

02.07.2015

Appellants with counsel present. Learned counsel for the appellants argued that since the appellants have submitted separate appeals No. 725 and 727 of 2015 which have been admitted to regular hearing and in which the judgment of the august Peshawar High Court dated 26.2.2015 is also annexed for consideration as such the appellants be allowed to withdraw the instant appeal.

In view of the fact that pursuant to the judgment of the august Peshawar High Court, Peshawar dated 26.2.2015 passed in Writ Petition No. 919/2014, the appellants have preferred separate fresh appeals No. 725/2015 and 727/2015 in proper format as such the instant appeal is allowed to be dismissed as withdrawn. File be consigned to the record.

ANNOUNCED
2.7.2015


Chairman
02.07.15

4. 29.05.2015

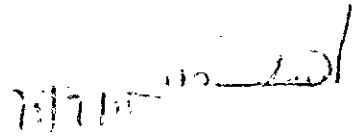
Junior to counsel for the appellants/petitioners present. Senior counsel for the appellants/petitioners is not in attendance. Requested for adjournment. Adjourned to 12.06.2015 for preliminary hearing before S.B.

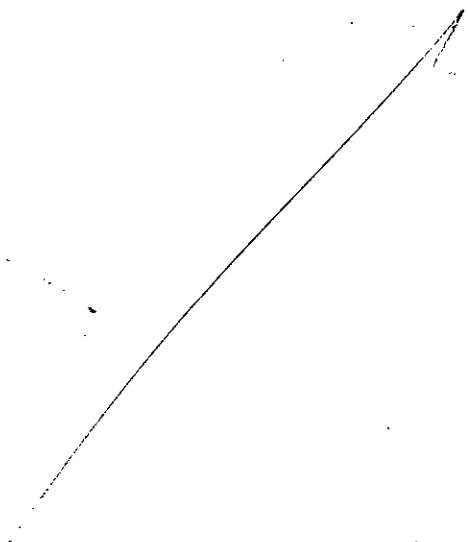

Chairman

5 12.06.2015

Appellant with counsel present. Learned counsel for the appellant requested for adjournment and permission to submit appeal in proper format as the appeal in hand has been sent by the Hon'ble Peshawar High Court, Peshawar vide order dated 26.2.2015. He may do so where-after the appeal be relisted for preliminary hearing for 2.7.2015 before S.B.


Chairman

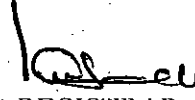






Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 423 /2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	11/05/2015	<p>The present appellants initially went in Writ Petition before the Hon'ble Peshawar High Court and the Hon'ble High Court vide its order dated 26.02.2015 treated the Writ Petition into an appeal and sent the same to this Tribunal for decision in accordance with law. The same may be entered in the Institution Register and put up to the worthy Chairman for further order please.</p> <p style="text-align: right;"> REGISTRAR <u>11/5/15</u></p>
2	<u>13-5-15</u>	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>15-5-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	15.05.2015	<p>None present for appellants/petitioners. Notice to counsel for the appellants/petitioners be issued for preliminary hearing for 29.5.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>

A.W.F. Province
Service Tribunal

Diary No. 383

Dated 11-5-15



**THE
PESHAWAR HIGH COURT
PESHAWAR**

Ph: No. 091-9210149-158
Ext: No. 394

No. 654 /Judl:

Dated Peshawar the 9-9-15 2015

From

The Additional Registrar (J),
Peshawar High Court,
Peshawar.

To

The Registrar,
KPK Service Tribunal,
Peshawar.

Subject Writ Petition No. 919-P/2014.

Head Constable Qasim Mehmood & one other -----Petitioners

Versus

Provincial Police Officer, Govt. of KPK & others -----Respondents

Memo:

I am directed to send herewith the titled case in original alongwith all annexures & copy of order dated 26-02-2015, passed by Division Bench of this Court, for compliance.

ADDITIONAL REGISTRAR (J)
9/5/15

Encl:

As above.

64

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET

S.No.	Date of order	Order or other proceedings with signature of the Judge
1	2	3
	26.2.2015	<p><u>W.P.No.919/2014.</u></p> <p>Present: Mr.Muhammad Arif Jan, Advocate for the petitioner.</p> <p>Syed Sikandar Hayat, AAG for the respondents. _____</p> <p><u>YAHYA AFRIDI,J.-</u> Qasim and Noor Shehzad, Head Constables, seek the constitutional jurisdiction of this Court, praying that:-</p> <p><i>“For the aforesaid reasons, it is therefore, humbly prayed that on acceptance of this writ petition, this Hon’ble Court may graciously be pleased to direct the respondents to abide by the law and extend the benefits of Standing Order 6/2008 in favour of the petitioners and set aside the impugned order dated 13.8.2013 and also re-instate the petitioners on their position as HCs/ASIs.”</i></p> <p>2. The issue squarely falls within the terms and conditions of service of the petitioner, for which this Court lacks the jurisdiction to entertain the same. However, this petition was filed when the Worthy Khyber Pukhtunkhwa Service Tribunal was not functioning, hence, the same was admitted for hearing.</p> <p>3. Today, the Worthy counsel for the petitioners</p>

a2

states that the Khyber Pukhtunkhwa Service Tribunal has been validly constituted, hence this matter be referred to the appropriate forum.

4. Accordingly, this petition is sent to the Worthy Khyber Pukhtunkhwa Service Tribunal, for proper adjudication.

5. The Worthy AAG, representing the respondents, raised an objection regarding the limitation, which shall be adjudged by the Worthy Khyber Pukhtunkhwa Service Tribunal.

This petition is disposed of accordingly.


JUDGE


JUDGE

M.Gul

IN THE PESHAWAR HIGH COURT, PESHAWAR

Appeal No. 423/2015

Writ Petition No. 918-P/2014

6

Head Constable Qasim Mehmood
No.656, Kohat Region and one
another.....Appellant

Versus

The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
and othersRespondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of writ petition alongwith request for interim relief			1-9
2.	Copies of commendations certificates and details	09-11-2011	A	10-33
3.	Copy of FIR No.69 dated 19-07-2008 and other details		B	34-40
4.	Copy of "Chief Minister's Medal for Valour"	10-11-2011	C	41-45
5.	Copy of Standing Order No.6/2008		D	46-47
6.	Recommendations for accelerated promotion	08-12-2011	E	48-51
7.	Copy of Promotion	15-12-2011	F	52-58
8.	Copy of others documents		G	59
9.	Copy of representation before respondent No.1	27-12-2011	H	60-65
10.	Copy of departmental appeal before respondent No.2		I	66-74
11.	Court Fee Rs.500/-	15-02-2012		75
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FILED TODAY

Deputy Registrar

19 MAR 2014

Dated: / 03/ 2014

Through

RE-FILED TODAY

Deputy Registrar

22 MAR 2014

Appellant

Ashraf Ali
Ashraf Ali Khattak

And

Nawaz Khan
Nawaz Khan Khattak
Advocates, Peshawar

IN THE PESHAWAR HIGH COURT PESHAWAR

Appeal No. 423/2015

WRIT PETITION No. 919-P/2014

1. Head Constable Qasim Mehmood No.656, Kohat Region.
2. Head Constable Noor Shehzad No.440, Kohat Region
.....Petitioner.

Versus

1. The Provincial Police Officer, Govt: of KPK, Peshawar.
2. The Regional Police Officer, (DIG) Kohat Region Kohat.
3. The District Police Officer, Kohat.
4. The District Police Officer, Hangu.
5. The District Police Officer, Kohat..... Respondents.

**WRIT PETITION UNDER ARTICLE, 199 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC OF
PAKISTAN, 1973.**

Respectfully Sheweth,

Facts giving rise to the present writ petition are as under:-

1. That petitioner was enlisted in Police Force as Foot Constable and after passing professional Courses, they was promoted as Head Constable.
2. That petitioners performed their duties very efficiently and to the entire satisfaction of their superiors and therefore in view of his good performance and hard working they were always deployed to high risky tasks.

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Deputy Registrar

19 MAR 2014

3. That petitioners established their outstanding performance, bravery beyond the call of their duties and therefore made in every special campaign against terrorists, Pos, gamblers, kidnappers and anti social elements including the person involved in the business of illicit arms ammunition, narcotics etc and was therefore, awarded with special commendations certificate and prizes (The details has been annexed as Annexure-A).
4. That during the course of his posting, he on numerous occasion put his life at stake for targeting the criminals. One PO namely Asghar Khan S/o Gul Shahid Khan r/o Ghool Banda Police Station Khurram (Karak) was a notorious proclaimed offender and hardened criminal who was a source of unrest, turmoil and symbol of terror in the entire area. On 19th July, 2008 an information about the presence of the said diehard proclaimed offender in the hillock area of village Eidar Banda Police Station Khurram was received to Police. Petitioner along with one Gul Bahader as incharge Rescue 15 rushed to the spot; volunteered to put their lives at stake for targeting the criminal. The criminal was resultantly killed. Proper case vide FIR No.69 dated 19-07-2008 was registered (Annexure-B).
5. That on account of outstanding bravery and exhibiting courage, exceptional performance, gallantry and devotion, beyond the call of duty, petitioner No.1 and Gul Bahadar No.135 were selected for "Chief Minister's Medal for Valour". The Medal was awarded to the petitioner and Gul Bahadar on 14-03-2009 (Annexure-C).

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Deputy Registrar

19 MAR 2014

6. That it is pertinent to mention here that the respondent No.1 in the light of power vested in him under section 10(3) of Police Order, 2002 has issued Standing Order No.6 of 2008 (Annexure-D), wherein in order to encourage officers of junior ranks, who demonstrate exceptional performance, gallantry and devotion, beyond the call of duty has been held entitled for out of turn promotion to the next higher rank up to the inspector.
7. That the Standing Order further provide that such promotion shall be treated as ad-hoc and will be regularized when the officers so promoted have successfully qualified the training course prescribe, if any. The respondent No.1 may select such officers out of turn for such a prescribed course.
8. That vide Memorandum dated 19-05-2009 (Annexure-E), respondent No.2 recommended petitioners for accelerated promotion to the rank of H.C/ASI within the meaning of Standing Order No.6/2008. They were promoted the rank of H.C/ASI vide Order dated 22-06-2009 (Annexure-F) and serving as ASI.
9. That it is pertinent to mention here that One Mr. Jahangir Khan, Mr. Ali Hassan, Amran Gul (Shaheed) of Kohat and Gul Jamal of Hangu were promoted to the rank of Inspectors, whereas Shah Duran and Abdullah of Kohat and Mr. Gulzar Khan of Hangu were promoted to the rank of Sub Inspectors and whereas Mr. Qasmat Khan and Hakeem Shah of Karak District were promoted to the rank of ASI.
10. That in the similar way petitioner along with Constable Sar Muhammad No.539, Nek Muhammad No.253, Noor Shehzad

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Deputy Registrar

19 MAR 2014

No.440 and Afsar Ali Khn No.6 of Karak District were also promoted to the rank of HC/ASI on the same pedestal

~~XXXXXXXXXX~~ (Annex-G)
 11. That Vide Order No.10425/EC, dated 13-08-2013, petitioners along with Constable Sar Muhammad No.539, Nek Muhammad No.253 and Afsar Ali Khn No.6 have been demoted to their substantive rank, whereas Mr. Jahangir Khan and Gul Jamal Inspectors and Shah Duran and Abdullah, Mr. Gulzar Khan Sub Inspectors, Mr. Qasmat Khan and Hakeem Shah HC/ASI, who were also promoted on the strength of Standing Order No.6/2008 have not been demoted and disturbed.

12. That petitioner, being aggrieved of the acts and actions of Respondents and by the impugned order of demotion coupled with discriminatory treatment preferred departmental representation through proper channel before the respondent No.1 (Annexure-H), but the same were returned back with direction to address the same in the name of respondent No.2, which direction were duly complied by the petitioners and again submitted their representation before the Honourable respondent No.2, but the same are still pending without disposal (Annexure-I).

13. That since the element of discrimination and not treating the petitionerS at par with their colleagues, whose cases are similar and identical to that of the petitioners is involved in the case, which is constitutional right and can be resolved only the Constitutional petition and therefore, having no other adequate and efficacious remedy, assails the impugned orders through the instant constitutional petition inter-alia on the following grounds:-

FILED TODAY
 Deputy Registrar
 19 MAR 2014

Grounds:

- A. That Respondents have not treated petitioner in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973. Standing Order No.6 of 2008 provides that in order to encourage officers of junior ranks, who demonstrate exceptional performance, gallantry and devotion, beyond the call of duty has been held entitled for out of turn promotion to the next higher rank up to the inspector. Petitioner in numerous occasions have exhibited bravery and courage of the highest order despite the looming danger to their lives for the Honour of the Police Force and for the nation at large and has been awarded commendation certificates, prizes and also honoured with "Chief Minister's Medal for Valour", but when time came for the actual recognition of his exceptional performance, gallantry and devotion as per Standing Order 6/2008, they have not only deprived of the benefits of the Standing Order, but penalized by reverting them to their substantial position of Head Constable.
- B. That vide Memorandum dated 19-05-2009, respondent No.2 recommended Mr. Jahangir Khan, Mr. Ali Hassan, Amran Gul (Shaheed) of Kohat and Gul Jamal of Hangu were promoted to the rank of Inspectors, whereas Shah Duran and Abdullah of Kohat and Mr. Gulzar Khan of Hangu were promoted to the rank of Sub Inspectors and whereas Mr. Qasmat Khan and Hakeem Shah of Karak District were promoted to the rank of HC/ASI on the strength of Standing Order, but they have not been demoted to their substantive rank, but petitioners have been treated differently, they have not only been deprived of their accrued benefits of the

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Deputy Registrar
19 MAR 2014

Standing Order 6/2008 but rather penalized by reversion, which is not only against the provision of the Article 25 and 27 of the Constitution, but also against the principle of natural justice, fair play and equity.

- C. That all public powers are in the nature of a trust and public functionary must act as repository of such trust. In the instant case, petitioners were entitled for the benefits of the Standing order 6/2008, and the grant of the same was promised to him, but the authority took U-turn of their promise and not only deprived the petitioner from the benefits of the Standing Order, but also revert them to his substantial post, which is the violation of public Trust and against the principle of fair Justice.

For the aforesaid reasons, it is therefore, humbly prayed that on acceptance of this writ petition, this Hon'ble Court may graciously be pleased to direct the respondents to abide by the Law and extend the benefits of Standing Order 6/2008 in favour of the petitioners and set aside the impugned order dated 13-08-2013 and also re instate the petitioners on their position as HC/ASI.

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

Through

Petitioner

Ashraf
Ashraf Ali Khattak

And

Nawaz
Nawaz Khan Khattak
Advocates, Peshawar.

Dated: _____ / 03/ 2014

FILED TODAY

Deputy Registrar

19 MAR 2014

CERTIFICATE

Certified on instruction that petitioner has not previously moved this Hon'ble Court under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973 regarding present matter.

Ashraf Ali
Ashraf Ali Khattak

And

Nawaz Khan
Nawaz Khan Khattak
Advocates, Peshawar.

List of Books

1. The Constitution of the Islamic Republic of Pakistan, 1973.
2. Services Law.

Note

1. Three spare copies of the Writ Petition are enclosed in a separate file cover.
2. Memo of addresses is also attached.

Ashraf Ali
Ashraf Ali Khattak

And

Nawaz Khan
Nawaz Khan Khattak
Advocates, Peshawar.

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Deputy Registrar

19 MAR 2014

M

IN THE PESHAWAR HIGH COURT PESHAWAR.

WRIT PETITION No. 919-P2014

Head Constable Qasim Mehmood No.656, Kohat Region and one other.....Petitioners.

Versus

The Provincial Police Officer, Govt: of KPK, Peshawar and others.....Respondents.

Affidavit

I, Ashraf Ali Khattak Advocate on behalf of and as per instruction of my client, do hereby solemnly affirm and declare on oath that the contents of this writ petition are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Court.

Ashraf Ali
Deponent

No. 9337-.....

Certified that the above was verified on solemnly affirmation before me in office, this 18/3/2014

day of March 20014 by Ashraf Ali

to PCP r/o PCP

who was identified by Self

who is personally known to me:

18/3/2014

Oath Commissioner
Peshawar High Court, Peshawar.

ACP

FILED TODAY
Deputy Registrar
19 MAR 2014

IN THE PESHAWAR HIGH COURT PESHAWAR.

WRIT PETITION No. 919-P/2014Head Constable Qasim Mehmood No.656, Kohat Region and one
other.....Petitioners.

Versus

The Provincial Police Officer, Govt: of KPK, Peshawar and
others.....Respondents.Addresses of Parties.

1. Head Constable Qasim Mehmood No.656, Kohat Region.
2. Head Constable Noor Shehzad No.440, Kohat Region
.....Petitioner.

Versus

1. The Provincial Police Officer, Govt: of KPK, Peshawar.
2. The Regional Police Officer, (DIG) Kohat Region Kohat.
3. The District Police Officer, Kohat.
4. The District Police Officer, Hangu.
5. The District Police Officer, Kohat..... Respondents.

Through **Petitioner**
Ashraf Ali
Ashraf Ali Khattak

And *Nawaz Khan*
Nawaz Khan Khattak
Advocates, Peshawar.

Dated: _____ / 03/ 2014

FILED TODAY
Deputy Registrar
19 MAR 2014

Fax No. 9200114

From: The Dy. Inspector General of Police, Kohat Region, Kohat

To: The District Police Officer, Kalak

No. 8552 / EC, Dated Kohat the 4/10/2009

Subject:-

RECOMMENDATION FOR ACCELERATED / OUT OF TURN PROMOTION

Memorandum.

Please refer to your office Memo No.6385/EC dated 07.10.2009. In this connection your attention is invited to criteria issued by Police Chief NWFP Peshawar vide his Endst. No.8242-4327/C-I, dated 04.06.2008 mentioned below:-

To encourage officers who demonstrate exceptional performance, gallantry and devotion, beyond the call of duty, the Provincial Police Officer or Capital City Police Officer as the case may be, may on the recommendation of a Committee comprising of three officers not below the rank of Deputy Inspector General of Police including the Deputy Inspector General of Police of the Region concerned who will represent the case recommended by the Region/Capital City/ City Police, promote out of turn such officers of junior ranks to the next higher rank up to Inspector. The Committee shall ensure that only cases of exceptional performance, bravery and devotion are recommended and the ordinary/ routine cases are avoided. Such promotions shall be treated as ad-hoc and will be regularized when the officers so promoted have successfully qualified the training course prescribed, if any. Such promotees shall be placed at the bottom of promotion list drawn up for that year. The Provincial Police Officer may select such officers out of turn for such a prescribed course.

LSRE
Police Officer
Kalak
12/10/09

In view of above the incumbent may be promoted as desired by Police Chief, on adhoc basis.

However, the obstruction comes in his promotion i.e formalities / courses for promotion will be made by the incumbent Constable Qasim Mehmood No.656 after granting adhoc promotion as Head Constable to him he will not claim seniority over his senior till his on turn of promotion as Offg. Head Constable after going necessary courses.

(Signature)
(ABDULLAH KHAN) P.S.P
Dy. Inspector General of Police,
Kohat Region, Kohat.

T.C
(Signature)

ORDER:-

In pursuance of Deputy Inspector General of Police office Endst: No. 5682/EC, dated 30.06.2009 and memo: No. 8858/EC. Dated 09.10.2009 Constable Qasim Mehmood No. 656 is hereby promoted as Offg. Head Constable on adhoc basis. He will not claim seniority over his service till his own turn for promotion as Offg. after under going necessary courses.

O.B No. 1066

Dated 10/10/09

DL District Police Officer, Karak

OFFICE OF THE DISTRICT POLICE OFFICER KARAK.

No. 6918-22 /EC, Dated 12-10 /2009.

Copy of above is submitted to:-

1. The Deputy Inspector General of Police Kohat, Region Kohat w/r to this office Endst: No. 13461-68/EC, dated 09.10.2009 for favour of information, please.
2. The Departmental Promotion Committee Members.

DL District Police Officer, Karak

T.C
[Signature]



N.W.F.P POLICE

COMMENDATION CERTIFICATE-III

Granted by MR. NISAR AHMAD KHAN

District Police Office Nowshera.

12
18
ranted to HC QASIM MEHMUD NO. 656. Son of _____

resident of _____ Police Station KALAN. District NOWSHERA.

- recognition of FIR NO. 1243, date 17.11.09, u/s 9CNSA, PS KALAN. FIR NO. 1247/09, U/S P.O, PS KALAN.

.B. No. 1996.

CASH REWARD RS. 300/-

dated 19.11.09.

District Police Officer,
Nowshera

CONSTABLES

22. Marking sheet in connection with promotions to the selection grade of Constables

23. Health certificate



N.W.F.P POLICE

COMMENDATION CERTIFICATE-III

Granted by MR. NISAR AHMAD KHAN

District Police Office Nowshera.

Granted to H.C. QASIM MEHMOOD NO. 656 CMM Son of _____

Resident of _____ Police Station POLICE LINES District NOWSHERA

In - recognition of HIS EXCELLENT PERFORMANCE.

O.B. No. 1956

Dated 12.11.09.

Cash Reward Rs. 1000-00

District Police Officer,
Nowshera

22. Marking sheet in connection with promotions to the selection grade of Constables

23. Health certificate



CLASS II

This certificate is awarded to

Mr. Qasim Mehmood, HC/656 S/O

R/o Efficient performance in case FIR No. 175 dt: 17.2.10 w/s 324/353/13-20/5-Exp act
PS Akora Khattak.
with cash Reward Rs. 3000/-

In recognition of his valuable services



O.B. NO. _____

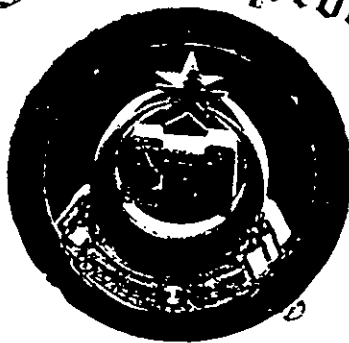
DATED _____

[Signature]
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

22. Marking sheet in connection with promotions to the selection grade of Constables

23. Health certificate

North West Frontier Province Police



15

Commendation Certificate

CLASS I

Granted by

MALIK NAVEED KHAN

INSPECTOR GENERAL OF POLICE N.W.F.P.

To HC QASIM MEHMOOD NO.656.

Son of _____

District NOWSHERA.

in Recognition of


SHOWED GOOD PERFORMANCE VIDE CASE FIR NO.1038 DATED

10.11.2009 U/S 5-GO, FIR No.1041 DATED 11.11.09 PS

NOWSHERA CANTT.

(CASH REWARD OF RS.1500/-).

Dated.....20


(MALIK NAVEED KHAN)
Inspector General of Police,
N.W.F.P.

T.C
2

22. Marking sheet in connection with promotions to the selection grade of Constables.

23. Health certificate

North West Frontier Province Police

(16)



Commendation Certificate

CLASS I

Granted by

MALIK NAVEED KHAN

INSPECTOR GENERAL OF POLICE N.W.F.P.

To PC RASIM MEHMOOD NO. 656.

Son of _____

District NOWSHERA.

in Recognition of

FOR HIS GOOD PERFORMANCE OF DUTY.

(CASH REWARD OF RS. 2000/-).

Dated.....20 '0

(MALIK NAVEED KHAN)
Inspector General of Police,
N.W.F.P.


- 22. Marking sheet in connection with promotions to the selection grade of Constables
- 23. Health certificate

DISTRICT BANNU		
1.	Mr. Abdul Ghafoor Khan	DSP HQs Lakki Marwat
2.	Mr. Nazif Shah	DSP Rural-II Bannu
3.	Mr. Gul Hamid Khan	SI SHO PS Miryan Bannu
4.	Mr. Ghulam Fayd Khan	Inspector SHO Cantt. Bannu
5.	Mr. Jamshid Ali Shah No. 782	HC PS Cantt. Bannu
6.	Mr. Nifattullah No. 814	HC Gunman DPO Bannu
7.	Mr. Shabirullah No. 1282	Constable PS Cantt. Bannu
8.	Mr. Javed Iqbal No. 1023	Constable PS Cantt. Bannu
9.	Mr. Sher Ayaz-ud-Din	Constable DPO Squad
10.	Mr. Wahibullah Khan No. 446	Constable DPO Squad
11.	Mr. Dilnawaz Khan No. 6589/FRP	HC PP Kalan
12.	Mr. Muhammad Sohail No. 6526/FRP	Constable PP Kalan
13.	Mr. Najeebullah No. 2391/FRP	Constable PP Kalan
14.	Mr. Abd-ur-Rehman No. 792/FRP	Constable PP Kalan
DISTRICT MARDAN		
1.	Syed Akhtar Ali Shah	DIG/Mardan
2.	Mr. Waqif Khan	DPO Charsadda
3.	Mr. Muhammad Rafiq Khan	DPO Swabi
4.	Mr. Muhammad Iqbal Khan	DPO Mardan
5.	Mr. Yameen Khan	DPO Nowshera
6.	Mr. Riaz Khan	SP/Investigation Charsadda
7.	Mr. Farid Hussain Bangash	DSP/Rural, Mardan (Martyred)
8.	Mr. Pir Shahab Ali Shah	DSP Shahqadar
9.	Mr. Fazal Hanan	Inspector (Martyred)
10.	Mr. Shah Montaz Khan	Inspector
11.	Mr. Saleem Dad Khan	Inspector
12.	Mr. Mazhar Shah	Inspector
13.	Mr. Amjad Khan	Sub-Inspector
14.	Mr. Sher Ullah Khan	Sub-Inspector (Martyred)
15.	Mr. Abid ur Rehman	Sub-Inspector
DISTRICT PESHAWAR		
1.	Mr. Bahdar Khan (Shaheed)	DSP Charsadda
2.	Mr. Shahnawaz Khan	DSP Charsadda
3.	Mr. Jhangir Khan (Shaheed)	Inspector Charsadda
4.	Mr. Muhammad Riaz	Sub-Inspector Peshawar
5.	Mr. Abd ur Rehman	Peshawar
6.	Mr. Muhammad Riaz	Head Constable Charsadda
7.	Mr. Hazrat Ali	FC Peshawar
8.	Mr. Hukam Khan	Inspector BDS Squad
MISCELLANEOUS		
1.	Mr. Afzal Khan (Shaheed)	Sub-Inspector
2.	Mr. Faqir Shah (Shaheed)	Sub-Inspector
3.	Mr. Ghafoor Khan No. 545 (Shaheed)	Constable
4.	Mr. Khan Bahadar No. 4483 (Shaheed)	Constable
5.	Mr. Saifullah	Driver Constable

Entries regarding above should be made in their Service Books/Foiji Missal accordingly with reference to the Standing Order No. 8/08 "Chief Minister Medals for Valour 2008"

(MALIK NAVEED KHAN)
 Provincial Police Officer,
 Khyber Pakhtunkhwa,
 Peshawar.
 Dir: SP-5
 16.7.2010

Copy for information and necessary action to the all concerned.

T.C




N.W.F.P POLICE

COMMENDATION CERTIFICATE-III

Granted by MR. NISAR AHMAD KHAN DPO/NO. 258/2016

District Police Office Nowshera.

Granted to HC YASIM MAHMUD NO. 656 G.M.K Son of KHALIL NAWAZ

Resident of TARKHA KOI Police Station KARAK District KARAK

In - recognition of GOOD PERFORMANCE IN CASE FIR NO. 64 U/S 9 BCNSA. 2. FIR NO. 183 U/S 9 BCNSA. 3. FIR NO. 21 U/S 9 CNSA. 4. 13-10-4. FIR NO. 331 U/S 9-BCNSA ARRESTED CP PO HIBALAT SHAH R/O AZA KHIL POLICE STATION AZA KHIL.

O.B. No. 639

CASH BOUNTY RS. 200/-

Dated 14. 12. 2016

District Police Officer,
Nowshera

Handwritten signature and initials on the right side of the certificate.



N.W.F.P POLICE

COMMENDATION CERTIFICATE-III

Granted by NTSAR AHMAD KHAN

District Police Office Nowshera.

Granted to HC WASIM HAFIZ NO. 656 C.M.N Son of KHAIL NAWAZ

Resident of VILL: TARKHA KOI Police Station KARAK District KARAK

In - recognition of HIS GOOD PERFORMANCE DURING THE YEAR 2009-10

O.B. No. 827

CASH REWARD RS. 1000/-

Dated 15.6.2010

[Signature]
District Police Officer,
Nowshera

116
[Signature]

20



TRANSPARENCY INTERNATIONAL-PAKISTAN



DIRECTORATE OF ANTI-CORRUPTION ESTABLISHMENT, KHYBER PAKHTUNKHWA

C/S/ISRC

Certificate of Participation

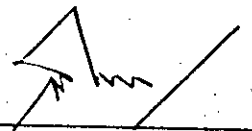
2/1/11/16/11

Mr./Ms QACEEM ASI CMM has participation in the workshop "Role of Civil Society in Eradication of Corruption" on 25th May, 2011 in Swat. Malakand Region III



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Swiss Agency for Development and Cooperation SDC


Nisar Ahmad Khan
Director,
Anti-Corruption Establishment,
Khyber Pakhtunkhwa



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Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Swiss Agency for Development
and Cooperation SDC

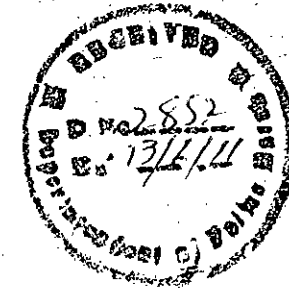


**TRANSPARENCY
INTERNATIONAL**
the global coalition against corruption



USAID
FROM THE AMERICAN PEOPLE

Certificate of Participation
This is to certify that



Mr/Ms QASIM KHAN ASI/ACE, KPK

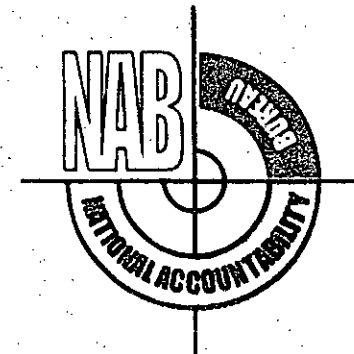
*Has participant in the workshop " Role of Civil Society in
Eradication of Corruption" on 28 April 2011 in D.I. Khan*

[Handwritten signature]

NISAR AHMAD KHAN

Director

Anti-Corruption Establishment
Khyber PakhtunKhwa



T.C
NW

(21)

QASIM/SRC
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2/4/11

OFFICE OF THE DISTRICT COORDINATION OFFICER KARAK

COMMENDATION CERTIFICATE

No. 440 Constable Noor Shahzad District Police Karak has played a Commendable role in control of fire on the hilltop of Dur Algada Union Council Palosa Sar (Karak).

The said constable controlled the fire with the help of his other colleagues at the risk of his life, therefore, he is hereby awarded cash reward of Rs.1000/- alongwith commendation certificate.

DISTRICT COORDINATION OFFICER KARAK

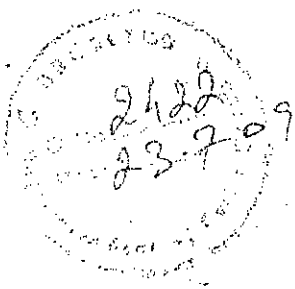
District Coordination officer Karak

OB/src/CAS/fo

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3/11/09 22/7/09

OB/src-222
22/7/09



T. C
[Handwritten mark]

Malik Rehman
(Advocate)
District Nazim Karak
N.W.F.P, Pakistan



Distt: Govt Karak
Distt: Complex Karak
Tel: 0927-211203
Fax: 0927-211234

Ref No: 250/DNK

Date: 16/07/09

COMMENDATION CERTIFICATE

On the recommendation of District Police Officer Karak, a Commendation certificate with cash award for amounting to Rs.1000/- is given to No. 440 Mr. Noor Shahzad showing good performance in connection with a dangerous fire erupted and burning valuable Trees and other articles at Dhora Algada District Karak.

OB/SRE/DASI/PO

[Handwritten signature]

District Police Officer
Karak
3/11/18/7/09

[Handwritten signature]

(MALIK-UR-REHMAN)
DISTRICT NAZIM KARAK

District Nazim
Karak

OB No - 275

DT- 18/7/09

T.C
[Handwritten mark]

24



N.W.F.P POLICE

COMMENDATION CERTIFICATE CLASS II

Granted By

MUHAMMAD MASOOD KHAN AFRIDI, PSP

Deputy Inspector General of Police, Kohat Region

To _____
OFFICER IN CHARGE NO. 440

Son of _____

Resident of Mohalla / Village _____

Police Station LATEMBER District KARAK

In recognition of

FIS GOOD PERFORMANCE IN CASE FIR NO. 322, DATED 8.12.2010

U/S 302/324/353/148/149 IPC, 3/4 E.S.A/7 ATA/13 AO

POLICE STATION LATEMBER.

CASH REWARD RS: 2000/-

No. 11927

Dated 2/12/10

Deputy Inspector General of Police
Kohat Region, Kohat

T.C
W

25



N.W.F.P POLICE

COMMENDATION CERTIFICATE

CLASS II

Granted By

MUHAMMAD MASOOD KHAN AFRIDI, PSE

Deputy Inspector General of Police, Kohat Region

To _____
CONSTABLE NOCP SHEHZAD NO. 4710

Son of _____

Resident of Mohalla / Village _____

Police Station LATEMBER

District KARAK.

In recognition of

FIS GOOD PERFORMANCE IN CASE FIR NO. 322, DATED 8.12.2010

U/S 302/324/353/148/149 IPC, 13/4 E.S.A/7 ATA/13 AO

POLICE STATION LATEMBER.

CASH REWARD RS: 1000/-

No. 11927

Dated 3/12/10

[Signature]
Deputy Inspector General of Police
Kohat Region, Kohat

T.S
~

26

North West Frontier Province Police



Commendation Certificate

CLASS I

Granted by

MALIK NAVEED KHAN

INSPECTOR GENERAL OF POLICE N.W.F.P.

To _____ HC C Noor Shahzad _____

Son of _____

District _____ NOWSHERA. _____

in Recognition of

SHOWED GOOD PERFORMANCE VIDE CASE FIR NO.1038 DATED

10.11.2009 U/S 5-GO, FIR No.1041 DATED 11.11.09 PS.

NOWSHERA CANTT.

(CASH REWARD OF RS.1500/-).

Dated.....20

(Malik Naveed Khan)
Inspector General of Police,
N.W.F.P.

T.C
w

Minuted



N.W.F.P POLICE

COMMENDATION CERTIFICATE CLASS II

Granted By

MUHAMMAD MASOOD KHAN AFRIDI, FSP

Deputy Inspector General of Police, Kohat Region

To

CONSTABLE NOOR SHEHZAD NO. 440

Son of

Resident of Mohalla / Village

Police Station

LATEMBER

District

KARAK.

In recognition of

HIS GOOD PERFORMANCE IN CASE FIR NO. 322, DATED 8.12.2010

U/S 302/324/353/148/149 IPC, 3/4 E.S.A/7 ATA/13 AO

POLICE STATION LATEMBER.

CASH REWARD RS: 1000/-

No.

11927

Dated

21/12/10

Deputy

[Signature]
Deputy Inspector General of Police
Kohat Region, Kohat

T.C

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Serial N.

15-CENSURES AND PUNISHMENTS-contd.

Granted acc-class-II by DIG/PKT. for his good per
in Cox Fil 322 dt 8-12-10 O/S 302/324/PS 3/148/148/PP-3/14
7ATA/13AD ps LTR vide his No 11927/A dt 31-12-10
Cash Reward Rs-1000/-

Mr.
District Police Officer
Karak

Granted a cc-III by DPO Karak Sajid Khan
recognition of showing good performance in offic
duty during visit of Chief Minister Isp, presence
to this Dist. Cash Reward Rs-1000/-

O.B No 216
Dt: 16.03.2012.

Mr.
District Police Officer
Karak

Granted acc-III by DPO Karak Mr. Sajid Khan
for his good performance during the
visit Karak on 11-10-2010.

O B 1075 Cash Reward Rs-200/-
12-10-10

Mr.
District Police Officer
Karak

Granted acc-III by Mr. Sajid Khan DPO Karak
for his good performance in Arrest of accused
in Cox Fil No 86 dt 4/10 O/S 302/324/PP-PS KM.

T.C

Mr.

Serial No.

14. COMMENDATORY ENTRIES—contd.

Commendation Certificate

Granted a C Commendation Certificate Distt. Nazim N. for his good performance in connection with a dangerous fire erupted and burning valuable Press and other articles at Dore Agada. Certificate Attached.

OB 775
18/7/09.

Signature
2009

(Commendation Certificate DCO KH)

Granted a ce-iii by MR. DCO KH for his good performance in control of fire on the hilltop of our Agada Palosa Sar.

OB 822
22/7/09.

Cash Reward Rs 1000/-

Signature
2009

Granted a cc-iii by Mr Sajid Khan of Okank for his good performance during the visit of hon. chief minister N.W.F.P to this Distt on 12-11-09.

OB 1213
13-11-09.

Cash Reward Rs-500/-

Signature
2009

Granted a ce-iii by Mr. Sajid Khan of Okank for his good performance for Range fire C.I.

OB 1

Cash Rewards Rs-500/-

Signature

21-2070

T.C
M

14. COMMENDATORY ENTRIES

Granted a cc-III by Mr. Nasir Ahmed Khan
Dpolkarak for his good performance

Cash Reward of Rs. 100/-

OB No. 1088

dt. 10/10/07

Station Police Officer

Granted a cc-III by Mr. Nasir Ahmed Khan
Dpolkarak for good performance in case FIR
No. 318 dt. 22-10-07 U/S 3/4/5 Exp: sub act 7(a), (c)
ATA 1997.

Cash Reward of Rs. 100/-

OB No. 1120

dt. 23-10-07

Station Police Officer

Granted cc-III by Mr. Sajid Khan of Karak
for good performance to set in fire
to inflame. Cash Reward: Rs 600/-

OB 706
24/6/08

Granted a cc-III by MR. Sajid Khan
Dpo Karak for his good performance
in Case FIR No 78 dt 26/6/09 U/S
324/353/13A0/3/4/Exp: Psterni

OB 724
26/6/09

Cash Reward Rs 500/-

T.C

Station Police Officer

CHARACTER ROLL OF

14—COMMENDATORY ENTRIES—concl.

Serial No.

Granted a cc-iii Mr. Sajid Khan D/o K. for his
good performance in Case FIR No 104 dt 26th 09

U/S 13A & ps S.S.

OB 1316
7-11-09

Cash Rewards Rs - 300/-

[Signature]
Inspector of Police

Granted a cc-iii by Sajid Khan D/o Kavak for his
good performance during the encounter with Po,
Rehmatullah and his party in Case FIR no 90

U/S 324/353/13A/B4 PC ps datamber.

OB 341 Cash Reward Rs-200/-
29/3/2010

[Signature]
Inspector of Police

Granted a cc-iii by D/o Kavak Mr. Sajid Khan
for his good performance in Case FIR No 115
U/S (9 CMA) dt 9-7-2010 ps SA and also
arrested because of namely Pos Haizrat
Uamal.

OB 786
12/7/2010

Cash Reward Rs - 300/-

[Signature]
Inspector of Police

Granted a cc-iii by Mr. Sajid Khan for his
good performance in Case FIR no 318 dt 13.9.10
U/S 324/353/186/187/148/148 ps TN

OB 962
10/11/10

Note.—Extra pages may be added if necessary and paged I.A, etc.

[Signature]

Granted acc 1st of DPO ...
in case FIR No 322 dt: 9-12-10 U/s 302/324/21675

7ATA/3/4 Exp: 1/14/14 PSLTR.

(32)

OB $\frac{1298}{1012/10}$

Cash Reward Rs - 500/-

[Signature]

Checked: *[Signature]*
Date: *[Signature]*

[Handwritten marks]

33

CHARACTER ROLL OF

15-CENSURES AND PUNISHMENTS-concl.

Serial No.

Granted acc to by Mir Aliqullah wazir D/o Wazir
for his good performance in officail duty

Cash Reward Rs 400/- OB 562
dt 19-07-2013.

[Signature]
District Police Officer
Karak

T.C
[Signature]

CITATION FOR GOVERNER'S MEDAL FOR OUT STANDING PERFORMANCE

(23)

The incorrigible character Asghar Khan s/o Gul Shahid Khan r/o Ghol Banda, Police station Khurram of Karak district was desperado, hardened gangster, and extremely diehard proclaimed offender. He was required to district Karak Police in seventeen cases including murder, attempted murder, subversive activities cases, robberies, theft, haraba, criminal intimidation and possession of illegal arms etc. He was expert in planting mines and explosive substances and was well versed in the use of hand grenades in the perpetuation of his subversive activities. He unleashed a reign of terror in the area and was a scourge for the entire populace.

In numerous instances, it is reported that he demanded extortion and ransom from the inhabitants of the area. On their refusal, he threatened them of dire consequences and subsequently in number of cases planted explosive materials near their abodes which caused loss to human life and property. On 06.03.2005, he caused a devastating explosion by using explosive substances near the house of Fateh Khan r/o Bahadar khel vide FIR No. 19 u/s 4 Exp: Subs: Act Police station, Khurram. Furthermore, he planted explosive materials in a telephone cable joint leading to the house of aforementioned Fateh Khan. Consequently, a cow passing over the cable touched the explosive materials which caused explosion and the cow was blown up to pieces. Resultantly, case vide FIR No. 91 dated 19.11.2005 u/s 4 Exp: Subs: Act Police station Khurram was registered against him.

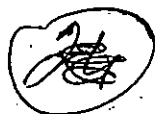
On 25.12.2006, he fixed another explosive device near the house of Niamat Ullah r/o Bahadar Khel. This resulted in the registration of the case vide FIR No. 109 dated 25.12.2006 u/s 4 Exp: Subs: Act Police station Khurram. On 23.06.2007 he hurled hand grenades into the house of one Muhammad Umar r/o Bahadar Khel. The explosion caused injuries to Mst. Bahazeer and Mst. Shazia. Case vide FIR No. 34 dated 23.06.2007 u/s 4 Exp: Subs: Act Police station Khurram was registered. On 23.01.2007 he fixed a mine near the main gate of Alam Di r/o Dareesh Khel. Consequently, a case vide FIR No. 07 dated 23.01.2006 u/s 4 Exp: Subs: Act Police station Khurram was registered against him and his cohort.

Proclaimed offender Asghar Khan killed Saif Ullah r/o Bahadar Khel vide case FIR No. 64 dated 19.07.2005 u/s 302 PPC Police station Khurram. Similarly, he fixed mine near the gate of one Rashid Nawaz r/o Bahadar Khel.

T.G.

Attested

To be true copy
Advocate




which caused a huge explosion. Resultantly minor school going girls namely Sakshama Bibi and Samina Bibi and one Gul Sahib Khan sustained serious injuries. Gul Sahib Khan later on succumbed to his injuries. Case vide FIR No. 06 dated 23.01.2008 u/s 7/ Exp. Subs. Act, 302/324 PPC Police station Khurram was registered. Thereafter on the night of 21.05.2008, he committed trespass into the house of one Shekh Saadi r/o Bahader Khel. He wanted to commit adultery with the women present there and on their resistance brutally killed Mst. Mulla Bibi and Mst. Hadija by way of making indiscriminate klashinkov firing on them. Case vide FIR No. 47 dated 21.05.2008 u/s 302 PPC Police station Khurram was registered.

As evident from the aforementioned narration, the notorious proclaimed offender Asghar Khan was a source of unrest and turmoil and a symbol of terror in the entire area. He had created a sense of complete insecurity in the area. Police conducted numerous raids on the suspected abodes of PO Asghar Khan but he was not found. It was reported that his entire family lived in North Waziristan agency and he had no family pressures to desist him from these criminal activities. Ultimately, in order to get rid of this menace, a strategy of proper intelligence collection and successful operational execution was devised by undersigned.

On 19th July 2008, the information about the presence of said diehard, notorious and hardened proclaimed offender in the hillock area of village Eidan Banda (Police station Khurram) was conveyed to the undersigned by the informers entrusted with this gigantic task.

The undersigned on receipt of the information rushed to the spot. Message was transmitted to all the nearest Police stations about the conduct of the raid on the spot. The local Police of Police station Khurram was asked to call the Special Police Force for assistance of Police in combating the miscreant. The undersigned briefed the Police strength and Special Police Force. The undersigned tactfully deployed the Police strength and members of the Special Police Force. The arduous terrain of the area made the task of the Police Force very difficult. However, the abode of the diehard miscreant was encircled. He attempted to flee away from the spot but on realizing the tight besiege laid by the Police, he took shelter in a hillock cave. The target of the trench where the miscreant armed with automatic weapon and hand grenade etc had taken refuge was dangerous and extremely risky job for the Police. After a detailed analysis of the situation, an operational strategy was evolved by the undersigned.

Attested

 To be true copy
 Advocate

T. C



which accused a huge explosion. Resultantly minor school going girls namely Rakhshanda Bibi and Samina Bibi and one Gul Sahib Khan sustained serious injury Gul Sahib Khan later on succumbed to his injuries. Case vide FIR No.06 dated 23.01.2008 u/s 3/4 Exp: Subs: Act, 302/324 PPC Police Station Khurram was registered. Thereafter, on the night of 21.05.2008, he committed trespass into the house of one Shekh Saadi r/o Bahader Khel. He wanted to commit adultery with the women present there and on their resistance brutally killed Mst. Multan Bibi and Mst. Hadija by way of making indiscriminate Kalashnikov firing on them. Case FIR No.47 dated 21.05.2008 u/s 302 PPC Police Station Khurram was registered.

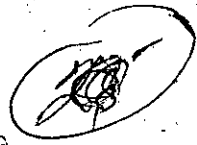
As evident from the aforementioned narration, the notorious proclaimed offender Asghar Khan was a source of unrest and turmoil and a symbol of terror in the entire area. He had created a sense of complete in-security in the area. Police conducted numerous raids on the suspected abodes of PO Asghar Khan but he was not found. It was reported that his entire family lived in North Waziristan Agency and he had no family pressures to desist him from these criminal activities. Ultimately, in order to get rid of this menace, a strategy of proper intelligence collection and successful operational execution was devised by undersigned.

On 19th July 2008, the information about the presence of said diehard, notorious and hardened proclaimed offender in the hillock area of village Eidar Banda (Police Station Khurram) was conveyed to the undersigned by the informers entrusted with this gigantic task.

The undersigned on receipt of the information rushed to the spot. Message was transmitted to all the nearest Police stations about the conduct of the raid on the spot. The local Police of Police station Khurram was asked to call the Special Police Force for assistance of Police in combating the miscreant. The undersigned briefed the Police strength and Special Police force. The undersigned tactfully deployed the Police Strength and members of the Special Police force. The arduous terrain of the area made the task of the Police Force very difficult. However, the abode of the diehard miscreant was encircled. He attempted to flee away from the spot but on realizing the tight besiege laid by the Police, he took shelter in a hillock cave. The target of the trench where the miscreant armed with automatic weapon and hand grenade etc had taken refuge was dangerous and extremely risky job for the Police. After a detailed analysis of the situation, an operational strategy was evolved by the undersigned.

T. C.
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resolutely, platoon commander Gul Bahadar and FC Qasim Mehmood No. 656 volunteered to put their lives at stake for precise targeting the criminal. It was very difficult to dislodge the proclaimed offender from the cave. The said Police officials under the guidance of the undersigned dislodged the proclaimed offender from the cave. The said Police officials under the guidance of the undersigned crawled towards the spot. The undersigned directly supervise the whole initiative. The Police officers while exhibiting high degree of bravery, courage and professionalism targeted the PO. The encounter continued for about three hours. The PO hurled hand grenades on the approaching Police party but the Police did not lose courage and was ultimately able to eliminate him without any loss to the Police party.



It is pertinent to add here that during this encounter between Police and the hardened criminal the courage of the below mentioned Police officers was exemplary and commendable. They exhibited bravery and courage of the highest order despite the looming danger to their lives. Recovery of klashnikov with 76 rounds, three hand grenades, two mobile phones with three SIMs and cash amount of Rs. 18160/- was effected from the possession of the PO. The Police party and the Special Police Force exhibited courage and gallantry during the encounter. The hardened criminal and mischief monger was shot dead without any loss to Police party. All the people of Karak including Mr. Rehmat Salam District Nazim Karak, Mufti Ajmal MNA, local MPAs and nazims etc appreciated the gallantry and courageous act of District Police.

Keeping in view the above facts, it is strongly recommended that the following Police officers may be awarded with Governor Police Medal in recognition of out standing performance displayed during encounter with hardened terrorist in the face of imminent danger to the their lives.

- 1. SI Platoon Commander Gul Bahader
- 2. FC Qasim Mehmood No. 656

Attested
[Signature]
 To be true copy
 Advocate

[Signature]
 (NISAR AHMED KHAN)
 PPM, PSP
 District Police Officer, Karak

T.G.
[Signature]

Accordingly, platoon commander Gul Bahadar and FC Qasim Mehmood No.656 volunteered to put their lives at stake for precise targeting the criminal. It was very difficult to dislodge the proclaimed offender from the cave. The said Police officials under the guidance of the undersigned dislodged the proclaimed offender from the cave. The said Police officials under the guidance of the undersigned crawled towards the spot. The undersigned directly supervise the whole initiative. The Police officers, while exhibiting high degree of bravery, courage and professionalism targeted the PO. The encounter continued for about three hours. The PO hurled hand grenades on the approaching Police party but the Police did not lose courage and was ultimately able to eliminate him without any loss to the Police party.

It is pertinent to add here that during this encounter between Police and the hardened criminal the courage of the below mentioned Police Officers was exemplary and commendable. They exhibited bravery and courage of the highest order despite the looming danger to their lives. Recovery of Kalashnikov with 76 rounds, three hand grenades, two mobile phones with three SIMs and cash amount of Rs.18,160/- was affected from the possession of the PO. The Police party and the Special Police Force exhibited courage and gallantry during the encounter. The hardened criminal and mischief monger was shot dead without any loss to Police party. All the people of Karak including Mr. Rehmat Salam District Nazim Karak, Mufti Ajmal MNA, local MPAs and Nazims etc. appreciated the gallantry and courageous act of District Police.

Keeping in view the above facts, it is strongly recommended that the following Police officers may be awarded with Governor Police Medal in recognition of out standing performance displayed during encounter with hardened terrorist in the face of imminent danger to their lives.

1. SI Platoon Commander Gul Bahder
2. FC Qasim Mehmood No.656

Sd/-

(NISAR AHMED KHAN)

PPM, PSP

District Police Officer, Karak

سفارشات برائے گورنر میڈل

26

مورخہ 19.07.2008 کو کرک پولیس اور انتہائی خطرناک اور بدنام زمانہ مجرم اشتہاری کسی اصغر خان شاہد خان سکٹہ غول بانڈہ کے مابین دیدہ عیدار بانڈہ (پولیس شیش خرم) میں ایک سخت مقابلہ ہوا۔ پولیس اہل قوت کے مدد اور قابل ستائش کارکردگی کی وجہ سے اصغر خان ولد گل شاہد خان لقمہ اجل بن گیا۔ اس بڑک موٹے بڑے مجرم آفران نے قابل ٹھہرنے والی کارکردگی، دلیری اور پیشہ دراندہ مہارت کا مظاہرہ کیا۔ اس مقابلے میں جن پولیس آفران سے خطرناک ملزم کا ڈٹ کر مقابلہ کیا اور اس کو پسپائی پر مجبور کیا۔ وہ گورنر صوبہ سرحد پولیس میڈل حاصل کرنے کے حقدار ہیں۔ مذکورہ بالا وقوعہ کا پس منظر درج ذیل بیان ہے۔

اصغر خان ولد شاہد خان ساکن غول بانڈہ تھانہ خرم ضلع کرک پولیس کوسٹری (17) ستین مقدمات میں مطلوب تھا۔ ان سترہ مقدمات میں قتل، اقدام قتل، بارودی سرنگیں اور تخریبی کاروائی، سرقت، الجبر، سرقت عام، جراثیم، غیر قانونی اسلحہ کے مقدمات شامل تھے۔ مجرم اشتہاری اصغر خان بارودی سرنگیں بچھانے اور تخریبی کاروائیوں میں ہینڈ گرنیڈز کے استعمال میں ماہر تھا۔

یہ امر قابل ذکر ہے کہ اصغر خان علانے کی عوام میں دہشت کی علامت تھا۔ وہ لوگوں سے ناچار ہتھیار وصول کرتا تھا۔ انکار کی صورت میں خطرناک نتائج کی دھمکیاں دیتا تھا اور پھر لوگوں کے خلاف تخریبی کاروائیاں کرتا تھا۔ سال 2005 میں مجرم اشتہاری اصغر خان نے فتح خان سکٹہ بہادر خیل کی بیٹھک کے ساتھ رات کو دھاکہ کیا۔ جس پر مقدمہ نمٹا۔ نمبر 19 مورخہ 06.03.2005 مجرم Act: Subs: Exp: 4 تھانہ خرم درج ہوا۔ اسی طرح مورخہ 19.11.2005 کو مجرم اشتہاری اصغر خان نے ٹیلیفون تار کے جائینٹ میں دھاکہ خیز مواد رکھا تھا۔ اس کے نتیجے میں ایک گائے تار کے ساتھ لگنے سے ہلاک ہوئی اور نتیجتاً دھاکہ ہوا۔ یہ امر قابل ذکر ہے کہ تار مذکورہ بالا فتح خان کے گھر تک بچھائی گئی تھی۔ جس پر مقدمہ بحوالہ علت نمبر 91 مورخہ 19.11.2005 مجرم Act: Subs: Exp: 4 درج ہوا۔

مورخہ 25.12.2006 کو ملزم اصغر خان نے نعمت اللہ ساکن غول بانڈہ کے گھر کے نزدیک دھاکہ خیز مواد بچھایا تھا۔ جس کے نتیجے میں مقدمہ علت نمبر 109 مورخہ 25.12.2006 مجرم Act: Subs: Exp: 4 تھانہ خرم درج کیا گیا۔ مورخہ 23.06.2007 کو مجرم اشتہاری اصغر خان نے محمد عمر ساکن بہادر خیل کے گھر ہینڈ گرنیڈز حملہ کیا۔ جس سے مسماہ بینڈی اور مسماہ شاز یہ شدید زخمی ہوئیں اور مال مویشی کو نقصان پہنچا۔ پولیس نے مقدمہ علت نمبر 34 مورخہ 23.06.2007 مجرم Act: Subs: Exp: 3/4 تھانہ خرم قائم کیا۔ مورخہ 01.01.2008 کو اصغر خان مجرم اشتہاری نے علم دین سکٹہ دریش خیل کے گھر صدر دروازے کے باہر بارودی سرنگ بچھائی جس کی ہلاکت

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Advocate

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پر مقدمہ علت نمبر آ مورخہ 23.01.2008 بجرم Act: Subs: Exp: 4 تھانہ خرم درج کیا۔
 اصغر خان نے سیف اللہ سکنہ بھادر خیل کو مقدمہ علت نمبر 64 مورخہ 19.07.2005 بجرم PPC
 قتل کیا تھا۔ اس طرح مجرم اشتہاری اصغر خان نے رشید نواز ساکن بھادر خیل کے گھر کے صدر دروازے کے کنارے
 بارودی سرنگ بچھالی تھی۔ بارود پھٹ کر زوردار دھماکہ ہوا جس سے مسماہ زرخندہ بی بی، شمینہ بی بی اور گل صاحبہ خان
 زخمی ہوئے۔ بعد میں گل صاحبہ خان زخموں کی تاب نہ لا کر جان بحق ہوا۔ جس پر مقامی پولیس نے مقدمہ علت نمبر 64
 مورخہ 23.01.2008 بجرم Act: Subs: Exp: 302/324 PPC، 3/4 تھانہ خرم درج کیا۔
 مورخہ 21.05.2008 کی رات کو مجرم اشتہاری اصغر خان نے شیخ سعدی سکنہ بھادر خیل کے گھر میں مداخلت کی جسے جان
 نمانہ کا ارتکاب کیا۔ وہ بد فعلی کرنے کا ارادہ رکھتا تھا۔ انکار پر اس نے مسماہ ملتان بی بی اور مسماہ حدیجہ کو بے دردی سے قتل
 کر دیا۔ پولیس نے مقدمہ علت نمبر 47 مورخہ 21.05.2008 بجرم PPC 302 تھانہ خرم درج کیا۔ اسی بناء پر
 پر کرک پولیس مسلسل مجرم اشتہاری اصغر خان کے گرفتاری کی تک دد کرتی رہی۔ اس کے مشکوک بود باش بر لا تعداد
 چھاپے لگائے گئے۔ مگر کامیابی نصیب نہ ہوئی۔

مجرم اشتہاری اصغر خان علاقہ میں دہشت کے علامت تھا۔ اور اس نے پورے علاقے میں خوف و ہراس
 پھیلایا ہوا تھا۔ مجرم اشتہاری اصغر خان کی گرفتاری پولیس کیلئے ایک چیلنج کی حیثیت رکھتی تھی۔ اس بناء پر زیر دستخطی نے اس
 ناسداری کی گرفتاری کیلئے سب سے زیادہ محنت عملی تیار کی۔ مورخہ 19 جولائی 2008 کو مجرم اشتہاری اصغر خان کے درمیان عبدالجبار
 کے پر بازی علاقوں میں موجودگی کی اطلاع بذریعہ مجرمان موصول ہوئی جن کو اس مقصد کیلئے خصوصی ٹاسک حوالہ کیا گیا
 تھا۔ زیر دستخطی کو اطلاع موصول ہوتے ہی موقع پر روانہ ہوئے۔ اور نزدیکی تھانوں کو موقع پر پہنچنے کی ہدایت جاری کر دی
 تھانہ خرم کو پیش پولیس فورس کو مطلع کرنے اور پولیس کی امداد اور مجرم اشتہاری کیساتھ مقابلہ کرنے کو کہا گیا۔

موقع پہنچ کر زیر دستخطی نے پہلے تمام فورس کو مناسب ہدایات جاری کی۔ پھر فورس کو پیشہ درانہ مہارت کے ساتھ
 ترتیب دی۔ گوکہ یہ علاقہ جہاں مجرم اشتہاری موجود تھا پولیس اپریشن کیلئے نہایت دشوار اور کٹھن تھا۔ مگر پولیس نے مجرم
 اشتہاری کی پناہ گاہ کو غاسرہ میں لے لیا۔ مجرم اشتہاری نے بھاگ نکلنے کی کوشش کی۔ مگر پولیس کی مضبوطی اور منظم صحرا کو
 دیکھ کر اس نے ایک غار میں پناہ لی۔ وہ غار جس میں خود کار ہتھیار اور بینا گرنیڈ سے لیس مجرم اشتہاری مورچہ زن تھا پولیس
 پارٹی کیلئے اس کو وہاں زبرد کرنا انتہائی خطرناک کام تھا۔

زیر دستخطی نے حالات اور واقعات کا تفصیلی جائزہ لیکر حکمت عملی وضع کی۔ اس حکمت عملی کے تحت بلا ٹون کمانڈر
 گل بہار اور کانسٹیبل قاسم محمود نے جان کی بازی لگا کر مجرم اشتہاری کو ہدف بنانے کیلئے آگے بڑھنے کا عزم کیا۔ مجرم
 اشتہاری کو پہاڑی غار میں بے دخل کرنا نہایت مشکل کام تھا۔ مذکورہ بالا پولیس آفسران زیر دستخطی کی ہدایات پر عمل کرتے
 ہوئے اور ریگتے ہوئے دیق پر پہنچ گئے۔ زیر دستخطی بلا واسطہ اسی عمل کی نگرانی کر رہے تھے۔ پولیس آفسران نے جرات اور

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 Advocate

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پیشہ درانہ مہارت کا مظاہرہ کرتے ہوئے اس ڈھلرناک ملازم کو نشانہ بنایا۔ یہ مقابلہ 3 گھنٹے جاری رہا۔ نثرم
 آگے بڑھنے والے پولیس آفسران پر گرنیڈ سے حملہ کیا۔ لیکن انہوں نے ہمت نہ ہاری۔ اور مجرم اشتہاری کو ٹھکانے سے
 میں کامیاب ہوئے۔ پولیس آفسران نے اپنے جانوں کی پرواہ کئے بغیر مقابلہ کیا اور کرک پولیس کی تاریخ میں ایک
 باب قائم کیا۔ مجرم اشتہاری کی قبضہ سے کلاشن کوف، 3 ہینڈ گرنیڈ، 2 موبائل فون، 3 سیم اور نقد رقم مبلغ 160، 18
 روپے برآمد کئے۔ پولیس نفری اور پشیل پولیس فورس نے بہادری اور شجاعت کا مظاہرہ کیا اور مجرم اشتہاری کو گرفتار کیا
 تک پہنچایا۔ کرک کی عوام اور ڈسٹرکٹ ناظم رحمت سلام نصاب، MNA مولانا مفتی اجمل صاحب مقامی ایم این ایز اور
 ناظمین نے پولیس کی کارکردگی کو بخیر نظر استھان دیکھا۔

مندرجہ بالا حقائق کو مد نظر رکھ کر ذیل پولیس آفسران گورنر پولیس میڈل کے مستحق قرار پائے کیونکہ انہوں نے بہتر
 معمولی جرات اور پیشہ درانہ مہارت کا مظاہرہ کیا ہے۔

۱۔ پلاٹون کمانڈر گل بہادر۔

۲۔ کانسٹیبل قاسم محمد نمبر 656۔

(Signature)
 شہزاد احمد خان
 ڈسٹرکٹ پولیس آفیسر کرک

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To be true copy
Advocate

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NORTH WEST FRONTIER PROVINCE



CHIEF MINISTER'S MEDAL FOR VALOUR

Granted by Mr. Amir Haider Khan Hoti
Chief Minister NWFP

TO

Constable Qasim Mehmood No. 656

T.C. J

In Recognition of His Bravery & Valour

Dated: 14 /03/2009

A. H. Khan
Chief Minister

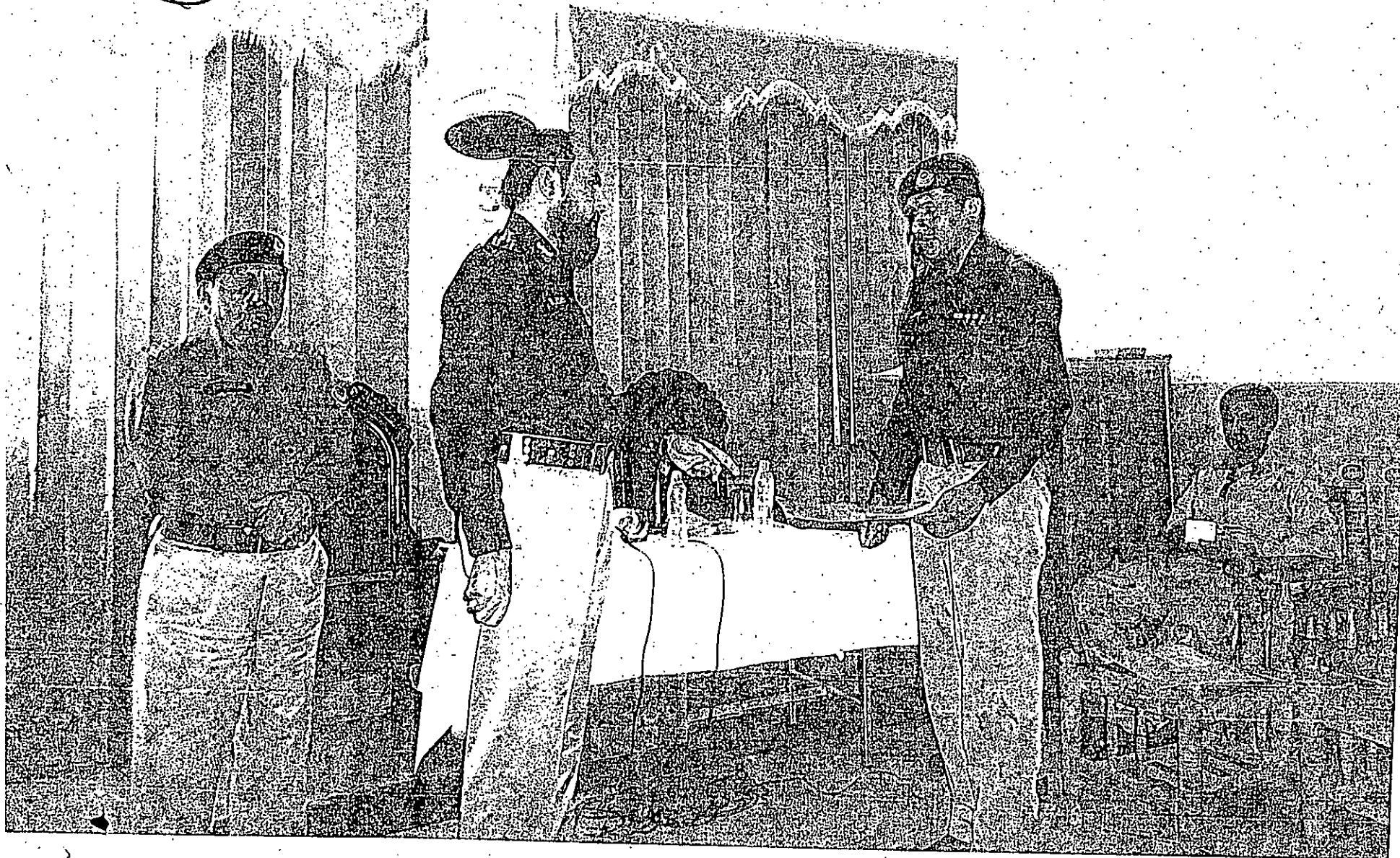
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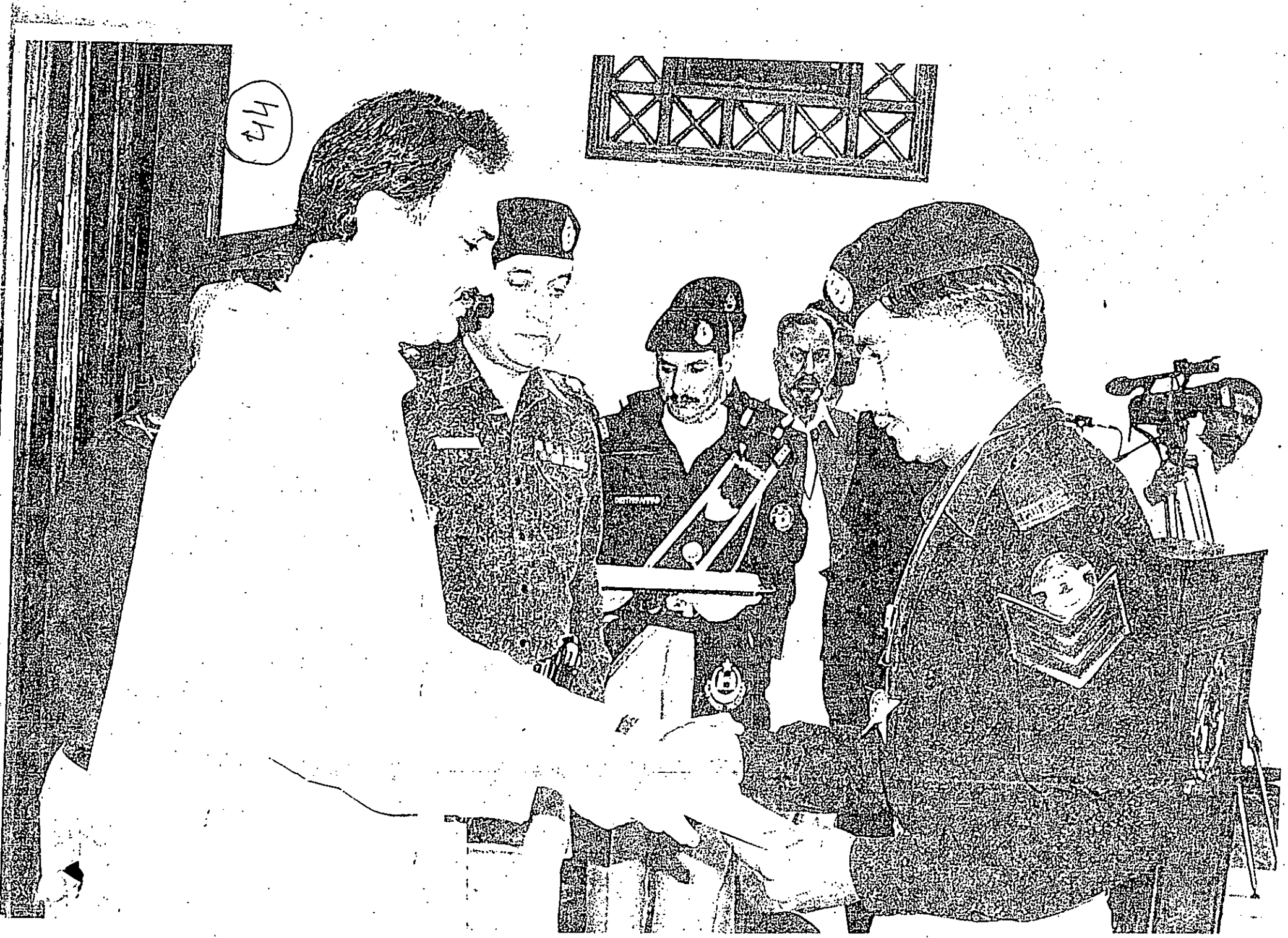
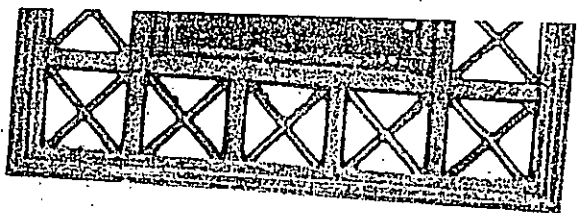
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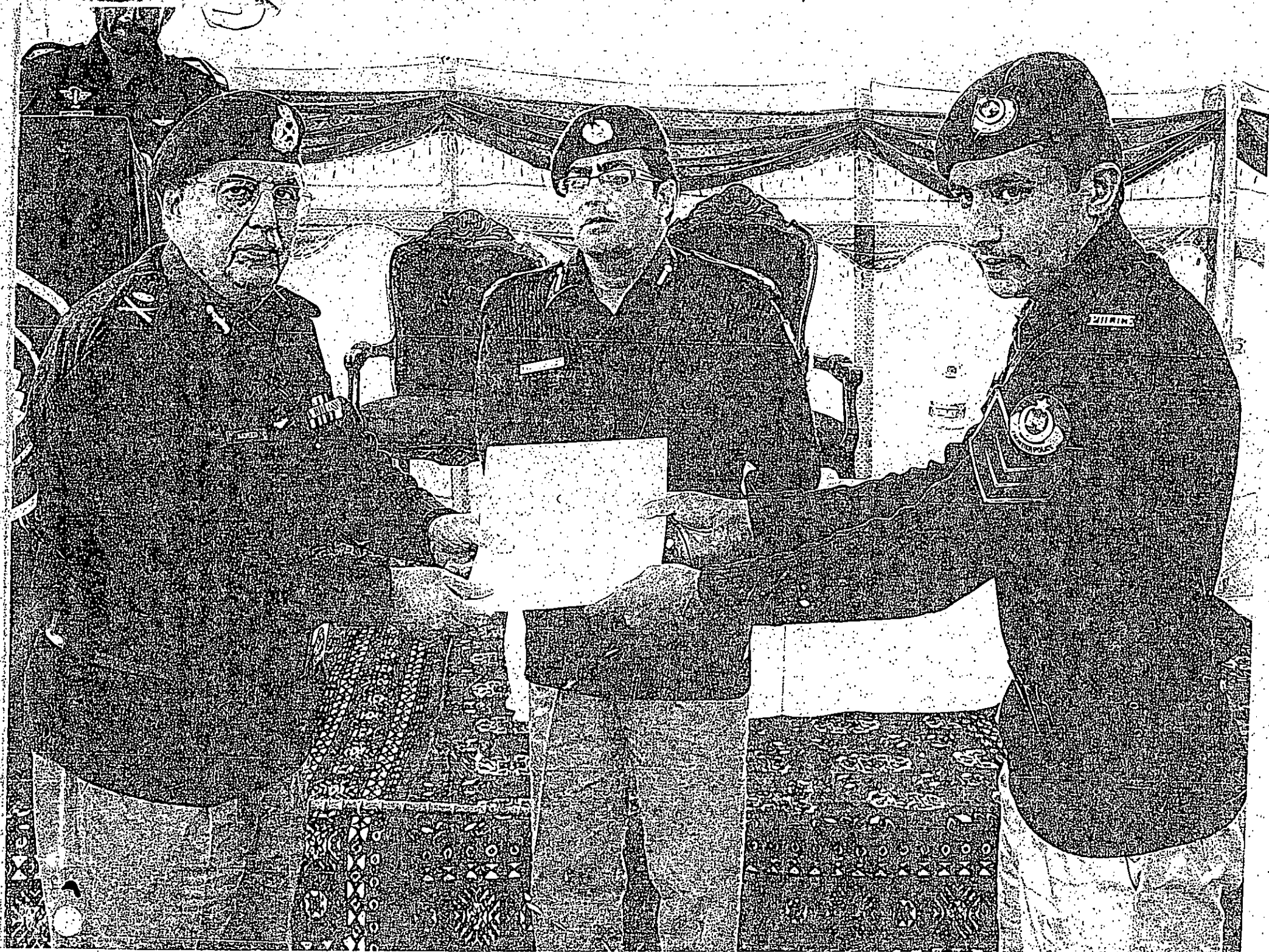


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Amended
Standing Order No. 6/2008
Accelerated/out of turn promotion and selection
For in service training/course.

Annex. 1
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To encourage officers who demonstrate exceptional performance, gallantry and devotion, beyond the call of duty, the Provincial Police Officer or Capital City Police Officer or the City Police Officer as the case may be, may on the recommendation of a Committee comprising of three officers not below the rank of Deputy Inspector General of Police including the Deputy Inspector General of Police of the Region concerned who will represent the case recommended by the Region/Capital City/City Police, promote out of turn such officers of junior ranks to the next higher rank up to inspector. The Committee shall ensure that only cases of exceptional performance, bravery and devotion are recommended and the ordinary/routine cases are avoided. Such promotions shall be treated as ad-hoc and will be regularized when the officers so promoted have successfully qualified the training course prescribed, if any. Such promotees shall be placed at the bottom of promotion list drawn up for that year. The provincial Police Officer may select such officers out of turn for such a prescribed course.

2. A Police Officer of junior rank (up-to Inspector) receiving the award of Quaid-e-Azam Police medal and or President Police medal shall be promoted in the first available substantive vacancy of the next higher rank up to Inspector which occurs in the district, area or Unit in which such officer is serving. This would be done automatically with receipt of above mentioned medals and without the proceedings of the committee.

3. The contents of this Standing Order shall be operative with effect from the date of its issuance.

(Malik Naveed Khan)
Provincial Police Officer,
N.W.F.P Peshawar.

No. 4282, 4327/C-I, dated Peshawar, the 4 June, 2008.

Copy forwarded to

1. All heads of Police Offices in NWFP for information and necessary action
2. M.S. to Governor, NWFP, Peshawar, for information.
3. P.S.O to Chief Minister, NWFP, Peshawar, for information.
4. Chief Secretary, Govt. of NWFP, Peshawar.
5. Secy: Govt. of NWFP, Home & TAs Deptt. Peshawar.
6. Director General, National Police Bureau, Ministry of Interior, Islamabad.

T.C
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Attested
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To be true copy
Advocate

(47) *Amir* 17
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ACCELERATED/OUT OF TURN PROMOTION AND SELECTION FOR IN SERVICE TRAINING/COURSE.

To encourage officers who demonstrate exceptional performance, gallantry and devotion, beyond the call of duty, the Provincial Police Officer or Capital City Police Officer or the City Police Officer as the case may be, may on the recommendation of a Committee comprising of three officers not below the rank of Deputy Inspector General of Police including the Deputy Inspector General of Police of the Region concerned who will represent the case recommended by the Region/Capital City/City Police, promote out of turn such officers of junior ranks to the next higher rank up to Inspector. The Committee shall ensure that only cases of exceptional performance, bravery and devotion are recommended and the ordinary/routine cases are avoided. Such promotions shall be treated as ad-hoc and will be regularized when the officers so promoted have successfully qualified the training course prescribed, if any. Such promotees shall be placed at the bottom of promotion list drawn up for that year. The Provincial Police Officer may select such officers out of turn for such a prescribed course.

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3. The contents of this Standing Order shall be operative with effect from the date of its issuance.

Malik Naveed Khan
(MALIK NAVEED KHAN)
Provincial Police Officer,
N.W.F.P., Peshawar.

5367-8
No. 11-6-08
1. All SAs
2. DSO Investigator
3. Inspector
4. All SAs
5. Line Officer
6. OHC/SAC

No. 4282/4327 C-1, dated Peshawar, the 4 June, 2008.

Copy forwarded to

1. All heads of Police Offices in NWFP for information and necessary action.
2. M.S. to Governor, NWFP, Peshawar, for information.
3. P.S.O. to Chief Minister, NWFP, Peshawar, for information.
4. Chief Secretary, Govt. of NWFP, Peshawar.
5. Secy: Govt. of NWFP, Home & TAs Deptt. Peshawar.
6. Director General, National Police Bureau, Ministry of Interior, Islamabad.

No. 19/14
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Advocate

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(48) Annexure - E

Phone No: 9260112
Fax No: 9260114

From:- The Dy. Inspector General of Police,
Kohat Region, Kohat.

To :- The Provincial Police Officer,
NWFP, Peshawar.

No. _____ /EC, Dated Kohat the 19/5 /2009.

Subject:- RECOMMENDATION FOR ACCELERATED PROMOTION

MEMORANDUM:

Kindly refer to this office Memo: No.2022/EC, dated 12.03.2009.

Asghar Khan S/O Gul Shahid Khan resident of Ghool Banda Police Station Khurram was a notorious proclaimed offender and hardened criminal who was a source of unrest, turmoil and symbol of terror in the entire area. On 19th July, 2008, an information about the presence of said diehard proclaimed offender in the hillock area of village Eidar Banda Police Station Khurram was received to Police. A raiding Police party rushed to the spot. The criminal took shelter in the hillock cave. According to the record platoon commander Gul Bahader and FC Qasim Mehmood No.656 volunteered to put their lives at stake for targeting the criminal. They moved forward and while exhibiting bravery and courage targeted the criminal. The criminal was resultantly killed. Proper case vide FIR No.69 dated 19.07.2008 under section 324/353 PPC, 13AO & Exp. Sub Act Police Station Khurram was registered. Platoon Commander Gul Bahader and FC Qasim Mehmood No.656 exhibited bravery and courage of the highest order despite the looming danger to their lives. Both were recommended for "Chief Minister's Medal for Valour". The medal was granted to both the Police Officers on 14.03.2009. Gul Bahader has already been promoted to the rank of Platoon Commander. As regards FC Qasim Mehmood No.656 he has joined Police recently and his name neither exists on promotion lists A-1 nor B-1. Furthermore Chief Minister's medal for valour has been granted to FC Qasim Mehmood No.656.

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Advocate

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F.C Qasim Mehmood No.656 is recommended accelerated promotion in the meaning of standing order No.6/2008 please.

(MUHAMMAD IDREES)
C.M.M / P.S.P
Dy: Inspector General of Police,
Kohat Region, Kohat

No. 4119 /EC.

Copy to District Police Officer, Karak for information with reference to his Memo: No.6869/LB, dated 13.05.2009.

Ami

(MUHAMMAD IDREES)
C.M.M / P.S.P
Dy: Inspector General of Police,
Kohat Region, Kohat

SRC
for inspection



Mr
District Police Officer
Karak
22/5

Attested
[Signature]
To be true copy
Advocate

T.S
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From : The Provincial Police Officer,
NWFP Peshawar.

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

No. 15419/E-11 dated Peshawar the 22.06.2009.

Subject: RECOMMENDATION

Memo.

Please refer to your Memo No. 2022/EC dated 12.03.2009 and 4118/EC dated: 19.05.2009.

The recommendation regarding out of turn promotion as offg: Head Constable on adhoc basis of constable Qasim Mehmood No. ___ of Kohat Region has thoroughly been examined by the Accelerated Promotion Committee in its meeting held on 27 & 28.04.2009 and recommended him for adhoc promotion as offg: Head Constable but he well not claim seniority over his senior till his own turn for promotion as offg: Head Constable after undergoing necessary courses etc.

Attested
To be true copy
Advocate.

(ABDUL MAJEED KHAN MARWAT)

PSP

Add: IGP/Headquarters.
For Provincial Police Officer.
NWFP Peshawar.

T. S.
Zur

From: The Provincial Police Officer,
NWFP Peshawar

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30/11/09

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

No. *15419* /E-II dated Peshawar the *22* / *6* / 2009.

Subject: RECOMMENDATION

Memo.

Please refer to your Memo No. 2022/EC dated 12.04.2009 and 4118/EC dated 19.05.2009.

The recommendation regarding out of turn promotion as offg: Head Constable on adhoc basis of Constable Qasim Mehmood No. 4156 of Kohat Region has thoroughly been examined by the Accelerated Promotion Committee in its meeting held on 27 & 28. 04.2009 and recommended him for adhoc promotion as offg: Head Constable but he will not claim seniority over his seniors till his own turn for promotion as offg: Head Constable after undergoing necessary courses etc.

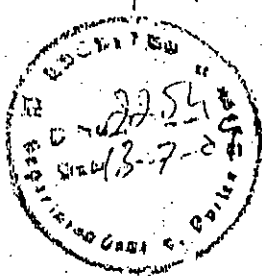
S682
30/6/09
E/C/DPO/Kohat

(ABDUL MAJEED KHAN MARWAT)
PSP
Addl. IGP/Headquarters
For Provincial Police Officer,
NWFP Peshawar.

Record maintained
and information
the const. also rank
necessary for his
Record maintained

Asst/SRE
For n/a action.

[Handwritten Signature]
DIO POLICE
KOHAT



District Police Officer
(Kohat)
[Handwritten Signature]
22/5/09

Attested
[Handwritten Signature]
True true copy
Advocate

D No. 1746 DT 22-5-09

Sent to SRC
[Handwritten Signature]
01.22.5.09

LC
[Handwritten Mark]

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Annexure - 1

Phone No: 9260112.
Fax No: 9260114.

From: The Dy. Inspector General of Police,
Kohat Region, Kohat.

To: The District Police Officer, Karak

No: / EC, Dated Kohat the / / 2009

Subject: ACCELERATED PROMOTION TO THE RANK OF HEAD
CONSTABLE.

Memorandum

The Provincial Police Officer, NWFP Peshawar vide his Memo No.20132/E-II, dated 12.08.2009 has directed that the matter may be disposed off at the Regional level depending upon the availability of vacancies.

Constable Sar Muhammad No.539 and Nek Muhammad No.153 of your District were called in Orderly Room held in this office on 17.09.2009, their case for accelerated promotion was perused by the undersigned and come to the conclusion that they can be given a promotion as C-II Head Constable at the District level Karak, hence they are approved for as C-II / promotion Head Constable please

Necessary order at District level be issued under intimation to this office.

Stamp: NO 22 - 26/9/09

(Signature)
(ABDULLAH KHAN) P.S.P
Dy. Inspector General of Police,
Kohat Region, Kohat.

No: / EC.

Copy of above is submitted to the Provincial Police Officer, NWFP, Peshawar for favour of information with reference to his Memo: No.20132 /E-II dated 12.08.2009 please.

ASIS/SRE

(Signature)
3/11/09

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(Signature)
(ABDULLAH KHAN) P.S.P
Dy. Inspector General of Police,
Kohat Region, Kohat.

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ORDER

Departmental promotion Committee comprising of the following Officers is constituted to examine / consider the promotion of suitable officials against the available vacancies in the rank of Head Constables in this district Police in the light of laid down rules.

- | | | |
|----|---|-----------|
| 1. | Mr. Sajid Khan Mohmand (DPO Karak) | Chairman. |
| 2. | Mr. Anwar Saeed Kundi, SP Inv: Wing Karak | Member. |
| 3. | Mr. Javed Khan, DSP Hqrs, Karak | Member. |
| 4. | Falak Nawaz, Inspector Legal | Member. |

Meeting of the committee will be held on 05.10.2009, at 1100 Hrs in the office of District Police Officer Karak.


District Police Officer Karak

OFFICE OF THE DISTRICT POLICE OFFICER KARAK

No. 13030-33/EC Dated 1/10 2009

Copy to the:-

- | | | |
|----|---------------------|-----------------------------------|
| 1. | SP Inv: Wing, Karak | } For information and compliance. |
| 2. | DSP Hqrs Karak | |
| 3. | Inspector Legal | |


District Police Officer Karak

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PERFORMA FOR ACCELERATED PROMOTION

S.NOs	NAME AND RANK/NUMBER	DATE OF BIRTH	DATE OF ENLISTMENT	EDUCATION	COURSES	Entries				Remarks	
						GOOD	MAJ-OR	MIN-OR	OTHER	General Remarks	D.P.C Remarks
1.	Constable Qasim Muhmood No.656	31.12.1988	12.06.2007	10 th	Recruit course	03				Recommended by P.P.O. NWFP Pesh: as offg: HC vide his letter No. 15419/E-II dated 22.06.2009 & DIG/P Kohat Region Kohat Endst: No. 5682/EC dt; 30.06.2009.	
2.	Constable Sar Muhammad No.539	15.10.1969	09.09.1991	FA	Recruit course	20		02	02	As recommended by DIG/P Kohat Region Kohat vide his Memo: No. 8254/EC dt: 19.09.2009 for promotion to the Rank of C-II HC. At present there is no vacancy of C-II HC.	
3.	Constable Nek Muhammad No. 153	15.05.1964	24.06.1984	10 th	1. Recruit course A.T.S course	25		02	05	As recommended by DIG/P Kohat Region Kohat vide his Memo: No. 8254/EC dt: 19.09.2009 for promotion to the Rank of C-II HC. At present there is no vacancy of C-II HC.	

Senior promotion comes in his present position as Head of the incumbent courses on turn as Head of the incumbent courses. Copy of above is sent to NWFP, Peshawar for favour of information with reference to his Memo. No. 20152

Phone No: 9260112.

Fax No: 9260114.

From:- The Dy. Inspector General of Police,
Kohat Region, Kohat.

To :- The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

No. _____ /EC, Dated Kohat the 31/12 /2010.

Subject:- **RECOMMENDATION FOR PROMOTION ON ADHOC BASIS
UNDER STANDING ORDER NO.6/2008**

MEMORANDUM

It is submitted that District Police Officer, Karak has recommended the Police Officer / Official for accelerated promotion to the next higher scale under Standing Order No.6/2008 on the following grounds:-

Police of Karak District perceived the anti social activities of Proclaimed Offender Mumtaz Khan alias Mumtazay wanted to Police in 9 criminal cases including murder, attempted murder, dacoity and other crimes, a comrade of notorious arrested proclaimed offender Rehmat Ullah. He was reportedly engaged in reorganizing the Rehmat Ullah criminal gang. Therefore Police started efforts for his arrest.

On the night of 07.12.2010, credible information about the presence of said proclaimed offender along with other criminals in the house of arrested proclaimed offender Rehmat Ullah son of Gul Raees resident of Warana Musakan was collected by Head Constable Hakeem Shah, Qismat Khan and F.C Afsar Ali. Therefore, Police party comprising SI/SHO Police Station Yaqoob Khan Shaheed (Takht-e-Nasrati), SI Abid Khan Incharge Rescue -15 and Khaliq Badshah Incharge QRF in order to reinforce the leading posse of Police reached the spot.

Raid was conducted on the spot. Mumtaz Khan alias Mumtazay on seeing the Police strength climbed up the roof and attempted on the lives of Police Strength by way of burling hand grenade on them. Muhammad Riaz SHO and Hakeem Shah sustained injuries. In the meanwhile accused Amal Rehman hurled another hand grenade which hit the womenfolk of the houses resultantly one of the ladies lost life while 6 sustained injuries. Head constables Hakim Shah, Qismat Khan and constable Afsar Ali exhibited bravery and courage while combating against the diehard criminal and he was shot dead. The remaining accused attempted on the lives of Police party by way of making firing on them. Constable Noor Shahzad while displaying professionalism and efficiency, drag out injured SI Muhammad Riaz from inside of the houses looming danger to his own life. The Police strength completely besieged the houses and accordingly the Amal Rehman, Abid Rehmatn, Amir Ullah and Zar Bangash were arrested and recovery of 01-Kalashnkove, 02-live Hand Grenade and 03-Pisotls were effected. Thus the insurgency of the gang was curbed. Proper case vide FIR No.322 dated 08.12.2010 U/S 302/324/353/148/149 PPC 3/4 E.S.A /7ATA /13AO was registered in Police Station Latamber.

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In recognition of the performances displayed by the following Police Officers, they are recommended for accelerated promotion to the next higher ranks noted against their name:

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1. HC. Hakeem Shah to the rank of Offg: ASI.
2. HC. Qismat Khan to the rank of Offg: ASI.
3. Constable Afsar Ali to the rank of Head Constable.
4. Constable Noor Shahzad to the rank of Head Constable.

(M.MASOOD KHAN AFRIDI)PSP
 Dy: Inspector General of Police,
 Kohat Region, Kohat.

No. 11923-24 /EC, dated Kohat the _____ /2010.

Copy to District Police Officer, Karak for information w/r to his
 Memo: No.9067/EC, dated 21. 2010.

(M.MASOOD KHAN AFRIDI)PSP
 Dy: Inspector General of Police,
 Kohat Region, Kohat.

S.R. - Justice Legal

[Handwritten signature]
 27/11/2010

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(57)

From : The Provincial Police Officer,
Khyber Pakhtunkhwa
Peshawar

To : The Deputy Inspector General of Police,
Kohat Region

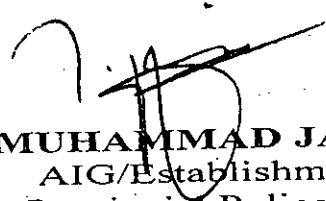
No. 15512 /E-II dated Peshawar the 07/7 /2011

Subject: **RECOMMENDATION FOR PROMOTION ON ADHOC
BASIS UNDER STANDING NO. 6/2008.**

Memo. Please refer to your office letter No. 11923-24/EC
dated 31.12-2010.

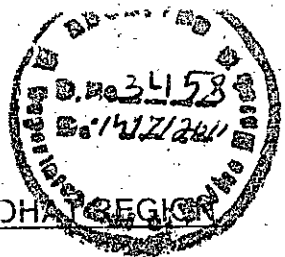
The case of the following HCs/Constables for
promotion to the rank of next higher scale was thoroughly
examined by Accelerated Promotion Committee in its meeting
held on 04.06.2011 and recommended as noted against
their names.

S.No	Names	Recommendation
1.	HC Hakeem Shah	Recommended him for adhoc promotion as ASI under Standing Order No.6/2008
2.	HC Qismat Khan	Already recommended in other case
3.	Constable Afsar Ali	Recommended him for adhoc promotion as HC under Standing Order No.6/2008
4.	Constable Noor Shahzad	Recommended him for adhoc promotion as HC under Standing Order No.6/2008


(MUHAMMAD JAFER)
AIG/Establishment,
For Provincial Police Officer,
Khyber Pakhtunkhwa
Peshawar

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POLICE DEPARTMENT

KOHAT REGION

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ORDER.

In the light of Provincial Police Officer, Khyber Pakhtunkhwa Peshawar Memo: No.15512/E-II, dated. 07.07.2011, Memo. No.15527/E-II, dated 07.07.2011 and Memo: No.581/E-II, dated 08.07.2011 the following Police personals of Karak & Hangu District are hereby promoted on Adhoc basis under standing order No.6/2008.

S.No.	Rank & Name	Promoted
1.	ASI. Aleem Khan	As Offg: SI
2.	HC. Hakim Shah	AS Offg: ASI
3.	HC. Qismat Khan	AS Offg: ASI
4.	Const. Afsar Ali	AS Head Constable
5.	Const. Noor Shahazad	As Head Constable

OASIS/RE

3/3/14/7/2011

OB 552

DT 14-07-2011 (M.MASOOD KHAN AFRIDI)PSP
Dy: Inspector General of Police,
Kohat Region, Kohat.

No 6158-62 /EC, dated Kohat the 13/07 /2011.

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

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar w/r to his Memo: No. quoted above.
2. District Police Officer, Hangu w/r PPO KPK Peshawar Memo: No. 15527/E-II, dated 07.07.2011. Copy enclosed.
3. District Police Officer, Karak w/r PPO KPK Peshawar Memo: No. 15512/E-II, dated 07.07.2011 and Memo: No.15581/E-II, dated 08.07.2011, Copies enclosed.
5. Asstt: Secret Region Office, Kohat

(M.MASOOD KHAN AFRIDI)PSP
Dy: Inspector General of Police,
ohat Region, Kohat.

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ORDER

In Pursuance of Worthy Provincial Police Officer, Khyber Pakhtunkhwa Peshawar Memo: No. 2359-65/Legal dated 06.08.2013 and Dy: Inspector General of Police, Kohat Region Kohat Endst: No.6013-15/EC, dated 12.08.2013, the following Police Officers/Officials of this District Police, who were given out of turn promotions under standing order No.06/2008 are hereby demoted to their substantive rank of Constables with immediate effect.

1. Head Constable Nek Muhammad No.253
2. Head Constable Sar Muhammad No. 539
3. Head Constable Qasim Mehmood No.656
4. Head Constable Afsar Ali No.6
5. Head Constable Noor Shehzad No.440

O.B No. 620

Dated 13-08 /2013


District Police Officer, Karak

OFFICE OF THE DISTRICT POLICE OFFICER, KARAK

No. 10425 /EC, dated Karak the 13/8 /2013.

Copy of above is submitted to the Dy: Inspector General of Police, Kohat Region Kohat for favour of information w/r to his Office Endst: No.6013-15/EC, dated 12.08.2013 Please.


District Police Officer, Karak

T. C


H (60) Annex H
The Provincial Police Officer
Khyber Pakhtunkhwa, Peshawar

Through:

PROPER CHANNEL

Subject:

REPRESENTATION

Respected Sir,

With due respect and humble submission, appellant submits representation based on the following facts and grounds:

FACTS

1. That appellant is serving as constable No. 440 District Karak under your kind control and command.
2. That appellant was approved for promotion to the rank of Head constable on ad-hoc basis by a high committee constituted at CPO for consideration of promotions of Police officers within the meaning of standing order No. 06/2008.
3. That pursuance of the decision made during meeting of the committee worthy Provincial Police Officer conveyed those recommendations to your office vide memo: No. 15512/E-II dated 07/07/2011.
4. That acting upon the recommendations of the committee, your good office issued promotion order of appellant to the rank of Head Constable on adhoc basis within the meaning of standing order No. 06/2008 vide order No. 6159-62/EC dated 13.07.2011.
5. That appellant was demoted to the rank of constable vide order of District Police Officer, Karak bearing OB No.

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620 dated 13.08.2013. Hence the present representation is submitted on the following grounds.

GROUNDS

- a. That the impugned order of demotion of appellant has been issued in haphazard manner. The impugned order is non-speaking as no reasons and grounds have been mentioned behind the abrupt demotion in rank of Constable of appellant. Therefore, the impugned order is not sustainable under the law and rules.
- b. That the only reference of out of turn promotion given in the impugned order is also not tenable. The authority has misunderstood the concept of out of turn promotion, a civil servant becomes senior to his colleagues and badge mates while adhoc promotion does not confer such right on civil servant. Again the promotion of appellant was made purely on adhoc basis within the meaning of standing order No. 06/2008 and it has specifically been provided in standing order A/06/2008 that the officer on promotion will retain his old seniority bearing standing order No. 06/2008.
- c. That the references of your good office and that of worthy Provincial Police Officer office given in the impugned order have reportedly been based on the judgment of supreme court vide which out of turn promotion have been declared illegal. Admittedly the honorable Supreme Court has declared out of turn promotion is illegal but not adhoc promotions.

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d.

That appellant retained the promotion for long period and the impugned demotion order was issued with out providing chance of hearing and defense to appellant. Law and rules does not allow adverse decision at the back of a civil servant.

c.

That appellant was promoted to the rank of head constable on adhoc bases in the year 2011 and no one has challenged the promotion order because it was adhoc promotion and it did not disturb and effect the seniority of colleagues and badgemates. Therefore promotion of appellant has wrongly been held out of turn promotion in the impugned order.

It is therefore requested that the impugned order may be set aside and promotion of appellant in the rank of Head constable may be restored with all back benefits.

Yours truly,

Noor Shahzad
(NOOR SHAHZAD)
Constable No.440
District Karak

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Sd/-
Farooq Chaudhary
Judicial

6-10-11
03-09-13

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گزشتہ حصہ ہم سائلوں قبل ازین سے آئے۔
 بیڈنگ سائلوں اچھی کارکردگی کی بنا پر افسران بلا صاحبان نے
 ترقی دے دی۔ آپ ہم سائلوں کو (OUT Turn)
 پورٹوں کی بنا پر سائلوں کو ترقی دے دی۔ خلائیہ حد اکثر ان
 کو صاحبان ہاؤسنگ پورٹوں افسران نے بعد آئے۔ بیڈنگ
 ترقی دے دی۔ ان کو صلاحیتوں کے ساتھ سائلوں کو
 ترقی دے دی۔ علاوہ ازین قیادت خان Asi، ظہیر شاہ Asi
 کو بھی اس کے ساتھ ترقی دے دی۔ بلکہ ایشیا اور
 حکام سائلوں کو ترقی دے دی۔

ہم سائلوں کو ترقی دے دی۔ درخواست دینا استدعا کرتے ہیں۔ کہ
 ہمیں بھی ان کے اہل عہدہ بیڈنگ آئے ہر صورت
 حکام سائلوں کو ترقی دے دی۔ عام پیکار case بھی ایشیا اور
 کیا جائے۔ یہ حکام سائلوں کو ترقی دے دی۔ جیسی صورت پیکار
 ہے۔ اس کے مطابق ہمارے ساتھ کارروائی کی جائے
 اس ہمارے ساتھ انصاف ہوگی ہے۔ انصاف کے ساتھ
 ہونا چاہئے۔ سائلوں کو ترقی دے دی۔ ایشیا بلندی کے
 ساتھ رہنے۔
 توارنگہ پورٹ

HC
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 case for consid-
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 ۲۰۱۳
 سائلوں کو ترقی دے دی۔ ۶۵۶ صاحبان
 سائلوں کو ترقی دے دی۔ ۴۹۰
 Sir Parvankat.
 116 DSB-74
 01/11/13
 T.C

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Tele No. 0927-210724
Fax No. 0927-210823

From: The District Police Officer, Karak.

To: The Dy: Inspector General of Police,
Kohat Region Kohat.

No. 31/29 /EC, dated Karak the 31/9 /2013

Subject: REPRESENTATION

Memo:

A representation preferred by Constable Qasim Mehmood No 656 of this District Police, requesting therein for set aside impugned order of demotion vide No.620, dated 13.08.2013, is submitted herewith for onward submission to CPO Peshawar, please.

O/C
[Signature]
District Police Officer, Karak

T.C
[Signature]

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Tele No. 0927-210724
Fax No. 0927-210823

From: The District Police Officer, Karak

To: The Dy: Inspector General of Police,
Kohat Region Kohat

No. 11926 /EC, dated Karak the 3/8 /2013

Subject: REPRESENTATION

Memo:

A representation preferred by Constable Noor Shehzad No 440 of this District Police, requesting therein for set aside impugned order of demotion vide No.620, dated 13.08.2013, is submitted herewith for onward submission to CPO Peshawar, please.

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District Police Officer, Karak

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From:- The Dy. Inspector-General of Police,
Kohat Region, Kohat.

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

No. 1324 / Dated Kohat the 31/01 /2014.

Subject:- **GUIDELINES**

MEMORANDUM.

In pursuance of worthy Provincial Police Officer, Khyber Pakhtunkhwa office letter Nos. 17410-50/E-II dated 22.07.2013 and 2359-65/legal dated 06.08.2013, the District Police Officer, Karak demoted the following officials from the rank of Head constable to their substantive rank of constable as they were given out of turn / adhoc promotion under Standing Order No. 6/2008 vide O.B No. 620 dated 13.08.2013.

- 1 Naik Muhammad No. 253
- 2 Sar Muhammad No. 539
- 3 Qasim Mehmood No. 656
- 4 Afsar Ali No. 6
- 5 Noor Shahzad 440

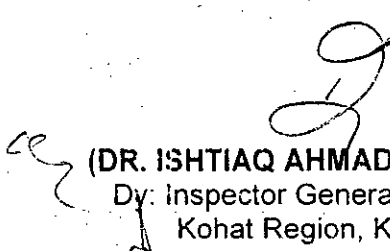
Feeling aggrieved from the said order they filed representations to the undersigned and stated that they were promoted to the rank of Head constable on adhoc basis within meaning of Standing Order No. 6/2008 and the promotion does not fall under the ambit of out of turn promotion. They requested that the order of DPO Karak may be set-a-side.

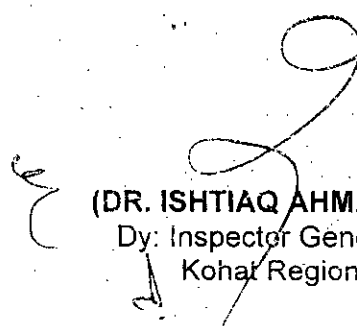
The representations involve a question whether the adhoc promotion comes within meaning of out of turn promotion and covers the directives issued by worthy PPO vide his office above quoted reference. In this regard telephonic conversation was also made with you.

It is therefore, requested that this office may please be guided whether the adhoc promotion falls under the ambit of out of turn promotion or not. It may also be guided that the plea of appellants is justified or otherwise. An early response is requested, so that the representation could be disposed of please.

No. 1325 /EC

Copy to the Provincial Police Officer Khyber Pakhtunkhwa w/r to this office Memo. No. 6130/EC dated 16.08.2013, a case out of turn promotion was sent to CPO for necessary action, but no information was passed on to this office regarding disposal / fate of the case.


(DR. ISHTIAQ AHMAD MARWAT)
Dy. Inspector General of Police
Kohat Region, Kohat.


(DR. ISHTIAQ AHMAD MARWAT)
Dy. Inspector General of Police
Kohat Region, Kohat.

آغاز شد حیدر سائیل در خواست است

بازخواستی بپوشید صرف خدمت پرور سائیل

خواستی بپوشید سه روز از دست بپوشید

بپوشید در خدمت سائیل

از تمام خواست بپوشید

صد در تمام قسم کاروانی بپوشید

بپوشید در تمام کاروانی بپوشید

استیضاح سائیل در تمام

خواستی بپوشید در تمام

کاروانی بپوشید

الطرح

9/12/2013

440 نفر در تمام کاروانی

T.G. for work

Am Rill CPSS/F 9/12/13

Miguel

9/12

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گزارش شد حدیہ ہم سائلین قبل ازین سے آئے۔
 بیڈنگ سائلین اچھی کارکردگی کی بنا پر افسران بالا صاحبان نے
 ترقی دینے سے منع کیا۔ آپ ہم سائلین کو (out turn)
 پروموشن کی بنا پر سائلین سے منع کیا۔ حالانکہ حدیہ انکاران
 کو صاحب ہوا سائلین کو افسران نے بھروسہ کیا ہے۔ بیڈنگ
 ترقی دینے سے منع کیا۔ ان کو صلاح دیا کہ سائلین
 سے منع کیا۔ علاوہ ازین قلم شاہ ASI، قلم شاہ ASI
 کو بھی اس سائلین سے منع کیا۔ بلکہ سائلین سے
 سائلین کے لئے ارسال سے منع کیا۔

HC
 forward their
 case for consid-
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ہم سائلین درخواست دینا استدعا کرتے ہیں کہ
 ہمیں بھی ان کے اہل حدیہ بیڈنگ سے ہر صورت
 نظر رکھنا سائلین کے حاکم ہمارا case بھی سائلین سے
 نہ جائے۔ بقدر سائلین کے جیسی صورت آئی
 گئی۔ اس کے مطابق ہمارا ساتھ کارروائی کی جائے
 اس ہمارا ساتھ انصاف ہوگی ہے۔ انصاف کے تقاضا
 پر کیا جائے گا۔ سائلین آپ کے اقبال سائلین کے
 دعاؤں سے رہے۔
 نوٹ: سائلین سے منع کیا۔

11/11/2013
 656 صاحبزادہ
 Sir Parwahaat. 440
 11/11/13
 T.C

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

Through: PROPER CHANNEL

Subject: REPRESENTATION

Respected Sir,

With due respect and humble submission, appellant submits representation based on the following facts and grounds.

FACTS

1. That appellant is serving as constable No. 440 District Karak under your kind control and command.
2. That appellant was approved for promotion to the rank of Head constable on ad-hoc basis by a high committee constituted at CPO for consideration of promotions of Police officers within the meaning of standing order No. 06/2008.
3. That pursuance of the decision made during meeting of the committee worthy Provincial Police Officer conveyed those recommendations to your office vide memo: No. 15512/E-II dated 07.07.2011.
4. That acting upon the recommendations of the committee, your good office issued promotion order of appellant to the rank of Head Constable on adhoc basis within the meaning of standing order No. 06/2008 vide order No. 6159-62/EC dated 13.07.2011.
5. That appellant was demoted to the rank of constable vide order of District Police Officer, Karak bearing OB No.

T.S.
[Signature]

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620 dated 13.08.2013. Hence the present representation is submitted on the following grounds.

GROUNDS

- a. That the impugned order of demotion of appellant has been issued in haphazard manner. The impugned order is non-speaking as no reasons and grounds have been mentioned behind the abrupt demotion in rank of Constable of appellant. Therefore, the impugned order is not sustainable under the law and rules.
- b. That the only reference of out of turn promotion given in the impugned order is also not tenable. The authority has misunderstood the concept of out of turn promotion, a civil servant becomes senior to his colleagues and badge mates while adhoc promotion does not confer such right on civil servant. Again the promotion of appellant was made purely on adhoc basis within the meaning of standing order No. 06/2008 and it has specifically been provided in standing order A/06/2008 that the officer on promotion will retain his old seniority bearing standing order No. 06/2008.
- c. That the references of your good office and that of worthy Provincial Police Officer office given in the impugned order have reportedly been based on the judgment of supreme court vide which out of turn promotion have been declared illegal. Admittedly the honorable Supreme Court has declared out of turn promotion is illegal but not adhoc promotions.

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That appellant retained the promotion for long period and the impugned demotion order was issued with out providing chance of hearing and defense to appellant. Law and rules does not allow adverse decision at the back of a civil servant.

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That appellant was promoted to the rank of head constable on adhoc bases in the year 2011 and no one has challenged the promotion order because it was adhoc promotion and it did not disturb and effect the seniority of colleagues and badgemates. Therefore, promotion of appellant has wrongly been held out of turn promotion in the impugned order.

It is therefore requested that the impugned order may be set aside and promotion of appellant in the rank of Head constable may be restored with all back benefits.

Yours truly,

(NOOR SHAHZAD)
Constable No.440
District Karak

6-8-2013

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

Through: PROPER CHANNEL

Subject: REPRESENTATION

Respected Sir,

With due respect and humble submission, appellant submits representation based on the following facts and grounds.

FACTS

1. That appellant is serving as constable No. 440 District Karak under your kind control and command.
2. That appellant was approved for promotion to the rank of Head constable on ad-hoc basis by a high committee constituted at CPO for consideration of promotions of Police officers within the meaning of standing order No. 06/2008.
3. That pursuance of the decision made during meeting of the committee worthy Provincial Police Officer conveyed those recommendations to your office vide memo: No. 15512/E-II dated 07.07.2011.
4. That acting upon the recommendations of the committee, your good office issued promotion order of appellant to the rank of Head Constable on adhoc basis within the meaning of standing order No. 06/2008 vide order No. 6159-62/EC dated 13.07.2011.
5. That appellant was demoted to the rank of constable vide order of District Police Officer, Karak bearing OB No.

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620 dated 13.08.2013. Hence the present representation is submitted on the following grounds.

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GROUNDS

a. That the impugned order of demotion of appellant has been issued in haphazard manner. The impugned order is non-specking as no reasons and grounds have been mentioned behind the abrupt demotion in rank of Constable of appellant. Therefore, the impugned order is not sustainable under the law and rules.

b. That the only reference of out of turn promotion given in the impugned order is also not tenable. The authority has misunderstood the concept of out of turn promotion, a civil servant becomes senior to his colleagues and badge mates while adhoc promotion does not confer such right on civil servant. Again the promotion of appellant was made purely on adhoc basis within the meaning of standing order No. 06/2008 and it has specifically been provided in standing order A/06/2008 that the officer on promotion will retain his old seniority bearing standing order No. 06/2008.

c. That the references of your good office and that of worthy Provincial Police Officer office given in the impugned order have reportedly been based on the judgment of supreme court vide which out of turn promotion have been declared illegal. Admittedly the honorable Supreme Court has declared out of turn promotion is illegal but not adhoc promotions.

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d. That appellant retained the promotion for long period and the impugned demotion order was issued with out providing chance of hearing and defense to appellant. Law and rules does not allow adverse decision at the back of a civil servant.

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e. That appellant was promoted to the rank of head constable on adhoc bases in the year 2011 and no one has challenged the promotion order because it was adhoc promotion and it did not disturb and effect the seniority of colleagues and badgemates. Therefore, promotion of appellant has wrongly been held out of turn promotion in the impugned order.

It is therefore requested that the impugned order may be set aside and promotion of appellant in the rank of Head constable may be restored with all back benefits.

Yours truly,

(NOOR SHAHZAD)
Constable No.440
District Karak

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