

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

Service Appeal No. 14056/2020

Jan Bahadur S.I MR-28
Investigation Wing Charsadda.

.....Appellant

V E R S U S

The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar & others

.....Respondents

INDEX

S.No	Documents	Annexure	pages
1	Reply	---	1-4
2	Bad Entries	A	5-11
	Notification dated 17 th March 2020	B	12-13
3	Notification dated 28.05.2019	C	14-20
4	Esta Code	D	21
5	Representation for appeal	E	22-23
6	Affidavit	-	24

RESPONDENTS

Through


Shah Jehan, ASI
Charsadda

①

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

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Investigation Wing Charsadda.

.....Appellant

V E R S U S

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.....Respondents

REPLY BY RESPONDENTS NO.1 TO 3

Respectfully Sheweth: -

PRELIMINARY OBJECTIONS

1. That the appellant has got no cause of action.
2. That the appeal is badly barred by law and limitation.
3. That the appellant has been estopped by his own conduct to file the instant appeal.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to the Honourable Tribunal with clean hands.
6. That the appeal is bad for mis-joinder and non-joinder of necessary parties.

On Facts

1. Initial part of the para pertains to record, however, it is stated that service record of the appellant is tainted with bad entries. Details of bad entries are annexed as "A".
2. Denied as drafted. Appellant was promoted as Offg: Sub-Inspector in the year 1995 vide order dated 12.05.1998 was deputed to National Highways & Motorway Police, as Patrol Officer in BPS-14 for a period of 3 years and later on, on 24.03.2020 vide Notification No. NHMP-42(7)/2020/HRM/SPO/661 dated 17.03.2020 he joined duty in his parent department (copy of notification is annexed as annexure B).
3. As explained above, however, the appellant has not arrayed National Highway authority as a necessary party, they are in better position to reply this para.
4. Correct to the extent that appellant along-with other officers, who had been inducted in National Highways & Motorway Police, was de-inducted vide Notification dated 28.05.2019 and vide Notification dated 17.03.2020 was repatriated to his parent department in his substantive rank. Copy of Notifications dated 28.05.2019 is annexed as 'C'. It is worth to mention

(2)

that in the Judgment dated 05.10.2018 passed by the august Supreme Court of Pakistan reference has been made to another order dated 16.01.2007 wherein the following remarks was passed:

“the seniority of the Police officials in the NH&MP shall be re-fixed. The deputationists (Police officials) who were inducted in NH&MP by extending the benefit of one step higher than their substantive rank in the parent department, shall be assigned seniority from the date they were permanently absorbed in the department by the notification issued by the competent and their seniority shall be placed at the bottom. The step promotion cannot be equated as out of turn promotion in terms of judgments of this Court reported as Contempt Proceedings against Chief Secretary Sindh 2013 SCMR 1752 and Ali Azhar Khan Baloch VS Province of Sindh 2015 SCMR 456. In fact the principles which this Court has enunciated in the case of Ch. Muhammad Akram VS The Registrar, Islamabad High Court, Islamabad (PLD 2016 SC 961) would attracted in the case in hand where the issue of the nature was dealt with by this Court. The seniority of all the Police Officials shall be finalized in the above terms from the date when they were permanently absorbed in the department, placing them at the bottom of seniority as concluded hereinabove.”

In the said order it has nowhere been mentioned that appellant or other officers will be given seniority with their batch-mates.

5. Correct to the extent that appellant and other officers were repatriated to their parent departments from NH&MP in their substantive rank, pay & allowances vide Notification dated 17.03.2020.. It is worth to mention that in the said Notification only reference has been made to the Judgment passed by the august Supreme Court of Pakistan in Crl.Review Petition No.193/2013 in Criminal Original Petition No.89/2011 titled as Ali Azhar Baloch VS Chief Secretary Govt of Sindh, reported as 2015-SCMR 456 para 160.
6. Incorrect. Appellant was given his due seniority and was placed in the seniority list of Sub-Inspectors because appellant was permanently inducted in NH&MP vide Notification dated 24.04.2003 meaning thereby that he was no more employee of the respondent department. However, vide Notification dated 17.03.2020 appellant alongwith other officers was repatriated to his parent department. It is worth to mention here that w.e.from 24.04.2003 to 17.03.2020 appellant was not part of the respondent department. As far as departmental appeal is concerned, it is stated that proper opinion was sought from AIG Legal CPO Peshawar and AIG Legal opined that:

“According to ESTA CODE (Establishment Code Khyber Pakhtunkhwa)

Sl. No.4 - Policy governing Civil Servants on deputation basis.

“Government may allow an officer to continue against his assignment abroad even after the expiry of 5 years on the request of the officer or his employer. However in all such cases, the officer’s name will be removed from the existing seniority list and placed on a separate static list with no claim to promotion or to seniority over any junior who may be promoted during this period. An officer’s name would be brought back on the seniority list only after he resumes duty on return. In such cases also the officer must earn a confidential report for one full year before he is considered for promotion. If approved for promotions, he will not regain his seniority. He will be assigned seniority in the higher post only from the date of assumes its charge”. The rule of Esta Code is clear, may followed, please (annexed as annexure D).

7. That the appeal of the appellant is liable to be dismissed on the following grounds: -

GROUNDS


- A. Incorrect. Appellant cannot be given seniority and promotion with batch-mates because for such promotions appellant has not fulfilled the requisite courses/criteria, hence rejection order of his appeal dated 30.09.2020 is accordance with law & rules. Copy of rejection order is annexed as ‘E’.
- B. Incorrect. At the time of induction to NH&MP appellant was in the rank of Sub-Inspector, hence on his repatriation to parent department he was placed in the seniority list of Sub-Inspectors.
- C. Incorrect. In the Notification dated 17.03.2020 only reference has been made to the Judgment passed by the august Supreme Court of Pakistan in Crl.Review Petition No.193/2013 in Criminal Original Petition No.89/2011 titled as Ali Azhar Baloch VS Chief Secretary Govt of Sindh, reported as 2015-SCMR 456 para 160.
- D. Incorrect. No discrimination has been made to the appellant. Each Province or Capital area have set their own criteria for promotion of Police officers to the next rank. One criteria cannot be generalized for all the provinces/capital area.
- E. Para already explained.
- F. Para already explained.
- G. Incorrect. Any officer/official, who joins other department on deputation, is given his substantive rank when repatriated to his parent department.
- H. Incorrect. Appellant has served in NH&MP more than five years and inducted in the said federal department and now he has been retired from service in his original rank of parent department. He cannot claim benefit of seniority

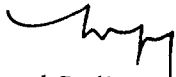
4

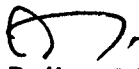
and promotion in parent department due to his long deputation period i.e about 22 years in NH&MP.

- I. The respondents also seek permission of this Honourable Tribunal to advance additional grounds at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of above submissions the appeal of the appellant may very kindly be dismissed with cost, please.


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 01)


Regional Police Officer,
Mardan Region-I, Mardan.
(Respondent No. 02)


District Police Officer,
Charsadda.
(Respondent No.03)

15. CENSURES AND PUNISHMENTS. --concl.

Serial No.

Last warning for absence on 6-2-2000
from 0600 hrs to 1220 Hrs. vide O. No.
FMP-SPINH & MP/IBD/6199, dt. 18²/₂₀₀₀

[Signature]

Naik by name
AIG(E)/INH & MP.

8/B. Awarded a punishment of warning
for extending 17-helms (copy) to Computers
vide O. No. SSP/INH & MP/IBD/6199, dt. 17⁵/₂₀₀₁

[Signature]

Naik by name
AIG(E)/INH & MP.

9/B. Awarded a minor punishment of warning
as he was found in relaxed position checked
by the vigilance team vide order No. P(F)/SSP/N-III/8239 dt 7¹²/₀₅

[Signature]
Drawing & Disbursing Officer
National Highways & Motorway Police
N-5 North

10/B: Awarded a punishment of CENSURE due
to failure of attending a break down truck for
50 minutes vide order No P(F)/SSP/N-III/8240 dt. 7-12-05

[Signature]
Drawing & Disbursing Officer
National Highways & Motorway Police
N-5 North

15-CENSURES AND PUNISHMENTS.—contd.

Serial No.

4B. Charge: For his absence from the General Parade.

Punishment: Awarded a censure for his care full in future.

OB No 648
of 18/3/85

SP/A

6B. Charge:- For his negligence in case 13 A0/188 PPE vide FIR No: dated 20-11-86 PS A, Division.

Punishment: Increment stopped for a of two years with out any effect.

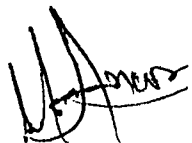
OB No: 957
15-6-87

SP/A

6B. Awarded Censure.

OB No. 725

dt: 29-5-96


Superintendent
Police Swabi

7-B. Awarded minor punishment of "Censure" on account of a fatal accident took place near Excise Check Post in Beant Kunra. SPO. Jem Bahadur, the admin officer reached on the site, vide order No. SSP North-III/14-5/83/175, dated 12-1

MM

13. For Special Improvement to the Assessment of P.O. during the month of 3/96, therefore warned for poor performance.

OB. No. 479

dt. 7-4-96

[Signature]
Superintendent of
Police Swabi

14. Awarded punishment of Censure for not arresting any P.O. in last 24 hours vide P.O. diary dated 1-4-96 vide DIG of Police Mardan Range Mardan memo. No 721/6 dated 4-4-96.

OB. No. 481

dt. 7-4-96

[Signature]
Superintendent of
Police Swabi

15. Warned for his poor performance for not arresting P.O./M.D on 13-4-96 as evident from DSR

OB. No. 506

dt. 14-4-96

[Signature]
Superintendent of
Police Swabi

1-B: Warning: Awarded punishment of warning, in spite of minor, Accident He Remained present, vide order No. 1(40)/SSP/N-10/05/N-5/4329.

[Signature]
Drawing & Disbursing Officer,
National Highways & Motorway Dept.
B-5 Murth

2-B Warning: Awarded punishment of warning Round without Cap. vide order No. 1(40)/SSP/N-10/05/N-5/4218 dated 3rd March, 2005.

[Signature]

(C) (D) (8)

CHARACTER ROLL OF

8. NAMES OF RELATIVES IN GOVERNMENT SERVICE.

(Continued.)

1	2	3	4
Name	Relationship	Nature of employ	District

9. NAME, RESIDENCE AND OTHER PARTICULARS OF HEIRS.

Wife.

Increment stopped for a period of two years without accumulative effect

OB No. 957
15-6-87

SP/Mandala

Father.

Mother

Pay provisionally fixed in the revised Basic pay scale 1987 @ Rs: 775/- + 25/- (Advance increments on B.A) 800/- p m

Brother.

w-e-from 1-7-87)

Sister.

vide Govt: of NWFP Finance Department

Letter No. FD (PRC) 1-1/87-V.III dated 22-7-87

has been verified from the pay bills & copy kept on this office records.

Signature of Officer

has been verified from the pay bills & copy kept on this office records.

Signature of Officer

SP/ma

(9)

1	2	3	4	5	6	7
	Whether substan- tive or officiating and whether	If officiating state (i) substantive appointment, or under Art. 371 C. S. R.		Additional Pay for	Other emolument falling under the	Date of

OFFICE ORDER

04 days earned Leave sanctioned w.e.f. 22/12/2003 to 25/12/2003 while posted in Beat-33 vide order NO 1 () SSP (North-III) / N-5/5148 dated 22nd December 2003.

[Signature]
Drawing & Disbursing Officer
National Highways & Motorway Police
N-5 North

CENSURE

Awarded - Censure while posted in Beat 33, vide order No 2 () SSP (N-III) N-5/83/25 dated 1st Jan. 2004

[Signature]
Drawing & Disbursing Officer
National Highways & Motorway Police
N-5 North

CENSURE

Awarded punishment of Censure while posted in Beat 33 vide order NO. () SSP (NORTH III) / N-5/03/175 dated 19th Jan. 2004.

[Signature]
Drawing & Disbursing Officer
National Highways & Motorway Police
N-5 North

LEAVE WITHOUT PAY

CENSURE

Awarded punishment of Censure due to found absent from official duty for 01 day, 20 hours and 15 minutes, and the absence period is treated as leave without pay vide S.S.P. Order No. 1(49) SSP (North-III) / N-5/05/3579 dated 17/01/2005

[Signature]
Drawing & Disbursing Officer
National Highways & Motorway Police

(10) ()

8 Signature of Government servant	9 Signature and attestation of the office or other attesting officer in attestation columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government Period Government to which debitable		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
			LAST WARNING					<p>Awarded a minor punishment last "warning" on account of absent from duty while deputized at Tiger-6 of beat no. 07 on 6-2-2000 pursuant to order No. 1570/MS. Wd. vide order No. SSP/148 PMP/1001/199 dated 18-1-2000.</p> <p style="text-align: right;">Y AIG (E2) / 148 PMP "AIG (Estt.) NH & MP, Islamabad"</p>
			WARNING					<p>Awarded "warning" on account of while posting in beat-2 was required to facilitate the construction of motorway, but during the month of March, 2000 while order No. SSP/148 PMP/1001/199 dated 17-3-2000.</p> <p style="text-align: right;">M AIG (E2) / 148 PMP "AIG (Estt.) NH & MP, Islamabad"</p>
			TR. 78					<p>det. d. 11/08/2020 S-10 verified for arrears Rs. 350,980/- in pay & allowances w.e.f. 01/4/2020 To 30/07/2020</p> <p style="text-align: center;">Proceedings DAO Ch.</p>

Sheet
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(11)

1	2	3	4	5	6	7	
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'Pay'	Date of appointment	Signature (Government)

Appointment as Temp ASI at the Basic pay scale No-B-5 of Rs (52048-880) at B/S on w.e.f 8-4-84 vide Dir PR letter no. 3420-25/E dt 5-4-84.

P. I. as P. ASI @ Rs 18,538/- PM. with effect from 1.12.1984

S. P. Mirdan.

P. I. as P. ASI @ Rs 18,556/- PM. with effect from 1.12.1985

S. P. Mirdan.

One Adv. in the nature of B-5 at Rs 25,200/- with next increment on 1.12.89

P. I. as P. ASI @ Rs 18,574/- PM. with effect from 1.12.1986

S. P. Mirdan.

Accounts Officer

Charge: For his negligence in case no. 13A0/188 PPe vide FIR No: 74, dated 20-11-86 PS (A) Division.

Punishment: Increment stopped for a period of two years with out accumulative effect.

OB No: 957
15-6-87

S.P. Mirdan

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
NATIONAL HIGHWAYS AND MOTORWAY POLICE
MAUVE AREA, G-11/1, ISLAMABAD

OFFICE OF THE SSP N-5
No. 867
20-3-2020

NHMP-42(7)/2020/HRM/SPO/867

Islamabad. 17 March, 2020

NOTIFICATION

In continuation to this office earlier Notification No. NHMP-38(6)/18/HRM/SPO-PO/1495 dated 28-05-2019 and in compliance of order / judgment dated 05-10-2018 passed by the Honourable Supreme Court of Pakistan in Criminal Review Petition No. 207/2018 in Criminal Original Petition No. 89/2011, its connected cases and the order / judgement dated 05-10-2018 passed in the Criminal Original Petition No. 36/2017 and 22/2017 in Criminal Original Petition 89/2011 and orders dated 16-05-2014, 30-05-2014, 25-02-2016 and 17-06-2016 passed by the Honourable Sindh High Court, Karachi, in Constitution Petition No. D-331 of 2013 and upon dismissal of Writ Petition No. 2481/2019 and Intra Court Appeals No. 314/2019 & 317/2019 by the Honourable Islamabad High Court, Islamabad vide judgment passed on 11-07-2019 & 12-02-2020, respectively, **following de-inducted officers** are hereby **repatriated** from National Highways & Motorway Police (NHMP) to their parent departments in their substantive rank, pay & allowances, with immediate effect:-

S #	Rank & Name & No. of Officers	Parent Department	Present Posting Zone
1	SPO Muhammad Ameer (2378, S-381)	ICT Police	Motorway
2	SPO Khalid Mehmood Loni (S-21)	Balochistan Police	West
3	SPO Ghulam Safdar Awan (303/M, S-18)	Punjab Police	N-5 North
4	SPO Muhammad Iqbal (R/155, S-336)	Punjab Police	N-5 North
5	SPO Malik Abdul Ghani (GL-458, S-268)	Punjab Police	PLHQ Zone
6	SPO Jan Bahadur Khan (65/MR, S-38)	Khyber Pakhtunkhwa Police	N-5 North
7	SPO Ghulam Yasin, (769/GL, S-423)	Punjab Police	N-5 North
8	SPO Mian Abdul Rauf (M/65, S-56)	Punjab Police	N-5 Central
9	SPO Zahid Khan (ID/116, S-285)	ICT Police	N-5 North
10	SPO Naseem Akhter Kalyar (L/493, S-363)	Punjab Police	Motorway
11	SPO Shahida Yasmeen (S-344)	Punjab Police	Motorway
12	SPO Muhammad Shahbaz Khan (S-397)	Punjab Police	Trg. College
13	SPO Murzed Hussain (S-472)	Sindh Police	M-4
14	SPO Khizar Hayat (405/K, S-55)	Punjab Police	Motorway

2. The matter of seniority and other consequential benefits on repatriation to parent department has been settled by the Honourable Supreme Court of Pakistan in the judgment passed in CrI. Review Petition No. 193/2013 in Criminal Original Petition No. 89/2011, titled Ali Azhar Baloch versus Chief Secretary, Government of Sindh reported as 2015 SCMR 456. Para-160 of the said judgment is as under:-

".....The officers/officials who have been repatriated to their parent departments shall be entitled to salaries and other benefits from the date they were relieved to join their parent departments. Their seniority shall be maintained in their parent departments with their batchmates as if they were never relieved from their parent departments. Expiry of period lien shall not come in the way of the officers to deprive them from joining the parent department..."

OFFICE OF THE DIG N-5 (NORTH)

1	DIG N-5 North	
2	SSP North-I	✓
3	SSP North-II	✓
4	SSP North-III	✓
5	PSO to DIG North	
6	OS North	
7	DDO North	✓
8	Ops Officer	
9	OSI	D.O. 2017/Repatriation
10	CP-IT	
11	MTO	
12	I/C Stores	
13	I/RC	

For information & further
n/a as per rule

Page 1 of 2
concerned off
n/c

164
D. 2020
20

13

3. The above named officers may be relieved immediately by Zonal/Sector Office with the directions to be conveyed to concerned Beat Commander for his formal relieving. However, LPC be issued after receipt of uniform articles, Arms & Ammunition and departmental E-Card issued to the officer and clearance from all concerned sections including R&W Fund.

The app... section...

(SYED HASHMAT KAMAL) PSP
Assistant Inspector General (HRM)
for Inspector General, NHMP

The Manager,
Printing Corporation of Pakistan Press,
University Road, Karachi-V

Copies to:-

- All IsGP/ Provincial Police Officers, Islamabad, Lahore, Peshawar, Karachi & Quetta.
- All Addl. IsGP, NHMP.
- ✓ All DsIG & SP (HQs), NHMP. It is requested that copy of relieving order of above mentioned officers may be forwarded to this office for completion of record.
- The DIG (Establishment-I), Punjab Police, Lahore. Copy of joining report of these officers may be sent to this office for record, please.
- The AIG (Finance), NHMP, Islamabad. It is requested that if any amount of R&W Fund is pending, the same may be communicated to Motorway Zone immediately so that the same can be recovered before issuance of LPC.
- All AIsG (Establishment), Provincial Police, Islamabad, Lahore, Peshawar, Karachi & Quetta. Copy of joining report of these officers may be sent to this office for record, please.
- Accounts Officers, GA-I, AGPR, Islamabad/ Sub Offices, Lahore, Peshawar, Karachi & Quetta.
- DDO/ Accountant, concerned zones.
- DSP/CPO (Legal), NHMP, Islamabad.
- Officers concerned.
- Computer Operator (HRM Branch).
- Master File.

b

(SYED HASHMAT KAMAL) PSP
Assistant Inspector General (HRM)
for Inspector General, NHMP

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
NATIONAL HIGHWAYS AND MOTORWAY POLICE
MAUVE AREA, G-1/11, ISLAMABAD

NH&MP-JB(6)/18/HRM/SPO-PC/1495

NOTIFICATION

Islamabad 28th May, 2019

This notification is issued in compliance with the order / judgment dated 05-10-2018 passed by the Honourable Supreme Court of Pakistan in Criminal Review Petition No. 207/2016 in Criminal Original Petition No. 89/2011, its connected cases and the order / judgement dated 05-10-2018 passed in the Criminal Original Petition 35/2017 in Criminal Original Petition 89/2011, Criminal Original Petition 22/2017 in Criminal Original Petition 89/2011 and order dated 16-05-2016, order dated 30-05-2014, order dated 25-02-2016 and order dated 17-06-2016 passed by the Honourable Sindh High Court, Karachi, in Constitution Petition No. D-331 of 2013, the following officers who were inducted in National Highways & Motorway Police (NHMP) above BPS-07, are hereby re-inducted. They shall stand as deputationists till the process of their repatriation to their parent departments is completed:-

S.N	Name & Number & Father's Name	Date of absorption in	Rank of Absorption and	Parent Department	Present Posting Zone
1.	Iqbal Atuned Khan No. S-30 S/O Sana M. Khan	24-04-2003	SPO (BPS-16)	Sindh Police	PLHQ
2.	Nasim Hayat, No. S-7 S/O M. Shahadat	24-04-2003	SPO (BPS-16)	Punjab Police	N-5 North
3.	Iman Elahi, No. S-13 S/O Faisal Elahi	24-04-2003	SPO (BPS-16)	Punjab Police	PLHQ
4.	Abdul Khalil, No. S-15 S/O Abdul Majid	24-04-2003	SPO (BPS-16)	Punjab Police	N-5 Central
5.	Musir Ahmed, No. S-17 S/O Munshi Ahmed	24-04-2003	SPO (BPS-16)	Sindh Police	N-5 Central
6.	Rana Zafar Ullah Mehdi, No. S-6 S/O Mehdi Khan	24-04-2003	SPO (BPS-16)	Balochistan Police	Motorway
7.	Asad Dawood No. S-37 S/O M. Dawood	24-04-2003	SPO (BPS-16)	Balochistan Police	N-5 North
8.	Khalid Mahmood Loni, No. S-21 S/O Muhammad Khan	24-04-2003	SPO (BPS-16)	Balochistan Police	West Zone
9.	Ghulam Saffar, No. S-18 S/O Mian Muhammad	24-04-2003	SPO (BPS-16)	Punjab Police	N-5 North
10.	Rana Ghulam Mujtaba, No. S-24 S/O Ahsan Ali	24-04-2003	SPO (BPS-16)	Punjab Police	Motorway
11.	Nasir Hayat, No. S-31 S/O Zahoor ul Haq	24-04-2003	SPO (BPS-16)	Punjab Police	N-5 North
12.	M. Amjad Rauf No. S-1 S/O Abdur Rauf	24-04-2003	SPO (BPS-16)	Punjab Police	N-5 South
13.	Mian Abdur Rauf No. S-56 S/O Mukhtar Ahmed	24-04-2003	SPO (BPS-16)	Punjab Police	N-5 Central
14.	Muhammad Altaf, No. S-40 S/O Munsabdar Khan	24-04-2003	SPO (BPS-16)	Punjab Police	N-5 Central
15.	Sajjad Hussain, No. S-44 S/O Allah Yar Khan	24-04-2003	SPO (BPS-16)	Punjab Police	Motorway
16.	Khurshid Ahmed Rana, No. S-23 S/O Jamil Khan	24-04-2003	SPO (BPS-16)	Balochistan Police	N-5 Central
17.	Jan Bahadur, No. S-38 S/O Amir Bahadur	24-04-2003	SPO (BPS-16)	KP Police	N-5 North

13	M. Asghar, No. S-10 S/O Malik Khizar Hayat	24-04-2003	SPO (BPS-16)		
19	Mukhtar Ali No S-3 S/O Abdul Malik	24-04-2003	SPO (BPS-16)	Punjab Police	Motorway
20	Babar Mahmood No S-34 S/O Muhammad Khan	24-04-2003	SPO (BPS-16)	KP Police	Trg. College
21	Muhammad Younis, No. S-13 S/O Ghulam Ahmed	24-04-2003	SPO (BPS-16)	Punjab Police	N-5 North
22	Muhammad Younis No. S-11 S/O Dhan Khan	24-04-2003	SPO (BPS-16)	Punjab Police	Motorway
[REDACTED]					
23	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
24	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
25	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
26	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
27	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
28	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
29	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
30	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
31	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
32	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
33	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
34	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
35	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
36	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
37	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
38	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
39	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
40	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
41	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
42	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
43	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
44	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
45	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
46	S/O M. Asghar	24-04-2003	SPO (BPS-16)		
47	S/O M. Asghar	24-04-2003	SPO (BPS-16)		

48.	Shahid Yamin No. S-344 S/O M. Siddique	27-12-2003	SPO (BPS-16)	Sindh Police	Motorway
	Hamid Khan, No. S-287				
50.	S. Ahsan Raza Zaidi No. S-314 S/O Mansoor Ali Zaidi	27-12-2003	SPO (BPS-16)	Sindh Police	Motorway
51.	Hafiqat Hayat Terar No. S-284 S/O Umar Hayat	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 South
52.	Mansoor Ahmed Alvi No. S-312 S/O Ahtilque Ahmed	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 North
53.	Nazir H. Khan, No. S-334 S/O Muhammad Diji	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 South
54.	Alam Sher Watto, No. S-318 S/O Haji Bashir Ahmed	27-12-2003	SPO (BPS-16)	Punjab Police	West Zone
55.	Malik M. Fayyaz No. S-351 S/O Malik M. Nawaz	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 Central
56.	S. Shabab Haider Jalili No. S-306 S/O Ghazanfar Hussain	27-12-2003	SPO (BPS-16)	Punjab Police	Motorway
57.	Habib Ullah Jakhio No. S-303 S/O Haji M. Murad	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 South
58.	Ahmed Hussain Saddiqi No. S-313 S/O Mukhtar H. Saddiqi	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 South
59.	Khalid Iqbal No. S-310 S/O Iqbal Ahmed Quershi	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 South
60.	Ghulam Muhammad No. S-322 S/O Allah Din	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 Central
61.	Amjad Hussain No. S-283 S/O Ahmed Din	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 North
62.	Ashraf Jan No. S-304 S/O Raman Gul	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 South
63.	Hamid Ali Zaidi, No. S-296 S/O Hasnat Ali Zaidi	27-12-2003	SPO (BPS-16)	Sindh Police	Motorway
64.	M. Humayun Khan No. S-295 S/O Jamal ud Din	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 Central
65.	Hamid Mansoor Nawaz No. S-330 S/O Muhammad Nawaz	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 North
66.	Hassan Khan Marwar No. S-298 S/O Musoon Khan	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 North
67.	Abdul Razzaq Sayal No. S-309 S/O Muhammad Salfat	27-12-2003	SPO (BPS-16)	Sindh Police	West zone
68.	Mumtaz Ahmed Bhatti No. S-320 S/O Ameer Khan	27-12-2003	SPO (BPS-16)	Punjab Police	Motorway
69.	Ghulam shabbir No. S-352 S/O Abdul Majid	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 South
70.	Abdul Ghani, No. S-268 S/O Nazim Khan	27-12-2003	SPO (BPS-16)	Punjab Police	PLHQ
71.	Jahangir Nawaz, No. S-329 S/O Gul Nawaz	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 North
72.	M. Yousaf Gundal No. S-299 S/O Sai Muhammad	27-12-2003	SPO (BPS-16)	Sindh Police	Motorway
73.	Mulik Naeem Ashraf No. S-365 S/O M. Ashraf	27-12-2003	SPO (BPS-16)	Sindh Police	Motorway
74.	Akhtar Nawaz No. S-300 S/O Muhammad Nawaz	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 North
75.	Rizwan Hussain No. S-303 S/O Mujtaba Ahmed	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 South
76.	Mikhar Ahmed No. S-273 S/O M. Siddique	27-12-2003	SPO (BPS-16)	Punjab Police	Motorway
77.	Sardar Amir Azam No. S-267 S/O Amir Abdullah	27-12-2003	SPO (BPS-16)	Punjab Police	Motorway

78	Amamillah Sheikh No. S-302 S/O M. Ramzan	27-12-2003	SPO (BPS-16)		
79	Farrukh Iqbal Dar No. S-308 S/O Zafar Iqbal	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 South
80	Nadeem Umar Farooqi No. S-307 S/O M. Aslam Farooqi	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 Central
81	Fida Muhammad No. S-277 S/O Sher Muhammad	27-12-2003	SPO (BPS-16)	Sindh Police	N-5 Central
82	Sajjad Akbar No. S-276 S/O M. Khan			Punjab Police	Motorway
83	S/O M. Khan		SPO (BPS-16)		
84	Anjnd Melimood No. S-278 S/O M. Ishtiaq	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 North
85	M. Zahid Khan No. S-285 S/O Abdul Kabir	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 North
86	Kazim Mansour No. S-261 S/O Manzoor Hussain	27-12-2003	SPO (BPS-16)	Islamabad Police	N-5 North
87	Anam Hayat No. S-265 S/O Muhammad Hayat	27-12-2003	SPO (BPS-16)	Islamabad Police	N-5 North
88	Syed Sajjad Haider No. S-355 S/O Iqbal Hussain	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 Central
89	Muhammad Aslam No. S-270 S/O Falek Sher	27-12-2003	SPO (BPS-16)	Punjab Police	Motorway
90	Saeed Ahmad Cheema No. S-274 S/O Ghulam Mustafa	27-12-2003	SPO (BPS-16)	Punjab Police	Motorway
91	Indranzeb No. S-289 S/O Sultan Muhammad	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 Central
92	M. Akram Dogar No. S-324 S/O M. Sharif	27-12-2003	SPO (BPS-16)	KP Police	N-5 North
93	Muhammad Farooq No. S-271 S/O Saleh Muhammad	27-12-2003	SPO (BPS-16)	Punjab Police	Motorway
94	Gul Nawaz Nisri No. S-264 S/O M. Jan Khan Nisri	27-12-2003	SPO (BPS-16)	Punjab Police	Motorway
95	S. Qamar Raza Shah No. S-361 S/O Ghulam Raza Shah	27-12-2003	SPO (BPS-16)	Punjab Police	West Zone
96	Mian Akhtar Ali No. S-315 S/O Sardar Muhammad	27-12-2003	SPO (BPS-16)	Railway Police	Motorway
97	Ghulam Jaffar No. S-262 S/O Haji Nazir Ahmed	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 North
98	Mumtaz Ahmed Wahla No. S-353 S/O M. Din	27-12-2003	SPO (BPS-16)	Punjab Police	N-5 Central
99	M. Hanif Sani No. S-446 S/O Haji Abdul Hameed Khan	07-01-2004	SPO (BPS-16)	Punjab Police	Motorway
100	Abdul Ghaffar No. S-449 S/O Rai Manzoor Ahmed	28-01-2004	SPO (BPS-16)	Punjab Police	Motorway
101	Ashiq Hussain No. S-451 S/O Ghulam Sarwar	03-04-2004	SPO (BPS-16)	Balochistan Police	N-5 Central
102	Khalid Hameed No. S-474 S/O Abdul Hameed	04/03/2005	SPO (BPS-16)	Sindh Police	N-5 South
103	Muhammad Ali No. S-475 S/O Qasim Ali	09-03-2005	SPO (BPS-16)	Balochistan Police	N-5 South
104	Adnan ul Haq No. S-482 S/O Ehsan ul Haq	15-07-2005	SPO (BPS-16)	Sindh Police	N-5 South
105	Najaf Ali No. S-392 S/O Noor Muhammad	18-04-2001	PO (BPS-14)	Balochistan Police	Motorway
106	M. Amir No. S-181 S/O Muhammad Inayat	18-04-2001	PO (BPS-14)	Islamabad Police	Motorway
107	Nadeem Tahir No. S-406 S/O Abdul Rashid	18-04-2001	PO (BPS-14)	Balochistan Police	Motorway

	Fazl Muhammad Fayyaz No. S-497 S/O Haji Hafiz Fatch Muhammad	18-04-2001	PO (BPS-14)	Islamabad Police	Motorway
109.	Imtiaz Ahmad Abbasi No. S-498 S/O Muhammad Riaz	18-04-2001	PO (BPS-14)	Islamabad Police	N-5 North
110.	Zaboor Ahmed No. S-384 S/O M. Tufail	18-04-2001	PO (BPS-14)	Islamabad Police	PC HQ
111.	Mehmood-Ur-Rehman No. S-412 S/O Hase Nawaz	18-04-2001	PO (BPS-14)	Balochistan Police	PC HQ
112.	Shahid Ali No. S-416 S/O Altaf Hussain	18-04-2001	PO (BPS-14)	Balochistan Police	N-5 Central
113.	Mansoor Ahmad Bogio No. S-415 S/O Arbab Ali	18-04-2001	PO (BPS-14)	Islamabad Police	N-5 South
114.	Munir Ahmad No. S-437 S/O Muhammad Yasin	18-04-2001	PO (BPS-14)	Islamabad Police	N-5 Central
115.	Inayat Ullah No. S-372 S/O Fazaal Hussain	18-04-2001	PO (BPS-14)	Islamabad Police	Motorway
116.	Irfan Akber No. S-467 S/O Haji Akber Khan	28-11-2001	PO (BPS-14)	Punjab Police	Motorway
117.	Nasrullah Khan No. S-395 S/O Gulzar Hussain	28-11-2001	PO (BPS-14)	Punjab Police	Motorway
118.	M. Shahbaz No. S-397 S/O Falak Sher Khan	28-11-2001	PO (BPS-14)	Punjab Police	Trg. College
119.	Abdul Hamid No. S-410 S/O Moidi Allah Bux	28-11-2001	PO (BPS-14)	Punjab Police	Motorway
120.	Bashir Ali No. S-422 S/O Muhammad Latif	28-11-2001	PO (BPS-14)	Punjab Police	N-5 North
121.	Naveed Aslam No. S-376 S/O Muhammad Aslam	28-11-2001	PO (BPS-14)	Punjab Police	N-5 North
122.	M. Imran Qureshi No. S-414 S/O Abdul Wahid	28-11-2001	PO (BPS-14)	Punjab Police	West zone
123.	SALAH UD DIN No. S-398 S/O Allah Ditta	28-11-2001	PO (BPS-14)	Punjab Police	West Zone
124.	M. Umar Talib No. S-438 S/O Talib Hussain	28-11-2001	PO (BPS-14)	Punjab Police	West zone
125.	Ghulam Subhan No. S-439 S/O Nazam Moid	28-11-2001	PO (BPS-14)	Punjab Police	West zone
126.	Nasir Mehmood No. S-425 S/O M. Jabal	28-11-2001	PO (BPS-14)	Punjab Police	N-5 North
127.	M. Nawaz No. S-391 S/O Sikandar Khan	28-11-2001	PO (BPS-14)	Punjab Police	Motorway
128.	Tahir Hussain No. S-405 S/O M. Murad	28-11-2001	PO (BPS-14)	Punjab Police	West zone
129.	Razi Ahmed Khan No. S-404 S/O Zahoor ud Din	28-11-2001	PO (BPS-14)	Punjab Police	West zone
130.	M. Aamir Shah No. S-403 S/O M. Yousaf	28-11-2001	PO (BPS-14)	Punjab Police	West zone
131.	Ghulam Yaseen No. S-423 S/O Hafiz M. Saeed	28-11-2001	PO (BPS-14)	Punjab Police	N-5 North
132.	Khaleem Hussain No. S-383 S/O Mukhtar Ahmed	28-11-2001	PO (BPS-14)	Punjab Police	N-5 North
133.	M. Irfan Mughal No. S-386 S/O Mirza M. Idress	10-01-2002	PO (BPS-14)	Sindh Police	N-5 Central
134.	Muhammad Ishaq No. S-441 S/O Fakhar-ud-Din	10-01-2002	PO (BPS-14)	Sindh Police	N-5 Central
135.	Mojeed Ahmad No. S-468 S/O Najeeb Khan	11-11-2002	PO (BPS-14)	Islamabad Police	N-5 North
136.	Muneed Hussain No. S-472 S/O Talib Hussain	13-11-2002	PO (BPS-14)	Sindh Police	Motorway
137.	Tufail Raza Mazari No. S-413 S/O Qalandar Bux Mazari	13-11-2002	PO (BPS-14)	Sindh Police	N-5 South

138	Sajid Mehmood No. S-373 S/O Talib Hussain	08-01-2003	PO (BPS-14)	Punjab Police	N-3 North
139	Naveed Ahmed No. S-418 S/O Aziz Ahmed	08-01-2003	PO (BPS-14)	Punjab Police	N-4
140	Muhammad Javed No. S-390 S/O Bashir Ahmed	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
141	Malik Qadir No. S-393 S/O Qadir Masih	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
142	Zarar Ahmed Khan No. S-440 S/O Atta Ullah Khan	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
[REDACTED SECTION]					
143	Rizwan Aslam No. S-369 S/O Muhammad Aslam	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
144	Anwar Ali No. S-375 S/O Abdul Qayyum	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
145	Shahid Abbas Gillani No. S-464 S/O Ghulam Shabir	08-01-2003	PO (BPS-14)	Punjab Police	N-5 South
146	Sajjad Ahmed No. S-428 S/O Mehmood Khan	08-01-2003	PO (BPS-14)	Punjab Police	N-5 North
147	Abdul Majid No. S-387 S/O Muhammad Tahir	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
148	Ghulam Rasool No. S-380 S/O Alam Khan	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
149	Amir Shahzad No. S-433 S/O M. Yaqoob	08-01-2003	PO (BPS-14)	Punjab Police	N-5 Central
150	Nasir Aziz No. S-432 S/O Ashraf Rashid Niaz	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
151	Rafiq Hussain No. S-368 S/O Ameer Shah	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
152	Nasir Mehmood No. S-378 S/O Abdul Qayyum	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
153	Urfan Bashir No. S-371 S/O Bashir Ahmed	08-01-2003	PO (BPS-14)	Punjab Police	Motorway
154	Rafiq Hussain No. S-417 S/O Ibrar Hussain	08-01-2003	PO (BPS-14)	Punjab Police	N-5 Central
155	M. Iqbal Shah, No. S-433 S/O Syed Muhammad Hussain	08-01-2003	PO (BPS-14)	Punjab Police	N-5 Central
156	M. Zafar Iqbal No. S-436 S/O M. Yousof	23-06-2003	PO (BPS-14)	Punjab Police	N-5 Central
157	Muhammad Rameez No. S-466 S/O Karim Hus	01-11-2003	PO (BPS-14)	Sindh Police	Motorway
158	Saleem Zia No. S-448 S/O Haji Abdul Razzaq	20-03-2004	PO (BPS-14)	Punjab Police	N-5 Central
159	Akhtar Iqbal No. S-447 S/O Mrida Shabzid Gul	23-03-2004	PO (BPS-14)	Balochistan Police	N-5 North
160	Mehmood Ali Kokhar No. S-242 S/O Bashir Ahmed	30-03-2004	PO (BPS-14)	Balochistan Police	PLHQ
161	Raja Kamal Hayat No. S-469 S/O Raja Liaqat Hayat	07-06-2004	PO (BPS-14)	Punjab Police	N-5 Central
162	Amjad Ahsan No. S-453 S/O Muhammad Sadique	07-06-2004	PO (BPS-14)	Punjab Police	Motorway
163	Ghulam Rasool No. S-432 S/O Fazal Din	07-06-2004	PO (BPS-14)	Punjab Police	Trg. College
164	Mazhar ul Haq No. S-455 S/O Fazal Hussain	13-12-2004	PO (BPS-14)	Punjab Police	N-5 North
165	M. Iqbal No. S-456 S/O Ch. Manga Khan	13-12-2004	PO (BPS-14)	Punjab Police	PLHQ

169	Muhammad Abbas No S-480 S/O Manzoor Hussain	13-12-2004	PO (BPS-14)	Punjab Police	N-5 Central
170	Muhammad Karim No S-478 S/O Karam Din	25-01-2005	PO (BPS-14)	Punjab Police	Muzoreby
171	Muhammad Yousof No S-457 S/O Mian Ahmed	14-02-2005	PO (BPS-14)	Punjab Police	Muzoreby
172	Malik Khalid Hussain, No. S-1119 S/O Malik Allah Dilta	15-07-2005	PO (BPS-14)	Sindh Police	N-5 North
173	Qasem ud Din No. S-1120 S/O Qamar ud Din	15-07-2005	PO (BPS-14)	Sindh Police	N-5 South
174	Muhammad Najeed No. P-677 S/O Ghulam Muhammad	02-11-2005	PO (BPS-14)	Islamabad Police	N-5 North

- These officers shall be treated on deputation on standard terms and conditions set out at Sl. 30 of Esta Code Volume-1, the Establishment Division Office Memorandum No 1/13/87-R-1, dated 03-12-1990. Consequently, the Notification No 47(4)/17/HRM/SPO/1223 dated 22-05-2018, Notification No. 47(4)/17/HRM/SPO/2728 dated 13-12-2018 and Notification No 47(4)/17/HRM/SPO/ 72 dated 09-01-2019 regarding grant of LPR to the officers mentioned at serial No. 2, 4 & 116 respectively are also hereby cancelled/withdrawn.
- The concerned Zonal Commanders are requested that all the relevant entries made in the Service Rolls/Books/Record/Pay Slips etc of the above named officers shall accordingly be updated, under intimation to this office.
- This issues with the approval of Inspector General of Police, NH&MP in partial modification / supersession of any other order / notification contrary to this notification.

(SYED HASHMAT KAMAL) PSP
Assistant Inspector General (HRM)
for Inspector General, NH&MP

The Manager
Printing Corporation of Pakistan Press,
University Road, Karachi-V

- Copies to:-
- IsGP/Provincial Police Officers, Islamabad, Lahore, Peshawar, Karachi, Quetta.
 - All DSI/AsIG, NHMP. With the request to direct the officers mentioned at Serial No. 2, 4 & 116 to re-join the duty immediately
 - All AIsG, NHMP, Islamabad,
 - DSP/CPO (Legal), NHMP, Islamabad.
 - Accounts Officers, AGPR, Islamabad/ Sub Offices, Lahore, Karachi, Quetta & Peshawar.
 - DDOs/ Accountants, concerned Zones.
 - Computer Programmer, C.B, NHMP, Islamabad.
 - Computer Operator (HRM Branch).
 - Master File

2
(SYED HASHMAT KAMAL) PSP
Assistant Inspector General (HRM)
for Inspector General, NH&MP



(21)

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

No. CPO/CPB/ 258

Dated Peshawar 30/09 /2020

To: The Regional Police Officer,
Mardan Region, Mardan.

Subject: REPRESENTATION FOR SENIORITY

Memo: [Redacted]
above refer Memo dated 19/09/2020 on the subject noted.

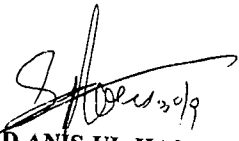
Application of Sub Inspector Jahan Bahadar No. 28/MR of your Region was sent to AIG/Legal CPO Peshawar for opinion. The opinion of AIG/Legal CPO is as under:-

According to ESTA CODE (Establishment Code Khyber Pakhtunkhwa)

Sl. No.4 - Policy governing Civil Servants on deputation basis.

"Government may allow an officer to continue against his assignment abroad even after the expiry of 05 years on the request of the officer or his employer. However in all such cases, the officer's name will be removed from the existing seniority list and placed on a separate static list with no claim to promotion or to seniority over any junior who may be promoted during this period. An officer's name would be brought back on the seniority list only after he resumes duty on return. In such cases also the officer must earn a confidential report for one full year before he is considered for promotion. If approved for promotion, he will not regain his seniority. He will be assigned seniority in the higher post only from the date he assumes its charge". The rule of Esta Code is clear, may followed please.

The applicant may be informed accordingly.


(SYED ANIS-UL-HASSAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Ec
For inspection

\$ Investigation
25/10/20 chd

The officers/officials who have been repatriated to their Parent departments shall be entitled to salaries and other benefits from the date they were relieved to join their Parent departments. Their seniority shall be maintained.

as if they were never relieved from their Parent departments. Expiry of Period of Lien shall not come in the way of the officers to deprive them from joining the Parent department.

سین 20 اگست 1998 کو KP پولیس میں بطور سپرنٹنڈنٹ مقرر ہوئے۔
آرڈر میں پیرشیا علی شاہ سے پہلے بڑا درجہ ریاض (موسم) سے بعد کے
بیمار سائٹی جو درجہ پولیس سے پنجاب سندھ اسلام آباد پولیس میں والی
جائے ہیں۔ انڈوسٹریل کورٹ آف پاکستان کے منیجمنٹ سٹریٹجی ڈیپارٹمنٹ
مزدور درخواست پڑا سندھ عاصیہ سریم کورٹ آف پاکستان کے منیجمنٹ
کے مطابق مذکورہ کو ایسا سٹیشن دیکر نام پر رجسٹریشن لٹری میں SP پیرشیا علی شاہ
کے بعد کے الا جائے۔

04/08/2020

مذکورہ احکامات دعاؤں سے
کوٹ جملہ کاغذات و آرڈر ریز رجسٹریشن

العاصیہ
SI خان بیادر MR-28 انٹیلیجنس ونگ حارسہ
فون نمبر: 5673002-0300

BEFORE THE HONOURABLE KPK SERVICES TRIBUNAL PESHAWAR

Service Appeal No. 14056/2020

Jan Bahadur S.I MR-28
Investigation Wing Charsadda.

.....Appellant

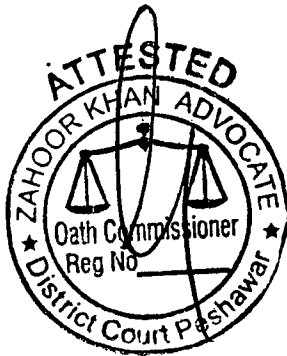
V E R S U S

The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar & others

.....Respondents

AFFIDAVIT

I, Shah Jehan, ASI (representative of the department) do hereby solemnly affirm and declare on Oath that contents of the parawise comments are true and nothing has been concealed from this Hon'ble Tribunal.



10 JUN 2021

Shah

DEPONENT:

CNIC No.17101-9377155-1

Cell # 0310-9898096