counsel for the respondents that Appeal No. 1454/2013 was dismissed by this

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Tribunal vide judgment dated 03.01.2017 as annexed with the comments in which similar question was involved. Against the said point, learned counsel for the appellant also produced the copy of judgment of this Tribunal dated 17.04.2013 passed in Service Appeal No. 456/2013 titled "Mian Karim Shah Vs. Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar and others" whereby, on similar ground, the appeal was allowed. It was noted in the said order sheet dated 01.10.2018 that different judgments of this Tribunal are in field. It was suggested on behalf of both the parties to constitute a Larger Bench to decide the issue once for all. The Division Bench agreed with the suggestion. The said appeal thereafter remained under proceedings before the Larger Bench. In the meantime, Appeal No. 1418/2014 titled "Ghulam Qadir Vs. The Secretary, Government of Khyber Pakhtunkhwa, Forest & Wildlife Department, Peshawar and others" when came up for hearing before the Division Bench on 14.03.2019, the same was also referred for hearing by the Larger Bench and was clubbed for hearing with the aforementioned Appeal already in course of proceedings for hearing by the Larger Bench. Therefore, this judgment shall dispose of both the aforementioned appeals.

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2. According to actual account given in Appeal No. 587/2016 the appellant was selected/appointed as Forest Guard on 14.04.1988 in Swat Watershed Project and later on he was adjusted against a sanctioned post in Forest Division Swat vide order dated 09.05.2001.

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Thereafter, he was transferred to Kalam Forest Division on 26.04.2004. He claimed seniority i.e.f. the date of his initial regular appointment which was granted to him vide order dated 27.05.2010 on acceptance of his departmental appeal. The order granting seniority to the appellant was challenged by the other Forest Guards of Kalam Forest Division, through representation. On acceptance of the representation by the Chief Conservator of Forests vide order dated 28.06.2013, DFO Kalam Division was directed to streamline the seniority in light of guideline set in the order of Conservator. The appellant again challenged the said decision and his plea was accepted by the Secretary to Government of Khyber Pakhtunkhwa, Environment Department vide order dated 13.11.2013. It was directed by the said authority for preparation of fresh seniority list of all Forest Guards. The Service Appeal No. 1317/2013 of the appellant was also disposed of by the Tribunal vide order dated 06.01.2014 in view of the order of the Secretary dated 13.11.2013. Thereafter, the name of the appellant was listed in the seniority list at S. No. 3 as it stood on 30.06.2011 and in seniority list as it stood on 31.12.2013, the name of the appellant was placed at S. No. 2 of the list. The appellant was expecting his position at Serial No. 1 in the seniority list after promotion of one Mr. Abdur Rahman to the higher scale but in the impugned seniority list dated 31.01.2016, his name was placed at Serial No. 17 of the seniority list of Forest Guards of Kalam Forest

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 Khyber Pakhtunkhwa  
 Service Tribunal  
 Peshawar

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Division. After exhausting remedy of departmental appeal, he approached this Tribunal through present service appeal.

3. The respondents No. 1 to 3 submitted their parawise comments. They admitted the stance of appellant to the extent of disposal of his appeal by the Secretary Environment vide order dated 13.11.2013. However, it was added that Appointment, Promotion and Transfer Rules, 1989 was silent in order to bring the appellant on top. However, as per decision announced by the Service Tribunal Khyber Pakhtunkhwa dated 06.01.2014, the decision made earlier by the Secretary to Government of Khyber Pakhtunkhwa Environment Department was merely endorsed. Seniority list of Forest Guards of Kalam Forest Division as stood on 01.11.2016 was again issued. In the meantime, other Forest Guard namely Saeedur Rehman of Kalam Forest Division also filed appeal in this Tribunal against various decisions made earlier i.e on 13.11.2013 and 16.01.2014 by Secretary Forest Department and Service Tribunal respectively which were set aside and the grievance of the appellant Mr. Saeedur Rehman Forest Guard were redressed by acceptance of his appeal. As a result of which the seniority of the appellant was suffered and brought to S.No.18 of the seniority list. The respondents in nutshell of their submission discussed before made a point in their reply to the grounds of appeal that the appellant was placed at S.No. 2 of Seniority List of Forest Guards, but as a result of acceptances of appeals of Forest

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Secretary  
Khyber Pakhtunkhwa  
Service Tribunal

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Guard of Kalam Forest Division, the appellant was again brought to S.No. 17 of seniority list of the Forest Guards. The respondents also asserted that the seniority lists of Forest Guards have been issued according to prevailing Rules i.e. Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 which states that a person so transferred should be placed at the bottom of the cadre strength which he joins for the purpose of determining his seniority viz-a-viz other members born on the cadre.

4. The appellant in Appeal No. 1418/2014 made a case in factual accounts that he originally belongs to Dir-Kohistan Forest Division whereas the private respondents were transferred from other circles to the circle of appellant on different dates which are known to the Department. Among other facts, he averred about his qualification and fitness for promotion. However, the main point in the said appeal for our consideration is the question of determination of seniority of the appellant viz-a-viz the private respondents who were transferred from other circles to the circle of appellant on different dates. The respondents No. 1 to 4 came up with the reply/comments that the appellant was initially appointed as Forest Guard under the developmental project titled "Special Development Project/ADP" vide order dated 15.11.1989 and his services were regularized vide order dated 18.10.1993 w.e.f 01.07.1993 passed by the Divisional Forest Officer, Dir Forest Division, Timergara. Thus, he is junior from

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The respondents have submitted the copy of the Memo dated 20.01.1993 in plain text format of Chief Secretary, Peshawar, Appointment, Transfer and Promotion Order, 1993 of Forest Department notified vide the S.O. I IIY(ad)/1-45/58/Vol IV dated 20.01.1993 as determined at the level of a Forest Division and not Forest Circle.

- 5. We have heard the arguments and perused the record.
- 6. We have on record before us three judgments of this Tribunal as available in file of Appeal No. 587/2016 which include the judgment dated 12.03.2012 passed in Service Appeal No. 776/Heem/2006, judgment dated 17.04.2013 passed in Service Appeal No. 456/2012 and the judgment dated 03.01.2017 passed in Service Appeal No. 1454/2013. According to the facts noted in the judgment dated 17.04.2013 in Service Appeal No. 456/2012 titled "Mian Karim Shah Vs. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar and others", the appellant was selected and appointed as Forest Guard on 02.04.1988 in Watershed Management Project at Swat. He was later on adjusted against the sanctioned post by Finance Department in Forest Division Swat vide order dated 09.05.2001. Vide order dated 31.05.2008, his seniority was considered from the date of appointment in Swat Forest Division. The Department issued seniority list of Forest Guards as it stood on 31.12.2010 in which he was placed at Serial No. 32. Later on he was transferred from Swat Forest

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Secretary, Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

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Division to Demarcation Forest Division Swat. He filed an appeal dated 29.08.2011 to respondent No. 3 for his seniority because his posting in Demarcation Forest Division was made without his consent. He was placed at S.No. 1 of the seniority list of Forest Guards of Demarcation Forest Division Swat as it stood on 25.10.2011. However, vide impugned order dated 15.11.2011, the seniority list dated 25.10.2011 was withdrawn. Feeling aggrieved, the appellant (Karim Shah) filed departmental appeal on 13.12.2011 and then service appeal under discussion herein above.

7. After noting the arguments of the parties in the judgment dated 17.04.2013 the following findings were given by the Tribunal:-

7. The Tribunal while agreeing with the arguments advanced by the learned counsel for the appellant observes that the appellant was posted as Forest Guard in Swat Forest Division. He was performing his services smoothly. Meanwhile one Abdul Jalil, Forest Guard, submitted application for transfer from Demarcation Forest Division to Swat Forest Division. Respondent No. 4 issued No Objection Certificate for the transfer and effect the same. The said Abdul Jalil was placed in Swat Forest Division while the appellant was got transferred to Demarcation Forest Division in place of Abdul Jalil. Record shows that the appellant had not expressed any desire for the transfer nor was he otherwise taken into confidence.

*Karim Shah*

APPROVED  
*[Signature]*  
Member Tribunal  
Punjab

8. The appellant then approached the respondent No. 3 for giving him seniority with effect from his date of appointment. Agreeing to the request, respondent No. 3 directed respondent No. 4 accordingly. In compliance with the direction respondent No. 4 issued seniority list placing the appellant at the top. But a sudden somersault occurred and, newly issued seniority list was withdrawn and the old one was restored. There by the appellant was found from the top to the bottom of the list."

8. In view of the above findings, the appeal was accepted and the respondent No. 4 i.e. Divisional Forest Officer, Demarcation Forest Division Saidu Sharif Swat was directed to consider the seniority of the appellant from the date of appointment and to review the impugned promotion order accordingly. The relief in the operative part as discussed before was actually meant to remand the matter to the respondent No. 4 as neither seniority list nor the promotion order was set aside as prayed by the appellant.

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9. In the judgment dated 03.01.2017 passed in Service Appeal No. 1454/2013 titled "Said Amir Shah Versus the Chief Conservator of Forests Peshawar and another", the facts as noted were that the appellant was appointed as Forester in Buner Watershed Division vide order dated 23.02.1985. That on the option of the appellant he was transferred from the said project to Malakand Forest Circle. That

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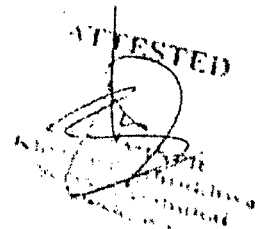
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similarly placed employees were placed senior to the appellant by counting their seniority w.e.f. the date of initial appointment while appellant was deprived of the same constraining him to prefer departmental appeal followed by the instant appeal. The findings as given in Para-7 of the above mentioned judgment are noted below:-

**"The appellant was initially appointed as Forester in Buner Water Shed Division to Malakand Forest Circle. Both the departments are of different cadre and as such a civil servant exercising option for appointment on transfer is to be enlisted in the seniority list w.e.f. his date of such order. The appellant has been granted the said status as he has been enlisted in the seniority list w.e.f. 23.04.2010 i.e the date on which he was inducted in Malakand Forest Circle. Treatment meted out to other civil servants such as Izat Sher etc. may not be in consonance with the settled principle of transfer and appointment of a civil servant from one cadre to another cadre and as such an act of the respondents cannot be endorsed and adopted as a rule for granting seniority to appellant."**



10. As far as findings in the judgment passed in Service Appeal No. 456/2012 and 1454/2013 are concerned, they are simply based on

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factual account without reference to any provision of law. Needless to say that the seniority of a government servant is part of terms and condition of his service which by virtue of Section 3 of the Khyber Pakhtunkhwa Civil Servants Act is to be governed by the Act and the rules made there-under. Section 26 of the Act *ibid* relates to the rules making authority. Sub-section (2) of Section 26 provides that any rules, orders or instructions in respect of any terms and conditions of service of civil servants duly made or issued by an authority competent to make them and in force immediately before the commencement of this Act shall, in so far as such rules, orders or instructions are not inconsonant with the provisions of this Act, be deemed to be rules made under the Act *ibid*.

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11. In the judgment dated 12.03.2012 passed in Service Appeal No. 776/NEEM/2006, a question was framed whether transfer of respondent No. 5 from Patrol Squad Division Swat to Swat Forest Division was a permanent transfer or transfer on deputation or else a routine transfer by the competent authority in the same department. The said question was dealt with vide findings under para-6 of the judgment as copied below:-

**"As regards the first issue, suffice it to say that the Forest Department Forest Guard (Divisional) Service Rules, 1962, provide for constitution of service on divisional basis, that is a separate service to be forced for each forest division; that**

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*[Signature]*  
Secretary, Government of Khyber Pakhtunkhwa  
Swat

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Divisional Forest Officers concerned designated as the appointing authority. Like-wise, the notification dated 26.01.1993 prescribes the method of recruitment/ promotion to the rank of Forester as (a) 50% by initial recruitment; and (b) 50% by promotion, on the basis of seniority-cum-fitness, from amongst holders of posts of Forest Guards of the Forest Division where the vacancies occur. Admittedly, Patrol Squad Division, Mingora, Swat and Swat Forest Division are two separate divisions, though under the same Conservator of Forests, Malakand Circle at Mingora, Swat. The record would further show that the department has been treating both the Patrol Squad Forest Division and Swat Forest Division as separate divisions and, as such, maintaining separate seniority lists of Forest Guards in both the divisions. It has been proved on record that respondent No. 5 got selection grade in BPS-7 on the basis of 33% out of the total strength of 98 Forest Guards of Swat Forest Division vide order dated 07.03.1994. There are documents on record showing grant of promotion and selection grade on the basis of seniority in the respective divisions; and in the case of Mr. Biland Iqbal, Forest Guard, who was granted selection grade in the Patrol Squad Division, Mingora, on his transfer from Patrol Squad Division, Mr. Muhammad Maaz, Forest Guard was allowed selection grade in BS-7, vide order dated 23.06.1994, wherein it was clearly laid down that the selection grade will be

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AFFIRMED  
*[Signature]*  
KUSTOOR PAKISTAN  
Service Tribunal  
Peshawar

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confined to service in Patrol Squad Division only. On the other hand, the West Pakistan Forest Department Delegation of Powers Rules, 1962 would show Conservator of Forests as the transferring authority for Forest Guards within the circle. Therefore, respondent No. 5 along with three others was transferred from Patrol Squad Forest Division to Swat Forest Division by the Conservator of Forests, Malakand Circle Mingora vide order dated 21.06.1983. There is, however, nothing in the said transfer order to indicate that the transfer is either permanent or on deputation. In the like manner, there have been a number of transfers of Forest Guards in the circle by the Conservator of Forests from one division to another, and even re-transfer to the original division in a routine manner, without any difficulty or objection raised by any quarter; but re-transfer of respondent No. 5 to the Patrol Squad, Division at a particular juncture when vacancy for promotion to the rank of Forester was available and the appellant, being on the top of the seniority list of Forest Guards of Patrol Squad Division, was denied promotion, gave rise to dispute, which necessitated decision of the department on the representation/appeal of the appellant for determination of the question of seniority after transfer and re-transfer of Forest Guards from one division to another. The department, having failed to address this issue at the appropriate time, provided space for litigation between two

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contenders for promotion. The department can, under no circumstances, absolve itself of the responsibility to settle this issue once for all, in the light of departmental appeal of the appellant, which is being sent to the appellate authority i.e. respondent No. 3 for determination of status of transfers and re-transfers made by him, in the light of relevant law/rules, alongwith determination of question of seniority, amongst the incumbents in such a situation."

12. In the above findings as given in the judgment dated 12.03.2012, reference of Forest Department Forest Guards (Divisional) Service Rules, 1962 and of West Pakistan Forest Department Delegation of Powers Rules, 1962 had been given. The case was remanded to the Appellate Authority for appropriate decision on respective position of the appellant and private respondents in light of the discussion/ observations given in the judgment. The course was kept open for the aggrieved party to avail the remedy as available under the law.

Sumera

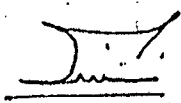
13. As far as the judgment of this Tribunal in Service Appeal No. 456/2012 and 1454/2013 discussed above are concerned, they in presence of the judgment dated 12.03.2012 passed in Service Appeal No. 776/NEEM/2006 have got no binding effect, mainly for the reason that the findings in the said two judgments are simply based on the facts of each case without reference to the rules applicable to the fact

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JUDGE  
Service Tribunal  
Islamabad

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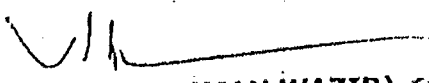
in issue. On the other hand, the judgment dated 12.03.2012 is based on findings in relation to the facts in issue with reference to the law on the subject as discussed therein. Besides the rules discussed in judgment dated 12.03.2012, we also find that the West Pakistan Forest Manual Volume-II relates to Establishment, Accounts and Budget. There are rules in the said Manual called "The Khyber Pakhtunkhwa Subordinate Service Rules, 1943" which provides about the seniority of the members of the service besides other terms and conditions. Following the ratio in the judgment dated 12.03.2012 discussed above, we deemed it appropriate to remand the issue of seniority involved in the present appeals to the respective Divisional Forest Officers for settlement of the issue in-between the appellants and the private respondents having regard to the law and rules on the subject including the law pointed out here in this judgment and other relevant laws. The appeals stand disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record room.

**ANNOUNCED**  
06.07.2021

  
(SALAH-UD-DIN)  
Member(J)

  
(AHMAD SULTAN TAREEN)  
Chairman

  
(ROZINA REHMAN)  
Member(J)

  
(ATIQ-UR-REHMAN WAZIR)  
Member(E)

Certified true copy  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

*Regd*

SB

Appeal No. 622 of 20 22

Ghulam Mustafa Appellant/Petitioner

*Versus*  
DFO Kunhar watershed Division Mansehra Respondent

Respondent No. (1)

Notice to: —

DFO Kunhar Watershed Division Mansehra

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....08/07/2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....09.....

Day of.....May.....20 22

For Reply

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

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Chlorine water

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DFO Kupper watered Division M. G. ...

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DFO Kupper watered Division M. G. ...

08/07/2005

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**“B”**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

No. Resd SB  
 Appeal No. 622 of 2022  
Ghulam Mustafa Appellant/Petitioner  
 Versus  
DFO Kunhar Watershed Division Mansehra Respondent  
 Respondent No. (2)

Notice to: Conservator of Forest, Watershed Management  
Circle Abbottabad

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Day of May 2022.

For Reply

[Signature]  
 Registrar,

**Khyber Pakhtunkhwa Service Tribunal,**  
**Peshawar.**

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Ref  
1/29/80

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(System Monitor)

DFD Number Waterbed Vision Monitor

(33)

Director of Forest, Watershed Management  
(Site Application)

08/07/80

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**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

No.

*Recd*

*SB*

Appeal No. *622* of 20 *22*

*Ghulam Mustafa* Appellant/Petitioner

Versus

*DFO Kunhar Watershed Division Mamshera* Respondent

Respondent No. *(3)*

Notice to:

*Chief Conservator of Forest Northern Forest  
Region-II, KPK Abbottabad*

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Day of *May* 20 *22*

*For Reply*

*[Signature]*  
Registrar

**Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.**

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DFO Karpur Watershed Division Mamselva

(3)

Region-II, VVK Appalabadi  
(Chief Conservator of Forest Northern Forest)

08/07/2022

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For Regy

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

SB

Resd

Appeal No.....622..... of 20 22

.....Glulam Mustafa.....Appellant/Petitioner

Versus

DFO Kunhar Watershed Division Mansehra Respondent

Respondent No.....(52).....

Notice to: —

Mi Asghar-II, Forest Guard, Kunhar Watershed  
Division Mansehra

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....08/07/2022.....at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Day of.....May.....20 22

For Reply



Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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Dr. ...

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**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR. *SB*

No.

*622*

Appeal No. *Ghulam Mustafa* of *22* 20

Appellant/Petitioner

*DFO Kunhar Watershed vs. Division Mansehra*

Respondent

Respondent No.

Notice to: —

*Secy to Govt of KPK Forest Deptt: Civil Secretariat Peshawar*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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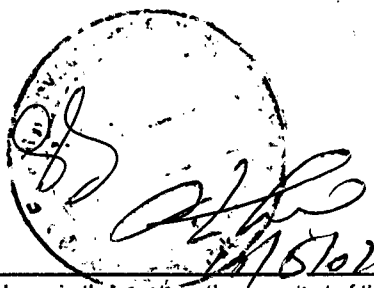
Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

*09*

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....*May* 22 20

*For Reply*



*Jm*

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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~~Def Kambur Watched Division Murokha~~

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Ref to Govt of Kyr Forest Dept: Civil Secretariat  
Kambur

08/07/2005

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For 1/1/07

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

Service Appeal No.622/2022

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 63

Dated 01-6-2022

Ghulam Mustafa Versus DFO etc

Put up to the court with  
relevant appeal.

**APPLICATION SEEKING SUSPENSION OF PROMOTION ORDER OF PRIVATE  
RESPONDENT Mr. ASGHAR ALI AS FORESTER.**

Respectfully Sheweth,

1/06/2022

The applicant seeks to submit:-

1. That the above titled appeal is subjudice before this Hon'ble Tribunal and fixed for reply/comments of respondents on 08-07-2022.
2. That long standing seniority of the appelland was disturbed by the official respondents to bring the private respondent above the appelland in the seniority list quite erroneously.
3. That seniority of private respondent is disputed and is subjudice in the above titled appeal of the appelland.
4. That despite the seniority of private respondent being disputed and subjudice, official respondent No. 1 has issued the promotion order of said private respondent vide office order No. 21 dated 23.05.2022. copy of said order is annexed.
5. That the appelland has got a good case and there is every likelihood of success of his appeal. If the order of promotion to the extent of private respondent is not suspended, the appelland will suffer with loss.

It is requested that order of promotion may graciously be suspended as solicited.

Dated 01.06.2022.

APPLICANT

Through:-

Counsel



(Inayat Ullah Khan Tareen Advocate)



OFFICE ORDER NO. 21 DATED MANSEHRA THE 23/05/2022, ISSUED BY MR. ABID MUMTAZ  
DIVISIONAL FOREST OFFICER, KUNHAR WATERSHED DIVISION MANSEHRA.

On the recommendation of Departmental Promotion Committee constituted vide Divisional Forest Officer, Kunhar Watershed Division Mansehra office order No. 17 dated 25.04.2022, held on 23.05.2022 under the Chairmanship of Mr. Abid Mumtaz, Divisional Forest Officer, Kunhar Watershed Division Mansehra (Chairman Departmental Promotion Committee) following Senior Most Forest Guard holder of 1st, 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> positions on Final Seniorly List of Forest Guards of Kunhar Watershed Division Mansehra are hereby promoted to the rank of Forester BPS-10 with immediate effect on regular basis:-

1. Mr. Ali Asghar-I
2. Mr. Muhammad Pervaiz-I
3. Mr. Muhammad Pervaiz-II
4. Mr. Ali Asghar-II

This order is purely temporary and will not confer any right for continuity on abolishing of the posts and the official will be liable to reversion to original post without any notice.

The Foresters will be on probation for a period of one year, may be extendable for an other one year in case if the probation period if not terminated in terms of Section 6(2) of the NWFP Civil Servant Act, 1973 and with Rule 15(l) of the NWFP Civil Servant (Appointment, Promotion and Transfer Rules, 1989).

The Foresters are allowed to continue the duties at their present places of posting till further order.

Sd/- (Abid Mumtaz)  
Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra

Copy forwarded to the:-

1. The Chief Conservator of Forests, Northern Forest Region-II, Abbottabad for favour of information. This is with reference to his good office minutes of meeting dated 25.08.2020 please.
2. The Conservator of Forests, Watershed Management Circle, Abbottabad. For favour of information. This is with reference to his office letter No.1369/GE dated 24.09.2021 please.
3. Divisional Accountant for information.
4. M/S. Ali Asghar, Muhammad Pervaiz-I, Muhammad Pervaiz-II and Ali Asghar-II Foresters for information.

Divisional Forest Officer  
Kunhar Watershed Division  
Mansehra