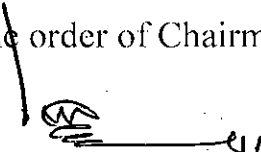


FORM OF ORDER SHEET

Court of _____

Case No. - _____ 1897 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/12/2022	<p>The appeal of Mr. Shah Hussain re-submitted today by Mr. Yasir Rauf Wazir Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p>Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Shah Hussain Vs PPO etc

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>Yasir Rauf Adv</u>		
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	✓	
17	Whether list of books has been provided at the end of the appeal?		✓
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		✓

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Yasir Rauf Advocate
 Signature: [Signature]
 Dated: 19.12.2022

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 1897/2022

Shah Hussain

VS

Provincial Police Officer KP & others

INDEX

S.No	Description of Documents	Annexure	Pages
1	Grounds of Service Appeal, List of Books, Certificate and Affidavit		1-13
2	CM Application for suspension of impugned order dated 01/09/2022 and Affidavit		14-15
3	Copy of Service Book	A	16-18
4	Copy of Notification dated 08/01/2021	B	19-21
5	Copy of Pay Slip	C	22
6	Copy of letter dated 11/08/2021	D	23-24-I
7	Copies of letter dated 17/08/2021 and 03/09/2021 and better copies	E, E-1&F, F-1	25-38
8	Copy of 1 st Inquiry dated 30/06/2021	G	39-41
9	Copies of Suspension order dated 25/11/2021 and better copy	H, H-1	42-42-I
10	Copies of order dated 01/12/2021 and better copy	I, I-1	43-43-I
11	Copy of order dated 06/12/2021	J	44

12	Copy of order dated 14/12/2021	J-1	45
13	Copy of order dated 23/02/2022	K	46
14	Copy of Restoration order dated 25/02/2022	L	47
15	Copies of Appreciation Certificate	M	48
16	Copy of impugned 2 nd inquiry committee Recommendations dated 24/08/2022	N	49-53
17	Copies of impugned reversion order dated 01/09/2022 and better copy	O, O-1	54-56I
18	Copy of Departmental Appeal dated 12/09/2022	P	57-60
19	Copy of 3 rd inquiry committee dated 10/11/2022	Q	61
20	Wakalatnama		62


APPELLANT

THROUGH



YASIR RAUF WAZIR
ADVOCATE HIGH COURT
BANNU
(M.A, LL.B, LL.M IL (IIUI))
Cell # 0332-9745361

Dated: 14/12/2022

①

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 1897/2022

Shah Hussain S/o Akhtar Munir R/o Frontier Region, Mataki Bizen Khel,
Tehsil & District Bannu, Presently working in Police Department Sub
Division Wazir Bannu. (Appellant)

VERSUS

- 1) Secretary Home & Tribal Affairs department, Police Lines Road,
Finance Department, Civil Secretariat, Khyber Pakhtunkhwa,
Peshawar.
- 2) Deputy Secretary (Judicial) Home & Tribal Affairs department, Police
Lines Road, Finance Department, Civil Secretariat, Khyber
Pakhtunkhwa, Peshawar.
- 3) Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
- 4) Regional Police Officer, Bannu Region Bannu.
- 5) District Police Officer, District Bannu.
- 6) District Account Officer, District Bannu. (Respondents)

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED
REVERSION ORDER NO. 3897-3906 DATED 01/09/2022,
WHEREBY THE APPELLANT HAS BEEN REVERTED FROM THE POST
OF ASSISTANT SUB INSPECTOR (BPS-11) TO CONSTABLE (BPS-
07). IN THIS RESPECT THE DEPARTMENTAL APPEAL FILED BY THE
APPELLANT ON 12/09/2022 BEFORE THE APPELLATE AUTHORITY
(RPO BANNU) BUT UPTIL NOW HE NEITHER RESPOND NOR
DECIDED THE SAME AFTER COMPLETION OF MANDATORY
PERIOD.**

NOTE: Addresses of the parties given above are sufficient for the purpose of service.

Respectfully Sheweth;

The Appellant most earnestly seeks permission of this Honourable Court to submit as under;

1. That the Appellant being a peaceful, respectable and law abiding citizen of Pakistan, and is entitled for all the fundamental rights guaranteed in Part-II Chapter 1 under the Constitution of Islamic Republic of Pakistan 1973.
2. That the Respondents are governmental entities; performing functions in connection with the affairs of the Province, as their activities are regulated by laws made by the state and are therefore amenable to the Constitutional Jurisdiction of this Honourable Court.
3. That initially the Appellant was serving in Levies/Khasadar force of Sub-Division Wazir and subsequently merged in Khyber Pakhtunkhwa Police Department Sub Division Wazir Bannu in the year 2019 and still working with heart and soul and to the entire satisfaction of his high-ups.

(Copy of Service Book is attached as Annexure-A)

4. That the Appellant was absorbed as ASI (BPS-11) vide Notification No. SO (Police) HD/SMY 2019 Merged Area/87-97 dated 08/01/2021 by Secretary Home and Tribal Affairs Department with the prior approval of the cabinet and on recommendation of the Provincial Police Officer.

(Copy of Notification dated 08/01/2021 is attached as Annexure-B)

5. That after absorption as Assistant Sub Inspector (BPS-11), the Appellant was performing his duties as ASI and is regularly receiving their monthly salaries since their absorption to the Khyber Pakhtunkhwa police Department till August, 2022.

3

(Copy of Pay Slip is attached as attached as Annexure-C)

6. That on 23/02/2022, the Deputy Inspector General of Police Training sent letter to the DPO's regarding Promotion Courses for SI & ASI of NMDs and in this regard the DPO Bannu vide letter dated 12/03/2022, stated that the Appellant made his arrival on 11-03-2022 after successfully completion of two weeks Course. The Performance Report was duly issued and the Appellant was declared passed.

(Copies of letter dated 23/02/2022, 12/03/2022 and Performance Report are as attached as Annexure-D, D-1&D-2)

7. That on 17/08/2021, the DPO Bannu sent letter to AIG (Training) regarding provision of data of Head Constables/ASI/Constables and Inspectors of NMD and in response the same was forwarded back to the DPO Bannu vide letter dated 03/09/2021 and the name of the Appellant was duly verified as ASI (BPS-11).

(Copies of letter dated 17/08/2021 and 03/09/2021 and better copies are attached as attached as Annexure-E, E-1&F, F-1)

8. That the then Regional Police Officer (RPO) Bannu constituted the inquiry committee regarding Absorption in Levies/Khasadar and comprising Inspector Muhammad Farooq Khan SDPO (Chairman), Inspector Rizwan Khan SDPO/Rural-II and Senior Clerk Javed Khan Head Clerk as members and they filed the inquiry report vide No. 197-200 dated 30/06/2021.

(Copy of 1st Inquiry dated 30/06/2021 is attached as Annexure-G)

9. That suddenly, the then District Police Officer (DPO) Bannu suspended the service of the Appellant vide order No. 8836 dated 25/11/2021 till the arrival of proper verification from Home Department, Peshawar.

(Copies of Suspension order dated 25/11/2021 and better copy are attached as Annexure-H, H-1)

(4)

10. That in this regard the then District Police Officer (DPO) Bannu constituted the committee vide order No. 9004-8 dated 01/12/2021 comprising of Mr. Rizwan SDPO Rural Circle-II Bannu and Mr. Javed Iqbal Head Clerk DPO Office for the purpose to carry out verification.

(Copies of order dated 01/12/2021 and better copy are attached as Annexure-I, I-1)

11. That the Section Officer (Levy & Khasadar) Home and Tribal Affairs Department vide order No. SO (Police) HD/SMY 2019 Merged Area/1333-36 dated 06/12/2021 and stated therein that Mr. Rizwan SDPO Rural Circle-II Bannu and Mr. Javed Iqbal Head Clerk DPO Office visited the office of the undersigned and the committee was provided relevant record and verified the same.

(Copy of order dated 06/12/2021 is attached as Annexure-J)

12. That it is pertinent to mention here that committee members mentioned in para No. 11, on 14/12/2021, states that "Dispatched register of the office of Section Officer (Levies & Khasadars) Home Department was checked with regard to the numbers issued depicted on the notifications which were found correct.

(Copy of order dated 14/12/2021 is attached as Annexure-J-1)

13. That in the light of letter No. 793/EC dated 23/02/2022 received from RPO office Bannu Region Bannu with the following remarks recorded by the RPO Bannu Region Bannu;

"As they have been lawfully absorbed in Police Department in BPS-11 by Home Department, therefore proceed as per law on the subject".

(Copy of order dated 23/02/2022 is attached as Annexure-K)

14. That in compliance with the Worthy RPO order dated 23/02/2022 and in the light of the proper verification carried out, the Appellant was hereby restored w.e.f (Suspension date) i.e.

5

25/11/2021 by the then District Police Officer Bannu vide order No. 1270-74/SRC(SDW) dated 25/02/2022.

(Copy of Restoration order dated 25/02/2022 is attached as Annexure-L)

15. That the Appellant received appreciation certificate from his high-ups and it is evident from that the Appellant is hardworking and he did not compromise on their official duty.

(Copy of Appreciation Certificates are attached as Annexure-M)

16. That all of a sudden once again when the matter was resolved by high-ups, the District Police Officer Bannu vide impugned order dated 11/08/2022 constituted the committee regarding probe into suspicious/controversial notifications and they recommended that the absorption of the Appellant is contrary to the Khasadar Act.

(Copy of impugned 2nd inquiry committee recommendations dated 24/08/2022 is attached as Annexure-N)

17. That in the light of the recommendations raised by the inquiry committee, the District Police Officer Bannu issued an impugned order No. 3897-3906 dated 01/09/2022 and awarded the major penalty by reverted the service of the Appellant from ASI (BPS-11) to Constable (BPS-07).

(Copies of impugned reversion order dated 01/09/2022 and better copy are attached as Annexure-O, O-1)

18. That on 12/09/2022, the Appellant has filed departmental appeal under section 22 of the Civil Servant Act, 1973 against the impugned inquiry committee recommendations dated 24/08/2022 and impugned reversion dated 01/09/2022 before the worthy Regional Police Officer Bannu Region Bannu through proper channel.

(Copy of Departmental Appeal dated 12/09/2022 is hereby attached as Annexure-P)

19. That despite preferred an appeal and still pending before worthy Regional Police Officer Bannu Region Bannu and the petitioners are quite hopeful to be re-instated into service with all back benefits, meanwhile on 10/11/2022, the Respondent No.2 conducted an impugned another 3rd inquiry regarding the absorption order of the Appellant.

(Copy of 3rd inquiry committee dated 10/11/2022 is attached as Annexure-Q)

20. That the Appellant being aggrieved from the illegal and unlawful conduct of the Respondents by issuing the impugned Reversion order dated 01/09/2022, then statutory period of 90 days are also lapsed on the appeal of the appellant, thus having no other remedy and dissatisfied by the actions and inactions, Appellant seeks to approach this Hon'ble Tribunal inter alia on the following grounds:-

GROUNDS:

- A) That the impugned reversion order No. 3897-3906 dated 01/09/2022 is against law, illegal, unlawful, against the Civil Servant Act, 1973.
- B) That the fundamental rights of the Appellant has blatantly been violated by issuing the impugned reversion order No. 3897-3906 dated 01/09/2022 and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic republic of Pakistan 1973.
- C) That the impugned reversion order No. 3897-3906 dated 01/09/2022 is illegal, unlawful, unnatural, void-ab-initio, null and void in the eye of law, hence liable to be declared so.
- D) That without given any notice or given an opportunity of personal hearing was given to the Appellant and issuance of the impugned

reversion order No. 3897-3906 dated 01/09/2022 is the clear cut violation of Right to fair trial i.e. Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973 and also against the settled norms of service laws/rules prescribed for all the institutions.

- E) That according to the legal maxim, "Nemo debet bis vexari (No could be vexed twice for the same offence)" Subsequent proceedings taken against employee on same charge was not justified as no one could be vexed twice for one and same cause. Apex Court in a number of judgments held that Government, was directed to take necessary measures in such matter so that there was no repetition of such mistake in future. Meaning thereby that the Appellant is being harassed and has been vexed twice for double punishment, which is against the mandate of Article 13 of the Constitution of Islamic Republic of Pakistan, 1973.
- F) That according to Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011; Section 5 (a) deals with proceed itself against the accused by showing cause notice and dispense with inquiry. Section 7 (d) deals with opportunity of personal hearing before passing any order of penalty, if it is determined that the charges have been proved against him. Section 10 (d) deals that direction to the accused to submit written defense to the inquiry officer/committee within reasonable time. Similarly, Section 15 of the said act deals with personal hearing.
- G) That according to Section 77 (2) of the Police Act, 2017 "Subject to the rules, a member of the police may at any time be suspended, dismissed, compulsorily retired, reduced in rank or pay, within a time scale, fined, censured or awarded any other punished in the prescribed manner. But in the instant case, no proper legal procedure was taken by the Respondents.

8

- H) That Reduction in rank constituted major penalty and required full-fledged inquiry. No major punishment could be imposed on the basis of fact finding enquiry, for that, regular enquiry should be conducted. According to Rule 29 of the Fundamental Rules; Period for which penalty to remain effective not mentioned in impugned order. Mentioning of such period was mandatory and not directory.
- I) That if the Appellant is being reverted to constable, then the dignity of the Appellant will be in danger in the Police department as well as in the entire society.
- J) That according to absorption Notification dated 08/01/2021, the necessary entries has already been made in the service record of the Appellant and also absorbed into the Police Constable department as ASI BPS-11 and also draw their regular salaries in ASI Rank.
- K) That the law demands justice may not only be done, it should manifestly be done, keeping in view the impugned reversion order No. 3897-3906 dated 01/09/2022 is the clear cut disparity amongst the other officials of the Police Department, as the domain of Article 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973 have been grossly violated by the Respondents in order to adopt favoritism and biased approach. Hence impugned reversion order No. 3897-3906 dated 01/09/2022, not only illegal, ultra-vires, unjustifiable, coram-non-judice but also against the fundamental rights of the Appellant enshrined in the Constitution of Islamic Republic of Pakistan, 1973.
- L) That according to section 12(3) of the Civil Servant Act, 1973, "No such civil servant as aforesaid shall be dismissed or removed from service, or reduced in rank, until he has been given a reasonable opportunity of showing cause against the action proposed to be

M

taken against him". In the instant case, the said provision did not follow by the Respondents.

- M) That as mentioned in the subject, the Appellant is yet to serve the force as well as beloved country till 60 years of age, but issuing the impugned reversion order No. 3897-3906 dated 01/09/2022 is highly unlawful, against the vested right of the Appellant.
- N) That the Apex Court time and again held that the principle of "*Audi Alterm Partam*" natural justice required that a regular inquiry should be conducted in the matter and opportunity of defense and personal hearing should be provided, otherwise it would condemned unheard and in the instant matter, without adopting the required mandatory procedure resulting in manifest injustice, because of entire action was taken unilaterally by the Respondents against the Appellant by issuing the impugned reversion order No. 3897-3906 dated 01/09/2022.
- O) That the actions or omissions have infringed the fundamental rights of the Appellant, including those enshrined under articles 4, 8, 9, 18, 25 and 38 of the Constitution of Islamic republic of Pakistan 1973, these all speak about the well-being of the people, equitable adjustment of rights, protection of life and liberty etc.
- P) That the Respondents are Constitutionally, legally, morally and ethically bound to provide the same facility, provided to the other officials, living in the welfare state; Pakistan.
- Q) That the Appellant has been serving till date with utmost zeal and zest with due honesty but the Respondents owing to their personal grudges and malafide intention and ulterior motives two different inquiries were made regarding the same subject matter and the impugned reversion order No. 3897-3906 dated 01/09/2022 is liable to be struck down.
- R) That the illegal and unlawful actions taken by the Respondents by making time and again inquiry committee is the manifestation of

law of jungle, finding no parallels in the service code, which is arbitrary and whimsical, hence liable to be set at naught.

S) that the Apex Court in the reported case "2020 SCMR 188" held

that:

"It is well settled and established law, that whenever a right has been accrued to the employee and he has received the benefits of the same and later on it has been rescinded by the authority, it would be ineffective upon the rights of employee. Further the principle of estoppel would be applicable in the present case against the department from recovering the emoluments and benefits of BPS-15 from the petitioner, petition for leave to appeal was converted into appeal and allowed"

T) That the inactions and omissions of the Respondents qua the

Appellant has no legal backing and as such is a nullity in the eyes

of law and as well as on the rights and liabilities of the Appellant.

U) That the illegal and unlawful conduct of the Respondents by

issuing three inquiry committees is stigma on the professional

unblemished career of the Appellant and is beyond the mandate

and constitutional command and parameters set by the law.

V) That when once the matter had been settled down by initiating

different inquiries, meaning thereby that the matter is said to be

closed and past transaction, therefore, the impugned reversion

order dated 01/09/2022 is nothing but nullity in the eyes of law.

W) That in fact for the redressal of the grievance, the Appellant has

filed departmental appeal but the worthy RPO Bannu even did not

issue any show cause notice and deaf ear to the departmental

appeal of the Appellant and kept the same in the cold storage and

finally having no other option to put his grievance in the mercy of

this Hon'ble Tribunal.

h


- X) That the counsel for Appellant seeks permission to rely and advance additional grounds at the time of hearing of this petition.

PRAYER IN APPEAL:

In view of the above stated reasons and others to be stated at the time of arguments, it is therefore, most humbly prayed, that on acceptance of this service appeal, this Honourable Tribunal may very graciously be pleased to set-aside the impugned reversion order No. 3897-3906 dated 01/09/2022, being illegal, unlawful, unconstitutional, void-ab-initio, nullity in the eyes of law, against the rights of the Appellant and further re-instated the Appellant into service in his actual rank i.e. Assistant Sub Inspector (BPS-11) with all back benefits. And Grant any other remedy in the circumstances by this Honourable Tribunal to meet the ends of justice.


APPELLANT

THROUGH


YASIR RAUF WAZIR
ADVOCATE HIGH COURT
BANNU
(M.A, LL.B, LL.M IL (IIUI))
Cell # 0332-9745361

Dated: 14/12/2022

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. _____/2022

Shah Hussain

VS

Provincial Police Officer KP & others

LIST OF BOOKS:


- 1) Constitution of Islamic Republic of Pakistan, 1973.
- 2) Civil Servant Act, 1973.
- 3) Police Act, 2017.
- 4) Government Servants (Efficiency & Discipline) Rules, 2011.
- 5) Case Laws according to need.

CERTIFICATE:

As per information furnished to me by my client (Appellant), it is certified that no like such service appeal on the subject matter has ever been moved by the appellant before this Honourable Tribunal.


APPELLANT

THROUGH


YASIR RAUF WAZIR
ADVOCATE HIGH COURT
BANNU
(M.A, LL.B, LL.M IL (IIUI))
Cell # 0332-9745361

Date: 14/12/2022

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. _____/2022

Shah Hussain

VS

Provincial Police Officer KP & others

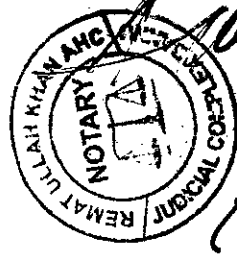
AFFIDAVIT

I, Shah Hussain S/o Akhtar Munir R/o Frontier Region, Mataki Bizen Khel, Tehsil & District Bannu, Presently working in Police Department Sub Division Wazir Bannu, do hereby solemnly affirm and declare that all the contents of this service appeal are true, correct and to the best of my knowledge, belief and nothing have been concealed from this Honourable Court.

[Signature]
DEPONENT

CNIC # 11101-4940717-1

[Signature]
[Signature]
21/12
022.



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. _____/2022

Shah Hussain

VS

Provincial Police Officer KP & others

APPLICATION FOR SUSPENSION OF THE OPERATION OF THE
IMPUGNED REVERSION ORDER NO. 3897-3906 DATED 01/09/2022
ISSUED BY RESPONDENT NO.5 AND RESTRAINED THE RESPONDENTS
FROM FURTHER DEDUCTION FROM THE MONTHLY SALARIES OF THE
APPELLANT, TILL THE FINAL DISPOSAL OF THIS SERVICE APPEAL.

Respectfully Sheweth:

1. That the above noted service appeal is being filed before this Honourable Tribunal, in which no date of hearing has yet been fixed.
2. That the Appellant has got good prima facie case in his favor and is sanguine about its success.
3. That the balance of inconvenience also lies in favor of the Appellant.
4. That if the impugned reversion order No. 3897-3906 dated 01/09/2022 issued by Respondent No.05 (District Police Officer Bannu) is not suspended, the Appellant would sustain an irreparable loss, and very purpose of the instant service appeal would become frustrated.
5. That the Respondents illegally and unlawfully make deduction from the monthly salaries from the appellant.
6. That the facts and grounds of the service appeal may kindly be read as an integral part of this Application.

PRAYER:

It is, therefore, most respectfully prayed that on acceptance of this application, the impugned reversion order No. 3897-3906 dated 01/09/2022 issued by Respondent No.05 (District Police Officer Bannu) may very kindly be suspended and the Respondents are restrained from further deduction from the monthly salaries of the appellant, till the final disposal of the service appeal.

[Signature]
APPELLANT

THROUGH

[Signature]

YASIR RAUF WAZIR
ADVOCATE HIGH COURT
BANNU
(M.A, LL.B, LL.M IL (IIUI)
Cell # 0332-9745361

Date: 14/12/2022

AFFIDAVIT

I, Shah Hussain S/o Akhtar Munir R/o Frontier Region, Mataki Bizen Khel, Tehsil & District Bannu, Presently working in Police Department Sub Division Wazir Bannu, do hereby solemnly affirm and declare that all the contents of this application are true, correct and to the best of my knowledge, belief and nothing have been concealed from this Honourable Court.

[Signature]
[Signature]
21/12/2022
[Signature]
DEPONENT

CNIC # 11101-4940717-1

1. Name (نام) شاہ حسین
2. Nationality and Religion پاکستانی اسلام
3. Residence (قومیت اور مذہب) FR ہونہ منگلی بھرنہ ضلع کراچی
(مستقل رہائش)
4. Father's Name and Residence (والد کا نام اور پتہ) احمد حسین
5. Date of birth by Christian era as Nearly as can be ascertained (تاریخ پیدائش مطابق سن عیسوی) 15-04-1982
6. Exact height by measurement (قد و قامت) _____
7. Personal mark of identification (نشان شناخت) بائیں ہاتھ میں پیر نشاں فرخم

8. Left hand/right hand thumb and finger impressions of (Non-gazetted officer)

(بزرگی کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger
(چھٹا)

Ring Finger
(چھٹا انگلی کی انگلی)

Middle Finger
(اوسط انگلی)

Fore Finger
(اوسط انگلی)

Thumb
(بزرگی)

9. Signature of Govt. Servant

(سرکاری ملازم کے دستخط)

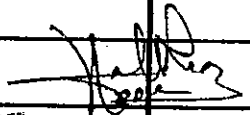
10. Signature and designation of the Head of the Officer or other Attesting Officer

(تصدیق کنندہ افسر کے دستخط اور پتہ)

10-3-11

Note: The entries in this page should be renewed or re-aggected at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔
انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

1 Name of Post درجہ ملازمت	2 Whether Substantive of officiating any whether permanent or temporary عارضی مستقل قائم مقام	3 it officiating state. (i) substantive appointment of (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb) Volume II اگر عارضی ہے تو رول کے مطابق پیش کش کا مستحق ہے؟	4 Pay in substantive position مستحقہ عارضی ملازمت		5 Additional pay for officiating زائد مستحقہ بطور قائم مقام		6 Other emoluments falling under the term pay ماسوائے مستحقہ دیگر الاؤنس	7 Date of appointment تاریخ تقرری	8 Signature of government servant دستخط سرکاری ملازم
			Rs.	Ps.	Rs.	Ps.			
<p>In pursuance of the provisions contained in section (5) of the KP Khasadar Force Act 2019 read with rules 3 of the Khasadar Force (Absorption in KP Police) Rules 2019, on the recommendation of provincial police officer, KPIC, and on the prior approval of provincial cabinet Shah Hussain Uslo Aikhtax Ministry of PUN Division (Maz) is hereby absorbed against the rank of Assistant Sub Inspector ASI (BPS-11) in KP Police vide Home and Tribal Affairs Department Peshawar Notification No. 50(Police) HD/ PNY 2019 (merged Area) 37-97 dated 08-01-2021.</p>									
								<p> District Police Office 21/03/21</p>	
<p>Pay fixed as ASI BPS-11 (12570-880-38970) @ Rs. 19610/- w.e.f. 08-01-2021.</p>									

9 Signature and designation of the head of the office or other attesting officer in attestation of column 1 to 8 دستخط افسر مجاز	10 Date of termination or appointment تاریخ انقطاع ملازمت	11 Reason of termination (such as Promotion, transfer, Dismissal) وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	12 Signature of the head of the officer or other Attesting Officer دستخط افسر مجاز	Nature and duration of leave taken رضعت کی نوعیت ومعيار	13 Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رضعت کے لئے اوسط تنخواہ کا تعین Period عرصہ Government to which debitable حکومت جسے قابل دہانی ہے	14 Signature of the Head of the office or other attesting officer دستخط افسر مجاز	15 Reference to any recorded punishment or censure, reward, or praised or the Government servants سزا یا جزا یا غیر مناسب کارکردگی کا ریکارڈ
---	---	---	---	--	--	--	---

UNDERTAKING

I Mr. Shah Hussain Siddiqui Akhtar Munir under take that as per description to the level of ASI BS-11 in the CP Police the payment of higher rank made to me if found discontinued in future the same may be recovered from my pension.

Shah Hussain Siddiqui
18/4/2021

72-235
12/2

Man active and
1-4-2021

T2 152
9/5/22
DUMM 222391

To 534
14/7/21

any pay of All Allowance
we R 1/20

12 1031-22
21

D.C.A

D.C.A
S.Y

(19) (A) (B)

GOVERNMENT OF THE KHYBER PAKHTUNKHWA HOME AND TRIBAL AFFAIRS DEPARTMENT.

NOTIFICATION

Peshawar dated the, 8/11/2021

No.SO(Police)HD/SMY'2019 Merged Area/ 87-97 In pursuance of the provisions contained in section 5 of the Khyber Pakhtunkhwa Khasadars Force Act 2019 (Khyber Pakhtunkhwa Act No.XXXIV of 2019) read with rule 3 of the Khasadar Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Officer, hereby orders absorption of the following members of Khasadars Force of Wazir Sub-Division in the Khyber Pakhtunkhwa Police with effect from the date of the initial appointment of the said members:

S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
1	Abdul Janan	Abdul Janan	Naib Subedar	ASI (BPS-11)
2	Adam Gul	Adam Gul	Naib Subedar	ASI (BPS-11)
3	Rawal Khan	Rawal Khan	Naib Subedar	ASI (BPS-11)
4	Mashat Ullah Khan	Mashat Khan	Naib Subedar	ASI (BPS-11)
5	Rehmat Ali	Zakim Khan	Naib Subedar	ASI (BPS-11)
6	Mushahid Wadood	Fazal Wadood	Naib Subedar	ASI (BPS-11)
7	Hafiz Rehman	Nazar Gul	Naib Subedar	ASI (BPS-11)
8	Javid Iqbal	Daud Khan	Naib Subedar	ASI (BPS-11)
9	Shah Hussain	Akhtar Munir	Naib Subedar	ASI (BPS-11)
10	Sadam Hussain	Hunar Khan	Naib Subedar	ASI (BPS-11)
11	Riaz Ahmad	Abil Zahid Khan	Naib Subedar	ASI (BPS-11)
12	Kiramatt Ullah Khan	Hamid Ullah Khan	Khassadar	Constable (BPS-7)
13	Noor Rehman	Adam Khan	Khassadar	Constable (BPS-7)
14	Safir Ullah	Gul diaz	Khassadar	Constable (BPS-7)
15	Massab Khan	Shah Alam Khan	Khassadar	Constable (BPS-7)
16	Zar Muhammad Khan	Musharaf Khan	Khassadar	Constable (BPS-7)
17	Kifayat Ullah Khan	Sifat Ullah Khan	Khassadar	Constable (BPS-7)
18	Sohib Khan	Zolfeqar Khan	Khassadar	Constable (BPS-7)
19	Sayed Rahman	Feroz Khan	Khassadar	Constable (BPS-7)
20	Muhammad Yasir	Sher Bahadar Khan	Khassadar	Constable (BPS-7)
21	Saycd Gul	Rajim Khan	Khassadar	Constable (BPS-7)
22	Zaifa Khan	Gulap Khan	Khassadar	Constable (BPS-7)
23	Rasool Muhammad	Alamgir Khan	Khassadar	Constable (BPS-7)

Move to P. 85 (Pay slip)

S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
24.	Irshad Ullah	Mir Ali Khan	Khassadar	Constable (BPS-7)
25.	Fazal Rahman	Ghulam Khan	Khassadar	Constable (BPS-7)
26.	Sadam	Shahid Khan	Khassadar	Constable (BPS-7)
27.	Alam Rahman	Shahid Khan	Khassadar	Constable (BPS-7)
28.	Sabir Zaman	Sabir Zaman	Khassadar	Constable (BPS-7)
29.	Abid Khan	Alam Khan	Khassadar	Constable (BPS-7)
30.	Aziz Ullah	Gul Muhammad Khan	Khassadar	Constable (BPS-7)
31.	Ali Nawar Khan	Maimand Khan	Khassadar	Constable (BPS-7)
32.	Amir Ullah	M. Nawaz Khan	Khassadar	Constable (BPS-7)
33.	Abdul Khaliq	Sabar Jan	Khassadar	Constable (BPS-7)
34.	Shahid Khan	Mubarak Khan	Khassadar	Constable (BPS-7)
35.	Zahir Ullah	Akhtar Muhammad	Khassadar	Constable (BPS-7)
36.	Safi Ur Rehman	Abdul Razaq	Khassadar	Constable (BPS-7)
37.	Karim Ullah	Sher Daraz Khan	Khassadar	Constable (BPS-7)
38.	Allah Noor	Saleh Muhammad	Khassadar	Constable (BPS-7)
39.	Nawaz Sharif	Shamir Gul	Khassadar	Constable (BPS-7)
40.	Muhammad Anwar	Raza Khan	Khassadar	Constable (BPS-7)
41.	Asmat Ullah	Saloot Khan	Khassadar	Constable (BPS-7)
42.	Raikhan	Rasool Khan	Khassadar	Constable (BPS-7)
43.	Zain Ullah	Gul Saday Khan	Khassadar	Constable (BPS-7)
44.	Rahman Zada	Shabib Khan	Khassadar	Constable (BPS-7)
45.	Javid Khan	Mir Abbas Khan	Khassadar	Constable (BPS-7)
46.	Mahmood Khan	Bakhtullah Khan	Khassadar	Constable (BPS-7)
47.	Murad Ullah	Gul Saday Khan	Khassadar	Constable (BPS-7)
48.	Tahir Khan	Farman Ullah	Khassadar	Constable (BPS-7)
49.	Roman Khan	Mir Khatem	Khassadar	Constable (BPS-7)
50.	Hamid Ullah	Nasib Gul	Khassadar	Constable (BPS-7)
51.	Ali Muhammad	Tahsil Khan	Khassadar	Constable (BPS-7)
52.	Muhammad Qasim	Ghazi Rahman	Khassadar	Constable (BPS-7)
53.	Wasim Ullah	Raz Wali Khan	Khassadar	Constable (BPS-7)
54.	Nasrullah Khan	Muhammad Nawaz	Khassadar	Constable (BPS-7)

2. The above absorption shall be subject to the following terms and conditions:

- (i) Their services shall be governed under the Khyber Pakhtunkhwa Police Act, 2017 and the rules-made thereunder.
- (ii) A member shall not be entitled for absorption, if he has resigned from Khasadar Force Service or has been terminated from the Service (in) on account of misconduct, inefficiency or any other grounds or has been retired from Service under the Khyber Khasadars Rules-1950 and Khasadars Service Rules-2011 before commencement of the Khyber Pakhtunkhwa Khasadars Force Act, 2019 (Khyber Pakhtunkhwa Act No. XXXIV of 2019).
 Their services shall be considered regular and they shall be entitled for

7

4/1/2020

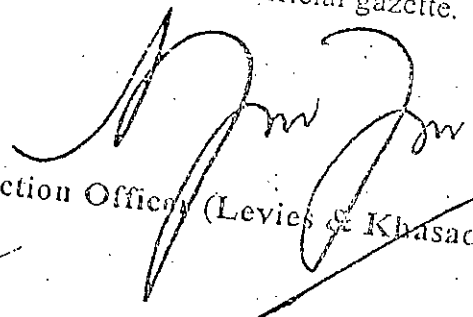
Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act XVIII of 1973).

- (iv) Their seniority shall be determined in accordance with rule 6 of Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019.
- (v) They shall undergo training as provided in rule 5 of Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019.

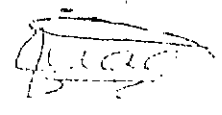
Attested

Secretary
to Government of the Khyber Pakhtunkhwa
Home and Tribal Affairs Department

- 1. Section Officer (L&K) Home & TA's Department (NMA's)
- 2. General of Police, Khyber Pakhtunkhwa.
- 3. Accountant General Khyber Pakhtunkhwa.
- 4. Regional Police Officer, Bannu
- 5. District Police Officer Bannu
- 6. Deputy Commissioner Bannu
- 7. PS to Chief Secretary Government of Khyber Pakhtunkhwa.
- 8. PS to Secretary, Home & TAs Department, Khyber Pakhtunkhwa.
- 9. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa
- 10. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa
- 11. Manager Printing Press for notifying the same in the official gazette.
- 12. Office record file.


Section Officer (Levies & Khasadars)

7



(21) (22) = C u

S#:25410

P Sec:001 Month:April 2022
BU4507 -Law & Ordewr Bannu (SD)
LAW & ORDER BANNU (SD)

Pers #: 50247282 Buckle:
Name: SHAH HUSAIN
ASSISTANT SUB INSPECTOR
CNIC No.1110149407171
GPF Interest Free
11 Active Temporary

NTN:
GPF #:
Old #:

BU4507

AYS AND ALLOWANCES:

0001-Basic Pay	20,490.00
1001-House Rent Allowance 45%	2,778.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
2211-Adhoc Relief All 2016 10%	1,484.00
2224-Adhoc Relief All 2017 10%	2,049.00
2247-Adhoc Relief All 2018 10%	2,049.00
2264-Adhoc Relief All 2019 10%	2,049.00
2309-Adhoc Relief All 2021 10%	2,049.00
2314-Risk Allow Police - 2021	6,707.00
5801-Adj Basic Pay	8,283.00

Gross Pay and Allowances

52,294.00

EDUCTIONS:

GPF Balance 35,850.00	
3530-Police welf: Fud BS-1 to 13	Subrc: 1,290.00
4004-R. Benefits & Death Comp:	.410.00
	600.00

Total Deductions

2,300.00

49,994.00

* D.O.B:
15.04.1982
07 Years 05 Months 027 Days

LFP Quota:
HABIB BANK LIMITED
70001427-03

y

y
[Signature]



23 D

DIRECTORATE OF TRAINING
CENTRAL POLICE OFFICE
KHYBER PAKHTUNKHWA, PESHAWAR

No. 1933-46 Trg: dated 23/02/2022. Phone No. 091-9210941. Fax No. 9211268

To: The Capital City Police Officer,
Peshawar (for Sub-Division Hassan Khel)
The District Police Officers,
Kohat, D.I. Khan, Bannu, Lakki Marwat & Tank.
The District Police Officers,
Khyber, Bajaur, Mohmand, Kurram, Orakzai, SWTD, NWTD.

Subject: MANDATORY PROMOTION COURSES FOR SUB-INSPECTORS & ASSISTANT SUB-INSPECTORS OF NMDs ✓


Memo:

Please refer to this office letter No.1677-89 Trg: dated 14.02.2022.

In the light of minutes of the meeting issued by the AIG Establishment Khyber Pakhtunkhwa held on 01-02-2022 at Conference Room-I, CPO under the Chairmanship of Addl: IGP Inv: Khyber Pakhtunkhwa.

In view of the above, I'm directed to refer to the subject cited above and to communicate that nominate Police Recruit Training qualified (Sub-Inspectors BS-14) for Upper College Course & (Assistant Sub-Inspectors BS-11) for Intermediate College Course in order of seniority of your respective District/Sub-Division with the direction to report PTS Kohat on 05.03.2022 before 1600 hrs positively, under intimation to this office.

Issued with the approval of Worthy Inspector General of Police, Khyber Pakhtunkhwa.


Deputy Inspector General of Police,
Training, Khyber Pakhtunkhwa,
Peshawar

Endst: No. & date even.

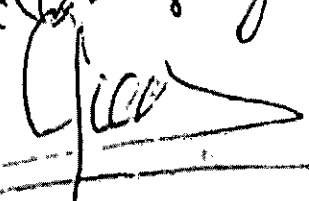
Copy of above is forwarded for information and necessary action to the:-

1. Addl: IGP/HQrs, Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer, Mardan.
3. Regional Police Officer, Malakand.
4. Regional Police Officer, Kohat.
5. Regional Police Officer, Bannu.
6. Regional Police Officer, D.I. Khan.
7. PSO to IGP, Khyber Pakhtunkhwa Peshawar.

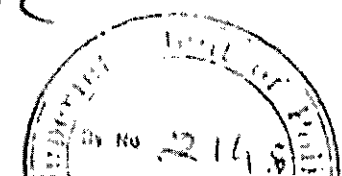
No 819-21 / EC, dt 24/02/02

All DPOs

SRC / OHC (SDW)
For m/ action &
strict compliance.

For compliance
accordingly


District Police Officer.



D-1

24

From District Police Officer,
Bannu

To, The Regional Police Officer,
Bannu Region, Bannu.

No. 1508 /SRC/SDW

Dated: 12/03/2022

SUBJECT: MANDATORY PROMOTION COURSES FOR SUB INSPECTORS & ASSISTANT SUB INSPECTORS

MEMO: In the continuation to this office memo No. 1674/ SRC/SDW dated 02-03-20222

on the subject cited above:

It is submitted that the following SIs & ASI who have made their arrival today on 11-03-2022 after successfully completion of two weeks Target Hardening & Tactical Planning Course at Nowshera. Thus they are nominated for the subject Course. Detailed is as under:-

S.no	Name	F/Name	Rank	D.O.B	D.O.E	Edu:
1.	Wali Rehman	Gulil Khan	SI	04-06-95	1-7-15	FA
2.	Naecm Ullah	Munawar Khan	SI	01-01-01	16-10-20	10th
3.	Shah Hussain	Akhtar Munir	ASI	15-4-82	05-11-14	Nil

District Police Officer,

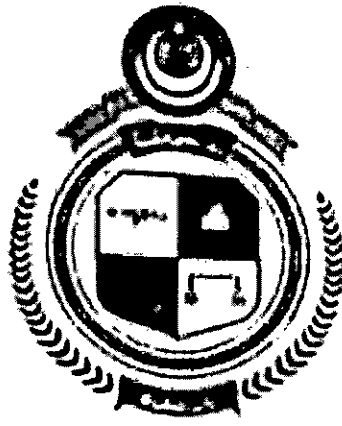
Bannu

o/c
Tel: 0928-9270038
Fax: 0928-9270045
Email: dpobannu20@gmail.com

(24)

D-2

POLICE TRAINING COLLEGE HANGU



1935

Performance Report

Starting Date : 18.03.2022
 College Course : Intermediate
 District/Unit : Hangu
 Belt No. : Nil
 Education : FA

Ending Date : 18.07.2022
 Name : Shah Hussain
 Comp# : 1-6636
 Company : Yaqoob
 Merit : 08

Subjects	Marks obtained	Marks allotted	Subjects	Marks obtained	Marks allotted	Remarks
PPC	45	/100	Parade	29.33	/50.00	Awarded Grace Mark. Declared Passed
CrPC/QS	40	/100	PT	22	/30.00	
LSL	74	/100	FC	30	/50.00	
PR	43	/100	DPA	28	/50.00	
MJ	70	/100	A.Fire SMG	150	/150.00	
SA	65	/100	A.Fire 9mm	48	/75.00	
PPWT	57	/100	R.On P.O's	21.33	/30.00	
PPWP	53	/100	Ambush	14.33	/30.00	
Ist	26	/50	Naka Bandi	19.67	/30.00	
PCE	39	/50	Total	362.66	/495.00	
FPT	23	/40				
AC	31	/30				
FRP	22.5	/30				
Total	588.5	/1000				
Grand Total: 951.16 /1495.00						

Checked & found correct.
 Incharge Secrecy.

Controller of examinations
 For Commandant,
 Police Training College, Hangu.

M

25

Eu



OFFICE OF THE
DISTRICT POLICE OFFICER
BANNU

Phone No: 0928-9270038

Fax No: 0928-9270045

Date: 17 / 08 / 2021.

No. 6230 /

To

Assistant Inspector General of Police,
Training, Khyber Pakhtunkhwa Feshawar

Subject: PROVISION OF DATA OF HCs/SSIs TO INSPECTOR OF NMDs

Reference to your office letter No. 2011/2017g dated 16-03-2021 on the subject cited above.

The requisite information on the provided format is submitted herewith as desired please.

S.No	Rank	Name	F.Name	DOB	Edu	Caste	S.No in Home & TAs Deptt: Absorption Notification	Date of Home & TAs Deptt: Absorption Notification	Category		Remarks
									Ex-Levies	Ex-Khasadar	
1.	SI	Umair Khan	Muhammad Noor	07-03-84	Matric	22200-000000000	02	18-02-2020		Khasadar	
2.	SI	Raham Ayyz	Payoo Sardar	01-10-88	Matric	22200-000000000	01	18-02-2020	Levies		
3.	SI	Shahid Rehman	Umer Khan Zad	5-4-71	FA	22200-000000000	01	18-02-2020	Levies		
4.	SI	Gohar Khan	Gul Noor	04-06-85	FA	22200-000000000	01	18-02-2020		Khasadar	
5.	SI	Wali Rehman	Gul Khan	01-01-01	10th	22200-000000000	02	18-02-2020		Khasadar	
6.	SI	Haeem ullah	Munawar Khan	11-07-94	B-tech	22200-000000000	01	16-10-2020		Khasadar	
7.	SI	Ramin ullah	Asad Khan	02-03-93	BA	22200-000000000	02	16-10-2020		Khasadar	

3

25-1

E-1

Better copy

OFFICE OF THE DISTRICT
POLICE OFFICER BANNU

Phone No. 0928-9270038

Fax: No. 0928-9270045

Dated 17/08/2021

No. 6230/

To

Assistant Inspector General of Police

Training, Khyber Pakhtunkhwa, Peshawar

Subject: **PROVISION OF DATA OF HCs/ASI & SUB INSPECTOR OF NMDs**

Reference to your office letter dated 16/08/2021 on the subject cited above. The requisite information on the prescribe format is submitted herewith as desired please.

SNO	Rank	Name	F.Name	DOB	Edu	Date of Home & TAs Deptt: Absorption Notification	Category
1	SI	Umair Khan	M. Noor	7.3.84	Matric	18-2-2020	Khasadar
2	SI	Raham Ayaz	Payao Sardar	1.1.86	Matric	18-2-2020	Levies
3	SI	Shahid Rehman	Umer Zad	5.4.71	FA	18-2-2020	Levies
4	SI	Gohar Khan	Gul Noor	4.6.95	FA	18-2-2020	Khasadar
5	SI	Wali Rehman	Gulil Khan	1.1.01	10 th	18-2-2020	Khasadar
6	SI	Naeem Ullah	Munawar	11.7.94	B-tech	16-10-2020	Khasadar
7	SI	Ramin Ullah	Asad Khan	2.3.93	BA	16-10-2020	Khasadar



11	ASI	Omeed Khan	Azat Khan	01-01-87	Matric	11101-8753413-7	03	18-02-2020	Levies		
12	ASI	Hussan-Ul-Moab	Hanif Ullah	14-03-87	Matric	11101-8753413-7	03	18-02-2020	Levies		
13	ASI	Fahim Ullah	Zain Ullah	01-01-88	Matric	11101-8753413-7	03	18-02-2020	Levies		
14	ASI	Abid Ullah	Gul Khan	01-01-88	Matric	11101-8753413-7	03	15-02-2020	Levies		
15	ASI	Abdus Salam	Khairabat Khan	01-01-88	Matric	11101-8753413-7	03	18-02-2020	Levies		
16	ASI	Ashraf Huseen	Umar Khan	01-01-86	Matric	11101-8753413-7	03	18-02-2020	Levies		
17	ASI	Zahid ullah khan	Mir Khan sadat	01-01-92	8th	22201-4362216-1	03	18-02-2020		Khasadar	
18	ASI	Asif Zada	Malik Shahzada Khan	10-5-87	MBA	11101-8753413-7	03	18-02-2020		Khasadar	
19	ASI	Rizwan Khan	Taar Khan	01-01-76	8th	22201-4362216-1	03	16-10-2020		Khasadar	
20	ASI	Hikmat ullah	Gul Tar Ali Khan	01-01-89	12th	11101-8753413-7	04	16-10-2020		Khasadar	
21	ASI	Mushahid Wadood	Fazal Wadood	04-05-93	MA/LL B	11101-8753413-7	05	08-01-2021		Khasadar	
22	ASI	Sadam Hussain	Hunar Khan	01-02-93	MA	11101-8753413-7	10	03-01-2021		Khasadar	
23	ASI	Hafiz Rehman	Nazar Gul	03-03-93	MA	11101-8753413-7	07	03-01-2021		Khasadar	
24	ASI	Hamayun		01-01-93			03				

(Signature)

26-1

Better copy

0	ASI	Omeed	Azat Khan	1.1.87	Middle	18-2-2020	Levies
11	ASI	Hussan	Hanif Ullah	14.3.87	Middle	18-2-2020	Levies
12	ASI	Fahim	Zain Ullah	1.1.88	Middle	18-2-2020	Levies
13	ASI	Abid	Gul Khan	1.1.88	Matric	18-2-2020	Levies
14	ASI	Abdus Salam	Khairabat	1.1.88	Matric	18-2-2020	Levies
15	ASI	Ashraf	Umar Khan	1.1.86	Matric	18-2-2020	Levies
16	ASI	Zahid	Mir Sadat	1.1.92	8 th	18-2-2020	Khasadar
17	ASI	Asif	Shahzada	10.5.87	MBA	18-2-2020	Khasadar
18	ASI	Rizwan	Taar Khan	1.1.76	8 th	16-10-2020	Khasadar
19	ASI	Hikmat	Gul Taar	1.1.89	12 th	16-10-2020	Khasadar
20	ASI	Mushahid Wadood	Fazal Wadood	4.5.93	MA/LLB	08-01-2021	Khasadar
21	ASI	Sadam Hussain	Hunar Khan	1.2.93	MA	08-01-2021	Khasadar
22	ASI	Hafiz Rehman	Nazar Gul	3.3.93	MA	08-01-2021	Khasadar
23	ASI	Hamayun	Rawal Khan	1.1.68	Matric	08-01-2021	Khasadar

7

27

27	ASI	Shah Muzain	Akhtar Munir	15-4-82	8th	11101-240000-1	09	03-01-2021	Khasadar
28	ASI	Abdullah Tahar	Dawood Khan	01-01-75	8th	11101-240000-1	09	03-01-2021	Khasadar
29	ASI	Muhtar Ullah Khan	Mashaq Khan	23-12-81	6A	11101-240000-1	04	08-01-2021	Khasadar
30	ASI	Abdullah Khan	Abdul Janan	01-04-50	FA	22201-030000-1	01	08-01-2021	Khasadar
31	ASI	Rehmat Ali	Zakim Khan	01-01-67	8th	11101-240000-1	05	08-01-2021	Khasadar
32	ASI	Muhammad Tahir	Khushdil Khan	25-07-1990	FA	11101-146000-1	05	16-10-2020	Khasadar
33	ASI	Hajj Shah	Ali Ajmar hamza	30-09-88	10th	11101-713500-1	04	18-02-2020	Khasadar
34	HC	Faqir Rehman	ur Noor ali	01-01-64	Nil	22201-8064319-5	32	18-02-2020	Khasadar
35	HC	Hafiz Ullah Khan	Umar Khan	15-07-91	Nil	11101-4211465-3	19	18-02-2020	Khasadar
36	HC	Muhammad Zahir Shah		01-01-73	Nil	11101-8513954-5	25	18-02-2020	Khasadar
37	HC	Abdul Ghaffar	Abdul Jabbar	01-01-64	Nil	11101-1529814-1	17	18-02-2020	Khasadar
38	HC	Khalil Khan	Shah Khan	Bataz 03-04-91	FA	11101-6027640-9	23	18-02-2020	Khasadar
39	HC	Muhammad Arif	Zar Wali Jan	01-01-83	NIL	22201-8116404-7		18-02-2020	Khasadar
40	HC	Shah Khan	Eid Khan	Jan 70	Nil	11101-7210473-5	11	18-02-2020	Khasadar
41	HC	Shah Khan	Sahir Jan	01-01-83	9th	22201-6122215-7	36	18-02-2020	Khasadar

[Handwritten signature]

[Handwritten mark]

27-1

Better copy

5	ASI	Shah Hussain	Akhtar Munir	15.4.82	8 th	08-01-2021	Khasadar
26	ASI	Javid Iqbal	Dawood Khan	1.1.75	8 th	08-01-2021	Khasadar
27	ASI	Mukhtar Ullah	Mashat Khan	29.12.94	BA	08-01-2021	Levies
28	ASI	Abdullah Khan	Abdul Janan	1.4.90	FA	08-01-2021	Levies
29	ASI	Rehmat Ali	Zakim Khan	1.1.67	8 th	08-01-2021	Khasadar
30	ASI	Muhammad Tahir	Khushdil Khan	25.7.90	FA	16-10-2020	Khasadar
31	ASI	Hajj Ali Shah	Aaimar Hamza	30.9.88	10 th	18-02-2020	Khasadar
32	HC	Faqir ur Rehman	Noor Ali	1.1.64	Nil	18-02-2020	Khasadar
33	HC	Hafiz Ullah Khan	Umar Khan	15.7.91	Nil	18-02-2020	Khasadar
34	HC	Muhammad Zahir Shah		1.1.73	Nil	18-02-2020	Khasadar
35	HC	Abdul Ghaffar	Abdul Jabar	1.1.64	Nil	18-02-2020	Khasadar
36	HC	Khalil Khan	Shah Bataz Khan	3.4.91	FA	18-02-2020	Khasadar
37	HC	Muhammad Amin	Zar Wali Khan	1.1.83	Nil	18-02-2020	Khasadar
38	HC	Sabo Khan	Eid Khan	Jan-70	Nil	18-02-2020	Khasadar
39	HC	Samir Ullah	Sultan Jan	1-1-85	9 th	18-02-2020	Khasadar

7

				71				18-02-2020	Khasadar	28
41.	HC	Abdullah Khan	Khawza Khan	01-01-84	10th	11101-8000000-1	10	18-02-2020	Khasadar	
42.	HC	Barkat Ullah	Pir Zad Khan	01-01-87	Nil	11101-8000000-1	10	18-02-2020	Khasadar	
43.	HC	Noor Azim	Mir Haq Nawaz	20-1-89	8th	11101-8000000-1	12	18-02-2020	Khasadar	
44.	HC	Farhat Ullah	Sher Khan Nawaz	17-04-87	FA	11101-8000000-1	10	18-02-2020	Khasadar	
45.	HC	M. Ishaq	Nizam Khan	19-01-88	Matric	11101-8000000-1	09	18-02-2020	Levies	
46.	HC	Amir Ullah	Muhammad Gul	10-09-88	Middle	11101-8000000-1	10	18-02-2020	Levies	
47.	HC	Gul Azim	Mir Haq Nawaz	01-01-89	MA	22201-0184310-9	11	18-02-2020	Levies	
48.	HC	Rehman Ali	Awal Rahman	09-01-89	Middle	11101-9473045-9	11	18-02-2020	Levies	
49.	HC	M. Ibrahim	Noor Ali	15-01-89	Matric	11101-8415246-7	13	18-02-2020	Levies	
50.	HC	Sherman Ullah	Karamat Khan	02-03-89	FA	11101-8445707-3	14	18-02-2020	Levies	
51.	HC	Rahmat Ayaz	Toor Ali	15-03-89	Matric	11101-7038421-7	15	18-02-2020	Levies	
52.	HC	Saad Ullah Jan	Nasrullah Jan	26-04-89	Middle	11101-3847409-7	15	18-02-2020	Levies	
53.	HC	Sher Abdullah	Sher Azam	01-01-90	Middle	11101-6808470-5	17	18-02-2020	Levies	
54.	HC	Aman Ullah	Sher Wali Khan	01-01-90	Matric	11101-2592158-1	18	18-02-2020	Levies	

(Signature)

(Signature)

28-1

Better copy

41	HC	Abdullah Khan	Khwazha Khan	1.1.84	10 th	18-02-2020	Khasadar
42	HC	Barkat Ullah	Pir Zad Khan	1.1.87	Nil	18-02-2020	Khasadar
43	HC	Noor Azim	Mir Haq Nawaz	20.1.80	8 th	18-02-2020	Khasadar
44	HC	Farhat Ullah	Sher Nawaz Khan	17.4.87	FA	18-02-2020	Khasadar
45	HC	M. Ishfaq	Nizam Khan	19.04.88	Matric	18-02-2020	Levies
46	HC	Amir Ullah	Muhammad Gul	10.9.88	Middle	18-02-2020	Levies
47	HC	Gul Azim	Mir Haq Nawaz	1.1.89	MA	18-02-2020	Levies
48	HC	Rehman Ali	Awal Rehman	9.1.89	Middle	18-02-2020	Levies
49	HC	M. Ibrahim	Noor Ali	15.1.89	Matric	18-02-2020	Levies
50	HC	Sherman Ullah	Karamat Ali	2.3.89	FA	18-02-2020	Levies
51	HC	Rahmat Ayaz	Toor Ali	15.3.89	Matric	18-02-2020	Levies
52	HC	Saad Ullah Jan	Nasrullah Jan	26.4.89	Middle	18-02-2020	Levies
53	HC	Sher Abdullah	Sher Azam	1.1.90	Middle	18-02-2020	Levies
54	HC	Aman Ullah	Sher Wali Khan	1.1.90	Matric	18-02-2020	Levies

29

55.	HC	Wah Muhammad	Mir Zaman	11-05-90	Matric	11101-9051805-1	19	18-02-2020	Levies	
56.	HC	Arman Khan	Haq Dad Khan	20-05-90	Matric	11101-7522117-1	20	18-02-2020	Levies	
57.	HC	Ramid Khan	Abdul Rashid	11-03-91	Matric	11101-7867796-2	21	18-02-2020	Levies	
58.	HC	Sarnood Khan	M. Sharif	01-01-92	Matric	11101-2360731-6	22	18-02-2020	Levies	
59.	HC	Ahmad Ullah	Asmat Ullah	08-04-92	Matric	11101-7486747-9	23	18-02-2020	Levies	
60.	HC	Sikander Khan	Abdul Jabar	09-03-92	Matric	11101-5519110-3	24	18-02-2020	Levies	
61.	HC	Khush Muhammad	Mehar Ali	15-03-92	FA	11101-1388460-1	25	18-02-2020	Levies	
62.	HC	Shad Ayaz	Abdul Ghafer Ali	08-09-82	Matric	11101-1434663-3	26	18-02-2020	Levies	
63.	HC	Naik Muhammad	Dost Muhammad	01-01-88	10th	22201-524044-1	27	18-02-2020		Khasadar
64.	HC	Shahid Ullah	Gula Band	01-01-88	FA	22201-5784163-1	28	18-02-2020		Khasadar
65.	HC	Raip Khan	Par Khan	06-04-84	10th	22201-6917087-7	29	18-02-2020		Khasadar
66.	HC	Irfan Ullah	Mir Nat Khan	01-01-94	8th	11101-2881180-5	30	18-02-2020		Khasadar
67.	HC	Gul Zaman	Muhammad Jan	01-01-86	Nil	11101-1490864-5	31	18-02-2020		Khasadar
68.	HC	Noor Sadiq	Noor Alam	01-01-89	8th	22201-9256915-9	32	18-02-2020		Khasadar
69.	HC	Rahimi Ullah	Zama Jan	01-01-89	Nil	11101-2149831-1	33	18-02-2020		Khasadar

[Handwritten Signature]

[Handwritten Mark]


29-1

Better Copy

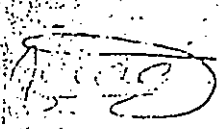
55	HC	Wali Muhammad	Mir Zaman	14.5.90	Matric	18-02-2020	Levies
56	HC	Arman Khan	Haq Dad	20.5.90	Middle	18-02-2020	Levies
57	HC	Hamid Khan	Abdul Rashid	21.9.91	Matric	18-02-2020	Levies
58	HC	Samood Khan	M. Sharif	1.1.92	Matric	18-02-2020	Levies
59	HC	Ahmad Ullah	Asmat Ullah	8.04.92	Matric	18-02-2020	Levies
60	HC	Sikandar Khan	Abdul Jabar	9.3.92	Matric	18-02-2020	Levies
61	HC	Khush Muhammad	Mehar Dil	15.3.82	FA	18-02-2020	Levies
62	HC	Shad Ayaz	Abdul Ghafar Ali	3.9.82	Matric	18-02-2020	Levies
63	HC	Naik Muhammad	Dost Muhammad	1.1.88	10 th	18-02-2020	Khasadar
64	HC	Shahid Ullah	Gula Band	1.1.88	FA	18-02-2020	Khasadar
65	HC	Raip Khan	Par Khan	6.6.84	10 th	18-02-2020	Khasadar
66	HC	Irfan Ullah	Mir Nat Khan	1.1.94	8 th	18-02-2020	Khasadar
67	HC	Gul Zaman	Muhammad Jan	1.1.86	Nil	18-02-2020	Khasadar
68	HC	Noor Sadiq	Noor Alam	1.1.89	8 th	18-02-2020	Khasadar
69	HC	Rahim Ullah	Zama Jan	1.1.89	Nil	18-02-2020	Khasadar

M

70	HC	Muhammad	Sakhi Muhammad	01-01-99	Nil	11101-6363374-5	22	18-02-2020	30	Khasadar
71	HC	Said Ullah	Khandan	01-01-93	Nil	22201-2028274-3	31	18-02-2020		Khasadar
72	HC	Said Ahmad	Abd Zabid	1-1-94	Nil	22201-8759912-9	24	08-01-2021		Khasadar
73	HC	Muhamma d Zabid Khan	Sayed Khan	08-10-97	BA	11101-8698503-5	28	18-02-2021		Khasadar
74	HC	Said Ullah Khan	Said Nazir Khan	01-01-87	8th	22201-3475977-1	26	18-02-2021		Khasadar
75	HC	Said Khan	Zahid Khan	29-11-90	8th	11101-2187569-9	26	18-02-2021		Khasadar
76	HC	Tahir Abdullah Khan	Karzar Khan	01-01-00	Nil	11101-5962401-7	06	16-10-2020		Khasadar
77	HC	Nisar Muhamma d	Awal Khan	08-10-76	Nil	11101-5089012-3	07	16-10-2020		Khasadar
78	HC	Said Ullah	Shaiz Khan	01-01-92	Nil	11101-6122001-7	21	18-02-2020		Khasadar
79	HC	Said Khan	Azal Khan	01-01-61	Nil	11101-6000001-5	35	18-02-2020		Khasadar


District Police Officer,
F of Bannu

Copy of above is submitted to the District Police Officer, Bannu Region, Bannu for
information with the District Police Officer, Bannu dated 16.03.2021.


District Police Officer,
F of Bannu

30-1

Better Copy

70	HC	Asim Muhammad	Sakhi Muhammad	1.1.89	Nil	18-02-2020	Khasadar
71	HC	Said Ullah	Khandan	1.1.93	Nil	18-02-2020	Khasadar
72	HC	Riaz Ahmad	Abid Zahid	1.1.94	Nil	08-01-2021	Khasadar
73	HC	Muhammad Abid Khan	Javed Khan	8.10.97	BA	18-02-2021	Khasadar
74	HC	Safir Ullah Khan	Gul Naik Khan	1.1.87	8 th	18-02-2021	Khasadar
75	HC	Shah Zeb Khan	Zahid Khan	2911.90	8 th	18-02-2021	Khasadar
76	HC	Tariq Nawaz Khan	Karkar Khan	1.1.00	Nil	16-10-2020	Khasadar
77	HC	Noor Muhammad	Awal Khan	8.10.76	Nil	16-10-2020	Khasadar
78	HC	Irfan Ullah	Shaiz Khan	1.1.92	Nil	18-02-2020	Khasadar
79	HC	Esa Khan	Azal Khan	1.1.64	Nil	18-02-2020	Khasadar

District Police Officer, Bannu

No. 6231

Copy of above is submitted to the Regional Police Officer, Bannu Region Bannu for information.

District Police Officer, Bannu

The Capital City Police Officer, Peshawar (for Sub-Division Hassan Khan)
 The Regional Police Officers,
 Mardan, Malakand, Bannu, Kohat & D.I. Khan.

31 30

PROVISION OF DATA OF HCs/ASIS/SIs & INSPECTORS OF NMDs

Subject:
 Memo:

I am directed to refer to the subject captioned above and communicate that the subject details may please be furnished on the following format and sent to this by tomorrow, positively.

S/No.	Rank	Name	F/Name	D.O.B	Edu	CNIC	S/No. in Home & TAs Deptt: Absorption Notification	Date of Home & TAs Deptt: Absorption Notification	Category		Remarks
									Ex-Levy	Ex-Khasadar	
1.											
2.											
3.											
4.											
5.											

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

No. 6974-85/17g

- Copy of above is forwarded for information and necessary action to the:-
1. District Police Officers, Kohat, Lakki, Bannu, D.I. Khan & Tank for newly merged Sub-Divisions (Ex-FRs).
 2. All District Police Officers of Newly Merged Districts.

MC. 2984-86/30
 dt; 16/8/2021

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

All Dpos in
 Bannu Region

For com since lefts
 direct to High ups
 under in formation
 This office.

Quraish

2

Quraish

16/8/21

To

31-1

Boffer copy

The Capital City Police Officer, Peshawar

The Regional Police Officers, Mardan, Malakand, Bannu, Kohat & D I Khan

PROVISION OF DATA OF HCs/ASI & SUB INSPECTOR OF NMDS Subject:

I am directed to refer to the subject noted above and to communicate that the subject details may please be furnished on the following and send to this by tomorrow, positively.

SNO	Rank	Name	F.Name	DOB	Edu	CNIC	S/No. in Home & TAS Deptt:	Deptt: Absorption Notification	Date of Home Absorption Notification	Category
1										
2										
3										
4										
5										

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

No. 6974-85/Trg

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

1. District Police Officers, Kohat, Lakki, Bannu, D. I. Khan & Tank for newly merged Sub-Divisions (Ex-FRS)
2. All District Police Officers of Newly Merged Districts.

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

① ○ (39) "F"
DIRECTORATE OF TRAINING
CENTRAL POLICE OFFICE
KHYBER PAKHTUNKHWA, PESHAWAR
Email: dsytrgbasic@gmail.com

7302-10

03/09/2021

Phone No. 091-9210931, Fax No. 9211268

The District Police Officer,

Bannu

Request

03/09/2021

Subject: PROVISION OF DATA REGARDING HC's/ASI's/SI's/INSPECTORs of NMDs AND F.I.E.s

Reference to the subject cited above and your letter No. 6230 dated: 17.08.2021, find the attached list for verification of the data in accordance to Home Department, Khyber, Pakhtunkhwa Peshawar different notifications. Also fill-up the missing information (Highlighted) in the attached lists. The corrected lists shall be forwarded to the Directorate of Training, CPO Peshawar within 02 days, positively both in hard and soft formats on dsytrgbasic@gmail.com

The mater may please be treated as top priority.

Move to p. 103

[Handwritten Signature]

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

Cc:-

1. Deputy Inspector General of Police, HQrs, Khyber Pakhtunkhwa.
2. Regional Police Officer, Bannu.
3. PSO to IGP Khyber Pakhtunkhwa.

OHC / SRL (SDW)

for compliance

[Handwritten Signature]

Hz

07/09/2021

[Handwritten Signature]

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

7

32-1
F-1

Better copy

DIRECTORATE OF TRAINING

CENTRAL POLICE OFFICE

KHYBER PAKHTUNKHWA, PESHAWAR

Dated 03/09/2021

No. 7307-10

To

The District Police Officer,

Bannu

Subject:

PROVISION OF DATA OF HCs/ASI & SUB INSPECTOR OF NMDs AND EX-FRs

Memo,

Reference to the subject cited above and your letter No. 6230 dated 17.08.2021, find the attached list for verification of the data in accordance to Home Department, Khyber Pakhtunkhwa, Peshawar different Notifications. Also fill-up the missing information (Highlighted) in the attached lists. The corrected lists shall be forwarded to the Directorate of Training CPO Peshawar within 02 days positively both in hard and soft formats on dsptgrbasic@gmail.com

The matter may please be treated as top priority.

(Dr. Qureshi Khan) PSP, PhD

Assistant Inspector General of Police

Training, Khyber Pakhtunkhwa

Cc:

1. Deputy Inspector General of Police, HQs, Khyber Pakhtunkhwa.
2. Regional Police Officer, Bannu.
3. PSO to IGP Khyber Pakhtunkhwa.

(Dr. Qureshi Khan) PSP, PhD

Assistant Inspector General of Police

Training, Khyber Pakhtunkhwa

POLICE STRENGTH RANK WISE DISTRICT BANNU, WAZIR SUBDIVISION (FOR TRAINING PURPOSE ONLY)

(Total)

SUB-INSPECTORS

S.No.	Rank	Name	Father Name	D.O.B	Edu.	CNIC No.	S.No. in Home & TAs Deptt. Absorption Notification	Date of Home & TAs Deptt. Absorption Notification	Category
1.	SI (14)	Usair Khan	Muhammad Noor	07.03.1984	Metric	11101-3575636-1	02	18.02.2020	Ex-Levy Ex-Khaskhel
2.	SI (14)	Raham Ayyaz	Payao Sardar	01.01.1986	Metric	22201-5722727-5	01	18.02.2020	Ex-Levy
3.	SI (14)	Shahid Rehman	Umar Zaid Khan	01.04.1971	FA	22201-1158695-9	02	18.02.2020	Ex-Levy
4.	SI (14)	Gohar Khan	Gul Noor	01.06.1995	FA	21708-6910567-5	01	18.02.2020	Ex-Nasir
5.	SI (14)	Wali Rehman	Gul Khan	01.01.2001	10 th	22201-9468991-1	03	18.02.2020	Ex-Nasir
6.	SI (14)	Nasim ulah	Munawar Khan	11.07.1994	B-Tech	11101-9409399-1	01	16.10.2020	Ex-Khaskhel
7.	SI (14)	Rashid ulah	Asad Khan	02.03.1995	BA	11101-8369409-3	02	16.10.2020	Ex-Nasir

Inspector = 00

SI = 07

SI = 04

SI = 04

SI = 04

SI = 04

Handwritten signature

Handwritten mark

33

DISTRICT BANKRUPTCY DIVISION (FOR TRAINING PURPOSE ONLY)

ASSISTANT SUB-INSPECTORS

Sl. No.	Rank	Name	Father Name	D.O.B	Educ.	CNIC No.	S.N. in Home & Tas Depl. Absorption Notification	Date of Home & Tas Depl. Absorption Notification	Category	
									Ex-Levy	Ex-Klassifikasi
1	ASI (11)	Shah Zaid Khan	Moin Ullah	01.01.1966	Shh	22201-4943691-7	06	18-02-2020	Ex-Levy	Ex-Klassifikasi
2	ASI (11)	Kalam Khan	Nemat Khon	01.01.1979	Nil	22201-6092455-1	08	18-02-2020	Ex-Levy	Ex-Klassifikasi
3	ASI (11)	Omeed Khan	Azat Khan	01.01.1987	Shh	22201-7138150-9	04	18-02-2020	Ex-Levy	Ex-Klassifikasi
4	ASI (11)	Hussain-Ul-Moeb	Harif Ullah	14.03.1987	Shh	11101-4220459-5	05	18-02-2020	Ex-Levy	Ex-Klassifikasi
5	ASI (11)	Fahim Ullah	Zain Ullah	01.01.1988	Shh	11101-6228661-9	06	18-02-2020	Ex-Levy	Ex-Klassifikasi
6	ASI (11)	Abid Ullah	Gul Khan	01.01.1988	Matric	11101-7374565-9	07	18-02-2020	Ex-Levy	Ex-Klassifikasi
7	ASI (11)	Abdus Salam	Khairat Khan	04.01.1988	Matric	22201-3415976-5	03	18-02-2020	Ex-Levy	Ex-Klassifikasi
8	ASI (11)	Ashraf Hussain	Umar Khan	01.01.1986	Matric	11101-3243820-7	03	18-02-2020	Ex-Levy	Ex-Klassifikasi
9	ASI (11)	Zaid ulah Khan	Mir Sadat Khan	01.01.1992	Shh	22201-4576682-5	09	18-02-2020	Ex-Levy	Ex-Klassifikasi
10	ASI (11)	Asif Zada	Malik Shahzada Khan	10.05.1987	MBA	11101-5260494-5	05	18-02-2020	Ex-Levy	Ex-Klassifikasi
11	ASI (11)	Rizwan Khan	Taar Khan	01.01.1976	Shh	222014532056-1	03	16.10.2020	Ex-Levy	Ex-Klassifikasi
12	ASI (11)	Hikmat ulah	Gul Far Ali Khan	01.01.1989	12th	11101-9135203-1	04	16.10.2020	Ex-Levy	Ex-Klassifikasi
13	ASI (11)	Mushahid Warlood	Fazal Wadood	01.05.1993	MA/LLB	11101-8638809-1	06	08.01.2021	Ex-Levy	Ex-Klassifikasi
14	ASI (11)	Sadam Hussain	Honar Khan	01.02.1993	M.A	11201-8783813-7	10	08.01.2021	Ex-Levy	Ex-Klassifikasi
15	ASI (11)	Hafiz Rehman	Nazir Gil	03.03.1995	M.A	11101-8695129-7	07	08.01.2021	Ex-Levy	Ex-Klassifikasi

M. M. M. M.

2

30
2
Adam Khan
Muhammad Aslam
Rehman

7061
537
S. W. Nazir
Rehman

12

BRIDGE STRENGTH RANK WISE DISTRICT BANNU WAZIR SUBDIVISION (FOR TRAINING PURPOSE ONLY)

16.	ASI (11)	Hameem Khan	Rawal Khan	01.01.1986	S th	11101-4809184-9	03	05.01.2021	EN-NASIR
17.	ASI (11)	Hassan Gul	Adam Gul	01.01.1966	S th	11101-0817654-1	02	08.01.2021	EN-NASIR
18.	ASI (11)	Shah Hussain	Akhtar Munir	15.04.1982	S th	11101-9440717-1	09	05.01.2021	EN-NASIR
19.	ASI (11)	Javid Iqbal	Dawood Khan	01.01.1975	S th	111101-4650283-3	08	08.01.2021	EN-NASIR
20.	ASI (11)	Mukhtar Ullah Khan	Mashat Khan	29.12.1994	BA	22201-2224836-9	04	05.01.2021	EN-NASIR
21.	ASI (11)	Abdullah Khan	Abdul Janan	01.04.1990	FA	22201-5347253-3	01	08.01.2021	EN-NASIR
22.	ASI (11)	Rehmat Ali	Zakim Khan	01.01.1967	S th	11101-1180515-1	05	05.01.2021	EN-NASIR
23.	ASI (11)	Mohammad Tahir	Khushdil Khan	23.07.1990	FA	11101-1461003-3	05	16.10.2020	EN-NASIR
24.	ASI (11)	Haji Ali Shah	Yasir Hanza	30.09.1988	10th	11101-7135039-9	04	18.02.2020	EN-NASIR

35

78

MALIK

2

POLICE STRENGTH RANK WISE DISTRICT BANNU WAZIR SUBDIVISION (GOD TRAINING PURPOSE ONLY)

HEAD CONSTABLES

S.No.	Rank	Name	Father Name	D.O.B	Edu.	CNIC No.	S.No. in Home & TAs Degr. Absorption Notification	Date of Home & TAs Degr. Absorption Notification	Category	
									Ex-Levy	Ex-Khasadar
1.	HC-09	Faqir ur-Rehman	Noor ali	01.01.1964	Nil	22201-8064319-5	32	18-02-2020	Ex-Khasadar	Head Constable
2.	HC-09	Haftz Ullah Khan	Umar Khan	15.02.1991	Nil	11101-4211495-3	19	18-02-2020	Ex-Khasadar	Head Constable
3.	HC-09	Muhammad Zahir Shah	Saleh Jan	01.01.1973	Nil	11101-8513954-5	25	18-02-2020	Ex-Khasadar	Head Constable
4.	HC-02	Abdul Ghaflar	Abdul Jabbar	01.01.1954	Nil	11101-1529814-1	17	18-02-2020	Ex-Khasadar	Head Constable
5.	HC-09	Khalil Khan	Shah Bano Khan	03.04.1991	FA	11101-6027640-9	23	18-02-2020	Ex-Khasadar	Head Constable
6.	HC-09	Jasbo Khan	Eid Khan	Jan-20	Nil	11101-7210473-5	11	18-02-2020	Ex-Khasadar	Head Constable
7.	HC-09	Sana Ullah	Sala Jan	01.01.1985	Nil	22201-6199215-7	36	18-02-2020	Ex-Khasadar	Head Constable
8.	HC-09	Muhammad Rehman	Din Faraz	01.01.1971	Nil	21708-0379708-1	31	18-02-2020	Ex-Khasadar	Head Constable
9.	HC-09	Abdullah Khan	Khwazla Khan	01.01.1984	10th	11101-3581598-5	30	18-02-2020	Ex-Khasadar	Head Constable
10.	HC-02	Barkat Ullah	Pir Zaid Khan	01.01.1967	Nil	11101-6024073-5	16	18-02-2020	Ex-Khasadar	Head Constable
11.	HC-09	Noor Azim	Mir Hq Nawaz	29.01.1980	8th	11101-8466636-9	12	18-02-2020	Ex-Khasadar	Head Constable
12.	HC-09	Faiz Ullah	Sher Nawaz Khan	17.04.1987	FA	11101-6753033-3	382	18-02-2020	Ex-Khasadar	Head Constable
13.	HC-09	Khalid	Nizam Khan	19.04.1988	Metric	11101-6077656-3	09	18-02-2020	Ex-Khasadar	Head Constable
14.	HC-09	Amin Ullah	Muhammad Gul	10.09.1988	8th	11101-9078325-5	10	18-02-2020	Ex-Khasadar	Head Constable
15.	HC-09	Gul Azim	Mir Hq Nawaz	01.01.1989	N/A	22201-6033311-9	11	18-02-2020	Ex-Khasadar	Head Constable
16.	HC-09	Neham Ali	Awal Rahman	09.01.1989	8th	11101-9178915-9	12	18-02-2020	Ex-Khasadar	Head Constable

M. M. M. M.

M. M. M.

36

37

PEACE STRENGTH RANK WISE DISTRICT BANNU VAZIR SUB DIVISION (FOR TRAINING PURPOSE ONLY)

17	HC-09	M. Ibrahim	Noor Ali	15.01.1989	Matric	11101-8415246-7	13	18-02-2020	Ex-levies	
18	HC-09	Rahmat Ayaz	Toor Ali	15.03.1989	Matric	11101-7038421-7	15	18-02-2020	Ex-levies	
19	HC-09	Saad Ullah Jan	Masrullah Jan	24.04.1989	8 th	11101-8847409-7	16	18-02-2020	Ex-levies	Illiterate
20	HC-09	Sher Abdullah	Sher Azam	01.01.1990	8 th	11101-6803470-5	17	18-02-2020	Ex-levies	Illiterate
21	HC-09	Aman Ullah	Sher Wali Khan	01.01.1990	Matric	11101-2352336-1	18	18-02-2020	Ex-levies	
22	HC-09	Wali Muhammad	Mir Zaman	14.05.1990	Matric	11101-9051805-9	19	18-02-2020	Ex-levies	
23	HC-09	Arman Khan	Haq Dad Khan	20.05.1990	8 th	11101-7575552-1	20	18-02-2020	Ex-levies	Illiterate
24	HC-09	Hamid Khan	Abdul Rashid	21.09.1991	Matric	11101-2667956-7	21	18-02-2020	Ex-levies	
25	HC-09	Sanoor Khan	M. Sharif	01.01.1992	Matric	11101-2360753-5	22	18-02-2020	Ex-levies	
26	HC-09	Ahmed Ullah	Asmat Ullah	08.04.1992	Matric	11101-7488674-9	23	18-02-2020	Ex-levies	
27	HC-09	Sikender Khan	Abdul Jabar	09.03.1992	Matric	11101-7519110-3	24	18-02-2020	Ex-levies	
28	HC-09	Khush Muhammad	Mehar Dil	15.03.1992	FA	11101-3344640-1	25	18-02-2020	Ex-levies	
29	HC-09	Shed Ayaz	Abdul Ghafor Ali	08.09.1992	Matric	11101-1434668-3	26	18-02-2020	Ex-levies	
30	HC-09	Naik Muhammad	Dost Muhammad	01.01.1988	10 th	22201-4524044-1	18	18-02-2020	Ex-Khasadar	
31	HC-09	Shahid Ullah	Gula Band	01.01.1988	FA	22201-8784083-3	10	18-02-2020	Ex-Khasadar	
32	HC-09	Gul Zaman	M Jani	01.01.1986	Nil	12101-1490884-3	33	18-02-2020	Ex-Khasadar	
33	HC-09	Noor Saibiq	Noor Akhni	01.01.1989	8 th	22201-9296441-9	29	18-02-2020	Ex-Khasadar	
34	HC-09	Rahim Ullah	Zaman Jan	01.01.1989	Nil	11101-2149175-1	15	18-02-2020	Ex-Khasadar	
35	HC-09	Asif Mahmood	Sakhi Muhammad	01.01.1989	Nil	11101-6363374-5	22	18-02-2020	Ex-Khasadar	
36	HC-09	Said Ullah	Khandan	01.01.1993	Nil	22201-2028374-3	31	18-02-2020	Ex-Khasadar	

M. J. Khan

[Signature]

POLICE STRONGER RANK WISE DISTRICT BANNU WAZIR SUB DIVISION (FOR TRAINING PURPOSE ONLY)

37.	HC-09.	M. Abid Khan	Javed Khan	08.10.1997	BA	11101-8585503-5	28	18-02-2020	Ex-Khasadar	
38.	HC-09	Safir Ullah Khan	Gul Naeik Khan	01.01.1987	Sch	22201-5475977-1	26	18-02-2020	Ex-Khasadar	Illiterate
39.	HC-09	Tariq Noyaz Khan	Kaakar Khan	01.01.2000	Nil	11101-5592484-7	05	16/10/2020	Ex-Khasadar	Illiterate
40.	HC-09	Noor Muhammad	Awaj Khan	05.10.1976	Nil	11101-5085582-3	07	16/10/2020	Ex-Khasadar	Illiterate
41.	HC-09	Irfan Ullah	Shahz Khan	01.01.1992	Nil	11101-6737700-7	21	18/02/2020	Ex-Khasadar	Illiterate
42.	HC-09	Esa Khan	Azai Khan	01.01.1964	Nil	21708-6044306-5	35	18/02/2020	Ex-Khasadar	Illiterate/ 50 Yrs

38

NOOR

NOOR

3

436
Annexure A

39

OFFICE OF THE
DY; SUPERINTENDENT OF POLICE,
CANTT. CIRCLE, BANNU.

Phone No: 0228-9270291.

No. _____ Dated: ___/___/2021.

To: Region Police Officer
Bannu Region, Bannu.

Subject: ENQUIRY

Memo.

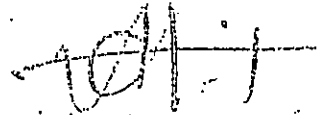
Kindly refer to your office order NO.2220/EC dated 10-06-2021.
Interim report submitted for your kind perusal please

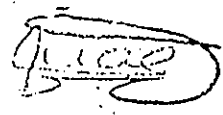
Dy: Superintendent of Police,
Cantt Circle, Bannu

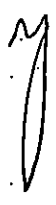
Copy of the above is forwarded to
No: 197-200/c dt: 30-6-21

- 1. SDPO Ruler II
- 2. Head clerk, SP investigation office

Move to P. 113


Dy: Superintendent of Police,
Cantt Circle, Bannu





5 (40)

The Committee comprising of the following officers:-

- (1) Inspector Muhammad Farooq Khan acting SDPO Cantt
- (2) Inspector Rizwan Khan acting SDPO / Rural-II,
- (3) Senior Clerk Javid Khan Head Clerk Investigation Office Bannu

was constituted by order of worthy DIG Bannu Region Bannu vide order No. for the purpose of collecting the entire record in respect of all levies and Khasadar personnel of Sub Division Wazir from DPO Office which is originally sent by APA FR Bannu to DPO Bannu, the record which was sent to the PPO KP and sanctioned/ Notified from Home Department.

The committee obtained the following documents/ information/recommendations from DC Office/DPO Office and sanctions from Home Department. The detail is as under.

The officer recommend by DC / APA Office vide No. 162- 63 -/APA/LC/F-36 dated 17-10-2019 for purpose of absorption in Police Department.

Subject. ABSORPTIN OF LEVIS + HASSADAR

Khasadar		Levies	Total
Utmanzai	Ahmadzai		
335	441	245	1021

1. RECOMMENDATION OF KHASADAR/LEVIES HEAD CONSTABLES AND CONSTABLES FROM DC OFFICE TO DPO BANNU VIDE LETTER NO.162-63/APA/LC/F-36 DATED 17.10.2019

HEAD CONSTABLES = 50
 CONSTABLES = 900
 TOTAL = 950

2. RECOMMENDATION OF HEAD CONSTABLES AND CONSTABLES FROM DPO BANNU VIDE LETTER NO.13608/PA DATED 25-11-2019

HEAD CONSTABLES = 50
 CONSTABLES = 900
 TOTAL = 950

3. NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.472-82 DATED 18-2-2020 AND 483-93 DATED 18-2-2020

HEAD CONSTABLES = 47
 CONSTABLES = 793
 TOTAL = 840

Javed

g

~~40~~ (41)

NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME DEPARTMENT VIDE NOTIFICATION NO.2410-20 DATED 16-10-2020 (Service change)

HEAD CONSTABLES = 04
CONSTABLES = 57 (Service change)
TOTAL = 61

NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME DEPARTMENT VIDE NOTIFICATION NO.87-97 DATED 08-01-2021 (Service change)

HEAD CONSTABLES = 01
CONSTABLES = 43 (Service change)
TOTAL = 44
Grant Total = 105

6. DIRECT NOTIFICATION OF CONSTABLES FROM HOME DEPARTMENT VIDE NOTIFICATION NO.691-700 DATED 07-05-2021

HEAD CONSTABLES = Nil
CONSTABLES = 31 (Khasadar)
TOTAL = 31

7. DIRECT NOTIFICATION OF CONSTABLES FROM HOME DEPARTMENT VIDE NOTIFICATION NO.731-39 DATED 07-05-2021

HEAD CONSTABLES = Nil
CONSTABLES = 01 (LEVIES)
TOTAL = 01

8. SERVICE CHANGE PENDING CASES IN HOME DEPARTMENT, KP

TOTAL = 183

9. NEED TO BE ABSORPTION CASES PENDING IN HOME DEPARTMENT, KP

TOTAL = 19

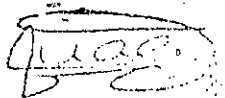
CONCLUSION

It is pertinent to mentioned here that interim report in respect of upper subordinate of Levies and Khasadar has already been submitted in the office of RPO Bannu Region Bannu. However, conclusion is reproduced.

Compendium of the above scenario is that the above mentioned police officials from S.No. 01 -10 are recommended as Constable by the Core committee i.e. DPO Bannu, ADC and Distt Account Officer Bannu while Home Dept accorded their names in the rank of ASI. Furthermore the name of Saddam Hussain was not recommended by the Core committee while Home Dept included his name in aforementioned notification as ASI.

Moreover: the list / all Notifications mentioned above received from Home Dept need verification.

y



ORIG.

(49)

"H"

In compliance with the directions passed by Worthy Regional Police Officer, Bannu Region, Bannu vide Ex: No. 5909/EC dated 17.11.2021 and in the light of suspicious notification of Govt. of Khyber Pakhtunkhwa, Home and Tribal Affairs Department vide No. SO(Police) HD /SMI 2019 Merged Area 691-700 dated 07.05.2021 regarding the absorption of 31 Khasadars in Police Force as well as 10 personnel of Ex-Khasadars were notified as ASIs vide notification No. SO(Police) HD /SMI 2019 Merged Area/87-87, dated 02.01.2021 from S.No.01 to 10 and 01 personnel of Ex-Khasadar notified as ASI vide notification No. SO(Police) HD /SMI 2019 Merged Area/2410-20, dated 19.10.2020 at S.No.05 in contravention to the schedule (Rule-3(b)) of KP Khasadar Absorption Rules Act 2019 which needs to be properly verified from the Home Department Peshawar. The services of all the personnel under notification No. mentioned above are hereby suspended as well as made non-functional till the arrival of proper verification from Home Department Peshawar with immediate effect.

OS No. 1971

Dated 25 / 11 / 2021

District Police Officer,
Bannu.

No. 8236 / dated, Bannu the 25 / 11 / 2021

Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu w/r to his office Ex: No. quoted above.

2. All concerned for necessary action.

District Police Officer,
Bannu.

7

42-I

H-I

Better Copy

ORDER:

In compliance with the directions issued by Worthy Regional Police Officer, Bannu Region Bannu vide Endst: No. 5609/EC dated 17.11.2021 and in the light of suspicious notification of Govt: of Khyber Pakhtunkhwa, Home and Tribal Affairs Department vide No. SO (Police) HD/SMI 2019 Merged Area 691-700 dated 07.05.2021 regarding the absorption of 31 Khasadar in Police Force as well as 10 personnel of Ex-Khasadar were notified as ASIs vide Notification No. SO (Police) HD/SMI 2019 Merged Area 87-97, dated 08-01-2021 from S. No. 01 to 10 and 01 personnel of Ex-Khasadar notified as ASI vide Notification No. SO (Police) HD/SMI 2019 Merged Area 2410-20, dated 16-10-2020 at serial No. 05 in contravention to the schedule (Rule-3(b)) of KP Khasadar Absorption Rules Act 2019 which needs to be properly verified from the Home Department Peshawar. The services of all the personnel under notification No. mentioned above are hereby suspended as well as made non-functional till the arrival of proper verification from Home Department Peshawar with immediate effect.

OB No. 1371

Dated 25/11/2021

**District Police Officer,
Bannu.**

No. 8836/dated, Bannu the 25/11/2021

Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu w/r to his office Endst: No, quoted above.

2. All concerned for necessary action.

2

**District Police Officer,
Bannu.**

D

~~43~~

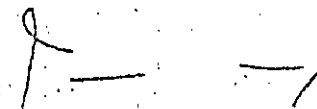
43

I

ORDER

In compliance with the directions of Regional Police Officer, Bannu Region, Bannu vide Endst: No.5609/EC dated 17.11.2021, a committee comprising of Mr. Rizwan Khan, SDPO Rural Circle-II Bannu and Mr. Javed Iqbal, Head Clerk of this office is hereby constituted for the purpose to carry out verification of the following notifications received to this office from Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar regarding absorption of Ex-Khasadar/levies Force in Police:

1. No. SO(Police) HD /SMY2019 Merged Area 2410-20 dated 16.10.2020 (65 individuals)
2. No. SO(Police) HD /SMY2019 Merged Area 87-97 dated 08.01.2021 (54 individuals)
3. SO(Police) HD /SMY2019 Merged Area 691-700 dated 07.05.2021 (31 individuals)

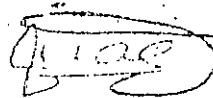

District Police Officer
Bannu

9004-8 /dated, Bannu the 01/12/2021.

Copy of above is submitted for favour of information to:
The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
The Regional Police Officer, Bannu Region, Bannu w/r to his office Endst: 5609/EC dated 17.11.2021.
The Section Officer Levies & Khasadar, Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar.
The committee members for necessary action and compliance.

move to 116





District Poli

ORDER

43-1

1-1

Better copy

In compliance with the directions of Regional Police Officer, Bannu Region Bannu vide Endst: No. 5609/EC dated 17.11.2021, a committee comprising of Mr. Rizwan Khan, SDPO Rural Circle-II Bannu and Mr. Javed Iqbal, Head Clerk of this office is hereby constituted for the purpose to carry out verification of the following notifications received to this office from Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar regarding absorption of Ex-Khasadar/Levies force in Police:

1. No. SO (Police) HD/SMY 2019 Merged Area 2410-20 dated 16.10.2020.
2. No. SO (Police) HD/SMY 2019 Merged Area 87-97 dated 08.01.2021.
3. No. SO (Police) HD/SMY 2019 Merged Area 691-700 dated 07.05.2021 (31 individuals).

District Police Officer

Bannu

9004-8/dated, Bannu the **01/12/2021**.

Copy of above is submitted for favour of information to:

1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. The Regional Police Officer, Bannu Region Bannu w/r to his office Endst: No. 5609/EC dated 17.11.2021.
3. The Section officer Levies & Khasadar, Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar.
4. The Committee members for necessary action and compliance.

District Police Officer

Bannu





GOVERNMENT OF KHYBER PAKHTUNKHWA
Home & Tribal Affairs Department

No. SO(Police)HD/SMY 2019/ Merged Area/1353-36
Dated: 06.12.2021

District Police Officer,
Bannu Sub Division.

Subject: ORDER

I am directed to refer to your office order No. 9004-8 dated 01.12.2021 and to convey that the Committee comprising of Mr. Rizwan Khan SDPO Rural Circle-II Bannu and Mr. Javed Iqbal Head Clerk DPO Bannu office visited the office of Section Officer (Levy & Khassadars) Home & Tribal Affairs Department for the purpose. The Committee was provided relevant record pertaining to the below mentioned Notifications and verified the same:

1. No. SO(Police)/HD/SMY-2019/Merged Area/2410-20 dated 16.10.2020.
2. No. SO(Police)/HD/SMY-2019/Merged Area/87-97 dated 08.01.2021.
3. No. SO(Police)/HD/SMY-2019/Merged Area/691-700 dated 07.05.2021.

Endst No. & date even.
Copy to the:

1. Regional Police Officer Bannu Region, Bannu.
2. PS to Secretary Home & TAs Department, Khyber Pakhtunkhwa.
3. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa.
4. Master File.

Section Officer
(Levy & Khassadar)

[Handwritten signature]

Reference Attached.

45

J-I

Respected Sir,

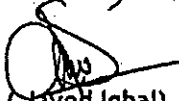
In compliance with the directions vide Order Endst:No.9004-8, dated 01.12.2021, we, the committee members visited the Office of Section Officer (Levies & Khasadars) Home and Tribal Affairs Department on 06.12.2021 for the purpose to verify the following suspicious notifications of Home Department regarding absorption of Ex- Khasadars/ Levies force in Police Force.

1. No.SO(Police)HD/SMY 2019 Merged Area/2410-20 dated 16.10.2020 (65 individuals) .
2. No.SO(Police)HD/SMY 2019 Merged Area/87-97 dated 08.01.2021 (54 individuals)
3. SO(Police)HD/SMY 2019 Merged Area/691-700 dated 07.05.2021 (31 individuals)

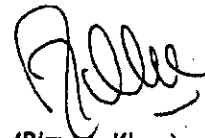
The verification process was carried out as follows:

- a) Dispatch register of the office of Section Officer (Levies & Khasadars) Home Department was checked with regard to the numbers issued depicted on the notifications which were found correct.
- b) Every single notification received in this office from the Home Department was comparatively checked by name of individuals as well as their designation/ ranks and dispatched numbers which were found correct.
- c) An authentication letter regarding verification of these notifications was also obtained from the Office of the Section officer (Levies & Khasadars) Home Department, placed on file.
- d) Attested photocopies of all the three notifications were also obtained from the Section Officer office (Levies & Khasadars) Home Department, placed on file.

Report is submitted please.



(Javed Iqbal)
S.Clerk, Head Clerk
to:DPO Bannu.

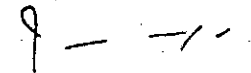


(Rizwan Khan)
SDPO Rural-II
Circle Bannu.

OFFICE OF THE DISTRICT POLICE OFFICER, BANNU.

No. 9360, dated Bannu the 14-12 /2021.

Copy of committee report is submitted to the Regional Police Officer, Bannu Region, Bannu with regard to the verification of above suspicious notifications from the office of Section Officer office (Levies & Khasadars), Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar alongwith relevant record for perusal and order w/r to his office Endst:No.5609/EC, dated 17.11.2021, please.


District Police Officer,
Bannu.

From: The Regional Police Officer,
Bannu Region, Bannu

(46) K

To: The District Police Officer, Bannu

No. 793 /EC, dated Bannu, the 23 /02/2022

Subject: ORDER/VERIFICATION OF SUSPICIOUS NOTIFICATIONS FROM HOME
& TRIBAL AFFAIRS DEPARTMENT KP

Memo:

Reference your office letter No.1051/SDW dated 17.02.2022.

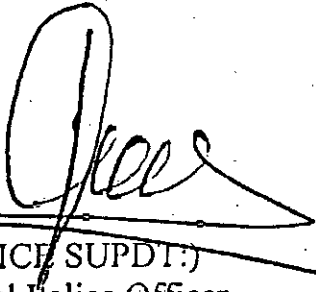
After perusal of the case, the Regional Police Chief has recorded the following remarks on it;-

"As they have been lawfully absorbed in Police Department in BS-11 by Home Department, therefore proceed as per law on the subject".

*SRC (SDW)
For information &
action.*

District Police Officer
BANNU

24/02/2022



(OFFICER SUPDT.)
For Regional Police Officer,
Bannu Region, Bannu

7

ORDER

B (47)

WA
14/1

In compliance with Regional Police Officer, Bannu Region, letter No.793/EC, dated 23.02.2022 and in the light of proper verification carried out by the Office of Section Officer (Levies & Khasadars) Govt: of Khyber Pakhtunkhwa, and Tribal Affairs Department vide his office letter No. SO(Police) HD /SMY 2019 /Merged Area/ 1333-36, dated 06.12.2021 of the suspicious notifications vide No. SO(Police) HD /SMY 2019 Merged Area/ 691-700, dated 07.05.2021 regarding the absorption of 10 personnel of Ex-Khasadars were notified as Khasadars in Police Force as well as 10 personnel of Ex-Khasadars notified as ASI vide notification No. SO(Police) HD /SMY 2019 Merged Area/87-97, dated 08.01.2021 and 01 personnel of Ex-Khasadar notified as ASI vide notification No. SO(Police) HD /SMY 2019 Merged Area/2410-20, dated 16.10.2020 at S.No.05, the suspension of all the personnel under notification Nos. mentioned above are hereby restored as well as made functional from the date of suspension i.e. dated 25.11.2021 with immediate effect.

OB.No. 267

Dated 24/02/2022

District Police Officer,
Bannu

Phone No: 0928-9270038.

Fax No: 0928-9270045

Email: dpobannu2@gmail.com

No. 1270-74 /SRC(SDW) dated Bannu the, 25/2/2022.

Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu w/r to his office letter No. quoted above.

2. All concerned for necessary action.

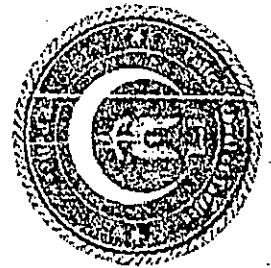
Move to 146

District Police Officer,
Bannu

146



CERTIFICATE



Reg No. 0812

This is to certify that

Mr. Shah Hussain Dist: Bannu

has participated Successfully completed 10 Days

“Target Hardening & Tactical Planning Course for Field Commanders”

held at Police School of Tactics, Hakim Abad Nowshera.

From 28.02.2022 to 11.03.2022

SUMAIRA QADIR
Deputy Inspector General of Police,
Training,
Khyber Pakhtunkhwa, Peshawar

[Signature]
Director
Police School of Tactics,
EPTC Nowshera.



OFFICE OF THE
ADDITIONAL SUPERINTENDENT OF POLICE,
BANNU

No. 224 / ASP

Dated 24 / 08 / 2022

To: The District Police,
Bannu

Subject: PROBE INTO SUSPICIOUS / CONTRVERSIAL NOTIFICATIONS

Memo:

Kindly refer to DPO office order No. 3639-42/SRC/SDW, dated 11.08.2022, on the subject noted above.

Respected Sir,

In compliance with your kind directives, the committee members thoroughly checked the office record of DPO office, Bannu, in respect of the concerned suspicious/controversial induction of individuals of Sub-Division Wazir in Bannu Police and are unanimously agreed upon the following conclusions:

CONCLUSIVE SUMMARY REPORT REGARDING PARA 1:

The induction of 11 officials in the rank of ASIs (BPS-11) consisting of --10 officials vide notification No.SO(Police)HD/SMY 2019 merged Area/S7-97, dated 08.01.2021 (from serial No. 1 to serial No. 10) and 01 official (Muhammad Tahir) vide notification No.SO(Police)HD/SMY 2019 merged Area/2410-20, dated 16.10.2020 mentioned at serial No. 5 is totally wrong, fake and forged (Though verified from the Home and Tribble Affairs Department as true) on the following grounds:

1. Neither the DPO office Bannu had sent/recommended the under-discussion 11 names of individuals of Khasadar Force of Wazir Sub-Division for their absorption in the Rank of ASI (BPS-11) nor their names had been recommended by the DC/APA office, Bannu for their absorption in the rank of ASIs. Some hidden hands of the CPO clerical staff and Home Department with mutual connivance and mala-fide intention have included these (11) names for their (illegal, illogical and irrational) absorption in the rank of ASIs. Similarly, no scrutiny committee (comprising DPO, DC/AC/APA & DAO) had recommended these names for their absorption in the rank of ASIs. Perhaps the hidden hands have also prepared their fake scrutiny committee reports bearing fake signatures of the committee-members for giving it a legal cover.

more to 158

2. Soon after the merger, the Assistant Commissioner, Sub-Division Wazir, Banna vide his office letter No.162-63/APA/LC/F-36, dated 17 October, 2019 sent the list of Levies and Khasadar of Sub-Division Wazir for their absorption in Police (copy attached). This list consists of 1021 individuals out of which 776 are Khasadars and 245 are Levies. This list denotes:
- i Abdullah S/O Abdul Janan on serial No. 186 for absorption in the rank of Head Constable;
 - ii Hamayun Khan S/O Rawal Khan on serial No. 105 for absorption in the rank of Head Constable;
 - iii Hassan Gul S/O Adam Gul on serial No. 106 for absorption in the rank of Naik;
 - iv Shah Hussain S/O Akhtar Munir on serial No. 119 for absorption in the rank of Constable;
 - v Mukhtar Ullah S/O Mashat Khan on serial No. 172 for absorption in the rank of Constable;
 - vi Javid Iqbal S/O Dawood Khan on serial No. 179 for absorption in the rank of Constable;
 - vii Hafecz ur Rehman S/O Nazar Gul on serial No. 421 for absorption in the rank of Constable;
 - viii Mushahid ul Wadood S/O Fazal Wadood on serial No. 425 for absorption in the rank of Constable;
 - ix Rahmat Ali S/O Zakim Khan on serial No. 439 for absorption in the rank of Constable;
 - x Zar Ali S/O Mir Qazi Bat Khan on serial No. 131 for absorption in the rank of Constable (service changed with Muhammad Tahir S/O Khushdil Khan).

Note: Ironically, the name of Saddam Hussain S/O Akhtar Munir does not exist in this list, at all.

3. In light of the above mentioned letter No. 162-63/APA/LC/F-36, dated 17.10.2019, the government of Khyber Pakhtunkhwa Home & Tribal Affairs Department issued notification No.SO(Police)HD/SMY 2019 Merged Area/483-93, dated 18.02.2020 (copy attached) regarding the absorption of 614 individuals of Khasadar Force. This list bears the names of:

- i Hamayun Khan S/O Rawal Khan on serial No. 20 and his absorption in the rank of Head Constable (BPS-09);
- ii Abdullah S/O Abdul Janan on serial No. 27 and his absorption in the rank of Head Constable (BPS-09);

[Handwritten signature]

- iii Shah Hussain S/O Akhtar Munir on serial No. 225 and his absorption in the rank of Constable (BPS-07);
- iv Mukhtar Ullah Khan S/O Mashat Khan on serial No. 301 and his absorption in the rank of Constable (BPS-07);
- v Javid Iqbal S/O Dawood Khan on serial No. 312 and his absorption in the rank of Constable (BPS-07);
- vi Hafcez ur Rehman S/O Nazar Gul on serial No. 596 and his absorption in the rank of Constable (BPS-07);
- vii Mushahid ul Wadood S/O Fazal Wadood on serial No. 600 and his absorption in the rank of Constable (BPS-07);
- viii Rahmat Ali S/O Zakim Khan on serial No. 612 and his absorption in the rank of Constable (BPS-07);
- ix Zar Ali S/O Mir Qazi Bat Khan on serial No. 245 and his absorption in the rank of Constable (BPS-07) (service changed with Muhammad Tahir S/O Khushdil Khan).

Note: This list also does not bear the name of Saddam Hussain, at all, because he is/was not even a member of Khasadar, Levy or Police Force.

4. After that a notification No.SO(Police)HC/SMY 2019 Merged Area 2410-20, dated 16.10.2020 was received from Home and Tribal Affairs Department which wrongly bears the name of Muhammad Tahir S/O Khushdil Khan on serial No. 5 and his absorption in the rank of ASI (BPS-11) (copy attached) as the DPO office had not recommended his name for his absorption in the rank of ASI. Muhammad Tahir is neither a member of Khasadar Force/Levy Force nor Police Force. The above mentioned facts had already been communicated to CPO vide DPO office, Bannu, letter No. 13924 dated 28.10.2020 (copy attached) but in vain. He is an outsider and has managed his induction in Police Force as ASI through back doors. He is also involved in forgery and cheating. For giving legal cover to his illegal gotten Police service vide notification mentioned above dated 16.10.2020, he managed his service change with one Zar Ali S/O Mir Qazi Bat Khan after 04 days i.e on 20.10.2020. The service of Zar Ali has already been terminated vide DPO office, Bannu, letter No. 3639/SRC/OHC.SDW, dated 29.04.2021 (copy enclosed).

CONCLUSIVE SUMMARY REPORT REGARDING PARA 2:

1. Though verified as true from the Home and Tribal Affairs Department, KP, yet notification No.SO(Police)HD/SMY 2019, Merged Area/691-700, dated 07.05.2021, regarding the absorption of 31 Khasadar Force of Sub-Division Wazir into KP Police is totally wrong, fake and fabricated. These names had neither been recommended by the DPO office or any scrutiny committee nor sent by the APA/DC office, Bannu, for absorption in police. Some hidden hands of the CPO clerical staff and Home Department with mutual connivance and mala-fide intention have prepared a fake, illegal and illogical list of 31 individuals for their absorption in the rank of Constables. No scrutiny committee (comprising DPO, DC/AC/APA & DAO) had recommended these names for their absorption in police. Perhaps the hidden

hands had also prepared their fake scrutiny committee reports bearing fake signatures of the committee members.

RECOMMENDATIONS:

Keeping the above facts and figures in view, the committee members unanimously recommend the following recommendations:

- I. The Home and Tribal Affairs Department, Khyber Pakhtunkhwa may please be approached through proper channel to issue corrigendum in notification No.SO(Police)HD/SMY 2019, Merged Area/87-97, dated 08.01.2021 and exclude the names from serial No. 1 to 10, as their absorption has already been notified in their original/actual ranks. Second absorption is absurd and any absorption above the original ranks is in contrary to the dictum of equivalency of Khasadar Act. While, the remaining names from serial No. 11 to 54 are correct.
- II. Similarly, a corrigendum is required by the Home and Tribal Department in notification No.SO(Police)HD/SMY 2019, Merged Area/2410-20, dated 16.10.2020, regarding the exclusion of the name of Muhammad Tahir S/O Khushdil Khan (mentioned at serial No. 5).
- III. Likewise, the Home and Tribal Department, KP may please be approached to issue cancellation of the notification No.SO(Police)HD/SMY 2019, Merged Area/691-700 dated 07.05.2021 regarding the absorption of 31 men, being totally wrong.
- IV. The Worthy DPO, Bannu is requested not to take any step regarding the absorption of 31 individuals in police department as the concerning notification No.SO(Police)HD/SMY 2019, Merged Area/691-700, dated 07.05.2021 is falsely prepared by some secret hands with mala fide intention.
- V. The worthy DPO, Bannu, is also requested to withdraw/rescind the consequential proceedings on the unauthorized second absorption of the officials mentioned at serial No.1 to 9 vide Home and Tribal Affairs Department notification No.SO(Police)HD/SMY 2019, Merged Area/87-97, dated 08-01-2021 and official mentioned at serial No.05 vide Home and Tribal Affairs Department notification No.SO(Police) HD/SMY 2019, Merged Area/2410-20, dated 16-10-2020 in the rank of ASIs. The ranks and salary of individuals mentioned at serial No. 1 to 9 may please be fixed in accordance with the original ranks of first absorption vide notification No.SO(Police) HD/SMY 2019, Merged Area/483-93, dated 18-02-2020 tabulated as under:

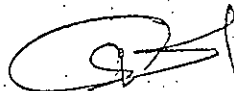
S.#	Name & Father's Name	Previous rank	Rank in which absorbed
20	Hamayun Khan S/O Rawal Khan	Havaldar	HC (BPS-9)
27	Abdullah S/O Abdul Janan	Havaldar	HC (BPS-9)
41	Hassan Gul S/O Adam Gul	Naik	B-1 pass Constable (BPS-7)
225	Shah Hussain S/O Akhtar Munir	Khasadar	Constable (BPS-7)


301	Mukhtar Ullah Khan S/O Mashat Khan	Khasadar	Constable (BPS-7)
312	Javid Iqbal S/O Daud Khan	Khasadar	Constable (BPS-7)
596	Hafiz Rehman S/O Nazar Gul	Khasadar	Constable (BPS-7)
600	Mushahid ul Wadood S/O Fazal Wadood	Khasadar	Constable (BPS-7)
612	Rahmat Ali S/O Zakim Khan	Khasadar	Constable (BPS-7)

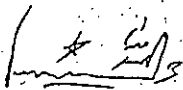
They are also recommended for departmental proceedings being involved in cheating, dishonesty and forgery.

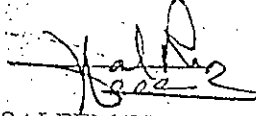
- VI. Sadam Hussain S/O Hunar Khan mentioned at serial No.10 of the notification No.SO(Police) HD/SMY 2019, Merged Area/87-97, dated 08-01-2021, and Muhammad Tahir Khan S/O Khushdil Khan mentioned at serial No. 5 vide Home and Tribal Affairs Department notification No.SO(Police) HD/SMY 2019, Merged Area/2410-20, dated 16-10-2020 are totally outsiders and private persons and their absorption could not be warranted under any law. They are not members of Khasadar Force, Levy Force or Police Force. Their names have neither been recommended by the APA office nor sent to CPO by the DPO office, Bannu. Their names are also not been recommended by the authorized scrutiny committee. They have managed the induction of their names through back-doors with mala fide intention. Being outsiders private persons and involved in cheating, dishonesty and forgery, a criminal case is recommended to be registered against them, with their immediate removal from service and recovery of salaries.
- VII. A high level enquiry at CPO level is recommended to be conducted for tracing out the hidden hands in the whole game.

Submitted please.

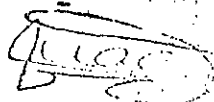

 SHAHID ADNAN
 DSP HQrs: Bannu


 MUHAMMAD FAROOQ KHAN
 SI Legal, Bannu


 FARHAT ULLAH
 OHC, SDW, Bannu


 SALEEM RIAZ
 Additional Superintendent of Police,
 Bannu

3



As per the recommendation of inquiry committee report NO. 224/ASP dated 24.08.2022 constituted vide this office Order No.3639-42 dated 11.08.2022 the following officials were notified as ASIs vide Home Department Notification No. SO(Police)HD/SMY 2019 Merged Area/87-97 dated 08.01.2021 through fictitious, fraudulent means and based on deception as their names had neither been sent by Deputy Commissioner Office/AC SDW/ Bannu nor recommended by scrutiny committee (comprising DPO Bannu, DC/AC/APA Bannu, DAO Bannu) for absorption as ASIs as the officials at Sr No. 1 to Sr No. 9 were initially absorbed as Constables/ Head Constables and then directly notified/absorbed as ASIs by Home Department Khyber Pakhtunkhwa while officials at Sr No. 10 and 11 were not even members of Khasadar/Levies Force as indicated in the table below :

S#	Name of Official	Absorbed/Notified as Constable/ Head Constable vide Notification No. & Date	Absorbed/Notified as ASIs vide Notification No. & Date	Remarks
1	Hamayun s/o Rawal Khan	No.SO(Police)HD/SMY 2019 Merged Area/483-93, dated 18.02.2020	No.SO(Police)HD/SMY 2019Merged Area/87-97, dated 08.01.2021	He was initially absorbed as Head Constable and later on fraudulently absorbed as ASI
2	Abdullah s/o Abdul Janan	-do-	-do-	He was initially absorbed as Head Constable and later on fraudulently absorbed as ASI
3	Hussan Gul s/o Adam Gul	-do-	-do-	He was initially absorbed as B-1 Constable and later on fraudulently absorbed as ASI
4	Shah Hussain s/o Akhtar Munir	-do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
5	Mukhtar Ullah s/o Mashat Khan	-do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
6	Javid Iqbal s/o Daud Khan	-do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
7	Hafiz Rehman s/o Nazar Gul	-do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI

ORDER:

As per the recommendation of inquiry committee report No. 224/ASP dated 24.08.2022 constituted vide this office Order No. 3639-42 dated 11.08.2022, the following officials were notified as ASIs vide Home Department Notification No. SO (Police) HD/SMY 2019 Merged Area 87-97 dated 08.01.2021 through fictitious, fraudulent means and based on deception as their names had neither been sent by Deputy Commissioner Office/AC SDW Bannu nor recommended by scrutiny committee (comprising DPO Bannu, DC/AC/APA Bannu, DAO Bannu) for absorption as ASIs as the officials at Sr No.1 to 9 were initially absorbed as Constables/Head constables and then directly notified/absorbed as ASIs by Home Department Khyber Pakhtunkhwa while officials at Sr No. 10 and 11 were not even members of Khasadar/Levies Force as indicated in the table below:

S#	Name of Official	Absorbed/Notified as Constable/Head Constable vide Notification No. & Date	Absorbed/Notified as ASIs vide Notification No. & Date	Remarks
1	Hamayun S/o Rawal Khan	No. SO (Police) HD/SMY 2019 Merged Area/483-93 dated 18.02.2020	No. SO (Police) HD/SMY 2019 Merged Area 87-97 dated 08.01.2021	He was initially absorbed as Head Constable and later on fraudulently absorbed as ASI
2	Abdullah S/o Abdul Janan	-do-	-do-	He was initially absorbed as Head Constable and later on fraudulently absorbed as ASI
3	Hassan Gul S/o Adam Gul	do-	-do-	He was initially absorbed as B-1 Constable and later on fraudulently absorbed as ASI
4	Shah Hussain S/o Akhtar Munir	do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
5	Mukhtar Ullah S/o Mashat Khan	do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
6	Javed Iqbal S/o Daud Khan	do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
7	Hafiz Rehman S/o Nazar Gul	do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI

55

60

8	Mushahid ul Wadood s/o Fazal Wadood	-do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
9	Rahmat Ali s/o Zakim Khan	-do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI.
10	Saddam Hussain s/o Hunar Khan	Nil	-do-	He was neither a member of Khasadar/Levies Force neither his name had been sent by DC Bannu/ AC SDW Bannu office nor his name had been recommended by Scrutiny/Committee (comprising DPO Bannu, DC/AC/APA Bannu, DAO Bannu) for absorption as ASI and even as Constable
11	Muhammad Tahir s/o Khusdil Khan	Nil	No.SO(Police)HD/SMY 2019Merged Area/2410- 20, dated 16.10.2020	He was neither a member of Khasadar/Levies Force neither his name had been sent by DC Bannu/ AC SDW Bannu office nor his name had been recommended by Scrutiny Committee (comprising DPO Bannu, DC/AC/APA Bannu, DAO Bannu) for absorption as ASI. However, he managed his service change with one Zar Ali s/o Mir Qazi Bai Khan after 04 days (i.e. on 20.10.2020) of his fraudulent notification as ASI

2

55-1

Better copy

8	Mushahid Wadood S/o Fazal Wadood	-do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
9	Rehmat Ali S/o Zakim Khan	-do-	-do-	He was initially absorbed as Constable and later on fraudulently absorbed as ASI
10	Saddam Hussain S/o Hunar Khan	Nil	-do-	He was neither a member of Khasadar/Levies Force neither his name had been sent by DC Bannu/AC SDW Bannu office nor his name had been recommended by scrutiny committee (comprising DPO Bannu /DC/AC/APA Bannu, DAO Bannu) for absorption as ASI and even as Constable.
11	Muhammad Tahir S/o Khushdil Khan	Nil	No. SO (Police) HD/SMY 2019 Merged Area 2410-20 dated 16.10.2020	He was neither a member of Khasadar/Levies Force neither his name had been sent by DC Bannu/AC SDW Bannu office nor his name had been recommended by scrutiny committee (comprising DPO Bannu /DC/AC/APA Bannu, DAO Bannu) for absorption as ASI. However, he managed his service change with one Zar Ali S/o Mir Qazi Bat Khan after 04 days (i.e. on 20.10.2020) of his fraudulent notification as ASI.

3

56

In the light of above names of ASIs Saddam Hussain and Muhammad Tahir are hereby struck off from this District Police and their salaries are stopped immediately and to recover through legal means, while the following officials are reverted to their original Ranks as below and should be proceeded departmentally:

#	Name of official	Present Rank	Reverted to the Rank as mentioned in Home Department Notification No. SC (Police)HD/SMY 2019 Merged Area/483-93, dated 18.02.2020
1	Hamayun Khan s/o Rawal Khan	ASI	HC (BPS-09)
2	Abdullah s/o Abdul Janan	-do-	HC (BPS-09)
3	Hassan Gul s/o Adam Gul	do-	B-1 Constable (BPS-07)
4	Shah Hussain s/o Akhtar Munir	-do-	Constable (BPS)
5	Mukhtar Ullah s/o Mashat Khan	do-	Constable (BPS)
6	Javid Iqbal s/o Daud Khan	-do-	Constable (BPS)
7	Hafiz Rehman s/o Nazar Gul	do-	Constable (BPS)
8	Mushahid ul Wadood s/o Fazal Wadood	-do-	Constable (BPS)
9	Rahmat Ali s/o Zakim Khan	do-	Constable (BPS)

Moreover, any consequential proceedings after their appointment notification/orders as ASIs is void Ab initio, and considered to be withdrawn.

O.D NO. 944

dated: 01/09/2022.

District Police Officer
Bannu

No. 3897-3906 dated: 01/09/2022

Copy of above is submitted to:

1. The Regional Police Officer Bannu Region, Bannu for favor of information.
2. The Deputy Inspector General of Police HQr CPO, Peshawar for favor of information.
3. The Assistant Inspector General of Police Establishment CPO, Peshawar.
4. The Assistant Inspector General of Police (NMDs) CPO, Peshawar.
5. The Additional SP Bannu Chairman Inquiry Committee constituted vide this office Order No.3639-42 dated 11.08.2022.

6. The District Accounts Officer, Bannu
7. Head Clerk DPO Office, Bannu.
8. SRC/OHC SDW, Bannu
9. SRC/OHC District Bannu.
10. Pay Officer

} For necessary action and correction of record

56-1

Better copy

In the light of above names of ASIs Saddam Hussain and Muhammad Tahir are hereby struck off from this District Police and their salaries are stopped immediately and to recover through legal means, while the following officials are reverted to their original Ranks as below and should be proceeded departmentally:

S#	Name of official	Present Rank	Reverted to the Rank as mentioned in Home Department Notification No. SO (Police) HD/SMY 2019 Merged Area/ 483-93, dated 18.02.2020
1	Hamayun S/o Rawal Khan	ASI	HC (BPS-09)
2	Abdullah S/o Abdul Janan	-do-	HC (BPS-09)
3	Hassan Gul S/o Adam Gul	-do-	B-1 Constable (BPS-07)
4	Shah Hussain S/o Akhtar Munir	-do-	Constable (BPS-07)
5	Mukhtar Ullah S/o Mashat Khan	-do-	Constable (BPS-07)
6	Javed Iqbal S/o Daud Khan	-do-	Constable (BPS-07)
7	Hafiz Rehman S/o Nazar Gul	-do-	Constable (BPS-07)
8	Mushahid Wadood S/o Fazal Wadood	-do-	Constable (BPS-07)
9	Rahmat Ali S/o Zakim Khan	-do-	Constable (BPS-07)

Moreover, any consequential proceedings after their appointment notification/orders as ASIs is Void Ab initio, and considered to be withdrawn.

O.B No. 944

dated: 01/09/2022

District Police Officer, Bannu

No. 3897-3906 dated: 01/09/2022

Copy of above is submitted to:

1. The Regional Police Officer, Bannu Region Bannu for favour of information.
2. The Deputy Inspector General of Police HQr CPO, Peshawar for favour of information.
3. The Assistant Inspector General of Police Establishment CPO, Peshawar.
4. The Assistant Inspector General of Police (NMDs) CPO, Peshawar.
5. The Additional SP Bannu Chairman Inquiry Committee constituted vide this office order No. 3639-42 dated 11.08.2022.
6. The District Account Officer, Bannu.
7. Head Clerk DPO Office, Bannu.
8. SRC/OHC SDW, Bannu.
9. SRC/OHC District Bannu.
10. Pay Officer.

(57)

of Police
11/6

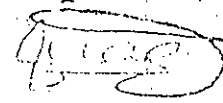
BEFORE THE WORTHY REGIONAL POLICE OFFICER BANNU REGION BANNU

Subject: Departmental Appeal for cancellation/set-aside the impugned inquiry No. 224/ASP dated 24/08/2022 and subsequently impugned order No. 944 dated 01/09/2022 vide which the appellant has illegally been reverted from ASI (BPS-11) to Constable (BPS-07) issued by District Police Officer Bannu.

Respected Sir,

It is humbly requested with profound respect, the appellant most earnestly seeks permission to submit as under;

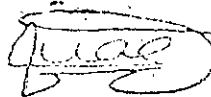
1. That initially the appellant was serving in Levies/Khasadar force of Wazir Sub-Division and subsequently merged in Khyber Pakhtunkhwa Police Department District Bannu in the year 2019.
2. That the appellant was absorbed as ASI (BPS-11) vide Notification No. SO (Police) HD/SMY 2019 Merged Area/87-97 dated 08/01/2021 by Secretary Home and Tribal Affairs Department. (Copy of Notification dated 08/01/2021 is attached as Annexure-A)
3. That after absorption as ASI, the appellant was performing his duties as ASI and is regularly receiving his salary since 08/01/2021 till date.
4. That the then RPO Bannu constituted the inquiry committee regarding Absorption in Levies/Khasadar and comprising Inspector Muhammad Farooq Khan SDPO (Chairman), Inspector Rizwan Khan SDPO/Rural-II and Senior Clerk Javed Khan Head Clerk as members and they filed the inquiry report vide No. 197-200 dated 30/06/2021. (Copy of Inquiry dated 30/06/2021 is attached as Annexure-B)





5. That suddenly the then District Police Officer (DPO) Bannu suspended the service of the appellant vide order No. 8836 dated 25/11/2021 till the arrival of proper verification from Home Department, Peshawar. (Copy of Suspension order dated 25/11/2021 is attached as Annexure-C)
6. That in this regard the then District Police Officer (DPO) Bannu constituted the committee vide order No. 9004-8 dated 01/12/2021 comprising of Mr. Rizwan SDPO Rural Circle-II Bannu and Mr. Javed Iqbal Head Clerk DPO Office for the purpose to carry out verification. (Copy of order dated 01/12/2021 is attached as Annexure-D)
7. That the Section Officer (Levy & Khasadar) Home and Tribal Affairs Department vide order No. SO (Police) HD/SMY 2019 Merged Area/1333-36 dated 06/12/2021 and stated therein that Mr. Rizwan SDPO Rural Circle-II Bannu and Mr. Javed Iqbal Head Clerk DPO Office visited the office of the undersigned and the committee was provided relevant record and verified the same. (Copy of order dated 06/12/2021 is attached as Annexure-E)
8. That in the light of letter No. 793/EC dated 23/02/2022 received from RPO office Bannu Region Bannu with the following remarks recorded by the RPO Bannu Region Bannu;

"As they have been lawfully absorbed in Police Department in BPS-11 by Home Department, therefore proceed as per law on the subject". (Copy of order dated 23/02/2022 is attached as Annexure-F)
9. That in compliance with the Worthy RPO order dated 23/02/2022 and in the light of the proper verification carried out, the appellant is hereby restored w.e.f (Suspension date) i.e. 25/11/2021 by the then District Police Officer Bannu vide order No. 1270-74/SRC(SDW) dated

J


25/02/2022. (Copy of restoration order dated 25/02/2022 is attached as Annexure-G)

10. That all of a sudden once again when the matter was resolved by high-ups, the District Police Officer Bannu vide impugned order dated 11/08/2022 constituted the committee regarding probe into suspicious/controversial notifications and they recommended that the absorption of the appellant is contrary to the Khasadar Act. (Copy of impugned inquiry committee dated 24/08/2022 is attached as Annexure-H)
11. That in the light of the recommendations raised by the inquiry committee, the District Police Officer Bannu issued an impugned order No. 3897-3906 dated 01/09/2022 and awarded the major penalty by reverted the service of the appellant from ASI (BPS-11) to Constable (BPS-07). (Copy of impugned reversion order dated 01/09/2022 is attached as Annexure-I)
12. That the impugned order No. 3897-3906 dated 01/09/2022 is illegal, unlawful, unnatural, void-ab-initio, null and void in the eye of law, hence liable to be declared so.
13. That the fundamental rights of the appellant has blatantly violated by issuing the impugned order No. 3897-3906 dated 01/09/2022 and the appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
14. That without given any notice or given an opportunity of personal hearing and issuance of impugned order No. 3897-3906 dated 01/09/2022 is the clear cut violation of Right to fair trial i.e. Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973 and also against the settled norms of service laws/rules prescribed for all the institutions.

3

UAG

- 15. That the appellant is being harassed and has been vexed twice for double punishment, which is against the mandate of Article 13 of the Constitution of Islamic Republic of Pakistan, 1973.
- 16. That if the appellant is being reverted to constable then the dignity of the appellant will be in danger in the Police department as well as in the entire society.

PRAYER IN APPEAL:-

It is therefore, most humbly prayed that, on acceptance of this appeal, the impugned inquiry committee recommendations dated 24/08/2022 and impugned reverted order No. 3897-3906 dated 01/09/2022 from ASI (BPS-11) to Constable (BPS-07) being illegal, unlawful, unconstitutional, void-ab-initio, and the appellant may kindly be re-instated to the service to the actual rank ASI (BPS-11) with all back benefits to meet the ends of justice.

Appellant
Shah Hussain S/o Akhtar Munir ASI (BPS-11)
Sub Division Wazir

Dated: 12/09/2022

SRC SDW

For m/a & further due process.

12/9/2022



(61) - here

GOVERNMENT OF KHYBER PAKHTUNKHWA
Home & Tribal Affairs Department

Dated 10/11/2022

NOTIFICATION

1498-1503

No.SO(Police)HD.SMY/Notification/1498-1503/. The Competent Authority has been pleased to constitute an inquiry committee comprising of the following officers to dig out the real facts existing into the absorption case of Ex-Khasadars/levies Force in Khyber Pakhtunkhwa Police Department vide Notifications, No.SO (Police)HD/ SMY 2019 Merged Area/691-700 dated 07-05-2012 and SO (Police)HD/ SMY 2019 Merged Area/87--97 dated 08-01-2021

Sl.No.	Name & Designation	Status
1	Mr. Umar Nawaz Khan Deputy Secretary (Judicial) Home Department	Chairman
2	Registrar office of Provincial Police Office	Member
3	District Police Officer Bannu	Member
4	Assistant Commissioner Sub Division Wazir Bannu	Member
5	District Accounts Officer Bannu	Member

TORs of the inquiry committee are as under:-

- i. To identify the real individual/culprits involved in malpractice.
- ii. To pinpoint the persons from grass route level who initiated the process of absorption of the above levies personnel in Police.
- iii. To ascertain the quantum of financial loss sustained by Govt. in shape of payment of salaries
- iv. Any other point the committee may like to consider.

The committee will submit its finding to the competent authority within Fifteen days (15) after issuance of this notification, please.

Secretary Home & TAs

Copy to:

1. Mr. Umar Nawaz Deputy Secretary (Judicial) Home Department.
2. All Members of the inquiry committee
3. PS to Secretary Home & Tribal Affairs Department
4. PS to Special Secretary-II Home Department

Section Officer (L&K)

62

In the event of joining or carrying on any other profession, service or business, the holder will not be entitled to use this card and shall forthwith surrender it to the KP Bar Council

Father's Name: RAUF ULLAH KHAN
Address: DISTRICT COURTS BANNU


Contact No: 0332-9745361
Enrolment Date L.C: 16-February-2018
Enrolment Date H.C: 29-April-2020
Place of Practice: BANNU
Date of Birth: 23-October, 1995
Blood Group: B+VE
C.NIC No: 11101-7059645-1

Card No: 27544

KHYBER PAKHTUNKHWA BAR COUNCIL
Bar Council Building, Khyber Road, Peshawar, Ph: 091-4211172, 9212415, Fax: 091-4213814
Email: support@kpbarcouncil.com, www.kpbarcouncil.com

KHYBER PAKHTUNKHWA BAR COUNCIL

YASIR RAUF WAZIR
Advocate
Bc-20-2895
Date of Issue: February 2022
Valid upto: February 2025



Acting Secretary
KP Bar Council

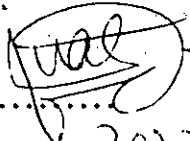
ADVOCATE HIGH COURT

قیمتی **وکالت نامہ** قیمتی

بعدالت منجانب: **شاہ حسین**
صوبائی کورٹ سسر وین ٹریبونل لیسٹاور
نام: **صوبائی کورٹ سسر وین ٹریبونل لیسٹاور**
عنوان مقدمہ: **رٹ پٹیشن / فوجداری اپیل / اسول اپیل / متفرق CM**
باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا ہم اپنی طرف سے واسطے پیروی وجود ہی اور دیگر کل کاروائی کیلئے برائے
مقام: **لیسٹاور** یا **سرووف وزیر ایڈووکیٹ ہائی کورٹ**

کو وکیل مقرر کر کے اختیار دیتے ہیں کہ میری / ہماری جناب سے مقدمہ مذکورہ کی پیروی وجود ہی کرے۔ راضی نامہ کرے، فیصلہ ثالثی کرائے کہ فیصلہ کرانے پر حلف منظور کرے ہر قسم کا بیان دیوے، ہر قسم کے سوال و جواب کرے، عرضی دعویٰ کرے جواب دعویٰ، اپیل جواب الجواب، عذرات، نگرانی، نظر ثانی، درخواست ہائے متفرق اور دیگر ہر قسم کے دستاویزات تحریر و تصدیق کر کے داخل کرے، واپس لیوے، دست برداری کرے، ترمیم کرے، ہر قسم رقوم مقدمہ، جرمانہ، ہر جانہ داخل اور وصول کرے، ہر قسم دستاویز جو بعد م پیروی ڈسکس ہو سربز کرے۔ کاروائی، ڈگری یکطرفہ منسوخ کرے۔ اجراء ڈگری کرے۔ زرڈگری وصول کرے۔ قبضہ جائیداد لیوے دیوے۔ اپنے ہمراہ ایڈووکیٹ بیرسٹریا مختار قانون برائے جزوی یا کل کاروائی مقرر کرے علیحدہ کرے۔ دوران مقدمہ اگر جرمانہ، ہر جانہ فریق مخالف سے وصول ہو، وہ حق وکیل صاحب کا ہو گا۔ اگر پیشی ایسے مقام پر ہو جو صدر مقام سے دور ہو تو وکیل صاحب پیروی کے ذمہ دار نہ ہونگے۔ اس سلسلے میں جملہ ساختہ ووبرداختہ وکیل صاحب موصوف منظور و قبول ہو گا۔ لہذا وکالت نامہ ہذا لکھ دیا کہ سندر ہے۔ نیز وکیل موصوف کو میری جانب سے مقدمہ فوجداری و مال میں بھی مکمل کاروائی کرنے کا مکمل اختیار با مضمون بالا حاصل ہو گا۔

Attested: 
مورخہ: **13** ماہ: **12** سال: **2022**

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

0332-9745361 Yasir.rauf.1995@gmail.com

السید المعبد