

27.09.2016 Counsel for the appellant and Miss. Sahibzadi Yasmeen Ara, A.D(Lgal) alongwith Addl: AG for respondents present. Written reply not submitted. Requested for adjournment. Adjournment granted. To come up for written reply on 16.11.2016.


Member

16.11.2016 Clerk to counsel for the appellant and Mr. Liaqat Ali, Deputy Director alongwith Addl. AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing on 18.01.2017.


Chairman

18.01.2017 Counsel for appellant, Ms. Shaibzadi Yasmeen, AD (legal) and Mr. Muhammad Ibrar, Assistant Secretary alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present. Learned counsel for appellant submitted that departmental appeal of the appellant against adverse entry recorded in the PER of the year 2016 of appellant has been withdrawn by the competent authority and so his grievance have been redressed and he do not want further to pursue the instant appeal. The request is accepted. Signature of learned counsel for appellant is taken on side of order sheet as a token of proof and this appeal stands dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED
18.01.2017


(AHMAD HASSAN)
MEMBER


(ASHFAQUE TAJ)
MEMBER

Muhammad Ibrar
18/1/2017



Government of Khyber Pakhtunkhwa
Home & Tribal Affairs Department.
NO. SO (Pros)/HD/1-32/2012/Vol-I,
Dated Peshawar, the 04th January, 2017.

To

The Director General Prosecution,
Khyber Pakhtunkhwa, Peshawar.

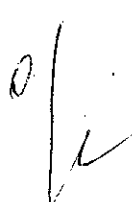
Subject: DEPARTMENTAL APPEAL AGAINST ADVERSE ENTRIES
RECORDED IN THE PER FOR THE YEAR 2014.

Dear Sir,

I am directed to refer to your letter NO. E&A/1(6)/25, dated 01-0-1-2016 on the subject noted above and to say that the competent authority has been pleased to expunge the adverse remarks recorded in the PER of Mr. Jamshed Khan, District Public Prosecutor (BS-19) for the year 2014.

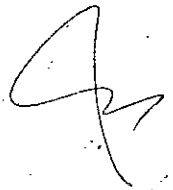
2. The officer concerned may kindly be informed accordingly.

Yours faithfully,


(Jehanzeb Khan)
Section Officer (Prosecution)
Ph:# 091-9210541
Fax:# 091-9210201

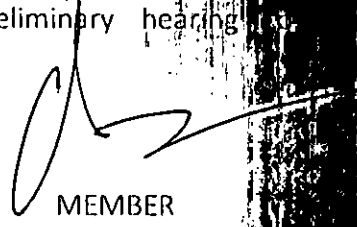
C.c:-

1. The PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary Home & Tribal Affairs Department, Peshawar.
3. PS to Special Secretary Home & Tribal Affairs Department, Peshawar.


4-1-17
3

09.06.2016

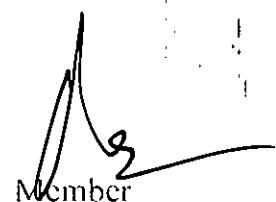
Clerk to counsel for the appellant present. Due to strike of the Bar learned counsel for the appellant is not available today before the Court, therefore, case is adjourned for preliminary hearing on 21.06.2016 before S.B.



MEMBER

11.06.2016

Counsel for the appellant present. Requested for adjournment. Request accepted. To come up for preliminary hearing on 19.7.2016.



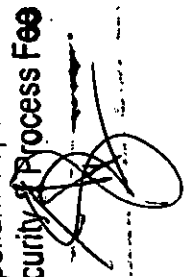
Member

19.07.2016

Appellant with counsel present. Preliminary arguments heard. Counsel for the appellant submitted that adverse entries were made in the ACR's of the remarks were lately communicated to the appellant. He further submitted that the remarks are not true, based on malice and against the factual position. Learned counsel for the appellant also argued that no warning were or counseling was given or prescribed in case of the appellant and the remarks are based on whimsical impels of the authority. The learned counsel for the appellant also argued that the remarks recorded in the different Colum are mutually inconsistent for which reason also the remarks may be expunched. He also submitted that timely departmental appeal of the appellant has not yet been decided and further that the instant appeal is also within time.

The points raised at the bar need further consideration, therefore, admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply. To come up for written reply/comments on 27.09.2016.

Appellant Deposited
Security & Process Fee



Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 448/2016

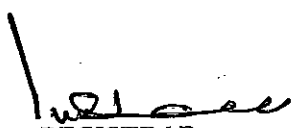
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	26.04.2016	<p>The appeal of Mr. Jamshed Khan resubmitted today by Mr. Kashif Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p>
2	28-4-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>6-5-2016</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
<p style="text-align: center;">6.05.2016</p> <p style="text-align: center;"><i>[Signature]</i></p>		<p>Counsel for the appellant present. Requested for adjournment. Adjourned for preliminary hearing to 9.6.2016 before S.B.</p> <p style="text-align: right;"><i>[Signature]</i> member</p>

Mr. Jamshed Khan son of Khanzada Gul Distt. Public Prosecutor Kohistan received to-
4.2016 is incomplete on the following score which is returned to the counsel for the
completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Affidavit may be got attested by the Oath Commissioner.
- 5- Copy of notice mentioned in para-10 of the memo of appeal is not attached with the appeal which may be placed on it.
- 6- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.
- 7- Appeal may be page marked according to the index.
- 8- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 590 /S.T,

Dt. 13/4 /2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Javed Ali Adv. High Court.

Re submitter after compliance
sentil id
26/4/16

**BEFORE THE HONOURABLE
SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR**

SERVICE APPEAL 448/2016

JAMSHEED KHAN

(Petitioner)

V E R S U S

Government of KPK, through Chief Secretary and others

(Respondents)

I N D E X

S. No.	Documents	Annexure	Page No.
1	Service Appeal		1-5
2	Affidavit		6
3	Copy of impugned ACR	A	7-11
4	Copy of Transfer Order year 2003	B	12
5	Copy of Transfer Order year 2008	C	13-14
6	Copy of Transfer Order year 2013	D	15
7	Copies of official correspondence	E	16-34
8	Copies of Telephone bills & letters	F	35-38
9	Copy of departmental appeal	G	39-42
10	Other relevant documents		43-54
11	Wakalat Nama		55

Petitioner
Jamshed Khan

Through

Javed Ali Mohammadzai
&
Kashif Jan
Advocates, High Court,
Peshawar

Dated: 08.04.2016

0312-9555848

①

**BEFORE THE HONOURABLE
SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR**

SERVICE APPEAL 448 /2016

A.W.F. Province
Service Tribunal
Diary No. 361
Dated 11-4-2016

JAMSHEED KHAN S/O KHANZAD GUL R/O Sardar Ahmad Jan Colony
Peshawar presently posted at District Public Prosecutor, Kohistan.

(Petitioner)

V E R S U S

1. Government of Khyber Pakhtunkhwa, through chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar.
3. Additional Secretary Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar.
4. Director General Prosecution, Khyber Pakhtunkhwa, Peshawar.
5. Director Legal Directorate of Prosecution, Peshawar

(Respondents)

**Appeal u/s 4 services Tribunal act 1974
against the impugned remarks of the
respondent No.02 & 04, wherein both the
respondents reported adverse remarks in the
ACR of the petitioner for the year 2015.**

Filed to the
Registrar
10/4/16

re-submitted to-day
and filed.

Registrar
26/4/16

PRAYER:

On acceptance of this appeal the impugned adverse remarks may kindly be expunged from the ACR of the petitioner for the period 01/01/2014 to 31/12/2014 and also consider the petitioner be fit for further promotion.

Respectfully Sheweth:

That the brief facts of the case are as under:

1. That the Directorate of Prosecution Khyber Pakhtunkhwa, Peshawar severed the petitioner on 01/12/2015 vide notice/letter bearing No.DP/E&A/1(16)1112-16, in connection of adverse remarks in the ACR of the petitioner for the period of 01/01/2014 to 31/12/2014. (Copy attached is **Annexure "A"**).
2. That the petitioner has been indulged in Prosecution Service in the year of 2003 as Additional Public Prosecutor through Public Service Commission at pasted and District Charsadda. (Copy attached is **Annexure "B"**).
3. That in the year of 2008 the petitioner promoted in BPS-18 and transferred from District Charsadda to ATC Swat. (Copy attached is **Annexure "C"**).
4. That in the year of 2013 the petitioner again promoted on acting charge basis in BPS-19 and transferred from District Swat to District Public Prosecutor, Kohistan. (Copy attached is **Annexure "D"**).
5. That the petitioner till date is performing his duty as District Public Prosecutor, Kohistan.

6. That during the above period on different stations there is no complaint is available on service record on the petitioner from bar, bench, police and general public.
7. That the petitioner has already be awarded appreciation letters from the above mentioned three pillar.
8. That the petitioner regularly performed his duty without any hesitation and always remained present on his duty station and never remained absent which is crystal clear from the office correspondence record. (Copy attached is **Annexure "E"**).
9. That the petitioner through his personal efforts installed telephone and FAX facility in the office of District Public Prosecutor, Kohistan, which is stilled in operation and never be disconnected. (Copy attached is **Annexure "F"**).
10. That after receiving the above notice the petitioner filed Departmental appeal to respondent No. 01 through proper channel on 14/12/2015 vide Diary Dispatch No. 10472, against the adverse remarks of the respondent No.02 & 04 with in time, but till date no response on each side has been received. (Copy of dairy receipt is **Annexure "G"**).
and affull
11. That the petitioner being aggrieved from the adverse remarks of the respondent No. 02 & 04 have no other adequate remedy, hence filed this appeal on the following grounds.

GROUND:

- a) That the impugned remarks on the respondent No. 02 & 04 are based on conjectures and presumption, hence liable to be expunged.

- b) That prior to tendering adverse remarks in the ACR of the petitioner, no advance notice, show cause notice has been issued by the respondent No. 02 & 04.
- c) That there was no counseling, similarly no explanation notice or other warnings issued by the respondent No. 2 and 4 in this connection before the adverse remarks mentioned in the impugned ACR which the mandatory requirement of the instruction of the ACR published by the Establishment Department.
- d) That no complaint from any kind is available on the service record of the petitioner, but the respondent No. 02 & 04 were passed unjustified remarks against the petitioner in the ACR for the reason known to them bitterly, therefore, the impugned remarks are liable to be expunged.
- e) That no opportunity for personal hearing had been given to the petitioner by the respondent No. 02 & 04 prior to the impugned adverse remarks which amount to condemn unheard therefore on this very ground the impugned remarks are liable to be expunged.
- f) That the punctually an office command has already been appreciated by the District & Sessions Judge, Kohistan, District Police Officer, Kohistan, Superintendent of Police (Investigation), Kohistan and President of District Bar Kohistan, hence the impugned adverse remarks are liable to be expunged.
- g) That the petitioner prior to the present posting also served in ATC Swat in a very crucial time and the insurgency was on peak but despite this the petitioner performed duty with great zeal without any fear.

- h) That the present appeal within time and other points would be raised at the time of argument.
- i) That the act of the respondent No. 02 & 04 not only against the instruction on ACRs, constitution, relevant law but also against the norms of justice.

It is therefore, humbly prayed that on acceptance of this appeal the impugned remarks may kindly be ordered to expunged and the petitioner may please be considered as fit for further promotion.

Any other relief which is not specially claimed may also be granted in favour of petitioner.


Petitioner

Jamshed Khan

Through


Javed Ali Mohammadzai

&

Kashif Jan 

Advocates, High Court,
Peshawar

Dated: 08.04.2016

**BEFORE THE HONOURABLE
SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR**

SERVICE APPEAL _____/2016

JAMSHEED KHAN

_____ (Petitioner)

V E R S U S

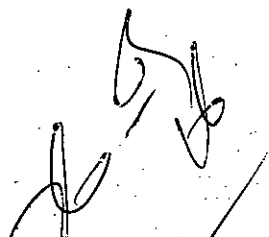
Government of KPK, through Chief Secretary and others

_____ (Respondents)

A F F I D A V I T

I, JAMSHEED KHAN S/O KHANZAD GUL R/O Sardar Ahmad Jan Colony Peshawar presently posted at District Public Prosecutor, Kohistan, do hereby solemnly affirm and declare on Oath that the contents of service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.


DEPONENT


ATTESTED BY
OATH COMMISSIONER
IRFAN ULLAH
Advocate High Court

Amir A

7

CERTIFICATE

Certified that I Jamehad Khan Prosecution
(Name of Officer) (Group/Service) (BS)

have on 01-4-2015 submitted my Performance Evaluation Report
(Date)

to Asmatullah Khan Gondapur Ex-DC(P) KPK
(Name/Designation of Reporting Officer)

My countersigning officer is Syed Abhtas Ali Shah Ex-Secy: Home Dep't
(Name/Designation of Countersigning Officer)

Jamehad Khan

Name/Designation/Department of Officer

D. P. P. Kohistan

Note:- This certificate is required to be dispatched by the officer being reported upon to the Officer Incharge entrusted with the maintenance of his/her C.R. Dossier on the same date the PER is forwarded to his/her reporting officer.

Attested
Kermit D

Guidelines 1

81

GOVERNMENT OF KHYBER PAKHTUNKHWA

حکومت خیبر پختونخواہ

Department/Office

دفتر

Prosecution Directorate
Home Deptt.

Service/Group

سروس گروپ

Prosecution

PERFORMANCE EVALUATION REPORT

کارکردگی رپورٹ

FOR THE PERIOD 1-1-2014 TO 31-12-2014
۱۔۱۔۲۰۱۴ تا ۳۱۔۱۲۔۲۰۱۴

PART I

حصہ اول

(TO BE FILLED IN BY THE OFFICER REPORTED UPON)

(متعلقہ افسر خود پُر کریں)

1. Name (In block letters) JAWSHED KHAN
نام (دائیں حروف میں)
2. Personnel number 00152376
انفرادی نمبر
3. Date of birth 15-08-1965
تاریخ پیدائش
4. Date of entry in service March 2003
لامت اختیار کرنے کی تاریخ
5. Post held during the period (with BPS) DUIPP (P/BS 19)
پیش نظر عہدہ (مع اسکیل)
6. Academic qualifications M.A. L.L. B.
تعلیم
7. Knowledge of languages (Please indicate proficiency in speaking (S), reading (R) and writing (W)) (لے لے (ب)، پڑھنے (پ)، اور لکھنے (ل) کی صلاحیت)
زبانوں کا علم
Pushto, Urdu, English

Attested
[Signature]

Attended
University

I personally conducted protection of various kinds
cases in the Court of Law after from monitoring
of Police investigation agency and prosecutors
working in different Court of law and District
Pakistan -

10. Job description
Attended

(TO BE FILLED IN BY THE OFFICER REPORTED UPON)
(1/1/12)

PART II

9. Period served
(i) In present post *6 June 2012*
(ii) Under the reporting officer *one year*

Name of institution and country	Duration with dates	Name of course attended

8. Nothing received during the evaluation period
[Training courses attended earlier, if any, may please be listed separately on the back page of the report]
(1/1/12)

2. Brief account of achievements during the period supported by statistical data where possible. Targets given and actual performance against such targets should be highlighted. Reasons for shortfall, if any, may also be stated.

بیشتر وقت میں ملازمین کام کا اعداد و شمار کے ساتھ پیش کر کے ہوا ہے۔ اگرچہ ہدف کی تکمیل ہونے کی بجائے ہٹا کر دی گئی ہے۔

The job of undesigned is not target oriented however all the tasks given are Completed well within time and nothing remained outstanding.

PART III

حصہ سوم

(REPORTING OFFICER'S EVALUATION)

(رپورٹنگ آفیسر کا جائزہ)

1. Please comment on the officer's performance on the job as given in Part II (2) with special reference to his knowledge of work, ability to plan, organize and supervise, analytical skills, competence to take decisions and quality and quantity of output. How far was the officer able to achieve the targets? Comment on the officer's contribution, with the help of statistical data, if any, in the overall performance of the organization. Do you agree with what has been stated in Part II (2)?

حصہ دوم (۲) میں بیان کی گئی کارکردگی کا جائزہ پیش کرنے کے لیے عملی اور فکری کرنے کی صلاحیت، مجموعی ہدایت اور نفاذ کرنے کی صلاحیت کے متعلق رائے دی۔ کارکردگی کے معیار و مقدار کے حوالے سے بھی رائے دی۔ ہدف کو پورا کرنے میں آفیسر کی مدد کا کامیاب یا ناکام ہونے کے متعلق ہدایت اور نفاذ کے حوالے سے تبصرہ کیا گیا ہے۔ آپ حصہ دوم (۲) میں دی گئی معلومات سے متفق ہیں؟

He generally remained absent from his duties and left every thing at the mercy of a local SPP. He deliberately got his official telephone disconnected. He did not accomplish the automation work within the given time span. He had been irresponsible from every point of view.

Attested
Kusum / [Signature]

2. Integrity (Morality, uprightness and honesty)

دائرت (مراعاتی و انصافی)

An honest person so far as financial aspect is concerned.

3. Pen picture including the officer's strengths and weaknesses with focus on emotional stability, ability to work under pressure, communication skills and interpersonal effectiveness (Weakness will not be considered as adverse entry unless intended to be treated as adverse).

قلمی خاک: افسر کی خوبیوں اور کمزوریوں کا جائزہ لیں، خصوصاً جذباتی تحمل اور دباؤ کی حالت میں کام کرنے کی صلاحیت، رابطہ اور باہمی اظہار و تفہیم پر کارکن کی صلاحیت بیان کریں (کوئی کو اس وقت تک نئی صورت کیا جائے جب تک رپورٹ افسر ضروری نہ کیے)

No positive/healthy strength of the officer could be demonstrated.
Instead of delivering, he preferred political maneuverings. Nothing worth mentioning of his skills could be noticed.

4. Area and level of professional expertise with suggestions for future posting

پیشہ کاری اور ماہریت کا شعبہ اور سطح کی تجاویز

He should not be posted against any administrative post. He must remain a prosecutor in some Sessions Court & not even posted in the A.T.C.s.

attested
as per

10

5. Training and development needs

مزید تربیت کے لیے تجاویز

Advanced trainings in
Prosecution

6. Overall grading

مجموعی درجہ

Very Good
اعلیٰ

Good
اچھا

Average
اوسط

Below Average
اوسط سے کم

✓
↓

7. Fitness for promotion

ترقی کے لیے مناسبت

Comment on the officer's potential for holding a higher position and additional responsibilities

آفسر کی اعلیٰ عہدے پر کام کرنے اور اضافی ذمہ داریاں سنبھالنے کی صلاحیت کے بارے میں رائے دیں

Not fit for further promotions

Name of the reporting officer ASMATULLAH KHAN

(Capital letters)
رپورٹنگ افسر کا نام (دائیں حروف میں)

Signature
دستخط

Asmat

Designation ex-DG (Prosecution)

عہدہ

Date
تاریخ

07-06-15

Attested
Urdu

PART IV

حصہ چہارم

(REMARKS OF THE COUNTERSIGNING OFFICER)

(کاؤنٹرسائنگ افسر کی رائے)

1. How often have you seen the work of the officer reported upon?

افسر کا کام کس حد تک آپ کی نظر سے گزرتا رہا؟

Very Frequent اکثر و بیشتر	Frequently اکثر	Rarely شاذ و نادر	Never بھی نہیں
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A. H. Shah

2. How well do you know the officer? If you disagree with the assessment of the reporting officer, please give reasons.

آپ افسر کو کس حد تک جانتے ہیں؟ اگر آپ رپورٹنگ افسر کی رائے سے متفق نہیں تو اس کی وجہ بیان کریں

Observed his work quite frequently.

A. H. Shah

3. Overall grading

مجموعی درجہ

Very Good بہلی	Good اچھا	Average اوسط	Below Average اوسط سے کم
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A. H. Shah

4. Recommendation for promotion

ترقی کے لیے سفارش

(Comment on the officer's potential for holding a higher position and additional responsibilities)

(افسر کی اہلیت پر مہمے پر کام کرنے اور اضافی ذمہ داریاں سنبھالنے کی صلاحیت کے بارے میں رائے دیں)

Not fit for promotion.

A. H. Shah

*Attested
Usman D*

111

Evaluation of the quality of assessment made by the reporting officer

رپورنگ افسر کے جائزہ کے معیار کے بارے میں کاؤنٹر سائننگ افسر کی رائے

Exaggerated
مبالغہ آمیز

Fair
مناسب

Biased
جانب دار

AH Shah

Name of the countersigning officer

(Capital letters) SYED AKHTAR ALI SHAH

کاؤنٹر سائننگ افسر کا نام (دائیں حروف میں)

Signature

AH Shah

Designation HOME SECRETARY

ہدف

K.P

Date

تاریخ

PART V

حصہ پنجم

(REMARKS OF THE SECOND COUNTERSIGNING OFFICER (IF ANY))
دوسرے کاؤنٹر سائننگ افسر (شرطاً موجودگی) کی رائے

Name _____ Signature _____
نام _____ دستخط _____

Designation _____ Date _____
ہدف _____ تاریخ _____

Attest
Wahid D

Dated Peshawar the 4.03.2003.

ORDER-

No. E&A(LD)9-2/2003/APP.---Consequent upon the submission of arrival reports and signing of contract agreements by the Additional Government Pleaders/ Additional Public Prosecutors (BPS-17) on 3.4.2003 and 4.4.2003 in pursuance of this Department Notification No. E&A(LD)9-2/APP/AGP, dated 27.3.2003, the following postings/transfers are hereby ordered in the interest of public in relaxation of ban:-

S.NO	NAME	FROM	TO
1.	Mr. Muhammad Ibrahim, APP.	(acting PP ATC, Swat)	(acting PP, Timergara) against the vacant post.
2.	Mr. Said Naccm, APP	APP, Swat	(acting PP ATC, Swat). vice No. 1
3.	Mr. Jehanzeb Khan, APP	APP, Mardan (Takht Bhai)	APP, Kohat.
4.	Mr. Shahzada, APP	APP, Swat	APP, Peshawar.
5.	Mr. Fazli Noorani, AGP/APP	On his first appointment.	AGP/APP, Mansehra.
6.	Mr. Arif Bilal, AGP/APP.	On his first appointment.	AGP/APP, Peshawar.
7.	Mr. Zahid Amin, AGP/APP.	On his first appointment.	AGP/APP, Swat. vice No. 4
8.	Mr. Jamshed Khan, AGP/APP.	On his first appointment.	AGP/APP, Charsadda.
9.	Mr. Shahzad Iqbal, AGP/APP.	On his first appointment.	AGP/APP, Abbottabad.
10.	Mr. Shakeel Asghar, AGP/APP.	On his first appointment.	AGP/APP, Swabi.
11.	Mr. Attaullah Shah, AGP/APP.	On his first appointment.	AGP/APP, Bannu.
12.	Mr. Fahim Khan, AGP/APP.	On his first appointment.	AGP/APP, Upper Dir.

(AMIR GULAB KHAN)
Secretary to Government of the N.-W.F.P.,
Law, Parliamentary Affairs and
Human Rights Department.

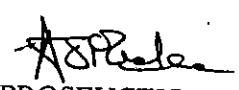
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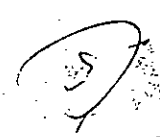
Endst: No. DP-01(11)2002/KC. 24110-2512

Dated: 4.03.2003.

Copy forwarded to:

1. All concerned District and District Judges in N.-W.F.P.
2. The Judge ATC, Swat.
3. The P.S to Minister for Law, Parliamentary Affairs and Human Rights.
4. The P.S to Secretary Law, Parliamentary Affairs and Human Rights Department.
5. The Accountant General, N.-W.F.P.
6. All concerned, Public Prosecutors in N.-W.F.P.
7. All concerned District Accounts Officers.
8. All concerned Officers.
9. The personal file of the officer concerned.
10. The Computer Operator/Accountant, Law Department.


DIRECTOR PROSECUION
LAW DEPARTMENT.


5/11/03

No. _____
Dated Peshawar, the _____ 200

Handwritten notes:
3.1.09.
A.C.

Signature:
Attested
[Signature]

NOTIFICATION.

No.SO(Prosecution)/HD/1-2/2008/Vol-IV. The Provincial Government of NWFP in relaxation of Ban is pleased to Order the following posting/transfer of Public Prosecutors in the public interest with immediate effect: -

S.No	Name	Designation (BPS-18)	From	To	Remarks
1	Syed Feroz Sliah	Public Prosecutor	Peshawar	Peshawar	Against the vacant post of DPP.
2	Shahzada Haliz	Public Prosecutor	Buner	Buner	Against the vacant post of PP.
3	Mohammad Haroon	Public Prosecutor	Faizalpur	Hangu	Against the vacant post of DPP.
4	Nusratullah Jan	Public Prosecutor	Peshawar	Peshawar	Against the vacant post of PP.
5	Mohammad Arif Khattak	Public Prosecutor	Nowshera	Kohat	Against the vacant post of DPP.
6	Abdul Wajid	Public Prosecutor	Tank	Tank	Against the vacant post of DPP.
7	Imtiaz-ud-Din Mansoor	Public Prosecutor	D.I Khan	Bannu	Against the vacant post of PP.
8	Mr.Zulfiqar Ali Khan	Public Prosecutor/SO Regulation-V	Peshawar	Charsadda	Against the vacant post of PP.
9	Sibghatullah	Public Prosecutor	Swabi	Mansehra	Against the vacant post of PP.
10	Saeed Naeem	Public Prosecutor	Swat	Swat	Against the vacant post of PP.
11	Kamran Khan Wazir	Public Prosecutor	Bannu	Bannu	Against the vacant post of PP.
12	Arifullah Shah	Public Prosecutor	Peshawar	Mardan	Against the vacant post of PP AIC.
13	Farmanullah	Public Prosecutor	Kohat	Kohat	Against the vacant post of PP AIC.
14	Mohammad Jehanzeb	Public Prosecutor	D.I Khan	D.I Khan	Against the vacant post of PP AIC.
15	Jehanzeb Khan	Public Prosecutor	Peshawar	Kohistan	Against the vacant post of DPP/PPC No.3
16	Shehzad Iqbal	Public Prosecutor	Abbottabad	Abbottabad	Against the vacant post of PP.
17	Qadir Baksh	Public Prosecutor	D.I Khan	D.I Khan	Against the vacant post of PP.
18	Fazal Noorani	Public Prosecutor	Charsadda	Dir Lower	Against the vacant post of PP.
19	Arif Bilal	Public Prosecutor	Dir Upper	Dir Upper	Against the vacant post of DPP.
20	Attaullah Shah	Public Prosecutor	Lakki Marwat	Lakki Marwat	Against the vacant post of DPP.

GOVERNMENT OF N.W.F.P.
HOME & T.A.S. DEPARTMENT.

14

No.

Dated Peshawar, the ... 2008



21	Fahim Khan	Public Prosecutor	Kohat	Kohat	Against the vacant post of PP
22	Jameshed Khan	Public Prosecutor	Charsadda	Swat	Against the vacant post of PP.ATC
23	Malik Zaheer-ud-Din	Public Prosecutor	Karak	Karak	Against the vacant post of DPP
24	Mian Shahid-ur-Rehman	Public Prosecutor	Nowshera	Abbottabad	Against the vacant post of PP
25	Mohammad Zulfiqar Ali	Public Prosecutor	Peshawar	Haripur	Against the vacant post of PP
26	Mohammad Ayub	Public Prosecutor	D.I Khan	Lakki Marwat	Against the vacant post of PP
27	Saqib Sultan Jadoon	Public Prosecutor	Abbottabad	Abbottabad	Against the vacant post of PP
28	Irshadullah	Public Prosecutor	Nowshera	Nowshera	Against the vacant post of PP.
29	Mohammad Irshad	Public Prosecutor	Mardan	Mardan	Against the vacant post of PP
30	Bashir Mohammad	Public Prosecutor	Batagram	Batagram	Against the vacant post of DPP
31	Mohammad Litaf	Public Prosecutor	Swabi	Swabi	Against the vacant post of PP
32	Mohammad Khalid	Public Prosecutor	Peshawar	Karak	Against the vacant post of PP
33	Salim Mohammad	Public Prosecutor	Directorate of Prosecution	Vice No.34	Director Legal Directorate of Prosecution.
34	Rizwanullah	Director Legal	Director Legal	Provincial Surplus Pool	As per Rules, post of Director Legal can only be occupied by PP.

Secretary to Government of NWFP,
Home & Tribal Affairs Department

Endst:No.SO(Prosecution)/Ht/1-2/08./Vol-IV.

Dated 24/12/2008.

Copy forwarded to :-

- 1)-The Accountant General, NWFP, Peshawar.
- 2)-The Director General, Prosecution, NWFP, Peshawar.
- 3)-All District Public Prosecutors in N.W.F.P.
- 4)-All District Accounts Officer in N.W.F.P.
- 5)-Officers concerned.

Attested
usht

[Signature]
Additional Secretary (Coordination).

Slip No. 2 (1-P)
Date: 03-01-2009

ATTENTION TO AKBARALI KHAN
DDO Kohistan

OFFICE OF THE DISTRICT COMPUTER OF ACCOUNTS SWAT AT SAIDU SHARIF

NO.DCA SWAT/PR-1/ 3593

Dated Saidu Sharif 5/6/13

To.

The District Accounts Officer

Kohistan

A-D (15)

Subject:- TRANSFER OF SERVICE DOCUMENTS/L.P.C.IN R/O

Transfer of Khan pp

Memo:-

Consequent upon the Promotion/Transfer of the above named Officer to the audit jurisdiction of your office, his service documents VIZ L.P.C. Service statement And Personal File are sent herewith. He has been paid up to 31/5/13 payment. (After Noon) in the following rates.

Payment.	
Basic Pay.	32600-
P.P.	
HRA	5904-
C.A.	5000-
SPR Allow	10000-
ST Incentive	20000-
CH/UA	2000-
D.A. NR-11	2634-
M.A.	2634-
AR 30%	8780-
STA NR 11	6520-
Ch: All BTA	500-
AA-10-50%	
Conv: All	//
AA-11-15%	
G. Total	96572-

Deduction	
GPF	3760-
GPF Advance	
B/Fund	250-
Add: G. Ins:	44-
G. Ins:	403-
HBA ST	3971-
M/ Cycle	
Total Deduction	

1. He made over the charge on (A.N.) 28/5/13
 2. Recovery of over payment: 2015 to 31/5/13 @ Rs 96572/-
 3. Other Recovery: TTD Rs 6000/- he Corzable

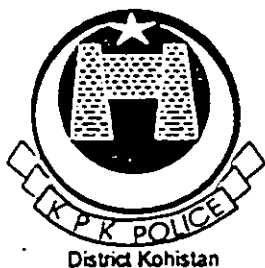
Service Statement.

Post	Period	Pay	PP	HRA	SAA	STA	C.A	SBA	ARA	D.A	Chai	AR	MA	AA	Con AA	AA	Total
											All	09		-10	All	-11	

Attested
[Signature]

Phone 0998 407023

Fax 0998407139



OFFICE OF THE HEAD OF INVESTIGATION,

KOHISTAN

No: 534-51 /PA/Invest, dated 09 / 05 / 2014.

MINUTES OF THE MEETING HELD ON 07/05/2014 BETWEEN PROSECUTION
& INVESTIGATION WING KOHISTAN.

A meeting was held in the office of Superintendent Police investigation Kohistan today Dated: 07/05/2014 at 11:00 am, participated by CIOs/OIs of District Kohistan and District Public Prosecutor Kohistan.

The meeting was commenced with the holy word of Qurani PAK. During the discussion different issue were raised regarding the investigation by the participants. The main issue of the discussion was impartial and fair investigation in order to save the skin of the innocent persons for the agony of law while Punish the actual culprits. Circular order bearing No: 3494-3517 Dated: 05/05/2014 was under discussion thoroughly. The main focus of the discussion was the used of modern tools in investigation and collecting call data record of accused in each crime.

The S.P investigation directed to the participant for early dispatches of recovered article to FSL for analysis through coddle and legal way. The participants ensure the learned S.P investigation that they would be complied with the direction. The S.P investigation also directed to the CIOs/OIs to be honored the mandatory provision of section 173 Cr Pc and further directed to use the investigation kit during the investigation at the scene of occurrence including photography. The SP investigation also explained the various aspects of the investigation including DNA and finger prints e.t.c.

The District Public prosecutor informed CIOs/OIs that the investigation on one hand is legal way for establishing the crime and on the other hand it is an art. The faire impartial investigation is the basic demand of Justice.

The District public Prosecutor further informed the investigation staff that the services of Prosecutors in District Kohistan would be available to them around the clock if needed. It is further stated that the investigation and prosecution is depend upon each other if the investigation is strong, then prosecution would be strong. It is further stated that Devotion to the profession is the necessity of law, time and honesty as well."

A - a - E

16

Attested
[Signature]

17

The participants, ensured that they should be utilized the legal and modern tools in future for faire and impartial investigation and should be devoted to their profession.

The meeting ended with the vote of Thanks.

M. Siddique

(MOHAMMAD SIDDIQUE)

Head of investigation

Kohistan.

No: 534-51 PA/invest/KH Dated: 9/5/2014.

Copies to:

1. Additional Inspector General of Police Investigation KP Peshawar.
2. Deputy Inspector General of Police Investigation IV KP Peshawar.
3. District Public Prosecutor Kohistan.
4. District Police officer Upper Kohistan.
5. District Police officer Lower Kohistan.
6. All CIOs/OIIs District Kohistan.

M. Siddique

(MOHAMMAD SIDDIQUE)

Head of investigation

Kohistan.

Attested
M. Siddique

MINUTES OF THE MEETING OF CRIMINAL JUSTICE COORDINATION
COMMITTEE DISTRICT KOHISTAN HELD ON 19-12-2014 AT 10:00 AM

A Meeting of Criminal Justice Coordination Committee was held on 19-12-2014 at 10:00 AM presided over by honorable District & Session Judge, Kohistan. The Following attended the meeting.

- | | | |
|----|----------------------------------------------------------------------|------------|
| 1. | Mr. Sardar Muhammad Irshad,
District & Session Judge, Kohistan | Chairman |
| 2. | Mr. Ali Rehmat Khan,
District Police Officer, Upper Kohistan | Member-I |
| 3. | Dr. Noshervan,
Representative of Health Department Kohistan | Member-II |
| 4. | Mr. Gul Alam,
Superintendent Sub Jail Dassu Kohistan | Member-III |
| 5. | Mr. Jamshaid Khan ,
District Public Prosecutor, Kohistan | Member-IV |
| 6. | Mr. Amjad Khan
Deputy Superintendent of Police,
Lower Kohistan | Member-V |
| 7. | Mr. Muhammad Siddique,
Head of investigation, Kohistan | Secretary |

The meeting started with the recitation from the Holy Quran. The Chair welcomed the participants: where after following issues have been discussed.

1. POLICE

Chair asked about the implementation of previous directions for ensuring the attendance of PWs . DPO upper Kohistan informed the chair that a special police officials have been deployed as (PSC)/Pervi Muqaddmat Cell under direct control of DPP whose main responsibility is to serve the summons and execute the warrants well in time.

2. HEALTH

Representative of Health department informed the chair that purchasing of the medicine for the prisoners are underway. The same will be handed over to superintendent jail very soon.

3. SUB -JAIL DASSU

Superintendent Jail requested the Chair that no transport facility has been provided to the Jail to meet any emergency. It has been decided that DPO upper Kohistan will issue instruction to SHO PS Jalkot for the provision of police mobile in case of emergency on temporary basis and jail superintendent was directed to make correspondence with his high-ups for the provision of ambulance to the Sub-Jail Jalkot. Simultaneously minutes of the meeting may also be sent to Home Secretary so that he could take up the matter with Provincial Government, for provision of one ambulance service to Sub Jail Dassu at Kohistan.

Attested
[Signature]

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

Prepared by

M. Sadiq
(MUHAMMAD SADDIQUE)

Head of Investigation,

Kohistan

Approved by

(SARDAR MUHAMMAD IRSHAD)

District & Session Judge,

Kohistan

No 1486-99 /D&SJ dated Kohistan the 22/12/2014.

Copy of above is submitted for information and necessary action to:-

1. The Honorable Registrar, Peshawar High Court, Peshawar.
2. The Secretary Home, Govt: of Khyber Pakhtunkhwa Peshawar
3. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
4. The Inspector General of Prisoners, Khyber Pakhtunkhwa, Peshawar.
5. The Addl: IGP, Investigation, Khyber Pakhtunkhwa Peshawar
6. The Regional Police Officer, Hazara Region Abbottabad.
7. The Director General Health, Khyber Pakhtunkhwa.
8. The Senior Civil Judge, Kohistan at Dassu.
9. The Deputy Commissioners. Upper & Lower Kohistan.
10. The District Police Officers, Upper & Lower Kohistan.
11. The District Health Officer, Kohistan.
12. The Superintendent of Sub Jail, Jalkot Kohistan.
13. The District Public Prosecutor, Kohistan.
14. The Head of Investigation, Kohistan

(SARDAR MUHAMMAD IRSHAD)

District & Session Judge,

Kohistan.

Attested
M. Sadiq

ایک بینک زیر سرپرستی صا - DPP کو حتمیٰ مقام ڈسٹرکٹ بینک ڈرامیلوٹر


خروج 27 جون 2014 کو منعقد ہوئی

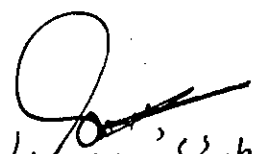
جس میں مندرجہ ذیل افراد نے شرکت کی


- 1 - App کو حتمیٰ
- 2 - SP انومی گیشن کو حتمیٰ
- 3 - سی۔ آئی۔ او کو حتمیٰ
- 4 - انومی گیشن آفیر داسو
- 5 - انومی گیشن آفیر محمد

بینک کا آغاز قرآن پاک کی تلاوت سے کیا گیا اور بعد از تلاوت صا DPP صاحب نے طالبان کو بروقت داخل / جمع کرنے کیلئے پر زور ناکسیری اور بنایا کہ وہ تقریبات جن میں چودہ دن سے اندر طالبان مکمل جمع ہیں کیا جا سکتا۔ ان میں عبوری طالبان تیار کرنے کا مکمل قانونی طریقہ بھی سمجھایا گیا۔

جس پر محمد اراکین بینک متفق ہوئی۔
 آخر میں صا - DPP صاحب اور صا - SP انومی گیشن نے جمع اراکین کا شدہ ادا کیا اور آئندہ کیلئے ایک دوسرے کے ساتھ مکمل تعاون کرنے کا ماور فرمایا۔


 ایس بی انومی گیشن
 کو حتمیٰ


 ڈسٹرکٹ بینک ڈرامیلوٹر
 کو حتمیٰ

Attested


ایک ٹینک زیر شہر برستی ضاب۔ ڈی بی بی ماہی کوھتال بمقام ڈسٹرکٹ سٹاک براسٹیو


(21)

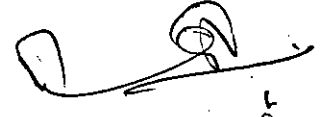
درجہ 29 دئی 2014 کو منظور ہوئی

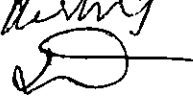
جس میں صدر جم ذیل افسران نے شرکت کی

- 1- App کوھتال
- 2- ایس بی الوسی گیشن کوھتال
- 3- سی آئی او کوھتال
- 4- الوسی گیشن آفسیرواسو
- 5- الوسی گیشن آفسیر قلم

ٹینک کا آغاز قرآن پاک کی تلاوت سے کیا گیا اور کبہ از تدرت مال نقرات کے بارے میں ضاب۔ DPP صاحب الوسی گیشن سے دستکس ہوئی۔ اور اعلیٰ بنا یا گیا۔ افسران کو بتایا جائے کہ جمعہ نقرات میں مال لقمہ کو باقاعدہ بند پارسل ستر ظہر کیا جائے کیونکہ مال نقرات بند پارسل نہ ہونے کی وجہ سے حملزمان کو فائدہ ہوتا ہے جس پر جمعہ اراکین ٹینک متفق ہوئی۔ اور DPP صاحب کوھتال نے DPP صاحب الوسی گیشن کو براسٹیویشن کی طرف سے عمل قانونی تعاون کا یقین دلایا۔ آفر میں ضاب۔ DPP صاحب اور DPP الوسی گیشن نے جمعہ اراکین کا شکریہ ادا کیا اور آئندہ کیلئے ایسے دوسرے کے ساتھ عمل تعاون کرنے کا مادہ کرانا کیا۔


ڈسٹرکٹ سٹاک براسٹیو
کوھتال


ڈی بی بی الوسی گیشن
کوھتال

Attentive
Nishad


لوٹس نم ایس۔ ایچ۔ او ٹھانہ میلہ

22

ڈائری بن 06

دورہ 15-1-2015

لوٹس نم کے ذریعے ایجوو واپس لیا جاتا ہے۔ کہ ٹھانہ میلہ باٹا مدنی
سے FIR کے تاجی زبیر دیکھی کے دفتر ارسال نہیں کرتے۔ سال 2014
کے FIR کے تاجی زبیر سے معلوم ہوا کہ عا سے بیکر ع 134 تک FIR
سال 2014 کے تاجی زبیر دیکھی کے دفتر ارسال نہیں کئے گئے ہیں جس
On Line delete میں غلطی ہیں۔ لہذا ایکویٹی
جاتی ہے کہ FIR عا سے بیکر ع 134 سال 2014 کے
بغیر کسی تاخیر کے جلد از جلد ارسال کریں۔ تاہم 2014 کا FIR
Data چیک کر جائیں اور اسے ڈیٹا بیکر ڈسٹریکٹ ڈیپارٹمنٹ

المستقیم 15/01/15

District Public
Prosecutor
Kohistan

محمد طان
ڈسٹرکٹ پبلک پروسیکیوٹر
کوئٹہ

Attested
Munir D

23

Phone 0998 407023

Fax 0998407139



OFFICE OF THE DISTRICT POLICE OFFICER

UPPER KOHISTAN

No: 283 /PA, dated 28/10/2014.

Mints of the meeting

A meeting was held in Kohistan Police Line Komila, on 22-10-14. The meeting was presiding by District Police Officer Kohistan Mr. Ali Rehmat Khan at 12; 30 PM. The meeting was participated by DFC's Maharar HC's and S.H.O.s Police Stations of Upper Kohistan.

The meeting was in the shape of workshop had tow session in the first session the District Public Prosecutor Kohistan Mr. Jamshaid Khan has given a detail lecture on the mode of service of summons and warrants. The District Public Prosecutor added that the mode of service of summon is available in criminal procedure code chapter VI section 68/69/70/71 read with the article 88 of qanunishadat. Other related issues were also remained under discussion and point out the always objected by the court.

In the second session the SP Investigation Mr. Mohammad Siddique was discus the various aspect of investigation and explains the different stages of a criminal case. The SP Investigation in this connection is given the reference of different relevant law books. All the participants appreciated the arrangement of above meeting discussions in future. All such officers shall strictly order to testify in the cases when the court plans to summon. In each case to ensure the maintenance of a martyr figure. Officers appointed in other district informed by telephone, special roof and wireless messaging, must be notified by fax that invoking judicial Articles Main motions are not.

In the last the District Police Officer convey his comprehensive message to the participants and promised to him such like meeting on monthly bases, and the meeting was ended on the votes of thanks by and from District Police Officer.

(Signature)
(ALI REHMAT KHAN)

92 District Police Officer
Upper Kohistan.

No: 893-97 PA/ Dated: 24/10/2014.

Copies to:

1. The Regional Police Officer, Hazara Region, Abbottabad.
2. The District & Session Judge Upper Kohistan.
3. The District Public Prosecutor Kohistan.
4. The Senior Civil Judge Upper Kohistan.
5. The Head of Investigation Kohistan.

Attest
(Signature)

(Signature)
(ALI REHMAT KHAN)

92 District Police Officer
Upper Kohistan.

تفام 9.0.0 کو مطلع کیا جاتا ہے کہ نقشبت علیا کے والد جب
 قتل مقدمہ برائے ادخل عدالت بھیجا جاتا ہے تو اس نام A
 بحکم اس چھٹی کے ساتھ لفت ہے۔ فولو کاپی کر کے قتل پولیس پر لگایا
 کریں نام قتل مقدمہ کے علمہ و مقامات بعبہ شہادت بوقت ملاوہم
 قتل مقدمہ درج کریں۔ 9.0.0 وہاں صرف FIR پر تاریخ
 وقوعہ نمائندہ دفعات اور ملزمان کے تعداد تکمیل یا قی
 مدد رجحانات پر ریکورڈیشن دفتر میں دیکھا جائے گا۔ یہ
 از حد ضروری ہے۔ نام A "مذکورہ" کیس کی نسبت لایا
 ارسال کیا جائے گا۔ عدالت پر عمل دیکھا قانون، اعلیٰ درجہ
 نقشبت ہے۔

ڈسٹرکٹ پبلک پراسیکیوٹر
 گیسٹ ہاؤس ڈپٹی ڈپٹی
 15/11/15

District Public
 Prosecutor
 Kohistan

Attest
 [Signature]

(25)

MINUTES OF THE MEETING OF CRIMINAL JUSTICE COORDINATION COMMITTEE
DISTRICT KOHISTAN HELD ON 21-10-2014 AT 11:00 AM

A Meeting of Criminal Justice Coordination Committee was held on 21-10-2014 at 11:00 AM presided over by honorable District & Session Judge, Kohistan. The Following attended the meeting.

- | | | |
|----|-----------------------------------------------------------------------|------------|
| 1. | Mr. Sardar Muhammad Irshad,
District & Session Judge, Kohistan | Chairman |
| 2. | Mr. Syed Kamal Hussain Shah,
Senior Civil Judge, Kohistan at Dassu | Member-I |
| 3. | Mr. Ali Rehmat Khan,
District Police Officer, Upper Kohistan | Member-II |
| 5. | Mr. Muhammad Arshad Khan,
District Police Officer, Lower Kohistan | Member-III |
| 6. | Dr. Taj Mohammad,
Representative of Health Department Kohistan | Member-IV |
| 7. | Mr. Mahi-ud-Din Shah,
Superintendent Sub Jail Dassu Kohistan | Member-V |
| 8. | Mr. Jamshaid Khan,
District Public Prosecutor, Kohistan | Member-VI |
| 9. | Mr. Muhammad Siddique,
Head of investigation, Kohistan | Secretary |

The meeting started with the recitation from the Holy Quran. The Chair welcomed the participants: where after following issues have been discussed.

- POLICE

PWs have not been attending the courts as summons are not being served upon them properly by the DFCs. Both the DPOs ensured that compliance of the court orders would be made in future. DPP suggested that workshop may kindly be arranged for DFCs and other police officials in Kohistan to keep them aware about the procedure which was unanimously accepted.
- HEALTH

DHO was directed to ensure the availability of medical officer in RHCs upper and lower Districts and further directed to prepare the medico legal reports finding with out accepting any political pressure.

Attested

(Signature)

CAMP COURT AT PATTAN

Both DPOs requested for establishment of a camp court of Sessions at Pattan which would facilitate the litigants their PWs and police. The Chair replied that he would take up the matter with Honorable Peshawar High Court.

The chair directed the Head of Investigation, Kohistan to arrange transfer proceeding of the confiscated cars to Peshawar for the purpose of auction. Both the DPOs ensured the Chair for doing the needful according to law.

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

Prepared by

Approved by

Hindya

(MUHAMMAD SADDIQUE)
Head of Investigation,
Kohistan

[Signature]

(SARDAR MUHAMMAD IRSHAD)
District & Session Judge,
Kohistan

No 1136-49 /D&SJ dated Kohistan the 27 / 10 /2014.

Copy of above is submitted for information and necessary action to:-

1. The Honorable Registrar, Peshawar High Court, Peshawar.
2. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
3. The Inspector General of Prisoners, Khyber Pakhtunkhwa, Peshawar.
4. The Addl: IGP, Investigation, Khyber Pakhtunkhwa Peshawar
5. The Regional Police Officer, Hazara Region Abbottabad.
6. The Director General Health, Khyber Pakhtunkhwa.
7. The Senior Civil Judge, Kohistan at Dassu.
8. The Deputy Commissioners, Upper & Lower Kohistan.
9. The District Police Officers, Upper & Lower Kohistan.
10. The District Health Officer, Kohistan.
11. The Superintendent of Sub Jail, Jalkot Kohistan.
12. ✓ The District Public Prosecutor, Kohistan.
13. The Head of Investigation, Kohistan

[Signature]

(SARDAR MUHAMMAD IRSHAD)
District & Session Judge,
Kohistan

Attest
[Signature]

ایک مینٹ زیر سرپرستی صاب - DPP صاب کو ہسپتال مقام دفتر SP الوسی کشن کو
فورم 25 ستمبر 2014

جس میں مندرجہ ذیل افراد نے شرکت کی

- 1 - DPP کو ہسپتال
- 2 - ایس بی الوسی کشن
- 3 - سی آئی او کو ہسپتال
- 4 - الوسی کشن آفیسر ڈا سو
- 5 - الوسی کشن آفیسر کبیر

مینٹ کا آغاز قرآن پاک کی تلاوت سے کیا گیا اور بعد از تلاوت
صاب DPP صاب نے صاب - SP الوسی کشن سے والدین کے
کالموں کو ترتیب سے مکمل کرنے کے بارے میں سمجھایا کہ حاصل طور پر
والدین مکمل کے کامل نمبر 5 (مال مقدمہ) میں کیسوں اندراج کیا جائے
کیونکہ کسی افراد تیم والدین میں مذکورہ کالم میں صرف یہ درج کرتے
ہیں کہ مال مقدمہ سالو کے مطابق جو اذ روئے قانون نہ ہے

جس پر جدار کشن مینٹ متفق ہوئی اور صاب DPP صاب نے
طرف سے مکمل قانونی تعاون کا یقین دلایا۔
آخر میں صاب - DPP صاب اور صاب - SP الوسی کشن نے
جدار کشن کا شکر یہ ادا کیا اور آئندہ کیلئے ایک
دوسرے کے ساتھ مکمل تعاون کرنے کا باور ڈالا گیا

ایس بی الوسی کشن
کو ہسپتال

ڈسٹرکٹ سیکرٹری
کو ہسپتال

Attested

ایک مٹکے زیر سرپرستی صاحب DPP کو حیدرآباد مقام ڈسٹرکٹ سٹاک بروکریز
ورم 4 جولائی 2014 کو منفقہ ہوئی
ص میں صدر جدول افران نے شرکت کی

- 1 - DPP کو حیدرآباد
- 2 - SP انومی گیشن کو حیدرآباد
- 3 - سی آئی او کو حیدرآباد
- 4 - انومی گیشن افسر داسو
- 5 - انومی گیشن افسر کید

مٹکے کا آغاز قرآن پان کی تداوت سے کیا گیا اور بعد از تداوت سے
صاحب DPP سے کو ایمان کی عدم موجودگی پر یوں ہی اور صاحب
SP صاحب انومی گیشن سے کو ایمان کی طغری کو یقین بنانے کیلئے ہر عمل
کو پیش کرنے کیلئے پر زور تاکیدی
جن پر حیدرآباد میں مٹکے متفق ہوئی
آخر میں صاحب DPP صاحب اور SP صاحب انومی گیشن نے بعد
اراکین کا شکر یہ ادا کیا اور آئندہ کیلئے ایسے دروس
ساتھ مکمل تعاون کرنے کا باور ڈرایا گیا

اسٹیشن لی انومی گیشن
کو حیدرآباد

ڈسٹرکٹ سٹاک بروکریز
کو حیدرآباد

Attested
Kamil D

ایک سینک زیر شہریتی صا - DPP کو صحتیان مقام ڈسٹرکٹ ٹریڈنگ برائیلوٹر

خروج 2 آگست 2014 کو منعقد ہوئی -

جس میں مندرجہ ذیل افراد نے شرکت کی -

- 1 - DPP کو صحتیان
- 2 - SP الومنی گیشن کو صحتیان
- 3 - سی آئی او کو صحتیان
- 4 - الومنی گیشن آفسیڈر اسنو
- 5 - الومنی گیشن آفسیڈر کیم

ٹینڈر کے آغاز قرآن پاک کی تلاوت سے کیا گیا اور بعد از تلاوت صا - DPP صا نے منشیات اور دیگر خدمات جن میں مال بھرم وغیرہ کیلئے FSL کے ساتھ ملتا ہے ان خدمات میں ایل کاران کی آمد، روٹیں، رسدات لگاتار کی نامیدی کیونکہ ان کی عدم موجودگی میں ملزمان کو تائیرہ پھٹتا ہے جس پر جہاں رائسین ٹینڈر متفق ہوئی آفر میں صا - DPP اور صا - SP الومنی گیشن نے جہاں رائسین کا شکریہ ادا کیا اور آمیزہ کیلئے ایک دوسرے کے ماقو لیاؤن کرنے کا ماور کر لیا گیا

ایشی الومنی گیشن
کو صحتیان

ڈسٹرکٹ ٹریڈنگ برائیلوٹر
کو صحتیان

Attestul
Usmit D

ایک منیٹ زیر سرپرستی جا۔ DPP کو ہتھ پاں بمقام دفتر SP الومنی گٹن کو ہتھ پاں

نوم 31 دسمبر 2014 کو منعقد ہوئی

جس میں مندرجہ ذیل ارکان نے شرکت کی

- 1- DPP کو ہتھ پاں
- 2- SP الومنی گٹن کو ہتھ پاں
- 3- سی۔ آئی۔ او کو ہتھ پاں
- 4- الومنی گٹن آف داسو
- 5- الومنی گٹن آف سیکر

منیٹ کا آغاز قرآن پاک کی تلاوت سے کیا گیا منیٹ میں حاضرین کے اہم نکتے پر تفصیلی بحث سے متعلق ہوا اور DPP کو ہتھ پاں نے SP الومنی گٹن کو ہدایت کی کہ جم الومنی گٹن سٹاف اور ایڈیشن سٹاف کو اعلیٰ ترین عہدہ پر ترقی دینا 173 افراد کی عملہ پاسداری کے حاملین، نگرانہ خدمت میں برائے احوال عدالت، پیش کریں کہورت دیکر عبوری حاملین زیر تفتیش تقریبات میں عدالت میں جمع کر اسیں۔ تاکہ عبوری تاحضرت ج میں۔

اس پر صبا۔ SP صاحب الومنی گٹن نے ارکان منیٹ کو لکھتے ہوئے کہ دیکر پانچ آئندہ کیلئے ہم درجہ تا کو ہدایت کی جائیگی کہ مندرجہ بالا ہدایت پر عمل درآئیں۔ منیٹ میں گواہان کی حاضری پر ارکان منیٹ سے مبرا اطمینان کا اظہار کیا اور اس طرح SP الومنی گٹن اور DPP کو ہتھ پاں نے جم ارکان کا شکریہ ادا کیا اور ایک دوسرے کے ماقول مسائل وغیرہ مشورہ کرنے کی گفتگو دیکر ما۔

(Handwritten signature)

اسٹیجی الومنی گٹن
کو ہتھ پاں

(Handwritten signature)
ڈیپٹی سیکرٹری
کو ہتھ پاں

Attested
(Handwritten signature)

ایک ٹیکٹ مابین ریاستیوں اور اومی گیشن ٹھکانوں کے مابین
 ورخ۔ 24 اکتوبر 2014 کو منقر ہوئی جس میں مندرجہ ذیل اراکین نے شرکت کی

1- SP اومی گیشن ضلع ٹھکانا

2- وزیر ٹھکانا

3- اومی گیشن آفسر خانہ بہرین

4- اومی گیشن آفسر خانہ مائورٹ

5- DPP ٹھکانا منقر ہوئی اور آغاز ٹیکٹ تداوت قرآن

ٹیکٹ زیر صدارت جی۔ DPP ٹھکانا نے SP اومی گیشن ٹھکانا کو بتایا کہ ہم
 ایک سے کیا گیا۔ DPP ٹھکانا نے SP اومی گیشن ٹھکانا کو بتایا کہ ہم
 اومی گیشن ٹھکانا کے ذریعے اومی گیشن مستقبل میں
 کروائیں اور یہ جی ہدایت ہے کہ جدید اومی گیشن کسٹمر کے ذریعے آلات حاصل کرنے
 سے خاطر صدر راجہ راجہ DPP نے SP اومی گیشن کو ری اسٹیبلشمنٹ کے ضرورت
 میں کرتے ہوئے جی ری اسٹیبلشمنٹ ٹیکٹ ضلع ٹھکانا کا ورک سٹاپ بلڈ نے
 کی تجویز دی جس پر SP اومی گیشن، دفتر اراکین ٹیکٹ متفق ہوئے،
 اور SP اومی گیشن نے باور کروایا کہ DPP ٹھکانا سے اس نسبت رابطہ
 کر کے اس کے علاوہ دفتر اور جی اومی گیشن سے تعلق رکھتے جی ری اسٹیبلشمنٹ
 آئے۔ بعد ازاں DPP ٹھکانا نے جی اراکین کا شکریہ ادا کیا اور ایک
 دوسرے کے ساتھ نیکل انکاون اور رابطہ رکھنے کی لہجہ دہانی کرائی۔

M. H. H.

ایس جی اومی گیشن
 ٹھکانا

○

ڈسٹرکٹ سٹیٹ ری اسٹیبلشمنٹ
 ٹھکانا

Attested
 Verat D

**MINUTES OF THE MEETING OF CRIMINAL JUSTICE COORDINATION
COMMITTEE DISTRICT KOHISTAN HELD ON 08-05-2015 AT 10:00 PM.**

A Meeting of Criminal Justice Coordination Committee was held on 08-05-2015 AT 10:00 PM presided over by honorable District & Session Judge, Kohistan. The Following attended the meeting.

- | | | |
|----|--------------------------------------------------------------------------|-------------------|
| 1. | Mr. Sardar Muhammad Irshad,
District & Session Judge, Kohistan | Chairman |
| 2. | Mr. Muhammad Siddique,
Head of investigation, Kohistan | Secretary |
| 3. | Mr. Jamshed Khan
District Public Proscuter | Member-I |
| 4. | Mr. Gul Alam,
Superintendent Sub Jail Dassu Kohistan | Member-II |
| 5. | Mr. Safdar Khan,
DSP Head Quarter, Dassu Upper Kohistan | Member-III |
| 6. | Mr. Amjad Khan
Deputy Superintendent of Police, Lower Kohistan | Member-IV |
| 7. | Dr. Noshewan,
Representative of Health Department Kohistan | Member-V |

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants: where after following issues have been discussed.

1. **POLICE**

The chair showed concern over registration of increased number of cases U/S 5/6 of CNSA 1997 without any proof of cultivation of cannabis plants by the accused involved therein. The chair asked the Police to associate Patwari halqa or to record statements U/S 161 CrPc of the owners of adjoining properties or to at least arrest the accused from the spot and to avoid registration of false cases. The chair further directed to take legal action against those who register false cases against innocent citizen. It was further directed to initiate proceedings against those Police officers/officials who in actual cases give concessional statements in favour of accused out of some ulterior motive.

2. **HEALTH**

Representative of Health department Dr. Noshewan informed the chair that requisite medicines have been provided to superintendent jail and at present all necessary medicines are available in the jail.

3. **SUB -JAIL DASSU (JALKOT)**

Superintendent Sub Jail Dassu (Jalkot) informed the Chair that the Doctors are not coming to Jail for the treatment of ill prisoners.

The representative of health department informed the chair that they are facing shortage of doctors, however one doctor will be deputed on regular visit to the sub jail jalkot.

Mohd
(محمد سید ابوالحسن)
27/05/2015

Attested
Kashif

33

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

Prepared by

M. Siddique

(MUHAMMAD SIDDIQUE)
Head of Investigation,
Kohistan

Approved by

(Signature)

(SARDAR MUHAMMAD IRSHAD)
District & Session Judge,
Kohistan

No 544-SS/D&SJ dated Kohistan the 19/05 2015.

Copy of above is submitted for information and necessary action to:-

1. The Honorable Registrar, Peshawar High Court, Peshawar.
2. The Secretary Home, Govt: of Khyber Pakhtunkhwa Peshawar
3. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
4. The Inspector General of Prisoners, Khyber Pakhtunkhwa, Peshawar.
5. The Addl: IGP, Investigation, Khyber Pakhtunkhwa Peshawar
6. The Regional Police Officer, Hazara Region Abbottabad.
7. The Director General Health, Khyber Pakhtunkhwa.
8. The Senior Civil Judge, Kohistan at Dasso.
9. The Deputy Commissioners, Upper & Lower Kohistan.
10. The District Police Officers, Upper & Lower Kohistan.
11. The District Health Officer, Kohistan.
12. The Superintendent of Sub Jail, Jalkot Kohistan.
13. The District Public Prosecutor, Kohistan.
14. The Head of Investigation, Kohistan

(SARDAR MUHAMMAD IRSHAD)
District & Session Judge,
Kohistan

Attested
(Signature)

مورخہ 01-04-2015 بوقت 10:00 کے

- | | |
|-------------------------------------------------|-----------------------------------|
| میٹنگ میں ذیل پولیس افران نے شرکت کی۔ | |
| 1. محمد صدیق ہیڈ آف انوسی گیشن ضلع کوہستان | 10. SI محمد جاوید OI تھانہ سارین |
| 2. جمشید خان ڈسٹرکٹ پبلک پراسیکیوٹر ضلع کوہستان | 11. SI احمد خان OI تھانہ ہربن |
| 3. انسپکٹر محمد اظاف انوسی گیشن ڈیگیشن | 12. SI نسیم خان OI تھانہ پالس |
| 4. SI ریاست خان OI تھانہ کمبلہ | 13. ASI محمد ایاز OI تھانہ ہربن |
| 5. SI عبدالرحمان خان OI تھانہ کرنگ | 14. ASI مہار زمان OI تھانہ کمبلہ |
| 6. SI تصویر حسین شاہ OI تھانہ چلوٹ | 15. ASI محمد عرفان OI تھانہ داسو |
| 7. SI امتیاز احمد قریشی OI تھانہ پٹن | 16. HC محمد عمر ریڈر جناب SP/inv |
| 8. SI محمد منیر OI تھانہ داسو | 17. ASI سیف الرحمان OI تھانہ بیڑہ |
| 9. SI محمد رازق inv پٹن | 18. شمار زمان IPO انسٹیٹوشن |

میٹنگ کا آغاز باقاعدہ تلاوت کلام پاک سے ہوا بعد از تلاوت کلام پاک SP صاحب نے تمام شرکاء کو خوش آمدید کہا اور ذیل موضوع پر تفصیلی بحث ہوئی۔

لا وارث نیشن۔۔ جب کبھی کوئی لا وارث نیشن مل جائے جس کی شناخت نہ ہو سکتی ہو۔

- 1- نیشن کے دس انگلیوں کے نشانات بذریعہ ہیڈ پرائیوٹ انارک جانگے اگر انگلیاں سگری ہوئی ہوں تو بذریعہ ڈاکٹر صاحب دس انگلیوں کے پورے کاٹ کر علیحدہ علیحدہ بوتلوں میں بند کر کے پانی، گلیسرین وغیرہ ڈالی جائیگی تاکہ پورے خراب نہ ہوں۔ FSL پشاور بھیجا نہیں جائیگے۔
- 2- اسی طرح فوٹو گرافی کی جا کر مشہوری کروائی جاوے۔
- 3- نیشن کی شناخت بذریعہ مشران علاقہ بھی کروائی جاوے۔ اسی طرح نشانات انگشت F.P.U کے ذریعے بھی ادارے سے معلومات لیں

جملہ OIs اور Ois کو نیشن سے عمل درآمد کی ہدایت کی گئی ہے۔

جناب DPP صاحب نے بھی جملہ حاضرین کو نسبت لا وارث نیشن ہدایت دی اور ہر ممکن تعاون قانونی کی یقین دہانی کرائی اور دوران تفتیشی آپس میں تعاون کر کے نیشن کی ہدایت فرمائی۔

اجلاس تشکر کے الفاظ پر اختتام پذیر ہوا۔

Mindia
(محمد صدیق ہیڈ آف انوسی گیشن)
ضلع کوہستان

نمبر 68-460 ریڈر مورخہ 02-04-2015

کاپی برائے اطلاع:-

1. جناب پراونشل پولیس آفسر صاحب خیبر پختونخواہ پشاور۔
2. جناب ڈیشنل انسپکٹر جنرل صاحب آف پولیس انوسی گیشن خیبر پختونخواہ پشاور۔
3. جناب ریجنل پولیس آفسر صاحب ہزارہ ریجن ایبٹ آباد۔
4. جناب ڈپٹی انسپکٹر جنرل صاحب آف پولیس انوسی گیشن IV خیبر پختونخواہ پشاور۔
5. جناب SSP صاحب انوسی گیشن ضلع کوہستان۔
6. جناب DPP صاحب ضلع کوہستان۔
7. جناب DPO صاحب ضلع کوہستان۔
8. جناب DPO صاحب لوہڑ کوہستان۔

Mindia
(محمد صدیق ہیڈ آف انوسی گیشن)
ضلع کوہستان

Attest
Verma

OFFICE OF THE DISTRICT PUBLIC PROSECUTOR

Kohistan.

NO: DPP/Spl/ 264

Dated: 17/11/2014.

35

To,

The Deputy Director Monitoring,

Khyber Pakhtun Khwa,

Peshawar.

Subject: INSTALLATION OF OFFICIAL TELEPHONE.

Respect sir,

It is humbly submitted that the PTCL department install the telephone in the office of under signed by issuing PTCL phone No: 0998-407066 and same will be in operation in next weak InshAllah as the telephone set and cable is not available in Dassu.

The required telephone set and cable would be available in Peshawar or Abbottabad, and the same would be purchased in open market from above mentioned cities.

Information submitted please.


DISTRICT PUBLIC PROSECUTOR

Kohistan.

Attest
Asst. D

Dated: 27.10.2015.

36

To: Mr. PTC

Office of

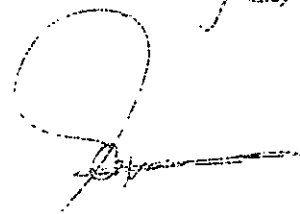
Islamabad

Stamp Billing

It is humbly submitted that the office of undersigned has only one telephone no. 407066 and there is no outstanding against the above telephone number.

The PTC Islamabad issued another phone no. 407075 for the office of undersigned. In fact this office has only one telephone no. 407066 and there is no other connection of telephone.

It is therefore humbly requested to discontinue the telephone bills and cancelled the telephone no. 407075 from the name of District Public Prosecutor, Islamabad and obliged.



Attest
[Signature]



Pakistan Telecommunication Company Limited

PTCL STN: 07-01-8517-013-46
PTCL NTN: 0801599-6

SAY NO TO CORRUPTION

INVOICE

0998-407075

Invoice # 10517060332000
Issue Date: 14-10-2015

37

Account ID/ESN	100000022788
Billing Month	Sep. 2015
Amount Due	Rs. 12,920.00
Due Date	OVERDUE
Amount After Due Date	Rs. 12,920.00

Please Pay IMMEDIATELY

DISTRICT PUBLIC PROSECUTOR OFF
OFFICE KOHISTAN

DASSU
KOHISTAN

000 433

Customer NTN/STN: 1730114140199

SERVICES DETAIL

VOICE FREEDOM PACKAGE Rs. 0.00

SMART TV

Enjoy 140+ live TV channels and hundreds of movies on PTCL Smart TV Service @ Rs.449/month and PTCL Smart TV App @ Rs.49/month. PTCL Smart TV App is available on Google Play and iTunes App Store.

Total: Rs. 0.00

BILL SUMMARY

Voice	Rs. 0.00
Value Added Services	Rs. 0.00
Discount	Rs. 0.00

Total Service Charges Rs. 0.00

Arrears	Rs.12,919.00
Credit	-Rs. 1.00
Services Tax**	Rs. 0.00
W.H.Tax*	Rs. 0.00

Grand Total Rs. 12,920.00

FIXED BROADBAND

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EVO/CHARJI

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BILLED/PAID HISTORY

AUG-15	Rs. 0.00/	Rs. 0.00
JUL-15	Rs. 1,651.00/	Rs. 0.00
JUN-15	Rs. 1,967.00/	Rs. 0.00
MAY-15	Rs. 1,865.00/	Rs. 0.00
APR-15	Rs. 2,100.00/	Rs. 0.00
MAR-15	Rs. 5,336.00/	Rs. 0.00

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111-123-456 | UAN 111-225-111

FOR PAYMENT USE

PTCL STN: 07-01-8517-013-46
PTCL NTN: 0801599-6

Customer ID: 0443300407075 - 31
Account ID: 100000022788
Phone No: 0998-407075 - 31 CK: 7

Invoice # 10517060332000
Billing Month: Sep. 2015
Due Date: IMMEDIATE
Total Amount Due: Rs. 12,920.00
Payable After Due Date: Rs. 12,920.00

Cheque No.:
Amount Paid:
Signature:

Attestur
Wm/D

CUSTOMER CARE CONTACT INFO

Order Booking & Information 111 28 28 28 / 0800 8 0800
 Billing Helpline 1200
 Complaints 1218
 General Information 1236
 Directory Service 1217
 SMS Complaint 05 1218 1218

www.ptcl.com.pk
 For Duplicate Bill Visit: <https://abill.ptcl.com.pk>
 For Feedback/suggestions, email us at: care@ptcl.com.pk
 To update your number at directory service dial 0800 0 1217
<https://www.facebook.com/ptcl.official>
<https://twitter.com/PTCLofficial>

Understand Your Bill Better

DUE DATE: OVERDUE

If your due date states "OVERDUE", it means that the bill has arrears. Please pay immediately to enjoy uninterrupted services.

DISCOUNT

A discount you received by subscribing to a special package, bundle, or promotion.

CALL CHARGES FOR THE MONTH

Charges for the calls made in addition to the free minutes in a package or bundle.

EXTRA USAGE CHARGES

Volume consumed in addition to the package allowance; details available in the Usage Details Section.

SERVICES TAX*

PED/Sales Tax applicable on PTCL services.

WHT TAX*

Advance/Withholding Tax is applicable.



* All Provincial and Federal applicable taxes on PTCL services shall be levied.

Payment Options

FOR IMMEDIATE RESTORATION

If your service is suspended due to non-payment, pay your bill through:

- PTCL Smart Shops, PTCL Bill Payment Machines, PTCL Bill Payment Cards, Credit Card at www.ptcl.com.pk
- Upnisa Service Centers and Franchises
- Internet banking, banks online with PTCL
- NADRA iKiosk
- EasyPaisa, Grand, Upnisa, MobiCash

OTHER PAYMENT OPTIONS

- Banks/ATMs/Over Express/Direct Debit
- Post Office

In case of payment by cheque, your services will be restored after the clearance of your cheque.

PTCL SMART SHOPS

Our Business Hours are from 9:00am to 6:00pm (Monday - Saturday)

DEAR CUSTOMER, CONTINUE TO ENJOY UNINTERRUPTED SERVICES, BY PAYING YOUR BILL BEFORE THE DUE DATE.

اپنی بل کو سمجھنے کے لئے

مقررہ تاریخ اور ڈیوٹی

اگر ڈیوٹی میں "اور ڈیوٹی" لکھا ہے تو اس سے مراد ہے کہ گزشتہ واجبات قابل ادائیگی ہیں۔ برائے مہربانی فوراً رقم ادا کیجئے۔

ڈسکونٹ

کسی بھی ایجنٹل آفر یا پروموشن یا پیکیج کے ساتھ آپ کو فراہم کیا گیا ہے۔

کال چارجز

یکڑا کال، بینڈ کے منٹ منٹس کے علاوہ کئی کالز کے چارجز۔

زیادہ استعمال کے چارجز

ذمہ داری سے زیادہ استعمال کرنے کے چارجز۔

سروس ٹیکس

پی ٹی سی ایل سرورسز پر FED سروس ٹیکس لاگو ہے۔

یکڑا

پی ٹی سی ایل سرورسز پر Advance/Withholding ٹیکس لاگو ہے۔

بل کی ادائیگی کے طریقے

فوری بحالی کے لئے

اگر آپ کی سروس سسپنڈ ہو گئی ہے تو ہمیں فوراً اپنا بل ادا کیجئے۔

• پی ٹی سی ایل سروس سٹاپس، پی ٹی سی ایل بل منسٹر، پی ٹی سی ایل بل منسٹر، پی ٹی سی ایل بل منسٹر۔

• کریڈٹ کارڈ، www.ptcl.com.pk پر۔

• یونین سروس سٹاپس اور فرینچائز۔

• انٹرنیٹ بینکنگ، پی ٹی سی ایل سے آن لائن منسٹر۔

• دیگر بینکنگ سروسز اور ایپس۔

• نیشنل ڈیپازٹ سروس سٹاپس۔

• ڈیپازٹ سروس سٹاپس۔

• ڈیپازٹ سروس سٹاپس۔

• ڈیپازٹ سروس سٹاپس۔

• ڈیپازٹ سروس سٹاپس۔

• ڈیپازٹ سروس سٹاپس۔

• ڈیپازٹ سروس سٹاپس۔

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Pakistan Telecommunication Company Limited

PTCL STN: 07-01-8517-013-46
PTCL NTN: 980-593-6

SAY NO TO CORRUPTION

DISTRICT PUBLIC PROSECUTOR KOH

OFFICE DASHU
OFFICE DASHU
OFFICE DASHU
KOHISTAN

Customer NTN: 57N

INVOICE

0998-407066

Invoice # 10516762158000
Issue Date: 14-10-2015

Account ID/ESN 2103821838

Billing Month Sep. 2015

Amount Due Rs. 0.00

Due Date 05-11-2015

Amount After Due Date Rs. 0.00

38

SERVICE DETAIL

BASIC FIBER RETURN Rs. 0.00
Call Charge for one month Rs. 224.80

SMART TV

Enjoy 140+ live TV channels and hundreds of movies on F. Cl. Smart TV Service @ Rs.44.00 and PTCL Smart TV App @ Rs.44.00. PTCL Smart TV App is available on Google Play and iTunes.

Rs. 224.80

BILL SUMMARY

Service Rs. 224.80
Value Added Services Rs. 0.00
Discount Rs. 0.00

Total Service Charges Rs. 224.80

Debits -Rs. 1,697.00
Credits -Rs. 1,472.00
Services Tax** Rs. 0.00
V.H.Tax* Rs. 0.00

Grand Total Rs. -0.20

FREE BAND

Get 2Mbps Unlimited at the price of 1Mbps for Rs. 1,299/month along with Free Smart TV monthly subscription. (Limited Time Offer)

VOUCHER

Now you can get a 50% angle (free) on a Charji device (on every 10 payments) with no upfront costs. Frankly speaking, it's low as Rs. 750/month. For more details, call 0800-500000000.

BILLED/PAID HISTORY

AUG-15	Rs. 43.00/	Rs. 0.00
JUL-15	Rs. 0.00/	Rs. 0.00
JUN-15	Rs. 0.00/	Rs. 0.00
MAY-15	Rs. 0.00/	Rs. 0.00
APR-15	Rs. 139.00/	Rs. 2,470.00
MAR-15	Rs. 529.00/	Rs. 0.00

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UAN 111 225 111

FOR PAYMENT USE



Customer ID: 0443300487066 - 75
Account ID: 2103821838
Phone No: 0998-407066 - 75 CK: 1

PTCL STN: 07-01-8517-013-46
PTCL NTN: 980-593-6

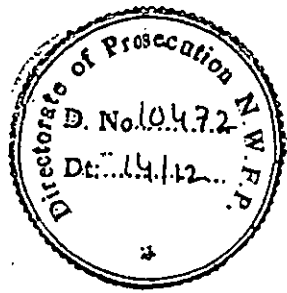
Invoice # 10516762158000
Billing Month Sep. 2015
Due Date 05-11-2015
Total Amount Due Rs. 0.00
Payable After Due Date Rs. 0.00

Cheque No.:
Amount Paid:

Signature:

Attended
Kurd

39



Attest
[Signature]



40

OFFICE OF THE
DISTRICT PUBLIC PROSECUTOR, KOHISTAN
No.339 /Distt: PP, Koh Dated:12/12/ 2015.

To,

WORTHY CHIEF SECRETARY,
KHYBER PAKHTUN KHWA,
PESHAWAR.

THROUGH PROPER CHANNEL.

Subject: DEPARTMENTAL APPEAL.

Respected sir,

It is humbly submitted that the directorate of prosecution Khyber Pakhtunkhwa served the under signed with a notice/ letter NO: DP/ E & A/1 (16) 15 1112 -16 Dated: 01/12/2015, received today Dated: 07/12/2015 through which the copy of ACR for the Period 01/01/2014 to 31/12/2014.

In reply of impugned observation I humbly stated that I regularly performed my duty with great zeal which enshrine from monthly meetings with Judges and Police. Being DDO I also disbursed the monthly salaries among the officials and other budget every month. Similarly other corresponding in official work including providing forth night & monthly reports to Directorate of Prosecution on regular basis which is on record and the same is showing the efficiency of appelland in duty and attendance as well.

Attested
W.M.D.

42

Whereas the responsibility and the issue of Local spp is concerned the appellant being law knowing person, realized the responsibility of his job and did the same satisfactory till now. Furthermore the appellant on his arrival at Kohistan the services of the special public prosecutor withdrawn from the court of Judicial Magistrate Dassu and replaced regular APP there. He never appear in the court of District & Session Judge Dassu. The remarks of the reporting officers is not appealable to mind because the other Deputy Public Prosecutors and Assistance Public Prosecutors are also available in District Kohistan and in presence of regular Public Prosecutors the appellant how can left the station on the mercy of SPP (order of the SPP is attached). Furthermore, the SPP is not allowed to attend the monthly meetings with Bar& Bench including police hence its clear from the above discussion that all meetings and official correspondences have been done by the appellant himself and never shift his official work to anyone including SPP.

Both the honorable reporting/ Counter Signing officer mentioned the impugned observation but neither the appellant remain absent from duty station nor disconnect official telephone rather on the arrival of the appellant there was no telephone and fax facility and after hectic efforts of the appellant the PTCL provide the telephone and fax facility to the office of District Public Prosecutor Kohistan and the same are still in operation and never be disconnected (The record of telephone is attached for ready reference). The credit of the above, honestly is going to appellant but inspite of appreciation the appellant has disappointed.

There is no compliant regarding the absence or irresponsibility from Bench & Bar available on record and nor the Directorate of Prosecution has issued any such like notice or explanation. Furthermore, with due apology the honorable reporting /counter singing officers not fulfilled the legal and code formalities prior to giving the adverse remarks and not serve the appellant with a prior notice/counseling which is the mandatory provision of law on ACR and totally violated the instruction of ACR; issued by Administration Department Khyber PakhtunKhawa.

Attested
Keshu D

421

The appellant is serving at Kohistan since 2013 and the 3rd year is nearest to completion at Kohistan and during this long period no complaint is exist on record from Bar, Bench, Police and General Public. The period of appellant at Kohistan is historical long period in Prosecution history and non from the Prosecutors served at Kohistan for more than 8/10 months, because legally one year tenure is provided by provincial posting transfer policy 2010, but honorable reporting/ counter singing officers did not realized the services of the appellant by giving appreciation but discourage him by giving adverse remarks in the ACR.

The whole service of the appellant is blameless including three year at Kohistan. The appellant is well educated and well conversant and familiar with his job and deserve for further promotion as well as for transfer to central District. Furthermore the appellant never used any political pressure for transfer rather submitted mercy petitions time and again but till now any positive response has not been receive.


It is therefore, humbly requested that the impugned adverse remarks may kindly be expunged from the ACR for the period 01/01/2014 to 31/12/2014 of the appellant.



DISTRICT PUBLIC PROSECUTOR
Kohistan.

Copy to information:

1. Honorable/^{secretary}home & triable affairs Department –
Khyber Pakhtun khwa Peshawar.
2. Honorable Director General Prosecution Khyber Pakhtun khawa

Attested


BEFORE THE HONOURABLE CHIEF SECRETARY KHYBER PAKHTUNKHWA
PESHAWAR

(44)

Subject: MERCY PETITION / DEPARTMENTAL APPEAL.

Respected Sir,

With great deference and heartiest regards I have the honour to submit that:

1. I am a bonafide resident of District Charasadda and settled at Peshawar with kin and kith.
2. I was inducted in the Prosecution Services in the year 2003 on the recommendation of Public Service Commission as Additional Public Prosecutor and posted at District Charasadda.
3. That during service at Charasadda there was no complaint against the applicant from general public as well as from the Bar and Bench rather the services of the applicant were appreciated by District Public Prosecutor Charasadda which reflects from the Annual Confidential Reports of the applicant.
4. That in year 2008 the applicant was promoted to BPS-18 and transferred from Charasadda to Anti Terrorism Court Swat, at that time the movement of Taliban was on peak and none from the public servants was able to discharge official duty at District Swat but the applicant without any hesitation discharged his duties in the Anti Terrorism Court Swat which was the only court to conduct the cases of militants of the whole Malakand Division. The punctuality and regular duty of the applicant is reflected from the order sheets of the court. It is pertinent to note here that the post of Public Prosecutor in Anti Terrorism Court is in BPS-19 and the applicant though junior in BPS-18 was working against the post of BPS-19 due to the efficient performance and devotion with his profession, this fact is also evident from the ACRs/PERs and the efficiency in work could be inquired from the District Public Prosecutor Swat as well as from the Presiding Officers of the court.
5. Recently, the applicant has been promoted to BPS-19 and transferred to District Kohistan, upon which the applicant has some just and legal reservations which are as follow.
 - i) That the applicant served crucial duty in the Hard area for the last 5 years and as per the posting / transfer Rules 2010, an employee can not be transferred from one hard area to another hard area.

Attested
Wahid
Q

- ii) That the applicant conducted prosecution for 5 years in District Swat against the militants who belong to Malakand Division including District Kohistan etc.
- iii) That the applicant also prosecuted Moulana Sufi Mohammad, Moulana Khalid, Moulana Safiullah, Commander Liaqat, Moulana Fazlullah, Sirajuddin etc some of them are on bail and belong to Madyan, Kalam and Besham etc.
- iv) That recently, the applicant was the active member of the team of prosecutors in Malala Yousafzai case and issued legal direction to the joint investigation team from time to time successfully.
- v) That the case of accused namely Mohammad Alam Kohistani is pending for order and the applicant successfully prosecuted him and capital punishment is expected but the said Mohammad Alam Kohistani belongs to District Kohistan and his family identified the applicant in the court because there is no in-camera trial system to conceal the identification of the prosecutors as well as the judge during the course of trial.
- vi) That the applicant was and is under threats of the militants.
- vii) That District Kohistan is not only a hard area but also insecure especially for the applicant due to the above reasons.

Attended
Arif M/D

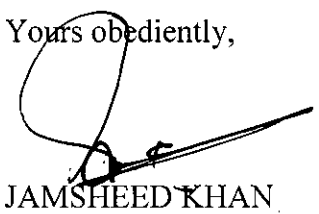
- 6. That the district Kohistan on the one hand is insecure for the applicant and on the other against the norms and spirit of the posting / transfer Rules 2010, furthermore, the road leading from Mingora to District Kohistan passes through Manglor, Charbagh, Khwazakhela and Namal areas of District Swat and Alpuri, Karora and Besham areas of District Shangla which are hubs of the militants / miscreants and thereby the risk / threat to the life of the applicant would persistently prevail throughout the journey to District Kohistan.
- 7. That in case of any mishap, who will be responsible, it is worth mentioning that some of the prosecutors are performing their jobs in their home districts while others are in the Directorate of Prosecution for the last 8/10 years on different pretext. According to law they are also prosecutors and their recruitment was made for the court work in field but due to proxy vote of the high ups, they still stick in Directorate on these posts since long.

- 8. That all the promotees are retained on their existing posts while discriminatory treatment is done with the applicant which is against law and Constitution, based on malafide. It is mandatory that at the time of posting / transfer the length of posting / stay of each transferee is to be observed, as without observing the length of posting / stay on a station, would be a clear violation of posting / transfer Rules 2010 and discrimination as well.

- 9. That the applicant is neither a political figure nor have any approach except the Almighty ALLAH.

It is, therefore humbly prayed that in light of the above facts and circumstances, the impugned transfer order of the applicant may please be cancelled and the applicant may kindly be retained at his present post i.e Senior Public Prosecutor Anti Terrorism Court-I, Swat BPS-19 or he may please be transferred to a suitable and protected down districts.

Yours obediently,



JAMSHEED KHAN
SENIOR PUBLIC PROSECUTOR
ANTI TERRORISM COURT-I SWAT

Attested
W.M.T.D

OFFICE OF THE DISTRICT PUBLIC PROSECUTOR KOHISTAN.

47

No. 243 Dpp (KH)

Dated: 13/11/2014

To,

The Director General of Prosecution,
Khyber pakhtun khwa,
Peshawar.

Subject: CURSORY MINUTES OF THE MEETINGS.

Respect sir,

I have the honor to submit that the under signed held a meeting with the superintendent of police (investigation) preside by District police officer kohistan, today Dated:12/11/2014 in the office of District police officer kohistan, some major issues remained under discussion, related with investigation.


The core issue raised by the under signed regarding the non appearance of official Prosecution witnesses for evidence before the court despite of service. Further the under signed point out that the service of the summon is not conducted by DFC properly, and usually endorsed his report on the back of summon in stereotype, which is not acceptable to the court.

Both the police officer promised for ensuring the production of PWS in each and every case without any excuse. They further stated that the delinquent police officer/official would be prosecuted departmentally. Other relevant problems were also discussed. Participant have agreed to keep liaison and cordial relation with each other for the end of justice.

Information submitted please.

Copy for information to
Honourable Distt & Sessin
Judge Kohistan at Dargue.

Abdullah
Usman
AD


DISTRICT PUBLIC PROSECUTOR
kohistan.

Office of the district public prosecutor

Kohistan

NO: DPP/Spl/ 258

Dated 11 /11/2014.

48

TO,

THE Worthy Direct General Prosecution

Khyber pakhtun khwa peshawar.

Subject:

REQUEST FOR CREATION OF POST OF JUNIOR /SENIOR CLERKS AND OFFICE

ASSISTANT ALONG WITH TWO ASSISTANT PUBLIC PROSECUTOR.

Respected sir,

I have the honour to submit that this office has only one junior clerk namely Sadar Ayub and he is the only one junior clerk to conduct the whole work of prosecution in District Kohistan, so this Office is needed more ministerial staff mentioned above for the Smooth running of Prosecution work as well as for furnishing the necessary information to the Directorate in time.

The already available junior clerk Sadar Ayub is most efficient and try his best to control the burden of work but the same is out of his control due to the enhanced ratio of work. He was indulge in the Prosecution service in the year of 2007 and at the time the office work and court work was too less than present. Currently the court work as well as the office work has been increase due to the passage of time and now a single person can't be able to control the same burden of work. More over the provincial government has declared the lower kohistan a separate district for which a separate ministerial staff is also required for smooth running of prosecution work including two Assistant Public Prosecutor.

It is therefore humbly requested that the subject post may kindly be created for Kohistan, with the further request that the recruitment may kindly be made on the Said post if created on priority basis, to meet with the necessity in the best interest of Prosecution work and obliged.

Attested
[Signature]

[Signature]
DISTRICT PUBLIC PROSECUTOR

KOHISTAN.

Peshawar.

OFFICE OF THE DISTRICT PUBLIC PROSECUTOR KOHISTAN

99

No 262 Dpp (KH)

Dated: 13/11/2014

To,

The Worthy secretary,
Home and tribal Affairs Department,
Khyber pakhtun khwa,
Peshawar.

Subject: **Request for Sympathetic Consideration.**

Respect sir,

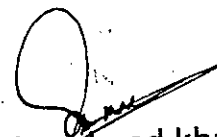
With great deference and heartiness regard, it is humbly submitted that the under signed has been completed one year hard area tenure with the grace of Allah almighty in June 2014, and now deserve for transfer to down districts, as per provincial posting /transfer policy 2010. Before this posting, I also served for 5 year in ATC swat in a very crucial period. It is pertinent to note here that the post of District public prosecutor is vacant at BATKHELA MALAKAND.

Basically the applicant is the permanent resident of District charsadda and now settle in Peshawar with family. Furthermore the applicant having school going children and they are needed strict supervision of the under signed and in absence, the apprehension is exist to suffer their education.

Keeping in view the above facts and situation, It is therefore, humbly requested that the applicant may kindly be Posted/transfer to down District. With thanks.

Copies:

Attested
Kerim R


Jamsheed Khan

DISTRICT PUBLIC PROECUTOR
kohistan.

1 - Director General of prosecution
Khyber pakhtun khwa
Peshawar.

OFFICE OF THE DISTRICT PUBLIC PROSECUTOR

Kohistan.

NO: DPP/Spl/ 2-16

Dated: 02/10/2014.

To,

The Director General Prosecution,
Khyber Pakhtun khwa,
Peshawar.

Subject: FACILITY OF OFFICE ACCOMMODATION.

Respect sir,

I have the honour to submit that the owner of the building served us with a notice of ejection and demanding unreasonable monthly rent Rs:25000/. Presently we are paying Rs:12000/per month. Now it is brought in to the notice of undersigned that the lawyer community of district kohistan has constructed a new Bar Room building while the old Bar Room building will be vacant on their shifting to new building, the old Bar room building is the sole property of state and under the immediate control of Deputy Commissioner kohistan. It is further submitted that the building of old Bar Room is very feasible, easily approachable and having enough capacity.

It is therefore, humbly requested that Deputy Commissioner kohistan may please be approached for providing the said building to the Prosecution for office purpose.

Attested
[Signature]


JAMSHED KHAN

DISTRICT PUBLIC PROSECUTOR

Kohistan.

OFFICE OF THE DISTRICT PUBLIC PROSECUTOR

Kohistan.

NO: DPP/Spl/ 217

Dated: 2/10/2014.

57

To,

The Director General of Prosecution,
Khyber Pakhtun Khwa Peshawar.

Subject: EJECTION NOTICE IN RESPECT OF RENTED BUILDING HIRED FOR
PROSECUTION OFFICE IN DASSU.

Respected sir,

Consequence upon the ejection notice by the owner of building, it is humbly submitted that the owner of the building demanded 25000/Rs rent per month, ^{instead of 1200/-} which is unreasonable he shows the cause for enhancement in rent, as the arrival of E.N.G.Os personal as well as other people to Dassu for construction of Dassu dam and Basha dam. He further stated that the Ex/Engineer of WAPDA has offered him rupees 25000/per month for the said building. Though the instant building is feasible one, situated near to the District courts but the demand of owner of the building is not appealable to prudent mind.

It is therefore, humbly requested that suitable advise/guide line may kindly be granted, to follow the same in future please.

*Attested
Kerwal D*


DISTRICT PUBLIC PROSECUTOR

Kohistan.

OFFICE OF THE DISTRICT PUBLIC PROSECUTOR KOHISTAN

(52)

No. 200 Dpp (KH)

Dated: 4/9/2014

To,

The Director General Prosecution,
Khyber pakhtun khwa,
Peshawar.

Subject: Request for Sympathetic Consideration.

Respect sir,

With great deference and heartiness regard, it is humbly submitted that by the grace of Allah almighty, I have completed one year hard area tenure in the Month of May 2014 and presently my tenure is above. Before this posting, I also served for 5 year in ATC swat in a very crucial period.

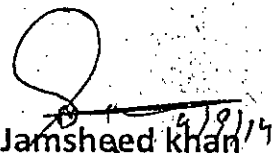
Basically I am the resident of District charsadda and settle in Peshawar with family. Keeping in view my above tenure, I deserve for Posting / transfer to down district as per Posting/transfer policy 2010.

It is therefore humbly requested that I may kindly be Posted/transfer to down District.

With thanks.

Copies:

1. Chief secretary Khyber
Pakhtun khwa Peshawar.
2. Secretary Home and tribal affairs
Khyber Pakhtun khwa Peshawar.


Jamsheed Khan

DISTRICT PUBLIC PROECUTOR
kohistan.

Attest
Wahid D

OF THE DISTRICT Public Prosecutor Kohistan,
45 DPP KH Dated -06-2014.

The Director General Prosecution,
Khyber Pukhtun Khwa,
Peshawar,

(53)

Subject, IDENTIFICATION OF LAND FOR PROSECUTION
OFFICES

R/Sir, Reference to your office letter NO DP/EO-A (19)
6985-7009 Dated June-9-2014.

It is humbly submitted that, new judicial complex
in district Kohistan at Darsu is already under
construction. Therefore, existing district courts will
shift in the buildings of new judicial complex and
existing district court buildings are state lands,
will remain for Prosecution offices, as per verble
promise of Honourable District and Sessions Judge
Kohistan.

Therefore undersigned identifies the state
land i.e. existing district courts building for
Prosecution offices.

Reply Submitted Please.

Attest
Kern/D


District Public Prosecutor
Kohistan

54

OFFICE ORDER.

Consequence upon the posting of M. illyas APP. The Prosecution work is distributed as following.

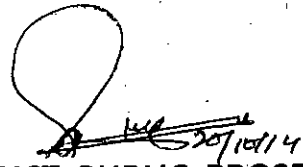
Mr. Changaiz khan Deputy PP shall attend the court of District & Session Judge kohistan at dassu.

Mr. Illyas khan APP shall attend the court of Senior Civil Judge /Judicial Magistrate kohistan at dassu.

S.No	Name of PP	Name of Court
1	Mr. Changaiz khan	District & Session judge kohistan.
2	Mr. Illyas khan	Senior Civil judge/Judicial Magistrate kohistan.

On the criminal cases day one of the regular Public Prosecutor among us will attend the court of Judicial Magistrate kohistan at pattan.

This order will be operatable immediately.


DISTRICT PUBLIC PROSECUTOR

Kohistan.

Copy to

Honorable Senior Civil Judge.

Attested
Verma/D

بعدالت

سموس ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ

55

موردہ

محمد خان ولد خان داس

2 پنجاب

مقدمہ

بنام

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام سموس ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ کے جگہ اور اس کے لئے (اندر کا شہر) جان انڈیا کے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پرداخت منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

2006

ماہ اسی

المرقوم

العبد العبد العبد

کے لئے منظور ہے۔

مقام

ACCEPTED
-Wasm
محمد خان داس

(17)

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

IN SERVICE APPEAL NO.448/2016

JAMSHEED KHAN

.....PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa, through Chief Secretary Khyber Pakhtunkhwa, Peshawar and others Respondents

PARA-WISE COMMENTS ON BEHALF OF RESPONDENTS

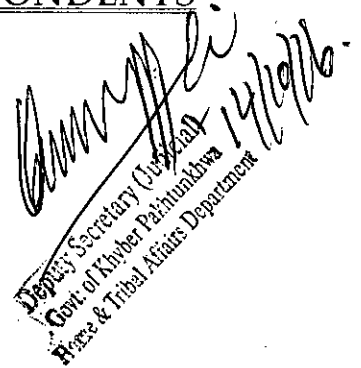
Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action.
2. That the appellant has got no locus standi to file the instant appeal.
3. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
4. That the appeal is not maintainable in its present form.
5. That the appellant is estopped by his own conduct to file the appeal.
6. That the appellant concealed material facts from this Honourable Tribunal.
7. That the appeal is time barred.
8. That the appellant has not come to this Honourable Tribunal with clean hands.

FACTS:-

1. Para No.1 pertains to record, hence needs no comments.
2. Para No.2 pertains to record, hence needs no comments.
3. Para No.3 pertains to record, hence needs no comments.
4. Para No.4 pertains to record, hence needs no comments.
5. Para No.5 is correct.


Deputy Secretary (Judicial)
Govt. of Khyber Pakhtunkhwa
Home & Tribal Affairs Department
14/9/16

6. Incorrect. Explanation has been called by the Respondent No.4 in respect of remaining absent from his duty without any leave, failing to reactivate the official telephone for more than 03 months and failed to attend a meeting of the Criminal Justice coordination committee on 27-07-2014 nor could depute Deputy Public Prosecutor or Assistant Public Prosecutor, upon reply of the explanation displeasure notice was issued by the competent authority (copy enclosed as Annexure-A and Annexure-B respectively).
7. Para No.7 is misconceived as no documents have been annexed with the appeal.
8. With respect to Para No.8, it is submitted that the appellant, being a Government Servant, is bound to abide by the Law, Rules and Regulations made under the Khyber Pakhtunkhwa Civil Servants Act, 1973.
9. Incorrect. The appellant was explicitly directed by the competent authority to reactivate the office telephone number but he failed to do so.
10. Para No. 10 needs no reply.
11. The appellant has properly been proceeded by the Respondent No.2 & 4 due to his misconduct towards his official duties, therefore, recorded adverse remarks in the PER, thus the appeal is baseless having no legal footings and merely to waste precious time of this Honourable Service Tribunal.

[Handwritten Signature]
Deputy Secretary (Judicial)
Govt. of Khyber Pakhtunkhwa
Home & Tribal Affairs Department


GROUNDS

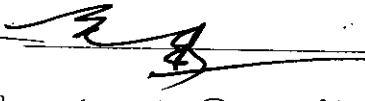
- a) Incorrect. The adverse remarks in the PER of Petitioner of the No.2 and 4 are based on his poor performance towards his official duties as explained vide Para No.6 above.
- b) Incorrect, as there is no need of advance notice, show cause notice before recording PERs, hence without any legal basis.
- c) Incorrect, No violation of any law has been committed by the Respondents as Explanation has been called from the appellant by the Respondent No.4. Moreover, displeasure notice has also been issued to the appellant by the Respondent No.4 to be careful in future otherwise disciplinary proceedings would be initiated against him under relevant Rules/ Laws, hence denied.

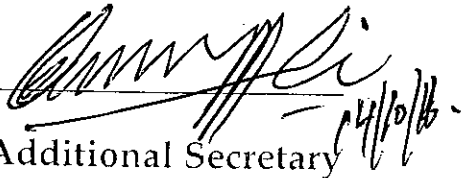
- d) Incorrect, as replied in above paras.
- e) Incorrect, as replied in Para no.6 of the facts.
- f) Incorrect, as the Respondents did not receive any appreciation letter from District and Session Judge, Kohistan, District Police Officer, Kohistan, Superintendent of Police (Investigation), Kohistan and President of District Bar Kohistan. Moreover, the appellant badly failed to attach any appreciation letter in support of this ground.
- g) Correct to the extent that the appellant served in Anti-Terrorism Court, Swat prior to the present posting, while rest of para is baseless as the duty of every Prosecutor is to prosecute the criminal cases on behalf of the State whether Magisterial Court, Session Court, Anti-Terrorism Court or any other Special Court without fear and favor and for the sake of public interest.
- h) Para (h) is legal.
- i) Incorrect. Para already explained above.

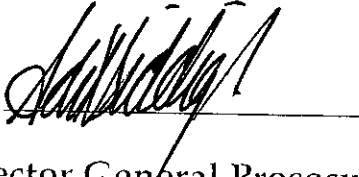
PRAYER:

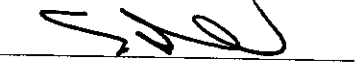
It is, therefore, most humbly prayed that on acceptance of the para-wise comments, the instant appeal, may graciously be dismissed with special cost.

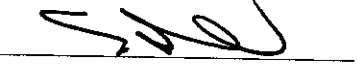

 Chief Secretary to Govt of
 Khyber Pakhtunkhwa,
 (Respondent No.1)


 Secretary to Govt of KPK
 Home & Tribal Affairs Department,
 (Respondent No.2)


 Additional Secretary
 Home & Tribal Affairs Department,
 (Respondent No.3)


 Director General Prosecution
 Khyber Pakhtunkhwa,
 (Respondent No.4)


 Deputy Secretary (Judicial)
 Govt. of Khyber Pakhtunkhwa
 Home & Tribal Affairs Department


 Director Legal (Prosecution)
 Directorate of Prosecution,
 Peshawar
 (Respondent No.5)

Annexure-A



DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No. DP/EXA/1(106)/9243
Dated Peshawar 17th October, 2014

Office Phone # 091-9212559/ 091-9212542
Fax # 091-9212559
E-mail: kprosecution@yahoo.com

To

The District Public Prosecutor,
Kohistan.

Subject: - **EXPLANATION.**

I am directed to refer to the subject noted above and to say that this Directorate has taken a very serious notice of the following shortcomings on your part:-

- i. You usually remain absent from your duty. On 15th October, 2014, you left your station of duty without any prior permission or leave.
- ii. The Director General Prosecution had explicitly directed you to reactivate the office telephone number in your office but you failed to do so for more than 3 months. It speaks of your lethargy in taking interest in your duties and to keep your whereabouts in mystery.
- iii. You failed to attend a meeting of the Criminal Justice Coordination Committee on 27/07/2014, nor could you depute the Deputy Public Prosecutor or Assistant Public Prosecutor. Rather, it was attended by an unauthorized Special Public Prosecutor because you and your subordinates have left everything to him.

Your this acts clearly falls within the ambit of misconduct, therefore, you are called upon to clarify your position regarding your above mentioned acts within three days positively, otherwise in case of no reply, ex-parte proceedings will be initiated against you under the relevant rules.


(LIAQAT ALI)

Deputy Director Admin/ Finance

Annexure-B



**DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA**

No. DP/EXA/1(106)/10222.
Dated Peshawar 12th November, 2014

Office Phone # 091-9212559/ 091-9212542
Fax # 091-9212559
E-mail: kpprosecution@yahoo.com

To

Mr. Jamsheed Khan,
District Public Prosecutor,
Kohistan.

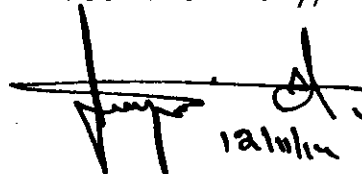
Subject: - **DISPLEASURE NOTICE.**

I am directed to refer to your reply to the explanation submitted by you vide letter bearing No. 242 dated 28/10/2014 and to say that the competent authority has passed the following remarks on your reply:-

***"My displeasure should be conveyed to him
and he may be strictly warned to be careful
in future"***

You are, therefore, warned to be careful in future otherwise strict disciplinary proceedings will be initiated against you under the relevant Rules/law.

Your's faithfully,


(LIAQAT ALI)

Deputy Director Admn:/Finance

ob

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