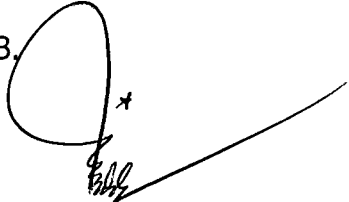


17.08.2022

Mr. Arbab Saiful Kamal, Advocate for the appellant present.  
Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr.  
Wisal Khan, Naib Court for official respondents No. 1 & 2 present.  
Nemo for private respondents No. 3 to 79.

As per previous order sheets dated 17.06.2022 and 27.07.2022, the expenses required on account of TCS service have not been deposited. Contention of the learned counsel for appellant is that the appellant has already deposited process fee in the Service Tribunal, it is therefore, an conditional liability and burden on the appellant. Being an administrative issue falling not in the judicial ambit of the Bench at this stage, The case is submitted for appropriate orders of the Hon'ble Chairman. Adjourned. To come up for reply/comments on 10.10.2022 before S.B.


*The issue was placed before the Registrar for further directions on 29/09/2022*

  
(Mian Muhammad)  
Member (E)

10.10.2022

Counsel for the appellant present. Mr. Kabir Ullah Khattak,  
Additional Advocate General for respondents present.

On the previous date office was directed to place the file before Hon'ble Chairman, but today he is busy in other Bench. Therefore, the case is adjourned to 13.10.2022 before S.B of Hon'ble Chairman.

  
(Fareeha Paul)  
Member (E)

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

5725  
S.A. No. \_\_\_\_\_ /2021

Israr Ali

versus

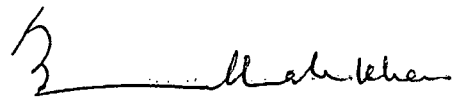
PPO &amp; Others

**I N D E X**

S. No.	Documents	Annex	P. No.
1.	Memo of Appeal		1-10
2.	Seniority List dated 31-12-2011	"A"	11-14
3.	Seniority List dated 31-12-2013	"B"	15-22
4.	Seniority List dated 01-06-2015	"C"	23-26
5.	Representation dated 07-07-2015	"D"	27-28
6.	Seniority List dated 31-12-2017	"E"	29-34
7.	Representation dated 11-05-2018	"F"	35-37
8.	Seniority List dated 30-06-2020	"G"	38-42
9.	Representation dated 17-11-2020	"H"	43-45

Appellant

Through



Saadullah Khan Marwat  
Advocate.

21-A, Nasir Mansion,  
Shoba Bazaar, Peshawar  
Ph: 0311-9266609

Dated: 19-03-2021

**BEFORE KPK SERVICE TRIBUNAL PESHAWAR**

S.A No. \_\_\_\_\_/2021

Israr Ali S/O Sahibzada,  
Senior Clerk, Office of  
DIG Telecommunication,  
KP, Peshawar . . . . . Appellant

Versus

1. **Provincial Police Officer,**  
KP, Peshawar.
2. **Deputy Inspector General**  
Of Police, Hqr: KP, Peshawar.
3. Muhammad Shafiq,  
Asst: Grade Clerk,  
Office of SP FRP,  
Bannu Range Bannu.
4. Gul Said, Senior Clerk,  
Office of DPO Karak.
5. Akhtar Hussain-I,  
Asst: Grade Clerk,  
RPO Office, D. I. Khan.
6. Farmanullah, Asst: Grade  
Clerk, Central Police Office,  
KP, Peshawar.
7. Abdul Karim, Asst: Grade Clerk,  
Office of AIG, Bomb Disposable  
Unit, Peshawar.

8. Ibrar Hussain, Senior Clerk,  
Capital City Police Office,  
Peshawar.
9. Sharafatullah, Senior Clerk,  
Investigation Unit, Central  
Police Office, KP, Peshawar.
10. Gohar Ali, Asst: Grade Clerk,  
DPO Office Mardan.
11. Shoaib, Asst: Grade Clerk,  
Central Police Office,  
KP, Peshawar.
12. Muhammad Abid-1,  
Senior Clerk, FRP Office,  
Kohat Range Kohat.
13. Muhammad Bilal-1,  
Asst: Grade Clerk, Office of  
Regional Police Officer, Kohat.
14. Ghaffar Ali, Asst: Grade Clerk,  
RPO Office Kohat.
15. Imad Hussain Shah,  
Senior Clerk, Central Police Office,  
KP, Peshawar.
16. Muhammad Saeed,  
Asst: Grade Clerk,  
RPO Office Mardan.
17. Hussain Habib, Asst: Grade Clerk,  
Office of Commandant Elite, KP,  
Peshawar.

- 3
18. Muhammad Farman Ali,  
Asst: Grade Clerk,  
Office of FRP Hqr: Peshawar.
  19. Fazal Khaliq, Asst: Grade Clerk,  
Office of SP Investigation Chitral.
  20. Ajmal Khan, Senior Clerk,  
Capital City Police Office,  
Peshawar.
  21. Shah Zaman-1, Asst: Grade Clerk,  
RPO Office Kohat.
  22. Muhammad Younis, Senior Clerk,  
DPO Office, Lakki Marwat.
  23. Zakria Khan, Senior Clerk,  
DPO Office, Nowshera.
  24. Akhtar Hussain-II, Asst: Grade Clerk,  
DPO Office Lower Chitral.
  25. Raj Malook, Senior Clerk,  
DPO Office, Bunir.
  26. Noor-ul-Arifeen, Senior Clerk,  
DPO Office Bunir.
  27. Ijaz Khan, Asst: Grade Clerk,  
DPO Office District Battagram.
  28. Esa Khan, Asst: Grade Clerk,  
DPO Office Dir Lower.
  29. Gul Karim, Senior Clerk;  
Central Police Office, KP,  
Peshawar.

30. Shahid Mehmood, Senior Clerk,  
Office of RPO Kohat Range Kohat.
31. Dost Muhammad, Senior Clerk,  
In the office of Regional Police  
Officer, Kohat Range.
32. Ikram-Ul-Haq, Senior Clerk,  
NACTA Islamabad (on deputation).
33. Shah Iran, Asst: Grade Clerk,  
Central Police Office, KP, Peshawar.
34. Rashid Mehmood, Senior Clerk,  
Capital City Police Office Peshawar.
35. Badshah Din, Senior Clerk,  
Office of District Police Officer,  
Hangu.
36. Sherin Badshah, Senior Clerk,  
Office of SP Investigation,  
Bannu.
37. Mir Muhammad, Senior Clerk,  
Office of the Regional Police Officer,  
Bannu.
38. Javed Khan-1, Office of the  
District Police Officer, Mardan.
39. Arshad, Senior Clerk, Office of RFSL,  
Swat.
40. Saifullah Khan, Senior Clerk,  
Office of SP Investigation,  
Lakki Marwat.

41. Hakim Khan, Senior Clerk,  
Office of District Police Officer,  
Tank.
42. Khan Bahadar, Senior Clerk,  
Office of SP Investigation,  
Karak.
43. Abdul Malik, Senior Clerk,  
Office of District Police Officer, Bannu.
44. Muhammad Anees, Senior Clerk,  
Office of Capital City Police Officer,  
Peshawar.
45. Fazle Khuda, Senior Clerk,  
Office of Capital City Police,  
Peshawar.
46. Sakhi Muhammad, Senior Clerk,  
Office of Elite Force, Lakki Marwat.
47. Javed Khan-II, Senior Clerk, Peshawar.
48. Mohammad Shoaib, Senior Clerk,  
Office of SSP Traffic,  
Peshawar.
49. Sher Nawaz, Senior Clerk,  
DPO Office District Battagram.
50. Rahim Dad, Senior Clerk,  
Office of SP Investigation,  
Battagram.
51. Muhammad Nawab, Senior Clerk,  
DPO Office Swat.

52. Shah Faisal, Senior Clerk,  
Office of Regional Police  
Officer, Mardan.
53. Ghulam Muhammad,  
Senior Clerk, Capital City  
Police Office, Peshawar.
54. Fazle Maula, Senior Clerk,  
Office of the Capital City Police,  
Peshawar.
55. Noor Ul Islam, Senior Clerk,  
DPO Office District Battagram.
56. Tassarwar Hussain, Senior Clerk,  
Office of the SSP Traffic,  
Peshawar.
57. Syed Abdul Hameed, Senior Clerk,  
Office of the Police Training School,  
Swabi.
58. Muhammad Ashfaq, Senior Clerk,  
Office of the District Police Officer,  
Abbottabad.
59. Gujar Khan, Senior Clerk,  
Central Police Office, KP,  
Peshawar.
60. Haroon Rashid, Senior Clerk,  
Office of the Capital City Police Officer,  
Peshawar.
61. Saif Ur Rehman, Senior Clerk,  
Office of the DIG Traffic,  
Peshawar.



62. Jamal Shah, Senior Clerk,  
Office of RPO, Malakand  
At Swat.
63. Qabool Jan, Senior Clerk,  
Office of the Investigation  
Central Police Office, Peshawar.
64. Samin Jan, Senior Clerk,  
Office of the District Police Officer,  
Charsadda.
65. Kifayatullah, Senior Clerk,  
Office of the Elite Force,  
KP, Peshawar.
66. Parisan Khan, Senior Clerk,  
Office of the District Police Officer,  
Charsadda.
67. Shah Faisal, Senior Clerk,  
DPO Office, District Shangla.
68. Hamidullah, Senior Clerk,  
DPO Office, District Shangla.
69. Abdur Rehman, Senior Clerk,  
Office of the Capital City Police  
Officer, Peshawar.
70. Abdul Waheed, Senior Clerk,  
Office of the District Police Officer,  
Mardan.
71. Muhammad Ajmal, Senior Clerk,  
Office of the Central Police Office,  
KP, Peshawar.

72. Inayat Ur Rehman, Senior Clerk,  
Police Training School, Swabi.
73. Gul Akbar, Senior Clerk,  
Central Police Office, KP, Peshawar.
74. Dil Jan, Senior Clerk,  
DPO Office, District Lakki.
75. Tehseenullah-I, Senior Clerk,  
Office of the District Police Officer,  
Charsadda.
76. Said Ghulam, Senior Clerk,  
DPO Office District D.I Khan.
77. Muhammad Anwar, Senior Clerk,  
DPO Office District Lakki Marwat.
78. Mukhtiar Khan, Senior Clerk,  
Office of DPO District Tank.
79. Muhammad Altaf, Senior Clerk,  
Office of DPO; District Kohat . . . . . Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974**  
**AGAINST REVISED SENIORITY LIST OF SENIOR**  
**CLERKS STOOD ON 30-06-2020 OF R. NO. 01**  
**CIRCULATED ON 21-10-2020 WHEREBY APPELLANT**  
**BEING MOST SENIOR WAS NOT PLACED AT PROPER**  
**PLACE AND DEPARTMENTAL APPEAL DATED 17/20-**  
**11-2020 WAS NOT HONORED:**

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**Respectfully Sheweth:**

1. That appellant was initially appointed as Junior Clerk on 29-12-1999 and was promoted to the post of Senior Clerk on 02-12-2009.

2. That on 31-12-2011, R. No. 01 circulated Seniority List of Senior Clerks whereby name of appellant was placed at S. No. 291 and this seniority list was quite per the mandate of law. (Copy as annex "A")
3. That on 31-12-2013, subsequent seniority list was circulated by the said authority, wherein appellant was placed at S. No. 205 and an incumbent at S. No. 10 was assigned revised seniority list but before the column, the same was written as 11-12-2012. Similarly incumbent at S. No. 45, 50, 88, 133, 140, 150, 154, 155, 161, 184, 203 were treated alike. (Copy as annex "B")
4. That on 01-06-2015, another seniority list of Senior Clerks was circulated and the aforesaid incumbents was assigned the aforesaid positions. This seniority list was circulated amongst the concerned, so on 07-07-2015, appellant submitted representation before the authority to place him at proper place which was forwarded vide covering letter of the same date but without any response. (Copies as annex "C" & "D")
5. That on 31-12-2017, another seniority list was circulated vide covering letter dated 09-04-2018 with the aforesaid positions which was objected by the appellant vide letter dated 11-05-2018 but in vain. (Copies as annex "E" & "F")
6. That finally on 30-06-2020, revised seniority list of Senior Clerks B-14 was uploaded on website with the aforesaid positions which was again represented vide application dated 17-11-2020 with covering letter dated 20-11-2020 wherein appellant was placed at S. No. 154 and the aforesaid juniors were placed above his name but the same also met dead response till date. (Copies as annex "G" & "H")

Hence this appeal, inter alia, on the following grounds:

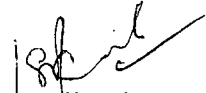
**GROUND S:**

- a. That appellant was initially appointed on 29-12-1999 as Junior Clerk and was promoted to the post of Senior Clerk on 02-12-2009.
- b. That private respondents were appointed prior, however they were promoted to the post of Senior Clerks in the year 2012, 2013,

2015, 2019, etc, so they became junior to appellant in cadre, grade and post.


- c. That seniority is to be reckoned from grade to grade, post to post and cadre to cadre, so it is crystal clear that appellant was promoted to the post of Senior Clerk on 02-12-2009, while the contesting respondents in the year 2012, 2013, 2015 and 2019.
- d. That every seniority list gives fresh cause of action to an aggrieved person and it is to state that earlier seniority lists were not circulated amongst the incumbents.
- e. That as and when seniority position is required to change, then the position will be brought up into the notice of the changed positions but in the case, no notice was given to appellant, so the said seniority lists have no binding effect upon the position of appellant.
- f. That even in all the seniority lists, it was admitted by the authority that they were given revised seniority but appellant was never associated with the same and the change was made in the office of the official respondents for ulterior motive.
- g. That the change was made with consideration basis, so is not per the mandate of law.

It is, therefore, most humbly prayed that on acceptance of the appeal, seniority list dated 21-10-2020 stood on 30-06-2020 be set aside and seniority list of 31-12-2011 be restored as such and the name of appellant be placed at proper place above the names of private respondents in the said Seniority List dated 30-06-2020, or as the case may be, with all service benefits and relief.

  
Appellant

Through

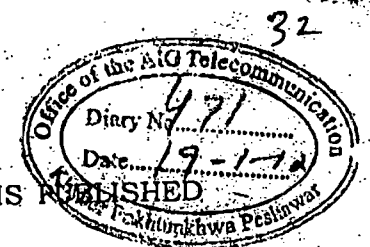
  
Saadullah Khan Marwat

  
Arbab Saiful Kamal

  
Amjad Nawaz  
Advocates.

Dated 19-03-2021

TCL



**SENIORITY LIST OF SENIOR CLERKS AS IT STOOD ON 31-12-2011**

NO. 919 /E-III, THE SENIORITY LIST OF SENIOR CLERKS: - THE SENIORITY LIST OF SENIOR CLERKS IS PUBLISHED FOR INFORMATION OF ALL CONCERNED.

S.No.	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enlis:	DATE OF PROMOTION AS S. Clerk	DATE OF PROMOTION AS SELECTION GRADE	REMARKS
1 ✓	Javed Iqbal	Peshawar	10 <sup>th</sup>	20.02.52	19.02.74	09.08.81	01.12.90	In 2009 DPC meeting he was superseded because he has forgone his promotion for ever.
2 ✓	Abdul Hafiz	Peshawar	10 <sup>th</sup>	01.01.53	04.04.75	05.01.84	01.12.90	
3	Khair Muhammad	Bannu	10 <sup>th</sup>	09.11.54	05.02.76	04.12.86	01.02.92	Promotion foregone for ever vide DIG/Bannu letter No. 2643/ES dated: 28.09.98.
4 ✓	Hastam Khan	Peshawar	10 <sup>th</sup>	24.03.60	25.9.78	5.9.88	16.197	
5	Aziz Ullah	Bannu	10 <sup>th</sup>	01.10.57	19.5.80	6.12.88	5.8.98	
6	Qamar Zaman	Bannu	BA	05.02.56	30.9.80	27.3.90	25.2.2000	
7	Akbar Ali	Swat	10 <sup>th</sup>	9.2.63	17.1.63	17.7.90	22.1.2001	
8	Aftab-ud-Din	Mardan	FA	20.4.56	3.2.82	17.7.90	2.2.2001	
9	Bakhat Afsar	Swat	10 <sup>th</sup>	1.2.58	20.4.81	16.2.91		
10 ✓	Gul Faraz	Mardan	10 <sup>th</sup>	4.10.54	7.4.76	11.7.91		
11 ✓	Jehangir Khan	A. Abad.	10 <sup>th</sup>	15.4.62	1.1.78 Chowkidar 5.8.80 JC	11.7.91		Superseded in DPC 2009
12	Abdul Ahad	Chitral	BA	2.4.59	1.9.78	12.8.91		
13	Muzafar Iqbal	Peshawar	10 <sup>th</sup>	16.02.60	01.08.74 FC	15.10.91		re-instate in service 31.12.2009

*[Handwritten signature]*

A M

L.No.	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enls:	DATE OF PROMOTION AS S. Clerk	DATE OF PROMOTION AS SELECTION GRADE	REMARKS
271.	Murad Ali	Malakand Agency	10th	02.03.73	11.12.94	02.12.2009		
272.	Muhammad Tufail	Charsadda	FA	03.01.75	10.01.95	02.12.2009		
273.	Murad Ali	Malakand Agency	10th	17.04.71	20.04.95	02.12.2009		
274.	Majeedullah	Malakand Agency	BA	10.01.1976	27.04.95	02.12.2009		
275.	Muhammad Safdar	Swabi	BA	05.04.73	08.05.95	02.12.2009		
276.	Muhammad Qaseem	Peshawar	C.Com	01.04.77	25.05.95	02.12.2009		
277.	Siraj ul Haq	Peshawar	MA	09.04.73	04.06.95	02.12.2009		
278.	Hidayatullah	Charsadda	FA	10.04.68	18.06.95	02.12.2009		
279.	Javed Ali	Charsadda	FA	03.08.69	20.06.95	02.12.2009		
280.	Farhatullah	Peshawar	FA	15.09.74	19.07.95	02.12.2009		
281.	Umar Gul	Peshawar	D.Com	01.05.69	13.09.95	02.12.2009		
282.	Muhammad Saleem	DIKhan	B.A/LLB	15.09.69	10.10.95	02.12.2009		
283.	Maqsood ur Rehman	Peshawar	10th	05.06.72	12.11.95	02.12.2009		
284.	Zafar Abbas	DIKhan	10th	01.09.77	19.11.95	02.12.2009		
285.	Mehrab Hayat	Chitral	10th	10.11.73	22.05.96	02.12.2009		
286.	Muhammad Mushtaq	DIKhan	FA	27.06.68	13.02.95 FC 01.06.96 JC	02.12.2009		
287.	Ghulam Mustafa	Peshawar	10th	15.01.77	19.11.96	02.12.2009		
288.	Muhammad Arshad	Lakki Marwat	B.A	18.12.80	28.12.99 ✓	02.12.2009		
289.	Javed Iqbal	Kohat	BA	15.02.71	28.12.99 ✓	02.12.2009		
290.	Muhammad Ibrahim Shah	Lakki	BA	16.07.75	29.12.99 ✓	02.12.2009		
291.	Israr Ali	Peshawar	BA	15.04.78	29.12.99 ✓	02.12.2009		✓

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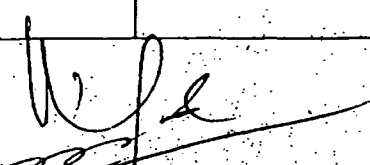
12

S.No.	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enlis:	DATE OF PROMOTION AS S. Clerk	DATE OF PROMOTION AS SELECTION GRADE	REMARKS
292.	Saif ur Rehman	Peshawar	B.Sc	15.04.73	30.12.99	02.12.2009		
293.	Ikram Ullah	Peshawar	D.Com	09.04.76	30.12.99	02.12.2009		
294.	Sarfraz Khan	Malakand	10th	15.04.67	30.12.99 absorb as a J/c	02.12.2009		
295.	Faisal Qamar	Peshawar	BA	02.02.77	30.12.99	02.12.2009		
296.	Rifaqat Ali	Peshawar	FA	28.02.80	31.12.99	02.12.2009		
297.	Muhammad Afzal	Abbottabad	FA	01.01.72	01.01.2000	02.12.2009		
298.	Muhammad Abid	DIKhan	BA	10.03.71	03.01.2000	02.12.2009		
299.	Haqiqul Isalm	Peshawar	MA	01.03.74	04.01.2000	02.12.2009		
300.	Faqir Muhammad	Malakand Agency	FA	01.01.75	05.01.2000	02.12.2009		
301.	Faheem Ullah	DIKhan	10th	26.07.78	05.01.2000	02.12.2009		
302.	Ghufarn ud Din	Chitral	D.Com	06.07.74	06.01.2000	02.12.2009		
303.	Hassan Mehmood	Hangu	BA	26.02.75	06.01.2000	02.12.2009		
304.	Moin Nawaz	DIKhan	C.Com	25.03.80	06.01.2000	02.12.2009		
305.	Hidayat Ullah	Chitral	10th	02.02.72	06.01.2000	02.12.2009		
306.	Fayaz Ali	Charsadda	BSc	03.11.74	11.01.2000	02.12.2009		
307.	Ishfaq Jan	Charsadda	BA	03.09.70	12.01.2000	02.12.2009		
308.	Mirza Rehmat	Chitral	B.Com	01.01.71	17.01.2000	02.12.2009		
309.	Muhammad Zia ul Haq	Peshawar	D.Com	25.05.80	29.02.2000	02.12.2009		
310.	Miraj Hussain	Chitral	D.Com	23.08.75	24.03.2000	02.12.2009		
311.	Jehanzeb	Charsadda	FA	13.03.70	21.08.2000	02.12.2009		
312.	Ijaz Ahmad	Peshawar	FA	16.02.69	10.02.91 as a Daftar 05.10.2001 JC	02.12.2009		

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S.No.	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enls:	DATE OF PROMOTION AS S. Clerk	DATE OF PROMOTION AS SELECTION GRADE	REMARKS
313.	Yasir Iqbal	Nowshera	10th	06.01.79	25.01.99 as daftari 05.10.2001 as a J/C	02.12.2009		
314.	Muhammad Irshad	Peshawar	FA	15.07.1979	16.07.98 as N/Qasid 06.10.2001 as a J/C	02.12.2009		
315.	Murad Ali	Charsadda	10th	15.02.75	10.02.96 as a C/VI 08.10.2001 as a J/C	02.12.2009		
316.	Muhammad Rehan	DIKhan	BA	01.04.75	05.04.93 as a N/Qasid 08.10.2001 as J/C	02.12.2009		
317.	Rajab Ali	DIKhan	10th	01.01.76	10.04.96 as a N/Qasid 08.10.2001 as a J/C	02.12.2009		
318.	Muhammad Riaz	Peshawar	BA	15.04.74	25.02.96 as a C/VI 09.02.2001 as J/C	02.12.2009		

  
**(KHALID MASOOD)**  
 Addl: IGP/Headquarters,  
 For Provincial Police Officer,  
 Khyber Pakhtunkhwa  
 Peshawar.

No. 920-40 E/III, dated Peshawar, the 17 / 10 / 2012.

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

1. Addl: IsGP /Investigation & Special Branch, Khyber Pakhtunkhwa
2. Capital City Police Officer Peshawar
3. All Regions: DisG in Khyber Pakhtunkhwa
4. DIG DCT Special Branch, Khyber Pakhtunkhwa, Peshawar
5. Commandants FRP & PTC Hangu,
6. AIG Traffic Khyber Pakhtunkhwa Peshawar
7. Registrar CPO.
8. Supdt: Establishment CPO.
- PA to IGP Khyber Pakhtunkhwa, Peshawar.

They are requested to please inform all officers serving under their command. Any officer who have objection on his seniority, he should submit his representation within one month after the issue of the list otherwise no representation will be accepted.



## SENIORITY LIST OF SENIOR CLERKS AS IT STOOD ON 31.12.2013

NO. 263 /E-V, The seniority list of Senior Clerks: - The seniority list of Senior Clerks is published for information of all concerned.

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
1. ✓	Khair Muhammad	Bannu	10 <sup>th</sup>	09.11.54 ✓	05.02.76	04.12.86	Promotion forgone for ever vide DIG/Bannu letter No. 2643/ES dated 28.09.98
2. ✓	Qamar Zaman	Bannu	BA	05.02.56	30.9.80	27.3.90	
3. ✓	Akbar Ali	Swat	10 <sup>th</sup>	9.2.63	17.1.82	17.7.90	
4. ✓	Bakhat Afsar	Swat	10 <sup>th</sup>	1.2.58	20.4.81	16.2.91	
5.	Gul Faraz	Mardan	10 <sup>th</sup>	4.10.54 ✓	7.4.76	11.7.91	
6. ✓	Muzafar Iqbal	Peshawar	10 <sup>th</sup>	16.02.60	01.08.74 FC 01.05.79 JC	15.10.91	Re-instate in service 31.12.2009
7. ✓	Alam Khan	Swat	BA	2.2.56	1.6.80	01.3.92	
8. ✓	Haibat Khan	Bannu	FA	30.09.63	19.8.82	16.8.92	
9. ✓	Muhammad Yousaf	A. Abad	10 <sup>th</sup>	25.12.62	28.11.83	22.8.93	
10. ✓	Muhammad Saleem ①	Peshawar	10 <sup>th</sup>	10.09.64	08.11.82	11.12.2012	Assigned revised seniority vide Order No. 19192-93/E-III dated: 06-08.2013
11. ✓	Muhammad Sultan	Mansehra	10 <sup>th</sup>	25.5.55 ✓	24.4.77 NQ 14.12.83 JC	22.8.93	
12. ✓	Sana Ullah	Charsadda	BA	11.3.63	18.4.86	25.4.94	
13. ✓	Hidayatullah	Charsadda	F.A	21.10.66	11.01.87	03.01.96	
14. ✓	Zar Badshah	Peshawar	10 <sup>th</sup>	02.11.64	15.02.87	03.01.96	
15. ✓	Muhammad Jamshid	Peshawar	B.A	10.04.61	09.04.86	10.12.96	

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M. A. Khan

EV  
11-3-14

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
35. ✓	Sajjad Hussain	Peshawar	10th	24.04.68	03.02.88	16.01.2008	
36. ✓	Muhammad Zahir	Charsadda	BA	16.05.59	04.02.88	16.01.2008	
37. ✓	Amir ur Rehman	Dir	10th	22.04.65	24.02.88	16.01.2008	
38. ✓	Ubaid ur Rehman-I	Chitral	FA	09.09.67	05.03.88	16.01.2008	
39. ✓	Shah Farooq	Kohat	BA	01.03.67	07.03.88	16.01.2008	
40. ✓	Jalal ud Din	Malakand Agency	10th	21.02.66	21.03.84 FC 24.04.88 JC	16.01.2008	
41. ✓	Ubaid ur Rehman - II	Charsadda	FA	14.09.64	31.03.88	16.01.2008	
42. ✓	Gul Nawaz	Bannu	10th	03.03.70	15.08.88	16.01.2008	
43. ✓	Muhammad Pervez - II	Swat	10th	05.02.66	01.02.87 Daftari 03.09.88 JC	16.01.2008	
44. ✓	Maqbali Khan	Peshawar	FA	03.04.64	07.09.88	16.01.2008	
45. ✓	Ihsanullah (4)	Charsadda	10 <sup>th</sup>	11.05.67	19.09.88	11.12.2012	Assigned revised seniority No. 15592-94/E-III dated
46. ✓	Javed Ali	Charsadda	FA	16.09.68	19.09.88	16.01.2008	
47. ✓	Inamullah	Bannu	FA	12.04.69	25.09.88	16.01.2008	
48. ✓	Abdul Aziz	Swat	10 <sup>th</sup>	10.08.60	01.08.82 Class-IV 01.10.88 JC	16.01.2008	
49. ✓	Muqrab Alam Khan	Mardan	10th	07.10.70	08.10.88	16.01.2008	
50. ✓	Abdur Rauf (5)	Lakki	10 <sup>th</sup>	14.02.70	18.12.88	11.12.2012	Assigned revised seniority Order No. 17297-99/19.07.201
51. ✓	Tahseen Ullah	Charsadda	F.A	10.01.65	03.07.89	16.01.2008	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
70. ✓	Muhammad Yousaf	Peshawar	10th	01.04.61	30.09.87	02.12.2009	
71. ✓	Muhammad Ishtiaq	Abbottabad	10th	12.01.67	06.03.88	05.06.2009	
72. ✓	Sardar Alam	Charsadda	FA	02.10.63	02.05.88	05.06.2009	
73. ✓	Sikandar Khan	Kohat	BA	04.04.64	01.08.88	08.08.2009	
74. ✓	Zahid Ullah	Peshawar	10th	04.03.69	01.08.88	08.08.2009	
75. ✓	Abdul Hakim	Swabi	FA	28.10.63	16.08.88	05.06.2009	
76. ✓	Muhammad Nasir (6)	Kohat	BA	11.11.70	07.12.88	05.06.2009	Assigned revised seniority vld 50/E-III dated: 29.01.2013
77. ✓	Nadeem Ahmad	Mansehra	10th	11.04.71	05.07.89	02.12.2009	
78. ✓	Jehanzeb Haideri	Peshawar	BA	04.06.65	11.10.89	05.06.2009	
79. ✓	Muhammad Riaz	Peshawar	10 <sup>th</sup>	08.09.68	08.08.88	05.06.2009	
80. ✓	Inayat Ullah	Malakand Agency	D.Com	10.04.67	11.10.89	06.05.2009	
81. ✓	Sibghatullah	Bannu	10 <sup>th</sup>	08.05.64	30.10.89	02.12.2009	
82. ✓	Alamzeb	Mansehra	10 <sup>th</sup>	11.09.67	16.01.90	05.06.2009	
83. ✓	Muhammad Bashir	Mansehra	10 <sup>th</sup>	02.01.71	16.06.90	05.06.2009	
84. ✓	Muhammad Irshad	Mansehra	FA	13.04.71	10.07.90	08.08.2009	
85. ✓	Farmaqullah	Peshawar	10 <sup>th</sup>	02.04.66	14.07.90	08.08.2009	
86. ✓	Minhaj ud Din	Peshawar	10 <sup>th</sup>	14.07.67	06.09.88 N/Qasid 14.07.90 J/C	06.05.2009	
87. ✓	Ali Asghar	Nowshera	MA	09.01.70	14.07.90	05.06.2009	
88. ✓	Israr Ali (7)	Peshawar	10 <sup>th</sup>	03.03.72	14.07.90	22.07.2013	Assigned revised senio 29187-88/E-III dated:
89. ✓	Abdul Wadood	Charsadda	10 <sup>th</sup>	19.11.65	15.07.90	05.06.2009	

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S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
129.	Hafeez Ullah	Kohat	10th	10.10.72	21.10.91	08.08.2009	
130.	Hamidullah Jan	Khyber Agency	10th	02.02.68	22.10.91	08.08.2009	
131.	Javed Iqbal	Peshawar	10th	11.04.73	22.10.91	08.08.2009	
132.	Shahid Ali	Peshawar	10th	01.04.72	01.11.91	02.12.2009	
133.	Nadeemullah (9)	Peshawar	C.Com	24.06.70	19.11.91	11.12.2012	Assigned revise seniority with his colleague order No. 5569-71/E-III, dated: 06.03.2
134.	Khaista Gul	Peshawar	10th	09.01.67	02.12.91	08.08.2009	
135.	Sardar Ali	Swat	10th	15.03.71	12.12.91	08.08.2009	
136.	Waheed uz Zamar	Karak	10th	21.02.71	08.02.92	08.08.2009	
137.	Shah Nawaz	Kohat	FA	12.02.69	17.02.92	08.08.2009	
138.	Sahar Gul	Peshawar	10th	12.04.73	24.02.92	08.08.2009	
139.	Umar Zada	Dir	10th	18.05.72	07.03.92	08.08.2009	
140.	Badshah Din (10)	Bannu	F.A	01.04.72	16.03.92	11.12.2012	Assigned revise seniority with his colleague order No. 6560-63/E-III, dated: 18.03
141.	Azim Khan	Peshawar	10th	12.02.65	22.03.92	08.08.2009	
142.	Irfanullah	DIKhan	FA	06.10.70	07.07.92	02.12.2009	
143.	Attaullah	Peshawar	FA	10.04.71	17.08.92	02.12.2009	
144.	Gul Aslam	Lakki Marwat	FA	10.08.66	19.08.92	02.12.2009	
145.	Tahir Javed	Peshawar	BA	12.10.66	19.08.92	02.12.2009	
146.	Azizul Haq	Charsadda	FA	05.03.67	19.08.92	02.12.2009	
147.	Jamil Ahmad	DIKhan	D.Com	25.12.71	19.08.92	02.12.2009	
148.	Yousaf Khan	Peshawar	FA	01.07.69	22.08.92	02.12.2009	

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11-3-14

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
149.	Abdur Rauf	DIKhan	10th	10.02.67	23.08.92	02.12.2009	
150.	Arshad (11)	Swat	F.A	12.02.66	25.08.92	11.12.2012	Assigned revise seniority with his colleague order No. 6902-04/E-III, dated: 21.03.20
151.	Habib ur Rehman	DIKhan	FA	16.04.66	27.08.92	02.12.2009	
152.	Abdul Qayum	DIKhan	D.Com	12.08.69	27.08.92	02.12.2009	
153.	Muhammad Ismail	DIKhan	10th	23.08.74	29.08.92	02.12.2009	
154.	Haibat Khan (12)	Tank	F.A	03.05.69	01.09.92	11.12.2012	Assigned revise seniority with his colleague order No. 6890-92/E-III, dated: 21.03.20
155.	Hakim Khan (13)	Tank	10 <sup>th</sup>	06.02.73	01.09.92	11.12.2012	Assigned revise seniority with his colleague order No. 5553-56/E-III, dated: 06.03.20
156.	Asad Khan	Nowshera	BA	20.08.67	01.10.92	02.12.2009	
157.	Niamatullah	Lakki	FA	04.10.74	06.10.92	02.12.2009	
158.	Muhammad Umar (14)	Dir	10th	15.05.55 ✓	17.10.92	02.12.2009	His previous order vide No. 29614-36/E-III 09.12.2009 shall stand.
159.	Khalid Mehmood	Charsadda	10th	01.07.71	19.10.92	02.12.2009	
160.	Fazal Rahim	Tank	FA	01.05.69	12.11.92	02.12.2009	
161.	Abdul Malik (15)	Tank	F.A	19.04.67	12.11.92	11.12.2012	Assigned revise seniority with his colleague order No. 5557-60/E-III, dated: 06.03.20
162.	Muhammad Shahid	Peshawar	10th	04.04.70	13.12.92	02.12.2009	
163.	Muhammad Zaheer	Abbottabad	10th	07.05.71	28.04.91 FC 23.12.92 JC	02.12.2009	
164.	Mustansar ur Rehman	Peshawar	FA	20.10.70	01.04.93	02.12.2009	
165.	Akhtar Abbas Shah	DIKhan	10th	15.12.71	08.04.93	02.12.2009	
166.	Noor ul Habib	Swabi	BA	12.08.74	20.06.93	02.12.2009	
167.	Muhammad Aslam	Mansehra	B.Sc	20.06.72	19.07.93	02.12.2009	
168.	Ashfaq Ahmad Shah	Peshawar	BA	27.07.73	20.07.93	02.12.2009	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
169.	Muhammad Liaqat	Mansehra	10th	09.03.73	01.04.94	02.12.2009	
170.	Shah Zaman	Kohistan	10th	15.03.73	09.01.94	02.12.2009	
171.	Bakht Zada	Malakand Agency	10th	15.02.71	10.05.94	02.12.2009	
172.	Muhammad Bashir	Mansehra	10th	16.02.72	13.07.94	02.12.2009	
173.	Samiullah	Malakand Agency	D.Com	01.02.69	31.07.94	02.12.2009	
174.	Aftab Nabi	Haripur	10th	15.01.74	21.08.94	02.12.2009	
175.	Hazrat Yousaf	Batagram	FA	01.03.68	23.08.94	02.12.2009	
176.	Zahid Ali	Charsadda	FA	14.07.76	10.10.94	02.12.2009	
177.	Karim Khan	Peshawar	MA	29.03.71	20.11.94	02.12.2009	
178.	Amir Azeem	Peshawar	10th	15.05.73	20.11.94	02.12.2009	
179.	Rab Nawaz	Peshawar	BA	04.03.72	24.11.94	02.12.2009	
180.	Hidayat ur Rehman	Peshawar	MA	12.10.67	29.11.94	02.12.2009	
181.	Shoukat Ali	Peshawar	10th	22.08.67	05.12.94	02.12.2009	
182.	Muhammad Younis	DIKhan	FA	23.04.68	18.05.88 N/Qasid 06.12.94 JC	02.12.2009	
183.	Murad Ali	Malakand Agency	10th	02.03.73	11.12.94	02.12.2009	
184.	Fazle Maula (16)	Peshawar	10 <sup>th</sup>	12.05.75	09.01.95	22.07.2013	Assigned revlse seniority with his coll order No. 28013-14/E-III, dated: 1
185.	Muhammad Tufail	Charsadda	FA	03.01.75	10.01.95	02.12.2009	
186.	Murad Ali	Malakand Agency	10th	17.04.71	20.04.95	02.12.2009	
187.	Majeedullah	Malakand Agency	BA	10.01.1976	27.04.95	02.12.2009	
188.	Muhammad Safdar	Swabi	BA	05.04.73	08.05.95	02.12.2009	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
189.	Muhammad Qaseem	Peshawar	C.Com	01.04.77	25.05.95	02.12.2009	
190.	Siraj ul Haq	Peshawar	MA	09.04.73	04.06.95	02.12.2009	
191.	Hidayatullah	Charsadda	FA	10.04.68	18.06.95	02.12.2009	
192.	Javed Ali	Charsadda	FA	03.08.69	20.06.95	02.12.2009	
193.	Farhatullah	Peshawar	FA	15.09.74	19.07.95	02.12.2009	
194.	Umar Gul	Peshawar	D.Com	01.05.69	13.09.95	02.12.2009	
195.	Muhammad Saleem	DIKhan	B.A/LLB	15.09.69	10.10.95	02.12.2009	
196.	Maqsd ur Rehman	Peshawar	10th	05.06.72	12.11.95	02.12.2009	
197.	Zafar Abbas	DIKhan	10th	01.09.77	19.11.95	02.12.2009	
198.	Mehrab Hayat	Chitral	10th	10.11.73	22.05.96	02.12.2009	
199.	Muhammad Mushtaq	DIKhan	FA	27.06.68	13.02.95 FC 01.06.96 JC	02.12.2009	
200.	Ghulam Mustafa	Peshawar	10th	15.01.77	19.11.96	02.12.2009	
201.	Muhammad Arshad	Lakki Marwat	B.A	18.12.80	28.12.99	02.12.2009	
202.	Javed Iqbal	Kohat	BA	15.02.71	28.12.99	02.12.2009	
203.	Mukhtiar Khan (17)	Tank	F.A	15.04.70	01.09.1992 as Daftarl 28.12.1999	11.12.2012	Assigned revise seniority with his coll order No: 9319-21/E-III, dated: 23
204.	Muhammad Ibrahim Shah	Lakki	BA	16.07.75	29.12.99	02.12.2009	
205.	Israr Ali	Peshawar	BA	15.04.78	29.12.99	02.12.2009	
206.	Saif ur Rehman	Peshawar	B.Sc	15.04.73	30.12.99	02.12.2009	
207.	Ikram Ullah	Peshawar	D.Com	09.04.76	30.12.99	02.12.2009	
208.	Sarfaraz Khan	Malakand	10th	15.04.67	30.12.99 absorb as a J/c	02.12.2009	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
351.	Saif ud Din	Kohat	F.Sc	10.08.1984	12.06.2009	22.07.2013	
352.	Farman Ali	Shangla	F.A	11.03.1987	12.06.2009	22.07.2013	
353.	Muhammad Nawaz	Dir Upper	BA	08.03.1971	12.06.2009	22.07.2013	
354.	Muhammad Haroon	DIKhan	10 <sup>th</sup>	27.07.1990	12.06.2009	22.07.2013	
355.	Kifayat Ullah	Bannu	FA	14.03.1988	12.06.2009	22.07.2013	
356.	Muhammad Shoaib	Lakki	B.Sc (Hounrs)	05.04.1988	12.06.2009	22.07.2013	
357.	Jalat ud Din	Lakki	FA	22.02.1984	12.06.2009	22.07.2013	
358.	Irfanullah	Lakki	F.Sc	08.04.1989	12.06.2009	22.07.2013	
359.	Farooq Shah	Charsadda	MA	07.04.1985	12.06.2009	22.07.2013	

(MIAN MUHAMMAD ASIF)  
 Addl: IGP/Headquarters  
 For Provincial Police Officer,  
 Khyber Pakhtunkhwa  
 Peshawar

EV  
 23  
 11/11/14

No. 264-99 E/V, dated Peshawar, the 11/13 /2014.

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

1. All Addl: IsGP in Khyber Pakhtunkhwa
2. All Regions DisG in Khyber Pakhtunkhwa
3. Capital City Police Officer Peshawar
4. DisG CTD, Traffic & Telecommunication, Khyber Pakhtunkhwa Peshawar
5. Commandants PTC Hangu,
6. Registrar CPO
7. Office Supdt: Secret CPO

They are requested to inform all the officers serving under their command. Any officer who has any objection regarding his seniority, he must submit his representation within one week after the issuance of the list, otherwise no representation will be entertained.





S/NO	NAME	DATE OF BIRTH	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	DATE OF RETIREMENT	REMARKS
13.	Muhammad Jamshid	20.03.63	Mansehra	10th	18.02.88	05.06.2009	19.03.2023	Assigned revised/inter-se-seniority.
14.	Muhammad Zahid	04.04.68	Mansehra	10th	24.03.88	16.01.2008	03.04.2028	
15.	Ilhamullah	16.02.63	Charsadda	10th	25.08.82	16.01.2008	05.02.2023	
16.	Sajjad Hussain	24.04.68	Peshawar	10th	03.02.88	16.01.2008	23.04.2028	
17.	Shah Farooq	01.03.67	Kohat	BA	07.03.88	16.01.2008	28.02.2027	
18.	Gul Nawaz	03.03.70	Bannu	10th	15.08.88	16.01.2008	02.03.2030	
19.	Ihsanullah	11.05.67	Charsadda	10 <sup>th</sup>	19.09.88	11.12.2012 ✓	10.05.2027	Assigned revised/inter-se-seniority.
20.	Javed Ali	16.09.68	Charsadda	FA	19.09.88	16.01.2008	15.09.2028	
21.	Inamullah	12.04.69	Bannu	FA	25.09.88	16.01.2008	11.04.2029	
22.	Abdul Aziz	10.08.60	Swat	10 <sup>th</sup>	01.08.82 C-IV 01.10.88 JC	16.01.2008	09.08.2020	
23.	Sajjad Anwar	12.02.67	Kohat	F.A	02.10.88	11.12.2012 ✓	11.02.2027	Assigned revised/inter-se-seniority.
24.	Muqrab Alam Khan	07.10.70	Mardan	10th	08.10.88	16.01.2008	06.10.2023	
25.	Abdur Rauf	14.02.70	Lakki	10 <sup>th</sup>	18.12.88	11.12.2012 ✓	13.02.2030	Assigned revised/inter-se-seniority.
26.	Tahseen Ullah	10.01.65	Charsadda	F.A	03.07.89	16.01.2008	09.01.2025	
27.	Nadeem Ahmad	11.04.71	Mansehra	10th	05.07.89	02.12.2009	10.04.2031	Assigned revised/inter-se-seniority.

Registrar

SE-I

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SE-V

SE-IV

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	NAME	DATE OF BIRTH	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	DATE OF RETIREMENT	REMARKS
173.	Mehrab Hayat	10.11.73	Chitral	10th	22.05.96	02.12.2009	09.11.2033	
174.	Muhammad Mushtaq	27.06.68	DIKhan	FA	13.02.95 FC 01.06.96 JC	02.12.2009	26.06.2028	
175.	Ghulam Mustafa	15.01.77	Peshawar	10th	19.11.96	02.12.2009	14.01.2037	
176.	Muhammad Arshad	18.12.80	Lakki	B.A	28.12.99	02.12.2009	17.12.2040	
177.	Javed Iqbal	15.02.71	Kohat	BA	28.12.99	02.12.2009	14.02.2031	
178.	Mukhtiar Khan	15.04.70	Tank	F.A	01.09.1992 as Daftari 28.12.1999	11.12.2012	14.04.2030	
179.	Muhammad Ibrahim Shah	16.07.75	Lakki	BA	29.12.99	02.12.2009	15.07.2035	
180.	Israr Ali	15.04.78	Peshawar	BA	29.12.99	02.12.2009	14.04.2038	
181.	Saif ur Rehman	15.04.73	Peshawar	B.Sc	30.12.99	02.12.2009	14.04.2033	
182.	Ikram Ullah	09.04.76	Peshawar	D.Com	30.12.99	02.12.2009	08.04.2036	
183.	Sarfaraz Khan	15.04.67	Malakand	10th	30.12.99 absorb as a J/C	02.12.2009	14.04.2027	
184.	Faisal Qamar	02.02.77	Peshawar	BA	30.12.99	02.12.2009	01.02.2037	
185.	Rifaqat Ali	28.02.80	Peshawar	FA	31.12.99	02.12.2009	27.02.2040	
186.	Muhammad Afzal	01.01.72	Abbottabad	FA	01.01.2000	02.12.2009	31.12.2031	

Registrar

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Supdt: Secret

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SE-IV

OS, CP

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/NO	NAME	DATE OF BIRTH	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	DATE OF RETIREMENT	REMARKS
							05.01.2040	
314.	Bilal Hussain	06.01.80	Peshawar	BA	12.06.2009	22.07.2013		
315.	Iftikhar Ahmad	16.03.86	Charsadda	BA	12.06.2009	22.07.2013	15.03.2046	
316.	Malik Aman Khan	06.05.85	Nowshera	B.Sc	12.06.2009	22.07.2013	15.05.2045	
317.	Saif ud Din	10.08.84	Kohat	F.Sc	12.06.2009	22.07.2013	09.08.2044	
318.	Farman Ali	11.03.87	Shangla	FA	12.06.2009	22.07.2013	10.03.2047	
319.	Muhammad Nawaz	08.03.71	Dir Upper	BA	12.06.2009	22.07.2013	07.03.2031	
320.	Muhammad Haroon	27.07.90	DIKhan	10 <sup>th</sup>	12.06.2009	22.07.2013	26.07.2050	
321.	Kifayat Ullah	14.03.88	Bannu	FA	12.06.2009	22.07.2013	13.03.2048	
322.	Muhammad Shoaib	05.04.88	Lakki	B.Sc (Honrs)	12.06.2009	22.07.2013	04.04.2048	
323.	Jalal ud Din	22.02.84	Lakki	FA	12.06.2009	22.07.2013	01.02.2044	
324.	Irfanullah	08.04.89	Lakki	F.Sc	12.06.2009	22.07.2013	07.04.2049	
325.	Farooq Shah	07.04.85	Charsadda	MA	12.06.2009	22.07.2013	06.04.2045	

(MIAN MUHAMMAD ASIF)

Addl: IGP/Headquarters,  
For Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

No. 4122-95 E-V, dated Peshawar, the 17 / 106 / 2015.

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

1. All Heads of Police Offices in Khyber Pakhtunkhwa.
2. All Branches in CPO, Peshawar.
3. Incharge, Central Registry Cell, CPO, Peshawar.

4. They are requested to inform all the officers serving under their command. Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within one month after the issuance of the list, otherwise no representation will be entertained.

Registrar

SE-I

Supdt. Secret

SE-V

SE-IV

OS, CP

D 27

Tel: No.091-9210381  
Fax: No.091-9210638

From : The Deputy Inspector General of Police,  
Telecomm: Khyber Pakhtunkhwa, Peshawar.

To : The Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

No. 8681 /EC, dated Peshawar the 7 / 7 /2015.

Subject: SENIORITY LIST OF SENIOR CLERKS (BPS-14) AS IT STOOD ON 01.06.2015.

Memorandum:

Kindly refer to your office Endst: No. 4122-95/E-V, dated 17.06.2015 on the subject noted above.

Applications of the following Senior Clerks objection on the seniority list of 2015 are submitted for further necessary action please -

1. Muhammad Taufail Senior Clerk
2. Israr All Senior Clerk

Deputy Inspector General of Police,  
Telecomm: Khyber Pakhtunkhwa, Peshawar.

9/7

4/7/17

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Sir,

I invited your kind attention to seniority list 2015 vide issued PPO, order No4121-95/E-V, dated 17.06.2015 my name placed in seniority list 2015 is at Serial No 180 whereas, serial No 19,23,25,61,99,106,108,115,124,128,129,130,135,158,165 and 178 were promoted later than me but in the seniority list shows that they are senior then me, on the basis of that they were deferred due to incomplete ACR/PER which is not correct. The fact is that they were deferred due to not willing to get promotion or they were posted on choice seats. It should be verified for their Character Roll and Service Book.

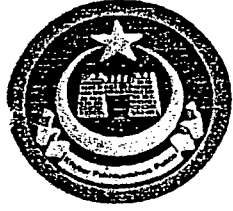
It is therefore, requested that kindly restore my seniority most senior than the above mentioned senior clerk in the seniority list 2015.

Your's obediently

180/180  
07/17/2015

(Usrar Ali)  
Senior Clerk  
Telecomm: Hqrs: Peshawar

Accepted  
[Signature]



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

last  
issue  
S/L

SENIORITY LIST OF SENIOR CLERKS (BPS-14) AS IT STOOD ON 31.12.2017

No. 1551 /E-V: The Seniority list of Senior Clerks (BPS-14) of Khyber Pakhtunkhwa Police is published for information of all concerned.

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
1.	Roohullah Jan	08.01.1966	07.01.2026	Charsadda	F.A	01.11.1987	06.09.2012	Reverted to the lower post as Senior Clerk vide order No.8327/ES dated 09.11.2017 RPO Mardan Departmental Enquiry Initiated Against him
2.	Muhammad Iqbal	20.11.1960	19.11.2020	Kohat	F.A	04.02.1979	05.09.1988	1)- Reverted to the lower post as Senior Clerk vide order No. 4558-67/EV dated 06.07.2015 2)- Deferred from promotion due to incomplete ACR for the period from 01.01.2015 to 31.12.2015 vide order No.6597-6610/EV dated 31.10.2017
3.	Akbar Ali	09.02.1963	08.02.2023	Swat	10 <sup>th</sup>	17.01.1982	17.07.1990	1)- Deferred from promotion due to incomplete ACR for the period from 03.07.2013 to 31.12.2013 vide order No.6597-6610/EV dated 31.10.2017
4.	Haibat Khan	30.09.1963	29.09.2023	Bannu	F.A	19.08.1982	16.08.1992	1)- Deferred from promotion due to incomplete ACR for the period from 01.09.2012 to 31.12.2012, 07.03.2013 to 31.12.2013 & for the year 2014, 2015 & 2016. vide order No.6597-6610/EV dated 31.10.2017

*[Handwritten signature]*

*[Handwritten signature]*  
Superintendent F-V.

*[Handwritten signature]*  
Superintendent CPB.

*[Handwritten signature]*  
Registrar.

AIG/Establishment.

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
133.	Javed Ali	03.08.1969	02.08.2029	Charsadda	F.A	20.06.1995	02.12.2009	
134.	Farhatullah	15.09.1974	14.09.2034	Peshawar	F.A	19.07.1995	02.12.2009	
135.	Umar Gul	01.05.1969	30.04.2029	Peshawar	D.Com	13.09.1995	02.12.2009	
136.	Muhammad Saleem	15.09.1969	14.09.2029	DIKhan	BA/LLB	10.10.1995	02.12.2009	
137.	Maqsd ur Rehman	05.06.1972	04.06.2032	Peshawar	10 <sup>th</sup>	12.11.1995	02.12.2009	
138.	Mehrab Hayat	10.11.1973	09.11.2033	Chitral	10 <sup>th</sup>	22.05.1996	02.12.2009	
139.	Muhammad Mushtaq	27.06.1968	26.06.2028	DIKhan	F.A	13.02.1995 FC 01.06.1996 JC	02.12.2009	
140.	Ghulam Mustafa	15.01.1977	14.01.2037	Peshawar	10 <sup>th</sup>	19.11.1996	02.12.2009	
141.	Muhammad Arshad	18.12.1980	17.12.2040	Lakki	B.A	28.12.1999	02.12.2009	
142.	Javed Iqbal	15.02.1971	14.02.2031	Kohat	B.A	28.12.1999	02.12.2009	
143.	Mukhtiar Khan	15.04.1970	14.04.2030	Tank	F.A	01.09.1992 as Daftari 28.12.1999	11.12.2012	→
144.	Muhammad Ibrahim Shah	16.07.1975	15.07.2035	Lakki	B.A	29.12.1999	02.12.2009	→
145.	Israr Ali	15.04.1978	14.04.2038	Peshawar	B.A	29.12.1999	02.12.2009	
146.	Ikram Ullah	09.04.1976	08.04.2036	Peshawar	D.Com	30.12.1999	02.12.2009	
147.	Sarfraz Khan	15.04.1967	14.04.2027	Malakand	10 <sup>th</sup>	30.12.1999 absorb as a l/c	02.12.2009	

Superintendent E-V.

Superintendent CPB.

Registrar.

AIG/Establishment.

*Mehrab Hayat*

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S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
324.	Muhammad Nawab	01.02.1976	31.01.2036	Swat	10 <sup>th</sup>	20.11.1994	11.12.2012	He was compulsory retired from service vide CPO order No.2569-74/EV dated 21.04.2015. Consequent upon the judgment of sevice tribunal KPK he has been re-instated in services vide CPO order No.3238-46/EV dated 30.05.2016 subject to the de-novo enquiry. On the recomendation of the enquiry officer the RPO Malakand awarded him puishment of stopage of 01 Annual increment with cumulative effect vide :letter No. 9256/E; dated 04.10.2017.

31  
Superintendent E-V,

Superintendent CPB,

Registrar, AIG/Establishment.

(SHER AKBER) PSP, S.St  
Deputy Inspector General of Police, HQrs:  
For Inspector General of Police  
Khyber Pakhtunkhwa, Peshawar.

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No. 1552-90 /EV, dated Peshawar, the 30 / 03 /2018.

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

1. Addl: Inspector General of Police, Investigation, Special Branch, Operation & Elite Force Khyber Pakhtunkhwa.
2. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
3. Commandant, PTC, Hangu.
4. Commandant, CPC, Peshawar.
5. Capital City Police Officer, Peshawar.
6. All Regional Police Officers in Khyber Pakhtunkhwa, Peshawar.
7. Deputy Inspector General of Police, Traffic, CTD, Training, E&I & Telecommunications, Khyber Pakhtunkhwa.
8. Senior Superintendent of Police Traffic, Peshawar.
9. Assistant Inspector General of Police, BDS, Peshawar.
10. Director, FSL, Khyber Pakhtunkhwa, Peshawar.
11. Director, IT, CPO, Peshawar.
12. All District Police Officers in Khyber Pakhtunkhwa.
13. Deputy Superintendent of Police, PQR.
14. All Branches in CPO, Peshawar.
15. In-charge, Central Registry Cell, CPO, Peshawar.

**NOTE:-** They are requested to inform all the officers serving under their command. Any officer who has any objection regarding his seniority/ missing of name/date of birth etc, he must submit his representation within one month after the issuance of the list, otherwise no representation will be entertained after the specific period.

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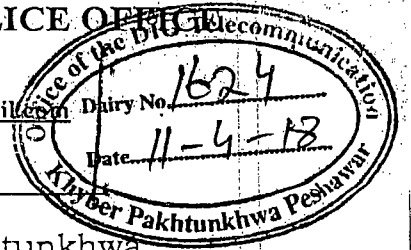
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**OFFICE OF THE INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA, CENTRAL POLICE OFFICE  
PESHAWAR**

Ph: 091-9210545 Fax: 091-9210927 Email: [OSEstabV@gmail.com](mailto:OSEstabV@gmail.com)



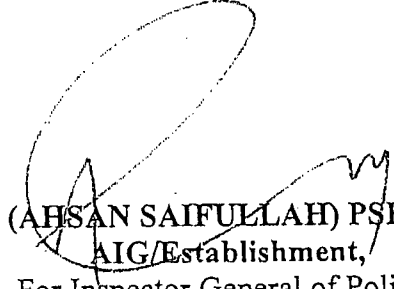
No. 1996-2050 /E-V, dated, Peshawar the, 09.04.2018.

To: - The All Heads of Police Offices in Khyber Pakhtunkhwa.

Subject: - **SENIORITY LIST OF MINISTERIAL STAFF AS STOOD ON  
31.12.2017.**

Memo:-  
Seniority lists of following Ministerial Staff are displayed on  
Khyber Pakhtunkhwa Police Website:-

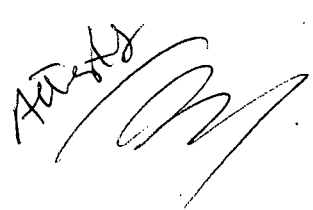
1. Office Superintendent (BPS-17)
2. Assistant Grade Clerk (BPS-16)
3. Stenographer (BPS-16)
4. Computer Operator (BPS-16)
5. Qualitative/Quantitative Analyst (BPS-16)
6. Steno Typist (BPS-14)
7. Senior Clerk (BPS-14)
8. Junior Clerk (BPS-11)


  
**(AHSAN SAIFULLAH) PSP  
AIG/Establishment,**  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

No. 2051-60 /E-V, dated Peshawar the, 09.04.2018.  
Copy is forwarded to the:-

- All Addl: IsGP in Khyber Pakhtunkhwa.
- DIG/HQrs Khyber Pakhtunkhwa.
- PSO to IGP Khyber Pakhtunkhwa.
- Director I.T CPO Peshawar. He may please upload the Seniority Lists on  
Khyber Pakhtunkhwa Police Website.
- PA to the AIG/Establishment Khyber Pakhtunkhwa Peshawar.
- Central Registry Cell CPO Peshawar.

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**(AHSAN SAIFULLAH) PSP  
AIG/Establishment,**  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

  
/Tele

SPC

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**OFFICE OF THE DEPUTY INSPECTOR GENERAL OF POLICE**  
**TELECOMM: & TRANSPORT, KHYBER PAKHTUNKHWA, PESHAWAR.**

No. 4715-18 /Tele/EC, dated Peshawar the 19-9- /2018.

Copy forwarded to the:-

1. Office Supdt: Telecomm: Peshawar.
2. Office Supdt: MT, Peshawar.
3. PA to DIG Telecomm: Peshawar.
4. All Ministerial Staff Telecomm: HQrs: Peshawar.

*Amir Amir*

Deputy Inspector General of Police,  
Telecomm: Khyber Pakhtunkhwa, Peshawar.

*Amir*

*Amir*

F 35

Tel: No.091-9210381  
Fax: No.091-9210638

From : The Deputy Inspector General of Police,  
Telecomm: Khyber Pakhtunkhwa, Peshawar.

To : The Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

No. 5725 /EC, dated Peshawar the 11/15/2018.

Subject: SENIORITY LIST OF SENIOR CLERKS (BPS-14).

Memorandum:

Kindly refer to your office Endst: No. 1996-2050/E-V, dated 09.04.2018 on the subject noted above.

Applications of the following Senior Clerks objection on the seniority list are submitted for further necessary action please.

1. Muhammad Taufail Senior Clerk
2. Israr Ali Senior Clerk

*Wahid Ahmad*  
Deputy Inspector General of Police,  
Telecomm: Khyber Pakhtunkhwa, Peshawar.  
11/15/2018

*ACAS*

Sir,

I would like to invite your kind attention to the seniority list issued vide PPO order No.1996-2050/E-V, dated 09.04.2018 and No.1552-90/E-V, dated 30.03.2018 wherein my name has been placed at Serial No. 145 of the List and the following senior clerks have been shown senior to me:-

S/No.	Name	Shown senior to me At the following serial Nos.
1.	Muhammad Javed	14
2.	Israr Ali	33
3.	Noor Khan	73
4.	Nadeem Ullah	75
5.	Badshah Din	82
6.	Arshad	91
7.	Muhammad Azam	95
8.	Abdul Malik	102
9.	Fazle Maula	124
10.	Saif ur Rehman	131
11.	Mukhtiar Khan	143
12.	Muhammad Ibrahim Shah	144

In addition to above, in the seniority list of Assistant Grade Clerks issued vide PPO order No.1511-1550/E-V, dated 30.03.2018 the following were junior to me but have been granted promotion as Assistant Grade Clerks:-

S/No.	Name	At serial No. of seniority list of Asstt: Grade Clerks
1.	Ihsanullah	121
2.	Sajjad Anwar	124
3.	Abdur Rauf	126
4.	Nadeem Ahmad	128

In the seniority list of Asstt: Grade Clerks, Column No.6 date of enlistment and date of promotion as senior clerk has been mentioned up to serial No.10 whereas from serial No.11 to 132 has not been mentioned which creates ambiguity as to whether which one of this has been focused while granting promotion. The same dates should have been mentioned in the same column to know the date of promotion. Similarly the date of promotion as senior clerks of above 04 Asstt: Grade Clerks has not been mentioned in the seniority list of Asstt: Grade Clerks, whereas, they were promoted as senior clerks later than me.

The plea taken in the seniority list that they were differed due to incomplete ACRs/PERs which is incorrect. Actually they were deferred being unwilling to get promotion or to get their choice posting. It could be verified from their service records.

It is therefore, requested that revised seniority list showing my name senior to the above may kind be issued.

Yours obediently,

(ISRAR ALI)  
Senior Clerk

Telecomm: Khyber Pakhtunkhwa,  
Peshawar.

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Sir,

I would like to invite your kind attention to the seniority list issued vide PPO order No.1441-1467/E-V, dated 26.03.2019 wherein my name has been placed in list 2019 at 141 whereas, the following senior clerks have been show senior to me:-

S/No.	Name	Show senior to me at the following serial Nos.
1.	Muhammad Javed	15
2.	Israr Ali	33
3.	Noor Khan	72
4.	Nadeem Ullah	74
5.	Badshah Din	81
6.	Arshad	89
7.	Hakim Khan	93
8.	Abdul Malik	98
9.	Fazle Maula	120
10.	Saif ur Rehman	127
11.	Mukhtiar Khan	139
12.	Muhammad Ibrahim Shah	140

In addition to above, in the seniority list of Assistant Grade Clerks issued vide PPO order No.1423-40/E-V, dated 26.03.2019, the following were junior to me but have been granted promotion as Assistant Grade Clerks

S/No.	Name	At serial No. of seniority list of Asstt: Grade Clerks
1.	Ihsanullah	104
2.	Sajjad Anwar	107
3.	Abdur Rauf	109
4.	Nadeem Ahmad	111

In the seniority list of Asstt: Grade Clerks, Column No.6 dated of enlistment and date of promotion as senior clerk has been mentioned up to serial No.4 whereas from serial No.5 to 115 have not been mentioned which creates ambiguity as to whether which one of this has been focused while granting promotion. The same dates should have been mentioned in the same column to know the date of promotion. Similarly, the date of promotion as senior clerks of above 04 Asstt: Grade Clerks have not been mentioned in the seniority list of Asstt: Grade Clerks whereas they were promoted as senior clerks later than me.

The plea taken in the seniority list that they were deferred due to incomplete ACRs/PERs which is incorrect. Actual they were deferred being unwilling to get promotion or to get their choice posting. It could be verified from their service records.

Before 2012, there was no issue of restoration of seniority in the seniority list, however, after 2012, the said issue has been raised which disturbed all cadres' seniorities i.e Junior Clerk, Senior Clerks, Asstt: Grade Clerks. In this regard, I have already submitted my reservations on the seniority lists which were received in Telecommunication in the year 2015, 2017 & 2018 vide letter No.8681/EC, dated 7.07.2015, No.5856/EC, dated 17.05.2017 and letter No.5725/EC, dated 11.05.2018 (Copy enclosed for ready reference) but I did not received any reply about my reservations till to date.

It is therefore, requested that revised seniority list showing my name senior to the above may kindly be issued.

Yours obediently,

(ISRAR ALI)  
Senior Clerk  
Police Telecommunication  
Khyber Pakhtunkhwa, Peshawar.



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

REVISED SENIORITY LIST OF SENIOR CLERKS (BPS-14) AS IT STOOD ON 30.06.2020

No. 3751 /E-V: As per direction of the Competent Authority the Seniority list of Senior Clerks (BPS-14) of Khyber Pakhtunkhwa Police has been revised after threadbare efforts and previous Seniority list have been merged to fix batch-wise Seniority is published for information to all concerned.

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
1.	Muhammad Iqbal	20.11.1960	19.11.2020	Kohat	F.A	04.02.1979	05.09.1988	Awarded major punishment of reversion from Assistant (BPS-16) to Senior Clerk (BPS-14) vide order No. 4558-67/EV dated 06.07.2015.
2.	Haibat Khan	30.09.1963	29.09.2023	Bannu	F.A	19.08.1982	16.08.1992	
3.	Muhammad Aslam	18.05.1965	17.05.2025	Bannu	10 <sup>th</sup>	06.10.1985	02.12.2009	
4.	Roohullah Jan	08.01.1966	07.01.2026	Charsadda	F.A	01.11.1987	06.09.2012	Awarded major punishment of reversion from Assistant (BPS-16) to the rank of Senior Clerk (BPS-14) vide RPO/Mardan order No. 8327-28/ES, dated 09.11.2017 and Departmental Appeal also rejected vide order No. 869-77/E-V, dated 19.02.2018 by Addl: IGP/HQrs: KPK Peshawar.
5.	Muhammad Shafiq	01.05.1962	30.04.2022	Karak	F.A	02.11.1987	02.07.2015	

Superintendent/E-V,

Superintendent CPB,

Registrar,

*[Handwritten signature]*

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S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
✓141	Inayat ur Rehman	08.02.1968	07.02.2028	MKD Agency	FSc	08.01.1996	22.07.2013	
✓142	Gul Akbar	22.03.1975	31.03.2035	MKD: Agency	10 <sup>th</sup>	07.05.1996	22.07.2013	
✓143	Diljan	18.03.1969	17.03.2029	Lakki	M.A	08.05.1996	02.07.2015	
144	Mehrab Hayat	10.11.1973	09.11.2033	Chitral	10 <sup>th</sup>	22.05.1996	02.12.2009	
✓145	Tehseenullah-I	24.03.1966	23.03.2026	Charsadda	F.A	01.06.1996	11.12.2012	
✓146	Said Ghulam	12.04.1972	11.04.2032	DI Khan	10 <sup>th</sup>	18.06.1996	11.12.2012	
147	Ghulam Mustafa	15.01.1977	14.01.2037	Peshawar	10 <sup>th</sup>	19.11.1996	02.12.2009	
✓148	Muhammad Anwar	01.01.1974	31.12.2033	Lakki Marwat	F.A	09.03.1997	07.11.2019	
149	Muhammad Arshad	18.12.1980	17.12.2040	Lakki	B.A	28.12.1999	02.12.2009	
150	Javed Iqbal	15.02.1971	14.02.2031	Kohat	B.A	28.12.1999	02.12.2009	
✓151	Mukhtiar Khan	15.04.1970	14.04.2030	Tank	F.A	01.09.1992 as Daftari 28.12.1999	11.12.2012	
✓152	Mohammad Altaf	07.02.1970	06.02.2030	Kohat	10 <sup>th</sup>	28.12.1999	02.07.2015	Removed from Service w.e.f 14.10.2002 being involved in criminal case. Later-on re-instated vide Endst: No.5210-14/E-III dated 24.03.2006. Revised order issued vide Endst: No. 12741-43/E-III dated 01.06.2007.
153	Muhammad Ibrahim Shah	16.07.1975	15.07.2035	Lakki	B.A	29.12.1999	02.12.2009	

39  
Superintendent/E-V,

Superintendent CPB,

Registrar,

*[Handwritten signature]*  
Hassan

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
154.	Israr Ali-I	15.04.1978	14.04.2038	Peshawar	B.A	29.12.1999	02.12.2009	
155.	Ikram Ullah	09.04.1976	08.04.2036	Peshawar	D.Com	30.12.1999	02.12.2009	
156.	Sarfaraz Khan	15.04.1967	14.04.2027	Malakand	10 <sup>th</sup>	30.12.1999 absorb as a J/c	02.12.2009	
157.	Faisal Qamar	02.02.1977	01.02.2037	Peshawar	B.A	30.12.1999	02.12.2009	
158.	Rifaqat Ali	28.02.1980	27.02.2040	Peshawar	F.A	31.12.1999	02.12.2009	
159.	Muhammad Afzal-I	01.01.1972	31.12.2031	Abbottabad	F.A	01.01.2000	02.12.2009	
160.	Fida Muhammad	13.04.1972	12.04.2032	Mardan	D.Com	01.07.1991 FC 01.01.2000 JC	11.12.2012	
161.	Muhammad Abid-II	10.03.1971	09.03.2031	D.I Khan	M.A	03.01.2000	02.12.2009	
162.	Muhammad Imran	02.04.1974	01.04.2034	Peshawar	B.A	03.01.2000	11.12.2012	
163.	Falak Naz	12.12.1966	11.12.2026	Bannu	10 <sup>th</sup>	03.01.2000	22.07.2013	
164.	Haqiq-Ul-Islam	01.03.1974	28.02.2034	Peshawar	M.A	04.01.2000	02.12.2009	
165.	Kishwar Ali	10.10.1974	09.10.2034	Mardan	D.Com	04.01.2000	11.12.2012	
166.	Faqir Muhammad-I	01.01.1975	31.12.2034	Malakand Agency	F.A	05.01.2000	02.12.2009	

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Superintendent/E-V,

Superintendent CPB,

Registrar,

*Handwritten signature*

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
369.	Muhammad Younas Khan	15.02.1975	14.02.2035	Bannu	M.A	07.07.2009	07.11.2019	
370.	Sanauallah	10.05.1985	09.05.2045	Peshawar	F.A	07.07.2009	07.11.2019	
371.	Sajid Ali Shah	30.03.1977	29.03.2037	Kohat	F.A	08.07.2009	07.11.2019	
372.	Asif Khan	04.02.1982	03.02.2042	Charsadda	M.A	08.07.2009	07.11.2019	
373.	Toqeer Ahmad	20.09.1978	19.09.2038	Abbottabad	10 <sup>th</sup>	08.07.2009	07.11.2019	
374.	Sohail Ahmad	04.08.1984	03.08.2044	Peshawar	F.SC	23.07.2009	07.11.2019	

**NOTE:-** Any officer who has any objection regarding his Seniority/Missing of name/Date of Birth etc, he must submit his representation within one month after the issuance of this list, otherwise no representation will be entertained after the specific period.

41  
Superintendent E-V,

Superintendent CPB,

Registrar,

(KASHIF ZULFIQAR) PSP  
AIG/Establishment  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

No. 3752-70 /E-V, dated Peshawar, the 21/10/2020.

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

1. All Addl: Inspector General of Police, in Khyber Pakhtunkhwa.

2. Capital City Police Officer, Peshawar.
3. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
4. Commandant, PTC, Hangu.
5. All Regional Police Officers in Khyber Pakhtunkhwa.
6. All Deputy Inspector General of Police, in Khyber Pakhtunkhwa.
7. Chief Traffic Officer, Peshawar.
8. Commandant, CPC, Peshawar.
9. Assistant Inspector General of Police, BDU, Peshawar.
10. Director, FSL, Khyber Pakhtunkhwa, Peshawar.
11. Director, IT, CPO, Peshawar.
12. All District Police Officers in Khyber Pakhtunkhwa.
13. All Superintendent of Police, Investigations in Khyber Pakhtunkhwa.
14. Deputy Superintendent of Police, PQR
15. All Branches in CPO, Peshawar.
16. In-charge, Central Registry Cell, CPO, Peshawar.

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Subject:

APPEAL AGAINST SENIORITY LIST OF SENIOR CLERKS BPS-14 FOR THE YEAR 2020

Sir,

I would like to invite your kind attention to the seniority list of Senior Clerks BPS-14 for the year 2020 issued vide PPO order No.3751-70/E-V, dated 21.10.2020 and uploaded on Khyber Pakhtunkhwa Police official website [www.kppolice.gov.pk](http://www.kppolice.gov.pk) wherein my name has been placed at 154 below the name of Muhammad Ibrahim Shah, the following senior clerks who are junior to me have been shown senior to me as while I was promoted as Senior Clerk on 02.12.2009, while they were promoted later than me. Detail is as under:

S#	Name	Date of promotion as Senior Clerk	Show senior to me at the following serial Nos.	S#	Name	Date of promotion as Senior Clerk	Show senior to me at the following serial Nos.
1.	Muhammad Shafique	02.07.2015	05	40.	Hakim Khan	11.12.2012	73
2.	Gul Said	11.12.2012	06	41.	Khan Bahadar	22.07.2013	74
3.	Akhtar Hussain-I	11.12.2012	07	42.	Abdul Malik	11.12.2012	79
4.	Farmanullah	11.12.2012	08	43.	Muhammad Anees	07.11.2019	87
5.	Abdul Karim	02.07.2015	10	44.	Fazle Khuda	07.11.2019	88
6.	Gul Rehman	22.07.2013	11	45.	Sakhi Muhammad	02.07.2015	89
7.	Ibrar Hussain	07.11.2019	12	46.	Javed Khan-II	02.11.2012	93
8.	Sharafatullah	11.12.2012	13	47.	Mohammad Shoaib	07.11.2019	96
9.	Gohar Ali	11.12.2012	14	48.	Sher Nawaz	11.12.2012	99
10.	Shoaib	11.12.2012	15	49.	Rahim Dad	11.12.2012	100
11.	Muhammad Abid-I	22.07.2013	16	50.	Muhammad Nawab	11.12.2012	103
12.	Muhammad Bilal-I	22.07.2013	17	51.	Shah Faisal	11.12.2012	106
13.	Ghaffar Ali	22.07.2013	18	52.	Ghulam Muhammad	11.12.2012	110
14.	Imdad Hussain Shah	22.07.2013	19	53.	Fazle Maula	22.07.2013	111
15.	Muhammad Saeed	22.07.2013	20	54.	Noor ul Islam	11.12.2012	113
16.	Hussain Habib	11.12.2012	21	55.	Tassawar Hussain	07.11.2019	114
17.	Muhammad Farman Ali	02.07.2015	22	56.	Syed Abdul Hameed	11.12.2019	115
18.	Fazal Khaliq	02.07.2015	24	57.	Muhammad Ashfaq	11.12.2019	116
19.	Ajmal Khan	07.11.2019	25	58.	Gujar Khan	11.12.2012	117
20.	Shah Zaman-I	11.12.2012	26	59.	Haroon Rashid	07.11.2019	118
21.	Muhammad Younis	11.12.2012	31	60.	Saif ul Rehman	11.12.2012	124
22.	Zakria Khan	07.11.2019	35	61.	Jamal Shah	22.07.2013	127
23.	Akhtar Hussain-II	11.12.2012	38	62.	Qabool Jan	02.07.2015	129
24.	Raj Malook	02.07.2015	39	63.	Samin Jan	11.12.2012	130
25.	Noor-ul-Arifeen	07.11.2019	40	64.	Kifayatullah	11.12.2012	132
26.	Ijaz Khan	22.07.2013	41	65.	Parisan Khan	11.12.2012	134
27.	Esa Khan	11.12.2012	42	66.	Shah Faisal	11.12.2012	135
28.	Gul Karim	02.04.2015	43	67.	Hamidullah	11.12.2012	136
29.	Shahid Mehmood	11.12.2012	46	68.	Abdur Rehman	11.12.2012	137
30.	Dost Muhammad	02.07.2015	47	69.	Abdul Waheed	11.12.2012	139
31.	Ikram-ul-Haq	07.11.2019	49	70.	Muhammad Ajmal	22.07.2013	140
32.	Shah Iran	02.07.2015	50	71.	Inayat ur Rehman	22.07.2013	141
33.	Rashid Mehmood	07.11.2019	54	72.	Gul Akbar	22.07.2013	142
34.	Badshah Din	11.12.2012	58	73.	Dil Jan	02.07.2015	143
35.	Sherin Badshah	11.12.2012	61	74.	Tehseenullah-I	11.12.2012	145

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36.	Mir Muhammad	11.12.2012	65	75.	Said Ghulam	11.12.2012	146
37.	Javed Khan-I	11.12.2012	66	76.	Muhammad Anwar	07.11.2019	148
38.	Arshad	11.12.2012	68	77.	Mukhtiar Khan	11.12.2012	151
39.	Saifullah Khan	11.12.2012	69	78.	Muhammad Altaf	02.07.2015	152

In addition to above, in the seniority list of Assistant Grade Clerks issued vide PPO No.2620-30/E-V, dated 12.08.2020, the following were junior to me but were granted promotion as Assistant Grade Clerks, which I have already pointed out in my previous application/reservation.

S/No.	Name	Date of promotion as Senior Clerk	At serial No. of seniority list of Asstt: Grade Clerks
1.	Ihsanullah	11.12.2012	83
2.	Sajjad Anwar	11.12.2012	82
3.	Abdur Rauf	11.12.2012	87
4.	Muhammad Javed	11.12.2012	124
5.	Israr Ali	22.07.2013	135
6.	Anwar ul Hassan	11.12.2012	158
7.	Noor Khan	11.12.2012	162
8.	Nadeem Ullah	11.12.2012	163

Furthermore, in the seniority list of Asstt: Grade Clerks, Column No.6 date of enlistment/ promotion as senior clerk has been mentioned just for serial No.1,2 & 5 whereas, for the remaining officials nothing has been mentioned which creates ambiguity as to whether it is the date of enlistment or promotion as senior clerk. The same dates should mentioned against each official to know the date of promotion.

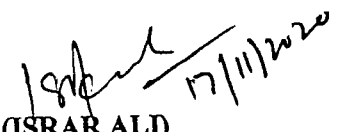
*The plea taken in the seniority list that they were deferred due to incomplete ACRs/PERs is incorrect as a lot of other officials including me were promoted as Senior Clerks conditionally despite of incomplete ACRs vide Notification No.29096-114/E-III, dated 02.12.2009 which can be verified from the minutes of the said DPC Notification enclosed at Annexure-A.*

*Actually they had submitted written options that they were unwilling for promotion at that time for the reason that they wanted choice postings, which can be verified from their service/CPO records.*

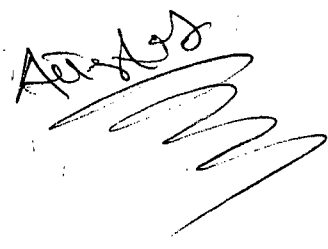
Before 2012, there was no issue of restoration of seniority in the seniority list, however, after 2012, the said issue has been raised which suffered all cadres' seniorities i.e Junior Clerk, Senior Clerks, Asstt: Grade Clerks. In this regard, I have already submitted my reservations on the seniority lists which were received in Telecommunication in the year 2015, 2017 & 2018 vide letter No.8681/EC, dated 7.07.2015, No.5856/EC, dated 17.05.2017, No.5725/EC, dated 11.05.2018 and last letter No.5179/Tele/EC, dated 26.04.2019 (Copies enclosed) but I did not received any reply about my reservations till to date.

It is therefore, requested that my name may please be placed at correct place and a revised seniority list may kindly be issued.

Yours sincerely,

  
(ISRAR ALI)  
Senior Clerk

Police Telecommunication  
Khyber Pakhtunkhwa, Peshawar.



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Tel: No.091-9210381  
Fax: No.091-9210638

From : The Deputy Inspector General of Police,  
Telecom: & Transport,  
Khyber Pakhtunkhwa, Peshawar.

The Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

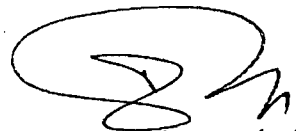
Tele/EC, dated Peshawar the 20 / 11 / 2020

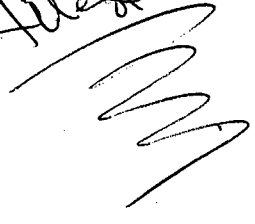
Subject: RESERVATION ON THE SENIORITY LIST OF SENIOR CLERKS BPS-14 AS IT  
STOOD ON 30.06.2020

Memorandum:

Kindly refer to your office Letter No.3751-70/E-V, dated 21.10.2020 uploaded on  
Khyber Pakhtunkhwa official website [www.kppolice.gov.pk](http://www.kppolice.gov.pk) on the subject cited above

Enclosed please find herewith an application submitted by Israr Ali Senior Clerk of this  
unit for further necessary action.

*o/c* ✓   
Deputy Inspector General of Police,  
Telecomm: & Transport,  
Khyber Pakhtunkhwa, Peshawar

*Attested*  


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

Service Appeal No. 5725/ 2021.

Israr Ali..... (Appellant)

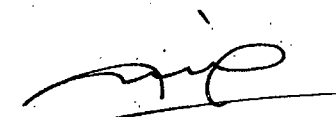
VERSUS

Inspector General of Police KP etc..... (Respondents)

**INDEX**

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Para-wise comments		1-2
2.	Affidavit		3
3.	Copy of section 17 of Khyber Pakhtunkhwa (Appointment, Promotion and Transfer) Rules, 1989	A	4

DEPONENT

  
(TARIQ UMAR)  
DSP/ Legal,  
CPO, Peshawar.



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

Service Appeal No. 5725/ 2021.

Israr Ali..... (Appellant)

VERSUS

Inspector General of Police KP etc..... (Respondents)

**PARA-WISE COMMENTS BY RESPONDENT NO. 1 & 2.**

**PRELIMINARY OBJECTIONS:-**

- a) That the appeal is badly time barred.
- b) That the appellant has got no cause of action and locus standi to file present appeal.
- c) That the appeal is bad for non-joinder and miss-joinder of necessary and proper parties.
- d) That the appellant is stopped by his own conduct to file the present appeal.
- e) That the appeal is not maintainable in the present form.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.

**FACTS:**

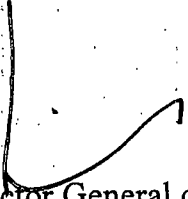
1. Pertains to service record of the appellant.
2. Pertains to record of inter se seniority of appellant and private respondents.
3. Incorrect. The appellant is junior to the private respondents as seniority always reckon from the first appointment not from the first promotion.
4. Pertains to record. In the revise seniority respondents placed the appellant and private respondents at right place in accordance with date of appointment under the Rules.
5. Pertains to record. The objection of appellant was misconceived and against the norms and Service Rules thus turned down.
6. Incorrect. As already explained in Para No. 3 that seniority always reckon from the first appointment not from the promotion hence the stance of the appellant is not legally justified as the seniors to the appellant are placed on right place in the seniority list. The instant service appeal of the appellant is not maintainable on the following Grounds.

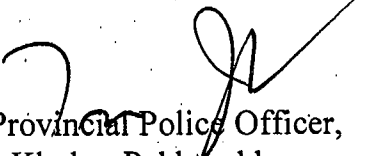
**GROUND:**

- A. Pertains to service record of the appellant.
- B. Incorrect. As already explained in Para No. 3 & 6 of Facts. Promotion does not affect the original seniority as per Section 17 Sub- Section b (I) & (II) of Civil Servants (Appointment, Promotions & Transfer) Rules, 1989. Seniority reckon from the date of appointment. (Copy of Section 17 of (Appointment Promotion and Transfer), Rules 1989 is enclosed as "A").
- C. Incorrect and misconceived. As already explained in preceding Paras. The plea of appellant has no legal value under the Service Rules.
- D. Incorrect. The appellant has got no cause of action as he is not an aggrieved person. Respondents have prepared seniority in accordance with law/ rules and then properly circulated.
- E. Incorrect. The answering respondents are bound to perform their duties in accordance with law/ rules. Seniority list is issued at the end of calendar year while revised seniority is issued on the representation of any official.
- F. Incorrect. As already explained that answering respondents acted in accordance with law/ rules and treated all the officials fairly and in accordance with Service Rules.
- G. Incorrect. Inter-se seniority of the officials is revised by the Committee in the light of representation of the aggrieved officials in accordance with facts and Rules. The application of the appellant was examined by the Committee and regretted.

**PRAYERS:**

In view of the above narrated facts, it is, humbly prayed that the instant service appeal is not maintainable being devoid of merits may kindly be dismissed with costs, please.

  
Deputy Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa,  
Peshawar.  
(Respondent No. 2)

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

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

Service Appeal No. 5725/ 2021.

Israr Ali..... (Appellant)

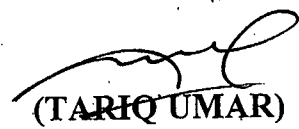
**VERSUS**

Inspector General of Police KP etc..... (Respondents)

**AFFIDAVIT**

I, Tariq Umar Acting DSP/ Legal CPO, Peshawar do hereby solemnly affirm on oath that the contents of accompanying comments on behalf of Respondents No. 1 & 2 are correct to the best my knowledge and belief. Nothing has been concealed from this Honorable Tribunal.

Respondents through



**(TARIQ UMAR)**

DSP/ Legal,  
CPO, Peshawar.  
17301-4997553-7  
0333-8878882

## PART-VI

### SENIORITY

17. **Seniority :-** (1) the seniority inter se of civil servants <sup>47</sup>(appointed to a service, cadre or post) shall be determined:-

- (a) in the case of persons appointed by initial recruitment; in accordance with the order of merit assigned by the Commission <sup>48</sup>[or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and
- (b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

**Explanation-I:-** If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

**Explanation-II:-** If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incomplete record or for any other reason not attributing to his fault or demerit.

**Explanation-III:-** A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-à-vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

<sup>49</sup>(3) In the event of merger/restructuring of the Departments, Attached Departments or Subordinate Offices, the inter se seniority of civil servants affected by the merger/restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.

<sup>50</sup>(4) The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the

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<sup>47</sup> Substituted for the words appointment to a post in the same basic pay scale in a cadre by Notification No. SOR-I(S&GAD)4-1/80, dated 17-05-1989.

<sup>48</sup> The words inserted by Notification No. SOR-I(S&GAD)4-1/80/II, dated 04-02-1996.

<sup>49</sup> Sub-rule (3) of Rule 17 added vide Notification No. SOR-I(E&AD)4-1/80/IV, dated 28-5-2002.

<sup>50</sup> Sub-rule (4) of Rule 17 added vide Notification No. SOR-VI (E&AD) 1-3/2008 dated 19-11-2009.

2.

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

Misc. A. No. /2022

IN

S. A. No. 5725/2021

Israr Ali

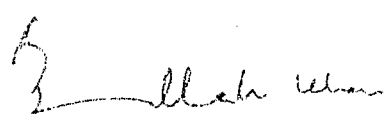
versus

PPO & Another

**INDEX**

S. No	Documents	Annex	P. No.
1.	Memo of Application		1
3.	Notification for promotion	"A"	2-3

Through Appellant

  
Saadullah Khan Marwat  
Advocate.  
21-A Nasir Mansion,  
Shoba Bazaar, Peshawar.  
Ph: 0300-5872676

Dated: 01-02-2022

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

Misc. A. No. /2022

IN

S. A. No. 5725/2021

Israr Ali

versus

PPO &amp; Another

**APPLICATION FOR DIRECTION TO  
RESPONDENTS TO NOT MAKE PROMOTION TO  
THE POST OF ASSISTANT GRADE CLERKS TILL  
THE FINAL DISPOSAL OF THE CASE:****Respectfully Sheweth,**

1. That the subject appeal is pending disposal before this hon'ble Tribunal and is fixed for today i.e. 02-02-2022
2. That respondents initiated process of promotion to promote the private respondents to the post of Assistant Grade Clerks and if the said promotion was finalized then in such a case, applicant will be deprive and will become junior to the juniors. (Copy as annex "A")
3. That in the interest of justice, such promotion is required to be not made till the disposal of the appeal as the same would become in-fractious.

It is, therefore, most humbly requested that the application be accepted as prayed for.



Applicant

Through

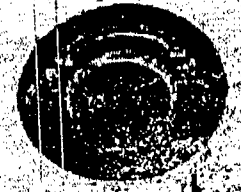
Saadullah Khan Marwat  
Advocate

Date: 01-02-2022

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

Dated Peshawar 29 October 2021  
Most Immediate Top priority

No. CPO/IB/PC/400



8149  
29.10.21

**INFORMATION REGARDING SENIOR CLERKS & STENOGRAPHERS (BPS-14) TO THE RANK OF ASST. GRADE CLERKS AND STENOGRAPHERS (BPS-16)**

As directed by the Competent Authority, a meeting of Departmental Promotion Committee will be held shortly regarding promotion of Senior Clerks & Stenotypists (BPS-14) to the rank of Asst. Grade Clerks and Stenographers (BPS-16)

It is requested that the following information of Senior Clerks & Stenotypists serving in your Region, may please be sent to this office within week time -

- i. Present posting
- ii. No Departmental Enquiry Certificate

S.NO	NAME OF SENIOR CLERKS	DATE OF BIRTH	HOME DISTRICT
1	Muhammad Aslam	18.05.1965	Bannu
2	Gul Said	06.08.1969	Kohat
3	Muhammad Shafiq	13.08.1966	Peshawar
4	Ibrar Hussain	12.10.1968	Kohat
5	Muhammad Abid-1	25.03.1969	Bannu
6	Imdad Hussain Shih	01.01.1969	Swabi
7	Muhammad Shoaib	08.05.1964	Bannu
8	Sibghatullah-1	01.04.1969	Peshawar
9	Ajmal Khan	02.01.1971	Manshera
10	Muhammad Bashir-II	18.01.1972	Bannu
11	Muhammad Younis	14.06.1970	DIKhan
12	Shoukat Ali	04.05.1972	Nowshera
13	Zikra Khan	01.04.1966	Buner
14	Raj Malook	29.02.1965	Charsadda
15	Gul Karim	10.04.1965	Kohat
16	Shahid Mehmood	01.04.1970	Buner
17	Noor-Ul-Arfeen	16.05.1971	Charsadda
18	Ikhram-Ul-Haq	01.04.1972	Peshawar
19	Shahid Ali	15.03.1971	Swat
20	Sardar Ali	21.02.1971	Karak
21	Wahid uz Zaman		

