

12th Oct, 2022

Junior of learned counsel for the appellant present.
Muhammad Adeel Butt, Addl: AG for respondents
present.

Junior of learned counsel for the appellant seeks
adjournment on the ground that learned senior counsel
was busy before the Hon'ble Peshawar High Court.
Adjournment granted but on payment of cost of Rs. 5000/-
which shall be deposited by the appellant. To come up for
arguments on 22.11.2022 before D.B.



(Farceha Paul)
Member(Executive)

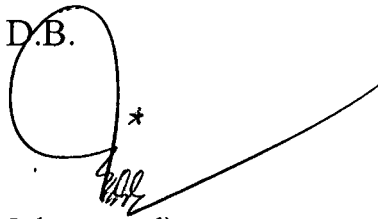


(Kalim Arshad Khan)
Chairman

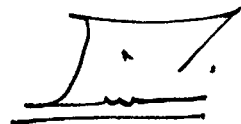
22.11.2022

Mr. Izazullah, junior of learned counsel for the appellant
present. Mr. Farhan Ahmad, Superintendent alongwith Mr.
Muhammad Riaz Khan Paindakhel, Assistant Advocate General for
the respondents present.

Junior of learned counsel for the appellant requested for
adjournment on the ground that learned counsel for the appellant is
busy in the august Peshawar High Court, Peshawar. He also stated
that cost of Rs. 5000/- will be submitted on the next date. Adjourned.
Last opportunity given. To come up for arguments on 02.12.2022
before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

SCANNED
Peshawar

21.09.2021

Junior to counsel and Mr. Kabirullah Khattak, Addl. AG alongwith Farhan, Superintendent for the respondents present.

Learned counsel for the appellant is not in attendance due to indisposition and request for adjournment is made on his behalf. Request accorded. To come up for arguments on ~~10.01.2022~~ before the D.B.


(Rozina Rehman)
Member(Judicial)


Chairman

10.01.2022

Learned counsel for the appellant present. Mr. Muhammad Rasheed, DDA for respondents present.

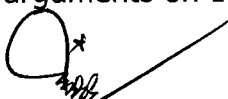
Due to non-availability of Hon'able Member (J), the case could not be heard. Adjourned. To come up for arguments on 22.04.2022 before D.B


(MIAN MUHAMMAD)
MEMBER (E)

22nd April, 2022

Learned counsel for the appellant present. Mr. Naseer uddin Shah, Asst. AG for the respondents present.

Learned counsel for the appellant seeks adjournment. Last opportunity is granted otherwise the case will be decided on the basis of available record without arguments of the counsel. To come up for arguments on 14.07.2022 before the D.B.


(MIAN MUHAMMAD)
Member (E)


Chairman

14-7-22

Proper DB not available the case is adjourned to 12-10-22


Reader

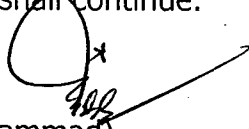
29-12-2020

Due to summer vacation, case is adjourned to
16-03-2021 for the same as before.


Reader

16.03.2021 Counsel for the appellant and Mr. Noor Zaman,
District Attorney alongwith Farhan Superintendent for the
respondents present.


Former requests for adjournment in order to seek
fresh instructions from the appellant who is presently at
Karachi. Adjourned to 26.04.2021 for hearing before the
D.B. Till next date, the restraint order passed on
10.04.2019 shall continue.


(Mian Muhammad)
Member (E)


Chairman

26-4-2021

*Due to COVID-19, the case is
adjourned to 16-8-2021 for the same.*


Reader

16.08.2021 Since 16.08.2021 has been declared as Public holiday on
account of Moharram, therefore, case is adjourned to 21.09.2021 for
the same as before.


Reader



28.10.2020

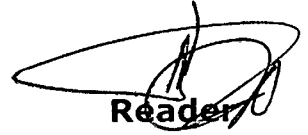
Proper D.B is on Tour, therefore, the case is
adjourned for the same on 29.12.2020 before D.B.



Reader

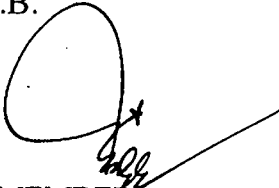
30.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 08.06.2020 for the same as before.


Reader

08.06.2020

Clerk to counsel for the appellant present. Addl: AG for respondents present. Due to general strike of the Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for arguments on 17.08.2020 before D.B.


MEMBER


MEMBER

17.08.2020

Due to summer vacations, the case is adjourned to 28.10.2020 for the same.


Reader

16.10.2019

Junior to counsel for the appellant and Addl. AG alongwith Attaur Rahman, Administrative Officer for the respondents present.

Representative of respondents has furnished Parawise comments on behalf of respondents No. 1, 2 & 3. Placed on record. The appeal is assigned to D.B for arguments on 24.12.2019. The appellant may submit rejoinder, within a fortnight, if so advised.


Chairman

24.12.2019

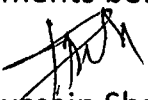
Junior to counsel for the appellant and Mr. Zia Ullah learned DDA present. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 13.02.2020 before D.B.

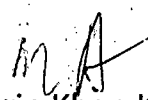

Member


Member

13.02.2020

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Atta-ur-Rehman, Administrative Officer for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 30.03.2020 for arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

105/2019

28.05.2019

Counsel for the appellant and Addl. AG for the respondents present.

Learned AAG undertakes to require the respondents to submit the requisite reply on next date of hearing.

Adjourned to 04.07.2019 for submission of written reply/comments before S.B. Till next date the impugned recovery shall not be made by the respondents.


Chairman

04.07.2019

Nemo for the parties. Fresh notices be issued to them. To come up for written reply/comments on 30.08.2019 before S.B.


Member

30.08.2019

Counsel for the appellant and Addl. AG alongwith Farhan Superintendent for the respondents present.

Representative of respondents requests for time. Adjourned to 16.10.2019 on which date the requisite reply shall positively be submitted.


Chairman

10.04.2019

Counsel for the appellant present.

It was argued by the learned counsel for the appellant that departmental proceedings culminating into the impugned order dated 20.08.2018 were not conducted in accordance with law. So much so, the appellant was not even confronted with the charge sheet or statement of allegations. He referred to the contents of impugned order of removal from service passed against the appellant as well as of the show cause notice and stated that the specific allegations against the appellant were not noted therein. He further referred to notification dated 20.04.2017 whereby service of the appellant was placed on the disposal of Director General Pakistan Forests Institute Peshawar for further posting as Lecturer in Forestry (BS-17).

In view of above, the instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 28.05.2019 before S.B.

An application for order restraining the respondents from effecting recovery of Rs.2.04 Million from the appellant has been submitted today which is placed on file. Notice of the application be also given to the respondents for the next date. Till the next date of hearing, the impugned recovery shall not be made by the respondents.




Appellant Deposited
Security & Process Fee


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 105/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/1/2019	<p>The appeal of Dr. Muhammad Nawaz Rajpar presented today by Mr. Noor Muhammad Khattak 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 23/1/19</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>5-3-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	05.03.2019	<p>Clerk to counsel for the appellant present and requested for adjournment as counsel for the appellant is not in attendance. Adjourned. To come up for preliminary hearing on 10.04.2019 before S.B</p> <p style="text-align: right;"> (Muhammad Hamid Mughal) Member</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE TRIBUNAL NO. 105 /2019

DR. MUHAMMAD NAWAZ VS GOVT. OF KP & OTHERS

INDEX

S. NO	<u>DOCUMENTS</u>	<u>ANNEXURE</u>	<u>PAGE</u>
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4	Appointment order & charge report	A & B	6- 11.
5	NOC & Surety Bond	C & D	12- 13.
6	Joining report & Degree	E & F	14- 15.
7	Advertisement & application	G & H	16- 17.
8	NOC & Notifications	I & J	18- 20.
9	Notification dt: 30.9.2016 & arrival	K & L	21- 22.
10	Notification dt: 20.4.2017 & arrival	M & M1	23- 24.
11	Requests	N	25- 27.
12	Appointment order & joining report	O	28- 29.
13	Show cause & reply	P	30- 34
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15	Departmental appeal	R	36- 38.
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17	Vakalat nama	42.

APPELLANT

Through:


NOOR MOHAMMAD KHATTAK,
ADVOCATE

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

SERVICE APPEAL NO. 105 /2019 Diary No. 96

Dated 23/01/2019

Dr. Muhammad Nawaz Rajpar, Ex: Lecturer in Forestry,
Pakistan Forest Institute, Khyber Pakhtunkhwa, Peshawar presently
serving as Assistant Professor, Shaheed Benazir Bhutto University,
sheringal, Dir Upper.

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2- The Secretary, Forest, Environment & Wildlife Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General, Pakistan Forest Institute, Khyber Pakhtunkhwa, Peshawar.

..... **RESPONDENTS**

**SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED NOTIFICATION DATED
20.8.2018 COMMUNICATED TO THE APPELLANT
17.9.2018 WHEREBY MAJOR PENALTY OF REMOVAL
FROM SERVICE ALONG WITH RECOVERY OF RS. 2.04
MILLION HAS BEEN IMPOSED ON THE APPELLANT AND
AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL
APPEAL OF APPELLANT WITHIN THE STATUTORY
PERIOD OF NINETY DAYS**

Filed to-day
Registrar
23/1/2019

PRAYER: That on acceptance of this service appeal the impugned Notification dated 20.8.2018 communicated to the appellant on 17.9.2018 may very kindly be set aside and the respondents may be directed to re-instate the appellant for the purpose of regularly relieving the appellant and the recovery amounting Rs.2.04 Million may kindly be set aside. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

R.SHEWETH:

ON FACTS:

**Brief facts giving rise to the present *appeal*
are as under:**

- 1- That initially the APPELLANT was appointment as Technical Assistant (BPS-16) vide order dated 20-09-2000 in the office of respondent No.3. That during service the APPELLANT was appointed as Lecturer in Forestry at Pakistan Forest Institute, Peshawar vide order dated 06-09-2007 on the proper recommendation of Federal Public Service Commission Islamabad, accordingly the APPELLANT joined his duty as Lecturer on 14-09-2007 and started his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of appointment order & joining report is attached as annexure **A & B.**
- 2- That, APPELLANT has been awarded a scholarship of Ph.D in the field of "Wildlife Management by the Government of Pakistan under Forestry Sector Research and Development Project from Putra University, Malaysia for which proper NOC was granted by Government of Pakistan Ministry of Environment in lieu thereof Surety Bond was also furnished by the APPELLANT. Copies of NOC and surety bond are attached as annexure **C & D.**
- 3- That the APPELLANT after completion of his Ph.D program from Putra University, Malaysia in the year 2010 submitted joining report vide dated 5.10.2010 for duty before the respondent no.3. Copy of Joining Report and Degree are attached as annexure **E and F.**
- 4- That, in the meanwhile a project post of consultant (Wildlife) was advertised by Forest, Environment and Wildlife Department Government of Sindh for which the APPELLANT was fulfilling the requisite advertised criteria applied for the said post through proper channel, accordingly the APPELLANT was selected on the post of Consultant (Wildlife) on contract basis for a period of two years vide Notification dated 15-08-2014. Copies of the advertisement, application, NOC and Notifications are attached as annexure **G, H, I & J.**
- 5- That on completion of the project the APPELLANT was repatriated to his parent Department i.e. Pakistan Forest Institute Peshawar vide notification dated 30-09-2016, accordingly the APPELLANT submitted his arrival report and started his duty on his previous position as Lecturer. Copies notification dt: 30.9.2016, arrival report, Notification dt: 20.4.2017 and arrival report are attached as annexure **K, L, M & M1.**
- 6- That APPELLANT after submitting arrival report before the respondent no.3 in PFI Peshawar, the APPELLANT started performing his duty as Lecturer regularly, efficiently but after the passage of more than six months when the salary of the

APPELLANT was not released, the APPELLANT submitted a request for the issuance of salary and also forwarded an application for the provision of other basic facilities but no reply was received from the concerned quarter. Copies of the requests are attached as annexure **N.**

7- That in the meanwhile some post of Assistant Professors on TTS basis were advertisement in Shaheed Benazir Bhutto University Sheringal, Dir Upper. That APPELLANT applied for the post of Assistant Professor in the said university through proper channel and accordingly the APPELLANT was selected by the syndicate vide order date 14-11-2016 and as such the APPELLANT submitted his joining report on 01-03-2017. Copies order and joining report and application are attached as annexure **O.**

8- That inspite of knowing all the above circumstances the respondents initiated disciplinary proceedings against the APPELLANT on the pretext that APPELLANT has violated condition No.3 of the affidavit which the APPELLANT had signed/furnished with the Department. That in response the APPELLANT submitted his reply to the show cause dated 13-04-2017 and fully explained the situation regarding the difficulties he had faced in the Department after his arrival from abroad. Copies of the Show Cause & Reply are attached as annexure **P.**

9- That the respondents without conducting regular inquiry and associating the APPELLANT in the inquiry straight away issued the impugned Notification dated 20.8.2018 communicated to the appellant on 17.9.2018 whereby the APPELLANT has been removed from service along with recovery amounting Rs.2.04 million. Copy of the impugned order dated 20.8.2018 is attached as annexure **Q.**

10- That feeling aggrieved the APPELLANT filed Departmental appeal before the appellate authority but no reply has been received so where after the appellant knocked the door of august Peshawar High Court and as such the Peshawar High Court, Peshawar suspended the operation of the impugned order to the extent of recovery vide judgment dated 17.11.2018. Copies of the Departmental appeal and judgment are attached as annexure **R and R1.**

11- That appellant having no other remedy filed the instant appeal on the following grounds.amongst the others.

GROUND:

- A-** That the impugned Notification dated 20.8.2018 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B-** That APPELLANT has not been treated by the respondent Department in accordance with law and rules on the subject noted and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C-** That the respondents acted in arbitrary and malafide manner by issuing the impugned Notification dated 20.8.2018.
- D-** That APPELLANT has been discriminated by the respondents by issuing the impugned Notification dated 20.8.2018.
- E-** That, the act of the respondent is also violative of Article-37 of the Constitution of Islamic Republic of Pakistan that guarantees promotion of Social Justice & eradication of Social Evils.
- F-** That according to Article 38 (e) of the Constitution of Islamic Republic of Pakistan 1973 state is bound to reduce disparity in the income and earnings of individuals including persons in the various classes of the service of Pakistan, therefore in the light of the above mentioned Article the impugned Notification dated 20.8.2018 is not tenable and liable to be set aside.
- G-** That according to the Deed agreement of the Higher Education Commission there is no bar on the scholar that he will only serve the concern Department on his return to Pakistan.
- H-** That no such condition has been laid down in one of the agreement deed of the respondent Department but in the case of the APPELLANT the respondents laid down/attached the condition that the APPELLANT will have to serve the Department, therefore the act of the respondent Department is discriminatory and malafide one.
- I-** That no charge sheet and statement of allegation has been served on the APPELLANT before issuance of the impugned order Notification dated 20.8.2018 against the APPELLANT.
- J-** That no chance of personal hearing /defense has been provided to the APPELLANT before the issuance of impugned Notification dated 20.8.2018.

- K-** That no regular inquiry has been conducted in the matter of the APPELLANT which is as per Supreme Court judgment is necessary in punitive actions against the civil servant.
- L-** That APPELLANT seeks permission to advance grounds and proofs at the time of hearing.

Dated:21.1.2019

APPELLANT



DR. MUHAMMAD NAWAZ RAJPAR

Through:



NOOR MOHAMMAD KHATTAK

&



MUHAMMAD MAAZ MADNI

Advocate, High Court,
Peshawar

Government of Pakistan
Ministry of Environment, Local Government
And Rural Development

No. F. 1-1/89-IGP/Admn-III Islamabad, the 20th September, 2000

MEMORANDUM

Subject: RECRUITMENT TO THE POST OF TECHNICAL ASSISTANT,
(BPS-16) IN PAKISTAN FOREST INSTITUTE, PESHAWAR (RFI)

Mr. Muhammad Nawaz Rajpar is informed that on the recommendation of the Federal Public Service Commission and with the approval of the Establishment Division, he has been selected for appointment as Technical Assistant (BPS-16), in pay scale Rs. 2535-197-5490, in the Pakistan Forest, Peshawar on the following terms and conditions:-

- a) The appointment will be purely temporary and will not confer on him any right for permanent retention in the Department or alternate arrangements elsewhere in case of termination.
 - b) He will be on probation for a period of one year may be extended according to rules.
 - c) That he will be required to sign an undertaking in the prescribed form.
 - d) The employment will be subject to production of necessary character certificate from the Class-1 Officers and satisfactory verification of his character and antecedents and production of certificate of Medical fitness from Civil Surgeon.
 - e) The terms and conditions of his service will be regulated by the Civil Servants Act, 1973 (LXX of 1973) the Government Servants (appointment, Promotion and Transfer) Rules, 1973 and any other Rules and Regulations framed by the Government from time to time.
 - f) No TA/DA will be paid to him on his joining the appointment in this Division.
2. If the offer is acceptable to him on the above terms and conditions, the should report for duty to the Ministry of Environment, Local Government and Rural Development, Islamabad but not later than 15 days, failing which the offer will be treated as cancelled.

(Munir Ahmad)
(Section Officer (Admn-III/Trg))

Mr. Muhammad Nawaz Rajpar,
C/O A. Karim Rajpar S.D.M.
Hyderabad (Sindh)

Mr. Muhammad Nawaz Rajpar,
Village Raban Rajpar,
P.O. Jani Burriro,
Talk: Kotdiji,

ATTESTED

Government of Pakistan
Ministry of Environment, Local Government
and Rural Development.

A 6

No. F.1-1/89-IGF/Admn-III

Islamabad, the 20th September, 2000

MEMORANDUM

Subject: RECRUITMENT TO THE POST OF TECHNICAL ASSISTANT; (BPS-16)
IN PAKISTAN FOREST INSTITUTE, PESHAWAR (PFI)

Mr. Muhammad Navaz Rajpar is informed that on the recommendation of the Federal Public Service Commission and with the approval of the Establishment Division, he has been selected for appointment as Technical Assistant (BPS-16), in pay scale Rs. 2535-197-5490, in the Pakistan Forest Institute, Peshawar on the following terms and conditions:-

Handwritten notes:
F.1-1/89-IGF/Admn-III
20th Sept 2000
M. Navaz Rajpar
PFI

- a) The appointment will be purely temporary and will not confer on him any right for permanent retention in the Department or alternate arrangements elsewhere in case of termination.
- b) He will be on probation for a period of one year may be extended according to rules.
- c) That he will be required to sign an undertaking in the prescribed form.
- d) The employment will be subject to production of necessary character certificate from the Class-1 Officers and satisfactory verification of his character and antecedents and production of certificate of Medical fitness from Civil Surgeon.
- e) The terms and conditions of his service will be regulated by the Civil Servants Act, 1973 (LXX of 1973) the Government Servants (Appointment, Promotion and Transfer) Rules, 1973 and any other Rules and Regulations framed by the Government from time to time.
- f) No TA/DA will be paid to him on his joining the appointment in this Division.

ATTESTED
[Signature]

contd...P/2

Annexure-B

ATTESTED
[Signature]

7

2. If the offer is acceptable to him on the above terms and conditions, he should report for duty to the Ministry of Environment, Local Government and Rural Development, Islamabad but not later than 15 days, failing which the offer will be treated as cancelled.

Munir Ahmad
(Munir Ahmad)
Section Officer (Admn-III/Trg)

✓ Mr. Muhammad Nawaz Rajpar,
C/o A. Karim Rajpar S.D.M.
City Office
Hyderabad (Sindh)

Mr. Muhammad Nawaz Rajpar,
Village Raban Rajpar,
P.O. Jani Burrero,
Taluk : Kotdiji,
Distt : Khairpur Mirs.

ATTESTED
[Signature]

ATTESTED
[Signature]

BETTER COPY

8

TO BE PUBLISHED IN THE
GAZETTE OF PAKISTAN PART-1

8

Government of Pakistan
Ministry of Environment, Local Government
And Rural Development

Islamabad, the 7th October, 2000

NOTIFICATION

No. F.1-1/89-IGF. Admn.III In Pursuance of the recommendations of Federal Public Service Commission vide their letter No. F. 4-143/99-R-III, dated 24-08-2000, the competent authority has been pleased to appoint Mr. Muhammad Nawaz Rajpar as Technical Assistant (BPS-16) in Pakistan Forest Institute, Peshawar w.e.f. 3-10-2000.

(Munir Ahmad)
Section Officer (Admn-III)

The Manager,
Printing Corporation of Pakistan Press,
Karachi

Copy forwarded.

ATTESTED

ATTESTED

Government of Pakistan
Ministry of Environment, Local Government
and Rural Development

Islamabad, the 7th October, 2000

NOTIFICATION

No. F.1-1/89-IBF. Admn.III In pursuance of the recommendations of Federal Public Service Commission vide their letter No. F.4-143/99-R-III dated 24-08-2000, the competent authority has been pleased to appoint Mr. Muhammad Nawaz Rajper as Technical Assistant (BS-16) in Pakistan Forest Institute, Peshawar w.e.f. 3-10-2000.

sl/-
(Munir Ahmad)

Section Officer (Admn-III)

The Manager,
Printing Corporation of Pakistan Press,
Karachi

Copy to :

- i) Mr. Pervez Akhtar, Director (Recruitment), FPSC, Islamabad.
- ii) Director General, PFI, Peshawar
- iii) A.O. (B&A), PFI, Peshawar
- ✓ iv) Officer concerned.
- v) Notification folder

Munir Ahmad
(Munir Ahmad)
Section Officer (Admn-III)

ATTESTED

ATTESTED

No. F.2(4)/2006Admn-III
Government of Pakistan
Ministry of Environment

By Register A/D

9

6th Sep.
Islamabad, the 3rd September, 2007

MEMORANDUM

**Subject: - RECRUITMENT TO THE POST OF LECTURE IN FORESTRY
BPS-17 PAKISTAN FOREST INSTITUTE, PESHAWAR,
MINISTRY OF ENVIRONMENT ISLAMABAD.**

Having been selected by Federal Public Service Commission, Muhammad Nawaz Rajpar, is offered temporary appointment to the post of Lecture in Forestry (BPS-17) in Pakistan Forest Institute, Peshawar, Ministry of Environment on the following terms and conditions:-

- i. The post of Executive Officer BPS-17 carries a pay scale of Rs. 8210-615-20510 plus usual allowances admissible under the existing Federal Government Rules.
- ii. The appointment will be temporary and, Muhammad Nawaz Rajpar will be on probation for a period of one year with effect from the date he joins duty. The period will be extendable by order either before or after its termination by a further period not exceeding one year, provided, that if no order has been made by the day following the termination of either of the aforementioned probationary periods, the appointment shall be deemed to be held until further orders.
- iii. His services are liable to termination at any time without assigning any reason, by giving a notice in writing from either side for a period of not less than fourteen days or payment in lieu of the notice of a sum equivalent to his pay for fourteen days or for the period by which the notice falls short of fourteen days.
- iv. His appointment will be subject to him being declared medically fit on such medical examination as may be necessary under the Rules and subject to verification of his documents/ certificates including domicile, character and antecedents and submission of an undertaking on prescribed form and character certificates.
- v. The appointment will not confer on him any title or claim for permanent retention in the Department.
- vi. No. TA/DA will be paid to him joining the appointment.
- vii. He is liable to serve any where in Pakistan.
- viii. He will have to submit the undertaking.
 - If he is married with a foreign national, he will not be eligible for appointment to the post but if he is married with an Indian Nationality after obtaining the permission of the government, he shall be eligible for appointment.


ATTESTED

ATTESTED

(10)

- He will be governed by the rules as contained in the Civil Servants Act, 1973, as amended from time to time.

2. In case the above terms and conditions are acceptable to, Muhammad Nawaz Rajpar he may report for duty within 14 days to the Pakistan Forest Institute, Peshawar failing which the offer will be treated as cancelled.


(Abdul Hafeez Bhatti)
Section Officer (Admn-III)

✓ Muhammad Nawaz Rajpar
Faculty of Forestry University Putra,
Malaysia, Serdang, Dar-UI-ehsan,
Malaysia

Copy for information to:-

- i. D.G PFI, Peshawar
- ii. Sadiq Ali Anjum Director FPSC, Islamabad w.r.t ther letter No. F.4-111/2007-R((FS-III) dated 23rd August 2007
- iii. Personal File.


Abdul Hafeez Bhatti
Section Officer (Admn-III)

ATTESTED


ATTESTED


To,

The Director General,
Pakistan Forest Institute,
Peshawar, Pakistan

B - (11)

Subject: **JOINING REPORT**

Dear Sir,

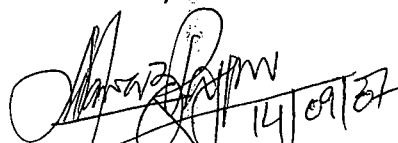
With due respect it is stated that I have been recommended by Federal Public Service Commission, Islamabad for the post of Lecturer in Forestry (BPS-17) consequent upon Ministry of Environment, Islamabad has offer me the post of **Lecturer in Forestry BPS-17** (Letters attached) dated 6th September, 2007.

Sir, I accept the terms and conditions mentioned in offer letter and join the post of Lecturer in Forestry BPS-17 on 14th September, forenoon.

There fore, it is requested that kindly accept my joining report, that I will ever remain highly thankful to you and obliged.


Thanking for your anticipation.

Your's Faithfully


14/09/07

Muhammad Nawaz Rajpar
Faculty of Forestry
University Putra Malaysia
Serdang Dar-UI-Ehsan
Selangor, Malaysia
43400

ATTESTED


ATTESTED


C 19




Islamabad, the 20th June, 2006


JOINT SECRETARY (ADMN)

NO OBJECTION CERTIFICATE

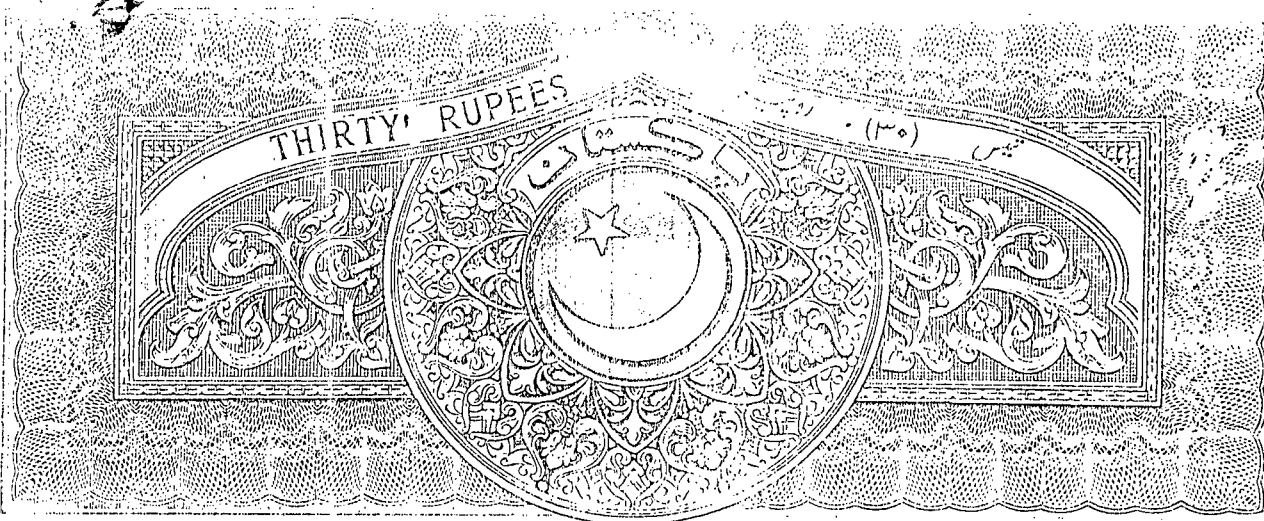
The Federal Minister for Environment has been pleased to approve the nomination of Mr. Muhammad Nawaz Rajpar, Technical Assistant, Pakistan Forest Institute, Peshawar, an attached Department of the Ministry of Environment, to attend a three years Ph.D course in Wildlife Management in Putra University, Malaysia with effect from July 3, 2006. Government of Pakistan has no objection to his proceeding abroad.


(Abid Baghir)
Joint Secretary (Admn)

ATTESTED


ATTESTED


Annexure - D



SURETY BOND

Memorandum of agreement between Muhammad Nawaz Rajpar and the President of Pakistan made this 14th December, 2009. Whereas Muhammad Nawaz Rajpar at present employed as Lecturer in Forestry, BPS-17, Forest Education Division, Pakistan Forest Institute, Peshawar (referred to as the scholar which expression shall include heirs, successors and legal representative) of the first part as a results of sponsoring by the Government of Pakistan, herein after referred to as the President which expression shall include his success or in office of the other part, has been awarded a scholarship in the field of "Wildlife Management" by the government of Pakistan Under Forestry Sector Research and Development Project. Now therefore, in consideration for the said award scholar agrees and undertake as follows;

1. He shall faithfully confirm to and abide by the institutions issued with regard to his studies by the offering country/organization during the period of his fellowship and shall whole heartedly and diligently engage himself in the studies, training and research work pertaining to the fellowship/scholarship abroad and shall take tests and examinations and may be prescribed.
2. He shall confirm his studies to the aforesaid field and shall not exchange it without prior permission of the President.
3. Upon the completion of terms of Fellowship/Scholarship he shall return to Pakistan and Serve President of Pakistan for a period not less than five years in any suitable post at Pakistan Forest Institute, Peshawar of which the President shall be the sole judge and upon such terms and conditions as the President may prescribe.
4. Upon the return from abroad he shall have no right to claim higher pay or seniority over others on account of the said training.
5. In the event of the breach of any of aforesaid terms not arising from his illness certified to the satisfaction of the President, the fellow/scholar binds himself firmly to pay on the demand of sum of Rs. 2.04 million (Rupees Two Million Rupees and Forty Thousands).

In witness where of he produces below two sureties who shall be responsible and stands bound by this agreement and guarantees that the fellow/scholar shall be fails to do so, the sureties shall identify and pay to the President the said amount in the default of payment by the fellow/scholar.

And we the sureties below agree and guarantee for the performance of promises that the fellow/scholar and for the payment of the said amount in default.

Signed by the two sureties:

Signed by the above bounden (Candidate)

ATTESTED

Muhammad
(Mansherwah)

Muhammad Nawaz Rajpar
(Muhammad Nawaz Rajpar)
Lecturer in Forestry

CAJAZ Khan
Witness by

1. *Mian Muhammad Shafiq*
(Mian Muhammad Shafiq)

2. *TANVIR AHMAD QURESHI*
TANVIR AHMAD QURESHI

Certified that both the above sureties are solvent and in position to pay the President the sum of Rs. 2.04 million (Rupees Two Million Rupees and Forty Thousands) in terms of the agreement.

[Signature]

4467
14/11/18

To

The Secretary
Forest, Environment & Wildlife Departments
Govt: of Khyber Pakhtunkhwa
Peshawar

L - 22
EB

Subject: ARRIVAL REPORT

Dear Sir,

With due respect, it is stated that Secretary Forest & Wildlife, Govt: of Sindh has repatriated my services and gave directive to report. my parent department vide notification NO.FT&WL(SO1)5(1)2016.

Sir, I give my arrival today forenoon on my previous post as lecturer in forestry. It is therefore, humbly requested that may kindly accept my arrival that I will ever remain thankful to you and obliged.

Thanking for anticipation

Dated 26/12/2016

Your's Sincerely



Dr. Muhammad Nawaz Rajpar
Lecturer in Forestry
PFI, Peshawar

ATTESTED



Copy to:

1. Director General, Pakistan Forest Institute Peshawar

ATTESTED



LI



GOVERNMENT OF SINDH
FOREST & WILDLIFE DEPARTMENT

Karachi, dated the 30th September, 2016

NOTIFICATION

K-21

NO.FT&WL(SOI)5(1)/2016 With the approval of Competent Authority (i.e Chief Secretary, Sindh), Dr. Muhammad Nawaz Rajpar, Consultant (BS-20), Sindh Wildlife Department, with effect from **15th August, 2014 to 14th August, 2016** on contract basis for a period of two years is hereby repatriated / relieved and directed to report to his parent department i.e Pakistan Forest Institute Peshawar with immediate effect and until further orders.

SECRETARY TO GOVERNMENT OF SINDH

NO:FT&WL(SOI)5(1)/2016

Karachi, dated the 30th September, 2016

A copy is forwarded to: -

- Accountant General, Sindh, Karachi.
- Secretary, Forestry, Environment & Wildlife Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
- Secretary, Finance Department, Government of Sindh, Karachi.
- Deputy Secretary (Staff) to Chief Secretary, Sindh, Karachi.
- Conservator Wildlife, Sindh, Karachi.
- ✓ P.S. to Secretary (Services), Services, General Administration & Coordination Department, Government of Sindh, Karachi.
- P.S. to Secretary, Forest & Wildlife Department, Govt. Sindh, Karachi.
- Officer concerned.



30/9/2016

**SECTION OFFICER-I
FOR SECRETARY TO GOVT. OF SINDH**

ATTESTED



ATTESTED

Annexure - 





GOVERNMENT OF SINDH
FOREST, ENVIRONMENT & WILDLIFE
DEPARTMENT

Karachi, dated the 27th August, 2014.

NOTIFICATION

20

No. SOIII/F&WL/1-2/2013: In pursuance of the Services, General Administration & Coordination Department, Government of Sindh's Notification No. SOII(S&GAD)3-21/2014, dated 15th August, 2014, Dr. Muhammad Nawaz Rajpar, Consultant (Wildlife) Equivalent to BS-20 Sindh Wildlife Department on Contract Basis has assumed the charge of the post of Consultant (Wildlife), Sindh Wildlife Department on 26th August, 2014.

WASIM AHMED URSANI
SECRETARY TO GOVERNMENT OF SINDH


No. SOIII/F&WL/1-2/2013

Karachi, dated the 27th August, 2014

A copy is forwarded to:-

1. Secretary to Chief Minister, Sindh, Karachi.
2. Secretary (Services), Services, General Administration & Coordination Department, Government of Sindh, Karachi.
3. Accountant General, Sindh, Karachi.
4. Deputy Secretary (Staff) to Chief Secretary, Sindh, Karachi.
5. Consultant (Wildlife), Sindh Wildlife Department, Karachi.
6. Conservator Wildlife, Sindh, Karachi.
7. Deputy Conservators Wildlife, Hyderabad / Sukkur.
8. Publisher, Sindh Government Printing Press Karachi for publication in the next issue of Government Gazette.
9. P.S. to Minister for Forests & Wildlife, Sindh, Karachi.
10. P.S. to Secretary, Forest, Environment & Wildlife Department, Govt. of Sindh, Karachi.
11. Personal file.
12. Office order file.

ATTACHED

 27/8/2014

SECTION OFFICER-I
FOR SECRETARY TO GOVERNMENT OF SINDH

ATTACHED

Annexure - K





J-19

**GOVERNMENT OF SINDH
SERVICES, GENERAL ADMINISTRATION
AND CO-ORDINATION DEPARTMENT**

Karachi dated the 15th August, 2014

NOTIFICATION

NO.SOII(SGA&CD)3-21/2014: On the recommendations of the Departmental Selection Committee and with the approval of Chief Minister Sindh, Dr. Muhammad Nawaz Rajpar is hereby appointed as Consultant (Wildlife) equivalent to BS-20 in Sindh Wildlife Department on contract basis for period of three years with immediate effect.

02. The terms and conditions of his appointment will be issued separately.

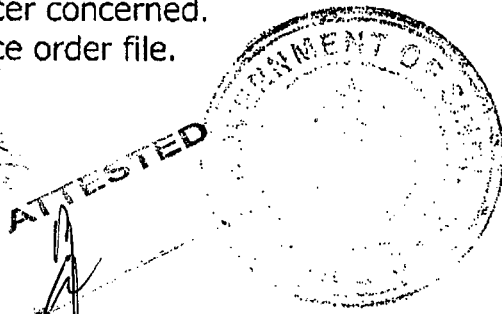
**SAJJAD SALEEM HOTIANA
CHIEF SECRETARY
GOVERNMENT OF SINDH**

No. SOII (S&GAD)3-21/2014,

Karachi dated the 15th August, 2014

A copy is forwarded for information and necessary action to:

1. The Principal Secretary to Chief Minister Sindh, Karachi.
2. The Secretary to Government of Sindh, Forest, Environment & Wildlife Department, Karachi.
3. The Accountant General Sindh Karachi.
4. The Superintendent, Sindh Govt. Printing Press, Karachi.
5. Officer concerned.
6. Office order file.

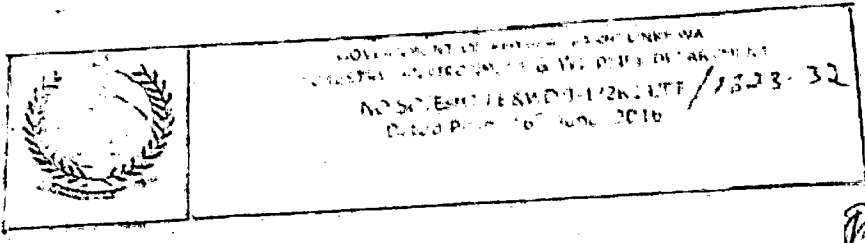


Abhinav
15/8/14
**(AKBAR ALI BRAHMANI)
SECTION OFFICER.II**

ATTESTED

Annexure-J

I-18



The Secretary to Government of Sindh
Forest, Environment and Wildlife Department
Karachi

SUBJECT: NO OBJECTION CERTIFICATE PAYMENT OF SURETY BOND AMOUNTING TO RS. 2.04 MILLION IN THREE INSTALMENTS

1. I am directed to refer to the application dated 6.6.2016 received through Director General Forests Institute, Peshawar (File No. 960/11, Pur) Estt dated 6.6.2016 on the above captioned subject and to state that the Provincial Government of Sindh, through the Forest, Environment and Wildlife Department has no objection to the appointment of Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry, Pakistan Forest Institute, Peshawar by the Government of Sindh as Consultant Wildlife Department subject to the following terms:-

1. Payment of Surety Bond amounting to Rs. 2.04 Million in three equal instalments as under to be paid in cash or Non-Judicial Stamp Paper available to him (copy of a copy) and cheques of the Govt Forest Department. Applicant has submitted bank pass book copy and

Instalment	Amount Rs	Date of Payment
1st Instalment	680,000	30.08.2016
2nd Instalment	680,000	30.08.2016
3rd Instalment	680,000	30.08.2016

the shall not claim payment of any amount in arrears on account of delay, even after the expiry of the above stipulated period for the period of his authorized absence i.e. from 23.11.2012 till 03/16/2016.

[Signature]
SECTION OFFICER

Forest No. 107/2016-17

Copies for reference to:-

1. Asst Secretary Forest, Environment and Wildlife Department (Physical Planning & Secretariat Services), Services, General Administration & Coordination Department, Government of Sindh, Karachi
2. Director General Forests Institute, Peshawar with reference to his letter No. 960/11, Pur dated 6.6.2016
3. Joint Conservator of Forests, Coastal & Southern Forest Region Peshawar
4. Director, Research and Development Forest Department
5. Director, Forest Development & Silviculture Department
6. Director, Forest Management, Director (Guarantor) R&D Directorate Forest Department, Peshawar dated 16/06/2016 in the case
7. Mr. Mubeen Suleh, Assistant Director (Guarantor) R&D Directorate Forest Department with his Affidavit undertaking dated 16.6.2016 in the case.
8. Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry, Pakistan Forest Institute, Peshawar, with reference to his original application dated 6.6.2016

ATTACHED
[Signature]

SECTION OFFICER

[Handwritten mark]

BETTER COPY -

18

GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
NO.SO(Estt)/FE&WD/1-1/2K14/PF/1823-32 Dated Pesh: 16th June, 2016

To,

The Secretary To Government Of Sindh,
Forestry Environment & Wildlife Department,
Karachi.

Dear Sir,

I Am Directed To Refer To The Application Dated 6/6/2016 Received Through Director General Pakistan Forest Institute Peshawar Letter No 960/F.I (Per) Estt Dated 6/6/2016 On The Above Captioned Subject And To State That The Provincial Government Of Khyber Pakhtunkhwa In Forestry Environment And Wildlife Department Has No Objection To The Engagement Of Dr. Muhammad Nawaz Rajpar, Lecturer In Forestry Pakistan Forestry Pakistan Forest Institute Peshawar By The Government Of Sindh As Consultant Wildlife Department Subject To The Following:-

1. Payment Of Surety Bond Amounting To Rs.2.04 Million In Three Equal Instalments As Undertaken By The Officer On Non Judicial Stamp Paper Executed By Him (Copies Enclosed) And Undertakings Of The Two Forest Department's Guarantor As Per Stipulated Time Lines Given Below; And

Installment	Amount Rs.	Date of payment
1 st installment	6,80,000/-	30/08/2016
2 nd installment	6,80,000/-	30/06/2017
3 rd installment	6,80,000/-	30/03/2018

2. He Shall Not Claim Payment Of Any Amount Or Arrears Or Arrears On Account Of Salary Leave Salary Or Any Other Emoluments/Benefits For The Period Of His Unauthorized Absence I.E From 23.11.2012 Till Date.

ATTESTED

SECTION OFFICER (ESTT)

Copy is forward to:-

ATTESTED

H-17

To

The Secretary
Environment Department
Khyber Pakhtunkhwa

Subject: REQUEST FOR NO OBJECTION CERTIFICATE TO APPLY FOR THE POST
OF CONSULTANT IN WILDLIFE (BPS-20) GOVT: OF SINDH

Dear Sir,

With due respect it is stated that the post of Consultant (BPS-20) in Sindh Wildlife Department, Government of Sindh has been advertised in daily Dawn dated 08 June, 2014 (Copy Attached). Sir, I fulfilled the requirement for the above said post of and want to apply.

Sir, I am under surety bond, if I am selected I will returned the surety bond money to Govt: of Pakistan. Therefore, it requested that may kindly issued a No Objection Certificate against the position of Consultant in Wildlife (BPS-20) to Secretary Forest, Environment and Wildlife Department, Govt: of Sindh that I will ever remain thankful to you and obliged.

Thanking for anticipation

Dated 12th June, 2014

ATTESTED
[Signature]

Yours Sincerely

[Signature]

Dr. Muhammad Nawaz Rajpar
Lecturer in Forestry
PFI, Peshawar

ATTESTED
[Signature]

Annexure - I

اور نام عندئذ
8- جون 2014
G 16

حکومت سندھ

تاریخ: 30-6-2017 کو اختتام پذیر ہونے والی 3 سالہ مدت

کلیے کٹرکٹ بنیادوں پر کٹسٹ کی خدمات درکار ہیں۔ کٹسٹ درج ذیل قابلیت اور تجربہ کا حامل ہونا چاہئے۔

قابلیت اور تجربہ:

• ایم ایس سی فارماری از پاکستان ٹاریسٹ اسٹیٹسٹ پٹار اور بیرون ملک سے اٹلا لائف ٹینٹ میں ای ایچ ڈی کا حامل ہو۔

• ایم ایچ ایچ ڈی کے شعبہ میں پوسٹ ڈاکٹریٹ کورسنگ کی قابلیت ضرور کیا جائے گا۔

• جنرل کی سرکاری ادارے میں فارماری اور اٹلا لائف کے شعبے میں ملازمت کا 8 سالہ ایس سے زائد تجربہ۔

• اٹلا لائف کے شعبوں پر مابلی جرائڈ میں کم از کم 10 لیرج آرٹیکلز شائع ہو چکے ہوں۔

جاب کسی ذمہ داریاں

کٹسٹ کو درج ذیل ٹیکس کے سلسلے میں ماسٹر پرنسپل جی کرنا ہوں گی:

- I۔ اٹلا لائف ایڈوکیٹیشن کی کونسل میں ملازم۔
- II۔ ڈپارٹمنٹ کی سائنسی خطوط پر ماسٹر ٹیک۔
- III۔ مابلی شاپنگ ڈپارٹمنٹ کی سپروائزری آرگنائزیشن۔
- IV۔ پرائیویٹ اور ایڈوکیٹیشن کی کورسوں میں کٹرکٹ کے لیے ریسرچ پروگرام کی تیارگی اور اس کا نازر۔

دیگر شرائط و ضوابط:

- امیدواران میں سے سب سے زیادہ اسکور کرنے والے ہوں۔
- درج ذیل میں جج کرانے وقت عمر کم سے کم 40 سال تک ہو۔
- کٹسٹ کو کٹرکٹری ٹاریسٹ، ایڈوکیٹیشن ایڈوکیٹیشن ڈپارٹمنٹ سندھ گورنمنٹ کرنا ہوگی۔
- ان کا کٹرکٹ سندھ سول سروس ایکٹ 1973 کے تحت ریکرٹمنٹ ہوگا اور تادیبی کارروائی اور وظیفہ کے سبب ہوں گے۔
- فیر ٹیل میں کٹرکٹ کی بنیاد پر انہیں 30 دن کے ٹریس پر ملازمت سے برخواست کیا جائے گا۔
- کٹرکٹ کی ایس ایس ڈی ایس نہیں دیا جائے گا۔
- تجربہ کا بیسیج BS-20 کے ابتدائی طور کے اسکیل انہا سسٹمز میں درج کے قابل اطلاق لائسنسز کے سادگی ہوگا۔
- ہر لاکھ سے کم لیرج ٹریس درج ذیل پڑھنا سے زیادہ، 15-6-2014 تک جج کرنا جائیں۔

دستخط: سیکشن آفیسر - I
برائے سیکرٹری حکومت سندھ

تاریخ: 30 جون 2017

تاریخ: 30 جون 2017

تاریخ: 30 جون 2017

ATTESTED

ATTESTED

For Lib

Handwritten signature

Handwritten signature

UNIVERSITI PUTRA MALAYSIA



It is hereby certified that

MUHAMMAD NAWAZ RAJPAR

having fulfilled the requirements prescribed by the Senate

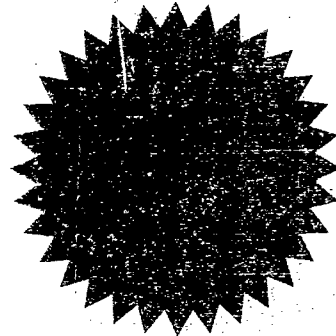
has been awarded the
Doctor of Philosophy

(Wildlife Management)

Vice Chancellor

Registrar

25 November 2010



ATTESTED

ATTESTED

F-15

To,

E-14

The Director General
PRI, Peshawar

Subject: Duty Joining Report.

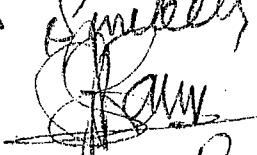
Dear Sir,

With due respect, it is
advised that I have complete my PhD
course in Wildlife Management from
Faculty of Forestry, Universiti Putra
Malaysia.

Therefore, it is humbly
requesting you kindly accept my
arrival that I will ever remain
thankful to you.

Thanks

Dated 5th October 2010

Your's Sincerely


ATTESTED

Dr. M. Naveed Raza
Lecturer in Forestry

- Annexure - 01

ATTESTED





GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

Dated Peshawar the 20th April, 2017

NOTIFICATION

No.SO(Estt)FE&WD/V-1/2k14: On repatriation from Government of Sindh Forest and Wildlife Department, the Competent Authority is pleased to place the services of Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry (BS-17), at the disposal of Director General Pakistan Forest Institute Peshawar for further posting as Lecturer in Forestry (BS-17) in PFI against his original post, in the best public interest, with immediate effect, till further orders.

SECRETARY TO GOVT; OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE
DEPARTMENT

No.SO(Estt)FE&WD/V-1/2k14: 1277-74

Dated Peshawar, 20th April, 2017

Copy is forwarded to:-

- 1) Accountant General, Sindh, Karachi.
- 2) Secretary Finance Department, Government of Sindh, Karachi.
- 3) Secretary Forest & Wildlife Department Government of Sindh, Karachi w/r to his Notification No.FT &WL (SOI)5(1)/2016 dated 30/9/2016.
- 4) Deputy Secretary (Staff) to Chief Secretary, , Sindh, Karachi.
- 5) Conservator Wildlife, Sindh, Karachi.
- 6) Director General, Pakistan Forest Institute Peshawar. He is directed that charge sheet and statement of allegation may be prepared against Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry (BS-17) and sent to this department for initiation of disciplinary action under E&D Rules 2011.
- 7) Director Budget & Accounts Cell, Forestry, Environment & Wildlife Department.
- 8) PS to Secretary, Forestry, Environment & Wildlife Department.
- 9) Officer concerned.
- 10) Personal file of the officer concerned.
- 11) Master file.
- 12) Office order file.

ATTESTED

ATTESTED

M1-261

To,
The Director General
PFI, Peshawar

Through: Proper Channel

Subject: ARRIVAL REPORT

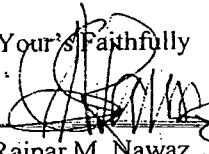
Dear Sir,

It is stated that Secretary Forest, Wildlife and Environment has issued order vide notification No. SO (Estt) FE&WD/V-1/2K14(237-74) Dated 20th April, 2017. I have to submit arrival report to Director General PFI, Peshawar.

Sir, in the light of above notification, I hereby submit my arrival report for further necessary action.

Thanking for anticipation

Your's Faithfully


Dr Rajpar M. Nawaz
Lecturer in Forestry

ATTESTED



ATTESTED



M1

No. 377/Fed(04)17
Date: 8/6/2017

N- (25)

To,

The Director General
Pakistan Forest Institute,
Peshawar

Through: Proper Channel

Subject: REQUEST FOR ISSUANCE OF SLARY SLIP

Dear Sir,

It is stated that I have submitted my duty report as a Lecturer in Forestry BS-17 dated 26th December, 2016 at Establishment Section, Secretary forest, wildlife and Environment office KPK. In continuation, they issued a notification that I submit an arrival report in PFI, Peshawar. Sir, I had submitted my arrival report on 5th June, 2017.

Therefore, it is humbly requested that my case may kindly be forward to Director, Budget Planning & Development Section, Secretary Forest, Wildlife & Environment office to issue the salary slip that I will ever remain thankful to you and obliged.

Thanking in anticipation

Your's Sincerely

[Signature]
8/6/2017

Dr. Muhammad Nawaz Rajpar
Lecturer
PFI, Peshawar

Forwarded

[Signature]
HSW

ATTESTED
[Signature]

ATTESTED
[Signature]

N



GOVERNMENT OF KHYBER PAKHTUNKHWA
 Forestry, Environment & Wildlife Department
 Forest Education Division, Pakistan Forest Institute, Peshawar
 E-mail: dir.fedu.pfi@gmail.com
 Ph: +92 91 9216127, Fax: +92 91 9221233
 SAY NO TO CORRUPTION



No. /Fed/() 17

Dated 12th June, 2017

To

The Director General
 PFI, Peshawar

26

Ⓢ

Through: Proper Channel

Subject: **REQUEST FOR RELEASE WITHHELD SALARY**

Dear Sir

With due respect, it is stated that my salary was withheld by Ex-DG, PFI, w.e.f. 01 July to 26th November, 2012 Sir, I make many time request to release the salary for above said period but till yet it pending. Sir, due to withholding of my salary, I am facing severe financial problem and my family is suffers alot.

Therefore, it is humbly requested that ~~my~~ kindly release my withheld salary above said period that I will ever remain thankful to you and obliged.

Thanking in anticipation

Forwarded 11/2
 Jamona
 WBS
 12/6

Your's Sincerely

[Signature]

Dr. Rajpar M. Nawaz
 LIF

12/6

Forest Education Division

ATTESTED
[Signature]

ATTESTED
[Signature]

27

~~27~~

To,
The Director General
Pakistan Forest Institute,
Peshawar

Through: Proper Channel

Subject: NON PROVISION OF BASIC FACILITIES

Dear Sir,

With due respect, It is stated, that on 21st December, 2016, I submitted my arrival in Establishment Section, Secretary Forest, Wildlife and Environment KPK after repatriation from the Government of Sindh. As per directions of the administration department KPK I submitted my arrival there and I have sent a copy of arrival to DG, PFI. After official codal formalities, they will issue notification than I have to submit my arrival in PFI. Sir, after receiving the notification, I submitted my arrival at PFI on 5th June, 2017.

That Sir, I submitted an application vide letter No. 377/FED(07)17 Dated 8th June, 2017 for issuing the Payslip that I can receive the salary. Sir, more than two months have been passed, but till date my salary slip has not been issued that I can draw my salary. Sir, I also submitted another application regarding to release my withheld from 1st July 2012 to 26th November, 2012 vide letter No 327/FED(07)2017 dated 12th June, 2017. But, till yet, no reply has been given nor withheld salary has been released. Sir, as you know, I belong to Sindh and I have to support my family. Sir, it is very difficult for me to stay and work here in Peshawar without having a salary.

Sir, that I also submitted an application for the provision of house allotment in campus on 6th June, 2017. A house was allotted, but sir, till yet, it has not been vacated administration of PFI from the illegal occupant Sir, I requested you in person, that I come daily from Mardan and it is very difficult for me to outback daily from Mardan to Peshawar, so please provide me temporary accommodation till house will be vacated, but no temporary accommodation was provided.

Sir, since, I have joined PFI, I taught various subjects to MSc and BS students in addition to teaching. I am also doing whatever official works as assigned by DFE.

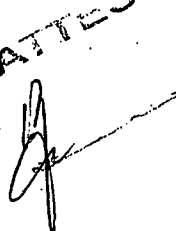
Based on the above facts, It is very difficult for me to stay in Mardan/Peshawar to pay huge expenses. Due to this reason I am unable to deliver my services.

Thanking in anticipation

ATTESTED

ATTESTED

Yours Sincerely


7/8/17

Dispatcher
General Section,
Pakistan Forest Institute,
Peshawar.



Dr. Muhammad Nawaz Bajpar
Lecturer
PFI, Peshawar

7/8/17

BETTER COPY

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Office of the Registrar

SHAHEED BENAZIR BHUTTO UNIVERSITY
Shering Dir Upper Khyber Pakhtunkhwa, Pakistan

Date: 18.11.2017

OFFICE ORDER

Project
On the recommendation of the Selection Board of the 8th meeting and subsequent approval of the Syndicate in the 14th meeting held on 14.11.2016 Dr. Rajpal Muhammad Nawaz S/O Muhammad Hasim is appointed as Assistant Environment ITS (Director Tech) as per the Policy in Forestry w.c.f his state of joining. His service are being allowed on probation for a minimum period of one year as per University statute.

He is advised to submit Medical Fitness certificate from the Medical Superintendent within one week their after his joining report.

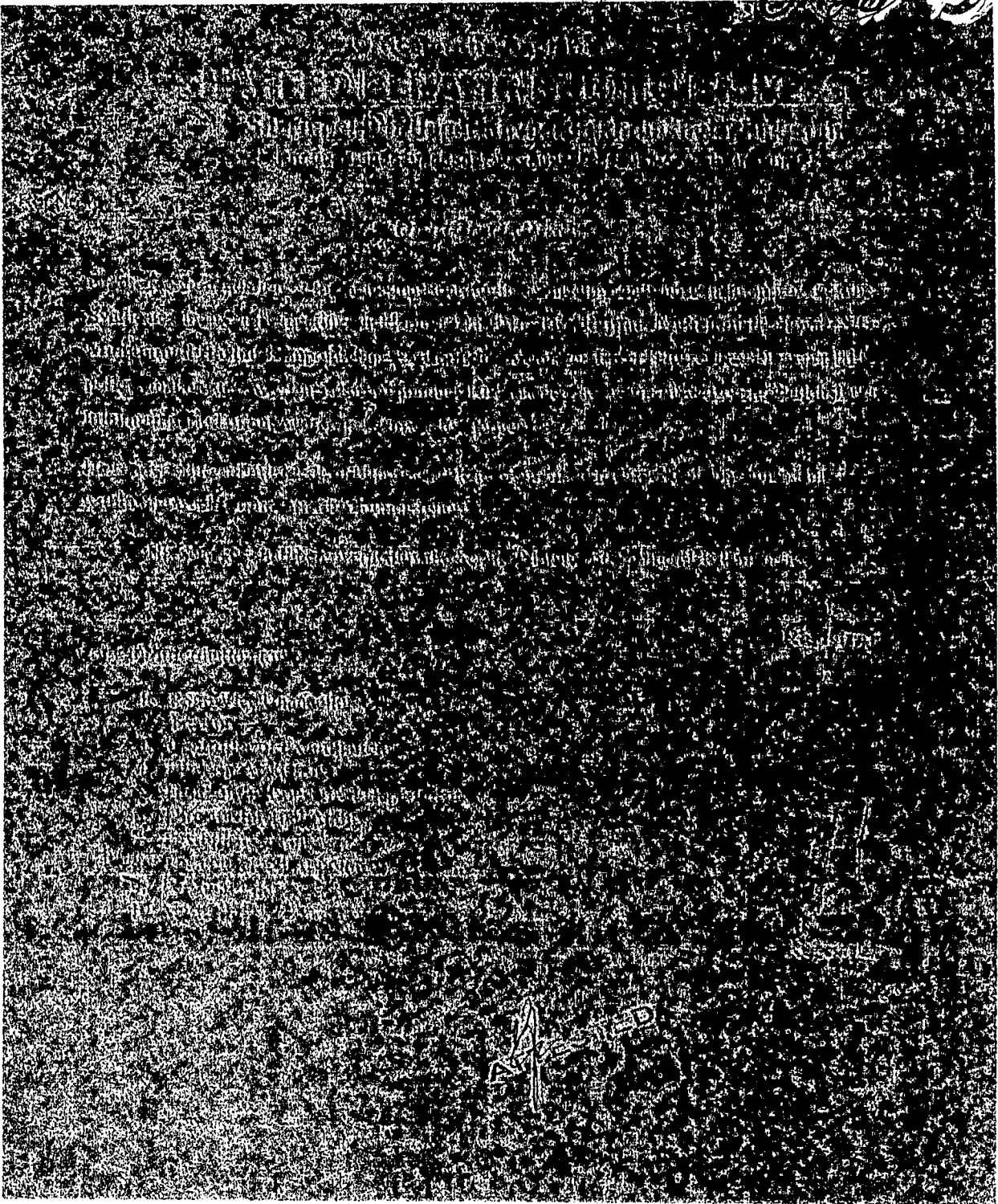
His services shall be governed by the Service Statute of Shaheed BB University.

Registrar

Copy forwarded.

ATTESTED

ATTESTED



ATTESTED

[Handwritten signature]

29

To,

The Vice Chancellor
SBCU Changanacherry
Dircleppan.

Subject: Duty Joining Report

Dear Sir,

With due respect, it is stated that I have been selected as Assistant Professor (TTS) by Syndicate dated 14-11-2016.

That Sir, I here join my duty as Assistant Professor (TTS) basis. Therefore, it is requested that you kindly accept my proposal. That I will remain thankful to you & obliged.

Thanking

Dated 18th March 2017

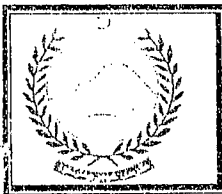
Yours sincerely

Dr. Kappan M. Nambiar
(A DC 170)

ATTESTED

ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

NO.SO(Estt)/FE&WD/V-1/2014/PF
Dated Peshawar the, 11th April, 2018

**Most Immediate
Through Fax**

To

✓ Muhammad Nawaz Rajpar,
Lecturer in Forestry (BS-17),
Pakistan Forest Institute,
Peshawar.

C/o Director General,
Pakistan Forest Institute,
Khyber Pakhtunkhwa,
Peshawar.

P-30

Subject: - SHOW CAUSE NOTICE

I am directed to refer to the subject captioned above and to enclose herewith Show Cause Notice (in duplicate) alongwith findings of the inquiry report with the request that reply to the show cause notice may be furnished to this department through Director General, Pakistan Forest Institute, Peshawar **within seven (07) days** positively for further necessary action.

2) Please acknowledge the receipt.

Encl: As above

(TARIQ JAMAL)
SECTION OFFICER (ESTT)

Endst: No: & date even

Copy is forwarded to:-

1. Director General, Pakistan Forest Institute, Peshawar. He is requested that on receipt of reply to the show cause notice from the accused, comparative statements with comments of the department (in annotated form) may be furnished to this department within stipulated period for further course of action.
2. PS to Secretary, FE&W department, Khyber Pakhtunkhwa for information.

SECTION OFFICER (ESTT)

DDT

for n/a Ps.

11/04/18

ATTESTED

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIORNMENT & WILDLIFE DEPARTMENT

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SHOW CAUSE NOTICE

I, Muhammad Azam Khan, Chief Secretary, Khyber Pakhtunkhwa as Competent Authority, under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry (BS-17), Pakistan Forest Institute, Peshawar as follows:-

- (i) That consequent upon the completion of the inquiry conducted against you by the Inquiry Committee for which you were given opportunity of hearing vide office communication No: SO (Estt)/FE&WD/V-1/2014/3602-05, dated 02nd November, 2017;
- (ii) On going through the findings and recommendations of the Inquiry Committee, the material on record and other connected papers including your defence before the Inquiry Committee.

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

- a) Inefficiency
- b) Misconduct

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of Removal from service

_____ under
Rule-4 of the said Rules.

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

4. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

5. A copy of the findings of the Inquiry Committee is enclosed.

ATTESTED

(Muhammad Azam Khan)
Chief Secretary,

ATTESTED

To:

The Chief Secretary
Government of Khyber Pakhtunkhwa
Peshawar

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Through: PROPER CHANNEL

Subject: SHOW CAUSE NOTICE

Respected Sir,

In response your letter No 591/F.I (Per)-Estt dated 13/04/2018 and SO(Estt)FE&WD/V-1/2014/PF Dated 11-04-2018 that show cause notice by Forestry Environment & Wildlife Department, Govt: KPK received on 20th April, 2018 indicate that I have committed inefficiency and misconduct acts as recommended by Inquiry Officers which imposed penalty removal from the service under rule of 3.

Sir, it is stated that my attitude was highly responsible and I never denied to work where ever I was directed to serve. Yes sir, before proceeding abroad for my PhD course I furnished surety bond amounting 2.04 million rupees that I will returned back to Pakistan after completing my PhD degree. Sir, as I committed, after obtaining my PhD Degree, I returned back and joined my duty in PFI, Peshawar. While, my other colleagues Mr. Muhammad Akbar and Mr. Tahir Chaudhry which were went to UK and Thailand for higher qualification. Sir, they never returned back and no recovery has been made from them. That Sir, if I was inefficient worker why did I came back and joined my duty? Even though, in my PhD defence I got post-doctorate offer from one of PhD my examiners. But Sir, I prefers to returned back to serve the country instead of luxury and peaceful working environment abroad.

That Sir, after joining the duty, I continue my research work and teaching. Sir, I had published 26 research articles in ISI impact factor journals, 2 book chapters in Springer (USA) and 4 book chapters Intech Open Access International publisher (Croatia), and One book on wetland birds published by Universiti Putra Malaysia Press in 2016 (Flag A).

That Sir, after 18th Amendment, I wrote an application to Secretary Establishments, Cabinet Division, Islamabad that my services should be transferred to Government of Sindh having domicile of Sindh Province (Flag B). After that, Sir, a harsh the conditions were created for me, such as; my salary was stopped by Director General, PFI through verbal orders in 2012 from June 2012 and no privilege of leave. That sir, I requested many times to DG, PFI to release my salary, as I belong to Sindh and I am a sole supporter of my family, with salary I cannot survive here, but all In vain. Sir, my salary was withheld from June to November, 2012 which is till date is pending.

ATTESTED



ATTESTED





Sir, mean while my grandfather passed away and my family got serious problem scuffle with another clan, a tribal conflict due to which I was unable to travel due to life threats to me and my family members, to resolve this issue I applied for 120 days earned leave which was rejected by DG, PFI even though one year earned leave was balance in my leave account (Flag C). On the rejection of my earned leave application, I opt leave without pay, I applied for two year leave without pay to resolve the scuffle (Flag D) Which was also rejected.

That Sir, mean while, the post of Consultant Wildlife (BS-20) in Sindh Wildlife Department was advertised and I applied for that. Consequent upon interview I was selected above said post. I applied for NOC subject to the condition that I will pay surety bond amount in three installments. But sir, even though I worked two and half year in Sindh Government but I have not received my salary which can be verified from Sindh Government. That sir, from where I pay surety bond money. Finally, Sindh government repatriates my service vide notification No. FT&WL (SOI) 2016 dated 30th November without approval from Chief Minister Sindh to my parent department (Flag E). That sir, I submitted an application to the Secretary Civil Services, Government of Sindh regarding my repatriation. He advice me to wait for reply, after decision, you can duty report in Administrative department KPK.

That Sir, I contacted with administrative department regarding my repatriation. They advice me to submit joining report and also sent copy of the joining report to DG, PFI Peshawar. They told me after approval from competent authority, they will notify than I have to report for duty in PFI, Peshawar. That sir, whatever they guided me I followed their instruction. Sir, I submitted my arrival on 21st December, 2016 and also send copy to DG, PFI (Flag F). Mean while, DG, PFI reported to I am absent from duty, even though I already submitted my arrival.

That sir, after four months, administrative department notify that I have to report for duty in PFI, Peshawar. Sir, once I received notification through post, I left for Peshawar and submitted my arrival in PFI on 5th June, 2017. After reporting for duty in PFI. I apply for issue to pay slip and release of withheld salary (Flag G) to DG, PFI. In addition, I applied for accommodation (Flag H). But Sir, all in vain, neither pay slip was issue nor withheld salary was release. Even though, no accommodation was provided that I can live and work smoothly. Sir, same environmental conditions were created, no salary and other relevant facilities. As you know sir, I belong to Sindh, how can survive without salary and other relevant facilities. Finally, I submitted an application that I am willing to deliver my service, but in such immense stress having no privilege of salary and other relevant facilities like other employee I am unable to work. In such environment, I will become psychological patient.

In the light of above facts, it is humbly requested that I may kindly be exonerated from charges of show cause notice against me and leveled against me a heavy penalty removal from service for which I shall be highly thankful to you forever.

 ATTESTED 

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That sir, it is humbly requested that your kindness may ensure release of all salaries and other relevant facilities I will make myself available to deliver my services my services to any suitable department such as wildlife, research and development.

Furthermore, it is humbly requested that I may also given a chance of personal hearing so, as to submit further clarifications in the defence of charges of Show Cause notice that I will ever remain thankful to you and obliged forever.

Thanking for anticipation

Your's Sincerely




Dr. Muhammad Nawaz Rajpar
Lecturer
PFI, Peshawar
rajparnawaz@gmail.com
03247700261

Cc:

1. Section Officer (Estt), Forestry, Environment & Wildlife Department, Govt: of Khyber Pakhtunkhwa
2. PS to Secretary, Forestry, Environment & Wildlife Department, Govt: of Khyber Pakhtunkhwa

ATTESTED


ATTESTED


GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

Dated Peshawar the, 20th August, 2018

NOTIFICATION

No. SO(Estt)FE&WD/V-1/2016: WHEREAS, Dr. Muhammad Nawaz Rajpar, Lecturer (BS-17) Pakistan Forest Institute (PFI), Peshawar was proceeded against the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, for the charges as mentioned in the charge sheet and statement of allegations served upon him;

AND WHEREAS, the Enquiry Committee comprising Mr. Junaid Khan (PMS BS-18)/Director General, Forest Department and Mr. Shafqat Munir, Divisional Forest Officer (BS-18)/Conservator of Forests, southern Circle, Peshawar was constituted to conduct inquiry against the said officer;

AND WHEREAS, the enquiry Committee, after having examined the charges, evidence on record and explanation of the officer, submitted its report, wherein the charges against the officer have been established beyond reasonable doubt;

AND WHEREAS, the Competent Authority, after considering the inquiry report and other related documents of the case, served a Show Cause Notice upon the above named officer to which he replied, and provided him opportunity of personal hearing;

NOW, THEREFORE, the Competent Authority, after having considered the charges, evidence on record, findings/recommendations of the Enquiry Committee, the explanation of the officer, personal hearing and exercising his powers under Rule-14(5)(ii) read with Rule 4(1)(b)(iii) and Rule-4(1)(a)(iii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, has been pleased to impose major penalty of "**Removal from service**" upon Dr. Muhammad Nawaz Rajpar, Lecturer (BPS-17) Pakistan Forest Institute (PFI), Peshawar and "**Recovery of an amount of Rs. 2.04 Million**" from him, spent on the officer out of Govt. expenditure for acquiring his PhD Degree from abroad in Wildlife Management, with immediate effect.

CHIEF SECRETARY
GOVT. OF KHYBER PAKHTUNKHWA

No. SO(Estt)FE&WD/V-1/2016

Dated Peshawar the, 20th August, 2018

ATTESTED



ATTESTED



**GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
DATED PESHAWAR THE, 20TH AUGUST, 2018**

Q-35

NOTIFICATION

8671-77

No.SO(Estt)FE&WD/V-1/2016: WHEREAS, Dr. Muhammad Nawaz Rajpar, Lecturer (BS-17) Pakistan Forest Institute (PFI), Peshawar was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, for the charges as mentioned in the Charge Sheet and Statement of Allegations served upon him;

AND WHEREAS, the Enquiry Committee comprising Mr. Junaid Khan (PMS BS-18), Director General, Sports Department and Mr. Shafqat Munir, Divisional Forest Officer (BS-18)/Conservator of Forests, Southern Circle, Peshawar was constituted to conduct inquiry against the said officer;

AND WHEREAS, the Enquiry Committee, after having examined the charges, evidence on record and explanation of the officer, submitted its report, wherein the charges against the officer have been established beyond reasonable doubt;

AND WHEREAS, the Competent Authority, after considering the inquiry report and other related documents of the case, served a Show Cause Notice upon the above named officer to which he replied, and provided him opportunity of personal hearing;

NOW, THEREFORE, the Competent Authority, after having considered the charges, evidence on record, findings/recommendations of the Enquiry Committee, the explanation of the officer, personal hearing and exercising his powers under Rule-14(5)(ii) read with Rule 4(1)(b)(iii) and Rule-4(1)(a)(iii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, has been pleased to impose major penalty of **"Removal from Service"** upon Dr. Muhammad Nawaz Rajpar, Lecturer (BS-17) Pakistan Forest Institute (PFI), Peshawar and **"Recovery of an amount of Rs.2.04 Million"** from him, spent on the officer out of Govt: expenditure for acquiring his PhD Degree from abroad in Wildlife Management, with immediate effect.

**CHIEF SECRETARY
GOVT: OF KHYBER PAKHTUNKHWA**

No.SO (Estt) FE&WD/ V-1/2016:

Dated Peshawar the, 20th August, 2018

Copy is forwarded to:-

- 1) Director General, Pakistan Forest Institute, Peshawar. He is requested to formulate a proper mechanism for recovery of the penalty amount either from the Ex-Lecturer, PFI or sureties i.e. Ayaz Khan, Senior Research Officer (BS-18), PFI and Nowsherwan Zarif, Assistant Silviculturist (BS-17), PFI as per the Surety Bond.
- 2) Director Budget and Accounts Environment Department for similar necessary action.
- 3) Dr. Muhammad Nawaz Rajpar, Lecturer, PFI C/O DG, PFI.
- 4) Programmer, B&A Cell, FE&W Department.
- 5) PS to Secretary, FE&W Department, Khyber Pakhtunkhwa.
- 6) Master file.
- 7) Office order file.

ATTESTED

(Hafiz Abdul Jalil)
SECTION OFFICER (ESTT)

ATTESTED

[Handwritten Signature]

BETTER COPY -  

GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR

No. 1477/F.II(Per)-Estt

Dated 17/09/2018
Through Registered Post

To

- Dr. Muhammad Nawaz Rajpar,
Ex-Lecturer in Forestry (BPS-17), PFI,
1. Village Raban Rajpar,
P.O Jani Burririo, Faulka Kodiji,
District Khairpur Mirs. Sindh
2. Assistant Professor (Forestry) (TTS),
Shahed Benzir Bhutto University,
Sheringale, Dir Upper, Khyber Pakhtunkhwa.

Subject: NOTIFICATION REGARDING REMOVAL FROM SERVICE

Please refer to the above cited subject and find enclosed herewith copy of notification No. SO(Estt)/FE&WD/V-I/2016/8671-77, dated 20.08.2018 of Forestry Environment & Wildlife Department, Government of Khyber Pakhtunkhwa regarding imposing major penalty of "Removal from Service" and recovery of an amount of Rs. 2.04 million" upon you with immediate effect.


You are, hereby requested to please immediately deposit Rs. 2.04 millions in government treasury and submit the original challan to this office.

Please acknowledge the receipt.

Director General

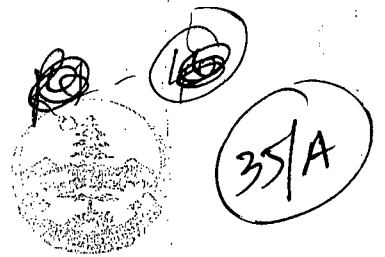
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ATTESTED




GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR
Ph: +92 91 9221224, 9216995. Fax: +92 91 9221233



(SAY NO TO CORRUPTION)

No. 1477 /F.I.(Per)-Estt

Dated 17/9 / 2018

Through Registered Post

To

1. Dr. Muhammad Nawaz Rajpar,
Ex-Lecturer in Forestry (BPS-17), PFI,
Village Raban Rajpar,
P.O Jani Burriro, Taulka Kodiji,
District Khairpur Mirs, Sindh
2. Assistant Professor (Forestry) (TTS),
Shaheed Benazir Bhutto University,
Sheringale, Dir Upper, Khyber Pakhtunkhwa

Subject: NOTIFICATION REGARDING REMOVAL FROM SERVICE

Please refer to the above cited subject and find enclosed herewith copy of notification No. SO(Estt)/FE&WD/V-1/2016/8671-77, dated 20-08-2018 of Forestry, Environment & Wildlife Department, Government of Khyber Pakhtunkhwa, regarding imposing major penalty of "Removal from Service" and "recovery of an amount of Rs. 2.04 million" upon you with immediate effect.

You are, hereby, requested to please immediately deposit Rs. 2.04 millions in government treasury and submit the original challan to this office.

Please acknowledge the receipt.

Shahid Hussain
Director General
of Forest

Cc:

1. The Registrar, Shaheed Benazir Bhutto University, Sheringale, Dir Upper, Khyber Pakhtunkhwa (Through Registered Post, email: registrarsbbu@gmail.com & fax: 0944885805).
2. ✓ Chairperson, Department of Forestry, Shaheed Benazir Bhutto University, Sheringale, Dir Upper, Khyber Pakhtunkhwa (Through Registered Post and email: shahziakhushdil@sbbu.edu.pk) with the request to please deliver the letter to Dr. Muhammad Nawaz Rajpar, ex-Lecturer in Forestry (BS-17), PFI, Peshawar, currently working as Assistant Professor (Forestry)(TTS) at SBBU, Sheringale, Dir Upper, Khyber Pakhtunkhwa under proper dated receipt and provide the acknowledgement of the said notification to this office for further necessary action.
3. Chief Secretary, Government of Sindh, Karachi.
4. Additional Chief Secretary, Forest and Wildlife Department, Government of Sindh, Karachi.
5. Director, Forest Education Division, PFI, Peshawar.
6. Section Officer (Estt), Government of Khyber Pakhtunkhwa, Forestry, Environment & Wildlife Department, w/r his endorsement No. SO(Estt)/FE&WD/V-1/2016, dated 20-08-2018.

ATTESTED

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To

THE HONOURABLE CHIEF SECRETARY,
Khyber Pakhtunkhwa, Peshawar.

R - (36)

Subject: **DEPARTMENTAL APPEAL AGAINST NOTIFICATION DATED
20.08.2018 COMMUNICATED TO THE APPELLANT ON 17-09-
2018.**

R/sir,

Most respectfully, it is stated that initially I was appointed as Technical Assistant (BPS-16) in the year 2000 and was later on appointed as Lecturer in Forestry at Pakistan Forest Institute Peshawar in the year 2007 on the recommendation of the Federal Public Service Commission Islamabad. I was performing my duties in the Pakistan Forest Institute Peshawar, I was awarded with a scholarship of Ph.D in the field of "Wild Management by the Government of Pakistan under Forestry Sector Research & Development Project from Putra University, Malaysia for which proper NOC was granted by government of Pakistan Ministry of Environment in lieu of submitting Surety Bonds which was also been furnished. After, completion of the Ph.D in the year 2010, I joined duty in the Pakistan Forest Institute Peshawar and started performing duty as Lecturer. In the meanwhile, post of Consultant (Wildlife) was advertised by Forest, Environment and Wildlife Department Government of Sindh for which I applied through proper channel and I was selected on the post of consultant (Wildlife) on contract basis for a period of 2 years. I was repatriated to my parent Department i.e. Pakistan Forest Institute Peshawar on 30-09-2016 and accordingly I started my duties as Lecturer. My salaries were not started for more than six month, I filed an application for the release of salaries and other basic facilities but no reply was received from the concerned quarter. I applied for the post of Assistant Professor in Shaheed Benazir Bhutto University Sheringal, Dir Upper on TTS basis and after fulfilling all the codal formalities was selected on the post os Assistant Professor by the Syndicate in the year 2016 and join duty there at SBB University Sheringal, Dir Upper on 01-03-2017. The Department i.e. Pakistan Forest Institute was well aware of the fact and despite of that

ATTACHED

of

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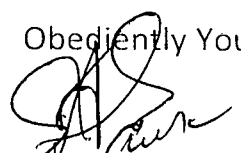
Now, I received letter dated 17-09-2018 contain information regarding notification of removal from service dated 20-08-2018 of Forestry, Environment & Wildlife Department, Government of Khyber Pakhtunkhwa, where upon Major Penalty of "Removal from Service" and another penalty "recovery of amount of Rs. 2.04 million" is imposed upon me.

It is, therefore, most kindly requested that Major Penalty has been imposed upon me without fulfilling the codal formalities required for the imposition of Major Penalty of Removal from Service has not been adopted and the notification dated 20-08-2018 is also not maintainable under the Law & Rules as double punishment has been imposed upon me i.e. (i) Removal from Service & (ii) Recovery of an Amount of Rs. 2.04 million (Surety amount given at the time of submitting surety bonds) may be withdrawn and I may be re-instated in to service with all back benefits and obliged please.

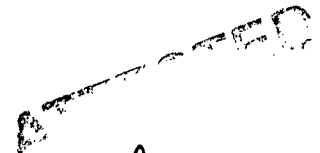
I shall be very thankful to for this kindness.

Dated:01.10.2018

Obediently Yours,



DR. MUHAMMAD NAWAZ RAJPAR,
Lecturer, Pakistan Forest Institute,
Peshawar



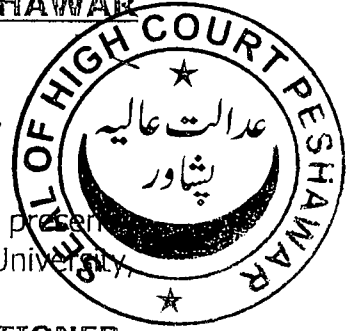
v / s /

R1 - (38)

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

WRIT PETITION NO. _____ /2018

Dr. Muhammad Nawaz Rajpar, Ex: Lecturer in Forestry,
Pakistan Forest Institute, Khyber Pakhtunkhwa, Peshawar present
serving as Assistant Professor, Shaheed Benazir Bhutto University,
Shringal, Dir Upper.



..... PETITIONER

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2- The Secretary, Forest, Environment & Wildlife Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Higher Education Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Director General, Pakistan Forest Institute, Khyber Pakhtunkhwa, Peshawar.
- 5- The Vice Chancellor, Shaheed Benazir Bhutto University Shringal, Dir Upper.

..... RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN 1973 AS AMENDED UP TO DATE**

FACTS:

**Brief facts giving rise to the present writ petition
are as under:**

- 1- That petitioner is the bonafide & Law abiding citizen of Pakistan and belongs respectable and law abiding family. Co
- 2- That initially the petitioner was appointment as Technical Assistant (BPS-16) vide order dated 20-09-2000 in the office of respondent No.3. That during service the petitioner was appointed as Lecturer in Forestry at Pakistan Forest Institute, Peshawar vide order dated 06-09-2007 on the proper recommendation of Federal Public Service Commission Islamabad, accordingly the petitioner joined his duty as Lecturer on 14-09-2007 and started his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of appointment order & joining report is attached as annexure A & B.

wp5749 2018 Dr Mohammad nawaz vs govt USB 56 pags

ATTESTED

**ATTESTED
EXAMINER
Peshawar High Court
30 NOV 2018**

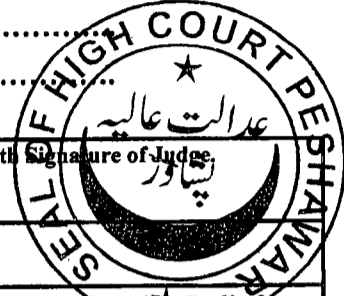
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PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

Court of.....

Case No.....of.....



Serial No. of Order of Proceedings	Date of Order of Proceedings	Order or other Proceedings with Signature of Judge
1	2	3
	ORDER 27.11.2018	Writ Petition No.5749-P/2018 with Interim Relief Present: Mr. Noor Muhammad Khattak, Adv., for Dr. Muhammad Nawaz Rajpar, petr. ***** SYED AFSAR SHAH, J.- Dr. Muhammad Nawaz Rajpar, the petitioner, through the instant constitutional petition, has asked for the issuance of an appropriate writ declaring that the Notification dated 20.08.2018 of the respondents to the extent of recovery of Rs.2.04 million from him, being nullity in the eye of law, is of no legal effect whatsoever. 2. We have gone through the available record carefully and considered the submissions made by the petitioner. 3. Since the appeal / representation of the petitioner, filed on 01.10.2018, as per statement of the

ATTESTED

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ATTESTED
EXAMINER
Peshawar High Court
30 NOV 2018

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petitioner and as is evident from the available record, is pending adjudication before the departmental authority viz. respondent No.1, therefore, we, at this stage, wouldn't like either to intervene or to touch / discuss merits of the case, lest it may prejudice the case of either party. However, we while disposing of this writ petition, direct the aforesaid departmental authority to decide the appeal / representation of the petitioner one way or the other strictly in accordance with law through a speaking order as early as possible but not later than one month, after receipt of this order and, till then, no recovery shall be effected from the petitioner in pursuant to the impugned notification. This writ petition is disposed of in the above terms.

Announced.
27. 11. 2018

JUDGE

JUDGE

ATTESTED

(Fayaz)(D.B. of Hon'ble Mr. Justice Syed Afsar Shah & Hon'ble Mr. Justice Ishtiaq Ibrahim)

No. 15758
 Date of Presentation of Application 28.11.18
 No of Pages 2/1
 Copying Fee
 Urgent Fee
 Total 12
 Date of Preparation of Copy 30.11.18
 Date of Delivery of Copy 28.11.18
 Received By

CERTIFIED TO P
 EX
 Peshawar High Court
 Authorized
 The Qanun

VAKALATNAMA

Before the KP Service Tribunal, Peshawar

No. _____/2019

Dr. Muhammad Nawaz (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt. of KP & others (RESPONDENT)
(DEFENDANT)

I/We Dr. Muhammad Nawaz

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2019



CLIENT



ACCEPTED

NOOR MOHAMMAD KHATTAK

SHAHZULLAH KHAN YOUSAFZAI

&
MIR ZAMAN SAFI
ADVOCATES

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M. NO. _____/2019

IN

SERVICE APPEAL No. _____/2019

MUHAMMAD NAWAZ

VS

GOVT: OF KP

APPLICATION FOR RESTRAINING THE RESPONDENTS
FROM MAKING RECOVERY OF RS. 2.04 MILLION FROM
THE APPELLANT TILL THE DISPOSAL OF THE ABOVE
MENTIONED APPEAL

R/SHEWETH:

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned order dated 20.08.2018 communicated to the appellant on 17.09.2018 whereby the appellant has been removed from service alongwith recovery of Rs. 2.04 million.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned order dated 20.08.2018 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the respondents may very kindly be restrained from recovery of Rs.2.04 million from the appellant till the disposal of the above mentioned service appeal.

Dated: 10.04.2019

APPLICANT



MUHAMMAD NAWAZ

THROUGH:



NOOR MOHAMMAD KHATTAK


SHAHZULLAH YOUSAFZAI
ADVOCATES

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M. NO. _____/2019

IN

SERVICE APPEAL No. _____/2019

MUHAMMAD NAWAZ

VS

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- 4- That the impugned order dated 20.08.2018 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the respondents may very kindly be restrained from recovery of Rs.2.04 million from the appellant till the disposal of the above mentioned service appeal.

Dated: 10.04.2019

APPLICANT



MUHAMMAD NAWAZ

THROUGH:



NOOR MOHAMMAD KHATTAK


&
SHAHZULLAH YOUSAFZAI
ADVOCATES

"B"

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

No.

Appeal No. 105 of 2019

Appellant/Petitioner

Versus

Respondent

Respondent No.

Notice to:

Handwritten notes and signatures in the notice to section.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 05-05-2019 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No. dated:

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

Day of..... 20

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. 105 of 20 19

Dr. Muhammad Ali Appellant/Petitioner

Versus

Govt of K.P. Respondent

Respondent No.

Notice to:

Handwritten notice details

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 8-5-019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

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

Given under my hand and the seal of this Court, at Peshawar this
Day of 20 19

Signature
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"A"

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

No.

APPEAL No..... of 20 .

.....
Appellant/Petitioner

Versus

.....
RESPONDENT(S)

Notice to Appellant/Petitioner.....
.....
.....

Take notice that your appeal has been fixed for Preliminary hearing replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on..... at.....

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.

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.

"B"

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

No.

105

19

Dr. *Muhammad Aslam Khan* 2019 *Asst. Professor*
Shah Waliullah University, Peshawar
Appellant/Petitioner
Vs
Secretary
Respondent

Respondent

Respondent No.

Notice for

Secretary
Chief Secretary
Govt. of K.P. through

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *20-8-2019* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... *31/8*

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....20

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

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

"B"

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

No.

Appeal No. 105 of 2019 *along with*

Dr. Muhammad Sajid Raza Appellant/Petitioner
Rest of Prof. Shafiqul Bari Versus *Dr. Iqbal Hussain*
Secretary, Forest Environment & Wildlife Deptt Respondent
through Chief Secretary

Respondent No. 2

Notice to: *Secretary Forest Environment & Wildlife Deptt*
Chief Secretary

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 30-8-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

along with stay application
Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 31st

Day of July, 2019

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

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

"B"

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

No.

Appeal No. 105 of 20 18 *whereas with stay application*

Dr. M. H. Khan Appellant/Petitioner
Shahzad Banoor Bhatti Respondent
Secretary Respondent
Respondent No. 3 *Dr. Upper*

Notice to: - *Director General Peshawar Forest Institute Peshawar*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 20/8/2018 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

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

Given under my hand and the seal of this Court, at Peshawar this 31st Day of July 2018.

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

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

"A"

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

No.

APPEAL No. 105 of 20 19/8/2019

Dr. Muhammad Naveez Khan
Appellant/Petitioner

Versus

Chief Executive Officer
RESPONDENT(S)

Notice to Appellant/Petitioner

5. Counsel Mr. Poor Muhammad
Handwritten notes and signatures

Handwritten signature

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 30-8-2019 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.

Handwritten signature
19/8/2019

Handwritten signature
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 105/27-2019

Dr. Muhmamad Nawaz Rajpar, Ex-Lecturer in Forestry (BPS-17)
Pakistan Forest Institute (PFI), Peshawar

.....**APPELLANT**

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Civil Secretariat, Peshawar & others
2. The Secretary, Forestry, Environment & Wildlife Department, Government of Khyber Pakhtunkhwa
3. The Director General, Pakistan Forest Institute, Peshawar

.....**RESPONDENTS**

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BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service appeal No. ~~405~~/2019

Dr. Muhmamad Nawaz Rajpar, Ex-Lecturer in Forestry (BPS-17)
Pakistan Forest Institute (PFI), Peshawar

..... **APPELLANT**

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Civil Secretariat, Peshawar & others
2. The Secretary, Forestry, Environment & Wildlife Department, Government of Khyber Pakhtunkhwa
3. The Director General, Pakistan Forest Institute, Peshawar

..... **RESPONDENTS**

PARAWISE COMMENTS ON BEHALF OF RESPONDENT No. 1,2 & 3

Respectfully Sheweth:

Preliminary Objections:

1. That the appellant has no legitimate cause of action.
2. That the appellant has no locus standi to file instant appeal.
3. That the appellant has not come to the Hon'ble Khyber Pakhtunkhwa Service Tribunal, with clean hands.
4. That the appellant has not exhausted the available remedies before approaching the Tribunal i.e. Departmental Appeal and as the appellant has been penalized under Khyber Pakhtunkhwa Government Servants Efficiency & Disciplinary Rules, 2011.
5. That the appeal is not maintainable due to mis-joinder and non-joinder of necessary parties.

FACTS

1. Pertains to record hence needs no comments.
2. Correct to the extent that Pakistan Forest Institute (PFI), Peshawar nominated Dr. Muhammad Nawaz Rajpar (**Appellant**), Technical Assistant (BS-16), PFI for M.Sc Forestry course session 2002-2004 in Forest Education Division, PFI, Peshawar, on Government expenditure. After successful completion of the said course (M.Sc Forestry) the appellant was nominated for Ph.D studies in Wildlife Management at University of Putra of Malaysia, under a PSDP Project (Forestry Sector Research and Development Project) PFI, Peshawar for a period of three years w.e.f. 07-07-2006 to 06-07-2009 and relieved him from duty vide notification dated 7th July, 2006 (**Annex-A**). In this regard, the appellant furnished surety bond / undertaking of Rs. 2.040 million (Rs. Twenty lacs and forty thousands only), that upon, on completion Ph.D study, he shall return to Pakistan and serve for a period not less than five years in any suitable post at PFI,

Peshawar (**Annex-B**). During the said Ph.D the appellant was selected / appointed against the post of Lecturer in Forestry (BPS-17) at PFI, Peshawar vide Ministry of Environment, Islamabad's notification dated 15-12-2007 (**Annex-C**). Later on, the competent authority, on the request of the appellant extended his deputation / study period for another one year w.e.f. 07-07-2009 to 06-07-2010 vide letter dated 27-04-2010 (**Annex-D**).

3. Incorrect. That the appellant, after doing his Ph.D from University of PUTRA, Malaysia, on government expenditure, joined his duty at PFI, Peshawar on 05-10-2010 (**Annex-E**). However, on 04-06-2012 he left the Department by submitting an application for grant of 5 days casual leave w.e.f. 04-06-2012 without prior approval / sanction of leave followed by submitting three further consecutive applications for grant of one month leave on (medical ground) w.e.f. 09-06-2012, 120 days earned leave w.e.f. 13-12-2012 and for one year leave w.e.f. 01-09-2012 (**Annex-F**). Leaves applied for were not granted due to exigency of his service (**Annex-G**). The appellant was directed to report for duty at PFI immediately vide this office letter dated 04-06-2012 followed by a series of reminders, but he did not comply with the orders and remained absent from duty. Whereas, in term of clause 3 of surety bond / undertaking, it has been mentioned that upon the completion of terms of fellowship / scholarship he shall return to Pakistan and serve Government of Pakistan / PFI for a period not less than 05 years in any suitable post at PFI, Peshawar. In case of failure, he is liable to pay a sum of Rs. 2.040 million to the Government of Pakistan / PFI, Peshawar.
4. Incorrect. That the appellant submitted an application dated 31-12-2011 for grant of NOC to apply for the post of Deputy Director Park (BPS-18) in Sindh Wildlife Department, Government of Sindh, which was regretted by this department vide letter dated 13-01-2012 and was informed that hence, he is under bond, therefore unless and until he discharge his bond liability, NOC could not be granted to him (**Annex-H**). The appellant submitted another application dated 12-08-2014 for grant of NOC to apply for the post of Consultant (Wildlife) BPS-20, in Sindh Wildlife Department, Government of Sindh, which was also regretted for the same reason vide letter dated 30-09-2014 (**Annex-I**). Whereas, in the meanwhile, a report also received that the appellant had been working in Sindh Wildlife Department against the post of Consultant (Wildlife) BPS-20 (**Annex-J**), without informing or getting NOC from the competent authority, which led him guilty of "misconduct". Later on, Administrative Department granted him NOC for engagement as Consultant (Wildlife) in Sindh Wildlife Department subject to ***the condition of depositing the outstanding liability of surety bond amounting of Rs. 2.040 million in three installments and also shall not claim the payment of any amount or arrears on account of salary, leave salary or any other emoluments / benefit for the period of his unauthorized absence from duty at PFI, Peshawar vide letter dated 16-06-2016 (Annex-K)***. As per condition of the NOC the appellant was liable to pay the first installment of his surety bond amount of

Rs. 6,80,000/- (Six lac & eighty thousands) on 30-08-2016, which he did not deposit till date and he violated the said agreement.

5. Incorrect. That Government of Sindh, Forest & Wildlife Department prior to expiry of his contract period repatriated the appellant and directed him to report to his parent department (PFI, Peshawar) for duty with immediate effect vide notification dated 30-09-2016 (**Annex-L**), however the appellant submitted his arrival report on 21-12-2016 i.e. after 2 months and 20 days to Administrative Department (FE&WD) with copy to Director General, PFI for information (**Annex-M**). Whereas, being permanent employee of PFI, Peshawar he was required to join PFI in pursuance with the above said notification immediately, but he merely relied on submitting copy of his arrival report to Administrative Department rather than to join duty at PFI, Peshawar. Later on, Administrative Department with the advice of Regulation Wing, Establishment Department, Khyber Pakhtunkhwa, on his repatriation placed his services at the disposal of Director General, PFI, w.e.f. 20-04-2017, and he assumed the charge in PFI on 5-6-2017 after laps of 45 days.
6. Incorrect. That on repatriation of the services of the appellant, he assumed duty at PFI on 05-06-2017 (after a lapse of 45 days of his repatriation notification). However, the PFI processed the case with Administrative Department for issuance of pay slip and on the direction of Administrative Department, PFI also submitted his personal file, service statement, pay bills, leave account and last degree verified from the university. However, soon after it was reported by the Director, Forest Education Division, PFI, Peshawar that the appellant is absent again from duty with effect from 08-08-2017, without prior approval / permission or information to the authority. So the PFI directed appellant vide letter dated 05-09-2017 and dated 29-08-2017 to report for duty, but despite of that he remained absent from his duty. Consequently, the PFI submitted report to Administrative Department, regarding his absence vide letter dated 05-10-2017. Therefore, salary slip was not issued.
7. Incorrect. That the appellant did not apply through proper channel for the post of Assistant Professor in Shaheed Benazir Bhutto University Sheringal, Dir, Upper, which was required under West Pakistan (Application for posts) Rules 1957.
8. Incorrect. That in light of surety bond, furnished by the appellant, he was bound to serve PFI for the period not less than five years in any suitable posts as per surety bond but the appellant had failed to serve in PFI, therefore, the disciplinary proceedings against the appellant was initiated under Government of Khyber Pakhtunkhwa, Civil Servants (E&D) Rules, 2011 and the competent authority constituted an Inquiry Committee vide notification dated 02-11-2017 (**Annex-N**). The Inquiry committee fixed the date of hearing on 15-12-2017 vide letter dated 07-12-2017. But appellant did not appear before the committee on the said date. He was given another chance with the direction to submit reply and appear before the committee on 22-12-2017. The appellant again failed to appear before the committee, and later on, he submitted reply

to the charge sheet and statement of allegations on 03-01-2018 and appeared before the committee on the said date. Consequently, the competent authority on the findings of the inquiry committee and other relevant papers / documents, served upon Show Cause Notice of removal from service tentatively (**Annex-O**). In response, the officer concerned submitted reply to the show cause notice on 26-04-2017, wherein he requested to give him a chance of personal hearing. In this regard, the competent authority has given opportunity of personal hearing which was fixed on 17-07-2018. But the appellant did not attend the personal hearing on the prescribed date. Later on, on the request of the appellant, the competent authority gave him another date of personal hearing on 30-07-2018, which he attended accordingly.

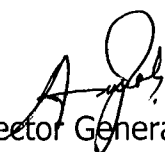
9. Incorrect. Proper inquiry was conducted against the appellant under (E&D) Rules, 2011 and after fulfillment of all codal formalities as explained in para-8 above and the competent authority under Rule-14(5)(ii) read with Rule 4(1)(b)(iii) and Rule-4 (1)(a)(iii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, imposed major penalty of Removal from Service upon the appellant alongwith recovery of an amount of Rs.2.04 million, incurred on the appellant's study / course out of Government expenditure, for acquiring his Ph.D Degree, from abroad in Wildlife Management (**Annex-P**).
10. Incorrect. That the Hon'ble PHC directed the Departmental Authority to decide the departmental appeal one way or the other strictly in accordance with law as early as possible but not later than one month, after receipt of this office order and till then, no recovery shall be effected from the petitioner in pursuant to impugned notification. In light of the said judgment, the appeal of the petitioner has been considered / examined properly and rejected by the Appellant Authority being no force (**Annex-Q**).
11. No comments

GROUND

- A. Incorrect. That the notification dated 20-08-2018 issued by the competent authority is according to the prescribed rules and law and is not liable to be set aside.
- B. Incorrect. That the appellant has been treated accordance with the prescribed rules and law and provided additional chances for attending inquiry / personal hearing.
- C. Incorrect. As explained in para-A above of the ground.
- D. Incorrect. As explained in para-A above of the ground.
- E. Incorrect. As explained in para-A above of the ground.
- F. Incorrect. That in the instant case all the codal / legal formalities have been adopted and additional chances of personal hearing have also been given to the appellant, therefore, notification dated 20-08-2018, is not liable to be set aside and is as per law.
- G. Incorrect. As explained in para-2 of facts.
- H. Incorrect. As explained in para-2 of facts.
- I. Incorrect. As explained in para-8 of facts.


J. Incorrect. As explained in para-8 of facts.

In view of the above, it is humbly prayed that instant appeal, being devoid of merit, may please be dismissed in limine, with cost.


Director General
Pakistan Forest Institute,
Peshawar

Respondent No. 3

Almas 1


Secretary,
Government of Khyber Pakhtunkhwa
Forestry, Environment & Wildlife Department

Respondent No.2


Chief Secretary,
Government of Khyber Pakhtunkhwa

Respondent No.1

TO BE PUBLISHED IN THE NEXT ISSUE OF GAZETTE OF PAKISTAN PART-III.

Office of the Director General
Pakistan Forest Institute
Peshawar

Dated

7th July, 2006

60
300
Annex A

NOTIFICATION

No. 2850 /GS.III(12)FSRD Project, In pursuance of Government of Pakistan Ministry of Environment Islamabad letter No. F-4-2/03-F-III dated June 23, 2006 read with letter no. F-4-2/03-F-III dated 6th July, 2006 Mr. Muhammad Nawaz Rajpar, Technical Assistant (BPS-16) of the Pakistan Forest Institute, Peshawar is hereby relieved of his duties in the afternoon of 7th July, 2006 to proceed for three years Ph.D. studies in the Wildlife Management at University PUTRA, Malaysia on the usual terms and conditions.

Dr. Raza-Ul-Haq
Director General

To
The Manager
Printing Corporation of Pakistan Press
University Road, Karachi

No. 2851-55 /F-4-2/03-F-III

Dated

7th July, 2006

A copy is forwarded to:

1. Inspector General of Forest, M/o Environment, Islamabad
2. Syed Ahmed Raza Asif, Section officer (F-III), M/o Environment, Islamabad with reference to his letter No. F-4-2/03-F-III, dated 6th July, 2006.
3. AGPR Sub-Officer Peshawar.
4. Director Biological Sciences Research Division
5. Mr. Muhammad Nawaz Rajpar, Technical Assistant PFI, Peshawar.
6. Administrative Officer (B&A) PFI, Peshawar

Director General

Administrative Officer (G)
Pakistan Forest Institute
Peshawar

306
Annex-B

SURETY BOND

Memorandum of agreement between Muhammad Nawaz Rajpar and the President of Pakistan made this 3rd June, 2006. Where as Muhammad Nawaz Rajpar at present employed as Technical Assistant, Forest Entomology Branch, Pakistan Forest Institute, Peshawar (referred to as the fellow/scholar which expression shall include heirs, successors and legal representative) of the first part as a result of sponsoring by the President of Pakistan, herein after referred to as the president, which expression shall include his success or in office of the other part, has been awarded a fellowship/scholarship, in the field of Wildlife Management by the government of Pakistan under Forestry sector Research And Development Project.

Now therefore, in consideration for the said award, fellow/scholar agrees and undertake as follows;

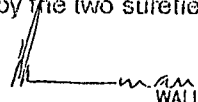
- i. He shall faithfully confirm to and abide by the institutions issued with regard to his studies by the offering country/organization during the period of his fellowship and shall wholeheartedly and diligently engage himself in the studies, training and research work pertaining to the fellowship/scholarship abroad and shall take tests and examinations and may be prescribed.
- ii. He shall confine his studies to the aforesaid field and shall not exchange it without prior permission of the President
- iii. Upon the completion of terms Fellowship/Scholarship he shall return to Pakistan and serve President of Pakistan for a period not less than five years in any suitable post at the Pakistan Forest Institute, Peshawar of which the President shall be sole judge and upon such terms and conditions as the President may prescribe.
- iv. Upon the return from abroad he shall have no right to claim higher pay or seniority over others on account of the said training.
- v. In the event of the breach of any of aforesaid terms not arising from his illness certified to the satisfaction of the President, the fellow/scholar binds himself firmly to pay on demand as sum of Rs 2.040 million Rupees
Two million rupees & forty thousand

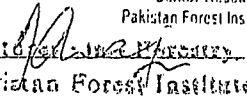
In witness where of he produces below two sureties who shall be responsible and stands bound by this agreement and guarantees that the fellow/scholar shall be fails to do so, the sureties shall identify and pay to the President the said amount in default of payment by the fellow/scholar.

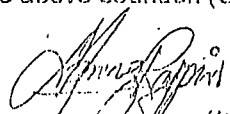
And we the sureties below agree and guarantee for the performance of promises that fellow/scholar and for the payment of the said amount in default.


Signed by the two sureties

Signed by the above bounden (Candidate)

1. 
WALI-UR-REHMAN
Senior Research Officer
Pakistan Forest Institute, Peshawar.

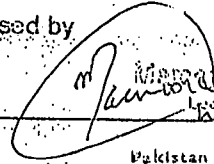
2. 
Muhammad Nawaz Rajpar
Pakistan Forest Institute
Peshawar.

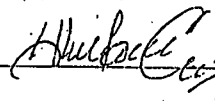

(Muhammad Nawaz Rajpar)
Technical Assistant
Pakistan Forest Institute
Peshawar.


Administrative Officer (G)
Pakistan Forest Institute
Peshawar

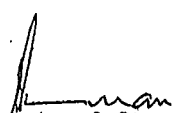
Annex - B
307
I

Witnessed by

1. 
M. Javed
In-charge
Forest College
Pakistan Forest Institute Peshawar

2. 
GHULAM ALI BAJWA
Senior Research Officer
(Silvoprom Pathology)
Pakistan Forest Institute
Peshawar


Certified that both the above sureties are solvent and in position to pay the President the sum of R.s. 2.40 million (Rupees Two million and forty thousand) in terms of the agreement.


Signature & Stamp
MICWALQUR BEHMAN
Senior Research Officer
Pakistan Forest Institute, Peshawar.

Foot Note

Here insert one of the following amounts applicable to the case;

- I. where the training period is six month or less Rs. 15000/=
- II. where training period exceeds six month but does not exceeds one year Rs. 20000/=
- III. where training period exceeds one year but does not exceeds two year Rs. 30000/=
- IV. where training period exceeds two year but does not exceeds three year Rs. 40000/=
- V. A Candidate have to pay the actual amount incurred on training.


Administrative Officer (G)
Pakistan Forest Institute
Peshawar

UNDERTAKING

I Muhammad Nawaz Rajpar s/o Muhammad Hashim Rajpar undertake that:

- i. I will make my self available to present for training as when required by the aid giving agency and as directed by Government.
- ii. I will conduct my self at all times in the manner compatible with the status as a fellowship holder.
- iii. I will devote my full time to the training program as directed by the supervising agency in the country of training.
- iv. I will not make any correspondence with foreign authority except on the routine matters.
- v. I will not hesitate to do any practical work or manual labour which I may be required to do as a part of my training.
- vi. I will refrain from engaging in any political, commercial or any other activity in compatibles with my work program.
- vii. I will not incur any debates during the training period and will clear all outstanding bills before leaving the country of training.
- viii. I will not seek domicile in the foreign country and will return to Pakistan immediately after training.
- ix. I will submit such periodical reports may be required by the training authority during the period of my training and will submit to that authority of final report immediately on completion of training.
- x. I will also submit such report as may be required by the government after I have come back from the training.
- xi. I have not applied for any other foreign training and shall also inform the government if I apply for any training subsequent to my application for this training.
- xii. I declare that I have not been abroad for training under any add program.

[Signature]
 Signature of Witness
 Class - 4
 Peshawar

[Signature]
 Signature of Muhammad Nawaz Rajpar
 Address: Forest Institute
 Branch: PFI Peshawar
 Pakistan

Note: A candidate training will be liable to the following disciplinary actions;

- a) If he fails to avail of a training awards he will be debarred the government for training under any other technical assistance proper unless gives an examination satisfactory to the government for his failure to avail of the training award.
- b) In case of disobedience of government order directing a schioarship/fellowship holder to return to Pakistan action will be taken under the passport act, 1962 or initiating or confiscation the passport of the trainee.

[Signature]
 Administrative Officer (G)
 Pakistan Forest Institute
 Peshawar

TO BE PUBLISHED IN PART-I
OF THE GAZETTE OF PAKISTAN

GOVERNMENT OF PAKISTAN
MINISTRY OF ENVIRONMENT

Islamabad, the 15th December, 2007

NOTIFICATION

No. 1(23)/2007-A-III (PFI). In pursuance of Federal Public Service Commission letter No. F. 4-40/2007-R-FS-I, dated 23rd August, 2007. Mr. Muhammad Nawaz Rajpar, is appointed as Lecturer in Forestry, (BPS-17) (8210-815-20510) in Pakistan Forest Institute, Peshawar w.e.f. 14-09-2007.


2. He will remain on probation for a period of one year.

(Muhammad Zahid Mustafa)
Section Officer (Admn-III)

The Manager,
Printing Corporation of Pakistan Press,
KARACHI.

Copy to:

1. AGPR, Sub Office, Peshawar.
2. Mr. Sarwat Habib, Deputy Director, FPSC with reference to their letter No. F. 4-40/2007-R-FS-I, dated 23rd August, 2007.
3. P.S to Secretary, Ministry of Environment.
4. P.A to Joint Secretary, (Admn) Ministry of Environment.
5. Director General, Pakistan Forest Institute, Peshawar.
6. Superintendent (B&C).
7. Officer Concerned.
8. Personal File.


Administrative Officer (G)
Pakistan Forest Institute
Peshawar

Annex-D



Government of Pakistan
Ministry of Environment
Pakistan Forest Institute, Peshawar
Ph: +92 91 9216123, Fax: +92 91 9216203



No. 698 / F.II (136)-Estt. Dated 27-4-2010

To
Mr. Muhammad Nawaz Rajpar
Ph. D Student
Faculty of Forestry
University of PUTRA
Malaysia


Subject: Training Abroad for Ph. D Programme


Reference: Your application, dated 20-04-2010 and 12-02-2010

It is to inform you that the competent authority in Ministry of Environment has been pleased to approve extension in your deputation for study abroad for a period of one year 07-07-2009 to 06-07-2010, subject to the following conditions:

1. The expenses on your extended study period will be borne within the already remitted amount paid to the University.
2. Before issuing notification for grant of extension in deputation period, you should furnish an undertaking to the effect that any additional expenses over and above those provided / sanctioned for your initial study period of three years will be borne by you.

You are hereby directed to submit the requisite undertaking on immediate basis, so that your leave extension could be notified accordingly.


Director General
Pakistan Forest Institute


Administrative Officer (G)
Pakistan Forest Institute
Peshawar

To

To,

Director General
Pakistan Forest Institute
Peshawar, Pakistan

Through: Proper Channel

Subject: JOINING REPORT

Dear/Sir

I was nominated for full time Ph.D Program with Faculty of Forestry at Universiti Putra Malaysia under Forestry Sector Research and Development Project vide letter No: F.1434-43/FSRDP/Trg.TSWS/06 dated 6/2/06. I have finished my study.

It is therefore, I joint my duty as a Lecturer in Forestry today forenoon.

Thanking you in anticipation

Your's Faithfully

(Signature)
05/10/2010
(Dr. Muhammad Nawaz Rajpar)
Lecturer in Forestry
Forest Education Division
Pakistan Forest Institute,
Peshawar

No. 106 IF-Ed(07) Dated 5/10/2010
Forwarded to DC-PFI, Peshawar

(Signature)
05/10/10
DIRECTOR
Forest Education Division,
Pakistan Forest Institute,
Peshawar.

(Signature)
Administrative Officer (G)
Pakistan Forest Institute
Peshawar

(Signature)
05/10/10

AOG/No BSA

156
Sol
6/10/10

To,

The Director
Forest Education Division
RFI, Peshawar

Subject: REQUEST FOR FIVE DAYS CASUAL
LEAVE WITH STATION PERMISSION

Dear Sir,

With due respect, it is stated that I have some domestic problem at my native home. Due to which I am unable to attend the

Administrative Officer (G)
Pakistan Forest Institute
Peshawar

office from 4th June to 8th June, 2012.
Therefore, it is requested that may kindly give me five days casual leave from 4-8 June, 2012 ~~that~~ I with station leave permission. I will ever remain thankful to you and obliged.

Thanking you

Yours faithfully
[Signature]
Dr. M. Nawaz

Dated 4/6/2012

Sanctioned
Respected
Mud
DFED
SF

4/6
8:10

Your class is going on tour on 6th and you have to proceed on 5th to Shinkorail, IR. Your leave is rejected and directed to present yourself usually.



Government of Khyber Pakhtunkhwa
Environment Department

Field of Forestry
siness the Man



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Annex - H



GOVERNMENT OF KHYBER PAKHTUNKHWA
Environment Department
Pakistan Forest Institute, Peshawar

Ph: +92 91 9216123 , Fax: +92 91 9216203



No. 59 /F.II (136)-Estt

Dated 13 January, 2012

To

Dr. Muhammad Navaz Rajpar,
Lecturer in Forestry,
Pakistan Forest Institute,
Peshawar.

SUBJECT: NO OBJECTION CERTIFICATE

P-674

With reference to your application dated 31st December 2011 on the subject noted above, it is to inform you that you are under bond to serve the PFI for a period of 5 years after completion of your Ph.D. Unless and until you discharge your bond liability, NOC can not be granted to you for seeking employment elsewhere.

Deputy Director (Technical)
Pakistan Forest Institute,
Peshawar

Administrative Officer (G)
Pakistan Forest Institute
Peshawar

~~Annex~~
Annex - H



GOVERNMENT OF KHYBER PAKHTUNKHWA
Environment Department
Pakistan Forest Institute, Peshawar

Ph: +92 91 9216123 , Fax: +92 91 9216203



No. 59 /F.II (136)-Estt

Dated 13 January, 2012

To:

Dr. Muhammad Nawaz Rajpar,
Lecturer in Forestry,
Pakistan Forest Institute,
Peshawar.

SUBJECT: NO OBJECTION CERTIFICATE

With reference to your application dated 31st December 2011 on the subject noted above, it is to inform you that you are under bond to serve the PFI for a period of 5 years after completion of your Ph.D. Unless and until you discharge your bond liability, NOC can not be granted to you for seeking employment elsewhere.

P. 674
Deputy Director (Technical)
Pakistan Forest Institute,
Peshawar

[Signature]
Administrative Officer (G)
Pakistan Forest Institute
Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
Environment Department
Pakistan Forest Institute, Peshawar

Ph: +92 91 9216123, Fax: +92 91 9216203



No. 1401 /F.I(Per)-Estt.

Dated 30 / 9 / 2014

To

Mr. Muhammad Nawaz Rajpar,
Bungalow, No. EE16,
Defense View Phase -2,
Near Iqra University,
Qayumabad Campus 2,
Karachi, Sindh.

SUBJECT: REQUEST FOR NO OBJECTION CERTIFICATE FOR THE POST OF CONSULTANT (WILDLIFE) BS-20 IN GOVERNMENT OF SINDH.

I am directed to refer to your application dated 12-08-2014 on the subject and to convey that your request for grant of NOC for joining the post of Consultant in Sindh Wildlife Department has been turned down by the competent authority.

You are hereby directed to report for your duty immediately at PFI, Peshawar.

Deputy Director (Technical)

Cc:

1. Secretary Forest, Government of Sindh, Karachi. A copy of application of Mr. Muhammad Nawaz Rajpar is enclosed herewith. It is evident from his application that he has been inducted in Wildlife Department, Government of Sindh. The officer is under bond to serve PFI. It is therefore requested that the officer may be relieved from his present posting in Sindh Wildlife Department with direction to join his duty at PFI.
2. Joint Secretary (Devolution Cell), Cabinet Division, Islamabad.
3. Section Officer (Devolution Cell), Workers Welfare Building, Super Market, Islamabad.
4. Section Officer (Estt), Environment Department, Government of Khyber Pakhtunkhwa, Peshawar.

Administrative Officer (G)
Pakistan Forest Institute
Peshawar

Annex - J

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GOVERNMENT OF SINDH
FOREST, ENVIRONMENT & WILDLIFE
DEPARTMENT

Karachi, dated the 27th August, 2014

NOTIFICATION

No. SOIII/F&WL/1-2/2013: In pursuance of the Services, General Administration & Coordination Department, Government of Sindh's Notification No. SOII(S&GAD)3-21/2014, dated 15th August, 2014, Dr. Muhammad Nawaz Rajpar, Consultant (Wildlife) Equivalent to BS-20 Sindh Wildlife Department on Contract Basis has assumed the charge of the post of Consultant (Wildlife), Sindh Wildlife Department on 26th August, 2014.

WASIM AHMED URSANI
SECRETARY TO GOVERNMENT OF SINDH

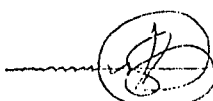
No. SOIII/F&WL/1-2/2013

Karachi, dated the 27th August, 2014

A copy is forwarded to:-


1. Secretary to Chief Minister, Sindh, Karachi.
2. Secretary (Services), Services, General Administration & Coordination Department, Government of Sindh, Karachi.
3. ✓ Accountant General, Sindh, Karachi.
4. Deputy Secretary (Staff) to Chief Secretary, Sindh, Karachi.
5. ✓ Consultant (Wildlife), Sindh Wildlife Department, Karachi.
6. ✓ Conservator Wildlife, Sindh, Karachi.
7. Deputy Conservators Wildlife, Hyderabad / Sukkur.
8. Publisher, Sindh Government Printing Press Karachi for publication in the next issue of Government Gazette.
9. P.S. to Minister for Forests & Wildlife, Sindh, Karachi.
10. P.S. to Secretary, Forest, Environment & Wildlife Department, Govt. of Sindh, Karachi.
11. Personal file.
12. Office order file.

Mr. Hassan
1841


27/8/2014

SECTION OFFICER-I
FOR SECRETARY TO GOVERNMENT OF SINDH

Non-DFO-SDFO (March 2013)


Administrative Officer (G)
Pakistan Forest Institute
Peshawar

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Annex 5

No. FE&WL(SOIII)/1-2/2013
GOVERNMENT OF SINDH
FOREST, ENVIRONMENT & WILDLIFE
DEPARTMENT

Karachi, dated the 16th September, 2014

To,
Dr. Muhammad Nawaz Rajpar,
Consultant (Wildlife),
Sindh Wildlife Department,
Karachi.

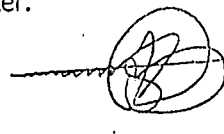
SUBJECT: Submission of N.O.C. from Parent Department Pakistan Forest Institute, Peshawar.

Reference: Director General, PFI, Peshawar's letter No. 302/F.II(136)-Estt, dated 4th March, 2014 (copy enclosed).

I am directed to refer to the subject noted above and to state that as per C.V. submitted by you, you are regular employee of Pakistan Forest Institute, Peshawar, hence, as per rules in practice you were required to furnish NOC from your Parent Department i.e. Pakistan Forest Institute (PFI), Peshawar which you have failed to submit as yet.

2/- You are, therefore, requested to furnish the requisite NOC from PFI, Peshawar within a fortnight for further continuance in Wildlife Department as a Consultant, failing which your services shall be liable to terminate.

3/- Please acknowledge the receipt of this letter.

 16/9/2014

SECTION OFFICER-I
FOR SECRETARY TO GOVT. OF SINDH

CC to:-

- Secretary (Services), Services, General Administration & Coordination Department, Government of Sindh, Karachi.
- Deputy Secretary (Staff) to Chief Secretary, Sindh, Karachi.
- ✓ Conservator Wildlife, Sindh, Karachi.

SOI


Administrative Officer (G)
Pakistan Forest Institute
Peshawar



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GOVERNMENT
FOREST, ENVIRONMENT
DEPARTMENT

Annex - J

IFE

Karachi, dated the 25th August, 2014.

NOTIFICATION

No. SOIII/F&WL/1-2/2013: With the approval of the Competent Authority, Dr. Muhammad Nawaz Rajpar, Consultant (Wildlife) Equivalent to BS-20 Sindh Wildlife Department on Contract Basis vide Notification No. SOII(S&GAD)3-21/2014, dated 15th August, 2014 is hereby allowed to assume the charge of the post of Consultant (Wildlife), Sindh Wildlife Department with immediate effect and until further orders.

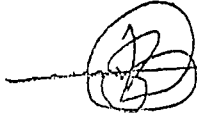
WASIM AHMED URSANI
SECRETARY TO GOVERNMENT OF SINDH

Karachi, dated the 26th August, 2014

No. SOIII/F&WL/1-2/2013

A copy is forwarded to:-

- Mr. Hashim
Mr.
1. Accountant General, Sindh, Karachi.
 2. Deputy Secretary (Staff) to Chief Secretary, Sindh, Karachi.
 3. Chief Conservator of Forests, Sindh, Hyderabad.
 4. Consultant (Wildlife), Sindh Wildlife Department, Karachi.
 5. Conservator Wildlife, Sindh, Karachi.
 6. Deputy Conservators Wildlife, Hyderabad / Sukkur.
 7. P.S. to Minister for Forests & Wildlife, Sindh, Karachi.
 8. P.S. to Secretary (Services), Services, General Administration & Coordination Department, Government of Sindh, Karachi.
 9. P.S. to Secretary, Forest, Environment & Wildlife Department, Govt. of Sindh, Karachi.
 10. Officer concerned.
 11. Personal file.
 12. Office order file.


SECTION OFFICER-I
FOR SECRETARY TO GOVERNMENT OF SINDH

1838
29-8-

Not-DFO-SDFO (March 2013)


Administrative Officer (G)
Pakistan Forest Institute
Peshawar

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Diary No. 337
Date: 24/6/16
Section:



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
NO.SO(Estt)/FE&WD/I-1/2K14/PF
Dated Pesh: 16th June, 2016

Annex - K

To

The Secretary to Government of Sindh,
Forestry Environment & Wildlife Department,
Karachi.

SUBJECT: NO OBJECTION CERTIFICATE/PAYMENT OF SURETY BOND AMOUNTING TO
RS.2.04 MILLION IN THREE INSTATMENTS.

Dear Sir,

I am directed to refer to the application dated 6.6.2016 received through
Director General, Pakistan Forest Institute, Peshawar letter No.960/F.I(Per)Estt dated
6.6.2016 on the above captioned subject and to state that the Provincial Government of
Khyber Pakhtunkhwa in Forestry Environment and Wildlife Department has no objection to
the engagement of Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry, Pakistan Forest
Institute, Peshawar by the Government of Sindh as Consultant Wildlife Department subject
to the following:-

1. Payment of Surety Bond amounting to Rs. 2.04 Million in three equal
instalments as undertaken by the officer on Non Judicial Stamp Paper
executed by him (copies enclosed) and undertakings of the two Forest
Department's Guarantor as per stipulated time lines given below; and

Installment	Amount Rs.	Date of Payment
1st Installment	6,80,000/-	30.08.2016
2 nd Installment	6,80,000/-	30.06.2017
3 rd Installment	6,80,000/-	30.03.2018

2. He shall not claim payment of any amount or arrears on account of salary,
leave salary or any other emoluments/benefits for the period of his
unauthorized absence i.e. from 23.11.2012 till date.

SECTION OFFICER (ESIT)

Encl: No. and date even / 1823 - 32

Copy is forwarded to:-

1. PS to Secretary, Forestry, Environment & Wildlife Department, Khyber Pakhtunkhwa.
2. Secretary to (Services), Services, General Administration & Coordination Department,
Government of Sindh, Karachi.
3. Director General Pakistan Forest Institute Peshawar w/r to his letter
No.960/F.I(Per)Estt dated 6.6.2016
4. Chief Conservator of Forests, Central & Southern Forest Region Peshawar.
5. Director Research & Development, Forest Department.
6. Director Budget & Accounts Cell, FE&W Department.
7. Syed Hasnain Abbas, Deputy Director (Guarantor) R&D Directorate Forest
Department w/r to his Affidavit/undertaking dated 1.6.2016 in the case.
8. Mr. Kuleem Shah, Assistant Director (Guarantor) R&D Directorate Forest Department
w/r to his Affidavit/undertaking dated 1.6.2016 in the case.
9. Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry, Pakistan Forest Institute,
Peshawar, w/r to his above referred application dated 6.6.2016

23/6/16 DGT
AD(S)

23/6/16

SECTION OFFICER (ESIT)

Administrative Officer (G)
Pakistan Forest Institute
Peshawar



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**GOVERNMENT OF SINDH
FOREST & WILDLIFE DEPARTMENT**

Annex - 1

Karachi, dated the 30th September, 2016

S 33
26/10/16

NOTIFICATION

NO:FT&WL(SOI)5(1)/2016 With the approval of Competent Authority (i.e Chief Secretary, Sindh), Dr. Muhammad Nawaz Rajpar, Consultant (BS-20), Sindh Wildlife Department, with effect from 15th August, 2014 to 14th August, 2016 on contract basis for a period of two years is hereby repatriated / relieved and directed to report to his parent department i.e Pakistan Forest Institute Peshawar with immediate effect and until further orders.

SECRETARY TO GOVERNMENT OF SINDH

Karachi, dated the 30th September, 2016

NO:FT&WL(SOI)5(1)/2016

A copy is forwarded to: -

- Accountant General, Sindh, Karachi.
- Secretary, Forestry, Environment & Wildlife Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
- Secretary, Finance Department, Government of Sindh, Karachi.
- Deputy Secretary (Staff) to Chief Secretary, Sindh, Karachi.
- Conservator Wildlife, Sindh, Karachi.
- P.S. to Secretary (Services), Services, General Administration & Coordination Department, Government of Sindh, Karachi.
- P.S. to Secretary, Forest & Wildlife Department, Govt. Sindh, Karachi.
- Officer concerned.

30/9/2016

**SECTION OFFICER-I
FOR SECRETARY TO GOVT. OF SINDH**

**Administrative Officer (G)
Pakistan Forest Institute
Peshawar**

24/10/16
DPT/DFED

24/10/16
DFED/AO(G)

To

The Secretary
Forest, Environment & Wildlife Departments
Govt. of Khyber Pakhtunkhwa,
Peshawar

Subject: ARRIVAL REPORT

Dear Sir,

With due respect, it is stated that Secretary Forest & Wildlife, Govt Sindh has repatriated my services and gave directive to report my name department vide notification NO.FEWA (SO1)5(1)2016.

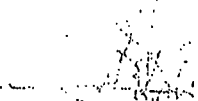
Sir, I give my arrival today afternoon on my previous post as lecturer forestry. It is therefore, humbly requested that may kindly accept my arrival, this will ever remain thankful to you and oblige so.

Thanking for anticipation

Dated 21/12/2016

Your's Sincerely,


Administrative Officer (G)
Pakistan Forest Institute
Peshawar


Dr. Rajpar Muhammad Nawa
Lecturer in Forestry
P.F.I. Peshawar

Copy to:

- 1. Director General, Pakistan Forest Institute Peshawar

Handwritten notes:
21/12/16
M

Handwritten notes:
in his name
was not listed

Handwritten note:
He has not reported at the office yet.



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

Dated Pesh: the 2nd November, 2017

Amrtes - N

NOTIFICATION

No. SO (Estt) FE&WD/V-1/2k14 / 22-11-17
An Enquiry Committee comprising Mr. Junaid Khan, (PMS BS-18) Director General, Sports Department (as Convener) and Mr. Shafqat Munir, Divisional Forest Officer (BS-18)/Conservator of Forests, Southern Circle, Peshawar (as Member) is constituted by the competent authority to conduct inquiry under the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011 against Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry (BS-17), Pakistan Forest Institute Peshawar, for the charges/allegations leveled against him in the charge sheet and statement of allegation.

2. The Enquiry Committee shall submit its findings within stipulated period of 30 days positively.

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Dated Pesh: the 2nd November, 2017

Endst: No. SO (Estt) FE&WD/V-1/2k14:

A Copy of the charge sheet alongwith statement of allegation is forwarded for further necessary action to:-

- 1) Mr. Junaid Khan, (PMS BS-18) Director General, Sport Department, (as Convener).
- 2) Mr. Shafqat Munir, DFO/Conservator of Forests, (BS-19 OPS) Southern Circle, Peshawar (as member).
- 3) The accused officer C/O Director General, Pakistan Forest Institute Peshawar with the direction to appear before the Enquiry Committee on the date, time and place to be fixed by the Enquiry Committee for the purpose of inquiry proceeding.
- 4) PS to Secretary, FE&W Department, Khyber Pakhtunkhwa for information.

(MAQBOOL HUSSAIN)
SECTION OFFICER (ESTT)

Pls send these documents to Mr. Rajpar for enquiry
22/11/17

22/11/17

AR (G) / DFE

7
Pls send letter to Mr. Rajpar in information of copy to D. Rajpar as this file is with E&W PFI

[Signature]
Administrative Officer (G)
Pakistan Forest Institute
Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

NO.SO(Estt)/FE&WD/V-1/2014/PF
Dated Peshawar the, 11th April, 2018

Annex - ①

Most Immediate
Through Fax

To
Muhammad Nawaz Rajpar,
Lecturer in Forestry (BS-17),
Pakistan Forest Institute,
Peshawar.

C/o Director General,
Pakistan Forest Institute,
Khyber Pakhtunkhwa,
Peshawar.

Subject: - **SHOW CAUSE NOTICE**

I am directed to refer to the subject captioned above and to enclose herewith Show Cause Notice (in duplicate) alongwith findings of the inquiry report with the request that reply to the show cause notice may be furnished to this department through Director General, Pakistan Forest Institute, Peshawar **within seven (07) days** positively for further necessary action.

2) Please acknowledge the receipt.

Encl: As above

(Signature)
(TARIQ JAMAL)
SECTION OFFICER (ESTT)

Endst: No: & date even

Copy is forwarded to:-

1. Director General, Pakistan Forest Institute, Peshawar. He is requested that on receipt of reply to the show cause notice from the accused, comparative statements with comments of the department (in annotated form) may be furnished to this department within stipulated period for further course of action.
2. PS to Secretary, FE&W department, Khyber Pakhtunkhwa for information.

for m/a Pk
11/04/18
SECTION OFFICER (ESTT)

DDT

(Signature)
Administrative Officer (G)
Pakistan Forest Institute
Peshawar

Annex-0



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIORNMENT & WILDLIFE DEPARTMENT

SHOW CAUSE NOTICE

I, Muhammad Azam Khan, Chief Secretary, Khyber Pakhtunkhwa as Competent Authority, under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, Dr. Muhammad Nawaz Rajpar, Lecturer in Forestry (BS-17), Pakistan Forest Institute, Peshawar as follows:-

- (i) That consequent upon the completion of the inquiry conducted against you by the Inquiry Committee for which you were given opportunity of hearing vide office communication No: SO (Estt)/F&WD/V-1/2014/3602-05, dated 02nd November, 2017;
- (ii) On going through the findings and recommendations of the Inquiry Committee, the material on record and other connected papers including your defence before the Inquiry Committee.

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

- a) Inefficiency
- b) Misconduct

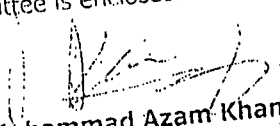
2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of Dismissal from service

_____ under
_____ Rule-4 of the said Rules.

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

4. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

5. A copy of the findings of the Inquiry Committee is enclosed.


(Muhammad Azam Khan)
Chief Secretary,
Khyber Pakhtunkhwa/
Competent Authority


Administrative Officer (G)
Pakistan Forest Institute
Peshawar

Annex - D

**GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
DATED PESHAWAR THE, 20TH AUGUST, 2018**

NOTIFICATION

8671-77/

No. SO (Estt) FE&WD/V-1/2016: WHEREAS, Dr. Muhammad Nawaz Rajpar, Lecturer (BS-17) Pakistan Forest Institute (PFI), Peshawar was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, for the charges as mentioned in the Charge Sheet and Statement of Allegations served upon him;

AND WHEREAS, the Enquiry Committee comprising Mr. Junaid Khan (PMS BS-18), Director General, Sports Department and Mr. Shafqat Munir, Divisional Forest Officer (BS-18)/Conservator of Forests, Southern Circle, Peshawar was constituted to conduct inquiry against the said officer;

AND WHEREAS, the Enquiry Committee, after having examined the charges, evidence on record and explanation of the officer, submitted its report, wherein the charges against the officer have been established beyond reasonable doubt;

AND WHEREAS, the Competent Authority, after considering the inquiry report and other related documents of the case, served a Show Cause Notice upon the above named officer to which he replied, and provided him opportunity of personal hearing;

NOW, THEREFORE, the Competent Authority, after having considered the charges, evidence on record, findings/recommendations of the Enquiry Committee, the explanation of the officer, personal hearing and exercising his powers under Rule-14(5)(ii) read with Rule 4(1)(b)(iii) and Rule-4(1)(a)(iii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, has been pleased to impose major penalty of "Removal from Service" upon Dr. Muhammad Nawaz Rajpar, Lecturer (BS-17) Pakistan Forest Institute (PFI), Peshawar and "Recovery of an amount of Rs.2.04 Million" from him, spent on the officer out of Govt. expenditure for acquiring his PhD Degree from abroad in Wildlife Management, with immediate effect.

**CHIEF SECRETARY
GOVT. OF KHYBER PAKHTUNKHWA**

No. SO (Estt) FE&WD/V-1/2016:

Dated Peshawar the, 20th August, 2018

Copy is forwarded to:-

- 1) Director General, Pakistan Forest Institute, Peshawar. He is requested to formulate a proper mechanism for recovery of the penalty amount either from the Ex-Lecturer, PFI or sureties i.e. Ayaz Khan, Senior Research Officer (BS-18), PFI and Nowsherwan Zarif, Assistant Silviculturist (BS-17), PFI as per the Surety Bond.
- 2) Director Budget and Accounts Environment Department for similar necessary action.
- 3) Dr. Muhammad Nawaz Rajpar, Lecturer, PFI C/O DG, PFI.
- 4) Programmer, B&A Cell, FE&W Department.
- 5) PS to Secretary, FE&W Department, Khyber Pakhtunkhwa.
- 6) Master file.
- 7) Office order file.

(Signature)
(Mafiz Abdur Jalil)
SECTION OFFICER (ESTT)

for compliance n/a pls.

24/08/18 *DP(T)* *Munir*
26/09/18

Az(S)

(Signature)
Administrative Officer (G)
Pakistan Forest Institute
Peshawar

Annex-2



**GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT**

**NO.SO(Estt)/FE&WD/V-1/2014/PF
Dated Peshawar the, 16th May, 2019**

To

Dr. Muhammad Nawaz Rajpar,
Ex Lecturer in Forestry (PFI).

C/o

Director General,
Pakistan Forest Institute,
Khyber Pakhtunkhwa,
Peshawar.

Subject: - DEPARTMENTAL APPEAL AGAINST NOTIFICATION DATED 17-09-2018


I am directed to refer to your appeal/representation dated 01st October, 2018 on the subject captioned above and to say that your subject appeal/representation has been considered and rejected by the Appellate Authority.



(HAFIZ ABDUL JALIL)
SECTION OFFICER (ESTT)

Endst: No: & date even

Copy is forwarded for information to:-

1. Director General, Pakistan Forest Institute, Peshawar w/r to his letter No: 1358/F.I (Per)-Estt, dated 22nd November, 2018. **He is requested to ensure that the letter in question may be delivered to the appellant on his home and official addresses.**
2. PS to Secretary, FE&W Department, Khyber Pakhtunkhwa.


SECTION OFFICER (ESTT)


**Administrative Officer (G)
Pakistan Forest Institute
Peshawar**

The Director General
Pakistan Forest Institute
Peshawar

through: Proper Channel

Subject: REQUEST FOR LEAVE ON MEDICAL GROUNDS

Respected Sir,

With due respect and humble request, I have some severe domestic problem i.e. scuffle with other family members, due to which I am unable to work properly. Furthermore, Sir, I have some medical issues which are not yet fully resolved.

It is therefore, requested that my leave may kindly be granted on compassionate grounds in view of the sensitivity of my domestic health problems being resident of Sindh. I may kindly be granted leave from 15/07/2013 to 30/07/2013. I will ever remain thankful to you.

Signature
Muhammad Nadeem Khan
Lecturer in Forestry
PFI, Peshawar

Signature
Administrative Officer (G)
Pakistan Forest Institute
Peshawar