

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No. 2498/2023

Feroz Khan

Versus

Law Department

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Respondent No. 02



Ghulam Ali

Director General, Law & Human Rights

*Cost Submitted (1000) STIP  
Attached with reply respondent  
no number - 01*

*18-04-24*

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 12268

Dated 18.04.2024

Service Appeal No. 2498/2023

Feroz Khan ..... Appellant

VERSUS

1. The Secretary to Government of Khyber Pakhtunkhwa Law, Parliamentary Affairs and Human Rights Department.
2. The Director General law and Human Rights Khyber Pakhtunkhwa ..... Respondents

REPLY ON BEHALF OF RESPONDENT NO. 02

Respectfully Sheweth

PRELIMINARY OBJECTIONS

1. That the appellant has got no cause of action or Locus Standi to file the instant appeal.
2. That the appellant has not come to the court with clean hands.
3. That the appellant has concealed material facts from this honourable Court.
4. The instant appeal is not maintainable in its present form.
5. That the instant appeal is barred by law.
6. That the appeal is not maintainable due to non-joinder of necessary parties.

ON FACTS

1. Para No. 1 pertains to record.
2. Para No. 2 pertains to record.
3. Para No. 3 pertains to record.
4. Para No. 4 pertains to record.
5. Para 5 is correct to the extent that the petitioner withdrew his Service Appeal 1816/2022 after the Seniority List of Naib Qasids was issued in 2022 by the Directorate General.
6. Para No. 6 is incorrect and subject to proof.

7. Para No. 7 pertains to record.
8. Para No. 8 pertains to record.
9. Para No. 9 pertains to record.
10. Para No. 10 is incorrect. No departmental appeal was received from the Appellant.
11. Para No. 11 is incorrect. The appellant has got no cause of action to file the instant appeal.

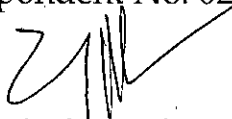
### GROUND

- A. Incorrect. The action and inaction of the respondent was according to law, facts and material on record hence liable to be upheld.
- B. Incorrect. The appellant has been treated by the respondent department in accordance with law and rules on the subject.
- C. Incorrect. The appellant was not discriminated rather treated according to the laid down policy.
- D. Incorrect. The appellant will be promoted on his turn.
- E. Incorrect. The respondent has not violated rule 17 of the APT Rules.
- F. That the respondent seek permission to raise additional grounds at the time of arguments.

### PRAYER

It is, therefore, most humbly prayed that the instant appeal may very graciously be dismissed.

Respondent No. 02

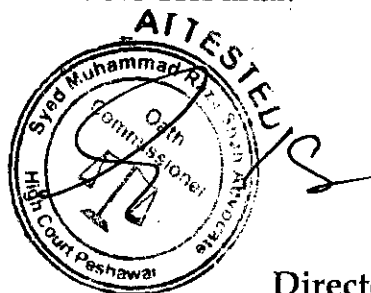


Ghulam Ali

Director General, Law & Human Rights

### AFFIDAVIT

I do hereby solemnly affirm that the contents of this reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.



DEPONENT



Ghulam Ali

Director General, Law & Human Rights



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**DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA, PESHAWAR**

Phone: 091-9217204

Email: [dhr.kpk@gmail.com](mailto: dhr.kpk@gmail.com)

Website: [www.humanrights.kp.gov.pk](http://www.humanrights.kp.gov.pk)

Plot No. 21, Sector B-2, Phase-V, Hayatabad, Peshawar

No: DG/SLT/AD/Promotion/2-16/2019

Dated: 02/12/2020

To

1. The Additional Secretary General,  
Law, Parliamentary Affairs & Human Rights  
Department Khyber Pakhtunkhwa.
2. Deputy Director (Admin),  
Directorate General of Law and Human Rights  
Khyber Pakhtunkhwa.

Subject:

**DEPARTMENTAL PROMOTION COMMITTEE (DPC) MEETING.**

Dear Sir,

I am directed to refer to the subject noted above and to state that the DPC meeting is scheduled to be held on 07/12/2020 at 11:00 AM under the Chairmanship of Director General of Law and Human Rights. The said meeting will be held at the office of Director General of Law and Human Rights. Working paper for meeting is enclosed.

You are, therefore requested to make it convenient to attend the said meeting on the above mentioned date, time and venue, please.

Yours faithfully

*(Handwritten Signature)*  
(NAVEEDA NAZ)  
Assistant Solicitor (M&E)

Endst: No. and date even.

Copy forwarded for information to:

1. PS to Secretary Law, Parliamentary Affairs and Human Rights Department Khyber Pakhtunkhwa.
2. PS to Director General of Law and Human Rights.
3. Master file.

*(Handwritten Signature)*  
(NAVEEDA NAZ)  
Assistant Solicitor (M&E)

Attested -  
*(Handwritten Signature)*  
Assistant Director.  
DG Law & Human Rights.



**DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA, PESHAWAR**

Phone: 091-9217204

Email: [dir.kpk@gmail.com](mailto:dir.kpk@gmail.com)

Website: [www.humanrights.kp.gov.pk](http://www.humanrights.kp.gov.pk)

Plot No. 21, Sector B-2, Phase-V, Hayatabad, Peshawar.

Dated Peshawar, the 02/12/2020

**OFFICE ORDER:-**

The competent authority has been pleased to constitute the following Departmental Promotion Committee for making recommendation for appointment by promotion and to assess the fitness/suitability of officials for promotion from (BPS-03) to (BPS-16):-

1. Dr. Asad Ali Khan  
(Director General for Law & Human Rights). Chairman
2. Mr. Noor Ali Khan  
(Deputy Director (Admn), O/o Directorate  
General of Law & Human Rights). Member
3. Representative from Law, Parliamentary Affairs  
& Human Rights Department.  
(not below the rank of BPS-17) Member
4. Mrs. Naveeda Naz  
(Assistant Solicitor, O/o Directorate General of  
Law & Human Rights). Secretary

-SD-

**Director General  
Law & Human Rights.**

**REF: DG/SLT/AD/Promotion/2-16/2019**

Dated Peshawar, the 02/12/2020

Copy Forwarded for Information to:

1. Additional Secretary (General), Law Parliamentary Affairs and Human Rights,  
Department with the request to nominate an officer not below the rank of BPS-17.
2. P.A to Director General for Law & Human Rights.
3. Deputy Director (Admn), Directorate General of Laws and Human Rights.

**Assistant Solicitor (M&E)  
Directorate General of  
Law & Human Rights.**

Attest to  
Sikandar Ali  
Assistant Director  
Law & Human Rights

S  
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## WORKING PAPER

**SUBJECT: - PROMOTION OF MATRICULATE NAIB QASIDS (BPS-03) TO THE POST OF JUNIOR CLERK (BPS-11).**

According to the Service Rules of District Attorney KP method of recruitment/promotion of Junior Clerk (BPS-11) is as under. (Annex-A).

- (i). 33% by promotion, on the basis of seniority cum-fitness, from amongst Naib Qasids and Chowkidars with 2 years' service as such who have passed S.S.C examination, and.
- (ii). 67% by initial recruitment.

2. As per the Service Rules of District Attorney Khyber Pakhtunkhwa out of 29 vacant posts of Junior Clerk (BPS-11), the share for promotion is 06 posts from Naib Qasid (BPS-03) to the post of Junior Clerk (BPS-11) and share for initial recruitment is 23 posts of Junior Clerk. (Annex-B)

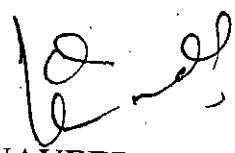
3. According to the final Seniority List the following list of Matriculate Naib Qasid (BPS-03) of the Offices District Attorney Khyber Pakhtunkhwa prepared for consideration for the promotion to the post of Junior Clerk (BPS-11) as per above promotion procedure mentioned in Service Rules of District Attorney Khyber Pakhtunkhwa. As 06 posts of Naib Qasid (BPS-03) to be filled by promotion from S. No. 1-6 to be considered for promotion and from Sr. No. 07-14 are in support in case if any one dropped for promotion from Sr. No. 1-6 for any reason next in number will be considered. (Annex-C).

S.#	Name	Designation	Date of Birth	Qualification	Date of 1 <sup>st</sup> Joining Govt: Services
1.	Mr. Muhammad Yousaf	Naib Qasid	1976	Matric	24.02.2004
2.	Mr. Muhammad Ilyas,	Naib Qasid	03-09-1982	Matric	15.01.2007
3.	Mr. Sher Bacha,	Naib Qasid	07-05-1978	Matric	01.07.2008
4.	Mr. Javaid	Naib Qasid	02-10-1966	Matric	07.07.2008
5.	Mr. Lal Zaman	Naib Qasid	05-03-1982	F.A	07.07.2008
6.	Mr. Mukhtiar Ahmad	Naib Qasid	08-09-1976	Matric	09.09.2008
7.	Mr. Farooq Shah	Naib Qasid	09-04-1969	Matric	10.08.2009
8.	Mr. Abdur Rehman Khalid	Naib Qasid	20-05-1970	F.A	10.08.2009
9.	Mr. Shakeel Ahmad	Chowkidar	10-05-1971	F.A	10.08.2009
10.	Mr. Muntazim Shah	Naib Qasid	08-10-1973	(B.A)	10-08-2009
11.	Mr. Feroz Khan	Chowkidar	02-05-1975	Matric	10-08-2009
12.	Mr. Syed Rasool	Naib Qasid	20-09-1975	Matric	10-08-2009
13.	Mr. Aziz Ahmad	Naib Qasid	01-05-1977	(F.A)	10-8-2009
14.	Muhammad Yasir	Chowkidar	02-03-1979	Matric	10-8-2009

*Attested*  
*Sikandar Ali*  
*Assistant Director*  
*Dy. Law & Human Rights*

U-3-11

4. The following are placed on file.
  - (a) Original PER's/ACR's of official concerned.
  - (b) Seniority List.
  
5. Certified that:-
  - (i) No penalty has been imposed during the last two years of the officials.
  - (ii) No Departmental/judicial inquiry/investigation/NAB case is lying pending against the officials.
  - (iii) PER's/ACR's record are complete.
  
6. The Departmental Promotion Committee is requested to consider the suitability of the above Government Servants for promotion from the post of Naib Qasid (BPS-03) to the post of Junior Clerk (BPS-11).



**NAVEEDA NAZ**  
**ASSISTANT SOLICITOR (M&E)**



**DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA, PESHAWAR**

Phone: 091-9217204

Email: [dir.kpk@gmail.com](mailto:dir.kpk@gmail.com)

Website: [www.humanrights.kp.gov.pk](http://www.humanrights.kp.gov.pk)

Plot No. 21, Sector B-2, Phase-V, Hayatabad, Peshawar

No: DG/SLT/AD/Promotion/2-16/2019

Dated: 30/03/2021

To

- The Additional Secretary General,  
Law, Parliamentary Affairs & Human Rights  
Department Khyber Pakhtunkhwa.
- Deputy Director (Admin),  
Directorate General of Law and Human Rights  
Khyber Pakhtunkhwa.

Subject: **DEPARTMENTAL PROMOTION COMMITTEE (DPC) MEETING.**

R/Sir,

I am directed to refer to the subject noted above and to state that the DPC meeting is scheduled to be held on 01.04.2021 at 10:00 AM under the Chairmanship of Director General of Law and Human Rights. The said meeting will be held at the office of Director General of Law and Human Rights. Working paper for meeting is enclosed.

You are, therefore requested to make it convenient to attend the said meeting on the above mentioned date, time and venue, please.

Yours faithfully

(NAVEEDA NAZ)

Assistant Solicitor (M&E)

**Endst: No. and date even.**

**Copy forwarded for information to:**

- PS to Secretary Law, Parliamentary Affairs and Human Rights Department Khyber Pakhtunkhwa.
- PS to Director General of Law and Human Rights.
- Master file.

(NAVEEDA NAZ)  
Assistant Solicitor (M&E)

Attested  
Skandor Ali  
Assistant Director  
DG Law & Human Rights



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WORKING PAPER

SUBJECT: -PROMOTION OF MATRICULATE NAIB QASIDS AND CHOWKIDARS (BPS-03) TO THE POST OF JUNIOR CLERK (BPS-11).

According to the Service Rules of District Attorney KP method of recruitment/promotion of Junior Clerk (BPS-11) is as under. (Annex-A).

- (i). 33% by promotion, on the basis of seniority cum-fitness, from amongst Naib Qasids and Chowkidars with 2 years' service as such who have passed S.S.C examination, and.
- (ii). 67% by initial recruitment.

According to the final Seniority List the following list of Matriculate Naib Qasid (BPS-03) of the Offices District Attorney Khyber Pakhtunkhwa prepared for consideration for the promotion to the post of Junior Clerk (BPS-11) as per above promotion procedure mentioned in Service Rules of District Attorney Khyber Pakhtunkhwa, 04 posts of Junior Clerk on the basis of promotions quota are lying vacant and to be filled by promotion. From S. No. 1-4 to be considered for promotion and from Sr. No. 5-10 are in support in case if any one dropped for promotion from Sr. No. 1-4 for any reason next in number will be considered. (Annex-C).

#	Name	Designation	Date of Birth	Qualification	Date of Acquiring SSC	Date of 1 <sup>st</sup> Joining Govt: Services
1.	Mr. Farooq Shah	N/Q	09-04-1969	Matric	1986	10.08.2009
2.	Mr. Abdur Rehman Khalid	N/Q	20-05-1970	F.A	1987	10.08.2009
3.	Mr. Muntazim Shah	N/Q	08-10-1973	(B.A)	1989	10-08-2009
4.	Mr. Shakeel Ahmad	Chowkidar	10-05-1971	F.A	1990	10.08.2009
5.	Mr. Feroz Khan	N/Q	02-05-1975	Matric	1992	10-08-2009
6.	Mr. Syed Rasool	N/Q	20-09-1975	Matric	1993	10-08-2009
7.	Mr. Gul Alam Jan	Chowkidar	04-05-1979	(F.A)	1995	10-08-2009
8.	Mr. Aziz Ahmad	N/Q	01-05-1977	(F.A)	1996	10-8-2009
9.	Muhammad Yasir	Chowkidar	02-03-1979	Matric	1996	10-8-2009
10.	Mr. Sajid Khan S/O Muhammad Ayaz	Chowkidar	18-05-1985	(B.A)	2003	10-08-2009

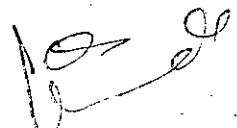
4. The following are placed on file.
  - (a) Original PER's/ACR's of official concerned.
  - (b) Seniority List.

*Attested*  
*G. Kandari*  
*Assistant Director*  
*Dept. Law & Human Rights*

Certified that:-

- (i) No penalty has been imposed during the last two years of the officials.
- (ii) No Departmental/judicial inquiry/investigation/NAB case is lying pending against the officials.
- (iii) PER's/ACR's record are complete.

6. The Departmental Promotion Committee is requested to consider the suitability of the above Government Servants for promotion from the post of Naib Qasids and Chowkidars (BPS-03) to the post of Junior Clerk (BPS-11).



**NAVEEDA NAZ**  
**ASSISTANT SOLICITOR**  
**(M&E)**

**MINUTES OF THE DEPARTEMENTAL PROMOTION COMMITTEE MEETING HELD ON  
28.01.2021 AT 11:00 AM**

**SUBJECT: - PROMOTION OF NAIB QASID (BPS-03) TO THE POST OF JUNIOR CLERK (BPS-11) IN THE OFFICES OF DISTRICT ATTORNEYS KHYBER PAKHTUNKHWA.**

A meeting of the Departmental Promotion Committee was held on 28.01.2021 at 11:00 AM under the Chairmanship of Mr. Dr. Asad Ali, Director General of Law and Human Rights to discuss the Promotion case of Naib Qasids (BPS-03) to the post of Junior Clerk (BPS-11) in the Offices of District Attorneys of Khyber Pakhtunkhwa.

2. The following attended the meeting:-

- |    |  |           |
|----|--|-----------|
| 1. | Mr. Dr. Asad Ali<br>Director General of Law<br>and Human Rights.                               | Chairman  |
| 2. | Mr. Noor Ali Khan,<br>Deputy Director (Admn)<br>Directorate General of Law<br>and Human Rights | Member    |
| 3. | Muhammad Bilal,<br>Section Officer (Codification),<br>Law Department.                          | Member    |
| 4. | Mst. Naveeda Naz,<br>Assistant Solicitor<br>Directorate General of Law<br>and Human Rights     | Secretary |

3. The Chair welcomed the participants and thereafter started discussion on the proposal with regard to the promotion of Naib Qasids (BPS-03) to the post of Junior Clerk (BPS-11) in the offices of District Attorneys of Khyber Pakhtunkhwa. The Secretary informed the participants that 29 posts of Junior Clerk (BPS-11) are lying vacant in the offices of District attorneys Khyber Pakhtunkhwa and as per Rule, method of recruitment against the post of Junior Clerk (BPS-11) is 33% by promotion on the basis of Seniority cum-fitness amongst the Naib Qasid (BPS-03) with at least 02 year service as such who have passed S.S.C examination.

Attested  
Sikandar Ali  
Assistant Director  
Law & Human  
Rights.

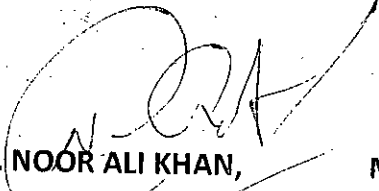
The participants thoroughly discussed the following eligible candidates proposed for promotion with working paper.

S.#	Name	Designation	Date of Birth	Qualification	Date of 1 <sup>st</sup> Joining Govt: Services
1.	Mr.Muhammad Yousaf	Naib Qasid	1976	Matric	24.02.2004
2.	Mr.Muhammad Ilyas,	Naib Qasid	03-09-1982	Matric	15.01.2007
3.	Mr.Sher Bacha,	Naib Qasid	07-05-1978	Matric	01.07.2008
4.	Mr.Javaid	Naib Qasid	02-10-1966	Matric	07.07.2008
5.	Mr.Lal Zaman	Naib Qasid	05-03-1982	F.A	07.07.2008
6.	Mr. Mukhtiar Ahmad	Naib Qasid	08-09-1976	Matric	09.09.2008
7.	Mr.Farooq Shah	Naib Qasid	09-04-1969	Matric	10.08.2009
8.	Mr.Abdur Rehman Khalid	Naib Qasid	20-05-1970	F.A	10.08.2009
9.	Mr.Shakeel Ahmad	Chowkidar	10-05-1971	F.A	10.08.2009
10.	Mr.Muntazim Shah	Naib Qasid	08-10-1973	(B.A)	10-08-2009
11.	Mr.Feroz Khan	Chowkidar	02-05-1975	Matric	10-08-2009
12.	Mr.Syed Rasool	Naib Qasid	20-09-1975	Matric	10-08-2009
13.	Mr.Aziz Ahmad	Naib Qasid	01-05-1977	(F.A)	10-8-2009
14.	Muhammad Yasir	Chowkidar	02-03-1979	Matric	10-8-2009

5. Thereafter the Departmental Promotion Committee recommended the Promotion of following Naib Qasids (BPS-03) to the post of Junior Clerk (BPS-11) in the offices of District Attorneys. The Officials on promotion will remain on probation in term of section 6(2) of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with the amended rule 15(1&4) of the Khyber Pakhtunkhwa Civil Servant (Appointment Promotion and Transfer) Rules 1989, for one year, if not extended for another year.

S.#	Name	Designation	Date of Birth	Qualification	Date of 1 <sup>st</sup> Joining Govt: Services
1.	Mr.Muhammad Yousaf	Naib Qasid	1976	Matric	24.02.2004
2.	Mr.Muhammad Ilyas,	Naib Qasid	03-09-1982	Matric	15.01.2007
3.	Mr.Sher Bacha,	Naib Qasid	07-05-1978	Matric	01.07.2008
4.	Mr.Javaid	Naib Qasid	02-10-1966	Matric	07.07.2008
5.	Mr.Lal Zaman	Naib Qasid	05-03-1982	F.A	07.07.2008
6.	Mr. Mukhtiar Ahmad	Naib Qasid	08-09-1976	Matric	09.09.2008

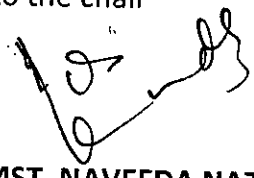
The meeting ended with a vote of thanks from and to the chair




**MR. NOOR ALI KHAN,**  
Deputy Director (Admn),  
Directorate General of Law  
& Human Rights



**MUHAMMAD BILAL,**  
Section Officer (Codification),  
Law Department



**MST. NAVEEDA NAZ,**  
Assistant Solicitor (M&E)  
Directorate General of  
Law and Human Rights.



**DR. ASAD ALI KHAN,**  
Director General of Law &  
Human Rights.



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**DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA, PESHAWAR**

Phone: 091-9217204

Email: [dhr.kpk@gmail.com](mailto: dhr.kpk@gmail.com)

Website: [www.humanrights.kp.gov.pk](http://www.humanrights.kp.gov.pk)

Plot No. 21, Sector B-2, Phase-V, Hayatabad, Peshawar.

Dated Peshawar, the 01/02/2021 / 1149-66

**ORDER:-**

No. DG/SLT/AD/Promotion/2-16/2019 / 1149-66 On the recommendation of the Departmental Promotion Committee the competent authority is pleased to promote the following Naib Qasids (BPS-03) of the Offices of District Attorneys in Khyber Pakhtunkhwa to the post of junior Clerk (BPS-11) on regular basis with immediate effect.

S.No.	Name of the Official
1.	Mr. Muhammad Yousaf
2.	Mr. Muhammad Ilyas,
3.	Mr. Sher Bacha,
4.	Mr. Javaid
5.	Mr. Laqman Zaman
6.	Mr. Mukhtiar Ahmad

1. The Officials on promotion will remain on Probation in term of Section 6(2) of the Khyber Pakhtunkhwa Civil Servant, 1973 read with the amendment Rule 15(1&4) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules, 1989, for one year, if not extended for another year.

-SD-

**DIRECTOR GENERAL**

Law and Human Rights Khyber  
Pakhtunkhwa

**No. DG/SLT/AD/Promotion/2-16/2019:-**

Dated Peshawar, the 01/02/2021

Copy Forwarded for Information to:

1. Accountant General, Khyber Pakhtunkhwa.
2. PS to Secretary Law, Parliamentary Affairs and Human Rights Department.
3. PA to director General, Law and Human Rights.
4. All District Attorneys Offices in Khyber Pakhtunkhwa.
5. All District Accounts Offices concerned.
6. Official Concerned for Compliance.
7. Master File for Record.

ASSISTANT SOLICITOR  
(M&E)

*Attested*  
*Sikandar Ali*  
*Assistant Director*  
*Law & Human Rights*

14  
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MINUTES OF THE DEPARTEMENTAL PROMOTION COMMITTEE MEETING HELD ON  
07.04.2021 AT 10:00 AM

SUBJECT: - PROMOTION OF NAIB QASIDS AND CHOWKIDARS (BPS-03) TO THE POST OF JUNIOR CLERK (BPS-11) IN THE OFFICES OF DISTRICT ATTORNEYS KHYBER PAKHTUNKHWA.

A meeting of the Departmental Promotion Committee was held on 07.04.2021 at 10:00 AM under the Chairmanship of Mr. Dr. Asad Ali, Director General of Law and Human Rights to discuss the Promotion case of Naib Qasids and Chowkidars (BPS-03) to the post of Junior Clerk (BPS-11) in the Offices of District Attorneys of Khyber Pakhtunkhwa.

2. The following attended the meeting:-

1. Mr. Dr. Asad Ali Chairman  
Director General of Law  
and Human Rights.
2. Mr. Noor Ali Khan, Member  
Deputy Director (Admn)  
Directorate General of Law  
and Human Rights
3. Muhammad Bilal, Member  
Section Officer (Codification),  
Law Department.
4. Mst. Naveeda Naz, Secretary  
Assistant Solicitor  
Directorate General of Law  
and Human Rights

3. The Chair welcomed the participants and thereafter started discussion on the proposal with regard to the promotion of Naib Qasids and Chowkidars (BPS-03) to the post of Junior Clerk (BPS-11) in the offices of District Attorneys of Khyber Pakhtunkhwa. The Secretary informed the participants that 04 posts of Junior Clerk (BPS-11) are lying vacant which are to be filled by promotion as per Rules.

*Attest*  
*Sikandar Ali*  
*Assistant Director*  
*Dep Law & Human Rights*

4. The participants thoroughly discussed the following eligible candidates proposed for promotion with working paper.

S.#	Name	Designation	Date of Birth	Qualification	Date of Acquiring SSC	Date of 1 <sup>st</sup> Joining Govt: Services
1.	Mr. Farooq Shah	N/Q	09-04-1969	Matric	1986	10.08.2009
2.	Mr. Abdur Rehman Khalid	N/Q	20-05-1970	F.A	1987	10.08.2009
3.	Mr. Muntazim Shah	N/Q	08-10-1973	(B.A)	1989	10-08-2009
4.	Mr. Shakeel Ahmad	Chowkidar	10-05-1971	F.A	1990	10.08.2009
5.	Mr. Feroz Khan	N/Q	02-05-1975	Matric	1992	10-08-2009
6.	Mr. Syed Rasool	N/Q	20-09-1975	Matric	1993	10-08-2009
7.	Mr. Gul Alam Jan	Chowkidar	04-05-1979	(F.A)	1995	10-08-2009
8.	Mr. Aziz Ahmad	N/Q	01-05-1977	(F.A)	1996	10-8-2009
9.	Muhammad Yasir	Chowkidar	02-03-1979	Matric	1996	10-8-2009
10.	Mr. Sajid Khan S/O Muhammad Ayaz	Chowkidar	18-05-1985	(B.A)	2003	10-08-2009

5. Thereafter the Departmental Promotion Committee recommended the Promotion of following Naib Qasids and Chowkidars (BPS-03) to the post of Junior Clerk (BPS-11) in the offices of District Attorneys. The Officials on promotion will remain on probation in term of section 6(2) of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with the amended rule 15(1&4) of the Khyber Pakhtunkhwa Civil Servant (Appointment Promotion and Transfer) Rules 1989, for one year, if not extended for another year.

S.#	Name	Designation	Date of Birth	Qualification	Date of Acquiring SSC	Date of 1 <sup>st</sup> Joining Govt: Services
1.	Mr. Farooq Shah	N/Q	09-04-1969	Matric	1986	10.08.2009
2.	Mr. Abdur Rehman Khalid	N/Q	20-05-1970	F.A	1987	10.08.2009
3.	Mr. Muntazim Shah	N/Q	08-10-1973	(B.A)	1989	10-08-2009
4.	Mr. Shakeel Ahmad	Chowkidar	10-05-1971	F.A	1990	10.08.2009



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



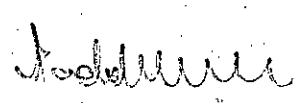
**MR. NOOR ALI KHAN,**  
Deputy Director (Admn),  
Directorate General of Law  
& Human Rights



**MUHAMMAD BILAL,**  
Section Officer (Codification),  
Law Department



**MST. NAVEEDA NAZ,**  
Assistant Solicitor (M&E)  
Directorate General of  
Law and Human Rights.



**DR. ASAD ALI KHAN,**  
Director General of Law &  
Human Rights.



DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA, PESHAWAR

Phone: 091-9217204

Email: [dir.kpk@gmail.com](mailto:dir.kpk@gmail.com)

Website: [www.humanrights.kp.gov.pk](http://www.humanrights.kp.gov.pk)

Plot No. 21, Sector B-2, Phase-V, Hayatabad, Peshawar

Dated Peshawar, the /03/2022

**TENTATIVE SENIORITY LIST OF NAIB QASIDS (BPS-03) OFFICES OF THE DISTRICT ATTORNEYS IN KHYBER PAKHTUNKHWA**

(AS STOOD ON )

S. No	Name of Official	Designation	Date of Birth	Qualification	Date of Acquiring SSC	Domicile	Date of 1 <sup>st</sup> Joining Govt: Services
1.	Mr.Feroz Khan	N/Q	02-05-1975	Matric	1992	Charsadda	10-08-2009
2.	Mr.SyedRasool	N/Q	20-09-1975	Matric	1993	Charsadda	10-08-2009
3.	Mr.Aziz Ahmad	N/Q	01-05-1977	(F.A)	1993	Charsadda	10-8-2009
4.	Mr.GulAlam Jan	Chowkidar	04-05-1979	(F.A)	1995	Charsadda	10-08-2009
5.	Muhammad Yasir	Chowkidar	02-03-1979	Matric	1996	Charsadda	10-08-2009
6.	Mr.Sajid Khan S/O Muhammad Ayaz	Chowkidar	18-05-1985	(B.A)	2003	Charsadda	10-08-2009
7.	Mr.FawadAhamd,	N/Q.	27-03-1985	Matric	2004	Charsadda	10-08-2009
8.	Muhammad Imran Khan	Chowkidar	15-03-1986	(B.A)	2004	Peshawar	10-08-2009
9.	Mr.Sikandar Khan	N/Q.	03-01-1991	Matric	2007	Charsadda	10-08-2009
10.	Mr.Taimur Khan	Chowkidar	07-04-1989	(F.A)	2007	Charsadda	17-08-2009
11.	Mr.Nasir Shah	Chowkidar	02-04-1983	(F.A)	1999	Charsadda	18-08-2009
12.	Mr.Imran Khan S/o Sahib Zada	Chowkidar	18-03-1985	(F.A)	2007	Charsadda	14-09-2009
13.	Mr.Zabardast Khan	N/Q	01-11-1977	(F.A)	2009	Shangla	01-04-2011
14.	Mr.Nasir Khan	Chowkidar	15-05-1974	FA	1981	Charsadda	08-08-2011
15.	Mr.Aziz Ahmad	N/Q	02-04-1977	(B.A)	1993	Dir Lower	08-08-2011
16.	Mr.Mudassir Shah	N/Q.	04-01-1982	(B.A)	1999	Charsadda	10-08-2011

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Attested  
Sikandar  
Ali,  
Assistant  
Deputy  
DG Law  
& Human  
Rights

S. No	Name of Official	Designation	Date of Birth	Qualification	Date of Acquiry SSC	Domicile	Date of 1 <sup>st</sup> Joining Govt. Services
17.	Mr.Hazrat Zaman	N/Q	12-04-1983	Matric)	1999	Charsadda	10-08-2011
18.	Mr.InamUllah	Chowkidar	15-09-1983	FA	2003	Peshawar	08-08-2011
19.	Mr.Bakht Room	N/Q	08-04-1977	B.A/DIT	1996	Swat	26-09-2011
20.	Mr.Said Ur Rehamn	Chowkidar	01-08-1978	(F.A)	2011	Charsadda	10-08-2009
21.	Mr.Afsar Ali	N/Q	02-04-1992	FA	2012	Peshawar	10-08-2011
22.	Mr.Imtiaz Khan	N/Q.	11-02-1972	FA	1989	Charsadda	15-03-2012
23.	Mr.Mushtaq Ali	Naib Qasid	15-08-1972	B.Com	1989	Charsadda	17-03-2012
24.	Mr.Diyar Khan	Sweeper	01-04-1975	(Matric)	1992	Charsadda	15-03-2012
25.	Mr.Nadeem Khan	Chowkidar	05-04-1976	F.A	1992	Charsadda	15-03-2012
26.	Mr.Nasrullah	Naib Qasid	11-04-1983	FA		Charsadda	15-03-2012
27.	Mr.Sajid Ali	Sweeper	01-03-1981	(B.A)	1997	Charsadda	15-03-2012
28.	Mr.Wajid Ali	Naib Qasid	04-04-1974	FA	2003	Charsadda	03-10-2012
29.	Mr.Abdul Aziz	Chowkidar	05-04-1986	BA	2005	Charsadda	17-03-2012
30.	Muhammad Jehangir	Naib Qasid	04-02-1988	FA	2006	Charsadda	17-03-2012
31.	Mr.Gul Khan	Naib Qasid	24-03-1986	Matric	2009	Charsadda	15-03-2012
32.	Mr.Saddam Hussain	Naib Qasid	01-03-1992	FA	2009	Charsadda	19-03-2012
33.	Mr.Kashif Khan	Chowkidar	01-01-1985	Matric	2011	Charsadda	17-03-2012
34.	Mr.Niaz Muhammad	Sweeper	02-05-1982	FA	2015	Charsadda	17-03-2012
35.	Mr.Zubair Khan	Naib Qasid	05-12-1991	BA	2007	Charsadda	27-09-2012
36.	Mr. Fazal Muhammad Roshan	N/Qasid	06-08-1969	SSC	1986	Charsadda	03-10-2012
37.	Mr.GulzarAli	Naib Qasid	01-09-1970	BA	1986	Charsadda	03-10-2012
38.	Mr.Murad Ali	Naib Qasid	17-11-1971	SSC	1987	Charsadda	03-10-2012
39.	Mr.Lalbadshah	Naib Qasid	15-01-1973	SSC	1989	Charsadda	03-10-2012
40.	Mr.IhsanUllah S/O Noor Muhammad	Chowkidar	01-04-1973	Matric	1989	Momd: Ageny	03-10-2012
41.	Mr.IhsanUllah S/O IkramUd Din	Chowkidar	08-02-1969	Matric	1990	Mardan	03-10-2012
42.	Mr.Hamid Ur Rehman	Naib Qasid	04-04-1974	FA	1990	Charsadda	03-10-2012
43.	Mr.Salim shah	Naib Qasid	30-08-1975	BA	1991	Charsadda	03-10-2012

S. No	Name of Official	Designation	Date of Birth	Qualification	Date of Acquiry	Domicile	Date of 1 <sup>st</sup> Joining Govt. Services
44.	Mr.Zafar Ali	Naib Qasid	06-07-1974	SSC	1992	Charsadda	03-10-2012
45.	Mr. Fazal Manan	Chowkidar	101-09-1976	FA	1992	Charsadda	03-10-2012
46.	Mr.Asim Ali Khan	Naib Qasid	01-05-1977	BA	1993	Charsadda	03-10-2012
47.	Mr.Adbus Sattar	Naib Qasid	01-01-1979	SSC	1994	Charsadda	03-10-2012
48.	Mr.Kausar Ali	Chowkidar	01-12-1979	Matric	1997	Charsadda	03-10-2012
49.	Mr.Bashir Ahmed	Chowkidar	14-02-1986	SSC	2003	Charsadda	03-10-2012
50.	Mr.Shah Faisal s/o Saifur Rehman	Naib Qasid	01-05-1988	BA	2006	Charsadda	03-10-2012
51.	Muhammad Ali	Naib Qasid	06-04-1991	BA	2007	Charsadda	03-10-2012
52.	Mr.Zain Ullah Jan	Naib Qasid	15-04-1991	FA	2007	Charsadda	03-10-2012
53.	Mr. Ramezjan	Naib Qasid	05-05-1991	DAE	2007	Charsadda	03-10-2012
54.	Mr. Farman Ul Haq	Naib Qasid	04-02-1990	FA	2008	Charsadda	03-10-2012
55.	Mr.Qaisar Khan	Naib Qasid	05-04-1991	BA	2008	Charsadda	03-10-2012
56.	Mr.Muhammad Adil S/o Zafar Ullah	Chowkidar	05-09-1992	DAE(E.Tech)	2008	Peshawar	03-10-2012
57.	Muhammad Usman	Naib Qasid	27-01-1993	DAE	2008	Charsadda	03-10-2012
58.	Mr. Tahir Shah	Chowkidar	04-02-1992	Matric	2009	Charsadda	03-10-2012
59.	Mr. Wisal Khan	Chowkidar	10-04-1993	SSC	2010	Charsadda	03-10-2012
60.	Mr. Amer Zeb	Naib Qasid	10-01-1994	DAE	2010	Charsadda	03-10-2012
61.	Mr.I.Iaqat Shah	Naib Qasid	10-04-1993	SSC	2011	Charsadda	03-10-2012
62.	Mr.Izat Shah	Chowkidar	31-08-1971	SSC	2012	Charsadda	03-10-2012
63.	Mr. Abdul Ghafoor	Chowkidar	18-04-1994	SSC	2012	Charsadda	03-10-2012
64.	Muhammad Abubakar	Naib Qasid	08-10-1974	FA	2013	Charsadda	03-10-2012
65.	Mr. Saeed Ud Din	Naib Qasid	06-11-1998	Matric/Shahdar Ul Alama	2010	Charsadda D.I.Khan	01-11-2012 07-10-2013
66.	Mr. Altaf Hussain	Chowkidar	02.02.1982	FA	2014	Charsadda	10.08.2009
67.	Mr.Ilaq Nawaz	Naib Qasid	15-01-1978	BA	1994	Nowshera	04-10-2013
68.	Muhammad Adnan	N/Q	01-01-1991	MA	2007	D. I. Khan	07-10-2013
69.	Mr. Mir Azam Khan	Naib Qasid	01-05-1993	BA	2010	Swabi	18-01-2014

S. No	Name of Official	Designation	Date of Birth	Qualification	Date of Acquiry SSC	Domicile	Date of 1 <sup>st</sup> Joining Govt: Services
70	Mr. Kamran S/o Muhammad Aslam	Chowkidar	06-04-1984	FA	17-06-2000	Haripur	25-08-2014
71	Malik Umair Wajid	Naib Qasid	07-07-1996	FSC	03.2012	Peshawar	08-06-2015
72	Mr. Nasir Shah	Naib Qasid	01.02.1984	Matric	2017	Charsadda	04.06.2008
73	Mr. Danyal Khan	Chowkidar	26-10-1980	Matric	2018	D. I. Khan	07.10.2013
74	Mr. Pazir Gul	Naib Qasid	08.02.1982	Matric	2019	Mardan	11.03.2005

-SD-  
(DIRECTOR GENERAL)  
Law & Human Rights  
Khyber Pakhtunkhwa

**Endst: No. DG/SLT/AD/Seniority/2-17/2019:**

Copy forwarded to:-

1. All District Attorneys in Khyber Pakhtunkhwa is requested to circulate Tentative Seniority list amongst concerned staff.
2. PS to Secretary, Law Department.
3. Officials concerned.

ASSISTANT SOLICITOR  
(M&E)