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 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.

(Fareena Paul) Member (E) Camp Court, Swat (Rozina Rehman) Member (J) Camp Court, Swat

3.8.22

que la summer la catian the last is afferment

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.

owat.

(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 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

والمتحادث

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



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.

Champar

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 2020 before S.B at Camp Court, Swat.

Appellant Deposited
Security Process Fee

(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	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.
2	-	This case is entrusted to touring S. Bench at Swat for preliminary
2-		hearing to be put up there on 07-08-2020  Chairman
		Due to summer rocation,
ę		Due to summer rocation.  the case is adjumed. To come  up for the same on 08/10/20
	·	of For the same on 08/10/20
		Rosan
-		

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.

Notmoved

REGISTRAR **SERVICE TRIBUNAL** KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Muhammad Javed Adv. Swat.

The file is Sea entomic)
ofto daing the needfull, please.

S/Appel Files = 1 ovigned
(6) spare cypres.

Service Appeal No. 2032 /2020

#### **VERSUS**

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

#### **INDEX**

S. #	Description of Documents	Annexures	Pages
1	Service Appeal		1-8
2	Affidavit		9
3	Addresses of the Parties		10
5	Application for condonation of delay		11-12
6	Copy of Seniority List dated 31/12/2013	"A"	13-15
7	Copy of letter No.6323, dated 17/03/2014	"B"	16-18
8	Copy of CPO letter No. 179-208/CPB, Dated: 26/01/2015	"C"	19-21
9	Copy of ACR position of Senior Clerks of KPK Police (from 1/1/2011 to 31/12/2015)	"D"	22-25
10	Copy of application dated 10/05/2017 and No.11877/EC, dated 10/05/2017	"E"	26-27
.11	Copy of application dated 10/08/2017 and No.24251/EC, dated 10/08/2017	"F"	28-29
12	Copy of letter No.792/CPB, dated 13/09/2017 and No. 6757/CPB, Dated: 08/11/2017	"G"	30-33
13	Copy of application with letter No.2161/E, dated 27/02/2018	"H"	34-36
14	Copy of order No. 5171-80/E-V, Dated: 01/11/2018	"I"	· 37
15	Copy of appeal Dated: 09/07/2019	<i>"J"</i>	38-41
16	Copy of promotion order No.4313-31/E-V, dated 17/09/2019	"K"	42-44
17	Copy of application dated 27/09/2019 and No.1327/E, dated 09/12/2019	"L"	44-46
18	Wakalat Nama	1	47

Appellant
Through Counsel

Muhammad Javaid Khan Advocate Supreme Court of Pakistan

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

Service Appeal No. <u>2032</u> /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)

\*\*Presently at RPO Office Saidu Sharif Swat\*\*

\*\*Presently at RPO Office Swat\*\*

\*\*Presently at RPO Office Swat\*\*

\*\*Presently at RPO Offi

- Assistant Inspector General of Police (Establishment) Khyber
   Pakhtunkhwa at CPO Peshawar
- Deputy Inspector General of Police / Regional Police Officer
   (RPO) Malakand Region at Swat
- 4) Superintendent Establishment –V (CPO) Peshawar

1)

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

9

Ä

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 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").

Į.

- 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.

#### **GROUNDS:**

 $\mathcal{X}$ 

- 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.

J.

- 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

8

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

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.

The particular of the second

Identified by,

Muhammad Javaid Khan Advocate Supreme Court of Pakistan DEPONENT

Hussain Ali

1	Ser	vice App	eal No.			/2020	•	
Babozai	District	Farzanc Swat (A Office Sa	ssistant	Grade	Clerk	Police	Depar	tment,

### **VERSUS**

#### **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

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
ADDITION FOR COMPONING OF BELLIA OF BELLIA

# APPLICATION FOR CONDONATION OF DELAY OF FEW DAYS IN FILING THE INTANT SERVICE APPEAL

### Respectfully heweth:

The applicant / appellant submits as under:-

- 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** 

Bish.

SENIORITY LIST OF SENIOR CLERKS AS IT STOOD ON 31.12.2013

eniority list of Senior Clerks: - The seniority list of Senior Clerks is published for information of all concerned

ЙО		e seniority list of Home Distt:	Senior Clerks EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	PROMOTION AS	REMARKS
No	Name	*	·			S. Clerk	Promotion forgone for ever vide
1.	Khair Muhammad	Bannu	10 <sup>th</sup>	09.11.54	05.02.76	04.12.86	DIG/Bannu letter No. 2643/ES dated 28.09.98
•				05.02.56	30.9.80	27.3.90	
	Qamar Zaman	Bannu	BA	_ <del> </del>	17.1.82	17.7.90	-
2.		Swat	10 <sup>th</sup>	9.2.63		16.2.91	-
3,	Akbar Ali	Swat	10 <sup>th</sup>	1.2.58	20.4.81	11.7.91	
4.	Bakhat Afsar	Mardan	10 <sup>th</sup>	4.10.54	7.4.76		Re-instate in service 31.12.2009
5.	Gul Faraz	Peshawar	10 <sup>th</sup>	16.02.60	01.08.74 FC	15.10.91	Ke-mscace
6	Muzafar Iqual	Pesilawai			01.05.79 JC	24.2.02	
		Swat	BA	2.2.56	1.6.80	01.3.92	
7.	Alam Khan		FA .	30.09.63	19.8.82	16.8.92	
8.	Haibat Khan	Bannu		25.12.62	28.11.83	22.8.93	Assigned revised seniority vide
9.	Muhammad Yousaf	A. Abad	10 <sup>th</sup>	10.09.64	C8.11.82	11.12.2012	Order No. 19192-93/ E-III Gacett
10.	Muhammad Saleem	Peshawar	10.				06.08.2013
i iC.			10 <sup>th</sup>	- 25.5.55	24.4.77 NO 14.12.83 JC	22.8.93	
11.	Muhammad Sultan	Mansehra		!	18.4.86	25.4.94	
! 	3.44.	Charsadda	BA	11.3.63	11.01.87	03.01.96	11
12.		Charsadda	F.A	21.10.66			hora.
13.	. Hidayatullalı	- Aller State Control of the Control	10 <sup>th</sup>	02.11.64	15.02.87		EXT
14	Zar Banspan		RΔ	10.04.61	09.04.86	10.12.96	1-14-3-14

(	Name A. Yould A. S.	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
<u> 1865) -                                   </u>	<b>V</b>	Abbottabad	BA	14.04.63	28.09.89	16.01.2008	
	Riaz: Muhammad	Mardan	10th	10.02.70	01.06.89	16.01.2008	
- 4	Abdál Aziz II 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	
		Haripur	10th	20,04.69	16.10.89	16.01.2008	
10.00	Nizakat Khan Hussain Ali	Swat	FA	08.06.68	05.06.86 Class-IV 31.12.89 JC	16.01.2008	
58.	Naseer Ahmad W	Peshawar	FA	04.10.65	07.01.90	16.01.2008	The second of th
	1	Charsadda	10th	20.08.71	10.01.90	16.01.2008	A service of the serv
59. 60.	Ishtiaq Hussain ( ) Muhammad Humayun	Charsadda	10th	04.04.65	01.09.89 FC 29.03.90 JC	16.01.2008	
<u> </u>	Muhammad Rainzan /	DIKhan	10th	15.03.69	01.07.90	16.01.2008	
61.		Kohat	10th	29.12.69	09.07.90	16.01.2008	
62.	Shafaqat Hayat	Marisehra	10th	06.01.59	01.12.81	08.08.2009	
63.	Haq Nawaz	Bannu	10th	18.05.65	06.10.85	02.12.2009	
64.	Muhammad Astam	Kohat	10th	20.06.62	10.12.87	05.06.2009	
65.	Dildar Hyssain		10th	20.03.63	18.02.88	05.06.2009	Sport
66.	Muhammad Jamshid	Mansehra		10.03.66	02.03.88	05.06.2009	EV3-14
67.	Muhammad Fahim	Mardan	10th	21.04.65	. 10.03.88		
68.	Amjad	Mansehra	FA		01.01.87		
69.	Muhammad Tayyub	Charsadda	10th	27.03.62	(1.2014) an ionity liet of solid (all)	31 <del>)</del>	

aring Liest conducte Security of ministerial staff 2014/centionity list of settle 54, 12, 2013 doc

		Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS	REMARKS
/No	Name				CIACID (MEM )	S. Clerk	
		- Valat	F.Sc	10.08.1984	12.06.2009	22.07.2013	
351.	Saif ud Din	Kohat	, , , , , , , , , , , , , , , , , , , ,	11.03.1987	12.06.2009	22.07.2013	
352.	Farman Ali -	Shangla	F.A	08.03.1971	12.06.2009	22.07.2013	
353.	Muhammad Nawaz	Dir Upper	BA	l	12.06.2009	22.07.2013	
354.	Muhammad Haroon	DIKhan	10 <sup>th</sup>	27.07.1990		22.07.2013	
·	Kifayat Ullah	Bannu	FA	14.03.1988	12.06.2009	22.07.2013	
355.		Lakki	B.Sc (Hounrs)	05.04.1988	12.06.2009	7 5	
356.	Muhammad Shoaib	Lakki	FA	22,02.1984	12.06.2009	22.07.2013	
357.	Jalal ud Din		F.Sc	08.04.1989	12.06.2009	22.07.2013	
358.	Irfanullah	Lakki		07.04.1985	12.06.2009	22.07.2013	
359.	Faroog Shah	Charsadda	MA	07.017.700			

F.11-13/014

Office Superice Officer,

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

(MIAN MUHAMMAD ASIF)

E/V, dated Peshawar, the Malakand, at Saidu Sharii Swak. Copy of above is forwarded for information and necessary action to the

- 1. All Addl: IsGP in Khyber Pakhtunkhwa
- 3. Capital City Police Officer Peshawar
- Commandants PTC Hangu,

2. All Regions DIsG in Khyber Pakhtunkhwa

DISG CTD, Traffic & Telecommunication, Khyber Pakhtunkhwa Peshawar

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 7. Office Supdt: Secret CPO

representation within one week after the issuance of the list, otherwise no representation will be easily as a

*(16)* 

From:

The District Police Officer,

Dir Lower at Timergara

To:

The Provincial Police Officer,

Khyber Pakhtunkhwa, Peshawar

No. 6323

/EB dated Timergara the <u>17-3-</u>/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

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 Khan Absocate Subject:-

## <u>WILLINGNESS</u>

Respected Sir,

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

It is submitted that I am willing for transfer on promotion dated 13/03/2014 as Assistant (BPS-14) to Sensitive, Hard and far-flung district / Unit of the Province please.

Your's Obediently,

Senior Clerk Office of DPO Dir Lower at Timergara

W. Sovered Carles

Attention 8/c Hussain Mi on Lower Polices CEPO PESM 131230/100 R pos HZA, MAD, MON 100-Swat, CHS D 003 SEP INVST MON. DIR HAN. 14-53-014 NO: 365-74/E-1 213-3-14 SUBSINOS WILLING NESSEN THE POLLOWING your Ren' junity PRE QUE FOR PROMOTION PS THEIR WITHING MESS CENTIFICATE SUBJECT TO OUT POSTING BY TO DAY THROUGH PARTY S/10 MAME From Disti Desert Positive KINDSHID PHMAD. SWAT "DPEOPPLES WAS. ON SWAT MAN RANGERS MUSSAINALI No 3018-20/E FEDROSWOT BURNED Dr 14-34 2014 Franklin Mary 13-1510 18 Office Supdt: For Regidle of ce officer A840 Cente



(1987年) 14 18





To:

#### Office of the inspector General of Police Khyber Pakhtunkhwa, Peshawar.

/CPB, dated Peshawar the 26 /01/2015. Addi: 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, The Khyber Pakhtunkhwa, Peshawar. Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar. The The Deputy Inspector General of Police, Telecommunications, Khyber Pakhtunkhwa, Peshawar. The Deputy Inspector General of Police, Traffic, Khyber Pakhtunkhwa, Peshawar. 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 The Director, Campus Peace Corps, Khyber Pakhtunkhwa, Peshawar. The Director, FSL, Khyber Pakhunkhwa, Peshawar Commandant, FRP, Khyber Pakhtunkhwa, Peshawar. The The Commandant, Police Training College, Hangu. The Senior Supdt: of Police, Traffic, Peshawar. Deputy Supdt: of Police, PQR, Khyber Pakhtunkhwa, Peshawar. The Registrar, Central Police Office, Peshawar. The The

Supdt: Secret, Central Police Office, Peshawar. The

Supdt: Establishment-V, Central Police Office, Peshawar.

All Branches in CPO, Peshawar

Subject: Memo:

ANNUAL CONFIDENTIAL REPORTS AND NO DEPARTMENTAL ENQUIRY Please furnish Annual Confidential Reports and No Departmental Enquiry Certificatés .

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	<del></del>	Home District	S.No	Name	and a selection of the contract of the property of the contract of the contrac
<u>.</u>	Khair Muhammad	Bannu	27.		Home District
2	Qammar Zaman	Bannu	28.	Attiqullah	Charsadda
	Akbar Ali	Swat	29.	Khan Saddiq	Charsadda
	Bakht Afsar	Swar	* 30.	Salah-ud-Din	D.I.Khan
	Muzafar Iqbal	Peshawar	31.	Noor Muhammad	Malakand
	Alam Khan	Swat	32.	Taj Muhanunad	Mardan
	Haibat Khan	Bannu	33.	Muhammad Zahid	Mansehra
	Muhammad Yousaf	Abbottabad	···	Ilhamullah	Charsadda
	Muhammad Saleem	Peshawar	34.	Sajjad Hussain	Peshawar
)	Muhammad Sultan	Mansehra	35.	Muhammad Zahir	Charsadda
<u>.</u>	Sana Ullah	Charsadda	36.	Amir-ur-Reliman	Dir
	Hidayatullah	Charsadda	37.	Ubaid-ur-Rehman-I	Chitral
	Zar Badshah •	Peshawar	38.	Shah Farooq	Kohat
	Muhammad Jamshid	Peshawar	39.	Jalal-ud-Din	Malakand Agen
	Yar Muhammad	Swat	40.	Ubaid-ur-Rehman-II	Charsadda
.	Abdul Wadood	Chitral	41.	Gul Nawaz	Bannu
	Ali Murad		42,	Muhammad Pervez-II	Swat
	Khan Amir	Chitral	43.	Maqbali Khan	Peshawar
	Said Raza	Peshawar	44.	Ihsanullah	Charsadda
	Wajid Gul	D.I.Khan	45.	Javed Ali	Charsadda
	Zahirullah	Kohat	46.	Inamullah	
		Charsadda	47.	Abdul Aziz	Bannu
	Amjid Ali Shah	Peshawar	48.	Muqrab Alam Khan	Swat
	Muhammad Riaz	Peshawar	49.	Abdur Rauf	Mardan
	Saleem Akhtar	Haripur	50.	Tahseen Ullah	Lakki
	Shamsher Ali Shah	Mardan	51.	Riaz Muharnmad	Charsadda
. 1	Muhammad Nasser	Peshawar	52.	Abdul Aziz-II	Abbottabad
	··L //	\$ <del>**</del>		Augu! AZiZ-II	Mardan



## Office of the Inspector General of Police Khyber Pakhtunkhwa, Beshawar.

	·				
F53		Swat	93.	Jehanzeb	Peshawar
54.		Abbottabad	94.	Muhammad Idrees	Charsadda
55.		Haripur	95.	Aslam Khan	Peshawar
<i>,</i> 256.		Swat .	96.	Muhammad Khurshid	Abbottabad
57.	Naseer Ahmed	Peshawar	97.	Wajid Ali	Peshawar
58.	Ishting 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
54	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	1 i l.	S. Munawar Ali Shah	Peshawar
72.	Sikandar Khan	Kohat	112.	Fazal Wahab	Buner
73.	Zahid Ullah	Peshawai	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.	Alamzeb	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
			130.	Javed Ighal	Peshawar
1-90	-    Murtaza	i Mardan	1 (30).		
90.	Murtaza Muhammad Azhar	Mardan Swabi	130.	Javed Adodi	1 CSIIR VV DJ.

Note. Unwilling will be not accepted in any case.

SYED FIDA HASSAN SHAH

AIG/Establishment,
For Provincial Police Officer,
\*\*hyber Pakhtunkhwa, Peshawar.



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

Subject:

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

#### Notification

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.	Baklıt Afsar	Swat	10.	Muhammad Nascer	Peshawar
2.	Muzafar Iqbal	Peshawar	11.	Attigullah	Charsadda
3	Muhammad Saleem	Peshawar	12.	Khan Sadiq	Charsadda
4	Zat Bodshah	Peshawar 🦂	13.	Salah-ud-Din	D.I.khan
5	Khan Amir	Peshawar	[4]	Muhammad Zahir	Charsadda
<u> 6</u>	Said Raza	D.I.Khan	15.	Amir Rehman	Dir w
7.	Wajid Gul	Kohat	16.	Jalal-ud-Din	Malakand Agency
8.	Amjid Ali Shah	Peshawar	17.	Muhammad Porvez	Sivat
·).	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/-

(MJAN MUHAMMAD ASIF) Addl: IGP/Fleadquarters, For Inspector General of Police, Khyber Pakhtunkhwa,

Peshawar.

394-406

/CPB dated Peshawar the

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

- The Addl: Inspectors General of Police, HQRS: Special Branch, Investigation, and Elite Force Khyber Pakhtunkinga, Ceshnwar
- The Deputy Inspector General of Police, HQRS: Khyber Pakhtunkhwa, Peshawar.
- The Capital City Police Officer, Peshawat.
- The Deputy Inspector General of Police, Training Khyber Dakhtunkhwa, Peshawar
- The Dy: Inspectors General of Police, Mardan, Malakand and D.I.Khan Regions.
- The Registrar, CPO, Peshawar,
- The Supdt: Secret CPO Peshawar.
- The Supdi: Establishment -V CPO Peshawar.

Already received

 $\Delta {
m IG/fistablishment}_{\rm I}$ For Provincial Police Officer, Khyber Pakhttolkhwa, Peshawar.

## ACRS POSITION OF SENIOR CLERKS OF KHYBER PAKHTUNKHWA POLICE Annex-D

S.No.	Name of	Date of	Detachable		A	ACRs Positio	n ,		NOT AVAILABLE	
5.110.	Senior Clerk	Birth	Certificate	2011	2012	2013	2014	2015	ACRS	1
	Jemot Giora			2011	2012	Available	Available	Available		
	:			Available	Available 18.06.2012	05.03.2013	2014	2015	01.08.2011 to 31.12.2011	
1.	Akbar Ali	09.02.1963	NA	01.01.2011	1 1	to	2014	2013	01.01.2012 to 17.06.2012	
				to 30.07.2011	to 31.12.2012	02.07.2013			02.07.2013 to 31.12.2013	
		20.00.1062	\	01.01.2011	16.04.2012	01.01.2013	N.A	N.A	14.08.2011 to 31.12.2011	
2.	Haibat Khan	30.09.1963	NA	to	to	to	11112		01.01.2012 to 16.04.2012	
				13.08.2011	30.08.2012	06.03.2013			01.09.2012 to 31.12.2012	
				15.00.2011	30.00.2012		<b>~</b>		07.03.2013 to 31.12.2013	
					,				01.01.2014 to 31.12.2014	
					-				01.01.2015 to 31.12.2015	The state of the s
	Muhammad Yousf	06.01.1962	NA	NA	NA	12.08.2013	2014	2015	01.01.2011 to 31.12.2011	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
3	Munammad Yousi	06.01.1902	INA.	147		to			01.01.2012 to 31.12.2012	
						31.12.2013	-		01.01.2013 to 11.08.2013	
4.	Sanaullah	11.03.1963		2011	2012	2013	2014	2015	•	
			7.74	2011	2012	N.A	2014	04.04.2015	01.01.2013 to 31.12.2013	
5.	Abdul Wadood	09.03.1960	NA	Photocopy	Photocopy	13.71	2011	to	01.01.2015 to 03.04.2015	
		_		Photocopy	Тпососору			31.12.2015		
	1 413 4 4	04.01.1959	NA .	01.07.2011	2012	01.01.2013	2014	2015	01.01.2011 to 31.06.2011	
6.	Ali Murad	04.01.1939	INA .	to		to ·			11.04.2013 to 31.12.2013	:
				31.12.2011		10.04.2013				
7.	Zahir Ullah	10.05.1961		2011	2012	2013	2014	2015	•	
		02.07.1063	NA NA	NA	2012	NA	2014	NA	01.01.2011 to 31.12.2011	}
8.	Muhammad Riaz	02.07.1963	INA.	NA.					01.01.2013 to 31.12.2013	
<b>\</b>	-	1			i			, F	-01.01.2015 to 31.12.2015	and the second s
-	To: Milhammad	06.09.1969		201.1	2012	- 2013 -	2014	2015	The second secon	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1
9	Taj Muhammad -	00.09.1907			7					
10.	Muhammad	20.03.1963	NA	2011	2012	2013	NA ·	NA	01.01.2014 to 31.12.2014	
10.	1	20.03.1703		:	and administration to an extension	·· because	بيع المادي مراج ومستعملية دريان ساعد سا		01.01.2015 to 31.12.2015	
" " " " " " " " " " " " " " " " " " " "	Jamshed	1	j							1
11.	Muhammad Zahid	04.04.1968	NA	01.01.2011	NA	NA	NA	NA	06.04.2011 to 29.09.2011	İ
11.	Ivianianima Same		;	to	] -	-		-	01.01.2012 to 31.12.2012	
				05.04.2011	_				01.01.2013 to 31.12.2013	
	,			30.09.2011		. •			01.01.2015 to 31.12.2015	
	· · ·			to						
		,		31.12.2011	-					1
12.	Ilham Ullah	10.02.1963	<del>                                     </del>	2011	2012	2013	2014	2015	<u> </u>	]
		<u> </u>	<u> </u>	<u> </u>	1		<u> </u>			

C.t. C data

Chippers ASIFBA T1 App Data No cafi Temp (Rar S Dia 0.051 \Senior Clerks . docx Compt: 0.7

			•	C.	3			,	
93.	Ashraf Khan	30.04.1966	NA	NA	10.10.2012	01.01.2013	2014		01.01.2011 to 31.12.2011
			•		to	to			01.01.2012 to 09.10.2012
					31.12.2012	31.03.2013			01.04.2013 to 10.07.2013
1		•	1			11.07.2013	1		01.01.2015 to 31.12.2015
	٠,					to			•
						31.12.2013			
94	Akhtar Hussain	13.12.1964	-	2011	2012	2013	2014	2015	<u>-</u>
95.	Safdar Khan	20.04.1969	NA	01.01.2011	NA	NA	2014	NA	01.01.2012 to 31.12.2012
	He is awarded		1	to					01.01.2013 to 31.12.2013
	punishment			11.05.2011		ŀ			01.01.2015 to 31.12.2015
i	Reduction in Rank				-				
								<u> </u>	
96.	Hafiz Ullah	10.10.1972	. NA	2011	2012	2013	01.01.2014	-NA	27.06.2014 to 31.12.2014
ĺ		-					to		01.01.2015 to 31.12.2015
				Olima er ig	_		06.03.2014		
							13.03.2014		
							to		
<u></u>							26.06.2014		
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
	!				į				01.01.2013 to 31.12.2013
ļ <sup>*</sup>				. 1				}	01.01.2014 to 31.12.2014
101	NI-Janes Till-L	24.06.1970	NA I	2011	NT4	274	2014	374	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
		in an inches					almi murris, la	anguna e egy ge	01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014
									01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015
102.	Khaista Gul	03.01.1967	NA I	. NA	NA .	2013	2014	NA	01.01.2013 to 31.12.2013
.102.	Khaista Gui	03.01.1907	NA	. NA.	INA	2015	, 2,01,4	NA	01.01.2012 to 31.12.2012
,			• ]	f		į	,		01.01.2012 to 31.12.2012
103.	Sardar Ali	15.03.1971.	NA	NA	NA	NA NA	NA	NA	01.01.2013 to 31.12.2013
103.	Juigai 7th		143	1711	177		1773	747.	01.01.2011 to 31.12.2011
]		Ī	1		1	ŀ	-	İ	01.01.2012 to 31.12.2012
	·	1		}		·		ļ	01.01.2014 to 31.12.2014
					1		ļ		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

LX.C To

C:\Users\AS\F8A=1\AppDate\Locz\Temp\ResSD1e0.051\Senior Clerks docs Compt: 02

(24)
------

16	57.	Muhammad-	T 200	<del></del>		<u></u>	•			
10	,,,	Mushtag	27.06.1968	NA	NA	NA	NA	NA	NA	01.01.2011 to 31.12.2011
j		·	,	1						01.01.2012 to 31.12.2012
									}	01.01.2013 to 31.12.2013
Ì .		,	1						Į	01.01.2014 to 31.12.2014
16	8	Ghulam Mustafa	15.01.107	<del></del>						01.01.2015 to 31.12.2015
	9	Muhammad Arshad	15.01.197 18.12.1980	<del>                                     </del>	2011	2012	2013	2014	2015	-
		A STANKE OF A ST STANKE	1. 2.12.120.V.	. NA	2011	NA	NA	2014	NA ·	01.01.2012 to 31.12.2012
1	-					1	}	ł		01.01.2013 to 31.12.2013
İ	ł		ļ			!			-	01.01.2014 to 31.12.2014
170	0.	Javed Igbal	15.02.1971	<del></del>					}	01.01.2015 to 31.12.2015
171		Israr Ali	15.04.1978	NA NA	2011	2012	2013	2014	2015	
			13.04.1978	NA	01.01.2011	2012	2013	2014	2015	01.05.2011 to 07.08.2011
1	1	* * * * * * * * *			to		j	. –		
(1.E) .4'.	,	y			30.04.2011		1			
1.5	* E- 17		GSTM:	1 1 1	08.08.2011	e de la companya del companya de la companya del companya de la co		1		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
		·						1	A 50.15	The second second second
172		Saif-ur-Rahman	15.04.1973	NA	01.10.2011				<u> </u>	· l
1 .			13.04.1773	INA.	2011	NA	NA	NA.	NA NA	01.01.2012 to 31.12.2012
									İ	01.01.2013 to 31.12.2013
ł				1			1		1	01.01.2014 to 31.12.2014
173.		Ikram Ullah	09.04.19.76	1					1	01.01.2015 to 31.12.2015
174.		Sarfaraz Khan	15.04.1967	NA	- 2011	2012	2013	2014	2015.	-
1			15.04.1507	NA	2011	2012	01.11.2013	01.01.2014	2015	01.01.2013 to 30.10.2013
				[	,		to	" to		25.02.2014 to 31.12.2014
175.	]	Faisal Qamar	02.02.1977	NA	2011	2010	31.12.2013	24.02.2014		
ł		`	02.10,,,		2011	2012	2013	2014	01.01.2015	01.08.2015 to 31.12.2015
			}		~				to	
176.	F	Rafaqat Ali	28.08.1980		2011	2012	2012	1	31.07.2015	
-177.	N	Muhammad Afzal	- 01.01.1972	NA ·	2011	2012	2013	2014	2015	<u>-</u>
1	(	man _		. 1	2011	201-2	01.01.2013 to	NA -	NA	15.06.2013 to 31.12.2013 .
1	3	-vears)			* * * * * * * * * * * * * * * * * * * *	115 <b>7</b> 00 k	to 14.06.2013		-	01.01.2014 to 31.12.2014
.178.	. N	Muhammad Abid	10.03.1971					<u> </u>		01.01.2015 to 31.12.2015
179.		alak Naz	12.12.1966		2011	2012	2013	2014	2015	and the second of the second o
1	1		14.12.1900	NA	2011	2012	2013	01.01.2014	NA	01.07.2013 to 31.12.2013
1	ŀ	1				,		to	İ	01.01.2015 to 31.12.2015
180.	I H	laqiq-ui-Islam	01.03.1974	NA	2011		·	30.06.2014		
			01.03.1974	NA	2011	NA	NA ·	NA	NA	01.01.2012 to 51.12.2012
	1						. [		ł	01.01.2013 to 31.12.2013
} .	.		-		1	1	· .			01.01.2014 to 31.12.2014
181.	K	ishwar Ali	10.10.1974	NA	2011	2010				01.01.2015 to 31.12.2015
101.			2012U-17/4	IVA	2011	2012	01.01.2013	2014	2015	17.07.2013 to 31.12.2013
101.	ı	1	1				1			
101.		//					to 16.07.2013	İ		

12
C\Users\ASIFBA~1\AppData\Local\Temp\RarSDIa0.051\Senior Clorks .docx Compt: 02



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

Padocala

Amer E

The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar

31747 W. 195 14

PROPER CHANNEL

為可能的變化

REPRESENTATION FOR REVISED SENIORITY

Respected Sir,

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

#### It is submitted that:-

- 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.
- En 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

Encls: (02)

ufease.

Yours Obediently,

(Hussain ali) Sonior 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

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.



### BEFORE WORTHY PROVINCIAL POLICE OFFICER, KHYBER PAKHTUNKHWA, PESHAWAR

Through:

PROPER CHANNEL

Subject
Respected Sir.

REQUEST FOR FIXING OF SENIORITY

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 foname.

 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)
Senior Clerk

DPO Office Dir Lower Dated 10/08/2017





## OFFICE OF THE DISTRICT POLICE OFFICER DIR LOWER

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

E-mail: <u>dpolowerdir@gmail.com</u>

No. 20251/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:-( | 7 )

District Police Officer, Dir Lower.

e t. C

ic



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

No	79-	/CPB,	dated Peshawar the 13/ 0	9 / 2017

-		
Τφ:	The	Addi: Inspectors General of Police, Special Branch, Elite Force, Investigation
	•	and Operations Khyber Pakhiunkhwa, Peshawar,
	L-The	Capital City Police Officer, Peshawar.
i	The	Density Inspector Career, Conference
	1	Deputy Inspectors General of Police, Enquiry & Inspections, CTD, Traffic and
!	~.	Thurst B. Philyper Pakhiunkhwa. Peshawar
1	The	REHIONAL POLICE UTILICETS, Mardan Hazara Malabana Volice
į		Banitu and D.I. Khan Regions.
!	The	Commandant, Frontier Reserve Police,
ļ		Khulman Balalana itan
	<b>1</b> 171	Khyber Pakitunkhwa, Peshawar
!	The	Commandant, Police Training College, Hangu.
į.	The	Assistant Inspectors General of Police Legal & BDU, Khyber Pakhtunkhwa.
	The	Director, CPC, Khyber Pakhtunkhwa, Peshawar.
! .	The	Director EST Wild Pacifichina, resnawar.
i	The	Director, FSL, Khybor Pakhtunkhwa, Peshawar.
1		Budget Officer, CPO Peshawar
1	The	Deputy Supdi: of Police, PQR, Khyher Pakhtunkhwa, Peshawar.
ì	All	Branches in CPO, Poshawar.
i .		

Subject: Memo:

#### NO DEPARTMENTAL ENOURY CERTIFICATE

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

i.NO	NAME	S.NO	NAME
1.	Mulianimed Ighal	21.	Abdur Rauf
2.	Akbar Ali	22.	Tehspenuliah
3.	Halbat Khan	23.	Nadeem Ahmed
4.	Muhammad Youanf	24.	Riaz Muhemmad
5.	Sannaullah	25.	Waheed or Reliman
б.	Ali Murad	26.	Nizaka: Khan
7.	Zahirullah	27.	Nascer Ahmad
8,	Muhammad Riaz	28.	Ishtiaq Hussein
9.	Taj Muhaminad	29.	Muhammad Hamayun
10.	Muhammad Jamehid	30.	Muhammad Ramzan
H.	Muhainmad Zahid	31.	Shafaqat Hayat
12.	Ilhamullah	32.	Hag Newsz
13.	Sajjad Hossein	33.	Muhammad Javed
14.	Slish Faroog	34.	Muhammad Aslam
15.	Theanullah	35.	Dilder Husseln
16.	Javed All	36.	Muhainmad Fahim
17.	Inamuliah	37.	Amjed
18.	Abdul Aziz	38.	Muhammad Tayyub
19,	Sallad Anwar	39.	Muhammad Yousaf
20,	Muqarrab Alam	40.	Muhammed Ishtiag

HP LASERJET FAX



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

dated Peshawar the 73/ 09 / 2017 /CPB, No.

1401		
		NAME
	S.NO	Trained
NAME	51,	Muhammad Iranad
S.NU		Farmanullah
41. Sardar Alam	52.	Minhah ud Din
Sikandar Milati	53.	VI II II II II II II II II II II II II I
Zahidullaii	54.	All Asghar
Land Wall Maker	55.	Israr A I
44. Abdul Hakin 45. Muhammad Nasir		Abdul Wadcod
45. Muhammao Nu	56.	Hayat Ullah
46. Muhammad Riaz	57,	Flayartin
47. Inayatulia	58.	Muriaza
		Muhammad Azhar
48. Sibgilaturial	59.	Rohmai Ullah
49. Alainzeh	60.	Kenna
50. Muhammad Bashir		
The state of the s		

AIG/Establishment For Inspector General of Police, Khyber Pakhtunkhwa. Peshawar.

#### Endstr No. and deted oven

1. Addl: Inspector General of Police, Headquarters, Khyber Pakhtunkhwa, Peshawar. Copy forwarded to the:-

2. Deputy Inspector General of Police, HQrs:, Khyber Pakhtunkhwa, Peshawar.

3. PSO to Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

Supdt: Secret, CPO Peshawar to provide synopsis of the above named Sonior Clerks to 4. Registrar, CPO, Peshawar.

Career Planning Branch CPO. 6. Supdt: Establishment-V, CPO, Peshawar,

EC/ sel DPO3 + All S. P. /nv: Fresh No. departmental Enquiry Cartificate in respect Senior clerks of your respective district / unit in Connection with Their promotion as Asset. Grade in Connection with Their promotion as Asset. Clerk may be furnished to at the earliest please Regional Police Officer, Moleyman 3 2017 Swall

> District Police Office? Oir Lower at Timergars.

2017 15:22 FAX 0819210927

PPO KPK PESHAWAR

@j001



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

Ph; 091-9210545 Fax: 091-92:0927 E-Mail: - 05EstabV@gmail.com

Dated, Peshawar the 8-1/ Nov. 2017

#### ORDER.

promotion the following transfer/posting amongst stant Grade Clerks (BPS-1.6) as noted against their names are hereby ordered with ediate effecti-

hate errecu-	FRON	10
Mame Mr. Muhammad Yousal Mr. Sana Ullah Mr. Zahir Ullah Mr. Taj Muhammad Mr. Taj Muhammad Mr. Miham Ullah Mr. Naimat Ullah Mr. Naimat Ullah Mr. Sajjad Hussain Mr. Ihsan Ullah Mr. Javed Ali	RPO office Hazara  Special Branch, KPK  Peshawar  CCPO office Peshawar  Invest: Wing Nowshehra  DPO office Mansehra  CPO, Rek Peshawar  CPO, Peshawar  DPO office Peshawar  DPO office Charsadda	RPO office Huzara Special Branch, KPK Peshawar CCPO office, Peshawar. Invest: Wing, Nowshahra. DPO office Mansahra. DPO office Charsadda Spl: Branch KPK, Peshawar. CTD KPK, Peshawar. CPO, Peshawar. Operations Branch, CPO Peshawar. FRP/ Hazara Range.
11. Mr. Inam Ullah 12. Mr. Sajjad Anwar 33. Mr. Muqarcab Alam Kha	PRP/Hazara Range DPO office Kohat  RPO/Mardan	Fraffic, School Kohat (He will draw pay from PTC Hangu) PDRM, Mardau CCPO office Peshawar
14. Mr. Abdur Rauf 15. Mr. Tehseen Ullah	CCPO office Peshawar CPO, Peshawar	SP/FRP Poshawac Range CPO, Poshawac
16. Mr. Nadeem Ahmad 17. Mr. Riaz Muhammad (18) Mr. Nizakat Khan 19. Mr. Naseer Ahmad	CPO, Peshawar  PRP/Hazara Range  RPO office Hazara  SSP/Traffic office, Pash	FRP/Hazara Range RPO office Hazara. SSP/Fraffic office, Poshawar
20. Mr. Ishtiaq Hussain	DPO office Charsadda	RPO office Mardan.

は一次の

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

la,

lan.

העופה · lister :unkh war.

www.mspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar.

- · Accountant General Khyber Pakhtunkhwa.
- Commandant PTC Hangu.
- · Deputy Inspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspectors General of Police, Special Branch, CTD, and Operations
   Khyber Pakhtunkhwa, Peshawar.
- · Regional Police Officers, Hazara & Mardan.
- · Capital City Police Officer, Peshawar.
- District Police Officers, Manschra, Charsadda, and Kohat.
- Assistant Inspector General of Police Estt: CPO Peshawar.
- SP/Inv: Wing, Nowshehra.
- SP/FRP Hazara Range.
- SP/PRP Poshawar Range.
- District Accounts Officers, Abbottbad, Mansehra, Novishehra, Charsadda,
   Kohal, & Mardan.
- Director Police School of Public Disorder and Riot Management, Mardan.
- Registrar CPO Peshawar.
- Office Supdit: Secret Branch, CPO Peshawar.
- · Accountant, CPO Peshawar.

· Office Supdit: Central Registry Cell CPO, Peshawar.

(Arthumbae Khan) PSF AIG/Establishment,

For Inspector General of Police,

, / Khyber Pakhtunkhwa,

Peshawer.

570117

C.T.C.
Advocato



### 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,

6.00

(HUSSAIN AU)

Senior Clerk, DPO Office, Dir Lower

Dated 20/02/2018

C.t. C Advocate

> District Police Official Dir Lower at Timergars



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



Ph#.0945-9250005 Fax#. 0945-9250049 E-mail: dpolowerdir@gmail.com

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

The Regional Police Officer,

Malakand at Saidu Sharif, Swat

Subject:

<u>APPLICATION</u>

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





#### OFFICE OF THE

#### ICE OFFICER, MALAKAND

AT SAIDU SHARIF SWAT.

Ph: 0946-9240381-83 & Fax No. 0946-9240390 Email: digmalakand@yahoo.com

\_\_\_\_/E, dated Saidu Sharif the The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar. To:

Subject:

APPLICATION.

<u> Memorandum:</u>

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.

C.T.C

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

Olstrict Police Officer; Dir Lower at Timergara.





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

#### PESHAWAR

Ph: 091-9210545 Fax: 091-9210927 E . OSEstab V@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 Waneed-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, Knyber 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.
- 23. Regional Police Officer, Malakand.
  - 4. District Police Officer, Dir Lower w/r to his office letter No. 34692/EB, dated 15.19.2018 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 Supdit: Secret, CP Branch & Central Registry Cell CPO, Peshawar.

C+ C

Office dypdt For: Regional Police Officent Malakand, at Saidu Sharif Swale

For alactor

Morady geraved vide

To,

The worthy Inspector General of Police,

Khyber Pakhtunkhwa, Peshawar

Through

**PROPER CHANNEL** 

Sübiect:

APPLICATION FOR PROMOTION AS ASSISTANT GRADE CLERK WITH

**BACK BENEFITS** 

#### Respected Sir.

It is submitted that:-

- 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.

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:

Page 1 of 3

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.

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,

L. T. C.
Adolesta

Page 2 of 3



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) Senior Clerk,

Region Office, Swat Dated 09/07/2019

C.T.C.
Advocato





## 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 // / 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.

Eneli-(24)

Regional Police Officer, Malakand Region Swat

C.t.C Davocate BE PAKHTUNKHWA TION IN THE KH FOR PUBLICA OLICE GAZETTE PART-II, ORDERS BY THE INSPECTOR GENERAL OF POLICE KHYBER

PAKHTUNKHWA PESHAWAR

Dated Peshawar/ 7/09/2019

/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, Knyber Pakhtunkhwa, the following Senior Clerks (BS-14) are hereby promoted as Assistant Grade Clerks (BS-16), with immediate effect:-

Oy: Inspector General Of Police Fraight, Khyber Pakhtunkhwa, Peshann

<70 Y

2. Shah Farooq SP/FRP Kohat Range 3. Waheed-ur-Rehman RPO Office Hazara 4. Hussain Ali RPO Office Malakand 5. Muhanimad Hamayun SP/Investigation Office D.I Khan 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 17. Farmanullah SP/Investigation Office Swat 18. Minhaj-ud-Din Budget Branch CPO 19. Ali Asghar CCP Office Peshawar 20. Israr Ali Police School of Tactics Peshawar 21. Ahdul Wadood CCP Office Peshawar 22. Murtaza DPO Office Nowshera 23. Muhammad Azhar DPO Office Nowshera 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 Asharf DPO Office D.I Khan 28. Basher Ahmad CPO Office Peshawar 29. Muhammad Asharf DPO Office D.I Khan 31. Sher Zanfin do J 32. Amreez Khan DPO Office Buner 33. Syed Munawar Ali Shah SP/Investigation Office Buner 34. Fazal Wahab DPO Office Buner 35. Tariq Hameed SP/Inv: Office Abbottabad 36. Arbab Inam Ullah Jan Operations Branch CPO	S. NO.	NAME	PRESENT POSTING
2. Shah Farooq 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 Co.I Khan 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. Ahdul Wadood CCP Office Peshawar 22. Murtaza DPO Office Nowshera 23. Muhammad Azhar DPO Office Nowshera 24. Jehanzeb Elite Force CPO 25. Muhammad Idrees Commandant FRP Office Peshawar 26. Wajid Ali CCP Office Peshawar 27. Ikrarh Ullah DPO Office Peshawar 28. Basher Ahmad CCP Office Peshawar 29. Muhammad Ashraf DPO Office Peshawar 29. Muhammad Ashraf DPO Office Buner 30. Daud Shah SP/Investigation Office Buner 31. Sher Zanfin -do- 32. Amreez Khan DPO Office Buner 33. Syed Munawar 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	.1/	Akbar Ali	DI C Canaca
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. Akdul Wadood CCP Office Peshawar 22. Mutaza 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 D.I Khan 28. Basher Ahmad CCP Office Peshawar 29. Muhammad Ashraf DPO Office D.I Khan 29. Muhammad Ashraf DPO Office D.I Khan 20. Daud Shah SP/Investigation Office Buner 20. Jang Shah SP/Investigation Office Buner 21. Amreez Kham DPO Office Buner 22. Amreez Kham DPO Office Buner 23. Syed Munawar Ali Shah SP FRP Office Peshawar 24. Fazal Wahab DPO Office Buner 25. Tariq Hameed SP/Inv: Office Abbottabad 26. Arbab Inam Ullah Jan Operations Branch CPO		Shah Farooq	
4 Hussain Ali 5. Muhammad Hamayun 6. Muhammad Ramzan 7. Shafqat Hayat 8. Muhammad Javed 9. Dildar Hussain 10. Amjad 11. Sikandar Khan 12. Zahid Ullah 13. Abdul Hakim 14. Muhammad Nasir 15. Muhammad Nasir 16. Inayat Ullah 17. Farmanullah 18. Minhaj-ud-Din 19. Ali Asghar 20. Israr Ali 21. Ahdul Wadood 22. Murtaza 23. Muhammad Azhar 24. Jehanzeb 25. Muhammad Idrees 26. Wajid Ali 27. Ikrarh Ullah 28. Basher Ahmad 29. Muhammad Ashar 20. Dro Office Peshawar 20. Muhammad Rasa 21. Ahdul Wadood 22. Murtaza 23. Muhammad Rasa 24. Jehanzeb 25. Muhammad Idrees 26. Wajid Ali 27. Ikrarh Ullah 28. Basher Ahmad 29. Muhammad Ashar 29. Muhammad Ashar 29. Muhammad Ashar 29. Muhammad Ashar 20. Dro Office Peshawar 21. Ahgul Wadood 22. Murtaza 23. Muhammad Idrees 24. Jehanzeb 25. Muhammad Idrees 26. Wajid Ali 27. Ikrarh Ullah 28. Basher Ahmad 29. Muhammad Ashar 29. Muhammad Ashar 31. Sher Zamin 32. Amreez Khan 33. Syed Munawar Ali Shah 34. Fazal Wahab 35. Tariq Hameed 36. Arbab Inam Ullah Jan 37. Operations Branch CPO 38. Prinvestigation Office Buner 39. Sprinvestigation Office Buner 30. Doordice Buner 31. Sprinvestigation Office Buner 32. Amreez Khan 33. Sprinvestigation Office Buner 34. Fazal Wahab 35. Tariq Hameed 36. Arbab Inam Ullah Jan 36. Operations Branch CPO			
5. Muhammad Harnayun 6. Muhammad Ramzan 7. Shafqat Hayat 8. Muhammad Javed 9. Dildar Hussain 10. Amjad 11. Sikandar Khan 12. Zahid Ullah 13. Abdul Hakim 14. Muhammad Riaz 15. Muhammad Riaz 16. Inayat Ullah 17. Farmanullah 18. Minhaj-ud-Din 19. Ali Asghar 19. Ali Asghar 20. Israr Ali 21. Ahdul Wadood 22. Murtaza 23. Muhammad Azhar 24. Jehanzeb 25. Muhammad Idrees 26. Wajid Ali 27. Ikram Ullah 28. Basher Ahmad 29. Muhammad Ashraf 20. Drice Peshawar 20. Israr Mil 21. Ahdul Wadood 22. Murtaza 23. Muhammad Idrees 24. Jehanzeb 25. Muhammad Idrees 26. Wajid Ali 27. Ikram Ullah 28. Basher Ahmad 29. Muhammad Ashraf 20. Drice Peshawar 21. Karam Ullah 22. Murtaza 23. Muhammad Idrees 24. Jehanzeb 25. Muhammad Idrees 26. Wajid Ali 27. Ikram Ullah 28. Basher Ahmad 29. Muhammad Ashraf 29. Muhammad Ashraf 29. Muhammad Ashraf 29. Muhammad Ashraf 29. Muhammad Ashraf 29. Muhammad Ashraf 29. Muhammad Ashraf 29. Muhammad Ashraf 29. Muhammad Sp/Investigation Office Buner 29. Muhammad Ashraf 29. Muhammad Sp/Investigation Office Buner 20. Sp/Investigation Office Buner 21. Sp/Investigation Office Buner 22. Murtaza 23. PPO Office Peshawar 24. Jehanzeb 25. Muhammad Ashraf 26. Wajid Ali 27. Ikram Ullah 28. Basher Ahmad 29. Muhammad Sp/Investigation Office Buner 29. Muhammad Ashraf 29. Muhammad Sp/Investigation Office Buner 20. Jehanzer 21. Sp/Investigation Office Buner 22. Murtaza 23. Sp/Investigation Office Buner 24. Jehanzer 25. Muhammad Sp/Investigation Office Buner 26. Wajid Ali 27. Ikram Ullah 28. Basher Ahmad 29. Muhammad Sp/Investigation Office Buner 29. Muhammad Ashraf 29. Muhammad Sp/Investigation Office Buner 29. Muhammad Sp/Investigation Office Buner 29. Muhammad Sp/Investigation Office Buner 20. Jehanzer 20.		Hussain Ali	RFO Office totaluxuixu
6. Muhammad Ramzan 7. Shafqat Hayat 8. Muhammad Javed 9. Dildar Hussain 10. Amjad 11. Sikandar Khan 12. Zahid Ulah 13. Abdul Hakim 14. Muhammad Nasir 15. Muhammad Riaz 16. Inayat Ullah 17. Farmanullah 18. Minhaj-ud-Din 19. Ali Asghar 20. Israr Ali 21. Ahdul Wadood 22. Murtaza 23. Muhammad Azhar 24. Jehanzeb 25. Muhammad Azhar 26. Wajid Ali 27. Ikram Ullah 28. Basher Ahmad 29. Muhammad Riaz 20. CP Office Peshawar 20. Shafqat Wahab 20. Shafqat Walah 21. Ahdul Wadood 22. Murtaza 23. Muhammad Azhar 24. Jehanzeb 25. Muhammad Azhar 26. Wajid Ali 27. Ikram Ullah 28. Basher Ahmad 29. Muhammad Ashraf 20. Johan Muhammad Ashraf 2		Muhammad Hamayun	
7. Shafqat Hayat  8. Muhammad Javed  9. Dildar Hussain  10. Amjad  11. Sikandar Khan  12. Zahid Ullah  13. Abdul Hakim  14. Muhammad Nasir  15. Muhammad Nasir  16. Inayat Ullah  17. Farmanullah  18. Minhaj-ud-Din  19. Ali Asghar  20. Israr Ali  21. Ahdul Wadood  22. Murtaza  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Idrees  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Rias  20. Shafqat Alia  20. Shafqat Alia  21. Abdul Wadood  22. Murtaza  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Azhar  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Shafaf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Shafaf  29. PO Office Buner  31. Sher Zanfiin  32. Amreez Khan  33. Syed Munawar Ali Shah  34. Fazal Wahab  35. Tariq Hameed  36. Arbab Inam Ullah Jan  Operations Branch CPO	· L		SP/Investigation Office D.I Khan
9. Dildar Hussain 10. Amjad DPO Office Torghar 11. Sikandar Khan SP/FRP Kohat Range 12. Zahid Ullah DPO Office Peshawar 13. Abdul Hakim DPO Office Swabi 14. Muhammad Nasir Audit Cell CPO 15. Muhammad Riaz CCP Office Peshawar 16. Inayat Ullah 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. Abdul Wadood CCP Office Peshawar 22. Murtaza DPO Office Nowshera DPO Office Nowshera DPO Office Nowshera DPO Office Peshawar 23. Muhammad Azhar DPO Office Nowshera DPO Office Peshawar 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 DPO Office D.I Khan CP Office Peshawar DPO Office D.I Khan CP Office Peshawar DPO Office D.I Khan		Shafqat Hayat	SP/Investigation 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. Abdul Wadood CCP Office Peshawar  22. Murtaza DPO Office Nowshera  23. Muhammad Azhar DPO Office Nowshera  24. Jehanzeb Elite Force CPO  25. Muhammad Idrees Commandant FRP Office Peshawar  26. Wajid Ali CCP Office Peshawar  27. Ikrarh 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 Munawar 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	8.	Muhammad Javed	
11. Sikandar Khan  12. Zahid Ullah  13. Abdul Hakim  14. Muhammad Nasir  15. Muhammad Riaz  16. Inayat Ullah  17. Farmanullah  18. Minhaj-ud-Din  19. Ali Asghar  20. Israr Ali  21. Ahdul Wadood  22. Murtaza  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Idrees  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  20. Israr Ullah  21. Oppo Office Peshawar  22. CCP Office Peshawar  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Idrees  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Spylinvestigation Office Buner  30. Daud Shah  31. Sher Zanfin  32. Amreez Khan  33. Syed Munawar Ali Shah  34. Fazal Wahab  35. Tariq Hameed  36. Arbab Inam Ullah Jan  Deroffice Abdottabad  Operations Branch CPO	9.	Dildar Hussain	
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. Aḥdul 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 Munawar 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	10.	Amjad	
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. Abdul 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 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 Munawar 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	11.	Sikandar Khan	
14. Muhammad Nasir  15. Muhammad Riaz  CCP Office Peshawar  CCP Office Peshawar  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. Ahdul Wadood  CCP Office Peshawar  22. Murtaza  DPO Office Nowshera  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  32. Amreez Khan  DPO Office Buner  33. Syed Munawar Ali Shah  SP FRP Office Peshawar  DPO Office Buner  34. Fazal Wahab  DPO Office Buner  SP/Inv: Office Abbottabad  36. Arbab Inam Ullah Jan  Operations Branch CPO	12.	Zahid Ullah	
15. Muhammad Riaz  CCP Office Peshawar  16. Inayat Uilah  17. Farmanullah  18. Minhaj-ud-Din  19. Ali Asghar  20. Israr Ali  21. Ahdul Wadood  22. Murtaza  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Idrees  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  20. Office Peshawar  20. Office Peshawar  21. Ahdul Wadood  22. Murtaza  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Idrees  COP Office Peshawar  CCP Office Peshawar  CCP Office Peshawar  CCP Office Peshawar  CCP Office Peshawar  CCP Office Peshawar  CCP Office Peshawar  CCP Office Peshawar  CCP Office Peshawar  CCP Office Peshawar  DPO Office D.I Khan  CCP Office Peshawar  DPO Office Upper Dir  30. Daud Shah  SP/Investigation Office Buner  31. Sher Zamin  -do-  32. Amreez Khan  DPO Office Buner  33. Syed Munawar Ali Shah  SP FRP Office Peshawar  DPO Office Buner  34. Fazal Wahab  DPO Office Buner  SP/Inve Office Buner  SP/Inve Office Buner  SP/Inve Office Buner  SP/Inve Office Buner  SP/Inve Office Buner  SP/Inve Office Buner  Operations Branch CPO	13.	Abdul Hakim	
SP/Investigation Office Swat	14.	Muhammad Nasir	
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.   Ahdul 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 Munawar 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	15.	Muhammad Riaz	
17. Farmanullah  18. Minhaj-ud-Din  19. Ali Asghar  20. Israr Ali  21. Abdul Wadood  22. Murtaza  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Idrees  26. Wajid Ali  27. Ikrarh Ullah  28. Basher Ahmad  29. Muhammad Ashraf  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Delta Peshawar  20. Del	I	Inayat Ullah	
19. Ali Asghar  20. Israr Ali  21. Ahdul Wadood  22. Murtaza  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Idrees  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  20. De Office Peshawar  20. De Office Buner  20. Muhammad Ashraf  20. De Office Buner  20. Muhammad Ashraf  20. De Office Buner  20. De Office Buner  20. De Office Buner  20. De Office Buner  20. De		Farmanullah	DPO Office Nowshera
19. Ali Asghar CCP Office Peshawar  20. Israr Ali Police School of Tactics Peshawar  21. Ahdul 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 Munawar 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		Minhaj-ud-Din	
20. Israr Ali 21. Abdul Wadood 22. Murtaza 23. Muhammad Azhar 24. Jehanzeb 25. Mubammad Idrees 26. Wajid Ali 27. Ikram Ullah 28. Basher Ahmad 29. Muhammad Ashraf 29. Office Buner 20. Sp/Investigation Office Buner 20. Sp/Investigation Office Buner 21. Sp/Investigation Office Buner 22. Sp/Investigation Office Buner 23. Syed Munawar Ali Shah 24. Jehanzeb 25. Muhammad Idrees 26. Wajid Ali 26. Sp/Investigation Office Buner 27. Ikram Ullah Jan 28. Basher Ahmad 29. Muhammad Ashraf 29. Muhammad Ashraf 29. Muhammad Ashraf 29. DPO Office Buner 20. Sp/Investigation Office Buner 20. Sp/I			
22. Murtaza  23. Muhammad Azhar  24. Jehanzeb  25. Muhammad Idrees  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  21. Sher Zanfin  22. Amreez Khan  23. Amreez Khan  24. Jehanzeb  25. Muhammad Ashraf  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Muhammad Ashraf  29. PO Office Upper Dir  20. John Shah  20. Sp/Investigation Office Buner  21. Sher Zanfin  22. Amreez Khan  23. Syed Munawar Ali Shah  24. Fazal Wahab  25. Tariq Hameed  26. Wajid Ali  27. Ikram Ullah Jan  28. Basher Ahmad  29. Muhammad Ashraf  29. Muhammad Ashraf  29. Office Peshawar  29. Po Office Buner  20. John Sprand Peshawar  20. John Sprand Peshawar  20. John Sprand Peshawar  21. John Sprand Peshawar  22. John Sprand Peshawar  23. Syed Munawar Ali Shah  24. Jehanzeb  25. John Sprand Peshawar  26. Wajid Ali  26. John Sprand Peshawar  27. Ikram Ullah Jan  28. Basher Ahmad  29. Muhammad Ashraf  29. Muhammad Ashraf  29. DPO Office Buner  20. John Sprand Peshawar  20	20.		
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 Munawar 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	- 21.	Abdul Wadood	CCP Office Peshawar
24. Jehanzeb  25. Muhammad Idrees  26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  30. Daud Shah  31. Sher Zanfin  32. Amreez Khan  33. Syed Munawar Ali Shah  34. Fazal Wahab  35. Tariq Hameed  36. Arbab Inam Ullah Jan  27. Elite Force CPO  28. Commandant FRP Office Peshawar  29. CP Office Peshawar  DPO Office Upper Dir  30. SP/Investigation Office Buner  31. Sher Zanfin  32. Amreez Khan  33. Syed Munawar Ali Shah  34. Fazal Wahab  35. Tariq Hameed  36. Arbab Inam Ullah Jan  DPO Office Abbottabad  Operations Branch CPO	22.	Murtaza	
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 Munawar 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	23.	Muhammad Azhar	
26. Wajid Ali  27. Ikram Ullah  28. Basher Ahmad  29. Muhammad Ashraf  30. Daud Shah  31. Sher Zanfin  32. Amreez Khan  33. Syed Munawar Ali Shah  34. Fazal Wahab  35. Tariq Hameed  36. Arbab Inam Ullah Jan  CCP Office Peshawar  DPO Office Upper Dir  DPO Office Buner  SP/Investigation Office Buner  DPO Office Buner  SP/Investigation Office Buner  OPO Office Buner  SP/Investigation Office Buner  OPO Office Peshawar  DPO Office Peshawar  DPO Office Buner  OPO Office Buner  SP/Investigation Office Abbottabad  Operations Branch CPO	24.	Jehanzeb	
27. Ikram Ullah  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 Munawar 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	25.	Muhammad Idrees	
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 Munawar 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	26.	Wajid Ali	100
29. Muhammad Ashraf  DPO Office Upper Dir  30. Daud Shah  SP/Investigation Office Buner  31. Sher Zanfin  32. Amreez Khan  DPO Office Buner  33. Syed Munawar 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	27.	Ikram Ullah	DPO Office D.I Khan
30. Daud Shah  SP/Investigation Office Buner  31. Sher Zanfin  -do-  32. Amreez Khan  DPO Office Buner  33. Syed Munawar Ali Shah  SP FRP Office Peshawar  34. Fazal Wahab  DPO Office Buner  35. Tariq Hameed  SP/Inv: Office Abbottabad  Operations Branch CPO	28.	Basher Ahmad	CCP Office Peshawar
31. Sher Zanfin -do- 32. Amreez Khan DPO Office Buner 33. Syed Munawar 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	, 29.	Muhammad Ashraf	
32. Amreez Khan DPO Office Buner 33. Syed Munawar 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		Daud Shah	SP/Investigation Office Buner
33. Syed Munawar Ali Shah SP FRP Office Peshawar  34. Fazal Wahab DPO Office Buner  35. Tariq Hameed SP/Inv: Office Abbottabad  36. Arbab Inam Ullah Ian Operations Branch CPO	31.	Sher Zanfin	-do- ✓
33. Syed Munawar 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	32.	Amreez Khan	
35. Tariq Hameed SP/Inv: Office Abbottabad 36. Arbab Inam Ullah Jan Operations Branch CPO		Syed Munawat Ali Shah	
36. Arbab Inam Ullah Jan Operations Branch CPO	34.	Fazal Wahab	DPO Office Buner
	35.	Tariq Hameed	SP/Inv: Office Abbottabad
37 Sobail Ahmad CCP Office Peshawar	36.	Arbab Inam Ullah Jan	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
37. Solidii Alimad	37,	Sonail Ahmad	CCP Office Peshawar



#### 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 Nacem 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.I 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
50.	TATALOGUE AND AND AND AND AND AND AND AND AND AND	·

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 extendable for another one year in terms of Section-6 (02) of Khyber Pakhtunkhwa, Civil Servant Act-197 read with Rules-15 (01) of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotio

and Transfer) Rules, 1989. Their promotion will take effect from the date they actually assume the charge of their highe

responsibilities.

Sd/-Muhammad Naeem Khan Dr.PSP Inspector General of Police Khyber Pakhtunkhwa, Peshawar.

#### Endst: No. and dated even.

Copy forwarded to the:-

Addi: 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, Pashawar.

Deputy Inspector General of Police, HQrs, Khyber Pakhtunkhwa Peshawar.

Capital City Police Officer, Peshawar.

Commandant FRP Klyber 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, Kliyber 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.

(SADIQ BALOCE) PSP AIG/Establishment,

For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

17 2019 3:48PM DIG TRAINING OFFICE PESH 0919211268

Annex-1

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

#### 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 intervalia 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 C Regional Franciscos 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 Page 1 of 2



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.

Yours Obediently,

(HUSSAIN ALI)

Assistant Grade Clerk, Region Office, Swat Dated 27/09/2019





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

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

Email: ebmalakandregion@gmail.com

No. 13237 /E, dated Saidu Sharif the \_\_\_\_\_\_ 09 1 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 Flussain 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 Assistant Grade Clerk with his colleagues is sent-herewith for consideration please.

Encls: -(29)

Regional Police Officer, Malakand Region Swat

L'A L'O COLLA

بعدالت منا- سروس مرسورا جزئر تو تو المناع لسناه ر الركب ورساله الموسور المرسوس مرسورا جزئر تو تو المناع السناه ر الركب ورساله الموسور المرسوس الميلوس

مقد مہ سند رج عنوان بالا بیں اپ طرف ہے واسطے پیر دی وجواب دبی وکل کا روائی متعلقہ آن مقام کیرے کو رف کو رف کو رف کو روائی کا کا ل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ مقرر کرنے اقر ارکیا جاتا ہے کہ جاحب موصوف کو مقد مہ کی کل کا روائی کا کا ل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ وتقر راالت وفیصلہ برحلف دینے جواب دہیا درا قبال دعوی اور درخواست برقتم کی تقد بین زراوراس پرد شخط کرنے کا اختیار ہوگا۔ نیز بصورتعدم پیروی یا ڈگری ایک طرف ائیل کی برا مدگی اور منسوخ فیکورے کھل یا بردویکاروائی کے واسطے اور دکیل یا مختار قانونی کواپی ہمراہ یا ہی بجائے تقر رکا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ فیکورہ بالا اختیارات حاصل ہونے اور اسکا ساختہ برواختہ منظور و تبول ہوگا۔ اور دوران مقد مہ میں جو تم چو ہرجانہ التوائی مقام دورہ پر ہویا صدے باہر ہوقا صاحب ہونے نیز بقایا و ترچ کی وصولی کرتے وقت کا بھی اختیارہ وگا۔ اگر کوئی تاریخ پیٹی مقام دورہ پر ہویا صدے باہر ہوقو وکیل صاحب بابند نہ ہونے کی پیروی مقدمہ فیکورلہذاوکالت نامہ کی دیا کہ سند رہے المرقوم کی المرقوم کی المرقوم کی المرقوم کی کر جو رک کی مقدمہ فیکورلہذاوکالت نامہ کی دیا کہ سند رہے المرقوم کی کر دیا گئی مقام دورہ پر ہونے کہ سند رہے المرقوم کی کر دیا گئی مقام دورہ کی مقدمہ فیکورلہذاوکالت نامہ کی دیا کہ سند رہے المرقوم کی دیا کہ سند رہے المرقوم کی دیا کہ سند رہے المرقوم کی دیا کہ سند رہے المرقوم کی کر دیا گئی دیا کہ سند رہے المرقوم کی دیا کہ سند رہے المرقوم کی دیا کہ سند رہے دیا کہ سند رہے کا کر کر دیا گئی دیا کہ سند رہے کر کر دیا کہ سند کر کر کر دیا گئی دیا کہ سند رہے کر کر دیا کہ سند کر کر دیا گئی دیا کہ سند کر دیا کہ سند کر کر دیا کہ سند کر کر دیا گئی دیا کہ سند کر کر دیا گئی دیا کہ سند کر کر دیا گئی دیا کہ سند رہے کر کر دیا کہ سند کر کر دیا گئی دیا کہ سند کر دیا کہ سند کر کر دیا کہ سند کر کر دیا کہ سند کر کر دیا گئی دیا کہ سند کر کر دیا کہ سند کر کر دیا کہ سند کر کر کر کر دیا گئی دیا کر کر دیا کہ کر کر دیا گئی دیا کہ کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر دیا کر کر کر دیا کر کر کر دیا کر کر دیا کر کر دیا کر کر کر دیا کر کر دیا کر کر کر کر

#### 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
******	• • • •	Аррецаци

#### VERSUS

Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others

.....Respondents

#### **INDEX**

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

Oistrict Police Officer, Swat

#### 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.

#### **GROUNDS:**

- 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/Palice Officer, Malakand Region Regional 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

#### <u>AFFIDAVIT</u>

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 Pukhrunkhwa, Peshawar (Respondent No. 1)

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

> Regional/Police Officer, Malakand Region (Respondent No. 3) Regional Police Officer, Malakand Region, Saidu Sharit, Swat.

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

Incharge Career Planning Branch CPO Peshawar

(Resnandent 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

#### 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, Majakami Region-(Respondent No. 3) egional 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)

Amer (A)

SEMIORITY LIST OF SENIOR CLERKS AS IT STOOD ON 31.12.2013

" | \_\_\_\_/E-V, The seniority list of Senior Clerks: - The seniority list of Senior Clerks is published for information of all conserned."

NO	263 /E-V, T	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	PROMOTION AS	REMARKS
0	Name				05.02.76	S. Clerk 04.12.86	Promotion forgone for ever vide DIG/Bannu letter No. 2643/ES
4	Khair Muhammad	Bannu	10 <sup>th</sup>	09.11.54			dated 28.09.98
`				05.02.56	30.9.80	27.3.90	
2.	Qamar Zaman	Bannu	BA	9.2.63	17.1.82	17.7.90	
	Akbar Ali	Swat	10 <sup>th</sup>	1.2.58	20.4.81	16.2.91	
4.	Bakhat Afsar	Swat	10 <sup>th</sup>	4:10.54	7.4.76	11,7.91	21.42.200
5	Gul Faraz	Mardan	10 <sup>th</sup> .	16.02.60	01.08.74 FC	15.10.91	Re-instate in service 31.12.200
	Muzafar Iqual	Peshawar	10 <sup>th</sup>	10.02.00	01.05.79 JC		
6.	7710		BA	2.2.56	1.6.80	01.3.92	
7.	Alam Khan	Swat		30.09.63	19.8.82	16.8.92	
- <u></u> -	Haibat Khan	- Bannu	10 <sup>th</sup>	25.12.62	28.11.83	22.8.93	Assigned revised seniority vic
9.	Muhammad Yousaf	A. Abad	10 <sup>th</sup>	10.09.64	08.11.82	11.12.2012	Order No. 19192-93/E-III date 06.08.2013
10.	Muhammad Saleem	Peshawar			1/2	22.8.93	00.00.20.2
		Mansehra	10 <sup>th</sup>	25.5.55	24.4.77 NO 14.12.83 JC		
11.	Muhammad Sultan		BA	11.3.63	18:4.86	25.4.94	
12.	Sana Ullah	Charsadda	F.A	21.10.66	11.01.87	03.01.96	hart.

80 1080		1	٠.		•		
		w	•				• • • • • • • • • • • • • • • • • • •
	Warne A. Son A. S.	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
		Abbottabad	BA	14.04.63	28.09.89	16.01.2008	
7 (1)	Riaz Muhammad	Mardan	· 10th	10.02.70	01.06.89	16.01.2008	
	Abdul Aziz - II Khurshid Ahmad	Swat	FA	14.05.56	21.12.80 Class IV. 17.10.89 JC	16.01.2008	•
		Abbottabad	D.Com	25.12.68	22.10.89	16.01.2008	
100,-11	Waheed ur Rehman	Haripur	10th	20.04.69	16.10.89	16.01.2008	
	Nizakat Khan Hussain Ali	Swat	FA	08:06.68	05.06.86 Class-IV	16.01.2008	
	Naseer Ahmad	Peshawar	FA	04.10.65	07.01.90	16.01.2008	
58.		Charsadda	10th	20.08.71	10.01.90	16.01.2008	The second of th
59. 60.	Ishtiaq Hussain	' Charsadda	10th	04.04.65	01.09.89 FC 29.03.90 JC	16.01.2008	
	. A Danger	DIKhan	10th	15.03.69	01.07.90	16.01.2008	•
61.	Muhammad Rainzan	Kohat	10th	29.12.69	09.07.90	16.01.2008	
62.	Shafaqat Hayat	Mansehra	, 10th	06.01.59	01.12.81	08.08.2009	•
63.	Haq Nawaz	Bannu	10th	18.05.65	06.10.85	02.12.2009	
64.	Muhammad Aslam	Kohat	10th	20.06.62	10.12.87	05.06.2009	, )
65.	Dildar Hyssain	Mansehra	10th	20.03.63	18.02.88	05.06.2009	fred
66.	Muhammad Jamshid	Mardan	10th	10.03.66	02.03.88	05.06.2009	EV3-14
67.	Muhammad Fahim	Mansehra	FA ·	21.04.65	10.03.88	05.06.2009	

		300	•			DATE OF	REMARKS
	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	PROMOTION AS S. Clerk	· ·
A SINO				10.08.1984	12.06.2009	22.07.2013	
No.	Saif ud Din	Kohat	F.Sc <sub>,</sub>	11.03.1987	12.06.2009	22.07.2013	
352.	Farman Ali	Shangla	BA	08.03.1971	12.06.2009	22.07.2013	
352. 353.	Muhammad Nawaz	Dir Upper	10 <sup>th</sup>	27.07.1990	12.06.2009	22.07.2013	
354.	Muhammad Haroon	DiKhan ·	FA	14.03.1988	12.06.2009	22.07.2013	
- 355.	Kifayat Ullah	. Bannu	B.Sc (Hounrs)	05.04.1988	12.06.2009	22.07.2013	<u> </u>
356.	Muhammad Shoaib	Lakki Lakki	FA FA	22,02.1984	12.06.2009	`l	
357.	Jalal ud Din	Lakki	F.Sc	08.04.1989	12.06.2009	22.07.2013	<u></u>
358.	Irfanullah	Charsadda	MA	07.04.1985	12.06.7009	22.07.2013	
359.	Farooq Shah	Charsada		<u> </u>	2 78 78	<del></del> }	$\alpha$ .

(MIAN MUHAMMAD ASTF) Addl: IGP/Headquarters

For Provincial Police Officer,

Khyber Pakhtunkhwa

**Peshawar** 

E/V, dated Peshawar, the Malakand, at Saidu Sharil Swall police Officer, police Officer, at Saidu Sharil Swall police Officer, at Saidu Sharil Swa

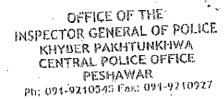
Copy of above is forwarded for information and necessary action to the

- 1. All Addl: IsGP in Knyber Pakhtunkhwa
  - Capital City Police Officer Peshawar
- E Commandants PTC Hangu,

All Regions Disc le Knyber Pakhtunkhwa

DISG CTD, Traffic & Telecommunication, Khyber Pakhtunkhwa Peshawar

Registrar CPO



while Ma /E-V.

Dated

Pashawar the 1/\_\_\_

2015

#### ORDER

This order will dispose of departmental enquiry against the following

officials: -

1. Mushtaq Ahmaa, Asstt: Grade Clerk D

DPO Swat.

2. Khurshid Ahamd, Senior Clerk

DPO Swat.

3. Hussain Ali, Senior Clerk

DPO Swat.

4. Muhammad Nawab, Senior Clerk

DPO Swat.

- The above accused officials were Charge Sheeted on account of the posting to Driving License Branch Swat for the period from 08.03.2016 29.08.2012 whereas they were held responsible for issuance of bogus driving ucenses under the fake signatures of Mr. Jehangir Khan, the then DSP, MLA Switch allegations were confirmed in the preliminary enquiry conducted by DSP/HC Swat. Hence they were proceeded under proper departmental proceedings and I 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 offic were held responsible for committing fraud and other irregularities in the lice branch.
  - 4. The accused officials were served with Final Show Causes. T submitted their replies accordingly. Finally they were summoned in the offic the undersigned and heard at length.
  - 5. The accused officials failed to rebut the charges nor could produ
  - depicts that besides departmental enquiry, the matter remained under end with DSP/HQrs: Swat who conducted enquiry u/s 157(1) Cr.P.C vide Daily I No.41 dated 24.09.2012. In the said enquiry, the Enquiry Officer establishanges through FSL and independent evidence u/s 157(1) Cr.PC. The charges is proved against the delinquent officials beyond any shadow of doubt. The accommitted gross misconduct in sheer violation of their officials and have earned bad name for the entire Police Department.

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
RHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR
PN: 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 Fules-1973 (Amended in 2011), hereby award them Major Punishment of compulsory retirement from Service with immediate.

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

No.2570-74/E-V dated Peshawar the, 21/4 /2015.

Copy of above is forwarded for information and necessary action to

the: -

1. Regional Police Officel, 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.

# BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL AT PESHAWAR

CM No of 2 In	022		
Service Appeal No. 2032	2 of 2020		
Hussain Ali		•••••	. Appellant
PPO etc	VERSUS		pondents

#### **INDEX**

C #		<del></del>		<u> </u>	
3.#	Description of Do	cuments		Annex:	D
1.	Application			THUICA.	Pages
2.	Affidavit	<del></del>	<u> </u>	<u> </u>	1-2
3	Copy of Additional Documents	<del></del> _			3
	20py of Maditional Documents	1		Α	4-20

Applicant / Appellant Through Counsel

> Muhammad Javaid Khan Advocate Supreme Court of Pakistan

## BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL AT PESHAWAR

CM No In	of 2022			
Service Appeal No.	2032 of 2020			
Hussain Ali			••••••	Appellant
•	VI	ERSUS		
PPO etc		•	Re	spondents

# 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

Kin shi

Through Counsel

Muhammad Javaid Khan Advocate Supreme Court of Pakistan

# BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL AT PESHAWAR

CM No o In	f 2022	
Service Appeal No. 20	032 of 2020	-
Hussain Ali	Appellan	t
	VERSUS	٠.
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

### FOR PUBLICATION IN THE KHYBE PAKHTUNKHWA POLICE GAZETTE PART-H, ORDERS BY THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA

PESHAWAR

Deshawar3//10/2017

### NOTHECATION.

te pun diddiese

S.No	NAME		
1)	Muhammad Yousuf of RPO/Abbottabad		
?)	Sana Ullah of Special Branch, KPK Peshawar		
3)	Zahir Ulluh of CCP office Peshawar Taj Muhammad of Inv: Wing Nowshehra	-	
5)	Muhammad Jamshed of DPO office Mansghra		
(6)	Ilham Ullah of DPO office Charsadda		
1 7) "	Sajind Hussain of CCP office Peshawar		
8)	Thsan Ullah of CPO, Peshawar		
9)	Javed Ali of DPO office Charsadda -		
10)	Inam Ullali of FRP/Hazara Range		
in	Sajud Anwar of DPO office Kohat	•	
12)	Muqarrab Alam Khan of RPO/Mardan		
13)	Abur Rauf of CCP office Peshawar		
14)	Tehseen Ullah of CPO, Peshawar.		
15)	Nadeem Ahmad of CPO, Peshawar.	-	
16)	Riaz Muhammad of FRP/Hazara Range		
17)	Nizakat Khan of RPO office Abbottabad.		
1 (8)	Nascer Ahmad of SSP/I milie office, Peshawar		
   19)	Ishtiaq Hussam of DPO office Charsadda 🥒	-	

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

1 Their promotion will be on probation for a period of one year and a single (character) needs one year in terms of Section-6 (02) of Khyber Pakhtunkhwa, Civil Second (61) of Kayber Pakhtunkhwa, Civil Servant (Appointment Rightstop, 164) for the first the first of

2 their promotion will take offect from the office at the first and the second of the

#### **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.<u>6561-90/E-V</u>, <u>PROMOTION</u>. 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



# 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 Office Government of Khyber Pakhtunkhwa at Central Police Office (CPO) Peshawar
  - 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



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").

- mentioned in the seniority list dated:

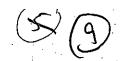
  31/12/2017 from serial No. 28 up to 358

  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.
  - 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:

      10/08/2017 to the respondent No.1 well within time i.e 15 days. (Copy of the



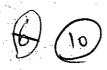
representation / application dated:

10/08/2017 along with covering letter of

DPO Dir Lower dated: 10/08/2017 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 "F").
- 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.



### GROUNDS:

i.

iii.

- 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.
- i. That the impugned order / seniority list

  dated 31/12/2016 has been passed in

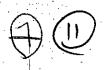
  violation of Section 8 of Khyber

  Pakhtunkhwa Civil Servant Act, 1973 and

  Rule 17 of Khyber Pakhtunkhwa Civil

  Servants (Appoint, Promotion and

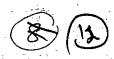
  Transfer) Rules, 1989.
  - That in the impugned seniority list, the reasons / remarks mentioned against the name of the appellant are incorrect, because the said denovo enquiry has been completed and the appellant was reinstated in service on 04/05/2017 by Regional Police Officer, Malakand at Saidu Sharif, Swat i.e Respondent No.3 (Copy of



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.
  - will be argued with the permission of this

    Hon'ble Court at the time of arguments.
- 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



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

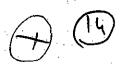
No. 792 CPB dated: 13/09/2017 for onward promotion as assistant grade clerks.

8) (I

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



## BEFORE THE SERVICE TRIBUNAL KHYBER

PAKHTUNKHWA, PESHAWAR

1067 12017 Service Appeal No. \_

Diary No. 1096

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

.....Appellant

## **VERSUS**

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

.....Respondents

06.10.2017

Appellant Poposited

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.

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. 29.01.2018

Appellant alongwith counsel present and Mr. Muhammad Valley 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.

ANNOUNCED 29.01.2018

Chairman Camp Court, Swat



### 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.

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.

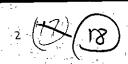
### **FACTS**

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

Kā vba salati

Poshbayer .



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

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.



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

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.

5.9.01.0.48

Francisco Self. Ning Muhimur Eling Mainf But With

All Gallet Hlong A Schuller

1600 14-2-18

بعد الت صبا - سروس مرسجورا جزير الموالية المساور الرائي الساور الرائي الموالية المو

# باعث تريآنك

مقد مہ مند رجہ عنوان بالا میں اپنے طرف ہے واسطے پیروی وجواب وہی وکل کاروائی معلام محدر رط کور مسلم است معلقہ آن مقام کیرے کور مسلم است معلقہ آن مقام کیرے کور مسلم است موسوف کومقد مہ کی کل کاروائی کا کائل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ وقتر راالت وفیملہ برحلف دینے جواب دہیا وراقبال دعوی اور درخواست ہرتم کی تقدیق زراوراس پرد تخط کرنے کا اختیار ہوگا۔ نیز بصور تعدم بیروی یا وُگری ایک طرف اپنل کی برامدگی اور منسوخ ندکور کے ممل یا ہزویکاروائی کے واسطے اور وکیل یا مختار قانونی کواپنی ہمراہ یا پنی بجائے تقر رکا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ فدکورہ بالا اختیارات حاصل ہوئے اور اسکا ساختہ برواختہ منظور وقبول ہوگا۔ اور دوران مقدمہ میں جو تم چہ وہر جاندالتو اے مقدمہ کے سب سے ہوگا اسک شخق وکیل صاحب ہوئے۔ نیز بقایا و تم چہ کی وصولی کرتے وقت کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہویا صدے باہر ہوتو وکیل صاحب بابند نہ ہوئی کی بیروی مقدمہ ندکور لہذاوکالت نامہ لکھ دیا کہ سند رہے وکیل صاحب بابند نہ ہوئی کی بیروی مقدمہ ندکورلہذاوکالت نامہ لکھ دیا کہ سند رہے الرقوم کے الرقوم کی الرقوم کی مقدمہ نے مورک کی مقدمہ نور کی کارور کی کارور کی کارور کی کارور کی کارور کی کارور کی کی کیروں کی مقدمہ نے کورلہذاوکالت نامہ کھ دیا کہ سند رہے الرقوم کی کیروں کی کارور کیا کیا کی کیروں کیل صاحب بابر ہوتو کی کیروں کی کیروں کی کیروں کی کیروں کی کیروں کیا گور کیا کاروں کیا گور کی کیروں کیروں کی کیروں کیروں کیا گور کیروں کی کیروں ک

Manda Mid Wife and a second selection of the control of the contro

may Just plan

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

* <b>†</b>	PESHAWA	.R.	
No.	•.	•	713
	203	of 20	20
· .			• .
/+u\$\$e	ans All	Appella	nt/Petitioner
PPO.	Versus 14 P10 k	De8h: Re	spondent
	,	ondent No3	
2 4 /	nesp	— — — — — — — — — — — — — — — — — — —	0 1 1 1:1
Notice to: _ Defonds /	nspech	E Genera	al of folial
(RPG) M	alakan	1 Region a	al of Palice/ Escat North-West Frontier
whereas an appeal/peu	ttion under the	broaksion or the	1401 ftt-14C30 T 10110101
Province Service Tribunal Act, 1 the above case by the petitioner i	n this Court and:	notice has been or	lered to issue. You are
hereby informed that the said a	appeal/petition is	s fixed for hearing	before the Tribunal
appellant/petitioner vou are at li	berty to do so on	the date fixed, or a	ny other day to which
the case may be postponed eith Advocate, duly supported by you	er in person or i	by authorised rep	resentative or by any
this Court at least seven days b	efore the date o	f hearing <u>4 copies</u>	of written statement
alongwith any other documents default of your appearance on	s upon which yo the date fixed a	ou rely. Please als nd in the manner	aforementioned, the
appeal/petition will be heard and	decided in your	absence.	•
Notice of any alteration is	n the date fixed f	or hearing of this a	ppeal/petition will be
given to you by registered post. address. If you fail to furnish suc	h address vour a	ddress contained 11	this notice which the
address given in the appeal/netit	ion will be deem	ed to be your correc	et address, and further
notice posted to this address by r this appeal/petition.	egistered post w		reme for the har hose or
Copy of appeal is attache	d. Copy of appea	l has already been	sent to you vide this
_		•	•
office Notice No			
Given under my hand and		Court, at Peshawa	ar this
Day of		20 20	Υ
at Camp Con	rt Su	at	al wall
		1100	istrar,
	. <b>K</b>	_	wa Service Tribunal, hawar.
Note: 1. The hours of attendance in the court	are the same that of the Hig	h Court except Sunday and Ga	zetted Holidays.

Always quote Case No. While making any correspondence.

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

NT-	*			_	112
No.	V 3.7	20	32	of 20 20	
			•	•	
•	Hussa	in Ni		.Appellant/Petitic	ner
	D Da	Versus	Do	1.	
•••				•	t
		·	spondent No		
Matina ta	Superin 12 Ple 1	tud	+ For	tilich.	must -V
Nonce to: —	enpecies	nercun.	C Za	BPL1811	recei
	12Ple (	POF	Vesho	nno	•
WHERE	AS an appeal/petice Tribunal Act, 1	ition under the	e provision	of the North-	west Frontier
the above case	by the petitioner i	n this Court and	l notice has b	een ordered to	issue. You are
*on	ned that the said a	at 8.00 <u>A.M.</u> Ii	f you wish to	o urge anythir	ig against the
appellant/peti	tioner you are at li	berty to do so or	n the date fix	ed, or any othe	r day to which
the case may Advocate duly	be postponed eith y supported by you	er in person or r power of Attor	ney. You are,	ea representa therefore, req	uired to file in
this Court at l	least seven days b	efore the date	of hearing <u>4</u>	copies of writ	ten statement
alongwith any	y other documents ur appearance on	s upon which y the date fixed	ou rely. Plea and in the n	ase also take nanner aforen	notice that in ientioned, the
appeal/petitio	on will be heard and	l decided in you	absence.		
Notice	of any alteration i	n the date fixed	for hearing	of this appeal/p	etition will be
given to you b	hy registered post.	. You should inf	orm the Reg	istrar of any c	change in your
addross given	u fail to furnish suc in the appeal/petit	ion will be deem	ied to be you	r correct addre	ss, and further
notice posted	to this address by r	egistered post v	vill be deeme	d sufficient for	the purpose of
this appeal/pe			•		· .
Copy of	f appeal is attache	d. Copy of appe	eal <del>has alrea</del>	dy been sent t	o you vide this
office Notice I	No	date	d,	****************	
•	under my hand and	•	s Court, at P	eshawar this	!1.1h
		Vou:			
Day of		Year	20 2	0	N
1 0		0 1	1		No see
at Ca	mp Cour	t Sind			
	The state of the s	•		Defeation	
	1	> 1	\ Khyber Pakl	Registrar, utunkhwa Sei	rvice Tribunal,
	S. A.	•		Peshawar.	* 7
Note: 1. The ho	ours of attendance in the court	t are the same that of the H	ligh Court except Sur	nday and Gazetted Holid	ays.

Always quote Case No. While making any correspondence.

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

No.			
Appeal N	203	<b>)</b>	20 20
Appeat No	)	& Uj 2	
f. f.	tr. Sayan A	LAppel	lant/Petitioner
	Versus	1.	
	Versus De fl. fl.	West.	Desnandent
ffd	hayaran fi ta fita bakan		Xesponaem
	R	espondent No	
	. 1	•	
Notice to: - In-Co	rarge //	anonina !	3 rench (CPO)
<i>(</i> , 0			
12P	10 posse	semas	TY 15 TY 1 TY 1
WHEREAS an appe Province Service Tribunal	al/petition under the	ne provision of the	e North-West Frontier
the above case by the petiti	ioner in this Court a	nd notice has been o	rdered to issue. You are
hereby informed that the	said appeal/petition	ı is fixed for hearir	ng before the Tribunal
*onl/	at <u>8.00 A.M.</u>	If you wish to urge	anything against the
the case may be postpone	d either in person (	or by authorised re	presentative or by any
Advocate, duly supported	by your power of Atte	orney. You are, there	efore, required to file in
this Court at least seven	days before the date	of hearing <u>4 copic</u>	s of written statement
alongwith any other docu default of your appearan	iments upon which	you rely. Flease at I and in the manne	er aforementioned, the
appeal/petition will be hea	rd and decided in yo	ur absence.	
	• • • •		s appeal/petition will be
given to you by registered	l post. You should in	iform the Registrar	of any change in your
addross If you fail to furni	ish such address you	r address contained	in this notice which the
address given in the appea notice posted to this addre	l/netition will be dee	med to be your corr	ect address, and further
this appeal/petition.	saby registered post	will be deemed suit	lololition the purpose s-
Copy of appeal is a	ttached. Copy of app	real has already be	en sent to you vide this
office Notice No	dat	ed	•
Given under my ha	nd and the seal of tl	ıiş Court, at Peshav	var this
Day of	Meest	20 )2	
Day of the second		20	
	, ,	. 1	1
at camp	5 Project 2	enat	No 1
al camp	car		M.
	• • • • • • • • • • • • • • • • • • • •	W A/T-0	gistrar, hwa Service Tribunal,
		. *	shawar.
The house of attendence is	the court are the same that of the	•	
Note: 1. The hours of attendance in 2. Always quote Case No. W	hile making any correspondence.	<b>-</b>	

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

No.			703
	Appeal No	of 20	•
	203	4	20
•••••	Hussum Alversi	Appeuani	Petitioner
	F483am AVVersi		•
*****	· yyy.	Resp	oondent
	PPO, 12-Pl	C Post No.	•
		Kesponaem No	***************************************
Notice to:	'		
Notice to: —	Assistant Ins	bectus Gene	ral of falu
	,		AUUIA.
WHEREAS	Sa Copperatue Sitions water	the profession of the	hvind vest evoluter
Province Service	e Tribunal Act. 1974, has bee	n presented/registered f	or consideration, in
the above case by	y the petitioner in this Court d that the said appeal/petiti	and notice has been orde on is fixed for hearing l	before the Tribunal
*on	at 8.00 A.M	<u>I.</u> If you wish to urge a	nything against the
appellant/pet/tie	oner your are at liberty to do s	o on the date fixed, or an	y other day to which
the case may be	e postponed either in person upported by your power of A	or by authorised repre torney You are, therefol	e, required to file in
this Court at les	ast seven days before the da	te of hearing <u>4 copies</u> o	i written statement
alongwith any c	other documents upon whic	h you rely. Please also	take notice that in
default of your	appearance on the date fix will be heard and decided in y	ed and in the manner a our absence.	norementioned, the
•			****
Notice of	any alteration in the date fix	ced for hearing of this ap	peal/petition will be
address If you fo	registered post. You should ail to furnish such address yo	ur address contained in 1	this notice which the
ni anasa missan in	the anneal/netition will be do	eemed to be vour correct	address, and further
notice posted to	this address by registered po	st will be deemed sufficie	ent for the purpose of
this appeal/petit		•	
Copy of a	ppeal is attached. Copy of a	ppeal has already been	sent to you vide this
i v	·	ated	••••
•			
Given un	der my hand and the seal of	this Court, at Peshawar	this
: Day of	***************************************	20 .	//.//(
Day Ul		•	•
•	Nov:	20	•
		L .	W
of com	A fut Smar	pl <sub>=i</sub>	Now Now You
We carry	Plourt Smar	Kegis Khyber Pakhtunkhy	a Service Tribunal,
	二十十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二	Resh:	
Note: 1. The hours	s of attendance in the court are the same that of	the High Court except Sunday and Gaze	tted Holidays.
· 2. Always q	uote Case No. While making any correspondent	ce.	. •

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

		PESHAW	AR.	TB
No.		203	<b>ว</b>	
	Appeal No	200	of	20 20
	Hussens	,	App	ellant/Petitioner
•	PPO	Versus 	lesh.	.Respondent
Notice to:	Is PO Ve	al foela Namo	spondent No	- Gunt of
Province S the above hereby in *on appellant the case r Advocate, this Cour alongwith default of appeal/pe	EREAS an appeal/peti- service Tribunal Act, 1 case by the petitioner is formed that the said a petitioner you are at li- nay be postponed eith duly supported by you t at least seven days be any other documents your appearance on tition will be heard and	ition under the 974, has been possible the seed of the	resented/register of notice has been is fixed for hear f you wish to ur n the date fixed, or by authorised refer you are, the of hearing 4 copyou rely. Please and in the many rabsence.	red for consideration, in ordered to issue. You are ing before the Tribunal ge anything against the or any other day to which epresentative or by any refore, required to file in ies of written statement also take notice that in ner aforementioned, the
given to y address. I address g notice pos this appe	ou by registered post.  f you fail to furnish suc iven in the appeal/petit sted to this address by r al/petition.	. You should inteh address your tion will be deer registered post v	form the Registrand address contained to be your conwill be deemed su	as appeal/petition will be ar of any change in your d in this notice which the rect address, and further fficient for the purpose o
••				een sent to you vide thi
	tice No			
Giv	ven under my hand an	<b>A</b>		awar this
<del>-</del>				10
wt	Camplow	rt Suid		Registrar,
		ii	Khyber Pakhtu	Khwa Service Tribuna Peshawar.

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.

Note:

### "A".

### KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

No.

	APPEAL No				
*	***************************************	1,0,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	***************************************	Apellant/Peti	tioner
			•		
		Versus	•	•	
	PPO	IR. GIE	fesh.		
			-	RESPONDE	ENT(S
			4,		
Notice to Appell	ant/Petitioner	Hussin	ph Se	en had Mon	Ali
	Min	oura Tel	sil Bac	to zai	***************************************
. «		Dis	#: Swa	it.	
Walta maki	ice that your a	nnoal has hoo	n fived for	Preliminary ho	earing
	d <b>a</b> vit/counter a <b>f</b>				
on	ugyit/counter ary	ida 2403 co 32 360	Sumono, or a		
			*		
,	!		•		
You may, t	herefore, appear sonally or throug	gh an advocate f	for presentat	aid date and at t ion of your case,	he said failin

Khyber Pakhtunkhwa Service Tribunal, Peshawar.

### "A"

### KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

	2032	2-0
***************************************		
•	Hussain 4h	Apellant/Petitione
<i>:</i>	•	•
•	Versus	
•	· versus	• .
	·	
		7
•	PPO, TAPE FO	RESPONDENT
•		
		•
tice to Appellant/	Petitioner	Javaid Char
	•	
*	of Pakietin at	Deen Cast
*		
•	of lakvetin at	Support
	3430	1607492
Take notice	that your appeal has been fix	•
	t/counter affidavit/record/argume	•
piicarion, airiaavi		-,-, -, -, -, -, -, -, -, -, -, -, -, -,
	4D************************************	
23/8/2021	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 Smat

No.

Khyber Pakhtunkhwa Service Tribunal,

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

	<u> </u>
No.	
Appeal No. 2032	مد of 20
Huss ain Ali	Appellant/Petitioner
Versus	0
PPO KPK	Nesh:
······································	
$\rho$	espondent NoL.
brownial Valice	office Gant: of 14 ple
Notice to: _ fraumain faction	Mars dans & white
1/08h	emar.
WHEREAS an appeal/petition under the	provision of the Khyber Pakhtunkhwa
Province Service Tribunal Act, 1974, has been petitioner in this Court and	d notice has been ordered to issue. You are
hereby informed that the said appeal/petition	is fixed for hearing before the Tribunal
*onat <u>8.00 A.M.</u> ]	If you wish to urge anything against the
appellant/petitioner you are at liberty to do so o the case may be postponed either in person or	n the date fixed, or any other day to which
Advocate, duly supported by your power of Atto	rney. 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 appeal/petition will be heard and decided in your	and in the manner aforementioned, the
Notice of any alteration in the date fixed	for hearing of this appeal/petition will be
given to you by registered post. You should inf address. If you fail to furnish such address your	orm the Registrar of any change in your
address given in the appeal/petition will be deen	ned to be your correct address, and further
notice posted to this address by registered post v	vill be deemed sufficient for the purpose of
this appeal/petition.	
Copy of appeal is attached. Copy of appe	al has already been sent to you vide this
office Notice Nodate	d
Given under my hand and the seal of thi	S Court, at Peshawar this 370
<b>n</b>	
Day of August	20 2. \$
L P AP + Swan	t all
at Comp Court Sunan	Mari
<b>,</b>	M Registrar,
- K	hyber Pakhtunkhwa Service Tribunal,
	D1

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.

### "P"

# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. 78

Mo				·	
No.		2032 Usan Au	•	2.5	
	Appeal No.	*, **	***************************************	of 20	
	Ho	ussam Au		· · · · · · · · · · · · · · · · · · ·	
	************	•••••	*********	Appellant/Petitio	ner
	ρ	10, 12 VOS	us Det.	• •	
. *		10 18 D)	E 1071	· · · · · · · · · · · · · · · · · · ·	-
•		••••••	· · · · · · · · · · · · · · · · · · ·	Respondent	<u>,</u>
					0
	sunta	- Hon	Respondent No		f.f
	provisia	nir mspec	for Jen	ral of	ie inc
Notice to:	Assista (Establis	/ / 1	, , 1	4 7	
,	1 Estable 8	mment )	Refle Degi	leasure.	
				,	٠.
WH	EREAS an appeal	petition under	the provision o	f the Khyber I	Pakhtunkhwa
	Service Tribunal A				
	case by the petition				
hereby in	formed that the sa	aid appeal/petiti	on is fixed for l	hearing before	the Tribunal
*on	8/222	at <u>8.00 A.M</u>	<u>I.</u> If you wish to	o urge anythin	g against the
appellant	t/petitioner you are	at liberty to do s	o on the date fix	ed, or any other	day to which
	may be postponed				
	, duly supported by				
	t at least seven da				
	h any other docum				
	f your appearance			nanner aforem	entioned, the
appeai/pe	etition will be heard	and decided in y	our absence.	•	
Not	tice of any alteration	nn in the date fiv	ad for hearing e	of this annual/ne	atition will be
	you by registered p				
	lf you fail to furnish				
	iven in the appeal/p				
	sted to this address				
	al/petition.				<b>F F</b>
-					
Cop	py of appeal is atta	ched. Copy of a	peal has alread	ly been sent to	you vide this
001 37			_		
office Not	tice No	da	ited		
Giv	en under my hand	and the seel of	this Count of D	aaharray thia	Bred
				esnawar this	
Day of	•	Augus!	2 <b>} 1</b>		
	*	- 0			
		4 113			
•	at lample	· . f &	a t		<u>.</u>
	at comple	eurs sun		J. J. J. J.	
			<b>\</b> \\-	$\mathcal{N}'$	•
• •	· ·			Régistrar,	
			Khyber Pakk	Thihwa Serv	ice Tribunal,

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.

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

App	eal No		of 20	•
			20	
HUSK	am pu	**********	Appellant/Petitioner	٠.
	Ver	sus		
The	Ver		Respondent	
		Respondent No.		
			7	**********
Notice to: De puis WHEREAS an a	y Inspector	General	of Papie	RPO
A	alakand V	11 of	Sugt !	
WHEREAS an a	ppeal/petition under	The provision of	f the Khyber Pakh	tunkhwa
T TOVINCE DELVICE 1110	unai Act, 1914, nas pe	en bresententeR	istered for consider	anon, m
the above case by the p				
hereby informed that	at Q 00 A 3	M If you wish to	a unga aprething ag	aimat tha
appellant/petitionery	ou are at liberty to do s	so on the date fixe	ed, or any other day	to which
the case may be post;	ooned either in perso	n or by authoris	ed representative o	or by any
Advocate, duly suppor this Court at least sev				
alongwith any other				
default of your appea	rance on the date fix	ked and in the m		
appeal/petition will be	heard and decided in	your absence.		
Notice of any algiven to you by regist address. If you fail to faddress given in the apnotice posted to this acthis appeal/petition.	urnish such address yo peal/petition will be d	inform the Regi our address conta eemed to be your	istrar of any change ained in this notice w correct address, and	e in your vhich the d further
Conv. of annual	ia attachad Cana af a		I 1	
Copy of appear	is attached. Copy of a	ppear has airead	ly been sent to you	vide this
office Notice No	d	ated	***********	•
Givon under my	thand and the seel of	this Count of De	ash arrow Alais	
· ·	hand and the seal of	_	esnawar this3 <i>yO</i> 1	
Day of		20	. <i>&gt; YO</i> 1	
•	ragust	. 21		
	sagust Court Smar		N N	
at Camp	Court Smal	•	الرحالي ١	
			Registrar,	
		Khyber Pakh	ninkhwa Service T	ribunal,
	· · · · · · · · · · · · · · · · · · ·	* * V	Peshawar.	
Note: 1. The hours of attenda	nce in the court are the same that of	the High Court except Sund	ay and Gazetted Holidays.	

Always quote Case No. While making any correspondence.

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

	•		·						16	
		Ap	peal No	20	D		of 2	20 .		
			- 	40	52	y		20		•
	•		Hussa	ويورون	********	* * * * * * * * * * * * * * * * * *	Appel	lant/Petiti	oner	
		•	CERSON	m ppu	Varores			,		٠.
		2			versus.			:	-	
	· .	f	D.P.G.,	/4)	ir	fish.	1	Responden	t	
			· · ·	•	Ros	pondent No				•
		1	,	, .	, Itos	· hounciët 140	**********	9	• • • • • • • • • • • • • • • • • • • •	•••••
Notic	e to:	S	u Dezi	entera	1 1	F . '4			1 11	~ 0
		-	P	k in	any	Esta	rbles	paner	x - V (	110
			Jour	1: 12	PIC	fle M	interve	£.,		
D	WHER		-PP	JULUIUII ULII	CCI VIIC	DI O 1 121011	Or DITC .	ixiywci .	r awiinaiir	ZII W CI
Prov	ince Ser	vice Tri	bunal Act	, 1974, has	been pr	esented/re	egistere	d for cor	sideratio	n, in
borol	by infan	e by the	pentione	r in this Co	ourt and	notice has	s been or	dered to	issue. You	a are
*on	oy miori	meu ina + /	it the said	l appeal/pe at <u>8.00</u>	A M TE	s iixea 101 von wich	r nearin	g before	tne Trib	unal
appe	Tany net	tioner	voji are at	liberty to	do so on	you wisii the date fi	urge on bosi	envotbo	ig againsi ndowtow	high
				ther in per						
Advo	cate, du	ly suppo	rted by yo	ur power	of Attorr	iev. You ar	e, there	fore, rea	uired to fi	ile in
				before the						
				nts upon v						
defa	ult of yo	ur appe	arance oi	n the date	fixed a	nd in the	manne	r aforem	entioned	, the
appe	al/petitic	on will b	e heard ar	nd decided	in your a	absence.		•		
addr addr notic	n to you ess. If yo ess given	by regis u fail to in the a to this a	stered pos furnish su ppeal/pet	in the dat t. You sho ich addres ition will b registered	uld info s your ac se deeme	rm the Re ldress con d to be you	egistrar tained i ur corre	of any c n this no ct addres	hange in tice whicl ss, and fur	your h the ther
	Copy of	f_appeal	is attach	ed. Copy o	of appea	l has alrea	ady bee	n sent to	you vide	this
offic	e Notice l	No	•	. · · .	3_4_4					•
OILIC	e Norice i	ΝΟ	*************	**************************************	dated.	**************	************	•••••		
				d the seal				ar this	7.1	
Day	of	•			· •	90			Jul	•
Day	J2	•••••	*************	1722	znst.	ـ 20 ـ	21			
				į.	/	•				
	£	٠ - ور	40	حکور او	F			<b>*</b>		٠.
	at	Cirn	up Lac	esz S	war	_				
	· · ·			at S		1		# F		
•						: 1	Reg	istrar,		
					Kh	yber P <b>a</b> k	htunizh	wa Serv	rice Tribu	ınal,
			<u> </u>				Pesl	awar.		•
Note:	1. The ho	ours of attend s quote Case	lance in the cour No. While makir	t are the same th ig any correspon	at of the High dence.	Court except Su	nday and Ga	etted Holiday	s. · · ·	<del></del>

### "R"

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

No.				13
Appeal N	Vo	<b>)</b>	. of 20 2 to	
······	Lussam, a		Appellant/Petition	·
	The state of the s		sppenant/Fethiol	ner
	Ver 20, 15, 12, 1	fish	Respondent	•
		Respondent No	•	
Notice to: _ In-co	rarge Can	eer Plann	ing Brian	uh
WHEREAS an appearance Service Tribural	Carlo f	le strumment		
the above case by the petiti hereby informed that the	Act, 1974, has been oner in this Court said appeal/petiticum	and notice has been and notice has been on is fixed for head on the date fixed to on the date fixed at or by authorised at torney. You are, that of hearing 4 could have rely. Please and in the man our absence.  The deformation of the date of the	tered for considered to is aring before to in a sering before to the representative refore, requipies of writted also take not an aforemental pet ar of any character address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address and reset address are reset address and reset address and reset address are reset address and reset address are reset address are reset address and reset address are reset address and reset address are reset address are reset and reset address are reset and reset and reset and reset and reset and reset address are reset and reset an	ideration, in ssue. You are he Tribunal against the lay to which we or by any red to file in a statement tice that in ationed, the ition will be age in your se which the
this appeal/petition.	o by registered pos	st wiii de deemed su	illicient for the	e purpose of
Copy of appeal is att	ached. Copy of ar	peal has already b	peen sent to y	ou vide this
office Notice No	da	.ted	*********	
Given under my hand	l and the seal of t	his Court, at Pesh	awar this	
Day of		، چ 20	3	rd
•	progrest.	21		
at Carriplan	A Smat	<b>A</b>		
		Khyber Pakhtun R	eshawar.	e Tribunal,
Note: 1. The hours of attendance in the 2. Always quote Case No. While r	court are the same that of the naking any correspondence.	e High Court except Sunday and		- - · · · · · · · · · · ·