

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1200/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/08/2022	<p>The appeal of Mr. Dil Baz Khan presented today by Syed Noman Ali Bukhari Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on . Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;">REGISTRAR</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1200 /2022

Dilabaz Khan

V/S

Police Deptt:

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Dilabaz Khan
APPELLANT
Dilbaz Khan

THROUGH:

Syed Noman Ali Bukhari
SYED NOMAN ALI BUKHARI
ADVOCATE, High Court

Uzma Syed
UZMA SYED
ADVOCATE, High COURT

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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2022

Dilabaz Khan, ASI no: 36/B (Ex-SI)
O/o of the Regional Police officer, Bannu region, Bannu..

.....(Appellant)

VERSUS

1. The Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
2. The Additional Inspector general of Police, Khyber Pakhtunkhwa Peshawar.
3. The Regional Police Officer Bannu Region Bannu.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 22/12/2021 WHEREBY THE PENALTY OF REDUCTION TO TO ASI FROM THE RANK OF OFFICIATING SI UNDER POLICE RULES 1975 AND AGAINST THE REJECTION ORDER DATED 06.07.2022 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 06.07.2022 AND 22/12/2022 MAY BE SET ASIDE AND THE APPELLANT MAY BE RESTORED TO HIS ORIGINAL SCALE OF OFFICIATING SI AND FURTHER CONFIRMATION AS SI WITH ALL BACK AND CONSEQUENTIAL BENEFITS W.E.FROM JUNIOR WAS CONFIRMED. ANY OTHER REMEDY WHICH THIS

(9)

**AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT
MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.**

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was recruited as constable with effect from 23.08.1999, qualified the lower school course in term ending 20.09.2006 and intermediate college courses in term ending 20.03.2014 successfully from PTC, Hangu. Copy of Document is attached as **annexure-A.**
2. That vide letter No. 898-923E-III dated 13.02.2017 the appellant was included in successful candidates against the (in service quota 9%) and his other colleagues against the general quota 25% in direct recruitment as ASI through Public Service Commission, Khyber Pakhtunkhwa. They were appointed as PASIs vide RPO Bannu Region, Bannu order No. 32-36EC dated 23.02.2017 (Annexure A & B are attached) both quotas have been maintained by the Public Service Commission/CPO Peshawar separately. (copy of the appointment order is attached as **annexure-B.**
3. That appellant's other colleague of general quota were selected for Basic PASI course at PTC Hangu, whereas the appellant was exempted from PASI course being already qualified the lower school course and intermediate college course vide PTC Hangu Memo No. 573/EC dated 27.04.2017. copy of letter is attached as **annexure-C.**
4. That a separate practical training program, A, B, C & D under Police Rules 19-25 was chalked out for the appellant respectively. The Commandant PTC Hangu was also granted NOC to continue A, B, C & D Training Program. copy of NOC is attached as **annexure-D.**
5. That during the above mentioned courses an implementation on standing order of Elite Course for PASI was started and successfully completed the 06 months Elite Course.
6. That after completion of all courses satisfactorily and fulfilling on all the codal/legal formalities, the DPO, Bannu vide his Memo No. 7490 dated 22.06.2020 recommended the appellant for confirmation bring his

- name on promotion list E". (Copy of letter is attached at Annexure E).
7. That on recommendation of DPO, Bannu, the RPO Bannu issued appellant's confirmation order and brought his name on promotion list E vide his order endorsement No. 2264/EC dated 20.07.2020 (copy of confirmation order is attached at Annexure F).
 8. That in December 2020, DPC meeting was scheduled by the RPO, Bannu Region, Bannu Senior and junior. Colleagues along with the applicant was called in the said DPC meeting for consideration of appellant name for promotion to the rank of officiating Sub Inspector and accordingly appellant name was approved for the said promotion RPO Bannu Region, Issued promotion order vide his order endorsement No. 4442-45EC dated 17.12.2020. (Copy of DPC meeting and promotion order is attached as annexure-G).
 9. That after the promotion of Sub Inspector, the applicant was transferred to Elite Force, Khyber Pakhtunkhwa for the completion of one year other unit posting tenure which is compulsory for confirmation as Sub inspector and Still serving in elite force.
 10. That RPO, Banu Region issued a Show Cause Notice against appellant alleging appellant promotion 'as wrong' and appellant submitted proper reply to the Show Cause Notice thereafter it was alleged that appellant was summoned to the orderly room held on 21.12.2021 but actually the applicant was not informed in this regard. (Copy of show cause notice and reply is attached as Annexure-H).
 11. That ex-parte action was taken against appellant on the pretext of not attending the orderly room held on 21.12.2021 in spite of the fact that no such information was conveyed to appellant through any way and issued impugned order dated 22.12.2022 of reversion without any plausible cause. Without unearthed the real facts That since appellant was already senior from his colleagues according to Police Rules 12-2 (3) and appellant was awarded regular promotion by the competent authority in DPC meeting after fulfilling all the basic criteria as devised for the promotion, he did not affect seniority of colleague or cross them, as seniority list E' is worth perusal. It is pertinent to mentioned here that junior most colleagues of appellant have been promoted as officiating SI and some of they were confirmed who affected the seniority while the appellant was reverted without any reason which is

(4)

injustice. Copy of the impugned order and seniority list is attached as annexure-I & J.

12. That the appellant preferred departmental appeal against the order dated 22.12.2021 which was rejected vide order dated 06.07.2022 for no good grounds. (Copy of Departmental appeal and rejection order are attached as annexure-K & L).
13. That now the appellant come to this august Tribunal on the following grounds amongst others.

GROUND:

- A) That the impugned order dated 22.12.2021 and 06.07.2022 is against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.
- B) That my illegal reversion affected my one year other unit posting tenure in Elite Force and also from the date of reversion my junior colleagues were granted substantive promotion as Sub Inspector in different occasions. Further it is added that the deptt takes the stance that reversion from officiating rank is not a punishment, which is totally wrong in the light of standing order dated 28/02/2022 and 03/2015, because without promotion to officiating Sub-inspector further promotion to SI cannot be possible, so the appellant was reverted as punishment which effect his promotion and seniority. (Copy of documents attached as annexure-M).
- C) That ex-parte action was taken against appellant on the pretext of not attending the orderly room held on 21.12.2021 in spite of the fact that no such information was conveyed to appellant through any way and issued impugned order dated 22.12.2022 of reversion without any plausible cause. Without unearthed the real facts That since appellant was already senior from his colleagues according to Police Rules 12-2 (3) and appellant was awarded regular promotion by the competent authority in DPC meeting after fulfilling all the basic criteria as devised for the promotion, he did not affect seniority of colleague or cross them, as seniority list 'E' is worth perusal. It is pertinent to mentioned here that junior most colleagues of appellant have been promoted as officiating SI and some of they were confirmed who affected the seniority while the appellant was reverted without any reason which is injustice. Copy of promotion order is attached as annexure-N.
- D) That appellant have appointed as PASI on the recommendation of Public Service Commission under (in service graduate constable/Head constable 19% quota) vide letter & order are quoted above.

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- E) That appellant have exempted from the Basic PASI course as appellant have already qualified lower School Course and Intermediate College Course vide Commandant PTC Hangu letter quoted Above.
- F) That according to Police Rules 19-25 (2) on successfully completing the basic PASDI course i.e Lower School Course & intermediate College Course at Training College. The officer will be posted in district for practica training A,B,C & D, as i was already qualified and exempted from the basic course was chalked out the said practical program for e. I was also granted NOC to continue the said program by the Commandant Police Training College Hangu vide his letter No. 1489-EC, dated 02.12.2017.
- G) That appellant was completed successfully satisfactorily A,B, C & D and also qualified Elite Basic Training of 06 months for PASI, after completion of 3 years probation period comprising of the said course successfully. he was recommended for confirmation to the Regional Police Officer Bannu region, Bannu vide DPO letter No. 1490 dated 20.06.2020 as mentioned in laid down Police Rules 19-25 (5).
- H) That no one of appellant colleagues objected his promotion which showed that he has not over taken his colleagues, and it is also worth mentioning in promotion list E . but all senior and junior colleagues who were promoted with appellant at the same date as officiating sub SI were granted regular promotion to the rank substantive Sub Inspector and other junior most were promoted as Officiating SI, the substantive promotion over took appellant in seniority.
- I) That on 04.06.2021 a letter was issued for DPC meeting for the substantive promotion of officiating Sub inspector vide Region office Memo No. 2132-41EC dated 04.06.2021 and appellant name was mentioned at S. No 54 for the said promotion. Later on issued show cause notice and reverted illegally while other colleagues mentioned in the said letter were promoted to the rank of substantive promotion of SI to the S. No 61 who are junior to appellant.
- J) That appellant name was put in orderly room scheduled on 21.12.2021 but intentionally was not informed which is clear from the call letter issued from Regional Office vide . 5987-90EC dated 21.12.2020 the SP/EF Bannu region was not addressed and also his name was not put in DPO urdu Parwana issued for control room bannu (both are attached). appellant also stated solemnly that appellant was not informed on any way by the anyone.
- K) That appellant was illegally reverted without any plausible grounds and affected his other unit posting tenure in elite Force which is compulsory for confirmation in the Rank of Sub Inspector. Further it is added that the deptt taken the plea that appellant superseded 15 colleagues which is illegal and wrong presumption because the colleges of the appellant was

appointed under initial quota and appellant was appointed in service quota. And appointed order was not issued according to merit.

- L) That one year officiating period is also mandatory for promotion to the Substantive rank SI and such like illegal step can affect the service career and future of officer.
- M) That during appellant reversion period appellant junior colleagues granted promotion to the substantive Sub Inspector who over took appellant seniority, as worth clear from the promotion list E.
- N) That appellant service career badly affected and mentally tortured by taking illegal step against appellant.
- O) That no proper regular inquiry was conducted if any then the appellant was not associated with the inquiry, neither the statement recorded in presence of appellant nor was the chance of cross-examination provided to the appellant and also not provided the inquiry report to the appellant and without final show cause notice the impugned order was passed which is against the law, rules and norms of justice.
- P) That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules.
- Q) That proper procedure was provided in *Rule-5 Read with Rules -6 in of the Police Rules 1975*, which were totally ignored before imposing punishment i.e no proper regular inquiry was conducted if any then the appellant not associated with the inquiry, neither the statement recorded in presence of appellant nor was the chance of cross examination provided to the appellant and also not provided the inquiry report to the appellant, so the impugned order was passed in violation of law and rules and norms of justice.
- R) That the penalty order of the appellant is the violation of basic law and rules as in the penalty order it was not mention the period of reversion to the rank of constable to be effective.
- S) That the appellant was condemned unheard and has not been treated according to law and rules.
- T) That the opportunity of personal hearing and personal defense was not provided to the appellant.

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U) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

دیلاباز خان
APPELLANT
Dilabaz Khan

THROUGH:

سید نومان علی بخاری
SYED NOMAN ALI BUKHARI
ADVOCATE, High COURT
&
وزما سید
UZMA SYED
ADVOCATE, High COURT

(9)

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2022

Dilabaz Khan

V/S

Police Deptt:

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.


DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE.
3. Any other case law as per need.


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

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BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2022

Dilabaz Khan

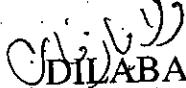
V/S

Police Deptt:

AFFIDAVIT

I, DILABAZ KHAN, (Appellant) hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

DEPONENT


DILABAZ KHAN

(A)


(10)

COURSE "A" COMPLETION CERTIFICATE

Vide W/DPO, Bannu Order Endst; No.15551 dated 26.10.2017, PASI Dilabaz Khan No.32/B was attached with the Legal Branch from 26.10.2017 to 25.01.2018 for practical training courses i.e maintaining of register, checking of challan, making a police brief etc.

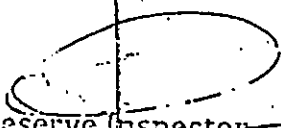
During the mentioned period, his performance was satisfactory, learned about checking of challans, maintenance of register etc.

محمّد فروق خان
کو ریسرڈ
A, B, C, & D


(MUHAMMAD FAROOQ KHAN).
In Charge Legal Cell,
DPO, Office, Bannu

Respected Sir,

PASI Dilabaz Khan 36/B reported in Police Lines Bannu w.r.f 15.08.2017 to 26.09.2017 for the completion of course "B" since he is intelligent Police Officer, he is will conversant from the job of Police practical work i.e. Daily Dairy, other relevant registers maintained in Police Line, Bannu etc. He worked to my entire satisfaction and completed his course "B" (a) period satisfactory. He is expected to become a good Police Officer in future.


Reserve Inspector,
Bannu


Lines Officer,
Bannu.

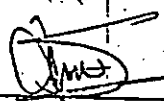
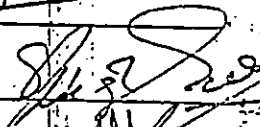

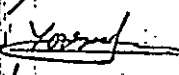
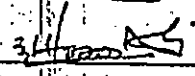

OASI

R/Sir,

(14)

It is submitted that PASI Dilabaz Khan No. 36/B was deputed to undergo practical course "C" with effect from 02.10.2018 to 16.11.2018, during the course the officer showed great interest in learning the procedure of working as Asstt: Reader to DPO, Asstt: Clerk in English Branch, Asstt: I/C VRK, Asstt: RW and Asstt: as Accountant (pay officer) in DPO, Office, Bannu. He was found punctual, hard worker and interested in learning of work.

He has successfully completed the said course and is expected to prove his worth as good police officer.

1. Head Clerk - 
2. Pay officer 
3. Reader to DPO, Bannu 
4. In charge VRK DPO Office, Bannu 
5. RW, DPO, Office, Bannu 

ASSESSMENT REPORT.

PASI Dilabaz Khan No. 36/B remained posted as Station Clerk in PS Kakki with effect from 11.12.2018 to 10.02.2019. During this period his performance was found good and excellent. He was found punctual towards his duty, honest and trust worthy.

I expect him to become a good police officer being a young and energetic.

I wish best for his brilliant future.

[Signature]

MHC PS Kakki, Bannu.

10/02/2019

Sis
forwarded.

[Signature]

SHO/Kakki

11/2/19

SAC

[Signature]
11/2/19

ASSESSMENT REPORT COURSE "D" PART-II

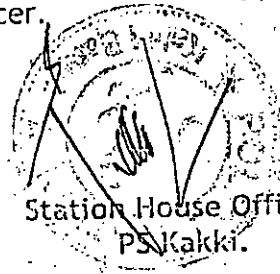
14

PASI Dilabaz Khan No. 36/B remained posted as a Assistant to Station House Officer (ASHO) in PS kakki w.e.f 11.02.2019 to 11.08.2019.

During this Period his performance was found good and satisfactory. He has punctual towards his duty. He is honest and trustworthy.

I expect him to become a competent Police Officer.

I wishes best for his brilliant future.



Pre
For Niazi
Jan
16/8 HC

ASSESSMENT REPORT.

15

PASI Dilabaz Khan No. 36/B remained posted as Assistant to Incharge Investigation in Police Station Kakki, Bannu with effect from 15.08.2019 to 14.06.2020.

During this period his performance was found good and satisfactory. He was found punctual towards his duty, he is honest and trust worthy.

I expect him to become a competent police officer, I wishes best for his brilliant future.

A. S. Khan

Incharge Investigation Staff,
PS Kakki.

Forwarded, p.e.

Superintendent of Police
Investigation Bannu

19.06.2020.



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

(B)

(16)

No. E-III, Dated Peshawar, the 13/02/2017.

To The Capital City Police Officer,
Peshawar.
All Regional Police Officers,
in Khyber Pakhtunkhwa.

Subject: RECRUITMENT OF ASIS THROUGH PUBLIC SERVICE COMMISSION
(ADVERTISEMENT NO. 04/2014).

Memorandum: Consequent upon recommendation of Khyber Pakhtunkhwa Public Service Commission, Peshawar vide letter No. KPK. PSC-EXAM-2016/02330, dated 01.02.2017, the following candidates are hereby approved as ASIs (BPS-09) against the 25% allotted shares for direct recruitment, 19% allotted for Graduate Constables/Head Constables and 10% allotted shares for female. Vide, Govt. of Khyber Pakhtunkhwa Home & TAs Department letter No. SO(Police)/HD/3-22/Vol-VI, dated 06.02.2017:-

a) General Quota:

S.No	Name/Father's Name	District Domicile
1.	Syed Ali Abbas s/o Syed Shahid Hussain Shah	Peshawar
2.	Afaq Ahmad s/o Yousaf	Peshawar
3.	Arbab Tej Haider s/o Arbab Hayat Ullah	Peshawar
4.	Ajmal Hayat s/o Sanobar Khan	Peshawar
5.	Asif Khar s/o Faseeh-ud-Din	Peshawar
6.	Muhammad Akif Anjum s/o Muhammad Ibrar Anjum	Peshawar
7.	Faheem Shah s/o Ajmal Shah	Peshawar
8.	Abdul Aziz s/o Abdul Ghani	Peshawar
9.	Mudassar Iqbal s/o Bakhri Gul	Peshawar
10.	Intekhab Alam s/o Muhammad Alam	Peshawar
11.	Aqib Khan s/o Khan Muhammad	Peshawar
12.	Asad Ullah s/o Barkat Ali Sher	Peshawar
13.	Muhammad Usman Khan s/o Muhammad Zahir Khan	Peshawar
14.	Aadarsh Majmar s/o Khadim Shah	Peshawar
15.	Shehzad Ali Khan s/o Akbar Ali Khan	Peshawar
16.	Muhammad Subhan Ullah s/o Khan Badshah	Peshawar
17.	Mudassar Hayat s/o Siraj ul Haq	Peshawar
18.	Aqil Khan s/o Nawab Khan	Peshawar
19.	Fazil Amin s/o Momin Khan	Peshawar
20.	Muhammad Saddam Riaz s/o Muhammad Riaz	Peshawar
21.	Rizwan Ullah s/o Mukhtiar Muhammad	Peshawar
22.	Tariq Ullah s/o Shahbaz Khan	Peshawar
23.	Muhammad Bilal s/o Fazle Subhan	Peshawar
24.	Salman Latteef s/o Lateef Khan	Peshawar
25.	Asghar Ali Khan s/o Liaqat Ali	Peshawar
26.	Muhammad Ishtiaq s/o Muhammad Rafiq	Peshawar
27.	Ozair Khan s/o Zain-ul-Abideen	Peshawar
28.	Syed Ali Imran s/o Syed Imran Shah	Peshawar
29.	Kifayat Ullah s/o Nasr Ullah	Peshawar
30.	Yasir Iqbal s/o Muhammad Iqbal	Peshawar
31.	Muhammad Yasen Ali s/o Sher Muhammad	Charsadda
32.	Abdullah s/o Asmat Ullah	Charsadda
33.	Muhammad Hamid Ali s/o Ghafar Ali	Charsadda
34.	Adnan Rehman s/o Gul Rehman	Charsadda
35.	Adnan Waheed s/o Abdul Waheed	Charsadda
36.	Syed Ilyas s/o Syed Surat Shah	Charsadda
37.	Shehriyar s/o Marjan Ali	Charsadda
38.	Shah Saad Khan s/o Hamish Gul	Charsadda
39.	Muhammad Nasir s/o Habib-ur-Rehman	Nowshera
40.	Safi Ullah s/o Hussain Khan	Nowshera
41.	Hafiz-ud-Din Khattak s/o Salan-ud-Din Khattak	Nowshera
42.	Muhammad Tayyab s/o Zar Khan	Nowshera
43.	Naseer Khan s/o Abdul Malik	Nowshera

معمولی برائے سرپرست

S.No	Name/Father's Name	District Domicile
		Nowshera
44.	Qasim Zaman s/o Fazal Zaman	Nowshera
45.	Afaq Ahmad s/o Muhammad Azeem	Mardan
46.	Farooq Ali s/o Chaman Khan	Mardan
47.	Shahid Alam s/o Noor Rahman	Mardan
48.	Ansar Ahmad s/o Izzar Ahmad	Mardan
49.	Yasir Arafat s/o Said Karim	Mardan
50.	Amir Riaz s/o Riaz Ali Shah	Mardan
51.	Muhammad Asim s/o Sami-ul-Haq	Mardan
52.	Faizan Ahinad Tariq s/o Abdul Samad	Mardan
53.	Ijaz Ali Khan s/o Gohar Ali Khan	Swabi
54.	Arsalan Khan s/o Muhammad Idrees	Swabi
55.	Fahad Zaman Khan s/o Fida Muhammad	Swabi
56.	Salan Tahir s/o Tahir Tasleem	Abbottabad
57.	Tuseef-ur-Rehman s/o Saif-ur-Rehman	Abbottabad
58.	Ahsan Khan s/o Muhammad Arshad	Abbottabad
59.	Ahsan Irshad s/o Irshad Khan	Abbottabad
60.	Malik Khan s/o Arif Khan	Abbottabad
61.	Ahsan Shakoor s/o Abdul Shakoor	Abbottabad
62.	Faizan Ashraf s/o Muhammad Ashraf	Abbottabad
63.	Malik Muhammad Shoaib s/o Sultan Muhammad	Abbottabad
64.	Dilawar Ali s/o Liaqat Ali	Manshra
65.	Ashar Mushtaq s/o Muhammad Mushtaq	Manshra
66.	Adeel Rafique s/o Muhammad Rafique	Manshra
67.	Araib Amir s/o Amir Habib	Manshra
68.	Syed Maqsood Ali Shah s/o Zulfiqar Ali Shah	Manshra
69.	Saad Amir Hussain s/o Amir Hussain Khan	Manshra
70.	Hamza Ali Khan s/o Muhammad Pervez Khan Awan	Manshra
71.	Shujat Hussain Qureshi s/o Nazar Hussain Qureshi	Manshra
72.	Syed Shams-ul-Islam Shah s/o Syed Fakhr-ul-Islam Shah	Haripur
73.	Saddam Hussain s/o Syed Chan Shah	Haripur
74.	Syed Zohaib Ejaz s/o Ejaz Hussain Shah	Haripur
75.	Syed Yousaf-ul-Hassan Muhaviya s/o Syed Ikhtlaq Hussain	Kohistan
76.	Fazal Hadi s/o Manzar Khan	Kohistan
77.	Amir Manzoor s/o Muhammad Manzoor	Kohistan
78.	Bilal Iqbal s/o Muhammad Zaman	Kohistan
79.	Hazrat Abuzar s/o Rahim Ullah	Kohistan
80.	Israr Ahmad s/o Abdul Rehman	Swat
81.	Azhar Ullah Khan s/o Alam Khan	Swat
82.	Waqar Ali s/o Rashid Ali	Swat
83.	Muhammad Ijaz s/o Muzaffar Hussain	Swat
84.	Muhammad Ilyas s/o Muzaffar Hussain	Swat
85.	Akbar Syed s/o Mian Said Anbar	Swat
86.	Abdul Latif Khan s/o Adil Khan	Swat
87.	Syed Kiramat Ullah s/o Mian Syed Qasim Jan	Shangla
88.	Ashraf Ali s/o Muhammad Khan	Shangla
89.	Inayat Ullah Khan s/o Aurangzeb	Upper Dir
90.	Asad Ullah s/o Ibadat Jan	Upper Dir
91.	Adil Anayat s/o Anayat Ullah	Upper Dir
92.	Rizwan Ullah Khan s/o Nasrullah Khan	Upper Dir
93.	Zohaib Arshad s/o Falak Naz	Upper Dir
94.	Hafiz-ud-Din Sangeen Khan	Upper Dir
95.	Nawab Zada s/o Said Khan	Upper Dir
96.	Bilal Inayat s/o Inayat Ullah	Upper Dir
97.	Ejaz-ul-Haq s/o Irfan-ud-Din	Upper Dir
98.	Muhammad Zada s/o Hazrat Khan	Lower Dir
99.	Tawseef Khan s/o Wazir Badshah	Lower Dir
100.	Sahibzada Imran s/o Muhammad Zada	Lower Dir
101.	Faheem Ahmad s/o Hasil Khan	Lower Dir
102.	Jawad Khan s/o Bahrawar Said	Lower Dir
103.	Saif Ullah s/o Noor Faraz Khan	Lower Dir
104.	Subhan Ullah s/o Muhammad Said	Lower Dir
105.	Nasir Khan s/o Sultan Muhammad	Lower Dir
106.	Asif Mudaser s/o Muhammad Zubair	Lower Dir
107.	Nasir Khan s/o Muhammad Zahir Khan	Lower Dir
108.	Abasin Baryal s/o Said Bahadur	Lower Dir
109.	Salman Ahmad s/o Mushtaq Ahmad	Lower Dir
110.	Zohaib Ali Khan s/o Zar Zamin Khan	Lower Dir
111.	Nasib Dar s/o Muhammad Ayub	Lower Dir
112.	Sana-ur-Rehman s/o Hanif-ur-Rehman	Lower Dir
113.	Inam Ullah s/o Aabid Ullah	Lower Dir

17

S.No	Name/Father's Name	District Domicile
114.	Rizwan Ullah s/o Muhammad Israr	Lower Dir
115.	Syed Mujtaba s/o Shah Jehan	Buner
116.	Irshad Ullah s/o Amin Ullah	Buner
117.	Khaliq-uz-Zaman s/o Qamar-ur-Zaman	Buner
118.	Syed Naseer-ud-Deen s/o Syed Haroon-ur-Rasheed	Buner
119.	Muhammad Farooq s/o Habib Ullah	Buner
120.	Bakht Rashad s/o Room Shad	Buner
121.	Faisal s/o Ali Bahadar Khan	Buner
122.	Naveed Ahmad s/o Khaista Muhammad	Buner
123.	Shahzad Ali s/o Habib Khan	Buner
124.	Gauhar Rehman s/o Bahramant Khan	Buner
125.	Muhammad Ahmad Ali s/o Deat Muhammad	Buner
126.	Azfar Alam s/o Abdul Nasir Khan	Chitral
127.	Didar Ali Shah s/o Muhammad Yousaf	Chitral
128.	Muhammad Imtiaz s/o Muhammad Juma Khan	Chitral
129.	Noor Sabih Ullah s/o Hamid-ur-Rehman	Chitral
130.	Meral-ud-Din s/o Fazal Karim Khan	Chitral
131.	Syed Ali Raza Shah s/o Syed Akram Shah	Chitral
132.	Nazar Ahmad s/o Nazar Ahmad	Chitral
133.	Momin Ahmad s/o Noor Wali Khan	Chitral
134.	Abdullah s/o Haji Muhammad	Chitral
135.	Muhsin-ul-Haq s/o Abdul Haq	Chitral
136.	Shahzad Ali Syed s/o Syed Karim Ali Shah	Chitral
137.	Shams-ur-Rahman s/o Haji Murad	Chitral
138.	Muhammad Saif-ud-Din s/o Muhammad Ikram-ud-Din	Chitral
139.	Khizer Fareed s/o Muhammad Fareed	Kohat
140.	Nasir Farid s/o Farid Ullah Shah	Karak
141.	Waqar Ahmad s/o Izzat Khan	Karak
142.	Muhammad Idrees s/o Sabar Jamil	Karak
143.	Faizan Satar s/o Abdul Satar	Karak
144.	Zeeshan Zahoor s/o Zahoor Ullah Khan	Karak
145.	Ali Kamran s/o Abdul Rauf	Bannu
146.	Nauman Khan s/o Shah Niaz Khan	Bannu
147.	Naseeb Ullah Shah s/o Muhammad Ali Shah	Bannu
148.	Muhammad Alan Khan s/o Ghulam Rehman	Bannu
149.	Muhammad Momin Khan s/o Muhammad Riaz Khan	Bannu
150.	Wajid-ur-Rehman s/o Zahid-ur-Rehman	Bannu
151.	Asim s/o Habib Ullah Khan	Bannu
152.	Muhammad Basit Shah s/o Azad Ali Shah	Bannu
153.	Muhammad Bakhtiar s/o Abdul Khanan	Lakki Marwat
154.	Anwar Ullah Khan s/o Inayat Ullah Khan	Lakki Marwat
155.	Abdul Waheed s/o Abdul Rasheed	Lakki Marwat
156.	Wasim Sajjad Khan s/o Khan Zaman	Lakki Marwat
157.	Inam Ullah Khan s/o Aman Ullah Khan	Lakki Marwat
158.	Anees-ur-Rehman s/o Muhammad Younas Khan	Lakki Marwat
159.	Muhammad Taimur s/o Adam Khan	Lakki Marwat
160.	Muhammad Imran s/o Ghulam Yaseen	DIKhan
161.	Muhammad Khubaib Walee s/o Fazal-ur-Rehman Baloch	DIKhan
162.	Muhammad Shah Zeeshan Iqbal s/o Ghulam Rabbani Khan	DIKhan
163.	Saddam Hussain s/o Shah Jahan	DIKhan
164.	Sana Ullah Khan s/o Muhammad Ayub Khan	DIKhan
165.	Fahcem Abbas s/o Ghulam Qasim	DIKhan
166.	Najeeb Ullah Khan s/o Niamat Ullah Khan	DIKhan
167.	Abid Ullah s/o Hamid Ullah	DIKhan
168.	Muhammad Aftab Alam s/o Faiaq Sher Khan	DIKhan
169.	Sami Ullah Khan s/o Haji Abdul Latif Khan	Tank

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b) Female Quota:

S.No	Name/Father's Name	District Domicile
1.	Aalia Nawab d/o Nawab Ali Khan	Peshawar
2.	Dilshad Pari s/o Syed Aziz Wali Shah	Chitral

c) In-Service Graduate Constable/Head Constable Quota:

S.No	Name/Father's Name	District Domicile
1.	Hayat Muhammad s/o Hilal Muhammad	Charsadda
2.	Qazi Muhammad Saleem s/o Qazi Muhammad Yousaf	Mardan

S.No	Name/Father's Name	District Domicile
3.	Aamir Ali s/o Sher Ali Khan	Swabi
4.	Qamar Nawaz s/o Shah Nawaz	Haripur
5.	Tahir Hussain Shah s/o Noor Nabi Shah	Battagram
6.	Syed Abdul Sattar Shah s/o Syed Abdullah Shah	Battagram
7.	Muhammad Adil s/o Mirza Ali Khan	Karak
8.	Dil Baz Khan s/o Jahan Sardar	Bannu

Necessary Notification regarding their appointment may please be issued subject to Medical Fitness, verification of antecedent and verification of documents/testimonials from the concerned Board/University under the relevant rules and prescribed manner under intimation to all concerned. Their applications together with other relevant documents are also sent herewith for placing in their Character Roll/Service Roll.

(MUHAMMAD ALAM SHINWARI)^{psr}
DIG/HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. 848-923 /E-III,

Copy of above is forwarded for information & Necessary action to the:-

1. Director Examination KPK Public Service Commission w/r to his above quoted letter.
2. All District Police Officers, in Khyber Pakhtunkhwa.
3. Section Officer (Police) Govt. KPK, Home & TAs Department Peshawar w/r to his above quoted letter.

(MUHAMMAD ALAM SHINWARI)^{psr}
DIG/HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

09/11/17

ORDER

On approval by the Public Service Commission, Khyber Pakhtunkhwa vide letter No.KPK PSC-Exam-2016/002330, dated 01.02.2017 received from CPO Peshawar vide Memo: No.891-97/E-III, dated 13.02.2017, the following 16 candidates (15 in 25% quota and 01 in 19% quota) are hereby appointed as Probationer Assistant Sub Inspectors from the dates, allotted range numbers and posted to the districts as noted against their names:-

S.#	Name & Father name	Date of appointment	Allotted Range Number	Place of posting
1.	Ali Kamran s/o Abdul Rauf ✓	13.02.2017	2/B	District Bannu
2.	Nauman Khan s/o Shah Niaz Khan	13.02.2017	5/B	District Bannu
3.	Nasibullah Shah s/o Muhammad Ali Shah ✓	13.02.2017	6/B	District Bannu
4.	Muhammad Alam Khan s/o Gulam Rahman	13.02.2017	8/B	District Bannu
5.	Muhammad Momin Khan s/o Muhammad Riaz Khan	13.02.2017	14/B	District Bannu
6.	Wajid-ur-Rehman s/o Zahid-ur-Rehman	13.02.2017	15/B	District Bannu
7.	Asim s/o Habibullah Khan	13.02.2017	17/B	District Bannu
8.	Muhammad Basit Shah s/o Azad Ali Shah	13.02.2017	19/B	District Bannu
9.	Muhammad Bakhtiar s/o Abdul Khanan	13.02.2017	20/B	District Lakki
10.	Anwarullah Khan s/o Inayatullah Khan	13.02.2017	22/B	District Lakki
11.	Abdul Waheed s/o Abdul Rasheed	13.02.2017	25/B	District Lakki
12.	Wasim Sajjad s/o Khan Zaman	13.02.2017	27/B	District Lakki
13.	Inamullah Khan s/o Amanullah Khan	13.02.2017	29/B	District Lakki
14.	Anees-ur-Rehman s/c Muhammad Younas Khan	13.02.2017	30/B	District Lakki
15.	Muhammad Taimur s/o Adam Khan	13.02.2017	31/B	District Lakki
16.	Dil Baz Khan s/o Jahan Sardar	13.02.2017	36/B	District Bannu

Necessary gazette notification subject to medical fitness, verification of antecedents and verification of documents/testimonials from the concerned board/university under the relevant rules and prescribed manner may be issued/made under intimation to all concerned.

They may be informed accordingly.

(MUHAMMAD ALI KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu

No. 732-36 /EC, dated: 23 /02/2017

Copy to:-

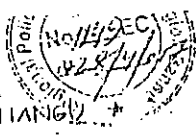
1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar for information w/r to CPO Peshawar Memo: No.891-97/E-III, dated 13.02.2017.
2. The District Police Officers, Bannu and Lakki for information and n/a.
3. The SsP/Investigation, Bannu and Lakki for information.

(MUHAMMAD ALI KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu

23/2/17

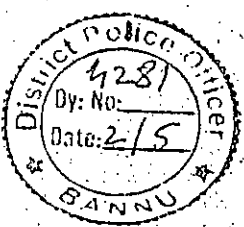


OFFICE OF THE COMMANDANT POLICE TRAINING COLLEGE, HANGU



2
21

From: The Commandant
Police Training College, Hangu.
To: The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
No. /EC dated Hangu, the 27/04/2017.
Subject: APPLICATION
Memo:-



Kindly refer to your office memo: No.1872/E-III dated 13.04.2017

It is submitted that applicant IHC Dilbaz Khan No.891 of Bannu District (now enrolled as PASI through PCS in the quota reserved for in-service graduate HC) has already qualified Lower Course in term ending 20.09.2006 while qualified Intermediate course in term ending 20.03.2014. Therefore, as per past precedent, the applicant is entitled for immunity/exemption from the basic PASI course conditionally by giving a written affidavit that he will not claim seniority and his seniority will be considered with his own colleagues PASIs of his region.

Prinicipal
COMMANDANT,
POLICE TRAINING COLLEGE,
HANGU

No 574/EC

Copy to Regional, Police Officer, Bannu Region, Bannu w/r to his office endst: No.1202/EC dated 07.04.2017 for similar action, please.

No. 1433/EC, dt 28/4/17

APPO Bannu

for m-a. please

Prinicipal
COMMANDANT,
POLICE TRAINING COLLEGE,
HANGU

0981/S2C

for further reference

vs
APPO Bannu
28/4/17

[Signature]
28/4/17

(D)

(2)

Ph # 0925-621886
Fax # 0925-620886



Office of The Commandant Police Training College Hangu

From:

The Commandant,
Police Training College, Hangu.

To

The District Police Officer, Bannu.

No. 1488

/EC, Dated Hangu the;

07/11/2017

10890
13/11

Subject: -

APPLICATION OF PASI DILABAZ KHAN NO. 36/B.

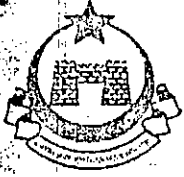
Memo:-

Please refer to your Office Memo No. 15307, dated 19.10.2017.

It is stated that this office has got no objection on the selection of PASI Dilabaz No. 36/B to A, B, C and D courses.

Fazimullah
Commandant
Police Training College, Hangu.

~~SRC/1537~~
13/11



OFFICE OF THE
DISTRICT POLICE OFFICER
BANNU

No. 7690
Dated: 22/10/2020

Phone: 0928-9270038
Fax No: 0928-9270045

The Regional Police Officer,
Bannu Region, Bannu.

CHARACTER ROLLS+COMPLETION OF PRACTICAL
COURSES A, B, C & D.

Enclosed kindly find herewith Character Rolls (In duplicate) along with Assessment Reports of Course D (Part I, II & III) in respect of PASI Dilabaz Khan No: 36/B for kind perusal and countersignature.

The said PASI was recommended by the Public Service Commission, Khyber Pakhtun Khwa, Peshawar and appointed as PASI against 19 % Quota reserved for IN-SERVICE OFFICIALS in Police Department.

The said PASI completed probation tenure and have got satisfactory reports of courses A, B, C & D.

From perusal of his service record and satisfactory reports, PASI Dilabaz Khan No. 36 is recommended for confirmation in his appointment, Service Record is also submitted herewith for favour of kind perusal and further order, please.

2020
District Police Officer,
Bannu

F

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BANNU REGION

POLICE DEPARTMENT

ORDER

On completion of probation period satisfactorily, Probationer Assistant Sub-Inspector Dilabaz Khan No.36/B of Operation Staff Bannu is hereby confirmed as Assistant Sub-Inspector from the date of his appointment i.e 13.02.2017 and his name also brought on promotion list "E" under Police Rules 12.2(3) and 19.25(5).

Necessary Gazette notification may be issued under intimation to all concerned.

(Signature)
(ABDUL GHAFOR AFRIDI) PSP
Regional Police Officer,
Bannu Region, Bannu.

16/7/20

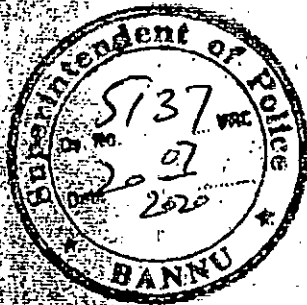
No. 2264 IEC, dated Bannu the 20/07/2020

Copy to District Police Officer, Bannu for information and necessary action w/r to his office Memo: No.7490 dated 22.06.2020.

S. Roll = 01
S. Book = 01
Character Roll = 02

(Signature)
(ABDUL GHAFOR AFRIDI) PSP
Regional Police Officer,
Bannu Region, Bannu.

16/7/20



SRC
For information
(Signature)
District Police Officer
BANNU 20/7

POLICE DEPARTMENT

25

DISTRICT BANNU

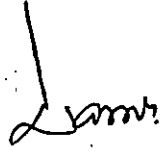
FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDERED BY THE DISTRICT POLICE OFFICER, BANNU.

NOTIFICATION.

Dated Bannu the _____

/2020.

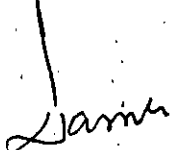
No. _____ / PROMOTION/CONFIRMATION:- On completion of probation period satisfactorily, PASI Dilabaz Khan No. 36/B is hereby confirmed as ASI from the date of his appointments i.e. 13.02.2017 and his name also brought on promotion list "E" under Police Rules 12.2 (3) and 19.25 (5) vide Regional Police Officer, Bannu Region, Bannu Order Ends: No.2264/EC, dated 20.07.2020.


District Police Officer,
Bannu.

No. 9181-85 / dated Bannu the 22 / 7 /2020.

Copy of above is submitted to:-

1. The Additional Inspector General of Police /Investigation KPK, Peshawar along with two spare copies of the gazette Notification for favor of publication in the KPK Police Gazette Notification.
2. The Regional Police Officer Bannu, Region Bannu with reference to his office Order Ends: No.2264/EC, dated 20.07.2020.
3. All concerned.


District Police Officer,
Bannu.

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The Regional Police Officer,
Bannu Region, Bannu

The Deputy Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa, Peshawar

The District Police Officers, Bannu & Lakki Marwat
The SsP/Investigation, Bannu & Lakki Marwat

1066 65/EC, dated Bannu, the 19/11/2020

DPC FOR PROMOTION OF ASIS TO THE OFFICIATING RANK OF SIS

It is intimated that a DPC meeting will be held on 25.11.2020 at 10:00 hours, in the presence of the undersigned to consider the promotion cases of the following confirmed ASIs to the rank of officiating SIs. The DPOs Bannu & Lakki Marwat are informed to attend the said DPC meeting on due date and time. Besides, departmental proceedings, if any, exist against them, may also be sent to this office before the target date i.e 25.11.2020:-

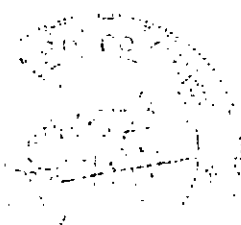
- | | |
|---------------------------------|------------------------------------|
| 1. ASI Imran Khan No. 116/B | Operation Staff Bannu |
| 2. ASI Fidaulah No. 117/B | -do- |
| 3. ASI Mumtaz Khan No. 115/B | -do- |
| 4. ASI Arifullah Khan No. 114/B | -do- |
| 5. ASI Dilabaz Khan No.36/B | -do- |
| 6. ASI Noor Kamal No.155/B | Operation Staff Lakki Marwat |
| 7. ASI Irshad Ali No.16/B | Special Branch, Khyber Pakhtunkhwa |
| 8. ASI Said Azam No.59/B | Investigation Staff Bannu |
| 9. ASI Hameed Ullah No.46/B | Special Branch, Khyber Pakhtunkhwa |
| 10. ASI Abdur Rasheed No.70/B | Operation Staff Bannu |
| 11. ASI Munawar Khan No.9/B | Investigation Staff Lakki Marwat |

All the above mentioned police officers of your districts/units either on loan or on deputation to other districts/units may also be informed to attend the said DPC meeting on due date and time.

تعمیر کے لیے
OSI
تعمیر کے لیے
Approval

Awalki
(AWAL KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu

9/11/20



Offi

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BANNU REGION

POLICE DEPARTMENT

ORDER

On approval of the Departmental Promotion Committee in its meeting held on 25.11.2020 in the office of the undersigned, the following confirmed Assistant Sub Inspectors of Bannu Region on list "E" are hereby promoted to the rank of Officiating Sub Inspectors under Police Rules, 13.1, 13.4 & 13.12.

S.#	Name, Rank & No.	District/Unit
1.	ASI Imran Khan No. 116/B	Operation Staff Bannu
2.	ASI Fidaullah No. 117/B	-do-
3.	ASI Mumtaz Khan No. 115/B	-do-
4.	ASI Arifullah Khan No. 114/B	-do-
5.	ASI Dilabaz Khan No.36/B	-do-
6.	ASI Noor Kamal No. 15/B	Operation Staff Lakki Marwat
7.	ASI Irshad Ali No. 16/B	Special Branch, Khyber Pakhtunkhwa
8.	ASI Said Azam No. 59/B	Investigation Staff Bannu
9.	ASI Hameed Ullah No.46/B	Special Branch, Khyber Pakhtunkhwa

Their promotion will take effect from the date they take the charge of their higher responsibilities. Necessary gazette notification may be issued under intimation to all concerned.

(AWAL KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu

No. 4442-45/EC, dated Bannu the 17/12/2020

Copies to:-

1. The Deputy Inspector General of Police, Special Branch, Khyber Pakhtunkhwa Peshawar for information.
2. The District Police Officers, Bannu & Lakki Marwat for information and issuance of gazette notification under intimation to all concerned.
3. The SP/Investigation, Bannu for information.

RC
For necessary Action

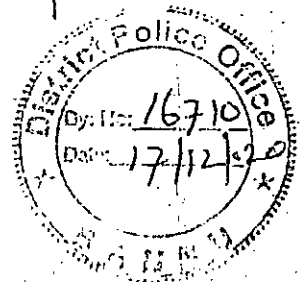
Dunn

Officer
17/12/2020

Awal Khan

(AWAL KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu

17/12/20



SHOW CAUSE NOTICE

(Under rules 5(3) KPK, police rules, 1975 (Amended with 2014))

- That you, OSI Dilabaz Khan have apparently being promoted illegally by overtaking some of your batch mates obtaining seniority in contravention to existing rules in the subject promotion.
- That after perusal of the relevant record, it was found that during "D" Course you Offg: SI Dilabaz Khan No.36/B was posted as Focal Person/Incharge Complaint Cell in contravention of the laid down rules. Record further reveals that you have superseded your 15 colleagues by manipulating your confirmation as ASI; bringing your name on promotion list "E" and promotion as Offg: SI after collusion with the dealing hands of DPO and RPO Offices Bannu while your other colleagues total in number 15 are still under probation.
- You are therefore required to show cause as to why the order with regards to your Offg: promotion as SI and bringing your name on promotion list "E" should not be withdrawn/ set aside.

You should submit your reply to this show cause notice within seven (07) days from the date of issue of this notice, failing which an ex parte action shall be taken against you.

You are further directed to inform the undersigned that as to whether you wish to be heard in person or not.

(SAJID ALI KHAN)PSP
Regional Police Officer,
Bannu Region, Bannu

No. 3096-98 /EC, dated Bannu the 27/08/2021

Copies to:-

1. The District Police Officer, Bannu for information.
2. The RPEO, Bannu to thrash out the role of the accused officer as well as the dealing hands by giving him undue promotion/seniority as well as fix responsibility with regard to his unauthorized posting as Incharge Complaint Cell while he was under "D" Course.
3. The accused police officer.

(SAJID ALI KHAN)PSP
Regional Police Officer,
Bannu Region, Bannu

بحوالہ مشمولہ شوکاژ نوٹس نمبر EC/98-3096 مورخہ 27.08.2021 بجاریہ جناب ریجنل پولیس آفیسر

صاحب بنوں ریجن، بنوں بالالزامات ذیل یہ کہ:

۱۔ آپ OSI مجوزہ قوانین کے برعکس اپنے ہم ریٹکس سے سیناریائی کے خلاف غیر قانونی طور پر ترقیاب ہو چکے ہوں۔

۲۔ یہ کہ بعد از ملاحظہ پایا گیا۔ کہ آپ OSI دوران "D" کورس بطور انچارج کمپلیٹ سیل / فوکل پرس تعینات ہوئے تھے۔ جو کہ خلاف قانون ہے۔ ریکارڈ سے مزید پایا گیا ہے۔ کہ آپ OSI نے بسلسلہ کنفریشن بطور ASI، پروموشن

لسٹ E پر نام لانے اور ترقیابی بعدہ OSI دفتر جناب RPO صاحب اور دفتر جناب DPO صاحب کے Dealing Hands کیساتھ باہمی میل ملاپ کر کے اپنے 15 ہم ریٹکس کو superseded کیا۔ جبکہ آپ 15 ہم ریٹکس تا حال under probation period ہے۔

عالیجاہ:

بالالزامات کے روشنی میں معروض حدمت ہوں کہ:

۱۔ سال مورخہ 23.08.1999 کو محکمہ پولیس میں بطور ریکروٹ کنسٹیبل بھرتی ہو کر ریکروٹ کورس پاس کر کے 2006 میں لوئر سکول کورس اور 2014 میں انٹرمیڈیٹ کالج کورس کامیابی کیساتھ مکمل کئے۔

۲۔ 2014 میں پبلک سروس کمیشن خیبر پختونخواہ، پشاور نے KP پولیس میں 25% جنرل کوٹہ اور 19% ان سروس (گریجویٹ کنسٹیبل / ایڈ کنسٹیبل) کوٹہ کے تحت بھرتی کا اشتہار کیا۔ سائل نے مطلوبہ معیار پر پورا اترنے کی بناء

پر ان سروس کوٹہ کے تحت کاغذات جمع کئے۔ جملہ امتحانات میں جنرل کوٹہ امیدواران کے ساتھ بنوں ریجن میں صرف من سائل ان سروس کوٹہ کے تحت کامیاب ہو کر Commission Office نے PASI بھرتی کے لئے recommend کیا تھا۔

۳۔ خیبر پختونخواہ پبلک سروس کمیشن آفس نے جنرل کوٹہ کے تحت کامیاب امیدواران کی District wise فہرست ہائے الگ جبکہ ان سروس کوٹہ کے تحت کامیاب امیدواران کی فہرست الگ مرتب کر کے بوساطت سنٹرل پولیس آفس، پشاور سے ریجن ہذا ارسال ہوئے تھے۔ بعد از ضروری کارروائی بھرتی آرڈر میں 25% جنرل کوٹہ کے تحت کامیاب امیدواران میں ضلع بنوں کے امیدواران کے نام پہلے ضلع کی مروت کے امیدواران کے نام بعد جبکہ 19% ان سروس کوٹہ کے تحت من سائل کا نام کو آخر میں تحریر کر کے جاری کیا گیا۔

اس ضمن میں قابل ذکر امر کی وضاحت عرض کرنا چاہتا ہوں کہ بھرتی آرڈر میرٹ لسٹ کی بنیاد پر مرتب نہیں کیا گیا ہے۔ بلکہ خیبر پختونخواہ پبلک سروس کمیشن سے موصول شدہ District Wise کامیاب امیدواران کی فہرست ہائے کی مطابق جاری ہو چکا ہے۔ جسمیں ضلع بنوں کو الگ، ضلع کی مروت اور ان سروس کوٹہ کو الگ الگ رکھا گیا ہے۔

۴۔ بھرتی آرڈر جاری ہونے کے بعد جنرل کوٹہ کے تحت بھرتی شدہ PASIs کو Basic PASI Course کے لئے پولیس ٹریننگ کالج ہنگو کو منتخب ہوئے۔ جبکہ من سائل کو لوئر سکول کورس اور انٹرمیڈیٹ کالج کورس کو پہلے سے کوالیفائیڈ ہونے

کورس کو مکمل ہونے پر جناب RPO صاحب سے Approved ہونے پر دوسرا کورس شروع کیا جاتا۔
 دوران پرومیشن پریڈیشننگ آرڈر نمبر 10/2014 پر عمل درآمد شروع ہو کر من سائل کو PASI مینڈیٹری ایلٹ کورس۔
 لئے منتخب کیا گیا۔ اور مذکورہ کورس کے اختتام پر دوبارہ پریکٹیکل کورسز میں ڈالا گیا۔ ایلٹ مینڈیٹری کورس اور پرومیشن
 پریکٹیکل کورسز کی تکمیل ہونے پر جناب DPO صاحب نے تسلی بخش رپورٹ کے ساتھ کنفرمیشن کے لئے جناب RPO
 صاحب کو بمعہ جملہ ریکارڈ ارسال کیا۔ جناب RPO صاحب نے من سائل کو کنفرم کر کے نام پروموشن لسٹ E پر لایا۔ بعد
 میں OSI پروموشن کی DPC مقرر ہوئی۔ اور من سائل کو دیگر ASI کے ساتھ پروموشن کے لئے DPC میں
 approved ہوا۔ DPC سے قبل یا بعد میں میرے Batchmates میں سے کسی نے میرے خلاف کوئی اعتراض /
 درخواست نہیں کیا ہے۔ من OSI بمطابق قانون اور جناب آفسران بالا کے حکم پر بطور OSI ترقیاب ہو چکا ہے۔ جسمیں
 میرا کوئی ذاتی عمل داخل نہیں۔ اور نہ اس جملہ پراسیس میں کسی بھی Dealing Hands کیساتھ میل ملاپ کی ہے۔
 چونکہ ضلع ہذا میں اہم کلیدی پوسٹوں کے لئے کو ایف ایڈ ایڈا کاران کی کمی تھی۔ بدیں من OSI کے ساتھ ساتھ میرے دیگر
 Colleagues کو بھی پریکٹیکل کورسز کے ساتھ اضافی ڈیوٹیاں تفویض کی گئی تھی۔ مورخہ 31.07.2019 کو
 حسب الحکم جناب آفسران بالا صاحبان نے میری تعیناتی کورس D کے ساتھ اضافی ڈیوٹی انچارج PAS ہوئی۔ میرے
 تعیناتی سے قبل میرے PASI Batchmate بھی بطور انچارج PAS رہا ہے۔ اور بدستور PASI بطور انچارج
 PAS تعینات ہے۔

من سائل نے انچارج PAS کے تعینات ہونے پر جناب DPO صاحب آرڈر کنسل کرنے کے بابت پیش ہوا تھا۔ لیکن
 جناب DPO صاحب نے کام جاری رکھنے کا حکم دیا۔ اور من سائل نے آفسران بالا کی حکم کی تعمیل کی۔
 جہاں تک من سائل کی دیگر پندرہ Batchmates سے پہلے پرومیشن پریڈ پورا ہونے کا تعلق ہے۔ من سائل کو ایک
 سال Basi PASI Course کورس سے مستثنی ہو کر Mandatory Elite Training اور A, B, C & D
 کورسز بروقت مکمل کئے تھے۔ جبکہ سائل کے دیگر کچھ ساتھیوں کے A, B, C & D کورسز کے ساتھ مذکورہ ایلٹ ٹریننگ
 بھی مکمل ہو چکا ہے۔ اور کچھ کے ایلٹ ٹریننگ صرف رہتا ہے۔ اور ان کی بھی Nomination ہوئی ہے۔
 لہذا استدعا ہے۔ من سائل کے خلاف جاری شدہ شوکانوٹس بلا مزید کارروائی داخل دفتر کئے جانے کا حکم صادر فرما کر مشکور
 فرمادیں۔

العارض

سائل OSI دلاباز نمبر 36/B مہنگا پولیس لائن، ہنوں۔

7.02.2021

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My this order will dispose off departmental proceedings initiated against OSI Dilabaz Khan No.36/B of Bannu District Police, presently posted in Little Force, Khyber Pakhtunkhwa, under Police Rule 1975 (with amendment 2014) on the following grounds;

- That he, OSI Dilabaz Khan has apparently been promoted illegally by overtaking some of your batch mates obtaining seniority in contravention to existing rules in the subject promotion.
- That after perusal of the relevant record, it was found that during "D" Course he OSI Dilabaz Khan No.36/B was posted as Focal Person/Incharge Complaint Cell in contravention of the laid down rules. Record further reveals that he has superseded his 16 colleagues by manipulating his confirmation as ASI; bringing his name on promotion list "E" and promotion as Offg: SI after collusion with the dealing hands of DPO and RPO Offices Bannu while his other colleagues total in number 16 are still under probation.
- He was therefore required to show cause as to why the order with regard to his Offg: promotion as SI and bringing his name on promotion list "E" should not be withdrawn/set aside.

The said police officer was proceeded against departmentally under Police Rule 1975 and RPEO, Range Office Bannu was appointed as Inquiry Officer who conducted inquiry in the subject proceedings and submitted his findings, wherein, the E.O concluded that the said police officer OSI Dilabaz Khan is recommended to be reverted from the officiating rank of SI to the substantive rank of ASI as his colleagues are in the substantive rank of ASIs, being officiating promotion is not a regular promotion and can be withdrawn any time without any departmental proceedings and no appeal in this regard can be filed by the officer concerned. Besides, the E.O has further concluded that his remaining colleagues are also entitle for their confirmation from the said date of appointment i.e 13.02.2017 as that of the police officer concerned.

The said police officer was directed to appear before the undersigned on 21.12.2021 for personal hearing but he intentionally avoided to appear, hence lost the opportunity of personal hearing by way of "waiver".

Keeping in view the above, I, Sajid Ali Khan, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (with amendment 2014) hereby take the ex-parte action of his reversion from the officiating rank of SI to the substantive rank of ASI with immediate effect.

No. 6032-33/EC, dated Bannu the 22 /12/2021

Copies for information and necessary action to:-

1. The Commandant/Deputy Commandant, Little Force, Khyber Pakhtunkhwa Peshawar.
2. The District Police Officer, Bannu.

(SAJID ALI KHAN)PSP
Regional Police Officer,
Bannu Region, Bannu

AP 22/12/21

(SAJID ALI KHAN)PSP
Regional Police Officer,

(J)

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(J)

BANNU REGION

POLICE DEPTT:

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA, POLICE GAZETTE
PART-II ORDERS BY THE RPO BANNU REGION

NOTIFICATION

No. 126/EC, dated Bannu, the 22.08/2022

Subject: SENIORITY LIST OF CONFIRMED ASIs/SIs ON PROMOTION LIST "E" AS IT STOOD ON 01.03.2022

In continuation to this office revised seniority list of confirmed ASIs/SIs on list-E as stood on 27.07.2020, issued vide this office Notification No.2362/EC dated 27.07.2020, fresh seniority list of confirmed ASIs/SIs on list-E is hereby prepared in accordance with rules by excluding the names of those officers who have retired, died their natural death, embraced shahadat in the line of duty and those officers whose names have already been brought on promotion list-F as given below;

S.#	Name & No.	Date of Birth	Edu:	Date of Enlistment	Date of confirmation as ASI	Date of Entry to List "E"	Date of Promotion as OSI	Date of substantive promotion/ confirmation as SI	Remarks
1.	SI Sana Ullah No.B/49	15.04.1962	10 th	16.04.1980	27.08.2008	28.12.2015	21.11.2014	29.06.2018	
2.	OSI Muhammad Ali No.138/B	25.05.1962	10 th	20.07.1980	27.08.2008	28.01.2016	28.03.2016	-	
3.	SI Mir Daraz No.B/52	07.01.1964	10 th	28.07.1983	27.08.2008	28.12.2015	21.11.2014	29.06.2018	
4.	SI Sarfaraz Khan No.B/17	02.01.1965	FA	11.10.1983	27.08.2008	20.03.2014	28.03.2016	06.10.2021	
5.	SI Syed Ayaz No.B/27	07.12.1965	10th	22.03.1987	27.08.2008	28.12.2015	21.11.2014 28.03.2016	06.10.2021	
6.	SI Aman Ullah No.B/28	01.04.1980	M.A	03.03.2009	03.03.2009	09.05.2012	10.09.2013	06.10.2021	
7.	OSI Umer Irfan No.49/B	08.04.1983	FSc	25.3.2009	25.3.2009	20.11.2012	10.9.2013	-	Dismissed from service by SSP Operations Peshawar vide Order Endst: No.126-31/PA dated 20.01.2017.
8.	OSI Allah Nawaz No.67/B	04.04.1981	MA	06.04.2009	06.04.2009	09.05.2012	28.11.2013	-	
9.	OSI Binyamin No. 86/B	04.02.1985	BSc	26.03.2010	26.03.2010	29.05.2013	28.03.2016	-	
10.	SI Waheed Noor No.B/73	01.04.1990	FA	02.08.2010	02.08.2010	11.10.2013	28.03.2016	09.11.2021	
11.	SI Muhammad Rashid No.B/09	01.03.1989	FA	11.08.2010	11.08.2010	09.10.2013	28.03.2016	09.09.2020	

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11	OSI Ihsanullah No.94/B	01.01.1974	BA	25.08.2010	25.08.2010	11.10.2013	28.03.2016	-	
12	SI Rizwanullah No.B/32	15.10.1986	FA	28.09.2010	28.09.2010	09.10.2013	28.03.2016	06.10.2021	
13	SI Hayat Ali Amjid No.B/35	01.09.1979	MA	19.01.2011	19.01.2011	19.08.2014	28.03.2016	06.10.2021	
14	SI Asmatullah No.B/36	05.06.1983	MSc	19.01.2011	19.01.2011	08.05.2014	28.03.2016	06.10.2021	
15	SI Mohammad Kamran No.B/39	19.09.1988	BSc	19.01.2011	19.01.2011	08.05.2014	28.03.2016	-	
16	OSI Irfanullah No.106/B	01.04.1989	BSc	22.01.2011	22.01.2011	08.05.2014	28.03.2016	-	
17	OSI Raham Dil Khan No.120/B	24.08.1976	MA	10.02.2011	10.02.2011	08.05.2014	28.03.2016	-	
18	OSI Hamidullah No.112/B	28.03.1984	BA	10.02.2011	10.02.2011	08.05.2014	28.03.2016	06.10.2021	
19	SI Furqan Javed No.B/74	01.07.1984	BA	10.02.2011	10.02.2011	08.05.2014	28.03.2016	-	
20	OSI Damsaz Khan No.121/B	05.01.1985	M.Com	10.02.2011	10.02.2011	08.05.2014	28.03.2016	06.10.2021	
21	SI Mohammad Zahir No.B/40	01.04.1986	BSc/LLB	10.02.2011	10.02.2011	08.05.2014	28.03.2016	06.10.2021	
22	OSI Munawar Jan No. 38/B	02.03.1963	10th	03.12.1981	04.03.2011	28.12.2015	21.11.2014 28.03.2016	-	
23	OSI Mohammad Ishaq No.45/B	10.01.1963	BA	23.12.1986	12.07.2011	28.12.2015	28.03.2016	-	
24	SI Nasirud-Din No.B/41	18.03.1969	10 th	22.03.1987	21.12.2011	20.03.2014	28.03.2016	06.10.2021	
25	SI Safirullah No.B/42	09.09.1965	10 th	17.03.1986	22.02.2013	31.12.2015	21.11.2014 22.12.2016	06.10.2021	
26	SI Ibniaz Khan No.B/44	10.03.1968	FA	01.04.1990	01.03.2013	20.03.2014	22.12.2016	06.10.2021	
27	OSI Noor Jehan Shah No.72/B	25.07.1963	FA	24.12.1985	19.05.2013	14.12.2016	22.12.2016	-	
28	SI Abdullah Khan No.B/45	14.08.1963	10 th	22.03.1987	31.05.2013	18.02.2016	06.02.2019	06.10.2021	
29	SI Sardar Ali No.B/47	10.04.1964	FA	23.12.1986	31.05.2013	28.12.2015	12.12.2019	06.10.2021	
30	SI Abdul Majid No.B/75	25.07.1965	9 th	04.08.1983	31.05.2013	28.12.2015	09.08.2018	09.11.2021	
31	SI Sartaj Jehan No.B/48	09.02.1967	10 th	23.12.1986	31.05.2013	11.01.2016	06.02.2019	06.10.2021	
32	SI Fidauallah No.B/54	15.07.1968	10th	23.12.1986	31.05.2013	15.03.2016	06.02.2019	06.10.2021	
33	SI Abdul Saboor No.B/56	16.03.1969	FA	15.06.1988	31.05.2013	23.06.2016	09.08.2018	06.10.2021	
34	OSI Saadullah No.79/B	06.09.1970	10th	10.12.1988	31.05.2013	20.03.2014	12.12.2019	-	
35	SI Barkatullah No.B/57	09.01.1966	10 th	24.12.1985	06.09.2013	14.12.2016	06.02.2019	06.10.2021	
36	SI Hidayat Ullah No.B/58	10.03.1970	F.A	11.07.1991	06.09.2013	20.03.2014	12.12.2019	06.10.2021	
37	SI Gul Muhammad No.B/59	01.07.1970	F.A	30.12.1989	06.09.2013	28.08.2014	09.08.2018	06.10.2021	
38	SI Sajid Khan No.B/60	16.04.1974	F.A	04.05.1993	06.09.2013	20.03.2014	09.08.2018	06.10.2021	
39	SI Saeed Nawaz No.B/61	25.09.1965	10th	19.04.1984	13.12.2013	18.02.2016	06.02.2019	06.10.2021	
40	SI Rustum Khan No.B/62	10.11.1965	10 th	23.12.1986	13.12.2013	27.01.2016	06.02.2019	06.10.2021	
41	SI Sher Mali Khan No.B/63	01.03.1967	10 th	03.04.1990	13.12.2013	28.08.2014	12.12.2019	06.10.2021	
42	SI Kamran Ali Shah No.B/64	14.03.1968	B.Com	11.07.1991	13.12.2013	20.03.2014	09.08.2018	06.10.2021	
43	SI Razaulla No.B/65	30.04.1975	M.A	26.12.1996	13.12.2013	20.03.2014	09.08.2018	06.10.2021	

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45.	SI Abdul Samad No.B/66	15.09.1980	MA	02.10.2004	19.12.2013	09.03.2016	09.08.2018	06.10.2021	
46.	SI Rahatullah Shah No.B/67	12.09.1984	B.A	04.02.2014	04.02.2014	22.02.2019	12.12.2019	06.10.2021	
47.	SI Muhammad Bilal No.B/68	04.03.1989	M.A	04.02.2014	04.02.2014	22.02.2019	12.12.2019	06.10.2021	
48.	SI Qudratullah No.B/69	20.10.1989	F.A	04.02.2014	04.02.2014	22.02.2019	12.12.2019	06.10.2021	
49.	SI Imran Khan No.B/70	15.11.1990	F.Sc	04.02.2014	04.02.2014	22.02.2019	25.11.2020	06.10.2021	
50.	OSI Fidaullah No.117/B	29.03.1991	F.A	04.02.2014	04.02.2014	22.02.2019	25.11.2020	-	
51.	OSI Mumtaz Khan No. 115/B	05.04.1991	F.A	04.02.2014	04.02.2014	22.02.2019	25.11.2020	-	
52.	SI Arifullah Khan No.B/76	02.01.1992	B.A	04.02.2014	04.02.2014	22.02.2019	25.11.2020	09.11.2021	
53.	SI Mir Sahib Khan No.B/71	14.04.1968	10 th	21.06.1987	30.12.2015	29.03.2016	06.02.2019	06.10.2021	
54.	SI Islam Noor No.B/72.	20.03.1964	FA	24.12.1985	20.01.2016	29.03.2016	06.02.2019	06.10.2021	
55.	SI Niaz Muhammad No.B/86	24.04.1983	BA	11.02.2002	06.06.2016	22.06.2016	09.08.2018	09.11.2021	
56.	OSI Ghulam Mohammad No.158/B.	28.11.1964	FA	30.04.1983	01.07.2016	14.12.2016	06.02.2019	-	
57.	SI Muhammad Azeem Shah No.B/77	04.04.1965	10 th	23.06.1986	01.07.2016	13.01.2017	06.02.2019	09.11.2021	
58.	SI Shakirullah No.B/78	11.02.1966	FSc	11.01.1986	01.07.2016	11.08.2016	06.02.2019	09.11.2021	
59.	SI Muhammad Zahir Shah No.B/79	22.01.1967	FA	23.12.1986	01.07.2016	22.08.2016	06.02.2019	09.11.2021	
60.	SI Shafiqullah No.B/87	24.04.1982	BA	15.04.2001	31.12.2016	07.02.2017	28.02.2019	09.11.2021	
61.	ASI Dilabaz Khan No.36/B	15.02.1978	M.A	13.02.2017	13.02.2017	20.07.2020	25.11.2020	-	Reverted to the substantive rank of ASI vide this office Order Endst: No.6032-33/EC dated 22.12.2021.
62.	ASI Nauman Khan No.71/B	14.02.1984	MBA	13.02.2017	13.02.2017	31.12.2021	-	-	
63.	ASI Muhammad Momin Khan No.62/B	07.03.1986	F.Sc	13.02.2017	13.02.2017	31.12.2021	-	-	
64.	ASI Nasibullah Shah No.44/B	06.03.1991	M.Sc	13.02.2017	13.02.2017	31.12.2021	-	-	
65.	ASI Asim No.76/B	02.04.1991	B.S	13.02.2017	13.02.2017	31.12.2021	-	-	
66.	ASI Wajid-ur-Rehman No.65/B	26.04.1991	M.Sc	13.02.2017	13.02.2017	31.12.2021	-	-	
67.	ASI Muhammad Alam Khan No.55/B	08.04.1994	M.Sc	13.02.2017	13.02.2017	31.12.2021	-	-	
68.	SI Amir Jan No.B/80	21.02.1968	F.A	24.03.1987	21.06.2017	02.08.2018	06.02.2019	09.11.2021	
69.	SI Rehmat Ullah No.B/81	25.04.1968	10 th	01.04.1990	21.06.2017	02.08.2018	06.02.2019	09.11.2021	
70.	OSI Muhammad Ayaz No.30/B	18.06.1968	F.A	22.03.1987	21.06.2017	02.08.2018	12.12.2019	-	
71.	SI Muhammad Nawaz No.B/82	02.11.1968	F.A	01.10.1989	21.06.2017	02.08.2018	09.08.2018	09.11.2021	
72.	OSI Ghulam Saboor No.20/B	11.11.1968	10 th	27.09.1988	21.06.2017	02.08.2018	06.02.2019	-	
73.	SI Mohabbat Khan No.B/83	26.03.1969	10 th	21.06.1987	21.06.2017	02.08.2018	12.12.2019	09.11.2021	
74.	SI Ghausullah No.B/84	15.11.1969	10 th	19.12.1987	21.06.2017	02.08.2018	12.12.2019	09.11.2021	
75.	SI Khalid Zaman No.B/85	09.01.1970	F.A	10.12.1988	21.06.2017	02.08.2018	09.08.2018	09.11.2021	
76.	OSI Farid Khan No.27/B	20.07.1970	10 th	11.07.1991	21.06.2017	02.08.2018	09.08.2018	-	

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77.	OSI Ghani Rahman No.15/B	12.08.1971	10 th	01.04.1990	21.06.2017	02.08.2018	12.12.2019	-	
78.	OSI Gul Ayub No.77/B	17.04.1963	10 th	02.10.1983	27.09.2018	27.09.2018	12.12.2019	-	
79.	OSI Irshad Ali No.16/B	06.11.1963	10 th	01.02.1985	27.09.2018	27.09.2018	25.11.2020	-	
80.	OSI Mehrab Khan No.104/B	31.03.1965	10 th	18.03.1986	27.09.2018	27.09.2018	06.02.2019	-	
81.	OSI Rustum Khan No.144/B	03.12.1965	10 th	23.12.1986	27.09.2018	27.09.2018	12.12.2019	-	
82.	OSI Rasool Zaman No.75/B	02.01.1966	10 th	16.03.1985	27.09.2018	27.09.2018	12.12.2019	-	
83.	OSI Muhammad Rehman No.66/B	03.04.1966	10 th	23.12.1986	27.09.2018	27.09.2018	12.12.2019	-	
84.	OSI Said Azam No.59/B	01.01.1967	10 th	23.12.1986	27.09.2018	27.09.2018	25.11.2020	-	
85.	OSI Gul Janan No.131/B	15.01.1968	10 th	18.03.1986	27.09.2018	27.09.2018	12.12.2019	-	
86.	OSI Hameed Ullah No.46/B	20.03.1968	M.A	22.06.1991	27.09.2018	27.09.2018	25.11.2020	-	
87.	OSI Nizam Khan No.61/B	04.03.1969	10 th	10.12.1988	27.09.2018	27.09.2018	12.12.2019	-	
88.	ASI Abdur Rasheed No.70/B	10.08.1969	10 th	01.10.1989	27.09.2018	27.09.2018	-	-	
89.	OSI Mehrullah No.84/B	1970	9 th	19.10.1988	27.09.2018	27.09.2018	12.12.2019	-	
90.	ASI Munawar Khan No.9/B	15.02.1971	10 th	01.10.1989	27.09.2018	27.09.2018	-	-	
91.	OSI Ghaffar Ali No.78/B	22.02.1971	10 th	11.07.1991	27.09.2018	27.09.2018	12.12.2019	-	
92.	OSI Qaza Khan No.5/B	08.04.1971	10 th	27.12.1989	27.09.2018	27.09.2018	12.12.2019	-	
93.	OSI Abdul Hakim No.151/B	01.02.1972	10 th	03.01.1991	27.09.2018	27.09.2018	12.12.2019	-	
94.	ASI Rasool Khan No.18/B	04.04.1962	10 th	21.12.1980	12.12.2019	12.12.2019	-	-	
95.	ASI Muhammad Tahir No.57/B	20.12.1964	10 th	20.06.1987	12.12.2019	12.12.2019	-	-	
96.	ASI Pasham Khan No.53/B	21.12.1964	FA	07.03.1985	12.12.2019	12.12.2019	-	-	
97.	ASI Muhammad Shah No.14/B	03.04.1966	10 th	24.12.1986	12.12.2019	12.12.2019	-	-	
98.	ASI Almar Khan No.80/B	06.02.1968	10 th	23.12.1986	12.12.2019	12.12.2019	-	-	
99.	ASI Nawab Khan No.85/B	25.11.1968	10 th	10.12.1988	12.12.2019	12.12.2019	-	-	
100.	ASI Asmat Ullah No.50/B	14.06.1969	10 th	03.01.1991	12.12.2019	12.12.2019	-	-	
101.	ASI Muhammad Yousaf No.82/B	10.03.1970	10 th	01.07.1989	12.12.2019	12.12.2019	-	-	
102.	ASI Muhammad Ajmal No.41/B	15.06.1970	10 th	01.10.1989	12.12.2019	12.12.2019	-	-	
103.	ASI Ghulam Razzaq No.51/B	26.01.1972	10 th	11.07.1991	12.12.2019	12.12.2019	-	-	
104.	ASI Abdul Jalil No.83/B	01.04.1972	10 th	19.12.1995	12.12.2019	12.12.2019	-	-	
105.	ASI Saif ur Rehnab No.64/B	01.05.1972	10 th	28.12.1991	12.12.2019	12.12.2019	-	-	
106.	ASI Karim Khan No.7/B	17.09.1964	10 th	20.05.1984	10.02.2020	18.02.2020	-	-	
107.	ASI Abdul Qayyum No.81/B	21.09.1965	10 th	22.03.1987	10.02.2020	18.02.2020	-	-	
108.	ASI Moin Ullah No.88/B	10.03.1966	10 th	17.04.1984	10.02.2020	10.03.2020	-	-	
109.	ASI Abdul Jamil No.35/B	10.07.1967	10 th	01.10.1989	10.02.2020	18.02.2020	-	-	
110.	ASI Abdul Jalil No.40/B	05.12.1968	10 th	01.10.1989	10.02.2020	18.02.2020	-	-	
111.	ASI Ilam Din No.87/B	10.02.1969	10 th	10.12.1988	10.02.2020	18.02.2020	-	-	

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112.	ASI Shafeed Ullah No.4/B	14.07.1970	10 th	01.10.1989	10.02.2020	18.02.2020	-	-	-
113.	ASI Imtiaz Khan No.32/B	01.04.1971	10 th	23.12.1991	10.02.2020	18.02.2020	-	-	-
114.	ASI Sher Ali No.102/B	28.04.1971	FA	01.10.1989	10.02.2020	10.03.2020	-	-	-
115.	ASI Sami Ullah No.123/B	22.05.1971	10 th	01.07.1989	10.02.2020	18.03.2020	-	-	-
116.	ASI Farid Ullah No.92/B	12.02.1972	10 th	11.07.1991	10.02.2020	10.03.2020	-	-	-
117.	ASI Mir Tajum No.111/B	07.03.1974	FA	03.04.1993	10.02.2020	10.03.2020	-	-	-
118.	ASI Abdul Hameed No.28/B	01.04.1975	MA	11.07.1995	10.02.2020	18.02.2020	-	-	-

Regional Police Officer
Bannu Region,
Bannu
Ph: No.0928-9270076
Fax No.0928-9070075
Email: rpobannu2@gmail.com

SUBJECT: APPEAL AGAINST THE ORDER OF DIG/BANNU ISSUED VIDES ENDORSEMENT NO. 6032-33/EC DATED 22.12.2021 (COPY IS ATTACHED). / CPO order

R/Sir,

With due reverence the applicant submit the following submissions against the impugned order passed by the Regional Police Officer, Bannu Region, Bannu, Bannu vide his order endorsement No. 6032-33/EC dated 22.12.2021, wherein the applicant has been reverted to the substantive rank of ASI with immediate effect.

FACTS.

1. The applicant was recruited as constable with effect from 23.08.1999, qualified the lower school course in term ending 20.09.2006 and Intermediate College courses in term ending 20.03.2014 successfully from PTC, Hangu.
2. That vide letter No. 898-923/E-III dated 13.02.2017, the applicant was included in successful candidates against the (In service quota 19%) and his other colleagues against the (General quota 25 %) in direct recruitment as ASI through Public Service Commission, Khyber Pakhtunkhwa. They were appointed as PASIs vide RPO, Bannu Region, Bannu order No. 732-36/EC dated 23.02.2017 (Annexure A & B are attached). Both quotas have been maintained by the Public Service Commission/CPO, Peshawar separately.
3. That my other colleague of general quota were selected for Basic PASI course at PTC/Hangu, where as the applicant was exempted from PASI course being already qualified the lower school course and intermediate college course vide PTC/Hangu Memo No. 573/EC dated 27.04.2017.
4. That a separate practical training program A, B, C & D under Police Rules 19-25 was chalked out for the applicant respectively. The Commandant PTC/Hangu was also granted NOC to continue A, B, C & D training program.
5. That during the above mentioned courses an implementation on standing order of Elite Course for PASI was started and successfully completed the 06 months Elite Course.
6. That after completion of all courses satisfactorily and fulfilling on all the codel/legal formalities, the DPO, Bannu vide his Memo No. 7490 dated 22.06.2020 recommended the applicant for confirmation/bring his name on promotion list "E" (copy is attached at annexure C).
7. The on recommendation of DPO, Bannu, the RPO, Bannu Region, Bannu issued my confirmation order and brought my name on promotion list "E" vide his order endorsement No. 2264/EC dated 20.07.2020. (Copy is attached at annexure D)
8. That in December 2020, DPC meeting was scheduled by the RPO, Bannu Region, Bannu, senior and junior colleagues along with the applicant was called in the said DPC meeting for consideration of my name for promotion to the rank of officiating Sub Inspector and accordingly my name was approved for the said promotion. The

RPO, Bannu Region, Bannu issued promotion order vide his order endorsement No. 4442-45/EC dated 17.12.2020 (Copy is attached at annexure E).

9. After the promotion of Offt: Sub Inspector, the applicant was transferred to Elite Foce, Khyber Pakhtunkhwa for the completion of one year other unit posting tenure which is compulsory for confirmation as Sub Inspector and still serving in Elite Force.
10. That RPO, Bannu Region, Bannu issued a Show Cause Notice against me alleging my promotion "as wrong" and I submitted proper reply to the Show Cause Notice. Thereafter it was alleged that I was summoned to the orderly room held on 21.12.2021 but actually the applicant was not informed in this regard (copy of letter and Parwana are attached at Annexure F & G).
11. That an ex-parte action was taken against me on the pretext of not attending the orderly room held on 21.12.2021 in spite of the fact that no such information was conveyed to me through any way and issued impugned order of my reversion without any plausible cause.
12. That I also submitted a review petition against the said order which was also turned down by the authority (Copy is attached at Annexure F).
13. That since I am already senior from my colleague according to Police Rules 12-2(3) and I was awarded regular promotion by the competent authority in DPC meeting after fulfilling of the basic criteria as devised for the promotion, he did not affect seniority of colleague or cross them, as seniority list "E" is worth perusal. It is pertinent to mentioned here that junior most colleagues of me have been promoted as Officiating SI and some of them were confirmed who affected my seniority while I was reverted without any reason which is injustice.
14. That my illegal reversion affected my one year other unit posting tenure in Elite Force and also from the date of reversion my junior colleagues were granted substantive promotion as Sub Inspector in different occasions. (Attached promotion List E is worth perusal).

GROUND:

1. That I have appointed as PASI on the recommendation of Public Service Commission under (In Service graduate constable/Head constable 19% quota) vide letter & order are quoted above.
2. That I have exempted from the basic PASI course as I have already qualified lower School Course and Intermediate College Course vide Commandant PTC Hangu letter No. quoted above.
3. That according to Police Rules 19-25 (2) on successfully completing the basic PASI course i.e. Lower School Course & Intermediate College Course at Training College, the officer will be posted in district for practical training A, B, C & D, (as I was already qualified and exempted from the basic course was chalked out the said practical program for me. I was also granted NOC to continue the said program by the

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Commandant Police Training College, Hangu vide his letter No. 1488/EC dated 07.11.2017. (Copy is attached).

4. That I was completed successfully/satisfactorily A, B, C & D and also qualified Elite Basic Training of 06 months for PASI, after completion of 3 years probations period comprising of the said courses successfully, I was recommended for confirmation to the Regional Police Officer, Bannu Region, Bannu vide DPO letter No. 7490 dated 20.06.2020 as mentioned in laid down Police Rules 19-25 (5).
5. That on recommendation of DPO, Bannu, the Regional Police Officer, Bannu Region, Bannu issued confirmation order and brought his name on promotion list "E" vide his order Endst: No. 2264/EC dated 20.02.2020. The DPO, Bannu also issued notification vide Endst: No. 9181-85 dated 22.07.2020.
6. That on 25.11.2020 a DPC meeting for promotion to the rank of Officiating Sub Inspector was scheduled at Region Office, Bannu and I along with my Junior and senior colleagues on promotion list "E" was called vide RPO Office letter No. 4060-65/EC dated 19.11.2020, on fulfilling the required criteria my name was approved and promoted to the rank of Offt: Sub Inspector vide RPO Order Endst: No. 4442-45/EC dated 17.12.2020 and DPO, Bannu notification No. 16040-43 dated 17.12.2020.
7. That no one of my colleagues objected my promotion which showed that I have not over taken my colleagues and it is also worth mentioned in promotion list "E" but all senior and junior colleagues who were promoted with me on the same date as Offt: Sub SI were granted regular promotion to the rank substantive sub inspector and other junior most were promoted as Offt: SI, the substantive promotion over took me in seniority.
8. That on 04.06.2021 a letter was issued for DPC meeting for the substantive promotion of Officiating Sub inspector vide Region office Memo No. 2132-41/EC dated 04.06.2021 and my name was mentioned at S/No. 54 for the said promotion, later on I was issued show cause notice and reverted illegally while other colleagues mentioned in the said letter were promoted to the rank of substantive promotion of SI to the S/No. 61 who are junior to me. (letter is attached)
9. That in view of the above circumstance on what ground I was issued Show Cause Notice and reverted as I was promoted by the competent authority after fulfilling on the required criteria.
10. That my name was put in orderly room scheduled on 21.12.2021 but intentionally was not informed which is clear from the call letter issued from Region Office vide No. 5987-90/EC dated 20.12.2021 the SP/EF, Bannu Region, Bannu was not addressed and also his name was not put in DPO Urdu Parwana issued for Control Room, Bannu (Both are attached). I also stated solemnly that I was not informed on any way by the any one.

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Commandant Police Training College, Hangu vide his letter No. 1488/EC dated 07.11.2017. (Copy is attached).

4. That I was completed successfully/satisfactorily A, B, C & D and also qualified Elite Basic Training of 06 months for PASI, after completion of 3 years probations period comprising of the said courses successfully, I was recommended for confirmation to the Regional Police Officer, Bannu Region, Bannu vide DPO letter No. 7490 dated 20.06.2020 as mentioned in laid down Police Rules 19-25 (5).
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7. That no one of my colleagues objected my promotion which showed that I have not over taken my colleagues and it is also worth mentioned in promotion list "E" but all senior and junior colleagues who were promoted with me on the same date as Offt: Sub SI were granted regular promotion to the rank substantive sub inspector and other junior most were promoted as Offt: SI, the substantive promotion over took me in seniority.
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9. That in view of the above circumstance on what ground I was issued Show Cause Notice and reverted as I was promoted by the competent authority after fulfilling on the required criteria.
10. That my name was put in orderly room scheduled on 21.12.2021 but intentionally was not informed which is clear from the call letter issued from Region Office vide No. 5987-90/EC dated 20.12.2021 the SP/EF, Bannu Region, Bannu was not addressed and also his name was not put in DPO Urdu Parwana issued for Control Room, Bannu (Both are attached). I also stated solemnly that I was not informed on any way by the any one.

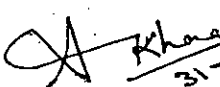
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11. That I was reverted on the ground that I was intentionally ignored the orderly room while he was not informed as mentioned above.
12. That I was illegally reverted without any plausible grounds and affected my other unit posting tenure in Elite Force which is compulsory for confirmation in the Rank of Sub Inspector.
13. That one year officiating period is also mandatory for promotion to the substantive rank of SI and such like illegal step can affect the service career and future of officer.
14. That during my reversion period my junior colleagues granted promotion to the substantive rank of Sub Inspector who over took my seniority, as worth clear from the promotion list "E".
15. That my service career badly affected and mentally tortured by taking illegal step against me.

Prayers:

In view of the above circumstance, the impugned order may kindly be set aside, my officiating rank of SI may kindly be restored from the date of reversion and considered my name for the regular promotion to the substantive rank of SI in merit position mentioned in list as I already fulfill on the required criteria of Substantive promotion of SI please.

Dak 31-12-2021


31-12-2022
(Dilabaz Khan)

ASI, No. 36/B, Bannu Region,
Mob No. 03329764493, 03459771660.



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

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ORDER

This order is hereby passed to dispose of Departmental Appeal under Rule 11 of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by ASI Dilabaz Khan No. 36/B (the then SI).

The petitioner was awarded penalty of reversion from officiating rank of Sub-Inspector to substantive rank of ASI by Regional Police Officer, Bannu vide order Endst: No. 6032-33/EC. dated 22.12.2021 on the following charges:-

- (i) That he has apparently been promoted illegally by overtaking some of his batch mates obtaining seniority in contravention to existing rules in the subject promotion.
- (ii) That after perusal of the relevant record, it was found that during "D" course he was posted as Focal Person/Incharge Complaint Cell in contravention of the laid down rules. Record further reveals that he superseded his 16 colleagues by manipulating his confirmation as ASI; bringing his name on promotion List "E" and promotion as Offg: ASI after collusion with the dealing hands of DPO and RPO offices Bannu while his other colleagues total in number 16 are still under probation.
- (iii) He was therefore issued Show Cause as to why the order with regard to his Offg: promotion as SI and bringing his name on promotion List "E" should not be withdrawn/set aside.

Meeting of the Appellate Board was held on 29.06.2022, wherein the petitioner was present and heard in detail. During hearing the petitioner could not produce cogent evidence of his innocence. According to Section-4.2 (b) of the Khyber Pakhtunkhwa Police Rules 1975 (amended 2014), reversion from an officiating rank is not a punishment. Therefore, the Board unanimously decided that his revision petition is hereby rejected as without merit.

Sd/-
SABIR AHMED, PSP
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. SI/1469-75/22, dated Peshawar, the 6/7/2022.

Copy of the above is forwarded to the:

1. Regional Police Officer, Bannu. One Service Book, one Service Roll, one Fauji Missal and one enquiry file (14-pages) of the above named appellant received vide your office Memo: No. 1391/EC, dated 30.03.2022 and No. 2115/EC, dated 24.05.2022 is returned herewith for your office record.
2. District Police Officer, Bannu.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-III, CPO Peshawar.
7. Officer concerned.

(DR. ZAHID ULLAH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

M (48)

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.**

No. CP/2022 _____ Date: Peshawar 22 Feb 2022

To: The Capital City Police Officer,
Peshawar.
All Regional Police Officers,
Khyber Pakhtunkhwa

Subject: **ANOMALIES RELATED TO CONFIRMATION STATUS AWARDED TO NUII
INSPECTORS.**

Memo: The Competent Authority has directed to streamline the seniority lists of NUII Inspectors and confirmed Sub Inspectors already on List 'I'. It has been observed that due to following reasons the problems arise in the seniority lists:

- I. In majority of the cases received to CPO for admission in the centralized seniority list, it has been observed that the confirmation in the rank of Sub Inspectors is considered from the date of DPC instead of completion of mandatory period of two years for confirmation as per Police Rules 13 18.
- II. Similarly, Police Rules 11(102) provides for two years mandatory period as SII/Other Units.

In order to streamline the seniority lists, the Competent Authority has directed that all DPC/CPO should strictly follow Police Rules 13 18 for confirmation in the substantive rank and revise it accordingly, if there exists any anomaly. The requisite rules are quoted below for ready reference:

- a. **Police Rules 13 18.** All Police Officers promoted in rank shall be on probation for two years, provided that the appointing authority may, by a special order in each case, permit periods of officiating service to count towards the period of probation. On the completion of the probationary period a report shall be rendered to the authority empowered to confirm the promotion who shall either confirm the officer or revert him. In no case shall the period of probation be extended beyond two years and the confirming authority must arrive at a definite decision within that period whether officer should be confirmed or reverted.
- b. **Police Rules 13 102.** No Sub Inspector shall be confirmed in a substantive vacancy unless he has been tested for at least a year as an officiating Sub Inspector in independent charge of a Police Station, a notified Police Post or as in-charge Investigation of a Police Station or in Counter Terrorism Department. According amendment Police Rules 2017, provided further that he shall also have to spend one year in any other Unit including the period spent on long leave, deputation or promotional training contracts by 'Upper College Course'.

The report may be communicated to this office within one week i.e. 08.03.2022

positively

Saim
Sd/-
(SAJIB AHMED) PSP
Additional Inspector General of Police,
HQs Khyber Pakhtunkhwa,
Peshawar.



OFFICE OF THE
THE INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

STANDING ORDER NO. 3/2015

Mandatory Training in Specialised Schools

This Standing Order is issued under Article 10(3) of Police Order 2002 in pursuance of the Police Policy Board decision taken in its 18th meeting held on 13th August 2015.

2. **Aim** - This Standing Order aims at enhancing the capacity of police officers in such essential skills that would enable them to work effectively and efficiently. KP Police have established a number of special need schools that are imparting valuable training courses to lower and upper subordinates. It is therefore essential that officers take advantage of these training facilities.

Specific minimum frame of upper subordinates to the specialised schools needs to be linked with promotion to the next rank.

3. **Mandatory Training for promotion of Upper Subordinates** - An Upper Subordinate shall not be confirmed and promoted to the next higher rank unless he/she is confirmed in other mandatory requirements, completes and qualifies training courses and obtain a total of nine (9) marks in one or more of the following schools:

- A. Police School of Investigation Peshawar
- B. Police School of Intelligence Abbottabad.
- C. Police School of Tactics Peshawar
- D. Police School of Explosive Handling Muzaffargarh
- E. Police School of Information Technology Peshawar
- F. Police School of Public Disorder and Riot Management Mardan

4. A training course of one week duration at any of the above schools will carry one (1) mark while a two week course will carry two (2) marks. A candidate has to successfully complete and qualify each of the courses.

An Upper Subordinate may choose different courses at any school but will not repeat the same course.

From: The Regional Police Officer,
Bannu Region, Bannu

- To:
- 1) The Deputy Inspector General of Police,
CTD, Khyber Pakhtunkhwa Peshawar
 - 2) The District Police Officers, Bannu & Lakki Marwat
 - 3) The SsP/Investigation, Bannu & Lakki Marwat
 - 4) The SsP/FRP, CTD & Elite Force, Bannu Region

No. 294-30/EC, dated Bannu the 19/01/2022

Subject: DPC FOR SUBSTANTIVE PROMOTION AS SIS

Memo: In continuation to this office letters No.6120-27/EC dated 28.12.2021 and No.234-41/EC dated 18.01.2022 and submit fresh position of departmental proceedings, if any, one/one year period/tenure under Police Rules 13.10(2) and by name mandatory training courses with duration, name of specialized schools and marks obtained in the said courses under Police Rules 19.25(A), being must for the subject promotion/confirmation, in respect of the following police officers may be submitted to this office within three days positively so that a DPC meeting could be held well in time please;

S.#	Name & No.	Present posting
1.	OSI Allah Nawaz No.67/B	Operation Staff Bannu
2.	OSI Binyamin No. 86/B	FRP, KP
3.	OSI Ihsanullah No. 94/B	FRP, KP
4.	OSI Raham Dil Khan No. 120/B	Operation Staff Bannu
5.	OSI Hamidullah No. 112/B	EF, KP
6.	OSI Damsaz Khan No. 121/B	FRP, KP
7.	OSI Munawar Jan No. 38/B	Operation Staff Bannu
8.	OSI Mohammad Ishaq No.45/B	CTD, KP
9.	OSI Noor Jehan Shah No.72/B	Inv: Staff Bannu
10.	OSI Saadullah No.79/B	Inv: Staff Bannu
11.	OSI Fidaullah No. 117/B	CTD, KP
12.	OSI Mumtaz Khan No. 115/B	Operation Staff Bannu
13.	OSI Ghulam Mohammad No.158/B	Inv: Staff Lakki
14.	OSI Muhammad Ayaz No.30/B	Operation Staff Lakki Marwat
15.	OSI Ghulam Saboor No.20/B	FRP, KP
16.	OSI Farid Khan No.27/B	Operation Staff Bannu
17.	OSI Ghani Rahman No:15/B	CTD, KP
18.	OSI Gul Ayub No.77/B	Operation Staff Bannu

Service records in respect of police officers mentioned at S.No.1, 4, 5, 7, 8, 11, 12, 13, 16, 17 & 18 as mentioned above, of your districts/units may also be submitted to this office for further processing.

Matter Most Urgent and needs top priority please.

(OFFICE SUPDT-)
For Regional Police Officer,
Bannu Region, Bannu

19/01/22

From: The Regional Police Officer,
Bannu Region, Bannu

To: 1) The District Police Officer, Bannu
2) The District Police Officer, Lakki Marwat
3) The District Police Officer, NWTD
4) The Additional SP Bannu
5) The SP/Special Branch, Bannu.
6) Office Superintendent, Range Office Bannu

No. 2503-28/EC, dated Bannu the 20/06/2022

Subject: **DPC FOR SUBSTANTIVE PROMOTION AS SIs.**

Memo: In continuation to this office order Endst: No. 1929-34/EC dated 13.05.2022, it is intimated that DPC meeting of confirmed ASIs/Offg: SIs of Bannu Region on list-E for substantive promotion as SIs will be held on **Thursday 23.06.2022 at 11:00 hours** in office of the undersigned, wherein, cases of the following confirmed ASIs/Offg: SIs will be considered under the relevant rules;

S.#	Name, Rank & No.	Present Posting
1.	OSI Allah Nawaz No.67/B	Operation Staff Bannu
2.	OSI Binyamin No.86/B	Operation Staff Lakki Marwat
3.	OSI Ihsan Ullah No.94/B	Investigation Staff Bannu
4.	OSI Irfan Ullah No.106/B	Operation Staff Lakki Marwat
5.	OSI Raham Dil Khan No.120/B	Operation Staff Bannu
6.	OSI Hamid Ullah No.112/B	Elite Force, KP
7.	OSI Damsaz Khan No.121/B	Operation Staff Lakki Marwat
8.	OSI Mohammad Ishaq No.45/B	CTD, KP
9.	OSI Noor Jehan Shah No.72/B	Operation Staff Bannu
10.	OSI Saadullah No.79/B	Operation Staff Bannu
11.	OSI Fidaullah No.117/B	CTD, KP
12.	OSI Mumtaz Khan No. 115/B	Operation Staff Bannu
13.	OSI Ghulam Mohammad No.158/B	Investigation Staff Lakki Marwat
14.	OSI Muhammad Ayaz No.30/B	Operation Staff Lakki Marwat
15.	OSI Ghulam Saboor No.20/B	Operation Staff Lakki Marwat
16.	OSI Farid Khan No.27/B	Operation Staff Bannu
17.	OSI Ghani Rahman No.15/B	CTD, KP
18.	OSI Gul Ayub No.77/B	Investigation Staff Bannu
19.	OSI Irshad Ali No.16/B	Special Branch, KP
20.	OSI Mehrab Khan No.104/B	CTD, KP
21.	OSI Rustam Khan No.144/B	CTD, KP
22.	OSI Muhammad Rehman No.66/B	Operation Staff Bannu
23.	OSI Said Azam No.59/B	Investigation Staff Bannu
24.	OSI Gul Janan No.131/B	Operation Staff Lakki Marwat
25.	OSI Hameed Ullah No.46/B	Special Branch, KP
26.	OSI Nizam Khan No.61/B	Operation Staff Lakki Marwat

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27.	OSI Mehrullah No.84/B	Investigation Staff Lakki Marwat
28.	OSI Ghaffar Ali No.78/B	Operation Staff Bannu
29.	OSI Qaza Khan No.5/B	FRP, KP
30.	OSI Abdul Hakim No.151/B	Operation Staff Lakki Marwat

All the committee members are directed to attend the said meeting on due date & time. Besides, the above, the police officers of your respective Districts/Units, either on loan or on deputation to other Districts/Units may also be directed to attend the said meeting on due date and time, please.

Regional Police Officer
Bannu Region,
Bannu
Ph: No.0928-9270076
Fax No.0928-9070075
Email: rpobannu2@gmail.com

VAKALATNAMA

NO. _____ /20

IN THE COURT OF KP Service Tribunal Pedhawa

Dilabag Khan

Appellant
Petitioner
Plaintiff

VERSUS

Police Dept

Respondent (s)
Defendants (s)

I/WE Dilabag Khan

do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____ /20

Dilabag Khan

(CLIENT)

ACCEPTED

SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT