

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. **7865/2021**

Tariq Usman Appellant

Versus

Provincial Police Officer and others Respondents

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Appellant

Through

SHAHID QAYUM KHATTAK
Advocate Supreme Court
of Pakistan
0333-9195776

&

SYED ROMAN SHAH
Advocate High court
Peshawar
Mob No. 0333-9195776

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. **7865/2021**

Muhammad Tariq Usman.....Appellant

Versus

Provincial Police Officer and others.....Respondents

REJOINDER ON BEHALF OF PETITIONER

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 3943

Dated 28/2/2023

Respectfully Sheweth;

Rejoinder on behalf of petitioner is as under;

Reply to the preliminary objections

The respondent has not mentioned the reason that why the appellant has no cause of action, locus standi, misjoinder and nonjoinder of the parties, estopped to file appeal, and that is why the appeal is not maintainable in the eyes of law, hence unable to file proper reply, however, he being a civil servant being aggrieved by the action and inaction filed the present appeal in accordance to law. The appellant has approached this hon'ble Tribunal after exhausting his statutory forum thus, the petitioner came to this Hon'ble Tribunal in accordance to law. Under the service law, it is the mandate and authority of the respondent to submit his documents where he is performing the duties and his documents shall be referred through proper channel, hence, all the objections are baseless and the appellant has approached this Hon'ble Tribunal in accordance to law as being an aggrieved person.

Reply to Facts: -

1. Correct to the extent that the appellant has been appointed as Probationer ASI through Khyber Pakhtunkhwa Public Service Commission on 21.10.2006. The appellant had successfully completed the A, B, C, D practical courses as submitted by the District Police Officer, Karak vide Memo: No. 16390/C dated 15.12.2009 to the Regional Police Officer, Kohat requisitioned by the latter for purpose of confirmation vide office Memo: No. 10517-22/EC dated 03.12.2009 **(already attached with Main appeal on Page No. 9-10 as Annex-A,A-I)**, together with his other colleagues mentioned below the name of PASI Sadat Khan No. 25/K and above PASI Shafiq-ur-Rehman No. 17/K whom seniority the appellant has claimed in the main appeal. Later, the respondent department selected the appellant to the Upper College Course, course mandatory for inspector promotion, on the basis of his above credentials as also enunciated in the PTC Hangu Manual Rule No. 10 (iv) (Attached as **Annexure-I**) which mentions that

selection to the Upper college course shall be from amongst confirmed ASIs brought on List 'E'. Similarly, according to Police Rules 13.18(Attached as **Annexure-II**), on completion of 03-years period of probation, the respondent department shall confirm a probationer from the date of appointment. According to the respondent department reply, the appellant was put to practical courses i.e. A, B, C, D courses (covered over period of 02-years) after the 01-year basic training in PTC Hangu ended on 25.07.2007, thus put together, the

appellant had successfully completed his 03-years probationary period mandatory for confirmation before being selected by the department for Upper Course in Oct, 2009. The order of appellant's discharge from service was set aside by the worthy Provincial Police Officer, Khyber Pakhtunkhwa vide order No. 10905/Legal dated 30.05.2012 (Attached as **Annexure-III**) as the same was passed without fulfillment of codal formalities.

2. After reinstatement in service, the respondent department, by highlighting the appellant's break in service, miserably lingered the appellant's case and in time of approach for grant of revised seniority by the appellant, in turn, deficiency of his D-course was inappropriately highlighted though the appellant had successfully completed probationary period and the appellant's A, B, C & D courses proformas had been submitted by DPO Karak vide above letters mentioned in the above para-1 (**available on page 9-10 of the main appeal**). Similarly, though the appellant, after repetitive completion of said course 'D', was confirmed by the respondent department from the date of appointment i.e. 21.10.2006, however, his seniority was not dealt accordingly despite clear directives of high-ups regarding admission to List 'E' conveyed vide worthy Assistant Inspector General of Police, Establishment, Khyber Pakhtunkhwa, letter No. 14269-75/E-II dated **19.06.2013** and endorsed by the Regional Police Officer, Kohat vide office Endst: No.4789-91/EC dated **26.06.2013 (available on page No. 31 of Appeal)**, which highlighted that "seniority of upper subordinates in the rank of ASI be reckoned from the date of confirmation". Due to the above mentioned denial, the appellant was promoted to the next rank of Sub Inspector after lapse of nearly 10 years of appointment and thus, suffered subsequent huge loss.
3. The appellant's seniority has been consistently denied for reason of break in service despite fact that the appellant in the de novo proceedings after reinstatement has been awarded a minor punishment in the shape of stoppage of 01 annual increment with accumulative effect in addition to the absence period being treated as leave without pay and clear guidance had been conveyed from the high ups vide letter No. CPO/CPB/301 dated 30.07.2021 (**available on page No. 22 of Appeal**), that leave without pay does not amount to break in service (**attached on page No. 22-23 of Appeal**). Due to consistent denial from his due seniority, the appellant's overall professional career has been impacted a lot

least that the appellant has been included in List 'F' so belatedly to lie on Serial No. 1235(**Attached as annexure-IV**) awaiting promotion to the next rank of Inspector in a queue of hundred officers while his batch-mates vide Central Police Officer Peshawar Notification No.1355/SE-1 Dated 28/06-2022 have been recently promoted as Deputy Superintendents of Police read with Mr. Sadat Khan on Serial No.235 in the list of DSP after whom the applicant claims his seniority in the original appeal before honorable Court (**List of DSsP attached as annexure-V**).

- 4. Incorrect, reason of break in service was cited vide the impugned order No. 5002-03/ EC dated 14.04.2021 (**available on page No. 15-17 of Appeal**), passed by the Respondent No. 2 against which the appellant preferred departmental appeal before the Respondent No. 1 who issued clear guidance for compliance aforementioned in the preceding para that "minor punishment may not affect seniority and leave without pay does not amount to break in service. However, in clear violation of said too when the longstanding query of the office of the Respondent No. 2 regarding break in service was resolved, latter passed the impugned order in a biased and unjust manner.
- 5. Incorrect, as already explained vide the above para, the appellant had filed departmental appeal before the Respondent No. 1 against the impugned order dated 14.04.2021 of the Respondent No. 2 which, contrary to law, was altogether rejected/disposed off by the Respondent No. 2 vide the impugned order dated 16.11.2021 despite the fact that proper guidance for compliance was also conveyed to the Respondent No.2 by the Respondent No.1.
- 6. Incorrect. The appellant's seniority has never been fixed before the appellant approached this honorable court.

Reply to the Grounds: -

- A. That the appellant has been confirmed in the rank of ASI from the date of appointment however, in the spirit of Police Rules 14.1 (**available on page-25 as Annexure G of the main appeal**), his seniority has not been dealt accordingly. Instead, the guidance received vide letter mentioned in above paras in representation filed to the Respondent No.1 has been treated by the responded No.2 in a very biased and unjustified manner by altogether rejecting the representation preferred before the Respondent No. 1. Similarly, no chance of hearing has been provided to the appellant by the Respondent No.2 in passing the impugned order. Similarly, instructions for admission to List 'E' and Police Rules 12.2(3) conveyed from the high ups vide letter mentioned above (available on page 31 of appeal) has never been followed in letter and spirit in dealing with the seniority of the appellant.
- B. That the appellant's absence period has been treated as leave without pay in addition to a minor punishment. Therefore, the appellant cannot be vexed with two punishments at the same time.


- C. Already explained vide above paras that the appellant had fulfilled all the practical courses as submitted by the District Police Officer, Karak to the Regional Police Officer vide letter available on page No. 9-10 of main appeal. Similarly, the appellant's absence was not willful rather he had applied through proper channel to the high ups for grant of extraordinary leave in connection with getting higher education. The District Police Officer, Karak had recommended the appellant's leave request to the Respondent No. 2 vide letters attached ~~of Page No. J. & K.~~ of main appeal and thus, appellant was duly optimistic about his leave.
- D. Already explained vide above Para. Furthermore, the appellant's seniority has not been maintained in the light of clear instructions which stated by giving reference of the Police Rules 12.2(3) that "seniority in the rank of ASI shall be reckoned from the date of confirmation in that rank". The said had been endorsed by the Respondent No. 2 (letter available on page 31 of main appeal) however, the same and Police Rules 14.1 which states that "seniority of officers appointed or promoted on probation shall be finally determined by the date of confirmation in that rank", had not been followed in letter and spirit. The appellant is a confirmed ASI of 21.10.2006, however, his seniority has not been adjusted accordingly.
- E. As already explained in the above para C, the District Police Officer, Karak had recommended the leave request of the appellant to the senior officer. So, the appellant was very optimistic about his leave process for higher education as it was also his due right. The senior officers rejected the appellant's request for leave in connection with getting higher education in Quaid-i-azam, university, Islamabad.
- F. Already explained in the above para. The discharge order was set aside by the Provincial Police Officer as codal formalities were not followed. The appellant cannot be vexed twice in the shape of two punishments in the de-novo proceedings.
- G. Incorrect, till date the appellant's seniority has never been fixed. Similarly, the guidance received from CPO has been not complied in true spirit rather the impugned order has been passed in very biased manner.
- H. The CPO instructions have been totally flouted in passing the impugned order.
- I. Incorrect, the appellant has been denied of his due seniority.
- J. The Respondent No. 2 disposed of the representation filed before the Respondent No. 1 by passing the impugned order only on the basis of partial committee report and never even gave an opportunity of hearing to the appellant. The longstanding query of the Respondent No. 2 due to which the appellant was consistently denied of his due seniority was resolved after CPO guidance of Respondent No. 1 (available on page No. 22-23 of the main appeal) was conveyed for compliance to the Respondent No.2

however, latter again passed the impugned order in violation of merit and justice.

- K. The appellant's seniority has not been dealt according to rules.
- L. Already explained vide above para.
- M. Already explained vide above para.
- N. The appellant has not been heard by the Respondent No. 2 before passing the impugned order Already explained vide above para L.
- O. Incorrect, already explained vide above paras.
- P. Incorrect, already explained vide above paras.
- Q. That the unjust treatment of the Respondent No. 2 has resulted in the subsequent delay of future promotion of the appellant.
- R. Incorrect, the appellant's leave without pay does not amount to break in service as conveyed in the CPO guidance.

If is therefore, most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may please be accepted as prayed for with all back benefits.

Petitioner

Through

 Shahid Qayum Khattak
 Advocate,
 Supreme Court of Pakistan

Affidavit

I, do hereby solemnly affirm and declare on Oath that the contents of the above Rejoinder are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon'ble Tribunal.


 Deponent

Petitioner

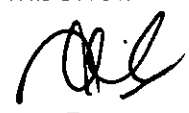
Through



Shahid Qayum Khattak
Advocate,
Supreme Court of Pakistan

Affidavit

I, do hereby solemnly affirm and declare on Oath that the contents of the above Rejoinder are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon'ble Tribunal.



Deponent

ATTESTED

Gul Daraz Khan

Oath Commissioner

Advocate High Court Faisalabad

01/12/2022

ATTESTED

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320				
321				
322				



The trainees of this class will complete six months training in the approved course. Main emphasis will be laid on making them good investigating officers. It is essential to inculcate in the trainees the qualities of dedication, self-confidence and ability to command.]

Rule 10(v) UPPER COLLEGE COURSE.

*[Total intake of the upper college course will be fixed, from time to time, by the Provincial Police officer.

Eligibility for admission:

a. He shall be confirmed as Assistant Sub Inspector and on promotion list "E".

b. He shall not be more than 48 years of age.

c. He should be mentally and physically fit.

Every trainee of this course shall fire 300 rounds of 7.62 bore and 50 rounds of 9MM bore. Detail is as under:]

i. * [Rounds of 7.62 bore:

a. For Practice Firing = 280 rounds

b. For Final examination = 20 rounds.

ii. Rounds of 9MM bore:

a. For Practice Firing = 40 rounds

b. For Final Examination = 10 rounds

The trainees of this course shall complete the specified period of training, as mentioned in rule 4 (vi) in law and drill subjects. Main emphasis shall be laid on making them good preventive and investigating officers. It is essential to inculcate in the trainees the qualities of self-confidence, commitment and ability to command.]

v. SUB-INSPECTOR LEGAL COURSE

The total intake will be fixed by the Provincial Police Officer.

The trainees of this course shall be examined in the approved syllabus drafted by the board of examiners constituted by the Commandant.

Every trainee of this course shall fire 50 rounds of 9MM bore. The detail is as under:

a. For Practice Firing = 40 rounds

b. For Final Examination = 10 rounds]

[Signature]
ATTESTED

character and abilities, including detective powers and ability to conduct prosecutions. The reports shall contain an opinion on any point specially required at any particular time, e.g., fitness to pass an efficiency bar. Particular mention shall be made of the officer's relations with his fellow officers and general public and his honesty.

Annex-II

7

¹[13.18 Probation :- (1) A person appointed to any post in the service shall remain on probation for a period of two years, if recruited by direct appointment and one year if appointed otherwise :

Provided that, -

- (a) any period, after such appointment, spent on deputation on a corresponding or a higher post shall count towards the period of probation ;
- (b) in the case of an appointment by transfer, any period of work on a equivalent or higher rank, prior to appointment to the Service, may in the discretion of the appointing authority, be allowed to count towards the period of probation ;
- (c) any period of officiating appointment to the service shall be reckoned as period spent on probation ; and
- (d) any kind of leave not exceeding six months during or at the end of period of probation, shall be counted towards the period of probation.

(2) If, in the opinion of the appointing authority, the work or conduct of a person during the period of probation is not satisfactory or if he has failed to pass the departmental ex-

amination, if any prescribed in service Rules within a period not exceeding two and a half year, from the date of appointment, it may :-

- (a) If such person is recruited by direct appointment, dispense with his services, or revert him, to a post on which he held lien prior to his appointment to the service by direct appointment ; and
- (a) If such person is appointed otherwise ,-
 - (i) revert him to his former post ; or
 - (ii) deal with him in such other manner as the terms and conditions of the previous appointment permit.

(3) On the completion of the period of probation of a person, the appointing authority may, -

- (a) If his work and conduct has, in its opinion been satisfactory, -
 - (i) confirm such person, from the date of his appointment or from the date he completes his period of probation satisfactorily if he is not already confirmed ; or
 - (ii) declare that he has completed his probation satisfactorily, if he is already confirmed ; or
- (b) If his work or conduct has not been, in its opinion, satisfactory, or if he has failed to pass the departmental examination, if any specified in the Service Rules, -
 - (i) dispense with his service, if appointed by direct appointment or if appointed otherwise revert him to his former post, or deal with him in such other manner as the terms and conditions of his previous appointment may permit; or
 - (ii) extend his period of probation and thereafter pass such order as it could have passed on the expiry of the period of probation as specified in sub-rule (1) ;

Provided that the total period of probation including extension, if any, shall not exceed three years.]

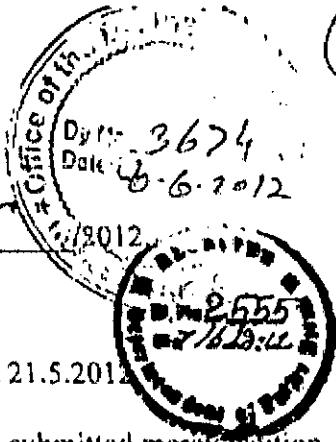
13.19. Special promotion to recipients of the President's Police and Fire Services


ATTESTED

From: - The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

To: - The Deputy Inspector General of Police,
Kohat Region, Kohat.

No. 10905 Legal, Dated Peshawar the: 30/5/12



Subject:- REPRESENTATION.

Memo:- Please refer to your letter No. 4577/EC dated 21.5.2012

Ex-PASI Tariq Usman of District Karak has submitted mercy petition for re-instatement in service to W/PPO against the order of DPO Karak dated 9.4.2010, vide which he was discharged from duty on the grounds of absence himself from training.

On perusal of his service record/enquiry file, it revealed that the enquiry conducted against him was not in accordance with provision of rules as the petitioner had not associated in the inquiry proceedings. He was not given a chance of personal hearing, publication of advertisement in daily papers to direct the official to report at his place of duty but no such codal formalities has been completed and ex-parte action was taken against the official. Hence his application is accepted by the competent authority with the direction to re-instate him in service and a de-novo proceeding be initiated against him under intimation to this office for further necessary action.

MOHAMMAD FAYAZ KHAN)
AIG/LEGAL
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

No. 5158 / EC
Date 6.6.12
Copy to

OB/SRC/PO.
DSP HRS. Karak
To conduct "de novo"
enquiry

necessary action and
proceed. against him as
a de-novo proceeding
present intimated.

OB NO 589
7/6/12
dl

District Police Officer
Karak
30/6/12

[Signature]
ATTESTED

[Signature]
DIG, POLICE
KOHAT:
31/5/12

SENIORITY LIST OF INSPECTORS & SUB INSPECTORS ON LIST "F" OF KHYBER PAKHTUNKHWA, POLICE ASI AS STOOD ON 20.07.2020.

_____/E-II, The seniority list of Inspectors and Sub Inspectors on List "F" of Khyber Pakhtunkhwa Police as it stood on 20.07.2020 is hereby published for
attention to all concerned:-

NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMN: TO LIST "F"	D.O PROMOTION AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	REMARKS
Azmat Ali No. K/200	Kohat	BA	01.04.1978	25.02.1998	02.07.2012	05.11.2014	05.11.2014	05.11.2016	Assigned seniority vide notification No.475/E-II, Dated 11.12.2020.
Muhammad Iqbal No.K/10	Peshawar	BA	02.02.1964	02.05.1985	15.08.2012	30.01.2013	30.01.2013	19.10.2015	
Muhammad Sohail No. H/07	Mansehra	BA	30.04.1977	18.01.2001	31.08.2012	31.10.2013	31.10.2013	31.10.2015	Assigned seniority vide order No.36/E-II, Dated 27.01.2020.
Muhammad Amin No. H/42	Abbottabad	10th	06.09.1962	15.11.1981	31.08.2012	30.01.2013	30.01.2013	19.10.2015	
Habib Ullah Khan No. M/168	Dir Lower	FA	14.04.1973	19.08.1991	12.09.2012	30.01.2013	30.01.2013	19.10.2015	
Abdullah Jan No. P/182	Peshawar	FA	24.10.1963	24.03.1984	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Nasrullah Khan No.P/185	Peshawar	FA	20.04.1968	24.09.1987	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Muhammad Kamran No. P/188	Malakand	MA	12.02.1981	12.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Sajid Mumtaz No. P/189	Charsadda	BA	27.12.1979	21.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Fida Hussain No.P/190	Peshawar	MA.BSc	21.01.1983	21.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Ijaz Ali No. P/191	Charsadda	MBA	10.04.1983	22.10.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Zakaullah No. P/192	Nowshera	BA	01.10.1965	13.12.1988	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Taj Muhammad Khan No. P/193	Nowshera	MA	13.02.1979	28.12.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Ijaz Ali No. P/194	Charsadda	MA	14.05.1978	28.02.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Adnan Azam No. P/195	Charsadda	FA	16.06.1984	28.02.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Zahid Alam No.P/196	Peshawar	FSC	15.07.1987	28.02.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Rehmatullah No. P/197	Peshawar	FSc	07.03.1986	28.02.2006	13.09.2012	30.01.2013	30.01.2013	19.10.2015	
Muhammad Inam Jan	Mardan	MA	15.03.1979	12.10.2006	19.09.2012	30.01.2013	30.01.2013	19.10.2015	

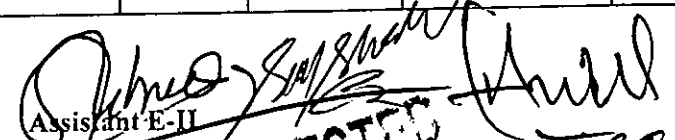
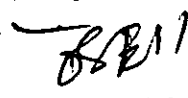
ATTESTED

Assistant E-II

OS/E-II
Edit with WPS Office

Registrar

	SI Khalid Khan No.P/458	Mardan	F.A	15.04.1971	03.08.1991	20.10.2020	22.02.2021	-	-	-
1232.	SI Ihsan-Ul-Haq No.P/459	Nowshera	F.A	08.01.1973	12.08.1991	20.10.2020	22.02.2021	-	-	-
1233.	SI Hashmat Khan No.P/460/1265/P	Peshawar	F.A	27.01.1973	13.07.1991	20.10.2020	22.02.2021	-	-	-
1234.	SI Wajid Ali No.P/461	Nowshera	10 th	03.11.1968	28.12.1987	20.10.2020	22.02.2021	-	-	-
1235.	SI Muhammad Tariq Usman No.K/44	Karak	M.A	03.03.1986	20.03.2011	21.10.2020	22.02.2021	-	-	-
1236.	SI Jamshaid Ali No.K/14	Hangu	M.A	12.06.1980	20.02.2010	21.10.2020	22.02.2021	-	-	-
1237.	SI Shakeel Ahmad No.K/183	Karak	B.A	02.02.1965	11.12.2011	21.10.2020	22.02.2021	-	-	-
1238.	SI Shafi Muhammad No.K/190	Karak	F.A	07.05.1963	01.01.1985	21.10.2020	22.02.2021	-	-	-
1239.	SI Tariq Mehmood No.K/121	Karak	F.A	02.02.1979	27.12.2010	21.10.2020	22.02.2021	-	-	-
1240.	Sajjad Haider No.K/218	Kohat	F.A	05.07.1969	23.09.1987	21.10.2020	22.02.2021	-	-	-
1241.	Muhammad Akbar No.K/222	Kohat	B.A	02.12.1972	25.08.1991	21.10.2020	22.02.2021	-	-	-
1242.	SI Khalil Usman No.K/232	Kohat	M.A	09.01.1970	06.07.2007	21.10.2020	22.02.2021	-	-	-
1243.	SI Qabal Khan No.K/239	Kohat	B.A	01.03.1970	05.07.1988	21.10.2020	22.02.2021	-	-	-
1244.	SI Ayaz Hussain No.K/246	Hangu	M.A	11.02.1971	06.07.1991	21.10.2020	22.02.2021	-	-	-
1245.	SI Darwish Hassan No. MR/108	Mardan	M.A	08.02.1980	07.02.2002 absorbed as PASI on 25.02.2010	28.12.2020	24.08.2021	-	-	-
1246.	SI Zia Ullah No. MR/23	Swabi	F.A	28.02.1991	27.07.2010 (PASI)	28.12.2020	24.08.2021	-	-	-
1247.	SI Muhammad Hussain Qadir No. MR/105	Mardan	BSC	10.03.1991	26.07.2010 (PASI)	28.12.2020	24.08.2021	-	-	-
1248.	SI Taimoor Saleem MR/137	Mardan	B.A	16.02.1985	26.03.2011 (PASI)	28.12.2020	24.08.2021	-	-	-
1249.	SI Kifayat Ullah No. MR/291	Mardan	10 th	05.02.1968	26.02.1992	28.12.2020	24.08.2021	-	-	-
1250.	SI Sahib Zar No. MR/340	Mardan	10 th	15.01.1967	17.10.1985	28.12.2020	24.08.2021	-	-	-


 Assistant E-II
ATTESTED

 Registrar



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

REVISED SENIORITY LIST OF DSsP BS-17 OF KHYBER PAKHTUNKHWA POLICE

Dated: 28 / 06 / 2022

No. JBSS /SE-I, The Revised Seniority List of DSsP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
1.	Mr. Qaid Kamal	01.01.1963	Charsadda	01.01.1994	01.01.1996	07.11.2012
2.	Mr. Muhammad Aleem Jan	11.04.1967	Peshawar	30.01.1998	30.01.1998	24.01.2014
3.	Mr. Aamir Shahzad	09.08.1968	Peshawar	30.01.1998	30.01.1998	30.06.2011
4.	Mr. Muhammad Arif	10.03.1969	Peshawar	30.01.1998	30.01.1998	19.03.2012
5.	Mr. Waqar Ahmad	03.01.1968	Nowshera	01.04.1997	01.04.1999	19.03.2012
6.	Mr. Muhammad Shafiq	13.01.1963	Bannu	01.10.1997	01.10.1999	19.03.2012
7.	Mr. Muhammad Arif	22.04.1964	Bannu	01.10.1997	01.10.1999	07.11.2012
8.	Mr. Gul Naseeb	09.11.1968	Bannu	01.10.1997	01.10.1999	19.03.2012
9.	Mr. Sanaullah	10.01.1969	Lakki	01.10.1997	01.10.1999	31.03.2012
10.	Mr. Amir Muhammad Khan	07.01.1970	Buner	14.10.1997	14.10.1999	19.03.2012
11.	Mr. Ali Hassan	06.03.1965	K.Agency	28.01.1998	28.01.2000	24.08.2020
12.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	20.02.1998	20.02.2000	30.06.2011
13.	Mr. Munir Hussain	30.05.1966	Mansehra	15.04.1998	15.04.2000	07.11.2012
14.	Mr. Tahir ur Rahman	28.02.1969	Haripur	20.06.1998	20.06.2000	19.03.2012
15.	Mr. Muhammad Suleman	28.07.1970	Mansehra	20.06.1998	20.06.2000	30.06.2011
16.	Mr. Janas Khan	10.02.1965	Abbottabad	20.06.1998	20.06.2000	20.01.2011
17.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	26.05.1987	20.06.2000	25.03.2013
18.	Mr. Asad Mehmood	08.03.1968	Swabi		07.09.2000	24.10.2014
19.	Mr. Asif Gohar	07.08.1964	Mansehra	26.04.2000	26.04.2002	20.01.2011
20.	Mr. Tahir Iqbal	20.01.1969	Haripur	26.04.2000	26.04.2002	25.03.2013

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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
234.	Mr. Azmat Ali	01.04.1978	Kohat	11.07.2010	11.07.2012	18.02.2022
235.	Mr. Sadat Khan	06.04.1983	Kohat	24.08.2010	24.08.2012	18.02.2022
236.	Mr. Fazal Hanif	01.01.1974	Karak	24.08.2010	24.08.2012	18.02.2022
237.	Mr. Nazar Hussain	10.01.1975	Hangu	24.08.2010	24.10.2012	18.02.2022
238.	Mr. Muhammad Yousaf	10.04.1975	Karak	24.08.2010	24.08.2012	18.02.2022
239.	Mr. Nazir Khan	02.04.1977	Kohat	24.08.2010	24.08.2012	18.02.2022
240.	Mr. Abid Khan	01.03.1979	Kohat	24.08.2010	24.08.2012	18.02.2022
241.	Mr. Umar Hayat	01.02.1984	Karak	24.08.2010	24.08.2012	18.02.2022

NOTE:- Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within 15 Days after the issuance of this list, otherwise no representation will be entertained after the specific period.

(DR. ZAHID ULLAH) PSP

AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Endst: No. & date even.

Copy to all concerned

[Signature]
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