

19th April, 2023

1. Counsel for the appellant present. Mr. Muhammad Jan,
District Attorney for the respondents present.

2. Learned counsel for the appellant seeks time to submit
rejoinder. He may do so within 10 days. To come up for arguments
on 21.06.2023 before the D.B. P.P given to the parties.

SCANNED
KFST
PESHAWAR


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

Fazle Subhan P.S

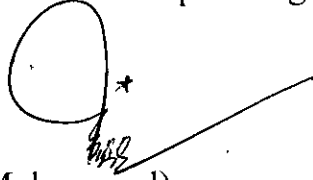
22.11.2022

Appellant alongwith his counsel present. Mr. Muhammad Jan,
District Attorney for official respondents present.

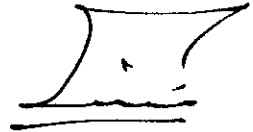
Arguments could not be heard due to paucity of time.

Adjourned. To come up for arguments on 10.01.2023 before the D.B.

SCANNED
KPST
Peshawar



(Mian Muhammad)
Member (E)



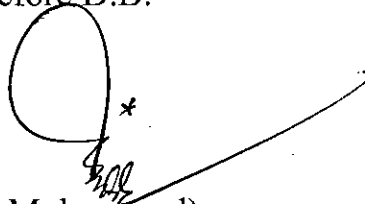
(Salah-Ud-Din)
Member (J)

10.01.2023

Appellant alongwith clerk of counsel present. Mr. Naseer-ud-
Din Shah, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for
adjournment on the ground that learned counsel for the appellant is
out of station today. Adjourned. To come up for arguments on
19.04.2023 before D.B.

SCANNED
KPST
Peshawar



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

1411.2021

Proper DB is not available, therefore, the case is adjourned to ~~1/3/22~~^{as} for the same before


Reader

1-3-22

Due to retirement of the Hon'ble Chairman the case is adjourned to come up for the same as before on 16-6-22


Reader

16.06.2022

Learned counsel for the appellant present. Mr. Fayyaz H.C alongwith Mr. Kabirullah Khattak, Additional Advocate General for official respondents No. 1 to 5 present. Private respondents No. 6 & 7 in person present.

Reply on behalf of official respondents No. 1 to 5 submitted, which is placed on file and copy of the same is handed over to learned counsel for the appellant. Private respondent No. 6 & 7 submitted in writing that they rely on the reply submitted by official respondent No. 1 to 5. Adjourned. To come up for rejoinder, if any, as well as arguments on 09.08.2022 before D.B.




(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

9-8-2022

Due to the public holiday the case is adjourned to 22-11-2022


Reader

09.07.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted for regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 26.11.2021 before the D.B.

Appellant Deposited
Security & Process Fee

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09/12/21



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Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 5738 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/06/2021 SCANNED KFST Peshawar	The appeal of Mr. Hayat Khan resubmitted today by Mr. Asadullah Khan Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please  REGISTRAR
2-	03/06/21	This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/07/2021</u>  CHAIRMAN

The appeal of Mr. Hayat Khan No. (883) Reader to DSP Headquarter Nowshera received today i.e. on 23.04.2021 is incomplete on the following score which is returned to counsel for the appellant for completion and resubmission within 15 days:-

1. Seniority list mentioned in para-6 of the memo of appeal is not attached with the appeal which may be placed on file.
2. Affidavit is not attached with the appeal, which may be placed on file.


No. 757 /ST,

Dt. 03/05 /2021



REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asad Ullah Khan Yousafzai, Advocate
Peshawar.

R/sir,

Re-submitted after due
completion. 

Returned again with the objection to complete
the spare copies along with all annexures within
10 days.


24/5/2021

BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

5738

Service Appeal No. _____/2021

Hayat Khan

V E R S U S

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others

INDEX

S.No.	Description of Documents	Annexure	Page No.
1	Memo of Service Appeal		1 - 5
2	Copy of impugned order	"A"	6
3	Copy of departmental appeal	"B"	7 - 8
4	Copy of impugned order	"C"	9
5	Wakalat Nama		✓

Appellant

Through



Asad Uallah Khan Yousafzai
Advocate High Court,
Peshawar

Office Address: 204-Al-Mumtaz Hotel near Molviji Hospital
Hashtnaghari Peshawar.

Cell # 0344-9021721

BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2021.

Hayat Khan No.(883)

Reader DSP/HQrs Nowshera.Appellant

V E R S U S

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Secretary Finance Government of Khyber Pakhtunkhwa at Civil Secretariat, Peshawar.
3. The Deputy Inspector General of Police, Mardan Region-I, Mardan.
4. District Police Officer (DPO), Nowshera.
5. Regional Police Officer (RPO) Mardan.
6. Talwar Ali Shah No.(696) Police Line Nowshera
7. Faiz Muhammad/FC No.(600), Police Line Nowshera
.....Respondents

Appeal U/S 4 of Khyber Pakhtunkhaw, Service Tribunal Act 1974 against the impugned Order No.1512-19/EC, dated Nowshera, the 11.02.2021 issued by Respondent No.4 whereby the respondent No. 6 and 7 were illegally promoted to C-II Head Constable by ignoring the petitioner, being senior to them, and order No. 1589/ES-dated Mardan Region the 24.03.2021 passed by Respondent No.5 whereby the departmental appeal against the impugned order was illegally, unlawfully "filed" by respondent No.5 by condemn unheard the petitioner.

Prayer:

That on acceptance of the subject Service Appeal the impugned Order No.1512-19/EC, dated Nowshera, the 11.02.2021 issued by Respondent No.4 and order No. 1589/ES-dated Mardan Region the 24.03.2021, passed by Respondent No.5 may very graciously be set aside, declare as null void and in effective upon the fundamental rights of the appellant and consequently the appellant be promoted as C-II Head Constable being senior and fit as compare to respondents No.6 and 7 alongwith all back benefits arises from the day on which the appellant became eligible for promotion. Any other relief which deems Just and proper may also be granted to the appellant keeping in view facts and circumstance of the case.

Respectfully Sheweth:

That brief facts and grounds giving rise to the instant Service Appeal are as under;

1. That the appellant joint the service of police department as constable BS-5, on 23.09.1987. He had about 33/34 years long unblemished service record.
2. That the appellant has performing his duty with grad zeal, zest and devotion. And in this long tenure of service no complaint was made of him to his high ups.
3. That the appellant continued his service with zeal, enthusiasm and honesty but the respondent No.1 to 5, ignored the appellant while promoted respondent No.6 and 7 being junior to the appellant vide impugned order dated 11.02.2021.
(Copy of impugned order is attached as Annexure "A")
4. That the appellant felt seriously aggrieved from the impugned promotion order dated 11.02.2021 filed departmental appeal on 24.02.2021 to the Respondent No.3 but the same was "filed" illegally, unlawfully and through a

non speaking order by the respondent No.5 by condemn unheard the appellant.

5. (Copies of departmental appeal and impugned order are attached as Annexure "B" & "C" respectively)

6. That having statutory right to redress his grievances and badly affected from the impugned orders as well as impugned Seniority List; the appellant approaches this honourable Tribunal amongst the following other grounds;

GROUND S:

- A) That the respondents have not treated appellant in accordance with law, rules and policy on the subject and acted in violation of article 4 constitution of Islamic republic of Pakistan 1973. Therefore impugned orders are not sustainable in the eyes of law.
- B) That the appellant was appointed in police force on 23.09.1987 as constable while on the other hand the respondent No.6 namely Talwar Ali Shah was appointed on 12.08.1991 while respondent No. 7 namely Faiz Muhammad was appointed on 01.07.1990, which clearly suggest that both the respondents were much junior to the appellant but even then the appellant was ignored while passing the impugned orders.
- C) That the appellant was appointed/in listed much prior to the respondent No. 6 and 7 and being eligible on the bases of seniority cum fitness and good performance, to be promoted as C-II Head Constable but the respondents No.1 to 5 illegally, unlawfully promoted respondents No.6 and 7 by pick and choose while ignoring the appellant.
- D) That similarly the departmental appeal of appellant was illegally/unlawfully "filed" by the respondent No.5 without giving an opportunity of personally hearing to the appellant.
- E) That the order of respondent No. 5 wherein the departmental appeal of the appellant was illegally "filed" is no order in the eyes of law because neither the same is speaking order nor opportunity of hearing was given to the appellant therefore the same may be struck down.
- F) That the impugned promotion order of respondent No.6 and 7 is squarely falls into out of turn promotion which has been declared as not only against the constitution but also against injunctions of Islam by the honourable Supreme

Court of Pakistan in a reported judgment as 2010 PLC (C.S) 924.

G) That respondent No.5 was legally bound to have decided the departmental appeal of the appellant after application of mind with cogent reasons being the requirement of law. But he fails to do so. And disposed of the said appeal by simply saying "filed" as apparent from the order dated 24.03.2021. Thus this type of decision would not full fill the requirement of law laid down by the august supreme court of Pakistan in case reported in 2011 SCMR P₁-1. The relevant citation is reproduce herein below.

(b) General Clauses Act (X of 1897)...

...S. 24-A....Speaking order-Public functionaries are bound to decide cases of their subordinates after application of mind with cogent reasons within reasonable time.

Therefore, the impugned order is bad in law.

H) That the placement of respondent No. 6 and 7 were wrongly/illegally made in the promotion list because both the respondents were much junior to the appellant therefore the impugned orders and promotion list are liable to be set aside on this score alone.

I) That not only the appellant was provided an opportunity of personal hearing rather he was not intimated regarding the dismissal/filing of his appeal therefore the appellant has been condemn unheard which is contrary to the basic principle of natural justice known as "**Audi Alteram Partem**" reliance in this respect can be placed on the judgment of august Supreme Court of Pakistan reported in PLD 2008 SC 412 (A)

(a) Administration of justice

Natural justice, principle of ...opportunity of hearingscope...order adverse to interest of a person cannot be passed without providing him an opportunity of hearing...departure from such rule may render such order illegal.

Thus the competent authority has acted in derogation of law by not giving any opportunity of personal hearing to the appellant before passing impugned order. Therefore the said order is liable to be set aside on this score alone.

- J) That act and omission of respondents is against the KPK Civil Servant (Appointment, Promotion and Transfer rules 1989 as well as against the relevant provision of KPK Civil Servant act 1973) and Police rules 1934.
- K) That the instant appeal is related to terms and conditions of Civil Servant and this honourable Tribunal has been vested with statutory power to entertain the matter.
- L) That any other grounds will be furnished at the time of final arguments with the prior permission of this honourable Tribunal.

Therefore, it is most humbly prayed that the instant Service Appeal be accepted as prayed for.

Appellant

Through



Asad Ullah Khan Yousafzai
Advocate High Court
Peshawar.

Amir MAS (6)

**OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA**

2021

Tel No. 0923-9220102 & Fax No. 0923-9220103
Email Dpo_nowsherakpk@yahoo.com


ORDER

Consequent upon the recommendation of the Departmental Promotion Committee in its meeting held on 03-02-2021 in the office of the undersigned duly approved by the Worthy Deputy Inspector General of Police, Mardan Region-I Mardan vide his office Memo No.737/ES, dated 09-02-2021; the following C-II Constables are hereby promoted to the rank of Offg: C-II Head Constable to BPS-09 (11770-730-33670) against the existing vacancies of C-II Head Constable with immediate effect:-

1. Talwar Ali Shah No.969
2. Raj Bahadar No.128/PTS Swabi
3. Muhammad Iftikhar No.780/NSR/392/FRP
- ✓ 4. Faiz Muhammad No.600

OS No. 168

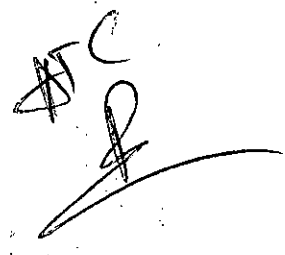
Dated 11/02/2021


District Police Officer,
Nowshera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 1512-19 /EC, dated Nowshera, the 11/02 /2021.

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

1. Deputy Inspector General of Police Mardan Region-I Mardan w/r to above.
 2. Commandant FRP, Khyber Pakhtunkhwa, Peshawar.
 3. SP Investigation Nowshera.
 4. Principal Police Training School, Swabi.
 5. District Accounts Officer, Nowshera.
 6. Pay Officer.
 7. OHC.
 8. FMC.
- 

Amir - B⁴ (7)

بخدمت جناب DIG صاحب مردان ریجن مردان

مضمون: درخواست بمراہ حصول انصاف اترقیابی بعہدہ ہیڈ کنسٹیبل

جناب عالی!

گزارش ہے کہ سائل مورخہ 23.09.1987 میں بحیثیت کنسٹیبل بھرتی ہو کر دوران ملازمت سائل نے ٹریک کورس، فنکر پرنٹ کورس، گیس

کورس کے علاوہ سال 1991 میں A-1 امتحان پاس کر کے سال 1994-95-96 میں B-1 امتحانات پاس کر کے مگر بد قسمتی سے لوئر کورس کیلئے منتخب نہ ہو سکا۔

جناب عالی سائل کو C-1 لسٹ میں ناکامی کے بعد بمطابق پولیس رولز باب 13 فقرہ نمبر 8 محکمہ طور پر یکسر نظر انداز کر کے سال 1996 سے C-II پر ترقی نہیں دیکر جو کہ

بیرے جائز حق کو بریغمال بنا کر 23 سال بعد مورخہ 31.03.2010 کو لسٹ C-II پر لایا گیا ہے۔ چونکہ اب ملازمت کا عرصہ 33 سال 04 ماہ نہایت خوش اسلوبی سے

گزار کر مجھے اپنا حکمانہ حق نہ مل سکا اسلئے کہ مجھ سے جو میر کنسٹیبلان جو کہ A-1 اور B-1 امتحانات بھی پاس نہ کر کے اور ساتھ ہی Over age بھی نہ تھے انکو سینئر بنا کر

لسٹ C-II پر ترقی دی گئی ہے جو کہ اب مجھ سے سینئر بن کر جنہوں نے افسران بالا صاحبان کے احکامات کے باوجود بھی P-G 04/2013 کا پرواہ نہ کر کے سفارشی آڈر پر

Over age نہ ہوتے ہی C-1 کے جتو کے بجائے لسٹ C-II کے کھوٹے میں پناہ لیکر سینئر بن گئے ہیں۔ اور لسٹ C-II پر پروموشن بھی لیا گیا ہے محکمہ طور پر سینئر Over

age ملازمان کو مسلسل نظر انداز کیا جا رہا ہے جو کہ سراسر نا انصافی ہے اگر میں 60 سال تک نوکری بھی کروں تو پروموشن کے آثار ممکن نہیں ہے۔

استدعاء ہے کہ افسران بالا صاحبان محکمہ چھان بین کے علاوہ سپریم کورٹ کے فیصلہ کی روشنی میں Out of term پروموشن لینے والے افراد کو

لسٹ C-II سے ہٹایا جائے جنہوں نے غیر قانونی دوسروں کے حقوق بریغمال بنا رکھے ہیں اور سائل کی سینیاریٹی کو مد نظر رکھ کر لسٹ C-II پر بعہدہ ہیڈ کنسٹیبل ترقیاب کرنے کا

حکم صادر فرمائی جاوے۔

عین نوازش ہوگی

24-02-2021

العارض

آپکا تابع فرمان حیات خان C-II/883 متعین ریڈر جناب DSP/HQrs صاحب نوشہرہ

ATC

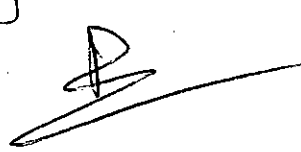
Applicant Hayat Khan No. 883

As for as case of the applicant Hayat Khan No. 883 is concerned, in this regard, it is, submitted that he is at serial No. 83 in the seniority list of C-II constables and he will also be considered for promotion on his own turn. As per standing order No. 06/2014, seniority of constables placed on list C-II is determined from the date of entry into the promotion list C-II.

Keeping in view the above facts, it is therefore, requested that applications of the applicants may kindly be filed please.

Submitted please.


District Police Officer,
Nowshera.

~~ATC~~


Government of Khyber Pakhtunkhwa
Office of the Regional Police Officer,
Mardan

Phone No. 0937-9230113, Fax No. 0937-9230115.
Email Address: - esrpomardan@gmail.com

To : The District Police Officer,
Nowshera.

No. **1589** /ES, dated Mardan Region, the **24 - 103/2021**.

Subject: **APPLICATIONS.**

Memo:

Reference your office Memo: No. 2386/EC dated 10.03.2021 on the
subject noted above.

Applications for promotion as C-II Head Constable in respect of the
following C-II Constables was examined and filed by this office.

1. Badshah Khan No. 717
2. Hayat Khan No. 883

Regional Police Officer,
Mardan.

A/C
D

Police DepartmentDistrict NowsheraLIST OF C-II CONSTABLES

S.No	Name & No	D/O Enlistment	Date of promotion List C-II with OB No	Remarks
1.	FC Liaqat Ali No. 797	19.03.1990	189/14.02.1996	Promoted as HC
2.	FC Shah Hussain No.571	01.07.1990	189/14.02.1996	Promoted as HC
3.	FC Nasrullah Jan No.585	01.07.1990	189/14.02.1996	Promoted as HC
4.	FC Abdul Rehman No.50	10.07.1991	210/18.02.1996	Promoted as HC
5.	FC Tajbar Khan No.887	11.07.1991	210/18.02.1996	Promoted as HC
6.	FC Ihsan Ali No. 535	01.07.1990	810/13.08.1996	Promoted as HC
7.	FC Naseer Ud Din No. 330	01.07.1985	831/15.05.1996	On deputation Special Branch (LPR)
8.	FC Akhtar Gul No.803	31.03.1990	837/15.08.1996	Promoted as HC
9.	FC Meher Rehman No.266	24.12.1986	896/18.08.1997	Promoted as HC
10.	FC Nabi Ullah No.843	10.07.1991	285/04.03.1998	Promoted as HC
11.	FC Qajeer Zada No. 705	27.06.1989	287/04.03.1998	Promoted as HC
12.	FC Jamdad Khan No.583	01.07.1990	287/04.03.1998	Promoted as HC
13.	FC Farhad Ali No.334	01.01.1985	1370/16.10.1998	Promoted as HC
14.	FC Sikandar Shah No.213	22.12.1985	1370/16.10.1998	
15.	FC Mohammad Zeb No.412	13.01.1987	1370/16.10.1998	
16.	FC Jahanzeb Khan No.971	16.08.1988	1370/16.10.1998	
17.	FC Khan Zali No.49	15.09.1990	1370/16.10.1998	
18.	FC Mohammad Diyar No.377	27.06.1994	1370/16.10.1998	
19.	FC Saleh Mohammad No.763	29.12.1994	1387/17.10.1998	
20.	FC Amir Zaman No.505	01.07.1990	1388/17.10.1998	
21.	FC Azmat Khan No.542	22.03.1986	1397/17.10.1998	
22.	FC Mohammad Nazeef Khan No.91	02.08.1988	1428/22.10.1998	On deputation Special Branch
23.	FC Aman Ullah No.558	01.07.1990	110/03.02.1999	
24.	FC Jamal Shah No.467	01.07.1990	558/18.05.1999	
25.	FC Saeed Ullah No.801	19.03.1990	610/25.05.1999	
26.	FC Said Karim No.808	07.02.1983	653/06.06.1999	
27.	FC Mohammad Imtiaz No.11	16.03.1991	743/25.06.1999	
28.	FC Misal Khan No.657	20.12.1988	73/24.01.2000	
29.	FC Murad Ali No.827	10.07.1991	122/28.01.2000	
(30)	FC Galwar Ali Shah No.969	12.08.1991	122/28.01.2000	
(31)	FC Raj Bahader No.128	22.03.1986	125/28.01.2000	
32.	FC Mohammad Ajmal No.286	19.12.1990	158/01.02.2000	

ڈی ایچ او سرگودھا ڈسٹرکٹ پولیس ڈپارٹمنٹ
 ڈی ایچ او سرگودھا ڈسٹرکٹ پولیس ڈپارٹمنٹ

ATC

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33.	FC Zahoor Ahmad No.371	20.09.1990	160/01.02.2000	
34.	FC Azeem Ur Rehman No.37	24.03.1986	189/19.03.2002	On deputation ACE
35.	FC Iftikhar Khan No.780	12.12.1988	189/19.03.2002	
36.	FC Faiz Mohammad No.600	01.07.1990	189/19.03.2002	
37.	FC Mohammad Tariq No.665	26.12.1990	189/19.03.2002	
38.	FC Fajid Ur Rehman No.87	01.12.1991	189/19.03.2002	On deputation CTD
39.	FC Iltaf Hussain No.198	18.07.1995	189/19.03.2002	
40.	FC Iqtidar Ahmad No.603	01.09.1990	191/20.03.2002	
41.	FC Fazle Amin No.152	05.11.1975	656/08.07.2002	
42.	FC Mohammad Iqbal No.1050	05.11.1975	771/06.08.2002	
43.	FC Jahanzeb No.425	11.06.1983	952/17.09.2002	
44.	FC Noor Ul Wahab No.970	01.12.1991	966/19.09.2002	On deputation ACE
45.	FC Zar Badshah No.673	20.06.1988	1110/05.11.2002	
46.	FC Zalam Khan No.770	08.12.1988	1273/23.12.2002	
47.	FC Mohammad Ayaz No.422	24.01.1980	99/28.01.2003	
48.	FC Amjid Ali No.507	01.07.1990	139/04.02.2003	On deputation Traffic Peshawar
49.	FC Aurangzeb No.832	16.10.1991	156/10.02.2003	
50.	FC Naeem Ullah No.99	13.03.1991	214/01.03.2003	
51.	FC Zar Ali No.794	17.03.1990	215/01.03.2003	
52.	FC Masroof Ali Shah No.894	10.07.1991	290/18.03.2003	
53.	FC Mohammad Faraz No.659	27.06.1989	373/10.04.2003	
54.	FC Imrad Ali No.549	01.07.1990	409/15.04.2003	
55.	FC Ibrahim No.516	01.07.1990	415/15.04.2003	
56.	FC Jan Wali No.575	01.07.1990	450/22.04.2003	
57.	FC Mujahid Shah No.508	01.07.1990	450/22.04.2003	
58.	FC Farzand Ali No.748	17.07.1988	554/08.05.2003	
59.	FC Johar Ali No.400	15.04.1985	563/14.05.2003	
60.	FC Abdul Wali No.519	01.07.1990	581/17.05.2003	
61.	FC Khilawat Shah No.807	01.07.1990	582/17.05.2003	On deputation special branch
62.	FC Sajjad Akhtar No.903	11.04.1991	616/25.05.2003	
63.	FC Abdul Rauf No.314	17.01.1981	639/30.05.2003	
64.	FC Riaz Ahmad No.267	19.03.1987	666/05.06.2003	
65.	FC Mohammad Shah No.867	08.12.1988	667/05.06.2003	
66.	FC Aurangzeb No.980	12.08.1991	667/05.06.2003	
67.	FC Zahid Gul No.485	31.07.1990	711/12.06.2003	
68.	FC Shaukat Ali No.949	03.07.1991	788/28.06.2003	

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69.	FC Mohammad Ayaz No.228	08.09.1982	803/01.07.2003	
70.	FC Jahangir Khan No.111	28.03.1993	869/12.07.2003	س
71.	FC Ajmal Khan No.666	01.07.1989	895/18.07.2003	س
72.	FC Shamshad Ali No.327	13.08.1991	895/18.07.2003	س
73.	FC Fazle Akbar No.738	08.12.1988	896/18.07.2003	دستخورد
74.	FC Ayaz Ali No.994	01.10.1992	896/18.07.2003	س
75.	FC Rasheed Ul Haq No.36	30.07.1991	899/18.07.2003	س
76.	FC Noor Shed No. 302	28.09.1983	921/19.07.2003	دستخورد
77.	FC Mushtaq No.649	07.08.1984	921/19.07.2003	"
78.	FC Riaz Ali No.374	03.07.1985	921/19.07.2003	"
79.	FC Mohammad Shafiq No.511	25.06.1986	921/19.07.2003	"
80.	FC Jamal Shah No.410	28.06.1986	921/19.07.2003	"
81.	FC Fazil Khan No.545	30.10.1988	921/19.07.2003	"
82.	FC Sher Bahadur No.445	25.09.1990	988/18.03.2003	س
83.	FC Shoukat Hayat No.680	08.12.1988	648/29.07.2004	دستخورد
84.	FC Mukhtyar Nabi No.397	01.07.1990	688/12.08.2004	On deputation Traffic Peshawar س
85.	FC Sharif Gul No.856	10.07.1991	824/12.10.2004	س
86.	FC Saeed Ullah No.635	02.12.1996	835/14.10.2004	س
87.	FC Ishfaq No.947	24.08.2000	835/14.10.2004	س
88.	FC Sardar Ali No.943	24.09.1996	757/11.09.1999	Bottom FRP Peshawar س
89.	FC Arshid Ali No.570	01.07.1990	1030/15.12.2004	"
90.	FC Liaqat Ali No.749	08.12.1988	1031/15.12.2004	س
91.	FC Javid No.786	29.04.1992	975/19.12.2004	س
92.	FC Mohammad Tahir No.307	22.08.1982	15/05.01.2005	دستخورد
93.	FC Zameer Gul No.853	10.07.1991	15/05.01.2005	س
94.	FC Fazal Ghani No.767	08.12.1988	19/07.01.2005	On deputation NHA/Motorway س
95.	FC Feroz No.252	01.09.1992	30/08.01.2005	On deputation Tele "
96.	FC Barkat Ali No.1057	26.06.1993	57/14.01.2005	"
97.	FC Saif Ali No.757	18.10.1995	125/17.02.2005	"
98.	FC Shahid Akhtar No.1162	12.08.1991	1153/24.08.2002	Bottom charssada "
99.	FC Tariq Ahmad No.459	01.07.1990	428/14.06.2005	"
100.	FC Khurshid No.638	20.09.1988	918/02.06.1997	Bottom Mardan "
101.	FC Ziladar No.29	29.12.1994	546/11.07.2005	On deputation Special Branch "
102.	FC Farid Khan No.1000	12.08.1991	624/15.08.2005	س "
103.	FC Azeem Dad No.687	29.06.1989	695/12.09.2005	س
104.	FC Jan Ali No.813	20.09.1989	335/21.04.2006	"
105.	FC Aurangzeb No.764	08.12.1988	485/05.06.2006	دستخورد
106.	FC Naseer Mohammad No.850	10.07.1991	523/15.06.2006	س

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107.	FC Abdul Awal No.27	26.06.1996	524/15.06.2006	
108.	FC Naveed Ullah No.1046	01.12.1996	532/17.06.2006	
109.	FC Dil Mohammad No. 935	17.07.1993	534/17.06.2006	
110.	FC Zakir Khan No.793	06.07.1998	780/07.09.2006	
111.	FC Sadiq Ahmad No.557	01.07.1990	894/07.10.2006	
112.	FC Riaz Khan No.824	10.07.1991	1095/23.12.2006	
113.	FC Bacha Khan No.717	08.12.1988	104/01.02.2007	
114.	FC Meher Rehman No.1135	26.06.1996	139/08.02.2007	Bottom seniority
115.	FC Amjid Ghafar No.39	01.07.1985	188/24.02.2007	
116.	FC Amin Khan No.251	20.11.1991	1212/05.10.2007	
117.	FC Waheed Ullah No.431	01.12.1986	1226/05.10.2007	
118.	FC Waris Khan No.336	27.09.1988	1235/06.10.2007	
119.	FC Parveez Gul No.956	01.09.1992	1235/06.10.2007	
120.	FC Riaz Gul No.735	30.03.1994	1239/06.10.2007	
121.	FC Aziz Ur Rehman No.1051	07.07.1994	1239/06.10.2007	
122.	FC Sher Alam No. 1054	08.01.1995	1239/06.10.2007	
123.	FC Mohammad Tahir No.527	01.07.1990	1243/06.10.2007	
124.	FC Shahid Hussain No.986	01.09.1992	1245/06.10.2007	
125.	FC Maqbali Khan No. 671	26.12.1990	1253/06.10.2007	
126.	FC Najme Alam No.975	18.08.1991	1255/06.10.2007	
127.	FC Munsif Khan No.983	10.07.1991	1261/06.10.2007	
128.	FC Mohammad Tahir No.1043	07.07.1994	1265/06.10.2007	
129.	FC Mohammad Sajid No.916	02.08.1991	1266/06.10.2007	
130.	FC Fazal Habib No.789	07.12.1991	1270/06.10.2007	
131.	FC Lal Mohammad No.847	10.07.1991	1276/06.10.2007	
132.	FC Imtiaz No.721	24.08.1989	1277/06.10.2007	On deputation Anti Corruption
133.	FC Inwan No.1056	28.09.1995	1279/06.10.2007	
134.	FC Saleem Javid No.541	17.07.1991	1280/06.10.2007	
135.	FC Zahir Rasool No.625	01.12.1991	1281/06.10.2007	
136.	FC Abdul Baqi No.1118	15.10.1991	1284/06.10.2007	
137.	FC Iftikhar Hussain No.800	01.07.1990	1286/06.10.2007	
138.	FC Nawab Ali No.834	09.07.1991	1286/06.10.2007	
139.	FC Idrees Khan No.658	03.07.1996	376/12.04.2008	
140.	FC Amjid Ali No.567	01.07.1990	470/10.05.2008	
141.	FC Tashqand No.568	01.09.1990	524/13.05.2008	
142.	FC Farhad Ali No.1005	05.07.1993	524/13.05.2008	
143.	FC Shah Hassan No.296	09.07.1998	524/13.05.2008	
144.	FC Mohammad Ayub No.339	18.12.1994	803/26.06.2008	
145.	FC Ghulam Murtaza No.340	01.07.1990	926/19.07.2008	

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3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100.

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|------|------------------------------|------------|-----------------|-----------------------------------|
| 146. | FC Said Ali Shah No.502 | 01.04.1999 | 954/23.07.2008 | |
| 147. | FC Ijaz Ul Haq No.604 | 01.07.1990 | 957/24.07.2008 | |
| 148. | FC Parveez Akhtar No.667 | 12.11.1990 | 1130/22.08.2008 | |
| 149. | FC Farhad Ali No.1160 | 09.10.1994 | 1495/29.10.2008 | |
| 150. | FC Imtiaz Ali No.165 | 04.06.1991 | 1753/18.12.2008 | |
| 151. | FC Nawsher Zaman No.316 | 24.06.1986 | 1758/18.12.2008 | |
| 152. | FC Hawaldar No.472 | 28.08.1995 | 1758/18.12.2008 | |
| 153. | FC Yar Mohammad No.605 | 01.07.1990 | 1760/18.12.2008 | |
| 154. | FC Abdul Rasheed No.612 | 22.03.1986 | 1761/18.12.2008 | |
| 155. | FC Liaqat Ali No.958 | 10.10.1990 | 1762/18.12.2008 | |
| 156. | FC Fazal Mohammad
No.1277 | 05.07.1993 | 143/21.01.2009 | |
| 157. | FC Mohammad Wisal
No.1042 | 06.07.1994 | 679/11.04.2009 | |
| 158. | FC Nasir Khan No.1016 | 26.05.1999 | 679/11.04.2009 | |
| 159. | FC Shujat No.806 | 06.07.1998 | 950/30.05.2009 | |
| 160. | FC Arshid Ali No.1112 | 31.01.2002 | 957/02.06.2009 | |
| 161. | FC Irshad Ali No.919 | 01.01.1990 | 1285/24.06.2009 | |
| 162. | FC Sher Zada No.1007 | 27.10.1992 | 1293/24.06.2009 | |
| 163. | FC Ghaffar Ali No.433 | 15.01.1995 | 1300/24.06.2009 | |
| 164. | FC Wazir Jamal No.517 | 01.07.1990 | 1301/24.06.2009 | |
| 165. | FC Shamshad Ali No.838 | 10.07.1991 | 1311/24.06.2009 | |
| 166. | FC Amjid Ali No.586 | 01.07.1990 | 1312/25.06.2009 | |
| 167. | FC Mohammad Javid
No.169 | 08.07.1998 | 1313/25.06.2009 | |
| 168. | FC Riaz Mohammad NO.624 | 15.09.1990 | 1314/25.06.2009 | |
| 169. | FC Sher Ali No.614 | 09.12.1990 | 1315/25.06.2009 | |
| 170. | FC Islam Shah No.461 | 08.07.1998 | 1315/25.06.2009 | |
| 171. | FC Farhad Ali No.219 | 13.12.1990 | 1318/25.06.2009 | |
| 172. | FC Liaqat Ali No.817 | 02.07.1982 | 1319/25.06.2009 | |
| 173. | FC Zahir Khan No.678 | 20.10.1990 | 1319/25.06.2009 | |
| 174. | FC Mushtaq Ahmad No.917 | 12.08.1991 | 1319/25.06.2009 | |
| 175. | FC Qaisar Zaman No.581 | 20.08.1991 | 1319/25.06.2009 | |
| 176. | FC Abdul Rasheed No.972 | 15.03.1995 | 1319/25.06.2009 | On deputation Traffic
Peshawar |
| 177. | FC Dost Mohammad No.771 | 08.07.1998 | 1319/25.06.2009 | |
| 178. | FC Jami Ud Din No.513 | 01.07.1990 | 1323/25.06.2009 | |
| 179. | FC Kifayat Shah No.355 | 18.11.1990 | 1323/25.06.2009 | |
| 180. | FC Zafrullah No.443 | 11.12.1990 | 1323/25.06.2009 | |
| 181. | FC Taimous No.859 | 10.07.1991 | 1323/25.06.2009 | |
| 182. | FC Javid No.724 | 15.02.1996 | 1323/25.06.2009 | |
| 183. | FC Imran Khan No.159 | 09.07.1998 | 1323/25.06.2009 | |
| 184. | FC Shah Room No.246 | 11.11.1999 | 1323/25.06.2009 | |

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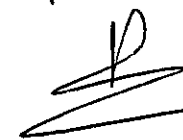
| | | | | |
|------|----------------------------|------------|-----------------|----------------------------|
| 185. | FC Hayat Khan No.883 | 23.09.1987 | 359/31.03.2010 | |
| 186. | FC Irshad Ali No.552 | 01.07.1990 | 359/31.03.2010 | |
| 187. | FC Jawaz Khan No.696 | 20.03.1988 | 491/13.05.2010 | |
| 188. | FC Jahanzeb No.194 | 28.09.1995 | 1048/24.09.2010 | |
| 189. | FC Fazle Rehman No.1193 | 26.07.2007 | 44/06.01.2011 | |
| 190. | FC Mustahab Gul No. 1060 | 31.01.2002 | 56/06.01.2011 | |
| 191. | FC Ishfaq No.1257 | 26.07.2007 | 76/10.01.2011 | |
| 192. | FC Bahar Ali No.417 | 16.11.1983 | 342/11.03.2011 | |
| 193. | FC Mukhtaj Ud Din No.460 | 01.07.1990 | 393/16.03.2011 | |
| 194. | FC Dawood Ur Rehman No.254 | 09.07.1998 | 447/29.03.2011 | |
| 195. | FC Adnan Khan No.610 | 07.08.1999 | 669/16.05.2011 | |
| 196. | FC Shakeel No.700 | 29.05.2007 | 1040/21.07.2011 | |
| 197. | FC Abdul Wajid No.589 | 22.07.1998 | 1121/09.08.2011 | |
| 198. | FC Niaz Ali No.137 | 13.07.1994 | 1298/13.09.2011 | |
| 199. | FC Sikandar Khan No.835 | 10.07.1991 | 1369/23.09.2011 | |
| 200. | FC Bahar Ali No.630 | 04.05.2006 | 1431/03.09.2011 | |
| 201. | FC Mashooq Ali No.982 | 16.02.2002 | 1438/01.10.2011 | On deputation CTD |
| 202. | FC Shah Saud No.904 | 03.07.1991 | 1449/13.10.2011 | |
| 203. | FC Waheed Khan No.1142 | 22.07.1998 | 1554/26.10.2011 | |
| 204. | FC Rafi Ud Din No.124 | 08.12.1988 | 1555/26.10.2011 | |
| 205. | FC Jan Raz No.1069 | 31.01.2002 | 1555/26.10.2011 | |
| 206. | FC Anwar Mehmood NO.1304 | 01.08.2008 | 1555/26.10.2011 | |
| 207. | FC Amjid Khan No.294 | 01.04.1992 | 1717/26.11.2011 | |
| 208. | FC Mohammad Saleem No.492 | 01.07.1990 | 1857/19.12.2011 | |
| 209. | FC Manzoor Ullah No.985 | 09.07.1998 | 1857/19.12.2011 | |
| 210. | FC Arshid No.175 | 17.09.1999 | 1857/19.12.2011 | |
| 211. | FC Mohammad Shafiq No.168 | 11.12.1990 | 1900/27.12.2011 | |
| 212. | FC Waheed No.621 | 31.01.2002 | 27/05.01.2012 | |
| 213. | FC Misbah Ullah No.990 | 01.09.1992 | 210/16.02.2012 | |
| 214. | FC Sher Hassan No.1036 | 08.01.1995 | 210/16.02.2012 | |
| 215. | FC Sher Ajab No.937 | 24.04.1995 | 210/16.02.2012 | |
| 216. | FC Jan Mohammad No.1250 | 23.04.2004 | 210/16.02.2012 | |
| 217. | FC Nasrat Ali No.441 | 20.12.1999 | 238/20.02.2012 | |
| 218. | FC Imroz Khan No.654 | 01.10.1989 | 269/02.03.2012 | |
| 219. | FC Nawsherawan No.330 | 09.07.1998 | 312/07.03.2012 | |
| 220. | FC Amjid Ali No.127 | 19.07.1999 | 312/07.03.2012 | On deputation CPO Peshawar |
| 221. | FC Abid No.1183 | 26.07.2007 | 312/07.03.2012 | |
| 222. | FC Hazrat Munir No.453 | 10.10.1989 | 315/07.03.2012 | |

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|------|-----------------------------|------------|-----------------|------------------------------|
| 223. | FC Bakht Jehan No.641 | 01.02.1996 | 326/09.03.2012 | |
| 224. | FC Bakht Ali No.1035 | 19.04.1995 | 390/19.03.2012 | |
| 225. | FC Tasleem Khan No.373 | 10.07.1991 | 469/02.04.2012 | |
| 226. | FC Niaz Ali No.31 | 02.04.1995 | 620/29.04.2012 | |
| 227. | FC Alamzeb No.77 | 06.07.1998 | 620/29.04.2012 | |
| 228. | FC Niqab Gul No.328 | 08.07.1998 | 661/11.05.2012 | On deputation special branch |
| 229. | FC Maqbool Shah No.944 | 12.08.1991 | 796/05.06.2012 | |
| 230. | FC Naik Mohammad No.762 | 08.12.1988 | 811/07.06.2012 | |
| 231. | FC Akbar Ali No.533 | 01.07.1990 | 842/15.06.2012 | |
| 232. | FC Mukhtyar Hussain No.796 | 19.03.1990 | 877/27.06.2012 | |
| 233. | FC Ahsan Khan No.622 | 31.01.2002 | 979/23.07.2012 | |
| 234. | FC Mohammad Zahir No.297 | 23.06.1996 | 1102/30.08.2012 | |
| 235. | FC Ahmad Anwar No.1163 | 07.11.1996 | 1104/30.08.2012 | |
| 236. | FC Amir Badshah No.1010 | 26.08.1991 | 1151/12.09.2012 | |
| 237. | FC Khushdil No.833 | 10.07.1991 | 1229/03.10.2012 | |
| 238. | FC Changez Khan No.188 | 16.02.2002 | 1245/03.10.2012 | |
| 239. | FC Ishfaq No.218 | 05.07.1994 | 1247/05.10.2012 | |
| 240. | FC Ambar Shah No.747 | 19.09.1994 | 1247/05.10.2012 | |
| 241. | FC Ghaffar Ali No.449 | 08.12.1988 | 1306/22.10.2012 | |
| 242. | FC Ferman Shah No.401 | 21.10.1992 | 1306/22.10.2012 | |
| 243. | FC Zahoor No.776 | 09.07.1998 | 1359/17.11.2012 | |
| 244. | FC Gul Shah No.119 | 31.01.2002 | 1369/12.11.2012 | |
| 245. | FC Iftikhar No.523 | 01.07.1990 | 1391/27.11.2012 | |
| 246. | FC Aurangzeb No.840 | 10.07.1991 | 1391/27.11.2012 | |
| 247. | FC Abdullah No.1229 | 26.07.2007 | 1422/03.12.2012 | |
| 248. | FC Wajid Ali No.780 | 04.05.2006 | 199/06.02.2013 | |
| 249. | FC Baz Mohammad No. 1270 | 16.11.2011 | 341/12.03.2013 | |
| 250. | FC Qasid Ali No.1311 | 26.05.2008 | 346/12.03.2013 | |
| 251. | FC Haider Zaman No.13 | 31.01.2002 | 347/12.03.2013 | |
| 252. | FC Gul Naras No. 777 | 16.10.1991 | 381/20.03.2013 | |
| 253. | FC Sohail No.1152 | 10.08.1999 | 381/20.03.2013 | |
| 254. | FC Bahri Karam No.548 | 13.07.1998 | 392/21.03.2013 | |
| 255. | FC Zahid Ullah No.877 | 10.07.1991 | 431/02.04.2013 | |
| 256. | FC Riaz Akbar No.12/692EF | 09.07.1998 | 431/02.04.2013 | |
| 257. | FC Mohammad Ayub No.51 | 29.05.2007 | 444/04.04.2013 | |
| 258. | FC Sahib Gul No.427 | 12.03.1995 | 467/05.04.2013 | |
| 259. | FC Raj Wali No.21 | 09.07.1998 | 467/05.04.2013 | |
| 260. | FC Kazim Ali Shah No. 1074 | 27.02.2002 | 467/05.04.2013 | |
| 261. | FC Himayat Ali Shah No.1124 | 24.11.2003 | 467/05.04.2013 | |

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|------|-------------------------------|------------|-----------------|--|
| 262. | FC Zahid No.664 | 18.02.2002 | 1067/19.08.2013 | |
| 263. | FC Afsar Khan No.457 | 08.07.1998 | 1871/03.12.2013 | |
| 264. | FC Zia Ullah No.179 | 15.09.1996 | 1881/03.12.2013 | |
| 265. | FC Fida Mohammad
No.1088 | 31.01.2002 | 1881/03.12.2013 | |
| 266. | FC Fayaz No.708 | 28.06.1989 | 1888/03.12.2013 | |
| 267. | FC Hukam Zada No.946 | 12.08.1991 | 1888/03.12.2013 | |
| 268. | FC Abbas Khan No.1261 | 26.07.2006 | 1888/03.12.2013 | |
| 269. | FC Mohammad Sadiq
No.620 | 04.05.2006 | 1897/04.12.2013 | |
| 270. | FC Aman Ullah No.222 | 26.07.1984 | 2001/04.12.2013 | |
| 271. | FC Zul Hakeem No.1041 | 05.07.1994 | 2001/04.12.2013 | |
| 272. | FC Ibrahim Ullah No.628 | 01.10.2001 | 2001/04.12.2013 | |
| 273. | FC Amin Ali No.345 | 25.10.2004 | 2091/12.12.2013 | |
| 274. | FC Mohammad Tahir
No.1086 | 31.01.2002 | 2097/13.12.2013 | |
| 275. | FC Sarzamin No.342 | 31.01.2002 | 2097/13.12.2013 | |
| 276. | FC Shafi Ullah No.1027 | 15.06.1993 | 2101/13.12.2013 | |
| 277. | FC Habeeb Ur Rehman
No.692 | 25.10.2004 | 2101/13.12.2013 | |
| 278. | FC Naseer Alam No.190 | 01.08.2008 | 2101/13.12.2013 | |
| 279. | FC Noor Subhan No.865 | 20.08.1999 | 2106/13.12.2013 | |

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LIST OF C-II CONSTABLES

| S.No | Name & No | D/O Enlistment | D/O Blrth | Date of promotion
List C-II with OB No |
|------|---------------------------|----------------|------------|---|
| 1. | FC Fajid Ur Rehman No.87 | 01.12.1991 | 28-03-1966 | 189/19.03.2002 |
| 2. | FC Iqtidar Ahmad No.603 | 01.09.1990 | 20-09-1965 | 191/20.03.2002 |
| 3. | FC Fazle Amin No.152 | 14.12.1996 | 11.03.1975 | 656/08.07.2002 |
| 4. | FC Noor Ul Wahab No.970 | 01.12.1991 | 05-05-1972 | 966/19.09.2002 |
| 5. | FC Zar Badshah No.673 | 20.06.1988 | 01.05.1969 | 1110/05.11.2002 |
| 6. | FC Zelam Khan No.770 | 08.12.1988 | 27-02-1967 | 1273/23.12.2002 |
| 7. | FC Mughalbaz No.424 | 15.07.1985 | 15.07.1967 | 1303/28.12.2002 |
| 8. | FC Mohammad Ayaz No.422 | 24.01.1980 | 10-01-1962 | 99/28.01.2003 |
| 9. | FC Aurangzeb No.832 | 16.10.1991 | 12-07-1971 | 156/10.02.2003 |
| 10. | FC Naeem Ullah No.99 | 13.03.1991 | 30-12-1970 | 214/01.03.2003 |
| 11. | FC Zar Ali No.794 | 17.03.1990 | 27-04-1968 | 215/01.03.2003 |
| 12. | FC Imrad Ali No.549 | 01.07.1990 | 02-02-1970 | 409/15.04.2003 |
| 13. | FC Ibrahim No.516 | 01.07.1990 | 07-04-1969 | 415/15.04.2003 |
| 14. | FC Jan Wali No.575 | 01.07.1990 | 14-03-1968 | 450/22.04.2003 |
| 15. | FC Farzand Ali No.748 | 17.07.1988 | 15-04-1966 | 554/08.05.2003 |
| 16. | FC Abdul Wali No.519 | 01.07.1990 | 20-09-1966 | 581/17.05.2003 |
| 17. | FC Sajjad Akhtar No.903 | 11.04.1991 | 11.04.1969 | 616/25.05.2003 |
| 18. | FC Abdul Rauf No.314 | 17.01.1981 | 03-05-1963 | 639/30.05.2003 |
| 19. | FC Riaz Ahmad No.267 | 19.03.1987 | 19-06-1968 | 666/05.05.2003 |
| 20. | FC Aurangzeb No.980 | 12.08.1991 | 01-02-1968 | 667/05.06.2003 |
| 21. | FC Zahid Gul No.485 | 31.07.1990 | 03-09-1971 | 711/12.06.2003 |
| 22. | FC Jahangir Khan No.111 | 28.03.1993 | 08-02-1969 | 869/12.07.2003 |
| 23. | FC Shamshad Ali No.927 | 12.08.1991 | 10-10-1971 | 895/18.07.2003 |
| 24. | FC Ayaz Ali No.994 | 01.10.1992 | 08.01.1972 | 896/18.07.2003 |
| 25. | FC Riaz Ali No.374 | 03.07.1985 | 13-12-1966 | 921/19.07.2003 |
| 26. | FC Jamal Shah No.410 | 28.06.1986 | 12-03-1966 | 921/19.07.2003 |
| 27. | FC Sher Bahader No.445 | 25.09.1990 | 15-11-1969 | 988/18.03.2003 |
| 28. | FC Shoukat Hayat No.680 | 08.12.1988 | 05-01-1969 | 648/29.07.2004 |
| 29. | FC Ishfaq No.947 | 24.08.2000 | 12-04-1978 | 835/14.10.2004 |
| 30. | FC Mohammad Tahir No.307 | 22.08.1982 | 02-01-1964 | 15/05.01.2005 |
| 31. | FC Feroz No.810 | 01.09.1992 | 07-07-1967 | 30/08.01.2005 |
| 32. | FC Barkat Ali No.1057 | 26.06.1993 | 16-06-1973 | 57/14.01.2005 |
| 33. | FC Saif Ali No.757 | 18.10.1995 | 01-07-1977 | 125/17.02.2005 |
| 34. | FC Tariq Ahmad No.459 | 01.07.1990 | 04.12.1970 | 428/14.06.2005 |
| 35. | FC Ziladar No.29 | 29.12.1994 | 03.05.1974 | 546/11.07.2005 |
| 36. | FC Naseer Mohammad No.850 | 10.07.1991 | 15-03-1973 | 523/15.06.2006 |
| 37. | FC Abdul Awal No.27 | 26.06.1996 | 10-04-1976 | 524/15.06.2006 |
| 38. | FC Naveed Ullah No.1046 | 01.12.1996 | 17-07-1978 | 532/17.06.2006 |
| 39. | FC Bacha Khan No.717 | 08.12.1988 | 30-03-1970 | 104/01.02.2007 |
| 40. | FC Meher Rehman No.1135 | 26.06.1996 | 03.04.1975 | 139/08.02.2007 |
| 41. | FC Amjid Ghafar No.39 | 01.07.1985 | 10-05-1967 | 188/24.02.2007 |
| 42. | FC Amin Khan No.251 | 20.11.1991 | 03-11-1973 | 1212/05.10.2007 |
| 43. | FC Waheed Ullah No.431 | 01.12.1986 | 01-12-1968 | 1226/05.10.2007 |
| 44. | FC Parveez Gul No.956 | 01.09.1992 | 05.05.1971 | 1235/06.10.2007 |
| 45. | FC Riaz Gul No.735 | 30.03.1994 | 23-05-1973 | 1239/06.10.2007 |
| 46. | FC Aziz Ur Rehman No.1051 | 07.07.1994 | 01-04-1971 | 1239/06.10.2007 |
| 47. | FC Sher Alam No. 1054 | 08.01.1995 | 02-10-1973 | 1239/06.10.2007 |
| 48. | FC Mohammad Tahir No.527 | 01.07.1990 | 07-12-1969 | 1243/06.10.2007 |
| 49. | FC Shahid Hussain No.986 | 01.09.1992 | 24-05-1967 | 1245/06.10.2007 |
| 50. | FC Najme Alam No.975 | 18.08.1991 | 07-04-1967 | 1255/06.10.2007 |
| 51. | FC Mohammad Tahir No.1043 | 07.07.1994 | 01-03-1971 | 1265/06.10.2007 |
| 52. | FC Mohammad Sajid No.916 | 02.08.1991 | 01-01-1972 | 1266/06.10.2007 |
| 53. | FC Fazal Habib No.789 | 07.12.1991 | 10-10-1993 | 1270/06.10.2007 |
| 54. | FC Lal Mohammad No.847 | 10.07.1991 | 02-10-1972 | 1276/06.10.2007 |

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|------|----------------------------|------------|------------|-----------------|
| 55. | FC Imtiaz No.721 | 24.08.1989 | 05.04.1971 | 1277/06.10.2007 |
| 56. | FC Inwan No.1056 | 28.09.1995 | 31-01-1971 | 1279/06.10.2007 |
| 57. | FC Saleem Javid No.541 | 17.07.1991 | 15-02-1969 | 1280/06.10.2007 |
| 58. | FC Iftikhar Hussan No.495 | 01.07.1990 | 29-04-1970 | 1286/06.10.2007 |
| 59. | FC Nawab Ali No.834 | 09.07.1991 | 07-02-1965 | 1286/06.10.2007 |
| 60. | FC Idrees Khan No.658 | 03.07.1996 | 25-02-1977 | 376/12.04.2008 |
| 61. | FC Amjid Ali No.567 | 01.07.1990 | 15-05-1972 | 470/10.05.2008 |
| 62. | FC Farhad Ali No.1005 | 05.07.1993 | 06-03-1968 | 524/13.05.2008 |
| 63. | FC Shah Hassan No.296 | 09.07.1998 | 26-09-1978 | 524/13.05.2008 |
| 64. | FC Mohammad Ayub No.339 | 18.12.1994 | 01-06-1976 | 803/26.06.2008 |
| 65. | FC Said Ali Shah No.502 | 01.04.1999 | 13-02-1979 | 954/23.07.2008 |
| 66. | FC Ijaz Ul Haq No.604 | 01.07.1990 | 05.03.1972 | 957/24.07.2008 |
| 67. | FC Muhsin Raza No.472 | 28.08.1995 | 20-05-1976 | 1758/18.12.2008 |
| 68. | FC Liaqat Ali No.958 | 10.10.1990 | 01-04-1971 | 1762/18.12.2008 |
| 69. | FC Fazal Mohammad No.1277 | 05.07.1993 | 03.01.1974 | 143/21.01.2009 |
| 70. | FC Nasir Khan No.1016 | 26.05.1999 | 10-01-1975 | 679/11.04.2009 |
| 71. | FC Shujat No.806 | 06.07.1998 | 05-05-1977 | 950/30.05.2009 |
| 72. | FC Arshid Ali No.1112 | 31.01.2002 | 22-07-1981 | 957/02.06.2009 |
| 73. | FC Ghaffar Ali No.433 | 15.01.1995 | 03-04-1969 | 1300/24.06.2009 |
| 74. | FC Wazir Jamal No.517 | 01.07.1990 | 12-05-1970 | 1301/24.06.2009 |
| 75. | FC Mohammad Javid No.169 | 08.07.1998 | 02-06-1974 | 1313/25.06.2009 |
| 76. | FC Islam Shah No.461 | 08.07.1998 | 28-07-1978 | 1315/25.06.2009 |
| 77. | FC Qaisar Zaman No.581 | 20.08.1991 | 15-09-1968 | 1319/25.06.2009 |
| 78. | FC Dost Mohammad No.799 | 08.07.1998 | 01-09-1977 | 1319/25.06.2009 |
| 79. | FC Zafrullah No.443 | 11.12.1990 | 02-06-1970 | 1323/25.06.2009 |
| 80. | FC Javid No.724 | 15.02.1996 | 09-04-1975 | 1323/25.06.2009 |
| 81. | FC Imran Khan No.159 | 09.07.1998 | 15-04-1980 | 1323/25.06.2009 |
| 82. | FC Shah Room No.246 | 11.11.1999 | 02-11-1977 | 1323/25.06.2009 |
| 83. | FC Hayat Khan No.883 | 23.09.1987 | 23-09-1967 | 359/31.03.2010 |
| 84. | FC Jawaz Khan No.696 | 20.03.1988 | 25-06-1967 | 491/13.05.2010 |
| 85. | FC Jahanzeb No.194 | 28.09.1995 | 12-02-1973 | 1048/24.09.2010 |
| 86. | FC Muhammad Kalam No.1310 | 25.05.2008 | 12-12-1986 | 41/06.01.2011 |
| 87. | FC Fazle Rehman No.1193 | 26.07.2007 | 03-03-1980 | 44/06.01.2011 |
| 88. | FC Mustahab Gul No. 1060 | 31.01.2002 | 13-01-1981 | 56/06.01.2011 |
| 89. | FC Ishfaq No.1257 | 26.07.2007 | 05-05-1987 | 76/10.01.2011 |
| 90. | FC Mukhtaj Ud Din No.460 | 01.07.1990 | 04-12-1970 | 393/16.03.2011 |
| 91. | FC Dawood Ur Rehman No.254 | 09.07.1998 | 15-11-1979 | 447/29.03.2011 |
| 92. | FC Adnan Khan No.610 | 07.08.1999 | 15-03-1981 | 669/16.05.2011 |
| 93. | FC Shakeel No.700 | 29.05.2007 | 10-02-1985 | 1040/21.07.2011 |
| 94. | FC Abdul Wajid No.589 | 22.07.1998 | 12-10-1975 | 1121/09.08.2011 |
| 95. | FC Niaz Ali No.137 | 13.07.1994 | 01-01-1970 | 1298/13.09.2011 |
| 96. | FC Sikandar Khan No.835 | 10.07.1991 | 16-01-1971 | 1369/23.09.2011 |
| 97. | FC Bahar Ali No.630 | 04.05.2006 | 21-04-1980 | 1431/03.09.2011 |
| 98. | FC Waheed Khan No.1142 | 22.07.1998 | 08-02-1974 | 1554/26.10.2011 |
| 99. | FC Jan Raz No.1069 | 31.01.2002 | 10-03-1980 | 1555/26.10.2011 |
| 100. | FC Anwar Mehmood NO.1304 | 01.08.2008 | 01-03-1985 | 1555/26.10.2011 |
| 101. | FC Amjid Khan No.294 | 01.04.1992 | 07-06-1972 | 1717/26.11.2011 |
| 102. | FC Mohammad Saleem No.492 | 01.07.1990 | 01-01-1969 | 1857/19.12.2011 |
| 103. | FC Manzoor Ullah No 624 | 09.07.1998 | 16-03-1975 | 1857/19.12.2011 |
| 104. | FC Arshid No.175 | 17.09.1999 | 31-12-1977 | 1857/19.12.2011 |
| 105. | FC Mohammad Shafiq No.168 | 11.12.1990 | 03-02-1969 | 1900/27.12.2011 |
| 106. | FC Waheed No.621 | 31.01.2002 | 03.03.1982 | 27/05.01.2012 |
| 107. | FC Misbah Ullah No.990 | 01.09.1992 | 13-03-1974 | 210/16.02.2012 |
| 108. | FC Sher Hassan No.1036 | 08.01.1995 | 24-03-1974 | 210/16.02.2012 |
| 109. | FC Sher Ajab No.937 | 24.04.1995 | 19-11-1972 | 210/16.02.2012 |
| 110. | FC Jan Mohammad No.1250 | 23.04.2004 | 14.04.1980 | 210/16.02.2012 |
| 111. | FC Nasrat Ali No.441 | 20.12.1999 | 20-10-1972 | 238/20.02.2012 |
| 112. | FC Sifat Ullah No.124 | 03.01.1996 | 23-03-1975 | 247/21.02.2012 |
| 113. | FC Nawsherawan No.330 | 09.07.1998 | 03-06-1975 | 312/07.03.2012 |

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|------|-----------------------------|------------|------------|-----------------|
| 114. | FC Amjid Ali No.127 | 19.07.1999 | 10.10.1977 | 312/07.03.2012 |
| 115. | FC Abid No.1183 | 26.07.2007 | 11-03-1987 | 312/07.03.2012 |
| 116. | FC Bakht Jehan No.641 | 01.02.1996 | 01-02-1973 | 326/09.03.2012 |
| 117. | FC Bakht Ali No.1035 | 19.04.1995 | 28-02-1975 | 390/19.03.2012 |
| 118. | FC Niaz Ali No.31 | 02.04.1995 | 06-02-1975 | 620/29.04.2012 |
| 119. | FC Alamzeb No.77 | 06.07.1998 | 15-09-1976 | 620/29.04.2012 |
| 120. | FC Niqab Gul No.400 | 08.07.1998 | 07.08.1975 | 661/11.05.2012 |
| 121. | FC Akbar Ali No.533 | 01.07.1990 | 03-03-1970 | 842/15.06.2012 |
| 122. | FC Mukhtyar Hussain No.796 | 19.03.1990 | 01-05-1970 | 877/27.06.2012 |
| 123. | FC Mohammad Zahir No.297 | 23.06.1996 | 02-03-1973 | 1102/30.08.2012 |
| 124. | FC Ahmad Anwar No.1163 | 07.11.1996 | 01-04-1976 | 1104/30.08.2012 |
| 125. | FC Khushdil No.833 | 10.07.1991 | 11-03-1973 | 1229/03.10.2012 |
| 126. | FC Changez Khan No.188 | 16.02.2002 | 03-08-1979 | 1245/03.10.2012 |
| 127. | FC Ishfaq No.218 | 05.07.1994 | 16-06-1975 | 1247/05.10.2012 |
| 128. | FC Ambar Shah No.747 | 19.09.1994 | 14-11-1975 | 1247/05.10.2012 |
| 129. | FC Zahoor No.869 | 09.07.1998 | 04.06.1976 | 1359/07.11.2012 |
| 130. | FC Gul Shah No.119 | 31.01.2002 | 13-07-1977 | 1369/12.11.2012 |
| 131. | FC Istikhar No.523 | 01.07.1990 | 05-04-1967 | 1391/27.11.2012 |
| 132. | FC Aurangzeb No.840 | 10.07.1991 | 02-12-1970 | 1391/27.11.2012 |
| 133. | FC Abdullah No.1229 | 26.07.2007 | 08-09-1985 | 1422/03.12.2012 |
| 134. | FC Wajid Ali No.780 | 04.05.2006 | 27-05-1977 | 199/06.02.2013 |
| 135. | FC Baz Mohammad No. 1270 | 16.11.2011 | 21.09.1972 | 341/12.03.2013 |
| 136. | FC Qasid Ali No.1311 | 26.05.2008 | 10-06-1985 | 346/12.03.2013 |
| 137. | FC Haider Zaman No.13 | 31.01.2002 | 12-03-1979 | 347/12.03.2013 |
| 138. | FC Gul Naras No. 777 | 16.10.1991 | 21-10-1968 | 381/20.03.2013 |
| 139. | FC Sohail No.1152 | 10.08.1999 | 04-04-1977 | 381/20.03.2013 |
| 140. | FC Bahri Karam No.548 | 13.07.1998 | 10-11-1976 | 392/21.03.2013 |
| 141. | FC Riaz Akbar No.1198 | 09.07.1998 | 09.04.1980 | 431/02.04.2013 |
| 142. | FC Mohammad Ayub No.51 | 29.05.2007 | 04-01-1982 | 444/04.04.2013 |
| 143. | FC Raj Wali No.21 | 09.07.1998 | 14-03-1974 | 467/05.04.2013 |
| 144. | FC Kazim Ali Shah No. 1074 | 27.02.2002 | 27-08-1978 | 467/05.04.2013 |
| 145. | FC Himayat Ali Shah No.1124 | 24.11.2003 | 05-02-1985 | 467/05.04.2013 |
| 146. | FC Zahid No.664 | 18.02.2002 | 13.03.1983 | 1067/19.08.2013 |
| 147. | FC Afsar Khan No.457 | 08.07.1998 | 20-03-1977 | 1871/03.12.2013 |
| 148. | FC Zia Ullah No.179 | 15.09.1996 | 10-04-1976 | 1881/03.12.2013 |
| 149. | FC Arif.No.286 | 11.09.2008 | 02-05-1990 | 1881/03.12.2013 |
| 150. | FC Fayaz No.708 | 28.06.1989 | 04-03-1970 | 1888/03.12.2013 |
| 151. | FC Hukam Zada No.946 | 12.08.1991 | 25-09-1971 | 1888/03.12.2013 |
| 152. | FC Abbas Khan No.1261 | 26.07.2006 | 01-01-1980 | 1888/03.12.2013 |
| 153. | FC Zul Hakeem No.1041 | 05.07.1994 | 14-12-1970 | 2001/04.12.2013 |
| 154. | FC Ibrahim Ullah No.628 | 01.10.2001 | 09.05.1979 | 2001/04.12.2013 |
| 155. | FC Amin Ali No.345 | 25.10.2004 | 06.04.1978 | 2091/12.12.2013 |
| 156. | FC Sarzamin No.342 | 31.01.2002 | 30-01-1980 | 2097/13.12.2013 |
| 157. | FC Shafi Ullah No.1027 | 15.06.1993 | 11-04-1971 | 2101/13.12.2013 |
| 158. | FC Habeeb Ur Rehman No.692 | 25.10.2004 | 28.11.1982 | 2101/13.12.2013 |
| 159. | FC Naseer Alam No.190 | 01.08.2008 | 09-02-1986 | 2101/13.12.2013 |
| 160. | FC Noor Subhan No.865 | 20.08.1999 | 11-01-1975 | 2106/13.12.2013 |
| 161. | FC Saif Ali No.1166 | 22.01.2007 | 12.08.1979 | 1452/18.12.2019 |

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PROMOTION LIST OF C-II HEAD CONSTABLE

| S. No. | Name & No. | Date of Birth | Date of appointmet | Date of Promotion | Overage Date |
|--------|------------------|---------------|--------------------|-------------------|--------------|
| 1. | Nasrullah 585 | 1970 | 01-07-1990 | 14-02-1996 | 2003 |
| 2. | Liaqat Ali 797 | 1970 | 19-03-1990 | 14-02-1998 | 2003 |
| 3. | Shah Hussain 571 | 1972 | 01-07-1990 | 14-02-1996 | 2005 |
| 4. | Abdur Rehman 50 | 1967 | 10-07-1991 | 18-02-1996 | 2005 |
| 5. | Tajbar 887 | 1969 | 11-07-1991 | 18-02-1996 | 2002 |
| 6. | Ihsan Ali 535 | 1967 | 01-07-1990 | 13-08-1996 | 2000 |
| 7. | Akhtar Gul 803 | 1970 | 31-03-1990 | 15-08-1996 | 2003 |
| 8. | Mehr Rehman 266 | 1962 | 24-12-1986 | 18-08-1997 | OK |
| 9. | Nabi Ullah 843 | 1967 | 10-07-1991 | 04-03-1998 | 2000 |
| 10. | Jamdad 583 | 1970 | 01-07-1990 | 04-03-1998 | 2003 |
| 11. | Mir Zaman 505 | 1969 | 01-07-1990 | 06-10-1998 | 2002 |
| 12. | Khan Zali 49 | 1968 | 15-09-1990 | 16-10-1996 | 2001 |
| 13. | Kajeer Zada 705 | 1970 | 27-06-1989 | 04-03-1998 | 2003 |
| 14. | Salih Mohd 763 | 1972 | 29-12-1994 | 17-10-1998 | 2005 |

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22

**OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA**

Tel No. 0923-9220102 & Fax No. 0923-9220103
Email Dpo_nowsherakpk@yahoo.com

ORDER

Consequent upon the recommendation of the Departmental Promotion Committee in its meeting held on 06-02-2017 in the office of the undersigned duly approved by the Worthy Deputy Inspector General of Police, Mardan Region-I Mardan vide his office Memo No.1381/ES, dated 15-02-2017, the following constables on promotion list (C-II) are hereby promoted to the rank of C-II Head Constables to BPS-07 (9220-510-24520) against the existing vacancies of C-II Head Constable with immediate effect:-

1. Muhammad Zeb No.412
2. Khanzali No.49
3. Muhammad Diyar No.377 ✓

OB No. 979

Dated: 07/07/2017

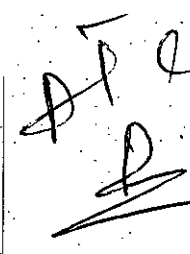

District Police Officer,
Nowshera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 6890-96 /EC, dated Nowshera, the 07/7/ /2017.

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

1. Deputy Inspector General of Police Mardan Region-I, Mardan to this office Order Endst: No.1732-40/EC, dated 17-02-2017.
2. SP Investigation Nowshera.
3. District Account Officer Nowshera.
4. DSP HQrs Nowshera.
5. Accountant
6. OHC.
7. FMC.





23

2017

**DISTRICT POLICE OFFICER,
NOWSHERA**

Tel No. 0923-9220102 & Fax No. 0923-9220103
Email Dpo_nowsherakpk@yahoo.com

ORDER

Consequent upon the recommendations of the Departmental Promotion Committee in its meeting held on 15-11-2017 in the office of the undersigned duly approved by the Worthy Deputy Inspector General of Police, Mardan Region-I Mardan vide his office Memo No.8545/ES, dated 21-11-2017, the following constables on promotion list (C-II) are hereby promoted to the rank of C-II Head Constables to BPS-07 (10990-610-29290) against the existing vacancies of C-II Head Constable with immediate effect:-

1. Saleh Muhammad No.763
2. Amir Zaman No.505

OB No. 1925

Dated. 23/11/2017

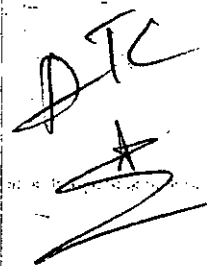

District Police Officer,
Nowshera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 14275-81 /EC, dated Nowshera, the 23-11- /2017.

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

1. Deputy Inspector General of Police Mardan Region-I Mardan w/r quoted above.
2. SP Investigation Nowshera.
3. District Accounts Officer, Nowshera.
4. DSP HQs Nowshera.
5. Accountant
6. OHC.
7. FMC.



24

**OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA**

Tel No. 0923-9220102 & Fax No. 0923-9220103
Email Dpo_nowsherakpk@yahoo.com

2020

ORDER

Consequent upon the recommendation of the Departmental Promotion Committee in its meeting held on 17-12-2019 in the office of the undersigned duly approved by the Worthy Deputy Inspector General of Police, Mardan Region-I Mardan vide his office Memo No.14437/ES, dated 26-12-2019, C-II Constable Murad Ali No.827 is hereby promoted to the rank of Offg: C-II Head Constable to BPS-09 (11770-730-33670) against the existing vacancy of C-II Head Constable with immediate effect.

OB No 372

Dated 04/05 /2020

District Police Officer,
Nowshera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 8640-44 /EC, dated Nowshera, the 5 / 5 /2020.

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

1. Deputy Inspector General of Police Mardan Region-I Mardan w/r to above.
2. District Accounts Officer, Nowshera.
3. Pay Officer.
4. OHC.
5. FMC.

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REFERENCE ATTACHED

25

R/Sir,

It is submitted that as per report of OHC Nowshera 01 vacancy in the rank of C-II Head Constable is available in this district, which needs to be fulfilled.

It is bring into your kind notice that on 17-12-2019 a DPC of 02 C-II List Constables for promotion to the rank of C-II Head Constable was held in your good office and which 01 C-II Constable is promoted as C-II Head Constable, while 01 is on waiting list for promotion to the rank of C-II Head Constable (DPC attached) and 01 C-II Constable is required to be promoted as C-II Head Constable.

If your good self agreed may promote C-II Constable Murad Ali No.827 on the vacant post of C-II Head Constable on seniority basis.

Submitted for further order please.

HC/DPO/NSR

Alhove
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EC/NSR

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جاری

تفریق حکم میں مورخہ 23/9/87ء سے تفریق کا پتہ دی گئی ہے۔
اس کے علاوہ عدالت نے مورخہ 23/9/87ء سے تفریق کا حکم دیا ہے۔
میں نے مورخہ 1991ء میں اٹھان کے دن میں اس کے متعلق 1994، 95، 96ء میں ایک
بی۔ون میں لکھا ہے۔ مگر اس سے کوئی اثر نہیں ہے۔

لہذا بذریعہ درخواستیں اس میں تفریق کو مد نظر رکھ کر
کا حکم صادر فرمادیں۔

عین کواریش جوتی
تقریب 17/9/87

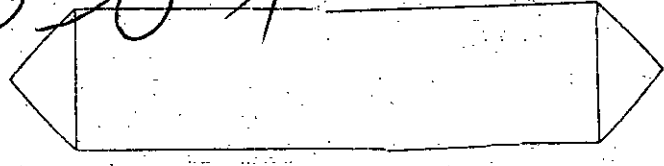
العارض

کابینہ صبا کا نمبر 715 متعلق تفریق کا حکم جاری ہے۔
حال متعلق نوٹ کر لیں۔

forwarded
Alumini
T. - CHD

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بعدالت
مستور و اسرار



2021ء منجانب
بنام
صیفا خان

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے اس کی توثیق کا کاروبار کے لئے
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے
اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted
Date

2021ء
ماہ
الرقوم

العبد
مقام
کے لئے منظور ہے۔

صیفا خان
Cmic- 17201-7040703-3
Mob- 0307-5774702

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

Service Appeal No. 5738/2021.

Constable Hayat Khan No. 883,
Reader DSP/HQrs., Nowshera

.....Appellant

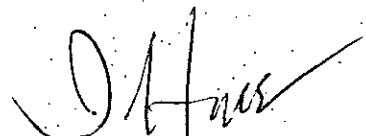
V E R S U S

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others.

.....Respondents

I N D E X

| S.No. | Description of documents | Annexure | Pages |
|-------|---|----------|-------|
| 1. | Reply of Respondents | - | 1-3 |
| 2. | Affidavit | - | 04 |
| 4. | Detail of report of the then DSP Hqrs:
Charsadda with better copy. | A | 05 |
| 5. | Copy of suspension order with better
copy | B | 06 |
| 6. | Copy of standing order | C | 07-08 |
| 7. | Copies of orders of constitution of
committee, recommendation/minutes of
DPC, approval and promotion. | D | 09-12 |
| 8. | Copy of list of C-II Constables | E | 13-15 |
| 9. | Copy of C-II Head Constables | F | 16 |


**Inspector Legal,
Nowshera**

BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 5738/2021

Constable Hayat Khan No. 883,
Reader DSP/HQrs:, Nowshera

.....Appellant

V E R S U S

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Secretry Finance Government of Khyber Pakhtunkhwa, at Civil Secretariat, Peshawar.
3. Deputy Inspector General of Police, Mardan Region-I, Mardan.
4. District Police Officer, Nowshera.
5. Regional Police Officer (RPO), Mardan.
6. Talwar Ali Shah No. 696 Police Lines, Nowshera.
7. Faiz Muhammad /FC No. 600 Police Lines, Nowshera.

.....Respondents

REPLY ON BEHALF OF RESPONDENTS No. 01 to 05

Respectfully Sheweth: -

PRELIMINARY OBJECTIONS: -

1. That the appellant has got no cause of action and locus standi to file the instant appeal.
2. That the appeal is badly barred by law and limitation.
3. That the appellant is estopped by his own conduct to file the instant appeal.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to the Honourable Tribunal with clean hands.
6. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.

Reply on Facts: -

1. Correct to the extent that the appellant was employee of respondent department but his performance during service was not upto the mark as explained in the following para.
2. Incorrect. Appellant had been recommended for confinement to quarter guard for 03 days by the then DSP Hqrs: Charsadda as and during the visit of DSP Hqrs: on 26-12-2001, appellant was found negligent towards his official duty. Similarly, appellant was also found involved in case vide FIR No. 636 dated 04-08-2009 u/s 223/224/225/34 PPC Police Station, Nowshera Cantt: as 02 accused who were Afghan National and were charged in a case vide FIR No. 686 dated 03-08-2009 u/s 14 F.A Police Station, Pabbi, escaped from his custody, for the said reason appellant was suspended. (Copy of report of the then DSP Hqrs: Charsadda is annexure "A" and Copy of suspension order is annexure "B").

2-219/25

3. Incorrect. Appellant has not been ignored by replying respondents; rather, he will be promoted on his own turn. The appellant name was brought on seniority list of C-II Constable on 31-03-2010, while names of respondent No. 06 & 07 were brought on seniority list of C-II Constables on 28-01-2000 and 19-03-2002 respectively, so respondent No. 6 & 7 stood senior to the appellant. As per para 05 of Standing Order No. 06/2014. **“Seniority of Constables placed on list C-II shall be determined from the date of entry into the promotion list C-II”**. (Copy of standing order is annexure “C”).
4. Incorrect. The order of promotion was passed by the competent authority in accordance with law/rules and seniority, respondent No. 6 & 7 were promoted on their own turn of seniority. It is worth to mention here that for making such promotion, a committee was constituted by the Regional Police Officer, the said committee held meeting to examine the suitability of list C-II constables for promotion to the rank of C-II Head Constables. Recommendations of the Departmental Promotion Committee were forwarded to the Regional Police Officer for approval and after approval, C-II constables were promoted to the rank of C-II Head Constable. (Copies of order of constitution of committee, recommendation/minutes of DPC, approval of recommendations by Regional Police Officer and promotion order are annexed as annexure “D”).
- Appellant moved departmental appeal on 26-02-2021 to respondent No. 03 but the same was filed as appellant could not be given out of turn promotion, rather, will be promoted on his own turn.
- 5&6 Appeal of the appellant is maintainable and liable to be dismissed inter-alia on the following grounds: -


Reply on GROUNDS

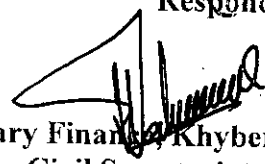
- A. Incorrect. Appellant was treated in accordance with law, rules and policy. In the current list of C-II constables, maintained by the District, appellant was at serial No. 67 and will be promoted on his own turn as per policy/rules in vogue.
- B. Incorrect. For promotion of C-II Constables and subsequent C-II Head Constable, a proper mechanism has been devised in shape of standing order No. 06/2014. As per para No. 05 of the ibid standing order, seniority of constables placed on list C-II shall be determined from the date of entry into the promotion list C-II. In the C-II list, respondent No. 06 & 07 stood senior to the appellant as name of respondent No. 06 was brought on promotion list C-II on 28-01-2000, similarly, name of respondent No. 07 was brought on the ibid list on 19-03-2002 while name of the appellant was brought on the said list on 31-03-2010, therefore, respondent No. 06 & 07 were promoted as C-II Head Constables before the appellant. (Copy of list of C-II Constables is annexure “E” and Copy of C-II Head Constables is annexure “F”).

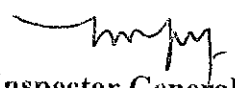
- C. Incorrect. As discussed above, seniority of C-II constables is not counted from the date of appointment rather determined from the date of entry into the promotion list C-II.
- D. Incorrect. Departmental appeal of the appellant was lawfully filed by respondent No. 05 as appellant could not be granted out of turn promotion.
- E. Incorrect. As appeal of the appellant was completely devoid of merit, therefore; the same could not be entertained hence, was filed.
- F. Incorrect. Respondent No. 06&07 were promoted as C-II Head Constables on their own turn.
- G. Incorrect. As stated in the preceding paras that departmental appeal of the appellant was devoid of merit, therefore; his appeal could not be entertained. It is worth to mention that in the present list of C-II Constables, appellant stands at serial No. 67 hence, will be considered as C-II Head Constable on his own turn.
- H. Incorrect. Seniority of Constables placed on list C-II is determined from the date of entry into the promotion list C-II as per Standing Order No. 06/2014. As in the said list respondent No. 6&7 stood senior to the appellant, therefore; they were promoted as C-II Head Constables.
- I. Para already explained above.
- J. Incorrect. Already explained above.
- K. The appellant has no locus standi and cause of action.
- L. The respondents also seek permission of this Honourable Tribunal to advance additional grounds at the time of arguments.


Prayers

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


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


Secretary Finance, Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
Respondent No. 02


Deputy Inspector General of Police,
Mardan Region-I, Mardan.
Respondent No. 03&05


District Police Officer,
Nowshera.
Respondent No.04

(4)

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

Service Appeal No. 5738/2021

Constable Hayat Khan No. 883,
Reader DSP/HQrs., Nowshera

.....Appellant

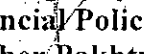
V E R S U S

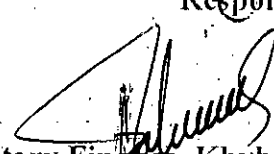
1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Secrety Finance Government of Khyber Pakhtunkhwa, at Civil Secretariat,
Peshawar.
3. Deputy Inspector General of Police, Mardan Region-I, Mardan.
4. District Police Officer, Nowshera.
5. Regional Police Officer (RPO), Mardan.
6. Talwar Ali Shah, No. 696 Police Lines, Nowshera.
7. Faiz Muhammad /FC No: 600 Police Lines, Nowshera.

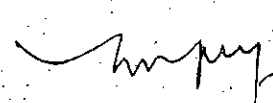
.....Respondents

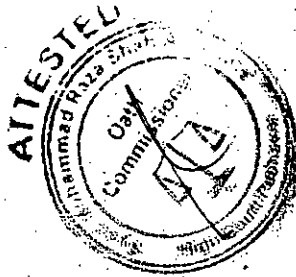
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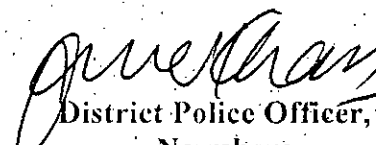
We the respondents No. 01 to 05 do hereby solemnly affirm and declare on Oath that the contents of reply to the appeal are true and correct to the best of our knowledge and belief and nothing has been concealed from the Honourable tribunal.


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


Secretary Finance, Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
Respondent No. 02


Deputy Inspector General of Police,
Mardan Region-I, Mardan.
Respondent No. 03&05




District Police Officer,
Nowshera.
Respondent No.04

⑤ Annex "A"

Better Copy

EXTRACT FROM REGISTER NO, 13 INFORMAL INSPECTION
OF POLICE STATION, PRANG CARRIED OUT BY MR.
RUIDAR HUSSAIN DSP/HQRS: CHARSADDA ON 26-12-2001.

On my surprise visit to the Police Station at 1850 hours, I was astonished to observe that no one inside the Police Station building was found present. Even sentry was absent and the Moharrar office was vacant. After a few minutes MHC Shah Nawaz and a uniformed constable (Shahidullah No. 661) came out of the Police Station Mosque. On my enquiry MHC stated that he was offering Isha prayer and Hayat Muhammad Madad Muharrar No. 715 was left behind in the office. Sentry Shahidullah No. 661 and MM Hayat Muhammad No. 715 leaving the Police Station on the mercy of God had gone for prayer and outside respectively. On my entrance to Police Station, none was present to receive telephone call which was ringing by quite some time and was attended by gunner.

The attitude of FC Shahidullah No. 661 and MM Hayat Muhammad No. 715 towards their duties amounts to misconduct. They both are recommended for confinement to quarter guard for 03 days.

Sd/-

(RUIDAR HUSSAIN KHAN)
Deputy Superintendent of Police,
Head Quarters, Charsadda.

Annex: A)

INVESTIGATION REPORT NO. 15
FILE NO. 1175-012
BY MR. RAJESH
DATE: 29.12.2001

On 28/12/2001 at 10:30 AM, Station t
1000-2000, I was authorized to observe that on 28/12/2001 inside the
Police Station building was found present. The station was
closed on the 28/12/2001. At 10:30 AM, Station t
1000-2000 and a number of people (including No. 651)
came out of the Police Station building. On 28/12/2001,
Station t that he was offering "Basmala" prayer. At 10:30 AM, Station t
1000-2000 No. 715 was left locked in the office. Station t
1000-2000 No. 651 and Station t Subhama No. 715 were in
the Police Station on the mercy of police. On 28/12/2001,
Station t side respectively. On 28/12/2001, Police Station
1000-2000 was present to receive telephone call. Station t ringing
for quite some time and was attended by guard.

The attitude of Station t No. 651 and
Station t No. 715 towards their duties was not to
be commended. They both were recommended for confinement to
quarter guard for three days.

(Signature)
Date: 27-12-2001

W/S.F.

1175-012
29.12.2001

W/S.F.
27-12-2001

OB NO 1175
at 28-12-2001

Siv

Submitted for file

Perused & ordered.

W/S.F.

27-12-2001

ORDER

Being found involved in case FIR No. 636 dated 04.8.2009 u/s 223/224/225/34 PPC Police Station Nowshera Cantt., the following Police officials are hereby placed under suspension and closed to Police lines with immediate effect :-

1. LHC Alamgir No.706
2. FC Hayat Khan No.883

Charge Sheet & statement of Allegations will be issued to them separately.

OB No. 1511

Dated 6.8./2009.

**District Police Officer,
Nowshera.**

No. 3069-74 /PA, Dated Nowshera, the 6.8./2009.

Copy of for information and necessary action to the :-

1. ASP Hqrs: Nowshera.
2. DSP Pabbi.
3. Pay Officer.
4. Establishment Clerk.
5. O.H.C.
6. E.M.C.

Annex B

ORDER

Being found involved in case FIR No. 636 dated 04-08-2009 u/s 223/224/225/34 PPC Police Station, Nowshera Cantt: the following Police Officials are hereby placed under suspension and close to Police Lines, with immediate effect: -

1. LHC Alamgir No. 706
2. FC Hayat Khan No. 883

Charge sheet & statement of allegations will be issued to them separately.

OB No .1511
Dated 06-08-2009.

Sd/-
**District Police Officer,
Nowshera.**

No. 3069-74/PA, dated Nowshera the 06-08-2009.

Copy for information and necessary action to the: -

1. ASP Hqrs: Nowshera.
2. DSP Pabbi.
3. Pay Officer.
4. Establishment Clerk
5. OHC
6. FMC



(7) Annex C 3

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

Such
FF De

STANDING ORDER NO. 6/2014

Promotion of Constables as C-II Head Constables

This Standing Order is issued under Article 10(3) of Police Order 2002 in pursuance of the Police Policy Board decision taken in its 11th meeting held on 21st August 2014.

2. **Aim:-** This Standing Order aims to streamline and standardize the criteria and procedure of placement of Constables on promotion List C-II and their subsequent promotion as C-II Head Constables.
3. **Placement on C-II List:-** Those Constables who have crossed the age limit prescribed for A-1/B-1 Exams without qualifying the same may be considered for placement on promotion List C-II.
4. A Selection Board at the District level, constituted by CCPO or RPO, as the case may be, and consisting of the DPO concerned (SSP Operations in case of District Peshawar) and two other officers not less than the rank of SP, may consider Constables for placement on C-II list as per the following criteria:
 - a. Outstanding performance;
 - b. Good general reputation.
5. **Procedure:-** Seniority of Constables placed on List C-II shall be determined from the date of entry into the promotion List C-II.
6. The Selection Board constituted under section 4 above may recommend to CCPO or RPO, as the case may be, Constables placed on C-II List for promotion as Head Constables in accordance with the following criteria:
 - a. Seniority-cum-outstanding performance;
 - b. Good general reputation.
7. After approval of CCPO or RPO, as the case may be, the DPO (SSP Operations in case of Peshawar) shall promote such Constables as C-II Head Constables.
8. **Promotion of Constables as C-II Head Constables on reaching superannuation:-** A large number of Constables retire without being promoted as Head Constables. Such Constables deserve to be promoted as C-II Head Constables, before their superannuation, in recognition of their long-standing services for the Police department.
 - 8.1 The criteria and procedure given in section 3 to 7 above shall not apply to the promotion of Constables promoted as C-II Head Constables on superannuation. Instead,

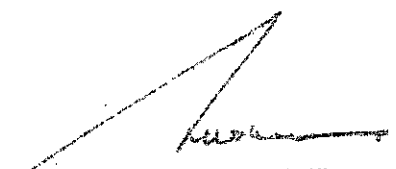
Constables shall be promoted, in line with the IGP Policy Guidelines No. 04/2013 dated 27 December 2013 according to the following procedure:

- a. The District Head of Police or the Head of a Police Unit, as the case may be, shall place the name of a Constable on promotion List C-II on the first day of the last six months before the date of his superannuation.
- b. Once the name of a constable has been placed on promotion List C-II under section 8.1 (a), the District Head of Police or the Head of a Police Unit, as the case may be, shall promote the Constable as Head Constable (C-II) on the first day of the last three months before the date of his superannuation.
- c. **This procedure shall not apply to constables going on LPR.**
- d. The District Head of Police or the Head of Police Unit, as the case may be, shall maintain a list of all Constables well before their superannuation.

Only upto 10% of the vacancies of Head Constables in a District or Unit, as the case may be shall be filled through promotion from List C-II. In any case, such promotions shall not exceed 10% of the total vacancies of Head Constables in a District or Unit.

Power to remove difficulties:- If any difficulty arises in giving effect to this order, the Provincial Police Officer may by notification make such provisions as deemed appropriate.


Amendment:- All previous Standing Orders on the subject, to the extent of the provisions of this order, shall stand amended.


(NASIR KHAN DURRANI)
 Provincial Police Officer
 Khyber Pakhtunkhwa
 Peshawar

No:- 428-91/GB dated Peshawar the 14th September 2014

Copy of the above is forwarded for information and necessary action to:

1. All Heads of Police Offices in Khyber Pakhtunkhwa;
2. PRO to PPO;
3. Registrar CPO.


(MUBARAK ZEB) PSP
 DIG Headquarters
 Khyber Pakhtunkhwa
 Peshawar

Annex - D

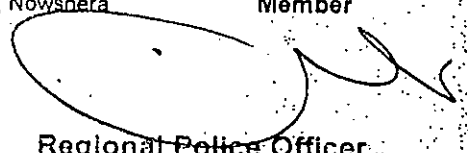
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ORDER

In pursuance of Standing Order No. 6/2014 a Committee comprising the following Police Officers is constituted to check suitability of C-II Constable of Nowshera District for promotion as C-II Head Constable in the light of Standing order No. 06/2014:-

- | | | | |
|----|-------------------------------------|----------------------------|----------|
| 1. | Capt. @ Najmul Hasnain Liaqat (PSP) | DPO/Nowshera | Chairman |
| 2. | Mr. Noor Jamal Khan | SP Investigation, Nowshera | Member |
| 3. | Mr. Saif Ali | DSP/Hqs, Nowshera | Member |


Regional Police Officer,
Mardan.

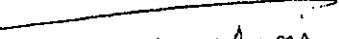
No. 520-21/ES,

Dated Mardan the 28-01-2021.

Copy forwarded for information and necessary action to the:
District Police Officer, Nowshera w/r to his office Memo: No. 512/EC dated 15.01.2021.

2. Superintendent of Police Investigation, Nowshera.
(****)


EC



For 21/01/2021
↓
DPO NSR
28/1/2021


MINUTES OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON 03-02-2021

Meeting of the Departmental Promotion Committee was held in the office of the undersigned on 03-02-2021 to examine the suitability of list (C-II) constables for promotion to the rank of (C-II) Head Constable vide Regional Police Officer, Mardan office Order Endst: No.520-21/ES, dated 28-01-2021. The cases of the following 07 (C-II) constables according to seniority list were considered and decisions were taken as noted against each their names:-

| S# | NAME & NO. | DECISION TAKEN |
|----|----------------------------------|---|
| 1. | Talwar Ali Shah No.696 | Promoted |
| 2. | Raj Bahadar No.128/PTS Swabi | Promoted |
| 3. | Iftikhar No.392/FRP | Promoted |
| 4. | Faiz Muhammad No.600 | Promoted |
| 5. | Fajid Ur Rahman No.87 | Will be promoted subject to the availability of vacancy |
| 6. | Iltaf Hussain No.172/CTD/189/NSR | Will be promoted subject to the availability of vacancy |
| 7. | Iqtidar Ahmad No.603 | Will be promoted subject to the availability of vacancy |


(NOOR JAMAL KHAN)
SP Inv: Nowshera
(MEMBER)


(SAIF ALI KHAN)
DSP HQrs Nowshera
(MEMBER)


(Capt: (R) NAJMUL HASNAIN LIAQAT) PSP
District Police Officer, Nowshera
(CHAIRMAN)

113

Government of Khyber Pakhtunkhwa
Office of the Regional Police Officer,
Mardan
Phone No. 0937-9230113, Fax No. 0937-9230115.
Email Address: - esrpomardan@gmail.com

To The District Police Officer,
Nowshera.

No. **737** /ES, dated Mardan Region, the **09-10/2021.**

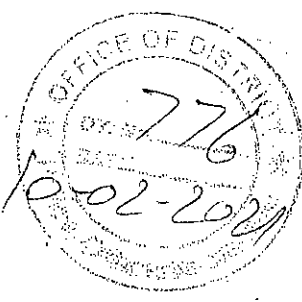
Subject: MINUTES OF DEPARTMENTAL PROMOTION COMMITTEE.

Memo: Reference your office Memo: No. 1254/EC dated 03.02.2021 on
the subject noted above.

Recommendation of the Departmental Promotion Committee held
on 28.01.2021 for list C-II Head Constable of Nowshera District is hereby
approved

[Handwritten Signature]
Regional Police Officer,
Mardan.
Ali

Ee
For inspection
[Signature]
12/21/2021



LIST OF C-II CONSTABLES

| S.No | Name & No | D/O Enlistment | D/O Birth | Date of promotion
List C-II with OB No |
|------|--------------------------|----------------|------------|---|
| 1. | FC Zar Badshah No.673 | 20.06.1988 | 01.05.1969 | 1110/05.11.2002 |
| 2. | FC Zalam Khan No.770 | 08.12.1988 | 27-02-1967 | 1273/23.12.2002 |
| 3. | FC Mughalbaz No.424 | 15.07.1985 | 15.07.1967 | 1303/28.12.2002 |
| 4. | FC Aurangzeb No.832 | 16.10.1991 | 12-07-1971 | 156/10.02.2003 |
| 5. | FC Naeem Ullah No.99 | 13.03.1991 | 30-12-1970 | 214/01.03.2003 |
| 6. | FC Zar Ali No.794 | 17.03.1990 | 27-04-1968 | 215/01.03.2003 |
| 7. | FC Imrad Ali No.549 | 01.07.1990 | 02-02-1970 | 409/15.04.2003 |
| 8. | FC Ibrahim No.516 | 01.07.1990 | 07-04-1969 | 415/15.04.2003 |
| 9. | FC Jan Wali No.575 | 01.07.1990 | 14-03-1968 | 450/22.04.2003 |
| 10. | FC Farzand Ali No.748 | 17.07.1988 | 15-04-1966 | 554/08.05.2003 |
| 11. | FC Abdul Wali No.519 | 01.07.1990 | 20-09-1966 | 581/17.05.2003 |
| 12. | FC Sajjad Akhtar No.903 | 11.04.1991 | 11.04.1969 | 616/25.05.2003 |
| 13. | FC Abdul Rauf No.314 | 17.01.1981 | 03-05.1963 | 639/30.05.2003 |
| 14. | FC Riaz Ahmad No.267 | 19.03.1987 | 19-06-1968 | 666/05.06.2003 |
| 15. | FC Aurangzeb No.980 | 12.08.1991 | 01-02-1968 | 667/05.06.2003 |
| 16. | FC Shamshad Ali No.927 | 12.08.1991 | 10-10-1971 | 895/18.07.2003 |
| 17. | FC Ayaz Ali No.994 | 01.10.1992 | 08.01.1972 | 896/18.07.2003 |
| 18. | FC Riaz Ali No.374 | 03.07.1985 | 13-12-1966 | 921/19.07.2003 |
| 19. | FC Sher Bahader No.445 | 25.09.1990 | 15-11-1969 | 988/18.03.2003 |
| 20. | FC Shoukat Hayat No.680 | 08.12.1988 | 05-01-1969 | 648/29.07.2004 |
| 21. | FC Ishfaq No.947 | 24.08.2000 | 12-04-1978 | 835/14.10.2004 |
| 22. | FC Mohammad Tahir No.307 | 22.08.1982 | 02-01-1964 | 15/05.01.2005 |
| 23. | FC Barkat Ali No.1057 | 26.06.1993 | 16-06-1973 | 57/14.01.2005 |
| 24. | FC Saif Ali No.757 | 18.10.1995 | 01-07-1977 | 125/17.02.2005 |
| 25. | FC Tariq Ahmad No.459 | 01.07.1990 | 04.12.1970 | 428/14.06.2005 |
| 26. | FC Ziladar No.29 | 29.12.1994 | 03.05.1974 | 546/11.07.2005 |
| 27. | FC Abdul Awal No.27 | 26.06.1996 | 10-04-1976 | 524/15.06.2006 |
| 28. | FC Bacha Khan No.717 | 08.12.1988 | 30-03-1970 | 104/01.02.2007 |
| 29. | FC Meher Rehman No.1135 | 26.06.1996 | 03.04.1975 | 139/08.02.2007 |
| 30. | FC Amjid Ghafar No.39 | 01.07.1985 | 10-05-1967 | 188/24.02.2007 |
| 31. | FC Amin Khan No.251 | 20.11.1991 | 03-11-1973 | 1212/05.10.2007 |
| 32. | FC Waheed Ullah No.431 | 01.12.1986 | 01-12-1968 | 1226/05.10.2007 |
| 33. | FC Parveez Gul No.956 | 01.09.1992 | 05.05.1971 | 1235/06.10.2007 |
| 34. | FC Riaz Gul No.735 | 30.03.1994 | 23-05-1973 | 1239/06.10.2007 |
| 35. | FC Sher Alam No. 1054 | 08.01.1995 | 02-10-1973 | 1239/06.10.2007 |
| 36. | FC Shahid Hussain No.986 | 01.09.1992 | 24-05-1967 | 1245/06.10.2007 |
| 37. | FC Maqbali No.671 | 26.12.1990 | 12.10.1968 | 1245/06.10.2007 |
| 38. | FC Najme Alam No.975 | 18.08.1991 | 07-04-1967 | 1255/06.10.2007 |
| 39. | FC Mamraiz No.24 | 19.08.1999 | 11.04.1981 | 1256/06.10.2007 |
| 40. | FC Mohammad Sajid No.916 | 02.08.1991 | 01-01-1972 | 1266/06.10.2007 |
| 41. | FC Fazal Habib No.789 | 07.12.1991 | 10-10-1993 | 1270/06.10.2007 |
| 42. | FC Lal Mohammad No.847 | 10.07.1991 | 02-10-1972 | 1276/06.10.2007 |
| 43. | FC Imtiaz No.721 | 24.08.1989 | 05.04.1971 | 1277/06.10.2007 |

(12)
2021

**OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA**

Tel No. 0923-9220102 & Fax No: 0923-9220103
Email Dpo_nowsherakpk@yahoo.com

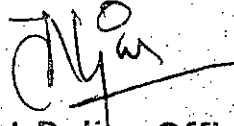
ORDER

Consequent upon the recommendation of the Departmental Promotion Committee in its meeting held on 03-02-2021 in the office of the undersigned duly approved by the Worthy Deputy Inspector General of Police, Mardan Region-I Mardan vide his office Memo No.737/ES, dated 09-02-2021, the following C-II Constables are hereby promoted to the rank of Offg: C-II Head Constable to BPS-09 (11770-730-33670) against the existing vacancies of C-II Head Constable with immediate effect:-

1. Talwar Ali Shah No.969
2. Raj Bahadar No.128/PTS Swabi
3. Muhammad Iftikhar No.780/NSR/392/FRP
4. Faiz Muhammad No.600

OS No 168

Dated 11/02/2021


District Police Officer,
Nowshera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 1512-19/EC, dated Nowshera, the 11/02/2021.

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

1. Deputy Inspector General of Police Mardan Region-I Mardan w/r to above.
2. Commandant FRP, Khyber Pakhtunkhwa, Peshawar.
3. SP Investigation Nowshera.
4. Principal Police Training School, Swabi.
5. District Accounts Officer, Nowshera.
6. Pay Officer.
7. OHC.
8. FMC.

| | | | | |
|------|-----------------------------|------------|------------|-----------------|
| 93. | FC Sher Ajab No.937 | 24.04.1995 | 19-11-1972 | 210/16.02.2012 |
| 94. | FC Jan Mohammad No.1250 | 23.04.2004 | 14.04.1980 | 210/16.02.2012 |
| 95. | FC Nasrat Ali No.441 | 20.12.1999 | 20-10-1972 | 238/20.02.2012 |
| 96. | FC Sifat Ullah No.124 | 03.01.1996 | 23-03-1975 | 247/21.02.2012 |
| 97. | FC Nawsherawan No.330 | 09.07.1998 | 03-06-1975 | 312/07.03.2012 |
| 98. | FC Amjid Ali No.127 | 19.07.1999 | 10.10.1977 | 312/07.03.2012 |
| 99. | FC Abid No.1183 | 26.07.2007 | 11-03-1987 | 312/07.03.2012 |
| 100. | FC Bakht Jehan No.641 | 01.02.1996 | 01-02-1973 | 326/09.03.2012 |
| 101. | FC Bakht Ali No.1035 | 19.04.1995 | 28-02-1975 | 390/19.03.2012 |
| 102. | FC Alamzeb No.77 | 06.07.1998 | 15-09-1976 | 620/29.04.2012 |
| 103. | FC Niqab Gul No.400 | 08.07.1998 | 07.08.1975 | 661/11.05.2012 |
| 104. | FC Akbar Ali No.533 | 01.07.1990 | 03-03-1970 | 842/15.06.2012 |
| 105. | FC Mukhtyar Hussain No.796 | 19.03.1990 | 01-05-1970 | 877/27.06.2012 |
| 106. | FC Mohammad Zahir No.297 | 23.06.1996 | 02-03-1973 | 1102/30.08.2012 |
| 107. | FC Ahmad Anwar No.1163 | 07.11.1996 | 01-04-1976 | 1104/30.08.2012 |
| 108. | FC Khushdil No.833 | 10.07.1991 | 11-03-1973 | 1229/03.10.2012 |
| 109. | FC Changez Khan No.188 | 16.02.2002 | 03-08-1979 | 1245/03.10.2012 |
| 110. | FC Ishfaq No.218 | 05.07.1994 | 16-06-1975 | 1247/05.10.2012 |
| 111. | FC Ambar Shah No.747 | 19.09.1994 | 14-11-1975 | 1247/05.10.2012 |
| 112. | FC Zahoor No.869 | 09.07.1998 | 04.06.1976 | 1359/07.11.2012 |
| 113. | FC Gul Shah No.119 | 31.01.2002 | 13-07-1977 | 1369/12.11.2012 |
| 114. | FC Istikhar No.523 | 01.07.1990 | 05-04-1967 | 1391/27.11.2012 |
| 115. | FC Abdullah No.1229 | 26.07.2007 | 08-09-1985 | 1422/03.12.2012 |
| 116. | FC Wajid Ali No.780 | 04.05.2006 | 27-05-1977 | 199/06.02.2013 |
| 117. | FC Baz Mohammad No. 1270 | 16.11.2011 | 21.09.1972 | 341/12.03.2013 |
| 118. | FC Qasid Ali No.1311 | 26.05.2008 | 10-06-1985 | 346/12.03.2013 |
| 119. | FC Haider Zaman No.13 | 31.01.2002 | 12-03-1979 | 347/12.03.2013 |
| 120. | FC Gul Naras No. 777 | 16.10.1991 | 21-10-1968 | 381/20.03.2013 |
| 121. | FC Sohail No.1152 | 10.08.1999 | 04-04-1977 | 381/20.03.2013 |
| 122. | FC Bahri Karam No.548 | 13.07.1998 | 10-11-1976 | 392/21.03.2013 |
| 123. | FC Riaz Akbar No.1198 | 09.07.1998 | 09.04.1980 | 431/02.04.2013 |
| 124. | FC Mohammad Ayub No.51 | 29.05.2007 | 04-01-1982 | 444/04.04.2013 |
| 125. | FC Raj Wali No.21 | 09.07.1998 | 14-03-1974 | 467/05.04.2013 |
| 126. | FC Kazim Ali Shah No. 1074 | 27.02.2002 | 27-08-1978 | 467/05.04.2013 |
| 127. | FC Himayat Ali Shah No.1124 | 24.11.2003 | 05-02-1985 | 467/05.04.2013 |
| 128. | FC Zahid No.664 | 18.02.2002 | 13.03.1983 | 1067/19.08.2013 |
| 129. | FC Afsar Khan No.457 | 08.07.1998 | 20-03-1977 | 1871/03.12.2013 |
| 130. | FC Zia Ullah No.179 | 15.09.1996 | 10-04-1976 | 1881/03.12.2013 |
| 131. | DFC Arif No.286 | 11.09.2008 | 02-05-1990 | 1881/03.12.2013 |
| 132. | FC Fayaz No.708 | 28.06.1989 | 04-03-1970 | 1888/03.12.2013 |
| 133. | FC Hukam Zada No.946 | 12.08.1991 | 25-09-1971 | 1888/03.12.2013 |
| 134. | FC Abbas Khan No.1261 | 26.07.2006 | 01-01-1980 | 1888/03.12.2013 |
| 135. | FC Ibrahim Ullah No.628 | 01.10.2001 | 09.05.1979 | 2001/04.12.2013 |
| 136. | FC Amin Ali No.345 | 25.10.2004 | 06.04.1978 | 2091/12.12.2013 |
| 137. | FC Sarzamin No.342 | 31.01.2002 | 30-01-1980 | 2097/13.12.2013 |
| 138. | FC Shafi Ullah No.1027 | 15.06.1993 | 11-04-1971 | 2101/13.12.2013 |
| 139. | FC Naseer Alam No.190 | 01.08.2008 | 09-02-1986 | 2101/13.12.2013 |
| 140. | FC Noor Subhan No.865 | 20.08.1999 | 11-01-1975 | 2106/13.12.2013 |
| 141. | FC Saif Ali No.1166 | 22.01.2007 | 12.08.1979 | 1452/18.12.2019 |

Police Department

District Nowshera

LIST OF C-II/ HEAD CONSTABLES

| S.No | Name & No | D/O Enlistment | Date of promotion
List C-II | Date of Promotion
C-II HC | Remarks |
|------|---------------------------|----------------|--------------------------------|------------------------------|---|
| 1. | HC Hazrat Shah No.646 | 10-05-1986 | 461/06-05-1992 | 906/19-07-2003 | Promoted to the rank of Head Constable according to standing order No 06/2014 on seniority basis. |
| 2. | HC Shah Hussain No.571 | 01.07.1990 | 189/14.02.1996 | 1535/11.12.2014 | |
| 3. | HC Abdul Rehman No.50 | 10.07.1991 | 210/18.02.1996 | 1535/11-12-2014 | |
| 4. | HC Tajbar Khan No.887 | 11.07.1991 | 210/18.02.1996 | 1535/11-12-2014 | |
| 5. | HC Ihsan Ali No. 535 | 01.07.1990 | 810/13.08.1996 | 1535/11-12-2014 | |
| 6. | HC Akhtar Gul No.803 | 31.03.1990 | 837/15.08.1996 | 1535/11-12-2014 | |
| 7. | HC Meher Rehman No.266 | 24.12.1986 | 896/18.08.1997 | 1535/11-12-2014 | |
| 8. | HC Nabi Ullah No.843 | 10.07.1991 | 285/04.03.1998 | 1535/11-12-2014 | |
| 9. | HC Qajeer Zada No. 705 | 27.06.1989 | 287/04.03.1998 | 1535/11-12-2014 | |
| 10. | HC Jamdad Khan No.583 | 01.07.1990 | 287/04.03.1998 | 1535/11-12-2014 | |
| 11. | HC Saleh Muhammad No.763 | 29.12.1994 | 1387/17.10.1998 | 1925/23.11.2017 | |
| 12. | HC Amir Zaman No.505 | 01.07.1990 | 1388/17.10.1998 | 1925/23.11.2017 | |
| 13. | HC Azmat Khan No.543 | 22.03.1986 | 1397/17.10.1998 | 62/01.01.2019 | |
| 14. | HC Murad Ali No.827 | 10.07.1991 | 122/28.01.2000 | 372/04.05.2020 | |
| 15. | HC Talwar Ali Shah No.969 | 12.08.1991 | 122/28.01.2000 | 168/11.02.2021 | |
| 16. | HC Faiz Muhammad No.600 | 01.07.1990 | 189/19.03.2002 | 168/11.02.2021 | |
| 17. | HC Fajid Ur Rahman No.87 | 01.12.1991 | 189/19.03.2002 | 196/22.02.2021 | |
| 18. | HC Iqtidar No.603 | 01.09.1990 | 191/20.03.2002 | 1323/31.12.2021 | |
| 19. | HC Fazli Ameen No.152 | 14.12.1996 | 656/08.07.2002 | 1323/31.12.2021 | |
| 20. | HC Noor Ul Wahab No.970 | 01.12.1991 | 966/19.09.2002 | 1323/31.12.2021 | |

| | | | | |
|-----|----------------------------|------------|------------|-----------------|
| 44. | FC Inwan No.1056 | 28.09.1995 | 31-01-1971 | 1279/06.10.2007 |
| 45. | FC Saleem Javid No.541 | 17.07.1991 | 15-02-1969 | 1280/06.10.2007 |
| 46. | FC Idrees Khan No.658 | 03.07.1996 | 25-02-1977 | 376/12.04.2008 |
| 47. | FC Amjid Ali No.567 | 01.07.1990 | 15-05-1972 | 470/10.05.2008 |
| 48. | FC Farhad Ali No.1005 | 05.07.1993 | 06-03-1968 | 524/13.05.2008 |
| 49. | FC Shah Hassan No.296 | 09.07.1998 | 26-09-1978 | 524/13.05.2008 |
| 50. | FC Said Ali Shah No.502 | 01.04.1999 | 13-02-1979 | 954/23.07.2008 |
| 51. | FC Ijaz Ul Haq No.604 | 01.07.1990 | 05.03.1972 | 957/24.07.2008 |
| 52. | FC Muhsin Raza No.472 | 28.08.1995 | 20-05-1976 | 1758/18.12.2008 |
| 53. | FC Liaqat Ali No.958 | 10.10.1990 | 01-04-1971 | 1762/18.12.2008 |
| 54. | FC Fazal Mohammad No.1277 | 05.07.1993 | 03.01.1974 | 143/21.01.2009 |
| 55. | FC Nasir Khan No.1016 | 26.05.1999 | 10-01-1975 | 679/11.04.2009 |
| 56. | FC Shujat No.806 | 06.07.1998 | 05-05-1977 | 950/30.05.2009 |
| 57. | FC Arshid Ali No.1112 | 31.01.2002 | 22-07-1981 | 957/02.06.2009 |
| 58. | FC Ghaffar Ali No.433 | 15.01.1995 | 03-04-1969 | 1300/24.06.2009 |
| 59. | FC Wazir Jamal No.517 | 01.07.1990 | 12-05-1970 | 1301/24.06.2009 |
| 60. | FC Mohammad Javid No.169 | 08.07.1998 | 02-06-1974 | 1313/25.06.2009 |
| 61. | FC Islam Shah No.461 | 08.07.1998 | 28-07-1978 | 1315/25.06.2009 |
| 62. | FC Dost Mohammad No.799 | 08.07.1998 | 01-09-1977 | 1319/25.06.2009 |
| 63. | FC Zafrullah No.443 | 11.12.1990 | 02-06-1970 | 1323/25.06.2009 |
| 64. | FC Javid No.724 | 15.02.1996 | 09-04-1975 | 1323/25.06.2009 |
| 65. | FC Imran Khan No.159 | 09.07.1998 | 15-04-1980 | 1323/25.06.2009 |
| 66. | FC Shah Room No.246 | 11.11.1999 | 02-11-1977 | 1323/25.06.2009 |
| 67. | FC Hayat Khan No.883 | 23.09.1987 | 23-09-1967 | 359/31.03.2010 |
| 68. | FC Jawaz Khan No.696 | 20.03.1988 | 25-06-1967 | 491/13.05.2010 |
| 69. | FC Jahanzeb No.194 | 28.09.1995 | 12-02-1973 | 1048/24.09.2010 |
| 70. | FC Muhammad Kalam No.1310 | 25.05.2008 | 12-12-1986 | 41/06.01.2011 |
| 71. | FC Fazle Rehman No.1193 | 26.07.2007 | 03-03-1980 | 44/06.01.2011 |
| 72. | FC Mustahab Gul No. 1060 | 31.01.2002 | 13-01-1981 | 56/06.01.2011 |
| 73. | FC Ishfaq No.1257 | 26.07.2007 | 05-05-1987 | 76/10.01.2011 |
| 74. | FC Mukhtaj Ud Din No.460 | 01.07.1990 | 04-12-1970 | 393/16.03.2011 |
| 75. | FC Dawood Ur Rehman No.254 | 09.07.1998 | 15-11-1979 | 447/29.03.2011 |
| 76. | FC Adnan Khan No.610 | 07.08.1999 | 15-03-1981 | 669/16.05.2011 |
| 77. | FC Shakeel No.700 | 29.05.2007 | 10-02-1985 | 1040/21.07.2011 |
| 78. | FC Abdul Wajid No.589 | 22.07.1998 | 12-10-1975 | 1121/09.08.2011 |
| 79. | FC Niaz Ali No.137 | 13.07.1994 | 01-01-1970 | 1298/13.09.2011 |
| 80. | FC Sikandar Khan No.835 | 10.07.1991 | 16-01-1971 | 1369/23.09.2011 |
| 81. | FC Bahar Ali No.630 | 04.05.2006 | 21-04-1980 | 1431/03.09.2011 |
| 82. | FC Waheed Khan No.1142 | 22.07.1998 | 08-02-1974 | 1554/26.10.2011 |
| 83. | FC Jan Raz No.1069 | 31.01.2002 | 10-03-1980 | 1555/26.10.2011 |
| 84. | FC Anwar Mehmood NO.1304 | 01.08.2008 | 01-03-1985 | 1555/26.10.2011 |
| 85. | FC Amjid Khan No.294 | 01.04.1992 | 07-06-1972 | 1717/26.11.2011 |
| 86. | FC Mohammad Saleem No.492 | 01.07.1990 | 01-01-1969 | 1857/19.12.2011 |
| 87. | FC Manzoor Ullah No 624 | 09.07.1998 | 16-03-1975 | 1857/19.12.2011 |
| 88. | FC Arshid No.175 | 17.09.1999 | 31-12-1977 | 1857/19.12.2011 |
| 89. | FC Mohammad Shafiq No.168 | 11.12.1990 | 03-02-1969 | 1900/27.12.2011 |
| 90. | FC Waheed No.621 | 31.01.2002 | 03.03.1982 | 27/05.01.2012 |
| 91. | FC Misbah Ullah No.990 | 01.09.1992 | 13-03-1974 | 210/16.02.2012 |
| 92. | FC Sher Hassan No.1036 | 08.01.1995 | 24-03-1974 | 210/16.02.2012 |