

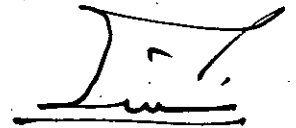
06.10.2022

Appellant alongwith his counsel present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Representative of respondents submitted copies of minutes of DPC dated 05.07.2013 regarding promotion of Junior Clerks as Officiating Senior Clerks, however copy of minutes of DPC dated 02.07.2015 regarding promotion of Junior Clerks to the post of Senior Clerks has not been produced, therefore, representative of the respondents is directed to positively produce the same on the next date. Representative of the respondents also produced copies of ACRs of the appellant consisting of 15 sheets, which are placed on file. To come up for production of minutes of DPC dated 02.07.2015 as well as arguments on 10.11.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)
Member (J)
Camp Court Swat



(Salah-Ud-Din)
Member (J)
Camp Court Swat

SCANNED
KPST
Peshawar

2-8-22

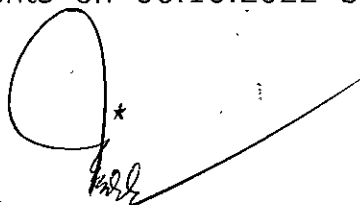
Due to summer vacation the case is adjourned to 7-9-22 for the same.



07.09.2022

Appellant alongwith his counsel present. Mr. Ali Rehman, Inspector (legal) alongwith Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present.

After hearing arguments of learned counsel for the appellant at certain length, it transpired that minutes of DPC dated 05.07.2013 regarding promotion of Junior Clerks to the post of officiating Senior Clerks as well as minutes of DPC dated 02.07.2015 regarding promotion of Junior Clerks to the post of Senior Clerks have not been submitted either by the appellant or by the respondents. The availability and perusal of the aforementioned minutes are necessary for just and right decision of the appeal, therefore, representative of the respondents is directed to produce the same on the next date and to come up for arguments on 06.10.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)
Member (Executive)
Camp Court Swat

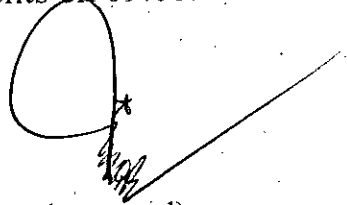


(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

13.05.2022

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Ali Rehman, SI for respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 09.06.2022 before the D.B at camp court Swat. .



(Mian Muhammad)
Member(E)

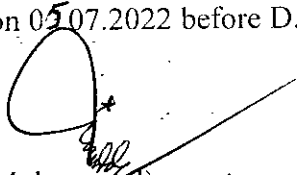


(Salah Ud Din)
Member(J)
Camp Court Swat

09.06.2022

Appellant in person present. Mr. Kabirullah Khattak, learned Additional Advocate General for the respondents present.

Counsel are on strike. Adjourned. To come up for arguments on 05.07.2022 before D.B at camp court Swat.



(Mian Muhammad)
Member (E)
Camp Court Swat



(Kalim Arshad Khan)
Chairman
Camp Court Swat

04.07.2022

Counsel for appellant present.

Noor Zaman Khattak, learned District Attorney for respondents present.

Former made a request for adjournment as he has not made preparation of the brief of case; granted. To come up for arguments on 02.08.2022 before D.B at Camp Court, Swat.



(Fareeha Paul)
Member (E)
Camp Court, Swat



(Rozina Rehman)
Member (J)
Camp Court, Swat


11.02.2022 Tour is hereby canceled .Therefore, the case is adjourned to 08.04.2022 for the same as before at Camp Court Swat.

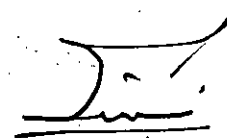

Reader

08.04.2022 Clerk of learned counsel for the appellant present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Riaz Ahmed Painsakhel, Assistant Advocate General for the respondents present.

Representative of the respondents namely Ali Rehman, Inspector (Legal) produced copy of Notification dated 27.01.2022 whereby the appellant has been promoted to the post of Senior Clerk with immediate effect.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is unable to appear before the Tribunal today being engaged in other courts. Adjourned. To come up for arguments on 05.05.2022 before the D.B at Camp Court Swat.


(Rozina Rehman)
Member (J)
Camp Court Swat

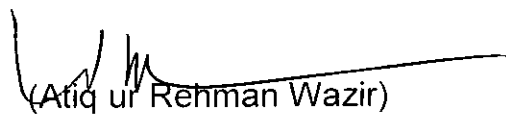

(Salah-ud-Din)
Member (J)
Camp Court Swat

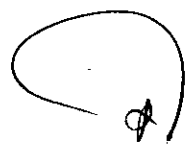
08.12.2021

Appellant alongwith counsel present.

Muhammad Rasheed learned Deputy District Attorney alongwith Ali Rehman S.I (Legal) for respondents present.

Arguments were heard at some length. In view of arguments of both the parties and keeping in view letter No.301 dated 8th October, 2019 addressed to the District Police Officer, Swat in respect of the Departmental Promotion Committee meeting regarding the promotion of Junior Clerks to the rank of Senior Clerks, this case is adjourned to 06.01.2022 with direction to the respondents to submit progress report on or before the date fixed, before D.B at Camp Court, Swat.

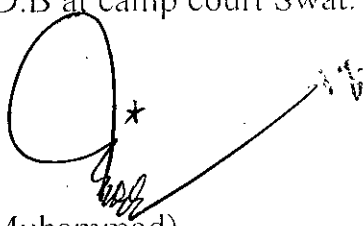

(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Swat.

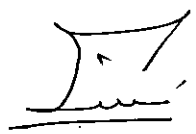

(Rozina Rehman)
Member (J)
Camp Court, Swat

06.01.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Ali Rehman SI (Legal) for respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today due to general strike of the Bar. Adjourned. To come up for arguments on 11.02.2022 before D.B at camp court Swat.


(Mian Muhammad)
Member(E)

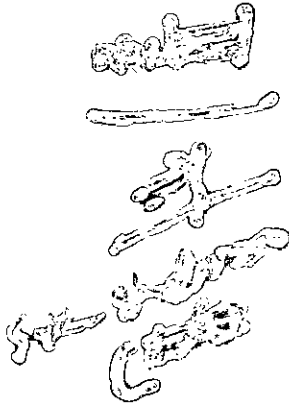

(Salah Ud Din)
Member(J)
Camp Court Swat

05.10.2021

Nemo for parties.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General present.

Preceding date was adjourned on a Reader's note, therefore, both the parties be put on notice for 08.12.2021 before D.B at Camp Court, Swat.




(Atiq ur Rehman Wazir)
Member(E)
Camp Court, Swat

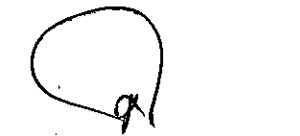


(Rozina Rehman)
Member(J)
Camp Court, Swat

Post Script
05.10.2021

Later on, learned counsel for appellant appeared and submitted additional documents through an application, with a request for adjournment. Adjourned. To come up for arguments on 08.12.2021 before D.B at Camp Court, Swat.


(Atiq ur Rehman Wazir)
Member(E)
Camp Court, Swat


(Rozina Rehman)
Member(J)
Camp Court, Swat

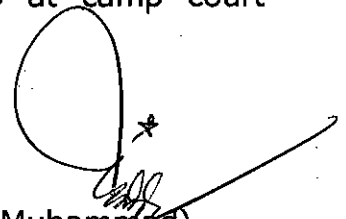
02.02.2021

Counsel for the appellant present.

Muhammad Riaz Khan Painsdakhel, Assistant Advocate General alongwith Mr. Khawas Khan, SI for respondents present.

Learned counsel for the appellant submitted an application for correction of name of respondent No.4 in the panel of respondents which is placed on file. Application is allowed and the Office is directed to make necessary entry with red ink. Notice be also issued to respondent No.4 for written reply/comments.

Adjourned to 01.03.2021 before S.B at camp court Swat.

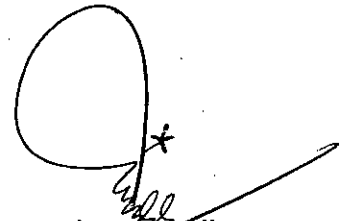


(Mian Muhammad)

01.03.2021

Appellant in person present. Mr. ~~Mr. Zameer~~ Khattak, District Attorney alongwith Mr. Khawas Khan, SI for respondents present.

Written reply on behalf of respondents No. 1 to 3 have already been submitted while respondent No. 4 rely on the same. To come up for rejoinder and arguments on 04.05.2021 before D.B at camp court Swat.



(Mian Muhammad)
Member(E)
Camp Court Swat

Due to covid, 19 therefore to come up for the same on 5/12/21

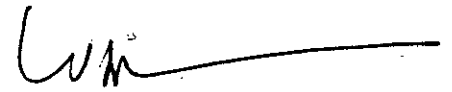


03.11.2020

Appellant in person present.

Muhammad Jan learned Deputy District Attorney alongwith Khawas Khan Inspector for respondents No. 1 to 3 present.

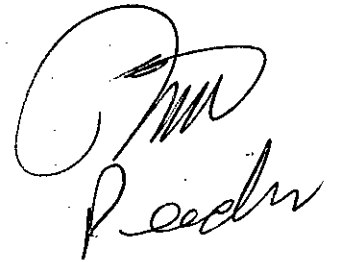
Written reply on behalf of respondents No.1 to 3 submitted. Learned DDA requested for time to contact respondent No.4 for submission of written reply/comments; granted. To come up for written reply/comments on behalf of respondent No.4, on 08.12.2020, before S.B at Camp Court, Swat.



Member (E)
Camp Court, Swat

8/12/20

Due to COVID-19 case is
adjoined to 02-02-2021 for the
same as before.



08.09.2020

Appellant in person present.

Appellant submitted application for permission ^{to} deposit security and process fee, which is placed on file. Application is allowed. Appellant is directed to deposit security and process fee within three (03) days. Thereafter notice be issued to the respondents for written reply/comments. To come up for written reply/comments on 07.10.2020 before S.B at Camp Court, Swat

Appellant Deposited
Security & Process Fee

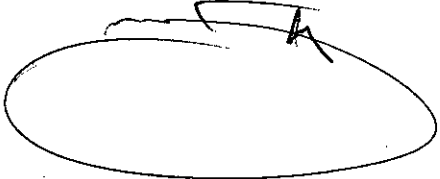
7/11/20


(Rozina Rehman)
Member
Camp Court, Swat

07.10.2020

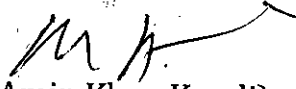
Appellant is present in person. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Khawas Khan, Inspector (Legal) are also present.

Written reply on behalf of respondents not submitted. Representative of the department is seeking time to furnish written reply/comments. Adjourned to 03.11.2020 on which to come up for written reply/comments before S.B at Camp Court, Swat.


(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT SWAT

09.01.2020

Appellant in person present and requested for adjournment on the ground that his counsel is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 05.03.2020 for preliminary hearing before S.B at Camp Court Swat.

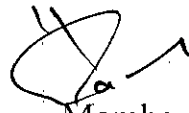

(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

05.03.2020

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Junior Clerk) has filed the present service appeal for the issuance of direction to the respondent department to promote him to the rank of Senior Clerk with all back benefits fixing his seniority from 22.07.2013.

Submissions made by the learned counsel for the appellant, need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 08.04.2020 before S.B at Camp Court, Swat.


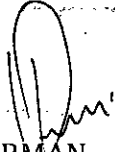


Member
Camp Court, Swat.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1498/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/11/2019	<p>The appeal of Mr. Noor Khan presented today by Mr. Said Karim Shalman 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 7/11/19</p>
2-		<p>This case is entrusted to touring S. Bench Swat for preliminary hearing to be put up there on <u>5-12-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	05.12.2019	<p>Clerk to counsel for the appellant present and seeks adjournment as learned counsel for the appellant is not in attendance. Adjourn. To come up for preliminary hearing on 09.01.2020 before S.B at Camp Court, Swat.</p> <p style="text-align: right;"> Member Camp Court, Swat</p>

05.10.2021

Nemo for parties.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General present.

Preceding date was adjourned on a Reader's note, therefore, both the parties be put on notice for 08.12.2021 before D.B at Camp Court, Swat.

(Atiq ur Rehman Wazir)
Member(E)
Camp Court, Swat

(Rozina Rehman)
Member(J)
Camp Court, Swat

Post Script
05.10.2021

Later on, learned counsel for appellant appeared and submitted additional documents through an application, with a request for adjournment. Adjourned. To come up for arguments on 08.12.2021 before D.B at Camp Court, Swat.

(Atiq ur Rehman Wazir)
Member(E)
Camp Court, Swat

(Rozina Rehman)
Member(J)
Camp Court, Swat

BEFORE THE SERVICE TRIBUNAL KHYBER

PAKHTUNKHWA AT PESHAWAR

Service Appeal No. 1498 of 2019.

**SCANNED
KPSI
Peshawar**

Noor khan (Junior Clerk/ Establishment Clerk) S/o Mashal Khan R/o Aqba
Town Saidu Sharif, District Swat.

.....Petitioner

VERSUS

Inspector General of Police (IGP) at Peshawar and others.

.....Respondents

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S.#	Description	Annexure	Pages No
1.	Service appeal along with certificate & list of Books	-	1-5
2.	Affidavit	-	6
3.	Addresses of the parties	-	7
4.	Copies of CNIC and Service Card	"A" "B"	8-9
5.	Copy of FIR	"C"	10
6.	Copies of order dated 23/08/2019 and order dated 02/06/2016	"D"	11-12
7.	Copies of Mercy Petition, Notification dated 22/07/2103 and dated 13/07/2015	"E" "F"	13-38
8.	Copies of application/representation dated 18/09/2019 and order dated 08/10/2019	"G" "H"	39-42
9.	Wakalatnama		42.


SAID KARIM SHALMAN

Advocate, High Court.

Office: -

Room #: D-22, 23 Shalman Law Chamber,
Continental Plaza
Makanbagh Swat.

Cell No: 0300-5740744

①

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Service Appeal No. _____ of 2019

Noor khan (Junior Clerk/ Establishment Clerk) S/o Mashal Khan R/o Aqba.
Town Saidu Sharif, District Swat.Appellant

VERSUS

- (1) Inspector General of Police (IGP) at Peshawar.
- (2) Regional Police Officer, Malakand Region (RPO), at Saidu Sharif, District Swat.
- (3) District Police Officer (DPO) at Gul kada Saidu Sharif Swat.
- (4) Government of Khyber Pakhtunkhwa through Secretary Interior at Peshawar Secretariat.

.....**Respondents**

APPEAL AGAINST THE ORDER DATED 08/10/2019
NO.CPO/CPB/301 WHEREBY THE APPLICATION
/REPRESENTATION FILED BY APPELLANT FOR
PROMOTION TO THE RANK OF SENIOR CLERK AND
FIXING HIS SENIORITY HAS BEEN DISMISSED BY
RESPONDENT NO. 01.

PRAYER:

IT IS THEREFORE HUMBLY PRAYED THAT ON
ACCEPTANCE OF THIS INSTANT APPEAL, THE

IMPUGNED ORDER DATED 08/10/2019
NO.CPO/CPB/301 MAY KINDLY BE SET ASIDE
AND RESPONDENT BE DIRECTED TO PROMOTE
THE APPELLANT TO THE RANK OF SENIOR
CLERK WITH ALL BACK BENEFITS FIXING HIS
SENIORITY FROM 22/07/2013.

ANY OTHER RELIEF NOT SPECIFICALLY PRAYED BUT
THIS AUGUST COURT DEEMS PROPER MAY ALSO BE
GRANTED IN FAVOR OF APPELLANT.

Respectfully Sheweth:

Facts;

1. That the appellant is resident of Aqba Town Saidu Sharif, District Swat and is performing his duties as junior clerk/establishment clerk in the office of District Police Officer (DPO) Swat. (Copies of CNIC and Service Card are attached herewith as Annexure "A" & "B")
2. That on 24/12/2015 FIR No. 872 dated 24/12/2015 U/s 406/419/468/471/477-A/473/147/149/109 PPC Police Station Banr Mingora Swat was registered against the official of driving license branch District Swat whereby appellant was also charged in the said FIR although the appellant was performing his duties as clerk in RTA department, Motor Vehicle examiner. (Copy of FIR is attached as Annexure "C")

3. That after inquiry on the basis of inquiry report the respondent No. 03 vide order dated 23/08/2016 awarded punishment of stoppage of promotion for one year to appellant, thereafter vide order dated 02/06/2016 appellant was released/discharged by the competent court of Judicial Magistrate I Swat from all the charges/allegation level against appellant in the above mentioned FIR. (Copies of order dated 23/08/2019 and order dated 02/06/2016 is attached as Annexure "D")

4. That thereafter applicant filed Mercy Petition dated 28/08/2019 for expunging adverse remarks from ACR for the year 2015, during the pendency of the said Petition on 16/09/2019 appellant come to know the respondents vide Notification No. 17477/E-III dated 22/07/2103 and Notification No. 1002/CPB dated 13/07/2015 have promoted some Junior Clerks from the appellant and have deprived the appellant of his right of promotion and seniority, thereafter appellant filed application/representation on 18/09/2019 for promotion as senior clerk with back benefits and fixing of his seniority from 22/07/2013, whereby respondent No. 01 vide order dated 08/10/2019 has dismissed the application/representation of appellant. (Copies of Mercy Petition, Notification dated 22/07/2103, dated 13/07/2015 application/representation dated 18/09/2019 and order dated 08/10/2019 are attached as Annexure "E", "F", "G" and "H")

5. That being aggrieved from the impugned order of respondent No. 01 there is no other adequate remedy but to file this instant appeal, the impugned order dated 08/10/20-19 is liable to be set aside inter alia on the following grounds.

GROUNDS:

- A) That the impugned order dated 08/10/2019 of respondent No. 01 is patently illegal, unlawful without lawful authority and of no legal effect.

- B) That the appellant has been appointed on 23/07/2004 as Naib Qasid and thereafter has been promoted to Junior Clerk on 11/07/2008 and since then the appellant has not been considered for promotion by respondents till date, while during this period the respondents have illegally unlawfully without authority promoted many junior clerks to the post Senior clerks who were juniors from appellant. Thus by this way respondents have deprived the petitioner from his basic and fundamental rights guaranteed in the service law, rules and regulations.

- C) That the impugned order dated 08/10/2019 is unlawful, illegal and against the service laws, rules and regulations. hence, liable to be set aside.

- D) That any other grounds will be advanced at the time of arguments with the prior permission of this honorable Court.

It is therefore humbly prayed that on acceptance of this instant appeal, the impugned Order dated 08/10/2019 No.CPO/CPB/301 may kindly be set aside and respondent be directed to promote the appellant to the rank of senior clerk with all back benefits fixing his seniority from 22/07/2013.

Any other relief not specifically prayed but this august court deems proper may also be granted in favor of appellant.

Appellant

Through

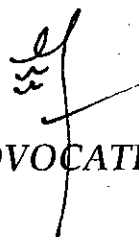


SAID KARIM SHALMAN

Advocate, High Court

CERTIFICATE

Certified that no appeal has been filed earlier by the appellant before this Honorable court as per instruction of my client.


ADVOCATE

LIST OF BOOKS

1. Constitution of Islamic Republic of Pakistan 1973.
2. Other relevant Service Laws, rules & case laws.


ADVOCATE

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Service Appeal No. _____ of 2019

Noor khan (Junior Clerk/ Establishment Clerk) S/o Mashal Khan R/o Aqba
Town Saidu Sharif, District Swat. **Appellant**

VERSUS

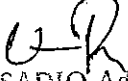
Inspector General of Police (IGP) at Peshawar and others.

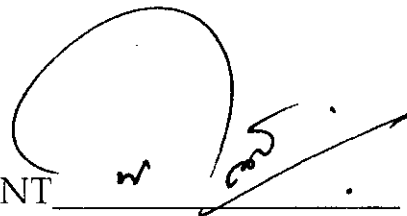
..... **Respondents**

AFFIDAVIT

I, Noor khan (Junior Clerk/ Establishment Clerk) S/o Mashal Khan R/o Aqba Town Saidu Sharif, District Swat, as per instruction of my client, do hereby affirm and declare that all the contents of this appeal are true and correct to the best of my knowledge and nothing has been kept Concealed before this Honorable Court.

ATTESTED


UMAR SADIQ Advocate,
OATH COMMISSIONER
Distt: Courts Swat.
No. 301.....Date 6/11/2019


DEPONENT

Noor khan S/o Mashal Khan

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Service Appeal No. _____ of 2019

Noor khan (Junior Clerk/ Establishment Clerk) S/o Mashal Khan R/o Aqba
Town Saidu Sharif, District Swat. Appellant

VERSUS

Inspector General of Police (IGP) at Peshawar and others.

.....Respondents

ADDRESSES OF PARTIES

PETITIONER:

Noor khan (Junior Clerk/ Establishment Clerk) S/o Mashal Khan R/o Aqba
Town Saidu Sharif, District Swat.

Cell No: 03472858585 NIC No: 15602-4113526-9.

RESPONDENTS:

1. Inspector General of Police (IGP) at Peshawar.
2. Regional Police Officer, Malakand Region (RPO), at Saidu Sharif,
District Swat.
3. District Police Officer (DPO) at Gul kada Saidu Sharif Swat.
4. Government of Khyber Pakhtunkhwa through Secretary Interior at
Peshawar Secretariat.

Petitioner

Through


SAID KARIM SHALMAN

Advocate, High Court

8

حکومت پاکستان
 قومی شناختی کارڈ
 15602-4113526-9
 محمد خان
 سندھ
 تحصیل کراچی
 عثمان یوسف بھٹو
 تاریخ پیدائش: 01/04/1986
 دستخط مسٹر عثمان بھٹو
 دستخط مال کارڈ

شناختی نمبر: 15602-4113526-9 نام: محمد خان نمبر: U3492W
 موجودہ پتہ: نیو انیا، مارون، اقراء سکول، سیدو شریف، تحصیل باہرانی
 پیش سوات
 مستقل پتہ: ایضاً
 تاریخ اجراء: 09/05/2016 تاریخ ترمیم: 09/05/2026
 مقررہ کارڈ کے برقریبی لیٹر ٹیکس میں ڈال دیں




Attested
 Said Karim Shalman
 ADVOCATE,
 High Court Peshawar.

9

POLICE
 Khyber Pakhtun Khwa
 District Swat

Police ID Card


Reg. No. 08



Noor Khan
 Junior Clerk / Establishment Clerk

District Police Officer, Swat

SWAT



POLICE

F/Name: Mashal Khan
 NIC No.: 15602-4113526-8
 Tell: No: 0347-285 8585
 D.O.Birth: 01-04-1986
 D.O.Appo: 23-07-2004
 Blood G: B+
 Height: 5'7"
 Eyes: Green
 D.O.Issue: 07-05-2017 D.O.Exp: 06-05-2020
 Address: Aqba Town Saidu Sharif Swat

Attested:

Said Karim Shalman
 ADVOCATE,
 High Court Peshawar.

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دہشت اندازی پولیس رپورٹ شدہ زیر دفعہ 152-A مجموعہ ضابطہ نوچہداری

خطہ بند	ضلع	سوائے
05	872	قنطنہ توارنگ
وقت رپورٹ	تاریخ	وقت
12:33:53	24-12-11	4:00
کونٹا اطلاع دہندہ	کونٹا اطلاع دہندہ	کونٹا اطلاع دہندہ
16101-1233533-9	03412848417	SHO
پہنچت جرم (معدومہ) حال اگر کچھ لیا گیا ہو۔	پہنچت جرم (معدومہ) حال اگر کچھ لیا گیا ہو۔	پہنچت جرم (معدومہ) حال اگر کچھ لیا گیا ہو۔
147, 149, 109	473, 406, 477A, 471, 468, 419	419, 468, 471, 477A, 473, 406, 147, 149, 109
دورہ فاصلہ ٹھانسنے اور سمت	دورہ فاصلہ ٹھانسنے اور سمت	دورہ فاصلہ ٹھانسنے اور سمت
کونٹا لرم	کونٹا لرم	کونٹا لرم
کی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	کی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	کی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو
ستہ روانگی کی تاریخ و وقت	ستہ روانگی کی تاریخ و وقت	ستہ روانگی کی تاریخ و وقت
		پہ سیل ڈاٹ

ابتدائی اطلاع نیچے درج کرو۔ بذریعہ ڈاٹ کاغذات انٹرویو سے حاصل کیا گیا۔

1. سید انور شری صاحب سے اسکا افسانہ بالا مقدمہ جرم بالا برخلاف 1) سید اسحاق

2. سید طوطا خان صاحب سے اسکا افسانہ بالا مقدمہ جرم بالا برخلاف 2) سید باجو ولد حکم جان آبن

3. سید ذرارہ ٹون سے، 3) میا دہلہ ولد علی سید آبن سید کا نندہ صاحب سے طوطا خان

4. فضل ملک عرف مائیک ولد فضل خالق آبن وقتے جادوہ بند 5) سلطنت

6) سید ایف ایف آبن امیر خان نوکیلی 6) عامگیر ولد اسماعیل آبن

7) سید ذرارہ علی لائین کلرٹ سے 7) فرمان نائیب صاحبہ MVE آفس

8) نور خان کلرٹ سے لائین برائج وغیرہ درج رہے چونکہ ملزمان 1) سید اسحاق

9) نور باجو 3) میا دہلہ 4) فضل ملک 5) عامگیر لوگوں سے دھوکہ دیا گیا ہے

10) نور باجو لائین بنوانے کا جھانسنہ دیکر رقم وصول کرتا ہے۔ مگر سلطنت خان ولد

11) سید ایف ایف ڈاکٹر کا جعلی ہیرے خانہ لوگوں سے فدا ڈر رقم وصول کرتا ہے

12) سید ذرارہ علی لائین کلرٹ سے، فرمان نائیب صاحبہ، MVE آفس اور نور خان کلرٹ

13) لائین برائج بالائیک نامی ملکی بھگت سے پڑنے والا MVA کے دستخط سے لائین

14) غدا سے دھوکہ دیا گیا برخلاف قانون لائین نیارکے رقم وصول کرتا ہے

15) خلاف ملزمان بالا مقدمہ جرم بالا درج رہے چونکہ نقل FIR سے

16) لائین برائج کا غدا سے ملاقاتیں حوالہ نہیں کیا جاتا ہے۔

Said Karim Shalwan
ADVOCATE,
High Court Peshawar.

(محمد انور خان)

INSP: SHO-PS-BUNR
24-12-015

ORDER

This order will dispose of the departmental enquiry against Junior Clerk Noor Khan, while posted as MVE Clerk, Swat (Now this office) was involved in case vide FIR No.872 dated 24/12/2015 u/s 419/468/471/477A/473/406/147/149/109 PPC Police Station Banr.

He was issued Charge Sheet coupled with statement of Allegations and Mr. Saddique Akbar, DSP/City, Swat was deputed as Enquiry Officer. The Enquiry Officer conducted proper departmental enquiry against the delinquent official, recorded the statements of all concerned officers, and also perused his Service record. He provided ample opportunity to the delinquent official to defend the charges leveled against him. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings wherein he recommended the delinquent Official for appropriate punishment.

Therefore, in exercise of the powers vested in the undersigned under efficiency & disciplinary Rules 1973 (Amnd: 2011) read with Notification issued vide CPO/Khyber Pakhtunkhwa, Peshawar No.8511-8615/E-V, dated 28-12-2015 I, Muhammad Saleem Marwat, P.S.P, District Police Officer, Swat as a competent authority, am constrained to award him the punishment of Stoppage of Promotion for One Year with immediate effect.

Order announced.

[Signature]
District Police Officer, Swat

O.B. No. 147
Dated 23/8 /2016.

OFFICE OF THE DISTRICT POLICE OFFICER, SWAT.

No 9976-77 E, dated Gulkada the 23/08 /2016.

Copy of above is submitted to the:-

- 1) Worthy Inspector Genera of Police, Khyber Pakhtunkhwa, Peshawar for favour of information please.
- 2) Regional Police Officer, Malakand Region at Saidu Sharif, Swat for favour information with reference to Region Office, Swat Endst: No. 20-31/E, dated 01-01-2016 please.

Admitted
[Signature]
Said Karim Shalman
ADVOCATE,
Hgh Court Peshawar.

[Signature]
District Police Officer, Swat

02.06.2016

APP for the state prescp.

Final report U/S 175 Cr.P.C with application U/S 4C(11) read with section 15(B) of the KPK Prosecution Act, 2005 by the DPP Swat for discharging of the accused namely Muhammad Ishaq, Noor Bacha, Zia Ullah, Fazal Malik, Sultanat Khan, Alamgir Khan, Sardar Ali, Farman Ali and Noor Khan in the case in hand FIR No.872 dated 24.12.2015 of P.S Bunn Swat for offences U/Ss 406/419/468/471/477A/473/147/149/109 PPC was received today it be registered.

Vide the above referred application, the DPP, Swat has made submission that no sufficient evidentiary material to lead to conviction of the accused for commission of the offences are available on record in the case and that therefore, they be discharged from the allegations.

In the light of the submission by the DPP, Swat, the case available record perused:

It revealed that though statements recorded U/S 164 Cr.P.C of some persons to the effect that certain amounts were taken from them by the accused namely Sultanat Khan and Fazal Malik for preparing/procuring driving licenses for them but neither any license could be prepared/procured for them nor the amounts were returned are available on record yet no any specific date and time of any such occurrences has been mentioned anywhere in the record. Thus, the submissions made by prosecution branch are conceded and the accused are discharged from the allegations leveled against them herein. The sureties are absolved from the liability of bail bonds.

File be consigned to the record room after necessary completion and compilation.

Announced: 9.2.81
02.06.2016

Annexed
Said Karim Shalman
ADVOCATE
High Court Peshawar

12.7.16
12.7.16
12.7.16

(URADU LATI)
Judicial Magistrate/1st
Swat
6.000

[Handwritten signature]
12.7.16

بخدمت جناب انسپکٹر جنرل آف پولیس صاحب، ضویہ خیبر پختونخواہ، پشاور۔

عنوان: رحم ایبل میں مراد کے مسائل کے ACR میں سال 2015 میں Adverse Remarks لگائے گئے ہیں کو Expunge کرنے کا حکم صادر فرمایا جاوے۔

جناب عالی!

حسب ذیل عرض ہے!

۱۔ یہ کہ مسائل بطور جونیئر کلرک دفتر جناب ڈسٹرکٹ پولیس آفیسر (DPO) صاحب میں تعینات ہے۔

۲۔ یہ کہ مورخہ 24-12-2015 کو محکمہ ڈرائیونگ لائسنس برانچ سوات کے اہلکاران کے خلاف

FIR علت نمبر 872 زیر دفعات PPC/109/147/1473-A/477-471/468/419/406

تھانہ بنڑینگورہ سوات چاک کیا گیا۔ جس میں من مسائل کو غیر قانونی بلا جواز اور غلط طور پر نامزد کیا گیا۔ حالانکہ من مسائل اس وقت موٹر ویکل ایگزامینر (MVE) بطور کلرک محکمہ RTA سوات کے ساتھ تعینات تھا۔
(نقل FIR لف ہے)۔

۳۔ یہ کہ مذکورہ بالا مقدمہ کے بناء پر من مسائل کے ACR برائے سال 2015 میں Adverse Remarks لگائے گئے۔ (نقل ACR لف ہے)۔

۴۔ یہ کہ بعد ازیں مجاز عدالت جناب جوڈیشل مجسٹریٹ صاحب اول سوات نے بروئے حکم و فیصلہ محررہ 02-06-2016 من مسائل کو Discharge کرنے کا حکم صادر فرمایا۔
(نقل حکم محررہ 02-06-2016 لف ہے)۔

۵۔ یہ کہ معزز عدالت بالا کے حکم کے بعد من مسائل نے آپ حضور کو ایک درخواست بابت Expunge کرنے Adverse Remarks در ACR برائے سال 2015 من مسائل گزاری اور مسائل کو طلب کرنے کے باقاعدہ طور پر سنا گیا اور جناب DIG صاحب ہیڈ کوارٹر کے زبانی تسلی پر من مسائل سوات واپس آیا۔
(نقل درخواست لف ہے)۔

۶۔ یہ کہ من مسائل Promotion Zone میں ہے اور محکمہ پولیس میں Promotion متوقع تھے۔ جس میں من مسائل نے معلومات کئے تو مسائل کے نوٹس میں یہ بات آئی کہ مسائل کے ACR برائے سال 2015 سے Adverse Remarks تا حال Expunge نہیں ہوئے ہیں۔ لہذا من مسائل نے ایک درخواست دفتر

ہذا کو برائے پیش ہونے گزاری۔ (نقل درخواست اور چھٹی جناب DIG صاحب لف ہیں)۔

(جاری)

Said Karim Shalman
ADVOCATE,
Main Court Peshawar.

۷۔ یہ کہ بعد ازاں من مسائل کو بذریعہ موبائل فون اطلاع دی گئی کہ وہ مورخہ 21-08-2019 کو روہڑہ
 جناب AIG سٹیبلشمنٹ بمقام CPO پشاور پیش ہوا اور من مسائل تاریخ مذکورہ کو روہڑہ آفسر بالا پیش ہوا۔ جہاں
 پر من مسائل کو مطلع کیا گیا کہ مسائل کے اپیل File کی گئی اور مزید یہ کہ آفسر مذکورہ بالا کو کوئی اختیارات حاصل نہیں
 رہا۔ اور من مسائل کو مزید کارروائی کرنے کا کہا گیا۔ (نقل چھٹی لف ہے)۔

۸۔ یہ کہ من مسائل کے پاس اب رحم البیل ہذا کے سوا کوئی چارہ نہیں۔ مسائل ایک غریب خاندان سے تعلق رکھتا
 ہے۔ اور جب من مسائل کو مذکورہ بالا کو غلط اور بے بنیاد FIR میں نامزد کیا گیا تو اس صدمے کو میرے والد برداشت
 نہ کر پائے جس کے نتیجے میں ان کو Hear Attack ہوا اور وفات پا گئے۔

(نقل Death Certificate لف ہے)۔

۹۔ یہ کہ مذکورہ بالا مقدمہ سے من مسائل کا کسی قسم کا کوئی واسطہ نہ تھا۔ کیونکہ مذکورہ مقدمہ ڈارائیونگ لائسنس
 برائے سوات پر دائر ہوا تھا۔ جبکہ اُس وقت من مسائل محکمہ RTA کے ساتھ بطور MVE کلرک تعینات تھا۔ من
 مسائل نے ہمیشہ پوری ایمانداری کے ساتھ اپنی ڈیوٹی سرانجام دی ہے۔ کیونکہ میرے بے گناہی کا ثبوت میرے
 ٹرانسفر پوسٹنگ آرڈرز ہیں جو کہ ہمراہ لف ہیں۔

۱۰۔ یہ کہ من مسائل کو مجاز عدالت نے مذکورہ بالا الزامات مقدمہ سے ڈسچارج کیا ہے۔ لہذا قانون و انصاف کا
 تقاضا ہے۔ کہ من مسائل کے ACR برائے سال 2015 سے Adverse Remarks کو Expunge
 کیا جائے۔

لہذا استدعا ہے کہ بمنظور رحم البیل ہذا من مسائل کو ACR برائے سال 2015 سے Adverse
 Remarks کو Expunge کرنے کا حکم صادر فرمایا جائے۔

العارض

نور خان جویمیر کلرک
 دفتر جناب DPO سوات۔
 المرقوم: 28-08-2019

Accepted.
 Said Karim Sultan
 ADVOCATE
 District Court, Peshawar

24/07 2013 10:14 FAX 0919210927

IGP N.W.F.P.

Attested
Said Karim Shalman
ADVOCATE,
High Court Peshawar

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001

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

2508/16
24-7-2013
Range Peshawar

NOTIFICATION

No. 17477 /E-III, PROMOTION AS OFFG: SENIOR CLERK : BPS-09. Having been recommended by the DPC held on 05.07.2013, approved by Addl: IGP/HQrs, the following Junior Clerks are hereby promoted as Offg: Senior Clerk in (BPS-09) Rs. (6200-380-17600) with immediate effect:-

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

No. 17478 /E-III Transfer/postings: On promotion as Offg: Senior Clerk (BPS-09), their transfer/posting detail given below are hereby ordered with immediate effect.

S/No	Name	D.O. Birth & Domicile	Present Posting	Remarks	Posted on promotion Senior Clerk:
1.	Gul Rehman	Bannu 05.05.69	DPO Lakki Office	Promoted conditionally subject to the provision of good ACRs for the following period/years within 03 months:- 18.09.2009 to 31.12.2009 Year 2010, 29.09.2011 to 31.12.2011, Year 2012	Bannu Region
2.	Muhammad Abid	Kohat 12.10.68	FRP Kohat	Promoted conditionally subject to the provision of good ACRs for the years 2008 & 2012 within 03 months.	Kohat Region
3.	Muhammad Bitat	Kohat 24.02.68	Inv: Kohat	Promoted conditionally subject to the provision of good ACRs for the year 2008 & 2012 within 03 months.	Kohat Region
4.	Ghaffar Ali	Charsadda 08.09.66	DPO Office Charsadda	Promoted conditionally subject to the provision of good ACRs for the years 2011 & 2012 within 03 months:	Charsadda attached for purpose of pay CPO
5.	Imdad Hussain Shah	Bannu 25.03.69	DPO Lakki Office	Promoted conditionally subject to the provision of good ACRs for the following period/years within 03 months:- 01.01.2008 to 08.04.2008, 18.09.2009 to 21.12.2009 Year 2010, 14.08.2011 to 31.12.2011 & Year 2012	Kohat Region
6.	Muhammad Saeed	Mardan 01.10.68	DPO Office Mardan	Promoted conditionally subject to the provision of good ACRs for the years 2011 & 2012 within 03 months.	Mardan Region
7.	Muhammad Arif	Dikhan 15.02.67	DPO Office Dikhan	Promoted conditionally subject to the provision of good ACRs for the following period/years within 03 months:- 01.01.2008 to 06.07.2008 & Year 2012	Dikhan Region
8.	Israr Ali	Peshawar 03.03.72	CCP	Promoted conditionally subject to provision of good ACRs for the year 2008 within 03 months.	CCP Peshawar
9.	Ijaz Khan	Abbottabad 04.01.68	DPO Office Haripur	Promoted conditionally subject to the provision of good ACRs for the year 2012 within 03 months.	Hazara Region
10.	Zamin Khan	MKD Agency 20.03.67	SSP/A. Abad	Promoted conditionally subject to the provision of good ACRs for the following period/year within 03 months:- 01.01.2008 to 20.08.2008 Year 2009, 01.01.2010 to 30.04.2010, Year 2011 & 2012	Hazara Region
11.	Khan Sahadar	Karak 02.01.72	DPO Office Karak	Promoted conditionally subject to the provision of good ACRs for the year 2008, 2011 & 2012.	Kohat Region
12.	Faridullah Khan-I	Lakki 12.09.68	DPO Office Lakki	Promoted conditionally subject to the provision of good ACRs for the following period/year within 03 months:- 01.01.2008 to 17.09.2008, 18.09.2009 to 31.12.2010, Year 2010 29.09.2011 to 31.12.2011 & Year 2012	Dikhan Region
13.	Fazle Maula	Peshawar 12.05.75	CCP	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 01.01.2008 to 10.09.2008 & Year 2012	Spl: Branch

Accepted

Said Karim Shahman
ADVOCATE,
High Court Peshawar

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24/07/2013 10:15 FAX 0919210927

IGP N.W.F.P.

002

Name	D.O. Birth & Domicile	Present Posting	Remarks	Posted on promotion as Senior Clerk I CPO
Muhammad Ajmal	Charsadda 12.10.70	Investigation Peshawar	Promoted conditionally subject to provision of good ACRs for the following period / year within 03 months:- 01.01.2008 to 16.05.2008, 01.01.2009 to 31.03.2009, 15.07.2009 to 31.12.2009, 01.01.2010 to 08.06.2010 & year 2012	
Inayat ul Rehman	MKD Agency 08.02.68	DPO Swabi ⑦	Promoted conditionally subject to provision of good ACRs for the following period / year within 03 months:- 01.01.2008 to 19.04.2008 Year 2011 & Year 2012	Matakand Regio
Jamal Shah	MKD Agency 11.02.76	DPO Office Charsadda	Promoted conditionally subject to provision of good ACRs for the following period / year within 03 months:- 01.01.2008 to 18.07.2008 & year 2011 & 2012	Charsadda
Gul Akbar	MKD Agency 22.03.75	Budget Branch CPO	Promoted conditionally subject to provision of good ACRs for the following period / year within 03 months:- 01.01.2008 to 29.04.2008, year 2009, 2011 & 2012.	CPO
Tajdar Muhammad	Kohat 16.12.70	DPO Office Karak	Promoted conditionally subject to provision of good ACRs for the year 2008 & 2012 within 03 months.	Kohat Region
Munir Muhammad Abid	Dikhan 10.03.71	Inv: Tank	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months.	Dikhan Region
Falak Naz	Bannu 12.12.66	FRP Bannu	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 01.06.2008 to 31.12.2008, year 2009 & 2012.	FRP Bannu
Javed Iqbal	Bannu 01.03.75	DPO Office Karak	Promoted conditionally subject to provision of good ACRs for the year 2008 within 03 month.	Kohat Region
Zahid Nazir	Mansehra 10.06.75	Hazara Region	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 01.01.2008 to 30.06.2008, 19.09.2009 to 31.12.2009, 01.01.2010 to 16.07.2010 & Year 2012	Hazara Region
Gulab Shahzada	Kohat 05.04.77	SP/Inv: Karak	Promoted conditionally subject to provision of good ACRs for the period from 01.01.2008 to 30.06.2008 within 03 month.	Kohat Region
Tehseenullah	Bannu 01.03.72	RPO Bannu	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 01.01.2008 to 08.04.2008, 29.09.2011 to 31.12.2011 & 01.01.2012 to 29.04.2012	Bannu Region
Ali Muhammad	Hazara 12.11.75	Inv: Abbottabad	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- Year 2008, Year 2009, 01.01.2010 to 15.07.2010 & Year 2012	Hazara Regio
Muhammad Arshid	Mansehra 10.11.69	Hazara Region	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 01.01.2008 to 06.04.2008, 19.09.2009 to 31.12.2009 Year 2010 01.01.2011 to 29.09.2011 & Year 2012	Hazara Regio
Habibullah	Karak 01.10.74	Inv: office Karak	Promoted conditionally subject to provision of good ACRs for the period from 01.01.2008 to 30.06.2008 within 03 months.	Kohat Regio
Shanid Ullah	Bannu 06.12.82	DPO Office Bannu	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 19.07.2008 to 31.12.2008, 01.01.2011 to 09.05.2011 01.01.2012 to 30.04.2012	DPO/Bannu
Muhammad Ayaz	Peshawar 02.01.73	Tele K.P	Promoted conditionally subject to provision of good ACRs for the period from 11.05.2012 to 31.12.2012 within 03 months.	Tele Peshawar

Attested
Said Karim Shahman
Advocate Peshawar

17 18

24/07 2013 10:16 FAX 0919210927

IGP

marks

004
Posted on promotion as

24/07 2013 10:15 FAX 0919210927

IGP N.W.F.P.

003

Name	D.O. Birth & Domicile	Present Posting	Remarks	Posted on promotion Senior Clerk: Kohat Region
10. Tatheer Hussain	Kohat	Kohat Region	Promoted conditionally subject to provision of good ACRs for the following period/years within 03 months:- 01.01.2009 to 12.07.2009 Year 2011 & 2012	
11. Noor Zaman	Swabi	Mardan Region	Promoted conditionally subject to provision of good ACRs for the following period/years within 03 months:- 11.07.2008 to 31.12.2008 Year 2011 & 2012	DPG/Swabi
12. Muhammad Tariq	Mardan	Mardan Region	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months	DPO/Swabi
13. Syed Inayat Hussain	Kohat	Kohat Region	Promoted.	Kohat Region
14. Iftikhar Khan	Nowshera	Inv: CPO	Promoted conditionally subject to provision of good ACRs for the years 2011 & 2012 within 03 months.	CPO
15. Fayaz Ali	Charsadda	Charsadda	Promoted conditionally subject to provision of good ACRs for the years 2011 & 2012 within 03 months.	CPO
16. Qasim Khan	Charsadda	Charsadda	Promoted conditionally subject to provision of good ACRs for the years 2011 & 2012 within 03 months.	Kohat
17. Muhammad Suliman	Swat	Malakand Region	Promoted conditionally subject to provision of good ACRs for the period from 11.07.2008 to 31.12.2008 within 03 months.	Malakand Region
18. Shoukat Ali	Swat	Malakand Region	Promoted conditionally subject to provision of good ACRs for the period from 20.06.2012 to 31.12.2012 within 03 months.	Malakand Region
19. Mina Jan	Mardan	Mardan Region	Promoted conditionally subject to provision of good ACRs for the period from 11.09.2012 to 31.12.2012 within 03 months.	Mardan Region
20. Hidayat Ullah	Bannu	Bannu Region	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months.	DIKhan Region
21. Aftab ur Rehman	Karak	Kohat Region	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months.	Kohat Region attached for purpose of pay Hazara Region
22. Zubaid ur Rehman	Peshawar	Special Branch	Promoted.	Spl. Branch
23. Shereen Zaman	Bannu	Bannu Region	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months.	Spl. Branch
24. Asmat Ullah	DIKhan	D.I.Khan Region	Promoted.	D.I.Khan
25. Imdad Ullah	Charsadda	FRP HQrs	Promoted conditionally subject to provision of good ACRs for the years 11.07.2008 to 31.12.2008 Year 2009 & 2010 within 03 months.	FRP Peshawar
26. Baikhsh Khan	Peshawar	Inv: CPO	Promoted conditionally subject to provision of good ACRs for the years 2009 & 2012 within 03 months.	DCT SB
27. Mian Said Wahid	Swat	Malakand Region	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months. Year 2012.	Malakand Region
28. Humayun Khan	Peshawar	FRP Peshawar	Promoted conditionally subject to provision of good ACRs for the following period/year:- 11.07.2008 to 31.12.2008 Year 2010 & 2012	Spl. Branch
29. Sibghat Ullah	Bannu	Bannu Region	Promoted conditionally subject to provision of good ACRs for the following period/year:- 29.09.2011 to 31.12.2011 01.01.2012 to 29.04.2012	Bannu Region attached for purpose of pay Hazara Region
30. Umar Dher	Swat	Malakand Region	Promoted.	Malakand Region
		Agency	EA/CPO	AIG/Traffic

Name	D.O. Birth & Domicile	Present Posting	Remarks	Posted on promotion as Senior Clerk: To
Khawas Khan	Mardan	CPO	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months.	CPO
Nusrat Shah	Peshawar	FRP	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 11.07.2008 to 31.12.2008, Year 2009 & 2011	FRP Hazara
Ihsanullah	Lakki Marwat	Bannu Region	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 12.06.2009 to 31.12.2009 Year 2010 01.01.2012 to 15.04.2012	Hazara Region
Shahzad	Kohat	Kohat Region	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months:-	Kohat Region attached for the purpose of pay to Hazara Region
Syed Muhammad Tahir Shah	Peshawar	CCP	Promoted.	CCP
Bilal Hussain	Peshawar	CPO, Peshawar	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months:-	CPO
Ittikhar Ahmad	Charsadda	Investigation CPO	Promoted conditionally subject to provision of good ACRs for the period/year within 03 months:- 13.06.2009 to 31.12.2009 & Year 2012	CSP/Traffic
Malik Aman Khan	Nowshera	Investigation CPO	Promoted conditionally subject to provision of good ACRs for the year 2012 within 03 months:-	Inv: CPO
Saif ud Din	Kohat	Kohat Region	Promoted.	Kohat Region attached for the purpose of pay to Hazara Region
Farman Ali	Shangla	Malakand	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 13.06.2009 to 09.10.2009 01.01.2010 to 25.06.2010 & Year 2012	Malakand Region
Muhammad Nawaz	Dir Upper	Malakand Region	Promoted conditionally subject to provision of good ACRs for the following period/year within 03 months:- 13.06.2009 to 31.12.2009 & Year 2012	Malakand Region attached for the purpose of pay to Hazara Region
Muhammad Haroon	DIKhan	D.I.Khan Region	Promoted conditionally subject to provision of good ACR for the year 2012 within 03 months.	DIKhan Region attached for the purpose of pay to Hazara Region
Kifayat Ullah	Bannu	Bannu Region	Promoted conditionally subject to provision of good ACR for the period/year within 03 months:- 13.05.2009 to 31.12.2009 & year 2012	Bannu Region attached for the purpose of pay to Hazara Region
Muhammad Shoaib	Lakki	Bannu Region	Promoted.	Bannu Region attached for the purpose of pay to Hazara Region
Jalal ud Din	Lakki	Inv: CPO	Promoted conditionally subject to provision of good ACR for the period/year within 03 months:- 02.09.2010 to 31.12.2010 & year 2012.	Inv: Swat
Irfanullah	Lakki	Kohat Region	Promoted conditionally subject to provision of good ACR for the period/year within 03 months:- 18.09.2009 to 31.12.2009, year 2010, 14.08.2011 to 31.12.2011 & Year 2012	CPO
Farooq Shah	Charsadda	Charsadda	Promoted.	Elite

Amended
 Said Karim Shaikh
 ADVOCATE,
 Civil Court Peshawar.

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

19

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P
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17479-99/ E-III dated Peshawar the 22/7/2013.

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

1. Addl: IGP/HQrs Khyber Pakhtunkhwa, Peshawar.
2. Addl: IGP/Investigation Khyber Pakhtunkhwa, Peshawar.
3. Addl: IGP/Special Branch Khyber Pakhtunkhwa, Peshawar.
4. Addl: IGP/Commandant FRP Khyber Pakhtunkhwa, Peshawar.
5. Capital City Police Officer, Peshawar.
- ✓ 6. All Regional DisG in Khyber Pakhtunkhwa.
7. Deputy Inspector General of Police DCT SB Khyber Pakhtunkhwa, Peshawar.
8. Commandant PTC Hangu
9. Deputy Inspector General of Police, Traffic Khyber Pakhtunkhwa, Peshawar.
10. All DPOs in Khyber Pakhtunkhwa
11. SSP/Traffic Peshawar.
12. SP/Inv: Swat
13. Accountant General, Khyber Pakhtunkhwa Peshawar.
14. Registrar CPO, Peshawar.
15. Office Supdt: Secret-CPO, Peshawar.

Seen/EC
for collection

7-1-6

[Signature]
Regional Police Officer,
Malakand, at Saidu Sharif Swat.
24/7/2013

Attested
[Signature]
Said Karim Shalman
ADVOCATE,
High Court Peshawar.

SENIORITY LIST OF JUNIOR CLERKS (BPS-07) AS IT STOOD ON (31.12.2011)

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NO. 13053 /E-III, The Seniority list of Junior Clerks is published for information of all concerned.

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enlist:	DATE OF Selection Grade	REMARKS
1.	Muhammed Jamil	Peshawar	10 th	12.02.59	23.08.82		
2.	Muhammad Javed	Peshawar	10 th	11.09.64	01.10.83	05.09.88	
3.	Sardar Abas Haider	Peshawar	F.A	03.04.64	05.06.86	07.04.90	
4.	Iftikhar Rauf	Peshawar	10 th	25.02.68	06.07.87	16.02.91	
5.	Fazal Rabbi	Peshawar	10 th	01.12.68	01.10.87		
6.	Muhammad Saleem	Peshawar	10 th	10.09.64	08.11.82	15.10.91	
7.	Muhammad Shafiq	Karak	FA	01.05.62	02.11.87		
8.	Gul Said	Kohat	10 th	06.08.69	13.02.88		
9.	Abdul Karim	Peshawar	FA	01.05.68	09.04.88		
10.	Ibrar Hussain	Peshawar	10 th	13.08.66	02.05.86		
11.	Aziz -ur- Rehman	Peshawar	10 th	12.08.62	10.03.81	01.07.95	
12.	Sarfaraz Ahmad	Peshawar	10 th	24.04.68	15.11.87	02.10.95	
13.	Farmanullah	Nowshera	10 th	12.03.67	06.03.88	02.10.95	
14.	Gul Rehman	Bannu	10 th	05.05.69	10.04.88		
15.	Shabir Ahmad	Kohat	10 th	12.07.53	01.08.88	03.01.96	
16.	Sharafatullah	Peshawar	B.A	05.09.62	01.08.88	03.01.96	
17.	Liaqat Ali	Nowshera	D.Com	09.01.66	01.08.88		
18.	Amjad Ali Shah	Kohat	B.A	25.04.60	02.08.88	27.10.96	
19.	Muhammad Hameed	Mardan	F.A	12.03.67	06.08.88	27.10.96	
20.	Farzand Ali	Swabi	10 th	11.04.69	06.08.88	10.12.96	
21.	Jan Muhammad	Malakand Agency	BA	03.01.67	15.08.88		
22.	Gohar Ali	Swabi	10 th	05.05.69	15.08.88	06.01.97	
23.	Shakir Ullah	Kohat	FA	20.03.66	08.09.88		
24.	Shoaib	Swabi	10 th	01.01.69	08.09.88	16.11.98	
25.	Muhammad Shafi	Peshawar	B.A	10.02.62	15.09.88	16.11.98	
26.	Ihsanullah	Charsadda	10 th	11.05.67	19.09.88	16.11.98	
27.	Muhammad Abid	Kohat	FA	12.10.68	26.09.88		
28.	Muhammad Bilal	Kohat	BA	24.02.68	27.09.88		
29.	Ghaffar Ali	Charsadda	10 th	08.09.65	01.10.88	16.11.98	
30.	Sajjad Anwar	Kohat	F.A	12.02.67	02.10.88	16.11.98	
31.	Imdad Hussain Shah	Bannu	10 th	25.03.69	29.10.88	17.12.99	
32.	Muhammad Saeed	Mardan	FA	01.10.68	10.12.88	17.12.99	

Accepted.
Said Karim Shalman
ADVOCATE
High Court Peshawar.

Reverted to JC vide
No. 4093-95/E-III
dated: 10.02.2010

DT

	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enlist:	DATE OF Selection Grade	REMARKS
57	Israr Ali	Mardan	F.A	01.01.67	01.11.87 as N/Q 10.10.2001 as J/C	-	
158	Tehseenullah	Bannu	B.A	01.03.72	18.8.92 as Daftari 12.10.2001 as JC	-	
159	Ali Muhammad	Hazara	10 th	12.11.75	23.05.94 as C-IV 16.10.2001 as JC	-	
160	Nazir Ahmad	Hazara	10 th	04.04.70	12.11.91 as C-IV 17.10.2001 as JC	-	
161	Qayum Jan	Charsadda	F.A	18.5.78	12.05.98 as C-IV 18.10.2001 as JC	-	
162	Muhammad Arshid	Mansehra	10 th	10.11.69	16.02.91 as N/Q 19.10.2001 as JC	-	
163	Nasir Khan	Swat	F.A	06.01.77	07.07.96 as N/Q 19.10.2001 as JC	-	
164	Habibullah	Karak	F.A	01.10.74	07.07.99 as C-IV 14.01.2002 as JC	-	
165	Waheed Ahmad	Kohat	B.A	04.04.77	18.01.2000 as N/Q 26.01.2002 as JC	-	
166	Gul Karim	Charsadda	10 th	29.02.65	10.04.91	-	Vide Order Enst: No. 22788-91/E-III dated: 14.09.2009
167	Shahid Ullah	Bannu	FA	16.12.82	12.02.2004 N/Qasid 01.03.2008 JC	-	
168	Muhammad Ayaz	Peshawar	10 th	02.01.73	16.03.2005 N/Qasid 01.03.2008 JC	-	
169	Faisal Khan	Karak	FA	30.07.87	24.03.2005 N/Qasid 10.03.2008 JC	-	
170	Tatheer Hussain	Kohat	BA	09.03.84	01.01.2005 N/Qasid 11.07.2008 JC	-	
171	Noor Zaman	Swabi	10 th	24.02.72	24.05.1992 Daftari 11.07.2008 JC	-	
172	Muhammad Tariq	Mardan	10 th	01.04.70	1988 N/Qasid 11.07.2008 JC	-	
173	Iqbal Rizwan	Swat	FA	02.05.77	01.01.1977 N/Qasid 11.07.2008 JC	-	
174	Syed Inayat Hussain	Kohat	10 th	09.08.80	25.10.2000 N/Qasid 11.07.2008 JC	-	
175	Iftikhar Khan	Nowshera	FA	10.02.75	15.01.2004 Daftari 11.07.2008 JC	-	
176	Fayaz Ali	Charsadda	10 th	15.11.82	19.03.2005 N/Qasid 11.07.2008 JC	-	
177	Qasim Khan	Charsadda	10 th	14.05.70	13.03.1995 N/Qasid 11.07.2008 JC	-	
178	Sher Muhammad	Mardan	10 th	30.04.66	1988 Daftari 11.07.2008 JC	-	

Amended

Said Karim Shalman
ADVOCATE,
High Court Peshawar.

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enlist:	DATE OF Selection Grade	REMARKS
179	Muhammad Suliman	Swat	10 th	14.02.78	25.02.2006 Class-IV 11.07.2008 JC		22
180	Muhammad Nazir	Lakki	10 th	01.01.73	20.12.1999 N/Qasid 11.07.2008 JC		
181	Shoukat Ali	Swat	10 th	15.04.68	11.07.2008 JC		
182	Mina Jan.	Mardan	10 th	02.04.84	18.07.2005 N/Qasid 11.07.2008 JC		
183	Ihsanullah	Lakki	BA	31.03.74	09.09.1992 Daftari 11.07.2008 JC		
184	Hidayat Ullah	Bannu	BA	22.08.83	10.07.2006 Class-IV 11.07.2008 JC		
185	Taswar Hussain	Hangu	FA	01.01.82	18.08.2005 Class-IV 11.07.2008 JC		
186	Muhammad Ilyas-1 st	Charsadda	10 th	06.04.72	20.12.1995 N/Qasid 11.07.2008 JC		
187	Aftab ur Rehman	Karak	10 th	01.08.75	18.09.2003 Daftari 11.07.2008 JC		
188	Zubaid ur Rehman	Peshawar	FA	11.06.80	20.10.1998 Daftari 11.07.2008 JC		
189	Abdur Ghafoor	Lakki	BA	22.03.82	09.03.2005 N/Qasid 11.07.2008 JC		
190	Muhammad Farooq	Dir Lower	FA	05.04.78	15.08.1998 N/Qasid 11.07.2008 JC		
191	Shereen Zaman	Bannu	10 th	05.09.75	24.04.1996 N/Qasid 11.07.2008 JC		
192	Iftikhar Ali	Mardan	FA	10.02.84	29.04.2006 Class-VI 11.07.2008 JC		
193	Latif Ahmad Khan	Tank	FA	05.03.84	29.09.2003 N/Qasid 11.07.2008 JC		
194	Muhammad Afzal	Chitral	FA	07.10.75	30.06.1998 N/Qasid 11.07.2008 JC		
195	Nazeer Mehdai	Abbottabad	10 th	12.11.68	N/Qasid 11.07.2008 JC		
196	Asmat Ullah	DIKhan	10 th	01.04.80	03.01.2000 Daftari 11.07.2008 JC		
197	Shabeer Ahmad	Mansehra	10 th	10.03.81	06.10.2004 N/Qasid 11.07.2008 JC		
198	Mashkoo Hussain	Kohat	FA	15.11.1985	11.02.2004 Class-IV 11.07.2008 JC		
199	Saadat Ali	Chitral	FA	05.01.81	01.01.2004 N/Qasid 11.07.2008 JC		
200	Waqar Ali	Swabi	10 th	16.01.82	01.11.2003 N/Qasid 11.07.2008 JC		
201	Imdad Ullah	Charsadda	FA	14.01.74	19.11.1998 N/Qasid 11.07.2008 JC		
202	Bakhsh Khan	Peshawar	10 th	12.05.62	27.07.1993 N/Qasid 11.07.2008 JC		

Accepted

Said Karim Shalman
ADVOCATE,
 High Court Peshawar

	NAME	HOME DISTRICT	EDU: QUAL:	DATE OF BIRTH	DATE OF Enlist:	DATE OF Selection Grade	REMARKS
203	Sartaj	Mardan	FA	06.02.78	25.03.2006 Class-IV 11.07.2008 JC		(21)
204	Mian Said Wahid	Swat	FA	04.03.68	19.04.1988 Daftari 11.07.2008 JC		(23)
205	Muhammad Saddique	Swabi	10 th	01.12.81	23.10.2004 N/Qasid 11.07.2008 JC		
206	Raheed ur Rehman	Peshawar	FA	04.02.87	05.04.2005 N/Qasid 11.07.2008 JC		
207	Waseem Shehzad	Abbottabad	10 th	01.01.81	10.05.2005 N/Qasid 11.07.2008 JC		
208	Humayun Khan	Peshawar	10 th	01.12.68	29.03.1988 N/Qasid 11.07.2008 JC		
209	Dilawar	Abbottabad	10 th	01.03.84	13.03.2002 N/Qasid 11.07.2008 JC		
210	Noor Khan	Swat	FA	01.04.86	23.07.2004 N/Qasid 11.07.2008 JC		
211	Sibghat Ullah (1)	Bannu	FA	05.02.81	20.11.1996 N/Qasid 11.07.2008 JC		
212	Abdul Jabbar	DIKhan	10 th	26.06.71	29.09.2003 N/Qasid 11.07.2008 JC		
213	Zia Ullah	Swat	10 th	31.05.76	11.07.2008 JC		
214	Umar Dher (2)	Swat	10 th	05.06.64	11.07.2008 JC		
215	Saif Ullah	Kohat	10 th	23.04.86	11.07.2008 JC		
216	Tanveer Ahmad L	Hazara	10 th	15.03.72	28.06.1989 Daftari 11.07.2008 JC		
217	Mustafa Shah L	DIKhan	BA	16.12.76	02.05.1996 N/Qasid 11.07.2008 JC		
218	Niaz Muhammad L	Bunir	BA	15.04.73	17.10.1995 Daftari 11.07.2008 JC		
219	Muhammad Ilyas-II L	Peshawar	FA	07.02.83	22.09.2005 N/Qasid 11.07.2008 JC		
220	Attig ur Rehman L	Peshawar	10 th	01.02.81	16.03.2005 Class-IV 11.07.2008 JC		
221	Muhammad Riaz L	Abbottabad	10 th	10.05.167	11.07.2008 JC		
222	Maqsood Ahmad L	Mansehra	10 th	05.04.73	1997 N/Qasid 11.07.2008 JC		
223	Zainoor Shah	Nowshera	10 th	06.05.72	19.12.1995 Class-IV 11.07.2008 JC		
224	Gulab Hussain	Kurram Agency	FA	20.03.63	01.02.2000 N/Qasid 11.07.2008 JC		
225	Khawas Khan (3)	Mardan	10 th	03.04.61	15.10.1991 Daftari 11.07.2008 JC		
226	Rashid Khan	Swabi	10 th	05.04.74	20.07.1995 Class-IV 11.07.2008 JC		

Attested
Said Karim Shahman
ADVOCATE,
High Court Peshawar.

S/No	Name	Home Distt:	EDU: QUAN:	DATE OF Birth	DATE OF Enlist:	DATE OF Selection Grade	REMARKS
227	Musarat Shah (4)	Peshawar	10 th	09.01.79	01.06.1999 R/Qasid 11.07.2008 JC		(24)
228	Muhammad Zishan	DIKhan	BA	27.03.96	25.09.2008 JC		(23)
229	Muhammad Tanveer	DIKhan	FA	12.03.89	25.09.2008 JC		
230	Muhammad Nawaz Khan s/o Asnat Khan	Mardan	10 th	22.01.1984	11.06.2009.		
231	Faisal Khan s/o Jihar Khan	Mardan	FA	01.03.99	11.06.2009.		
232	Atta-ur- Rehman s/o Fazle Rehman	Mardan	D.Com	11.04.89	11.06.2009.		
233	Hilal s/o Mir Ahmed	Mardan	FA	01.01.83	11.06.2009.		
234	Syed Atiq-ur-Rehman s/o Sahibzada Habib ur Rehman	Peshawar	FA	24.10.73	11.06.2009.		
235	Jawad Iqbal Khan s/o Jasved Ali Khaki	Peshawar	F.Sc	19.08.87	11.06.2009.		
236	Mufti Sheraz Ahmed s/o Mufti Jan Gul	Peshawar	BA	17.06.84	11.06.2009.		
237	Haji Gul s/o Munaf Gul	Charsadda	FA	03.04.88	11.06.2009.		
238	Muhammad Kamran Khan s/o Abdul Qayyum	Charsadda	FA	01.10.86	11.06.2009.		
239	Sajjad Ahmed s/o Tila Muhammad	Charsadda	FA	06.03.84	11.06.2009.		
240	Mushtaq Muhammad s/o Sultan Muhammad	Charsadda	10 th	01.01.82	11.06.2009.		
241	Numan Zeb s/o Aurangzeb	Nowshera	BA	14.04.85	11.06.2009.		
242	Mian Muhammad Umer s/o Mian Tariq Ahmed	Mardan	F.Sc		11.06.2009.		
243	Haroon s/o Lal Badshah	Mardan	10 th	10.02.1987	11.06.2009.		
244	Inyatullah s/o Zafar ulah	Bannu	10th	05.03.85	11.06.2009.		
245	Qismat Ali s/o Nawab Ali	Bannu	10th	20.03.87	11.06.2009.		
246	Abdul Baqi Jan Khan s/o Sakhi Jan Khan	Lakki Marwat	FA	05.11.1987	11.06.2009.		
247	Imran ullah s/o Gul Marjan	Lakki Marwat	10 th	14.08.1989	11.06.2009.		
248	Aftab Alam s/o Gul Alam	Lakki Marwat	BA	10.08.1976	11.06.2009.		

Attached 30/
 Said Karim
 ADVOCATE
 High Court Peshawar

DPOS

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S/No	Name	Home District	EDV: QUAL:	DATE OF Birth	DATE OF Enlist:	DATE OF Selection Grade	REMARKS
525	Younus Khan s/o Khalil Khan	Peshawar			25.08.2010		-do-
526	Ihsanullah s/o Niamatullah	DIRKhan	16th	01.04.1991	25.08.2010		-do-
527	Tasawar Iqbal s/o Ghulam Rabbani	DIRKhan			25.08.2010		-do-
528	Soif ul Islam s/o Muhammad Amin	Nardan	BZ.	14.04.1985	13.10.2010		

5283 / E
06-07-012

ADDL IGP (S)
Addl: IGP/Headquarters,
For Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar

THE D.P.P.
Diary No. 493
Date: 06/07/12
Swat or Saiduchail

No. 203054-89 E/III, dated Peshawar, the 26 16 /2012.

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

1. Additional IGP/Inv: Khyber Pakhtunkhwa, Peshawar.
2. Addl: IGP/ Special Branch, Khyber Pakhtunkhwa, Peshawar.
3. All Regions: DISG in Khyber Pakhtunkhwa,
4. Capital City Police Officer Peshawar
5. Commandants' FRF & FIC Hangu;
6. DISG Traffic & DCT Khyber Pakhtunkhwa Peshawar.
7. Registrar CPOI
8. Supdts: Establishment & Secret C/O Peshawar.
9. All branches of CPO, Peshawar.
10. PA to IGP Khyber Pakhtunkhwa, Peshawar.

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

No 4087-99 / E.
Dt 06/07 2012.

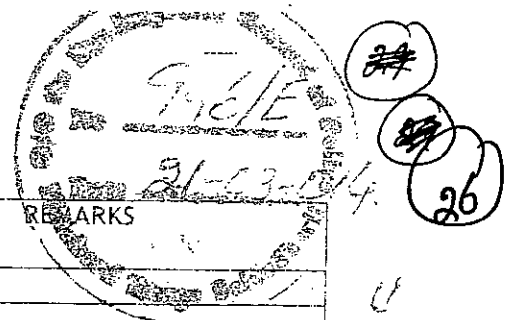
Copy to All DPOS, Sp. Inv, Incharge Inv.
of Malakand Region for imp. work and matter

[Signature]
V D I G M U O

E.C
For Malakand
[Signature]
Deputy Inspector General of Police
Malakand Region, Swat

Attested: [Signature]
Said Karim Shalman
ADVOCATE,
High Court Peshawar.

SENIORITY LIST OF JUNIOR CLERKS (BPS-07) AS IT STOOD ON 31.12.2013



NO. 300 /E-V, The Seniority list of Junior Clerks is published for information of all concerned.

S/No	Name	Home District	EDU: QUAL:	DATE OF BIRTH	DATE OF ENLIST:	DATE OF SELECTION GRADE	REMARKS
1.	Muhammad Jamil	Peshawar	10 th	12.02.59	23.08.82		
2.	Iftikhar Rauf	Peshawar	10 th	25.02.68	06.07.87	16.02.91	
3.	Fazal Rabbi	Peshawar	10 th	01.12.68	01.10.87		
4.	Muhammad Shafiq	Karak	FA	01.05.62	02.11.87		
5.	Abdul Karim	Peshawar	FA	01.05.68	09.04.88		
6.	Ibrar Hussain	Peshawar	10 th	13.08.66	02.05.88		
7.	Attiq -ur- Rehman	Peshawar	10 th	12.08.62	10.03.81	01.07.95	
8.	Liaqat Ali	Nowshera	D.Com	09.01.66	01.08.88		
9.	Amjad Ali Shah	Kohat	B.A	25.04.60	02.08.88	27.10.96	
10.	Muhammad Hameed	Mardan	F.A	12.03.67	06.08.88	27.10.96	
11.	Jan Muhammad	Malakand Agency	BA	03.01.67	15.08.88		
12.	Muhammad Shafi	Peshawar	B.A	10.02.62	15.09.88	16.11.98	
13.	Farman Ali	Peshawar	10	15.08.66	09.10.89	17.12.99	
14.	Amir Khan	Bannu	10 th	10.01.65	09.07.88		
15.	Qasim Jan	Nowshera	10 th	02.06.67	14.07.88		
16.	Ajmal Khan	Peshawar	10 th	01.04.69	06.12.89		
17.	Fazle Khaliq	Chitral	10 th	01.03.66	16.11.89		Converted the punishment of time scaled to lower stage of pay 18784-86/E-III dated: 25.07.2009 by Service Tribunal.
18.	Raja Naeem Iqbal	Abbottabad	10 th	15.04.60	03.05.90		Re-employment in service vide No.25500-3/E-III dated 19.10.2009
19.	Gul Ahmad	Bannu	10 th	11.04.68	29.07.90		
20.	Zikria Khan	Nowshera	10 th	04.05.72	22.09.90		
21.	Syed Tajjamul Shah	Peshawar	10 th	16.10.66	05.03.91		
22.	Raj Malook	Bunir	10 th	01.04.66	09.03.91		
23.	Noor-ul- Arifeen	Bunir	F.Sc	01.04.70	09.03.91		
24.	Ahmad Zeb	Bunir	10 th	21.01.71	09.03.91		
25.	Shehzad Ahmed	Abbottabad	10 th	05.11.66	01.08.91		
26.	Dost Muhammad	Kohat	F.A	05.04.67	20.08.91		
27.	Shah Iran	Nowshera	F.A	01.04.67	20.10.91		
28.	Hadi Hussain	Peshawar	10 th	26.04.68	27.11.91		
29.	Rashid Mehmood	Peshawar	F.A	01.05.72	11.02.92		

Amended
Said Karim
ADVOC
Distt. Clerk

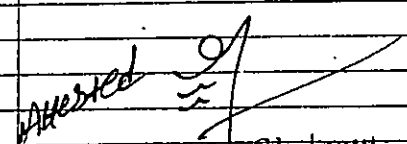
No	Name	Home District	EDU: QUAL:	DATE OF BIRTH	DATE OF ENLIST:	DATE OF SELECTION GRADE	REMARKS
78.	Mustafa Shah	DIKhan	BA	16.12.76	02.05.1996 N/Qasid 11.07.2008 JC		
79.	Niaz Muhammad	Bunir	BA	15.04.73	17.10.1995 Daftari 11.07.2008 JC		
80.	Muhammad Ilyas-II	Peshawar	FA	07.02.83	22.09.2005 N/Qasid 11.07.2008 JC		
81.	Attiq ur Rehman	Peshawar	10 th	01.02.81	16.03.2005 Class-IV 11.07.2008 JC		
82.	Muhammad Riaz	Abbottabad	10 th	10.05.167	11.07.2008 JC		
83.	Maqsood Ahmad	Mansehra	10 th	05.04.73	1997 N/Qasid 11.07.2008 JC		
84.	Zainoor Shah	Nowshera	10 th	06.05.72	19.12.1995 Class-IV 11.07.2008 JC		
85.	Rashid Khan	Swabi	10 th	05.04.74	20.07.1995 Class-IV 11.07.2008 JC		Annexed Said Karim Shahman ADVOCATE, High Court Peshawar
86.	Muhammad Zishan	DIKhan	BA	27.03.86	25.09.2008 JC		
87.	Muhammad Tanveer	DIKhan	FA	12.03.89	25.09.2008 JC		
88.	Babar Khan (sportsman)	Peshawar	BA	01.03.1984	01.04.2009		
89.	Muhammad Riaz Khan (sportsman)	Lakki	10 th		01.04.2009		
90.	Naeem Gul (Sportsman)	Peshawar	FA	31.03.1978	02.04.2009		
91.	Sajid Ali (Sportsman)	Swat	BA	03.03.1979	02.04.2009		
92.	Syed Hashmat Ali Shah (Sportsman)	Peshawar	10 th	01.04.1978	02.04.2009		
93.	Hayatullah (Sportsman)	Peshawar	M.Sc	02.12.1981	02.04.2009		
94.	Syed Waleed Shah	Hangu	BA	14.01.84	22.05.2009		
95.	Muhammad Nawaz Khan	Mardan	10 th	22.01.1984	11.06.2009.		
96.	Faisal Khan	Mardan	FA	01.03.89	11.06.2009.		
97.	Atta-ur- Rehman	Mardan	D.Com	11.04.89	11.06.2009.		
98.	Hilal	Mardan	FA	01.01.83	11.06.2009.		
99.	Syed Atiq-ur-Rehman	Peshawar	FA	24.10.73	11.06.2009.		
100.	Jawad Iqbal Khan	Peshawar	F.Sc	19.08.87	11.06.2009.		
101.	Mufti Sheraz Ahmed	Peshawar	BA	17.06.84	11.06.2009.		
102.	Haji Gul	Charsadda	FA	03.04.88	11.06.2009.		
103.	Muhammad Kamran Khan	Charsadda	FA	01.10.86	11.06.2009.		
104.	Sajjad Ahmed	Charsadda	FA	08.03.84	11.06.2009.		
105.	Mushtaq Muhammad	Charsadda	10 th	01.01.82	11.06.2009.		
106.	Numan Zeb	Nowshera	BA	14.04.85	11.06.2009.		

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	Name	Home District	EDU: QUAL:	DATE OF BIRTH	DATE OF ENLIST:	DATE OF SELECTION GRADE	REMARKS
30.	Shamal Khan	Bannu	10 th	02.09.66	24.03.92		
31.	Rahmatullah	Lakki	10 th	10.10.67	25.08.92		
32.	Saifullah Khan	Lakki	F.A	20.02.73	25.08.92		
33.	Tariq Hayat	Lakki	B.A	05.10.66	23.12.92		
34.	Sakhi Muhammad	Lakki	10 th	10.04.75	23.08.93		
35.	Muhammad Anees	Peshawar	F.A	01.05.70	01.09.93		
36.	Fazle Khuda	Peshawar	10 th	10.11.71	05.09.93		
37.	Jehan Zeb Khan	Charsadda	B.A	02.04.64	16.09.93		
38.	Lal Zada	Swabi	B.A	05.03.75	01.01.94		
39.	Ghulam Mustafa	Mansehra	10 th	28.03.67	28.04.94		
40.	Muhammad Shoaib	Peshawar	10 th	13.04.70	31.07.94		
41.	Tassawar Hussain	Peshawar	D.Com	04.08.76	13.02.95		
42.	Haroon Rashid	Charsadda	F.A	20.04.74	12.04.95		
43.	Azizullah	Lakki	B.A	16.05.69	13.07.95		
44.	Qabool Jan	Peshawar	10 th	16.05.73	04.10.95		
45.	Fakhr -e- Alam	Shangla	10 th	12.04.75	01.11.95		
46.	Dil Jan	Lakki	M.A	18.03.69	08.05.96		
47.	Muhammad Anwar	Lakki	10 th	01.01.74	09.03.97		
48.	Abdul Hanan	Peshawar	B.A	05.08.74	13.01.2000		
49.	Nazir Ahmad	Hazara	10 th	04.04.70	12.11.91 as C-IV 17.10.2001 as JC		
50.	Gul Karim	Charsadda	10 th	29.02.65	10.04.91		Vide Order Endst: No. 22788-91/E-III dated: 14.09.2009
51.	Faisal Khan	Karak	FA	30.07.87	24.03.2005 N/Qasid 10.03.2008 JC		
52.	Iqbal Rizwan	Swat	FA	02.05.77	01.01.1977 N/Qasid 11.07.2008 JC		
53.	Qaisar Khan	Charsadda	10th	14.05.70	13.03.1995 N/Qasid 11.07.2008 JC		
54.	Sher Muhammad	Mardan	10 th	30.04.66	1988 Daftari 11.07.2008		
55.	Muhammad Nazir	Lakki	10 th	01.01.73	20.12.1999 11.07		
56.	Ihsanullah	Lakki	BA	31.03.74	09.00		
57.	Taswar Hussain	Hangu	FA	01.01.82			

Witnessed

Said Karim Shalman
 ADVOCATE,
 High Court Peshawar

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	Name	Home District	EDU: QUAL:	DATE OF BIRTH	DATE OF ENLIST:	DATE OF SELECTION GRADE	REMARKS
58.	Muhammad Ilyas-1 st	Charsadda	10 th	06.04.72	20.12.1995 N/Qasid 11.07.2008 JC		
59.	Abdur Ghafoor	Lakki	BA	22.03.82	09.03.2005 N/Qasid 11.07.2008 JC		
60.	Muhammad Farooq	Dir Lower	FA	05.04.78	15.08.1998 N/Qasid 11.07.2008 JC		
61.	Iftikhar Ali	Mardan	FA	10.02.84	29.04.2006 Class-VI 11.07.2008 JC		
62.	Latif Ahmad Khan	Tank	FA	05.03.84	29.09.2003 N/Qasid 11.07.2008 JC		
63.	Muhammad Afzal	Chitral	FA	07.10.75	30.06.1998 N/Qasid 11.07.2008 JC		
64.	Nazeer Mehdai	Abbottabad	10 th	12.11.68	N/Qasid 11.07.2008 JC		
65.	Shabeer Ahmad	Mansehra	10 th	10.03.81	06.10.2004 N/Qasid 11.07.2008 JC		
66.	Mashkoo Hussain	Kohat	FA	15.11.1985	11.02.2004 Class-IV 11.07.2008 JC		
67.	Saadat Ali	Chitral	FA	05.01.81	01.01.2004 N/Qasid 11.07.2008 JC		
68.	Waqar Ali	Swabi	10 th	16.01.82	01.11.2003 N/Qasid 11.07.2008 JC		
69.	Sartaj	Mardan	FA	06.02.78	25.02.2006 Class-IV 11.07.2008 JC		
70.	Muhammad Saddique	Swabi	10 th	01.12.81	23.10.2004 N/Qasid 11.07.2008 JC		
71.	Raheed ur Rehman	Peshawar	FA	04.02.87	05.04.2005 N/Qasid 11.07.2008 JC		
72.	Waseem Shehzad	Abbottabad	10 th	01.01.81	10.05.2005 N/Qasid 11.07.2008 JC		
73.	Dilawar	Abbottabad	10 th	01.03.84	13.03.2002 N/Qasid 11.07.2008 JC		
74.	Noor Khan	Swat	FA	01.04.86	23.07.2004 N/Qasid 11.07.2008 JC		
75.	Zia Ullah	Swat	10 th	31.05.76	11.07.2008 JC		
76.	Saif Ullah	Kohat	10 th	23.04.86	11.07.2008 JC		
77.	Tanveer Ahmad	Hazara	10 th	15.03.72	28.06.1989 Daftari 11.07.2008 JC		

Approved
Said Karim Shalman
ADVOCATE,
High Court Peshawar

S/No	Name	Home District	EDU: QUAL:	DATE OF BIRTH	DATE OF ENLIST:	DATE OF SELECTION GRADE	REMARKS
566.	Shahzad Ahined	Abbottabad	10 th	23.11.1986	07.08.2013		
567.	Zafar Khan	Abbottabad	FA	15.03.1989	07.08.2013		
568.	Ehtisham Arshad	Abbottabad	FA	07.06.1994	07.08.2013		
569.	Ali Afsar	Mansehra	MA	01.06.1986	07.08.2013		
570.	Muhammad Khalid	Battagram	MA	06.10.1986	07.08.2013		
571.	Ahsan Taskeen ud Din	Kohat	MA	25.02.1986	07.08.2013		
572.	Muhammad Nafees	Kohat	BA	15.01.1987	07.08.2013		
573.	Jehanzeb Khan	Hangu	FA	15.03.1989	07.08.2013		
574.	Farid Ullah	Karak	MA	15.05.1983	07.08.2013		
575.	Malik Niaz Khan	Bannu	MA	12.10.1983	07.08.2013		
576.	Altaf-ur-Rehman	Bannu	MA	03.05.1980	07.08.2013		
577.	Kamran	Lakki	MA	17.02.1987	07.08.2013		
578.	Momin Khan	DIKhan	BA	03.09.1983	07.08.2013		
579.	Muhammad Sibtain Mazhar	DIKhan	10 th	01.04.1992	07.08.2013		
580.	Izat Zaman	Tank	MA	10.11.1986	07.08.2013		
581.	Syed Sobia Bibi	Haripur	BA	15.01.1985	07.08.2013		
582.	Sadaf Bibi	Haripur	F.Sc	12.03.1993	07.08.2013		
583.	Bushra Rani	Abbottabad	BA	16.02.1990	07.08.2013		
584.	Mah Jabeen	Bannu	BA	01.03.1992	07.08.2013		
585.	Muhammad Yasir Khan	DIKhan	FA	04.01.1986	07.08.2013		
586.	Sonia Shaukat Maseeh	Peshawar	FA	25.06.1989	07.08.2013		
587.	Usman Ullah	Peshawar	DAE(Elect)		02.01.2014		

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No 2179-84/15
Date 21/3/14

E.C / ALL DPOs
For n/a action

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

Attested
Said Karim Shalman
ADVOCATE
High Court Peshawar

No. 301-350 E/V, dated Peshawar, the 11/13/2014.

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

1. Additional IGP/Inv: Khyber Pakhtunkhwa, Peshawar.
2. Addl: IGP/ Special Branch, Khyber Pakhtunkhwa, Peshawar
3. Capital City Police Officer Peshawar
4. All Regions DisG in Khyber Pakhtunkhwa,
5. Commandants FRP & PTC Hangu,
6. DisG Traffic & DCT Khyber Pakhtunkhwa Peshawar.
7. Registrar CPO Peshawar.
8. Supdts: Establishment & Secret CPO Peshawar.
9. All Branches of CPO, Peshawar.
10. PA to PPO Khyber Pakhtunkhwa, Peshawar.

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

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Office of the Inspector General of Police
Khyber Pakhtunkhwa, Peshawar.

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

NOTIFICATION

NO. 1093 /CPB,

Promotion as Senior Clerks BPS-14.

Having been recommended by the DFC held on 02-07-2015 and approved by Provincial
Officer, Khyber Pakhtunkhwa, the following Junior Clerks are hereby promoted as Senior
Clerks (BPS-14) with immediate effect:-

S.NO	NAME OF OFFICER	DISTT. OF DOMICILE	PRESENT POSTING
1.	Abdul Karim	Peshawar	CCP Peshawar
2.	Jan Muhammad	Malakand Agency	FRP Headquarters
3.	Raj Malook	Buner	Buner
4.	Shah Iran	Nowshera	Nowshera
5.	Dil Jan	Lakki Marwat	Investigation Lakki Marwat
6.	Gul Karim	Charsadda	CCP Peshawar
7.	Muhammad Ilyas-1st	Charsadda	CCP Peshawar
8.	Muhammad Afzal	Chitral	Chitral
9.	Mashkoo Hussain	Kohat	Investigation Kohat
10.	Safi Ullah	Kohat	Investigation Kohat
11.	Babar Khan	Peshawar	Malik Saad Memorial Sports Trust CPO
12.	Naeem Gul	Peshawar	Sports Section CPO
13.	Muhammad Nawaz Khan	Mardan	Mardan
14.	Hilal	Mardan	CCP Peshawar

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

Sd/-

MIAN MUHAMMAD ASIF
Add: IGP/Headquarters,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

NO. 1094-1116 /CPB dated Peshawar the 31/ 07 /2015

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

- The Add: Inspector General of Police, HQRS: Khyber Pakhtunkhwa, Peshawar.
- The Deputy Inspector General of Police, HQRS: Khyber Pakhtunkhwa, Peshawar.
- The Capital City Police Officer, Peshawar.
- The Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.
- The Regional Police Officers, Mardan, Malakand, Kohat & Baran Regions.
- Assistant Inspector General of Police, Establishment, Khyber Pakhtunkhwa, Peshawar.
- The District Police Officers, Mardan, Buner, Chitral & Nowshera.
- Heads of Investigation, Kohat & Lakki Marwat.
- The Director, Campus Peace Corps, Peshawar.
- The Registrar, CPO, Peshawar.
- The Supdt. Secret, CPO, Peshawar.
- The Supdt. Establishment-V, CPO, Peshawar.
- The Accountant, CPO, Peshawar.
- The Incharge Sports Section, CPO, Peshawar.
- The Incharge, Central Registry Cell, CPO, Peshawar.

Amended
Said Karim Shalman
ADVOCATE,
High Court Peshawar

[Signature]
(SYED BTDA HASSAN SHAIKH)
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

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Office of the Inspector General of Police
Khyber Pakhtunkhwa, Peshawar.

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

NOTIFICATION

No. 1002 /CPB, Promotion as Senior Clerks BPS-14.

Having been recommended by the DPC held on 02-07-2015 and approved by Provincial Police Officer, Khyber Pakhtunkhwa, the following Junior Clerks are hereby promoted as Senior Clerks in (BPS-14) with immediate effect:-

S.NO	NAME OF OFFICER	DISTT: OF DOMICILE	PRESENT POSTING
1.	Atiq-ur-Rehman	Peshawar	Investigation Unit CPO
2.	Farran Ali	Peshawar	CCP Peshawar
3.	Fazal Khaliq	Chitral	DPO Office, Chitral
4.	Muhammad Ibrahim	Charsadda	DPO Office, Charsadda
5.	Sakhi Muhammad	Lakki Marwat	Office of SSP Traffic Peshawar
6.	Qaisar Khan	Charsadda	DPO Office, Charsadda
7.	Sher Muhammad	Mardan	RPO Office, Mardan
8.	Abdul Ghafoor	Lakki Marwat	CCP Peshawar
9.	Muhammad Farooq	Dir Lower	DPO Office, Dir Lower
10.	Latif Ahmad Khan	Tark	RPO Office, D.I.Khan
11.	Dijawar	Abbottabad	RPO Office, Abbottabad
12. ✓	Muhammad Ilyas	Peshawar	CCP Peshawar
13. ✓	Zainoor Shah	Nowshera	FRP Headquarters
14. ✓	Rashid Khan	Swabi	FRP Headquarters
15. ✓	Jawad Iqbal Khaki	Peshawar	CPC Peshawar
16. ✓	Mufti Sheraz Ahmad	Peshawar	CCP Peshawar

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

(MIAN MUHAMMAD ASIF)
Addl: IGP/Headquarters,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. 1003-22 /CPB dated Peshawar the 13/07/2015

- Copy of above is forwarded for information and necessary action to:-
1. The Addl: Inspectors General of Police, HQRS: & Investigation, Khyber Pakhtunkhwa, Peshawar.
 2. The Deputy Inspector General of Police, HQRS: Khyber Pakhtunkhwa, Peshawar.
 3. The Capital City Police Officer, Peshawar.
 4. The Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.
 5. The Regional Police Officers, Mardan, Hazara, Malakand & D.I.Khan Regions.
 6. The District Police Officers, Charsadda, Mardan, Dir Lower, Chitral & D.I.Khan.
 7. The Senior Supdt: of Police, Traffic, Peshawar.
 8. The Director, Campus Peace Corps, Peshawar.
 9. The Registrar, CPO, Peshawar.
 10. The Supdt: Secret, CPO, Peshawar.
 11. The Supdt: Establishment-V, CPO, Peshawar.
 12. The Incharge, Central Registry Cell, CPO, Peshawar.

Said Karim Shalman
ADVOCATE,
High Court Peshawar.



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

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SENIORITY LIST OF JUNIOR CLERKS (BPS-11) AS IT STOOD ON 31.12.2017

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

S.NO	NAME	DATE OF BIRTH	DISTRICT	EDUCATION	DATE OF ENLISTMENT	REMARKS
1.	Shah Zaman	02.09.1968	Kohat	B.A	08.01.1990	Reversion to the lower post as Junior Clerk vide CPO order Endst: No.2125-32/EV dated 31.03.2015
2.	Sardar Ali	15.03.1971	Swat	10th	12.12.1991	Reversion to the lower post as Junior Clerk (BPS-I I) vide DPO Swat OB No. 147 dated 23.08.2016
3.	Samiullah	01.01.1973	Battagram	F.A	22.12.1993	Reversion to the lower post as Junior Clerk vide CPO order Endst: No.4207-13/EV dated 18.11.2014.
4.	Iftikhar Rauf	25.02.1968	Peshawar		06.07.1987	
5.	Ibrar Hussain	13.08.1966	Peshawar	10th	02.05.1988	
6.	Lia at Ali	09.01.1966	Nowshera	D.Com	01.08.1988	
7.	asim Jan	02.06.1967	Nowshera	10th	14.07.1988	
8.	I A•mal Khan	01.04.1969	Peshawar	10th	06.12.1989	
9.	I Zikria Khan	04.05.1972	Nowshera		22.09.1990	
10.	S ed Shah	16.10.1966	Peshawar	10th	05.03.1991	
11.	Noor ul Arifeen	01.04.1970	Buner	BSc	09.03.1991	
12.	Ahmad Zeb	21.01.1971	Buner	B.A	09.03.1991	
13.	Shehzad Ahmed ureshi	05.11.1966	Abbottabad	10th	01.08.1991	
	Dost Muhammad	05.04.1967	Kohat	F.A	20.08.1991	

Superintendent E-V,

AIG/osta

Establishment

Said Karim Shalman
ADVOCATE.
High Court Peshawar

S.NO	NAME	DATE OF BIRTH	DISTRICT	EDUCATION	DATE OF ENLISTMENT	REMARKS
15.	Ikram ul Haq	16.05.1971	Charsadda		14.09.1991	Serving in NACTA Islamabad on Deputation basis for the period of three years w.e.f 04.07.2016. He will re ort back to CPO Peshawar on 03.07.2019
16.	Rashid Mehmood	01.05.1972	Peshawar		11.02.1992	
17.	Shamal Khan	02.09.1966	Lakki	10th	24.03.1992	
18.	Rahmatullah	10.10.1967	Lakki	F.A	25.08.1992	
19.	Saifullah Khan	20.02.1973	Lakki		25.08.1992	
20.	Tari Ha at	05.10.1966	Lakki	B.A	23.12.1992	
21.	Muhammad Anees	01.05.1970	Peshawar		22.08.1993	
22.	Fazle Khuda	10.11.1971	Peshawar	10th	22.08.1993	
23.	Lal Zada	05.03.1975	Swabi		01.01.1994	
24.	Ghulam Mustafa	28.03.1967	Mansehra	10 th	28.04.1994	
25.	Muhammad Shoab	13.04.1970	Peshawar	10 th	31.07.1994	
26.	Tassawar Hussain	04.08.1976	Peshawar	D.Com	13.02.1995	
	Haroon Rashid	20.04.1974	Charsadda	F.A	12.04.1995	
28.	Muhammad Anwar	01.01.1974	Lakki	F.A	09.03.1997	
29.	Nazir Ahmad	04.04.1970	Mansehra	10th	12.11.1991-C-IV 17.10.2001 - c	
30.	Faisal Khan	30.07.1987	Karak	F.A	24.03.2005- NQ 10.03.2008- c	
31.	Iqbal Razwan	02.05.1977	Swat	F.A	26.12.1996-NQ 11.07.2008- JC	
32.	Muhammad Nazir	01.01.1973	Lakki	10th	20.12.1999-NQ 11.07.2008- c	
33.	Ihsanullah	31.03.1974	Lakki	M.A	09.09.1992 Daftari 11.07.2008- Clerk	
34.	Iftikhar Ali	10.02.1984	Mardan	F.A	29.04.2006-C-VI 11.07.2008- c	
35.	Nazeer Mehdi	12.11.1968	Abbottabad	F.A	N/Qasid absorbed as Con 11.07.2008	

Ahmed
Said Karim Shalman
ADVOCATE.
Distt Court Peshawar

36.	Shabeer Ahmad	10.03.1981	Mansehra	10th	05.10.2004-NQ 11.07.2008- c	
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36
35

Superintendent E-v, Superintendent C, Registrar, AIG/Establishment

S.NO	NAME	DATE OF BIRTH	DISTRICT	EDUCATION	DATE OF ENLISTMENT	REMARKS
37.	Saadat Ali	05.01.1981	Chitral	F.A	01.01.2004-NQ 11.07.2008- c	
38.	Waqar Ali	16.01.1982	Swabi	10th	29.10.2003-NQ 11.07.2008- c	
39.	Sartaj	06.02.1978	Mardan	F.A	25.02.2006-C-IV 11.07.2008- JC	
40.	Muhammad Saddique	01.12.1981	Swabi	10th	23.10.2004-NQ 11.07.2008- c	
41.	Raheel ur Rehman	04.02.1987	Peshawar		05.04.2005-NQ 11.07.2008- c	
42.	Noor Khan	01.04.1986	Swat	F.A	23.07.2004-NQ 11.07.2008- JC	
43.	Zia Ullah	31.05.1976	Swat		25.05.2006 Daftari 11.07.2008- JC	
44.	Tanveer Ahmad	15.03.1972	Abbottabad	10th	28.06.1989 Daftari 11.07.2008- Clerk	
45.	Niaz Muhammad	15.04.1973	Bunir	10th	09.10.1995 Daftari 11.07.2008- Clerk	
46.	Attig ur Rehman	01.02.1981	Peshawar	10th	16.03.2005-c-1V 11.07.2008- c	
47.	Muhammad Riaz	10.05.1967	Abbottabad	10th	12.05.1987-NQ 11.07.2008- c	
48.	Maqsood Ahmad	05.04.1973	Mansehra	10th	1997- Naib Qasid 11.07.2008 Clerk	
49.	Muhammad Riaz Khan s orts	28.09.1986	Lakki	B.A	01.04.2009	
50.	Sa'id Ali S ortsman	03.03.1979	Swat	B.A	02.04.2009	

Assessed. 9
Said Karim Shahidi
ADVOCATE.
High Court Peshawar

2

Superintendent CPB,

Registrar,

36

37

51.	Syed Hashmat Ali Shah Sports	01.04.1978	Peshawar	F.A	02.04.2009
52.	Haqatullah Sportsman	02.12.1981	Peshawar		02.04.2009
53.	Faisal Khan	01.05.1989	Mardan	F.A	11.06.2009
54.	Atta ur Rehman	11.04.1989	Mardan	B.A	11.06.2009
55.	Syed Ati ur Rehman	24.10.1973	Peshawar	F.A	11.06.2009

[Signature]
Superintendent
E-v,

[Signature]
Superintendent C

[Signature]
AIG

[Signature]
Establishment.

Assessed
[Signature]
Said Karim Shalman
ADVOCATE,
High Court Peshawar

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[Signature]
Superintendent of Police

[Signature]

[Signature]

v, Superintendent CPB,

Regis

rar,

AIG/Establishment.

[Signature]
(SHER AKBER) PSP, SSI.

Deputy Inspector General of Police, HQs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. /s.c.12— /EV, dated Peshawar, the / /2018.

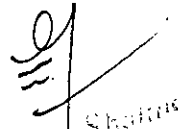
Copy of above is forwarded for information and necessary action to the:-

1. Addl: Inspector General of Police, Investigation, Special Branch, Operation & Elite Force Khyber Pakhtunkhwa.
2. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
3. Commandant, PTC, Hangu.
4. Commandant, CPC, Peshawar.
5. Capital City Police Officer, Peshawar.
6. All Regional Police Officers in Khyber Pakhtunkhwa, Peshawar.
7. Deputy Inspector General of Police, Traffic, CTD, Training, E&I & Telecommunications, Khyber Pakhtunkhwa.
8. Senior Superintendent of Police Traffic, Peshawar.
9. Assistant Inspector General of Police, BDS, Peshawar.

Attested.
[Signature]
Said Karim Shalman
ADVOCATE.
High Court Peshawar.

10. Director, FSL, Khyber Pakhtunkhwa, Peshawar.
11. Director, IT, CPO, Peshawar.
12. All District Police Officers in Khyber Pakhtunkhwa.
13. Deputy Superintendent of Police, PQR.
14. All Branches in CPO, Peshawar.
15. In-charge, Central Registry Cell, CPO, Peshawar.

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

Amer Bed

Said Karim Shaikh
ADVOCATE
High Court Peshawar.

39
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**BEFORE THE WORTHY INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA, PESHAWAR**

Through: PROPER CHANNEL

Subject: APPLICATION FOR PROMOTION AS SENIOR CLERK WITH BACK
BENEFITS AND FIXING OF SENIORITY WITH COLLEAGUES

Respected Sir,

It is submitted that;

- I. Applicant while serving as Naib Qasid at D.P.O, Office, Swat since 23-07-2004 was promoted as Junior Clerk vide CPO, Peshawar No.19085-19100/E-III, dated 11-07-2008.
- II. According to the Seniority List of Junior Clerks issued vide CPO, Peshawar Endst: No.13053-89/E-III, dated 28-06-2012, the name of the applicant was born at Serial No.210, but due to some unknown reasons some juniors from the applicant at Serial Nos.214,225 and 227 were promoted as Officiating Senior Clerks vide CPO, Peshawar No.17477/E-III, dated 22-07-2013 and the name of the applicant was ignored from promotion.
- III. Similarly, according to the Seniority List of Junior Clerks endorsed vide CPO, Peshawar No.301-350/E-V, dated 11-03-2014, the name of the applicant was at Serial No.74 and some juniors/colleagues to the applicant at Serial Nos.76,80,84, 85,88,90,95,98,100 and 101 were promoted as Senior Clerks vide CPO, Peshawar Notification No.1002/CPB, dated 13-07-2015 and the name of the applicant was again ignored from promotion.
- IV. According to the Seniority List of Junior Clerks displayed at Khyber Pakhtunkhwa Police website on internet vide CPO, Peshawar No.1592-1630/E-V, dated 30-03-2018, the name of the applicant is at Serial No.42, but according to the Seniority List of Senior Clerks also displayed at Khyber Pakhtunkhwa Police website on internet vide CPO, Peshawar No.706-60/E-V, dated 31-01-2019, some of most junior colleagues to the applicant in the Seniority List of Junior Clerks as it stood on 31-12-2017 at Serial No.91,94,105,113 and 118 have since been promoted as Senior Clerks and name of the applicant has also been again ignored from promotion as Senior Clerk.

Sir,

The applicant has served entire service with dedication and taking keen interest in official responsibility.

Keeping in view of the above facts, it is humbly requested that the applicant may very kindly be promoted as Senior Clerk with all back benefits with fixing of seniority with colleagues as admissible under the rules, for which the applicant shall ever pray for your long life and prosperity for your this act of kindness.

Amended.
Said Karim
ADVOCATE
High Court Peshawar

Yours Obediently

(Signature)
(NOOR KHAN)
Junior Clerk,
D.P.O, Office, Swat
18/12/2019

40



OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND REGION
SAIDU SHARIF SWAT.

Ph: 0946-9240388 & Fax No. 0946-9240390
Email: ehmalakandregion@gmail.com

No. 10280-81 /E, dated Saidu Sharif the 24 / 09 /2019.

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

Subject: APPLICATION.

Memorandum:

Enclosed kindly find herewith an application submitted by Junior Clerk Noor Khan of Swat District requesting therein for promotion to the rank of Senior Clerk and fixing of seniority, as sent herewith for consideration please.

Encl- (3A)

Regional Police Officer,
Malakand Region, Swat

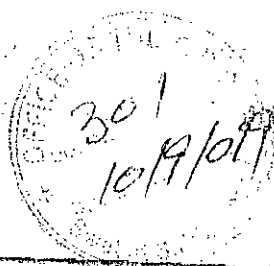
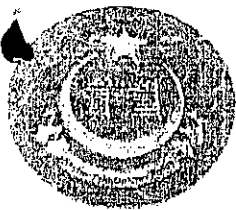
No. 10280-81 /E,

✓ Copy to District Police Officer, Swat for information with reference to his office memo: No. 14129/E, dated 18/09/2019.

Regional Police Officer,
Malakand Region, Swat
"Izhar"

Assesed:

Said Karim Shalman
ADVOCATE,
High Court Peshawar



41

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

No. CPO/CPW/ 301

Dated Peshawar 08 October, 2019

To : The District Police Officer,
Swat.

Subject: APPLICATION

Memo:

An application of Junior Clerk Noor Khan of District Swat received to this office regarding promotion to the rank of Senior Clerk and fixing his seniority vide RPO/Malakaund office Memo: No. 10280-81/E, dated 24.09.2019.

In this regard it is submitted that his case was discussed in the DPC meeting held on 05.07.2013 regarding promotion of Junior Clerks to the rank of Senior Clerks and the applicant was deferred due to incomplete ACRs for the period/years 11.07.2008 to 31.12.2008, 2009, 2010, 2011 and 2012 at Sr. No. 221. His case was again discussed in the DPC meeting held on 02.07.2015 and deferred from promotion to the rank of Senior Clerk due to incomplete ACRs for the period from 01.01.2011 to 30.07.2011, 14.04.2012 to 31.12.2012, 01.01.2013 to 31.12.2013 and 01.01.2014 to 31.12.2014.

Furthermore, a Departmental Promotion Committee meeting regarding promotion of Junior Clerks to the rank of Senior Clerks will be held shortly and the name of Junior Clerk Noor Khan (applicant) exists at Sr. No. 42 in the Seniority List of Junior Clerk issued vide CPO No. 1592-1630/E-V, dated 30.03.2018.

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

8-10-2019

Rec
To inform the applicant
accordingly

Received

Said Karim Shalman
ADVOCATE,
High Court Peshawar.

District Police Officer
SWAT

یہاں البت صبا۔ سرروس میں بیونین ضلع بنجیو جو ا مقام گشتاور



موردہ	05	نومبر	۲۰۱۹	مخانب
مقدمہ		گورخان	بنام	سید کریم شلمان ریڈ وکھٹ کو
دعویٰ				سرروس اپیل
جرم				باعث شکر برائے نگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام گشتاور کیسے سید کریم شلمان ریڈ وکھٹ کو مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موجودہ کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا۔ نیز وکل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر خلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اس پر دستخط کرنے کا اختیار ہوگا۔ نیز یہ صورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکورہ کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔

اگر صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسے اسے ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ دہر جائداد تو ایہ مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہر یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند ہے

المرقم 05 ۰۵ نومبر ۲۰۱۹

امرانٹ ! گورخان ولد شلمان خان سائن عقیدت دار
سید کریم شلمان

السید

Accepted & Accepted

کے لئے منظور ہے

by

بنام گشتاور
Said Karim Shalman
Advocate

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1498/2019

Noor Khan (Junior Clerk/Establishment Clerk) S/O Mashal Khan R/O Aqba
Town Saidu Sharif Swat.

..... Appellant


VERSUS

1. The Inspector General of Police, Khyber Pukhtunkhwa, Peshawar
2. The Regional Police Officer Malakand Region at Saidu Sharif, Swat.
3. The District Police Officer Swat.
4. The Govt: of Khyber Pukhtunkhwa, through Secretary Interior at Peshawar
Secretariat

..... Respondents

INDEX

S.No:	Description of Documents	Annexure	Page
1	Para-wise Comments	-	1-2
2	Affidavit	-	3
3	Authority Letter	-	4
4	DPO Office Order No.147 dated 23/08/2016	"A"	5
5	letter No.CPO/CPB/301 dated 08/10/2019	"B"	6


District Police Officer, Swat
(Respondent No. 3)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Service Appeal No. 1498/2019

Noor Khan (Junior Clerk/Establishment Clerk) S/O Mashal Khan R/O Aqba
Town Saidu Sharif Swat.

..... Appellant

VERSUS

1. The Inspector General of Police, Khyber Pukhtunkhwa, Peshawar
2. The Regional Police Officer Malakand Region at Saidu Sharif, Swat.
3. The District Police Officer Swat.
4. The Govt: of Khyber Pukhtunkhwa, through Secretary Interior at Peshawar
Secretariat

..... Respondents

PARAWISE COMMENTS BY RESPONDENTS

Respectfully Shewith,

PRELIMINARY OBJECTIONS.

1. That the appellant has got no Cause of action and locus standi to file the present appeal.
2. That the appeal is bad due to misjoinder and nonjoinder of necessary parties.
3. That the appeal is barred by Law & limitation.
4. That the appellant has not come to the Tribunal with clean hands.
5. That the instant appeal is not maintainable in its present form.
6. That the appellant has concealed the material facts from this Hon'ble Tribunal.

FACTS:

- 1) Pertains to record, hence needs no comments.
- 2) Correct to the extent that the appellant was involved in a criminal vide FIR No.872 dated 24/12/2013 u/s 419/468/471/477A/473/406/147/149/109 PPC Police Station Bunnr. Appellant was proceeded departmentally by deputing enquiry officer, wherein being found guilty he was recommended for appropriate punishment, hence appellant was awarded punishment of stoppage of promotion for one year vide DPO Office Order No.147 dated 23/08/2016 (Annexure "A").
- 3) Correct to the extent that the appellant was awarded punishment of stoppage of promotion for one year due to his involvement in the above said criminal case, however the punishment awarded to the appellant was commensurate to the guilt he committed.

4) Correct to the extent that Notification No.17477/E-III dated 22/07/2013 and Notification No.1002/CPB dated 13/07/2015 have been issued wherein some Junior Clerks have been promoted to the rank of Senior Clerk, however the ACRs of appellant were missing for the period mentioned in letter No.CPO/CPB/301 dated 08/10/2019 (Annexure "B") issued by the office of worthy IGP KP therefore the appellant's promotion to the rank of senior clerk was differed. Furthermore a criminal case was also registered against the appellant, the brief of which is already explained above.


5) That the appellant has wrongly challenged the legal and valid orders of the respondents before the honorable Tribunal through unsound reasons/grounds.

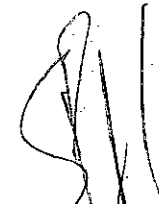
GROUND:

- A. Incorrect. The orders of respondents are legal, lawful and based on facts & justice
- B. First portion of this para pertain to record, however with respect to remaining para the appellant has been treated in accordance with law/rules
- C. Incorrect. The orders of respondents are legal, lawful and in accordance with law/rules.
- D. That the respondents may be allowed to add any other grounds at the time of hearing of appeal.

PRAYER:

Keeping in views the above facts and circumstances, it is humbly prayed that the appeal of appellant being devoid of legal force, may kindly be dismissed with costs.


Inspector General of Police,
Khyber Pukhtunkhwa, Peshawar
(Respondent No. 1)


Regional Police Officer
Malakand Region
(Respondent No. 2),
Malakand Region,
Saidu Sharif, Swat.


District Police Officer Swat
(Respondent No. 3)

Service Appeal No. 1498/2019

Noor Khan (Junior Clerk/Establishment Clerk) S/O Mashal Khan R/O Aqba Town
Saidu Sharif Swat.

..... Appellant


VERSUS


1. The Inspector General of Police, Khyber Pukhtunkhwa, Peshawar
2. The Regional Police Officer Malakand Region at Saidu Sharif, Swat.
3. The District Police Officer Swat.
4. The Govt: of Khyber Pukhtunkhwa, through Secretary Interior at Peshawar
Secretariat

..... Respondents

AFFIDAVIT

We, the above respondents do hereby solemnly affirm on oath and declare that the contents of the appeal are correct/true to the best of our knowledge/ belief and nothing has been kept secret from the honorable Tribunal.


**Inspector General of Police
Khyber Pakhtunkhwa Peshawar
(Respondents No.1)**


**Regional Police Officer
Malakand Region
(Respondents No.2)**

**Regional Police Officer,
Malakand Region,
Saidu Sharif, Swat.**


**District Police Officer, Swat
(Respondents No.3)**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1498/2019

Noor Khan (Junior Clerk/Establishment Clerk) S/O Mashal Khan R/O Aqba
Town Saidu Sharif Swat.

..... Appellant

VERSUS

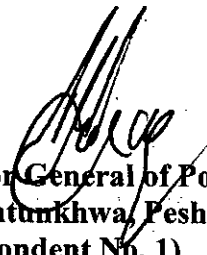
1. The Inspector General of Police, Khyber Pukhtunkhwa, Peshawar
2. The Regional Police Officer Malakand Region at Saidu Sharif, Swat.
3. The District Police Officer Swat.
4. The Govt: of Khyber Pukhtunkhwa, through Secretary Interior at Peshawar
Secretariat


..... Respondents

AUTHORITY LETTER

We, the above respondents do hereby authorized Mr. Naeem Hussain DSP/Legal Swat to appear before the Tribunal on our behalf and submit reply etc in connection with titled Service Appeal.

5


**Inspector General of Police
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 1)**


**Regional Police Officer
Malakand Region
(Respondent No. 2)
Regional Police Office
Malakand Region,
Saidu Sharif, Swat.**


**District Police Officer Swat
(Respondent No. 3)**

Annex-A (5)

ORDER

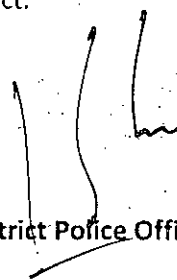
This order will dispose of the departmental enquiry against Junior Clerk Noor Khan while posted as MVE Clerk, Swat (Now this office) was involved in case vide FIR No.872 dated 24/12/2015 u/s 419/468/471/477A/473/406/147/149/109 PPC Police Station Banr.

He was issued Charge Sheet coupled with statement of Allegations and Mr. Saddique Akbar DSP/City, Swat was deputed as Enquiry Officer. The Enquiry Officer conducted proper departmental enquiry against the delinquent official, recorded the statements of all concerned officers, and also perused his Service record. He provided ample opportunity to the delinquent official to defend the charges leveled against him. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings wherein he recommended the delinquent Official for appropriate punishment.

Therefore, in exercise of the powers vested in the undersigned under efficiency & disciplinary Rules 1973 (Amnd: 2011) read with Notification issued vide CPO/Khyber Pakhtunkhwa, Peshawar No.8511-8615/E-V, dated 28-12-2015 I, Muhammad Saleem Marwat, P.S.P, District Police Officer, Swat as a competent authority, am constrained to award him the punishment of Stoppage of Promotion for One Year with immediate effect.

Order announced.

O.B. No. 147
Dated 23/8/2016.

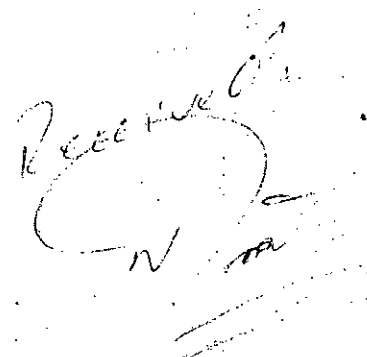

District Police Officer, Swat

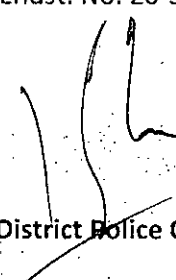
OFFICE OF THE DISTRICT POLICE OFFICER, SWAT.

No 9976-77 E, dated Gulkada the 23/8 /2016.

Copy of above is submitted to the:-

- 1) Worthy Inspector Genera of Police, Khyber Pakhtunkhwa, Peshawar for favour of information please.
- 2) Regional Police Officer, Malakand Region at Saidu Sharif, Swat for favour information with reference to Region Office, Swat Endst: No. 20-31/E, dated 01-01-2016 please.




District Police Officer, Swat



301
10/19/19

Anexur "B"

6

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

No. CPO/CPB/ 301

Dated Peshawar 08 October, 2019

To : The District Police Officer,
Swat.

Subject: APPLICATION

Memo:-

An application of Junior Clerk Noor Khan of District Swat received to this office regarding promotion to the rank of Senior Clerk and fixing his seniority vide RPO/Malakau office Memo: No. 10280-81/E, dated 24.09.2019.

In this regard it is submitted that his case was discussed in the DPC meeting held on 05.07.2013 regarding promotion of Junior Clerks to the rank of Senior Clerks and the applicant was deferred due to incomplete ACRs for the period/years 11.07.2008 to 31.12.2008, 2009, 2010, 2011 and 2012 at Sr. No. 221. His case was again discussed in the DPC meeting held on 02.07.2015 and deferred from promotion to the rank of Senior Clerk due to incomplete ACRs for the period from 01.01.2011 to 30.07.2011, 14.04.2012 to 31.12.2012, 01.01.2013 to 31.12.2013 and 01.01.2014 to 31.12.2014.

Furthermore, a Departmental Promotion Committee meeting regarding promotion of Junior Clerks to the rank of Senior Clerks will be held shortly and the name of Junior Clerk Noor Khan (applicant) exists at Sr. No. 42 in the Seniority List of Junior Clerk issued vide CPO No. 1592-1630/E-V, dated 30.03.2018.

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

8-10

Fee
To inform the applicant
accordingly

Received

Said Karim Shalman
ADVOCATE,
High Court Peshawar.

District Police Officer
SWAT

POLICE DEPARTMENT

DISTRICT SWAT.

FINDING REPORT

ENQUIRY AGAINST JUNIOR CLERK NOOR KHAN MVE CLERK NOW OFFICE OF
W/DPO SWAT.

It is an enquiry initiated against Junior Clerk Noor Khan entrusted to the undersigned for enquiry and report by competent authority vide order No.17/E, dated: 26/01/2016.

ALLEGATIONS:

It is alleged that Junior Clerk Noor Khan while posted as MVE Clerk are involved in case vide FIR No.872 dated 24-12-2015 u/s 419/468/471/477A/473/406/147/149/109 Police Station Bunn.

PROCEDURE:

In this regard the relevant statements were taken (recorded), perused and placed on file for ready reference.

- 1) Statement of Fazal Rahman SI/CIO PS Bunn.
- 2) Statement of alleged Junior Clerk Noor Khan.
- 3) Copy of FIR No.872 dated 24-12-2015 PS Bunn.

FINDINGS:

From perusal of enquiry file/Statements being an enquiry officer I have come to the conclusion that prior to this enquiry a preliminary enquiry was conducted by the then DSP Barikot now DSP HQ and recommended that legal action may be taken against all those officials whose names are mentioned in the said dairy. It is worth mentioning here that in those officials the name of alleged Junior Clerk Noor Khan was also mentioned in that dairy and FIR No.872 dated 24-12-2015 u/s 419/468/471/477A/473/406/147/149/109 Police Station Bunn has been registered against alleged Junior Clerk Noor Khan and his friends. Now the alleged Junior Clerk Noor Khan is on bail and the case is under trail. From perusal of record reveals that the alleged Junior Clerk Noor Khan was involved in such mal practice and this is the reason that FIR has been registered against him.

RECOMMENDATION:

In the light of above discussion I am of the view that the alleged Junior Clerk Noor Khan is recommended for appropriate punishment, if agreed.

Submitted please.

*withholding punishment
For one year
1/1/16
1/1/16*

(Signature)

(SADDQUE AKBAR DSP)
SDPO CITY CIRCLE, SWAT.

16/05/2016.

CHARGE SHEET

I, Muhammad Saleem Marwat P.S.P District Police Officer, Swat, as competent authority, under article 31 of Police order 2002 vide Notification No.8511/E-V, dated 28/12/2015 hereby charge you Junior Clerk Noor Khan MVE Clerk Swat.

That you Junior Clerk Noor Khan while posted as MVE Clerk are involved in case vide FIR No. 872 dated 24/12/2015 u/s 419/468/471/477A/473/406/147/149/10 PPC Police Station Banr.

2. By reason of the above, you appear to be guilty of misconduct under Rule of Khyber Pakhtunkhwa Government Servants Efficiency and Disciplinary Rules 2011 and have rendered yourself liable to all or any of the penalties specified in the Rules ibid.

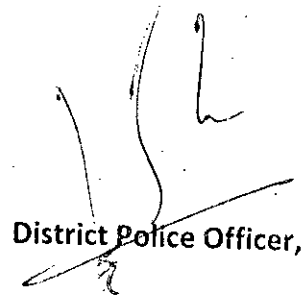
3. You are, therefore, required to submit your written defense within seven days of the receipt of this charge sheet to the Enquiry Committee/Enquiry Officer as the case may be.

4. Your written defense, if any, should reach the Enquiry Officer/Enquiry Committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.

5. Intimate whether you desire to be heard in person.

6. A statement of Allegations is enclosed.

No 17 / E,
Dated 26-1- / 2015


District Police Officer, Swat.

DISCIPLINARY ACTION

I, Muhammad Saleem Marwat, P.S.P. District Police Officer, Swat competent authority, is of the opinion that you, **Junior Clerk Noor Khan** Traffic Clerk ha rendered yourself liable to be proceeded against as you have committed the followi acts/omission with the meaning of Rule 4 of the Khyber Pakhtunkhwa Civil Serva Efficiency and Discipline Rules 2011.

STATEMENT OF ALLEGATIONS

That he Junior Clerk Noor Khan while posted as MVE Clerk is involved case vide FIR No. 872 dated 24/12/2015 u/s 419/468/471/477A/473/406/147/149/1 PPC Police Station Banr.

2. For the purpose of scrutinizing the conduct of the said accused wi reference to the above allegations, an enquiry committee consisting of the following constituted under the Rules.

i. **Mr. Sadiq Akbar Khan SDPO/City Circle, Swat.**

ii. _____

3. The enquiry committee shall, in accordance with the provision of th Ordinance, provide reasonable opportunity of hearing to the accused, record its finding and make within 25 days of the receipt of this order, recommendations as to punishmer or the appropriate action against the accused.

4. The accused and a well conversant representative of departmental shall joi the proceedings on the date, time and place fixed by the enquiry committee.

NO. 17 / E

DATE: 26-1-2016


District Police Officer, Swat

بیانہ ازانہ مفک الرضیہ 5/10/15 مقام بند

ورثہ 24/12/15 ہوا ناواٹیری کا عدالت اور نقلے FIR علیٹ صورت 24/12/15 872
 19, 468, 471, 477A
 473, 147, 148, 149
 11/2

مانہ نثر بریکٹ نفیسی حوالہ ہو کر بعد ملاحظہ پایا گیا کہ ایسے گنہگار ڈائری جو سردار علی ولد محمد انور سائنہ ملا باا منیا پورہ (لاٹیکہ ٹکریٹ) اور خانہ ولد مشتال خانہ بند سیدو شریف (کٹریٹ) فرغانہ علی ولد محمد خالق سائنہ میدو شریف (رائٹ فافہ دھتر M. صاحب) جگہ دیباہ برائٹیوٹ کے نفر ملزمان کے خلاف الزام لگایا گیا کہ بالاباری ایٹکار برائٹیوٹ کے سائنہ لوگوں سے لیے لیٹریڈ رائٹیوٹ کے لائیکہ سولے ہیں۔ ام ڈائری کے برائٹیوٹ DSP عبدالرضی خان نے انکو ڈائری کے بند ناگ رپورٹ کے لیے کہے۔ اور بعد ہند ناگ رپورٹ فریڈ انکو ڈائری کے لیے سرکل برائیوٹ DSP صاحب لیکہ خانہ کو حوالہ کہے۔ صاحب DSP صاحب نے آسنا تفصیلی رپورٹ مرتب نے آفرانے بالاکے حوستے میں ارسال کی۔ جسے بد آفرانے بالانے مقدمہ ٹریٹ کے کہے دیاتے ٹریٹ کے۔ SHO صاحب نے محمد انور خانہ کے ٹریٹ کے رائے صاحب PD صاحب سے حاصل کرے آئے مقدمے میں مقدمہ رجسٹر کے۔ مقدمہ میں ملزمان کے گرفتار ہو کر آنے سے نفیسی کیا گئے۔ اور بعد نفیسی ملزمان جو دستل الاتے جھوٹے۔ مقدمہ میں جملہ ملزمانے ضمانت پر رہا ہو گئے ہیں۔ مثل مقدمہ ایسا ہونے پر ایچ کیا کہ حالات مرتبے کرنے سے لیے ڈسٹیک کرے برائٹیوٹسٹی ایچ نے تمام ملزمانے 9 نفر کے خلاف حالات دینے کے دیاتے کہے۔ مقدمہ میں لاتے مکمل دیا گیا ہے۔ رپورٹ عرف ہے۔

11/2/2016
 11/2/2016
 11/2/2016

فقیہ
 ع

ATTESTED

DSP City

بیان جو نیئر کلرک نور خان متعینہ دفتر MVE سوات حال انچارج کمپلیٹ سیل دفتر DPO صاحب سوات

نے بیان کیا کہ میرے خلاف جو FIR درج رجسٹر ہوا ہے۔ اگر اُس کا بغور ملاحظہ کیا جائے تو اُس سے صاف عیاں ہے کہ من سائل کو کوئی رول نہیں دیا گیا ہے۔ البتہ FIR کے آخر میں یہ ذکر کیا گیا ہے کہ لائنس برانچ کسان کی ملی بھگت سے اے نے MLA کے دستخط شدہ لائنس کاغذات دھوکہ دہی سے خلاف قانون لائنس تیار کر کے رقم وصول کرتا ہے، نہ تو میں نے لائنس تیار کی ہے اور نہ لائنس کے ساتھ میرا کوئی واسطہ رہا ہے۔ میرا تو افسران بالا نے ٹریفک لائنس برانچ کو ٹرانسفر کیا تھا۔ میں نے حکم کی تعمیل کرتے ہوئے حاضری کی۔ حاضری کرنے کے بعد میں نے تین ماہ Long leave منظور کر کے اُس پر باقاعدہ روانگی کی۔ نقل پروانہ لف ہے۔ مزید یہ کہ صفحہ مثل پر میرے خلاف کوئی ایسی شہادت موجود نہیں ہے جس سے یہ ثابت ہو کہ واقعی میں نے پرانے MLA کے دستخط شدہ لائنس کے کاغذات دھوکہ دہی سے خلاف قانون لائنس تیار کی ہے۔ رہی بات FIR رجسٹرڈ ہونے کی تو FIR ایک گنم ڈائیری کے بنیاد پر درج رجسٹرڈ ہوئی ہے۔ گنم ڈائیری پر DSP صاحب بریکوٹ نے انکو ایئری کر کے قانونی کارروائی کی سفارش کی ہے۔ اگر متذکرہ گنم ڈائیری اور انکو ایئری فائنڈنگ رپورٹ کا ملاحظہ کیا جائے تو اُس میں میرے خلاف صرف لکھا ہے کہ من سائل اکرام MVE کے ساتھ ڈیوٹی پر ہے اور پولیس کے لئے ناسور ہے۔ مگر کہیں بھی یہ نہیں لکھا ہے کہ نور خان لائنس تیار کرتا ہے یا لوگوں سے پیسے لیتا ہے۔ FIR میں جو الزام ہے وہ بھی اُس گنم ڈائیری اور DSP بریکوٹ کے فائنڈنگ میں نہیں ہے۔ یہی وجہ ہے کہ عدالت حضور نے من سائل کو ضمانت پر رہا کیا ہے اور جلد ہی مقدمہ Discharge ہونے کا قوی امکان ہے۔ من سائل کے خلاف ایک جھوٹا من گھڑت اور سازشی FIR درج رجسٹرڈ ہوا ہے۔ حالانکہ اس میں باقاعدہ افسران بالا کا دستخطی آرڈرز موجود ہے۔ کہ گنم ڈائیری پر کسی قسم کی کارروائی نہیں کی جائے گی۔ (نقل آرڈرز لف ہیں)۔ میں بے گناہ ہوں اور بد نتیجے پر ملوث کیا گیا ہوں۔ مذکورہ FIR کے اندراج کے نتیجے میں والد ام من سائل کی بے عزتی کو برداشت نہیں کر سکے اور اُس صدمہ کی وجہ سے حرکت قلب بند ہو کر وفات پا چکا ہے۔ (نقل ڈیٹھ سرٹیفیکٹ لف ہے)۔ آخر میں یہ وضاحت کرنا چاہتا ہوں کہ من سائل کے بھائی کا معاملہ ہے اُس کو متعلقہ کمیٹی نے بعد از تحقیقات بھرتی کیا ہے۔ اس سلسلے میں اُس کی تقرری نامہ کا نقل لف بیان ہذا ہے۔ استدعا ہے کہ انکو ایئری ہذا بلا مزید کارروائی داخل دفتر کی جائے۔ تاحیات دُعا گور ہونگا۔

سوات ایئر لائن سڈ کا
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العبد:
جو نیئر کلرک نور خان متعینہ دفتر MVE سوات
حال انچارج کمپلیٹ سیل دفتر DPO صاحب سوات

ATTESTED
DPO

BEFORE THE SERVICES TRIBUNAL KP PESHAWAR
CAMP COURT AT GULKADA DISTRICT SWAT

C.M No. _____-M/2021

in

Appeal No. 1498 /19

Noor KhanAppellant

VERSUS

IGP and others Respondents

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S.#	Description of Documents	Annex:	Pages
1.	Application	-	1-2
2.	Affidavit	-	3
3.	Copy of Additional Documents/ Commendation Certificates	A	4-12

Applicant / Petitioner
Through Counsel


SAID KARIM SHALMAN
Advocate High Court

(1)

BEFORE THE SERVICES TRIBUNAL KP PESHAWAR
CAMP COURT AT GULKADA DISTRICT SWAT

C.M No. _____-M/2021

in
Appeal No. _____/

Noor KhanAppellant

VERSUS

IGP and others Respondents

**APPLICATION FOR PLACING ON FILE ADDITIONAL
DOCUMENTS/ COMMENDATION CERTIFICATES, WHICH IS
JUST AND NECESSARY FOR THE PROPER DISPOSAL OF THE
ABOVE TITLED CASE.**

Respectfully Sheweth:-

1. That the above titled case is pending before this Honorable Court, in which next date of hearing is 08/12/2021
2. That the Applicant/ Appellant wants to place on file the following additional documents;
 - i. Commendation Certificate OB No. 90 Dated: 12/06/2020.
 - ii. Commendation Certificate OB No. 111 Dated: 13/07/2020.
 - iii. Commendation Certificate OB No. 146 Dated: 09/09/2020.
 - iv. Commendation Certificate OB No. 216 Dated: 24/12/2020.

- v. Commendation Certificate RPO No. 472 Dated: 06/05/2021.
- vi. Commendation Certificate No. 77 Dated: 06/05/2021.
- vii. Commendation Certificate OB No. 90 Dated: 01/06/2021.
- viii. Commendation Certificate OB No. 139 Dated: 31/08/2021.
- ix. Commendation Certificate RPO No. 1012/A Dated: 08/09/2021.

(Copy of additional documents/ commendation certificates are attached herewith as annexure "A").

- 3. That the above mentioned documents/ certificate is just and necessary for the proper disposal of the instant service appeal.
- 4. That there is no legal hurdle in placing on file the aforementioned additional documents / commendation certificates.

It is therefore very humbly prayed that on acceptance of this application, the additional documents/ commendation certificates aforementioned may kindly be placed on file.

Applicant / Appellant
Through Counsel

SAID KARIM SHALMAN
Advocate High Court

BEFORE THE SERVICES TRIBUNAL KP PESHAWAR
CAMP COURT AT GULKADA DISTRICT SWAT

C.M No. _____-M/2021

in
Appeal No. _____/

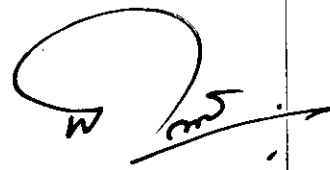
Noor KhanAppellant

VERSUS

IGP and others Respondents

AFFIDAVIT

It is hereby stated on oath that the contents of this accompanying application are true and correct to the best of my knowledge, and nothing has been kept concealed from this Honorable Court.



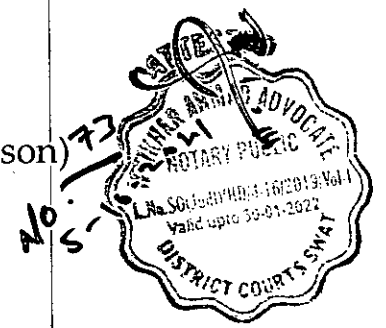
Deponent

Noor Khan

(Appellant in person)

Identified by;

SAID KARIM SHALMAN
Advocate High Court



Swat Pakhtunkhwa Police



5

Commendation Certificate
CLASS III

To PC Noor Khan (DPO Office)

in Recognition of

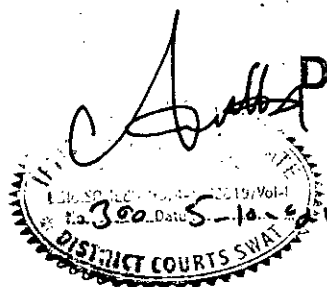
Excellent performance of duty

with cash Reward Rs.1000/-

No OB-111

Date 13-7-20


Qasim Ali Khan, PSP
District Police Officer
Swat



Khyber Pakhtunkhwa Police



Commendation Certificate

CLASS II

Granted by

(ABDUL GHAFQOR AFRIDI) DSP

DEPUTY INSPECTOR GENERAL OF POLICE MALAKAND REGION-III SAIDU SHARIF SWAT.

To Noor Khan "BC"

Son of _____

District Swat

In Recognition of

His Good performance of duty in c/w the proposal of projects of Newly Construction of Buildings along-with approval of sanction strength of Executive & Ministerial Staff.

Cash Reward Rs: 3000/-

No. 472/A,

Date 06/05/2021

[Signature]
300 5-10-21

[Signature]
Deputy Inspector General of Police,
Malakand region-III Saidu Sharif,
Swat

Regional Police Officer,
Malakand at Saidu Sharif, Swat

Hyder Pakhtunkhwa Police

9



Commendation Certificate

CLASS III

To Noor Khan (Pension Clerk) Record Branch

in Recognition of

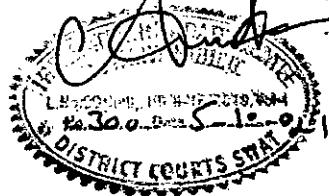
Excellent performance of duty

with cash reward Rs. 500/-

No. DB 010-90

Date 12-06-2020


Qasim Ali Khan, PSP
District Police Officer
Swat



9

Khuzdar Pakhtunkhwa Police



Commendation Certificate

CLASS III

Mr. Noor Khan (Building Clerk)

To _____

in Recognition of

Good Performance of Duty

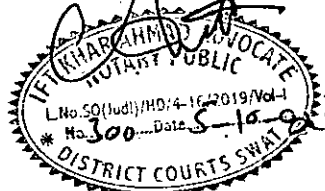
With Cash Reward 2000/-

No. 77

Date 06-05-2021


DILAWAR KHAN BANGASH

District Police Officer
Swat



Khuzdar Pakhtunkhwa Police

10



Commendation Certificate
CLASS III

Noor Khan (Building Clerk)

To _____


in Recognition of

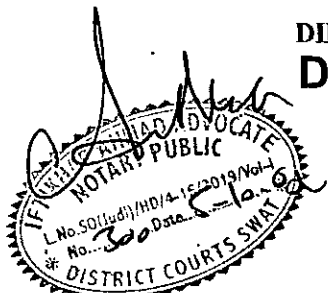
Excellent Performance in Official Duty

With cash Reward Rs.2000/-

No. OB # 90.

Date 01-06-2021


DILAWAR KHAN BANGASH (PSP)
District Police Officer
Swat



Khush Bahadur Pakhtunkhwa Police



11 18

Commendation Certificate
CLASS III

To Noor Khan (Building Clerk)


in Recognition of

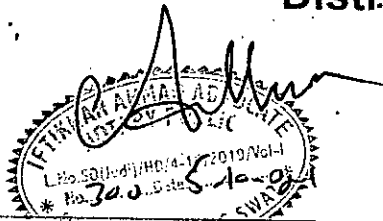
Excellent Performance of Duty

With cash Reward Rs.2000/-

No OB # 139

Date 31-08-2021


DILAWAR KHAN BANGASH (PSP)
District Police Officer
Swat



Hyber Pakhtunkhwa Police



Commendation Certificate

CLASS II

Granted by

(ABDULL GHAFOOR AFRIDI) PSP

DEPUTY INSPECTOR GENERAL OF POLICE MALAKAND REGION-III SAIDU SHARIF SWAT.

To Noor Khan "Building Clerk"

Son of _____

District Swat.

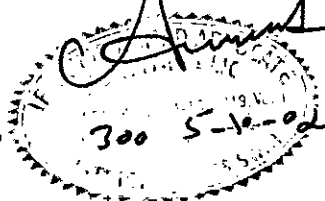
In Recognition of

in c/o their excellent duty during the newly approved Police Head quarter upper Swat, Traffic Hqrs: Two Police Stations including one women police station & Eight Police posts of Swat district.

Call reward to Jany

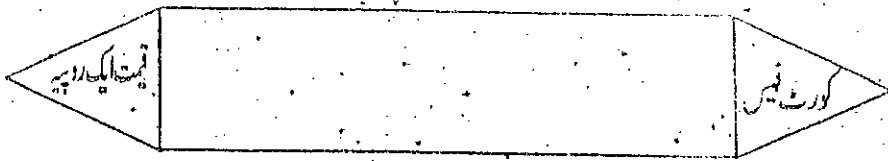
No. 1012/1A

Date 08/09/2021



[Signature]
Deputy Inspector General of Police,
Malakand region-III Saidu Sharif,
Swat.

بعد البت صنف - سرورس کا بیونان ضمیمہ جتنو خوجوا مقام گشتاور



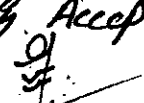
مورخہ 05 نومبر ۲۰۱۹ء پنجاب
 مقدمہ گورخان نام زینسکیر صاحبہ لیکسین وغیرہ
 دعویٰ سرورس اپیل
 جم باعث کمر پر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطہ پیروی وجواب وہی وکل کاروائی متعلقہ آن مقام گشتاور کیسے سید کریم شلمان ریڈ وکسٹیکو کو مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کوراشی نامہ و تقرر البت و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ذگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ اپنی بجائے تقرر کا اختیار ہوگا۔ اگر صاحب مقررہ شدہ کو بھی ہمارے مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برداشت منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ ہر جانب التوا یہ مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہوا یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا اوکالت نامہ لکھ دیا کہ سند ہے

المرقوم 05 باہ نومبر ۲۰۱۹

ایمانت! گورخان ولد شلمان خان سائن عقیدتوں
 سید ورت لکھنوی

والله اعلم بالصواب

Attested & Accepted
 by 
 Said Karim Shalman
 Advocate

"B"

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

No.

Appeal No. 1498 of 20 19

Noor Khan Appellant/Petitioner

14P, 14Pt Pesh. Respondent

Respondent No. 2

Notice to:

Regional Police Officer Malakand
Region (RPO) at Saidu Sharif Swat

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.

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 17th Sep. 20 20

Day of at Camp Court Swat

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.

Appeal No..... 1498 of 20 19

..... Nav Khan Appellant/Petitioner

Versus

..... 16P, 16PK Pesh. Respondent

Respondent No..... 3

Notice to: — Distt. Police Officer (DPO) at GulKada
Saidur Sharif Swat

WHEREAS an appeal/petition under the provision of the North-West Frontier 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..... 7-10-2020 at 8.00 A.M. If you wish to urge anything against the appellent/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..... 17th

Day of..... Sep 20 20

at Camp Court Swat

[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.

"B"

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

165

No.

Appeal No..... 1498 of 20 19

..... Naz Khan Appellant/Petitioner

Versus

..... Govt. of Pk Pesh. Respondent

Respondent No..... 4

Notice to:

Govt. of Pk Pesh through Secy. Home
Peshawar

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..... 1-3-2021 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..... 5.....

Day of..... Feb..... 20 21

at Camp Court Swat

17.02.21

[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.

"B"

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

No.

Appeal No. 1498 of 20 19
Nisar Khan Appellant/Petitioner

14P, KPSC Pesh: Respondent

Respondent No. Govt. of KP through Secy. Interior
Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 7-10-20 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 17th.....

Day of Sep:20 20

at Camp Court Swat

[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.