



Form- A
FORM OF ORDER SHEET


Court of _____

Case No. 1118/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08/09/2014	<p>The appeal of Mr. Shahinshah presented today by Mr. Khan Akbar Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	9-9-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on 26-11-2014</p> <p style="text-align: right;"> CHAIRMAN</p>

3.
Reader Note:

26.11.2014 Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 11.02.2015 for the same.


Reader

4.
11.02.2015

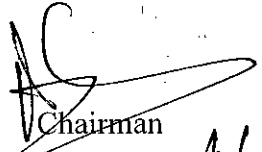
Counsel for the appellant present. Requested for adjournment. Adjourned for preliminary hearing to 11.3.2015 before S.B.


Chairman

11.03.2015

Counsel for the appellant present. Submitted application for withdrawal of appeal in service appeal No. 1121/14, in the light whereof, the appeal is dismissed as withdrawn. File be consigned to the record.

ANNOUNCED
11.03.2015


Chairman
11.03.2015

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR.

Service Appeal No. 1119 /2014

Shahinshah

Versus

Inspector General Of Police & others

INDEX

Serial No.	Description of documents	Annexure	Page No.
1.	Memo Of appeal along-with Affidavit		1-5
2.	Copy of Notification No.2394/ES dated 25.04.2014	"A"	6-11
3.	Copy Mercy/Review Petition	"B"	12-13
4.	Copy of Rejection Order dated 28 th May 2014	"C"	14-15
5.	Copy of Representation/Departmental appeal	"D"	16
6.	Copy of Seniority List	"E"	17-20
7.	Copy of Service Record	"F"	21-22
8.	Wakalat Nama		23


Appellant

Through


(KHAN AKBAR KHAN)

Advocate, Peshawar.

Office: - 107-B, Town Tower,
Jahangir Abad, University
Road, Peshawar.

Cell No. 0344-9111911

Dated: 04/09/2014

①

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR.

Service Appeal No. 1119 /2014

Shahenshah Head Constable No.605,
I/C Police Post Daran,
Police Station Permoli,
District Swabi

A.W.F. Peshawar
11/9/2014

..... **Appellant**
Versus

- 1). Inspector General of Police, Khyber PakhtunKhwa, Peshawar.
- 2). Deputy Inspector General of Police, Mardan Region-I, Mardan.
- 3). District Police Officer, Swabi.
- 4). Rab Nawaz ASI, Operation Wing Mardan.
- 5). Akhtar Hussain ASI, Investigation Wing Nowshera.
- 6). Abdul Wahab, ASI, Operation Wing Swabi.
- 7). Hashmat Khan, ASI, Investigation Wing Mardan.
- 8). Abdul Ghaffar, ASI, Investigation Wing Mardan.
- 9). Amjad Iqbal ASI, Operation Wing Mardan.
- 10). Faiz Muhammad ASI, Investigation Wing Mardan.
- 11). Raza Khan ASI, Operation Wing Swabi.
- 12). Muhammad Naeem ASI, Operation Wing Swabi.
- 13). Ayaz Ali ASI, Operation Wing Mardan.
- 14). Bashir Muhammad ASI, Investigation Wing Mardan.
- 15). Gul Malik ASI, Operation Wing Nowshera.
- 16). Salim Nawaz ASI, Investigation Wing Mardan.
- 17). Ayaz Muhammad ASI, Investigation Wing Swabi.
- 18). Abdus Salam ASI, Operation Wing Mardan.
- 19). Javed ASI, Investigation Wing Mardan.
- 20). Shahi Mulk ASI, Operation Wing Mardan.
- 21). Zulfiqar ASI, Operation Wing Mardan.
- 22). Shahab ASI, Operation Wing Swabi.
- 23). Niaz Muhammad ASI, Operation Wing Swabi
- 24). Gul Bahadur ASI, Operation Wing Mardan.

8/9/14

- 25. Sabir Khan ASI, Investigation Wing Mardan.
- 26. Sajjad Ahmad, ASI, Operation Wing Mardan.
- 27. Wajid Ali ASI, Operation Wing Mardan.
- 28. Niaz Muhammad ASI, Operation Wing Mardan.
- 29. Mudassir Khan ASI, Operation Wing Mardan.
- 30. Baswar Khan ASI, Investigation Wing Mardan.
- 31. Muhammad Zahir ASI, Investigation Wing Mardan.

.....Respondents

=====

**APPEAL UNDER SECTION 4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST THE ORDER
DATE 25.04.2014, WHEREBY THE PROMOTION
OF APPELLANT WAS SUSPENDEND FOR NO
GOOD REASONS.**

=====

PRAYER IN APPEAL:-

**ON ACCEPTANCE OF THE INSTANT
APPEAL, THE ORDER DATED
25.04.2014 MAY KINDLY BE SET ASIDE
AND THE RESPONDENT MAY
GRECIOUSLY BE DIRECTED TO ISSUE
PROMOTION ORDERS OF THE
APPELLANT AS ASI, KEEPING IN VIEW
HIS SERVICE RECORD**

=====

RESPECTFULLY SHEWETH:

1. That the appellant was enlisted as Constable in the police department in the year 1995 and is performing his duties as Head Constable, In-charge Police Post Daran, Police Station Permoli, District Swabi, thus he has more than 19 years of service at his credit.
2. That during the entire service, performance of the appellant was up-to the entire satisfaction of his superiors. During the duties his performance remained good and there were no complaints against him regarding his performance of duty or otherwise.
3. That respondent No. 2 vide his Notification No. 2394/ES dated 25.04.2014 suspended the promotion of appellant

without just cause and reason and by superseding the appellant, his junior colleagues were promoted to the higher rank. (Copy of the Notification No.2394/ES dated 25.04.2014 is attached herewith as **Annexure "A"**).

- 4. That against the said Notification, the appellant on dated 29.04.2014 filed a mercy/review petition before the respondent No.2 for reviewing/reversing his order referred to above in the best interest of justice, but the same was filed vide Order No. 2910/ES dated 28th May 2014. (Copies of the mercy/review petition and rejection order dated 28th May 2014 are attached herewith as **Annexure: - "B" & "C"** respectively).
- 5. That then on dated 22.05.2014, the appellant filed his representation/departmental appeal before the Respondent No.1, being competent authority but the same was not decided by the respondent No.1 within the statutory period. (Copy of representation/departmental appeal is attached herewith as **Annexure: - "D"**).
- 6. That the appellant being aggrieved from the above-mentioned impugned Notification/order dated 25.04.2014, the appellant, after expiry of statutory period, approaches this Honorable Tribunal, on the following grounds inter-alia.

GROUND:-

- A). That the impugned Notification/Orders dated 25.04.2014 is illegal, unlawful and against the principles of nature justice, hence untenable and liable to be set aside
- B). That as per seniority list of Head Constables of Mardan Region , which stood on 31.12.2013, respondents No. 4 to 31 are junior to the appellant, but despite that the appellant was superseded by the respondent No.2 (Copy of the Seniority List is attached herewith as **Annexure "E"**).
- C). That the appellant having excellent ACR, was ignored by respondent No.2 while his junior colleagues having low qualification were promoted by superseding the appellant, in order to benefit the blue eyed employees in the department. Which is against the law and natural justice.
- D). That the appellant during his entire service never used any type of political pressure whatsoever and allegations of

respondent No.2 regarding use of political pressure is based on assumption and presumption, without any sort of evidence, the appellant has performed his duties honestly, which has always been appreciated by the superior officers. Hence all the allegations are categorically denied.


- E). That the entire service and service roll of the appellant is a strong proof of his efficiency, honesty and merit and due to his efficiency the appellant was promoted as Head Constable in the year 2008, qualified intermediate college course in 2010/2011 and was awarded with cash reward CC-III, while the appellant got "A" report from his superior officers in his ACRs. (Copies of service record are attached herewith as **Annexure "E"**).
- F). That the appellant has served in the police department for long span of time, with unblemished/spotless record. During his service he obtained various commendations certificate, regarding his efficiency and remarkable work.

For the afore mentioned reasons, It is, therefore, humbly prayed that on acceptance of this Appeal, the impugned Notification/order dated 25.04.2014, may kindly be set aside and the appellant may graciously be promoted as ASI, keeping in view his service record.

Any other relief deemed fit by this Hon'ble Tribunal under the circumstances, may also graciously be granted in favor of the appellant.


Appellant

Through


(KHAN AKBAR KHAN)

&


(SAIFULLAH MOHMAND)

Advocate, Peshawar.

Dated: -04/09/2014

CERTIFICATE:

Certified that as per information furnished by my client no such like service appeal on the subject has earlier been filed in this Hon'ble Tribunal.


ADVOCATE

5

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR.

Service Appeal No. _____/2014

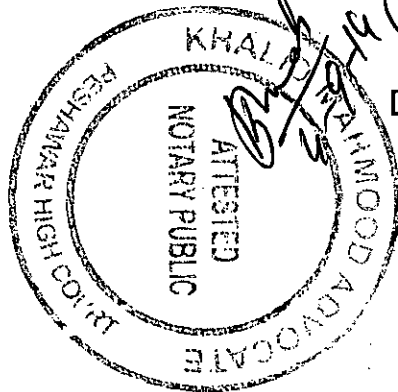
Shahenshah

Versus

Inspector General of Police & others

AFFIDAVIT

I, Shahenshah Head Constable No.605, I/C Police Post Daran, Police Station Permolli, District Swabi, do hereby solemnly affirm and declare on oath that the contents of accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT

DEPARTMENT.

MARDAN REGION.

Annex (A)

**PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDERS BY THE DEPUTY INSPECTOR GENERAL OF POLICE, MARDAN REGION**

NOTIFICATION.

Dated 25-4-2014

No. 2394 /ES, PROMOTION IN THE RANK OF OFFICIATING ASIS:-

As approved by the Departmental Promotion Committee meeting held on 15.04.2014, the following Head Constables (on list D) of Mardan Region have considered suitable for promotion as Offg. ASIs. On promotion they are posted to the District/Units as noted against each:-

S. No.	Name & Rank	From	To
1.	HC Abdul Wahid No. 359	Nowshera District (On promotion)	Operation Wing, Nowshera
2.	HC Anan Ullah No. 161	Mardan District (On promotion)	Operation Wing, Mardan
3.	HC Mehboob Ali No. 1032	Mardan District (On promotion)	Operation Wing, Mardan
4.	HC Azam Khan No. 57	Mardan District (On promotion)	Operation Wing, Mardan
5.	HC Shujat Khan No. 671	Swabi District (On promotion)	Operation Wing, Swabi
6.	HC Safdar Iqbal No. 826	Mardan District (On promotion)	Operation Wing, Mardan
7.	HC Noor ul Islam No. 799	Invest: Wing Swabi (On promotion)	Invest: Wing, Swabi
8.	HC Naik Sar Ali Khattak No. 588	Nowshera District (On promotion)	Invest: Wing Nowshera
9.	HC Sajjad Haider No. 1096	Swabi District (On promotion)	Operation Wing, Swabi
10.	HC Tariq Ali No. 1390	Mardan District (On promotion)	Invest Wing, Charsadda
11.	HC Mazhar Ali No. 854	Swabi District (On promotion)	Operation Wing, Swabi
12.	HC Siraj Nabi No. 109	Mardan District (On promotion)	Operation Wing, Mardan
13.	HC Rab Nawaz No. 744	Mardan District (On promotion)	Operation Wing, Mardan
14.	HC Akhtar Hussain No. 1198	Mardan District (On promotion)	Invest: Wing, Nowshera
15.	HC Abdul Wahab No. 88	Swabi District (On promotion)	Operation Wing, Swabi
16.	HC Hashmat Khan No. 1131	Mardan District (On promotion)	Invest: Wing, Mardan
17.	HC Abdul Ghaffar No. 906	Mardan District (On promotion)	Invest: Wing, Mardan
18.	HC Amjid Iqbal No. 382	Mardan District (On promotion)	Operation Wing, Mardan
19.	HC Faiz Muhammad No. 658	Mardan District (On promotion)	Invest: Wing, Mardan
20.	HC Raza Khan No. 507	Swabi District (On promotion)	Operation Wing, Swabi
21.	HC Muhammad Naeem No. 732	Swabi District (On promotion)	Operation Wing, Swabi
22.	HC Ayaz Ali No. 234	Mardan District (On promotion)	Operation Wing, Mardan
23.	HC Bashir Muhammad No. 96	Mardan District (On promotion)	Invest: Wing, Mardan

3042
2/5/14

Etc

D. P. S. Swabi
24/4/14

APPROVED
SAIF ULLAH
Advocate
High Court Peshawar

24.	HC Gul Malik No. 174	Nowshera District (On promotion)	Operation Wing, Nowshera
25.	HC Saleem Nawaz No. 1059	Mardan District (On promotion)	Invest: Wing, Mardan
26.	HC Ayaz Muhammad No. 46	Swabi District (On promotion)	Invest: Wing, Swabi
27.	HC Abdus Salam No. 1307	Mardan District (On promotion)	Operation Wing, Mardan
28.	IIC Javid No. 834	Mardan District (On promotion)	Invest: Wing, Mardan
29.	HC Shahi Mulk No. 394	Swabi District (On promotion)	Invest: Wing, Swabi
30.	HC Zulfiqar No. 1019	Mardan District (On promotion)	Operation Wing, Mardan
31.	HC Shahab No. 418	Swabi District (On promotion)	Operation Wing, Swabi
32.	HC Niaz Muhammad No. 720	Swabi District (On promotion)	Operation Wing, Swabi
33.	HC Gul Bahadur No. 1033	Mardan District (On promotion)	Operation Wing, Mardan
34.	HC Sabir Khan No. 1266	Mardan District (On promotion)	Invest: Wing, Mardan
35.	HC Sajjad Ahmad No. 1327	Mardan District (On promotion)	Operation Wing, Mardan
36.	HC Wajid Ali No. 626	Mardan District (On promotion)	Operation Wing, Swabi
37.	HC Niaz Muhammad No. 652	Mardan District (On promotion)	Operation Wing, Mardan
38.	IIC Mudasir Khan No. 447	Mardan District (On promotion)	Operation Wing, Charsadda
39.	HC Baswar No. 1237	Mardan District (On promotion)	Invest: Wing Nowshera
40.	HC Muhammad Zahir No. 1152	Mardan District (On promotion)	Invest: Wing, Mardan

Besides the following Head Constables on promotion to list "D" have considered conditionally for promotion as Offg: ASIs on the production of satisfactory ACRs for the prescribed period within 15 days. Otherwise their promotion order will be considered as cancelled. On promotion they are posted to the Districts/ Units as noted against each:-

S. No.	Name & Rank	From	To	Remarks
1.	HC Gul Akbar No. 784	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
2.	HC Ameer Nawab No. 774	Mardan District (on promotion)	Invest: Wing, Nowshera	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
3.	HC Roshan Akbar No. 517	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
4.	HC Shafi Ullah No. 983	Mardan District (On promotion)	Operation Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
5.	IIC Abid Hussain No. 867	Mardan District (On promotion)	Invest: Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
6.	HC Aziz Ur Rehman No. 1533	Mardan District (On promotion)	Operation Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
7.	IIC Syed Nasir Ahmad No. 640	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the period from 01.01.2012 to 18.07.2012 & for the year 2013

S. Ullah
SAM ULLAH
 Addl. Commr.
 1st Commr.
 23/07/2013

8.	HC Yasin Shah No. 1225	Mardan District (On promotion)	Operation Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 & 2013
9.	HC Muhammad Jehangir No. 1355	Mardan District (On promotion)	Invest: Wing Nowshera	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
10.	HC Ajmal Khan No. 705	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
11.	HC Muhammad Ilyas No. 890	Mardan District (On promotion)	Invest: Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
12.	HC Said Ul Amin No. 196	Swabi District (On promotion)	Invest: Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
13.	HC Saif Ul Islam No. 1054	Mardan District (On promotion)	Invest: Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
14.	HC Iftikhar Shah No. 717	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
15.	HC Jehangir Khan No. 1324	Mardan District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
16.	HC Parwar Ali No. 261	Mardan District (On promotion)	Invest: Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
17.	HC Faqir Ahmad No. 207	Mardan District (On promotion)	Invest: Wing Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
18.	HC Rab Nawaz No. 381	Swabi District (On promotion)	Invest: Wing Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
19.	HC Shah Jehan No. 583	Mardan District (On promotion)	Invest: Wing Charsadda	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 2013

The following Head Constables on promotion to list "D" have considered suitable for promotion as Offg: ASIs & recommended for transfer to CTD Khyber Pukhtunkhwa, Peshawar as noted against each:-

S. No.	Name & Rank	Home District /Place of Posting	Recommended for CTD	Remarks
1.	HC Ali Akbar No. 881	Mardan District	Recommended for CTD	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
2.	HC Fazal Khaliq No. 354	Mardan District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
3.	HC Ibrar Ali No. 267	Mardan District (on deputation to Special Branch)	-do-	Nil
4.	HC Shah Jehan No. 186	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 & 2013
5.	HC Fazal Dawood No.	Mardan District	-do-	Nil
6.	HC Ameer Nawaz No 3	Swabi District	Presently serving in CTD	Nil

High Court Peshawar

APPROVED
FOR THE GOVT

934

14

7.	HC Fazal Hussain No. 116	Swabi District	Recommended for CTD	Nil
8.	HC Qasim No. 203	Swabi District	Presently serving in CTD	Nil
9.	HC Farooq No. 78	Swabi District	Recommended for CTD	Nil
10.	HC Subhan Ullah No. 868	Swabi District	-do-	Nil
11.	HC Safdar Rehman No. 215	Swabi District	-do-	Nil
12.	HC Fazal Akbar No. 433	Swabi District	-do-	Nil
13.	HC Amjid No. 1104	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
14.	HC Khan Muhammad No. 112	Swabi District	-do-	Nil
15.	HC Akhtar Munir No. 708	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
16.	HC Muhammad Zubair No. 22	Swabi District	-do-	Nil
17.	HC Shah Hussain No.	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
18.	HC Jehan Dad No. 1140	Swabi District	-do-	Nil

Besides the above recommendation made by the DPC held on 15.04.2014, the following Head Constables (on list D) of Mardan Region have considered suitable for promotion as Offg: ASIs. On promotion they will remain posted to the Units as noted against their names:-

S. No.	Name & No.	On deputation to	S. No.	Name & No.	On deputation to
1	HC Irshad Ahmad No. 611	Motorway Police	2	HC Bakht Ul Ayan No. 2100	Elite Force
3	HC Mukhtiar Ali No. 896	Elite Force	4	HC Amir Shad No. 205	Motorway Police
5	HC Ali Said No. 198	PTC Hangu	6	HC Mushtaq Ahmad No. 926	PTC Hangu
7	HC Aurang Zeb No. 1325	PTC Hangu	8	HC Atta Ur Rehman No. 156	Traffic Peshawar
9	HC Farhad Ali No. 58	Special Branch	10	HC Noorul Islam No. 1106	Traffic Peshawar
11	HC Anees Ahmad No. 198	Traffic Peshawar	12	HC Istikhar Ahmad No. 891	Motorway Police

The following Head Constables on promotion to list "D" have considered conditionally for promotion as Offg: ASIs on the production of satisfactory ACRs for the prescribed period within 15 days. Otherwise their promotion order will be considered as cancelled. On promotion they will remain posted to the Units as noted against their names:-

S. No.	Name & No.	On deputation to	Remarks
1	HC Waqif Khan No. 600	Special Branch	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 & 2013
2	HC Irad Ali No. 248	PTC Hangu	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2012
3	HC Muhammad Tahir No. 408	PTC Hangu	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
4	HC Fakhar e Alam No. 590	CCP Peshawar	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
5	HC Jehangir No. 415.	Motorway Police	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013

[Signature]
SAT ULLAH
 Head Constable

APPROVED
[Signature]

10

17

The following Head Constables have been deferred/superseded due to reason noted against each:-


S. No.	Name & rank	Place of posting	Remarks
1.	IHC Miraj Habib No. 676	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
2.	IHC Zahir Ahmad No. 910	CTD Peshawar	Superseded due to inefficiency & putting Political pressure for choice posting
3.	IHC Muhammad Arif No. 1357	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
4.	IHC Noorul Amin No. 216	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
5.	IHC Murad Khan No. 717	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
6.	IHC Usman Ghani No. 1205	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
7.	IHC Bakhtawar Shah No. 809	CHD	Deferred due to under enquiry
8.	IHC Abdur Riaz No. 406	NSR	Superseded due to inefficiency & putting Political pressure for choice posting
9.	IHC Saeed Ullah No. 225/1899	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
10.	IHC Wali Muhammad No. 23	Crime Branch Invest:	Superseded due to inefficiency & putting Political pressure for choice posting
11.	IHC Mushtaq Ali No. 1244	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
12.	IHC Ghulam Rasool No. 878	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
13.	IHC Ayub Jan No. 1224	Mardan	Deferred due to "C" class report (adverse) for the year 2013
14.	IHC Ali Akbar No. 64	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
15.	IHC Mumriaz Gul No. 469	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
16.	IHC Zahir Shah No. 629	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
17.	IHC Alamgir No. 303	Mardan	Deferred due to "C" class report (adverse) for the year 2013
18.	IHC Shahenshah No. 605	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
19.	IHC Mohamanday No. 974	Mardan	Deferred due to "C" class report (adverse) for the year 2013
20.	IHC Nisar Khan No. 673	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
21.	IHC Zaid Muhammad No. 1607	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
22.	IHC Naeem Khan No. 912	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting

SAIFULLAH
 Deputy Commissioner
 Peshawar

APPROVED
 10/10/2013

23.	IHC Amjid Ali No. 843	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
24.	IHC Kameen Khan No. 264	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
25.	IHC Imtiaz Khan No. 1584	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
26.	IHC Farooq Hussain No. 823	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
27.	IHC Javid Ahmad No. 1292	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
28.	IHC Umar Hayat No. 522	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
29.	IHC Hamayun No. 118	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
30.	IHC Aziz Ur Rehman No. 1588	Mardan	Deferred due to inefficiency
31.	IHC Niaz Ali No. 1287	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
32.	IHC Imran Ali No. 1615	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
33.	IHC Janab Ali No. 553	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
34.	IHC Ghaffar Ali No. 785	Swabi	Deferred due to inefficiency
35.	IHC Noor Muhammad No. 1489	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
36.	IHC Fawad Ali No. 1167	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
37.	IHC Bakht Zada No. 56	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting

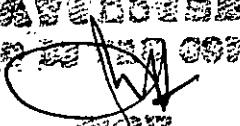
Their promotion will take effect from the date they actually take over the charge of their higher responsibilities at their new place of posting.


 MUHAMMAD SAEED)PSP
 Deputy Inspector General of Police,
 Mardan Region-I, Mardan.

No. 2395-2411/ES,

1. Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar.
2. Inspector General of National Highways & Motorway Police House No. 7, Kaghan Road Sector F-8/3 Islamabad.
3. Additional Inspector General of Police Special Branch Khyber Pukhtunkhwa, Peshawar.
4. Capital City Police Officer, Peshawar.
5. Deputy Inspector General of Police Traffic, Khyber Pukhtunkhwa, Peshawar.
6. Deputy Inspector General of Police, CTD, Khyber Pukhtunkhwa, Peshawar.
7. Commandant Police Training College, Hangu.
8. Commandant Elite Force Khyber Pukhtunkhwa, Peshawar.
9. Deputy Inspector General of Police N-5 North Zone, National Highways & Motorway Police Islamabad.
10. All District Police Officers, in Mardan Region-I, Mardan.
11. All SPs Investigation, in Mardan Region-I, Mardan.
12. PA to DIG, Mardan.

(*****)

APPROVED

 High Commission

جناب صاحب DIQ صاحب مردان رحین دن مردان

مخبر خواست لیسلسہ پروفیشنل کالج "ASI"

جناب عالی!

گزارش کی جاتی ہے کہ سائل فورم 12 06 کو جسٹس کیش عرفی سوکر
 سائل نے اپنی ڈیوٹی بنائے ایمانداری اور سن 1995 سے اس کی اور بہتری سے انجام
 دینے ہوئے حکمانہ امتحانات پاس کر کے کورس سکول کورس اور اسٹریٹجک
 سکول کورس PTC ہنگو سے اچھے نمبروں سے پاس کر کے "D"
 کسٹ ہڈ کیش پشاور میں ہو چکا ہوں۔ سائل نے عمر 18 سال
 ملازمت میں کبھی بھی کوئی الیگنڈم نہیں اٹھایا ہے جس سے سائل
 کو نڈمٹ اور شرفی کا سا فائدہ ہو کر کورس کی ترقی کی بددعا ہوئی
 ہو اور نہ ہی کسی قسم کی سفارش کا سہارا لیکر ڈیوٹی انجام دی ہے
 بلکہ افسر ان باہر کے ہر جائز حکم احکام کی بروقت قوری طور پر
 تعمیل کرتے ہوئے اپنے جائز الیگنڈم میں حاضر رہا ہے اور اسے
 افسر ان باہر کو کسی قسم کی شکایت کا موقع نہیں دیا ہے۔

حالیہ حکمانہ پروفیشنل کالج میں سائل کا نام ضلع ہوابال سے منتخب
 ہو کر سائل فورم 4 15 کو آپ جناب DIQ صاحب اور دیگر

افسر ان باہر کو پیش ہوا - 2014

SAIF ULLAH

SAIF ULLAH
 Advocate
 High Court Peshawar

SAIF ULLAH

مگر سائل کو اچھی لوڑی اور سالانہ "ACR" رپورٹ "A" کے ماوجود
 "Superseded" کیا جا کر سائل کو نظر انداز کیا جیسا سائل سے
 جوئیہ اور تعلیمی لحاظ سے کمزور اہلکاروں کو بہ عہدہ "Asi" پر دھوٹ
 کئے گئے جو کہ سائل کے ساتھ سر اسرنا الصافی ہے۔

سائل کا اللہ تعالیٰ کی پاک بابرکت ذات کے بعد واحد سہارا
 آرزو ہے۔ DIQ صاحب کے علاوہ کوئی اور نہیں ہے جس کے
 دوسرے سائل اپنی فریاد کے اور نہ ہی سائل کسی اور جگہ اپنی فریاد
 لیجانے کی استطاعت رکھتا ہے۔

اعدد لکھنا سول کے آرزو ہے۔ DIQ صاحب درخواست پر ہدفانہ
 اور رد عملانہ نظر ثانی فرما کر سائل کا نام "سپر سید" سے
 نکالنے اور بہ عہدہ "Asi" ترقیاً بکرت کا حکم صادر فرما کر
 تمام سائل فزید خدمت صلحی جا رہا لو کر اہل عمال کیلئے حلال روزی کا
 سکے۔ سائل ناظم دعا گو ہے گا۔

تاریخ 30/4/14

الغافل

آج صلیب کا مالج حکم ہنساہ طان 605 حصہ اعجازی چوہی دین نماز
 11/12

SAIF ULLAH
 Advocate
 High Court Peshawar

OR

[Handwritten signature]

(14)
(10)

Annex (C)
Filed
Time 03:47 PM
Dy: 28-5-14

Government of Khyber Pukhtunkhwa
Office of the Deputy Inspector General of Police
Mardan Region-I, Mardan
Phone No. 0937-9230113, Fax No. 0937-9230115

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

To: The Provincial Police Officer,
Khyber Pukhtunkhwa, Peshawar.

No. 2810 /ES.

28, May, 2014.

Subject: DETAIL OF ORDERLY ROOM HELD AT REGION OFFICE, MARDAN.

Memo:

Details of orderly room held in this office on 21.05.2014 is submitted below please: -

S.No.	Name & Rank	Purpose of appearance	Order of the undersigned
1.	Inspector Mumtaz Ali MR/74	Request for transfer to Swabi District	Keep pending
2.	SI Ajab Khan	Request for transfer to Investigation, Wing,	Requested accepted
3.	SI Rashid Ullah	Request for cancellation of his transfer order from Invest: Wing, Charsadda	Requested accepted
4.	ASI Bashir Muhammad	Request for transfer from Invest: Wing to Police Lines	Next OR
5.	PASI Masood Khan	Request for re-instatement in service from date of suspension & for filing of departmental enquiry	Requested accepted
6.	ASI Zia Ul Haq	Request for re-instatement in service from date of suspension & for filing of departmental enquiry	Requested accepted
7.	ASI Hikmat Shah	Request for re-instatement in service from date of suspension & for filing of departmental enquiry	Requested accepted
8.	IHC Bakhtwar Shah	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
9.	IHC Usman Ghani No. 1205	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
10.	IHC Abdur Riaz No. 406	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
11.	IHC Janab Ali No. 553	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
12.	IHC Wali Muhammad	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
13.	IHC Shahenshah No. 605	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
14.	IHC Umar Hayat No. 522	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
15.	IHC Zahir Shah No. 629	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed

Accepted
SAFE ULLAH
Adv.
High Court Peshawar

(16)

Annex (D)

To :-

The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

Subject:-

APPLICATION AGAINST THE ORDER OF DEPUTY INSPECTOR
GENERAL OF POLICE, MARDAN REGION-I, MARDAN DATED
25.04.2014 VIDE WHICH THE PROMOTION OF APPELLANT WAS
SUPERSEDED.

Respectfully,

1. That the appellant was enlisted as Constable in Police Department on 06.12.1995 in District Police Swabi.
2. That on 2003 the appellant was selected for Lower School Course & promoted as Head Constable in the year 2008.
3. That in the year 2011 appellant was selected for intermediate College course, which was successfully qualified by the appellant and got 2st position in Mardan Region-I, Mardan.
4. That the appellant was awarded with cash reward CC-III.
5. That the appellant got "A" reports from superior officers in A.C.Rs
6. That during the entire service the appellant never used any type of political pressure what so ever and remained efficient in the duties.
7. That my entire service and service roll is a strong proof of my efficiency, honesty and merit.

PRAYER.

Therefore, this is very humbly prayed that the order of Deputy Inspector General of Police, Mardan Region-I, Mardan dated 25.04.2014 may very graciously be set aside and the appellant be promoted as ASI keeping in view the service record in the interest of justice.

Dated : 21.05.2014.

Your obediently.

SHAHINSHAH KHAN No.605/IHC
I/C Police Post Daran PS Permolli
District Swabi.
Cell No.0301-8348975.

Reg
for n.a pl
Rv. A/PSO
22/05/14

1698 / E IV
22/5/14

SAIF ULLAH
Advocate
High Court Peshawar

200
215

(17)

ANNEX E
ANNEX (E)

POLICE DEPARTMENT.

MARDAN REGION.

SENIORITY LIST OF "D" LIST HEAD CONSTABLES OF MARDAN REGION. STOOD ON 31.12.2013.

S. No.	Name & No.	Date of Birth	Dated of enlistment	Educ	Date of admission to list "D"	Remarks
1.	IHC Abdus Samad No. 128	27.01.1957	05.03.1975	10 th /MRD	01.10.1994	Not willing for promotion as Offg. ASI for ever
2.	IHC Farman Ghani No. 855	07.02.1971	11.10.1989	BA/MRD	20.03.2004	Not willing for promotion for ever
3.	IHC Muhammad Askar No. 385	07.04.1969	19.06.1988	10 th /MRD	20.03.2004	Not willing for transfer on promotion to Mardan District vide Special Branch letter No. 756/ES dated 07.02.2009 filed in DPC 30.12.2008
4.	IHC Muhammad Ayaz No. 1342	09.01.1970	06.08.1991	10 th /MRD	25.07.2007	Not willing
5.	IHC Sardar Ali No. 1639	01.11.1969	26.09.1988	10 th /MRD	20.03.2010	
6.	IHC Irshad Ahmad No. 611	06.07.1972	25.09.1991	BA/NSR	20.03.2010	
7.	IHC Miraj Habib No. 676	05.02.1975	02.04.1994	10 th /MRD	20.03.2010	
8.	IHC Zahir Ahmad No. 910	12.03.1974	21.09.1993	FA/MRD	20.03.2010	
9.	IHC Abdul Wahid No. 23/359	06.12.1974	15.07.1999	10 th /NSR	20.09.2010	
10.	IHC Aman Ullah No. 161	04.08.1970	01.07.1991	FA/MRD	20.09.2010	
11.	IHC Mehboob Khan No. 1032	01.01.1970	11.04.1991	10 th /MRD	20.09.2010	
12.	IHC Muhammad Arif No. 1357	15.12.1972	13.08.1991	10 th /MRD	20.09.2010	
13.	IHC Noorul Amin No. 216	02.04.1974	24.10.1995	BA/MRD	20.09.2010	
14.	IHC Gul Akbar No. 784	15.01.1970	01.12.1991	FA/SWB	20.09.2010	
15.	IHC Azam Khan No. 57	16.01.1983	26.04.2005	FA/MRD	20.09.2010	
16.	IHC Murad Khan No. 717	01.11.1975	10.03.1996	FA/MRD	20.09.2010	
17.	IHC Ibrar Ali No. 267	16.03.1976	26.06.1996	FA/MRD	20.09.2010	
18.	IHC Bakht ul Ayan No. 210	20.02.1977	26.06.1996	10 th /MRD	20.09.2010	
19.	IHC Mukhtar Ali No. 896	01.01.1977	31.01.1995	FA/MRD	20.09.2010	
20.	IHC Shujat Khan No. 671	01.04.1971	22.02.1992	FA/SWB	20.09.2010	
21.	IHC Niaz Muhammad No. 154	25.12.1970	18.06.1995	FA/MRD	20.09.2010	
22.	IHC Usman Ghani No. 1205	04.02.1972	11.07.1991	10 th /MRD	20.09.2010	
23.	IHC Safdar Rehman No. 215	02.04.1970	16.08.1994	FA/SWB	20.09.2010	
24.	IHC Fazal Akbar No. 433	07.01.1970	23.04.1991	10 th /SWB	20.09.2010	
25.	IHC Safdar Iqbal No. 826	07.11.1971	31.12.1992	10 th /MRD	20.09.2010	
26.	IHC Ameer Nawab No. 774	03.04.1967	28.12.1986	FA/MRD	20.09.2010	
27.	IHC Amir Shad No. 205	01.01.1971	26.06.1996	FA/MRD	20.09.2010	
28.	IHC Bakhtawar Shah No. 809	24.04.1969	01.07.1991	10 th /CHD	20.09.2010	
29.	IHC Abdur Riaz No. 55	11.04.1974	13.11.1998	10 th NSR	20.09.2010	
30.	IHC Imtiaz Ali No. 194	05.06.1975	01.09.1996	10 th /MRD	20.03.2011	
31.	IHC Noorul Islam No. 100/782 (On deputation to PTC Hangu)	08.02.1978	25.4.1998	10 th /SWB	20.03.2011	
32.	IHC Ameer Nawas Khan No. 3	05.11.1973	08.01.1995	BA/SWB	20.03.2011	
33.	IHC Roshan Akbar No. 517	16.03.1970	10.12.1988	10 th /SWB	20.03.2011	
34.	IHC Saeed Ullah No. 225	15.03.1975	17.03.1996	BA/MRD	20.03.2011	
35.	IHC Naik Sar Ali Khattak	01.02.1970	01.07.1990	10 th /MRD	20.03.2011	
36.	IHC Saif Ullah No. 1006	02.03.1968	20.03.1988	FA/SWB	20.03.2011	

(17)

SEARCHED
SERIALIZED
INDEXED
FILED

cap...

SAIF ULLAH
Advocate
High Court Peshawar

Inspector General
documents

with Affidavit
dated

"B"

12
16-17

18

81


38.	IHC Wali Muhammad No. 23 (On deputation to Crime Branch)	02.03.1972	16.01.1994	FA/MRD	20.03.2011	
39.	IHC Mazhar Ali No. 854	17.04.1977	09.06.1996	10 th /SWB	20.03.2011	
40.	IHC Shafi Ullah No. 983	14.01.1975	28.07.1996	FA/MRD	20.03.2011	
41.	IHC Mushtaq Ali No. 1244	14.05.1973	03.08.1994	FA/MRD	20.03.2011	
42.	IHC Ghulam Rasool No. 878	07.01.1971	15.03.1992	10 th /MRD	20.03.2011	
43.	IHC Abid Hussain No. 867	10.01.1972	01.07.1991	10 th /MRD	20.03.2011	
44.	IHC Siraj Nabi No. 109	10.03.1973	25.02.1992	10 th /MRD	20.03.2011	
45.	IHC Ayub Jan No. 1224	05.02.1975	06.03.1995	FA/MRD	20.03.2011	
46.	IHC Ali Akbar No. 64	03.02.1974	12.03.1995	10 th /MRD	20.03.2011	
47.	IHC Mumtiaz Gul No. 469	09.03.1976	21.03.1994	10 th /MRD	20.03.2011	
48.	IHC Zahir Shah No. 629	12.01.1970	01.07.1991	10 th /SWB	20.03.2011	
49.	IHC Aziz Ur Rehman No. 1533	12.02.1971		10 th /MRD	20.03.2011	
50.	IHC Alamgir No. 303	02.01.1977	28.01.1996	10 th /MRD	20.03.2011	
51.	IHC Shahenshah No. 605	30.03.1977	07.12.1995	FA/SWB	20.09.2011	
52.	IHC Rab Nawaz No. 744	10.06.1975	25.04.1995	10 th /MRD	20.09.2011	
53.	IHC Mohamanday No. 974	20.06.1970	08.12.1988	10 th /MRD	20.09.2011	
54.	IHC Akhtar Hussain No. 1198	25.02.1972	20.04.1995	FA/MRD	20.09.2011	
55.	IHC Abdul Wahab No. 88	12.12.1970	16.05.1994	10 th /SWB	20.09.2011	
56.	IHC Hashmat Khan No. 1131	20.02.1971	27.06.1991	10 th /MRD	20.09.2011	
57.	IHC Syed Nasir Ahmad No. 640	06.03.1976	16.11.1995	10 th /SWB	20.09.2011	
58.	IHC Abdul Ghaffar No. 906	04.02.1970	29.03.1992	FA/MRD	20.09.2011	
59.	IHC Amjid Iqbal No. 382	04.02.1976	15.01.1995	FA/MRD	20.09.2011	
60.	IHC Nisar Khan No. 673	25.08.1974	25.06.1994	FA/MRD	20.09.2011	
61.	IHC Zahid Muhammad No. 1607	10.05.1976	06.11.1995	FA/MRD	20.09.2011	
62.	IHC Yasin Shah No. 1225	26.08.1971	12.05.1994	FA/MRD	20.09.2011	
63.	IHC Amjid Ali No. 1104	30.03.1970	22.01.1995	BA/SWB	20.09.2011	
64.	IHC Naeem Khan No. 912	11.03.1971	13.12.1994	10 th /MRD	20.09.2011	
65.	IHC Jehan Dad No. 1140	14.03.1971	10.04.1995	FA/MRD	20.09.2011	Reverted to the rank of Constable vide OB: No. 640 dated 02.03.2012
66.	IHC Muhammad Jehangir No. 1355	01.04.1973	20.07.1994	BA/MRD	20.09.2011	
67.	IHC Muhammad Wisal No. 781	07.04.1973	01.09.1992	10 th /SWB	20.09.2011	
68.	IHC Faiz Muhammad No. 658	02.02.1974	05.10.1994	BA/MRD	20.09.2011	
69.	IHC Ajmal Khan No. 705	17.02.1971	13.08.1991	10 th /SWB	20.09.2011	
70.	IHC Sher Muhammad No. 1088	08.03.1973	10.04.1995	10 th /MRD	20.09.2011	
71.	IHC Muhammad Ilyas No. 890	04.04.1970	24.03.1992	10 th /MRD	20.09.2011	
72.	IHC Amjid Ali No. 843	02.02.1971	29.03.1990	10 th /MRD	20.09.2011	
73.	IHC Fazal Hussain No. 116	20.08.1970	01.07.1990	10 th /SWB	20.09.2011	
74.	IHC Raza Khan No. 507	12.05.1971	01.07.1991	10 th /SWB	20.09.2011	
75.	IHC Ali Said No. 198	04.02.1976	02.04.1997	FA/SWB	20.09.2011	
76.	IHC Muhammad Naeem No. 732	12.01.1972	13.09.1991	BA/SWB	20.03.2012	
77.	IHC Mushtaq Ahmad No. 926	15.02.1977	14.11.1995	FA/MRD	20.03.2012	
78.	IHC Aurang Zeb No. 1325	13.06.1974	09.10.1994	10 th /MRD	20.03.2012	
79.	IHC Atta Ur Rehman No. 156/69	15.08.1974	26.09.1994	10 th /MRD	20.03.2012	
80.	IHC Said Ul Amin No. 196	06.05.1976	26.06.1996	10 th /SWB	20.03.2012	
81.	IHC Fayaz Ali No. 234	11.04.1978	31.12.1996	FA/MRD	20.03.2012	
82.	IHC Ali Akbar No. 881	12.02.1971	15.03.1992	FA/MRD	20.03.2012	
83.	IHC Fazal Daud No. 865	06.01.1974		FA/MRD		

APPROVED
 20/09/2011
 SAIF ULLAH
 High Court Peshawar

SAIF ULLAH
 Adv. to
 High Court Peshawar

84.	IHC Fazal Khaliq No. 354	26.12.1972	08.01.1996	FA/MRD	20.03.2012
85.	IHC Farhad Ali No. 58/SB	05.07.1974	15.11.1995	10 th /MRD	20.03.2012
86.	IHC Kameen Khan No. 264	15.02.1971	24.04.1996	BA/MRD	20.03.2012
87.	IHC Imtiaz Khan No. 1584	06.02.1975	29.02.1996	FA/MRD	20.03.2012
88.	IHC Waqif Khan No. 600	05.08.1970	06.12.1995	10 th /MRD	20.03.2012
89.	IHC Khan Muhammad No. 112	02.02.1975	28.06.1995	FA/SWB	20.03.2012
90.	IHC Farooq Hussain No. 823	03.01.1971	30.12.1989	10 th /MRD	20.03.2012
91.	IHC Qasim Khan No. 203	03.01.1976	26.06.1996	10 th /SWB	20.03.2012
92.	IHC Noorul Islam No. 1106/29	01.10.1976	04.04.1995	FA/MRD	20.03.2012
93.	IHC Javid Ahmad No. 1292	05.05.1973	29.01.1995	FA/MRD	20.03.2012
94.	IHC Anees Ahmad No. 198	07.02.1973	27.04.1995	10 th /MRD	20.03.2012
95.	IHC Saif Ul Islam No. 1054	09.02.1972	02.07.1991	FA/MRD	20.03.2012
96.	IHC Bashir Muhammad No. 96	04.06.1976	03.07.1996	10 th /MRD	20.03.2012
97.	IHC Umar Hayat No. 522	20.04.1970	10.12.1988	10 th /SWB	20.03.2012
98.	IHC Akhtar Munir No. 708	01.01.1971	13.08.1991	FA/SWB	20.03.2012
99.	IHC Irad Ali No. 248	03.04.1974	28.07.1996	10 th /MRD	20.09.2012
100.	IHC Shah Jehan No. 583	08.04.1976	19.04.1995	BA/MRD	20.09.2012
101.	IHC Gul Malik No. 572/174	02.04.1978	08.07.1998	FA/NSR	20.09.2012
102.	IHC Hamayun No. 118	15.06.1977	18.07.1998	Fsc/MRD	20.09.2012
103.	IHC Iftikhar Shah No. 717	08.03.1978	21.04.1996	10 th /MRD	20.09.2012
104.	IHC Aziz Ur Rehman No. 1588	24.08.1973	19.09.1996	FA/MRD	20.09.2012
105.	IHC Sved Saleem Nawaz No. 1059	20.04.1974	13.03.1993	FA/MRD	20.09.2012
106.	IHC Avaz Muhammad No. 46	02.02.1976	20.04.1995	10 th /SWB	20.09.2012
107.	IHC Niaz Ali No. 1287	05.02.1974	29.03.1995	10 th /MRD	20.09.2012
108.	IHC Abdul Salam No. 1307	28.01.1978	11.07.1998	FA/MRD	20.09.2012
109.	IHC Javed No. 834	12.02.1978	11.07.1998	BA/MRD	20.09.2012
110.	IHC Jehangir Khan No. 1324	25.03.1980	11.07.1998	BA/MRD	20.09.2012
111.	IHC Muhammad Zubair No. 22	28.02.1977	25.06.1999	10 th /SWB	20.09.2012
112.	IHC Parwar Ali No. 261	12.02.1974	24.09.1998	FA/MRD	20.09.2012
113.	IHC Shah Hussain No. 651	12.04.1971	04.07.1991	10 th /SWB	20.09.2012
114.	IHC Shahi Mulk No. 394	01.04.1973	15.06.1994	10 th /SWB	20.09.2012
115.	IHC Imran Ali No. 1615	10.01.1978	28.01.1978	FA/MRD	20.09.2012
116.	IHC Janab Ali No. 553	24.01.1979	20.10.1998	BA/SWB	20.03.2013
117.	IHC Zulfikar Ali No. 1019	07.07.1979	27.07.1999	BA/MRD	20.03.2013
118.	IHC Shahab No. 418				
119.	IHC Niaz Muhammad No. 720	13.05.1974	29.07.1998	BA/SWB	20.03.2013
120.	IHC Muhammad Zahir No. 1152	05.02.1976	31.07.1995	BA/MRD	20.03.2013
121.	IHC Ghaffar Ali No. 785	10.04.1975	27.04.1995	FA/SWB	20.03.2013
122.	IHC Subhan Ullah No. 365	05.03.1974	11.07.1998	10 th /SWB	20.03.2013
123.	IHC Farooq No. 78	01.01.1980	25.04.1998	FA/SWB	20.03.2013
124.	IHC Noor Muhammad No. 1489	04.05.1976	11.01.1995	10 th /MRD	20.03.2013
125.	IHC Gul Bahadur No. 1033	01.04.1972	25.03.1991	10 th /MRD	20.03.2013
126.	IHC Fawad Ali No. 1167	03.04.1976	24.10.1998	10 th /MRD	20.03.2013
127.	IHC Faqeer Ahmad No. 207	05.04.1973	01.12.1991	10 th /MRD/SWB	20.03.2013
128.	IHC Sabir Khan No. 1266	15.01.1978	15.12.1996	10 th /MRD	20.03.2013
129.	IHC Bakht Zada No. 56	05.02.1974	21.04.1996	BA/MRD	20.03.2013
130.	IHC Muhammad Tahir No. 408	02.02.1979	11.07.1998	FA/MRD	20.03.2013
131.	IHC ...				

61


SAIF ULLAH
 Advocate
 High Court Peshawar

23/11

132.	IHC Fakhre Alam No. 590	10.04.1977	26.01.1999	BA/MRD	20.03.2013	
✓ 133.	IHC Wajid Ali No. 626	03.07.1979	05.05.1999	FA/MRD	20.03.2013	
134.	IHC Shah Jehan No. 186	01.03.1978	02.11.1999	FA/MRD	20.03.2013	
✓ 135.	IHC Niaz Muhammad No. 652	13.04.1976	31.07.1998	FA/MRD	20.03.2013	
✓ 136.	IHC Mudassir Khan No. 447	03.06.1977	20.07.1998	FA/MRD	20.03.2013	
✓ 137.	IHC Basar No. 1237	19.03.1973	19.12.1994	FA/MRD	20.03.2013	Restored to his original rank of IHC vide this office order endorsement No. 3990-91/ES dated 12.09.2013
138.	IHC Iftikhar Ahmad No. 891	01.02.1978	21.04.1996	FA/MRD	20.03.2013	
139.	IHC Rab Nawaz No. 381	10.04.1977	17.07.1995	FA/SWB	20.03.2013	
140.	IHC Jehangir Khan No. 415	01.12.1970	01.07.1991	FA/SWB	20.03.2013	
141.	IHC Rashid Ali No. 96	10.03.1973	13.04.1992	FA/MRD	20.03.2013	
142.	IHC Intizar Ali No. 237	01.02.1976	05.12.1994	FA/SWB	20.03.2013	
				FA/MRD	20.03.2013	

20

No. 469-761ES

Dated Mardan the 22/11 2014.

(Signature)
 (MUHAMMAD SAEED)PSP
 Deputy Inspector General of Police,
 Mardan Region-I, Mardan.

Copy of above is forwarded for information and necessary action.

1. All DPOs of Mardan Region.
2. All SPs Investigation of Mardan Region.

They are requested to please inform all officers serving under their command. Any officer who have objection on his seniority/ correction, he should submit his representation within 15 days after the issue of the list otherwise no representation will be accepted.

(Signature)
 E. I. O. A. I.
 F. O. M. I. A. D. I.
 Capt.
(Signature)
 P. I. A. V.

644
25/11/14

(Signature)
 SAIF ULLAH
 Advocate
 High Court Peshawar

(2) Amnet (F)

Police Training College, Hangu



Estbd: 1935

Detail Marks Certificate / History Sheet

Starting Date	: 01.04.2011	Ending Date	: 20.09.2011
College Course	: Intermediate	Name	: Shahmshah
Father Name	: Fazal Rehman	CNIC No.	: 16202-2861483-5
Rank	: HC	Belt No.	: 605
Domicile Distt.	: Swabi	Enlist: District/Unit	: Swabi
Blood Group	: B1	D.O.B	: 30.03.1977
Comp#	: 777	Education	: F.A
Company	: Khurshid Shaheed	Merit	: 24
Contact No.	: 0301-8348975	Squad	: E

LAW			DRILL			REMARKS
PPC	76	/100	Parade	9.67	/15	Declared as Passed
CrPC/QS	72	/100	PI	14.33	/20	
USL	73	/100	FC	32	/50	
PR	84	/100	MD	27.33	/40	
IST	43	/50	DPA	32.67	/50	
MJ	70	/100	Assault Fire	150	/150	
SA	68	/100	Sniper Fire	88	/100	
PPWT	61	/100	Raid on P.O.	11.33	/15	
PPWP	61	/100	Ambush	10.67	/15	
FPI	31	/40	Naka Bandi	11.33	/15	
AC	22	/30	Total Drill	387.33	/470	
FPP	21.33	/30				
PCF	45.33	/50				
Total Law	718.16	/1000				

Gr Total: 1105.49 / 1170

Overall Percentage: 75.20

Leave availed: Nil Medical Rest: Nil Absence: Nil Punishment: Nil Reward: Nil


 Commandant,
 Police Training College, Hangu

SAIF ULLAH
 Advocate
 High Court Peshawar

SAIF ULLAH
 Advocate
 High Court Peshawar

(22)

CERTIFICATE OF PROFICIENCY

N.W.F.P. POLICE

Certified that Shahin Shah Khan Constable
No. 605 (Swarabi District) of N.W.F.

Province Police, has passed the examination prescribed for
Proficients and is fit to conduct the duties of that office.

No. 10957-72/PSL

Date 17.7.2000

Saif Ullah - B
Deputy Superintendent of Police
Finger Print Bureau,
Crime Branch, N.W.F.P., Peshawar.
N.W.F.P. Peshawar

Saif Ullah
SAIF ULLAH
Advocate
High Court Peshawar

W A K A L A T N A M A

BEFORE THE COURT OF Service Tribunal K.PK Peshawar.

No. _____ of 2014

Shahenshah Head constable. (Accused/Petitioner)
(Appellant)

VERSUS

Inspector General of Police KPR. (Respondent)
and others.

I/We Shahenshah Head constable.

In the above noted Appeal. do hereby appoint

and constitute **Mr. Khan Akbar Khan and Mr. Saif Ullah Mohmand**

Advocates as my/ our Counsels in the subject proceedings and authorize them to appear, plead etc compromise, withdraw or refer the matter for arbitration for me/ us without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel at my/our expense and receive all sums and amounts payable to me/ us and to all such acts which he may deem necessary for protecting my/ our interest in the matter. They are also authorized to file Appeal, Revision, Application for restoration or application for setting asiding exparte decree proceedings on my/ our behalf.

Dated: - / /2014

K. Akbar Khan

(KHAN AKBAR KHAN)

Cell No. 0344-9111911

Saif Ullah Mohmand

Advocates High Courts
Peshawar.

Cell No. 0321-9117280

Office Address: - B-107, 2nd floor, Town Tower
Jahangir Abad, University Road,
Peshawar.

[Signature]

(Client)

[Handwritten initials]