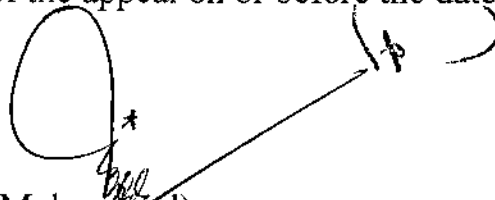



07.12.2022



Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant sought time for preparation of arguments. Adjourned. To come up for arguments on 26.01.2023 before D.B. Learned counsel for the appellant is directed to provide second copy of the appeal on or before the date fixed.

SCANNED
KP&T
Peshawar


(Mian Muhammad)
Member (E)

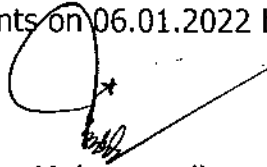

(Salah-ud-Din)
Member (J)

26-1-23 proper DB is not available,
The case is ~~not~~ ^{is} Adjourned to 8-5-2023


Reader

06.10.2021

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith Ibrahim Shah, Superintendent for the respondents present.

Without intending to make any opinion, we deem it proper to direct for completion of the record that the respondents should place on file explicit information as to whether six posts at the time of retirement of the appellant were vacant or not; and if vacant, whether any panel was proposed through proper Working Paper for promotion on the said post before or after the retirement of the appellant. Case to come up for the said needful and arguments on 06.01.2022 before the D.B.



(Mian Muhammad)
Member(Executive)

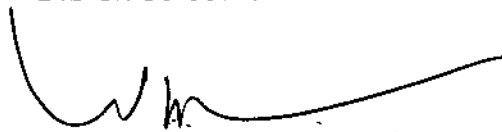


Chairman

06.01.2022

Clerk to counsel for the appellant present. Mr. Javed Ullah, Assistant AG for the respondents present.

~~Atiqur Rehman~~ requested for adjournment on the ground that ~~the~~ counsel is not available today, due to general strike of the bar. Adjourned. To come up for arguments before the D.B on 30.03.2022.



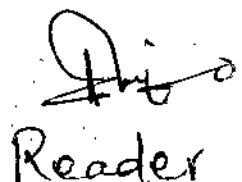
(Atiqur-Rehman Wazir)
Member(E)



Chairman

30-3-2022

Proper DB not available the case is adjourned to come up for the same as before on 30-3-2022



Reader

21.12.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present. Due to COVID-19, the case is adjourned to 12.03.2021 for the same.


Reader

12.3.21

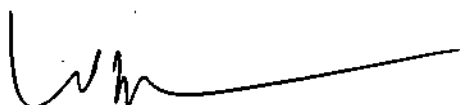
D.B is not available, therefore the case is adjourned to 16.6.2021 for the same.




16.06.2021

Appellant alongwith his counsel Mr. Abid Ali, Advocate, present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant submitted rejoinder, which is placed on file and sought time for arguments. Adjourned. To come up for arguments before the D.B on 07.10.2021.


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


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

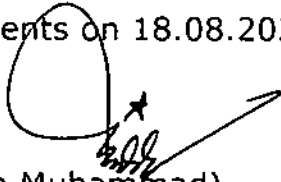
16/06/2021

16/06/2021

Handwritten notes at the bottom of the page, partially illegible.

09.06.2020

Junior counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Junior counsel for the appellant seeks adjournment on the ground that learned senior counsel for the appellant is not available today. Member copy of the instant service appeal is also not available on record. Learned counsel for the appellant is directed to furnish member copy of instant service appeal on or before next date. To come up for arguments on 18.08.2020 before D.B.



(Mian Muhammad)
Member



(M. Amin Khan Kundi)
Member

18.08.2020

Due to summer vacations, the case is adjourned to 26.10.2020 for the same.



Reader

26.10.2020

Proper D.B is on Tour, therefore, the case is adjourned for the same on 21.12.2020 before D.B.

2/3



Reader

01.01.2020

Learned counsel for the appellant present. Mr. Riaz Paindakhel learned Assistant Advocate General alongwith Mr. Ibrahim Shah Superintendent for the respondents present and submitted written reply which is placed on file and seek adjournment.. Adjourned. To come up for rejoinder if any and arguments on 13.02.2020 before D.B.



(Hussain Shah)
Member



(M. Amin Khan Kundi)
Member

13.02.2020

Junior counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel is busy in the Hon'ble Peshawar High Court, Peshawar and cannot attend the Tribunal today. Adjourned to 30.03.2020 for arguments before D.B.



(Hussain Shah)
Member



(M. Amin Khan Kundi)
Member

01.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 09.06.2020 for same as before.



Reader

12.09.2019

Appellant in person and Addl. AG on behalf of the respondents present.

Learned AAG seeks further time to procure parawise comments from the respondents. Adjourned to 07.10.2019 on which date the requisite reply/comments shall positively be submitted.

Chairman 

07.10.2019

Appellant in person present. Nemo for the respondents.

Fresh notices be issued to the respondents. To come up for written reply/comments by way of last chance on 07.11.2019 before S.B.

Chairman 

07.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Ibrahim Shah, Superintendent for the respondents present.

Respondents have not furnished the requisite reply/comments despite last opportunity. The appeal is posted for arguments before D.B on 01.01.2020.

Chairman 

1456/18

11.06.2019

Counsel for the appellant present.

It is contended by learned counsel that the appellant was appointed in the Police Department in the year 1986 and in due course was promoted as Sub Inspector on 2.11.2016. By virtue of his confirmation to the said rank and seniority amongst the Sub Inspectors the appellant was entitled for promotion to the rank of Offtg. Inspector and inclusion in list "F", however, his case was not sent in time for consideration by the competent authority. The appellant retired on 08.09.2018 on reaching superannuation and submitted a departmental appeal on 02.10.2018. The appeal was turned down on the sole ground that no promotion could be allowed after retirement. It was added by learned counsel that the case of appellant was worth consideration for proforma promotion even after his retirement, therefore, the rejection of his departmental appeal was ill-founded.

Instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 25.07.2019 before S.B.

Appellant Deposited
Security & Process Fee

25/6/19


Chairman

25.07.2019

Appellant in person and Mr. Usman Ghani, District Attorney for the respondents present.

Learned District Attorney requests for further time in order to procure reply from the respondents. To come up for written reply/comments on 12.09.2019 before S.B.

Chairman 

19.02.2019

Appellant alongwith Mr. Muhammad Aftab Advocate
Junior counsel for the appellant present.


Junior to counsel for the appellant requests for
adjournment as senior counsel for the appellant is not in
attendance due to indisposition.

Adjournd to 21.03.2019 before S.B.


Chairman

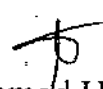
21.03.2019

Nemo for the appellant. Due to general strike of the bar,
the case is adjourned. To come up for preliminary
hearing on 23.04.2019 before S.B.


Member

23.04.2019

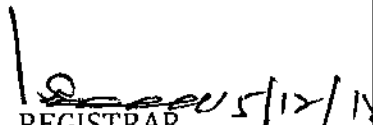


Appellant in person present. Due to general strike of the
bar, the case is adjourned. Case to come up for preliminary
hearing on 11.06.2019 before S.B.


(Ahmad Hassan)
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1456/2018


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/12/2018	<p>The appeal of Mr. Fazal Ghafoor resubmitted today by Mr. Abid Ali Advocate 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>
2-	07/12/2018	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/01/2019</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	08.1.2019	<p>Nemo for appellant.</p> <p>Notices be issued to appellant/counsel for 19.02.2019 for preliminary hearing before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Fazal Ghafoor Sub-Inspector posted as police School of Telecommunication peshawar received today i.e. on 23.11.2018 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1✓ Memorandum of appeal may be got signed by the appellatant.
- 2✓ Annexures of the appeal may be attested.
- 3✓ Annexures of the appeal may be flagged.
- 4✓ One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2277 /S.T,

Dt. 23/11 /2018.


REGISTRAR 23/11/18
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Abid Ali Adv. Pesh.

*Sir, Complete with in all Respect
Put up before the Court*

(A)

5/12/18

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No. 1456 /2018

Fazal Ghafoor Appellant

Versus

Inspector General of Police, KPK, Peshawar & others..... Respondents

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8.	Copy of letter dt.16.08:2018	11
9.	Copy of notification.	12
10.	Copy of letter dt.5.4.2018	13
11.	Copy of application dt.21.03.2018	14
12.	Copy of application dt.7.2.2018	15
13.	Copy of application dt.12.10.2017.	16
14.	Copy of letter dt.10.10.2017	17
15.	Copy of combined seniority list	18
16.	Copy of seniority list of RM cadre	19
17.	Copy of proposed combined seniority list of police telecomm	20

S.No.	Description of documents.	Pages.
18.	Copy of list of sub inspectors of Telecommunications.	21
19.	Copy of letter dt.20.07.2016	22
20.	Copy of letter dt.8.9.2016	23
21.	Copy of notification dt.30.09.2016	24-25
22.	Wakalatnama\,	26

Appellant

Through

Abid Ali
Advocate, Peshawar.

Dated:

(C)

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No. 1456 /2018

Fazal Ghafoor, Sub Inspector.

Posted as Police School of Telecommunication

Peshawar.....Appellant

Versus

- 1) Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2) Deputy Inspector General of Police Telecom , Khyber Pakhtunkhwa, Peshawar.
- 3) Chief Capital Police Officer, Peshawar.
- 4) Additional Inspector General of Police, Headquarters, KP, Peshawar.

..... Respondents

APPEAL U/S 4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
ORDER DATED 25.10.2018 THROUGH
WHICH THE DEPARTMENTAL APPEAL/
REPRESENTATION FILED BY THE
APPELLANT FOR HIS PROMOTION WAS
DISMISSED.

Prayer:

On acceptance of this appeal, the order dated 25.10.2018 may graciously be declared against law, rules, principles of natural justice and may be set aside with the directions to the respondents to promote the appellant as Adhoc Inspector.

2

Respectfully Sheweth;

- 1) That the appellant was appointed as Wireless Technician in Police department Telecommunication on 10.11.1976.
- 2) That appellant has passed all the courses for promotion as per terms and conditions of Tele Unit.
- 3) That the appellant has to reach to the age of superannuation (60 years)
- 4) That the appellant's service record is smooth well from his appointment (42 years), no single complaint is there, against the appellant.
- 5) That the appellant is now posted as Principal Police School Telecommunication and teaching ASIs and HCs course.
- 6) That there are six posts of Inspectors are lying vacant since June, 2017 in Tele Unit and the petitioner is senior most inspector as per seniority list of Tele unit and confirmation of the appellant has been made on 02.11.2016.
- 7) That the appellant time and again applied for his promotion since November, 2017 as well as personally requested the highups, in the meanwhile. recommendation letter No.4103/Tele/OS dated 25.04.2018 was issued as inspector as well as in Police Policy Board Meeting dated 03.05.2018 one year relaxation has been given to the appellant vide which the appellant is suitable candidate for the post of Adhoc inspector.
- 8) That the appellant submitted departmental appeal/ representation on 02.10.2018, which was dismissed on 25.10.2018.



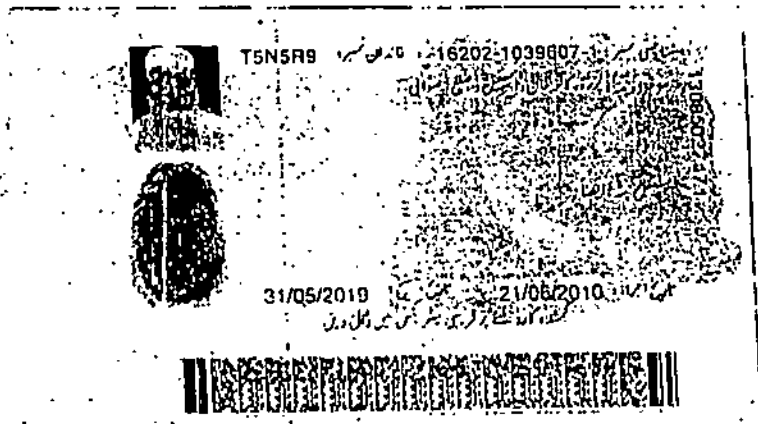
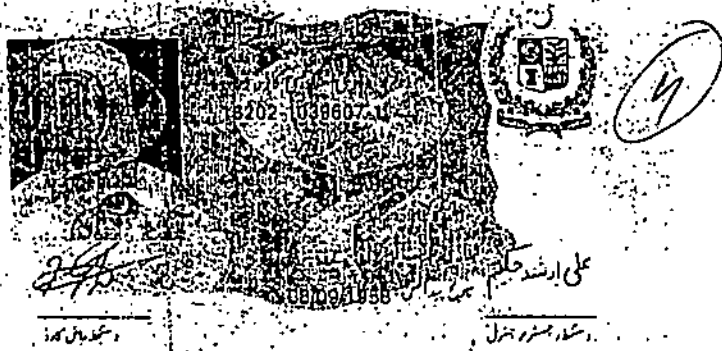
- 9) That the very refusal of the respondents to promote the appellant as anti-dation promotion/ retrospective promotion is against law and facts.

It view of above facts, it is, therefore, humbly prayed that keeping in view the 42 years service of the appellant may kindly be promoted as Adhoc Inspector.

Appellant

Through.

Abid Ali
Advocate, Peshawar.



(5)

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2018

Fazal Ghafoor.....Appellant

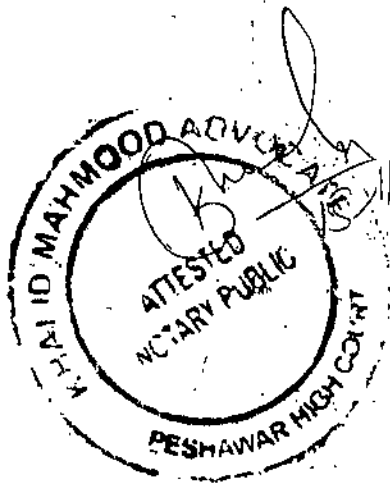
Versus

Inspector General of Police, Khyber Pakhtunkhwa,
Peshawar..... Respondents

AFFIDAVIT

I, Fazal Ghafoor, Sub Inspector Posted as Police School of Telecommunication Peshawar do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


Deponent



16202-1039607-1



BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2018

Fazal Ghafoor.....Appellant

Versus

Inspector General of Police, Khyber Pakhtunkhwa,

Peshawar..... Respondents

ADDRESSES OF ADDRESSES OF THE PARTIES

APPELLANTS:

Fazal Ghafoor, Sub Inspector

Posted as Police School of Telecommunication

Peshawar

RESPONDENTS:

- 1) Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2) Deputy Inspector General of Police Telecom , Khyber Pakhtunkhwa, Peshawar.
- 3) Chief Capital Police Officer, Peshawar.
- 4) Additional Inspector General of Police, Headquarters, KP, Peshawar.

Appellant

Through

Abid Ali

Advocate, Peshawar.



7

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

No. 368 / CPB, dated Peshawar the 25 / 10 / 2018

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

Subject: DEPARTMENTAL APPEAL/REPRESENTATION.

Memo:- Sub-Inspector Fazal Ghafoor (Retired) of Telecommunications submitted an application regarding his promotion to the rank of Offg: Inspector.

According to record, the applicant has been retired from service on 08.09.2018 after attaining the age of superannuation.

In this connection, it is submitted that there is no provision in rules for promotion after retirement, therefore, his request is not maintainable under the rules, hence his application has been filed by the Competent Authority.

The applicant may be informed accordingly.

(ZAIB ULLAH KHAN) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

ATTESTED

8

From : The Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

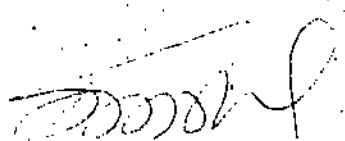
To : The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. 9899 /Tele/OS, dated Peshawar the 5 1 9 /2018.

Subject: RECOMMENDATION FOR PROMOTION TO LIST "F" AND
CONSEQUENT PROMOTION TO THE RANK OF INSPECTOR
VACANCY POSITION OF INSPECTORS.

Memorandum:

In continuation of this office letter No.9768/Tele/OS, dated 03.09.2018, it is submitted that 08 posts of Inspector are lying vacant in Police Telecommunication Unit please.


Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

ATTESTED.

(9)

From : The Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

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

No. 9768 /Tele/OS, dated Peshawar the 3 1 9 /2018.

Subject: RECOMMENDATION FOR PROMOTION TO LIST "F" AND
CONSEQUENT PROMOTION TO THE RANK OF INSPECTOR.

Memorandum:

Please refer to this office Letter No.4103/Tele/OS, dated 05.04.2018
on the subject cited above.

Sub Inspector Fazal Ghafoor of this unit may please be brought on
Promotion List "F" and subsequent promotion to the rank of Inspector on a special
case due to rendering meritorious service as the officer concerned is going to
retire on 08.09.2018 on attaining the age of superannuation.

Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

FL

ATTESTED

10



جناب عالی۔

گذارش ہے کہ سائل محکمہ پولیس ٹیلی کمیونیکیشن میں مورخہ 10-11-1976 کو بحیثیت وائرس ٹیکنیشن بھرتی ہوا۔
بنیادی کورس لیکچر ٹیلی یونٹ کے قواعد و ضوابط کے مطابق پروموشن کے لئے تمام مروریہ کورسز مکمل کر کے پاس کئے ہوئے ہیں۔
سائل 08-09-2018 کو 60 سال تک ہونے کا ہے۔ سائل نے محکمہ پولیس ٹیلی یونٹ میں تقریباً 42 سال کی سروس کے دوران آفسران
لا کو کسی قسم کی شکایت کا موقع نہیں دیا ہے اور اپنی ڈیوٹی ایمانداری سے کر رہا ہے۔ اب بھی سائل پولیس سکول آف ٹیلی کمیونیکیشن میں بطور
پرنسپل تعینات ہے اور HCs, ASIs اور کنسٹیبلان پر مشتمل کلاس کو ایڈوانس الیکٹرانکس / کمیونیکیشن سسٹم پر کورس دے رہا ہے۔

2۔ جناب عالی ٹیلی یونٹ میں ماہ جون 2017 سے کم از کم 6 اسپیکٹرز کی آسامیاں خالی پڑے ہیں چونکہ سائل ٹیلی سینیاریٹی لسٹ کی رو
سے سب سے سینئر سب اسپیکٹر ہے۔ اور سائل کی کنفرمیشن 02-11-2016 کو ہو چکی ہے۔

3۔ سائل نے اسپیکٹر پروموشن کے لئے ماہ نومبر 2017 سے اب تک کئی بار آفسران بالا کو درخواست اور ساتھ ہی روبرو پیش ہو کر
استدعا کر چکا ہے۔ اسی اثنا بحوالہ چھٹی نمبر 4103/Tele/OS بتاریخ 25-04-2018 کو DIG ٹیلی صاحب نے ریکمنڈیشن بطور
انسپیکٹر آپ کی خدمت میں ارسال کیا ہے اور ساتھ ہی پولیس پالیسی بورڈ میٹنگ بتاریخ 03-05-2018 میں ٹیلی یونٹ کو ایک سال کی
رعایت بھی دی گئی ہے جس کی رو سے سائل بطور ایڈھاک انسپیکٹر کے لئے موزوں ترین ہے۔ اسلئے استدعا کی جاتی ہے کہ سائل کی 42 سالہ
نوکری کو مد نظر رکھ کر سائل کو ایڈھاک انسپیکٹر پروموٹ کرنے کا حکم صادر فرمائیں۔ سائل دعا گور ہے گا۔

نوٹ:- تمام دستاویزات کے فوٹو کاپی لف درخواست ہے۔

SP/Tele
SP/MT
Dy Dir/Tele
DS/MT
DS/Tele
Off. Tele
PA
Asstt/Tele
SRC/Tele
OAS/Tele
Encl. to/Tele
AC/Tele
GS
Penman/ Clerk

العارض

سب انسپیکٹر فضل غفور متیعہ پولیس سکول آف ٹیلی کمیونیکیشن پشاور

ATTESTED

DIG/Tele

(11)

Tel: No.091-9210381
Fax: No.091-9210638

From : The Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

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

No. 9177 /MT, dated Peshawar the 16 / 8 /2018.

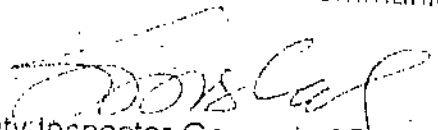
Subject: REQUEST FOR PROMOTION TO THE RANK OF INSPECTOR.

Memorandum:

Enclosed please find herewith an application which is self-explanatory along with related documents submitted by Sub Inspector Fazal Ghaffor of this unit for favorable consideration please.

As per decision taken in the 36th Police Policy Board meeting, dated 03.05.2018, the promotion rules as given in the amended Police Rules are applicable after 31.07.2019.

He has already been confirmed in the rank of Sub Inspector and is eligible to be enlisted in the "F" list maintained for officers of Telecommunication.


Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

ATTESTED

19

Tel: No.091-9210381
Fax: No.091-9210638

From : The Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

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

No. **4103** /Tele/OS, dated Peshawar the **5** **1** **4** /2018.

Subject: RECOMMENDATION FOR PROMOTION TO LIST "F".

Memorandum:

Please refer to this office Letter No.244/EC, dated 19.01.2018 on the subject cited above. *(Copy enclosed for ready reference)*

An application submitted by Sub Inspector Fazal Ghafoor for placing his name in Promotion List "F" and subsequent promotion to the rank of Inspector is enclosed herewith for kind consideration as the applicant is going to retire on 08.09.2018 on attaining the age of superannuation.



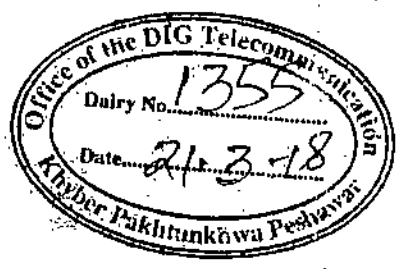
Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

ATTESTED

14

جناب عالی!

گزارش ہے کہ سائل پولیس ٹیلی کمیونیکیشن میں مورخہ 10.11.1976 کو بحیثیت ڈائریل میکنگ بھرتی ہوا۔ ایک سال بنیادی الیکٹرونکس کورس پولیس ڈائریل ٹریننگ سکول قربان لائن لاہور سے پاس کیا۔ جس کے بعد سائل نے مزید درج ذیل کورسز کئے۔



- ۱۔ انٹر کام کورس: پی ٹی سی ایل سکول پشاور۔
- ۲۔ جیمر کورس: نیشنل پولیس بیورو اسلام آباد۔
- ۳۔ ٹیٹر کورس: نیشنل پولیس بیورو اسلام آباد۔

سائل بدوران سردس ڈیپارٹمنٹل پروموشن کے لئے ٹیلی کمیونیکیشن کے قواعد کے مطابق تمام کورسز مکمل کر کے پاس کر چکا ہے۔ سائل بحیثیت سب انسپکٹر 02.11.2016 کو کنفرم ہو چکا ہے۔ سائل سے پہلے تین سب انسپکٹر (شیرولی، شمشیر خان وغیرہ) مورخہ 31.07.2016 کو کنفرم ہو چکے تھے۔ اور لسٹ F کے لئے ان کا کیس مورخہ 23.08.2016 کو CPO بھیجوا گیا۔ CPO نے ان کو لسٹ F پر لانے کے بعد انسپکٹرز کے عہدوں پر موٹ کئے اور اب وہ ریٹائرڈ بھی ہو چکے ہیں، لیکن سائل مورخہ 02.11.2016 پر کنفرم ہو کر لسٹ F کے لئے کیس CPO نہیں بھیجوا گیا۔ جس کی وجہ سے سائل بروقت لسٹ F پر پروموٹ نہ ہو سکا۔ لہذا افدوی نے لسٹ F پر پروموشن کے لئے مورخہ 12.10.2017 پر درخواست جمع کیا، جس کے کاپی لف درخواست ہے، لیکن اس پر بھی کوئی کارروائی عمل میں نہیں لائی گئی۔ حالانکہ سائل پولیس ایکٹ 2017 نافذ العمل ہونے سے پہلے کنفرم ہو چکا ہے۔ جس کا اطلاق سائل کے پروموشن پر لاگو نہیں ہے۔ اب چونکہ سائل کا عمر مورخہ 08.09.2018 کو 60 سال تک ہونے کو ہے۔ اور ریٹائرمنٹ میں صرف 05 مہینے باقی ہیں۔ حکمہ ہذا میں انسپکٹرز آسامیاں خالی پڑی ہیں۔

لہذا استدعا کی جاتی ہے۔ کہ سائل کو لسٹ F پر لانے اور انسپکٹر عہدے پر پروموشن دینے کا حکم صادر فرمایا جاوے۔ سائل تازیت دُعا گور ہے گا۔

SP/Tele
SP/MT
Dy Dir/Tele
DSP/MT
DSP/Tele
OS/Tele
PA/
Acctt/Tele
SRC/Tele
OASI/Tele
E/Branch/Tele
ACR/Clerk Tele
GSI/Tele
Pension Clerk

العارض

SI فضل غفور پولیس سکول آف ٹیلی کمیونیکیشن پشاور۔

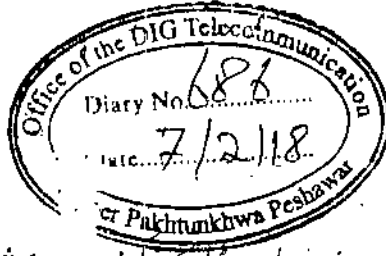
مورخہ 21.03.2018

DIG/Tele

ATTESTED

Please call him
OR
CPO to be approached for the purpose

3/4



15

جناب عالی!

گزارش ہے کہ سائل پولیس ٹیلی کمیونیکیشن میں بحیثیت سب انسپکٹر وائرس مکینک ڈیوٹی سرانجام دے رہا ہے۔ اب تک سائل جن کورسز کیلئے چنا گیا تھا جن میں پی ٹی سی ایل سکول پشاور سے انٹر کام کورس، اسلام آباد سے جبر کورس اور نیشنل پولیس بیورو اسلام آباد سے میٹرک کورس پاس کر چکا ہے۔ اس طرح بحیثیت جبر انسپکٹر سپیشل برانچ میں ڈیوٹی سرانجام دے چکا ہے اور اب بحیثیت انچارج پولیس سکول آف ٹیلی کمیونیکیشن میں ڈیوٹی سرانجام دے رہا ہے۔ اور ریکورڈس کو تھیوری / پریکٹیکل طور پر تربیت دے رہا ہے۔ سائل بحیثیت سب انسپکٹر مورخہ 02.11.2016 کو کنفرم ہو چکا ہے اور سناریائی کے اعتبار سے سب سے سینئر سب انسپکٹر ہے۔ اس وقت سائل کا کیس برائے لسٹ "ایف" سی پی او کو ارسال نہیں کیا گیا اس لئے سائل بروقت لسٹ "ایف" پر نہ آسکا۔ بعد میں سائل نے خود مورخہ 12.11.2017 پر لسٹ "ایف" کیلئے درخواست دے چکا ہے لیکن اس پر بھی کوئی کارروائی عمل میں نہیں لائی گئی۔ (درخواست کا پی لف درخواست ہے)۔ اب چونکہ سائل کا عمر مورخہ 08.09.2018 کو 60 سال تک ہونے کو ہے اور ریٹائرمنٹ میں صرف 07 مہینے باقی ہیں۔ محکمہ ہذا میں انسپکٹر ز کے آسامیاں خالی پڑی ہیں۔

لہذا استدعا ہے کی جاتی ہے کہ سائل کا پروموشن کیس زیر غور فرمایا جائے۔

بندہ دعا گو ہے گا۔

مورخہ 07.02.2018

ارض

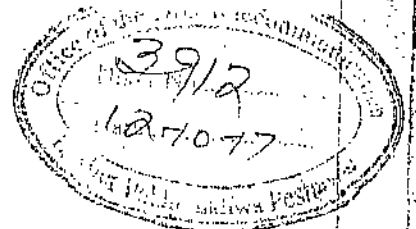
SP/Tele
SP/MT
Dy Dir/Tech
DSP/MT
DSP/Tele
OS/Tele
PA/
PSO/
Acct/Tele
S.../Tele
G.../Tele
Eranch/Tele
ACR/Clerk Tele
GSI/Tele

سائل فضل غفور سب انسپکٹر پولیس سکول آف ٹیلی کمیونیکیشن پشاور

ATTESTED

DIG/Tele

18



R/sir,

With due respect that your kind attention is invited that the CPO has sought the following information /document of those Sub Inspector Police Telecommunication whose name have already brought on list "F" vide CPO letter No. 826/CPB dated 10.10.2017 copy enclosed for ready reference.

In this connection it is submitted that my name is placed in the seniority list of confirmed sub Inspector Telecommunication serial No.5 and also confirmed in the rank of Sub Inspector with effect from 02.11.2016 vide order No. 2816-22/Tele/OASI dated 06.03.2017 (Copy enclosed).

It is therefore, requested that my name may kindly be considered for promotion list "F" on compassionate ground, because I am going to be retired from service with effect from 08.09.2018 on superannuation bases.

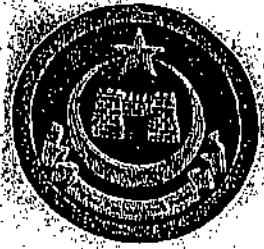
SI Fazali Ghafoor
Police School of Telecommunication
Peshawar

Dated 12.10.2017.

Tele
4T
Dir/Tech
/MT
Tele
Tele

/Tele
Tele
/Tele
inch/Tele
Clerk Tele
Tele

ATTESTED



17

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR

No. 826 / CPB, dated Peshawar the 10 / 10 / 2017

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


Subject: INFORMATION REGARDING SUB-INSPECTORS (BS-14) OF
TELECOMMUNICATIONS ALREADY ON LIST "F"

Memo:-

Please furnish the following information/documents regarding
Sub-Inspectors (BPS-14) of Telecommunications already on List "F" serving in your Unit
immediately:-

- i. Vacancy Position
- ii. Present Posting
- iii. Five years complete ACRs (From 2012 to 2016)
- iv. No Departmental Enquiry Certificates
- v. Detail of Punishment, if any
- vi. Seniority List

S.NO.	NAME
1.	SI Faridullah
2.	SI Shamsher Khan
3.	SI Zahir Badshah
4.	SI Sher Wali


(ARIF SHAHBAZ KHAN) PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.
9/10/2017

Endst: No. and dated even

Copy forwarded to the:-

1. Addl: Inspector General of Police, Headquarters, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQrs., Khyber Pakhtunkhwa, Peshawar.
3. PSO to Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
4. Registrar, CPO Peshawar.
5. Supdt: Secret to provide synopsis to Career Planning Branch.
6. Supdts: Establishments-II & III, CPO Peshawar.

ATTESTED

COMBINED SENIORITY OF SUB INSPECTORS

S/No.	RANK / NAMES	Distt:	Edu	D.O.B	D.O.A	Trade	D.O.P as ASI	D.O.P List "E"	D.O.P as SI	D.O.C as SI	Remarks
1.	SI Fazal Ghafoor	SBI	BA	08.09.58	10.11.76	RM	22.02.12	27.04.13	01.11.14	02.11.16	
2.	SI Muhammad Siddique (offg.)	CHD	10 th	08.04.58	05.08.76	WT	01.01.14	13.11.15	01.09.16		
3.	SI Gahfoor-ul-Haq (offg.)	DIR	10 th	02.12.58	31.12.76	WT	01.01.14	13.11.15	01.02.17		FATA
4.	SI Daraz Khan (offg.)	MDN	10 th	01.12.58	06.01.77	WT	01.01.14	13.11.15	08.12.16		
5.	SI Sultan Mohammad (offg.)	Pesh	10 th	08.05.58	07.10.76	WT	01.02.14	13.11.15	01.04.17		
6.	SI Shad Ali (offg.)	MDN	10 th	20.05.58	24.09.78	RM	01.01.14		14.03.17		
7.	SI Iqbal Shah (offg.)	Pesh	10 th	05.07.58	14.01.77	TP	01.11.14		14.03.17		
8.	SI Muhammad Zaman (offg.)	DIR	10 th	01.11.58	22.01.77	WT	02.02.15		14.03.17		
9.	SI Jan Bahadur (offg.)	Swat	10 th	01.01.59	24.01.77	WT	02.02.15		14.03.17		

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ATTESTED

SENIORITY LIST OF RM CADRE OF POLICE TELECOMM: KHYBER PAKHTUNKHWA, PESHAWAR.

SIs	ASIs	HCS	Constables
02	01	18	30

S. No	Name/Rank	H/Dist	Edu	D.O.B	D.O.A	T/ Convert	D.O.C	D.O.P.			D.O.HC offg:	D.O.C HC	List D	D.O.P. ASI	D.O.C. ASI	Date of Prom: List E	D.O.P. ASI	Remarks	
								A	B	C									
1.	SI Fazal Ghafoor	Swabi	BA	08.09.58	10.11.76											27.04.13	01.11.14		
2.	SI Shad Ali	MDN	10 th	20.05.58	24.09.78	30.06.79	24.09.81	01.10.83	02.10.83	04.10.83	01.05.82	01.09.90	01.06.94	22.02.12	22.02.14				FATA
3.	HC/620 Fazle Qadeem	SBI	10 th	05.03.60	16.10.79	RM	16.10.82	02.11.85	03.11.85	04.11.85	01.08.85	01.08.00	30.03.12						FATA
4.	HC/Muhammad Ijaz	CHD	10 th	15.05.65	01.06.83	RM	01.03.99	18.06.89	18.06.89	19.06.89	07.09.94	03.03.12	30.03.12						FATA
5.	HC/781 Ziaul Gul	Pesh	10 th	18.07.60	01.12.83	12.01.84	01.09.00	18.06.89	18.06.89	19.06.89	01.04.96	20.02.14	30.03.12						
6.	HC/Rohul Amin	NSR	10 th	13.03.63	01.08.83	RM	01.09.01	30.12.89	26.06.95	04.04.96	01.10.02	20.02.14	30.03.12						
7.	HC/Muhammad Karim	CHD	10 th	03.03.65	02.05.84	15.07.84	01.10.02	30.12.89	26.06.95	18.04.96	01.10.02	20.02.14	30.03.12						FATA
8.	HC/766 Haroon Rashid	Pesh	10 th	10.04.59	01.10.80	04.07.85	01.10.83	30.12.89	05.07.95	18.04.96	01.02.03	20.02.14	30.03.12						
9.	HC/Riaz Muhammad	SBI	10 th	29.03.68	03.04.85	07.09.85	01.09.00	09.12.91	05.07.95	18.04.96	01.02.03	20.02.14	30.03.12						M/Way
10.	HC/459 Khani Zaman ✓	MDN	BA	18.03.59	24.03.77	05.08.89	26.10.80	09.12.91	05.07.95	18.04.96	12.12.05	20.02.14							
11.	HC/168 Manzoor Hussain	Pesh	10 th	15.10.60	01.02.82	RM	27.03.07	07.05.96	19.08.06	19.08.06	23.04.08	20.02.14							
12.	HC/753 Arnan Ullah	DIK	10 th	01.04.70	11.07.89	RM	01.09.00	07.05.96	19.08.06	19.08.06	31.10.08	20.02.14							
13.	HC/421 Akbar Ali Shah	MDN	FA	17.04.71	26.01.92	09.12.93	27.03.07	07.05.96	19.08.06	19.08.06	31.10.08								
14.	HC/690 Muhammad Fayyaz	BXU	10 th	11.09.73	05.08.92	09.12.93	20.05.08	07.05.96	19.08.06	19.08.06	10.04.12								
15.	HC/735 Amir Zaman	U/Di	10 th	15.11.67	25.06.86	09.02.95	-	07.05.96	19.08.06	19.08.06	10.04.12								
16.	HC/927 Anjum Farooq	ABTD	10 th	02.06.69	25.06.87	09.02.95	-	07.05.96	19.08.06	19.08.06	01.01.14								
17.	HC/188 Muhammad Sardar	CHL	10 th	12.02.69	30.09.87	09.02.95	-	07.05.96	19.08.06	19.08.06	30.07.15								
18.	HC/ Essar Mahmood	MKD	10 th	26.03.74	19.02.94	09.02.95	-	07.05.96	19.08.06	19.08.06	30.07.15								FATA
19.	HC/123 Hayat Ullah	BXU	10 th	10.02.71	18.09.89	25.02.96	-	07.05.96	19.08.06	19.08.06	30.07.15								
20.	HC/985 Nazir Muhammad	L/Di	FA	01.03.74	26.08.92	25.02.96	-	07.05.96	19.08.06	19.08.06	01.04.17								
21.	HC/Rizwan Ullah	CHD	10 th	20.11.73	10.08.93	25.02.96	-	13.11.15	16.11.15	17.11.15	08.12.16								
22.	HC/101 Masud Iqbal	MDN	10 th	24.11.69	08.09.93	25.02.96	-	13.11.15	16.11.15	17.11.15	01.02.17								M/Way
23.	HC/114 Sharif Ullah	LKI	10 th	28.02.75	12.01.94	25.02.96	-	13.11.15	16.11.15	17.11.15	01.02.17								

Deputy Inspector General of Police
Tele Communication Khyber Pakhtunkhwa
Peshawar

ATTESTED

S.No.	RANK/NAMES	DISTT	EDU	D.O.B	D.O.A	Trad	D.O.Abf/Conv.	DATE OF PROMOTION LIST			D.O.P OFFC HC	D.O.P LIST "D"	D.O.P AS ASI	D.O.P List "E"	D.O.P AS SI	D.O.P AS List "F"	D.O.P AS Intf	D.O.P AS DSP	Remarks	
								A	B	C										
1	Insp. Sher Wazir	CHT	BA	02.03.63	20.04.87	WT	01.05.97													
2	Insp. Muhammad Saeed	MNSR	10 th	07.12.70	15.01.89	WT	07.11.98													
3	Sr Muhammad Siddique	CHD	10th	08.04.58	05.03.76	WT														
4	SI Tifa Mohammad	CHD	10th	01.03.58	08.04.76	WT														
5	SI Sultan Mohammad	PESH	10th	08.05.58	07.10.76	WT														
6	SI Fazal Ghaffoor	SRI	BA	08.09.58	10.11.76	RM														
7	SI Ghaffoor-ul-Haq	DIR	10th	02.12.58	31.12.76	WT														
8	SI Daraz Khan	MDN	10th	01.12.58	06.01.77	WT														
9	ASI Iqbal Shah	PESH	10th	05.07.58	14.01.77	TP	15.04.79													
10	HC/705 Gul Zaid	SRI	10 th	01.01.59	22.01.77	WT														
11	ASI Muhammad Zaman	DIR	10 th	01.11.58	15.01.77	WT														
12	ASI Sher Zaid	CHD	10 th	13.01.59	22.01.77	WT														
13	ASI Jan Bahadur	Swat	10 th	01.01.59	24.01.77	WT														
14	ASI Abdul Malik	MDN	10 th	25.05.58	25.01.77	WT														
15	ASI Niaz Badshah	MDN	10 th	15.10.58	28.01.77	WT														
16	ASI Sher Rehman	BMR	10 th	07.02.59	06.02.77	WT														
17	HC/69 Khatir Zaman	MDN	BA	18.03.59	24.03.77	RM														
18	ASI Gul Rehman	TANK	10 th	01.04.59	09.04.77	WT														
19	ASI Shahid Ahmad	CHD	10 th	15.02.59	13.04.77	WT														
20	ASI Qamar Zaman	SRI	M.A	06.05.58	23.04.77	WT														
21	ASI Bashir Gul	MDN	10 th	15.05.58	01.06.77	WT														
22	ASI Muhammad Javed	CHD	10 th	12.06.58	01.06.77	WT														
23	ASI Muhammad Usmani	DIR	10 th	03.09.58	01.06.77	WT														
24	ASI Naveed Awan	PESH	10 th	16.03.59	01.06.77	WT														
25	ASI Zahir Ullah	CHD	10 th	18.08.58	03.06.77	WT														
26	ASI Faris ur Rehman	PESH	10 th	04.05.59	15.06.77	WT														
27	ASI Abdul Wahid	MDN	10 th	01.05.59	18.06.77	WT														
28	ASI Ghina Yousaf	EKI	10 th	06.10.58	27.06.77	WT														
29	ASI Zahir Khan	PESH	10 th	07.06.59	09.07.77	WT														
30	ASI Bilal Khan	CHD	10 th	26.03.59	23.07.77	WT														
31	ASI Abid Tawab	SRI	10 th	16.04.59	15.08.77	WT														
32	HC/34 Fayaz Ullah	SBI	10 th	26.08.58	30.08.77	WT														
33	ASI Faraz Iqbal	MDN	10 th	14.02.59	01.09.77	WT														
34	ASI Rehman Siddiq	MDN	FA	21.06.59	05.11.77	WT														
35	ASI Bilal Khan	MDN	10 th	02.11.59	06.11.77	WT														
36	ASI Saad Bahadar	CHD	10 th	20.08.59	26.11.77	WT														
37	HC/304 Saeed Ahmad	MDN	10th	01.05.59	12.12.77	WT														
38	ASI Shamsir Khan	CHD	10 th	04.05.59	10.01.78	WT														
39	ASI Tarab Khur 95	Pesh	10 th	28.02.59	15.01.78	Comp	18.04.83													
40	HC/389 Abdul Hakeem	CHD	10 th	02.06.59	16.01.78	WT														
41	HC/523 Usman Ali	NSR	10 th	12.05.59	18.01.78	WT														
42	HC/314 Faris ur Rehman	MDN	10 th	12.05.58	23.01.78	WT														
43	HC/949 Sher Afzal	MDN	10 th	21.01.59	04.02.78	WT														
44	HC/848 Khayat Ullah	MDN	10 th	21.10.59	04.02.78	WT														
45	HC/423 Afim Khan	CHD	10 th	01.03.58	04.02.78	WT														
46	HC/391 Nazeer Khan	DIK	10 th	29.02.59	02.02.78	WT														
47	HC/438 Nahi Gul	CHD	10 th	11.10.59	08.03.78	WT														

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CHD

LIST OF SUB INSPECTORS OF TELECOMMUNICATIONS

S/No.	RANK / NAMES	DISTT.	EDU	D.O.B	D.O.A	D.O.P as ASI	D.O.P as SI	D.O.P as List "F"
1.	SI Farid Ullah	PESH	10 th	03.02.58	01.10.76	01.12.00	19.07.12	25.10.16
2.	SI Shamsheer Khan	BNR	10 th	20.01.58	21.01.76	01.07.98	01.06.13	25.10.16
3.	SI Zahir Badshah	MDN	10 th	24.11.57	26.01.76	18.12.03	01.08.14	25.10.16
4.	SI Sher Wali	SBF	09 th	20.01.58	06.02.76	08.05.07	01.08.14	25.10.16
6.	SI Muhammad Siddique	CHD	10 th	08.04.58	05.03.76	01.01.14	01.09.16	
7.	SI Abdul Hakim	DIK	10 th	03.11.57	31.12.76	01.01.14	08.12.16	
8.	SI Daraz Khan	MDN	10 th	01.12.58	06.01.77	01.01.14	08.12.16	
9.	SI Gahfoor-ul-Haq	DIR	10 th	02.12.58	31.12.76	01.01.14	01.02.17	
10.	SI Tila Mohammad	CHD	10 th	01.03.58	08.04.76	01.01.14	01.04.17	
11.	SI Sultan Mohammad	PESH	10 th	08.03.58	07.10.76	01.02.14	01.04.17	

20

23

Tele: No.091-9210381
Fax: No.091-9210638

From : The Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

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

No. 11692 /Tele/OASI, dated Peshawar the 8 / 9 /2016.

Subject: PROMOTION TO THE RANK OF OFFG: INSPECTOR IN R/O FAZAL
GHANI OF POLICE TELECOMMUNICATION.

Memorandum:

Kindly refer to this office Memo: No. 9728/Tele/OASI, dated 20.07.2016 and Memo: No.11028/Tele/OASI, dated 23.08.2016 (copy enclosed for ready reference).

It is clarified that presently the following administrative posts, are exist in Telecomm: unit as per budget Book.

DSP = (02) Inspector = (04)

The above mentioned posts internally distributed amongst the MT/Tele Section to look after the administrative requirement of both sections.

Posts.	MT Section	Tele Section
DSP	01	01
Inspector	01	03

At the moment both the post of DSP (Tele/MT) filled from MT Section due to non availability of eligible inspector from Tele side to promote him. Presently DSP Qamar Zaman and DSP Ahmad Jan performing duties as DSPs MT and there is no DSP/Tele.

On other hand presently the post of Inspector MT is lying vacant and no sub Inspector of MT Section is eligible to promote him against the vacant post of Inspector MT. Therefore, the case of SI fazal Ghani being retiring on superannuation pension on 09.10.2016 was recommended for promotion to the rank of Inspector, just to avail the pension benefits for a period of one month.

It is therefore, requested that his case may kindly be considered in an early dates as he has remaining only 30 days in retirement please.

0/0/v
c/v
(DR. WAQAR UDDIN SYED)
Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

R- 7/8/16

Encl-1 - (02) fono
ATTESTED

(24)

**FOR PUBLICATION IN THE KHYBER
PAKHTUNKHWA POLICE GAZETTE PART-II,
ORDERS BY THE INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA PESHAWAR.**

NOTIFICATION

No. 3498/E-III, **ADMISSION TO LIST "F" & PROMOTION AS OFFIC: INSPECTOR** Dated: 25/09/2016

As per recommendation of the DPC dated 23.09.2016 duly approved by the worthy Inspector General of Police Khyber Pakhtunkhwa, names of the following confirmed Sub-Inspectors are hereby included in List "F" & promotion as Offg: Inspector with immediate effect:-

S.NO	NAME & NO.	REGION	RECOMMENDATION
1.	SI Fazal Akbar No. MR/112	Mardan	Recommended his name for promotion as Offg: Inspector. However, he will have to complete his one (01) year mandatory tenure in any of the institution mentioned in Standing Order No. 21/2014. Moreover, according to Standing Order No. 3/2015, he will have to earn five (05) points as well.
2.	SI Anwar Saeed No. 334/M	Malakand	Recommended his name for promotion as Offg: Inspector. The Committee further recommended for exemption from Standing Order No. 3/2015, because he is retiring on 13.11.2016, after attaining the age of superannuation.
3.	SI Wali Muhammad No. 337/M	Malakand	Recommended his name for promotion as Offg: Inspector. The Committee further recommended for exemption from Standing Order No. 3/2015, because he is retiring on 31.12.2016, after attaining the age of superannuation.
4.	SI Allah Wasaya No. D/28	D.I.Khan	Recommended his name for promotion as Offg: Inspector. The Committee further recommended for exemption from Standing Order No. 3/2015, because he is retiring on 10.01.2017, after attaining the age of superannuation.
5.	SI Amal Khan No. K/41	Kohat	Recommended his name for promotion as Offg: Inspector. The Committee further recommended for exemption from Standing Order No. 3/2015, because he is retiring on 11.10.2016, after attaining the age of superannuation.
6.	SI Abdul Latif No. K/86	Kohat	Recommended his name for promotion as Offg: Inspector. The Committee further recommended for exemption from Standing Order No. 3/2015, because he is retiring on 05.01.2017, after attaining the age of superannuation.
7.	SI Rast Ali No. K/74	Kohat	Recommended his name for promotion as Offg: Inspector. The Committee further recommended for exemption from Standing Order No. 3/2015, because he is retiring on 30.09.2016, after attaining the age of superannuation.
8.	SI Rahmat Ali No. 362/M	Malakand	Recommended for inclusion of his name in List "F".
9.	SI Minhaj Sikandar Yar Khan No. D/9	D.I.Khan	Recommended for inclusion of his name in List "F".
10.	SI Ebad Wazir No. D/11	D.I.Khan	Recommended for inclusion of his name in List "F".
11.	SI Diyar Khan No. MR/133	Mardan	Recommended for inclusion of his name in List "F".
12.	SI Zahid Ali No. MR/134	Mardan	Recommended for inclusion of his name in List "F".
13.	SI Sakhawat Shah No. MR/135	Mardan	Recommended for inclusion of his name in List "F".
14.	SI Bakht Shed No. MR/137	Mardan	Recommended for inclusion of his name in List "F".

ATTESTEE

15.	SI Amir ud Din No. MR/138	Mardan	Recommended for inclusion of his name in List "F"
16.	SI Nigah Hussain No. MR/139	Mardan	Recommended for inclusion of his name in List "F"
17.	SI Habib Khan No. MR/141	Mardan	Recommended for inclusion of his name in List "F"
18.	SI Abdul Baseer No. MR/142	Mardan	Recommended for inclusion of his name in List "F"
19.	SI Muhammad Fazil No. MR/143	Mardan	Recommended for inclusion of his name in List "F"
TELECOMMUNICATIONS CASES			
20.	SI Muhammad Anwar		Recommended for inclusion of his name in List "F"
21.	SI Shamsheer Khan		Recommended for inclusion of his name in List "F"
22.	SI Siraj Ahmad		Recommended for inclusion of his name in List "F"
23.	SI Fazal Ghani		Recommended his name for inclusion in List "F" and promotion to Offg: Inspector. He is retiring from service on 09.10.2016, after attaining the age of superannuation.

Sd/-
MIAN MUHAMMAD ASIF
Addl: IGP/HQrs
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. 3499-3512/E-III

Copy of above is forwarded for information to the:-

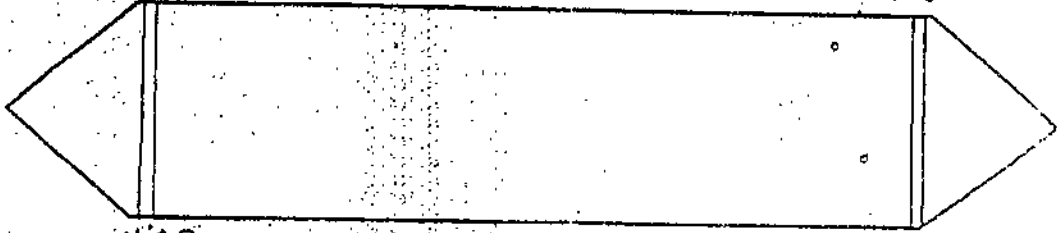
- i. Addl: Inspector General of Police, HQrs: Khyber Pakhtunkhwa Peshawar.
- ii. Deputy Inspector General of Police, HQrs: Khyber Pakhtunkhwa Peshawar.
- ✓ iii. Deputy Inspector General of Police, Telecommunications, Khyber Pakhtunkhwa Peshawar.
- iv. Regional Police Officers, Mardan, Malakand, Kohat & D.I. Khan Regions.
- v. PSO to worthy Inspector General of Police, Khyber Pakhtunkhwa.
- vi. PRO to worthy Inspector General of Police, Khyber Pakhtunkhwa.
- vii. Registrar, CPO, Peshawar.
- viii. Office Supdt: Secret CPO, Peshawar.
- ix. Office Supdt: E-II CPO Peshawar.
- x. Office Supdt: CPB Branch CPO, Peshawar.

ATTESTED

(NAJEEB-UR-REHMAN BUGVD)
207/Pers. Attachment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

20

بعدالت



2 منجانب
بنام

موزخه
مقدمہ
دعویٰ
جرم

باعث تحریر آئینہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

کیلئے

آن مقام

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالت ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساخت
پرداخت منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانش التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حدیے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند ہے۔

20

المقام

واہ

بمقام

کے لئے منظور ہے۔

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. 1456 of 20 18.

M. Farid Khan

Appellant/Petitioner

Versus

F. S. Khan

RESPONDENT(S)

Notice to Appellant/Petitioner

M. Farid Khan
Sub-inspector, Postal & Police School
of Telecommunication Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-2-2019 at 9.00 A.M. at Peshawar

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

22

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,

PESHAWAR.

No.

APPEAL No.

1456

of 2018.

Appellant/Petitioner

Mrs. Farida Khan

Versus

F. S. Khan / etc. / etc. / etc. / etc.

RESPONDENT(S)

15 Counsel

Notice to Appellant/Petitioner

Mrs. Abida Khan

Take notice that your appeal has been fixed for Preliminary hearing,

on replication, affidavit/counter affidavit/record/arguments/order before this Tribunal at *19-8-2018* at *8.00 A.M. / etc. / etc.*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

[Signature]

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

7/5/19

Appeal No. *11456* of 20 *18*.

Muhammad Fozal Khan Appellant/Petitioner
 Versus

I. S. J. P. Khan, J. J. Khan, J. J. Khan Respondent
 Respondent No. *1*

Notice to:

*Inspector General of Police,
 Peshawar.*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *25-7-2019* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this *20/7/19*

Day of *July*, 20 *19*.

[Signature]
 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 11156 of 2018.
Mr. Farid Khan Appellant/Petitioner
I.S. of Police, K.P. Peshawar Versus
K.P. Peshawar Respondent

Respondent No. 2

Notice to:-

Dep. Inspector General of Police
Peshawar, K.P. Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 25/11/18 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated.....

Given under my hand and the seal of this Court, at Peshawar this 27/11 Day of June, 2019.

10/7/2019

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No..... of 20

1456 18.

.....Appellant/Petitioner
Mr. Farid Khan

Versus

.....Respondent
I.S.O. Khan, Khyber Pakhtunkhwa
Respondent No.....

Notice to: —

Chief, Capital Police Officer

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of..... 20

June 19.

28/6

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

75/17/19

Appeal No..... *11156* of 20*19*

M. F. Khan Appellant/Petitioner
Versus

Inspector, Police, Peshawar Respondent

Respondent No..... *4*

Notice to: - *Additional Inspector in Charge of Police, Headquarters Peshawar*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... *17/11/19* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached
Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... *17/11/19*

Day of..... *Nov* 20 *19*

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No. 1456 of 2018.

Fazal Ghafoor, Appellant/Petitioner

Versus

I G of Police KPK Pesh Respondent

Respondent No. I

Notice to: —

Inspector General of Police KPK Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 7-11-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 16th

Day of Oct 2019.

[Signature]
2/11/x

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 1456 of 20 18

..... Fazal Ghafoor Appellant/Petitioner
Versus

..... I-G of Police KPK Pesh Respondent

Respondent No. 2

Notice to: - Deputy Inspector General of Police Telecom,
KPK Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... at 8.00 A.M. If you wish to urge anything against the appellan/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of ~~appeal~~ has already been sent to you vide this office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 26/11

Day of..... Oct 20 19

25/10/19

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No. 1456 of 2018

Fazal Ghafoor Appellant/Petitioner

Versus

I.G. of Police KPK Pesh Respondent

Respondent No. 3

Notice to: —

Chief Capital Police Officer,
Peshawar.


WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 7-11-2019 at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 16th

Day of Oct 2019


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1456/2018

Fazal Ghafoor..... (Appellant)

Versus

Provincial Police officers and others..... (Respondents)

INDEX

S.No.	Description of documents	Annex	Pages
1.	Memo of comments	-	1 to 2
2.	Retirement order	A	3
3.	Recommendation for list F	B	4
4.	Affidavit		5

Respondent Through



Department
Representative

①

BEFORE THE HONORABLE SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1456/ 2018.

Fazal Ghafoor(Appellant)

VERSUS

Provincial Police Officer and others.....(Respondents)

SUBJECT: **COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER**

RESPECTIVELY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) The appeal is not based on facts.
- b) The appeal is not maintainable in the present form.
- c) The appeal is bad for miss-joinder and non-joinder of necessary parties.
- d) The appellant is estopped to file the appeal by his own conduct.
- e) The appellant has not come to this Honorable Tribunal with clean hands.
- f) The appellant has got no cause of action to file present Service Appeal.

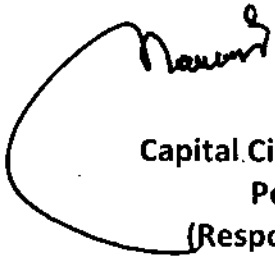
FACTS:-

1. Pertains to record.
2. Subject to proof.
3. Pertains to record.
4. Para No. 4 in respect of appellant service record is subject to proof.
5. Pertains to record.
6. First portion of this Para is subject to proof however, the appellant has been retired from service on 08.09.2018, **(Annexed-A)** after attaining the age of superannuation. Furthermore, there is no provision in rules for promotion after retirement therefore, the request made by the appellant is not maintainable under the relevant rules.
7. Correct to the extent that DIG/ Telecommunication KPK vide his Office Letter No. 4103/Tele/OS dated 05.04.2018, **(Annexed-B)** recommended the name of appellant in promotion list "F" as the appellant was going to retire on 08.09.2018, on attaining the age of superannuation however, the appellant has been retired from service on 08.09.2018 and there is no provision in rules for promotion after retirement hence, his case was not considered as per law/ rules.
8. That the appellant was retired from service on 08.09.2018 hence, his application for the promotion to the rank of Inspector was not considered and rejected in accordance with law/ rules.

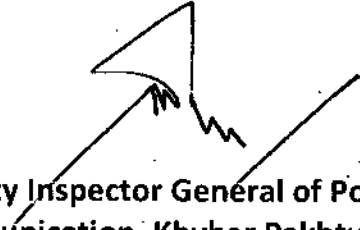
9. Incorrect. That the appellant has been treated in accordance with law/ rules.

PRAYER:-

In view of the above, it is humbly prayed that on acceptance of Para-wise comments, the instant Service Appeal may kindly be dismissed being meritless.



**Capital City Police Officer,
Peshawar.
(Respondent No. 3)**



**Deputy Inspector General of Police,
Telecommunication, Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 02)**



**Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 4)**



**Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 01)**

3

Annex "A"

ORDER/SANCTION

SI Fazal Ghafoor of this unit posted at Police School of Telecommunication, Peshawar is attaining the age of superannuation i.e. 60 years on 08.09.2018. He is hereby retired from service with effect from 08.09.2018 as per his record.

365 days encashment is hereby sanctioned to SI Fazal Ghafoor as per the terms of Finance Department Letter No. SO (FR) FD 5-92/2005/ Vol-V, dated 13.12.2012. Rs. 4,77,000/- (Four Lac, Seventy Seven thousand only)

Certified that he could but did not proceed on L.P.R and exercised option in favour of encashment.

Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

No. 10462-74

Tele/EC, dated Peshawar the 14/09/2018.

Copies forwarded for information and necessary action to the: -

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Accountant Telecomm: Peshawar.
3. PA to DIG Telecomm: Khyber Pakhtunkhwa Peshawar.
4. Pension Clerk Telecomm: Peshawar along with service roll and service book.
5. EC/Tele Peshawar.
6. SP/Telecomm: Peshawar.
7. DSP/Telecomm: Peshawar.
8. Office Supdt: Telecomm: Peshawar.
9. GASI/Telecomm: Peshawar.
10. Principal School telecomm.
11. OASI/Telecomm: Peshawar.
12. ACR Clerk/Telecomm: Peshawar.
13. OB No. 327/2018.

(13)

(4)

Annex 'B'

Tel: No.091-9210381
Fax: No.091-9210638

From : The Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

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


No. *4103* /Tele/OS, dated Peshawar the *5* / *1* / *4* /2018.

Subject: RECOMMENDATION FOR PROMOTION TO LIST "F".

Memorandum:

Please refer to this office Letter No.244/EC, dated 19.01.2018 on the subject cited above. *(Copy enclosed for ready reference)*

An application submitted by Sub Inspector Fazal Ghafoor for placing his name in Promotion List "F" and subsequent promotion to the rank of Inspector is enclosed herewith for kind consideration as the applicant is going to retire on 08.09.2018 on attaining the age of superannuation.


Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar

ATTESTED

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1456/2018

Fazal Ghafoor..... (Appellant)

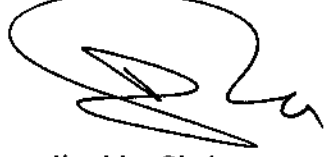
Versus

Provincial Police officers and others..... (Respondents)

AFFIDAVIT

I, Ibrahim Shah office superintendent (BPS-17) of Police Telecommunication KPK Peshawar representative of respondent Department do here by solemnly declare that the contents of accompanying comments on behalf of Respondents Department are correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.

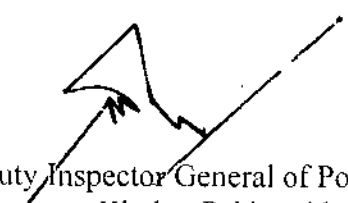
DEPONENT



Ibrahim Shah
OS: Telecomm

AUTHORITY

It is certified that Ibrahim Shah Office Superintendent Tele (BPS-17) of Police Telecommunication is hereby nominated to submit the comments in the Khyber Pakhtunkhwa Service Tribunal on behalf of the respondents department in case service Appeal No.1456/2018 Fazal Ghafoor VS PPO & Others.



Deputy Inspector General of Police
Telecomm: Khyber Pakhtunkhwa
Peshawar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 1456/2018

Fazal Ghafoor..... (Appellant)

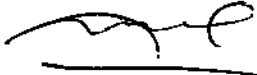
VERSUS

Provincial Police Officer KPK & others..... (Respondents)

INDEX

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Compliance report + Authority letter		1
2.	Affidavit		2
3.	Letter No. 17029/Tele/Legal, dated 01.12.2021.	A	3
4.	Letter No. 12503/Tele/EC, dated 20.10.2017.	B	4
5.	Minutes of the departmental promotion committee dated 19.01.2018.	C	5

DEPONENT



(TARIQ UMAR)
DSP/ Legal,
CPO, Peshawar.
17301-4997553-7
0333-8878882

①

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

Service Appeal No. 1456/2018

Fazal Ghafoor..... (Appellant)



VERSUS

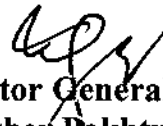
Provincial Police Officer KPK & others..... (Respondents)

SUBJECT: COMPLIANCE IN ORDER SHEET DATED 06.10.2021.

RESPECTFULLY SHEWETH:

In compliance of the order sheet dated 06.10.2021, the following documents are submitted for kind perusal, please.

S. NO	Document	Remarks
1.	Letter No. 17029/Tele/Legal, dated 01.12.2021 (Annexure-A) Letter No. 12503/Tele/EC, dated 20.10.2017 (Annexure-B)	6 posts of Inspectors were vacant at the time of retirement of appellant i.e. year 2018.
2.	Minutes of the departmental promotion committee dated 19.01.2018 (Annexure-C)	As per available record, 3 sub-inspectors were promoted to the rank of Inspector wherein the name of appellant was not mentioned/ discussed in the working papers.


**Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.**

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1456/2018

Fazal Ghafoor..... (Appellant)


VERSUS

Provincial Police Officer KPK & others..... (Respondents)

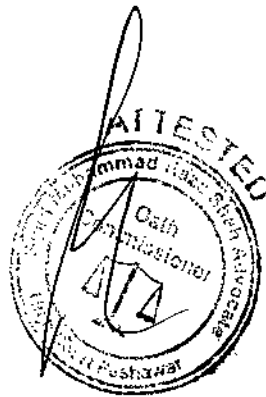
AFFIDAVIT

I, Tariq Umar DSP/ Legal CPO, Peshawar do hereby solemnly affirm on oath that the contents of accompanying compliance report on behalf of Respondent i.e. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar are correct to the best of my knowledge and belief. Nothing has been concealed from this Honorable Tribunal.

Respondent through




(TARIQ UMAR)
DSP/ Legal,
CPO, Peshawar.
17301-4997553-7
0333-8878882



30/3

AUTHORITY LETTER

Mr. Tariq Umar Inspector/ Legal, CPO is authorized to pursue the cases pertaining to Police Department in Honorable Peshawar High Court, Peshawar submission of Para-wise comments/ reply in Court on behalf of undersigned, please.


Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

From : The Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

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

Attention: AIG Legal CPO, Peshawar.

No 17029 Tele/Legal, dated Peshawar the 01 / 12 2021

Subject: SERVICE APPEAL NO.1456/2018 TITLE FAZAL GHAFOOR VS PPO AND OTHERS

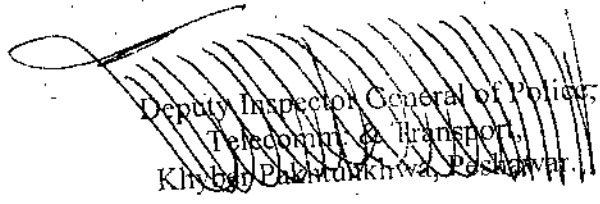
It is submitted that on 12.10.2017, SI Fazal Ghafoor who has been retired from service w.e.f. 18-9-2018 had submitted an application for consideration his name on list "F" which was sent to CPO vide this office Letter No.12393/Tele/EC, dated 18.10.20217 at **Annex-A**

After that, his Character Roll with seniority list, present posting, detail of vacancies of Inspector and No Departmental Enquiry was also submitted to CPO vide this office Letter No.12503/Tele/EC, dated 20.10.20217 at **Annex-B**

That on 07.02.2018, & 21.03.2018 SI Fazal Ghafoor submitted another 02- applications which were sent to CPO vide this office Letter No.9177/WT, dated 16.08.2018 & Letter No.4103/Tele/OS, dated 05.04.2018 at **Annex-C**

Now the retired official have filed Service Appeal in Honorable Service Tribunal for his promotion to the rank of Inspector, in which the honorable Court has directed for placing explicit information as to whether six posts at the time of retirement of the appellant were vacant or not; and if vacant, whether any panel was proposed through proper working paper for promotion of the said post before the retirement of the appellant at **Annex-D**

As promotion to the rank of Inspector is the domain of CPO, it is therefore requested that requisite information as per Order Sheet, dated 06.10.2021 may please be placed before the Khyber Pakhtunkhwa Service Tribunal on 06.01.2022.


Deputy Inspector General of Police,
Telecomm & Transport,
Khyber Pakhtunkhwa, Peshawar.

"B" (5)

Tele: No. 091-9210231
Fax: No. 091-9210628

From: The Deputy Inspector General of Police,
Telecomm: Khyber Pakhtunkhwa, Peshawar.

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

No. 12503 /Tele/EC, dated Peshawar the 20 /10/2017.

Subject: INFORMATION REGARDING SUB-INSPECTORS (BS-14) OF TELECOMMUNICATIONS BROUGHT ON LIST "F".

Memorandum:

In continuation to this office letter No. 12393/Tele/EC, dated 18/10/2017 on the subject cited above.

The Character Roll along with seniority list in r/o Fazli Ghafoor Sub-Inspector and the following information is sent herewith for further necessary action.

S.NO.	PRESENT POSTING	PUNISHMENT
1.	Police School of Telecommunication Peshawar	Nil

Furthermore; it is stated that there are six vacancies of Inspectors are vacant and there is no departmental enquiry is pending against the above named Sub-Inspector.

[Signature]
Deputy Inspector General of Police,
Telecommunication Khyber Pakhtunkhwa,
Peshawar.

AL

(6)

MINUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE MEETING HELD ON 19.01.2018.

On 19.01.2018, the meeting of Departmental Promotion Committee was held in CPO Conference Room-II, under the Chairmanship of Dr. Ishtiaq Ahmed, Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa to discuss the cases of confirmed Sub-Inspectors BPS-14 of Telecommunications already included their names in List "F" vide minutes of Departmental Promotion Committee meeting held on 23.09.2016 for promotion to the rank of Offg: Inspectors BPS-16.

2. The following officers attended the meeting:-


I.	Addl: IGP/Investigation, Khyber Pakhtunkhwa.	Chairman
II.	DIG/Headquarters, Khyber Pakhtunkhwa.	Member
III.	DIG/Enquiry & Inspections, Khyber Pakhtunkhwa.	Member
IV.	AIG/Establishment, Khyber Pakhtunkhwa.	Member
V.	AIG/Legal, Khyber Pakhtunkhwa.	Member


3. The Committee thoroughly examined the record of the following Sub-Inspectors BPS-14 of Telecommunications for promotion to the rank of Offg: Inspectors BPS-16. Recommendations of the committee noted against each officer is submitted as below:-

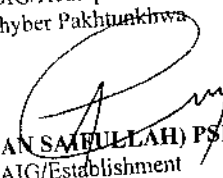
S.NO	NAME	UNIT	RECOMMENDATION
1.	SI Farid Ullah	Tele:	Recommended his name for promotion as Offg: Inspector.
2.	SI Shamsher Khan	Tele:	Recommended his name for promotion as Offg: Inspector.
3.	SI Sher Wali	Tele:	Recommended his name for promotion as Offg: Inspector.

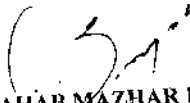
4. Meeting ended with vote of thanks to all.

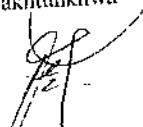
Chairman

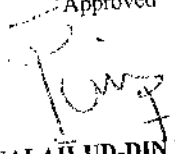

(DR. ISHTIAQ AHMED)
Addl: IGP/Investigation
Khyber Pakhtunkhwa


(SHER AKBAR)
PSP, S.St,
DIG/Headquarters,
Khyber Pakhtunkhwa


(AHSAN SAIBULLAH) PSP
AIG/Establishment
Khyber Pakhtunkhwa


(SHAHAB MAZHAR BHALLI)
DIG/Enquiry & Inspections,
Khyber Pakhtunkhwa


(FALAK NAWAZ)
AIG/Legal
Khyber Pakhtunkhwa

Approved

(SALIM-UD-DIN KHAN)
Inspector General of Police
Khyber Pakhtunkhwa

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

IN Service Appeal No.1456/2018

Fazle Ghafoor

VS

IG Police Khyber Pakhtunkhwa

REJOINER TO THE COMMENTS FILED BY THE OFFICIAL RESPONDENTS.

Respectfully Sheweth:-

Preliminary Objections:-

That the preliminary objections taken by the respondents does not attract to the appeal of the appellant because the appeal is maintainable all the necessary parties are included the appellant has got of action as well as the appellant has approached this Hon'ble Tribunal with clean hand.

On Facts:-

Para 1-5. Needs no reply.

Para 6. Para No.6 of the comments is correct to the extent of the retirement of appellant, furthermore the appellant is praying for promotion prior to his retirement and the law provides as well as the rules provides promotion.

Para 7. Para No.7 of the comments needs no reply because the detail reply has been given in the preceding para.


Para 8. In reply to para No.8 it is submitted that the law and rules provides the promotion at the age of superannuation and the appellant is also praying for promotion prior to his retirement which the law and rules provide.

Para 9. In reply to para No.9 it is submitted that the appellant was not treated in accordance with law and rules.

It is therefore humbly prayed that on acceptance of this rejoinder the appellant appeal may kindly be accepted as prayed for against the respondents.

Appellant,

Through:


Abid Ali Khan,
ASC, Peshawar.

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

IN Service Appeal No.1456/2018

Fazle Ghafoor


VS

IG Police Khyber Pakhtunkhwa

AFFIDAVIT

I, Fazal Ghafoor Appellant, do hereby solemnly affirm and declare that the contents of the rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Identified by:


(Abid Ali Khan)
ASC, Peshawar.


deponent

16202-1039607-1

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

IN Service Appeal No.1456/2018

Fazle Ghafoor

VS

IG Police Khyber Pakhtunkhwa

REJOINER TO THE COMMENTS FILED BY THE OFFICIAL RESPONDENTS.

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Appellant,

Through


Abid Ali Khan,
ASC, Peshawar.

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

IN Service Appeal No.1456/2018

Fazle Ghafoor

VS

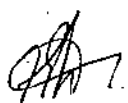
IG Police Khyber Pakhtunkhwa

AFFIDAVIT

I, Fazal Ghafoor Appellant, do hereby solemnly affirm and declare that the contents of the rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Identified by:


(Abid Ali Khan)
ASC, Peshawar.


deponent

16202-1039607-1