


FORM OF ORDER SHEET

Court of _____

Appeal No. 1152/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/05/2023	<p>The appeal of Mr. Junaid Nazir resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____</p> <p>By the order of Chairman  For REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

In Service Appeal No. ¹¹⁵² /2023

Junaid Nazir

V/S

Forest Department

**APPLICATION FOR FIXING THE INSTANT SERVICE APPEAL
AT PRINCIPAL SEAT AT PESHAWAR.**

RESPECTFULLY SHEWETH:

1. That the petitioner has filed the instant service appeal for correction of his seniority position according to inter-se-seniority assigned by the Commission in the seniority list dated 09.09.2021 and 24.01.2023 in this Honorable Tribunal.
2. That the appellant engaged the counsel which is doing legal practice at Peshawar and the appellant also wants to pursue his case at Principal seat at Peshawar.
3. That it will be convenient for both appellant as well as for his counsel if the instant appeal fix in principal seat at Peshawar.

It is therefore most humbly prayed that on acceptance of this application the instant appeal may kindly be fixed at principal seat at Peshawar.

APPLICANT/ PETITIONER

THROUGH:



**(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT**

The appeal of Mr. Junaid Nazir Forest Ranger SDFO Jared Kaghan Forest Division Mansehra received today i.e. on 27.04.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Affidavit be got attested by the Oath Commissioner.
- 5- Addresses of respondents no. 6 to 10 are incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 6- All the annexures of the appeal are illegible which may be replaced by legible/better one.
- 7- 12 copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1328 /S.T.

Dt: 5/5 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Taimur Ali Khan Adv.
High Court Peshawar.

Respected Sir -

1- Removed

2- Removed

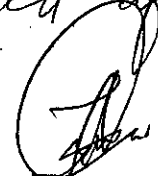
3- Removed

4- Removed

5- Addresses of respondents No. 6 to 10 all completed

6- Removed

7- Removed

Resubmitted after compliance


19/5/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 1152/2023

Junaid Nazir

VS

Forest Department

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S.No.	Documents	Annexure	P. No.
1.	Memo of Appeal	-----	01-06
2.	Affidavit	-----	07
3.	Copy of recommendation letter dated 21.07.2021	A	08
4.	Copy of appointment order dated 13.01.2020	B	09-09- A
5.	Copy of seniority list dated 09.09.2021 and 24.01.2023	C&D	10-15
6.	Copies of departmental appeal and rejection order/letter dated 29.03.2023	E&F	16-17
7.	Vakalat Nama	-----	18

APPELLANT

THROUGH:



(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT.

0333-9390916

D

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 1152/2023

Mr. Junaid Nazir, Forest Ranger (BPS-16) SDFO (ACB),
Jared, Kaghan Forest Division Jabba, Mansehra.

APPELLANT

VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. The Secretary to the Government of Khyber Pakhtunkhwa Forestry, Environment & wildlife Development Department Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Chef Conservator of Forests Central Southern Forest Region-I Khyber Pakhtunkhwa, Peshawar.
4. The Conservator of Forests Lower Hazra Forest Circle, Abbottabad.
5. Mr. Munawar Khan, Forest Ranger (BPS-16), SDFO (ACB), Demarcation Peshawar.
6. Mr. Rahim Khan, Forest Ranger (BPS-16), SDFO (ACB), Wana Forest Sub Division, South Waziristan Forest Division.
7. Mr. Quaid-e-Azam, Forest Ranger (BPS-16), SDFO (ACB), Teri Forest Range, Kohat Forest Division.
8. Mr. Mir Afzal, Forest Ranger (BPS-16), SDFO (ACB), Hangu, Forest Sub Division, Kohat Forest Division.
9. Mr. Wisal Khan, Forest Ranger (BPS-16), SDFO (ACB), Dargai, Forest Sub Division, Malakand Forest Division.
10. Mr. Muqaid Ullah, Forest Ranger (BPS-16), SDFO (ACB), Petrol Squad, Malakand West Forest Circle, Timergara.

- 11. Mr. Muhammad Ilyas, (Retired-SDFO) Khar Forest Range, Bajaur Forest Division.
- 12. Mr. Sher Amanullah SDFO, Lower Mohmand Range, Mohmand Forest Division.
- 13. Mr. Hameed Ullah (Retired-SDFO) Shakh Badin Range D.I. Khan Forest Division.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 FOR CORRECTION OF SENIORITY POSITION OF THE APPELLANT IN THE FINAL SENIORITY LIST OF FOREST RANGER (BPS-16) DATED 09.09.2021 AND DATED 24.01.2023 AS PER ORDER OF MERIT ASSIGNED BY THE KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION, AGAINST WHICH THE APPELLANT FILED DEPARTMENTAL APPEAL ON 21.03.2023, WHICH WAS TURNDOWN/REJECTED BY THE RESPONDENTS VIDE REJECTION ORDER/MEMO DATED 29.03.2023.

PRAYER

ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER/LETTER DATED 29.03.2023 MAY KINDLY BE SET ASIDE AND THE SENIORITY LIST OF THE FOREST RANGER (BPS-16) MAY PLEASE BE CORRECTED AND THE APPELLANT MAY BE PLACED AT PROPER PLACE "BELOW TO JUNAID ALAM" IN SENIORITY LIST ACCORDING TO THE ORDER OF MERIT ASSIGNED BY THE KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION BY BRINGING HIS NAME AT PAR WITH HIS BATCH MATES, BEING IGNORED AND DISCRIMINATED BY THE RESPONDENT DEPARTMENT IN VIOLATION OF LAW & RULES. AND AGAINST THE SECURED FUNDAMENTAL RIGHTS OF THE APPELLANT, THE APPELLANT MAY ALSO ALLOWED ALL BACK/ CONSEQUENTIAL BENEFITS. ANY REMEDY DEEMS

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**JUST AND PROPER MAY ALSO BE ALLOWED IN
FAVOR OF THE APPELLANT.**

RESPECTFULLY SHEWETH:

FACTS:

1. That the Khyber Pakhtunkhwa Public Service Commission advertised various posts including the posts of Forest Ranger BPS-16 and the appellant being eligible applied for the said post.
2. That after the proper selection process, the appellant was recommended for the post of Forest ranger (BPS-16) vide dated 21.07.2017 and inter-seniority was also issued by the Khyber Pakhtunkhwa Public Service Commission wherein the appellant stood at Sr. No.10 after Junaid Alam and Muhammad Sajjad, however Muhammad Sajjad did not join the post. **(Copy of recommendation letter dated 21.07.2021 is attached as annexure-A)**
3. That on recommendation of KP Public Service Commission, the respondent department nominated the appellant for mandatory Training and after completion of the training the appellant was appointed on the post of Forest Ranger BPS-16 vide office order dated 13.01.2020 in which it was mentioned in (viii) terms and condition that their inter-seniority should be determined in the light of the merit order drawn by the Khyber Pakhtunkhwa Public Service Commission. **(Copy of appointment order dated 13.01.2020 is attached as Annexure-B)**
4. That since his appointment the appellant is performing his duties with devotion and honesty whatsoever assigned to him and no complaint has been filed regarding his performance.
5. That the final seniority list of Forest Ranger (BPS-16) stood on 30.06.2021 was issued on 09.09.2021, wherein the appellant was not placed as per order of merit of the KP Public Service Commission and placed below than the private respondents No. 05 to 13. The name of the appellant was entitled to be placed below than Junaid Alam as he was below than Junaid Alam in the order of merit assigned by the Public Service Commission, but he was placed at Sr. No. 25 below than the private respondent No. 05 to 13, however, final seniority list dated 09.09.2021 was never communicated to the appellant and when final seniority list of Forest Ranger (BPS-16) stood on 20.01.2023 was issued on 24.01.2023, the appellant received final seniority list dated

20.01.2023, where he came to know that he was not placed as per order of merit and was wrongly placed below than the private respondents in the final seniority list dated 24.01.2023 and his colleagues who were appointed along with the appellant in the same advertisement were not present in the final seniority list dated 24.01.2023 and on his request final seniority list dated 09.09.2021 was also provided to him. **(Copies of seniority list dated 09.09.2021 and 24.01.2023 are attached as Annexure-C&D)**

6. That the appellant was recommended by the KP Public Service Commission on 21.07.2017 as Forest Ranger (BPS-16) along with his colleagues and was below than Juniad Alam in the order of merit assigned by the Commission and was to be placed below than Junaid Alam in final seniority list of Forest Ranger (BPS-16), but he was placed below than the private respondents No. 5 to 13, who were promoted to the post of Forest Ranger (BPs-16) much after the appointment of the appellant on 10.01.2019 and as the appellant was not properly placed in the seniority list of Forest Ranger (BPS-16) according to order of merit assigned by the Commission, therefore he filed departmental appeal for correction of his position in the final seniority list of Forest Ranger (BPS-16) dated 09.09.2021 and 24.01.2023 according to the merit of order assigned by the Commission, which was rejected on 29.03.2023 for no good grounds. **(Copies of departmental appeal and rejection order/letter dated 29.03.2023 are attached as Annexure-E&F)**
7. That the appellant has no other remedy except to file the instant appeal for redressal of his grievance in this august Tribunal on the following grounds amongst others.

GROUND

- A. That the appellant has not been treated in accordance with law and rules, hence his rights secured and guaranteed under the law are badly violated.
- B. That the impugned seniority list of Forest Ranger (BPS-16) dated 09.09.2021 and 24.01.2023 are against the law and rules on the subject, the department have never taken into consideration to settled principles governing seniority/promotion before issuance of the final seniority list.
- C. That the appellant was never conveyed any reason due to which he was not placed at his due seniority according to the merit position assigned

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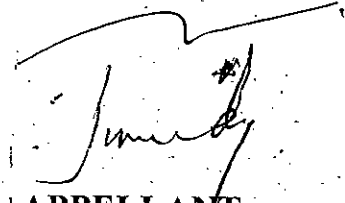
by the KP Public Service Commission for the purpose of inter-se-seniority.

- D. That according to Section-17 of APT Rules 1989, it is the legal right of every civil servant to be placed in seniority list according to his inter-se-seniority, but the same benefit was not extended to the appellant which is the violation of Section-17 of APT Rules 1989.
- E. That it is clearly mentioned in viii of terms and condition of the appointment order dated 13.01.2020 of the appellant, that inter-se-seniority should be determine in the light of the merit order drawn by KP Public Service Commission, but despite that the appellant was not placed in the seniority list of Forest Ranger (BPS-16) according to the inter-se-seniority which means that the respondents themselves violated viii of terms and condition of the appointment order of the appellant by wrongly placed the name of the appellant I the seniority list of Forest Ranger.
- F. That not placing the name of the appellant below to Junaid Alam according to inter-se-seniority in the final seniority list of Forest Ranger (BPs-16) is illegal unlawful, violative upon the rights of the appellant and is highly discriminated.
- G. That the respondents are not acting in accordance with law and rules and not treating the appellant alike.
- H. That the conduct of the respondents is apparently tainted with malice, malafide and bias, similarly favouritism and nepotism prevailed in the process of seniority, thus the impugned seniority list so prepared is illegal, unlawful, violative upon the right of the appellant.
- I. That not considering the appellant on his due place of seniority from his due date/initial and delay/inaction on the part of the respondents is against the law, rules, facts norms of justice and material on record and also against the principle of fair play and equity.
- J. That the appellant has not been treated as per notified gazette rules by the respondents which deprived the appellant from his due right of seniority according to the rules.
- K. That the state is bound to ensure the elimination of all forms of exploitation and the gradual fulfillment of the fundamental principles. It

is also the duties of the state to remove disparity in the income and earning of individual under Article-37 & 38 of the Constitution.

- L. That inaction on the part of the respondents is adversely affecting the appellant service career, hence the proprietary demand that the appellant should be place his due place of seniority i.e after Junaid Alam according to inter-se-seniority in the final seniority list
- M. That the appellant was recommended by the Commission on 21.07.2017, while the private respondents No. 5 to 13, who were promoted on the post of Forest Ranger (BPs-16) much after the appointment of the appellant on 10.01.2019, but despite that they were placed above than the appellant in the seniority list of Forest Ranger, which is against the law and rules and as such the seniority list of Forest Ranger is liable to revised/correct by, placing the appellant above than the private respondent No.5 to 13.
- N. That not placing the appellant above than the private respondents in the impugned seniority lists will cause irreparable loss in the case of further promotion of the appellant, which is the legal right of the appellant of promotion on the basis of seniority.
- O. That the appellant seeks permission to advance other ground proof at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.



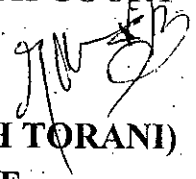
APPELLANT
Junaid Nazir

THROUGH:



(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT

&



(SHAKIR ULLAH TORANI)
ADVOCATE

(7)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2023

Junaid Nazir

VS

Forest Department

AFFIDAVIT

I, Junaid Nazir, Forest Ranger (BPS-16), SDFO (ACB), Jared Kaghan Forest Division Jabba, Mansehra, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.


DEPONENT


19-5-23

To

The Secretary to Govt. of Khyber Pakhtunkhwa,
Forestry, Environment & Wildlife Department.

Environment Department
Khyber Pakhtunkhwa

Subject:

RECRUITMENT TO NINE (09) POSTS OF FOREST RANGER (BPS-16) IN OFFICE OF CHIEF
CONSERVATOR OF FOREST (ENVIRONMENT DEPARTMENT) (ADVT. NO.01/2016, S.NO.06)

Dear Sir,

I am directed to refer to your letter No. SO (Estt)FE&WD/1-6/2K14-3685, dated 07.10.2015 on the subject noted above and to state that the Commission recommends the following candidates to the Government for appointment against the subject cited posts: -

1ST BLOCK

Vacancy Rotation	Allocation	Merit Order	Name with father's Name	District / Zone
8 th	Zone-1	05	Abdus Sattar S/O Nisar Muhammad	Moh:Agy/1
9 th	Merit	01	Sharif Ullah S/O Ghani Rehman	Swat/3
10 th	Zone-2	02	Zohaib Hassan S/O Qur Hassan Khan	Mardan/2
11 th	Zone-3	12	Muhammad Sajjad S/O Muhammad Pervaiz	Malakand/3
12 th	Zone-4	07	Junaid Alam S/O Farid Ullah Shah	Karak/4
13 th	Merit	03	Muhammad Junaid S/O Hazrat Meer	Charsadda/2
14 th	Zone-5	10	Junaid Nazir S/O Muhammad Nazir	Mansehra/5
15 th	Zone-1	06	Umar Khilab S/O Ajmal Khan	S.W Agy/1
16 th	Zone-2	04	Haseeb Arshad S/O Muhammad Arshad	Nowshera/2

2 Recommendation in favour of the recommendees is provisional subject to their medical fitness and verification of all the documents / testimonials by the Department.

3 Upto date zonal state is as under:

	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total
Share	04	03	03	02	02	02	16
Adjusted	04	03	03	02	02	02	16
Balance	—	—	—	—	—	—	Nil

4 Inter se seniority of the above recommendees is as under:

Inter-se seniority No.	Name with Father's Name	Domicile
1.	Sharif Ullah S/O Ghani Rehman	Swat/3
2.	Zohaib Hassan S/O Qur Hassan Khan	Mardan/2
3.	Muhammad Junaid S/O Hazrat Meer	Charsadda/2
4.	Haseeb Arshad S/O Muhammad Arshad	Nowshera/2
5.	Abdus Sattar S/O Nisar Muhammad	Moh:Agy/1
6.	Umar Khilab S/O Ajmal Khan	S.W Agy/1
7.	Junaid Alam S/O Farid Ullah Shah	Karak/4
10.	Junaid Nazir S/O Muhammad Nazir	Mansehra/5
12.	Muhammad Sajjad S/O Muhammad Pervaiz	Malakand/3

5 Original applications (with enclosures) of the above nine (09) recommendees are enclosed herewith for your record.

6 Kindly acknowledge receipt the same.

Yours faithfully,

Encl: As above.

(GHULAM DASTAGIR AHMAD)

OFFICE ORDER NO 70 DATED PESHAWAR THE 13 /01/2020 ISSUED BY
ALI GAUHER KHAN CHIEF CONSERVATOR OF FORESTS CENTRAL SOUTHERN FOREST
REGION-I KHYBER PAKHTUNKHWA PESHAWAR

8 Annex B 55

On the recommendations of Khyber Pakhtunkhwa Public Service Commission and successfully completing their training leading to B.Sc Degree in Forestry, the following candidates are hereby appointed as Forest Rangers (BPS-16) (Rs.18910-1520-64510) in the Khyber Pakhtunkhwa Forest Department subject to the terms and conditions as given here under:-

S.No.	Name with Father's Name
1.	Mr. Abdus Sattar S/O Nisar Muhammad Village Shahi Payan Post Office Shahi Bala District Peshawar
2.	Mr. Junaid Nazir S/O Muhammad Nazir Mohallah Lohar Banda District Mansehra.

Terms & Conditions

- i. They will get pay at the minimum of BPS-16 including usual allowances as admissible under the rules. They will also be entitled to annual increment as per existing policy;
- ii. They shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, all other laws applicable to the Civil Servants and the rules made there-under;
- iii. They shall, initially, be on probation for a period of one year extendable for further one year.
- iv. Their services shall be liable to termination at any time without assigning any reasons thereof before the expiry of the period of probation/extended period of probation, if their performance during this period is not found satisfactory, in such an event.
- v. In case they wish to resign at any time, fourteen days prior notice shall be necessary or in lieu thereof, fourteen days pay shall be forfeited.
- vi. They shall not be entitled to any TA/DA on their first appointment as Forest Rangers (BPS-16).
- vii. They shall undergo field training for a period of six months as per Forest Manual.
- viii. Their inter-se-seniority should be determined in the light of the merit order drawn by the Khyber Pakhtunkhwa Public Service Commission.

If the above terms and conditions are acceptable to them, they should submit arrival report to the Chief Conservator of Forests Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar, for duty within 14 days of issuance of this order.

Consequent upon above, the competent authority is further pleased to order their attachment/field training for post college training as noted against each hereunder for a period of six months.

S.#.	Name of Forest Ranger	From	Palace of attachment for field training
1.	Mr. Abdus Sattar	On arrival/joining Forest Department	Peshawar Forest Division at Nowshera
2.	Mr. Junaid Nazir	On arrival/joining Forest Department	Swat Forest Division

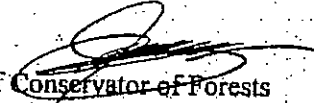
Sd/-

(A.G. Khan)

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Forest Region-II, Abbottabad.
2. Chief Conservator of Forests Malakand Forest Region-III, Saidu Sharif Swat.
3. Conservator of Forest Southern Circle Peshawar.
4. Director Budget & Accounts Government of Khyber Pakhtunkhwa Forestry, Environment and Wildlife Department Peshawar.
5. Section Officer (Establishment) Government of Khyber Pakhtunkhwa Forestry, Environment and Wildlife Department Peshawar.
6. Divisional Forest Officer Peshawar Forest Division Nowshera.
7. Divisional Forest Officer Swat Forest Division Swat.
8. Concerned Forest Rangers.
- ✓ 9. Personal file of concerned Forest Rangers.


Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

12

D

**GOVERNMENT OF KHYBER PAKHTUNKHWA
FOREST DEPARTMENT**

NOTIFICATION

in pursuance of Section 8 (1) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with rule-17 Civil Servants (Appointment, Promotion and Transfer) rules, 1989, the competent authority is pleased to notify/circulate final seniority list of Forest Rangers (BPS-16) Khyber Pakhtunkhwa Forest Department as it stood on 30/06/2021 for general information.

FINAL SENIORITY LIST OF FOREST RANGERS (BPS- 16) KHYBER PAKHTUNKHWA, FOREST DEPARTMENT AS IT STOOD ON 30/06/2021.

S.#	Name of officer	Academic Qualification	Date of Birth	Domicile	Date of first entry in to service	Regular appointment/ promotion to the present post			Present appointment with date	Remarks	Place of posting
						Date	BPS	Method of recruitment			
1.	Mr. Shabir Ahmad	B. Sc. Forestry	1/8/1967	Swat	26/9/2009 F/Ranger	26/9/2009	16	By Initial recruitment	BPS-16 26/9/09	Service regularized as per ordinance 2009.	RFO Lower Kurram
2.	Mr. Alamgir Khan	B. Sc. Forestry	3/1/1969	Swat	26/9/2009 F/Ranger	26/9/2009	16	-do-	BPS-16 26/9/09	-do-	SDFO Alpuri
3.	Mr. Riaz Hussain	B. A/FS	1/1/1964	Swat	14/3/1985	26.12.2014	16	By promotion	BPS-16 26.12.2014	-	RFO Demarcation
4.	Mr. Zareen Gul	BA/FS	1/4/1964	Buner	18/3/1985	14/11/2016	16	-do-	BPS-16 14/11/2016	-	SDFO Buner Watershed (appointed to the post of SDFO BPS-17 on acting charge basis)
5.	Mr. Sardar Salih	MA/FS	20/1/1972	Upper Dir	1/10/1990	14/11/2016	16	-do-	BPS-16 14/11/2016	-	RFO Sheringal
6.	Mr. Izzat Sher	B.A/FS	1/4/1967	Swat	1/10/1990	14/11/2016	16	-do-	BPS-16 14/11/2016	-	SDFO Bahrain South (appointed to the post of SDFO BPS-17 on acting charge basis)
7.	Mr. Sharifullah	B. Sc Forestry	2/3/1995	Swat	17/10/2017	17/10/2017	16	By initial recruitment	17/10/2017	-	Incharge SDFO Matta
8.	Mr. Zohaib Hassan	B. Sc Forestry	12.11.1992	Mardan	17/10/2017	17/10/2017	16	-do-	17/10/2017	-	Incharge SDFO Maknia Forest Sub-Division

9.	Muhammad Junaid	B Sc Forestry	20.9.1994	Charsadda	17/10/2017	17/10/2017	16	By initial recruitment	17/10/2017	--	SDFO Upper Siran
10.	Mr. Umar Khitab	E. Sc Forestry M. Sc Forestry	6.4.1992	S.W. Agency	17/10/2017	17/10/2017	16	-do-	17/10/2017	--	Incharge SDFO Mingora
11.	Mr. Junaid Alam	B. Sc Forestry M. Sc Forestry	1.11.1993	Karrak	17/10/2017	17/10/2017	16	-do-	17/10/2017	--	Incharge SDFO Dunga Gali
12.	Mohammad Ilyas	FA/FS	10/4/1963	Mardan	30/6/1985	12/01/2018	16	by promotion	12/01/2018	--	RFO Khar Bajaur
13.	Mr. Sher Amanullah	Matric/FS	27/6/1965	FR Bannu	1/10/1986	12/01/2018	16	-do-	12/01/2018	--	RFO Lower Mohmand
14.	Mr. Sakhi Jan	Matric/FS	19/1/1966	Peshawar	1/10/1989	12/01/2018	16	-do-	12/01/2018	--	FR Tank Range
15.	Mr. Nadar Khan	FA/FS	3/2/1962	Lower Dir	1/10/1988	12/01/2018	16	-do-	12/01/2018	--	Kalkot Range
16.	Syed Abdul Wahid Bacha	BA/FS	3/2/1965	Lower Dir	1/10/1988	12/01/2018	16	-do-	12/01/2018	--	RFO Chakdara
17.	Mohammad Yaqoob	BA/FS	2/12/1961	L.Marwat	2/10/1984	12/01/2018	16	-do-	12/01/2018	--	RFO Wana
18.	Mr. Hameedullah	FA/FS	27/12/1962	L.Marwat	20/3/1985	12/01/2018	16	-do-	12/01/2018	--	Incharge SDFO Sheikh Buddin
19.	Mr. Munawar Khan	Matric	10/9/1964	L. Marwat	24/3/1985	10.01.2019	16	-do-	10.01.2019	--	RFO Paroa
20.	Mr. Rahim Khan	F. Sc	15/3/1964	Mardan	30/9/1985	10.01.2019	16	-do-	10.01.2019	--	RFO Khyber
21.	Mr. Mir Afzal	F.A	20/3/1966	Hangu	1/1/1986	10.01.2019	16	-do-	10.01.2019	--	SDFO Hangu
22.	Mr. Wasit Khan	B.A	1/4/1966	Lower Dir	1/10/1988	10.01.2019	16	-do-	10.01.2019	--	RFO Batkhela
23.	Mr. Muqaid Khan	F.A	10/5/1966	Lower Dir	1/10/1988	10.01.2019	16	-do-	10.01.2019	--	Incharge SDFO Timergara
24.	Mr. Abdus Sattar	B Sc Forestry	08.01.1992	Mohmand Agency	13.01.2020	13.01.2020	16	By initial recruitment	13.01.2020	--	Incharge Patrol Squad Circle Southern
25.	Mr. Junaid Nazir	B.Sc Forestry	22.07.1995	Mansehra	13.01.2020	13.01.2020	16	-do-	13.01.2020	--	RFO Working Plan Unit-IV, Abbottabad
26.	Mohammad Yousaf	Matric/FS	11/7/1969	Chitral	8/10/1987	19/7/2012	12	By promotion	14.04.2020	--	Incharge SDFO Drosh South
27.	Mr. Qaid Azam	B.A	1/1/1964	Karak	1/1/1986	14.04.2020	16	-do-	14.04.2020	--	RFO Teri
28.	Mr Atta Ullah	M. Sc Botany	14/08/1989	Nowshera	17/05/2011	14.04.2020	16	-do-	14.04.2020	--	RFO Nawagai

14

12

29.	Mr. Hamayun	BA	01/01/1963	Swat	1/10/1986	14.04.2020	16	By promotion	14.04.2020	-	RFO Demarcation Swat
30.	Muhammad Wali	FA	04/04/1963	Malakand Agency	1/10/1986	14.04.2020	16	-do-	14.04.2020	-	RFO Kailang
31.	Mr. Hassan Raza	BS (Botany) M. Phil (Botany)	09/4/1990	Orakzai Agency	6/9/2016	10/03/2021	16	-do-	10/03/2021	-	RFO Upper Kurram

No. 972-76 L. Dated Peshawar The 09/09/2021.

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Forest Region-II, Abbonakad.
2. Chief Conservator of Forests Malakand Forest Region-III, Saidu Sharif Swat.
3. Conservator of Forests Forestry Planning & Monitoring Circle Peshawar.
4. Conservator of Forests Newly Merged Areas Forest Circle Peshawar
5. Conservator of Forests Southern Circle Peshawar.

They are requested to circulate the seniority list amongst the concerned RFOs and report their observations/omission if any within a period of one month, so that the seniority list could be issued as final.

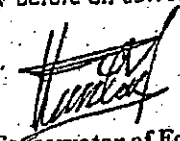
No. 1642-43 /E-13

dated 15/09/2021

Copy forwarded to the:-

1. All Divisional Forest Officers in Southern Circle.
2. Sub-Divisional Forest Officer Patrol Squad of Southern Circle Peshawar.

For information and necessary action. They are requested to circulate the seniority list amongst the concerned RFOs and report their observations / omission if any before on 05.10.2021, so that the seniority list could be issued as final.


Conservator of Forests
Southern Circle Peshawar

SDFOs PLS

**GOVERNMENT OF KHYBER PAKHTUNKHWA
FOREST DEPARTMENT**

NOTIFICATION

In pursuance of Section 8 (1) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with rule-17 Civil Servants (Appointment, Promotion and Transfer) rules, 1989, the competent authority is pleased to notify/circulate final seniority list of Forest Rangers (BPS-16) Khyber Pakhtunkhwa Forest Department as it stood on 20/01/2023 for general information.

**FINAL SENIORITY LIST OF FOREST RANGERS (BPS-16) KHYBER PAKHTUNKHWA, FOREST DEPARTMENT AS IT STOOD
ON 20/01/2023.**

S.#	Name of officer	Academic Qualification	Date of Birth	Domicile	Date of first entry in to service	Regular appointment/ promotion to the present post			Present appointment with date	Remarks	Place of posting
						Date	BPS	Method of recruitment			
1	Mr. Riaz Hussain	B. AIFS	1/1/1964	Swat	14/3/1985	26.12.2014	16	By promotion	BPS-16 26.12.2014	-	RFO Demarcation
2	Mr. Munawar Khan	Matric	10/9/1964	L. Marwat	24/3/1985	10.01.2019	16	By promotion	10.01.2019	-	SDFO Demarcation Peshawar (Appointed to the post of SDFO (BPS-17) on ACB)
3	Mr. Rahim Khan	F. Sc	15/3/1964	Mardan	30/5/1985	10.01.2019	16	-do-	10.01.2019	-	SDFO Wana (Appointed to the post of SDFO (BPS-17) on ACB)
4	Mr. Quid-e-Azam	B.A	1/1/1964	Karak	1/1/1986	10/01/2019	16	-do-	10/01/2019	-	RFO Ten (Appointed to the post of SDFO (BPS-17) on ACB)
5	Mr. Mr Afzal	F.A	20/3/1966	Hangu	1/1/1986	10.01.2019	16	-do-	10.01.2019	-	SDFO Hangu (Appointed to the post of SDFO (BPS-17) on ACB)
6	Mr. Wasil Khan	B.A	1/4/1966	Lower Dir	1/10/1988	10.01.2019	16	-do-	10.01.2019	-	SDFO Dargai (Appointed to the post of SDFO (BPS-17) on ACB)
7	Mr. Muqad Ullah	F.A	10/5/1966	Lower Dir	1/10/1988	10.01.2019	16	-do-	10.01.2019	-	SDFO Patrol Squad Timergara (Appointed to the post of SDFO (BPS-17) on ACB)
8	Mr. Abdus Sattar	B.Sc Forestry	08.01.1992	Mohmand Agency	13.01.2020	13.01.2020	16	By initial recruitment	13.01.2020	-	Incharge SDFO FP & M Circle (Appointed to the post of SDFO)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
FOREST DEPARTMENT**

Notification:-

In pursuance of Section 8 (1) of the Khyber Pakhtukhwa Civil Servants Act, 1973, read with Rule-I Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 the competent authority is pleased to notify final seniority list of Forest Rangers (BPS-16) Khyber Pakhtunkhwa Forest Department as it stood on 20.01.2023 for general information.

FINAL SENIORITY LIST OF FOREST RANGERS (BPS-16) KHYBER PAKHTUNKHWA, FOREST DEPARTMENT AS IT STOOD ON 20.01.2023

Sl. No.	Name of Officer	Academic Qualification	Date of Birth	Domicile	Date of First entry into service	Regular Appointment/Promotion to the present post			Present Appointment with date	Remarks	Place of Posting
						Date	BPS	Method of Recruitment			
1.	Mr. Riaz Hussain	B.A/F.Sc	1/1/1964	Swat	14/3/1985				BPS-16 26.12.2014		RFO Demarcation
2.	Mr. Munawar Khan	Matric	10/9/1964	L. Marwat	24/3/1985	26.12.2014	16	By promotion	10.01.2019		SDFO Demarcation Peshawar (Appointed to the post of SDFO (BPS-17) on ACB
						10.01.2019	16	-do-			
3.	Mr. Rahim Khan	F.Sc	15/3/1964	Mardan	30/9/1986	10.01.2019	16	-do-	10.01.2019		SDFO Wana (Appointed to the post of SDFO (BPS-17) on ACB
4.	Mr. Quaid-e-Azam	B.A	1/1/1964	Karak	1/1/1986	10.01.2019	16	-do-	10.01.2019		RFO Ten (Appointed to the post of SDFO (BPS-17) on ACB
5.	Mr. Mir Afzal	F.A	20/3/1966	Hangu	1/1/1986	10.01.2019	16	-do-	10.01.2019		SDFO Hangu (Appointed to the post of SDFO (BPS-17) on ACB
6.	Mr. Wasil Khan	B.A	1/4/1966	Lower Dir	1/10/1988	10.01.2019	16	-do-	10.01.2019		SDFO Dargai (Appointed to the post of SDFO (BPS-17) on ACB
7.	Mr. Muqaid Ullah	F.A	10/5/1966	Lower Dir	1/10/1988	10.01.2019	16	-do-	10.01.2019		SDFO Patrol Squad Timergara (Appointed to the post of SDFO (BPS-17) on ACB
8.	Mr. Abdus Sattar	B.Sc Forestry	08/01/1992	Mohmand Agency	13.01.2020	13.01.2020	16	-do-	13.01.2020		Incharge SDFO FB & M Circle (appointment to the post of SDFO)

9	Mr. Aunad Nazer	B.Sc Forestry	22/07/1995	Mansehra	13/01/2020	13/01/2020	16	By promotion	13/01/2020	13/01/2020	16	By promotion	14/04/2020		13/01/2020						
10	Mohammed Yusef	M.Sc/F.S.	11/7/1989	Chitral	8/10/1997	19/7/2012	12	-do-	14/04/2020	19/7/2012	12	By promotion	14/04/2020		14/04/2020						
11	M. Saad	M.Sc Botany	14/08/1989	Nowshera	17/05/2011	14/04/2020	16	-do-	14/04/2020	17/05/2011	16	-do-	14/04/2020		14/04/2020						
12	Muhammad Waqar	FA	04/04/1983	Melakand	1/10/1986	14/04/2020	16	-do-	14/04/2020	04/04/1983	16	-do-	14/04/2020		14/04/2020						
13	Mr. Hassan Raza	BS (Botany) M.Phil. (Botany)	09/4/1990	Agency	6/9/2016	10/03/2021	18	-do-	10/03/2021	09/4/1990	18	-do-	14/04/2020		14/04/2020						
14	Mr. Khurshid Khan	B.A	02/12/1963	Abotabad	5/12/1981	02/2/2022	18	-do-	02/2/2022	02/12/1963	18	-do-	10/03/2021		10/03/2021						
15	Mr. Abdur Rashid	M.Sc	01/01/1968	D.I. Khan	02/01/1986	28/6/2022	18	By promotion	02/2/2022	01/01/1968	18	By promotion	02/2/2022		02/2/2022						
16	Mr. Aunad Nazer	M.Sc	05/12/1964	Charsadda	02/10/1986	02/2/2022	18	-do-	02/2/2022	05/12/1964	18	-do-	02/2/2022		02/2/2022						
17	Mr. Umar Farooq	B.A	04/03/1965	Nowshera	01/10/1986	02/2/2022	18	-do-	02/2/2022	04/03/1965	18	-do-	02/2/2022		02/2/2022						
18	Mr. Jawed-ur-Rehman	M.Sc	15/02/1967	Kohat	01/10/1986	02/2/2022	18	-do-	02/2/2022	15/02/1967	18	-do-	02/2/2022		02/2/2022						
19	Muhammad Ali (FNU)	M.Sc	03/04/1968	Kohat	06/06/1987	02/2/2022	18	-do-	02/2/2022	03/04/1968	18	-do-	02/2/2022		02/2/2022						
20	Muhammad Anwar	M.Sc	01/05/1965	Kohistan	01/10/1983	02/2/2022	18	-do-	02/2/2022	01/05/1965	18	-do-	02/2/2022		02/2/2022						
21	Mr. Ghani-ur-Hussain	B.A	15/03/1963	Kuram Agency	16/08/1987	02/2/2022	16	-do-	02/2/2022	15/03/1963	16	-do-	02/2/2022		02/2/2022						
22	Mr. Shoukat Hussain	B.A	04/06/1963	Kuram Agency	16/08/1987	02/2/2022	16	-do-	02/2/2022	04/06/1963	16	-do-	02/2/2022		02/2/2022						
23	Mr. Ishfaq Ahmad	M.Sc	20/12/1991	Swat Agency	08/10/2018	02/2/2022	16	-do-	02/2/2022	20/12/1991	16	-do-	02/2/2022		02/2/2022						
24	Mr. Nauman Ullah	M.Sc	15/2/1997	FR/Banhal	09/03/2022	09/03/2022	16	-do-	02/2/2022	15/2/1997	16	-do-	02/2/2022		02/2/2022						
25	Mr. Adnan Nawab	B.S Forestry	7/12/1993	Swat	23/7/2022	23/7/2022	16	By initial recruitment	09/03/2022	09/03/2022	16	By initial recruitment	09/03/2022		09/03/2022						
26	Mr. Saqib Aftab	M.Sc	16/9/1993	Buner	09/03/2022	09/03/2022	16	-do-	09/03/2022	16/9/1993	16	-do-	09/03/2022		09/03/2022						
27	Muhammad Ulta Khan	B.Sc Forestry	30/7/1999	Bannu	15/2/2022	15/2/2022	18	-do-	09/03/2022	30/7/1999	18	-do-	09/03/2022		09/03/2022						
28	Muhammad Akbar Bakkor	B.A	24/9/1998	Abotabad	15/7/2022	15/7/2022	18	-do-	09/03/2022	24/9/1998	18	-do-	09/03/2022		09/03/2022						
29	Mr. Mehdi Khan	B.A	01/04/1963	Bosher	01/10/1988	28/6/2022	18	-do-	09/03/2022	01/04/1963	18	-do-	09/03/2022		09/03/2022						
30	Mr. Naveed Zaheer	F.A	03/07/1968	Melakand	01/10/1988	28/6/2022	18	-do-	09/03/2022	03/07/1968	18	-do-	09/03/2022		09/03/2022						

(U) 212/A/AC/BI
 SDO Upper
 Attached with CCF-1
 Office
 RFO Lower
 Mohmand
 RFO Kathang

SDO Upper
 Kuram
 SDO Kathang
 Seniorly mentioned vide CCF-1, O/O NO 85, dated 25/10/2022 (waiting for retention)
 SDO Khyber
 Waiting for posting
 RFO Working Place

RFO FR Kathang
 RFO Parrot Singh
 Malakand
 RFO Lower Kuram
 RFO Lower Kohistan

RFO Lower
 Kuram
 RFO Lower
 Kohistan

								-do-			(BPS-17) on ACB
9.	Mr Junaid Nazir	B.Sc Forestry	22/7/1995	Mansehra	<u>13.01.2020</u>	<u>13.01.2020</u>	16	-do-	13.01.2020	-	SDFO Jared
10.	Mohammad Yousaf	Maths/FS	11/7/1969	Chitral	<u>08.10.1987</u>	<u>19.7.2012</u>	12	-do-	14.04.2020	-	Attached with CCF-I Office
11.	Mr. Ullah	M.Sc Botany	14/08/1989	Nowshera	<u>17.05.2011</u>	<u>14.04.2020</u>	16	-do-	14.04.2020	-	RFO Lower Mohmand
12.	Mr. Hassan Raza	FA	04/04/1963	Malakand Agency	<u>01.10.1986</u>	<u>14.04.2020</u>	16	-do-	14.04.2020	-	RFO Katiang
13.	Mr. Hassan Raza	BS (Botany) M.Phil (Botany)	09.04.1990	Orakzai Agency	<u>06.09.2016</u>	<u>10.03.2021</u>	16	-do-	10.03.2021	-	SDFO Upper Kurram
14.	Mr. Khurshid Khan	B.A	02.12.1963	Abbotabad	<u>05.12.1981</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	SDFO Haripur
15.	Mr. Abdur Rashid	Matric	01.01.1968	D.I Khan	<u>02.01.1986</u>	<u>28.06.2022</u>	16	-do-	02.02.2022	-	Seniority restored vide CCF-I O/O No.85, dated:25.10.2022 (waiting for posting)
16.	Mr. Aurangzeb	Matric	05.12.1964	Charsadda	<u>01.10.1986</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	SDFO Khyber
17.	Mr. Umar Farooq	B.A	04.03.1965	Nowshera	<u>01.10.1986</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	Waiting for posting
18.	Mr. Javed Ur Rehman	Matric	15.02.1967	Kohat	<u>01.10.1986</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	RFO Working Plan
19.	Muhammad Ali Hilal	Matric	03.04.1968	Kohat	<u>06.06.1987</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	RFO FR Kohat
20.	Muhammad Anwar	Matric	01.05.1965	Kohistan	<u>01.10.1983</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	RFO Patrol Squad Mansehra
21.	Mr. Ghayoor Hussain	B.A	15.03.1963	Kurram Agency	<u>16.08.1987</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	RFO Lower Kurram
22.	Mr. Shaukat Hussain	B.A	04.06.1963	Kurram Agency	<u>16.08.1987</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	RFO Working Plan
23.	Mr. Ishfaq Ahmad	M.Sc	20.12.1991	Swat	<u>08.10.2018</u>	<u>02.02.2022</u>	16	-do-	02.02.2022	-	Working Plan Unit-VI Mingora Swat
24.	Mr. Nauman Ullah	M.Sc Forestry	15.2.1992	FR/Bannu	<u>09.03.2022</u>	<u>09.03.2022</u>	16	-do-	09.03.2022	-	SDFO Bannu
25.	Mr. Adnan Nawab	B.S Forestry	2/12/1993	Swat	<u>23.02.2022</u>	<u>23.02.2022</u>	16	-do-	23.02.2022	-	RFO Fatehpur
26.	Mr. Sajid Ali	M.Sc Forestry	16.09.1993	Buner	<u>09.03.2022</u>	<u>09.03.2022</u>	16	-do-	09.03.2022	-	RFO Patrol Squad Malakand West
27.	Mohib Ullah Khan	B.Sc Forestry	30.03.1999	Bannu	<u>15.03.2022</u>	<u>15.03.2022</u>	16	-do-	15.03.2022	-	RFO Working plan
28.	Muhammad Abu Bakar	Bs Forestry	24.09.1998	Abbotabad	<u>15.03.2022</u>	<u>15.03.2022</u>	16	-do-	15.03.2022	-	RFO Working Plain
29.	Mr. Mujtaba Khan	B.A	01.04.1963	Buner	<u>01.10.1988</u>	<u>28.06.2022</u>	16	-do-	28.06.2022	-	RFO
30.	Mr. Noor Zameen	F.A	03.07.1968	Malakand	<u>01.10.1988</u>	<u>28/6/2022</u>	16	-do-	28.06.2022	-	RFO Chakdara

1. Mr. Hanif Ahmad	B A	01.01.1964	PAF	01.10.1990	28/6/2022	16	do	28/6/2022
2. Mr. Sheraz Ahmad	C SA	15.04.1971	Charwadia	22.01.1992	28/6/2022	16	do	28/6/2022
3. Mr. Asim Mam	B A	30.04.1966	South Waziristan	05.06.1987	28/6/2022	16	do	28/6/2022
4. Muhammad Iqbal	B A	15.04.1963	Munsehra	30.09.1983	28/6/2022	16	do	28/6/2022
5. Muhammad Asif	B A	17.11.1967	Abbottabad	04.11.1989	28/6/2022	16	do	28/6/2022

It is certified:-

1. That the final seniority list has been circulated amongst the Officers.
2. That there is no seniority dispute amongst the Officers.
3. That none of the Officer has pointed/raised any objection pertaining to his seniority.

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa

No. KTR-21 E.

Dated Peshawar the 26/01/2022

Copies forwarded to:-

1. Chief Conservator of Forests, Northern Forest Region-II, Abbottabad.
2. Chief Conservator of Forests, Malakand Forest Region-III, Saidu Sharif Swat.
3. All Conservator of Forests in Khyber Pakhtunkhwa.
4. All Directors Integrated Operational Units in Khyber Pakhtunkhwa Peshawar.

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa

	Khan										
31.	Mr. Shabir Ahmad	B.A	01.04.1964	Swat	01.10.1990	28.06.2022	16	-do-	28.06.2022	-	
32.	Mr. Sheraz Ahmad	F.Sc	15.04.1971	Charsadda	22.01.1992	28.06.2022	16	-do-	28.06.2022	-	
33.	Mr. Noor Alam	B.A	20.04.1966	South Waziristan	06.06.1987	28.06.2022	16	-do-	28.06.2022	-	
34.	Muhammad Javed	F.A	15.04.1963	Mansehra	30.09.1985	28.06.2022	16	-do-	28.06.2022	-	
35.	Muhammad Asif	B.A	17.11.1967	Abbotabad	04.11.1989	28.06.2022	16	-do-	28.06.2022	-	RFO

It is certified:-

1. That the final seniority list has been circulated amongst the officers.
2. That there is not seniority dispute amongst the Officers.
3. That none of the Officer has pointed/raised any objection pertaining to his seniority.

**Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa, Peshawar**

No.8188-91/E,

Dated: Peshawar the 24.01.2023

Copy is forwarded to the:-

1. Chief Conservator of Forests Northern Forest Region-II, Abbotabad.
2. Chief Conservator of Forests Malakand Forest Region-III, Saidu Sharif Swat.
3. All Conservator of Forests in Khyber Pakhtunkhwa.
4. All Directors Integrated Specialized Units in Khyber Pakhtunkhwa

**Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa, Peshawar**

To

The Chief Conservator of Forests,
Central Southern Forest Region-I
Peshawar

Subject :

APPEAL FOR CORRECTION OF MY SENIORITY POSITION IN THE FINAL SENIORITY LIST OF FOREST POSITION IN THE FINAL SENIORITY LIST OF FOREST RANGER DATED 09/09/2021 & 20/01/2023, AS PER MERIT ASSIGNED BY KHYBER PAKHTUKHWA PUBLIC SERVICE COMMISSION.

Through:

Proper Channel

Respected sir,

It is submitted that I am performing my duty as SDFO, Jared and received a copy of Seniority list of RO's through DFO, Kaghan vide his letter No.2811-14/E dated 07/03/2023. From the perusal of seniority list following points are requested for your consideration.

1. I was selected KPPSC and was recommended for appointment as Forest Ranger (BPS-16), Vide Notification No.PSC/SR-IV/F-04/2017 Dated 21/07/2017.(Annexure-A)
2. Later on I was nominated for training course at Pakistan Forest Institute leading to B.sc degree in Forestry vide notification No. SO (Estt)/FE&WD/ 1-6/2015 dated 21/11/2017. (Annexure-B)
3. I am here to raise objection by filling a departmental appeal against the Seniority list in which the original seniority as per merit order (Inter-se-seniority) issued to me by KPPSC has not been assign to me . (Annexure-C)
4. It is also mentioned in my Appointment order that Inter-se-seniority shall be determined in the light of merit order drawn by KPPSC, but has not been placed according to my merit position (Annexure-C)
5. It is further added that period spent in training is a part of service, and it is a well settled law that date of joining duty is not a criteria for determination of seniority, seniority shall be reckoned on the basis of merit assign by KPPSC.

It is therefore requested to kindly revise the seniority list and assigned me the actual seniority position in the seniority list.

Thanks in Anticipation

Your Obediently

Junaid Nazir
SDFO Jared

Recd- 21/03/2023

CHIEF CONSERVATOR OF FORESTS
CENTRAL SOUTHERN FOREST REGION-I
KHYBER PAKHTUNKHWA



BHAMI ROAD PESHAWAR

PH 0911 9212177, Fax 0911

9211478

Email

ccforests@peshawar.gov.pk

Dated 29/03/2023

No. 9698 /E,
To

The Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

Subject: - APPEAL OF MR. JUNAID NAZIR RANGE FOREST OFFICER

Memo:- Reference your letter No. 8374/3E, dated 22/03/2023

Keeping in view the service rules notified vide Notification No. SO(Estt)/Env/1-466/2K5, dated 08/03/2007 & Para-3(d) of Chapter-II of the Notification bearing No. SOSR-II/FD/2-4/2021, dated 06/08/2021 by Govt of Khyber Pakhtunkhwa Finance Department, the appeal of Mr Junaid Nazir, Forest Ranger of Kaghan Forest Division Jabba is hereby rejected.

Qaim

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

Better copy

(17)

CHIEF CONSERVATOR OF FORESTS SHAMI ROAD PESHAWAR
CENTRAL SOUTHERN FOREST REGION-1 Dated 29/03/2023
KHYBER PAKHTUNKHWA
(HAD)

NO 9698/E

TO

The conservator of Forests
Lower Hazara Forests Circle
Abbottabad

Subject; **APPEAL OF JUNAID NAZIR RANGE FOREST OFFICER**

Memo.: Reference your letter No 9374/GE DATED 22/03/2023

Keeping in view the service notified vide notification No SO (Estt)/Env/1-465/2K5 dated 06/03/2007 & para -3(d) of chapter-II of the notification bearing No SOSR-II/FD/2-42021, dated 06/09/2021 by Govt of Khyber pakhtunkhwa Finance Department, the appeal of Mr. Junaid Nazir, Forest Ranger of Kaghan Forest division Jabba is hereby rejected.

Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa, Peshawar

VAKALAT NAMA

NO. _____/202

IN THE COURT OF KP Service Tribunal Peshawar

Junaid Nazir

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Foresi Department

(Respondent)
(Defendant)

I/We, Junaid Nazir

Do hereby appoint and constitute *Taimur Ali Khan, Advocate High Court 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 costs.

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. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/202

Junaid
(CLIENT)

ACCEPTED

TAIMUR ALI KHAN
Advocate High Court
BC-10-4240

CNIC: 17101-7395544-5
Cell No. 0333-9390916

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar

Shahid Ullah Torani
Advocate Peshawar