

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	14.07.2021	<p style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, <u>PESHAWAR.</u></p> <p style="text-align: center;">Service Appeal No. <u>5701/2021</u></p> <p>Mr. Sher Zada Naib Qasid, office of the S.P Investigation District Buner. ... (Appellant)</p> <p style="text-align: center;"><u>Versus</u></p> <p>1. The Provincial Police Officer, KPK, Peshawar and others. ... (Respondents)</p> <p>Appellant with counsel present. Preliminary arguments heard and record perused.</p> <p>2. This appeal was received on 08.02.2019 and was returned with office objection for completion and resubmission within 15 days. Among nine objections, two objections at S.No. 5 and 9 were removed and the other objections were not removed with the explanation of their being beyond control of the appellant. When resubmitted without removal of objections, the appeal was again returned on 05.07.2019. Then, the appellant remained inactive for a long time and the appeal was again re-submitted by different counsel i.e. Mr. Ashraf Ali Khattak, Advocate, replacing the previous memorandum of appeal.</p> <p>3. When learned counsel for the appellant confronted with the position noted above and asked as to why the objections</p>

Ashraf Ali Khattak
cel

were not removed; and why the appellant remained inactive for a long time, he was unable to give any rational answer, though he tried to hang on with unwarranted arguments. Therefore, this appeal is dismissed in limine. File be consigned to the record room.


(AHMAD SULTAN TAREEN)
Chairman

ANNOUNCED

14.07.2021

The appeal of Mr. Sher Zada Naib Qasid SP Investigation District upper Dir received today i.e. on 08.02.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Addresses of respondent no. 4 to 20 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexures of the appeal are illegible which may be replaced by legible/better one. *better copies of 2/12*
- 3- Copy of seniority list mentioned in para-para-2 (Annexure-A) and recommendation for promotion para-5 (Annexure-D) are not attached with the appeal which may be placed on it. *It is not a seniority list but letter*
- 4- Copy of impugned order and departmental appeal against it are not attached with the appeal which may be placed on it.
- 5- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 6- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 7- Memorandum of appeal may be got signed by the appellant.
- 8- Annexures of the appeal may be attested.
- 9- 22 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 233 /S.T.

Dt. 11-2 /2019.

[Signature]
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Israr Ahmad Adv.
District Court Daggar Buner.

*objection No. 5, 8 & 9 are removed
while objection No. 1, 2, 3, 4, 6
& 7 & 8 are beyond the
control of petitioner*

*objection No. 1, 2, 3, 4, 6 & 7 / Israr Ahmad
Advocate
are still stand, therefore the appeal is held again
returned to the counsel for the appellant for completion
and resubmitted within 15 days.*

No. 1175

Date. 5-7-2019

[Signature]
5/7/19

All objections are removed however legal copies are not available to appellants. So

please may put in before the ho'sble tribunal

15/11/19

objections no. 1, 2, 3, 4, 6 & 8 still stand. therefore the appeal in hand is returned again to the court for the appellant for completion and resubmitted within 15 days.

no 1272 /ST

dt. 26-7-2019

18/7/19

7 days further extended

22/10/19

removed all objections

Sir, objection removed and resubmitted

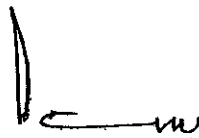

27/5/2021

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 5701 /2021

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	27.05.2020	<p>The present appeal was submitted on 08/02/2019 by Mr. Israr Ahmad Advocate. So many times the appeal was returned to the learned counsel for its completion but every time appeal was resubmitted incomplete, lastly the same was returned on 22.10.2019 giving 10 days time for completion of the appeal. Today i.e on 27.5.2021 present appeal was resubmitted by Mr. Ashraf Ali Khattak Advocate changing the previous memorandum of appeal, moreover, the appeal is also submitted late by 572 days. The same may be entered in the institution register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on 14/07/2021</p> <p style="text-align: right;"> CHAIRMAN</p>
2	03/06/21	

**BEFOR THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

SERVICE APPEAL No. ____/2019

Sher Zada N/Qasid,
Office of the S.P Investigation, Bunir..... Appellant

Versus

The Provincial Police officer KPK Peshawar
and others Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Service Appeal with Affidavit			1- 6
2.	Copy of Educational Certified Certificate		A	7- 8
3.	Copy of letter No.1896-915 dated 4-5-2010, signal message dated 27-7-2010 the office of Inspector General of Police Khyber Pakhtunkhwa		B	9- 10
4.	Copy of list/details of vacant posts		C	11- 12
5.	copy of signal dated 26-7-2010		D	13-
6.	Copy of Notification dated 4-2-2009 whereby 33% promotion quota has been reserved for N/Qasid/Daftaries who has two years service at their credit as such and are matriculate.		E	14- 16
7.	Copy of Promotion Orders of private respondents		F	17- 20
8.	Copy of appeal and order of this Hon'ble Tribunal dated		G	21- 30

S.No.	Description of Documents	Date	Annexure	Pages
	4-7-2018			
9.	Copy of departmental appeal dated 1-8-2018		H	31-
10.	Copy of seniority list		I	32-37
11.	Wakalat Nama.			38

~~#~~
Petitioner

Through

Ashraf Ali Khattak
Ashraf Ali Khattak
Advocate,
High Court, Peshawar

Dated ___ / ___ / 2019

D

**BEFOR THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

SERVICE APPEAL No. 5701 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 619

SHER ZADA N/QASID OFFICE OF

THE S.P INVESTIGATION DISTT BUNER..... Appellant

Dated 08/02/2019

Versus

1. The Provincial Police officer KPK Peshawar.
2. The Regional Police officer Malakand at Mingora.
3. The District Poilice officer Buner.
4. Asghar Alam J/Clerk Special Branch Swat through DPO Swat.
5. Sanauallah J/Clerk of FRP/Headquarter Malakand Division through DPO Swat.
6. Fazl-e-Zaman J/Clerk office of DIG Kohat through DPO Kohat.
7. Ahmad Ali J/Clerk Investigation Branch through DPO Mardan.
8. Irfanullah J/Clerk office of DIG Kohat through DPO Kohat.
9. Haider Ali, J/Clerk investigation Branch Mardan through DPO Mardan.
10. Adil Khan J/Clerk office of DIG Hazara through DPO Abbottabad.
11. Muhammad Kamran office of DPO D.I.Khan through DPO D.I.Khan.
12. S. Bakht Baidar Shah J/Clerk RTW Mansehra through Comdt: Police Training Center Mansehra.
13. Irfanullah J/Clerk office of DIG Kohat through DPO Kohat.
14. Qaiser Farooq J/Clerk office of DPO Abbottabad through DPO Abbottabad.
15. Sharafat Khan J/Clerk office of S.P Investigation Battagram through DPO Battagram.
16. Ahmad Ali J/Clerk office of SP Investigation Mardan through DPO Mardan.
17. M. Adil J/Clerk Spl: Branch Hazara through DPO Abbottabad.
18. Muhammad Javed J/Clerk office of DIG Bannu through DPO Bannu.
19. Shaukat Ali J/Clerk office of DPO Swabi through DPO Sswabi.

Filed to-day

Registrar

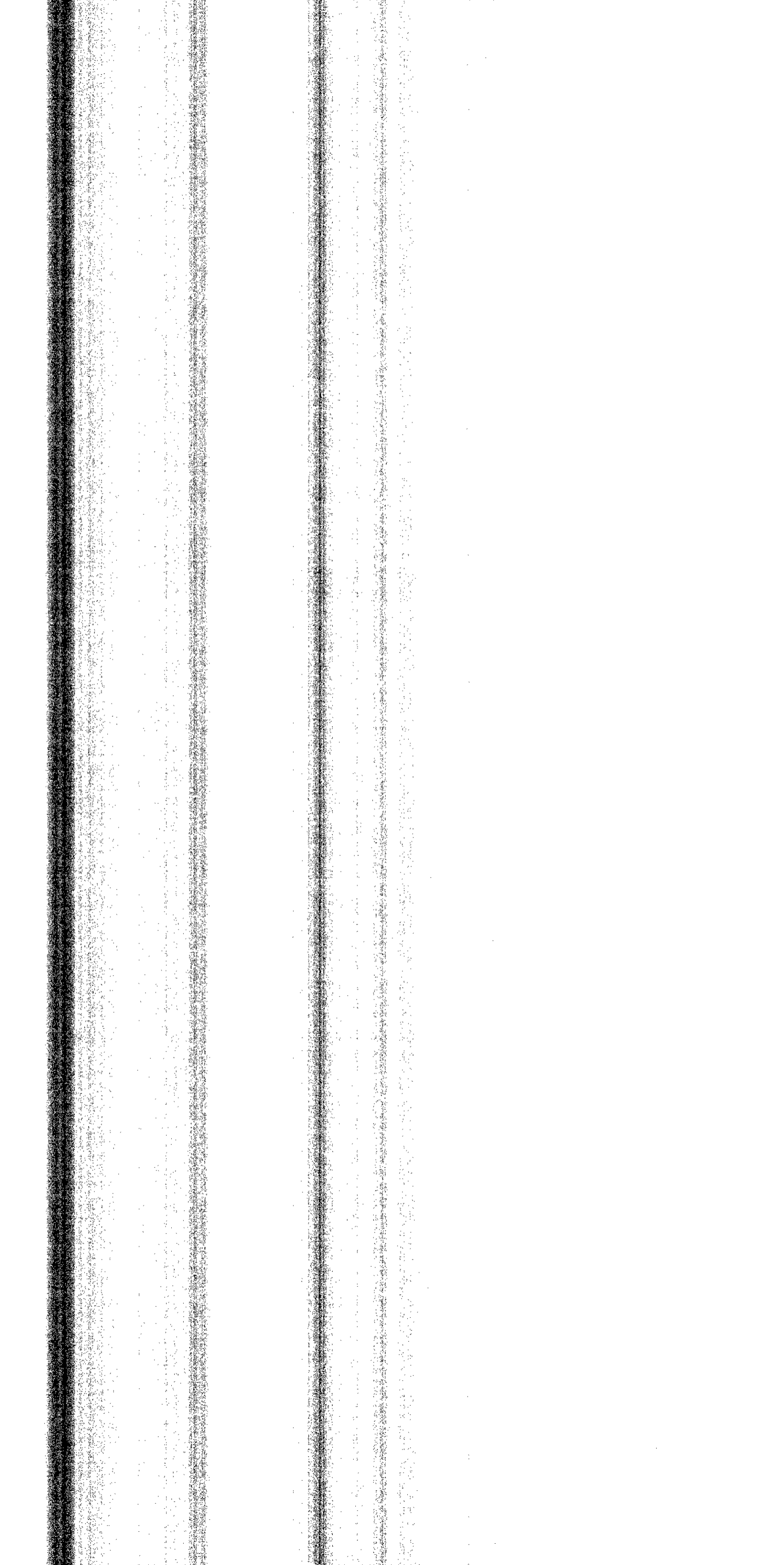
8/2/2019

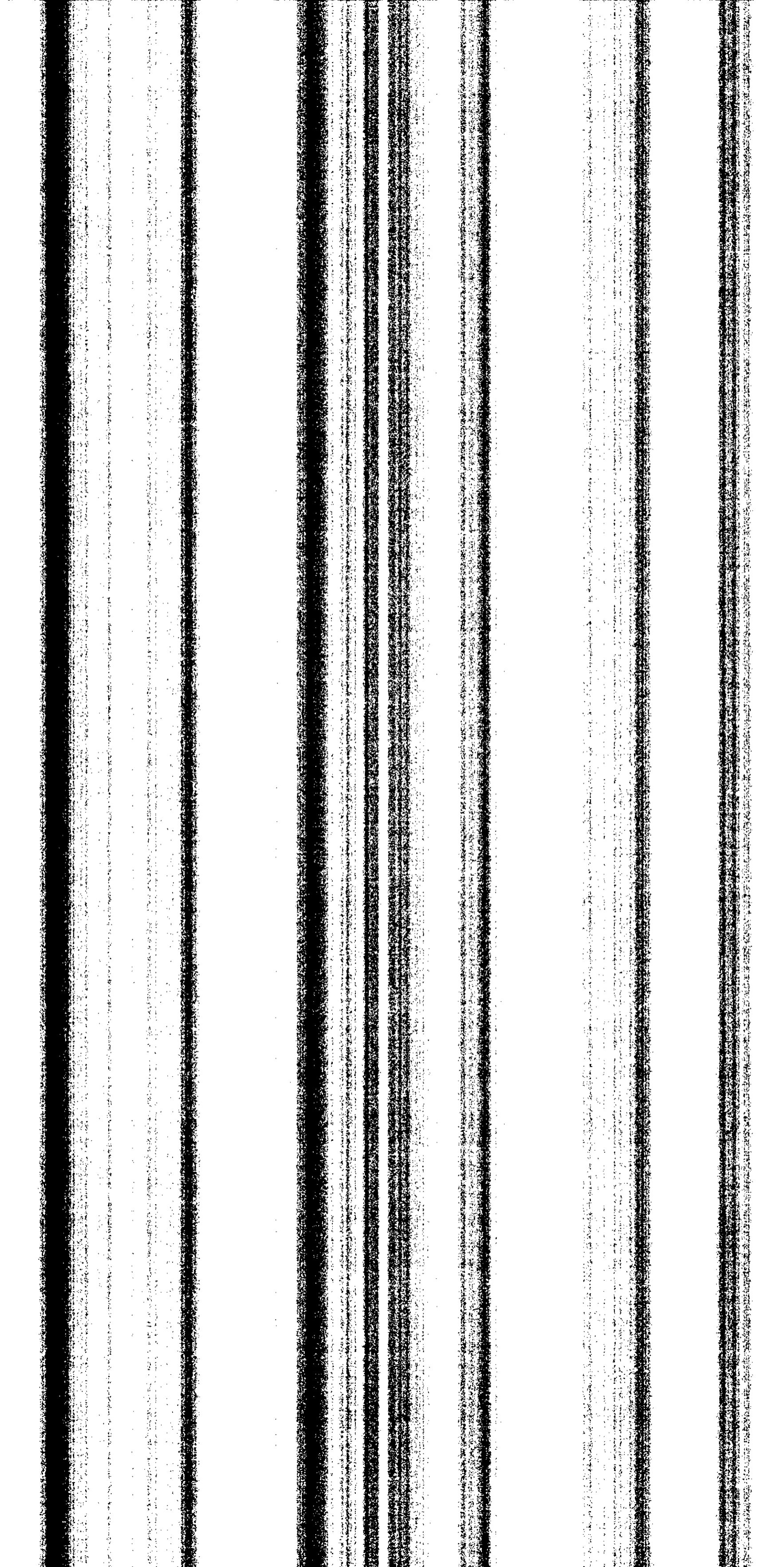
Re-submitted to -day
and filed.

..... Respondents

Registrar

27/5/2021





Service Appeal under Section of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the impugned order dated 3-8-2010 and 25-8-2010 wherein some junior N/Qasids and Daftaries from the appellant were promoted to the post of J/Clerks on the strength of 33% quota reserved for promotion of N/Qasids/Daftaries etc and against which appellant filed departmental appeal as per order/direction of this Hon'ble Tribunal in Service Appeal No.1195/2011 dated 4-7-2018 but the same was not responded within the statutory period of 90 days.

Respectfully Sheweth,

The concise facts giving rise to the present Service Appeal are as under:-

1. That the appellant is the employee of Distt Police Force and presently serving as N/Qasid in the Office of SP Investigation, Buner. He is qualified up to FA (Annex-A) He has long standing service at his credit with unblemished and clean sheeted conduct record.
2. That vide letter No.1896-915 dated 4-5-2010, signal message dated 22-7-2010 the office of Inspector General of Police Khyber Pakhtunkhwa directed CCP, Comdt: FRP, officers of CPO Peshawar and all DPOs to submit list/detail of those N/Qasids/Daftaries who are matriculate with two years service at their credit as such so as to process their cases for promotion to the post of J/Clerk under the 33% reserved quota.(Annex-B).
3. That number of posts were lying vacant under the reserve quota of 33 % and whereas five vacant posts were lying in the office of SP Investigation Buner and whereas four vacant posts were in the office of DPO Buner. Presently three posts of J/Clerks B-11 are lying vacant in Distt Buner. (The details of vacant posts are attached as Annex-C).
4. That at the relevant time office of the DPO Buner submitted and recommended three names of n/Qasids/Daftaries including the

appellant for processing their promotion to the post of J/Clerk under the reserved quota. Appellant lies at S.No.1 of the list. (copy of signal dated 26-7-2010 is attached as Annex-D).

5. That as per notification dated 4-2-2009 (Annex-E) 33% promotion quota has been reserved for N/Qasid/Daftaries who has two years service at their credit as such and are matriculate.
6. That as per rules promotion from the post of N/Qasid/Daftaries to the post of J/Clerk shall have been made on seniority-cum-fitness basis and there is no provision regarding any test/exam to be conducted.
7. That in all sister departments promotion under reserved 33% quota have/had been materialized on the basis of seniority -cum fitness basis without any test or exam whatsoever.
8. That the respondent in order to accommodate their own blue eyed chip conducted test/exam in violation of the relevant policy. They by their own initiative granted marks to their own blued eyes and made the appellant low in merit and resultantly promoted the private respondents who are junior to the appellant.(Copy of the appointment/promotion orders of private respondents are attached as Annex-F).
9. That being aggrieved from the impugned orders of promotion appellant filed departmental appeal and then service appeal No.1195/2011 before this Hon'ble Tribunal which was disposed of vide order dated 4-7-2018 with observation/direction to move departmental appeal before the competent authority and in case the grievances are not redressed appellant would be at liberty to invoke the jurisdiction of this Hon'ble Tribunal again.(copy of order of this Hon'ble Tribunal dated 4-7-2018 at attached as Annex-G).
10. Tjhat appellant in the light of the order dated 4-7-2018 of this Hon'ble Tribunal preferred departmental appeal on 1-8-2018 (Annexure-H) which is still pending without disposal; hence statutory period has been elapsed therefore the instant service appeal inter-alia on the following grounds:-

4

GROUNDS

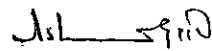
- A. That the respondents has not treated the appellant in accordance with law, rules and policy and acted in violation of Article 3, 4 and 10(A) of the Constitution of Islamic Republic of Pakistan 1973. Appellant was entitled for promotion to the post of J/Clerk under the 33% reserved, quota of N/Qasids and daftaries but he was not promoted which is illegal, unlawful and without lawful authority therefore this Hon'ble Tribunal has got jurisdiction to direct the respondents to consider the promotion of appellants to the post of J/Clerk as per spirit of policy under the reserved quota.
- B. That appellant has highly been discriminated all the private respondents are junior to the appellant as evident from the seniority list (Annex-I), but they have been promoted which is the violation of Article 25 and 27 of the Constitution of Pakistan 1973.
- C. That the relevant promotion policy for N/Qasid/daftaries to the post of J/Clerk nowhere provides the conduction of any test or exam. Official respondents conducted so called exam in order to accommodate their blued eyes which is against the relevant policy.
- D. That in all sister departments promotion from the post of N/Qasid/Daftaries to the post of J/Clerks under the reserved 33% quota are made on the basis of seniority-cum-fitness basis. The introduction of test by the respondent department is/was malafide on the part of official respondents and was actualize only to deprived the seniors from the their legitimate right of promotion.
- E. That appellant would like to seek the permission of this Hon'ble Tribunal to advance further grounds at the time of hearing.

It is therefore, humbly prayed that on acceptance of this service appeal, this Hon'ble Tribunal may be pleased to:-

- (i) Declare the test/exam conducted by the respondents for promotion to the post of J/Clerk under the 33% quota reserved for promotion of N/Qasids/Dataries etc as illegal , unlawful, without lawful authority and against the spirit and provision of the reserved quota policy.
- (ii) Direct the respondents to convene departmental promotion committee meeting forthwith and consider the promotion of appellant to the post of J/Clerk as per sprit and provision of 33 % reserved quota and promote him accordingly with effect from the date when vacancy in his cadre was available to which appellant was eligible.
- (iii) Any other relief as deemed appropriate in the circumstances of case not specifically asked for may also be granted to petitioners.

Through


Appellant


Ashraf Ali Khattak
Advocate,
High Court, Peshawar

Dated: ___/___/2019

6

**BEFOR THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

SERVICE APPEAL No. ____/2019

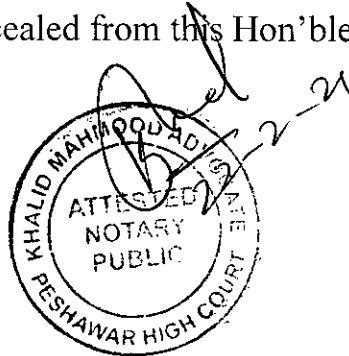
**SHER ZADA N/QASID OFFICE OF
THE S.P INVESTIGATION DISTT BUNER..... Appellant**

Versus

**The Provincial Police officer KPK Peshawar
and othersRespondents**

AFFIDAVIT

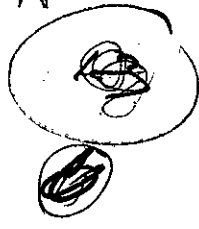
I, Sher Zada S/o Darvish N/Qasid Office of the SP Investigation Branch, Bunir , do hereby solemnly affirm and declare on oath that the contents of this service appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.




Deponent

Annex - A

~~ANNEX~~



7

DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in North - West Frontier Province having been born & settled in this Province.

I was born at Village - Mohallah Mahabat Mirpur Kanpur

Tehsil Daggard District Swat

Signature of the applicant
Dated

25/7/90

Pursuance to declaration filed by Mr - Ms Shurzada Son / Daughter of Darwish domiciled in North West Frontier Province; it is hereby certified that the said Shurzada is born of parents who are permanent residents the North - West Frontier Province having been born - settled within it.

T.H. Daggard

I have satisfied myself from my personal knowledge - verification that the above declaration is true and certify accordingly.

This 25th day of July 1990

Verified

[Signature]
25/7/90

No 281/EA/C/B
25-7-90



MAGISTRATE 1ST CLASS

Name: Hussain Zafar Khan



COUNTERSIGNED.

[Signature]
DISTRICT MAGISTRATE SWAT:

Name Dalqur-Rohman

Strike off which ever is not applicable

No. S245/AE-4

23/8/90

[Signature]

میں مسلمانانہ طور پر چھوڑنے کو نسل کے کراہیم
تصریق کرتا ہوں کہ یہ مسلمان شہریت اور ولد در رویش
نہیں کراہیم کہ اسے طور پر جاننا سود کے موضح کراہیم
ع اعلیٰ سیکرٹری کارڈ

22/7/10

Verified as above.

25/7/10

Deputy Commissioner
Sub Division
A.T.C. Swat District

Domicile Certificate

I Declare that I was born of parents who are permanently domiciled to North- West Frontier Province having been born settled in is Province.

I was born at Village – Mohallah Mahbat Khel Karapa, Tehsil Baggar District Swat.

- Signature of the applicant
Dated

Pursuance to declaration dated 25.04.1990 filed by Mr-Ms Sherzada Son /Daughter of Darwesh domiciled in North- West Frontier Province having been born – settled within it.

I have satisfied myself from my personal knowledge – verification that the above declaration is true and certify accordingly.

This 25th day of July 1990

MAGISTRATE 1ST CLASS

Name:

COUNTERSIGNED

District Magistrate, Swat
Name

Strike off when ever is not applicable.

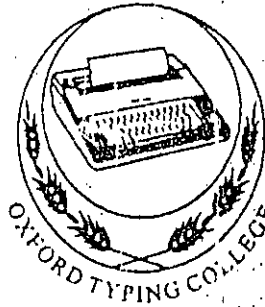
Atc
[Signature]

Reg No CC/07/58

Serial No 58

OXFORD TYPING COLLEGE

13



Daggar Sawari Distt: Buner.

CERTIFICATE

This is to certify that Mr/Miss HER ZADA

Son/Daughter of DARVESH A

Residence of VILLAGE KARAPA TEHSIL DAGGAR DISTRICT BUNER

has successfully completed THREE (3) months typing training

course in this institute in THIRTY FIVE (35) WORD PER MINUTE

from 03-06-2008 to 03-09-2008

wishing him good luck & success in his future life.

Dated 0-09-2008



This certificate is issued without alteration or erasure

Handwritten signature

P (SA)

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

SAIDU SHARIF, SWAT.

PROVISIONAL & DETAILED MARKS CERTIFICATE
INTERMEDIATE (ANNUAL) EXAMINATION, 2014
HUMANITIES (Part-II)

THIS IS TO CERTIFY THAT SHERZADA Roll No: 73160
 Son / Daughter of DARVESH Reg: No 28006-B/P1 T-3012

and a candidate of DISTRICT BUNER
 has secured the marks shown against each subject in the INTERMEDIATE EXAMINATION
 of the Board of Intermediate & Secondary Education Saidu Sharif. Swat held in the
 month of April as Private

Subjects	Marks	Marks Obtained						Marks in Words
		Part-I		Part-II		Total		
		Theory	Pract	Theory	Pract			
English	200	42	--	45	--	87	Eighty-Seven	
Urdu	200	39	--	43	--	82	Eighty-Two	
Islamic Education	50	19	--	--	--	19	Nineteen	
Pakistan Studies	50	--	--	28	--	28	Twenty-Eight	
Islamic History	200	72	--	34	--	106	One Hundred Six	
Islamic Studies	200	33	--	56	--	89	Eighty-Nine	
Pashto	200	39	--	41	--	80	Eighty Only	
Total : 1100							491-D	Four Hundred Ninety-One Only
Remarks :								

Prepared by Computer Cell
 BISE Saidu Sharif Swat
 Result Declaration Date: 23 July, 2014
 Note: All admissions are subject to subsequent rectification.

(Signature)
 Controller of Examinations
 BISE Saidu Sharif Swat

AK by *(Signature)*

ANNEX (B)

25

9



6-52

The Capital City Police Officer
Peshawar,
Khyber Pakhtunkhwa

All Commandants in Khyber Pakhtunkhwa

All Officers of CPO, Peshawar

The Commandant CPO University Campus

1896-015 dated Peshawar the 04/15

Subject: PROMOTION

Names of Daftari, N/Qa-ids, Clerk, Two
years service appear matriculate and above and
to be submitted to this office within
date be fixed for test/interview

Handwritten signature

QUDRATULLAH KHAN
DIG/Headquarter
For Provincial Police Officer
Khyber Pakhtunkhwa

3- P.L/SB

5- 20/0

Copies To

all DPOs & i/e J. No. 1/2010

for in the name of
which compliance is
your will in 5 days
positively

Handwritten signature

Handwritten signature

Handwritten signature

درون نامہ 10/15 و 10/15
میں سے تعلق رکھنے والے
پولیس افسران کو مطلع کیا گیا ہے

Handwritten signature

90

The Capital Police Officer,
Peshawar, Khyber Pakhtunkhwa
All Commandants in Khyber Pakhtunkhwa
All Officers of CPO, Peshawar
The Commandant CPO University Campus
1896-915 dated Peshawar the 04.05.....

Subject: PROMOTION

Names of Daftari, N/ Qasid and Clerk Two years
service appear matriculatory above and Year will
be submitted to this office within date be fixed
for last/interview.

QUDRATULLAH KHAN
DIG / Headquarter
For Provincial Police Officer
Khyber Pakhtunkhwa

Abd
R

no. 3
2/17

Police PESH 21330/120

TO ALL DISC / ALL D/OS / ALL I/E INTERESTING KPK
 N 17994-18060/E-III D/21-2-10 @ SUB @ ABSORPTION
 PROMOTION AS J/CHIEF @ IN COM CONTINUATION OF
 OFFICE NO 11896-915/E-III D/4-5-10 @ ALL
 CANDIDATES IE DAFIARI, NAIB QASID AND
 S-IV ETC WHO HAVE APPLIED FOR PROMOTION
 TO 4S RANK OF J/CHIEF, AND HAVE COMPLETED 2
 YEARS SERVICE ON 28-7-10 MAY BE DIRECTED
 TO REPORT AT 8:00 HRS ON 28-7-10
 THEY WILL APPEAR IN THE TEST AFTER OBT-
 AING PERMISSION FROM THE COMPETENT
 AUTHORITY @ INDIVIDUAL WHO DO NOT FULL
 FIL THE REQUIRED CONDITION SHOULD NOT
 BE ALLOWED



211515
 H. H. H. H. H.

EC

For n/action and
 inform both the C-IV
 of this office

[Signature]
 SP/Investigation Buner

[Signature]
 12/10/21

[Signature]

10

Better Copy

Page # 10

INI 2/2117

POLICE PESHAWAR 211330/120

AU-DISH/ALL DPOS/ALL I/C INSPECTOR KPK
17994-18060/E-III D/21-7-7-10 O SUBO
ABSORPTION MOTION AS J/CLERK O IN
CONTINUATION OF OFFICE NO 11896-915/E-III
2/4-5-10 O ALL CANDIDATES I.E DAFTARI , NAIB
QASID AND C-IV ETC. WHO HAVE APPLIED FOR
PROMOTION RANK OF J/CLERK, AND HAVE
COMPLETED 2 SERVICE ON 28-7-1- MAY BE
DIRECTED REPORT AT CPO AT 0800 HAS ON
28.07.10. THEY WILL APPEAR IN THE TEST AFTER
OBTAINING PERMISSION FROM THE
COMPETENT AUTHORITY O INDIVIDUAL WHO
DO NOT FULL THE REQUIRED CONDITION
SHOULD NOT BE ACCORDED

211515
CH2695

EC _____

For n/action and
inform both the C-IV
of this office

Abel
R

**STATEMENT SHOWING DISTRIBUTION OF SANCTIONED STRENGTH OF K.P.K POLICE (INVESTIGATION)
FOR EXECUTIVE & MINISTERIAL STAFF AS ON 01.07.2010**

Districts/Units	Addl: IGP 21	DIG 20	SP 18	SP/Research 18	DSP 17	DSP/Legal 17	Inspector 16	Inspector/Legal 16	Sis 14	ASIs 09	HC 07	Driver HC 07	Constable 05	Driver Const: 05	Total	Office Supdt: 16	S/Grapher 15	Asstt: Grade Clerk 14	S/Typist 12	S/Clerk 09	J/Clerk 07	Daftari 02	N/Qasid 01	Barber 01	Washor.man 01	Sweeper 01	Chowkidar 01	Behishti 01	W/Carrier 01	Total	G.Total
Addl: IGP/Investigation	1	4	2	1	7	1	21	1	47	39	50	1	119	7	301	1	2	5	1	9	11	0	8	0	0	1	0	2	0	40	341
CCPO, Peshawar	0	0	0	0	0	0	8	0	29	35	54	0	98	14	238	0	0	1	1	4	6	0	2	0	0	1	0	0	0	15	253
SP/Charsadda	0	0	1	0	0	0	7	0	19	29	52	0	106	0	214	0	0	1	1	3	7	0	4	0	0	3	1	1	0	21	235
SP/Nowshera	0	0	1	0	0	0	7	0	16	27	46	0	88	0	185	0	0	1	1	3	5	0	4	0	0	3	1	1	0	19	204
SP/Mardan	0	0	1	0	0	0	8	0	22	35	59	0	112	0	237	0	0	1	1	4	7	0	5	0	0	4	1	4	0	27	264
SP/Swabi	0	0	1	0	0	0	5	0	11	20	32	0	68	0	137	0	0	0	1	3	6	0	4	0	0	2	1	1	0	18	155
SP/Kohat	0	0	1	0	0	0	3	0	9	19	27	0	61	0	120	0	0	1	1	3	6	0	4	0	0	4	1	4	0	24	144
SP/Hangu	0	0	1	0	0	0	4	0	6	11	16	0	32	0	70	0	0	0	0	2	3	0	1	0	0	1	0	0	1	8	78
SP/Karak	0	0	1	0	0	0	2	0	9	10	13	0	45	0	80	0	0	0	1	2	5	0	4	0	0	2	1	3	0	18	98
SP/Bannu	0	0	1	0	0	0	5	0	14	19	36	0	83	0	158	0	0	1	1	5	7	0	4	0	0	4	1	4	0	27	185
SP/Attock	0	0	1	0	0	0	3	0	7	13	19	0	45	0	88	0	0	0	0	3	5	0	2	0	0	3	1	3	0	17	105
SP/Jhelum	0	0	1	0	0	0	5	0	13	17	33	0	84	0	153	0	0	1	1	5	7	0	3	0	0	6	1	4	0	28	131
SP/Sialkot	0	0	1	0	0	0	3	0	4	5	11	0	26	0	50	0	0	0	0	2	5	0	1	0	0	2	1	1	0	12	62
SP/Rawalpindi	0	0	1	0	0	0	5	0	14	26	37	0	84	0	167	0	0	1	1	4	7	0	3	0	0	3	1	3	0	23	190
SP/Sheikhpura	0	0	1	0	0	0	5	0	12	31	29	0	81	0	159	0	0	1	1	3	6	0	3	0	0	1	1	2	0	18	177
SP/Hazipur	0	0	1	0	0	0	4	0	10	18	28	0	64	0	125	0	0	1	1	3	6	0	2	0	0	2	1	2	0	18	143
SP/Battagram	0	0	1	0	0	0	3	0	6	7	12	0	30	0	59	0	0	0	1	2	3	0	1	0	0	1	1	1	0	10	69
SP/Kohistan	0	0	1	0	0	0	3	0	11	12	11	0	44	0	82	0	0	0	1	2	4	0	3	0	0	1	0	1	1	13	95
SP/Swat	0	0	1	0	0	0	8	0	24	44	69	0	217	0	363	0	0	1	1	4	7	0	3	1	4	5	1	3	0	30	393
SP/Shangla	0	0	1	0	0	0	3	0	6	10	21	0	50	0	91	0	0	0	1	2	3	0	1	0	1	2	1	1	0	12	103
SP/Buner	0	0	1	0	0	0	4	0	13	24	46	0	116	0	204	0	0	0	0	3	5	0	3	1	1	3	1	2	0	19	223
SP/Dir Lower	0	0	1	0	0	0	6	0	12	37	41	0	119	0	216	0	0	1	0	2	5	0	2	1	2	3	1	2	0	19	235
SP/Dir Upper	0	0	1	0	0	0	4	0	9	22	31	0	89	0	156	0	0	0	0	2	3	0	1	0	1	2	1	2	0	12	168
SP/Chitral	0	0	1	0	0	0	3	0	11	14	18	0	63	0	110	0	0	1	0	2	5	0	2	0	1	2	1	2	0	15	126
Total:-	1	4	24	1	7	1	129	1	334	524	791	1	1924	21	3763	1	2	18	17	77	134	0	70	3	10	61	20	49	2	454	4227

Amex-C 11
Amid

[Handwritten signature]

12

From: The Superintendent of Police,
 Investigation, Buner

To: The Assistant Inspector General of Police,
 Detachment, Mhyber Pakhtunkhwa
 Rawalpindi

No. 467 /M, dated Dargar the 28 / 01 / 2021

Subject: REGION/UNIT WISE VACANCY POSITION OF
 MINISTERIAL STAFF.

Memo:-

Kindly refer to office' Signal: No.268-80/E-V, dated
 26.01.2021.

The requisite information is submitted on the prescribed
 Proforma as desired, please.

Sanction Present Shortfall	Office Superintendent EPS-17	Assistant EPS-16	Qualitative Analyst BS- 16	Quantitative Analyst BS- 16	Stenographer BS-16	Computer Operator BS- 16	Assistant Programmer/LAN BS-16	Senior Clerk BS-14	Junior Scale Stenographer BS-14	Steno Typist BS-14	Junior Clerk BS-11	Daftari BS-04	Class-IV BS-04	Naib Qasid BS-03/BS-04	Class-IV ES-03
								03			03		02	03	06
								01			02		02	03	06
								02			03				

No. 468 /BC,

**SUPERINTENDENT OF POLICE,
 INVESTIGATION, BUNER**

Copy of above is forwarded to Regional Police Officer, Malakand at
 Saidu Sharif, Swat for information, please.

**SUPERINTENDENT OF POLICE,
 INVESTIGATION, BUNER**

~~SECRET~~

(13)

Annex-D

D

SIGNAL.

FROM: - D.P.O. BUNER (.)
 TO: - P.P.O. KPK PESHAWAR (.)
 (w) D.I.G.P. MKD REGION SWAT (.)
 NO. 5305-06 /E, DT: 23/07 /2010 (.) SUBJECT (.)
 ABSORPTION/PROMOTION AS JUNIOR CLERK (.) KINDLY REFER
 TO C.P.O. KPK PESHAWAR'S SIGNAL NO. 17994-18060/E-III,
 DT: 21.07.2010 (.) THE FOLLOWING ARE HEREBY PERMITTED
 TO APPEAR IN THE TEST WHICH WILL BE HELD ON 28.7.2010
 C.P.O. PESHAWAR AT 08:00 HRS PLEASE (.) THEIR SERVICE

PARTICULARS ARE AS UNDER:-

S.NO.	NAME & RANK.	D/O BIRTH	DATE OF APPOINT:	QUALIFICATION
1.	NO: "SHER" ZADA	10.01.1974	03.04.2007	10th
2.	C-IV FAZAL ILAHI.	20.05.1977	05.07.2000	F.A.
3.	DAFTARI MUHAMMAD FAZIL.	13.03.1984	28.08.2008.	F.A.

D. Bun

D.P.O. BUNER (.)

26/7

ACC

Signal

FROM:- D.P.O. BUNER (.)
 TO:- P.P.O. KPK PESHAWAR (.)
 (W) D.I.G.P.MKD REGION SWAT (.)

NO, 5305-06/E, DT: 26/07/2010(.) SUBJECT (.)
 ABSORPTION/PROMOTION AS JUNIOR CLERK (.) KINDLY REFER
 TO C.P.O KPK PESHAWAR'S SIGNAL NO. 17994-18060/E-III, DT:
 21.07.2010 (.) THE FOLLOWING ARE HEREBY PERMITTED TO
 APPEAR IN THE TEST WHICH WILL BE HELD ON 28.07.2010 C.P.O
 PESHAWAR AT 08:00 HRS PLEASE (.) THEIR SERVICE PARTICULAR
 ARE AS UNDER:-

S.NO	NAME & RANK	D/O BIRTH	D/O APPOINT	QUALIFICATION
1.	NQ: SHER ZADA	10.1.1974	03.04.2007	10 TH
2.	C-IV FAZAL ILAHI	20.05.1977	05.07.2000	F.A
3.	DAFTARI MUHAMMAD.FAZIL	13.03.1984	28.08.2008	F.A

-SD-

D.P.O BUNER (.)

26/7



(14)

Annexure E

NOTIFICATION

Peshawar, dated the 04th February, 2009

NC. SOE-III(E&AD)1-8/2005. - In pursuance of the provisions contained in sub-rule (2) of Rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, hereby directs that in this Department's Notification No. SCR-I(S&GAD)4-2/82, dated 8th June, 1988, the following further amendments shall made, namely:

AMENDMENTS

In the Appendix, for the existing entries in columns No. 3, 4 and 5 against serial No. 7, the following shall be substituted in the respective columns, namely:

3	4	5
JUNIOR CLERK 3	Secondary School 18 - 20 years	c) Thirty three per cent by promotion
(i)	Certificate or equivalent qualification from a recognized Board; and	from amongst Daftaries and Naib Qasids or other equivalent posts with two years service as such, who have passed Secondary School Certificate Examination; and
(ii)	A speed of 30 words per minute in typing.	b) Sixty-seven per cent by initial recruitment.

Note:- For the purpose of promotion, there shall be maintained a common seniority list of Daftaries and Naib Qasids etc with reference to the dates of their acquiring the Secondary School Certificate.

Provided that:

ATTESTED
TO THE DEPT. SDRY
ADMINISTRATIVE

ABC

SoCC

11/2/09

14

GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(Establishment wing)

NOTIFICATION

Peshawar Dated the 04th February, 2009

NO. SCE-III(E&AD)1-8/2008.In pursuance of the provisions contained in sub-rule (a).of Rule 3 of the North-West Frontier Province, Civil Servant (Appointment, Promotion & Transfer) Rules, 1989, the establishment and Administration Department, in consultation with the Finance Department, hereby directs that in this Department's Notification No. SOR-I(S&GAD)4-2/82, dated 8th June, 1988, the following further amendments shall made namely:

AMENDMENTS

In the appendix, for the existing entries in column No. 3, 4 and 5 against serial No.7, the following shall be substituted in the respective column namely:

Junior Clerk 3	2	4	5
I.	Secondary School 18 Certificate or equivalent years qualification from a recognized Board and	a)	Thirty three percent by promotion from amongst DAftari and Naib Qasids or other equivalent posts with two years' service as such who have passed Secondary School Certificate Examination and
II.	A speed of 30 words per minute in typing	b)	Sixty-seven percent by initial recruitment.

Note:- For the purpose of promotion there shall be maintained a common seniority list of Daftari and Naib Qasids etc with reference to the dated of their acquiring the Secondary Scholl Certificate.

15

Encl. No. SOE-III(1-3/2008)

Peshawar, dated the 04th February, 2009

Copy forwarded to:

1. The Additional Chief Secretary, NWFP.
2. The Additional Chief Secretary FATA, Peshawar.
3. The Senior Member, Board of Revenue, N.-W.F.P.
4. All Administrative Secretaries to Government of N.-W.F.P.
5. The Accountant General, NWFP, Peshawar.
6. The Registrar, Peshawar High Court, Peshawar.
7. The Secretary to Governor, N.-W.F.P.
8. The Principal Secretary to Chief Minister, N.-W.F.P.
9. All Divisional Commissioners in NWFP.
10. All District Coordination Officers in N.-W.F.P.
11. All Heads of Attached Departments in N.-W.F.P.
12. The Secretary, NWFP Public Service Commission, Peshawar.
13. The Director, Anti-Corruption Establishment, N.-W.F.P., Peshawar.
14. The Registrar, NWFP Service Tribunal, Peshawar.

(Syeda Farzeela Sabhat)
Section Officer (E-III)

Peshawar, dated the 04th February, 2009

Encl. No. SOE-III(E&AD)1-3/2008

Copy forwarded to:

1. The Special Secretary (Regulations), Establishment Department, GoNWFP.
2. The Director, Staff Training Institute, E&A Department, Peshawar.
3. All Additional Secretaries in E&A Department, GoNWFP.
4. The Reforms Coordinator, Establishment Department.
5. All Deputy Secretaries in E&A Department, GoNWFP.
6. All Section Officers in E&A Department, GoNWFP.
7. Private Secretary to Chief Secretary, N.-W.F.P.
8. Private Secretary to Secretary, Establishment Department, GoNWFP.
9. Librarian, E&A Department.

(Syeda Farzeela Sabhat)
Section Officer (E-III)

OFFICE OF THE DIRECTOR E&SE NWFP, PESHAWAR.

Encl. No. 7751-79 F.No. 70/Vol. II. dt. Peshawar the 6/3/2009

Copy of the above alongwith its xxx enclosures is forwarded for n/action & strict compliance to the:

- 1-24: All the EDOs(E&SE) in N.W.F.P.
- 25-27: All the Deputy Director's Local Office.
- 28: Section Officer (Gen) E&SE Deptt. w/r to his No. cited above for information please.
- 29: PA to Director local office.

ATTENDED
10 OF FEBRUARY 2009

[Handwritten signature]

Section Officer (E-III)
Peshawar

15

Better Copy

Page # 15

NO. SCE-III(E&AD)1-8/2008

Peshawar Dated the 04th February, 2009

Copy forwarded to :-

1. The Additional Chief Secretary, NWFP.
2. The Additional Chief Secretary FATA, Peshawar.
3. The Senior Member, Board of Revenue of NWFP.
4. All Administrative Secretaries to Government of NWFP.
5. The Accountant General NWFP, Peshawar.
6. All Registrar, Peshawar High Court, Peshawar.
7. The Secretary to Governors NWFP.
8. The Principal Secretary to Chief Minister NWFP.
9. All Divisional Commissioners in NWFP.
10. All District Coordination Officers in NWFP.
11. All Heads of Attached Departments in NWFP.
12. The Secretary NWFP Public Service Commission Peshawar.
13. The Director Anti-Corruption Establishment NWFP Peshawar.
14. The Registrar NWFP Service Tribunal Peshawar.

(Syeda Tanzeela Salahat)

Section Officer (E-III)

Endst No. SCE-III(E&AD)1-8/2008

Peshawar Dated the 04th February, 2009

Copy forwarded to :-

1. The Special Secretary (Regulations), Establishment Department NWFP.
2. The Director Staff Training Institute E&A Department, Peshawar.
3. All Additional Secretaries in E&A Department NWFP.
4. The Reforms Coordinator, Establishment Department.
5. All Deputy Secretaries in E&A Department Go NWFP.
6. All Section Officers in E&A Department GO NWFP.
7. Private Secretary to Chief Secretary NWFP
8. Private Secretary to Secretary Establishment Department Go NWFP
9. Librarian, E&A Department.

(Syeda Tanzeela Salahat)

Section Officer (E-III)

Office of the Director E&SE NWFP Peshawar.

Endst. No, 7751-79/F.No.70/Vol.IIDt: Peshawar the 06.03.2009

Copy of the above alongwith its xxx enclosures is forwarded for n/action & strict compliance to the

1-24 All the EDOs (E&SE) in NWFP.

25-27 All the Deputy Directors Local Office.

28 Section Officer (Gen) E&SE Deptt: w/r to his No. cited above for information, please.

29 PA to Director Local Office.

SIGNAL

From :

PESHAWAR POLICE (.)

THE ADDL: IsG OF POLICE, SPECIAL BRANCH
INVESTIGATION, COMMANDANT PTC
HANGU/COMMANDANT FRP & COMMANDANT ELITE
FORCE KHYBER PAKHTUNKHWA.

THE CAPITAL CITY POLICE OFFICER PESHAWAR (.)

ALL DisG IN KHYBER PAKHTUNKHWA (.)

ALL SsP/INVESTIGATION IN KHYBER PAKHTUNKHWA
PESHAWAR.

ALL DPOS IN KHYBER PAKHTUNKHWA

THE AIG/FINANCE & PROCUREMENT & AIG/Legal C.I.

THE BUDGET OFFICER CPO (.)


ALL OFFICE SUPDTS: IN CPO (.)

THE RESERVE INSPECTOR CPO PESHAWAR WITH TH
DIRECTION TO MAKE ARRANGEMENTS FOR TYPIN
MACHINES, FURNITURE & EXAMINATION CENTRE (.)

17994-18060 STATIONED AT PESHAWAR BY HAND (.)

No. 17994-18060/E-III dated Peshawar the 21 / 7 /2010

SUBJECT (.) ABSORPTION /PROMOTION AS JUNIOR CLERKS (.)
CONTINUATION OF THIS OFFICE NO. 11896-915/E-III DATE
04.05.2010(.) ALL THE CANDIDATES I.E. DAFTARI, N/QASIDS AT
CLASS-IV ETC WHO HAVE APPLIED FOR PROMOTION TO THE RANK
JUNIOR CLERKS AND HAVE COMPLETED TWO YEARS SERVICE
28.07.2010 MAY BE DIRECTED TO REPOT AT CPO AT 0700 HRS
28.07.2010(.) THEY WILL APPEAR IN THE TEST AFTER OBTAIN
PERMISSION FROM THE COMPETENT AUTHORITY (.) INDIVIDUAL W
DO NOT FULFILL THE REQUIRED CONDITION SHOULD NOT
ALLOWED(.)


AIG/LEGAL
FOR PROVINCIAL POLICE OFFICE
KHYBER PAKHTUNKHWA PESHAWAR



ANNEX (F)

17
398
24/05/10

ORDER

The following daftari, Class-IV and N/Qasid of Khyber Pakhtunkhwa Police are hereby promoted to the posts of Junior Clerks (BS-07) in pursuance of Govt. of Khyber Pakhtunkhwa Notification No. SOR IV (N/Qasid) 1-1/95 (D) dated 13.03.1997 with immediate effect.

Their promotion as Junior Clerk (PBS-07) will take effect from the date they actually take over the charge of higher responsibilities.

On promotion they are posted to the offices noted against their names:

S/No	Name & present posting	Place of posting
1	Asghar Alam of Special Branch	Malakand Region
2	Sanaullah of FRP/HQrs	Malakand Region
3	Fazle Zaman of DIG/Kohat	Kohat Region
4	Ahmad Ali of Investigation Mardan	Malakand Region
5	Irfanullah of DIG/Kohat	Kohat Region
6	Muhammad Adil of Special Branch	Malakand Region
7	Ajmal Khan of CPO, Peshawar	Malakand Region
8	Hardeep Kumar of DIG/Malakand	Malakand Region
9	Abdul Majeed of DPO/Kohistan	Hazara Region
10	Rahmanullah of DPO/Bannu	Malakand Region
11	Niaz Wali of DIG/Kohat	Malakand Region
12	Muhammad Javed of DIG/Bannu	Malakand Region
13	Qaiser Farooq of DPO/Abbottabad	Hazara Region
14	Shoukat Ali of DPO/Swabi	Malakand Region
15	Amir Pervez of CCP/Peshawar	Malakand Region
16	Haider Ali of Investigation Mardan	Malakand Region
17	Muhammad Kamran of DPO/DIKhan	DIKhan Region
18	Sharafat Khan of SP/Inv: Batagram	Hazara Region
19	Adil Khan of DIG/Hazara	Hazara Region
20	Muhammad Arif of DPO/Mardan	Malakand Region
21	S. Bidar Shah of RTW/Mansehra	RTW/Mansehra.

For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

No. 18517-27 /E-III, dated Peshawar the 03/05/2010.

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

1. Addl. IGP/Special Branch Khyber Pakhtunkhwa Peshawar
2. Capital City Police Officer Peshawar
3. Deputy Inspector General of Police Malakand Region
4. Deputy Inspector General of Police Hazara Region
5. Deputy Inspector General of Police DIKhan Region
6. Deputy Inspector General of Police Bannu Region
7. Deputy Inspector General of Police Mardan Region
8. Deputy Inspector General of Police Kohat Region
9. Principal RTW/Mansehra
10. Office Supdt. Secret CPO Peshawar
11. Assistant CPO Peshawar

25/05/2010

Order:

The following daftari, Class-IV and N/Qasid of Khyber Pakhtunkhwa Police are hereby promoted to the posts of Junior Clerk (BS-07) in pursuance of Government of Khyber Pakhtunkhwa Notification No. SOR IV.....AD) 1-1/95 (D) dated 13.03.1997 with immediate effect.

Their promotion as Junior Clerk (BPS-07) will take effect from the date they actually take over the charge of higher responsibilities.

On promotion they are posted to the offices noted against their names.

S/No	Name & Present Posting	Place of Posting
1.	AsgharAlam of Special Branch	Malakand Region
2.	Sana Ullah of FRP/Hors	Malakand Region
3.	FazleZaman of DG/ Kohat	Kohat Region
4.	Ahmad Ali of Investigation Mardan	Malakand Region
5.	Irfanullah of DIG/ Kohat	Kohat Region
6.	Muhammad Adil of Special Branch	Malakand Region
7.	Ajmal Khan of CPO Peshawar	Malakand Region
8.	Hardeep Kumar of DIG/ Malakand	Malakand Region
9.	Abdul Majeed of DPO / Kohistan	Hazara Region
10.	RehmatUllah DPO/ Bannu	Malakand Region
11.	NiazWali of DIG/ Kohat	Malakand Region
12.	Muhammad Javed of DIG/ Bannu	Malakand Region
13.	QaiserFarooq of DPO/ Abbottabad	Hazara Region
14.	Shaukat Ali of DPO / Swabi	Malakand Region
15.	Amir Parvez of CCP/ Peshawar	Malakand Region
16.	Haider Ali of Investigation Mardan	Malakand Region
17.	Muhammad Kamiran of DPO/ DIKhan	DIKhan Region
18.	Sarafat Khan of SP/ Inv: Batagram	HAzara Region
19.	Adil Khan of DIG/Hazara	Hazara Region
20.	Muhammad Arif of DPO/ Mardan	Malakand Region
21.	S. Baidar Shah of RTN/ Mansehra	RTW/ Mansehra

For Provincial Police Officer

Khyber Pakhtunkhwa, Peshawar

No. 185/7-27/E-III, dated Peshawar the, 03.08.2010

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

1. Additional IGP/Special Branch Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar
3. Deputy Inspector General of Public Malakand Region.
4. Deputy Inspector General of Public Hazara Region.
5. Deputy Inspector General of Public DI Khan Region.
6. Deputy Inspector General of Public Bannu Region.
7. Deputy Inspector General of Public Mardan Region.
8. Deputy Inspector General of Public Kohat Region.
9. Principal RTW/Mansehra.
10. Office Suypdt: Secret: CPO Peshawar
11. Accountant CPO Peshawar.

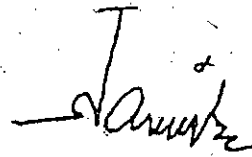
~~17~~

(18)

ORDER

On their promotion / arrival vide CPO Khyber Pakhtoonkhwa Order issued over Endst. No. 18517-22/E-I dated 03/08/2010 the following Junior Clerks are hereby transferred / posted to the districts as noted against each:-

S.No.	Name	Posted	District
1	Junior Clerk Ahmad Ali	Dir Lower	
2	Junior Clerk Shaukat Ali	Dir Upper	
3	Junior clerk Haidar Ali	Buner	
4	Junior Clerk Asghar Alam	Region Office Swat	
5	Junior Clerk Sanauallah	Buner	
6	Junior Clerk Muhammad Ac	Swat	
7	Junior Clerk Na eep Kumar	Region	



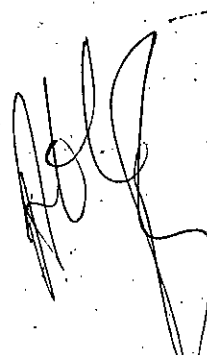
(OAZI JAMILUR RAHMAN)
Duputy Inspector General of Police
Malakand Region Saidu Sharif Swat

7453-62/E

Date 10/8/2010

- 1. District Office, Dir Lower
- 2. District Office, Dir Upper
- 3. District Office, Buner
- 4. District Office, Region Office Swat
- 5. District Office, Buner
- 6. District Office, Swat
- 7. District Office, Region Office Swat
- 8. District Office, Region Office Swat
- 9. District Office, Region Office Swat
- 10. District Office, Region Office Swat

FC



Per N/A
13/8

Copy handed to the concerned
and
study

(78) (18) (19)

**FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE
GAZETTE PART-II ORDERS BY THE PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA, PESHAWAR.**

NOTIFICATION

Dated: 25/8/2010

No. 19890 /E-III. APPOINTMENT/POSTING: Having been approved by Departmental Selection Committee the following candidates are hereby appointed as Junior Clerks BPS.07 (3530-190-8850) purely on temporary basis in the Khyber Pakhtunkhwa Police with effect from the date they actually reports for duty their place of posting subject to medical fitness and verification of character and antecedents and educational certificates from their concerned Boards

The condition of their services will be as under:-

1. Their services are liable to be terminated within 14 days notice without assigning any reason.
2. They will neither be confirmed as Junior Clerk nor considered for further promotion until and unless they passes type test/departmental training etc. during the period of their services as Junior Clerks failing which their services will be dispensed with.

1.	Mr. Shakeel Jan s/o Tehseenallah r/o District Charsadda.
2.	Mr. Saleem Jan s/o Waheed Jan r/o District Charsadda.
3.	Mr. Muhammad Bashir s/o Faqir Hussain r/o Peshawar
4.	Mr. Wisal Ahmad s/o Neer Muhammad r/o District Charsadda.
5.	Mr. Tahir Nawab s/o Yar Nawab r/o Peshawar.
6.	Mr. Rab Nawaz s/o Hazrat Said r/o District Charsadda.
7.	Mr. Mohsin s/o Masim r/o Peshawar
8.	Mr. Shakoor Khan s/o Samad Gul r/o District Charsadda.
9.	Mr. Irshad Khan s/o Raza Khan r/o Peshawar
10.	Mr. Muzamil Ahmad Khan s/o Shabir District Abbottabad
11.	Mr. Muhammad Adil Hayat s/o Muhammad Hayat District Nowshera
12.	Mr. Sardar Ali s/o Sardar Abdul Hassan District Peshawar
13.	Mr. Younis Khan s/o Khaid Khan District Peshawar.
14.	Mr. Ihsanullah s/o Niamatullah District Dikhan.
15.	Mr. Tasawat Iqbal s/o Ghulam Rabani District Dikhan.

No. 19891 /E-III

On appointment as Junior Clerks they are posted to the Regions/Offices noted against their names:-

Compliance be reported to this office within a month with full particulars.

S/NO	NAME	PARENT DISTRICT	PLACE OF POSTING
1.	Shakeel Jan	Charsadda	Malakand Region
2.	Saleem Jan	Charsadda	Malakand Region
3.	Muhammad Bashir	Peshawar	Malakand Region

Handwritten signature

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDERS BY THE PROVINCIAL POLICY OFFICER KHYBER PAKHTUNKHWA,
PESHAWAR.

NOTIFICATION

No. 19890/E-III, APPOINTMENT/POSTING: Having been approved by Department Selection Committee the following candidate are hereby appointed as Junior Clerk BPS-07 (3530-190-8850) purely on temporary basis in the Khyber Pakhtunkhwa Police with effect from the date they actually reports for duty their place of posting subject to medical fitness and verification of character and analscedents and educational certificate from their concerned Boards

The conditions of their service will be as under:

1. Their services are liable to be terminated within 14 days notice without assigning any reason.
2. They will neither be confirmed as Junior Clerk nor considered for further promotion under and unless they passes type test/departmental training etc. during the period of their services as Junior Clerk failing which their services will be dispensed with.

1.	Mr. Shakeel Jan S/o Tehsenullah R/o District Charsadda
2.	Mr. Saleem Jan S/o Waheed Jan R/o District Charsadda
3.	Mr. Muhammad Bashir S/o Faqir Hussain R/o Peshawar
4.	Mr. Wisal Ahmad S/o Meer Muhammad R/o District Charsadda
5.	Mr. Tahir Nawab s/o Yar Nawab R/o Peshawar
6.	Mr. Rab Nawab S/o Hazrad Said R/o District Charsadda
7.	Mr. Mohsin S/o Muslim R/o Peshawar
8.	Mr. Shakoor Khan S/o Samad Gul R/o District Charsadda
9.	Mr. Irshad Khan S/o Raza Khan R/o Peshawar
10.	Mr. Muzammil Ahmad Khan S/o Shabir District Abbottabad
11.	Mr. Muhammad Adil Hayat S/o Muhammad Hayat Dissect Nowshera
12.	Mr. Sardar Ali S/o Sardar Abdul Hassan District Peshawar
13.	Mr. Younis Khan S/o Khalid Khan District Peshawar
14.	Mr. Ihsanullah S/o Naimatullah District DI Khan
15.	Mr. Tasawar Iqbal S/o Ghulam Rabbani District DI Khan

No. 19891/E-III

On appointment as junior Clerks they are posted to the Region/ Offices noted against their names:-

Compliance be reported to this office within a month with full particulars.

S.No	Name	Parent District	Place of Posting
1	Shakeel Jan	Charsadda	Malakand Region
2	Saleem Jan	Charsadda	Malakand Region
3	Muhammad Bashir	Peshawar	Malakand Region

Handwritten signatures and initials.

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4.	Wisal Ahmad	Charsadda	Malakand Region
5.	Tahir Nawab	Peshawar	Malakand Region
6.	Rab Nawaz	Charsadda	Hazara Region
7.	Mohsin s/o Muslim	Peshawar	Malakand Region
8.	Shakoor Khan	Charsadda	Malakand Region
9.	Irshad Khan	Peshawar	Malakand Region
10.	Muzamil Ahmad Khan	Abbottabad	FRP/Hazara
11.	Muhammad Adil Hayat	Nowshera	Hazara Region
12.	Sardar Ali	Peshawar	Hazara Region
13.	Younis Khan	Peshawar	Hazara Region
14.	Insanullah	DIKhan	DIKhan Region
15.	Tasawar Iqbal	DIKhan	Kohat Region

sd/-

MALIK HAVED KHAN
Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

No. 19872-905
12-11

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

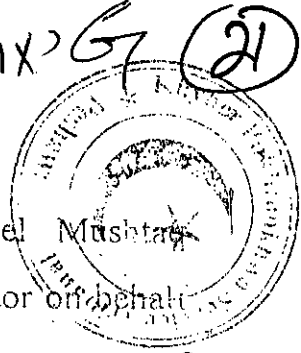
1. Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar alongwith 07 spear copies for publication in the Khyber Pakhtunkhwa Gazette Part-II.
2. Capital City Police Office Peshawar.
3. Deputy Inspectors General of Police, Hazara, Kohat, DIKhan & Malakand Regions.
4. Commandant FRP Khyber Pakhtunkhwa, Peshawar.
5. SP/FRP Hazara Region.
6. D/NOs, Charsadda, Nowshera, DIKhan & Abbottabad.
7. Supdt: Secret CPO Peshawar.
8. Official concerned

(ABDUL MAJEED KHAN MARWAT)
PSP

Addl: IGP/Headquarters,
For Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar.

Handwritten signature

Appeal No. 11951/2011 (Anx) G (21)
Sherzada vs Govt



04.07.2018

Mr. Sherzada appellant alongwith counsel Mushtaq Ahmad Advocate present. Mr. Hussain Zada Inspector of behalf of respondents alongwith Mr. Usman Ghani present.

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Arguments heard. File perused.

During the course of arguments it was pointed out that lists of Naib Qasid and Daftaris etc from very districts were sought by the Provincial Police Officer for the purpose of fixation of seniority cum fitness inter see so as to promote the most senior officials as per quota fixed under the law from amongst the staff members. This list was prepared and the appellant's name figured at serial No. 42 whereas total 21 Naib Qasids etc were promoted and in this way, the appellant is far away from the promotion range. So when this situation was confronted with the learned counsel for the appellant, he conceded the said fact and requested this Tribunal to allow the appellant to withdraw the appeal in hand and move this Tribunal again if his right of promotion is infringed by the respondents in future. The request is allowed and the appeal in hand is dismissed as withdrawn. The appellant will be at liberty to move competent authority as well as this Tribunal if his right of promotion is infringed or any is order passed by the authority against his interest. In the circumstances, parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
04.07.2018

Member
Chairman
Comp. Court Swat

Certified to be true copy

EX-100
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 9-7-18
Number of Words 800
Copying Fee 6
Urgent
Total 600
Name of C.A.
Date of Completion 12-7-18

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From:- The Superintendent of Police,
Investigation, Buner.

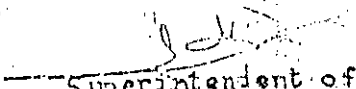
To:- The Deputy Inspector General of Police,
Malakand Region-III, Saidu Sharif, Swat.

No: 27 /FC, Dated Daggar the. -/ /2011.

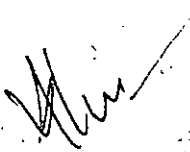
SUBJECT:=APPLICATION FOR THE POST OF JUNIOR CLERK.

MEMO:=
An application submitted by Naib Qasid Sher Zada
of this office for the post of Junior Clerk is submitted herewith
for favour of consideration please.

Encl: (1)


Superintendent of Police,
Investigation, Buner.

Attested





From :- The Superintendent of Police
Investigation, Buner.

To:- The Deputy Inspector General of Police,
Malakand Region-III Saidu Sharif, Swat

No. 27/FC, Dated Baggar the 1/2011


Subject:- APPLICATION FOR THE POST OF JUNIOR CLERK

Memo:-

An application submitted by Naib Qasid Sher Zada of this Office for the post of Junior Clerk is submitted herewith for favour of consideration please.

-sd-

Superintendent of Police,
Investigation Buner

A handwritten signature in black ink, appearing to be 'Ase', written in a cursive style.

From:-

The Superintendent of Police,
Investigation, Buner.

To:-

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

No:

27

/FC, Dated Daggar the -/ /2011.


SUBJECT: =

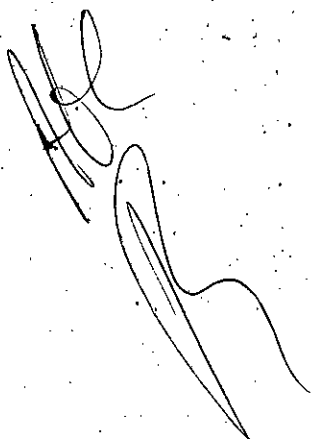
APPLICATION FOR THE POST OF JUNIOR CLERK.

MEMO: =

An application submitted by Naib Qasid Sher Zada of this office for the post of Junior Clerk is submitted herewith for favour of consideration please.

Encl: (1)


Superintendent of Police,
Investigation, Buner.



20 24

The Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

From

The Provincial Police Officer,
Khyber Pukhtoonkhwa, Peshawar.

To

No. 1082 /E, dated Saidu Sharif, the 10/12 /2011.

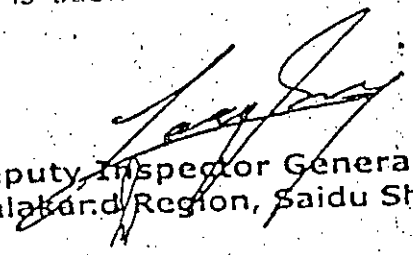
Subject: APPLICATION FOR ABSORPTION AS A JUNIOR CLERK.

Memorandum:

Naib Qasid Sher Zada of Investigation Staff, Buner has requested for absorption as Junior Clerk.

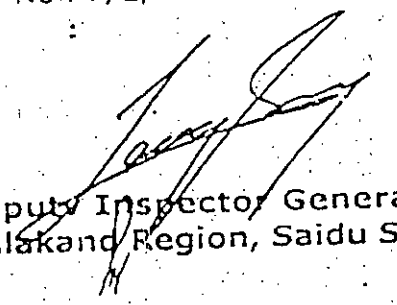
His application in original is submitted herewith consideration, please.

Encls:- APPLICATION.


Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

No. 1083 /E,

Copy to Superintendent of Police, Investigation, Buner for information with reference to his office Memo: No. 77/E, dated 06/01/2011.


Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.



1-7

AMMEX-C

(Signature) 25

From : The Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

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

No. 1082 / E, dated Saidu Sharif, the 10/9 / 2011.

Subject: APPLICATION FOR ABSORPTION AS A JUNIOR CLERK.

Memorandum:

Naib Qasid Sher Zada of Investigation Staff, Buner has requested for absorption as Junior Clerk.

His application in original is submitted herewith consideration, please.

Encls: - APPLICATION.

(Signature)
Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

No. 1083 / E.

Copy to Superintendent of Police, Investigation, Buner for information with reference to his office Memo: No. 77/E, dated 06/01/2011.

(Signature)
Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

AHested
(Signature)

(Signature)

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 1195/2011

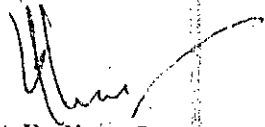
Sher Zada Naib Qasid District Police Buner.....appellant

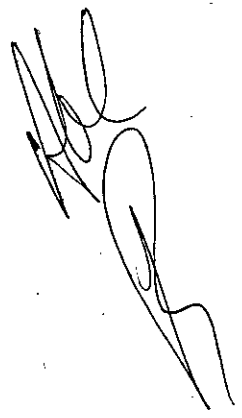
Yersus

1. The Regional Police Officer Malakand Region Saidu Sharif Swat.
2. The District Police Office Buner.....respondents

INDEX

S#	DOCUMENTS	ANNEX	PAGE
1	Parawise comments	--	1 & 2
2	Affidavit	--	3
3	Authority Letter	--	4
4	Copy of the Signal of DPO Buner	"A"	5
5	Copy of the Memo: of SP Invest; Buner	"B"	6
6	Copy of the letter of DICI MKD	"C"	7


**District Police Officer
Buner**
(Respondent No. 2)



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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 1195/2011

Sher Zada Naib Qasid District Police Buner.....appellant

Versus

1. The Regional Police Officer Malakand Region Saidu Sharif Swat.
2. The District Police Office Buner.....respondents

Para Wise comments on behalf of the Respondents No. 1 and 2

Respectfully Sheweth:

PRELIMINARY OBJECTIONS: -

1. That the appeal is time barred.
2. That the appellant may be estopped due to his own conduct.
3. That the Current appeal is bad in present form and is liable to be dismissed.
4. That the Honorable Service Tribunal has got no jurisdiction.
5. That the current appeal is bad due to non-joinder and mis-joinder of necessary parties.
6. That the appellant has got no locus standi and cause of action against the respondents.
7. That the respondents have done nothing illegal which can be challenged.

ON FACTS: -

1. Para No.1 of the appeal relates to the service record of the appellant, therefore, needs no comments.
2. Para No. 2 of the appeal is admitted.
3. Para No. 3 of the appeal is admitted to the extent that the office of the Provincial Police Officer, Peshawar called for the names of qualified Naib Qasids from all DPOs etc. The rest is dined. Directions were issued in the letter No. 1896-915, that the names be forwarded of qualified Naib Qasids for participation in the test and interview for the respective posts.
4. Para No. 4 of the appeal is admitted.
5. Para No. 5 of the appeal is admitted.
6. Para No. 6 of the appeal is not admitted due to no knowledge and information of the respondents. The test and interview did not hold under the authority and jurisdiction of the respondents.
7. Para No. 7 of the appeal needs no comments.
8. Para No. 8 of the appeal is admitted to the extent that the respondents forwarded name of the appellant as eligible to the office of the provincial police officer. The

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rest is dined. The respondents neither conducted any test nor interview which has aggrieved the appellant and adversely affected him. The respondents have just forwarded the name of the appellant, whereas the powers and functions of promotion / appointment were exercised by the worthy Provincial Police Officer. The respondents didn't have the power to appoint the appellant as junior clerk on the quota reserved for the qualified Naib Qasids. Vide signal No. 5305-06/E, dated 26.07.2010 as a Annexure-A.

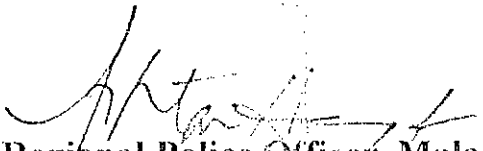
9. Para No. 9 of the appeal is admitted to the extent that the appellant got his application forwarded to the respondent No. 1. The rest is dined. The same application of the appellant was forwarded by the respondent No. 1 to the Provincial Police Officer, whose office was the proper forum for the same, because the appointing authority in this regard was the worthy PPO, and not the respondent No. 1 and 2. Vide Memo: of SP Investigation and letter of DIG Malakand as Annexures- B & C respectively.

ON GROUNDS: -

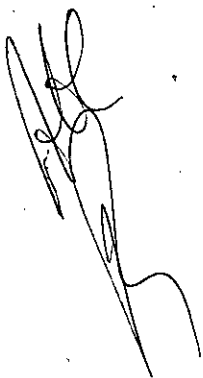
- A. Incorrect. The respondents had nothing to do with the appointment / promotion of the appellant on the reserved quota. The authority in this regard was exercised by the worthy Provincial Police Officer.
- B. Incorrect. The respondents had no power and authority to promote / appoint the appellant against the vacant posts of junior clerks reserved for the qualified Naib Qasids.
- C. Incorrect. The respondents have not violated any Law or Rules in this connection.
- D. That the respondents also seek the permission of this Honorable Tribunal to adduce more grounds and points at the time of arguments.

PRAYER.

Hence in view of the above comments the respondents most humbly pray from this Honorable Tribunal that the current appeal is without substance and cogent reasons may be dismissed with costs.


**Regional Police Officer, Malakand
Region Swat
(Respondent No. 1)**


**District Police Officer,
Buner**



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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 1195/2011

Sher Zada Naib Qasid District Police Buner.....appellant

Versus

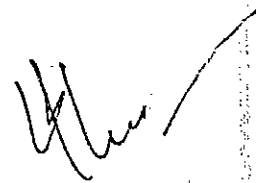
1. The Regional Police Officer Malakand Region Saidu Sharif Swat.
2. The District Police Office Buner.....respondents

Affidavit:-

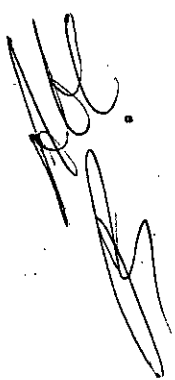
We the above respondents do hereby solemnly affirm and declare on oath that the paravise comments to the Service Appeal as cited above are correct to the best of our knowledge and belief and nothing has been concealed from the Honorable Service Tribunal.



Regional Police Officer, Malakand,
Region Swat
(Respondent No. 1)



District Police Officer
Buner
(Respondent No. 2)



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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 1195/2011


Sher Zada Naib Qasid District Police Buner.....appellant

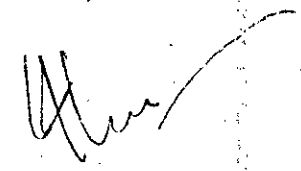
Versus

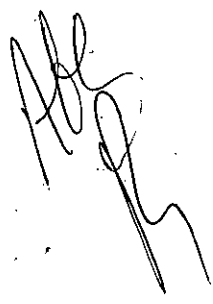
1. The Regional Police Officer Malakand Region Saidu Sharif Swat.
2. The District Police Office Buner.....respondents

AUTHORITY LETTER

We the above respondents do hereby authorize Mr. Imranullah SI Legal Buner to attend the Service Tribunal on each date fixed and do whatever is needed in the court regarding the Service Appeal No. 1195/2011 titled as above.


Regional Police Officer, Malakand,
Region Swat
(Respondent No. 1)


District Police Officer
Buner
(Respondent No. 2)



LIST OF N/Q, DAFTARI, CLASS-IV APPLIED FOR ABSORPTION / PROMOTION AS JUNIOR CLERK

S#	Name	Rank	D.O.B	Date of Enlistment	Education	Present posting	Age (YY-MM-DD)	Total Service (YY-MM-DD)	Remarks
1.	M. Fayaz	Daftari	20-04-67	20-02-1988	10 th	FRP Kohat	13-01-04	22-03-11	
2.	Fazle Hameed	N/Q	01.05.70	13.03.88	10 th	FRP Kohat	30.00.10	22.02.19	
3.	Usman Ali	N/Q	02-01-71	10-04-1988	10 th	FRP Swat	40-00-10	22-01-10	
4.	Amin Khan	N/Q	12-10-70	08-09.1990	10 th	Training Center Hangu	39-07-13	19-08-17	
5.	Ihsan ullah	N/Q	01.03.1966	01.02.1991	10 th	DIG Malakand Swat	44.02.26	19.03.26	
6.	Mukhtiar Hassan Shah	Daftari	30-05-65	20-01-1992	10 th	DPO Hangu	44-11-26	18-04-05	
7.	Dil Nawaz	Daftari	01.04.1973	10.09.1992	10 th	RPO Bannu	37.01.29	17.08.15	
8.	Sakhi Jan	N/Q	01-10-74	11-11-93	10 th	CCPO Peshawar	35-07-12	16-06-02	
9.	Abdul Majeed	Daftari	01-01-78	1-1-1995	10 th	DPO Kohistan	32-03-12	15-04-10	
10.	Niaz Wali	N/Q	05.04.67	16.01.96	10 th	DIG Kohat Range	43.01.23	14.04.12	
11.	Asif Khan	N/Q	14-05-77	06.05.96	10 th	CCPO Peshawar	33.00.06	14-00-14	
12.	Barkat Ali	NQ	19.05.1977	30.5.1996	10 th	DIG Malakand Swat	33.00.06	13.11.28	
13.	Sarnab Zeb	Class IV	01.01.1966	23.05.1999	10 th	DIG Malakand Swat	44.04.26	11.00.04	
14.	Azizur Rehman	Mali	04-04-74	20-7-1999	10 th	DIG DIKhan	36-01-09	10-09-24	
15.	Taswar Hussain	N/Q	12.03-80	21.01.2000	10 th	Special Branch	30.02.06	10-03-30	

ment

Remarks

	Name	Rank	D.O.B	Date of Enlistment	Education	Present posting	Age (YY-MM-DD)	Total Service (YY-MM-DD)
16.	Jamshaid	N/Q	01-11-70	01-04-2000	10 th	DIG Hazara	06-12	10-01-12
17.	Saeed ur Rehman	W/Carrier	02-04-77	21-06-2000	10 th	DPO Kohistan	01-09	09-11-09
18.	Fazale Elahi	N/Q	20-05-77	05-07-2000	10 th	DIG Malakand Swat	00-07	09-10-22
19.	Ikhtlaq Ahmed	N/Q	07.04.82	08.07.2000	F.A	DIG Kohat Range	01.21	09.10.20
20.	Walayat Sahib	N/Q	15-12-71	17-8-2000	10 th	DIG Hazara	05-29	09-08-27
21.	Sajid Khan	Class-IV	09-02-82	09-02-2001	10 th	DPO Abbottabad	03-2	09-03-04
22.	Shahid Rasool	Bahishti	02.07.83	17.07.2001	10 th	RPO Bannu	10.15	08.10.00
23.	Amer Pervaiz	N/Q	4-10-82	04-10-2001	10 th	CCPO Peshawar	7-10	08-07-10
24.	Hardeep Kumar	N/Q	01.01.1981	25.08.2003	10 th	DIG Malakand Swat	04.26	06.09.06
25.	M. Nadeem Khan	Water Carrier	10-09-83	27-10-2003	10 th	DIG Kohat	08-15	06-06-29
26.	Nadeem Shah	Daftari	07.03.74	08.11.2003	10 th	DPO Nowshera	02.13	06.06.12
27.	Abdur Rehman	Sweeper	04.10.1974	17.11.2003	10 th	DIG Kohat Range	07.20	06.06.07
28.	Muhammad Usman	N/Q	19.02.79	24.11.2003	10 th	SP Investigation Hazara	03.05	06.05.24
29.	Asad Iqbal	N/Q	12.01.80	03.01.04	10 th	DIG Malakand Swat	04.15	06.04.28
30.	Musa Imran	Class IV	20.08.81	12.01.04	10 th	FRP/HQ Peshawar	09.05	06.04.25
31.	Ashab ur Rehman	Washer Man	04.04.76	07.08.2004	D.com	DPO Chitral	01.08	05.09.20
	Ameer Zeb	N/Q	20.08.82	01.09.04	10 th	DIG Malakand Swat	02.07	05.08.26

Attc

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	Name	Rank	D.O.B	Date of Enlistment	Education	Present posting	Age (YY-MM-DD)	Total Service (YY-MM-DD)	Remarks
33.	Farman Ali Shah	Watch man	05.04.86	28.10.2004	F.A	DIG Kohat Range	10.1.13	05.07.00	
34.	Ajmal Khan	N/Q	25-01-80	17-02-2005	10 th	CPO Peshawar	10.1.19	05-02-27	
35.	Akhtar Ayaz	N/Q	5-9-1980	26-03-2005	10 th	CPO Peshawar	12-08-06	05-01-26	
36.	Mehmood	Chowkidar	04.10.82	06.05.2005	10 th	DIG Bannu	12-07-03	05.00.11	
37.	Naseem Khan	Sweeper	24-06-80	07-01-2006	10 th	DPO Kohat	12-11-06	04-04-18	
38.	Abdul Ali	N/Q	05.02.86	02.06.06	F.A	SP/Inv Tank	14-02-12	03.11.15	
39.	S.Niaz Ali Shah	N/Q	12-12-83	26-09-2006	F.A	CCPO Peshawar	16-5-2	03-07-18	
40.	Muhammad Arif	Class-IV	21-08-63	04-01-2007	10 th	DPO Mardan	11-09-04	03-04-21	
41.	Rehmanullah	Daftari	16.04.86	09.01.2007	F.A	DPO Bannu	14-01-01	03.04.08	
42.	Sher Zada	N/Q	10.01.74	03.04.07	10 th	DIG Malakand Swat	16-04-17	03.01.24	
43.	Habib Khan	Chowkidar	25-12-85	31-03-2007	10 th	SP Invest: Nowshera	14-4-19	03-01-13	
44.	Haidar Ali	Class-IV	5-2-85	10-05-2007	10 th	SP Invest: Mardan	15-03-06	03-00-01	
45.	Muhammad Mehtab	Class IV	01.03.84	07.07.2007	10 th	DPO Mansehra	16-02-11	02.10.24	
46.	Tariq Khan	N/Q	13-8-87	11-07-2007	10 th	CCPO Peshawar	12-9-01	02-10-20	
47.	Adil Khan	N/Q	16.04.84	01.08.2007	10 th	DIG Hazara	16-01-11	02.09.26	
48.	M.Kamran	N/Q	5-4-89	07-08-2007	10 th	DPO DIKhan	21-1-8	02-09-06	

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#	Name	Rank	D.O.B	Date of Enlistment	Education	Present posting	Age (YY-MM-DD)	Total Service (YY-MM-DD)	Remarks
49.	Umar Ayaz	N/Q	18.03.87	18.09.2007	10 th	DIG Kohat Range	02.10	02.08.10	
50.	M Younas Shah	N/Q	01-01-87	10-10-2007	10 th	FRP Range Bannu	04-24	02-07-10	
51.	M. Imran	N/Q	16-1-81	22-10-2007	10 th	DPO DIKhan	03-28	02-06-27	
52.	Asghar Alam	Daftari	24-2-84	22-10-2007	B.A	Special Branch	02-14	02-06-20	
53.	S Asif Ali Shah	N/Q	11-04-79	15-11-2007	F.A	CCPO Peshawar	01-06	02-06-07	
54.	M. Sohail	Class-IV	10-04-87	14-11-2007	10 th	SP Invest: Manshra	01-03	02-05-30	
55.	S. Baidar Shah	Cook	21-04-80	16-11-2007	10 th	RTW Manshra	00-23	02-05-28	
56.	Babar Zaman	N/Q	20-01-82	16-11-2007	10 th	RTW Manshra	03-24	02-05-28	
57.	Irfanullah	Daftari	03-11-80	29-11-2007	10 th	DIG Kohat	06-22	02-05-27	
58.	Qaisar Farooq	N/Q	12-04-85	16-11-2007	10 th	DPO Abbottabad	00-30	02-05-26	
59.	Shams Wali	N/Q	01-01-81	12-12-2007	F.A	CPO Peshawar	01-17	02-05-01	
60.	Sharafat Khan	Class-IV	21.02.84	01.01.2008	10 th	SP Invest: Battal	01-10	02.04.19	
61.	Hazrat Sher	Class-IV	20-05-76	08-01-2008	10 th	DPO Mardun	00-05	02-04-18	
62.	Ahmad Ali	N/Q	15-3-85	18-1-2008	F.A	SP Invest: Mardun	01-17	02-04-01	
63.	M.Adil	N/Q	03-05-87	14-02-2008	10 th	Special Branch	00-03	02-02-28	
64.	Hadi Muhammad	Water Carrier	22.04.84	13.03.2008	10 th	FRP Kohat	01-07	02.02.07	

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	Name	Rank	D.O.B	Date of Enlistment	Education	Present posting	Age (YY-MM-DD)	Total Service (YY-MM-DD)	Remarks
65.	Fazle Zaman	N/Q	09.02.80	08.04.08	D.com	DIG Kohat Range	30.03.19	02.01.20	
66.	Muhammad Javed	Daftari	21.09.77	08.04.2008	10 th	DIG Bannu	31.07.22	02.01.05	
67.	Sanaullah	Class-IV	20.04.87	19.07.2008	FA	FRP/Hqrs Peshawar	23.02.2001	01.11.11	
68.	Saeed ur Rehman	Class-IV	11.03.88	21.7.2008	10 th	FRP/Hqrs Peshawar	22.03.11	01.11.01	
69.	Liaqat Ali	Class-IV	07.03.86	29.7.2008	10 th	FRP/Hqrs Peshawar	24.03.14	01.10.23	
70.	Muhammad Shahid	N/Q	12.12.82	26.07.2008	10 th	Hazara Region	27.05.01	01.10.01	
71.	Majid	Class-IV	15.04.82	23.08.2001	10 th	FRP/Hqrs Peshawar	28.02.07	01.10.00	
72.	Waheed Ahmad	Daftari	02-04-82	16-07-2008	M.A	DPO Tank	28-1-11	01-09-28	
73.	Safreen	N/Q	05-04-84	17-07-2008	10 th	DIG Hazara	28-01-8	01-09-27	
74.	Kaleemullah	N/Q	10.03.90	24.07.2008	10 th	DPO Bannu	29.02.07	01.09.24	
75.	Shafaq ur Rehman	Daftari	13-03-80	02-08-2008	10 th	DPO Lakki	30-02-07	01-09-18	
76.	Shaukat Ali	N/Q	19-02-78	22-07-2008	F.A	DPO Swabi	31-02-25	01-09-11	
77.	Muhammad Ikram	Chowkidar	24.02.86	02.09.2008	10 th	SP Invest. Bannu	31.02.24	01.08.15	
78.	Ejaz Ahmed	Mason	01-12-83	01-11-2008	10 th	RTW Manshera	30-05-12	01-06-12	
79.	Farhan Farid	N/Q	15-10-82	02-03-2009	10 th	DPO Abbottabad	30-06-28	01-02-09	
80.	Zulfiqar	Class-IV	25-12-79	17-10-2009	10 th	DIG Hazara	30-04-29	00-06-27	

Atc B

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Merit list of the Class-IV in Typing Test

S.NO:	Name & Designation	Place of Posting	Marks Obtained
1.	Asghar Alam	Special Branch	40
2.	Sanaullah	FRP/HQ Peshawar	38
3.	Fazle Zaman	DIG/Kohat	35
4.	Ahmad Ali	Investigation Mardan	34
5.	Irfanullah	DIG/Kohat	25
6.	Muhammad Adil	Special Branch	20
7.	Ajmal Khan	CPO Peshawar	15
8.	Hardeep Kumar	DIG/Malakand	14
9.	Abdul Majeed	DPO/Kohistan	13
10.	Rahman Ullah	DPO/Bannu	13
11.	Niaz Wali	DIG/Kohat	12
12.	Muhammad Javid	DIG/Bannu	12
13.	Qaisar Farooq	DPO/Abbottabad	12
14.	Shaukat Ali	DPO/Swabi	12
15.	Amir Pervez	CCP Peshawar	11
16.	Haider Ali	Investigation Mardan	11
17.	Muhammad Kamran	DPO/DIKhan	10
18.	Sharafat Khan	SP/Investigation Battagram	10
19.	Adil Khan	DIG/Hazara	9
20.	Muhammad Arif	DPO/Mardan	9
21.	S. Bidar Shah	RTW Mansehra	9

1. Mr. Sajid Ali Khan DIG/HQrs.
(Chairman)
2. Mr. Jaffar Khan AIG/Estt:
(Member)
3. Mr. Malik Ur-Rehman AIG/Legal
(Member)
4. Mr. Abdul malik khan Registrar
(Member)

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Apprs 07/6/11

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بعدالت سرٹیفکیٹ کی کاپی

0332-9731676
P.C. no 1046-05

2022ء منجانب
سٹیز ان بنام حکومت

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئٹم

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام پشاور کیلئے اسٹریٹجی کے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو رضی نامہ کرنے و تقرر ثالثہ فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

ACCEPTED BY

ASL

2022

ماہ

الرقوم 2022/104

واہ العی

کے لئے منظور ہے۔

شاعر

بمقام

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR


SHER ZADA

VS

REGIONAL POLICE AND OTHERS

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Appellant

Through

Counsel 

Israr Ahmad

Advocate High Court

Peshawar

BEFORE THE KHYBER PAKHTOONKHA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No.2018

Sher Zada Naib Qasid SP, Investigation, District Buner.....(Appellant)

VERSUS

Khyber Pakhtunkhwa Service Tribunal

1. The Regional Police Officer, Swat.

2. The District Police Officer, Buner

3. Provincial Police Officer K.P.K, Peshawar. *Junior clerk*

4. Muhammad Fazil S/O Muhammad Ashraf (D.P.O) Office Buner. *Junior clerk*

5. Asghar Alam, Special Branch Malakand Region, *through DPO, District Buner*

6. Sanullah of FRP / HQ rs Malakand Region *through DPO, Muzaffargarh/Swat*

7. Fazle Zaman of D.I.G Kohat Region *through DPO, Kohat.*

8. Ahmad Ali of investigation Mardan Malakand Region *through DPO, Mardan.*

9. Ifranullah of D.I.G Kohat Region. *through DPO, Kohat.*

10. Haider Ali Class IV S.P investigation Mardan, *through DPO, Mardan.*

11. Adil Khan Naib Qasid D.I.G Hazara *through DPO, Abbottabad.*

12. Muhammad Kamran D.P.O, D.I.Khan, *through DPO, DI Khan.*

13. S. Bakht Baidar Shah RTW Mansehra, *through commandant Police*

14. Ifranullah D.I.G Kohat *through DPO, Kohat*

15. Qaisar Farooq D.P.O Abatbad *through DPO, Kohat.*

16. Sharafat Khan S.P Investigation Batagram *through DPO, Kohat.*

17. Ahmad Ali S.P investigation Mardan, *through DPO, Kohat.*

18. M. Adil Special Branch Hazara *through DPO, Kohat.*

19. Muhammad Javed D.I.G Bano *through DPO, Kohat.*

20. Shaukat Ali D.P.O Sawabi.(Respondents)

Diary No. 169

Date: 8/2/2019

Mingawasa

Khyber Pakhtunkhwa Service Tribunal

SERVICE APPEAL UNDER SECTION -4 OF THE KHYBER PAKHTOONKHA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 03-08-2010 AND 25-08-2010 and order Dated 23-02-2014 WHERE IN SOME OF THE NAIB QASIDS AND DAFTARIES WHO WERE NOT ON THE STRENGTH OF DISTRICT POLICE FORCE BUNER HAVE BEEN PROMOTED / APPOINTED AS JUNIOR CLERK AGAINST THE RESERVE QUOTA OF 33% SPECIFICALLY ALLOCATED FOR THE NAIB QASID / DAFTARIED ETC OF BUNER WHICH IS AGAINST THE POLICY AND RULES.

Filed-to-day
Registrar
8/2/19

PRAYER:

On acceptance of the instant appeal, this Honorable Tribunal may graciously be pleased to set aside the impugned orders of promotion to the extent of those, who were not domiciled / resident of District Buner, but have been appointed / promoted on the strength of posts of Junior clerks specifically reserved for District Buner under the policy and direct the respondent to promote the appellant on the same post (junior clerk) under rules, law and policy with all attached benefits from the date of impugned promotion.

Respectfully Sheweth!

Facts giving rise to the present appeal are as Under:-

1. That appellant is the employee of District Police Force Buner and presently Serving as Naib Qasid in the office of SP Investigation, Buner. He has got more than 4 years Service at his credit with un blemish Service record.
2. That appellant is at Serial No. 1 of the Matriculate Naib Qasid at District Buner. (Annexure A).
3. That vide letter No. 1896-915 Dated 04-05-2010, 18517-27 Dated 03-08-2010 Letter No. 5047-80 Dated 23-02-2014, order No. 19890 Dated 25-08-2010 from the office of Inspector General of Police Government of Khyber Pakhtoonkhwa addressed to CCP, Commandant FRP, Officer of CPO and all DPOs, wherein all the concerned were directed to submit the list of those Naib Qasids, who are Matriculate and having two year Service at their credit so as to process their cases for promotion against their reserve quota of Junior clerks of each District. (Annexure B).

4. That it is pertinent to mention here that there were total 09 vacancies of Junior Clerk falling under the reserved Quota of 33% (departmental promotion) in the District Buner out of which 05 seat were laying vacant in the office of SP-Investigation and 04 were laying vacant in the office of DPO, Buner (Annexure C).
5. That it is also pertinent to mention here that office of DPO, Buner recommended and submitted 03 names of Naib Qasid and other class VI employees having requisite qualifications and eligibility including the name of the appellant for promotion /appointment against the reserve quota of 33% before the concerned quarter. (Annexure D).
6. That as per criteria and as per prescribed procedure there was no need of test and interview for the reason that the subject post were to be filled under the principle of seniority / fitness, whoever, test and interview was conduction on both occasions and appellant along with others participated. *(copy of petty is attached as Anx - E)*
7. That as per rules the reserved promotion quota was to be filed from among the candidates on seniority / Fitness basis who having domicile of native District and serving in the District, where the vacancies had accrued.
8. That appellant was at the top of seniority list of Naib Qasid and class IV employees in District Buner and was also qualified and eligible as per criteria (Annexure E) but was ignored blue eyed chap (Annexure F), who were not on the strength of police Force, Buner were appointed and promoted against the reserved quota of departmental promotion specifically allocated for the candidates of Police personnel District, Buner.

(Annexure G) but with no response, hence statutory period has been elapsed, therefore having no other adequate and efficacious remedy, assails the same through the instant service appeal inter alias on the following grounds:-

GROUND:-

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article, 4 of constitution of the Islamic Republic of Pakistan, 1973. Appellant was at the top of seniority list of District Buner and was also qualified and eligible as per criteria have denied of due right, which is against the subject policy and rules, therefore the impugned process of promotion and appointment was nullity in the eyes of law and this Court has jurisdiction to interfere with the sack of justice, fairness and equity.
- B. That total of 09 vacancies of Junior clerk were available in District Buner, and 2 post were filled and the reaming post have been held reserved vacant against which appellant could be easily accommodated, but in spite of the hectic efforts, appellant has been ignored and blue eyed chap of political figures belonging to other districts were appointed / promoted against the quota of District Buner.
- C. That all powers are in the nature of Trust and public functionaries must act as repository of such trust, but in the instant case misfortunately the public Trust has been violated, the same is / was not only unwarranted but also undesirable.

been violated, the same is / was not only unwarranted but also undesirable.

D. That Respondents No. 4 to 20 are junior to appellant so the Respondents No. 1 to 3 clearly violated policy on subject.

E. That the appellant moved appeal before respondent No. 1 in the lights of judgment / order of this august tribunal Dated 04-07-2018 but the appeal not been decided yet this Appeal lies before this August Tribunal copy of appeal and judgment/ order dated 04-07-2018 as (**Annexure** ^{H & I} ~~1 & 2~~).

F. That appellant would like to seek the permission of this Honorable Tribunal to advance some more grounds at time of arguments.

It is therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in circumstances of the case, not specifically asked for, may also be granted to the appellant,

Sher Zada
Appellant

Through *Israr Ahmad*

Dated: _____/ 10/ 2018

Israr Ahmad
Advocate High Court / *Distt Courts Daggan Buner.*

AFFIDAVIT

I, Sher Zada Naib Qasid SP, Investigation, District Buner do hereby solemnly affirms on Oath that the contents of the instant Service appeal are correct to the best of my knowledge and belief.

Sher Zada
Deponent
TESTED
Anwar Zeb Advocate
Oath Commissioner
Peshawar
16-5-19