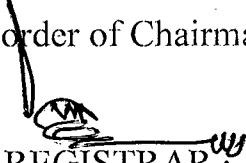


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1537/2022

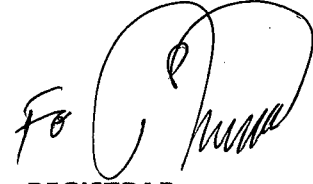
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/10/2022	<p>The appeal of Mr. Rizwan Habib resubmitted today by Mr. Faraz Ahmad Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____.</p> <p>Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Rizwan Habib son of Habib ur Rehman Acting S.P Elite Force Hazara Region A.Abad received today i.e. on 12.10.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- Addresses of respondents no.6 to 55 are incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 2802 /S.T,

Dt. 12/10 /2022

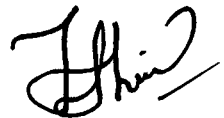


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Faraz Ahmed Adv. A.Abad

Respected Sir,

As Respondants number 6 to 55 are police officials of DSP Rank are serving under the respondent number 2 at different stations of Khyber Pakhtunkhwa and their appellant is unaware of their current places of posting. These respondents may kindly be served through respondent No 2 as is mentioned in the appeal.

Through 

Faraz Ahmed Adv HC
Abbottabad.

Sir,

The objection of this office and reply of counsel for the appellant is submitted for order please.

NO:2818/ST
Dated 14-10-2022

Humble Chaw-cum

Regretted


14/10/22

Registrar


25/10/22

Returned to counsel

13/10/22

Respected Sirs,

All objection are removed

Through John

Fazal Ahmed Advocate

High Court A.T.D

25/10/2022

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1537 /2022

Rizwan Habib son of Habib ur Rehman, presently serving as Acting Superintendent of Police Elite Force, Hazara Region, Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Memo of Appeal	1 to 11	
2.	Copy of notification No. 21319/E-H dated 29.07.2008	12	"A"
3.	Copy of the Notification dated 31.10.2013	13-14	"B"
4.	Copy of Notification dated 12.09.2014	15	"C"
5.	Copy of revised seniority list	16-25	"D"
6.	Copy of the representation filed by the appellant	26-27	"E"
7.	Copies of letter No. 924 dated 05.07.2022 and letter No. 16493/E dated 06.07.2022	28-29	"F" & "G"
8.	Copy of application and letter No. 21922/E dated 08.09.2022	30-31	"H" & "I"
9.	Wakalatnama	32	

...APPELLANT

Dated: 12/10 /2022

Through

(FARAZ AHMED)

Advocate High Court, Abbottabad

0321-9814650

adv.faraz@gmail.com

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1537 /2022

Rizwan Habib son of Habib ur Rehman, presently serving as Acting Superintendent of Police Elite Force, Hazara Region, Abbottabad.

!...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar.
2. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar
3. Additional IGP Establishment for Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
4. Additional IGP Headquarters for Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
5. Regional Police Officer Hazara Region, Abbottabad.
6. Mr. Murad Ali, serving as DSP at District Bannu.
7. Mr. Ali Gohar, serving as DSP Special Branch Headquarter Peshawar.
8. Mr. Habib ur Rehman, serving as DSP Investigation Mansehra.
9. Mr. Waqar Ahmed, serving as SP at CCPO, Peshawar.
10. Mr. Abdul Salam Khalid, serving as Acting SP City CCPO, Peshawar.
11. Mr. Sajjad Hussain, serving as acting SP CTD Peshawar.
12. Muhammad Tahir Shah, serving as Acting SP CTD Malakand.
13. Mr. Safdar Khan, serving as A.D Anticorruption, Sawat.
14. Mr. Hidayat Ullah Shah, serving as DSP CTD, Head Quarters Peshawar.
15. Mr. Shakeel Ahmad, serving as acting SP Investigation CCPO Peshawar.

16. Mr. Khan Khel, serving as acting SP Investigation, District Upper Sawat.
17. Mr. Muhammad Saeed, serving as Acting SP Traffic, Peshawar.
18. Mr. Rasheed Iqbal, serving as Acting SP CTD, Headquarter, Peshawar.
19. Mr. Muhammad Fayaz, serving as acting SP Investigation, Swabi.
20. Ms. Aneela Naz, serving as DSP Traffic, Peshawar.
21. Ms. Asmat Ara, serving as DSP Police Lines, Peshawar.
22. Mrs. Shazia Shahid, serving as DSP Highways, Peshawar.
23. Mr. Mujeeb ur Rehman, serving as acting SP Investigation, Haripur.
24. Mr. Nisar Muhammad, serving as acting SP FRP Dera Ismail Khan.
25. Mr. Rehmat Ullah, serving as acting SP FRP Police Lines, Peshawar.
26. Mr. Mustafa Kamal Pasha, serving as DSP Special Branch Headquarters, Peshawar.
27. Mr. Azmat Ali Khan, serving as DSP Headquarters, Kohat.
28. Mr. Shabir Hussain Shah, serving as acting SP Investigation D.I Khan.
29. Arbab Shafiullah Jan, serving as DPO Kurrum, District Kurrum.
30. Mr. Rafiullah, serving as DSP PTS Shah Kas Khyber.
31. Muhammad Atiq Shah, serving as acting SP Traffic, Peshawar.
32. Mr. Yasir Aman, serving as acting SP Investigation Tank.
33. Mr. Naseer Ali, serving as A.D Anticorruption, Peshawar.
34. Mr. Murad Ali, serving as acting SP Elite Force, Police Lines, Peshawar.
35. Mr. Aurang Zeb, serving as DSP Circle, Battagram.
36. Mr. Sajjad Haider, serving as DSP CTD, Haripur.
37. Mr. Muhammad Ilyas, serving DSP CCPO, Peshawar.
38. Mr. Arshad Khan, serving as acting SP Investigation, Sawat.
39. Ms. Nazia Naureen, serving as DSP Women Police Lines, Abbottabad.
40. Mrs. Shahzadi Noshad, serving as DSP Traffic, Haripur.
41. Mr. Alamzeb, serving as SDPO Faqirabad, Peshawar.

42. Mr. Aqiq Hussain, serving as acting SP Investigation, Shangla.
43. Mr. Falak Nawaz, serving as DSP Headquarters, Hangu.
44. Mr. Mazhar Jehan, serving as DSP CTD Hangu.
45. Mr. Khalid Usman, DSP retired.
46. Mr. Asad Zubair, serving as acting SP Elite Force, Malakand, Sawat.
47. Mr. Muhammad Riaz, serving as acting SP CCPO, Peshawar.
48. Mr. Zafar Khan, serving as acting SP FRP Malakand, Sawat.
49. Mrs. Rozia Altaf, serving as DSP CCPO, Peshawar.
50. Ms. Hamida Bano, serving as DSP FRP, Peshawar.
51. Mr. Muhammad Ismail, serving as DSP Norang, District Laki Marwat.
52. Mr. Mehmood Nawaz, serving as DSP FRP D.I Khan.
53. Mr. Muhammad Sattar Khan, serving as acting SP Investigation, Chitral.
54. Mr. Muhammad Zaman, serving as Acting SP Investigation, South Waziristan.
55. Mr. Riaz Muhammad, serving as DSP Daggar, District Bunner.

...RESPONDENTS

APPEAL UNDER SECTION 04 OF KHYBER
 PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
 IMPUGNING THE REVISED SENIORITY LIST OF
 DSSP BS-17 OF KHYBER PAKHTUNKHWA POLICE
 NO. 1335/SE-I DATED 28.06.2022, IN WHICH
 APPELLANT IS PLACED AT SERIAL NO. 116

INSTEAD OF AT SERIAL NO. 66, WHICH IS PERVERSE, DISCRIMINATORY AND BASED ON MALAFIDE INTENTIONS.

PRAYER:- ON ACCEPTANCE OF THE INSTANT APPEAL, IMPUGNED SENIORITY LIST NO. 1335/SE-I DATED 28.06.2022 MAY GRACIOUSLY BE DECLARED NULL AND VOID AND RESPONDENTS MAY BE DIRECTED TO PLACE THE NAME OF APPELLANT AT SERIAL NO. 66 INSTEAD OF AT SERIAL NO. 116 IN SENIORITY LIST. IT IS FURTHER PRAYED THAT RESPONDENTS MAY BE DIRECTED TO ISSUE REVISED SENIORITY LIST AFTER PLACING THE APPELLANT AT SERIAL NO. 66. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY GRACIOUSLY BE ALLOWED.

Respectfully Sheweth;-

The appellant beg to solicit through this service appeal on the following legal and factual grounds;-

1. That appellant is serving in Police Department as DSP BS-17 and is posted as Acting Superintendent of Police Elite Force Hazara Region, Abbottabad.
2. That the appellant was promoted as Officiating Inspector on 29.07.2008 vide Notification No. 21319/E-H with his other colleagues. Copy of notification No. 21319/E-H dated 29.07.2008 is annexed as Annexure "A".
3. That the appellant was confirmed as Inspector vide Notification No. 27288/E-II dated 31.10.2013 with immediate effect. Copy of the Notification dated 31.10.2013 is annexed as Annexure "B".
4. That the appellant was promoted to the rank of Deputy Superintendent of Police BS-17 on regular basis with immediate effect vide Notification No. 1092/E-II dated 12.09.2014. Copy of Notification dated 12.09.2014 is annexed as Annexure "C".
5. That the respondent No. 3 issued impugned seniority list of DSsP BS-17 of Khyber Pakhtunkhwa Police vide No. 1355/SE-I, dated

28.06.2022, wherein the appellant has been placed at serial No. 116 instead of serial No. 66. Copy of revised seniority list is annexed as Annexure "D".

6. That the appellant feeling aggrieved filed departmental appeal through proper channel before respondent No. 2 with the prayer that appellant be placed at serial No. 66 of the seniority list as name of the appellant has wrongly been placed at serial No. 116. Copy of the representation filed by the appellant is annexed as Annexure "E".
7. That the representation filed by appellant was properly submitted through respondent No. 5. In this respect letter No. 924 dated 05.07.2022 and letter No. 16493/E dated 06.07.2022 are annexed as Annexure "F" & "G" respectively.
8. That after waiting for a long time of the decision upon the representation forwarded by appellant, the appellant submitted another application for provision of copy of the decision if any upon his representation. Copy of application and letter No. 21922/E dated 08.09.2022 are annexed as Annexure "H" & "I".

9. That after the impugned seniority list and during pendency of representations of the appellants, respondent No. 3 issued another final seniority list of DSsP BS-17 of Khyber Pakhtunkhwa Police No. 1594/SE-I dated 05.08.2022, in which name of the appellant is placed at serial No. 115 instead of serial No. 64 which is again illegal, unlawful, against the law and consequently both the seniority lists are liable to be rectified.
10. That feeling aggrieved from the impugned seniority list dated 28.06.2022, the appellant approaches this Honourable Tribunal for redressal of his grievances inter-alia on the following grounds:-

GROUND:

- a. That the impugned seniority list is against the law, perverse, discriminatory and the seniority lists dated 05.08.2022 and 28.06.2022 are liable to be rectified after placing name of appellant at serial No 66 instead of at serial No. 116.

- b. That, as may be seen, the confirmation of the appellant on the post of DSsP was given with effect from the notifications No. 1092/E-II dated 12.09.2014, therefore, the respondents authorities fell in grave error by not calculating the stated length of unblemished and meritorious service of the appellant and thus justified his relegation from serial No. 66 of the seniority list to a much, much lower position crating a precise difference of about 40 members, which indeed is an irreparable loss to the appellant most specially when his remaining length of service is kept in view. The appellant shall suffer tremendously and unjustly due to irrational and illegal seniority list impugned herein.
- c. That impugned seniority list is against the law and facts, hence liable to be rectified.
- d. That, impugned seniority list is illegal, void-ab-initio, having no legal effects, hence liable to be rectified/ reconciled after placing

record of the appellant and respondents in juxtapose to each other.

- e. That the appellant is duly qualified as per his actual due seniority as well as professional skills to have been placed at serial number 66 of the impugned seniority list and to be promoted along with other colleagues from date of his confirmation.
- f. That, while placing the name of appellant at serial Nos. 116, the official respondents ignored the effect of notifications in respect of the promotions of the appellant on the post of DSsP, which is gross negligence on the part of the respondents and violation of fundamental rights of appellant.
- g. That the other grounds shall be agitated during the course of arguments with kind permission of this Honourable Tribunal.
- h. That the instant appeal is well within time.

It is, therefore, humbly prayed from this Honourable Tribunal that on acceptance of the instant appeal, impugned seniority list No. 1335/SE-I dated 28.06.2022 may graciously be declared null and void and respondents may be directed to place the name of appellant at serial No. 66 instead of at serial No. 116 in seniority list. It is further prayed that respondents may be directed to issue revised seniority list after placing the appellant at serial No. 66. Any other relief which this Honourable Tribunal deems fit and appropriate in the circumstances of the case may graciously be allowed

Dated: 12/10 /2022

Through


...APPELLANT


(FARAZ AHMED)

Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


...APPELLANT

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____ /2022

Rizwan Habib son of Habib ur Rehman, presently serving as Acting Superintendent of Police Elite Force, Hazara Region, Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Rizwan Habib son of Habib ur Rehman, presently serving as Acting Superintendent of Police Elite Force, Hazara Region, Abbottabad*, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.



...DEPONENT

No. 21319 /E-II

PROMOTION LIST-F AND PROMOTION AS INSPECTORS:-

In continuation to this office Notification No. 13023/E-II dated: 26.05.2008, No. 20332-40/E-II dated: 17.07.2008 & No. 20316-31/E-II dated: 17.07.2008.

The names of the following confirmed Sub Inspectors of the District noted against each have been approved as per recommendation of the DPC for inclusion in list for promotion to the rank of Offg. Inspectors BPS-16 (5050-390-16750) conditionally with their colleagues. They will be reverted back to their substantive rank in case their out standing ACRs for the two years are not received satisfactory within six months.

S/No	Name & Number	Home District
1.	SI Zahir ur Rehman No. H/86	Shangla
2.	SI Rizwan Habib No. H/88	Manshra
3.	SI Jehanzeb No. H/43	Manshra
4.	SI Muhammad Yousaf No. H/93	Manshra
5.	SI Aslam Pervez No. H/90	Manshra
6.	SI Muhammad Aleem Jan No. P/66	Charsadda
7.	SI Syed Jamal Akhtar Shah No. P/76	Peshawar

Their promotion will take effect from the date they actually take over charge of their higher responsibilities.

Necessary Gazette Notification may please be issued accordingly

Their posting order will be issued separately.



[Signature]

PIAZ AHMAD KHAN TORI
Addl. IGP/IGRs
For Provincial Police Officer,
NWFP, Peshawar

No. 21320-23 /E-II

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

1. Capital City Police Officer Peshawar.
2. Deputy Inspector General of Police Hazara Region
3. Assistant Secret CPO alongwith 7 spare copies for placing in their original Character Book
4. U.O.P. File

No. 9734-35/E, dated 2-8-08.

Copy of above is forwarded to DPO Manshra for information and reporting.

ATTESTED

ANNEXURE - "A"

BETTER COPY

(12-A)

**FOR PUBLICATION IN THE NWFP POLICE GAZETTE PART-II ORDERS BY THE
PROVINCIAL POLICE OFFICER NWFP PESHAWAR.**

NOTIFICATION

No. 21319 / E-II.

Dated 29/07/2008

PROMOTION LIST-F AND PROMOTION AS OFFG INSPECTORS:-

In continuation to this office notification No.13023/E-II dated 20.05.2008 No 20332-40/E-II dated 17.07.2008 and No.20316-31/E dated 17.07.2008.

The names of the following confirmed Sub Inspectors of the District noted against each have been approved as per recommendation of the DPC for inclusion on list F and promotion to the rank of Offg: Inspection BPS-16 (5050-390-16750) conditionally with their colleagues. They will be reverted back to their substantive rank in case their outstanding ACRs for the two years are not received satisfactory within six months.

S#	Name & No.	Home District
1.	SI Zahir ur Rehman H/86	Shangla
2.	SI Rizwan Habib No.H/88	Mansehra
3.	SI Jehanzeb No.H / 43	Mansehra
4.	SI Muhammad Yousaf No.H/93	Mansehra
5.	SI Aslam Pervez No. H/90	Mansehra
6.	SI Muhammad Aleem Jan No.P/66	Charsada
7.	SI Syed Jamal Akhtar Shah No.P/76	Peshawar

Their promotion will take effect from the date, they actually take over charge of their higher responsibilities.

Necessary Gazette Notification may please be issued accordingly.

Their posting order will be issued separately.

(FIAZ AHMED KHAN TORU)
Addl: IGP/HQRs
For Provincial Police Officer,
NEFP, Peshawar

No.21320-23 / E-II

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

1. Capital City Police Officer Peshawar.
2. Deputy Inspector General of Police Hazara Region.
3. Assistant Secret CPO alongwith 6 spare copies for placing in their original Character Roll.
4. U.O.P File.

NOTIFICATION

ANNEXURE -B

(13)

Dated: 31/10/2013

E-II,

CONFIRMATION AS INSPECTOR:-

As per recommendation of the DPC dated 14.10.2013 duly approved by the W/PPD Khyber Pakhtunkhwa the following offg: Inspectors on list "F" are hereby confirmed as Inspector with immediate effect:-

S#	NAME	HOME DISTRICT
1.	Muhammad Javed No. H/41	Manshra
2.	Khabir Muhammad No. H/01	Abbottabad
3.	Nazia Naureen No. H/02	Abbottabad
4.	Shahzadi Noshad No. H/02	Hangu
5.	Raheem Hussain no. H/85	Kohistan
6.	Amjad Hussain No. H/87	Mansehra
7.	Rizwan Habib No. H/88	Mansehra
8.	Jehangir No. H/89	Abbottabad
9.	Shamraiz Khan No. H/92	Abbottabad
10.	Muhammad Riaz No. H/38	Abbottabad
11.	Rahmat Ullah No. P/65	Nowshera
12.	Zafrullah No. K/43	Karak
13.	Aslam Pervez No. H/90	Mansehra
14.	Noor Muhammad No. D/20	Dikhan
15.	Sher Zada No. M/14	Swat
16.	Zafar Khan No. M/197	Bunir
17.	Asad Mehmood No. P/85	Loralai
18.	Fazal Raziq No. MR/58	Swabi
19.	Yousaf Ali No. M/28	Malakand
20.	Muzakir Shah No. M/185	Dir lower
21.	Mujeeb -ur- Rehman No. B/09	Bannu
22.	Mustafa Kamal Pasha No. B/20	Bannu
23.	Azmat Ali No. B/06	Bannu
24.	Waqar Ahmad No. P/101	Charsadda
25.	Sajjad Hussain No. P/103	Nowshera
26.	Yasir Aman No. P/104	Peshawar
27.	Muhammad Maroof No. H/4	Abbottabad
28.	Usman Ghani No. P/7	Peshawar

SRC

for up to date
in S-Record

Dy. Insp.

11/11/2013

ATTACHED

(14)

30.	Qeemat Ullah No. Mr/63	Mardan
31.	Muhammad Ilyas No. Mr/64	Mardan
32.	Jehanzada No. MR/65	Charsadda
33.	Naseer Ali No. P/01	Charsadda
34.	Muhammad Rouf No. MR/67	Mardan
35.	Hidayatullah Shah No. MR/62	Swabi

(KHALID MASOOD)

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

No. 27289-99/E-II, dated Peshawar the 27 / 2013

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

1. Addl: IGP/Special Branch Khyber Pakhtunkhwa Peshawar.
2. Addl: IGP/Investigation, Khyber Pakhtunkhwa Peshawar.
3. Capital City Police Officer, Peshawar.
4. All Region DisG in Khyber Pakhtunkhwa.
5. Commandant Elite Force, Khyber Pakhtunkhwa Peshawar
6. Commandant PTC Hangu.
7. Deputy Inspector General of Police, DCT/SB Khyber Pakhtunkhwa
8. Assistant Inspector General of Police, Traffic Khyber Pakhtunkhwa
9. Director Anti-Corruption Establishment Khyber Pakhtunkhwa.
10. Office Supdt: Secret: CPO Peshawar.
11. U.O.P file.

cc
ATTACHED

NOTIFICATION

Dated Peshawar, the 12/09/2014.

No. 1092/E-II. In pursuance of the provisions contained in Section-5 of the Khyber Pakhtunkhwa (Promotion of Superintendent of Police and Deputy Superintendent of Police) Rules-2007, the Competent Authority i.e Provincial Police Officer on recommendations of the Departmental Selection Committee meeting held on 01.09.2014 is pleased to promote the following Inspectors Executive (BS-16), Inspector Legal (BS-16) and Inspector FSL/FPB (BS-1) to the rank of Deputy Superintendent of Police (BS-17) on regular basis with immediate effect.

2. The officers on promotion shall remain on probation for a period of one year in terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rule 1989.

3. Their promotion will take effect from the date they actually assume the charge of higher responsibility:-

Inspectors Executive

S. No.	Name and No.
1.	Inspector Ijaz Ahmad, H/78
2.	Inspector Arshad Mehmood, H/79
3.	Inspector Noor Muhammad, K/14
4.	Inspector Ghulam Muhammad, M/173
5.	Inspector Hussain Badshah, K/20
6.	Inspector Shakil Ahmad, MR/07
7.	Inspector Muhammad Saeed, MR/39
8.	Inspector Muhammad Nawaz, H/40
9.	Inspector Khabir Muhammad, H/01
10.	Lady Inspector Nazia Naureen, H/02
11.	Lady Inspector Shahzadi Naushad, H/02
12.	Inspector Rahim Badshah, H/85
13.	Inspector Amjid Hussain, H/87
14.	Inspector Rizwan Habib, H/88
15.	Inspector Alam Zeb, H/91
16.	Inspector Muhammad Safdar, H/95

Inspectors Legal

1.	Inspector Legal Imtiaz Ali, D/27
2.	Inspector Legal Javed Ahmad, D/28
3.	Inspector Legal Ghulam Hussain, D/54

Inspector FSL/FPB

1.	Inspector FSL/FPB Muhammad Aslam Khan
----	---------------------------------------

On promotion their posting orders will be issued separately.

Sd/-
NASIR KHAN DURRANI
Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

No. 1093-1127/E-II, dated Peshawar, the 12/09/2014.

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

1. Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Govt: Khyber Pakhtunkhwa, E & AD Deptt: Peshawar.
5. Secretary Govt: Khyber Pakhtunkhwa, Finance Deptt: Peshawar.

PAE 124311

16 ANNEXURE - "D"

FAX NO. : 9310023

28 Jun 2022 8:58PM P1

2962100120 6032

(FAX)

F.001/001



OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA

No. CPO/E-II 1354

Dated Peshawar 28 June, 2022

MOST IMMEDIATE
TIME LIMIT CASE

- To : The Capital City Police Officer, Peshawar
- All Regional Police Officers, In Khyber Pakhtunkhwa
- All Head of Units in Khyber Pakhtunkhwa

Subject: **REVISED SENIORITY LIST 2022**
Memo:

I am directed to refer to the subject cited above and the revised seniority list of officers of (BS-17/DSP) Executive officers, has been issued for the year 2022 and uploaded on Khyber Pakhtunkhwa Police website.

Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within 15 days from the date of issuance, and after the issuance of this lists, otherwise no representation will be entertained after the specific period please.

(Signature)
(DR. ZAHRUL ULLAH) PSP
AIG Establishment,

For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Endst: No. & date even.

Copy forwarded to the:-

1. Additional Inspector General of Police HQrs: Khyber Pakhtunkhwa.
2. Deputy Inspector General of Police HQrs: Khyber Pakhtunkhwa.
3. PSO to IGP Khyber Pakhtunkhwa.

Let Director IT CPO Peshawar has requested to upload the seniority lists on Khyber Pakhtunkhwa Police website by today being time limit case.
Let DSP and In charge Operations Room CPO fax to all heads of Police by today please.

All DPs in HR

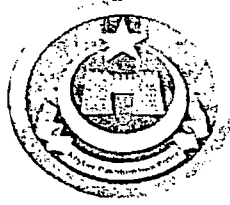
NO 15724-33/EC

for m/awh

28 - 06 - 022

AD

AT *(Signature)*



(17)

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

REVISED SENIORITY LIST OF DSsP BS-17 OF KHYBER PAHTUNKHWA POLICE

Dated: 28 / 06 / 2022

No. 1355 /SE-I, The Revised Seniority List of DSsP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
1.	Mr. Qaid Kamal	01.01.1963	Charsadda	01.01.1994	01.01.1996	07.11.2012
2.	Mr. Muhammad Aleem Jan	11.04.1967	Peshawar	30.01.1996	30.01.1998	24.01.2014
3.	Mr. Aamir Shahzad	09.08.1968	Peshawar	30.01.1996	30.01.1998	30.06.2011
4.	Mr. Muhammad Arif	10.03.1969	Peshawar	30.01.1996	30.01.1998	19.03.2012
5.	Mr. Waqar Ahmad	03.01.1968	Nowshera	01.04.1997	01.04.1999	19.03.2012
6.	Mr. Muhammad Shafiq	13.01.1963	Bannu	01.10.1997	01.10.1999	19.03.2012
7.	Mr. Muhammad Arif	22.04.1964	Bannu	01.10.1997	01.10.1999	07.11.2012
8.	Mr. Gul Naseeb	09.11.1968	Bannu	01.10.1997	01.10.1999	19.03.2012
9.	Mr. Sanaullah	10.01.1969	Lakki	01.10.1997	01.10.1999	31.03.2012
10.	Mr. Amir Muhammad Khan	07.01.1970	Buner	14.10.1997	14.10.1999	19.03.2012
11.	Mr. Ali Hassan	06.03.1965	K.Agency	28.01.1998	28.01.2000	24.08.2020
12.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	20.02.1998	20.02.2000	30.06.2011
13.	Mr. Munir Hussein	30.05.1966	Mansehra	15.04.1998	15.04.2000	07.11.2012
14.	Mr. Tahir ur Rahman	28.02.1969	Haripur	20.06.1998	20.06.2000	19.03.2012
15.	Mr. Muhammad Suleman	28.07.1970	Mansehra	20.06.1998	20.06.2000	30.06.2011
16.	Mr. Janas Khan	10.02.1965	Abbottabad	20.06.1998	20.06.2000	20.01.2011
17.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	26.05.1987	20.06.2000	25.03.2013
18.	Mr. Asad Mehmood	08.03.1968	Swabi	-	07.09.2000	24.10.2014
19.	Mr. Asif Gohar	07.08.1964	Mansehra	26.04.2000	26.04.2002	20.01.2011
20.	Mr. Tahir Iqbal	20.01.1969	Haripur	26.04.2000	26.04.2002	25.03.2013

①

ATG

18

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
21.	Mr. Khabir Muhammad	01.01.1972	Abbottabad	26.04.2000	26.04.2002	12.09.2014
22.	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	26.04.2000	26.04.2002	08.04.2016
23.	Mr. Qamar Hayat	08.04.1971	Haripur	26.04.2000	26.04.2002	07.11.2012
24.	Mr. Ijaz Ahmad	05.04.1963	Mansehra	26.04.2000	26.04.2002	12.09.2014
25.	Mr. Arshad Mehmood	15.08.1964	Mansehra	26.04.2000	26.04.2002	12.09.2014
26.	Muhammad Javed	03.06.1963	Mansehra	26.04.2000	26.04.2002	27.10.2015
27.	Mr. Falak Niaz	01.04.1965	Swabi	02.05.2000	02.05.2002	07.11.2012
28.	Mr. Tajamul Khan	30.09.1965	Swabi	03.07.2000	03.07.2002	24.01.2014
29.	Mr. Tariq Habib	05.09.1968	Peshawar	20.09.2000	20.09.2002	31.03.2012
30.	Mr. Nisar Ahmad	02.11.1973	Charsadda	20.09.2000	20.09.2002	31.03.2012
31.	Mr. Tariq Iqbal	13.04.1974	Peshawar	20.09.2000	20.09.2002	31.03.2012
32.	Mr. Aslam Nawaz	01.03.1972	Bannu	20.09.2000	20.09.2002	31.03.2012
33.	Mr. Ishtiaq Ahmad	01.11.1971	Lakki	20.09.2000	20.09.2002	07.11.2012
34.	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	29.01.2001	29.01.2003	19.07.2013
35.	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	01.06.2001	01.06.2003	25.03.2013
36.	Mr. Iftikhar Shah	30.04.1966	Mardan	02.06.2001	02.06.2003	25.03.2016
37.	Mr. Noor Jamal	10.01.1966	Mardan	31.07.2001	31.07.2003	31.03.2012
38.	Syed Mukhtiar Shah	18.10.1967	Haripur	17.11.2001	17.11.2003	24.01.2014
39.	Mr. Nazir Ahmad	02.02.1970	Abbottabad	17.11.2001	17.11.2003	07.11.2012
40.	Mr. Saeed Akhtar	02.02.1971	Haripur	17.11.2001	17.11.2003	07.11.2012
41.	Mr. Niaz Gul	07.03.1971	Abbottabad	17.11.2001	17.11.2003	24.01.2014
42.	Mr. Muhammad Ishtiaq	04.05.1973	Mansehra	17.11.2001	17.11.2003	24.01.2014
43.	Mr. Muhammad Maroof	05.10.1974	Abbottabad	17.11.2001	17.11.2003	02.04.2015
44.	Mr. Muhammad Ayaz	03.03.1975	Abbottabad	17.11.2001	17.11.2003	07.11.2012
45.	Muhammad Jamil Akhtar	22.02.1977	Haripur	17.11.2001	17.11.2003	07.11.2012
46.	Mr. Salah-ud-Din	15.01.1970	Tank	23.11.2001	23.11.2003	07.11.2012
47.	Mr. Tauheed Khan	20.10.1963	DIKhan	23.11.2001	23.11.2003	19.03.2012
48.	Mr. Niaz Muhammad	11.02.1971	Swabi	29.11.2001	29.11.2003	25.03.2013
49.	Mr. Hameed Ullah	25.04.1974	Mardan	01.12.2001	01.12.2003	24.01.2014
50.	Mr. Sajjad Ahmad	01.04.1968	Swabi	01.12.2001	01.12.2003	25.03.2013
51.	Mr. Shah Hassan	01.05.1968	Mardan	01.12.2001	01.12.2003	08.04.2013
52.	Mr. Nazir Khan	18.10.1970	Mardan	01.12.2001	01.12.2003	19.07.2013

2

AT 10/10/2013

19

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
53.	Sahibzada Sajjad Ahmad	02.02.1971	Swabi	01.12.2001	01.12.2003	08.04.2013
54.	Mr. Muzamil Shah	08.03.1972	Swabi	01.12.2001	01.12.2003	25.03.2013
55.	Mr. Mushtaq Ahmad	15.03.1970	Swabi	01.12.2001	01.12.2003	25.03.2013
56.	Mr. Shaukat Ali	05.03.1971	Swabi	01.12.2001	01.12.2003	30.11.2012
57.	Mr. Abdul Samad	14.04.1969	Swabi	01.12.2001	01.12.2003	25.03.2013
58.	Mr. Muhammad Khalid	01.01.1970	Chitral	01.12.2001	01.12.2003	24.01.2014
59.	Mr. Shafiullah	01.04.1971	DIKhan	13.12.2001	13.12.2003	07.11.2012
60.	Mr. Abdul Hai Khan	01.08.1972	D.I.Khan	24.01.2002	24.01.2004	19.07.2013
61.	Syed Inayat Ali Shah	10.01.1972	D.I.Khan	24.01.2002	24.01.2004	24.01.2014
62.	Mr. Zia Hassan	01.11.1974	DIKhan	25.01.2002	24.01.2004	02.01.2014
63.	Mr. Nasir Khan	20.12.1972	Peshawar	14.10.2002	14.10.2004	30.01.2018
64.	Mr. Rahim Hussain	11.05.1970	Shangla	17.10.2002	17.10.2004	12.09.2014
65.	Mr. Amjad Hussain	24.03.1971	Mansehra	17.10.2002	17.10.2004	12.09.2014
66.	Mr. Murad Ali	09.01.1973	Bannu	30.09.2000	30.09.2002	02.04.2015
67.	Mr. Ali Gohar	23.03.1968	K. Agency	13.01.2003	13.01.2005	02.04.2015
68.	Mr. Habib Ur Rehman	04.03.1966	Mansehra	20.02.2003	20.02.2005	30.09.2016
69.	Mr. Waqar Ahmad	12.04.1974	Charsadda	01.05.2003	01.05.2005	02.04.2015
70.	Mr. Abdus Salam Khalid	24.06.1976	Lakki	01.05.2003	01.05.2005	25.03.2016
71.	Mr. Sajjad Hussain	23.03.1976	Nowshera	23.06.2003	23.06.2005	02.04.2015
72.	Muhammad Tahir Shah	01.03.1972	Bannu	24.07.2003	24.07.2005	24.01.2014
73.	Mr. Safdar Khan	30.04.1971	Kohat	29.08.2003	29.08.2005	02.04.2015
74.	Mr. Hidayat Ullah Shah	20.04.1965	Swabi	20.12.2003	20.12.2005	25.03.2016
75.	Mr. Shakeel Ahmad	14.04.1969	Charsadda	20.12.2003	20.12.2005	12.09.2014
76.	Mr. Khan Khel	10.04.1969	Mardan	20.12.2003	20.12.2005	24.01.2014
77.	Mr. Muhammad Saeed	04.05.1969	Mardan	20.12.2003	20.12.2005	12.09.2014
78.	Mr. Rasheed Iqbal	15.01.1974	Mardan	20.12.2003	20.12.2005	25.03.2016
79.	Mr. Muhammad Fayaz	07.03.1974	Mardan	20.12.2003	20.12.2005	25.03.2016
80.	Ms. Aneela Naz	09.10.1971	Peshawar	01.01.2004	01.01.2006	02.04.2015
81.	Ms. Asmat Ara	15.04.1975	Swabi	01.01.2004	01.01.2006	02.04.2015
82.	Mrs. Shazia Shahid	30.04.1976	Charsadda	01.01.2004	01.01.2006	02.04.2015
83.	Mr. Mujeeb Ur Rehman	02.04.1969	Bannu	08.04.2004	08.04.2006	02.04.2015

④

ATK

20

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
84.	Mr. Nisar Muhammad	20.01.1973	Lakki	17.04.2004	17.04.2006	24.01.2014
85.	Mr. Rahmat Ullah	05.03.1971	Nowshera	31.05.2004	31.05.2006	24.10.2014
86.	Mr. Mustafa Kamal Pasha	01.09.1969	Bannu	07.10.2004	07.10.2006	02.04.2015
87.	Mr. Azmat Ali Khan	06.01.1970	Bannu	07.10.2004	07.10.2006	02.04.2015
88.	Mr. Shabir Hussain Shah	15.06.1972	Lakki	07.10.2004	07.10.2006	18.08.2015
89.	Arbab Shafiullah Jan	09.10.1966	Peshawar	22.11.2004	22.11.2006	02.01.2014
90.	Mr. Rafiullah	12.03.1968	Peshawar	22.11.2004	22.11.2006	02.01.2014
91.	Muhammad Atiq Shah	01.09.1978	Charsadda	22.11.2004	22.11.2006	06.02.2014
92.	Mr. Yasir Aman	11.08.1970	Peshawar	22.11.2004	22.11.2006	02.04.2015
93.	Mr. Naseer Ali	03.10.1975	Charsadda	22.11.2004	22.11.2006	30.09.2016
94.	Mr. Murad Ali	13.04.1965	Charsadda	22.11.2004	22.11.2006	15.11.2016
95.	Mr. Aurang Zeb	05.01.1970	Mansehra	04.12.2004	04.12.2006	30.09.2016
96.	Mr. Sajjad Haider	20.04.1970	Abbottabad	04.12.2004	04.12.2006	15.11.2016
97.	Mr. Muhammad Ilyas	01.04.1973	Mardan	07.12.2004	07.12.2006	18.08.2015
98.	Mr. Arshad Khan	30.05.1974	Peshawar	08.12.2004	08.12.2006	07.03.2017
99.	Ms. Nazia Naureen	01.12.1970	Abbottabad	09.12.2004	09.12.2006	12.09.2014
100.	Mrs. Shahzadi Noshad	10.04.1972	Hangu	09.12.2004	09.12.2006	12.09.2014
101.	Mr. Alamzeb	12.02.1980	Mardan	23.12.2004	23.12.2006	24.10.2014
102.	Mr. Aqiq Hussain	01.04.1965	Kohat	10.01.2005	10.01.2007	18.08.2015
103.	Mr. Falak Nawaz	03.02.1969	Kohat	10.01.2005	10.01.2007	25.03.2016
104.	Mr. Mazhar Jehan	12.12.1970	Kohat	10.01.2005	10.01.2007	24.08.2020
105.	Mr. Khalid Usman	06.01.1967	Karak	10.01.2005	10.01.2007	18.08.2015
106.	Mr. Asad Zubair	15.01.1980	Kohat	10.01.2005	10.01.2007	29.11.2018
107.	Mr. Muhammad Riaz	13.08.1973	Karak	10.01.2005	10.01.2007	24.08.2020
108.	Mr. Zafar Khan	10.01.1963	Buner	16.04.2005	16.04.2007	24.10.2014
109.	Mrs. Rozia Altaf	30.07.1969	Peshawar	13.05.2005	13.05.2007	02.04.2015
110.	Ms. Hamida Bano	04.12.1970	Peshawar	13.05.2005	13.05.2007	02.04.2015
111.	Mr. Muhammad Ismail	12.01.1966	Lakki	07.06.2005	07.06.2007	25.03.2016
112.	Mr. Mehmood Nawaz	07.03.1974	Lakki	02.07.2005	02.07.2007	30.01.2018
113.	Mr. Muhammad Sattar Khan	04.04.1964	Chitral	13.07.2005	13.07.2007	25.03.2016

3

ATTESTED

(21)

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
114.	Mr. Muhammad Zaman	01.01.1965	Buner	13.07.2005	13.07.2007	25.03.2016
115.	Mr. Riaz Muhammad	10.12.1962	Swabi	13.07.2005	13.07.2007	15.11.2016
116.	Mr. Rizwan Habib	19.04.1974	Mansehra	28.12.2005	28.12.2007	12.09.2014
117.	Mr. Jehangir Khan	10.11.1965	Abbottabad	28.12.2005	28.12.2007	24.10.2014
118.	Mr. Shah Mumtaz	20.02.1965	Dir Lower	27.05.2006	27.05.2008	30.01.2018
119.	Mr. Zahoor Ahmed	01.01.1980	Dir Lower	27.05.2006	27.05.2008	24.08.2020
120.	Mr. Zafar Ahmad	10.01.1979	Chitral	27.05.2006	27.05.2008	30.01.2018
121.	Mr. Farmanullah	27.10.1978	Dir Lower	27.05.2006	27.05.2008	30.01.2018
122.	Mr. Wahid Ullah	01.04.1981	Dir Lower	27.05.2006	27.05.2008	24.08.2020
123.	Mr. Iftikhar Ali Shah	11.05.1976	Bannu	25.08.2006	25.08.2008	15.11.2016
124.	Mr. Amir Hussain	25.05.1965	Swabi	07.11.2006	07.11.2008	30.09.2016
125.	Mr. Sher Afsar	09.02.1963	Swabi	23.11.2006	23.11.2008	29.11.2018
126.	Mr. Muhammad Rauf	04.04.1963	Mardan	23.11.2006	23.11.2008	25.03.2016
127.	Mr. Rokhan Zeb	07.04.1965	Swabi	18.04.2007	18.04.2009	25.03.2016
128.	Mr. Janzada	01.04.1963	Charsadda	16.07.2007	16.07.2009	25.03.2016
129.	Mr. Zahid Khan	08.04.1967	Mkd. Agency	20.10.2007	20.10.2009	29.11.2018
130.	Mr. Badshah Hazrat	15.02.1969	Dir Lower	20.10.2007	20.10.2009	29.11.2018
131.	Mr. Naveed Iqbal	13.03.1981	Swat	20.10.2007	20.10.2009	29.11.2018
132.	Mr. Ajmal Khan	15.05.1982	Mkd: Agency	20.10.2007	20.10.2009	16.05.2019
133.	Mr. Atiq-ur-Rehman	01.11.1981	Chitral	20.10.2007	20.10.2009	24.08.2020
134.	Mr. Shahid Adnan	27.03.1973	D.I.Khan	03.11.2007	03.11.2009	30.01.2018
135.	Mr. Muhammad Saleem Tariq	01.03.1969	DIKhan	03.11.2007	03.11.2009	29.11.2018
136.	Mr. Gul Shid Khan	01.06.1980	Charsadda	04.11.2007	04.11.2009	30.01.2018
137.	Mr. Shaheen Shah Gohar	03.03.1971	Charsadda	24.11.2007	24.11.2009	07.03.2017
138.	Mr. Gohar Ali	15.11.1974	Peshawar	19.12.2007	19.12.2009	30.09.2016
139.	Mr. Riaz Khan	03.02.1975	Peshawar	19.12.2007	19.12.2009	30.09.2016
140.	Mr. Fazal Wahid	12.01.1971	Malakand	19.12.2007	19.12.2009	30.09.2016
141.	Mr. Amjid Ali	24.04.1969	Swabi	14.03.2008	14.03.2010	30.09.2016
142.	Mr. Izhar Shah	06.03.1966	Mardan	26.03.2008	26.03.2010	30.09.2016
143.	Mr. Sher Rehman	05.04.1964	Mardan	03.04.2008	03.04.2010	15.11.2016

(S)

ATTESTED

22

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
144.	Mr. Jamil-ur-Rehman	16.04.1974	Abbottabad	07.01.2002	-	12.03.2018
145.	Mr. Muhammad Iqrar	11.02.1963	Mansehra	08.04.2008	08.04.2010	16.05.2019
146.	Mr. Shah Nawaz	06.06.1967	Mansehra	08.04.2008	08.04.2010	24.08.2020
147.	Mr. Muhammad Khurshid	12.01.1963	Mansehra	08.04.2008	08.04.2010	07.03.2017
148.	Mr. Muhammad Altaf	12.03.1969	Haripur	08.04.2008	08.04.2010	30.09.2016
149.	Mr. Fazal Wahid	01.12.1968	Mardan	19.04.2008	19.04.2010	29.11.2018
150.	Mr. Muslim Khan	16.02.1970	Mardan	21.04.2008	21.04.2010	30.01.2018
151.	Mr. Muhammad Saddique	16.11.1968	Abbottabad	21.04.2008	21.04.2010	30.01.2018
152.	Mr. Faqir Hussain	02.02.1967	Peshawar	21.04.2008	21.04.2010	29.11.2018
153.	Mr. Naseer Khan	01.04.1963	Charsadda	21.04.2008	21.04.2010	15.11.2016
154.	Mr. Hukam Khan	14.03.1969	Charsadda	21.04.2008	21.04.2010	30.01.2018
155.	Mr. Arab Nawaz	11.02.1969	Charsadda	21.04.2008	21.04.2010	15.11.2016
156.	Mr. Mehar Ali	01.01.1969	Nowshera	21.04.2008	21.04.2010	30.01.2018
157.	Mr. Yar Nawab	05.11.1963	Mardan	21.04.2008	21.04.2010	30.01.2018
158.	Mr. Iftikhar Ali	10.02.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018
159.	Mr. Nasir Khan	22.11.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018
160.	Mr. Hazrat Ullah	05.01.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018
161.	Mr. Fazal Dad	16.03.1966	Charsadda	21.04.2008	21.04.2010	16.05.2019
162.	Mr. Abdullah Jan	24.10.1963	Peshawar	21.04.2008	21.04.2010	18.02.2022
163.	Mr. Liaqat Ali	08.04.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018
164.	Mr. Tayyab Jan	01.05.1970	Charsadda	21.04.2008	21.04.2010	30.01.2018
165.	Mr. Asif Mehmood	25.04.1975	Bannu	04.07.2008	04.07.2010	18.02.2022
166.	Mr. Ghulam Sadiq	01.02.1968	Mkd: Agency	05.08.2008	05.08.2010	16.05.2019
167.	Mr. Roshan Zeb	16.02.1964	Mardan	26.08.2008	26.08.2010	30.01.2018
168.	Mr. Fazal Subhan	02.05.1968	Nowshera	26.08.2008	26.08.2010	30.01.2018
169.	Mr. Muhammad Ijaz Khan	01.09.1977	Charsadda	26.08.2008	26.08.2010	15.11.2016
170.	Mr. Muhammad Yaseen	30.03.1975	Charsadda	10.09.2008	10.09.2010	15.11.2016
171.	Mr. Ibrar Khan	20.05.1970	Abbottabad	19.09.2008	19.09.2010	15.11.2016
172.	Mr. Muhammad Yaseen	28.12.1973	Haripur	19.09.2008	19.09.2010	07.03.2017
173.	Mr. Iftikhar Ahmad	10.05.1968	Mansehra	19.09.2008	19.09.2010	14.03.2017

6

ATTENDED

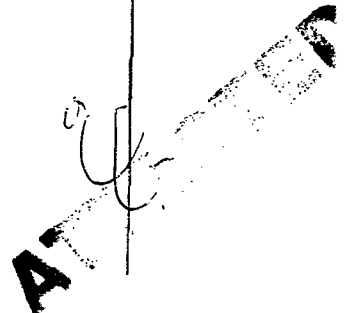
Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
174.	Mr. Farhad Ali	16.11.1962	Mardan	19.09.2008	19.09.2010	16.05.2019
175.	Mr. Zakir Hussain	09.03.1966	Abbottabad	19.09.2008	19.09.2010	30.01.2018
176.	Mr. Azam Ali Shah	01.01.1963	Abbottabad	19.09.2008	19.09.2010	16.05.2019
177.	Mrs. Samina Zafar	25.12.1975	Haripur	19.09.2008	19.09.2010	07.03.2017
178.	Mr. Mehboob	16.12.1965	Abbottabad	19.09.2008	19.09.2010	07.03.2017
179.	Mr. Muhammad Hamayun	01.04.1963	Abbottabad	19.09.2008	19.09.2010	30.01.2018
180.	Mr. Ghulam Muhammad	01.11.1963	Mansehra	19.09.2008	19.09.2010	30.01.2018
181.	Mr. Zahoor-Ud- Din Khan	05.05.1963	D.I.Khan	03.12.2008	03.12.2010	15.11.2016
182.	Mr. Muhammad Nabi	09.10.1966	Charsadda	30.12.2008	30.12.2010	30.01.2018
183.	Mr. Ayaz Mehmood	20.02.1971	Mardan	30.12.2008	30.12.2010	30.01.2018
184.	Mr. Shakeel Ahmed	01.01.1974	Peshawar	29.01.2009	-	30.12.2019
185.	Mr. Hussain Ghulam	10.03.1970	Hangu	28.07.2009	28.07.2011	16.05.2019
186.	Mr. Muhammad Akbar	14.05.1963	Mardan	11.08.2009	11.08.2011	18.02.2022
187.	Mr. Zareef Khan	01.01.1969	Swabi	11.08.2009	11.08.2011	18.02.2022
188.	Mr. Bashir Dad	14.04.1972	Mardan	28.08.2009	28.08.2011	30.01.2018
189.	Mr. Arshad Hussain	15.05.1967	Shangla	28.08.2009	28.08.2011	16.05.2019
190.	Mr. Matloob Khan	13.04.1970	Haripur	28.08.2009	28.08.2011	24.08.2020
191.	Mr. Shah Nawaz	08.08.1965	Mansehra	28.08.2009	28.08.2011	30.09.2016
192.	Mr. Fazal Wahab	15.01.1965	Mardan	28.08.2009	28.08.2011	24.08.2020
193.	Mr. Jehanzeb Khan	30.11.1966	Abbottabad	28.08.2009	28.08.2011	24.08.2020
194.	Mr. Muhammad Amin	06.09.1962	Abbottabad	28.08.2009	28.08.2011	18.02.2022
195.	Mr. Muhammad Sohail	30.04.1977	Mansehra	28.08.2009	28.08.2011	19.04.2022
196.	Mr. Muhammad Yousaf	24.08.1964	Haripur	13.10.2009	13.10.2011	24.08.2020
197.	Mr. Muhammad Sajjad	24.03.1969	Mansehra	13.10.2009	13.10.2011	24.08.2020
198.	Mr. Fida Muhammad	11.12.1964	Abbottabad	13.10.2009	13.10.2011	24.08.2020
199.	Mr. Alam Zeb	10.11.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
200.	Mr. Saeed Khan	15.04.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
201.	Mr. Muhammad Ishaq	21.12.1968	Nowshera	18.11.2009	18.11.2011	16.05.2019
202.	Mr. Pasham Gul	29.04.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
203.	Mr. Nasrullah Khan	20.04.1968	Peshawar	18.11.2009	18.11.2011	18.02.2022

ATTESTED

24

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
204.	Mr. Janan Habib	16.05.1964	Charsadda	18.11.2009	18.11.2011	24.08.2020
205.	Mr. Amir Nawaz	20.03.1970	Charsadda	18.11.2009	18.11.2011	29.11.2018
206.	Mr. Afsar Zaman	01.09.1969	Mardan	18.11.2009	18.11.2011	29.11.2018
207.	Mr. Rajab Ali	09.02.1975	Kohat	18.11.2009	18.11.2011	24.08.2020
208.	Mr. Noor Ullah	10.05.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
209.	Mr. Mukhtiar Ahmad	03.12.1964	Charsadda	18.11.2009	18.11.2011	30.01.2018
210.	Mr. Muhammad Irfan	01.08.1970	Karak	12.07.1997	12.07.1999	16.05.2019
211.	Mr. Arshad Ahmed	06.01.1982	Nowshera	01.01.2010	01.01.2012	24.08.2020
212.	Mr. Muhammad Kamran	12.02.1981	Malakand	01.01.2010	01.01.2012	18.02.2022
213.	Mr. Sajid Mumtaz	27.12.1979	Charsadda	01.01.2010	01.01.2012	18.02.2022
214.	Mr. Fida Hussain	21.01.1983	Peshawar	01.01.2010	01.01.2012	18.02.2022
215.	Mr. Ijaz Ali	10.04.1983	Charsadda	01.01.2010	01.01.2012	18.02.2022
216.	Mr. Zaka Ullah	01.10.1965	Nowshera	01.01.2010	01.01.2012	18.02.2022
217.	Mr. Ali Khan	20.02.1968	Mkd Agency	01.01.2010	01.01.2012	24.08.2020
218.	Mr. Abdur Rashid	03.05.1968	Charsadda	01.01.2010	01.01.2012	29.11.2018
219.	Mr. Khalid Khan	02.01.1969	Nowshera	01.01.2010	01.01.2012	29.11.2018
220.	Mr. Niaz Muhammad	14.09.1973	Charsadda	01.01.2010	01.01.2012	29.11.2018
221.	Mr. Tauheed Ullah	08.04.1982	Charsadda	01.01.2010	01.01.2012	29.11.2018
222.	Mr. Ijaz Ali	14.05.1978	Charsadda	01.01.2010	01.01.2012	18.02.2022
223.	Mr. Adnan Azam	16.06.1984	Charsadda	01.01.2010	01.01.2012	18.02.2022
224.	Mr. Zahid Alam	15.07.1987	Peshawar	01.01.2010	01.01.2012	18.02.2022
225.	Mr. Rehmattullah	07.03.1986	Peshawar	01.01.2010	01.01.2012	18.02.2022
226.	Mr. Taj Muhammad Khan	13.02.1979	Nowshera	01.01.2010	01.01.2012	18.02.2022
227.	Mr. Muhammad Inam Jan	15.03.1979	Mardan	20.03.2010	20.03.2012	18.02.2022
228.	Mr. Luqman Khan	15.01.1980	Mardan	20.03.2010	20.03.2012	18.02.2022
229.	Mr. Ikhtiraz Khan	14.01.1985	Mardan	20.03.2010	20.03.2012	18.02.2022
230.	Pir Zar Badshah	25.05.1972	Mkd Agy	20.03.2010	20.03.2012	18.02.2022
231.	Mr. Muhammad Fazil	03.12.1978	Swabi	20.03.2010	20.03.2012	18.02.2022
232.	Mr. Imtiaz Ali	03.01.1977	Mardan	20.03.2010	20.03.2012	18.02.2022
233.	Mr. Sabir Gul	04.03.1984	Mardan	20.03.2010	20.03.2012	18.02.2022


(8)

AT


25

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
234.	Mr. Azmat Ali	01.04.1978	Kohat	11.07.2010	11.07.2012	18.02.2022
235.	Mr. Sadat Khan	06.04.1983	Kohat	24.08.2010	24.08.2012	18.02.2022
236.	Mr. Fazal Hanif	01.01.1974	Karak	24.08.2010	24.08.2012	18.02.2022
237.	Mr. Nazar Hussain	10.01.1975	Hangu	24.08.2010	24.10.2012	18.02.2022
238.	Mr. Muhammad Yousaf	10.04.1975	Karak	24.08.2010	24.08.2012	18.02.2022
239.	Mr. Nazir Khan	02.04.1977	Kohat	24.08.2010	24.08.2012	18.02.2022
240.	Mr. Abid Khan	01.03.1979	Kohat	24.08.2010	24.08.2012	18.02.2022
241.	Mr. Umar Hayat	01.02.1984	Karak	24.08.2010	24.08.2012	18.02.2022

NOTE:- Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within 15 Days after the issuance of this list, otherwise no representation will be entertained after the specific period.


(DR. ZAHID ULLAH) ^{PSP} 9
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Endst: No. & date even.

Copy to all concerned

ATTESTED

To:

The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

(26)

Through:

PROPER CHANNEL

ANNEXURE - "E"

Subject:

REPRESENTATION AGAINST SENIORITY LIST OF DSPs.

Respected sir,

Kindly refer to your office letter No.1354/E-I, dated 28-06-2022 regarding revised seniority list of DSsP in the year 2022.

It is humbly requested that my seniority is affected during revision of new seniority list of 2022.

My requests are as under:-

- That if the seniority should be fixed/ revised in regional level then seniority start from promotion of ASI or appointment of ASIs and if the seniority revised in CPO level then seniority list should be revised from List "F" between both revisions of seniority is injustice.
- Promotion of ASI and appointment through PCS of ASI on the same date the promotee is senior to ASI who directly appointed, according to Police Rules 12.2 (3) and decision dated 30-01-2019 of Service Tribunal vide Service Appeal No.99/2017 title Amjid ASI vs IGP/KP and decision dated 19-02-2018 title DSP Zahid-ur-Rehman vs PPO, KPK, vide service appeal No.182/2017.
- As well as FRP's Head Constables promoted to the rank of SI/PC directly in FRP, without brought on promotion, List "D" and List "E" considered on the time of their transfer/ induction from FRP, to District/ Region considered as List "E" SI's on bottom of the List "E" in the year 2007. But in new seniority lists they were consider to be promoted as SI from the date of their promotion as PC in FRP at that time their name were neither on list "D" and "E". They were included at bottom of "E" list in 2007. But i was included in "E" list since 2003. All of them became senior to me. As per Police Rules 13-15(4) seniority is given to the official from the date of entry into promotion lists.
- According to Police Rules list of promotion for junior rank i.e. list A, B, C, D, E & F which are mandatory for promotion. As one Constable brought on promotion list C-I after qualifying Lower School Course who will be promoted as Head Constable on the seniority basis.
- From one promotion to higher rank same terms and condition mandatory under Police Rules 13-10(2) and according to standing orders i.e. completion of SHO's period and ACR's etc.
- All the seniorities are fixed as List "A", "B", "C", "D", "E" & "F" separately.

ATTESTED

27

promotion List "F".

➤ If the terms and condition are not met out by the individual then he will be not promoted to the higher rank and down from his colleagues. And Police Rules 13-18 is only for confirmation and rules and standing orders are for promotion.

Previous seniority list issued vide No.352/SE-I, dated: 21-02-2022 in the name of appellant below the name of Amjid Hussain DSP at serial No.76, but my name in seniority list vide No.1355/SE-I, dated: 28-06-2022 is at serial No.116.

The appellant was promoted as ASI on 11-10-2000 and confirmed as ASI on 10-10-2003 and my name brought into List "E" with effect from 10-10-2003 and I was promoted as SI vide RPO, Hazara order notification No. 10211-12/E dated: 28-12-2005 and confirmed as SI vide notification No. 4605-16/E dated: 08-04-2008 and brought into List "F". Promoted as Inspector vide CPO, Notification No.21319/E-II, dated: 29-07-2008. I was promoted as DSP vide notification No.1092/E-II, dated 12-09-2014.

According to rules all the seniority lists prepared on promotion basis/ courses and standing orders already available for the purpose, which are not changed up till now. According to Police Rule 12.2 (3) after 11-10-2000 all the direct appointee ASIs and FRP inducted are junior to me but present seniority list shows me junior to them.

It is therefore requested that my seniority may be examine minutely and my name may be write below the name of DSP Amjid Hussain, please.



RIZWAN

Deputy Superintendent of Police,
Presently posted as Acting SP/ Elite
Force, Hazara Region, Abbottabad

ATTESTED

28

ANNEXURE - "F"



OFFICE OF THE SUPERINTENDENT OF POLICE, ELITE FORCE, HAZARA REGION, ABBOTTABAD.

No. 924 /Dated Abbottabad the 05-07-2022.

32

To,

The worthy Regional Police Officer,
Hazara Range, Abbottabad.

Subject: APPLICATION/ REPRESENTATION AGAINST SENIORITY LIST OF
DSsP.

Memo:

Enclosed please find herewith an application in respect of undersigned regarding representation against seniority list of DSsP for onward submission to quarter concerned, please.

Superintendent of Police
ELITE FORCE
Superintendent of Police, Elite Force,
Hazara Region, Abbottabad.

ATTESTED

(29)

ANNEXURE "G"



OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpolhazara@gmail.com

NO: 16493/E. DATED 06/07/2022

To: Assistant Inspector General of Police,
Establishment, Khyber Pakhtunkhwa,
Peshawar.

Subject: REVISED SENIORITY LIST 2022

With reference to your office notification No. 1354/E-I, dated
28-06-2022 on the above cited subject.

Enclosed find herewith an appeals submitted by the following officers
regarding re-consideration of their seniority list, erstwhile, revised vide notification
mentioned in the letter under reference, for your consideration, please:

1. Mr. Mujeeb ur Rehman, acting SP Investigation, Haripur.
2. Mr. Rizwan Habib, acting SP Elite Force, Hazara.
3. Mr. Jehangir Khan, acting SP Investigation, Lower Kohistan.


Regional Police Officer,
Hazara Region, Abbottabad.

cc
ATTACHED

(30)

درخواست حصول تقول ANNEXURE -H

ایڈیشنل انسپکٹر جنرل اسٹیبلشمنٹ خیبر پختونخواہ CPO پشاور۔

جناب عالی!

گزارش ہیکہ میں بحیثیت ایکٹنگ اسپیلیٹ فورس ہزارہ ریجن فرائض سرانجام دے رہا ہوں۔ سائل کی سناریٹی سال 2014 سے سال 2022 تک جو بھی DSsP کی سناریٹی لسٹ جاری ہوئی اس میں سائل کا نام امجد حسین DSP کے بعد آتا رہا۔ سناریٹی لسٹ بحوالہ آرڈر نمبر ا-352/SE-1 مورخہ: 21-02-2022 جاری شدہ CPO پشاور میں سائل کا نام رحیم حسین DSP، امجد حسین DSP کے بعد سریل نمبر 76 پر درج ہے۔

جبکہ مورخہ: 28-06-2022 کو بحوالہ آرڈر نمبر 1355/S-EI کو DSsP کی Revised سناریٹی لسٹ جاری ہوئی جس میں کئی جوئیر افسران کو سائل سے آگے کیا گیا ہے۔ سائل کا نام سلسلہ 116 لایا گیا جس سے سائل کی سناریٹی کو بہت زیادہ نقصان ہوا۔ سائل نے اس سلسلہ میں اس سناریٹی لسٹ ک خلاف جناب W/IGP صاحب پشاور کو Representation/ Appeal تھرو پر اپرچینل بحوالہ لیٹر نمبر 16493 مورخہ: 16-07-2022 بذریعہ دفتر جناب W/RPO صاحب ایبٹ آباد سے CPO پشاور بھجوائی گئی اور بحوالہ آرڈر نمبر ا-1594/SE-1 مورخہ: 05-08-2022 فائل سناریٹی لسٹ آف DSsP، CPO پشاور سے جاری ہوئی۔ جس پر سائل کا نام رحیم حسین DSP، امجد حسین DSP سریل نمبر 63,62 کے بعد سریل نمبر 64 پر آنا تھا جبکہ سائل کا نام سریل نمبر 115 پر لایا گیا ہے۔ جس سے لگتا ہے کہ سائل کی اپیل خارج ہو چکی ہے مگر فیصلہ سے سائل کو تاحال آگاہ نہیں کیا گیا ہے۔ استدعا ہیکہ میری مذکورہ اپیل کے فیصلے کی نقل فراہم کی جائیں۔ تاکہ سائل انصاف کے لئے متعلقہ فورم سے رجوع کر سکے۔

العارض



DSP رضوان حبیب

ایکٹنگ سپرنٹنڈنٹ آف پولیس

ایلیٹ فورس ہزارہ ریجن ایبٹ آباد

ATTACHED



31

OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

NO: 21922 /E DATED 08/09/2022

ANNEXURE-I

To: ✓ Assistant Inspector General of Police,
Establishment, Khyber Pakhtunkhwa,
Peshawar.

Subject:- APPLICATIONS

Memorandum:

Enclosed find herewith applications submitted by Mr. Rizwan Habib (DSP), acting SP Elite Force, Hazara & Mr. Jehangir Khan (DSP), acting SP Investigation Lower Kohistan for the provision of photocopies of decision made on the appeals erstwhile submitted for restoration of their seniority, and the same was endorsed vide this office letter No. 16493/E, dated 16-07-2022, please.


Regional Police Officer,
Hazara Region, Abbottabad.

08

09
ATTACHED

کورٹ فیس

وکالت نامہ

بعدالت جناب۔ سرس ٹریمنٹل ہسپتال K.P.N

عنوان: رضوان حبیبہ بنام حکومت کے۔ پی کے دفتر

منجانب: ایمیلانڈ

نوعیت مقدمہ: سروس اپیل
باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام

فراز احمد ایڈووکیٹ ماہی ٹورٹ امپڈمنٹ

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختمہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمواد استجارت، ناش بصدیقہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 11/10/2022

بمقام:

ATTESTED

Accepted by

رضوان

رضوان حبیبہ

ایمیلانڈ

رضوان