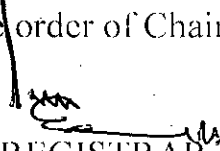


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 1906 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/12/2022	<p>The appeal of Mr. Nisar Muhammad Khan resubmitted today by Mr. Muhammad Abdullah Baloch Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Nisar, Muhammad Khan, DSP, Presently Acting S.P Motor Transport Peshawar received today i.e. on 12.12.2022 is incomplete, on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Addresses of respondent no. 6 to 12 are incomplete which may be complete according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 4- Page no. 12, 13, 31, 42 to 45 are illegible which may be replaced by legible/better one.

No. 35563 /S.T,

Dt. 12/12 /2022


Zanaira Kanwal Adv.  
High Court D.I.Khan

R/sir,

After rectifying/correcting deficiencies i.e.  
(i) check list has been attached.  
(ii) objection # 2 + 3 + 4 has also been removed.

Re-submitted please.

*Zanaira Kanwal*  
Adv. High Court.  
D.I.Khan  
cell: 0313-9343379

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
CHECK LIST

Case Title: M. Nisar Muhammad Khans

1906/22  
Govt of KPK etc

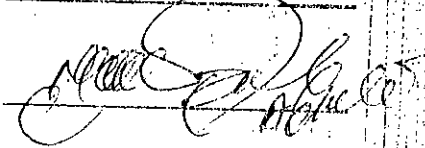
S.#	Contents	Yes	No
1.	This appeal has been presented by: _____		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?		
5.	Whether the enactment under which the appeal is filed is correct?		
6.	Whether affidavit is appended?		
7.	Whether affidavit is duly attested by competent authority 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 A G/D A G?	✓	
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 cuttings/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:

Muhammad Abdullah Baloch (AWC)

Signature:



Dated:

\_\_\_\_\_

**BEFORE THE NWFLP SERVICES TRIBUNAL, PESHAWAR**

In Service Appeal No. 906 /2022

**Nisar Muhammad Khan**  
**(Appellant)**

Versus

**Govt; of KPK etc**  
**(Respondents)**

**INDEX**

S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit	--	01-06
2.	Copy of memo No. 5427/EXAM dated 22/11/1994	A	07-13
3.	Copy of Order Endst: No. 3161-62/ES dated 30/12/1998	B	14
4.	Copy of Order 1891-94/ES dated 30/12/1998	C	15
5.	Copy of Office order NO. 911-13 dated 17/04/2004.	D	16
6.	Copy of Order No. 1718-24 Bannu dated 25/08/2006	E	17
7.	Copy of the impugned seniority list	F	18-25
8.	Copies of departmental appeal	G	26-28
9.	Copies of appeal and judgment	H	29-40
10.	Copies of the orders	I	41-47
11.	Vakalatnama	--	

Dated: 12 /12/2022

Your humble appellant

**Nisar Muhammad Khan**

Through counsel

**Muhammad Abdullah Baloch**  
**Advocate High Court**

*Adv. Zainab*  
**Zainab Kanwal**  
**(Advocate High Court)**

**BEFOORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

SERVICE APPEAL NO. 1906 /2022

**Nisar Muhammad Khan, Deputy Superintendent of Police presently posted as Acting SP Motor-Transport Peshawar.**

**Appellant**

VERSUES

1. Govt; of Khyber Pakhtunkhwa through the Chief Secretary,  
Govt: of Khyber Pakhtunkhwa, Peshawar.
2. The Secretary to the Govt; of Khyber Pakhtunkhwa, Home and Tribal Affairs  
Department, Peshawar.
3. The Provincial Police Officer, Central Police Office, Peshawar.
4. The Addl: Inspector General of Police, Head Quarters, CPO, Peshawar.
5. Regional Police Officer, Bannu Range Bannu.
6. Mr. Syed Mukhtiar Shah presently posted as DPO at Torghar.  
Mob No. 03413982229
7. Mr. Nazir Ahmad presently posted as SP /CTD at Abattabad .  
Mob. No. 03145009400
8. Mr. Saeed Akhtar presently posted as SP/Inv Khyber. .  
Mob. No. 0333-5136020.
9. Mr. Muhammad Ishtiaq presently posted as SP Investigation Abbattabad  
Mob. No. 03018119988.
10. Mr. Muhammad Maroof presently posted as SP Head quarters Elite Force, Head  
Quarter Peshawar. Mob No.0333-9107445
11. Mr. Muhammad Ayaz presently posted as Addditional SP Operation at Haripur.  
Mob No. 0300-5611595.
12. Mr. Muhammad Jamil Akhtar presently posted as Addditional SP at Mansehra.  
Mob. No. 0345-6095496.

.....**Respondents**

**SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974**  
**AGAINST FINAL SENIORITY LIST ISSUED VIDE NOTIFICATION OFFICE NO.**  
**1594/SE-1 DATED 05/08/2022 (SENIORITY LIST) WHEREIN THE**  
**APPELLANT'S NAME HAS WRONGLY BEEN SHOWN AT SERIAL NO. 83.**  
**BESIDES APPEAL AGAINST THE INDICISION OF THE DEPARTMENTAL**  
**APPEAL OF THE APPELLANT..**

**Note:** That the addresses of the Parties given in the heading of the  
Petition are true and correct for the purpose of service.

**Respected Sir;**

1. That the appellant is serving as Deputy Superintendent of Police (BS-17)  
and currently posted as Acting SP Motor-Transport Peshawar.

BEFOORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

SERVICE APPEAL NO. \_\_\_\_\_/2022

Nisar Muhammad Khan, Deputy Superintendent of Police presently posted as Acting SP Motor-Transport Peshawar.

Appellant

VERSUES

1. Govt; of Khyber Pakhtunkhwa through the Chief Secretary, Govt: of Khyber Pakhtunkhwa, Peshawar.
2. The Secretary to the Govt; of Khyber Pakhtunkhwa, Home and Tribal Affairs Department, Peshawar.
3. The Provincial Police Officer, Central Police Office, Peshawar.
4. The Addl: Inspector General of Police, Head Quarters, CPO, Peshawar.
5. Regional Police Officer, Bannu Range Bannu.
6. DSP Syed Mukhtiar Shah
7. DSP Nazir Ahmad
8. DSP Saeed Akhtar
9. DSP Muhammad Ishtiaq
10. DSP Muhammad Maroof
11. DSP Muhammad Ayaz
12. DSP Muhammad Jamil Akhtar

Respondents

*Adv. Zain  
Khan*

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974  
AGAINST FINAL SENIORITY LIST ISSUED VIDE NOTIFICATION OFFICE NO.  
1594/SE-1 DATED 05/08/2022 (SENIORITY LIST) WHEREIN THE  
APPELLANT'S NAME HAS WRONGLY BEEN SHOWN AT SERIAL NO. 83.  
BESIDES APPEAL AGAINST THE INDICISION OF THE DEPARTMENTAL  
APPEAL OF THE APPELLANT.

**Note:** That the addresses of the Parties given in the heading of the Petition are true and correct for the purpose of service. (Respondents No. 06 to 12 would be served through respondent No. 4).

**Respected Sir;**

1. That the appellant is serving as Deputy Superintendent of Police (BS-17) and currently posted as Acting SP Motor-Transport Peshawar.

2. That the appellant was appointed as Assistant Sub Inspector (BS-9) in KPK Police Department on the recommendation of KPK Public Service Commission on 01/01/1995 in Bannu region. In the merit list assigned by the Public Service Commission, the appellant stood at Serial No.32 in the merit Order vide secretary Public Service Commission, NWFP, Peshawar memo No. 5427/EXAM dated 22/11/1994. Copy is annexed as "Annexure-A".
3. That after completion of successful probation period, the appellant was confirmed as ASI effective from the date of appointment i.e 01/01/1995 vide Regional Police Officer Bannu Region Order Endst: No. 3161-62/ES dated 30/12/1998. Copy is annexed as "Annexure-B".
4. That in spite of having unblemished service and in the absence of anything adverse, the appellant was belatedly brought on list "E" on 13/07/2001 vide Regional police office bannu Region Order No. 1891-94/ES dated 20/07/2001 instead of from the date of confirmation i.e 30/12/1998. Copy of Order 1891-94/ES dated 30/12/1998 is annexed as "Annexure-C". After that the appellant was consider suitable for promotion as Offg; sub-inspector vide office order NO. 911-13 dated 17/04/2004. Copy is annexed as "Annexure-D". After that the appellant was belatedly promoted in substantive rank of sun-inspector vide Office Order No. 1718-24 Bannu dated 25/08/2006. Copy is annexed as "Annexure-E".
5. That the appellant was not given inter-se seniority among his batch mates as per merit assigned by KP public service Commission. And due to late confirmation as SI seniority of appellant was disturbed which might be a clerical mistake, which travelled along the seniority of the appellant and culminated in to final seniority list issued vide impugned seniority list No. 1594/SE-I dated 05/08/2022. That name of the appellant was wrongly shown at serial No. 83, below the name of Mr Mujeeb ur Rahman and above the name of Mr. Rahmat Ullah, while the officers junior to the appellant are placed at serial No. 37 to 44 (the officials recruited in 1998 batch) Copy of the impugned seniority list is annexed as "Annexure-F".
6. That after the issuance of impugned seniority list dated 05/08/2022, being continuance cause of action, the appellant preferred a departmental appeal on 12/08/2022. Copy of a departmental appeal is annexed as "Annexure-G".
7. That uptill now no response has been shown from the respondents and after the laps of statutory limitation of departmental appeal, cause of action

*Adv. Zayyaf  
Bannu*

has been accrued to the appellant, hence, the instant service appeal, inter alia on the following grounds.

**GROUND**

1. That the Appellant has not been provided equal treatment when there is no express inhibition against him under the law and has also not been given equal protection of law, which is discriminatory instance of arbitrariness and is against the principles enshrined in Articles-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
2. That the Appellant has been subjected to injustice and the case of Appellant has not been dealt with under the principle of the fair play.
3. That the impugned notification (seniority list) of the respondents and also the procedure adopted is wrong in the exercise of jurisdiction is in excess of jurisdiction and misapplication of clear rules.
4. That the impugned seniority list is against the settled laws and rules of Seniority in service and no legal footings hence ineffective upon the rights of appellant.
5. That it has been clearly the mandate of law and the verdicts of the Apex Courts that discretion should be excised fairly and justly and should not be exercised arbitrarily. The belated entry of the appellant in list "E" is discriminatory and infringed the rights of the appellant. Hence, the impugned seniority list is in violation of rules and statutory provisions as well as the dicta of superior courts pronounced in a number of judgments, hence the same needs to be corrected.
6. That the Appellant is to be placed at his proper and due position in seniority list after rectifying the office order No. 1891-94 bannu dated 20/07/2001 and all other subsequent notifications/orders qua the appellant. Further seniority position of the appellant also deserves rectification on the basis of merit list assigned by Public Service Commission, Peshawar (inter-se seniority with batch-mates).
7. That the impugned seniority list is apparently based on error and a blatant proof of erroneous reckoning of seniority in the impugned list is that even those inducted in service much later than the appellant are placed at serial No 37 to 44 and thus much above the appellant.
8. That after the confirmation as ASI vide Office Order No. 3161-62 dated 30/12/1998, effective from date of appointment i.e 01/01/1995, the appellant was brought into list "E" with effect from 13/07/2001 and not from the date of confirmation as ASI i.e 01/01/1995 and due to this the appellant became junior even among his batch-mates. Thus, the

*Adv. Zen  
Khan*



discretion of the competent authority to brought name of police official in to list "E" was not exercised according to justice and was discriminatory

9. That vide Merit Order of secretary Public Service Commission, NWFP, Peshawar memo No. 5427/EXAM dated 22/11/1994, one Mr Abdul Hai Khan was stood at top i.e serial No.1 in DIKhan Region. His seniority was disturbed due to late confirmation in the rank of Sub Inspector and due to not maintaining the merit assigned by Public Service Commission with his batch-mates. The official preferred a service appeal No. 991/2018, titled "Abdul Hai Khan DSP Vs Govt; of KPK". The Worthy Service Tribunal established that Civil Servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter-se seniority as in the lower post. Let it not be mentioned here that Mr. Abdull Hai and the appellant belongs to the same batch. The service appeal No. 991/2018 was accepted vide judgment dated 17/12/2020. Copy of appeal and judgment is annexed as "Annexure H". In consequence the promotion list "E" in DIKhan region has been revised. Copies of Order No. 3448-55 and 3456-SE and order No. 3457-64 and Order No.3488-96 and Order No. 3477-86 all dated 30/05/2022 and Order No. 4570-78/ES and Order No. 4580-88/ES both dated 30/06/2022 are annexed as "Annexure I".
10. That by dint of judgment of the Worthy Service Tribunal dated 17/12/2020 in Service appeal No. 991/2018 DIKhan region has revised and corrected Office Notification No. 622/ES dated 25/04/1998, the date of bringing the name of Mr. Abdull Hai, along with his batch-mates, on the promotion list "E" has been revised in the light of PR. 13.11 and 19.25(5). Thus to eliminate the discrimination office notification No1891-04/ES (entry to list "E") deserves revision and correction.
11. That in view of the Rule 17 sub rule 1 (a) of the KP Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 'The Seniority inter se of civil servants shall be determined in case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission.'
12. That also according to the Rule 2 (2) of the Civil Servants (Seniority) Rules, 1993 "If two or more persons are recommended in open advertisement by the Selection Authority their inter-se seniority shall be determined in order of merit assigned by the selection authority".
13. That as per Rule 17 (2) of the KPK Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 "Seniority in the various cadres of the civil servants appointed by initial recruitment vis-a vis those appointed

*Ash Zain  
Lawyer*

otherwise shall be determined with reference to their dates of their regular appointment to a post in that cadre”.

14. That according to Section 8 (4) of the KPK Civil Servant Act, 1973, “Seniority in a post, service or cadre to which a civil servant is promoted shall take effect from date of regular (initial) appointment”.
15. That the appellant is entitled for equal treatment as per Article 25 of the Constitution of Islamic Republic of Pakistan and his Seniority may be considered from the merit list of the Public Service Commission, Peshawar as per dictum laid down by the superior courts.
16. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under Appeal.
17. That the counsel for Petitioner/ Appellant may be allowed to argue additional grounds at the time of arguments.

It is, therefore, humbly prayed that on gracious acceptance of the instant Service Appeal, the impugned Final Seniority list dated 05/08/2022 may please be set aside/nullified and the appellant may be declared and placed at his proper position in accordance with seniority rules. On acceptance of this appeal the impugned Notification No. 1718-24/ES dated 25/08/2006 may kindly be modified to the extent of confirmation of the appellant with his batch-mates and from the date when his other colleagues/juniors were confirmed as SI with further rectification of notification No.1891-94/ES Bannu dated 20/07/2001 (entry to list “E”) and with further correction of confirmation as Inspector and DSP with his colleagues and for due place in promotion list. The appellant may kindly be treated equally as per law with his batch-mates most particularly as Mr. Abdul Hai (appellant in Appeal No,991/2018 dated 17/12/2020). Any other relief deems fit appropriate in given circumstances may also be granted in larger interest of justice.

Yours Humble Appellant

(Nisar Muhammad Khan)  
Through Counsel

Dated: 12/12/2022

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

Adv. Zunaira Kanwal  
Zunaira Kanwal  
(Advocate High Court, D.I.Khan)

BEFORE THE NWFLP SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. \_\_\_\_\_/2022

Nisar Muhammad Khan  
(Appellant)

Versus

Govt; of KPK etc  
(Respondents)

VERIFICATION

Verified on oath at DIKhan, this \_\_\_\_\_<sup>th</sup> day of December, 2022,  
that all contents of the above appeal are true and correct.


\_\_\_\_\_/12/2022

Appellant

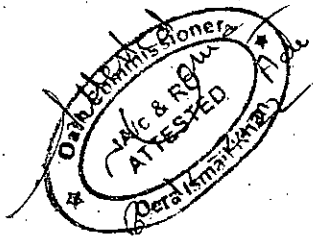
AFFIDAVIT

I, Nisar Muhammad Khan, appellant herein, do hereby solemnly affirm on oath that all parawise contents of the accompanying appeal are true and correct to the best of my knowledge, belief and information; that nothing has been concealed or kept secret from this worthy Tribunal.

12 /12/2022

  
Deponent

CNIC NO: 11201-0345282-9.  
MOB NO: 03322007953.



ANNEX # 1

Copy of letter No. SO(P,I)HD/3-22/78/1922 dated 6.12.94 from Section Officer (Police-I) Govt: of NWFP Home and Tes Deptt: Peshawar to Inspector General of Police, NWFP, Peshawar.

SUBJECT:- RECRUITMENT OF 54 POSTS OF ASSISTANT SUB-INSPECTOR OF POLICE IN N.W.F.P.

Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of letter No. 4527 EXAM dated 27.11.94 with request that further necessary action may please be taken under intimation to this Department.

OFFICE OF THE INSPECTOR GENERAL OF POLICE, N.W.F.P., PESHAWAR.

NO. 25719-25/E-II, Dated Peshawar the 13-12-94.

Copy of above together with its enclosures is forwarded for information and necessary action to:-

1. The DIG of Police, Peshawar Range, Peshawar.
2. The DIG of Police, Kohat Range, Kohat.
3. The DIG of Police, Hazara Range, Abbottabad.
4. The DIG of Police, Malakand Range, Swat.
5. The DIG of Police, D.I.Khan Range, D.I.Khan.
6. The DIG of Police, Mardan Range, Mardan.
7. The DIG of Police, Bannu Range, Bannu.

2320/Es  
 13/12/94  
 SIKANDAR MOHAMMADZAI

The appointments may be allocated to the Districts of your Ranges and the Districts SPs concerned be directed to issue their appointment orders/ Notifications.

Encl: 2

3-12/95 F

( SIKANDAR MOHAMMADZAI )  
 DIG/HQRS:  
 FOR INSPECTOR GENERAL OF POLICE,  
 NWFP, PESHAWAR.

13/12/94

"AMENGIL"

After trial to be trial  
 copy. [Signature]

Telephone No. 274499

Confidential.

To :- Secretary,  
Public Service Commission  
Peshawar Cantt:..

To :- The Secretary,  
Govt: of NWFP  
Home and Tribal Affairs Deptt:  
Peshawar.

No. 5427-EXAN

Dated 27.11.1994.

Subject:- RECRUITMENT OF 54 POSTS OF ASSISTANT SUB-INSPECTOR  
OF POLICE IN N.W.F.P.

Sir,

With reference to the correspondence resting with your letter No. SO(P.I)HD/5-22/8.13.3 dated 4.11.1993 on the subject noted above, I am directed to state that the Commission recommends the following for appointment as Assistant Sub-Inspector of Police:-

Range	Merit Order	Recommendee	Domicile
Peshawar			
(Number of Vacancies:8)			
"	8	Jamroz Khan S/O Ismail Khan	Khyber Agency
"	17	Asfandiyar Khan S/O Samiullah Khan	Charsadda
"	19	Sabir Khan S/O Awal Khan (Ex-Servicemen)	Peshawar.
"	20	Afrasyab Hussain Mirza S/O Zafaroyab Hussain Mirza	Peshawar.
"	37	Saifur Rehman S/O Mira Khan	F.R.Peshawar.
"	41	Nisar Ahamed Khan S/O Nosruminallah	Mohmand Agency
"	43	Tariq Iqbal S/O Mohammed Yousaf	Peshawar.
"	52	Tariq Habib S/O Nisar Habib	Peshawar
Range	MERIT ORDER	RECOMMENDED	DOMICILE
Mardan			
(Number of Vacancies:12)			
"	7	Abdul Naeem S/O	Mardan
"	11	Shaukat Ali S/O Amnallah	Swabi
"	14	Nisar Mohammed S/O Wali Mohammed	Swabi

*Attached to be  
Exec copy*

Range	Merit Order	Recommendee	Domicile
"	18	Sajjad Ahmad S/O Abdul Khaliq	Swabi
"	24	Fazle Rabbi S/O Fazle Elahi	Swabi
"	29	Ashfaq Ahmad S/O Zainul Abidin	Swabi
"	30	Abdus Samad S/O Haji Tawas Khan	Mardan
"	33	Mushtaq Ahmad S/O Mohammed Shah	Mardan
"	35	Shah Hussain S/O Sher Hussain	Mardan
"	46	Muzamil Shah S/O Rahim Dad	Swabi U.S.A.
"	48	Sahibzade Sajjad Ahmad S/O Nisar Mohammed	Swabi
"	59	Nazir Khan S/O Shamshad	Mardan

HAZARA

Number of Vacancies-4

"	2	Muhammad Mohammed S/O Malak Abdul Aziz	Abbottabad
"	4	Tahir Iqbal S/O Mohammed Iqbal	Abbottabad
"	5	Qamar Hayat S/O Heider Zaman	Haripur
"	6	Sahidur Rehman S/O Fazlur Rehman	Haripur

Range	Merit Order	Recommendee	Domicile
-------	-------------	-------------	----------

MALAKAND

Number of Vacancies-2

"	10	Syed Usman Ali Shah S/O Haji Peraz Shah Lala	Swat
"	40	Mohammed Khalid S/O Amir Shah	Chitral

Range Kohat	Merit Order	Recommendee	Domicile
-------------	-------------	-------------	----------

Number of vacancies

"	9	Safdar Khan S/O Abdul Hakim Khan & Kohat	
"	12	Abid Saad Khattak S/O Noor Ali Shah	KORAK
"	21	Ali Gohar S/O Hussain Ghulam	Kuram Agency
"	22	Novved Abbas S/O Riaz Hussain	Kohat

RANGE	MERIT ORDER	RECOMMENDEE	DOMICILE
-------	-------------	-------------	----------

Bannu

Number of Vacancies-7 16

"	3	Mohammed Shafiq Khan S/O Gulab Khan	Bannu
"	16	Azmat Ali Khan S/O Abdul Kerim Khan	Bannu
"	26	Najeebullah S/O Noor Mohammad	Bannu

27	Hanifullah Khan Wazir S/O Abu Khan	F.H. Bannu
31	Ishfaq Ahmad S/O Hammad Khan	Lakki Marwat
32	Nisar Mohammad Khan S/O Gul Mohammad Khan	Lakki Marwat
38	Faridullah S/O Mohammad Nawaz Khan	Bannu
39	Aslam Nawaz S/O Gul Dargaz	Bannu
54	Ismatullah Khan S/O Ghulam Habib Khan	Lakki Marwat
57	Majeedur Rehman S/O Mir Rais Khan	Bannu
58	Mustafa Kamal Pasha S/O Fezal Malook	Bannu
66	Mohammad Tahir Khan S/O Behf Aman Khan	N.W. Agency
71	Mohammad Tahir Shah S/O Mohammad Sadig Khan	F.H. Bannu
73	Mohammad Afzazyab Hassan S/O Mohammad Ali Khan	Bannu
76	Shabir Hussain Shah S/O Malik Mir Shah	Bannu
79	Zafarullah Khan S/O Abdullah Khan	Bannu

RANGE D.I. KHAN      METIR ORDER      RECOMMENDEE      DOMICILE

Number of vacancies-B

1	Abdul Hai, Khan S/O Ahmad Hammad Khan	D.I. Khan
13	Syed Inayat Ali Amjad S/O Syed Muraad Ali Shah	D.I. Khan
15	Kalimullah S/O Hafiz Bashir Ahmad	D.I. Khan
23	Zia Hashiba S/O Gul Hassan	D.I. Khan
25	Sah-ud-Din Arub S/O Rehmatullah Khan	Bank
28	Shahzadullah Khan S/O Amanullah Khan	D.I. Khan
(45)	Mohammad Nadeem Siddiqi S/O Ghulam Yasin	D.I. Khan
(47)	Tauhid Khan S/O Abdul Hamid Khan	D.I. Khan

2- Range-wise adjustment of 54 vacancies is as under:-

	Peshawar	Mardan	Hazara	Malokand Kohat	Bannu	D.I. Khan
Vacancies	8	12	4	2	4	16
Adjusted	8	12	4	2	4	16
Balance	-	-	-	-	-	-

Next Page 3

11

(3)

3. Recommendations in respect of all the recommendees are provisional subject to their medical fitness as prescribed under the rules.

4. Their complete applications in original are attached for your record. please acknowledge.

Yours Obedient Servant

93/-

(ABDUL KHAN)  
DIRECTOR, EXAMINATION  
INDIAN PUBLIC SERVICE COMMISSION.

\*M.L. NGUL\*  
13.12.94

X.L.O.  
-----  
g.l.j



(3)

3- Recommendations in respect of all the recommendees are provisional subject to their medical fitness as prescribed under the rules.

4. Their complete applications in original are attached for your record. please acknowledge.

Your Obedient Servant

SA/-  
( ABDUL HANAN )  
DIRECTOR EXAMINATION  
MMP PUBLIC SERVICE COMMISSION.

\*AMANGUL\*  
13.12.94

XLB  
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ZLB

The Deputy Inspector General of Police,  
Bannu Range, Bannu.

- :- 1) The Superintendent of Police, Bannu.
- 2) ✓ The Superintendent of Police, Lakki.

No. 410-41 /SS Dated Bannu, the 5/1 / 1995.  
 Subject :- DIRECT RECRUITMENT OF ASSTT: SUB INSPECTORS.

MEMORANDUM.


The Public Service Commission N.W.F.P. Peshawar recommended the following candidates for appointment as Probationer Asstt: Sub-Inspectors. They are allotted Range Numbers and posted/ attached to the Districts as noted against each :-

S.I.No.	Name & Address.	Range No. allotted.	Name of District.
1.	Mr. Mohammad Sharif Khan s/o Gulap Khan r/o Mohallah Hussain Abad, House No.469/A, Bannu City.	4/B	Bannu Distt:
2.	Mr. Azmat Ali Khan s/o Abdul Karim Khan r/o Arsala Machan Khel, Ghor-iwala Bannu.	7/B.	-do-
3.	Hajibullah Khan s/o Noor Mohammad r/o Kotka Amin Khan Jabu Khel, Lakki Marwat.	9/B	-do-
4.	Hanifullah Khan Wazir s/o Abu Khan R/o Iqbal Khel Hathi Khel Wazir, F.R. Bannu.	11/B.	-do-
5.	Ishtiaq Ahmed s/o Haqdad Khan r/o Hayat Khel, Lakki Marwat.	14/B.	Lakki Distt:
6.	Miser Mohammad Khan s/o Gul Mohammad, r/o Mohallah Mir Muzaffar Khan, Lakki Marwat.	17/B.	-do- /
7.	Faridullah Khan s/o Mohammad Nawaz r/o Mohallah College Street near, Govt. High School No.2, Bannu City.	23/B	Bannu Distt:
8.	Aslam Nawaz s/o Gul Dargaz r/o Ismail Khel Bannu.	24/B.	-do-
9.	Ismatullah Khan s/o Ghulam Habib Khan, r/o Moh: Lakki Bachan Khel, Lakki.	29/B	Lakki Distt:
10.	Iqjeeb-ur-Rehman s/o Mir Rais Khan, r/o Moh: Rab Nawaz Advocate House No. 156/B, Bannu City.	39/B	Bannu Distt:
11.	Mustafa Kamal Khan Tasha s/o Fazal Malik r/o Kotka Sabta Khel, Bannu.	49/B	-do-
12.	Mohammed Tahir Khan s/o Behr Aman Khan r/o Khaddi, N.W. Agency, Miranshah.	50/B.	-do-


- 13. Mohammad Tahir Shah s/o Mohammad Sadiq Khan, r/o Lakka Teezha, P.R. Bannu. 75/B Bannu Distt: -do-
- 14. Mohammad Afrasayab Hassan s/o Hassan Khan Kotka Sikandar Khan, Bannu. 76/B -do-
- 15. Shabir Hussain Shah s/o Malik Mir Shah, r/o Goraka Saeed Khel, Takki Marwat. 77/B -do-
- 16. Zafrullah Khan s/o Abdullah Khan, Moh: Ghazni Khel, Distt: Bannu. 78/B -do-

All the above Candidates be medically examined and their ~~verification~~ Character be verified through the Local Police. The Distt: S.Ps will issue their appointment orders and Gazette Notification subject to Medical fitness. They may be informed accordingly.

The documents of the above candidates received from C.P.O. Peshawar are sent herewith for record in your office.

  
 ( S. JAMAL SHAH )  
 Dy: Inspector General of Police,  
 Bannu Range, Bannu.

HC/SRL  
 For info +  
 compliance report

  
 Superintendent of Police  
 LAKKI MARWATI  
 8/1/85

BANNU RANGE.

POLICE DEPTT:-

ORDER

On successful completion of their Probationary Period, the following Probationer Asstt. Sub-Inspectors of Bannu Range, are confirmed w.e. from the date of appointment, as noted against each:-

S: NO.	Name & Number.	District.	Date.
1.	PASI AZIZ ALI No. 7/E	Bannu Distt.:	1.1. 1998
2.	" Hanifullah Khan No. 11/B	-do-	-do-
3.	" Faridullah Khan 23/E	-do-	-do-
4.	" Mustafa Kamal Pash 49/B	-do-	-do-
5.	" Mohammad Tahir Khan 50/B	-do-	-do-
6.	" Mohammad Tahir Shah 75/B	-do-	-do-
7.	" Nisar Mohammad Khan 17/B	Lakki Distt.:	-do-
8.	" Iqbalullah Khan 29/B	-do-	-do-
9.	" Shahid Hussain Shah 77/B	-do-	-do-
10.	" Zafrullah Khan No. 78/B.	-do-	-do-

( TARIK UMAR KHITAB )  
Dy. Inspector General of Police,  
Bannu Range Bannu.

No. 3161-62 /ES.

✓ Dated 30-12-1998.

Copies to the:-

1. Superintendent of Police, Bannu
  2. Superintendent of Police, Lakki
- For information and necessary action.

( TARIK UMAR KHITAB )  
Dy. Inspector General of Police,  
Bannu Range, Bannu.

( ABID SAIED )  
Dy. Inspector General of Police,  
Bannu Range, Bannu.

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Adv. Zain  
Khan*

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Amr - C

E

13-7-2001

BANNU RANGE.

ORDER.

Names of the following Asst: Sub-Inspectors of Bannu Range are brought on list " E " with effect from 13-07-2001:-

Sl. No.	Name, rank & No. of Office.	District.
1.	ASI Nisar Mohammad, No. 17/B.	Lakki Marwat.
2.	" Hanifullah, No. 17/B.	Bannu.
3.	" Mohammad Tahir, No. 50/1.	Bannu.
4.	" Mufsoob-ur-Rohman, No. 39/B.	Bannu.
5.	" Mustafa Kamal Feroza, No. 49/B.	Bannu.
6.	" Azmat Ali Khan, No. 7/B.	Bannu.
7.	" Zafrullah Khan, No. 70/B.	Lakki Marwat.
8.	" Mohammad Shafiqat, No. 1/B.	Bannu.
9.	" Mohammed Sahir Shah, No. 75/B.	Bannu.
10.	" Shabir Hussain Shah, No. 77/B.	Lakki Marwat.
11.	" Faridullah Khan, No. 23/B.	Bannu.
12.	" Afrozayab Lodhan, No. 76/B. On deputation to S.B./NWFP.	

( ABID SAIED )  
Dy: Inspector General of Police,  
Bannu Range, Bannu.

No. 1891-94 / ES

Dated: Bannu, the 20-7-2001.

Copies forwarded for information and necessary

action to :-

1. The Superintendent of Police, Lakki Marwat.
2. The Superintendent of Police, Bannu.
3. Dy: Inspector General of Police, Special Branch, NWFP, Peshawar.
4. A.O.S. Police Range Office, Bannu.

( ABID SAIED )  
Dy: Inspector General of Police,  
Bannu Range, Bannu.

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Adv. Zar  
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Inspector of Police,  
Bannu Range, Bannu.

Amir D

POLICE DEPTT.

BANNU REGION.

O R D E R .

The following Asstt. sub\_Inspectors, on promotion list "E" have been considered suitable for promotion as Offg. sub\_Inspectors by the Range selection Board, in the meeting, held in Range Office, Bannu on 08.04.2004.

On promotion, they are posted to Bannu Distt.:

- 1. ASI Nisar Mohammad, No. 17/B. Bannu Distt.:
- 2. " Hanifullah, No. 11/B. Bannu Distt.:
- 3. " Mujeeb\_ur\_Rehman, 39/B. Lakki Distt.:

Their promotion will take effect from the date of taking over charge of their higher responsibilities.

Necessary gazettee notification may be issued to all concerned.

( GHULAM MOHAMMAD KHAN )  
DY: Inspector General of police,  
Bannu Region, Bannu.

No. 911-13 /EC, Dated Bannu, the 17-4-2004.  
Copies to the:-

- 1. Inspector General of police, NWFP, Peshawar for information.
- 2. DY: Inspector General of police, Special Branch, NWFP, Peshawar for information.
- 3. Distt: police officer, Bannu for information & n/action.
- 4). Distt: Police officer, Lakki, for inf. and necessary action.

( GHULAM MOHAMMAD KHAN )  
DY: Inspector General of police,  
Bannu Region, Bannu.

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Adv. Genl  
Kamran

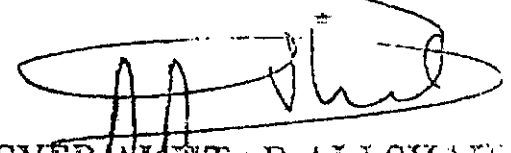
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Annex E

The Departmental Promotion Committee has considered the following Officiating Sub Inspectors on promotion list E of Bannu Region suitable for promotion in the substantive rank of Sub Inspectors in its meeting held on 24<sup>th</sup> of August 2006. They shall remain on a probation period for two years from the date of issuance of this notification. On promotion to the substantive rank they are allotted the following Region Numbers as noted against each.

Necessary Gazette notification be issued with intimation to all concerned.

S.No	Name of Officer and old NO	Allotted Number
1	Mumtaz Khan No 65/B	E/10
2	Said Nawaz No 20/B	B/8
3	Usman Ghani No 16/B	B/19
4	Mohammad Hayat No 7/B	B/18
5	Saadullah No 14/B	B/7
6	Nisar Mohammad No 17/B	B/15
7	Mohammad Tahir No 50/B	B/24



(SYED AKHTAR ALI SHAH)  
PSP, QPM, PPM  
Deputy Inspector General of Police  
Bannu Region Bannu

No 1718-24/EC Dated Bannu, the 25-08-2006.

Copy to:

1. The Provincial Police Officer, NWFP, Peshawar for information.
2. The Additional Inspector General of Police; Investigation NWFP, Peshawar for information.
3. The District Police Officer, Bannu and Lakki for information.
4. The Superintendent of Police Investigation Bannu and Deputy Superintendent of Police Lakki Marwat for information.
5. The Establishment Clerk Regional Office Bannu for information.

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Adv. Zou  
Kamran*



(12)

OFFICE OF THE  
STOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office,  
Peshawar

## FINAL SENIORITY LIST OF DSSP BS-17 OF KHYBER PAHTUNKHWA POLICE

Dated: 25/03/2013

No. 1594/JSE-I, The Final Seniority List of DSSP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
1.	Mr. Qaid Karal	01.01.1963	Charsadda	01.01.1994	01.01.1996	07.11.2012
2.	Muhammad Aleem Jan	11.04.1967	Peshawar	30.01.1996	30.01.1998	24.01.2014
3.	Mr. Aamir Shahzad	09.08.1968	Peshawar	30.01.1996	30.01.1998	30.06.2011
4.	Mr. Muhammad Arif	10.03.1969	Peshawar	30.01.1996	30.01.1998	19.03.2012
5.	Mr. Waqar Ahmad	03.01.1968	Nowshera	01.04.1997	01.04.1999	19.03.2012
6.	Mr. Muhammad Shafiq	13.01.1963	Bannu	01.10.1997	01.10.1999	19.03.2012
7.	Mr. Muhammad Arif	22.04.1964	Bannu	01.10.1997	01.10.1999	07.11.2012
8.	Mr. Gul Naseeb	09.11.1968	Bannu	01.10.1997	01.10.1999	19.03.2012
9.	Mr. Sanaullah	10.01.1969	Lakki	01.10.1997	01.10.1999	31.03.2012
10.	Mr. Amir Muhammad Khan	07.01.1970	Buner	14.10.1997	14.10.1999	19.03.2012
11.	Mr. Ali Hassan	06.03.1965	K.Agency	28.01.1998	28.01.2000	24.08.2020
12.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	20.02.1998	20.02.2000	30.06.2011
13.	Mr. Tahir ur Rahman	28.02.1969	Haripur	20.06.1998	20.06.2000	19.03.2012
14.	Mr. Muhammad Suleman	28.07.1970	Mansehra	20.06.1998	20.06.2000	30.06.2011
15.	Mr. Janas Khan	10.02.1965	Abbottabad	20.06.1998	20.06.2000	20.01.2011
16.	Mr. Zulfqar Khan Jadoon	15.06.1963	Abbottabad	26.05.1987	20.06.2000	25.03.2013
17.	Mr. Asad Mehmood	08.03.1968	Swabi	-	07.09.2000	24.10.2014
18.	Mr. Asif Gohar	07.08.1964	Mansehra	26.04.2000	26.04.2002	20.01.2011
19.	Mr. Tahir Iqbal	20.01.1969	Haripur	25.04.2000	26.04.2002	25.03.2013

Attested & signed  
for copy. Dated: 25/03/2013  
Kamran



Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
20	Mr. Khabir Muhammad	01.01.1972	Abbotabad	26.04.2000	26.04.2002	12.09.2014
21	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	26.04.2000	26.04.2002	08.04.2016
22	Mr. Qamar Hayat	08.04.1971	Haripur	26.04.2000	26.04.2002	07.11.2012
23	Mr. Ijaz Ahmad	05.04.1963	Mansehra	26.04.2000	26.04.2002	12.09.2014
24	Mr. Arshad Mehmood	15.08.1964	Mansehra	26.04.2000	26.04.2002	12.09.2014
25	Muhammad Javed	03.06.1963	Mansehra	26.04.2000	26.04.2002	27.10.2015
26	Mr. Falak Niaz	01.04.1965	Swabi	02.05.2000	02.05.2002	07.11.2012
27	Mr. Talamul Khan	30.09.1965	Swabi	03.07.2000	03.07.2002	24.01.2014
28	Mr. Tariq Habib	05.09.1968	Peshawar	20.09.2000	20.09.2002	31.03.2012
29	Mr. Nisar Ahmad	02.11.1973	Chatsadda	20.09.2000	20.09.2002	31.03.2012
30	Mr. Tariq Iqbal	13.04.1974	Peshawar	20.09.2000	20.09.2002	31.03.2012
31	Mr. Aslam Nawaz	01.03.1972	Bannu	20.09.2000	20.09.2002	31.03.2012
32	Mr. Ishtiaq Ahmad	01.11.1971	Lakki	20.09.2000	20.09.2002	07.11.2012
33	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	29.01.2001	29.01.2003	19.07.2013
34	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	01.06.2001	01.06.2003	25.03.2013
35	Mr. Iftikhar Shah	30.04.1966	Mardan	02.06.2001	02.06.2003	25.03.2016
36	Mr. Noor Jamal	10.01.1966	Mardan	31.07.2001	31.07.2003	31.03.2012
37	Syed Mukhtiar Shah	18.10.1967	Haripur	17.11.2001	17.11.2003	24.01.2014
38	Mr. Nazir Ahmad	02.02.1970	Abbotabad	17.11.2001	17.11.2003	07.11.2012
39	Mr. Saeed Akhtar	02.02.1971	Haripur	17.11.2001	17.11.2003	07.11.2012
40	Mr. Niaz Gul	07.03.1971	Abbotabad	17.11.2001	17.11.2003	24.01.2014
41	Mr. Muhammad Ishtiaq	04.05.1973	Mansehra	17.11.2001	17.11.2003	24.01.2014
42	Mr. Muhammad Maroof	05.10.1974	Abbotabad	17.11.2001	17.11.2003	02.04.2015
43	Mr. Muhammad Ayaz	03.03.1975	Abbotabad	17.11.2001	17.11.2003	07.11.2012
44	Muhammad Jamil Akhtar	22.02.1977	Haripur	17.11.2001	17.11.2003	07.11.2012
45	Mr. Abdul Hai Khan	01.08.1972	D.I.Khan	23.11.2001	23.11.2003	19.07.2013
46	Syed Inayat Ali Shah	10.01.1972	D.I.Khan	23.11.2001	23.11.2003	24.01.2014
47	Mr. Niaz Muhammad	11.02.1971	Swabi	29.11.2001	29.11.2003	25.03.2013
48	Mr. Hameed Ullah	25.04.1974	Mardan	01.12.2001	01.12.2003	24.01.2014
49	Mr. Sajjad Ahmad	01.04.1968	Swabi	01.12.2001	01.12.2003	25.03.2013
50	Mr. Shah Hassan	01.05.1968	Mardan	01.12.2001	01.12.2003	08.04.2013
51	Mr. Nazir Khan	18.10.1970	Mardan	01.12.2001	01.12.2003	19.07.2013
52	Sajjad Ahmad Sahibzada	02.02.1971	Swabi	01.12.2001	01.12.2003	08.04.2013
53	Mr. Muzamil Shah	08.03.1972	Swabi	01.12.2001	01.12.2003	25.03.2013
54	Mr. Mushiq Ahmad	15.03.1970	Swabi	01.12.2001	01.12.2003	25.03.2013

Attested to be  
 true copy  
 Abdul Karim  
 12/03/2013

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
55.	Mr. Shaukat Ali	05.03.1971	Swabi	01.12.2001	01.12.2003	30.11.2012
56.	Mr. Abdul Samad	14.04.1969	Swabi	01.12.2001	01.12.2003	25.03.2013
57.	Mr. Muhammad Khalid	01.01.1970	Chitral	01.12.2001	01.12.2003	24.01.2014
58.	Mr. Zia Hassan	01.11.1974	DIKhan	13.12.2001	13.12.2003	02.01.2014
59.	Mr. Salah-ud-Din	15.01.1970	Tank	24.01.2002	24.01.2004	07.11.2012
60.	Mr. Shafullah	01.04.1971	DIKhan	24.01.2002	24.01.2004	07.11.2012
61.	Mr. Tauheed Khan	20.10.1963	DIKhan	25.01.2002	25.01.2004	19.03.2012
62.	Mr. Rahim Hussain	11.05.1970	Shangla	17.10.2002	17.10.2004	12.09.2014
63.	Mr. Arijad Hussain	24.03.1971	Mansehra	17.10.2002	17.10.2004	12.09.2014
64.	Mr. Murad Ali	09.01.1973	Bannu	30.09.2000	30.09.2002	02.04.2015
65.	Mr. Ali Gohar	23.03.1968	K. Agency	13.01.2003	13.01.2005	02.04.2015
66.	Mr. Habib Ur Rehman	04.03.1966	Mansehra	20.02.2003	20.02.2005	30.09.2016
67.	Mr. Nasir Khan	20.12.1972	Peshawar	20.02.2003	20.02.2005	30.01.2018
68.	Mr. Waqar Ahmad	12.04.1974	Charsadda	01.05.2003	01.05.2005	02.04.2015
69.	Mr. Abdus Salam Khalid	24.06.1976	Lakki	01.05.2003	01.05.2005	25.03.2016
70.	Mr. Sajjad Hussain	23.03.1976	Nowshera	23.06.2003	23.06.2005	02.04.2015
71.	Muhammad Tahir Shah	01.03.1972	Bannu	24.07.2003	24.07.2005	24.01.2014
72.	Mr. Safdar Khan	30.04.1971	Kohat	29.08.2003	29.08.2005	02.04.2015
73.	Mr. Hidayat Ullah Shah	20.04.1965	Swabi	20.12.2003	20.12.2005	25.03.2016
74.	Mr. Shakeel Ahmad	14.04.1969	Charsadda	20.12.2003	20.12.2005	12.09.2014
75.	Mr. Khan Khel	10.04.1969	Mardan	20.12.2003	20.12.2005	24.01.2014
76.	Mr. Muhammad Saeed	04.05.1969	Mardan	20.12.2003	20.12.2005	12.09.2014
77.	Mr. Rashed Iqbal	15.01.1974	Mardan	20.12.2003	20.12.2005	25.03.2016
78.	Mr. Muhammad Fayaz	07.03.1974	Mardan	20.12.2003	20.12.2005	25.03.2016
79.	Ms. Aneela Naz	09.10.1971	Peshawar	01.01.2004	01.01.2006	02.04.2015
80.	Ms. Asmat Ara	15.04.1975	Swabi	01.01.2004	01.01.2006	02.04.2015
81.	Mrs. Shazia Shahid	30.04.1976	Charsadda	01.01.2004	01.01.2006	02.04.2015
82.	Mr. Mujeeb Ur Rehman	02.04.1969	Bannu	08.04.2004	08.04.2006	02.04.2015
83.	Mr. Nisar Muhammad	20.01.1973	Lakki	17.04.2004	17.04.2006	24.01.2014
84.	Mr. Rahmat Ullah	05.03.1971	Nowshera	31.05.2004	31.05.2006	24.10.2014
85.	Mr. Mustafa Kamal Pasha	01.09.1969	Bannu	07.10.2004	07.10.2006	02.04.2015
86.	Mr. Azmat Ali Khan	06.01.1970	Bannu	07.10.2004	07.10.2006	02.04.2015
87.	Mr. Shabir Hussain Shah	15.06.1972	Lakki	07.10.2004	07.10.2006	18.08.2015
88.	Arbab Shafullah Jan	09.10.1966	Peshawar	22.11.2004	22.11.2006	02.01.2014
89.	Mr. Rafullah	12.03.1968	Peshawar	22.11.2004	22.11.2006	02.01.2014

Attached to be  
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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
90.	Muhammad Atiq Shah	01.09.1978	Charsadda	22.11.2004	22.11.2006	06.02.2014
91.	Mr. Yasir Aman	11.08.1970	Peshawar	22.11.2004	22.11.2006	02.04.2015
92.	Mr. Naseer Ali	03.10.1975	Charsadda	22.11.2004	22.11.2006	30.09.2016
93.	Mr. Murad Ali	13.04.1965	Charsadda	22.11.2004	22.11.2006	15.11.2016
94.	Mr. Aurang Zeb	05.01.1970	Mansehra	04.12.2004	04.12.2006	30.09.2016
95.	Mr. Sajjad Haider	20.04.1970	Abbottabad	04.12.2004	04.12.2006	15.11.2016
96.	Mr. Muhammad Ilyas	01.04.1973	Mardan	07.12.2004	07.12.2006	18.08.2015
97.	Mr. Arshad Khan	30.05.1974	Peshawar	08.12.2004	08.12.2006	07.03.2017
98.	Ms. Nazia Naureen	01.12.1970	Abbottabad	09.12.2004	09.12.2006	12.09.2014
99.	Mrs. Shahzadi Noshad	10.04.1972	Hangu	09.12.2004	09.12.2006	12.09.2014
100.	Mr. Alamzeb	12.02.1980	Mardan	23.12.2004	23.12.2006	24.10.2014
101.	Mr. Aqib Hussain	01.04.1965	Kohat	10.01.2005	10.01.2007	18.08.2015
102.	Mr. Falak Nawaz	03.02.1969	Kohat	10.01.2005	10.01.2007	25.03.2016
103.	Mr. Mazhar Jehan	12.12.1970	Kohat	10.01.2005	10.01.2007	24.08.2020
104.	Mr. Khalid Usman	06.01.1967	Karak	10.01.2005	10.01.2007	18.08.2015
105.	Mr. Asad Zubair	15.01.1980	Kohat	10.01.2005	10.01.2007	29.11.2018
106.	Mr. Muhammad Riaz	13.08.1973	Karak	10.01.2005	10.01.2007	24.08.2020
107.	Mr. Zafar Khan	10.01.1963	Buner	16.04.2005	16.04.2007	24.10.2014
108.	Mrs. Rozia Altaf	30.07.1969	Peshawar	13.05.2005	13.05.2007	02.04.2015
109.	Ms. Hamida Bano	04.12.1970	Peshawar	13.05.2005	13.05.2007	02.04.2015
110.	Mr. Muhammad Ismail	12.01.1966	Lakki	07.06.2005	07.06.2007	25.03.2016
111.	Mr. Mehmood Nawaz	07.03.1974	Lakki	02.07.2005	02.07.2007	30.01.2018
112.	Mr. Muhammad Sattar Khan	04.04.1964	Chitral	13.07.2005	13.07.2007	25.03.2016
113.	Mr. Muhammad Zaman	01.01.1965	Buner	13.07.2005	13.07.2007	25.03.2016
114.	Mr. Riaz Muhammad	10.12.1962	Swabi	13.07.2005	13.07.2007	15.11.2016
115.	Mr. Rizwan Habib	19.04.1974	Mansehra	28.12.2005	28.12.2007	12.09.2014
116.	Mr. Jehangir Khan	10.11.1965	Abbottabad	28.12.2005	28.12.2007	24.10.2014
117.	Mr. Shah Murtaz	20.02.1965	Dir Lower	27.05.2006	27.05.2008	30.01.2018
118.	Mr. Zahoor Ahmed	01.01.1980	Dir Lower	27.05.2006	27.05.2008	24.08.2020
119.	Mr. Zafar Ahmad	10.01.1979	Chitral	27.05.2006	27.05.2008	30.01.2018
120.	Mr. Farmanullah	27.10.1978	Dir Lower	27.05.2006	27.05.2008	30.01.2018
121.	Mr. Wahid Ullah	01.04.1981	Dir Lower	27.05.2006	27.05.2008	24.08.2020
122.	Mr. Itikhar Ali Shah	11.05.1976	Bannu	25.08.2006	25.08.2008	15.11.2016
123.	Mr. Amir Hussain	25.05.1965	Swabi	07.11.2006	07.11.2008	30.09.2016
124.	Mr. Sher Afsar	09.02.1963	Swabi	23.11.2006	23.11.2008	29.11.2018

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(22)

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
125.	Mr. Muhammad Rauf	04.04.1963	Mardan	23.11.2006	23.11.2008	25.03.2016
126.	Mr. Rokhan Zeb	07.04.1965	Swabi	18.04.2007	18.04.2009	25.03.2016
127.	Mr. Janzada	01.04.1963	Charsadda	16.07.2007	16.07.2009	25.03.2016
128.	Mr. Zahid Khan	08.04.1967	Mkd. Agency	20.10.2007	20.10.2009	29.11.2018
129.	Mr. Badshah Hazrat	15.02.1969	Dir Lower	20.10.2007	20.10.2009	29.11.2018
130.	Mr. Naveed Iqbal	13.03.1981	Swat	20.10.2007	20.10.2009	29.11.2018
131.	Mr. Ajmal Khan	15.05.1982	Mkd. Agency	20.10.2007	20.10.2009	16.05.2019
132.	Mr. Atiq-ur-Rehman	01.11.1981	Chitral	20.10.2007	20.10.2009	24.08.2020
133.	Mr. Shahid Adnan	27.03.1973	D.I.Khan	03.11.2007	03.11.2009	30.01.2018
134.	Mr. Muhammad Saleem Tariq	01.03.1969	DIKhan	03.11.2007	03.11.2009	29.11.2018
135.	Mr. Gul Shid Khan	01.06.1980	Charsadda	04.11.2007	04.11.2009	30.01.2018
136.	Mr. Shaheen Shah Gohar	03.03.1971	Charsadda	24.11.2007	24.11.2009	07.03.2017
137.	Mr. Gohar Ali	15.11.1974	Peshawar	19.12.2007	19.12.2009	30.09.2016
138.	Mr. Riaz Khan	03.02.1975	Peshawar	19.12.2007	19.12.2009	30.09.2016
139.	Mr. Fazal Wahid	12.01.1971	Malakand	19.12.2007	19.12.2009	30.09.2016
140.	Mr. Amjid Ali	24.04.1969	Swabi	14.03.2008	14.03.2010	30.09.2016
141.	Mr. Izhar Shah	06.03.1966	Mardan	26.03.2008	26.03.2010	30.09.2016
142.	Mr. Sher Rehman	05.04.1964	Mardan	03.04.2008	03.04.2010	15.11.2016
143.	Mr. Jamil-ur-Rehman	16.04.1974	Abbotabad	07.01.2002		12.03.2018
144.	Mr. Muhammad Iqbal	11.02.1963	Mansehra	08.04.2008	08.04.2010	16.05.2019
145.	Mr. Shah Nawaz	06.06.1967	Mansehra	08.04.2008	08.04.2010	24.08.2020
146.	Mr. Muhammad Khurshid	12.01.1963	Mansehra	08.04.2008	08.04.2010	07.03.2017
147.	Mr. Muhammad Altaf	12.03.1969	Haripur	08.04.2008	08.04.2010	30.09.2016
148.	Mr. Fazal Wahid	01.12.1968	Mardan	19.04.2008	19.04.2010	29.11.2018
149.	Mr. Muslim Khan	16.02.1970	Mardan	21.04.2008	21.04.2010	30.01.2018
150.	Mr. Muhammad Saddique	16.11.1968	Abbotabad	21.04.2008	21.04.2010	30.01.2018
151.	Mr. Faqir Hussain	02.02.1967	Peshawar	21.04.2008	21.04.2010	29.11.2018
152.	Mr. Naseer Khan	01.04.1963	Charsadda	21.04.2008	21.04.2010	15.11.2016
153.	Mr. Hukam Khan	14.03.1969	Charsadda	21.04.2008	21.04.2010	30.01.2018
154.	Mr. Arab Nawaz	11.02.1969	Charsadda	21.04.2008	21.04.2010	15.11.2016
155.	Mr. Mehar Ali	01.01.1969	Nowshera	21.04.2008	21.04.2010	30.01.2018
156.	Mr. Yar Nawab	05.11.1963	Mardan	21.04.2008	21.04.2010	30.01.2018
157.	Mr. Itikhar Ali	10.02.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018
158.	Mr. Nasir Khan	22.11.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018
159.	Mr. Hazrat Ullah	05.01.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018

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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
150.	Mr. Fazal Dad	16.03.1966	Charsadda	21.04.2008	21.04.2010	16.05.2019
151.	Mr. Abdullah Jan	24.10.1963	Peshawar	21.04.2008	21.04.2010	18.02.2022
152.	Mr. Liqat Ali	08.04.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018
153.	Mr. Tayyab Jan	01.05.1970	Charsadda	21.04.2008	21.04.2010	30.01.2018
154.	Mr. Asif Mehmood	25.04.1975	Bannu	04.07.2008	04.07.2010	18.02.2022
155.	Mr. Ghulam Saadiq	01.02.1968	Mkd. Agency	05.08.2008	05.08.2010	16.05.2019
156.	Mr. Roshan Zeb	16.02.1964	Mardan	26.08.2008	26.08.2010	30.01.2018
157.	Mr. Fazal Subhan	02.05.1968	Nowshera	26.08.2008	26.08.2010	30.01.2018
158.	Mr. Muhammad Ijaz Khan	01.09.1977	Charsadda	26.08.2008	26.08.2010	15.11.2016
159.	Mr. Muhammad Yaseen	30.03.1975	Charsadda	10.09.2008	10.09.2010	15.11.2016
170.	Mr. Ibrar Khan	20.05.1970	Abbottabad	19.09.2008	19.09.2010	15.11.2016
171.	Mr. Muhammad Yaseen	28.12.1973	Haripur	19.09.2008	19.09.2010	07.03.2017
172.	Mr. Ifikhar Ahmad	10.05.1968	Mansehra	19.09.2008	19.09.2010	14.03.2017
173.	Mr. Farhad Ali	16.11.1962	Mardan	19.09.2008	19.09.2010	16.05.2019
174.	Mr. Zakir Hussain	09.03.1966	Abbottabad	19.09.2008	19.09.2010	30.01.2018
175.	Mr. Azam Ali Shah	01.01.1963	Abbottabad	19.09.2008	19.09.2010	16.05.2019
176.	Mrs. Samina Zafar	25.12.1975	Haripur	19.09.2008	19.09.2010	07.03.2017
177.	Mr. Mehboob	16.12.1965	Abbottabad	19.09.2008	19.09.2010	07.03.2017
178.	Mr. Muhammad Hamayun	01.04.1963	Abbottabad	19.09.2008	19.09.2010	30.01.2018
179.	Mr. Ghulam Muhammad	01.11.1963	Mansehra	19.09.2008	19.09.2010	30.01.2018
180.	Mr. Zahoor-Ud-Din Khan	05.05.1963	D.I.Khan	03.12.2008	03.12.2010	15.11.2016
181.	Mr. Muhammad Nabi	09.10.1966	Charsadda	30.12.2008	30.12.2010	30.01.2018
182.	Mr. Ayaz Mehmood	20.02.1971	Mardan	30.12.2008	30.12.2010	30.01.2018
183.	Mr. Shakeel Ahmed	01.01.1974	Peshawar	29.01.2009	-	30.12.2019
184.	Mr. Hussain Ghulam	10.03.1970	Hangu	28.07.2009	28.07.2011	16.05.2019
185.	Mr. Muhammad Akbar	14.05.1963	Mardan	11.08.2009	11.08.2011	18.02.2022
186.	Mr. Zareef Khan	01.01.1969	Swabi	11.08.2009	11.08.2011	18.02.2022
187.	Mr. Bashir Dad	14.04.1972	Mardan	28.08.2009	28.08.2011	30.01.2018
188.	Mr. Arshad Hussain	15.05.1967	Shangla	28.08.2009	28.08.2011	16.05.2019
189.	Mr. Matloob Khan	13.04.1970	Haripur	28.08.2009	28.08.2011	24.08.2020
190.	Mr. Shah Nawaz	08.08.1965	Mansehra	28.08.2009	28.08.2011	30.09.2016
191.	Mr. Fazal Wahab	15.01.1965	Mardan	28.08.2009	28.08.2011	24.08.2020
192.	Mr. Jehanzeb Khan	30.11.1966	Abbottabad	28.08.2009	28.08.2011	24.08.2020
193.	Mr. Muhammad Amin	06.09.1962	Abbottabad	28.08.2009	28.08.2011	18.02.2022
194.	Mr. Muhammad Schail	30.04.1977	Mansehra	28.08.2009	28.08.2011	19.04.2022

Attached to be  
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 Adv. Zain  
 Kanwal

Checked by  
 Head Constable  
 10/10/2022

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
195.	Mr. Muhammad Yousaf	24.08.1964	Haripur	13.10.2009	13.10.2011	24.08.2020
196.	Mr. Muhammad Sajjad	24.03.1969	Mansehra	13.10.2009	13.10.2011	24.08.2020
197.	Mr. Fida Muhammad	11.12.1964	Abbottabad	13.10.2009	13.10.2011	24.08.2020
198.	Mr. Alam Zeb	10.11.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
199.	Mr. Saeed Khan	15.04.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
200.	Mr. Muhammad Ishag	21.12.1968	Nowshera	18.11.2009	18.11.2011	16.05.2019
201.	Mr. Pasham Gul	29.04.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
202.	Mr. Nasrullah Khan	20.04.1968	Peshawar	18.11.2009	18.11.2011	18.02.2022
203.	Mr. Janan Habib	16.05.1964	Charsadda	18.11.2009	18.11.2011	24.08.2020
204.	Mr. Amir Nawaz	20.03.1970	Charsadda	18.11.2009	18.11.2011	29.11.2018
205.	Mr. Afsar Zaman	01.09.1969	Mardan	18.11.2009	18.11.2011	29.11.2018
206.	Mr. Rajab Ali	09.02.1975	Kohat	18.11.2009	18.11.2011	24.08.2020
207.	Mr. Noor Ullah	10.05.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
208.	Mr. Mukhtiar Ahmad	03.12.1964	Charsadda	18.11.2009	18.11.2011	30.01.2018
209.	Mr. Muhammad Irfan	01.08.1970	Karak	12.07.1997	12.07.1999	16.05.2019
210.	Mr. Arshad Ahmed	06.01.1982	Nowshera	01.01.2010	01.01.2012	24.08.2020
211.	Mr. Muhammad Kamran	12.02.1981	Malakand	01.01.2010	01.01.2012	18.02.2022
212.	Mr. Sajid Mumtaz	27.12.1979	Charsadda	01.01.2010	01.01.2012	18.02.2022
213.	Mr. Fida Hussain	21.01.1983	Peshawar	01.01.2010	01.01.2012	18.02.2022
214.	Mr. Ijaz Ali	10.04.1983	Charsadda	01.01.2010	01.01.2012	18.02.2022
215.	Mr. Zaka Ullah	01.10.1965	Nowshera	01.01.2010	01.01.2012	18.02.2022
216.	Mr. Ali Khan	20.02.1968	Mkd Agency	01.01.2010	01.01.2012	24.08.2020
217.	Mr. Abdur Rashid	03.05.1968	Charsadda	01.01.2010	01.01.2012	29.11.2018
218.	Mr. Khalid Khan	02.01.1969	Nowshera	01.01.2010	01.01.2012	29.11.2018
219.	Mr. Niaz Muhammad	14.09.1973	Charsadda	01.01.2010	01.01.2012	29.11.2018
220.	Mr. Taj Muhammad Khan	13.02.1979	Nowshera	01.01.2010	01.01.2012	18.02.2022
221.	Mr. Tauheed Ullah	08.04.1982	Charsadda	01.01.2010	01.01.2012	29.11.2018
222.	Mr. Ijaz Ali	14.05.1978	Charsadda	01.01.2010	01.01.2012	18.02.2022
223.	Mr. Adnan Azam	16.06.1984	Charsadda	01.01.2010	01.01.2012	18.02.2022
224.	Mr. Zahid Alam	15.07.1987	Peshawar	01.01.2010	01.01.2012	18.02.2022
225.	Mr. Rehmatalah	07.03.1986	Peshawar	01.01.2010	01.01.2012	18.02.2022
226.	Mr. Muhammad Inam Jan	15.03.1979	Mardan	20.03.2010	20.03.2012	18.02.2022
227.	Mr. Luqman Khan	15.01.1980	Mardan	20.03.2010	20.03.2012	18.02.2022
228.	Mr. Ikhtiraz Khan	14.01.1985	Mardan	20.03.2010	20.03.2012	18.02.2022
229.	Pir Zar Badshah	25.05.1972	Mkd Agy	20.03.2010	20.03.2012	18.02.2022

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Sr. No.	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
230.	Mr. Muhammad Fazil	03.12.1978	Swabi	20.03.2010	20.03.2012	18.02.2022
231.	Mr. Imitiaz Ali	03.01.1977	Mardan	20.03.2010	20.03.2012	18.02.2022
232.	Mr. Sabir Gul	04.03.1984	Mardan	20.03.2010	20.03.2012	18.02.2022
233.	Mr. Azmat Ali	01.04.1978	Kohat	11.07.2010	11.07.2012	18.02.2022
234.	Mr. Sadat Khan	06.04.1983	Kohat	24.08.2010	24.08.2012	18.02.2022
235.	Mr. Fazal Hanif	01.01.1974	Karak	24.08.2010	24.08.2012	18.02.2022
236.	Mr. Nazar Hussain	10.01.1975	Hangu	24.08.2010	24.08.2012	18.02.2022
237.	Mr. Muhammad Yousaf	10.04.1975	Karak	24.08.2010	24.08.2012	18.02.2022
238.	Mr. Nazir Khan	02.04.1977	Kohat	24.08.2010	24.08.2012	18.02.2022
239.	Mr. Abid Khan	01.03.1979	Kohat	24.08.2010	24.08.2012	18.02.2022
240.	Mr. Umar Hayat	01.02.1984	Karak	24.08.2010	24.08.2012	18.02.2022

(DR.  FSP

AIG/Establishment

For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar

ndst: No. & date even.

opy to all concerned

Alleged to be done  
copy, Adv. Gen.  
Kareem

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OFFICE  
COMMANDANT  
FRONTIER RESERVE POLICE  
KHYBER PAKHTUNKHWA PESHAWAR  
Email: commandantfrp@paf.gov.pk  
Ph. No. 091-9211111 Fax No. 091-9211111

No. 6473 /EC, dated Peshawar the 15/08/2022

To: - The Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

Subject: - RESTORATION OF SENIORITY

Memo: Kindly refer to the FRP DI Khan Range Letter No. 1428/FRP, dated  
12.08.2022.

It is submitted that SP FRP DI Khan Range Mr. Nisar Muhammad Khan DSP, has forwarded an application requesting therein for correction in his Seniority on list "E" is forwarded herewith for further process, please.

COMMANDANT,  
Frontier Reserve Police,  
Khyber Pakhtunkhwa  
Peshawar.

BU  
15/8/22

Attested to be  
true copy  
Adv. Far  
Khan





27

OFFICE OF THE  
SUPERINTENDENT OF POLICE  
FRP, DIKHAN RANGE, DIKHAN.

Ph: No. 0966-9280141  
Fax No. 0966-9280142

No. 1428 /FRP, dated DIKhan the 12 /08/2022


To :- The Commandant,  
FRP, Khyber Pakhtunkhwa, Peshawar.

Subject:- RESTORATION OF SENIORITY.

Memo:-

Kindly refer to the case noted above in the subject.

It is submitted that a re-presentation in respect of undersigned for restoration of Seniority is enclosed herewith for onward submission to CPO Peshawar, please.

  
(NISAR MOHAMMAD KHAN)  
Superintendent of Police,  
FRP, DIKhan Range, DIKhan.

Attested to be  
true copy.  
Adu Zain  
Kamran

To :- The Worthy Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

Through: Proper Channel.

Subject:- RESTORATION OF SENIORITY.

Memo:-

Most humbly requested that the applicant is serving as Deputy Superintendent of Police (BS-17) under your kind control and currently posted as Superintendent of Police in FRP Police DIKhan. The applicant was inducted in Police Departmental as PASI on 09.01.1995 in Bannu Region and the applicant was brought on Serial No.32 in the merit order issued vide Secretary Public Service Commission, NWFP, Peshawar Memo: No.5427/EXAM dated 22.11.1994 (copy enclosed).

- a. That after completion of successful probation period the applicant was confirmed as ASI from the date of appointment vide Regional Police Officer Bannu Region order Endst: No.3161-62/ES dated 30.12.1998.
- b. That the applicant was bought on List "E" on 13.07.2001 vide Regional Police Officer Bannu Region order No.1891-94/ES dated 20.07.2001 instead of from the date of confirmation i.e 30.12.1998 as ASI.
- c. That due to non-bringing of my name on List "E" from the date of confirmation as ASI, the applicant became most junior between my Provincial batchmates and suffering by this clerical mistake which causing great loss to the applicant.
- d. That in this regard the applicant preferred many re-presentations before Worthy Regional Police Officer Bannu Region for re-visiting and re-fixation of seniority of the applicant with due date and right place in the seniority list i.e "E" List, but no response has been received from the said gracious office so far.

It is further added that in the seniority list of DSsP issued vide CPO Khyber Pakhtunkhwa Peshawar No.352/SE-I dated 21.02.2022, the applicant name was shown at Serial No.61 and in the Final Seniority List issued vide No.1594/SE-I dated 05.08.2022, the applicant name is shown at Serial No.83.

It is therefore requested that in this regard, necessary corrigendum may kindly be issued and the applicant may kindly be brought on right place in the seniority List of DSsP on sympathetic grounds, please.

I shall remain thankful and obliged.

Dated :-

Regards

(Nisar Muhammad Khan DSP)  
Presently posted as Superintendent of Police,  
FRP, DIKhan Range, DIKhan.

*Attached to be final copy.  
Advisor  
Kamran*

*Mailed to be  
true copy  
Adv. to  
Karnal*

BEFORE THE KHYBER PAKH  
TRIBUNAL, PESH

in Amended service Appeal No.991/2018

Abdul Hai Khan Deputy Superintendent of Police  
Presently Posted As Assistant (Crime), -Anti Corruption  
Establishment at D.I.Khan

(Appellant)

**VERSUS**

1. Government of KPIC, through Home Secretary, KPIC Peshawar.
2. The Secretary to the Govt; of Khyber Pakhtunkhwa, Home of Tribal Affairs Department, Peshawar.
3. The Provincial Police Officer, Central Police Officer, Peshawar.
4. The Addl; Inspector General Of Police, Head Quarters, CPO, Peshawar.
5. Mr. Tauheed Khan, DSP C/O Central Police Office, Peshawar.
6. Mr. Salah ud din, DSP C/O Central Police Office, Peshawar.
7. Mr. Tariq Habib, DSP C/O Central Police Office, Peshawar.
8. Mr. Nisar Ahmad, DSP C/O Central Police Office, Peshawar.
9. Mr. Aslam Nawaz, DSP C/O Central Police Office, Peshawar.

- 11. Mr. Sana ullah, DSP C/O Central Police Office, Peshawar.
- 12. Mr. Shafi ullah, DSP C/O Central Police Office, Peshawar.
- 13. Mr. Qamar Hayat, DSP C/O Central Police Office, Peshawar.
- 14. Mr. Nazir Ahmad, DSP C/O Central Police Office, Peshawar.
- 15. Mr. Saeed Akhtar, DSP C/O Central Police Office, Peshawar.
- 16. Mr. Muhammad Ayaz, DSP C/O Central Police Office, Peshawar.
- 17. Mr. Muhammad JAMIL, DSP C/O Central Police Office, Peshawar.
- 18. Mr. Ishtiaq Ahmad, DSP C/O Central Police Office, Peshawar.
- 19. Mr. Shoukat Ali, DSP C/O Central Police Office, Peshawar.
- 20. Mr. Abdul Samad, DSP C/O Central Police Office, Peshawar.
- 21. Mr. Mushtaq Ahmad, DSP C/O Central Police Office, Peshawar.
- 22. Mr. Sajjad Ahmad, DSP C/O Central Police Office, Peshawar.
- 23. Mr. Tahir Iqbal, DSP C/O Central Police Office, Peshawar.
- 24. Mr. Muzamil Shah, DSP C/O Central Police Office, Peshawar.
- 25. Mr. Niaz Muhammad, DSP C/O Central Police Office, Peshawar.
- 26. Mr. Shah Hassan, DSP C/O Central Police Office, Peshawar.

27. Mr. Sajjad Ahmad Sahibzada, DSP C/O Central Police Office, Peshawar.

28. Mr. Nazeer Ahmad, DSP C/O Central Police Office, Peshawar.

(RESPONDENTS)

APPEAL UNDER SECTION 41 OF THE KPK SERVICES TRIBUNAL ACT, 1974, AGAINST FINAL SENIORITY LIST ISSUED VIDE NOTIFICATION OFFICE ENDST NO 307/SE-I DATED 22/03/2018 BESIDES OMISSION ON PART OF RESPONDENT NO 3 AND 4 FOR INDECISION OF DEPARTMENTAL REPRESENTATION DATED 19/04/2018 FORWARDED THROUGH PROPER CHANNEL TO COMPETENT AUTHORITY.

Respectfully Sheweth;

1. That the appellant is serving as Deputy Superintendent of Police (BS-17) and currently posted as Assistant Director (Crimes) in Anti-Corruption Establishment at Dera Ismail Khan.
2. That the appellant was appointed as Assistant Sub-Inspector (BS-9) in KPK Police Department on the recommendation of KPK Public Service Commission on 01/02/1995 and was placed at top of the meri list at Serjamosi. Copy of the order is annexed as Annexure-A.
3. That a departmental final seniority list has been prepared vide office Endst; no 307/SE-I dated 22/03/2018 wherein the

Mr. Nazir Khan and above the name of Mr. Mohammad Tahir while the officers junior to the appellant have been placed at serial No#30 and below in the list Ibid and all of them were placed below in merit which for all intent is erroneous and wrongly placed. Copy of Seniority List is attached as Annexure-B.

4. That to the dismay of the appellant his position has been disturbed by the dnt. of Seniority List effective 22/03/2018 issued over notification Ibid, depriving the appellant wrongly of his Seniority position by placing him at serial No#67 much below to his junior while the initial merit of Public Service Commission ensures without change in subsequent events concerning Seniority of batch-wise contemporaries.
5. That the appellant is to be placed at serial No#30 of the said Seniority List in place of Mr. Tauheed in light of the relevant rules where by Seniority is reckoned in accordance with the placement of successful candidates inducted through Provincial Public Service Commission, Peshawar.
6. That in view of the Rule 17 sub rule 1 (a) of the KP Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 'The Seniority inter se of civil servants shall be determined in case of persons appointed by Initial recruitment, in accordance with the order of merit assigned by the Commission.
7. That also according to the Rule 2 (2) of the Civil Servant (Seniority) Rules, 1993, "if two or more persons are recommended in open advertisement by the Selection Authority their inter-se sonority shall be determined in order of merit assigned by the selection authority".
8. That the Seniority List for the year 2018 is apparently based

reckoning of seniority in the Impugned list is that even those inducted in service much later than the petitioner i.e M/S Nazir Ahmad, Saeed Akhtar, Muhammad Ayaz and Muhammad Jamil are placed at serial no 48 to 51 and thus much above the appellant though all of them are juniors to the appellant.

That as per Rule 17 (2) of the KPK Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 "Seniority in the various cadres of the civil servants appointed by initial recruitment vis-a vis those appointed otherwise shall be determined with reference to their dated of their regular appointment to a post in that cadre".

10. That according to section 8(4) of KPK Civil Servant Act, 1973 "Seniority in a post, service or cadre to which a civil servant is promoted shall take effect from date of regular (initial) appointment".

11. That the appellant is entitled for equal treatment as per Article 25 of the Constitution of Islamic Republic of Pakistan and his Seniority may be considered from the merit list of the Public Service Commission Peshawar as per dictum laid down by the superior courts.

12. That the appellant being aggrieved of the Impugned Final Seniority preferred a Departmental Appeal/ Representation to Respondent no 3, on 19/04/2018, forwarded through proper channel to competent authority to entertain the same. Copy attached at Annexure-C.

13. That the appellate authority has not decided representation of the appellant regarding grievances as yet hence the appellant being aggrieved person has a right and cause of action to file instant appeal before this Honorable Service Tribunal Inter



GROUND S

1. That the Appellant has not been provided equal treatment when there is no express inhibition against him under the law and has also not been given equal protection of law, which is discriminatory instance of arbitrariness and is against the principles contained in Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
2. That the appellant has been subjected to injustice and the case of Appellant has not been dealt under the principle of the fair play.
3. That the impugned notification of the Respondents no 3 and also the procedure adopted is wrong in the exercise of jurisdiction is in exercise of jurisdiction and misapplication of clear rules.
4. That the impugned seniority list is against the settled laws and rules of Seniority In service and no legal footings hence ineffective upon the rights of appellant.
5. That the impugned seniority list is in violation of rules and statutory provisions as well as the dicta of superior courts pronounced in a number of judgments, hence the same needs to be corrected.
6. That this Honourable Tribunal is competent and has ample powers to adjudge the matter under Appeal.
7. That with the kind permission of this worthy Tribunal, amended service appeal is being filed today after arraying private respondents as party.
8. That counsel for the appellant may kindly be allowed to raise additional grounds at the time of arguments.

It is, therefore, humbly requested that on gracious




aside/nullified and the appellant may be declared and placed at serial#30 i.e. above Mr. Tauheed Khan in accordance with seniority Rules as envisaged in Estta codes and Civil Service Regulation.

Dated, 33/04/2019

Your humble appellant:

Abdul Hai Khan

Through counsel

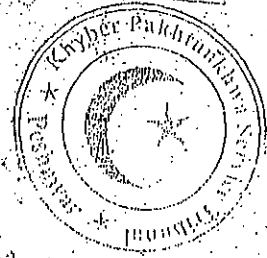
  
Muhammad Abdullah Baloch  
Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.991/2018

Date of Institution: 10.08.2018

Date of Decision: 17.12.2020



Abdul Hai Khan Deputy Superintendent of Police, Presently posted as Assistant Director (Crime), Anti corruption Establishment at D.I. Khan.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Home Secretary and 27 others.

(Respondents)

Muhammad Abdullah Baloch  
Advocate.

For Appellant

Mr. Muhammad Jan  
Deputy District Attorney

For Official Respondents

Mrs. ROZINA REHMAN  
Mr. ATIQ UR REHMAN WAZIR

MEMBER (ATTENDED)  
MEMBER (E)

*[Signature]*  
Khyber  
Service

JUDGMENT: -

Mr. ATIQ UR REHMAN WAZIR: - Appellant Mr. Abdul Hai Khan, was initially appointed as Assistant Sub Inspector (BPS-9) in Provincial Police on the recommendations of Khyber Pakhtunkhwa Public Service Commission on 01.02.1995 and was placed at top of the merit list; that in due course of time, the appellant was promoted to the post of DSP; that departmental final seniority list of DSPs was issued on 22.03.2018; wherein the appellant was placed much junior to his colleagues, who all were junior to him in the initial seniority list assigned by Public Service Commission; that he is also placed junior to those inducted in service much later than the appellant. The appellant filed

departmental appeal on 19.04.2018, but of no avail, hence the instant appeal with prayers that seniority list dated 22.03.2018 may be set aside and seniority of the appellant may be placed at Serial No. 30 i.e. above Mr. Tauheed Khan in accordance with seniority rules as envisaged in Estab Code and Civil Service Regulations.

2. Written reply/comments were submitted by respondents.

3. Arguments heard and record perused.

4. Learned counsel for the appellant contended that the appellant was initially appointed as ASI on 01.02.1995 on the recommendations of Khyber Pakhtunkhwa Public Service Commission and was placed at the top of the seniority list. Learned counsel for the appellant further contended that during the course, the appellant was promoted to the rank of DSP and as per impugned final seniority list issued on 22.03.2018, the appellant is placed at Serial No. 67 below the name of Mr. Nazir Khan and above Mr. Muhammad Tahir, while the officers junior to him have been placed at Serial No. 30, which for all intent and purposes is erroneous and wrongly placed. The learned counsel for the appellant argued that in view of Rule 17 (1) (a) of the Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the seniority inter se of civil servants shall be determined in case of persons appointed by initial recruitment, in accordance with merit assigned by Commission. Learned counsel for the appellant contended that the impugned seniority list is based on error and an outcome of improper reckoning due to misreading of record to the effect that those inducted in service much later than the appellant i.e. Nazir Ahmad, Saeed Akhtar, Muhammad Ayaz and Muhammad Jamil are placed at Serial No. 48 to 51 of the said list much above the appellant. He further added that as per Rule 17 (2) of Khyber

ATTESTED

Signature  
for Public Service Commission  
Khyber Pakhtunkhwa

Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules, 1989, seniority in various cadres of the civil servants appointed by Initial recruitment vis-à-vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre. Section 8 (4) of the Civil Servants Act, 1973 also provides that seniority in a post, service or cadre to which a civil servant is promoted shall take effect from the date of regular (initial) appointment. Learned counsel for the appellant argued that the appellant is entitled for equal treatment as per article 25 of the Constitution and his seniority need to be considered from the merit list of the Public Service Commission. Learned counsel for the appellant referred to the judgments of this Tribunal in Service Appeal No. 79/2019, Service Appeal No. 736/2016, Service Appeal No. 162/2014 and Service Appeal No. 1227/2013, where in similar nature cases, relief has already been granted by this tribunal. Learned counsel for the appellant also referred to the judgments of Supreme Court of Pakistan in 2016 SCMR 1254 and 2002 PLC (CS) 1388. On question of limitation the learned counsel referred to the judgment of supreme court of Pakistan in 2002 PLC (CS) 1388 and 2009 PLC (CS) 178, where on the issue of promotion, pay and other emoluments, limitation would not foreclose his right accrued to him. Learned counsel for the appellant prayed that in view of the situation, the impugned seniority list dated 22.03.2018 may be set aside and the respondents may be directed to place the name of the appellant at Serial No. 30 above Mr. Tauheed Khan in accordance with seniority rules to meet the end of justice with all consequential benefits of service.

The learned Deputy District Attorney appeared on behalf of official

respondents stated at bar that seniority issue of the appellant was discussed in

meeting of a committee constituted for the purpose on 29.11.2018 and it was

ATTESTED  
KAD5  
DEPUTY DISTRICT ATTORNEY

observed that the appellant was confirmed as Sub Inspector on 19.05.2006 and his name was brought on list F on 20.12.2006, whereas his juniors were confirmed as SI on 07.04.2003 and brought their names on list F earlier to the appellant i.e. 16-12-2005. The committee noted that his seniority was disturbed due to late confirmation in the rank of sub inspector. Since the list of promotion/confirmation of officers in the rank of ASIs and SIs are dealt with in the regions, therefore the committee recommended that his case may be sent to Regional Police Officer (RPO) D.I. Khan to revisit his seniority in the light of rules and facts mentioned in his application. Accordingly, his case was examined at the level of RPO D.I. Khan and it was observed that appellant was at Serial No. 1 of the seniority list after his induction in service as ASI on 01.02.1995, but his name was placed at Serial No. 4 instead of Serial No. 1 without any reason mentioned in the confirmation order and their names were brought on list E w.e.f. 25.04.1998 in which the name of Mr. Tauheed Khan at Serial No. 8 was placed on top of the list. Learned Deputy District Attorney contended that the RPO office was not sure as to why his name was brought to Serial No. 4 instead of Serial No. 1, as there was no adverse action taken against the appellant nor any other reason assigned. One of the probable reasons mentioned was that it might be due to age.

ATTESTED

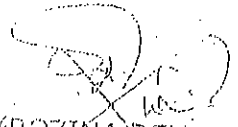
Khyber P. Service Tribunal, Peshawar

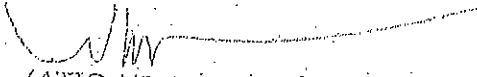
6. We are conscious of the fact that time limitation needs to be kept in mind, but in the light of judgments of Supreme Court of Pakistan referred to above and in view of provisions of S-23 of Limitation Act 1908, the appellant has a continuous cause of action and issuance of seniority list at belated stage by respondents created a fresh cause of action for the appellant, not knowing the fact that his late confirmation in 2006 would entail seniority issue at a later stage. In order to ascertain the actual situation, representative of RPO D.I. Khan


was summoned by Court; who stated at bar that there was nothing adverse against the appellant during the time, but the change in seniority might be due to clerical mistake, which travelled along the seniority of the appellant and culminated into the final seniority list issued in 2018. We also did not find anything adverse on record except his late confirmation due to unknown reasons. It is also established from the prevailing rules that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post. Moreover this tribunal as well as Supreme Court of Pakistan in number of Judgments have granted relief in similar cases.

7. In the light of facts and circumstances of the present case, the impugned seniority list dated 22-03-2018 is set aside and the instant appeal is accepted as prayed for. No orders as to costs. File be consigned to the record room.

ANNOUNCED  
17.12.2020

  
(ROZINA REHMAN)  
MEMBER (J)

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

Certified by the pure copy  
  
Encl. 1  
Hyder Rakhankhwa  
Service Tribunal  
Pakistan

Date of Presentation of Application 17/12/2020  
Number of Pages 2000  
Copies 2000  
Pages 6  
Total 2000  
Place of \_\_\_\_\_  
Date of Completion of Copy 23/12/2020  
Date of Issuance of Copy 23/12/2020

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Annexure "I"



OFFICE OF THE  
REGIONAL POLICE OFFICER,  
DERA ISMAIL KHAN REGION

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

No. \_\_\_\_\_ /ES dated D.I.Khan the 30 /05/2022  
ORDER

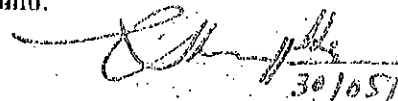
In compliance with the execution Judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020 in Service Appeal No.991/2018, titled Abdul Hai Khan, Deputy Superintendent of Police Vs. Govt. of Khyber Pakhtunkhwa, through Home Secretary and 27 others, & direction of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPB/421 dated 16.11.2021, this office Order No.315-17/ES dated 09.03.1998 ((wherein name of the petitioner Abdul Hai DSP was relegated to serial no. 4 from serial no. 1 in violation of this office Order No.236-38/ES dated 01.02.1995 (order of his initial appointment) while confirming him in his substantive rank of Assistant Sub-Inspector (ASI)) & Notification No.622/ES dated 25.04.1998 ((wherein name of the petitioner Abdul Hai DSP was further relegated to serial no. 7 from serial no. 4 in violation of this office Order No.236-38/ES dated 01.02.1995 (order of his initial appointment) while placing his name on the Promotion List E)), are hereby withdrawn.

(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan

No. 3448-55 /ES,

Copies to:-

1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for favour of information w.r.t letter No. quoted above, please.
2. The Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar.
3. Mr. Abdul Hai Khan, DSP, Assistant Director, Anti-Corruption Establishment DI Khan
4. Mr. Syed Inayat Ali Amjad, DSP, Acting SP Investigation, Kohat
5. Mr. Zia Hassan, DSP, Acting SP Investigation, Bannu
6. Mr. Salah ud Din, DSP, SP Security, CCP Peshawar
7. Mr. Shafi Ullah, DSP, Acting DPO Karak.
8. Mr. Tauheed Khan, DSP, Acting SP Special Branch, South at Bannu.

  
(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan  
30/05/2022

Alleged to be  
True Copy  
Adv. Zor  
Kamran



OFFICE OF THE  
REGIONAL POLICE OFFICER,  
DERA ISMAIL KHAN REGION

42

☎ 0966-9280291 Fax: ☎ 9280290  
✉ estt.ro.dik@gmail.com

No. 3456 /ES

dated D.I. Khan the


20/05/2022

**ORDER**

In compliance with the execution Judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020 in Service Appeal No.991/2018, titled Abdul Hai Khan, Deputy Superintendent of Police Vs. Govt. of Khyber Pakhtunkhwa, through Home Secretary and 27 others, & direction of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. GPO/CPB/421 dated 16.11.2021, this office Order No.315-17/ES dated 09.03.1998 and in continuation with this office Order No. 3448-55/ES, dated 30.05.2022, and in supersession of this Order No.315-17/ES dated 09.03.1998 (wherein name of the petitioner Abdul Hai DSP was relegated to serial no. 4 from serial no. 01 in violation of this office Order No.236-38/ES dated 01.02.1995 (order of his initial appointment) while confirming him in his substantive rank of Assistant Sub-Inspector (ASI)), his *inter se seniority* viz a viz his batchmates is hereby restored to its original order as provided in the order of their initial appointment vide this office Order No.236-38/ES dated 01.02.1995 in the manner provided in the following table:

Table: Table showing *inter se seniority* of ASIs appointed by way of initial appointment vide office Order No.236-38/ES dated 01.02.1995.

1	2	3	4
S.No	Name & Address	Rank No. Allotted	Dist. To which posted
1	Abdul Hai Khan S/O Ahmad Saeed Khan, R/O Village Chuhdwan, Distt. DI Khan	27/D	DI Khan
2	Syed Inayat Ali Amjad S/O Syed Mirad Ali Shah, R/O Village Thathal, P.O. Mandoran, Kalan, Chashma Road Distt. DI Khan	28/D	DI Khan
3	Kalim Ullah S/O Hafiz Bashir Ahmad, R/O Haji Wora, DI Khan	37/D	DI Khan
4	Zia Hassan S/O Gul Hassan, Village Khaina Khel, DI Khan	45/D	Tank
5	Salah-ud-Din Ayub S/O Rehmatullah Village & P.O. Darrahi, Tehsil & District Tank	46/D	Tank
6	Shafiqullah Khan S/O Amanullah Khan Village & P.O. Maddal, Tehsil Kalachi, District DI Khan	47/D	Tank
7	Mohammad Nadeem Siddiqi S/O Ghulam Yaseen, Siddiqi House Faqir Abad Bichhid Commerce College DI Khan	48/D	DI Khan
8	Tauhid Khan S/O Abdul Hamid Khan, Village Kiri Malang, District DI Khan	49/D	DI Khan

  
30/05/22  
(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan

No. /ES,

Copies to:-

1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for Invoir of information w.r.t letter No. quoted above, please.
2. The Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar.
3. Mr. Abdul Hai Khan, DSP, Assistant Director, Anti-Corruption Establishment DI Khan
4. Mr. Syed Inayat Ali Amjad, DSP, Acting SP Investigation, Kohat
5. Mr. Zia Hassan, DSP, Acting SP Investigation, Bannu
6. Mr. Salah ud Din, DSP, SP Security, CCP Peshawar
7. Mr. Shafi Ullah, DSP, Acting DPO Karak
8. Mr. Tauheed Khan, DSP, Acting SP Special Branch, South at Bannu.

(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan



43



OFFICE OF THE  
REGIONAL POLICE OFFICER,  
DERA ISMAIL KHAN REGION

0966-9280291 Fax # 9280290  
est.dia.dlk@gmail.com

No. /ES  
**ORDER**

dated D.I.Khan the

20/05/2022

In compliance with the execution Judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020 in Service Appeal No.991/2018, titled Abdul Hai Khan, Deputy Superintendent of Police Vs. Govt. of Khyber Pakhtunkhwa, through Home Secretary and 27 others, &c direction of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPB/421 dated 16.11.2021, this office Order No.315-17/ES dated 09.03.1998 and in continuation with this office Order No. 3448-55/ES, dated 30.05.2022, and in supersession of this Order No.315-17/ES dated 09.03.1998 ((wherein name of the petitioner Abdul Hai DSP was relegated to serial no. 4 from serial no. 01 in violation of this office Order No.236-38/ES dated 01.02.1995 (order of his initial appointment) while confirming him in his substantive rank of Assistant Sub-Inspector (ASI)), his *inter se seniority* viz a viz his batchmates is hereby restored to its original order as provided in the order of their initial appointment vide this office Order No.236-38/ES dated 01.02.1995 in the manner provided in the following table:

Table: Table showing *inter se seniority* of ASIs appointed by way of initial appointment vide office Order No.236-38/ES dated 01.02.1995.

1	2	3	4
S/No	Name & Address	Range No. Allotted	Dist. To which posted
1	Abdul Hai Khan S/O Ahmad Saeed Khan, R/O Village Chuhidwan, Distt. DI Khan	27/D	DI Khan
2	Syed Inayat Ali Amjad S/O Syed Murad Ali Shah, R/O Village Thathal, P.O Mandarun Kohat, Chitashan Road Distt. DI Khan	28/D	DI Khan
3	Kalim Ullah S/O Hafiz Bashir Ahmad, P.O Haji Morah DI Khan	37/D	DI Khan
4	Zia Hassan S/O Gul Hassan, YH Age Khaini, Khel, DI Khan	45/D	Tank
5	Sulab-ud-Din Ayub S/O Rehmanullah Village & P.O. Darraiki, Tehsil Kutchi, District DI Khan	46/D	Tank
6	Shahinullah Khan S/O Anwarullah Khan Village & P.O Mandal, Tehsil Kutchi, District DI Khan	47/D	Tank
7	Mohammad Nadeem Siddiqi S.O Ghulam Yaseen, Siddiqi House Faqir Abad Behind Commerce College DI Khan	48/D	DI Khan
8	Tauheed Khan S/O Abdul Hamid Khan, Village Kirri Mulang, District DI Khan	49/D	DI Khan

(SHAIKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan

No. 3457-64/ES,  
Copies to:-

1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for favour of information w.r.t letter-No. quoted above, please.
2. The Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar.
3. Mr. Abdul Hai Khan, DSP, Assistant Director, Anti-Corruption Establishment DI Khan
4. Mr. Syed Inayat Ali Amjad, DSP, Acting SP Investigation, Kohat
5. Mr. Zia Hassan, DSP, Acting SP Investigation, Bannu
6. Mr. Salah ud Din, DSP, SP Security, CC) Peshawar
7. Mr. Shafi Ullah, DSP, Acting DPO Karak.
8. Mr. Tauheed Khan, DSP, Acting SP Special Branch, South at Bannu.

*(Signature)*  
(SHAIKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan

Attached to be have  
Copy. Adv. Exp  
Kanu/22



44

OFFICE OF THE  
REGIONAL POLICE OFFICER,  
DERA ISMAIL KHAN REGION  
0966-9280291 Fax # 9280290  
sst.ro.dik@pmail.com

No. /ES  
Q.R.D.E.R (REVISION OF THE PROMOTION LIST "E" AS IT STOOD ON 31.12.1998) dated D.J. Khan the

30/05/2022

In compliance with the execution judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020 in Service Appeal No.991/2018, titled Abdul Hai Khan, Deputy Superintendent of Police Vs. Govt. of Khyber Pakhtunkhwa, through Home Secretary and 27 others, & directions of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPB/M21 dated 16.11.2021, & in supersession of all previous orders issued by this office, from time to time, with regard to the dates of bringing names of the petitioner and respondents of the said Service Appeal No.991/2018 on the Promotion List I, severally and collectively, and in the exercise of powers conferred on me by PR. 13.11 of the Police Rules, 1934, read with the Promotion Policy, provided in the Establishment Code Khyber Pakhtunkhwa (ESTA CODE) (Revised Edition) 2011, and in the continuation of this office order Nos. 3448-55/ES dated 30.05.2022, 3497-64/ES dated 0.05.2022, 3466-75/ES dated 30.05.2022 and 3477-86/ES dated 30.05.2022; the Promotion List I: as it stood after 30.05.2022, is hereby revised in the manner provided in the table below to the extent of police officers at serial No. 34 to 41 only.

Table: Table showing revised seniority on Promotion List E as it stood before and after 30.05.2022

1	2	3	4	5	6
Serial No.	Order of Seniority on the Promotion List E, as it stood before 30.05.2022	Revised Order of Seniority as it stood after 30.05.2022	Name & Address	Previous Dates of Admission into the Promotion List E	Revised Dates of Admission into the Promotion List E
1	1	1	SI Shafi Ullah, 1/D		
2	2	2	SI Abdul Jabbar 16/D	01.01.1981	01.01.1981
3	3	3	SI Zar Wali 17/D	01.06.1990	01.06.1990
4	4	4	SI Ghulam Yaseen 36/D	01.06.1990	01.06.1990
5	5	5	SI Atta Muhammad 22/D	01.10.1991	01.10.1991
6	6	6	SI Saad Shah 29/D	01.10.1991	01.10.1991
7	7	7	SI Ghulam Akbar Shah 24/D	01.10.1991	01.10.1991
8	8	8	SI Noor Ghulam 25/D	01.04.1992	01.04.1992
9	9	9	SI Nasrullah 26/D	01.04.1992	01.04.1992
10	10	10	SI Ahmad Gul 30/D	01.04.1992	01.04.1992
11	11	11	SI Ghulam Qasim 31/D	01.04.1992	01.04.1992
12	12	12	SI Gul Nawaz 32/D	01.04.1992	01.04.1992
13	13	13	SI Sultan Ahmad 33/D	01.04.1992	01.04.1992
14	14	14	SI Fatah Sher 34/D	01.04.1992	01.04.1992
15	15	15	SI Allah Noor 35/D	01.04.1992	01.04.1992
16	16	16	SI Hamid Ullah 5/D	22.12.1992	22.12.1992
17	17	17	SI Habib Ali 39/D	22.12.1992	22.12.1992
18	18	18	SI Abdul Hayee 40/D	25.07.1994	25.07.1994
19	19	19	SI Shazada Kaubab Farooq 41/D	25.07.1994	25.07.1994
20	20	20	SI Abdul Ghaffoor 43/D	25.07.1994	25.07.1994
21	21	21	SI Arbab Khan 44/D	25.07.1994	25.07.1994
22	22	22	SI Karim Khan 23/D	15.08.1994	15.08.1994
23	23	23	ASI Iqbal Nawaz 4/D	07.08.1995	07.08.1995
24	24	24	ASI Muhammad Ayub 2/D	07.08.1995	07.08.1995
25	25	25	ASI Imdad Hussain 3/D	07.08.1995	07.08.1995
26	26	26	ASI Habib Hussain 9/D	07.08.1995	07.08.1995
27	27	27	ASI Noor Muhammad 20/D	18.02.1996	18.02.1996
28	28	28	ASI Fiaz Ali 50/D	12.03.1996	12.03.1996
29	29	29	ASI Gul Sher 6/D	21.08.1996	21.08.1996
30	30	30	ASI Ghulam Abbas 7/D	09.09.1997	09.09.1997
31	31	31	ASI Muhammad Saeed 19/D	09.09.1997	09.09.1997
32	32	32	ASI Iqbal Ullah 21/D	09.09.1997	09.09.1997
33	33	33	SI Hussain Bakht 12/D	09.09.1997	09.09.1997
34	40	34	ASI Abdul Hai Khan, No. 27/D	02.12.1997	02.12.1997
35	39	35	ASI Syed Inayat Ali Anjad, No. 28/D	25.04.1998	02.02.1998
36	35	36	ASI K. Jim Ullah, No. 37/D	25.04.1998	02.02.1998
37	41	37	ASI Zia Hussain, No. 45/D	25.04.1998	02.02.1998
38	36	38	Salah-ud-Din Ayub, No. 46/D	25.04.1998	02.02.1998
39	37	39	ASI Shafiqullah Khan, No. 47/D	25.04.1998	02.02.1998
40	38	40	ASI Mohammad Nadeem Siddiqui, No. 48/D	25.04.1998	02.02.1998
41	34	41	ASI Tauhid Khan, No. 49/D	25.04.1998	02.02.1998
42	42	42	ASI Muhammad Hussain 38/D	02.09.1998	02.02.1998

No. 3488-96 /ES,

Copies to:-

- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for forwar of information w.r.t letter No. quoted above, please.
- The Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar, w.r.t letter No. 1138/ST dated 28.12.2020, please.
- The District Police Officers, DI Khan & Tank.
- Mr. Abdul Hai Khan, DSP, Assistant Director, Anti-Corruption Establishment DI Khan
- Mr. Syed Inayat Ali Anjad, DSP, Acting SP Investigation, Kohat
- Mr. Zia Hussain, DSP, Acting SP Investigation, Damm
- Mr. Salah ud Din, DSP, SP Security, CCP Peshawar
- Mr. Shafi Ullah, DSP, Acting DPO Karak.
- Mr. Tauheed Khan, DSP, Acting SP Special Branch, South at Bannet

(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan

Attached to be  
have copy -  
Adv. Far  
Kansal P

(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan



45

OFFICE OF THE  
REGIONAL POLICE OFFICER,  
DERA ISMAIL KHAN REGION  
☎ 0966-9780291 Fax: 0230290  
✉ d.ikr.p.o@mail.com

No. /ES  
**ORDER**

dated D.I. Khan the

30/05/2022

In compliance with the execution Judgment of the Honorable Service Tribunal, Peshawar, dated 17.12.2020, in Service Appeal No.991/2018, titled **Abdul Hai Khan, Deputy Superintendent of Police Vs. Govt. of Khyber Pakhtunkhwa**, through Home Secretary and 27 others, & direction of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPB/421 dated 16.11.2021 and in continuation with this office Order No. 3448-55/ES, dated 30.05.2022, and Order No. 3457-64/ES dated 30.05.2022 and this office Order No. 3456-73/ES dated 30.05.2022 & in the supersession of this order of bringing their names on the Promotion List E, issued vide this office Notification No.622/ES, dated 25.04.1998, the date of bringing his name, along with that of his batchmates, on the Promotion List E, is hereby revised in the light of PR. 13.11 and 19.25(S), and judgement of the Honourable Supreme Court of Pakistan in case titled **Gul Hassan Jatui and others Vs Faqir Muhammad Jatui and others**, reported in 2016 SCMR 1254, in the manner provided in the following table:

Table: Table showing inter se seniority of ASIs appointed by way of initial appointment vide office Order No.336-38/ES dated 01.02.1995 on the Promotion List E.

1	2	3	4	5	6
Sl. No.	Name & Address	Range No. Allotted	Distt. To which posted	Previous Date of bringing their names on the Promotion List E	Revised Date of bringing their names on the Promotion List E
1	Abdul Hai Khan S/O Ahm. J. Saeed Khan, R/O Village Chahdwan, Distt. DI Khan	27/D	DI Khan	25.04.1998	02.02.1998
2	Syed Inayat Ali Amjad S/O Syed Murad Ali Shah, R/O Village Thathal, P.O. Mundhran Kuln, Chashma Road Distt. DI Khan	28/D	DI Khan	25.04.1998	02.02.1998
3	Rafiq Ullah S/O Hafiz. Baqir Ahmad, P.O. Haji Mohd DI Khan	37/D	DI Khan	25.04.1998	02.02.1998
4	Zia Hassan S/O Gul Hassan Village Khairu Khel, DI Khan	45/D	Tank	25.04.1998	02.02.1998
5	Salah-ud-Din Ayub S/O Rahmatullah Village & P.O. Dargah, Tehsil & District Tank	46/D	Tank	25.04.1998	02.02.1998
6	Sayidullah Khan S/O Aman-ullah Khan Village & P.O. Madani, Tehsil Kulachi, District DI Khan	47/D	Tank	25.04.1998	02.02.1998
7	Muhammad Hadeem Siddiqi S/O Ghulam Yaseen, Sitaiqi House Faqir Abad Behind Commerce College DI Khan	48/D	DI Khan	25.04.1998	02.02.1998
8	Tauheed Khan s/o Abdul Hamid Khan, Village Kirri Mahang, District DI Khan	49/D	DI Khan	25.04.1998	02.02.1998

(SHAUKAT ANJAS) PSP  
Regional Police Officer  
Dera Ismail Khan

No. 3477-8/ES.  
Copies to:-

1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for favour of information w.r.t letter No. quoted above, please.
2. The Registrar, Khyber Pakhtunkhwa Service Tribunal Peshawar.
3. The District Police Officer, D.I. Khan to issue gazetted notification accordingly.
4. The District Police Officer, Tank to issue gazetted notification accordingly.
5. Mr. Abdul Hai Khan, DSP, Assistant Director, Anti-Corruption Establishment DI Khan
6. Mr. Syed Inayat Ali Amjad, DSP, Acting SP Investigation, Kohat
7. Mr. Zia Hassan, DSP, Acting SP Investigation, Bannu
8. Mr. Salah ud Din, DSP, SP Security, CCP Peshawar
9. Mr. Shafi Ullah, DSP, Acting DPO Karak.
10. Mr. Tauheed Khan DSP, Acting SP Special Branch, South of Bannu.

(SHAUKAT ANJAS) PSP  
Regional Police Officer  
Dera Ismail Khan



(46)

OFFICE OF THE  
REGIONAL POLICE OFFICER,  
DERA ISMAIL KHAN REGION

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

No. /ES dated D.I.Khan the 30/06/2022  
**ORDER (REVISION OF DATES OF PROMOTION FROM THE RANK OF ASI TO SI)**

In compliance with the execution Judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020 in Service Appeal No.991/2018, titled Abdul Hai Khan, Deputy Superintendent of Police, Vs. Govt. of Khyber Pakhtunkhwa, through Home Secretary and 27 others, & direction of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPB/421 dated 16.11.2021, & in supersession of all previous orders issued by this office, from time to time, with regard to the promotion of the petitioner and the respondents in the said Service Appeal No.991/2018, from the rank of Assistant Sub-Inspector (ASI) to that of Sub-inspector (SI), severally and collectively, and in the exercise of powers conferred on me by PRs 13.1 and 13.10 of the Police Rules, 1934, read with the Promotion Policy, provided in the Establishment Code Khyber Pakhtunkhwa (ESTA CODE) (Revised Edition) 2011, dates of their promotions from the rank of Assistant Sub-Inspector of Police (ASI) to that of Sub-Inspector (SI), are hereby revised in the manner provided in the table below:

Table: Table showing revised dates of promotions of the petitioner and respondents from the rank of ASIs to SI:

1	2	3	4	5	6
S/No	Name & Address	Range No. Allotted	Distt. To which posted	Previous date of promotion as Sub Inspector	Revised Date of Promotion as Sub-Inspector
1	MR. Abdul Hai Khan, Assistant Sub-Inspector	27/D	DI Khan	24.01.2002	23.11.2001
2	MR. Syed Inayat Ali Amjad, Assistant Sub-Inspector	28/D	DI Khan	24.01.2002	23.11.2001
3	MR. Kalim Ullah, Assistant Sub-Inspector	37/D	DI Khan	23.11.2001	23.11.2001
4	MR. Zia Hassan, Assistant Sub-Inspector	45/D	Tank	25.01.2002	13.12.2001
5	MR. Salah-ud-Din Ayub, Assistant Sub-Inspector	46/D	Tank	23.11.2001	24.01.2002
6	MR. Shafiullah Khan, Assistant Sub-Inspector	47/D	Tank	13.12.2001	24.01.2002
7	MR. Mohammad Nadeem Siddiqi Assistant Sub-Inspector	48/D	DI Khan	24.01.2002	24.01.2002
8	MR. Tauhid Khan, Assistant Sub-Inspector	49/D	DI Khan	23.11.2001	25.01.2002

(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan

No. 4570-78/ES,

Copies to: -

1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for favour of information w.r.t letter No. quoted above, please.
2. The Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar, w.r.t letter No. 4138/ST dated 28.12.2020, please.
3. The District Police Officers, DI Khan & Tank. Necessary Gazette notification may be issued accordingly.
4. Mr. Abdul Hai Khan, DSP, Assistant Director, Anti-Corruption Establishment DI Khan
5. Mr. Syed Inayat Ali Amjad, DSP, Acting SP Investigation, Kohat
6. Mr. Zia Hassan, DSP, Acting SP Investigation, Bannu
7. Mr. Salah ud Din, DSP, SP Security, CCP Peshawar
8. Mr. Shafi Ullah, DSP, Acting DPO Karak.
9. Mr. Tauheed Khan, DSP, Acting SP Special Branch, South at Bannu.

(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan

*Attached to  
the file copy  
Adv. Zia  
Khan*

29/06/2022



47

OFFICE OF THE  
REGIONAL POLICE OFFICER,  
DERA ISMAIL KHAN REGION  
☎ 0966-9280291 Fax # 9280290  
✉ estt.rpo.dik@gmail.com

No. /ES dated D.I.Khan the 30/06/2022  
O R D E R (REVISION OF DATES OF CONFIRMATION IN THE RANK OF SI)

In compliance with the execution Judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020 in Service Appeal No.991/2018, titled Abdul Hai Khan, Deputy Superintendent of Police Vs: Govt. of Khyber Pakhtunkhwa, through Home Secretary and 27 others, & direction of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPB/421 dated 16.11.2021, & in supersession of all previous orders issued by this office, from time to time, with regard to the confirmation of the petitioner and the respondents in the said Service Appeal No.991/2018 in the rank of Sub-inspector (SI), severally and collectively, and in the exercise of powers conferred on me by PR. 13.10(2) and 13.18 of the Police Rules, 1934, read with the Promotion Policy, provided in the Establishment Code Khyber Pakhtunkhwa (ESTA CODE) (Revised Edition) 2011, dates of their confirmation in the rank of Sub-Inspector (SI), are hereby revised in the manner provided in the table below:

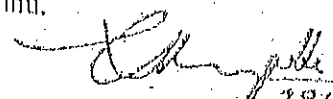
Table: Table showing revised dates of confirmation of the petitioner and respondent in the rank SI

1	2	3	4	5	6
S/No	Name & Address	Allotted Range No.	Date of Promotion	Previous date of confirmation in the rank of Sub-Inspector (SI)	Revised Date of confirmation in the rank of Sub-Inspector (SI)
1	MR. Abdul Hai Khan, Assistant Sub-Inspector	27/D	23.11.2001	24.01.2004	23.11.2003
2	Syed Inayat Ali Amjad, Assistant Sub-Inspector	28/D	23.11.2001	24.01.2004	23.11.2003
3	MR. Kalim Ullah, Assistant Sub-Inspector	37/D	23.11.2001	21.04.2004	23.11.2003
4	MR. Zia Hassan, Assistant Sub-Inspector	45/D	13.12.2001	25.01.2004	13.12.2003
5	MR. Salah-ud-Din Ayub, Assistant Sub-Inspector	46/D	24.01.2002	23.11.2003	24.01.2004
6	MR. Shafiqullah Khan, Assistant Sub-Inspector	47/D	24.01.2002	13.12.2003	24.01.2004
7	MR. Mohammad Nadeem Siddiqi Assistant Sub-Inspector	48/D	24.01.2002	16.07.2005	24.01.2004
8	MR. Tauhid Khan, Assistant Sub-Inspector	49/D	25.01.2002	23.11.2003	25.01.2004

(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan

No. 4580-88/ES,  
Copies to: -

1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for favour of information w.r.t letter No. quoted above, please.
2. The Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar, w.r.t letter No. 4138/ST dated 28.12.2020, please.
3. The District Police Officers, DI Khan & Tank. Necessary Gazette notification may be issued accordingly.
4. Mr. Abdul Hai Khan, DSP, Assistant Director, Anti-Corruption Establishment DI Khan
5. Mr. Syed Inayat Ali Amjad, DSP, Acting SP Investigation, Kohat
6. Mr. Zia Hassan, DSP, Acting SP Investigation, Bannu
7. Mr. Salah ud Din, DSP, SP Security, CCP Peshawar
8. Mr. Shafi Ullah, DSP, Acting DPO Karak.
9. Mr. Tauheed Khan, DSP, Acting SP Special Branch, South at Bannu.

  
(SHAUKAT ABBAS) PSP  
Regional Police Officer  
Dera Ismail Khan  
29/08/2022

Attached to be for copy. Adv. Tauheed Khan



KHYBER PAKHTUNKHWA  
BAR COUNCIL

ADVOCATE HIGH COURT

MUHAMMAD ABDULLAH

Advocate.

bc-09-0944

Date of issue: June 2021

Valid upto: June 2024



وکالت نامہ

کورٹ  
فیس

Before the Honorable K.P. Service Tribunal

Appellant

Govt of KPK etc

منجانب

Case No. D.I. (Clem)

Nisar Muhammad Khan

دعوی یا جرم

Service Appeal.

تفصیل دعوی یا جرم

باعث تحریر آنکہ

DI Khan

Muhammad Abdallah Baloch (AHC) / Zunairah Kanwal (AHC)

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے داخلہ پوری جواب دہی برائے پیشی یا تفسیر مقدمہ نام

کے حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا پوری رو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت اپکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پوری کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر مقام پکھری کے علاوہ اور باقی سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا ایسے واسطے کسی معاوضہ کے ادا کرنے یا منت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔

جو کھل ساختہ پر وادعت صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعوی یا جواب دعوی یا درخواست اجراء اسانے ذکر کی نظر ثانی اپیل نگرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر مائش یا راضی نامہ و فیصلہ برعکس کرنے اقبال دعوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مقرر ہونے اور پکھری صدر پوری مقدمہ مقررہ نظر ثانی اپیل و نگرانی و برآمدگی مقدمہ یا منسوخا ذکر کی ایک طرف یا درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از فیصلہ اجرائے ذکر کی بھی صاحب موصوف کو بشرط ادا کسی طے شدہ نفاذ پوری کا اختیار ہو گا اور تمام ساختہ پروادعت صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مقررہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل نگرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا غیر منکر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر تانوں کو بھی ہر امر میں دانا اور دینے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التزام پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پوری نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ مسترد ہے

12-12-2022 تاریخ 4 ستمبر 2022

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

*(Signature)*

Nisar Muhammad Khan - - - - - appellant.