

Peshawar
10/08/23

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Service Appeal No. 747/2023

Fazal-e-Amin

Versus

Government of Khyber Pakhtunkhwa & Others

INDEX

S.No	Description of Documents	Annexures	Pages
1.	Reply to Service Appeal		1-4
2.	Affidavit		5
3.	Reply to Application for Suspension + Affidavit		6-7
4.	Copy of Office Order Dated 03-01-2008	"A"	8
5.	Copies of Allotment Orders of Respondent No. 05, & different official communication regarding vacation of House	"B to J"	9-18
6.	Copy of Office Order Dated 17-02-2014	"K"	19
7.	Copy of Allotment Order of Director NTFP Rashid Khan	"L"	20
8.	Copy of Application for Allotment	"M"	21-22
9.	Other Documents	"N"	23
10.	Wakalatnama		24.

Dated: 04-08-2023

Through

Respondent No. 05

Ahsan Sardar

&

Junaid Ur Rehman

Counsel - High Court(s)

①

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Service Appeal No. 747/2023

Khyber Pakhtun
Service Tribunal

Case No. 6879

Dated 04/08/23

Fazal-e-Amin, Junior Clerk (BPS-11) NTFP Head Office, Peshawar.

..... **Appellant**

VERSUS

1. The Secretary, Climate Change, Forestry, Environment & Wild Life Department, Government of Khyber Pakhtunkhwa.
2. The Chief Conservator of Forest, Central Southern Forest Region - I, Khyber Pakhtunkhwa.
3. The Deputy Director Non-Timber Forest Products, Khyber Pakhtunkhwa, Peshawar.
4. The Deputy Director Non-Timber Forest Products, Khyber Pakhtunkhwa, Peshawar.
5. Mr. Aerab Ali, Photographer (FOREST DEPARTMENT), Government of Khyber Pakhtunkhwa, Peshawar.

..... **Respondents**

PARA-WISE REPLY ON BEHALF OF RESPONDENT NO. 05

Preliminary Objections:

- A. **The Appellant has no locus standi to file the instant Service Appeal.**
- B. **The Appellant has concealed material facts from this Hon'ble Tribunal.**
- C. **The Appellant has not approached this Hon'ble Court with clean hands, instead smeared hands.**
- D. **The instant Service Appeal is bad for mis-joinder & non-joinder of necessary parties.**
- E. **The instant Service Appeal is not maintainable in its present form.**
- F. **The Appellant is estopped by his own conduct to present the instant Service Appeal.**
- G. **The instant Service appeal has laches, hence badly time barred and barred under the law.**

ON FACTS:

1. **Para No. 01** of the Appeal pertains to personal record of the Appellant, however, the Respondent No. 05 got onto the rolls of the Respondent department back in the year 2011 as a regular employee, having 12 years of standing, serving the Respondent Department.
2. **Para No. 02** of the Appeal is incorrect, hypocritic & misleading, hence denied sternly. As the issue has already been raised in the preliminary objections that the Appellant has concealed material and undeniable facts from this Hon'ble Tribunal. The father of the Appellant was allotted Quarter No. 01, instead of Quarter No. 03, back in the year 2010, vide Office Order No. 14 Dated 03-01-2008, But later-in-course, the same was exchanged without any speaking order and that too through personal approach. This scenario can be gauged from this fact alone that the father of the Appellant was although allotted Quarter No. 01, but the Appellant along-with his father is residing in Quarter No. 03. Moreover, the Application so filed by the Appellant is a forged one, having no diary number. **(Copy of Office Order Dated 03-01-2008 is annexed herewith as Annexure "A")**.
3. **Para No. 03** of the Appeal is incorrect, false, fabricated and vexatious, hence sternly denied. The Appellant has although brought the picture regarding allotment of Quarter No. 02 and has allegedly drawn the same analogy for allotment of Quarter No. 03 as well, but has failed to bring-forth another office order of the worthy Respondent No. 02 vide Office Order No. 1758/RA/RK/AA-02 Dated 13-12-2022, whereby clear-cut dictates were given to the Respondent No. 04, i.e. Director (NTFP) Peshawar that while dealing with Quarter No. 02, the Director was only allowed for taking necessary proceedings as a 'Special Case' while dealing with the allotment of Quarter No. 02. Furthermore, the Director NTFP was not instructed / allowed for allotting every single quarter, in light of office order No. 2572/RA/RK/AA-02 Dated 15-05-2019. Moreover, plenty of notices were issued by the Respondent No. 02 to Respondent No. 04 to vacate the house in question from the Appellant, but to no avail. **(Copies of Allotment Orders of Respondent No. 05, & different official communication regarding vacation of House are annexed herewith as Annexure 'B, C, D, E, F, G, H, I, & J' respectively)**.
4. **Para No. 04** of the Appeal is incorrect, false & misleading, hence denied. As per the directions of the Worthy Secretary to Government of Khyber Pakhtunkhwa, Environment Department, i.e. Respondent No. 01, vide Office Order No. SOG(ED)/4-7/2010 Vol II, Dated 17-02-2014, a House Allotment Committee got constituted under the Chairmanship of Respondent No. 02 to deal the matters, relating to allotment &

accommodation, but regardless of the notification mentioned above, the Director NTFP was in so hurry to allot the Quarter No. 03 to the Appellant, being a blue-eyed one. **(Copy of Office Order Dated 17-02-2014 is annexed herewith as Annexure "K")**.

5. **Para No. 05** of the Appeal is incorrect & misleading, hence denied. The Current Director NTFP, i.e. Respondent No. 03, used to be Deputy Director NTFP during the days of retirement of Darwesh Khan, back in the year 2021 & having good relations with Darwesh Khan & Appellant, the Current Director NTFP, Mr. Rashid Khan was in hurry to allot the Quarter No. 03 to the Appellant, which was accordingly done by him in an illegal & unlawful manner, without bringing the same fact into the knowledge of the Chief Conservator of Forests, i.e. Respondent No. 02. Although when the House in Question was allotted by the CCF-I to Respondent No. 05, the Current Director NTFP was time and again directed to cancel the allotment of the Appellant, but the Director being so stubborn didn't paid any heed towards the dictates of the CCF-I. Moreover, the same Director NTFP has also been allotted accommodation, and while dealing with the case of the accommodation of the Director NTFP, the accommodation was allotted by the Chief Conservator of Forests, meaning thereby that only the CCF-I under his chairmanship can allot the house for accommodation purposes to the employees, and the Director NTFP is not the competent one to do so. **(Copy of Allotment Order of Director NTFP Rashid Khan is annexed herewith as Annexure "L")**.
6. **Para No. 06** of the Appeal is incorrect, false & misleading, hence denied. The Appellant has never made any Departmental representation to the Respondent Department and the application so placed on file is just a escape to approach this Hon'ble Tribunal.
7. **Para No. 07** needs No Reply.

GROUND:

- A. **Ground "A"** of the Appeal is incorrect & denied. The Order Dated 08-11-2022 is Legal and has been made after following all codal formalities and upon the application of the Respondent No. 05 and that too through proper channel. **(Copy of Application for Allotment is annexed herewith as Annexure "M")**.
- B. **Ground "B"** of the Appeal is incorrect, false and fabricated, hence sternly denied. Allotment of Quarters, falling under the umbrella of Chief CCF-I has never remained under the domain of Director NTFP, rather, as stated in the facts, after constitution of House Allotment Committee back in the

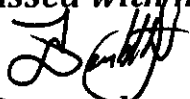
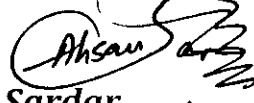

year 2014, all these powers were delegated to CCF-I being the Chairman of the committee to look into the matters, pertaining to allotments of accommodations.

- C. **Ground "C"** of the Appeal is incorrect & denied. True & detailed picture has already been portrayed above.
- D. **Ground "D"** of the Appeal is incorrect & denied. The Departmental Allotment Committee has no backing in the eyes of law, neither the Departmental Allotment Committee has ever been constituted, nor any directions of constituting the same has ever been made by the high-ups, hence the same order for allotment to the Appellant has been passed in vacuum by the illegal constituted Departmental Allotment Committee, nor the CCF-I was ever kept in loop.
- E. **Ground "E"** of the Appeal is incorrect & denied sternly. Proper reply has been furnished above.
- F. **Ground "F"** of the Appeal is incorrect & denied. The Appellant however refers to the Office Order Dated 22-11-2022, but have completely failed to annex replies and further communications in light of Office Order Dated 22-11-2022, which has already been annexed by the Respondent No. 05 vide Annexures "B to J" in the instant reply.
- G. **Ground "G"** of the Appeal is incorrect hence denied. The Appellant was time and again asked to vacate the house in question, but being adamant, the Appellant failed to comply by the Orders.
- H. The Respondent No. 05 also seeks permission of this Hon'ble Tribunal to raise other grounds during arguments.

It is therefore most humbly prayed that on acceptance of the instant Reply, the Service Appeal of the Appellant may kindly be dismissed with heavy costs.

Dated: 04-08-2023

Through


Respondent No. 05

Ahsan Sardar
&

Junaid Ur Rehman
Counsel / High Court(s)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

In Service Appeal No. 747/2023

Fazal-e-Amin

Versus

Government of Khyber Pakhtunkhwa & Others

Affidavit

I, Aerab Ali, Photographer, Forest Department, Government of Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Reply are true & correct & nothing has been concealed or mis-stated.

It is further stated on oath that in this Appeal, the answering Respondents have neither been placed ex-parte, nor their defence is struck-off

Deponent

CNIC: 17301-9118707-3

Cell No. 0312-9152756

Identified by:

Ahsan Sardar

Counsel - High Court(s)

(Adv).



BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Service Appeal No. 747/2023

Fazal-e-Amin

Versus

Government of Khyber Pakhtunkhwa & Others

Reply to Application for Suspension of Operations of Office Order No. 41
Dated 08-11-2022

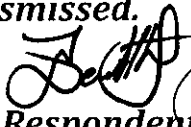
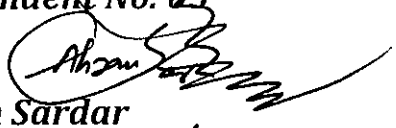

Respectfully Sheweth,

1. *Incorrect & denied.*
2. *Incorrect & denied. The Departmental Allotment Committee has got no backing in the eyes of law.*
3. *Incorrect & denied. The CCF-1 is the Chairman of the concerned committee, so constituted by the Secretary back in the year 2014.*
4. *Incorrect & denied. Proper reply has been given above.*
5. *Incorrect & denied.*
6. *Incorrect & denied.*

It is therefore most humbly prayed that the Application for suspension of Operation of Order Dated 08-11-2022 may kindly be dismissed.

Dated: 04-08-2023

Through


Respondent No. 05

Ahsan Sardar
&

Junaid Ur Rehman
Counsel - High Court(s)

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Service Appeal No. 747/2023

Fazal-e-Amin

Versus

Government of Khyber Pakhtunkhwa & Others

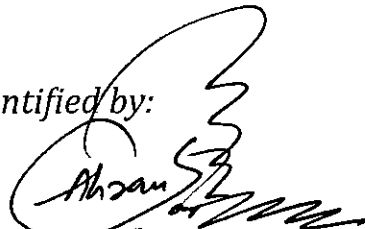
Affidavit

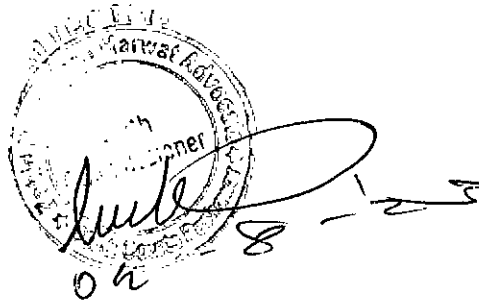
I, Aerab Ali, Photographer, Forest Department, Government of Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Reply are true & correct & nothing has been concealed or mis-stated.


Deponent

CNIC: 17301-9118707-3
Cell No. 0312-9152756

Identified by:


Ahsan Sardar
Counsel - High Court(s)



(8)

Ann A

OFFICE ORDER NO 14 DATED 3-1 2008, ISSUED BY
MR. RAJ MUHAMMAD DEPUTY DIRECTOR SERICULTURE/NTFP, NWFP
PESHAWAR.

The quarter No.1 at Sericulture Wing Shami Road Peshawar is vacated by
Mr. Muhammad Ayaz, Driver Peshawar is hereby allotted to Mr. Darwesh Khan, Office Assistant
of Sericulture Wing, Forest Department with effect from 21-01-2008. He should occupy the quarter
immediately otherwise the allotment will be cancelled.

SD/-
(RAJ MUHAMMAD)
DEPUTY DIRECTOR SERICULTURE
NON-TIMBER FOREST PRODUCTS
N.W.F. PROVINCE PESHAWAR.

No. 194-97 /DDS/NTFP Dated Peshawar the 3-1- 2008

Copy forwarded to the:-

1. The Assistant Director Sericulture/NTFP, NWFP, Peshawar.
2. Mr. Muhammad Ayaz (Driver) Head Office Peshawar. He is directed to hand over the quarter forthwith to Mr. Darwesh Khan (Asstt:).
3. Mr. Darwesh Khan (Asstt:) Head Office Peshawar with the direction to occupy the quarter forthwith.
4. ✓ The Disburser N.W.F.P. Peshawar.

DEPUTY DIRECTOR SERICULTURE/
NON-TIMBER FOREST PRODUCTS
N.W.F. PROVINCE PESHAWAR.

Attested

(9)

Ann "B"

Office Order No. 41 Dated Peshawar the 08 ¹¹/10/2022 issued by
Mr. Ejaz Qadir Chief Conservator of Forests Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar.

As recommended by Conservator of Forests Merged Areas Peshawar the quarter in Shami road Forest Colony as vacated by Mr. Darwaish Superintendent on his retirement is hereby allotted to Mr. Aerab Ali Photographer with immediate effect on the following terms and condition:-

TERMS AND CONDITIONS:

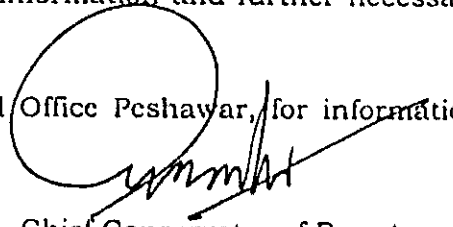
1. The Official shall submit occupation of his respective residence.
2. The Official shall use the premises for residential purposes only.
3. The Official shall not sublet the premises to any other person.
4. The existing design shall not be altered, otherwise the allotment shall be cancelled and legal action will be initiated against him.
5. He must clear the entire utility bills (Electricity/Gas/Water Charges) regularly on monthly basis.
6. If the premises are required to the Department for any other purpose he will vacate the house on a month notice.
7. He will not go in litigation to the Court against any order of the Department.

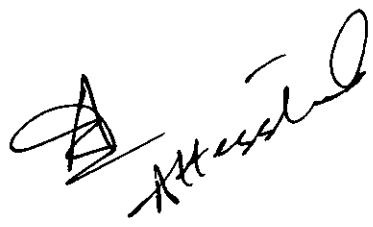
Sd-
(Ejaz Qadir)
Chief Conservator of Forest
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

No 1427-29 /RA/RK

Copy forwarded to:

1. Conservator of Forests Merged Areas Peshawar, for information and further necessary action.
2. Director NTFP Directorate Peshawar, for information and further necessary action.
3. Divisional Forest Officer (Direction) Head Office Peshawar, for information and further necessary action.


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



Ann
"C"

10



Office of the
DIRECTOR
Non-Timber Forest Products
Khyber-Pakhtunkhwa
Peshawar



ADDRESS: Khyber Pakhtunkhwa Forest Department Shami Road, Peshawar
Ph: 091-9211480 Fax:091-9213227 E-mail: directoratofntfp@gmail.com
D-NTFP / Estt /Khyber-Pakhtunkhwa Dated Peshawar the 22 /11 /2022

760

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

SUBJECT:

ALLOTMENT OF CATEGORY IV QUARTER NO.03.

Reference:

Your office order No.14 dated:08/11/2022

It is conveyed to your good self that the concerned quarter has
been allotted to Mr. Fazale Amin, NTFP Junior Clerk vide order No.42
dated 07-05-2021 in pursuance of your clear instruction/ Direction vide No.
2021/NTFP/GAA-02 dated: 24-05-2019. (Copy attached)

In view of the above your honor is requested to revisit the order
issued in this regard please.

Director
Non-Timber Forest Products
Khyber Pakhtunkhwa
Peshawar

817
23/11

R.A
23/11
CCF-1

Office of the Chief Conservator
Diary No. 8644
Dated: 23/11/22
Khyber Pakhtunkhwa Forest Department

Attested

11

Ann
"D"

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



SHAMI ROAD PESHAWAR
Ph: +92 91 9212177, Fax: +92 91 9211478
E-mail: ccfforests.pesh@gmail.com

No. 1758 /RA/RK/AA-02

Dated 13 / 12 / 2022

To

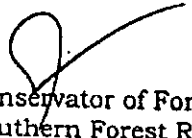
Director
NTFP Directorate
Peshawar


Subject: - ALLOTMENT OF QUARTER IN SHAMI ROAD FOREST COLONY
VIDE OFFICE ORDER NO.41 DATED 08.11.2022.

Memo: *In continuation to this office Order No.41 dated 08.11.2022 and your office letter No.760/D-NTFP dated 22.11.2022.*

Refer this office correspondence cited above, it is intimated that this office vide Office Order No. 273 dated 15.05.2019, endorsement No. 2503-06/RA/RK dated 15.05.2019 & letter No. 2572/RA/RK dated 24.05.2019, only allowed your good office for taking necessary proceeding as a special case for Quarter No. 02 situated at Shami Road Peshawar. Furthermore, you were not instructed/ allowed for allotting every other quarter in light of this office Order cited above. Keeping in view the above, you are requested to proceed as per law for vacation of the said quarter from ex-superintendent and handover to allottee to occupy the same.

Moreover, you are requested to vacate the said quarter with immediate effect. *27.05.2021*


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

 *Attended*

12

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



SHAMI ROAD PESHAWAR
Ph: 92 91 9212177, Fax: 92 91 9211478
E-mail: ccforests.pesh@gmail.com

Ann "E"

No. 2225 /RA/RK/BE-05

Dated 18 / 01 / 2023

To: The Director,
Non-Timber Forest Products
Peshawar

Subject: **FINAL NOTICE REGARDING VACATION OF RESIDENTIAL QUARTER.**

Reference to this office Order No.41 dated 08/11/2022

P-367

You have already been directed vide this office letter No.1758/RA/RK/AA-02 dated 13/12/2022 to vacate category IV residential Quarter of Mr. Darwesh Khan Ex-Sub-intendent situated at Shami Road but to no avail disregarding the directives of on constant basis tantamount to gross misconduct. You are therefore once again directed the same within 04 days most positively. In case of failure on your part to comply with the directives issued by this office, disciplinary action will be initiated against you under the E&D Rules,2011.

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

No. 2324 /RA/RK

Copy forwarded to the Incharge Establishment Head Office Peshawar for information.

18/01
Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

Attested

13

Ann " E "

	<p>Office of the DIRECTOR Non-Timber Forest Products Khyber Pakhtunkhwa Peshawar</p>	
<p>ADDRESS: Khyber Pakhtunkhwa Forest Department Shami Road, Peshawar Ph: 091-9211480 Fax: 091-9213227 E-mail: director@ntfp@gmail.com</p>		
<p>No. D-NTFP / Estt / Khyber Pakhtunkhwa Dated Peshawar the /01 /2023</p>		

To: Mr. Fazale Amin
Junior Clerk NTFP
Headquarter Peshawar

SUBJECT: NOTICE REGARDING VACATION OF RESIDENTIAL QUARTER P-339

Memo: Reference to CCF-I office order No.41 dated 08/11/2022

You are directed to vacate Category IV residential quarter situated at Shami Road, Peshawar within (07) days most positively.

In case of failure on your part to comply with directives issued by CCF-I, disciplinary action will be initiated against you under the E&D rules 2011

Director
Non-Timber Forest Products
Khyber Pakhtunkhwa
Peshawar.

Dated Peshawar the 25/01/2023

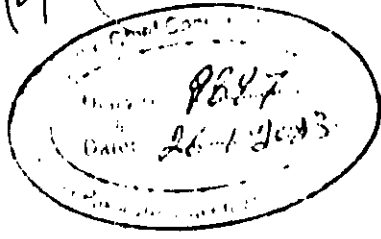
No 1216 / D-NTFP / Estt

Cop; forwarded to the Chief Conservator of Forests Central Southern Forest Region I, Khyber Pakhtunkhwa Peshawar for favour of information please

RA
27/01
2023

1142
26/01

Director
Non-Timber Forest Products
Khyber Pakhtunkhwa
Peshawar.



Attest

CONSERVATOR OF FORESTS
SOUTHERN FOREST REGION-I
KHYBER PAKHTUNKHWA
(HAD)



SHAMI ROAD PESHAWAR
Ph: +92 91 9212177, Fax: +92 91 9211478
E-mail: ccfforests.pesh@gmail.com

/RA/RK/AA-02

Dated 06 / 02 / 2023

The Director,
Non-Timber Forest Products
Peshawar

NOTICE REGARDING VACATION OF RESIDENTIAL QUARTER.

Reference your letter No. 1216/D-NTFP/Estt: dated 25.01.2023

Kindly refer to the above cited letter, it is requested to pursue the
subject matter till its logical end under intimation to this office, please.

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

Affected

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



SHAMI ROAD PESHAWAR
Ph: +92 91 9212177, Fax: +92 91 9211478
E-mail: ccfforests.pesh@gmail.com

~~6270~~
Ann G

NO. /RA/RK / AA-02

Dated 28 / 03 / 2023

Director
NTFP Directorate
Khyber Pakhtunkhwa Peshawar

FINAL WARNING REGARDING VACATION OF RESIDENTIAL
QUARTER OF MR. DARWESH KHAN EX-SUPERINTENDENT.

Reference this office order No.41 dated 08.11.2023 and office letter No. 2323 dated 18.01.2023

You have already been directed vide this office letter No. 2323, RA/RK/AA-02 dated 13.12.2022, to vacate the category (IV) Residential Quarter of Mr. Darwesh Khan Ex-Superintendent (BPS-17) Retirement order (Copy enclosed) situated at Shami Road complex but to no avail.

You are therefore once again directed to vacate the same by today most positively. In case of failure on your part to accede with the directives issued by this office, concerned Police Station will be in notice to take a legal and necessary action.

Encl: As above.

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

No. 3914 /RA/RK

Copy forwarded to Superintendent Establishment Section Head Office Peshawar for information.

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

Received

by
Zohra
Alwaid

02:18 PM
28/03/2023

28/3

(16)

~~66~~

Ann "H"

To

THE CHIEF CONSERVATOR OF FORESTS
CENTRAL SOUTHERN FOREST REGION - I
PESHAWAR

SUBJECT: RELUCTANT IN VACATION OF CATEGORY IV RESIDENTIAL
QUARTER AT SHAMI ROAD COMPLEX.

It is stated in your esteemed honor that I Aerab Ali am a
photographer here in the office of Conservator of Forest Kohat Circle. Respected sir
I want to draw your kind attention an issue that Mr. Darwesh Khan Ex Superintendent
NTFP(BPS-17) is reluctant to vacate the residential quarter situated at Shami Road
Complex.

Moreover, Director NTFP and Mr. Darwesh Khan has directed time to time via
telephonically and also by official letters a final warning has been issued dated
28/03/2023 but they are reluctant to follow and obey the Orders in true and spirit.
(Office Order, All Notification & Final Warning Copy Enclosed).

It is therefore, requested in your great honor to interpolate the matter to concerned
police station for taking legal action. Please.

Mr. Aerab Ali

Photographer
Conservator of Forests
Kohat Forest Circle

RA
29/3/23
CCFUP

Date 29/03/23

A. H. H. H.

(17)



Office of the
DIRECTOR
Non-Timber Forest Products
Khyber Pakhtunkhwa Peshawar



1579
Annex I

ADDRESS: Khyber Pakhtunkhwa Forest Department Shami Road, Peshawar
Ph: 091-9211480 Fax:091-9213227 E-mail: directorateofntfp@gmail.com
No. D-NTFP / Estt /Khyber-Pakhtunkhwa Dated Peshawar the 10/4/2023
To

Mr. Fazale Amin
Junior Clerk NTFP
Headquarter Peshawar

SUBJECT: **FINAL NOTICE REGARDING VACATION OF RESIDENTIAL QUARTER**

W/memo: Reference to CCF-I verbal Discussion & office Letter
No.3213/RA/RK/AA-02 dated 28/03/2023

You are directed to vacate Category-IV residential quarter situated at Shami Road, Peshawar on or before 4th April,2023 most positively.

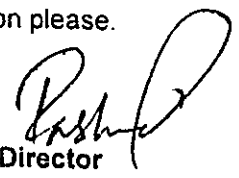
In case of failure on your part to accede with directives issued by CCF-I disciplinary action will be initiated against you under the E&D rules 2011.

Director
Non-Timber Forest Products
Khyber Pakhtunkhwa
Peshawar.

No. 1587 / D-NTFP / Estt Dated Peshawar the 03 / 04 / 2023

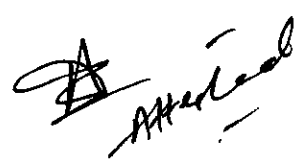
Copy forwarded to the Chief Conservator of Forests, Central Southern Forest Region-I, Khyber Pakhtunkhwa Peshawar for favour of information please.

R.A
CCF-1


Director
Non-Timber Forest Products
Khyber Pakhtunkhwa
Peshawar.

Office of the Chief Conservator of Forests
Diary No. 11093
Dated 3.4.2023
Khyber Pakhtunkhwa Province Peshawar

1476
4/4



(18)

Ann

J

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



SHAMI ROAD PESHAWAR
Ph: +92 91 9212177, Fax: +92 91 9211478
E-mail: ccfforests.pesh@gmail.com

No. 3447 /RA/RK/AA-02

Dated 20 / 04 / 2023

To

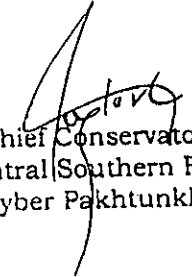
Director
NTFP Directorate
Khyber Pakhtunkhwa
Peshawar

Subject: VACATION OF RESIDENTIAL QUARTER.

Memo: Reference your letter No.1507/D-NTFP/Estt dated 03.04.2023.

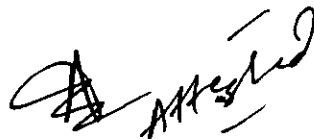
You are requested to pursue the subject matter till its logical ends. Moreover the deadline for the vacation of the subject quarter was 04th April 2023, and several notices were issued in the matter but to no avail.

You are therefore directed that necessary action may be initiated against the concerned occupant under the E&D Rules 2011 and the quarter may be vacated on emergent basis.


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

65

D. RA.RK Record Letter In RA.RK Running Letter-23


Attended

~~Name~~
10/7

Ann "K"



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ENVIRONMENT DEPARTMENT
(GENERAL SECTION)
DATED 17-02-2014

NOTIFICATION

No. SOG(ED)/4-7/2010 Vol-II. The competent authority has been pleased to re-constitute the following House Allotment Committee to run the job smoothly and transparently:

Chief Conservator of Forests (Region-I), Peshawar

(a) For allotment of Residential Quarter / House/Bungalow in the premises of Chief Conservator of Forests-I Office, Shami Road, Peshawar:

- i. CCF-I = Chairman
- ii. Director I&HRD = Member
- iii. SO(G) = Member
- iv. DFO (D) = Member

(b) For allotment of Residential Quarter / House/Bungalow in the premises of FMC Colony:

- i. DS-I = Chairman
- ii. SO(G) = Member
- iii. DFO-I (FMC) = Member

SECRETARY TO GOVERNMENT OF
KHYBER PAKHTUNKHWA
ENVIRONMENT DEPARTMENT

Endst: No & Date as above / 984-29

Copy is forwarded for information and necessary action to:

1. The Chief Conservator of Forests-I, Khyber Pakhtunkhwa, with reference to his letter No.1314/RA/RK dated 12-12-2013.
2. The Director, I&HRD, Peshawar.
3. The Conservator of Forests, Forestry Planning & Monitoring Circle, Peshawar
4. The Divisional Forests Officer (D), Peshawar.

[Signature]
Section Officer (General)

Copy is forwarded for information to:

1. PS to Secretary Environment Department.
2. PA to Deputy Secretary-I, Environment Department.

[Signature]
Section Officer (General)

[Signature]
Attended

Office Order No. 176 Dated Peshawar the 21 /05/2021 issued by 283
A G Khan Chief Conservator of Forests Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar.

As recommended by the Housing Allotment Committee dated 20.05.2021, for allotment of the Category-IV quarter existing in the premises of CCF-I Office Complex, Shami Road Peshawar vacated by Mr. Ajmal Baig Ex-Senior Scale Stenographer on his retirement, the house is further allotted to Mr. Rashid Hussain Assistant Director NTFP, as per his request.

Following terms and conditions shall be applied:-

1. He shall submit occupation of his respective residence.
2. He shall use the premises for residential purposes only.
3. He shall not sublet the premises to any other person.
4. The existing design shall not be altered, otherwise the allotment shall be cancelled and legal action will be initiated against him.
5. He must clear the entire utility bills (Electricity/Gas/Water Charges) regularly on monthly basis.
6. If the premises are required to the Department for any other purpose he will vacate the house on a month notice.
7. He will not go in litigation to the Court against any order of the Department.

Sd-
(A G Khan)
Chief Conservator of Forest
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

No. 3610-17 /RA/RK

Copy forwarded to:-

1. Director Budget and Accounts Government of Khyber Pakhtunkhwa Environment Department Peshawar for information and necessary action.
2. Director I&HRD & Management Peshawar for information.
3. Director NTFP Peshawar for information.
4. Section Officer (General) Government of Khyber Pakhtunkhwa Province Environment Department Peshawar for information.
5. Divisional Forests Officer (Direction) Head Office Peshawar for information and necessary action.
6. Mr. Ajmal Baig Ex-Senior Scale Stenographer, for information and necessary action. He is requested to vacate the bungalow and clear the outstanding dues including House Rent and utility bills.
7. Mr. Rashid Hussain Assistant Director NTFP, for information and necessary action. He is directed to follow terms & conditions of the subject
8. Assistant Forests Engineer Head Office Peshawar for information and necessary action. He is directed to inspect the Bungalow, if there are any outstanding dues exists against the Ex-Steno Grapher, then he be asked to clear the same, under intimation to this office.

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

A. Meded

(21)

Ann M³

To,

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

Through:- Proper Channel.

Subject: **REQUEST FOR ALLOTMENT OF RESIDENTIAL QUARTER.**

R/Sir,

With due deference and profound veneration I beg to state that I am serving in the capacity of photographer in the office of the Conservator of Forests Merged Areas, Peshawar since 2011, and residing in a private rented quarter @Rs.18000/- per month by increasing 20% on yearly basis. Besides of the monthly rent I have also to pay the expenses of conveyance from my home to office on daily basis which is huge financial burden upon me being a deponent of family members in these meager pay.

Your honour is therefore humbly requested to allot me a residential quarter situated at Gul Bahar or Forest Colony at Shami Road, Peshawar and save me from financial and physical torture on humanitarian ground, for which I shall pray for your long life and prosperity please.

Dated: 07-09-2021

Your Most Obedient Servant,




(Mr. Aerab Ali)
Photographer O/O
Conservator of Forests Merged
Areas at Peshawar.

Attended

22

Ann M/I

<p>Farhatullah Khan Conservator of Forests Merged Areas</p>		<p>Newly Merged Areas Sharni Road, Peshawar ☎ 091-9212085 E-mail: cffata45@yahoo.com No. 624 /B&A Dated 8/09/2021</p>
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To

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

Subject: APPLICATION FOR THE REQUEST OF RESIDENTIAL QUARTER

Enclosed kindly find herewith an application preferred by Mr. Aerab Ali Photographer of Merged Areas Circle Office, Peshawar for favour of information and further necessary action in your office, please.

Encl: as above.

Conservator of Forests
Merged Areas
Peshawar.

Attended

50	6049	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈوکیٹ: احسن سردار ایڈوکیٹ		PESHAWAR BAR ASSOCIATION
بار کونسل ایسوسی ایشن نمبر: BC-15-5815		
رابطہ نمبر: 0313/9204759		

بعدالت جناب: سردار نثر بیہونل خیبر پختونخواہ، پشاور

مخاطب: Respondent No. 5	دعویٰ: Service Appeal: 747/23
فضل امین	علت نمبر:
بنام	مورخہ:
حکومت	جرم:
	تھانہ:

بابت تحریر آئکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام پشاور کیلئے احسن سردار / جنید الرحمان ایڈوکیٹس کو وکیل مقرر

کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو

راضی نامہ کرنے و تقرر کاٹھ و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق

زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز

دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کو روکنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی

کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب

مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اپیل کا ساتھ پر داختم منظور و قبول ہوگا

دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا قانونی تاریخ پیشی مقام دورہ یا حد سے

باہر ہو تو وکیل صاحب پابند نہیں ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 04/08/2023

المقام: پشاور

Accepted

نوٹ: اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔

اعراب علی (فوٹوگرام) نارٹ ریپارٹنگ، حکومت خیبر پختونخواہ (Resp: No 5)