


FORM OF ORDER SHEET

Court of _____

Appeal No. 2442 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/11/2023	<p>The appeal of Mr. Muhammad Arshad received today by registered post through Sardar Muhammad Azeem Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Arshad son of Muhammad Hassan Assistant Office of DPP Battagram received today i.e on 16.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged /marked with annexures marks.
- 2- Annexures-A, C & F of the appeal are illegible.

No. 3420 /S.T,

Dt. 17/10 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Sardar Muhammad Azeem Adv.
High Court A.Abad.

Please re submit
after removing the
objection

Mu Azeem
20/11/23

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

Service Appeal No. 2442/2023

Muhammad Arshad

...APPELLANT

VERSUS

Secretary to Govt. of Khyber Pakhtunkhwa Home and Tribal Affairs
Departmental Peshawar and another

...RESPONDENTS

SERVICE APPEAL

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2.	Copy of order dated 11.02.2019 <i>with better copy</i>	"A"	888-1
3.	Copy of seniority list	"B"	97014
4.	Copy of impugned order dated 08.08.2023 and final seniority list 2023	"C", "D"	15 to 18
5.	Copy of Departmental appeal and order	"E" & "F"	19 to 20
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...APPELLANT

Through Counsel:

Dated:- 11/10/2023

(SARDAR MUHAMMAD AZEEM)
Advocate High Court Abbottabad

0312 9832024

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 2442/2023

Muhammad Arshad S/o Muhammad Hassan Assistant Office of District
Public Prosecutor Battagram.

...APPELLANT

VERSUS

1. Secretary to Govt. of Khyber Pakhtunkhwa Home and Tribal Affairs
Departmental Peshawar.
2. Director General Prosecution Khyber Pakhtunkhwa Peshawar.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED
ORDER NO. DP/F&A08A08/10063-70 DATED 08/08/2023
AND FINAL SENIORITY LIST OF ASSISTANT YEARS 2023
IN WHICH REGULAR SERVICE OF THE APPELLANT
AGAINST THE POST OF ASSISTANT B.P.S 16 HAS BEEN
ILLEGALLY CONVERTED TO ACTING CHARGE BASES
WHICH IS AGAINST THE LAW RULES AND NOT
SUSTAINABLE UNDER THE LAW AND LIABLE TO BE SET-
ASIDE.


A
16/10/23

PRAYER:-

ON ACCEPTING OF THIS APPEAL IMPUGNED ORDER NO. DP/F&A08/10063-20 DATED 08/08/2023 MAY KINDLY BE SET ASIDE AND THE RESPONDENT MAY GRACIOUSLY BE DIRECTED TO RESTORE THE REGULAR SERVICE OF THE APPELLANT AS AN ASSISTANT WITH ALL BACK BENEFITS IN THE INTEREST OF JUSTICE.

Respectfully Sheweth,

1. That the appellant was initially appointed as a Naib Qasid on 08/10/1996 and performed his duty honestly and devotedly to the satisfaction of his superior, therefore respondents granted promotion to appellant against the post of junior clerk on 10.03.2003 in accordance with law.
2. That thereafter due to satisfactory service of the appellant against the post of junior clerk he was promoted against the post of senior clerk on 08.02.2016 in accordance with law, rules and policy.

3. That subsequently the respondents after approval of DPC having of prescribed qualification eligibility and fitness granted the promotion to appellant against existing vacant post of Assistant B.P.S 16 on regular basis vide order 952-75 dated 11.02.2019. (Copy of order dated 11.02.2019 is annexed as Annexure "A")
4. That the appellant after promotion against the post of Assistant BPS-16 continuously performed his duty against the said post to the satisfaction of his superior officer and no any complaint against the appellant.
5. That the respondent issued final seniority list of Assistant B.P.S-16 in year 2021-22 in which the name of the appellant mentioned at serial No.14/12 as a regular employee. (Copy of seniority list are annexed as Annexures "B")

6. That the respondent issue impugned order on 09.08.2023 and final seniority list of Assistant in year 2023 under which regular service of the appellant converted to acting charge bases,

which is illegal, against the law, discriminatory ,
Thus not sustainable and liable to be set aside.

**(Copy of impugned order dated 08.08.2023
and final seniority list 2023 are annexed as
Annexure C&D**

7. That the appellant filed departmental appeal against impugned order dated 08.08.2023 and final seniority list year 2023 which was decided by the respondents No.2 arbitrarily without any lawful reason on 16.09.2023. **(Copy of Departmental appeal and order is annexed as Annexure "E" & "F")**

GROUNDS:-

- a. That the appellant, was regularly promoted against the post of Assistant BPS-16 and he performed his duty continuously against the said post to the satisfaction of his Superior Officer, therefore promotion order has been implemented and the appellant has occurred vested rights based on the said promotion order, now the respondents have no power under the law to change / convert the regular

service of the appellant to acting charge base thus the impugned order is void illegal, contrary to law rules and natural justice, hence not sustainable.

b. That the impugned order dated 08.08.2023 and final seniority list year 2023 issued by the respondent on the bases of malafide and in violation of Article 4 & 25 of Constitution, hence not sustainable.

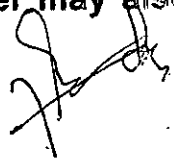
c. That the person who was promoted alongwith the appellant in the post of Assistant B.P.S 16 on 11.02.2019, respondent not only kept its regular service, but also promoted it to the post of Superintendent B.P.S 17 and the appellant regular service converted into acting charge bases thus the action of respondents based on discrimination.

d. That the instant Service appeal is well within time.

e. That the other points shall be urged at the time of arguments.

PRAYER:

It is therefore humbly prayed that on acceptance of this appeal the impugned order dated 08.08.2023 may kindly be set aside and respondents No. 1 & 2 may graciously be directed to restore regular service of the appellant with all back benefit in the interest of justice any other relief which deem fit and proper may also be granted.



...APPELLANT

Through Counsel:**Dated:- 11/10 /2023**

(SARDAR MUHAMMAD AZEEM)
 Advocate High Court Abbottabad
VERIFICATION:-

*Verified that the contents of the instant **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Tribunal and no such like service appeal has earlier been filed before this Hon'ble tribunal or any other Court of Law.*


Dated:- 11/10 /2023

...APPELLANT

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

Service Appeal No. /2023

Muhammad Arshad

...APPELLANT

VERSUS

Secretary to Govt. of Khyber Pakhtunkhwa Home and Tribal Affairs
Departmental Peshawar and another

...RESPONDENTS

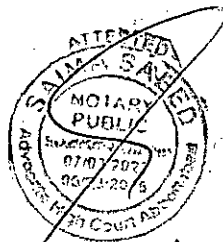
SERVICE APPEAL

AFFIDAVIT

I, Muhammad Arshad S/o Muhammad Hassan Assistant Office of District Public Prosecutor Battagram, Appellant, do hereby solemnly affirm and declare on Oath that the contents of instant **Service Appeal**, are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:- 15/10/2023

...DEPONENT



14/10/23

6A

8

DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA



No. _____
Dated Peshawar 11/10/2019 }
Office Phone # 091-9212559
Fax # 091-9212559
E-mail kp prosecution@yahoo.com

ORDER:

No. DP/ESA/1(100)/952-75

On the recommendation of the Departmental Promotion Committee (D.P.C.), the following Senior Clerks (BPS-14) of this Directorate are hereby promoted to the post of Assistant (BS-16), on regular basis with immediate effect:-

S.No	Name	Present Posting
1	Shakeel Akhtar	Office of the District Public Prosecutor, Abbottabad.
2	Syed Ibrar Shah	Office of the District Public Prosecutor, Torghar.
3	Sakhawat Shah	Office of the District Public Prosecutor, Buner.
4	Muhammad Afshar	Office of the District Public Prosecutor, Abbottabad.
5	Malik Rehmat Ali	Office of the District Public Prosecutor, Peshawar.
6	Yaqoob Khan	Office of the District Public Prosecutor, Karak.
7	Khairullah Jan	Directorate of Prosecution
8	Fida Muhammad	Directorate of Prosecution
9	Muhammad Yousof	Office of the District Public Prosecutor, Bannu.
10	Aurangzeb	Office of the District Public Prosecutor, Dir Lower.
11	Ajmal Khan	Office of the District Public Prosecutor, Swabi.
12	Sahibzada	Office of the District Public Prosecutor, Swabi.
13	Said Rehman	Office of the District Public Prosecutor, Malakand.
14	Tariq Ahmad	Office of the District Public Prosecutor, Swat.
15	Syed Alam Shah	Office of the District Public Prosecutor, Manshra.
16	Hazrat Muhammad	Office of the District Public Prosecutor, Malakand.
17	Tchan Alam	Office of the District Public Prosecutor, Shangla.

2. The above officials will be on probation for a period of one year in terms of section-6(2) of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rules-15(1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

—sd/—
(Director General Prosecution)
Directorate of Prosecution,
Khyber Pakhtunkhwa

Copy Forwarded for Information to the:-

1. Accountant General Office, Khyber Pakhtunkhwa, Peshawar
2. Concerned District Public Prosecutor Offices.
3. Concerned District Accounts Offices.
4. Officials concerned.
5. P.S to Secretary to Govt. of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Peshawar.
6. PA to Director General Prosecution, Khyber Pakhtunkhwa.
7. Establishment Section of this Directorate.

[Signature]
Director Administration

ATTESTED

District Public Prosecutor
Manshra

[Signature]
District Public Prosecutor
Manshra

BETTER COPY

8-1

DIRECTORATE OF PROSECUTION KHYBER
PAKHTUNKHWA

No.

Dated Peshawar 11/02/2019

Office Phone# 091-9212559

Fax# 091-9212559

E-Mail: Kpprosecution@yahoo.com

ORDER:

No. DP/F&A/1(100)/952.75 on the recommendation of the departmental promotion committee (P.P.C). the following Senior Clerks (Bps-14 of this Directorate are hereby promoted to the post of Assistant (BPS-16) regular basis with immediate effect:-

S.No	Name	Present Posting
1.	Shakeel Akhtar	Office of the District Public prosecutor, Abbottabad
2.	Syed Ibrar Shah	Office of the District Public prosecutor, Torghar.
3.	Sakhawat Shah	Office of the District Public prosecutor, Buner.
4.	Muhammad Arshad	Office of the District Public prosecutor, Abbottabad <i>Mansehra</i>
5.	Malik Rehnat Ali	Office of the District Public prosecutor, Peshawar.
6.	Yaqoob Khan	Office of the District Public prosecutor, Karak.
7.	Khairullah Jan	Directorate prosecution.
8.	Fida Muhammad	Directorate prosecution.
9.	Muhammad Yousaf	Office of the District Public prosecutor, Bannu
10.	Auranzeb	Office of the District Public prosecutor, Dir Lower.
11.	Ajmal Khan	Office of the District Public prosecutor, Swabi.
12.	Sahibzada	Office of the District Public prosecutor, Swabi.
13.	Said Rehman	Office of the District Public prosecutor, Malakand.
14.	Tariq Ahmad	Office of the District Public prosecutor, Swat.
15.	Syed Alam Shah	Office of the District Public prosecutor, Mansehra.
16.	Hazrat Muhammad	Office of the District Public prosecutor, Malakand.
17.	Jan Alam	Office of the District Public prosecutor, Shangla

2. The above officials will be on probation for a period of one year in terms of section 6(2) of the Khyber Pakhtunkhwa civil servant Act, 1973 read with rules 15(1) of the Khyber Pakhtunkhwa Civil servants (Appointment, Promotion and Transfer) Rules 1989.

Attested
Sardar Muhammad
Aziz Khan
Sole Counsel
Abbottabad

Sd/-
(Director General Prosecution)
Directorate of prosecution,
Khyber Pakhtunkhwa

Copy forwarded for information to the:-

1. Accountant General Office, Khyber Pakhtunkhwa, Peshawar.
2. Concerned District Public Prosecutor offices.
3. Concerned District Accounts offices.
4. Officials concerned.
5. P.S to Secretary to Govt. of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Peshawar.
6. PA to Director General Prosecution, Khyber Pakhtunkhwa.
7. Establishment Section of this Directorate.

Directorate Administration

“B”

2021 Final

9

DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No. DP/E-1/1(66)14049-89

Dated Peshawar 20/10/2021

Office Phone # 091-9212559

Fax # 091-9212559

E-mail kpprosecution@yahoo.com

All District Public Prosecutors,
Khyber Pakhtunkhwa.

Attention: All Assistants (BS-16) and Junior Clerks (BS-11).

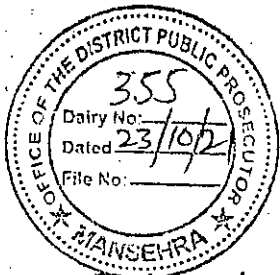
Subject: - FINAL SENIORITY LIST OF ASSISTANTS (BPS-16) AND JUNIOR CLERKS (BPS-11).

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of "Final Seniority List" of the Assistants (BS-16) and Junior Clerks (BS-11) working at the strength of Directorate of Prosecution. The same may be handed over to all the officials concerned working under your kind control for information and further necessary action, please.

Yours sincerely,

[Signature]
Deputy Director Administration



Encl: (as above)

Copy forwarded for information to the:

1. All Regional Director Prosecution Khyber Pakhtunkhwa.
2. PA to Director General Prosecution, Khyber Pakhtunkhwa.

*Mr. Tariq (Support) to inform the
Officials concerned.*

[Signature]
Deputy Director Administration

*R/Sir
noted
Handed 10
25/21*

[Signature]
25/10/21 DP

[Signature]
25/10-21

Attested
[Signature]

10

FINAL SENIORITY LIST OF OFFICE ASSISTANT BPS-16, IN DIRECTORATE OF PROSECUTION PESHAWAR Khyber Pakhtunkhwa, 2021

Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post			Present Posting
				Date	BS	Method of Recruitment	
1. Muhammad Hamayoon	B.A.	28/10/1967 Lakki Marwat	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, orakzai
2. Qamar Zaman	B.A.	20/01/1970 Tank	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, south Waziristan
3. Muslim Khan	Matric	07/01/1966 Charsadda	26-07-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Peshawar
4. Sikandar Hayat	Matric	15/11/1964 Dir Lower	15-08-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	appointed as superintendent (bs-17) on acting charge basis office of the district public prosecutor, upper dir
5. Mubarik Ahmad	F.A.	04/12/1961 Charsadda	29-11-1987 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of prosecution, Charsadda
6. Muhammad Iqbal	B.Com	05/05/1970 Lakki Marwat	13-09-1989 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Base Office of the District Public Prosecutor, Bannu
7. Shahid Gul	Matric	05/05/1963 Kohat	19-09-2000 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss DPP Kurram.
8. Mumraiz Khan	Matric	04/04/1970 Peshawar	19-09-2000 Naib Qasid BS-01	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss Directorate of Prosecution, Khyber
9. Shakeel Akhtar	Matric	15/03/1977 Nowshera	17-04-1994 Assistant BS-16	11/02/2019	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss DPP Mohammad
10. Syed Ibrar Shah	Matric	1976 Mansehra	10-03-2003 Naib Qasid BS-01	05/04/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Torghar
11. Syed Hakeem Shah	Matric	05/02/1962 Buner	30-06-1996 Junior Clerk BS-05	17/11/2017	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Buner

Handwritten signature and stamp

S.NO	Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post			Present Posting
					Date	BS	Method of Recruitment	
12.	Abdul Wahid	Matric	16/03/1972 Tank	10-03-2003 Junior Clerk BS-05	17/11/2017	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, tank
13.	Sakhawat Shah	B.A	10/04/1975 Buner	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, swat
14.	Muhammad Arshad	Matric	01/06/1977 Mansehra	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, batagram
15.	Malik Rehmat Ali	Matric	04/04/1981 Peshawar	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Khyber
16.	Muhammad Yousaf	B.A	24/04/1964 Bannu	24-04-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Bannu
17.	Aurangzeb	Matric	01/03/1963 Dir Lower	17-08-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, DIR LOWER
18.	Ajmal Khan	Matric	24/11/1967 Swabi	03-12-1989 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWABI
19.	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Swabi
20.	Said Rehman	F.A	20/03/1974 Swat	26-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWAT
21.	Tariq Ahmad	Matric	03/04/1975 Swat	27-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWAT
22.	Syed Alam Shah	Matric	13/02/1974 Mansehra	15-03-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Mansehra
23.	Hazrat Muhammad	B.A.	01/01/1970 Malakand	23-07-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Malakand
24.	Jehan Alam	B.A.	07/03/1984 Shangla	12-04-2007 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Shangla
25.	Ismail Khan	B.A	10-01-1982 MALAKAND	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at Office of the District Public Prosecutor, Charsadda
26.	Raisul Ahrar Bacha	B.S (Zoology)	05-07-1994 SWAT	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at DIRECTORATE OF PROSECUTION
27.	Saba Gul	B.S(BOT ANY)	16-01-1995 MARDAN	24-06-2019 Assistant BS-16	24-06-2019	16	Appointed through KPPSC	Assistant (BS-16) at Nowshera
28.	Muhammad Ali Shah	LLB (Hons)	26-11-1989 Abbottabad	03-09-2019 Assistant BS-16	03-09-2019	16	Appointed through KPPSC	Assistant (BS-16) at District Public Prosecutor Abbottabad
29.	Hanif-ur-	MA(Political)	01.03.1980 Bajaur	01.12.2004 Assistant BS-16	01.07.2019	16	Adjustment surplus pool	On deputation(education deptt)

Handwritten signature and initials

Khan.

12

DIRECTORATE OF PROSECUTION
KHYBER PAKHTUNKHWA

No. DP/E- A/1(66) 6675 - 6720

Dated Peshawar 25/04/2022

Office Phone # 91-9212559

Fax # 091-9212559

E-mail kpprosecution@yahoo.com



To

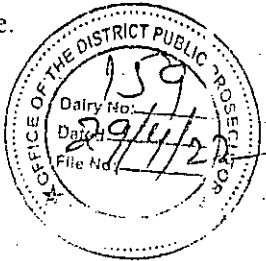
1. All Regional Director Prosecution
In Khyber Pakhtunkhwa
2. All District Public Prosecutors,
In Khyber Pakhtunkhwa.

Attention: All Assistant (BS-16) & Senior Clerk (BPS-14).

Subject: - FINAL SENIORITY LIST OF ASSISTANT (BS-16) & SENIOR CLERK (BPS-14).

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of "Final Seniority List" of the Assistant (BS-16) and Senior Clerk (BPS-14) working at the strength of Directorate of Prosecution. The same may be handed over to all the officials concerned working under your kind control for information and further necessary action, please.



Yours faithfully,

Deputy Director Administration

attested
[Signature]

Encl: (as above)

Copy forwarded for information to the:

1. PA to Director General Prosecution, Khyber Pakhtunkhwa.

Mr. Tariq (Super.) to inform all the concerned.

Deputy Director Administration

Noted
[Signature]
10/5/2022

[Signature]
29/4/2022 DPA

Not Assent
[Signature]

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FINAL SENIORITY LIST OF OFFICE ASSISTANT BPS-16, IN DIRECTORATE OF PROSECUTION PESHAWAR Khyber Pakhtunkhwa, 2022

	Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post			Present Posting
					Date	BS	Method of Recruitment	
1.	Muhammiad Hamayoon	B.A.	28/10/1967 Lakki Marwat	12-05-1994 Junior Clerk BS-05	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, orakzai
2.	Qamar Zaman	B.A.	20/01/1970 Tank	12-05-1994 Junior Clerk BS-05	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, south Waziristan
3.	Muslim Khan	Matric	07/01/1966 Charsadda	26-07-1994 Junior Clerk BS-05	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Peshawar
4.	Sikandar Hayat	Matric	15/11/1964 Dir Lower	15-08-1994 Junior Clerk BS-05	14-02-2020	16	Promotion	appointed as superintendent (bs-17) on acting charge basis office of the district public prosecutor, upper dir
5.	Muhammad Iqbal	B.Com	05/05/1970 Lakki Marwat	13-09-1989 Junior Clerk BS-05	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, Bannu
6.	Mumraiz Khan	Matric	01/04/1970 Peshawar	08-06-1988 Naib Qasid BS-01	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Khyber
7.	Shahid Gul	Matric	05/05/1963 Kohat	19-09-2000 Junior Clerk BS-05	27-05-2021	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis DPP Kurram.
8.	Shakeel Akhtar	Matric	15/03/1977 Nowshera	17-04-1994 Assistant BS-16	27-05-2021	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis DPP Mohammad
9.	Syed Ibrar Shah	Matric	1976 Manshra	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Torghar

attested by
[Signature]

14

S.NO	Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post Present Posting			Present post.
					Date	BPS	Method of recruitment/Promotion	
10.	Abdul Wahid	Matric	16/03/1972 Tank	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Tank
11.	Sakhawat Shah	B.A	10/04/1975 Buner	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Swat
12.	Muhammad Arshad	Matric	01/06/1977 Manshra	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, batagram
13.	Malik Rehmat Ali	Matric	04/04/1981 Feshwar	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Khyber
14.	Muhammad Yousaf	B.A	24/04/1964 Bannu	24-04-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Bannu
15.	Aurangzeb	Matric	01/03/1963 Dir Lower	17-08-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, DIR LOWER
16.	Ajmal Khan	Matric	24/11/1967 Swabi	03-12-1989 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWABI
17.	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Swabi
18.	Said Rehman	F.A	20/03/1974 Swat	26-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWAT
19.	Tariq Ahmad	Matric	03/04/1975 Swat	27-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, SWAT
20.	Syed Alam Shah	Matric	13/02/1974 Manshra	15-03-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Manshra
21.	Hazrat Muhammad	B.A.	01/01/1970 Malakand	23-07-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Malakand
22.	Jehan Alan	B.A.	07/03/1984 Shangla	12-04-2007 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Shangla
23.	Ismail Khan	B.A	10-11-1982 MALAKAND	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at Office of the District Public Prosecutor, Charsadda
24.	Raisul Ahrar Bacha	B.S (Zoology)	05-07-1994 SWAT	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at DIRECTORATE OF PROSECUTION
25.	Saba Gul	B.S(BOTANY)	16-01-1995 MARDAN	24-06-2019 Assistant BS-16	24-06-2019	16	Appointed through KPPSC	Assistant (BS-16) at DPP OFFICE Nowshera
26.	Muhammad Ali Shah	LL.B (Hons)	26-11-1989 Abbottabad	03-09-2019 Assistant BS-16	03-09-2019	16	Appointed through KPPSC	Assistant (BS-16) at District Public Prosecutor, Abbottabad

attested
 Muhammad Ali Shah
 District Public Prosecutor
 Charsadda

C, 15



DIRECTORATE OF PROSECUTION
GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

No. DP/
Dated Peshawar the 28/08/2023
Office Landline#091-9212559

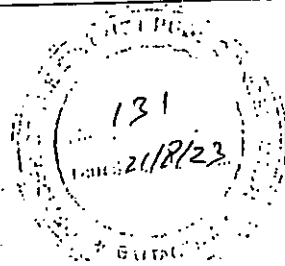
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ORDER

No. DP/E&A/ (COB) 10063-70 On the recommendation of the Departmental Promotion Committee (DPC) in its meeting held on 25-07-2023 and in supersession of this Directorate order No. DP/EA/1(100)952-75 dated: 11-02-2019, the Competent Authority has been pleased to promote/ appoint the following Senior Clerks (BPS-14) to the post of Assistant (BPS-16) on regular/ acting charge basis as per details given below:

1.	Mr. Shakeel Akhtar	On regular basis	11-02-2019 Meharand
2.	Mr. Syed Ibrar Shah	On regular basis	-do- Turghar
3.	Mr. Sakawat Shah	On acting charge basis	-do- Swat
4.	Mr. Muhammad Arshad	-do-	-do-
5.	Mr. Malik Reemat Ali	-do-	-do- Khyber
6.	Mr. Yaqoob Khan	-do-	-do-
7.	Mr. Khairullah an	-do-	-do-
8.	Mr. Fida Muhammad	-do-	-do-
9.	Mr. Muhammad Yousaf	-do-	-do- Banna
10.	Mr. Aurangzeb	-do-	-do- Dir lower

Attested
Sardar Muhammad
Azeem Advocate
High Court Abbottabad





DIRECTORATE OF PROSECUTION
GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT
No. DP/ _____
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Sl. No.	Name of Official	Status	With effect from
11.	Mr. Ajmal Khan	On acting charge basis	11-02-2019 Swabi
12.	Mr. Sahibzada	-do-	-do- Swabi
13.	Mr. Said Rehman	-do-	-do- Swabi
14.	Mr. Tariq Ahmad	-do-	-do- Chusaddi
15.	Mr. Syed Alam Shah	-do-	-do-
16.	Mr. Hazrat Muhammad	-do-	-do- D. I. Lower
17.	Mr. Jehan Alam	-do-	-do-


-Sd-

Director General Prosecution
(Directorate of Prosecution)
Khyber Pakhtunkhwa

Endst: of even No. dated:

Copy forwarded for information to the:

1. Accountant General office, Khyber Pakhtunkhwa Peshawar.
2. District Public Prosecutor offices concerned.
3. District Account offices concerned.
4. PS to Secretary to Government of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Peshawar.
5. Officials concerned.
6. PA to Director General, Khyber Pakhtunkhwa.
7. Establishment Section of this Directorate.


Director Administration

16

2023 Final

D

DIRECTORATE OF PROSECUTION
GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

No. DP/ E & A/ 1(66)/10204-46

Dated Peshawar the 10/08/2023

Office Landline#091-9212559

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To

1. All Regional Directors Prosecution,
Khyber Pakhtunkhwa.

2. All District Public Prosecutors,
Khyber Pakhtunkhwa.

Attention: Assistant, Computer Operator (BS-16), Senior Clerk (BPS-14),
Junior Clerk (BPS-11) and Class-IV (BS-03).

Subject: FINAL SENIORITY LIST OF ASSISTANT, COMPUTER
OPERATOR (BS-16), SENIOR CLERK (BPS-14), JUNIOR
CLERK (BPS-11) AND CLASS-IV (BS-03) OF THE
DIRECTORATE OF PROSECUTION.

Respected Sir,

I am directed to refer to the subject noted above and to enclose
herewith copy of "Final Seniority List" in respect of said Officials working at
the strength of Directorate of Prosecution. The same may be handed over to all
the Officials concerned working under your kind control for information and
further necessary action, please.

Yours faithfully,

Amir Shah

Assistant Director Administration

(Encl: as above)

Copy forwarded for information to the:

PA to Director General Prosecution, Khyber Pakhtunkhwa.

Amir Shah

Assistant Director Administration

*attested
Amir Shah*

17

**FINAL SENIORITY LIST OF OFFICE ASSISTANT (BPS-16) IN DIRECTORATE OF PROSECUTION
PESHAWAR KHYBER PAKHTUNKHWA AS STOOD ON 09-08-2023.**

S.NO	Name	Qualification	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Appointment/Promotion to Present Post			Present Posting
					Date	BPS	Method of Recruitment	
1.	Shakeel Akhtar	Matric	15-03-1977 Nowshera	17-04-1994 Assistant	27-05-2021	16	Promotion	Appointed as Superintendent (BPS-17) On Acting Charge Basis office of District Public Prosecutor, Mohammad
2.	Syed Ibrar Shah	Matric	01-07-1976 Mansehra	10-03-2003 Naib Qasid	11-02-2019	16	Promotion	Office of District Public Prosecutor, Torghar
3.	Abdul Wahid	Matric	16-03-1972 Tank	10-03-2003 Junior Clerk	11-02-2019	16	Promotion	Office of District Public Prosecutor, Tank
4.	Ismail Khan	B. A	10-01-1982 Bajaur	15-03-2019 Assistant	15-03-2019	16	Initial, Appointed through KPPSC	Office of District Public Prosecutor, Charsadda
5.	Raisul Ahrar Bacha	B.S (Zoology)	05-07-1994 Swat	15-03-2019 Assistant	15-03-2019	16	Initial, Appointed through KPPSC	Directorate of Prosecution
6.	Saba Gul	B.S (Botany)	16-01-1995 Mardan	24-06-2019 Assistant	24-06-2019	16	Initial, Appointed through KPPSC	Office of District Public Prosecutor Mardan and is on Ex-Pakistan Leave
7.	Muhammad Ali Shah	LLB (Hons)	26-11-1989 Abbottabad	03-09-2019 Assistant	03-09-2019	16	Initial, Appointed through KPPSC	Office of District Public Prosecutor Abbottabad
8.	Sadar Ayub	F. A	06-01-1985 Upper Kohistan	12-04-2007 Junior Clerk	20-01-2020	16	Promotion	Office of District Public Prosecutor Upper Kohistan
9.	Waheed Akhtar	D.COM	28-08-1987 Kohat	12-04-2007 Junior Clerk	20-01-2020	16	Promotion	Office of District Public Prosecutor, Kohat
10.	Fazle Rabi	Matric	10-01-1970 Peshawar	01-01-1992 Naib Qasid	20-01-2020	16	Promotion	Office of District Public Prosecutor, Peshawar

attested
[Signature]

18

FINAL SENIORITY LIST OF SENIOR CLERKS (BPS-14) IN DIRECTORATE OF PROSECUTION, KHYBER PAKHTUNKHWA AS STOOD ON 09-08-2023.

S. No	Name	Qualification	Date of Birth & Domicile	Date of first entry into service with designation & BPS	Present Posting
1.	Sakhawat Shah	B.A	10/04/1975 Buner	10-03-2003 Naib Qasid BPS-01	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swat
2.	Muhammad Arshad	Matric	01/06/1977 Mansehra	10-03-2003 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Battagram
3.	Malik Rehmat Ali	Matric	04/04/1981 Peshawar	10-03-2003 Naib Qasid BPS-01	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Khyber
4.	Muhammad Yousaf	B.A	24/04/1964 Bannu	24-04-1988 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Bannu
5.	Ajmal Khan	Matric	24/11/1967 Swabi	03-12-1989 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swabi
6.	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swabi
7.	Said Rehman	F.A	20/03/1974 Swat	26-02-1995 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swat
8.	Tariq Ahmad	Matric	03/04/1975 Swat	27-02-1995 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swat
9.	Syed Alam Shah	Matric	13/02/1974 Mansehra	15-03-1995 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Mansehra
10.	Muhammad	B.A	01/01/1970 Malakand	23-07-1995 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Malakand

Attested
[Signature]

خدمت میں سیکرٹری گورنمنٹ آف خیریتوں و اوائل کورڈینیشن اور
بذریعہ ڈائریکٹر جنرل Prosecution خیریتوں و اوائل

(19)

د

محکمہ ایدز و صحت اور امور صحت کے تحت 2023 میں جاری کیے گئے
Prosecution خیریتوں و اوائل کو وینیاٹی گسٹ سال 2023
جن کے تحت اپیلنٹ کی سیکس بن 16 اسٹیٹ کی پوسٹ
سے غیر قانونی طور پر ریگولیشن کے تحت چارج میں تبدیل کر دیا گیا۔

جنرل عالی :- ایدز و صحت

(1) یہ کہ اپیلنٹ کو مورخہ 11 فروری 2019 کو تحت قانون پاسی
کیس بن 14 سیکرٹری گورنمنٹ آف خیریتوں و اوائل کی پوسٹ سے اسٹیٹ کی پوسٹ میں
کی پوسٹ پر بعد از ڈی. پی. سی منٹوری ریگولیشن پر ترقی دی گئی
(2) یہ کہ سال 2021 اور سال 2022 میں اسٹیٹ کی پوسٹ
کی فائل بنائی گئی۔ جاری کی گئی ہیں یہ اپیلنٹ کا نام بطور ریگولر
اسٹیٹ ہو رہے۔

(3) یہ کہ اپیلنٹ نے تاریخ ترقی مورخہ 11 فروری 2019 سے لے کر ایک
باقاعدہ طور پر اسٹیٹ کی پوسٹ پر اپنے وائلنسہ انجام دیا ہے
اس طرح ترقی سے آدرس کے عمل سے اور اس ترقی سے آدرس کو Acting
چارج میں تبدیل کرنا نہ صرف قانونی ہے بلکہ بدنی میں اس کا سہارا ہے
دعا ہے کہ اپیلنٹ سے سزا سن کر دیگر ملازمین کو ترقی دی گئی ہے اور ان کی سروس نہ ہونے پر
رکھی بلکہ زمین ترقی میں دی جا رہی ہے

اسد خاصہ منٹوری ایدز و صحت کے تحت اسٹیٹ کی پوسٹ میں اسٹیٹ کی پوسٹ پر ترقی دی گئی ہے
اور وینیاٹی گسٹ کے تحت اسٹیٹ کی پوسٹ میں اسٹیٹ کی پوسٹ پر ترقی دی گئی ہے

مددگار اسٹیٹ کے تحت اسٹیٹ کی پوسٹ میں اسٹیٹ کی پوسٹ پر ترقی دی گئی ہے
Prosecutor

Attested
Sardar M. S. Mirza
Azeem A. Siv Oz-ate
High Court Abbottabad

20/F



DIRECTORATE OF PROSECUTION
GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

No.DP/ F 3 R 1 PF 1 11119-21
Dated Peshawar the 12/09/2023
Office Landline#091-9212559

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To,
The District Public Prosecutors,
Shangla, Battagram & Khyber.

Attention: M/s. Jehan Alam, Muhammad Arshad, Malik Rehmat Ali, Assistants.

Subject: REPRESENTATION REGARDING SENIORITY LIST OF ASSISTANT (BPS-16).

Respected Sir,

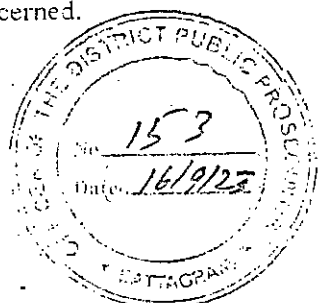
I am directed to refer to your letters No. 686 DPP (SH) Dated: 22-08-2023, 515 Dated: 22/08-2023 and 691/DPP Khyber Dated: 31-08-2023 on the subject and to state that the seniority list of Assistant (BPS-16) was issued in pursuance of Departmental Promotion Committee (DPC) meeting held in Home Department which is in accordance with law and no illegality has been found, therefore, their representations have been filed by the Competent Authority, please.

Yours faithfully,

Assistant Director Administration

Copy forwarded for information to the:

- 1. PA to Director General Prosecution, Khyber Pakhtunkhwa.
- 2. Officials concerned.



Assistant Director Administration

attested

Sardar Muhammad
Azeem Advocate
High Court Abbottabad

DISTRICT PUBLIC PROSECUTOR
Battagram

کورٹ فیس

وکالت نامہ (21)

بعدالت سید محمد شہباز

عنوان: مدد ارشد بنام سیکرٹری گورنمنٹ آف جسٹس گلشن واہ دفعہ

منجانب: ایڈووکیٹ

نوعیت مقدمہ: سروکل ایڈ

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

سردار محمد شہباز

کو وکیل مقرر کر کے اقرار کرنا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا تم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت ناش بصدیقہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المرقوم: 23/10/11

بمقام: سید محمد شہباز

Sardar Muhammad
Azeem Advocate
High Court Abbottabad