

19.03.2019 Nemo for the appellant. Mr. Kabirulah Khatak learned Addl; AG for the respondents present. Written reply not submitted. Representative of the respondents department absent. Notices be issued to the appellant as well as representative of the respondents department. Granted. To come up for written reply/comments on 19.04.2019 before S.B.


Member

19.04.2019 Clerk to counsel for the appellant and learned AAG present. Written reply not submitted. No one present on behalf of respondent department. Notice be issued to the respondent department with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 14.06.2019 before S.B.

*I hereby withdraw
the instant appeal
S Naeem Bukhari
Advocate
14-6-2019*


Member

14.06.2019 Syed Naeem Bukhari, learned counsel for the appellant present and submitted application for withdrawal of the present service appeal on the ground that the grievance of the appellant has been redressed and he does not want to pursue the appeal further. The application is placed on record. In this regard signature of learned counsel for the appellant was also obtained at the margin of order sheet as a token of proof. Accordingly the present service appeal is dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED
14.06.2019

Muhammad Amín
(MUHAMMAD AMÍN KHAN KUNDI)
MEMBER

15.10.2018 Neither appellant nor his counsel present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply not submitted. Learned AAG sought some time to submit the same. Granted. Case to come up for written reply/comments on 22.11.2018 before S.B.


(Ahmad Hassan)
Member

22.11.2018 Nemo for appellant. Mr. Usman Ghani, District Attorney for the respondents present and states that the representative of the respondent department has not contacted him for preparation and submission of requisite written reply. Adjourned to 18.12.2018 for written reply before S.B.


Chairman

18.12.2018 None present on behalf of appellant. Written reply not submitted. Respondents also absent. Notice be issued to the respondent department for 24.01.2019 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on the date fixed 24.01.2019 before S.B


Member

24.01.2019 Learned counsel for the appellant present. Written reply not submitted. Ihsanullah SI representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 19.03.2019 before S.B


Member

Before the Chairman Service Tribunal KPK Peshawar.

Syed Naem Hayat vs ISP KPK etc.

Application for withdrawal of above
mentioned appeal.

_____ X _____ X _____

Respectfully Sheweth:

- ① That the above title appeal is pending adjudication which is fixed for today.
- ② That the grievance of the appellant has been redressed and the appellant do not want to proceed the above appeal further.
- ③ That where is no legal barrier in the way of justice if instant application is accepted.

It is therefore prayed that on acceptance of instant application the above title appeal may kindly be disposed as withdrawn.

appellant

Through

S. Hayat
Syed Naem Bukhari

Dated: 14/6/2019

29.05.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that in pursuance of the judgment of the Tribunal dated 15.08.2017 de-novo enquiry was conducted and as a consequence thereof he was exonerated of the charges leveled against him vide order dated 10.10.2018. As a result of dismissal from service his name was removed from the seniority list of Inspectors. He submitted a departmental representation on 16.04.2018 for inclusion of his name in the seniority list of Inspectors but to no avail. The appellant has not been treated according to law and rules; rather was deprived of his legitimate right of including his name in the relevant seniority list.

Appellant Deposited
Security & Process Fee

Points urged need consideration. Admit subject to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 13.08.2018 before S.B.

(AHMAD HASSAN)
MEMBER

13.08.2018

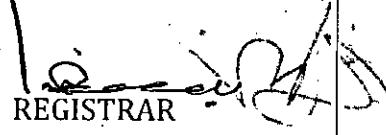
Counsel for the appellant and Mr. Kabirullah Khattak AAG for the respondents present. Written reply not submitted. Learned AAG seeks time to file written reply/comments. Granted. To come up for written reply/comments on 15.10.2018 before SB.

(Muhammad Amin Khan Kundj)
Member

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. **633/2018**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	10/05/2018	<p>The appeal of Syed Naseem Hayat presented today by Syed Naeem Bukhari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	(15/05)18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>29/05/18</u>.</p> <p> CHAIRMAN</p>

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KPK,
PESHAWAR

Appeal No 638 of 2018

Inspector Syed Naseem Hayat.....Appellant

V E R S U S

Inspector General of Police KPK & others.....Respondents

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S#	Description of the Documents	Annex	Pages
1.	<i>Grounds of Service Appeal</i>	*	1-5
2.	<i>Affidavit</i>	*	6
3.	<i>Copy of the Promotion List</i>	"A"	7-9
4.	<i>Copy of the judgment of the Tribunal</i>	"B"	10-14
5.	<i>Copy of the order</i>	"C"	15
6.	<i>Copy of the representation and revised seniority list 'F'</i>	"D" "E"	16-22
7.	<i>Wakalat Nama</i>		23

Dated:- 10/05/2018

Through

Appellant

Syed Naeem Shah Bukhari
Advocate High Court
Peshawar

(A)

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KPK,
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Appeal No 633 of 2018

Diary No. 676

Dated 10-5-2018

Inspector Syed Naseem Hayat S/o Qalandar Shah R/o
Village Wadpagga presently Serving as Incharge
Riding Club Peshawar.....Appellant

VERSUS

1. Inspector General of Police KPK CPO Peshawar
 2. Commandant FRP, KPK Peshawar
 3. DIG HQ Police, KP, Peshawar
-Respondents

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL

ACT 1974 OF KHYBER PAKHTUNKHWA AGAINST THE
IMPUGNED SENIORITY LIST AS STOOD ON 23/5/2017 AND
AGAINST NOT TAKING ACTION ON THE
DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN
THE STATUTORY PERIOD OF NINETY DAYS

Prayer

Filed to-day

Q. S. Registrar On acceptance of the instant service appeal the Respondents
10/5/18 may please be directed to correct the impugned seniority list and to include the name of appellant at proper position i.e. Serial No 109 in seniority list "F" of inspector and Sub Inspector.

Any other remedy which this august tribunal deems fit and appropriate may also be awarded in the favour of the appellant.

Respectfully Sheweth:-

1. That the appellant is rendering his services in Police Department from the last Thirty Six year and due to his enthusiastic and sprightliness performance promoted to the Rank of Inspector in 2015. (***Copy of the promotion list is attached as Annexure A***)
2. That the appellant was removed from his service on the bases of so called allegation on dated 23.9.2015.
3. That the appellant finally filed the service appeal before the worthy chairman service tribunal by impugning the order dated 23.9.2015 and later on through the amended appeal No 19/2016 the order dated 28.1.2016 was also challenged.
4. That appeal was heard by the tribunal and after hearing the contention of both the parties the Worthy Tribunal was please enough to reinstate the appellant for the purpose of denovo inquiry with in sixty days it was further held by the tribunal that failing which the appellant will be assumed to be reinstated in service with all back benefits. (***Copy of the judgment of the Tribunal is attached as Annexure B***)
5. That as the judgment of this August tribunal was not complied in its true letter in spirit as the inquiry was not concluded with in the period of sixty days therefore the appellant filed the execution petition for the

implementation of the judgment of this August Tribunal dated 15/8/2017.

6. That during the pendency of the execution proceedings the denovo inquiry was held in the light of the judgment of the Worthy Service Tribunal and after conducting a brief inquiry by examining various witnesses the appellant was found innocent and hence exonerated from all the charges leveled against him. (**Copy of the order is attached as Annexure "C"**)
7. That thereafter the appellant filed the departmental representation before the respondents for inclusion of his name in the seniority list of the Inspectors but despite passing the statutory period of Ninety days the grievance of the appellant could not be addressed. (**Copy of the representation alongwith revised seniority list 'F' are attached as annexure D & E**)
8. That now the appellant has approached this august Tribunal and seeks the inclusion of his name in the seniority list of inspectors on the following grounds amongst other.

Grounds:-

- A) That the act of the respondents is highly against the law and protected rights of the appellant enshrined under the constitution of Islamic Republic of Pakistan 1973.

- B) That the respondents exonerated the appellant and reinstated him in service with all back benefits but despite their own order the name of appellant was not included in the seniority list of the inspectors.
- C) That it pertinent to mentioned here that the respondent have nominated and sent for the advance course of DSP which are more junior from the appellant.
- D) That not responding on the departmental appeal within the statutory period of ninety days and not including the name of the appellant in the seniority list of inspectors is against the law, illegal and thus calling interference of this august Tribunal.
- E) That according to section 8 of the Civil Servant Act 1973 and section 17 of APT rules 1989" it is the legal right of every civil servant to properly be place in seniority list according to his seniority position but the same benefit was not extended to the appellant which is the violation of law and rules.
- F) That the appellant was not treated according to the law and rules and has been deprived from of his legal right of seniority in arbitrary manner with out any fault on his part.
- G) That the appellant seeks permission to advance any other grounds and proofs at the time of hearing.

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

Dated:- 10/05/2018

Through Appellant

Syed Naeem Shah Bukhari
Advocate High Court
Peshawar

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KPK,
PESHAWAR

Appeal No _____ of 2018

Inspector Syed Naseem Hayat.....Appellant

V E R S U S

Inspector General of Police KPK & others.....Respondents

AFFIDAVIT

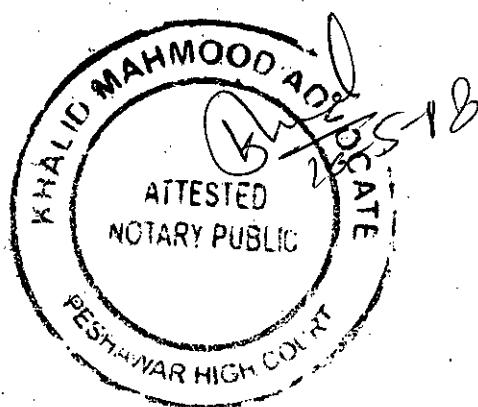
I, Inspector Syed Naseem Hayat S/o Qalandar Shah

R/o Village Wadpagga presently Serving as Incharge Riding

*Club Peshawar, do hereby solemnly affirm and declare on
oath that the contents of this accompanying Service Appeal
are true and correct to the best of my knowledge and belief
and nothing has been concealed from this Honourable Court.*



DEPONENT





OFFICE OF THE
INSPECTOR GENERAL OF POLICE
HYBHER PAKHTUNKHWA
Central Police Office, Peshawar
No. 181-95/E-II, dated 3 / 2

No. 181-95/E-II, dated 3 / 2 /15.

To All Addl: Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
The Capital City Police Officer,
Peshawar.
All Regional Police Officers,
Khyber Pakhtunkhwa, Peshawar.
All Deputy Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
The Commandant,
PTC Hangu.
The Director,
Anti-Corruption,
Khyber Pakhtunkhwa,
Peshawar.
The Principals,
RTW Mansehra & Kohat.

Subject CONFIRMATION AS INSPECTOR
Memo

Probation period of the following Off. Inspectors of your Region/Unit have completed. Their confirmation cases are being to be discussed in DPC shortly. Please furnish their No pending Departmental Enquiry Certificate to this office.

S #	Name & No.	Home District
1.	Insp: Abdul Hameed No.H/5	Abbottabad.
2.	-do- Mazhar Jahan No.K/19	Kohat
3.	-do- Muhammad Zaman No.M/279	Malakand
4.	-do- Aurang Zeb No.H/258	Hazara Region
5.	-do- Muhammad Khurshid No.H/201	-do-
6.	-do- Iftikhar Ali Shah No.B/24	Bannu
7.	-do- Raza Khan No.D/01	DIKhan ✓
8.	-do- Muhammad Riaz No.H/14	Hazara
9.	-do- Muhammad Amjad No.H/45	Hazara
10.	-do- Muhammad Javid No.H/26	Hazara
11.	-do- Noor Jalil No.M/175	Malakand
12.	-do- Ghulain Hussain No.226/M	-do-
13.	-do- Mehmood Nawaz No.B/19	Bannu
14.	-do- Umar Daraz Khan No.D/14	DIKhan
15.	-do- Bashir Dad No.P/149	Mardan
16.	-do- Muhammad Riaz No.K/107	Karak
17.	-do- Roshan Zeb No.P/51	Mardan
18.	-do- Gul Sheed Khan No.P/152	Charsadda
19.	-do- Taj Malook No.P/153	-do-
20.	-do- Muhammad Sadique No.P/154	Abbottabad.
21.	-do- Abdur Rehman No.P/155	Peshawar

24.	-do- Tayyab Jan No.P/158	Bannu
25.	-do- Fazal Wahid No.P/159	Mardan
26.	-do- Fazal Subhan No.P/160	Nowshera.
27.	-do- Alam Zeb No.P/161	Mardan
28.	-do- Saeed Khan NO.P/162	Peshawar
29.	-do- Noor Ullah No.P/164	Peshawar
30.	-do- Muhammad Ishaq No.P/165	Nowshera
31.	-do- Pasham Gul No.P/166	Mardan
32.	-do- Mukhtiar Ahmed No.P/167	Charsadda ✓
33.	-do- A.mir Nawaz No.P/168	-do-
34.	-do- Liaqat Khan No.P/169	Peshawar
35.	-do- Muhammad Shoaib No.P/170	Mardan
36.	-do- Afsar Zaman No.P/171	Mardan
37.	-do- Rajab Ali No.P/172	Kohat.
38.	-do- Johar Shah No.P/173	Charsadda
39.	-do- Ali Khan No.P/174	Malakand
40.	-do- Abdur Rasheed No.P/175	Charsadda.
41.	-do- Khalid Khan No.P/176	Nowshera
42.	-do- Niaz Muhammad No.P/177	Charsadda
43.	-do- Allama Iqbal No.P/178	-do-
44.	-do- Tauheed Ullah No.P/179	-do-
45.	-do- Muhammad Arif No.M/218	Dir Lower
46.	-do- Waheedullah No.M/160	-do-
47.	-do- Muhammad Nawaz No.M/273	-do-
48.	-do- Zahid Khan No.M/302	Malakand Region
49.	-do- Badshah Hazrat No.M/303	Dir Lower
50.	-do- Naveed Iqbal No.M/176	Swat
51.	-do- Ajmal Khan No.M/151	Malakand
52.	-do- Atiqur Rehman No.M/261	Chitral
53.	-do- Muhammad Saeed No.M/317	Dir Lower
54.	-do- Ghulam Sadique No.M/269	Malakand
55.	-do- Saifullah Khan No.K/39	Kohat
56.	-do- Habibullah No.K/45	Bannu
57.	-do- Muhammad Iqbal No.K/10	Peshawar
58.	-do- Hussain Ghulam No.K/87	Hangu
59.	-do- Muhammad Iqrar NO.H/29	Mansehra
60.	-do- Farhad Ali NO.H/30	Mardan
61.	-do- Azam Ali Shah NO.H/32	Abbottabad
62.	-do- Arshad Hussain No.H/33	MKD Region
63.	-do- Matloob Khan H/34	Haripur
64.	-do- Shah Nawaz No.H/35	Mansehra
65.	-do- Shad Muhammad No.H/36	Haripur
66.	-do- Raja Mukhtiar No.H/49	Mansehra
67.	-do- Fazal Wahab No.H/37	Mardan
68.	-do- Jehanzeb Khan No.H/39	Abbottabad.
69.	-do- Muhaminad Amin NO.H/42	-do-
70.	-do- Ihsan Shah No.H/44	Haripur
71.	-do- Muhammad Yousaf No.H/46	-do-

Syed Noman Ali Bukh
Advocate
Attested

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ریاست اسلامیہ پاکستان

(9)

74.	-do- Zahoor Ahmed No.M/127	Dir Lower
75.	-do- Habibullah Khan No.M/168	Dir Lower
76.	-do- Fazal Dad No.P/181	Charsadda
77.	-do- Abdullah Jan No.P/182	Peshawar
78.	-do- Gohar Khan No.P/183	Peshawar
79.	-do- Naseem Hayat No.P/184	Peshawar.
80.	-do- Nasrullah Khan NO.P/185	Peshawar
81.	-do- Janan Habib NO.P/186	Chasadda
82.	-do- Arshad Ahmed No.P/187	Nowshera
83.	-do- Muhammad Kamran No.P/188	Peshawar
84.	-do- Sajid Mumtaz No.P/189	Charsadda
85.	-do- Fida Hussain No.P/190	Peshawar,
86.	-do- Ijaz Ali No.P/191	Charsadda
87.	-do- Zaka Ullah NO.P/192	Nowshera
88.	-do- Taj Muhammad Khan No.P/193	-do-
89.	-do- Ijaz Ali No.P/194	Charsadda
90.	-do- Adnan Azam No.P/195	Charsadda
91.	-do- Rehmat Ullah No.P/197	Peshawar
92.	-do- Muhammad Inam Jan NO.MR/59	Mardan
93.	-do- Luqman Khan No.MR/80	Mardan.
94.	-do- Ikhtiraz Khan No.MR/81	Mardan
95.	-do- Pir Zar Bad Shah No.MR/82	Malakand Region
96.	-do- Muhammad Fazil NO.MR/83	Mardan
97.	-do- Imtiaz Ali No.MR/84	Mardan.

w
Syed Noman Ali Bukh
 Advocate
 Attested

(PERVEZ ELAHI)
 Registrar

For Inspector General of Police,
 Khyber Pakhtunkhwa Peshawar

No. /E-II, dated Peshawar the / 2015.

Copy of above is sent to Office Supdt: Secret CPO to furnish
 Synopsis of their last 05 years ACRs.

(PERVEZ ELAHI)
 Registrar

For Inspector General of Police,
 Khyber Pakhtunkhwa Peshawar

(10)

BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR

Service appeal No:

19/2016



K.W.P. Province
Service Tribunal

Case No 07

Dated 4-1-2016

Syed Naseem Hayat S/O (Ex-Inspector) S/O Qalandar shah R/O village
Wadpagga, Tehsil & District Peshawar

Appellant

VERSUS

- 1) Govt of KPK Through Chief Secretary, civil secretariat, Peshawar
- 2) Inspector General of Police, KPK, Peshawar
- 3) Commandant FRP KPK Peshawar
- 4) Superintendent of police enquiry & inspection, CPO Peshawar
- 5) The Additional Inspector General of police special branch KPK Peshawar
- 6) Deputy inspector General Mardan Region 1
- 7) D.P.O. Charsadda
- 8) A.S.I Saifullah P.S Khwaja was, District Charsadda

Respondents

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974

AGAINST THE OFFICE ORDER NO 8081 DATED

23/9/2015 OF RESPONDENT NO 3, WHEREBY THE

APPELLANT WAS REMOVED FROM SERVICE IN TERM

OF RULE-5(3) OF KPK POLICE RULES

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Prayer in appeal

Re-submitted

E/1/16

Today

On acceptance of this service appeal, the impugned order dated 23/09/2015 may please be set aside and the appellant may kindly be reinstated in service with all back benefits.

(25)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUAL

Appeal No. 19/2016

Date of Institution ... 04.01.2016

Date of Decision ... 15.08.2017



Syed Naseem Hayat, Ex-Inspector S/O Qalandar Shah,
R/O Village Wadpagga, Tehsil & District Peshawar. ... (Appellant)

VERSUS

Govt; of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat,
Peshawar and 7 others. ... (Respondents)

MR. SYED NAEEM BUKHARI
Advocate

For appellant.

MR. KABIR ULLAH KHATTAK
Assistant Advocate General

For respondents.

MR. NIAZ MUHAMMAD KHAN, ...
MR. AHMAD HASSAN ...

CHAIRMAN
MEMBER

JUDGMENT

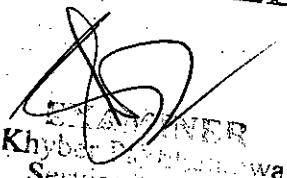
NIAZ MUHAMMAD KHAN, CHAIRMAN-

Arguments of the

learned counsel for the parties heard and record perused.

FACTS

2. The appellant was proceeded against departmentally on the basis of a complaint lodged by one of his subordinate namely Saifullah, ASI on 15.06.2015. Thereafter an enquiry was conducted without any statement of allegation and charge sheet. The Enquiry Officer submitted his report on 27.07.2015 in which he proposed the penalty of dismissal from service after conducting proper enquiry. But the authority instead of conducting proper

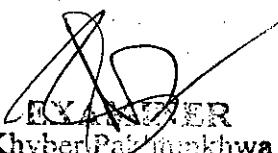
ATTESTED

Chairman
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

enquiry issued a show cause notice dated 1.09.2015 by adding the reasons that in view of preliminary enquiry report before him there was no need of any proper enquiry. Thereafter the reply was submitted by the appellant and finally the impugned order was passed on 23.09.2015 by imposing major penalty of removal from service. Against this the appellant filed departmental appeal on 06.10.2015 and when the same was not responded to, the appellant filed the present appeal on 04.01.2016 in the meantime the departmental appeal was rejected on 28.01.2016 and thereafter appellant filed amended appeal on 26.02.2016.

ARGUMENTS

3. The learned counsel for the appellant argued that no regular enquiry was ordered or held. That no charge sheet or statement of allegations were issued to the appellant. That the impugned order is based on enquiry report which was a fact finding enquiry report. That the impugned order is not sustainable in the eyes of law.
4. On the other hand, the learned Assistant A.G. argued that the antecedents of the appellant show that he was compulsorily retired on a previous occasion. That a complaint was filed by one of his subordinates fully disclosing the charges against the appellant. That the fact finding enquiry was conducted in the matter. That the appeal was rejected by the appellate authority after placing the case before a board. That the appeal is liable to be dismissed. Learned AAG also argued that the appeal to the departmental authority is time barred and no date of appeal is mentioned on the departmental appeal.

ATTESTED



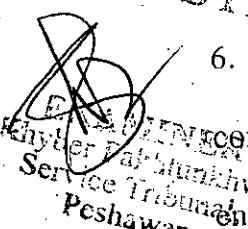
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

CONCLUSION.

5. Admittedly no formal enquiry was conducted though it is the requirement of law and especially when the fact finding enquiry report also recommended that a proper enquiry should be conducted. That the formal enquiry could be dispensed with if such material was available before the authority which needed no further proof but in the present case the only reason given by the authority for dispensing with the regular enquiry was what had been stated in the complaint or in the preliminary enquiry report. The reasons are not based on any record which is undisputed or proved. Regardless of the proof or otherwise of the charges, it was his right to have been given sufficient opportunity of hearing and other elements of due process. The authority in the impugned order has again referred to finding in the preliminary enquiry report which finding is not allowed to be taken into consideration under the law as the requirement of due process as mentioned above has not been fulfilled while conducting the preliminary enquiry. It is correct that there is no date on the departmental appeal but the order of appellate authority rejecting the departmental appeal does not contain any reference to limitation rather the same has been dismissed on merits. And when any departmental appeal is dismissed on merits then this Tribunal has got no jurisdiction to enter into the question of limitation qua the departmental appeal.

ATTESTED

6. As a nutshell of the above discussion this Tribunal reaches the conclusion that it was incumbent on the department to have conducted proper enquiry in the circumstances of the case. This Tribunal, therefore, by accepting the present appeal directs the respondent-department to conduct *de-novo* enquiry in accordance with law within a period of 60 days after receipt of this judgment. Failing which the appellant shall be deemed to have been



E. M. Akbar
Salar Parvez Khan
Service Tribunal
Peshawar

reinstated into service. The matter of benefits of the intervening period shall be subject to the outcome of *de-novo* enquiry. Parties are left to bear their own costs. File be consigned to the record room.

Announced Sd/- Niaz Muhammad Khan,
15-08-2017 Chairman

Sd/- Ahmad Hassan
Member

Certified to be true copy
Engr. M. I. TURKWA
Chairman
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 26-04-18

Number of Words 2000

Copying Fee 12/-

Urgent 0/-

Total 12/-

Name of Copyist M. I. TURKWA

Date of Completion of Copy 30-4-18

Date of Delivery of Copy 30-4-18



(15)

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

No. S/ 144 /18 dated Peshawar, the 10/10/2018.

ORDER

This order is passed in the de-novo enquiry proceedings initiated against Naseem Hayat Inspector (herein after referred to only as accused officer) in compliance with judgment of the Service Tribunal dated 15.08.2017, passed in Service Appeal No. 19/2016. The brief, yet relevant, facts of the case are that accused officer while posted as SHO Police Station Khwaja Was, District Charsadda was removed from service vide order dated 23.09.2015 of Commandant FRP Khyber Pakhtunkhwa, Peshawar on charges of avoiding registration of the case against the criminals who allegedly made firing on Police party under the Command of accused officer while conducting raid for the arrest of criminals. The fire shots of criminal hit the front screen of office vehicle and its broken pieces caused injuries to the driver Constable. He allegedly arrested the relatives of the criminals but released them after receipt of illegal gratification. He was reportedly in league with smugglers. His departmental appeal was rejected vide order dated 28.01.2016.

Accused officer filed Service Appeal before Service Tribunal Khyber Pakhtunkhwa which was contested and the Service Tribunal remanded the case for de-novo enquiry proceedings. He was reinstated in service for the purposes of de-novo enquiry proceedings vide order No. S/5329-40/17 dated 29.08.2017. Fresh Charge Sheet was issued to accused officer and enquiry committee comprising of Imran Malik AIG and Hukam Khan DSP of Enquiry & Inspector CPO, Peshawar was appointed for scrutinizing the conduct of accused officer with reference to the charges leveled against him.

The enquiry committee conducted enquiry and examined the Police Constables present with the accused officer during the alleged raid on the houses of the criminals. The committee recommended that the allegations leveled against the accused officer could not be proved, therefore, the charge sheet may be dropped and accused officer may be reinstated in service.

The enquiry committee has made recommendations in unequivocal terms of exoneration of the accused officer, therefore, he is exonerated from the charges leveled against him. The intervening period may be considered as leave of the kind due.

(SHER AKBAR)

PSP, S.St

Deputy Inspector General of Police HQrs:

For inspector general of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. S/ 145-46 /18

Copy of the above is forwarded to the:

1. Commandant FRP Khyber Pakhtunkhwa, Peshawar.
2. Office Supdt: E-III, CPO Peshawar

(26) Departmental Representation

Respected Sir,

537
17-01-18

I was dismissed from Service.

I have re-instated in Service by

Service Tribunal for De-nore Inquiry. The De-nore inquiry conducted by (Imran Malik) AIG Inquiry & (Hukam Khan) DSP Inquiry. The Inquiry Committee recommended that the allegation against me could not proved. Therefore, I was re-instated by D2

H.Q.R.S.: As the intervening period was considered as leave of kind due to dismissal from service my name was deleted from the seniority list of Inspectors.

Syed Noman Ali Bukh

It is therefore, that my name may be Attested

Please be included in seniority list of Inspectors

EC
for further process

J. No:
By Comptt FRP

Dated 16/01/18

J. No:
(Naseem Hayat)

Inspector FRP/HQRS Peshawar

(27)

OFFICE OF THE
COMMANDANT
FRONTIER RESERVE POLICE
HYBER PAKHTUNKHWA, PESHAWAR
Email: comdtfrpofficial@gmail.com
Ph: No. 091-9214114 Fax No. 091-9212602

No. 671 /EC, dated 22/6/2018.

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

Subject: - APPLICATION.

Memo: -

Enclosed please find herewith an application preferred by Inspector Naseem Hayat requesting therein for inclusion of his name in seniority list of Inspectors with his colleagues is forwarded herewith for consideration please.

Ver
Syed Noman Ali Bukh
Advocate
Attested

[Signature]
COMMANDANT,
Frontier Reserve Police,
Khyber Pakhtunkhwa,
Peshawar.
BD. 1/2/10

18

REVISED SENIORITY LIST OF INSPECTORS & SUB INSPECTORS ON LIST "F" OF KHYBER PAKHTUNKHWA, POLICE AS IT STOOD ON 23.05.2017.

No. 1326/E-II, Seniority List:- The seniority list of Inspectors and Sub Inspectors on List "F" of Khyber Pakhtunkhwa Police as it stood on 23.05.2017 is hereby published for information to all concerned. -

#	S.	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMMN: TO LIST "F"	D.O PROMOTION AS OFFC: INSPECTOR	D.O CONF: AS INSP:	REMARKS
1.		Sher Ali No.M/110	Dir Lower	BA	01.04.1960	06.10.1977	21.06.2008	25.05.2015	25.05.2015		He is yet to be confirmed after completion of probation period of 2 years.
2.		Muhammad Sajjad No. K/30	Karak	MA	12.08.1965	02.05.1991	16.03.2005	07.11.2007	11.01.2008	23.12.2011	Assigned seniority vide No. 4526-70/E-II dated 04.03.2008
3.		SI Samauallah No. D/10	D.I.Khan	10 th	12.04.1959	17.06.1977	01.09.2007	05.04.2008	05.04.2008		Reverted as SI by RPO.Bannu vide No. 3067-69 EC dt: 16.11.2016
4.		Ichanzeh No.H/43	Manshera	10 th	03.03.1960	26.05.1984	27.03.2008	05.04.2008	05.04.2008	31.10.2013	Name replaced in the seniority list according to his date of confirmation in the rank of SI and admission to list "F" vide endst No.2371-86/E-II, DT 09.11.2016.
5.		SI Sabir Khan No.P/69	Pesahwar	BA	08.12.1958	21.12.1994	30.06.2008	05.04.2008	05.04.2008		Reinstated in service by applet board & reverted to the rank of SI vide PPO No S780-89 dated 29.01.2016.
6.		S. Jamal Athar Shah No. P/76	Peshawar	M.Sc	20.03.1975	25.06.1998	30.06.2008	05.04.2008	05.04.2008	31.10.2013	
7.		Sher Atsar No.MR/66	Swabi	10 th	09.02.1963	30.10.1984	13.07.2009	20.12.2011	25.05.2016		Assigned fixation of seniority with his colleagues officers vide order Endst No.482-85/E-II, DT 16.02.2017.
8.		SI Mazhar Jeljan No. K/19	Kohat	FA	12.12.1970	26.02.2000	30.06.2008	30.07.2010	30.07.2010		Reverted to the rank of SI vide DIG Kohat Region Order Endst No.2146-47/EC dt:26.2.2014
9.		Nasir Khan No. P/110	Peshawar	BA	20.12.1972	02.05.1991	24.11.2008	30.07.2010	30.07.2010	29.8.2014	
10.		Jamil-Ur-Rehman No H/28	A Abbottabad	BA	16.04.1974	07.01.2002	07.01.2002	25.02.2008	25.02.2008	29.08.2014	
11.		Rehmat Ali No. P/150	Peshawar	10 th	01.03.1960	17.06.1979	04.11.2011	10.11.2011	10.11.2011	02.08.2012	

Syed Norman Ali Bukh
Advocate
Attested

S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMMN: TO LIST "F"	D.O PROMOTION AS OFFG: INSPECTOR	D.O CONF: AS INSP:	REMARKS
12	SI Asad Zubair No. K/20	Kohat	FSc	15.01.1980	24.02.2000	30.06.2008	20.12.2011	20.12.2011	-	Reverted to the rank of SI vide DPO Kohat Order Endst: No.5599-5602-P.A., 22.09.2014
13	Shahid Adnan No. D/02	D.I.Khan	MA	27.03.1973	21.12.1992	12.11.2010	20.12.2011	20.12.2011	29.08.2014	
14	Muhammad Saleem Tariq No. D/03	D.I Khan	FA	01.03.1969	03.01.1991	12.11.2010	20.12.2011	20.12.2011	29.08.2014	
15.	Aqil Hamid No. P/132	Karachi	BA	12.06.1963	05.01.1992	12.12.1999	20.12.2011	03.04.2013	08.10.2015	Granted 365 days LPR w.e.f 01.04.2017 vide order No 1009-13/E-II, Date 12.04.2017.
16	Zakir Hussain No. H/13	Abbottabad	10 th	09.03.1966	23.12.1985	19.07.2011	20.12.2011	20.12.2011	29.8.2014	
17	Bashir Ahmad No. H/17	Abbottabad	10 th	11.05.1962	11.02.1982	19.07.2011	20.12.2011	22.01.2016	29.08.2014	Re-promoted as Offg. Inspector by DPC meeting held on 19.11.2015 Granted two years condonation under Police rules 13.14(2) Police Rule 1934 vide order No 749-69(E-II, dt 16.03.17)
18	Matloob Shah No.H/19	Manshera	10 th	07.01.1968	01.07.1989	19.07.2011	20.12.2011	20.12.2011	29.08.2014	
19	Muhammad Hamayun No H/20	Abbottabad	10 th	01.04.1963	21.11.1981	19.09.08	20.12.2011	20.12.2011	29.08.2014	
20.	Farman Akhtar No. H/21	Haripur	7th	01.01.1966	08.07.1984	19.07.2011	20.12.2011	20.12.2011	29.08.2014	
21	Ashiq Hussain No. H/22	Mansehra	10 th	06.12.1960	24.12.1978	19.07.2011	20.12.2011	20.12.2011	29.08.2014	
22	Mukhtar Ahmed No. H/23	Mansehra	10 th	06.04.1962	09.02.1982	19.07.2011	20.12.2011	20.12.2011	29.08.2014	
23	Adalat Khan No. H/24	Abbottabad	10 th	04.08.1960	04.11.1978	19.07.2011	20.12.2011	20.12.2011	29.08.2014	
24	Ghulam Muhammad No H/25	Mansehra	10 th	01.11.1963	02.05.1982	19.07.2011	20.12.2011	20.12.2011	29.08.2014	
25.	Muhammad Javed No. /26	Mansehra	10 th	03.02.1964	04.04.1983	19.07.2011	20.12.2011	22.01.2016	-	Re-promoted as Offg. Inspector by DPC meeting held on 19.11.2015
26	Muhammad Nabi No. MR/77	Charsadda	BA	09.10.1966	28.12.1985	28.09.2011	20.12.2011	20.12.2011	29.08.2014	
27	Avaz Mehmood No. MR/78	Mardan	BA	20.02.1971	26.01.91	28.09.2011	20.12.2011	20.12.2011	29.08.2014	
28.	Shah Mumtaz No. MR/79	Dir Lower	FA	20.02.1963	28.06.86	28.09.2011	20.12.2011	20.12.2011	29.08.2014	
29.	Habib-Ul-Haq No. M/258	Buner	FA	05.04.1958	02.07.76	13.10.2011	20.12.2011	20.12.2011	29.08.2014	
30.	Zafar Ahmed No. M/178	Chitral	FA	10.01.1979	15.01.01	13.10.2011	20.12.2011	20.12.2011	29.08.2014	
31.	Farmarullah No. M/176	Dir Lower	FA	27.10.1978	15.01.2001	13.10.2011	20.12.2011	20.12.2011	29.08.2014	
32.	Muslim Khan P/137	Mardan	FA	16.02.1970	30.06.88	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
33.	Said Rahum No. P/138	Mardan	10 th	08.02.1962	01.03.81	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
34.	Hukam Khan No. P/139	Charsadda	MA,LLB	14.03.1969	31.12.87	26.10.2011	20.12.2011	20.12.2011	29.08.2014	

Syed Noman Ali Rukh
Advocate
Attested

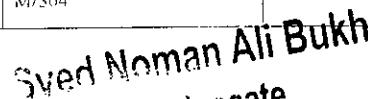
S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMMIN: TO LIST "F"	D.O PROMOTION AS OFFG: INSPECTOR	D.O CONF: AS INSP:	REMARKS
35.	Wilavat Khan No P/140	Peshawar	10 th	20.12.1960	04.03.81	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
36.	Mehar Ali P/141	Nowshera	FA	01.01.1969	31.12.87	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
37.	Yar Nawab No. P/142	Mardan	10 th	05.11.1963	22.11.81	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
38.	Iftikhar Ali No. P/143	Charsadda	10 th	10.02.1968	04.01.87	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
39.	Nasir Khan No P/145	Charsadda	MA	22.11.1968	29.08.88	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
40.	Noor Zaman No. P/146	Mardan	10 th	21.08.1961	15.06.80	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
41.	Hazratullah No. P/147	Charsadda	10 th	05.01.1964	01.08.82	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
42.	Liaqat Ali No. P/148	Charsadda	10 th	08.04.1964	26.03.83	26.10.2011	20.12.2011	20.12.2011	29.08.2014	
43.	Noor Jalil No. 175.M/	Buner	BA	01.02.1958	19.07.76	21.06.2008	30.01.2013	30.01.2013	19.10.2015	
44.	Mehmood Nawaz B/19	Lakki	FA	07.03.1974	29.02.2000	29.08.2010	30.01.2013	30.01.2013	19.10.2015	
45.	Muhammad Yousaf No.D/13	D.I Khan	10th	10.02.1961	04.03.1979	07.05.2011	30.01.2013	30.01.2013	19.10.2015	
46.	Umar Daraz Khan No. D/14	D.I.Khan	10th	11.08.1961	07.02.1983	30.05.2011	30.01.2013	30.01.2013	19.10.2015	
47.	Bashir Dad No. P/149	Mardan	10th	14.04.1972	15.09.91	26.10.2011	30.01.2013	30.01.2013	19.10.2015	
48.	Muhammad Riaz No K/107	Karak	10th	13.08.1973	09.09.1991	02.12.2011	30.01.2013	30.01.2013	19.10.2015	
49.	Roshan Zeb No. P/51	Mardan	FA	16.02.1964	01.04.1982	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
50.	Gul Sheed No. P/152	Charsadda	FA	01.06.1980	06.07.1998	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
51.	Taj Malook No P/153	Charsadda	BA	10.02.1961	20.03.1979	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
52.	Muhammad Saddique No. P/154	Abbottabad	BA	16.11.1968	31.12.1987	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
53.	Abdur Rehman No. P/155	Peshawar	10 th	17.11.1966	15.01.1981	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
54.	Samin Jan No. P/156	Peshawar	FA	06.03.1961	10.04.1982	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
55.	Tayyab Jan No. P/158	Charsadda	FA	01.05.1970	01.07.1989	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
56.	Fazal Wahid No. P/159	Mardan	10 th	01.12.1968	31.12.1987	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
57.	Fazal Subhan No. P/160	Nowshera	10 th	02.05.1968	26.03.1987	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
58.	Alam Zeb No. P/161	Mardan	10 th	10.11.1963	01.11.1982	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
59.	Saeed Khan No. P/162	Peshawar	FA	15.04.1964	30.10.1982	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
60.	Noor Ullah No. P/164	Peshawar	D.Com	10.05.1964	24.03.1984	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
61.	Muhammad Ishaq No. P/165	Nowshera	10 th	21.12.1968	01.01.1988	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
62.	Pasham Gul No. P/166	Mardan	10 th	29.04.1963	07.12.1981	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
63.	Mukhtiar Ahmad No. P/167	Charsadda	FA	03.12.1964	13.08.1988	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
64.	Amir Nawaz No. P/168	Charsadda	FA	20.03.1970	27.08.1988	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
65.	Liaqat Khan No. P/169	Peshawar	10 th	10.06.1962	24.08.1982	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
66.	Muhammad Shoaib No. P/170	Mardan	FA	29.03.1962	20.09.1986	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
67.	Ahsan Zaman No. P/171	Mardan	FA	01.09.1969	19.06.1988	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
68.	Johar Shah No. P/173	Charsadda	BSc	10.02.1985	21.10.2006	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
69.	SI Ali Khan No. P/174	MKD Agy	BA	20.02.1968	25.09.1988	14.03.2012	30.01.2013	30.01.2013	-	Reverted to the rank of SI vde: DPO Swat OB No 186

Syed Noman Ali Bukh
Advocate
Attested

S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMMN: TO LIST "F"	D.O PROMOTION AS OFFG: INSPECTOR	D.O CONF: AS INSP:	REMARKS
70.	Abdur Rashid No. P/175	Charsadda	BA	03.05.1968	01.07.1990	14.03.2012	30.01.2013	30.01.2013	19.10.2015	dt 27.10.2014
71.	Khalid Khan No. P/176	Nowshera	MA	02.01.1969	31.07.1991	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
72.	Niaz Muhammad No. P/177	Charsadda	BA	14.09.1973	03.08.1994	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
73.	Allama Iqbal No. P/178	Charsadda	BA	05.03.1979	24.06.2000	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
74.	Tuheed Ullah No. P/179	Charsadda	MA	08.04.1982	25.01.2002	14.03.2012	30.01.2013	30.01.2013	19.10.2015	
75.	Faqir Hussain No.P/214	Peshawar	10th	02.02.1967	04.11.1985	06.08.2012	30.01.2013	11.02.2014	11.02.2016	Assigned revised seniority in confirmation in the rank of SI and admission to list "F," vide order No.2387-402/E-II, DT 09.11.2016
76.	Waheedullah No. M/160	Dir Lower	BA	01.04.1981	16.01.02	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
77.	Muhammad Nawaz No. M/273	Dir Lower	10th	01.05.1958	01.05.76	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
78.	Zahid Khan No. M/ 302	Mkd Agy	FA	08.04.1967	25.09.86	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
79.	Badshah Hazrat No. M/303	Dir Lower	BA	15.02.1969	28.03.1987	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
80.	Naveed Iqbal No. M/176	Swat	FA	13.03.1981	26.12.2001	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
81.	Ajmal Khan No. M/151	Mkd Agy	FA	15.05.1982	16.01.2004	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
82.	Atiqur Rehman No. M/261	Chual	FA	01.11.1981	15.01.2004	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
83.	Muhammad Saeed No. M/317	Dir Lower	FA	01.04.1960	05.01.1977	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
84.	Ghulam Sadique No. M/269	Mkd Agy	BA	01.02.1968	27.03.1986	10.08.2012	30.01.2013	30.01.2013	19.10.2015	
85.	Saifullah Khan No. K/39	Kohat	MSc.LLB	08.08.1959	10.11.1987	15.08.2012	30.01.2013	30.01.2013	19.10.2015	
86.	Habibullah No. K/45	Bannu	BA	20.10.1957	20.10.1975	15.08.2012	30.01.2013	30.01.2013	19.10.2015	
87.	Muhammad Iqbal No. K/10	Peshawar	10th	02.02.1964	02.05.1985	15.08.2012	30.01.2013	30.01.2013	19.10.2015	
88.	Hussain Ghulam No. K/87	Hangu	BA	10.03.1970	10.08.1991	15.08.2012	30.01.2013	30.01.2013	19.10.2015	
89.	Muhammad Iqrar No H/29	Manshera	10th	11.02.1963	30.01.1982	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
90.	Farhad Ali No. H/30	Mardan	10th	16.11.1962	16.11.1980	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
91.	Azam Ali Shah No/ H/32	Abbottabad	10th	01.01.1963	23.08.1982	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
92.	Arshad Hussain No/ H/33	Shangla	10th	15.05.1967	13.12.1990	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
93.	Matloob Khan No/ H/34	Haripur	10th	13.04.1970	26.06.1988	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
94.	Shah Nawaz No. H/35	Manshera	FA	06.06.1967	26.12.1987	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
95.	Shad Muhammad No. H/36	Haripur	10th	31.03.1961	12.09.1981	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
96.	Raja Mukhtar No. H/49	Manshera	10th	05.04.1962	12.07.1980	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
97.	Fazal Wahab No. H/37	Mardan	10th	15.01.1965	27.10.1983	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
98.	Jehanzeb Khan No. H/39	Abbottabad	10th	30.11.1966	04.03.1985	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
99.	Muhammad Amin No. H/42	Abbottabad	10th	06.09.1962	15.11.1981	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
100.	Ihsan Shah No. H/44	Haripur	FA	17.05.1960	24.06.1979	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
101.	Muhammad Yousaf No H/46	Haripur	10th	24.08.1964	08.09.1982	31.08.2012	30.01.2013	30.01.2013	19.10.2015	

Syed Noman Ali Bukh
 Advocate
 Attested

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102.	Muhammad Sajjad No 11/47	Manshera	10th	24.03.1969	01.07.1983	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
103.	Fida Muhammad No H/48	Abbottabad	FA	11.12.1964	26.09.1988	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
104.	Zahoor Ahmed No M/127	Dir Lower	BA	01.01.1980	16.01.2001	12.09.2012	30.01.2013	30.01.2013	19.10.2015	
105.	Habib Ullah Khan No M/168	Dir Lower	FA	14.04.1973	19.08.1991	12.09.2012	30.01.2013	30.01.2013	19.10.2015	
106.	Fazal Dad No. P/181	Charsadda	MA	16.03.1966	22.03.1986	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
107.	Abdullah Jan No P/182	Peshawar	FA	24.10.1963	24.03.1984	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
108.	Gohar Khan No.P/183	Peshawar	FA	01.04.1964	24.03.1984	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
109.	Nasrullah Khan No P/185	Peshawar	FA	20.04.1968	24.09.1987	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
110.	Janan Habib No. P/186	Charsadda	10th	16.05.1964	11.02.1984	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
111.	Arshad Ahmed No P/187	Nowshera	MA,LLB	06.01.1982	05.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
112.	Muhammad Kanran No P/188	Malakand	MA	12.02.1981	12.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
113.	Sajid Mumtaz No. P/189	Charsadda	BA	27.12.1979	21.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
114.	Fida Hussain No.P/190	Peshawar	MA BSc	21.01.1983	21.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
115.	Ijaz Ali No. P/191	Charsadda	MBA	10.04.1983	22.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
116.	Zakullah No. P/192	Nowshera	BA	01.10.1965	13.12.1988	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
117.	Taj Muhammad Khan No P/193	Nowshera	MA	13.02.1979	28.12.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
118.	Ijaz Ali No. P/194	Charsadda	MA	14.05.1978	28.02.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
119.	Adnan Azam No P/195	Charsadda	FA	16.06.1984	28.02.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
120.	Zahid Alam No P/196	Peshawar	FSC	15.07.1987	28.02.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
121.	Rehnatullah No. P/197	Peshawar	FSc	07.03.1986	28.02.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
122.	Muhammad Iham Jan No MR/59	Mardan	MA	15.03.1979	12.10.2006	19.09.2012	30.01.2013	30.01.2013	19.10.2015	
123.	Luqman Khan No MR/80	Mardan	BA	15.01.1980	12.1.2006	19.09.2012	30.01.2013	30.01.2013	19.10.2015	
124.	Ikhtiraz Khan No. MR/81	Mardan	MA	14.01.1985	12.10.2006	19.09.2012	30.01.2013	30.01.2013	19.10.2015	
125.	Pir Zar Badshah No. MR/82	Mkd Agy	BA	25.05.1972	28.12.2006	19.09.2012	30.01.2013	30.01.2013	19.10.2015	
126.	Muhammad Fazil No. MR/83	Mardan	MA	03.12.1978	28.12.2006	19.09.2012	30.01.2013	30.01.2013	19.10.2015	
127.	Imtiaz Ali No. MR/84	Mardan	MA	03.01.1977	28.12.2006	19.09.2012	30.01.2013	30.01.2013	19.10.2015	
128.	Ghazi Marjan No. D/17	D.I Khan	10th	02.01.1962	26.07.1980	13.12.2012	30.01.2013	30.01.2013	19.10.2015	
129.	Said -ul-Amin No. 195/M	Mkd: Agy	FA	10.03.1961	10.10.1979	10.08.2012	13.08.2013	31.10.2013	31.10.2015	
130.	Bashir Ahmad No 223/M	Swat	10th	10.01.1967	28.06.1986	04.07.2013	13.08.2013	31.10.2013	31.10.2015	
131.	Naseeb Shah No M/283	Mkd: Agy	10th	17.04.1968	26.06.1986	04.07.2013	13.08.2013	31.10.2013	31.10.2015	Assigned revised seniority vide Endst No 2668-93/E-II, dated 17.12.2015
132.	Muhammad Zaman No M/304	Dir Lower	BA	23.06.1961	26.06.1999	04.07.2013	13.08.2013	31.10.2013	31.10.2015	Assigned revised seniority vide Endst No.2668-93/E-II, dated 17.12.2015


 Advocate
 Attested



36702

ایڈوکیٹ:
بار کونسل ایسوی ایشن نمبر: ۱۶۶۶-۰۹۱
رباط نمبر: ۰۳۴۲-۹۰۰۰۵۵۲

پشاور بار ایسوی ایشن، خیبر پختونخواہ

بعدالت جناب: مسٹر. یونیٹ خبیر خٹون خواہ

مختار دستخط بنام	دعویٰ: علت نمبر: مورخ: جرم: حقانہ:
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بائیث تحریر آنکھے

مقدمہ مندرجہ عنوان بالائیں انی طرف سے واسطے پیروی و جواہر دی کاروائی متعلقہ آن مقام کے علیحدہ مختار کی وجہ پر خاری کی مدد و مدد حاصل کر کر کوکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی اکل کاروائی کا کامل اختیار ہو گا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ برخلاف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی قدمی زریں پر دستخط کرنے کا اختیار ہو گا، نیز بصورت عدم پیروی یا ذگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل گرانی و نظر ثانی و پیروی کرنے کا مختار ہو گا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہو گا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہو گا دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہو گا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

الرقم: ۰۹/۵/۰۸.

العہد بد
مقام
کے لیے منظور ہے۔
Accepted.

نوٹ: اس وکالت نامہ کی فتوکاری ناقابل قبول ہو گی۔

To The Director
 Police Training School,
 Swat

Subject **7TH ADVANCE COURSE FOR INSPECTORS**

Memo:

As per Standing Order No.3/2016 & Amendments in Police Rule 2017
 C.O.A.O. 7th Advanced Course of 14 weeks duration for Inspectors of Khyber Pakhtunkhwa Police
 is mandatory requirement for the rank of DSP has been scheduled from 05.03.2018 in
 Training Centre Swat.

The following Inspectors of different regiments/s are hereby selected for the

Course as per below only

S No	Name	Present Posting
1	A.T. Nawaz No. 51123	Marwat Regt
2	Mujahid Khan No. 10103	STD Investigation
3	Mohammad Sadiq No. 51102	STD
4	Ahsan Zaman No. 51151	Marwat Regt
5	Jafar Shah No. P.173	KCP Peshawar
6	Ahsan Riaz No. P.170	Marwat Regt
7	Riaz Khan No. P.170	KCP Peshawar
8	Nasirullah No. 51152	Marwat Regt
9	Fazal Ahmad No. 51153	KCP Peshawar
10	Abdul Wali No. P.171	Marwat Regt
11	Fayyaz Hussain No. P.172	KCP Peshawar
12	Waseem Khan No. 51155	Marwat Regt
13	Zain Khan No. M.102	Marwat Regt
14	Bilal Khan No. M.103	Marwat Regt
15	Nasirullah No. 51156	Marwat Regt
16	A. Khan No. 51157	Marwat Regt
17	Ahsan Iqbal No. M.104	Marwat Regt
18	Mohammed Aslam No. M.105	Marwat Regt
19	Shahid Ali No. 51158	Marwat Regt
20	Mohammed Ali No. 51159	Marwat Regt
21	Mohammed Ali No. 51160	Marwat Regt
22	Mohammed Ali No. 51161	Marwat Regt
23	Mohammed Ali No. 51162	Marwat Regt
24	Mohammed Ali No. 51163	Marwat Regt
25	Ahsan Hussain No. H.92	Marwat Regt
26	Ahsan Hussain No. H.93	Marwat Regt

All Recommended Inspector Requested to report on or before 04.03.2018

Please do go through the attached document for further information
 and contact address for any query regarding the course.

ISALMAN CHAUDHRY
 Director General of
 Police Training
 Khyber Pakhtunkhwa Police

- For any further information please contact to the
 following persons:
 1. Addl Inspector General of Police - OIC Khyber Pakhtunkhwa
 2. Addl Inspector General of Police - Special Branch Khyber Pakhtunkhwa
 3. Addl Inspector General of Police - Investigation, Khyber Pakhtunkhwa
 4. Capital City Police Officer Peshawar
 5. Inspector General of Police - STD Khyber Pakhtunkhwa
 6. Inspector General of Police - KPK