

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service appeal No.664/2022

Shah Zada

.....Appellant

Versus

Government of Khyber Pakhtunkhwa & others

.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Rejoinder alongwith affidavit		1-7
2.	Copies of abstracts of Raseed Rahdari dated 14.10.2022 & 02.11.2021 and affidavits of Mujahid Khan and Umar Khan	A,B C & D	8-11
3.	Copies of the final seniority list as it stood on ^{30.09.2019 &} 31.07.2021 & Judgment dated 10.01.2019	E&F & G	12-23

Appellant

Through

Yasir Saleem

&

Yousaf Orakzai
Advocates High Court
Peshawar.

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service appeal No.664/2022

Shah Zada, District Public Prosecutor (BPS-19) District Bajaur

.....Appellant

Versus

1. Government of Khyber Pakhtunkhwa, through its Chief Secretary, Civil Secretariat, Peshawar.
2. Secretary to the Government of Khyber Pakhtunkhwa, Home and Tribal Affairs Department, Civil Secretariat, Peshawar.
3. Director General Prosecution, Khyber Pakhtunkhwa, Peshawar.

.....Respondents

REJOINDER ON BEHALF OF APPELLANT

1. That the appellant has got cause of action to file the instant appeal as well as rejoinder.
2. That the service appeal is maintainable.
3. That the appellant has got locus standi.
4. That the appellant has approached to this Hon'ble Tribunal with clean hands.
5. That the appellant has never concealed material facts from this Hon'ble Tribunal.
6. That the proper and necessary parties have been arrayed as official respondents.
7. That the present appellant is not estopped by law and conduct to file the instant appeal.

8. That the appellant has never concealed the material facts from this Hon'ble Tribunal rather invoked the jurisdiction of this Hon'ble Tribunal on solid grounds with authentic record.

PARAWISE REPLY:-

1. No comments. Further, as mentioned in service appeal that the appellant was appointed as Additional Public Prosecutor/Additional Government Pleader in BPS-17 by the Khyber Pakhtunkhwa Public Service Commission after fulfilling all legal and codal formalities.
2. Contents of para 2 of the appeal are true and correct. Reply given by respondent to Para No.02 of the service appeal is totally incorrect against the facts and law hence, out rightly denied. The official respondents badly failed to annexed even a single authentic and reliable document in support of their contention rather oral allegations have been leveled against the appellant.
 - a) That the appellant never applied to the quarter concerned rather the SP investigation Bajaur at his own provided the vehicle to the appellant through one DFC Iqbal No.6089 vide DD No.86/21 dated 14/10/2021 for official duties for visiting various police station at District Bajaur. The moment when the Judicial Magistrate concerned passed order for return of motor car to its lawful owner, the local police informed the appellant about the Judicial order and in pursuance to the order of the court the appellant handed over the vehicle to the police.
 - b) The appellant had acted in official capacity and has done each and every act in accordance with law and rules, furthermore no deviation from law has been made while tendering opinion on the subject referred by the official respondents. It is pertinent to mention here that the "term" advisory Note " is neither defined in the Civil Servant Act nor in the entire Service Rules, hence the same is ineffective upon the rights of the appellant.
 - c) Incorrect against facts and law hence, denied. The official respondents badly failed to produce even a single document against the appellant.

3

- d) Incorrect against facts and law hence, denied. The officials namely Mujahid and Umar Khan Naib Qasid & Chowkiar never made any complaint against the appellant. After assuming the charge of the post of District Public Prosecutor Bajaur. All subordinate officers/officials were directed by appellant to perform their duties in accordance with law and rules. It is pertinent to mention here that the Regional Director (RD) Prosecution has regularly visited the office of appellant where he was supposed to check all relevant official record as well as the attendance register. During his monthly visits the then RD checked and found the entire official record including the attendance register correct. The RD never made any complaint to the Directorate of Prosecution against the absence of the aforementioned officials, similarly the said officials have also filed no complaint against the appellant for taking illegal consideration rather both the officials mentioned above have deposed in favor of the appellant by submitting affidavits wherein they both have clearly denied the baseless and frivolous allegations leveled against the appellant.
- e) Incorrect, hence denied. The referred Khurshid and Kalam are levies personnel and one of them namely Kalam is working as Gunner with the appellant, whereas, Khursheed Khan is working as Gunner with Raham Dil Haq Deputy Public Prosecutor Bajaur. The official respondents miserably failed to brought on record any documentary proof against the appellant with regard to the allegation leveled.
- f) Incorrect hence denied. The son of appellant is also a law graduate who is enrolled by the KP Bar Council as an Advocate of District Courts prior to the transfer of appellant to District Bajaur as District Public Prosecutor. After successful completion of period of practice the son of appellant was also enrolled as an Advocate of High Court and there is no barring provision that an Advocate is bound to practice in a particular area rather he can practice law anywhere throughout Pakistan at High Court level.

So far the allegations regarding high ratio of acquittals is concerned, the same is mostly attributed to inexperienced, untrained and illiterate levies / police investigators. The primary duty of appellant is an administrative nature and is supposed to have no concerned with appellant. *(Copies of abstracts of Raseed Rahdari dated 14.10.2022 & 02.11.2021 and affidavits of Mujahid Khan and Umar Khan are attached as annexure A, B, C & D).*

4

3. Correct to the extent that the appellant was promoted to BPS-19 on regular basis, keeping in view the meritorious services of the appellant.
4. The appellant never disobeyed the orders of competent authority rather in compliance of the orders of superiors he performed his official duties at different places/hard areas like i.e District Bunner, Shangla and Dir Upper for about 15 years.
5. No comments.
6. Contents of para 06 of the appeal are true and correct. Reply given by the respondents are incorrect hence denied. The appellant has not been treated in accordance with law and rules of the Posting/ Transfer Policy of the Provincial Government. The official respondents neither followed the Provincial Government posting/transfer policy nor Judgment dated 06/08/2019 of the Hon'ble Peshawar High Court Peshawar rendered in Writ Petition No.4119-P/2019.
7. Correct to the extent that the appellant submitted Review Petition through proper channel and the same has not yet been replied, therefore the appellant had no option except to knock the doors of Hon'ble Peshawar High Court by filing Writ Petition No.501-P/2022.
8. No comments. However, the Hon'ble Khyber Pakhtunkhwa Service Tribunal has already granted interim relief in favor of appellant by suspending the transfer order dated 13/05/2022 of the appellant.
9. Contents of para No. 09 of the appeal are true and correct, reply to the para is false and incorrect. The impugned posting/transfer order is illegal, unlawful and against the rules, therefore the appellant went to proper forum for redressal of grievances.

5

Grounds:-

- A. Incorrect, hence denied the appellant has never been treaded in accordance with law, rules and posting/transfer policy of the Provincial Government. Furthermore, the official respondents have also violated the directions contained in the judgment dated 06/08/2019 rendered in Writ Petition No.4119-P/2019.
- B. Incorrect, hence denied. The official respondents were legally bound to provide an opportunity of completing normal tenure of two years, however, the official respondents transferred the appellant in a hasty manner by violating the posting/transfer policy of the Provincial Government of Khyber Pakhtunkhwa with malafide intention to accommodate their blue eyed junior officer of BS-18.
- C. Incorrect, hence denied. As replied vide para B above.
- D. Incorrect, hence denied. As replied vide para B above, moreover, the posting of junior officer on higher post pay scale is totally against the instructions of Establishment Department (Regulation Wing) which have already been circulated for all concerned for the needful.
- E. Incorrect, hence denied. Since the post of Director General Prosecution is technical in nature and according to Rules of 2010 the Senior Most Prosecutors of BS-20 were declared eligible to be promoted to the said post, however, in the year 2016 amendments in the rules ibid has been made in total violation of article 129 of the Constitution of Islamic of Pakistan 1973 as well as the judgment of the apex court report in the PLD 2016 Supreme Court page 808. Moreover in the existing Rules of 2016, the prosecutors has been excluded from the highly technical post of Director General Prosecution which has already been challenged in the Peshawar High Court, Peshawar through Writ Petition No.1837-P/2018 titled "Sikandar Hayat Vs Government of Khyber Pakhtunkhwa & Others" which is still pending before the Hon'ble Peshawar High Court, Peshawar.

6

- F. Incorrect, hence denied. The respondents concealed material facts from this Hon'ble Tribunal. In fact one Mr. Khalid Khan Deputy Public Prosecutor is an officer of grade 18 who is working as District Public Prosecutor BS-19 on acting charge basis. The tentative seniority list of District Public Prosecutors/Senior Public Prosecutors has been circulated on 29/04/2022 wherein the name of the said Mr. Khalid Khan, Deputy Public Prosecutor is nowhere mentioned rather the name of appellant has been mentioned at serial No.05 in the seniority list of grade 19. So by way of transfer order of the appellant the appellant has been made subordinate to his junior which is the worst example of discrimination, victimization, violation of the judgment of Apex Supreme Court of Pakistan rendered in Civil Petition No.5172 dated 10/01/2019. *(Copies of the final seniority list as it stood on 31.07.2021 & Judgment dated 10.01.2019 are attached as annexure E & F)*
- G. Correct to the extent that being senior most officer of grade 19 the appellant was nominated for Senior Management Course (SMC) to which the appellant responded vide letter dated 03/03/2022 & 11/03/2022. However, the appellant has been transferred to District Swabi.
- H. Para H of the appeal are true and correct, reply given to the para is incorrect hence denied. The appellant has been transferred to District Swabi on malafide intention on the pretext of adjustment of the newly promoted officers through impugned notification the senior officers of grade 19 posted in various districts have been humiliated and affected by putting them to work under the supervision of their junior officers of grade 18 which is the clear cut violation of law.
- I. Para I of the appeal are true and correct, reply given to the para is incorrect hence denied. The official respondents never adhere to law, rules and policy of the provincial government and violated the directions contained in a judgment dated 18/10/2012 rendered in Constitution Petition No.23/2012.

(7)

J. Para J of the appeal are true and correct, reply given to the para is incorrect hence denied. The impugned posting order of the appellant to District Swabi is against the law, rules and policy of the Provincial Government. The appellant is aggrieved from the order of posting/transfer therefore invoked the jurisdiction of this Hon'ble Tribunal by filing the instant service appeal.

The grounds taken in the service appeal may kindly be considered as integral part of this re-joinder.

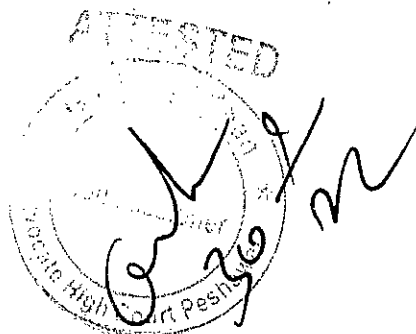
It is, therefore, most humbly prayed that on acceptance of this rejoinder the points taken in the comments/reply may kindly be declared null and void by accepting the service appeal filed by the appellant.

Appellant
Through
Yasir Saleem
&
Yousaf Orakzai
Advocates High Court
Peshawar.

Affidavit

It is solemnly affirmed and declare on oath that the contents of the above rejoinder true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Hon'ble Tribunal.

Deponent



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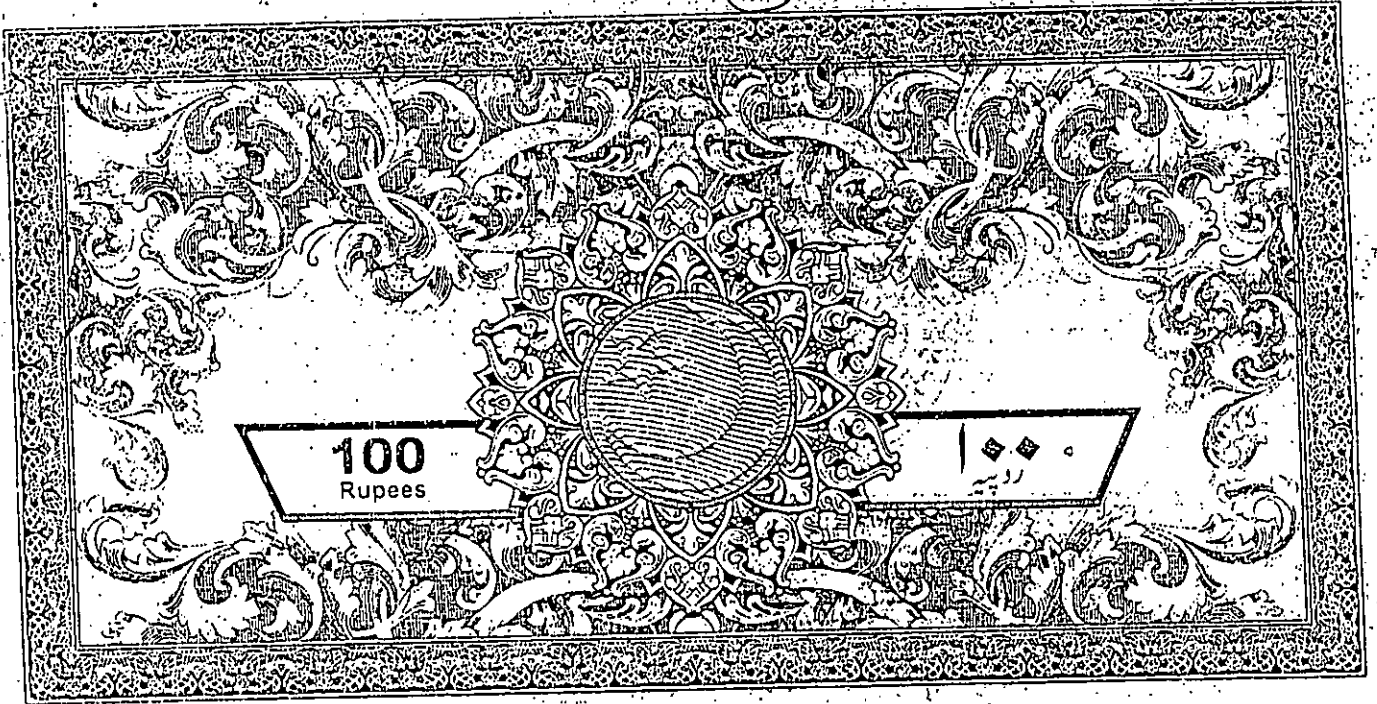


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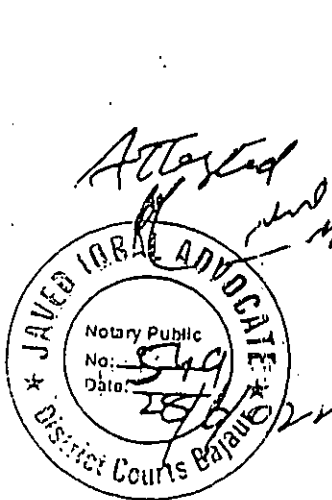
بیان حلفی

منکہ مجاہد خان ولد شہزادہ حضرت یوسف سکند چارمنگ گل آباد تحصیل نادا گئی ضلع باجوڑ حال نائب قاصد DPP آفس باجوڑ بلا جبر واکراہ، بخوشی و رضامندی خود حلفاً اقرار کرتا ہوں کہ میرے علم میں آیا ہے کہ میرے آفسر مجاز سہزادہ DPP باجوڑ پر میری نسبت سے الزام ہے کہ مجاز مذکورہ نے بعوض عدم ادائیگی سرکاری ڈیوٹی مجھ سے مبلغ دس ہزار روپے ماہوار وصول کرتا آرہا ہے جو سراسر غلط من گھڑت، بے بنیاد اور مبنی پر بدینتی ہے۔

من مقرر حالف باقاعدگی کے ساتھ اپنی سرکاری ڈیوٹی سرانجام دیتا آرہا ہوں۔ مزید برآں ریجنل ڈائریکٹر پراسیکیوشن ملاکنڈ باقاعدہ طور پر ہر ماہ ہمارہ حاضری رجسٹر چیک کرتا آرہا ہے جس میں ہماری عدم ادائیگی ڈیوٹی کے بارے میں کوئی شکایت درج نہیں ہے اور نہ ہی ڈائریکٹوریٹ آف پراسیکیوشن کو کوئی تحریری شکایت کی ہے۔

لہذا یہ بیان حلفی لکھ کر اس کے تائید و تصدیق کرتا ہوں۔

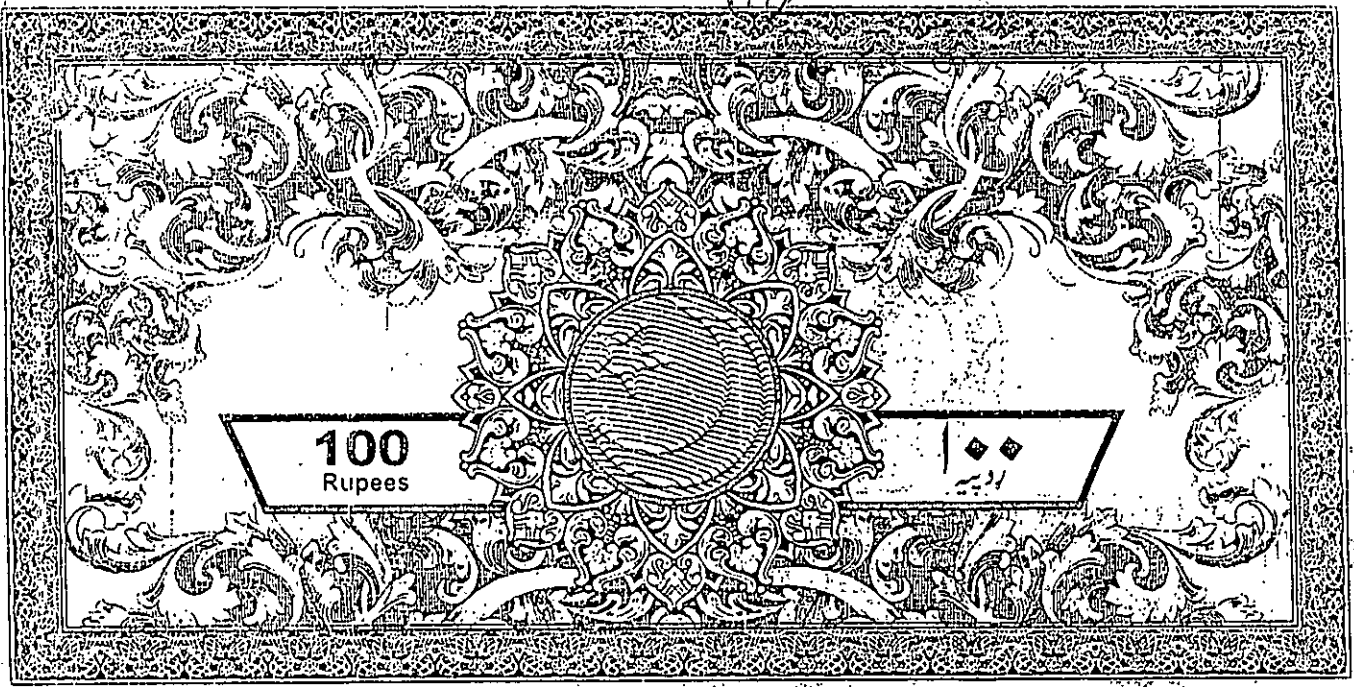
المرقوم: 27-06-2022



الع
مجاہد خان ولد شہزادہ حضرت یوسف
CNIC: 21105-9611812-7

گواہ شدہ: محمد طاہر کورسی صاحب
21105-28120389

گواہ شدہ: الع
21105-8883873-5



بیانِ حلفی

مکنہ عمرخان ولد گل زمین خان سکند لوئی سم تحصیل خالص باجوڑ حال چوکیدار DPP آفس باجوڑ بلاجر واکراہ، بخوشی و رضامندی خود حلفاً اقرار کرتا ہوں کہ میرے علم میں آیا ہے کہ میرے آفسر مجاز سہمی شہزادہ DPP باجوڑ پر میری نسبت سے الزام ہے کہ مجاز مذکورہ نے بعوض عدم ادائیگی سرکاری ڈیوٹی مجھ سے مبلغ دس ہزار روپے ماہوار وصول کرتا آ رہا ہے جو سراسر غلطی گھڑت، بے بنیاد اور مہنی پر بددیہتی ہے۔ من مقرر حالف باقاعدگی کے ساتھ اپنی سرکاری ڈیوٹی سرانجام دیتا آ رہا ہوں۔ مزید برآں ریجنل ڈائریکٹر پراسیکیوشن ملاکنڈ باقاعدہ طور پر ہر ماہ ہمارے حاضری رجسٹر چیک کرتا آ رہا ہے جس میں ہماری عدم ادائیگی ڈیوٹی کے بارے میں کوئی شکایت درج نہیں ہے اور نہ ہی ڈائریکٹوریٹ آف پراسیکیوشن کو کوئی تحریری شکایت کی ہے۔

المرقوم: 27-06-2022

لہذا یہ بیان حلفی لکھ کر اس کے تائید و تصدیق کرتا ہوں۔

عمرخان ولد گل زمین

عمرخان ولد گل زمین

CNIC: 21103-9673210-7



عبد الرؤف سکند سندھ

گواہ شدہ: 21103-6226581-1

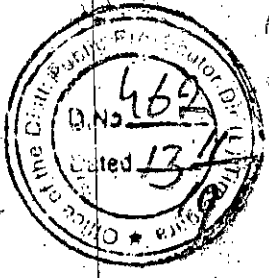
فقیر حسین ولد گل زمین سکندھ

گواہ شدہ: 21105-6107137-9

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dt: 13/11/19



**DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA**

No. DP/EA/1(49)11117 - 57

Dated Peshawar 04/11/2019

Office Phone # 091-9212559

Fax # 091-9212559

E-mail kpprosecution@yahoo.com

To: All District Public Prosecutors,
In Khyber Pakhtunkhwa.

Basouri

Attention: All Deputy Public Prosecutor (BS-18).

Subject: - FINAL SENIORITY LIST OF DEPUTY PUBLIC PROSECUTORS
(BPS-18).

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of "Final Seniority List" of the Deputy Public Prosecutors (BS-18) working at the strength of Directorate of Prosecution. The same may be handed over to all the Officers concerned working under your kind control for information and further necessary action, please.

Yours faithfully,

Assistant Director Admin/Training

Encl: (as above)

Copy forwarded for information to the:

- 01. All Regional Director Prosecution Khyber Pakhtunkhwa.
- 02. PA to Director General Prosecution, Khyber Pakhtunkhwa.

Assistant Director Admin/Training



13

GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

Dated Peshawar, the 29/10/2019

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NOTIFICATION

No.SO(PROSECUTION)/1-27/2018/Dy:PP: In pursuance Section-8(1) of Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the competent authority is pleased to notify/circulate Final Seniority List of Deputy Public Prosecutor (BS-18) of Directorate of Prosecution, Khyber Pakhtunkhwa as stood on 30-09-2019.

Sl. No.	Name of Officer	Date of Birth	Present Post	Regular	Appointment	Promotion	Remarks
1.	Shaffullah, B.A, LL.B	31/12/1982 FR, Bannu.	21/09/2010 as Deputy Public Prosecutor, (BPS-17)	21/09/2010	(BS-18)	Through Public Service Commission	Directorate of Prosecution
2.	Usman Zaman Mohmand B.A, LL.B	04/11/1980 Mohmand Agency	26/05/2008 as Assistant Public Prosecutor (BPS-16) and 21/09/2010 as Deputy Public Prosecutor	21/09/2010	(BS-18)	-do-	On Deputation Establishment Department
3.	Qasim Farooq, M.A, LL.B	27/12/1979 Abbottabad	05/05/2008 as Assistant Public Prosecutor (BPS-16) and 21/09/2010 as Deputy Public Prosecutor	21/09/2010	(BS-18)	-do-	Haripur
4.	Hussain Ahmad, B.A, LLM	10/04/1980 Shangla	17/06/2009 as Assistant Public Prosecutor (BPS-16) and 21/09/2010 as Deputy Public Prosecutor	21/09/2010	(BS-18)	-do-	Shangla
5.	Sifatullah, B.A, LL.B	10/04/1978 Peshawar	21/09/2010 as Deputy Public Prosecutor, (BPS-17)	21/09/2010	(BS-18)	-do-	Peshawar
6.	Taimur Khattak, B.A, LL.B	25/12/1980 Nowshera	21-09-2010 as Deputy Public Prosecutor, (BPS-17)	21/09/2010	(BS-18)	-do-	Buner
7.	Taj Muhammad, B.A, LL.B	05/03/1978 Lakki Marwat	21/09/2010 as Deputy Public Prosecutor, (BPS-17)	21/09/2010	(BS-18)	-do-	Karak
8.	Bakhtiar Khan, B.A, LL.B	12/01/1978 Mohmand Agency.	21/09/2010 as Deputy Public Prosecutor, (BPS-17)	21/09/2010	(BS-18)	-do-	Mardan
9.	Wajid Ali, M.A, LL.B	02/04/1980 Charsadda.	05/05/2008 as Assistant Public Prosecutor (BPS-16)	24/09/2010	(BS-18)	-do-	Nowshera
10.	Miss Shaheen Tabasum, B.A, LL.B	12/4/1982 Kohat	11/03/2009 as Assistant Public Prosecutor (BPS-16) and 27/08/2009 as Deputy Public Prosecutor	27/08/2009	(BS-18)	-do-	Kohat

Sl. No.	NAME OF OFFICER (WITH QUALIFICATION)	DATE OF BIRTH (DD/MM)	DATE OF FIRST ENTRY BPS (DD/MM)	REGULAR APPOINTMENT PROMOTION TO (DD/MM)	PRESENT POSTING
11.	Azhar Ali, B.A, LLB	18/04.1983 Peshawar	24/09/2010 as Deputy Public Prosecutor (BPS-17)	24/09/2010	(BS-18) -do- Kohat
12.	Jamshid Khan Mahsud, B.A, LLB	01/06/1977 S.W.Agency.	24/09/2010 as Deputy Public Prosecutor (BPS-17)	24/09/2010	(BS-18) -do- D.I.Khan
13.	Qaisar Khan, B.A, LLB	01/01/1980 Peshawar.	05/05/2008 as Assistant Public Prosecutor (BPS-16) and 24/09/2010 as Deputy Public Prosecutor	24/09/2010	(BS-18) -do- Peshawar
14.	Ayaz Zarin, B.A, LLB	20/04/1983 Chitral.	24/09/2010 as Deputy Public Prosecutor (BPS-17)	24/09/2010	(BS-18) -do- Chitral
15.	Zafar Ali, B.A, LLB	30/03/1982 Mohmand Agency.	26/05/2008 as Assistant Public Prosecutor (BPS-16) and 24/09/2010 as Deputy Public Prosecutor	24/09/2010	(BS-18) -do- Charsadda
16.	Sangeen Shah, B.A, LLB.	12/04/1982 Charsadda.	05/05/2008 as Assistant Public Prosecutor (BPS-16) and 24/09/2010 as Deputy Public Prosecutor	24/09/2010	(BS-18) -do- Peshawar
17.	Asmat ullah, M.A, LLB	15/03/1980 S.W.Agency.	24/09/2010 as Deputy Public Prosecutor, (BPS-17)	24/09/2010	(BS-18) -do- DI Khan
18.	Mian Aziz Ahmad, M.A, LLB	05/06/1979 Dir (Upper).	24/09/2010 as Deputy Public Prosecutor, (BPS-17)	24/09/2010	(BS-18) -do- Deputy Director Legal Directorate of Prosecution
19.	Muhammad Bilal Qureshi B.A, LLB	04/07/1983 Abbottabad.	24/09/2010 as Deputy Public Prosecutor, (BPS-17)	24/09/2010	(BS-18) -do- Haripur
20.	Akhtar Nawaz Khan, B.A, LLB	19/12/1978 Haripur.	24/09/2010 as Deputy Public Prosecutor, (BPS-17)	24/09/2010	(BS-18) -do- Swabi
21.	Muhammad Saleem, B.A, LLB	14/09/1959, Malakand Agency	01/10/1987 as PSI (BPS-11) in Police Department.	27-02-2012	(BS-18) Promoted Dir (Upper)
22.	Imran Shah, M.A, LLB	20/04/1959, Dir	01/10/1987 as PSI (BPS-11) in Police Department.	27-02-2012	(BS-18) -do- Malakand
23.	Javeed Hussain Mughal B.A, LLB	10/10/1961, Chitral	01/10/1987 as PSI (BPS-11) in Police Department.	27-02-2012	(BS-18) -do- Chitral
24.	Mr. Zia-ul-Haq BA,LLB	01/08/1978, Dir (Lower)	03/01/2011 as Assistant Public Prosecutor (BPS-16) and 03/06/2014 as Deputy Public Prosecutor	03/06/2014	(BS-18) Through Public Service Commission Dir Lower
25.	Mr. Attiq-ur-Rehman MA,LLB	01/04/1980 Peshawar	05/05/2008 as Assistant Public Prosecutor (BPS-16) and 03/06/2014 as Deputy Public Prosecutor	03/06/2014	(BS-18) -do- Nowshera
26.	Mr. Zeeshan Ullah Afridi BA,LLB	10/06/1982 FR Kohat	03/01/2011 as Assistant Public Prosecutor (BPS-16 and 03/06/2014 as Deputy Public Prosecutor)	03/06/2014	(BS-18) -do- Swabi

Retired

(14)

Sl. No.	NAME OF OFFICER WITH QUALIFICATION	DATE OF BIRTH	DATE OF FIRST ENTRY BPS	REGULAR APPOINTMENT / PROMOTION TO			PRESENT POSTING
				Grade	Scale	Through	
27.	Miss. Sobia Rasheed Raja MA, LLB	16-05-1982 Abbottabad	24/05/2016 As Deputy Public Prosecutor (BS-17)	24/05/2016	(BS-18)	Through Public Service Commission	Abbottabad
28.	Mr. Farsatullah	31-10-1984 Tank	24/05/2016 As Deputy Public Prosecutor (BS-17)	24/05/2016	(BS-18)	-do-	DI Khan
29.	Miss. Bibi Sumera MA, LLB	05-05-1979 Manshera	24/05/2016 As Deputy Public Prosecutor (BS-17)	24/05/2016	(BS-18)	-do-	Manshera
30.	Miss. Mahjabeen MA, LLB	20-02-1980 Battagram	24/05/2016 As Deputy Public Prosecutor (BS-17)	24/05/2016	(BS-18)	-do-	Manshera
31.	Abdul Qudus-Khan	03-10-1987 Bannu	24/05/2016 As Deputy Public Prosecutor (BS-17)	24/05/2016	(BS-18)	-do-	DI Khan
32.	Miss. Fari Rafique	21-10-1979 Abbottabad	30/09/2016 As Deputy Public Prosecutor (BS-17)	30/09/2016	(BS-18)	-do-	Abbottabad
33.	Mr. Altaf Hussain, B.A, LLB	12/02/1961, D.I.Khan	17/09/1989 as PSI (BPS-11) in Police Department.	20/05/2018	-do-	Promoted	Bannu
34.	Mr. Fazale Hadi, B.A, LLB	03/10/1960, Dir (Upper)	09/12/1990 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Nowshera
35.	Mr. Itaf Hussain Akhtar, B.A, LLB	01/04/1962, Manshera	31/07/1991 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Manshera
36.	Mr. Muhammad Afzal Khan, MA, LLB	01/05/1965, Chitral	18/06/1992 as PSI (BPS-14) b in Police Department.	-do-	-do-	-do-	Chitral
37.	Mr. Javid Iqbal Anwar, B.A, LLB	20/09/1965, Haripur.	29/03/1993 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Haripur
38.	Mr. Muhammad Shakeel Ahmad B.A, B.Ed. LLB	02/05/1968, D.I.Khan.	02/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	DI Khan
39.	Mr. Attaullah, B.Sc, LLB	20/08/1971, Lakki Marwat	06/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Bannu
40.	Mr. Muhammad Nadeem, B.A, LLB	09/04/1969, Lakki Marwat	06/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Lakki Marwat
41.	Mr. Hayatullah, B.A, LLB	02/01/1970, Bannu	08/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Lakki Marwat
42.	Mr. Sher Bahadar Khan, B.Sc LLB	06/09/1973, D.I.Khan	02/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Tank
43.	Mr. Ziaullah Wazir, B.A, LLB	26/10/1965, F.R Bannu	08/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Manshera
44.	Mr. Khalid Khan, B.A, LLB	10/02/1969, Swabi.	15/10/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	Mardan
45.	Mr. Tasawar Hussain, B.A, LLB	01/04/1970, D.I.Khan	02/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	-do-	D.I.Khan

S. No.	NAME OF OFFICER WITH QUALIFICATION	DATE OF BIRTH	DATE OF FIRST ENTRY IN SERVICE	REGULAR APPOINTMENT / PROMOTION TO PRESENT POST	PRESENT POST	
46.	Mr. Amanullah, M.A, LL.B	19/12/1966, Lakki Marwat.	08/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	Kohat
47.	Mr. Muzafar Ahmad, B.A, LL.B	12/02/1968, Dir (Lower)	05/04/1999 as PSI (BPS-14) in Police Department.	-do-	-do-	Swat
48.	Mr. Javed Ur Rehman, B.A, LL.B	02/09/1965, Mardan.	05/04/1999 as PSI (BPS-14) in Police Department	-do-	-do-	Dir Lower
49.	Mr. Syed Falak Sair, B.Sc, LL.B	05/12/1964, Dir (Upper)	06/04/1999 as PSI (BPS-14) in Police Department	-do-	-do-	Charsadda
50.	Mr. Manzoor Alam Khan, B.A, LL.B	27/04/1982, Peshawar.	05/05/2008 as Assistant Public Prosecutor (BPS-16)	-do-	-do-	Peshawar
51.	Mr. Umer Niaz, B.A, LL.B	12/03/1981, Karak	05/05/2008 as Assistant Public Prosecutor (BPS-16)	-do-	-do-	Kohat
52.	Mr. Rafi Ullah, M.A, LL.B	01/04/1983, Mohmand Agency	26/5/2008 as Assistant Public Prosecutor (BPS-16)	-do-	-do-	Mardan
53.	Mr. Muhammad Tufail, B.A, LL.B	30/03/1981, Mohammad Agency	26/05/2008 as Assistant Public Prosecutor (BPS-16)	-do-	-do-	Malakand
54.	Mr. Ibad-ur-Rehman, B.Sc, LL.B	17/11/1978, Peshawar.	05/05/2008 as Assistant Public Prosecutor (BPS-16)	-do-	-do-	Hangu
55.	Mr. Asim Mehmood, B.A, LL.B	01/04/1980, Abbottabad	05/05/2008 as Assistant Public Prosecutor (BPS-16)	-do-	-do-	Abbottabad

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT.

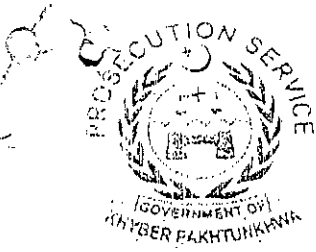
Endst: of Even No. & Date:

Copy forwarded to:-

1. The Chief Secretary, Khyber Pakhtunkhwa.
2. The Secretary to Govt: of Khyber Pakhtunkhwa, Establishment Department.
3. The Director General Prosecution, Khyber Pakhtunkhwa.
4. All the District Public Prosecutors in Khyber Pakhtunkhwa.
5. P.S to Secretary Home Department, Khyber Pakhtunkhwa.


Section Officer (Prosecution)

(15)



**DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA**

No. SP/E.A/1(49)17067-17112

Dated Peshawar 15/12/2021

Office Phone # 91-9212559

Fax # 091-9212559

E-mail kp prosecution@yahoo.com

To All District Public Prosecutors,
in Khyber Pakhtunkhwa.

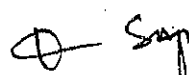
Attention: All Senior Public Prosecutors (BPS-19).

Subject: - FINAL SENIORITY LIST OF DISTRICT PUBLIC PROSECUTORS/SENIOR PUBLIC PROSECUTORS (BPS-19).

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of "Final Seniority List" of the District Public Prosecutors/Senior Public Prosecutor (BS-19), Directorate of Prosecution. The same may be handed over to all the Officers concerned working under your kind control for information and further necessary action, please.

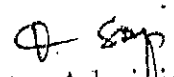
Yours faithfully,


Deputy Director Administration

(Encl: as above)

Copy forwarded for information to the:

01. Director Monitoring Cell and Director Legal Prosecution Directorate of Prosecution Khyber Pakhtunkhwa.
02. All Regional Director Prosecution Khyber Pakhtunkhwa.
03. PA to Director General Prosecution, Khyber Pakhtunkhwa.


Deputy Director Administration



16

76

GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

Dated Peshawar, the 13th December, 2021.

12415
13/12/2021

NOTIFICATION

No.SO(PROSECUTION)/1-27/2020/Vol-I: In pursuance of Section-8(1) of Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the competent authority is pleased to notify/circulate Final Seniority List of District/Senior Public Prosecutor (BS-19) of the Directorate of Prosecution as stood on 31-07-2021.

13-12-2021

DA

13/12

ADA R

Signature

13/12

Supdt

Signature

S. #	Name of officer with academic qualification	Date of Birth & Domicile	Date of first entry into service with BPS	Regular appointment/Promotion to present post			Present posting
				Date	BPS	Method of recruitment	
1.	Muhammad Sultan Mahmood, B.A, LL.B	06/01/1966 D.I.Khan	17/10/1995 as Add: PP (BPS-17)	12-02-2011	BS-19	By promotion on regular basis.	District Public Prosecutor Peshawar
2.	Mr. Amjid Ali Shah, B.A, LL.B	16/06/1963 Swabi	04/10/1995 as Add: PP (BPS-17)	-do-	-do-	-do-	RD Malakand (OPS)
3.	Muhammad Ibrahim, B.A, LL.B	15/02/1963 Malakand.	04/10/ 1995 as Add: PP (BPS-17)	-do-	-do-	-do-	RD Mardan (OPS)
4.	Mr. Tariq Bakhsh, B.A, LL.B	14/02/1966 Kohat.	25/11/1998 as Add: PP(BPS-17)	-do-	-do-	-do-	RD Kohat (OPS)
5.	Mr. Shahzada, M.A, LL.B	04/10/1964 Bajour Agency	28/11/1998 as Add: PP(BPS-17)	-do-	-do-	-do-	District Public Prosecutor Bajaur

17

HYPEN

S. No.	Name of officer with academic qualification	Date of Birth & Domicile	Date of first entry into service with BPS	Appointment / Promotion to present			Present P.
				Date	BPS	Method of recruitment	
				-do-	-do-	-do-	RD Hazara (OPS)
6.	Mr. Hafiz Muhammad Haroon B.A,LL.B	01/04/1965 Manshra	28/11/1998 as Add: PP(BPS-17)	-do-	-do-	-do-	District Public Prosecutor Charsadda
7.	Mr. NusratUllah Jan, B.A, L.L.B	10/10/1965 Peshawar	25/11/1998 as Add: PP(BPS-17)	-do-	-do-	-do-	Director Monitoring Prosecution
8.	Mr. Saleem Muhammad, B.A, L.L.B	04/04/1964 Malakand Agency	18/09/1991 as PSI BPS-14 in Police department	-do-	-do-	-do-	RD DI Khan (OPS)
9.	Mr. Abdul Wajid, B.A, L.L.B	10/10/1966 D.I.Khan	27/11/1998 as Add: PP(BPS-17)	-do-	-do-	-do-	District Public Prosecutor Bannu
10.	Mr. Imtiaz-Ud- Din Mansoor, B.A, L.L.B	12/10/1963 D.I.Khan	09/01/2001 as Add: PP (BPS-17)	30/04/2013	-do-	-do-	RD Bannu (OPS)
11.	Mr. Gul Waris Khan, B.A, L.L.B	10/07/1968 FR Bannu	09/01/2001 as Add: PP (BPS-17)	11-04-2017	-do-	-do-	Senior Public Prosecutor Peshawar
12.	Mr. Zulfiqar Ali Khan, B.A, L.L.B	03/03/1968 Swabi	19/04/2002 as Add: PP (BPS-17)	-do-	-do-	-do-	Director Legal Prosecution
13.	Mr. Saeed Naeem, M.A, L.L.B	10/03/1966 Dir Lower	19/04/2002 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor ATC
14	Mr. Kamran Khan Wazir	04/02/1968 FR Bannu	19/04/2002 as Add: PP (BPS-17)	-do-	-do-	-do-	

15

18

Sl. No.	Name of officer with Qualification	Date of Birth	Date of first entry into service	Regular appointment / Present post			Senior position
				Date	Post	Method of recruitment	
	M.A, L.L.B						
15.	Muhammad Jehanzeb Sheikh, B.Sc, L.L.B	20/09/1967 D.I.Khan	19/04/2002 as Add: PP (BPS-17)	-do-	-do-	-do-	Mardan Senior Public Prosecutor South Waziristan
16.	Mr. Jehanzeb Khan, B.A, L.L.B	25/12/1967 Peshawar	19/04/2002 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor Peshawar
17.	Mr. Shehzad Iqbal, B.A, L.L.B	08/06/1967 Peshawar	04/04/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Abbottabad
18.	Mr. Fazal Noorani, B.A, L.L.B	01/03/1970 Peshawar	04/04/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor ATC Peshawar
19.	Mr. Arif Bilal, M.A, L.L.B	23/03/1968 Peshawar	04/04/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor Peshawar
20.	Mr. Zahid Amin, B.A, L.L.B	20/04/1972 Mardan	04/04/2003 as Add: PP(BPS-17)	02-02-2017	-do-	-do-	Senior Public Prosecutor ATC Swat
21.	Mr. Attaullah Shah, B.A, L.L.B	25/11/1968 Lakki Marwat	04/04/2003 as Add: PP (BPS-17)	11-04-2017	-do-	By Promotion	District Public Prosecutor, DI Khan
22.	Mr. Faheem Khan, B.Sc, L.L.B	03/03/1969 Kohat	04/04/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Kohat
23.	Mr. Jamshed Khan , M.A, L.L.B	15/08/1965 Charsadda	04/04/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor Peshawar

19

S. No.	Name of officer with academic qualification	Date of Birth Domicile	Date of first entry into service with D.P.S.	Regular appointment / Information to present			Present in
				Date	BPS	Method of appointment	
24.	Mr. Mian Shaïd ur Rehman, B.Sc., L.L.B	06/10/1971 Nowshera	16/09/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Battagram
25.	Mr. Muhammad Zulfiqar Ali B.A, L.L.B	20/04/1968 Peshawar	16/09/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor Peshawar
26.	Mr. Muhammad Ayub, B.A, L.L.B	12/11/1968 D.I.Khan	16/09/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Tank
27.	Mr. Saqib Sultan Jadoon, B.A, L.L.B	27/02/1971 Abbottabad	16/09/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Mansehra
28.	Mr. Irshadullah Afridi, B.Sc., L.L.B	01/01/1966 F.R Kohat	16/09/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor Peshawar
29.	Mr. Muhammad Irshad, B.A, L.L.B	05/12/1970 Bajour Agency	16/09/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Bunner
30.	Mr. Muhammad Litaf, B.A, L.L.B	13/02/1971 Mohmand Agency	16/09/2003 as Add: PP (BPS-17)	02-02-2017	-do-	-do-	Senior Public Prosecutor Charsada
31.	Mr. Muhammad Khalid, B.A, L.L.B	20/08/1969 Khyber Agency	16/09/2003 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor Peshawar
32.	Mr. Alam Zeb Khan, B.A, L.L.B	12/12/1964 Dir Upper	26/09/1991 as PSI in (BPS-14) and on 14-02-2004 as Add: PP(BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor A.T.

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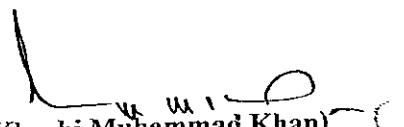
Sl. No.	Academic qualification	Date of Birth	Date of first entry into service	Regular appointment/Promotion to present post			Present posting
				Date	BPS	Method of recruitment	
							Peshawar
33.	Mr. Nawab Zareen BA, L.L.B	13/11/1968 FR Bannu	14/02/2004 As Add: PP (BS-17)	-do-	-do-	-do-	Senior Public Prosecutor ATC Bannu
34.	Mr. Raza Khan, B.A., L.L.B	09/01/1970 Mohmand Agency	14/02/2004 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Mardan
35.	Mr. Muhamnad Younas Khan, M.A., L.L.B	10/01/1966 Abbottabad	30/07/1991 as PSI in (BPS-14) and on 14-02-2004 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Haripur
36.	Mr. Zafar Abbas Mirza , B.A., L.L.B	22/11/1973 Peshawar	14-02-2004 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor Peshawar
37.	Mr. Nisar Aiam , B.A., L.L.B	17/03/1964 Shangla	14-02-2004 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Shangla
38.	Mr. Attaur Rehman , B.A., L.L.B	11/01/1970 Peshawar	14-02-2004 as Add: PP (BPS-17)	-do-	-do-	-do-	District Public Prosecutor Lower Kohistan
39.	Mr. Anwar Ali , B.Sc, L.L.B	16/04/1968 Swat	17-06-2004 as Add: PP (BPS-17)	-do-	-do-	-do-	Senior Public Prosecutor ATC Swat

(21)

Endst: of Even No. & Date:

Copy forwarded to:-

1. The Secretary to Establishment and Administration Department, Peshawar.
2. The Director General Prosecution, Khyber Pakhtunkhwa, Peshawar.
3. PSO to Chief Secretary, Khyber Pakhtunkhwa.
4. All Regional Directors(Prosecutors) in Khyber Pakhtunkhwa.
5. All District Public Prosecutors in Khyber Pakhtunkhwa.
6. Officers Concerned through Directorate Prosecution, Khyber Pakhtunkhwa.
7. P.S to Secretary Home & Tribal Affairs Department & Tribal Affairs Department, Peshawar.
8. PS to Special Secretary-I, Home & Tribal Affairs Department & Tribal Affairs Department, Peshawar.
9. Master File


(Khushi Muhammad Khan)
Section Officer (Prosecution)

IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

PRESENT:

MR. JUSTICE UMAR ATA BANDIAL
MR. JUSTICE MUNIB AKHTAR
MR. JUSTICE YAHYA AFRIDI

CIVIL PETITION NO. 5172 OF 2017
(on appeal against the judgment dated
12.10.2017 of the Peshawar High Court,
Peshawar passed in W.P. No.4816-P/2016)

Amjad Ali Shah and others

...Petitioner(s)

VERSUS

Chief Secretary, Govt. of KPK thr. Chief
Secretary, Peshawar and others

...Respondent(s)

For the Petitioner(s): Mr. Gohar Ali Khan, ASC

For the Respondent(s): *Barrister Qasim Wadood, Adil AG, KPK*

Date of Hearing: 10.01.2019

ORDER

UMAR ATA BANDIAL, J.— Learned counsel for the petitioners submits that the petitioners being District Public Prosecutors, Directors, Legal and Senior Public Prosecutors have filed writ petition praying for the upgradation of their posts. They claimed that the posts of officers junior to them namely, Assistant Public Prosecutors (BPS-16), Deputy Public Prosecutors (BPS-17) and Public Prosecutors (BPS-18) have respectively been upgraded to BPS-17, to BPS-18 and to BPS-19 by the Provincial Government as directed by the learned High Court *vide* its judgments dated 21.11.2013 and 07.06.2016. The petitioners' writ petition claiming relief already granted to their colleagues was disposed of *inter alia*, on the ground that upgradation of their posts is not covered under the government policy. In any event, advancement in their careers

23

CP 5172/17

-: 3 :-

remains, however, that the present arrangement may create administrative discontent and disorder. To prevent that situation the Government may, if so inclined, take appropriate steps. The Court cannot in this regard issue any direction. Nevertheless, the concerned department should inform the Government about the existence of the administrative anomaly highlighted by the learned counsel for the petitioners and that the same deserves redressal by suitable means. Dismissed accordingly.

Sd/-J

Sd/-J

Sd/-J

ISLAMABAD
10th January, 2019.

Mudassar/*

Mudassar

34/1/19

"Not approved for reporting"

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.**

Service Appeal No.664/2022

Shah Zada District Public Prosecutor, Bajaur.

.....Applicant/Appellant

Versus

1. The Government of Khyber Pakhtunkhwa through Chief Secretary.
2. The Secretary to Government of Khyber Pakhtunkhwa Home & Tribal Affairs Department, Peshawar.
3. The Director General Prosecution, Khyber Pakhtunkhwa, Peshawar.

.....Respondents

**APPLICATION FOR DISOBEDIENCE OF INTERIM ORDER OF THIS
HON'BLE SERVICE TRIBUNAL WITH FURTHER DIRECTION TO
RESPONDENTS TO IMPLEMENT THE ORDER DATED 13/05/2022 IN
LETTER AND SPIRIT.**

Respectfully Sheweth:-

1. That the above captioned service appeal is pending before this Hon'ble Tribunal and next date for hearing is fixed for 06/07/2022.
2. That this Hon'ble Service Tribunal was kind enough to grant interim relief by suspending the impugned posting/transfer Notification No.SO(PROOS)/HD/ Posting Transf-2022 dated 31/01/2022 vide order dated 13/05/2022. (Copy enclosed)
3. That despite restraining/suspension order the appellant has been directed to report to Directorate of Prosecution Khyber Pakhtunkhwa vide order No.SO (Prosecution)HD/1-13/2022 dated 02/06/2022. Despite of clear cut interim order which fact amounts to defeating/flouting the order of this Hon'ble Tribunal.(copy enclosed)
4. That the power of DPP has also been withdrawn from the appellant and District Public Prosecutor, Mohmand has been notified as DDO for District Public Prosecutor Office, Bajaur. (Copy enclosed)

5. That both the orders are clearly in conflict with restraining orders issued by this Hon'ble Tribunal dated 13/05/2022.
6. That the provisions of Civil Procedure Code are applicable ipso factoto the Service Tribunal.
7. That any ground not specifically taken/prayed for in this application may also be allowed at the time of arguments with the permission of this Hon'ble Tribunal.

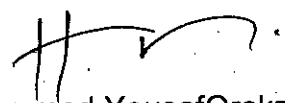
In light of the above, it is most humbly prayed that on acceptance of this application that actions may kindly be taken against Respondents on account of willful disobedience of the order of this Hon'ble Tribunal with further direction to respondents to implement the order dated: 13/05/2022 of this Hon'ble Tribunal.

Applicant/Appellant

Through


Yasir Saleem

&


Muhammad Yousaf Orakzai
Advocates of High Court.

AFFIDAVIT:-

It is hereby solemnly affirm and declare on oath that the contents of this application are true and correct and nothing has been concealed from this Hon'ble Tribunal.


Deponent

ATTESTED



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 458
Dated 24/3/2022

Service Appeal No. 664 /2022

Shah Zada District Public Prosecutor (BPS 19) District Bajaur Under transfer
to Swabhi, as Senior Public Prosecutor

..... Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat Peshawar
2. Secretary to the Government of Khyber Pakhtunkhwa Home and Tribal Affairs, Department, Civil Secretariat Peshawar
3. Director, General Prosecution, Khyber Pakhtunkhwa Peshawar

..... Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST THE NOTIFICATION DATED 31.01.2022 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM THE POST OF DISTRICT PUBLIC PROSECUTOR BPS-19 BAJAUR TO SWABI AS SENIOR PUBLIC PROSECUTOR BPS-19 AGAINST WHICH HIS DEPARTMENTAL APPEAL / REVIEW DATED 03.02.2022 HAS NOT BEEN RESPONDED TILL DATE.

Prayer in Appeal:

On acceptance of this service appeal the impugned order dated 31.01.2022 may be set aside to the extent of appellant and he may be allowed to continue his duties as District Public Prosecutor at Bajaur.

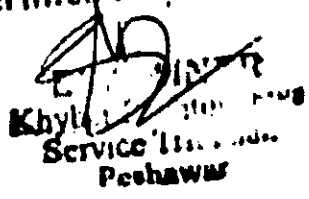
Or,
Any other remedy deemed proper may also be allowed.

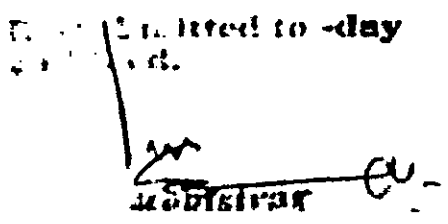
Filed to-day
Registrar
24/3/2022

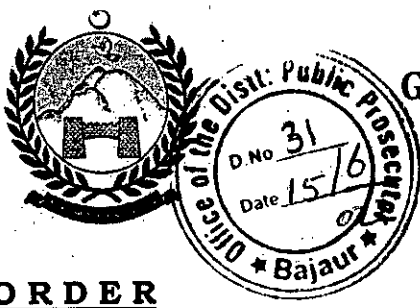
Respectfully Submitted.

1. That the Appellant was initially appointed as Additional Public Prosecutor BPS-17 through Public Service Commission and was posted at Nowshera.

Certified to be true copy


Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Filed to-day

Registrar



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

Dated Peshawar the June 02, 2022.

ORDER

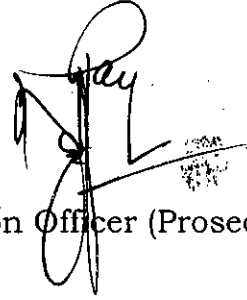
No. SO(Prosecution)/HD/1-31/Shahzada SPP Bajawar/2022: In exercise of powers conferred under Rule-6 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 the competent authority (Chief Secretary Khyber Pakhtunkhwa) is pleased to place the services of Mr. Shahzada, Senior Public Prosecutor (BS-19), Bajawar, under suspension for a period of 90 days with immediate effect.

**SECRETARY
HOME & TRIBAL AFFAIRS
DEPARTMENT**

Endst No. and date even: -

Copy forwarded to: -

1. The Director General Prosecution, Khyber Pakhtunkhwa.
2. Mr. Shahzada, Senior Public Prosecutor, Bajawar is directed to report to the Directorate of Prosecution, Khyber Pakhtunkhwa.
3. PS to Secretary Home Department, Khyber Pakhtunkhwa.
4. PS to Special Secretary-I, Home Department, Khyber Pakhtunkhwa.
5. Master File.


Section Officer (Prosecution)

DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No

Dated Peshawar 27 / 12 / 2019

Office Phone # 011-0212950

Fax # 011-0212950

E-mail prosecution@khyber.gov.pk

ORDER:

- 18

No. DP/E&A/11(23)16209: Mr. Manzoor Alam, District Public Prosecutor, Mohmand is hereby declared as Drawing and Disbursing Officer (D.D.O) for the office of the District Public Prosecutor, Bajaur till further order under the Provision contained in Rule-3 of the General Financial Rules (GFR) Vol-I under functional classification 03-Public order and safety Affairs 036-Admin, Public order 0361- Admin 36101 Secretariat.

-Sd-

Director General Prosecution
Khyber Pakhtunkhwa.

Endst : of even No. dated:

Copy forwarded for information to the:

1. Regional Director Prosecution, Malakand Division, Mardan.
2. Mr. Manzoor Alam, District Public Prosecutor Mohmand with the directions to continue the work of District Public Prosecutor Office, Bajaur till further order.
3. District Account Office, Bajaur.
4. National Bank of Bajaur.
5. PA to Director General Prosecution, Khyber Pakhtunkhwa.

Deputy Director Administration