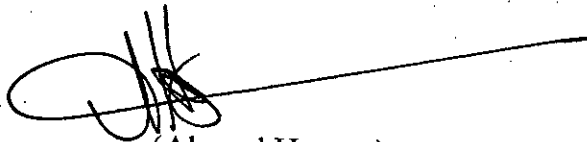


19.08.2019

Learned counsel for the appellant and Mr. Muhammad Bilal, DDA alongwith Mr. Shmraiz Khan, ASI for respondents present. Representative of the respondent-department submitted copy of order dated 30.05.2019 which is placed on file. Learned counsel for the appellant stated that grievance of the appellant has been redressed and requested for withdrawal of the instant appeal.

In view of the above, the present service appeal is hereby dismissed as withdrawn. File be consigned to the record room.

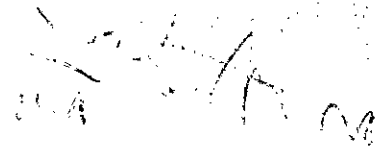


(Ahmad Hassan)
Member



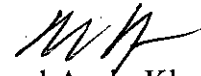
(M. Hamid Mughal)
Member
Camp Court A/Abad

Announced:
19.08.2019



19.03.2019

Counsel for the appellant present. Mr. Muhammad Bilal, Deputy District Attorney alongwith Mr. Shamraiz Khan, ASI for the respondents present. Written reply on behalf of respondents not submitted. Learned Deputy District Attorney requested for further adjournment. Adjourned. To come for written reply/comments on 22.05.2019 before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

22.05.2019

Counsel for the appellant present. Mr. Shamfaiz Khan, ASI alongwith Mr. Muhammad Bilal, Deputy District Attorney for the respondents present and submitted written reply. Adjourned to 19.08.2019 for rejoinder and arguments before D.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

M. Aslam
Aav

ORDER

The undersigned visited District Battagram to hold Police Darbar on 05-03-2019, where SI Muhammad Anwar No.346/H requested for his confirmation in the rank of Sub-Inspector alongwith his colleagues. A Departmental Committee was constituted under the chairmanship of Dr. Zahid Ullah (PSP) District Police Officer, Haripur to unearth the real facts in connection with his deferment including his other colleagues in the DPC held on 23-05-2018.

The committee mentioned in his minutes that both the SIs namely Muhammad Anwar No.346/H & Anas No.116/H were only deferred in the DPC held on 23-05-2018 due to punishment awarded to them by DPO Mansehra & Haripur respectively but their punishments were set aside on 21-06-2018 by then RPO Hazara vide order No. 2791/PA & 2813/PA dated 21-06-2018. A letter vide No. 113/CPB dated 07-05-2018 issued by CPO, according to which old criteria for the confirmation of SIs was extended its validity till 30-06-2018 and on set-a-siding the punishment both of above named SIs were eligible for the confirmation in the rank of SIs alongwith their colleagues, as they were fulfilling the required criteria and police rules.

keeping in view of the recommendation of the committee both the following Sub Inspectors are hereby confirmed from 24-05-2018.

S #	NAME & NO.	ALLOTTED NEW REGION NUMBER	REMARKS
01	SI Muhammad Anwar No.346/H	H/29	His seniority is fixed below the name of SI Naseer Ahmed No. H/15 & above the name of SI Muhammad Ilyas No. H/16
02	SI Anas No.116/H	H/32	His seniority is fixed below the name of SI Nasir Khan No. H/126 & above the name of SI Tahir Iqbal No. H/128

Similarly following 10 SIs have also been recommended for consideration of their cases on sympathetic and compassionate grounds but according to Police rules 13-10 (2) 1934 posting period as SHO is one year and as per criteria laid down by CPO vide letter No. 9750-60/E-II, dated 29-05-2000 & standing order No. 06/2007 posting as OII in investigation is one year, three years each in CTD & PTC Hangu etc. were required for their confirmation but they all are not fulfilling the same, so this office is constrained to confirm them as no criteria or any Police Rules is existing according to which they may be given relaxation for their missing period of posting as SHOs, OII, CTD etc.

<u>S. No.</u>	<u>Name of Sub Inspectors</u>
01	SI Muhammad Razaq No.381/H
02	SI Safdar Zaman No.382/H
03	SI Hajab Khan No.384/H
04	SI Rustam Khan No.385/H
05	SI Muhammad Riaz No.387/H
06	SI Muhammad Munawar No.304/H
07	SI Shoukat No.355/H
08	SI Muhammad Anwar No.358/H
09	SI Anwar Khan No.415/H
10	SI Dost Muhammad No.398/H


Regional Police Officer,
Hazara Region Abbottabad.

No. 13931-34 /E, Dated Abbottabad the 30 /May/2019

Copy of above is forwarded for information & necessary action to District Police Officer, Haripur, Mansehra, Battagram & Lower Kohistan

19.10.2018

Counsel for the appellant Mr. Muhammad Aslam Tanoli,
Advocate present and heard in limine.

Contends that though the appellant was senior having good record but even then he was ignored by the DPC and confirmed his junior colleague.

The points raised need consideration. The appeal is admitted to regular hearing, subject to all legal objections, if raised by the respondents. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 15.01.2019 before S.B at Camp Court Abbottabad.

Appellant Deposited
Security & Process Fee



Chairman
Camp court, A/Abad

15.01.2019

Appellant with counsel present. Written reply not submitted. No one present on behalf of respondent department. Adjourn. To come up for written reply/comments on 19.03.2019 before S.B at camp court Abbottabad. Notice be issued to the respondents for the date fixed.





Member

Camp Court Abbottabad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1056/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/08/2018	<p>The appeal of Mr. Muhammad Anwar presented today by Mr. Muhammad Aslam Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 24/8/18</p>
2-	10-9-18	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>19-10-18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1056/2018

Mohammad Anwar Sub Inspector presently posted as Oll Jalkot Upper Kohistan.

Appellant

VERSUS

1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL

INDEX

S/N	Description of Document	Ann- exure	Page No.
1.	Appeal and application for condonation.		01-12
2.	Order dated 21-04-12 Confirmation as ASI	"A"	13-19
3.	Order dated 21-11-2014 promotion as SI	"B"	20
4.	Order dated 10-10-17 Confirmation of SIs	"C"	21-22
5.	Order dated 24-05-18 Confirmation of SIs.	"D"	23-24
6.	Departmental Appeal	"E"	25-27
7.	Covering letter dated 11-06-2018	"F"	28
8.	Copy of letter No. 160 without date	"G"	29
9.	Copy of application dated 04-08-2018	"H"	30-31
10.	Letter No. 160 dated 11-07-2018	"I"	32
11.	Wakalatnama		

[Signature]
Appellant

Through

[Signature]
M. Aslam
(Mohammad Aslam Tanoli)
Advocate High Court
at Haripur

Dated: *24*-08-2018

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1056/2018

Mohammad Anwar Sub Inspector presently posted as OI
Jalkot Upper Kohistan.

Appellant
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 1331

Dated 24-8-2018

1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL
ACT 1974 AGAINST ORDER DATED 24-05-2018 OF THE REGIONAL
POLICE OFFICER HAZARA REGION ABBOTTABAD WHEREBY
IGNORING THE APPELLANT HIS JUNIORS HAVE BEEN CONFIRMED
AS SUB. INSPECTORS AND ORDER NO. 160 DATED 11-07-2018 OF
THE INSPECTOR GENERAL OF POLICE KPK PESHAWAR VIDE
WHICH APPELLANT'S DEPARTMENTAL HAS BEEN RETURNED
WITHOUT ANY ACTION TO THE REGIONAL POLICE OFFICER,
HAZARA REGION, ABBOTTABAD.

PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL
IMPUGNED ORDER DATED 24-05-2018 OF REGIONAL POLICE
OFFICER HAZARA REGION ABBOTTABAD AS WELL AS ORDER
NO. 160 DATED 11-07-2018 OF PROVINCIAL POLICE OFFICER
KPK PESHAWA MAY GRACIOUSLY BE SET ASID AND APPELLANT
BE CONFIRMED ALONGWITH HIS COLLEAGUES AT RIGHT PLACE
WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Filed 24/8/18
Registrar

Respectfully sheweth,

1. That the appellant was inducted in the Police
Department as constable on 26-04-1993. Ever since his

②

appointment the appellant always performed his assigned duties with zeal, zest, devotion and honesty.

2. That in the year 2003 the appellant was selected for Intermediate Course in the year 2003 which he successfully completed from Police Training College Hingu. The appellant was promoted as Assistant Sub Inspector on 25-03-2008. Subsequently the appellant was confirmed as Astit. Sub Inspector and brought on promotion List "E" with effect from 08-04-2010 vide order No.5279-96/E dated 21-04-2012. The name of appellant stands at Serial No. 85 of the said order. **(Copy of order dated 21-04-2012 is attached as Annex-"A")**.
3. That thereafter the appellant alongwith his Batch Mates was promoted to the rank of Sub. Inspector under Regional Police Officer Hazara Region Abbottabad order No.18506-12/E dated 21-11-2014. The name of appellant stands at Serial No. 13 of the order. **(Copy of the order dated 21-11-2014 is attached as Annex-"B")**.
4. That appellant and his colleagues/batch mates i.e. Abdul Hameed No. 334/H and Waris Khan No. 335/H confirmed as A.S.Is with effect from 08-04-2010 vide Regional Police Officer Hazara Region Abbottabad order dated 21-04-2012 (copy placed as Annex-A) and subsequently promoted as SUB INSPECTOR the

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same day vide order dated 21-11-2014 (copy placed at Annex-B) have been confirmed as Sub Inspector vide order dated 10-10-2017 ignoring the appellant and copy of the said order was not issued to him which the appellant has now obtained on 16-06-2018 through his specific written request. The name of both the colleague's of appellant stands at Serial No. 40 and 41 of the said order. **(Copy of the order dated 10-10-2017 is attached as Annex-"C")**.

5. That in a DPC held on 23-05-2018 wherein the appellant's juniors have been confirmed as Sub Inspectors ignoring the appellant without any reason and justification vide Regional Police Officer Hazara Region Abbottabad order No.15100-120 dated 24-05-2018. **(Copy of the order dated 24-05-2018 is attached as Annex-"D")**.
6. That appellant was promoted as Sub Inspector on 21-11-2014 and he had successfully completed 02 years probation period on 21-11-2016. Not only that the appellant has passed Upper Class Course from Police Training College Hungu in the year 2016. Further, the appellant has already been tested as SI/OII in the department.
7. That during the period since his promotion as Sub Inspector on 21-11-2014 to till date there is nothing adverse against the appellant on record to prevent

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the DPC to deprive the appellant of his legitimate right of confirmation alongwith his colleagues/batch mates. Even the appellant was never reverted from the rank of Sub Inspector during the period of probation. Thus appellant fulfilled all the requirements for confirmation as Sub Inspector but have not been without any reason and rhyme against the law and departmental rules and regulations.

8. That appellant challenged the aforementioned order with regard to non-confirmation alongwith his colleagues/juniors before the worthy Inspector General of Police KPK Peshawar through departmental appeal which appeal was forwarded by the Superintendent of Police (Investigation) Upper Kohistan vide covering letter dated 11-06-2018. **(Copies of departmental appeal and covering letter dated 11-06-2018 are attached as Annex "E & F").**

9. That his above mentioned departmental appeal has been returned by the Inspector General of Police Khyber Pakhtunkhwa to the Regional Police Officer Hazara Region Abbottabad without consideration and giving any decision vide letter No. 168. However when copy of the said letter No. 165 was issued, the appellant found that it did not bear and date on it for the reason best known to the issuing authority. **(Copy of letter No. 168 is attached as Annex-"G")**

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10. That appellant under compulsion filed an application dated 04-08-2018 before the Regional Police Officer Hazara Region Abbottabad for issuing of copy of letter No.160 of the Inspector General of Police KPK Peshawar having its date and also attested copies of other relevant documents for filing appeal before this Honourable Service Tribunal thereupon on 16-08-2018 the appellant was issued the copy of said letter having its date as 11-07-2018. **(Copies of the application dated 04-08-2018 of letter dated 11-07-2018 are attached as "H & I").**
11. That as the appellant fulfilled all the requirements for confirmation as Sub Inspector along with his colleagues (SI Abdul Hameed No. 334/H and SI Waris Khan No. 335/H) whose name stands at Serial No.40 & 41 of the order dated 10-10-2017 issued by the Regional Police Officer Hazara Region Abbottabad.
12. That the appellant has been deprived of legitimate right of confirmation on due and right place along with his colleagues/batch mates by the Regional Police Officer Hazara Region Abbottabad firstly vide order dated 10-10-2017 when his colleagues were confirmed as Sub Inspectors and secondly while confirming appellant's juniors vide order dated 24-05-2018 and thirdly when the Inspector General Police KPK Peshawar has returned appellant's departmental appeal undecided vide letter dated 11-07-2018,

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hence the instant service appeal, inter alia, on the following:-

GROUND:

- a) That both the impugned orders dated 10-10-2017 and 24-05-2018 of the Regional Police Officer Hazara Region Abbottabad as well as order dated 11-07-2018 of the Inspector General of Police KPK Peshawar are void-ab-initio, illegal, unlawful, non-speaking without lawful authority and have been passed perfunctorily, arbitrarily, whimsical, and slipshod in manner, against the facts and circumstances of the case, without any reason and proof, hence are liable to be set aside.
- b) That respondents have not treated the appellant in accordance with law, departmental rules & regulations and policy on the subject and have acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned orders, which are unjust, unfair and hence not sustainable in the eyes of law.
- c) That neither proper scrutiny of the record pertaining to confirmation of appellant was made nor was his record considered by the competent as well as appellate authority while passing impugned orders whereby appellant has been badly affected in service and deprived of his legitimate and lawful right of confirmation

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alongwith his colleagues at right place without any justification, reason and rhyme.

- d) That even the law, departmental rules and regulations have not been followed by the departmental authorities while carrying out the confirmation process. Sub Inspectors who are colleagues/batch mates of the appellant and passing impugned orders ignoring the appellant without any reason and rhyme.
- e) That the appellant authority has also failed to abide by the law and even did not take into consideration the grounds taken in the memo of appeal. Thus the impugned order of the appellate authority contrary to the law as laid down in the KPK Police Rule 1934, other departmental rules regulations read with section 24-A of the General Clause Act 1897 read with Article 10A of the Constitution of Islamic Republic of Pakistan 1973.
- f) That appellant fulfils the criteria and all requirements of confirmation as Sub Inspector and fully deserves to be confirmed from the date of promotion as Sub Inspector alongwith his colleagues at the right place in seniority.

PRAYER:

It is therefore, humbly prayed that on acceptance of instant appeal the impugned orders dated 10-10-2017 & 24-

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05-2018 of the Regional Police Officer, Hazara Region, Abbottabad as well as impugned order dated 11-07-2018 of the Inspector General of Police, KPK, Peshawar may graciously be set aside and the appellant be confirmed as Sub Inspector from the date of his promotion at right place alongwith his colleagues with all consequential all back benefits of service.

Any other relief which this Honour Tribunal deems fit in the circumstance of the case may also graciously be awarded.

APPELLANT

THROUGH

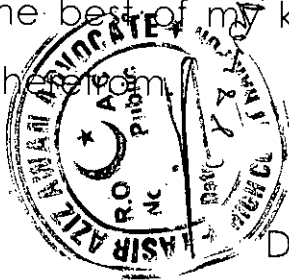
M. Aslam

(MOHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
HARIPUR

Dated: 24-08-2018

AFFIDAVIT

I, Mohammad Anwar appellant do hereby solemnly declare and affirm on oath that the contents of instant appeal are true and correct to the best of my knowledge and nothing has been concealed therefrom.



Deponent/Appellant

Dated: 24-08-2018

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BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Mohammad Anwar Sub Inspector presently posted as Oll
Jalkot Upper Kohistan.

Appellant

VERSUS

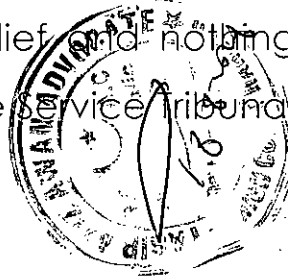
1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad

Respondents

SERVICE APPEAL

AFFIDAVIT:

I, Mohammad Anwar appellant do hereby solemnly
declare and affirm on oath that the contents of the instant
Service Appeal are true and correct to the best of my
knowledge and belief and nothing has been suppressed
from this Honourable Service Tribunal.



Deponent/Appellant

Dated: 24-08-2018

Identified By:

M. Aslam Tanoli
Advocate High Court
At Haripur

Appellant

(10)

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Mohammad Anwar Sub Inspector presently posted as Oll Jalkot Upper Kohistan.

Appellant

VERSUS

1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL

CERTIFICATE

It is certified that no such Appeal on the subject has ever been filed in this or any other court prior to the instant one.


APPELLANT

Dated: 24-08-2018



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Mohammad Anwar Sub Inspector presently posted as Oll Jalkot Upper Kohistan.

Appellant

VERSUS

1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL

**APPLICATION FOR CONDONATION OF DELAY IN FILING THE
APPEAL BEFORE THIS HONOUR SERVICE TRIBUNAL.**

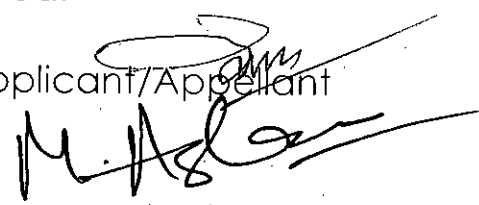
Respectfully Sheweth:

1. That the Applicant/Appellant has today filed the Service Appeal, which may be considered as part and parcel of this application, against the order dated 10-10-2017, 24-05-2018 and 11-07-2018 whereby appellant have been deprived of his legitimate right of confirmation as Sub Inspector alongwith his colleagues and his departmental appeal has been turned down by the appellate authority illegally, unlawfully against the departmental rules and regulations and against the facts of the matter.
2. That as the appellant has been deprived of his legal, lawful and factual right of confirmation as Sub Inspector alongwith his colleagues at a right place therefore the orders passed by the departmental authorities are ab-initio illegal, null & void, without jurisdiction, lawful authority, in sheer violation of mandatory statutory provisions of law thus being void ab-initio is ineffective against the rights of Applicant/Appellant.

- 3. That Applicant/appellant for the review of the aforesaid illegal order submitted a departmental appeal to the Appellate Authority/Respondent-1 but the same has not taken into consideration and returned without decided back leaving the appellant's grievance as unsettled which causes a recurring loss in future with an ultimate loss in pension as well.
- 4. That as the orders of departmental authorities are void, being passed in sheer violation and derogation of the statutory provisions governing the terms and condition of service of the appellant, therefore the same are a nullity in the eyes of law and being a void and unlawful orders, causing a recurring cause of action to the Applicant/Appellant can be challenged and questioned irrespective of a time frame.
- 5. That the instant application is being filed as an abundant caution for the condonation of delay, if any.
- 6. That the impugned orders are illegal, void ab-initio, a nullity in the eyes of law thus liable to be set aside in the interest of justice.

It is therefore respectfully prayed that on acceptance of the instant application the delay, if any, in the filing of the above titled appeal may graciously be condoned.

Through:

Applicant/Appellant

 (Mohammad Aslam Tanoli)
 Advocate High Court
 At District Bar Haripur

Dated: 24-08-2018

AFFIDAVIT:

It is solemnly declare and affirm on oath that the contents of the instant application/appeal are true and correct to the best of my knowledge and belief.

Dated: 24-08-2018



Applicant/Appellant


ORDER**(13)****Annex-A**

As approved by the departmental promotion committee held on 21-04-2012 in the office of the undersigned the following officiating Assistant Sub Inspectors of this Region are hereby confirmed in the rank of ASIs and their names brought on promotion list "E" with effect from the dates as noted against their names:-

They are allotted Region numbers as noted against each their names:-

S.NO.	NAME & NO.	PRESENT POSTING	REGION NUMBER	DATE OF CONFIRMATION AND NAME BROUGHT ON PROMOTION LIST "E"
01	ASI Muhammad Saeed No.267	Operational Wing Mansehra	3/H	14-02-2008
02	ASI Muhammad Saeed No.20	Investigation Wing Haripur	5/H	14-02-2008
03	ASI Umer Zada No.283	Operational Wing Battagram	6/H	14-02-2008
04	ASI Muhammad Resaan 265	PTC Hangu	16/H	14-02-2008
05	ASI Khushal No.288	Operational Wing Mansehra	18/H	19-12-2008
06	ASI Riasat Khan No.44	Investigation Wing Haripur	20/H	19-12-2008
07	ASI Muhammad Yousaf 778	Operational Wing Abbottabad	21/H	08-08-2009
08	ASI Ahmed Khan No.258	Investigation Wing Haripur	23/H	08-08-2009
09	ASI Abdul Rehman No.307	Operational Wing Haripur	24/H	08-08-2009
10	ASI Ali Asghar No.240	Investigation Wing Mansehra	30/H	08-08-2009
11	ASI Javed Iqbal No.208	Special Branch	31/H	08-08-2009
12	ASI Muhammad Farooq No.671	Investigation Wing Mansehra	46/H	08-08-2009
13	ASI Riasat Khan No.376	Investigation Wing Kohistan	47/H	08-08-2009
14	ASI Muhammad Asif No.26	ACE Mansehra	59/H	08-08-2009
15	ASI Muhammad Yasin No.604	Operational Wing Kohistan	60/H	08-08-2009
16	ASI Muhammad Banaras No.10	Investigation Wing Abbottabad	63/H	08-08-2009
17	ASI Abdul Rauf No.584	Investigation Wing Abbottabad	65/H	08-08-2009
18	ASI Muhammad Sajjad 148/518	Operational Wing Haripur	67/H	08-08-2009
19	ASI Habib-ur-Rehman No.378	Operational Wing Haripur	80/H	23-10-2009
20	SI Azhar Khan No.1853 (Accelerated promoted)	Operational Wing Kohistan	97/H	23-10-2009
21	ASI Muhammad Jameel 290	Operational Wing Haripur	105/H	23-10-2009
22	ASI Muhammad Sarwar 289	Operational Wing Haripur	110/H	23-10-2009
23	ASI Muhammad Imran No.355	Investigation Wing Haripur	120/H	23-10-2009

A/Deputy
A.D.I. Police
Hazara Region
Abbottabad

16/8/18

24	ASI Sadiq Hussain Shah 243	Operational Wing Battagram	123/H	23-10-2009
25	ASI Khan Asghar No.497	Investigation Wing Mansehra	145/H	23-10-2009
26	ASI Shabir Ahmed No.408	Investigation Wing Mansehra	149/H	23-10-2009
27	ASI Muhammad Khushal 253	Operational Wing Mansehra	191/H	23-10-2009
28	ASI Tariq Mehmood No.983/1	Operational Wing Abbottabad	200/H	08.04.2010
29	ASI Muhammad Riaz No.603	Operational Wing Abbottabad	201/H	08.04.2010
30	ASI Phul Hussain No.68	Operational Wing Haripur	202/H	08-04-2010
31	ASI Muhammad Idrees No.11	Operational Wing Abbottabad	214/H	08-04-2010
32	ASI Waris Khan No.19	Operational Wing Kohistan	248/H	08-04-2010
33	ASI Abdul Rashid No.292	Operational Wing Abbottabad	257/H	08-04-2010
34	ASI Aurangzeb No.342	Operational Wing Abbottabad	258/H	08-04-2010
35	ASI Zafar Hussain No.188	Operational Wing Battagram	259/H	08-04-2010
36	ASI Muhammad Anwar No.39	Investigation Wing Haripur	261/H	08-04-2010
37	ASI Abdul Jabbar No.310	Investigation Wing Haripur	297/H	08-04-2010
38	ASI Munir Hussain No.178	Investigation Wing Abbottabad	298/H	08-04-2010
39	ASI Payamber Raza No.353	ACE Haripur	299/H	08-04-2010
40	ASI Qazi Sultan No.127	Operational Wing Haripur	300/H	08-04-2010
41	ASI Tasleem Shah No.1076	Torghar District	301/H	08-04-2010
42	ASI Muhammad Bashir No.582	Operational Wing Battagram.	302/H	08-04-2010
43	ASI Ali Farman No.844	Operational Wing Abbottabad	303/H	08-04-2010
44	ASI Munawar Khan No.296	Operational Wing Abbottabad	304/H	08-04-2010
45	ASI Gul Nawaz No.198	Investigation Wing Haripur	305/H	08-04-2010
46	SI Muhammad Javed No.595 (Accelerated promoted)	Operational Wing Kohistan	306/H	08-04-2010
47	ASI Khan Baz No..657	Investigation Wing Abbottabad	308/H	08-04-2010
48	ASI Abdul Rashid No.125/405	Operational Wing Mansehra	309/H	08-04-2010
49	ASI Muhammad Shafique 303	Operational Wing Haripur	310/H	08-04-2010
50	ASI Ishtiaq Hussain Shah 870	Operational Wing Abbottabad	311/H	08-04-2010
51	ASI Riasat Khan No.102	Operational Wing Haripur	312/H	08-04-2010
52	ASI Muhammad Farid No.68	Operational Wing Mansehra	313/H	08-04-2010
53	ASI Sherdad Khan No.116	Torghar District	314/H	08-04-2010
54	ASI Muhammad Fardos No.214	Investigation Wing Abbottabad	315/H	08-04-2010

Attested
[Signature]

55	ASI Abdul Wajid No.153	Torghar District	316/H	08-04-2010
56	ASI Abdul Rashid No.1002	Operational Wing Abbottabad	317/H	08-04-2010
57	ASI Murad Ali No.554	Special Branch	318/H	08-04-2010
58	ASI Muhammad Javed No.27	ACE Mansehra	319/H	08-04-2010
59	ASI Muhammad Nazir No.7	Operational Wing Abbottabad	320/H	08-04-2010
60	ASI Naik Muhammad No.353	Investigation Wing Mansehra	321/H	08-04-2010
61	ASI Anwar-ul-Haq No.245	Investigation Wing Haripur	322/H	08-04-2010
62	ASI Muhammad Hayat No.166	Investigation Wing Battagram	323/H	08-04-2010
63	ASI Noor Nabi Shah No.586	Operational Wing Kohistan	324/H	08-04-2010
64	ASI Muhammad Aslam No.916	Investigation Wing Abbottabad	325/H	08-04-2010
65	ASI Muhammad Aksar No.28	Investigation Wing Mansehra	326/H	08-04-2010
66	ASI Javeed-ur-Rehman 176	Investigation Wing Haripur	327/H	08-04-2010
67	ASI Muhammad Aslam No.592	Operational Wing Battagram	328/H	08-04-2010
68	ASI Muhammad Munir No.29	Investigation Wing Mansehra	329/H	08-04-2010
69	ASI Akhtar Nawaz No.197	Operational Wing Mansehra	330/H	08-04-2010
70	ASI Abdul Khaliq No.357	Investigation Wing Abbottabad	331/H	08-04-2010
71	ASI Tasweer Hussain No.587	Operational Wing Mansehra	332/H	08-04-2010
72	ASI Khan Bahadar No.759	Operational Wing Abbottabad	333/H	08-04-2010
73	ASI Abdul Hameed No.566	Investigation Wing Mansehra	334/H	08-04-2010
74	ASI Waris Khan No.156	Investigation Wing Mansehra	335/H	08-04-2010
75	ASI Sakhi Sultan No.463	Special Branch	336/H	08-04-2010
76	ASI Khan Waiz No.353/335	Investigation Wing Abbottabad	337/H	08-04-2010
77	ASI Kamran Habib No.370	RTW Mansehra	338/H	08-04-2010
78	ASI Hafiz-ur-Rehman No.83	Operational Wing Kohistan	339/H	08-04-2010
79	ASI Bashrat Shah No.421	Investigation Wing Kohistan	340/H	08-04-2010
80	ASI Habib-ur-Rehman No.242	Investigation Wing Haripur	341/H	08-04-2010
81	ASI Naseer Ahmed No.338	Operational Wing Abbottabad	342/H	08-04-2010
82	ASI Jehanzeb No.719	Operational Wing Kohistan	343/H	08-04-2010
83	ASI Pervez No.95	Operational Wing Abbottabad	344/H	08-04-2010
84	ASI Niaz Muhammad No.358	Investigation Wing Mansehra	345/H	08-04-2010
85	ASI Muhammad Anwar No.536/34	Investigation Wing Mansehra	346/H	08-04-2010
86	ASI Muhammad Ghyoor No.420	Investigation Wing Haripur	348/H	20-10-2010
87	ASI Muhammad Siraj No.305	Operational Wing Battagram	349/H	20-10-2010

Attested



88	ASI Muhammad Ilyas No.271	Operational Wing Kohistan	350/H	20-10-2010
89	ASI Muhammad Noshad No.559	Investigation Wing Haripur	351/H	20-10-2010
90	ASI Mehboob-ur-Rehman 39	Torghar District	352/H	20-10-2010
91	ASI Abdul Sattar No.583	Operational Wing Mansehra	353/H	20-10-2010
92	ASI Waris Khan No.140	ACE Battagram	354/H	20-10-2010
93	ASI Shoukat Hussain No.527	Operational Wing Mansehra	355/H	20-10-2010
94	ASI Sher Dil No.418	Operational Wing Abbottabad	356/H	20-10-2010
95	ASI Aurangzeb No.85	Operational Wing Abbottabad	357/H	20-10-2010
96	ASI Muhammad Anwar No.151	Operational Wing Mansehra	358/H	20-10-2010
97	ASI Ali Khan No.422	Operational Wing Haripur	359/H	20-10-2010
98	ASI Muhammad Zaman No.423	Operational Wing Haripur	360/H	20-10-2010
99	ASI Muhammad Saleem No.944	Special Branch Peshawar	361/H	20-10-2010
100	ASI Shakeel Ahmed No.168	Operational Wing Kohistan	362/H	20-10-2010
101	ASI Qazi Iftikhar No.395	Operational Wing Haripur MA	363/H	20-10-2010
102	ASI Sokhraj Ahmed No.94	Operational Wing Mansehra	364/H	20-10-2010
103	ASI Muhammad Pervez No.212	Motorway Islamabad	365/H	20-10-2010
104	ASI Sanawar Shah No. 7	Operational Wing Battagram	366/H	20-10-2010
105	ASI Muhammad Raziq No.435	Operational Wing Haripur	367/H	20-10-2010
106	ASI Gul Samar No.507	Operational Wing Mansehra	368/H	20-10-2010
107	ASI Muhammad Nazir No.968/255	Operational Wing Abbottabad	369/H	20-10-2010
108	ASI Abdul Hameed No.546	Investigation Wing Kohistan	370/H	20-10-2010
109	ASI Muhammad Rafique No.795	Operational Wing Abbottabad	371/H	20-10-2010
110	ASI Zakir Hussain Shah No.224	Investigation Wing Abbottabad	372/H	20-10-2010
111	ASI Muhammad Aslam No.79	Investigation Wing Battagram	373/H	20-10-2010
112	ASI Wajid Ali No.272	Investigation Wing Mansehra	374/H	20-10-2010
113	ASI Abdul Jalil No.266	Operational Wing Haripur	375/H	20-10-2010
114	ASI Amjad Ali No.76	Operational Wing Battagram	376/H	20-10-2010
115	ASI Dil Pazir No.134	Operational Wing Abbottabad	377/H	20-10-2010
116	ASI Muhammad Pervez No.22	Operational Wing Abbottabad	378/H	20-10-2010
117	ASI Arshad Khan No.427	Investigation Wing Haripur	379/H	20-10-2010
118	ASI Muhammad Bilal No.617	Torghar District	380/H	20-10-2010
119	ASI Muhammad Razaq 438	Operational Wing Kohistan	381/H	20-10-2010

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120	ASI Safdar Zaman No.104	Investigation Wing Haripur	382/H	20-10-2010
121	ASI Muhammad Nawaz No.187	Investigation Wing Kohistan	383/H	20-10-2010
122	ASI Hajab Khan No.335	Torghar District	384/H	20-10-2010
123	ASI Rustam Khan No.335	Investigation Wing Mansehra	385/H	29-08-2011
124	ASI Muhammad Ashraf No.425	Investigation Wing Haripur	386/H	29-08-2011
125	ASI Muhammad Riaz No.545	Operational Wing Haripur	387/H	29-08-2011
126	ASI Zahir Khan No. 599	Operational Wing Kohistan	388/H	29-08-2011
127	ASI Ali Asghar No.345	Investigation Wing Kohistan	389/H	29-08-2011
128	ASI Muhammad Nawaz No.615	Operational Wing Abbottabad	390/H	29-08-2011
129	ASI Syed Imtiaz Ali Shah No.35	ACE Abbottabad	391/H	29-08-2011
130	ASI Muhammad Sajid No. 47	Operational Wing Battagram	392/H	29-08-2011
131	ASI Fayaz Ahmed No. 529	Operational Wing Mansehra	393/H	29-08-2011
132	SI Chanzeb No.475/21 (Accelerated promoted)	Operational Wing Haripur	394/H	29-08-2011
133	ASI Mir Afzal No. 613	Operational Wing Haripur	395/H	29-08-2011
134	ASI Faqir Muhammad No. 137	RTW Mansehra	396/H	29-08-2011
135	ASI Muhammad Tariq No.471	Operational Wing Mansehra	397/H	29-08-2011
136	ASI Dost Muhammad No.320	Investigation Wing Mansehra	398/H	29-08-2011
137	ASI Khurshid Ahmed No. 430	Operational Wing Haripur	399/H	29-08-2011
138	ASI Muhammad Mushtaq 750	Investigation Wing Abbottabad	400/H	29-08-2011
139	ASI Fazal Rabbi No. 555/122	Operational Wing Abbottabad	401/H	29-08-2011
140	ASI Muhammad Arif No. 502	Investigation Wing Abbottabad	402/H	29-08-2011
141	ASI Muhammad Younas 217/33	Investigation Wing Abbottabad	403/H	29-08-2011
142	ASI Zardad Khan No. 429	Operational Wing Haripur	404/H	29-08-2011
143	ASI Rustam No. 112	Operational Wing Kohistan	405/H	29-08-2011
144	ASI Ghulam Abbas No. 372	Operational Wing Kohistan	406/H	13-10-2011
145	ASI Muhammad Anwar No 427	Investigation Wing Mansehra	407/H	13-10-2011
146	ASI Akhtar Hussain No.433	Operational Wing Kohistan	408/H	13-10-2011
147	ASI Saeed-ur-Rehman No. 432	Operational Wing Kohistan	409/H	13-10-2011
148	ASI Muhammad Farooq No.320	Investigation Wing Abbottabad	410/H	13-10-2011
149	ASI Abdul Rehan No. 67	Operational Wing Battagram	411/H	13-10-2011
150	ASI Gul Shahzad No. 48	Operational Wing Battagram	412/H	13-10-2011
151	ASI Shahib Zada No. 568	ACE Kohistan	413/H	13-10-2011

Attested

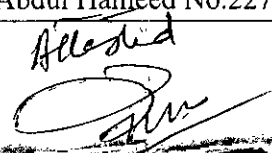
[Signature]

17/07/18

152	ASI Muhammad Amin No. 976	RTW Mansehra	414/H	13-10-2011
153	ASI Anwar Khan No. 467/10	Investigation Wing Abbottabad	415/H	13-10-2011
154	ASI Johardad Shah No. 93	Operational Wing Kohistan	416/H	13-10-2011
155	ASI Afsar Khan No. 93	Torghar District	417/H	13-10-2011
156	ASI Muhammad Aslam No.406	DCT Special Branch	418/H	13-10-2011
157	ASI Mukhtaj Ali No. 222	Investigation Wing Haripur	419/H	13-10-2011
158	ASI Shafiq-ur-Rehman No. 69	Operational Wing Haripur	420/H	13-10-2011
159	ASI Muhammad Nawaz No.400	Investigation Wing Mansehra	421/H	13-10-2011

2 The DPC has also considered the confirmation of 57 ASIs who were confirmed in a DPC held on 19-03-2009, their dates of confirmation also has been regularized and they are confirmed with effect from dates of their completion of 2 years officiating period as noted against their names:-

S.No	Name & No	Present posting	Date of confirmation & name brought on promotion list "E"
1	Muhammad Haroon No.52/H	Haripur District	02-08-2006
2	Shad Muhammad No.58/H	Haripur District	25-01-2007
3	Khawaj Muhammad No.71/H	Haripur District	25-01-2007
4	Manzoor ur Rehman No.111/H	Mansehra District	25-01-2007
5	Muhammad Nazir No.129/H	Abbottabad District	25-01-2007
6	Abdur Rashid No.134/H	Mansehra District	25-01-2007
7	Muhammad Aslam No.136/H	Abbottabad District	25-01-2007
8	Raja Bukhtiar No.138/H	Mansehra District	25-01-2007
9	Niaz Muhammad No.148/H	Abbottabad District	25-01-2007
10	Fazal Wahab No.150/H	Special Branch	25-01-2007
11	Khursheed Anwar No.162/H	Special Branch	25-01-2007
12	Jehanzeb Khan No.169/H	Mansehra District	25-01-2007
13	Muhammad Amin No.170/H	Abbottabad District	25-01-2007
14	Muhammad Ajab No.177/H	Abbottabad District	25-01-2007
15	Muhammad Ayub No.179/H	Abbottabad District	25-01-2007
16	Saeed Akhtar No.190/H	Haripur District	25-01-2007
17	Muhammad Musadaq No.210/H	Battagram District	25-01-2007
18	Muhammad Javed No.216/H	Torghar District	25-01-2007
19	Abdul Khanan No.217/H	Mansehra District	25-01-2007
20	Ali Akbar No.218/H	Mansehra District	25-01-2007
21	Muhammad Nazir No.219/H	Battagram District	25-01-2007
22	Abdur Rasheed No.220/H	Abbottabad District	25-01-2007
23	Umar Rehman No.221/H	Motorway Islamabad	25-01-2007
24	Sarwar Khan No.222/H	Abbottabad District	25-01-2007
25	Ehsan Shah No.223/H	Haripur District	25-01-2007
26	Muhammad Safdar No.224/H	Haripur District	25-01-2007
27	Muhammad Safdar No.225/H	Haripur District	25-01-2007
28	Gulzar No.226/H	Abbottabad District	25-01-2007
29	Abdul Hameed No.227/H	Abbottabad District	25-01-2007

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30	Taj Nawab No.228/H	Torghar District	25-01-2007
31	Muhammad Sajjad No.229/H	Mansehra District	25-01-2007
32	Fida Muhammad No.230/H	Abbottabad District	25-01-2007
33	Zumarad Khan No.231/H	Abbottabad District	25-01-2007
34	Muhammad Saleem No.232/H	Mansehra District	25-01-2007
35	Muhammad Ishaq No.233/H	Haripur District	25-01-2007
36	Baroz Khan.No.234/H	RTW Kohat	25-01-2007
37	Muhammad Nazir No.235/H	Abbottabad District	25-01-2007
38	Muhammad Shaheen No.236/H	Abbottabad District	25-01-2007
39	Muhammad Nazik No.237/H	Haripur District	25-01-2007
40	Gohar Rehman No.238/H	Abbottabad District	25-01-2007
41	Shamus ul Qamar No.239/H	Motorway Police	25-01-2007
42	Murtaza Ahmed No.240/H	Abbottabad District	25-01-2007
43	Nissar Ahmed No.241/H	Battagram District	25-01-2007
44	Gul Muhammad No.242/H	Mansehra District	25-01-2007
45	Abdul Hafeez No.243/H	Abbottabad District	25-01-2007
46	Muhammad Tanveer No.244/H	Kohistan District	25-01-2007
47	Ghulam Murtaza No.245/H	Battagram District	14-02-2008
48	Daraz Khan No.246/H	Special Branch	14-02-2008
49	Muhammad Aftab No.247/H	Mansehra District	14-02-2008
50	Zain Khan No.249/H	Abbottabad District	14-02-2008
51	Muhammad Safeer No.250/H	Abbottabad District	14-02-2008
52	Habib ur Rehman No.251/H	Mansehra District	14-02-2008
53	Imtiaz Ahmed No.252/H	Mansehra District	14-02-2008
54	Saleem Rasheed No.253/H	Abbottabad District	14-02-2008
55	Abdul Qayyum No.254/H	Abbottabad District	14-02-2008
56	Sarwaiz Khan No.255/H	Mansehra District	14-02-2008

Deputy Inspector General of Police,
Hazara (Abbottabad)
(AEC Dilawar)

No. 5279-96 E, dated Abbottabad the 21/04 2012.

Copy of above is forwarded for information and necessary action to the:-

1. Deputy Inspector General of Police National Highway and Motorway Police N-5 Rawalpindi.
2. Director Anti Corruption Establishment Khyber Pakhtunkhwa, Peshawar.
3. AIG Special Branch Khyber Pakhtunkhwa, Peshawar.
4. Commandant Police Training College Hangu.
5. All District Police Officer, in Hazara Region.
6. All Senior Superintendent of Police, Investigation in Hazara Region.
7. SP Traffic Peshawar.
8. Principle RTW Mansehra.
9. OS/AS Region Office Abbottabad.

Accepted
[Signature]

Consequent upon the recommendation of promotion board

Region Office Abbottabad on 06-11-2014, the following ASIs on list "E" were found suitable for promotion as such they are hereby promoted to the rank of officiating Sub-Inspectors.

Their promotion shall take effect from the date of taking over the charge of higher responsibility:-

S #	NAME AND NO.	PRESENT POSTING
01	ASI Abdul Hameed No.334/H	Investigation Wing Mansehra
02	ASI Waris Khan No.335/H	Investigation Wing Mansehra
03	ASI Sakhi Sultan No.336/H	Special Branch Peshawar
04	ASI Khan Waiz No.337/H	Investigation Wing Abbottabad
05	ASI Kamran Habib No.338/H	RTW Mansehra
06	ASI Hafiz-ur-Rehman No.339/H	Operational Wing Mansehra
07	ASI Bashrat Shah No.340/H	Operational Wing Haripur
08	ASI Habib-ur-Rehman No.341/H	Investigation Wing Haripur
09	ASI Naseer Ahmed No.342/H	Operational Wing Abbottabad
10	ASI Jehanzeb No.343/H	CTD Peshawar
11	ASI Pervez No.344/H	Operational Wing Abbottabad
12	ASI Niaz Muhammad No. 345/H	Investigation Wing Mansehra
13	ASI Muhammad Anwar No.346/H	Operational Wing Mansehra
14	ASI Naccm Akhtar No.288/H	Operational Wing Abbottabad
15	ASI Arshad Ali No.347/H	Operational Wing Mansehra
16	ASI Muhammad Siraj No.349/H	Operational Wing Battagram
17	ASI Muhammad Ilyas No.350/H	Investigation Wing Mansehra

[Signature]
Regional Police Officer,
Hazara Region Abbottabad
(AEC Dilawar)

No. 18506-12 E, dated Abbottabad the 21/11 /2014.

Copy of above is forwarded for information and necessary action to

the:-

1. Addl: Inspector General of Police Special Branch Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police CTD Khyber Pakhtunkhwa Peshawar.
3. District Police Officers, Haripur, Abbottabad, Mansehra & Battagram.
4. Superintendents of Police Investigation Haripur, Abbottabad & Mansehra.
5. Superintendent of Police CTD Hazara Abbottabad.
6. Principal RTW Mansehra.
7. OS / AS Region Office Abbottabad.

[Signature]
A/D.J.C. Police
Hazara Region
Abbottabad

16.8.18

(21)

ORDER

As approved by the 'Departmental Promotion Committee' held on 09/10/2017 in the office of the undersigned the following officiating Sub Inspectors who have completed their two years officiating / probation period and fulfilled the laid down criteria for substantive rank under Police Rules, 13-1, 13-10 (2) and 13-18 are hereby confirmed as Sub Inspectors with immediate effect.

They are allotted new Region numbers as noted against each their names

S #	NAME AND NO.	PRESENT POSTING	ALLOTTED NEW REGION NUMBER
01	SI Muhammad Nazir No.76/H	Special Branch Peshawar	H/162
02	SI Muhammad Sarvar No.222/H	Abbottabad District	H/163
03	SI Muhammad Saleem No.232/H	Elite Force Hazara	H/164
04	SI Ghulam Murtaza No.245/H	Elite Force Hazara	H/165
05	SI Zameer Khan No.249/H	CTD Khyber Pakhtunkhwa	H/166
06	SI Muhammad Saeed No.3/H	Elite Force Hazara	H/167
07	SI Tanveer Ahmed No.122/H	CTD Khyber Pakhtunkhwa	H/168
08	SI Muhammad Yasin No.60/H	Special Branch Peshawar	H/169
09	SI Muhammad Sajjad No.67/H	Torghar District	H/170
10	SI Muhammad Khushal No.191/H	Mansehra District	H/171
11	SI Tariq Mahmood No.200/H	Abbottabad District	H/172
12	SI Muhammad Shakeel No.266/H	Elite Force Hazara	H/173
13	SI Muhammad Ali Khan No.268/H	Haripur District	H/174
14	SI Raja Mumtaz Ahmed No.270/H	CTD Khyber Pakhtunkhwa	H/175
15	SI Waqar Ali No.29/H	Elite Force Hazara	H/176
16	SI Paul Hussain No.202/H	Haripur District	H/177
17	SI Anwar Farman No.303/H	Abbottabad District	H/178
18	SI Ghani Nawaz No.305/H	CTD Khyber Pakhtunkhwa	H/179
19	SI Khan Baz No.308/H	Upper Kohistan District	H/180
20	SI Abdul Rashid No.309/H	CTD Khyber Pakhtunkhwa	H/181
21	SI Muhammad Shafique No.310/H	Torghar District	H/182
22	SI Sherdad Khan No.314/H	Upper Kohistan District	H/183
23	SI Waqar Ali No.284/H	Mansehra District	H/184
24	SI Muhammad Fardos No.315/H	Abbottabad District	H/185
25	SI Abdul Wajid No.316/H	CTD Khyber Pakhtunkhwa	H/186
26	SI Nurad Ali No.318/H	Special Branch Peshawar	H/187
27	SI Muhammad Javed No.319/H	Battagram District	H/188
28	SI Muhammad Nazir No.320/H	Battagram District	H/189
29	SI Haik Muhammad No.321/H	PTC Hangu	H/190
30	SI Anwar-ul-Haq No.322/H	CTD Khyber Pakhtunkhwa	H/191
31	SI Muhammad Hayaat No.323/H	Battagram District	H/192
32	SI Noor Nabi Shah No.324/H	Upper Kohistan District	H/193
33	SI Muhammad Aslam No.325/H	PTC Hangu	H/194
34	SI Muhammad Aksar No.326/H	CTD Khyber Pakhtunkhwa	H/195
35	SI Javeed-ur-Rehman No.327/H	Special Branch Peshawar	H/196
36	SI Muhammad Aslam No.328/H	CTD Khyber Pakhtunkhwa	H/197
37	SI Akhtar Nawaz No.330/H	Mansehra District	H/198
38	SI Abdul Khalig No.331/H	Mansehra District	H/199
39	SI Tasveer Hussain Shah No.332/H	Mansehra District	H/200
40	SI Abdul Hamid No.334/H	Mansehra District	H/201
41	SI Waqar Khan No.335/H	Traffic Police KPK	H/202

Attested

A/D.I. G. Police
Hazara Region
Abbottabad

16/8/018

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Phone No. 0992-9110621
Fax No. 0992-9110023

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42	SI Khan Waiz No. 337/H	Mansehra District	H/203
43	SI Habib-ur-Rehman No. 341/H	Torghar District	H/204
44	SI Pervez No. 344/H	Abbottabad District	H/205
45	SI Maz Muhammad No. 345/H	Mansehra District	H/206
46	SI Naeem Akhtar No. 288/H	PTS Mansehra	H/207
47	SI Muhammad Siraj No. 349/H	Lower Kohistan District	H/208
48	SI Abdul Sattar No. 353/H	Elite Force Hazara	H/209
49	SI Waseem Khan No. 354/H	ACE Khyber Pakhtunkhwa	H/210
50	SI Jaber Durrani No. 356/H	Elite Force Hazara	H/211
51	SI Abdul Maroof No. H/27	ACE Khyber Pakhtunkhwa	H/212
52	SI Asad Ullah No. 329/H	Mansehra District	H/213
53	SI Muhammad Munir No. 329/H	Mansehra District	H/214
54	SI Abdul Hameed No. 370/H	Torghar District	H/215
55	SI Muhammad Rafique No. 371/H	Abbottabad District	H/216
56	SI Waqar Ali No. 374/H	Mansehra District	H/217
57	SI Abdul Jali No. 375/H	Upper Kohistan District	H/218
58	SI Amjad Ali No. 376/H	Battagram District	H/219
59	SI Muhammad Nawaz No. 333/H	Mansehra District	H/220
60	SI Muhammad Khan No. 127/H	Abbottabad District	H/221

[Signature]
Regional Police Officer,
Hazara Region Abbottabad
IAEC Dilarwari

No. 12-63 dated Abbottabad the 10-10 2017

Copy of above is forwarded for information and necessary action to the:-

1. Director, Anti-Corruption Establishment Khyber-Pakhtunkhwa Peshawar.
2. Additional Inspector General of Police, Elite Force Khyber Pakhtunkhwa Peshawar.
3. Additional Inspector General of Police, Special Branch Khyber Pakhtunkhwa Peshawar.
4. Deputy Inspector General of Police, CTD Khyber Pakhtunkhwa Peshawar.
5. Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa Peshawar.
6. Commandant, Police Training College Hangu.
7. All District Police Officers in Hazara Region.
8. All Superintendents of Police Investigation in Hazara Region.
9. Superintendent of Police Elite Force Hazara Abbottabad.
10. Superintendent of Police CTD Hazara Abbottabad.
11. Principal, Police Training School Mansehra.
12. OS/AS Region Office Abbottabad.

(Necessary Gazette Notification may be issued accordingly)

Attested
[Signature]

ORDER

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Annex-D

As approved by the Departmental Promotion Committee held on 23-05-2018 in the office of the undersigned the following officiating Sub Inspectors who have completed their two years officiating / probation period and fulfilled the laid down criteria for substantive rank under Police Rules. 13-1, 13-10 (2) and 13-18 are hereby confirmed as Sub Inspectors with immediate effect.

They are allotted new Region numbers as noted against each their names:-

S #	NAME AND NO.	PRESENT POSTING	ALLOTTED NEW REGION NUMBER
01	SI Abdul Qayyum No.254/H	Karakoram Patrol Force Kohistan	H/03
02	SI Azhar Khan No.97/H	CTD Khyber Pakhtunkhwa	H/04
03	SI Mian Liaqat Ali Khan No.271/H	Elite Force Khyber Pakhtunkhwa	H/08
04	SI Asif Hussain No.287/H	Kolai Pallas Kohistan District	H/09
05	SI Tasleem Shah No.301/H	Torghar District	H/10
06	SI Khan Bahadar No.333/H	Abbottabad District	H/12
07	SI Sakhi Sultan No.336/H	Special Branch Khyber Pakhtunkhwa	H/13
08	SI Hafeez-ur-Rehman No.339/H	Mansehra District	H/14
09	SI Naseer Ahmed No.342/H	Mansehra District	H/15
10	SI Muhammad Ilyas No.350/H	Battagram District	H/16
11	SI Mehboob-ur-Rehman No.352/H	Abbottabad District	H/17
12	SI Sokhraj No.364/H	CTD Khyber Pakhtunkhwa	H/18
13	SI Muhammad Raziq No.367/H	Upper Kohistan District	H/19
14	SI Gul Samar No.368/H	Upper Kohistan District	H/22
15	SI Zakir Hussain Shah No.372/H	PTC Hangu	H/23
16	SI Dil Pazir No.377/H	Mansehra District	H/24
17	SI Arshad Khan No.379/H	Upper Kohistan District	H/25
18	SI Faisal Hafeez No.159/H	Haripur District	H/27
19	SI Noman Javed No.121/H	Haripur District	H/142
20	SI Sardar Tahir Saleem No.131/H	Elite Force Khyber Pakhtunkhwa	H/28
21	SI Aamir Hussain No.37/H	Mansehra District	H/43
22	SI Khizar Khan Jadoon No.158/H	Abbottabad District	H/76
23	SI Wajid Hussain No.141/H	Abbottabad District	H/86
24	SI Shehryar No.289/H	Abbottabad District	H/94
25	SI Shahzad Khan No.142/H	Abbottabad District	H/110
26	SI Mehtab Nazir No.144/H	Elite Force Khyber Pakhtunkhwa	H/113
27	SI Muhammad Saddique No.161/H	Haripur District	H/114
28	SI Syed Asim Imam Bukhari No.57/H	Upper Kohistan District	H/115
29	SI Yasir No.60/H	Mansehra District	H/118
30	SI Assad No.62/H	Haripur District	H/119
31	SI Syed Imtiaz Ali Shah No.292/H	Battagram District	H/121
32	SI Muhammad Imtiaz Khan No.293/H	Lower Kohistan District	H/122
33	SI Amir Ashfaq No.72/H	Mansehra District	H/124
34	SI Hadi Paristan No.86/H	Haripur District	H/125

Attested
[Signature]
A/D.I. of Police
Mansehra Region
466148601
16/8/2018

24

35	SI Nasir Khan No.94/H	Kolai Pallas Kohistan District	H/126
36	SI Tahir Iqbal No.118/H	Mansehra District	H/128
37	SI Muhammad Haque Hashmi No.294/H	Upper Kohistan District	H/131
38	SI Khalil-ur-Rehman No.295/H	Lower Kohistan District	H/132
39	SI Muhammad Nawaz No.296/H	Lower Kohistan District	H/133
40	SI Chanzeb No.394/H	Haripur District	H/135
41	SI Muhammad Farooq No.410/H	Abbottabad District	H/141

[Signature]
Regional Police Officer,
Hazara Region Abbottabad
(AEC Dilawar)

No. 15100-120 /E, dated Abbottabad the 24-05 /2018.

Copy of above is forwarded for information and necessary action to the:-

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. Additional Inspector General of Police, Elite Force Khyber Pakhtunkhwa Peshawar.
3. Additional Inspector General of Police, Special Branch Khyber Pakhtunkhwa Peshawar.
4. Deputy Inspector General of Police, CTD Khyber Pakhtunkhwa Peshawar.
5. Commandant, Police Training College Hangu.
6. All District Police Officers in Hazara Region.
7. All Superintendents of Police Investigation in Hazara Region.
8. Superintendent of Police Elite Force Hazara Abbottabad.
9. Superintendent of Police CTD Hazara Abbottabad.
10. Superintendent of Police KPF at Battagram.
11. OS/AS Region Office Abbottabad.

(Necessary Gazette Notification may be issued accordingly)

o/c

[Signature]

عزت مآب جناب محترم
انسپکٹر صاحب جنرل آف پولیس/P.R.O/خیبر پختون خواہ پشاور

اپیل نظر ثانی حکم

جناب عالی!

- (۱) گزارش ہے کہ سائل محکمہ پولیس میں بطور کنسٹیبل مورخہ 26.04.1993 کو ضلع کوہستان میں بھرتی ہوا تھا اور سائل نے سال 2003ء میں انٹرمیڈیٹ سکول کورس PTC ہنگو سے پاس کیا ہے اور سائل مورخہ 25.03.2008 کو بطور ASI پروموٹ ہوا ہے اور سائل بطور S.I. مورخہ 25.11.2014 کو پروموٹ ہوا تھا اور سائل کا عرصہ بطور S.I. تین سال چھ ماہ مکمل ہونے والے ہیں۔ سائل کی اب تک کنفرمیشن نہیں ہوئی ہے SI/OH کا پیریڈاب مکمل ہے پہلے نہیں تھا جو کہ مورخہ 29.05.2018 کو مکمل ہوا ہے۔
- (۲) اب سائل کا SI/OH کا پیریڈاب بھی مکمل ہے اور سائل کو کنفرمیشن لسٹ بحوالہ آرڈر نمبری 15100-120 مورخہ 25.05.2018 کی لسٹ سے آؤٹ کر دیا ہے جبکہ سائل سے جو نمبر S.I. کو کنفرم کر دیا ہے جو فلگ "A" ہے۔
- (۳) جبکہ میرا نام اس متذکرہ آرڈر کے سیریل نمبر 10 میں آنا تھا مگر انصاف کے تقاضوں کو مکمل نہیں کیا گیا ہے۔ میرے بیچ والے تمام کنفرم ہو گئے ہیں۔
- (۴) سائل نے اپر سکول کورس 2016ء میں پاس کیا ہے۔
- (۵) سائل کو دوسراؤں کی وجہ سے آؤٹ کیا گیا ہے جو سراسر نا انصافی ہے۔
- (۶) سائل بحوالہ سٹینڈنگ آرڈر نمبری CPB/113 مورخہ 07.05.2018 وہ مورخہ 16.03.2017 کی روشنی میں سائل کے کوائف مکمل ہیں جو فلگ "B,C" ہے۔
- (۷) سائل کو بحوالہ مقدمہ علت نمبر 1279/13 مجرم 302/34PPC تھانہ حویلیاں ATD کے مقدمہ میں ملزم کی طرف سے دی ہوئی درخواست پر سز دی گئی تھی جبکہ ملزم کے خلاف دوسرے ملزم کا مران عرف پنجابی نے عدالت علاقہ مجسٹریٹ حویلیاں کی عدالت میں اعتراف جرم کر کے ملزم سردار انیس الرحمان ولد ڈاکٹر خیب الرحمان کو از خود اپنے بیان میں شامل کیا ہے اور مدعی مقدمہ عبدالغفور/برادر مقتول عبدالشکور نے اس ملزم پر دعویداری بھی کی تھی مورخہ 30.04.2014 میں نے مقدمہ میں چالان مکمل دیا ہے اور ملزم کو بعد از BBA،

الحمد لله
[Signature]

CO یوسف خان نے خانہ نمبر 2 میں ڈالا تھا۔ چونکہ ملزم اثر و رسوخ والا تھا اور بے گناہ مجھے سزا دی گئی ہے۔

(۸) جبکہ دیگر دو نفر ملزمان کا مران عرف پنجابی، بخت گل کو 25/25 سال قید اور

3/3 لاکھ روپے جرمانہ کی سزا ہوئی ہے۔ آرڈر عدالت ہمراہ لف " " ہے۔ اس مقدمہ میں ابتدائی طور پر مجھے غلط سزا دی ہے جس کی اپیل میں نے سابقہ IGP صاحب کو کی تھی جس کا فیصلہ محمد عالم خان شنواری DIG/HQ صاحب کا لف قابل ملاحظہ ہے۔ جو لیٹر نمبری 18-6610 مورخہ 20.07.2016 کو ہوا ہے۔ کاپی لف جو فلگ "D" تا "F" ہے۔

(۹) اور اس ہی مقدمہ میں مجھے SP صاحب ایٹ آباد نے ایک عدسٹیفکیٹ CC-III معہ -/1000 روپے انعام بھی دی ہے جو سرٹیفکیٹ ہمراہ لف بطوفلگ "F" ہے۔

(۱۰) جبکہ سائل کو بحوالہ مقدمہ علت نمبر 195 مورخہ 06.02.2016 جرم 302/34 PPC تھانہ سٹی مانسہرہ کے ایک نامعلوم مقدمہ میں سزا دی ہے جس کی دعویداری ایک ماہ کے بعد ہوئی ہے۔ محکمانہ طور پر میری 4 سال سروس ضبطگی کا حکم ہوا ہے اور سائل نے DIG/HR صاحب کو اپیل کی ہوئی ہے جو آج دن تک پنڈنگ پڑی ہے جس پر کوئی فیصلہ تحریر نہیں ہوا ہے۔

(۱۱) مقدمہ علت نمبر 16/195 مورخہ 06.02.2016 جرم 302/34 میں دوبارہ مدعی مقدمہ حیدر علی شاہ کی درخواست پر HQ/PRO/DIG (Inv) صاحب نے انکوائری کی جو بحوالہ آرڈر شیٹ محررہ 22.11.2017 میں تمام مقدمہ کی سٹوری کی وضاحت موجود ہے جو آرڈر مطالعہ کا محتاج ہے جس کی کاپی لف ہے اور فلگ "K" ہے۔

(۱۲) مقدمہ علت نمبر 16/195 جرم 302/34 میں آرڈر عدالت ایڈیشنل سیشن جج صاحب -IV مانسہرہ بھی لف قابل ملاحظہ ہے جو دو نفر ملزمان کو عدالت مجاز نے K-265 کے تحت بری کیا ہوا ہے جو کہ مارک "K" دیا گیا ہے۔ اگر میری تفتیش ناقص کا کوئی فقرہ ذکر ہے تو میں قصور وار ہوں اس مقدمہ میں دو مرتبہ کرائم برانچ نے تفتیش کی ہے جنہوں نے میری تفتیش سے اتفاق کیا ہے جو فلگ "K" ہے۔

(۱۳) مقدمہ ہذا علت نمبر 16/195 کا مدعی مقدمہ بار بار درخواست بازی کرتا ہے جس کو آج دن تک کسی آفیسر نے بھی منع نہیں کیا ہے جس بناء پر افسران بالانے مجھے کنفرم نہیں کیا ہے۔ جبکہ جو درخواست فائل ہو جاتی ہے تو مدعی مقدمہ سے

بار بار درخواست لینے کا کیا مقصد ہے طریقہ کار غلط ہے، فائل درخواست
کار کا در معینا جائے ساتھ دوبارہ درخواست واپس نہ کھائے

Handwritten signature and stamp.

(۱۴)۔ جبکہ سائل کا عرصہ SI/OII بھی مکمل ہے اور سائل کے پاس 50 سے زیادہ Good انٹری بھی ہے اور تقریباً 80 ہزار روپے کے قریب کیش ایوارڈ بھی ہے۔ سروس ریکارڈ کو بھی چیک کیا جاسکتا ہے جبکہ دونوں سزاؤں کی وجہ سے سائل کو کنفرمیشن لسٹ سے آؤٹ کرنا سراسر ناانصافی ہے۔

(۱۵)۔ DIG/HR صاحب کو اس کے دفاتر میں میرے کچھ علاقہ کے اور کچھ دفاتر کے لوگوں نے میرے بارہ میں غلط بریف کیا ہے جس کے بارہ میں یہ بات مشہور ہے کہ ہزارہ "منافق" اور سندھ "صادق" ہے اور DiG صاحب ہزارہ نے مجھے مکمل طور پر سنا بھی نہیں ہے۔ ان اشخاص کے نام موقع پر بتا دوں گا جو کہ آفس میں ہیں۔

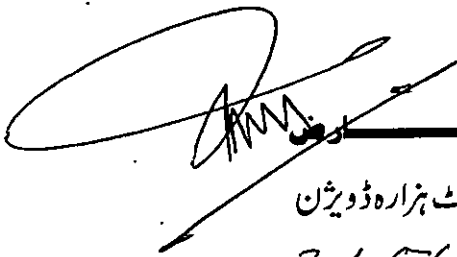
(۱۶)۔ مقدمہ علت نمبر 16/195 جرم 34/302 کی وجہ سے عرصہ دو سال تک انکوائری اور مختلف مقامات پر سزا بھگت چکا ہوں اور ذہنی طور پر ڈسٹرب بھی رہا ہوں اور اب سائل کو دونوں سزاؤں کی وجہ سے کنفرم بھی نہیں کیا ہے جو ایک دیدہ دانستہ عمل ہے جو سراسر ناانصافی ہے۔

نوٹ! اگر میں اس کنفرمیشن لسٹ سے آؤٹ ہوا تو سائل کو ڈبل پیورٹیڈ گزارنا پڑیگا جبکہ سائل کے تمام کوائف مکمل ہیں۔ عرصہ چار سال ہونے والا ہے بطور SI اگر سائل مورخہ 30.06.2018 تک کنفرم نہ ہوا تو سائل کیلئے بہت نقصان ہے۔ میری مستقبل اور سنیارٹی پر برا اثر پڑا ہے۔

بذریعہ درخواست / اپیل ہے کہ!

مندرجہ بالا حالات واقعات کو مد نظر رکھ کر سائل کو سن کر، طلب کر کے مجھے کنفرم کیا جائے۔ سائل ایک غریب ملازم ہے اور سائل گھر کا واحد سہارا ہے۔ سائل تاحیات آپ کیلئے اور آپ کے بچوں کیلئے دعا گو رہیگا۔

عین نوازش ہوگی۔



سائل محمد انور خان نمبر H/346 حال SI/OII اپر کوہستان تھانہ جالکوٹ ہزارہ ڈویژن

0301-56090800

(۱)۔ کاپی سینڈنگ آرڈر ہمراہ دو عدد لف ہے۔ 0300-9119917

(۲)۔ کاپی کنفرمیشن آرڈر بھی لف ہے

الحمد لله



28

Annex-F

Phone & Fax No. 0998 407023



OFFICE OF THE SUPERINTENDENT OF POLICE,
INVESTIGATION, UPPER KOHISTAN.

No: 919 /SRC/Invest: dated Kohistan the 11 /06/2018.

To:

The Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar.

Subject:

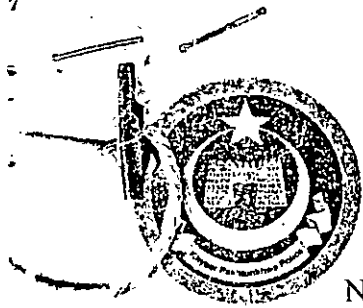
APPLICATION FOR CONFIRMATION APPEAL.

Memor:

Enclosed kindly find herewith in application and other relevant documents in respect of SI Mohammad Anwar No.346/H of this wing is hereby submitted the purpose of confirmation appeal please.

J. R. Khan
Superintendent of Police,
Investigation, Upper Kohistan

Ali
Sher



29

Annex-3
OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

No 160 / CPB, dated _____ Peshawar the _____

To: The Regional Police Officer,
Hazara Region, Abbottabad.

Subject: APPLICATION

Memo:-

Enclosed please find herewith a copy of letter No. 919/SRC, dated 11.06.2018 received from Superintendent of Police, Investigation Upper Kohistan alongwith an application of Sub-Inspector Muhammad Anwar No. 346/H regarding confirmation in the rank of Sub-Inspector.

The cases of promotion/confirmation of officers in the ranks of ASIs/SIs are dealt within concerned regions/unit.

Encls: As Above

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

Endst: No. and dated even

Copy of above is forwarded to the Superintendent of Police, Investigation Upper Kohistan with your above quoted reference.

Attested
[Signature]

①

تذکرہ ضراب دی جی ڈی سی ہزارہ ایسٹ
RPO

30

Annex-H

ضراب عالی

گزارش ہے سائٹ رقم کو لینے سے بطور کنٹریکٹ صریح

26/4 کو پھرتی ہوا ہے اور تاریخ 25/3 کو ASI پر فوٹو ہوا ہے

اور سائٹ مورخہ 25/11 کو سب انسپکٹ پر فوٹو ہوا ہے جسے سائٹ کے

ساتھ جنوں نے میٹر لگا کر اس کو رپورٹ ٹورس سے لیا اور کورس کیا ہے

وہ کنفرم سب انسپکٹ ہوئے ہیں جن کے نام وارث خان ایس 335

335/ میٹر محمد خان ایس 334 ہیں اس آڈریٹ کا ہی کا ہے

صریح 24/5 کو جو DPC ضراب سابقہ RPO کے نے پھرتی تھی

رہے سب سائٹ کا نام تھا مگر معلوم ہوا ہے کہ وہ سٹراؤٹس ہی ہے

سے ہے کنفرم کیا ہے سب نے ضراب سے دوبارہ رقم کی اپیل

کے ہی تھی مگر کوئی مثبت جواب نہ ملے ہے

مورخہ 11/6 کو حوالہ لیٹر نمبری 919 کے تحت RPO نے اپیل

کے تھے مگر معلوم ہوا ہے کہ وہ واپس RPO میں کوفارک ہوئے ہے

معلوم ہوا ہے کہ آڈریٹ کے بھی دوبارہ DPC پھرتی ہے

اب سائٹ اپنے حق کے لئے اور سٹیٹارٹ کے حصول کے لئے عدالت میں

ٹریبونل جانا چاہتا ہے سائٹ نے DPC سال 2017 کے آڈریٹ کا پی

جس میں وارث خان ایس 335/ ایس ویزہ ہیں DPC مورخہ 25/5/18

کے آڈریٹ کا پی - 3 RPO میں ہزارہ نے جس نے اپیل ہے اوٹ کیا

Attest
[Signature]

①

②

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④

(17)

اس کے رہنماؤں کا یہ فروری ہے /

④ جو اپیل منسٹرنے 14 مارچ کو حق اسی روٹنیہ بیت

14 مارچ نے جو حکم خرید کیا اس سٹیٹس کے حکم کا یہ جس

بہ تاریخ کا اندراج ہو اور ⑤ وہ سٹیٹس جس پر RPO کا

نے حکم خرید کیا ہو اس فروری ہے اس کے ساتھ انگریزی

سٹیٹس ہے جو اس ظلم کا حکم کا روٹنیہ اس کے حق کے لئے

عدالت جانا چاہتا ہے۔

بذریعہ درخواست استدعا ہے کہ مندرجہ ذیل روٹنیہ کے


روٹنیہ بیت جن جن آرڈرز کا ذکر ہوا ہے اس کے پیمانے دینے کا

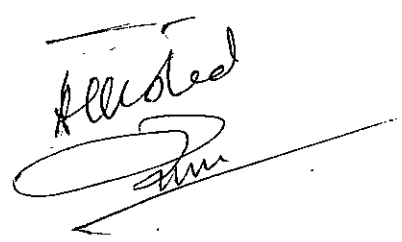
حکم صادر فرمایا جائے اس کے ساتھ ساتھ

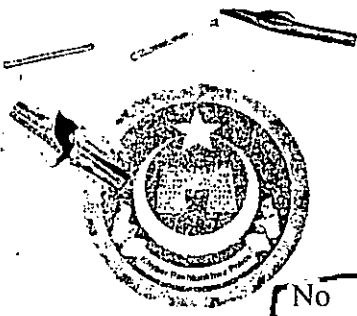
عین توازن ہو

ان کے

سٹیشن ڈائریکٹرانٹ 346 صفحہ 14/15 جیلوٹ ایڈووکیٹس


 4-8-2018





Annex-9

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

32

No 160 / CPB, dated Peshawar the 11/07/2018

To: The Regional Police Officer,
Hazara Region, Abbottabad.

Subject: APPLICATION

Memo:-

Enclosed please find herewith a copy of letter No. 919/SRC, dated 11.06.2018 received from Superintendent of Police, Investigation Upper Kohistan alongwith an application of Sub-Inspector Muhammad Anwar No. 346/H regarding confirmation in the rank of Sub-Inspector.

The cases of promotion/confirmation of officers in the ranks of ASIs/SIs are dealt within concerned regions/unit.

Encls: As Above

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

Endst: No. and dated even

Copy of above is forwarded to the Superintendent of Police, Investigation Upper Kohistan with your above quoted reference.

Ec
In m.a.

Mogha
=1377

A. Iftedal

A/D.I. G. Police
Hazara Region
Abbottabad

16-8-18

DBA No: 206
 BC No:

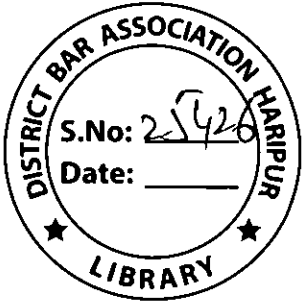
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 Name of Advocate: محمد اسلم تھری

S.No: 25426



وکالت نامہ



بعدالت: جناب جسٹس مین صاحب خیر بنجیون خواہ سروس ٹریڈینگز پرائیویٹ لمیٹڈ
 عنوان: محمد انور
 منجانب: ایڈوانسڈ محمد انور
 نوعیت مقدمہ: سہولت ایبل
 باعث تحریر آنکھ: _____

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصدیق مقدمہ بمقام ایڈوانسڈ ٹریڈینگز پرائیویٹ لمیٹڈ
 محمد اسلم تھری ایڈووکیٹ کی طرف سے

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مکار خاص روبرو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس کے تاشی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجرائے ڈگری بھی صاحب موصوف کو بشرط ادا سنگی علیحدہ مختانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مقرر یا اس کے کسی جزوی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

Accepted by
 M. Aslam

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ مورخہ: 2018/08/24 دن 24 ماہ 08 سال

(Muhammad Anwar Appellant)

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

Service Appeal No. 1056 /2018

Mohammad Anwar Sub Inspector Presently posted as OII
PS Jalkot, Upper Kohistan.

(Appellant)

VERSUS

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.

(Respondents)

Parawise Comments on behalf of Respondents

Respectfully Sheweth:

PRELIMINARY OBJECTION:-

1. That the appellant has no cause of action.
2. That the appellant has not come to this Tribunal with clean hands.
3. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
4. That the appellant is estopped by his own conduct.
5. That the appeal is barred by law.
6. That the appeal is time barred.
7. That the appellant has suppressed the material facts from the Honourable Tribunal hence not entitled for any relief and appeal is liable to be dismissed without further proceeding.

FACTS.

Para No.1. Pertains to record. However, the service record bears adverse entries.

Para No.2. Incorrect, he was promoted as officiating ASI on 08-04-2008 and after completion of 02 years officiating period he was confirmed as ASI and his name was brought on promotion list "E" on 08-04-2010.

Para No.3. Pertains to record.

Para No.4. Incorrect, he was deferred from confirmation as Sub-Inspector in the DPC held in the office of RPO Hazara on 09-10-2017 as he

failed to perform duty as SHO / OII for one year as per mandatory criteria laid down in Police Rules 13-10 (2). He had served only 05 months & 13 days at the time of DPC. His colleagues have completed the period of posting before confirmation.

Para No.5. Incorrect, he was deferred from confirmation as Sub-Inspector in the DPC held in the office of RPO Hazara as he was awarded major punishments i.e. reduction in pay for 03 stages and reduction in service for 04 years on 26-04-2017 as per Police Rules 13-14 (2).

Para No.6. Correct, he has qualified the Upper College Course in PTC Hangu in the year, 2016 but he was deferred by the DPCs for confirmation as Sub-Inspector as he has not fulfilled the mandatory tenure of posting as OII and due to award of major punishments.

Para No.7. Incorrect, as explained in Para "4 & 5".

Para No.8. Pertains to record.

Para No.9. His departmental appeal was sent back by the Inspector General of Police Khyber Pakhtunkhwa Peshawar to RPO Hazara as the confirmation in the rank of Sub-Inspector was the competency of Regional Police Officer.

Para No.10. Pertains to record.

Para No.11. Incorrect, he was deferred from confirmation as Sub-Inspector in the DPC held in the office of RPO Hazara on 09-10-2017 as he failed to fulfill the criteria laid down in Police Rules 13-10 (2) and due to major punishment.

Para No.12. Incorrect as explained in Para "4,5 &11".


GROUND


- a. Incorrect, he failed to perform duty as SHO / OII for one year as per Police Rules 13-10 (2). He served only 05 months & 13 days period of posting as OII at the time of DPC.
- b. Incorrect. The act of Respondents is in accordance with law & rules.
- c. Incorrect, case of each officer was discussed for confirmation as provided vide Police Rules 13-1, 13-10 (2), 13-18 of Police Rules 1934 and relevant Standing Orders received from CPO Peshawar.
- d. Incorrect, as explained in Para "a & c".

- e. Incorrect, as briefly explained in Para 4 and 5 above, the appellant failed to fulfill the mandatory criteria laid down in the rules to consider him for confirmation.
- f. Incorrect, as explained in Para "a" as he has not fulfilled the criteria as laid down in Police Rules 13-10 (2).

PRAYER.

It is therefore, humbly requested that the appeal of the appellant may graciously be dismissed being meritless and not maintainable.


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar
(Respondent No. 1)


Regional Police Officer,
Hazara Region, Abbottabad
(Respondent No.2)

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

Service Appeal No. 1056 /2018

Mohammad Anwar Sub Inspector Presently posted as OII
PS Jalkot, Upper Kohistan.

(Appellant)

VERSUS

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.

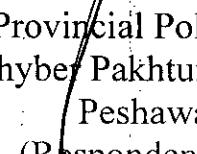
(Respondents)


AFFIDAVIT.

We, do hereby affirm on oath that the contents of written reply
are true to the best of our knowledge & belief and nothing has been
concealed from the honorable Service Tribunal.

Submitted please.

For


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar
(Respondent No. 1)


Regional Police Officer,
Hazara Region, Abbottabad
(Respondent No.2)