



- 17th April, 2023
1. Learned counsel for the appellant present. Mr. Fazal Shah, Mohmand, Addl: AG for the respondents present.
 2. Learned counsel for the appellant seeks adjournment. Last chance is given to the appellant. To come up for arguments on 14.06.2023 before D.B. P.P given to the parties.

SCANNED
BEST
PESHAWAR


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

Adnan Shah, P.A

31.08.2022

Bench is incomplete, therefore, case is adjourned to 10.11.2022 for the same as before.


Reader


10.11.2022


Junior to counsel for the appellant present.

Mr. Muhammad Adeel Butt, learned Additional Advocate General for the respondents present.

Former requested for adjournment due to engagement of learned senior counsel for the appellant in august Supreme Court of Pakistan. Adjourned. To come up for arguments on 09.01.2023 before the D.B.

SCANNED
KPST
Peshawar

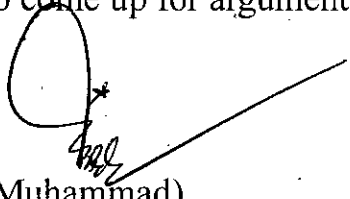

(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

09.01.2023

Learned counsel for the appellant present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General for official respondents present.

Learned counsel for the appellant requested that he was not feeling well, therefore, he has not made proper preparation for arguments. To come up for arguments on 17.04.2023 before D.B.


(Mian Muhammad)
Member (E)


(Salah-ud-Din)
Member (J)

SCANNED
KPST
Peshawar

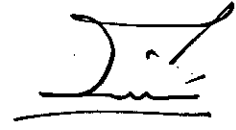
02.02.2022

Learned counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned with direction to learned counsel for the appellant to submit Member Copy of the instant appeal on the next day. To come up for arguments on 03.03.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah-Ud-Din)
Member (J)

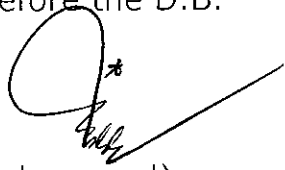
3-3-22

*Due to retirement of the Hon.ble
chairman the case is adjourned on
17-6-22
Mian
Reader*

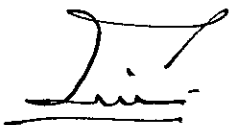
17.06.2022

Junior of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Junior of learned counsel for the appellant sought adjournment on the ground that learned counsel for the appellant is unable to attend the Tribunal today due to death of his close relative. Adjourned. To come up for arguments on 31.08.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

P.S

22.06.2021


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


Chairman

27.10.2021

Mr. Umer Farooq (junior of learned counsel for the appellant) present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present and submitted reply/comments, copy of which handed over to junior of learned counsel for the appellant, who sought time for submission of rejoinder. Adjourned. To come up for rejoinder, if any, as well as arguments on 25.02.2022 before the D.B.



(Mian Muhammad)
Member (E)


(Salah-Ud-Din)
Member (J)

12.01.2022

Mr. Haider Ali, (junior of learned counsel for the appellant) present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondent present.

Former made a request for adjournment on the ground that senior counsel for the appellant is busy before Hon'ble Peshawar High Court, Bannu Bench. Adjourned. Case to come up for arguments before the D.B on 02.02.2022.


(Atiq-ur-Rehman Wazir)
Member(E)


Chairman

Noted: Counsel for the Appellant.

15-11-21

21.01.2021

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 19.04.2021 before S.B.

Appellant Deposited
Security & Process Fee ▶



(Rozina Rehman)
Member (J)

19.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 10.06.2021 for the same as before.



Reader

10.06.2021

Junior to counsel for the appellant and Wisal H.C alongwith Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Representative of the respondents seeks further time to furnish reply/comments. Respondents are directed to submit written reply/comments in office within 10 days, 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 27.10.2021 before the D.B.

Stipulated period has
passed and reply has
not been submitted.



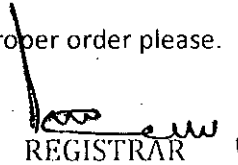


Chairman

Form- A.

FORM OF ORDER SHEET

Court of _____

Case No.- 11014 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/09/2020	<p>The appeal of Mr. Shabbir Hussain Shah presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>05/11/2020</u></p> <p> CHAIRMAN</p>
05.11.2020		<p>Junior counsel for appellant is present.</p> <p>Since the Members of the High Court as well as of the District Bar Association, Peshawar, are observing strike today, therefore, learned senior counsel for appellant is not available today. Adjourned to 21.01.2021 on which date to come up for preliminary hearing before S.B.</p> <p> (Muhammad Jamal Khan) Member (Judicial)</p>

SCANNED
KPST
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. / /2020

SHABBIR HUSSAIN SHAH

VS

POLICE DEPTT:

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APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10371

Dated 17/9/2020

APPEAL NO. 11014 /2020

Mr. Shabir Hussain Shah, Deputy Superintendent of Police (BPS-17),
Bannu Region, District Bannu.

..... **APPELLANT**

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Additional Inspector General of Police (Establishment), Khyber Pakhtunkhwa, Peshawar.
- 3- The Deputy Inspector General of Police, Bannu Region, District Bannu.

..... **RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT REGULARLY PROMOTING THE APPELLANT TO THE RANK OF DEPUTY SUPERINTENDENT (BPS-17) W-E-F 24-01-2014 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the respondents may kindly be directed to considered the appellant for regular promotion to the Rank Deputy Superintendent (BPS-17) w-e-f 24-01-2014 i.e. w.e.f. the date when appellant colleagues and junior colleagues were promoted with all back benefits including seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHWETH:

ON FACTS:

1. That the appellant was appointed in the respondent department and was confirmed as Assistant Sub Inspector w-e-f his appointment vide order dated 30-12-1998. Copy of the order dated 30-12-1998 is attached as annexure.....A.
2. That vide Range Selection Board meeting and decision dated 13-07-2001 the appellant was brought on list "E" w-e-f 13-07-2001 vide order dated 20-07-2001. Copy of the minutes

Filed to-day

Registrar

17/9/2020

of the meeting and order dated 20-07-2001 are attached as annexure.....**B&C.**

3. That it is pertinent to mention here that due to satisfactory performance the appellant was considered for promotion as officiating Sub Inspector by the Range Selection Board in the D.P.C meeting dated 07-10-2004 vide order dated 20-10-2004. Copy of the order dated 20-10-2004 is attached as annexure.....**D.**
4. That performing his duty with zeal and zest and with whole heartedly the appellant was considered suitable for the promotion in the Substantive rank of Sub-Inspector by the Range Selection Board in it meeting dated 26-08-2007 and was promoted as Sub-Inspector vide order dated 08-10-2007. Copy of the order dated 08-10-2007 is attached as annexure.....**E.**
5. That after satisfactorily completion of his probation period, the appellant was confirmed w-e-f 08-10-2007 vide order dated 04-03-2011. Copy of the order dated 04-03-2011 is attached as annexure.....**F.**
6. That it is worth to mention here that DPC meetings held on 26-03-2008 and 01-04-2008 to examine the suitable Sub-Inspectors for inclusion to the promotion list 'F'. That no recommendations have been made against the appellant. Copy of the letter dated 05-04-2008 regarding recommendation is attached as annexure.....**G.**
7. That it is important to mention here that appellant was not considered/ not recommended for inclusion his name into the promotion list "F" due to his suspension in a criminal case lodged against the appellant. Copy of the letter dated 29-04-2008 and order dated 07-05-2008 regarding non-recommendation of the appellant to promotion list "F" are attached as annexure**H.**
8. That due to the alleged involvement in the criminal case FIR No. 38 dated 11-03-2008, the appellant was suspended and later on was compulsory retired from service vide order dated 28-04-2008. Feeling aggrieved the appellant preferred departmental appeal followed by the Service Appeal No. 1133/2008 which was decided on 19-12-2008 in favour of the appellant and the appellant was reinstated in to service with all back benefits. Copy of the judgment dated 19-12-2008 is attached as annexure.....**I.**
9. That after reinstatement of the appellant, he presented the judgment of the this august service tribunal with a representation before the respondents and the respondent

No. 3 vide a letter dated 06-05-2009 requested to the respondent No. 1 for inclusion of his name in the promotion list "F" with retrospective date with his colleagues for the appellant due seniority. Copies of the relevant documents and letter dated 06-05-2009 are attached as annexure.....J.

10. That vide order dated 18-08-2015 the appellant was promoted the rank of Deputy Superintendent of Police (BPS-17) with immediate effect. Copy of the order dated 18-08-2015 is attached as annexure.....K.

11. That it is important to mention here that appellant was reinstated by this august tribunal with all back benefits vide judgment mentioned above but the respondents did not count his period of service w-e-f his suspension till reinstatement. That feeling aggrieved the appellant approached the respondents and verbally informed about this illegality and irregularity on the part of the respondents.

12. That respondents finally issued the impugned seniority list of the DSPs (BPS 17) vide dated 30-04-2020 and disturbed the position of the appellant but the same is due to the inaction of the respondents by not including the name of the appellant in the promotion list "F" with the retrospective date with his colleagues for the purpose of seniority. Copy of the seniority list date 30-04-2020 is attached as annexure.....L.

13. That feeling aggrieved from the impugned order dated 18-08-2015 the appellant preferred departmental appeal before the respondents but the same has not been responded with in the statutory period of ninety days. Copy of the departmental appeal is attached as annexure.....M.

14. That having no other remedy the appellant preferred the instant appeal on the following grounds amongst others.

GROUND:

A- That impugned order dated 18-08-2015 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/rectified to the extent of the appellant be promoted w-e-f 24-01-2014 with all back benefits.

B- That appellant has not been treated by the respondent Department in accordance with law and rules 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 treatment meted out to the appellant is clearly based on discrimination and malafide and as such the respondents violated the principle of natural justice.
- D- That appellant is fully entitled to be promoted on his turn w-e-f 06-02-2014 with his colleagues in light of the section 9 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989.
- E- That appellant is also entitled for his ante dated promotion w-e-f 24-01-2014 with all back benefits.
- F- That the respondents acted in arbitrary and malafide manner while issuing the impugned promotion order dated 18-08-2015.
- G- That respondents violated Article 38(e) of the Constitution of Islamic Republic of Pakistan 1973, according to which state is bound to eliminate disparity in the income and earning of individuals including persons in the services of the Federation, thus in light of the above quoted Article of the Constitution the respondents are duty bound to modify/rectify the impugned promotion order and the appellant be promoted anti-dated with all back benefits.
- H- 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 very graciously be accepted as prayed for, please.

Dated: 14-09-2020

APPELLANT



SHABIR HUSSAIN SHAH

THROUGH:



NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

&



MIR ZAMAN SAEI
ADVOCATES

BETTER COPY

(6)

POLICE DEPTT.

ORDER

On successful completion of their probationer period, the following probationer Asst: Sub-Inspectors or Bannu rang, are confirmed w.e. from the date of appointment as noted against each:-

S:No.	Name & Number	District	Date
1-	PASI AZMAT ALI NO.7/B	BANNU DIST:	
2-	HANIFULLAH KHAN NO. 11/B	-DO-	11.1.1995
3-	FARIDULLAH KHAN 23/B	DO	DO
4-	MUSTAFA KAMAL PASH 49/B	DO	DO
5-	MOHAMMAD TAHIR KHAN 75/B	DO	DO
6-	MOHAMMAD TAHIR SHAH 75/B	DO	DO
7-	NISAR MOHAMMAD KHAN 17/B	LAKKI DIST:	DO
8-	ISMATULLAH KHAN 29/B	DO	DO
9-	SHABIR HUSSAIN SHAH,77/B	DO	DO
10-	ZAFRULLAH KHAN NO.78/B	DO	DO

TARIK UMAR KHITAB
Dy inspector general of police
Bannu Range, Bannu

No.3161-62/ES
Dated 30.12.1998

mb

POLICE DEPT.

Police Department

O R D E R .

A - (6)

On successful completion of their Probationary Period, the following Probationer Asstt. Sub-Inspectors of Bannu Range, are conferred s.e. from the date of appointment,

as noted against each:-

<u>S: NO.</u>	<u>Name & Number.</u>	<u>District.</u>	<u>Date.</u>
1.	PASI Azmat Ali No. 7/E	Bannu Distt.	
2.	" Hanifullah Khan No. 11/B	-do-	11.1. 1935
3.	" Faridullah Khan 23/E	-do-	-do-
4.	" Mustafa Kamsal Bakh 49/B	-do-	-do-
5.	" Mohammed Tahir Khan 50/B	-do-	-do-
6.	" Mohammad Tahir Shah 75/E	-do-	-do-
7.	" Nisar Mohammad Khan 17/B	Lakki Distt.	-do-
8.	" Ismatullah Khan 29/E	-do-	-do-
9.	" Shabir Hussain Shah 77/B	-do-	-do-
10.	" Zafrullah Khan No. 78/B.	-do-	-do-

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

No. 3161-62 /ES.

Dated 30-12-1938.

Copies to the:-

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

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

BETTER COPY - 7

BOARD HEAD ON 13.07.2001 RANGE SELECTION

A meeting of the Range selection Board was hold in police range office, Bannu, on 13.7.2001 and attended by the following:-

- 1- Mr, Abid SaeedChairman
By Inspector General of Police, Bannu Range, Bannu.
- 2- Mr. Mohammad Haroon Khan Afridi,.....Member.
Superintendent of Police, Bannu.
- 3- Mr. Faeih-Ud-Din,.....Member.
Superintendent of police, Lakki Mawrat.

All the cases were decided at length and decisions passed by the Range Selection Board are as under:-

1) PROMOTION OF HEAD CONSTABLE LIST "D" AS OFFICIATING ASST: SUB-INSPECTOR

There were 3 vacancies of Offg: asstt: Sub-Inspectors. In order to fill up these vacancies, the record of the following head constables of List 'D' were checked and the selection taken are noted against each:-

- 1) H.C Mohammad Bashir, No.527, of Bannu Distt:..... Approved.
- 2) H.C Tajamul Shah, No.323 of Bannu Distt:.....Approved.
- 3) H.C Abdur Rahim No.1096 of Bannu Distt:.....Approved.

2) PROMOTION OF ASST: SUB-INSPECTOR F LIST "" AS ASST:SUB INSPECTOR SELCTION GRADE FROM BPS-9 TO 11.

There were 4 vacancies of Selection Grade Asstt: Sub Inspectors in Bannu Range. In order to fill-up the vacancies, the record of the following asstt: Sub-Inspectors, on promotion list "F" were checked and the decisions taken are noted against each.:-

- 1) ASI Bakht Jamal, No.9/B, Of Bannu Distt:.....Approved.
- 2) " Sher Daraz, No.19/B, Of Bannu Distt:.....Approved.
- 3) " Saadullah, No.14/B, of Bannu Distt:.....Ignored.
due to 1- different record.
- 4) " Gul Feraz, No. 15/B.....Approved.
- 5) Mohammad Akbar, 15/B.....Approved.

(NEXT SHEET)

ADVISORY BOARD

A meeting of the Advisory Board, held at Police Range Office, Bannu, on ... following :-

- 1. Mr. Abul Saad, Dy. Inspector of Police, Bannu Range, Chairman.
- 2. Mr. ... Superintendent of Police, Bannu, Member.
- 3. Mr. ... Superintendent of Police, Bannu, Member.

passed by the Range Selection Committee

1) REVISION OF LIST OF APPLICANTS FOR POSTS OF CONSTABLES

There were 3 vacancies in the post of Constables. In order to fill-up these vacancies, a list of 100 Constables of list ... are noted against each :-

- 1) M. S. Mohammad ...
- 2) " Rajanul ...
- 3) " Abdur ...

2) REVISION OF LIST OF APPLICANTS FOR POSTS OF INSPECTORS

There were 4 vacancies in the post of Inspectors in Bannu Range. In order to fill-up these vacancies, a list of 100 Inspectors of list ... were checked and the following ...

- 1) ASI ...
- 2) " ...
- 3) " ...
- 4) " ...
- 5) " ...

3) **INCLUSION OF THE NAME OF CONFIRMED ASST:SUB-INSPECTORS IN PROMOTION LIST "F"**

There were 13 vacancies of confirmed Asstt: Sub-Inspectors in Bannu Range. In Order to fill-up the vacancies, the record of the following confirmed Asstt: Sub-Inspectors, were checked and the decisions taken are noted against each:-

- ASI Niser Mohammad, No.17/B of Lakki Distt:.....Approved.
1. " Hanifullah, No.11/B, Of Bannu Distt:.....Approved.
 2. " Mohammad Tahir, No.5/B of Bannu.....Approved.
 3. " Mujeeb Ur Rehman, No. 21/B of Bannu distt:.....Approved.
 4. " Mustafa Kama pasha, No. /B of Bannu distt:.....Approved.
 5. Asmat Ali Khan, No.7/B of bannu Distt:.....Approved.
 6. Zafrullah khan, No. of Lakki Distt:.....Approved.
 7. Mohammad Shefqat, No.1/B Of Bannu distt:.....Approved.
 8. Mohammad Tahir Shah, No.75/B, of bannu distt:.....Approved.
 9. **Shabir Hussain Shah, No.77/B, of Lakki Distt:.....Approved.**
 10. Faridullah khan, No.3/B, of bannu distt:.....Approved.
 11. Afresayab Hassan, No.76/B on deputationApproved to S.B/ FP

4) **CONFIRMATION OF OFFICIATING ASST:SUB-INSPECTOR ON PROMOTION LIST "D" IN HIS SUBSTANTIVE RANK OF ASST:SUB-INSPECTOR.**

There were 4 vacancies in the substantive rank of Asst: Sub-Inspector. In order to filled the vacancies, the record of the following Offg: Asstt: Sub-Inspector of "D" list were checked and the decisions taken are noted against each:-

- 1) OASI Sakhi Zaman, No. 1098 transferred to D.I Khan ...ignored due to different record.
- 2) " Amanullah khan, No.1099, of Bannu Distt:.....Approved.
- 3) " Imtiaz khan, No.18 of Bannu Distt:.....Approved.
- 4) " Atlas khan, No.89/B, of Bannu distt:.....Approved.
- 5) OASI Mohammad shafiq, distt lakki.....approved.

(ABID ZAHID)

Dy: Inspector General of police,
Bannu Range, Bannu.

3)

CONFIRMATION OF DECISIONS

1 There were 13 witnesses in Khamu Buzo. In order of the following confirmed the decisions given are:

- 1) ABE
- 2) " Kanihu Lab,
- 3) " "
- 4) " "
- 5) " "
- 6) " "
- 7) " "
- 8) " "
- 9) " "
- 10) " "
- 11) " "
- 12) " Afecayob

4)

CONFIRMATION OF DECISIONS OF FIELD OFFICERS

There were 4 witnesses sub-Inspector. In order of the following officers and the decisions:

- 1) O. J. ...
- 2) " Armani
- 3) " ...
- 4) " Atlas Khun,

9

5) CASI Moha...

1955

M. Moran

M. K. ...

ADDA TO GOVERNOR KHAS (PRIDE)
Commissioner of Police, Chand.

Sub-Commissioner of Police,
Lahore

APPROVED

M

O R D E R .

C-10

Names of the following Asstt:Sub-Inspectors of Bannu Range are brought on list " B " with effect from 13.07.2001:-

Sl. No.	Name, rank & No. of Officers.	District.
1.	ASI Nisar Mohammad, No. 17/B.	Lakki Marwat.
2.	" Hanifullah, No. 11/B.	Bannu.
3.	" Mohammad Tahir, No. 50/B.	Bannu.
4.	" Mujeeb-ur-Rehman, No. 39/B.	Bannu.
5.	" Mustafa Kamal Pasha, No. 49/B.	Bannu.
6.	" Azmat Ali Khan, No. 7/B.	Bannu.
7.	" Zafrullah Khan, No. 78/B.	Lakki Marwat.
8.	" Mohammad Shafiqat, No. 1/B.	Bannu.
9.	" Mohammad Tahir Shah, No. 75/B.	Bannu.
10.	" Shabir Hussain Shah, No. 77/B.	Lakki Marwat.
11.	" Faridullah Khan, No. 23/B.	Bannu.
12.	" Afrasayab Hassan, No. 76/B. On deputation to S.B./NWFP.	

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

No. 1891-94 /ES

Dated Bannu, the 20-7-2001.

Copies forwarded for information and necessary action to :-

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

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

D-11

POLICE DEPTT.:

BANNU REGION.

O_R_D_E_R.

The following Asstt; sub; Inspectors on promotion list "B" have been considered suitable for promotion as Offg; sub; Inspectors by the Range Selection Board, in the D.P.C., meeting, held in Range Office, Bannu on 7.10.2004.

On promotion, they are posted to the Distts; as noted against each; -

<u>S/No.</u>	<u>Name & No.</u>	<u>place of posting.</u>
1)	OSI, Gul Faraz, 4/B.	L.B.I/Lakki Distt;..
2)	" , Abul Kalam, 25/B.	L.B.I/Lakki Distt;..
3)	" , Mustafa Kamel pasha, 49/B.	B.B.I/Bannu Distt;..
4)	" , Azmat Ali Khan, 7/B.	B.B.I/Bannu Distt;..
5)	" , Zafirullah Khan, 78/B.	Operation staff, Lakki.
6)	" , Shabir Hussain Shah, 77/B.	L.B.I/Lakki Distt;..
7)	" , Faridullah, 23/B.	L.B.I/Lakki Distt;..
8)	" , Afra'syab Hassam, 76/B.	B.B.I/Bannu Distt;..
9)	" , Habib Khan, 22/B.	B.B.I/Bannu Distt;..
10)	" , Mohammad Iqbal, 28/B.	
11)	" , Haq Nawaz, 30/B.	L.B.I/Lakki Distt;..

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

Necessary gazette notification may be issued to all concerned.

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

No. 2928-32 / EC Dated Bannu, the 20-10-2004.

copy to :-

- 1). The provincial police officer, NWFP, Peshawar.
- 2). The DY: Inspector General of police, S/branch, Pesh.
- 3). The Asstt; Inspector General of police, Traffic, NWFP.
- 4). The DPOs, Bannu & Lakki. For information &
- 5). The D. SS.P/Inv: Bannu & Lakki. and necessary action.

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

FOR PUBLICATION IN THE NWFP POLICE GAZETTE
PART-II ORDER BY THE DISTRICT POLICE OFFICER
LAKKI MARWAT.

NOTIFICATION.

No. 22-12- /2004.

No. 7232 /LAKKI:-PROMOTION:- The following ASIs of list "P"
of this District were promoted to the rank of Off:SI from the date as
noted against their names:-

- 1) Abdul Kalam 25/B on 27.11.2004.
- 2) Zafrullah Khan 78/B on 27.10.2004.
- 3) Shabir Hussain Shah 77/B on 04.11.2004.
- 4) Haq Nawaz 30/E on 27.11.2004.

Asad
District Police Officer,
Lakki Marwat.

ORDER.

The D.P.C- has considered the following Offg: Sub:Inspectors on promotion list "E" of Bannu Region suitable for promotion in the substantive rank of Sub:Inspectors in its meeting, held on 26.8.2007. They shall remain on a probation period for two-years from the date of issuance of this notification.

On promotion to the substantive rank, they are allotted the following Range Numbers as noted against each:-

Necessary Gazette notification be issued under intimation to all concerned.

<u>S:No.</u>	<u>Name with Old No.</u>	<u>Allotted Regional Nos.</u>
1).	OSI, Muhammad Hayat, 7/B.	B/23.
2).	OSI, Mir Qasim, 33/B.	B/21.
3).	OSI, Muhammad Ismail, 8/B.	B/2.
4).	OSI, Shabir Hussain Shah, 77/B.	B/4.
5).	OSI, Muhammad Iqbal, 28/B.	B/5.

(AMIR HAMZA MAHSUD)
P.S.P.

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

No. 2413-18 /EC Dt: Bannu, the 8-10-107.

Copy to :-

- 1). The Provincial Police Officer, NWFP, Pesh: for information
- 2). The Dy:Inspector General of Police, Spl:Branch, NWFP, Pesh:.
- 3). The Distt: Police Officer, Bannu & Lakki for inf: & n/actio
- 4). The Supdt: of Police, Invest: Bannu for information.
- 5). The Confidential Clerk-Regional Office, Bannu.

(AMIR HAMZA MAHSUD)
P.S.P.

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

151

From : The Inspector General of Police,
Bannu Region, Bannu.

To : The Provincial Police Officer,
N.W.F.P., Peshawar.

No. 461 /EC Dt: Bannu, the 23-2-08.

Subject: RECOMMENDATION ROLL OF CONFIRMED
SUB: INSPECTORS.

MEMORANDUM.

Kindly refer to C.P.O., Peshawar signal No. 1568-78/E-II, dated 23.1.2008 and signal No. 2878-84/E-II, dated 11.2.2008.

The Recommendation Rolls in Form 13.15 (I) alongwith Service Rolls, Fauji-Missal and Character Rolls for promotion to list "F" in r/o the following confirmed/substantively-promoted Sub:Inspectors are submitted herewith on the prescribed proforma, as desired, please:-

S:No.	Name and No.	CI:Rolls.	S:Rolls.	S:Books.	F:Missal.	Remarks.
1).	SI, Saadullah, B/7.	1	1	1	1	Promoted to the substantive rank of Sub:Insp: under PR:13.18 w.e.from 25.08.2006.
2).	SI, Nisar Muhammad, B/15.	1	1	2	-	- do -
3).	SI Muhammad Tahir Shah, B/3.	1	1	2	-	- do -
4).	SI Mir Qasim, B/21.	1	1	2	-	Promoted to the substantive rank of Sub:Insp: under PR:13.18 w.e.from 08.10.2007.
5).	SI Muhammad Ismail, B/2.	1	1	2	1	- do -
6).	SI Shabir Hussain Shah, B/4.	1	1	2	1	- do -

(AMIR HAMZA NAHSUD) PSP,
By: Inspector General of Police,
Bannu Region, Bannu.

[Signature]

5-13/2011
POLICE DEPTT:


F-15
BANNU REGION.

ORDER.

On completion of their 2 years probation period successfully, the following Sub Inspectors of Bannu Region are hereby confirmed with effect from 08.10.2007, under Police Rules 13-18.

1. SI (Now Inspector) Mohammad Ismail, 8/B.
2. SI (Now Inspector) Shabir Hussain Shah. 77/B.

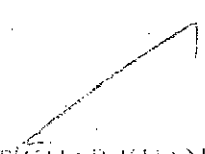
Necessary Gazette Notification may be issued accordingly.


IFTIKHAR KHAN
P.S.P

Regional Police Officer,
Bannu Region, Bannu.

No. 689 /EC, dated Bannu the 4/03 /2011.

Copy to the District Police Officer, Bannu for information and necessary action w/r to his Memo: No.1833 dated 26.02.2011.


IFTIKHAR KHAN
P.S.P

Regional Police Officer,
Bannu Region, Bannu.

Better Copy-*g*

16

From : The Provincial Police Officer,
NWFP, Peshawar.

To : The Capital City Police Officer,
Peshawar.

The Deputy Inspectors General of Police,
Mardan & Bannu Region.

7084-86
No.1152-53/EC DC: Bannu, The *3/04/2008*.

SUBJECT: ADMISSION TO PROMOTION LIST "F" AND PROMOTION AS OFFG: INSPECTORS

Memo

The cases for inclusion in promotion list "F" as well as promotion as Offg: inspectors of the following Sub Inspectors of your Region have been examined in DPC meeting held on 26.03.2008 & 01.04.2008 and observation made are noted against each:-

S#	Name & Number	Home District	Recommendations
1.	SI Mir Qasim No. B/21	Bannu	DIG/Bannu Region has forwarded the case of SI on prescribed from under Police Rules but has not been made any recommendation. The DIG decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.
2.	SI Muhammad Ismail No. B/02	Lakki	DIG/Bannu Region has forwarded the case of SI on prescribed from under Police Rules but has not been made any recommendation. The DIG decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.
3.	SI Shabir Hussain Shah No. B/04	Bannu	DIG/Bannu Region has forwarded the case of SI on prescribed from under Police Rules but has not been made any recommendation. The DIG decided to ask him as to whether he recommended his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.

The needful may be done within stipulated period.

13/08

Dy No 589/EC

Date 12/4/08

From The Provincial Police Officer, NWFP, Peshawar.

To The Capital City Police Officer, Peshawar.

The Deputy Inspectors General of Police, Mardan & Bannu Region

No. 7084-86/E-II dated Peshawar the 05.4.2008.

G-16

Subject ADMISSION TO PROMOTION LIST "F" AND PROMOTION AS OFFG. INSPECTOR

Memo.

The cases for inclusion to promotion list "F" as well as promotion as Offg. Inspector of the following Sub Inspectors of your Region have been examined in DPC meeting held on 26.03.2008 & 01.04.2008 and observation made are noted against each

EE
Pw mfa.

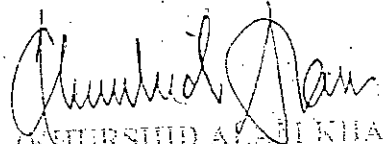
SI 4 Bannu
10/4

S/No	Name & Number	Home District	Recommendation
1.	SI Mir Qasim No. B/21	Bannu	DIG Bannu Region has forwarded the case of SI on prescribed form under Police Rule but has not made any recommendation. The DPC decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.
2.	SI Muhammad Ismail No. B/02	Lakki	DIG Bannu Region has forwarded the case of SI on prescribed form under Police Rule but has not made any recommendation. The DPC decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.
3.	SI Shabir Hussain Shah No. B/04	Lakki	DIG Bannu Region has forwarded the case of SI on prescribed form under Police Rule but has not made any recommendation. The DPC decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.
4.	SI Muhammad Saeed No. MR/59	Mardan	DIG Mardan Region has forwarded the case of SI on prescribed form under Police Rule but has not made any recommendation. The DPC decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.
5.	SI Hamsheerullah No. P/25	Nowshera	Capital City Police Officer has forwarded the case of SI on prescribed form under Police Rule but has not made any recommendation. The DPC decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.
6.	SI Anwar Gul No. P/32	Peshawar	Capital City Police Officer has forwarded the case of SI on prescribed form under Police Rule but has not made any recommendation. The DPC decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.

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7.	SI Muhammad Kamal No. P/37	Charsadda	Capital City Police Officer has forwarded the case of SI on prescribed form under Police Rule but has not made any recommendation. The DPC decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.
8.	SI Muhammad Atiq Shah No. P/45	Charsadda	Capital City Police Officer has forwarded the case of SI on prescribed form under Police Rule but has not made any recommendation. The DPC decided to ask him as to whether he recommends his name for inclusion to promotion list "F" or otherwise. Reply should be reached to this office within 7 days after issuance of the letter.

The needful may be done within stipulated period.



(KHURSHID A. ALI KHAN)

Add: IGP/HQRS.

For Provincial Police Officer,
NWFP, Peshawar.

From: - The District Police Officer, Bannu.

To: - The Dy: Inspector General of Police
Bannu Region, Bannu.

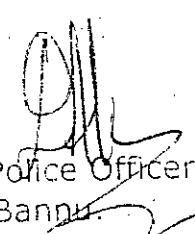
No: - 3720 /Dated Bannu the, 29/04/2008.


Subject: - ADMISSION TO PROMOTION LIST "F"
AND PROMOTION AS OFFG: INSPECTORS.

Memo:- Kindly refer to your memo No: 970 dated
17.04.2008.

The following SIs are not recommended for inclusion
their names to promotion list "F".

1. SI Mir Qasim No:B/21
2. SI Muhammad Ismail No:B/02
3. SI Shabir Hussain Shah No:B/04


District Police Officer,
Bannu.

EC
For m. achr:


D 10/1324
29/4

29/4/08
Dy I G Bannu

I-20

BEFORE THE NWFP SERVICE TRIBUNAL PESHAWAR.



Appeal No. 1133/2008

Date of institution - 19.08.2008
Date of decision - 19.12.2008

Shabbir Hussain Ex-Sub Inspector, operation Staff
Bannu.....(Appellant)

VERSUS

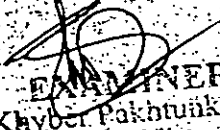
1. Provincial Police Officer, NWFP Peshawar.
2. Regional Police Officer Bannu.
3. District Police Officer, Bannu.....(Respondents)

Appeal u/s 4 of the NWFP Service Tribunals Act 1974 r/w Section 10 of the NWFP Removal from Service (Special Powers) Ordinance 2000 against order dated 28.4.2008 communicated to the appellant on 9.5.2008 whereby the appellant has been awarded major penalty of compulsory retirement from service, against which the departmental appeal dated 16.5.2008 was rejected vide order dated 25.7.2008.

Mr. Ijaz Anwar, Advocate.....For appellant.
Mr. Ghulam Mustafa, A.G.P.....For respondents.

MR. NOOR-UL-HAQ.....MEMBER.
SYED MANZOOR ALI SHAH.....MEMBER.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

JUDGMENT.


NOOR-UL-HAQ, MEMBER :- This appeal has been filed by the appellant against the order dated 28.4.2008 communicated to the appellant on 9.5.2008, whereby he has been awarded major penalty of compulsory

21

retirement from service. He has prayed that the impugned orders may be set aside and he be re-instated in service with all back benefits

Brief facts of the case are that the appellant was appointed as A.S.I in the Police force. During the course of his service, the appellant was promoted as S.I and his case was recently referred for promotion/enlistment in List "F". The appellant while posted as SHO Basi Khel was suspended from Service on 11.3.2008. He was served with a charge sheet alongwith statement of allegations dated 17.3.2008 containing the allegations that "he while posted to Police Station Basi Khel was found in league with flour/grain smugglers which is evident, crystal clear from the version of case FIR No. 38 dated 11.3.2008 in which a number of bags of flour were recovered on the spot and the involved persons were arrested red handed by DSP/Saddar". The appellant duly replied the charge sheet and refuted the allegations. The Inquiry Officer conducted the departmental inquiry and the Inquiry Officer quite wrongly claimed to have proved the charges. The appellant was served with a show cause notice and ^{he} refuted the allegations. Without considering the replies/defence of the appellant vide the order dated 28.4.2008 communicated to the appellant on 9.5.2008 the appellant has been awarded the major penalty of Compulsory retirement from service. The appellant preferred a departmental appeal dated 16.5.2008, which has been regretted order dated 25.7.2008.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

22

The respondents were summoned. They appeared through their respective representative and submitted joint written reply, contested the appeal and denied the claim of the appellant.

Arguments heard and record perused.

The learned counsel for the appellant argued that the very charge sheet was defective because in the charge sheet reference was made to the FIR No. 65 dated 11.3.2008 and it was alleged that the appellant was in league with the floor grain smugglers. The learned counsel for the appellant further argued that registration of FIR is mere an information made to the police authorities for initiating an action, thus mere information cannot be considered as a proof of the allegations. The learned counsel also argued that in the FIR or in the investigation no such connection/league of the appellant with the alleged smugglers was proved nor any where the appellant is named. The learned counsel next argued that the enquiry report was defective because the Inquiry Officer on the one hand alleged that there is no direct evidence on record that the appellant is in league with the smugglers but gave findings against the appellant on mere presumptions. The learned counsel further argued that mere framing of charge sheet and initiating departmental proceedings does not suffice for the proof of charges, he stressed that it is the evidence on record/produced in the inquiry that has to be sifted before the verdict of guilt is be pronounced by the Inquiry Officer, he was of the view that if it is ignored than the departmental proceedings will be a mere device of

ATTESTED

[Signature]


EXAMINED
Member Pakfunkhwa
Service Tribunal,
Peshawar

being away with the services of an employee. The learned counsel made reference specifically to the PW Sanaullah Khan DSP who in his cross

examination has admitted that he has got no evidence whereby it can be alleged that the appellant is in league with the grain smugglers. The said PW also admitted that there are other routes from where one has to pass through different police stations before reaching the disputed place. The learned counsel carry us to all the prosecution witnesses and argued that nothing material has been brought against the appellant during the course of inquiry. To substantiate his arguments the learned counsel for the appellant relied on 2004 PLC (CS) page 1293, 2002 PLC (CS) page 136, 2002 PLC (CS) page 255 and PLD 1989 SC page 335.

Replying to the arguments the Government Pleader argued that there is no defect in the departmental proceedings and that this Tribunal can see only defects if any in the conduct of the proceedings. The appellant was given sufficient opportunity of defence, he was given the right to cross examine the witnesses, the learned AGP further argued that presence of huge quantity of Atta is sufficient proof of the charges, he was of the view that the appellant has been leniently dealt with while imposing the penalty of compulsory retirement from service.

ATTESTED


 ATTESTER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

After hearing the arguments of both sides and perusal of the record, the Tribunal is of the view that the appellant was charged for his alleged league with the food grain smugglers. In support of the charge the prosecution examined six witnesses, while the appellant produced two witnesses in his defence. The main prosecution witness is Mr. Sanullah, he narrated the facts and in cross examination admitted that there is no

direct evidence connecting the appellant with the charges, the other witnesses did not utter a single word against the appellant. The inquiry officer concluded that the charges stand established against the appellant, however, we have examined the statement/record and could not find any incriminating evidence against the appellant, thus finding of the Inquiry Officer is based on mere presumption. The inquiry proceedings are quasi-criminal proceedings requiring establishment of misconduct on the basis of some positive evidence, because on any such defective findings a whole service career of an employee cannot be ruined. The August Supreme Court of Pakistan in a case reported in PLD 1989 SC page 335 held that "Conjecture or suspicion cannot take place the proof of fact". In the case reported in PLC 2004 (CS) page 1293 it was held that "nature and conduct of departmental inquiry, was not a confidential matter, and thus record must show involvement/association of the accused civil servant with the commissioned misdeeds". In the case reported in PLC 2002 (CS) 136 it was held that there was no cogent or convincing incriminating evidence to establish the allegation against the accused official, it was further held that mere framing of charge sheet, holding of enquiry and issuance of show cause notice does not mean that the allegations stand proved, and that it is the evidence which is placed on the record is to be sifted in order to arrive at a just decision in the matter and one should not be held guilty in a blind folded manner. We relying upon the above precedent cases and hold that there is no convincing incriminating evidence where by the inquiry officer could have held the accused official as in league with the smugglers. There is another aspect of the case, ^{i.e.} mere presence/recovery of

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

25

the Atta/food grain with in the vicinity of the P.S Basya Khel cannot be considered as a strong piece of evidence regarding the guilt of the accused, because it was proved on record that there are four to five routes from where the recovered atta could have reached there. The witnesses have also proved that due to prevailing law and order situation in District Bannu from 2.00 P.M till 8.00 P.M there is no naka bandi, thus there can be different possibilities and probabilities of reaching the atta with in the vicinity of P.S Basya Khel, therefore, mere recovery of atta cannot be made basis for the imposition of major penalty of compulsory retirement from service.

The upshot of the above discussion is that the order of compulsory retirement dated 28.4.2008 is not based on positive evidence and we therefore, set aside the impugned order dated 28.4.2008 and reinstate the appellant in service with all back benefits. No order as to costs. File be consigned to the record.

ANNOUNCED
19.12.2008

(SYED MANZOOR ALI SHAH)
MEMBER

(NOOR-UL-HAQ)
MEMBER

Certified to be true copy

EX-100
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 25-8-2020
Number of Words 2400
Copying Fee 26.00
Urgent —
Name of Copy 26.00
Date of Completion of Copy 27-8-2020
Date of Delivery of Copy 27-8-2020

BETTER COPY OF PAGE-26

From: The Regional Police Officer,
Bannu Region, Bannu.

To: The Provincial Police Officer,
N.W.F.P, Peshawar

No.1752/HC Dt: Bannu, the 01/05/2009

Subject: **PROMOTION**
Memorandum.

Kindly refer to C.P.O, Peshawar,

Memo Nio. 12952/E-II dated 01/05/2009.

It is submitted that afresh recommendation Roll in form 13.15 (1) alongwith Service record in respect of Sub: Inspecto, Shabbir Hussain Shah No.77/B, Operation Staff, Bannu, received through DPO/Bannu vide his memo: No. 7055 dated 26.05.2009 (copy enclosed) are submitted herewith for kind perusal and consideration as desired, please.

(M.MASOOD KHAN AFRIDI)

P.S.P

Regional Police Officer,
Bannu Region, Bannu

J-26

From : The Regional Police Officer,
Jammu Region, Jammu.

To : The Provincial Police Officer,
Jammu Region, Jammu.

No. 1752 / M. No. 1/05 / 109.

Subject: Transfer of Staff
to Jammu.

Kindly refer to P.O. No. 12952/J-11 dated 25.5.2009.

It is requested that a fresh demand draft Roll in form 13.15 (A) be issued and heard in respect of Sub-Inspector, (M) in Staff, No. 77/B, Jammu Staff, Jammu, received under DEO/Jammu vide his letter No. 7055 dated 25.5.2009 (copy enclosed) and submitted herewith for kind perusal and consideration as desired, please.

(H. MANOJ : AN ARISE)

Regional Police Officer,
Jammu Region, Jammu.

30/5/09

PHONE NO. 091-9210545

FAX NO. 091-9210927

From : The Provincial Police Officer,
N.W.F.P. Peshawar

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

No. 12952 /E-II, dated Peshawar, the 21 / 5 / 2009.

Subject: REPRESENTATION

Memo:

Please refer to your Memo: No. 1493/EC, dated 06.05.2009.

SI Shabir Hussain No. 77/B alongwith SI Mir Qasim and
Muhammad Ismail were not recommended for inclusion their names into
list 'F' vide your office Memo: No. 1152/EC dated 07.05.2009.

However, if DIG of Police Bannu Region deems him fit for
inclusion of his name to list 'F' he should submit his recommendation
afresh in this regard.

(MLAN KHURSHID ANWAR)

AIG/Legal

For Provincial Police Officer,
N.W.F.P. Peshawar

RP/EO/EC

RPD Bannu
21/5/09

Sir
PPS
Attached

J
21/5/09

DYD No 1525
DT 21/5/09

27

From : The Regional Police Officer,
Bannu Region, Bannu.

To : The Provincial Police Officer,
N.W.F.P., Peshawar.

No. 1493 / MC Pt: Bannu, the 6/05/09.

Subject: PROMOTION LIST.

MEMORANDUM.

It is submitted that a representation, submitted by Sub: Insp: Mubir Hussain, No. 77/B, presently posted at PS: Kakki, through DPO/Bannu vide Memo: No. 437, dated 22.4.2009 (copy enclosed), requesting their inclusion due seniority and bringing his name on promotion list with his colleagues from the retrospective date is submitted herewith for your kind perusal and consideration please.

Moreover, the decision of the Honourable Service Tribunal with regard to his reinstatement with all back benefits is also enclosed, please.

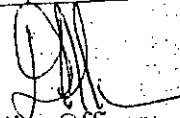
(M. MASOOD SHAMAFRIDI)
P.S.F.
Regional Police Officer,
Bannu Region, Bannu.

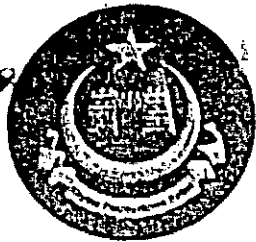
4/5/09

ICE DEPARTMENT

PROFORMA FOR RECOMMENDATION FOR PROMOTION TO LIST "F"

NO.	NAME, REGION NO.	HOME DISTRICT	DATE OF BIRTH	DATE OF ENLISTMENT	EDUCATIONAL QUALIFICATION	DATE OF PASSING UPPER SCHOOL COURSE	DATE OF POSTING AS SHO NAME OF DISTT. AND PS	DATE OF POSTING IN SB, CB, PTC CID	DATE OF CONFIRMATION AS SI/ DATE OF PROMOTION TO THE SUBSTANTIVE RANK OF SI	NO OBJECTION CERTIFICATE
	Mohammad Tahir Shah B/3	Bannu	1-03-1972	11-1-1995	B.A.	08-05-1999	(1) SHO Basya Khel (24.7.2004) (2) SHO Saddar (24.9.2004) (3) SHO Mandan (12.01.2008)	D/O Posting in PTC: (01-09-95)	25-8-2006	There is no departmental proceeding against him
	Nisar Khan No. B/15	Lakki	20-01-1973	09-01-1975	B.A.	13-10-1999	(1) SHO Kakki (21.07.2004) (2) SHO City (21.05.2005) (3) SHO, Kakki (26.8.2006) (4) SHO Domel (29-11-2006.) (4) SHO Cantt (22-11-2007.	D/O posting in SB: (15.7.2000)	25-8-2006	There is no departmental proceeding against him
	Mir Qasim Khan B/21	Bannu.	04-01-1961	05-10-1980	F.A.	13-12-2001	Nil	D/O Posting in SB: (11.5.2002)	08-10-2007	There is no departmental proceeding against him
	Mohammad Ismail B/21	Lakki	6-7-1985	06-07-1985	Middle	18-12-2002	(1) SHO Kakki (01.3.2007) (2) SHO Mandan (26.3.2007) (3) SHO Haved (2.8.2007)	D/O Posting in PTC: (01.07.1995)	08-10-2007	There is no departmental proceeding against him
5.	Shabir Hussain Shah B/4	Lakki	15-6-1972	11-01-1995	M.A.	20-01-2001	(1) SHO Domel (2.9.2006) (2) SHO G- Wala (27.9.2006) (3) SHO Cantt (02.03.2007) (4) SHO Cantt (09.05.2007.) (5) SHO, Basya khel (22.11.2007)		08-10-2007	There is no departmental proceeding against him


 District Police Officer,
 Bannu



S. 84 11-17-15

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

K-30

Dated Peshawar 13 August, 2015

NOTIFICATION

No. 3206 /SE-I, In pursuance of the provision contained in Section-5 of the Khyber Pakhtunkhwa (Promotion of Superintendent of Police and Deputy Superintendent of Police) Rules-2007, the Competent Authority i.e. Provincial Police Officer on recommendations of the Departmental Selection Committee meeting held on 05th August 2015 is pleased to promote the following Inspectors BS-16 Executive Khyber Pakhtunkhwa Police to the Rank of Deputy Superintendent of Police BS-17 on regular basis with immediate effect.

The Officer on promotion shall remain on probation for a period of one year in terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

Their promotion will take effect from the date they actually assumed their charge of higher responsibility:

S. No.	Name & No.
1.	Mr. Muhammad Ilyas No. MR/64 He will complete his period mentioned in Standing Order No. 21/2014
2.	Mr. Shabbir Hussain Shah No. P/77
3.	Mr. Sona Khan No. K/39
4.	Mr. Aqiq Hussain No. K/17
5.	Mr. Shaukat Ali Shah No. K/94
6.	Mr. Khalid Usman No. K/61

Their transfer/posting Notification will be issued separately.

Sd/-
NASIR KHAN DURRANI
Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. & date even.

Copy forwarded to the:-

- Chief Secretary Government of Khyber Pakhtunkhwa Peshawar.
- Secretary to Governor Khyber Pakhtunkhwa Peshawar.
- Secretary to Chief Minister Khyber Pakhtunkhwa Peshawar.
- Secretary Government of Khyber Pakhtunkhwa Esstt: Department Peshawar.
- Secretary Government of Khyber Pakhtunkhwa Finance Department Peshawar.
- Secretary Government of Khyber Pakhtunkhwa Home & T.A.s Department Peshawar.
- All Addl: Inspectors General of Police in Khyber Pakhtunkhwa Peshawar.
- DIG of Police, CTD Khyber Pakhtunkhwa Peshawar.
- Accountant General Khyber Pakhtunkhwa Peshawar.
- Commandant PTC Hangu & FRP.
- All Regional Police Officers in Khyber Pakhtunkhwa.
- DIG of Police HQrs., Training & E & I Khyber Pakhtunkhwa Peshawar.
- PSO to IGP Khyber Pakhtunkhwa Peshawar.
- PRO to IGP Khyber Pakhtunkhwa Peshawar.
- Registrar Central Police Office, Peshawar.
- Supdt: Secret, Supdt: Estb: II, III & Carrier Planning CPO Peshawar.
- U.O.P File.

ASIF IQBAL MOHMAND
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

SENIORITY LIST OF DSsP BS-17 OF KHYBER PAKHTUNKHWA POLICE

Dated, 30,04,2020

No. 840

/SE-I, The Seniority List of DSsP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned.

S.No.	Name of Officers	Date of Birth	Domicile	Qual.	D.O. Promotion as DSP	Promotion of Notification	Remarks
1.	Mr. Bakht Zada	15.02.1962	Buner	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	Revised seniority was granted vide Notification No. CPO/E-II/Revised Seniority/142/E-II dated 29.04.2020
2.	Mr. Amjid Ali	18.03.1963	Swat	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	Revised seniority was granted vide Notification No. CPO/E-II/Revised Seniority/142/E-II dated 29.04.2020
3.	Mr. Arif Javed	08.02.1964	Haripur	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	Appointed as (SP BS -18) on Acting Charge Basis vide Govt: of Khyber Pakhtunkhwa Establishment Department Notification No. SO (E-1) E&AD/2-4/2019, dated 28 th January 2019.
4.	Mr. Aman Ullah	09.07.1964	Bannu	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	Appointed as (SP BS -18) on Acting Charge Basis vide Govt: of Khyber Pakhtunkhwa Establishment Department Notification No. SO (E-1) E&AD/2-4/2019, dated 28 th January 2019.
5.	Mr. Tariq Mehmood	28.04.1965	Abbottabad	BA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
6.	Mr. Ijaz Ahmed	15.06.1966	Abbottabad	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
7.	Mr. Janas Khan	10.02.1965	Abbottabad	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
8.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	FA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
9.	Mr. Muhammad Suleman	28.07.1970	Mansehra	MA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
10.	Mr. Asif Gohar	07.08.1964	Mansehra	10 th	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
11.	Mr. Aamir Shahzad	09.08.1968	Peshawar	MA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
12.	Mr. Amir Muhammad Khan	07.01.1970	Buner	BA	19.03.2012	Notification No S /1957/2012 dt: 19.03.2012	
13.	Mr. Sanaullah	10.01.1969	Lakki	BA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	Revised seniority was granted vide Notification No. CPO/E-II/Revised Seniority/ 33, dated 27.01.2020.
14.	Mr. Gul Naseeb	09.11.1968	Bannu	F.Sc	19.03.2012	Notification No S /1957/2012 dt: 19.03.2012	
15.	Mr. Waqar Ahmad	03.01.1968	Nowshera	BA	19.03.2012	Notification No S /1957/2012 dt: 19.03.2012	
16.	Mr. Nasir Khan	20.12.1972	Peshawar	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. CPO/E-II/Revised Seniority/ 34, dated 27.01.2020.
17.	Mr. Muhammad Shafiq	13.01.1963	Bannu	BA	19.03.2012	Notification No S /1957/2012 dt: 19.03.2012	
18.	Mr. Muhammad Arif	10.03.1969	Peshawar	MA/LLB	19.03.2012	Notification No S /6949/2012 dt: 25.09.2012	
19.	Mr. Tahir ur Rahman	28.02.1969	Haripur	BA	19.03.2012	Notification No S /1957/2012 dt: 19.03.2012	
20.	Mr. Darvesh Khan	14.06.1962	Mardan	MA/LLB	19.03.2012	Notification No S /1957/2012 dt: 19.03.2012	
21.	Mr. Tauheed Khan	20.10.1963	DIKhan	BA	19.03.2012	Notification No. S/8083/2012 dt: 07.11.2012	
22.	Mr. Salah-ud-Din	15.01.1970	Tank	MA	07.11.2012	Notification No. S/2383/2012 dt: 31.03.2012	
23.	Mr. Noor Jamal	10.01.1966	Mardan	MA	31.03.2012	Notification No. S/8083/2012 dt: 07.11.2012	
24.	Mr. Muhammad Arif	22.04.1964	Bannu	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
25.	Mr. Tariq Habib	05.09.1968	Peshawar	MA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
26.	Mr. Nisar Ahmad	02.11.1973	Charsadda	BA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
27.	Mr. Nisar Ahmad	01.03.1977	Bannu	MA/LLB	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	

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S.No	Name of Officers	Date of Birth	Domicile	Qual.	D.O Promotion as DSP	Promotion of Notification	Remarks
28.	Mr. Tariq Iqbal	13.04.1974	Peshawar	M.Sc/LLB	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
29.	Mr. Qaid Kamal	01.01.1963	Charsadda	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
30.	Mr. Banaras Khan	05.01.1962	Nowshera	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
31.	Mr. Shafiullah	01.04.1971	DIKhan	MA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
32.	Mr. Munir Hussain	30.05.1966	Mansehra	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
33.	Mr. Tahir Iqbal	20.01.1969	Haripur	B.Sc	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	Revised seniority was granted vide Order No. 909/E-II dated 12.12.2018
34.	Mr. Qamar Hayat	08.04.1971	Haripur	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
35.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	BA	25.03.2013	Notification No. S/1791/2013 dt: 25.03.2013	
36.	Mr. Nazir Ahmad	02.02.1970	Abbottabad	MA/B.Ed	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
37.	Mr. Saeed Akhtar	02.02.1971	Haripur	M.Sc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
38.	Mr. Muhammad Ayaz	03.03.1975	Abbottabad	B.Sc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
39.	Muhammad Jamil Akhtar	22.02.1977	Haripur	B.Sc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
40.	Mr. Falak Niaz	01.04.1965	Swabi	MA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
41.	Mr. Ishtiaq Ahmad	01.11.1971	Lakki	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
42.	Mr. Ifikhar Shah	30.04.1966	Mardan	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.575/CPB dated 19.05.2017
43.	Mr. Shaukat Ali	05.03.1971	Swabi	B.Sc	30.11.2012	Notification No. S/8772/2012 dt: 30.11.2012	
44.	Mr. Abdul Samad	14.04.1969	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
45.	Mr. Mushtaq Ahmad	15.03.1970	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
46.	Mr. Sajjad Ahmad	01.04.1968	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
47.	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	10 th	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
48.	Mr. Muzamil Shah	08.03.1972	Swabi	M.A	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
49.	Mr. Niaz Muhammad	11.02.1971	Swabi	MA/LLB	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
50.	Mr. Shah Hassan	01.05.1968	Mardan	MA	08.04.2013	Notification No. S/2119/13 dt: 08.04.2013	
51.	Sajjad Ahmad Sahibzada	02.02.1971	Swabi	BA	08.04.2013	Notification No. S/2119/13 dt: 08.04.2013	
52.	Mr. Nazir Khan	18.10.1970	Mardan	MA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
53.	Mr. Abdul Hai	01.08.1972	D.I.Khan	MA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
54.	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	FA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
55.	Muhammad Javed	03.06.1963	Mansehra	10 th	27.10.2015	Notification No. 4029/SE-I dt: 27.10.2015	Revised seniority was granted vide Notification No. 110/SE-I dated 17.01.2019. Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
56.	Mr. Zia Hassan	01.11.1974	DIKhan	M.A/ Pol	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
57.	Mr. Abdus Salam Khalid	24.06.1976	Lakki	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
58.	Arbab Shafiullah Jan	09.10.1966	Peshawar	BA	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
59.	Mr. Rafiullah	12.03.1968	Peshawar	FA	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
60.	Mr. Muhammad Naeem	10.10.1960	MKD	10 th	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
61.	Mr. Muhammad Khalid	01.01.1970	Chitral	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
62.	Syed Inayat Ali Shah	10.01.1972	D.I.Khan	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
63.	Mr. Niaz Gul	07.03.1971	Abbottabad	B.Sc	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	

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S.No.	Name of Officers	Date of Birth	Domicile	Qual.	D.O Promotion as DSP	Promotion of Notification	Remarks
64.	Mr. Muhammad Ishtiaq	04.05.1973	Mansehra	B.Sc	24.01.2014	Notification No. S/418/14; dt: 24.01.2014 [*]	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
65.	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	M.Sc	08.04.2016	Notification No. 373/SE-I dt: 08.04.2016	
66.	Syed Mukhtiar Shah	18.10.1967	Haripur	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
67.	Muhammad Tahir Shah	01.03.1972	Bannu	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
68.	Mr. Nisar Muhammad	20.01.1973	Lakki	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
69.	Mr. Noor Zamin Shah	30.01.1962	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
70.	Mr. Khan Khel	10.04.1969	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
71.	Muhammad Aleem Jan	11.04.1967	Peshawar	B.Sc	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
72.	Mr. Tajamul Khan	30.09.1965	Swabi	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
73.	Mr. Hameedullah	25.04.1974	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
74.	Mr. Taj Malook	10.04.1961	Swabi	FA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
(75)	Muhammad Atiq Shah	01.09.1978	Charsadda	FA	06.02.2014 ←	Notification No. S/677/14 dt: 06.02.2014.	
76.	Mr. Zar Wali	20.01.1961	Peshawar	FA	06.02.2014	Notification No. S/677/14 dt: 06.02.2014.	
77.	Mr. Ijaz Ahmad	05.04.1963	Mansehra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
78.	Mr. Arshad Mehmood	15.08.1964	Mansehra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
79.	Mr. Shakeel Ahmad	14.04.1969	Charsadda	BSc	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
80.	Mr. Muhammad Saeed	04.05.1969	Mardan	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
81.	Mr. Khabir Muhammad	01.01.1972	Abbottabad	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
82.	Ms. Nazia Naureen	01.12.1970	Abbottabad	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
83.	Mrs. Shahzadi Noshad	10.04.1972	Hangu	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
84.	Mr. Rahim Hussain	11.05.1970	Shangla	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
85.	Mr. Amjad Hussain	24.03.1971	Mansehra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
86.	Mr. Rizwan Habib	19.04.1974	Mansehra	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
87.	Mr. Jehangir Khan	10.11.1965	Abbottabad	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
88.	Mr. Rahmat Ullah	05.03.1971	Nowshera	FA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
89.	Mr. Rashid Iqbal	15.01.1974	Mardan	MSc	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
90.	Mr. Alamzeb	12.02.1980	Mardan	F.Sc	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
91.	Mr. Zahir Shah	01.04.1962	Buner	FA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
92.	Mr. Zafar Khan	10.01.1963	Buner	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
93.	Mr. Asad Mehmood	08.03.1968	Swabi	BA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
94.	Mr. Muzakir Shah	01.06.1961	Dir Lower	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
95.	Mr. Muhammad Aslam	08.04.1962	Karak	F.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
96.	Mr. Safdar Khan	30.04.1971	Kohat	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
97.	Mr. Murad Ali	09.01.1973	Bannu	F.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
98.	Mr. Mujeeb Ur Rehman	02.04.1969	Bannu	BA/LLB	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
99.	Ms. Ancela Naz	09.10.1971	Peshawar	M.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
100.	Ms. Asmat Ara	15.04.1975	Swabi	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
101.	Mrs. Shazia Shahid	30.04.1976	Charsadda	MA/LLB	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
102.	Mrs. Rozia Altaf	30.07.1969	Peshawar	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
103.	Ms. Hamida Bano	04.12.1970	Peshawar	BA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
104.	Ms. Afsana Zahid	01.09.1969	Bannu	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	

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S.No	Name of Officers	Date of Birth	Domicile	Qual	D.O. Promotion as DSP	Promotion of Notification	Remarks
105.	Mr. Azmat Ali Khan	06.01.1970	Bannu	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
106.	Mr. Waqar Ahmad	12.04.1974	Charsadda	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
107.	Mr. Sajjad Hussain	23.03.1976	Nowshera	B.Sc	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
108.	Mr. Yasir Aman	11.08.1970	Peshawar	D.Com	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
109.	Mr. Muhammad Maroof	05.10.1974	Abbottabad	B.Sc	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
110.	Mr. Usman Ghani	09.07.1960	Peshawar	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
111.	Mr. Ali Gohar	23.03.1968	K. Agency	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
112.	Muhammad Ilyas	25.12.1973	Mardan	B.A	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
113.	Mr. Rokhan Zeb	07.04.1965	Swabi	B.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
114.	Mr. Fazal Dad	16.03.1966	Charsadda	M.A/LLB	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	Revised seniority was granted vide Notification No. 911/E-II dated 12.12.2018
115.	Mr. Janzada	01.04.1963	Charsadda	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
116.	Mr. Naseer Ali	03.10.1975	Charsadda	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
117.	Mr. Muhammad Rauf	04.04.1963	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
118.	Mr. Hidayat Ullah shah	20.04.1965	Swabi	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
119.	Mr. Muhammad Ismail	12.06.1966	Lakki	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
120.	Mr. Shakeel Ahmed	12.01.1974	Peshawar	FA	30.12.2019	Notification No.1723/SE-I dt: 30.12.2019	Revised seniority was granted in compliance with the judgment of Honorable Khybc: Pakhtunkhwa Service Tribunal in Service Appeal No.626/2018, vide order dated 13.02.2019 and Execution Petition No.157/2019, dated 10.05.2019 and DSC minutes held on 01.07.2019
121.	Mr. Shabir Hussain Shah	15.06.1972	Lakki	MA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
122.	Mr. Aqiq Hussain	01.04.1965	Kohat	BA/LLB	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
123.	Mr. Falak Nawaz	03.02.1969	Kohat	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
124.	Mr. Shoukat Ali Shah	09.10.1960	Kohat	10th	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
125.	Mr. Afsar Khan	30.01.1961	Karak	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
126.	Mr. Khalid Usman	06.01.1967	Karak	FA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
127.	Mr. Gharib Nawaz	06.09.1961	Karak	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
128.	Mr. Muhammad Sattar Khan	04.04.1964	Chitral	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
129.	Mr. Muhammad Zaman	01.01.1965	Buner	B.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	

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S.No	Name of Officers	Date of Birth	Domicile	Qual	DO Promotion as DSP	Promotion of Notification	Remarks
131.	Mr. Muhammad Fayaz	07.03.1974	Mardan	FA	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Re-instated in Service with all back benefits. Order No. S5323/19 dated 28.06.2019
132.	Mr. Amir Hussain	25.05.1965	Swabi	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
133.	Mr. Gran Ullah	15.06.1963	Charsadda	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
134.	Mr. Fazal Wahid	12.01.1971	Malakand	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
135.	Mr. Gohar Ali	15.11.1974	Peshawar	BSc	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
136.	Mr. Riaz Khan	03.02.1975	Peshawar	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
137.	Mr. Izhar Shah	06.03.1966	Mardan	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
138.	Mr. Habib Ur Rehman	04.03.1966	Mansehra	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
139.	Mr. Aurang Zeb	05.01.1970	Mansehra	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
140.	Mr. Shah Nawaz	08.08.1965	Mansehra	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
141.	Mr. Muhammad Altaf	12.03.1969	Haripur	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
142.	Mr. Amjid Ali	24.04.1969	Swabi	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
143.	Mr. Sher Rehman	05.04.1964	Mardan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
144.	Mr. Khalid Mehnood	21.05.1961	Abbottabad	B.A	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
145.	Mr. Riaz Muhammad	10.12.1962	Swabi	FA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
146.	Mr. Iftikhar Ali Shah	11.05.1976	Bannu	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
147.	Mr. Murad Ali	13.04.1965	Charsadda	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
148.	Mr. Ziarat Gul	05.10.1960	Charsadda	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
149.	Mr. Naseer Khan	01.04.1962	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
150.	Mr. Arab Nawaz	11.02.1969	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
151.	Mr. Inayatullah	11.04.1962	Peshawar	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
152.	Mr. Muhammad Yaseen	30.03.1975	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
153.	Mr. Zahoor-Ud- Din Khan	05.05.1963	D.I.Khan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
154.	Mr. Sawab Gul	12.04.1961	Mardan	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
155.	Mr. Muhammad Ijaz Khan	01.09.1977	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
156.	Mr. Shaheen Shah Gohar	03.03.1971	Charsadda	BA	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
157.	Mr. Sajjad Haider	20.04.1970	Abbottabad	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
158.	Mr. Ibrar Khan	20.05.1970	Abbottabad	FA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
159.	Mr. Arshad Khan	30.05.1974	Peshawar	F.Sc	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
160.	Mr. Muhammad Khrushid	12.01.1963	Mansehra	10th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
161.	Mr. Muhammad Yaseen	28.12.1973	Haripur	BA	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
162.	Mr. Iftikhar Ahmad	10.05.1968	Mansehra	BA	14.03.2017	Notification No. 231/SE-I dt: 14.03.2017	
163.	Mr. Zakir Hussain	09.03.1966	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
164.	Mrs. Samina Zafar	25.12.1975	Haripur	10th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
165.	Mr. Bashir Ahmad	11.05.1962	Haripur	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
166.	Mr. Mehboob	16.12.1965	Abbottabad	10 th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
167.	Mr. Jamil-ur-Rehman	16.04.1974	Abbottabad	BA	12.03.2018	Notification No. 274/SE-I dt: 12.03.2018	
168.	Mr. Shahid Adnan	27.03.1973	D.I.Khan	MA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	

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SE-I

S.No.	Name of Officers	Date of Birth	Domicile	Qual	D.O Promotion as DSP	Promotion of Notification	Remarks
170.	Mr. Muhammad Hamayun	01.04.1963	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
171.	Mr. Ashiq Hussain	06.12.1960	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
172.	Mr. Mukhtar Ahmad	06.04.1962	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
173.	Mr. Adalat Khan	04.08.1960	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
174.	Mr. Ghulam Muhammad	01.11.1963	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
175.	Mr. Muhammad Nabi	09.10.1966	Charsadda	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
176.	Mr. Ayaz Mehmood	20.02.1971	Mardan	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
177.	Mr. Shah Muntaz	20.02.1965	Dir Lower	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
178.	Mr. Zafar Ahmad	10.01.1979	Chitral	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
179.	Mr. Farmanullah	27.10.1978	Dir Lower	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
180.	Mr. Muslim Khan	16.02.1970	Mardan	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
181.	Mr. Said Rahim	08.02.1962	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
182.	Mr. Hukam Khan	14.03.1969	Charsadda	MA.LLB	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
183.	Mr. Wilayat Khan	20.12.1960	Peshawar	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
184.	Mr. Mehar Ali	01.01.1969	Nowshera	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
185.	Mr. Yar Nawab	05.11.1963	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
186.	Mr. Ifikhar Ali	10.02.1968	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
187.	Mr. Nasir Khan	22.11.1968	Charsadda	MA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
188.	Mr. Noor Zaman	21.08.1961	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
189.	Mr. Hazrat Ullah	05.01.1964	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
190.	Mr. Liaqat Ali	08.04.1964	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
191.	Mr. Mehmood Nawaz	07.03.1974	Lakki	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
192.	Mr. Muhammad Yousaf	10.02.1961	DI Khan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
193.	Mr. Umar Daraz Khan	11.08.1961	D.I.Khan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
194.	Mr. Bashir Dad	14.04.1972	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
195.	Mr. Roshan Zeb	16.02.1964	Mardan	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
196.	Mr. Gul Sheed	01.06.1980	Charsadda	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
197.	Mr. Taj Malook	10.02.1961	Charsadda	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
198.	Mr. Muhammad Saddique	16.11.1968	Abbottabad	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
199.	Mr. Abdur Rehman	17.11.1960	Peshawar	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
200.	Mr. Samin Jan	06.03.1961	Peshawar	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
201.	Mr. Tayyab Jan	01.05.1970	Charsadda	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
202.	Mr. Fazal Subhan	02.05.1968	Nowshera	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
203.	Mr. Alam Zeb	10.11.1963	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
204.	Mr. Saeed Khan	15.04.1964	Peshawar	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
205.	Mr. Noor Ullah	10.05.1964	Peshawar	D.Com	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
206.	Mr. Muhammad Ishaq	21.12.1968	Nowshera	F.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	Revised seniority was granted vide Notification No. 632/SE-I dated 30.05.2019
207.	Mr. Pasham Gul	29.04.1963	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
208.	Mr. Mukhtiar Ahmad	03.12.1964	Charsadda	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
209.	Mr. Zahir ur Rehman	10.01.1962	Shangla	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
210.	Mr. Sher Afsar	09.02.1963	Swabi	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
211.	Mr. Asad Zubair	15.01.1980	Kohat	F.Sc	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
		01.02.1960	DI Khan	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	

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S.No.	Name of Officers	Date of Birth	Domicile	Qual	D.U. Promotion as DSP	Promotion of Notification	Remarks
	Tariq						
213.	Mr. Fazal Wahid	01.12.1968	Mardan	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
214.	Mr. Amir Nawaz	20.03.1970	Charsadda	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
215.	Mr. Liaqat Khan	10.06.1962	Peshawar	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
216.	Mr. Muhammad Shoaib	29.03.1962	Mardan	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
217.	Mr. Afsar Zaman	01.09.1969	Mardan	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
218.	Mr. Abdur Rashid	03.05.1968	Charsadda	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
219.	Mr. Khalid Khan	02.01.1969	Nowshera	MA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
220.	Mr. Niaz Muhammad	14.09.1973	Charsadda	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
221.	Mr. Allama Iqbal	05.03.1979	Charsadda	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
222.	Mr. Tauheed Ullah	08.04.1982	Charsadda	MA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
223.	Mr. Faqir Hussain	02.02.1967	Peshawar	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
224.	Mr. Zahid Khan	08.04.1967	Mkd. Agency	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
225.	Mr. Badshah Hazrat	15.02.1969	Dir Lower	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
226.	Mr. Naveed Iqbal	13.03.1981	Swat	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
227.	Mr. Ajmal Khan	15.05.1982	Mkd: Agency	F.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
228.	Mr. Ghulam Sadiq	01.02.1968	Mkd: Agency	B.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
229.	Mr. Muhammad Irfan	01.08.1970	Karak	B.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
230.	Mr. Saifullah Khan	08.08.1959	Kohat	M.Sc/ LLB	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
231.	Mr. Hussain Ghulam	10.03.1970	Hangu	F.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
232.	Mr. Muhammad Iqbal	11.02.1963	Manshra	10th	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
233.	Mr. Farhad Ali	16.11.1962	Mardan	10th	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
234.	Mr. Azam Ali Shah	01.01.1963	Abbottabad	10th	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
235.	Mr. Arshad Hussain	15.05.1967	Shangla	10th	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	

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Salman Choudhry 36/4.
 (SALMAN CHOUDHRY) PSP
 Deputy Inspector General of Police, HQrs.,
 For Inspector General of Police,
 Khyber Pakhtunkhwa,
 Peshawar

Endst: No. & date even.
 Copy to all concerned

To

The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

M-37

Subject: **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED SENIORITY LIST DATED 30.04.2020 WHEREBY THE SENIORITY OF THE APPELLANT HAS NOT BEEN CONSIDERED W.E.F 28.04.2008**

RESPECTED SIR,

With due respect it is stated that the appellant was appointed before your good self Department and was confirmed as Assistant Sub Inspector w-e-f his appointment vide order dated 30-12-1998. That vide Range Selection Board meeting and decision dated 13-07-2001 the appellant was brought on list "E" w-e-f 13-07-2001 vide order dated 20-07-2001. That due to satisfactory performance the appellant was considered for promotion as Officiating Sub Inspector by the Range Selection Board in the D.P.C meeting dated 07-10-2004 vide order dated 20-10-2004. That the appellant performing his duty with zeal and zest and with whole heartedly was considered suitable for the promotion in the Substantive rank of Sub-Inspector by the Range Selection Board in its meeting dated 26-08-2007 and was promoted as Sub-Inspector vide order dated 08-10-2007. That after satisfactorily completion of his probation period, the appellant was confirmed w-e-f 08-10-2007 vide order dated 04-03-2011. That it is worth to mention here that DPC meetings held on 26-03-2008 and 01-04-2008 to examine the suitable Sub-Inspectors for inclusion to the promotion list 'F'. That no recommendations have been made against the appellant. That it is important to mention here that appellant was not considered/ not recommended for inclusion his name into the promotion list "F" due to his suspension in a criminal case lodged against the appellant. That due to the alleged involvement in the criminal case FIR No. 38 dated 11-03-2008, the appellant was suspended and later on was compulsory retired from service vide order dated 28-04-2008. Feeling aggrieved the appellant preferred departmental appeal followed by the Service Appeal No. 1133/2008 which was decided on 19-12-2008 in favour of the appellant and the appellant was re-instated in to service with all back benefits. That after re-instatement of the appellant, he presented the judgment of the august service tribunal with a representation before the concerned authority and the DIG Bannu Region vide a letter dated 06-05-2009 requested to your good self for inclusion of my name in the promotion list "F" with retrospective date with other colleagues for the appellant due seniority. That vide order dated 18-08-2015 the appellant was promoted to the rank of Deputy Superintendent of Police (BPS-17) but with immediate effect. That finally the concerned authority issued the impugned seniority list of the DSPs (BPS-17) vide dated 30.04.2020 and disturbed the position of the appellant but the same is due to the inaction of the concerned authority by not including the name of appellant in the promotion list "F" with the retrospective date with his colleagues for the

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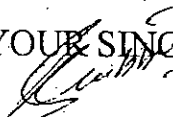
37/A

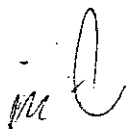
purpose of seniority. That appellant feeling aggrieved from the impugned seniority list dated 30.04.2020 preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned seniority list dated 30.04.2020 may very kindly be modified/rectified to the extent that the seniority of appellant be counted/considered w.e.f. 28.04.2008 with all back benefits.

Dated. 26.05.2020.

YOUR SINCERELY


SHABIR HUSSAIN SHAH, DSP
Bannu Region, District Bannu



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

Service Appeal No. 11014/ 2020

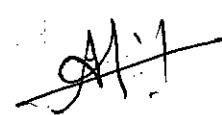
Shabbir Hussain Shah..... (Appellant)

VERSUS

IGP, Govt: of KP and others.....(Respondents)

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DEPONENT

11101-1483421-1

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

Service Appeal No. 11014/ 2020

Shabbir Hussain Shah..... (Appellant)

VERSUS

IGP, Govt: of KP and others.....(Respondents)

REPLY BY RESPONDENTS NO. 1, 2 & 3

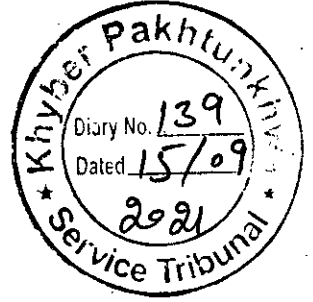
RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the appeal is badly barred by law & limitation.
- b) That the appeal is not based on facts.
- c) That the appeal is not maintainable in the present form.
- d) That the appeal is bad for miss-joinder and non-joinder of necessary parties.
- e) That the appellant is estopped to file the appeal by his own conduct.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.
- g) That the appellant has got no cause of action to file instant service appeal.

REPLY ON FACTS:-

1. Pertains to record. Hence, needs no comments
2. Pertains to record. Hence, needs no comments.
3. Pertains to record. Hence, needs no comments.
4. Correct to the extent that the appellant was considered for promotion in routine as SI subject to seniority cum fitness and qualifying of required training/ courses.
5. Correct. However, as per rules confirmation in rank of SI was required from the date on which he completed probation period and not from date of officiating promotion.
6. Correct to the extent that DPC meetings held on dated 26.03.2008 & 01.04.2008, examined the suitable sub-inspectors for inclusion to the promotion on list F but the appellant was indulged in case FIR No. 38 dated 11.03.2008, (annexure-A) he was suspended and a proper departmental enquiry initiated against him in the findings of which was he proved guilty and resultantly, compulsory retired from service on 28.04.2008(annexure-B).



The decision of DPC is based on facts/ rules/ Policy. The appellant was compulsory retired from service on the charges of corruption by District Police Officer, Bannu on 28.04.2008 and subsequently reinstated on 19.12.2008(annexure-C) in compliance of Tribunal judgment. During this period he was required to get good ACR and was not recommended by Regional Police Officer, Bannu for inclusion of his name in List 'F' which is necessary under Police Rules 13-15(1)(annexure-D).

7. Correct to the extent that the name of appellant was not considered for inclusion his name into list F due to his suspension in above stated criminal case and pending of departmental enquiry. Detail reply already given in para No.6.
8. Correct. Already explained in para no.6 above .
9. Pertains to record. Para No. 6 is comprehensive in this regard.
10. Pertains to record. Appellant was promoted against the available vacant post in accordance with prevailing rules.
11. Correct to the extent that SI Shabbir Hussain Shah No. B/04 was compulsory retired from service vide District Police Officer, Bannu Order No. 3681-83, dated 28.04.2008, and later on reinstated into service upon the decision of Khyber Pakhtunkhwa Service Tribunal in Service Appeal No. 1133/ 2008 dated 19.12.2008. The recommendation rolls of the Sub-Inspectors of Bannu Region were submitted to CPO vide No. 3097/ EC, dated 06.07.2009 (annexure-E) for admission into List 'F' and promotion as Offg: Inspector wherein, the status of SI Shabbir Hussain Shah was shown as "UNDER ENQUIRY". Furthermore, the issue is due to late inclusion of his name into List 'F' and promotion as Offg: Inspector.
12. Correct to the extent that impugned seniority list of DSPs was issued dated 30.04.2020(annexure-F) whereby, the position of the appellant was in accordance with his recommendation roll for inclusion into List 'F'.
13. As explained in Para 11.moreover his seniority list was fixed on merit, and the appellant also submitted his departmental appeal very late i.e. 26.05.2020 (annexure-G) and no other application/ representation was received to CPO with in statutory time.
14. The appellant has wrongly challenged the legal/ valid order of respondents through unsound Grounds.


REPLY ON GROUNDS:-


- A. Incorrect. The impugned order and acts of respondent are in accordance with law/ rules and no malafide is existing on the part of respondents, hence appellant is not entitled.
- B. Incorrect. For any relief the appellant has been treated in accordance with law/ rules and no violation of Constitution of Islamic Republic of Pakistan has been done by respondents.
- C. Incorrect. The treatment met out to the appellant is clearly based in accordance with law/ rules and no discrimination or violation has been done by the answering respondents.
- D. Incorrect. As already explained in Facts.
- E. Incorrect. As already explained in preceding Paras.
- F. Incorrect. As already explained in preceding Paras.
- G. Incorrect. Already explained in facts.
- H. The respondents may also be allowed to raise additional Grounds at the time of hearing of the instant Service Appeal.

PRAYER:-

Keeping in view the above stated facts and grounds it is humbly prayed that the appeal being not maintainable, may kindly be dismissed with costs, please.

**Regional Police Officer,
Bannu Region, Bannu.
(Respondent No. 3)**


**Addl: Inspector General of Police,
(Establishment) Khyber
Pakhtunkhwa, Peshawar.
(Respondent No. 2)**


**Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 1)**

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

Service Appeal No. 11014/2020

Shabbir Hussain Shah..... (Appellant)

VERSUS

IGP, Govt: of KP and others.....(Respondents)

AFFIDAVIT

I, Muhammad Farooq Khan, DSP Legal representative for Respondent Nos. 1, 2 & 3, do hereby solemnly affirm and declare that the contents of the accompanying comments submitted by me are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.


DEPONENT

11101-1483421-1

ATTESTED



15-09-2021

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

Service Appeal No. 11014/ 2020

Shabbir Hussain Shah..... (Appellant)

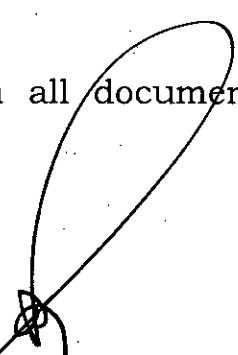
VERSUS

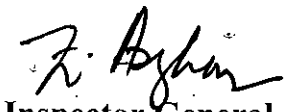
IGP, Govt: of KP and others.....(Respondents)


AUTHORITY LETTER.

Mr. Muhammad Farooq Khan, DSP Legal Bannu, is hereby authorized to appear before The Service Tribunal Khyber Pakhtunkhwa Peshawar on behalf of the undersigned in the above cited case.

He is authorized to submit and sign all documents pertaining to the present appeal.


Regional Police Officer,
Bannu Region, Bannu.
(Respondent No. 3)


Addl: Inspector General of Police,
(Establishment) Khyber
Pakhtunkhwa, Peshawar.
(Respondent No. 2)


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

27/10/21

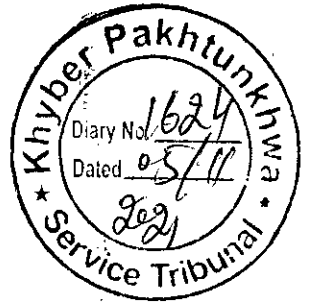
DB II

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

C.M NO: _____/2021

IN

APPEAL No. 11014/2020



*Put up to the court
along with copy of
the...
[Signature]
[Signature]*

SHABIR HUSSAIN SHAH

VS

POLICE DEPT.

**APPLICATION FOR EARLY HEARING OF THE ABOVE
TITLE APPEAL.**

R/SHEWETH:

- 1) That the captioned service appeal is pending adjudication before this Hon'ble tribunal which is fixed for 25-02-2022 for hearing.
- 2) That appellant has filed the above mentioned service appeal for his anti-dated promotion.
- 3) That the respondents have already submitted there para wise comments in the instant appeal and it is a ripe case, and by not considering the appellant from the due date for promotion an irreparable loss is occurring to the appellant.
- 4) That it is in the interest of justice that the captioned case be accelerated to an early date.

*Fix in 2nd week of
Jan, 2022.
1-2-12/11/22
[Signature]*

It is, therefore, most humbly prayed that on acceptance of this application the mentioned appeal may be requisition for early hearing.

APPLICANT

SHABIR HUSSAIN SHAH

THROUGH:

**NOOR MUHAMMAD KHATTAK
ADVOCATE**

[Signature]

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2020

Shabbir Hussain Shah

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Police Deptt.

(RESPONDENT)
(DEFENDANT)

I/We *Shabbir Hussain Shah*

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2020

Shabbir

CLIENT

ACCEPTED
NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

MIR ZAMAN SAFI

&

AFRASIAB KHAN WAZIR
ADVOCATES

OFFICE:

Flat No.4, 2nd Floor, Juma Khan
Plaza, near FATA Secretariat,
Warsak Road, Peshawar.
Mobile No.0345-9383141