

06.10.2022

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

Learned counsel for the appellant sought adjournment on the ground that he is proceeding for appearance in cases fixed in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for arguments on 09.11.2022 before the D.B.at Camp Court Swat.



(Rozina Rehman)  
Member (J)  
Camp Court Swat



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

07.07.2022

Nemo for appellant.

Noor Zaman Khattak, learned District Attorney alongwith Ali Rehman SI for respondents present.

Notice be issued to appellant/counsel for 03.08.2022 for arguments before D.B at Camp Court, Swat.



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



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

3.8.22

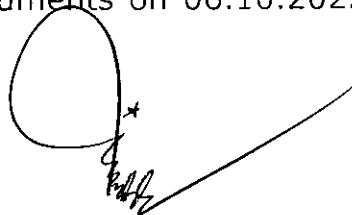
*due to summer vacation the case is adjourned to 8.9.22 for the same.*



08.09.2022

Learned counsel for the appellant present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant was confronted with the directions issued vide order dated 08.06.2022 of this Tribunal and was asked to address his arguments on the same. He requested that as he has not made preparation, therefore, an adjournment may be granted. Last opportunity given. To come up for arguments on 06.10.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)  
Member (Executive)  
Camp Court Swat

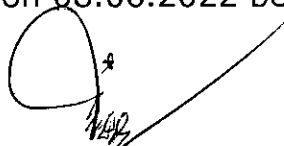


(Salah-Ud-Din)  
Member (Judicial)  
Camp Court Swat


10.05.2022

Clerk of learned counsel for the appellant present. Mr. Ali Rehman, S.I (Legal) alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for arguments on 08.06.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)  
Member (E)  
Camp Court Swat



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

8<sup>th</sup> June, 2022

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

Appellant was confronted with the fact disclosed by him in para-8 in his departmental representation regarding acceptance of seniority appeal bearing No. 1067/2017 decided on 29.01.2018 (as stated in para-8 of departmental representation). He was also asked as to how second appeal for seniority for seniority could be filed especially when vide judgment dated 29.01.2018 in appeal No. 508/2017, the appellant was allowed seniority for the period he remained out of service to which he sought some time to place on file all the commanding documents to assist the Tribunal through his learned counsel. Last opportunity is granted to him to produce the desired documents within a week and to procure attendance of his counsel. To come up for arguments on 07.07.2022 before the D.B at camp court Swat.



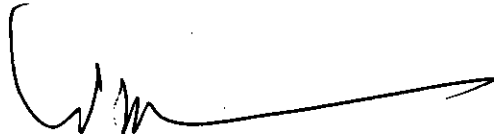
(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

10.12.2021

Junior to counsel for the petitioner present.

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

Former made a request for adjournment as senior counsel for the appellant is busy before Hon'ble Peshawar High Court, Mingora Bench Dar-ul Qaza. Adjourned. To come up for arguments on 03.01.2022 before D.B at Camp Court, Swat.



(Atiq-Ur-Rehman Wazir)  
Member (E)  
Camp Court, Swat

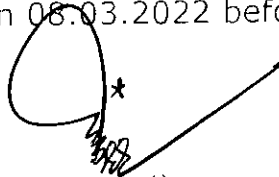


(Rozina Rehman)  
Member (J)  
Camp Court, Swat

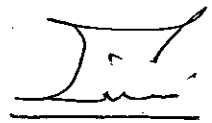
03.01.2022

Appellant present. Mr. Ali Rehman, S.I (Legal) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is out of station today. Adjourned. To come up for arguments on 08.03.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)  
Member (E)  
Camp Court Swat



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

23.08.2021

Nemo for the appellant. Mr. Muhammad Riaz Khan Paindakhel, Asstt.A.G alongwith Khawas Khan, S.I (Legal) for the respondents present.

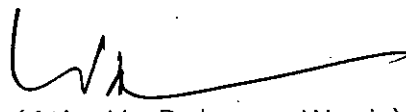
Respondents have furnished reply/comments. Placed on file. The appeal is entrusted to D.B for arguments on 01.11.2021 at Camp Court, Swat.

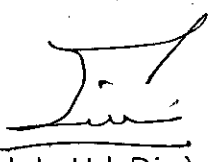
  
Chairman  
Camp Court Swat.

01.11.2021

Appellant alongwith his counsel Mr. Javed Ali, Advocate, present. Mr. Ali Rehman, S.I (Legal) alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Joint request for adjournment was made on the ground that as the execution petition of the appellant has been fixed for 10.12.2021, therefore, the appeal in hand may also be fixed for the said date. Adjourned. To come up for arguments before the D.B on 10.12.2021 at Camp Court Swat.

  
(Atiq-Ur-Rehman Wazir)  
Member (E)  
Camp Court Swat

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

4-1.2020

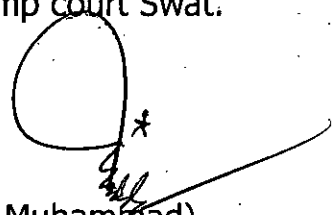
Due to summer vacation, case is adjourned to  
1-3.2021 for the same as before.

  
Reader

01.03.2021

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

Representative of respondents seeks time to submit  
written reply on the next date. Granted. To come up for  
written reply on 03.05.2021 before S.B at camp court Swat.

  
(Mian Muhammad)  
Member(E)  
Camp Court Swat

26.07.2021

To come up for written reply/comments on  
23.08.2021 before S.B at Camp Court, Swat. Notices be  
issued to appellant/counsel as well as respondents for  
the date fixed.

  
Chairman

08.10.2020

Appellant is present in person.

Shed Jehanzeb, Advocate, General Secretary District Bar Association, Swat, by virtue of a reference no. nil dated 07.10.2020 communicated a day before that the Members of District Bar Association, Swat, have been invited to participate in the Oath taking ceremony of the President Peshawar High Court Mingora Bench (Bar Association) PHCMBBA to take place on 08.10.2020 therefore, it was requested for extension of cooperation and adjournment of cases after 10:00 A.M while at the moment prescribed time of 10:00 A.M has already passed. The case is adjourned to 05.11.2020 on which to come up for preliminary hearing before S.B at Camp Court, Swat.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT SWAT

05.11.2020

Appellant in person present. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 04.12.2020 before S.B at Camp Court, Swat.

Appellant Deposited  
Security & Process Fee  
5/11/20

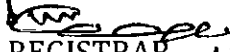
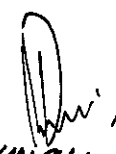

  
(Rozina Rehman)  
Member (J)  
Camp Court, Swat

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 2032 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/03/2020	<p>The appeal of Mr. Hussain Ali resubmitted today by Mr. Muhammad Javed Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR 18/3/2020</p> <p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>07-08-2020</u></p> <p style="text-align: right;"> Chairman</p> <p style="text-align: center;"><i>Due to summer vacation, the case is adjourned. To come up for the same on 08/10/20</i></p> <p style="text-align: right;"> Reader</p>



Resubmitted  
Returned through  
TCS


The appeal of Mr. Hussain Ali son of Farzand Assistant Grade Clerk Police Department Swat received today i.e. on 11.03.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2 One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

Not removed

No. 543 /S.T,

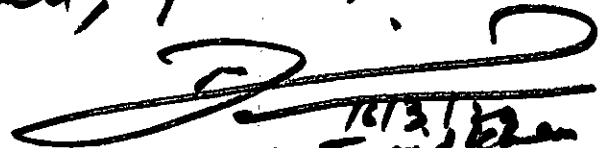
Dt. 11/3 /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Javed Adv. Swat.

Respected Sir,

The file is resubmitted,  
after doing the needful, please.

  
11/3/20  
M. Javed Khan  
ASC

S/Appel files = 1 original  
(6) spare copies.

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

Service Appeal No. 2032 /2020

Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora, Tehsil Babozai District Swat (Assistant Grade Clerk Police Department, Presently at RPO Office, Malakand Region, Saidu Sharif, Swat).....Appellant

**VERSUS**


Provincial Police Officer Government of Khyber Pakhtunkhwa and others  
.....Respondents

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Appellant

Through Counsel

  
**Muhammad Javaid Khan**  
Advocate Supreme Court  
of Pakistan

Office: Allāh-o-Akbar Masjid,  
College Colony, Saidu Sharif, Swat  
Cell: 0343-9607492

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

Service Appeal No. 2032 /2020

Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora,  
Tehsil Babozai District Swat (Assistant Grade Clerk Police  
Department, Presently at RPO Office Saidu Sharif Swat)

.....*Appellant*

**VERSUS**

- 1) Provincial Police Officer Government of Khyber  
Pakhtunkhwa at Central Police Office (CPO) Peshawar
- 2) Assistant Inspector General of Police (Establishment) Khyber  
Pakhtunkhwa at CPO Peshawar
- 3) Deputy Inspector General of Police / Regional Police Officer  
(RPO) Malakand Region at Swat
- 4) Superintendent Establishment -V (CPO) Peshawar
- 5) In-charge Career Planning Branch (CPO) Peshawar

.....*Respondents*

**SERVICE APPEAL UNDER SECTION 4 OF SERVICE**  
**TRIBUNAL ACT READ WITH OTHER RELEVANT**  
**PROVISIONS AGAINST THE IMPUGNED ORDER /**  
**PROMOTION NOTIFICATION NO. 4314-31/E-V,**  
**DATED 17/09/2019 ISSUED BY RESPONDENT NO.1,**  
**TO THE EXTENT THAT THE APPELLANT WAS**  
**NOT PROMOTED AS ASSISTANT GRADE CLERK**

**FROM THE DATE OF ELEGIBILITY WITH ALL  
BACK BENEFITS**

**PRAYER:**

On acceptance of this Service Appeal the impugned order / promotion notification dated 17/09/2019 issued by respondent No. 1 may kindly be rectified / modified to the extent that the appellant may kindly be promoted as Assistant Grade Clerk from the date of eligibility i.e from 23/02/2015 with all back benefits and secondly the appellant may also be given his due seniority in the Seniority List of the Assistant Grade Clerks in the light of the prayed promotion.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favor of appellant against respondents.

**Respectfully Sheweth:**

The appellant submits as under;

1. That the appellant is presently posted as Assistant Grade Clerk in the office of RPO at Saidu Sharif, District Swat.
2. That name of the appellant was at Serial No. 57 in the seniority list of the Senior Clerk BPS-14 in the KPK Province issued on 31/12/2013. (Copy of the seniority list dated: 31/12/2013 of the Senior Clerks BPS-14 is attached herewith as annexure "A").
3. That the appellant while posted at DPO Office Dir Lower was asked willingness vide CPO Peshawar No. 365-74/E-

V, Dated: 13/03/2014 for promotion as Assistant Grade Clerk subject to out posting and the same was submitted accordingly vide DPO, Dir Lower Office Memo No. 6323/EB, Dated: 17/03/2014, but name of the appellant was ignored and appellant colleagues were promoted as Assistant Grade Clerks accordingly.(Copy of DPO Dir Lower office Memo: No.6323, dated 17/03/2014 is attached herewith as Annexure "B").

4. That later on the name of appellant was also included in promotion list vide CPO Peshawar letter No. 179-208/CPB, Dated: 26/01/2015, but appellant was again ignored and appellant colleagues were promoted as Assistant Grade Clerks vide CPO Peshawar No. 394-406/CPB, Dated: 23/02/2015.(Copy of CPO letter No. 179-208/CPB, Dated: 26/01/2015 is attached herewith as Annexure "C").
5. That according to the Annual Confidential Reports (from 01/01/2011 to 31/12/2015) position of Senior Clerks of Khyber Pakhtunkhwa Police appellant colleagues namely Safdar Khan at S/No. 95 and Muhammad Afzal No.177 who have already awarded major punishments are enjoying their own seniority in the seniority list.(Photo copy of ACR position of Senior Clerks of KPK Police is attached herewith as Annexure "D")
6. That the appellant submitted application Dated: 10/05/2017 for keeping his ACR's position on KPK Police website and fixing of his seniority amongst colleagues was forwarded to CPO Peshawar vide DPO Office, Dir

Lower Memo No. 11877/EC, Dated: 10/05/2017, but application in this regard was not entertained at CPO Peshawar. (Copy of application dated 10/05/2017 alongwith Memo: No.11877/EC, dated 10/05/2017 is attached herewith as Annexure "E").

7. That the appellant submitted another application Dated: 10/08/2017 for placing the appellant name at own seniority amongst colleagues in the light of rules / policy of the Government vide DPO, Dir Lower office memo No. 24251/EC, Dated: 10/08/2017, but the appellant request was again dishonored. (Copy of application dated 10/08/2017 alongwith letter No.24251/EC, dated 10/08/2017 is attached herewith as Annexure "F").
8. That in the meanwhile CPO Peshawar vide letter No. 792/CPB, Dated: 13/09/2017 asked for no departmental enquiry certificates in respect of appellant colleagues in connection with promotion as Assistant Grade Clerks, wherein appellant's name was not mentioned in the letter, therefore, the appellant lodged Service Appeal No. 1067/2017 on 25/09/2017 before August Service Tribunal, KPK, Peshawar for fixing of seniority in the Seniority List of Senior Clerks with application for including provisionally name in the letter No. 792/CPB, Dated: 13/09/2017 for further promotion as Assistant Grade Clerk, but appellant's application Dated: 23/09/2017 was also again not entertained at CPO, Peshawar, hence his junior colleagues were promoted as Assistant Grade Clerk vide CPO Peshawar No. -6757/CPB, Dated: 08/11/2017.(Copy of CPO Peshawar No.792/CPB, dated

13/09/2017 and No. 6757/CPB, Dated: 08/11/2017 are attached herewith as Annexure "G").

9. That on 29/01/2018 the August Service Tribunal, Khyber Pakhtunkhwa, Peshawar allowed seniority while deciding the appellant Service Appeal No. 1067/2017, therefore, the appellant submitted application through Region Office, Swat vide Memo: No. 2161/E, Dated: 27/02/2018 for promotion as Assistant Grade Clerk in the light of August Service Tribunal, Khyber Pakhtunkhwa, Peshawar Judgment, but the mentioned application has also not yet been entertained or decided at CPO Peshawar. (Copy of application with letter No.2161/E, dated 27/02/2018 is attached herewith as Annexure "H").
10. That the CPO Peshawar vide order No. 5171-80/E-V, Dated: 01/11/2018 has placed the applicant name at Serial No. 10 in the light of August Service Tribunal, Khyber Pakhtunkhwa, Peshawar judgment, but promotion of appellant as Assistant Grade Clerks and fixing of seniority amongst colleagues with back benefits has not yet been issued due to which the appellant is being affected financially as well as in the seniority list of Assistant Grade Clerk. (Copy of CPO Peshawar order No. 5171-80/E-V, Dated: 01/11/2018 is attached herewith as Annexure "I")
11. That the appellant once again filed another departmental appeal to Respondent No.1 on 09/07/2019, which has not yet been decided. (Copy of the departmental appeal Dated: 09/07/2019 is attached herewith as annexure "J").

12. That the appellant has since been promoted as Assistant Grade Clerk with immediate effect vide Notification No.4313-31/E-V, dated 17/09/2019.( Copy of promotion order is attached herewith as Annexure "K").
13. That the appellant has submitted application dated 27/09/2019 through Region Office, Swat vide No.13237/E, dated 09/12/2019 for promotion as Assistant Grade Clerk from eligibility date with back benefits and fixing of seniority amongst colleagues has not yet been issued by the respondent.(Copy of application dated 27/09/2019 with letter No.1327/E, dated 09/12/2019 is attached herewith as annexure "L").
14. That the appellant being aggrieved from the no response attitude of the Respondents to the request of the appellant for promotion as Assistant Grade Clerk from eligibility date i.e 23/02/2015 and fixation of seniority amongst colleagues with back benefits and no response to the departmental appeal of the appellant Dated: 26/09/2019, this service appeal is filed inter alia on the following grounds.

**GROUND:**

- i) That the impugned order / promotion order is illegal, unlawful, unconstitutional, and based on mala-fide which is very much clear from the record on file.
- ii) That the impugned order / promotion notification has been passed in violation of Section 8 Khyber Pakhtunkhwa Civil Servant Act, 1973 and Rule 17



Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

- iii) That the no response attitude of the Respondents towards the grievance of the appellant illegal, unlawful, unconstitutional and is clear cut violation of the Article 25 of the Constitution of Islamic Republic of Pakistan, 1973, because similarly placed persons have already been promoted (who have been awarded major punishments on different occasions).
- iv) That the impugned order / promotion notification is issued in violation of Article, 9, 10 A, 25 & 27 of the constitution of the Islamic Republic of Pakistan, 1973.
- v) That other grounds not specifically raised will be argued with the permission of this Honorable Court at the time of arguments.

15. That this service appeal is being filed before this Honorable Tribunal, because the respondent No.1 has not decided the departmental appeal of the appellant Dated: 26/09/2019 uptill now, this appeal is bared by few days for which separate condonation application is submitted alongwith this appeal.


It is, therefore, humbly prayed that on acceptance of this Service Appeal the impugned order / promotion notification issued by respondent No.1 may kindly be rectified / modified to the

extent of appellant (for placing his name at his due position in the Seniority List and the appellant may be promoted as Assistant Grade Clerk from the date of eligibility i.e 23/02/2015 with all back benefits and seniority in the Seniority List of the Assistant Grade Clerks may also kindly be fixed with colleagues in the light of rules).

Any other remedy which is just, appropriate and efficacious may also be awarded in favor of the appellant please.



**Appellant**  
Through Counsel



**Muhammad Javaid Khan**  
Advocate Supreme Court  
of Pakistan

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

Service Appeal No. \_\_\_\_\_/2020

Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora, Tehsil Babozai District Swat (Assistant Grade Clerk Police Department, Presently at RPO Office, Malakand Region at Saidu Sharif, Swat)

.....Appellant

**VERSUS**

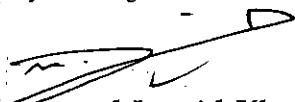
Provincial Police Officer Government of Khyber Pakhtunkhwa and others

..... Respondents

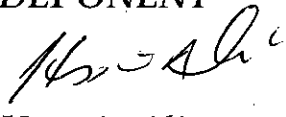
**AFFIDAVIT**

I, Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora, Tehsil Babozai District Swat, do hereby solemnly affirm and declare on oath that all the contents of this Service Appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

Identified by,

  
 Muhammad Javaid Khan  
 Advocate Supreme Court  
 of Pakistan

DEPONENT

  
 Hussain Ali

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

Service Appeal No. \_\_\_\_\_/2020

Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora, Tehsil Babozai District Swat (Assistant Grade Clerk Police Department, Presently at RPO Office Saidu Sharif, Swat) .....Appellant

**VERSUS**

Provincial Police Officer Government of Khyber Pakhtunkhwa and others ..... Respondents

**ADDRESSES OF THE PARTIES**

**ADDRESSES OF THE APPELLANT**

Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora, Tehsil Babozai District Swat (Assistant Grade Clerk Police Department, Presently at RPO office, Malakand Region, Saidu Sharif, Swat)

CNIC: 15602-4028049-1

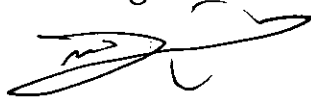
Cell: 0333-9500430

**ADDRESS OF THE RESPONDENTS**

- 1) Provincial Police Officer Government of Khyber Pakhtunkhwa at Central Police Office (CPO) Peshawar
- 2) Assistant Inspector General of Police (Establishment) Khyber Pakhtunkhwa at CPO Peshawar
- 3) Deputy Inspector General of Police / Regional Police Officer (RPO) Malakand Region at Swat
- 4) Superintendent Establishment -V (CPO) Peshawar
- 5) In-charge Career Planning Branch (CPO) Peshawar

  
APPELLANT

Through Counsel

  
Muhammad Javaid Khan  
Advocate Supreme Court  
of Pakistan

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

Service Appeal No. \_\_\_\_\_/2020

Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora, Tehsil Babozai District Swat (Assistant Grade Clerk Police Department, Presently at RPO Office, Malakand Region, Saidu Sharif Swat)

.....Appellant

**VERSUS**

Provincial Police Officer, Government of Khyber Pakhtunkhwa at Central Police Office (CPO) Peshawar and others

.....Respondents

**APPLICATION FOR CONDONATION OF DELAY OF FEW  
DAYS IN FILING THE INSTANT SERVICE APPEAL**

**Respectfully heweth:**

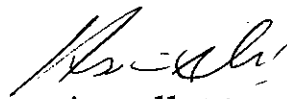
The applicant / appellant submits as under:-

1. That the above Service appeal has been filed before this Hon,ble Tribunal, in which no date of hearing has yet been fixed
2. That the contents of the above mentioned Service Appeal alongwith the contents of the annexure may be considered as an integral part of this application.
3. That there is a few days in filing the instant service appeal, which is not deliberate, but it occurred in collecting the seniority lists and other necessary documents from the concerned offices.

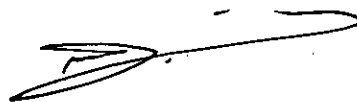
4. That valuable rights of the appellant are involved in the present service appeal.
5. That if the condonation prayed for is not granted then there will be an irreparable loss to the applicant / appellant.

It is therefore, respectfully prayed that on acceptance of this applications an order prayed for may be passed.

Any other remedy which is just, appropriate and efficacious may also be awarded in favor of appellant please.



**Appellant**  
Through Counsel



**Muhammad Javaid Khan**  
**Advocate Supreme Court**  
**of Pakistan**

Office: Allah-o-Akbar Masjid,  
College Colony, Saidu Sharif, swat  
Cell: 0343-9607492

Affidavit:

It is stated on oath that contents of this application are true and correct to the best of my knowledge and belief and noting has been concealed from this Hon'ble court



**Deponent**

(13)

Annex (A)



C.T.C  
M. Fawaid Khan  
A.S.C

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

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

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
1.	Khair Muhammad	Bannu	10 <sup>th</sup>	09.11.54	05.02.76	04.12.86	Promotion forgone for ever vide DIG/Bannu letter No. 2643/ES dated 28.09.98
2.	Qamar Zaman	Bannu	BA	05.02.56	30.9.80	27.3.90	
3.	Akbar Ali	Swat	10 <sup>th</sup>	9.2.63	17.1.82	17.7.90	
4.	Bakhat Afsar	Swat	10 <sup>th</sup>	1.2.58	20.4.81	16.2.91	
5.	Gul Faraz	Mardan	10 <sup>th</sup>	4.10.54	7.4.76	11.7.91	
6.	Muzafar Iqbal	Peshawar	10 <sup>th</sup>	16.02.60	01.08.74 FC 01.05.79 JC	15.10.91	Re-instate in service 31.12.2009
7.	Alam Khan	Swat	BA	2.2.56	1.6.80	01.3.92	
8.	Haibat Khan	Bannu	FA	30.09.63	19.8.82	16.8.92	
9.	Muhammad Yousaf	A. Abad	10 <sup>th</sup>	25.12.62	28.11.83	22.8.93	
10.	Muhammad Saleem	Peshawar	10 <sup>th</sup>	10.09.64	08.11.82	11.12.2012	Assigned revised seniority vide Order No. 19192-93/E-III dated: 06.08.2013
11.	Muhammad Sultan	Mansehra	10 <sup>th</sup>	25.5.55	24.4.77 NQ 14.12.83 JC	22.8.93	
12.	Sania Ullah	Charsadda	BA	11.3.63	18.4.86	25.4.94	
13.	Hidayatullah	Charsadda	F.A	21.10.66	11.01.87	03.01.96	
14.	Zar Badshan	Peshawar	10 <sup>th</sup>	02.11.64	15.02.87	03.01.96	
			BA	10.04.61	09.04.86	10.12.96	

*[Signature]*  
EV  
No. 3-74

61

C.T.C  
M. Jawad Khan  
A.S.C

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
52	Riaz Muhammad	Abbottabad	BA	14.04.63	28.09.89	16.01.2008	
53	Abdul Aziz -II	Mardan	10th	10.02.70	01.06.89	16.01.2008	
54	Khurshid Ahmad	Swat	FA	14.05.56	21.12.80 Class-IV 17.10.89 JC	16.01.2008	
55	Waheed ur Rehman	Abbottabad	D.Com	25.12.68	22.10.89	16.01.2008	
56	Nizakat Khan	Haripur	10th	20.04.69	16.10.89	16.01.2008	
57	Hussain Ali	Swat	FA	08.06.68	05.06.86 Class-IV 31.12.89 JC	16.01.2008	
58	Naseer Ahmad	Peshawar	FA	04.10.65	07.01.90	16.01.2008	
59	Ishtiaq Hussain	Charsadda	10th	20.08.71	10.01.90	16.01.2008	
60	Muhammad Humayun	Charsadda	10th	04.04.65	01.09.89 FC 29.03.90 JC	16.01.2008	
61	Muhammad Ramzan	DIKhan	10th	15.03.69	01.07.90	16.01.2008	
62	Shafaqat Hayat	Kohat	10th	29.12.69	09.07.90	16.01.2008	
63	Haq Nawaz	Mansehra	10th	06.01.59	01.12.81	08.08.2009	
64	Muhammad Aslam	Bannu	10th	18.05.65	06.10.85	02.12.2009	
65	Dildar Hussain	Kohat	10th	20.06.62	10.12.87	05.06.2009	
66	Muhammad Jamshid	Mansehra	10th	20.03.63	18.02.88	05.06.2009	
67	Muhammad Fahim	Mardan	10th	10.03.66	02.03.88	05.06.2009	
68	Amjad	Mansehra	FA	21.04.65	10.03.88	05.06.2009	
69	Muhammad Tayyub	Charsadda	10th	27.03.62	01.01.87	05.06.2009	

*Handwritten signature*  
EV  
11-3-14



(15)

*C.T.C*  
*M. Tawaid Khan*  
*A.S.C*

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

*E.C / ALL DFOs*

*for action*

*No 2173-78 / E*

*dt 21-3-14*

*F.11-13/14*

*Office Supdt:*

*For: Regional Police Officer,  
Malakand, at Saidu Sharif Swak*

No. *264-99* E/V, dated Peshawar, the *17/3* /2014.

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

1. All Add: IsGP in Khyber Pakhtunkhwa
3. Capital City Police Officer Peshawar
5. Commandants PTC Hangu,
7. Office Supdt: Secret CPO

2. All Regions DisG in Khyber Pakhtunkhwa
4. DisG CTD, Traffic & Telecommunication, Khyber Pakhtunkhwa Peshawar
6. Registrar CPO

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

*M. J. S. P.*  
**(MIAN MUHAMMAD ASIF)**  
Add: IGP/Headquarters  
For Provincial Police Officer,  
Khyber Pakhtunkhwa  
Peshawar

*EV*  
*23*  
*11/3/14*

From: The District Police Officer,  
Dir Lower at Timergara

To: The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar

No. 6323 /EB dated Timergara the 17-3- /2014

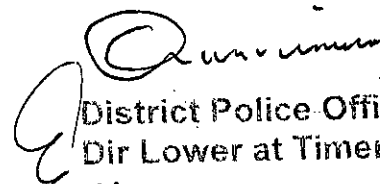
Subject: WILLINGNESS

Memorandum:

Kindly refer to CPO Peshawar signal No.365-74/E-V,  
dated 13/04/2014.

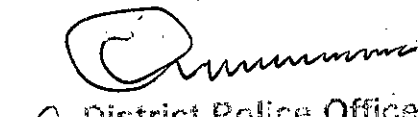
The requisite information is submitted herewith as  
desired please.


Encis:- (01)

  
District Police Officer,  
Dir Lower at Timergara  
17/3

No. 6324 /E.

Copy submitted to Regional Police Officer,  
Malakand at Saidu Sharif, Swat for kind information with reference to  
Region Office, Swat Endst: No.2018-20/E, dated 14/03/2014 please.

  
District Police Officer,  
Dir Lower at Timergara  
17/3

C.T.C  
  
M. Javaid Khan  
Advocate

D

Subject:-

WILLINGNESS

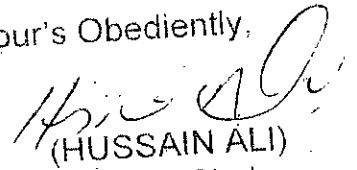
Respected Sir,

With reference to CPO Peshawar signal No.365-74/E-V;

dated 13/03/2014

It is submitted that I am willing for transfer on promotion as Assistant (BPS-14) to Sensitive, Hard and far-flung district / Unit of the Province please.

Your's Obediently,



(HUSSAIN ALI)

Senior Clerk

Office of DPO Dir Lower  
at Timergara

C.T-C

~~M. Jawaid Khan~~  
Advocate

10  
D

Attention S/C Hussain Ali Dir Lower

Police  
FROM:- CEO PESH 131230/100  
TO:- RPOS H2D, MMD, MDI  
DPOS SWAT, CHD  
S&P INYST MDI, D/M, MDI

IN 18-9  
859/E  
14-03-14

NO: 365-74/E-V 213-3-14  
WILLINGNESS OF THE FOLLOWING S/C CLASS OFFICERS  
YOUR REG JUNITIS ARE DUE FOR PROMOTION AS  
OFFICE ASSISTANT (BPS-14) OF PSE PUNJAB  
THEIR WILLINGNESS CERTIFICATE SUBJECT TO  
OUT POSTING BY TODAY THROUGH R/FAR

- S/NO NAME FROM DISTI PRESENT POSITON
- (3) KHURSHID AHMAD SWAT DPO OFFICE SWAT
- (6) HUSSAIN ALI SWAT MDI RANK 53

No 2018-20/E EE DPO SWAT Dir Lower  
Dt 14-3/2014 Formulation

Office Supdt:  
For: Regional Police Officer  
Balakand, at S... Sheriff S...  
13-1510

C.T.C  
Advocate

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

No. 179-208

To:

The Addl: Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawar.  
The Addl: Inspector General of Police, Elite Force, Khyber Pakhtunkhwa, Peshawar.  
The Addl: Inspector General of Police, Investigation, Khyber Pakhtunkhwa, Peshawar.  
The Addl: Inspector General of Police, Operations, Khyber Pakhtunkhwa, Peshawar.  
The Deputy Inspector General of Police, Enquiry & Inspection, Khyber Pakhtunkhwa, Peshawar.  
The Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar.  
The Deputy Inspector General of Police, Telecommunications, Khyber Pakhtunkhwa, Peshawar.  
The Deputy Inspector General of Police, Traffic, Khyber Pakhtunkhwa, Peshawar.  
The Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.  
The Capital City Police Officer, Peshawar.  
The Regional Police Officers, Mardan, Hazara, Malakand, Kohat, Bannu & D.I.Khan.  
The Assistant Inspector General of Police, Legal, CPO, Peshawar.  
The Assistant Inspector General of Police, BDS, Khyber Pakhtunkhwa, Peshawar.  
The Director General, PCU, Khyber Pakhtunkhwa, Peshawar.  
The Director, Campus Peace Corps, Khyber Pakhtunkhwa, Peshawar.  
The Director, FSL, Khyber Pakhtunkhwa, Peshawar.  
The Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.  
The Commandant, Police Training College, Hangu.  
The Senior Supdt: of Police, Traffic, Peshawar.  
The Deputy Supdt: of Police, PQR, Khyber Pakhtunkhwa, Peshawar.  
The Registrar, Central Police Office, Peshawar.  
The Supdt: Secret, Central Police Office, Peshawar.  
The Supdt: Establishment-V, Central Police Office, Peshawar.  
The All Branches in CPO, Peshawar

Subject:

Memo:

**ANNUAL CONFIDENTIAL REPORTS AND NO DEPARTMENTAL ENQUIRY**

Please furnish Annual Confidential Reports and No Departmental Enquiry Certificates in respect of the following Senior Clerks serving in your regions/Units in connection with their promotion as Assistant Grade Clerk within **three (3) days, positively:-**

S.No	Name	Home District	S.No	Name	Home District
1.	Khair Muhammad	Bannu	27.	Attiqullah	Charsadda
2.	Qunmar Zaman	Bannu	28.	Khan Saddiq	Charsadda
3.	Akbar Ali	Swat	29.	Salah-ud-Din	D.I.Khan
4.	Bakht Afsar	Swat	30.	Noor Muhammad	Malakand
5.	Muzafar Iqbal	Peshawar	31.	Taj Muhammad	Mardan
6.	Alam Khan	Swat	32.	Muhammad Zahid	Manshura
7.	Haibat Khan	Bannu	33.	Iltamullah	Charsadda
8.	Muhammad Yousof	Abbottabad	34.	Sajjad Hussain	Peshawar
9.	Muhammad Saleem	Peshawar	35.	Muhammad Zahur	Charsadda
10.	Muhammad Sultan	Manshura	36.	Amir-ur-Rehman	Dir
11.	Sana Ullah	Charsadda	37.	Ubaid-ur-Rehman-I	Chitral
12.	Hidayatullah	Charsadda	38.	Shah Farooq	Kohat
13.	Zur Badshah	Peshawar	39.	Jalal-ud-Din	Malakand Agency
14.	Muhammad Jamshid	Peshawar	40.	Ubaid-ur-Rehman-II	Charsadda
15.	Yar Muhammad	Swat	41.	Gul Nawaz	Bannu
16.	Abdul Wadood	Chitral	42.	Muhammad Pervez-II	Swat
17.	Ali Murad	Chitral	43.	Maqbali Khan	Peshawar
18.	Khan Amir	Peshawar	44.	Ihsanullah	Charsadda
19.	Said Raza	D.I.Khan	45.	Javed Ali	Charsadda
20.	Wajid Gul	Kohat	46.	Inamullah	Bannu
21.	Zahirullah	Charsadda	47.	Abdul Aziz	Swat
22.	Amjid Ali Shah	Peshawar	48.	Muqrab Alam Khan	Mardan
23.	Muhammad Riaz	Peshawar	49.	Abdur Rauf	Lakki
24.	Saleem Akhtar	Haripur	50.	Tahseen Ullah	Charsadda
25.	Shamsher Ali Shah	Mardan	51.	Riaz Muhammad	Abbottabad
26.	Muhammad Naseer	Peshawar	52.	Abdul Aziz-II	Mardan

C.T.C.  
Ado wate

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

53.	Khurshid Ahmad	Swat	93.	Jehanzeb	Peshawar
54.	Waheed-ur-Rehman	Abbottabad	94.	Muhammad Idrees	Charsadda
55.	Nizakat Khan	Haripur	95.	Aslam Khan	Peshawar
56.	Hussain Ali	Swat	96.	Muhammad Khurshid	Abbottabad
57.	Naseer Ahmed	Peshawar	97.	Wajid Ali	Peshawar
58.	Ishtiaq Hussain	Charsadda	98.	Shoukat Ali	D.I.Khan
59.	Muhammad Humayun	Charsadda	99.	Ikram Ullah	D.I.Khan
60.	Muhammad Ramzan	D.I.Khan	100.	Ibad Ali	Peshawar
61.	Shafaqat Hayat	Kohat	101.	Tanvir-ul-Hasnain	D.I.Khan
62.	Haq Nawaz	Mansehra	102.	Basher Ahmed	Nowshera
63.	Muhammad Aslam	Bannu	103.	Jehanzeb	Mardan
64.	Dildar Hussain	Kohat	104.	Nazar Wali	Chitral
65.	Muhammad Jamshid	Mansehra	105.	Muhammad Ali	Buner
66.	Muhammad Fahim	Mardan	106.	Khurshid Khan	Buner
67.	Amjad	Mansehra	107.	Muhammad Ashraf	Buner
68.	Muhammad Tayyub	Charsadda	108.	Daud Shah	Buner
69.	Muhammad Yousaf	Peshawar	109.	Sher Zamin	Buner
70.	Muhammad Ishtiaq	Abbottabad	110.	Amreez Khan	Buner
71.	Sardar Alam	Charsadda	111.	S. Munawar Ali Shah	Peshawar
72.	Sikandar Khan	Kohat	112.	Fazal Wahab	Buner
73.	Zahid Ullah	Peshawar	113.	Tariq Hameed	Abbottabad
74.	Abdul Hakim	Swabi	114.	Ikram Shah	Charsadda
75.	Muhammad Nasir	Kohat	115.	Inam Ullah Jan	Peshawar
76.	Nadeem Ahmed	Mansehra	116.	Sohail Ahmed	Peshawar
77.	Jehanzeb Haideri	Peshawar	117.	Fayaz Khan	Peshawar
78.	Muhammad Riaz	Peshawar	118.	Khalid Mehmood	Haripur
79.	Inayat Ullah	Malakand Agency	119.	Sultan Mehmood	Haripur
80.	Sibghatullah	Bannu	120.	Guldar Alam	Swat
81.	Alanzeb	Mansehra	121.	Sajid Hussain	Abbottabad
82.	Muhammad Bashir	Mansehra	122.	Muhammad Naeem Jan	Peshawar
83.	Muhammad Irshad	Mansehra	123.	Fayaz Ahmed	Charsadda
84.	Farman Ullah	Peshawar	124.	M. Anwar Shah	Kohat
85.	Minhaj-ud-Din	Peshawar	125.	Ashraf Khan	Haripur
86.	Ali Asghar	Nowshera	126.	Akhtar Hussain	Charsadda
87.	Israr Ali	Peshawar	127.	Safdar Khan	Peshawar
88.	Abdul Wadood	Charsadda	128.	Hafeez Ullah	Kohat
89.	Hayat Ullah	Mardan	129.	Hamidullah Jan	Khyber Agency
90.	Murtaza	Mardan	130.	Javed Iqbal	Peshawar
91.	Muhammad Azhar	Swabi			
92.	Rehmat Ullah	D.I.Khan			

Note. Unwilling, will be not accepted in any case.

*[Handwritten signature]*

*[Handwritten signature]*  
(SYED FIDA HASSAN SHAH)  
AIG/Establishment,  
For Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.



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

969/E  
11-3-15

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

**Notification**

No. 393 /CPB, Promotion as Offg: Assistant Grade Clerks: BPS-16.

Having been recommended by the DPC held on 04-02-2015 and approved by Provincial Police Officer, Khyber Pakhtunkhwa, the following Senior Clerks are hereby promoted as Offg: Assistant Grade Clerks: in (BPS-16) with immediate effect:-

S.No	Name of Officer	Distt: of Domicile	S.No	Name of Officer	Distt: of Domicile
1.	Bakht Afsar	Swat	10.	Muhammad Naseer	Peshawar
2.	Muzafar Iqbal	Peshawar	11.	Attiqullah	Charsadda
3.	Muhammad Saleem	Peshawar	12.	Khan Sadiq	Charsadda
4.	Zar Badshah	Peshawar	13.	Salah-ud-Din	D.I.khan
5.	Khan Amir	Peshawar	14.	Muhammad Zahir	Charsadda
6.	Said Raza	D.I.Khan	15.	Amir Rehman	Dir ✓
7.	Wajid Gul	Kohat	16.	Jalal-ud-Din	Malakand ✓ Agency
8.	Amjid Ali Shah	Peshawar	17.	Muhammad Pervez	Swat ✓
9.	Shamsher Ali Shah	Mardan	18.	Maqbali Khan	Peshawar

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

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

No. 394-406 /CPB dated Peshawar the 23 / 02 /2015

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

1. The Addl: Inspectors General of Police, HQRS: Special Branch, Investigation, and Elite Force Khyber Pakhtunkhwa, Peshawar
2. The Deputy Inspector General of Police, HQRS: Khyber Pakhtunkhwa, Peshawar.
3. The Capital City Police Officer, Peshawar.
4. The Deputy Inspector General of Police, Training Khyber Pakhtunkhwa, Peshawar
5. The Dy: Inspectors General of Police, Mardan, Malakand and D.I.Khan Regions.
6. The Registrar, CPO, Peshawar.
7. The Supdt: Secret CPO Peshawar.
8. The Supdt: Establishment -V CPO Peshawar.

C.T.C  
Advocate

Already received

(SYED FIDA HASSAN SHAH)  
AIG/Establishment,  
For Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

(22)  
ACRS POSITION OF SENIOR CLERKS OF KHYBER PAKHTUNKHWA POLICE

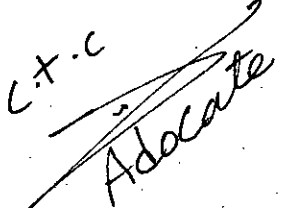
Annex-D

S.No.	Name of Senior Clerk	Date of Birth	Detachable Certificate	ACRs Position					NOT AVAILABLE ACRS
				2011 Available	2012 Available	2013 Available	2014 Available	2015 Available	
1.	Akbar Ali	09.02.1963	NA	01.01.2011 to 30.07.2011	18.06.2012 to 31.12.2012	05.03.2013 to 02.07.2013	2014	2015	01.08.2011 to 31.12.2011 01.01.2012 to 17.06.2012 02.07.2013 to 31.12.2013
2.	Haibat Khan	30.09.1963	NA	01.01.2011 to 13.08.2011	16.04.2012 to 30.08.2012	01.01.2013 to 06.03.2013	N.A	N.A	14.08.2011 to 31.12.2011 01.01.2012 to 16.04.2012 01.09.2012 to 31.12.2012 07.03.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
3.	Muhammad Yousf	06.01.1962	NA	NA	NA	12.08.2013 to 31.12.2013	2014	2015	01.01.2011 to 31.12.2011 01.01.2012 to 31.12.2012 01.01.2013 to 11.08.2013
4.	Sanallah	11.03.1963	-	2011	2012	2013	2014	2015	
5.	Abdul Wadood	09.03.1960	NA	2011 Photocopy	2012 Photocopy	N.A	2014	04.04.2015 to 31.12.2015	01.01.2013 to 31.12.2013 01.01.2015 to 03.04.2015
6.	Ali Murad	04.01.1959	NA	01.07.2011 to 31.12.2011	2012	01.01.2013 to 10.04.2013	2014	2015	01.01.2011 to 31.06.2011 11.04.2013 to 31.12.2013
7.	Zahir Ullah	10.05.1961	-	2011	2012	2013	2014	2015	
8.	Muhammad Riaz	02.07.1963	NA	NA	2012	NA	2014	NA	01.01.2011 to 31.12.2011 01.01.2013 to 31.12.2013 01.01.2015 to 31.12.2015
9.	Taj Muhammad	06.09.1969	-	2011	2012	2013	2014	2015	
10.	Muhammad Jamshed	20.03.1963	NA	2011	2012	2013	NA	NA	01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
11.	Muhammad Zahid	04.04.1968	NA	01.01.2011 to 05.04.2011 30.09.2011 to 31.12.2011	NA	NA	NA	NA	06.04.2011 to 29.09.2011 01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2015 to 31.12.2015
12.	Ilham Ullah	10.02.1963	-	2011	2012	2013	2014	2015	

C.T.C  
Advocate



93.	Ashraf Khan	30.04.1966	NA	NA	10.10.2012 to 31.12.2012	01.01.2013 to 31.03.2013 11.07.2013 to 31.12.2013	2014		01.01.2011 to 31.12.2011 01.01.2012 to 09.10.2012 01.04.2013 to 10.07.2013 01.01.2015 to 31.12.2015
94.	Akhtar Hussain	13.12.1964	-	2011	2012	2013	2014	2015	-
95.	Safdar Khan <u>He is awarded punishment Reduction in Rank</u>	20.04.1969	NA	01.01.2011 to 11.05.2011	NA	NA	2014	NA	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2015 to 31.12.2015
96.	Hafiz Ullah	10.10.1972	NA	2011	2012	2013	01.01.2014 to 06.03.2014 13.03.2014 to 26.06.2014	NA	27.06.2014 to 31.12.2014 01.01.2015 to 31.12.2015
97.	Hameed Ullah Jan	02.02.1968	NA	2011	2012	2013	2014	NA	01.01.2015 to 31.12.2015
98.	Javed Iqbal	11.04.1973	NA	2011	NA	2013	NA	NA	01.01.2012 to 31.12.2012 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
99.	Noor Khan	10.03.1969	NA	2011	NA	2013	2014	NA	01.01.2012 to 31.12.2012 01.01.2015 to 31.12.2015
100.	Shahid Ali	01.04.1972	NA	2011	NA	NA	NA	NA	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
101.	Nadeem Ullah	24.06.1970	NA	2011	NA	NA	2014	NA	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
102.	Khaista Gul	03.01.1967	NA	NA	NA	2013	2014	NA	01.01.2011 to 31.12.2011 01.01.2012 to 31.12.2012 01.01.2015 to 31.12.2015
103.	Sardar Ali	15.03.1971	NA	NA	NA	NA	NA	NA	01.01.2011 to 31.12.2011 01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
104.	Waheed-uz-Zaman	20.02.1971	NA	2011	2012	2013	2014	NA	01.01.2015 to 31.12.2015

C.T.C  
  
 Advocate

167.	Muhammad-Mushtaq	27.06.1968	NA	NA	NA	NA	NA	NA	01.01.2011 to 31.12.2011 01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
168.	Ghulam Mustafa	15.01.197	-	2011	2012	2013	2014	2015	-
169.	Muhammad Arshad	18.12.1980	NA	2011	NA	NA	2014	NA	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
170.	Javed Iqbal	15.02.1971	-	2011	2012	2013	2014	2015	-
171.	Israr Ali	15.04.1978	NA	01.01.2011 to 30.04.2011 08.08.2011 to 01.10.2011	2012	2013	2014	2015	01.05.2011 to 07.08.2011
172.	Saif-ur-Rahman	15.04.1973	NA	2011	NA	NA	NA	NA	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
173.	Ikram Ullah	09.04.1976	-	2011	2012	2013	2014	2015	-
174.	Sarfaraz Khan	15.04.1967	NA	2011	2012	01.11.2013 to 31.12.2013	01.01.2014 to 24.02.2014	2015	01.01.2013 to 30.10.2013 25.02.2014 to 31.12.2014
175.	Faisal Qamar	02.02.1977	NA	2011	2012	2013	2014	01.01.2015 to 31.07.2015	01.08.2015 to 31.12.2015
176.	Rafaqat Ali	28.08.1980	-	2011	2012	2013	2014	2015	-
177.	Muhammad Afzal (Time Scale for 3-years)	01.01.1972	NA	2011	2012	01.01.2013 to 14.06.2013	NA	NA	15.06.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
178.	Muhammad Abid	10.03.1971	-	2011	2012	2013	2014	2015	-
179.	Falak Neaz	12.12.1966	NA	2011	2012	2013	01.01.2014 to 30.06.2014	NA	01.07.2013 to 31.12.2013 01.01.2015 to 31.12.2015
180.	Haqiq-ul-Islam	01.03.1974	NA	2011	NA	NA	NA	NA	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
181.	Kishwar Ali	10.10.1974	NA	2011	2012	01.01.2013 to 16.07.2013	2014	2015	17.07.2013 to 31.12.2013

CT 2  
Adocate

25

1.	Sanction Strength	375
2.	Present Strength	353
3.	Short-fall	22
4.	Completed	68
5.	Incomplete	285

CTC  
Advocate

Amir E

The Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

Through

PROPER CHANNEL

Subject

REPRESENTATION FOR REVISED SENIORITY

Respected Sir,

Kindly refer to CPO Peshawar Memo: No. 464-534/OPS,  
dated 04/05/2017.

It is submitted that:-

- 1. The applicant was absorbed as a Junior Clerk vide CPO Peshawar's order issued over Endst: No.21478-81/E-III, dated 26/12/1989.
- 2. The de-novo departmental proceedings against applicants has since been decided vide Region Office, Swat Endst: No.4295-96/E, dated 04/05/2017.

It is, therefore, humbly requested that the seniority of the applicant as mentioned at S/No.359 in the seniority list of Senior Clerks as stood on 31/12/2016 vide CPO Peshawar Endst: No.706-60/EV, dated 31/01/2017 available on internet of KPK Police website may kindly be re-fixed amongst applicant's colleagues and applicant's ACR position may also be placed at the mentioned website please.

Photo copies of relevant papers are submitted herewith please.

Encls:- (02)

Yours Obediently,

C + C  
Adocate

(HUSSAIN ALI)  
Senior Clerk,  
DPO Office, Dir Lower  
Dated 10/05/2017.

(27)

From: The District Police Officer,  
Dir Lower.

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

No. 11877 /EC, Dated Timergara the, 10/05 /2017.

Subject: REPRESENTATION FOR REVISED SENIORITY

Memorandum:

Kindly refer to CPO Peshawar Memo: No. 464-534/OPS, dated 04/05/2017.

The representation of Senior Clerk Hussain Ali of this office for fixing of his revised seniority as well as placing of his ACR position on KPK Police website along-with connected papers is submitted herewith for consideration please.

Encls:- (03).

District Police Officer,  
Dir Lower.

L.T.C  
Adocate

BEFORE WORTHY PROVINCIAL POLICE OFFICER, KHYBER PAKHTUNKHWA, PESHAWAR

Through: PROPER CHANNEL

Subject REQUEST FOR FIXING OF SENIORITY

Respected Sir,

It is submitted that:-

1. The applicant with colleagues namely Assistant Mushtaq Ahmad (Late), Senior Clerk Khurshid Ahmad and Junior Clerk Mohammad Nawab were issued charge sheets coupled with statements of allegations vide CPO Peshawar Memo: No.10373/E-III, dated 03/05/2012.
2. During departmental proceedings one of applicant colleague namely Junior Clerk Mohammad Nawab was promoted as Senior Clerk vide CPO Peshawar Endst: No.23175-23201/E-III, dated 11/12/2012.
3. According to Seniority list of Senior Clerks issued vide CPO Peshawar Endst; NO.264-99/E-V, Dated.11/03/2014 the name of the applicant was placed at S/NO.57 and was also deferred from promotion due to pending departmental enquiry twice or thrice.
4. The departmental enquiry was decided and the applicant with colleagues were compulsorily retired vide CPO Peshawar order No. 2570-74/E-V, dated. 21/04/2015.
5. The applicant was re-instated in service by August Service Tribunal, Khyber Pakhtunkhwa and CPO Peshawar order No. 3239-46/E-V, dated 30/05/2016 by conducting fresh de-novo departmental enquiry.
6. The denovo departmental proceedings have since been decided by Regional Police Officer, Malakand vide Endst: No.4295-96/E, dated 04/05/2017.
7. The name of applicant was placed at bottom of the seniority list of Senior Clerks vide CPO Peshawar No.706-60/E-V, dated.31/01/2017 with reasons mentioning therein that the applicant is facing denovo departmental proceedings, but name of applicant colleague namely Mohammad Nawab Junior Clerk who was travelling with the applicant in the sail boat was promoted as Senior Clerk during the departmental enquiry proceedings and his name was also placed at his own seniority with not mentioning the mentioned reasons as recorded with applicant name.

C.F.C  
Advocate

Keeping in view of the circumstances explained above, it is humbly requested that applicant name very kindly be placed at applicant own seniority amongst applicant colleagues in the light of rules / policy of the government promulgated in this regard and obliged.

Photo copies of relevant papers are submitted for kind perusal please.

Yours obediently,

*Hussain Ali*  
(HUSSAIN ALI)

Senior Clerk,

DPO Office Dir Lower

Dated 10/08/2017

(29)

OFFICE OF THE  
**DISTRICT POLICE OFFICER**  
DIR LOWER



Ph#.0945-9250005 Fax#. 0945-9250049

E-mail: [dpolowerdir@gmail.com](mailto:dpolowerdir@gmail.com)

No. 24251 /EC, dated 10/08 /2017

To The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar

Subject: **APPLICATION FOR FIXING OF SENIORITY**

Memorandum:

Application of Senior Clerk Hussain Ali of this office along-with relevant papers for fixing of his seniority amongst his colleagues is submitted herewith for consideration under intimation to this office please.

Encls:- ( 17 )

District Police Officer,  
Dir Lower.

e.t.c  
Advocate



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

No. 792 /CPB, dated Peshawar the 13/ 09 / 2017

- To:
- ✓ The Addl: Inspectors General of Police, Special Branch, Elite Force, Investigation and Operations Khyber Pakhtunkhwa, Peshawar.
  - ✓ The Capital City Police Officer, Peshawar.
  - ✓ The Deputy Inspectors General of Police, Enquiry & Inspections, CTD, Traffic and Training, Khyber Pakhtunkhwa, Peshawar.
  - The Regional Police Officers, Mardan, Hazara, Malakand, Kohat, Bannu and D.I. Khan Regions.
  - ✓ The Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.
  - ✓ The Commandant, Police Training College, Hangu.
  - ✓ The Assistant Inspectors General of Police Legal & BDU, Khyber Pakhtunkhwa.
  - ✓ The Director, CPC, Khyber Pakhtunkhwa, Peshawar.
  - ✓ The Director, FSL, Khyber Pakhtunkhwa, Peshawar.
  - ✓ The Budget Officer, CPO Peshawar.
  - ✓ The Deputy Supdt: of Police, PQR, Khyber Pakhtunkhwa, Peshawar.
  - ✓ All Branches in CPO, Peshawar.

Subject:  
Memo:

**NO DEPARTMENTAL ENQUIRY CERTIFICATE**

Please furnish fresh No Departmental Enquiry Certificates in respect of the following Senior Clerks serving in your regions/Units in connection with their promotion as Assistant Grade Clerks immediately:-

S.NO	NAME	S.NO	NAME
1.	Muhammad Iqbal	21.	Abdur Rauf
2.	Akbar Ali	22.	Tehseenullah
3.	Halbat Khan	23.	Nadeem Ahmed
4.	Muhammad Yousef	24.	Riaz Muhammad
5.	Sannaullah	25.	Waheed ur Rehman
6.	Ali Muneed	26.	Nizakat Khan
7.	Zahirullah	27.	Naseer Ahmad
8.	Muhammad Riaz	28.	Ishtiaq Hussain
9.	Taj Muhammad	29.	Muhammad Hamayun
10.	Muhammad Jamehid	30.	Muhammad Ramzan
11.	Muhammad Zahid	31.	Shafaqat Hayat
12.	Iltamullah	32.	Haq Nawaz
13.	Sajjad Hussain	33.	Muhammad Javed
14.	Shah Farooq	34.	Muhammad Aslam
15.	Ihtanullah	35.	Dildar Hussain
16.	Javed Ali	36.	Muhammad Fahim
17.	Inamullah	37.	Anjad
18.	Abdul Aziz	38.	Muhammad Tayyub
19.	Sajjad Anwar	39.	Muhammad Yousef
20.	Muqarrab Alam	40.	Muhammad Ishtiaq

C.T.C  
Advocate



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

No. 792 /CPB, dated Peshawar the 13/ 09 /2017



S.NO	NAME	S.NO	NAME
41.	Sardar Alam	51.	Muhaminad Irahad
42.	Sikandar Khan	52.	Fermanullah
43.	Zahidullah	53.	Minhah ud Din
44.	Abdul Hakim	54.	All Asghar
45.	Muhaminad Nasir	55.	Israr Ali
46.	Muhammad Riaz	56.	Abdul Wadood
47.	Inayatullah	57.	Hayer Ullah
48.	Sibghatullah	58.	Murtaza
49.	Alainzeb	59.	Muhaminad Azhar
50.	Muhammad Bashir	60.	Rehmat Ullah

*(Signature)*  
(AIRIF SHAHBAZ KHAN) PSP  
AIG/Establishment  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.  
13/9/2017

Endst: No. and dated even  
Copy forwarded to the:-

1. Addl: Inspector General of Police, Headquarters, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQrs., Khyber Pakhtunkhwa, Peshawar.
3. PSO to Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
4. Registrar, CPO, Peshawar.
5. Supdt: Secret. CPO Peshawar to provide synopsis of the above named Senior Clerks to Career Planning Branch CPO.
6. Supdt: Establishment-V, CPO, Peshawar.

BY FAX

No. 8480-91/E  
Date 14-09-2017

ECI All DPOs + All S.P. Inv.

Fresh No. departmental Enquiry Certificate in respect of Senior Clerks of your respective district/unit in connection with their promotion as Asstt. Grade Clerk may be furnished at the earliest please

C.T.C  
*(Signature)*  
Advocate

EC

*(Signature)*  
Regional Police Officer,  
Malkhan, Peshawar, Swat.  
14/9/2017

District Police Officer,  
Dir Lower at Timergara.

(32)



45

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE  
PESHAWAR  
Ph: 091-9210545 Fax: 091-9210927  
E-Mail: - DSEstabV@gmail.com

6757-80/E-V

Dated, Peshawar the 8-11 Nov, 2017

ORDER.

On promotion the following transfer/posting amongst the Assistant Grade Clerks (BPS-16) as noted against their names are hereby ordered with immediate effect:-

No	Name	FROM	TO
1.	Mr. Muhammad Yousaf	RPO office Hazara	RPO office Hazara
2.	Mr. Sana Ullah	Special Branch, KPK Peshawar	Special Branch, KPK Peshawar
3.	Mr. Zahir Ullah	CCPO office Peshawar	CCPO office, Peshawar.
4.	Mr. Taj Muhammad	Invest. Wing, Nowshetra	Invest. Wing, Nowshetra.
5.	Mr. Muhammad Jamshed	DPO office Mansetra	DPO office Mansetra.
6.	Mr. Iham Ullah	DPO office Charsadda	DPO office Charsadda
7.	Mr. Naimat Ullah	CTD, KPK Peshawar	Sp. Branch KPK, Peshawar.
8.	Mr. Sajjad Hussain	CCP Office Peshawar	CTD KPK, Peshawar.
9.	Mr. Ihsan Ullah	CPO, Peshawar	CPO, Peshawar.
10.	Mr. Javed Ali	DPO office Charsadda	Operations Branch, CPO Peshawar.
11.	Mr. Inam Ullah	FRP/Hazara Range	FRP/ Hazara Range.
12.	Mr. Sajjad Anwar	DPO office Kohat	Traffic, School Kohat (He will draw pay from PTC Hangu)
13.	Mr. Muqarrab Alam Khan	RPO/Mardan	PDRM, Mardan
14.	Mr. Abdur Rauf	CCPO office Peshawar	CCPO office Peshawar
15.	Mr. Tehseen Ullah	CPO, Peshawar	SP/FRP Peshawar Range.
16.	Mr. Nadeem Ahmad	CPO, Peshawar	CPO, Peshawar.
17.	Mr. Riaz Muhammad	FRP/Hazara Range	FRP/Hazara Range
18.	Mr. Nizakat Khan	RPO office Hazara	RPO office Hazara.
19.	Mr. Naseer Ahmad	SSP/Traffic office, Peshawar	SSP/Traffic office, Peshawar
20.	Mr. Ishfaq Hussain	DPO office Charsadda	RPO office Mardan.

C.T.C  
Advocate

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Sd/-  
Addl: IGP/HQrs:  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

- Inspector General of Police HQs: Khyber Pakhtunkhwa, Peshawar.
- Accountant General Khyber Pakhtunkhwa.
- Comenadant PTC Hangu.
- Deputy Inspector General of Police HQs: Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspectors General of Police, Special Branch, CID, and Operations Khyber Pakhtunkhwa, Peshawar.
- Regional Police Officers, Hazara & Mardan.
- Capital City Police Officer, Peshawar.
- District Police Officers, Mansehra, Charsadda, and Kohat.
- Assistant Inspector General of Police Estt: CPO Peshawar.
- SP/Inv: Wing, Nowshera.
- SP/FRP Hazara Range.
- SP/FRP Peshawar Range.
- District Accounts Officers, Abbottbad, Mansehra, Nowshera, Charsadda, Kohat, & Mardan.
- Director Police School of Public Disorder and Riot Management, Mardan.
- Registrar CPO Peshawar.
- Office Supdtt: Secret Branch, CPO Peshawar.
- Accountant, CPO Peshawar.
- Office Supdtt: Central Registry Coll CPO, Peshawar.

C.T.C  
Advocate

(ANP Shabbir Khan) PSP  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

2/11/17

34

Annea H<sup>r</sup>

BEFORE WORTHY PROVINCIAL POLICE OFFICER, KHYBER PAKHTUNKHWA,  
PESHAWAR

Through: PROPER CHANNEL

Subject: APPLICATION FOR PROMOTION AS ASSISTANT IN LIGHT OF COURT JUDGMENT

Respected Sir,

It is submitted that August Service Tribunal, Khyber Pakhtunkhwa while on 29/01/2018 deciding the Service Appeals No.508/2017 and 1067/2017 filed by the applicant, has granted all back benefits including allowing seniority of the said periods.

The applicant colleagues as well as junior have already been promoted as Assistant Grade Clerks during the mentioned periods. The Annual Confidential Reports of the applicant are already complete and in the entire service for more than 30 years rendered by the applicant has not yet been conveyed any adverse report(s).

It is, therefore, humbly requested that the applicant may kindly not be further deprived from legal rights and may very kindly be promoted as Assistant Grade Clerk with assigning and fixing of seniority amongst colleagues with back benefits in the light of August Service Tribunal judgment for which the applicant shall ever pray for your long life and prosperity for your this act of kindness and obliged.

Photo copies of judgment of August Service Tribunal, Khyber Pakhtunkhwa are submitted herewith for perusal please.

Yours Obediently.

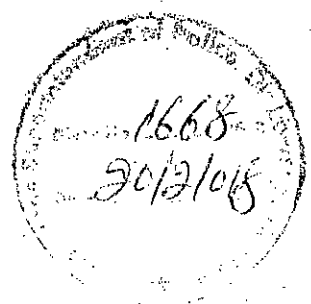
*Hussain Ali*

(HUSSAIN ALI)

Senior Clerk,

DPO Office, Dir Lower

Dated 20/02/2018



C.T.C  
*Advocate*

*EC*

*S. Khan*

District Police Officer  
Dir Lower at Timergara

33

OFFICE OF THE  
**DISTRICT POLICE OFFICER**  
DIR LOWER



Ph#.0945-9250005 Fax#: 0945-9250049

E-mail: [dpolowerdir@gmail.com](mailto:dpolowerdir@gmail.com)

No. 5790 /EC, dated 20/2/2018

To: The Regional Police Officer,  
Malakand at Saidu Sharif, Swat

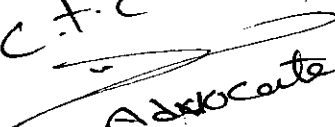
Subject: **APPLICATION**

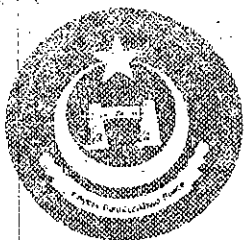
Memorandum:

Application along-with photo copies of judgments of August Service Tribunal, Khyber Pakhtunkhwa of Senior Clerk Hussain Ali of this office requesting therein for promotion as Assistant Grade Clerk and fixing of seniority amongst colleagues is forwarded herewith for onward submission to CPO Peshawar for consideration under intimation to this office please.

Encls:- ( 06 )

  
District Police Officer,  
Dir Lower

C.T.C  
  
Advocate



OFFICE OF THE  
REGIONAL POLICE OFFICER, MALAKAND  
AT SAIDU SHARIF SWAT.  
Ph: 0946-9240381-83 & Fax No. 0946-9240390  
Email: digmalakand@yahoo.com

No. \_\_\_\_\_ /E, dated Saidu Sharif the 27 / 02 / 2018

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

22/2  
8/3/08

Subject: APPLICATION.

Memorandum:

The District Police Officer, Dir Lower vide his office memo No. 5790/EC, dated 20/02/2018 has forwarded an application (alongwith judgment of August Service Tribunal, Khyber Pakhtunkhwa Peshawar) submitted by Senior Clerk Hussain Ali requesting therein for promotion as Assistant Grade Clerk and fixing of seniority amongst his colleagues.

His application alongwith relevant papers is submitted herewith for necessary action.

Regional Police Officer,  
Malakand, at Saidu Sharif Swat

No. 2162 /E,

Copy for information to the District Police Officer, Dir Lower with reference to his office memo No. quoted above.

Regional Police Officer,  
Malakand, at Saidu Sharif Swat

*[Handwritten signature]*  
20/02

C.T.C

Advocate

EC

*[Handwritten signature]*

District Police Officer,  
Dir Lower at Timergara

7/3

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

Ph: 091-9210545 Fax: 091-9210927 Email: OSEstabV@gmail.com

NO. 5170-80/E-V, dated 11.2018

**OFFICE ORDER.**

In compliance with the judgment dated 29.01.2018 of Honorable Service Tribunal Camp Court Swat vide Service Appeal No. 1067/2017, revised Seniority is hereby assigned to Mr. Hussain Ali Senior Clerk of Malakand Region, conditionally and provisionally subject to the outcome of CPLA and his name was placed at Serial No.10, below the name of his colleague Waheed-ur-Rehman and above name of Muhammad Humayun in the Seniority list of Senior Clerk.

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

**Endst: No. & date even.**

Copy forwarded to the: -

1. Addl: Inspector General of Police, HQrs, CPO Peshawar.
2. Deputy Inspector General of Police, HQrs, CPO Peshawar.
3. Regional Police Officer, Malakand.
4. District Police Officer, Dir Lower w/r to his office letter No. 34692/EB, dated 15.10.2018 for onward submission to the Honorable Court.
5. Assistant Inspector General of Police: Legal CPO Peshawar
6. Registrar CPO. Peshawar.
7. PA to the Assistant Inspector General of Police: Estt: CPO Peshawar.
8. Office Superintendent: Secret, CP Branch & Central Registry Cell CPO, Peshawar.

C + C  
Advocate

EC / BA (4)  
For Malakand  
Office of pdr  
For: Regional Police Officer,  
Malakand, at Saidu Sharif Swat

Already received vide  
Dy No 7710 dt. 2-11-18

To, The worthy Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

Through PROPER CHANNEL

Subject: APPLICATION FOR PROMOTION AS ASSISTANT GRADE CLERK WITH BACK BENEFITS

Respected Sir,

It is submitted that:-

1. The name of applicant was at S/No.57 in the seniority list of Senior Clerks as stood on 31/12/2013 circulated vide CPO Peshawar Endst: No.264-99/E-V, dated 11/03/2014.
2. The applicant while posted at DPO Office Dir Lower was asked willingness vide CPO Peshawar No.365-74/E-V, dated 13/03/2014 for promotion as Assistant Grade Clerk subject to out posting and the same was submitted accordingly vide DPO, Dir Lower Office Memo No.6323/EB, dated 17/03/2014, but name of the applicant was ignored and applicant colleagues were promoted as Assistant Grade Clerks accordingly.
3. Later-on the name of applicant was also included in promotion list vide CPO Peshawar letter No.179-208/CPB, dated 26/01/2015 but applicant was also ignored and applicant colleagues were promoted as Assistant Grade Clerks vide CPO Peshawar No.394-406/CPB, dated 23/02/2015.
4. According to the seniority list of Senior Clerks of Khyber Pakhtunkhwa Police some colleagues of the applicant have already awarded major punishments are enjoying their own seniority in the seniority list.
5. The applicant submitted application dated 10/05/2017 for keeping his ACR's position on KPK Police website and fixing of his seniority amongst colleagues was forwarded to CPO:Peshawar vide DPO Office, Dir Lower Memo:

C.T.C  
~~Advocate~~

FC  
 Faruq  
 27/8/19



No.11877/EC, dated 10/05/2017, but application in this regard was not entertained at CPO Peshawar.

6. Therefore, the applicant submitted another application dated 10/08/2017 for placing the applicant name at own seniority amongst colleagues in the light of rules / policy of the government vide DPO, Dir Lower office Memo: No.24251/EC, dated 10/08/2017, but the applicant request was again dishonored.

7. In the meanwhile CPO Peshawar vide letter No. 792/CPB, dated 13/09/2017 asked for no departmental enquiry certificates in respect of applicant colleagues in connection with promotion as Assistant Grade Clerks, wherein applicant's name was not mentioned in the letter, therefore, the applicant lodged Service Appeal No.1067/2017 on 25/09/2017 before August Service Tribunal, KPK, Peshawar for fixing of seniority in the Seniority List of Senior Clerks with application for including provisionally name in the letter No.792/CPB, dated 13/09/2017 for further promotion as Assistant Grade Clerk, but applicant's application dated 23/09/2017 was also again not entertained at CPO, Peshawar, hence his junior colleagues were promoted as Assistant Grade Clerk vide CPO Peshawar No.6757-80/E-V, dated 08/11/2017.

8. On 29/01/2018 the August Service Tribunal, Khyber Pakhtunkhwa, Peshawar allowed seniority while deciding the applicant Service Appeal No.1067/2017, therefore, the applicant submitted application through Region Office, Swat vide Memo: No.2161/E, dated 27/02/2018 for promotion as Assistant Grade Clerk and fixing of seniority with colleagues in the seniority list of Assistant Grade Clerks in the light of August Service Tribunal, Khyber Pakhtunkhwa,

C.T.C  
Advocate

(50)

Peshawar judgment, but the mentioned application has not yet been entertained or decided at CPO Peshawar.

9. The CPO Peshawar vide order No.5170-80/E-V, dated 01/11/2018 has placed the applicant name at S/No.10 in the light of August Service Tribunal, Khyber Pakhtunkhwa, Peshawar judgment, but promotion of applicant as Assistant Grade Clerks and fixing of seniority amongst colleagues with back benefits has not yet been issued due to which the applicant is badly affecting financially as well as in the seniority list of Assistant Grade Clerk.

It is, therefore, humbly requested that the applicant may very be promoted as Assistant Grade Clerk from the date of eligibility with all back benefits and seniority in the seniority list of Assistant Grade Clerks may also kindly be fixed with colleagues in the light of rules and obliged.

Photocopies of relevant papers are submitted for kind consideration please.

Yours Obediently,

*Hussain Ali*

(HUSSAIN ALI)

Senior Clerk,

Region Office, Swat

Dated 09/07/2019

C.T.C  
~~Advocate~~

(47)



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

**Ph: 0946-9240388 & Fax No. 0946-9240390**

**Email: ebmalakandregion@gmail.com**

No. 9882 /E, dated Saidu Sharif the 11 / 1 / 09 / 2019

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

Subject: **APPLICATION**

Memorandum:

Enclosed kindly find herewith a self-explanatory application submitted by Senior Clerk Hussain Ali of this office is sent herewith for consideration please.

Encl- (24)

Regional Police Officer,  
Malakand Region Swat  
"Salim"

C.T.C  
Advocate



(40) Annex-<sup>n</sup> K  
**FOR PUBLICATION IN THE KHYBE PAKHTUNKHWA  
POLICE GAZETTE PART-II, ORDERS BY THE INSPECTOR  
GENERAL OF POLICE KHYBER  
PAKHTUNKHWA PESHAWAR**

2987/E

01-10-19

Dated Peshawar/ 7/09/2019

**NOTIFICATION.**

No. 4314-31 /E-V, **PROMOTION** :- In pursuance of the Departmental Promotion Committee Meeting held on 29.07.2019 at CPO Peshawar under the Chairmanship of Addl: Inspector General of Police, HQrs: Khyber Pakhtunkhwa, duly approved by the Inspector General of Police, Khyber Pakhtunkhwa, the following Senior Clerks (BS-14) are hereby promoted as Assistant Grade Clerks (BS-16), with immediate effect:-

Office of The  
Dy: Inspector General Of Police  
Training, Khyber Pakhtunkhwa,  
Peshawar.

Dy: No 5044 /Tg  
Dt 17-9-2019

S. NO.	NAME	PRESENT POSTING
✓ 1.	Akbar Ali	DPO Office Swat ✓
2.	Shah Farooq	SP/FRP Kohat Range
3.	Waheed-ur-Rehman	RPO Office Hazara
✓ 4.	Hussain Ali	RPO Office Malakand ✓
5.	Muhammad Hamayun	DPO Office Charsadda
6.	Muhammad Ramzan	SP/Investigation Office D.I Khan
7.	Shafqat Hayat	SP/Investigation Office Kohat
8.	Muhammad Javed	Telecommunication Office Peshawar
9.	Dildar Hussain	RPO Office Kohat
10.	Amjad	DPO Office Torghar
11.	Sikandar Khan	SP/FRP Kohat Range
12.	Zahid Ullah	CCP Office Peshawar
13.	Abdul Hakim	DPO Office Swabi
14.	Muhammad Nasir	Audit Cell CPO
15.	Muhammad Riaz	CCP Office Peshawar
✓ 16.	Inayat Ullah	SP/Investigation Office Swat ✓
17.	Farmanullah	DPO Office Nowshera
18.	Minhaj-ud-Din	Budget Branch CPO
19.	Ali Asghar	CCP Office Peshawar
20.	Israr Ali	Police School of Tactics Peshawar
21.	Ahdu Wadood	CCP Office Peshawar ✓
22.	Murtaza	DPO Office Nowshera
23.	Muhammad Azhar	DPO Office Swabi
24.	Jehanzeb	Elite Force CPO
25.	Muhammad Idrees	Commandant FRP Office Peshawar
26.	Wajid Ali	CCP Office Peshawar
27.	Ikram Ullah	DPO Office D.I Khan
28.	Basher Ahmad	CCP Office Peshawar
✓ 29.	Muhammad Ashraf	DPO Office Upper Dir ✓
✓ 30.	Daud Shah	SP/Investigation Office Buner ✓
✓ 31.	Sher Zanfin	-do- ✓
✓ 32.	Amreez Khan	DPO Office Buner ✓
33.	Syed Munawat Ali Shah	SP FRP Office Peshawar
✓ 34.	Fazal Wahab	DPO Office Buner ✓
35.	Tariq Hameed	SP/Inv: Office Abbottabad
36.	Arbab Inam Ullah Jan	Operations Branch CPO
37.	Sohail Ahmad	CCP Office Peshawar

Ec

C.T.C

Advocate



**FOR PUBLICATION IN THE KHYBE PAKHTUNKHWA  
POLICE GAZETTE PART-II, ORDERS BY THE INSPECTOR  
GENERAL OF POLICE KHYBER  
PAKHTUNKHWA PESHAWAR**

38.	Fayaz Khan	E-II Branch CPO
39.	Khalid Mehmood	Elite Force CPO
40.	Sajid Hussain	DPO Office Upper Kohistan
41.	Muhammad Naeem Jan	Secret Branch CPO
42.	Fayaz Ahmad	Traffic Warden Peshawar
43.	Muhammad Anwar Shah	SP/FRP Kohat Range
44.	Anwar-ul-Hassan	DPO Office Nowshera
45.	Akhtar Hussain	DPO Office D.J Khan
46.	Hamidullah Jan	Commandant FRP Office Peshawar
47.	Javed Iqbal	Operation Branch CPO
48.	Noor Khan	DPO Office Nowshera
49.	Nadeemullah	CCP Office Peshawar
50.	Khaista Gul	CPC Office Peshawar

**The terms and conditions of their promotion will be as under:-**

1. Their promotion will be on probation for a period of one year and also extendable for another one year in terms of Section-6 (02) of Khyber Pakhtunkhwa, Civil Servant Act-1977 read with Rules-15 (01) of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989.

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

Sd/-

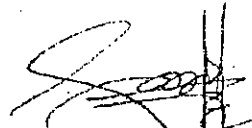
**Muhammad Naeem Khan Dr.PSP**  
Inspector General of Police  
Khyber Pakhtunkhwa,  
Peshawar.

**Endst: No. and dated even.**

Copy forwarded to the:-

- Addl: Inspector General of Police: HQrs Khyber Pakhtunkhwa, Peshawar.
- Addl: Inspector General of Police: Investigation, Khyber Pakhtunkhwa, Peshawar.
- Addl: Inspector General of Police: Elite Force, Khyber Pakhtunkhwa, Peshawar.
- Accountant General Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, HQrs, Khyber Pakhtunkhwa Peshawar.
- Capital City Police Officer, Peshawar.
- Commandant FRP Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, Training Khyber Pakhtunkhwa, Peshawar.
- Commandant CPC Peshawar.
- All Regional Police Officers, in Khyber Pakhtunkhwa.
- All DPOs and SsP/Investigations in Khyber Pakhtunkhwa.
- COS to the Worthy Inspector General of Police, Khyber Pakhtunkhwa.
- Registrar, CPO, Peshawar.
- All concerned District Accounts Officers in Khyber Pakhtunkhwa.
- Office Supdts: Secret and Career Planning Branch CPO, Peshawar.
- PA to Assistant Inspectors General of Police: Estt: CPO Peshawar.
- Accountant, CPO Peshawar.

*C.T.C*  
*Advocate*

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

(42)

Annex-2

To, The worthy Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

Through PROPER CHANNEL

Subject: REPRESENTATION IN RESPECT OF PROMOTION NOTIFICATION  
NO.4314-31/E-V, DATED 17/09/2019

C.T.C  
A. Akbar

*Respected Sir,*

It is submitted that the applicant has been promoted from the post of Senior Clerk to the post of Assistant Grade Clerk at S/No.4 vide above mentioned notification and request of applicant for promotion and seniority from eligibility date with all back benefits and seniority in the seniority list of Assistant Grade Clerk is inter alia from the following grounds:-

1. The name of applicant was at S/No.57 in the seniority list of Senior Clerks as stood on 31/12/2013 circulated vide CPO Peshawar Endst: No.264-99/E-V, dated 11/03/2014.
2. The applicant while posted at DPO Office Dir Lower was asked willingness vide CPO Peshawar No.365-74/E-V, dated 13/03/2014 for promotion as Assistant Grade Clerk subject to out posting and the same was submitted accordingly vide DPO, Dir Lower Office Memo No.6323/EB, dated 17/03/2014, but name of the applicant was ignored and applicant colleagues were promoted as Assistant Grade Clerks accordingly.
3. Later-on the name of applicant was also included in promotion list vide CPO Peshawar letter No.179-208/CPB, dated 26/01/2015 but applicant was also ignored and applicant colleagues were promoted as Assistant Grade Clerks vide CPO Peshawar No.394-406/CPB, dated 23/02/2015.
4. According to the seniority list of Senior Clerks of Khyber Pakhtunkhwa Police some colleagues of the applicant have already awarded major punishments are enjoying their own seniority in the seniority list.
5. The applicant submitted application dated 10/05/2017 for keeping his ACR's position on KPK Police website and fixing of his seniority amongst colleagues was forwarded to CPO Peshawar vide DPO Office, Dir Lower Memo: No.11877/EC, dated 10/05/2017, but application in this regard was not entertained at CPO Peshawar.
6. Therefore, the applicant submitted another application dated 10/08/2017 for placing the applicant name at own seniority amongst colleagues in the light of rules / policy of the government vide DPO, Dir Lower office Memo: No.24251/EC, dated 10/08/2017, but the applicant request was again dishonored.
7. In the meanwhile CPO Peshawar vide letter No. 792/CPB, dated 13/09/2017 asked for no departmental enquiry certificates in respect of applicant colleagues in connection with promotion as

for facts  
Regional Police Officer  
at Baldu Sharif Swat


Assistant Grade Clerks, wherein applicant's name was not mentioned in the letter, therefore, the applicant lodged Service Appeal No.1067/2017 on 25/09/2017 before August Service Tribunal, KPK, Peshawar for fixing of seniority in the Seniority List of Senior Clerks with application for including provisionally name in the letter No.792/CPB, dated 13/09/2017 for further promotion as Assistant Grade Clerk, but applicant's application dated 23/09/2017 was also again not entertained at CPO, Peshawar, hence his junior colleagues were promoted as Assistant Grade Clerk vide CPO Peshawar No.6757-80/E-V, dated 08/11/2017.

8. On 29/01/2018 the August Service Tribunal, Khyber Pakhtunkhwa, Peshawar allowed seniority while deciding the applicant Service Appeal No.1067/2017, therefore, the applicant submitted application through Region Office, Swat vide Memo: No.2161/E, dated 27/02/2018 for promotion as Assistant Grade Clerk and fixing of seniority with colleagues in the seniority list of Assistant Grade Clerks in the light of August Service Tribunal, Khyber Pakhtunkhwa, Peshawar judgment, but the mentioned application has not yet been entertained or decided at CPO Peshawar.
9. Later-on CPO Peshawar vide order No.5170-80/E-V, dated 01/11/2018 placed the applicant name at S/No.10 in the light of August Service Tribunal, Khyber Pakhtunkhwa, Peshawar judgment and applicant another submitted application dated 09/07/2019 to CPO Peshawar vide Region Office, Swat No.9882/E, dated 11/09/2019, which was also again not yet been entertained. But the applicant has since been promoted as Assistant with immediate effect vide above reference, but promotion of applicant as Assistant and fixing of seniority amongst colleagues with back benefits has not yet been issued due to which the applicant is badly affecting financially as well as in the seniority list of Assistant Grade Clerk.

It is, therefore, humbly requested that the applicant may very kindly be promoted as Assistant Grade Clerk from the date of eligibility with all back benefits and seniority in the seniority list of Assistant Grade Clerks may also kindly be fixed with colleagues in the light of rules and obliged.

Photocopies of relevant papers are submitted for kind consideration please.

C. A. C.  
Advocate

Yours Obediently,  
  
(HUSSAIN ALI)  
Assistant Grade Clerk,  
Region Office, Swat  
Dated 27/09/2019

46



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

**Ph: 0946-9240388 & Fax No. 0946-9240390**

**Email: [ebmalakandregion@gmail.com](mailto:ebmalakandregion@gmail.com)**

No. 13237 /E, dated Saidu Sharif the 09 / 12 /2019

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

Subject: **APPLICATION/ REPRESENTATION.**

**Memorandum:**

Enclosed kindly find herewith an application /representation submitted by Assistant Grade Clerk Hussain Ali of this office, requesting therein for promotion as Assistant Grade Clerk from the date of eligibility with all back benefit and fixing of seniority in the list of Assistant Grade Clerk with his colleagues is sent herewith for consideration please.

Encls:-(29)

**Regional Police Officer,  
Malakand/Region Swat**

*[Handwritten signature]*  
6/12

*[Handwritten signature]*  
Advocate



بعدالت صواب مسروس کی پیروی جیٹریٹو کو مقام لیسٹ اور راز کیس کورٹ کو  
 عدالت صواب مسروس کی پیروی جیٹریٹو کو مقام لیسٹ اور راز کیس کورٹ کو

موزعہ 20 فروری 2020 متجانب سائن اپیلانٹ

مقدمہ حسن علی بنام حکومت و غیرہ

دعویٰ Sensitive Appeal

جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنے طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام کیس کورٹ مسروس کے لئے محمد علی اور ریحان انڈیکس سپریم کورٹ کو مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ و تقرر ثالث و فیصلہ بر حلف دینے جواب دہیا و اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف اپیل کی برآمدگی اور منسوخ مذکور کے مکمل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے 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 پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند رہے

2020

ماہ فروری

المرقوم 20

العبد

گواہ شہد

العبد  
 حسن علی - سائل

العبد

گواہ شہد

العبد

Accepted by  
 Muhammad Farid Khan  
 Advocate Supreme Court  
 0343 960 7492

کیس کورٹ مسروس مقام

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

**Service Appeal No. 2032/2020**

Hussain Ali S/O Farzand Ali R/O Gunbat Maira Mingora Tehsil Babuzai, District Swat (Assistant Grade Clerk Police Department presently at RPO Office Saidu Sharif Swat)

..... Appellant


**VERSUS**

Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others

..... Respondents

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S.No:	Description of Documents	Annexure	Page
1	Para-wise Comments	-	1-3
2	Affidavit	-	4
3	Authority Letter	-	5
4	Copy of DPC Meeting minutes	"A"	6-8
5	Copy order dated 21/04/2015	"B"	9-10

  
District Police Officer, Swat  
District Police Officer,  
Swat

(1)

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

**Service Appeal No. 2032/2020**

Hussain Ali S/O Farzand Ali R/O Gunbat Maira Mingora Tehsil Babuzai, District Swat (Assistant Grade Clerk Police Department presently at RPO Office Saidu Sharif Swat)

..... Appellant

**VERSUS**

Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others

..... Respondents

**PARAWISE REPLY BY RESPONDENTS**

**Respectfully Sheweth,**

**Preliminary Objections.**

1. That the appeal is badly barred by Law & limitation.
2. That the appellant has got no Cause of action and locus standi to file the present appeal.
3. That the appeal is bad due to misjoinder and nonjoinder of necessary parties.
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. Incorrect. The appellant is presently posted in the office of District Police Officer, Dir Lower.
2. Pertain to record, hence needs no comments.
3. First portion of this para pertain to record, however with respect to remaining para, it is submitted that a departmental enquiry was underway against the appellant for issuing bogus driving licenses.
4. Before DPC, requisite information was collected for available vacancies (03 per available post). Therefore, his information was also asked vide CPB No.179-208/CPB dated 26/01/2015. However, during the DPC held on 04/02/2015, the available vacancies were filled till serial No.43 of the above letter while his ~~was named~~ was placed at serial number 56.
5. This para is for the petitioner to prove, however with respect to remaining para, the appellant was charge sheeted for issuing fake licenses on the name of DSP,

the then MLA Swat which was proved during departmental enquiry and he was awarded punishment of compulsory retirement by the competent authority vide order No.2569/E-V dated 21/04/2015 (annexure "B")

6. Pertain to record.

7. Pertain to record.

8. First portion of this para pertain to record, however with respect to remaining para, it is submitted that the appellant has been treated in accordance with law.

9. Pertain to record.

10. Incorrect. Appellant was not considered for promotion in DPC due to pending of departmental enquiry. Furthermore, no DPC was held after year 2017. The only DPC held was in the year 2019 wherein he was promoted as Assistant Grade Clerk.

11. Pertain to record.

12. That the appellant was promoted as Assistant Grade Clerk after fulfilling the required criteria for the subject promotion.

13. Pertain to record, however the application of appellant will be examined in DPC whenever held by the respondent department.

14. Incorrect. That the instant service appeal may kindly be dismissed on the following grounds.


**GROUND:**


- i. Incorrect. That the order passed by respondent is legal and in accordance with law/rules.
- ii. Incorrect. That no violation of any section of Khyber Pukhtunkhwa Civil Servant Act, 1973 and Khyber Pukhtunkhwa Civil Servant APT Rules, 1989 have been violated by the respondent.
- iii. Incorrect. No article of constitution of Islamic Republic of Pakistan has been violated by the respondents.
- iv. Incorrect. As explained above. The notification has been issued by the respondents in accordance with the minutes of DPC which was carried out in accordance with law/rules

v. That the respondent may also be allowed to raised additional grounds at the time of arguments.

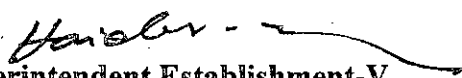
**PRAYER:**


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.

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

  
Assistant Inspector General  
of Police (Establishment)  
Khyber Pukhtunkhwa Peshawar  
(Respondent No. 2)

  
Regional Police Officer,  
Malakand Region  
(Respondent No. 3),  
Regional Police Officer,  
Malakand Region,  
Saidu Sharif, Swat.

  
Superintendent Establishment-V  
(CPO) Peshawar  
(Respondent No. 4)

  
Incharge Career Planning  
Branch CPO Peshawar  
(Respondent No. 5)

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

**Service Appeal No. 2032/2020**

Hussain Ali S/O Farzand Ali R/O Gunbat Maira Mingora Tehsil Babuzai, District Swat (Assistant Grade Clerk Police Department presently at RPO Office Saidu Sharif Swat)

..... Appellant

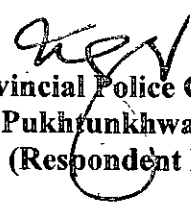
**VERSUS**


Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others

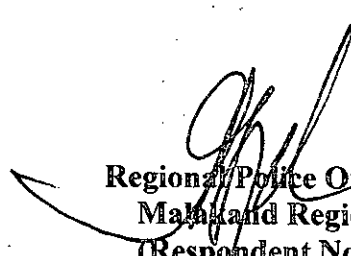
..... Respondents

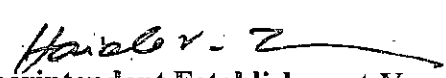
**AFFIDAVIT**

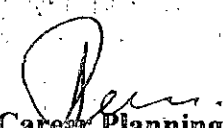
We, the above respondents do hereby solemnly affirm on oath and declare that the contents of the appeal are correct/true to the best of our knowledge/ belief and nothing has been kept secret from the honorable Tribunal.

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

  
Assistant Inspector General  
of Police (Establishment)  
Khyber Pukhtunkhwa Peshawar  
(Respondent No. 2)

  
Regional Police Officer,  
Malakand Region  
(Respondent No. 3)  
Regional Police Officer,  
Malakand Region,  
Saidu Sharif, Swat.

  
Superintendent Establishment-V  
(CPO) Peshawar  
(Respondent No. 4)

  
Incharge Career Planning Branch  
CPO Peshawar  
(Respondent No. 5)

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

5

**Service Appeal No. 2032/2020**

Hussain Ali S/O Farzand Ali R/O Gunbat Maira Mingora Tehsil Babuzai, District Swat (Assistant Grade Clerk Police Department presently at RPO Office Saidu Sharif Swat)

..... Appellant


**VERSUS**


Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others


..... Respondents

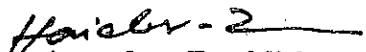
**AUTHORITY LETTER**


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

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

  
Assistant Inspector General  
of Police (Establishment)  
Khyber Pukhtunkhwa Peshawar  
(Respondent No. 2)

  
Regional Police Officer,  
Malakand Region-  
(Respondent No. 3)  
Regional Police Officer,  
Malakand Region,  
Saidu Sharif, Swat.

  
Superintendent Establishment-V  
(CPO) Peshawar  
(Respondent No. 4)

  
Incharge Career Planning  
Branch CPO Peshawar  
(Respondent No. 5)

(13)

Annex (A)

6

C.T.C  
M. Farid Khan  
A.S.C

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

NO. 263

/E-V, The seniority list of Senior Clerks: - The seniority list of Senior Clerks is published for information of all concerned.

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
1.	Khair Muhammad	Bannu	10 <sup>th</sup>	09.11.54	05.02.76	04.12.86	Promotion forgone for ever vide DIG/Bannu letter No. 2643/ES dated 28.09.98
2.	Qamar Zaman	Bannu	BA	05.02.56	30.9.80	27.3.90	
3.	Akbar Ali	Swat	10 <sup>th</sup>	9.2.63	17.1.82	17.7.90	
4.	Bakhat Afsar	Swat	10 <sup>th</sup>	1.2.58	20.4.81	16.2.91	
5.	Gul Faraz	Mardan	10 <sup>th</sup>	4.10.54	7.4.76	11.7.91	
6.	Muzafar Iqbal	Peshawar	10 <sup>th</sup>	16.02.60	01.08.74 FC 01.05.79 JC	15.10.91	Re-instate in service 31.12.2009
7.	Alam Khan	Swat	BA	2.2.56	1.6.80	01.3.92	
8.	Haibat Khan	Bannu	FA	30.09.63	19.8.82	16.8.92	
9.	Muhammad Yousaf	A. Abad	10 <sup>th</sup>	25.12.62	28.11.83	22.8.93	
10.	Muhammad Saleem	Peshawar	10 <sup>th</sup>	10.09.64	08.11.82	11.12.2012	Assigned revised seniority vide Order No. 19192-93/E-III dated: 06.08.2013
11.	Muhammad Sultan	Mansehra	10 <sup>th</sup>	25.5.55	24.4.77 NQ 14.12.83 JC	22.8.93	
12.	Sania Ullah	Charsadda	BA	11.3.63	18.4.86	25.4.94	
		Charsadda	F.A	21.10.66	11.01.87	03.01.96	



(14)

4

7

Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
Riaz Muhammad	Abbottabad	BA	14.04.63	28.09.89	16.01.2008	
Abdul Aziz -II	Mardan	10th	10.02.70	01.06.89	16.01.2008	
Khurshid Ahmad	Swat	FA	14.05.56	21.12.80 Class-IV 17.10.89 JC	16.01.2008	
Waheed ur Rehman	Abbottabad	D.Com	25.12.68	22.10.89	16.01.2008	
Nizakat Khan	Haripur	10th	20.04.69	16.10.89	16.01.2008	
Hussain Ali	Swat	FA	08.06.68	05.06.86 Class-IV 31.12.89 JC	16.01.2008	←
58. Naseer Ahmad	Peshawar	FA	04.10.65	07.01.90	16.01.2008	
59. Ishtiaq Hussain	Charsadda	10th	20.08.71	10.01.90	16.01.2008	
60. Muhammad Humayun	Charsadda	10th	04.04.65	01.09.89 FC 29.03.90 JC	16.01.2008	
61. Muhammad Rainzan	DIKhan	10th	15.03.69	01.07.90	16.01.2008	
62. Shafaqat Hayat	Kohat	10th	29.12.69	09.07.90	16.01.2008	
63. Haq Nawaz	Mansehra	10th	06.01.59	01.12.81	08.08.2009	
64. Muhammad Aslam	Bannu	10th	18.05.65	06.10.85	02.12.2009	
65. Dildar Hussain	Kohat	10th	20.06.62	10.12.87	05.06.2009	
66. Muhammad Jamshid	Mansehra	10th	20.03.63	18.02.88	05.06.2009	
67. Muhammad Fahim	Mardan	10th	10.03.66	02.03.88	05.06.2009	
68. Amjad	Mansehra	FA	21.04.65	10.03.88	05.06.2009	

C.T.C  
M. Jawad Khan  
A.S.C

Handwritten signature  
EV  
11-3-14

C.T.C  
M. Javed Khan  
P.S.C

VS

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

E.C / ALL DPOs  
for no action.

No. 2173-78 / E  
dt 21-3-2014

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

F. 11-13/014

Office Supdt.  
For Regional Police Officer,  
Malakand, at Saidu Sharif Swat.

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

- Copy of above is forwarded for information and necessary action to the
1. All Addl: IsGP in Khyber Pakhtunkhwa
  2. All Regions Disc in Khyber Pakhtunkhwa
  3. Capital City Police Officer Peshawar
  4. DisG CTD, Traffic & Telecommunication, Khyber Pakhtunkhwa Peshawar
  5. Commandant's PTC Hanau,
  6. Registrar CPD

EV  
11/13/14

No. 569 /E-V,

Dated

Peshawar the

21-4 /2015

ORDER

This order will dispose of departmental enquiry against the following officials: -

1. Mushtaq Ahman, Asstt: Grade Clerk DPO Swat.
2. Khurshid Ahmad, Senior Clerk DPO Swat.
3. Hussain Ali, Senior Clerk DPO Swat.
4. Muhammad Nawab, Senior Clerk DPO Swat.

2. The above accused officials were Charge Sheeted on account of the posting to Driving License Branch Swat for the period from 08.03.2010 to 29.08.2012 whereas they were held responsible for issuance of bogus driving licenses under the fake signatures of Mr. Jehangir Khan, the then DSP, MLA Swat. The allegations were confirmed in the preliminary enquiry conducted by DSP/HQ Swat. Hence they were proceeded under proper departmental proceedings and Legal Swat was appointed as Enquiry Officer.

3. The Enquiry Officer submitted his finding report which is placed on enquiry file in which the allegations were established and all the above officials were held responsible for committing fraud and other irregularities in the license branch.

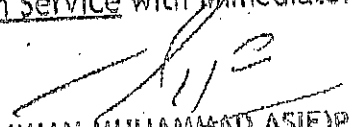
4. The accused officials were served with Final Show Causes. They submitted their replies accordingly. Finally they were summoned in the office of the undersigned and heard at length.

5. The accused officials failed to rebut the charges nor could produce any cogent evidence in their defense.

6. I have gone through the entire material placed before me which depicts that besides departmental enquiry, the matter remained under enquiry with DSP/HQs Swat who conducted enquiry u/s 157(1) Cr.P.C vide Daily Order No.41 dated 24.09.2012. In the said enquiry, the Enquiry Officer established charges through FSL and independent evidence u/s 157(1) Cr.P.C. The charges were proved against the delinquent officials beyond any shadow of doubt. The accused officials have committed gross misconduct in sheer violation of their official duties and have earned bad name for the entire Police Department.

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE  
PESHAWAR  
Ph: 091-9210545 Fax: 091-9210927

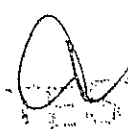
7. Henceforth, I, MIAN MUHAMMAD ASIF, Addl: Inspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar being Competent Authority, under Khyber Pakhtunkhwa, E & D Rules-1973 (Amended in 2011), hereby award them Major Punishment of compulsory retirement from Service with immediate.

  
(MIAN MUHAMMAD ASIF)PSP  
Addl: IGP/HQrs:  
For Inspector General of Police  
Khyber Pakhtunkhwa  
Peshawar

No. 2570-76/E-V dated Peshawar the, 21/4/2015.

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

1. Regional Police Officer, Malakand Region Swat.
2. Deputy Inspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar.
3. Asstt: Inspector General of Police Establishment CPO, Peshawar.
4. Asstt: Inspector General of Police Legal CPO Peshawar.
5. District Police Officer, Swat.

  
ATTESTE

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES**  
**TRIBUNAL AT PESHAWAR**

CM No. \_\_\_\_\_ of 2022

In

Service Appeal No. 2032 of 2020

Hussain Ali

..... Appellant

VERSUS


PPO etc

..... Respondents

**INDEX**

S.#	Description of Documents	Annex:	Pages
1.	Application	-	1-2
2.	Affidavit	-	3
3.	Copy of Additional Documents	A	4-20

Applicant / Appellant  
Through Counsel

  
**Muhammad Javaid Khan**  
Advocate Supreme Court  
of Pakistan

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL AT PESHAWAR**

CM No. \_\_\_\_\_ of 2022

In

Service Appeal No. 2032 of 2020

Hussain Ali ..... Appellant

VERSUS

PPO etc ..... Respondents

**APPLICATION FOR PLACING ON FILE ADDITIONAL  
DOCUMENT, WHICH ARE 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 Tribunal, in which next date of hearing is 07/07/2022.
2. That the Applicant/ Appellant wants to place on file certain documents. (Copy of additional documents is attached herewith as annexure "A")
3. That the above mentioned additional documents are 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.

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

Applicant / Appellant  
Through Counsel

Muhammad Javaid Khan  
Advocate Supreme Court  
of Pakistan

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL AT PESHAWAR**

CM No. \_\_\_\_\_ of 2022

In

Service Appeal No. 2032 of 2020

Hussain Ali

..... Appellant

VERSUS

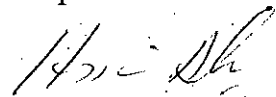
PPO etc

..... 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



Hussain Ali

Identified by;



**Muhammad Javaid Khan**  
Advocate Supreme Court  
of Pakistan



Annex A

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA  
POLICE GAZETTE PART-II, ORDERS BY THE INSPECTOR  
GENERAL OF POLICE KHYBER PAKHTUNKHWA  
PESHAWAR

Peshawar 31/10/2017

NOTIFICATION

No. 6561-90 /P-V. PROMOTION of Senior Clerks to the rank of Assistant Grade Clerks (BS-16) on regular basis with immediate effect:-

As per the provision contained in Serial No. 2 of the Khyber Pakhtunkhwa Police Ministerial Rules-1974 the Competent Authority i.e. Inspector General of Police Khyber Pakhtunkhwa, on recommendations of the Departmental Selection Committee meeting held on 18.10.2017 is pleased to promote the following Senior Clerks (BPS-14) to the rank of Assistant Grade Clerks (BS-16) on regular basis with immediate effect:-

S.No	NAME
1)	Muhammad Yousaf of RPO/Abbottabad
2)	Sana Ullah of Special Branch, KPK Peshawar
3)	Zahir Ullah of CCP office Peshawar
4)	Taj Muhammad of Inv: Wing Nowshera
5)	Muhammad Janshed of DPO office Manshera
6)	Ihsan Ullah of DPO office Charsadda ✓
7)	Sajjad Hussain of CCP office Peshawar
8)	Ihsan Ullah of CPO, Peshawar
9)	Javed Ali of DPO office Charsadda ✓
10)	Inam Ullah of FRP/Hazara Range
11)	Sajjad Anwar of DPO office Kohat
12)	Muqarrab Alam Khan of RPO/Mardan
13)	Abur Rauf of CCP office Peshawar
14)	Ichseen Ullah of CPO, Peshawar.
15)	Nadeem Ahmad of CPO, Peshawar.
16)	Riaz Muhammad of FRP/Hazara Range
17)	Nizakat Khan of RPO office Abbottabad.
18)	Nuseer Ahmad of SSP/Traffic office, Peshawar
19)	Ishtiaq Hussain of DPO office Charsadda ✓

The terms and conditions of their promotion will be as under:-

- Their promotion will be on probation for a period of one year and also on the terms of Section-6 (02) of Khyber Pakhtunkhwa, Civil Servant (Appointment, Probation and Extension) Rules, 1974 and also on the terms of Section-6 (01) of Khyber Pakhtunkhwa, Civil Servant (Appointment, Probation and Extension) Rules, 1974.
- Their promotion will take effect from the date of their appointment to the rank of Assistant Grade Clerks (BS-16) on regular basis with immediate effect:-

4-A

**BETTER COPY**

**FOR PUBLICATION I THE KHYBER PAKHTUNKHWA,  
POLICE GAZETTE PART-II, ORDERS BY THE INSPECTOR GENERAL  
OF POLICE, KHYBER PAKHTUNKHWA PESHAWAR**

Dated Peshawar the, 3/10/2017

**NOTIFICATION**

No. **6561-90/E-V**, **PROMOTION**. In pursuance of the provision contained in Serial No.2 of the Khyber Pakhtunkhwa Police Ministerial Rules-1974 the Competent Authority i.e Inspector General of Police, Khyber Pakhtunkhawa, on recommendations of the Departmental Selection Committee meeting held on 18/10/2017 is pleased to promote the following Senior Clerks (BPS-14) to the rank of Assistant Grade Clerks (BS-16) on regular basis with immediate effect:-

S.No	Name
1.	Mohammad Yousaf of RPO Abbottabat
2.	Sanaullah of Special Branch, KPK, Peshawar
3.	Zahirullah of CCP Office Peshsewar
4.	Taj Mohammad of Investigation Wing, Nowshera.
5.	Muhammad Jamshed of DPO Office Mansehra.
6.	Ilhamullah of DPO Office Charsadda.
7.	Sajjad Hussain of CCP Office Peshawar.
8.	Ihsanullah of CPO, Peshawar.
9.	Javed Ali of DPO Office Charsadda.
10.	Inamullah of FRP/Hazara Range.
11.	Sajjad Anwar of DPO Office, Kohat.
12.	Muqrrab Alam Khan of RPO Mardan.
13.	Abdur Rauf of CCP office Peshawar
14.	Tehseenullah of CCP, Peshawar
15.	Nadeem Ahmad of CPO, Peshawar
16.	Riaz Muhammad of FRP/Hazara Range.
17.	Nizakat Khan of RPO Office Abbottabad.
18.	Naseer Ahmad of SSP/Traffic Office, Peshawar.
19.	Ishtiaq Hussain of DPO Office, Charsadda.

**The terms and conditions of their promotion will be as under:-**

1. Their promotion will be on probation for a period of one year and also extendable for another one year in terms of Section-6 (02) of Khyber Pakhtunkhwa, Civil Servant Act-1973 read with Rules-15 (01) of Khyber Pakhtunkhwa Civil Servant (Appoint, Promotion and Transfer) Rules, 1989.
2. Their promotion will take effect from the date of they actually assume the charge of their higher responsibilities.

Sd  
PROVINCIAL POLICE OFFICER,  
KHYBER PAKHTUNKHWA, PESHAWAR

(4) (5)

BEFORE THE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 1067 /2017

- 1) Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora,  
Tehsil Babozai District Swat (Senior Clerk Police  
Department, Presently at DPO Office Dir Lower)

.....Appellant

**VERSUS**

- 1) Provincial Police Officer Government of Khyber  
Pakhtunkhwa at Central Police Office (CPO) Peshawar
- 2) Assistant Inspector General of Police (Establishment) Khyber  
Pakhtunkhwa at CPO Peshawar
- 3) Deputy Inspector General of Police / Regional Police Officer  
(RPO) Malakand Region at Swat
- 4) District Police Officer Dir Lower at Temergara
- 5) Superintendent Establishment -V (CPO) Peshawar
- 6) In-charge Career Planning Branch (CPO) Peshawar

.....Respondents

(2) (6)

Service Appeal Under Section 4 of Service Tribunal Act read with other relevant provisions against the impugned order / seniority list dated: 31/12/2016 issued by respondent No.1, in respect of Senior Clerks BPS-14, whereby the seniority position of the appellant has been lowered illegally and unlawfully from No.57 as it stood in the seniority list No. 263 dated: 31/12/2013.

PRAYER:

On acceptance of this service appeal the impugned order / seniority list issued by respondent No.1 dated: 31/12/2016 may kindly be rectified / modified to the extent of appellant, and the appellant may be listed at previous / original position at Serial No. 57 as it stood in the list issued on 31/12/2013. It is further prayed, that name of the appellant be included in the list / letter No. 792 / CPB Dated: 13/09/2017, and may be promoted accordingly.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favor of appellant against respondents.

Respectfully Sheweth:

The appellant submits as under;

1. That the appellant is presently posted as Senior Clerk in the office of District Police Officer Dir Lower at Temergara.
2. That name of the appellant was at Serial No. 57 in the seniority list of the Senior Clerk BPS-14 in the KPK Province issued on 31/12/2013. (Copy of the seniority list dated: 31/12/2013 of the senior clerks BPS-14 is attached herewith as annexure "A").
3. That now in the seniority list of senior clerks BPS-14 issued on 31/12/2016, the appellant has been placed at Serial No.359 wrongly and illegally. (Copy of

(4) (8)

the seniority list dated: 31/12/2016 is attached herewith as annexure "B").

4. That names of the senior clerks mentioned in the seniority list dated: 31/12/2017 from serial No. 28 up to 358 may be considered as an integral part of this appeal and their names may be considered in the list of respondents. In this regard, an application under order 1 rule 10 CPC is also filed with this appeal.
5. That vide letter No. 464-534 / CBP Dated: 04/05/2017 respondent No.1 asked for representations for correction of seniority: (Copy of the letter 464-534 / CBP Dated: 04/05/2017 is attached herewith as annexure "C").
6. That the appellant than filed a representation / application dated: 10/<sup>05</sup>~~08~~/2017 to the respondent No.1 well within time i.e 15 days. (Copy of the

(5) (9)

representation / application dated:

10/08/2017 along with covering letter of

DPO Dir Lower dated: 10/08<sup>05</sup>/2017 is

attached herewith as annexure "D").

7. That the respondent No.1 has not decided the said representation up till now, and on the other hand, has issued letter No. 792 / CPB Dated: 13/09/2017 for processing the promotion cases of senior clerks. In the said letter, the senior clerks mentioned at serial No. 27 and onward up to serial No. 60 are junior to the appellant. (Copy of the letter No. 792 / CPB Dated: 13/09/2017 is attached herewith as annexure "E").

8. That the impugned order / seniority list dated: 31/12/2016 is illegal, unlawful, against facts available, unwarranted inter alia on the following grounds amongst others.

7  
u  
of

**GROUNDS:**

- i. That the impugned order / seniority list dated 31/12/2016 is illegal, unlawful, unconstitutional and based on mala-fide which is very much clear from the record on file.
- ii. That the impugned order / seniority list dated 31/12/2016 has been passed in violation of Section 8 of Khyber Pakhtunkhwa Civil Servant Act, 1973 and Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appoint, Promotion and Transfer) Rules, 1989.
- iii. That in the impugned seniority list, the reasons / remarks mentioned against the name of the appellant are incorrect, because the said denovo enquiry has been completed and the appellant was re-instated in service on 04/05/2017 by Regional Police Officer, Malakand at Saidu Sharif, Swat i.e Respondent No.3 (Copy of



(7) (11)

decision / order of Respondent No.3 dated 04/05/2017 is attached herewith as annexure "F").

iv. That the impugned order/seniority list is issued in violation of Article-9, 10-A, 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973.

v. That other grounds not specifically raised will be argued with the permission of this Hon'ble Court at the time of arguments.

9. That this appeal is being filed against the order / seniority list dated 31/12/2016, hence this Honorable Tribunal has got the jurisdiction and after letter dated 04/05/2017 of the respondent No.1 the representation dated 10/05/2017 by appellant, this appeal is bared by few days for which a separate condonation

(8) (12)

application is submitted along with this  
appeal.

It is therefore humbly prayed;-

Firstly, that on acceptance of this  
service appeal, the impugned order /  
seniority list issued by respondent  
No.1 dated: 31/12/2016 may kindly  
be rectified / modified to the extent  
of the appellant and the appellant  
may be placed at Serial No. 57 as he  
is stood in the seniority list issued  
on 31/12/2013. /

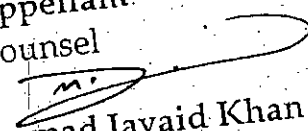
Secondly, that the name of the  
appellant be included in the letter  
No. 792 CPB dated: 13/09/2017 for  
onward promotion as assistant  
grade clerks.

(9)

(13)

Any other remedy which is  
just, appropriate and efficacious  
may also be awarded in favor of the  
appellant please.

Appellant  
Through Counsel

  
Muhammad Javaid Khan  
Advocate High Court

(7) (14)



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

Khyber Pakhtunkhwa Service Tribunal

Diary No. 1096

Dated 25/9/2017

Service Appeal No. 1067 /2017

1) Hussain Ali S/o Farzand Ali R/o Gunbat Maira Mingora,  
Tehsil Babozai District Swat (Senior Clerk Police  
Department, Presently at DPO Office Dir Lower)

.....Appellant

**VERSUS**

- 1) Provincial Police Officer Government of Khyber Pakhtunkhwa at Central Police Office (CPO) Peshawar
- 2) Assistant Inspector General of Police (Establishment) Khyber Pakhtunkhwa at CPO Peshawar
- 3) Deputy Inspector General of Police / Regional Police Officer (RPO) Malakand Region at Swat
- 4) District Police Officer Dir Lower at Temergara
- 5) Superintendent Establishment -V (CPO) Peshawar
- 6) In-charge Career Planning Branch (CPO) Peshawar

.....Respondents

Filed today

Registrar  
25/9/17

**ATTESTED**

EXAMINED  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

06.10.2017

Appellant alongwith counsel present. Preliminary arguments heard. The learned counsel for the appellant argued that the appellant was not given his due seniority in the seniority list of 2015 for the reason that after departmental proceedings a major penalty was imposed against him. That against this seniority list the Provincial Police Officer invited objections/representations which the appellant filed on 10.05.2017 but that representation has not been responded to and thereafter, the present appeal has been filed by the appellant on 25.09.2017.

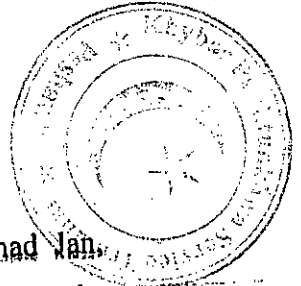
The grounds of appeal are that relegation of the appellant in seniority position was due to imposition of major penalty. That the major penalty has been converted into minor penalty. That minor penalty is also subjudice before this Tribunal which is fixed for 06.11.2017 at camp court Swat.

Appellant Deposited  
Security & Process Fee

The points raised need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents. To come up for written reply/comments on 06.11.2017 before S.B at camp court, Swat. Counsel for the appellant also brought attention of the Tribunal to misc. application filed with the memo of appeal for inclusion of his name in the upcoming promotion. Notice of application shall also be issued to the respondents for the date fixed.

Chairman  
Camp Court, Swat.

16



29.01.2018

Appellant alongwith counsel present and Mr. Mubammad Jan, Deputy-District Attorney alongwith Mr. Zewar Khan, S.I (Legal) for the respondents present. Arguments heard and record perused.

This appeal is also disposed of as per our detailed judgment of today in service appeal No. 508/2017 titled "Hussain Ali Versus Provincial Police Officer Khyber Pakhtunkhwa & others". Parties are left to bear their own costs. File be consigned to the record room.

Member

Chairman  
Camp Court, Swat

**ANNOUNCED**  
29.01.2018

Certified to be true copy  
Khyber Pakhtunkhwa  
Government  
Secretary

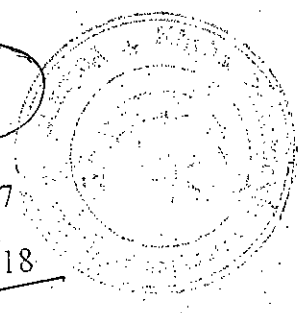
Date of Presentation of Case 14-2-18  
Number of Words 800  
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Total  
Name of Copyist  
Date of Copying 14-2-18  
Date of Delivery 14-2-18

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
CAMP COURT SWAT

Service Appeal No. 508/2017

Date of Institution... 23.05.2017

Date of decision... 29.01.2018



Hussain Ali son of Farzand Ali R/O Gunmbat Maira Mingora Tehsil Babozai,  
District Swat (Ex-Senor Clerk Police Department) ..... (Appellant)

Versus

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and four others.  
..... (Respondents)

MR. MUHAMAD JAVAID KHAN,  
Advocate ..... For appellant.

MR. MUHAMMAD JAN,  
Deputy District Attorney ..... For respondents.

MR. NIAZ MUHAMMAD KHAN,  
MR. GUL ZEB KHAN, ..... CHAIRMAN  
MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned  
counsel for the parties heard and record perused.

FACTS

2. The appellant was compulsorily retired on 21.4.2015 by the Inspector  
General of Police, Khyber Pakhtunkhwa, Peshawar. The appellant then filed  
service appeal bearing No. 874/2014 before this Tribunal which was decided on  
03.05.2016. In the said judgment, this Tribunal issued the direction for denovo

ATTESTED

Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

proceedings within a period of two months of the receipt of that judgment. The department however, initiated denovo proceedings and then dismissed the appellant on 29.03.2017. Against this order, the appellant filed departmental appeal on 3.4.2017 which was partially accepted on 4.5.2017 and thereafter, he filed the present service appeal on 23.05.2017.

ARGUMENTS

3. The learned counsel for the appellant argued that the department failed to conclude the departmental proceedings within given time hence the order of dismissal was illegal. That the department failed to issue fresh charge sheet after denovo proceedings. That in the denovo proceedings, the enquiry officer was appointed who exonerated the appellant on 25.7.2016. Thereafter another enquiry officer was appointed who also not recommended any penalty as per her report of 24.10.2016. That on 28.11.2016, the authority again directed the enquiry officer to conduct the enquiry afresh. That after that final show cause notice was issued to the appellant by the District Police Officer on 06.03.2017 and then the order of dismissal was passed on 29.3.2017. The learned counsel for the appellant further argued that proper procedure was not followed as no charge sheet was issued after the 'denovo proceedings nor the time given by the Tribunal was honored. That the majority of the proceedings were ordered by the incompetent authority. The learned counsel for the appellant also relied upon the judgment of the Worthy Peshawar High Court in Writ Petition No. 1541-P/2015 decided on 22.09.2016. He also relied upon a judgment reported as 2007-PLC(C.S)959.

ATTESTED

*[Signature]*  
Secretary  
Tribunal



(19) (19)

the original appointing authority nor he was delegated any disciplinary powers by the IGP.

*copy*

6. As a sequel to the above discussion, this Tribunal is of the view that the whole proceedings are illegal. The appellate order to the extent of back benefits etc. is set aside. Back benefits are allowed to the appellant subject to fulfillment of codal formalities regarding gainful employment etc. during the period he remained out of service. The appellant is also allowed seniority for the said period. Parties are left to bear their own costs. File be consigned to the record room.

*Announced*  
*29.01.2018*

*Ed. Muz Muhammad Khan*  
*Chairman*  
*Comp. Sect. Secy*

*Comptroller General*  
*[Signature]*

*Ed. Gulzar Khan*  
*Member*

Date of Receipt *14-2-18*  
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Title *D. n*  
Name *[Signature]*  
Date of *14-2-18*  
Date of *14-2-18*

بعدالت صواب سروس ڈیویژن خیر بخشہ خواجہ مقام ایسٹو رازر کیمپ کورٹ سوات  
مداخلت سوات

موزعہ 20 فروری 2020 متجانب سائن ایڈیشنٹ

مقدمہ حسین علی بنام حکومت و غیرہ

دعویٰ FIVE Appeal

جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنے طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام کیمپ کورٹ سوات سے لے کر محمد علی اورید خان ایڈووکیٹ سپریم کورٹ کو مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ و تقرر ثالث و فیصلہ برحلف دینے جواب دہیا و اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف اپیل کی برآمدگی اور منسوخ مذکور کے مکمل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے 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 پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند رہے

2020

ماہ فروری

المرقوم 20

العبد

گواہ شد

العبد  
حسین علی - سائنٹ

العبد

گواہ شد

العبد

Accepted by  
Muhammad Farid Khan  
Advocate Supreme Court  
0343 960 7492

کیمپ کورٹ سوات بمقام

**"B"**

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

No.

TIB

Appeal No.....2032..... of 2020

.....Hussain Ali..... Appellant/Petitioner

Versus

.....P.P.O. 19 P.I.C. Pesh...... Respondent

Respondent No.....3.....

Notice to:

Deputy Inspector General of Police  
(R.P.O.) Malakand Region at 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.....4-1-2021.....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.....11/12.....

Day of.....Nov.....2020

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.**

*TB*

No.

Appeal No..... *2032* ..... of 20 *20*

..... *Hussain Mi* ..... Appellant/Petitioner

Versus

..... *P.P.O. IAPK Pesh* ..... Respondent

Respondent No..... *67* .....

Notice to: - *Superintendent Establishment - V,  
IAPK CPO Peshawar.*

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..... *4-1-2021* ..... 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..... *11/11* .....

Day of..... *Nov* ..... 20 *20*

*at Comp Court Sindh*

*[Signature]*

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

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

**"B"**

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

No.

7B

Appeal No.....2032..... of 20 20

.....Mr. Saad Ali.....Appellant/Petitioner

Versus

.....PPC, Peshawar.....Respondent

Respondent No.....5.....

Notice to:

In-charge Planning Branch (PCO)  
PPC Peshawar

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.....20/2/20.....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.....11/2.....

Day of.....Monday.....20 20

at Camp Court Seat

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.**

No.

Appeal No..... of 20

2032

713

Appellant/Petitioner

Hussam Ali Versus

Respondent

P.P.O. 12 P.O. Pesh.

Respondent No.....

2

Notice to: -

Assistant Inspector General of Police

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.....

Day of.....20

Nov: 20

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.**

TB

No.

Appeal No. 2032 of 20 20

Hussain Ali Appellant/Petitioner

Versus

P.P.O. K.P.K. Pesh. Respondent

Respondent No. 1

Notice to:

Provincial Police Officer, Quat. of  
K.P.K. Peshawar.

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 14.12.20 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..... 11/11

Day of..... Nov. 20 20

at Camp Court Swat

[Signature]  
2011

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal  
Peshawar.

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

**"A"**

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

No.

121

APPEAL No. 2032 of 20 20

Hussain Ali

Appellant/Petitioner

Versus

PPO, KPN Pesh:

RESPONDENT(S)

✓  
Notice to Appellant/Petitioner

Hussain Ali So Sangar Ali  
A/o Comptroller General Muzra  
Mingara Tehsil Babazai  
Distt: Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27/5/2020 at at

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

at Camp Court Swat



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.



**"A"**

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

No.

APPEAL No. 2032 of 20 TB

20

Hussain Ali

Appellant/Petitioner

Versus

P.O. KPK Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Mohammad Jawaid Khan

Advocate Supreme Court

of Pakistan at Swat

03439607492

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal

on 23/8/2021 at 9:00 AM

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

at Camp Court Swat

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

**"B"**

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

TB

No.

Appeal No.....2032..... of 2020

.....Hussain Ali..... Appellant/Petitioner

Versus

.....P.P.O. K.P.T. Pesh:..... Respondent

Respondent No.....I.....

Notice to: —

Provincial Police Officer Genl: of K.P.T. 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.....23-8-2021.....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.....3-01.....

Day of.....August.....20 21

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.

TB

No.

2032

20

Appeal No. .... of 20

*Hussain Ali*

Appellant/Petitioner

*P.P.O. 10/17/72 Pesh.*

Respondent

Respondent No. ....

*Assistant Inspector General of Police*

Notice to:

*(Establishment) P.P.O. 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 *23/8/72* 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 *3rd* .....

Day of *August* ..... 20*72*.

*at Court Smt*

*[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.

No.

Appeal No. 2032 of 20 20

TB

Muhammad Ali Appellant/Petitioner

Versus

The PPO, 12 P T 11 Pesh. Respondent

Respondent No. ....

3

Notice to: Deputy Inspector General of Police / PPO,  
Malakand Region at Swat.

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 <sup>on</sup> 23/8/2020 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.....

Day of August 20 21

3/01

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.

No.

TB

Appeal No. .... 2032 ..... of 20 20

..... Muhammad Ali ..... Appellant/Petitioner  
Versus

..... P.P.O. 12/11/2021 Pesh. ..... Respondent

Respondent No. .... 4 .....

Notice to: -

Superintendent Establishment - V.C.P.O.,  
Govt. 12/11/2021 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 23/08/2021 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.....

Day of..... August ..... 20 21

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.

No.

TB

Appeal No.....2032..... of 2020

.....Hussain Aji..... Appellant/Petitioner

Versus

.....P.P.O. P.P. Pesh..... Respondent

Respondent No.....5.....

Notice to: -

In-charge Career Planning Branch  
C.P.O. P.P. 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.....23-8-2021.....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.

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

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....August.....2021

3rd

at Comptroller Smart

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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2. Always quote Case No. While making any correspondence.