

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.511/2022

Yaqoob Ur Rehman.....Appellant.

Versus

The Provincial Police Officer,
Khyber Pakhtunkhwa and othersRespondents.

**REJOINDER ON BEHALF OF APPELLANT IN
RESPONSE TO REPLY FILED BY RESPONDENTS.**

Respectfully Sheweth,

Preliminary Objections:

Preliminary objections raised by answering respondents are erroneous and frivolous in nature as having no factual and legal backing. The answering respondents has failed to show as to why appellant has no cause of action and locus standi to file the instant appeal ? How the appeal is not maintainable in its present form and how the appellant has not come to the Court with clean hands ? How the appeal is bad for mis-joinder and non-joinder of necessary parties ? How the principle of estoppel is applicable against the appellant ? How the appeal is bad in the eyes of law ? and not maintainable ? and how the appeal is time barred ? In absence of any factual or legal support with reference to the preliminary objections raised by the respondents; proper rejoinder cannot be made and submitted. However, the impugned order has adversely effected the service career of the appellant and for which a remedy has been provided u/s 4 of the Services Tribunal Act, 1973 read with Police Service Rules, 1934 therefore, appellant has prima facie cause of action and locus standi to file appeal before this Hon'ble Tribunal. Appellant has placed all material facts before this Hon'ble

Tribunal and has concealed nothing from the notice of this Hon'ble forum.
The appeal is maintainable in all respect.

Facts:

1-29. That reply to Para No.1 to 29 are incorrect, vexatious, flimsy in nature and spirit having no legal and factual backing. The answer to the plea raised by the respondents has already been elaborately explained by the appellant in his memo of service appeal and therefore needs no further elucidation.

However, the plea of the respondents with respect to the decision of the alleged competent authority notified by AIG / Establishment vide Ends. No. 2288-2320/E-IV dated 24-02-2015 is concerned. In this respect it is humbly submitted that the Hon'ble Peshawar High Court, Peshawar vide Judgment dated 24-01-2018 in WP. No. 1952-P/2015 has already been set aside the said decision. The pray portion of the writ petition which has been reproduced vide para No.1 of the Judgment *ibid* are as follows;

“On acceptance of this Writ Petition an appropriate Writ may please be issued declaring the decision of the Committee dated 24.02.2015, whereby the petitioners are required to again appear in B-1 examination scheduled to be held on 06.06.2015, is illegal, unlawful, without lawful authority and of no legal effect, the petitioners having undergone the B-1 examination besides qualified the lower course from PTC Hangu and have been promoted as Head Constables, are not required to again appear in B-1 examination.”

The Hon'ble Peshawar High Court vide Para No.9 of the Judgment *ibid* has clearly declared the letter dated 24-02-2015 as illegal, unlawful, without

lawful authority and has no legal effect as the petition was allowed as prayed for.

From the bear perusal of the Judgment ibid the stance of the respondents that the letter dated 24-02-2015 is applicable to the appellant and that's why their seniority was fixed with the candidates who had passed lower school course in the last term of 2014, has become infructuous.

Since letter dated 24-02-2015 is no more in the field therefore, appellant could not be treated on the basis of letter dated 24-02-2015.

It is settled principle of law that neither IGP nor the decision of the Police Policy Board Meeting can override Rule 13.8 of the Police Rules, 1934. This aspect has been elaborately explained by the Hon'ble Supreme Court of Pakistan vide reported Judgment 2022 PLC (C.S) 889. The Hon'ble Supreme Court of Pakistan has declared that the terms and conditions of a civil servant could not be changed, altered or amended through a simple notification. The Hon'ble Supreme Court of Pakistan vide the said Judgment has declared that for any amendment, alteration or change, as the case may be, there must be statutory backup in the light and spirit of Article 240 of the Constitution of Islamic Republic of Pakistan, 1973. In the instant case, the letter dated 24-02-2015 has neither any statutory backing nor has been approved by the Govt. of Khyber Pakhtunkhwa. The Hon'ble Supreme Court of Pakistan vide reported Judgment 2011 SCMR 408 has held that the Standing Order or any other circular effecting the terms and conditions of a Police Officer issued by the Inspector General of Police have to be approved by the Provincial Government. This aspect has been also elaborated by the Hon'ble Sind High Court vide para No.13 of the reported Judgment 2021 PLC (C.S) 415. Since the letter dated 24-02-2015 has neither been approved by the Govt. of Khyber Pakhtunkhwa nor does the same have any sanctity in the light of the Judgment 2022 PLC (C.S) 889.

For the sake of arguments it is also humbly submitted that the decision contained in letter dated 24-02-2015 to the effect that the Seniority of the appellant on Promotion List C-1 was to be counted with candidates who qualified their lower school course in the last term of 2014, was applicable to those candidates who had failed in B-1 examination mandatory for undergoing lower school course. Appellant had already passed his B-1 examination before undergoing lower school course and therefore, the decision contained in the letter dated 24-02-2015 was not applicable to the appellants. The decision was limited only for those candidates who were failed in B-1 examination before completion of their lower school course. The letter dated 24-02-2015 has also been interpreted by the respondents as respondents has never summoned appellant to reappear in Special B-1 examination scheduled on 06-06-2015 in the light of the letter in question (24-02-2015).

So far the letter No.1427/Legal dated 05-03-2020 annexed by the respondents with their parawise comments also support the claim of the appellants. It is also pertinent to explain the said letter has been communicated in response to the letter No.1381/EC dated 24-02-2020 (already annexed with memo of appeal as annexure-I, page-62), wherein advice was sought as to how to fix the seniority of the appellant.

It is also pertinent to mention here that vide letter No.1836/GC dated 19-03-2020, wherein advice as to the seniority of the appellants were sought on the ground that since the appellant have already passed B-1 examination before undergoing lower School Course and that is why they have not been summoned to undergo special B-1 examination. In response to the said letter, AIG Legal vide Letter No.1836/Legal dated 16-04-2020 has confirmed that the seniority of the appellant shall be fixed with their colleague with whom they undergone lower School Course in 2013. All the

relevant letters are already attached with main appeal and lie at page no.62 to 65.

The seniority of the appellant remained intact till the constitution of local committee dated 02-04-2021. The committee in violation of the advice of the AIG legal recommended that the seniority of the appellants shall be fixed as per impugned letter dated 24-02-2015 and resultantly the seniority of the appellant was disturbed. Appellant made representation to the respondent No.1. Respondent No.1 sought comments from respondent No.3, who vide letter No.1375/EC dated 29-04-2021 submitted detailed report. In response to the said letter AIG Establishment vide letter No.4905/E-IV dated 07-05-2021 again directed respondent No.3 to fix the seniority of the appellant with their colleagues, who had under gone Lower School Course in 2013. Respondent again sabotaged the directions of the competent forum. All relevant documents are already attached with main appeal from page no.66 to 77.

So far the seniority of the appellants on promotion list C-1 is concerned; the seniority list (**Annexure-RJ/A**) shows that total of 20 LHC Constables on promotion list C-1 were summoned for promotion to the post of Head Constable in the year 2019, wherein incumbent from serial No.1 to 8 were promoted as Head Constables and whereas the remaining were left for the next DPC meeting. In the said seniority list, appellant lies at serial No.17 and whereas colleagues appellant are lying at serial No.12 (Yaqoob Ur Rehman) and Muhammad Nawaz at serial No.15 and whereas private respondent namely Umer Zada is at serial No.19 and whereas Arif Ullah is at serial No.20. It means that appellant was senior to private respondent in the seniority list of 2019. It is also pertinent to mention that appellant has passed his lower School Court in term ending 20-03-2014 and whereas the private respondent has passed lower school course in the term ending 30-07-2014.

The seniority of the appellant remained intact in the subsequent seniority list (**Annexure-RJ/B**). Appellant lie at serial No.4 and whereas private respondent are at serial No.11 to 20.

That the next DPC meeting was held on 08-04-2021, wherein the private respondent were made senior to the appellant and were also promoted to the post Head Constable. (**Annexure-RJ/C**)

Petitioner continuous senior position was disturbed in consequent of the recommendations of secretly constituted committee. The documents of the committee are already available in the main service appeal at page no.66 and 67.

The seniority position of the appellant has been disturbed without any notice to the appellant and appellant has been condemned unheard. The recommendation of the committee was in violation of AIG Legal letter No.1836 dated 16-04-2020.

Now appellant has been downgraded in the final seniority list and lie at serial No.29 of the seniority list, which is impugned before this Hon'ble Tribunal. (Seniority list is attached as **Annexure-RJ/D**)

Grounds:

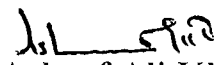
That reply to Grounds A to H are mere repetition of the facts therefore no need of further elucidation. Appellant relies on the grounds already been incorporated in the main appeal and the Judgments of the Apex Courts cited above in the instant rejoinder. Appellant has not been treated in accordance with law, rules and policy on subject. The vested rights of the appellant with respect to his seniority on promotion list has been violated by the respondents on the flimsy ground of the letter dated 24-02-2015 which itself does not hold field. The seniority granted to the private respondents was totally time barred. The senior position of the appellant on the seniority list remained intact since 20-03-2014 till 02-04-2021. The private respondents have never questioned the seniority of the appellant for the last 07++ years

therefore, the principle of estoppel and acquiescence lies against the private respondents and the official respondents. The impugned seniority was amended at the time of promotion therefore, the act of respondents is based on malafide.

It is, therefore, humbly prayed that the reply of answering Respondents may kindly be rejected and the appeal as prayed for may graciously be accepted with all back benefits.

Through

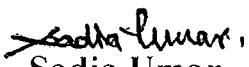

Appellant


Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

&

Ali Bakht
Advocate, Peshawar

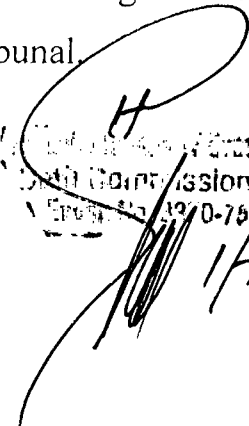
&


Sadia Umar
Advocate, Peshawar

Dated: ___/___/19/2022

Affidavit

I, Yaqoob Ur Rehman LHC No.773, Police Force Karak do hereby affirm and declare on oath that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


Yaqoob Ur Rehman
1/12/2022


Deponent

Ann - RJ/A

POLICE DEPARTMENT

KARAK DISTRICT

SERVICE PARTICULAR OF C-1 CONSTABLES FOR PROMOTIONS AS HEAD CONSTABLES. As on 30-12- 2019

S.No.	Name & Numbers	Seniority Position according to Term Ending	Order of Merit	Edn	Remarks
1.	Wasif Ullah No 838/LHC	20-03-2013	83	BA	Promoted As HC
2.	Farman Ullah No-828/LHC	20-03-2013	382	10 th	Promoted As HC
3.	Amjed Ali No.506/LHC	20-03-2013	392	10 th	Promoted As HC
4.	Abid Rehman No.54/LHC	20-09-2013	64	MA	Promoted As HC
5.	Najeeb Ullah No.46/E.F / LHC	20-09-2013	75	FA	Promoted As HC
6.	Muhammad Arif No.4717/E.F/LHC	20-09-2013	107	BA	Promoted As HC
7.	Umer Badshah No.690/LHC	20-09-2013	151	FA	Promoted As HC
8.	Muhammad Jabbar No.85/E.F/LHC	20-09-2013	162	BA	Promoted As HC
9.	Lal Rehman No. 729	20-12-2013	14	10 th	Un-qualified for promotion due to B-1 failure vide CPU ltr no 2236-60/E-IV dated 21-02-2017
10.	Majid Khan No.558	20-03-2014	13	BA	
11.	Mohib Ullah No.514	20-03-2014	44	BA	
12.	Yaqoob Ur Rehman No. 773	20-03-2014	63	BA	
13.	L/Const. Gohar Kalsoom No 557	20-03-2014	73	BA	
14.	Muhammad Zafran No. 832	20-03-2014	87	10 th	
15.	Muhammad Nawaz No.832	20-03-2014	122	FA	
16.	Naseeb Ullah No-1136/CTD	20-03-2014	138	MA	
17.	Muhammad Fayaz No. 414	20-03-2014	187	FA	
18.	Hidayat Ullah No.379	20-03-2014	189	FA	
19.	Umer Zada No.611	30-07-2014	18	BA	
20.	Arif Ullah No. 188	30-07-2014	22	FA	

Ann-RJ/B

POLICE DEPARTMENT

KARAK DISTRICT

SENIORITY LIST OF C-I CONSTABLES ACCORDING TO LWER SCHOOL HISTORY SHEETS PTC HANGU. As on 02-04-2021

S.No.	Name & Numbers	Seniority Position according to Term Ending	Order of Merit	Edn	ENTRIES		
					Good	Major	Minor
1.	Lal Rehman No.729	20-12-2013	14	10 th	1		
2.	Majid Khan No.558	20-03-2014	13	BA	2		
3.	Mohib Ullah No-514	20-03-2014	44	BA	2		
4.	Yaqoob Ur Rehman No-773	20-03-2014	63	BA	2		
5.	L/Const: Gohar Kalsoom No-557	20-03-2014	73	BA	07		
6.	Mohammad Zafran No-72/E.F	20-03-2014	87	10 th			01
7.	Muhammad Nawaz NO-832	20-03-2014	122	FA	01		01
8.	Naseeb Ullah No-1136	20-03-2014	138	MA			
9.	Muhammad Fayaz No-414	20-03-2014	187	FA	04		
10.	Hidayat Ullah No-379	20-03-2014	189	FA	04		
11.	Umer Zada No-611	31-07-2014	18	BA	01		02
12.	Arif Ullah No-188	31-07-2014	22	FA	03		01
13.	Sajjad Iqbal No-515	31-07-2014	26	10 th			02
14.	Akhtar Hayat No-639	31-07-2014	29	FA			
15.	Sirja Ud Din No-519	31-07-2014	38	FA			
16.	Rahim Jan No-226	31-07-2014	42	FA			
17.	Nasreen Begum No-173	31-07-2014	50	BA			
18.	Asif Rehman No-372	31-07-2014	72	FSc			
19.	Ijaz Ahmed No-4456/EF	31-07-2014	76	10 th			
20.	Bahadar Nawaz No-45/E.F	31-07-2014	83	MA			

SERVICE PARTICULAR OF C-1 CONSTABLES FOR PROMOTIONS AS HEAD CONSTABLES. As on 08-04-2021

S.No.	Name & Numbers	Seniority Position according to Term Ending	Order of Merit	Edn	Remarks
1.	Lal Rehman No.729	20-12-2013	14	10 th	Promoted as HC
2.	Majid Khan No.558	20-03-2014	13	BA	Promoted as HC
3.	Mohib Ullah No-514	20-03-2014	44	BA	Promoted as HC
4.	L/Const: Gohar Kalsoom No-557	20-03-2014	73	BA	Promoted as HC
5.	Mohammad Zafran No-72/E.F.	20-03-2014	87	10 th	Promoted as HC
6.	Naseeb Ullah No-1136	20-03-2014	138	MA	Promoted as HC
7.	Hidayat Ullah No-379	20-03-2014	189	FA	Promoted as HC
8.	Umer Zada No-611	31-07-2014	18	BA	Promoted as HC
9.	Arif Ullah No-188	31-07-2014	22	FA	Promoted as HC
10.	Sajjad Iqbal No-515	31-07-2014	26	10 th	Promoted as HC
11.	Akhtar Hayat No-639	31-07-2014	29	FA	Promoted as HC
12.	Sirja Ud Din No-519	31-07-2014	38	FA	Promoted as HC
13.	Rahim Jan No-226	31-07-2014	42	FA	Promoted as HC
14.	Nasreen Begum No-173	31-07-2014	50	BA	Promoted as HC
15.	Asif Rehman No-372	31-07-2014	72	FSc	
16.	Ijaz Ahmed No-4456/EF	31-07-2014	76	10 th	
17.	Bahadar Nawaz No-45/E.F	31-07-2014	83	MA	
18.	Khalid Ayub No-1184/E.F	31-07-2014	100	BA	
19.	Anwar Jamil No-658	31-07-2014	110	10 th	
20.	Zia Ur Rehman No-634	31-07-2014	111	BA	

Amx-RJ/D

POLICE DEPARTMENT

KARAK DISTRICT

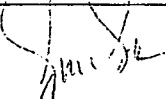
SENIORITY LIST OF C-I CONSTABLES ACCORDING TO LWER SCHOOL HISTORY SHEETS PTC HANGU. As on 02-04-2021

S.No.	Name & Numbers	Seniority Position according to Term Ending	Order of Merit	Edn	Remarks
1.	Bahadar Nawaz No-45/E.F	31-07-2014	83	MA	
2.	Khalid Ayub No-1184 /E.F	31-07-2014	100	BA	
3.	Anwar Jamil No-658	31-07-2014	110	10 th	
4.	Nasreen Begum No-173	31-07-2014	50	BA	
5.	Asif Ur Rehman No-372	31-07-2014	72	FSc	
6.	Ijaz Ahmed No-4456/E.F	31-07-2014	76	10 th	
7.	Zia Ur Rehman No-634	31-07-2014	111	BA	
8.	Fazal Mehmood No-565	31-07-2014	114	BA	
9.	Muhammad Asif Aziz No-445/E.F	31-07-2014	117	10 th	
10.	Saif Ullah No.201-FRP		119	MA	
11.	Nasir Iqbal No.567	31-07-2014	120	BA	
12.	Khaluiq Zaman No.526	31-07-2014	122	MA	Elite Force
13.	Danish Sarwar No.2268/E.F	31-07-2014	130	FSc	Elite Force
14.	Rehman Ullah No.598	31-07-2014	130	FA	
15.	Faiz Muhammad No 4117/E.F	31-07-2014	140	FSc	Elite Force
16.	Muhammad Atif No-464/E3F	31-07-2014	142	10 th	Elite Force
17.	Arshad Tajmal No 132/	31-07-2014	158	MA	
18.	Najeeb ullah No-93/E.F	31-07-2014	172	10 th	Elite Force
19.	Altaf Hameed No.626	31-07-2014	178	MA	
20.	Misbah ullah No-747	31-07-2014	185	BSc	
21.	Shahid Ullah No-201	31-07-2014	199	FA	Elite Force
22.	Haider Ali No-156	31-07-2014	207	10 th	
23.	Asif Farooq No-453/E.F	31-07-2014	286	BA	Elite Force
24.	Raza Ullah No-87/E.F	31-07-2014	309	10 th	Elite Force

25.	Sajid Ullah No-647	30-11-2014	04	FA	
26.	Zahid Mehmood No-641	30-11-2014	32		
27.	Mir Shah Alim No-560	30-11-2014	45		
28.	Zafar Iqbal No-418	30-11-2014	60	FA	Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
29.	Yaqoob Ur Rehman No-773	20-03-2014	63	BA	Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
30.	Zahid Mehmood No.24/E.F	30-11-2014	62		
31.	Gul Saeed No-566	30-11-2014	68		
32.	Raheem Ullah No 89/EF	30-11-2014	74		
33.	Nasir Mehmood No.1173/E.F	30-11-2014	78		Lien Transfer to Mardan Seniority given as per PTC Hangu Notification Endst: No 1009-44/S dated 25-05-2015 and Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV dated 24.02.2015
34.	Zia Ur Rehman No-759	30-11-2014	79	FA	Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
35.	Kabir Khan No.4095/E.F	30-11-2014	85		
36.	Wali Rehman No.502	30-11-2014	93		Seniority given as per PTC Hangu Notification Endst No 1009-44/S dated 25.05.2015 and Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
37.	Umar Hayat No.589	30-11-2014	96		Seniority given as per PTC Hangu Notification Endst No 1009-44/S dated 25.05.2015 and Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
38.	Qismat ullah No.192	30-11-2014	97		Seniority given as per PTC Hangu Notification Endst No 1009-44/S dated 25.05.2015 and Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
39.	Gul Haleem No-254	30-11-2014 Fail			Seniority given as per PTC Hangu Notification Endst No 1009-44/S dated 25.05.2015 and Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
40.	Irshad Khan No-691	30-11-2014	113		
41.	Waheed ullah No 460/E.F	30-11-2014	102		
42.	Aman Ullah No.62	30-11-2014	110		
43.	Irshad Khan No-691	30-11-2014	113		
44.	M. Jammeed Nawaz No-832	20-03-2014	122	FA	Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
45.	Iftikhar Ahmed No. 102 (1762/FRP)	30-11-2014	127	BA	Transfer from FRP vide PPO order No.3577-79/E-IV, dated 19-03-2015

46.	Muhammad Iqbal No.4461/E.F	30-11-2014	130		
47.	Nazeer Dad No.618	30-11-2014	136	FSC	Seniority given as per PTC Hangu Notification Endst No 1009-44/S dated 25.05.2015 and Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
48.	Muhammad Anwar No.686	30-11-2014	140		
49.	Sami Ullah No-4464/E.F	30-11-2014	144		
50.	Ata Ur Rehman NO-577	30-11-2014	147		
51.	Tahir Yaqbbo No.761	30-11-2014	166		
52.	Sikandar Nadeem No. 725	20-03-2014	171	10 th	Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
53.	Nasi Ullah No.74/E.F	30-11-2014	172		
54.	Muhammad Zahid Ullah No.752	30-11-2014	174		
55.	Afraseyab No.58/E.F	30-11-2014	179		
56.	Fakhar Zaman No-394	30-11-2014	180	BA	
57.	Ahmed Noor No.3239/E.F	30-11-2014	185		
58.	Ihsan ullah No.678	30-11-2014	186		
59.	Muhammad Fayaz No.414	20-03-2014	187	F.A	Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
60.	Ibraheem Khan No.749/E.F	30-11-2014	190		
61.	Rafi Ullah No.1180/E.F	30-11-2014	210		
62.	Umer Ayaz No. 767	30-11-2014	213	10 th	Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015
63.	Mehtab Ur Rehman No 4460/E.F	30-11-2014	219		
64.	Sher Muhammad No. 356	30-11-2014	227		
65.	Irfan ullah No.4720/E.F	30-11-2014	233		
66.	Zahid ur Rehman No.100/E.F	30-11-2014	241		
67.	Arshad Farooq No.755	30-11-2014	246		
68.	Arshad Habib Ullah No.1182/E.F	30-11-2014	250	B.A	Seniority given as IGP KP Peshawar letter No.2288-2320/E-IV, dated 24-02-2015


SRC/Karak


OHC/Karak

ORDER

On the recommendation of the District Departmental Promotion Committee held on 30.12.2019 in the office of the undersigned. The following HCs already promoted as on adhoc/acting charge basis vide this office O.B. No. 77, dated 03.01.2019 at serial No. 01-08 are hereby regularized as Regular Head Constables against the existing newly sanctioned vacancies of Head Constable vide the WIGP-KP Peshawar letter No. 8653/57/EF/IV dated 30.08.2019: -

S#	Name & Rank	Description
1.	HC Waqar Ahmed No.162	Regular basis
2.	HC Shahid ur Rehman No.123	Regular basis
3.	HC Yasir Ararat No.518/EF	Regular basis
4.	HC Sadar Nawaz No.187	Regular basis
5.	HC Khalid ur Rehman No.330	Regular basis
6.	HC Saif ur Rehman No.709	Regular basis
7.	HC Fayyaz Ahmed No.505	Regular basis
8.	HC Muhammad Ali No.3792/EF	Regular basis

While the following Constables on 1st "C" of this district Police eight constables mentioned at serial No. 09 & 16 are promoted to the rank of Head Constable on adhoc/acting charge basis subject to conditions listed below.

1. The promotion shall be purely temporary.
2. They shall be liable for reversion to the original rank of constable at any time.
3. They shall not challenge their reversion or claim seniority as well as a benefit on the basis of adhoc/acting charge basis promotion before any forum including court.
4. The period served on adhoc/acting charge basis shall not be counting officiating / probation period at any cost.
5. They shall execute an affidavit to the effect of above condition.

S:#	Name & Rank	Description
9.	LHC Wasif Ullah No.838/	Adhoc/Acting Charge basis
10.	LHC Farman Ullah No.828	Adhoc/Acting Charge basis
11.	LHC Amjad Ali No.506/BDU	Adhoc/Acting Charge basis
12.	LHC Abid ur Rehman No.54	Adhoc/Acting Charge basis
13.	LHC Najeem Ullah No.46/EF	Adhoc/Acting Charge basis
14.	LHC Muhammad Arif No.4717/EF	Adhoc/Acting Charge basis
15.	LHC Umar Badshah No.690	Adhoc/Acting Charge basis
16.	LHC Muhammad Jabbar No.230	Adhoc/Acting Charge basis

O.B.No. 525
Dated 3/1/2019


District Police Officer, K

BETTER COPY

ORDER

On the recommendation of the District Departmental promotion committee held on 30-12-2019 in the office of the undersigned the following HCs already promoted as on adhoc/acting charge basis vide this office O.B No 77, dated 03-01-2019 at serial No 1-08 are hereby regularized as Regular Head Constables against the existing newly sanctioned vacancies of Head Constable vide the W/IGP KP Peshawar letter No. 8653/57/EIV dated 30-08-2019:-

S#	Name & Rank	Description
1.	HC Waqar Ahmed No 162	Regular basis
2.	HC Shahid Ur Rehman No-123	Regular basis
3.	HC Yasir Arafat No-518/E.F	Regular basis
4.	HC Sadar Nawaz No-187	Regular basis
5.	Khalid ur Rehman No-330	Regular basis
6.	HC saif Ur Rehman No-709	Regular basis
7.	HC Fayyaz Ahmed No-505	Regular basis
8.	HC Muhammad Ali No-3792/ E.F	Regular basis

While the following constables on list "C" of this District Police eight constables mentioned at serial No.09 to 16 are promoted to the rank of Head Constable on adhoc /acting charge basis subject to conditions listed below:-

1. The promotion shall be purely temporary.
2. They shall be liable for reversion to the original rank of constable at any time.
3. They shall not challenge their reversion or claim seniority as well as a benefit the basis of adhoc /acting charge basis promotion before any forum including court.
4. The period served on adhoc/ acting charge basis shall not be counting officiating / probation period at any cost.
5. They shall execute an affidavit to the effect of above condition.

S#	Name & Rank	Description
9.	LHC Wasif Ullah No-838	Adhoc/ acting charge basis
10.	LHC Farman Ullah No-828	Adhoc/ acting charge basis
11.	LHC Amjed Ali No-506 /BDU	Adhoc/ acting charge basis
12.	LHC Abid Rehman No-54	Adhoc/ acting charge basis
13.	LHC Najib Ullah No-46/E.F	Adhoc/ acting charge basis
14.	LHC Muhammad Arif No-4717/E.F	Adhoc/ acting charge basis
15.	LHC Umar Badshah No-690	Adhoc/ acting charge basis
16.	LHC Muhammad Jabbar No-236	Adhoc/ acting charge basis

O.B No 565

Dated: 30-12-2019

Sdxxx

District Police Officer Karak