

20th Sept 2022

Counsel for the appellant present. Mr. Kabiruallah
Khattak, Addl: AG present.

Written reply not submitted. Learned AAG assured
that the written reply will be submitted on the next
date. To come up for written reply on 15.11.2022
before S.B at camp court Abbottabad.





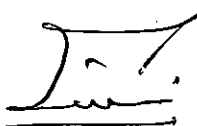
(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 944/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/06/2022	<p>The appeal of Mr. Muhammad Ajmal resubmitted today by Mr. Muhammad Aslam Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR,</p>
2-	14.7.22	<p>This case is entrusted to touring Single Bench at A.Abad for preliminary hearing to be put there on <u>19.7.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	19.07.2022	<p>Learned counsel for the appellant present. Preliminary arguments heard.</p> <p>Points raised need consideration, hence the appeal in hand is admitted to regular hearing subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 20.09.2022 before the S.B at Camp Court Abbottabad.</p> <p> (Salah-Ud-Din) Member (J) Camp Court Abbottabad</p>

Appellant Deposited
Security & Process Fee
26/7

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal No.....944/2022

Muhammad Ajmal Inspector No. 72/H Police Training Center,
Mansehra.

(Appellant)

VERSUS

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

(Respondents)

SERVICE APPEAL

INDEX

S/No	Description of Document	Ann- exure	Page No.
1.	Appeal.		01-08
2.	Orders dated 03-12-2013 & 26-12-2013	"A&B"	09-10
3.	Order dated 05-11-2014	"C"	11-13
4.	Relevant page of List "F" dated 30-06-2015	"D"	14-15
5.	Order dated 10-04-2016	"E"	16-17
6.	Revised List "F" dated 22-06-2018	"F"	18-19
7.	Order dated 18-02-2022	"G"	20
8.	Departmental representation dt.18-03-2022	"H"	21-23
9.	Order dated 27-04-2022	"I"	24
10.	Wakalatnama		

Appellant

Through

**(Mohammad Aslam Tanoli)
Advocate High Court
at Haripur**

Dated: 13-06-2022

①

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal No.....

Muhammad Ajmal Inspector No. 72/H Police Trainingg Center,
Mansehra.

(Appellant)

VERSUS

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

(Respondents)

**SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL
ACT 1974 AGAINST NOTIFICATION NO.CPO/ E-I/PROMOTION/
332 DATED 18-02-2022 OF THE PPO KPK PESHAWAR WHEREBY
APPELLANT'S JUNIOR HAS BEEN PROMOTED TO THE RANK OF
D.S.P (BPS-17) IGNORING THE PETITIONER WITHOUT ANY REASON
AND ORDER NO. CPO/CPB/196 DATD 27-04-2022 WHEREBY HIS
REPRESENTATION HAS BEEN REJECTED.**

**PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL BOTH
THE ORDERS DATED 18-02-2022 AND 27-04-2022 OF THE PPO KPK
PESHAWAR MAY GRACIOUSLY BE SET ASIDE/MODIFIED TO THE
EXTENT OF APPELL AND HE BE PROMOTED AS D.S.P (BPS-17)
WITH EFFECT FROM 18-02-2022 WHEN HIS JUNIOR WAS
PROMOTED ACCORDING TO SENIORITY WITH GRANT OF ALL
CONSEQUENTIAL SERVICE BACK BENEFITS.**

Respectfully Sheweth:-

1. That petitioner was enrolled in the Sind Police Force in the year 1987 and along-with his batch-mates/colleagues he was promoted and confirmed in the rank of Sub Inspector. Thereafter on his request the petitioner was transferred vide order dated 03-12-2013 from Sind Police to the Khyber Pakhtunkhwa police and posted in Hazard Region vide orders dated 26-12-2013

2

respectively. (Copies of both the orders dated 03-12-2013 and 26-12-2013 are attached as "A & B").

2. That vide KPK Provincial Police Officer Peshawar Notification dated 05-11-2014 the petitioner was ordered to be brought on promotion list "F" as recommended by the DPC meeting held on 16-10-2014. His name was placed at S/No.7 of the Notification and above the name of SI Azmat Ali No. K/200. (Copy of Notification dated 05-11-2014 is attached as "C").
3. That similarly the revised seniority list "F" of KPK Inspectors/Sub Inspectors as stood on 06-04-2015 prepared, issued and circulated on 30-06-2015 the name of petitioner is incorporated at Serial No. 333 of Page-11 of the list above the name of Offg Inspector Azmat Ali No. K/200. (Copy of relevant page No.11 of List "F" dated 30-06-2015 is as "D").
4. That subsequently the petitioner alongwith his batch-mates was confirmed as Inspector vide KPK PPO/IGP Peshawar Notification dated 10-04-2016 placing his name S/No.7 above the name of Inspector Azmat Ali No. K/200. (Copy of Notification dated 10-04-2016 is attached as "E").
5. That in the year 2018 another revised seniority list "F" of KPK Inspectors/Sub Inspectors as stood on 22-06-2018 was prepared, issued and circulated wherein the name of petitioner is also placed at S/No. 210 also above the name of said Inspector Azmat Ali No.K/200. (Copy of

revised seniority list "F" dated 22-06-2018 is attached as "F").

6. That despite the fact that according to Police Rules the petitioner fulfilled all the requirements for promotion but was not considered with his batch-mates/colleagues for promotion as DSP (BPS-17) by the competent authority while promoting his junior the said Inspector Azmat Ali No.K/200 as DSP (BPS-17) vide Notification No. CPO/E-I/Promotion/332 dated 18-02-2022. **(Copy of Notification dated 18-02-2022 is attached herewith as "G")**.
7. That appellant has rendered about 36 years service in the police department. He has always performed his assigned duties with devotion, dedication and honesty to the entire satisfaction of his superiors and never provided a chance of reprimand and has meritorious service record at his credit.
8. That appellant aggrieved of order dated 18-02-2022 preferred a departmental representation dated 18-03-2022 before the Provincial Police Officer KPK Peshawar which was filed vide order dated 27-04-2022 and copy endorsed on 09-05-2022 to Director PTC Mansehra which was delivered to appellant thereafter. **(Copies of representation dated 18-03-2022 and order dated 27-04-2022 are as Annexure "H & I")**.
9. That there was nothing adverse against the appellant to come as impediment in way of his consideration and promotion as D.S.P. (BPS-17) when his colleagues and

9

juniors were promoted vide order dated 18-02-2022 passed by the Provincial Police Officer KPK Peshawar. Appellant also has all the requisite qualifications required for promotion to the rank of DSP (BPS-17) on his side placed on service record.

10. Hence instant service appeal on the following grounds:-

GROUND:

- a) That both the impugned orders dated 18-02-2022 and 27-04-2022 of the Provincial Police Officer KPK Peshawar to the extent of appellant's rights of promotion are illegal, unlawful, void-an-initio, passed in slipshod, perfunctory and arbitrary in manner, against the law, rules & regulations, facts & circumstances of the matter, hence are liable to be set aside/modified to his extent by giving him promotion to the rank of DSP (BPS-17) alongwith his batch-mates/colleagues/juniors with effect from 18-02-2022.
- b) That the respondents have not treated appellant in accordance with law, departmental rules, regulations and policy on the subject and have acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 & unlawfully issued the impugned notifications, which are unjust, unfair hence, are liable to be set aside/modified to the extent appellant.
- c) That the appellate authority has also failed to abide by the law and even did not take into consideration the

5

grounds taken by appellant in his memo of appeal/representation for his promotion as DSP (BPS-17) alongwith his batch-mates/colleagues/ juniors on 18-02-2022. Thus the impugned notifications of respondents are contrary to the law as laid down in the KPK Police Rules 1934, other departmental rules regulations read with section 24-A of General Clause Act 1897 and Article 10-A of the Constitution of Islamic Republic of Pakistan 1973.

- d) That when on 15-02-2022 the meeting of promotion committee had been considering promotions of appellant's batch-mates/colleagues/juniors to the rank of DSPs(BPS-17) which notification was issued on 18-02-2022, the appellant already fulfilled all the conditions, requirements and qualifications for promotion to the post of DSP (BPS-17) but was not considered without any reason and contrary to the law and departmental rules and regulations and was deprived of his promotion on due date.
- e) That the appellant being qualified and fulfilling all requirements and conditions was eligible for promotion as DSP (BPS-17) on 18-02-2022 along with his batch-mates/colleagues/ juniors but was deliberately deprived of his legitimate promotion against the law, departmental rules and regulation. He deserves to be promoted as DSP (BPS-17) with effect 1802-2022 at right place in his seniority with his colleagues/juniors DSPs.

6


- f) That instant appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain and adjudication upon the same.

PRAYER:

It is, therefore, humbly prayed that on acceptance of instant Service Appeal both the orders dated 18-02-2022 and 27-04-2022 of respondents/PPO KPK Peshawar may graciously be set aside/modified to the extent of appellant be promoted as DSP (BPS-17) alongwith his batch-mates/colleagues/juniors with grant of all consequential service back benefits.


Appellant

Through:


(Mohammad Aslam Tanoli)
Advocate High Court
At Haripur

Dated 13-06-2022

VERIFICATION

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

Dated 13-06-2022


Appellant

7

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Muhammad Ajmal Inspector No.H/72 presently posted at
Police Traing School, Mansehra.(Appellant)

VERSUS

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Mansehra. **(Respondents)**


SERVICE APPEAL

AFFIDAVIT:

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


Deponent/Appellant

Dated: 13-06-2022

Identified By: 
Mohammad Aslam Tanoli
Advocate High Court
At Haripur


Appellant

8

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Muhammad Ajmal Inspector No.H/72 presently posted at
Police Traing School, Mansehra.(Appellant)

VERSUS

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Mansehra. **(Respondents)**

SERVICE APPEAL

CERTIFICATE

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


APPELLANT

Dated: 17-06-2022



9

Ames - 'A'

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
SINDH, KARACHI

No. 9792-96 IF-1013/12/E-II/5.1.
Karachi, dated 3-09-2013.

ORDER

With the approval of IGP / Khyber Pakhtunkhwa vide letter No: 14148/E-II, dated 18.06.2013, Sub-Inspector Muhammad Ajmal s/o Muhammad Irfan of Sindh Police (Special Branch) is hereby transferred and posted to Khyber Pakhtunkhwa Police (District Abbotabad), on the following terms and conditions which have already been accepted by him:-

- i. That the appointment will be treated as fresh appointment for the purpose of seniority and accordingly he will get seniority from the date of joining the Khyber Pakhtunkhwa Police and will be placed at the bottom of the officials of his rank.
- ii. That only pay of the official will be protected.
- iii. That the official will not be entitled to any transfer TA / DA and transfer grant.
- iv. That the pensionary liability will be shared between Government of Sindh and Khyber Pakhtunkhwa Government in accordance with the standing agreement as contained in appendix 4 of the Punjab Finance Rule Volume II.
- v. That the official will be liable to be transferred anywhere in the Khyber Pakhtunkhwa and as such he would not insist for posting of his own choice.

Sd/-
(SHAHID NADEEM BALOCH) PSP
INSPECTOR GENERAL OF POLICE,
SINDH, KARACHI.

Copy forwarded to the following for information & necessary action:-

- 1. The Accountant General of Sindh, Karachi.
- 2. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar w/r to his letter No: quoted above.
- 3. The Addl: Inspector General of Police, Special Branch, Sindh, Karachi.
- 4. Order file.

(AHMED YAR CHOHAN) PSP
AICP / ESTABLISHMENT,
FOR INSPECTOR GENERAL OF POLICE,
SINDH, KARACHI.

Ahmed
Chohan


(10)

Annex - 'B'

ORDER

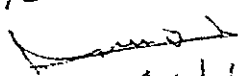
Consequent upon on transfer from Sindh Police to Khyber Pakhtunkhwa Police SI Muhammad Ajmal is hereby transferred and posted to Hazara Region on the following terms and conditions which have already been accepted by him:-

- i. That the appointment will be treated as fresh appointment for the purpose of seniority and accordingly he will get seniority from the date of joining the Khyber Pakhtunkhwa Police and will be placed at the bottom of the officials of his rank.
- ii. That only pay of the official will be protected.
- iii. That the official will not be entitled to any transfer TA/DA and transfer grant.
- iv. That the pensionary liability will be shared between Govt. of Sindh and Khyber Pakhtunkhwa Govt. in accordance with the standing agreement as contained in appendix-4 of the Punjab Finance Rule, Volume-II.
- v. That the officials will liable to be transferred anywhere in the Khyber Pakhtunkhwa and as such he would not insist for posting of his own choice.

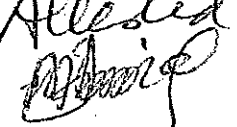

(SYED FIDA HASSAN SHAH)
AIG/Establishment
For Provincial Police Officer,
Khyber Pakhtunkhwa
Peshawar

No. 31516 /E-II dated Peshawar the 26/12/2013

Copy of above is forwarded for information and necessary action to the Deputy Inspector General of Police, Hazara Region, Abbottabad. His service book received from 'SSP/Political Special Branch Karachi vide his letter No. SB/P/Estt/5824, dated: 10.12.2013' is also sent herewith for record in your office.

Serika Kall Received

87/1/14
SRC

Encl. 5/BOOK

Accepted




14/44
10-11-2014

Annex - 'C'

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

NOTIFICATION

No. 2283 - E-II, PROMOTION TO LIST "F" Dated: 5/11/2014

The names of the following, confirmed Sub-Inspectors of Khyber Pakhtunkhwa Police are hereby brought on promotion list "F" and for Promotion Offg. Inspectors with immediate effect as per recommendation of DPC meeting held on 16.10.2014.

S#	NAME & RANK	REGION/UNIT
1	SI Gharib Nawaz No. K/15	Kohat Region
2	SI Nabi Shah B/37	Bannu Region
3	SI Muhammad Jalil No. B/44	-do-
4	SI Gul Rauf No. B/90	-do-
5	SI Waqar Ahmad B/64	-do-
6	SI Gul Sher Khan MR/59	Mardan Region
7	SI Muhammad Ajmal H/72	Hazara Region
8	SI Azmat Ali No. K/200	Kohat Region
9	SI Umar Gul No. MR/59	Malakand Region
10	SI Imran Farooq No. MR.62	Mardan Region
11	SI Farooq Zaman No. MR/02	-do-
12	SI Fazli Subhan No. MR/15	-do-
13	SI Muhammad Saeed No. MR/27	-do-
14	SI Kausar Khan No. MR	-do-
15	SI Fahim Bacha No. MR/44	-do-
16	SI Fazal Sher No. MR/07	-do-
17	SI Jehangir Khan No. H/11	Hazara Region
18	SI Muhammad Arshad No. H/41	-do-
19	SI Muhammad Tahir No. H/56	-do-
20	SI Muhammad Safat No. H/57	-do-
21	Sajjad Muhammad H/73	-do-
22	SI Muhammad Javed No. H/58	-do-

Attested

12

23	SI Raja Khan No.H/60	Hazara Region
24	SI Masood Khan No.H/61	-do-
25	SI Sheraiz Ahmad No. H/62	-do-
26	SI Muhammad Gul Zar No. H/63	-do-
27	SI Faisal No.H/64	-do-
28	SI Muhammad Shabeen No.H/66	-do-
29	SI Abdul Hafiz No.H/67	-do-
30	SI Muhammad Tanveer No.H/68	-do-
31	SI Muhammad Sabir No.H/70	-do-
32	SI Jawad Khan No. MR/14	Mardan Region
33	SI Muslim Shah No.MR/29	-do-
34	SI Muhammad Bashir No. MR/31	-do-
35	SI Muhammad Iqbal No. MR/40	-do-
36	SI Niaz Hussain No. MR/45	-do-
37	SI Hassan Ullah No.121/M	Malakand Region
38	SI Abdul Ghaflar No. MR/54	Mardan Region
39	SI Rosh-ul-Amin No.MR/10	-do-
40	SI Insan Ullah Khan No.M/256	Malakand Region
41	SI Amir Shah No. M/134	-do-
42	SI Nazeem Khan No. M/347	-do-
43	SI Muhammad Shefi No. M/454	-do-
44	SI Bahadar Khan No. M/457	-do-
45	SI Haji Akbar No. M/463	-do-
46	SI Ghani-ur-Rehman No. M/470	Mardan Region
47	SI Tamiz Ud Din No. M/471	Malakand Region
48	SI Aqsool Shah M/114	-do-
49	SI Abdul Hamain No. P/252	CCE/Peshawar
50	SI Habib Khan No. P/253	-do-
51	SI Iqbal ur Rehman No. P/254	-do-
52	SI Muhammad Riaz No. P/255	-do-
53	SI Nasser-ud-Din No. P/256	-do-
54	SI Muhammad Nasseem No. P/257	-do-

Attest
[Signature]

13

		CCP/Peshawar
55	SI Amir Hussain No. P/258	
56	SI Dad Muhammad No. P/259	-do-
57	SI Imtiaz Alam No. P/260	-do-
58	SI Saif-ur-Rehman No. P/261	-do-
59	SI Farhad Ali No. P/262	-do-
60	SI Inad Ullah No. P/263	-do-
61	SI Muhammad Arif No. P/264	-do-
62	SI Muhammad Nazeem No. P/265	-do-
63	SI Masad Khan No. P/266	-do-
64	SI Muhammad Fazil No. P/267	-do-
65	SI Khayal Nawaz No. P/268	-do-
66	SI Mushtaq No. P/269	-do-
67	SI Anwar Khan No. P/270	-do-
68	SI Muhammad Qayyum No. P/271	-do-
69	SI Hazrat Ali No. P/295	-do-
70	SI Sardar Hussain No. P/272	-do-
71	SI Kiramat Shah No. P/273	-do-
72	SI Qaiser Khan No. P/274	-do-
73	SI Bakht Munir No. P/275	-do-
74	SI Akhtar Gul No. P/276	-do-
75	SI Fozli Karim No. P/277	-do-
76	SI Dost Muhammad No. P/278	-do-
77	SI Mian Niaz Muhammad No. P/279	-do-
78	SI Sikandar Shah No. P/280	-do-
79	SI Jan Muhammad No. P/281	-do-
80	SI Abdur-Rauf No. P/282	-do-
81	SI Khurshid Khan No. P/283	-do-
82	SI Riaz Ahmad No. P/284	-do-
83	SI Zahoor ur Rehman No. P/285	-do-
84	SI Sardar Hussain No. P/286	-do-
85	SI Shafi Ullah No. 287/P	-do-
86	SI Muhammad Shaban Shah No. 288/P	-do-
87	SI Noor Ullah Jan No. P/289	-do-
88	SI Muhammad Tahir No. P/290	-do-

Attested
[Signature]

15

25 Aug. 2015 2:30PM F1

PRC NO. : 9212602

FROM : COMPTROLLER

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S.N	NAME AND NO.	HOME DISTRICT	EDU.	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF. AS SI	D.O ADMIN. TO LIST	D.O PROMOTION AS OFFG. INSPECTOR	D.OF CONF. AS INSP.	REMARKS
329.	Muhammad Ajmal H/72	Manshra	BA	01.01.1967	07.06.1997	25.07.2009	05.11.2014	05.11.2014		
334.	Ammat Ali No. K/200	Kohat	FA	01.04.1978	25.02.1998	10.01.2014	05.11.2014	05.11.2014		
335.	Umar Gul No. MR/59	MKD Agency	10th	14.02.1970	03.04.1991	28.01.2014	05.11.2014	05.11.2014		
336.	Lamia Farooq No. MR.62	Mardan	BA	11.10.1967	01.12.1991	28.01.2014	05.11.2014	05.11.2014		
337.	Farooq Zameer No. MR/02	Swabi	MA	01.04.1979	27.03.2003	11.03.2014	05.11.2014	05.11.2014		
338.	Faiz Subhan No. MR/15	Charsadda	10th	15.12.1968	20.09.1988	11.03.2014	05.11.2014	05.11.2014		
339.	Muhammad Saeed No. MR/27	Swabi	FA	20.10.1966	01.01.1987	11.03.2014	05.11.2014	05.11.2014		
340.	Kauar Khan No. MR	Charsadda	FA	03.04.1968	15.08.1988	11.03.2014	05.11.2014	05.11.2014		
341.	Fahim Bacha No. MR/44	Mardan	FA	02.01.1985	28.02.2006	11.03.2014	05.11.2014	05.11.2014		
342.	Faiz Sher No. MR/07	Swabi	10th	18.01.1970	25.09.1988	11.03.2014	05.11.2014	05.11.2014		
343.	Jehangir Khan No. H/11	Abbottabad	B.Sc	20.04.1960	15.10.2006	31.03.2014	05.11.2014	05.11.2014		
344.	Muhammad Anhad No. H/11	Manshra	MA	15.03.1974	01.09.1992	31.03.2014	05.11.2014	05.11.2014		
345.	Muhammad Tabb No. H/56	Haripur	BA	19.10.1965	05.09.1991	31.03.2014	05.11.2014	05.11.2014		
346.	Muhammad Bisat No. H/57	Haripur	MA	02.02.1980	24.01.2001	31.03.2014	05.11.2014	05.11.2014		
347.	Sajjad Muhammad H/73	Abbottabad	MA/BA	09.04.1978	10.12.1996	31.03.2014	05.11.2014	05.11.2014		
348.	Muhammad Javed No. H/51	Abbottabad	MA	20.11.1972	27.06.1996	31.03.2014	05.11.2014	05.11.2014		
349.	Raja Khan No. H/60	Kohistan	BA	14.02.1977	23.07.1998	31.03.2014	05.11.2014	05.11.2014		
350.	Masood Khan No. H/61	Haripur	MA	07.01.1979	13.03.2003	31.03.2014	05.11.2014	05.11.2014		
351.	Sheeraz Ahmad No. H/61	Manshra	BA	01.01.1978	28.01.2002	31.03.2014	05.11.2014	05.11.2014		
352.	Muhammad Gul Zar No. H/63	Abbottabad	BA/LLB	12.01.1974	20.10.1999	31.03.2014	05.11.2014	05.11.2014		
353.	Faizal No. H/64	Haripur	FA	18.02.1983	06.03.2006	31.03.2014	05.11.2014	05.11.2014		
354.	Muhammad Shabeer No. H/66	Abbottabad	BA	01.03.1969	26.09.1988	31.03.2014	05.11.2014	05.11.2014		
355.	Abdul Hafeez No. H/67	Abbottabad	FA	24.01.1968	11.12.1998	31.03.2014	05.11.2014	05.11.2014		
356.	Muhammad Tanveer No. H/68	Abbottabad	FA	12.03.1968	24.09.1987	31.03.2014	05.11.2014	05.11.2014		
357.	Muhammad Sabir No. H/70	Manshra	10th	03.03.1971	31.03.1991	31.03.2014	05.11.2014	05.11.2014		
358.	Jawad Khan No. MR/14	Swabi	BA	11.04.1979	26.01.2007	31.03.2014	05.11.2014	05.11.2014		
359.	Muslim Shab No. MR/29	Mardan	FA	09.03.1970	29.09.1990	01.07.2014	05.11.2014	05.11.2014		
360.	Muhammad Bahir No. MR/31	Mardan	10th	31.05.1964	10.05.1984	01.07.2014	05.11.2014	05.11.2014		
361.	Muhammad Iqbal No. MR/40	Mardan	BA	20.04.1968	16.10.1991	10.07.2014	05.11.2014	05.11.2014		
362.	Niaz Hussain No. MR/45	Mardan	FA	16.12.1978	28.02.2006	25.07.2014	05.11.2014	05.11.2014		
363.	Hassan Ullah No. MR/54	Chitral	FA	07.12.1966	21.09.1986	11.01.2014	05.11.2014	05.11.2014		
364.	Abdul Ghaffar No. MR/54	Mardan	PA	20.05.1961	02.09.1980	01.09.2014	05.11.2014	05.11.2014		
365.	Reeb-ul-Amin No. MR/10	Swabi	FA	20.05.1961	28.03.2006	12.09.2014	05.11.2014	05.11.2014		

(14) Annex 'D'

REVISED SENIORITY LIST OF INSPECTORS & SUBINSPECTORS ON LIST "F" OF KYBER PAKHTUNKHWA POLICE AS IT STOOD ON 30.06.2013

No. 1514 /E-II, Seniority List:- The seniority list of Inspectors and Sub Inspectors on List "F" of Khyber Pakhtunkhwa Police as it stood on 06.04.2015 is hereby published for information to all concerned:-

S.#	NAME AND NO.	HOME DISTRICT	KDU:	D.O.BIRTH	D.O JOINING - SERVICE	D.O CONF: AS SI	D.O ADMIN: TO LIST "F"	D.O PROMOTION AS OFFG: INSPECTOR	D.O.F CONF: AS INSP:	REMARKS
1.	Muhammad Javed No.1041	Manshara	10 ^a	03.06.1963	01.07.1982	27.03.2008	05.04.2008	05.04.2008	31.10.2013	Reverted from the rank of DSP to Insp: vide IPO No. 2023/JSE-1 dt: 11.09.2014
2.	Takhar Shah No. MR/42	Mardan	MA	30.04.1966	27.04.91	25.02.2000	20.12.2006	15.07.2013		He was promoted as Offg: Inspector on 15.07.2013 after separation from Motorway Police
3.	Muhammad Sajjad No. K10	Karak	MA	12.08.1965	02.05.1991	16.03.2005	07.11.2007	11.01.2008	23.12.2011	Assigned to city vide No. 4526-70-E-II dt: 01.03.2008
4.	Abdul Salam Khalid No. P/15	Lahli	M.A	24.06.1976	01.07.1998	05.09.2007	07.11.2007	11.01.2008	31.12.2011	
5.	Zahid Ur Rehman No. 1076	Haripur	N.S:	25.03.1979	31.12.1994	06.04.2005	05.04.2008	05.04.2008	23.12.2011	
6.	SI Sanaullah No. 27/10	D.I. Khan	10 ^a	12.04.1959	17.06.1977	01.09.2007	05.04.2008	05.04.2008		Reverted to SI by R/O: Bannu vide No. 3067-59 EC dt: 16.11.2010
7.	Mohsin Shah No. C/03	D.I.C	FA	01.01.1960	29.03.1980	10.01.2003	05.04.2008	05.04.2008		Re-instated in service by Service Tribunal vide D/G: Khat Order No. 7089-91/E.C dt: 11.2014.
8.	SI Zahir Ur Rehman No. H.86	Shangla	10 ^a	10.01.1962	24.07.1985	27.03.2001	05.04.2008	05.04.2008		As reinstated by MO: JGP/SB vide his Memo No: 6813/EB, dt: 13.09.2013 he was united as SI by D/G: CTD dt: 06.09.2013
9.	S. Jamal Akbar Shah No. P/76	Peshawar	M. Sc	20.03.1975	25.06.1998	30.06.2009	05.04.2008	05.04.2008	31.10.2013	
10.	Muhammad Ilyas No. MR 61	Mardan	FA	25.12.1973	25.12.1993	13.07.2009	01.10.2009	01.10.2009	31.10.2013	
11.	Rakhan Zeb No. P/120	Swabi	FA	07.04.1965	17.09.1988	13.07.2009	30.07.2010	30.07.2010	29.8.2014	Confirmed vide Notif: No. 593/E-II, dt: 29.8.2014.
12.	Jehanuzda No. MR/65	Charsadda	MA	01.04.1963	07.03.1982	13.07.2009	01.10.2009	01.10.2009	31.10.2013	
13.	Naseer Ali No. P/01	Charsadda	BA	05.10.1975	26.12.2000	09.01.2009	28.01.2010	28.01.2010	31.10.2013	
14.	Muhammad Rauf No. MR/67	Mardan	10 ^a	04.04.1963	02.01.1982	20.05.2009	28.01.2010	28.01.2010	31.10.2013	Reinstated in service by Service Tribunal vide D/G: Mardan Order No. 3470-74/E.C dt:

25 Aug. 2015 2:30 PM

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FROM: COMDT/PAK

M. Usman



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE, PESHAWAR
Ph# 091 - 9210239/091 - 9210345

No. — /E-II, dt: 10/04/2016

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

NOTIFICATION

No. 924 /E-II, CONFIRMATION AS INSPECTOR:-As per recommendation of the DPC dated 30.03.2017 duly approved by the Worthy Inspector General of Police Khyber Pakhtunkhwa, the following Offg. Inspectors on list "F" are hereby confirmed as Inspector from the date as noted against each their names.

S.NO	NAME & NO.	REGION	D.O - CONFIRMATION
01.	Habib Ullah No.K/45	Kohat	19.10.2015
02.	Gul Arif No.P/205	CCP, Peshawar	31.10.2015
03.	Nabi Shah B/37	Bannu	05.11.2016
04.	Muhammad Jaill No. H/44	Bannu	05.11.2016
05.	Gul Rauf No. B/90	Bannu	05.11.2016
06.	Gul Sher Khan MR/99	Mardan	05.11.2016
07.	Muhammad Aimal H/72	Hazara	05.11.2016
08.	Azmat Ali No. K/200	Kohat	05.11.2016
09.	Umar Gul No. MR/59	Mardan	05.11.2016
10.	Imran Farooq No. MR/62	Mardan	05.11.2016
11.	Farooq Zaman No. MR/02	Mardan	05.11.2016
12.	Fazal Subhan No.MR/15	Mardan	05.11.2016
13.	Muhammad Sareer No.MR/27	Mardan	05.11.2016
14.	Kausar Khan No.MR/21	Mardan	05.11.2016
15.	Fahim Wahe No MR/44	Mardan	05.11.2016
16.	Fazal Shah No. MR/07	Mardan	05.11.2016
17.	Jehangir Khan No.H/11	Hazara	05.11.2016
18.	Muhammad Arshed No.H/41	Hazara	05.11.2016
19.	Muhammad Tahir No.H/55	Hazara	05.11.2016
20.	Muhammad Rintat No. H/52	Hazara	05.11.2016
21.	Sajjad Muhammad H/73	Hazara	05.11.2016
22.	Raja Khan No.H/60	Hazara	05.11.2016
23.	Masoud Khan No. H/61	Hazara	05.11.2016
24.	Faisal Ko.H/64	Hazara	05.11.2016
25.	Muhammad Shazeen No.H/66	Hazara	05.11.2016
26.	Abdul Hafeez No.H/67	Hazara	05.11.2016
27.	Muhammad Tanveer No.H/68	Hazara	05.11.2016
28.	Muhammad Sabir No.H/70	Hazara	05.11.2016
29.	Muhammad Shah No.MR/29	Mardan	05.11.2016
30.	Muhammad Bashir No. MR/31	Mardan	05.11.2016
31.	Muhammad Iqbal No. MR/40	Mardan	05.11.2016
32.	Hassan Ullah No.121/M	Muzakand	05.11.2016
33.	Rosh-ul-Amin No MR/10	Mardan	05.11.2016
34.	Muhammad Latif No. MR/12	Mardan	05.11.2016

Attested
[Signature]



17

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE, PESHAWAR
Ph# 091 - 9210239, 091 - 9210245

No. _____ /E-II, dt. 10/04/2016.

83.	Muhammad Iqbal No.D/20	DI Khan	05.11.2016
84.	Sasique Ullah Khan No.D/21	DI Khan	05.11.2016
85.	Sihal Jehan No. H, 71	Hazara	05.11.2016
FSL			
86.	Zameer Ahmad	FSL	23.01.2017
87.	Amyad Javed	FSL	19.08.2015
TELECOMMUNICATION			
88.	Mehi Wazir	Tele	23.01.2017

Their gazette notification according to Police rules may please be issued.

(MASOOD AHMAD KHALIL) PSp
A/C Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa Peshawar.

No. 925 - 45 /E-II.

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

1. All Additional Inspectors General of Police in Khyber Pakhtunkhwa.
2. All Deputy Inspectors General of Police in Khyber Pakhtunkhwa.
3. All Regional Police Officers, in Khyber Pakhtunkhwa.
4. Capital City Police Officer, Peshawar.
5. Commandants Elite Force, FRP and PTC Hangu.
6. PSO to Worthy Inspector General of Police Khyber Pakhtunkhwa.
7. PRO to Worthy Inspector General of Police Khyber Pakhtunkhwa.
8. Registrar CPO, Peshawar.
9. Office Supdt. Secret CPO.
10. Office Supdt. Career Planning Branch, CPO.
11. U.S.P file.

Attested
[Signature]

10/04/17
11-4-17

(18)

Annex 'F'

REVISED SENIORITY LIST OF INSPECTORS & SUB INSPECTORS ON LIST "F" OF KHYBER PAKHTUNKHWA POLICE AS IT STOOD ON 22.06.2018.

No. 617 /E-II, Seniority List- The seniority list of Inspectors and Sub Inspectors on List "F" of Khyber Pakhtunkhwa Police as it stood on 22.06.2018 is hereby published for information to all concerned:-

S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O. BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMN: TO LIST "F"	D.O PROMOTION AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	REMARKS
1.	Muhammad Sajjad No. K/30	Karak	MA	12.08.1965	02.05.1991	16.03.2005	07.11.2007	11.01.2008	23.12.2011	Assigned seniority vide No. 4526-10/E-II dated 04.03.2008
2.	SI Sanullah No. D/10	D.I.Khan	10 th	12.04.1959	17.06.1977	01.09.2007	05.04.2008	05.04.2008		Reverted as SI by R.O. Bannu vide No. 3067-69.EC dt: 16.11.2010
3.	Zahir ur Rehman No. H/86	Shangla	10 th	10.01.1962	24.07.1985	27.03.2008	05.04.2008	05.04.2008		Restored seniority vide order No. 578-85/E-2, dated 11.06.2018.
4.	Subir Khan No. P/69	Peshawar	BA	08.12.1958	21.12.1994	30.06.2008	05.04.2008	05.04.2008	31.10.2013	Restored Seniority vide order No. 553-57/E-II dated 11.06.2018
5.	S. Jamal Athar Shah No. P/76	Peshawar	M.Sc	20.03.1975	25.06.1998	30.06.2008	05.04.2008	05.04.2008		
6.	Sher Afzar No. MR/66	Swabi	10 th	09.02.1965	30.10.1984	13.07.2009	20.12.2011	25.05.2016		Assigned seniority with his colleagues officers vide order Endst: No.482-85/E-II, DT 16.02.2017.
7.	SI Mazhar Jehan No. K/19	Kohat	FA	12.12.1970	26.02.2000	30.06.2008	30.07.2010	30.07.2010		Reverted to the rank of SI vide DICI Kohat Region Order Endst: No. 2146-47/E.C. dt: 26.2.014
8.	Rehmat Ali No. P/130	Peshawar	10 th	01.03.1960	17.06.1979	04.11.2011	10.12.2011	10.11.2011	02.08.2012	
9.	Asad Zubeir No. K/20	Kohat	FSc	15.01.1980	24.02.2000	30.06.2008	20.12.2011	20.12.2011		Restored seniority order No. 368-72/E-II, dated 11.06.2018
10.	Muhammad Saleem Tariq No. D/03	D.I.Khan	FA	01.03.1969	03.01.1991	12.11.2010	20.12.2011	20.12.2011	29.08.2014	
11.	Farman Akhtar No. H/21	Haripur	7 th	01.01.1966	08.07.1984	19.07.2011	20.12.2011	20.12.2011	29.08.2014	
12.	Muhammad Javed No. H/26	Mansehra	10 th	03.02.1964	04.04.1983	19.07.2011	20.12.2011	22.01.2016		Restored seniority vide order No. 538-60/E-II, dated 11.06.2018.
13.	Muhammad Riaz No. K/107	Karak	10 th	13.03.1973	09.09.1991	02.12.2011	30.01.2013	30.01.2013	19.10.2015	

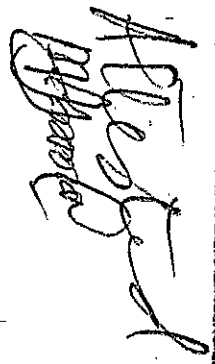
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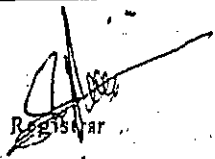
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OS/E-II

Assistant E-II

S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O. BIRTH	D.O. JOINING SERVICE	D.O. CONF: AS SI	D.O. ADMMN: TO LIST "F"	D.O. PROMOTION AS OFFG: INSPECTOR	D.O. CONF: AS INSP:	REMARKS
198.	Muhammad Tariq No. K/73	Kohat	FA	07.01.1966	23.06.1986	10.01.2014	11.02.2014	11.02.2014	11.02.2016	
199.	Shoukat Hayat No. K/13	Kohat	FA	20.12.1982	28.02.2006		11.02.2014	11.02.2014	11.02.2016	
200.	Latifullah No. K/34	Bannu	10th	10.02.1962	18.11.1981	10.01.2014	11.02.2014	11.02.2014	11.02.2016	
201.	Farid Shah No. 247	Nowshera	10th	03.05.1965	19.03.1985	16.01.2014	11.02.2014	11.02.2014		Rank of Inspector restored vide order No.1823-53/E-II, dated 29.08.2017.
202.	Mukhtiar Ali No. P/250	Mardan	BA	21.04.1978	30.10.2006	01.01.2010	11.02.2014	11.02.2014	11.02.2016	
203.	Ghaffar Ali No. P/231	Peshawar	FA	03.02.1969	13.08.1987	27.09.2011	11.02.2014	11.02.2014	11.02.2016	
204.	Nabi Shah B/37	Lakki	10th	08.08.1963	15.11.1981	31.05.2013	05.11.2014	05.11.2014	05.11.2016	
205.	Asif Sharif No. P/23	Peshawar	MSC	05.09.1977	30.10.2006	02.08.2013	05.11.2014	05.11.2014		
206.	Muhammad Jalil No. B/44	Bannu	BA	03.03.1970	01.04.1990	13.12.2013	05.11.2014	05.11.2014	05.11.2016	
207.	Gul Rauf No. B/90	Bannu	BA	08.04.1977	01.02.2002	13.12.2013	05.11.2014	05.11.2014	05.11.2016	
208.	Waqar Ahmad B/44	Bannu	MA	20.09.1979	13.01.2004	13.12.2013	05.11.2014	05.11.2014	05.11.2016	
209.	Gul Sher Khan MR/99	Swabi	10th	03.03.1968	01.10.1986	13.12.2013	05.11.2014	05.11.2014	05.11.2016	
210.	Muhammad Ajmal H/72	Manshehra	MA	01.01.1967	07.06.1987	25.07.2009	05.11.2014	05.11.2014	05.11.2016	
211.	Azmat Ali No. K/200	Kohat	FA	01.04.1978	25.02.1998	10.01.2014	05.11.2014	05.11.2014	05.11.2016	
212.	Umar Gul No. MR/59	MKD Agency	10th	14.02.1970	03.04.1991	28.01.2014	05.11.2014	05.11.2014	05.11.2016	
213.	Imran Feroq No. MR. 62	Mardan	BA	11.10.1967	01.12.1991	28.01.2014	05.11.2014	05.11.2014	05.11.2016	
214.	Farooq Zaman No. MR/02	Swabi	MA	01.04.1979	27.03.2003	11.03.2014	05.11.2014	05.11.2014	05.11.2016	
215.	Fazal Subhan No. MR/15	Charsadda	10th	15.12.1968	20.09.1988	11.03.2014	05.11.2014	05.11.2014	05.11.2016	
216.	Muhammad Sareer No. MR/27	Swabi	FA	20.10.1966	01.01.1987	11.03.2014	05.11.2014	05.11.2014	05.11.2016	
217.	Kausar Khan No. MR/21	Charsadda	FA	03.04.1968	15.08.1988	11.03.2014	05.11.2014	05.11.2014	05.11.2016	
218.	Fahim Bacha No. MR/44	Mardan	FA	02.01.1983	28.02.2006	11.03.2014	05.11.2014	05.11.2014	05.11.2016	
219.	Fazal Sher No. MR/07	Swabi	10th	18.03.1970	25.09.1988	11.03.2014	05.11.2014	05.11.2014	05.11.2016	
220.	Jehangir Khan No. H/11	Abbottabad	B.Sc	20.01.1980	16.10.2006	31.03.2014	05.11.2014	05.11.2014	05.11.2016	
221.	Muhammad Arshad No. H/41	Manshehra	MA	15.03.1974	01.09.1992	31.03.2014	05.11.2014	05.11.2014	05.11.2016	
222.	Muhammad Tahir No. H/56	Haripur	BA	19.10.1966	05.09.1991	31.03.2014	05.11.2014	05.11.2014	05.11.2016	




 Registrar


 O/S E-II


 Assistant E-II

20

Ammed - 9

1256
18-2-2022
Peshawar

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Dated Peshawar the 18/02/2022

NOTIFICATION

No. CPD/E-II/Promotion/332 In pursuance of the provision contained in Section-5 of the Promotion Rules-2007 and on the recommendations of Departmental Selection Committee meeting held on 15th February, 2022, the following Inspectors (BS-16) (Executive & Technical) of Khyber Pakhtunkhwa Police are hereby promoted to the rank of Deputy Superintendent of Police (BS-17) on regular basis with immediate effect.

The officers on promotion shall remain on probation for a period of one year in terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1999.

The promotion shall take effect from the date they actually assume the charge of their higher responsibilities:-

S#	Name of officers & No.	S#	Name of officers & No.
1.	Mr. Azmat Ali No. K/200	17.	Mr. Luqman Khan No. MR/80
2.	Mr. Muhammad Sohail No. H/07	18.	Mr. Ikhilraz Khan No. MR/81
3.	Mr. Muhammad Amin No. H/42	19.	Mr. Zar Badshah No. MR/82
4.	Mr. Abdullah Jan No. P/182.	20.	Mr. Muhammad Fazil No. MR/83
5.	Mr. Nasrullah Khan No. P/185	21.	Mr. Imliaz Ali No. MR/84
6.	Mr. Muhammad Kamran No. P/188	22.	Mr. Sadal Khan No. K/25
7.	Mr. Sajid Mumtaz No. P/189	23.	Mr. Fazal Hanif No. K/48
8.	Mr. Fida Hussain No. P/190	24.	Mr. Nazar Hussain No. K/70
9.	Mr. Ijaz Ali No. P/191	25.	Mr. Muhammad Yousaf No. K/71
10.	Mr. Zakaullah No. P/192	26.	Mr. Nazir Khan No. K/72
11.	Mr. Taj Muhammad Khan No. P/193	27.	Mr. Abid Khan No. K/74
12.	Mr. Ijaz Ali No. P/194	28.	Mr. Umar Hayat No. K/20
13.	Mr. Adnan Azam No. P/195	29.	Mr. Muhammad Akbar No. MR/85
14.	Mr. Zahid Alam No. P/196	30.	Mr. Zareef Khan No. MR/87
15.	Mr. Rehmaulillah No. P/197	31.	Mr. Asif Mahmood No. B/01
16.	Mr. Muhammad Inam Jan No. MR/59	32.	Mr. Sabir Gul No. MR/90
33.	Mr. Zulfiqar Ahmad (Technical Special Branch)		

Their posting Notification will be issued separately.

Note:-

1. The DSC meeting held on 19.08.2020 recommended Mr. Muhammad Sohail No. H/07 to be deferred from promotion to the rank of DSP (BPS-17) because he had not completed mandatory period in a Unit specified as per amended Police Rule 13.16A dated 16.03.2017. At the time of meeting, he was serving in ACE, therefore the Committee directed that he will be promoted once he earns good AGR for a calendar year from any specified Unit. Subsequently in compliance of the DSC decision, he was transferred to Special Branch on 19.04.2021. Mr. Muhammad Sohail No. H/07 is also promoted to the rank of DSP w.e.f 19.04.2022; on successful completion his mandatory period as per amended Police Rule 13.16A.

2. Mr. Abdullah Jan No. P/182 is conditionally and provisionally subject to the outcome of CPLA No.643-P/2021 dated 30.08.2021 in compliance of Execution petition No.227/2021 in Service Appeal No. 291/2019 and Order Sheet dated 10.01.2022 of Khyber Pakhtunkhwa Service Tribunal.

Sd/-
(SABIR AHMED) PSP
Additional Inspector General of Police,
Headquarters, Khyber Pakhtunkhwa.

Endst: No. & date even.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. All Addl: Inspectors General of Police in Khyber Pakhtunkhwa.
3. All Deputy Inspectors General of Police in Khyber Pakhtunkhwa.
4. All Heads of Units, in Khyber Pakhtunkhwa.
5. All Regional Police Officers, in Khyber Pakhtunkhwa.

Ahmed
Mansoor

(21)

Annex - H

BEFORE HONOURABLE PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA PESHAWAR

(Through proper channel)

REVIEW/REPRESENTATION AGAINST NOTIFICATION NO.CPO/
E-I/PROMOTION/332 DATED 18-02-2022 OF THE PPO KPK
PESHAWAR WHEREBY APPELLANT'S JUNIOR HAS BEEN
PROMOTED TO THE RANK OF D.S.P (BPS-17) IGNORING THE
PETITIONER WITHOUT ANY REASON.

PRAYER: ON ACCEPTANCE OF INSTANT REVIEW PETITION/
REPRESENTATION IMPUGNED NOTIFICATION DATED 18-02-
2022 MAY KINDLY BE MODIFIED TO THE EXTENT OF
PROMOTING THE PETITIONER AS D.S.P (BPS-17) WITH
EFFECT FROM 18-02-2022 WHEN HIS JUNIOR WAS
PROMOTED ACCORDING TO SENIORITY WITH GRANT OF ALL
CONSEQUENTIAL SERVICE BACK BENEFITS.

Respected Sir,

With most veneration the following few lines are laid down
for your kind consideration and favorable order:-

1. That petitioner was enrolled in the Sind Police Force in the year 1987 and along-with his batch-mates/colleagues he was promoted to and confirmed in the rank of Sub Inspector. Thereafter on his request the petitioner was transferred vide order dated 03-12-2013 from Sind Police to the Khyber Pakhtunkhwa police and posted in Hazard Region vide orders dated 26-12-2013 respectively. (Copies of both the orders dated 03-12-2013 and 26-12-2013 are attached as "A & B").
2. That vide KPK Provincial Police Officer Peshawar Notification dated 05-11-2014 the petitioner was ordered to be brought on promotion list "F" as recommended by the DPC meeting held on 16-10-2014. His name was placed at

*Alister
Mansoor*

22

S/No.7 of the Notification and above the name of SI Azmat Ali No. K/200. (Copy of Notification dated 05-11-2014 is attached as "C").

3. That similarly the revised seniority list "F" of KPK Inspectors/Sub Inspectors as stood on 06-04-2015 prepared, issued and circulated on 30-06-2015 the name of petitioner is incorporated at Serial No. 333 of Page-11 of the list above the name of Ofg Inspector Azmat Ali No. K/200. (Copy of relevant page No.11 of List "F" dated 30-06-2015 is as "D").
4. That subsequently the petitioner alongwith his batch-mates was confirmed as Inspector vide KPK PPO/IGP Peshawar Notification dated 10-04-2016 placing his name S/No.7 above the name of Inspector Azmat Ali No. K/200. (Copy of Notification dated 10-04-2016 is attached as "E").
5. That in the year 2018 another revised seniority list "F" of KPK Inspectors/Sub Inspectors as stood on 22-06-2018 was prepared, issued and circulated wherein the name of petitioner is also placed at S/No. 210 also above the name of said Inspector Azmat Ali No. K/200. (Copy of revised seniority list "F" dated 22-06-2018 is attached as "F").
6. That despite the fact that according to Police Rules the petitioner fulfilled all the requirements for promotion but was not considered with his batch-mates/colleagues for promotion as DSP (BPS-17) by the competent authority while promoting his junior the said Inspector Azmat Ali No. K/200 as DSP (BPS-17) vide Notification No. CPO/E-

Accepted
M. H. Khan

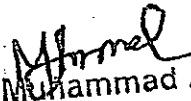
(73)

I/Promotion/332 dated 18-02-2022. (Copy of Notification dated 18-02-2022 is attached herewith as "G").

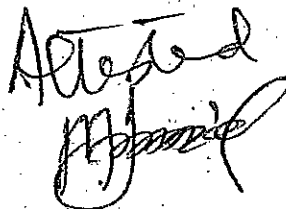
7. That appellant has rendered about 33 years service in the police department. He has always performed his assigned duties with devotion, dedication and honesty to the entire satisfaction of his superiors and never provided a chance of reprimand. Due to his tremendous services on occasions the appellant has been awarded with Commendation Certificates and Cash Rewards by his worthy High-Ups. Petitioner has unblemished rather meritorious service record at his credit.

It is, therefore, humbly requested that keeping in view the aforementioned facts and circumstances impugned Notification dated 18-02-2022 may graciously be modified to the extent of promoting the petitioner as DSP (BPS-17) with effect from 18-02-2022 as per seniority when his juniors were promoted with grant of all consequential service back benefits. Thanking you sir in anticipation.

Your Obedient Servant


(Muhammad Ajmal)
Inspector No.H/72
PTC Mansehra

Dated 18-02-2022





(24)

OFFICE OF THE *Amir - J*
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR. *EL*

No. CPO/CPB/196

Dated Peshawar

27 April, 2022.

To: The Assistant Inspector General of Police,
Training, Khyber Pakhtunkhwa.

Office of The
Inspector General Of Police
Training, Khyber Pakhtunkhwa

Dy. No. 1274 Trg

Subject: PRESENTATION FOR SENIORITY.

U. 27.4.22

Memo:-

Please refer to your office letter No. 3220-21/Trg: dated 28.03.2022 on the subject notice above.

In this regard, it is submitted that application of Inspector Muhammad Ajmal No. H/72 regarding seniority was processed and filed by the Competent Authority because the applicant transferred from Sindh Police to KP Police on the condition that he will be placed at the bottom of seniority and will not claim further seniority.

The applicant may be informed accordingly.

[Signature]
(NOOR AFGHAN)
Registrar,

For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar. *[Initials]*

OFFICE OF THE DEPUTY INSPECTOR GENERAL OF POLICE TRAINING
KHYBER PAKHTUNKHWA

No. 4408 Trg

Dated 09 10/5/2022

Copy of above is forwarded to Director Police Training School, Manshra for information and the applicant may be informed accordingly.

[Signature]
(Dr. Quraish Khan)PSP, PhD
Assistant Inspector General of Police
Training, Khyber Pakhtunkhwa

[Signature]
[Signature]



29

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

Amir - J

EC

No. CPO/CPB/196

Dated Peshawar

27 April, 2022.

Office of The
Inspector General of Police
Training, Khyber Pakhtunkhwa
Peshawar

To: The Assistant Inspector General of Police,
Training, Khyber Pakhtunkhwa.

Us: No. 1974

Subject: PRESENTATION FOR SENIORITY.

U: 27.4.22

Memo:-

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(NOOR AFGHAN)

Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

OFFICE OF THE DEPUTY INSPECTOR GENERAL OF POLICE TRAINING
KHYBER PAKHTUNKHWA

No. 4408 /Trg

Dated 09 10/5/2022

Copy of above is forwarded to Director Police Training School, Mansehra for information and the applicant may be informed accordingly.

(Dr. Quraish Khan)PSP, PhD
Assistant Inspector General of Police
Training, Khyber Pakhtunkhwa

Attested
[Signature]