

Appeal No. 1156/2013
Saleem Pervez vs Govt

1st July 2022

1. Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General, Mr. Farhaj Sikandar, District Attorney alongwith Mr. Muhammad Khalil, SI for official respondents and private respondent No.11 in person present. Representative of the official respondents submitted that private respondent No.4 was duly informed but he is not present today.

2. At the very onset, the learned counsel for the appellant produced copy of judgment of the august Supreme Court of Pakistan passed in civil appeals No. 537 to 539 of 2013 on 31.07.2013. In paragraph-5 of which it was observed that the persons (Police officers) though confirmed subsequently but their seniority had to be reckoned from the date of their appointment. It was further observed that they could not be treated differently when seniority of many other employees similarly placed had been reckoned from the date of their appointment. When confronted with the situation not only the learned AAG but also the private respondent as well as learned counsel for the appellant agreed that the matter might be remitted to the department for reconsideration of the case of the appellant in the light of the judgment of the august Supreme Court of Pakistan after providing opportunity of hearing to both the sides and then pass a speaking order in accordance with law, rules, and judgments of the august Supreme Court of Pakistan, within sixty days from the receipt of this order under intimation to this Tribunal through its Registrar. The appeal is disposed of in the above terms. Consign.

3. *Pronounced in open court in D.I.Khan and given under our hands and seal of the Tribunal on this 1st day of July, 2022.*



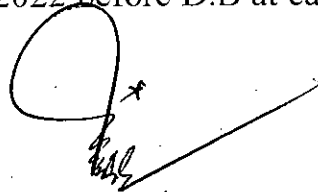
(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

(Mian Muhammad)
Member
Camp Court D.I.Khan

30th June 2022

Appellant alongwith his counsel present. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Muhammad Khalil, SI for official respondents present.

Vide order dated 22.02.2018, respondent No.6 to 10 and 12 were placed ex-parte while respondent No.4,5 and 11 were present in person on the said date but thereafter respondents No. 4 and 5 and 11 did not put appearance. The Tribunal has been informed that respondent No.5 had died, respondent No.4 is posted as SDPO, Pahar Pur and respondent No.11 is posted as SDPO Tank, who are not in attendance. On 26.03.2019, the learned counsel for the appellant had submitted that the grievance of the appellant against respondents No. 17 to 21 stood redressed, therefore, he ~~could~~^{did} not press appeal to that extent. Let in the interest of justice respondent No.4 and 11 be summoned for tomorrow. To come up for arguments on 01.07.2022 before D.B at camp court D.I.Khan.



(Mian Muhammad)
Member(E)



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

25.01.2022

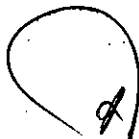
Tour is Cancelled, therefore, case is adjourned to 24.05.2022 for the same as before.



Reader.

24.05.2022

Nemo for the appellant. Mr. Muhammad Khalil, S.I (Legal) alongwith Mr. Farhaj Sikandar, District Attorney for official respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments on 30.06.2022 before the D.B at Camp Court D.I.Khan.


(Rozina Rehman)
Member (J)
Camp Court D.I.Khan

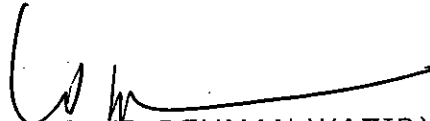

(Salah-ud-Din)
Member (J)
Camp Court D.I.Khan

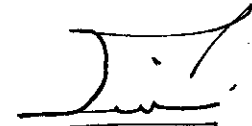
S.A 1156/2013

28.09.2021

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant sought adjournment being not prepared for arguments today. Adjourned. To come up for arguments before the D.B on 23.11.2021 at Camp Court D.I.Khan.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)
CAMP COURT D.I.KHAN



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

23.11.2021

Learned counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Learned counsel for the appellant sought adjournment for preparation of arguments. Adjourned. To come up for arguments before the D.B on 25.01.2022 at Camp Court D.I.Khan.

Member copy of the instant appeal is not available, therefore, learned counsel for the appellant is directed to provide the same complete in all respect on or before the next date of hearing.


(Salah-ud-Din)
Member (J)
Camp Court D.I.Khan


Chairman
Camp Court D.I.Khan

23.02.2021

Petitioner present through counsel.

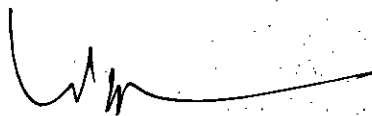
Noor Zaman Khan Khattak learned District Attorney for respondents present.

Arguments on application seeking restoration of appeal heard. Record perused.

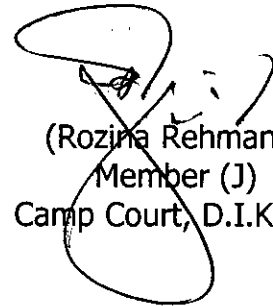
Application in hand was submitted seeking restoration of appeal which was dismissed in default vide order dated 24.09.2019. It was submitted on behalf of petitioner that inadvertently, petitioner had no knowledge of the date of hearing, therefore, neither the petitioner nor his counsel attended the Tribunal and that the absence of petitioner or his counsel was neither intentional nor deliberate.

Being within time, learned A.A.G showed no objection on the acceptance of the instant application.

As per record, appeal was dismissed in default on 24.09.2019 while the instant application seeking restoration was filed on 08.10.2019 which is within time. As such, by acceptance of instant application, appeal stands restored. It be properly registered and this application stands consigned to the record room, copy whereof be placed on original file. To come up for arguments in the main appeal on 25.05.2021 before D.B at Camp Court, D.I.Khan.

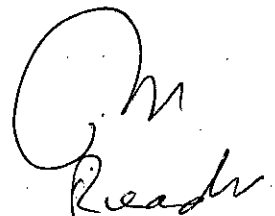


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, D.I.Khan



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

Due to COVID, 19 therefore
to come up for the same on 28/9/21



dated 11.04.2018 he was not reinstated into service. It is the legality and validity of this order which has been challenged by him in the present service appeal filed U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

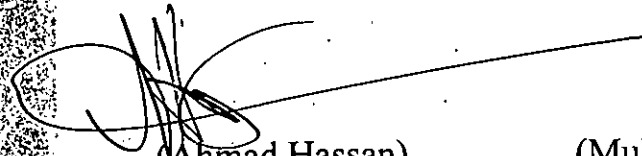
2. Brief facts of the case are that the appellant was appointed as Junior PHC Technician (MP) Insects Collector (BPS-09) vide order dated 25.04.2013. He continued his services till 2015 and it was on 15.04.2015 when his termination order was issued. He, therefore, preferred departmental appeal which was not responded to, hence, he filed service appeal and vide order dated 19.02.2018 of this Tribunal, he was reinstated into service with direction to the respondents to examine his case as to whether he is eligible to hold the post or not and shall dispose of the same after providing opportunity of hearing to the appellant. An application was also submitted to the respondents for implementation of the orders of this Tribunal but to no avail, hence, he filed implementation petition and it was during the pendency of the implementation petition, when the impugned order in respect of his termination was brought into his knowledge. He then withdrew his execution petition and preferred a departmental appeal which was not decided, hence, the instant service appeal.

3. Learned counsel for appellant argued that after fulfillment of codal formalities, appellant was appointed as Junior PHC Technician vide order dated 25.04.2013. He argued that the impugned refusal order dated 11.04.2018 is illegal, against the law and facts as he was properly appointed after observance of all codal formalities. He submitted that his salary form was properly checked and verified by the District Accounts Officer Tank where-after Personnel Computer Salary Number was allotted.

A. No. 1156/13, Saleem Pervez

24.09.2019

Appellant absent. Mr. Farhaj Sikandar, learned Deputy District Attorney present. Case called for several times but the appellant did not turn up. Consequently the present service appeal is hereby dismissed in default. No order as to costs. File be consigned to the record room.



(Ahmad Hassan)
Member





(Muhammad Hamid Mughal)
Member
Camp Court, D.I.Khan

ANNOUNCED.
24.09.2019

23.04.2019

Clerk of counsel for the appellant and Mr. Farhaj Sikandar, District Attorney alongwith Mr. Khalid Nawaz, Inspector (Legal) for official respondents No. 1 to 3 present. Due to strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Adjourn. To come up for arguments on 25.06.2019 before D.B at Camp Court D.I.Khan.



(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan


(M. Hamid Mughal)
Member
Camp Court D.I.Khan

25.06.2019

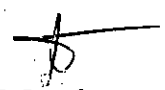
None present on behalf of the appellant. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Attaullah, S.I (Legal) for official respondents present. Notice be issued to appellant and his counsel for attendance for 23.09.2019 before D.B at Camp Court D.I.Khan.

(Hussain Shah)
Member
Camp Court D.I.Khan


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

23.09.2019

None for the appellant present. Mr. Farhaj Sikandar, DDA alongwith Mr. Khalil, SI for respondents present. Due to general strike of the Bar arguments could not be heard. Adjourn. To come up for arguments on 24.09.2019 on before D.B at camp court D.I.Khan.


Member


Member
Camp Court D.I.Khan

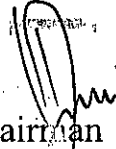
22.01.2019

Miss. Ansa Iqbal, Advocate on behalf of Mr. Fazlur Rahman Balouch, Advocate for appellant and Mr. Farhaj Sikandar, District Attorney alongwith Mr. Khalid Nawaz, Inspector (Legal) for the official respondents present.

Requests for adjournment as learned senior counsel for the appellant is not available today. Adjourned to 26.03.2019 before the D.B at camp court, D.I.Khan.



Member



Chairman
Camp Court, D.I.Khan

26.03.2019

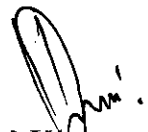
Counsel for the appellant, Mr. Farhaj Sikandar, District Attorney alongwith Mr. Khalid Nawaz Inspector (Legal) for the official respondents, counsel for respondent No. 4, respondent no. 11 with counsel and counsel for respondent No. 18 present.

Mr. Muhammad Ismail Alizai, Advocate has submitted Wakalatnama on behalf of appellant and requested for adjournment in order to prepare the brief. Learned counsel for the appellant also states that grievance of appellant against respondents No. 17 to 21 stands redressed, therefore, he would not press the appeal to their extent.

Adjourned to 23.04.2019 before the D.B at camp court, D.I.Khan.



Member




Chairman
Camp Court, D.I.Khan

27.11.2018

Counsel for the appellant present. Mr. Khalid Nawaz, Inspector (Legal) alongwith Mr. Usman Ghani, District Attorney for official respondents no. 1 to 3 present. Counsel for private respondents is not available today, therefore the case is adjourned to 17.12.2018 for rejoinder/arguments before D.B at camp court D.I.Khan.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

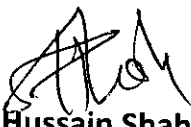
17.12.2018


As per direction of the worthy Chairman Khyber Pakhtunkhwa Service Tribunal, D.I.Khan tour dated 17.12.2018 has been rescheduled and the case is re-fixed for 26.12.2018.


Reader

26.12.2018

Neither appellant nor his counsel present. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Khalid Nawaz, Inspector (Legal) on behalf of official respondents No. 1 to 3, counsel for private respondent No. 11 and private respondent No. 18 in person present. Due to non-availability of appellant and his counsel, the case is adjourned for rejoinder and arguments to 22.01.2019 before D.B at Camp Court D.I.Khan. Notice be also issued to appellant and his counsel for attendance as well as rejoinder and arguments for the date fixed.


(Hussain Shah)
Member
Camp Court D.I.Khan


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

Service Appeal No. 1156/2013

11.09.2018

Neither appellant nor his counsel present. Mr. Ziaullah, Deputy District Attorney alongwith Mr. Khalid Nawaz, Inspector (legal) for official respondents No. 1 to 3 and private respondent No. 11 with counsel present. Private respondents No. 6 to 10, 12 to 17 and 19 to 21 have already been proceeded ex-parte. Private respondents No. 4, 5 & 18 are not in attendance today therefore, notice be issued to them for attendance and arguments for 26.11.2018 before D.B at Camp Court D.I.Khan.



(Ahmad Hassan)
Member
Camp Court D.I.Khan



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

26.11.2018

Counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Khalid Nawaz, Inspector (Legal) for official respondents No. 1 to 3 and private respondent No. 18 alongwith his counsel present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on tomorrow i.e 27.11.2018 before D.B at Camp Court D.I.Khan.



(Ahmad Hassan)
Member
Camp Court D.I.Khan

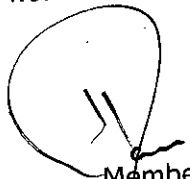


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

21.06.2018

Appellant is not in attendance however, Mr. Muhammad Junaid Khan Advocate present and submitted fresh wakalatnama on behalf of Mr. Fazal Rehman Baloch Advocate. Mr. Khalid Nawaz Inspector legal alongwith Mr. Usman Ghani learned District Attorney for the respondents present. Mr. Abdullah Baloch Advocate for contesting respondent No. 18 present.

Learned counsel for the appellant made a request for adjournment as the learned senior counsel is busy before the Hon'ble High Court and being freshly engaged he has not prepared the case for arguments today. Granted. Being an old case of 2013 the case is adjourned to 24.07.2018 for arguments before the D.B at Camp Court D.I.Khan.


Member


Chairman
Camp Court, D.I.Khan


2-7-18

Tour program is rescheduled, therefore the case is referred on 30-7-18 for the same.


Reader

30.07.2018

Clerk to counsel for the appellant present. Mr. Nazeer Ahmad H.C for the respondents present. Mr. Usman Ghani learned District Attorney also present. Tour program has been cancelled therefore the case is adjourned. To come up for the same on 11.09.2018 before D.B at Camp Court D.I.Khan.


Reader
Camp Court, D.I.Khan

Service Appeal No. 1156/2013

22.02.2018

None present on behalf of the appellant. Mr. Usman Ghani, District Attorney for official respondents No. 1 to 3 and private respondents No. 4, 5, 11 & 18 in person also present. Written reply on behalf of official respondents No. 1 to 3 as well as private respondents No. 4, 5, 11 & 18 already submitted. None present on behalf of remaining private respondents No. 6 to 10, 12 to 17 and 19 to 21 despite issuance of notice hence, proceeded ex-parte. Adjourned. To come up for rejoinder and arguments on 23.04.2018 before D.B at Camp Court D.I.Khan. Notice be also issued to appellant and his counsel for attendance for the date fixed.



(Muhammad Amin Khan Kundi)

Member

25.05.2018

Due to retirement of the worthy Chairman, the Tribunal is non-functional. To come up for the same on 20.06.2018. Notices be issued to the parties accordingly.

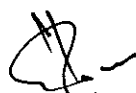
Camp Court D.I. Khan



Member

20.06.2018

Neither the appellant nor his counsel present. Mr. Khalid Nawaz Inspector alongwith Mr. Usman Ghani, learned District Attorney for the respondents present. Being an old case of 2013, adjourned for tomorrow i.e. 21.06.2018 for arguments before the D.B. at camp court D.I.Khan.




Member



Chairman
Camp Court, D.I.Khan


30.11.2017

Counsel for the appellant Mr. Muhammad Junaid, Advocate present and submitted fresh Wakalatnama. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Imtiaz Ali, DSP (legal) for official respondents No. 1 to 3 and private respondents No. 4, 5, 11 & 18 in person also present. Written reply on behalf of official respondents No. 1 to 3 as well as private respondents No. 4, 5, 11 & 18 already submitted. None present on behalf of remaining private respondents No. 6 to 11, 12 to 17 and 19 to 21 therefore, fresh notice be issued to them for attendance and submission of written reply on the next date positively. Adjourned. To come up for written reply/comments on behalf of private respondents No. 6 to 11, 12 to 17 and 19 to 21 on 29.12.2017 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

29.12.2017


Counsel for the appellant present. Mr. Farhaj Sikandar, District Attorney for official respondents No. 1 to 3 and private respondents No. 4, 5, 11 & 18 in person also present. Written reply on behalf of official respondents No. 1 to 3 as well as private respondents No. 4, 5, 11 & 18 already submitted. None present on behalf of remaining private respondents No. 6 to 10, 12 to 17 and 19 to 21 despite issuance of notice therefore, again notice be issued to them for attendance and submission of written reply on the next date positively by way of last chance. Adjourned. To come up for written reply/comments on behalf of private respondents No. 6 to 10, 12 to 17 and 19 to 21 on 22.02.2018 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

Service Appeal No. 1156/2013

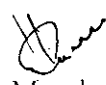
23.08.2017

None present on behalf of the appellant. Mr. Nazir Ahmed, Head Constable alongwith Mr. Farhaj Sikandar, District Attorney for official respondents No. 1 to 3 and counsel for private respondent No. 18 also present. None present on behalf of private respondents No. 4 to 17 & 19 to 21 therefore, fresh notice be issued to the said private respondents for attendance and submission of written reply. Written reply on behalf of official respondents also not submitted. Representative of respondent-department requested for further time for submission of written reply. Adjourned. To come up for written reply/comments on behalf of official respondents as well as private respondents on 27.09.2017 before S.B at Camp Court D.I.Khan. Notice be also issued to appellant and his counsel for attendance for the date already fixed.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

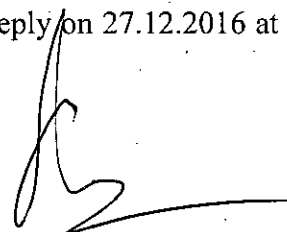
27.09.2017

Appellant in person present. Mr. Farhaj Sikandar District Attorney alongwith Khalid Nawaz Inspector Legal for official respondents and counsel for private respondents No. 4, 5, 11 and 18 also present. No one present on behalf of private respondents, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 19, 20, 21. Notice be issued to private respondents No. 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 19, 20, 21 for attendance and submission of written reply. Requested for adjournment. Request accepted. To come up for written reply/comments on behalf of private respondents on 30.11.2017 before S.B at Camp Court D.I. Khan.


Member
(Judicial)
At Camp Court D.I.Khan

30.08.2016

Clerk to counsel for the appellant, Mr. Farhaj Sikandar, GP for official respondents and private respondents No. 6 and 11 in person present. Private respondent No. 11 requested for time to file written reply. To come up for written reply on 27.12.2016 at camp court D.I Khan.



Member
Camp court D.I. Khan

27.12.2016

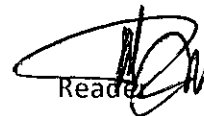
None present on behalf of appellant. Mr. Muhammad Nazir, H.C alongwith Mr. Farhaj Sikandar, Government Pleader for official respondents No. 1 to 3 and private respondent No. 18 in person present. None present on behalf of private respondents No. 4 to 17 & 19 to 21. Fresh notice be issued to the said private respondents for written reply/comments for 29.03.2017 before S.B at Camp Court D.I.Khan.



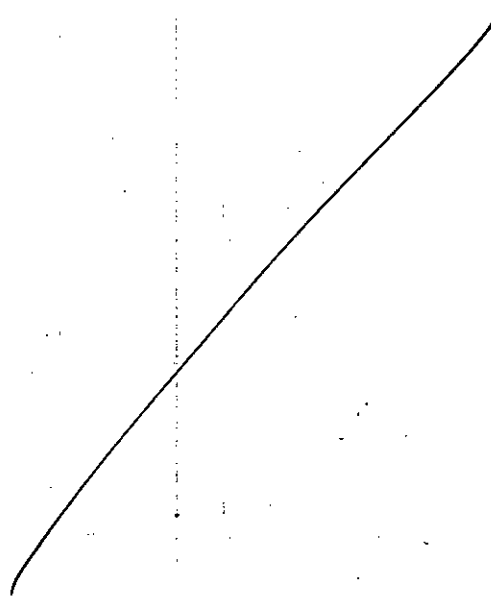
ASHFAQUE TAJ
MEMBER
Camp Court D.I.Khan

29.03.2017

Since tour is hereby cancelled, therefore, the case is adjourned for the same on 23.08.2017.




Read



1156/13

26.10.2015

Counsel for the appellant, Mr. Farhaj Sikandar, GP with Attaullah, SI (Legal) for the official respondents and private respondent No. 11 in person present. Written reply of respondent No. 11 received. To come up for written reply of other private respondents at camp court, D.I.Khan on 28-12-15.


MEMBER
Camp court, D.I.Khan

29.3.2016

Counsel for the appellant and Mr. Farhaj Sikandar, GP with Nazir Aghmad, H.C for respondents present and reply filed. Notices be issued to private respondents through registered post by way of last chance. To come up for written reply of private respondents by way of last chance on 30-8-16 at camp court, D.I.Khan.


MEMBER
Camp court, D.I.Khan

28.4.2015

Junior to counsel for the appellant and Mr. Farhaj Sikandar, GP with Juma Khan, S.I for the official respondents No. 1 to 3 and private respondents No. 4 & 5 in person present. Their written reply is already available on file. Private respondents No. 4 & 5 in person present. Final notices notices be issued to private respondents No. 6 to 21 through registered post. To come up for written reply of respondents No. 6 to 21 without fail on 26.5.2015 at camp court, D.I.Khan.


MEMBER
Camp Court, D.I.Khan.

26.05.2015

Clerk of counsel for the appellant and Mr. Farhaj Sikandar, GP for the official respondents and private respondent no. 11 in person present. Reply not submitted. Fresh notices be issued to other respondents through registered post. To come up for written reply on 28.7.2015 at camp court, D.I.Khan


MEMBER
Camp court, D.I.Khan

28.07.2015

Appellant with counsel, Mr. Farhaj Sikandar, GP with Juma Khan, SI (Legal) for the official respondents. Counsel for private respondent No. 4 & 5, and private respondents No. 8 and 11 in person present and requested for time to file written reply. Written reply of official respondents as well as private respondents No. 4 & 5 are available on file. Fresh notices be issued to other private respondents. Case to come up for written reply/comments of private respondents on 24-08-2015 at camp court, D.I.Khan.


MEMBER
Camp court, D.I.Khan

21.10.2014

Clerk to counsel for the appellant, Mr. Muhammad Adeel Butt, AAG with Khalid Nawaz, ASI for official respondents present. Counsel for private respondents No. 6 & 11 present and Wakalatnama placed on file. Private respondents No. 4 & 5 in person present. Fresh notices be issued to other private respondents. To come up for written reply on 31.12.2014.


MEMBER

31.12.2014

Clerk to counsel for the appellant, and Mr. Muhammad Adeel Butt, AAG for the official respondents present. The Tribunal is incomplete. To come up for the same on 12.3.2015.


MEMBER

12.03.2015

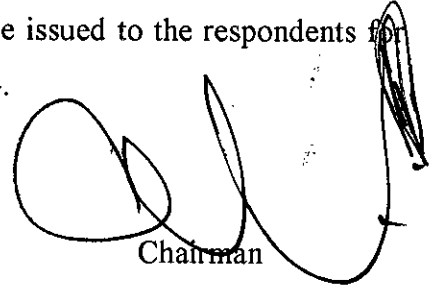
Counsel for the appellant and Mr. Muhammad Bilal, H.C alongwith Addl. A.G for official respondents No. 1 to 3 present. Written reply on behalf of official respondents No. 1 to 3 submitted while private respondent No. 4 and 5 have already submitted written statements. None present for private respondents No. 6 to 11 and 12 to 21. Notice to counsel for private respondents No. 6 to 11 and others respondents be issued for 28.4.2015 before Camp Court D.I.Khan as the matter pertains to territorial limits of D.I.Khan Division.


Chairman

16.5.2014

Mr.Shakeel Ahmad, Advocate present, and filed fresh Wakalat Nama on behalf of the appellant. Notices to the respondents could not be issued due to non-deposit of security amount and process fee. The learned counsel for the appellant requested for further time. The security amount and process fee be deposited within a week, where-after notices be issued to the respondents for written reply/comments on 27.8.2014.

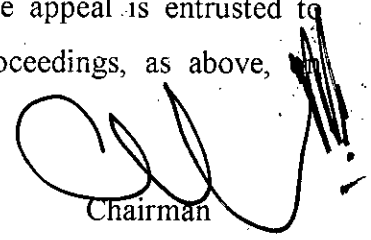
Appellant Deposited
Security & Process Fee
Rs.....5,400.....Bank
Receipt is Attached with File.



Chairman

27.8.2014

Counsel for the appellant present. Official respondents No. 1 to 3 are not present despite their service through concerned officials. However, Mr. Muhammad Adeel Butt, Additional Advocate General is present on behalf of the official respondents and would be contacting them for written reply/comments. Private respondents No. 6 and 8 are present in person and filed Wakalat Nama on behalf of private respondent No. 18 alongwith application for transfer of appeal from the Principal Seat to Camp Court D.I. Khan on their own behalf as well as on behalf of private respondents No. 4, 11, 14, 15 and 19. A copy of application for transfer is handed over to the learned counsel for the appellant for reply and arguments/consideration on the application, as well as written reply/comments on behalf of official as well as private respondents on 23.12.2014. The learned counsel for the appellant pointed out that another appeal of the appellant (Service Appeal No. 748/2013) is pending before learned Primary Bench for preliminary hearing on 21.10.2014 and that since he has to travel all the way from D.I. Khan to make appearance in the said appeal as well, the learned counsel therefore requested for fixation of this appeal on the said date. This Bench will be on tour to Abbottabad on 21.10.2014. Therefore, on the request of learned counsel for the appellant, not objected to by the learned AAG and private respondents, the appeal is entrusted to learned Member Bench-II for further proceedings, as above, 21.10.2014.




Chairman

Appeal No. 1156/2013
Mr. Sulman Pervez


6. 25.02.2014

Counsel for the appellant present. Preliminary arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned seniority list issued by respondent No.2 dated 11.02.2013 vide which the appellant has been placed junior to respondents No.4 to 21, which is against the law/rules. The learned counsel for the appellant argued before the Court that despite the fact that the appellant stood first in KPK, Public Service Commission, even then he was placed at the bottom in the impugned seniority list. Similarly, the departmental appeal filed by the appellant against the impugned seniority list was also not decided within the statutory period of 90 days, hence instant appeal be admitted for regular hearing.

Since points raised by the learned counsel for the appellant need further consideration, hence admit for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 16.05.2014.


Member

7. 25.02.2014


This case be put before the Final Bench  for further proceedings.


Chairman

3.

25.10.2013


No one is present on behalf of the appellant. To come up for preliminary hearing on 04.12.2013.


Member

4.

04.12.2013


No one is present on behalf of the appellant. To come up for preliminary hearing on 24.01.2014.

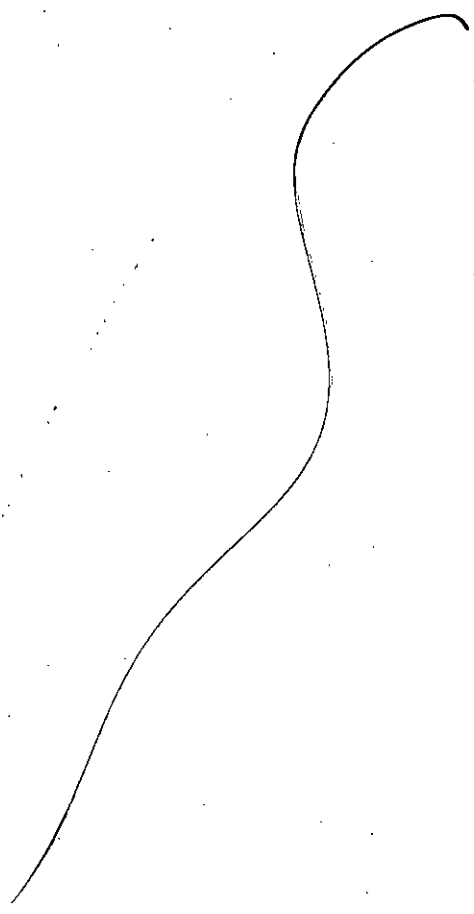

Member

5.

24.01.2014



No one is present on behalf of the appellant. Notice be issued to the appellant/counsel for the appellant for preliminary hearing on 25.02.2014.


Member



Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 1156/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	25 /07/2013	<p>The appeal of Mr. Saleem Pervez resubmitted today by Mr. Syed Shahid Sherazi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	31-7-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>25-10-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Saleem Pervez ASI received today i.e. on 10.07.2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Not removed

- 1- Addresses of respondent Nos. 3 to 21 are incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- 23 more copies/sets of the appeal alongwith annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1069 /S.T,

Dt. 10/07 /2013.

[Signature]
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Shahid Sherazi Advocate D.I.Khan

Note: All objections have been removed and resubmitted

on 25-07-2013

[Signature]

BEFORE THE SERVICE TRIBUNAL K.P.K, PESHAWAR.

Service Appeal No. 1156 /2013

Saleem Parvez.....Appellant

VERSUS

Provincial Police Officer & Others.....Respondents

INDEX

<u>S.NO</u>	<u>PARTICULARS</u>	<u>ANNEXURE</u>	<u>PAGE NO.</u>
1	Grounds of appeal alongwith affidavit is <i>Addresses</i>		<i>1-4</i>
2	Copy of order dated 06/04/09	"A"	<i>5</i>
3	Copy of impugned seniority list dated 11/02/2013.	"B"	<i>6-8</i>
4	Copy of Departmental appeal dated 11/03/2013	"C"	<i>9-10</i>
5	Address of parties		
6			
7			
8	Vakalatnama		<i>11</i>

Your Humble Appellant

Saleem Parvez

Saleem Parvez

Through counsel

Dated: **9/7/2013**

SYED SHAHID SHERAZI

Advocate,
Mastan Zaidi Hall,
District Bar, D.I.K
Cell # 0333-9962514

9/7/2013

BEFORE THE SERVICE TRIBUNAL K.P.K, PESHAWAR.

Service Appeal No. 1156 /2013

Saleem Parvez (ASI No.87/D) S/o Ghulam Qasim r/o Garhi Sadozai Dera Ismail Khan.

.....(Appellant)

VERSUS

- 1. I.G of Police Khyber Pakhtunkhwa, Peshawar.
- 2. D.I.G, Police Dera Ismail Khan Range.
- 3. D.I.G, Head Quarters K.P.K, Peshawar.
- 4. ~~Fazal Rahim 33-D (OSI), c/o D.P.O, D.I.Khan.~~
- 5. Mumtaz 104-D (OSI), c/o D.P.O, D.I.Khan.
- 6. Abdullah Khan 6-D (ASI), c/o D.P.O, D.I.Khan.
- 7. Allah Nawaz 7-D (ASI), c/o D.P.O, D.I.Khan.
- 8. Liaqat Ali 50-D (ASI), c/o D.P.O, D.I.Khan.
- 9. Parvez Hussain 69-D (ASI), c/o D.P.O, D.I.Khan.
- 10. Adam Khan 78-D (ASI), c/o D.P.O, D.I.Khan.
- 11. ~~Inam Ullah 98-D (ASI), c/o D.P.O, D.I.Khan.~~
- 12. Abdul Ghani 107-D (ASI), c/o D.P.O, D.I.Khan.
- 13. Ghulam Farid 109-D (ASI), c/o D.P.O, D.I.Khan.
- 14. Shah Nadir 110-D (ASI), c/o D.P.O, D.I.Khan.
- 15. Mohammad Yaqoob 11-D (ASI), c/o D.P.O, D.I.Khan.
- 16. Mohammad Ashraf 112-D (ASI), c/o D.P.O, D.I.Khan.
- 17. Ebad Wazir 89-D (ASI), c/o CCPO Peshawar.
- 18. Minhaj Sikindar Yar Khan 88-D (ASI), c/o D.P.O, D.I.Khan.
- 19. Kashif Sattar 92-D (ASI), c/o D.P.O, D.I.Khan.
- 20. Mohammad Adnan 91-D (ASI), c/o D.P.O, D.I.Khan.
- 21. Fazal Ur Rehman 94-D (ASI), c/o D.P.O, D.I.Khan.

113
10-7-13

Private respondents from 6 to 10
12/10/13
to
19/10/13
22-2-18

.....(Respondents)

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE ORDER OF RESPONDENT NO.2 ISSUED VIDE A ORDER NO. 556-62 / ES DATED 11/02/2013 IN WHICH THE RESPONDENT NO. 2 HAS SHOWN THE APPELLANT JUNIOR TO THE RESPONDENT NO. 4 TO 21 WHICH IS AGAINST THE LAW, RULES AND THAT OF RESPONDENT NO.1 WHO DID NOT RESPOND THE DEPARTMENTAL APPEAL OF APPELLANT.

10/7/13

Respectfully Sheweth:-

1. That the appellant was inducted in Police Department as probationer Assistant Sub-Inspector (BPS-9) on the recommendation of Khyber Pakhtunkhwa Public Service Commission vide order dated 06/04/2009. Copy of order dated 06/04/2009 is enclosed as **Annexure "A"**.

co-submitted to and filed.

25/7/13

- 2- That the appellant stood first on the merit list proposed by the K.P.K Public Service Commission which is also upheld by the Police Department.
- 3- That the impugned seniority list issued by Respondent No.2 vide notification No. 556-62/ES dated 11/02/2013, shows the appellant junior to the respondents No. 4 to 21, copy of impugned seniority list is enclosed as "Annexure B".
- 4- That the appellant being aggrieved, preferred Departmental appeal / representation U/S 22 of Civil Servant Act 1973 to respondent No. 2 against the impugned seniority list vide notification No. 556-62/ES dated 11/02/2013. Copy of Departmental Appeal dated 11/03/2013 is enclosed as "Annexure C".
- 5- That the respondents No. 1 & 2 being competent authority to entertain the Departmental appeal / representation for redressal of grievances of appellant did not responded to the same.
- 6- That the applicant now constrained to move this Honourable Tribunal for the redressal of grievances for the following amongst other grounds:

GROUND:-

- a) That the impugned seniority list have no legal footing, hence ineffective upon the rights of appellant.
- b) That the respondents No. 4 to 16 are juniors to the appellant as the date of confirmation of the appellant is earlier than that of the respondents No. 4 to 16 and also the respondents no. 17 to 21 are juniors to the appellant according to the merit of KPK Public Service Commission and also according to the age.
- c) That the respondent No. 1 to 2 have ignored the rules and facts just to accommodate their blue eyed which is patently illegal.
- d) That the impugned seniority list is also the violation of Police Rules and statutory provision as well as the dictum late down by the superior Court in their various judgments, hence the same is illegal, against the law, facts, equity and justice and no legal footing to stand upon.
- e) That the seniority list has been prepared on the basis of self made formula / criteria, thus the same is need to be set-aside and declared against the law / rules and natural justice.

f) That the impugned seniority list is classical example of colorful exercise of the powers by showing the junior officials as senior to the appellant which is sufficient to prove the malafide of the respondents.

g) That the impugned seniority list is by its self speaks volume the grievances the appellant as a topper of K.P.K Public Service Commission has been shown junior to the officials who have just passed the commission exam.

h) That it is just fair as well as in the interest of justice and in view of the above facts and circumstances, the impugned seniority list wherein the appellant has been deprived from his due right, may be declared as illegal, unlawful and without jurisdiction and the same is need to be set at naught.

It is, therefore, humbly requested that by accepting this service appeal, the seniority list vide notification No. 556-62/ES dated 11/02/2013 may please be set-aside and the appellant may please be declared as senior to the respondent No. 4 to 21 with all back benefits since the date of confirmation and any other relief as deemed fit may also be ordered in favour of appellant.

Your Humble Appellant


Salim Parvez

Through counsel

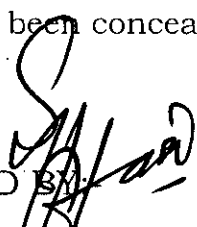
Dated: 09/07/2013

Affian 9 July 2013

SYED SHAHID SHERAZI
Advocate High Court
Dera Ismail Khan.

AFFIDAVIT:

I **Saleem Parvez** S/o Ghulam Qasim (ASI Police) r/o Garhi Sadozai Tehsil and District D.I.Khan, do hereby solemnly affirm declared on oath that contents of the above **Service appeal** are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



IDENTIFIED BY
SYED SHAHID SHERAZI
Advocate High Court
Dera Ismail Khan.


Deponent

BEFORE THE SERVICE TRIBUNAL K.P.K, PESHAWAR.

Service Appeal No. _____/2013

Saleem Pervez.....Appellant

VERSUS

Provincial Police Officer & Others.....Respondents

ADDRESS OF PARTIES


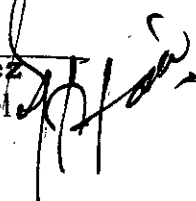
APPELLANT:

Saleem Pervez s/o Ghulam Qasim r/o Garhi Sadozai Dera Ismail Khan.

RESPONDENTS:

1. I.G of Police Khyber Pakhtunkhwa, Peshawar.
2. D.I.G, Police Dera Ismail Khan Range.
3. D.I.G, Head Quarters K.P.K, Peshawar.
4. Fazal Rahim 33-D (Sub-Inspector), c/o D.P.O Office, near District Courts, D.I.Khan.
5. Mumtaz 104-D (Sub-Inspector), c/o D.P.O Office, near District Courts, D.I.Khan.
6. Abdullah Khan 6-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
7. Allah Nawaz 7-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
8. Liaqat Ali 50-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
9. Pervez Hussain 69-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
10. Adam Khan 78-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
11. Inam Ullah 98-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
12. Abdul Ghani 107-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
13. Ghulam Farid 109-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
14. Shah Nadir 110-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
15. Mohammad Yaqoob 11-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
16. Mohammad Ashraf 112-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
17. Ebad Wazir 89-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
18. Minhaj Sikindar Yar Khan 88-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
19. Kashif Sattar 92-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
20. Mohammad Adnan 91-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.
21. Fazal Ur Rehman 94-D (ASI), c/o D.P.O Office, near District Courts, D.I.Khan.

Your Humble Appellant


~~Saleem Pervez~~
 Through counsel 

Dated: / /2013

SYED SHAHID SHERAZI
 Advocate High Court
 Dera Ismail Khan.

(5)

ANX - A

30/4/09
07-04-09

Consequent on the recommendation of NWFP Public Service Commission and approved by PPO NWFP Peshawar vide letter No.3867-73/E-II dated 12.2.2009 and No.5687-91/E-II dated 28.2.2009 against the 25% quota reserved for direct appointment. The following candidates have been approved for appointment as Probation ASIs in Police Department on three years probation in BPS-00 (3820-230-10720) alongwith usual admissible allowances from the date of their arrival in the District subject to the medical fitness and character verification.

They are allotted Range Number and posted to the Districts as noted against their name: -

S#	Name with address	Range Number Allotted	District to which Posted
1	Salim Pervez s/o Ghulam Qasim r/o Street No.1 new Abbadi near Tarin Colony Mohallah Ghari Saduzai Tank road D.I.Khan	87/D	D.I.Khan
2	Minhaj Sikandar Yar Khan s/o Sikandar Yar Khan r/o Yar House, Yar Street Bannu road D.I.Khan	88/D	D.I.Khan
3	Ebaad Wazir s/o Abdul Wahid r/o House No.28 Street I Sector I, Phase-III Hayatabad Peshawar	89/D	D.I.Khan
4	Inamullah s/o Attaullah r/o Atta House near Faqimi gate Circular road D.I.Khan	90/D	Tank

(DR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,
Dera Ismail Khan

No. 1164-65 /ES Dated D.I.Khan. the 6 /04/2009

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

1. District Police Officer, Tank.
2. District Police Officer, D.I.Khan.

Necessary gazette notification may be issued accordingly.

Their application forms received from CPO NWFP Peshawar are sent herewith.

Enc. Appl. Forms.

386
12/4/09

o/B/EE/PO

For notification

(DR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,
Dera Ismail Khan

DPD/DIA
A. R. Khan

Handwritten signature and initials.

Syed Shahid Sherazi
Advocate High Court
Services Law Associates
D.I.Khan

5

ANX-A/1

ORDER

Consequent on approval by the honorable Chief Minister NWFP for appointment/ absorption in Police 'Shuhada's Sons/ Brothers of NWFP Police as ASI in BPS-09 (3820-230-10720) alongwith usual admissible allowances received through PPO NWFP Peshawar vide letter No.5908-13/E-II dated 2.3.2009 against 5% quota reserved for Shuhada's Sons/ Brothers in Police Department. The following Constables/ Candidates have been approved for appointment/ absorption as P.ASIs in Police Department on three years probation from the date of their arrival in the district subject to the medical fitness and character verification.

They are allotted Range Number and posted to the Districts as noted against their name: -

S#	Name with address	Range Number Allotted	District to which Posted
1	Constable Muhammad Adnan No.922 of D.I.Khan District Brother of Shaheed Constable Muhammad Imran r/o Village Lodhra Tehsil Paharpur District D.I.Khan	91/D	D.I.Khan
2	Constable Kashif Saltar No.1538 Brother of Shaheed Constable Shahid Saleem No.1278 r/o Street Doctor Sarwar Wali House No.4452/MC Mohallah Qasaban District D.I.Khan	92/D	D.I.Khan
3	Constable Sharifullah No.272 Brother of Shaheed Constable Abdul Latif No.428 r/o village Amma Khel Tehsil & District Tank	93/D	Tank
4	Fazal-ur-Rehman S/o Shaheed Constable Ghulam Yasin r/o Diyal Road D.I.Khan	94/D	D.I.Khan
5	Naqeebullah s/o Shaheed ASI Banat Gul r/o village Sheikh Mula Khel PO Gilloti District D.I.Khan	95/D	Tank

(DR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,
Dera Ismail Khan

No. 1162-63 /ES Dated D.I.Khan the 6 /04/2009

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

1. District Police Officer, Tank.
2. District Police Officer, D.I.Khan.

Necessary gazette notification may be issued accordingly

Their application forms received from CPO NWFP Peshawar are sent herewith.

And. Apph Forms
OB/EC/PO
For information

(DR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,
Dera Ismail Khan

Attested
Syed Shahid Sherazi
Advocate High Court
Services Law Associates
D.I.Khan

/DOR

Dated D.I.Khan the

28/6

2009

9

Ann. "C"

To,

The Deputy inspector General of Police
D.I.Khan region.

Subject: DEPARTMENTAL APPEAL/REPRESENTATION

Respectfully sheweth.

1. That the applicant was appointed as A.S.I Police on the recommendation of the Public Service Commission vide order dated 06-04-2009.(Copy of order is attached).
2. That the applicant stood first on the merit list proposed by the Public Service Commission which is also upheld by the Police Department.
3. That the Sonority List issued by your kind office Vide notification No.556-62/ES, dated 11-02-2013 is against the law and rules recommended by the statute.(Copy of impugned Seniority List is attached).
4. That the impugned Seniority List is against the law and facts therefore ineffective upon the right of applicant because the order No. 1164-65/ES dated 6.4-2009 the applicant stood first on the same but in the impugned Seniority List, the applicant has been shown Joiner to the other officials/badge mates mentioned in the order dated 6-04-2009.
5. That the impugned Seniority List is not prepared according to law because the impugned Seniority List is against the facts i.e. dated of first appointment, age and education.
6. That the applicant will suffer irreparable loss, if the impugned Seniority List remains in the failed.

allisted

Syed
Syed Shahid Sherazi
Advocate High Court
Services Law Associates
D.I.Khan

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ANX - "B"

POLICE DEPARTMENT

D.I.KHAN REGION

SENIORITY LIST OF OFFG: SUB INSPECTORS AND CONFIRMED ASSISTANT SUB INSPECTORS ON LIST 'E' AS IT STOOD ON 31.12.2012

NOTIFICATOIN NO. 555 /ES, Seniority List: - The Seniority List of Offg: Sub Inspectors/ Confirmed Assistant Sub Inspectors on List 'E' of D.I.Khan Region Police as it stood on 31.12.2012 is hereby published for information to all concerned

S#	Names & Number	Date of Birth	Date of Enlistment	Date of entry to list "E"	Promotion as Offg: SI	Education	Remarks
1	OSI Sanullah No. 1 / D	05.04.1955	14.07.1973	30.11.2004	08.03.2007	Matric	—
2	OSI Ghazanfar Ali No. 44 / D	10.06.1955	27.08.1974	30.11.2004	08.03.2007	Matric	—
3	OSI Faridullah No. 37 / D	01.06.1954	01.12.1972	30.11.2004	08.03.2007	Matric	—
4	OSI Imam Muhammad No. 41 / D	11.10.1954	21.03.1971	30.11.2004	08.03.2007	7th	—
5	OSI Muhammad Iqbal No. 47 / D	25.06.1955	01.09.1975	30.11.2004	26.04.2007	9th	—
6	OSI Muhammad Ashraf, No.54/D	05.02.1955	23.12.1978	01.01.2007	16.05.2007	F.A	—
7	OSI Ghulam Bashir, No.55/D	01.01.1957	12.04.1976	01.01.2007	11.05.2007	Matric	—
8	OSI Haroon-ul-Rashid, No.11/D	01.04.1957	20.03.1975	08.03.2007	08.03.2007	Matric	—
9	OSI Allah Wasaya, No.56/D	11.01.1957	22.09.1975	01.01.2007	11.09.2007	Matric	—
10	OSI Ghulam Khan, No.57/D	16.05.1955	17.10.1975	01.01.2007	27.10.2007	Matric	—
11	OSI Mazhar Hussain Shah, 58/D	01.06.1956	18.03.1979	01.01.2007	03.11.2007	Matric	—
12	OSI Muhammad Nawaz, 59/D	07.02.1955	21.02.1976	01.01.2007	26.10.2007	Matric	—
13	OSI Muhammad Riaz, 61/D	01.04.1955	09.07.1976	01.01.2007	27.10.2007	Matric	—
14	OSI Inayatullah, 62/D	10.10.1954	14.10.1975	01.01.2007	27.10.2007	Matric	—
15	OSI Muhammad Hanif, 63/D	12.02.1957	30.10.1975	01.01.2007	27.10.2007	Matric	—
16	OSI Allah Nawaz, 64/D	08.06.1958	02.09.1976	01.01.2007	27.10.2007	M.A/ LLB	—
17	OSI Amir Muhammad Faqir, 67/D	22.08.1956	10.04.1976	01.01.2007	27.10.2007	Matric	—
18	OSI Shah Nawaz, 45/D	15.05.1958	03.06.1976	01.06.2007	09.11.2007	Matric	—
19	OSI Abdullah Khan, 68/D	12.03.1958	03.06.1976	01.06.2007	06.11.2007	Matric	—
20	OSI Fazil Khan, 8/D	05.07.1957	08.04.1976	24.10.2007	08.11.2007	Matric	—
21	OSI Abdul Qayyum, 71/D	09.05.1955	01.09.1975	24.10.2007	09.03.2008	9th	—
22	OSI Mira Jan, 72/D	24.07.1954	27.07.1973	24.10.2007	29.02.2008	Matric	—
23	OSI Shah Nawaz, 73/D	22.06.1956	15.09.1975	24.10.2007	17.04.2008	Matric	—
24	OSI Faizullah, 74/D	10.02.1956	20.08.1976	24.10.2007	15.05.2008	Matric	—
25	OSI Abdul Majeed, 75/D	03.06.1956	18.11.1976	24.10.2007	08.05.2008	Matric	—
26	OSI Muhammad Hashim, 79/D	12.06.1959	13.02.1980	19.05.2008	05.08.2008	Under Matric	—
27	OSI Rustam Khan, 80/D	13.04.1958	20.12.1976	19.05.2008	13.12.2008	Under Matric	—
28	OSI Shama Jan, 81/D	03.12.1959	28.09.1978	19.05.2008	16.12.2008	Matric	—
29	OSI Sabir Shah, 14/D	06.10.1958	27.09.1978	25.07.2008	04.12.2008	F.A	—
30	OSI Abdul Hamid, 15/D	10.05.1956	24.11.1976	25.07.2008	14.12.2008	Matric	—
31	OSI Amir Abdullah, 20/D	07.02.1958	23.11.1981	25.07.2008	04.02.2008	Matric	—
32	OSI Allah Bakhsh, 82/D	01.03.1955	28.02.1980	25.07.2008	01.03.2009	Matric	—
33	OSI Bashir Hussain, 83/D	05.03.1960	16.01.1979	25.07.2008	21.02.2009	F.A	—

Attached to be issued

Sherazi
Associate High Court
Services Law Associates
D.I.Khan

By: Inspector General of Police
D.I.Khan Range D.I.Khan

7

34	OSI Muza Mir, 9/D	01.01.1957	08.09.1979	01.01.2009	21.06.2009	Matric	
35	OSI Shah Jehan, 12/D	25.06.1955	31.10.1975	01.01.2009	25.06.2009	9th	
36	OSI Matta Hussain, 16/D	08.04.1954	02.04.1979	01.01.2009	25.06.2009	Matric	
37	OSI Faiz Kaleem, 19/D	06.09.1960	01.04.1980	01.01.2009	08.08.2009	Matric	
38	OSI Ghulam Yasin, 24/D	04.02.1960	28.01.1985	01.01.2009	06.08.2009	Matric	
39	OSI Muhammad Nawaz, 34/D	05.01.1961	30.01.1979	01.01.2009	07.08.2009	9th	
40	OSI Ghulam Kazim, 35/D	15.04.1960	18.01.1979	01.01.2009	12.08.2009	9th	
41	OSI Abdul Latif, 84/D	16.10.1960	06.03.1979	01.01.2009	07.08.2009	Matric	
42	OSI Inayatullah, 85/D	10.03.1960	05.03.1980	01.01.2009	06.08.2009	Matric	
43	OSI Khalid Mehmood, 86/D	15.06.1971	29.12.1991	01.01.2009	17.08.2009	F.A	
44	OSI Mir Ajab, 23/D	11.10.1956	23.12.1978	31.07.2009	08.09.2009	Matric	
45	OSI Alla-ud-Din, 29/D	06.05.1960	01.06.1978	31.07.2009	08.09.2009	F.A	
46	OSI Sajawal Khan, 60/D	01.01.1960	27.08.1978	31.07.2009	08.09.2009	Matric	
47	OSI Fazal Hussain Shah, 66/D	01.01.1958	09.04.1976	31.07.2009	09.09.2009	Matric	
48	OSI Saadullah Khan, 96/D	01.08.1958	07.12.1979	31.07.2009	10.09.2009	Matric	
49	OSI Mir Aslam, 100/D	01.01.1958	06.07.1976	31.07.2009	11.12.2009	Matric	
50	OSI Allah Dad, 97/D	21.01.1959	07.11.1978	31.07.2009	12.12.2009	Matric	
51	OSI Muhammad Nawaz, 99/D	01.05.1960	27.05.1978	31.07.2009	14.12.2009	Matric	
52	OSI Muhammad Iqbal, 18/D	19.04.1978	10.10.2006	01.02.2010	23.06.2011	BA/LLB	
53	OSI Tariq Saleem, 22/D	31.03.1980	10.10.2006	01.02.2010	23.06.2011	MSc	
54	OSI Sadiqullah, 53/D	01.08.1969	29.12.2006	01.02.2010	23.06.2011	M.A	
55	OSI Syed Asghar Ali Shah, 51/D	03.01.1974	29.12.2006	01.02.2010	14.12.2012	M.A	
56	OSI Saif-ur-Rehman, 31/D	16.10.1975	29.12.2006	01.02.2010	14.12.2012	M.A	
57	OSI Muhammad Alamgir, 49/D	06.10.1980	29.12.2006	01.02.2010	14.12.2012	M.A	
58	OSI Muhammad Imran, 52/D	02.02.1982	29.12.2006	01.02.2010	14.12.2012	B.A	
59	OSI Fazal Rahim, 33/D	10.03.1963	02.03.1982	15.03.2010	14.12.2012	Matric	
60	OSI Mumtaz Khan, 104/D	01.06.1965	26.12.1987	20.07.2010	14.12.2012	B.A	
61	OSI Syed Sagheer Abbas Shah, 42/D	09.04.1984	05.10.2007	06.10.2010	14.12.2012	F.A	
62	ASI Abdullah Khan, 6/D	20.07.1961	05.04.1981	15.06.2011	-	Matric	
63	ASI Allah Nawaz, 7/D	18.08.1956	07.03.1975	15.06.2011	-	F.A	
64	ASI Liaqat Ali, 50/D	10.01.1959	21.11.1978	15.06.2011	-	F.A	
65	ASI Pervez Hussain, 69/D	15.04.1973	11.10.1993	15.06.2011	-	F.A	
66	ASI Adam Khan, 78/D	09.11.1958	18.11.1976	15.06.2011	-	Matric	
67	ASI Inamullah, 98/D	09.01.1967	01.07.1989	15.06.2011	-	Matric	
68	ASI Abdul Ghani, 107/D	01.03.1957	21.10.1975	15.06.2011	-	Matric	
69	ASI Ghulam Farid, 109/D	10.06.1960	25.09.1980	15.06.2011	-	Matric	
70	ASI Shah Nadir, 110/D	10.09.1957	14.10.1975	15.06.2011	-	Matric	
71	ASI Muhammad Yaqoob, 111/D	01.12.1956	20.10.1975	15.06.2011	-	9th	
72	ASI Muhammad Ashraf, 112/D	05.04.1960	18.04.1978	15.06.2011	-	9th	
73	ASI Ebad Wazir, 89/D	27.01.1982	24.02.2009	25.02.2012	-	MA/LLB	On deputation to CCP Peshawar
74	ASI Minhaj Sikandar Yar Khan, 88/D	19.08.1981	07.03.2009	27.03.2012	-	MBA	
75	ASI Kashif Sattar, 92/D	06.04.1985	14.03.2009	27.03.2012	-	F.Sc	

[Signature]
 Dy. Inspector General of Police
 D.I.Khan Range D.I.Khan

[Signature]
 Services & Associates
 D.I.Khan

8

76	ASI Muhammad Adnan, 91/D	14.04.1989	14.03.2009	27.03.2012	-	F.Sc	
77	ASI Fazal-ur-Rehman, 94/D	02.03.1987	19.03.2009	27.03.2012	-	F.A	
78	ASI Saleem Parvez, 87/D	01.03.1978	26.03.2009	27.03.2012	-	B.Sc	
79	ASI Sharifullah, 93/D	05.02.1981	10.04.2009	11.04.2012	-	F.A	
80	ASI Abdul Ghani, 10/D	11.01.1957	28.10.1976	23.04.2012	-	Matric	
81	ASI Jan Muhammad, 21/D	07.03.1962	19.02.1981	23.04.2012	-	9th	
82	ASI Ghulam Ali, 39/D	12.11.1957	21.06.1976	23.04.2012	-	Matric	
83	ASI Said Marjan, 40/D	20.11.1965	26.11.1984	23.04.2012	-	Matric	

No. 556-62/ES dated D.I.Khan the 11-02-2013

(MOHAMMAD ALI BABA KHEL) PSP
Deputy Inspector General of Police,
Dera Ismail Khan Region

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

- 1 The Additional Inspector General of Police, Investigation, Khyber Pakhtunkhwa, Peshawar.
Two spare copies of the notification are enclosed for publication.
- 2 The Addl. Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawar
- 3 The Capital City Police Officer, Peshawar
- 4-5 The District Police Officers, D.I.Khan & Tank.
- 6-7 The Superintendent of Police, Investigation, D.I.Khan & Tank

They are requested to please inform all the Police Officers serving under their command.
Any officer who have objection on his seniority he should submit his representation within
one month after the issue of the list

(MOHAMMAD ALI BABA KHEL) PSP
Deputy Inspector General of Police,
Dera Ismail Khan Region

Syed Shahid Sheraz
Advocate High Court
Services Law Associates
D.I.Khan

3/1/13

11

VAKALATNAMA

(Power of attorney)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Suit/Case Title Salim Pervez vs 198 & others

I/WE the undersigned

the above named, hereby appoint, SYED SHAHID SHERAZI ADVOCATE, D. I. KHAN, in the above mentioned matter / case and authorize him to do all or any of the following acts, in my/our name and on my/our behalf, that is to say,

1. To appear, act and plead for me/us in the above mentioned case in this Court/ tribunal in which the same may be tried or heard or any other proceedings what so ever, ancillary thereto, including appeal, revision etc; on payment of fees separately for each court by me / us,
2. To sign, verify, file, present or withdraw all/any proceedings, petitions, appeals, cross objections and application for compromise or withdrawal, or for submission to arbitration of the said case or any other documents, as may be deemed necessary or advisable by him and to conduct prosecution or defense of the said case at all its stages,
3. to undertake execution proceedings, deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be conferred to be done for the progress and in the course of prosecution of the said case,
4. To appoint and instruct any other Advocate/ legal practitioner authorizing him to exercise the power and authority conferred upon the advocate whenever he may think fit to do so and to sign Power of Attorney on our behalf,

I /we, the undersigned do hereby agree to ratify and confirm all acts done by the advocate or his authorized substitute in the matter as my /our own acts, as if done by me/us to intents and purposes, and I / we undertake that I /we or my/our duly authorized agent shall appear in the court on all hearings and will inform the advocate(s) for appearance when case is called and I/we the undersigned agree hereby not to hold the advocate or his substitute responsible if the said case be proceeded ex-parte or dismissed in default in consequence of my/our absence from court when it is called for hearing and for the result of the said case, the adjournment costs whenever ordered by the court shall be of the advocate which he may receive and retain himself. I/we the undersigned do hereby agree that in the event of the whole or part of the fees agreed by me/us to be paid to the advocate, if remain unpaid, he shall be entitled to withdraw from prosecution of the above said case until the same is paid and fee settled is only for the above said case and above court and I /we agree hereby that once fee is paid, I/we shall not be entitled for refund of the same in any case whatsoever.

IN WITNESS WHEREOF, I /we do hereby set my/our hand to these presents, the contents of which have been read / read over, explained fully and understood by me/us on

This 09 Day of July 2013.

Salim Pervez
Signature(s) of Client

Accepted by:
Syed Shahid Sherazi
SYED SHAHID SHERAZI
Advocate, D.I. Khan

Salim Pervez
ASI Police

CONFIDENTIAL

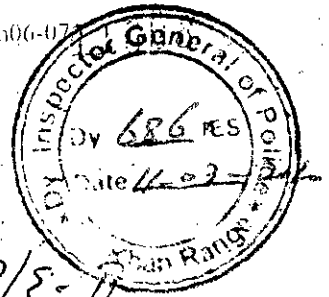
173

NWFP PUBLIC SERVICE COMMISSION
2 Fort Road Peshawar Cantt
Ph No: 091-9213563 (1082), 9214131
www.nwfppsc.gov.pk



NWFP-PSC-EXAM-ASI-Fresh06-07

Dated: 25-12-2009



2678/E-11

1/3/Photo

3-12/2009

From

Director Examination
NWFP Public Service Commission
Peshawar

To

The Provincial Police Officer
NWFP Peshawar.

Subject:

**RECRUITMENT TO THE POST OF ASSISTANT SUB INSPECTOR (BPS-09)
IN POLICE DEPARTMENT ADVT. NO. 01/2007**

In continuation to this office letter No.12755 dated 06-03-2009 on the subject noted above and to state that the inter-se-merit position of the recommended candidates for the posts of ASI (BPS-09) in Police Deptt. is sent herewith for record at your office, as per detail given below.

Merit Order	Roll No	Name With Father Name	District/ Zone
✓ 1.	663	Saleem Parvez S/O Ghulam Qasim	D.I Khan/4
2.	2304	Ijaz Anwar S/O Aurangzeb	Buner/3
3.	1220	Hafeez-ur-Rehman S/O Kamdar Khan	Nowshera/2
4.	2143	Gouhar Ali S/O Hazrat Gul	Swabi/2
5.	2712	Muhammad Nawab Khan S/O Armanash Khan	Swat/3
6.	2704	Miraj Muhammad S/O Badshah Muhammad	Dit Upper/3
7.	2611	Amjad Iqbal S/O Abdul Latif Khan	Shangra/3
8.	2939	Rizwan Ullah S/O Shah Niaz Khan	Bannu/4
9.	2298	Farrukh Sair S/O Mumber Khan	Buner/5
10.	2767	Aman Ullah Khan S/O Muhammad Sher Khan	Bannu/4
✓ 11.	557	Minhaj Sikandar Yar Khan S/O Sikandar Yar Khan	D.I Khan/4
12.	1981	Syed Khalid Shah S/O Syed Yaqoub Shah	Peshawar/2
13.	2622	Khalid Khan S/O Ifkhar Hussain	Bajaur Agy/2
14.	719	Inam Ullah S/O Atta Ullah	Tank/4
15.	1551	Iman S/O Sher Afzal	Peshawar/2
16.	1777	Naeem Haider Khan S/O Ghulam Haider Khan	Peshawar/2
17.	1682	Sajjad Ahmad Khan S/O Amin Ullah Jan	Peshawar/2
18.	957	Farooq S/O Sher Ghani	Mardan/2
19.	1021	Mohsin Fawad S/O Syed Abdul Rehman	Mardan/2
20.	1200	Akhtar Naseer S/O Naseer-ud-Din	Nowshera/2
21.	1154	Shahid Khan S/O Sadat Khan	Mardan/2

Sgt 10

RA

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29

23.	2988	Umar Irfan S/O Irfan Ullah	Bannu/4
24.	2473	Mukaram Shah S/O Ahmad Shah	Dir Lower/3
25.	2919	Nasir Ullah Khan S/O Muhammad Iqbal	Bannu/4
26.	1528	Imran Alam Khan-Khalil S/O Mawaz Alam Khan Khalil	Peshawar/2
27.	2522	Abdul Ghafoor S/O Muhammad Sabir Khan	Kohistan/3
28.	909	Zeeshan Ahmed S/O Kifayat Ullah Khan	Hangu/4
29.	920	Ajab Khan S/O Abdul Shakoor	Mardan/2
30.	1226	Inam Ullah S/O Jamshed Khan	Nowshera/2
31.	1461	Faisal Rehman S/O Gula Jan	Peshawar/2
32.	1584	Khalid Anwar S/O Abdul Malik Khan	Peshawar/2
33.	2902	Muhammad Raza Khan S/O Taj Ali Khan	F.R Lakkki/1
34.	1356	Ahmad Rashid S/O Abdul Rasheed Arif	Peshawar/2
35.	2524	Abdul Sattar Khan S/O Sharif Khan	Kohistan/3
36.	2562	Fazal Malik S/O Fazal Hamid	Malakand Agy/3
37.	524	Ihsan Ullah S/O Rehman Ullah	N.W Agy/1
38.	2346	Khalil-ur-Rehman Sherazi S/O Muhammad Sherazi	Chitral/3
39.	3017	Ebad Wazir S/O Abdul Wahid	S.W Agy/1
40.	2128	Bahar Ali S/O Ayub Khan	Swabi/2
41.	1631	Muhammad Abid Afridi S/O Malik Muhammad Akbar Afridi	Khyber Agy/1
42.	2424	Imad-ud-Din S/O Jamal-ud-Din	Dir Lower/3
43.	743	Fazal Muhammad S/O Ahmad Khan	Hangu/4
44.	2707	Muhammad Ali S/O Haji Faramoz Khan	Swat/3
45.	2514	Wajid Shah S/O Rashid Khan	Dir Upper/3
46.	470	Allah Nawaz Khan S/O Sher Ali Khan	N.W Agy/1
47.	3054	Imran Ullah Khan S/O Muhammad Aslam Khan	Lakki/4
48.	2402	Bakht Zaman Khan S/O Khaista Bacha	Dir Upper/3
49.	2333	Basharat Ahmad S/O Zulfiqar Sher	Chitral/3
50.	2654	Akhtar Ali S/O Khurshid Ali	Swat/3
51.	2150	Humayoon Khan S/O Said-uz-Zaman	Swabi/2
52.	2700	Kaleem Ullah S/O Liaqat Ali Khan	Swat/3
53.	2203	Murtaza Ali S/O Mohammad Ayub Sani	Swabi/2
54.	69	Muhammad Arshad S/O Muhammad Zahir	Battagram/3
55.	1943	Shakir Ullah S/O Sharaf Hassan	Khyber Agy/1
56.	2452	Muhammad Arshad Khan S/O Din Muhammad	Dir Lower/3
57.	2093	Abdul Baseer S/O Abdul Maroof	Swabi/2
58.	2624	Muhammad Abbas S/O Luqman	Shangla/3
59.	635	Noor Rehman S/O Abdur Rehman	S.W Agy/1
60.	163	Zulfiqar Ali S/O Zardad	Abbottabad/3
61.	225	Muhammad Uzair S/O Muhammad Akram	Haripur/3
62.	46	Inam-ul-Haq S/O Muhammad Ashraf	Abbottabad/3

186	Bashir Ahmad S/O Sikan		
2073	Aziz-ur-Rehman S/O Ihsan		
64.	221	Muhammad Sajid Farooq S/O G	
65.	1424	Awal Sher Khan S/O Nadir Sher	
66.	145	Tufail Muhammad S/O Muhammad Ghani	
67.	206	Muhammad Asad Yousaf S/O Muhammad Yousaf	
68.	53	Junaid Irshad S/O Irshad Hussain	
69.	350	Muhammad Muneer Khan S/O Ghulam Muhammad	Manshra/5
70.	815	Zahid Ullah S/O Ruken Din	F.R Kohat/1
71.	844	Imran Khan S/O Hakim Khan	Kohat/4
72.	333	Mudassar Zia S/O Ghulam Sarwar	Manshra/5
73.	339	Muhammad Arif Khan S/O Muhammad Banaras Khan	Manshra/5
74.	391	Sadaqat Nisar S/O Nisar Muhammad Khan	Manshra/5
75.	763	Abbas Ali S/O Liaqat Ali	Kurram Agy/1
76.	798	Mujahid Hussain S/O Nasar Ali	Kurram Agy/1

(AMIR HAJAM SHAH)
DIRECTOR EXAMINATION

OFFICE OF THE PROVINCIAL POLICE OFFICER NWFP, PESHAWAR.

No. 7012-18 /E-II dated Peshawar, the 04/3/2010.

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

1. Capital City Police Officer Peshawar.
2. D.I.G Malakand, Kohat, D.I. Khan, Bannu, Mardan and Hazara, Regions.

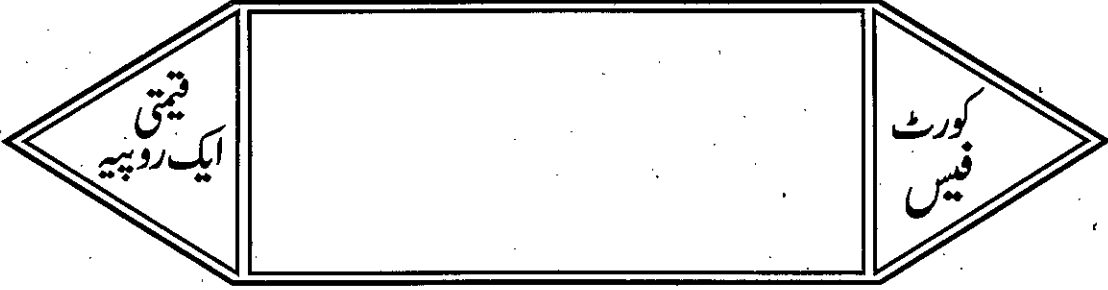
no. 885-86/ES dt. 12-03-2010

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Tanki of information and n-action

[Signature]
REGISTRAR,
FOR PROVINCIAL POLICE OFFICER,
N.W.F.P, PESHAWAR.

[Signature]
Dy. Inspector General of Police
D.I. Khan Range.

وکالت نامہ



Service Tribunal, Khyber Pakhtunkhwa عدالت

Saleem Parwez منجانب Peshawar

IIP & Oress نام

Service Appeal دعویٰ یا جرم

Seniority & Promotion تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہ دی برائے پیشی یا تفسیہ مقدمہ نام TRIBUNAL COURT

Akhtar Saleem Khan Baloch Advocate High Court

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہونا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساختہ پر داخست صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسانے ڈگری نظر ثانی اپیل نگرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ثالثی یا راضی نامہ و فیصلہ برطرف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکور بیرون از کچہری صدر بیرونی مقدمہ مذکور نظر ثانی اپیل و نگرانی و برآمدگی مقدمہ یا منسوفی ڈگری یک طرفہ یا درخواست حکم استعاف یا قرتی یا گرفتاری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا جی علیحدہ مختصم بیرونی کا اختیار ہو گا اور تمام ساختہ پر داخست صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل نگرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور دیے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

25th February 2014 مورخہ

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted &
Akhtar Saleem Khan Baloch
Advocate High Court
Dera Ismail Khan

Saleem Parwez

BEFORE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No: 1156 of 2013

Saleem Pervez (Appellant)

VERSUS

IGP, and others (Respondents)

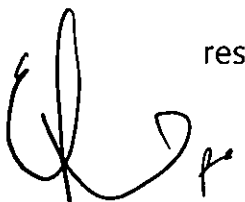
COMMENTS ON BEHALF OF RESPONDENT NO. 4

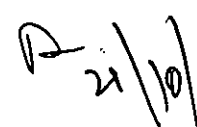
PRILIMINARY OBJECTIONS:-

1. Appellant has no cause of action and locus standi to file present appeal.
2. Appeal is barred by time.
3. Appeal is bad for want of necessary parties.
4. Seniority list is clear and correctly prepared in the light of Police Rules.
5. Appellant is estopped to file present appeal due to his conduct.
6. Appeal has malafidely been filed just to harras and humaliate the answering respondent and others.

ON FACTS:-

1. Pare No: 1 pertains to record, needs no reply.
2. It is not correct and is mere self assesment.
3. Seniority list is absolutly correct. It bears correct and true entries of the service record. It is prepared in the light of Police Rules. Answering respondent No: 4 is senior to appellant. Answering respondent is at serial No: 59 whereas; appellant is at serial No: 78 of the list. Answering respondent was inducted in the force on 02.03.1980 as constable. He



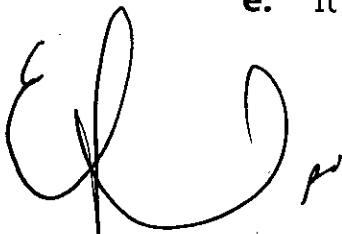


passed his Lower Class Course in the year 1988-89, Intermediate Course in the year 1998 and Upper Class Course in the year 2010-2011. Answering respondent was enlisted in "List-E" in March, 2010. Appellant's name was entered in List-E on 27.03.2012. It is clear that he is junior to the answering respondent.

4. It is incorrect. Appellant has no locus standi to file any departmental appeal.
5. Does not pertain to answering respondent, hence denied.
6. Appellant has no locus standi and cause of action to file present appeal. Appeal is bad for non joinder of necessary parties.

ON GROUNDS:

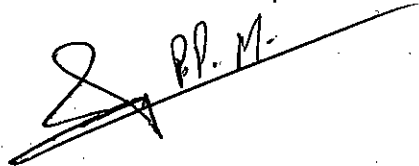
- a. Incorrect. Seniority list has been correctly prepared and is true.
- b. It is false in Toto. Appellant's seniority position is clear from the list. He is much junior to the answering respondent. Seniority is always considered from the date of confirmation in service and not from the date of appointment. Hence the stance of appellant is incorrect, false, wrong and phony.
- c. It is incorrect. Seniority List is correctly prepared strictly in accordance with law and Police Rules.
- d. It is wrong, detail answer is given above.
- e. It is false and incorrect. Seniority list is correct and true.



- f. It is mere an imigation and speculation of appellant. As mentioned above, seniority list is clear, correct and true. The same is prepared in the four corners of Police Rules.
- g. It is mere self assesment of the appelant, which in no manner advances appallant's false case.
- h. It is incorrect.

It is requested that this Hon'ble Tribunal may graciously be pleased to dismiss the appeal in hands with costs.

Your Humble Respondent No: 4



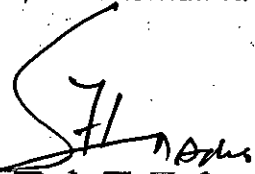
Fazal Raheem Khan

Through Counsel



Ehsan Ul Haq Malik

Advocate, Dera Ismail Khan



Syeda TalaT Zahra

Advocate, Dera Ismail Khan

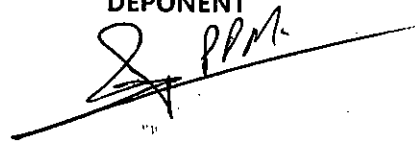
October 18, 2014

AFFIDAVIT

I, do hereby solēmly affirm and declare on oath that the contents of accompanying comments are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court



DEPONENT



وکالت نامہ

کورٹ فیس	قیٹی ایک روپیہ
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بعدالت خباب سرویس ٹریڈنگ پشاور

مخاطب: ریسٹورنٹ 4

بنام: 149 وغیرہ

دعویٰ یا جرم: سلیم پیر ویر

دعویٰ یا جرم: سرویس ایپریل 2013ء تا 2014ء 1156

تفصیل دعویٰ یا جرم:

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی اور جواب دہی برائے پیشی یا تصفیہ مقدمہ بنام احسان الحق صاحب سیدہ طلحہ زہرا ہسٹریا جہتاً ایڈووکیٹس ڈیرہ کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بڑا بڈریو رو برو عکالت حاضر ہوتا رہوں گا اور ہر وقت نکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا عمت نہ داہن کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل سماعت پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذکری نظر ثانی اپیل نگرانی و ہرقسم درخواست ہرقسم کے بیان دینے اور پر مابھی یا راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکور بیرون از پکھری صدر بیرونی مقدمہ مذکور نظر ثانی اپیل و نگرانی و برآمدگی مقدمہ یا مشنوی ذکری یک طرفہ یا درخواست حکم امتناعی یا ترقی یا گرفتاری نکل از فیصلہ اجراء ذکری بھی صاحب موصوف کو بشرط ادا یعنی علیحدہ مختص بیرونی کا اختیار ہو گا اور تمام ساختہ پرداختہ صاحب موصوف مثل کردہ از خود نکل از قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل نگرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا پیر بنر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواہ پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت میں یہ کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

18 مارچ 2014

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted

فضل رحمن خان

PPM

71

714812

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

Service Appeal No. 1156/2014

Saleem Pervez (ASI No. 87/D)
s/o Ghulam Qasim r/o Garhi Sadozai Dera Ismail Khan.....(Appellant)

Versus

1. The Provincial Police Officer (IGP), Khyber Pakhtunkhwa Peshawar.
2. The Regional Police Officer (DIG), Dera Ismail Khan
3. The Dy: Inspector General of Police, HQrs, KPK Peshawar.
.....(Respondents-1to3)

WRITTEN REPLY ON BEHALF OF RESPONDENTS NO.1, 2&3

Respectfully Sheweth,

PRELIMINARY OBJECTIONS

- 12.03.15
1. That the appellant has got no cause of action & locus standi.
 2. That the appeal is bad for misjoinder/non-joinder of necessary parties.
 3. That the appeal is time barred.
 4. That the appellant has not come with clean hands.
 5. That the appellant is estopped due to his own conduct.
 6. That the appellant has concealed the material facts from this Honourable Tribunal.
 7. That appeal is not maintainable & incompetent in the present form.
 8. The honourable Tribunal has no jurisdiction to entertain the appeal.

BRIEF FACTS

1. Pertains to record.
2. Correct to the extent that his name was senior on merit as compared to his colleagues of DIKhan Region herein impugned as Respondents No. 17 to 21, out of which Respondents 19 to 21 were against Shuhada's quota.
3. That in order to determine the interse seniority of Appellant and his colleagues (herein Respondents No.17 to 21) being of one batch, a proper committee was constituted and the Appellant placed senior to Respondents No. 17 to 21 vide Seniority List as it stood on 31.12.2013. Copy attached as Annexure 'A'.

Whereas the Respondents 4 to 16 are senior to the Appellant because their names were brought on Seniority List 'E' in 2010 & 2011 as compared to Appellant which was brought on Seniority List in 2012 on completion of probation period.

The same issue was also decided by the Committee at CPO that probationer contention to bring their name on list "E" with retrospective effect is not justified.

Copy attached as Annexure "B".

4. That upon appeal/objection, proper committee was constituted and Appellant was assigned seniority over his colleagues/batch-mats i.e. Respondent No. 17 to 21.

Copy already Annexed 'A'.

5. Incorrect. That upon appeal/objection, proper committee was constituted and Appellant was assigned seniority over his colleagues/batch-mats i.e. Respondent No. 17 to 21. The same issue was also decided by the Committee at CPO that probationer contention to bring their name on list "E" with retrospective effect is not justified.

6. That the Appellant has got no locus standi. He has been assigned seniority over his colleagues i.e. Respondent No. 17 to 21 whereas Respondents No. 4 to 16 are senior to Appellant as their names were brought on List 'E' in 2010 & 2011 and that of Appellant in 2012. Copy Annexed "C".

GROUNDS

a. Incorrect. The Appellant has been assigned seniority over his colleagues/batch-mat i.e. Respondent No. 17 to 21.

b. Incorrect. Respondent No. 4 to 16 are senior to the Appellant in all respect. As per Police Rules 13-11 the names shall be entered in the List 'E' in order according to the date of admission, according to which names of Respondent 4 to 16 were brought in List 'E' in 2010 & 2011 whereas that of appellant in 2012.

c. Incorrect. The Respondents No. 1 & 2 have followed the law and rules on subject.

d. Incorrect. The Seniority List as stood on 31.12.2013 has been prepared in accordance with Police Rules.

e. Incorrect. As replied in above Para.


f. Incorrect. As replied in Para 'b' of grounds.

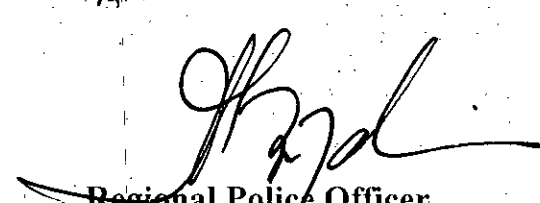
g. Incorrect. As stated at Para No. 3 & 4 above.


h. Incorrect. The appeal is infructuous as the seniority of Appellant has been rectified by assigning seniority over his colleagues/batch-mats i.e. Respondents No. 17 to 21. The appellant was treated as per law and rules.

PRAYER

It is, therefore, most humbly prayed that on acceptance of instant parawise comments, the Appeal of the Appellant being devoid of legal footings and merits may graciously be dismissed.


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


Regional Police Officer,
Dera Ismail Khan
(Respondent No.2)


Dy: Inspector General of Police
HQrs, Khyber Pakhtunkhwa, Peshawar
(Respondent No.3)

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

Service Appeal No. 1156/2014

Saleem Pervez (ASI No. 87/D)

s/o Ghulam Qasim r/o Garhi Sadozai Dera Ismail Khan.....(Appellant)


Versus

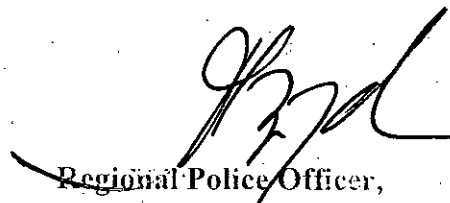
1. The Provincial Police Officer (IGP), Khyber Pakhtunkhwa Peshawar.
2. The Regional Police Officer (DIG), Dera Ismail Khan
3. The Dy: Inspector General of Police, HQrs, KPK Peshawar.

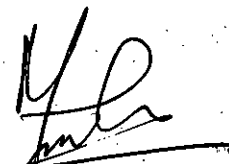
.....(Respondents-1to3)

COUNTER AFFIDAVIT ON BEHALF OF RESPONDENTS

We, the respondents do hereby solemnly affirm and declare on oath that the contents, of Comments/Written reply to Appeal are true & correct to the best of our knowledge and nothing has been concealed from this Honourable Tribunal.


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


Regional Police Officer,
Dera Ismail Khan
(Respondent No.2)


Dy: Inspector General of Police
HQrs, Khyber Pakhtunkhwa, Peshawar
(Respondent No.3)

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

Service Appeal No. 1156/2014

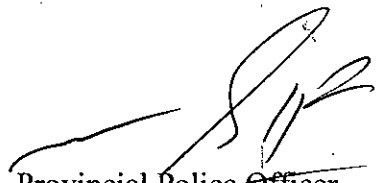
Saleem Perez ASI No. 87/D, District D.I.Khan


Versus


Inspector General of Police, Khyber Pakhtunkhwa & Others

AUTHORITY LETTER

We the Respondents in the above cited Service Appeal do here by authorized Imtiaz Ali Khan DSP/Legal, DIKhan to represent us before the Service Tribunal he is authorized to submit comments and reply etc on our behalf.


Provincial Police Officer
Khyber Pakhtunkhwa Peshawar
(Respondent No. 1)


Regional Police Officer,
Dera Ismail Khan
(Respondent No. 2)


Dy: Inspector General of Police
HQrs: Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 3)

Subject: SENIORITY LIST 'E'

1. Seniority List 'E' for the year 2012 was published as per date of appointment of PASIs in their Service Books, in which PASI Salim Parvez stood junior to others.
2. That proposed list for 2013 was prepared as per revised notification of date of appointment as per arrival in Daily Dairy, in which PASI Salim Parvez got seniority but PASI Minhaj Sikandar suffered his seniority and PASI on Shuhada's quota become senior, which was objected.
3. That now if the seniority of PASIs on merit and PASIs Shuhada quota is fixed as per notification of appointment issued by the worthy IGP, the PASIs on merit will get their seniority as compared to PASIs of Shuhada's quota.


Submitted for kind perusal and approval or otherwise.


(JAVED AHMAD)
Inspector Legal,
DIKhan District


(IMTIAZ ALI)
Inspector Legal,
RPEO Range Office


(ABDUL HAMID)
Establishment Clerk
Range Office, DIKhan

Approved.


Dy. Inspector, Range Office
D.I. Khan Range Office

MINUTES OF THE MEETING REGARDING SENIORITY CASE OF PROBATIONER ASIS AND PROMOTEE ASIS HELD ON 08.07.2013.

A meeting of the committee held on 08.07.2013 at the office of AIG/Establishment CPO, Peshawar to discuss the seniority case of Probationer ASIs and promotee ASIs of CCP, Peshawar.

The following attended the meeting:-


1	Syed Fida Hassan Shah, AIG/Establishment CPO	Chairman
2	Mr. Masood Ahmad Khalil, SSP/Investigation CCP, Peshawar	Member
3	Mian Imtiaz Gul, DSP/Legal	Member
3	Mr. Farman Khan, Office Supdt: Secret CPO	Member
4	Mr. Kiramat Ullah Office Supdt: Establishment CPO	Member
5	Mr. Farhad Ali Khan Office Supdt: CCP, Peshawar	Member

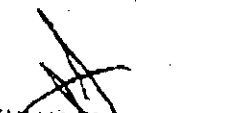
The committee after threadbare discussion came to the conclusion that the subject matter may be decided in the light of Police Rule 12.2 (3) which reproduce below:-

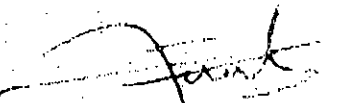
"Seniority, in the case of upper subordinates, will be reckoned in the first instance from date of first appointment, officers promoted from a lower rank being considered senior to persons appointed direct on the same date and the seniority of officers appointed direct on the same date being reckoned according to age. Seniority shall, however, be finally settled by dates of confirmation"

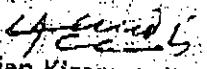
Therefore, the committee unanimously recommends that a single joint notification consisting of PASIs and promotee ASIs be prepared according to their date of confirmation as ASI and be issued accordingly. Their seniority be fixed as per Police Rules 12.2(3) mentioned above and their names to be brought on list "E" with immediate effect. The contention of PASIs to bring their names on promotion to list "E" with retrospective effect, is not justified under the rules.

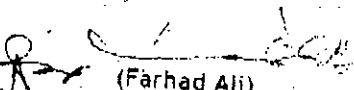

(SYED FIDA HASSAN SHAH)
CHAIRMAN
AIG/Establishment CPO,

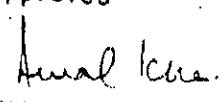

(Mr. MASOOD AHMAD KHALIL)
MEMBER
SSP/Investigation
CCP, Peshawar


(MIAN IMTIAZ GUL)
Member
DSP/Legal
CPO, Peshawar


(Mr. Farman Khan)
Member
Office Supdt: Secret CPO


(Mian Kiramatullah)
Member
Office Supdt: Establishment


(Farhad Ali)
Member
Office Supdt: CCP, Peshawar

Approved

(AWAL KHAN)
DIG/Headquarters
Khyber Pakhtunkhwa Peshawar.

SENIORITY LIST OF OFFG: SUB INSPECTORS AND CONFIRMED ASSISTANT SUB INSPECTORS ON LIST 'E' AS IT STOOD ON 31.12.2013


NOTIFICATION NO. **882** /ES, Seniority List: - The Seniority List of Offg: Sub Inspectors/ Confirmed Assistant Sub Inspectors on List 'E' of D.I.Khan Region Police as it stood on 31.12.2013 is hereby published for information to all concerned

S#.	Names & Number	Date of Birth	Date of Enlistment	Date of entry to list "E"	Promotion as Offg: SI	Education	Remarks
1	Inspector (Adhoc) Sanaullah No.1/D	05.04.1955	14.07.1973	30.11.2004	08.03.2007	Matric	
2	OSI Ghazanfar Ali No. 44 / D	10.06.1955	27.08.1974	30.11.2004	08.03.2007	Matric	
3	Inspector (Adhoc) Faridullah No.37/D	01.06.1954	01.12.1972	30.11.2004	08.03.2007	Matric	
4	OSI Imam Muhammad No. 41 / D	11.10.1954	21.03.1971	30.11.2004	08.03.2007	7th	
5	OSI Muhammad Iqbal No. 47 / D	25.06.1955	01.09.1975	30.11.2004	26.04.2007	9th	
6	OSI Muhammad Ashraf, No.54/D	05.02.1955	23.12.1978	01.01.2007	16.05.2007	F.A	
7	OSI Ghulam Bashir, No.55/D	01.01.1957	12.04.1976	01.01.2007	11.05.2007	Matric	
8	OSI Haroon-ul-Rashid, No.11/D	01.04.1957	20.03.1975	08.03.2007	08.03.2007	Matric	
9	OSI Allah Wasaya, No.56/D	11.01.1957	22.09.1975	01.01.2007	11.09.2007	Matric	
10	OSI Ghulam Khan, No.57/D	16.05.1955	17.10.1975	01.01.2007	27.10.2007	Matric	
11	OSI Mazhar Hussain Shah, 58/D	01.06.1956	18.03.1979	01.01.2007	03.11.2007	Matric	
12	OSI Muhammad Nawaz, 59/D	07.02.1955	21.02.1976	01.01.2007	26.10.2007	Matric	
13	OSI Muhammad Riaz, 61/D	01.04.1955	09.07.1976	01.01.2007	27.10.2007	Matric	
14	OSI Inayatullah, 62/D	10.10.1954	14.10.1975	01.01.2007	27.10.2007	Matric	
15	OSI Muhammad Hanif, 63/D	12.02.1957	30.10.1975	01.01.2007	27.10.2007	Matric	
16	OSI Allah Nawaz, 64/D	08.06.1958	02.09.1976	01.01.2007	27.10.2007	M.A/ LLB	
17	OSI Amir Muhammad Faqir, 67/D	22.08.1956	10.04.1976	01.01.2007	27.10.2007	Matric	
18	OSI Shah Nawaz, 45/D	15.05.1958	03.06.1976	01.06.2007	09.11.2007	Matric	
19	OSI Abdullah Khan, 68/D	12.03.1958	03.06.1976	01.06.2007	06.11.2007	Matric	
20	OSI Fazil Khan, 8/D	05.07.1957	08.04.1976	24.10.2007	08.11.2007	Matric	
21	OSI Abdul Qayyum, 71/D	09.05.1955	01.09.1975	24.10.2007	09.03.2008	9th	
22	OSI Mira Jan, 72/D	24.07.1954	27.07.1973	24.10.2007	29.02.2008	Matric	
23	OSI Shah Nawaz, 73/D	22.06.1956	15.09.1975	24.10.2007	17.04.2008	Matric	
24	OSI Abdul Majeed, 75/D	03.06.1956	18.11.1976	24.10.2007	08.05.2008	Matric	
25	OSI Muhammad Hashim, 79/D	12.06.1959	13.02.1980	19.05.2008	05.06.2008	Under Matric	Reverted to the rank of ASI
26	OSI Rustam Khan, 80/D	13.04.1958	20.12.1976	19.05.2008	13.12.2008	Under Matric	
27	OSI Shama Jan, 81/D	03.12.1959	28.09.1978	19.05.2008	16.12.2008	Matric	
28	OSI Sabir Shah, 14/D	06.10.1958	27.09.1978	25.07.2008	04.12.2008	F.A	
29	OSI Abdul Hamid, 15/D	10.05.1956	24.11.1976	25.07.2008	14.12.2008	Matric	Retired from service w.e.from 01.03.14
30	OSI Amir Abdullah, 20/D	07.02.1958	23.11.1981	25.07.2008	04.02.2008	Matric	
31	OSI Allah Bahsh, 82/D	01.03.1955	28.02.1980	25.07.2008	01.03.2009	Matric	
32	OSI Bashir Hussain, 83/D	05.03.1960	16.01.1979	25.07.2008	21.02.2009	F.A	

33	OSI Muza Mir, 9/D	01.01.1957	08.09.1979	01.01.2009	21.06.2009	Matric	
34	OSI Shan Jehan, 12/D	25.06.1955	31.10.1975	01.01.2009	25.06.2009	9th	
35	OSI Matta Hussain, 16/D	08.04.1954	02.04.1979	01.01.2009	25.06.2009	Matric	
36	OSI Faiz Kaleem, 19/D	06.09.1960	01.04.1980	01.01.2009	08.08.2009	Matric	Reverted to the rank of ASI
37	OSI Ghulam Yasin, 24/D	04.02.1960	28.01.1985	01.01.2009	06.08.2009	Matric	
38	OSI Muhammad Nawaz, 34/D	05.01.1961	30.01.1979	01.01.2009	07.08.2009	9th	
39	OSI Ghulam Kazim, 35/D	15.04.1960	18.01.1979	01.01.2009	12.08.2009	9th	Reverted to the rank of ASI
40	OSI Abdul Latif, 84/D	16.10.1960	06.03.1979	01.01.2009	07.08.2009	Matric	
41	OSI Inayatullah, 85/D	10.03.1960	05.03.1980	01.01.2009	06.08.2009	Matric	Reverted to the rank of ASI
42	OSI Mir Ajab, 23/D	11.10.1956	23.12.1978	31.07.2009	08.09.2009	Matric	Retired from service w.e.from 01.03.14
43	OSI Alla-ud-Din, 29/D	06.05.1960	01.06.1978	31.07.2009	08.09.2009	F.A	
44	OSI Sajawal Khan, 60/D	01.01.1960	27.08.1978	31.07.2009	08.09.2009	Matric	
45	OSI Fazal Hussain Shah, 66/D	01.01.1958	09.04.1976	31.07.2009	09.09.2009	Matric	
46	OSI Saadullah Khan, 96/D	01.08.1958	07.12.1979	31.07.2009	10.09.2009	Matric	
47	OSI Mir Aslam, 100/D	01.01.1958	06.07.1976	31.07.2009	11.12.2009	Matric	
48	OSI Allah Dad, 97/D	21.01.1959	07.11.1978	31.07.2009	12.12.2009	Matric	
49	OSI Muhammad Nawaz, 99/D	01.05.1960	27.05.1978	31.07.2009	14.12.2009	Matric	Reverted to the rank of ASI
50	OSI Muhammad Iqbal, 18/D	19.04.1978	10.10.2006	01.02.2010	23.06.2011	BA/LLB	
51	OSI Sadiqullah, 53/D	01.08.1969	29.12.2006	01.02.2010	23.06.2011	M.A	
52	OSI Saif-ur-Rehman, 31/D	16.10.1975	29.12.2006	01.02.2010	14.12.2012	M.A	
53	OSI Muhammad Alamgir, 49/D	06.10.1980	29.12.2006	01.02.2010	14.12.2012	M.A	Reverted to the rank of ASI
54	OSI Muhammad Imran, 52/D	02.02.1982	29.12.2006	01.02.2010	14.12.2012	B.A	
55	OSI Fazal Rahim, 33/D	10.03.1963	02.03.1982	15.03.2010	14.12.2012	Matric	
56	OSI Mumtaz Khan, 104/D	01.06.1965	26.12.1987	20.07.2010	14.12.2012	B.A	
57	OSI Syad Sagheer Abbas Shah, 42/D	09.04.1934	05.10.2007	06.10.2010	14.12.2012	F.A	
58	OSI Abdullah Khan, 6/D	20.07.1961	05.04.1981	15.06.2011	05.09.2013	Matric	
59	OSI Allah Nawaz, 7/D	18.08.1955	07.03.1975	15.06.2011	26.12.2013	F.A	
60	OSI Liaqat Ali, 50/D	10.01.1959	21.11.1978	15.06.2011	26.12.2013	F.A	
61	OSI Pervez Hussain, 69/D	15.04.1973	11.10.1993	15.06.2011	05.09.2013	F.A	
62	OSI Adam Khan, 78/D	09.11.1958	18.11.1976	15.06.2011	26.12.2013	Matric	
63	OSI Inamullah, 98/D	09.01.1967	01.07.1989	15.06.2011	05.09.2013	Matric	
64	OSI Abdul Ghani, 107/D	01.03.1957	21.10.1975	15.06.2011	26.12.2013	Matric	
65	OSI Ghulam Farid, 109/D	10.06.1960	25.09.1980	15.06.2011	26.12.2013	Matric	
66	OSI Shah Nadir, 110/D	10.09.1957	14.10.1975	15.06.2011	26.12.2013	Matric	
67	OSI Muhammad Yaqoob, 111/D	01.12.1956	20.10.1975	15.06.2011	26.12.2013	9th	
68	ASI Muhammad Ashraf, 112/D	05.04.1960	18.04.1978	15.06.2011	-	9th	Reverted as HC and removed from List 'E'
69	ASI Saleem Parvez, 87/D	01.03.1978	19.02.2009	20.02.2012	-	B.Sc	Revised Seniority vide Notification No.849 dated 11.03.2014
70	ASI Minhaj Sikandar Yar Khan, 88/D	19.09.1981	19.02.2009	20.02.2012	-	MBA-IT/ LLB	Revised Seniority vide Notification No.849 dated 11.03.2014
71	ASI Ebad Wazir, 89/D (on deputation to CCP)	27.01.1982	19.02.2009	20.02.2012	-	MA/LLB	Revised Seniority vide Notification No.849 dated 11.03.2014
72	ASI Muhammad Adnan, 91/D	14.04.1989	07.03.2009	08.03.2012	-	F.Sc	Revised Seniority vide Notification No.849 dated 11.03.2014
73	ASI Shanullah, 93/D	05.02.1981	07.03.2009	08.03.2012	-	F.A	Revised Seniority vide Notification No.849 dated 11.03.2014

Dr. Inspector General of Police
I.I. Khan Rande D.I. Khan


74	ASI Kashif Sattar, 92/D	06.04.1985	07.03.2009	08.03.2012	-	F.Sc	Revised Seniority vide Notification No.849 dated 11.03.2014
75	ASI Fazal-ur-Rehman, 94/D	02.03.1987	07.03.2009	08.03.2012	-	F.A	Revised Seniority vide Notification No.849 dated 11.03.2014
76	ASI Naqeeb Ullah No.95/D	10.08.1989	07.03.2009	08.03.2012	-	F.A	Revised Seniority vide Notification No.849 dated 11.03.2014
77	ASI Abdul Ghani, 10/D	11.01.1957	28.10.1976	23.04.2012	-	Matric	Revised Seniority vide Notification No.849 dated 11.03.2014
78	ASI Jan Muhammad, 21/D	07.03.1962	19.02.1981	23.04.2012	-	9th	
79	ASI Ghulam Ali, 39/D	12.11.1957	21.06.1976	23.04.2012	-	Matric	
80	ASI Said Marjan, 40/D	20.11.1965	26.11.1984	23.04.2012	-	Matric	
81	ASI Muhammad Ramzan, 2/D	07.04.1977	01.09.1995	13.03.2013	-	Matric	Reverted as HC and removed from List 'E'
82	ASI Muhammad Tahir, 101/D	18.10.1980	17.03.2010	18.03.2013	-	Matric	On deputation to PTC Hangu
83	ASI Sabir Hussian, 102/D	02.04.1981	17.03.2010	18.03.2013	-	F.Sc	
84	ASI Shah Muhammad, 103/D	03.09.1976	18.03.2010	19.03.2013	-	M.A	
85	ASI Zafar Ali Shah, 43/D	01.01.1980	12.08.2010	13.08.2013	-	M.A	
86	ASI Fahim Mumtaz, 70/D	01.03.1991	12.08.2010	13.08.2013	-	B.A	
					-	F.Sc	



 (ABDUL GHAFOOR AFRIDI)
 PSP/PPM
 Deputy Inspector General of Police,
 Dera Ismail Khan Region

No. **883-89** /ES dated D.I.Khan the **12-03-2014**
 Copy of above is forwarded for information & necessary action to the: -

- 1 The Additional Inspector General of Police, Investigation, Khyber Pakhtunkhwa, Peshawar.
- Two spare copies of the notification are enclosed for publication.
- 2 The Commandant, Police Training College, Hangu
- 3 The Capital City Police Officer, Peshawar
- 4-5 The District Police Officers, D.I.Khan & Tank.
- 6-7 The Superintendent of Police, Investigation, D.I.Khan & Tank

They are requested to please inform all the Police Officers serving under their command. Any officer who have objection on his seniority he should submit his representation within one month after the issue of the list

EC-II
To info all
concerned.
E/C
for action

 6
 2/3/14


 (ABDUL GHAFOOR AFRIDI)
 PSP, PPM
 Deputy Inspector General of Police,
 Dera Ismail Khan Region

④ 11/16

110-588

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BEFORE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No: 1156 of 2013

Saleem Pervez (Appellant)

VERSUS

IGP, and others (Respondents)

COMMENTS ON BEHALF OF RESPONDENT NO: 5

PRILIMINARY OBJECTIONS:

1. Appellant has no cause of action and locus standi to file present appeal.
2. Appeal is barred by time.
3. Appeal is bad for want of necessary parties.
4. Seniority list is clear and correctly prepared in the light of Police Rules.
5. Appellant is estopped to file present appeal due to his conduct.
6. Appeal has malafidely been filed just to harras and humiliate the answering respondent and others.

ON FACTS:

1. Pare No: 1 pertains to record, needs no reply.
2. It is not correct and is mere self assesment.
3. Seniority list is absolutly correct. It bears correct and true entries of the service record. It is prepared in the light of Police Rules. Answering respondent No: 5 is senior to appellant. Answering respondent is at serial No: 60 whereas; appellant is at serial No: 78 of the list. Answering respondent was inducted in the force on

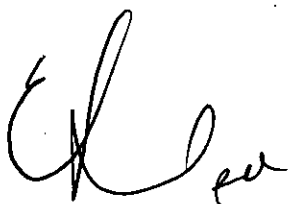


26.12.1987 as constable. He passed his Lower Class Course in the year 1993-94, Intermediate Course in the year 2001-2002 and Upper Class Course in the year 2010-2011. Answering respondent was enlisted in "List-E" on 20.07.2010. Appellant's name was entered in List-E on 27.03.2012. It is clear that he is junior to the answering respondent.

4. It is incorrect. Appellant has no locus standi to file any departmental appeal.
5. Does not pertain to answering respondent, hence denied.
6. Appellant has no locus standi and cause of action to file present appeal. Appeal is bad for non joinder of necessary parties.

ON GROUNDS:-

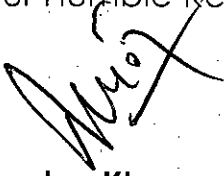
- a. Incorrect. Seniority list has been correctly prepared and is true.
- b. It is false in Toto. Appellant's seniority position is clear from the list. He is much junior to the answering respondent. Seniority is always considered from the date of confirmation in service and not from the date of appointment. Hence the stance of appellant is incorrect, false, wrong and phony.
- c. It is incorrect. Seniority List is correctly prepared strictly in accordance with law and Police Rules.
- d. It is wrong, detail answer is given above.
- e. It is false and incorrect. Seniority list is correct and true.



- f. It is mere an imigation and speculation of appellant. As mentioned above, seniority list is clear, correct and true. The same is prepared in the four corners of Police Rules.
- g. It is mere self assesment of the appelant, which in no manner advances appallant's false case.
- h. It is incorrect.

It is requested that this Hon'ble Tribunal may graciously be pleased to dismiss the appeal in hands with costs.

Your Humble Respondent No: 5



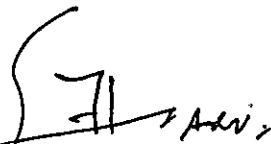
Mumtaz Khan

Through Counsel



Ehsan Ul Haq Malik

Advocate, Dera Ismail Khan



Syeda TalaT Zahra

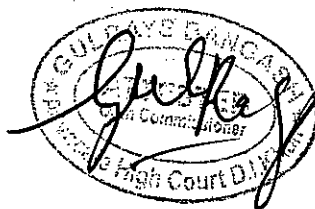
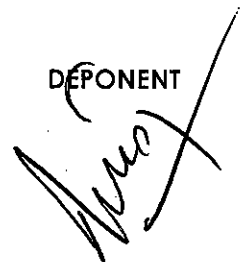
Advocate, Dera Ismail Khan

October 18, 2014

AFFIDAVIT

I; do hereby solemnly affirm and declare on oath that the contents of accompanying comments are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

DEPONENT

وکالت نامہ

قیمتی ایک روپیہ		کورٹ فیس
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عدالت جسٹس سید سید علی شاہ ریاست بہاولپور
 نام سید سلیم بیگم
 دعویٰ یا جرم سوس ریلوی ڈپارٹمنٹ 11567
 تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

سید سلیم بیگم
 سوس ریلوی ڈپارٹمنٹ

احسان الحق صدر سیدہ ظہیرت زبیرہ / سیدہ امیر حفیظہ امیر و کونسل

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جواب دہی برائے پیشی یا تصفیہ مقدمہ بنام
 کو جب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بڑا بذریعہ رو برو عدالت حاضر ہوتا ہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
 موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب
 موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل
 بیرون کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے
 پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ دہا لینے کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے کچھ
 کو کل سماعت پر وادخست صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذکری
 نظر ثانی اپیل نگرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر پاشی یا راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے
 تاریخ پیشی مقدمہ مذکور بیرون از پکھری صدر پیروی مقدمہ مذکور نظر ثانی اپیل و نگرانی و برآمدگی مقدمہ یا منسوخی و ذکری یک طرفہ یا درخواست حکم اختتامی یا قری
 یا گرفتاری قبل از فیصلہ اجراء ذکری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ ضمانت پیروی کا اختیار ہو گا اور تمام ساختہ پرداختہ صاحب موصوف مثل کردہ
 از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی
 اپیل نگرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا ایئر سز کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دی اور ویسے
 اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواہ پڑے گا وہ صاحب موصوف کا حق ہو گا مگر
 صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت
 میں نہ اپنی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے
 مورخہ 18 مارچ 1992

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

ممتاز خان
 Accepted
 Accepted
 Accepted
 Accepted

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



Service Appeal No. 1156/2013

Saleem Pervez (Appellant)

Versus

Provincial Police Officer and others(Respondents)

**WRITTEN REPLY ON BEHALF OF RESPONDENT NO.18
(Minhaj Sikander Yar Khan)**

Respectfully Sheweth,

PRELIMINARY OBJECTIONS

1. That the appeal is not maintainable and incompetent in the eyes of Law in the present form because the tentative seniority list have been objected and in absence of final order this tribunal lack jurisdiction under section 4 of service tribunal act, 1974.
2. That the appellant is estopped due to his own conduct to file this appeal.
3. That the appellant has got no cause of action and locus standi to file instant appeal.
4. That the appellant has not come to the Tribunal with clean hands and has suppressed all relevant facts.
5. That Seniority is not a vested right under the existing service laws.
6. That the appeal is bad for misjoinder/ non-joinder of necessary parties.
7. That the appeal is badly time barred and the appellant has concealed the material facts from Honourable Tribunal.
8. That the Honourable Service Tribunal has no jurisdiction to entertain the instant appeal in its present form.
9. That the appeal has been mis-oriented, mis-constructed and mistakenly drawn and is incompetent in its present form and context, and is liable for Rejection.
10. That the appeal is weak having no force, fabricated, fictitious, based on ill will, malafide and having no footings in the eyes of law.
11. That the appellant cannot invoke the Jurisdiction of this tribunal in absence of Final Order.
12. That the Petitioner has ignored to file the appeal to appellate authority, when there is provision under Appeal Rules, 1986.
13. That in the absence of representation/departmental appeal, the appellant cannot file appeal U/s 4 of KP Service Tribunal Act, 1974.

14. That proceeding with the instant appeal would be a futile exercise and just wastage of the precious time of this Honourable Tribunal.
15. That as stated in the objections supra, the appeal is bereft of cause of action and is liable for dismissal.

BRIEF FACTS

1. This para is correct to the extent of induction of the appellant into Police Service on merit on the recommendation of Public Service Commission along-with the answering respondent.
2. This para is Correct to the extent that the name of appellant was placed senior in term of merit as compared to his colleagues of DIKhan Region herein impugned as Respondents No. 17 & 18, while the Respondents 19 to 21 were against recruited on Shuhada's quota.
3. This para is correct to the extent that in order to determine the interse seniority of Appellant and his colleagues (herein Respondents No.17 to 21) being of one batch, a proper committee was constituted on objection over tentative seniority E-List and the Appellant was placed senior to the Respondents No. 17 to 21 vide revised notifications No 4185-88/ES dated 31/12/2013 and No 849-53 /ES dated 11/03/2014. Copies are attached as Annexure 'A' & 'B'.

Whereas, the Respondents 4 to 16 are junior to the Appellant and answering Respondent as per Police Rules, according to which the seniority among the ASIs is required to be fixed from the **date of initial appointment** in the said rank while in the impugned Seniority list, officers placed at serial numbers 59 to 71 are junior to the appellant as well as to the answering Respondent because the date of confirmation of the appellant and answering respondent is much earlier than them. The date of confirmation of the Respondents No. 4 & 6 is 15/03/2010 & 20/07/2010, respectively and date of confirmation of Respondents No. 07 to 16 is 09/06/2011, hence, they were confirmed latter in time from the Appellant and answering respondent as Assistant Sub Inspector because they are confirmed from that of their appointment i.e 19.02.2009.

4. This para is correct to the extent that upon objection petition over tentative seniority "E" list, a proper committee had been constituted and Appellant was assigned seniority over his colleagues/batch-mats i.e. Respondent No. 17 to 21 including the answering respondent.

5. This para is correct to the extent that the appellant regained his seniority over his colleagues/batch-mats i.e. Respondent No. 17 to 21 on the recommendation of the committee. However, he ignored/failed to file appeal to the appellate authority i.e Respondent No. 1 regarding placement of Seniority (Seniority list E) in respect of Respondent No 4 to 16.
6. That the Appellant has got no locus standi to file the instant service appeal in absence of final Seniority List. The appellant preferred no departmental appeal; hence, he cannot invoke the jurisdiction of this Tribunal u/s 4 of KP Service Tribunal Act, 1974.

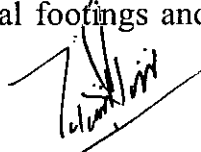
GROUNDS

- a. Correct to the extent that the Appellant has been assigned seniority over his colleagues/batch-mat i.e. Respondent No. 17 to 21 while the rest of the private respondents are junior from the appellant as well as answering respondent.
- b. This para is correct in all respect except ineffective upon the rights of Seniority of answering Respondent.
- c. Incorrect. The appellant neither file representation on final seniority list nor objected on the promotion of private respondents to List 'F' for the purpose of promotion to the rank of inspector besides never opted to made those orders impugned in the instant service appeal.
- d. This para is correct to the extent of all private respondents except answering respondent.
- e. Correct to the extent that the seniority list needs to be corrected to the effect of private respondents No 4 to 16 as per police rules and judgements of the Honourable Supreme Court of Pakistan.
- f. Correct to the extent that the same was prepared while ignoring the Appellant and answering respondent being senior ab-anitio ought to have been placed above the junior incumbents i.e. Respondents No. 4 to 16 in light of the settled rules, Esta Code and rules of promotion in service.
- g. Correct to the extent that the answering respondent has been discriminated and wrongly placed junior in the impugned seniority list. Respondents thus acted in violation of law & rules since the impugned seniority list is on the face of it without any reason/ grounds as well as militates against law and rules hence, ineffective upon the rights of the answering respondent.
- h. Incorrect. The appeal is infructuous as the seniority of Appellant has been rectified by assigning seniority to him over his colleagues/batch-mats i.e.

Respondents No. 17 to 21 while he has been slept over his rights at the time of promotion of rest of the private Respondents No 04 to 16.

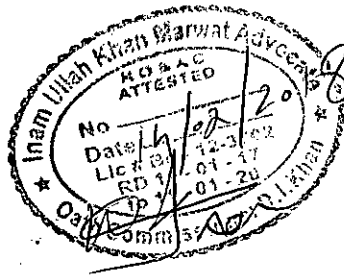
PRAYER

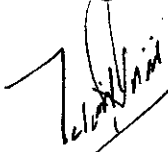
It is, therefore, most humbly prayed that on acceptance of instant para-wise comments, the Appeal of the Appellant being devoid of legal footings and merits may graciously be dismissed.



(Minhaj Sikander)
(Respondent No.18)

AFFIDAVIT

I, Mohammad Abdullah Baloch, Advocate High Court, Counsel for the Defendant No 18, on instruction of the Client, do hereby solemnly affirm and declare on oath that all the Para wise comments of above service appeal are true & correct to the best of my knowledge, belief and information so provided to me and that nothing has been deliberated concealed from this Hon'ble Service Tribunal.




Deponent
Minhaj Sikander
(Through counsel)


Mohammad Abdullah Baloch
(Advocate High Court, D.I.Khan)

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A

POLICE DEPARTMENT

D.I.KHAN RANGE

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDERS BY THE DY; INSPECTOR GENERAL OF POLICE, D.I.KHAN

REVISED NOTIFICATION

Dated D.I.Khan the 31/12/2013

No. 4185 /ES, PROMOTION LIST 'E', As the date of appointment of following PASIs has been revised vide DPO DIKhan Notification Endst: No.9195-99 dated 21.05.2012, therefore the date of appointment is also revised in the seniority List 'E' issued vide this office No.555-62/ES dated 11.02.2013. Similarly as they belong to same badge, therefore their names placed in the seniority list 'E' according to their date of birth as per Police Rules: -

S#	Name & No.	Date of birth	Date of enlistment	Date of entry to list 'E'
1	PASI Saleem Parvez, 87/D	01.03.1978	11.04.2009	12.04.2012
2	PASI Minhaj Sakandar Yar Khan, 88/D	19.08.1981	14.04.2009	15.04.2012
3	PASI Ebad Wazir, 89/D	27.01.1982	16.04.2009	17.04.2012

(Signature)
o/e (ABDUL GHAFUOR AFRIDI)
PSP, PPM
Deputy Inspector General of Police,
Dera Ismail Khan Region

OFFICE OF THE DY; INSPECTOR GENERAL OF POLICE, DERA ISMAIL KHAN

No. 4186-88 /ES Dated D.I.Khan the 31/12/2013

Copy of above is forwarded for information to the: -

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar
2. Addl: Inspector General of Police, Investigation, Khyber Pakhtunkhwa Peshawar. Two spare copies of the notification are enclosed for publication.
3. District Police Officer, DIKhan

(Signature)
o/e (ABDUL GHAFUOR AFRIDI)
PSP, PPM
Deputy Inspector General of Police,
Dera Ismail Khan Region

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B

POLICE DEPARTMENT

D.I.KHAN RANGE

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDERS BY THE DY: INSPECTOR GENERAL OF POLICE, D.I.KHAN

REVISED NOTIFICATION

Dated D.I.Khan the

11/03/2014

No. 249 /ES, APPOINTMENT AS PASI, In supersession of this office Notification No.4186-88/ES dated 31.12.2013 and No.4190-92/ES dated 31.12.2013, and in the light of guidance communicated vide CPO Peshawar No.16399-404/E-II dated 11.07.2013, the interse seniority of the following Probationer ASIs is fixed as per Police Rule 12-2 (3) there being great contradiction in their date of arrival and medical fitness. Therefore the Probationer ASIs selected on merit vide Order Notification No.3867-73/E-II dated 12.02.2009 issued by Provincial Police Officer, Khyber Pakhtunkhwa Peshawar being appointed prior to PASI of Shuhada quota vide separate Notification No.5908-13/E-II dated 02.03.2009: -

1. PASI Saleem Parvez No.87/D ✓
2. PASI Minhaj Sikandar No.88/D ✓
3. PASI Ebad Wazir No.89/D ✓
4. PASI Muhammad Adnan No.91/D ✓
5. PASI Sharifullah No.93/D ✓
6. PASI Kashif Sattar No.92/D ✓
7. PASI Fazal Rehman No.94/D ✓
8. PASI Naqeeb Ullah No.95/D ✓

o/c (ABDUL GHAFOOR AFRIDI)
PSP, PPM
Deputy Inspector General of Police,
M. Dera Ismail Khan Region

OFFICE OF THE DY: INSPECTOR GENERAL OF POLICE, DERA ISMAIL KHAN

No. 250-53 /ES

Dated D.I.Khan the

11/03/2014

Copy of above is forwarded for information to the: -

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar
2. Addl: Inspector General of Police, Investigation, Khyber Pakhtunkhwa Peshawar. Two spare copies of the notification are enclosed for publication.
3. District Police Officer DIKhan & Tank

o/c (ABDUL GHAFOOR AFRIDI)
PSP, PPM
Deputy Inspector General of Police,
M. Dera Ismail Khan Region



OFFICE OF THE
**REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION**

☎ 0966-9280291 Fax # 9280290
✉ estt.rpo.dik@gmail.com



No: 7673 / ES

dated D.I.Khan the

07/11/2022

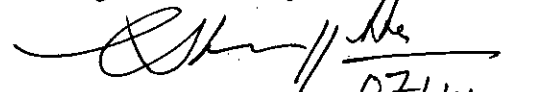
To: The Registrar,
Service Tribunal Khyber Pakhtunkhwa,
Peshawar.

Subject: **SERVICE APPEAL NO.1156/2013 (SALEEM PERVAZ VS GOVT. OF KP ETC)**

Memorandum

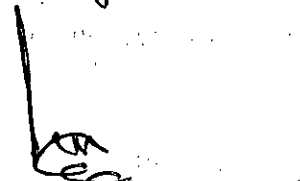
Kindly refer to your office order Judgment dated 01.07.2022 in the subject cited service appeal.

Enclosed find herewith detailed order passed by the undersigned in the subject cited appeal for further necessary action, please.


Regional Police Officer,
Dera Ismail Khan

placed in relevant file.

R/Keopar.


8/11/2022

BEFORE THE HON'BLE, KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1156/2013

Saleem Pervaiz.....VERSUS.....Government

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Deponent
08/11/2022

No. 7672 /ES,

Dated DI Khan the

07/11/2022.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Saleem Pervez S/O Ghulam Qasim Caste Baloch R/O Dera Ismail Khan (Petitioner)
VS

- 1) Inspector General of Police Khyber Pakhtunkhwa, Peshawar
- 2) Dy: Inspector General of Police DIKhan Range Dera Ismail Khan
- 3) District Police Officer, Dera Ismail Khan.

(Respondents)

Service Appeal

No. 1156 of 2013

Subject:- JUDGEMENT IN SERVICE APPEAL NO. 1156/2013 SALEEM PERVEZ VS GOVT.OF KP ETC.

Mr. Saleem Pervez (ASI No. 87/D) S/O Ghulam Qasim, R/O of Garhi Saddozai, Dera Ismail Khan, prayed in his service appeal titled above that "by accepting this appeal, the seniority list vide notification No. 556-62/ES, dated 11/02/2013, may please be set aside and the appellant may please be declared as senior to the respondent No. 4 to 21 with all back benefits since the date of confirmation and any other relief as seemed fit may also be ordered in favour of appellant" on the following grounds:

- a) That the impugned seniority list has no legal footing, as it is against the rules and the dicta laid down by the superior courts in their various judgments, and that it has been based on self-made formula/criteria to favour their blue-eyed with mala fide intention.
- b) That the Respondents No. 4 to 16 are junior to the appellant as the date of confirmation of the appellant is earlier than that of the respondents No. 4 to 16, and that the Respondents No. 17 to 21 are junior to the appellant according to the merit of KPK Public Service Commission and, also according to the age.

2. The Honourable Service Tribunal KP, vide their order dated 01.07.2022, referred the matter to the department for their consideration of the case of the appellant in the light of the judgment of the August Supreme Court of Pakistan after providing opportunity of hearing to both the sides and then pass a speaking order in accordance with law, rules, and judgments of the August Supreme Court of Pakistan.

3. Both parties were heard.

6. After hearing the parties and perusing the record it has transpired that there are two sets of respondents:

- a) **THE RANKERS**: Those who were appointed as ASI by way of promotion -Respondents No. 4 to 16
- b) **THE PROBATIONERS**: Those who were appointed direct as ASI by way of Initial Appointment -Respondents No. 17 to 21.
 - i. Those Probationers who were appointed at the recommendation of Khyber Pakhtunkhwa Public Service Commission (KPPSC)- Respondents NO.17&18.
 - ii. Those Probationers who were appointed at the recommendation of the Govt. of Khyber Pakhtunkhwa on Shaheed Quota (SQ) @5% of the total sanctioned strength vide Government of NWFP Home & T.As Department letter No. SO(P-I) HD/3-22/08 dated 19.02.2009 and IGP

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office Letter No. 5908-13/E-II dated 02.03.2009- Respondents NO.19, 20 & 21.

The petitioner claims that he is senior to respondents No 4 to 16 on the ground that his date of confirmation falls earlier that of theirs, and that he is senior to the respondents 17 to 21 on the ground that the stood first according to the merit list issued by the KP Public Service Commission and that he was not only senior to them (respondents 17 to 21) by way of merit but also the same by way of age. The following table reflects their Date of Birth (DOB), Dates of Appointment (DOA) as constables in case of respondents No.1 to 16 (Column No.4) and as Assistant sub-Inspectors (ASI) in case of Respondents 17 to 21 (Column No.4), Dates of promotion as Assistant Sub-Inspector (ASI) (Column No.5), Dates of Confirmation (DAC) as ASI (Column No.6), and Dates of Bringing their names on the Promotion List E (Column No.7). Respondents No.1 to 16 were appointed as ASI by way of promotion, whereas the petitioner and the Respondents No.17 to 21 were done so by way of initial appointment (Appointed direct). Moreover, Respondents No 19 to 21 were appointed direct not through the KP Public Service Commission like the petitioner and the Respondent 16 and 17 but were appointed direct on martyr's quota @ 5% quota of the permanent vacancies.

Table 1: Table showing names of the respondents to the Service Appeal No 1156/2013 and their seniority according to the Promotion List E as it stood on 31.12.2012. issued vide No.556-62/ES, dated 11.02.2013

Table with 7 columns: 1. Respondent No., 2. Seniority No. as per the Promotion List E as it stood on 31.12.2012, issued vide No. 556-62/ES, dated 11.02.2013., 3. Name & Rank, 4. DOB, 5. DOA, 6. DOP as ASI, 7. DOC as ASI, 8. Date of Bringing Name on the Promotion List "E". Rows include Inspector Fazal Raheem No.33/D, SI Mumtaz Khan No.104/D (Died), SI Abdullah Khan No.6/D (RTD), SI Allah Nawaz No.7/D (RTD), SI Liqat Ali No.50/D (RTD), Inspector Pervaz Hussain, 69/D, SI Adam Khan No.78/D (RTD), Inspector Inam Ullah No.98/D, SI Abdul Ghani No.107/D (RTD), SI Ghulam Farid No.109/D (RTD), SI Shah Nadir No.110/D (RTD), SI Muhammad Yaqoob No.111/D (RTD), SI Muhammad Ashraf No.112/D (Died), Sub Inspector Ebad Wazir No., Inspector Minhaj Sikandar, Inspector Kashif Samar No. 92/D, Inspector Muhammad Adnan No. 91/D, Fazal ur Rehman No. 94-D, Saleem Pervez No.87/D.

- 7. Prayer of the Petitioner requires us to address the following three issues:
7.1 DATE OF APPOINTMENT: What is the Date of Appointment of the Petitioner and the Respondents according to the impugned Seniority List E as it stood on 31.12.2012 issued vide No.556-62/ES, dated 11.02.2013; and what ought to be the Date of Appointment of the petitioner and respondents according to law?
7.2 DATE OF CONFIRMATION: what is the Date of Appointment of the Petitioner and the Respondents according to the impugned Seniority List E as it stood on 31.12.2012 issued vide No.556-62/ES, dated 11.02.2013; and what ought to be the Date of Confirmation of the petitioner and respondents according to law?
7.3 DATE OF BRINGING NAMES ON THE SENIORITY LIST E: what is the Date of Bringing names the Petitioner and the Respondents according to the impugned Seniority List E as it

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stood on 31.12.2012 issued vide No.556-62/ES, dated 11.02.2013; and what ought to be the Date of Bringing names the Petitioner and the Respondents on the Promotion List E according to according to law?

- 7.4 PRINCIPLES OF SENIORITY: which principles of authority have been adopted while placing the names of the Petitioner and the Respondents according to the impugned Seniority List E as it stood on 31.12.2012 issued vide No.556-62/ES, dated 11.02.2013; and what ought to be the principles to be adopted while placing names of the petitioner and the Respondents in the Seniority List and what ought to be the Final Seniority in the light of legal position held in this judgment?

7.1 DATE OF APPOINTMENT

7.1.1 What is the Date of Appointment of the Petitioner and the Respondents according to the impugned Seniority List E as it stood on 31.12.2012 issued vide No.556-62/ES, dated 11.02.2013; and what ought to be the *Date of Appointment* of the petitioner and respondents according to law? The following questions in this regard are also relevant.

- a) What is and what should be the date of appointment of the petitioner and those appointed direct on Shaheed quota basis?
- b) Is it the date on which approval of the recommendation of the N.W.F.P Public Service Commission by the IG KP was received by the office of the office of DIG DI Khan OR the date on which DIG DI Khan formally appointed him as ASI vide his Order No.1164-65/ES, dated 06.04.2009 (ANNEX J)? Analogically speaking, the issue boils down to the question: should the date of birth of a child be the one on which he/she is born by his/her mother OR the one he/she had conceived him/her?
- c) Likewise, should the date of arrival be declared as the date of appointment or the date on which formal order of appointment by a competent authority has been issued? In this case, should 14.04.2009-the date on which the petitioner joined Police department vide *Daily Diary No.31 dated 14.04.2009 at the Police Lines DI Khan for duty*- be declared as the date of his appointment or the *date on which the petitioner formally joined the police force after having been appointed as such?*

7.1.2 Dates of appointment of the Respondents No. 4 to 16 are given in the column No. 5 above. These are in fact the date on which these Rankers were promoted as ASI from the rank of HC, and, thus, were appointed as ASI by way of Promotion.

7.1.3 According to the impugned List E the dates of appointment of the petitioner and that of the respondents are given in column No. 4 & 5 of the table 1 above. There is no dispute as to the dates of appointment of the respondents No. 4 to 16. However, the dates of appointment of the petitioner and that of the respondents No. 17 to 21 have been recorded without legal authority and are against facts as these were the dates on which they were either sent by the DIG DI Khan for medical examination- a precondition before appointment- or they joined DI Khan Police after having been appointed by the competent authority.

7.1.4 It is therefore, concluded that the date of appointment of the petitioner is 06.04.2009, vide No. 1164-65/ES, dated 06.04.2009 (ANNEX A). Dates of appointments of the Respondents 4 to 16 remains unamended in columns No. 4 of the Table 1 above. Likewise, dates of appointment of the Respondents 17 & 18 (appointed at the recommendation of N.W.F.P- PSC), and that of the Respondents No. 19, 20 & 21, recorded in column No. 3 of the table 2 and 3 below is hereby declared to be illegal on the basis of facts stated below:

- a) N.W.F.P Public Service Commission vide Letter N.W.F.P- PSC (ASI)-Interview 2009/05195, Dated 04.02.2009 (ANNEX B), recommended to IGP N.W.F.P to appoint the petitioner along with the others as ASI (BS-09).

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- b) IGP vide No 3867-73/E-II, dated 12.02.2009 (ANNEX C) wrote to the Deputy Inspector General of Police DI Khan Range that "the appointment of the following candidates [including the petitioner at serial 47] are hereby approved as Assistant Sub-Inspectors (BPS-09) (3820-230-10720) against the 25% quota reserved for direct appointment in Police Department, vide Govt. of N.W.F.P Home & T.As Department, letter No (Police) HD/03-22/2000 dated 17.10.2003" with the direction that "necessary notification regarding their appointment may please be issued subject to medical test under the relevant rules and prescribed manner under intimation to all concerned."
- c) This letter of the IGP (No 3867-73/E-II, dated 12.02.2009) was received by the office of the Deputy Inspector General of Police DI Khan Range on 19.02.2009 vide Diary No. 436/ES, dated 19.02.2009 (ANNEX D).
- d) On the same date i.e., 19.02.2009, the then Deputy Inspector General of Police DI Khan, directed the then DPO DI Khan to get them examined medically and to verify their character vide No. 582/ES, dated 19.02.2009 (ANNEX E).
- e) The IGP wrote to the then Deputy Inspector General of Police DI Khan vide 7012-18/E-II, dated 04.03.2010 (ANNEX F), and stating therein that "in continuation to this office letter no. 12755, dated 06.03.2009 on the subject noted above and to state that the inter se merit position of the recommended candidates for the post of ASI (BPS-09) in Police Department is sent here for record at your office, as per detail given below: the petitioner stood at serial No. 11 of this list and Mr. Saleem Pervez s/o Ghulam Qasim stands at No. 1 of this list.
- f) In continuation with the letter No. 3867-73/E-II, dated 12.02.2009 the then IGP wrote another letter to the Deputy Inspector General of Police DI Khan to intimate approval of the appointment of ASIs vide 5687-91/E-II, dated 28.02.2009. This letter was received on 07.03.2009 vide diary 570/ES, dated 07.03.2009 (ANNEX G).
- g) The Deputy Inspector General of Police DI Khan Range approved the appointment of the petitioner along with others as Assistant Sub-Inspectors (ASI) (BPS-09) vide No. 1164-65/ES, dated 06.04.2009 (ANNEX H) from the date of his "arrival in the district subject to the medical fitness and character verification."
- h) In the meanwhile, another batch of ASIs was recruited directly by the Govt. against the Shaheed quota. The IGP approved their appointment vide his Order No. 5908-13/E-II, dated 02.03.2009 (ANNEX I).
- i) In compliance with this approval the Deputy Inspector General of Police DI Khan approved them for appointment vide No. 1162-63/ES, dated 06.04.2009 (ANNEX J).
- j) Now enters DPO DI Khan on the stage of issuing orders of appointment.
- k) On 30.04.2009, DPO DI Khan, appointed him as Assistant Sub-Inspectors (ASI) (BPS-09) vide No. 4707-09/, dated 30.04.2009, w.e.f. 07.03.2009 (ANNEX K).
- l) On 21.05.2012 DPO DI Khan issued another order of appointment of the petitioner and his colleagues vide 9195-97/dated 21.05.2012 (ANNEX L) and revised his date of appointment from 07.03.2009 to 14.04.2009 stating therein that "their date of appointment has been reconsidered from the date of their arrival for duty at Police Lines instead of Medical Fitness."

a. 19.02.2009 is the latest date of appointment claimed by the Respondent No. 18- Mr. Minhaj Sikandar- in his Service Appeal No Execution Petition No. 223/229-2019 Minhaj Sikandar Yar Khan Vs Police Department (ANNEX Q) before the Service Tribunal KP. The record reveals that this date of appointment i.e., 19.02.2009, has never been notified by any of the competent authorities. It, however, appeared mysteriously in the Promotion List E issued vide this office Notification No. 882, endorsement No. 883-89,

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dated 12.03.2014, under the column "remarks" which states as under: "Revised Seniority vide Notification No. 849, dated 11.03.2014." Whereas Letter No. 849, endorsement. 850-53/ES, dated 11.03.2014, nowhere declares 19.02.2009 as his date of first appointment. The same is reproduced below as a ready reference; "in supersession of this office notification No. 4186-88/ES, dated 31.12.2013 and No. 4190-92/ES, dated 31.12.2013, and in the light of guidance communicated vide CPO Peshawar No. 16399-404-E-II, dated 11.07.2013, the inter se seniority of the following probationer ASIs is fixed as per Police Rule 12.2.(3) there being great contradiction in their date of arrival and medical fitness. Therefore, the probationer ASIs selected on merit vide order notification No 3867-73/E-II, dated 12.02.2009, issued by Provincial Police Officer, Khyber Pakhtunkhwa Peshawar being appointed prior to PASI of Shuuda quota vide separate notification No. 5908-13/E-II, dated 02.03.2009.

- i) PASI Saleem Pervez No. 87/D
- ii) PASI Minhaj Sikandar No.88/D
- iii) PASI Ibaad Wazir No. 89/D
- iv) PASI Muhammad Adnan No. 91/D
- v) PASI Sharifullah No.93/D
- vi) PASI Kashif Sattar No. 92/D
- vii) PASI Fazal Rehman No. 94/D
- viii) PASI Naqeebullah No. 95/D"

m) The following two tables, table 2 & 3, summarize the dates of appointment of the Petitioner and those of his batchmates along with the principles based on which they were so issued:

Table 2: Table showing different dates of first appointments of the Petitioner and his batchmates (appointed at the recommendation of KPPSC.)

1	2	3	4	5	6
S/No	Name & Rank	DOA Vide RPO DI Khan No. 1164-65/ES, dated 06.04.2009 (Date of issuance of order of appointment at his arrival in the district)	DOA Vide DPO DI Khan No. 4707-09/, dated 30.04.2009 (Date of his medical fitness)	DOA Vide DPO DI Khan No. 9195-97, dated 21.05.2012 (Date of Arrival for duty in the Daily Diary of the Police Lines)	DOA That appeared mysteriously in the Promotion List E Only Vide RPO DI Khan No.882/ES, dated 12.03.2014 (Mysterious needs to be inquired into.)
1.	Inspector Muhammad Saleem No. 87/D	06.04.2009	26.03.2009	11.04.2009	19.02.2009
2.	Inspector Minhaj Sikandar No.88/D	06.04.2009	07.03.2009	14.04.2009	19.02.2009
3.	Sub Inspector Ebad Wazir No.89/D	06.04.2009	24.02.2009	16.04.2009	19.02.2009

Source: Office record of the offices of DPOs and RPO DI Khan Range

Table 3: Table showing different dates of first appointments of the Respondents and their batchmates (appointed on SQ).

1	2	3	4	5	6
S/No	Name & Rank	DOA Vide RPO DI Khan No. 1162-63/ES, dated 06.04.2009 (Date of his arrival in the district)	DOA Vide DPO DI Khan & Tank No. 4716-18, dated 30.04.2009 & 2693-94, No.2696-97 dated 07.05.2009 respectively (Date of his medical fitness)	DOA Vide DPO DI Khan No. 9199-9201-A, dated 21.05.2012 (Date of Arrival for duty in the Daily Diary of the Police Lines)	DOA After the issuance of RPO order No. 849/ES, dated 11.03.2014
1.	PASI Muhammad Adnan No. 91/D	06.04.2009	14.03.2009	11.04.2009	07.03.2009
2.	PASI Kashif Sattar No. 92/D	06.04.2009	14.03.2009	11.04.2009	07.03.2009
3.	PASI Fazal ur Rehman No. 94/D	06.04.2009	19.03.2009	11.04.2009	07.03.2009
4.	PASI Sharif Ullah No. 93/D	06.04.2009	10.04.2009	-	07.03.2009
5.	PASI Naqeeb Ullah	06.04.2009	13.04.2009	-	07.03.2009

Source: Office record of the offices of DPOs and RPO DI Khan Range

n) Lists "E" did not remain unaffected by this oscillation of the authorities to determine the date of appointment of the present petitioner and the respondents No. 16 to 21. The following two tables- table 4 & 5, reflect the appearance of the two different dates of appointment on the two Promotions Lists "E" issued in 2013 and 2014:

Table 4: Table showing the dates of appointment of the petitioner and the Respondents 17 & 18.

S/No.	Name	DOA Vide List "E" (as it stood on 31.12.2012) Issued vide No. 556-62/ES, dated 11.02.2013	DOA Vide List "E" (as it stood on 31.12.2013) Issued vide No. 883-89/ES, dated 12.03.2014
1	Inspector Muhammad Saleem No. 87/D	26.03.2009	19.02.2009
2	Inspector Minhaj Sikandar No.88/D	07.03.2009	19.02.2009
3	Sub Inspector Ebad Wazir No.89/D	24.02.2009	19.02.2009

Source: Office record of the offices of DPOs and RPO of the DI Khan Range

Table 5: Table showing the dates of appointment of the petitioner and the Respondents 19, 20 & 21.

S/No	Name	DOA Vide List "E" (as it stood on 31.12.2012) Issued vide No. 556-62/ES, dated 11.02.2013	DOA Vide List "E" (as it stood on 31.12.2013) Issued vide No. 883-89/ES, dated 12.03.2014
1	PASI Muhammad Adnan No. 91/D	14.03.2009	07.03.2009
2	PASI Kashif Sattar No. 92/D	14.03.2009	07.03.2009
3	PASI Fazal ur Rehman No. 94/D	19.03.2009	07.03.2009
4	PASI Sharif Ullah No. 93/D	10.04.2009	07.03.2009
5	PASI Naqeeb Ullah No.95/D	13.04.2009	07.03.2009

Source: Office record of the offices of DPOs and RPO of the DI Khan Range

7.1.5 Those who were appointed by way of promotion (Rankers) and those who were appointed directly as ASIs on Shaheed quota basis did not agitate the issue of date of appointment. The present petitioner and the Respondent No. 18 agitated the issue of the dates of their appointment through the Service Appeals before the KP Service Tribunal with the aim to get senior to each other. The following questions need to be addressed while adjudicating upon the legality of the date of appointment:

- Firstly, whether DPO has legal authority to revise an order of appointment a DIG? I haven't come across a rule in Police Rules, 1934, which authorise a DPO to revise an order of the Range DIG. Therefore, dates of appointment, issued by the DPO DI Khan after the issuance of the same by the Range DIG are declared to have been issued without any legal authority.
- Secondly, although under PR 12.1 of the Police Rules, 1934, DPO, not the DIG, is the appointing authority, yet DIG DI Khan issued order of appointment of the petitioner vide No. 1164-65/ES, dated 06.04.2009 (ANNEX H) from the date of his "arrival in the district subject to the medical fitness and character verification." He did the same for those appointed on Shuhada quota vide No. 1162-63/ES, dated 06.04.2009 (ANNEX J). In compliance with this order of appointment vide No. 1164-65/ES, dated 06.04.2009 (ANNEX H) the petitioner and the Respondents formally joined the police department on the dates & DD numbers mentioned against each in column No. 6 in the table No.6 below. These are their Dates of Joining the District Police DI Khan, not of their Appointment. Both dates cannot be substituted with each other.

Table 6: Table showing the dates of appointment of the petitioner and the Respondents 19, 20 & 21.

1	2	3	4	5	6	7	
Respondent No.	Seniority No. as per the Promotion List E as it stood on 31.12.2012, issued vide No. 556-62/ES, dated 11.02.2013.	Name & Rank	Date of Birth (DOB)	Date of Appointment (DOA)	Date of Promotion (DOP) as ASI	Date of Joining District DI Khan Police	DOC as ASI
4.	59	Inspector Fazal Raheem No.33/D	10.03.63	02.03.82	01.03.07		01.03.10

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5.	60	SI Mumtaz Khan No.104/D (Died)	01.06.65	26.12.87	12.11.07		20.07.10
6.	62	SI Abdullah Khan No.6/D (RTD)	20.07.61	05.04.81	01.03.07		15.06.11
7.	63	SI Allah Nawaz No.7/D (RTD)	18.08.56	07.03.75	14.11.07		15.06.11
8.	64	SI Liaqat Ali No.50/D (RTD)	10.01.59	21.11.78	01.03.07		15.06.11
9.	65	Inspector Pervez Hussain, 69/D	15.04.73	11.10.93	01.03.07		09.06.11
10.	66	SI Adam Khan No.78/D (RTD)	09.11.58	18.11.76	01.03.07		15.06.11
11.	67	Inspector Inam Ullah No.98/D	09.01.67	01.07.89	14.05.07		15.06.11
12.	68	SI Abdul Ghani No.107/D (RTD)	01.03.57	21.10.75	16.05.07		15.06.11
13.	69	SI Ghulam Farid No.109/D (RTD)	10.06.60	25.09.80	10.06.07		15.06.11
14.	70	SI Shah Nadir No.110/D (RTD)	10.09.57	14.10.75	16.05.07		15.06.11
15.	71	SI Muhammad Yaqoob No.111/D (RTD)	01.12.56	20.10.75	16.05.07		15.06.11
16.	72	SI Muhammad Ashraf No.112/D (Died)	05.04.60	18.04.78	26.05.07		15.06.11
17.	73	Sub Inspector Ehad Wazir No.	27.01.82	24.02.09	-		24.02.09
18.	74	Inspector Minhaj Sikandar	19.08.81	07.03.09	-		07.03.09
19.	75	Inspector Kashif Sattar No. 92/D	06.04.85	14.03.09	-		14.03.09
20.	76	Inspector Muhammad Adnan No. 91/D	14.04.89	14.03.09	-		14.03.09
21.	77	Fazal ur Rehman No. 94-D	02.03.87	19.03.09	-		19.03.09
	78	Saleem Pervez No.87/D	01.03.78	26.03.09	-		26.03.09

c) Thirdly, can an inward diary number of a letter containing approval of the IGP (ANNEX D & G), referred to above, received by the DIG DI Khan may be substituted with the order of appointment issued by him vide No. 1164-65/ES, dated 06.04.2009 (ANNEX H)? Perusal of the record has revealed that the two dates of appointment- 19.02.2009, 07.03.2009 - are in fact the dates embossed by the office of the then DIG DI Khan on inward diary of receipt of the two letters ((vide No. 436/ES, dated 19.02.2009 (ANNEX D) & vide 570/ES, dated 07.03.2009 (ANNEX G))- that contained approval of the IGP N.W.F.P, in two sets of the appointment of the petitioner and all those who had been recommended by the N.W.F.P Public Service Commission to be appointed as ASI by way of initial appointment.

7.1.6 It is, therefore, concluded that 06.04.2009 vide No. 1164-65/ES, dated 06.04.2009 (ANNEX H) is the date of appointment of the present petitioner and the respondents No. 17 to 21.

7.2 DATE OF CONFIRMATION: What ought to be the Date of Confirmation of the petitioner and respondents according to law? The honourable Service Tribunal directed, vide their order date 01.07.2022, to reconsider the case of the appellant in the light of the judgment of the August Supreme Court (Civil Appeals No. 537 to 539 Of 2013 on 31.07.2013 wherein in paragraph 5 the court observed that the persons (police officers) though confirmed subsequently but their seniority had to be reckoned from the date of their appointment.

7.2.1 We take this opportunity to submit humbly that there is no rule that provides that the persons (police officers) though confirmed subsequently but their seniority had to be reckoned from the date of their appointment. Moreover, we have not come across a rule that provided that the date of confirmation of the petitioner is the date of his appointment. We substantiate our contention with the following submissions:

a) The question of date of confirmation is directly linked with that of date of appointment. Therefore, the issue at hand is both a question of fact and that of law at the same time.

i) The Question of Fact pertains to the date of appointment. It has been submitted under paragraph 7.1 that date of appointment of the petitioner and that of the respondents No. 17 to 21 is 06.04.2009, issued by the DIG DI Khan vide his Order No. 1162-63/ES, dated 06.04.2009. Appearance of 19.02.2009 as a date of appointment of the petitioner in yet another service appeal Service Appeal No Execution Petition No. 223/229-2019 Minhaj Sikandar Yar Khan Vs Police Department, that appeared for the first time in the Promotion List E issued notified vide Notification No. 882/ES, endorsement No. 883-89/ES, dated 12.03.2014, is still a mystery. A separate inquiry into this issue has been ordered to identify the architect of this date of appointment and the one who inserted it in the said Promotion List" E" as it stood on 31.12.2013. (ANNEX N).

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ii) *The Question of Law* is: what is the date of confirmation of a directly appointed ASI at the successful completion of his period of probation? Whether or not any provision of law declares expressly or impliedly that the date of confirmation of an ASI appointed direct shall be reckoned to be his date of appointment after the successful completion of his period of probation? Since PR 12.2(3) of the Police Rules, 1934, provides that "Seniority shall, however, be finally settled by date of confirmation", the determination of the date of confirmation has become the root cause of the present controversy. Relevant Police Rules 1934 nowhere declare, expressly or impliedly, that date of confirmation of the directly appointed ASIs shall be reckoned from the date of their appointment. We hereby reproduce the relevant rules on the question of probation and the date of confirmation as a ready reference:

- PR 12.8 of the Police Rules, 1934 provides that: (1) *Inspectors, Sergeants, Sub-Inspectors and Assistant Sub-Inspectors who are directly appointed will be considered to be on probation for three years and are liable to be discharged at any time during or on the expiry of the period of their probation if they fail to pass the prescribed examinations including the riding test, or are guilty of grave misconduct or are deemed, for sufficient reason, to be unsuitable for service in the police. A probationary inspector shall be discharged by the Inspector-General and all other Upper Subordinates by Range Deputy Inspector-General and Assistant Inspector-General, Government Railway Police, Assistant Inspector-General, Provincial Additional Police (designated as Commandant, Provincial Additional Police) and Assistant Inspector-General of Police (Traffic). No appeal lies against an order of discharge. [Provided that the competent authority may, if it so thinks fit in any case, extend the period of probation by one year in the aggregate and pass such orders at any time during or on the expiry of the extended period of probation as it could have passed during or on the expiry of original period of probation]* (2) *The pay admissible to a probationary Inspector, Sergeant, Sub-Inspector or Assistant Sub-Inspector is shown in A.* PR 12.8 of the Police Rules, 1934, makes it clear that the directly appointed ASI shall be on probation for a period of three years; they would be confirmed only if they have successfully completed the period of probation: without rendering themselves liable to be discharged or period of probation extended for a year by the competent authority for committing any of the misconducts. This rule does not provide that the ASIs appointed direct shall be confirmed from the date of their appointments. This rule provides that such directly recruited ASIs might be confirmed on the successful termination of their period of probation of three years. Where from this interpretation of this rule has popped up? Neither the Tribunal has stated this anywhere in his judgment nor does the petitioner expressly mention this in his petition.
- PR 19.25(5) expressly states that "*on the termination of the prescribed period of probation the Superintendent shall submit to the Deputy Inspector-General for final orders the full report required by Form 19.25(5) on the probationer's working and general conduct, with a recommendation as to whether he should or should not be confirmed in his appointment. In the case of inspectors such reports shall be forwarded to the Inspector-General. The progress and final reports shall be filed with the character rolls of the officers concerned.*" This rule too does not say anything about the date of confirmation. The sentence "as to whether he should or should not be confirmed in his appointment" cannot be construed as commanding the competent authority to confirm them from the date of appointment and it cannot by any principle of interpretation be interpreted to be the "date of appointment." Special attention is drawn to the opening words of this rule which say that "*on the termination of the prescribed period of probation*" the process of their confirmation is kicked in, not before the same. Deputy

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Inspector General of Police (DIGP) is the competent authority to pass the final order of their confirmation, reversion, or extension in the period of probation. This rule does not direct the competent authority to confirm them with retrospective effect. The intention of this rule is to confirm them with immediate effect- the date on which an order of confirmation is passed by the competent authority i.e., "on the termination of the prescribed period of probation."

- Some guidance may also be sought from PR 13.18. It lays down some principles of probation and confirmation of police officers promoted in rank (Rankers), who happen to be respondents in the case in hand. The rule is reproduced as a ready reference: "All Police Officers promoted in rank shall be on probation for two years, provided that the appointing authority may, by a special order in each case, permit periods of officiating service to count towards the period of probation. On the conclusion of the probationary period a report shall be rendered to the authority empowered to confirm the promotion who shall either confirm the officer or revert him. In no case shall the period for probation be extended beyond two years and the confirming authority must arrive at a definite decision within that period whether the officer should be confirmed or reverted. While on probation officers may be reverted without departmental proceedings. Such on probation officers may be reverted without departmental proceedings. Such reversion shall not be considered reduction for the purpose of rule 16.4. This rule shall not apply to constables and Sub-Inspectors promoted to the selection grade, whose case is governed by rules 13.14." This is the only rule which creates an exception to curtail the length of period of probation: it allows an appointing authority to reduce the period of probation of two years in case of police officers promoted in rank by issuing a special order in each case. This exception, too, empowers an appointing authority only to "permit periods of officiating service to count towards the period of probation." Officiating service has been clearly defined in the Police Rules 1934. But it has erroneously been taken as period of probation. Secondly, there is a difference between "officiating rank" and "substantive rank." Promotions on officiating ranks are regulated by PR 13.12 of the Police Rules, 1934, whereas promotions on the substantive ranks are governed in Chapter XIII of the Police Rules, 1934. The two promotions are different by way of their reversions. Reversion from an officiating rank is not a punishment in terms of PR 16.4 the Police Rules, 1934, whereas, in case reversion from a substantive is a punishment in terms of the same. Unfortunately, almost every order of promotion on the substantive rank is perhaps unintendedly declared as a promotion on "officiating higher rank." For instance, most of the orders of promotion on the substantive ranks read as under: "A is hereby promoted from the rank of ASI to "officiating Sub-Inspector." Similar orders of promotion are issued for the promotion of probationer ASIs (directly appointed ASIs). They have almost always unintendedly been promoted to the substantive rank of SIs but have been written as promoted to the rank of officiating SIs. Thus, the two entirely different promotions have been intermingled to some devastating consequences. One of such consequences has been that the practice of testing junior officers on seniors ranks by ways of officiating promotions for a fixed period of time have been completely given up. Therefore, the competent authorities have lost a leverage to test and try junior officers on senior ranks for a specific period on temporary

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vacancies. Juniors have been denied by this ignorance of PR 13.12 to avail an opportunity to experience the requirements of the upcoming senior rank. The second loss caused by this ignorance has been the extinction of the practice of "permitting the counting of period of officiating service towards a period of probation." This is leverage available to competent authorities to reduce period of probation by counting their officiating service towards their period of probation. Instead of counting period on an officiating service towards the period of his probation, the competent authorities have illegally started not only reducing but eliminating the period of probation altogether by confirming ASIs appointed direct in their appointments from the date of their appointments. The exception of "permitting the counting of period of officiating service towards a period of probation" by a competent authority is an exception not a rule and that he has to pass such an order as a special case with reasons to be recorded. Even such an exception cannot be extended arbitrarily across the board to everyone. And above all, it cannot at all be extended to ASIs appointed direct as in their case the period of officiating service does not exist in most of the cases.

- Likewise, PR 12.2(3) of Police Rules 1934 nowhere provides that the petitioner might be assigned seniority from the date on which his name was brought on the promotion List "E" i.e., 27.03.2012. The said rule is hereby reproduced as a ready reference: "Seniority in the case of upper subordinates will be reckoned in the first instance from the date of first appointment, officer promoted from the lower rank being considered senior to persons appointed direct on the same date, and seniority of officers appointed direct on the same date be reckoned according to age. Seniority shall, however, be finally settled by date of confirmation".

7.2.2 It may, therefore, be concluded that a person appointed direct against a permanent post with a definite condition of probation is to be confirmed in the grade with effect from the date on which he successfully completes the period of probation. The decision whether he should be confirmed, or his probation extended should be taken soon after the expiry of the initial probationary period of three years in the case of the petitioner (ASI appointed direct) and of two years in case of the respondents (RANKERS). According to the record available with this office the respondents No. 4 to 16 were appointed as ASIs by way of promotion on the dates mentioned at Column No.6 of the table 7 below, whereas the petitioner and Respondents No. 17 to 21 were appointed by way of the first appointment on the dates mentioned at column 5 of the table below. Column No. 7 of the table reflects the dates of their confirmation on the dates mentioned against each. And their seniority shall be reckoned from the date of their confirmation as ASI given in column No. 7 below: -

Table 7: Table showing the date of first appointment of the Petitioner & the respondents according to the available record.

1	2	3	4	5	6	7
Respondent No.	Seniority No. as per the Promotion List E as it stood on 31.12.2012, issued vide No. 556-62/ES, dated 11.02.2013.	Name & Rank	Date of Birth (DOB)	Date of Appointment (DOA)	Date of Promotion (DOP) as ASI	DOC as ASI
4.	59	Inspector Fazal Raheem No.33/D	10.03.63	02.03.82	01.03.07	01.03.10
5.	60	SI Mumtaz Khan No.104/D (Died)	01.06.65	26.12.87	12.11.07	20.07.10
6.	62	SI Abdullah Khan No.6/D (RTD)	20.07.61	05.04.81	01.03.07	15.06.11
7.	63	SI Allah Nawaz No.7/D (RTD)	18.08.56	07.03.75	14.11.07	15.06.11
8.	64	SI Liaqat Ali No.50/D (RTD)	10.01.59	21.11.78	01.03.07	15.06.11

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9.	65	Inspector Pervaz Hussain, 69/D	15.04.73	11.10.93	01.03.07	09.06.11
10.	66	SI Adam Khan No.78/D (RTD)	09.11.58	18.11.76	01.03.07	15.06.11
11.	67	Inspector Inam Ullah No.98/D	09.01.67	01.07.89	14.05.07	15.06.11
12.	68	SI Abdul Ghani No.107/D (RTD)	01.03.57	21.10.75	16.05.07	15.06.11
13.	69	SI Ghulam Farid No.109/D (RTD)	10.06.60	25.09.80	10.06.07	15.06.11
14.	70	SI Shah Nadir No.110/D (RTD)	10.09.57	14.10.75	16.05.07	15.06.11
15.	71	SI Muhammad Yaqoob No.111/D (RTD)	01.12.56	20.10.75	16.05.07	15.06.11
16.	72	SI Muhammad Ashraf No.112/D (Died)	05.04.60	18.04.78	26.05.07	15.06.11
17.	73	Sub Inspector Ebad Wazir No.	27.01.82	06.04.2009	-	06.04.2012
18.	74	Inspector Minhaj Sikandar	19.08.81	06.04.2009	-	06.04.2012
19.	75	Inspector Kashif Sattar No. 92/D	06.04.85	06.04.2009	-	06.04.2012
20.	76	Inspector Muhammad Adnan No. 91/D	14.04.89	06.04.2009	-	06.04.2012
21.	77	Fazal ur Rehman No. 94-D	02.03.87	06.04.2009	-	06.04.2012
	78	Saleem Pervez No.87/D	01.03.78	06.04.2009	-	06.04.2012

Source: Office record of the offices of DPOs and RPO of the DI Khan Range

7.3 DATE OF BRINGING NAMES ON THE SENIORITY LIST E: What is the Date of Bringing names the Petitioner and the Respondents on the Seniority List E according to the impugned Seniority List E as it stood on 31.12.2013 issued vide No.556-62/ES, dated 11.02.2013; and what ought to be the Date of Bringing names the Petitioner and the Respondents on the Promotion List E according to law?

7.3.1 The Service Tribunal in Service Appeal No Execution Petition No. 223/229-2019 Minhaj Sikandar Yar Khan Vs Police Department has declared it paradoxical to assign seniority to the petitioner from the date on which his name was brought on the promotion List "E" (27.03.2012 – a date different from the date of appointment and that of confirmation and that which falls later than the two former dates by three years). The Tribunal further asserts that "this decision goes against the spirit of Rule 12.2(3) of Police Rules, hence lacks legal backing." While interpreting the said rule the Tribunal concluded that "a plain reading of the said rule would help resolve the controversy deliberately created by the respondents." But, instead of interpreting PR 12.2(3) of Police Rules, 1934 in a manner that it supports the position taken by the Tribunal above, they resorted to cite another judgment of the Tribunal to rely on stating therein that "similar point was also decided by this Tribunal in a judgment dated 07.12.2017 rendered in service appeal no. 573/2016." While skipping the need to examining and interpreting the Rule 12.2(3) of Police Rules 1934, the Tribunal suddenly concluded that "According to this yardstick date of confirmation of the appellant was 19.02.2009, while that of private respondents 20.07.2010 and 2011. For all intent and purposes, they were junior to the appellant. Presumably, private respondents were banking on length of service, which was not the criteria for determination of seniority." In the present order the Service Tribunal has directed to reconsider the case of the petitioner in the light of the judgments of the Supreme Court of Pakistan.

7.3.2 We take this opportunity to make the following SUBMISSIONS to bring forth an interpretation of the relevant rules that is essentially opposed to the one held by the Tribunal:

- a) PR 13.10 provides that, "LIST E. PROMOTION TO SUB-INSPECTOR (1) a list of Assistant-Sub-Inspectors, who have been approved by the Deputy Inspector General as fit for trial in independent charge of a police station, or for specialist posts on the establishment of sub-inspectors, shall be maintained in card index form by each Deputy Inspector General. Officiating promotions of short duration shall ordinarily be made within the district concerned (vide sub-rule 13.4(2), but vacancies of long duration may be filled by the promotion of any eligible man in the Range at the discretion of the Deputy Inspector-General. Half yearly reports on all men entered in the list shall maintained under this rule shall be furnished in Form No. 13.9(3) by the 15th October, in addition to the annual reports to be submitted by the 15th January in accordance with Police Rule 13.17(1). (2) No sub-inspector

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shall be confirmed in a substantive vacancy in the rank of sub-inspector unless he has been tested for at least a year as an officiating sub-inspector in independent charge of a police station in a district other than that in which his home is situated."

- b) PR 13.11 of the Police Rules, 1934 provide that "name of ASIs may be brought on the Promotion List E at any time by Deputy Inspectors-General but all such additions and the removal of all names under sub-rule 13.12(2) shall be published in the Gazette by a special notification. Names shall be entered in the list in order according to the date of admission, length of police service deciding the relative position of Assistant Sub-Inspectors."
- c) PR 13.11 clearly empowers Deputy Inspector General of Police to admit or delete name of any of the eligible ASIs on the Promotion list E at any time after they have met required qualifications for such admission. Direction of the Tribunal to bring the name of the petitioner from the date of confirmation (date of appointment) appears to be inconsistent with the express and unambiguous provision of PR 13.11.
- d) Qualification required for bringing name of an eligible ASI on the Promotion List E have been provided in PR 13.10(2). We would not engage ourselves with the qualification part much as the question in hand is the date on which name of the petitioner is to be brought on the Promotion List E.

7.3.3 Service Appeal No Execution Petition No. 223/229-2019 Minhaj Sikandar Yar Khan Vs Police Department, the petitioner (Respondent No. 18 in the petitioner at hand) attempted to turn the clock back in the case of not only of his dates of appointment and of confirmation but also that of bringing his name on the Promotion list E. Thus, by hiding facts and twisting rules he misled the Tribunal to drive them to declare a date of his own choice as his date of appointment which essentially falls earlier than the date on which he stands appointed by the competent authority. Then, he embarked upon an ambitious project of driving the Tribunal to confirm and promote him the day he was appointed. Thus, all three dates of appointment, confirmation, and promotion in a career of a police officer have been clubbed together to be the one date i.e., date of his appointment by the Tribunal. This appears neither logical nor legally sustainable in the light of PR 12.2(3), 13.1, 13.10, 13.11, 19.25 (5) of the Police Rules, 1934.

7.3.4 Our submissions in the preceding paragraphs have attempted to establish that his date of appointment is 06.04.2009. Secondly, according to the rules quoted above his date of confirmation turns out to be a date after 06.04.2012. Likewise, the date of bringing his name on the Promotion List E could also be possibly any date after he was confirmed in the substantive rank of ASI on the termination of the period of his probation of three years.

7.3.5 The petitioner joined as the Probationer ASI on 06.04.2009- about two years after the date of appointment of Respondents No. 4 to 16 as ASIs by way of promotion of the respondents as according to PR 13.18 of the Police Rules 1934 they were confirmed as ASIs on 01.03.2010. But according to the PR 12.8 and 19.25(5) of the Police Rules 1934, they became eligible to be confirmed after 06.04.2012. This is the date (06.04.2012) after which he could be brought on the List E. Dates of bringing names of the petitioner and that of the respondents are given in column No 8 in the table 8 of the table 8 below. This date (06.04.2012) is not acceptable to the petitioner as the date of confirmation owing to the fundamental reason that by this date (06.04.2012) he had become junior to the respondents No 4 to 16 by almost two years, who stood confirmed as ASIs by the competent authority under PR 13.18 on 01.03.2010 of the Police Rules, 1934: This is the root cause of the long-standing litigation. This leads us to the final question: what the criteria of are determining the seniority of the petitioner and the respondents.

Table 8: Table showing dates of bringing names of the petitioner and the respondents on the Promotion List "E"

1	2	3	4	5	6	7	8
Respondent No.	Seniority No. as per the Promotion List E.	Name & Rank	Date of Birth (DOB)	Date of Appointment (DOA)	Date of Promotion (DOP) as ASI	DOC as ASI	Date of Bringing Name on the

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	as it stood on 31.12.2012, issued vide No. 556-62/ES, dated 11.02.2013						Promotion List "E"
4.	59	Inspector Fazal Raheem No.33/D	10.03.63	02.03.82	01.03.07	01.03.10	15.03.10
5.	60	SI Muntaz Khan No.104/D (Died)	01.06.65	26.12.87	12.11.07	20.07.10	20.07.10
6.	62	SI Abdullah Khan No.6/D (RTD)	20.07.61	05.04.81	01.03.07	15.06.11	15.06.11
7.	63	SI Allah Nawaz No.7/D (RTD)	18.08.56	07.03.75	14.11.07	15.06.11	15.06.11
8.	64	SI Liaqat Ali No.50/D (RTD)	10.01.59	21.11.78	01.03.07	15.06.11	15.06.11
9.	65	Inspector Pervez Hussain, 69/D	15.04.73	11.10.93	01.03.07	09.06.11	15.06.11
10.	66	SI Adam Khan No.78/D (RTD)	09.11.58	18.11.76	01.03.07	15.06.11	15.06.11
11.	67	Inspector Inam Ullah No.98/D	09.01.67	01.07.89	14.05.07	15.06.11	15.06.11
12.	68	SI Abdul Ghani No.107/D (RTD)	01.03.57	21.10.75	16.05.07	15.06.11	15.06.11
13.	69	SI Ghulam Farid No.109/D (RTD)	10.06.60	25.09.80	10.06.07	15.06.11	15.06.11
14.	70	SI Shah Nadir No.110/D (RTD)	10.09.57	14.10.75	16.05.07	15.06.11	15.06.11
15.	71	SI Muhammad Yaqoob No.111/D (RTD)	01.12.56	20.10.75	16.05.07	15.06.11	15.06.11
16.	72	SI Muhammad Ashraf No.112/D (Died)	05.04.60	18.04.78	26.05.07	15.06.11	15.06.11
17.	73	Sub Inspector Ebad Wazir No.	27.01.82	06.04.2009	-	06.04.2012	07.04.2012
18.	74	Inspector Minhaj Sikandar	19.08.81	06.04.2009	-	06.04.2012	07.04.2012
19.	75	Inspector Kashif Sattar No. 92/D	06.04.85	06.04.2009	-	06.04.2012	07.04.2012
20.	76	Inspector Muhammad Adnan No. 91/D	14.04.89	06.04.2009	-	06.04.2012	07.04.2012
21.	77	Fazal ur Rehman No. 94-D	02.03.87	06.04.2009	-	06.04.2012	07.04.2012
	78	Saleem Pervez No.87/D	01.03.78	06.04.2009	-	06.04.2012	07.04.2012

Source: Office record of the offices of DPOs and RPO of the DI Khan Range

7.4 PRINCIPLES OF SENIORITY: which principles of authority have been adopted while placing the names of the Petitioner and the Respondents according to the impugned Seniority List E as it stood on 31.12.2012, issued vide No.556-62/ES, dated 11.02.2013; and what ought to be the principles to be adopted while placing names of the petitioner and the Respondents in the Seniority List and what ought to be the Final Seniority in the light of legal position held in this judgment?

7.4.1 The Tribunal held that, "It is a paradoxical situation, where according to rules, he was *confirmed from the date of appointment* i. e (19.02.2009) (revised order), but seniority assignment from the date of entry in List "E" i.e., 27.03.2012. This decision goes against the spirit of Rule 12.2(3) of Police Rules, hence lacks legal backing. Had this case not been on solid footings/backed by rules, the respondents would not have given him conformation from date of appointment. It further augments the stance of the appellant." (Para 5 of the judgment by the Khyber Pakhtunkhwa Service Tribunal Camp Court DI Khan in Minhaj Sikandar Vs the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and twenty-three others, dated 26.03.2019).

7.4.2 "To illustrate the issue in its true perspective, we would like to seek guidance from Rule 12.2(3) of the Police Rules 1934 "Seniority in the case of upper subordinates will be reckoned in the first instance from the date of first appointment, officer promoted from the lower rank being considered senior to persons appointed direct on the same date and seniority of officers appointed direct on the same date be reckoned according to age. Seniority shall, however, be finally settled by date of confirmation". A plain reading of the said rule would help resolve the controversy deliberately created by the respondents." "Similar point was also decided by this Tribunal in judgment dated 07.12.2017 rendered in service appeal no. 573/2016. Despite knowledge rules were misinterpreted with mal intent just to deprive the appellant of his due right. According to this yardstick date of confirmation of the appellant was 19.02.2009, while that of private respondents 20.07.2010 and 2011. For all intent and purposes, they were junior to the appellant. Presumably, private respondents were banking on length of service, which was not the criteria for determination seniority. The appellant has succeeded in making out a strong case of discriminatory treatment received by him from the respondents in violation of Article 25 of the

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Constitution. Similar point was decided by the Supreme Court (AJ&K) through 1999 PLC (CS) 349 and 1999 SCMR 1185.” (Para 7 & 8 of the judgment by the Khyber Pakhtunkhwa Service Tribunal Camp Court DI Khan in Minhaj Sikandar Vs the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and twenty-three others, dated 26.03.2019). As a sequel to above, the appeal is accepted, and impugned seniority list dated 12.03.2014 is set aside. Respondents are directed to assign seniority to the appellant from the due date.” (Para 9 of the judgment by the Khyber Pakhtunkhwa Service Tribunal Camp Court DI Khan in Minhaj Sikandar Vs the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and twenty-three others, dated 26.03.2019).”

7.4.3 While hearing the execution petition No. 223/229-2019 Minhaj Sikandar vs PPO KP etc., the Tribunal held on 23.11.2021 that “it has become expedient to draw parameters for the expression “due date” as used in operative part of the judgment dated 26.03.2019 for its execution in letter and spirit.” “It is a matter of rule that the confirmation of the petitioner on the part of ASI of police being direct appointee was to be reckoned from the date of his appointment made on 19.02.2009, on completion of prescribed probation period, but due to its having been reckoned otherwise with adverse effect on appellant’s seniority, service dispute arose compelling him to invoke the jurisdiction of this Tribunal. The direction given in the judgement under execution to assign seniority to the petitioner from due date is not divertible to reckon any other date of his confirmation than the date of appointment after completion of probation period as PASI.”

7.4.4 The present petitioner has also prayed that he may be declared as senior to the Respondents No. 4 to 16 and then he may be declared as senior to the Respondents No. 17 to 21 on the principle of age. The perusal of the record and the arguments floated above it is concluded. at that the petitioner is hereby declared as junior to Respondents No. 4 to 16 and senior to Respondents No 17 to 21 on the basis of the following arguments:

- a) PR 12.2 (3) Seniority and Probation lays down the principles to determine seniority of upper subordinates. PR 12.2 is hereby reproduced as a ready reference: “Seniority in the case of upper subordinates will be reckoned in the first instance from the date of first appointment. Officer promoted from the lower rank being considered senior to persons appointed direct on the same date, seniority of officers appointed direct on the same date be reckoned according to age. Seniority shall, however, be finally settled by dates of confirmation, the seniority inter se of several officers confirmed on the same date being that allotted to them on first appointment: provided that any officer whose promotion or confirmation is delayed by reason of his being on deputation outside his range or district, shall on being promoted or confirmed, regain the seniority which he originally held vis-à-vis any officers promoted or confirmed before him during his deputation.”
- b) Supreme Court of Pakistan held in Inspector-General Of Police, Punjab, Lahore Versus Mushtaq Ahmad Warraich, Supreme Court 1985 PLD 159, that “Rule 12.2 of the Punjab Police Rules, 1934, will provide the criterion for determining the seniority of the subordinate ranks of the Police force as from the dates of their confirmation and not from the dates of continuous appointment in the grade as laid down in rule 8(1)(b) of the Punjab Civil Servants (Appointment and Conditions of Service) Rules, 1974 read with section 7(2) of the Punjab Civil Servants Act, 1974.” (ANNEX O)
- c) It is now crystal clear that the provisions of PR 12.2 of the Police Rules, 1934, govern the matters relating to the seniority of the upper subordinates. Under PR 1.13 of the Police Rules, 1934, “the expression “upper subordinates” includes all enrolled officers of and above the rank of Assistant Sub-Inspector.” Thus, the PR 12.2 relates to the petitioner and the respondents.
- d) The Supreme Court of Pakistan, while interpreting the PR 12.2 has made it clear that “Rule 12.2 of the Punjab Police Rules, 1934, will provide the criterion for determining the seniority of the subordinate ranks of the Police force as from the dates of their confirmation.”
- e) The date of confirmation of the petitioner and the respondents, therefore, assumes the paramount importance. The issue of date of confirmation has been submitted in detail in the paragraphs under 7.2 at length. In the light of the submissions made above, it may be stated that it would be illegal to interpret the due date of the confirmation of

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- the petitioner as a date to be reckoned as his date of appointment in true letter and spirit of PRs 12.2(3), 12.8, 13.18, 19.25(5) of the Police Rules, 1934.
- f) As has been submitted under paragraphs 7.1 above, the **date of appointment** of the petitioner is in fact 06.04.2009. No other date of appointment is admissible in law.
 - g) Likewise, under PRs 12.2(3), 12.8, 13.18, 19.25(5) of the Police Rules, 1934, as explained under paragraphs 7.2 above, his **date of confirmation** becomes due on 06.04.2012. This is the date on which the period of his probation terminates. Deputy Inspector General of Police of the Range is empowered to confirm him in his appointment on the recommendation of the concerned DPO. This process takes some time. Even if it is assumed that he will be liable to be confirmed on the date the period of probation of three years terminates, he cannot be confirmed a day before 06.04.2012.
 - h) Similarly, under PRs 13.10 & 13.11 of the Police Rules, 1934 and in the light of submissions made under paragraphs 7.3, the date of **bringing his name on the Promotion List E** might fall *any time* after 06.04.2012, not before this date by any stretch of any principle of interpretation of the rules on the subject.
 - i) Under the light of these submissions, we may conclude that the petitioner is junior to the respondents who were appointed as ASI by way of promotion on 01.03.2007. Under PR 13.18 of the Police Rules, 1934, they were supposed to be confirmed on the termination of period of their probation for two years on or after 01.03.2009. According to the record available, reflected on the Table 8 above, they were confirmed in the rank of ASI on 01.03.10, 09.06.11 & 15.06.11. Under PR 12.2(3) of the Police Rules, 1934, as interpreted above, the respondents are senior to him, and he is junior to them as his period of probation terminated on 06.04.2012- almost a year after the respondents stood confirmed in their ranks on the dates 01.03.10, 09.06.11 & 15.06.11, respectively.
 - j) He is, however, declared a senior to the Respondents No 17 to 21 because he is senior in age. Dates of their appointment are given in column No. 4 of the Table 8 above.
 - k) The final seniority position of the petitioner and the respondents is provided in the Table 9 below in the light of submissions made above.

Table 9: Final seniority position of the petitioner and the Respondents

1	2	3	4	5	6	7	8
Respondent No.	Seniority No. as per the Promotion List E as it stood on 31.12.2013, issued vide No. 556-62/ES, dated 11.02.2013.	Name & Rank	Date of Birth (DOB)	Date Appointment (DOA)	Date of Promotion (DOP) as ASI	DOC as ASI	Date of Bringing Name on the Promotion List "E"
4.	59	Inspector Fazal Raheem No.33/D	10.03.63	02.03.82	01.03.07	01.03.10	15.03.10
5.	60	SI Muntaz Khan No.104/D (Died)	01.06.65	26.12.87	12.11.07	20.07.10	20.07.10
6.	62	SI Abdullah Khan No.6/D (RTD)	20.07.61	05.04.81	01.03.07	15.06.11	15.06.11
7.	63	SI Allah Nawaz No.7/D (RTD)	18.08.56	07.03.75	14.11.07	15.06.11	15.06.11
8.	64	SI Liaqat Ali No.50/D (RTD)	10.01.59	21.11.78	01.03.07	15.06.11	15.06.11
9.	65	Inspector Pervaz Hussain, 69/D	15.04.73	11.10.93	01.03.07	09.06.11	15.06.11
10.	66	SI Adam Khan No 78/D (RTD)	09.11.58	18.11.76	01.03.07	15.06.11	15.06.11
11.	67	Inspector Inam Ullah No.98/D	09.01.67	01.07.89	14.05.07	15.06.11	15.06.11
12.	68	SI Abdul Ghani No.107/D (RTD)	01.03.57	21.10.75	16.05.07	15.06.11	15.06.11
13.	69	SI Chulam Farid No.109/D (RTD)	10.06.60	25.09.80	10.06.07	15.06.11	15.06.11
14.	70	SI Shah Nadir No.110/D (RTD)	10.09.57	14.10.75	16.05.07	15.06.11	15.06.11

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Service Appaal No. 1156/2013 (Saleem Pervez Vs Govt. of KP Petition No. 223/229-2019 Minhaj Sikandar-Yar Khan Vs Police Department)

15.	71	SI Muhammad Yaqoob No.111/D (RTD)	01.12.56	20.10.75	16.05.07	15.06.11	15.06.11
16.	72	SI Muhammad Ashraf No.112/D (Died)	05.04.60	18.04.78	26.05.07	15.06.11	15.06.11
	73	Saleem Pervez No.87/D	01.03.78	06.04.2009	-	06.04.2012	07.04.2012
17.	74	Sub Inspector Ebad Wazir No.	27.01.82	06.04.2009	-	06.04.2012	07.04.2012
18.	75	Inspector Minhaj Sikandar	19.08.81	06.04.2009	-	06.04.2012	07.04.2012
19.	76	Inspector Kashif Sattar No. 92/D	06.04.85	06.04.2009	-	06.04.2012	07.04.2012
20.	77	Inspector Muhammad Adnan No. 91/D	14.04.89	06.04.2009	-	06.04.2012	07.04.2012
21.	78	Fazal ur Rehman No. 94-D	02.03.87	06.04.2009	-	06.04.2012	07.04.2012

8. At the end, It is, therefore, humbly prayed that keeping in view the submissions made at para 7 above all the following orders of appointment of the petitioner may be declared as null and void ab intio as they were based on flying assumptions and intended to turn the clock back without the authority of law,

- 9.1.1 DPO DI Khan vide No. 4707-09/, dated 30.04.2009, declaring him appointed w.e.f. 07.03.2009 (ANNEX K)- the date on which they were sent for medical examination- and
- 9.1.2 DPO DI Khan vide NO. 9195-97/dated 21.05.2012 (ANNEX L)- revising his date of appointment from 07.03.2009 to 14.04.2009, issued after the original order of his appointment issued by the DIG DI Khan vide his Order No. 1162-63/ES, dated 06.04.2009 (ANNEX J).
- 9.1.3 List "E" as it stood on 31.12.2012, Issued by DIG DI Khan, vide No. 556-62/ES, dated 11.02.2013 (ANNEX M), which shows that the date of his appointment was 07.03.2009.
- 9.1.4 List "E" as it stood on 31.12.2013, Issued by DIG DI Khan, vide No. 883-89/ES, dated 12.03.2014 (ANNEX N), which shows that the date of his appointment was 19.02.2009.

9.2 It is prayed that the **date of confirmation** of the petitioner may be decreed to be reckoned from the date on which terminates the prescribed period of probation of the probationer and that of the respondents and NOT from any other date that falls before the termination of this period of probation. It is also prayed that reckoning of date of confirmation from the date of appointment in the case of petitioner and of all those ASIs appointed direct may be decreed to be illegal as has been provided in PR 12.8 and 19.25(5) of the Police Rules, 1934. Since it has been established that the date of appointment of the petitioner is 06.04.2009, the prescribed period of probation for three years of the petitioner may be decreed to be reckoned from 06.04.2009 NOT from any other date of appointment.

9.3 It is further prayed that a direction may be passed to the effect that the petitioner and all those ASIs who, have been or may be appointed direct, by way of competitive examination, conducted by the Khyber Pakhtunkhwa (N.W.F.P) Public Service Commission, may be confirmed in their appointment *on the termination of the prescribed period of probation of three years and that such termination would not take effect retrospectively from the date of appointment of the petitioner and that of such ASIs but with effect from the date that falls after the date of termination of the period of probation for three years provided that they successfully complete such period of probation without being reverted or granted extension in the period of probation as has been intended by the PR 12.8 and 19.25(5) of the Police Rules, 1934.*

9.4 It is further prayed that the direction to set aside the impugned seniority list "E" dated 12.03.2014, as it stood on 31.12.2013, issued by DIG DI Khan, vide No. 883-89/ES, dated 12.03.2014 (ANNEX N), whereby he was brought on the impugned List E w.e.f. 20.02.2012, may be reviewed and amended for the reasons recorded under sub- paragraphs of para 7 above.

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- 9.5 It may also be decreed that the principle under which his name was brought on the impugned List E was correct. The principle stated that his name might be brought on the Promotion List E by the competent authority *at any time* after his confirmation on the termination of the prescribed period of probation for three years.
- 9.6 But the date of appointment from which his period of probation for three years was reckoned does not exist on record as has been submitted under sub-paragraphs of the para 7 above. According to record his legal date of appointment is 06.04.2009 vide No. 1164-65/ES, dated 06.04.2009 (ANNEX H). His period of probation of three years was supposed to be reckoned from this date i.e., 06.04.2009 not from 19.02.2009 as the latter does neither exist nor stands issued by any of the competent authorities.
- 9.7 It is, therefore, prayed further that it may be decreed that an inward diary number of the office of the DIG DI Khan cannot be declared as the date of appointment of the petitioner and that of any other police officer. It is further prayed that it may be decreed that an endorsement for medical examination can also not be declared as the date of appointment of the petitioner. For the reasons recorded at para 5, it may be decreed that neither 19.02.2009 nor 07.03.2009 were the dates of appointment of the petitioner, his date of appointment notified by the competent authority was 06.04.2009.
- 9.8 It is further prayed that the seniority List "E" as it stood on 31.12.2012, at present (ANNEX P), may be set aside and the seniority list "E" prepared afresh in the light of Table No. 9 above and may be decreed to be legal and valid. Such seniority List E is **Annexed herewith.**



(SHAUKAT ABBAS)

PSP

Regional Police Officer,
Dera Ismail Khan Region

BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1156/2013

Saleem PervaizVs..... IGP KP etc

AFFIDAVIT

I Khalil Ahmad Inspector Legal solemnly affirms and declares on oath that the contents, of Comments/Written reply to writ Petition are true & correct to the best of my knowledge & belief and nothing has been concealed from this Honourable Tribunal.

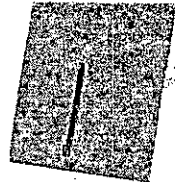


A handwritten signature of the deponent, Khalil Ahmad, written in black ink.

DEPONENT

12101-1306307-7

DER



Consequent on the recommendation of NWFP Public Service Commission and approved by PPO NWFP Peshawar vide letter No.3867-73/E-II dated 12.2.2009 and No.5687-91/E-II dated 28.2.2009 against the 25% quota reserved for direct appointment. The following candidates have been approved for appointment as Probation ASIs in Police Department on three years probation in BPS-09 (3820-230-10720) alongwith usual admissible allowances from the date of their arrival in the District subject to the medical fitness and character verification.

They are allotted Range Number and posted to the Districts as noted against their name: -

S #	Name with address	Range Number Allotted	District to which Posted
1	Salim Pervez s/o Ghulam Qasim r/o Street No.1 new Abbadi near Tarin Colony Mohallah Ghari Saduzai Tank road D.I.Khan	87/D	D.I.Khan
2	Minhaj Sikandar Yar Khan s/o Sikandar Yar Khan r/o Yar House, Yar Street Bannu road D.I.Khan	88/D	D.I.Khan
3	Ebaad Wazir s/o Abdul Wahid r/o House No.28 Street I Sector I, Phase-III Hayatabad Peshawar	89/D	D.I.Khan
4	Inamullah s/o Attaullah r/o Atta House near Faqimi gate Circular road D.I.Khan	90/D	Tank

(DR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,
Dera Ismail Khan

No. 1164-65 /ES Dated D.I.Khan the 6 /04/2009

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

- | | |
|---------------------------------------|--|
| 1. District Police Officer, Tank. | Necessary gazette notification may be issued accordingly |
| 2. District Police Officer, D.I.Khan. | |

Their application forms received from CPO NWFP Peshawar are sent herewith.

(DR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,

- From : The Provincial Police Officer,
NWFP, Peshawar.
- To 1. The Capital City Police Officer,
Peshawar.
2. The Deputy Inspector General of Police,
Mardan Region-I, Mardan.
3. The Deputy Inspector General of Police,
Malakand Region-III, Swat
4. The Deputy Inspector General of Police,
Kohat Region.
5. The Deputy Inspector General of Police,
Bannu Region.
6. The Deputy Inspector General of Police,
D.I.Khan Region.
7. The Deputy Inspector General of Police,
Hazara Region Abbottabad.

4/6
17-11-09

No. 3867-73/E-II, Dated Peshawar the 12/12/2009.

Subject: RECRUITMENT OF 76 ASIs (BPS-09) IN PROVINCIAL POLICE DEPARTMENT (FRESH CANDIDATES) ADVT. NO. 01/2007.

Memo.

Consequent upon recommendation of NWFP Public Service Commission Peshawar vide letter NWFP-PSC (ASI)-Interview 2009/05195 dated: 04.02.2009, the appointment of the following candidates are hereby approved as Assistant Sub Inspectors BPS-09 (3820-230-10720) against the 25% quota reserved for direct appointment in Police Department, vide Govt of NWFP Home & T.As Department, letter No. (Police) HD/03-22/2000 dated: 17.10.2003:-

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12/12/09

S/No	Name & Parentage	Address
1.	Syed Khalid Shah s/o Syed Yaqoub Shah	On side Yakka foot Zang, Alge Chowk District Peshawar.
2.	Irfan s/o Sher Afzal	Village Kotla Kholm Khan Moh. Mankazy District Peshawar
3.	Nacem Haider Khan s/o Ghulam Haider Khan.	Ghani Atta Muhammad Doh Bahadar Kohat Road Peshawar
4.	Faisal Rehman s/o Gulam Jan	H.No. 1519 Moh. Ghani Mir Zaman Shah Haka Daberi Peshawar
5.	Khalid Anwar s/o Abdul Malik Khan.	H.No. 407, Sect. No. 02 Phase No 04 Hayatabad Peshawar
6.	Ahmad Rashid s/o Abdul Rashed Arif	H.No. 305 Moh. Pir Gulab Shah The Hinge Peshawar
7.	Inam Alam Khan Khalid s/o Mawaz Alam Khan Khalid.	H.No. 174 St. No. 6 Canal Town Swan Bagh Road Peshawar
8.	Sajjad Ahmad Khan s/o Anwar Ullah Jan	Village Opaza Bala P.O. Malakand District Peshawar
9.	Muhammad Abid Afridi s/o Malik Muhammad Akbar Afridi	Azam Service Station old Bara Swan Bara Tehsil Khyber Agency
10.	Shakir Ullah s/o Sharaf Hassan	Paigani Road Pukh Pul Hapi Shad Khan Qilla P.O. Fajr Abad District Peshawar
11.	Awal Sher Khan s/o Nadir Sher	Village Kala Khol Moh. Baba Khol P.O. Mastan District Peshawar
	Shahid Khan s/o Sadru Khan	Room No. 115, House No. 1 Near H-02 Engineering University, Peshawar.
	Ab Khan s/o Abdul Shakoor	Village Gaji Kali P.O. Baghulada District Mardan
	Fawad s/o Syed Abdur Rehman	20 D, Police Housing Colony, Khasi Bagh Road, Peshawar
	Ali s/o Hazrat Gul	District & Tehsil Swabi P.O. Charbagh Village, Malak Abad.

16.	Bahar Ali s/o Ayub Khan	Village Manabdar District Swabi P/O Kernal Sher Kili.
17.	Murtaza Ali s/o Mohammad Ayub Sant.	Village Agota Sharif P/O Kernal Sher Kili District Swabi.
18.	Abdul Baseer s/o Abdul Maroof	Moh. Punama Bazar Village & P/O Lardher Tehsil Lardher District Swabi
19.	Hafeez ur Rehman s/o Kandar Khan	Village Wazir Gahri P/O Pabbi District Nowshera.
20.	Akhtar Naseer s/o Naseer ud Din	Village & P/O Azakhel Baba, Moh. Wazir Abad District Nowshera
21.	Inam Ullah s/o Jamshid	Moh. Godam Korona, Village & Post Office Kheshti Payan, Tehsil & District Nowshera
22.	Fazal Malik s/o Fazal Hamid	Village Bahid Abad P/O Sakhat District Malakand Tehsil Dargai.
23.	Muhammad Ali s/o Haji Faranooz Khan	Stadium Road Chinar Kalony Amankot District Swat.
24.	Akhtar Ali s/o Khureshid Ab	Village Bana Bana Khela Tehsil & P/O Malat District Swat.
25.	Kaleem Ullah s/o Liaqat Ali	Village Kot P/O Box Chahbagh District Swat NWFP
26.	Aziz ur Rehman s/o Ihsan Ullah	Village Kabadher P/O Balogram Tehsil Babozar, District Swat (NWFP)
27.	Mukaram Shah s/o Ahmad Shah	Village Basoon P/O Rabat Tehsil Talab District Dn Lower
28.	Imad ud Din s/o Jamal ud Din	House No. 15 C2 Street No. 10 Phase 5 Hayatabad Peshawar.
29.	Muhammad Arshad Khan s/o Din Muhammad	Mansoor Abad Village & P/O Kinal District Dn Lower.
30.	Miraj Muhammad s/o Badshah Muhammad	House No. 190, Phase-II, Sector 11 Street No. 6 Hayatabad Peshawar
31.	Wajid Shah s/o Rashid Khan	Officer Block 19-A Gulshan Rehman Colony Kohat Road Peshawar.
32.	Anjad Iqbal s/o Abdul Latif Khan	C/O Admin Officer NWFP Agricultural University Peshawar
33.	Basharat Ahmad s/o Zulfikar Sher	District Chitral Tehsil Torkow P/O Reeh Village Reeh.
34.	Khalil ur Rehman s/o Muhammad Sheraz	Village Parwak Tehsil Mustaj District Chitral
35.	Ijaz Anwar s/o Aurang Zeb	H. No. 101 Sreet No. 10, Sector 1.2, Phase-2 Hayatabad Peshawar.
36.	Farrukh Sair s/o Mumber Khan	Village Sultanwas Post Office PIR Baba Tehsil Dargai District Buner
37.	Khalid Khan s/o Ihtikhar Hussain	H/No. K-4, 8/Phase, 3 Hayatabad Peshawar
38.	Zahid Ullah s/o Rukn Din	Village Lass Gahri Bostri Khel P/O Darna Bazar FR Kohat.
39.	Zeeshan Ahmed s/o Kifayat Ullah Khan	Moh. Kot Dugh District Hangu.
40.	Fazal Muhammad s/o Ahmad Khan	Village & P/O Sarozai, District Hangu
41.	Abbas Ali s/o Liaqat Ali	Karam Jan General Store Fajfafa Bazar Parghina Kurram Agency
42.	Rizwan Ullah s/o Shah Niaz Khan	Village & P/O Bazar Ahmad Khan Bannu near Union named Bazar Ahmad
43.	Aman Ullah Khan s/o Muhammad Sher Khan	Village Asola Khehen Khel P/O Ghoriwala District Bannu
44.	Nasir Ullah Khan s/o Muhammad Iqbal	Village Shalbari P/O Bharat District Bannu
45.	Imran Ullah Khan s/o Muhammad Aslam Khan	Tanchi Abad Serai Nourang, St. Haji Zairwala Khan Khatrak District Lakki Mawwat
46.	Saleem Parvez s/o Ghulam Qasim	St. No. 1874 Abadi Near Larden colony Mohb. Gahri Saddozai Village Kotar Tank Road District D.K.Khan
47.	Munhaj Sikandar Yar Khan s/o Sikandar Yar Khan	Var House, Yar Street Bannu Road D.K.Khan
48.	Ehsad Wazir s/o Abdul Wabid	House No. 28 Street No. 1 Sector 1.2, Phase II, Hayatabad Peshawar
49.	Noor Rehman s/o Abdur Rehman	Chhara Zer-Sar Tehsil Malakand South Waziristan Agency.
50.	Ihsanullah s/o Rehman Ullah	Village Khaddi, Tehsil Mirali C/O Miralam Book Seiter Main Bazar Mir Ali Adka, N.W.A
51.	Muhammad Munir Khan s/o Ghulam Muhammad	Moh. Chowki Village Sami Khairabad, P/O Khan Abad Tehsil, Balakot District Muzshera
52.	Muhammad Arif Khan s/o Muhammad Banaras Khan	Village Hussainan P/O Qalandan Abad District & Tehsil Muzshera
53.	Sadaqat Nisar s/o Nisar Muhammad Khan	Moh. Jafal Abad, Dal No. 1 District Muzshera
54.	Zulfikar Ali s/o Zardad Khan	Village & P/O Bodla Via Hayefian District Abbottabad.

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55.	Inam ul Haq s/o Muhammad Ashraf	Village Gehial Qazam P/O Raif District Abbottabad
56.	Junaid Irshad s/o Irshad Hussain	H No 10 1332 Moh. Mossazi Nawastier (A.T.D) Abbottabad
57.	Muhammad Uzair s/o Muhammad Akram	Village Shah Maqsood P/O Saad-e-Saleh District Haripur
58.	Bashir Ahmad s/o Sikandar Khan	Village & P/O Nartopa District Haripur
59.	Muhammad Sajid Farooq s/o Gohar Rehman	H.No.1482 Sect. No.01 Kalabat Town Ship District Haripur
60.	Tufail Muhammad s/o Muhammad Ghaffar Khan	Village Chappar Gram District Battagram Hazara
61.	Abdul Ghafoor s/o Muhammad Sabir Khan	Village Khoshi Tehsil Dasso District Kohistan
62.	Abdul Saitar Khan s/o Sharif Khan	Village Sher Kot Tehsil Paka District Kohistan
63.	Muhammad Raza Khan s/o Taj Ali Khan	Sugara Muhammad Khan P/O Ejori District Lakki Marwat

On appointment they are posted/allotted to the Region/District as noted against their names:-

S/NO	NAME	Region/District
1.	Syed Khalid Shah	CCP Peshawar/Peshawar
2.	Irfan	CCP Peshawar/Peshawar
3.	Naeem Haider Khan	CCP Peshawar/Peshawar
4.	Faisal Rehman	CCP Peshawar/Peshawar
5.	Khalid Anwar	CCP Peshawar/Peshawar
6.	Ahmad Rashid	CCP Peshawar/Peshawar
7.	Imran Alam Khan Khalil	CCP Peshawar/Peshawar
8.	Sajjad Ahmad Khan	CCP Peshawar/Peshawar
9.	Muhammad Abid Afridi	CCP Peshawar/Peshawar
10.	Shakir Ullah	CCP Peshawar/Peshawar
11.	Awal Sher Khan	CCP Peshawar/Peshawar
12.	Shahid Khan	CCP Peshawar/Peshawar
13.	Ajab Khan	Mardan Region/Mardan District
14.	Mohsin Fawad	Mardan Region/Mardan District
15.	Gouhar Ali	Mardan Region/Mardan District
16.	Bahar Ali	Mardan Region/Swabi District
17.	Murtaza Ali	Mardan Region/Swabi District
18.	Abdul Baseer	Mardan Region/Swabi District
19.	Hafeez ur Rehman	Mardan Region/Swabi District
20.	Akhtar Naseer	CCP Peshawar/Nowshera District
21.	Inam Ullah	CCP Peshawar/Nowshera District
22.	Fazal Malik	CCP Peshawar/Nowshera District
23.	Muhammad Ali	Malakand Region/Swat District
24.	Akhtar Ali	Malakand Region/Swat District
25.	Kaleem Ullah	Malakand Region/Swat District
26.	Aziz ur Rehman	Malakand Region/Swat District
27.	Mukaram Shah	Malakand Region/Swat District
28.	Imad ud Din	Malakand Region/Dir Lower District
29.	Muhammad Arshad Khan	Malakand Region/Dir Lower District
30.	Miraj Muhammad	Malakand Region/Dir Lower District
31.	Wajid Shah	Malakand Region/Dir Upper District
32.	Amjad Iqbal	Malakand Region/Dir Upper District
33.	Basharat Ahmad	Malakand Region/Shangla District
34.	Khalid ur Rehman	Malakand Region/Chitral District
35.	Ijaz Anwar	Malakand Region/Chitral District
36.	Farrukh Sair	Malakand Region/Buner District
37.	Khalid Khan	Malakand Region/Buner District
38.	Zahid Ullah	Malakand Region/Buner District
39.	Zeeshan Ahmed	Kohat Region/Kohat District
40.	Fazal Muhammad	Kohat Region/Hangu District
41.	Abbas Ali	Kohat Region/Hangu District

42.	Rizwan Ullah	Bannu Region/Bannu District
43.	Aman Ullah Khan	Bannu Region/Bannu District
44.	Nasir Ullah Khan	Bannu Region/Bannu District
45.	Imran Ullah Khan	Bannu Region/Lakki Marwat
46.	Saleem Parvez ✓	DIKhan Region/DIKhan District ✓
47.	Minhaj Sikandar Yar Khan ✓	DIKhan Region/DIKhan District ✓
48.	Ehsad Wazir ✓	DIKhan Region/DIKhan District ✓
49.	Noor Rehman ✓	DIKhan Region/DIKhan District ✓
50.	Ihsanullah ✓	DIKhan Region/DIKhan District ✓
51.	Muhammad Munir Khan	Hazara Region/Manshera District
52.	Muhammad Arif Khan	Hazara Region/Manshera District
53.	Sadaqat Nisar	Hazara Region/Manshera District
54.	Zulfiqar Ali	Hazara Region/Abbottabad District
55.	Inam ul Haq	Hazara Region/Abbottabad District
56.	Jumad Irshad	Hazara Region/Abbottabad District
57.	Muhammad Uzair	Hazara Region/Hatapur District
58.	Bashir Ahmad	Hazara Region/Hatapur District
59.	Muhammad Sajid Farooq	Hazara Region/Hatapur District
60.	Tufail Muhammad	Hazara Region/Battagram District
61.	Abdul Ghafoor	Hazara Region/Kohistan District
62.	Abdul Sattar Khan	Hazara Region/Kohistan District
63.	Muhammad Raza Khan	Bannu Region/Lakki Marwat

Necessary Notification regarding their appointment may please be issued subject to Medical Test under the relevant rules and prescribed manner under intimation to all concerned. Their applications together other relevant documents are also sent herewith for placing in their Character Roll/ Service Roll.

For complete document - 5
Encl. attached to the cover sheet

MALIK NAVEED KHAN
 PROVINCIAL POLICE OFFICER,
 NWFP, PESHAWAR.
 1 / 2009.

No. _____ /E-II, Dated Peshawar the _____ / 2009.

Copy of above is forwarded for information and necessary action to Mr. Amir Kalam Shah, Director Examination, NWFP, Public Service Commission, 2-Fort Road Peshawar Cantt. w/r to his letter No NWFP PSC (ASD)-Interview 2009. 05195 dated 04.02.2009.

For info

[Handwritten signature]

For information General of Police
20.1.2009, Peshawar

(ABDUL MAJEED KHAN MARWAT)
 P.S.P.
 DIG/Headquarters,
 For Provincial Police Officer,
 NWFP, Peshawar.

From Provincial Police Officer,
NWFP, Peshawar.

- To 1. The Capital City Police Officer, Peshawar.
- 2. The Deputy Inspector General of Police, Mardan Region-I, Mardan.
- 3. The Deputy Inspector General of Police, Malakand Region-III, Swat.
- 4. The Deputy Inspector General of Police, Kohat Region.
- 5. The Deputy Inspector General of Police, Bannu Region.
- 6. The Deputy Inspector General of Police, D.I.Khan Region
- 7. The Deputy Inspector General of Police, Hazara Region Abbottabad.

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19-2-09

No. 3867-73 /B-II, Dated Peshawar the 12/2/2009.

Subject: RECRUITMENT OF 76 ASIs (BPS-09) IN PROVINCIAL POLICE DEPARTMENT (FRESH CANDIDATES) ADVT. NO. 01/2007)

Memo.

Consequent upon recommendation of NWFP Public Service Commission Peshawar vide letter NWFP-PSC (ASD)-Interview 2009/05195 dated: 04.02.2009, the appointment of the following candidates are hereby approved as Assistant Sub Inspectors BPS-09 (3820-230-10720) against the 25% quota reserved for direct appointment in Police Department, vide Govt. of NWFP Home & F.As Department letter No. (Police) HD/03-22/2000 dated: 17.10.2003:-

S/No	Name & Parentage	Address
1.	Syed Khalid Shah s/o Syed Yaqoub Shah	Out side Yukka Toot Zenger Abge Chowk District Peshawar.
2.	Irfan s/o Sher Afzal	Village Loda Mohan Khan Mohr Malakzy District Peshawar
3.	Naeem Haider Khan s/o Ghulam Haider Khan.	Ghani Atta Muhammad Deh Bahadar Fohar Road Peshawar
4.	Faisal Rehman s/o Gula Jan	H.No. 1319 Mohr Ghani Mir Zamin Shahi Bhaq Dabani Peshawar
5.	Khalid Anwar s/o Abdul Malik Khan	H.No. 107, Secr. No. 02 Phase No. 04 Hvatabad Peshawar
6.	Ahmad Rashid s/o Abdul Rashed Arif	H.No. 205 Mohr Pir Gulab Shahi, Haidtangi Peshawar
7.	Inam Alam Khan Khalil s/o Mawaz Alam Khan Khalil.	H.No. 1711 Str. No. 6 Canal Town Nagar Bagh Road Peshawar
8.	Sajjad Ahmad Khan s/o Amin Ullah Jan	Village Opazi Bala P/O Malana District Peshawar
9.	Muhammad Abid Afridi s/o Malik Muhammad Akbar Afridi	Azam Service Station old Bara Bara Bara Tehsil Khyber Agency
10.	Shakir Ullah s/o Sharaf Hassan	Panaggi Road Pukh Pol Baji Shah Khan Qila P/O Faqir Abad District Peshawar
11.	Awal Sher Khan s/o Nadir Sher	Village Kala Khel Mohr Babar Khel P/O Malana District Peshawar
	Shahid Khan s/o Sadbar Khan	Room No. 135 House No. 3 New Block Engineering University, Peshawar
	ab Khan s/o Abdul Shakoor	Village Baji Kati P/O Bagholada District Mardan
	in Fawad s/o Syed Abdur Rehman	20 D, Police Housing Colony, Nasti Bagh Road, Peshawar
	Ali s/o Hazrat Gul	District & Tehsil Swabi P/O Charbagh Village Kadal, Abad.

Handwritten initials and date: 12/2/09

16.	Bahar Ali s/o Ayub Khan	Village Mansabdar District Swabi P/O Karam Sher Khan.
17.	Murtaza Ali s/o Mohammad Ayub Sami.	Village A. J. Shaif P/O Karam Sher Khan District Swabi.
18.	Abdul Baseer s/o Abdul Maroof	Moh. Pucana Bazar Village & P/O Fardher Tehsil Labor District Swabi.
19.	Halfeez ur Rehman s/o Kandar Khan	Village Wazir Garhi P/O Pabbi District Nowshera.
20.	Akhtar Naseer s/o Naseer ud Din	Village & P/O Ayakhel Baba, Moh. Wazir Abad District Nowshera.
21.	Inam Ullah s/o Jamshid	Moh. Godam Goroona, Village & Post Office Kheshga Payan, Tehsil & District Nowshera.
22.	Fazal Malik s/o Fazal Hamid	Village Taidid Abad P/O Sakhat District Malakand Tehsil Dargai.
23.	Muhammad Ali s/o Haji Faranoz Khan	Stadium Road Chinar Kadony Anantkot District Swat.
24.	Akhtar Ali s/o Khurshid Ali	Village Bara Bana Khela Tehsil & P/O Manta District Swat.
25.	Kaleem Ullah s/o Liaqat Ali	Village Kot P/O Box Charbagh District Swat NWFP.
26.	Aziz ur Rehman s/o Ihsan Ullah	Village Kubadher P/O Balogram Tehsil Babozai District Swat (NWFP).
27.	Mukaram Shah s/o Ahmad Shah	Village Basoon P/O Rabat Tehsil Balabat District Dir Lower.
28.	Imad ud Din s/o Jamal ud Din	House No. 13 C2 Street No. 10 Phase 5 Hayatabad Peshawar.
29.	Muhammad Arshad Khan s/o Din Muhammad	Mansoor Abad Village & P/O Khal District Dir Lower.
30.	Miraj Muhammad s/o Badshah Muhammad	House No. 190, Phase-II, Sector-41 Street No. 6 Hayatabad Peshawar.
31.	Wajid Shah s/o Rashid Khan	Officer Block, P-9-A, Gubshan Rehman Colony Kohat Road Peshawar.
32.	Anjad Iqbal s/o Abdul Latif Khan	C/O Admin Office NWFP Agricultural University Peshawar.
33.	Basharat Ahmad s/o Zulfiqar Sher	District Chitral Tehsil Tokow P/O Reeh Village Reeh.
34.	Khalid ur Rehman s/o Muhammad Sheraz	Village Parwak Tehsil Mustaj District Chitral.
35.	Ijaz Anwar s/o Aurang Zeb	H. No. 101, Street No. 10, Sector 1-2, Phase-2 Hayatabad Peshawar.
36.	Farrukh Saif s/o Mumber Khan	Village Sultanas Post Office PIR Baba Tehsil Dargai District Buner.
37.	Khalid Khan s/o Hkhar Hussain	H.No. K-1, 87 Phase, 1 Hayatabad Peshawar.
38.	Zahid Ullah s/o Rukun Din	Village Lassi Garhi Bostu Khel P/O Daura Bazar PIR Kohat.
39.	Zeeshan Ahmed s/o Kitayat Ullah Khan	Moh. Kot Bagh District Hanjra.
40.	Fazal Muhammad s/o Ahmad Khan	Village & P/O Sarozai, District Hanjra.
41.	Abbas Ali s/o Liaqat Ali	Karam Jan General Store Pujabi Bazar Panchmar Kurram Agency.
42.	Rizwan Ullah s/o Shah Niaz Khan	Village & P/O Bazar Ahmad Khan Bannu near Union Council Bazar Ahmad.
43.	Aman Ullah Khan s/o Muhammad Sher Khan	Village Arada Khel District P/O Ghoriwala District Bannu.
44.	Nasir Ullah Khan s/o Muhammad Iqbal	Village Shalbari P/O Bharat District Bannu.
45.	Imran Ullah Khan s/o Muhammad Aslam Khan	Lanchi Abad Serai Nourang, St. Hap Zarwali Khan Khattak District Fako Mawat.
46.	Saleem Parvez s/o Ghulam Qasim	St. No. 1284 Abadi Near Jaffer Colony Moh. Garhi Sadhozar Village Kotar Tank Road District PIR Khan.
47.	Mirhaj Sikandar Yar Khan s/o Sikandar Yar Khan	Yak House, Yar Street Bannu Road PIR Khan.
48.	Ebaad Wazir s/o Abdul Wahid	House No. 78 Street No. 1 Sector 1-2, Phase III Hayatabad Peshawar.
49.	Noor Rehman s/o Abdur Rehman	Chinar Zer-Sar Tehsil Maku South Waziristan Agency.
50.	Ihsanullah s/o Rehman Ullah	Village Khaddi, Tehsil Murah C/O Miralam Book Seller Man Bazar Mu. Ali Adda, N.W.A.
51.	Muhammad Munir Khan s/o Ghulam Muhammad	Moh. Chowki Village Sami Khairabad P/O Khair Abad Tehsil Bahakot District Munscha.
52.	Muhammad Arif Khan s/o Muhammad Banaras Khan	Village Bostan P/O Qabuldar Abad District & Tehsil Munscha.
53.	Sadaqat Nisar s/o Nisar Muhammad Khan	Moh. Taid Abad, Dail No. 1 District Munscha.
54.	Zulfiqar Ali s/o Zardad Khan	Village & P/O Bodla Via Haychan District Abbottabad.

in P.O. &
Munscha
P.O. Sarozai
District Hanjra
in Bannu
in Pabbi
in District
in Hanjra

56	Inam ul Haq s/o Muhammad Asraf	Village ... District Abbottabad
57	Muhammad Uzair s/o Muhammad Akram	H.No. 133 Moh. Masaza Nawashe (A.T.D) Abbottabad. Village Shah Maqsood P.O. Sars-e-Saleh District Haripur
58	Bashir Ahmad s/o Sikandar Khan	Village & P.O. Nartopa District Haripur
59	Muhammad Sajid Farooq s/o Gohar Rehman	H.No. 1432 Sect. No. 01 Kafalat Town Slup District Haripur
60	Tufail Muhammad s/o Muhammad Ghaffar Khan	Village Chappor Gram District Battagram Hazara
61	Abdul Ghafoor s/o Muhammad Sabir Khan	Village Khoshu Tehsil Daska District Kohistan
62	Abdul Sattar Khan s/o Sharif Khan	Village Sher Kot Tehsil Pata District Kohistan
63	Muhammad Raza Khan s/o Taj Ali Khan	Sargana Muhammad Khan P.O. Lajpur District Taki Marwat

On appointment they are posted/allotted to the Region/District as noted against their names:-

S/NO	NAME	Region/District
1.	Syed Khalid Shah	CCP Peshawar/Peshawar
2.	Irfan	CCP Peshawar/Peshawar
3.	Naseem Haider Khan	CCP Peshawar/Peshawar
4.	Faisal Rehman	CCP Peshawar/Peshawar
5.	Khalid Anwar	CCP Peshawar/Peshawar
6.	Ahmad Rashid	CCP Peshawar/Peshawar
7.	Inam Alam Khan Khalil	CCP Peshawar/Peshawar
8.	Sajjad Ahmad Khan	CCP Peshawar/Peshawar
9.	Muhammad Abid Afridi	CCP Peshawar/Peshawar
10.	Shakir Ullah	CCP Peshawar/Peshawar
11.	Awal Sher Khan	CCP Peshawar/Peshawar
12.	Shahid Khan	Mardan Region/Mardan District
13.	Ajab Khan	Mardan Region/Mardan District
14.	Mohsin Fayyad	Mardan Region/Mardan District
15.	Gouhar Ali	Mardan Region/Swabi District
16.	Babar Ali	Mardan Region/Swabi District
17.	Murtaza Ali	Mardan Region/Swabi District
18.	Abdul Baseer	Mardan Region/Swabi District
19.	Hafeez ur Rehman	CCP Peshawar/Nowshera District
20.	Akhtar Naseer	CCP Peshawar/Nowshera District
21.	Inam Ullah	CCP Peshawar/Nowshera District
22.	Fazal Malik	Malakand Region/Swat District
23.	Muhammad Ali	Malakand Region/Swat District
24.	Akhtar Ali	Malakand Region/Swat District
25.	Kaleem Ullah	Malakand Region/Swat District
26.	Aziz ur Rehman	Malakand Region/Swat District
27.	Mukaram Shah	Malakand Region/Dir Lower District
28.	Imad ud Din	Malakand Region/Dir Lower District
29.	Muhammad Arshad Khan	Malakand Region/Dir Lower District
30.	Miraj Muhammad	Malakand Region/Dir Upper District
31.	Wajid Shah	Malakand Region/Dir Upper District
32.	Anjad Iqbal	Malakand Region/Shangha District
33.	Basharat Ahmad	Malakand Region/Chitral District
34.	Khalil ur Rehman	Malakand Region/Chitral District
35.	Ijaz Anwar	Malakand Region/Buner District
36.	Farrukh Sar	Malakand Region/Buner District
37.	Khalid Khan	Malakand Region/Buner District
38.	Zahid Ullah	Kohat Region/Kohat District
39.	Zeeshan Ahmed	Kohat Region/Hangai District
40.	Fazal Muhammad	Kohat Region/Hangai District
41.	Abbas Ali	Kohat Region/Hangai District

43	Rizwan Ullah	Bannu Region/Bannu District
43	Aman Ullah Khan	Bannu Region/Bannu District
44	Nasir Ullah Khan	Bannu Region/Bannu District
45	Imran Ullah Khan	Bannu Region/Lakki Marwat
46	Saleem Parvez	DIKhan Region/DIKhan District
47	Minhaj Sikandar Yar Khan	DIKhan Region/DIKhan District
48	Ebaad Wazir	DIKhan Region/DIKhan District
49	Noor Rehman	DIKhan Region/DIKhan District
X 50	Ihsanullah	DIKhan Region/DIKhan District
51	Muhammad Muir Khan	Hazara Region/Manshera District
52	Muhammad Arif Khan	Hazara Region/Manshera District
53	Sadaqat Nisar	Hazara Region/Manshera District
54	Zulfiqar Ali	Hazara Region/Abbottabad District
55	Inam ul Haq	Hazara Region/Abbottabad District
56	Junaid Irshad	Hazara Region/Abbottabad District
57	Muhammad Uzair	Hazara Region/Haripur District
58	Bashir Ahmad	Hazara Region/Haripur District
59	Muhammad Sajid Farooq	Hazara Region/Haripur District
60	Tufail Muhammad	Hazara Region/Battagram District
61	Abdul Ghafoor	Hazara Region/Kohistan District
62	Abdul Sattar Khan	Hazara Region/Kohistan District
63	Muhammad Raza Khan	Bannu Region/Lakki Marwat

Necessary Notification regarding their appointment may please be issued subject to Medical Test under the relevant rules and prescribed manner under intimation to all concerned. Their applications together other relevant documents are also sent herewith for placing in their Character Roll/ Service Roll.

Put complete document & Application of the candidates

MALIK NAVEED KHAN
PROVINCIAL POLICE OFFICER,
NWFP, PESHAWAR.
1 / /2009.

No. /F-II, Dated Peshawar the

Copy of above is forwarded for information and necessary action to Mr. Amir Kalam Shah, Director Examination, NWFP, Public Service Commission, 2-Fort Road Peshawar Cantt. w/r to his letter No. NWFP PSC (ASD) Interview 2009, 05195 dated 04.02.2009.

For/Seen

[Signature]

Chief Inspector General of Police
DIKhan, Dargu.

[Signature]
(ABDUL NAVEED KHAN MARWAT)
DPO
DICO Headquarter,
For Provincial Police Officer,
NWFP, Peshawar.

- From : The Provincial Police Officer,
NWFP, Peshawar.
- To : 1. The Capital City Police Officer,
Peshawar.
2. The Deputy Inspector General of Police,
Mardan Region-I, Mardan.
3. The Deputy Inspector General of Police,
Malakand Region-III, Swat.
4. The Deputy Inspector General of Police,
Kohat Region.
5. The Deputy Inspector General of Police,
Bannu Region.
6. The Deputy Inspector General of Police,
D.I.Khan Region.
7. The Deputy Inspector General of Police,
Hazara Region Abbottabad.

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19-2-09

No. 3867-73/E-II, Dated Peshawar the 12/2 /2009.

Subject: RECRUITMENT OF 76 ASIs (BPS-09) IN PROVINCIAL POLICE DEPARTMENT (FRESH CANDIDATES) ADVT: NO. 01/2007)

Memo.

Consequent upon recommendation of NWFP Public Service Commission Peshawar vide letter NWFP-PSC (ASI)-Interview 2009/05195 dated: 04.02.2009, the appointment of the following candidates are hereby approved as Assistant Sub Inspectors BPS-09 (3820-230-10720) against the 25% quota reserved for direct appointment in Police Department, vide Govt. of NWFP Home & T.As Department, letter No. (Police) HD/03-22/2000 dated: 17.10.2003:-

S/No	Name & Parentage	Address
1.	Syed Khalid Shah s/o Syed Yaqoub Shah	Out side Yakka Foot Zeppeer Abip Chowk District Peshawar
2.	Irfan s/o Sher Afzal	Village Koda Mohsin Khan Moh. Malakay District Peshawar
3.	Naeem Haider Khan s/o Ghulam Haider Khan.	Ghani Atta Muhammad Del Bahadar Khet Road Peshawar
4.	Faisal Rehman s/o Gula Jan	11/No. 1549 Mohr Ghari Mir Zaman Shah Haqq Dalgal Peshawar
5.	Khalid Anwar s/o Abdul Malik Khan.	11/No. 407, Sect. No. 02 Phase No 04 Hayatabad Peshawar
6.	Ahmad Rashid s/o Abdul Rashed Arif	11/No. 205 Moh. Pir Gulab Shah, Heshung Peshawar
7.	Imran Alam Khan Khalil s/o Mawaz Alam Khan Khalil.	11/No. F-14 St. No. 6 Canal Town Ruseh Bugh Road Peshawar
8.	Sajjad Ahmad Khan s/o Amin Ullah Jan	Village Opaza Bala P/O Mathra District Peshawar
9.	Muhammad Abid Afridi s/o Malik Muhammad Akbar Afridi	Azam Service Station old Gara Near Bari Tehsil Khyber Agency
10.	Shakir Ullah s/o Sharaf Hassan	Pajaggi Road Pukh Ptd Haji Shad Khan Qilla P/O Faqr Abad District Peshawar.
11.	Awal Sher Khan s/o Nadir Sher	Village Kala Khet Mohr Bahar Khet P/O Malani District Peshawar.
	Shahid Khan s/o Sadbar Khan	Room No. 135 House No. 3 New Blvd. Engineering University, Peshawar
	Asb Khan s/o Abdul Shakoor	Village Raja Kati P/O Baghidada District Mardan
	Arif Nawad s/o Syed Abdur Rehman	20 D, Police Housing Colony, Nasir Bugh Road, Peshawar
	Ali s/o Hazrat Gul	District & Federal Swabi P/O Chabaghi Village Mahal, Abad

EE
7/2/09

16.	Bahar Ali s/o Ayub Khan	Village Manshabdar District Swabi P/O Kernal Sher Kili.
17.	Murtaza Ali s/o Mohammad Ayub Sant.	Village Awota Shari P/O Kernal Sher Kili District Swabi
18.	Abdul Baseer s/o Abdul Maroof	Moh: Punna Bazar Village & P/O Tordher Tehsil Fajhor District Swabi
19.	Hafeez ur Rehman s/o Kandar Khan	Village Wazir Garhi P/O Pabbi District Nowshera.
20.	Akhtar Naseer s/o Naseer ud Din	Village & P/O Azakhel Bada, Moh: Wazir Abad District Nowshera
21.	Inam Ullah s/o Jamshid	Moh. Godam Korooma, Village & Post Office Kheshti Payan, Tehsil & District Nowshera.
22.	Fazal Malik s/o Fazal Hamid	Village Taidid Abad P/O Sakhakot District Malakand Tehsil Dargai.
23.	Muhammad Ali s/o Haji Faramoz Khan	Stadium Road Chinar Colony Anankor District Swat.
24.	Akhtar Ali s/o Khurshid Ali	Village Bara Bama Khela Tehsil & P/O Matta District Swat.
25.	Kaleem Ullah s/o Liaqat Ali	Village Kot P/O Box Charbagh District Swat NWFP
26.	Aziz ur Rehman s/o Ihsan Ullah	Village Kufadher, P/O Balogram Tehsil Babozai, District Swat (NWFP)
27.	Mukaram Shah s/o Ahmad Shah	Village Baroon P/O Rabat Tehsil Balabul District Dir Lower.
28.	Imad ud Din s/o Jamal ud Din	House No. 13 C2 Street No. 10 Phase 3 Hayatabad Peshawar
29.	Muhammad Arshad Khan s/o Din Muhammad	Mansoor Abad Village & P/O Khal District Dir Lower
30.	Miraj Muhammad s/o Badshah Muhammad	House No. 190, Phase-II, Sector- II Street No. 6 Hayatabad Peshawar
31.	Wajid Shah s/o Rashid Khan	Officer Block 19-A Gulshan Rehman Colony Kohat Road Peshawar
32.	Amjad Iqbal s/o Abdul Latif Khan	C/O Admin Officer NWFP Agricultural University Peshawar.
33.	Basharat Ahmad s/o Zulfiqar Sher	District Chitral Tehsil Torkow P/O Reeli Village Reeli.
34.	Khalil ur Rehman s/o Muhammad Sheraz	Village Puhwak Tehsil Musty District Chitral.
35.	Ijaz Anwar s/o Aungang Zeb	H. No. 101, Street No. 10, Sector J-2, Phase-2 Hayatabad Peshawar.
36.	Farrukh Sair s/o Mumber Khan	Village Sultanwas Post Office PIR Baba Tehsil Dargai District Buner
37.	Khalid Khan s/o Htikhar Hussain	H/No. K-9, S/Phase 3 Hayatabad Peshawar
38.	Zahid Ullah s/o Ruken Din	Village Lass Garhi Buzi Khel P/O Daira Bazar PIR Kohat.
39.	Zeeshan Ahmed s/o Kitayat Ullah Khan	Moh. Kor Bagh District Hangu
40.	Fazal Muhammad s/o Ahmad Khan	Village & P/O Sarozan, District Hangu
41.	Abbas Ali s/o Liaqat Ali	Kazam Jan General Store Punjabi Bazar Parachinar Kurram Agency
42.	Rizwan Ullah s/o Shah Niaz Khan	Village & P/O Bazar Ahmad Khan Bannu near Union Council Bazar Ahmad
43.	Aman Ullah Khan s/o Muhammad Sher Khan	Village Arsala Michen Khel P/O Ghorwala District Bannu
44.	Nasir Ullah Khan s/o Muhammad Iqbal	Village Shalhan P/O Bhalal District Bannu
45.	Imran Ullah Khan s/o Muhammad Aslam Khan	Tanchi Abad Serai Nourang, SE Haji Zarwah Khan Khattak District Laska, Mawwal SE No. 1Nai Abadi Near Tarcent Colony Moh: Gani Saddozai Village Kurai Tank Road District DDKhan
46.	Saleem Parvez s/o Ghulam Qasim	Yar House, Yar Street Bannu Road, DDKhan
47.	Minhaj Sikandar Yar Khan s/o Sikandar Yar Khan	House No. 28 Street No. 1 Sector I, 2, Phase III, Hayatabad Peshawar
48.	Ebad Wazir s/o Abdul Wahid	Chitral Zer-Sai Tehsil Makin South Waziristan Agency.
49.	Noor Rehman s/o Abdur Rehman	Village Khaddi, Tehsil Mushi C/O Muratan Book Seller Mann Bazar Mo Ali Adla, N.W.A.
50.	Ihsanullah s/o Rehman Ullah	Moh: Chowki, Village Sair Khanabad P/O Khair Abad Tehsil, Babakot District Manshera.
51.	Muhammad Munir Khan s/o Ghulam Muhammad	Village Hussainjan P/O Qalandar Abad District & Tehsil Manshera
52.	Muhammad Arif Khan s/o Muhammad Banaras Khan	Moh: Jalal Abad, Dal No. 1 District Manshera
53.	Sadaqat Nisar s/o Nisar Muhammad Khan	Village & P/O Bodha Via Havelan District Asbottabad
54.	Zulfiqar Ali s/o Zardad Khan	

55.	Inam ul Haq s/o Muhammad Ashraf	Village Gehial Qazian P/O Rief District Abbottabad.
56.	Junaid Irshad s/o Irshad Hussain	H. No. TC 1332 Moh. Mosazi Nawasher (A.L.D) Abbottabad
57.	Muhammad Uzair s/o Muhammad Akram	Village Shah Maqsood P/O Sarai- Saleh District Haripur
58.	Bashir Ahmad s/o Sikandar Khan	Village & P/O Nanopa District Haripur
59.	Muhammad Sajid Farooq s/o Gohar Rehman	H/No.182 Sect. No.01 Kalabat Town Ship District Haripur
60.	Tufail Muhammad s/o Muhammad Ghaffar Khan	Village Chappan Gram District Battagram Hazara
61.	Abdul Ghafoor s/o Muhammad Sabir Khan	Village Khoshi Tehsil Dassa District Kohistan
62.	Abdul Sattar Khan s/o Sharif Khan	Village Sher Kot Tehsil Palas District Kohistan
63.	Muhammad Raza Khan s/o Taj Ali Khan	Sargana Muhammad Khan P/O Tajor District Lakki Marwat

On appointment they are posted/allotted to the Region/District as noted against their names:-

S/NO	NAME	Region/District
1.	Syed Khalid Shah	CCP Peshawar/Peshawar
2.	Irfan	CCP Peshawar/Peshawar
3.	Naeem Haider Khan	CCP Peshawar/Peshawar
4.	Faisal Rehman	CCP Peshawar/Peshawar
5.	Khalid Anwar	CCP Peshawar/Peshawar
6.	Ahmad Rashid	CCP Peshawar/Peshawar
7.	Imran Alam Khan Khalil	CCP Peshawar/Peshawar
8.	Sajjad Ahmad Khan	CCP Peshawar/Peshawar
9.	Muhammad Abid Afridi	CCP Peshawar/Peshawar
10.	Shakir Ullah	CCP Peshawar/Peshawar
11.	Awal Sher Khan	CCP Peshawar/Peshawar
12.	Shahid Khan	Mardan Region/Mardan District
13.	Ajab Khan	Mardan Region/Mardan District
14.	Mohsin Fawad	Mardan Region/Mardan District
15.	Gouhar Ali	Mardan Region/Swabi District
16.	Bahar Ali	Mardan Region/Swabi District
17.	Murtaza Ali	Mardan Region/Swabi District
18.	Abdul Baseer	Mardan Region/Swabi District
19.	Hafeez ur Rehman	CCP Peshawar/Nowshera District
20.	Akhtar Naseer	CCP Peshawar/Nowshera District
21.	Inam Ullah	CCP Peshawar/Nowshera District
22.	Fazal Malik	Malakand Region/Swat District
23.	Muhammad Ali	Malakand Region/Swat District
24.	Akhtar Ali	Malakand Region/Swat District
25.	Kaleem Ullah	Malakand Region/Swat District
26.	Aziz ur Rehman	Malakand Region/Swat District
27.	Mukaram Shah	Malakand Region/Dir Lower District
28.	Imad ud Din	Malakand Region/Dir Lower District
29.	Muhammad Arshad Khan	Malakand Region/Dir Lower District
30.	Miraj Muhammad	Malakand Region/Dir Upper District
31.	Wajid Shah	Malakand Region/Dir Upper District
32.	Anjad Iqbal	Malakand Region/Shangha District
33.	Basrarat Ahmad	Malakand Region/Central District
34.	Khalil ur Rehman	Malakand Region/Chitral District
35.	Ijaz Anwar	Malakand Region/Buner District
36.	Farrukh Sair	Malakand Region/Buner District
37.	Khalid Khan	Malakand Region/Buner District
38.	Zahid Ullah	Kohat Region/Kohat District
39.	Zeeshan Ahmed	Kohat Region/Hangu District
40.	Fazal Muhammad	Kohat Region/Hangu District
41.	Abbas Ali	Kohat Region/Hangu District

42.	Rizwan Ullah	Bannu Region/Bannu District
43.	Aman Ullah Khan	Bannu Region/Bannu District
44.	Nasir Ullah Khan	Bannu Region/Bannu District
45.	Inran Ullah Khan	Bannu Region/Bannu District
46.	Saleem Parvez	Bannu Region/Lakki Marwat
47.	Minhaj Sikandar Yar Khan	DIKhan Region/DIKhan District
48.	Ebaad Wazir	DIKhan Region/DIKhan District
49.	Noor Rehman	DIKhan Region/DIKhan District
X 50.	Ihsanullah	DIKhan Region/DIKhan District
51.	Muhammad Munir Khan	DIKhan Region/DIKhan District
52.	Muhammad Arif Khan	Hazara Region/Manshera District
53.	Sadaqat Nisar	Hazara Region/Manshera District
54.	Zulfikar Ali	Hazara Region/Manshera District
55.	Inam ul Haq	Hazara Region/Abbottabad District
56.	Junaid Irshad	Hazara Region/Abbottabad District
57.	Muhammad Uzair	Hazara Region/Abbottabad District
58.	Bashir Ahmad	Hazara Region/Haripur District
59.	Muhammad Sajid Farooq	Hazara Region/Haripur District
60.	Tufail Muhammad	Hazara Region/Haripur District
61.	Abdul Ghafoor	Hazara Region/Balagran District
62.	Abdul Sattar Khan	Hazara Region/Kohistan District
63.	Muhammad Raza Khan	Hazara Region/Kohistan District
		Bannu Region/Lakki Marwat

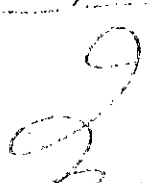
Necessary Notification regarding their appointment may please be issued subject to Medical Test under the relevant rules and prescribed manner under intimation to all concerned. Their applications together other relevant documents are also sent herewith for placing in their Character Roll/ Service Roll.


File complete document - 5
& attached of the candidates

MALIK NAVEED KHAN
 PROVINCIAL POLICE OFFICER,
 NWFP, PESHAWAR.
 / / 2009.

No /E-II, Dated Peshawar the

Copy of above is forwarded for information and necessary action to Mr. Amir Kalam Shah, Director Examination, NWFP, Public Service Commission, 2-Fort Road Peshawar Cantt. w/r to his letter No. NWFP PSC (ASD)-Interview 2009, 05195 dated 04.02.2009.

For/Seen

 D. J. Khan, Range,


 (ABDUL MAJID KHAN MARWAT)
 PSP
 DIG/Headquarters,
 For Provincial Police Officer,
 NWFP, Peshawar.

From

The Regional Police Officer,
Dera Ismail Khan

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To

The District Police Officer,
Dera Ismail Khan

No. 582 /ES Dated D.I.Khan the

17/02/2009

Subject

RECRUITMENT OF 05 MALE ASIs (BPS-09)

Memorandum

The following candidates are recommended by the NWFP Public Service Commission have been approved for appointment as P.ASIs in Police Department. They should be medically examined and their Character verified. The medical certificates alongwith Police verification rolls may be sent to this office. If their condonation is required may also be sent to this office for further necessary action: -

1. Salim Pervez S/o Ghulam Qasim r/o Street No.1 Nai Abadi near Tareen Colony Mohallah Gari Sadozai City D.I.Khan.
2. Minhaj Sikandar Yar Khan s/o Sikandar Yar Khan r/o Yar House, Yar Street Bannu road D.I.Khan.
3. Ebaad Wazir s/o Abdul Wahid r/o House No.28 Street I Sector L2, Phase-III Hayatabad Peshawar.
4. Noor Rehman s/o Abdur Rehman r/o Chlarai Zer-Sar Tehsil Makim SWA c/o Haji Andaz Gul Tember & Iron Store Kohat road Peshawar.
5. Ihsanullah s/o Rehmanullah r/o Village Khaddi, Tehsil Mirali c/o Miralam Bookseller Main Bazar Mirali Adda North Waziristan Agency.

Their applications together with other relevant documents are also sent herewith.

Encl: As Above

(DR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,
Dera Ismail Khan

CONFIDENTIAL

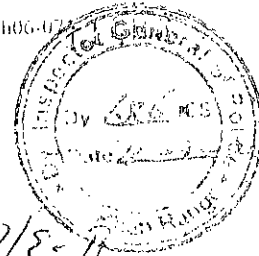
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NWFP PUBLIC SERVICE COMMISSION
Feroz Road Peshawar Cantt
Phone No: 991-9713863 (1082), 9214131
www.psc.gov.pk



NWFP-PSC-EXAM-ASI-Fresh06-07

Dated: 25-12-2009



2678/E-11

1/3/Photo

Director Examination
NWFP Public Service Commission
Peshawar

The Provincial Police Officer
NWFP Peshawar.

Subject: RECRUITMENT TO THE POST OF ASSISTANT SUB INSPECTOR (BPS-09)
IN POLICE DEPARTMENT ADVT. NO. 01/2007

In continuation to this office letter No.12755 dated 10-03-2009 on the subject noted above and to state that the inter-segment position of the recommended candidates for the post of ASI (BPS-09) in Police Deptt. is sent herewith for record at your office, as per detail given below.

Serial Order	Roll No	Name With Father Name	District/Zone
1	603	Saleem Parvez S/O Ghulam Qasim	D.I Khan-1
2	2304	Ijaz Anwar S/O Aurangzeb	Buner-3
3	1220	Hafeez-ur-Rehman S/O Kamdar Khan	Kowshera-2
4	2143	Gouhar Ali S/O Hazrat Gul	Swabi-2
5	2712	Muhammad Nawab Khan S/O Armanash Khan	Swat-3
6	2704	Miraj Muhammad S/O Badshah Muhammad	Du Upper-3
7	2611	Amjad Iqbal S/O Abdul Latif Khan	Shangha-1
8	2939	Rizwan Ullah S/O Shah Niaz Khan	Bannu-4
9	2298	Farrukh Saif S/O Mumber Khan	Bardan-1
10	2767	Anwar Ullah Khan S/O Muhammad Sher Khan	Bannu-4
11	557	Minhaj Sikandar Yar Khan S/O Sikandar Yar Khan	D.I Khan-4
12	1981	Syed Khalid Shah S/O Syed Yaqoub Shah	Peshawar-2
13	2622	Khalid Khan S/O Hukhtar Hussain	Bajaur Agy-2
14	719	Inam Ullah S/O Anwar Ullah	Tank-4
15	1551	Inam S/O Sher Afzal	Peshawar-2
16	1777	Naeem Hinder Khan S/O Ghulam Hinder Khan	Peshawar-2
17	1582	Sajjad Ahmad Khan S/O Anwar Ullah Khan	Peshawar-2
18	967	Farooq S/O Sher Khan	Mardan-2
19	1021	Moham Fawad S/O Syed Abdul Rehman	Mardan-2
20	1200	Akhtar Naseer S/O Naseer-ud-Din	Nowshera-2
21	1374	Shahid Khan S/O Kamdar Khan	Mardan-2

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2388	Umar Irfan S/O Irfan Ullah	Banawal
2473	Mukaram Shah S/O Ahmad Shah	Dir Lower/3
24	2919 Nasir Ullah Khan S/O Muhammad Iqbal	Bannawal
25	1528 Imran Alam Khan-Khalil S/O Mawaz Alam Khan Khalil	Peshawar/2
26	2522 Abdul Ghafoor S/O Muhammad Sabir Khan	Kohistan/3
27	909 Zeeshan Ahmed S/O Kifayat Ullah Khan	Hangaw/4
28	920 Ajab Khan S/O Abdul Shakoor	Mardan/2
29	1226 Inam Ullah S/O Jamshed Khan	Nowshera/2
30	1461 Faisal Rehman S/O Gula Jan	Peshawar/2
31	1584 Khalid Anwar S/O Abdul Malik Khan	Peshawar/2
32	2902 Muhammad Raza Khan S/O Taj Ali Khan	F.R Lakk/1
33	1356 Ahmad Rashid S/O Abdul Rasheed Arif	Peshawar/2
34	2524 Abdul Sattar Khan S/O Sharif Khan	Kohistan/3
35	2562 Fazal Malik S/O Fazal Hamid	Malakand Agy/3
36	524 Ihsan Ullah S/O Rehman Ullah	N.W Agy/3
37	2346 Khalil-ur-Rehman Sherazi S/O Muhammad Sherazi	Chitral/3
38	3017 Ebad Wazir S/O Abdul Wahid	S.W Agy/1
39	2128 Bahar Ali S/O Ayub Khan	Swabi/2
40	1631 Muhammad Abid Afridi S/O Malik Muhammad Akbar Afridi	Khyber Agy/1
41	2424 Imad-ud-Din S/O Jamal-ud-Din	Dir Lower/3
42	743 Fazal Muhammad S/O Ahmad Khan	Hangaw/1
43	2707 Muhammad Ali S/O Haji Faranoz Khan	Swat/3
44	2514 Wajid Shah S/O Rashid Khan	Dir Upper/3
45	470 Allah Nawaz Khan S/O Sher Ali Khan	N.W Agy/1
46	3054 Imran Ullah Khan S/O Muhammad Aslam Khan	Lakk/1
47	2402 Bakht Zaman Khan S/O Khaista Bacha	Dir Upper/3
48	2333 Basharat Ahmad S/O Zulfiqar Sher	Chitral/3
49	265 Akhtar Ali S/O Khurshid Ali	Swat/3
50	2150 Humayoon Khan S/O Saïd-uz-Zaman	Swabi/2
51	2700 Kaleem Ullah S/O Liaqat Ali Khan	Swat/3
52	2203 Murtaza Ali S/O Muhammad Ayub Sami	Swabi/2
53	69 Muhammad Arshad S/O Muhammad Zahir	Battagram/3
54	1943 Shakir Ullah S/O Sharaf Hassan	Khyber Agy/1
55	2452 Muhammad Arshad Khan S/O Din Muhammad	Dir Lower/3
56	3095 Abdul Baseer S/O Abdul Maroof	Swabi/2
57	2624 Muhammad Abbas S/O Luqman	Shangla/3
58	335 Noor Rehman S/O Abdul Rehman	S.W Agy/1
59	163 Zulfiqar Ali S/O Zardad	Abbottabad/3
60	225 Muhammad Uzair S/O Muhammad Akram	Haripur/3
61	46 Inam-ul-Haq S/O Muhammad A. Jiraf	Abbottabad/3

1865	Bashir Ahmad S/O Sikandar Khan	Haripur/5	
2073	Aziz-ur-Rehman S/O Ihsan Ullah	Swat/5	
221	Muhammad Sajid Farooq S/O Gohar Rehman	Haripur/5	
65	1424	Awal Sher Khan S/O Nadir Sher	Khyber Agy/1
66	145	Tufail Muhammad S/O Muhammad Ghaffar Khan	Battagram/3
67	206	Muhammad Asad Yousaf S/O Muhammad Yousaf	Haripur/5
68	53	Junaid Irshad S/O Irshad Hussain	Abbottabad/5
69	350	Muhammad Muncer Khan S/O Ghulam Muhammad	Manshra/5
70	815	Zahid Ullah S/O Rukun Din	F.R Kohat/1
71	844	Imran Khan S/O Hakim Khan	Kohat/4
72	333	Mudassar Zia S/O Ghulam Sarwar	Manshra/5
73	339	Muhammad Arif Khan S/O Muhammad Banaras Khan	Manshra/5
74	391	Sadaqat Nisar S/O Nisar Muhammad Khan	Manshra/5
75	763	Abbas Ali S/O Liaqat Ali	Kurram Agy/1
76	798	Mujahid Hussain S/O Nasar Ali	Kurram Agy/1

(AMIR) AM STAN
 DIRECTOR EXAMINATION
 35

EC
 11/3/10

OFFICE OF THE PROVINCIAL POLICE OFFICER NWFP, PESHAWAR.

No. 7012-18 /E-II dated Peshawar, the 04/9/2010.

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

1. Capital City Police Officer Peshawar.
2. D.I.-G Malakand, Kohat, D.I. Khan, Bannu, Mardan and Hazara, Regions.

no. 885-86/15 dt. 12-03-2010

Copy to D.I.G/Malaka and
 for info & information and action

[Signature]
 REGISTERED
 FOR PROVINCIAL POLICE OFFICER,
 N.W.F.P., PESHAWAR

[Signature]
 By Inspector General of Police
 D.I. Khan Region.

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From : The Provincial Police Officer,
NWFP, Peshawar

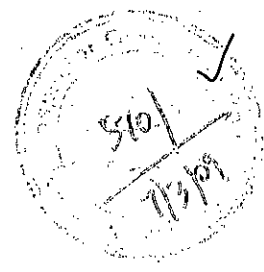
To : The Deputy Inspector General of Police,
Mardan Region-I, Mardan.

The Deputy Inspector General of Police,
Malakand Region-III, Swat.

The Deputy Inspector General of Police,
Kohat Region

The Deputy Inspector General of Police,
Dikhan Region.

The Deputy Inspector General of Police,
Hazara-Region Abbottabad.



No. 5682-91 /E-II, Dated Peshawar the 28 / 12 / 2009

Subject: RECRUITMENT OF 76 ASIS (BPS-09) IN PROVINCIAL POLICE DEPARTMENT (FRESH CANDIDATES) ADVT: NO. 01/2007)

Memo.

In continuation of this office Memo No. 3867-73/E-II, dated 12.02.2009.

Consequent upon recommendation of NWFP Public Service Commission Peshawar vide letter No. 12188, dated 21.02.2009, the appointment of the following candidates are hereby approved as Assistant Sub Inspectors BPS-09 (3820-230-10720) against the 25% quota reserved for direct appointment in Police Department, vide Govt. of NWFP Home & LAs Department, letter No. (Police) HD/03-22/2000 dated: 17.10.2003:-

S/No	Name & Parentage	Address
1.	Muhammad Asad Yousaf s/o Muhammad Yousaf	Street No 5 H/N, 12 Sir Syed Colony, Mandian District Abbottabad
2.	Farooq s/o Sher Ghani	Village & P/O Katlang Moh: Mamoti District Mardan.
3.	Muhammad Nawab s/o Armanash Khan	Village Faqira Tehsil & P/O Khwaza Khehla District Swat.
4.	Inuran Khan s/o Hakim Khan	Ghari Mawaz Khan, Moh: Mondou H/No. 04 District Kohat.
5.	Muhammad Arshad s/o Muhammad Zahir	Gulab Stationary mart near Muslim Commercial Bank Mian Bazzr District Battagram
6.	Mujahid Hussain s/o Nasar Ali	Haji Mansab Ali Food Gree Merchants Masjid Road Kashmir Chowk Parachinar Kurram Agency
7.	Hunayoon Khan s/o Saïd-u/- Zaman	Faza nr Rehman colony H/No.14 Bara Road Bara Gate Peshawar.
8. ✓	Inam Ullah s/o Atta Ullah	Ata House near Faqir Gate south Circular Road Dikhan
9.	Mudassar Zia s/o Ghulam Sarwar	Village sugdhar P/O Ghari Habib Ullah Tehsil Balakot District Masehra
10. ✓	Allah Nawaz Khan s/o Sher Ali Khan	Village Zeceraki Tehsil & P/O Mirali north Waziristan Agency.
11.	Bakht Zaman Khan s/o Khaista Bacha	Village & P/O Bibyawar Tehsil & District Dir Upper
12.	Muhammad Abbas s/o Luqman	District officer of Live Stock at Moh: Charry Hujra Tehsil Chakosar District Shangla

On appointment they are posted/alotted to the Region/District as noted against their names:-

S/NO	NAME	Region/District
1.	Muhammad Asad Yousaf	Hazara Region/Haripur District
2.	Farooq	Mardan Region/Mardan District
3.	Muhammad Nawab	Malakand Region/Swat district
4.	Imran Khan	Kohat Region/Kohat District
5.	Muhammad Arshad	Hazara Region/Battagram District
6.	Mujahid Hussain	Kohat Region/Hangu District
7.	Humayoon Khan	Mardan Region/Swabi District
8.	Inam Ullah	DIKhan Region/Fank District
9.	Mudassar Zia	Hazara Region/Manshara District
10.	Allah Nawaz Khan	DIKhan Region/DIKhan District
11.	Bakht Zaman Khan	Malakand Region/Dir Upper District
12.	Muhammad Abbas	Malakand Region/Shangha District

Necessary Notification regarding their appointment may please be issued subject to Medical Test under the relevant rules and prescribed manner under intimation to all concerned. Their applications together other relevant documents are also sent herewith for placing in their Character Roll/ Service Roll.

At original applications & the rolls

MALIK NAVEED KHAN
PROVINCIAL POLICE OFFICER,
NWFP, PESHAWAR.

No. /E-II. Dated Peshawar the / /2009.

Copy of above is forwarded for information and necessary action to Mr. Amir Kalam Shah, Director Examination, NWFP, Public Service Commission, 2-Fort Road Peshawar Cantt. w/r to his letter No. No. 12188, dated 21.02.2009

Muhammad Sulaman Khan
(MUHAMMAD SULAMAN KHAN)
DIG/Headquarters,
For Provincial Police Officer,
NWFP, Peshawar.

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Consequent on the recommendation of NWFP Public Service Commission and approved by PPO NWFP Peshawar vide letter No.3867-73/E-I dated 12.2.2009 and No.5687-91/E-II dated 28.2.2009 against the 25% quota reserved for direct appointment. The following candidates have been approved for appointment as Probation ASIs in Police Department on three years probation in BPS-09 (3820-230-10720) alongwith usual admissible allowances from the date of their arrival in the District subject to the medical fitness and character verification.

They are allotted Range Number and posted to the Districts as noted against their name: -

S #	Name with address	Range Number Allotted	District to which Posted
1	Salim Pervez s/o Ghulam Qasim r/o Street No.1 new Abbadi near Tarin Colony Mohallah Ghari Saduzai Tank road D.I.Khan	87/D	D.I.Khan
2	Minhaj Sikandar Yar Khan s/o Sikandar Yar Khan r/o Yar House, Yar Street Bannu road D.I.Khan	88/D	D.I.Khan
3	Ebaad Wazir s/o Abdul Wahid r/o House No.28 Street I Sector I, Phase-III Hayatabad Peshawar	89/D	D.I.Khan
4	Inamullah s/o Attaullah r/o Atta House near Faqimi gate Circular road D.I.Khan	90/D	Tank

(DR. ISHTIAQ AHMAD MARWAT) PPO
Regional Police Officer
Dera Ismail Khan

No. 1164-65 /ES Dated D.I.Khan the 6 /04/2009

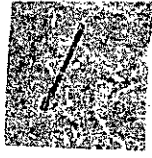
Copy of above is forwarded for information & necessary action to the:

- 1. District Police Officer, Tank.
 - 2. District Police Officer, D.I.Khan.
- Necessary gazette notification may be issued accordingly

Their application forms received from CPO NWFP Peshawar are sent herewith

(DR. ISHTIAQ AHMAD MARWAT) PPO
Regional Police Officer
Dera Ismail Khan

39



- 1. The Provincial Police Officer, NWFP, Peshawar.
- 2. The Capital City Police Officer, Peshawar.
- 3. The Deputy Inspector General of Police, Mardan Region-I, Mardan.
- 4. The Deputy Inspector General of Police, Hazara Region-II, Abbottabad.
- 5. The Deputy Inspector General of Police, Malakand Region-III, Swat.
- 6. The Deputy Inspector General of Police, Bannu Region.
- 7. The Deputy Inspector General of Police, DIKhan Region.



No. 5908-13 /E-II Dated Peshawar the 02/13/2009.

Subject: APPOINTMENT OF POLICE SHUHADA'S SONS/BROTHERS AS ASIS

Memo.

The Honourable Chief Minister NWFP has been pleased to approve the appointment/absorption of the following Police Shuhada's sons/brothers of NWFP Police as Assistant Sub Inspector BPS-09 (3820-230-10720) against 5% quota reserved for "SHUHADA'S SONS"/BROTHERS in Police Department vide Government of NWFP Home & T.As Department letter No. SO (P-I) HD/3-22/08 dated: 19.02.2009 subject to their medical fitness.

S/No	NAME & FATHER NAME	ADDRESS
1.	LHC Aftab Alam No.168 b/o Shaheed Constable Zahoor Alam	Moh: Kishwar Abad Charsadda Road Peshawar.
2.	Constable Nazim Khan b/o Shaheed Constable Niaz Muhammad No. 835	Moh: Lodah Khel Kalu Khan Tehsil & District Swabi
3.	Muhammad Fahir s/o Shaheed Constable Raidullah No. 999	Village Shahdand (Lund Khwar) Tehsil Takhti Bhai District Mardan
4.✓	Constable Muhammad Adnan b/o Shaheed Constable Muhammad Imran No.1226	Village Lodhra Tehsil Paharpur District DIKhan
5.	Junior Clerk Barakat Khan b/o Shaheed Constable Ibrahim Shah	Village Ouch Tehsil Adenzi District Dir Lower
6.	Ihsanullah s/o Shaheed Inspector Hassan Khan	Village Adamzai District Lakki Marwat.
7.	Zia ul Haq s/o Shaheed Sub Inspector Muhammad Azam	Village Baran Kot Tehsil Dargai District Malakand.
8.	Const: Arif ullah brother of Shaheed Constable Inamullah	Moh: Khanu Khel Village Dallo Khel Tehsil & District Lakki Marwat
9.	Const: Muhammad Iqbal b/o Shaheed IHC Zahid Khan	Village Parao Sheikh Mahmood Banda (Jalafa), Tehsil Takhti Bhai, District Mardan.
10.✓	Constable Sharifullah No. 272 b/o of Shaheed Constable Abdul Latif No. 428	Village Ama Khel Tehsil Tank District Tank
11.	Constable Jawad Khan No.1481 b/o Shaheed Constable Wajid No.2212	Village Chamkani Moh: Khawajakhel District Peshawar.
12.	Const: Manzoor Ali No. 1522 s/o Shaheed Constable Gohar Ali	Amir Nawas Khan Koron Manga District Mardan
13.	Constable Azad Khan No.6385 b/o Shaheed Constable Munawar Khan.	Village Gondi Pand Khel Tehsil & District Lakki Marwat.

14-6-89

15-8-89

(41)

FLJ

Consequent on approval by the honorable Chief Minister for appointment/ absorption in Police Shuhada's Sons/ Brothers of Police as ASI in BPS-09 (3820-230-10720) alongwith usual admissible allowances received through PPO NWFP Peshawar vide letter-No.5908-13/E-II dated 2.3.2009 against 5% quota reserved for Shuhada's Sons/ Brothers in Police Department. The following Constables/ Candidates have been approved for appointment/ absorption as P.ASIs in Police Department on three years probation from the date of their arrival in the district subject to the medical fitness and character verification:

They are allotted Range Number and posted to the Districts as noted against their name: -

S#	Name with address	Range Number Allotted	District to which Posted
1	Constable Muhammad Adnan No.922 of D.I.Khan District Brother of Shaheed Constable Muhammad Inran r/o Village Lodhra Tehsil Paharpur District D.I.Khan	91/D	D.I.Khan
2	Constable Kashif Sattar No.1538 Brother of Shaheed Constable Shahid Saleem No.1278 r/o Street Doctor Sarwar Wali House No.4452/MC Mohallah Qasaban District D.I.Khan	92/D	D.I.Khan
3	Constable Sharifullah No.272 Brother of Shaheed Constable Abdul Latif No.428 r/o village Amma Khel Tehsil & District Tank	93/D	Tank
4	Fazal-ur-Rehman S/o Shaheed Constable Ghulam Yasin r/o Diyaf Road D.I.Khan	94/D	D.I.Khan
5	Naqeebullah s/o Shaheed ASI Banat Gul r/o village Sheikh Mula Khel PO Giltoti District D.I.Khan.	95/D	Tank

(CR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,
Dera Ismail Khan

No. 1162-63 /ES Dated D.I.Khan the 6 /01/2009.

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

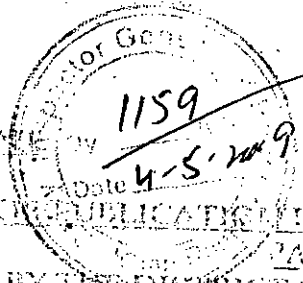
- | | |
|---------------------------------------|--|
| 1. District Police Officer, Tank. | Necessary gazette notification may be issued accordingly |
| 2. District Police Officer, D.I.Khan. | |

Their application forms received from CPO NWFP Peshawar are sent herewith.

And. Appl. Forms
OB/EE/PO
For information
+ mil

(DR. ISHTIAQ AHMAD MARWAT) PPM
Regional Police Officer,
Dera Ismail Khan

(42)



POLICE DEPARTMENT

DIKHAN DISTRICT

NOTIFICATION IN THE NWFP GAZETTE
PART-II

ORDER PASSED BY THE DISTRICT POLICE OFFICER DERA ISMAIL KHAN.

NOTIFICATION

Dated DIKhan the 30/4 /2009

No. / APPOINTMENT AS PASTI - Consequent on the recommendation of NWFP, Public Service Commission and approved by PPO NWFP, Peshawar vide letter No. 3887-73/E-II dated 12.2.09 & No. 567-91/E-II dated 28.2.09 against 25% quota reserved for direct appointment. The following candidate have been approved for appointment as Probation ABl's in Police Department on three year probation period in DPS-4 (3820-230-10730) alongwith usual admissible allowances from the date noted against each their names vide BPO Police, DIKhan Endst: No.1164-45/RS, dated 6.01.09.

They are allotted Range Number as noted against their names.

No.	Name and Number	Range Number allotted	Date of appointment
1	Abdul Waheed s/o Abdul Waheed r/o House No. 21, Daman I Sector, I Phase-III Hayatabad Peshawar	89/D	24.2.09
2	Mahidul Sikandar Yar Khan s/o Sikander Yar Khan r/o Yar House Yar Street banaru road Peshawar	88/D	7.3.09
3	Gulshan Pervez s/o Ghulam Qasim r/o Street No. 1 near Abbadi near Tarin Colony near Chari Saduwal Tank	87/D	26.3.09

District Police Officer,
Dera Ismail Khan

OFFICE OF THE DISTRICT POLICE OFFICER, DERA ISMAIL KHAN

No. 4707-09 / dated DIKhan the 30-4 - /2009

Copies of above are submitted to the:-

- 1. Provincial Police Officer, NWFP, Peshawar for favour of information, please.
- 2. Attd: Inspector General of Police, Investigation, NWFP, Peshawar along with two spare copies of Notification for publication please.
- 3. Regional Police Officer, DIKhan for favour of information w/r to his office Endst: No. quoted above. One spare copy of Notification is enclosed herewith please.

SPP/EC

[Handwritten signature]
DPO Dera Ismail Khan

District Police Officer,
Dera Ismail Khan

POLICE DEPARTMENT

DIKHAN DISTRICT

FOR PUBLICATION IN THE KPK, GAZETTE
PART-II

ORDER PASSED BY THE DISTRICT POLICE OFFICER DERA ISMAIL KHAN.

REVISED NOTIFICATION

Dated DIKhan the 21-05-2012

No. 1175-97 / APPOINTMENT AS 17/SI - This office Notification issued vide No. 4765-09, dated 30.04.2009 so far it relates to appointment of newly recruited PASIs on the recommendation of KPK Public Service Commission and approved by PPO Khyber Pakhtunkhwa, Peshawar vide letter No. 185973-01, dated 12.02.2009 & No. 568751/P-II, dated 28.02.2009 against 25% quota reserved for direct appointment. The following candidates have been approved for appointment as probationer ASIs in Police Department on three years probation period in BPS-9 (3820-230-10720) along with usual non-subsidized allowances from the date noted against each their names vide RPO Police, DIKhan Fndst: No. 1164-65/ES, dated 06.04.2009 is hereby revised and their date of appointment has been reconsidered from the date of their arrival for duty at Police Lines instead of Medical Fitness.

Sr	Name & Address	Range Number Allotted	Previous Date of appointment	Present date of appointment's
1	Narayan Parvez s/o Gulam Qasim 13 Street No. 01, Nai Abadi near Taj Mahal Colony Moh: Garhi Nasirpur Dera Ismail Khan.	87/D	26.03.2009	11.04.2009
2	Mohaj Sikandar Yar Khan s/o Mohajdar Yar Khan r/o Yar House Street Bannu Road DIKhan	88/D	07.03.2009	14.04.2009
3	Faiz Wazir s/o Abdul Wahab r/o House No. 25 Street-1 Sector-1, Phase-III Dargat Abad Peshawar.	89/D	24.02.2009	16.04.2009

District Police Officer,
Dera Ismail Khan

OFFICE OF THE DISTRICT POLICE OFFICER, DERA ISMAIL KHAN

No. 1175-97 Allotted DIKhan the 21-05-2012

Copies of above are submitted to the:-

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar, for favour of information, please.
2. Addl: Inspector General of Police - Investigation, Khyber Pakhtunkhwa Peshawar alongwith two spare copies of Notification for publication please.
3. Dy: Inspector General of Police, DIKhan Range, DIKhan for favour of information w/t to his office Encl: No. quoted above. One spare copy of Notification is enclosed herewith please.

Seen/EC

District Police Officer,
Dera Ismail Khan

21/05/2012

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SENIORITY LIST OF OFFG. SUB INSPECTORS AND CONFIRMED ASSISTANT SUB INSPECTORS ON LIST 'E' AS IT STOOD ON 31.12.2012

NOTIFICATION NO 555 RES. Seniority List - The Seniority List of Offg. Sub Inspectors/ Confirmed Assistant Sub Inspectors on List 'E' of D.I.Khan Region Police as it stood on 31.12.2012 is hereby published for information to all concerned

S#	Names & Number	Date of Birth	Date of Entitlement	Date of entry to list 'E'	Promotion as Offg. SI	Education	Remarks
1	OSI Saqaulah No. 17/D	05.04.1955	14.07.1973	30.11.2004	08.03.2007	Matric	—
2	OSI Ghazanfar Ali No. 44/D	10.05.1955	27.08.1974	30.11.2004	03.03.2007	Matric	—
3	OSI Faridullah No. 37/D	01.06.1954	01.12.1972	30.11.2004	05.03.2007	Matric	—
4	OSI Imam Muhammad No. 41/D	11.10.1951	21.03.1971	30.11.2004	09.03.2007	7th	—
5	OSI Muhammad Iqbal No. 47/D	25.06.1955	01.09.1975	30.11.2004	20.04.2007	9th	—
6	OSI Muhammad Ashraf, No 54/D	05.02.1955	23.12.1978	01.01.2007	16.05.2007	F.A	—
7	OSI Ghulam Bashir, No.55/D	01.01.1957	12.04.1975	01.01.2007	11.05.2007	Matric	—
8	OSI Haroon-ul-Fashid, No.11/D	01.04.1957	20.03.1975	08.03.2007	09.03.2007	Matric	—
9	OS. Alish Wasaya, No.56/D	11.01.1957	22.09.1975	01.01.2007	11.09.2007	Matric	—
10	OSI Ghulam Khan, No.57/D	15.05.1955	17.10.1975	01.01.2007	27.10.2007	Matric	—
11	OSI Mazhar Hussain Shah, 58/D	01.06.1956	13.03.1979	01.01.2007	03.11.2007	Matric	—
12	OSI Muhammad Nawaz, 59/D	07.02.1955	21.02.1976	01.01.2007	26.10.2007	Matric	—
13	OSI Muhammad Riaz, 81/D	01.04.1955	09.07.1975	01.01.2007	27.10.2007	Matric	—
14	OSI Inayatullah, 82/D	10.10.1954	14.10.1975	01.01.2007	27.10.2007	Matric	—
15	OSI Muhammad Hanif, 63/D	12.02.1957	30.10.1975	01.01.2007	27.10.2007	Matric	—
16	OSI Alish Nawaz, 64/D	08.06.1958	02.09.1976	01.01.2007	27.10.2007	M.A/LLB	—
17	OSI Amir Muhammad Faqir, 67/D	22.08.1958	10.04.1976	01.01.2007	27.10.2007	Matric	—
18	OSI Shah Nawaz, 45/D	15.05.1958	03.06.1976	01.06.2007	09.11.2007	Matric	—
19	OSI Abdullah Khan, 68/D	12.03.1958	03.06.1976	01.06.2007	05.11.2007	Matric	—
20	OSI Fazil Khan, 8/D	05.07.1957	03.04.1976	24.10.2007	05.11.2007	Matric	—
21	OSI Abdul Qayyum, 71/D	09.05.1955	01.09.1975	24.10.2007	08.03.2008	9th	—
22	OSI Mira Jan, 72/D	24.07.1954	27.07.1973	24.10.2007	29.02.2008	Matric	—
23	OSI Shan Nawaz, 73/D	22.06.1956	15.09.1975	24.10.2007	17.04.2008	Matric	—
24	OSI Faizullah, 74/D	10.02.1956	20.03.1976	24.10.2007	15.05.2008	Matric	—
25	OSI Abdul Majeed, 75/D	03.06.1956	18.11.1976	24.10.2007	03.05.2008	Matric	—
26	OSI Muhammad Hashim, 79/D	12.06.1959	13.02.1980	19.05.2008	05.08.2008	Under Matric	—
27	OSI Rustam Khan, 80/D	13.04.1958	20.12.1976	19.05.2008	13.12.2008	Under Matric	—
28	OSI Shama Jan, 81/D	03.12.1959	28.09.1978	19.05.2008	15.12.2008	Matric	—
29	OSI Sabir Shah, 14/D	05.10.1958	27.09.1978	25.07.2008	04.12.2008	F.A	—
30	OSI Abdul Hamid, 15/D	10.05.1956	24.11.1975	25.07.2008	14.12.2008	Matric	—
31	OSI Amir Abdullah, 20/D	07.02.1958	23.11.1961	25.07.2008	04.02.2009	Matric	—
32	OSI Alish Zameer, 32/D	01.03.1956	28.02.1980	25.07.2008	01.03.2009	Matric	—
33	OSI Saqir Hussain, 82/D	05.03.1960	19.01.1973	25.07.2008	21.02.2009	F.A	—

[Signature]
 Dy. Inspector General of Police
 D.I.Khan Range D.I.Khan

1. Mr. A. H. Khan
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 3. Mr. A. H. Khan
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 33. Mr. A. H. Khan

34	OSI Maza Mir, 9/D	31.01.1957	08.09.1979	31.01.2009	21.05.2009	Matric	
35	OSI Shah Jshan, 12/D	25.06.1955	31.10.1975	01.01.2009	25.06.2009	9th	
36	OSI Maita Hussain, 15/D	08.04.1954	02.04.1979	01.01.2009	25.06.2009	Matric	
37	OSI Faiz Kaleem, 19/D	06.09.1960	01.04.1990	31.01.2009	02.08.2009	Matric	
38	OSI Ghulam Yasin, 24/D	04.02.1960	25.01.1985	01.01.2009	06.08.2009	Matric	
39	OSI Muhammad Nawaz, 34/D	05.01.1961	30.01.1979	01.01.2009	07.08.2009	9th	
40	OSI Ghulam Kazim, 35/D	15.04.1960	18.01.1979	01.01.2009	12.08.2009	9th	
41	OSI Abdul Latif, 34/D	18.10.1960	06.03.1979	01.01.2009	07.08.2009	Matric	
42	OSI Inayatullah, 35/D	10.03.1960	05.03.1980	01.01.2009	06.08.2009	Matric	
43	OSI Khalid Mahmood, 35/D	15.06.1971	29.12.1991	01.01.2009	17.08.2009	F.A	
44	OSI Mir Ajab, 23/D	11.10.1956	23.12.1978	31.07.2009	08.09.2009	Matric	
45	OSI Alla-ud-Din, 29/D	06.05.1960	01.06.1978	31.07.2009	08.09.2009	F.A	
46	OSI Sajawal Khan, 30/D	01.01.1960	27.08.1978	31.07.2009	08.09.2009	Matric	
47	OSI Fazal Hussain Shah, 38/D	01.01.1958	09.04.1978	31.07.2009	09.09.2009	Matric	
48	OSI Saadullah Khan, 38/D	01.08.1958	07.12.1979	31.07.2009	10.09.2009	Matric	
49	OSI Mir Aslam, 100/D	01.01.1958	06.07.1976	31.07.2009	11.12.2009	Matric	
50	OSI Allah Dad, 97/D	21.01.1959	07.11.1978	31.07.2009	12.12.2009	Matric	
51	OSI Muhammad Nawaz, 99/D	01.05.1960	27.05.1978	31.07.2009	14.12.2009	Matric	
52	OSI Muhammad Iqbal, 18/D	19.04.1978	10.10.2006	01.02.2010	23.06.2011	BA/LLB	
53	OSI Tariq Saleem, 22/D	31.03.1980	10.10.2006	01.02.2010	23.06.2011	M.Sc	
54	OSI Sadiqullah, 53/D	01.08.1969	29.12.2006	01.02.2010	23.06.2011	M.A	
55	OSI Syed Asghar Ali Shah, 51/D	03.01.1974	29.12.2006	01.02.2010	14.12.2012	M.A	
56	OSI Saif-ur-Rehman, 31/D	15.10.1975	29.12.2006	01.02.2010	14.12.2012	M.A	
57	OSI Muhammad Alamgir, 49/D	06.10.1980	29.12.2006	01.02.2010	14.12.2012	M.A	
58	OSI Muhammad Imran, 52/D	02.02.1982	29.12.2006	01.02.2010	14.12.2012	B.A	
59	OSI Feza: Rahim, 33/D	10.03.1963	02.03.1982	15.03.2010	14.12.2012	Matric	
60	OSI Mumtaz Khan, 104/D	01.06.1965	26.12.1987	20.07.2010	14.12.2012	B.A	
61	OSI Syed Saqheer Abbas Shah, 42/D	09.04.1984	05.10.2007	06.10.2010	14.12.2012	F.A	
62	ASI Abdullah Khan, 6/D	20.07.1961	05.04.1981	15.06.2011	-	Matric	
63	ASI Allah Nawaz, 7/D	18.08.1956	07.03.1975	15.06.2011	-	F.A	
64	ASI Liaqat Ali, 50/D	10.01.1959	21.11.1979	15.06.2011	-	F.A	
65	ASI Pervez Hussain, 89/D	15.04.1973	11.10.1993	15.06.2011	-	F.A	
66	ASI Adam Khan, 73/D	09.11.1953	18.11.1976	15.06.2011	-	Matric	
67	ASI Inamullah, 98/D	09.01.1957	01.07.1989	15.06.2011	-	Matric	
68	ASI Abdul Ghani, 107/D	01.03.1957	21.10.1975	15.06.2011	-	Matric	
69	ASI Ghulam Farid, 109/D	10.06.1960	25.09.1980	15.06.2011	-	Matric	
70	ASI Shah Nadir, 110/D	10.09.1957	14.10.1975	15.06.2011	-	Matric	
71	ASI Muhammad Yaqoob, 111/D	01.12.1956	20.10.1975	15.06.2011	-	9th	
72	ASI Muhammad Ashraf, 112/D	05.04.1960	18.04.1978	15.06.2011	-	9th	
73	ASI Ebad Wazir, 89/D	27.01.1982	24.02.2009	25.02.2012	-	MA/LLB	On deputation to CCP Peshawar
74	ASI Minhaj Sikandar Yar Khan, 88/D	19.08.1981	07.03.2009	27.03.2012	-	MBA	
75	ASI Kashif Sattar, 32/D	06.04.1985	14.03.2009	27.03.2012	-	F.Sc	

[Signature]
 Dy. Inspector General of Police
 D.I. Khan Rana D.I. Khan

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76	ASI Muhammad Adnan, 91/D	14.04.1929	14.03.2009	27.03.2012	-	F.Sc
77	AS Fazal-ur-Rehman, 94/D	02.03.1937	19.03.2009	27.03.2012	-	F.A
78	ASI Saleem Parvez, 97/D	01.03.1978	26.03.2009	27.03.2012	-	B.Sc
79	ASI Sharifullah, 93/D	05.02.1951	10.04.2009	11.04.2012	-	F.A
80	ASI Abdul Ghani, 10/D	11.01.1957	29.10.1976	23.04.2012	-	Matric
81	ASI Jan Muhammad, 21/D	07.03.1962	19.02.1981	23.04.2012	-	8th
82	ASI Ghulam Ali, 39/D	12.11.1957	21.06.1976	23.04.2012	-	Matric
83	ASI Said Marjan, 40/D	20.11.1965	26.11.1984	23.04.2012	-	Matric

(MOHAMMAD ALI BABA KHEL) PSP
Deputy Inspector General of Police,
Dera Ismail Khan Region

No. 556-62/ES dated D.I Khan the // - 02 - 2013

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

- 1 The Additional Inspector General of Police, Investigation, Khyber Pakhtunkhwa, Peshawar.
Two spare copies of the notification are enclosed for publication.
- 2 The Addtl. Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawar
- 3 The Capital City Police Officer, Peshawar
- 4-5 The District Police Officers, D.I. Khan & Tank.
- 6-7 The Superintendent of Police, Investigation, D.I. Khan & Tank

They are requested to please inform all the Police Officers serving under their command.
Any officer who have objection on his seniority he should submit his representation within
one month after the issue of the list

(MOHAMMAD ALI BABA KHEL) PSP
Deputy Inspector General of Police,
Dera Ismail Khan Region

30	ASI Muhammad Raza, 491	16.11.1986	05.04.1950	20.09.2002	25.11.2007
	ASI Amjad Hussain, 50		21.08.1928	23.06.2003	

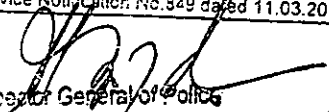
NOTIFICATION NO. 882

SENIORITY LIST OF OFFG: SUB INSPECTORS AND CONFIRMED ASSISTANT SUB INSPECTORS ON LIST 'E' AS IT STOOD ON 31.12.2013

ES. Seniority List: - The Seniority List of Offg: Sub Inspectors/ Confirmed Assistant Sub Inspectors on List 'E' of D.I.Khan Region Police as it stood on 31.12.2013 is hereby published for information to all concerned

S#	Names & Number	Date of Birth	Date of Enlistment	Date of entry to list "E"	Promotion as Offg: SI	Education	Remarks
1	Inspector (Adhoc) Sanauliah No.1/D	05.04.1955	14.07.1973	30.11.2004	08.03.2007		
2	OSI Ghazanfar Ali No. 44 / D	10.06.1955	27.03.1974	30.11.2004	08.03.2007	Matric	
3	Inspector (Adhoc) Faridullah No.37/D	01.06.1954	01.12.1972	30.11.2004	08.03.2007	Matric	
4	OSI Imam Muhammad No. 41 / D	11.10.1954	21.03.1971	30.11.2004	08.03.2007	Matric	
5	OSI Muhammad Iqbal No. 47 / D	25.06.1955	01.09.1975	30.11.2004	08.03.2007	7th	
6	OSI Muhammad Ashraf, No.54/D	05.02.1955	23.12.1978	01.01.2007	26.04.2007	9th	
7	OSI Ghulam Bashir, No.55/D	01.01.1957	12.04.1976	01.01.2007	18.05.2007	F.A	
2	OSI Haroon-ul-Rashid, No.11/D	01.04.1957	20.03.1975	08.03.2007	11.05.2007	Matric	
9	OSI Allah Wasaya, No.56/D	11.01.1957	22.09.1975	01.01.2007	08.03.2007	Matric	
10	OSI Ghulam Khan, No.57/D	15.05.1955	17.10.1975	01.01.2007	11.09.2007	Matric	
11	OSI Mazhar Hussain Shah, 58/D	01.06.1956	13.03.1979	01.01.2007	27.10.2007	Matric	
12	OSI Muhammad Nawaz, 59/D	07.02.1955	21.02.1976	01.01.2007	03.11.2007	Matric	
13	OSI Muhammad Riaz, 61/D	01.04.1955	09.07.1976	01.01.2007	26.10.2007	Matric	
14	OSI Inayatullah, 62/D	10.10.1954	14.10.1975	01.01.2007	27.10.2007	Matric	
15	OSI Muhammad Hanif, 63/D	12.02.1957	30.10.1975	01.01.2007	27.10.2007	Matric	
16	OSI Allah Nawaz, 64/D	08.06.1958	02.09.1976	01.01.2007	27.10.2007	Matric	
17	OSI Amir Muhammad Faqir, 67/D	22.08.1956	10.04.1975	01.01.2007	27.10.2007	M.A/ LLB	
18	OSI Shah Nawaz, 45/D	15.05.1958	03.06.1976	01.06.2007	27.10.2007	Matric	
19	OSI Abdullah Khan, 68/D	12.03.1958	03.06.1976	01.06.2007	09.11.2007	Matric	
20	OSI Fazil Khan, 8/D	05.07.1957	08.04.1976	24.10.2007	06.11.2007	Matric	
21	OSI Abdul Qayyum, 71/D	09.05.1955	01.09.1975	24.10.2007	08.11.2007	Matric	
22	OSI Mira Jan, 72/D	24.07.1954	27.07.1973	24.10.2007	09.03.2008	9th	
23	OSI Shah Nawaz, 73/D	22.06.1956	15.09.1975	24.10.2007	29.02.2008	Matric	
24	OSI Abdul Majeed, 75/D	03.06.1956	18.11.1976	24.10.2007	17.04.2008	Matric	
25	OSI Muhammad Hashim, 79/D	12.06.1959	13.02.1980	19.05.2008	08.05.2008	Matric	
26	OSI Rustam Khan, 80/D	13.04.1958	20.12.1976	19.05.2008	05.08.2008	Under Matric	Reverted to the rank of ASI
27	OSI Shama Jan, 81/D	03.12.1959	28.09.1978	19.05.2008	13.12.2008	Under Matric	
28	OSI Sabir Shah, 14/D	06.10.1958	27.09.1978	25.07.2008	16.12.2008	Matric	
29	OSI Abdul Hamid, 15/D	10.05.1956	24.11.1976	25.07.2008	04.12.2008	F.A	
	OSI Bakht, 20/D	07.02.1958	23.11.1981	25.07.2008	14.12.2008	Matric	Retired from service w.e.from 01.03.14
	OSI Bakht, 62/D	01.03.1955	28.02.1980	25.07.2008	04.02.2008	Matric	
	OSI Hussain, 83/D	05.03.1960	16.01.1979	25.07.2008	01.03.2009	Matric	
				25.07.2008	21.02.2009	F.A	

35	OSI Muzza Mir 9/D	01.01.1957	03.09.1979	01.01.2009	01.08.2009		
36	OSI Shah Jahan 11/D	23.05.1953	31.10.1975	31.01.2009	15.06.2009	Matric	
38	OSI Mansur Hussain 18/D	03.04.1954	02.04.1979	01.01.2009	25.06.2009	9th	
39	OSI Farid Kaleem 19/D	06.09.1960	01.04.1980	01.01.2009	25.06.2009	Matric	
37	OSI Ghulam Yasir 24/D	04.02.1950	29.01.1985	01.01.2009	28.08.2009	Matric	Reverted to the rank of ASI
38	OSI Muhammad Nawaz 24/D	05.01.1951	30.01.1979	01.01.2009	08.09.2009	Matric	
39	OSI Gulam Kazim 35/D	15.04.1960	13.01.1979	01.01.2009	07.03.2009	9th	
40	OSI Abdul Latif 34/D	16.10.1960	06.03.1979	01.01.2009	12.03.2009	9th	
41	OSI Mansurullah 25/D	10.03.1960	05.03.1980	01.01.2009	07.08.2009	Matric	Reverted to the rank of ASI
42	OSI Mir Asif 23/D	11.10.1953	23.12.1978	31.07.2009	05.03.2009	Matric	Reverted to the rank of ASI
43	OSI Mansur Din 25/D	06.05.1960	01.03.1978	31.07.2009	08.09.2009	Matric	Retired from service w.e. from 01.03.14
44	OSI Saleem Khan 50/D	01.01.1950	27.08.1978	31.07.2009	08.09.2009	F.A	
45	OSI Fazal Hussain Shah 65/D	01.01.1956	09.04.1976	31.07.2009	08.09.2009	Matric	
46	OSI Saadullah Khan 36/D	01.03.1953	07.12.1973	31.07.2009	03.09.2009	Matric	
47	OSI Mir Aslam 100/D	01.01.1958	06.07.1976	31.07.2009	10.09.2009	Matric	
48	OSI Asif Durrani 97/D	21.01.1959	07.11.1978	31.07.2009	11.12.2009	Matric	
49	OSI Muhammad Nawaz 39/D	01.05.1960	27.05.1978	31.07.2009	12.12.2009	Matric	
50	OSI Muhammad Iqbal 18/D	19.04.1973	10.10.2006	31.07.2009	14.12.2009	Matric	Reverted to the rank of ASI
51	OSI Saifullah 51/D	01.03.1969	29.12.2006	01.02.2010	23.06.2011	B.A/LLB	
52	OSI Saifullah Rahman 31/D	15.10.1975	29.12.2006	01.02.2010	23.06.2011	M.A	
53	OSI Muhammad Alamgir 49/D	06.10.1953	29.12.2006	01.02.2010	14.12.2012	M.A	
54	OSI Muhammad Imran 52/D	02.02.1932	29.12.2006	01.02.2010	14.12.2012	M.A	Reverted to the rank of ASI
55	OSI Faraz 38/D	10.03.1953	02.03.1982	15.03.2010	14.12.2012	B.A	
56	OSI Munir Khan 104/D	01.06.1955	26.12.1987	20.07.2010	14.12.2012	Matric	
57	OSI Syed Sagheer Abbas Shah 42/D	09.04.1984	05.10.2007	05.10.2010	14.12.2012	B.A	
58	OSI Abdul Karim Khan 0/D	20.07.1961	05.04.1981	15.06.2011	14.12.2012	F.A	
59	OSI Arif Nawaz 7/D	18.05.1963	07.03.1975	15.06.2011	16.09.2013	Matric	
60	OSI Faraz Hussain 69/D	19.01.1959	21.11.1973	15.06.2011	26.12.2013	F.A	
61	OSI Adam Khan 78/D	15.04.1973	11.10.1993	15.06.2011	25.09.2013	F.A	
62	OSI Mansurullah 98/D	09.11.1958	18.11.1976	15.06.2011	25.12.2013	F.A	
63	OSI Abdul Ghani 107/D	09.01.1967	01.07.1990	15.06.2011	25.09.2013	Matric	
64	OSI Ghulam Farid 109/D	01.03.1957	21.10.1975	15.06.2011	26.12.2013	Matric	
65	OSI Shah Nadir 110/D	10.06.1960	23.09.1980	15.06.2011	25.12.2013	Matric	
66	OSI Muhammad Yaqub 111/D	10.09.1957	14.10.1975	15.06.2011	26.12.2013	Matric	
67	OSI Muhammad Ashraf 112/D	01.12.1956	20.10.1975	15.06.2011	26.12.2013	Matric	
68	OSI Saleem Parvez 87/D	05.04.1960	18.04.1978	15.06.2011	26.12.2013	9th	
69	OSI Mirza Sikandar Yar Khan 68/D	01.03.1978	19.02.2009	20.02.2012	-	9th	Reverted as HC and removed from List 'E'
70	OSI Mirza Sikandar Yar Khan 68/D	19.08.1981	19.02.2009	20.02.2012	-	B.Sc	Revised Seniority vide Notification No.849 dated 11.03.2014
71	OSI Asif Wazir 85/D (on deputation to CCP)	27.01.1932	19.02.2009	20.02.2012	-	MBA-IT/LLB	Revised Seniority vide Notification No.849 dated 11.03.2014
72	OSI Muhammad Adnan 91/D	14.04.1969	07.03.2009	08.03.2012	-	MA/LLB	Revised Seniority vide Notification No.849 dated 11.03.2014
73	OSI Shahzad 83/D	05.02.1981	07.03.2009	08.03.2012	-	F.Sc	Revised Seniority vide Notification No.849 dated 11.03.2014
74	OSI Shahzad 83/D	05.02.1981	07.03.2009	08.03.2012	-	F.A	Revised Seniority vide Notification No.849 dated 11.03.2014


 Dy. Inspector General of Police
 D.I. Khan Range D.I. Khan

7. Director ACE Khyber Pakhtu

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74	ASI Kasim Sattar, 92/D	06.04.1986	07.03.2009	08.03.2012	-	F.Sc	Revised Seniority vide Notification No 849 dated 11.03.2014
75	ASI Fazal-Ur-Rahman, 94/D	02.03.1987	07.03.2009	08.03.2012	-	F.A	Revised Seniority vide Notification No 849 dated 11.03.2014
76	ASI Nageeb Ullah No.95/D	10.08.1989	07.03.2009	08.03.2012	-	F.A	Revised Seniority vide Notification No 849 dated 11.03.2014
77	ASI Abdul Ghan, 10/D	11.01.1957	23.10.1976	23.04.2012	-	Matric	
78	ASI Jan Muhammad, 21/D	07.03.1962	19.02.1981	23.04.2012	-	9th	
79	ASI Ghulam Ali, 39/D	12.11.1957	21.06.1976	23.04.2012	-	Matric	
80	ASI Saad Marjan, 40/D	20.11.1965	23.11.1984	23.04.2012	-	Matric	Reverted as HC and removed from List 'E'
81	ASI Muhammad Ramzan, 2/D	07.04.1977	01.09.1995	13.03.2013	-	Matric	On deputation to PTC Hangu
82	ASI Muhammad Tahir, 101/D	13.10.1980	17.03.2010	18.03.2013	-	F.Sc	
83	ASI Sabir Hussain, 102/D	02.04.1981	17.03.2010	18.03.2013	-	M.A	
84	ASI Shah Muhammad, 103/D	03.09.1976	18.03.2010	18.03.2013	-	M.A	
85	ASI Zafar Ali Shah, 43/D	01.01.1980	12.08.2010	13.08.2013	-	B.A	
86	ASI Fahim Mumtaz, 70/D	01.03.1991	12.08.2010	13.08.2013	-	F.Sc	



 (ABDUL GHAFOOR AFRIDI)
 PSP/PPM

Deputy Inspector General of Police,
 Dera Ismail Khan Region

No. 883-89 /ES dated D.I.Khan the 12-03-2014
 Copy of above is forwarded for information & necessary action to the:-

- 1 The Additional Inspector General of Police, Investigation, Khyber Pakhtunkhwa, Peshawar.
Two spare copies of the notification are enclosed for publication.
- 2 The Commandant, Police Training College, Hangu
- 3 The Capital City Police Officer, Peshawar
- 4-5 The District Police Officers, D.I.Khan & Tank.
- 6-7 The Superintendent of Police, Investigation, D.I.Khan & Tank

They are requested to please inform all the Police Officers serving under their command.
 Any officer who have objection on his seniority he should submit his representation within
 one month after the issue of the list


 (ABDUL GHAFOOR AFRIDI)
 PSP, PPM

Deputy Inspector General of Police,
 Dera Ismail Khan Region

- (d) Inspector General of Police for the posts of Deputy Superintendents of Police;
- (e) [△]Chairman of the Technical Education and Vocational Training Authority for Government employees transferred to the Technical Education and Vocational Training Authority; and
- (f) Any other authority, prescribed as appointing authority, for posts in BS-16, in the relevant service/recruitment rules.

Annex - 0
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(iv) BS-1 to 16 Respective authorities exercising such powers immediately before the commencement of these rules or such authorities as may hereafter be empowered.

7. (1) A person appointed to a post in a grade against a substantive vacancy shall remain on probation for a period of two years, if appointed by initial recruitment, and for a period of one year, if appointed otherwise; provided that the appointing authority may extend the period of probation by a further period not exceeding two years in all.

Explanation— Officiating service and service spent on deputation to a corresponding or a higher post may be allowed to count towards the period of probation.

(2) No person shall be confirmed in a post unless he has successfully completed such training and passed such departmental examination as may be prescribed.

(3) If no orders have been made by the day following the completion of the initial probationary period, the period of probation shall be deemed to have been extended.

(4) Subject to the provisions of sub-rule (2) above, if no orders have been made by the day on which the maximum period of probation expires, the probationer shall be deemed to have been confirmed in his appointment from the date on which the period of probation was last extended or may be deemed to have been so extended.

*Provided that in case of grant of extraordinary leave during the period of probation of two years, the name of the person will be removed from the seniority list and placed on a static list with no claim to promotion, seniority or confirmation for the period he remained on EOL.

(5) A probationer, who has satisfactorily completed his period of probation against a substantive vacancy, shall be confirmed with effect from the date of his continuous appointment in such a vacancy:

[△]The words "Chief Operating Officer" substituted with the word "Chairman" vide Notification No. SOR-III(S&GAD)1-15/2003(P) dated 17.10.2011.

*Proviso added, after Rule 7(4) vide Notification No. SOR.III-2-52/99 dated 20.11.2001.

Provided that where the period of his probation has been extended under the provisions of sub rule (1) of this rule, the date of confirmation shall, subject to the other provisions of this rule, be the date on which the period of a probation was last extended.

*7-A. Lien. - Notwithstanding anything in any other rules, a confirmed civil servant shall acquire lien against the substantive post held by him when he is relieved as a consequence of his selection against some other post, cadre or service in the service of Pakistan, and he shall retain his lien in the relieving department until he is confirmed in the said other post, cadre or service or for a maximum period of three years whichever is earlier and the said period of lien shall in no case be extended.

8. The seniority inter se of persons appointed to posts in the same grade in a functional unit shall be determined:

(1) (a) In the case of persons appointed by initial recruitment, in accordance with the order of merit, assigned by the selection authority:

Provided that the persons, selected for appointment to the grade in an earlier selection shall rank senior to the persons selected in a later selection;

Provided further that for the purpose of determination of inter se seniority of persons selected through the Combined Competitive Examination, marks obtained by the persons in the Combined Competitive Examination, evaluation marks obtained by the persons in training and marks obtained in the final passing out examination conducted by the Commission shall have weightage as may be prescribed.

(b) In the case of persons appointed otherwise, with reference to the dates of their continuous appointment in the grade; provided that if the date of continuous appointment in the case of two or more persons appointed to the grade is the same, the older if not junior to the younger in the next below grade, shall rank senior to the younger person.

Explanation I- If a person junior in a lower grade is promoted to a higher grade on ad hoc basis, in the public interest, even though continuing later permanently in the higher grade, it would not adversely affect the interest of his seniors in the fixation of his seniority in the higher grade.

Explanation II- If a person junior in a lower grade is promoted to higher grade by superseding his senior and subsequently the latter is also promoted, the promoted first shall rank senior to the one promoted subsequently.

Explanation III- Subject to the provisions of rule 14 of these rules, a junior appointed to a higher grade shall be deemed to have superseded his senior only if both the junior and the senior were considered for the higher grade and the junior was appointed in preference to the senior.

* Added vide Notification No. SOR-III(S&GAD)1-25/2002 dated 03.01.2011.

* Sub-rule (1), paragraph (a) substituted vide Notification No. SOR-III(S&GAD)1-12/2000(P) dated 17.05.2012. (History of amendment is available at page 22).

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Service Appeal No. 1156/2013 (Salcem Pervez Vs Govt. of KP Petition No. 223/229-2019 Minhaj Sikandar Yar Khan Vs. Police Department)

Revised Seniority List "E" stood on 31.12.2012

1	2	3	4			5	6	7	8	9	10			11	12	13	14	15											
			Names & Number	Date of Birth	Age as it stood on 31/12/2012 YY/MM/DD						Date of Appointment as Constable	Date of Promotion as HC	Existing Date of Confirmation as HC						Revised Date of Confirmation as HC	Date of entry into List D	Date of Appointment as ASI		Existing Date of Confirmation as ASI	Revised Date of Confirmation as ASI	Existing Date of entry into List "E"	Proposed Date of Entry into List E	Existing Date of Promotion as SI		
					Y																M	D						By way of promotion (Rankers)	By way of Direct Appointment (Probationers)
										De facto		De Jure																	
1.	OSI Sanaulah No/1/D	05/04/1955	57	8	26	14/07/1973	22/01/1982	Nil	22/01/1984	01.04.1987	09/10/1997	NA	NA	01/05/2004	09/10/1999	30/11/2004	10/10/1999	08/03/2007											
2.	OSI Faridullah No/37/D	01/06/1954	58	6	30	01/12/1972	15/09/1982	Nil	15/09/1984	01.10.1987	28/10/1997	NA	NA	01/05/2004	28/10/1999	30/11/2004	29/10/1999	08/03/2007											
3.	OSI Ghazanfar Ali No/ 44 / D	10/06/1955	57	6	21	27/08/1974	26/01/1982	Nil	26/01/1984	01.10.1987	20/11/1997	NA	NA	01/05/2004	20/11/1999	30/11/2004	21/11/1999	08/03/2007											
4.	OSI Imam Muhammad No/ 41 / D	11/10/1954	58	2	20	21/03/1971	16/08/1982	Nil	16/08/1984	01.10.1987	11/12/1997	NA	NA	01/05/2004	11/12/1999	30/11/2004	12/12/1999	08/03/2007											
5.	OSI Muhammad Iqbal No/ 47 / D	25/06/1955	57	6	6	01/09/1975	28/09/1984	Nil	28/09/1986	01.04.1989	10/01/1998	NA	NA	01/05/2004	10/01/2000	30/11/2004	11/01/2000	26/04/2007											
6.	OSI Muhammad Ashraf, No/54/D	05/02/1955	57	10	26	23/12/1978	28/03/1987	Nil	28/03/1989	01.10.1989	25/04/1998	NA	NA	01/12/2006	25/04/2000	01/01/2007	26/04/2000	16/05/2007											
7.	OSI Ghulam Bashir, No/55/D	01/01/1957	55	11	30	12/04/1976	22/02/1987	Nil	22/02/1989	01.10.1989	03/07/2000	NA	NA	01/12/2006	03/07/2002	01/01/2007	04/07/2002	11/05/2007											
8.	OSI Haroon-ul-Rashid, No/11/D	01/04/1957	55	8	30	20/03/1975	02/04/1985	Nil	02/04/1987	01.10.1989	03/07/2000	NA	NA	01/01/2007	03/07/2002	08/03/2007	04/07/2002	08/03/2007											
9.	OSI Allah Wasaya, No/56/D	11/01/1957	55	11	20	22/09/1975	01/11/1984	Nil	01/11/1986	01.10.1989	26/11/2001	NA	NA	01/12/2006	26/11/2003	01/01/2007	27/11/2003	11/09/2007											
10.	OSI Mazhar Hussain Shah, 58/D	01/06/1956	56	6	30	18/03/1979	10/02/1987	Nil	10/02/1989	01.10.1990	26/11/2001	NA	NA	01/12/2006	26/11/2003	01/01/2007	27/11/2003	03/11/2007											
11.	OSI Muhammad Riaz, 61/D	01/01/1955	57	8	30	09/07/1976	12/07/1985	Nil	12/07/1987	01.04.1991	26/11/2001	NA	NA	01/12/2006	26/11/2003	01/01/2007	27/11/2003	27/10/2007											
12.	OSI Muhammad Hanif, 63/D	12/02/1957	55	10	19	30/10/1975	01/03/1988	Nil	01/03/1988	01.10.1991	26/11/2001	NA	NA	01/12/2006	26/11/2003	01/01/2007	27/11/2003	27/10/2007											
13.	OSI Muhammad Nawaz, 59/D	07/02/1955	57	10	24	21/02/1976	02/04/1985	Nil	02/04/1987	01.10.1990	27/11/2001	NA	NA	01/12/2006	27/11/2003	01/01/2007	28/11/2003	26/10/2007											
14.	OSI Inayatullah, 62/D	10/10/1954	58	2	21	14/10/1975	02/04/1985	Nil	02/04/1987	01.04.1991	27/11/2001	NA	NA	01/12/2006	27/11/2003	01/01/2007	28/11/2003	27/10/2007											
15.	OSI Allah Nawaz, 64/D	08/06/1958	54	6	23	02/09/1976	20/02/1989	Nil	20/02/1991	01.10.1992	01/12/2001	NA	NA	01/12/2006	01/12/2003	01/01/2007	02/12/2003	27/10/2007											
16.	OSI Ghulam Khan, No/57/D	16/05/1955	57	7	15	17/10/1975	02/04/1985	Nil	02/04/1987	01.04.1990	02/12/2001	NA	NA	01/12/2006	02/12/2003	01/01/2007	03/12/2003	27/10/2007											
17.	OSI Amir Muhammad Faqir, 67/D	22/08/1956	56	4	9	10/04/1976	06/06/1987	Nil	06/06/1989	01.10.1992	16/12/2001	NA	NA	01/12/2006	16/12/2003	01/01/2007	17/12/2003	27/10/2007											
18.	OSI Shah Nawaz, 45/D	15/05/1958	54	7	16	03/06/1976	05/05/1991	Nil	05/05/1993	01.10.1992	18/01/2002	NA	NA	01/04/2007	18/01/2004	01/06/2007	19/01/2004	09/11/2007											
19.	OSI Abdullah Khan, 68/D	12/03/1958	53	9	19	03/06/1976	09/12/1987	Nil	09/12/1989	01.10.1992	24/01/2002	NA	NA	01/04/2007	24/01/2004	01/06/2007	25/01/2004	06/11/2007											
20.	OSI Fazil Khan, 8/D	05/07/1957	55	5	26	08/04/1976	18/02/1989	Nil	18/02/1991	01.04.1993	25/01/2002	NA	NA	01/10/2007	25/01/2004	24/10/2007	26/01/2004	08/11/2007											
21.	OSI Abdul Qayyum, 71/D	09/05/1955	57	7	22	01/09/1975	14/02/1989	Nil	14/02/1991	01.10.1993	27/07/2002	NA	NA	01/10/2007	27/07/2004	24/10/2007	28/07/2004	09/03/2008											
22.	OSI Mira Jan, 72/D	24/07/1954	58	5	7	27/07/1973	22/07/1989	Nil	22/07/1991	01.10.1993	27/07/2002	NA	NA	10/10/2007	27/07/2004	24/10/2007	28/07/2004	29/02/2008											
23.	OSI Shah Nawaz, 73/D	22/06/1956	56	6	9	15/09/1975	14/02/1989	Nil	14/02/1991	01.04.1994	26/06/2003	NA	NA	01/10/2007	26/06/2005	24/10/2007	27/06/2005	17/04/2008											
24.	OSI Faiz Ullah 74/D	10/02/1956	55	10	21	20/08/1976	14/02/1989	Nil	14/02/1991	01.04.1994	26/06/2003	NA	NA	01/10/2007	26/06/2005	24/10/2007	27/06/2005	15/05/2008											
25.	OSI Abdul Majeed, 75/D	03/06/1956	56	6	28	18/11/1976	04/12/1990	Nil	04/12/1992	01.04.1995	05/07/2003	NA	NA	01/10/2007	05/07/2005	24/10/2007	06/07/2005	08/05/2008											
26.	OSI Muhammad Hashim, 79/D	12/06/1959	53	6	19	13/02/1980	12/04/1991	Nil	12/04/1993	01.04.1996	25/12/2003	NA	NA	01/05/2008	25/12/2005	19/05/2008	26/12/2005	05/08/2008											
27.	OSI Rustam Khan, 80/D	13/04/1958	54	8	18	20/12/1976	26/08/1991	Nil	26/08/1993	01.10.1996	03/01/2004	NA	NA	01/05/2008	03/01/2006	19/05/2008	04/01/2006	13/12/2008											
28.	OSI Shama Jan, 81/D	03/12/1959	53	0	28	28/09/1978	26/08/1991	Nil	26/08/1993	01.10.1996	14/01/2004	NA	NA	01/05/2008	14/01/2006	19/05/2008	15/01/2006	16/12/2008											

Handwritten signature and date: 07/11/2022

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Service Appeal No. 1156/2013 (Saleem Pervez Vs Govt. of KP Petition No. 223/229-2019 Minhaj Sikandar Yar Khan Vs Police Department)

S #	Names & Number	Date of Birth	Age as it stood on 31/12/2012 YY/MM/DD			Date of Appointment as Constable	Date of Promotion as HC	Existing Date of Confirmation as HC	Revised Date of Confirmation as HC	Date of entry into List D	Date of Appointment as ASI			Existing Date of Confirmation as ASI	Revised Date of Confirmation as ASI	Existing Date of entry into List "E"	Proposed Date of Entry into List E	Existing Date of Promotion as SI
			Y	M	D						By way of promotion (Rankers)	By way of Direct Appointment (Probationers)						
												De facto	De Jure					
29.	OSI Sabir Shah, 14/D	06/10/1958	54	2	25	27/09/1978	26/08/1991	Nil	26/08/1993	01.10.1996	29/09/2004	NA	NA	15/07/2008	29/09/2006	25/07/2008	30/09/2006	04/12/2008
30.	OSI Amir Abdullah, 20/D	07/02/1958	54	10	24	23/11/1981	05/10/1994	Nil	05/10/1996	01.10.1996	29/09/2004	NA	NA	15/07/2008	29/09/2006	25/07/2008	30/09/2006	04/02/2008
31.	OSI Abdul Hamid, 15/D	10/05/1956	56	7	21	24/11/1976	26/08/1991	Nil	26/08/1993	01.10.1996	04/10/2004	NA	NA	15/07/2008	04/10/2006	25/07/2008	05/10/2006	14/12/2008
32.	OSI Matla Hussain, 16/D	08/04/1954	58	8	23	02/04/1979	14/05/1992	Nil	14/05/1994	01.04.1997	04/10/2004	NA	NA	15/12/2008	04/10/2006	01/01/2009	05/10/2006	25/06/2009
33.	OSI Allah Bakhsh, 82/D	01/03/1955	57	9	30	28/02/1980	16/09/1993	Nil	16/09/1995	01.04.1997	05/10/2004	NA	NA	15/07/2008	05/10/2006	25/07/2008	06/10/2006	01/03/2009
34.	OSI Muza Mir, 9/D	01/01/1957	55	11	30	08/09/1979	01/09/1992	Nil	01/09/1994	01.04.1997	06/10/2004	NA	NA	15/12/2008	06/10/2006	01/01/2009	07/10/2006	21/06/2009
35.	OSI Bashir Hussain, 83/D	05/03/1960	52	9	28	16/01/1979	06/04/1992	Nil	06/04/1994	01.04.1997	07/10/2004	NA	NA	15/07/2008	07/10/2006	25/07/2008	08/10/2006	21/02/2009
36.	OSI Shah Jehan, 12/D	25/08/1955	57	6	6	31/10/1975	12/11/1991	Nil	12/11/1993	01.04.1997	07/10/2004	NA	NA	15/12/2008	07/10/2006	01/01/2009	08/10/2006	25/06/2009
37.	OSI Ghulam Kazim, 35/D	15/04/1960	52	8	16	18/01/1979	28/07/1994	Nil	28/07/1996	01.10.1997	07/12/2004	NA	NA	15/12/2008	07/12/2006	01/01/2009	08/12/2006	12/08/2009
38.	OSI Ghulam Yasin, 24/D	04/02/1960	52	10	27	28/01/1985	28/07/1994	Nil	28/07/1996	01.10.1997	08/12/2004	NA	NA	15/12/2008	08/12/2006	01/01/2009	09/12/2006	06/08/2009
39.	OSI Muhammad Nawaz, 34/D	05/01/1961	51	11	28	30/01/1979	28/07/1994	Nil	28/07/1996	01.10.1997	20/12/2004	NA	NA	15/12/2008	20/12/2006	01/01/2009	21/12/2006	07/08/2009
40.	OSI Faiz Kaleem, 19/D	06/09/1960	52	3	25	01/04/1980	28/07/1994	Nil	28/07/1996	01.10.1997	27/12/2004	NA	NA	15/12/2008	27/12/2006	01/01/2009	28/12/2006	08/08/2009
41.	OSI Inayatullah, 85/D	10/03/1960	52	9	21	05/03/1980	27/02/1995	Nil	27/02/1997	01.10.1997	10/05/2005	NA	NA	15/12/2008	10/05/2007	01/01/2009	11/05/2007	08/08/2009
42.	OSI Khalid Mehmood 86/D	15/06/1971	40	06	18	29/12/1991	12/06/1995	Nil	12/06/1997	01/05/1998	14/05/2005	N/A	NA	15/12/2008	14/05/2007	01/01/2009	15/05/2007	17/08/2009
43.	OSI Abdul Latif, 84/D	16/10/1960	52	2	15	06/03/1979	28/07/1994	Nil	28/07/1996	01.10.1997	15/05/2005	NA	NA	15/12/2008	15/05/2007	01/01/2009	16/05/2007	07/08/2009
44.	OSI Mir Ajab, 23/D	11/10/1956	56	2	20	23/12/1978	17/10/1994	Nil	17/10/1996	01.05.1998	30/06/2005	NA	NA	01/07/2009	30/06/2007	31/07/2009	01/07/2007	08/09/2009
45.	OSI Alta-ud-Din, 29/D	06/05/1960	52	7	25	01/06/1978	16/09/1993	Nil	16/09/1995	01.05.1998	08/03/2007	NA	NA	01/07/2009	08/03/2009	31/07/2009	09/03/2009	08/09/2009
46.	OSI Sajawal Khan, 60/D	01/01/1960	52	11	30	27/08/1978	27/02/1995	Nil	27/02/1997	01.05.1998	08/03/2007	NA	NA	01/07/2009	08/03/2009	31/07/2009	09/03/2009	08/09/2009
47.	OSI Fazal Hussain Shah, 68/D	01/01/1958	54	11	30	09/04/1976	16/02/1997	Nil	16/02/1999	01.05.1998	08/03/2007	NA	NA	01/07/2009	08/03/2009	31/07/2009	09/03/2009	09/09/2009
48.	OSI Saadullah Khan, 96/D	01/08/1958	54	4	30	07/12/1979	27/07/1995	Nil	27/07/1997	01.05.1998	08/03/2007	NA	NA	01/07/2009	08/03/2009	31/07/2009	09/03/2009	10/09/2009
49.	OSI Mir Aslam, 100/D	01/01/1958	54	11	30	06/07/1978	16/02/1997	Nil	16/02/1999	01.05.1998	08/03/2007	NA	NA	N/A	08/03/2009	31/07/2009	09/03/2009	11/12/2009
50.	OSI Allah Dad, 97/D	21/01/1959	53	11	10	07/11/1978	28/02/1997	Nil	28/02/1999	10.10.1998	08/03/2007	NA	NA	01/07/2009	08/03/2009	31/07/2009	09/03/2009	12/12/2009
51.	OSI Muhammad Nawaz, 99/D	01/05/1960	52	7	30	27/05/1978	16/07/1997	Nil	16/07/1999	10.10.1998	16/07/1997	NA	NA	01/07/2009	08/03/2009	31/07/2009	09/03/2009	14/12/2009
52.	OSI Fazal Rahim, 33/D	10/03/1963	49	9	21	02/03/1982	13/09/1997	Nil	13/09/1999	10.10.1998	08/03/2007	NA	NA	01/03/2010	08/03/2009	15/03/2010	09/03/2009	14/12/2012
53.	OSI Abdullah Khan, 6/D	20/07/1961	51	5	11	05/04/1981	13/09/1997	Nil	13/09/1999	10.10.1998	08/03/2007	NA	NA	09/06/2011	08/03/2009	15/06/2011	09/03/2009	05/09/2013
54.	OSI Adam Khan, 78/D	09/11/1958	54	1	22	18/11/1976	21/10/2004	Nil	21/10/2006	10.04.1999	08/03/2007	NA	NA	09/06/2011	08/03/2009	15/06/2011	09/03/2009	26/12/2013
55.	OSI Pervez Hussain, 69/D	15/04/1973	39	8	18	11/10/1993	10/10/1996	Nil	10/10/1998	10.04.1999	08/03/2007	NA	NA	09/06/2011	08/03/2009	15/06/2011	09/03/2009	05/09/2013
56.	OSI Liaqat Ali, 50/D	10/01/1959	53	11	21	21/11/1978	13/09/1997	Nil	13/09/1999	10.10.1998	30/04/2007	NA	NA	09/06/2011	30/04/2009	15/06/2011	01/05/2009	26/12/2013
57.	ASI Ghulam Ali, 39/D	12/11/1957	55	1	19	21/06/1976	05/03/1998	Nil	05/03/2000	13.10.1999	10/05/2007	NA	NA	18/04/2012	10/05/2009	23/04/2012	11/05/2009	-
58.	ASI Abdul Ghani, 10/D	11/01/1957	55	11	20	28/10/1976	05/03/1998	Nil	05/03/2000	13.10.1999	16/05/2007	NA	NA	18/04/2012	16/05/2009	23/04/2012	17/05/2009	-
59.	ASI Said Marjan, 40/D	20/11/1965	47	1	11	26/11/1984	01/09/1997	Nil	01/09/1999	13.10.1999	16/05/2007	NA	NA	18/04/2012	16/05/2009	23/04/2012	17/05/2009	-

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Service Appeal No. 1156/2013 (Saleem Parvez Vs Govt. of KP Petition No. 223729-2019 Minhaj Sikandar Yar Khan Vs Police Department)

1	2	3	4			5	6	7	8	9	10	11	12	13	14	15		
			Y	M	D													
S. Nos & Number	Date Birth	Age as it stood on 31/12/2012	Date of Appointment as Constable			Date of Promotion as HC	Existing Date of Confirmation as HC	Revised Date of Confirmation as HC	Date of entry into List D	Date of Appointment as ASI			Existing Date of Confirmation as ASI	Revised Date of Confirmation as ASI	Existing Date of entry into List "E"	Proposed Date of Entry into List E	Existing Date of Promotion as SI	
			By way of promotion (Rankers)		By way of Direct Appointment (Probationers)					De Facto	De Jure							
60.	OSI Shah Nadir, 110/D	10/09/1951	55	3	21	14/10/1975	13/12/1997	Nil	13/12/1999			10.04.1999	16/05/2007	NA	NA	09/06/2011	16/05/2009	15/06/2011
61.	OSI Muhammad Yaqoob, 111/D	01/12/1951	56	0	30	20/10/1975	13/12/1997	Nil	13/12/1999	10.04.1999	16/05/2007	NA	NA	09/06/2011	16/05/2009	15/06/2011	17/05/2009	26/12/2013
62.	ASI Jan Muhammad, 21/D	07/03/1962	50	9	24	19/02/1981	05/03/1998	Nil	05/03/2000	13.10.1999	17/05/2007	NA	NA	18/04/2012	17/05/2009	23/04/2012	18/05/2009	-
63.	OSI Abdul Ghani, 107/D	01/03/1957	55	9	30	21/10/1975	05/03/1998	Nil	05/03/2000	10.04.1999	24/05/2007	NA	NA	09/06/2011	24/05/2009	15/06/2011	25/05/2009	26/12/2013
64.	ASI Muhammad Ashraf, 112/D	05/04/1960	52	8	26	18/04/1978	04/08/1997	Nil	04/08/1999	10.04.1999	26/05/2007	NA	NA	09/06/2011	26/05/2009	15/06/2011	27/05/2009	13.12.2012
65.	OSI Inamullah, 98/D	09/01/1967	45	11	22	01/07/1989	31/12/1995	Nil	31/12/1997	10.04.1999	29/05/2007	NA	NA	09/06/2011	29/05/2009	15/06/2011	30/05/2009	05/09/2013
66.	OSI Ghulam Farid, 109/D	10/06/1960	52	6	21	25/09/1980	13/09/1997	Nil	13/09/1999	10.04.1999	19/06/2007	NA	NA	09/06/2011	19/06/2009	15/06/2011	20/06/2009	26/12/2013
67.	OSI Mumtaz Khan, 104/D	01/06/1965	48	6	30	28/12/1987	17/09/2001	Nil	17/09/2003	20.09.1989	06/08/2007	NA	NA	20/07/2010	06/08/2009	20/07/2010	07/08/2009	14/12/2012
68.	OSI Muhammad Iqbal, 18/D	19/04/1978	34	8	12	NA	NA	NA	NA	NA	10/10/2006	04/11/2006	10/10/2006	04/11/2009	01/02/2010	05/11/2009	23/06/2011	
69.	OSI Tariq Saleem 22/D	31/03/1980	31	09	00	NA	NA	NA	NA	NA	10/10/2006	04/11/2006	10/10/2006	04/11/2009	01/02/2010	05/11/2009	23/06/2011	
70.	OSI Allah Nawaz, 7/D	18/08/1956	56	4	13	07/03/1975	16/02/1997	Nil	16/02/1999	10.10.1998	14/11/2007	NA	NA	09/06/2011	14/11/2009	15/06/2011	15/11/2009	26/12/2013
71.	OSI Sadiqullah, 53/D	01/08/1969	43	4	30	NA	NA	NA	NA	NA	29/12/2006	29/12/2006	29/12/2006	29/12/2009	01/02/2010	30/12/2009	23/06/2011	
72.	OSI Asghar Ali Shah 51/D	03/01/1961	37	11	28	NA	NA	NA	NA	NA	29/12/2006	29/12/2006	29/12/2006	29/12/2009	01/02/2010	30/12/2009	14/12/2012	
73.	OSI Saif-ur-Rehman, 31/D	16/10/1975	37	2	15	NA	NA	NA	NA	NA	29/12/2006	29/12/2006	29/12/2006	29/12/2009	01/02/2010	30/12/2009	14/12/2012	
74.	OSI Muhammad Alamgir, 49/D	06/10/1980	22	2	25	NA	NA	NA	NA	NA	29/12/2006	29/12/2006	29/12/2006	29/12/2009	01/02/2010	30/12/2009	14/12/2012	
75.	OSI Muhammad Intran, 52/D	02/02/1982	30	10	29	NA	NA	NA	NA	NA	29/12/2006	29/12/2006	29/12/2006	29/12/2009	01/02/2010	30/12/2009	14/12/2012	
76.	OSI Syed Sagheer Abbas Shah, 42/D	09/04/1984	28	8	22	NA	NA	NA	NA	NA	05/10/2007	02/10/2007	05/10/2007	02/10/2010	06/10/2010	03/10/2010	14/12/2012	
77.	ASI Saleem Parvez, 87/D	01/03/1978	34	9	30	NA	NA	NA	NA	NA	26/03/2009	06/04/2009	19/02/2009	06/04/2012	27.03.2012	07.04.2012	-	
78.	ASI Sharifullah, 93/D	05/02/1981	31	10	26	NA	NA	NA	NA	NA	10/04/2009	06/04/2009	07/03/2009	06/04/2012	08/03/2012	07.04.2012	-	
79.	ASI Minhaj Sikandar Yar Khan, 88/D	19/08/1981	31	4	12	NA	NA	NA	NA	NA	07/03/2009	06/04/2009	19/02/2009	06/04/2012	27.03.2012	07.04.2012	-	
80.	ASI Ebad Wazir, 89/D	27/01/1982	30	11	4	NA	NA	NA	NA	NA	24/02/2009	06/04/2009	19/02/2009	06/04/2012	25.02.2012	07.04.2012	-	
81.	ASI Kashif Sattar, 92/D	06/04/1985	27	8	25	NA	NA	NA	NA	NA	14/03/2009	06/04/2009	07/03/2009	06/04/2012	27/03/2012	07.04.2012	-	
82.	ASI Fazal-ur-Rehman, 94/D	02/03/1987	25	9	29	NA	NA	NA	NA	NA	19/03/2009	06/04/2009	07/03/2009	06/04/2012	27/03/2012	07.04.2012	-	
83.	ASI Muhammad Adnan, 91/D	14/04/1989	23	8	17	NA	NA	NA	NA	NA	14/03/2009	06/04/2009	07/03/2009	06/04/2012	27/03/2012	07.04.2012	-	

Notes:


- i) Revised Dates of Confirmation mean dates of confirmation revised in compliance with PR 13.18 of the Police Rules, 1934 and the instructions of the Supreme Court of Pakistan contained in paragraph 74 of the Judgment of the Supreme Court of Pakistan in Gul Hassan Jatui & others Vs. Faqir Muhammad Jatui & others, 2016 SCMR 1254,

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Service Appeal No: 1156/2013 (Saleem Pervez Vs Govt. of KP) Petition No: 223/229-2019 Minhaj Sikandar Jar Khan Vs Police Department

- ii) **De Jure Dates of Appointment** mean the dates of appointment discovered from the perusal of the record which the petitioner and other directly appointed ASIs had managed to get inserted in the Promotion List E as it stood on 31.12.2012.
- iii) **De facto dates of appointment** are the dates of appointment which no competent authority had ever issued, but they exist on record on the said promotion List E. An inquiry to fix responsibility on those who managed to get such dates of appointment inserted in the said promotion list E has been ordered vide this office No:5700/ES dated 31.08.2022. DPO DI Khan is conducting this inquiry.


(SHAUKAT ABBAS) PSP 07/11/22
Regional Police Officer,
Dera Ismail Khan

23.11.2021

The petitioner alongwith his counsel and Mr. Muhammad Rasheed, DDA alongwith Muhammad Khalil, S.I (Legal) for the respondents are present.

The learned Deputy District Attorney produced copy of letter No. 5051/ES, dated 20.11.2021 addressed to the Additional Advocate General Khyber Pakhtunkhwa Service Tribunal, Peshawar with reference to his letter dated 17.11.2021 on the subject of Execution Petition No. 229/2019. As ascertained from the information contained in the said letter and from its annexure i.e. minutes of the meeting of Regional Departmental Committee (RDC) held on 11.02.2020, the said committee was constituted at regional level in pursuance to a decision of Departmental Selection Committee (DSC) as constituted by the Inspector General of Police in aftermath of the judgment at credit of petitioner. On reference of DSC, the RDC discussed the direction given in the judgment of this Tribunal as reflected in the minutes of its meeting regarding assignment of seniority to the appellant/petitioner from "due date". The RDC unanimously agreed to revise the seniority list of 2014 in accordance with the rules, judgment of Service Tribunal dated 26.03.2019 as well as directions of IGP Khyber Pakhtunkhwa Peshawar vide letter dated 02.12.2019. It is mentioned in the minutes of RDC that the seniority list was revised by it and new/fresh seniority list "E" 2014 has been issued, wherein the name of petitioner has been placed at Serial No. 52 above the name of OSI Ebad Wazir, 89/D and below the name of OSI Saleem Pervez, 87/D. Formal order dated 19.02.2020 as annexed with the letter to AAG was issued in furtherance of the minutes of meeting to comply with judgment of the Tribunal dated 26.03.2019. Evidently, on acceptance of petitioner's appeal, the impugned seniority list dated 12.03.2014 was set aside followed by direction to respondents to assign seniority to him from the due date. However, it is not deducible from the minutes discussed above that what meaning was assigned to the expression "due date" as used in the operative part of judgment under execution, as far as revision of

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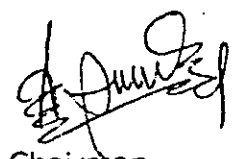
seniority list is concerned. Therefore, it has become expedient to draw parameters for the expression "due date" as used in operative part of the judgment dated 26.03.2019 for its execution in letter and spirit.

It is a matter of rule that the confirmation of the petitioner on the post of A.S.I of police being direct appointee was to be reckoned from the date of his appointment made on 19.02.2009, on completion of prescribed probation period; but due to its having been reckoned otherwise with adverse effect on appellant's seniority, service dispute arose compelling him to invoke the jurisdiction of this Tribunal. The direction given in the judgment under execution to assign seniority to the petitioner from due date is not divertible to reckon any other date of his confirmation than the date of appointment after competition of probation period as PASI. The mode and manner for determination of date of confirmation of PASI is not similar to that of Executive cadre of the police officers. To make the said proposition understandable, reference to Chapter XII of the Police Rules, 1934 is necessary, which deals with appointments and enrolments of police officers. Irrespective of the appointment being one made by promotion or direct recruitment, all appointments of enrolled police officers, within meaning of Sub Rule (3) of Rule 12.2 of the Police Rules, 1934 are considered on probation. According to Rule 12.8, Inspectors, Sergeants, Sub Inspectors and Assistant Sub Inspectors who are directly appointed will be considered to be on probation for three years and are liable to be discharged at any time within the period of their probation. The same Rule i.e. 12.2(3) provides that seniority, in the case of upper subordinates, will be reckoned in the first instance from date of first appointment. Seniority shall, however be finally settled by date of confirmation, the seniority *inter se* of several officers confirmed on the same date being that allotted to them on first appointment remains the same. It is also provided in Rule 12.2(3) that the seniority of lower subordinates shall be reckoned from dates of appointment, subject to the conditions of rule 12.24 and provided that a promoted officer shall rank senior to an officer appointed direct to the same rank on the same date. Chapter XXIII of Volume-II of Police Rules, 1934 contains the provisions describing mode and manner of promotions for the ranks comprising Constable, Head Constable (HC), Assistant Sub Inspector (ASI), and

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Sub Inspector (SI) of Police. Sub Rule (3) of Rule 13.1 provides that for the purposes of regulating promotion amongst enrolled police officers, six promotion lists A, B, C, D, E and F will be maintained. It is further provided thereby that lists A, B, C, D shall be maintained in each district as prescribed in rules 13.6, 13.7, 13.8, and 13.9 respectively. Rule 13.10 of the ibid rules provides for maintaining of List "E" at regional level and Rule 13.15 for maintaining of List "F" at provincial level. According to scheme of the said lists, they are meant for the ranks of Constable, HC, ASI, and SI of Police to maintain their seniority for the purpose of promotion. Among the said ranks, appointment to the post of ASI and SI besides by way of promotion from the lower ranks is also made through direct recruitment. List "D" is maintained for the rank of HC for their promotion to the rank of ASI while list "E" is maintained for the rank of ASI for their promotion to the rank of SI and List "F" for the rank of SI for their promotion to the rank of Inspector. Undeniably, there are two categories of officers whose names are enlisted in List "E" and "F". One category comprises the officers who in common parlance are called rankers and are brought forward from list "D" to List "E" in case of ASI and from List "E" to list "F" in case of SIs. The other category comprises directly recruited ASIs and SIs who in common parlance are called probationers. Section 13 of the Khyber Pakhtunkhwa Act, 2017 envisages the organization of police establishment on functional basis. Legal Affairs Branch has been individualized among the functional branches enumerated under sub section (3) of Section 13 ibid. Thus, the probationers of the Legal Affairs Branch in terms of their functional duty are distinguishable from holders of executive posts in the branches of police responsible for general policing functions. PASI or Sub Inspector (Legal) make part of the Legal Affairs Branch of police and they are not liable to meet the requirements for confirmation as provided for ASI/SI in executive cadre who despite their enlistment in List "D" and "E" remain officiating until they mete out the prescribed criteria for their confirmation in addition to satisfactory completion of probation period on appointment either made by direct recruitment or by promotion. On the other hand, there is no such additional criteria for PASIs or SIs (Legal) except their automatic confirmation on completion of prescribed probation period. I have no hesitation to hold that a PASI

ed by direct recruitment becomes entitled for confirmation from the date of his appointment on automatic confirmation after satisfactory completion of prescribed probation period and in turn, for his enlistment in List "E" from the date of confirmation which remains the same as his date of appointment. Consequently, his seniority in list "E" is supposed be treated accordingly. The SI (Legal) appointed either by direct recruitment or by promotion becomes entitled for confirmation from the date of his appointment after satisfactory completion of the probation period, and in turn for direct enlistment in list "F" prescribed to maintain seniority for the post of Inspector. The forgoing guidelines have been laid down with reference to the law on the subject for convenience of the respondents to revise the seniority of petitioner within parameters of expression "due date" as drawn herein-before to delineate the spirit of the judgment at credit of petitioner. The respondents are directed to actualize the seniority of the petitioner in letter and spirit of the judgment of this Tribunal to ensure its implementation without further delay. To come up for implementation report on 16.12.2021.



Chairman
Camp Court, D.I.Khan