

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No. 1130/2023

Fazal Rabi APPELLANT

VERSUS

1. Govt of KPK through Secretary Forest KPk and others.


..... **RESPONDENTS**

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DATED: 08-01-2024

Respondent No. 4


Sadar Muhammad Saleem
DIVISIONAL FOREST OFFICER
HAZRA TRIBAL FOREST DIVISION
BATAGRAM

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10514

Dated 11-1-2024

Fazal Rabi

APPELLANT

VERSUS

Govt of KPK etc

RESPONDENTS

SERVICE APPEAL

PARAWISE COMMENTS ON BEHALF OF

RESPONDENTS NO.1 TO 4

Respectfully Sheweth: That the respondents submit as under:

PERLIMINARY OBJECTION:

- 1) That the appellant has got no cause of action against the respondents.
- 2) That the appellant is ^estopped to sue due to this conduct.
- 3) That the instant appeal is not maintainable in its present form.
- 4) That the appellant has not come to his Honorable Tribunal with clean hands.
- 5) That appellant has got no locus standi to file the instant appeal.
- 6) That the seniority list has been prepared accordance with the law and rules on the subject.

- 7) That the instant appeal is liable to be rejected with costs.
- 8) That the appeal is barred by law and limitation.

ON FACTS.

- 1. Pertains to record, hence need no comments.
- 2. In correct hence denied. As Forest Guard is a Forest Divisional cadre post, therefore, respondent No. 4 being appointing authority prepared seniority list of Forest Guard is accordance with law and rules on the subject. Specifically, section 8 (3) of the civil servant Rules 1973 and Rules-~~20~~17 (1) (a) of the Appointment Promotion and Transfer Rules-1989.
- 3. Departmental appeal was rightly rejected by the appellant authority as the same carried no legal weight, and devoid Rules.
- 4. In correct. The petitioner concealed the facts and quoted wrong precedents of other Forest Division regarding preparation of seniority lists. As reveals from the record the seniority list of Forest Guards always prepared according to Rules 17(1) (a) of the Appointment, Promotion and Transfer Rules-1989. Therefore, the plea of the petitioner regarding fixation of his seniority in light of Rules-17 (4) is not

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applicable. Rule-17 (4) is relate to seniority of Civil Servants in a certain cadre to which promotion is made from different lower posts earning the same pay scale from the date of regular Appointment Promotion of the Civil Servants in the lower post. (Annexed). Transfer Rules-1989 the specific rules is reproduced below.

"17. Seniority:- (1) The seniority inter se of civils servants (appointed to service cadre on post) shall be determined.

(a) In case of persons appointed by initial recruitment in accordance with the order of merit assigned by the commission or as the case may be the departmental selection committee. provided that persons selected for appointment to a post in earlier selection shall rank senior to the persons selected in a later selection! and." (Copy of Rule is annexed as Annexure "A".)

5. The petitioner treated according to rules hence this service appeal may kindly have dismissed on the following grounds.

ON GROUNDS: -

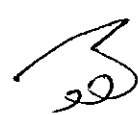
- a. Incorrect. As already explained in paras 2,3 & 4 of the facts the seniority list has been prepared in accordance with law and rules on the subject.
- b. In correct. As already explained in paras 2,3 & 4 of the facts hence no rights the present appellant has been infringed by the department.

c. In correct, As already explained in paras 2,3 & 4 of the facts.

Moreover

the Appointment, Promotion and Transfer Rules-1989 clearly provides for seniority of Civil Servants which reckons in accordance with the order of merit assigned by the commission or DSC as the case may be and not on the basis of age. Rule No 17 (4) has been misinterpreted by the petitioner. It is pertinent to mentioned here that after the initial recruitment Forest Guards vide office Order No. 19 dated 03.10.2016, final seniority list was prepared in the respect of Hazara Tribal Forest Division Battagram dated 14.12.2017 which was never challenged by the present appellant before any forum hence the instant appeal being devoid of any merits is liable to be dismissed. **(Copies of Final Merit list and seniority list of 2017 and 2023 are annexed as Annexure "B" & "C" respectively).**

d. Incorrect. As already explained in para 2,3 & 4 of the facts and para "C" of the grounds.



e. That the respondent also seek permission to the raise further point at the time Arguments.

f. Incorrect.

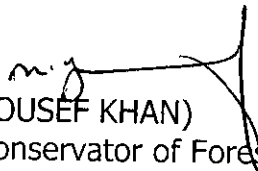
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PRAYER: -

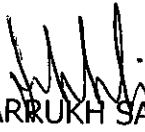
It is therefore, humbly prayed that the instant appeal may please be dismissed with cost, state-away being devoid the rules.




(SYED NAZAR HUSSAIN SHAH)
Secretary to Government of Khyber Pakhtunkhwa
Climate Change, Forestry, Environment and Wildlife Department
Peshawar



(M) (YOUSEF KHAN)
Chief Conservator of Forests,
Norther Forest region-II
Abbottabad



(FARRUKH SAIR)
Conservator of Forest
Upper Hazara Forest Circle
Mansehra



(SARDAR MUHAMMAD SALEEM)
Divisional Forest Officer
Hazara Tribal Forest Division Battagram

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BEFORE THE HONOURABLE SERVICES TRIBUNAL KPK, PESHAWAR

Appeal No.1130/23

Fazal Rabi

(Appellant)

Versus

1. Govt of KPK through secretary forest KPk and others

(Respondents)

AFFIDAVIT:

I, Mr. Sardar Muhammad Saleem Divisional Forest Officer do hereby solemnly affirm and declare on oath that the contents of the para -wise Comments are correct up to the best of my knowledge and nothing has been concealed from this honorable Tribunal.

Respondent No. 4



Sardar Muhammad Saleem
DIVISIONAL FOREST OFFICER
HAZRA TRIBAL FOREST DIVISION
BATAGRAM

ATTESTED



CHAPTER-2

Annexure - A
2 pages

Section-1**Statutory provision regarding Appointment.**

Section 5 of Civil Servants Act, 1973 - Appointment to a civil service of the Province or to a civil post in connection with the affairs of the Province shall be made in the prescribed manner by the Governor or by a person authorized by the Governor in that behalf.

The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

PART-I GENERAL

1. **Short title and commencement:-** (1) These rules may be called the Khyber Pakhtunkhwa (Appointment, Promotion, and Transfer) Rules, 1989.

(2) They shall come into force at once.

2. **Definitions :-** (1) in these rules, unless the context otherwise requires:-

(a) "Appointing Authority" in relation to a post, means the persons authorized under rule 4 to make appointment to that post;

(b) "Basic Pay Scale" means Basic Pay Scale for the time being sanctioned by Government, in which a post or a group of posts is placed;

(c) "Commission" means Khyber Pakhtunkhwa Public Service Commission.

(d) "Departmental Promotion Committee" means a committee constituted for making selection for promotion or transfer to such posts under a Department, or offices of Government, which do not fall within the purview of the Provincial Selection Board.

(e) "Departmental Selection Board" means a Board constituted for the purpose of making selection for initial recruitment /appointment to posts under a Department or office of Government in Basic Pay Scale 17 not falling within the purview of the Commission"

Provided that more than one such committees may be constituted for civil servants holding different scales of pay".

(e) "Departmental Selection Committee" means a committee constituted for the purpose of making selection for initial appointment to posts under a department, or office of Government {in Basic Pay Scale 17 and below not falling within the purview of the Commission}:

Attested
M. H.

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(3) In case no specific order of extension of probation period under sub-rule (2) is issued, on the expiry of one year within two months, the probation shall stand automatically terminated.

(4) In case of extension of probation period, through specific order for another year, under sub-rule (2), the probation shall stand automatically terminated on the completion of extended period. *Rule 15 Substituted vide No. SO (Policies) E & AD/1-3/2017 dated 07-12-2017

16. **Confirmation:**-After satisfactory completion of the probationary period, a civil servant shall be confirmed; provided that he holds a substantive post, provided further that a civil servant shall not be deemed to have satisfactorily completed his period of probation, if he has failed to pass an examination, test or course or has failed to complete successfully a training prescribed within the meaning of sub-section (3) of Section 6 of the Khyber Pakhtunkhwa Civil Servants Act, 1973.

PART-VI

SENIORITY

17. **Seniority :-**(1) The seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined:-

(a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission [or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and

(b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation. I:- If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely affect the interest of his seniors in fixation of his seniority in the higher post.

Explanation. II:- If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incomplete record or for any other reason not attributing to his fault or demerit.

Explanation. III:- A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

Attested
M. J.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-a-viz those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

(3)* In the event of merger/restructuring of the Departments, Attached Departments or Subordinate offices, the inter-se- seniority of the civil servants affected by the merger/ restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.

*Sub-Rule (3) of Rule 17 added vide No.SORI(E&A)/4-1/80(Vol.IV) Dated 28-5-2002

** (4) The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the lower post is the same, the civil servant older in age, shall be treated senior

** Sub-Rule (3) of Rule 17 added vide No.SORI(E&A)/1-3/2008 Dated 19-11-2009

*[The Secretary Establishment has been authorized to approve the issuance of the seniority lists of the members of service, cadre or posts for which the Chief Secretary KP is the appointing authority.] *No. SO(P) E&D/1-16/2011 Dated 7-12-2017

18. **General Rules:-** In all matters not expressly provided for in these rules, civil servants shall be governed by such rules as have been or may hereafter be prescribed by Government and made applicable to them.

19. **Repeal:-** The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, are hereby repealed.

Attested
M. J. [Signature]

Annexure-B
3 pages

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FINAL MERIT LIST OF SHORT LISTED CANDIDATES FOR INTERVIEW (RECURTMENT) OF FOREST GUARDS IN RESPECT OF HAZARA TRIBAL FOREST DIVISION BATTAGRAM HELD ON 17/10/2016.

| S.No. | Name & parentage home Address and CNIC Number | Date of Birth | Domicile | Physical Measurements | | | | Academic Record | | | | | Total NTS Marks (A+B+C+D) | Interview Marks to be awarded by (DSC) Total 08 marks | G. Total | Position |
|-------|--|---------------|-----------|-----------------------|-------------------|-----------------|---------|-----------------|-----------------|-----------------|-----------------|---------------------------------|---------------------------|---|----------|----------|
| | | | | Height (Inches) | Chest Size e- Min | Chest Size- Max | Running | Merit Score (A) | Merit Score (B) | Merit Score (C) | Merit Score (D) | Total ESTA code Aggregate marks | | | | |
| 1- | Saifullah S/O Rustam Khan of Banna CNIC# 13201-7733371-3 | 10.3.091 | Battagram | 67.9 | 35 | 37 | Ok | 35 | 35 | 6 | | 76 | 106 | 05 | 111 | |
| 2- | Tariq Aziz S/O Gulbar Khan of Btg CNIC# 13202-3531888-3 | 12.1.095 | Battagram | 68.1 | 35 | 36.5 | Ok | 35 | 35 | 6 | | 76 | 102.5 | 05 | 107.5 | |
| 3- | Shahid Akbar S/O Muhammad Aseem of Battagram CNIC# 13202-3596427-1 | 31.1.092 | Battagram | 67.2 | 35 | 36.5 | Ok | 35 | 35 | 0 | 8 | 78 | 98 | 05 | 103 | |
| 4- | Sheryar Khan Niazi S/O Niaz Muhammad Khan Niazi of Batamori CNIC# 13202-4763480-1 | 5.4.093 | Battagram | 66.5 | 35.5 | 37 | Ok | 35 | 35 | 6 | | 76 | 97 | 05 | 102 | |
| 5- | Syed Hammad Ali Shah S/O Syed Amir Afsar Shah of Biland Kot CNIC# 13202-0581548-9 | 12.4.089 | Battagram | 66.8 | 34.5 | 36 | Ok | 35 | 35 | 6 | | 76 | 95 | 05 | 100 | |
| 6- | Farman ullah S/O Umer Sharif of Chiran Rabat Kanwo Allai CNIC# 13201-2088078-3 | 1.1.094 | Battagram | 68.5 | 35 | 36.5 | Ok | 35 | 35 | 6 | | 76 | 94 | 05 | 99 | |
| 7- | Wahid S/O Muhammad Waheed of Jso Bazar CNIC# 13202-9602721-5 | 14.3.094 | Battagram | 67 | 36 | 38 | Ok | 35 | 35 | 0 | | 70 | 91 | 05 | 96 | |
| 8- | Naeem ul Hadi S/O Muhammad IRshad of Battagram CNIC# 13202-4820518-9 | 12.12.092 | Battagram | 66 | 34 | 35.5 | Ok | 26 | 35 | 6 | | 67 | 90.5 | 05 | 95.5 | |
| 9- | Atta ullah S/O Aurngzeb of Phagora CNIC# 13202-6359050-7 | 7.3.089 | Battagram | 71.3 | 34.5 | 36 | Ok | 35 | 27 | 0 | 8 | 70 | 89 | 05 | 94 | |

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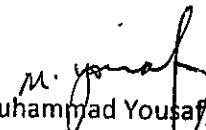
| | | | | | | | | | | | | | | | | |
|-----|--|-----------|-----------|------|------|------|----|----|----|---|---|----|------|--------|------|--|
| 10- | Ahmad Saeed Khan S/O Muhammad Parviaz Khan of Saddeen Mera CNIC# 13202-8787983-3 | 10.3.096 | Battagram | 66.5 | 34 | 36 | Ok | 35 | 35 | 0 | | 70 | 88 | 05 | 93 | |
| 11- | Muhammad Saeed S/O Ghulam Ghous of Shamlai CNIC# 13202-3268062-3 | 13.8.96 | Battagram | 67 | 34 | 36 | Ok | 35 | 27 | 0 | | 62 | 87.5 | 05 | 92.5 | |
| 12- | Fazal Rabi S/O Faqeer Muhammad of Jambira CNIC# 13201-3318900-3 | 11.11.090 | Battagram | 69.6 | 42 | 43.5 | Ok | 35 | 27 | 6 | | 68 | 87 | 05 | 92 | |
| 13- | Noshad Khan S/O Aurangzeb Khan of officer Colony Mirpoor Abbottabad CNIC# 13202-2943373-1 | 27.12.088 | Battagram | 69 | 34 | 35.5 | Ok | 35 | 27 | 0 | 8 | 70 | 87 | 05 | 92 | |
| 14- | Qazi Izhar ul Haq S/O Qazi Adress of Battagram CNIC# 13202-3806277-1 | 1.10.091 | Battagram | 66 | 36 | 38 | Ok | 35 | 27 | 0 | 8 | 70 | 86 | 05 | 91 | |
| 15- | Faiz ur Rehman S/O Fazal ur Rehman of Rabat Kandwo Allai CNIC# 13201-3424353-5 | 2.3.094 | Battagram | 70 | 35 | 36.5 | Ok | 26 | 35 | 6 | | 67 | 86 | 05 | 91 | |
| 16- | Nisar Ahmad S/O Zahir Muhammad of Roopkani Allai CNIC# 13201-6847627-3 | 26.2.095 | Battagram | 66.9 | 34 | 35.5 | Ok | 35 | 27 | 0 | | 62 | 85.5 | 05 | 90.5 | |
| 17- | Tariq Aziz S/O Jamshed Khan of Kani Allai CNIC# 13201-5408446-9 | 1.4.094 | Battagram | 70 | 34 | 35.5 | Ok | 35 | 35 | 0 | | 70 | 85.5 | Absent | 85.5 | |
| 18- | Wali ullah S/O Ghulam Muhammad of Battagram CNIC# 13202-2748333-5 | 8.5.094 | Battagram | 70.1 | 34 | 35.5 | Ok | 35 | 35 | 0 | | 70 | 85.5 | 05 | 90.5 | |
| 19- | Muhammad Tasleem S/O Sardar of Neeli Shang CNIC# 13202-0373008-7 | 1.4.93 | Battagram | 71.8 | 35.5 | 38 | Ok | 35 | 35 | 0 | | 70 | 84.5 | 05 | 89.5 | |
| 20- | Sharif ullah S/O Hayyullah of Kund Besham CNIC# 13201-0918552-5 | 17.5.091 | Battagram | 66 | 37 | 38.5 | Ok | 26 | 27 | 6 | | 59 | 83.5 | 05 | 88.5 | |


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|-----|--|-----------|-----------|------|------|------|----|----|----|---|--|----|------|----|------|--|
| 21- | Iftikhar Ahmad S/O Gul Namrooz Khan of Gijbori CNIC# 13202-68771591-7 | 1.4.094 | Battagram | 66 | 34 | 36 | Ok | 35 | 27 | 6 | | 68 | 83 | 05 | 88 | |
| 22- | Ikram ul Haq S/O Anwal ul Haq of Kakarshang CNIC# 13202-9474273-9 | 15.5.091 | Battagram | 67.9 | 35 | 36.5 | Ok | 26 | 27 | 6 | | 59 | 81.5 | 05 | 86.5 | |
| 23- | Ahmad S/O Shah Alam Khan of Bansir CNIC# 13202-5913187-1 | 30.12.091 | Battagram | 70.3 | 36 | 38 | Ok | 26 | 27 | 6 | | 59 | 81.5 | 05 | 86.5 | |
| 24- | Syed Sadam Hussain Shah S/O Syed Murtaza Shah of Biland Kot CNIC# 13202-6126802-7 | 14.3.092 | Battagram | 67.5 | 34 | 36 | Ok | 35 | 27 | 0 | | 62 | 81 | 05 | 86 | |
| 25- | Ibrar Khan S/O Muhammad Zubair of Batamori CNIC# 13202-7108723-9 | 15.10.090 | Battagram | 68 | 40.5 | 42 | Ok | 26 | 27 | 6 | | 59 | 80 | 05 | 85 | |

Note: seniority in the merit list prepared by NTS has been corrected at S.No. 13,14,17 and 18 in accordance to rules


(Muhammad Yousaf)
Divisional Forest Officer P/Squad
Representative of SO(Estt)
Govt of KPK FE&W Department
Member


Mr. Zafar Ali Khan
Divisional Forest Officer
Hazara Tribal Forest Division
(Chairman)


(Muhammad Muzaffar)
Sub Divisional Forest Officer
Battagram Forest Sub Division
Battagram
Member

Attested


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Annexure - C (13)
6 Pages

SENIORITY LIST OF FOREST GUARD AS IT STOOD ON 14/12/2017 IN RESPECT OF HAZARA TRIBAL FOREST DIVISION BATTAGRAM

| S.No | Name of Forest Guard | Father's Name | Home District | Qualification | Trained/un-trained | Date of Birth | Date of appointment/ Initial recruitment In Govt. Service | Present Grade | Remarks |
|------|----------------------|---------------------|---------------|---------------|--------------------|---------------|---|---------------|--|
| 1- | Gazal Rahim | Fakus | Battagram | Middle | -do- | 22-03-1960 | 17-03-1979 | 08 | - |
| 2- | Ahmed Rizvan | Abdul Mannan | Battagram | Middle | -do- | 11-12-1959 | 02-04-1983 | 08 | - |
| 3- | Saeed-ur-Rehman | Ghulam Sarwar | Battagram | Middle | -do- | 03-04-1961 | 13-06-1983 | 08 | - |
| 4- | Freen-ur-Rohman | Gul Samar | Battagram | Middle | -do- | 05-01-1963 | 13-06-1983 | 08 | - |
| 5- | Abeedullah | Wazir Ahmed | Battagram | Middle | -do- | 10-12-1963 | 09-08-1983 | 08 | - |
| 6- | Jumaraz | Gul Satbar | Battagram | Middle | -do- | 15-03-1965 | 25-08-1983 | 08 | - |
| 7- | Zafar Ali Kher | Rustam Khan | Battagram | Matric | -do- | 13-04-1965 | 01-10-1983 | 08 | - |
| 8- | Sherin Khan | Haroon Khan | Battagram | Matric | -do- | 08-10-1960 | 03-10-1983 | 08 | - |
| 9- | Taza Gul | Sharab Khan | Battagram | Middle | -do- | 01-01-1959 | 21-12-1983 | 08 | - |
| 10- | Mohammad Wakcel | Abdul Kahim | Battagram | Matric | -do- | 25-11-1959 | 22-02-1984 | 08 | - |
| 11- | Zarfareen | Jalundar | Battagram | Matric | -do- | 09-10-1960 | 23-02-1984 | 08 | - |
| 12- | Mohammad Afzal | Jumaraz Khan | Battagram | Matric | -do- | 01-01-1965 | 23-02-1984 | 08 | - |
| 13- | Dilbar Mohammad | Faiz Khan | Mansehra | Matric | -do- | 04-04-1965 | 23-02-1984 | 08 | - |
| 14- | Dilbar Khan | Ayyub Khan | Battagram | Matric | -do- | 08-04-1965 | 02-05-1984 | 08 | - |
| 15- | Shah Nawaz | Faqir Mohammad | Mansehra | Matric | -do- | 02-05-1960 | 14-04-1985 | 08 | Transferred from W/Shed and reported arrival on 24-09-1986 |
| 16- | Said Hassan Shah | Noor Nabi Shah | Battagram | Matric | -do- | 01-01-1962 | 07-12-1989 | 08 | - |
| 17- | Mohammad Anwar | Faiz ullah | Battagram | Matric | -do- | 07-01-1966 | 07-12-1989 | 08 | - |
| 18- | Obaidullah | Mohammad Zareen | Battagram | Matric | -do- | 08-03-1967 | 09-12-1989 | 08 | - |
| 19- | Akhtar Javed | Sarfraz Khan | Battagram | F.A | -do- | 05-05-1967 | 07-12-1989 | 08 | - |
| 20- | Faleh Mohammad Khan | Mohammad Khan | Battagram | Matric | -do- | 01-01-1962 | 09-07-1981 | 08 | Transferred from W/Shed and reported arrival on 19-02-1991 |
| 21- | Mohammad Pervez | Abdullah Jan | Battagram | Matric | -do- | 03-03-1963 | 16-07-1985 | 08 | Transferred form W/Shed and reported arrival on 07-06-1993 |
| 22- | Mohammad Iqbal | Mohammad Mafook | Battagram | Matric | -do- | 01-01-1975 | 09-11-1993 | 08 | - |
| 23- | Nisar Mohammad | Mohammad Ilyas Khan | Battagram | B.A | -do- | 18-04-1976 | 26-07-1994 | 08 | - |
| 24- | Shams-ud-Din | Mohammad Maskeen | Mansehra | Middle | -do- | 01-01-1961 | 03-01-1979 | 08 | Transferred from W/Shed and reported arrival on 20/11/2002 |
| 25- | Tayyab Shah | Noor Nabi Shah | Battagram | Matric | -do- | 04-04-1983 | 20-03-2007 | 08 | - |

M. ~~Shah~~
Attested

| | | | | | | | | | |
|-----|-----------------------|--------------------------|------------|--------|------------|------------|------------|----|--|
| 26- | Atta -ur- Rehman | Attai Khan | Battagram | Matric | -do- | 12-03-1968 | 07-11-2008 | 08 | - |
| 27- | Saif -ur- Rehman | Mir Ahmed | Abbottabad | Matric | -do- | 10-06-1965 | 20-11-1984 | 08 | - |
| 28- | Asif Nawaz | Sherin | Battagram | Matric | -do- | 10-04-1987 | 30-04-2009 | 08 | Joined HTFD, on 08/4/2009. |
| 29- | Jamshaid | Muhammad Farid Khan | Battagram | Middle | -do- | 11-11-1961 | 09-01-1984 | 08 | - |
| 30- | Sardar Ali Shah | Said Malook Shah | Battagram | Matric | -do- | 01-03-1975 | 26-11-2012 | 08 | Transferred from Agror Tanawal Forest Division Manshera reported arrival on 18/06/2010 |
| 31- | Abu Hanif | Ghulam Dawood | Battagram | FSC | -do- | 26-06-1990 | 10-10-2013 | 08 | - |
| 32- | Rustam Khan | Janaser | Battagram | Matric | -do- | 20-02-1969 | 30-01-2014 | 08 | - |
| 33- | Ibrar Hussain Shah | Hussan Nawab Shah | Battagram | Matric | -do- | 01-04-1976 | 29-02-1996 | 08 | Joined HTFD on 20/08/2013 and not yet completed the lien of 3 years |
| 34- | Saifullah | Rustam Khan | Battagram | B.A | Un trained | 10-03-1991 | 07-11-2016 | 08 | - |
| 35- | Tariq Aziz | Gulbar Khan | Battagram | BSc | -do- | 12-01-1995 | 07-11-2016 | 08 | - |
| 36- | Shahid Akbar | Muhammad Aseem | Battagram | M.A | -do- | 31-01-1992 | 07-11-2016 | 08 | - |
| 37- | Sheryar Khan Niazi | Niaz Muhammad Khan Niazi | Battagram | BSc | -do- | 05-04-1993 | 07-11-2016 | 08 | - |
| 38- | Syed Harunad Ali Shah | Syed Amir Afsar Shahi | Battagram | B.Com. | -do- | 12-04-1989 | 07-11-2016 | 08 | - |
| 39- | Farmanullah | Umer Sharif | Battagram | BSc | -do- | 01-01-1994 | 07-11-2016 | 08 | - |
| 40- | Naveed | Muhammad Waheed | Battagram | FSc | -do- | 14-03-1994 | 07-11-2016 | 08 | - |
| 41- | Naeem ul Hadi | Muhammad Irshad | Battagram | M.A | -do- | 12-12-1992 | 07-11-2016 | 08 | - |
| 42- | Attaullah | Aurangzeb | Battagram | M.A | -do- | 07-03-1989 | 07-11-2016 | 08 | - |
| 43- | Ahmed Saeed Khan | Muhammad Parviaz Khan | Battagram | DAE | -do- | 10-03-1996 | 07-11-2017 | 08 | - |
| 44- | Muhammad Saeed Khan | Ghulam Ghous | Battagram | HSSC | -do- | 13-08-1996 | 07-11-2016 | 08 | - |
| 45- | Fazal Rabi | Faqeer Muhammad | Battagram | M.A | -do- | 11-11-1990 | 07-11-2016 | 08 | - |
| 46- | Noshad Zaib Khan | Aurangzeb Khan | Battagram | M.A | -do- | 27-12-1988 | 07-11-2016 | 08 | - |
| 47- | Qazi Izhar ul Haq | Qazi Adress | Battagram | M.A | -do- | 01-10-1991 | 07-11-2016 | 08 | - |
| 48- | Faiz-ur-Rehman | Fazal ul Rehman | Battagram | BSc | -do- | 02-03-1994 | 06-12-2016 | 08 | - |
| 49- | Zeenat ullah | Said Fareen | Battagram | M.A | -do- | 20-12-1992 | 20-11-2017 | 08 | - |

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|-----|---------------|---------------|-----------|------|-----|------------|------------|----|---|
| 50- | Ikramullah | Noor Hussain | Battagram | HSSC | -d- | 26-01-1997 | 20-11-2017 | 08 | - |
| 51- | Sharifullah | Hayyullah | Battagram | M.A | -d- | 17-05-1991 | 20-11-2017 | 08 | - |
| 52- | Tariq Kamal | Mustafa Kamal | Battagram | B.A | -d- | 05-01-1990 | 20-11-2017 | 08 | - |
| 53- | Shehzad Ahmad | Sharab Khan | Battagram | FSc | -d- | 19-10-1995 | 20-11-2017 | 08 | - |

No 3284-80 /GE. dated 14/12/2017

Copy forwarded to the:-

- 1- Conservator of Forests, Upper Hazara Forest Circle Mansehra for information.
- 2- All SDFOs//RO in Hazara Tribal Forest Division for information & necessary action. They are directed to circulate the Seniority list among the Forest Guards of their Jurisdiction for scrutiny and direct them to furnish their observation, if any within one week from the receipt of seniority list to this official for further course of action.

[Signature]
 DIVISIONAL FOREST OFFICER
 HAZARA TRIBAL FOREST DIVISION
 BATTAGRAM

Divisional Forest Officer
 Hazara Tribal Forest Division
 Battagram

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They will be governed by the rules with initial
 attendance etc as they belong to the rules with initial

FINAL SENIORITY LIST OF FOREST GUARD AS IT STOOD ON 31/03/2023 IN RESPECT OF HAZARA TRIBAL FOREST DIVISION BATTAGRM

| S.No | Name of Forest Guard | Father's Name | Home District | Qualification | Trained/un-trained | Date of Birth | Date of appointment/ initial recruitment In Govt: Service | Present Grade | Remarks |
|------|----------------------|--------------------------|---------------|---------------|--------------------|---------------|---|---------------|---------|
| 1 | Sardar Ali Shah | Said Malook Shah | Battagram | Matric | -do- | 01-03-1975 | 26-11-2012 | 08 | - |
| 2 | Abu Hanif | Ghulam Dawood | Battagram | FSC | -do- | 26-06-1990 | 10-10-2013 | 08 | - |
| 3 | Rustam Khan | Janaser | Battagram | Matric | Un-Trained | 20-02-1969 | 30-01-2014 | 08 | - |
| 4 | Saifullah | Rustam Khan | Battagram | M.A | Trained | 10-03-1991 | | | |
| 5 | Tariq Aziz | Gulbar Khan | Battagram | BSc | Trained | 12-01-1995 | 07-11-2016 | 08 | - |
| 6 | Shahid Akbar | Muhammad Aseem | Battagram | M.A | Un-Trained | 31-01-1992 | 07-11-2016 | 08 | - |
| 7 | Sheryar Khan Niazi | Niaz Muhammad Khan Niazi | Battagram | BSc | -do- | 05-04-1993 | 07-11-2016 | 08 | - |
| 8 | Syed Hammad Ali Shah | Syed Amir Afsar Shah | Battagram | B.Com | Trained | 12-04-1989 | 07-11-2016 | 08 | - |
| 9 | Farmanullah | Umer Sharif | Battagram | BSc | Un-Trained | 01-01-1994 | 07-11-2016 | 08 | - |
| 10 | Naeem ul Hadi | Muhammad Irshad | Battagram | M.A | -do- | 12-12-1992 | 07-11-2016 | 08 | - |
| 11 | Attaullah | Aurangzeb | Battagram | M.A | -do- | 07-03-1989 | 07-11-2016 | 08 | - |
| 12 | Ahmed Saeed Khan | Muhammad Parviaz Khan | Battagram | DAE | -do- | 10-03-1996 | 07-11-2016 | 08 | - |
| 13 | Muhammad Saeed Khan | Ghulam Ghous | Battagram | HSSC | -do- | 13-08-1996 | 07-11-2016 | 08 | - |
| 14 | Fazal Rabi | Faqeer Muhammad | Battagram | M.A | -do- | 11-11-1990 | 07-11-2016 | 08 | - |
| 15 | Noshad Zaib Khan | Aurangzeb Khan | Battagram | M.A | -do- | 27-12-1988 | 07-11-2016 | 08 | - |
| 16 | Faiz-ur-Rehman | Fazal ul Rehman | Battagram | BSc | -do- | 02-03-1994 | 06-12-2016 | 08 | - |
| 17 | Ikramullah | Noor Hussain | Battagram | HSSC | -do- | 26-01-1997 | 20-11-2017 | 08 | - |
| 18 | Sharifullah | Hayyullah | Battagram | M.A | -do- | 17-05-1991 | 20-11-2017 | 08 | - |
| 19 | Tariq Kamal | Mustafa Kamal | Battagram | B.A | -do- | 05-01-1990 | 20-11-2017 | 08 | - |
| 20 | Shehzad Ahmad | Sharab Khan | Battagram | FSc | -do- | 19-10-1995 | 20-11-2017 | 08 | - |
| 21 | Rizwanullah | Bara Khan | Battagram | B.A | -do- | 01-01-1995 | 01-03-2019 | 08 | - |

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|----|--------------------------|----------------------|-----------|-----|---------|------------|------------|----|---|
| 22 | Muhammad Zubair | Saleem Khan | Battagram | BS | Trained | 15-03-1993 | 04-03-2019 | 08 | - |
| 23 | Bilal Mirza | Mirza Khan | Battagram | MSc | -do- | 26-01-1995 | 31-12-2018 | 08 | - |
| 24 | Salah-ud-Din | Sarbiland Khan | Battagram | B.A | -do- | 02-02-1999 | 05-10-2021 | 08 | - |
| 25 | Tariq Ahmad | Ghulam Haqani | Battagram | B.A | -do- | 10-10-1993 | 05-10-2021 | 08 | - |
| 26 | Shahbaz Khan | Jan Muhammad | Battagram | B.A | -do- | 01-01-1996 | 05-10-2021 | 08 | - |
| 27 | Irfan ullah | Rahim Khan | Battagram | FSc | -do- | 12-03-2000 | 05-10-2021 | 08 | - |
| 28 | Ameer Saeed | Saeed Akhtar | Battagram | FSc | -do- | 04-10-2000 | 05-10-2021 | 08 | - |
| 29 | Muhammad Fawad | Muhajarin | Battagram | FSc | -do- | 20-05-1999 | 05-10-2021 | 08 | - |
| 30 | Abdullah | Umar Khan | Battagram | FSc | -do- | 25-07-1997 | 05-10-2021 | 08 | - |
| 31 | Ejaz Ahmad | Umar Ghani | Battagram | FSc | -do- | 04-03-2000 | 05-10-2021 | 08 | - |
| 32 | Hamid Ali Shah | Muhammad Zahir Shah | Battagram | FSc | -do- | 20-05-1998 | 05-10-2021 | 08 | - |
| 33 | Imran Shah | Mian Afsar Shah | Battagram | FSc | -do- | 08-10-1997 | 05-10-2021 | 08 | - |
| 34 | Sohail Khan | Banaras Khan | Battagram | FSc | -do- | 25-06-1998 | 05-10-2021 | 08 | - |
| 35 | Behrullah | Faiz-ur-Rehman | Battagram | FSc | -do- | 05-08-1994 | 05-10-2021 | 08 | - |
| 36 | Shah Fahad Muhammad Khan | Taj Muhammad Khan | Battagram | M.A | -do- | 10-05-1992 | 10-06-2022 | 08 | - |
| 37 | Ghani Rahman | Abdul Qayum | Battagram | FSc | -do- | 03-01-1998 | 10-06-2022 | 08 | - |
| 38 | Abdur Rahman | Riaz | Battagram | FSc | -do- | 02-02-1997 | 10-06-2022 | 08 | - |
| 39 | Ubaid Ullah | Usman Zareen | Battagram | FSc | -do- | 04-01-1994 | 10-06-2022 | 08 | - |
| 40 | Muhammad Arsalan | Muhammad Naeem | Battagram | FSc | -do- | 05-02-2000 | 10-06-2022 | 08 | - |
| 41 | Muhammad Usman | Husnus Sawab | Battagram | FSc | -do- | 11-03-2002 | 10-06-2022 | 08 | - |
| 42 | Azmat Shuaib | Muhammad Shuaib Khan | Battagram | FSc | -do- | 18-12-1997 | 10-06-2022 | 08 | - |
| 43 | Muhammad Riaz | Mukhtiyar Muhammad | Battagram | FSc | -do- | 30-07-1998 | 10-06-2022 | 08 | - |
| 44 | Junaid Shoaib | Muhammad Shoaib | Battagram | FSc | -do- | 23-08-1998 | 10-06-2022 | 08 | - |
| 45 | Muhammad Zakir | Sharif ullah | Battagram | FSc | -do- | 15-08-2022 | 10-06-2022 | 08 | - |
| 46 | Saeedullah | Muhammad Alam | Battagram | FSc | -do- | 20-05-2000 | 10-06-2022 | 08 | - |
| 47 | Rooh Ullah | Hafeez Ullah | Battagram | FSc | -do- | 04-06-2002 | 10-06-2022 | 08 | - |
| 48 | Imran Khan | Taj Muhammad | Battagram | FSc | -do- | 25-01-2001 | 10-06-2022 | 08 | - |
| 49 | Adil Anwar | Aimal Khan | Battagram | FSc | -do- | 05-03-2002 | 10-06-2022 | 08 | - |
| 50 | Usama Naz | Naz Muhammad | Battagram | FSc | -do- | 08-08-1999 | 10-06-2022 | 08 | - |

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|----|--------------------------|------------------|-----------|-----|------|------------|------------|----|---|
| 51 | Izaz Ur Rehman | Ahsan Ur Rehman | Battagram | FSc | -do- | 13-08-2000 | 10-06-2022 | 08 | - |
| 52 | Abubakar Siddique | Ghulam Yousaf | Battagram | FSc | -do- | 01-04-1999 | 10-06-2022 | 08 | - |
| 53 | Abid Hussain | Khista Jan | Battagram | M.A | -do- | 27-08-1995 | 10-06-2022 | 08 | - |
| 54 | Syed Sajjad Hussain Shah | Abdul Tawab Said | Battagram | FSc | -do- | 15-03-1997 | 10-06-2022 | 08 | - |
| 55 | Toqeer Saraj | Muhammad Saraj | Battagram | FSc | -do- | 27-01-1994 | 10-06-2022 | 08 | - |

No 3284-85/GE, dated 31/03/2023

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- 2- All SDFOs//RO in Hazara Tribal Forest Division for information & necessary action.


DIVISIONAL FOREST OFFICER
HAZARA TRIBAL FOREST DIVISION
BATTAGRAM

Attested
M. J. S.

AUTHORITY LETTER

Mr. Muhammad Zakir Khan Sub-Divisional Forest Officer of Hazar Tribale Forest Division Battagram is authorized to attend the Khyber Pakhtunkhwa service tribunal and submit the para-wise comments furnished by the respondents in service Appeal No. 1130/23 before the honorable Service Tribunal Khyber Pakhtunkhwa Peshawar on behalf of the Undersigned.

Respondent No. 4



**Sadar Muhammad Saleem
DIVISIONAL FOREST OFFICER
HAZRA TRIBAL FOREST DIVISION
BATAGRAM**