

# INDEX

## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO \_\_\_\_\_

APPEAL NO	INSTITUTION	ORIGINAL INSTITUTION	DECISION	PAGES
812/2018	-	13-06-2018	27.05.2024	78

Zawan Jan Khan vs Forest

Sr.No.	No of Pages	Documents	Page No
Part-A			
1	1 - 1	Order	01
2	02 - 17	Orders sheets	16
3	18 - 41	Memo of Appeal	24
4	42 - 42	Wakalatnama	1
5	43 - 74	Reply	22
6	65 - 78	Notices	14
7	-		
8	-		
9	-		
10	-		
11	-		
12	-		
Part-B			
1	-		
2	-		
3	-		

Total Pages in Part-A	78
Total Pages in Part-B	0

Muharrir Compilation

Incharge Judicial Branch

rule-8, 1b rules-9, 11 & 15 specially, summary for Chief Minister on the subject amendment in Khyber Pakhtunkwa, Civil Servants Act, 1973, revision of Superannuation Age from 60 to 63, was prepared on 08.04.2019, vide para 15, Secretary Law, observed "the instant case has been examined. Law department is of the view that the subject matter pertains to Establishment Department and as such amendment in the Khyber Pakhtunkwa, Civil Servants Act, 1973, comes under the Administrative purview of the Establishment Department and therefore, the instant proposal needs to be originated by the Establishment Department, after having satisfied that there will be no discontentment by the junior officers, whose promotions are likely to be effected", alongwith this, para 17 was added which reads "The establishment department if agreed with the proposal of Finance Department may initiated necessary amendments in the act *ibid*, for vetting of law department".

20. Thereafter, the matter went to Secretary Establishment who in para 19 observed which reads " a similarly nature case earlier received was taken up with

**ATTESTED**  
EXAMINER  
Peshawar High Court

Service Appeal No.812/2018 titled "Zawan Jan Vs. Forest Department"

ORDER

27<sup>th</sup> May, 2024 **Kalim Arshad Khan, Chairman.** Learned counsel for the appellant

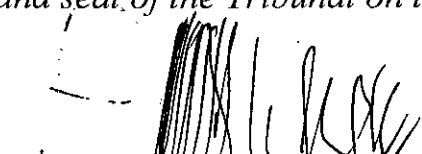
present. Mr. Shoaib Ali, Assistant Advocate General for the respondents present.

2. At the very outset, learned counsel for the appellant referred to the last Paragraph of the impugned order, which is shown to have been passed under the provisions of Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and the punishment awarded to the appellant vide the impugned order was compulsory retirement. Rule-9 prescribes only one punishment and i.e. removal from service.

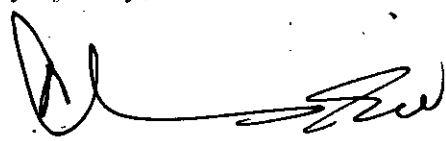
3. When confronted with the situation, learned AAG did not controvert the punishment awarded to the appellant in the case and says that the punishment was wrong as there was no punishment of compulsory retirement provided under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 in case of willful absence of a civil servant.

4. Therefore, we allow this appeal, set aside the impugned order and remit the matter to the respondents to pass appropriate and legal order. Costs shall follow the event. Consign.

5. *Pronounced in open Court at Abbottabad under our hands and seal of the Tribunal on this 27<sup>th</sup> day of May, 2024.*

  
(Muhammad Akbar Khan)  
Member (E)

\*Mutazem Shah\*

  
(Kalim Arshad Khan)  
Chairman  
Camp Court, Abbottabad

25.01.2024

1. Learned counsel for the appellant present. Mr. Syed Asif Masood Ali Shah learned Deputy District Attorney Shamraiz Khan, Range Officer the respondents present.

2. Former requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 28.03.2024 before D.B at camp court, Abbottabad. P.P given to parties.

SCANNED  
KPST  
Peshawar

\*KaleemUllah\*

(Muhammad Akbar Khan)  
Member (E)

(Rashida Bano)  
Member (J)  
Camp Court, Abbottabad

Due to cancellation of tour case is  
adjourn to 23/4/2024.

Rab  
H

23<sup>rd</sup> Apr. 2024

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

2. Being not prepared, learned counsel for the appellant requested for adjournment. Adjourned by way of last chance. To come up for arguments on 27.05.2024 before D.B at Camp Court, Abbottabad. P.P given to the parties.

SCANNED  
KPST  
Peshawar

\*Mutazem Shah\*

(Muhammad Akbar Khan)  
Member (E)  
Camp Court, A/Abad

(Kalim Arshad Khan)  
Chairman  
Camp Court, A/Abad

29.11.2023

Learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeks adjournment being not prepared for arguments. Adjourned. To come up for arguments on 13.12.2023 before the D.B at Camp Court Abbottabad. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

(Salah-ud-Din)  
Member (J)  
Camp Court Abbottabad

(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

\*Naeem Amin\*

13.12.2023

Learned counsel for the appellant present. Mr. Habib Anwar, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he is not feeling well today. Adjourned. To come up for arguments on 25.01.2024 before the D.B at Camp Court Abbottabad. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

(Fareeha Paul)  
Member (E)  
Camp Court Abbottabad

(Salah-ud-Din)  
Member (J)  
Camp Court Abbottabad

\*Naeem Amin\*

S.A. 812/2018


4

- 27<sup>th</sup> Sept. 2023
1. Learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.
  2. Former made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 26.10.2023 before D.B at Camp Court, Abbottabad. P.P given to the parties.

SCANNED  
KPST  
Peshawar

\*Mutazem Shah \*


  
(Salah Ud-Din)  
Member (J)

  
(Kalim Arshad Khan)  
Chairman  
Camp Court, Abbottabad

- 26<sup>th</sup> Oct. 2023
01. Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, DDA for the respondents present.
  02. As the learned Chairman is on leave, the bench is incomplete. To come up for arguments on 29.11.2023 before the D.B at camp court, Abbottabad. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

\*Fazle Subhan, P.S\*

  
(Fareeha Paul)  
Member(E)  
Camp Court, A/Abad

27.03.2023

Appellant present through counsel.

Asad Ali, learned Assistant Advocate General for respondents present.

Former made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 22.05.2023 before D.B at Camp Court, Abbottabad. Parcha Peshi given to the parties.

(Muhammad Akbar Khan)  
Member (E)  
Camp Court, A/Abad

(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

22-5-23

Reader Note,

Tour to camp court was not scheduled, to come up for the same on 21-6-23

21<sup>st</sup> June, 2023 1. Junior to counsel for the appellant and Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

2. Junior to counsel for the appellant requested for adjournment as senior counsel is not available today.

Adjourned. To come up for arguments on 27.09.2023 before D.B at Camp Court, Abbottabad. P.P given to the parties.

(Rashida Bano)  
Member (J)

(Kalim Arshad Khan)  
Chairman  
Camp Court, Abbottabad

SCANNED  
KPST  
Peshawar

15.06.2022

Nemo for appellant.

Noor Zaman Khan Khattak, learned District Attorney for respondents present.

Notice be issued to appellant and his counsel for 16.08.2022 for arguments before D.B at Camp Court, Abbottabad.

8

*Not out for 15/8  
Mr. Saide 15/8*

(Fareeha Paul)  
Member (E)  
Camp Court, A/Abad

(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

*16.8.22*

*Due to summer vacation the case is adjourned to 18-10-22 for the same.*

18.10.2022

Nemo for the appellant. Mr. Sajid, Range Officer alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Previous date was changed on Reader note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments before the D.B 26.12.2022.

(Mian Muhammad)  
Member (E)

(Salah-ud-Din)  
Member (J)

*26.12.22*

*Due to winter vacation therefore case is adjourned to 27-3-23*

*Reader*



14.03.2022

Due to retirement of the Hon'ble Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same on 16.05.2022.

  
Reader

16.05.2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments before D.B on 19.05.2022 at camp court Abbottabad.



(Fareeha Paul)  
Member(E)



(Kaleem Arshad Khan)  
Chairman  
Camp Court Abbottabad

19.05.2022

Learned counsel for the appellant present. Syed Naseer Ud Din, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned but as a last chance. To come up for arguments before D.B on 15.06.2022 at camp court Abbottabad.



(Fareeha Paul)  
Member(E)



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

22.12.2021

Junior of learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG alongwith Mr. Sajid Khan, Deputy Ranger for respondents present.

Junior of learned counsel for the appellant sought adjournment on the ground that learned counsel for the appellant is out of station. Adjourned. To come up for arguments before D.B on 14.03.2022 at camp court Abbottabad.

(Mian Muhammad)  
Member(E)

(Salah Ud Din)  
Member(I)  
Camp Court Abbottabad

21.09.2021

Nemo for the appellant. Mr. Nadeem, Store Keeper alongwith Mr. Usman Ghani, District Attorney for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for arguments before the D.B on 16.11.2021 at Camp Court Abbottabad.

(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)  
CAMP COURT ABBOTTABAD

(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

16.11.2021

Appellant present through counsel.

Muhammad Rasheed learned Deputy District Attorney alongwith Muhammad Shamrez Range Officer for respondents present.

Former made a request for adjournment in order to prepare the brief. Request is accorded. To come up for arguments on 22.12.2021 before D.B at Camp Court, Abbottabad.

(Rozina Rehman)  
Member (J)

(Chairman)  
Camp Court, Abbottabad

19.01.2021

Due to COVID-19, the case is adjourned for the same on 17.02.2021 before D.B.


  
READER


17.02.2021

Nemo for parties.

Noor Zaman Khattak, learned District Attorney for present.

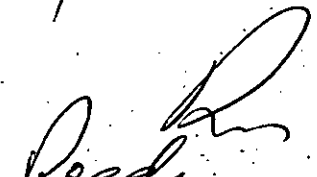
Preceding date was adjourned on a reader's note, therefore, both the parties be put on notice for 20.04.2021 before D.B for arguments at Camp Court, Abbottabad.

  
(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, Abbottabad

  
(Rozina Rehman)  
Member (J)  
Camp Court, Abbottabad

20-4-21

Due to covid-19, case 13 adjourned to 21-8-21 for same

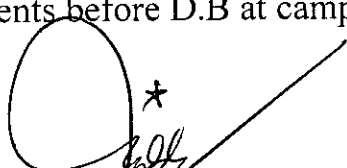
  
Reader

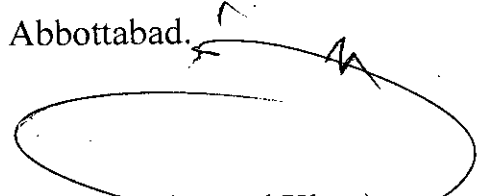
19.11.2020

(11)

Counsel for the appellant is present. Mr. Usman Ghani,  
District Attorney for respondents present.

Learned counsel for the appellant requested for  
adjournment for the reason that he is indisposed of today.  
Request is acceded. The appeal is adjourned to 19.01.2021 for  
arguments before D.B at camp court Abbottabad.

\*  
(Mian Muhammad)  
Member(E)

  
(Muhammad Jamal Khan)  
Member(J)  
Camp Court Abbottabad

13

21.10.2019

Junior to counsel for the appellant present. Mr. Usman Ghani District Attorney present. Mr. Muhammad Nadeem, Junior Clerk for the respondents present. Representative of respondents has submitted parawise comments which are placed on record. To come up for rejoinder if any, and arguments on 16.12.2019 before D.B at Camp Court, Abbottabad.



Member  
Camp court, A/Abad

16.12.2019

Appellant in person and Mr. Usman Ghani, District Attorney for the respondents present. Appellant requested for adjournment on the ground that his counsel is ill and cannot attend the Tribunal today. Adjourned to 23.01.2020 for rejoinder and arguments before D.B at Camp Court Abbottabad.



(Hussain Shah)  
Member  
Camp Court Abbottabad



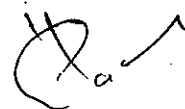
(M. Amin Khan Kundi)  
Member  
Camp Court Abbottabad

23.01.2020

Appellant in person present. Mr. Ziaullah, DDA alongwith Mr. M. Nadeem, Store Keeper for the respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings on 19.02.2020 before D.B at camp court Abbottabad.



Member



Member  
Camp Court A/Abad

18.04.2019

Clerk to counsel for the applicant present. Mr. Muhammad Bilal, DDA for respondents present. Written reply/comments not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 20.06.2019 before S.B at camp court Abbottabad.

(Ahmad Hassan)  
Member  
Camp Court A/Abad

19.06.2019

Counsel for the appellant and Mr. Muhammad Bilal, DDA for respondents present. Written reply on behalf of respondents not submitted. Notice be issued to the respondents for submission of written reply/comments. Case to come up for written reply/comments on 21.08.2019 before S.B at camp court Abbottabad.

(Ahmad Hassan)  
Member  
Camp Court A/Abad

21.08.2019

Learned counsel for the appellant present. Written reply not submitted. Khurshid SDFO representative of the respondent department seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 21.10.2019 before S.B at Camp Court, Abbottabad.

Member  
Camp Court A/Abad

912/18


20.12.2018

Mr. Amanullah Khan Salik, Advocate for appellant present.


Learned counsel for the appellant contends, inter-alia, that the impugned order dated 05.03.2018, whereby, the appellant was awarded major penalty of compulsory retirement from service was passed also on the ground that the appellant was mentally ailing. In such circumstances, it was incumbent upon the respondents to have referred the appellant to a properly constituted Medical Board which was not done.


Points raised warrant admission of instant appeal for regular hearing. Admit. The appellant is directed to deposit of security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 20.02.2019 before the S.B at Camp Court, Abbottabad.

Appellant deposited  
Security & Process Fee

  
Chairman  
Camp court, A/Abad

20.02.2019

 None present on behalf of the appellant. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Muhammad Riaz, Forester for the respondents present. Written reply on behalf of respondents not submitted. Learned Deputy District Attorney requested for further adjournment. Adjourned. To come up for written reply/comments on 18.04.219 before S.B at Camp Court Abbottabad.

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad



16

19.09.2018

Since 21st September, 2018 has been declared as public holiday on account of Moharram, therefore, case is adjourned to 15.11.2018 for preliminary hearing before the S.B at camp court, Abbottabad.

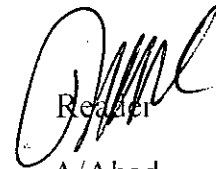


Chairman

Camp court, A/Abad

15.11.2018

Counsel for the appellant present. Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 20.12.2018 at camp court Abbottabad.



Receiver

A/Abad

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 812/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/06/2018	<p>The appeal of Mr. Zawan Jan Khan resubmitted today by Mr. Amanullah Khan Salik Advocate may be entered in the Institution Register and put up to the Worthy Chairman per order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR → 16/12</p>
2-	16.07.2018	<p>This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>16/7/18</u>.</p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p> <p>Clerk to counsel for the appellant present and seeks adjournment due to general strike of the Bar. Adjourned. To come up for preliminary hearing on 27.07.2018 before S.B.</p> <p style="text-align: right;"><i>[Signature]</i> (Ahmad Hassan) Member</p>
	27.07.2018	<p>Neither appellant nor his counsel present. Since the case pertains to territorial jurisdiction of Hazara Division, hence the same be fixed before S.B at camp court Abbottabad on 21.09.2018.</p> <p style="text-align: right;"><i>[Signature]</i> Chairman</p>

The appeal of Mr. Zawan Jan Khan Mali/Naib Qasid (Rtd) village Damrai Allai Battagram received today i.e. on 13.06.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓1- The law under which appeal is filed is wrong.
- ✓2- Annexures of the appeal may be flagged.
- ✓3- Memorandum of appeal may be got signed by the appellant.
- ✓4- Wakalat nama in favour of appellant be placed on file.
- ✓5- One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1223 /S.T,

Dt. 13/06 /2018.

*[Signature]*  
 REGISTRAR 13/6/18  
 SERVICE TRIBUNAL  
 KHYBER PAKHTUNKHWA  
 PESHAWAR.

Mr. Amanullah Khan Salik Adv.  
High Court Abbottabad.

Sir;

*Re submitted, after attending all  
 the objections and then accordingly  
 removed.*

*[Signature]*  
 21/6  
 /18

19

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

S.A.No. 812 /2018

ZawanJan Khan Mali/NQ (Rtd) Village Damrai Tehsil Allai

District Battagram.....PETITIONER

**VERSUS**

Provincial Govt; Khyber Pakhtunkhwa through Secretary

Forest Peshawar & Others.....RESPONDENTS

**SERVICE APPEAL**

**INDEX**

S.No.	Description of Document	Annexure	Page No.
1.	Writ petition with Affidavit	--	1-5
2.	Addresses of Parties	--	6
3.	Transferred Documents	"A"	7-10
4.	Mutual Transfer documetns	"B"	11-14
5.	Compulsory Retirement order	"C"	15-16
6.	Departmental Appel	"D"	17
10.	Order on Appeal	"E"	18
11.	Other Documents	--	19-22
12.	Vikalat Nama	--	

**PETITIONER**

**Through:**

**(Amanullah Khan Salik)**  
(Advocate High Court)  
Abbottabad.

Dated:-11/04/2018

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

S.A.No. 812 /2018

1. ZawanJan Khan Mali/NQ (Rtd) Village Damrai Tehsil Allai  
District Battagram.....PETITIONER

Khyber Pakhtukhwa  
Service Tribunal

**VERSUS**

Diary No. 1053

Dated 13/06/2018

1. Provincial Govt; Khyber Pakhtunkhawa through Secretary  
Forest Peshawar.  
2. Chief Conservator Forest Khybar Pakhtunkhawa Peshawar.  
3. Conservator Watershed management circle Abbottabad.  
4. Divisional Forest Officer, Daur Watershed Division  
Abbottabad.....RESPONDENTS

Filed to-day  
13/6/18  
Registrar

SERVICE APPEAL, UNDER SECTION (4)  
Service Tribunal ACT 1974 AGAINST THE  
ORDER DATED 05.03.2018. WHEREBY  
IMPOSING MAJOR PENALTY, APPELLANT  
IS AWARDED THE PENALTY OF  
COMPULSORY RETIREMENT.

**PRAYER:-**

Allowing this appeal the penalty imposed be set aside, appellants be reinstated / services be restored, with all back benefits or any other just and proper remedy, as this honourable forum deem fit.

***Respectfully Sheweth;***

This appeal proceeds on the following major facts and main legal grounds.

1. That, appellant appointed as Mali, in the year 85 served the department, to the best of his ability, efficiency and dutifully, at different places under all the difficult circumstances and in hard areas.
2. That, lastly appellant was transferred to Mansehra, where he reported his arrival, but was refused to be adjusted there. Documents are attached as.....**Annexure "A"**
3. That, appellant, along with one Shah Nawaz also put his case for mutual transfer but, this attempt proved a cry in the desert. Copy is.....**Annexure "B"**
4. That, all during this and without any thing brought to the Knowledge of the appellant, major penalty of compulsory retirement to imposed upon him vide order dated 05/03/2018. Copy is.....**Annexure "C"**
5. That, appellant, then moved departmental appeal. Copy is.....**Annexure "D"**

6. That, the appeal so filed by the appellant is answered in negative vide order dated 18.05.2018 and received to appellant on home address on 24.05.2018, hence this appeal. Copy is.....**Annexure "E"**

**GROUNDS:-**

- I. That, order dated 05.03.2018 is against law, facts, and arbitrary whimsical hit by the principles of natural justice and not tenable.
- II. That, the very order is harsh, self-contradictory, wherein all the facts narrated are imaginary speculative office work and has no nexus with the reality.
- III. That, why the respondent, withheld the salary and allowances of the appellants, and why used the services of his son without pay.
- IV. That, in view of the remarks contained in the impugned order and NOTIFICATION NO, SO (R-VI) C & AD /1-3/2015 dated 19.04.2016, was it not imperative to have constituted a Medical Board Notification, attached.
- V. That, respondents, throughout have acted with malafide. Once in the advance age of his services he was treated from post to pillar, then making excuse of his so called unproved absences, imposed a major penalty, while on one hand earned bad name for him at the end of lengthy service of 33 years (1985-2018) and on the other


hand shut out but out an out the door of decreased son quota to his children.

- VI. That, was not the official entitled to earned leave.
- VII. That, was not the case of appellant fit for LPR.
- VIII. That, appellant never absented, but whenever, he tried to get casual leave or to be adjusted at palace convenient to him in the last days of his services he has been shown up hill journey with the intention to create adverse circumstances.
- IX. That, ordinarily towards the end of the services, more benvelence, benign and soft hand is made but In present case, the poor work charge illetrate fellow is court marshald, rather to award him with extra benefits.

*It is therefore humbly prayed that Allowing this appeal the penalty imposed be set aside appellant be reinstated / services be reinstated, with all back benefits or any other just and proper remedy, as this honourable forum deem fit*

  
PETITIONER

Through:

  
(Amanullah Khan Salik)  
(Advocate High Court),  
Abbottabad.

Dated:- 11/6 /2018



24

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

S.A.No. \_\_\_\_\_ /2018

ZawanJan Khan Mali/NQ (Rtd) Village Damrai Tehsil Allai  
District Battagram.....PETITIONER

**VERSUS**

Provincial Govt; Khyber Pakhtunkhawa through Secretary  
Forest Peshawar & Others.....RESPONDENTS

**Service Appeal**


**AFFIDAVIT**

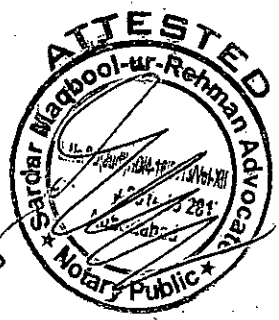
Zawarjan Khan Mali/NQ (Rtd) Village Demari Tehsil Allai District  
Battagram. *petitioner*, do hereby solemnly affirm and declare  
on Oath that the contents of instant *Writ Petition* are true and  
correct to the best of my knowledge and belief and that nothing  
has been concealed from this Hon'ble Court.



**DEPONENT**

**IDENTIFIED BY:-**

  
**(Amanullah Khan Salik)**  
Advocate High Court,  
Abbottabad.

20/6/2018  


25

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

**S.A.No. /2018**

ZawanJan Khan Mali/NQ (Rtd) Village Damrai Tehsil Allai  
District Battagram.....PETITIONER

**V E R S U S**

Provincial Govt; Khyber Pakhtunkhawa through Secretary  
Forest Peshawar & Others.....RESPONDENTS  
**Service Appeal**

**ADDRESSES OF THE PARTIES**

***Respectfully Sheweth;***

The addresses of the parties are as under


ZawanJan Khan Mali/NQ (Rtd) Village Damrai Tehsil Allai  
District Battagram.....PETITIONER

1. Provincial Govt; Khyber Pakhtunkhawa through Secretary Forest Peshawar.
2. Chief Conservator Forest Khybar Pakhtunkhawa Peshawar.
3. Conservator Watershed management circle Abbottabad.
4. Divisional Forest Officer, Daur Watershed Division Abbottabad.....RESPONDENTS

**PETITIONER**


***Through:***

Dated:- 11/6 /2018

  
**(Amanullah Khan Salik)**  
(Advocate High Court)  
Abbottabad

26

7

FOREST DEPARTMENT UNHAR WATERSHED DIVISION MANSEHRA		Phone # 0997-920142  No. _____ /UWS, Dated <u>03/7/2017</u>
---	---	---

To  
 The Conservator of Forests/PD  
 Watershed Management Circle  
 Abbottabad

**ANNEXURE**  
**A**


Subject: POSTING/TRANSFER OF NAIB QASID/CANCELLATION OF ORDER THEREOF.

Memo:  
 Reference your office order No. 26 dated 30.03.2017

In compliance of your above cited office order Mr. Zawan Jan Naib Qasid has reported his arrival for duty in Unhar Watershed Division Mansehra. The official is physically and mentally crippled man who can not properly hear, speak and too feeble even to walk without the support of his accompanying son. Therefore the services of Mr. Zawan Jan are hereby returned to DFO Daur Watershed Division Abbottabad for further needful.

It is therefore further requested that the office order cited in the reference may kindly be cancelled please.

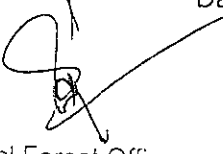
Divisional Forest Officer  
 Unhar Watershed Division  
 Mansehra

*Attested*  
  
 A.K. Salik (Advocate)  
 BATTAGRAM

No. 2223 /UWS

Copy for favor of information and needful to:

1. Divisional Forest Officer Daur Watershed Division Abbottabad with reference to the Office Order cited above.
2. ✓ Mr. Zawan Jan Naib Qasid with the directives to report back to the office of DFO Daur Watershed Division Abbottabad for further needful.

  
 Divisional Forest Officer  
 Unhar Watershed Division  
 Mansehra

(27)

8

B-12-11  
331

OFFICE ORDER NO. 26 DATED ABBOTTABAD THE 30/03/2017 ISSUED BY  
MR. JAVED ARSHAD CONSERVATOR OF FORESTS/PD WATERSHED MANAGEMENT CIRCLE  
ABBOTTABAD

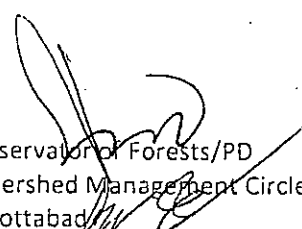
Mr. Zawan Jan Naib Qasid is hereby transferred from Daur Watershed  
Division to Unhar Watershed Division Mansehra in the interest of public  
service. The order will take effect from 01-07-2017, after retirement of Mr.  
Shamsul Arifeen Naib Qasid

Sd/-  
(Javed Arshad)  
Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

Copy forwarded to the:

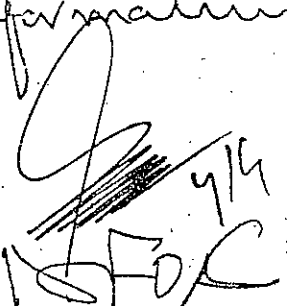
1. Divisional Forest Officer Unhar Watershed Division Mansehra
  2. ✓ Divisional Forest Officer Daur Watershed Division Abbottabad
  3. Establishment Branch
- For information and necessary action.

Attested  
A.K. Sultani (Advocate)  
BATTAGRAM

  
Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

NO. 1271 Rows dt 29/4/2017


Copy forwarded to  
Mr. Zawan Jan Naib Qasid for information  
and action.

  
9/4  
15/FO/C

Divisional Forest Officer  
R. No. 1198  
Date 4/4/17  
Daur Watershed Division Abbottabad

28

9

DIVISIONAL FOREST OFFICER			Daur Watershed Division, Abbottabad..
No. /DWS			Ph: 0992-9310305, Fax 0992-9310303
		Dated	/ /2017 ?

To,

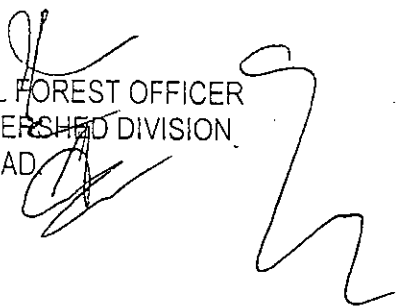
The Chief Conservator of Forests  
Northern Forest Region-II  
Khyber Pakhtunkhwa,  
Abbottabad.


Subject:- APPLICATION OF NAIB QASID FOR MUTUAL TRANSFER

Memo. Reference your No.1307-8/E, dated 6.9.2017.


Mr. Zawan Jan Naib Qasid was adjusted against the post of Mali in this Division vide CF/PD Watershed Office Order No.36 dated 8.3.2012 due to non-availability of post of appropriate cadre. It is pertinent to note that Government of KPK instructed in his letter No.SOR-1(E&AD)-1/85/Vol-II dated 15.2.2003 issued by Add. Secretary Govt. of KPK Regulation Wing Peshawar (Posting & Transfer Policy) for ensuring the posting of proper person on proper post, hence in view of above instructions the application of the Naib Qasid could not be entertained as no proper post is available in this Division please.

DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD



Attested  
  
A.K. Salik (Advocate)  
PATTAGRAM

29 10

	• 0992 9310304	OFFICE OF THE CONSERVATOR OF FORESTS/PD WATERSHED MANAGEMENT CIRCLE FOREST OFFICES, JAIL ROAD ABBOTTABAD
	• 0992 9310303	
No. <u>3265</u> /E-11, dated <u>23</u> / 05/2013.		

To

The Divisional Forest Officer  
Kohistan Watershed Division  
Besham

**Subject: POSTING / TRANSFER OF CLASS-IV EMPLOYEES.**

Memo: Reference your letter No.597/Estt dated 24-04-2013.

As recommended vide your letter cited above, this office letter No.3640/E dated 31-05-2012 regarding detailment of Mr. Zawan Jan Naib Qasid is hereby Withdrawn.

You are advised to direct the Naib Qasid to report his arrival to Divisional Forest officer Daur Watershed Division Abbottabad immediately under intimate to this office.

*[Handwritten signature]*

Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

Attested  
*[Signature]*  
A.I. Sidiqi (Address)  
ABBOTTABAD

No. \_\_\_\_\_ /E-7/

Copy in continuation of this office letter No. 3641/Estt dated 31-05-2012, and Divisional Forest officer Kohistan Watershed Division Besham letter No.598/Estt dated 24-04-2013 forwarded to Divisional Forest officer Daur Watershed Division Abbottabad for information and necessary action.

Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

No. 688/E dt. 22/05/2013

copy forwarded to the  
RO Besham m/c/A for  
direct employee.

*[Handwritten initials]*  
22/5/13  
DIVISIONAL FOREST OFFICER  
Kohistan Watershed Division  
Besham

30

11

ANNEXURE  
B

CHIEF CONSERVATOR OF FORESTS  
Northern Forest Region-II



Civil Line Forest Offices  
Abbottabad  
☎ 0992-9310410  
☎ 0992-9310343  
E-mail: [ccfnorth@gmail.com](mailto:ccfnorth@gmail.com)

No. 1307-B/E dated Abbottabad the 26 /09/2017.

To

The Divisional Forest Officer

1. Hazara Tribal Forest Division  
Battagram.
2. Daur Watershed Division Abbottabad.

Subject: APPLICATION OF NAIB QASID FOR MUTUAL TRANSFER

Memo:

Enclosed please find herewith a copy an application preferred by M/S Shah Nawaz and Khawan Jan Naib Qasid for mutual transfer which is self contained.

Please furnish your comments/view on mutual transfer of theforesaid Naib Qasid at the earliest for further necessary action.

Encl: As above

*Attested*  
*[Signature]*  
A.H. Sultik (Advocate)  
BATTAGRAM

*[Signature]*  
Chief Conservator of Forests  
Northern Forest Region-II Abbottabad  
Khyber Pakhtunkhwa







خدمت جناب DFO مہاراجہ دوڑواٹر سٹیڈ ایسٹ آباد

جناب عالی!

گزارش سپیکس میرا ٹرانسفر 2010

میں کو بہستان ڈائری سٹیڈ سے دوڑواٹر سٹیڈ ایسٹ آباد  
حویلیاں میں ہوا ہے۔ میں اپنے ڈیلوٹی پوری طرح  
سے سرانجام دے رہا ہوں۔ لیکن اب میرے ریٹائرمنٹ  
کا وقت نزدیک آ گیا ہے۔ اب مجھ سے میرے افیشران  
جبری ریٹائرمنٹ لینا چاہتے ہیں۔ اور مجھے ڈیلوٹی کرنا  
نہیں دیتے اور مجھ سے یہ حق چھیننا چاہتے ہیں جبکہ یہ  
حق میرے حقوں کا ہے۔ میرے سیٹ دبر دستی مخالفی کروا کر  
اپنے کسی بندے کو بھرتی کرنا چاہتے ہیں۔

لہذا سائل کو اپنے وقت پورے ہونے تک ڈیلوٹی کرنا دیکھو  
میرا تنخواہ باج میںوں سے بند کیا ہوا ہے۔ لہذا میں سٹریٹ  
آدمی بال بچے دار ہوں میرے بچوں کو آزاد کر دیجئے۔

عین نواریش ہوگی

آپ کا تابع ملازم

نائب قاصد زوان جان

زوان جان

Attest  
A.K.Saliki (Advocate)  
BATTAGRAM

34

15

OFFICE ORDER NO. 34 DATED ABBOTTABAD THE 05 <sup>3</sup> / 10/21/2018 ISSUED BY  
MR. MR. TAIMUR ILYAS DIVISIONAL FOREST OFFICER DAUR WATERSHED DIVISION,  
ABBOTTABAD.

ANNEXURE

C

Mr. Zawan Jan Naib Qasid was transferred to Unhar Watershed Division, Mansehra vide Conservator of Forests Watershed Management Circle, Abbottabad office order No.26 dated 30.3.2017 against the vacant post of Naib Qasid and the same has been endorsed to the incumbent vide No.1271/DWS dated 4.4.2017 with the direction to report his arrival at new place of duty. The official was relieved on 1.7.2017 and reported his arrival on same date in the office of DFO Unhar Watershed Division Manshera.

The Divisional Forest Officer Unhar Watershed Division referred back the case with the remarks that "the official is physically and mentally crippled man who cannot properly hear, speak and too feeble even to walk without the support of his accompanying son". In the meanwhile, the transfer order No.26 dated 4.8.2017 has been cancelled by the Conservator of Forests Watershed Management Circle Abbottabad.

The DFO Daur Watershed Division has directed the official vide letter No.488/DWS dated 27.9.2017 that in the light of remarks passed by the DFO Unhar Watershed Division this office is unable to continue the pay and allowance till production of fitness certificate issued by the Medical Board, and he may be produced it otherwise payment of pay and allowances will not be made to him.

Consequently the official taken casual leave for 4 days on 29.9.2017 but he failed to rejoin his duty up to 3.10.2017. Resultantly, the Range Officer reported his absence to this office for appropriate action. The explanation was called vide No.544/DWS dated 9.10.2017 and Mr. Zawan Jan Naib Qasid was directed to join his duty and to justify the unlawful absence within 7 days otherwise exparte action will be taken against him. The Range Officer tried to contact him telephonically and use all available sources for communication but in vain.

In view of non responding by the delinquent official the then DFO Daur Watershed Division issued charge sheet to the accused vide No.670-73/DWS, dated 25.10.2017 and assigned the enquiry to Mr. Muhammad Ashraf Superintendent along-with enquiry file to deal the matter appropriately but the enquiry officer returned the enquiry with the remarks that in existence of comments passed by the DFO Unhar Watershed Division Mansehra no departmental enquiry is required rather consider the case for his retirement.

Attested  
K. Salih (Advocate)  
BATTAGRAM

Taking lenient view this office served a notice for resumption of his duty within 7 days vide No.880/DWS dated 21.11.2017 through register cover at his home address but the same is received back undelivered. Finally a notice of absence was published in local leading news papers dated 11.1.2018 in which he had been directed to resume his duty within fourteen (14) days but the official disregarded the directives of higher officer.

In view of above circumstances the undersigned being authority reach at the conclusion that Mr.Zawan Naib Qasid is not willing to join his duty and also feeble and have mentally ailing condition.

Therefore, as provided Under Section-9 of Khyber Pakhtunkhwa Efficiency and Discipline Rules,2011, the incumbent is hereby awarded major penalty of compulsory retirement with effect from the date of his absence i.e.29.9.2017 from his service in the interest of public service.

Sd/- (TAIMUR ILYAS)  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD.

No. \_\_\_\_\_ /

Copy forwarded to:-

1. The Conservator of Forests, Watershed Management Circle, Abbottabad.
2. The Budget & Accounts Officer Govt. of Khyber Pakhtunkhwa Environment Department, Peshawar.
3. The Range Officer Watershed Range Havelian for information.
4. I/C Establishment Branch Daur Watershed Division, Abbottabad for information and immediate necessary action.
- ✓ 5. Mr.Zawan Jan Mali/NQ for information.

  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD.

*Attested*  
*A.K.Shaikh*  
A.K.Shaikh (Advocate)  
ABBOTTABAD

حضرت صاحب نوروں کے صاحبزادے (وارث شاہ) اسٹیم آباد

ANNEXURE

D

محلہ اسماعیل برفلاف فلم معصومہ مورم 5 <sup>3</sup>/<sub>2578</sub>

جہاں جاتا! درخواست اسماعیل برفلاف

۱۔ سائل کا تاریخ پیدائش ۱۹۵۸ جون اور میں نیشنل پرفارمنس  
کا تاریخ ۱۵ <sup>6</sup>/<sub>2578</sub> ہے۔

۲۔ سائل نے ۱۹۶۵ میں محلہ ہذا میں کوئی ملک کریمت مشکل اوقات میں  
ایک ملے ملے تک ملن اور محنت سے خدمات انجام دیے ہیں

۳۔ میں ملازمت کی آخری حقہ میں کبھی آگے سے کوستان اور کو  
کوستان سے اسٹیم آباد سائل کو تبدیل کیا جا مارا۔ اور سائل  
کے خدمات کا قدر نہیں لگایا۔ حالانکہ سائل درجہ چہارم ملازم ہے


۴۔ سائل نے از میں جیلے بیانے بنائے ہوئے سائل کو جبری طور پر نیشنل یافتہ  
قرار دیا۔ ایک طرف ایک سالہ لاکھوہ سے محروم کیا گیا۔ اور دوسری  
دہ چہارم ملازم کے نیشنل یافتہ کے لیون کو ملازمت سے محروم کرنے کا  
نوٹیشن لگا دیا۔

رہنما صاحبہ ریسرچ ڈیپارٹمنٹ کو فرمائے ہیں۔ سائل کو ماہوار  
تعمیرات عطا فرمائیں تاکہ سائل کو فرار دینے سے روک دیا جائے۔ اور دوسری  
طرف کے کٹوتیوں سے سائل کو فرار دینے سے روک دیا جائے۔

28.3.2018

اسٹیم آباد

Attested  
A.K. Sultani (Advocate)  
RAIFAGRAM

<p><b>Javed Arshad</b> Conservator of Forests</p>		<p>Office of the Conservator of Forests Watershed Management Circle Jail Road Abbottabad Phone No. 0992 9310304 Fax No. 0992 9310303</p>
<p>No. <u>7033</u> /appeal</p>		<p>Dated Abbottabad the <u>18</u> /5/2018</p>

Mr. Zawan Jan Mali (Rtd)  
Village damrai PO Banna Allai  
District Battagram.

**ANNEXURE**

**E**

Subject. **APPEAL AGAINST OFFICE ORDER NO.34 DATED 5/3/2018.**

Reference your application dated 23/3/2018 received on 29/3/2018

The DFO Daur Watershed Division Abbottabad vide his letter No.1961/A-B dated 11/5/2018 has reported that you have given full opportunity to save your service but you could not avail the chance, due to which the action were taken after fulfillment of the all codel formalities under the provision of rules by the competent authority.

Hence, your appeal cannot be considered at this stage and has politely been rejected.

Conservator of Forests  
Watershed Management Circle  
Abbottabad.

No. /appeal

Copy forwarded to DFO Daur Watershed Division Abbottabad for information with reference to his letter cited above.

Conservator of Forests  
Watershed Management Circle  
Abbottabad.

Accepted  
A.K. Smith (Advocate)  
BATTAGRAM



38

19

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

Dated Peshawar the April 19, 2016

NOTIFICATION

No. SO(R-VI)E&AD/1-3/2015. In exercise of the powers conferred by Section 26 of the Khyber Pakhtunkhwa Province Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Chief Minister of Khyber Pakhtunkhwa Province is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules 1989, the following further amendments shall be made, namely:

AMENDMENTS

1. In rule 4,-

- a) in sub-rule (3), for the figures and word "3 to 15", the figures and word "6 to 15" shall be substituted; and
- b) in sub-rule (4), for the figures and word "1 and 2", the figures and word "3 and 5" shall be substituted.

2. In rule 10,-

- a) in sub-rule (2), in second proviso, for the figures and word "1 to 4" the figures and word "3 to 5" shall be substituted; and
- b) for sub-rule (4), the following shall be substituted, namely:

"(4) Where a civil servant dies or is rendered incapacitated or invalidated permanently during service or retired on medical board, notwithstanding the procedure provided for in sub-rule (2), the appointing authority may appoint one of the children of such civil servant or if the child has not attained the age prescribed for appointment in Government service, the widow or wife as the case may be, of such civil servant, to a posts in any of the basic pay scales 3 to 11 in Provincial cadre post and basic pay scales 3 to 12 in District cadre posts:

Provided that the child or the widow or wife, as the case may be, possesses the minimum qualification prescribed for appointment to the post:

Provided further that if there are two widows or wives of the deceased civil servant, as the case may be, preference shall be given to the elder widow or wife:

Provided also that appointment under this sub-rule is subject to availability of a vacancy and if more than one vacancies, in different pay scales, are available at a time and the child or the widow or wife, as the case may be, possesses the qualifications eligible for appointment in more than one post, such child or the widow or wife, as the case may be, shall ordinarily be appointed to the post carrying higher pay scale:

Provided also that the provision of this sub-rule shall not be applicable to posts falling within the purview of the Commission.

*Attested*  
*A.K. Satik*  
A.K. Satik (Advocate)  
PESHAWAR

3. In rule 12, in sub-rule (3), for the figures and word "1 and 2", the figures and word "3 and 5" shall be substituted.

CHIEF SECRETARY,  
KHYBER PAKHTUNKHWA.

*A. E. Salih*  
*Salih*

A. E. Salih (i/s/office)

PLANNING

ENDS: NO & EVEN DATE

Copy is forwarded to:-

1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Development Department.
2. Additional Chief Secretary (FATA), FATA Secretariat Peshawar.
3. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
4. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
5. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
6. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. All Divisional Commissioners in Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
10. All Deputy Commissioners in Khyber Pakhtunkhwa and Political Agents in FATA.
11. The Registrar Peshawar High Court, Peshawar.
12. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
13. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
14. All Additional Secretaries, Deputy Secretaries and Section Officers in Establishment & Administration Department.

(SAIFULLAH KHAN)  
SECTION OFFICER (REG-VI)



<sup>33</sup>(4) Where a civil servant dies or is rendered incapacitated/invalidated permanently during service then notwithstanding the procedure provided for in sub-rule (2), the appointing authority may appoint one of the children of such civil servant, or if the child has not attained the age prescribed for appointment in Government Service, the widow/wife of such civil servant, to a post in any of the Basic Pay Scales 1-10:

Provided that the child or the widow/wife as the case may be, possesses the minimum qualification prescribed for appointment to the post:

Provided further that if there are two widows/wives of the deceased civil servant, preference shall be given to the elder widow/wife.

Provided also that the appointment under this sub rule is subject to availability of a vacancy and if more than one vacancies in different pay scales are available at a time, and the child or the widow/wife, as the case may be, possesses the qualifications making him or her eligible for appointment in more than one post, he /she shall ordinarily be appointed to the post carrying higher pay scale.

Provided further that this shall not apply to any post in BPS-1-10 falling in the purview of the <sup>34</sup>[Khyber Pakhtunkhwa] Public Service Commission.

<sup>35</sup>(5) Notwithstanding anything contained in any rule for the time being in force, two percent of all posts in each basic pay scale to be filled in by initial recruitment shall be reserved for disabled candidates and ten percent of all posts meant for initial recruitment shall be reserved for female candidates:

Explanation-I---For the purpose of reservation under this sub-rule "disability" does not include such disability which hampers in the smooth performance of the duties required of a disabled candidate.

Explanation-II---Ten per cent quota reserved above shall be in addition to the posts exclusively reserved for female candidates.

<sup>36</sup>(6) Notwithstanding anything contained in any rule for the time being in force, five per cent of all posts in each basic pay scale to be filled in by initial recruitment shall be reserved for candidates hailing from earthquake affected areas of District Mansehra, Battagram, Shangla, Kohistan and Abbottabad (Calamity hit area) for a period of three years commencing from 1st February, 2006.

<sup>37</sup>(7) Notwithstanding anything contained in any rule for the time being in force, <sup>38</sup>[three] percent of all the posts in each basic pay scale to be filled in by initial recruitment shall be reserved for candidates belonging to minorities in addition to their participation in the open merit:

Provided that, the reservation shall not apply to—

- <sup>33</sup> Sub rule (4) substituted vide Notification No. SOR-VI (E&AD)1-3/2011/Vol-VIII, dated 31-08-2012.
- <sup>34</sup> Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.
- <sup>35</sup> Sub rule (5) substituted vide Notification No. SOR-VI (E&AD)1-10/03 (VI), dated 04-12-2007.
- <sup>36</sup> Sub rule (6) inserted vide Notification No. SOR-VI(E&AD)1-3/03 (VI), dated 01-02-2006
- <sup>37</sup> Sub rule (7) added vide Notification No. SOR-VI(E&AD)1-3/08, dated 06-01-2009
- <sup>38</sup> Subs. vide Notification No. SORIV/E&AD/1-10(Minority)/2008, dated 08.01.2014.

Attested  
*A.K. Salih*  
A.K. Salih (Advocate)  
BATTAGRAM

(41)

O.P.S.S O.P.S.S

To,

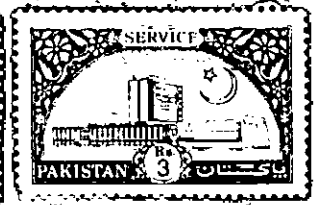
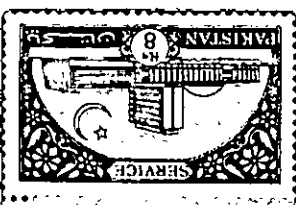
Mt. Zauvam Jam Mali (Retd)

Village damrai P.O. Bomma

Allai District Battagram.

وان جان  
(گالی ریشائی)

Dispatcher  
Conservator of Forests  
Haidre-22, Civil Lines, Lahore



# وکالت نامہ

42

کورٹ فیس  
تینتی

بعدالت KHYBAR PUKHTUNKHAWA SERVICES TRIBUNAL PESHAWAR

Govt. نام Zawan Jan Khan

مجاناب: SERVICE APPEAL دعوے یا جرم APPELLANT

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی بمقام: ABBOTT ABAD.

اچھر خزانہ صاحب **امان اللہ سالک ایڈووکیٹ ہائی کورٹ (بٹگرام) محمد مسلم**

(جمال عبدالناصر، امیر محمد خان، نیلا محمد خان، عثمانیہ اللہ خان) نمبر ڈسٹرکٹ بار ایسوسی ایشن "BATTAGRAM"

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص روبرو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہونگے نیز وکیل صاحب موصوف صدر مقام کچھری کے علاوہ کسی جگہ یا کچھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے اور مقدمہ کچھری کے علاوہ کسی جگہ یا کچھری کے اوقات سے پہلے یا بروز تعطیل یا کچھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عینانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونگے مجھ کو کُل ساختہ پرداخت صاحب موصوف مثل کردا ذات منظور و مقبول ہوگا۔ اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہرقسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہرقسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہرقسم کے بیان دینے اس پر عیاشی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت جانے پیرو نجات از کچھری صدر اپیل و برآمد کی مقدمہ یا منسوفی ڈگری یکطرفہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از گرفتاری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ عینانہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اس کے کسی جز کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل یا پیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے قانون کو بھی ہر امر میں دہی اور ویسے ہی اختیار حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

ATTESTED  
&  
ACCEPTED

Amanullah Khan Salik  
Advocate, High Court  
Distt. Courts BATTAGRAM

لہذا وکالت نامہ لکھ دیا ہے کہ سند رہے مورخہ..... ماہ.....

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ال عبد ال عبد

زوان جان خان

**Before The Khyber Pakhtunkhwa Service Tribunal Peshawar****Service Appeal No. 812 of 2018**

Zawan Jan  
Daur Watershed Division Abbottabad

**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Secretary Forest of Khyber Pakhtunkhwa, Peshawar.
2. Chief Conservator of Forests Khyber Pakhtunkhwa Peshawar.
3. Conservator of Forests, Watershed Management Circle Abbottabad.
4. Divisional Forest Officer, Daur Watershed Division Abbottabad.

**Subject:** Para –wise comments on behalf of Respondents No. 1, 2 , 3 & 4

RESPECTFULLY SHEWETH

**PRELIMINARY OBJECTIONS:**

1. That the appellant has got no locus standi.
2. That the appeal is not maintainable in its present form.
3. That the appeal is hit by the principle of Laches.
4. That the instant appeal is bad for mis-joinder and non-joinder of necessary parties.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appeal is hit by the principle of Estoppel.
7. That the appeal is time barred.

1. Pertain to record hence needs no comments.
2. It is correct that the appellant was transferred from Daur Watershed Division to Unhar Watershed Division Mansehra vide CF Watershed O/O No 26 dated 30.03.2017, **(Copy**

(44)

**annex as annexure -A)** but DFO Unhar referred back with the remarks that the official is physically & mentally crippled man who cannot properly hear ,speak and too feeble even he cannot walk without the support of his son.DFO Unhar requested to C.F |Watershed for cancellation of above order vide his letter No.21/UWS dated 03.07.2017 **(Copy of DFO Unhar letter is annex as annexure- B)**The order has been cancelled vide Conservator of Forests Watershed Management circle Abbottabad office order No.02. dated 04.08.2017 **(Copy of office order is annex as annexure- C)**

3. It is correct but not appropriate as per instructions given by Govt of KPK vide No.SOR -1 (E-AD 1/85 Vol-II dated 15.03.2003 **(Copy of letter annex as annexure -D)**

4. Incorrect Mr. Zawan Jan was transferred from Daur Watershed to Unhar Watershed but DFO Unhar referred back him with the remarks that he is unable to perform his duties & even cannot move without help of his son. In the above circumstances this office directed the Naib Qasid for submission of medical fitness Certificate but the certificate was not provided by him.

On 03.10.2017 Range Officer Havelian has reported to this office that Mr.Zawan Jan applied for four days casual leave for Muharam-UI-Haram Holidays on 29.09.2017, but on expiry of leave period he did not rejoin his duty till 03.10.2017, **(Copy of report of RFO is annex as annexure -E)** Resultantly explanation was called vide No.542 dated 9.10.2017 **(Copy enclosed as annexure-F)** & Mr. Zawan Jan Naib Qasid was directed to rejoin his duty and to justify the unlawful absence within 7 days otherwise ex-parte action will be taken against him. The Range Officer tried to contact him

45

telephonically and used all available sources for communication but in vain. and on non receipt of reply a notice was served upon the Naib Qasid on his home address which was received back undelivered **(copy of notice is annex as Annexure -G)** Finally another notice was published in local news papers but no reply was received from Zawan Jan **(copy of news paper is annex as Annexure-H)** and in silence of appellant no way was left, except to initiate disciplinary proceedings against accused official & finally major penalty was awarded to him vide DFO Daur office order No.34 dated 05.03.2018. **(Copy annex as Annexure -I)**

5. As per rules in practice the appellant preferred an appeal before next higher authority i.e. CF watershed Management project & prayed for sit aside of impugned office order No.34 dated 05.03.2018. The copy of appeal **(Annexure-J)** The CF Watershed being a authority rejected the appeal vide letter No.7033/Appeal dated 18.05.2018. The copy of CF watershed letter is **(Annexure-K)**
6. As stated in Para -5

### Ground

- I. Incorrect ,The opportunity was given to the official as per rules in vogue and than awarded punishment under rule 9 of E & D Rules 2011. **( Annexure-L).**
- II. Incorrect the action was taken under rules as stated in above Para No.4
- III. Incorrect ,the department has never withheld the salaries any allowances of the appellant nor used the services of his son during the period of his service up to 28.09.2017 i.e. the date of compulsory retirement **(Annexure -M)**
- IV. Incorrect the directives given in the notification are not be applicable in the instant case neither the appellant has retired on the age of superannuation nor declared invalid by the medical board .furthermore the appellant had not died during the service.

V. As stated in Para-4 above.

VI. The appellant never applied for earned leave.

VII. The appellant never applied for LPR

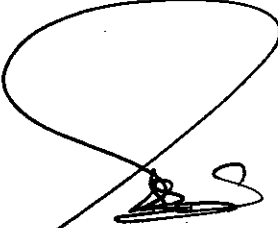
VIII. No comments

IX. In case of compulsory retirement the salary of 365 days was not allowed to the retired official on compulsory grounds provided in rules (Annexure N).

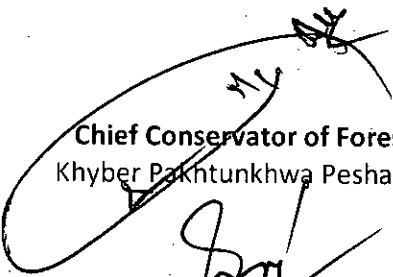
It is therefore, requested that the instant appeal may kindly be dismissed with cost.

Dated \_\_\_\_/\_\_\_\_/2019


Respondent No.1

  
Secretary of Forests  
Khyber Pakhtunkhwa, Peshawar

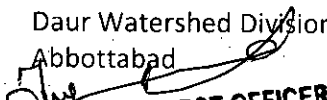
Respondent No.2

  
Chief Conservator of Forests  
Khyber Pakhtunkhwa Peshawar

Respondent No.3

  
Conservator of Forests  
Watershed Management  
Circle Abbottabad

Respondent No.4

  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad  
**DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD**  
5/2/19

27  
**Annex-A**

① B-12  
3

OFFICE ORDER NO. 26 DATED ABBOTTABAD THE 30 /03/2017, ISSUED BY MR. JAVED ARSHAD CONSERVATOR OF FORESTS/PD WATERSHED MANAGEMENT CIRCLE ABBOTTABAD

Mr. Zawan Jan Naib Qasid is hereby transferred from Daur Watershed Division to Unhar Watershed Division Mansehra in the interest of public service. The order will take effect from 01-07-2017, after retirement of Mr. Shamsul Arifeen Naib Qasid

Sd/-  
(Javed Arshad)  
Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

Copy forwarded to the:

1. Divisional Forest Officer Unhar Watershed Division Mansehra
  2. ✓ Divisional Forest Officer Daur Watershed Division Abbottabad
  3. Establishment Branch
- For information and necessary action.

*Attested*

Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

*Javed Arshad*  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

No. 1271 Rows dt 24/4/17, 20

Copy forwarded to ~~Mr. Zawan Jan Naib Qasid~~ Mr. Zawan Jan Naib Qasid for information and action.

*Javed Arshad*  
4/17  
15/4/17



Attested

*Javed Arshad*  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD


15  
17



48

Annex-B

11

FOREST DEPARTMENT UNHAR WATERSHED DIVISION MANSEHRA		Phone # 0997-920142 No. _____ /UWS, Dated 03/7/2017
---	---	--

To  
 The Conservator of Forests/PD  
 Watershed Management Circle  
 Abbottabad

Subject: POSTING/TRANSFER OF NAIB QASID/CANCELLATION OF ORDER THEREOF.

Memo:  
 Reference your office order No. 26 dated 30.03.2017.

In compliance of your above cited office order Mr. Zawan Jan Naib Qasid has reported his arrival for duty in Unhar Watershed Division Mansehra. The official is physically and mentally crippled man who can not properly hear, speak and too feeble even to walk without the support of his accompanying son. Therefore the services of Mr. Zawan Jan are hereby returned to DFO Daur Watershed Division Abbottabad for further needful.

It is therefore further requested that the office order cited in the reference may kindly be cancelled please

Divisional Forest Officer  
 Unhar Watershed Division  
 Mansehra  
 No. 22-23 /UWS

*A. H. A. B.*

*[Signature]*  
 Divisional Forest Officer  
 Daur Watershed Division  
 Abbottabad

Copy for favor of information and needful to:

1. Divisional Forest Officer Daur Watershed Division Abbottabad with reference to the Office Order cited above.
2. Mr. Zawan Jan Naib Qasid with the directives to report back to the office of DFO Daur Watershed Division Abbottabad for further needful.

*[Signature]*  
 Divisional Forest Officer  
 Unhar Watershed Division  
 Mansehra

*E.C*  
*wait for decision of the CF/PD*

*The official may be asked to produce a medical certificate.*

Divisional Forest  
 R. No. 26  
 Date 6/7/17

Attested

*[Signature]*  
 DIVISIONAL FOREST OFFICER  
 DAUR WATERSHED DIVISION  
 ABBOTTABAD

49

# Annex-C

97

15  
B-1  
40

OFFICE ORDER NO. 02 DATED ABBOTTABAD THE 04/08 2017, ISSUED BY MR. JAVED ARSHAD CONSERVATOR OF FORESTS/PD WATERSHED MANAGEMENT CIRCLE ABBOTTABAD.

This office order No. 26 dated 30/03/2017, is hereby cancelled in the interest of public service with immediate effect.

Sd/-  
(Javed Arshad)  
Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

Copy forwarded to the:-

1. Divisional Forest Officer Daur Watershed Division Abbottabad for information with reference to our discussion dated 04-08-2017.
2. Divisional Forest Officer Unhar Watershed Division Mansehra for information and necessary action. This is with reference to his NO.21/UWS dated 03/07/2017.
3. Officials concerned for information and necessary action.

Conservator of Forests/PD  
Watershed Management Circle  
Abbottabad

Divisional Forest Officer  
R. No. 183  
Date: 07/8/17  
Daur Watershed Division Abbottabad

*[Handwritten signature]*  
07/8/17  
A.A.W.

*[Handwritten signature]*  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

Attested

*[Handwritten signature]*  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

Copy of letter No.SOR-1(E&AD)1-1/85/Vol.II), dated 15<sup>th</sup> February,2003 from Ghulam Jilani Asif, Additional Secretary (Reg.) Government of NWFP, Establishment and Administration Department (Regulation Wing) addressed to all Administrative Secretaries to Government of NWFP and others.

Subject POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

Dear Sir, I am directed to refer to the subject noted above and to say that in supersession of all policy instructions issued in this behalf, the competent authority has approved the following Posting Transfer Policy:

- i- All the postings / transfers shall be strictly in public interest and shall not be abused / misused to victimize the Government servants.
- ii- All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting / transfers of their choice, and against the public interest.
- iii- All contract Government employees, appointed against specific posts, cannot be posted against any other post.
- iv- The normal tenure of posting shall be three years subject to the condition that for the officers / officials posted in unattractive areas, the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v- Months of March and July are fixed for posting / transfer of the officers / officials excluding the officers in B-19 and above in the Province. Posting / transfer in Education and Health Departments shall be made in March while the remaining Departments shall make posting / transfers in July. There shall be a ban on posting / transfers throughout the year excluding the aforesaid two months. However, there shall be no restriction in cases where postings / transfers of Government employees become inevitable on other months, due to promotion / retirement / creation of new posts / return from long leave / involvement in disciplinary proceedings and adjustment of surplus staff for which specific relaxation shall be obtained from the Chief Minister.
- vi- While making postings / transfers from settled areas to FATA and vice-versa specific approval of the Governor, NWFP needs to be obtained.
- vii- Officers may be posted on executive administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where in the Police Station (Thana) of his area residence is situated.
- viii- No postings / transfers of the officers / officials on detailement basis shall be made.
- ix- Regarding the posting of husband / wife, both in Provincial services, efforts where possible would be made to post such persons at one station and this will be subject to the public interest.
- x- All the posting / transferring authorities may facilitate the postings / transfers of the unmarried female Government Servants at the station of the residence of their parents.
- xi- Officers / officials except DCOs and SPs who are due to retire within one year may be posted to their option. On posts in the Districts of their domiciles and be allowed to serve till the retirement.
- xii- In terms of Rule-17(1) and (2) read with Schedule-II of the Government of NWFP Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officers in column 2 thereof:

1	2
Outside the Secretariat	
1- Officers of the all Pakistan Unified Group, i.e. DMG, PSP including Provincial Police Officer in BPS-18 and above	Chief Secretary in consultation with the Establishment Department and the Department concerned with the approval of the Chief Minister.
2- Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS (EG) and PCS (SG)	--do--
3- Head of Attached Departments and other officers in B-19 & above in all the Department	--do--
In the Secretariat	
4- Secretaries	Chief Secretary with the approval of the Minister
5- Other Officers of and above the rank of Section Officer	Secretary of the Department concerned / Chief Secretary/Secretary Establishment.
(a) Within the same Department	
(b) Within the Secretariat from one Department to another	

Approved

*[Signature]*

**DIVISIONAL FOREST OFFICER  
DUAR WATERSHED DIVISION  
ABBOTTABAD**

*[Signature]*

**DIVISIONAL FOREST OFFICER  
ON**

6- Officials upto the rank of Superintendent:	Secretary of the Department concerned. Secretary of the Department in consultation with Head of Attached Deptt. Concerned. Secretary (Establishment)
(a) Within the same Department.	
(b) To and from an attached Department.	
(c) Within the Secretariat from one Department to another	

- xiii- While considering postings/transfers proposal at the concerned authorities shall keep in mind the following.
- a- To ensure the posting of proper persons on proper posts, the annual confidential reports, past and present record of service, performance on post held presently and in past and general reputation with focus on the integrity of the concerned officers/officials be considered.
  - b- Tenure on present post shall also be taken into consideration and the posting / transfers shall be in the best public interest.
- xiv- Government servants including District Government employees feeling aggrieved due to the orders of posting/transfers authorities may seek remedy from the next higher authority/ the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/transfer orders could be exercised only in the following cases:
- i- Pre-mature posting/transfer or posting/transfer in violation of the provisions of this policy.
  - ii- Serious and grave personal (humanitarian) grounds.

To streamline the postings/transfer in the District Government and to remove any irritant/confusions in this regard the provision of Rule-25 of the North-West Frontier Province District Government Rules of Business 2001 read with schedule-IV thereof is referred. - As per schedule-IV the posting/transfer authorities for the officers/officials shown against each as under:

S.#	Officers	Authority.
1.	Posting of District Coordination Officer and Executive District Officer in a District	Provincial Government
2.	Posting of District Police Officer	Provincial Government
3.	Other Officer in BPS-17 and above posted in the District	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a- Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure; and
- b- Require an officer to hold charge of more than one post for a period exceeding two months.

I am directed further directed to request that the above noted policy may be strictly observe / implemented.

Yours faithfully,  
Sd/- Ghulam Jilani Asif  
Add. Secretary (REG.)

Endst. No. SOR.I(E&AD)1-1/85, dated Peshawar the 15-02-2003.

Copy forwarded to:  
x.x.x.x

Endst. No. and date even

Sd/- Deputy Secretary. (Reg-1)

Attested

Copy forwarded to:  
x.x.x.x

Sd/- Section Officer (Reg.1)

No. 2600 - 2601

/Estt., dated Peshawar the 26-02-2003

Copy forwarded to the:  
1- All Conservator of Forests in NWFP.  
2- All Directors, in NWFP.

*[Signature]*  
DIVISIONAL FOREST OFFICER  
DUAR WATERSHED DIVISION  
ABBOTTABAD

For guidance and necessary action.

Sd/- CCF, NWFP, Peshawar

(original letter is at Page - 507 of Postings) Transfer  
General file -

عنوان - غیر حاضری رپورٹ زوان خان حالی / وکندہ

صبا عالی ، 31/10/2017 No 201/ROH dt

جیسا کہ علم میں ہے کہ زوان خان حالی / وکندہ حویلیاں  
ڈائریکٹوریٹ سٹیج ایک بورڈ اسٹاف کے لئے اکثر بھاری سہولتوں سے اور  
اس نے اپنے اپنے کو دوران ڈھولی اپنے سہارے کیلئے مائلو ایسا ہوا ہے  
تاریخ 29/10/17 کو اپنے سہارے کے ساتھ حرم کی طبیعت پر گیا ہے اور آج  
تاریخ 31/10/17 تک وہیں نہیں آیا ہے۔ اور سرکاری ملازمت ڈھولی  
حویلیوں میں حویلیوں میں سرکاری ملازمت کے علاوہ کسی دیگر  
ملازمت کو چھوڑے۔ جس کے لئے اس نے اپنی طبیعت سے حرم کو ان  
حقیقتوں کے دوران غائبی طور پر ہی رہا ہے۔

صبا عالی - آج صبح 31/10/2017 کو طبیعت پر گیا ہے اور  
صباح سے حرم کو اپنے لئے حرم سے Attend نہیں کیا  
لہذا غیر حاضری رپورٹ میں حرم کو اپنے لئے اور دوران  
کے آگے حرم کو اپنی کارروائی میں لگائی جائے۔  
Attend

31/10/17

Divisional Forest Officer  
Quar Watershed Division  
Abbottabad

صبا عالی کے احکامات کے مطابق زوان خان حالی / وکندہ

Acct / Ec


Allested  
DIVISIONAL FOREST OFFICER

DIVISIONAL FOREST OFFICER  
QUAR WATERSHED DIVISION  
ABBOTTABAD

53

# Annex-F

86

Divisional Forest Officer		Daur Watershed Forest Division Abbottabad Phone #: 0992-9310305
No. 542 /B-40		Dated 9/11/2017

To,

Mr, Zawan Jan  
Naib Qasid  
c/o Range Officer  
Watershed Range Havelian.

B-14

Subject: WILLFUL ABSENCE FROM DUTY

Memo:

The Range Officer Watershed Range Havelian has reported that you are absent from your place of duty and your whereabouts are not known to him since 29.9.2017. He has further reported that due to your ill health you cannot perform your duty effectively. As you know that due to your absence from duty, the Government property at Havelian Watershed Range Office is at risk, in case of any mishap you will personally be responsible for the losses sustained to Govt if any.

It is therefore directed to explain your position within 7 days after receipt of this letter, else ex parte action will be taken against you, as per rules in vogue.  
Please acknowledge the receipt.

DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD  
No. 543 B-40

Attested  
naib  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

Copy forwarded to

1. Range Forest Officer Havelian for information & necessary action with reference to his letter No.201/ROH dated 3.10.2017. He should hand over the letter to the official under proper receipt and send the same to this office for record.

R

Attested


DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

54

# Annex - G

Annex - G  
2

9

Divisional Forest Officer		Daur Watershed Forest Division Abbottabad Phone # 0992-9310305
No. 880 /B-14		Dated 2/ 11/2017

To,

Mr, Zawan Jan  
Naib Qasid  
Havelian.


Subject: ABSENCE FROM DUTY


Memo: Reference this office letter No.488 dated 27.9.2017 NO.543 /DWS dated 9.10.2017 & No: 670-73 /DWS dated 25.10.2017.

You were directed vide this office letter under reference to provide the fitness certificate about your health, instead of providing medical fitness certificate, you are absent from your duty from 29.9.2017 without unknown reasons. In this regard your explanation was called by the undersigned and directed to explain your position within 7 days. Today is 20.11.2017, but your reply has not been received in this office nor your whereabouts are known to your Range officer.

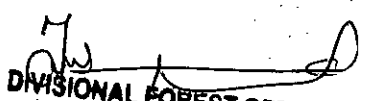
You are once again directed to explain your position within three days after issue of this letter. In case of failure, expatriate action will be initiated against you as per rules in vogue.

*Attended*

  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

*Attended*

  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

# Annex - G

Annex - G

(55)

379

To,

M/S. Jagan Jan  
Neel Gasret.  
K/c Village Puna Kas  
Distt. Bhatnagar  
Distt. Mehsana

of 2nd Form

See me file  
20/11

EDUCATION  
ABBOTTABAD

FOREST OFFICER  
DUAR WATERSHED DIVISION  
ABBOTTABAD

circulate  
no newspaper

Attest

ORIGINAL FOREST OFFICER  
DUAR WATERSHED DIVISION  
ABBOTTABAD



56

روزنامہ امتحان  
 کی جانب سے سامنے آنے والی حالات پر سربراہان کی  
 نے توجہ سے ملاحظہ کیا اور انہیں مطلع کیا کہ انہوں نے  
 کی طرف سے کوئی بھی ایسی چیز نہیں ہے اور سرکاری  
 کے بارے میں کوئی بھی ایسی چیز نہیں ہے اور سرکاری  
 جس پر لکھنؤ کے ساتھ انہوں نے آئندہ 2017 تک کام  
 عمل کر کے سامنے آئے اور کام کے دوران حفاظتی ٹیکٹ  
 کے لیے کوئی بھی ایسی چیز نہیں ہے اور سرکاری

روزنامہ امتحان  
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 عمل کر کے سامنے آئے اور کام کے دوران حفاظتی ٹیکٹ  
 کے لیے کوئی بھی ایسی چیز نہیں ہے اور سرکاری

### نوٹس غیر حاضری

برکھو آپ سنی زبان جان نائب کا صدر جو لیاں واٹر شپ ڈویژن ڈوڑ واٹر شپ ڈویژن  
 ایسٹ آباد سوری 29-09-2017 سے اپنی ذیوبنی سے غیر حاضری کے لیے  
 488/DHS سوری 27-09-2017  
 سوری 543 سوری 09-10-2017 اور سوری 670-73 سوری  
 سوری 25-10-2017 کے ذریعے آگاہ کی گیا کہ آپ ذیوبنی پر حاضر ہونے۔  
 آپ کے گھر کے پتہ پر پیشی نمبر 880 سوری 21-11-2017  
 آگاہی کی گئی کہ سات دن کے اندر اپنی ذیوبنی پر حاضر ہوں۔ لیکن چھٹی  
 پڑا عدم وصولی کی بنا پر واپس کر دی گئی۔ لہذا آپ کو نوٹس اشتہار ہذا کے ذریعے  
 مطلع کیا جاتا ہے کہ آپ چودہ دن کے اندر اپنی ذیوبنی پر حاضر ہو کر غیر حاضری کی  
 معقول وجہ بتائیں بصورت دیگر آپ کے خلاف E&D رولز 2011 کے تحت  
 یکطرفہ قانونی کارروائی عمل میں لائی جائے گی۔

روزنامہ امتحان  
 کی جانب سے سامنے آنے والی حالات پر سربراہان کی  
 نے توجہ سے ملاحظہ کیا اور انہیں مطلع کیا کہ انہوں نے  
 کی طرف سے کوئی بھی ایسی چیز نہیں ہے اور سرکاری  
 کے بارے میں کوئی بھی ایسی چیز نہیں ہے اور سرکاری  
 جس پر لکھنؤ کے ساتھ انہوں نے آئندہ 2017 تک کام  
 عمل کر کے سامنے آئے اور کام کے دوران حفاظتی ٹیکٹ  
 کے لیے کوئی بھی ایسی چیز نہیں ہے اور سرکاری

### ڈویژنل فارسٹ آفیسر

### ڈوڑ واٹر شپ ڈویژن ایسٹ آباد

Description	Last date for Purchasing of Tender Documents	Last date for submission of Documents
Supplementary Tender of New Mainline of Pipelines	Saturday 27-01-2018 02:00 PM	Monday 29-01-2018 11:00 AM
Supplementary Tender of Pipelines	Saturday 27-01-2018 02:00 PM	Monday 29-01-2018 11:00 AM
Supplementary Tender of Pipelines	Saturday 27-01-2018 02:00 PM	Monday 29-01-2018 11:00 AM
Supplementary Tender of Pipelines	Saturday 27-01-2018 02:00 PM	Monday 29-01-2018 11:00 AM
Supplementary Tender of Pipelines	Saturday 27-01-2018 02:00 PM	Monday 29-01-2018 11:00 AM
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روزنامہ امتحان  
 کی جانب سے سامنے آنے والی حالات پر سربراہان کی  
 نے توجہ سے ملاحظہ کیا اور انہیں مطلع کیا کہ انہوں نے  
 کی طرف سے کوئی بھی ایسی چیز نہیں ہے اور سرکاری  
 کے بارے میں کوئی بھی ایسی چیز نہیں ہے اور سرکاری  
 جس پر لکھنؤ کے ساتھ انہوں نے آئندہ 2017 تک کام  
 عمل کر کے سامنے آئے اور کام کے دوران حفاظتی ٹیکٹ  
 کے لیے کوئی بھی ایسی چیز نہیں ہے اور سرکاری

Divisional Forest Officer  
 Quara Watershed Division  
 Abbottabad

Divisional Forest Officer  
 Quara Watershed Division  
 Abbottabad

(7)  
Annex-H

تفتیش ہے۔۔۔ (5)



مادہ بندی ٹریک پولیس کی حالیہ ڈیوٹی کے دوران ایک ٹریک پولیس میں سیکل کے

مقبوضہ کشمیر میں نو جوانوں کی شہادت پر اسلام آباد

شہداء جہان کی نماز جنازہ میں ہزاروں افراد کی شمولیت تمام کی

سربراہ (ایم این آئی) ضلع کشمیر میں ہماری شہادت پر ان کے خونیوں کے انہوں کشمیری نو جوانوں نے زور دیا اور زبردست مظاہرہ کیا۔ انہوں نے شہادت پر اسلام آباد اور کوٹاکام کے مظاہرین کے اطلاع میں مکمل پڑھائی کی گئی تمام کانٹا اور کاروباری جس کے نتیجے میں پندرہ سڑکوں پر ٹریک سٹاپ کی گئی۔ کشمیر سے نالہ احمد اور سٹیٹ بکس کے مطابق نو جوانوں نے زور دیا اور کوٹاکام کے علاقے گڑگڑ میں ہی کے دوران ہمارے اور علاقے کوٹاکام کی کارروائی کے دوران شہید کیا گیا۔ نو جوان کی

## نوٹس غیر حاضری

برگاد آپ کسی زوران جان نائب تاحصہ حویلیاں واٹر شیز راج روڈ واٹر شیز ڈویژن ایبٹ آباد مورخہ 29-9-2017 سے اپنی ڈیوٹی سے بغیر کسی اطلاع کے غیر حاضر ہیں۔ آپ کو بذریعہ چھٹی نمبر 488/DNB مورخہ 27-9-2017 نمبر 543 مورخہ 10-10-2017 اور نمبر 73-670 مورخہ 25-10-2017 کے ذریعے آگاہ کیا گیا کہ آپ اپنی ڈیوٹی پر حاضر ہوں لیکن آپ کی طرف سے کوئی جواب موصول نہیں ہوا اور نہ ہی آپ اپنی ڈیوٹی پر حاضر ہوئے۔ آپ کے گھر کے پتے پر چھٹی نمبر 880 مورخہ 21-11-2017 بھیجی گئی اور ہدایت کی گئی کہ سات دن کے اندر اپنی ڈیوٹی پر حاضر ہوں لیکن چھٹی نمبر عدم وصول کی بناء پر واپس کر دی گئی۔ لہذا آپ کو نوٹس اشتہار ہذا کے ذریعے مطلع کیا جاتا ہے کہ آپ 14 دن کے اندر اپنی ڈیوٹی پر حاضر ہو کر اپنی غیر حاضری کی معقول وجہ بتائیں بصورت دیگر آپ کی خلاف EID روز 2011 کے تحت یکطرفہ قانونی کارروائی عمل میں لاکر مازمت سے درخواست کر دیا جائیگا۔ (INFIA7)

**DIVISIONAL FOREST OFFICER  
DUAR WATERSHED DIVISION ABBOTTABAD**

## پاکستان اسپورٹس بورڈ



### پیشکشیں مطلوب ہیں

- پاکستان اسپورٹس بورڈ کا اسلام آباد میں اسپورٹس بورڈ کی نوٹس کے تمام کیلئے کنسلٹنٹ اسپورٹس بورڈ کی خدمات دینا ہیں
- (1) پاکستان اسپورٹس بورڈ (پی ایس بی) کو اسلام آباد میں اسپورٹس بورڈ کی نوٹس کے تمام کیلئے کنسلٹنٹ اسپورٹس بورڈ کی خدمات دینا ہیں۔ کنسلٹنٹ اسپورٹس بورڈ کی خدمات کے ساتھ رجسٹریشن، فیڈرل بورڈ آف ریویو کی ایکٹیوٹیز، میٹرز پر سوسائٹیوں کی نوٹس کیلئے بین الاقوامی اداروں کے ساتھ الحاق کے طریقے متعلقہ شعبے میں ایک ایک انفراسٹرکچر اور PC-A کی تیاری کا عمل رکھتے ہوں اپنے پوزل اشتہار ہذا کی اشاعت کے 15 یوم کے اندر سبمہر لگانوں میں اور
  - (2) پاکستان اسپورٹس بورڈ کے ساتھ رجسٹرڈ خواہشمند کنسلٹنٹ اسپورٹس بورڈ کی خدمات دینا ہیں۔ اسلواٹ فراہم کرنا ہیں۔
    - (i) ذمہ دار جنرل پتہ، ٹیلی فون اور فیکس نمبر
    - (ii) فرم کے تمام کی تاریخ
    - (iii) جن 2018 تک PEC کے ساتھ رجسٹریشن کا سرٹیفکیٹ
    - (iv) جنرل بلانگس رجسٹریشن سرٹیفکیٹ
    - (v) کسی سرکاری انہم سرکاری انہم ادارے کے ساتھ الحاق اندراج کی سرٹیفکیٹ
    - (vi) گزشتہ پانچ سال کی آڈٹ شدہ سٹیٹمنٹ مالی استحکام کا سرٹیفکیٹ
    - (vii) مکمل کردہ اور کی تفصیل مع طلب ناموں میں بحال کے سرٹیفکیٹس
    - (viii) ہاتھ میں موجود کاسوں کی تفصیل
    - (ix) فرم کے زبردستی مشینری انویسٹمنٹس کی فہرست
    - (x) انجینئرنگ سٹاف اہم انفرانٹرا سٹرکچر ڈیٹا وغیرہ
    - (xi) ایسی میں کسی بھی ڈیپارٹمنٹ کی جانب سے بلیک لسٹ نہ ہونے کا بیان ملتی
  - (3) مزید کوئی بھی وضاحت، اگر دفتر زبردستی سے اوقات کار کے دوران حاصل کی جا سکتی ہے۔ مقررہ تاریخ کے بعد موصول پوزل ڈیوٹیوں کے لئے
  - (4) پیشکشوں پر نوٹس عمل پری پوزل بریفنگ کا انعقاد کیا جائے گا۔
  - (5) ڈائریکٹر جنرل پاکستان اسپورٹس بورڈ (PPRA) روز کے مطابق باا اظہار و جہوش کی بھی پیشکش پر پوزل کی منظور ہستہ کرنے کے باقی منظور کے

**پاکستان اسپورٹس بورڈ، کشمیر ہائی وی، آبیارہ، اسلام آباد**  
 فون: 051-9249001

Attested  
  
 [Signature]  
**DIVISIONAL FOREST OFFICER  
DUAR WATERSHED DIVISION  
ABBOTTABAD**

58

# Annex-I

1

OFFICE ORDER NO. 34 DATED ABBOTTABAD THE 05 <sup>3</sup> /02/2018 ISSUED BY  
MR. MR. TAIMUR ILYAS DIVISIONAL FOREST OFFICER DAUR WATERSHED DIVISION,  
ABBOTTABAD.

Mr. Zawan Jan Naib Qasid was transferred to Unhar Watershed Division, Mansehra vide Conservator of Forests Watershed Management Circle, Abbottabad office order No.26 dated 30.3.2017 against the vacant post of Naib Qasid and the same has been endorsed to the incumbent vide No.1271/DWS dated 4.4.2017 with the direction to report his arrival at new place of duty. The official was relieved on 1.7.2017 and reported his arrival on same date in the office of DFO Unhar Watershed Division Mansehra.

The Divisional Forest Officer Unhar Watershed Division referred back the case with the remarks that "the official is physically and mentally crippled man who cannot properly hear, speak and too feeble even to walk without the support of his accompanying son". In the meanwhile, the transfer order No.26 dated 4.8.2017 has been cancelled by the Conservator of Forests Watershed-Management Circle Abbottabad.

The DFO Daur Watershed Division has directed the official vide letter No.488/DWS dated 27.9.2017 that in the light of remarks passed by the DFO Unhar Watershed Division this office is unable to continue the pay and allowance till production of fitness certificate issued by the Medical Board, and he may be produced it otherwise payment of pay and allowances will not be made to him.

Consequently the official taken casual leave for 4 days on 29.9.2017 but he failed to rejoin his duty up to 3.10.2017. Resultantly, the Range Officer reported his absence to this office for appropriate action. The explanation was called vide No.544/DWS dated 9.10.2017 and Mr. Zawan Jan Naib Qasid was directed to join his duty and to justify the unlawful absence within 7 days otherwise exparte action will be taken against him. The Range Officer tried to contact him telephonically and use all available sources for communication but in vain.

In view of non responding by the delinquent official the then DFO Daur Watershed Division issued charge sheet to the accused vide No.670-73/DWS, dated 25.10.2017 and assigned the enquiry to Mr. Muhammad Ashraf Superintendent along-with enquiry file to deal the matter appropriately but the enquiry officer returned the enquiry with the remarks that in existence of comments passed by the DFO Unhar Watershed Division Mansehra no departmental enquiry is required rather consider the case for his retirement.

Taking lenient view this office served a notice for resumption of his duty within 7 days vide No.880/DWS dated 21.11.2017 through register cover at his home address but the same is received back undelivered. Finally a notice of absence was published in local leading news papers dated 11.1.2018 in which he had been directed to resume his duty within fourteen (14) days but the official disregarded the directives of higher officer.

*Ashraf*  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

Attested

*Taimur Ilyas*  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

# Annex-I

59

Annex-I P file

In view of above circumstances the undersigned being authority reach at the conclusion that Mr.Zawan Naib Qasid is not willing to join his duty and also feeble and have mentally ailing condition.

Therefore, as provided Under Section-9 of Khyber Pakhtunkhwa Efficiency and Discipline Rules,2011, the incumbent is hereby awarded major penalty of compulsory retirement with effect from the date of his absence i.e.29.9.2017 from his service in the interest of public service.

Sd/- (TAIMUR ILYAS)  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD.

No. \_\_\_\_\_ /

Copy forwarded to:-

1. The Conservator of Forests, Watershed Management Circle, Abbottabad.
2. The Budget & Accounts Officer Govt. of Khyber Pakhtunkhwa Environment Department, Peshawar.
3. The Range Officer Watershed Range Havelian for information.
4. I/C Establishment Branch Daur Watershed Division, Abbottabad for information and immediate necessary action.
5. Mr.Zawan Jan Mali/NQ for information.

A Harv

DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

Attested


DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD



61

Annex - K  
18

79

<p><b>Javed Arshad</b> Conservator of Forests</p>		<p>Office of the Conservator of Forests Watershed Management Circle Jail Road Abbottabad Phone No. 0992 9310304 Fax No. 0992 9310303</p>
<p>No. <u>7033</u> /appeal</p>		<p>Dated Abbottabad the <u>18</u> /5/2018</p>

Mr. Zawan Jan Mali (Rtd)  
Village damrai PO Banna Allai  
District Battagram.

*[Handwritten signature]*  
E

Subject: APPEAL AGAINST OFFICE ORDER NO.34 DATED 5/3/2018.

Reference your application dated 23/3/2018 received on 29/3/2018

The DFO Daur Watershed Division Abbottabad vide his letter No.1961/A-B dated 11/5/2018 has reported that you have given full opportunity to save your service but you could not avail the chance, due to which the action were taken after fulfillment of the all codel formalities under the provision of rules by the competent authority.

Hence, your appeal cannot be considered at this stage and has politely been rejected.

Conservator of Forests  
Watershed Management Circle  
Abbottabad.

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No.        /appeal

Copy forwarded to DFO Daur Watershed Division Abbottabad for information with reference to his letter cited above.

Conservator of Forests  
Watershed Management Circle  
Abbottabad.

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DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

MS.Khan/Genera/G in L:Top

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Attested  
DIVISIONAL FOREST OFFICER  
DAUR WATERSHED DIVISION  
ABBOTTABAD

Provided that dismissal in these cases shall be with immediate effect from the date of conviction by a court of law; and

- (b) proceed against the Government servant under rule 5, where he has been convicted of charges other than corruption or moral turpitude.

**9. Procedure in case of wilful absence.**—Notwithstanding anything to the contrary contained in these rules, in case of wilful absence from duty by a Government servant for seven or more days, a notice shall be issued by the competent authority through registered acknowledgement on his home address directing him to resume duty within fifteen days of issuance of the notice. If the same is received back as undelivered or no response is received from the absentee within stipulated time, a notice shall be published in at least two leading newspapers directing him to resume duty within fifteen days of the publication of that notice, failing which an *ex-parte* decision shall be taken against the absentee. On expiry of the stipulated period given in the notice, major penalty of removal from service may be imposed upon such Government servant.

**10. Procedure to be followed by competent authority where inquiry is necessary.**—(1) If the competent authority decides that it is necessary to hold an inquiry against the accused under rule 5, it shall pass an order of inquiry in writing, which shall include:

- (a) appointment of an inquiry officer or an inquiry committee, provided that the inquiry officer or the inquiry committee, as the case may be, shall be of a rank senior to the accused and where two or more accused are proceeded against jointly, the inquiry officer or the convener of the inquiry committee shall be of a rank senior to the senior-most accused;

*Admitted*

- (b) the grounds for proceeding, clearly specifying the charges along with apportionment of responsibility;

- (c) appointment of the departmental representative by designation; and

*Divisional Forest Officer  
Quar Watershed Division  
Abbottabad*

direction to the accused to submit written defense to the inquiry officer or the inquiry committee, as the case may be, within reasonable time which shall not be less than seven days and more than fifteen days of the date of receipt of orders.

(2) The record of the case and the list of witnesses, if any, shall be communicated to the inquiry officer or the inquiry committee, as the case may be, along with the orders of inquiry.

(3) In a case where preliminary or fact finding inquiry was conducted, and the competent authority decides to hold formal inquiry, the inquiry officer or the inquiry committee for the purpose of conducting formal inquiry shall be different from the inquiry officer or the inquiry committee which conducted the preliminary enquiry.

**11. Procedure to be followed by inquiry officer or inquiry committee.**—

- (1) On receipt of reply of the accused or on expiry of the stipulated period, if no reply is

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QUAR WATERSHED DIVISION  
ABBOTTABAD



# Annex - M

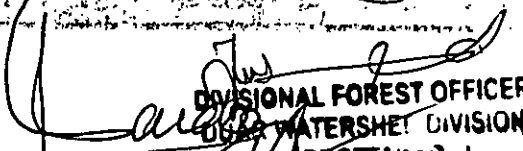
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each through cheque No. 335389 dated 25/11/17  
detail as under:-

Sl. No.	Rank	Name	Pay	HRA	CA	WA	DA	Int. Allow	MA	ARA 2013 5%	UAA	ARA 2015 2.5%	ARA 2016 10%	AR 2017	TCO
1	Key	Tarid Arshad	95810	5904	4688	500	2275	1526	8509	9581	-	121			
3	3	Abdullah Rehman	84185	3873	3770	-	2050	1380	7029	8419	-	116			
4	4	M. Ashraf Supal	58670	2955	2490	-	1340	906	4667	5867	5000	73			
5	5	Baqar Khan Asst	40120	1751	-	980	659	3547	4112	-	513				
			275785	12732	12719	500	6645	1171	23552	21579	5000	328			

Sl. No.	Name & Rank	A/C No.	pay	L/Salary	HRA	CA	WA	DA	Int. Allow	MA	ARA 2013 5%	UAA	ARA 2015 2.5%	ARA 2016 10%	AR 2017	TCO
1	Muhammad Sarwar	4132888210	45600	0	1476	2856	0	0	0	1500	1102	0	733	3845	4560	3
2	Afsan Steno		15000	0	0	0	0	0	0	0	0	0	0	0	0	0
3	Muhammad Shamraiz Assistant		38605	0	0	5000	0	0	0	1751	888	0	594	3252	3860	3
4	Muhammad Arshad S/C	23950-3	33900	0	0	0	0	0	0	1500	790	0	526	2840	3390	4
5	Mrs Shahana Tabassam J/C		13450	0	1234	2856	0	0	0	1500	427	0	214	1126	1345	-
6	Muhammad Dad J/C	24049-4	33690	0	1234	2856	0	0	0	1500	836	0	556	2827	3369	4
7	Muhammad Hussain Shah J/C		17850	0	1234	2856	0	0	0	1500	425	0	288	1493	1785	2
8	Muhammad Hussain Shah J/C		25770	0	1234	2856	0	0	0	1500	629	0	422	2161	2577	3
9	Muhammad Aseeb J/C	4139733534	12570	0	1234	2856	0	0	0	1500	629	0	314	1051	1257	2
10	Muhammad Hamayun Driver		18455	0	1029	1785	100	0	0	1500	433	0	303	1548	1845	2
11	Muhammad Usar Ahmad Driver		23690	0	1059	1785	100	0	0	1500	569	0	395	1993	2369	2
12	Muhammad Farid Driver	17257-4	12855	0	1029	1785	100	0	0	1500	283	0	209	1078	1285	2
13	Muhammad Saikat Ali Driver	17462-5	12855	0	1029	1785	100	0	0	1500	280	0	207	1078	1285	2
14	Muhammad Aurangzeb NO	30257-8	22660	0	972	1785	0	0	300	1500	552	0	378	1901	2266	2
15	Muhammad Mohd Miskeen NO	31896-3	22660	0	972	1785	0	0	300	1500	552	0	378	1901	2266	2
16	Muhammad S Maqsood Shah NO	26811-5	22660	0	0	0	0	0	300	1500	553	0	378	1901	2266	2
17	Muhammad Fida Hussain NO	32571-3	21780	0	972	1785	0	0	300	1500	517	0	348	1811	2178	2
18	Muhammad Abdur Razaq NO	21997-2	20900	0	972	1785	0	0	300	1500	508	0	348	1753	2090	2
19	Muhammad Mohd Javed NO	24010-9	21340	0	972	1785	0	0	300	1500	500	0	341	1773	2134	2
20	Muhammad Sadaqat Ali NO	17302-9	11535	0	942	1785	0	0	300	1500	270	0	189	967	1154	2
21	Muhammad Muhammad Shahzad NO	173323	11535	0	0	0	0	0	300	1500	270	0	189	967	1154	2
22	Muhammad Munsif D/Runner	17349-4	20460	0	972	1785	100	100	0	1500	500	0	341	1716	2046	2
23	Muhammad Zawan Jan Mali	32421-5	20900	0	972	1785	100	100	0	1500	508	0	348	1753	2090	2
24	Muhammad Yasir Mehmood Mali	17328-9	11150	0	942	1785	100	100	0	1500	247	0	176	932	1115	2
25	Muhammad Abdul Hakim Chow.	32535-8	20900	0	0	0	100	100	0	1500	517	0	348	1753	2090	2

Attested

  
 DIVISIONAL FOREST OFFICER  
 QUAR WATERSHED DIVISION  
 ABBOTTABAD

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Divisional Forest Officer  
Daur Wateeshed Division  
Abbottabad.

11/11/01

(34)

Annex - N

GOVERNMENT OF NWFP  
FINANCE DEPARTMENT  
(REGULATION WING)

Annex - N

SUBJECT: - LEAVE ENCASHMENT ALLOWANCE

Will the Budget & Account Officer (Environment) Government of NWFP, Environment Department please refer to his Memo No. B&A/Pen-General/5019, dated 29.06.2002 on the subject noted above?

Administrative Department is advised that since in terms of S&G Department's letter No. SOR-I(S&GAD)1-46/80 dated 30.06.1988, the LPR is not admissible to a Government Servant compulsorily retired, as a measure of punishment under provisions of NWFP Government Servants (E&D) Rules, 1973, therefore the question of encashment of LPR in their case does not arise.

*[Handwritten notes]*

*[Signature]*  
(SIRASUL HAQ) 577  
SECTION OFFICER (FR)

THE BUDGET & ACCOUNTS OFFICER (Environment),  
GOVERNMENT OF NWFP, ENVIRONMENT DEPARTMENT

U.O. NO. SO (FR) / FD / 5-92/88 / KC

Dated Peshawar, the 05.07.02

*[Signature]*  
Divisional Forest Officer  
Buar Watershed Division  
Abbottabad

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Attested

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DIVISIONAL FOREST OFFICER  
BUAR WATERSHED DIVISION  
ABBOTTABAD