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 21.06.2023before the D.B. P.P given to the parties.

(Fareena Raul) Member (E)

(Kalim Arshad Khan) Chairman

Fazle Subhan P.S

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.

(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.

(Mian Muhammad)

Member (E)

(Salah-ud-Din)

Member (J)

TOWN TOWN

Proper DB is not available, therefore, the case is 2 & 11.2021 adjourned to 1/3/22 for the same before

Due to retirement of the Hon ble Chairment the Case is adjourned to come up for the Same as before on 18-6-22 1-3-22 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 haliday the case is adjourned to 22-11-2022

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

Chairman

Form- A

FORM OF ORDER SHEET

Court of			
	5739		
Case No	5,01	/2021	

	Case No	/2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/06/2021	The appeal of Mr. Badshah Khan resubmitted today by Mr. Asadulla Khan Yousafzai Advocate may be entered in the Institution Register and pu
8(ANNED	up to the Worthy Chairman for proper order please.
Pe	Suawar	REGISTRAR
2-	03/06/21	This case is entrusted to S. Bench for preliminary hearing to be putup there on $9/9/21$
		CHAIRMAN
	•	
•		
. • • • •		
	-	

The appeal of Mr. Badshah Khan No. 717/LHC C-II Police Line 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. 756 /ST,
Dt. 03/05/2021

REGISTRAR, SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Asad Ullah Khan Yousafzai, Advocate Peshawar.

Pf Sin,

Res-submitted after due completion.

the spare copies along with the espectation to complete to days.

BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL PESHAWAR

5739 Service Appeal No._____/2021

Badshah Khan

VERSUS

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 Promotion order dated 19:05.2010	"A"	6
	Copy of commendation certificates	"B"	7-18
4	Copy of reversion order	"C"	19
5	Copy of impugned order	"D"	20-21
6	Copy of departmental appeal	"E"	33
7	Copy of impugned order	"F"	23-24
8	Wakalat Nama		

Appellant

Through

Asad Uallah Khan Yousafazai 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.	i,u	
Badsha Khan No.717/LHC-C-II	, * 	
Police Line Nowshera	А	ppellant

VERSUS

- 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

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 avoid 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 respondent 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 01.12.1988. He was then promoted to Head Constable BS-7 on 14.05.2010 as special case, on account of his dedication devotion and outstanding performance. The appellant was also awarded 19 "Commendation Certificates" regarding his exceptional performance. He had 32/33 years long unblemished service record.
 - (Copies of the promotion order and commendation certificates are appended as Annexure-"A" & "B)
 - 2. That the appellant has performing his duty with great zeal, zest and devotion. But astonishingly he was reverted from C-II Head Constable to constable vide order dated 02.12.2014 passed by the then DPO Mardan.
 (Copy of reversion order is attached as Annexure-"C")

- 3. That though the appellant was promoted on the bases of outstanding performance but he was also Senior and fit but even then his reversion order was made after four long years apart from this the salary and benefits which the appellant received during promotion period was also withdrawn from him.
 - 4. That the appellant then continued his service with zeal, enthusiasm and honesty but the respondent No.1 to 5 once again ignore 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 all asked as annerum "D")
 - 5. 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. (Copy of departmental appearance order are alleged as an arranged from the impuned order are alleged as an arranged from the impuned order are alleged as an arranged.
 - 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;

GROUNDS;

- **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 01.12.1988 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 senior 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 injections 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 appearent 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 P-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 ordersa 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/filling 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 Amortin By (b)

ORDER

Due to the exemplary performance of the Masalihattee committees of Nowshera district, the worthy Provincial Police, K.P.K. Peshawar during distribution of commendation certificate amongst the coordinators and deputy coordinators of Masalihattee committees on (1.4.2017) has also appreciated the coordination of the local Police of district Nowshera. His good honour has also directed for suitable award for concerned dealing hands

Posted as Mobarrir Musalihattee committee is hereby promoted to the rank of Call Head constable BPS-7 as a special case with immediate effect

7 OB No. 495 Doted 19 . 5 . 2010.

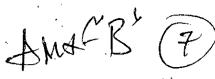
No. G 2235 PA, dated Novembera, the 17-5.

Copy for information and necessary action to the:-

- 1. Pay Officer.
- 2. E.Č.
- 3. O.H.C.
- 4. F.M.C.

ATC.

CERTIFICATE



. is ce.....ed that Head Constable Bacha Khan No-

717 (S/O Akram Khan R/O Village Chiragh Din Kili, Tehsil Takht Tehsil Takht Bahai, District Mardan) is serving in Police Department District Nowshera. He is an efficient and dutiful official. And has a good prestige in the society. He has been performing his duties upto the entire satisfaction of his superiors. There is no complaint received him during his long service (25 years). Further more he has good attitude manner with both the Police and Subjic. His performance always remained satisfactory.

OB No. 2/07.

Dated 13/12/013.

Nowshera



TO WHOM MY CONCERN

It is a matter of immense pleasure to introduce Mr. Badshah Khan Naib court (NC). He is well known to me form over two years. He is a man of sagacity, enthusiastic, outstanding repute and person of strong mind. As far his duty at district and session court is concerned, he is a punctual, hard working, sincere, dutiful, honest, and man of having good reputation.

He was transferred to district and sessions courts on 12.11.2004. as Naib court (NC). Till now he is under my direct supervision. He is strong and quick mind person. In a very recent case FIR No. 983/6 under section 302/13 AO/7ATA police station Nowshera, he arrested woman in the premises of court with loaded deadly weapon very bravely and give in custody of sick.

Mr. Badshah Khan (NC) also show me some other certificates which are rewarded to him by DPO,s of different police stations which certified his braveness on different occasions. During his posting at P.S AKora Khattak he jumped form the bridge of Attock for saving life of women who tried fro suicide (Copies of all the certificates are attached with).

During all this period since he joined district and session courts till now as Naib court, he has done his duty sincerely. Apart form this he always successfully completed his tasks with full devotion, strong determination and great sense of responsibility. He is punctual, hard working committed and very good moral character,

I have always found him bold and hardworking during his duties.

Keeping in view all the above facts. Mr Badshah Khan (NC), is recommended for promotion on the post of C2 Hawaldar.

I pray and wish him all the success in life and my benediction is with him.

District and session judge,
Nowshera





TO WHOM IT MAY CONCERN.

Mr. Badshah Khan Naib Court (NC) is working as Naib Court in the court of Hon'ble District & Sessions Judge, Nowshera since 12.11.2004. He is honest, hard worker and courageous police official. Recently he has overpowered a women with loaded weapon in the Court premises and handed her over to the local police of police station Nowshera Cantt. The said Naib Court has also overpowered proclaimed offender Javed Akhtar required in case vide FIR No. 118 dated 11.02.2002 under section 302/34 PPC of police station Nowshera Canthanded him over to the concerned police. Moreover, he has also arrested proclaimed offenderNasar Ali required in case vide FIR No. 243 dated 07.04.2008 under section 17 (3) Haraabah/411 PPC of Police Station Pahari Pura Peshawar and handed him over to the local police concerned. Similarly the said Naib Court has also arrested the accused namely Arjun Das and recovered with him 140 bottles of liquor and handed him over to the local police vide FIR No. 87 dated 27.01.2009 under section 3/4 PO of police station Nowshera Cantt: He has been awarded commendation certificates and cash rewards by different Worthy Superintendents Police Nowshera, which are enclosed herewith.

In view of the above Good performance of Naib Court Badshah Khan, he is recommended for confirmation on the post of Hawaldar as well as cash reward.

I pray and wish him all the success in life and my benediction je with him.

Dried 108-4-05

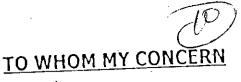
Send in original to the DPO, Nowshera for kind perusal

and strongly recommended to confirm/promote the said

Naib Court of this Court.

08-4-09

District Public Prosecuto



Mr. Badshah Khan Naib court, (NC) is working as Naib court in the court of Hon,ble district & session judge. Nowshera since 12.11.2004 He is honest, hard worker and sick police official. Recently he has over powered a women with leaded weapon in the court premises and handed her over to the local police of police station Nowshera Cantt: the said Naib court has also overpowered proclaimed offender Javed Akhtar required in case vide FIR No. 118 dated: 11.02.2002. Under section 302/34 PPC of police station Nowshera Cantt: and handed him over to the concerned police. Moreover, he has also arrested proclaimed offender Nasar Ali required in case vide FIR NO. 243 dated: 07.04.2008 under section 17(30 Haraabah / 411 PPC of police station Pahari Pura Peshawar and handed him over to the local police concerned. Similarly he recovered 140 bottles of liquor form accused handed over him to the local police vide FIR No. 87 dated: 27.01.2009 under section 3/4 PO of police station Nowshera Cantt: he is over powered on accused woman in the court premises after she shot and injured another female. He arrested the accused instantly red handed alongwith the weapon of offence. The case FIR No. 432 police station Nowshera Cantt U/s 324/34/13 Ao. He has been awarded commendation certificate and cash awards by different worthy superintendents police Nowshera, which are enclosed herewith.

In sick good performance of Naib court Badshah Khan he is recommended for confirmation on the post of Hawaldar as well as cash award.

I pray and with him all the success in life and my benediction is with him.

Sir forwarded and stirringly Recommended

> District and session judge, Nowshera

No. 1619 / Dated: 22.07.2009.

Send in original to the DPO, Nowshera for kind perusal and strongly recommended to confirm / promoted the said Naib court Mr. Badshah Khan of this court.

Ikram Ullah Khan District & session judge Nowshera



TO WHOM MY CONCERN

It is a matter of immense pleasure to introduce Mr. Badshah Khan Naib court (NC). He is well known to me form over two years. He is a man of sagacity, enthusiastic, outstanding repute and person of strong mind. As far his duty at district and session court is concerned, he is a punctual, hard working, sincere, dutiful, honest, and man of having good reputation.

He was transferred to district and sessions courts on 12.11.2004. as Naib court (NC). Till now he is under my direct supervision. He is strong and quick mind person. In a very recent case FIR No. 983/6 under section 302/13 AO/7ATA police station Nowshera, he arrested woman in the premises of court with loaded deadly weapon very bravely and give in custody of police.

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I have always found him bold and hardworking during his duties.

Keeping in view all the above facts. Mr Badshah Khan (NC), is recommended for promotion on the post of C2 Hawaldar.

I pray and wish him all the success in life and my benediction is with him.

District and session judge, Nowshera





N.-W. F. P. POLICE

COMMENDATION CERTIFICATE

Granted to————————————————————————————————————	Resident of		- <u> </u>
Akora.	-Police Station	Howshell	™ — D
in recognition of	good work i.e. feiled w	nvatbemp	t of suicide.
Unic. 3/4. 12.45 }	gs.2007-		Superintendent 6

If a Police Officer rank and number in final. Cash reward, if any to be specified.







COMMENDATION CERTIFICATE III

· · · · · · · · · · · · · · · · · · ·	JO191191-1-	
	HC Badshah	Takht Bhai
Granted to	Resident of Charanh Din Kallay	ing certain disputes of public in the
Son of Akram Khan	his dynamic performance in reserving	<u></u>
District Mardan	in recognition =in recognition =	
Musalihattee Committees Bistri	<u>ot Novement</u>	
Cash Reward of Rs: 2000/-	ATC	
OB No1245		
Dated05/10/2012		MULLAMAN
		(MUHAMMAD HUSSAMIKHAN) District Police Officer,
		Nowshera
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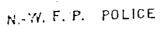
COMMENDATION CERTIFICATE-IN

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	•	HC Badshat han N	o. 7 17		<u> </u>
Granted to _			Charagh Din Kallav	_ Police Station	Takht Bhai
Son of	Akram Khan	Resident of	Criaragh Din Kake	ittoo District	Nowshera and awarded
	Mardan	_ in recognition of Good pe	<u>rformance of Masalihatte</u>	e Committee District	<u>(TOTISTICIES</u>
District	-		· · · · · · · · · · · · · · · · · · ·		;
CC-III with ca	sh reward Rs: 1000/				,
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Dated 17	/ 05 / 2010.				July VI
Dated				D:-6-;	cr Police Officer,
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Fort: No. 15-3 (9)









COMMENDATION CERTIFICATE

C	Constable Bacha Khan Mc. 77 . (georpion Course) .	
Granted o-		\/:11 = = 0
Son of	//E219 CHE OI	Village
		District
• • • • • • • • • • • • • • • • • • • •	Good shooting in Scorpion Coudse, and	<u>ng</u> 20.1.96.
in recognition	J(1 O(
Date	Old-III with cash reward of	
O.B. No	Rs 200/- Superintende	ant of Police. Insurancement

Note: (1) If a Police Officer rank and number in final.
(2) Cash reward, if any to be specified.







N. W. F. P. POLICE

OMMENDATION CERTIFICATE

Granted to Polisiastan Then 32.8717	and the second of the second o
Son of Resident of	Village
Nowabery Cantto Police Station Nowahe	District
in recognition of Dass RTB No. 151 dt. 31-3-1939	U/n 302 PS/Mousbers Cartin
Date15-4-1929 } O.B. No431	(MAJID MA) MATE Superintendent of Police.

Note: (1) If a Police Officer rank and number in final.
(2) Cash reward, it any to be specified.

Bowshare

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CERTIFICATE OF PARTICIPATION

Tae UN Fairly sa Age in

It is crified that

Mr. SHOSHAR KHAN

has participated in

One Day Police Sensitization Vorkshop

Con "Thin an Rights & Stress Management"

Held at Police I ve Neuxbehraon Sett. 30. 2011

Organized by SACH-Struggle for Change Supported by UNHCR

Khalicle Salim

Khalida Salimi Executive Director SACH-Struggle for Change A party

UNITOR Representative



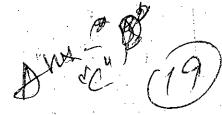
Recognition Contificate Recognition Certificate

BADGHAH MYAN NO. 717 CF NOWSHERA DISTRICT

This certificate is awarded for voluntary work and support for the promotion of Human Rights

Habib Malik Orakzai

ORDER



Consequent upon the recommendation of the committee vide this office Memo No.10046/EC, dated 22-09-2014, duly approved by Region Chief vide his office Memo No.7790/ES, dated 28-11-2014 the following 09 C-II Head Constables are hereby reverted to their substantive ranks (Constable) with immediate effect:-

- 1. Gulistan No 1017
- 2. Fazal Habib No. 789
- 3. Badshah Khan No.717
- 4. Nawab Ali No.834
- 5. Muhammad Javed No.169
- 6. Said Ali Shah No.502
- 7. Asfandyar No.925
- 8. Jamshid No 733
- 9. Qamar Zia No.1170

OB.No_	1498	
Dated	>-/2-	074.

District Police Officer, Newshera.

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 13103-7 /EC dated Nowshera 33/12/ /2014.

Copy of above is forwarded for information to the:-

- 1. Deputy Inspector General of Police Mardan Region-I Mardan w/r quoted above.
- 2. SP, Investigation Nowshera.
- 3. Pay Officer.
- 4. OHC/FMC.

A L

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 understanded duly approved by the Worthy Deputy Inspector General of Police, Mandam 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 trend Constable to BPS-09 (11770-730-33670) against the existing vacancies of the Head Constable with immediate effect:-

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

és № <u>168</u> Dated<u> // / a ⊋ / 2021</u>

> District Police Officer, Nowshera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 1512-15 /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.

P

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 tability 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

8-01-2021. 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:

8-01-2021. The cases of the following 07 (C-II) constables according to:	DECISION TAKEN
S# NAME & NO.		
3# 		Promoted
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		Will be promoted subject to the availability of vacancy
E 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. Igtidar Ahmad No.603	-	Will DO STATES
/. Iqtidar Arimad No.003		

(NOOR JAN SP Inv: Nowshera (MEMBER)

(SAIF ALI KHAN) **DSP HQrs Nowshera** (MEMBER)

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

المسلاحات برادصول دانسان تریابی مردان ریجن مردان درخواست بمرادصول دانسان تر تیابی بیژگنشیبل

جناب عالى!

عمر بھر دعا گور مینگے ۔

تر 24.02.2021 تر الم

آپاتا بع فرمان بادشاه خان نمبر 717/LHC-C-II متعینه پولیس لائن نوشهره

وسخط: <u>مسلمان</u> موبائل نمبر:0346-5647730

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. 1587

/ES, dated Mardan Region, the

24-103/2021.

Subject:

APPLICATIONS.

Memo:

こと、このでは、日本のは、日本のでは、これでは、これでは、これでは、日本のでは、日本

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.

ATC



OFFICE OF THE DISTRICT POLICE OFFICER

NOWSHERA

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

To:

The Deputy Inspector General of Police, Mardan Region-I, Mardan.

No. 2324 /EC, dated Nowshera the 16.03/2021.

Subject:

APPLICATIONS

Memo:

Kindly refer to your office Endst: No. 1177/ES, dated 01-03-

2021.

It is submitted that comments on the applications of applicant FC Badshah Khan No. 717 and FC Hayat Khan No. 883 of this District are as under:

That applicant Badshah Khan No. 717 had been promoted to the rank of Head Constable in the year 2010, however, he was reverted back to his substantive rank i.e constable vide OB No. 1498, dated 02-12-2014, on the recommendation of the committee constituted for the purpose, for the reason that applicant alongwith others had been granted out of turn promotion. Similarly, list of C-II constables was revised/prepared wherein names of C-II constables were placed according to placement of their names on C-II list.

Feeling aggrieved, applicant moved departmental appeal before the appellate authority i.e Deputy Inspector General of Police, Mardan, however, his appeal was filed vide order No. 8545-46/ES, dated 29-12-2014. The same order was challenged by the applicant before the Khyber Pakhtunkhwa, Service Tribunal, Peshawar through service appeal No. 45/2015. The Honourable Tribunal dismissed appeal of the applicant vide order dated 17-05-2016. Applicant then approached Supreme Court of Pakistan for grant of CPLA through C.P No. 404-P/2016, but the august court also dismissed the same and refused to grant leave.

It is worth to mention here that applicant is at serial No. 39 in seniority list of C-II Constable and he will be considered for promotion on his own turn.

Police Department



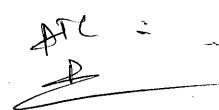
LIST OF C-II CONSTABLES

S.No	Name & No	D/O	Date of	Remarks
		Enlistment	promotion List	
	·		C-II with OB No	
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	1. 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
i.v.	FC Elkandar 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	01.07.1090	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 Falwar Ali Shah No.969	12.08.1991	122/28.01.2000	
(1)	FC Raj Bahader No.128	22.03.1986	125/28.01.2000	
32.	FC Mohammad Ajmal	19.12.1990	158/01.02.2000	
	No.286		#	

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<u></u>		- 2 -		1
-		20.09.1990	160/01.02.2000	
33. T	in Tanaai Aimaa issa - <u>1</u>	24.03.1986	189/19.03.2002	O despitation ACF
24	Et awat Ur Rehman No.37	12.12.1988	189/19.03.2002	On deputation ACE
າ ເ	GC Iffikhar Khan No. 700	01.07.1990	189/19.03.2002	
28	FC Faiz Mohammad No.600	26 12 1000	189/19.03.2002	
37.	FC Mohammad Tariq	26.12.1990		
1.	No 665	01.12.1001	189/19.03.2002	OTD.
20:	EC Fajid Ur Rehman No.87	01.12.1991 18.07.1925	189/19.03.2002	On deputation CTD
20	EC Iltaf Hussain No.198	01.09.1990	191/20.03.2002	
40.	FC Intidar Ahmad No.603	101.09.1990	656/08.07.2002	
41.	FC Fazle Amin No.152	05 11 1975	771/06.08.2002	
42.	FC Mohammad Iqbal	05.11.1975		
→ ∠.	No 1050	11.06.1092	952/17.09.2002	
43.	EC Jahanzeh No.425	11.06.1983	966/19.09.2002	
44.	EC Noor Ul Wahab No.970	01.12.1991	1110/05.11.2002	On deputation ACE
45.	FC Zar Badshah No.6/3	20.06.1988	1273/23.12.2002	
45.	FC Zelam Khan No.770	08.12.1988	99/28.01.2003	
40: 47	FC Mohammad Ayaz	24.01.1980		
4/	No.422	101071000	139/04.02.2003	On deputation Traffic
48.		01.07.1990		Peshawar
. 46.		16.10.1991	156/10.02.2003	
49.	FC Aurangzeb No.832	13.03.1991	214/01.03.2003	
50.	FC Naeem Ullah No.99	17.03.1990	215/01.03.2003	
51	FC Zar Ali No.794	10.07.1991	290/18.03.2003	
52	2. FC Masroof Ali Shah	10.07.1971		
	No 894	2705 1989	373/10.04.2003	
. 53	3. FC Mohammad Faraz	27.05.1989		
J.	No 659	01.07.1990	409/15.04.2003	
54	4 FC Imrad Ali No.549	01.07.1990	415/15.04.2003	
55	5 FC Ibrahim No.516	01.07.1990	450/22.04.2003	
	6 FC Ian Wali No.575	01.07.1990	450/22.04.2003	
	7 FC Mujahid Shah No.508	17.07.1000	554/08.05.2003	
	R FC Farzand Ali No.748	17.07.1988	563/14.05.2003	
	G FC Johar Ali No. 400	15.04.1985	581/17.05.2003	
	o FC Abdul Wali No.519	01.07.1990	582/17.05.2003	b - inl heaps
	61 FC Khilawat Shah No.807	01.07.1990	616/25.05.2003	On deputation special
	62 FC Sajjad Akhtar No.903	[11.04.12/1	639/30.05.2003	3
	63 FC Abdul Rauf No.314	17.01.1981	666/05.06.2003	3
	64 EC Riaz Ahmad No.26/	19.03.1987	667/05.06.2003	3
1	65 FC Mohammad Shah No.	867 08.12.1988	667/05.06.2003	3
<u></u>	66 FC Aurangzeb No.980	12.00.1971		3
<u> </u>	67 FC Zahid Gul No.485	31.07.1990		3
<u> </u>	67. FC Zahid Gui No.485 68. FC Shaukat Ali No.949	03.07.1991	100/20.00.20	
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69	FC Mohammad Ayaz	08.09.1982	803/01.07.2003	
0,	No.228		·	
70.	FC Jahangir Khan No.111	28.03.1993	869/12.07.2003	5
71.	FC Ajmal Khan No.666	01.07.1989	895/18.07.2003	3
72.	FC Shamshad Ali No.527	13.08.1991	895/18.07.2003	5
73.	FC Fazle Akbar No.738	08.12.1988	896/18.07.2003	دنيا شرو
74.	FC Ayaz Ali No.994	01.10.1992	896/18.07.2003	2
75.	FC Rasheed Ul Haq No.36	30.07.1991	899/18.07.2003	7
76.	FC Noor Shed No. 302	28.09.1983	921/19.07.2003	ر ما درو
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	25.06.1986	921/19.07.2003	"
	No.511			A
80.	FC Jamal Shah No.410	28.06.1986	921/19.07.2003	19
81.	FC Fazil Khan No.545	30.10.1988	921/19.07.2003	7
82.	FC Sher Bahader No.445	25.09.1990	988/18.03.2003	JUNION
83.	FC Shoukat Hayat No.680	08.12.1988	648/29.07.2004	ريا ذكر في
84.	FC Mukhtyar Nabi No.397	01.07.1990	688/12.08.2004	On deputation Traffic
				Peshawar 5
85.	FC Sharif Gul No.856	10.07.1991	824/12.10.2004	2
86.	FC Saeed Ullah No.635	02.12.1996	835/14.10.2004	\$
87.	FC Ishfaq No.947	24.08.2000	835/14.10.2004	Bottom FRP Peshawar 3
88.	FC Sardar Ali No.943	24.09.1996	757/11.09.1999	Bottom FRF Feshawai
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	2
91.	FC Javid No.786	29.04.1992	975/19.12.2004	3
92.	FC Mohammad Tahir	22.08.1982	15/05.01.2005	ويتراسرد
l 	No.307	10.05.1001	15/05 01 2005	3.
93.	FC Zameer Gul No.853	10.07.1991	15/05.01.2005	On deputation
94.	FC Fazal Ghani No.767	08.12.1988	19/07.01.2005	NHA/Motorway
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	7
97.		18.10.1995	125/17.02.2005	7
98.		12.08.1991	1153/24.08.2002	Bottom charssada 4
99.		01.07.1990	428/14.06.2005	4
	. FC Khurshid No.638	20.09,1988	918/02.06.1997	Bottom Mardan 🥠
	FC Ziladar No.29	29.12.1994	546/11.07.2005	On deputation Special Branch ?
	FC Farid Khan No.1000	12.08.1991	624/15.08.2005	5 //
	. FC Azeem Dad No.687	29.06.1989	695/12.09.2005	5
	FC Jan Ali No.813	20.09.1989	335/21.04.2006	"
<u> </u>	FC Aurangzeb No.764	08.12.1988	485/05.06.2006	د چارگر د
	. FC Naseer Mohammad	10.07.1991	523/15.06.2006	5.
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107	FC Abdul Awal No.27	26.06.1996	524/15.06.2006	
	FC Naveed Ullah No.1046	01.12.1996	532/17.06.2006	
	FC Dil Mohammad No. 1033	17 1993	534/17.06.2006	
	FC Zakir Khan No.793	06.07.1998	780/07.09.2006	
	FC Sadiq Ahmad No.557	01.07.1990	894/07.10.2006	
	FC Riaz Khan No.824	10.07.1991	1095/23.12.2006	
	FC Bacha Khan No.717	08.12.1988	104/01.02.2007	
	FC Meher Rehman No.1135	26.06.1996	139/08.02.2007	Bottom seniority
	FC Amjid Ghafar No.39	01.07.1985	188/24.02.2007	
	FC Amin Khan No.251	20.11.1991	1212/05.10.2007	
	FC Waheed Ullah No.431	01.12.1986	1226/05.10.2007	
	FC Waris Khan No.336	27.09.1988	1235/06.10.2007	
	FC Parveez Gul No.956	01.09.1992	1235/06.10.2007	
	FC Riaz Gul No.735	30.03.1994	1239/06.10.2007	
	FC Aziz Ur Rehman	07.07.1994	1239/06.10.2007	
121.	No.1051	07.07.1551		
122	FC Sher Alam No. 1054	08.01.1995	1239/06.10.2007	
	FC Mohammad Tahir	J: 07.1990	1243/06.10.2007	
125.	No.527	l statist	12.5,03.15.25	
124.		01.09.1992	1245/06.10.2007	
	FC Maqbali Khan No. 671	26.12.1990	1253/06.10.2007	
	FC Najme Alam No.975	18.08.1991	1255/06.10.2007	
	FC Munsif Khan No.983	10.07.1991	1261/06.10.2007	
	FC Mohammad Tahir	07.07.1994	1265/06.10.2007	
120	No.1043	0,10,1122		
120	FC Mohammad Sajid No.916	02.08.1991	1266/06.10.2007	
	FC Fazal Habib No.789	07.12.1991	1270/06.10.2007	
	FC Lal Mohammad No.847	10.07.1991	1276/06.10.2007	
	FC Imtiaz No.721	24.08.1989	1277/06.10.2007	On deputation Anti Corruption
	FC Inwan No.1056	28.09.1995	1279/06.10.2007	
	FC Saleem Javid No.541	17.07.1991	1280/06.10.2007	-
	FC Zahir Rasool No.625	01.12.1991	1281/06.10.2007	
l	FC Abdul Bagi No.1118	15.10.1991	1284/06.10.2007	
	FC Ittikhar Hussan No.	990	1286/06.10.2007	
138	FC Nawab Ali No.834	09.07.1991	1286/06.10.2007	
130	FC Idrees Khan No.658	03.07.1996	376/12.04.2008	
	FC Amjid Ali No.567	01.07.1990	470/10.05.2008	
L	FC Tashqand No.568	01.09.1990	524/13.05.2008	
{	FC Farhad Ali No.1005	05.07.1993	524/13.05.2008	
L	FC Shah Hassan No.296	09.07.1998	524/13.05.2008	
·	FC Mohammad Ayub	18.12.1994	803/26.06.2008	
] 144	No.339	10.12.1777	005/20.00.2000	
1'45	FC Ghulam Murtaza No.340	01.07.1990	926/19.07.2008	
143	. TO Gildain Wurtaza 110.340	101.07.1770	, , , , , , , , , , , , , , , , , , , ,	

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957/24.07.2008	
1130/22.08.2008	
1495/29.10.2008	
1753/18.12.2008	
1758/18.12.2008	
1758/18.12.2008	
1760/18.12.2008	
1761/18.12.2008	
1762/18.12.2008	
143/21.01.2009	
679/11.04.2009	
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679/11.04.2009	
950/30.05.2009	
957/02.06.2009	
1285/24.06.2009	
1293/24.06.2009	
1300/24.06.2009	
1301/24.06.2009	
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1315/25.06.2009	
1318/25.06.2009	
1319/25.06.2009	
1319/25.06.2009	
1319/25.06.2009	
1319/25.06.2009	77.00

70				
146	FC Said Ali Shah No 502	07.04 1999	954/23.07.2008	
	FC Ijaz Ul Haq No.604	01.07.1990	957/24.07.2008	
	FC Parveez Akhtar No.667	12.11.1990	1130/22.08.2008	
	. FC Farhad Ali No.1160	09.10.1994	1495/29.10.2008	
	FC Imtiaz Ali No.165	04.06.1991	1753/18.12.2008	
	. FC Nawsher Zaman No.316	24.06.1986	1758/18.12.2008	
	FC Hawaldar No.472	28.08.1995	1758/18.12.2008	
	FC Yar Mohammad No.605	01.07.1990	1760/18.12.2008	
	FC Abdul Rasheed No.612	22.03.1986	1761/18.12.2008	
	FC Liaqat Ali No.958	10.10.1990	1762/18.12.2008	
156		05.07.1993	143/21.01.2009	
	No.1277			
157		06.07.1994	679/11.04.2009	
	No.1042			
158	B. 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	D. FC Arshid Ali No.1112	31.01.2002	957/02.06.2009	
	1. FC Irshad Ali No.919	01.01.1990	1285/24.06.2009	
	2. FC Sher Zada No.1007	27.10.1992	1293/24.06.2009	
	3. FC Ghaffar Ali No.433	15.01.1995	1300/24.06.2009	
	4. FC Wazir Jamal No.517	01.07.1990	1301/24.06.2009	
16	5. FC Shamshad Ali No.838	10.07.1991	1311/24.06.2009	
16	6. FC Amjid Ali No.586	01.07.1990	1312/25.06.2009	
16	7. FC Mohammad Javid	08.07.1998	1313/25.06.2009	
,	No.169			
16	8. FC Riaz Mohammad NO.624		1314/25.06.2009	
16	9. FC Sher Ali No.614	09.12.1990	1315/25.06.2009	*
17	0. FC Islam Shah No.461	08.07.1998	1315/25.06.2009	~
	1. FC Farhad Ali No.219	13.12.1990	1318/25.06.2009	
. 17	2. FC Liaqat Ali No.817	02.07.1982	1319/25.06.2009	
. 17		20.10.1990	1319/25.06.2009	
	4. FC Mushtaq Ahmad No.917	12.08.1991	1319/25.06.2009	
17	5. FC Qaisar Zaman No.581	20.08.1991	1319/25.06.2009	O l dia T - CC -
17	6. FC Abdul Rasheed No.972	15.03.1995	1319/25.06.2009	On deputation Traffic Peshawar
17	7. FC Dost Mohammad No.771	08.07.1998	1319/25.06.2009	
	8. FC Jami Ud Din No.513	01.07.1990	1323/25.06.2009	
	9. FC Kifayat Shah No.355	18.11.1990	1323/25.06.2009	
	30. FC Zafrullah No.443	11.12.1990	1323/25.06.2009	
	31. FC Taimous No.859	10.07.1991	1323/25.06.2009	
	32. FC Juvid No.724	15.02.1996	1323/25.06.2009	
	3. FC Imran Khan No.159	09.07.1998	1323/25.06.2009	
	34. FC Shah Room No.246	11.11.1999	1323/25.06.2009	

	6-		
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	09.07.1998	447/29.03.2011	
No.254			
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 Mchmood	01.08.2008	1555/26.10.2011	
NO.1304			
207. FC Amjid Khan No.294	01.04.1992	1717/26.11.2011	
208. FC Mohammad Saleem	01.07.1990	1857/19.12.2011	
No.492			
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	11.12.1990	1900/27.12.2011	
No.168		111111111111111111111111111111111111111	
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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		- 8 -	·	32
262.	FC Zahid No.664	18.02.2002	1067/19.08.2013	
	FC Afsar Khan No.457	08.07.1998	1871/03.12.2013	
	FC Zia Ullah No.179	15.09.1996	1881/03.12.2013	
	FC Fida Mohammad	31.01.2002	1881/03.12.2013	
	No.1088	·		
266.	FC Fayaz No.708	28.06.1989	1888/03.12.2013	
	FC Hukam Zada No.946	12.08.1991	1888/03.12.2013	
	FC Abbas Khan No.1261	26.07.2006	1888/03.12.2013	
	FC Mohammad Sadiq	04.05.2006	1897/04.12.2013	
	No.620	,		
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.		75 (0.2004	2091/12.12.2013	
274.	FC Mohammad Tahir	31.01.2002	2097/13.12.2013	
	No.1086			
275.	FC Sarzamin No.342	31.01.2002	2097/13.12.2013	<u>:</u>
276.	FC Shafi Ullah No.1027	15.06.1993	2101/13.12.2013	
277.	FC Habeeb Ur Rehman	25.10.2004	2101/13.12.2013	
	No.692		0101/12 12 2012	
	FC Naseer Alam No.190	01.08.2008	2101/13.12.2013	47
279.	FC Noor Subhan No.865	20.08.1999	2106/13.12.2013	

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LIST OF C-II CONSTABLES

		The second secon
S.No	Name & No	D/O Enlistment D/O Birth 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 Igtidar Ahmad No.603	01:09.1990 20-09-1965 191/20.03.2002
· 2.	FC Fazle Amin No.152	14.12.1996 11.03.1975 656/08.07.2002
,3. 4.	FC Noor Ul Wahab No.970	01.12.1991 05-05-1972 966/19.09.2002
<u> </u>	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 All 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.		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:		17.01:1981 03:05:1963 639/30.05.2003
19.	FC Riaz Ahmad No.267	19.03.1987 19.06-1968 666/05.0b.2003
		12.08.1991 01-02-1968 667/05.06.2003
20. 21.	FC Aurang: '5 No.980 FC Zah, Gu No.485	31.07.1990 03:09-1971 7.11/12:06.2003
22.		28.03.1993 08-02-1969 869/12.07.2003
23.		12.08.1991 10-10-1971 895/18.07.2003
. 24.		01.10.1992 08.01.1972 896/18.07.2003
25.	FC Riaz Al374	03.07.1985 13-12-1966 921/19.07.2003
26.		28.06.1986 12-03-1966 921/19.07.2003
27.		25.09.1990 15-11-1969 988/18.03.2003
28.		2 1988. 05-01-1969 648/29.07.2004
<u>28.</u> 29.	FC Ishfa	.2000 12-04-1978 835/14.10.2004
30.	iso said	1982 02-01-1964 15/05.01.2005
31.		1992 07-07-1967 30/08.01.2005
32.		3. 1993 16-06-1973 57/14.01.2005
33.		3.1L 1995 01-07-1977 125/17.02.2005
34.	The second of	
		
	The second secon	
36.		1 19 1 15-03-1973 523/15.06.2006
37.		26. 995 10-04-1976 524/15 06.2006
3.8		01.1296 17-07-1978 532/17.06.2006
₹ <u>(39</u>	to be a supplied to the supplier of the suppli	
40		26.06.1996, 03,04.1975 139/08.02.2007
41.		01.07.1985 10-05-1967 188/24 02.2007
42.	10.251	20:11:1991 03:11:1973 12:12/05:10.2007
43.		01.12.1986 01-12-1968 1226/05.10.2007
44.	FC Privee II No.95	01.09.1992 05.05.1971 1235/06.10.2007
. 45	FUR 12 Gt (0.735	1 30.03.1994 1 23-05-1973; 1.1239/00.10.208/
46		07.07.1994 01-04-1971 1239/06.10.2007
47	1 1 4 2014 10 10 10 10 2	. 00,02,123,03
48		
49	Signatus Sain No.	
. 50		18:08:1991 7 07-04:1957 1255/06:10:2007
51		The second secon
52		02.08.1991 01-01-1972 1266/06.10.2007
53		07.12.1991 10-10-1993 1270/05.10.2007
54	FC Lal Mohammad No.847	10.07.1991 02-10-1972 1276/06:10.2007
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	*		- 2 -			<u> </u>
**************************************	55.	FC Imtiaz No.721	24.08.1989	05.04.1971		
-	56.	FC Inwan No:1056	28.09:1995		1279/06:10	
ļ	57.	FC Saleem Javid No.541	17:07.1991	15-02-1969	1280/06.10	
-	58	FC Iftikhar Hussan No.495	01.07.1990	29-04-1970	1286/06.10	
-	59.	FC Nawab Ali No.834	09.07.1991	07-02-1965	1286/06.10.	
	60.	FC Idrees Khan No.658	03.07:1996	25-02-1977	376/12.04.2	
-	61.	FC Amjid Ali No.567	01.07.1990	15-05-1972	470/10.05.2	
}	62.	FC Farhad Ali No.1005	05:07:1993	06-03:1968	524/13.05.2	
-	63. 64.	FC Shah Hassan No.296 FC Mohammad Ayub No.339	09.07.1998	26-09-1978	524/13.05.2	
 	65.	FC Said Ali Shah No.502	18.12.1994	01-06-1976	803/26.06.2	
 	66.	FC ljaz Ul Haq No 604	01.04.1999	13-02-1979	954/23:07:2	
	67.	FC Muhsin Raza No.472	01.07.1990 28.08.1995	05:03:1972	957/24.07.2	
1.	68.	FC Liagat Ali No 958	10.10.1990	20-05-1976 5 01-04-1971	1758/18.12	
.	69.	FC Fazal Mohammad No.1277	05:07:1993	03.01.1974	1762/18.12	
	70.	FC Nasir Khan No.1016	26:05:1999	10-01-1975	143/21.01.2 679/11.04.2	
	71.	FC Shujat No.806	· 06.07.1998	05:05:1977	950/30.05.2	
	72.	FC Arshid Ali No:1112	31.01.2002	22-07-1981	957/02.06.2	
<u> </u>	73:	FC Ghaffar Ali No.433	- 15,01,1995	03-04-1969	1300/24.06	
-	74.	FC Wazir Jamal No.517	- 01.07.1990	12-05-1970	1300/24.06	
	75,-	FC Mohammad Javid No.169	08:07.1998	02-06-1974	1313/25.06	
:	76.	FC Islam Shah No.461	08.07.1998	28-07-1978	1315/25.06	
:	77.	FC Qaisar Zaman No.581	20.08.1991	15-09-1968		
: ·	78.	FC Dost Mohammad No.799	08:07.1998	01-09-1977	1319/25.06	
<u> </u>	79.	FC Zafrullah No.443	11.12.1990	02-06-1970	1323/25.06	
	80.	FC Javid No.724	15.02.1996	09-04-1975	1323/25.06	
	81.	FC Imran Khan No.159	09:07:1998	15-04-1980		
	82.	FC Shah Room No.246	. 11:11.1999		1323/25.06	
	(83).	FC Hayat Khan No 883	23:09:1987			
	84.	FC Jawaz Khan No.696	20.03.1988	25-06-1967		
<u> </u>	85.	FC Jahanzeb No.194	28.09.1995	12-02-1973	1048/24.09	2010
1:	86.	FC Muhammad Kalam No.1310	25.05.2008	:12-12-1986	41/06.01.20	11
		FC Fazle Rehman No.1193	26.07.2007	03-03-1980	44/06.01.20	11
	88.	FC Mustahab Gul No. 1060	31:01.2002	13-01-1981	56/06.01.20	11
:	89.	FC Ishfaq No.1257	26.07.2007	05-05-1987	76/,10.01.20	11
<u>: </u>	90.	FC Mukhtaj Ud Din No.460	.01.07.1990	04-12-1970	393/16.03.2	011
<u> </u>	91.	FC Dawood Ur Rehman No.254	. 09.07.1998	15:11-1979	447/29.03.2	011
<u> </u>	92.	FC Adnan Khan No.610	07.08.1999	15-03-1981	669/16.05.2	011
<u> </u>	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
<u> </u>	95.	FC Niaz Ali No.137		01-01-1970		
<u> </u>	96.	FC Sikandar Khan No.835	10.07.1991	16-01-1971	 	,
	97.	FC Bahar Ali No.630	04:05.2006	21-04-1980	1431/03.09	
	98.	FC Waheed Khan No.1142	22.07.1998	08-02-1974		
<u> </u>	99.	FC Jan Raz No.1069	31:01.2002	10-03-1980	13 7 7 7	
<u> </u> -	100.	FC Anwar Mehmood NO.1304	01:08.2008	01-03-1985	1555/26.10	
<u> </u>	101.	FC Amjid Khan No.294	01:04:1992	07-06-1972	1717/26.11	
ŀ.	102	FC Mohammad Saleem No.492	01.07.1990	01-01-1969	1857/19.12	
<u> </u>	103.	FC Manzoor Ullah No 624	09,07.1998	16-03-1975	1857/19.12	
	104. 105.	FC Arshid No.175	17.09.1999	31-12-1977	1857/19.12	
+-	105.	FC Mohammad Shafiq No.168	11.12.1990	-03-02-1969	1900/27.12	
<u> </u>		FC Waheed No.621 FC Misbah Ullah No.990	31:01:2002	03.03.1982	27/05.01.20	
-	108.	FC Sher Hassan No. 1036	01:09:1992	13-03-1974	210/16.02.2	
<u> </u>		FC Sher Ajab No.937	08.01.1995	24-03-1974	210/16.02.2	
··· ·	110.	FC Jan Mohammad No.1250	24.04.1995	19-11-1972	210/16.02.2	
-	<u>`</u>	FC Nasrat Ali No:441	23.04.2004	14.04.1980	210/16.02.2	
-	112.	FC Sifat Ullah No.124	20.12.1999	20-10-1972	238/20.02.2	
-	113.	FC Nawsherawan No.330	03:01.1996	23-03-1975	247/21.02.2	
L	113.	The mawanerawan NO.33U 🔐 📶	09.07.1998	03-06-1975	312/07.03.2	U12

	, .				c75)
:			2		
~ ~	114.	FC Amjid Ali No.127	19.07.1999	10.10.1977	312/07.03.2012
<i>></i>	115.	FC Abid No.1183	26.07.2007	11-03-1987	312/07.03.2012
		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
 -		FC Alamzeb No.77	06:07.1998	15-09-1976	620/29.04/2012
 		FC Nigab Gul No.400	08.07.1998	07.08.1975	661/11.05 2012
 		FC Akbar Ali No.533	01.07.1990	03-03-1970	842/15.06 2012
		FC Mukhtyar Hussain No.796	19.03.1990	01-05-1970	877/27.06 2012
<u> </u>		FC Mohammad Zahir No.297	23.06.1996	02-03-1973	1102/30.08.2012
		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
		FC Ishfaq No.218	05.07.1994	16-06-1975	1247/05.10.2012
 		FC Ambar Shah No.747	19.09.1994	14-11-1975	1247/05.10.2012
H		FC Zahoor No.869	09.07.1998	04.06.1976	1359/07.11.2012
Ė		FC Gul Shah No.119	31.01.2002	13-07-1977	1369/12.11.2012
		FC Istikhar No.523	01.07.1990	05-04-1967	1391/27.11.2012
•		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
<u> </u>	134.	FC Wajid Ali No.780	04.05.2006	27-05-1977	199/06.02 2013
<u> </u>	135.	FC Baz Mohammad No. 1270	16.11.2011	21.09.1972	341/12.03 2013
		FC Qaşid 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
Ť		FC Sohail No.1152	10.08.1999	04-04-1977	381/20.03.2013
, -	140.		13.07.1998	10-11-1976	392/21.03.2013
	141.	FC Riaz Akbar No.1198	09.07.1998	09.04.1980 i°	1
	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
Ŀ	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
Ŀ	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
Ľ.	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.		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.	,	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
<u> </u>	159.		01.08,2008	09-02-1986	2101/13.12.20134
<u> · </u>	160.		20.08.1999	11-01-1975	2106/13.12.2013
<u></u>	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

7	·					<u> </u>
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.	lhsan 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	ОК
	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
i	12.	Khan Zali 49	196 8	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

ATC.





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

Munammad Diyar No.377

OB No <u>979</u> Dated <u>02/02</u> /2017

action to the:

District Police Officer, Nowsbera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 687076 /EC, dated Nowshera, the 0+1 /2017.

Copy of above is forwarded for information and necessary

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

AT C



DISTRICT POLICE OFFICER,

NOWSHERA

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:-

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

OB No 1925

District Police Officer,

Nowshera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. (49-7.5-8) /EC, dated Nowshera, the (3-7.5-1/2) /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 HQrs Nowshera.
- 5. Accountant
- 6. OHC.
- ウ、EMC.

C) **|** | |

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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 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

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 8640-44/EC, dated Nowshera, the J Copy of above is forwarded \for infor

2020. mation and necessary

action to the: -

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



REFERENCE ATTACHED

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

Y EC/

English felmer Jen de lemino. درخواست عُمراد نرقي عَفره DJ-40-998-R-ASP Cantl olt - 10 - 10 - 2002 لانے ازا کی لسط radentia تَدارِشَ بِهُ لَهُ مِنْ سَاكُلُ سَالَ 1988 مِينَ فَكُمْ لُولْسِ مِينَ كُسُتَتَ كانسل بعرت بيوانفا. مين نه أس سي لقريبًا 5- ع ماه قبل ك آفسران بالا بعن بي معاميان كو برائع عوره نرقى الن II على الن السك لَيْلَنْ فُو سِي حُونِيرُ ابِدِ كَا رَالُ ١١٠ لِسَافَ بِراَبِ عِنا مِبَالُ اللَّهِ لِيكِهِ حوكه أوراج بس نقن اورمس ن آج عماصال كوكي خ ارردخواس ہائے دے چکے ہے۔ لیکن میرے درحواستوں برائی نے تکے کا روالی . بیتل بیوئی ہے۔ جنامی والا. آب ماحمان کو ایک بار قعر بنرلے در دنواست است رعا لرخا به ول الرميل سروس رول ع مطالق ما قاعده أورا ج بيُوا بيُول في بررم كرك اورقالون عُمطالِق مبرا حق بنناجه في الناع السط برلاء كالم مادر فرماوس. عِينَ لَوْلَوْشَ اللَّهِ وَكَلَّى . 08-10-2002: is its ASP le mino list آبکا تابع بادشام ۱۶۱۶ مت منابع بادشام ۱۶۲۶ مت Forwarded and, Recommended. -08-10-2002 ASP COUNT 09-10-2002

137-40-483-ST-ASP. Out. at 13-05-92 , le min 69-80-81 رر فواست عمراد لانے ۱۱-ی اسط ·9 - dle - lia تزارش به ترمن سائلے 1988 میں کس کس لولسے میں بھرنی بوا خفا من سائل نے ٹرلفکے لورس ، فنگرفزین Lecure de de la Justin de la Justin de la A. I og la A. I og le Comballeo I. A. I كورس. I- B لورسير لهي باس كذي البلن در فسمتم _ س لوئر كورس خ كرس كا اور أوراج بيوانيون مبرا فالولاء. د آن بنتاجه کرفی زاری لیسط برال عمار رفرهادیل. عَين لوارش بيوكى. 12-05-2002-205 Tid ils de ville de FIF insite d'un est est l'été ASP-Gull. 2-05-2002 forwarded 12-05-2002

ر بخنوا سرو سر در پیونل رشا و

الهيد ومنجاب الميلانك ما رسًا مكان بنام مهم أورس ل

باعث تحريرا نكه

تقدمه مندرجه عنوان بالأمين البي ظرف me (mol wit a) be will 8, () 4) che آن مقام لشاور مقرر کرے اقر ارکیاجا تاہے۔ کہ صاحب موصوف کومقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامه کرنے وتقر رثالث وفیصله پرحلف دیئے جواب دہی اورا قبال دعویٰ اور بصورت وگری کرنے اجراءاوروصولی چیک ور دبیمارعرضی دعوی اور درخواست ہرشم کی تصدیق زرایں پردستخط کرانے کا اختیار ہوگا۔ نیزصورت عدم پیروی یاڈگری یکطرفہ یاائیل کی برامدگی اورمنسوخی نیز دائر کرنے اپیل نگرانی ونظر ثانی و پیروی کرنے کا مخار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کواپیے ہمراہ یا اپنے بجائے تقرر کا ختیار ہوگا۔اورصاحب مقرر شدہ کوبھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اوراس کاساختہ پر داختہ منظور وقبول ہوگا دوران مقدمہ میں جوخر چہ ہرجانہ التوائے مقدمہ کے سبب سے وہوگا کوئی تاریخ پیشی مقام دورہ پر ہو یا حدسے باہر ہوتو وکیل صاحب پابند ہول المستركے - كەبىروى مذكوركريں _للنداوكالت نامەلكھىديا كەسندرىپ -

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لساءر

BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Service Appeal No.5739/2021

Badshah Khan No. 717/LHC-C-II, Police Lines, Nowshera.

.....Appellant

V ERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others

.....Respondents

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Inspector Legal, Nowshera



Service Appeal No.<u>5739/2021</u>

Badshah Khan No. 717/LHC-C-H. Police Lines, Nowshera.

..Appellant

V ERSUS

- 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.
- 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.
- 7. That service appeal No. 45/2015 filed by appellant was dismissed on 17-05-2016 and leave was refused in C.P No. 404-P/2016 on 26-11-2019, hence, the instant appeal is barred by law.

Reply on Facts: -

- 1. Para to extent of joining Police department by the appellant pertains to record while regarding promotion of appellant to rank of C-II Head Constable as special case, it is stated that a committee under the Chairmanship of the then DPO Nowshera Rabnawaz Khan was constituted and on the recommendation of said committee all those C-II Head Constables including appellant who had been granted promotions on account of outstanding performance was withdrawn vide OB No. 1498 dated 02-12-2014. (Copy attached annexure-C of appeal).
- Regarding reversion of appellant from C-II Head Constable to constable, it is stated that appellant had earlier approached this Honourable Tribunal in shape of



appeal No. 45/2015 which was dismissed through a single judgment dated 17-05-2016. Feeling aggrieved from the said judgment appellant approached the Supreme Court of Pakistan through C.P No. 404-P of 2016. The petition was also dismissed and leave refused by the apex court vide order dated 26-11-2019. (Copies of service appeal is annexure "A" judgment of Service Tribunal dated 17-05-2016 is annexure "B" and order of the apex court dated 26-11-2019 is annexure "C").

- 3. Para already explained above.
- Incorrect. As per para 05 of standing order No. 06/2014 "Seniority of constables 4. placed on list C-II shall be determined from the date of entry into the promotion list C-II. Name of respondent No. 06 was brought on list C-II on 28-01-2000, similarly, name of respondent No. 07 was brought on the said list on 19-03-2002 while name of appellant was brought on list C-II on 01-02-2007, hence, respondent No. 06 & 07 stood senior to the appellant. 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").
- Incorrect. Appellant moved an application before Respondent No. 03 on which comments were sought from respondent No. 04 and case of appellant was thoroughly examined and then filed. (Copy of comments of respondent No. 04 is annexure "E" and order of respondent No. 03 is annexure "F").
- 6. Appeal of the appellant is 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 vogue by the respondents.
- B. Incorrect. For determining seniority of C-II Constables date of appointment is immaterial. As discussed in the preceding paras that as per para 05 of Standing Order No. 06/2014, seniority of constables on list C-II shall be determined from the date of entry into the promotion list C-II. As respondent No. 6&7 stood senior to the appellant on list C-II, therefore, they were promoted according to their seniority on their own turn. Similarly, appellant will also be promoted on his own turn as he stands at serial No. 28 in list of C-II Constables. (Copy of list C-II Constables is annexure "C").

- C. Para already explained above.
- D. Incorrect. As has been discussed above that appellant moved an application before respondent No. 3/2 tooth respondents are the same) on which comments were sought from respondent No. 04 and in the light of comments, case of the appellant was thoroughly examined and then filed.

E to I. Paras already explained above.

- J. Incorrect. No omission has been made by the respondents. As explained above appellant will be promoted on his own turn.
- K. As discussed above, appearant had earlier approached this Honourable Tribunal through service appeal No. 45/2015 which was dismissed on 17-05-2016 by this Honourable Tribunal. Similarly, C.P No. 404-P/2016 moved by the appellant against the order of this Honourable Tribunal was also dismissed and leave refused by the apex court of Pakistan.
- 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, Mh

Finance, Whyber Fahlmunkhwa, Civil Secretariat, Peshawar

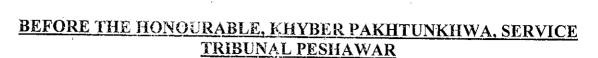
SECREGARY Respondent No. 02
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Deputy Inspector General of Police, Mardan Region-I, Mardan. Respondent No. 03&05

District Police Officer,

Nowshera. Respondent No.04



Service Appeal No.5739/2021

Badshah Khan No. 717/LHC-C-II, Police Lines, Nowshera.

.....Appellant

V ERSUS

- 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.
- 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

AFFIDAVIT

We the respondents No. 01 to 05 do hereby soleinnly 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 Examee, Keyber Kakhtunkhwa,

Civil Secretariat, Heshawar. Respondent No. 02

SECRETARY
Govi: of Khyber Pakhrunkhwa
Finance Depa:

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

> District Police Officer, Nowshera

> > Respondent No.04



SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 45-/2015

Badshah Khan, LHC No. 717/Reader C.Cell/DRC, District Nowshera.

APPELLANT

VERSUS

- 1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa, Peshawar.
- 2. The Deputy Inspector General of Police, Mardan Region-I, Mardan.
- 3. The District Police Officer, Nowshera.

RESPONDENTS

SECTION 4 OF THE UNDER APPEAL KHYBER **PAKHTUNKHWA** SERVICE TRIBUNAL ACT, 1974 AGAINST THE DEMOTION ORDER NO 1498 DATED BYTHE 2-12-2014 PASSED DISTRICT POLICE OFFICER, NOWSHERA WHEREBY THE (RESPONDENT NO. 3) APPELLANT WAS AWARDED PENALTY OF REDUCTION IN RANK FROM THE POST OF HEAD CONSTABLE (B-7) TO THE POST OF CONSTABLE (B-5) AND ALSO AGAINST THE ORDER NO. 8545-48 DATED TAKE BESSED BY THE RESPONDENT NO.2 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS "FILED" WITHOUT COGENT REASONS



PRAYER IN APPEAL

By accepting this appeal, the demotion order No. 1498 dated 2-12-2014 and rejection order No. 8545-46 dated 29-12-2014 passed by the respondents No. 2 & 3 may very graciously be set aside and the appellant may kindly be restored as Head Constable alongwith all back wages and consequential benefits.

RESPECTFULLY SHEWETH

Short facts giving rise to the present appeal are as under:-

- 1. That the appellant joined the service of Police Department as Constable (B-5) on 1-12-1988. He was then promoted as Head Constable (B-7) on 10-5-2010 as a special case, on account of his dedication, devotion and outstanding performance. The appellant was also awarded 19 "Commendation Certificates" regarding his exceptional performance. He had 26 years unblemished service record to his credit. (Copies of Promotion order and commendation certificates are appended as Annex-A & B).
- 2. That the appellant was performing his duty with great zeal, zest and devotion. But strangely, he was awarded major penalty of "reduction in rank" from the post of Head Constable (B-7) to the post of Constable (B-5) by an order dated 2-12-2014 passed by the District Police Officer, Nowshera (respondent No.3) (Copy of reversion order is appended as Annex-C).
- 3. That no charge sheet along with statement of allegations was served on the appellant to explain his position regarding allegations if any levelled against him on the basis of which the impugned order was passed. Similarly, no fair and impartial inquiry was conducted nor any show cause notice was given to him before awarding the major penalty of demotion as Constable (B-5).
- 4. That the appellant was also not provided any opportunity of personal hearing before passing the impugned order being the requirement of law.
- 5. That the appellant felt aggrieved by the said order, filed a departmental appeal with the Deputy Inspector General of Police, Mardan Region-I, Mardan, (respondent No.2) on 3-12-2014 within the statutory period of law, praying therein for setting aside the impugned order. The comments of the respondent No.3 were requisitioned and thereafter, the appeal was filed without any cogent reasons vide order dated 29-12-2014 (Copy of departmental appeal, comments and rejection order are appended as Annex-D, E & F).



6. That the appellant now files this appeal before this Hon'ble Tribunal inter-alia on the following grounds within the statutory period of law.

GROUNDS OF APPEAL

- A. That respondents have not treated appellant in accordance with law, rules and policy on the subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973. Therefore, impugned order is not sustainable in the eye of law.
- B. That the respondent No.3 was under statutory obligation to have served a charge sheet alongwith statement of allegations on the appellant so as to enable him to explain his position in respect of allegation if any levelled against him. But he failed to do so and as such blatantly violated the law/rules. Therefore, the impugned order is not sustainable under the law.
- C. That no fair and impartial "Inquiry Committee" was constituted in order to scrutinize the case of promotion in respect of appellant and other employees in its true perspective and in accordance with law. Moreover, the appellant was neither associated in the aforesaid so-called inquiry nor any witness was examined in his presence. Similarly, he was also not provided any chance of cross-examination. Therefore, the impugned order is against the spirit of administration of justice.
- D. That the appellant was not served with a show cause notice about the action of the authority in respect of awarding major penalty, being the mandatory requirement of law/rules. Therefore, the impugned is not tenable under the law.
- E. That the appellant was not provided any opportunity of personal hearing before imposition of major penalty of "reduction in rank" as Constable (B-5), in order to explain his view points in respect of the disputed issue. Thus, the appellant has been condemned / penalized without being heard, 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). The relevant citation is as under:-

(a) Administration of justice---

---Natural justice, principles of---Opportunity of hearing---Scope---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.

It is pertinent to mention here that the right of personal hearing is also proved from Holy Quran "that when Almighty Allah directed the Angels to bow down before Adam (P.B.U.H). All obeyed except Iblis (Satan) who was then provided an opportunity to

explain as to why he should not be expelled from the place of mercy. He after improper justification, was expelled from Heaven for ever (vide Surah Al-Baqarah Chapter No.2 Verse No. 34 Al-Quran). Thus, the Competent Authority has acted in derogation of law by not giving any opportunity of personal hearing to the appellant before passing the impugned order Therefore, the sald order is liable to be set aside on this count alone.

- F. That the appellant was granted the aforesaid promotion by the Provincial Police Officer, Khyber Pakhtunkhwa (respondent No.1). But the impugned order of his reversion in rank was passed by the District Police Officer, Nowshera (respondent No.3). Thus, the latter being lower authority in rank was not competent to set aside the order passed by his senior officer. Therefore, the impugned order is not warranted under the law.
- That the respondent No.2 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 failed to do so and disposed of the said appeal by simply saying "Filed" as apparent from the order dated 29-12-2014. Thus, this type of decision would not fulfill the requirement of law laid down by august Supreme Court of Pakistan in case reported in 2011-SCMR-1. The relevant citation is reproduced herein for facility of reference:

(h) General Clauses Act (X of 1897)--

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---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.

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- That the appellant was promoted as Head Constable (B-7) in accordance with law and this order has also been acted upon. Moreover, the appellant had worked against the said post for a period of 4 years and as such it had taken legal effect and created vested rights in his favour. Thus, the said order cannot be declared as illegal and the Principle of Locus Poenitentiae is attracted in the matter. Therefore, the impugned order is against the legal norms of justice.
 - That one Sher Bahadar was also granted similar promotion as Assistant Sub-Inspector on the basis of his outstanding performance (Copy Annex-G). But he was retained in the same capacity while the appellant was reverted in rank as Constable (B-5). Thus, the appellant has been discriminated and treated unfairly qua the above similarly placed employee. This is a disparity and anomaly and is also violation of Article 25 of the Constitution of Islamic Republic of Pakistan, 1973 which has unequivocally laid down that all citizens placed in similar circumstances are entitled to equal treatment and protection of law. The Hon'ble Supreme Court of Pakistan through various judgments has maintained that equal



treatment is the fundamental right of every citizen. Reliance can be placed on 2007-SCMR-410(d). The relevant citation is as under:

2007-SCMR-410(d) (D) CONSTITUTION OF PAKISTAN (1973)---

---Art. 25---Equal protection of law---Principles---Concept of equal protection of law envisages that a person or class of persons should not be denied the rights, which are enjoyed by other persons in the same situation.

Hence, impugned order is not tenable under the law.

- J. That the Competent Authority has passed the impugned order in mechanical manner and the same is perfunctory as well as non-speaking and also against the basic principle of administration of justice. Therefore, the impugned order has no sanctity under the law.
- K. That the impugned order is based on conjectures and surmises. Hence, the same is against the legal norms of justice.
- L. That the impugned order is suffering from legal infirmities and as such the same is not tenable under the law.
- M. That the appellant would like to seek the permission of this Hon'ble Tribunal to advance some more grounds at the time of arguments.

In view of the above narrated facts and grounds, it is, therefore, humbly prayed that the impugned order No. 1498 dated 2-12-2014 and rejection order No. 8545-46 dated 29-12-2014 passed by the respondents No. 2 & 3 may very graciously be set aside and the appellant may kindly be restored as Head Constable alongwith all back wages and consequential benefits.

Any other relief deemed proper and just in the circumstances of the case, may also be granted.

Dated: 13-12-2015

Through

Rizwanullah

M.A. LL.B

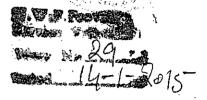
Advocate High Court, Peshawar.

Page 1 of 5 Ammen

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

Service Appeal No. 45 /2015

Badshah Khan, LHC No. 717/Reader C.Cell/DRC, District Nowshera.



APPELLANT

VERSUS

- 1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa, Peshawar.
- 2. The Deputy Inspector General of Police, Mardan Region-I, Mardan.
- 3. The District Police Officer, Nowshera.

RESPONDENTS

L. Q.

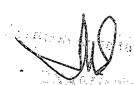
APPEAL UNDER SECTION 4 OF THE **KHYBER PAKHTUNKHWA** TRIBUNAL ACT. 1974 AGAINST **DEMOTION ORDER** NO 1498 **DATED** 2-12-2014 PASSED \mathbf{BY} THE DISTRICT POLICE OFFICER, NOWSHERA (RESPONDENT NO. 3) WHEREBY **APPELLANT** WAS AWARDED PENALTY OF REDUCTION IN RANK FROM THE POST OF HEAD CONSTABLE (B-7) TO THE POST OF CONSTABLE (B-5) AND ALSO AGAINST THE ORDER NO. 8545-46 DATED 29-12-2014 PASSED BY THE RESPONDENT NO.2 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS "FILED" WITHOUT COGENT REASONS.

17.05.2016

Appellant with counsel, Mr. Wisal Ahmad, Inspector(Legal) and Addll: AG alongwith Mr. Ziaullah, GP for respondents present.

Vide our detailed judgment of to-day in the connected service appeal No. 46/2015 titled "Nawab Ali-vs-Provincial Police Officer, Government of Khyber Pakhtunkhwa, Peshawar and others", this appeal is also disposed of as per detailed judgment referred above. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 17.05.2016





BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO. 45/2015 Date of institution ... 14.01.2015 Date of judgment ... 17.05.2016

Nawab Ali, LHC No. 834 Police Line, District Nowshera.

(Appellant)

VERSUS

- 1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa, Peshawar.
- 2. The Deputy Inspector General of Police, Mardan Region-I Mardan.
- 3. The District Police Officer, Nowshera.

(Respondents)



APPEAL UNDER SECTION-4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST THE DEMOTION ORDER NO. 1498 DATED 2.12.2014 PASSED BY THE DISTRICT POLICE OFFICER, NOWSHERA (RESPONDENT NO.3) WHEREBY THE APPELLANT WAS AWARDED MAJOR PENALTY OF REDUCTION IN RANK FROM THE POST OF HEAD CONSTABLE (B.7) TO THE POST OF CONSTABLE (B.5) AND ALSO AGAINST THE ORDER NO. 8545-46 DATED 29.12.2014 PASSED BY THE RESPONDENT NO.2 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS "FILED" WITHOUT COGENT REASONS.

Mr. Rizwanullah, Advocate.

For appellant.

Mr. Muhammad Adeel Butt, Additional Advocate General,

Mr. Ziaullah, Government Pleader.

For respondents.

MR. MUHAMMAD AAMIR NAZIR MR. PIR BAKHSH SHAH

MEMBER (JUDICIAL) MEMBER (JUDICIAL)

JUDGMENT

MUHAMMAD AAMIR NAZIR, MEMBER: The appellant Nawab Ali, LHC No. 834 Police Line, District Nowshera through instant appeal under section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.has impugned order dated 02.12.2014 vide which the appellant was reverted from the post of Head Constable(BS.7) to the post of Constable (BS.5). The appellant has also impugned order dated 29.12.2014 passed by respondent No.2 vide



which the departmental appeal submitted by the appellant against the above referred impugned order was filed without cogent reasons.

- Police Department as Constable (BPS-5) on 09.07.1991 and finally he was promoted as Head Constable C-II (BS.7) w.e.f 10.09.2011 on account of his dedication, devotion and outstanding performance. That the appellant was performing his duty in the higher scale but astonishingly he was reduced in rank from the post of Head Constable to the post of constable vide impugned order dated 02.12.2014 passed by respondent No.3. That the impugned order was passed without serving any charge sheet alongwith statement of allegations upon the appellant. Similarly, no inquiry what so ever was conducted nor any show cause notice was served upon the appellant before demoting him to the post of Constable. Moreover, the appellant has not been provided any opportunity of personal hearing before passing impugned order which is mandatory requirement of law. That the appellant felling aggrieved from the above referred impugned order filed departmental appeal, however the same was also filed by respondent to 2.2 without any cogent reasons vide order dated 29.12.2014. Feeling aggrieved from the impugned orders referred above, the appellant filed the present appeal.
 - 3. We have heard arguments of learned counsel for the appellant and learned Additional Advocate General as well as Government Pleader for the respondents and have gone through the record available on file.
 - From the record it is quite evident that the appellant was appointed as Constable (BS.5) in the Police Department and after performing duties as a Constable he was promoted to the rank of Head Constable C-II (BS.7) on account of his outstanding performance vide order dated 10.09.2011. Thereafter, the appellant started performing his duties in the next higher rank for about three years when in the meanwhile the appellant alongwith eight others were reverted to their substantive rank i.e Constable with immediate effect. Against the impugned reversion order, the appellant filed departmental appeal to the appellate authority, however the same was filed vide order dated 29.12.2014.



- Learned counsel for the appellant in his arguments, submitted before the Court that impugned reversion order of the appellant to lower rank is illegal and void ab-anitio as the appellant once promoted cannot be reverted back to the lower rank without issuance of charge sheet, statement of allegations and proper inquiry. Learned counsel for the appellant argued that no inquiry what so ever was conducted and similarly no right of personal hearing was provided to the appellant before passing the impugned order which is violation of the basic law on the subject, hence, the impugned order may be set aside and the appellant be restored as Head Constable. Learned counsel for the appellant placed reliance on 1997 SCMR 509,1995 PLC (C.S) 1140, 1997 SCMR 1073, 1998 SCMR 2013, 2000 SCMR 1743, PLD 2002 Supreme Court 46, 2004 SCMR 316, 2004 PLC (C.S) 473, 2004 SCMR 1031, 2008 SCMR 1369, 2008 PLC (C.S) 921, PLD 2008 Supreme Court 663, 2009 SCMR 412, 2011 SCMR 408, and 2015 PLC (C.S) 381. Learned counsel for the appellant contended that major penalty cannot be imposed upon the civil servant without holding proper enquiry as per dictum laid, down in the above referred judgments, hence, the impugned order be set aside.
- 6. The learned Additional Advocate General and Learned Government Pleader, while, rebutting the arguments advanced by the learned counsel for the appellant submitted before the court that the appellant has not been awarded major penalty of reduction in rank, rather, those constables who were promoted as C-II Head Constable out of turn without following the seniority list, were placed in their original position as constables and those who were senior to them were given their due seniority and placed as C-II Head Constables as per standing order No 6/2014. The learned Addl: AG placed reliance on 2010 PLC (C.S) 924 wherein it has been laid down by the august Court that out of turn promotion is not only against the Constitution, but also against Injunctions of Islam. Element of reward and award is good to install the spirit of service of community, but it should not be made basis of accelerated promotion.
- 7. The record transpires that the appellant was awarded accelerated promotion by the respondent No. 3/DPO on the basis of his outstanding performance vide order dated 10.09,2011, however the same was set aside and the appellant was reverted to his substant at



rank as constable vide impugned order dated 02.12.2014 upon the recommendation of the committee. Record further depict that the appellant has not been awarded the penalty of reduction in rank, rather those constables who alongwith the appellant were promoted as C-II Head Constables out of turn, were placed in their substantive rank and those constables who were senior to the appellant and were entitled to be promoted on the basis of seniority and cum-fitness were given their due right of promotion in the light of standing order No. 6/2014. Award of benefit to a person in violation of law would not attract principle of locus poenitentiae. Similarly, as laid down in 2010 PLC (C.S) 924 "Out of turn promotion is not only against the Constitution, but also against Injunction of Islam. Out of turn promotion in a public department generates frustration and thereby diminishes the spirit of public service. It generates undue preference in a public service. Element of reward and award is good to install the spirit of service of community but it should not be made basis of accelerated promotion." Hence, keeping in to consideration the above stated circumstances and dictum of august Court, we held that the respondents have rightly reverted the appellant alongwith others to their substantive ranks as constables by setting aside their accelerated promotion orders in order to provide due right to the constables senior to them, who are otherwise entitled to promotion as C-II Head Constable (BS.7) on the basis of seniority-cum-fitness. We see no force in the present appeal, which is hereby dismissed. Parties are, however, left to bear their own costs. File be consigned to the record room.

8. Our this single judgment will also dispose of in the same manner appeals No. 45/2015 titled Badshah Khan, No. 47/2015 titled Muhamamd Javed, No.143/2015 titled Jamshid Khan and No. 162/2015 titled Said Ali Shah where common question of law and lacts are involved.

ANNOUNCED

Sd Member 15/16

10-1600 / 12-Han Sd Member

Duney. (16)

SUPREME COURT OF PARISTAN

(Appellate Jurisdiction)

PRESERT:

Mr. Justice Guizar Ahmed Mr. Justice Maqbool Baqar

C.P.No.404-P of 2016

[Against the onter dated 17.05.2016, passed by the Chainson, Rhybert Pakteturature Service, Tribunal, Pechaneur in Service Appeal 710.45 of 2015]

Badshah Khan.

...Petitioner(s)

Versus

The Provincial Police Officer, Government of Khaber Pakhtunkhwa, Peshawar and others. ... Respondent

For the Petitioner(s)

: Mr. Zulfigar Ahmed Bhutta, ASC Syed Rifagat Hussain Shah, AOR

For the Respondent(s)

: N.R.

Date of Hearing

: 26,11,2019

ORDER

Gulzar Ahmed. J:- We have heard the learned counsel and have asked him to show us the rules as to how a Constable is promoted to the post of Head Constable and whether any DPC in this regard is involved. He has referred to a document [available at page-40], which a standing order, that refers to the Selection Board and it seems that the case of the petitioner was not processed through the Selection Board. Had it being so, some documents regarding it must have been filed by the petitioner, which apparently has not been done. Even otherwise, no substantial question of law of public importance in terms of Article 212[3] of the Constitution is raised. The petition is, therefore, dismissed and leave refused.

JUDGE

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JUDGE

Annex Do



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ORDER.

In pursuance of Standing Order No. 6/20 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/Hqrs, Nowshera	Member

Regional Police Officer,

No. 520-21/ES,

Dated Mardan the 28-01-12021.

Copy forwarded for information and necessary action to the:District Police Officer, Newshera w/r to his office Memo: No. 51276 Clusted 15.01.2021.

Superintendent of Police investigation, Nowshera.

FZY //

28/11/2021

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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 28-01-1021. 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:-

	<u></u> .	' .	
S#	NAME & NO.		DECISION TAKEN
1.	Talwar Ali Shah No 696	e care	Promoted
. 2.	Raj Bahadar No.128/PTS Swabi		Promoted
3.	Iftikhar No.392/FRP		Promoted
	Faiz Muhammad No.600		Promoted
	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.	Igtidar Ahmad No.603		Will be promoted subject to the availability of vacancy

NOOR AMAL KHAN) SP Inv: Nowshera (MEMBER)

(SAIF ALI KHAN)
DSP HQrs Nowshera
(MEMBER)

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

(9)

Government of Khyber Pakhtunkhwa Office of the Regional Police Officer,

CELEBRAT

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-/02/2021.

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.

Regional Police Officer,

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pp (ALSA)

清腦海拔



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 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

Dates 11/02/2021

action to the:

District Police Officer, Nowshera

OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

No. 1512719/EC, dated Nowshera, the 1102 /2021.

Copy of above is forwarded for information and necessary

- 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.



OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

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

To:

The

Deputy Inspector General of Police, Mardan Region-I, Mardan.

Mai dan Kegi

No. 2386

/EC, dated Nowshera the <u>1613</u> /2021.

Sübject:

APPLICATIONS

Memo:

Kindly refer to your office Endst: No. 1177/ES, dated 01-03-

2021.

It is submitted that comments on the applications of applicant FC Badshah Khan No. 717 and FC Hayat Khan No. 883 of this District are as under: -

That applicant Badshah Khan No. 717 had been promoted to the rank of Head Constable in the year 2010, however, he was reverted back to his substantive rank i.e constable vide OB No. 1498, dated 02-12-2014, on the recommendation of the committee constituted for the purpose, for the reason that applicant alongwith others had been granted out of turn promotion. Similarly, list of C-II constables was revised/prepared wherein names of C-II constables were placed according to placement of their names on C-II list.

Feeling aggrieved, applicant moved departmental appeal before the appellate authority i.e Deputy Inspector General of Police, Mardan, however, his appeal was filed vide order No. 8545-46/ES, dated 29-12-2014. The same order was challenged by the applicant before the Khyber Pakhtunkhwa, Service Tribunal, Peshawar through service appeal No. 45/2015. The Honourable Tribunal dismissed appeal of the applicant vide order dated 17-05-2016. Applicant then approached Supreme Court of Pakistan for grant of CPLA through C.P No. 404-P/2016, but the august court also dismissed the same and refused to grant leave.

It is worth to mention here that applicant is at serial No. 39 in seniority list of C-II Constable and he will be considered for promotion on his own turn.



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.

Numer (8)

Government of Khyber Pakhtunkhwa

Office of the Regional Police Officer, Mardan

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

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,

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Police Department

1- District N

<u>District Nowshera</u>

LIST OF C-II CONSTABLES

S.No	Name & No	D/O Enlistment	D/O Birth	Date of promotion
1.	FC Zar Badshah No.673	20.06.1988	01.05.1969	List C-II with OB No 1110/05.11.2002
2.	FC Zelam Khan No.770	08.12.1988	27-02-1967	
3.	FC Mughalbaz No.424	15.07.1985	15.07.1967	1273/23.12.2002 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	
6.	FC Zar Ali No.794	17.03.1990	27-04-1968	214/01.03.2003
7.	FC Imrad Ali No.549	01.07.1990	02-02-1970	215/01.03.2003
8.	FC Ibrahim No.516	01.07.1990	07-04-1969	409/15.04.2003
9.	FC Jan Wali No.575	01.07.1990		415/15.04.2003
10.	FC Farzand Ali No.748	17.07.1988	14-03-1968	450/22.04.2003
11.	FC Abdul Wali No.519		15-04-1966	554/08.05.2003
12.	FC Sajjad Akhtar No.903	01.07.1990	20-09-1966	581/17.05.2003
13.	FC Abdul Rauf No.314	11.04.1991	11.04.1969	616/25.05.2003
14.	FC Riaz Ahmad No.267	17.01.1981	03-05.1963	639/30.05.2003
15.	FC Aurangzeb No.980	19.03.1987	19-06-1968	666/05.06.2003
16.	FC Shamshad Ali No.927	12.08.1991	01-02-1968	667/05.06.2003
17.		12.08.1991	10-10-1971	895/18.07.2003
18.	FC Ayaz Ali No.994	01.10.1992	08.01.1972	896/18.07.2003
	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

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44. ـــــــــــــــــــــــــــــــــــ	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



			- 3 -		
\ <u></u>	93.	FC Sher Ajab No.937	24.04.1995	19-11-1972	210/16.02.2012
1. r	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.		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.		06.07.1998	15-09-1976	620/29.04.2012
<u> </u>	103.		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
		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
<u></u>	112.	FC Zahoor No.869	09.07.1998	04.06.1976	1359/07.11.2012
		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
ļ	118.	FC Qasid Ali No.1311	26.05.2008	10-06-1985	346/12.03.2013
<u></u>		FC Haider Zaman No.13	31.01.2002	12-03-1979	347/12.03.2013
<u></u>		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
		FC Riaz Akbar No.1198	09.07.1998	09.04.1980	431/02.04.2013
		FC Mohammad Ayub No.51	29.05.2007	04-01-1982	444/04.04.2013
<u></u>	125.	FC Raj Wali No.21	09.07.1998	14-03-1974	467/05.04.2013
		FC Kazim Ali Shah No. 1074	27.02.2002	27-08-1978	467/05.04.2013
		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
ļ	129.	FC Afsar Khan No.457	08.07.1998	20-03-1977	1871/03.12.2013
<u> </u>		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
<u></u>	132.	FC Fayaz No.708	28.06.1989	04-03-1970	1888/03.12.2013
<u> </u>	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
		FC Amin Ali No.345	25.10.2004	06.04.1978	2091/12.12.2013
-		FC Sarzamin No.342	31.01.2002	30-01-1980	2097/13.12.2013
		FC Shafi Ullah No.1027	15.06.1993	11-04-1971	2101/13.12.2013
<u> </u>		FC Naseer Alam No.190	01.08.2008	09-02-1986	2101/13.12.2013
		FC Noor Subhan No.865	20.08.1999	11-01-1975	2106/13.12.2013
L	141.	FC Saif Ali No.1166	22.01.2007	12.08.1979	1452/18.12.2019