


FORM OF ORDER SHEET

Court of _____

Appeal No. 1250/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/8/2024	<p>The appeal of Mr. Jahan Zeb presented today by Mr. Shahzada Irfan Zia Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 9/9/2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. _____/2024

Jahan Zaib

V/S

Province of KPK

APPLICATION FOR FIXING THE INSTANT APPEAL
AT PRINCIPLE SEAT AT PESHAWAR.

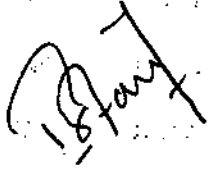
RESPECTFULLY SHEWETH:

1. That the appellant has filed the instant appeal in this Honorable Service Tribunal against the order dated 30.03.2024, whereby three minor increments have been stopped.
2. That instant appeal is in the jurisdiction of Camp Court Swat of this Honorable Tribunal, but the appellant engaged counsel who is doing legal practice at Peshawar and the appellant also wants to peruse his case at principle seat at Peshawar.
3. That it will be convenient for the appellant as well as for his counsel if the instant appeal is fix at principle seat at Peshawar.

It is therefore most humbly prayed that on the acceptance of this application, the instant appeal may kindly be fixed at principle seat at Peshawar of this Honorable Tribunal.

Dated 05.09.2024

APPELLANT
THROUGH:


SHAHZADA IRFAN ZIA
ADVOCATE PESHAWAR
CELL NO. 0300-9345297

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Jahan Zeb vs Province of KPK etc

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>Shahzada Irfan Zia</u>	<u>Adv</u>	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?		✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____		✓
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____		✓
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		✓

N/A

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Shahzada Irfan Zia Adv

Signature: [Signature]

Date: 28/8/2024.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 1250 of 2024

Jahan Zaib Forest Guard /Block Officer Mirkhani /
Domel Block, Chitral Forest Division, Chitral.

..... Appellant

VERSUS

1. The Province of KPK through Chief Conservator of Forests Malakand Forest Region-III Saidu Sharif Swat.
2. The Conservator of Forests Malakand West Forest Circle at Timegara.
3. Divisional Forest Officer Chitral Forest Division Chitral.


..... Respondents

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11.	Wakalat Nama		

جہان زیب
Appellant

Through


Shahzada Irfan Zia
Advocate, Peshawar
Cell No. 0300-9345297

✓

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

Appeal No. 1250 of 2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15230

Dated 28/8/24

Jahan Zaib Forest Guard /Block Officer Mirkhani /
Domel Block, Chitral Forest Division, Chitral.

..... Appellant

VERSUS

1. The Province of KPK through Chief Conservator of Forests Malakand Forest Region-III Saidu Sharif Swat.
2. The Conservator of Forests Malakand West Forest Circle at Timegara.
3. Divisional Forest Officer Chitral Forest Division Chitral.

Filed to-day
Registrar
28/8/24

..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE
TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED
ORDER DATED 30/11/2023 PASSED BY RESPONDENT NO
3 WHEREBY THE APPELLANT HAS BEEN AWARDED
THE MINOR PENALTY OF WITHHOLDING OF THREE
ANNUAL INCREMENTS WITHOUT ACCUMULATIVE
EFFECT DUE ON 01.12.2023, 01.12.2024, 01.12.2025 AND
THE DEPARTMENTAL APPEAL OF THE APPELLANT
AGAINST THE IMPUGNED ORDER ELECITED NO
RESPONSE WITH IN THE STATUTORY PERIOD.**

2/

Respectfully Sheweth:

FACTS OF THE CASE

The appellant respectfully submits as under:

- 1) That the succinct facts of the case are that on the direction of respondent No. 2 a preliminary inquiry was initiated about the damages in serigal forest compartments of Drosh South Forest Sub Division. As a result of this preliminary inquiry a Show Cause Notice was served upon the appellant wherein certain allegations were levelled against him. **(Annexure-A & B).**
- 2) That the appellant submitted his reply to the Show Cause Notice and vindicated his plea and position. The appellant submitted a graphic account of each and every fact but no one put any premium on his submission. **(Annexure-C).**
- 3) That on 30.11.2023 the respondent No 3 passed the impugned order whereby he awarded the minor penalty of withholding of three annual increments without accumulative effect due on 01.12.2023, 01.12.2024, 01.12.2025. feeling aggrieved from the impugned order ibid, the appellant approached respondent No 2 through his Departmental appeal dated 25.12.2023 sent by TCS Service, but due to negligence of the said courier service the Departmental appeal was communicated to the office of Respondent No 2

with some delay therefore the same was rejected by the authority being time barred, but due to intervention of the respondent No 1 the Departmental appeal of the appellant was again considered by respondent No 2 and comments were called from respondent No 3 which was never sent by the authority to respondent No 2 till date. (Annexure-D, E & F). Hence the present appeal is being filed inter alia on the following grounds.

GROUND:

A. That the alleged charges against the appellant pertains to the Mirkhani / Domel Block from where the appellant was transferred on 07.02.2023 and he handed over the charge to Mr. Mumtaz Ali Shah. At the time of his transfer a proper charge note was written regarding the said range by the appellant with Mr Mumtaz Ali Shah after proper survey of the area, to whom the charge was handed over by the appellant and according to charge note no damage was found. The damage alleged does not pertain to the period of the appellant. It is worth to mention here that on 24.03.2023 the appellant was again posted as Block Officer of Mirkhani Block and the said Mumtaz Ali Shah was transferred due to his inefficiency and corrupt practices, as the damage was relate to his tenure. (Annexure G & H).

B. That as per instructions of the Government of KPK provided in various circulars, it is the

mandatory duty of both relieved and relieving officials to properly check the Forest jointly at the time of transfer of charge and it should be certified at the charge report. That all Forests and Plantations etc have been thoroughly checked and no damage exists in the Forests. This requirement should be completed within a week time and in case some damage exists, it should be listed and signed by both the officials. In case this prerequisite has not been fulfilled then the responsibility will rest with the relieving officers. That the appellant has written a proper charge note and he has fulfilled the required instructions at the time of his transfer. **(Annexure-I)**.

C. That before passing the impugned order no regular inquiry was conducted against the appellant and no opportunity of cross-examination was given to the appellant to impeach the credibility of the prosecution witnesses. It is astonishing that neither the complainant was examined nor opportunity was given to the appellant to cross examine the complainant.

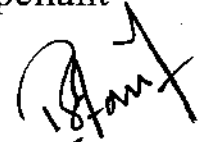
D. That the appellant seeks the permission of this learned Tribunal to raise additional grounds at time of arguments.

In view of the aforesaid facts and circumstances of the case it is humbly prayed that the impugned order dated 30.11.2023 may graciously be set aside

being illegal and void, directing the respondents to restore the increments of the appellant with all back benefits.

Any other relief which this august tribunal deems fit that may also onward granted in favor of appellant.

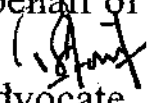
جہانزیب
Appellant

Through 

Shahzada Irfan Zia
Advocate, Peshawar
Cell No. 0300-9345297

Certificate

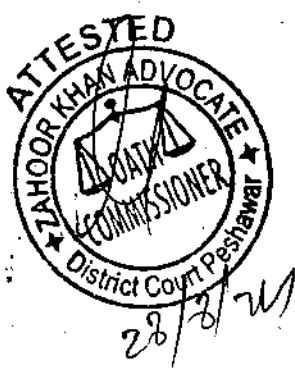
Certified that no such service appeal earlier been filed on behalf of appellant before this Tribunal on the subject matter.


Advocate

AFFIDAVIT

I, Jahan Zaib Forest Guard /Block Officer Mirkhani / Domel Block, Chitral Forest Division, Chitral do hereby solemnly affirm and declare on oath that the content of the above appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret and concealed from this Hon'ble Tribunal.

جہانزیب
DEPONENT



6

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

Appeal No. _____ of 2024

Jahan Zaib **VERSUS** The Province of KPK

**APPLICATION FOR CONDONATION OF DELAY IN
FILING OF APPEAL IF ANY.**


Respectfully Sheweth:

- 1) That the instant appeal has been filed before this Hon' able Tribunal in which no date has yet been fixed.
- 2) That the appellant filed his Departmental appeal which was within time and on his Departmental appeal comments were called from respondent No 3 which he never sent to the respondent No 2 till date the matter was under consideration within the department and the appellant was looking for its final conclusion / result, therefore some delay occurred in filing this appeal.
- 3) That the delay in filing the appeal is not deliberate or intentional but due to ignorance of relevant rules and lethargic attitude of the respondents. The superior courts always direct decision of the cases on merits.

It is, therefore, humbly prayed that on acceptance of this application the delay if any in filing of appeal may kindly be condoned in the interest of justice.

جہان زیب
Appellant

Through


Shahzada Irfan Zia
Advocate, Peshawar
Cell No. 0300-9345297

AFFIDAVIT

I Jahan Zeb, Forest Guard, do hereby declare on oath that the contents of this application are true and correct.

جہان زیب
Deponent



(Annex: A) (7)

<p>SUB-DIVISIONAL FOREST OFFICER CHITRAL FOREST SUB-DIVISION CHITRAL</p>		<p>NEAR CHEW BRIDGE DANIN</p>
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To

The Divisional Forest Officer,
Chitral Forest Division
Chitral.

Subject: - INQUIRY REPORT REGARDING ILLICIT CUTTING IN SERIGAL FORESTS.
Memo: Reference your office Order No.97 dated 20/03/2023.

Enclosed find herewith the inquiry report regarding the illicit cutting in Serigal Forests of Arandu for further necessary action, please.

main
Sub-Divisional Forest Officer,
Chitral Forest Sub-Division,
Chitral. 30-5-2023

ASSA.
Put up for action. Put up Show Cause
NOTICE
04/23
05/2023

Attended.
10/

DETAIL REPORT REGARDING ILLICIT CUTTING AND INSPECTION OF SERIGAL FOREST.

1. BACKGROUND:

In compliance to the office Order No.97 dated 20/03/2023 the committee constituted by DFO Chitral inspected the compartments of Serigal Forest.

The committee members were divided in to three sub groups for inspection of the said forest. The group-A checked compartment No. 02 headed by Deputy Ranger Mr.Aziz Wail, group-B was headed by SDFO Mr.Umalr Nawaz checked Compartment No. 03 while group-C headed by Deputy Ranger Mr. Muhammad Alamgir checked compartment No.4.

2. FINDINGS:

The detailed findings of the committee/sub-groups are below.

1. In compartment No. 02 total 48 No of deodar trees were illicitly cut down out of which 22 numbers of converted logs having different sizes were found and fifteen numbers of converted scants were found on the spot (sizewara/list attached). The rest illegally cut trees are lying on the spot. Beside this 21 No of trees were marked and harvested under local quota permits for the year 2023 in the said compartment which are not converted, transported and lying in the said compartment (list attached).
2. In Compartment No.03 total five No of deodar trees were illicitly cut, out of which 18 number of logs and 9 No of scants having different sizes were found lying in the said compartment (sizewara/list attached). Beside this 10 No of deodar Trees were marked and cut under local quota permits for the year 2023, which are not converted, transported and lying in the said compartment.
3. In Compartment No. 4 total 07 number of deodar trees were illicitly felled by the offenders, out of which 17 number of scants were found on the spot. (sizewara/list attached). Beside this 06 No of local Quota permits have been marked and harvested under local quota permit for the year 2023 which need to be converted, transported as lying in the said compartment.

S.#	Compt. No	Damage Report Chalked #	Permit Issued #	Total #	Remarks
1	Serigal .02	1. 932/10 dated 26/02/2023 2. 934/10 dated 19/03/2023 3. 935/10 dated 20/03/2023 4. 936/10 dated 21/03/2023	21	49 No trees illicitly felled and 21 No of trees felled under local quota	22 No of converted logs and 15 No scants lying in the said Comptt.
2	Serigal .03	1. 931/10 dated 08/12/2022	12	Total trees illicitly felled are 08 and 12 Nos felled under local quota.	18 Nos converted logs and 09 No numbers of scants lying in the said compartment
3	Serigal .04	1. 933/10 dated 28/02/2023	08	Total trees illicitly felled 07 and 08 No. felled under local quota.	17 No of scants lying in the said Compartment.

Beside this Serigal Forest Compartments No.01, 05, 06, 07 were randomly checked no fresh cuttings detected rather old stumps present which community re-cut for firewood purpose.

2. RECOMMENDATIONS:

The following recommendations are recommended which should be considered in time for better conservancy of forest:

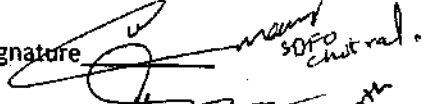
1. Block officer Mr. Mumtaz Ali Shah and Beat Guard Mr. Barakat Ullah FG never bothered to visit their forest compartments. They have marked trees under local quota and left the forest at the mercy of wood cutters and smugglers which lead to huge damages in the area only because of their in-efficiency, lethargic attitude and corrupt nature toward performance of highly important task assigned to them so strictly disciplinary action against both these recommended. the concern staffs i.e. Block officer and Beat Guard of Serigal are in-efficient enough through they have chalked down damage reports against the offenders but they have not bothered to peruse the case properly in time e.g. visit to the area preparation of challans, arrest of forest offenders, taking into safe custody of illicitly cut timber etc. they have not informed the higher ups/ immediate officers well in time about the damage which has resultantly increased in intensity and frequency with time to time. Simply they have taken it as routine activity.
2. It is pertinent to mention that the predecessor BO Mr. Jithanzeb is equally responsible as the damages detected and observed during committee visit revealed that most of the damages were done before snowfall and permit contractor were allowed to fell trees at their own will. The BO never bothered to visit the site nor chalked any damage report against the offenders in Serigal Forest compartment, in fact the matter was concealed and kept secret from SDFO Drash, South as well as the newly deputed Block Officer. It seems that the trend of local forestry where the timber is harvested from other compartments instead of properly marking and managing under the rules in the forest compartment specified for local quota has been maintained for personal gains by the BO concerned.

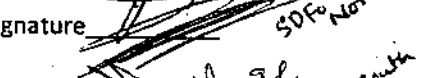
Attested.
[Signature]


3. It is worth mentioning that fresh trees which are illicitly felled have been marked with Damage Report numbers on the stumps with inked marker. No stumps carving (KUDAN) has been done; so there is chance of washing out of the ink due to rainfall and other weather conditions. Similarly, the trees marked under local quota are not properly stump cut (KUDAN). This shows the inefficiency of the concerned field staff. Similarly, the timber which are in form of logs and scants are lying in scattered form in the forest and prone to theft, fire or flood just given on superdari. This shows the inefficiency of the concerned field staff that legal and illegal timber both are not separated from each other and there is chance of intermixing and theft. This will create problem for transparent exploitation of the timber.
4. Both the officials were unable to properly seize or transported the logs, scants after chalking damage report rather shifted the burden on sub Divisional and Divisional office to convene Jirga and to satisfy offenders for possession of timber which clearly speak of their inefficiency and involvement with smugglers. The illicitly cut fresh trees/logs/scants need proper extraction from the said forest as soon as possible to avoid any unexpected loss in form of fire, flood, theft etc.
5. An immediate transfer of both the staff and transfer of competent forester and FG to the area the SDFO needs to be visited the forest regularly besides motivation of forest staff and mobilization of community to form social group i.e. FPCC and VDC. Furthermore, the Relieving Block officer should take proper handing taking from the Relieved Block officer and report if any unattended offence in time.
6. It is astonishing that Divisional Raid Party being equipped and approved from the competent forum is available and they also have not visited and informed the higher ups about the said offence of huge nature rather they focus on petty nature offences in the main city. It is suggested that the raid party officials must visit the South Forest Sub Division especially Arandu area once a week being a critical area in term of forest resources and protection issues.
7. It is observed that Serigal Forest compartment have been a major headache to forest Department as well as District Administration in the past, the history revealed that forest officers having limited resources unable to protect dealing with Stubborn Community who have challenged Writ of Government and created law and order issues. So it is recommended to approach Deputy Commissioner to issue 3MPO and depute levy force with forest officers to protect joint forest resource, similarly the litigation cases in the court with minimum penalties be discouraged to safeguard forest and forest conservancy matter. The SDFO South may be directed to properly peruse the prosecution cases against the offenders till the logical end.
8. Action against BO Arandu and Beat Guard Arandu must be taken as mostly permit issued for Arandu are transported from Domel being in close vicinity and lower carriage expenses the SDFO south must look into matter personally and probe the issue for a better solution for future.
9. SDFO South may be directed to take help from LEAs to dismantle the temporary road approaching near to forest Compartment at Serigal Forest as well as to dismantle the temporary cattle houses constructed in Serigal forest being encroachment in protected forests.


Name and Signatures of Inquiry committee.


1. Mr. Umair Nawaz, SDFO Chitral Chairman Inquiry Committee.
2. Mr. Muhammad Younas, SDFO Drosli North Member
3. Mr. Muhammad Ishfaq, SDFO Drosli South Member
4. Mr. Muhammad Alamgir Khan D/Ranger Member
5. Mr. Aziz Wali, D/Ranger Member
6. Mr. Usman Khan, Forester Member

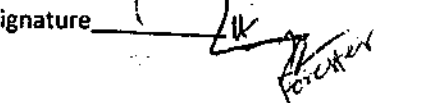
Signature  SDFO Chitral.

Signature  SDFO North

Signature  SDFO South

Signature 

Signature  BR

Signature  Forester

Dated: 29/05/2023

Attested.


SHOW CAUSE NOTICE

I, Asif Ali Shah, Divisional Forest Officer, Chitral Forest Division, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you, Mr. Jahan Zaib Forest Guard/ the then Incharge Mirkhani/Domel Block with this show cause notice as follows:

- i. That consequent upon sharing of pictures of forest damages in Serigal Forest Compartments of Drosh South Forest Sub Division by worthy Conservator of Forests, Malakand Forest Circle West at Timergara, an inquiry committee was constituted vide office order No.97, dated 20/03/2023.
- ii. That the Inquiry Committee submitted inquiry findings / recommendations, vide SDFO Chitral Forest Sub Division/ Chairman of the Committee vide his office letter No. Nil, dated 30.05.2023.
- iii. That you were not visiting Serigal Forest Compartments in your jurisdiction block as block officer Mirkhani/Domel regularly which leads illicit cutting and damages during your period.
- iv. You were unable to prevent commission of forest offences/ cutting at Serigal Forest Compartment Nos. 1-7 and remained ignorant of whole situation where trees have been illicitly cut with your active support.
- v. You were unable to properly mark trees under local quota as per rules, thus allowing local mafia to damage the forest at their wishes. Thus huge green cutting were detected as per detail enquiry report showing damage as under:-

S. #.	Comptt. No.	Damage reports chalked vide No. / Date	No. of Cut trees:	
			Under Local Quota	Illicitly cut trees
1	Serigal C.#.02	932, 934, 935 & 936/10 dated 26.2.2023, 19, 20 and 21.3.2023 respectively	21	49
2	Serigal C.#.03	931/10, dated 08.12.2022	12	08
3	Serigal C.#.04	933/10, dated 28.02.2023	08	07
Total:-			41	64

- vi. You while assigned duty of Block Officer Mirkhani Block is responsible as the damages detected and observed during committee visit revealed that most of the damages were done before snow-fall and permit contractors were allowed to fell trees in advance. You never bothered to visit the site nor chalked any damage report against the offenders in Serigal Forest Compartments and in fact the matter was concealed and kept secret from SDFO Drosh South as well as the newly deputed Block Officer.
- vii. You were allowing timber from your respective block illegally against local quota permits of Arandu which were supposed to be transported from Arandu Block under the rules for monetary benefits.

Attested
[Signature]

- viii. You were unable to ensure duty performance of Forest Guard as well as forest Neghban under your jurisdiction control leading to worst situation in Domel / Serigal beat regarding forest protection.
- ix. That you were called to explain vide his office letter No.5963-65/B&A, dated 02/06/2023 to explain your position.
- x. That you did not bother to submit your reply to the explanation, which shows that you have nothing to say in your defense.

2. On going through the findings and recommendations of the inquiry officer/inquiry committee, the material on record and other connected papers, I am satisfied that you have committed the following acts / omissions specified in rule 3 of the said rules:

- xi. Inefficiency.
- xii. Misconduct.
- xiii. Corruption.

- 3. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalties under rule 4 of the said rules.
- 4. You are, thereof, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- 5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.
- 6. A copy of the findings of the inquiry officer/inquiry committee is enclosed.

sdf
 Divisional Forest Officer,
 Chitral Forest Division,
 Chitral

No. 49298 /G, Dated Chitral the 27/07 /2023.
 Copy forwarded to the:-

- 1. Chief Conservator of Forests, Central Southern Forest Region-I, Peshawar.
- 2. Chief Conservator of Forests, Malakand Forest Region-III, Saidu Sharif Swat.
- 3. Conservator of Forests, Malakand Forest Circle West at Tinergara Lower Dir.
- 4. SDFO Drosh South Forest Sub Division for information and necessary action.

For favour of information, please.

- 5. Head Clerk / Accountant Divisional Forest Office Chitral for information.
- 6. Mr. Jahan Zaib Forest Guard the then Incharge Mirkhani Block C/o SDFO Drosh South for information & necessary action.
- 7. Personal / Inquiry file (s) for record.

[Signature]
 Divisional Forest Officer,
 Chitral Forest Division,
 Chitral

Attested
[Signature]

Accepted
187

P.F. 2 -

1. The first part of the document is a list of names and their corresponding amounts. The names are written in Urdu and the amounts are in numerical form. The list is as follows:

1. Mr. A. B. Khan	Rs. 1000
2. Mr. C. D. Khan	Rs. 500
3. Mr. E. F. Khan	Rs. 200
4. Mr. G. H. Khan	Rs. 100
5. Mr. I. J. Khan	Rs. 50
6. Mr. K. L. Khan	Rs. 25
7. Mr. M. N. Khan	Rs. 12
8. Mr. O. P. Khan	Rs. 6
9. Mr. Q. R. Khan	Rs. 3
10. Mr. S. T. Khan	Rs. 1

2. The second part of the document is a list of names and their corresponding amounts. The names are written in Urdu and the amounts are in numerical form. The list is as follows:

1. Mr. U. V. Khan	Rs. 1000
2. Mr. W. X. Khan	Rs. 500
3. Mr. Y. Z. Khan	Rs. 200
4. Mr. A. B. Khan	Rs. 100
5. Mr. C. D. Khan	Rs. 50
6. Mr. E. F. Khan	Rs. 25
7. Mr. G. H. Khan	Rs. 12
8. Mr. I. J. Khan	Rs. 6
9. Mr. K. L. Khan	Rs. 3
10. Mr. M. N. Khan	Rs. 1

187-10

27/07/03 492-98/15
 27/07/03

1. The first part of the document is a list of names and their corresponding amounts. The names are written in Urdu and the amounts are in numerical form. The list is as follows:

2. The second part of the document is a list of names and their corresponding amounts. The names are written in Urdu and the amounts are in numerical form. The list is as follows:

181
Atheist

Handwritten text in a cursive script, likely a letter or a journal entry. The text is dense and fills most of the page. It appears to be written in a language that is difficult to decipher, possibly a form of shorthand or a specific dialect. There are some numbers and symbols interspersed within the text, such as $\frac{7.03}{10}$, $\frac{6.03}{10}$, and $\frac{10}{10}$. The text is written in dark ink on a light-colored paper.

187
Alford

P. 10

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18
Attended

~~Handwritten signature~~
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OFFICE ORDER NO. 47 DATED CHITRAL THE 30/11/2023, ISSUED BY
MR. ASIF ALI SHAH, DIVISIONAL FOREST OFFICER, CHITRAL FOREST DIVISION, CHITRAL

Whereas Mr. Jahan Zeb Forest Guard, the then Incharge Mirkhani/Domei Block of Chitral Forest Division was proceeded against under Rule-3 the Government of Khyber Pakhtunkhwa (Efficiency & Discipline) Rules, 2011 for the charges as mentioned in the 'Show Cause Notice' issued vide this office No. 492-98/G, dated 27/7/2023, wherein the following charges were leveled against him:-

1. Inefficiency.
2. Misconduct.
3. Corruption.

Whereas, the accused Forest Guard submitted his reply to the Show Cause Notice dated 17/8/2023 and whereas the accused was called personal hearing to appear before the undersigned for personal hearing on 28/8/2023.


Whereas personal hearing was conducted on 28/8/2023 and whereas the reply of accused as well as reply in personal hearing stand unsatisfactory.

Whereas copies of written replies as well as personal hearings of the accused officials were sent to the SDFO Drosh South vide letter No. 1280/G, dated 19/9/2023 for his comments and to report the fact / figure after thoroughly analyzing their statements.

Whereas going through comments submitted by the SDFO Drosh South vide his office letter No. 153/SDFO-DS, dated 24/11/2023 it is understood that the accused official has omitted the charges leveled against him.

Now therefore, being competent authority after having considered the charges, evidence on record, the explanation in writing as well as personal hearing of the official on 14.9.2023 and findings of the Enquiry Committee (constituted vide office order No. 97, dated 20/3/2023) and in exercise of the powers vested under Rule-14 (5-ii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 has been pleased to award the following minor penalty, as per Rule-4(1)(a)(ii):

"Withholding of three annual increments without accumulative effect due on 1/12/2023, 1/12/2024 and 1/12/2025".


(Asif Ali Shah)
Divisional Forest Officer,
Chitral Forest Division,
Chitral.

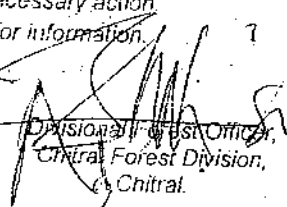
No. 3248-49/G, Dated Chitral the 30/11/2023.

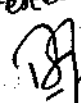
Copy forwarded to the:-

1. Chief Conservator of Forests, Central Southern Forest Region-I (HAD), Peshawar.
2. Chief Conservator of Forests, Malakand Forest Region-III Saidu Sharif Swat.
3. Conservator of Forests, Malakand Forest Circle West at Timergara Lower Dir.

For favour of information, please.

4. SDFO Drosh North Forest Sub Division for information with reference to his letter cited above.
5. Head Clerk/ Accountant Divisional Office Chitral for information & necessary action.
6. Mr. Jahan Zeb Forest Guard C/o SDFO Drosh Forest Sub Division for information.
7. Office order/ inquiry/ Personal Files for record.


Divisional Forest Officer,
Chitral Forest Division,
Chitral.

Attested


سے جسے پوری ہے جبکہ لبرٹ بارہ کے صورتاً ہے جہاں - D.F.O - پورٹ پورٹ
خود سرنگال سٹیٹ کا دفتر کے اپنی اگلی سال کا اختیار کیا تھا۔

جنگل کے الزام سرنگال کے بنیاد اور بدینے میں ہے کہ مذکورہ نعتان جنگل لبرٹ بارہ
سے ہے جسے پورٹ پورٹ ہے یا یہ کہ سائیل نے مذکورہ نعتان سے 5000 روپے لائونگ کو پورٹ
پیس دی ہے جبکہ انڈیا ٹری کیسوں کے پورٹ سے پورٹ کے ایکٹ سے پورٹ سے پورٹ
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یہ لبرٹ پورٹ اور انڈیا سٹیٹ کے ایکٹ سے پورٹ کے ایکٹ سے پورٹ سے پورٹ سے پورٹ سے پورٹ
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20 / 23
119 / 23

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Attested
[Signature]

Attested
181

Handwritten text in Urdu script, appearing to be a legal or official document. The text is written in a cursive style and includes several lines of text, some of which are underlined or indented. There are some numbers and dates visible, such as 1991, 1992, and 1993. The text is written on a page that has a horizontal line across it, possibly indicating a fold or a section break.

Attended
187

Handwritten text in Arabic script, likely a list of names or entries. The text is written in a cursive style and is somewhat difficult to decipher due to the handwriting and some fading.

Handwritten text in Arabic script, possibly a continuation of the list or a separate section. It includes some numbers and names.

Handwritten text in Arabic script, continuing the list or providing additional details. The text is dense and covers the bottom half of the page.

Attested
187

The image shows a document that is extremely noisy and difficult to read. It appears to be a ledger or a receipt with a grid structure. The text is mostly illegible due to the high level of noise and contrast. There are some faint markings and what might be numbers or letters scattered across the grid, but they cannot be accurately transcribed.



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Handwritten text, possibly a signature or date.

Handwritten number 46.

Handwritten number 9.

	<p>OFFICE OF THE CONSERVATOR OF FORESTS MALAKAND WEST FOREST CIRCLE TIMERGARA</p> <p>BALAMBAT COLONY LOWER DIR</p> <p>Ph: 0945-9250120 ☒ Fax: 0945-9250118</p>	
No. 3119	IG&L, Dated Timergara	the 05/01/2024

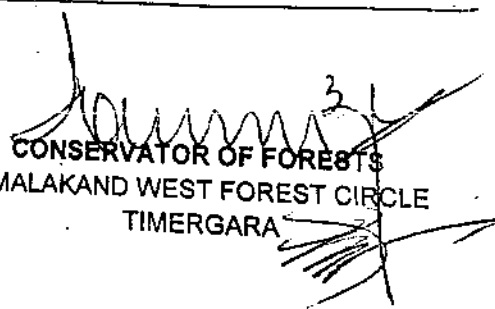
To,

The Divisional Forest Officer,
Chitral Forest Division,
At Chitral.

Subject: **DEPARTMENTAL APPEAL AGAINST DFO CHITRAL OFFICE ORDER NO.46 AND 47 OF EVEN DATED 30-11-2023.**

Memo: Reference your letter No.2836/G dated 13/12/2023.

Appeal against the subject mentioned office orders by M/S Barkat Ullah Forest Guard and Janhan Zeb Forest Guard received through Leopard Service on 01-12-2024 and found time barred, hence rejected. Therefore, the referred named Officials be informed accordingly.


CONSERVATOR OF FORESTS
MALAKAND WEST FOREST CIRCLE
TIMERGARA

No. 3183-24/G, Dated Chitral the 16 / 01 / 2024.

Copy forwarded to M/s Jahah Zeb and Barkat Ullah Forest Guards C/o SDFO Drosh South Forest Sub Division with reference to the letter cited above received from worthy Conservator of Forests, Malakand Forest Circle West for information.


Divisional Forest Officer,
Chitral Forest Division,
Chitral

Attested


Attended
187

24/10/24
Dr R.O. Daniel
[Signature]

Handwritten notes, possibly bleed-through from the reverse side of the page. The text is mirrored and includes various numbers and phrases, such as "20/10/24", "18/10/24", and "19/10/24".

**Office of the
Chief Conservator of Forests
Malakand Forest Region-III**



Shagai Saidu Sharif Swat
☎ 0946-711393
Fax 0946-711394
E-mail: ccfmkd@gmail.com

No. /E, dated Saidu Sharif the 21/12 /2024.

To

The Conservator of Forests,
Malakand West Forest Circle,
At Timergara.

Subject: APPEAL FOR CONSIDERATION AGAINST THE APPELLATE
AUTHORITY LETTER NO. 3119/G&L, DATED 05/01/2024.

Memo:

It is to inform that due to aggrieve up on the decision taken vide you letter No. 3119/G&L, dated 05/01/2024, regarding limitation of time, Mr. Jehan Zeb Forest Guard of Chitral Forest Division approached this office vide his application dated 24/01/2024, which is enclosed herewith alongwith receipt.

In this respect, you are requested to dispose of the appeal in question as per NWFP Civil Servants (appeal) rules, 1986 which is reproduced below.

3. **Right of appeal:-**

- (i) "A civil servant aggrieved by an order passed or penalty imposed by competent authority relating to the terms and condition of service may, within thirty days from the date of communication of the order to him, prefer an appeal to the appellate authority".



**CHIEF CONSERVATOR OF FORESTS,
MALAKAND FOREST REGION (REGION-III)
SAIDU SHARIF SWAT.**

No. 4449 /E.

Copy forwarded to Mr. Jehan Zeb Forest Guard C/O Divisional Forest Officer, Chitral Forest Division at Chitral for information with reference to his application dated 24/01/2024.

**CHIEF CONSERVATOR OF FORESTS,
MALAKAND FOREST REGION (REGION-III)
SAIDU SHARIF SWAT.**

Attested.
[Signature]

	OFFICE OF THE CONSERVATOR OF FORESTS MALAKAND WEST FOREST CIRCLE TIMERGARA		
	BALAMBAT COLONY LOWER DIR		
		Ph: 0945-9250120 ☒ Fax: 0945-9250118	
No. <u>3377</u>	IE,	Dated	Timergara
			the <u>12</u> /01/2024

To,

The Divisional Forest Officer,
Chitral Forest Division,
At Chitral.

**Subject: APPEAL FOR CONSIDERATION AGAINST THE APPEAL
AUTHORITY LETTER NO.3119/G&L DATED 05/01/2024.**

Memo:

Enclosed please find herewith CCF-III letter No.4448/E dated 01/02/2024 which is self-elaborated. Therefore, your are directed to offer you detail comments on the Departmental Appeals of M/S Barkat Ullah Forest Guard and Jahan Zeb Forest Guard at an early date.


CONSERVATOR OF FORESTS
MALAKAND WEST FOREST CIRCLE
TIMERGARA

No. _____ IE,

Copy forwarded to the Chief Conservator of Forests Malakand Forest Region-III Saidu Sharif Swat for favour of information with reference to his letter referred above please.

CONSERVATOR OF FORESTS
MALAKAND WEST FOREST CIRCLE
TIMERGARA

Attested.


Attested

P. 10

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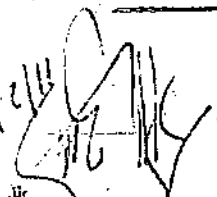
[Faint, illegible handwritten text at the bottom of the page]

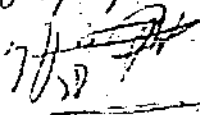
Attest

Handwritten text in a cursive script, possibly a legal document or a list of items. The text is written in a dark ink on a light-colored paper. It appears to be a list of names or descriptions, with some lines starting with "et" or "et al.". The text is somewhat faded and difficult to read in some places.

Handwritten text at the bottom of the page, possibly a signature or a date. It is written in the same cursive script as the main text.

Attested
18/11/2023


18/11/2023
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18/11/2023

18/11/2023

Handwritten text in Hebrew, appearing to be a list or notes, written in a cursive style. The text is oriented vertically on the page.

(3)

OFFICE ORDER NO. 83 DATED CHITRAL, THE 07/02/2023, ISSUED BY MR. ASIF AHMAD DIVISIONAL FOREST OFFICER CHITRAL FOREST DIVISION.

Mr. Jahanzeb Forest Guard (Incharge Mirkhan Block), is hereby attached with Divisional Forest Office Chitral with immediate effect till further orders.

[Signature]
Divisional Forest Officer
Chitral Forest Division
Chitral

NO. 4074-22 /G. Dated Chitral the 07/02/2023.

Copy forwarded to the:-

1. Conservator of Forests, Malakand Forest Circle West at Timargara, Lower Dir for favor of information, please.
2. SDFO Doshi South Forest Sub-Division for information with direction to submit proposal for posting/transfer of field staffs at Doshi South Forest Sub-Division.
3. Assistant/Accountant Divisional Office Chitral for information and necessary action.
4. Mr. Jahanzeb Forest Guard C/O SDFO Doshi South Forest Sub-Division, Doshi.
5. (Office order/personal files for record).

[Signature]
Divisional Forest Officer
Chitral Forest Division
Chitral

[Handwritten initials]

33

OFFICE ORDER NO 99 DATED CHITRAL THE 24/03/2023, ISSUED BY
MR. ASIF ALI SHAH DIVISIONAL FOREST OFFICER CHITRAL FOREST DIVISION CHITRAL.

As proposed by Sub-Divisional Forest Officer Drosh South Forest Sub-Division the following transfer/ posting amongst the field staff of Drosh South Forest Sub-Division is hereby ordered in the best interest of public service with immediate effect.

S.No	Name	Designation	From	To
1	Mr. Iqbal Hussain	Forester	Drosh Forest Check Post	FPP Drosh. Upon the retirement of Mr. Fazlullah Forester
2	Jaharzaib	Forest Guard	Attached with divisional Office, Chitral	Block Officer Mirkhani Block
3.	Shakir Ullah	Forest Guard	Arandu Gol Compartment 17 to 32	Serigal Beat Comptt. No. 01 to 05.
4.	Sohail Aziz	Forest Guard	-----	Additional Charge of Serigal Comptt No.6 to 07.
5.	Hussain Ahmad	Forest Guard	Domel Check post	Arandu Gol Comptt 17 to 32.

s/ /
Divisional Forest Officer
Chitral Forest Division
Chitral.

No 4788-71 IG, Dated Chitral the 24/03/2023.

Copy forwarded to the:

1. Conservator of Forests Malakand Forest Circle West at Timergara for favor of information, please.
2. SDFO Drosh South for information with reference to letter No. 118/D/5 dated 22/03/2023.
3. Head Clerk/Divisional Accountant Chitral Forest Division Chitral for information and necessary action.
4. All the above named officials for information.
5. Office orders file for record.

Divisional Forest Officer
Chitral Forest Division
Chitral.

Attested
187

CIRCULAR NO. 42 DATED ABBOTTABAD THE 20/09/2004 ISSUED BY MUHAMMAD HANIF KHAN CONSERVATOR OF FORESTS ABBOTTABAD CIRCLE ABBOTTABAD.

It has been observed that the Forest Guards of Forests beats do not keep the list of old stumps of their territorial Jurisdiction for handing over to the successors alongwith charge note, which absolves them from the un-reported damage/stumps, detected later on, after their transfer. The staff is charge sheeted after years of their transfer for the alleged un-reported stumps attributed to their tenure through mere approximation of age by the checking and enlisting officials.

To guard against such practice, it has been decided that the territorial forest guards, when ever transferred, should invariably hand over charge to their successors after joint through checking of their beats in presence of the Block Officer/Forester Incharge of the areas, who will countersign the charge report and forward it to Range officer. Failure to follow this procedure shall be the responsibility of the Forester Incharge of the area. Any irregularity not reported by the successor within 15 days of taking over shall be attributed to him.

The above orders/instructions should be communicated to all field staff for strict compliance.

Sd/- (Muhammad Hanif Khan)
Conservator of Forests,
Abbottabad Circle
Abbottabad

Copy forwarded to

- 1- Chief Conservator of Forests, NWFP, Peshawar.
- 2- All the Divisional Forest Officer (T) in Abbottabad Circle for information and necessary action

Conservator of Forests,
Abbottabad Circle
Abbottabad

Attested
18/

Attended

CONSERVATOR OF FORESTS
ABBOTTABAD CIRCLE

(Haji Ali Asghar Khan)
Conservator of Forests
Abbottabad Circle.

Sd/-

It is theretofore ordered that as is required at the time of transfer of charge, the forest should be checked properly both by relieving and relieved official jointly, and it should be certified at the charge report that all forests and plantations etc have been thoroughly checked and no untoward damage exists in the forests. This requirement should be completed in a weeks time and in case some damage exists, it should be listed and signed by both the officials. In case a forest is taken over without this prerequisite then the responsibility will rest with the relieving officer. Whenever checking may not be immediately possible due to snow cover, then it may be mentioned and time fixed for joint checking soon after snow. It is absolutely necessary to hand over a charge in proper condition so that responsibility is fixed on the proper official and protection is ensured during transfers.

It has been observed that forest officials usually manage to get themselves transferred after some unusual damage or other irregularity is committed due to their commission or commission.

SUBJECT: PROTECTION OF FORESTS - TRANSFER OF CHARGE

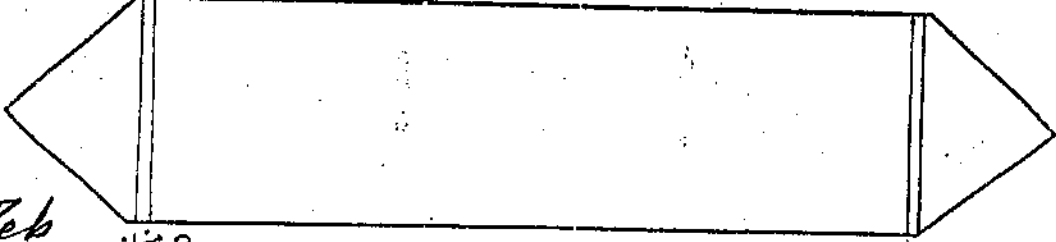
CIRCULAR NO. 4 DATED 2-6 /1996 BY HAJI ALI ASGHAR KHAN
CONSERVATOR OF FORESTS ABBOTTABAD CIRCLE ABBOTTABAD.

No. 1) 2)

Copy forwarded to for favour of information to:
The Chief Conservator of Forests, Territorial/Conservation NWFP, Peshawar.
All Divisional Forest Officers, in Abbottabad Circle for information, guidance and necessary action.

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KPK Service Tribunal, Pesh. بعد الت



Jahan Zeb 2024

28-8-2024

Province of KPK

Jahan Zeb

Service Appeal

موزخه
مقدمه
دعوی
جزم

باعث تحریر آنک

مقدمہ مشدرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
Shahzada Irfan Zia کیلئے Pesh. Adv. آن مقام

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ

پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

جہاں زب

Accepted
2024 Aug 28th
0300-9345297

(Bc. No - 10-7608) کے لئے منظور ہے۔ Peshawar. مقام