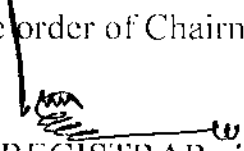


FORM OF ORDER SHEET

Court of _____

Case No.- _____ **293/2023**


S.No	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/02/2023	<p>The appeal of Mr. Nisar Muhammad resubmitted today by Mr. Muhammad Abdullah Baloch Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Nisar Muhammad Khan DSP presently Acting SP Motor Transport Peshawar received today i.e. on 30.01.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal be attested.
- 2- Pages 8, 9 to 17, 19, 48, 49 and 50 of the appeal are illegible which may be replaced by legible/better one.

No 389 /ST,

Di. 30/01 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

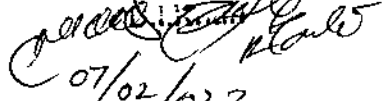
M. Abdullah Baloch Adv.
High Court at D.I. Khan.

Respected Sir,

After compliance of directions
and after rectifying the deficiencies,
The instant appeal may kindly be
re-submitted.

Muhammad Abdullah
Baloch BHC

Muhammad Abdullah Baloch
Advocate High Court


07/02/2023

BEFORE THE NWFLP SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. 293 /2023

Nisar Muhammad Khan
(Appellant)

Versus

Govt; of KPK etc
(Respondents)


INDEX

S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit	--	1 - 7
2.	Copy of memo No. 5427/EXAM dated 22/11/1994	A	8 - 15
3.	Copy of Order Endst. No. 3161-62/ES dated 30/12/1998	B	16
4.	Copy of Order 1891-94/ES dated 20/07/2001	C	17
5.	Copy of Office order NO. 911-13 dated 17/04/2004.	D	18
6.	Copy of Order No. 1718-24 Bannu dated 25/08/2006	E	19
7.	Copy of the impugned seniority list	F	20 - 27
8.	Copy of previous departmental appeal against seniority list	G	28 - 30
9.	Copy impugned promotion Notification Office No. SO(E-I)E&AD/2-4/2022 Dated 05/09/2022	H	31, 32
10.	Copy of departmental appeal	I	33 - 38
11.	Copy of Notification dated 08/12/2022	J	39
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Dated: 30 /01/2023

Your humble appellant


Nisar Muhammad Khan
Through counsel.


Muhammad Abdullah Baloch
Advocate High Court

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 293 /2023

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

Appellant

VERSUES

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

Respondents

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED NOTIFICTAION OFFICE NO. SO(E-I)E&AD/2-
4/2022 DATED 5/9/2022 WHEREBY SOME OF THE JUNIORS HAS BEEN
PROMOTED TO THE RANK OF SUPRETENDENT OF POLICE (BS-18) ON
REGULAR BASIS AND APPELANT HAS BEEN DEPRIVED OF HIS DUE
RIGHT OF PROMOTION AND DISCRIMINTAION HAS BEEN METED OUT
AND SERVICE APPEAL AGAINST INDISICION OF THE DEPARTMENTAL
APPEAL OF THE APPELANT.

Ch. Akhtar

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

Respected Sir;

1. That the appellant is serving as Deputy Superintendent of Police (BS-17) and currently posted as Acting SP Motor-Transport Peshawar.
2. That the appellant was appointed as Assistant Sub Inspector (BS-9) in KPK Police Department on the recommendation of KPK Public Service Commission on 09/01/1995 in Bannu region. In the merit list assigned by the Public Service Commission, the appellant stood at Serial No.32 in the merit Order vide secretary Public Service Commission, NWFP, Peshawar memo No. 5427/EXAM. dated 27/11/1994. Copy is annexed as "Annexure-A".
3. That after completion of successful probation period, the appellant was confirmed as ASI effective from the date of appointment i.e 09/01/1995 vide Regional Police Officer Bannu Region Order Endst: No. 3161-62/ES dated 30/12/1998. Copy is annexed as "Annexure-B".
4. That in spite of having unblemished service and in the absence of anything adverse, the appellant was belatedly brought on list "E" on 13/07/2001 vide Regional police office bannu Region Order No. 1891-94/ES dated 20/07/2001 instead of from the date of confirmation i.e 09/01/1995. Copy of Order 1891-94/ES dated 20/07/2001 is annexed as "Annexure-C". After that the appellant was consider suitable for promotion as Offg; sub-inspector vide office order NO. 911-13 dated 17/04/2004. Copy is annexed as "Annexure-D". After that the appellant was belatedly promoted in substantive rank of sub-inspector vide Office Order No. 1718-24 Bannu dated 25/08/2006. Copy is annexed as "Annexure-E".
5. That due to belated inclusion of the name of the appellant in seniority list "E", the appellant was unjustifiably promoted as Offg; sub-inspector late in time and consequently lately confirmed as sub-inspector. And due to this reason became junior to his batch mates.
6. That the appellant was not given inter-se seniority among his batch mates as per merit assigned by KP public service Commission. And due to late confirmation as SI seniority of appellant was disturbed which might be a clerical mistake, which travelled along the seniority of the appellant and culminated in to final seniority list issued vide seniority list No. 1594/SE-I

Chaudhary

(3)

- dated 05/08/2022. That name of the appellant was wrongly shown at serial No. 83, below the name of Mr Mujeeb ur Rahman and above the name of Mr. Rahmat Ullah, while the officers junior to the appellant are placed at serial No. 37 to 44 (the officials recruited in 1998 batch). Copy of the seniority list is annexed as "Annexure-F".
7. That after the issuance of seniority list dated 05/08/2022, being continuance cause of action, the appellant preferred a departmental appeal on 12/08/2022. Copy of a departmental appeal is annexed as "Annexure-G". (let it not be mentioned here that after the lapse of statutory period, the service has also been filed before the honourable KP service tribunal).
 8. That despite of pendency of departmental appeal of the appellant, the impugned promotion Notification Office No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 has been issued and promoted some of the junior from the appellant. Copy of the impugned notification is annexed as "Annexure-H".
 9. That appellant submitted a departmental appeal against the impugned Notification through proper channel on 30/09/2022. Copy of departmental appeal is annexed as "Annexure-I".
 10. That uptill now no response has been shown from the respondents and after the laps of statutory limitation of departmental appeal, cause of action has been accrued to the appellant for instant appeal. Hence, the instant service appeal, inter alia on the following grounds.

GROUNDS

1. That the Appellant has not been provided equal treatment when there is no express inhibition against him under the law and has also not been given equal protection of law, which is discriminatory instance of arbitrariness and is against the principles enshrined in Articles-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
2. That the Appellant has been subjected to injustice and the case of Appellant has not been dealt with under the principle of the fair play.
3. That on 08/12/2022 a Notification No. 317/CPB was issued wherein anomaly has been clarified by expressing the following words "All PASIs on successful completion of 3 years probation period shall be brought on promotion list "E" from the date of appointment. If the said notification is implemented date of appointment of the appellant is 09/01/1995 but he was brought into list "E" on 13/07/2001. Thus, the date of entry into list "E" for the appellant ought to be 09/01/1995. Hence, if this error is rectified, the appellant would gain his seniority back and is entitled for promotion

Mr. Advocate

(4)

with his batch mates. Copy of Notification dated 08/12/2022 is annexed as "Annexure J"

4. That the impugned notification is against the settled laws and rules of Seniority in service and no legal footings. Hence ineffective upon the rights of appellant.
5. That it has been clearly the mandate of law and the verdicts of the Apex Courts that discretion should be excised fairly and justly and should not be exercised arbitrarily. The belated entry of the appellant in list "E" is discriminatory and infringed the rights of the appellant. Hence, the impugned seniority list is in violation of rules and statutory provisions as well as the dicta of superior courts pronounced in a number of judgments, hence the same needs to be corrected.
6. That appellant was inducted into service upon the recommendation of KP Public Service Commission on 09/01/1995 whereas respondents No. 6 to 12 were inducted via 1998 batch. Hence, are junior from the appellant. It has been settled principle that servants selected through earlier selection process are always senior to the servants selected in later selection process.
7. That after the confirmation as ASI vide Office Order No. 3161-62 dated 30/12/1998, effective from date of appointment i.e 09/01/1995, the appellant was brought into list "E" with effect from 13/07/2001 and not from the date of confirmation as ASI i.e 09/01/1995 and due to this the appellant became junior even among his batch-mates. Thus, the discretion of the competent authority to brought name of police official in to list "E" was not exercised according to justice and was discriminatory
8. That vide Merit Order of secretary Public Service Commission, NWFP, Peshawar memo No. 5427/EXAM dated 22/11/1994, one Mr Abdul Hai Khan was stood at top i.e serial No.1 in DIKhan Region. His seniority was disturbed due to late confirmation in the rank of Sub Inspector and due to not maintaining the merit assigned by Public Service Commission with his batch-mates. The official preferred a service appeal No. 991/2018, titled "Abdul Hai Khan DSP Vs Govt; of KPK". The Worthy Service Tribunal established that Civil Servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter-se seniority as in the lower post. Let it not be mentioned here that Mr. Abdul Hai and the appellant belongs to the same batch. The service appeal No. 991/2018 was accepted vide judgment dated 17/12/2020. Copy of appeal and judgment is annexed as "Annexure K". In consequence the promotion list "E" in DIKhan region has also been revised but seniority list

MC
Advocate

5

"E" in bannu region has not been rectified so far. Copies of Order No. 3448-55 and 3456-SE and order No. 3457-64 and Order No. 3488-96 and Order No. 3477-86 all dated 30/05/2022 and Order No. 4570-78/ES and Order No. 4580-88/ES both dated 30/06/2022 are annexed as

"Annexure L"

9. That by dint of judgment of the Worthy Service Tribunal dated 17/12/2020 in Service appeal No. 991/2018, DIKhan region has revised and corrected Office Notification No. 622/ES dated 25/04/1998, the date of bringing the name of Mr. Abdul Hai, along with his batch-mates, on the promotion list "E" has been revised in the light of PR. 13.11 and 19.25(5). Thus to eliminate the discrimination office notification No1891-04/ES (entry to list "E") in respect of the appellant in bannu region deserves revision and correction.
10. That in view of the Rule 17 sub rule 1 (a) of the KP Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 'The Seniority inter se of civil servants shall be determined in case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission.' The respondent NO.13 is junior to the appellant in banuu region keeping in view the inter se seniority as per merit assigned by KP Public Service Commission.
11. That also according to the Rule 2 (2) of the Civil Servants (Seniority) Rules, 1993 "If two or more persons are recommended in open advertisement by the Selection Authority their inter-se seniority shall be determined in order of merit assigned by the selection authority".
12. That as per Rule 17 (2) of the KPK Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 "Seniority in the various cadres of the civil servants appointed by initial recruitment vis-a vis those appointed otherwise shall be determined with reference to their dates of their regular appointment to a post in that cadre".
13. That according to Section 8 (4) of the KPK Civil Servant Act, 1973, "Seniority in a post, service or cadre to which a civil servant is promoted shall take effect from date of regular (initial) appointment".
14. That the appellant is entitled for equal treatment as per Article 25 of the Constitution of Islamic Republic of Pakistan and his Seniority may be considered from the merit list of the Public Service Commission, Peshawar as per dictum laid down by the superior courts.
15. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under Appeal.

Call
Review


①
16. That the counsel for Petitioner/ Appellant may be allowed to argue additional grounds at the time of arguments.

It is, therefore, humbly prayed that on gracious acceptance of the instant Service Appeal, the impugned NOTIFICATION OFFICE NO. SO(E-I)E&AD/2-4/2022 DATED 5/9/2022 may please be set aside/nullified and modified to the extent of promotion of juniors of appellant and the appellant may please be considered for promotion with his batch mates.

Any other relief deems fit and appropriate in given circumstances may also be granted in larger interest of justice.

Yours Humble Appellant


(Nisar Muhammad Khan)
Through Counsel


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

Dated: 30/01/2023

BEFORE THE NWFLP SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. _____/2023

Nisar Muhammad Khan
(Appellant)

Versus

Govt; of KPK etc
(Respondents)

VERIFICATION

Verified on oath at DIKhan, this _____th day of January, 2023, that all contents of the above appeal are true and correct. That earlier a service appeal of the appellant has been filled wherein seniority list issued Notification NO.1594/SE-1 DATED 05/08/2022 is under challenged.


30/01/2023


Appellant

AFFIDAVIT

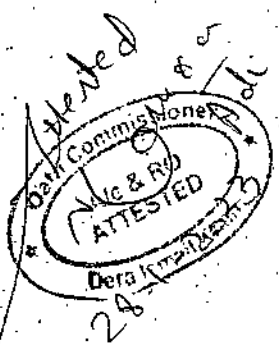
I, **Nisar Muhammad Khan**, appellant herein, do hereby solemnly affirm on oath that all para wise contents of the accompanying appeal are true and correct to the best of my knowledge, belief and information; that nothing has been concealed or kept secret from this worthy Tribunal.

30/01/2023


Deponent

CNIC No: 11201-0345282-9.

Mob No: 03322007953.



(7)

(8)

Annexure "A"

~~SECRET~~

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

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

Sir,

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

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

NO. 1574-25/E-II, Dated Peshawar the 13-12-94.

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

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

2320/E
13/12/94

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

Encl: 2

3-12/95 F

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

13/12/94

AMANGUL

Attended to be true
copy. *[Signature]*

Reference No. 27499

Confidential

To: Secretary,
Public Service Commission
Peshawar Cantt.

To: The Secretary,
Dept. of MWFP,
Home and Tribal Affairs Deptt.
Peshawar.

No. 1427-EXAN

Dated 27.11.1994.

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

Sir,

With reference to the correspondence resting with your letter No. SO(P.I)HD/3-22/8.13.3 dated 4.11.1993 on the subject noted above, I am directed to state that the Commission recommends the following for appointment as Assistant Sub-Inspector of Police:-

Range	Merit Order	Recommendee	Rank	Domicile
Peshawar				
(Number of Vacancies:8)				
"	8	Jamroz Khan Imsoil Khan	S/O	Khyber Agency
"	17	Asfendiyar Khan Semiullah Khan	S/O	Charsadda
"	19	Sabir Khan Awal Khan (Ex-Serviceman)	S/O	Peshawar.
"	20	Afrasyab Hussain Mirza S/O Zafaroyab Hussain Mirza	S/O	Peshawar.
"	37	Saifur Rehman Mirza Khan	S/O	F.R. Peshawar.
"	41	Nisar Ahamed Khan S/O Mawminullah	S/O	Mohmand Agency
"	43	Tariq Iqbal Mohammad Yousof	S/O	Peshawar.
"	52	Tariq Habib Nisar Habib	S/O	Peshawar
Range	MERIT ORDER	RECOMMENDED		DOMICILE

Merits:

Number of Vacancies	Rank	Name	Domicile
7	S/O	Abdul Naeem	Horidan
13	S/O	Shokat Ali Amrullah	Swabi
14	S/O	Nisar Mohammad Wali Mohammad	Swabi

*Attached to be
G.M. copy
C.M. copy*

"	19	Sajjad Ahmad S/O Abdul Khalik	Swabi
"	24	Fazle Rabbi S/O Fazle Elahi	Swabi
"	29	Ashfaq Ahmad S/O Za'noor 'Abidin	Swabi
"	30	Abdus Samad S/O Haji Tawar Khan	Mardan
"	33	Mushtaq Ahmad S/O Mohammed Shah	Mardan
"	35	Shah Hussain S/O Sher Hussain	Mardan
"	45	Muzamil Shah S/O Rahim Isd	Swabi U.S.A.
"	48	Sohibzada Sajjad Ahmad S/O Nisar Mohammad	Swabi
"	59	Nazir Khan S/O Shamshad	Mardan

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

HAZARA

Number of Vacancies-4

"	2	Mohair Mohammad S/O Malek Abdul Aziz	Abbottabad
"	4	Tahir Iqbal S/O Mohammad Iqbal	Abbottabad
"	5	Qamar Hayat S/O Haider Aman	Haripur
"	6	Sahidur Rehman S/O Fazlur Rehman	Haripur

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

MALAKAND

Number of Vacancies-2

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

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

Number of vacancies

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

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

Banna

Number of Vacancies-3 16

"	3	Mohammad Shafiqat Khan S/O Gulab Khan	Banna
"	16	Azmat Ali Khan S/O Abdul Karim Khan	Banna
"	26	Najeebullah S/O Noor Mohammad	Banna

RANGE D. I. KHAN	NETIR ORDER	RECOMMENDEE	DOMICILE
"	27	Hanifullah Khan Wazir S/O Abu Khan	F.R. Bannu
"	31	Ishtiaq Ahmed S/O Hammad Khan	Lakki Marwat
"	32	Nisar Mohammad Khan S/O Gul Mohammad Khan	Lakki Marwat
"	38	Faridullah S/O Mohammad Nawaz Khan	Bannu
"	39	Aslam Nawaz S/O Gul Nawaz	Bannu
"	54	Ismetullah Khan S/O Ghulam Habib Khan	Lakki Marwat
"	57	Majeedur Rehman S/O Mir Rais Khan	Bannu
"	58	Mustafa Khalid Pasha S/O Fazal Malook	Bannu
"	66	Mohammad Tahir Khan S/O Behl Khan Khan	N.W. Agency
"	71	Mohammad Tahir Shah S/O Mohammad Sadiq Khan	F.R. Bannu
"	73	Mohammad Afzalsayab Hassan S/O Mohammad Khan	Bannu
"	76	Shabir Hussain Shah S/O Malik Mir Shah	Bannu
"	79	Zafarullah Khan S/O Abdullah Khan	Bannu

Number of vacancies-8

"	1	Abdul Hai Khan S/O Ahmad Hammad Khan	D. I. Khan
"	13	Syed Inayat Ali Amjad S/O Syed Mureed Ali Shah	D. I. Khan
"	15	Kalimullah S/O Hafiz Bashir Ahmed	D. I. Khan
"	23	Zia Hasnaba S/O Gul Hassan	D. I. Khan
"	25	Sahib-ud-Din Syah S/O Rehmetullah Khan	Rank
"	28	Shahzadullah Khan S/O Amanullah Khan	D. I. Khan
"	45	Mohammad Nadeem Siddiqi S/O Ghulam Yasin	D. I. Khan
"	47	Tauhid Khan S/O Abdul Hamid Khan	D. I. Khan

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

	Peshawar	Mardan	Nowshera	Malakand	Kohat	Bannu	D. I. Khan
Vacancies	8	12	4	2	4	16	0
Adjusted	8	12	4	2	4	16	8
Balance							

Next Page 3

*Attended to me
C. M. Khan*

(3)

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

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

Your Obedient Servant

(ABDUL HUSSAIN)
DIRECTOR EXAMINATION
MPP PUBLIC SERVICE COMMISSION.

13.12.98

X.L.B.

S.L.B.

[Handwritten signature and notes]

[Faint stamps and markings]

~~ANNEXURE~~ I

2) The Superintendent of Police, Lakki.

No. 110-41 /SS Dated Bannu, the 5/1 / 1995.

Subject :- DIRECT RECRUITMENT OF ASSTTS. SUB INSPECTORS.

U.S.A.P.

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

S.L.No.	Name & Address.	Range No. allotted.	Name of District.
1.	Mr. Mohammed Shafiqat Khan s/o Gulap Khan r/o Mohallah Musunin Abo, House No. 669/A, Bannu City.	4/B	Bannu Distt:
2.	Mr. Azmat Ali Khan s/o Abdul Karim Khan r/o Arsela Gachan Khel, Chor-iwala Bannu.	7/B.	-do-
3.	Majidullah Khan s/o Noor Mohammad r/o Kotka Amin Khan Jabu Khel, Lakki Marwat.	9/B	-do-
4.	Hanifullah Khan Wazir s/o Abu Khan R/o Idal Khel Mastai Khel Wazir, F.R. Bannu.	11/B.	-do-
5.	Iqbal Ahmed s/o Haqqud Khan r/o Hayat Khel, Lakki Marwat.	14/D.	Lakki Distt:
6.	Mirza Mohammad Khan s/o Gul Mohammad, r/o Mohallah Jor Musaffar Khan, Lakki Marwat.	17/B.	-do-
7.	Fariqullah Khan s/o Mohammad Nawaz r/o Mohallah College Street near, Govt. High School No. 2, Bannu City.	23/B	Bannu Distt:
8.	Mulla Ahmad s/o Gul Ahmad r/o Ismail Khel Bannu.	24/B.	-do-
9.	Imamullah Khan s/o Ghulam Habib Khan, r/o Moh. Lakki Gachan Khel, Lakki.	29/B	Lakki Distt:
10.	Muhammad Rehan s/o Mir Raja Khan, r/o Moh. Mohallah Advocate House No. 156/B, Bannu City.	39/B	Bannu Distt:
11.	Muhammad Khalid Khan s/o Fazal Khan, r/o Moh. Mohallah Bannu.	49/B	-do-

Attached is be
have copy
Adrian
Kamala

Attached to be
copy. M. Chaudhry

L
J
L
S
U
S
J

50

- 1. Mohammed Tahir Shah u/o 75/D Dandi Distt:
Mohammed Ghalq Khan,
r/o Jalka Teezla, P.N. Bannu.
- 14. Mohammed Afrazayab Hassan u/o Mohammed 76/D -do-
Hassan Khali Kotla Sikandar Khan,
Bannu.
- 15. Shabir Hussain Shah u/o Malik 77/D -do-
Mir Shah, r/o Goraka Saeed Khel,
Lakki Marwat.
- 16. Safullah Khan u/o Abdullah Khan, 78/D -do-
Koh: Ghazal Khel, Distt: Bannu.

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

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

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

H-2/S/12
For info of
compliance report

*Attached to be kept
Copy. Adh. to
K.M.W.*

(D)
Superintendent of Police
LAKKI MARWAT
8/11/85

*Attn. to
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16

Annexure B

POLICE DEPTT:

BANNU RANGE.

ORDER

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

S. NO.	Name & Number.	District.	Date.
1.	PASI AZHAR ALI No. 7/B	Bannu Distt.	1.1.1998
2.	" Hanifullah Khan No. 11/B	-do-	-do-
3.	" Faridullah Khan 23/B	-do-	-do-
4.	" Mustafa Kamal Pash 49/B	-do-	-do-
5.	" Mohammad Tahir Khan 50/B	-do-	-do-
6.	" Mohammad Tahir Shah 75/B	-do-	-do-
7.	" Nisar Mohammad Khan 17/B	Lakki Distt.	-do-
8.	" Iqbalullah Khan 29/B	-do-	-do-
9.	" Shahir Hussain Shah 77/B	-do-	-do-
10.	" Zafrullah Khan No. 78/B.	-do-	-do-

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

No. 3161-62/ES.

Dated 30-12-1998.

Copies to the:-

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

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

Attached to be
True Copy
Rashid Zaidi
Khan

Attn. sent to
true copy
28/10/2013

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

17

Amended

E

13-7-2001

BANNU RANGE.

ORDER.

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

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

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

No. 1891-94 / ES

Dated Bannu, the 20-7-2001.

Copies forwarded for information and necessary

action to :-

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

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

*Attached to be
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24/07/2001*

Amended

POLICE DEPTT.:

BANNU REGION.

O R D E R.

The following Asstt. sub_Inspectors, on promotion list "B" have been considered suitable for promotion as offg. sub_Inspectors by the Range selection Board, in the meeting, held in Range office, Bannu on 08.04.2004.

On promotion, they are posted to Bannu Distt.:

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

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

Necessary gazettee notification may be issued to all concerned.

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

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

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

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

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A. Anwar
Khan

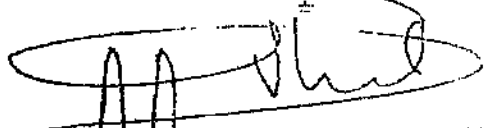
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Amir E

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

Necessary Gazette notification be issued with intimation to all concerned.

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


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

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

Copy to:

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

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Kamran*



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

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

Dated: 25/08/2022

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

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

Attested date
25/08/2022
25/08/2022
25/08/2022

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13,18	D.O Promotion as DSP
20	Mr. Khabir Muhammad	01.01.1972	Abbottabad	26.04.2000	26.04.2002	12.09.2014
21	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	26.04.2000	26.04.2002	08.04.2016
22	Mr. Qamar Hayat	08.04.1971	Haripur	26.04.2000	26.04.2002	07.11.2012
23	Mr. Ijaz Ahmad	05.04.1963	Mansehra	26.04.2000	26.04.2002	12.09.2014
24	Mr. Arshad Mehmood	15.08.1964	Mansehra	26.04.2000	26.04.2002	12.09.2014
25	Muhammad Javed	03.06.1963	Mansehra	26.04.2000	26.04.2002	27.10.2015
26	Mr. Falak Niaz	01.04.1965	Swabi	02.05.2000	02.05.2002	07.11.2012
27	Mr. Tajamul Khan	30.09.1965	Swabi	03.07.2000	03.07.2002	24.01.2014
28	Mr. Tariq Habib	05.09.1968	Peshawar	20.09.2000	20.09.2002	31.03.2012
29	Mr. Nisar Ahmad	02.11.1973	Charsadda	20.09.2000	20.09.2002	31.03.2012
30	Mr. Tariq Iqbal	13.04.1974	Peshawar	20.09.2000	20.09.2002	31.03.2012
31	Mr. Aslam Nawaz	01.03.1972	Bannu	20.09.2000	20.09.2002	31.03.2012
32	Mr. Ishtiaq Ahmad	01.11.1971	Lakki	20.09.2000	20.09.2002	07.11.2012
33	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	29.01.2001	29.01.2003	19.07.2013
34	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	01.06.2001	01.06.2003	25.03.2013
35	Mr. Ifikhar Shah	30.04.1966	Mardan	02.06.2001	02.06.2003	25.03.2016
36	Mr. Noor Jamal	10.01.1966	Mardan	31.07.2001	31.07.2003	31.03.2012
37	Syed Mukhtiar Shah	18.10.1967	Haripur	17.11.2001	17.11.2003	24.01.2014
38	Mr. Nazir Ahmad	02.02.1970	Abbottabad	17.11.2001	17.11.2003	07.11.2012
39	Mr. Saeed Akhtar	02.02.1971	Haripur	17.11.2001	17.11.2003	07.11.2012
40	Mr. Niaz Gul	07.03.1971	Abbottabad	17.11.2001	17.11.2003	24.01.2014
41	Mr. Muhammad Ishtiaq	04.05.1973	Mansehra	17.11.2001	17.11.2003	24.01.2014
42	Mr. Muhammad Maroof	05.10.1974	Abbottabad	17.11.2001	17.11.2003	02.04.2015
43	Mr. Muhammad Ayaz	03.03.1975	Abbottabad	17.11.2001	17.11.2003	07.11.2012
44	Muhammad Jamil Akhtar	22.02.1977	Haripur	17.11.2001	17.11.2003	07.11.2012
45	Mr. Abdul Hai Khan	01.08.1972	D.I.Khan	23.11.2001	23.11.2003	19.07.2013
46	Syed Inayat Ali Shah	10.01.1972	D.I.Khan	23.11.2001	23.11.2003	24.01.2014
47	Mr. Niaz Muhammad	11.02.1971	Swabi	29.11.2001	29.11.2003	25.03.2013
48	Mr. Hameed Ullah	25.04.1974	Mardan	01.12.2001	01.12.2003	24.01.2014
49	Mr. Sajjad Ahmad	01.04.1968	Swabi	01.12.2001	01.12.2003	25.03.2013
50	Mr. Shah Hassan	01.05.1968	Mardan	01.12.2001	01.12.2003	08.04.2013
51	Mr. Nazir Khan	18.10.1970	Mardan	01.12.2001	01.12.2003	19.07.2013
52	Sajjad Ahmad Sahibzada	02.02.1971	Swabi	01.12.2001	01.12.2003	08.04.2013
53	Mr. Muzamil Shah	08.03.1972	Swabi	01.12.2001	01.12.2003	25.03.2013
54	Mr. Mushtaq Ahmad	15.03.1970	Swabi	01.12.2001	01.12.2003	25.03.2013

Attached to be
 Late
 Abdul Qadir
 Mardan

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

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

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

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

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Checked by
 Adm. Secy
 Manshera

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

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

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(DR. )
AIG/Establishment
PSP

For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

st: No. & date even.
y to all concerned

Alleged to be kept
copy, Adv. Gen.
Karakul

(28)

Annexure G



OFFICE
COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA PESHAWAR
Email: comdfrp@peshawar.gov.pk
Ph. No. 091-92111111 (ext. 091-92111111)

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

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

Subject: - RESTORATION OF SENIORITY.

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

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

COMMANDANT,
Frontier Reserve Police,
Khyber Pakhtunkhwa,
Peshawar.

BU
15/08/22

Requested to be
have copy.
Adv. for
15/08/22



29

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

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

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


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

Subject:- RESTORATION OF SENIORITY.

Memo:-

Kindly refer to the case noted above in the subject.

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


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

Attached to be
true copy.
Adv. Zain
Khan

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

Through: Proper Channel.

Subject:- RESTORATION OF SENIORITY.

Memo:-

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

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

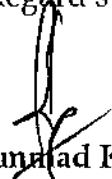
It is further added that in the seniority list of DSsP issued vide CPO Khyber Pakhtunkhwa Peshawar No.352/SE-I dated 21.02.2022, the applicant name was shown at Serial No.61 and in the Final Seniority List issued vide No.1594/SE-I dated 05.08.2022, the applicant name is shown at Serial No.83.

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

I shall remain thankful and obliged.

Dated :-

Regard's



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

Attached to be
be Sec copy
Advizor
Kamran



(31)

Annexure "H"

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Dated Peshawar the September 05, 2022

NOTIFICATION

NO.SO(E-I)ESAD/2-4/2022, On the recommendations of the Departmental Selection Board, in its meeting held on 19.08.2022 and subsequent approval of the Chief Minister, Khyber Pakhtunkhwa being Competent Authority, the following Deputy Superintendents of Police (BS-17) are hereby promoted to the rank of Superintendents of Police (BS-18), on regular basis, with immediate effect :-

Sr. No	NAME OF OFFICERS	Sr. No	NAME OF OFFICERS
1	Mr. Oaid Kamal	2	Mr. Muhammad Aleem Jan
3	Mr. Muhammad Aul	4	Mr. Muhammad Shafia
5	Mr. Muhammad Aul	6	Mr. Sanaullah
7	Mr. Mukhtar Ahmad	8	Mr. Tahir-Ul-Rehman
9	Mr. Muhammad Suleman	10	Mr. Tahir Iqbal
11	Mr. Khabir Mahmood	12	Mr. Qamar Hayat
13	Mr. Lalai Riaz	14	Mr. Tajamul Khan
15	Mr. Tauq Habbib	16	Mr. Hissar Ahmad
17	Mr. Tauq Iqbal	18	Mr. Aslam Nawaz
19	Mr. Ishaq Ahmad	20	Mr. Rukhat Shah
21	Mr. Noor Jaman	22	Mr. Mukhtar Shah
23	Mr. Nazir Ahmad	24	Mr. Saeed Akhtar
25	Mr. Muhammad Ishaq	26	Mr. Muhammad Maroof
27	Mr. Muhammad Ayaz	28	Mr. Muhammad Jamil Akhtar
29	Mr. Abdul Haq	30	Mr. Anayat Ali Shah
31	Mr. Riaz Muhammad	32	Mr. Ganeed Ullah
33	Mr. Sayad Ahmad	34	Mr. Shah Hassan
35	Mr. Raza Khan	36	Mr. Faqir Ahmad Safabzada
37	Mr. Muhammad Shah	38	Mr. Mushiq Ahmad
39	Mr. Shaikat Ali	40	Mr. Abdul Samad
41	Mr. Muhammad Khafid	42	Mr. Sa Hassan
43	Mr. Shahullah	44	Mr. Sohail Afzal
45	Mr. Mu Faraz	46	Mr. Muhammad Asif

2. The officers, on promotion, will remain on probation for a period of one year or till retirement, whichever is earlier, in terms of Section-6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Promotion of the officers stood at Sr. No. 33 to 43 shall be subject to the decision of the Superior Judiciary and Cabinet regarding the issue of "out of turn promotion" and absorption in Khyber Pakhtunkhwa Police from other Provinces/Departments.

Attached to be
true copy.
All
[Signature]



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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

1. Posting/transfer orders will be issued by Provincial Police Officer, Khyber Pakhtunkhwa.

CHIEF SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA.

Endst. No. & date even.

Copy of above is forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Secretary to Govt. of Khyber Pakhtunkhwa, Home & TAs Department.
4. Provincial Police Officer, Khyber Pakhtunkhwa.
5. Accountant General, Khyber Pakhtunkhwa.
6. Capital City Police Officer, Khyber Pakhtunkhwa.
7. All Regional Police Officers in Khyber Pakhtunkhwa.
8. Director, Information, Khyber Pakhtunkhwa.
9. PSO to Chief Secretary, Khyber Pakhtunkhwa.
10. PS to Chief Secretary, Khyber Pakhtunkhwa.
11. PS to Secretary Establishment/PS to SS(E)/SS (Reg)/PA AS(HRD)/DS(E)/SO(E II) Establishment Department.
12. PS to Secretary (Admin)/D.S(A)/SO(Secret)/ Director Protocol/ Estate Officer/ACSO Cypher/Deputy Director (IT) Administration Department, Khyber Pakhtunkhwa.
13. Officers concerned.
14. Manager, Govt. Printing Press Peshawar.


5/9/2022
SECTION OFFICER (ESTT-1)

THROAD KISAN...
12

Attention to
Civil Dept.
24/10/2022



33

Annexure-I

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

Ph: No. 0966-9280111
Fax No. 0966-9280142

No. 1761 /FRP, dated DIKhan the 30 /09/2022


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

Subject:- APPEAL.

Memo:-

Kindly refer to the case noted above in the subject.

It is submitted that an appeal in respect of undersigned against the impugned Notification No.SO(E-I)E&AD/2-4/2022 dated 05.09.2022 is enclosed herewith for onward submission to CPO Peshawar, please.


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

Attention to the true copy.
see
Mawla

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OFFICE OF THE COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA, PESHAWAR
Ph: No. 091-9214114 Fax No. 091-9212602

No. 8078 /SI Legal, dated 3/11/2022.

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

Subject: APPEAL.

Memo:

Enclosed kindly find herewith a representation submitted by Mr. Nisar Muhammad Khan posted as SP FRP DI Khan Range, DI Khan (on acting charge basis) against the impugned Notification issued by the Government of Khyber Pakhtunkhwa, Establishment Department vide No. SO(E-I)E&AD/2-4/2022, dated 05.09.2022, for perusal and further necessary action please.

(Enclosed= 27 pages)

o/c Deputy Commandant,
Frontier Reserve Police, Peshawar.
Khyber Pakhtunkhwa, Peshawar.

*APPEAL to be true
copy
not attached
28/10/2023*

35

BEFORE THE HONORABLE INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA, PESHAWAR

Through Proper Channel

DEPARTMENTAL APPEAL/REPRESENTATION AGAINST THE IMPUGNED
NOTIFICATION OFFICE NO. SO(E-I)E&AD/2-4/2022 DATED 05/09/2022
WHEREBY SOME OF THE JUNIORS HAS BEEN PROMOTED TO THE RANK
OF SUPREINTENDENT OF POLICE (BS-18) ON REGULAR BASIS AND THE
APPLICANT HAS BEEN DEPRIVED OF HIS DUE RIGHT OF PROMOTION
AND DISCRIMINATION HAS BEEN MATED OUT.

Respected Sir;

1. That the applicant is serving as Deputy Superintendent of Police (BS-17) and currently posted as Superintendent of police in FRP Police Dera Ismail Khan.
2. That the applicant was appointed as Assistant Sub Inspector (BS-9) in KPK Police Department on the recommendation of KPK Public Service Commission on 09/01/1995 in **Bannu** region. In the merit list assigned by the Public Service Commission, the applicant stood at Serial No.32 in the merit Order vide secretary Public Service Commission, NWFP, Peshawar memo No. 5427/EXAM dated 22/11/1994.
3. That after completion of successful probation period the applicant was confirmed as ASI effective from the date of appointment i.e 09/01/1995 vide Regional Police Officer Bannu Region Order Endst: No. 3161-62/ES dated 30/12/1998.
4. That in spite of having unblemished service and in the absence of anything adverse, the applicant was belatedly brought on list "E" on 13/07/2001 vide Regional police office bannu Region Order No. 1891-94/ES dated 20/07/2001 instead of from the date of confirmation i.e 30/12/1998. The applicant was not given inter-se seniority among his batch mates as per merit assigned by KP public service Commission. And due to late confirmation as SI seniority of applicant was disturbed which might be a clerical mistake, which travelled along the seniority of the applicant and culminated in to final seniority list issued vide impugned seniority list No. 1594/SE-I dated 05/08/2022. That name of the applicant was wrongly shown in seniority list issued on 05/08/2022.

5. That after the issuance of impugned seniority list dated 05/08/2022, being continuance cause of action, the applicant preferred a departmental appeal on 12/08/2022. Copy of the a departmental appeal is annexed as "Annexure-A".
6. That the spite pending the departmental appeal of the applicant, the impugned promotion notification Order No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 has been issued and promoted some of the juniors from the applicant. Copy of the order dated 05/09/2022 is annexed as "Annexure-B".
7. That to the dismay of the applicant, his position has been disturbed by the dint of impugned Seniority List, depriving the applicant wrongly of his Seniority position by placing him at serial No-83 much below to his junior while the initial merit of Public Service Commission ensures without change in subsequent events concerning Seniority of batch-wise contemporaries.
8. That the applicant being aggrieved Civil Servant has a right and cause of action to file instant departmental appeal inter alia on the following grounds.

GROUNDS

1. That department appeal of the applicant against the impugned seniority list issued vide No. 1594/SE-I dated 05/09/2022 has been pending and without rectifying/correcting the seniority list, the issuance of impugned notification 05/09/2022 against the mandate of law and service rules and also against the actual seniority position of the applicant.
2. The applicant was selected through Public service Commission on 09/01/1995 whereas servants at Serial No. 22 to 28(in the impugned notification) were inducted via 1998 batch. It has been settled principle that servants selected through earlier selection process are always senior to the servants selected in later selection process.
3. That the Applicant has not been provided equal treatment when there is no express inhibition against him under the law and has also not been given equal protection of law, which is discriminatory instance of arbitrariness and is against the principles enshrined in Articles-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
4. That it has been clearly the mandate of law and the verdicts of the Apex Courts that discretion should be excised fairly and justly and should not be exercised arbitrarily. The belated entry of the applicant in list "E" is discriminatory and infringed the rights of the applicant. Hence, the

impugned seniority list and subsequently impugned notification dated 05/09/2022 is in violation of rules and statutory provisions as well as the dicta of superior courts pronounced in a number of judgments, hence the same needs to be corrected.

5. That in light of the relevant rules whereby seniority is reckoned in accordance with the placement of successful candidates inducted through Provincial Public Service Commission, Peshawar.
6. That vide Merit Order of secretary Public Service Commission, NWFP, Peshawar memo No. 5427/EXAM dated 22/11/1994, one Mr Abdull Hai Khan was stood at top i.e serial No.1 in DIKhan Region. His seniority was disturbed due to late confirmation in the rank of Sub Inspector and due to not maintaining the merit assigned by Public Service Commission with his batch-mates. The official preferred a service appeal No. 991/2018, titled " Abdull Hai Khan DSP Vs Govt; of KPK". The Worthy Service Tribunal established that Civil Servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter-se seniority as in the lower post. Let it not be mentioned here that Mr. Abdull Hai and the applicant belongs to the same batch. The service appeal No. 991/2018 was accepted vide judgment dated 17/12/2020. In consequence the promotion list "E" in DIKhan region has been revised.
7. That by dint of judgment of the Worthy Service Tribunal dated 17/12/2020 in Service appeal No. 991/2018 DIKhan region has revised and corrected Office Notification No. 622/ES dated 25/04/1998, the date of bringing the name of Mr. Abdull Hai, along with his batch-mates, on the promotion list "E" has been revised in the light of PR. 13.11 and 19.25(5).
8. That in view of the Rule 17 sub rule 1 (a) of the KP Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 'The Seniority inter se of civil servants shall be determined in case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission.'
9. That also according to the Rule 2 (2) of the Civil Servants (Seniority) Rules, 1993 "If two or more persons are recommended in open advertisement by the Selection Authority their inter-se seniority shall be determined in order of merit assigned by the selection authority". Moreover, incumbents from serial No. 22 to 28 in the impugned notification were inducted in 1998 batch through a subsequent advertisement and subsequent selection process.
10. That as per Rule 17 (2) of the KPK Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 "Seniority in the various cadres of the civil

servants appointed by initial recruitment vis-a vis those appointed otherwise shall be determined with reference to their dates of their regular appointment to a post in that cadre".

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

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

It is, therefore, humbly prayed that on gracious acceptance of the instant departmental Appeal, the impugned notification dated 05/09/2022 may please be set aside/nullified/modified to the extent of promotion of juniors of appellant and the applicant may also be considered for promotion with his batch mate.

Any other relief deems appropriate in attending circumstances may also be granted.

Yours Humble Applicant

(Nisar Muhammad Khan)
SP FRP D. Khan

Dated: 30/09/2022



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4
Annexure-J

**INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA**

Central Police Office, Peshawar.

No. 317 /CPB,

dated the 08 /12 /2022.

To: The Capital City Police Officer,
Peshawar.

All Regional Police Officer,
In Khyber Pakhtunkhwa.

Subject: **DECISION ON PROMOTION TO LIST 'E'**

Memo:-

In pursuance of judgment dated 24.04.2019 of Hon'ble Peshawar High Court, Peshawar while disposing of Writ Petition No. 3720-P/ 2018 titled Qazi Muhammad Arif Vs Govt. of Khyber Pakhtunkhwa followed by Khyber Pakhtunkhwa Service Tribunal, Peshawar judgment dated 30.11.2021 in Service Appeal No. 12438/2020 titled Furqan Javed SI Vs Govt. of Khyber Pakhtunkhwa etc wherein the Police Department was directed to bring the petitioners PASIs on seniority list "E" from the date confirmation of their appointments as per the spirit of Police Rules, 1934 (amended 2017).

The Constitution of Islamic Republic of Pakistan dictates equal treatment and prohibits discrimination in its Articles 4 & 25. Furthermore, the Hon'ble Supreme Court of Pakistan has held in several reported judgments that if a competent court of law decide a point of law or fact and if such decision cover not only the case of those litigating before the Court but some other also, then under the dictate of justice, the benefit of that judgment should not be restricted to those who had litigated, rather shall be equally extended to those who had not indulge in the litigation.

Foregoing in view the Competent Authority has directed to follow the following instructions in order to bring parity in promotion to list "E":

- a) All PASIs on successful completion of 03 years probation period shall be brought on promotion list 'E' from the date of appointment.
- b) All ASIs promoted from lower rank shall be brought on promotion list "E" after successful completion of two years probation period from the date of officiating promotion.

Sd/-

(SABIR AHMED) PSP

Additional Inspector, General of Police, HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

CC

- Deputy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- AIG/ Establishment, Khyber Pakhtunkhwa, Peshawar.
- PSO to W/ IGP, Khyber Pakhtunkhwa, Peshawar.
- AIG/ Local Y1-4-2022

Attended to by
True copy
20/12/2022

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True Copy
Karnal

BEFORE THE KHYBER PAKH
TRIBUNAL, PESH

in Amended service Appeal No.991/2018

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

(Appellant)

VERSUS

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

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.991/2018

Date of Institution: 10.08.2018

Date of Decision: 17.12.2020



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

VERSUS

Government of Khyber Pakhtunkhwa through Home Secretary and 27 others. (Respondents)

Muhammad Abdullah Baloch Advocate.

For Appellant

Mr. Muhammad Jan Deputy District Attorney

For Official Respondents

Mrs. ROZINA REHMAN
Mr. ATIQ UR REHMAN WAZIR

MEMBER (ATTENDED)
MEMBER (E)

[Signature]
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

JUDGMENT:

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

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

2. Written reply/comments were submitted by respondents.

3. Arguments heard and record perused.

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

ATTESTED

Signature
Deputy Registrar
Khyber Pakhtunkhwa
Public Service Commission

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

ATTESTED

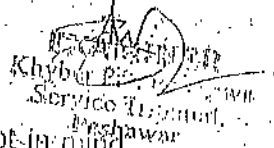
10/5
11/11/2018

The learned Deputy District Attorney appeared on behalf of official respondents stated at bar that seniority issue of the appellant was discussed in meeting of a committee constituted for the purpose on 29.11.2018 and it was

(33) (44)

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

ATTESTED



Deputy District Attorney
Khyber Pakhtunkhwa
Service Tribunal
Peshawar


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

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

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

ANNOUNCED
17.12.2020


(ROZINA REHMAN)
MEMBER (J)


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

Chief Justice

Hyderabad
Service Tribunal
Pakistan

Date of Presentation of Application 17/12/2020
Number of Pages 2000
Copies 22
Pages 0
Total 22
Date of 23/12/2020
Date of Copy 22/12/2020
Place of Delivery of Copy 22/12/2020

46

Annexure L



OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION

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

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

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

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

No. 3418/55 /ES

Copies to:-

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

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

*Abstract to be
true copy
Adv. Zor
revised*



OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION

☎ 0966-9280291 Fax: 9280290
✉ eslrc@dkk@gmail.com

(42) 117

No. 3456 /ES

dated D.I. Khan dtc.

20/05/2022

ORDER

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

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

1	2	3	4
S.No	Name & Address	Range No. Allocation	Unit to which posted
1	Abdul Hai Khan S/O Ahmad Farid Khan, P.O. Village Chahayzen, Distt. DI Khan	2707	DI Khan
2	Syed Inayat Ali Amjad S/O Syed Mirza Ali Shah, P.O. Village Thathal, P.O. Mandihera, Kohat, Chashma Road Distt. DI Khan	2800	DI Khan
3	Kalim Ullah S/O Hafiz Bashir Ahmed, P.O. Haji Morab DI Khan	3700	DI Khan
4	Zia Hassan S/O Gul Hassan, Village Khairu Kher, DI Khan	4900	Tank
5	Sahib-ud-Din Ayub S/O Rehmatullah Village & P.O. Daraki, Tehsil & District Tank	4600	Tank
6	Shafiqullah Khan S/O Amrullah Khan Village & P.O. Madhal, Tehsil Kudaold, District DI Khan	4700	Tank
7	Mohammad Nazam Siddiqi S/O Ghulam Yaseen, Siddiqi House, Faqir Abas Bichhal, Commerce College DI Khan	4100	DI Khan
8	Fauhid Khan S/O Abdul Hamid Khan, Village Keri Malang, District DI Khan	4900	DI Khan

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

No. /ES,
Copies to:-

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

Muzafar
Copy
Advisor
Vanu

(SEADKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan



OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION
☎ 0966-9200291 Fax # 9200290
✉ est.dixalk@gmail.com

No. /ES
ORDER

dated D.I.Khan the

3.12.2022

In compliance with the execution Judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020 in Service Appeal No.991/2018, titled Abdul Hai Khan, Deputy Superintendent of Police Vs Govt. of Khyber Pakhtunkhwa, through Home Secretary and 27 others, & direction of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPB/421 dated 16.11.2021, this office Order No.315-17/ES dated 09.03.1998 and in continuation with this office Order No. 344B-55/ES, dated 30.05.2022, and in supersession of this Order No.315-17/ES dated 09.03.1998 (wherein name of the petitioner Abdul Hai DSP was relegated to serial no. 4 from serial no. 01 in violation of this office Order No.236-38/ES dated 01.02.1995 (order of his initial appointment) while confirming him in his substantive rank of Assistant Sub-Inspector (ASI), his order of seniority viz a viz his batchmates is hereby restored to its original order as provided in the order of their initial appointment vide this office Order No.236-38/ES dated 01.02.1995 in the manner provided in the following table:

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

1	2	3	4
S/No	Name & Address	Range No. Allotted	Dist. To which posted
1	Abdul Hai Khan S/O Ahmad Saeed Khan, R/O Village Chahdwan, Distt. DI Khan	27/D	DI Khan
2	Syed Inayat Ali Amjad S/O Syed Muneer Ali Shah, R/O Village Thalhal, P.O Mandirwan	28/D	DI Khan
3	Kalim Ullah S/O Hafiz Bashir Ahmad, P.O Haji Morat DI Khan	37/D	DI Khan
4	Zia Hassan S/O Omi Hassan, Village Khairi Khel, DI Khan	43/D	Tank
5	Enab-ud-Din Ayub S/O Rehman Allah Village & P.O. Darrak, Tehsil & District Tank	46/D	Tank
6	Shafiqullah Khan S/O Amrullah Khan Village & P.O Maddal, Tehsil Kuluclai, District DI Khan	47/D	Tank
7	Mohammad Nadeem Siddiqi S.O Ghulam Yaseen, Siddiqi House Faqir Abad Bahawal Commerce College DI Khan	48/D	DI Khan
8	Tauheed Khan s/o Abdul Hamid Khan, Village Kiri Malang, District DI Khan	49/D	DI Khan

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

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

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

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

Attached to be true
Copy - Adl Foz
Kamran



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OFFICE OF THE REGIONAL POLICE OFFICER, DERA ISMAIL KHAN REGION, 0966-9280291 Fax # 9280290, cell.no.0116@rcmail.com

ORDER/REVISION OF THE PROMOTION LIST "E" AS IT STOOD ON 31.12.1998 dated D.I Khan, Dte

202 / 30/05/2022

In compliance with the execution Judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020 in a case Appeal No.991/2018, titled Abdul Halim Khan, Deputy Superintendent of Police Vs. Govt. of Khyber Pakhtunkhwa, through Home Secretary and 27 others, & directions of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPD/421 dated 16.11.2021, & in supersession of all previous orders issued by this office, from time to time, with regard to the dates of bringing names of the petitioner and respondents of the said Service Appeal No.991/2018 on the Promotion List E, severally and collectively, and in the exercise of powers conferred on me by PR, 13.11 of the Police Rules, 1934, read with the Promotion Policy, provided in the Establishment Code Khyber Pakhtunkhwa (ESTC CODE) (Revised Edition) 2014, and in the continuation of this office under Nos. 3448-55/BS dated 30.05.2022, 3497-64/BS dated 30.05.2022, 3466-75/BS dated 30.05.2022 and 3477-86/BS dated 30.05.2022; the Promotion List E as it stood after 30.05.2022, is hereby revised in the manner provided in the table below to the extent of police officers of serial No. 34 to 41 only.

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

Table with 6 columns: Serial No., Order of Seniority on the Promotion List E as it stood before 30.05.2022, Revised Order of Seniority as it stood after 30.05.2022, Name & Address, Previous Dates of Admission into the Promotion List E, Revised Dates of Admission into the Promotion List E. Rows 1-42.

No 3488-96 RES.

Copies to:-

- 1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for the use of information w.r.t letter No. quoted above, please.
2. The Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar, w.r.t letter No. 1118/ST dated 20.12.2020, please.
3. The District Police Officers, DI Khan & Tank.
4. Mr. Abdul Halim Khan, DSP, Assistant Director, Anti-Corruption Establishment DI Khan
5. Mr. Syed Inayat Ali Amjad, DSP, Acting SP Investigation, Kohat
6. Mr. Zia Hassan, DSP, Acting SP Investigation, Dera
7. Mr. Saleh ud Din, DSP, SP Security, CCP Peshawar
8. Mr. Shahid Ullah, DSP, Acting DPO Karak
9. Mr. Farheed Khan, DSP, Acting SP Special Branch, South of Dera

(SHAHKAT ABBAS) PSP Regional Police Officer Dera Ismail Khan

Attested to be true Copy - Adv. Farid Hussain

(SHAHKAT ABBAS) PSP Regional Police Officer Dera Ismail Khan



OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION

☎ 09669280281 Fax: 0280290
✉ est@ra.ilk@pakmi.com

(45) (50)

No. /ES dated D.I.Khan the 10/05/2022
ORDER

In compliance with the execution Judgment of the Honorable Service Tribunal Peshawar, dated 17.12.2020, in Service Appeal No.991/2018, titled: Abdul Haq Khan, Deputy Superintendent of Police Vs. Govt. of Khyber Pakhtunkhwa, through Home Secretary and 07 others, & direction of the Inspector General of Police Khyber Pakhtunkhwa, Peshawar, vide letter No. CPO/CPS/421 dated 16.11.2021 and in continuation with this office Order No. 3443-55/ES, dated 30.05.2022, and Order No. 3457-64/ES dated 30.05.2022 and this office Order No. 3466-75/ES dated 30.05.2022 & in the supersession of this order of bringing their names on the Promotion List E, issued vide this office Notification No.622/ES, dated 25.04.1998, the date of bringing his name, along with that of his batchmates, on the Promotion List E, is hereby revised in the light of PR. 13.11 and 19.25(5), and judgement of the Honourable Supreme Court of Pakistan in case titled: Gul Hassan Jatoi and others Vs Faqir Muhammad Jatoi and others, reported in 2016 SCMR 1254, in the manner provided in the following table:

Table showing inter-se seniority of ASIs appointed by way of initial appointment vide office Order No. 233-38/ES dated 01.02.1995 on the Promotion List E

Sr No	Name & Address	Range No. Allotted	Dist. in which posted	Previous Date of bringing their names of the Promotion List E	Revised Date of bringing their names of the Promotion List E
1	Abdul Haq Khan, S/O. Ahmad, Saeed Khan, R/O Village Chahdwan, Dist. DI Khan	27/D	DI Khan	25.04.1998	02.02.1998
2	Syed Inayat Ali Anjum S/O Syed Mirza Ali Shah, R/O Village Thahini, P.O. Mahdhan, Kalay Chahdwan Road Dist. DI Khan	28/D	DI Khan	25.04.1998	02.02.1998
3	Khalid Ullah S/O Hafiz Basir Ahmad, P.O. Haji Khan DI Khan	37/D	DI Khan	25.04.1998	02.02.1998
4	Zia Hassan S/O Gul Hassan, Village: Khanam, Khel, DI Khan	45/D	Tank	25.04.1998	02.02.1998
5	Salah-ud-Din Ayub S/O Rehmatullah Village & P.O. Dargahi, Tehsil & District Tank	46/D	Tank	25.04.1998	02.02.1998
6	Shahidullah Khan S/O Amanullah Khan Village & P.O. Maddai, Tehsil Kufachi, District DI Khan	47/D	Tank	25.04.1998	02.02.1998
7	Mohammad Nadeem Siddiqi R/O Ghulam Yaseen, Siddiqi House Fozil Abad, Behind Commerce College DI Khan	48/D	DI Khan	25.04.1998	02.02.1998
8	Fahid Khan s/o Abdul Hamid Khan, Village-Kirri Ahlang, District DI Khan	49/D	DI Khan	25.04.1998	02.02.1998

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

No. 3477-8/ES.
Copies to:

- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for favour of information w.r.t letter No. quoted above & encs.
- The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- The District Police Officer, DI Khan, to issue gazetted notification accordingly.
- The District Police Officer, Tank, to issue gazetted notification accordingly.
- Mr. Abdul Haq Khan, DSP, Assistant Director, Anti-Corruption Establishment, DI Khan
- Mr. Syed Inayat Ali Anjum, DSP, Acting SP Investigation, Kohat
- Mr. Zia Hassan, DSP, Acting SP Investigation, Bannu
- Mr. Salah ud Din, DSP, SP Security, CCP Peshawar
- Mr. Shah Ullah, DSP, Acting DPO Karak.
- Mr. Tauheed Khan, DSP, Acting SP Special Branch, South at Bannu.

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan



OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION

0966-9280291 Fax # 9280290
estl.rpo.dik@gmail.com

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

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

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

1	2	3	4	5	6
S/No	Name & Address	Range No. Allotted	Distt. To which posted	Previous date of promotion as Sub Inspector	Revised Date of Promotion as Sub-Inspector
1	MR. Abdul Hai Khan, Assistant Sub-Inspector	27/D	DI Khan	24.01.2002	23.11.2001
2	MR. Syed Inayat Ali Amjad, Assistant Sub-Inspector	28/D	DI Khan	24.01.2002	23.11.2001
3	MR. Kalim Ullah, Assistant Sub-Inspector	37/D	DI Khan	23.11.2001	23.11.2001
4	MR. Zia Hassan, Assistant Sub-Inspector	45/D	Tank	25.01.2002	13.12.2001
5	MR. Salah-ud-Din Ayub, Assistant Sub-Inspector	46/D	Tank	23.11.2001	24.01.2002
6	MR. Shafiullah Khan, Assistant Sub-Inspector	47/D	Tank	13.12.2001	24.01.2002
7	MR. Mohammad Nadeem Siddiqi Assistant Sub-Inspector	48/D	DI Khan	24.01.2002	24.01.2002
8	MR. Tauheed Khan, Assistant Sub-Inspector	49/D	DI Khan	23.11.2001	23.01.2002

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

No. 4576-78/ES,

Copies to:-

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

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

Attached to
the above copy
Adv. Zia
Khan

29/06/2022



52

OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION

0966-9200291 Fax # 9280290
esllupo.dik@gmail.com

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

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

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

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

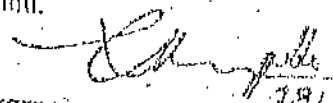
No. 4580-88/ES,

Copies to: -

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

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

Attested
by
copy
Ad
Kamran


(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan
29/08/22

(53)

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

SERVICE APPEAL NO. 2283/2022

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

Appellant

VERSUES

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

.....**Respondents**

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

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

Respected Sir;

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

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

Admitted
Bannu

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


GROUNDS

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

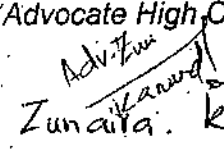
Asst. Com.
12/07/2001

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

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

Yours Humble Appellant

 (Nisar Muhammad Khan)
 Through Counsel

Dated: 12/12/2022

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

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

BEFORE THE NWFLP SERVICES TRIBUNAL, PESHAWAR

In Service Appeal No. 2283 /2022

Nisar Muhammad Khan
(Appellant)

Versus

Govt; of KPK etc
(Respondents)

VERIFICATION

Verified on oath at DIKhan, this th day of December, 2022,
that all contents of the above appeal are true and correct.

12/12/2022

Appellant

AFFIDAVIT

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

12/12/2022

Deponent

CNIC No: 11201-0345282-9.
Mob No: 0332200.7953.





KHYBER PAKHTUNKHWA
BAR COUNCIL

ADVOCATE HIGH COURT

MUHAMMAD ABDULLAH

Advocate

bc-09-0944

Date of Issue: June 2021

Valid upto: June 2024



وکالت نامہ

کورٹ
فیس

Before The NWFLP Services Tribunal, Peshawar

Appellant

Nisar Muhammad Khan

vs Govt of KPK

Service Appeal

باعث تحریر آنکھ

D. I. Khan

Muhammad Abdullah Baloch AHC

مقدمہ مندرجہ بالا اعنوان میں اپنی طرف واسطے بیرونی درجہ اولیٰ و ثانیٰ کی پیشگی یا تصدیق مقدمہ نام

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشگی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہونا قبول گا اور ہر وقت پکارے جانے مقابہ وکیل صاحب موصوف کو اطلاع دینے کو حاضر عدالت کروں گا اگر پیشگی پر منظر حاضر نہ ہو اور مقدمہ میری غیر جانبداری یا وجہ سے کسی طرز میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرز ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صمد مقام بکھری کے علاوہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بذریعہ تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صمد بکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی سہولت کے ذمہ دار نہ ہوں گے۔ اس کے بعد بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل سائنس پر وادعت صاحب موصوف مثل کردہ ذات خود منظور و گزشتہ ہو گا اور صاحب موصوف کو عرض دینی یا جواب دہی یا درخواست اجراء ایسے ڈگری نظر ثانی اپیل گمرانی د ہر قسم درخواست ہر قسم کے بیان دینے اور پر لائی یا ماضی نامہ و فیصلہ رٹ کے ایال ڈگری کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیش مقدمہ مرکز بیرون از بکھری صمد بیرونی مقدمہ مرکز نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا موٹی ڈگری یک طرفہ یا درخواست حکم انتہائی یا قری یا گرفتاری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا ہوگی۔ بلکہ منظور و گزشتہ دی کا اختیار ہو گا اور تمام سائنس پر وادعت صاحب موصوف مثل کردہ از خود منظور و قبولی ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ منظور یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی ایال گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیرونی کو اپنے جانے یا اپنے مراء مقرر کریں اور اپنے مشیر قانون کو بھی ہر امر میں دہی اور دینے ایال گمرانی حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہو جائے لزام ہونے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشگی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی بیرونی نہ لریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

2023

جنوری

28

مضمون وکالت نامہ مندرجہ بالا ہے اور اپنی طرح سمجھ لیا ہے اور منظور ہے

Accepted
Abdul
28/01/23

Nisar Muhammad Appellant

03146932557

Muhammad Abdullah Baloch
Advocate High Court
Peshawar



UNAIRA KANWAL

Advocate
No. 19-1197
Date of issue: June 2022
Valid upto: June 2025

Secretary
Bar Council

وکالت



Before the NAFIP Services Tribunal Peshawar

Appellant

Nisar Muhammad Khan Govt of KPK

Service Appeal

باعث تحریر آئٹم

A. Khan

Zundara Kanwal ANK

مقدمہ مندرجہ بالا اعتراضات میں اپنی طرف سے اپنے پورے جواب دہی برائے پیشی یا تغیر مقدمہ بنام
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا اپنا بریڈر یا دیگر مدد عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ پیش صاحب
 موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر متاثر حاضر نہ ہو اور مقدمہ میری غیر ہاضمی کی وجہ سے کسی طور سب سے خلاف ہو گیا تو صاحب
 موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا چھپے یا بروز تعطیل
 بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہوئے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا پیچھے پیش ہونے
 پر مقرر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے بھی
 کوکل ساختہ پر واکٹر صاحب موصوف مشن کر دے ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دکھائی یا جواب دہی یا درخواست اور پاساے دکھائی
 نظر ثانی اپنی گمانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ناگہانی راضی نامہ و فیصلہ برطرف کرنے اقبال دکھائی کا بھی اختیار ہو گا اور بصورت مقرر ہونے
 تاریخ پیش مقدمہ مزاد بیرون از کچہری صدر بیرونی مقدمہ جو کہ نظر ثانی اپیل و گمانی و برآمدگی مقدمہ یا منسوخی دکھائی کی طرف یا درخواست ہم امتحانی یا فرقی
 یا گرفتاری قبل از فیصلہ اجراءے دکھائی بھی صاحب موصوف کو بشرط فراہمی مقدمہ و گمانی کا اختیار ہو گا اور تمام ساختہ پر واکٹر صاحب موصوف مشن کر دے
 از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مزاد یا ان کے کسی بڑی کارروائی یا بصورت درخواست نظر ثانی
 اپیل گمانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا ہیر سر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دہی اور دینے
 اختیارات حاصل ہوں گے چھ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جگہ التواہ پیشے گا وہ صاحب موصوف کو حق ہو گا جو کہ
 صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی بیرونی نہ کریں اور اپنی صورت
 میں ہر کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہو گا

2023

جنوری

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مضمون وکالت نامہ مندرجہ بالا ہے اور اس کی طرح کچھ لیا ہے اور منظر ہے

Asw Zam
Khan
26/01/2023

Nisar Muhammad

appellant