

04.09.2018. Learned counsel for the appellant and Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present. Arguments heard and record perused

Vide our detailed judgment of today consisting of four pages placed in connected Service Appeal No. 725/2015 "titled Noor Shahzad Versus Provincial Police Officer Khyber Pakhtunkhwa Peshawar and four others, we do not find any merit in the appeal therefore, the appeal is dismissed with no order as to cost. File be consigned to the record room.

ANNOUNCED

04.09.2018



(MUHAMMAD HAMID MUGHAL)  
MEMBER



(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

23.01.2018

Clerk of the counsel for appellant present. Mr. Zia Ullah, DDA for the respondents present. Counsel for the appellant is not in attendance due to general strike of the bar. To come up for arguments on 27.03.2018 before D.B.


  
Member

  
Chairman

27.03.2018

Appellant with counsel and Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 11.05.2018 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

11.05.2018

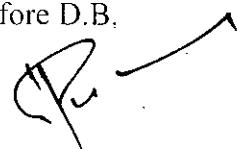
Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for the same on 12.07.2018.

  
Reader

12.07.2018

Clerk to counsel for the appellant present. Mr. Sardar Shoukat Hayat, Addl: AG for respondents present. Arguments could not be heard due to general strike of the Bar. Adjourned. To come up for Arguments on 04.09.2018 before D.B.

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member


22.03.2017

Clerk to counsel for the appellant and Addl. AG for respondents present. Arguments could not be heard due to incomplete bench. Adjourned. To come up for rejoinder and arguments on 25.07.2017 before D.B.

  
(AHMAD HASSAN)  
MEMBER

12. 25.07.2017

Counsel for the appellant and Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Counsel for the appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 20.11.2017 before D.B.

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

20.11.2017 Clerk to counsel for the appellant present. Mr. Zia Ullah, Deputy District Attorney for the respondents present. Clerk to counsel for the appellant submitted rejoinder which is placed on file and requested for adjournment. Adjourned. To come up for arguments on 23.01.2018 before D.B.

  
(Gul Zeb Khan)  
MEMBER

  
(MUHAMMAD HAMID MUGHAL)  
MEMBER

09.06.2016

Clerk to counsel for the appellant and Addl: AG for respondents present. Written reply by respondents not submitted despite extension of last opportunity subject to payment of cost of Rs. 1000/-. Request for adjournment was further made on behalf of learned Addl: AG. Last opportunity is further extended. To come up for written reply/comments and cost of Rs. 1000/- on 22.08.2016 before S.B.



MEMBER

22.08.2016

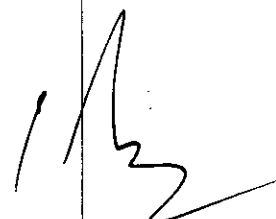
Counsel for the appellant and Mr. Farmanullah, ASI alongwith Additional AG for respondents present. Written reply on behalf of respondents submitted. Cost of Rs. 1000/- also paid and receipt thereof obtained from learned counsel for the appellant. The appeal is assigned to D.B for rejoinder and final hearing for 10.11.2016.



Chairman

10.11.2016

Clerk to counsel for the appellant and Mr. Zain-Ul-Abadeen, H.C alongwith Mr. Usman Ghani, Sr.GP for respondents present. Clerk to counsel for the appellant requested for time to file rejoinder. To come up for rejoinder and arguments on 22.03.2017.



(MUHAMMAD AAMIR NAZIR)  
MEMBER



(PIR BAKHSH SHAH)  
MEMBER


22.12.2015

Counsel for the appellant and Assistant AG for respondents present. Requested for adjournment. To come up for written reply/comments on 29.2.2016 before S.B.

  
Chairman

29.02.2016

None present for appellant. Mr. Habib Khan, ASI alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 26.4.2016 before S.B.

  
Member

26.4.2016

Counsel for the appellant and Muhammad Tariq Usman, SI legal alongwith Addl: A.G for respondents present. Written reply not submitted despite last opportunities. Requested for further adjournment. Last opportunity further extended subject to payment of cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost on 9.6.2016 before S.B.

  
Chairman



02.07.2015

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was serving as Constable and keeping in view his excellent performance and record he was promoted to the post of Head Constable but vide impugned order dated 13.8.2015 the said promotion order was unilaterally withdrawn regarding <sup>which</sup> the preferred departmental appeal on 3.9.2013 which was not responded where-after appellant preferred Writ Petition No. 919/2014 which was sent to this Court for adjudication and which was registered as appeal No. 423/2015. That the instant appeal is preferred in proper format as permitted by this Tribunal in the afore-stated appeal vide order dated 12.6.2015.

Appellant Deposited  
Security & Process Fee



That the impugned order of demotion dated 13.8.2013 was passed without affording any opportunity of hearing to the appellant and, moreover, the same is against facts and law.

Point urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 15.10.2015 before S.B.

  
Chairman

15.10.2015



Since 15.10.2015 has been declared as public holiday on account of 1<sup>st</sup> Muharram-ul-Haram, therefore, case is adjourned to ~~29-12-15~~ for the same.

  
Reader

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 727/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	29.06.2015	<p>The appeal of Mr. Qasim Mehmood resubmitted today by Mr. Muhammad Arif Jan Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	30-6-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>2-7-2015</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Qasim Mehmood Head Constable No. 656 Kohat received to-day i.e. on 26.06.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of departmental appeal is not attached with the appeal which may be placed on it.

No. 1012 /S.T,

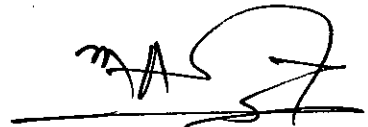
Dt. 29/6 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. M. Arif Jan Adv. Pesh.

Respected Sir,

Re-submitted, that yes the departmental appeal of the appellant is not attached as missing but the attached document, on page-30 of the file speaks the submission of the departmental appeal. Hence the appeal may graciously be placed before the Honble Bench.

  
28/6/15



**BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA PESHAWAR**

Service Appeal No.....727...../2015

Head Constable ..Qasim Mehmood.....Appellant

**VERSUS**

Provincial Police Officer & others..... Respondents

**APPLICATION FOR CHANGING THE FORMAT OF THE ABOVE  
TITLED APPEAL FROM THE FORMAT OF WRIT PETITION**

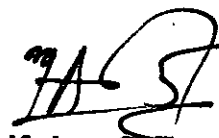
Respectfully Sheweth,

1. That the above titled appeal is pending adjudication before this Hobbles tribunal and is fixed for , 2 July, 2015
2. That on the last date of hear<sup>ing</sup>, the counsel for the appellant requested for the changing of the format of the above titled appeal from the writ petition which was allowed hence the modified and changed format of the appeal along with copies is attached for further proceedings.

It is therefore humbly requested that the instant modified/ changed format may be treated and consider as the appeal of the appellant for further proceedings

Through

Appellant



M Arif Jan & Fazal mabood

Advocates Peshawar



BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA PESHAWAR

Service Appeal No.....727...../2015

Head Constable ..Qasim Mehmood.....Appellant

VERSUS

Provincial Police Officer & others..... Respondents

INDEX

S.No	Description of Documents	Annex	Pages
1.	Grounds of service appeal		1-4
2.	Affidavit		5
3.	Addresses of parties		6
4.	Copies of details of certificates etc	A	7-28
5.	Copy of impugned order dt 13-8-2013	B	29
6.	Copy of departmental appeal <i>Acknowledgment is attached</i>	<del>C</del> ✓	30
7.	Copy of letter dated 31-1-2014	D	31
7.	Wakalatnama <i>Already place on file</i>		

Appellant

Through

Muhammad Arif Jan

Advocate Peshawar

BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA PESHAWAR

P.W.P. Province  
Service Tribunal

Service Appeal No... 727...2015

Diary No 749  
26-6-2015

Head Constable Qasim Mehmood No.656, Kohat Region Police  
Department.....Appellant

VERSUS

1. Provincial Police Officer Khyber Pakhtunkhwa 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 Karak.

..... Respondents

**APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED  
13.08.2013 PASSED BY RESPONDENT NO.5 WHEREBY THE  
APPELLANT HAS BEEN DEMOTED TO THE RANK OF CONSTABLE.**

**Prayer in Appeal:**

On acceptance of the instant service appeal, the impugned  
Orders dated 13.08.2013 passed by respondent No.5 may graciously  
be set aside and the appellant may kindly be restored /re-instate on  
their Original position as HC/ASI with all back benefits.

Any other remedy which deems fit by his Hon'ble Tribunal in the  
interest of justice, may also be granted in favor of appellant.

Filed to-day

26/6/15

(2)

Respectfully Sheweth;

1. That the appellant was enlisted in Police Force as Foot Constable and after passing Professional Courses, was promoted as Head Constable.
2. That the appellant performed his duties to the entire satisfaction of his superiors and there is/was no complaint or inquiry pending against him.
3. That the appellant established their outstanding performances, bravery beyond the call of their duties and therefore made in every special campaign against terrorist, Pos, Gamblers, kidnapping and anti Social elements including the person involved in the business of illicit arms ammunition, narcotics etc and was therefore, award with special commendations certificates, medals and prizes. (the details has been Annexed as A)
4. That the 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-6/2008 and by acting upon the recommendations of the committee the appellant was promoted to the rank of Head Constable on ad-hoc basis.
5. That the appellant was demoted to the rank of constable Vide order of respondent No-5 bearing No-620 dated 13-8-2013 in haphazard manner. (Copy of Demotion order dated 13-8-2013 is attached as Annex-B).
6. That the appellant being aggrieved filed a departmental representation on 03.09.2013 which is **annex-C** before the

3

*acknowledgment*

respondent No.1 which was still pending.(Copy of departmental Appeal is Annexed as C).

7. That the appellant is being aggrieved from the impugned order, hence the instant appeal on the following amongst other grounds ;

**GROUNDS**

- A. That the acts, commissions and omissions of respondent No.5 (hereinafter impugned) are patently illegal, un-lawful, without lawful authority, of no legal effect hence having no value in the eyes of law thus be set aside and the appellant may be restored/reinstated in his original position with all back benefits.
- B. That the other officers/ officials who were promoted on the strength of the order No-6/2008 are not been disturbed except the appellant which is totally discrimination and this act of the respondents are clear violation of the laid down rules and regulations.
- C. That the respondents and particularly respondent No-2 is also not clear about the impugned order and in this respect he asked guideline from the high ups hence the appellant deserve to enjoy the facilities provided under order No-6/2008.(Copy of letter dated 31-1-2014 is attached as Annex-D).
- D. That the appellant are promoted on ad-hoc bases not out of turn due to the reason of his outstanding performance hence the impugned order has no value in the eyes of law thus be set-a-side.
- E. That if the appellant has not been re-instated to his original position, He will suffer a lot and also be discouragement.

4

F. That no proper departmental enquiry what so ever be conducted in proper manner against the appellant, moreover the respondent No.5 badly failed to follow the existing policies, rules and regulations.

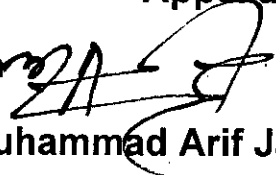
It is therefore most humbly prayed that on acceptance of the instant service appeal, the impugned Orders dated 13.08.2013 passed by respondent No.5 may graciously be set aside and the appellant may kindly be restored /re-instate on his Original position as HC/ASI with all back benefits.

Any other remedy which deems fit by his Hon'ble Tribunal in the interest of justice, may also be granted in fever of appellant.



Appellant

Through



Muhammad Arif Jan

Advocate Peshawar

5

**BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA PESHAWAR**

Service Appeal No...../2015

Head Constable Qasim Mehmood ..... **Appellant**

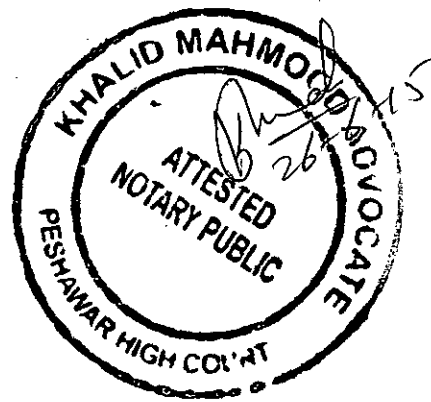
**VERSUS**

Provincial Police Officer and Others..... **Respondents**

**AFFIDAVIT**

I Head Constable Qasim Mehmood No.656, Kohat Region do hereby solemnly affirm and declares on oath that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

**DEPONENT**



6

**BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA PESHAWAR**

Service Appeal No...../2015

Head Constable Qasim Mehmood ..... **Appellant**

**VERSUS**

Provincial Police Officer and Others..... **Respondents**

**ADDRESSES OF PARTIES**

**APPELLANT**

Head Constable Qasim Mehmood No.656,Kohat RegionPolice Department.

**RESPONDENTS**

1. Provincial Police Officer Khyber Pakhtunkhwa 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 Karak.

Through

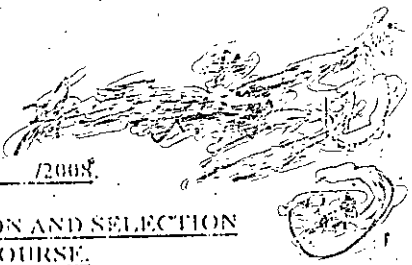
**Appellant**

**M Arif Jan & Fazal mabood**

**Advocates Peshawar**



7



Amir "A"

STANDING ORDER NO. 65 /2008

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.

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.

- 5362-8
- No. 11-6-08
- 1. All S/Os
- 2. DSO. Investigation
- 3. Insp. Ev. Log.
- 4. All S/Os
- 5. Misc. Aff.
- 6. OHC/SAC

No. 1282 /327 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.

No. 19/14  
09-6-08

Circulate amongst all  
09/06/08

Submitted for  
approval, HC  
17/06

Attested  
To be true copy  
Advocate

BETTER COPY

**Standing Order No. 6/2008**  
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.

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.

Attested

To be true copy  
Advocate

8



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

To: The District Police Officer, Kohat

No. 8852 / EC. Dated Kohat the 9/10/2009

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:-


II  
CASILSRE

District Police Officer  
Kohat  
9/10/09

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

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.

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

ORDER:-

*Qasim  
Promotion*



9

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 undergoing necessary courses.

O.B No.

*1066*

Dated

*10/10/2009*

*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

No. 128-48/Sports, dated 16/07/2010. in recognition of Extra-Ordinary Acts of Bravery, Devotion and Exemplary Sacrifices of Police Officers and Jawans, the Chief Minister Khyber Pakhtunkhwa has been pleased to confer the award of CM Police Gold Medals for valour on the following:-

*[Handwritten signature]*

RECORDED  
3/60  
2-8-10

*[Handwritten notes on the left margin: "SIRK", "27 No", "P", "POLICE", "AT", "copy", "SRE", "laetion", "18/200"]*

CHIEF MINISTER'S HOUSE PESHAWAR ON 14/03/2009		DESIGNATION
1	Mr. Muhammad Idrees Khan (Now DIG)	SSP/SP (The then DPO/Hangu)
2	Mr. Faiz ul Mulk Bangash	SSP/Rail Peshawar
3	Mr. Karamat Shah	DSP/Swat
4	Mr. Sarbaland Khan	DSP/Swat
5	Said Nawaz of Tank	Sub-Inspector
6	Gul Bahadar of Katak	Sub-Inspector/PC
7	Qasim Mehmood No. 656 of Karak ✓	Constable
8	Arif Hussain No. 137 of Hangu ✓	Head Constable
9	Munir Ahmad of Hangu ✓	Constable
10	Mushraf No. 117 of Hangu ✓	Constable
11	Baitullah Bakht of Swat	Asst. Sub-Inspector
12	Fazal Subhan of Nowshetra	III
13	Fazal Habib of Nowshetra	Driver Constable
14	Ibrahim No. 18 of Nowshetra	Constable
15	Shahid No. 366 FRP/Nowshetra	Constable
16	Hamid Ullah of FRP/Karak	LHC
17	Rehmat Ali No. 304 of Karak ✓	Constable
18	Anwar Ali No. 287 of Swabi	Constable
19	Mushiq Ahmad of Bannu	Asst. Sub-Inspector
20	Mr. Mohabat Khan	DSP/SB
21	Abdul Haq	Asst. Sub-Inspector of BDS Squad
22	Shahir Ahmad of District Charsadda	Constable
23	Mr. Dilawar Bangash (Now SP)	DSP (DPO/Swat)
24	Afzal Khan (Shaheed) Peshawar	Sub-inspector
25	Faqir Shah (Shaheed) Peshawar	Asst. Sub-Inspector
26	Ghaffoor Khan No. 545 (Shaheed) Peshawar	Constable
27	Khan Bahadar No. 4483 (Shaheed) Peshawar	Constable
28	Saifullah of Peshawar Police (Shaheed)	Constable/Driver
29	Mohammad Farooq of District Swat (Shaheed)	Sub-Inspector
30	Fahim Abbas (Shaheed) FRP DI Khan	Constable
DISTRICT SWAT		DESIGNATION
1.	Mr. Danishwar Khan	SSP/DPO Swat
2.	Mr. Khushal Khan	DCO/Swat
3.	Qazi Ghulam Farooq	Addl. SP/Swat
4.	Mr. Rauf Khan	Addl. SP/Upper Swat
5.	Mr. Khaista Rehman Khan	DSP Ghuligay Swat
6.	Mr. Amjad Ali Khan	Inspector PSO to DIG/MKD
7.	Mr. Arman Ullah Khan	RI Police Lines Swat
8.	Mr. Habib ur Rehman	Line Officer Swat
9.	Mr. Ghulam Muhammad Khan	Inspector SHO Saidu Sharif Swat
10.	Mr. Yousaf Ali Khan	Inspector SHO Khwaza Khela Swat
11.	Mr. Gul Noor Khan	Inspector SHO Matta Swat
12.	Mr. Hussain Badshah	Inspector SHO Rahim Abad Swat
13.	Mr. Jigar Khan	SI SHO Mingora Swat
14.	Syed Amjad Ali	SI SHO Ghuligay Swat
15.	Mr. Saif ur Rehman Khan	SI SHO Kabbal Swat
16.	Mian Saif Wahid	SI SHO Madyan Swat
17.	Mr. Munir Khan	SI P. Kokrai Swat
18.	Mr. Nayat Ullah	ASI PS Mingora Swat
19.	Mr. Jigar Khan	ASI Investigation PS Kabbal Swat
20.	Mr. Fazl-e-Karim	Subdar Malakand Levies
21.	Mr. Noor Islam	SP/DPO Karak
22.	Mr. Nisar Khan Tanoli (at Peshawar)	

(979)

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 Iqbal Khan	Inspector SHO Cantt. Bannu
5.	Mr. Jamshid Ali Shah No. 782	HC PS Cantt. Bannu
6.	Mr. Nifatullah 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 Nowshetra
6.	Mr. Riaz Khan	SP/Investigation Charsadda
7.	Mr. Farid Hussain Bangash	DSP/Rural Mardan (Martyred)
8.	Mr. Pir Shahab Ali Shah	DSP Shahqudar
9.	Mr. Fazal Hussian	Inspector (Martyred)
10.	Mr. Shah Mehtaz Khan	Inspector
11.	Mr. Saleem Dad Khan	Inspector
12.	Mr. Mazhar Shah	Sub-Inspector
13.	Mr. Amjad Khan	Sub-Inspector (Martyred)
14.	Mr. Sher Ullah Khan	Sub-Inspector
15.	Mr. Abid ur Rehman	Sub-Inspector
DISTRICT PESHAWAR		
1.	Mr. Bahdar Khan (Shaheed)	DSP Charsadda
2.	Mr. Shahnawaz Khan	DSP Charsadda
3.	Mr. Jehangir 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/Foaji Missal accordingly with reference to the Standing Order No. 8/08 "Chief Minister Medals for Valour 2008"

*(Signature)*  
 (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.



N.W.F.P POLICE

COMMENDATION CERTIFICATE-III

Granted by MR. NISAR AHMAD KHAN

District Police Office Nowshera.

Granted to HC QASIM MEHMOOD NO. 656. Son of \_\_\_\_\_

Resident of \_\_\_\_\_ Police Station KALAN. District NOWSHERA.

- recognition of FIR NO.1243, date 17.11.09, u/s 9CNSA, IS KALAN. FIR NO. 1247/09, UIS 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

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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.

*CASH Reward of Rs. 1000/-*

O.B. No. 1956

Dated 12.11.09.

District Police Officer,  
Nowshera

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

13



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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-Exc act  
PS Akora Kattak.  
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

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

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

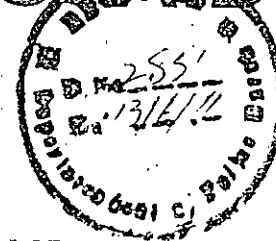
23. Health certificate



TRANSPARENCY  
INTERNATIONAL-PAKISTAN



USAID



**DIRECTORATE OF ANTI-CORRUPTION ESTABLISHMENT,  
KHYBER PAKHTUNKHWA**

*Certificate of Participation*

*C/S/ISRC*  
*[Signature]*

*2/1/11/15/11*

Mr./Ms QASEEM <sup>M</sup> AST 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

*[Signature]*  
**Nisay Ahmad Khan**  
Director,  
Anti-Corruption Establishment,  
Khyber Pakhtunkhwa





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*

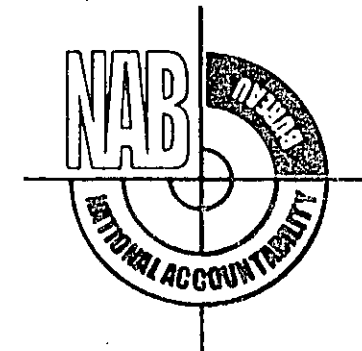


Mr/Ms QASIM KHAN ASI/ACE, KPK

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

**NISAR AHMAD KHAN**  
**Director**

Anti-Corruption Establishment  
Khyber Pakhtunkhwa



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QASIM/ACE  
*[Signature]*

*[Handwritten signature]*

## سفارشات برائے گورنر میڈل

18

مورخہ 19.07.2008 کو کرک پولیس اور انتہائی خطرناک اور بدنام زمانہ مجرم اشتہاری مسی اصغر خان ولد شاہد خان سکند غول بانڈہ کے مابین دیہہ عیدار بانڈہ (پولیس سٹیشن خرم) میں ایک سخت مقابلہ ہوا۔ پولیس (ہر ذلت حرات مندانه اور قابل ستائش کارکردگی کی وجہ سے اصغر خان ولد کل شاہد خان لقمہ اجل بن گیا۔ اس نزک موقع پر پولیس آفسران نے قابل فخر کارکردگی، دلیری اور پیشہ ورانہ مہارت کا مظاہرہ کیا۔ اس مقابلے میں جن پولیس آفسران 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 دو نعد کا پس منظر درج ذیل بیان ہے۔

اصغر خان ولد شاہد خان ساکن غول بانڈہ تھانہ خرم ضلع کرک پولیس کو سترہ (17) سنگین مقدمات میں مطلوب تھا۔ ان سترہ مقدمات میں قتل، اقدام قتل، بارودی سرنگیں اور تخریبی کاروائی، سرقتہ بالجبر، سرقتہ عام، حرابہ، 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 علانیے کی عوام میں دہشت کی علامت تھا۔ وہ لوگوں سے ناجائز 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 سکند بہادر خیل کی بیٹھک کے ساتھ رات کو دھاکہ کیا۔ جس پر مقدمہ نمائت 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 خیر 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 زینت اللہ ساکن غول بانڈہ کے گھر کے نزدیک دھاکہ خیر 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 سمانا، بینظیر اور مسماہ شازیہ شد پور ڈیڑھی 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 غلام دین سکند دریش خیل کے گھر صدر دروازے کے باہر بارودی سرنگ بچھائی جس کی بنا

**Attested**  
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Advocate

پر مقدمہ علت نمبر آ مورخہ 23.01.2008 بجرم Act: Subs: Exp: 4 تھانہ خرم درج کیا۔ بجرم

امیر خان نے سیف، اللہ سکھ بھادر خیل کو مقدمہ علت نمبر 64 مورخہ 19.07.2005 بجرم PPC

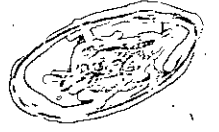
قتل کیا تھا۔ اس طرح مجرم اشتہاری اصغر خان نے رشید نواز ساکن بھادر خیل کے گھر کے صدر دروازے کے باہر بارودی سرنگ بچھائی تھی۔ بارود پھٹ کر زوردار دھماکہ ہوا جس سے مسماۃ زرخندہ بی بی، شمینہ بی بی اور گل صاحبہ خان زخمی ہوئے۔ بعد میں اہل سادہ خان زخموں کی تاب نہ آ کر بان بچن ہوا۔ جس پر مقامی پولیس نے مقدمہ علت نمبر 64 مورخہ 23.01.2008 بجرم Act: Subs: Exp: 302/324 PPC، 3/4 تھانہ خرم درج کی۔ مورخہ 21.05.2008 کی رات کو مجرم اشتہاری اصغر خان نے شیخ سعدی سکھ بھادر خیل کے گھر میں بذاتِ اپنے ہاتھ بنانہ کار تکاب کیا۔ وہ بد فعلی کرنے کا ارادہ رکھتا تھا۔ انکار پر اس نے مسماۃ ملتان بی بی اور مسماۃ 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 کرک پولیس مسلسل بجرم اشتہاری اصغر خان کے گرفتاری کی تنگ و دو کرتی رہی۔ اس کے مشلوک بود و باش بر لا لبتا ادا چھاپے لگائے گئے۔ مگر کامیابی نصیب نہ ہوئی۔

بجرم اشتہاری اصغر خان علاقہ میں دہشت کے علامت تھا۔ اور اس نے پورے علاقے میں خوف و ہراس پھیلایا ہوا تھا۔ بجرم اشتہاری اصغر خان کی گرفتاری پولیس کیلئے ایک چیلنج کی حیثیت رکھتی تھی۔ اس بناء پر زیر دستخطی نے اس ناسور کی گرفتاری کیلئے در شکت عملی تیاری کی۔ مورخہ 19 جولائی 2008 کو مجرم اشتہاری اصغر خان کے دہریہ عیدار بائندہ کے پر بازی علاقوں میں موجودگی کی اطلاع بذریعہ خبر ان موصول ہوئی جن کو اس مقصد کیلئے خصوصی ٹانک حوالہ کیا گیا تھا۔ زیر دستخطی کو اطلاع موصول ہوتے ہی موقع پر روانہ ہوئے۔ اور زرد کی تھانوں کو موقع پر پہنچنے کی ہدایت جاری کر دی۔ تھانہ خرم کو پیش پولیس اور س 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 وارانہ مہارت کے ساتھ ترتیب دی۔ گوکہ یہ علاقہ جہاں بجرم اشتہاری موجود تھا پولیس اپریشن کیلئے نہایت دشوار اور کٹھن تھا۔ مگر پولیس نے بجرم اشتہاری کی پناہ گاہ کو ناسرہ میں لے لیا۔ بجرم اشتہاری نے بھاگ نکلنے کی کوشش کی۔ مگر پولیس کی منظم و منظم حصرہ کو دیکھ کر اس نے ایک غار میں پناہ لی۔ وہ غار جسمیں خود کار ہتھیار اور بینڈ گرنیڈ سے لیس بجرم اشتہاری مورچہ زن تھا پولیس پارٹی کیلئے اس کو وہاں زیر 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 کا بندر گل بھادر اور کانسٹیبل قائم محمود نے جان کی بازی لگا کر بجرم اشتہاری کو ہدف بنانے کیلئے آگے بڑھنے کا عزم کیا۔ بجرم اشتہاری کو پہاڑی غار میں بے دخل کرنا نہایت مشکل کام تھا۔ مذکورہ بالا پولیس آفسران زیر دستخطی کی ہدایات عمل کرتے ہوئے اور رینگتے ہوئے دفع پہنچ گئے۔ زیر دستخطی بلا واسطہ اسی عمل کی نگرانی کر رہے تھے۔ پولیس آفسران نے جرات اور

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Advocate



پیشہ وراثت مہارت کا مظاہرہ کرتے ہوئے اس خولہ ناک ملازم کو نشانہ بنایا۔ یہ مقابلہ 3 گھنٹے جاری رہا۔ مجرم اشتہاری نے آگے بڑھنے والے پولیس آفسران پر گرنیڈ سے حملہ کیا۔ لیکن انہوں نے ہمت نہ ہاری۔ اور مجرم اشتہاری کو ٹھکراتے ہوئے اس میں کامیاب ہوئے۔ پولیس آفسران نے اپنے جانوں کی پرواہ کئے بغیر مقابلہ کیا اور کرک پولیس کی تاریخ میں ایک میاں باب قائم کیا۔ مجرم اشتہاری کی قبضہ سے تلاش کو ف، 3 ہینڈ گرنیڈ، 2 موبائل فون، 3 سیم اور نقد رقم مبلغ 18،160 روپے برآمد کئے۔ پولیس نفری اور نیشنل پولیس فورس نے بہادری اور شجاعت کا مظاہرہ کیا اور مجرم اشتہاری کو کبھی فریاد تک پہنچایا۔ کرک کی عوام اور ڈسٹرکٹ ناظم رحمت سلام صاحب، MNA مولانا مفتی اجمل صاحب مقامی ایم پی ایز اور ناظمین نے پولیس کی کارکردگی کو منظر استحسان دیکھا۔

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

1۔ پلاٹون کمانڈر گل بہادر۔

2۔ کانسٹیبل قاسم محمد نمبر 656۔

نثار احمد خان

ڈسٹرکٹ پولیس آفیسر کرک

Attested  
To be true copy  
Advocate

NORTH WEST FRONTIER PROVINCE

CHIEF MINISTER'S MEDAL FOR VALOUR

Granted by Mr. Amir Haider Khan Hoti

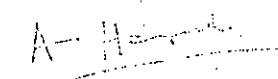
Chief Minister NWFP

TO

Conductable Qasim Mehmood No. 656

In Recognition of His Bravery & Valour

Dated: 14/03/2009

  
Chief Minister

4



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19/5

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 Ghoul 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 19<sup>th</sup> 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.

Attested  
To be true copy  
Advocate

Next  
Page

27

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

*[Handwritten mark]*

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

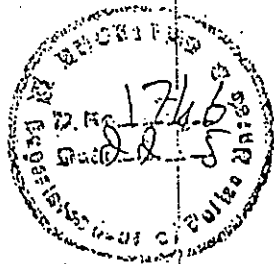
No 4119 /EC

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

*[Handwritten signature]*

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

*SJC*  
*for inspection*



District Police Officer  
Karak

*[Handwritten signature]*  
22/5

**Attested**  
*[Handwritten signature]*  
**To be true copy**  
**Advocate**

*[Handwritten signature]*

BETTER COPY

From : The Provincial Police Officer,  
NWFP Peshawar.

*[Circular stamp]*

*[Circular stamp]*

*[Circular stamp with number 28]*

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**  
*[Signature]*  
To be true copy  
Advocate.

(ABDUL MAJEED KHAN MARWAT)

PSP

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

29



Annex "B"

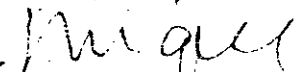
ORDER

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. 12425 /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

30



Annex 'C'

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. \_\_\_\_\_ /EC, dated Karak the 31/8 /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

District Police Officer, Karak

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 Aii 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.

(DR. ISHTIAQ AHMAD MARWAT)

Dy: Inspector General of Police  
Kohat Region, Kohat.

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.

22









**BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR**

Appeal No. 777/2015

Qasim Mehmood Head Constable ..... (Appellant)

Versus

1. The Provincial Police Officer, Khyber Pakhtunkhwa.
2. The Regional Police Officer, Kohat Region, Kohat.
3. The District Police Officer, Kohat.
4. The District Police Officer Karak.
5. The District Police Officer, Hangu..... (Respondents)

Subject: - REPLY ON BEHALF OF RESPONDENTS

**Preliminary objections**

1. The appeal is got no locus standi.
2. The appellant has got no cause of action to file the present appeal.
3. The appeal is time barred.
4. The appeal is not maintainable in the present form.
5. The appeal is bad for not suing the necessary pa.

**FACTS**


1. Correct, to the extent that appellant was enlisted in Police force as Foot Constable and was promoted as Head Constable on adhoc basis promotion within the meaning of standing Order No. 6/2008.
2. Correct, appellant being member of police force are under statutory obligation to perform his duties diligently.
3. Correct, the appellant perform his duties in professional manner and he was accordingly rewarded for good work and appellant have admitted grant of reward.
4. Correct to the extent that appellant was promoted to the rank of Head Constable on adhoc basis within the meaning of standing order No. 6/2008 which provides quick promotion on the police officer who exhibit courage and bravery during duties. ( Copy of standing Order enclosed as **Annexure-A**
5. Correct, appellant was demoted to the rank of Constable by respondent No. 5 vide OB No. 620 dated 13.08.2013 because the honorable Supreme Court of Pakistan declared out of turn promotion unsatisfactory and respondent No. 1 circulated the directions of the honorable Court vide letter No. 17410-50/E-II dated 22.07.2013. Copy of which is enclosed as **Annexure-B**. Compliance with the above directions respondent No. 2 issued demotion order of the appellant. Copy of which is enclosed as **Annexure -C**

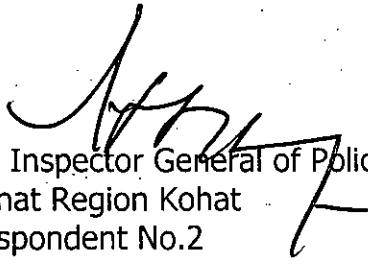
6. Correct, to the extent that the appellant filed departmental appeal to respondent No. 2 against the demotion order of respondent No. 5. However respondent No. 2 asked for gridline from respondent No. 1 vide letter No. 6744/EC, so that promotion cases could be finalized. Copy of which is enclosed a **Annexure-D**.

**GROUND**s Following are the main grounds.


- A. Incorrect, appellant was treated in accordance with law and rules. He was demoted in the light of directions received from the honorable Supreme Court of Pakistan.
- B. Incorrect, each case is decided on its own facts.
- C. Incorrect, appellant filed a departmental to the respondent No. 2 and the same is pending before respondent No. 1.
- D. Incorrect, appellant was promoted on the basis of standing order No. 6/2008 but the same was declared unconstitutional by Supreme Court of Pakistan in his judgment vide criminal original petition No. 89/2011.
- E. Incorrect, needs no comments.
- F. Incorrect, appellant was demoted by respondent No. 5 after fulfilling all the codal and procedural formalities.

In the light of the above submission, the appeal of appellant may kindly be dismissed.

  
Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.  
Respondent No. 1

  
Deputy Inspector General of Police  
Kohat Region Kohat  
Respondent No.2

  
District Police Officer Kohat  
Respondent No. 3

  
District Police Officer Karak  
Respondent No. 4

  
District Police Officer Hangu  
Respondent No.5

**BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR**

Appeal No. 727/2015

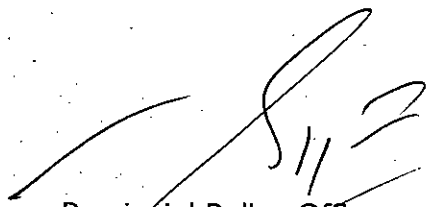
Qasim Mehmood Head Constable ..... (Appellant)

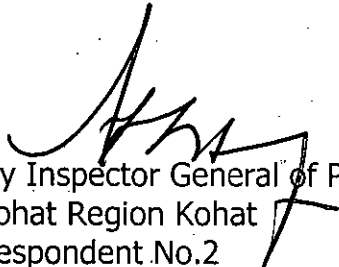
Versus

1. The Provincial Police Officer, Khyber Pakhtunkhwa.
2. The Regional Police Officer, Kohat Region, Kohat.
3. The District Police Officer, Kohat.
4. The District Police Officer Karak.
5. The District Police Officer, Hangu..... (Respondents)

Subject: **AUTHORITY**

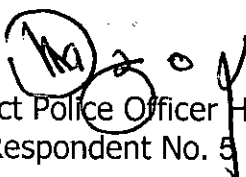
We the respondents do hereby authorize Mr. Muhammad Tariq Usman SI Legal District Karak to represent us in the above cited service appeal. He is also authorized to submit comments etc on our behalf before the Service Tribunal Khyber Pakhtunkhwa, Peshawar.

  
Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.  
Respondent No. 1

  
Deputy Inspector General of Police  
Kohat Region Kohat  
Respondent No.2

  
District Police Officer Kohat  
Respondent No. 3

  
District Police Officer Karak  
Respondent No. 4

  
District Police Officer Hangu  
Respondent No. 5

**BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR**

Appeal No. 727/2015


Qasim Mehmood Head Constable ..... (Appellant)

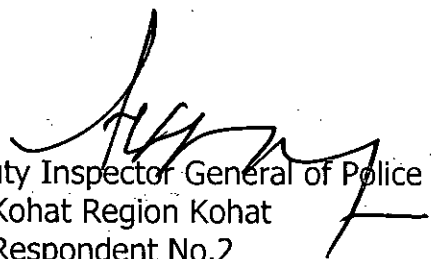
Versus

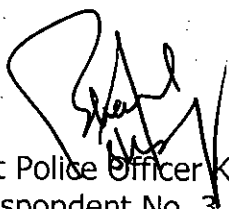
1. The Provincial Police Officer, Khyber Pakhtunkhwa.
2. The Regional Police Officer, Kohat Region, Kohat.
3. The District Police Officer, Kohat.
4. The District Police Officer Karak.
5. The District Police Officer, Hangu..... (Respondents)

Subject: **AFFIDAVIT**

We the respondents do hereby affirm on oath that the contents of comments prepared in response to the above titled service appeal are true and correct to best of our knowledge and belief.

  
Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.  
Respondent No. 1

  
Deputy Inspector General of Police  
Kohat Region Kohat  
Respondent No.2

  
District Police Officer Kohat  
Respondent No. 3

  
District Police Officer Karak  
Respondent No. 4

  
District Police Officer Hangu  
Respondent No. 5

B

(46)  
~~Advocate~~

Annex, 'A' Annex. D

BETTER COPY

D

29

**Standing Order No. 6/2008**  
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.

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.

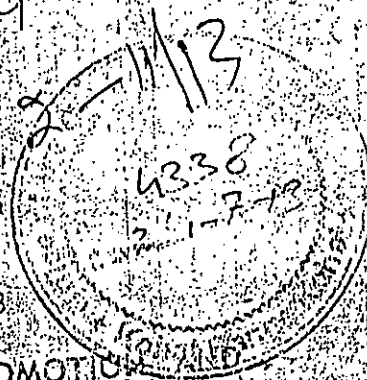
**Attested**  
*[Signature]*  
To be true copy  
Advocate

From: The Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawa

To: All Heads of Police in Khyber Pakhtunkhwa

No. 176112-5 dated Peshawar the 22/7 /2013

Subject: ACCELERATED /OUT OF TURN PROMOTION /SELECTION FOR IN SERVICE TRAINING /COURSE



Memo: Please refer to Standing Order No. 6/2008, Endst. No. 4282-4327/C-1, dated: 04.06.2008

1. The Apex Supreme Court of Pakistan has passed a judgment regarding out of turn promotion of Police officers in which it has been held that "Out of turn promotion is not only against the constitution, but also against injunctions of Islam. Out of turn promotion in a Public department generates frustration and thereby diminishes the spirit of Public service. It generates undue preference in a Public Service. Element of reward and award is good to install the spirit of service of community, but should not be made basis of accelerated promotion"

2. It has further been held by Apex Court that performance of duty with due diligence and efficiently deserved due appreciation but it could not be over appreciated out of proportion so as to make out a case of grievance to other employees in Service and Department.

3. As per decision / judgments of the apex Court any kind of special / out of turn promotion should be stopped

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*Handwritten:* All DPOs / Head of Divisions to ensure compliance to ensure same copy in EC

(KHALID MASOOD)  
Add: IGP/Headquarters  
For Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar

*Handwritten signature:* M. M. P.

E- (59) Amer G

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

*M. Qureshi*  
District Police Officer, Karak

OFFICE OF THE DISTRICT POLICE OFFICER, KARAK

No. 12425 /EC, dated Karak the 13/8 /2013.

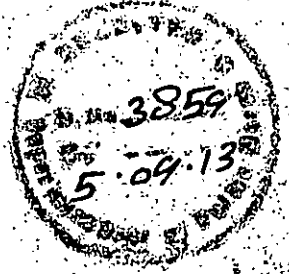
Copy of above is submitted to the Dy: Inspector General of Police, Kohat Region Kohat for favour of information w/r to his Office Endst: No.6013-15/EC, dated 12.08.2013 Please.

*M. Qureshi*  
District Police Officer, Karak



Annex: "D"

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 03/09/2013.

Subject: - OUT OF TURN / ACCELERATED PROMOTION

MEMORANDUM.

Kindly refer to this office Memo No. 6130/EC dated 16.08.2013 and favour this office with the order passed in the case, so that promotion process could be finalized as directed by your good office vide Memo: No. 19982-20016/E-II dated 19.08.2013.

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

No. 6744 /EC

Copy to District Police Officer, Karak for information w/r to his Memo: No. 11201/EC, dated 29.08.2013.

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

SRC  
Per action.

Distt: Police Officer  
Karak

4/9

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727  
2015  
فایم خورد

کسیه ایوان آریل شیری به مبلغ ۱۰۰۰  
صحتی بجز بر صحت او الکترونیک

۵۰۰  
مادونیک ان ایزو سیک

Attest  
22.08.16

**BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR**

Appeal No. 727/2015

Qasim Mehmood Head Constable ..... (Appellant)

Versus

The Provincial Police Officer, Khyber Pakhtunkhwa. & Others  
..... (Respondents)


Subject: **SUPPLEMENTARY APPLICATION FOR DISMISSAL OF SERVICE APPEAL**

Respectfully sheweth

The respondent no. 04 submits the following for kind consideration:

1. That the services appeal of appellant, Qasim Mehmood, is subjudice in this honorable Tribunal and Para wise comments on behalf of respondents have been submitted.
2. That the appellant was dealt with departmentally on account of professional misconduct resulting therein in his dismissal from service vide order of the undersigned dated 10.02.2016. (Copy as annexure-A)
3. That still now the appellant has not moved any departmental appeal against his dismissal.
4. That besides above, the appellant has been charged / arrested in criminal cases.
5. That due to dismissal from service of the appellant, he is no more a public servant and his appeal is not maintainable in eyes of law which is infructuous.

In view of the above, it is therefore, prayed that the appeal, being infructuous, may kindly be dismissed, please.

  
District Police Officer, Karak  
2 (Respondent No.4)

**BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR**

Appeal No. 727/2015

Qasim Mehmood Head Constable ..... (Appellant)

Versus

The Provincial Police Officer, Khyber Pakhtunkhwa. & Others  
..... (Respondents)

Subject: **SUPPLEMENTARY APPLICATION FOR DISMISSAL OF SERVICE APPEAL**

Respectfully sheweth

The respondent no. 04 submits the following for kind consideration:

1. That the services appeal of appellant, Qasim Mehmood, is subjudice in this honorable Tribunal and Para wise comments on behalf of respondents have been submitted.
2. That the appellant was dealt with departmentally on account of professional misconduct resulting therein in his dismissal from service vide order of the undersigned dated 10.02.2016. (Copy as annexure-A)
3. That still now the appellant has not moved any departmental appeal against his dismissal.
4. That besides above, the appellant has been charged / arrested in criminal cases.
5. That due to dismissal from service of the appellant, he is no more a public servant and his appeal is not maintainable in eyes of law which is infructuous.

In view of the above, it is therefore, prayed that the appeal, being infructuous, may kindly be dismissed, please.

  
District Police Officer, Karak  
(Respondent No.4)

## ORDER

My this Order will disposed off five (05) departmental enquiries against **Constable Qasim Mehmood No.656** of this district Police as detail given below:-

Facts are that :-

1. Constable Qasim Mehmood No.656 while posted as Gunner to Gul Sahib Khan, MPA, shown himself as Incharge Shaheen Squad passed an information to District Control Room Karak to provide two Squad from Sabir Abad to Kamran Shaheed Chowk and from Kamran Shaheed Chowk to DDAC Office Karak on his own well without bringing the same into the notice of his Senior Officers. He was issued Charge Sheet and statement of allegation and the SDPO Banda Daud Shah was appointed as enquiry Officer to conduct proper departmental enquiry against him. The enquiry officer reported that the defaulter Constable misuses his power which is against the service discipline but he excused of his illegal act before the enquiry officer and was recommended for award of minor punishment of Censure.

2. AS per report of District Police Officer, Nowshera received under RPO Kohat Endst: No.6339/GC, dated 08.09.2015, Constable Qasim Mehmood No.656 while posted as Gunner with the than DPO Nowshera were issued with Govt: weapon i.e. 02-SMG rifles, 07-Magazines and 210-rounds from the Kot of District Nowshera but he failed to deposit the same back with I/C Kot Nowshera on his transfer. He was issued a show cause Notice vide this Office No.375/E.C, dated 11.09.2015 but he failed to submit his reply up till now.

3. Constable Qasim Mehmood No.656 while posted at Police Lines Karak has absented himself from his lawful duty without any leave or prior permission w.e.from 15.09.2015 vide Daily Diary No.33, dated 15.09.2015 Police Lines Karak till date. He was issued Charge Sheet and Statement of allegation and SDPO Banda Daud Shah was appointed as enquiry Officer to conduct proper departmental enquiry against him but the defaulter Constable did not bother to face the enquiry process and the enquiry Officer recommended him for stoppage of pay. The defaulter Constable was issued with Final Show Cause Notice through Director Information Khyber Pakhtunkhwa, Peshawar vide this Office Memo:No. 529/PA(Enq) dated 24.11.2015 for advertisement in the daily Urdu newspapers Mashriq and Aaj but he miserably failed to submit reply before the Enquiry Officer for his defence.



4. Constable Qasim Mehmood No.656 while posted as Incharge Shaheen Squad, the Arms & Ammunition were issued to him from the Kot of District Police Lines Karak but he failed to deposit the same back with Inchage Kot Karak, inspite of repeated directions i.e. 01-9MM pistol No.109/MM alongwith 02-Chargers and 30- rounds, 01- LMG No.M801649 alongwith 02-

rounded Magazines and 150-rounds of 7.62 bore and 01-SMG No.4608769 alongwith 04-Magazines and 120-rounds with bundle wear. He was issued Charge Sheet and statement of allegation and the SDPO Banda Daud Shah was appointed as enquiry Officer to conduct proper departmental enquiry against him but he failed to face the process of enquiry.

5. Constable Qasim Mehmood No.656 has directly been charged in criminal case FIR No. 535, dated 09.10.2015 u/s 489-F PPC Police Station Karak. He was placed under suspension vide this Office O.B.No.395, dated 20.10.2015 and issued charge sheet and statement of allegation and SDPO Banda Daud Shah was appointed as enquiry officer to conduct proper departmental enquiry against him and to submit findings in stipulated period. The enquiry officer reported that the defaulter Constable failed to face the enquiry proceedings and recommended him for proper departmental action.

Keeping in view of the available record and facts on file, Constable Qasim Mehmood No.656 is found guilty in the entire enquiry process. His above mentioned acts are stigma on the Police Force. His further retention is not in the interest of the department. Therefore, he is awarded Major punishment of dismissal from service with immediate effect. The absence period is treated as leave without pay. Beside his dismissal, the SDPO Hqrs Karak/SHO PS Karak has been directed to register a proper case under section 409 PPC against the defaulter Constable.

OB No. 72  
Dated 10/02/2016

  
District Police Officer, Karak  


BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

S.A.No.727/2015

Muhammad Qasim.....Appellant

V/S

Provincial Police Officers and others.....Respondents

**REJOINDER ON BEHALF OF THE APPELLANT**

**Respectfully Sheweth**

The preliminary objections raised by answering respondents at S.No.1 to 5 are erroneous and frivolous, having no factual and legal backing, hence are not tenable in the eyes of law and the respondents will not absolve themselves by such unsatisfactory replies.

**FACTS:**

Para-1 to 7 of the comments are incorrect, while that of main appeal are correct. However, the appellant has been discriminated; the other officials/ officers of the same department are enjoying the same benefits of out of turn promotion. Moreover, the respondents are bound down under the law to follow the directives/ instructions of the august Supreme Court of Pakistan in toto not in parts, as evident from the documents attached with the main appeal. The respondents themselves confused how to revert the officials/ officers from out of turn promotion and in this respect they themselves seeking guidelines from the high-ups, which is till date not answered by the competent authority.

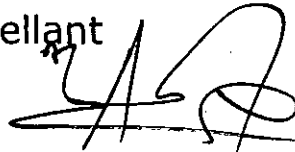
**GROUNDS**

Grounds A to F are incorrect, misleading, misconceived against the facts and circumstances, the unsatisfactory reply of the respondents will not absolve them from the legal and lawful right on the promotion of the appellant. However, the appellant has been discriminated; the other

officials/ officers of the same department or enjoying the same benefits of out of turn promotion. Moreover, the respondents are bound down under the law to follow the directives/ instructions of the august Supreme Court of Pakistan in toto not in parts, as evident from the documents attached with the main appeal. The respondents themselves confused how to revert the officials/ officers from out of turn promotion and in this respect they themselves seeking guidelines from the high-ups, which is till date not answered by the competent authority.

It is, therefore, humbly prayed that, on acceptance of this Rejoinder the comments filed by respondents may kindly be declared as illegal and against the facts & circumstances and the Appeal of the appellant may kindly be allowed as prayed for.

Appellant  
Through

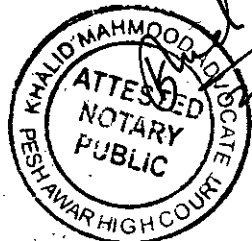


**Muhammad Arif Jan**  
Advocate High Court  
Peshawar

**AFFIDAVIT**

I, do hereby affirm and declare on oath that the contents of the accompanying **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

  
Deponent





BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

S.A.No.727/2015

Muhammad Qasim.....Appellant

V/S

Provincial Police Officers and others.....Respondents

**REJOINDER ON BEHALF OF THE APPELLANT**

**Respectfully Sheweth**

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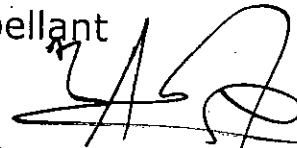
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officials/ officers of the same department or enjoying the same benefits of out of turn promotion. Moreover, the respondents are bound down under the law to follow the directives/ instructions of the august Supreme Court of Pakistan in toto not in parts, as evident from the documents attached with the main appeal. The respondents themselves confused how to revert the officials/ officers from out of turn promotion and in this respect they themselves seeking guidelines from the high-ups, which is till date not answered by the competent authority.

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Appellant  
Through

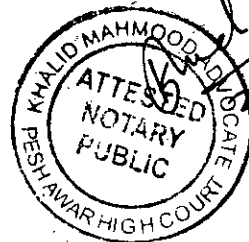


**Muhammad Arif Jan**  
Advocate High Court  
Peshawar

**AFFIDAVIT**

I, do hereby affirm and declare on oath that the contents of the accompanying **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

  
Deponent



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. 6130 /EC, Dated Kohat the 16/8 /2013.

Subject: - OUT OF TURN PROMOTION.

MEMORANDUM.

Kindly refer to your office Memo: No. 2359-65/Legal, dated 06.08.2013.

It is submitted that District Police Officers of this Region are being directed for compliance & report of the lower subordinates related to their Districts.

Moreover, the following Police Officers have been promoted out of turn/accelerated promotion under Standing Order No. 06/2008 on adhoc basis by CPO, which is required to be reverted by your good self order please: -

Sr. No.	Name of District	Name of Police Officer
1.	Kohat District	1. Inspector Jehangir Khan 2. Inspector Ali Hassan (now ACE KPK) 3. Inspector Arman Gul (Shaheed) 4. SI Shah Duran 5. ASI Abdullah
2.	Hangu District	✓ 1. Inspector Gul Jamal (Now A/DSP FRP Kohat) ✓ 2. SI Gulzar Khan
3.	Karak District	1. ASI Qismat Khan 2. ASI Hakeem Shah ] = Not demoted

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