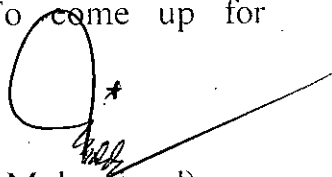


25.11.2022

Learned counsel for the appellant present. Mr. Atta-ur-Rehman, Inspector (Legal) alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.


Learned Member Judicial Mr. Salah-ud-Din is on leave, therefore, bench is incomplete. Adjourned. To come up for arguments on 14.02.2023 before the D.B.

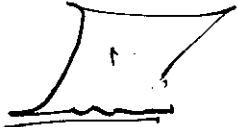

(Mian Muhammad)
Member (E)

14.02.2023

Learned counsel for the appellant present. Mr. Umair Azam Khan, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment being not prepared for arguments today. Adjourned. To come up for arguments on 17.05.2023 before the D.B.


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)


SCANNED
11/11/22
Peshawar


SCANNED
14/02/23
Peshawar

12.05.2022

Clerk to counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondent present.

Clerk to counsel for the appellant requested for adjournment as counsel for the appellant is not available today, due to general strike of the Khyber Pakhtunkhwa Bar Council. To come up for arguments before the D.B on 18.07.2022.


(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman


18.07.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Atta Ur Rehman Inspector for respondents present.

Former requested for adjournment in order to prepare the brief of the case. Adjourned. To come up for arguments on 14.09.2022 before D.B.


(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)

14.09.2022

Junior to counsel for appellant present.

Muhammad Riaz Khan Painsakheil, learned Assistant Advocate General alongwith Atta Ur Rehman Inspector for respondents present.

Former made a request for adjournment as senior counsel for appellant is busy before Federal Service Tribunal, Islamabad. Adjourned. To come up for arguments on 25.11.2022 before D.B.


(Fareeha Paul)
Member(E)

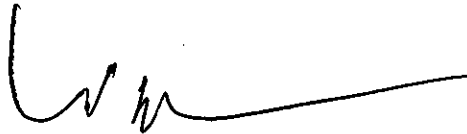

(Rozina Rehman)
Member(J)

21.10.2021

Counsel for the appellant present.

Mr. Muhammad Rasheed, Deputy District Attorney alongwith Mr. Khyal Roz Inspector (Legal) for respondents present.

Respondents submitted reply/comments. Learned counsel for the appellant requested for adjournment; granted. To come up for rejoinder if any, and arguments on 01.02.2022 before D.B.



(ATIQ UR REHMAN WAZIR)
MEMBER (E)



(ROZINA REHMAN)
MEMBER (J)


01.02.2022

Clerk of learned counsel for the appellant present. Mr. Abdul Baseer, Inspector (Legal) alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 12.05.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah-ud-Din)
Member (J)

23.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 16.06.2021 for the same as before.


Reader

16.06.2021

Junior to counsel for the appellant and Mr. Muhammad Rashid, DDA alongwith Khial Roz, Inspector for the respondents present.

Representative of the respondents seeks time to furnish reply/comments. Respondents are directed to submit written reply/comments in office within 10 days after receipt of the order positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21.10.2021 before the D.B.

Stipulated period has passed and reply has not been submitted.


Chairman

P.S

29.06.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.




Chairman

26.01.2021

Mr. Maaz Madni, Advocate, for appellant is present.

According to the learned counsel representing appellant consequent upon the appearance of appellant before the Departmental Promotion Committee, he was promoted to the rank of ASI on adhoc basis, his services were entrusted to the Directorate of Anti-Corruption Establishment Khyber Pakhtunkhwa on deputation. The Regional Police Officer, Mardan Region-I, Mardan, by virtue of letter dated 14.05.2019 sought a certificate to the effect that no departmental inquiry is in existence against adhoc promoted ASIs for their regular promotion to list-D for promotion of Officiating ASIs. On constituting the Departmental Promotion Committee for the purpose of promotion of Adhoc ASIs to ASIs on Officiating basis in the office of respondent no. 3 whereby appellant was approved for promotion as Officiating ASI subject to his repatriation which act was done and completed on 25.10.2019 for giving effect to his promotion subject to provisions of ACR for the years 2016 and Elite Tactical Course. Appellant has already undergone the rigors of training. Surprisingly, appellant received impugned order dated 02.01.2020 whereby he alongwith his colleague Mr. Maqsood Ali were reverted to the rank of IHC which order was called in question in departmental representation which was declined however, the representation submitted by Mr. Maqsood Ali was accepted. Feeling aggrieved from the order dated 26.02.2020 he filed petition under rule-11-A of the Police Rules, 1975, which was ultimately regretted by affording no reasonable ground, with no adequate remedy left available he approached this Tribunal for redressal of his grievance.

The point so agitated at the bar needs consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 23.04.2021 before S.B.

Appellant Deposited
Security & Process Fee

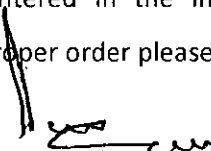

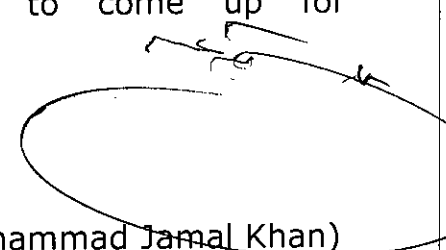
(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 111 38 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/09/2020	<p>The appeal of Mr. Wakeel Zaman presented today by Mr. Muhammad Maaz Madni Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/11/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
09.11.2020		<p>Nemo for the appellant.</p> <p>Since the Members of the High Court as well as of the District Bar Associations, Peshawar, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 26.01.2021 on which date to come up for preliminary hearing before S.B.</p> <p style="text-align: right;"> (Muhammad Jamal Khan) Member (Judicial)</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____/2020

WAKEEL KHAN

V/S

GOVT. OF KP
& OTHERS

INDEX

S.NO	DOCUMENTS	DATED	ANNEXURE	PAGE
1	Memo of appeal		1 – 5
2	Letter	07.12.2016	A	6 – 8
3	Order	09.12.2016	B	9 – 10
4	Letter	14.05.2019	C	11 – 12
5	Reminder	29.05.2019	D	13
6	Letter	10.06.2019	E	14
7	Approval order	24.09.2019	F	15
8	Repatriation Order	25.10.2019	G	16
9	Certificate		H	17
10	Standing Order No. 10/2014		I	18
11	Impugned Order	02.01.2020	J	19
12	Representation	13.01.2020	K	20 – 22
13	Letters	26.02.2020	L	23 – 24
14	11-A petition	24.03.2020	M	25 – 26
15	Appellate order	29.07.2020	N	27
16	Letter	26.08.2020	O	28
17	Wakalat Nama		29

Dated: 21-09-2020

APPELLANT

Through:

MUHAMMAD MAAZMADNI 21/09
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 11138 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10490

Dated 21-9-2020

WAKEEL KHAN, IHC No. 309
Police Line, Mardan.
R/O Baghicha Dhery, District Mardan

.....APPELLANT

VERSUS

1. THE INSPECTOR GENERAL OF POLICE,
Khyber Pakhtunkhwa, Central Police Office, Peshawar.
2. THE ADDITIONAL INSPECTOR GENERAL (ESTABLISHMENT),
Central Police Office, Peshawar.
3. THE REGIONAL POLICE OFFICER,
MardanRangion-1, District Mardan.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 02-01-2020 WHEREBY THE APPELLANT HAS NOT BEEN CONFIRMED IN THE RANK OF ASI (OFFICIATING) AND REVERTED TO HIS SUBSTANTIVE RANK OF IHC AND AGAINST THE APPELLATE ORDER DATED 29-07-2020 WHEREBY THE DEPARTMENTAL APPEAL 24-03-2020 OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS

PRAYER:

That on acceptance of this appeal the impugned orders dated 02-01-2020 and 29-07-2020 may very kindly be set aside and the respondents may be directed to restore and confirm the appellant on the Rank of ASI (officiating) from the date when the other colleague has been restore with all back & consequential benefits including seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

Respectfully Sheweth:

FACTS:

Brief facts which give rise to the instant appealare as under:-

1. That, the appellant is the Law abiding, peaceful & bonafide resident of District Mardan and is the employee of the respondent Department.

Filed to-day
Registrar
21/9/2020

2. That, the respondent Department issued a circular vide letter dated 07-12-2016 to the concerned Districts & Units of the Department asking for the eligible incumbents listed therein in the letter to appear before the DPC to be held on 09-12-2016 for promotion to the rank of ASIs (on adhoc basis).

Copy of the letter dated 07-12-2016 is attached as ANNEXURE A.

3. That in compliance to the circular dated 07-12-2020 the appellant appeared before the Departmental Promotion Committee DPC the appellant was promoted to the rank of ASI (on Adhco basis) vide order dated 09-12-2016 and placed as serial no. 32 of the promotion order.

Copy of the Order dated 09-12-2016 is attached as ANNEXUREB.

4. That with the promotion to the rank of Adhoc ASI the appellant's services were entrusted to Directorate of Anti-Corruption Establishment Khyber Pakhtunkhwa on deputation basis and worked there as Adhoc ASI quite efficiently, whole heartedly and with full devotion.

5. That respondent no. 3 issued a circular vide letter dated 14-05-2019 to the respective Districts/Units asking for No Departmental Enquiry certificate in respect of the Adhoc promoted ASIs on their promotion to list 'D' to be furnish within 7 days positively in connection with promotion of Officiating ASIs followed by a reminder dated 29-05-2019 and accordingly the information was intimated to respondent no. 3 from the office of Assistant Director (Admin) Anti-Corruption Establishment, Khyber Pakhtunkhwa vide letter dated 10-06-2019.

Copy of the Letter dated 14.05.2019, Reminder dated 29.05.2019 & Letter date 10.06.2019 is attached as ANNEXURE C,D& E.

6. That respondent after completion of the record constituted Departmental Promotion Committee (DPC) for promotion of the Adhoc ASIs to ASIs on Officiating basis in the office the respondent no. 3 and accordingly the appellant was approved for promotion as Officiating ASI subject to repatriation from Anti-Corruption establishment vide letter dated 24-09-2019 and hence the appellant was repatriated to respondent department on 25-10-2019 for actualizing his promotion with the condition that the promotion of the appellant would be subject to provision of

ACRs for the year 2016 and Elite Tactical Course within a stipulated time.

Copy of the approval order dated 24.09.2019 & Order date 25.10.2019 is attached as ANNEXURE F&G.

7. That name of the appellant was also recommended for the course but the appellant provided the requisites to the respondents as the appellant has already completed the requisite course in 2013 and according to Standing Order No. 10/2014 any officer who has completed the Basic Elite Course shall be exempted from Elite training course.

Copy of the Certificate & Standing Order No. 10/2014 is attached as ANNEXUREH& I.

8. That the appellant was astonished when the appellant received the impugned order dated 02-01-2020 whereby the appellant along with one another colleague namely Mr. Maqsood Ali No. 90 were reverted to the rank of IHC without mentioning any cogent or plausible reason.

Copy of the Impugned Order dated 02-01-2020 is attached as ANNEXURE J.

9. That the appellant feeling aggrieved from the impugned order dated 02-01-2020 filed representation dated 13-01-2020 before respondent no. 3 but the representation of the appellant was decline vide letter dated 26-02-2020 and the representation submitted by Mr. Maqsood Ali No. 90 who was on same position and conditions as that of the appellant was accepted vide letter 26-02-2020.

Copy of the Representation & letters are attached as ANNEXURE K& L.

10. That feeling highly aggrieved from the order dated 26-02-2020 the appellant filed 11-A petitioner by submitted representation dated 24-03-2020 before the respondent no. 1 but the same was also regretted vide appellate order dated 29-07-2020 on no good grounds which communicated to the appellant through letter dated 26-08-2020 and received to the appellant on 02-09-2020.

Copy of the 11-A petitioner & Appellate order dated 29.07.2020 & Letter dated 26.08.2020 is attached as ANNEXUREM,N& O.

11. That the appellant having no other efficacious, adequate and alternate remedy but to approach this Honourable Tribunal on the following grounds amongst others:

G R O U N D S:-

- A- That act of the respondents while not confirming & restoring the appellant on the post of ASI (Officiating) and issuing of the impugned order dated 02-01-2020 and thereafter passing the appellate order dated 29-07-2020 is against the Law, Rule, fact & material available on record hence not tenable in the eye of Law and is liable to be set aside.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and malafide manner while not confirming & restoring the appellant on the post of ASI (Officiating) and issuing of the impugned order dated 02-01-2020 and thereafter passing the appellate order dated 29-07-2020.
- D- That the act of the respondents while not confirming & restoring the appellant on the post of ASI (Officiating) and issuing of the impugned order dated 02-01-2020 and thereafter passing the appellate order dated 29-07-2020 is against the norms of Natural Justice, therefore the same is not tenable in the eye of law and needs to be struck down
- E- That, the appellant has highly been discriminated by the respondent while not confirming & restoring the appellant on the post of ASI (Officiating) and issuing of the impugned reversion order dated 02-01-2020 and thereafter passing the appellate order dated 29-07-2020 on the score that the second colleague Mr. Maqsood Ali No. 90 who were also reverted to the rank of IHC vide impugned reversion order but is promoted vide order dated 26-02-2020 as his representation before the respondent no. 3 was accepted and that of the appellant was reject.
- F- That the appellant has completed all the requisite conditions well before the promotion to the rank of ASI (Officiating) even then the appellant is deprived of from his due right of confirmation & restoration in the rank of ASI (Officiating) rather to revert the appellant to his substantive post of IHC.
- G- That respondent have taken the shelter of incomplete ACR for the year 2016 and placed all the burden of proof on the shoulder of the appellant.

- H- That the respondent have also not taken into consideration that the appellant has already completed Elite Training Course in 2013 and according to para-5 of the standing order issued from the office of respondent no. 1 have clear direction that "any officer who has completed the Basic Elite Course shall be exempted from Elite training course" but despite that the respondent issued them impugned reversion order dated 02-01-2020.
- I- That act of the respondent by issuing the impugned reversion order dated 02-01-2020 is clear violation of the Principal of Locus Poententiae, as the appellant has worked for quite considerable time as an Adhoc ASI and second as an Officiating ASI also.
- J- That act of the respondent is also against Section-7 of the Civil Servant Act 1973 read with Rule-16 of the Khyber Pakhtunkhwa (Appointment, Promotion & Transfer), Rules 1989.
- K- That act of the respondents while not confirming & restoring the appellant on the post of ASI (Officiating) and issuing of the impugned order dated 02-01-2020 and thereafter passing the appellate order dated 29-07-2020 is violative under Article 38 (e) of the Constitution of Pakistan, 1973 as it has clearly been mentioned in the ibid article that state is bound:
 "to reduce disparity in the income and earnings of the individuals including persons in the various services of Pakistan",
 Therefore, in light of the above mentioned Article the appellant is fully entitle to be retained as ASI (Officiating).
- L- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

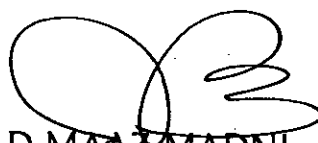
It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 21-09-2020

Appellant


 WAKEEL KHAN

Through


 MUHAMMAD MAAZ MADNI
 Advocate, 21/9.
 High Court, Peshawar

6

ANNEXURE - A

Government of Khyber Pakhtunkhwa
Office of the Deputy Inspector General of Police
Mardan Region-I, Mardan
Phone No. 0937-9230113, Fax No. 0937-9230115.

- To:
1. Additional Inspector General of Police Special Branch, KPK, Peshawar.
 2. Additional Inspector General of Police Investigation CPO, KPK Peshawar.
 3. Capital City Police Officer, Peshawar.
 4. Deputy Inspector General of Police, CTD, KPK, Peshawar.
 5. Deputy Inspector General of Police Traffic, KPK, Peshawar.
 6. Deputy Inspector General of Police Traffic Warden KPK, Peshawar.
 7. Commandant PTC, Hangu.
 8. Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
 9. AIG Establishment CPO, Peshawar.
 10. District Police Officer Lakki, Marwat.
 11. All DPOs in Mardan Region-I, Mardan.
 12. DSP Welfare & PQR, Peshawar.

No. 17839-53 /ES.

07, December, 2016.

Subject: PROMOTION:

Memo:

A DPC meeting in connection with the promotion of Head Constables to the rank of ASIs (on adhoc basis) will be held in this office on 09.12.2016 at 09:00 hours.

The following Head Constables of your Districts/Units and on deputation to other Units may be informed to appear before the DPC on due date & time:-

S. No.	Name of ASIs	Present place of posting	S. No.	Name of ASIs	Present place of posting
1.	IHC Awal Khan No. 878	Nowshera	61.	IHC Jan Muhammad No. 1211	Charsadda
2.	IHC Khan Zeb No. 18/250	Nowshera	62.	IHC Noorul Amin No. 171	Nowshera
3.	IHC Murad Khan No. 1918	Nowshera	63.	IHC Sebz Ali No. 1182	Mardan
4.	IHC Fakhar Alam No. 192	On deputation to Investi. CPO, Peshawar from Nowshera District	64.	IHC Kifayat Ullah No. 767	Mardan
5.	IHC Jan Alam No. 363	Swabi	65.	IHC Mian Gul No. 1085	Swabi
6.	IHC Imtiaz Ali No. 173	Mardan	66.	IHC Yousaf Khan No. 497	Mardan
7.	IHC Muhammad Riaz No. 68	Mardan	67.	IHC Yousaf Shah No. 671/1332	Mardan
8.	IHC Javid Hussain No. 849	Swabi	68.	IHC Maqsood Ali No. 90/135	On deputation to live CPO, Peshawar from Mardan District
9.	IHC Alamzeb No. 2792	Mardan	69.	IHC Irfikhar Ali No. 1108	Mardan
10.	IHC Jehangir No. 836	Nowshera	70.	IHC Suliman No. 1494	Mardan
11.	IHC Sheraz Khan No. 1510	Mardan	71.	IHC Sadat Ali No. 1476	Mardan
12.	IHC Zahoor Ahmad No. 945/445	On deputation to Spl. Branch from Charsadda District	72.	IHC Yaqoob Khan No. 383	Swabi
13.	IHC Haji Muhammad Tahir No. 34	Nowshera	73.	IHC Abdul Qayum No. 811	Charsadda
14.	IHC Shad Muhammad No. 1477	Mardan	74.	IHC Muhammad Ali No. 1583	Mardan
15.	IHC Muhammad Jehangir No. 142	Swabi	75.	IHC Nezakat Ali No. 61	On deputation to P. Hangu from Mardan Distr
16.	IHC Hazrat Ali No. 1331	Mardan	76.	IHC Khalid No. 38	On deputation CCP/Peshawar from Mardan District

Attested

(7)

2

	IHC Murad Ali No. 801	Swabi	77	IHC Majid Khan No. 10	On deputation to Peshawar from Mardan District
18.	IHC Muhammad Iqbal No. 306	Mardan	78	IHC Shah Nawaz No. 478	On deputation to Mardan from Mardan District
19.	IHC Niaz Muhammad No. 1213	Charsadda	79	IHC Imtiaz Ali No. 770	On deputation to Peshawar from Mardan District
20.	IHC Gulshan Khan No. 841	Nowshera	80	IHC Wisal Ahmed No. 1379	Mardan
21.	IHC Syed Sardar Ali No. 741	On deputation to PQR, Peshawar from Swabi District	81	IHC Ishfaq Hussain No. 418	On deputation to Traffic Warden Peshawar from Mardan District
22.	IHC Ashfaq Ali No. 481	Nowshera	82	IHC Muhammad Rafiq No. 784	On deputation to Elite Force KPK Peshawar from Mardan District
23.	IHC Fakhruz Zaman No. 744	Swabi	83	IHC Sadiq Zaman No. 915	On deputation to CTD KPI Peshawar from Swabi District
24.	IHC Ismail Khan No. 1007/119	On deputation to Invest. CPO, Peshawar from Charsadda District	84	IHC Shahid Ali Khan No. 33	Swabi
25.	IHC Noorul Islam No. 1034	Nowshera	85	IHC Mustagfir Shah No. 1216	Charsadda
26.	IHC Hukam Khan No. 26	Swabi	86	IHC Manzoor Khan No. 1503	Mardan
27.	IHC Amjad Ali No. 292	On deputation to CTD KPK from Mardan District	87	IHC Syed Kazim Bacha No. 738	Mardan
28.	IHC Abdul Qadir No. 1483	Mardan	88	IHC Shahab Ahmed No. 203	Swabi
29.	IHC Javid Akbar No. 1486	Mardan	89	IHC Sajid Ali No. 1338	Mardan
30.	IHC Muhammad Hassan No. 1408	On deputation to CTD KPK from Mardan District	90	IHC Haider Ali No. 1051	On deputation to CTD KPK Peshawar from Mardan District
31.	IHC Ijaz Ali No. 424	Mardan	91	IHC Naveed Mushtaq No. 36	On deputation to Traffic Peshawar from Mardan District
32.	IHC Wakeel No. 309/1593	Mardan	92	IHC Husban Ullah No. 134	On deputation to Special Branch, Peshawar from Charsadda District
33.	IHC Asad Iqbal No. 1454	Mardan	93	IHC Shah Jehan No. 1226	Charsadda
34.	IHC Fazal Wahid No. 510	Charsadda	94	IHC Noor Azeem No. 1132	Nowshera
35.	IHC Shah Jehan No. 1083/935	On deputation to CCP Peshawar from Charsadda District	95	IHC Muhammad Saddique No. 2649	Mardan
36.	IHC Afsar Zaman No. 143	On deputation to CTD KPK from Nowshera District	96	IHC Amjad Ali Shah No. 855	Charsadda
37.	IHC Mukhtiar Muhammad No. 570	Mardan	97	IHC Asim Ullah No. 493	Charsadda
38.	IHC Nadeem Hussain No. 102	Mardan	98	IHC Muhammad Izhar No. 445	Charsadda
39.	IHC Sajid Rashid No. 1159	On deputation to Traffic Peshawar from Mardan District	99	IHC Asad Zaman No. 05	Swabi
40.	IHC Irfikhar Khan No. 139	Swabi	100	IHC Muhammad Israil No. 1498	Mardan
41.	IHC Nazar Muhammad No. 30	Swabi	101	IHC Irfikhar Ahmad No. 872	Mardan
42.	IHC Muhammad Riaz No. 149	On deputation to Special Branch from Charsadda District	102	IHC Hamid Khan No. 1389	On deputation to Elite Force KPK Peshawar from Mardan District
43.	IHC Masood Khan No. 977	Nowshera	103	IHC Fazal Akbar No. 315	Nowshera

Attested

9

ANNEXURE-B

ORDER

Consequent upon recommendation by the DPC held in this office on 02.12.2016, in the light of CPO/Peshawar direction vide Memo No. 4555-61/E-01 dated 02.12.2016, the following Head Constables on list 'D' are hereby promoted as ASIs on adhoc basis against the vacant posts of ASIs reserved for direct appointees by the Public Service Commission Khyber Pakhtunkhwa, Peshawar with immediate effect and till further orders:-

S. No.	Name & No.	Place of Posting	S. No.	Name & No.	Place of posting
1.	IHC Awal Khan No. 878/1048	Nowshera	2.	IHC Khan Zeh No. 12/250	Nowshera
3.	IHC Murad Khan No. 1014	Nowshera	4.	IHC Fakhr Alam No. 192	On deputation to CPO Peshawar from Nowshera
5.	IHC Jan Alam No. 363	Swabi	6.	IHC Intiaz Ali No. 1433	Mardan
7.	IHC Muhammad Riaz No. 264/68	Mardan	8.	IHC Javid Hussain No. 426	Mardan
9.	IHC Alamzeb No. 2792	Mardan	10.	IHC Jehangir No. 836	Nowshera
11.	IHC Sheraz Khan No. 1516	Mardan	12.	IHC Zahoor Ahmad No. 945/145	On deputation to Special Branch Peshawar from Charsadda
13.	IHC Hajr Muhammad Tahir No. 34	Nowshera (on loan from Mardan)	14.	IHC Shad Muhammad No. 1477	Mardan
15.	IHC Muhammad Jehangir No. 142	Swabi (on loan from Mardan)	16.	IHC Hazrat Ali No. 1331	Mardan
17.	IHC Murad Ali No. 801	Mardan	18.	IHC Muhammad Iqbal No. 306	Mardan
19.	IHC Niaz Muhammad No. 1213	Charsadda	20.	IHC Gulshan Khan No. 841	Nowshera
21.	IHC Syed Surdar Ali No. 741	On deputation to PCR Peshawar from Swabi	22.	IHC Ashfaq Ali No. 481	Nowshera
23.	IHC Fakhraz Zaman No. 744	Swabi	24.	IHC Ismael Khan No. 1607/19	On deputation to West Peshawar from Charsadda
25.	IHC Noorul Israr No. 1034	Nowshera	26.	IHC Hukam Khan No. 26	Swabi
27.	IHC Anjida Ali No. 292	On deputation to CTD Peshawar from Mardan	28.	IHC Abdul Qadir No. 1480	Mardan
29.	IHC Javid Akbar No. 1486	Mardan	30.	IHC Muhammad Hassan No. 1403	On deputation to CTD Peshawar from Mardan
31.	IHC Huz Ali No. 424	Mardan	32.	IHC Wasim No. 3494/13/593	Mardan
33.	IHC Asad Iqbal No. 1454	Mardan	34.	IHC Fazal Wahid No. 510	Mardan
35.	IHC Shah Jahan No. 1083/3935	On deputation to CPO Peshawar from Charsadda	36.	IHC Afsar Zaman No. 143	On deputation to CTD Peshawar from Nowshera
37.	IHC Muhtasham Muhammad No. 570	Charsadda	38.	IHC Nadeem Hussain No. 102	Mardan
39.	IHC Saad Rashed No. 1159	On deputation to Traffic Peshawar from Mardan	40.	IHC Imkhar Khan No. 139	Swabi
41.	IHC Nazir Muhammad No. 30	Swabi	42.	IHC Muhammad Riaz No. 349	On deputation to Special Branch Peshawar from Charsadda
43.	IHC Maseud Khan No. 977	Nowshera	44.	IHC Muhammad Paheem No. 351/898	Swabi
45.	IHC Muhammad Idrees No. 149	Mardan	46.	IHC Zawar Hussain No. 605	Mardan
47.	IHC Mian Hazrat Shah No. 1214	Charsadda	48.	IHC Shah Zamin No. 271/282/CTD	On deputation to CTD Peshawar from Swabi
49.	IHC Anwar Behzad No. 260/480 SB	On deputation to Special Branch Peshawar from Swabi	50.	IHC Khuristan No. 88	Mardan
51.	IHC Anjad Ali No. 865	Charsadda	52.	IHC Abdur Rashid No. 70/167	Charsadda
53.	IHC Syed Shujat Ali Shah No. 666	Swabi	54.	IHC Gul Feroz No. 434	Nowshera
55.	IHC Murad Ullah No. 1645	Nowshera	56.	IHC Hayat Khan No. 06	Swabi
57.	IHC Tariq Aziz No. 1481	Mardan	58.	IHC Hazrat Nabi No. 1492	Mardan
59.	IHC Zafar Khan No. 1215	Charsadda	60.	IHC Anjad Ali No. 390	Nowshera
61.	IHC Jab Muhammad No. 1211	Charsadda	62.	IHC Noorul Ahsan No. 171	Nowshera
63.	IHC Saad Ali No. 1182	Mardan	64.	IHC Kifayat Ullah No. 767	Mardan
65.	IHC Mian Gul No. 1085	Swabi	66.	IHC Yousaf Khan No. 497	Mardan
67.	IHC Yousaf Shah No. 671/1332	On deputation to Special Branch from Mardan	68.	IHC Maseud Ali No. 1/135	On deputation to West CTD Peshawar from Mardan
69.	IHC Imkhar Ali No. 1108	Mardan	70.	IHC Sultman No. 1494	Mardan
71.	IHC Sadat Ali No. 1476	Mardan	72.	IHC Yaqoob Khan No. 383	Swabi
73.	IHC Abdul Qayyum No. 811	Charsadda	74.	IHC Muhammad Ali No. 1583	Mardan

Signature and Stamp area

Order

Consequent upon recommendation by the DPC held in this office 09-12-2016, in the light of CPO/Peshawar direction vide Mem: No. 4555-61/E-III dated 02-12-2016, the following Head Constable on list "D" are by promoted to ASIs on adhoc basis against the vacant posts of ASIs reserved for direct appointees by the Public Service Commission Khyber Pakhtunkhwa, Peshawar with immediate effect and till further orders:

S.No.	Name & No.	Place of Posting	S.No	Name & No.	Place of Posting
1	IHC Awal Khan No. 878/048		2	Not Relevant	
	Not Relevant		4		
	Not Relevant		6	Not Relevant	
	Not Relevant		8		
	Not Relevant	Not Relevant	10	Not Relevant	
		Not Relevant	12		
	Not Relevant		14	Not Relevant	
	Not Relevant		16		
			18	Not Relevant	
	Not Relevant		20		
			22	Not Relevant	
	Not Relevant		24		
			26	Not Relevant	
	Not Relevant		28		
			30		
	Not Relevant		32.	IHC Wakeel No. 309/413/1593	Mardan
	Not Relevant				
	Not Relevant				



12

34.	ADHOC ASI Fazal Wahid No. 510	80	ADHOC ASI Ishfaq Hussain No. 418
35.	ADHOC ASI Shah Jehan No. 3935	81	ADHOC ASI Muhammad Rafiq No. 784
36.	ADHOC ASI Afsar Zaman No. 143	82	ADHOC ASI Sadig Zaman No. 915
37.	ADHOC ASI Mukhtiar Muhammad No. 570	83	ADHOC ASI Shahid Ali Khan No. 33
38.	ADHOC ASI Nadeem Hussain No. 102	84	ADHOC ASI Mustagfir Shah No. 1216
39.	ADHOC ASI Said Rashid No. 1159	85	ADHOC ASI Manzoor Khan No. 1503
40.	ADHOC ASI Iftikhar Khan No. 139	86	ADHOC ASI Syed Kazim Bacha No. 738
41.	ADHOC ASI Nazar Muhammad No. 30	87	ADHOC ASI Shahab Ahmed No. 203
42.	ADHOC ASI Nezakat Ali No. 61	88	ADHOC ASI Sajid Ali No. 1338
43.	ADHOC ASI Khalid Khan No. 786	89	ADHOC ASI Haider Ali No. 1051
44.	ADHOC ASI Majid Khan No. 10	90	ADHOC ASI Naveed Mushtaq No. 36
45.	ADHOC ASI Masood Khan No. 977	91	ADHOC ASI Husban Ullah No. 134
46.	ADHOC ASI Muhammad Faheem No. 391		

The following information may also be provided to this office on the below prescribed proforma.

S. No.	Name & No.	Elite Tactical Course qualified/not qualified
--------	------------	---

Classification of ACRs for the year 2014, 2015, 2016, 2017 & 2018

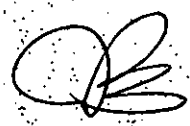
Detail of duration qualified mandatory training as per Police Rules 19.25A from the below Schools:-

- A. Police School of Investigation Peshawar.
- B. Police School of Intelligence Abbotabad.
- C. Police School of Tactics, Peshawar.
- D. Police School of Explosive Handling Nowshera.
- E. Police School of Information Technology Peshawar.
- F. Police School of Public Disorder and riot management Mardan.

Muhammad Ali Khan
 (MUHAMMAD ALI KHAN)PSP
 Regional Police Officer,
 Mardan.

Copy to PA Region Office, Mardan with the direction to provide ACRs of the above mentioned Adhoc ASIs for the years mentioned above by tomorrow positively

(*****)

Attested


13

To: 1. The District Police Officer, Mardan, Swabi & Nowshera.
2. Central Units Elite Force KPK, Special Branch KPK, ACE KPK, BDU
KPK & Investigation CPO Peshawar.

No. 8325-32/ES.

29, May, 2019.

Subject: PROMOTION.

ANNEXURE - D

Memo:

Please refer to this office Memo: No. 7940-52/ES dated 14.05.2019 on the subject noted above.

Information of the following Adhoc ASIs of your Districts/Units have not been received and are still awaited.

It is therefore, requested that the same may be communicated on the below prescribed proforma immediately by today so their promotion process may be finalized in time once for all.

1. Fakhar-e-Alam No. 192 On deputation to Elite Force KPK from Nowshera District.
2. Wakeel No. 309 On deputation to ACE KPK from Mardan District
3. Asad Iqbal No. 1454 on deputation to BDU KPK from Mardan District
4. Nadeem Hussain No. 102 Mardan District
5. Hayat Khan No. 06 Swabi District
6. Maqsood Ali No. 90¹¹²⁵ on deputation to Invest: CPO Peshawar from Mardan District / ACE Peshawar
7. Yousaf Shah No. 671/1332 on deputation to Special Branch KPK from Mardan District
8. Yaqoob No. 383 Nowshera District
9. Sajid Ali No. 1338 Mardan District

S. No. Name & No. Elite Tactical Course qualified/not qualified

Classification of ACRs for the year 2014, 2015, 2016, 2017 & 2018

Detail of duration qualified mandatory training as per Police Rules 19.25A from the below Schools:-

- A. Police School of Investigation Peshawar.
- B. Police School of Intelligence Abbotabad.
- C. Police School of Tactics, Peshawar.
- D. Police School of Explosive Handling Nowshera.
- E. Police School of information Technology Peshawar.
- F. Police School of Public Disorder and riot management Mardan.

[Handwritten signature]

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(ISLAM GUL)
Office Superintendent
For Regional Police Officer,
Mardan



14

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

No.AD(Admn)/DACE/2-2/Officials/M.F/2019 (Vol-II) 114 2-2-24
Dated: 10.06.2019.

To

The Regional Police Officer,
Mardan.

ANNEXURE - E

Subject: **PROMOTION.**

Kindly refer office Letter No.7940-52/ES, dated: 14.05.2019, followed by reminder No.8325-32/ES, dated:29.05.2019, on the subject noted above and to state that the requisite information in respect of A/ASI Maqsood Ali No.135 and ASI Wakeel Khan No.309 of District Police Mardan, presently posted to this Establishment (on deputation basis) is as under:-

S.No.	Name & No.	Elite Tactical Course		Synopsis of years A/Cs				
		Qualified.	Not Qualified.	2014	2015	2016	2017	2018
1.	A/ASI Maqsood Ali No.135		Not qualified.				"A"	"A"
2.	ASI Wakeel Khan No.309	Qualified.	-	The official arrived in the Establishment on 11.07.2017				"A"

Moreover, it is, to certified that at present there is no departmental enquiry pending against the above named officials during his stay in this Establishment.

Yours faithfully,

Assistant Director (Admn)
Anti-Corruption Establishment,
Khyber Pakhtunkhwa,
Peshawar.

ENDST OF EVEN.NO. & DATE

Copy forwarded to :-

1. P.A to Director (ACE), Peshawar.
2. Official concerned.

Assistant Director (Admn)
Anti-Corruption Establishment,
Khyber Pakhtunkhwa,
Peshawar.

15

Government of Khyber Pakhtunkhwa

**Office of the Regional Police Officer,
Mardan**

Phone No. 0937-923011 Fax No. 0937-9230115.
Email Address: esrb.mardan@gmail.com

ANNEXURE-F

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

No. 11424 /ES.

24, September, 2019.

Subject: PROMOTION OF OFFICIATING ASIS.

Memorandum

It is submitted that the following Adhoc promoted ASIs/Head Constable of this Region, presently serving in Anti Corruption Establishment Khyber Pakhtunkhwa, Peshawar on deputation basis. They are approved for promotion as Offg. ASIs in the DPC held in this office on 17.09.2019 subject to repatriation from Anti Corruption Establishment Khyber Pakhtunkhwa, Peshawar.

1. ASI Wakeel Khan No. 309 (Mardan District)
2. ASI Maqsood Ali No. 90 / 125 (Mardan District)
3. IHC Amjad Ali Shah No. 885 (Charsadda District)

Their promotion order will be issued on their repatriation to Mardan Region.

It is therefore, requested, that their repatriation order may kindly be issued so that their proper promotion order be issued accordingly please.

**Regional Police Officer,
Mardan.**

o/c

No. 11425-27 /ES.

1. Copy of above is forwarded for information and necessary action to the Director Anti Corruption Establishment Khyber Pakhtunkhwa, Peshawar.
2. District Police Officer, Mardan.
3. District Police Officer, Charsadda.

**Regional Police Officer,
Mardan.**

o/c

Noted
[Signature]



DIRECTORATE OF
ANTI-CORRUPTION ESTABLISHMENT
KHYBER PAKHTUNKHWA
PESHAWAR

Attested
[Signature]

2167-12

Encls: No. AD(Admin)/ACE/2-2/Officials/M.F/2019 (704-11) dated: 15.11.2019.

Copy forwarded to :-

1. The Deputy Inspector General of Police (HQs) for Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer, Mardan Region, Mardan.
3. The District Police Officer, Mardan
4. The Assistant Director (Crimes), ACE, Mardan with the request to relieve the official.
5. The Cashier / Accountant, Directorate of ACE, Peshawar, with the direction to forward the LPC and Service record to the quarter concerned accordingly.
6. PA to Director (ACE), Peshawar.

[Signature]
ASSISTANT DIRECTOR (ADM)

BETTER COPY OF PAGE NO.

G -

16

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

No. 2690 dated Peshawar the 25/10/2019

ORDER.

The following ASIs of Mardan District presently serving in Anti-Corruption Establishment, Khyber Pakhtukhwa Peshawar are hereby repatriated in his parent Region i.e. Mardan with immediate effect.

1. Wakeel Khan No. 309
2. Maqsood Ali No. 90

Sd/-

SHER AKBAR
PSP, S.St

Deputy Inspector General Of Police HQrs
For inspector general of police
Khyber Pakhtunkhwa, Peshawar

DIRECTORATE OF
ANTI CORRUPTION ESTABLISHMENT
KHYBER PAKHTUNKHWA
PESHAWAR

Endst: No. AD (Admn)/ DACE/2-2/ Officials/M.F/2019 _____ dated: 15.11.2019

Attested


Elite Police Training Centre



Let it be known that:

3271 HC-Wakeel Khan

Successfully Completed The
Command Course

From: 12th Nov. 2012 to :2nd Feb. 2013


PRINCIPAL


Commandant Elite Force

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

Handwritten text: (17) ANNEXURE - H



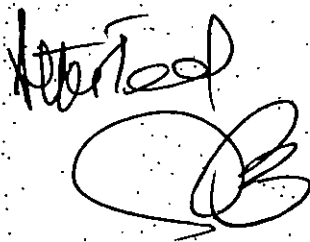
STANDING ORDER NO. 10/2014

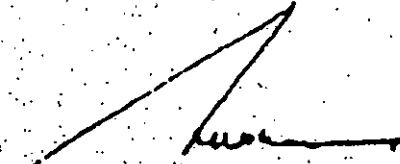
ANNEXURE - I

Mandatory Elite Training

This Standing Order is issued under Article 10(3) of Police Order 2002 in pursuance of the Police Policy Board decision taken in its 2nd meeting held on 8th January 2014.

2. **Aim:** This Standing Order also aims at building the capacity of Police officers in such essential skills that enable them to meet the challenges of terrorism and militancy.
3. A Lower Subordinate shall not be promoted as ASI unless he, in addition to other mandatory requirements, completes a mandatory eight (8) weeks Elite Tactical Training Course.
 - 3.1 A Lower School Course qualified Lower Subordinate shall be eligible for the Elite Tactical Training Course.
4. A Probationer ASI (P-ASI) shall undergo a six (6) months mandatory Elite Training Course immediately after completing his Probationer Course at PTC Hangu. The P-ASI, after the successful completion of Elite Training Course, shall be returned to his respective District for undergoing A, B, C and D Courses.
5. Any officer who has successfully completed the Basic Elite Course shall be exempted from the Elite training courses mentioned in this Standing Order.
6. Female Police officers are exempted from the Elite training courses mentioned in this Standing Order.
7. **Power to remove difficulties:** If any difficulty arises in giving effect to this order, the Provincial Police Officer may by notification make such provisions as deemed appropriate.
8. **Amendment:** All previous Standing Orders on the subject, to the extent of the provisions of this order, shall stand amended.




(NASIR KHAN DURRANI)
Provincial Police Officer
Khyber Pakhtunkhwa
Peshawar

19

ANNEXURE - J

ORDER

On Repatriation from Anti Corruption Establishment Khyber Pakhtunkhwa, Peshawar to his parent Region Mardan, vide CPO Peshawar Order No. 2690/E-III dated 25.10.2019, the following Police Officials are hereby transferred/Posted to Operation Wing, Mardan with immediate effect and till further orders.

1. IHC Wakeel Khan No. 309
2. IHC Maqsood Ali No. 90

Regional Police Officer,
Mardan.

No. 58-60/ES,

Dated Mardan the 02/1/2020.

Copy forwarded with the above quoted reference for information and necessary action to the:-

1. Addl. Inspector General of Police, Headquarter, Khyber Pakhtunkhwa, Peshawar.
2. Director Anti Corruption Establishment Khyber Pakhtunkhwa, Peshawar
3. District Police Officer, Mardan.

(*****)

To
The Regional Police Officer,
Mardan Range-1,
Mardan.

20

ANNEXURE-K

Subject:- Representation against the order dated
02-01-2020 (Endorsement No.58-60/ES)

Sir,

It is submitted that your Honour has ordered my posting as IHC, vide the captioned order.

1. It is submitted that I was employed in Mardan District, as IHC, when a number of IHC's was recommended for promotion from list "D" to the post of adhoc ASI, by your Honour vide letter No. 10957-77/ES dated 09-12-2016, at serial No.32.

(Copy Annexure-"A")

2. That my name was also recommended by the DPC at serial No.32 vide No.7940-52/ES dated 14-05-2019.


(Annexure-"B" & "BA")

3. That a number of adhoc ASI's/IHC's were ordered to be promoted as officiating ASI's vide No.11377-80/ES dated 20-09-2019. But, being on deputation to ACE Estab, the effect of my promotion was subjected to my repatriation.

(Copy Annexure-"C")

4. That the effect of my promotion was clarified to be affective subject to my repatriation from ACE Estab; vide letter No. 11424 / ES dated 24-09-2019.

(Copy Annexure-"D")

Accepted


5. That I was repatriated from ACE on 25-10-2019 as contained in this office No. 58-60 / ES dated 02-01-2020. Resultantly, I was ordered to be posted as IHC. (Copy Annexure-"E")
6. That it is submitted that the order in-question to the extent of posting as IHC is unjustified and against my accrued rights, as I have already been recommended and promoted as officiating ASI vide order dated 24-09-2019 but subject to the condition of repatriation from deputation from the ACE as per order dated 24-09-2019 (Copy Annexure-D above)
7. That there is no legal reason to avoid the order of my promotion as effecting ASI.
8. That it is added that I had already undergone the command course successfully in 2013, and the worthy PPO vide S.O. No.10/1024 dated 08.01.2014 at item No.5 had ordered that officer, having completed the Basic Elite Course shall be exempted from the Elite Training course, mentioned in the standing order. (Copies Annexures 1 & 2)
9. That it is apprehended that the afore-said order dated 24-09-2019 (Annexure-D above) is oversights from the consideration of your honour.
10. That several officers junior to me are posted as officiating ASI's.

[Handwritten signature]
[Handwritten initials]

It is submitted that the impugned order may be revised and I may be posted as officiating ASI and oblige,

22

Dated:- 13.01.2020.

Your's Obedientely

W/akeel (P)
(Wakeel Khan)
ASI No-309
Police Lines,
MARDAN.

Attested





GOVERNMENT OF KHYBER PUKHTUNKHWA,
OFFICE OF THE REGIONAL POLICE OFFICER,
MARDAN

Phone No. 0937-9230113, Fax No.0937-9230115.
Email, digmardan@gmail.com

23

ANNEXURE-2

To The District Police Officer, Mardan.

No. 2187 IES, dated Mardan Region, the 26/2/2020

Subject: APPLICATION.


Memo:

Reference to the above noted subject.

Application submitted by IHC Wakeel Khan No: 309 of Mardan District wherein he requested for promotion to the rank of officiating ASI. The perusal of Departmental Promotion Committee Meeting's minutes depicted that the applicant was recommended for promotion to the rank of officiating ASI (BPS-11). He was promoted conditionally "subject to completion of Elite Tactical Course as well as completion of ACR for the year 2016 by 10.10.2019 and in case of failure his name will be de-notified".

In light of categorical recommendations made by the Departmental Promotion Committee vide its meeting held on 17.09.2019, the applicant failed to complete his AGR within stipulated period rather he completed the same in mid of December, 2019 and January, 2020.

Hence, the application is hereby rejected/filed, being devoid of merit/substance.


Regional Police Officer,
Mardan.

1737
27-2-20
EC/031
An...
DPO/Mardan
26-2-2020

Attested

ASG/





24

GOVERNMENT OF KHYBER PUKHTUNKHWA,
OFFICE OF THE REGIONAL POLICE OFFICER,
MARDAN

Phone No. 0937-9230113, Fax No. 0937-9230115.
Email. diqmardan@gmail.com

To The District Police Officer, Mardan.
The District Police Officer, Charsadda.

No. 2/77-78 /ES, dated Mardan Region, the 26/2/2020

Subject: PROMOTION AS OFFICIATING ASSISTANT SUB INSPECTORS.

Memo:

In pursuance of Departmental Promotion Committee Meeting held in this office vide dated 17.09.2019, the following "D" list Head Constables, on repatriation from Anti Corruption Establishment, Khyber Pakhtunkhwa vide CPO, Peshawar letter No. 2690/E-II, dated 25.10.2019 and Order Endst: No. 9871-72/E-IV, dated 08.10.2019, are hereby promoted to the rank of officiating ASIs (BPS-11) on probation for a period of two (02) years as per Police Rules 13.18 with their colleagues, subject to completion of Elite Tactical Course:-

1. ✓ Head Constable Maqsood Ali No. 90 (District Mardan)
2. Head Constable Amjid Ali Shah No. 885 (District Charsadda)

On promotion they will remain posted to the districts mentioned against their names.

Necessary gazette notification may be issued accordingly.


Regional Police Officer,
Mardan.

Allested



To

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

Through proper channel.

Subject: - Representation

Sir,

It is submitted that the worthy DIG/RPO, Mardan has ordered the promotion of Head Constable, namely H. C. Maqsood Ali No.90 (District Mardan) to the post of officiating Assistant Sub-inspector vide letter No.2177-78/Es dated 26-02-2020, depriving me from the right of such promotion.

It is submitted that the said Maqsood Ali is junior to me.

Moreover, administratively, the said Maqsood Ali stood on equal footing with me, when we both were reverted by the R.P.O, Mardan from the post of officiating Asi to the post of IHC vide Endorsement dated 02-01-2020, on our repatriation from Anti-Corruption Establishment, on the grounds of not having undergone the course of "ELITE TACTICAL COURSE" and the non-availability of ACR for the year-2016.
(Copy Attached).

I, along-with Maqsood Ali submitted separate Representations to The R.P.O Mardan on 13-01-2020, against the aforesaid order of reversion, through proper channel. (Copies attached).

But, the Worthy R.P.O, Mardan, without adjudicating upon my representation, ordered the promotion of Maqsood Ali HC to the post of Asi vide letter dated 26-02-2020, treating me otherwise i.e, not promoting me as such, though the said Maqsood Ali is Junior to me.

The material legal points are not taken into consideration that I had successfully undergone the Commando Course, in 2013, and the worthy P.P.O had directed vide S.O No.10/1024 dated 08-01-2014 at item No.5 thereof, that "officers, having completed the basic Elite Traing Course" were exempted from the Elite Traing Course, as mentioned in the above referred standing orders. While, the second legal point of non-availability of ACR is also not taken into consideration that completion of the ACR is not the job of the concerned Civil Servant. But, it is the duty of the reporting officer, as well as, the

25
ANNEXURE-M
Accepted [Signature]

comtersigningofficer. Hence, in case of non-availability of the ACR, the concerned Civil servant cannot be held responsible for the same and action is to be taken against the aforesaid two officers.

Moreover, the points raised in my representation dated 13.01.2020 are not taken into consideration. Although, my previous service record including the previous ACRS are into consideration.

It is requested that treating me equally with MrMaqsood Ali, I may also be promoted as such i.e, the officiatingASI, with back service benefits.

Dated:-24-3-2020

Your'sObediently

Waqeel Khan
(Wakéel Khan)
IHC No.309
Mardan Police.

Accepted

[Signature]

27

ANNEXURE - N
=

From: The District Police Office,
Mardan.

To: The Registrar,
Central Police Office,
Khyber Pakhtunkhwa Peshawar.

No. 241 /LB, dated Mardan the 29-07 /2020.

Subject: REPRESENTATION.

Memo:-

Reference your office letter No.6475/E-IV dated 09.06.2020.

The requisite report regarding the subject is as under:-

Representation submitted by IHC Wakeel Khan No. 309 of this district, wherein he has requested for promotion to the rank of officiating ASI. It is worthwhile that case of the applicant was considered for promotion to the rank of officiating ASI during Departmental Promotion Committee Meeting held on 17.09.2019, according to which he was promoted conditionally "Subject to completion of Elite Tactical Course as well as completion of ACR for the year 2016 by 10.10.2019 and in case of failure his name will be de-notified".

However, despite laps of sufficient time he failed to complete his ACR within stipulated period rather he completed the same in mid of December, 2019 and January, 2020. Therefore, the Regional Police Officer Mardan did not notify his name and the same was due to lethargic attitude of applicant.

Encls: (21-Pages)

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OB

District Police Officer,
Mardan

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28

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

No. 9825 /E-IV dated Peshawar 26/8 /2020

To: The District Police Officer,
Mardan.

ANNEXURE 0

Subject: REPRESENTATION

Memo:

Please refer to your office memo No. ²⁴¹ 841/LB dated: 29.07.2020 on the subject noted above.

The applicant may please be informed according to the contention of your above quoted reference please.

919/LB
21-09-20

DSP/legal, EC
for injection.

by
DPO/Mardan
01/09/20

E-c

for n/a.

(KASHIF ZULFIQAR) P.S.P
AIG/Establishment
for Inspector General of Police,
Khyber Pakhtunkhwa.

4982
1-8-20

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(POWER OF ATTORNEY) (29)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2020

WAKEEL KHAN

VS

POLICE DEPARTMENT

I, Wakeel Khan do hereby nominated and appointed **MUHAMMAD MAAZ MADNI**, Advocate, High Court, Peshawar, to be counsel in the above matter for me/us and on my/our behalf as agreed to appear, plead, act and answer in the above court or any appellate court or any court to which the business is transferred in the above matter as and is agreed to sign and file petition, appeals, statements, accounts, exhibits, compromises or other documents whatsoever, in connection with the said matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc and to apply for and issue summons and other writs or subpoena and to apply for and get issued any arrest, attachment or other execution, warrants or order and to conduct any proceedings that may arise there out; and to apply for and receive payment of any or all sums or submit the above matter to arbitration, and to employ an other legal practitioner authorizing him to exercise the power and authorities hereby conferred on the advocate whenever he may think fit to do so.

AND to do all acts legally necessary to manage and conduct the said case in all respects whether herein specified or not, as may be proper and expedient.

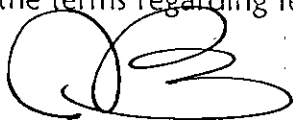
AND I/WE hereby agree to ratify and confirm all lawful acts done on my/our behalf; under or by virtue of these present or of the usual practice in such matter. PROVIDED always that I/WE undertake at the time of calling of the case by the court I/MY authorized agent shall inform the advocate and make him appear in the court, if the case, may be dismissed in default, it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

IN WITNESS WHERE OF I/We hereunto set MY/OUR hand to these presents, the contests of which have been explained to and understood by ME/US this 21st day of September 2020.

EXECUTANT

Wakeel Khan
(Wakeel Khan)

Accepted subject to the terms regarding fees:



MUHAMMAD MAAZ MADNI, 21/9/2020

ADVOCATE HIGH COURT,

PESHAWAR

BC No. (BC-11-1460)

CNIC No. 17101-9263898-1

OFFICE: KHATTAK LAW ASSOCIATES,
Juma Khan Plaza, Warsak Road, Peshawar.
Contact#: 0333-9313113, 0345-9090737

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

Service Appeal No. 11138/2020

Wakeel Khan, IHC No.309

.....Appellant

VERSUS

The Inspector General of Police, Khyber Pakhtunkhwa and other

.....Respondents

INDEX

S. No.	Description of Documents	Annexure	Pages.
1.	Written Reply.	----	1-3
2.	Affidavit.	----	4
3.	Copy of DPC meeting	A	5-6
4.	Copy of minutes	B	7-12
5.	Copy of Affidavit	C	13
6.	Copy of Authority Letter.	----	14

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**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
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Service Appeal No. 11138/2020

Wakeel Khan, IHC No.309

.....Appellant

VERSUS

The Inspector General of Police, Khyber Pakhtunkhwa and other.....

.....Respondents

Para-wise reply by respondents:-

Respectfully Sheweth,

PRELIMINARY OBJECTIONS



1. That the appellant has not approached this Hon'ble Tribunal with clean hands.
2. That the appellant has concealed the actual facts from this Hon'ble Tribunal.
3. That the appellant has got no cause of action and locus standi to file the instant appeal.
4. That the appellant is estopped by his own conduct to file the instant Service Appeal.
5. That the appeal is unjustifiable, baseless, false, flawless and vexatious and the same is liable to be dismissed with special compensatory cost in favour of respondents.

REPLY ON FACTS

1. Para to the extent of bonafide resident of District Mardan pertains to record, while rest of Para is not plausible.
2. Correct to the extent that a DPC meeting was scheduled to be held in Region Office Mardan on 09.12.2016 regarding promotion of eligible Head Constable to the rank of ASI on Adhoc basis.
3. Correct to the extent that a letter was issued to all District Police Officers Mardan Region regarding meeting of Departmental Promotion Committee vide dated 07.12.2016 and not 07.12.2020. In light of the said letter, a DPC meeting was held on 09.12.2016 and the appellant alongwith others were promoted to the rank of ASI on Adhoc basis (Copy of DPC meeting is annexed as annexure -"A").
4. Para to the extent of Performing duties with devotion, while heartedly and especially is not plausible because any Police Officer is under obligation to perform his duties efficiently, whole heartedly and devotedly.

2

5. Correct to the extent that a letter was addressed to all concerned for forwarding no Departmental Enquiry Certificates in respect of all those Police Officers who fell within the domain of promotion as officiating ASI.
6. Correct to the extent that the appellant was recommended for promotion to the rank of officiating ASI subject to the conditions mentioned in the minutes (Copy of minutes is annexed as annexure -"B"). But despite giving a lot of time he did not bother to remove the deficiency in terms of providing his ACR. Therefore, his name was not notified.
7. Correct to the extent that those Police Officers who have completed Basic Elite Course shall be exempted from Elite Tactical Course.
8. Incorrect. The appellant had been given promotion to the rank of Ad-hoc ASI by taking proper affidavit that at any time he may be reverted and he duly submitted affidavit by agreeing to the said condition. Hence, plea of the appellant is not plausible (Copy of affidavit is enclosed as annexure "C").
9. Correct to the extent that the appellant's representation was filed being bitterly failed to remove the deficiency despite the categorical recommendations made in the Departmental Promotion Committee. However, rest of the para is incorrect hence, denied.
10. Correct to the extent that the appellant filed Revision Petition before the Inspector General of Police Khyber Pakhtunkhwa, which was paid due heed but being devoid of any merit, the same was rejected/filed.
11. That the appeal of the appellant is not maintainable and liable to be dismissed on the following grounds amongst the others:-

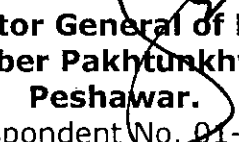
REPLY ON GROUNDS:

- A. Incorrect. Plea taken by the appellant is devoid of merit because orders passed by the competent appellate authorities are legal and lawful and in accordance with the conditions mentioned in the minutes of Departmental Promotion Committee.
- B. Incorrect. Stance of the appellant is totally ill founded because the respondents have no grudges against the appellant.
- C. Already explained in paras ibid.
- D. Incorrect. As explained earlier the respondents have no grudges against the appellant, therefore; acting in arbitrary and malafide manner by the respondents is out of question.
- E. Incorrect. The respondents have acted in accordance with law/rules and respondents never discriminated the appellant in any way.
- F. Incorrect, the appellant have not been deprived from his rights.
- G. Para already explained in detail.
- H. Para explained in the preceding paras.

- I. Detail reply already given above.
- J. Incorrect. Police is special force and special laws i.e Police Rules 1934 are applicable to the case of appellant.
- K. Incorrect. Plea taken by the appellant is not plausible. Details reply already given in Paras ibid.
- L. That the respondents also seek permission of this Honorable Tribunal to raise additional grounds at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that on acceptance of above submissions, appeal of the appellant may very kindly be dismissed with cost, please.


**Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.**
(Respondent No. 01-02)


**Regional Police Officer,
Mardan**
(Respondent No. 03)

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

Service Appeal No. 11138/2020

Wakeel Khan, IHC No.309Appellant

VERSUS

The Inspector General of Police, Khyber Pakhtunkhwa, Central Police Office,
Peshawar and others.....Respondents

COUNTER AFFIDAVIT.

We, the respondents do hereby declare and solemnly affirm on oath that the contents of the Para-wise comments in the service appeal cited as subject are true and correct to the best of our knowledge and belief and nothing has been concealed from this Honourable Tribunal.



[Signature]
**Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.**
(Respondent No. 01-02)

[Signature]
**Regional Police Officer,
Mardan**
(Respondent No. 03)

ORDER.

Consequent upon recommendation by the DPC held in this office 09.12.2016, in the light of CPO/Peshawar direction vide Memo: No. 4555-61/E-III dated 02.12.2016, the following Head Constables on list "D" are hereby promoted as ASIs on adhoc basis against the vacant posts of ASIs reserved for direct appointees by the Public Service Commission Khyber Pakhtunkhwa, Peshawar with immediate effect and till further orders:-

S. No.	Name & No.	Place of Posting	S. No.	Name & No.	Place of posting
1.	IHC Awal Khan No. 878/1048 ✓	Nowshera	2. ✓	IHC Khan Zeb No. 18/250 ✓	Nowshera
3.	IHC Murad Khan No. 1018 ✓	Nowshera	4.	IHC Fakhar Alam No. 192 ✓	On deputation to CPO Peshawar from Nowshera
5.	IHC Jan Alam No. 363 ✓	Swabi	6. ✓	IHC Imtiaz Ali No. 1473	Mardan
7. ✓	IHC Muhammad Riaz No. 264/68 ✓	Mardan	8. ✓	IHC Javid Hussain No. 426 ✓	Mardan
9. ✓	IHC Alamzeb No. 2792 ✓	Mardan	10. ✓	IHC Jehangir No. 836	Nowshera
11.	IHC Sheraz Khan No. 1510 ✓	Mardan	12.	IHC Zahoor Ahmad No. 945/445	On deputation to Special Branch, Peshawar from Charsadda
13.	IHC Haji Muhammad Tahir No. 34 ✓	Nowshera (on loan from Mardan)	14. ✓	IHC Shad Muhammad No. 1477	Mardan
15.	IHC Muhammad Jehangir No. 142 ✓	Swabi (on loan from Mardan)	16. ✓	IHC Hazrat Ali No. 1331	Mardan
17. ✓	IHC Murad Ali No. 801 ✓	Mardan	18. ✓	IHC Muhammad Iqbal No. 306	Mardan
19. ✓	IHC Niaz Muhammad No. 1213 ✓	Charsadda	20. ✓	IHC Gulshan Khan No. 841	Nowshera
21.	IHC Syed Sardar Ali No. 741	On deputation to PQR Peshawar from Swabi	22. ✓	IHC Ashfaq Ali No. 481	Nowshera
23.	IHC Fakhruz Zaman No. 744 ✓	Swabi	24.	IHC Ismail Khan No. 100/119	On deputation to Invest. Peshawar from Charsadda
25.	IHC Noorul Islam No. 1034 ✓	Nowshera	26. ✓	IHC Hukam Khan No. 26 ✓	Swabi
27.	IHC Amjid Ali No. 292	On deputation to CTD, Peshawar from Mardan	28. ✓	IHC Abdul Qadir No. 1480	Mardan
29.	IHC Javid Akbar No. 1486 ✓	Mardan	30.	IHC Muhammad Hassan No. 1408	On deputation to CTD, Peshawar from Mardan
31.	IHC Ijaz Ali No. 424 ✓	Mardan	32. ✓	IHC Wakeel No. 309/413/1593	Mardan
33.	IHC Asad Iqbal No. 1454 ✓	Mardan	34. ✓	IHC Fazal Wahid No. 510 ✓	Mardan
35.	IHC Shah Jehan No. 1083/3935 ✓	On deputation to CCP, Peshawar from Charsadda	36. ✓	IHC Afsar Zaman No. 143	On deputation to CTD, Peshawar from Nowshera
37. ✓	IHC Mukhtiar Muhammad No. 570 ✓	Charsadda	38. ✓	IHC Nadeem Hassan No. 102	Mardan
39.	IHC Said Rashid No. 1159	On deputation to Traffic, Peshawar from Mardan	40. ✓	IHC Ifikhar Khan No. 139 ✓	Swabi
41.	IHC Nazar Muhammad No. 30 ✓	Swabi	42.	IHC Muhammad Riaz No. 149	On deputation to Special Branch Peshawar from Charsadda
43.	IHC Masood Khan No. 977 ✓	Nowshera	44. ✓	IHC Muhammad Faheem No. 391/898 ✓	Swabi
45.	IHC Muhammad Idrees No. 149 ✓	Mardan	46. ✓	IHC Zawar Hussain No. 605 ✓	Mardan
47. ✓	IHC Mian Hazrat Shah No. 1214 ✓	Charsadda	48. ✓	IHC Shah Zaman No. 271/382/CTD ✓	On deputation to CTD Peshawar from Swabi
49.	IHC Anwar Behzad No. 260/480 SB	On deputation to Special Branch Peshawar from Swabi	50. ✓	IHC Khairstan No. 88	Mardan
51. ✓	IHC Amjad Ali No. 965 ✓	Charsadda	52. ✓	IHC Abdur Rashid No. 70/1167	Charsadda
53. ✓	IHC Syed Shujat Ali Shah No. 666 ✓	Swabi	54. ✓	IHC Gul Faraz No. 436 ✓	Nowshera
55. ✓	IHC Murad Ullah No. 1045 ✓	Nowshera	56.	IHC Hayat Khan No. 06	Swabi
57.	IHC Tariq Aziz No. 1481 ✓	Mardan	58. ✓	IHC Hazrat Nabi No. 1492	Mardan
59.	IHC Zafar Khan No. 1215 ✓	Charsadda	60.	IHC Amjad Ali No. 300	Nowshera
61.	IHC Jan Muhammad No. 1211 ✓	Charsadda	62.	IHC Noorul Amin No. 171	Nowshera
63.	IHC Sabz Ali No. 1182 ✓	Mardan	64.	IHC Kifayat Ullah No. 767	Mardan
65. ✓	IHC Mian Gul No. 1085 ✓	Swabi	66.	IHC Yousaf Khan No. 497	Mardan
67.	IHC Yousaf Shah No. 671/1332	On deputation to Special Branch from Mardan	68.	IHC Maqsood Ali No. 90	On deputation Invest CPO, Peshawar from Mardan
69.	IHC Ifikhar Ali No. 1108 ✓	Mardan	70.	IHC Suliman No. 1494	Mardan
71.	IHC Sadat Ali No. 1476 ✓	Mardan	72.	IHC Yaqoob Khan No. 383	Swabi
73.	IHC Abdul Qayum No. 811 ✓	Charsadda	74.	IHC Muhammad Ali No. 1583	Mardan

6

2

75.	IHC Nezakat Ali No. 61	On deputation to PTC Hangu from Mardan	76.	IHC Khalid No. 38	On deputation to Traffic, Peshawar from Mardan
77.	IHC Majid Khan No. 10	On deputation to PTC Hangu from Mardan	78.	IHC Shah Nawaz No. 478	On deputation to Lakki Marwat from Mardan
79.	IHC Imtiaz Ali No. 770	On deputation to CTD, Peshawar from Mardan	80.	IHC Wisal Ahmed No. 1379	Mardan
81.	IHC Ishfaq Hussain No. 418	On deputation to Traffic, Peshawar from Mardan	82.	IHC Muhammad Rafiq No. 784	On deputation to CTD, Peshawar from Mardan
83.	IHC Sadiq Zaman No. 915	On deputation to CTD, Peshawar from Swabi	84.	IHC Shahid Ali Khan No. 33	Swabi
85.	IHC Mustagfir Shah No. 1216	Charsadda	86.	IHC Manzoor Khan No. 1503	Mardan
87.	IHC Syed Kazim Bacha No. 738	Mardan	88.	IHC Shahab Ahmed No. 203	Swabi
89.	IHC Sajid Ali No. 1338	Mardan	90.	IHC Haider Ali No. 1051	On deputation to CTD, Peshawar from Mardan
91.	IHC Naveed Mushtaq No. 36	On deputation to Traffic, Peshawar from Mardan	92.	IHC Husban Ullah No. 134	On deputation to Special Branch from Charsadda

- 1) The promotion is purely on adhoc basis and the promotees shall not claim any right of seniority/benefit at any forum including Courts.
- 2) These Head Constables will liable to be reverted to their original rank any time.
- 3) The Period served on adhoc charge basis shall not be counted as Officiating or probation period at any cost.
- 4) The promotion is subject to the provision of an affidavit in the Establishment Branch of concerned DPO to the effect that they will not claim any seniority/benefit on the basis of this adhoc promotion.

(IJAZ AHMAD)PSP
Regional Police Officer,
Mardan.

No. 10957-77 /ES, Dated Mardan the 9 / 12 /2016.

Copy forwarded for information and necessary action to the:-

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar for favour of kind perusal please.
2. Additional Inspector General of Police Special Branch, KPK, Peshawar.
3. Additional Inspector General of Police Investigation CPO, KPK Peshawar.
4. Capital City Police Officer, Peshawar.
5. Deputy Inspector General of Police, CTD, KPK, Peshawar.
6. Deputy Inspector General of Police Traffic, KPK, Peshawar.
7. Deputy Inspector General of Police Traffic Warden KPK, Peshawar.
8. Commandant PTC, Hangu.
9. Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
10. AIG Establishment CPO, Peshawar.
11. District Police Officer Lakki, Marwat.
12. All DPOs in Mardan Region-I, Mardan.
13. All SsP Investigation in Mardan Region-I, Mardan.
14. DSP Welfare & PQR, Peshawar.

(*****)

Amma ek Ude "B"

1 "B"

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD IN THIS OFFICE ON 17.09.2019

A meeting of departmental Promotion Committee consisting of the District Police Officers, Mardan, Charsadda, Swabi & SP/Investigation, Nowshera of Mardan Region under the Chairmanship of Regional Police Officer, Mardan was held in this office on **17.09.2019**, wherein Promotion cases of 89 Adhoc Promoted ASIs & 14 Head Constables already on list "D" for promotion as Officiating ASIs were discussed/examined.

The committee Offered its recommendation as under: -

S. No.	Name & rank	Place of posting	Decision
1. ✓	Awal Khan No. 818	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
2. ✓	Khan Zeb No. 18	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
3. ✓	Murad Khan No. 1018	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
4.	Fakhar Alam No. 192	On deputation to Elite Force KP from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
5.	Jan Alam No. 363	On deputation to PTS Swabi from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
6.	Imtiaz Ali No. 173	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
7.	Muhammad Riaz No. 68	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
8.	Javed Hussain No. 849 ✓	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified-notified.
9.	Alam Zeb No. 2792 ✓	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
10. ✓	Jehangir Khan No. 836 ✓	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
11.	Sheraz Khan No. 1510	Investigation Wing, Mardan	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
12.	Zahoor Ahmad No. 945 ✓	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2015 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
13.	Haji Muhammad Tahir No. 34	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
14.	Shad Muhammad No. 1477	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 and for the period from 26.05.2017 to 31.12.2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
15.	Muhammad Jehangir No. 142 ✓	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
16.	Hazrat Ali No. 1331 ✓	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course



17.	Murad Ali No. 801 ✓	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
18.	Muhammad Iqbal No. 306 ✓	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the period from 08.06.2018 to 31.12.2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
19.	Niaz Muhammad No. 1213	Charsadda District.	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
20.	Gulshan No. 841	On deputation to EPTC Nowshera from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
21.	Syed Sardar Ali No. 741 ✓	On deputation to PQR from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
22.	Ishfaq Ali No. 481 ✓	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
23.	Fakhr ul Zaman No. 744 ✓	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
24.	Ismail Khan No. 100/119	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
25.	Noou ul Islam No.1034	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the period from 01.01.2018 to 02.07.2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
26.	Hukam Khan No. 26	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
27.	Amjad Ali No. 292 ✓	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
28.	Abdul Qadir No. 1483	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
29.	Javed Akbar No. 1486	On deputation to PDRM, School, Mardan from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
30.	Muhammad Hassan No. 1408	On deputation to CTD, KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
31.	Ijaz Ali No. 424	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
32.	Wakeel No. 309	On deputation to ACE KPK from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course, ACR for the year 2016 by 10.10.2019 as well as repatriation from ACE KPK. In case of non provision of ACR within stipulated period his name will be de-notified
33.	Asad Iqbal No. 1454	On deputation to BDU KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
34.	Fazal Wahid No. 510	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
35.	Shah Jehan No. 3935	On deputation to CTD KP from Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
36.	Afsar Zaman No. 143	On deputation to CTD KP from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
37.	Mukhtiar Muhammad No. 570	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
		Mardan District	Promoted conditionally subject to completion of Elite Tactical Course

Chamirif

39.	Said Rashid No. 1159	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified-notified.
40.	Iftikhar Khan No. 139	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
41.	Nazar Muhammad No. 30	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
42.	Khalid Khan No. 786	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
43.	Majid Khan No. 10	On deputation to PTC Hangu from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
44.	Masood Khan No. 977	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
45.	Muhammad Faheem No. 391	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
46.	Muhammad Idrees No. 149	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
47.	Zawar Hussain No. 649	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
48.	Mian Hazrat Shah No. 1214	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
49.	Shah Zaman No. 271/382	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
50.	Anwar Behzad No. 260/480 SB	On deputation to CTD KP from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
51.	Khairstan No. 88	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
52.	Amjad Ali No. 965	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
53.	Abdur Rashid No. 70	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
54.	Syed Shujat Ali Shah No. 666	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
55.	Gul Faraz No. 436	On deputation to CTD KP from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
56.	Murad Ullah No. 1045	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
57.	Hayat Khan No. 06	On deputation to PTC Hangu from Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
58.	Tariq Aziz No. 1481	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
59.	Hazrat Nabi No. 1492	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
60.	Zafar Khan No. 1215	- Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
61.	Amjad Ali No. 300	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
62.	Jan Muhammad No. 1211	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course

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63.	Noorul Amin No. 171	On deputation to PTC Hangu from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
64.	Sabz Ali No. 1182	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
65.	Kifayat Ullah No. 767	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
66.	Mian Gul No. 1085	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
67.	Yousaf Khan No. 497	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
68.	Yousaf Shah No. 671/1332	On deputation to Special Branch KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2017 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
69.	Maqsood Ali No. 90	On deputation to ACE KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as repatriation from ACE KPK
70.	Iftikhar Ali No. 1108	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
71.	Suliman No. 1494	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2017 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
72.	Sadat Ali No. 1476	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
73.	Yaqoob Khan No. 383	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
74.	Abdul Qayum No. 811	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
75.	Muhammad Ali No. 1583	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 & 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
76.	Shah Nawaz No. 478	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2015, 2016 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
77.	Imtiaz Ali No. 770	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
78.	Ishfaq Hussain No. 418	On deputation to Traffic KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
79.	Muhammad Rafiq No. 784	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
80.	Sadiq Zaman No. 915	On deputation to CTD KP from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
81.	Shahid Ali Khan No. 33	On deputation to Elite Force KP from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
82.	Mustagfir Shah No. 1216	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
83.	Manzoor Khan No. 1503	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
84.	Syed Kazim Bacha No. 738	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified

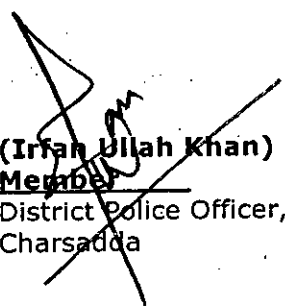
85.	Shahab Ahmed No. 203	On deputation to CTD KP from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
86.	Sajid Ali No. 1338	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
87.	Haide-notifiedr Ali No. 1051	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
88.	Naveed Mushtaq No. 36	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
89.	Husban Ullah No. 134	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
90.	IHC Meraj Habib No. 676/2348	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the period from 16.08.2014 to 31.12.2014 & for the year 2015 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
91.	IHC Shah Jehan No. 1226	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
92.	IHC Noor Azeem No. 1132	Investigation Wing, Nowshera	Promoted conditionally subject to completion of Elite Tactical Course
93.	IHC Muhammad Saddique No. 2649	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
94.	IHC Amjad Ali Shah No. 885	On deputation to ACE KP from Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as repatriation from ACE KPK
95.	IHC Asim Ullah No. 493	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
96.	IHC Muhammad Izhar No. 445	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
97.	IHC Asad Zaman No. 05	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
98.	IHC Muhammad Israil No. 1498	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
99.	IHC Iftikhar Ahmad No. 872	On deputation to PTS Swabi from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
100.	IHC Hamid Khan No. 1589	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
101.	IHC Fazal Akbar No. 315	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified


12




102.	IHC Muhammad Arshed No. 542	On deputation to PTS Swabi from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
103.	IHC Muhammad Aslam No. 122	Investigation Wing, Nowshera	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified

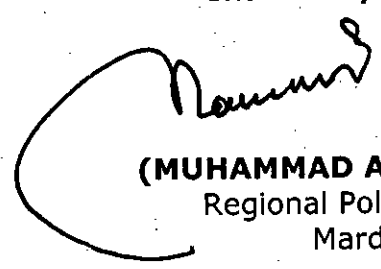

(Sajjad Khan) PSP
Member
District Police Officer,
Mardan.


(Irfan Ullah Khan) PSP
Member
District Police Officer,
Charsadda


(Syed Khalid Hamdani) PSP
Member
District Police Officer,
Swabi


(Iftikhar Shah)
Member
SP/Investigation,
Nowshera

Chairman/Approved


(MUHAMMAD ALI KHAN) PSP
Regional Police Officer,
Mardan.

حلفیہ بیان

ہم ذیل لسٹ-D ہیڈ کنسٹیبلان ضلع مردان پولیس تحریر ہذا کی رو سے اقرار کرتے ہیں کہ بحوالہ چھٹی انگریزی /
4655-61/E-III مورخہ 02.12.2016 جاری کردہ دفتر جناب انسپکٹر جنرل آف پولیس خیبر پختون خواہ سی پی او پشاور، ٹنڈو
درج ذیل شرائط و ضوابط کی مکمل پاسداری کریں گے اور جاری کردہ احکام کے خلاف کسی عدالت یا دیگر فورم پر مقدمہ دائر نہیں کریں
گے۔

1- حضرت علی 1331 ----- 7- محمد مصدق 1408 -----

شناختی کارڈ نمبر-3-16101-1179360 ----- شناختی کارڈ نمبر-9-16101-1230922 -----

موبائل نمبر-8346-9322226 ----- موبائل نمبر-0345-9342313 -----

2- ضمیر بیگان 2753 ----- 8- محمد رفیق خان 784 -----

شناختی کارڈ نمبر-5-17101-0309149 ----- شناختی کارڈ نمبر-5-16102-2284374 -----

موبائل نمبر-0343-8944563 ----- موبائل نمبر-0301-8196399 -----

3- سیدہ نواز خان 472 ----- 9- وکیل خان 413 -----

شناختی کارڈ نمبر-5-11201-9782015 ----- شناختی کارڈ نمبر-9-16101-0141975 -----

موبائل نمبر-0300-5659894 ----- موبائل نمبر-0345-9310016 -----

4- کامر زب 2792 ----- 10- عبدالغفار 1483 -----

شناختی کارڈ نمبر-9-16101-1272750 ----- شناختی کارڈ نمبر-9-16101-3823140 -----

موبائل نمبر-0313-9772020 ----- موبائل نمبر-0241-5772505 -----

5- سجاد علی 1338 ----- 11- حنیف خان 1503 -----

شناختی کارڈ نمبر-9-16102-2312036 ----- شناختی کارڈ نمبر-7-16101-2188763 -----

موبائل نمبر-0300-5734176 ----- موبائل نمبر-0344-9157729 -----

6- امتیاز احمد 872 ----- 12- محمد اقبال 306 -----

شناختی کارڈ نمبر-5-16101-4804485 ----- شناختی کارڈ نمبر-7-16101-1202529 -----

موبائل نمبر-0343-9857281 ----- موبائل نمبر-0201-1161176 -----

161

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

Service Appeal No. 11138/2020


Wakeel Khan, IHC No.309Appellant

VERSUS

The Inspector General of Police, Khyber Pakhtunkhwa, Central Police Office,
Peshawar and others.....Respondents

AUTHORITY LETTER.

Mr. Khyal Roz Inspector Legal, (Police) Mardan is hereby authorized to appear before the Honourable Service Tribunal, Khyber Pakhtunkhwa, Peshawar in the above captioned service appeal on behalf of the respondents. He is also authorized to submit all required documents and replies etc. as representative of the respondents through the Addl: Advocate General/Govt. Pleader, Khyber Pakhtunkhwa Service Tribunal, Peshawar.


**Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.**
(Respondent No. 01-02)


**Regional Police Officer,
Mardan**
(Respondent No. 03)