

22:09.2022

Appellant in person present.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Israr Shah Reader for respondents present.

Representative of respondents submitted reply/comments which is placed on file. Copy of which was handed over to appellant. To come up for rejoinder, if any, and arguments on 16.11.2022 before D.B at Camp Court, Abbottabad.

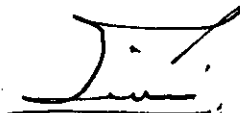


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

21.12.2021

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asst. AG for respondents present.

Notices to the respondents have not been issued, therefore, notices be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments before S.B on 17.02.2022 at camp court Abbottabad.



(Salah Ud Din)

Member(J)

Camp Court Abbottabad

17-2-22.

Due to retirement of worthy chairman case is adjourned. To come up for the same on 21-7-22.

Raza

21.07.2022

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney present.

Previous date was changed on Reader Note, therefore, notices be issued to the respondents through registered post and to come up for submission of written reply/comments on 22.09.2022 before the S.B at Camp Court Abbottabad.



(Salah-Ud-Din)

Member (J)

Camp Court Abbottabad

21.05.2021

Due to cancellation of tour, Bench is not available. Therefore, case is adjourned to 28.09.2021 for the same as before.

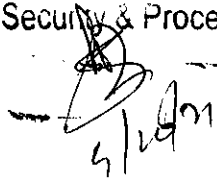

Reader

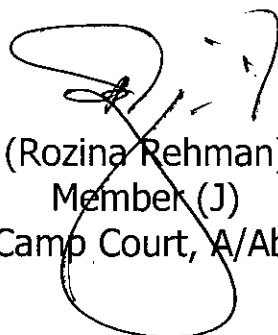
28.09.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments in the office within 10 days of the receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21 / 12 / 2021 before D.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee


4/12/21

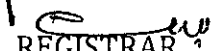


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1416 /2021 21

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/01/2021	<p>The appeal of Mr. Faisal Hafeez presented today by Mr. Muhammad Aslam Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>21-05-2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal No. 1416.....

Faisal Hafeez Sub. Inspector No. H-27, presentably posted SI/PO
Motor Way Sector E-35 Bear-1, Haripur.

Appellant

VERSUS

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

Respondents

SERVICE APPEAL

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3.	Order dated 25-03-2014	"B"	14
4.	Order dated 08-09-2015	"C"	15
5.	Seniority List "E" dated 08-12-2015	"D"	16-18
6.	Suitability Report.	"E"	19
7.	Order dated 10-10-2017	"F"	20-21
8.	Appeal dated 25-10-2017	"G"	22-24
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Through

Dated: 21 -01-2021


Appellant

(Mohammad Aslam Tanoli)
Advocate High Court
at Haripur

①

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal No.....

Faisal Hafeez Sub. Inspector No. H-27, presentably posted SI/PO
Motor Way Sector E-35 Bear-1, Haripur.

Appellant

VERSUS

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

Respondents

**SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL
ACT 1974 AGAINST ORDER DATED 02-12-2020 (DELIVERED ON 15-
01-2021) PASSED BY PROVINCIAL POLICE OFFICER KPK PESHWAR
WHEREBY APPELLANT'S DEPARTMENTAL AGAINST REVISED
SENIORITY LIST "F" OF INSPECTORS AND SUB INSPECTORS DATED
24-07-2020 IN WHICH APPELLANT'S NAME WAS PLACED AT
S/NO. 1098 INSTEAD OF 851 HAS BEEN REJECTED.**

**PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL ORDER
DATED 02-12-2020 OF RPO KPK PESHAWAR MAY GRACIOUSLY BE
SET ASIDE AND REVISED LIST "F" DATED 24-07-2020 MAY KINDLY
BE MODIFIED TO THE EXTENT OF APPELLANT AND HIS NAME BE
PLACED AT S/NO. 851 INSTEAD OF 1098 ABOVE THE NAME OF
SUB. INSPECTOR NADIR KHAN H/221 BY GRNATING THROUGHOUT
SENIORITY, CONFIRMATION AND PROMOTION AT RIGHT PLACE
SINCE CONFIRMATION ORDER 10-10-2017 OF SUB INSPECTORS
WAS ISSUED.**

Respectfully Sheweth:-

1. That appellant along with others on provincial level against 25% quota reserved for direct appointment was inducted in the police department as Probationer Assistant Sub Inspector through Public Service Commission vide Regional Police Officer, Hazara

②

Region, Abbottabad order dated 07-02-2011. **(Copy of order dated 07-02-2011 is as Annexure- "A")**.

2. That on successful and satisfactory completion of 03 years probationary period, the appellant was confirmed in the rank of Assistant Sub Inspector with effect from 07-02-2011 by the Regional Police Officer, Hazara Region, Abbottabad vide order dated 25-03-2014. Appellant's name stands at S/No.1 above the name of Nadir Khan ASI H/127. **(Copy of order dated 25-03-2014 is attached as Annexure -"B")**.
3. That appellant was promoted as Officiating Sub Inspector vide order dated 08-09-2015 and his name was placed at S/No. 15, above the name of Nadir Khan ASI H/127. **(Copy of order dated 08-09-2015 is attached as Annexure-"C")**.
4. That thereafter the appellant along with other colleagues was brought on the **Seniority List "E"** of Officiating Sub Inspectors and Assistant Sub Inspectors of Hazara Region Abbottabad issued vide order dated 08-12-2015. The name of appellant is shown at S/No. 207 of the list, above the name of SI Nadir Khan H/127. **(Copy of seniority list "E" dated 08-12-2015 is attached as Annexure-"D")**.
5. That before confirmation of Sub Inspectors, their suitability report was sought by the Regional Police Officer, Hazara Region, Abbottabad from their respective DPOs. The appellant was declared suitable

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by his DPO concerned and furnished his recommendations. **(Copy of Suitability report is attached herewith as Annexure-"E").**

6. That while the Regional Police Officer, Hazara Region, Abbottabad confirming his colleagues in the Rank of Sub Inspectors, appellant's junior SI Nadir Khan H/127 was confirmed and allotted a new number as H/122 and his name is placed at S/No. 60 of the order dated 10-10-2017 ignoring the appellant without any reason and justification despite the fact that he fulfilled all requisite qualifications including suitability report. There was nothing adverse on record against the appellant thus he was eligible to be confirmed in the rank of Sub Inspector with his colleagues. **(Copy of order dated 10-10-2017 is attached as Annexure-"F").**
7. That aforementioned order of the Regional Police Officer, Hazara Region, Abbottabad was appealed against by appellant through departmental appeal dated 25-10-2017 before the PPO KPK Peshawar. **(Copy of appeal dated 25-10-2017 Attached as Annexure-"G").**
8. That appellant was ultimately confirmed as Sub Inspector by the Regional Police Officer, Hazara Region, Abbottabad vide order dated 24-05-2018 and his name is placed at S/No. 18 of this order. **(Copy of order dated 24-05-2018 is attached as Annexure-"H").**

9. That in the Notification dated 11-01-2019 regarding admission to list "F" of KPK Sub Inspectors for publication, the name of appellant's junior SI Nadir Khan H/221 has been mentioned at S/No. 202 while ignoring the appellant without any reason and justification. **(Copy of Notification dated 11-01-2019 is attached herewith as "I")**.
10. That appellant challenged the above mentioned Notification through representation dated 10-02-2019 which was forwarded to the Inspector General of Police KPK Peshawar vide covering letter dated 07-03-2019 of the Commandant, Police Training College Hangu. **(Copies of representation dated 10-02-2019 and letter dated 07-03-2019 are as Annexure-"J & K")**.
11. That now appellant has been placed at S/No. 1098 instead of 851 of revised seniority list "F" of KPK Inspectors issued on 24-07-2020. While appellant's junior SI Nadir Khan 221/H is placed above him at S/No. 851 of the list. The appellant has been made far junior to his juniors causing colossal damage in service career without any reason and justification. **(Copy of seniority list "F" of Inspectors and Sub Inspectors of KPK dated 24-07-2020 is attached as Annexure- "L")**.
12. That aforementioned seniority list "F" dated 24-07-2020 was neither circulated to the appellant nor was its copy provided to him despite repeated requests and he had to collect the same through his personal enthusiastic efforts. Since 2017 the appellant is running

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from pillar to post for his legitimate right of confirmation, seniority and promotion. He had to submit repeated departmental appeals but all in vain. Neither his genuine appeals/representations nor requests were responded nor was his case settled. Appellant's case is that of hardships when his requests, appeals and representations are not responded to which departmental authorities are legally bounded under the law, departmental rules and regulation and principle of natural justice.

13. That appellant preferred an appeal dated 20-10-2020 against above revised seniority list "F" which the the PPO KPK Peshawar without solving appellant's grievance turned down representation/ appeal vide order dated 02-12-2020 delivered on 15-01-2021 on the specific request of appellant. **(Copies Appeal dated 20-10-2020, order dated 02-12-2021 and application 15-01-2021 are as Annexure-"M,N&O")**. Hence instant service appeal, inter alia, on the following:-

GROUND:

- a) That impugned "F" LIST dated 24-07-2020 and dated 02-12-2020 of the respondents are illegal, unlawful against the facts, departmental rules and regulations and principle of natural justice hence are liable to be modified/set aside.

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- b) That appellant was due to have been placed in revised seniority list "F" dated 24-07-2020 at S/No. 851 instead of 1098 above the name of his junior SI Nadir Khan H/221 and by modifying all orders of confirmation, seniority and promotion onward since confirmation order of Sub Inspectors dated 10-10-2017 when appellants juniors were confirmed in the rank of Sub Inspector alongwith his colleagues and batch-mates by the Regional Police Officer, Hazara Region, Abbottabad as he fulfilled all requisite conditions and his suitability report was furnished by his District Police Officer Haripur. Even there was nothing adverse against appellant and he had successfully and satisfactorily completed his probation period. But the appellant was deferred from his due confirmation without any reason and justification which caused tremendous loss in seniority and subsequent promotions to the appellant in his service career.
- c) That respondents have not treated the appellant in accordance with law, departmental rules & regulations and policy on the subject and have acted in violation of Article-4 of constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned order, which is unjust, unfair hence not sustainable in the eyes of law.
- d) That appellate authority has also failed to abide by the law and even did not take into consideration the grounds taken by appellant in the memo of appeal and has filed the appeal. Thus act of respondent is contrary to the law

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as laid down in the KPK Police Rules 1934 read with section 24-A of General Clause Act 1897 and Article 10-A of the Constitution of Islamic Republic of Pakistan 1973.

- e) That appellant has discharged his assigned duties with devotion, dedication and honesty to the entire satisfaction of his officers.
- f) That appellant deserves to be confirmed in the rank of Sub Inspector alongwith his colleagues and batch-mates by modifying confirmation order dated 10-10-2017 with consequential relief of seniority and promotion throughout at right place.
- g) That instant appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain and adjudication upon the same.

PRAYER:

It is, therefore, humbly prayed that on acceptance of instant Service Appeal order dated 02-12-2020 may kindly be set aside and revised seniority list "F" dated 24-07-2020 be modified to the extent of appellant to bring his name at S/No. 851 instead of 1098 above the name of his junior SI Nadir Khan H/221 and also modifying all orders of confirmation, seniority and promotion onward since confirmation order of Sub Inspectors dated 10-10-2017 with grant of all consequential service back

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benefits. Any other relief which this Honorable Service Tribunal deems fit and proper in circumstances of the case may also be granted.

Through:


Appellant


M. Aslam
(Mohammad Aslam Tanoli)
Advocate High Court
At Haripur

Dated 21-10-2020

VERIFICATION

It is verified that the contents of instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed thereof.

Dated 21-01-2021


Appellant

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**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Faisal Hafeez Sub. Inspector No. H-27, presentably posted SI/PO
Motor Way Sector E-35 Bear-1, Haripur.

Appellant

VERSUS

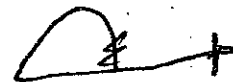
1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL

AFFIDAVIT:

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



Deponent/Appellant

Dated: 21-01-2021

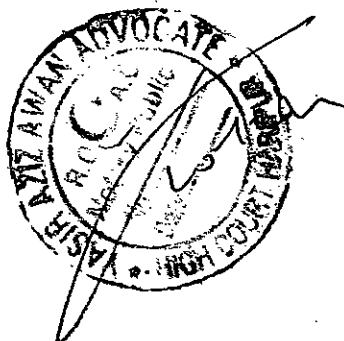
Identified By:



Mohammad Aslam Tanoli
Advocate High Court
At Haripur



Appellant



10

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Faisal Hafeez Sub. Inspector No. H-27, presentably posted SI/PO
Motor Way Sector E-35 Bear-1, Haripur.

Appellant

VERSUS

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

Respondents

SERVICE APPEAL

CERTIFICATE

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


APPELLANT

Dated: 21-01-2021

11

BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Faisal Hafeez Sub. Inspector No. H-27, presentably posted SI/PO Motor Way Sector E-35 Bear-1, Haripur.

Appellant

VERSUS

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

APPLICATION FOR CONDONATION OF DELAY IN FILING SERVICE APPEAL BEFORE THIS HONOURABLE SERVICE TRIBUNAL.

Respectfully Sheweth:

5. That applicant/appellant has filed today a Service Appeal, which may be considered as part and parcel of this application, against order dated 24-07-2020 and 02-12-2020 but copy of the same was provided on 15-01-2021 passed by respondents, whereby respondents denied the appellant his due confirmation in the rank of Sub Inspector alongwith his colleagues and bate-mates and consequent seniority and promotion and his representation was rejected.
6. That as the orders of departmental authorities have been passed in violation and derogation of the statutory provisions governing the terms and condition of service of the appellant and facts of the case, therefore, causing a recurring cause of action to the applicant/appellant can be challenged and questioned irrespective of a time frame.
7. That though the appellant on receipt of order of the Regional Police Officer Hazara Region Abbottabad had filed departmental representation but was rejected. That appellant has rigorously been pursuing his case. Therefore, the delay, if any, in filing instant service appeal is due to the forgoing reasons.
8. That instant application is being filed as an abundant caution for the condonation of delay, if any. The impugned orders are liable to be set aside in the interest of justice.

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

Through:


Applicant/Appellant

M. Aslam
(Mohammad Aslam Tanoli)
Advocate High Court
Haripur

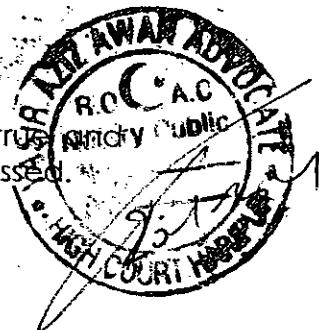
Dated: 21-01-2021

Affidavit:

It is verified that the contents of the instant application/ appeal are true and correct to the best of my knowledge & belief & nothing has been suppressed.

Dated: 21-01-2021


Applicant/Deponent



12

Annex. A

ORDER

In pursuance of Provincial Police Officer, Khyber Pakhtunkhwa Peshawar memo: No. 28334-40/E-II dated 27-12-2010 and 251-53/E-II dated 04-01-2011.

The following 27 candidates are hereby appointed as Probationer Assistant Sub-Inspector in BPS No. 09 (3820-230-10720) against 25% quota reserved for direct appointment in Police department in the existing vacancies with effect from the date when they assume the charge of their higher responsibility subject to their medical fitness.

They are posted to the district as noted against each their names:-

S.No	Name	Father's Name	Address	Name of district to Home attached
01	Aamir Hussain	Muhammad Nazir	Vill: Maswal Distt: Mansehra	Mansehra
02	Syed Asim Imam Bukhari	Syed Rafique Hussain Shah	Vill: & PO Khairabad Teh: Balakot Distt: Mansehra	Mansehra
03	Yasir	Bakhtiar Khan	Vill: & PO Khaki Teh: & Distt: Mansehra	Mansehra
04	Assad	Muhammad Farooq	Moh: Girls High School No. 1 Mansehra	Mansehra
05	Amir Ashfaq	Ashfaq Ahmed	Vill: & PO Tatar Distt: Mansehra	Mansehra
06	Hadi Paristan	Paristan Khan Tanoli	Pakhwal Road Mansehra	Mansehra
07	Nasir Khan	Abdullah Khan	Moh: Khana Vill: Bher Kund Mansehra	Mansehra
08	Anas	Abdul Jalil	Vill: Sughdar PO Ghari Habibullah Teh: Balakot Distt: Mansehra	Mansehra
09	Tahir Iqbal	Muhammad Iqbal	Vill: Katha Dobandi Ghari Habibullah Mansehra	Mansehra
10	Nadir Khan	Shamrez Khan	Moh: Shoaib Zai Nawanshehr Abbottabad.	Abbottabad
11	Noman Javed	Javed Iqbal	Moh: Kuli Khan Upper Malikpura Abbottabad.	Abbottabad
12	Sardar Tahir Saleem	Sardar Saleem Zahoor	Balquis Town Kaghan Colony Mandian Abbottabad.	Abbottabad
13	Wajid Hussain	Muhammad Ashraf	Vill: & Po Namli Maira Abbottabad	Abbottabad
14	Shahzad Khan	Jamshid Khan	Moh: Khalil Zai Nawanshehr Abbottabad	Abbottabad
15	Mehtab Nazir	Muhammad Nazir	C/O Sohail Stationery Opp: Govt: Girls College Mandian Abbottabad	Abbottabad
16	Khizar Khan Jadoon	Muhammad Asif Khan Jadoon	Vill: Ghumanwan Nawanshehr Abbottabad	Abbottabad
17	Faisal Hafeez	Hafeez-ur-Rehman	Vill: Sikandarpur Distt: Haripur	Haripur
18	Muhammad Saddique	Ali Ahmed	Vill: Sirikot The: Ghaza Distt: Haripur	Haripur
19	Ejaz Ali	Shah Saood	Vill: Nara Amazai The: Ghazai Haripur	Haripur

Attested
Noman

13

	Ghazanfar Ali	Qamar Zia Turabi	Ghazanfar House Fort Road Haripur	Haripur
	Arshad Iqbal	Sarfraz Khan	Vill: Tailoos The: Allai Distt; Battagram	Battagram
	Syed Imtiaz Ali Shah	Muhammad Sahib Shah	Vill; And PO Pir Hari Distt: Battagram	Battagram
23	Muhammad Imtiaz Khan	Sabir Khan	Vill: Khoshi PO Komila Teh: Dassu Distt: Kohistan	Kohistan
24	Muhammad Haque Hashmi	Muhammad Shir	Vill: Sholgara PO Ranolia Teh: Pattan Distt: Kohistan	Kohistan
25	Khalil ur Rehman	Abdul Qader	PO Komila Teh: Dassu Distt: Kohistan	Kohistan
26	Muhammad Nawaz	Ghulam Sarwar	Vill: Gaddar PO Shekhanabad Teh: Pallas Distt* Kohistan	Kohistan
27	Sheryar	Tariq Masood	Vill: Malkiyar Distt: Haripur.	Haripur

They should be directed to report at PTC, Hangu for training in accordance with P.R-19-25.

[Signature]
Deputy Inspector General of Police
Hazara (Abbottabad)

No. 1652-58 /E dated Abbottabad the 07/02/2011.
Copy of above is forwarded for information and necessary action to the:-

1. Provincial Police Officer Khyber Pahktunkhwa, Peshawar with reference to his memo: quoted above.
2. All District Police Officer, Hazara Region. Necessary Gazette/ Notification may be issued accordingly and their character Roll Dossier be prepared. The applications alongwith other relevant record are also enclosed.
3. OS/AS Region Office Abbottabad.

Attested
[Signature]
[Signature]

14/12

Annex 'B'

Phone No. 0992-9310021
Fax No. 0992-9310023

ORDER

On completion of probation period satisfactorily, the following Probationer ASIs of Haripur and Abbottabad Districts are hereby confirmed as ASI from the date of their appointment as Probationer ASIs i.e.07-02-2011 and their names brought on promotion list "E" with immediate effect:-

S. NO	NAME & NO.	DISTRICT
01	Faisal Hafeez No.159/H	Haripur
02	Nadir Khan No.127/H	Abbottabad
03	Noman Javed No.121/H	Abbottabad
04	Sardar Tahir Saleem No.131/H	Abbottabad
05	Khizar Khan Jadoon No.158/H	Abbottabad
06	Wajid Hussain No.141/H	Abbottabad
07	Sheryar No.289/H	Haripur
08	Shahzad Khan No.142/H	Abbottabad
09	Mehtab Nazir No.144/H	Abbottabad
10	Muhammad Saddique No.161/H	Haripur
11	Ejaz Ali No.212/H	Haripur

JE

A

Regional Police Officer,
Hazara Region (Abbottabad)
(AEC Dilawar)

No. 4566-67 /E, Dated Abbottabad the 25-03-2014.

Copy of above alongwith Service Rolls are returned herewith for necessary action to the:-

1. District Police Officer, Abbottabad.
2. District Police Officer, Haripur.
3. OS/AS Region Office Abbottabad.

Gazette Notification may also be issued accordingly.

Attested
[Signature]

Noman

In the office of
1st TD, WPT, Fard
Rank of officer: ASI

- 32 ASI Amir Ashfaq No.72/H
- 33 ASI Hadi Paristan No.86/H
- 34 ASI Nasir Khan No.94/H
- 35 ASI Anas No.116/H
- 36 ASI Tahir Iqbal No.118/H
- 37 ASI Khail-ur-Rehman No.295/H
- 38 ASI Muhammad Nawaz No.296/H
- 39 ASI Rustam Khan No.385/H
- 40 ASI Muhammad Riaz No.387/H
- 41 ASI Zahir Khan No.388/H
- 42 ASI Muhammad Nawaz No.390/H

- Operational Wing Mansehra
- Operational Wing Mansehra
- Operational Wing Mansehra
- Operational Wing Mansehra
- Operational Wing Mansehra
- Operational Wing Abbottabad
- Operational Wing Mansehra
- CTD Hazara
- CTD Haripur
- CTD Kohistan
- I/C Min Operation Room RPO Office

[Signature]
Regional Police Officer,
Hazara Region Abbottabad
(A/C Ditawar)

No. 14528-41 /E, dated Abbottabad the 08-08-2015

Copy of above is forwarded for information and necessary

action to the:-

1. Additional Inspector General of Police / Commandant Elite Force Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police CTD Khyber Pakhtunkhwa Peshawar.
3. All District Police Officers in Hazara Region.
4. Superintendents of Police Investigation Abbottabad & Mansehra.
5. Superintendent of Police CTD Hazara Abbottabad.
6. Superintendent of Police ^{Elite Force} Hazara Abbottabad.

(Necessary Gazette Notification may be issued accordingly)

SRC/PO
for n/a action PR

DPD/HR
11/9/15



SRC

(15)

Phone No. 0992-9310021
Fax No. 0992-9310023

Annex-C

ORDER

Consequent upon the recommendation of promotion board held in the office of the undersigned on 27-08-2015, the following confirmed ASIs on list "E" were found suitable for promotion as such they are hereby promoted to the rank of officiating Sub-Inspectors with immediate effect.

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

S #	NAME AND NO.	PRESENT POSTING
01	ASI Mehboob-ur-Rehman 352/H	CTD Mansehra
02	ASI Zakir Hussain Shah No.372/H	Investigation Wing Abbottabad
03	ASI Muhammad Aslam No.373/H	CTD Battagram
04	ASI Wajid Ali No.374/H	Operational Wing Lower Kohistan
05	ASI Abdul Jalil No.375/H	Operational Wing Haripur ✓
06	ASI Amjad Ali No.376/H	Operational Wing Battagram
07	ASI Dil Pazir No.377/H	Operational Wing Abbottabad
08	ASI Muhammad Pervez No.378/H	Operational Wing Abbottabad
09	ASI Arshad Khan No.379/H	Operational Wing Haripur ✓
10	ASI Muhammad Bilal No.380/H	Operational Wing Torghar
11	ASI Muhammad Razaq 381/H	CTD Mansehra
12	ASI Safdar Zaman No.382/H	CTD Haripur
13	ASI Muhammad Nawaz No.383/H	Investigation Wing Mansehra
14	ASI Hajab Khan No.384/H	CTD Torghar
15	ASI Faisal Hafeez No.159/H	Operational Wing Abbottabad
16	ASI Nadir Khan No.127/H	Operational Wing Abbottabad
17	ASI Noman Javed No.121/H	Operational Wing Haripur ✓
18	ASI Sardar Tahir Saleem No.131/H	Operational Wing Abbottabad
19	ASI Aamir Hussain No.37/H	Operational Wing Mansehra
20	ASI Khizar Khan Jadoon No.158/H	Investigation Wing Abbottabad
21	ASI Wajid Hussain No.141/H	Operational Wing Abbottabad
22	ASI Shehryar No.289/H	Operational Wing Haripur ✓
23	ASI Shahzad Khan No.142/H	Elite Force Peshawar
24	ASI Mehtab Nazir No.144/H	Operational Wing Abbottabad
25	ASI Muhammad Saddique 161/H	Operational Wing Haripur ✓
26	ASI Ejaz Ali No.212/H	Operational Wing Haripur ✓
27	ASI Syed Asim Imam Bukhari No.57/H	Operational Wing Mansehra
28	ASI Yasir No.60/H	Operational Wing Mansehra
29	ASI Assad No.62/H	Operational Wing Mansehra
30	ASI Syed Imtiaz Ali Shah 292/H	Operational Wing Battagram
31	ASI Muhammad Imtiaz Khan No.293/H	CJD HQrs Hazara

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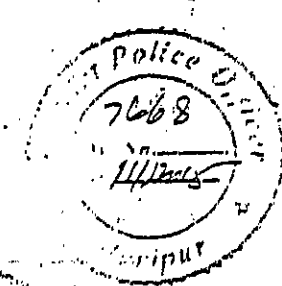
SENIORITY LIST OF OFFICIATING SUB-INSPECTORS AND ASSISTANT SUB-INSPECTORS

Subject:- **SENIORITY LIST**

The seniority list of the following Officiating Sub-Inspectors and Assistant Sub-Inspectors on Promotion list E

S #	Name & No	Home District	D/O Birth	D/O Appoint:	Edu	D/O Prom: as ASI	D/O Conf: as ASI	Name brought on promotion List E	D/O Prom: as SI	Remarks
1	SI Muhammad Nazir 78/H	Mansehra	20-12-1955	01-11-1975	9 th	05-05-1992	20-10-2001	20-10-2001	17-11-2001	CTD Hazara
2	SI Muhammad Iqbal H/04	Mansehra	01-01-1959	02-03-1977	FA	09-08-1995	20-10-2001	20-10-2001	26-04-2003	CTD Hazara
3	SI Amjid No.H/02	Abbottabad	13-05-1963	20-11-1980	10 th	16-01-1998	01-07-2003	01-07-2003	16-02-2002	Operation Torghur
4	SI Muhammad Ishtiaq H/45	Abbottabad	04-02-1956	23-09-1974	10 th	28-04-2000	02-06-2004	02-06-2004	14-02-2006	Operation Haripur
5	SI Abdul Wahed H/110	Abbottabad	10-02-1956	19-04-1974	9 th	03-03-2001	02-06-2004	02-06-2004	14-02-2006	Investigation Haripur
6	SI Raj Muhammad 163/H	Abbottabad	02-03-1956	10-09-1974	10 th	17-11-2001	02-06-2004	02-06-2004	06-12-2006	CTD Hazara
7	SI Taj Muhammad 164/H	Mansehra	04-03-1957	22-10-1975	10 th	17-11-2001	02-06-2004	02-06-2004	06-12-2006	CTD Hazara
8	SI Muhammad Afzal H/111	Haripur	18-02-1956	30-10-1975	10 th	17-11-2001	02-06-2004	02-06-2004	06-12-2006	Investigation Haripur
9	SI Rafi-uz-Zaman H/112	Mansehra	12-04-1956	01-09-1974	9 th	17-11-2001	02-06-2004	02-06-2004	06-12-2006	Operation Haripur
10	SI Mushtaq Ahmed 167/H	Haripur	04-01-1956	17-09-1974	10 th	17-11-2001	02-06-2004	02-06-2004	06-12-2006	SB Peshawar
11	SI Gulzar Khan H/113	Abbottabad	21-12-1956	24-09-1975	FA	17-11-2001	02-06-2004	02-06-2004	06-12-2006	Investigation Abbottabad
12	SI Khalid Pervez H/114	Mansehra	13-04-1957	01-01-1970	9 th	17-11-2001	06-04-2006	06-04-2006	06-12-2006	CTD Hazara
13	SI Sardar Ajmal No.H/115	Mansehra	07-02-1957	09-06-1981	FA	17-11-2001	06-04-2006	06-04-2006	08-08-2007	Investigation Haripur
14	SI Ali Akbar H/116	Mansehra	17-06-1958	18-06-1977	6 th	17-11-2001	06-04-2006	06-04-2006	08-08-2007	Investigation Abbottabad
15	SI Fazal Dad H/117	Abbottabad	03-04-1956	05-09-1975	FA	17-11-2001	06-04-2006	06-04-2006	08-08-2007	Operation Abbottabad
16	SI Hamid Ali 184/H	Abbottabad	01-03-1957	07-05-1975	10 th	17-11-2001	06-04-2006	06-04-2006	08-08-2007	ACE Peshawar
17	SI Muhammad Nazir 76/H	Mansehra	02-01-1959	-	9 th	17-11-2001	06-04-2006	06-04-2006	23-10-2007	SB Peshawar
18	SI Muhammad Nazir 76/H	Mansehra	02-01-1959	-	9 th	17-11-2001	06-04-2006	06-04-2006	23-10-2007	SB Peshawar

SKL
for 11/12/15



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officer found

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202	SI Muhammad Bilal No.380/H	Kohistan	03-03-1969	02-10-1991	10 th	20-10-2008	20-10-2010	20-10-2010	08-09-2015	Operational Benagram
203	SI Muhammad Razaq No.381/H	Mansehra	09-03-1962	08-07-1985	10 th	20-10-2008	20-10-2010	20-10-2010	08-09-2015	CTD Hazara
204	SI Safdar Zaman No.382/H	Haripur	25-04-1964	12-09-1983	10 th	20-10-2008	20-10-2010	20-10-2010	08-09-2015	CTD Hazara
205	SI Muhammad Nawaz No.383/H	Mansehra	18-03-1963	03-10-1985	10 th	20-10-2008	20-10-2010	20-10-2010	08-09-2015	Investigation Mansehra
206	SI Hajab Khan No.384/H	Kohistan	02-01-1970	30-03-1991	10 th	20-10-2008	20-10-2010	20-10-2010	08-09-2015	CTD Hazara
207	SI Faisal Hafeez No.159/H	Haripur	01-08-1987	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Abbottabad
208	SI Nadir Khan No.127/H	Abbottabad	03-06-1985	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Abbottabad
209	SI Noman Javed No.121/H	Abbottabad	16-05-1987	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Haripur
210	SI Sardar Tahir Saleem No.131/H	Abbottabad	18-08-1982	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Abbottabad
211	SI Aamir Hussain No.37/H	Mansehra	01-04-1983	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Mansehra
212	SI Khizar Khan Jadoon No.158/H	Abbottabad	02-02-1986	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Investigation Haripur
213	SI Wajid Hussain No.141/H	Abbottabad	15-01-1986	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Abbottabad
214	SI Shehryar No.289/H	Haripur	13-04-1985	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation U/Kohistan
215	SI Shahzad Khan No.142/H	Abbottabad	21-06-1986	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Elite Force Hazara
216	SI Mehtab Nazir No.144/H	Abbottabad	02-06-1989	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Abbottabad
217	SI Muhammad Saddique No.161/H	Haripur	03-03-1983	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Torghar
218	SI Ejaz Ali No.212/H	Haripur	20-03-1986	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation U/Kohistan
219	SI Syed Asim Imam Bukhari No.57/H	Mansehra	11-03-1982	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Mansehra
220	SI Yasir No.60/H	Mansehra	01-06-1983	07-02-2011	M.A	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation Mansehra
221	SI Assad No.62/H	Mansehra	10-04-1984	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation U/Kohistan
222	SI Syed Imtiaz Ali Shah No.223/H	Mansehra	03-04-1985	07-02-2011	--	07-02-2011	07-02-2011	25-03-2014	08-09-2015	Operation U/Kohistan

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326	ASI Muhammad Rafique No.209/H	Haripur	06-02-1971	03-10-1989	FA	23-02-2012	26-05-2014	26-05-2014		CTD KPK Peshawar
327	ASI Muhammad Yousof No.223/H	Mansehra	20-08-1964	29-12-1985	10th	23-02-2012	26-05-2014	26-05-2014	--	ACE KPK Peshawar
328	ASI Amjad Hussain No. 229/H	Mansehra	16-05-1971	18-04-1994	10 th	23-02-2012	26-05-2014	26-05-2014	--	Operation Mansehra
329	ASI Gul Waiz No. 250/H	Abbottabad	16-06-1968	22-06-1987	FA	23-02-2012	26-05-2014	26-05-2014	--	Investigation Abbottabad
330	ASI Gul Nawaz No. 231/H	Mansehra	24-02-1971	01-07-1989	10th	23-02-2012	26-05-2014	26-05-2014	--	Operational Mansehra
331	ASI Muhammad Iqbal No. 235/H	Abbottabad	08-03-1967	22-06-1987	10th	23-02-2012	26-05-2014	26-05-2014	--	Elite Force
332	ASI Muhammad Hamayun No.18/H	Mansehra	29-09-1971	08-08-1991	10th	08-06-2012	08-06-2015	08-06-2015	--	PTC Hangu

OFFICE OF THE REGIONAL POLICE OFFICER HAZARA ABBOTTABAD.

No. 20360-22 /EA, dated Abbottabad the 08 / 12 /2015.

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

1. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
2. Addl: Inspector General of Police, Elite Force Khyber Pakhtunkhwa Peshawar.
3. Deputy Inspector General of Police CTD / Special Branch / Traffic / Khyber Pakhtunkhwa Peshawar & Motorway Islamabad.
4. Director Anti Corruption Khyber Pakhtunkhwa Peshawar.
5. Commandant Police Training College Hangu.
6. All District Police Officer in Hazara Region.
7. All Senior Superintendent of Police, Investigation in Hazara Region.

Note:- The Police Officer (concerned) may be informed of their seniority position. If they are not satisfied with their seniority assigned to them, they should submit their representation within a period of 01 month after the issue of the list otherwise no representation will be accepted.


Attested
Noman
 Regional Police Officer
 No. 1177
 To: All
 Subject: All
 Metho: HR

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BATTER COPY

CONFIRMATION OF SI'S

S.NO	Name and No. of Officiating SIs	Date of Birth	Present Posting	Date of Promotion as Officiating SI's	Punishments Awarded		Good Entries	Date of Passing Upper Collage Course	Period of Posting as SHO/SB/INV/CTD/ Elite Force etc.	Course Pass as per standing order No. 03/2015	No Departmental Enquiry	Suitable for confirmation or not
					Major	Minor						
01	SI Faisal Hafeez No. 159/H	01.08.1987	Elite Command Course Nowsahera	08.09.2015	-	-	2	30.06.2017	SHO PS Sherwan 14.09.2015 to 18.03.2016 SHO PS Sazeen Kohistan 12.06.2016 to 12.01.2017	Nil	-	Remarks Signed by DPO Haripur
02	SINoman Javed No. 121/H	16.05.1987	Police Line	08.09.2015	-	-	-	30.06.2017	SHO PS KTS 05.10.2015 to 04.08.2016 SHO PS Sherwan 15.08.2016 to 23.02.2017	Nil	-	Remarks Signed by DPO Haripur

Attested

Noman

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Anwar. P

Phone No. 0992-9310021
Fax No. 0992-9310023

ORDER

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

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

S #	NAME AND NO.	PRESENT POSTING	ALLOTTED NEW REGION NUMBER
01	SI Muhammad Nazir No.76/H	Special Branch Peshawar	H/162
02	SI Muhammad Sarwar No.222/H	Abbottabad District	H/163
03	SI Muhammad Saleem No.232/H	Elite Force Hazara	H/164
04	SI Gulam Murtaza No.245/H	Elite Force Hazara	H/165
05	SI Zain Khan No.249/H	CTD Khyber Pakhtunkhwa	H/166
06	SI Muhammad Saeed No.3/H	Elite Force Hazara	H/167
07	SI Tanveer Ahmed No.122/H	CTD Khyber Pakhtunkhwa	H/168
08	SI Muhammad Yasin No.60/H	Special Branch Peshawar	H/169
09	SI Muhammad Sajjad No.67/H	Torghar District	H/170
10	SI Muhammad Khushal No.191/H	Mansehra District	H/171
11	SI Tariq Mehmood No.200/H	Abbottabad District	H/172
12	SI Muhammad Shakeel No.256/H	Elite Force Hazara	H/173
13	SI Muhammad Ali Khan No.268/H	Haripur District	H/174
14	SI Raja Mumtaz Ahmed No.270/H	CTD Khyber Pakhtunkhwa	H/175
15	SI Liaqat Ali No.29/H	Elite Force Hazara	H/176
16	SI Phul Hussain No.202/H	Haripur District	H/177
17	SI Ali Farran No.303/H	Abbottabad District	H/178
18	SI Gul Nawaz No.305/H	CTD Khyber Pakhtunkhwa	H/179
19	SI Khan Baz No.308/H	Upper Kohistan District	H/180
20	SI Abdul Rashid No.309/H	CTD Khyber Pakhtunkhwa	H/181
21	SI Muhammad Shafique No.310/H	Torghar District	H/182
22	SI Sherdad Khan No.314/H	Upper Kohistan District	H/183
23	SI Waqar Ali No.284/H	Mansehra District	H/184
24	SI Muhammad Farooq No.315/H	Abbottabad District	H/185
25	SI Abdul Wajid No.316/H	CTD Khyber Pakhtunkhwa	H/186
26	SI Murad Ali No.318/H	Special Branch Peshawar	H/187
27	SI Muhammad Javed No.319/H	Battagram District	H/188
28	SI Muhammad Nazir No.320/H	Battagram District	H/189
29	SI Naik Muhammad No.321/H	PTC Hangu	H/190
30	SI Anwar-ul-Iqbal No.322/H	CTD Khyber Pakhtunkhwa	H/191
31	SI Muhammad Hayat No.323/H	Battagram District	H/192
32	SI Noor Nabi Shah No.324/H	Upper Kohistan District	H/193
33	SI Muhammad Aslam No.325/H	PTC Hangu	H/194
34	SI Muhammad Aksar No.326/H	CTD Khyber Pakhtunkhwa	H/195
35	SI Javeed-ur-Rehman No.327/H	Special Branch Peshawar	H/196
36	SI Muhammad Aslam No.328/H	CTD Khyber Pakhtunkhwa	H/197
37	SI Akhtar Nawaz No.330/H	Mansehra District	H/198
38	SI Abdul Khaliq No.331/H	Mansehra District	H/199
39	SI Tasveer Hussain Shah No.332/H	Mansehra District	H/200
40	SI Abdul Hamid No.334/H	Mansehra District	H/201
41	SI Wazir Khan No.335/H	Traffic Police KPK	H/202

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17/10/17
S/O
Attested
Noman

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Phone No. 092-9310021
Fax No. 092-9310613

42	SI Khan Waiz No. 337/H	Mansehra District	11/203
43	SI Habib-ur-Rehman No. 341/H	Torghar District	11/204
44	SI Pervez No. 344/H	Abbottabad District	11/205
45	SI Niaz Muhammad No. 345/H	Mansehra District	11/206
46	SI Naeem Akhtar No. 288/H	PTS Mansehra	11/207
47	SI Muhammad Siraj No. 349/H	Lower Kohistan District	11/208
48	SI Abdul Sattar No. 353/H	Elite Force Hazara	11/209
49	SI Wase Khan No. 354/H	ACE Khyber Pakhtunkhwa	11/210
50	SI Sher Dil No. 356/H	Elite Force Hazara	11/211
51	SI Abdul Maroof No. 11/27	ACE Khyber Pakhtunkhwa	11/212
52	SI Sajid Farooq No. 84/H	Mansehra District	11/213
53	SI Muhammad Munir No. 329/H	Mansehra District	11/214
54	SI Abdul Hamid No. 373/H	Torghar District	11/215
55	SI Muhammad Rafique No. 371/H	Abbottabad District	11/216
56	SI Wajid Ali No. 374/H	Mansehra District	11/217
57	SI Abdul Jallil No. 375/H	Upper Kohistan District	11/218
58	SI Amjad Ali No. 376/H	Baltistan District	11/219
59	SI Muhammad Nawaz No. 383/H	Mansehra District	11/220
60	SI Hadir Khan No. 127/H	Abbottabad District	11/221

Regional Police Officer,
Hazara Region Abbottabad
(AEC Division)

No. 23242-63, dated Abbottabad the 10-10-2017

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

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

(Necessary Gazette Notification may be issued accordingly)

Attested
[Signature]
K. M. Khan

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Annex-9

To

The worthy Provincial police Officer
Khyber Pakhturkhawa,
Peshawar.

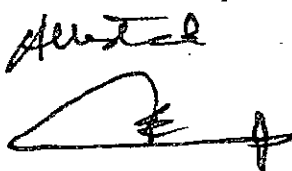
Subject: REPRESENTATION AGAINST THE DECISION OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON 02-10-2017 VIDE ORDER NO. 23242-63/E DATED 10-10-2017 WHEREBY HE PETITIONER WAS NOT CONFORMED AS SUB-INSPECTOR ILLEGALLY, SUPER SIDED AND AGAINST THE FACTS AND JUNIOR OFFICERS WERE CONDIRMED WHERE AS THE PETTIONER WAS DEFERRED WITHOUT LAWFUL JUSTIFICATION.

Prayer: On acceptance of this representation, the DPC dated 09-10-2017 regarding the confirmation of Sub-Inspector may kindly be set aside ad the petitioner may kindly be confirmed in the rank of Sub-Inspector as per seniority of petitioner with all back benefits and consequential relief.

Respected Sir,

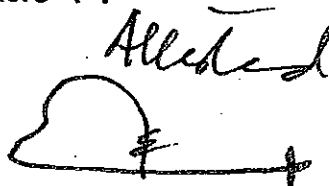
The petitioner/appellant submits as under:-

1. That the petitioner was selected through KPK PSC as Probationer ASI on 07-02-2011 (copy of worthy RPO Hazard Regional Order No. 1652-58/E dated 07-02-2011 is attached as Annexure "A").
2. That the petitioner was sent to PTC Hungu to under the PASI Course at PTC Hungu in April 2011.
3. That the petitioner completed said course successful with distinguished position. (Copy of history/DMC sheet is attached as Annexure "B").
4. That after completion of courses and training from PTC Hungu the petitioner was deputed to undergo the necessary periods in different units of Police Department (Reader, OASI, Operation, Moharrar, Investigation etc) which the petitioner also accomplished satisfactorily. (Copy of satisfactory reports is annexed as Annexure "C").
5. That after completion of requisite courses/perior the petitioner was confirmed from 07-02-2011 and promoted in List-E w.e.f. 25-01-2014.
6. That the petitioner was posted in PS Ghazi on 06-03-2014 where he performed the duties sincerely, devotedly with honesty and to the entire

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satisfaction of senior officers.

7. That the petitioner was appreciated and due to his good performance, the petitioner was posted as Incharge Police Post Panyian, Police Station Havelian Abbott bad.
8. That the petitioner successfully completed probation period of 3-years in the rank of ASI and earned good/very good ACRs and promoted as Sub Inspector vide RPO Hazard Order Endt. No.14529-41/E dated 08-09-2015 is attached as Annexure "E".
9. That the petitioner was assigned the task of SHO PS Sherwan District Abbott bad on 17-02-2015 for almost 07 months and the petitioner performed efficiently, dedicatedly and remarkably.
10. That the petitioner also remained as SHO PS Sazeen District Kohistan for almost 6 months and earned good reputation.
11. That the petitioner was sent for Upper School Course to PTC Hungu on 0-03-2017 and completed the same on 30-06-2017 with distinguished position. (Copy of history/DMC sheet is attached as Annexure "D".
12. That after return from Upper School Course the petitioner performed different tasks in Police Line Haripur. In the meanwhile on 07-09-2017 the petitioner was deputed for Operation Command Course (Elite Centre Nowshera) which the petitioner completed successfully.
13. That the suitability report of DPO Haripur was sent to Worthy RPO Hazard Range Abbott bad for DPC of the conformation of SI with the recommendation as suitable for confirmation as SI. (Copy of suitability report is annexed as Annexure "E".
14. That during the said course, the DPC for confirmation of SIs Hazard region was held on 09-10-2017 by the worthy RPO Hazard Range Abbott bad whereby the petitioner was not confirmed to the rank of SI vide RPO Hazard Region Order Endst No.23242-63 dated 10-10-2017. (Copy of order is annexed as annexure "F".

Attested


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15. That SI Nadir Khan No.127/H District Abbottbad at S.No.60 of referred notification was confirmed as SI where as the petitioner was senior to him who was ignored illegally. Hence the instant representation against the illegal/unlawful, arbitrary order of worthy RPO Hazard Range Abbott bad.
16. That the petitioner performed his duties and possessed the pre-requisite for confirmation as SI. However the petitioner was deferred without any lawful justification and grounds.
17. That the petitioner has been granted commendation certificates and was given good ACRs and possess meritorious service record and was also recommended as suitable for conformation from DPO Haripur.
18. That the petitioner has never been awarded any minor/major punishment during the past service and petitioner highly educated trained police officer.
19. That the petitioner has been deprived from his legal right of confirmation in the Rank of Sub-Inspector on 09-10-2017. The said order is void, ab-initio, illegal and unlawful.

It is, therefore requested that the petitioner may kindly be confirmed in the rank of Sub-Inspector from the date of his due confirmation with all consequential relief and back benefits and the decision of DPC held on 09-10-2017 ignoring the petitioner from confirmation may kindly be set aside.

Petitioner

Faisal Hafeez No.159/H
District Haripur

25-10-2017

Accepted

[Signature]

ORDER


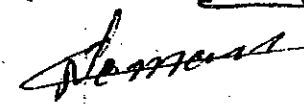
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Annex-H

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

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

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

Attested



26

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

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

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

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

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

(Necessary Gazette Notification may be issued accordingly)

Attested
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Annex-9

27

FOR PUBLICATION IN THE KHYBER
PAKHTUNKHWA POLICE GAZETTE PART-II,
ORDERS BY THE PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

No. 127 E-III, ADMISSION TO LIST "F": Dated: 11 / 01 / 2019

As per recommendations of the Departmental Promotion Committee dated 28.11.2018, the names of the following Sub-Inspectors are hereby brought on List-"F" with immediate effect:-

NO.	NAME & NO.	REGION	DATE OF CONF. AS SI	RECOMMENDATION
1.	Lady SI Saira Salch No. P/15	CCP, Peshawar	07.03.2009	The DPC examined his case and recommended him for inclusion of his name into List "F".
2.	SI Zafarullah No. B/21	Bannu	17.09.2009	The DPC examined his case and recommended him for inclusion of his name into List "F".
3.	SI Muhammad Iqbal No. H/211	Hazara	16.06.2010	The DPC examined his case and recommended him for inclusion of his name into List "F".
4.	SI Tariq Saleem No. D/28	D.I. Khan	22.06.2013	The DPC examined his case and recommended him for inclusion of his name into List "F".
5.	SI Waqar Ali No. H/184	Hazara	12.09.2014	The DPC examined his case and recommended him for inclusion of his name into List "F".
6.	SI Muhammad Saleem No. B/10	Bannu	03.02.2015	The DPC examined his case and recommended him for inclusion of his name into List "F".
7.	SI Ghulam Kazim No. D/8	D.I. Khan	01.06.2015	The DPC examined his case and recommended him for inclusion of his name into List "F".
8.	SI Yasin Kamal No. B/25	Bannu	11.11.2015	The DPC examined his case and recommended him for inclusion of his name into List "F".
9.	SI Abdul Aziz No. B/46	Bannu	11.11.2015	The DPC examined his case and recommended him for inclusion of his name into List "F".
10.	SI Faqir Muhammad No. P/100	CCP, Peshawar	01.03.2016.	The DPC examined his case and recommended him for inclusion of his name into List "F".
11.	SI Sajid Farooq No. H/213	Hazara	04.05.2016	The DPC examined his case and recommended him for inclusion of his name into List "F".
12.	SI Muhammad Tahir No. D/50	D.I. Khan	22.05.2016	The DPC examined his case and recommended him for inclusion of his name into List "F".
13.	SI Fahcem Mumtaz No. D/52	D.I. Khan	01.06.2016	The DPC examined his case and recommended him for inclusion of his name into List "F".
14.	SI Liaqat Ali No. D/45	D.I. Khan	19.07.2016	The DPC examined his case and recommended him for inclusion of his name into List "F".
15.	SI Anees ul Hassan No. D/55	D.I. Khan	05.12.2016	The DPC examined his case and recommended him for inclusion of his name into List "F".
16.	SI Saleem Ullah No. D/57	D.I. Khan	05.12.2016	The DPC examined his case and recommended him for inclusion of his name into List "F".

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DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 07.03.2009. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 17.09.2009. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 16.06.2010. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 22.06.2013. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 12.09.2014. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 03.02.2015. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 01.06.2015. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 11.11.2015. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 11.11.2015. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 01.03.2016. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 04.05.2016. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 22.05.2016. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 01.06.2016. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 19.07.2016. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 05.12.2016. The DPC examined his case and recommended him for inclusion of his name into List "F". According to Rule 13-18 of Police Rule 1934, he will be promoted to the rank of Offg. Inspector (BPS-15) with effect from 05.12.2016.

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NAN

SI Naik Zaman No. 207
SI Alam Taj No. MR/208
SI Zahir Shai No. 209
SI Abdullah 210
SI A 211

NO.	NAME & NO.	REGION	DATE OF CONF: AS SI	RECOMMENDATION
185	SI Waris Khan No. H/202	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
186	SI Khan Waiz No. H/203	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
187	SI Habib ur Rehman No. H/204	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
188	SI Pervez No. H/205	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
189	SI Niaz Muhammad No. H/206	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
190	SI Naeem Akhtar No. H/207	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
191	SI Muhammad Siraj No. H/208	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
192	SI Abdul Sattar No. H/209	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
193	SI Waris Khan No. H/210	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
194	SI Sher Dil No. H/211	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
195	SI Abdul Maroof No. H/212	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
196	SI Abdul Hameed No. H/215	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
197	SI Muhammad Rafique No. H/216	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
198	SI Wajid Ali No. H/217	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
199	SI Abdul Jalil No. H/218	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
200	SI Amjad Ali No. H/219	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
201	SI Muhammad Nawaz No. H/220	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
202	SI Nadir Khan No. H/221	Hazara	10.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
203	SI Afsar Said No. MR/49	Mardan	24.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
204	SI Manzoor Alam No. MR/26	Mardan	24.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
205	SI Muhammad Usman No. MR/38	Mardan	24.10.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".

Accepted
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K

S.NO.	NAME & NO.	REGION	DATE OF CONF. AS ST	RECOMMENDATION
437	SI Rizwan Ullah No. K/179	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
438	SI Muhammad Jamal No. K/180	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
439	SI Zardad Khan No. K/184	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
440	SI Bahadar Nawaz No. K/186	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
441	SI Islam-Ud-Din No. K/189	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
442	SI Fazal Badshah No. K/194	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
443	SI Ahmed Janan No. K/195	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
444	SI Faizullah No. K/137	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
445	SI Ahmed Hussain No. K/185	Kohat	30.06.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".
446	SI Zafrullah No. B/22	Bannu	11.11.2015	The DPC examined his case and recommended his name to be removed from List "F" in the light of recommendation of RPO Bannu Region vide his office Memo: No. 1479/EC, dated 24.05.2018.

Telecommunications Cases

1.	SI Rustam Khan	Tele:	31.05.2015	The DPC examined his case and recommended him for inclusion of his name into List "F".
2.	SI Zahir	Tele:	30.07.2017	The DPC examined his case and recommended him for inclusion of his name into List "F".
3.	SI Inayatullah	Tele:	31.03.2018	The DPC examined his case and recommended him for inclusion of his name into List "F".

Sd/-
SALAH-UD-DIN KHAN
Inspector General of Police
Khyber Pakhtunkhwa

No. 128-42 /E-III. Dated Peshawar, the 11 / 01 /2019.

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

1. Addl: IGP/HQrs: Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police HQrs: Khyber Pakhtunkhwa Peshawar.
3. Capital City Police Officer Peshawar.
4. Regional Police Officers, Mardan, Malakand, Hazara, Kohat, Bannu & DIKhan.
5. Deputy Inspector General of Police Tele-Communications Khyber Pakhtunkhwa Peshawar.
6. Registrar CPO, Peshawar.
7. Office Supdt: Secret Branch CPO, Peshawar.
8. Office Supdt: E-II and CPB Branch CPO, Peshawar.
9. Incharge SRC/CPO, Peshawar.
10. U.O.P files.

All DPOs in HQ Zone
ECC
For info

779
16.01.19

NO. 1975-81/EC
dt. 23-07-2019

(SADIQ BALOCH)PSP
AIG/Establishment
For Inspector General of Police
Khyber Pakhtunkhwa, Peshawar

531
25/1/2019

MSM
187
USRC

scab
DPO-14
9-1-19

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Annex J

To: The Worthy Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

THROUGH PROPER CHANNEL

Subject: REPRESENTATION AGAINST THE DECISION OF DEPARTMENTAL PROMOTION COMMITTEE HELD BY WORTHY RPO HAZARA REGION ON 09.10.2017 VIDE ORDER NO. 23242-63/E DATED 10.10.2017 WHEREBY THE PETITIONER WAS NOT CONFIRMED AS SUB-INSPECTOR ILLEGALLY AGAINST THE FACTS AND JUNIOR OFFICERS WERE CONFIRMED AND BROUGHT ON F-LIST WHEREAS THE PETIONER WAS DEFERED WITHOUT LAWFUL GROUNDS AND JUSTIFICATION


Prayer:- *On acceptance of this representation, the decision of DPC dated 09.10.2017 regarding the confirmation of Sub-Inspector may kindly be set aside and the portioner may kindly be confirmed in the rank of Sub-Inspector and brought on F-list as per seniority of petitioner with all back benefits and consequential reliefs.*

Respected Sir,

The petitioner/appellant submits as under:-

1. That the petitioner was selected through KPK PSC as Probationer ASI on 07.02.2011 in KPK Pakistan.(Copy of worthy RPO Hazara Range Order No. 1652-58/E dated 07.02.2011 is attached as Annexure "A")
2. That the petitioner was sent to PTC Hangu to undergo the P/ASI Course in April 2011 where the petitioner completed said course successfully and with distinguished position.(Copy of DMC is attached as Annexure "B")
3. That after completion of course and training from PTC Hangu the petitioner was deputed to undergo the necessary period in different units of Police Department (Reader, OASI, Operation, Moharrar, Investigation etc) which the petitioner also accomplished satisfactorily.(Copy of satisfactory reports is annexed as Annexure "C")
4. That after completion of requisite courses/period, the petitioner was confirmed from 07.02.2011 and brought on List-E w.e.f 25.03.2014.(Copy of

Accepted



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worthy RPO Hazara Range Order No. 4566-67/E dated 25.03.2014 is attached as Annexure "D")

5. That the petitioner was posted in PS Ghazi on 06.03.2014 where he performed his duties, sincerely, devotedly, honesty and up to the entire satisfaction of senior officers. Therefore petitioner was appreciated and due to his good performance, the petitioner was posted as Incharge Police Post Paniyan, Police station Kotnajibullah, Haripur and Police Post Rajoyia, Police station Haveliyan Abbottabad.
6. That the petitioner successfully completed probation period of 3-years in the Rank of ASI and earned good/very good ACRs and was promoted as Sub-Inspector.(Copy of vide RPO Hazara Order Endst No. 14529-41/E dated 08.09.2015 is attached as Annexure "E")
7. That the petitioner was assigned the task of SHO Police station Sherwan District Abbottabad on 17.09.2015 for almost 07 months and as SHO Police station Sazeen District Kohistan for almost 06 months where the petitioner performed efficiently, dedicatedly and remarkably and earned good reputation.
8. That the petitioner was sent for Upper School Course at PTC Hangu on 01.03.2017 and completed the same on 30.06.2017 with distinguished position.(Copy of DMC is attached as Annexure "F")
9. That after return from Upper School Course, the petitioner performed different tasks in police lines and as SHO Police station Kotnajibullah Haripur. In the mean while the petitioner was deputed for operational command course (Elite Centre Nowshera) which the petitioner completed successfully.
10. That the suitability report of petitioner by DPO Haripur was sent to worthy RPO Hazara Range Abbottabad for DPC for the confirmation, with the recommendation as "Suitable" for confirmation as SI.(copy of suitability report is annexed as annexure "G")
11. That during the said course, the DPC for the confirmation of SI's in Hazara range was held on 09.10.2017 by the worthy RPO Hazara Range Abbottabad whereby the petitioner was not confirmed in the rank of SI vide RPO Hazara Range order Endst: No. 23242-63/E dated 10.10.2017.(Copy of order is annexed as annexure "H")

Asad



12. That SI Nadir Khan No. 127/H District Abbottabad at S.No 60 of referred notification was confirmed as SI whereas the petitioner was senior to him who was ignored illegally, Hence the instant representation against the illegal/unlawful, arbitrary order of worthy RPO Hazara Range Abbottabad.
13. That the petitioner performed his duties and possessed the pre-requisite for confirmation as SI. However, the petitioner was deferred without any lawful justification and grounds.
14. That the appellant filed departmental appeal through proper channel against the said illegal DPC but no order was communicated to the petitioner and same is pending in the office of worthy RPO Hazara Range Abbottabad.(copy of Appeal vide diary No. 7020/SRC-HR dated 20.11.2017 attached as annexure "I")
15. Similarly the petitioner again submitted another application/appeal to worthy RPO Hazara Range vide diary No. 7455/SRC-HR dated 11.12.2017, but with no result was communicated to the petitioner till to date.
16. That after the petitioner remained as ASHO and SHO Police Station KTS District Haripur, and the petitioner performed efficiently, dedicatedly and remarkably and earned good reputation.
17. That the petitioner was confirmed as SI in next DPC held on 24.05.2018 by the worthy RPO Hazara Range vide order Endst: No.15109-120/E dated 24.05.2018.(Copy of order is annexed as annexure "J")
18. The petitioner was transferred and posted to PTC Hangu on deputation vide order No.15775-79/E-III dated 31.08.2018 and still performing his duties as Law Instructor at PTC Hangu.
19. The petitioner was not brought on F-list whereas SI Nadir Khan No. H/221 was brought on F-list on 11.01.2019 by the order of worthy IGP KPK Peshawar.(Copy of order is annexed as annexure "K")
20. SI Nadir Khan who was on the S.No 202 of F-list order also junior to the petitioner was confirmed and brought on F-list, hence valuable rights of the petitioner have been infringed.

Altaf
E. F. O.

21. That the petitioner has never been awarded any minor/major punishment during the past service and petitioner is highly educated, trained, professional police officer.

22. That the petitioner has been granted many commendatory certificates and was given good/very good ACRs in whole service also possesses meritorious service record and was also recommended as suitable for confirmation form DPO Haripur. (Before the DPC held on 09.10.2017 ignoring the petitioner from confirmation).

23. That the petitioner has been deprived from his legal right of confirmation in the rank of Sub Inspector held on 09.10.2017. The said order is void ab-initio, illegal and unlawful.

It is therefore requested that the petitioner may kindly be confirmed in the rank of Sub Inspector from the date of his due confirmation with all consequential relief and back benefits and the decision of DPC held on 19.10.2017 ignoring the petitioner from confirmation, May kindly be set aside and brought on F-list as per seniority of petitioner with all back benefits and consequential reliefs, as the petitioner fulfilled all the requirements for confirmation.

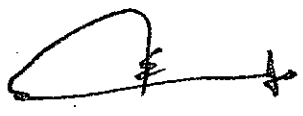
Dated 10.02.2019



Petitioner

**Sub inspector
Faisal Hafeez belt No. H\27
Law Instructor PTC Hangu.**

Alshad



33

Annex-K

PH: 0925-620486
FAX: 0925-620486


Office Of The Commandant Police Training College Hangu.



The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

AGC Dated Hangu Dte. 07/03/2019.

APPLICATION.

Enclosed kindly find herewith the self explanatory representation along with relevant documents preferred by Sub-Inspector Faisal Hafeez No. 1377 of Hazara Region presently serving in this institution as Law Instructor, about confirmation in the rank of SI from the date of his due confirmation in the DPC held on 19-10-2017 in his parent Region Hazara for consideration, please.


Commandant
Police Training College, Hangu.

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Annex - L

REVISED SENIORITY LIST OF INSPECTORS & SUB INSPECTORS ON LIST OF KHYBER PAKHTUNKHWA POLICE AS AT STAGE ON 10/07/2015

S/N	NAME AND NO.	HONK DISTRICT	EDU.	D.O. BIRTH	D.O. JOINING SERVICE	D.O. CONF. AS SI	D.O. ADVANCE TO LIST	PROMOTION AS OFFICER INSPECTOR	DRAWN AS INSPE.	REMARKS
1	Muhammad Iqbal No. 1079	Kohat	BA	12.12.1960	26.07.1980	30.05.2008	30.07.2010	30.07.2010		Continued in the rank of Insp (Senior) Kohat under No. 1079/1979. (d) 2009-2013
2	Shah Ali No. 10210	Dir Lower	BA	21.02.1968	06.10.1977	16.04.2007	15.05.2015	22.08.2015	25.03.2017	Continued in the rank of Insp (Senior) Kohat under No. 10210/1977. (d) 2009-2013
3	Muhammad Raza No. 1017	Kohat	DDU	17.08.1973	08.09.1991	02.12.2011	30.01.2013	30.07.2013	30.01.2015	Granted seniority of Insp in order granted by ACP, District CM, Kohat, dated 12.10.2011 & revised accordingly by ACP, District CM, Kohat, dated 13.01.2012
4	Rajab Ali No. 10217	Kohat	FA	09.07.1963	01.07.1984	14.03.2012	30.01.2013	30.01.2013	30.01.2015	Continued in the rank of Insp (Senior) Kohat under No. 10217/1977. (d) 2009-2013
5	Ali Ishaq No. 10224	Dir Lower	BA	27.02.1966	24.08.1988	14.03.2012	30.01.2013	30.01.2013	19.10.2015	Continued in the rank of Insp (Senior) Kohat under No. 10224/1977. (d) 2009-2013
6	Muhammad Iqbal No. 10160	Dir Lower	BA	03.04.1961	16.01.2002	27.05.2008	30.01.2013	30.01.2013	19.10.2015	Continued in the rank of Insp (Senior) Kohat under No. 10160/1977. (d) 2009-2013
7	Abdul-Rahman No. 10281	Dir Lower	FA	07.11.1961	18.07.2004	20.10.2008	30.01.2013	30.01.2013	30.01.2015	Continued in the rank of Insp (Senior) Kohat under No. 10281/1977. (d) 2009-2013
8	Ali Hassan No. 10222	Kohat Agency	SN	08.05.1965	12.10.1986	13.08.2012	30.01.2013	30.01.2013	30.01.2015	Continued in the rank of Insp (Senior) Kohat under No. 10222/1977. (d) 2009-2013
9	Muhammad Iqbal No. 10210	Dir Lower	BA	02.02.1964	02.05.1982	11.08.2012	30.01.2013	30.01.2013	19.10.2015	Continued in the rank of Insp (Senior) Kohat under No. 10210/1977. (d) 2009-2013
10	Muhammad Iqbal No. 1007	Dir Lower	BA	30.04.1957	18.01.2001	31.08.2013	30.01.2013	30.01.2013	30.01.2015	Continued in the rank of Insp (Senior) Kohat under No. 1007/1977. (d) 2009-2013

SP/100
S/O Services
g. D.K.P. 10/10/15

Amulya
Assistant E-11

OS/E-11


10/07/2015

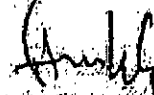


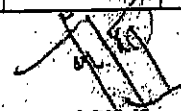
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[Signature]

149.	SI Muhammad Rafique No. H/718	Abbottabad	10 ^A	12.05.1962	20.02.1995	10.10.2017	11.01.2019			
147.	SI Waheed Ali No. H/217	Manshera	FA	01.06.1965	26.12.1987	10.10.2017	11.01.2019			
148.	SI Abdul Jaleel No. H/214	Manshera	10 ^B	07.05.1966	24.09.1986	10.10.2017	11.01.2019			
149.	SI Amjad Ali No. H/219	Abbottabad	10 ^A	14.02.1971	03.04.1990	10.10.2017	11.01.2019			
150.	SI Muhammad Nawaz No. H/220	Manshera	BA	15.07.1963	03.10.1985	10.10.2017	11.01.2019			
151.	SI Nadeem Khan No. H/221	Abbottabad	BA	03.04.1965	08.09.2013	10.10.2017	11.01.2019			
152.	SI Muhammad Usman No. MR/04	Mardan	10 ^B	03.09.1960	21.02.1979	24.10.2017	11.01.2019			
153.	SI Nadeem Zaman No. MR/62	Nowshera	FA	12.05.1970	23.10.1988	24.10.2017	11.01.2019			
154.	SI Zahid Shah No. MR/131	River	10 ^A	01.04.1962	17.06.1986	24.10.2017	11.01.2019			
155.	SI Abdullah No. MR/118	Mardan	FA	15.12.1967	01.12.1991	24.10.2017	11.01.2019			
156.	SI Abdul Ameen No. MR/107	Mardan	BA	04.02.1970	01.12.1991	24.10.2017	11.01.2019			
157.	SI Abdul Hakeem No. MR/257	Charsadda	FA	01.02.1970	25.04.1991	24.10.2017	11.01.2019			
158.	SI Mansoor Ahmed No. MR/119	Charsadda	FA	20.01.1971	04.08.1991	24.10.2017	11.01.2019			
159.	SI Ajmal Hayer No. MR/324	Swabi	FA	06.10.1963	26.09.1988	24.10.2017	11.01.2019			
160.	SI Noor ul Wahab No. MR/94	Mardan	10 ^B	13.07.1965	19.10.1983	24.10.2017	11.01.2019			
161.	SI Nadeem Khan No. MR/238	Mardan	10 ^B	15.05.1967	09.08.1986	24.10.2017	11.01.2019			
162.	SI Sabzar Ali No. MR/135	Mardan	FA	11.08.1965	21.12.1985	24.10.2017	11.01.2019			
163.	SI Nadeem Ullah No. MR/243	Swabi	FA	01.11.1965	25.03.1986	24.10.2017	11.01.2019			
164.	SI Noor ul Ali Shah No. MR/257	Mardan	10 ^B	28.03.1968	22.12.1986	24.10.2017	11.01.2019			
165.	SI Muhammad Iqbal No. MR/247	Mardan	10 ^B	15.04.1962	18.02.1985	24.10.2017	11.01.2019			
166.	SI Anwar Khan No. MR/154	Mardan	FA	28.04.1966	26.09.1986	24.10.2017	11.01.2019			
167.	SI Muhammad Javed No. MR/244	Mardan	BA	14.10.1967	31.12.1987	24.10.2017	11.01.2019			

35

Attested

 Attestor


 Assistant E-II


 OS/D-II



 Registrar

IPK	SI Dili Panti No. 1/26	Hezara	10	20.01.1971	20.01.1971	23.01.2018	14.02.2020
1002	SI Ahmad Khatun No. 1/26	Hezara	10	25.04.1967	20.01.1971	24.01.2018	14.02.2020
1003	SI Panti Hades No. 1/26	Hezara	B.Com	01.01.1957	07.02.2011	24.05.2018	14.02.2020
1004	SI Nema Jaber No. 1/26	Hezara	B.Sc	16.01.1957	07.08.2011	21.05.2018	14.02.2020
1005	SI Sada Dahi No. 1/26	Hezara	BA	18.01.1962	07.02.2011	20.05.2018	14.02.2020
1006	SI Aamir Bishara No. 1/26	Hezara	B.Sc	01.07.1963	07.02.2011	24.05.2018	14.02.2020
1007	SI Khatun Khatun No. 1/26	Hezara	F.Sc	01.02.1945	07.02.2011	24.05.2018	14.02.2020
1008	SI Husein No. 1/26	Hezara	B.Sc	11.01.1946	07.02.2011	24.05.2018	14.02.2020
1009	SI Sada No. 1/26	Hezara	BA	13.01.1950	07.02.2011	24.05.2018	14.02.2020
1010	SI Sada No. 1/26	Hezara	B.A	21.01.1958	07.02.2011	24.05.2018	14.02.2020
1011	SI Sada No. 1/26	Hezara	B.A	02.02.1951	07.02.2011	24.05.2018	14.02.2020
1012	SI Sada No. 1/26	Hezara	M.Sc	01.03.1963	07.02.2011	24.05.2018	14.02.2020
1013	SI Sada No. 1/26	Hezara	BA	11.01.1964	07.02.2011	24.05.2018	14.02.2020
1014	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1015	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1016	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1017	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1018	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1019	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1020	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1021	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1022	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1023	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1024	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1025	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1026	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1027	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1028	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1029	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1030	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1031	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1032	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1033	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1034	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1035	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1036	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1037	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1038	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1039	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1040	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1041	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1042	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1043	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1044	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1045	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1046	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1047	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1048	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1049	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020
1050	SI Sada No. 1/26	Hezara	BA	01.01.1963	07.02.2011	24.05.2018	14.02.2020

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Admitted

 Admitted

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Amir M

BEFORE PROVINCIAL POLICE OFFICER K.P.K
PESHAWAR

(Through proper channel)

REVIEW PETITION/DEPARTMENTAL APPEAL AGAINST REVISED SENIORITY LIST "F" OF INSPECTORS AND SUB INSPECTORS POLICE KPK PESHAWAR ISSUED ON 24-07-2020 WHEREBY APPELLANT'S NAME IS PLACED AT S/NO. 1098 INSTEAD OF 851.

PRAYER: ON ACCEPTANCE OF INSTANT REVIEW PETITION REVISED LIST "F" DATED 24-07-2020 MAY KINDLY BE MODIFIED TO THE EXTENT OF APPELLANT AND HIS NAME MAY BE BROUGHT AT S/NO. 851 INSTEAD OF 1098 ABOVE THE NAME OF SUB. INSPECTOR NADIR KHAN H/221 WITH THROUGHOUT SENIORITY, CONFIRMATION AND PROMOTION AT RIGHT PLACE SINCE CONFIRMATION ORDER 10-10-2017 OF SUB INSPECTORS WAS ISSUED.


With most reverence and humble submission the following few lines are laid down before your highness for kind consideration and necessary orders please:

1. That appellant along with others on provincial level against 25% quota reserved for direct appointment was inducted in the police department as Probationer Assistant Sub Inspector through Public Service Commission vide Regional Police Officer, Hazara Region, Abbottabad order dated 07-02-2011.

(Copy of order dated 07-02-2011
is attached as "A").

2. That on successful and satisfactory completion of 03 years probationary period the appellant was confirmed in the rank of Assistant Sub Inspector with effect from 07-02-2011 by the Regional Police Officer, Hazara Region, Abbottabad vide order dated 25-03-2014. Appellant's name stands at S/No.1 above the name of Nadir Khan ASI H/127.

(Copy of order dated 25-03-2014
is attached as "B").

K. P. K.


3. That appellant was promoted as Officiating Sub Inspector vide order dated 08-09-2015 and his name was placed at S/No. 15, above the name of Nadir Khan ASI H/127.

(Copy of order dated 08-09-2015 is attached as "C").

4. That thereafter the appellant along with other colleagues was brought on the Seniority List "E" of Officiating Sub Inspectors and Assistant Sub Inspectors of Hazara Region Abbottabad issued vide order dated 08-12-2015. The name of appellant is shown at S/No. 207 of the list, above the name of SI Nadir Khan H/127.


(Copy of seniority list "E" of Offg. Sub Inspectors and Assst. Sub Inspectors dated 08-12-2015 of Hazara Region is attached as "D").

5. That before confirmation of Sub Inspectors, their suitability report was sought by the Regional Police Officer, Hazara Region, Abbottabad from their respective DPOs. The appellant was declared suitable by his DPO concerned and furnished his recommendations.

(Copy of Suitability report is attached herewith as "E").

6. That while the Regional Police Officer, Hazara Region, Abbottabad confirming his colleagues in the Rank of Sub Inspectors, appellant's junior SI Nadir Khan H/127 was confirmed and allotted a new number as H/122 and his name is placed at S/No. 60 of the order dated 10-10-2017 ignoring the appellant without any reason and justification despite the fact that he fulfilled all requisite qualifications including suitability report. There was nothing adverse on record against the appellant thus he was eligible to be confirmed in the rank of Sub Inspector.

(Copy of order dated 10-10-2017 is attached herewith as "F").

Attested


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7. That aforementioned order of the Regional Police Officer, Hazara Region, Abbottabad was appealed against by appellant through departmental appeal dated 25-10-2017 before the PPO/IGP KPK Peshawar and the same was forwarded by the District Police Officer Haripur vide covering letter dated 20-11-2017. But this appeal was not responded by the Regional Police officer.

(Copies of appeal dated 25-10-2017 And covering letter dated 20-11-2017 are Attached as "G & H").

8. That later on, the appellant submitted a reminder appeal to the PPO/IGP KPK Peshawar vide covering letter dated 11-12-2017 of the DPO Haripur but the same was also not responded.

(Copy of covering letter dated 11-12-2017 is attached as "I").

9. That appellant was ultimately confirmed as Sub Inspector by the Regional Police Officer, Hazara Region, Abbottabad vide order dated 24-05-2018 as his name is placed at S/No. 18 of this order.

(Copy of order dated 24-05-2018 is attached as "J").

10. That in the Notification dated 11-01-2019 regarding admission to list "F" of KPK Sub Inspectors for publication, the name of appellant's junior SI Nadir Khan H/221 has been mentioned at S/No. 202 while ignoring the appellant without any reason and justification.

(Copy of Notification dated 11-01-2019 is attached herewith as "K").

11. That appellant challenged the above mentioned Notification through representation dated 10-02-2019 which was forwarded to the Inspector General of Police KPK Peshawar vide covering letter dated 07-03-2019 of the Commandant, Police Training College Hangu.

(Copies of representation dated 10-02-2019 And letter dated 07-03-2019 are attached Herewith as "L & M").

M. S. A. [Signature]

- 41
12. That appellant also made a written request along with an application both dated 24-12-2019 seeking permission for his personal appearance before the worthy Inspector General of Police KPK Peshawar in this respect which request was forwarded by Commandant Police Training College Hangu to PPO/IGP KPK Peshawar through covering letter dated 14-01-2020.

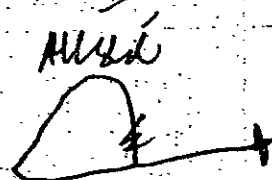
(Copies of request, application and covering letter dated 24-01-2020 are attached herewith as "N, O & P").

13. That now in Admission Notification of KPK Inspectors and Sub Inspectors to list "F" dated 14-02-2020, the name of appellant has been shown at S/No. 22, while his name is placed at S/No. 1098 instead of 851 of revised seniority list "F" of KPK Inspectors and issued on 24-07-2020. While appellant's junior SI Nadir Khan 221/H is placed above him at S/No. 851 of the list. The appellant has been made far junior to his juniors causing colossal damage in service career without any reason and justification.

(Copy of seniority list "F" of Inspectors and Sub Inspectors of KPK dated 24-07-2020 is attached herewith as "Q").

14. That aforementioned seniority list "F" dated 24-07-2020 was neither circulated to the appellant nor was its copy provided to him despite repeated requests and he had to collect the same through his personal enthusiastic efforts. Since 2017 the appellant is running from pillar to post for his legitimate right of confirmation, seniority and promotion. He had to submit repeated departmental appeals but all in vain. Neither his genuine appeals, representations and requests were ever responded nor was his case settled despite the fact that he has unblemished rather meritorious service record and there is nothing adverse against him and he also fulfills all requisite conditions in respect of his grievance.

15. That appellant case is that of hardships when his requests, appeals and representations are not responded to which departmental authorities are

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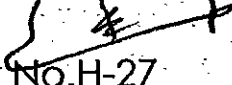
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legally bounded under the law, departmental rules and regulation and principle of natural justice.

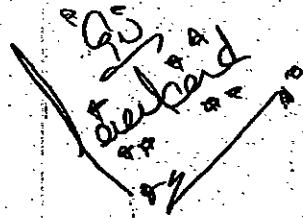
- 16. That after obtaining the copy of seniority list "F" dated 24-07-2020 on personal efforts this representation/review petition is being made by appellant seeking his due confirmation in the rank of Sub Inspector, seniority and subsequent promotion at right place amongst his colleagues.

In view of the aforementioned facts it is earnestly requested that on acceptance of instant review petition the seniority list "F" dated 24-07-2020 may kindly be modified to the extent of appellant bring his position at S/No. 851 instead of 1098 above the name of his junior SI Nadir Khan H/221 and also modifying all orders of confirmation, seniority and promotion onward since confirmation order of Sub Inspectors dated 10-10-2017 with grant of all consequential service back benefits. Thanks.

Your obedient servant

Faisal Hafeez 
 Sub Inspector No.H-27
 Presently posted
 SI/PO Motor Way Sector E-35
 Beat-1, Haripur
 Cell No.0315-5047667

Dated: 20-10-2020



43

Amir N



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

No. CPO/CPB/ 354

Dated Peshawar 02 December 2020

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

Subject: APPEAL

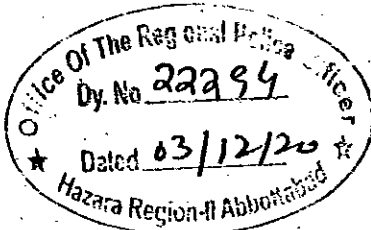
Memo:-

Please refer to your office Memo: No. 29543-44/E, dated 12.11.2020 on the subject noted above.

The appeal of Sub Inspector Faisal Hafeez No. H/27 was processed and sent to AIG/Legal CPO for legal opinion and filed by the Competent Authority. The opinion of AIG/Legal is reproduced as under: -

"The similar nature of application has already been filed by the Competent Authority, this application has nothing any advance or additional supporting material, therefore not entertainable"

The applicant may be informed accordingly.



NO. 32034/E
dt- 7-12-020

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

EC/DPO Maxipur
In reply informed the applicant accordingly.

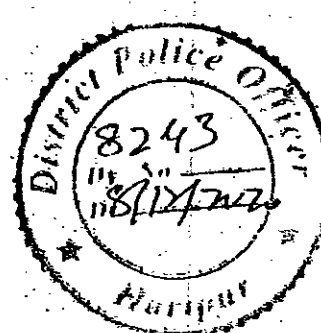
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(Signature)

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PK
PPS
3
Priz, P. Suloman
M. Suloman

SKC



Attested
(Signature)

گذشتہ دنوں کے درج ذیل آفیسرز کو نوڈل آفیسر کے طور پر

عزیزان - فراہمی حکم برائے اسل -

صوبہ عالی

1. سید محمد سعید - سب ڈیویژن کے ایڈیشنل
2. سید سجاد علی شاہ - سب ڈیویژن کے ایڈیشنل
3. سید یونس احمد - سب ڈیویژن کے ایڈیشنل
4. سید محمد علی - سب ڈیویژن کے ایڈیشنل
5. سید محمد علی - سب ڈیویژن کے ایڈیشنل
6. سید محمد علی - سب ڈیویژن کے ایڈیشنل
7. سید محمد علی - سب ڈیویژن کے ایڈیشنل
8. سید محمد علی - سب ڈیویژن کے ایڈیشنل
9. سید محمد علی - سب ڈیویژن کے ایڈیشنل
10. سید محمد علی - سب ڈیویژن کے ایڈیشنل

15/01/2021 (34)

SRC/PA

For n/a.

m.

فہرست آفیسرز کے ناموں کے ساتھ

H-27

Addl. SP.Hr.

15.01.2021

Add: S.P. Habor

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I received a copy of order
No. CPO/CPB/354 dated 02/12/2020
today on 15/01/2021 from SRC
branch of DPO office Habor

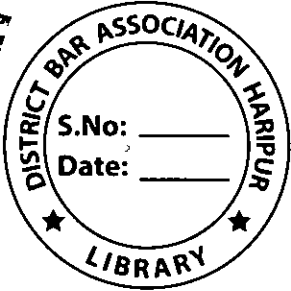
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DBA No: 198
 BC No:
 Name of Advocate: محمد اسلم تنولی

S.No: 90135



وکالت نامہ



بجاءت: محمد اسلم تنولی
 عنوان: فصل صورت
 منجانب: سرمد اسلم
 نوعیت مقدمہ: سرمد اسلم
 باعث تحریر آئیکہ: سرمد اسلم

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی با تصنیف مقدمہ بمقام ایس ڈی اے کے لیے
محمد اسلم تنولی

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

Accepted
 M. Aslam

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔

مورخہ: 2021/01/21 دن 21/01/2021 سال
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

(Signature)

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

713

No.

Appeal No. 1416 of 20 21

Faisal Hafeez

Appellant/Petitioner

P.P.O. 14111 Pesh.

Versus

Respondent

Respondent No. 2

Notice to:

Regional Public Officer Hazara Region
Ale Akhbar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal ^{on} ~~on~~ at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this Jan 22 Day of.....20

at Camp Court P. Akbar

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. FB

No.

1416

21

Appeal No. of 20 ..

Faisal Hafeez Appellant/Petitioner

P.P.O. up to Pesh. Respondent

Provincial Police Dept. Govt. of Pk
Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....
Jan 22 7th
Day of.....20 ..

at Camp Court A. Abdul

[Signature]

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

TR A/Abad.

No.

APPEAL No. 1416 of 20 21

Faisal Hafeez

Appellant/Petitioner

Versus

PPO Peshawar

[Signature]
19/9/22

RESPONDENT(S)

Notice to ~~Appellant/Petitioner~~

RESP NO I

Provincial Police Officer
KPK Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 22-9-22 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Atmt Court
A/Abad

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.