

28.09.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Vide order dated 04.07.2022, directions were issued to the appellant to implead all those employees as respondents, against whom he is claiming seniority, therefore, in consequence of the said order, the appellant submitted the names of Mr. Jalal-ud-Din S/O Fateh Muhammad, Mubashir Dilawar S/O Dilawar Khan, Amjad Khan S/O Ameer Khan, Hanif Ullah S/O Jhangir Khan and Haq Nawaz S/O Abdul Majeed for impleadment as respondents in the instant appeal. They are thus impleaded as respondents in the instant appeal. Office is directed to make necessary entry in this respect in memo of appeal as well as register accordingly. Notice be issued to the newly impleaded respondents for submission of reply/comments through registered post. Adjourned. To come up for submission of reply/comments on 26.10.2022 before the S.B at Camp Court D.I.Khan.




(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

26.10.2022

Appellant in person present.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Reply not submitted. Learned AAG requested for time to submit reply/comments. Opportunity is granted. To come up for reply/comments on 24.11.2022 before S.B at Camp Court, D.I.Khan.



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

Appeal No. 1087/2022

04th July, 2022

Counsel for the appellant present and submits that against the tentative seniority list, the appellant filed objection as directed vide letter No. DP/EA/1(66)3664-3709 dated 10.03.2022 wherein it was also directed that in case the objections could not have been filed within 10 days, the tentative seniority list would be considered as final seniority list. Learned counsel submits that it is in this view of the matter the departmental appeal was filed by the appellant on 24.03.2022 and awaiting ninety days statutory period, when no reply was received from the respondents, he filed this appeal, which is within time. The appeal is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee and security within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 27.07.2022 before S.B at camp court D.I.Khan. The appellant is directed to implead all the respondents from whose he is claiming seniority within 7 days, where-after they and all other out district respondents be summoned through TCS, the expenses of which be deposited by the appellant. within three days, while the local respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar.

Rs-700/-
Appellant Deposited
Security & Process Fee

A. Mujib
4/7/22

(Kalim Arshad Khan)
Chairman

27/07/2022

Due to summer vacation case
up 28/07/2022

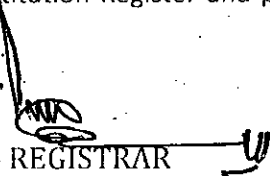
Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1087/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/07/2022	<p>The appeal of Mr. Wasim Abbas presented today by Mr. Saleemullah Khan Ranazai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">CHAIRMAN</p>

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

service appeal No. 1087/2022

Wasim Abbas

Versus

Government of Khyber Pakhtunkhwa, etc.

Index

<u>S.NO.</u>	<u>PARTICULARS OF THE CASE.</u>	<u>ANNEXURES.</u>	<u>PAGES.</u>
1.	Memo and grounds of appeal.		1-5
2.	Copies of appointment order & arrival report	'A'	6-8
3.	Copies of order dated 08.02.2016 arrival report	'B'	9-14
4.	Copies of order dated 04.03.2021 & arrival report	'C'	15-18
5.	Copies of tentative seniority list of BPS-16 dated 27.08.2021 & 10.03.2021	'D'	19-28
6.	Copy of corrigendum dated 10.03.2022	'E'	29
7.	Copy of objection petition 15.03.2022	'F'	30-33
8.	Copy of departmental appeal/representation 24.03.2022	'G'	34-37
9.	Copies of tentative seniority list dated 10.03.2021	'H'	38-44
10.	Copy of minutes of the meeting	'I'	45-46
11.	Copies of order	'J'	47-49
12.	Service Rules		50-54
13.	Vakalatnamas.		55-56

Your Humble appellant;



(Wasim Abbas)
Through counsel,

Dated: 04.07.2022



(Saleemullah Khan Rana)
Advocate Supreme Court.

(D) (01)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No. 1087/2022

Wasim Abbas, Assistant BPS-16, in the office of District Public Prosecutor, D.I.Khan.
(Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Home Department, Peshawar.
2. Director General Prosecution, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Director Administration, Khyber Pakhtunkhwa, Peshawar.
4. Regional Director Prosecution, D.I.Khan region D.I.Khan.
5. District Public Prosecutor, Dera Ismail Khan.

(Respondents)

SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE NON DECISION BY THE RESPONDENTS OF THE DEPARTMENTAL REPRESENTATION, DATED 15.03.2022 OF THE APPELLANT AGAINST THE ORDER DATED 10.03.2022, WHEREBY DESPITE THE PROMOTION ORDER DATED 04.03.2021, THE APPELLANT WAS SHOWN AS SENIOR CLERK INSTEAD OF ASSISTANT IN THE SENIORITY LIST ISSUED ON 10.03.2022 WAS NEVER DECIDED TILL THE EXPIRY OF 90 DAYS BY THE COMPETENT AUTHORITY I.E THE RESPONDENT NO.2 THE DIRECTOR GENERAL PROSECUTION KHYBER PAKHTUNKHWA PESHAWAR

Respectfully Sheweth,

The appellant prefers the instant petition on the grounds hereinafter submitted apropos the following facts.

(Note:- The addresses of respondents as given above are sufficient for the purpose of service.)

Brief Facts:

1. That the appellant was posted in the office of DPP D.I.Khan as junior clerk vide order No. DP/E&A /1(09)09/VOL-II 6696-6727 dated 30th October, 2009, whereon the appellant joined duty at the office of DPP D.I.Khan vide arrival report dated 03.11.2009. Copy of appointment order and arrival report is enclosed herewith as Annexure-A.
2. That the appellant was promoted to the post of Senior Clerk BS-14 vide order No.DP/E&A/1(100)/1341-1420 dated 08.02.2016 and assumed the charge to the

post of Senior Clerk in the office of DPP D.I.Khan dated 10.02.2016. Copies of order dated 08.02.2016 & arrival report dated 10.02.2016 is enclosed herewith as Annexure-B.

3. That the appellant was again promoted to the post of Assistant (BS-16) vide order No. DP/E&A/1(100)2785-2810 dated 04.03.2021 on the recommendation of Departmental promotion committee along with 16 other officials on Regular Basis and posted vide the same order as assistant BS-16 in the office of District Public Prosecutor D.I.Khan, and thereupon, the appellant assumed the charge of Assistant in the office of DPP D.I.Khan on 05.03.2021. Copies of order dated 04.03.2021 & arrival report dated 05.03.2021 is enclosed herewith as Annexure-C.
4. That After promotion to the post of Assistant, a tentative seniority list of assistant BS-16 was formulated and communicated vide Deputy Director Administration letter No. DP/E&A/1(66)10750-90 dated 27-08-2021, wherein the appellant was placed on serial No.38. Copies of tentative seniority list of assistant BPS-16 dated 27.08.2021 and 20.10.2021 are enclosed herewith as Annexure-D.
5. That, astonishingly another illegal, unconstitutional and against the law and facts corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 was issued by the worthy Director General Prosecution, Khyber Pakhtunkhwa vide which the appellant and 13 others Assistants (BS-16) were reverted from Assistant (BS-16) Regular to Assistant (BS-16) on Acting Charge Basis, though the appellant and 16 other Assistants has successfully completed the period of probation but for the issuance of said impugned illegal corrigendum neither meeting of DSC was convened nor the approval of the competent authority was sought. Copy of corrigendum dated 10.03.2022 is enclosed herewith as Annexure-E.
6. That due to the said impugned illegal corrigendum the appellant and 13 others were placed in the seniority list of Senior Clerks (BS-14), which seniority list was objected to by the appellant. Copy of the objection petition dated 15.03.2022 is enclosed herewith as Annexure-F.
7. Aggrieved from the illegal and irrational impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 issued by the worthy Director General Prosecution, Khyber Pakhtunkhwa, the appellant preferred department representation/appeal on 24.03.2022. Copy of department appeal/ representation is enclosed herewith as Annexure-G.
8. That the departmental representation/ appeal was never replied by the competent authority within the stipulated period and after expiry of the stipulated period the appellant is now preferring the instant service appeal inter alia on the following grounds.

GROUNDS:

- i. That the impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 is patently illegal, arbitrary, fanciful, perverse, unlawful and against the facts, hence liable to be set-aside.
- ii. That admittedly the appellant has been promoted to the post of assistant BPS-16 vide order dated 04.03.2021 in a joint promotion order, wherein the appellant is appearing at serial No.5, so how come in the seniority of assistants issued on 10.03.2022, his name is missing rather his name is appearing on the tentative list of senior clerks (BPS-14) at serial No.2 and in the column of remarks it has been mentioned that he has been appointed as assistant on acting charge base which entry is totally incorrect, rather the name of the appellant should have been mentioned in the seniority list of assistants at serial No.38 prior to those five persons who have been directly appointed on 05.03.2021. Copy of the tentative seniority list dated 10.03.2021 is enclosed herewith as Annexure-H.
- iii. That in the meeting held on 10.02.2021 by the departmental promotion committee it has been specifically been mentioned that there are 17 vacant posts of Assistant BPS-16, wherein the method has also been mentioned that 25% posts should be filled by initial recruitment, whereas 75% posts should be filled by promotion on the basis of seniority cum fitness from senior clerks and in the said meeting the appellant along with others were recommended for promotion on regular basis and the name of appellant is appearing at serial No.6. Copy of minutes of the meeting is enclosed herewith as Annexure-I.
- iv. That till date as per knowledge of the appellant only 10 persons have been promoted/ appointed to the post of Assistant BPS-16, wherein 03 persons have been departmentally promoted and 05 Assistant has been directly recruited on dated 05.03.2021 while the 02 assistants are directly appointed on 03.05.2022. Copies of order are enclosed herewith as Annexure-J.
- v. That when there were 17 posts of assistant lying vacant and the departmental promotion committee also recommended the promotion of certain senior clerks, including the appellant, which was strictly in accordance with law then what was the compelling circumstances, which prompted the competent authority to issue corrigendum and kept the vacant posts as vacant.
- vi. That as mentioned above the appellant is not posted as senior clerk nor he has been given promotion to BPS-16 on acting charge base, as the order dated 04.03.2021 is very much clear that the appellant along with 16 others have been promoted to the post of Assistant BPS-16 on regular basis, then why his name is not mentioned in the list of assistant rather he has been

DL

shown to be senior clerk BPS-14 and promoted to BPS -16 on acting charge base.

vii. That valuable rights of the appellant have been accrued by the promotion order, which under the law cannot be snatched, without any solid reason.

viii. That it is pertinent to mention here that the directly recruited five assistants were although junior to the appellant but because of the corrigendum, they will become senior to the appellant, as shown in the seniority list, wherein the name of the appellant is in the list of senior clerks and not as Assistant.

ix. That the appellant was promoted on regular basis on the recommendation of Departmental Promotion Committee to the post of Assistant on regular basis and has served since then in the same post for more than a year, therefore, the probation period provided for the post was successfully completed and neither the appellant was reported by the reporting officer for incompetence nor for any mis-conduct, thus issuance of impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 for converting the regular promotion of the appellant to one on acting charge basis is not only arbitrary but also perverse and against the law and service rules of this province. Hence, the impugned corrigendum order needs to be struck down.

x. That great injustice has been done to the appellant by issuing the impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022, whereby the regular promotion of the appellant has been converted illegally and unconstitutionally to one on acting charge basis, and by the operation of said impugned order, 05 Assistants BS-16 who were appointed through direct recruitment later in time to the promotion of the appellant were declared seniors to the appellant, the operation of said impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 is not only a colorful exercise of authority but also against the norms of natural Justice and Service Laws and rules, hence the impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 is not sustainable.

xi. That no notice of any kind regarding changing the position of the appellant from regular Assistant BPS-16 to acting charge base was served upon the appellant and after serving more than one year the impugned corrigendum was issued, without any justification, therefore, the same is liable to be set-aside.


- (5)
- xii. That counsel for the appellant may be allowed to raise additional ground at the time of arguments.

PRAYER:

It is, therefore, humbly prayed that the appeal in hand be accepted and the impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 and subsequent seniority list, wherein the appellant has been shown as senior clerk with assistant on acting charge base may be please be set-aside and the appellant may be ordered to be validly promoted as Assistant BS-16 on Regular Basis from the date of order with all back benefits.

Dated:04.07.2022

Your humble appellant;


WASIM ABBAS,
ASSISTANT (BS-16),
O/O D.P.P, D.I.Khan.
Through counsel


(Saleemullah Khan Ranazai)
Advocate Supreme Court.

AFFIDAVIT

I, Wasim Abbas, Assistant BPS-16, in the office of District Public Prosecutor, D.I.Khan, appellant do hereby solemnly affirm on Oath that the contents of the petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

Dated: 04.07.2022





Deponent.
(Identified by) 0345 9871586


(Saleemullah Khan Ranazai)
Advocate Supreme Court.

Phon 03339159808

ORDER:

(2)
Annex B (A)

No. DP/E&A/1 (09)09/Vol-II 6696-6721 On the recommendation of the Departmental Selection Committee (D.S.C) contained in the minutes of the meeting held on 29-10-2009 the following candidates are appointed as Junior Clerks (BPS-07), Naib Qasids (BPS-02), and Chowkidar (BPS-02) in the Districts, noted against each, on the contract basis, and as per the Government Policy in vogue, with immediate effect and in the public interest.

S.No	Name Of the Officials	Designation	Place of Posting
1	Mr. Shah Fahad S/o Abdul Rasheed	Junior Clerk (BPS-07)	Mardan
2	Mr. Shah Zeb S/o Zain ullah	Junior Clerk (BPS-07)	Mardan
3	Mr. Tariq Khan S/o Nouroz Khan	Junior Clerk (BPS-07)	Charsadda
4	Mr. Shamshad Iqbal S/o Shindi Gul	Junior Clerk (BPS-07)	Bannu
5	Mr. Waseem Abbas S/o Ijaz Hussain	Junior Clerk (BPS-07)	D.I.Khan
6	Mr. Akhtar Hussain S/o Abdul Sadiq	Junior Clerk (BPS-07)	Swat
7	Mr. Syed Musawir Shah S/o Said Zahir Shah	Junior Clerk (BPS-07)	Swabi.
8	Mr. Muhammad Khan S/o Hijab Gul	Naib Qasid (BPS-02)	Peshawar
9	Mr. Bilal Ahmad S/o Waheed Jan	Naib Qasid (BPS-02)	Peshawar.
10	Mr. Muhammad Nawaz S/o Khaista Khan	Naib Qasid (BPS-02)	Dir (Lower).
11	Mr. Rashid Rasheed S/o Abdul Rasheed	Chowkidar (BPS-02)	Abbottabad

- The appointees shall remain on probation for a period of one year.

October, 30, 2009

9

2. The appointees shall furnish Medical Fitness Certificate from the Medical Superintendent of the concerned District Head Quarter Hospital.

3. The appointees shall report to the office of District Public Prosecutor concerned within seven days.

Atta Ullah Khan
(ATTA ULLAH KHAN)
Director General Prosecution
NWFP

Endst: No. & date even:

Copy forwarded for information to:-

1. The Additional Chief Secretary to Govt. of NWFP, Home & Tribal Affairs Department.
2. The Accountant General NWFP, Peshawar.
3. The District Public Prosecutor, Peshawar, Mardan, Charsadda, D.I.Khan, Bannu, Swat, Dir (Lower), Swabi, Abbottabad.
4. The District Accounts Officers, Mardan, Charsadda, D.I.Khan, Bannu, Swat, Dir (Lower), Swabi, Abbottabad.
5. The Officials concerned.

Atta Ullah Khan
Director General Prosecution
NWFP

IN COMPLIANCE WITH THE PROVISIONS OF SECTION 106(1)(G) OF THE GOVERNMENT OF NAGALAND REGULATIONS UNDER THE GOVERNMENT OF NAGALAND ACT 1963, DATED 20-10-2007, I, THE DISTRICT PUBLIC PROSECUTOR, HEREBY ASSIGNED THE CHARGE OF THE CASE - JAIL (MURDER) OF THE DISTRICT PUBLIC PROSECUTOR, DATED TODAY ON 03-10-2009 (2009-1000)

Wia
 (Name of the Officer)
 Senior Clerk, No. 07.

No. 410-14 / dt. dated this 03 / 10 / 2009
 Copy forwarded to:-

1. The worthy Director General Prosecution, Directorate of Prosecution, Government of Nagaland, for information.
2. The Additional Chief Secretary to Govt of Nagaland, Home & Tribal Affairs Department, Kohima.
3. The Assistant General, Nagaland, Kohima.
4. The District Accounts Officer, Kohima.
5. The Official concerned.

[Signature]
 District Public Prosecutor, Nagaland
 4/1



DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No. DP/

(Date: Peshawar 08/02/2016)

Office Phone # 091-9212559/ 091-9212542

Fax # 091-9212559

E-mail: kpprosecution@yahoo.com

ORDER:

No. DP/E&A/1(100)/1341-(42)- On the recommendation of the Departmental Promotion Committee (D.P.C) dated 29-01-2016, the following Junior Clerks (BPS-11) of this Directorate are promoted to the post of Senior Clerk (BPS-14), on regular basis with immediate effect:-

S.No	Name	Present Posting
1	Syed Nazmat Ali Shah	Office of the District Public Prosecutor, Peshawar
2	Muhammad Hamayoon	Office of the District Public Prosecutor, Lakki Marwat
3	Qamar Zaman	Office of the District Public Prosecutor, Tank
4	Muslim Khan	Office of the District Public Prosecutor, Peshawar
5	Sikandar Hayat	Office of the District Public Prosecutor, Dir Upper
6	Mubarak Ahmad	Directorate of prosecution
7	Muhammad Iqbal	Office of the District Public Prosecutor, Lakki Marwat
8	Shahid Gul	Office of the District Public Prosecutor, Hangu
9	Mumraiz Khan	Office of the District Public Prosecutor, Peshawar
10	Syed Hakeem Shah	Office of the District Public Prosecutor, Swat
11	Abdul Wahid	Office of the District Public Prosecutor, Tank
12	Sakhawat Shah	Office of the District Public Prosecutor, Malakand
13	Muhammad Arshad	Office of the District Public Prosecutor, Battagram
14	Malik Rehmat Ali	Office of the District Public Prosecutor, Peshawar
15	Yaqoob Khan	Office of the District Public Prosecutor, Bannu

16	Khairullah Jan	Directorate of Prosecution
17	Fida Muhammad	Directorate of Prosecution
18	Muhammad Ali	Office of the District Public Prosecutor, Mardan
19	Muhammad Yousaf	Office of the District Public Prosecutor, Bannu
20	Aurangzeb	Office of the District Public Prosecutor, Dir Lower
21	Musawir Jan	Office of the District Public Prosecutor, Charsadda
22	Ajmal Khan	Office of the District Public Prosecutor, Swabi
23	Sahibzada	Office of the District Public Prosecutor, Swabi
24	Said Rehman	Office of the District Public Prosecutor, Swat
25	Tariq Ahmad	Office of the District Public Prosecutor, Swat
26	Hazrat Muhammad	Office of the District Public Prosecutor, Malakand
27	Muhammad Saeed	Office of the District Public Prosecutor, Abbottabad
28	Jehan Alam	Office of the District Public Prosecutor, Shangla
29	Sadar Ayub	Office of the District Public Prosecutor, Kohistan
30	Waheed Akhtar	Office of the District Public Prosecutor, Kohat
31	Fazle Rabi	Office of the District Public Prosecutor, Peshawar
32	Raja Arshad	Office of the District Public Prosecutor, Abbottabad
33	Muhammad Ashraf	Office of the District Public Prosecutor, Peshawar
34	Shamshad Iqbal	Office of the District Public Prosecutor, Bannu
35	Tariq Khan	Office of the District Public Prosecutor, Charsadda
36	Akhtar Hussain	Office of the District Public Prosecutor, Swat
37	Waseem Abbas	Office of the District Public Prosecutor, D.I.khan

2. The above senior clerks will be on probation for period of one year in terms of section-6(2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rules-15(1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Consequent upon promotion of the above mentioned Senior Clerks the following posting transfer are hereby ordered.

S.No	Name	From	To	Remarks
1	Syed Nazmat Ali Shah	Office of the District Public Prosecutor, Peshawar	Office of the District Public Prosecutor, Peshawar	Against the Vacant Post
2	Muhammad Hamayoon	Office of the District Public Prosecutor, Lakki Marwat	Office of the District Public Prosecutor, Lakki Marwat	-do-
3	Qamar Zaman	Office of the District Public Prosecutor, Tank	Office of the District Public Prosecutor, D.I.Khan	-do-
4	Muslim Khan	Office of the District Public Prosecutor, Peshawar	Directorate of Prosecution, Peshawar	-do-
5	Sikandar Hayat	Office of the District Public Prosecutor, Dir Upper	Office of the District Public Prosecutor, Dir Upper	-do-
6	Mubarak Ahmad	Directorate of prosecution, Peshawar	Directorate of Prosecution, Peshawar	-do-
7	Muhammad Iqbal	Office of the District Public Prosecutor, Lakki Marwat	Office of the District Public Prosecutor, Kohat	-do-
8	Shahid Gul	Office of the District Public Prosecutor, Hangu	Office of the District Public Prosecutor, Hangu	-do-
9	Mumraiz Khan	Office of the District Public Prosecutor, Peshawar	Directorate of Prosecution, Peshawar	-do-
10	Syed Hakeem Shah	Office of the District Public Prosecutor, Swat	Office of the District Public Prosecutor, Nowshera	-do-
11	Abdul Wahid	Office of the District Public Prosecutor, Tank	Office of the District Public Prosecutor, Tank	-do-
12	Sakhawat Shah	Office of the District Public Prosecutor, Malakand	Office of the District Public Prosecutor, Buner	-do-
13	Muhammad Arshad	Office of the District Public Prosecutor, Battagram	Office of the District Public Prosecutor, Battagram	-do-
14	Malik Rehmat Ali	Office of the District Public Prosecutor, Peshawar	Office of the District Public Prosecutor, Peshawar	-do-

15	Yaqoob Khan	Office of the District Public Prosecutor, Bannu	Office of the District Public Prosecutor, Bannu	-do-
16	Khairullah Jan	Directorate of Prosecution, Peshawar	Directorate of Prosecution, Peshawar	-do-
17	Fida Muhammad	Directorate of Prosecution, Peshawar	Directorate of Prosecution, Peshawar	-do-
18	Muhammad Ali	Office of the District Public Prosecutor, Mardan	Office of the District Public Prosecutor, Mardan	-do-
19	Muhammad Yousaf	Office of the District Public Prosecutor, Bannu	Office of the District Public Prosecutor, Bannu	-do-
20	Aurangzeb	Office of the District Public Prosecutor, Dir Lower	Office of the District Public Prosecutor, Dir Lower	-do-
21	Musavir Jan	Office of the District Public Prosecutor, Charsadda	Office of the District Public Prosecutor, Mardan	-do-
22	Ajmal Khan	Office of the District Public Prosecutor, Swabi	Office of the District Public Prosecutor, Swabi	-do-
23	Sahibzada	Office of the District Public Prosecutor, Swabi	Office of the District Public Prosecutor, Haripur	-do-
24	Said Rehman	Office of the District Public Prosecutor, Swat	Office of the District Public Prosecutor, Chitral	-do-
25	Tariq Ahmad	Office of the District Public Prosecutor, Swat	Office of the District Public Prosecutor, Swat	-do-
26	Hazrat Muhammad	Office of the District Public Prosecutor, Malakand	Office of the District Public Prosecutor, Malakand	-do-
27	Muhammad Saeed	Office of the District Public Prosecutor, Abbottabad	Office of the District Public Prosecutor, Abbottabad	-do-
28	Jehan Alam	Office of the District Public Prosecutor, Shangla	Office of the District Public Prosecutor, Shangla	-do-
29	Sadar Ayub	Office of the District Public Prosecutor, Kohistan	Office of the District Public Prosecutor, Kohistan	-do-
30	Wahced Akhtar	Office of the District Public Prosecutor, Kohat	Office of the District Public Prosecutor, Kohat	-do-
31	Fazle Rabi	Office of the District Public Prosecutor, Peshawar	Office of the District Public Prosecutor, Peshawar	-do-

2/8/2

32	Raja Arshad	Office of the District Public Prosecutor, Abbottabad	Office of the District Public Prosecutor, Abbottabad	-do-
33	Muhammad Ashraf	Office of the District Public Prosecutor, Peshawar	Directorate of Prosecution, Peshawar	-do-
34	Shamshad Iqbal	Office of the District Public Prosecutor, Bannu	Office of the District Public Prosecutor, Karak	-do-
35	Tariq Khar	Office of the District Public Prosecutor, Charsadda	Office of the District Public Prosecutor, Charsadda	-do-
36	Akhtar Hussain	Office of the District Public Prosecutor, Swat	Office of the District Public Prosecutor, Swat	-do-
37	Waseem Abbas	Office of the District Public Prosecutor, D.I.khan	Office of the District Public Prosecutor, D.I.Khan	-do-

--sd/--

(SHAFIR ULLAH)
Director General Prosecution
Khyber Pakhtunkhwa

Copy forwarded for information to the:-

1. Secretary to Govt. of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Peshawar.
2. Accountant General Office, Khyber Pakhtunkhwa, Peshawar.
3. All concerned District Public Prosecutor Offices.
4. All concerned District Accounts Offices.
5. All Officials concerned.
6. Establishment section of this Directorate.

Handwritten signature/initials


Handwritten signature/initials

(IRSHAD ULLAH AFRIDI)
Deputy Director Admin./Finance

(14)

CHARGE ASSUMPTION REPORT

In compliance with the order contained in Endst: No. DP/E&A/1(100) 1341-1420 dated: 08-02-2016, issued by the Worthy Director General Prosecution Govt; of Khyber Pakhtunkhwa, Directorate of Prosecution Peshawar. I, Mr. Wasim Abbas, hereby assume the charge of the post of office Senior Clerk (BPS-14) against vacant Post in the office of the District Public Prosecutor Dera Ismail Khan today i.e 10-02-2016. (After-noon)

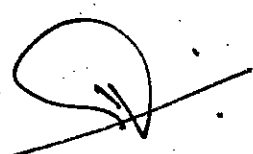

(Wasim Abbas)
Senior Clerk (BPS-14)
office of the DPP D.I.K.

Endst: No. 140-64 /DPP

Dated 10/02/2016 The; 10/02/2016

Copy forwarded for information to:-

1. The Secretary to Govt; of Khyber Pakhtunkhwa, Home & TA's Department Peshawar.
2. The Worthy Director General of Prosecution Govt: of Khyber Pakhtunkhwa Peshawar.
3. The Accountant General KPK Peshawar.
4. The District Accounts officer Dera Ismail Khan.
5. The official concerned


District Public Prosecutor
Dera Ismail Khan
10/2/16



DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No. DP-
Dated Peshawar 4 March 2021
Office Phone # 091-0212659/091-0212642
Fax # 091-0212663
E-mail: kpp prosecution@yahoo.com

A (C)
15

ORDER:

No. DP/EAA/1(100) 2785-2810 :- On the recommendation of the Departmental Promotion Committee (DPC), the following Senior Clerks (BS-14) of this Directorate are hereby promoted to the post of Assistant (BS-16) on regular basis with immediate effect:-

Sr. No.	Name of Official	Office
1.	Mr. Bashir Ahmad	District Public Prosecutor office Chitral
2.	Mr. Muhammad Ashraf	District Public Prosecutor office Peshawar
3.	Mr. Shamshad Iqbal	District Public Prosecutor office Bannu
4.	Mr. Tariq Khan	District Public Prosecutor office Charsadda
5.	Mr. Waseem Abbas	District Public Prosecutor office D I Khan
6.	Mr. Shah Fahad	District Public Prosecutor office Mardan
7.	Mr. Shah Zeb	District Public Prosecutor office Nowshera
10.	Mr. Bakht Pervesh	District Public Prosecutor office Haripur
9.	Mr. Wali Ur Rehman	District Public Prosecutor office Mansehra
10.	Mr. Nasir Ali	District Public Prosecutor office Dir Upper
11.	Mr. Jamshed Ahmad	District Public Prosecutor office Chitral
12.	Mr. Muhammad Zarshad	District Public Prosecutor office Swabi
13.	Mr. Muhammad Tariq Khan	District Public Prosecutor office Lakki Marwat
14.	Mr. Taj Rehman	District Public Prosecutor office Buner
15.	Mr. Tufail Khan	District Public Prosecutor office Mardan
16.	Mr. Muhammad Nasir	Directorate of Prosecution
17.	Mr. Noman	District Public Prosecutor office Swat

2. The above officials will be on probation for a period of one year in terms of section-6(2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rules-15(1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

3. Consequent upon above, the following postings/transfers are hereby made with immediate effect in the public interest:

Sr. No.	Name of Official	Office	Remarks
1.	Mr. Bashir Ahmad Assistant (BS-16)	District Public Prosecutor office Chitral Lower	Retained as Assistant (BS-16) in the office of District Public Prosecutor Chitral Lower
2.	Muhammad Ashraf Assistant (BS-16)	District Public Prosecutor office Peshawar	Against the vacant post of Assistant (BS-16) in the office of District Public Prosecutor Peshawar
3.	Mr. Shamshad Iqbal Assistant (BS-16)	District Public Prosecutor office Bannu	Against the vacant post of Assistant (BS-16) in the office of District Public Prosecutor Bannu vice No. 20
4.	Mr. Tariq Khan Assistant (BS-16)	District Public Prosecutor office Charsadda	Against the vacant post of Assistant (BS-16) in the office of District Public Prosecutor Mohmand
5.	Mr. Waseem Abbas Assistant (BS-16)	District Public Prosecutor office D.I. Khan	Against the vacant post of Assistant (BS-16) in the office of District Public Prosecutor, DI Khan

Waseem
25.03.21

Shah



DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No. DP-
Dated Peshawar 4 March 2022
Office Phone # 091-9212559/091-9212558
Fax # 091-9212559
E-mail: kpprosecution@yahoo.com

(16)

S.No.	Name of Officer	Office	Remarks
6.	Mr. Shah Fahad Assistant (BS-16)	District Public Prosecutor office Mardan	In the office of District Public Prosecutor Mardan vice No.19
7.	Mr. Shah Zeb Assistant (BS-16)	District Public Prosecutor office Nowshera	Against the vacant post of Assistant (BS-16) in the Directorate of Prosecution
8.	Mr. Bakht Pervesh Assistant (BS-16)	District Public Prosecutor office Haripur	Against the vacant post of Assistant (BS-16) in the Directorate of Prosecution
9.	Mr. Wali Ur Rehman Assistant (BS-16)	District Public Prosecutor office Mansehra	Office of District Public Prosecutor Mansehra Vice No.18
10.	Mr. Nasir Ali Assistant (BS-16)	District Public Prosecutor office Dir Upper	Office of District Public Prosecutor Dir Upper Vice No.25
11	Mr. Jamshed Ahmad Assistant (BS-16)	District Public Prosecutor Office Chitral Lower	Against the vacant post of Superintendent (BS-17) in his own pay scale in District Public Prosecutor office Upper Chitral
12	Muhammad Zarshad Assistant (BS-16)	District Public Prosecutor office Swabi	Against the vacant post of Assistant (BS-16) in the Directorate of Prosecution
13	Muhammad Tariq Khan Assistant (BS-16)	District Public Prosecutor office Lakki Marwat	Against the vacant post of Assistant (BS-16) in the office of District Public Prosecutor Lakki Marwat
14	Mr. Taj Ur Rehman Assistant (BS-16)	District Public Prosecutor office Buner	office of District Public Prosecutor Buner Vice No.24
15	Mr. Tufail Khan Assistant (BS-16)	District Public Prosecutor office Mardan	office of District Public Prosecutor Mardan Vice No. 22
16	Muhammad Nasir Assistant (BS-16)	Directorate of Prosecution	Against the vacant post of Assistant (BS-16) in the Directorate of Prosecution, Khyber Pakhtunkhwa
17	Mr. Noman Assistant (BS-16)	District Public Prosecutor office Swat	Against the vacant post of Assistant (BS-16) in the office of District Public Prosecutor Bajaur
18	Muhammad Arshad Assistant (BS-16)	District Public Prosecutor Mansehra	District Public Prosecutor Office Battagram Vice No.21
19	Mr. Sakhawat Shah Assistant (BS-16)	District Public Prosecutor office Mardan	Against the vacant post of Superintendent (BS-17) (OPS) in the District Public Prosecutor office Swat
20.	Mr. Yaqoob Khan Assistant (BS-16)	District Public Prosecutor office Bannu	Against the vacant post of Superintendent (BS-17) (OPS) in District Public Prosecutor office Bannu
21	Muhammad Arshad Assistant (BS-16)	District Public Prosecutor Office Battagram	Against vacant post of Assistant (BS-16) in office of District Public Prosecutor, Abbottabad
22	Mr. Sahibzada Assistant (BS-16)	District Public Prosecutor Office Mardan	District Public Prosecutor Office Swabi Vice No.23
23	Mr. Ajmal Khan Assistant (BS-16)	District Public Prosecutor Office Swabi	Against the vacant post of Assistant (BS-16) in the Directorate of Prosecution
24	Syed Hakeem Shah Assistant (BS-16)	District Public Prosecutor Office Buner	Against the vacant post of Assistant (BS-16) in District Public Prosecutor Office Haripur
25	Mr. Asfandiyar Gul Senior Clerk (BS-14)	Assistant (BS-16) OPS District Public Prosecutor office Dir Upper	As Senior Clerk (BS-14) in District Public Prosecutor office Dir Upper



DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No. DP-
Dated Peshawar 4 March 2021
Office Phone # 091-9212559/ 091-9212648
Fax # 091-9212559
E-mail: kprosecution@yahoo.com

No.	Name of Official	From	To
26	Muhammad Yahya Senior Clerk (BS-14)	District Public Prosecutor office Battagram	As Senior Clerk (BS-14) in District Public Prosecutor office, Chitral Lower
27	Mr. Halder Ali Senior Clerk (BS-14)	District Public Prosecutor office Shangla	As Senior Clerk (BS-14) Regional Director Office Malakand vice No.30
28	Mr. Salam-Ud-Din Senior Clerk (BS-14)	District Public Prosecutor office Kohistan Upper	As Senior Clerk (BS-14) District Public Prosecutor office Shangla vice No.27
29	Mr. Nasibullah Senior Clerk (BS-14)	District Public Prosecutor office Haripur	Against the vacant post of Senior Clerk (BS-14) District Public Prosecutor office Mardan
30	Mr. Amjad Ali Senior Clerk (BS-14)	Regional Director Office Malakand	Against the vacant post of Senior Clerk (BS-14) District Public Prosecutor office Swat
31	Mr. Said Nawaz Senior Clerk (BS-14)	District Public Prosecutor office Swabi	Against the vacant post of Senior Clerk (BS-14) District Public Prosecutor office Buner
32	Muhammad Maaz Junior Clerk (BS-11)	Directorate of Prosecution	Against the vacant post of Senior Clerk (BS-14) in his own pay scale District Public Prosecutor Office Charsadda.

-Sd-
Director General Prosecution
Khyber Pakhtunkhwa

Copy Forwarded for Information to the:-

1. Accountant General office, Khyber Pakhtunkhwa Peshawar
2. Concerned District Public Prosecutor offices.
3. Concerned District Accounts offices
4. P.S to Secretary to Government of Khyber Pakhtunkhwa, Home Department, Peshawar
5. PA to Director General Prosecution, Khyber Pakhtunkhwa.
6. Officers concerned.
7. Assistant Director IT, Incharge HR.
8. Personal files of the officials.

2. *[Signature]*
Deputy Director Administration

4/3/21

19

CHARGE ASSUMPTION REPORT

In compliance with the order vide No.DP/E&A/1(100)/2785-2810 dated 04-March-2021 issued by the Worthy Director General Prosecution Govt; of Khyber Pakhtunkhwa, Directorate of Prosecution Peshawar. I, **Wasim Abbas** Assistant.(BPS-16) do hereby assume the charge of the vacant post of Assistant (BPS-16), in the office of the District Public Prosecutor Dera Ismail Khan today i.e 05-03-2021. (Fore-noon)


(Wasim Abbas)
Assistant (BPS-16)
DPP Office D.I.Khan

Endst: No. 359-64/DPP/DIK

Dated D.I.Khan: 05-03-2021

Copy forwarded for information to:-

1. The P.S Secretary, Home Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director General Prosecution, Directorate of Prosecution Govt; of K.P.K Peshawar.
3. The Regional Director Prosecution, D.I.Khan Division D.I.Khan.
4. The District Public Prosecutor Dera Ismail Khan.
5. The District Accounts Officer Dera Ismail Khan.
6. Official concerned.


District Public Prosecutor
Dera Ismail Khan

DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No. DP/EA/11(66) / 2021
Dated Peshawar 27-8/2021
Office Phone # 091-9212559
Fax # 091-9212559
E-mail kpprosecution@yahoo.com

To

✓ All Regional Director Prosecution/District Public Prosecutors,
In Khyber Pakhtunkhwa.

Attention: All Assistants (BPS-16), Senior Clerk (BS-14), Junior Clerk (BS-11) and Class-IV (BS-03).

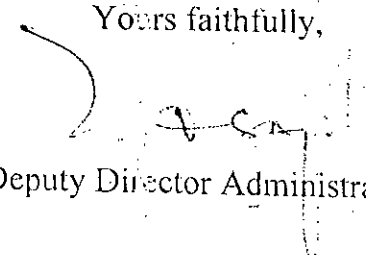
Subject: - TENTATIVE SENIORITY LIST OF ASSISTANT (BS-16), SENIOR CLERK (BS-14), JUNIOR CLERK (BS-11) AND CLASS-IV (BS-03).

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of Tentative Seniority List of Assistants (BS-16), Senior Clerks (BS-14), Junior Clerks (BS-11) and Class-IV (BS-03) of the Directorate of Prosecution, Khyber Pakhtunkhwa. The same may be handed over to all the concerned Officials working under your kind control for information and further necessary action.

Furthermore, it is asked to submit their objections, if any, to this Directorate for necessary action within 14- days positively, otherwise the same will be considered as "Final Seniority List", please.

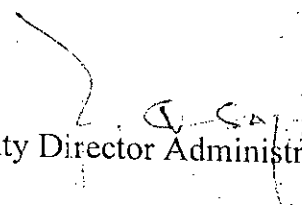
Yours faithfully,


Deputy Director Administration

(Incl: as above)

Copy forwarded for information to the:

1. PA to Director General Prosecution, Khyber Pakhtunkhwa.


Deputy Director Administration

(2)

TENTATIVE SENIORITY LIST OF OFFICE ASSISTANT BPS-16, IN DIRECTORATE OF PROSECUTION PESHAWAR Khyber
Pakhtunkhwa, 2021

S.NO	Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post			Present Posting
					Date	BS	Method of Recruitment	
1.	Muhammad Hamayoon	B.A.	28/10/1967 Lakki Marwat	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, Orakzai
2.	Qamar Zaman	B.A.	20/01/1970 Tank	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, south Waziristan
3.	Muslim Khan	Matric	07/01/1966 Charsadda	26-07-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Peshawar
4.	Sikandar Hayat	Matric	15/11/1964 Dir Lower	15-08-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	appointed as superintendent (bs-17) on acting charge basis office of the district public prosecutor, upper dir
5.	Mubarik Ahmad	F.A.	04/12/1961 Charsadda	29-11-1987 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of prosecution, Charsadda
6.	Muhammad Iqbal	B.Com	05/05/1970 Lakki Marwat	13-09-1989 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Base Office of the District Public Prosecutor, Bannu
7.	Shahid Gul	Matric	05/05/1963 Kohat	19-09-2000 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis DPP Kurram
8.	Mumraiz Khan	Matric	04/04/1970 Peshawar	19-09-2000 Naib Qasid BS-01	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Khyber
9.	Shakeel Akhtar	Matric	15/03/1977 Nowshera	17-04-1994 Assistant BS-16	17/02/2019	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis DPP Mohammad
10.	Syed Ibrar Shah	Matric	1976 Mansehra	10-03-2003 Naib Qasid BS-01	05/04/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Torghar
11.	Syed Hakeem Shah	Matric	05/02/1962 Buner	30-06-1996 Junior Clerk BS-05	17/11/2017	15	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, buner

Copies forwarded for info:

1. PA to Director General Prosecution, Khyber Pakhtunkhwa.

S.NO	Name	Qualification	DOB & Domicile	Date of First Entry to Service with Designation & BPS	Regular Appointment / Promotion to Present Post			Present Posting
					Date	BS	Method of Recruitment	
					17/11/2017	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, tank
12.	Abdul Wahid	Matric	16/03/1972 Tank	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, swat
13.	Sakhawat Shah	B.A	10/04/1975 Buner	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, batagram
14.	Muhammad Arshad	Matric	01/06/1977 Mansehra	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Khyber
15.	Malik Rehmat Ali	Matric	04/04/1981 Peshawar	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Bannu
16.	Muhammad Yousaf	B.A	24/04/1964 Bannu	24-04-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, DIR LOWER
17.	Aurangzeb	Matric	01/03/1963 Dir Lower	17-08-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWABI
18.	Ajmal Khan	Matric	24/11/1967 Swabi	03-12-1989 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Swabi
19.	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWAT
20.	Said Rehman	F.A	20/03/1974 Swat	26-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWAT
21.	Tariq Ahmad	Matric	03/04/1975 Swat	27-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Mansehra
22.	Syed Alam Shah	Matric	13/02/1974 Mansehra	15-03-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Malakand
23.	Hazrat Muhammad	B.A.	01/01/1970 Malakand	23-07-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Shangla
24.	Jehan Alam	B.A.	07/03/1984 Shangla	12-04-2007 Junior Clerk BS-05	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at Office of the District Public Prosecutor, Charsadda
25.	Ismail Khan	B.A	10-01-1982 MALAKAND	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at DIRECTORATE OF PROSECUTION
26.	Raisul Ahrar Bacha	B.S (Zoology)	05-07-1994 SWAT	15-03-2019 Assistant BS-16	24-06-2019	16	Appointed through KPPSC	Assistant (BS-16) at Nowshera
27.	Saba Gul	B.S (BOT ANY)	16-01-1995 MARDAN	24-06-2019 Assistant BS-16	03-09-2019	16	Appointed through KPPSC	Assistant (BS-16) at District Public Prosecutor Abbottabad
28.	Muhammad Af Shah	B.B (Hons)	26-11-1989 Abbottabad	03-09-2019 Assistant BS-16				

21

S.NO	Name	Qualification	Date of Birth & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion			Present Posting
					Date	BS	Method of Recruitment	
29.	Hanif-ur-Rehman	MA(Political Science)	01.03.1980 Bajaur	01-11-2004 Assistant BS-16	01.07.2019	16	Adjustment surplus pool	On deputation(education dept)
30.	Sadar Ayub	F.A	06/01/1985 UPPER KOHISTAN	12-04-2007 JUNIOR CLERK	12-04-2007	16	Promotion	Assistant(BS-16)at upper Kohistan
31.	Waheed Akhtar	D.COM	28/08/1987 KOHAT	12-04-2007 JUNIOR CLERK	12-04-2007	16	Promotion	Assistant(BS-16)at Kohat
32.	Fazle Rabi	MATRIC	04/02/1974 PESHAWAR	01-01-1992 NAIB QASID	01-01-1992	16	Promotion	Assistant(BS-16)at directorate of prosecution
33.	Raja Arshad	MATRIC	04/02/1974 ABBOTTABAD	30-11-1995 NAIB QASID	30-11-1995	16	Promotion	Assistant(BS-16)at Abbottabad
34.	Bashir Ahmad	Matric	05/06/1965 Chitral	12/05/1990 Junior Clerk BS-05	12/05/1990	16	Promotion	Assistant(BS-16)at Chitral lower
35.	Muhammad Ashraf	Matric	03/04/1978 Peshawar	07-07-1997 Naib Qasid BS-01	07-07-1997	16	Promotion	Assistant(BS-16)at Peshawar
36.	Shamshad Iqbal	Matric	01/06/1973 FR Bannu	01-04-2006 Junior Clerk BS-7	01-04-2006	16	Promotion	Assistant(BS-16)at Bannu
37.	Tariq Khan	B.A. LLB	01/04/1984 Charsadda	30-10-2009 Junior Clerk BS-7	30-10-2009	16	Promotion	Assistant(BS-16)at Mohmand
38.	Waseem Abbas	M.A.	05/02/1986 D.I.khan	30-10-2009 Junior Clerk BS-7	30-10-2009	16	Promotion	Assistant(BS-16) at D.I.Khan
39.	Shah Fahad	B.A	31/12/1988 Mardan	05-01-2009 Junior Clerk BS-7	05-01-2009	16	Promotion	Assistant(BS-16)at Mardan
40.	Shah Zeb	F.A	17/01/1989 Mardan	30-10-2009 Junior Clerk BS-7	30-10-2009	16	Promotion	Directorate of prosecution
41.	Bakht Pervesh	B.A.	11/04/1973 Buner	23-12-2003 Naib Qasid BS-1	23-12-2003	16	Promotion	Directorate of prosecution
42.	Nasir Ali	Matric	08/02/1974 Swat	23-12-2003 Naib Qasid BS-1	23-12-2003	16	Promotion	Assistant(BS-16)at Dir Upper
43.	Jamshad Ahmad	Matric	06/01/1976 Lower Chitral	23-12-2003 Naib Qasid BS-1	23-12-2003	16	Promotion	Assistant(BS-16)at Upper Chitral
44.	Muhammad Zarshad	Matric	18/05/1978 Swabi	23-12-2003 Naib Qasid BS-1	23-12-2003	16	Promotion	Directorate of prosecution
45.	Muhammad Tariq Khan	DAE/BA.	15/03/1991 Lakki Marwat	14-02-2014 Junior Clerk BS-14	14-02-2014	16	Promotion	Assistant(BS-16)at Lakki Marwat
46.	Taj Rehman	M.A.	24/03/1986 Buner	03-09-2012 Naib Qasid	03-09-2012	16	Promotion	Assistant(BS-16)at haripur

S.NO	Name	Qualification	Date of Birth	Date of first Entry in Service with designation & BPS	Present Post			Present Posting
					Date	BS	Method of Recruitment	
47.	Tufail Khan	M.A.	26/12/1992 Mardan	14-02-2014 Junior Clerk BS-07	14-02-2014	16	Promotion	Assistant(BS-16)at Mardan
48.	Muhammad Nasir	B.Co m	30/10/1993 Peshawar	14-02-2014 Junior Clerk BS:07	14-02-2014	16	Promotion	Directorate of prosecution
49.	Noman	M.A	26/06/1986 Swat	14-02-2014 Junior Clerk BS-07	14-02-2014	16	Promotion	Assistant(BS-16)at Bajaur
50.	Jalal Uddin	M.Phil	06-09-1990 Peshawar	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	peshawar
51.	Mubashir Dilawar	LLB	28-2-1990 Karak	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	South Waziristan
52.	Amjid Khan	MSc	8-3-1992 Peshawar	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Orakzai
53.	Hanif Ullah	MS	1-11-1994 Bajaur	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Kurram
54.	Haq Nawaz	MA	4-4-1985 Malakand	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Hangu

Director Administration
Directorate of Prosecution
Khyber Pakhtunkhwa



**DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA**

No. DP/E.A/1(66)14049-89
Dated Peshawar 20/10/2021
Office Phone # 091-9212559
Fax # 091-9212559
E-mail kp prosecution@yahoo.com

To

✓
All District Public Prosecutors,
Khyber Pakhtunkhwa.

Attention: All Assistants (BS-16) and Junior Clerks (BS-11).

Subject: - FINAL SENIORITY LIST OF ASSISTANTS (BPS-16) AND JUNIOR CLERKS (BPS-11).

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of "Final Seniority List" of the Assistants (BS-16) and Junior Clerks (BS-11) working at the strength of Directorate of Prosecution. The same may be handed over to all the officials concerned working under your kind control for information and further necessary action, please.

Yours sincerely,

Z. Q. Sajid
Deputy Director Administration

Encl: (as above)

Copy forwarded for information to the:

1. All Regional Director Prosecution Khyber Pakhtunkhwa.
2. PA to Director General Prosecution, Khyber Pakhtunkhwa.

*Sum
Inform the concerned
... Q*

Received on 25.10.2021.

No. 244 / 25-X-2021

Senior List

Z. Q. Sajid
Deputy Director Administration

Scanned with CamScanner

**FINAL SENIORITY LIST OF OFFICE ASSISTANT BPS-16, IN DIRECTORATE OF
PROSECUTION PESHAWAR Khyber Pakhtunkhwa, 2021**

S.NO	Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & RPS	Regular Appointment/Promotion to Present Post			Present Posting
					Date	BS	Method of Recruitment	
1.	Muhammad Hamayoon	B.A.	28/10/1967 Lakki Marwat	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, trakzai
2.	Qamag Zaman	B.A.	20/01/1970 Tank	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, south Waziristan
3.	Muslim Khan	Matric	07/01/1966 Charsadda	26-07-1994 Junior Clerk BS-05	17/11/2017	15	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Peshawar
4.	Sikandar Hayat	Matric	15/11/1964 Dir Lower	15-08-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	appointed as superintendent (bs-17) on acting charge basis office of the district public prosecutor, upper dir
5.	Mubarik Ahmad	F.A.	04/12/1961 Charsadda	29-11-1987 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of prosecution, Charsadda
6.	Muhammad Iqbal	B.Com	05/05/1970 Lakki Marwat	13-09-1989 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Base Office of the District Public Prosecutor, Bannu
7.	Shahid Gul	Matric	05/05/1963 Kohat	19-09-2000 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss DPP Kurram.
8.	Mumraiz Khan	Matric	04/04/1970 Peshawar	19-09-2000 Naib Qasid BS-01	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss Directorate of Prosecution, Khyber
9.	Shakeel Akhtar	Matric	15/03/1977 Nowshera	17-04-1994 Assistant BS-16	11/02/2019	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss DPP Mohammad
10.	Syed Ibrar Shah	Matric	1976 Mansehra	10-03-2003 Naib Qasid BS-01	05/04/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Torghar
11.	Syed Ilakeem Shah	Matric	05/02/1962 Buner	30-06-1996 Junior Clerk BS-05	17/11/2017	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, buner

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S.NO	Name	Qualification	DOB & Domestic	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post			Present Posting
					Date	BS	Method of Recruitment	
12.	Abdul Wahid	Matric	16/03/1972 Tank	10-03-2003 Junior Clerk BS-05	17/11/2017	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, tank
13.	Sakhawat Shah	B.A	10/04/1975 Buner	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, swat
14.	Muhammad Arshad	Matric	01/06/1977 Mansehra	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, batagram
15.	Malik Rehmat Ali	Matric	04/04/1981 Peshawar	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Khyber
16.	Muhammad Yousaf	B.A	24/04/1964 Bannu	24-04-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Bannu
17.	Aurangzeb	Matric	01/03/1963 Dir Lower	17-08-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, DIR LOWER
18.	Ajmal Khan	Matric	24/11/1967 Swabi	01-12-1989 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWABI
19.	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Swabi
20.	Said Rehman	F.A	20/03/1974 Swat	25-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWAT
21.	Tariq Ahmad	Matric	03/04/1975 Swat	27-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWAT
22.	Syed Alam Shah	Matric	13/02/1974 Mansehra	15-03-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Mansehra
23.	Hazrat Muhammad	B.A.	01/01/1970 Malakand	23-07-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Malakand
24.	Jehan Alam	B.A.	07/03/1984 Shangla	12-04-2007 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Shangla
25.	Ismail Khan	B.A	10-01-1982 MALAKAND	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at Office of the District Public Prosecutor, Charsadda
26.	Raisul Ahrar Bacha	B.S (Zoology)	05-07-1994 SWAT	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at DIRECTORATE OF PROSECUTION
27.	Saba Gul	B.S(BOT ANY)	16-01-1995 MARDAN	24-06-2019 Assistant BS-16	24-06-2019	16	Appointed through KPPSC	Assistant (BS-16) at Nowshera
28.	Muhammad Ali Shah	LLB (Hons)	26-11-1989 Abbottabad	03-09-2019 Assistant BS-16	03-09-2019	16	Appointed through KPPSC	Assistant (BS-16) at District Public Prosecutor, Abbottabad
29.	Hanif-ur-	MA(Political)	01.03.1980 Bajaur	01.12.2004 Assistant BS-16	01.07.2019	16	Adjustment surplus pool	On deputation(education deptt)

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S.NO	Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post			Present Posting
					Date	BS	Method of Recruitment	
	Rehman	Science)						
30.	Sadar Ayub	F.A	06/01/1983 UPPER KOHISTAN	12-04-2007 JUNIOR CLERK	12-04-2007	16	Promotion	Assistant(BS-16)At upper Kohistan
31.	Waheed Akhtar	D.COM	28/08/1987 KOHAT	12-04-2007 JUNIOR CLERK	12-04-2007	16	Promotion	Assistant(BS-16)at Kohat
32.	Fazle Rabi	MATRIC	04/02/1974 PESHAWAR	01-01-1992 NAIB QASID	01-01-1992	16	Promotion	Assistant(BS-16)at directorate of prosecution
33.	Raja Arshad	MATRIC	04/02/1974 ABBOTTABAD	30-11-1995 NAIB QASID	30-11-1995	16	Promotion	Assistant(BS-16)at Abbottabad
34.	Hashir Ahmad	Matric	03/06/1965 Chitral	12/05/1990 Junior Clerk BS-05	12/05/1990	16	Promotion	Assistant(BS-16)at Chitral lower
35.	Muhammad Ashraf	Matric	03/04/1978 Peshawar	07-07-1997 Naib Qasid BS-01	07-07-1997	16	Promotion	Assistant(BS-16)at Peshawar
36.	Shamshad Iqbal	Matric	01/06/1973 FR Bannu	01-04-2006 Junior Clerk BS-7	01-04-2006	16	Promotion	Assistant(BS-16)at Bannu
37.	Tariq Khan	B.A. LLB	01/04/1984 Charsadda	30-10-2009 Junior Clerk BS-7	30-10-2009	16	Promotion	Assistant(BS-16)at Mchmand
38.	Waseem Abbas	M.A.	05/02/1986 D.I.Khan	30-10-2009 Junior Clerk BS-7	30-10-2009	16	Promotion	Assistant(BS-16) at D.I.Khan
39.	Shah Fahad	B.A	31/12/1988 Mardan	05-01-2009 Junior Clerk BS-7	05-01-2009	16	Promotion	Assistant(BS-16)at Mardan
40.	Shah Zeb	F.A	17/01/1989 Mardan	30-10-2009 Junior Clerk BS-7	30-10-2009	16	Promotion	Directorate of prosecution
41.	Bakht Pervesh	B.A.	11/04/1973 Buner	23-12-2003 Naib Qasid BS-1	23-12-2003	16	Promotion	Directorate of prosecution
42.	Wali-ur-rehman	B.A	12/06/1973 Mansehra	23-12-2003 NAIB QASID BS-1	23-12-2003	16	Promotion	Assistant bs-16) at Mansehra
43.	Nasir Ali	Matric	08/02/1974 Swat	23-12-2003 Naib Qasid BS-1	23-12-2003	16	Promotion	Assistant(BS-16)at Dir Upper
44.	Jamshed Ahmad	Matric	06/01/1976 Lower Chitral	23-12-2003 Naib Qasid BS-1	23-12-2003	16	Promotion	Assistant(BS-16)at Upper Chitral
45.	Muhammad Zarshad	Matric	18/05/1978 Swabi	23-12-2003 Naib Qasid BS-1	23-12-2003	16	Promotion	Directorate of prosecution
46.	Muhammad Tariq Khan	DAE/BA.	15/03/1991 Lakki Marwat	14-02-2014 Junior Clerk BS-14	14-02-2014	16	Promotion	Assistant(BS-16)at Lakki Marwat
47.	Taj Rehman	M.A.	24/03/1986 Buner	03-09-2012 Naib Qasid	03-09-2012	16	Promotion	Assistant(BS-16)at haripur

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10-11-2020

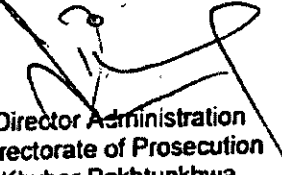
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S.NO	Name	Qualification	Date of First Entry to Service with designation & BPS	Present Post			Present Posting
				Date	BS	Method of Recruitment	
48.	Tufail Khan	M.A.	26/12/1992 Mardan 14-02-2014 Junior Clerk BS-07	14-02-2014	16	Promotion	Assistant(BS-16)at Mardan
49.	Muhammad Nasir	B.Co m	30/10/1993 Peshawar 14-02-2014 Junior Clerk BS-07	14-02-2014	16	Promotion	Directorate of prosecution
50.	Noman	M.A	26/06/1986 Swat 14-02-2014 Junior Clerk BS-07	14-02-2014	16	Promotion	Assistant(BS-16)at Bajaur
51.	Jalal Uddin	M.Phil	06-09-1990 Peshawar 5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	peshawar
52.	Mubashir Dilawar	LLB	28-2-1990 Karak 5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	South Waziristan
53.	Amjid Khan	MSc	8-3-1992 Peshawar 5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Orakzai
54.	Hanif Ullah	MS	1-11-1994 Bajaur 5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Kurram
55.	Haq Nawaz	MA	4-4-1985 Malakand 5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Hangu

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 Director Administration
 Directorate of Prosecution
 Khyber Pakhtunkhwa



(F)

**DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA**

(E)

(29)

No. _____
Dated Peshawar A. 15/3/2021
Office Phone # 091-9212559
Fax # 091-9212559
E-mail kpprosecution@yahoo.com

CORRIGENDUM ORDER:

No. DP/E.A/1(66)3618. ⁶³ In partial modification to this office Notification bearing No. DP/E&A/1 (100)2785-2810 Dated: 04-03-2021, the promotion of Senior Clerk (BPS-14) to the post of Assistant (BPS-16) from serial No. 04 to 17 may be read as acting charge basis instead of regular basis.

-Sd-
Director General Prosecution
Khyber Pakhtunkhwa.

Endst : of even No. dated:

Copy forwarded for information to:

1. All RDs/DPPs of Khyber Pakhtunkhwa.
2. All District Account Offices Khyber Pakhtunkhwa.
3. PA to Director General Prosecution, Khyber Pakhtunkhwa.
4. Officials concerned.

Deputy Director Administration



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**OFFICE OF THE DISTRICT PUBLIC PROSECUTOR
DERA ISMAIL KHAN**

No. 322-21/DPP/DIK, Dated D.I.Khan the; 15-03-2022
Office Phone & Fax # 0966-9280013
Email; dppdikhan@gmail.com

To

The Worthy Director General Prosecution
Govt: of Khyber Pakhtunkhwa Peshawar.

Subject:

**TENTATIVE SENIORITY LIST OF ASSISTANTS
(BPS-16) & SENIOR CLERK (BPS-14).**

Reference to your letter No.DP/F;A/ 1(66)3664-3709

Dated 10-03-2022.

Enclose please find herewith an objection petition /
representation by Mr. Wasim Abbas posted as Assistant
in this office for further necessary action and
consideration please.

Encls: All relevant documents are attached for ready reference.

District Public Prosecutor,
Dera Ismail Khan.

Endst: No. & date even:

Copy forwarded for information to:

The Regional Director Prosecution D.I.Khan, Division D.I.Khan

oll

District Public Prosecutor,
Dera Ismail Khan.

31

To,

The Director General, ✓
Prosecution Khyber Pakhtunkhwa,
Peshawar.

Through Proper channel

Subject: **DEPARTMENTAL REPRESENTATION/ OBJECTIONS ON THE SENIORITY LIST ISSUED VIDE OFFICE ORDER DATED 10.03.2022 IN RESPECT OF ASSISTANTS (BPS-16), VIDE WHICH THE OBJECTOR HAS BEEN SHOWN AS SENIOR CLERK INSTEAD OF ASSISTANT, WHEREAS HE HAS BEEN PROMOTED AS ASSISTANT (BPS-16) ON REGULAR BASIS VIDE ORDER DATED 04.03.2021.**

Sir,

1. That the objector was initially appointed as Junior Clerk BPS-07 vide order dated 30.10.2009 and subsequently was promoted to BPS-14 as Senior Clerk vide order dated 03.01.2018 in the Prosecution Department.
2. That the objector was then promoted to the post of Assistant, after departmental recommendation (DPC) vide order dated 04.03.2021 to BPS-16 on regular basis and was posted at office of District Public Prosecutor DIKhan. Copy of order is enclosed herewith.
3. That the department prepared final seniority list of Assistants (BPS-16) and junior clerk BPS-11 and circulated the same vide order dated 20.10.2021, wherein the objector has been shown at serial No.38 and his BS has been shown as 16, whereas the subsequent direct recruited ²⁰⁻⁵⁻³⁻²⁰²¹ assistant namely Jalal ud Din, Mubashir Dilawar, Amjad Khan, Hanifullah and Haq Nawaz were shown at serial No.51 to 55 respectively. Copy of seniority list is enclosed herewith.
4. That it was for the astonishment of the objector, when the tentative seniority list of assistants BPS-16 and Senior Clerks BPS-14 was circulated vide order dated 10.03.2022 and objections were also

invited. In the seniority list not only the directly recruited on 05.03.2021 were shown to be senior from the objector and also another astonishing fact mentioned therein is that the objector is shown in the tentative seniority list of senior clerks BPS-14 instead of the assistants BPS-16 and in the column of remarks it has been mentioned as "appointed as Assistant BPS-16 on acting charge basis at DIKhan." Copy of seniority lists are enclosed herewith.

5. That the objector being aggrieved is approaching your good-self against the order dated 10.03.2022, whereby tentative seniority lists have been issued on inter alia, the following grounds:-

GROUNDS

1. That admittedly the objector has been promoted to the post of assistant BPS-16 vide order dated 04.03.2021 in a joint promotion order, wherein the objector is appearing at serial No.5, so how come in the seniority of assistants issued on 10.03.2022, his name is missing rather his name is appearing on the tentative list of senior clerks (BPS-14) at serial No.2 and in the column of remarks it has been mentioned that he has been appointed as assistant on acting charge base which entry is totally incorrect, rather the name of the objector should have been mentioned in the seniority list of assistants at serial No.35 prior to those five persons who have been directly appointed on 05.03.2021.
2. That as mentioned above the objector is not posted as senior clerk nor he has been given promotion to BPS-16 on acting charge base, as the order dated 04.03.2021 is very much clear that the objector along with 16 others have been promoted to the post of Assistant BPS-16 on regular basis, then why his name is not mentioned in the list of assistant rather he has been shown to be senior clerk BPS-14 and promoted to BPS -16 on acting charge base.
3. That valuable rights of the objector are involved in the matter and as the seniority list issued on 10.03.2022 reached at DIKhan on 14.03.2022, as evident from the signature of Superintendent of


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DPP office, therefore, the same was handed over to the objector and he is preferring the instant objection petition / representation, well within time.

4. That the objector wished to be heard in person for the clarification of the matter in the interest of justice.

It is, therefore, humbly requested that while accepting the present objection petition / representation the seniority list issued vide 10.03.2022 may be corrected ^{revised} and the name of the objector may be mentioned in the list of Assistants BPS-16 instead of senior clerk BPS-14 at serial No.35 in preference to the directly recruited assistants to meet the ends of justice.

Thanking you in anticipation,



(Wasim Abbas)
Assistant BPS-16
At the Office of District Public Prosecutor
Dera Ismail Khan

Dated: 15.03.2022

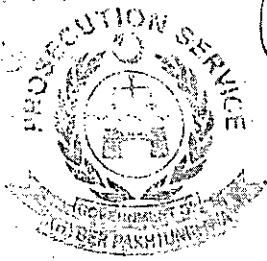
ANNEXURE - I

OFFICE OF THE DISTRICT PUBLIC PROSECUTOR
DERA ISMAIL KHAN

No. 352-53 /DPP/DIK Dated D.I.Khan the; 24-03-2022

Office Phone & Fax # 0966-9280013

Email: dppdikhan@gmail.com



To

Th Honorable Secretary

Home department

Govt. of Khyber Pakhtunkhwa Peshawar.

Subject: APPEAL AGAINST THE IMPUGNED ILLEGAL CORRIGENDUM, ORDER NO. DP/E&A/1(66)3618-63 DATED 10-03-2022 VIDE WHICH THE APPLICANT WAS ILLEGALLY AND UNCONSTITUTIONALLY REVERTED FROM THE POST OF ASSISTANT BS-16 (REGULAR) TO THE POST OF ASSISTANT BS-16 ON ACTING CHARGE BASIS

R/Sir,

Kindly reference to your letter No. DP/E&A/1(66)3618-63 Dated 10-03-2022.

Enclosed please find herewith an appeal petition by MR. Wasim Abbas posted as assistant in this office for further necessary actions and consideration please.

Encls: All relevant documents are attached for ready reference.

District Public Prosecutor
Dera Ismail Khan

Endst: No. & date even:

Copy forwarded for information to:

- The Regional Director Prosecution D.I.Khan Division D.I.Khan.

District Public Prosecutor
Dera Ismail Khan

To

The Honorable Secretary
Home Department
Govt: of Khyber Pakhtunkhwa,
Peshawar.

35

Subject:

APPEAL AGAINST THE IMPUGNED, ILLEGAL CORRIGENDUM ORDER NO. DP/E&A/1(66)3618-63 DATED 10-03-2022 VIDE WHICH THE APPELLANT WAS ILLEGALLY AND UNCONSTITUTIONALLY REVERTED FROM THE POST OF ASSISTANT BS-16 (REGULAR) TO THE POST OF ASSISTANT BS-16 ON ACTING CHARGE BASIS.

PRAYER:

On acceptance of this appeal, the impugned corrigendum order No.DP/E&A/1(66)3618-63 Dated 10-03-2022 issued by the worthy Director General prosecution Khyber Pakhtunkhwa may please be rescinded and set-aside and the appellant be retained as Assistant BS-16 on Regular Basis.

RESPECTFULLY SHEWETH!

1. That the appellant is currently posted as Office Assistant (BS-16) in the office of District Public Prosecutor D.I.Khan vide order No. DP/E&A /1(100)/2785-2810 dated 04.03.2021
2. That the appellant was initially appointed as Junior clerk in BS-07 in Directorate of Prosecution vide order DP/E&A /1(09)/091VOL-II 6696-6727 dated 30th October, 2009 of the Director General Prosecution, and thereupon the appellant arrived for duty and submitted his arrival report on 03.11.2009 to the worthy Director General Prosecution, Khyber Pakhtunkhwa Peshawar. (Annexure "A")
3. That the appellant was posted in the office of DPP D.I.Khan as junior clerk vide order No. DP/E&A /1(09)09/VOL-II 6696-6727 dated 30th October, 2009, whereon the petitioner/objector joined duty at the office of DPP D.I.Khan vide arrival report dated 03.11.2009. (Annexure "B")
4. That the appellant was promoted to the post of Senior Clerk BS-14 vide order No.DP/E&A/1(100)/1341-1420 dated 08.02.2016 and assumed the charge to the post of Senior Clerk in the office of DPP D.I.Khan dated 10.02.2016. (Annexure "D")
5. That the appellant was again promoted to the post of Assistant (BS-16) vide order No. DP/E&A/1(100)2785-2810 dated 04.03.2021 on the recommendation of Departmental promotion committee along with 16 other officials on Regular Basis and posted vide the same order as assistant BS-16 in the office of District Public Prosecutor D.I.Khan, and thereupon, the undersigned assumed the charge of Assistant in the office of DPP D.I.Khan on 05.03.2021. (Annexure "E")

6. That After promotion to the post of Assistant, a tentative seniority list of assistant BS-16 was formulated and communicated vide Deputy Director Administration letter No. DP/E&A/1(66)10750-90 dated 27-08-2021, wherein the appellant was placed on serial No.38. (Annexure "F")
7. That, astonishingly another illegal, unconstitutional and against the law and facts corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 was issued by the worthy Director General Prosecution, Khyber Pakhtunkhwa vide which the appellant and 13 others Assistants (BS-16) were reverted from Assistant (BS-16) Regular to Assistant (BS-16) on Acting Charge Basis, though the appellant and 16 other Assistants has successfully completed the period of probation but for the issuance of said impugned illegal corrigendum neither meeting of DSC was convened nor the approval of the competent authority was sought. (Annexure "G")
8. That due to the said impugned illegal corrigendum the appellant and 13 others were placed in the seniority list of Senior Clerks (BS-14), which seniority list has already been impugned and objected to by the appellant separately.
9. Aggrieved from the illegal, unconstitutional and irrational impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 issued by the worthy Director General Prosecution, Khyber Pakhtunkhwa, the appellant seeks to set-aside the said corrigendum inter alia on the following grounds.

GROUND:

- i. That the impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 is patently illegal, arbitrary, fanciful, perverse, unlawful and against the facts, hence liable to be set-aside.
- ii. That admittedly the objector has been promoted to the post of assistant BPS-16 vide order dated 04.03.2021 in a joint promotion order, wherein the objector is appearing at serial No.5, so how come in the seniority of assistants issued on 10.03.2022, his name is missing rather his name is appearing on the tentative list of senior clerks (BPS-14) at serial No.2 and in the column of remarks it has been mentioned that he has been appointed as assistant on acting charge base which entry is totally incorrect, rather the name of the objector should have been mentioned in the seniority list of assistants at serial No.35 prior to those five persons who have been directly appointed on 05.03.2021.
- iii. That as mentioned above the objector is not posted as senior clerk nor he has been given promotion to BPS-16 on acting charge base, as the order dated 04.03.2021 is very much clear that the objector along with 16 others have been promoted to the post of Assistant BPS-16 on regular basis, then why his name is not mentioned in the list of assistant rather he has been shown to be senior clerk BPS-14 and promoted to BPS -16 on acting charge base.

37

iv. That valuable rights of the objector are involved in the matter and as the seniority list issued on 10.03.2022 reached at DIKhan on 14.03.2022, as evident from the signature of Superintendent of DPP office, therefore, the same was handed over to the objector and he is preferring the instant objection petition / representation, well within time.

v. That the appellant was promoted on regular basis on the recommendation of Departmental Promotion Committee to the post of Assistant on regular basis and has served since then in the same post for more than a year, therefore, the probation period provided for the post was successfully completed and neither the appellant was reported by the reporting officer for incompetence nor for any misconduct, thus issuance of impugned corrigendum order No. No. DP/E&A/1(66)3618-63 dated 10-03-2022 for converting the regular promotion of the appellant to one on acting charge basis is not only arbitrary but also perverse and against the law and service rules of this province. Hence, the impugned corrigendum order may be struck down.


vi. That great injustice has been done with the appellant by issuing the impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022, whereby the regular promotion of the appellant has been converted illegally and unconstitutionally to one on acting charge basis, and by the operation of said impugned order, 05 Assistants BS-16 who were appointed through direct recruitment later in time to the promotion of the appellant were declared seniors to the appellant, the operation of said impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 is not only colorful exercise of authority but also against the norms of natural Justice and Service Laws and rules, hence the impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 is not sustainable.

vii. That other grounds may be agitated during personal hearing if opportunity provided.

It is, therefore, humbly prayed that the appeal in hand be accepted and the impugned corrigendum order No. DP/E&A/1(66)3618-63 dated 10-03-2022 may be please be rescinded and set-aside and the appellant be retained as Assistant BS-16 on Regular Basis.

Dated: 24-3-2022

Yours obediently,


WASIM ABBAS
ASSISTANT (BS-16)
O/O D.P.P, D.I.Khan



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**DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA**

No. DPF.011(66)3664-3709
Dated Peshawar 10/03/2022
Office Phone # 091-9212559
Fax # 091-9212559
E-mail kpprosecution@yahoo.com

To: All Regional Directors Prosecution/District Public Prosecutors,
In Khyber Pakhtunkhwa.
Attention: All Assistants (BPS-16) and Senior Clerks (BS-14).
Subject: - TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) & SENIOR
CLERK (BS-14).

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of Tentative Seniority List of Assistants (BS-16) and Senior Clerks (BS-14) of the Directorate of Prosecution, Khyber Pakhtunkhwa. The same may be handed over to all the concerned Officials working under your kind control for information and further necessary action.

Furthermore, it is directed to submit their objections, if any, to this Directorate for necessary action within 10- days positively, otherwise the same will be considered as "Final Seniority List", please.

Yours faithfully,

Deputy Director Administration

(Encl: as above)
Copy forwarded for information to the:

1. PA to Director General Prosecution, Khyber Pakhtunkhwa.

No 63
JA 15/3/2022

Deputy Director Administration

Noted Sir.
[Signature]

be circulated
in concerned
Staff.
[Signature]
15/03/2022

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TENTATIVE SENIORITY LIST OF OFFICE ASSISTANT BPS-16, IN DIRECTORATE OF PROSECUTION PESHAWAR Khyber Pakhtunkhwa, 2022

S. N O	Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post			Present Posting
					Date	BS	Method of Recruitment	
1.	Muhammad Hamayoon	B.A.	28/10/1967 Lakki Marwat	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, Orakzai
2.	Qamar Zaman	B.A.	20/01/1970 Tank	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, south Waziristan
3.	Muslim Khan	Matric	07/01/1966 Charsadda	26-07-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Peshawar
4.	Sikandar Hayat	Matric	15/11/1964 Dir Lower	15-08-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) on acting charge basis Office of the district public prosecutor, upper dir
5.	Muhammad Iqbal	B.Com	05/05/1970 Lakki Marwat	13-09-1989 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, Bannu
6.	Shahid Gul	Matric	05/05/1963 Kohat	19-09-2000 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis DPP Kurram.
7.	Mumraiz Khan	Matric	04/04/1970 Peshawar	19-09-2000 Naib Qasid BS-01	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Khyber
8.	Shakeel Akhtar	Matric	15/03/1977 Nowshera	17-04-1994 Assistant BS-16	11/02/2019	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis DPP Mohammad
9.	Syed Ibrar Shah	Matric	1976 Mansehra	10-03-2003 Naib Qasid BS-01	05/04/2019 11-2-2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Torghar

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S. N O	Name	Qualificati on	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post Present Posting			Present posting
					Date	BPS	Method of recruitment	
10.	Abdul Wahid	Matric	16/03/1972 Tank	10-03-2003 Junior Clerk BS-05	17/11/2017	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, tank
11.	Sakhawat Shah	B.A	10/04/1975 Buner	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, swat
12.	Muhammad Arshad	Matric	01/06/1977 Mansehra	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, batagram
13.	Malik Rehmat Ali	Matric	04/04/1981 Peshawar	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Khyber
14.	Muhammad Yousaf	B.A	24/04/1964 Bannu	24-04-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor , Bannu
15.	Aurangzeb	Matric	01/03/1963 Dir Lower	17-08-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,DIR LOWER
16.	Ajmal Khan	Matric	24/11/1967 Swabi	03-12-1989 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,SWABI
17.	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,Swabi
18.	Said Rehman	F.A	20/03/1974 Swat	26-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,SWAT
19.	Tariq Ahmad	Matric	03/04/1975 Swat	27-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,SWAT
20.	Syed Alam Shah	Matric	13/02/1974 Mansehra	15-03-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,Mansehra
21.	Hazrat Muhammad	B.A.	01/01/1970 Malakand	23-07-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,Malakand
22.	Jehan Alam	B.A.	07/03/1984 Shangla	12-04-2007 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,Shangla
23.	Ismail Khan	B.A	10-01-1982 MALAKAND	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at Office of the District Public Prosecutor, Charzadda
24.	Raisul Ahrar Bacha	B.S (Zoology)	05-07-1994 SWAT	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at DIRECTORATE OF PROSECUTION
25.	Saba Gul	B.S(BOTANY)	16-01-1995 MARDAN	24-06-2019 Assistant BS-16	24-06-2019	16	Appointed through KPPSC	Assistant (BS-16) at DPP OFFICE Nowshera
26.	Muhammad Ali Shah	LLB (Hons)	26-11-1989 Abbotabad	03-09-2019 Assistant BS-16	03-09-2019	16	Appointed through KPPSC	Assistant (BS-16) at District Public Prosecutor Abbotabad

3

3

S. N O	Name	Qualificati on	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post Present Posting			Present posting
					Date	BPS	Method of recruitment	
27.	Hanif-ur-Rehman	MA(Political Science)	01.03.1980 Bajaur	01.12.2004 Assistant BS-16	01.07.2019	16	Adjustment surplus pool	Gone to Benevolent Fund deptt on deputation
28.	Sadar Ayub	F.A	06/01/1985 UPPER KOHISTAN	12-04-2007 JUNIOR CLERK	12-04-2007	16	Promotion	Assistant(DS-16) at DPP OFFICE upper Kohistan
29.	Waheed Akhtar	D.COM	28/03/1987 KOHAT	12-04-2007 JUNIOR CLERK	12-04-2007	16	Promotion	Assistant(BS-16) at DPP OFFICE Kohat
30.	Fazle Rabi	MATR IC	19/01/1970 PESHAWAR	01-01-1992 NAIB QASID	01-01-1992	16	Promotion	Assistant(BS-16) at directorate of prosecution
31.	Raja Arshad	MATR IC	04/02/1974 ABBOTTABAD	30-11-1995 NAIB QASID	30-11-1995	16	Promotion	Assistant(BS-16) at DPP OFFICE Abbottabad
32.	Bashir Ahmad	Matric	05/06/1965 Chitral	12/05/1990 Junior Clerk BS-05	12/05/1990	16	Promotion	Assistant(BS-16) at DPP OFFICE Peshawar
33.	Muhammad Ashraf	Matric	03/04/1978 Peshawar	07-07-1997 Naib Qasid BS-01	07-07-1997	16	Promotion	Assistant(BS-16) at DPP OFFICE Bannu
34.	Shamshad Iqbal	Matric	01/06/1973 FR Bannu	01-04-2006 Junior Clerk BS-7	01-04-2006	16	Promotion	Assistant (BS-16) at DPP Office Peshawar
35.	Jalal Uddin	M.P hil	06-09-1990 Peshawar	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Assistant(BS-16) at DPP OFFICE Bannu
36.	Mubashir Dilawar	LLB	28-2-1990 Karak	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Assistant (BS-16) at DPP Office Peshawar
37.	Amjid Khan	MSc	8-3-1992 Peshawar	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Assistant (BS-16) at DPP Office South Waziristan
38.	Hanif Ullah	MS	1-11-1994 Bajaur	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Assistant (BS-16) at DPP Office Orakzai
39.	Haq Nawaz	MA	4-4-1985 Malakand	5-03-2021 Assistant (BPS-16)	5-03-2021	16	Initial	Assistant (BS-16) at DPP Office Kurram
								Assistant (BS-16) at DPP Office Hangu


 Director Administration
 Directorate of Prosecution
 Khyber Pakhtunkhwa

74

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**TENTATIVE SENIORITY LIST OF SENIOR CLERKS (BPS-14), IN DIRECTORATE OF PROSECUTION, KHYBER
PAKHTUNKHWA 2022**

S.No	Name	Qualification	Date of Birth & Domicile	Date of first entry into service with designation & BPS	Present Posting
1.	Tariq Khan	B.A. LLB	01/04/1984 Charsadda	30-10-2009 Junior Clerk BS-7	Appointed as Assistant(BS-16) On Acting Charge Basis, Lakki Marwat
2.	Wasem Abbas	M.A.	05/02/1986 D.I.Khan	30-10-2009 Junior Clerk BS-7	Appointed as Assistant(BS-16) On Acting Charge Basis) at D.I.Khan
3.	Shah Fahad	B.A	31/12/1988 Mardan	05-01-2009 Junior Clerk BS-7	Appointed as Assistant(BS-16) On Acting Charge Basis at Mardan
4.	Shah Zeb	F.A	17/01/1989 Mardan	30-10-2009 Junior Clerk BS-7	Appointed as Assistant(BS-16) On Acting Charge Basis DOP
5.	Bakht Pervesh	B.A.	11/04/1973 Buner	23-12-2003 Naib Qasid BS-1	Appointed as Assistant(BS-16) On Acting Charge Basis DOP
6.	Wali-ur-rehman	B.A	12/06/1973 Manshra	23-12-2003 NAIB QASID Bs-1	Appointed as Assistant(BS-16) On Acting Charge Basis at Manshra
7.	Nasir Ali	Matric	08/02/1974 Swat	23-12-2003 Naib Qasid BS-1	Appointed as Assistant(BS-16) On Acting Charge Basis at Dir Upper
8.	Jamshed Ahmad	Matric	06/01/1976 Lower Chitral	23-12-2003 Naib Qasid BS-1	Appointed as Assistant(BS-16) On Acting Charge Basis at Upper Chitral
9.	Muhammad Zarshad	Matric	18/05/1978 Swabi	23-12-2003 Naib Qasid BS-1	Appointed as Assistant(BS-16) On Acting Charge Basis DOP
10.	Muhammad Tariq Khan	DAE/BA.	15/03/1991 Lakki Marwat	14-02-2014 Junior Clerk BS-07	Appointed as Assistant(BS-16) On Acting Charge Basis at Lakki Marwat
11.	Taj Rehman	M.A.	24/03/1986 Buner	03-09-2012 Naib Qasid ✓	Appointed as Assistant(BS-16) On Acting Charge Basis at Buner ✓
12.	Tufail Khan	M.A.	26/12/1992 Mardan	14-02-2014 Junior Clerk BS-07	Appointed as Assistant(BS-16) On Acting Charge Basis at Mardan
13.	Muhammad Nasir	B.Com	30/10/1993 Peshawar	14-02-2014 Junior Clerk BS-07	Appointed as Assistant(BS-16) On Acting Charge Basis DOP
14.	Noman	M.A	26/06/1986 Swat	14-02-2014 Junior Clerk BS-07	Appointed as Assistant(BS-16) On Acting Charge Basis at Bajaur
15.	Akhtar Hussain	M.A.	12/04/1984 Swat	30-10-2009 Junior Clerk BS-07	Senior Clerk Office of DPP Office Swat

(43)


S.No	Name	Qualification	Date of Birth & Domicile	Date of first entry into service with designation & BPS	Present Posting
16.	Said Nawaz	Matric	12/12/1978 Buner	23-12-2003 Junior Clerk BS-07	Senior Clerk Office of DPP Office Buner
17.	Roman Mehmood Khan	B.A & LLB	09-07-1991 BANNU	02-05-2017 Junior Clerk BS-11	Senior Clerk Office of DPP Office Directorate of prosecution
18.	OSAMA	FSC	21-09-1996 Pesh	02-05-2017 Junior Clerk BS-11	Senior Clerk Office of DPP Office Directorate of prosecution
19.	Muhammad Arif	Matric	12-03-1962 Abbottabad	04-02-1993 Junior Clerk BS-11	Senior Clerk Office of DPP Office Abbottabad
20.	Imran Khan	Matric	27-07-1979 Malakand	23-12-2003 Naib Qasid BS-01	Senior Clerk Office of DPP Office Malakand
21.	Muhammad Yahya	B.A.	15-09-1979 Lower Chitral	23-12-2003 Naib Qasid BS-01	Senior Clerk Office of DPP Office Lower Chitral
22.	Haider Ali	F.A.	1-01-1980 Swat	23-12-2003 Naib Qasid BS-01	Senior Clerk Office of RD Office SWAT
23.	Subhanullah	Matric	18-05-1982 Dir Lower	23-12-2003 Naib Qasid BS-01	Senior Clerk Office of DPP Office BAJOUR
24.	Umer Ayaz	FA	15-08-1983 Karak	23-12-2003 Naib Qasid BS-01	Senior Clerk Office of DPP Office Bannu
25.	Asghar Ali	B.A.	5-01-1986 Dir Lower	23-12-2003 Naib Qasid BS-01	Senior Clerk Office of DPP Office Mohmand
26.	Asfandyar Gul	F.A.	4-04-1978 Dir Upper	24-02-2004 Naib Qasid BS-01	Senior Clerk Office of DPP Office Dir Upper
27.	Farmanullah	B.A.	7-07-1979 Malakand	25-02-2004 Naib Qasid BS-01	Senior Clerk Office of DPP Office Malakand
28.	Fazal Haq	Matric	8-03-1982 Karak	24-07-2004 Naib Qasid BS-01	Senior Clerk Office of DPP Office Karak
29.	Syed Pir Hussain Shah	Matric	11-01-1981 Manshra	16-08-2004 Naib Qasid BS-01	Senior Clerk Office of DPP Office Manshra
30.	Abdul Fahim	F.A.	4-04-1976 Kohat	1-10-2005 Chowkidar BS-01	Senior Clerk Office of DPP Office, Kurram
31.	Hasan Shah	Matric	1-02-1980 Peshawar	1-10-2005 Chowkidar BS-01	Senior Clerk Office of DPP Office Directorate of Prosecution
32.	Muhammad Ilyas	Matric	02-1985 Hangu	2-10-2005 Chowkidar BS-01	Senior Clerk Office of DPP Office Hangu

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54

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S.No	Name	Qualification	Date of Birth & Domicile	Date of first entry into service with designation & BPS	Present Posting
33.	Amjad Ali	Matric	21-03-1987Swat	8-10-2005 Chowkidar BS-01	Senior Clerk Office of DPP Office SWAT
34.	Zar Ali Khan	Matric	15-09-1976 Peshawar	15-10-2005 Chowkidar BS-01	Senior Clerk Office of DPP Office Khyber
35.	Ayaz Khan	Matric	12-01-1981 Peshawar	05-03-2020 Chowkidar BS-01	Senior Clerk Office of DPP Office Peshawar
36.	Tahir Jayed	Matric	16-03-1982 Karak	21-10-2005 Sweeper BS-01	Senior Clerk Office of RD Office Bannu
37.	Saeed ullah	Matric	6-01-1974 Dir Lower	25-10-2005 Sweeper BS-01	Senior Clerk Office of DPP Office Dir Lower
38.	Salamuddin	B.A.	1-05-1970 Shangla	28-10-2005 Chowkidar BS-01	Senior Clerk Office of DPP Office Shangla


Director Administration
Directorate of Prosecution

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Subject: **MINUTES OF THE MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE (DPC) REGARDING PROMOTION OF SENIOR CLERKS (BPS-14) TO THE POSTS OF ASSISTANT (BPS-16).**

A meeting of the Departmental Promotion Committee (DPC) was held on 10-02-2021 at 11:00 AM under the chairmanship of Secretary, Home and Tribal Affairs Department in his office. The following attended the meeting: -

1. Mr. Ikramullah Khan (Chairman)
Secretary, Home & Tribal Affairs Department.
2. Mr. Umar Nawaz (Secretary)
Deputy Secretary (Judicial), Home & Tribal Affairs Department.
3. Mr. Muhammad Ismail (Member)
Section Officer (R-II), Establishment Department.
4. Mr. Muhammad Ilyas (Member)
Section Officer (SR-II), Finance Department.
5. Mr. Zia Ul Qamar Safi (Member)
Deputy Director Administration
Directorate of Prosecution, Khyber Pakhtunkhwa.

The meeting commenced with the recitation from the Holy Quran. Thereafter, the chair welcomed the participants. Deputy Secretary Judicial, Home & Tribal Affairs Department apprised the committee that there are (17) vacant posts (15 clear+02 resultant) of Assistant (BS-16) falling under the promotion quota in the Directorate of Prosecution and District Prosecution offices. He added that according to Khyber Pakhtunkhwa, Prosecution Service Rules, 2010 as amended in 2019, the method of promotion of the Assistant (BS-16) has been prescribed as below:

i) 25% by initial recruitment.

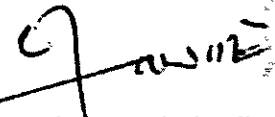
ii) 75% by promotion on the basis of seniority-cum-fitness from amongst the Senior Clerks with at least five years' service as Senior Clerk and Junior Clerk.

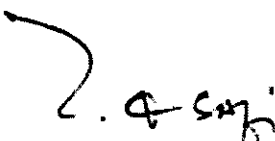
Therefore, 17 Senior Clerks (BS-14) are required to be promoted as Assistant (BS-16). Keeping in view vacant posts and provision of the Rules ibid, the committee considered the panel of Senior Clerks (BS-14) as per notified seniority list and recommended the following Senior Clerks for promotion to the post of Assistant (BS-16) at Serial 1 to 19 on regular basis, however, the official reflected at Serial No.5 has to be superseded on his own request while the official reflected at Serial No.16 has not been considered as he opted to be promoted to the post of Assistant Accountant(BS-16):-

S.#.	Name of Official	DECISION OF DEPARTMENTAL PROMOTION COMMITTEE
1.	Bashir Ahmad	Recommended for promotion on Regular basis.


2.	Muhammad Ashraf	-do-
3	Shamshad Iqbal	-do-
4	Tariq Khan	-do-
5	Akhtar Hussain	Superseded for promotion as he has requested to forgo his promotion.
6	Waseem Abbas	Recommended for promotion on Regular Basis
7	Shah Fahad	-do-
8	Shah Zeb	-do-
9	Bakht Pervesh	-do-
10	Wali Ur Rehman	-do-
11	Nasir Ali	-do-
12	Jamshed Ahmad	-do-
13	Muhammad Zarshad	-do-
14	Muhammad Tariq Khan	-do-
15	Taj Rehman	-do-
16	Ammad Amir	Not recommended for promotion as he has opted to be promoted to the post of Assistant Accountant (BS-16)
17	Tufall Khan	Recommended for promotion on Regular Basis
18	Muhammad Nasir	-do-
19	Noman	-do-


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


 Deputy Secretary (Judicial)
 Home & Tribal Affairs Department
 Member/Secretary of DPC


 Deputy Director Prosecution
 Directorate of Prosecution
 Khyber Pakhtunkhwa
 Member

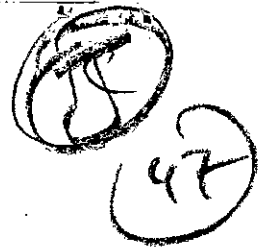

 Deputy Secretary (R-II)
 Establishment Department
 Member


 Section Officer (SR-II)
 Establishment Department
 Member


 Secretary
 Home & Tribal Affairs Department
 Khyber Pakhtunkhwa

**DIRECTORATE OF PROSECUTION**

KHYBER PAKHTUNKHWA
No. DP
Dated Peshawar 06th March 2021
Office Phone # 091-9212660/091-9212643
Fax # 091-9212660
E-mail: kprosecution@yahoo.com

**ORDER:**

No. DP/PA/1(93907-15) :- On the recommendations of Departmental Selection Committee (D.S.C), the following candidates are hereby appointed as Assistant (BS-16) against the vacant posts in the Directorate of Prosecution in the public interest:-

S.No	Name	Father Name	Merit/Zone
1	Mr. Jalal Ud Din	Fateh Muhammad	Merit Quota
2	Muhammad Waqar Khan	Fazli Moulvi	Merit Quota
3	Mr. Hunif Ullah	Jehangir Khan	Zone-I Quota
4	Mr. Amjad Khan	Ameer Khan	Zone-II Quota
5	Mr. Haq Nawaz	Abdul Hameed	Zone-III Quota
6	Mr. Mubashar Dilawar	Dilawar Khan	Zone-IV Quota

THEIR APPOINTMENT SHALL BE SUBJECT TO THE FOLLOWING TERMS AND CONDITIONS:

1. Their Services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Khyber Pakhtunkhwa Prosecution Service and the rules made there under.
2. They will get pay at the minimum of BS-16 including usual allowances as admissible under the Rules. They shall also be entitled to annual increment as per existing policy.
3. They will be initially, on probation for a period of one year extendable for a further period of one year.
4. In case any one wishes to resign at any time, fourteen days (14) prior notice shall be necessary or in lieu thereof fourteen days (14) pay shall be forfeited.
5. They will produce a medical certificate of fitness from Medical Superintendent of District Headquarter Hospital concerned and character certificate from two Gazetted Officers.
6. Their appointment is subject to satisfactory verification of the antecedents by police, domicile certificate, testimonials by the concerned authorities/officers.
7. Their appointment is liable to be terminated at any time without assigning any reason before the expiry of the period of probation/extended period of probation, if their performance during this period is not found satisfactory.
8. They shall join duty at their own expenses and NO TA/DA shall be admissible
9. If the offer of appointment is acceptable to them on above conditions, they should report for duty to the Directorate of Prosecution within 15 days of the issuance of this order.

-sd-

Director General Prosecution
Khyber Pakhtunkhwa

Endst. of Even No. & Date:

Copy forwarded for information to the:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar
2. PS to Secretary to Government of Khyber Pakhtunkhwa, Home & Tribal Affairs Department
3. Assistant Director IT, Directorate of Prosecution.
4. Official Concerned.
5. PA to Director General Prosecution, Khyber Pakhtunkhwa
6. Official Concerned.

Director Administration

(48)



DIRECTORATE OF PROSECUTION

KHYBER PAKHTUNKHWA

No. DP-

Dated Peshawar / 17 / 2022

Office Phone # 091 4212529, 091 4212542

Fax # 091 4212542

E-mail: kpprosecution@kpn.gov.pk

ORDER:

No. DP/25A/

On the recommendations of Departmental Selection Committee (D.S.C.) ~~Muhammad Ali~~ ~~Abdul~~ ~~Amir~~ ~~Nawas~~ is hereby appointed as Assistant (BS-16) from Zone-I (quota) against the vacant post in the Directorate of Prosecution in the public interest.

HIS APPOINTMENT SHALL BE SUBJECT TO THE FOLLOWING TERMS AND CONDITIONS:

1. His Services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Khyber Pakhtunkhwa Prosecution Service and the rules made there under.
2. He will get pay at the minimum of BS-16 including usual allowances as admissible under the Rules. He shall also be entitled to annual increment as per existing policy.
3. He will be initially, on probation for a period of one year extendable for a further period of one year.
4. In case he wishes to resign at any time, fourteen days (14) prior notice shall be necessary or in lieu thereof fourteen days (14) pay shall be forfeited
5. He will produce a medical certificate of fitness from Medical Superintendent of District Headquarter Hospital concerned and character certificate from two Gazetted Officers.
6. His appointment is subject to satisfactory verification of the antecedents by police, domicile certificate, testimonials by the concerned authorities/officers.
7. His appointment is liable to be terminated at any time without assigning any reason before the expiry of the period of probation/extended period of probation, if his performance during this period is not found satisfactory.
8. He shall join duty at his own expenses and NO TA/DA shall be admissible
9. If the offer of appointment is acceptable to him on above conditions, he should report for duty to the Directorate of Prosecution within 15 days of the issuance of this order.

-sd-

Director General Prosecution
Khyber Pakhtunkhwa

Endst: of Even No. & Date:

Copy forwarded for information to the:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar
2. PS to Secretary to Government of Khyber Pakhtunkhwa, Home & Tribal Affairs Department
3. Assistant Director IT, Directorate of Prosecution.
4. PA to Director General Prosecution, Khyber Pakhtunkhwa
5. Official Concerned.

Deputy Director Administration

Director General Prosecution
Khyber Pakhtunkhwa

DIRECTORATE OF PROSECUTION

KHYBER PAKHTUNKHWA

No. DP-

Dated Peshawar/21/05/2022

Office Phone # 091-9212559/ 091-9212543

Fax # 091-9212559

E-mail: prosecution@yahoo.com



ORDER:

No. DP/E&A/119/7631-35

:- On the recommendations of Departmental Selection Committee (D.S.C.), **Mrs Mohsan Shakeel s/o Shakeel Ahmad** is hereby appointed as Assistant (BS-16) from Zone-V (quota) against the vacant post in the Directorate of Prosecution in the public interest:-

THIS APPOINTMENT SHALL BE SUBJECT TO THE FOLLOWING TERMS AND CONDITIONS:

1. His Services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Khyber Pakhtunkhwa Prosecution Service and the rules made there under.
2. He will get pay at the minimum of BS-16 including usual allowances as admissible under the Rules. He shall also be entitled to an usual increment as per existing policy.
3. He will be initially, on probation for a period of one year extendable for a further period of one year.
4. If he wishes to resign at any time, fourteen days (14) prior notice shall be necessary or in lieu thereof fourteen days (14) pay shall be forfeited.
5. He will produce a medical certificate of fitness from Medical Superintendent of District Headquarter Hospital concerned and character certificate from two Gazetted Officers.
6. His appointment is subject to satisfactory verification of the antecedents by police, domicile certificate, testimonials by the concerned authorities/officers.
7. His appointment is liable to be terminated at any time without assigning any reason before the expiry of the period of probation/extended period of probation, if his performance during this period is not found satisfactory.
8. He shall travel at his own expenses and NO TA/DA shall be admissible.
9. If the appointment is acceptable to him on above conditions, he should report for duty to the Directorate of Prosecution within 15 days of the issuance of this order.

-sd-

Director General Prosecution
Khyber Pakhtunkhwa

List of Even No. & Date:

Copy forwarded for information to the:-
1. Director General, Khyber Pakhtunkhwa, Peshawar
2. Secretary, Government of Khyber Pakhtunkhwa, Home & Tribal Affairs

3. Director IT, Directorate of Prosecution
4. Director General Prosecution Khyber Pakhtunkhwa
5. For file.

Deputy Director Administration



Service Rules

80

**DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA**

No. DP/FA/1(73)13408-58

Dated Peshawar 16/12/2019

Office Phone # 091-9212559

Fax # 091-9212559

E-mail kp prosecution@yahoo.com

To:

All Regional Directors Prosecution,
Khyber Pakhtunkhwa.

All District Public Prosecutors,
Khyber Pakhtunkhwa.

Section Officer (Prosecution),
Home & Tribal Affairs, Department
Khyber Pakhtunkhwa, Peshawar.

Subject: - CONSOLIDATE PROSECUTION SERVICE RULES.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith notification No. Dated: 26-08-2010 alongwith consolidated Prosecution Service Rules for information and further necessary action, please.

Yours faithfully,

[Signature]
Deputy Director Administration

(Encl: as above)

Copy forwarded for information to the:-

1. All sections of this Directorate.
2. PA to Director General Prosecution Khyber Pakhtunkhwa.
3. Office record.

[Signature]
Deputy Director Administration

Sam

With

23.12.19

81

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT**

CONSOLIDATED PROSECUTION SERVICE RULES

NOTIFICATION

Dated 06th August 2010

PROSECUTION SERVICE RULES

No. SO (Prosecution)/HD/1-5/2005/Vol-II. In pursuance of the provision contained in sub rule-2 of rule-3 of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules, 1989 and in supersession of all previous rules in this behalf the Home & Tribal Affairs Department hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 6 of the Appendix to this Notification which shall be applicable to the posts borne in the Directorate of Prosecution, Khyber Pakhtunkhwa specified in column 2 of the said Appendix.

(Faz Ahmad Khan Toru)
Additional Chief Secretary Home
Khyber Pakhtunkhwa
Province

Endst: No & Date even.

Copy forwarded to:-

1. The Secretary Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
2. The Director General Prosecution, Khyber Pakhtunkhwa, Peshawar.
3. All the District Public Prosecutors in Khyber Pakhtunkhwa.

(Usman Zaman)
Section Officer (Prosecution)

409 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY 16th February 2018

O.	NOMENCLATURE	SCALE	MINIMUM QUALIFICATION	METHOD OF APPOINTMENT.	Age Limit.
	Director General Prosecution ¹	20		By transfer from amongst the officers of PCS/PMS/PAS. ²	
1A	Regional Director	20		By promotion, on the basis of merit-cum-fitness, from amongst the Senior Public Prosecutors, District Public Prosecutors and Directors in (BPS-19) with at least seventeen (17) years of service in BPS-17 and above subject to successful completion of Senior Management Course ³	
2	Senior Public Prosecutor (BS-19)/ District Public Prosecutor (BS-19) ⁴	19		By promotion, on the basis of seniority-cum-fitness from amongst the Deputy Public Prosecutors (BPS-18) with at least twelve (12) years of service in BPS-17 and above.	
3	Direct-Legal (BS-19) / Director Admin (BS-19)/ Director Monitoring (BS-19) ⁵	19		By transfer, from amongst the Senior Public Prosecutors and District Public prosecutor (BS-19). ⁶	
4	Deputy Public Prosecutor (BS-18)	18		By promotion on the basis of seniority-cum-fitness, from amongst the Assistant Public Prosecutor (BS-17) with at least five (05) years of service as such ⁷	

² Substituted vide Notification No.SO (Prosecution)/HD/1-5/VOI-I/2018 dated 18th January, 2018.

³ Substituted vide Notification No.SO (Prosecution)/HD/1-5/VOI-I/2018 dated 18th January, 2018.

⁴ Substituted vide Notification No.SO (Prosecution)/HD/1-5/2005/Vol: II dated 6th August, 2010.

⁵ Substituted vide Notification No.SO (Prosecution)/HD/1-5/VOI-I/2018 dated 18th January, 2018.

⁶ Substituted vide Notification No.SO (Prosecution)/HD/1-9/2012/VOI-I/ dated 05 September, 2013.

⁷ Substituted vide Notification No.SO (Prosecution)/HD/1-5/VOI-I/2018 dated 18th January, 2018.

⁸ Substituted vide Notification No.SO (Prosecution)/HD/1-5/VOI-I/2018 dated 18th January, 2018.

53

	Assistant Public Prosecutor (BS-17)8	17	i. at least Second Class LLB/BS(Law)Honors/BS (Shariah Law) Honors(five years) or its equivalent qualification, from a recognized University; and ii. License from Bar Council	By initial recruitment	25-35
"5A	Assistant Director (IT) (BS-17)9	17	-	By promotion, on the basis of seniority-cum-fitness from amongst the Computer Operators with five-years' service as such, having the following qualification: (i) 2 nd Class Bachelor's Degree in Computer Science/Information Technology (BCS/BIT four years) or its equivalent qualification from a recognized university; or (ii) 2 nd Class Bachelor's Degree from a recognized university with one year Diploma in information Technology from a recognized Board of Technical Education;	
6	Librarian (BPS-16)	16	Bachelor's Degree in at least 2 nd division or equivalent qualification from a recognized University. ii) Diploma in Library Science	By initial recruitment	23-32
7	Superintendent (BPS-17)10	17		By promotion on the basis of seniority-cum-fitness from amongst the Assistants with at least five years' service as such;	
7A	Assistant Accountant(BPS-16)12	16		By promotion on the basis of seniority-cum-fitness, from amongst Senior Clerks with five (05) years' Service as Junior Clerk and Senior Clerk having Bachelors of Commerce Degree (B.Com) from a recognized University;	
8	Assistant (BPS-16)13	16	Bachelor's degrees from a recognized University	a. 75% by promotion on the basis of seniority-cum-fitness from amongst senior clerks with at least five years' service as Senior Clerk and Junior Clerks and; b. 25% by initial recruitment.	18-30 years.

Substituted vide Notification No. SO (Prosecution)/HD/1-5/VOL-1/2018 dated 18th January, 2018.

Substituted vide Notification No. SO (Prosecution)/HD/1-5/Rules/2018 dated 21st March, 2018

Substituted vide Notification No. SO (Prosecution)/HD/1-9/2012/Vol-1 dated 05th March, 2013

Inserted vide Notification No. SO (Prosecution)/HD/1-5/2019 dated 2th October, 2019

Substituted vide Notification No. SO (Prosecution)/HD/1-5/Rules/ 2018 dated 21st March, 2018

59

	Assistant Public Prosecutor (BS-17)8	17	i. at least Second Class LLB/BS(Law)Honors/BS (Shariah Law) Honors(five years) or its equivalent qualification, from a recognized University; and ii. License from Bar Council	By initial recruitment	25-35
5A	Assistant Director (IT) (BS-17)9	17		By promotion on the basis of seniority-cum-fitness from amongst the Computer Operators with five years' service as such, having the following qualification: (i) 2 nd Class Bachelor's Degree in Computer Science/Information Technology (BCS/BIT four years) or its equivalent qualification from a recognized university; or (ii) 2 nd Class Bachelor's Degree from a recognized university with one year Diploma in information Technology from a recognized Board of Technical Education;	
6	Librarian (BPS-16)	16	Bachelor's Degree in at least 2 nd division or equivalent qualification from a recognized University. ii) Diploma in Library Science	By initial recruitment	23-32
7	Superintendent (BPS-17)10	17		By promotion on the basis of seniority-cum-fitness from amongst the Assistants with at least five years' service as such;	
7A	Assistant Accountant(BPS-16)12	16		By promotion on the basis of seniority-cum-fitness, from amongst Senior Clerks with five (05) years' Service as Junior Clerk and senior Clerk having Bachelors of Commerce Degree (B.Com) from a recognized University;	
8	Assistant (BPS-16)13	16	Bachelor's degrees from a recognized University.	a. 75% by promotion on the basis of seniority-cum-fitness from amongst senior clerks with at least five years' service as Senior Clerk and Junior Clerks and; b. 25% by initial recruitment.	18-30 years.

Substituted vide Notification No.SO (Prosecution).HD/1-5/VOL-1/2018 dated 18th January, 2018.
 Substituted vide Notification No.SO (Prosecution)/HD/1-5/Rules/2018 dated 21st March, 2018
 Substituted vide Notification No.SO (Prosecution)/HD/1-9/2012/Vol-I dated 05th March, 2013
 Inserted vide Notification No.SO (Prosecution)/HD/1-5/2019 dated 2th October, 2019
 Substituted vide Notification No.SO (Prosecution)/HD/1-5/Rules/ 2018 dated 21st March, 2018

	Senior Clerk (BPS-14) ¹⁷	14		By promotion on the basis of seniority-cum-fitness from amongst the Junior Clerks with at least two years' service as such	
	Junior Clerk (BPS-11) ¹⁸	11	i) Secondary School Certificate or equivalent from a recognized Board and ii) A speed of 30 words per minute in typing	a) 67% by initial Recruitment. b) 33% by promotion, on the basis of seniority-cum-fitness from amongst the Naib Qasid, Chowkidars & other employees in equivalent scales in the Department with at least two years' service as such having passed Secondary School Certificate"; and ¹⁹	18 to 30 Years,"; and
14	Naib Qasid ^{20 21}	03	Middle standard	a) Fifty (50) per cent by initial Recruitment. b) Fifty (50) per cent by transfer from other eligible Class IV i.e. Chowkidars & Sweepers.	18-40 Years
15	Driver ²²	06	Middle standard having valid LTV driving license and three years' experience	By initial recruitment	18-40 Years
16	Chowkidar ²³	03	Literate	By initial recruitment	18-40 Years
17	Sweeper ²⁴	03	Literate	By initial recruitment	18-40 Years

Note: For the purpose of promotion to the post of Junior Clerk, there shall be maintained a common seniority lists of Naib Qasids, Chowkidar and other employees in equivalent scales in the Department with reference to the dates of their acquiring the Secondary School Certificate provided that: -

- i. If two or more officials have acquired the SSC in the same session, the official having long service shall rank senior to other officials.
- ii. Where a senior official does not possess the requisite experience at the time of filling up a vacancy the officials next junior to him possessing the requisite experience shall be promoted in reference of the senior or officials.

⁸ Substituted vide Notification No.SO (Prosecution)/HD/1-5/Rules/2018 dated 21st March, 2018.

⁹ Substituted vide Notification No.SO (Prosecution)/HD/1-5/2019 dated 2nd October, 2019.

¹⁰ Substituted vide Notification No.SO (Prosecution)/HD/1-3/Rules/2018 dated 21st March, 2018.

¹¹ Substituted vide Notification No.SO (Prosecution)/HD/1-3/2019 dated 2nd October, 2019.

¹² Substituted vide Notification No.SO (Prosecution)/HD/1-5/Rules/2018 dated 21st March, 2018.

¹³ Substituted vide Notification No.SO (Prosecution)/HD/1-5/Rules/2018 dated 21st March, 2018.

¹⁴ Substituted vide Notification No.SO (Prosecution)/HD/1-5/Rules/2018 dated 21st March, 2018.

3. Office

Deputy Director

PAKISTAN BAR COUNCIL

59

Non Transferable
 In the event of joining or carrying on any other profession, business, service or vocation, the holder will not be entitled to use this Card and shall forthwith surrender it to The Pakistan Bar Council.

Name: **MR. SALEEM ULLAH KHAN RANA ZAI**
 Father's Name: **HABIB ULLAH KHAN**
 Dated: **10-5-1968**
 Date of Enrolment as Advocate of Supreme Court: **3-6-2001**
 Enrolment No.: **2053** Ref No: **10/PBC/Kpk/J.D**
 Address: **SHADRI TOWN, D.D. KHAN**

MR. SALEEM ULLAH KHAN RANA ZAI
 Advocate
 Supreme Court of Pakistan (ASC)

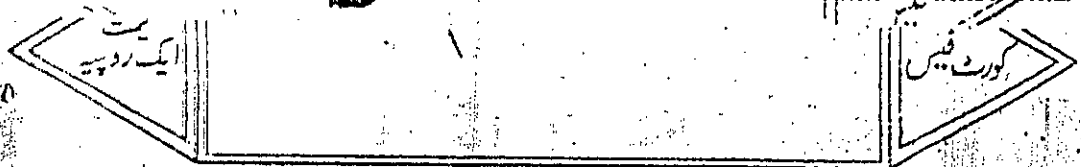


Asif ul Faiz
 Chairman
 Enrolment Committee

Date of Issue: 10-4-2010
 (Muhammad Arshad) Secretary Pakistan Bar Council

Tel: Off: 0032-466-714267 Res: 0032-466-73444 Call: 0332-8169803

If found please return to
 PAKISTAN BAR COUNCIL,
 Supreme Court Building, Constitution Avenue, Islamabad.
 Tel No. 0032-61-220805 Fax No. 0032-51-006922



Before the Service Tribunal, KPK, Peshawar جناب عدالت
 Appellant مہجانب
 Wasim Abbas بنام Govt. KPK etc

دعوی یا جرم

Service Appeal u/s 4 تفصیل دعوی یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا والا عنوان میں اپنی طرف واسطے پوری وجوہات ہی برائے پیشی یا تفتیق مقدمہ بمقام D.I. Khan کیلئے
Saleem Ullah Khan Ranazai D.Sc

کو حسب ذیل شرائط پر، کل انٹرویو کیا، کہ میں برٹری پر خود بذریعہ مختار خاص روزگار امداد حاضر ہونا ہوں گا۔ اور بر وقت ہاوتے جانے مقدمہ تک صاحب مہر دولت کا اطلاق دیکھ کر عدالت کروں گا۔ اگر پیشی پر سٹیبل مناسرت ہوا۔ اور مقدمہ میری میر معافی کی وجہ سے کسی طور پر میرے بر خلاف ہو گیا۔ تو صاحب مہر دولت کے لئے کسی طرح ڈسٹوریٹ ہونے کے لئے، نیز اکیل صاحب مہر دولت صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا جیکے یا بروڈ فٹنل میں ہری کر کے کے لئے وارنٹ ہونے کے لئے نیز دیکھ صاحب مہر دولت صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا جیکے یا بروڈ فٹنل میں ہری کر کے کے لئے وارنٹ ہونے کے لئے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سمیت ہونے یا بروڈ فٹنل یا کچہری کے اوقات سے آگے کے لئے پیش ہونے پر سٹیبل کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کر کے یا مکالمہ دہاں کر کے کے بھی مہر دولت ڈسٹوریٹ ہونے کے لئے۔ جھوٹا کوئل مرافعت پر داخل صاحب مہر دولت حمل کر کے ذات خرد و شکور و لٹول ہوگا۔ اور صاحب مہر دولت کو عرضی دعویٰ یا جواب دعویٰ یا درخواست اجراءے ذمہ داری و نظر ثانی اپنی گرائی اور ہم درخواست پر دخل و تصرف کرنے کا یہی اختیار ہوگا۔ اور کسی قسم یا ذکر کے لئے اور ہم کو روپہ وصول کرنے اور مزید دینے اور نال کرنے اور ہم کو دینے اور ہم کو برائش یا راشی یا جسہ فیصلے کے حلف کر کے، اقبال دعویٰ کا یہی اختیار ہوگا۔ اور اس صورت مقرر ہونے تاریخ پیش مقدمہ مذکورہ دونوں ان کچہری صدر ہری مقدمہ مذکورہ تفریق داری و لٹول و لٹول کے آگے مقدمہ یا پیشی کی طرف یا درخواست تم اختتامی یا قری یا کر لاری لٹل از فیصلہ اجراءے ذکر کے بھی صاحب مہر دولت کو بشرط انٹرویو فیصلہ ہری یا اختیار ہوگا اور ہم سامنے پروا خدہ صاحب مہر دولت لٹل کر کے ذات خرد و شکور و لٹول ہوگا۔ اور اس صورت ضرورت صاحب مہر دولت کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جز کی کاروائی یا اس صورت درخواست نظر ثانی اپنی یا گرائی یا دیگر مسائل مقدمہ مذکورہ کسی دوسرے دیکھ یا میرے سزا گاہے مجھے یا اپنے ہمراہ سزا کر کے۔ اور ایسے سزا گاہوں کو بھی جہز اس میں وہی اور دینے مقتضیات حاصل ہوں گے۔ جیسے صاحب مہر دولت کو حاصل ہیں، اور وہ دینے مقدمہ میں جو کہ ہر حالت الزام پر ہوگا، وہ صاحب مہر دولت کا حق ہوگا۔ مگر صاحب مہر دولت کو ہری پیشی یا پیشی سے پہلے امان کروں گا۔ تو صاحب مہر دولت کو یہ اختیار ہوگا کہ وہ مقدمہ کی جہز دینے کر کے اور اس کی صورت میں میرا کوئی مطالبہ کسی صاحب مہر دولت کے بر خلاف نہیں ہوگا۔

مورد 4 July 2012

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور مشکور ہے۔

لہذا وکالت نامہ گنوہا ہے نہ ہا کہ مسترد ہے

القلم العبد العبد العبد

Accepted
 Saleem Ullah Khan
 ASJ

Wasim Abbas
 Appellant

KHYBER PAKHTUNKHWA BAR COUNCIL



FAYYAZ HUSSAIN



Secretary's Signature

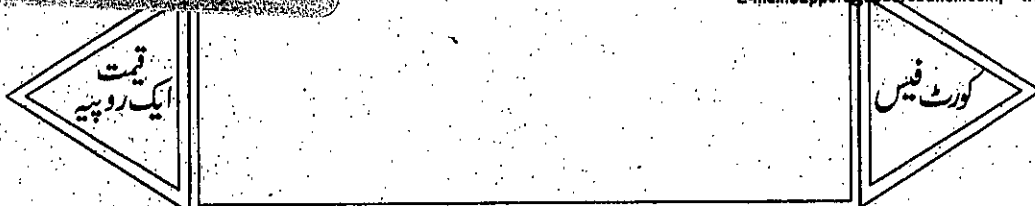
Father's Name: IJAZ HUSSAIN
Address: BASTI-DIWALA, HUSSAJNI CHOWK DERA ISMAIL KHAN.

Office Tel. 0988-714287, 0344-4424131, 0333-9983432
Enrolment Date L.C 30-06-2005
Enrolment Date H.C 03-07-2008
Place of Practice DERA ISMAIL KHAN.
Date of Birth 08-02-1980
Blood Group O+VE
N.I. No. 12101-0938808-1

56

وکالت نامہ

KHYBER PAKHTUNKHWA BAR COUNCIL
1st Floor, 2 Block, Khyber Road Peshawar, Ph. 091-9211172, Fax: 091-9213914
E-mail: support@kpbarcouncil.com, www.kpbarcouncil.com



بعدالت جناب سروس نرسونل K.P.K پشاور
مخاتب ایڈولٹ و سیم عباس
وسیم عباس بنام گورنمنٹ کالجی سٹریٹ
دعویٰ یا جرم

تفصیل دعویٰ یا جرم سروس نرسونل K.P.K S.T. Acl 1974 کالجی سٹریٹ
باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی وجوہات کے پیشگی یا تفسیر مقدمہ مقام کیلئے
میں جس میں...
کوحسب ذیل شرائط بریکل مقرر کیا ہے، کہ میں ہر ججی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور ہر وقت پارے جائے مقدمہ وکیل صاحب
موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشگی پر مظهر حاضر نہ ہوں۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف
اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے
ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ
ہوں گے۔ اور مقدمہ صدر بکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ
دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بخانہ دہاں کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ
ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو مرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراءے ڈگری و نظر ثانی اپیل گمرانی و ہرجم درخواست پر دستخط و تصدیق کرنے کا
بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہرجم کاروپہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہرجم کے بیان دینے اور اس پر عائن یا راضی نامہ فیصلہ بر
حکم کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشگی مقدمہ مذکورہ بیرون از بکھری صدر بیروی مقدمہ مذکورہ نظر ثانی و اپیل و گمرانی و ہرجم کی
مقدمہ یا منسوخی ڈگری کیلئے یا درخواست حکم انتہائی یا قریبی یا گمرانی عمل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا تکلیف عائد بیروی کا اختیار ہوگا
اور تمام ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو
کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گمرانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا ایڈووکیٹ اپنے مجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو
بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جہانہ التواہ پر کیا، وہ صاحب
موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشگی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی
صورت میں میرا کوئی مطالبہ کسی حکم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ 4 جولائی 2013

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد العبد العبد

Accepted by [Signature] 4/7/13

ایڈولٹ و سیم عباس 03339967079 [Signature]

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

Regg
No.

TB DIK

APPEAL No. 1087 of 2022

Waseem Abbas

Appellant/Petitioner

Versus

Through Secy. Home Deptt Pesh

RESPONDENT(S)

Resp: NO 4 Regional Director Administration
Notice to Appellant/Petitioner DI Khan Region
DILKhan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27-7-22 at 8:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court
DILKhan

[Signature]

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

Resd
No.

TB D/K

APPEAL No. 1087 of 2022

Waseem Abbas

Appellant/Petitioner

Versus

Through Secy, Home Dept Pesh

RESPONDENT(S)

Resps No 5 District Public Prosecutor
Notice to Appellant/Petitioner D/Khan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27-7-22 at 9:00 AM.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp Court
D/Khan

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.