FORM OF ORDER SHEET

Court of_____

Appeal No. 1334/2023

SÍNO.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	14/06/2023	The appeal of Mr. Rab Nawaz presented today by		
		Mr. Baseer Ahmad Shah Advocate. It is fixed for preliminary		
		hearing before Single Bench at Peshawar on		
	· · · ·	By the order of Chairman		
		REGISTRAR		
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal NO 1334/2023

Rab Nawaz Khan

.....Appellant

VERSUS

PPO & Others

. . . .

.....Respondents

S. No	Description of documents	Annexure	Pages
1. :	Service Appeal with Affidavit	***	1-4
2.	Stay application with affidavit	***	5-6
3.	Copy of Letter/Order dated 11-02- 2019	A	7-12
4	Copy of Letter dated 10-02-2023	В	13 - 16
5.	Copy of the Letter No 793-97/ES dated 10-02-2023	С	17-18
6.	Copy of departmental appeal	D	19-21
7	Copy of Police Rules 13-18 & Letter dated: 5-5-2023	E&F	22-24
8	Vakalat Nama	***	75

INDEX

Dated:-05-06-2023

Appellant

Through

BASEER AHMAD SHAH

& **IBAD UR REHMAN** Advocate,

OFFICE:-Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell # 0320-1946985 Email: ahmedbaseer234@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No1334 /2023

Rab Nawaz Khan Ali, Officiating Sub Inspector, No 589/MR, OII PS Garhi Kapura Mardan.

-----Appellant

VERSUS

- 1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
- 2. Regional Police Officer, Mardan Region Mardan.
- 3. District Police Officer, Mardan.
- 4. District Police Officer, Swabi.

.....Respondents

and the second second

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER ISSUED VIDE LETTER NO: 783-87/ES DATED 10-02-2023 WHEREBY THE OFFICIATING PROMOTION ORDER OF THE APPELLANT HAS BEEN TERMED AS ADHOC PROMOTION AND AGAINST WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:-

On acceptance of this appeal the impugned Letter/Order issued vide No 783-87/ES dated 10-02-2023 to the extent of the appellant may kindly be set aside and the appellant may kindly be confirmed as Sub Inspector w.e.f 10-02-2021, with all back benefits.

Respectfully Submitted:-

- 1. That the appellant was initially enlisted as Constable in Police department on 17-07-1995, was promoted as Head Constable in the year 2009, and was then promoted as ASI in the year 2019.
- 2. That the appellant during service, qualified various courses including Lower School Course, Intermediate and Upper School Course and is presently serving in police department of Mardan Region. The appellant along with others was confirmed as ASI on list "E" of Mardan Region, upon the recommendations of departmental promotion committee and after being confirmed as ASI on List "E" was accordingly promoted along with others as Officiating Sub Inspectors (BPS 14), upon the recommendations of Departmental Promotion Committee, vide Letter/Order dated 11-02-2019 by the Regional Police Officer Mardan. (Copy of Letter/Order dated 11-02-2019 is enclosed as annexure A).

3. That the appellant since enlistment performed his duties with honesty and full devotion and to entire satisfaction of his high ups.

- 4: That strangely the promotion order of the appellant was termed as adhoc promotion vide Letter/Order issued vide No 783-87/ES dated 10-02-2023, without assigning any valid/legal reason by the Regional Police Officer Mardan. (Copy of Letter dated 10-02-2023 is enclosed as annexure B).
- 5. That subsequently vide Letter/Order issued vide No 793-97/ES dated 10-02-2023, forty eight of the stated adhoc promotees were regularized as Officiating Sub Inspectors from various dates, (Copy of the Letter No 793-97/ES dated 10-02-2023 is enclosed as annexure C).
- 6. That the appellant preferred departmental appeal before respondent No 1 on 27-02-2023 and also filed Writ Petition No 837-p/2023 before the honorable Peshawar High Court Peshawar, which was dismissed being barred under Article 212 of the Constitution, however the departmental appeal of the appellant has not been responded despite the lapse of statutory period of ninety days. **(Copy of departmental appeal is enclosed as Annexure D).**
- 7. That the impugned Letter/Order issued vide No 783-87/ES dated 10-02-2023 to the extent of the appellant is against the law, facts and principles of justice on grounds inter-alia as follows:- /

GROUNDS:

- That the impugned Letter/Order issued vide No 783-87/ES dated 10-02-2023 to the extent of the appellant is illegal, unlawful, without lawful authority hence liable to be set aside.
- That mandatory provisions of law and rules have been badly violated by the respondents and the appellant has not been treated according to law and rules in violation of Article 4 and 25 of the Constitution and law of the land.
- **C.** That the appellant was promoted as Officiating Sub Inspector after due process of law besides upon the recommendations of departmental promotion committee thus the impugned order is illegal and void abinitio being passed ex parte, the appellant has been condemned unheard.

D. That the impugned Letter/Order is in violation of principles of natural justice, as no Charge Sheet and Show Cause Notice was issued to the appellant.

E. That valuable rights had accrued in favor of the appellant which cannot be snatched for no fault on part of the appellant.

F. That there is no omission or commission on part of the appellant and he cannot be punished for fault of others even if any.

G. That the appellant even completed his Pole "A" and Pole :B" period besides various courses, required for confirmation as Sub Inspector, as such was hopeful of his confirmation as Sub Inspector but shockingly the impugned order was passed in violation of law and rules.

H. That the appellant was entitled for confirmation as Sub Inspector after rendering two year service as officiating SI as per chapter 13-18 of the Police Rules and as per letter dated 05-05-2023 of respondent No 01, but his officiating promotion was even termed as adhoc.(Copy of Police Rules 13-18 & Letter dated 05-05-2023 is enclosed as Annexure E & F)

I. That the appellant was promoted as officiating SI against the vacant valid vacancy.

That even there is no eligible candidate in Fast Track quota, as in the year 2022/2023 eleven candidates had applied for promotion in Fast Track quota, of whom six candidates did not appear in exam while the rest five remained unsuccessful in exam, thus too the impugned order is liable to be set at naught.

K. That the impugned Letter/Order is also not speaking one, as per Section 24-A (2) of the General Clauses Act 1897, thus too the same is liable to set at naught.

L That the appellant has been deprived of his due rights without any omission and commission on his part.

M. That the appellant has about 25 years of service with unblemished service record.



It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.

Any other relief deemed appropriate in the circumstances of the case and not specifically asked for may also be granted in favor of the appellant.

Dated:05-06.-23

Appellant

Through

Baseer Ahmad Shah

& Ibad Ur rehman Advocates

LIST OF BOOKS

- 1. Constitution 1973.
- 2. other books as per need

CERTIFICATE:

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

AFFIDAVIT

ADVC

I, Rab Nawaz Khan Ali Officiating Sub Inspector No.589/MR,OII PS Garhi Kapura Mardan do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by

Baseer Ahmad Shaf

Advocate Peshawar



BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No_____/2023

Rab Nawaz Khan

.....Appellant

VERSUS

PPO & Others

..... Respondents

Application for the suspension of impugned Letter/Order No 783-87/ES dated 10-02-2023 till the final disposal of titled appeal.

Respectfully Submitted:-

- 1. That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
- **2.** That the appellant was promoted as officiating Sub Inspector according to law and as per Police Rules 13-18 was entitled for confirmation as SI, but strangely his promotion was termed as adhoc in violation of law and rules.
- **3.** That the applicant has got a good prima facie case and is sanguine of its success.
- 4. That the balance of convenience lies in his favor and if the impugned order/letter is not suspended, the applicant would suffer irreparable loss.

It is therefore prayed that on acceptance of this application, the impugned letter/order issued vide NO 783-87/ES dated 10-02-2023 may kindly be suspended till the final disposal of titled appeal.

Dated:- 05-06-2023

Appellant

Through

BASEER AHMAD SHÀHÙ

ADVOCATE.

XLe

AFFIDAVIT

I, Rab Nawaz Khan Ali Officiating Sub Inspector No.589/MR,OII PS Garhi Kapura Mardan do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

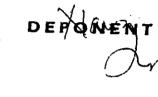
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Identified by

Baseer Ahmad Shah

Advocate Peshawar

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Government of Khyber Pakhtunkhwa

Office of the Regional Police Officer, Mardan

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

To:

- 1. Additional Inspector General of Police Special Branch, Khyber Pakhtunkhwa, Peshawar.
- 2. Capital City Police Officer, Peshawar. "
- 3. Deputy Inspector General of Police CTD, Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police Traffic, Kyber Pakhtunkhwa, Peshawar. 4.
- Deputy Commandant Elite Force Khyper Pakhtunkhwa, Peshawar. S.
- AIG/BDU Khyber Pakhtunkhwa, Peshawar. 6.
- All District Police Officers, Mardan Region. 7.
- All Head of Investigation in Mardan Region. 8.
- Principal EPTC, Nowshera. ₽.

No. 1190-10041ES.

PROMOTION AS DEFICIATING SUB INSPECTORS. Subject:

Memo; Consequent upon recommendation by the Departmental Promotion Committee held in this office on 22.01.2019, the following confirmed ASIs/on list "E" of Mardan Region have been considered suitable for promotion as Offg: SIs in (BPS-14); subject to the condition lay down equinst each:-

// , February, 2019

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S. No.	Name & Rank	Place of Posting	Decision
1.	ASI Haroco Khar No.173/HR	Swabi District	Recommended for promotion Conditionally subject to Court Decision. He shall qualify Handatory Training/Courses as per Police Rules 19-25A, carning 07 marks within six months.
. 2.	PASI Sved Betterrand Snah No. 309/MR	Charsedda District	Recommended for promotion Conditionally, He shall quality Handatory Training/Courses as per Police Rules 19-25A, earning O2 marks within six months
з.	PASI Aman Ulah No. 310/HR	Swabi District	Recommended-for-promotion Conditionally, He shall quality Handatory Training/Courses as per Paice Rules 19-35A, earning 07, marks within six months.
	PASI Sodique Arber No. 306/MR	Swabı Districz	Recommended for promotion Conditionally, He shall qualify Handatory Training/Courses as per. Poice Rules 19-25A, carning 07, marks within six montlis,
: · 5. ·	PASI Humair Hussain No. JOS/MR	Handan District	Recommended for promotion Conditionally, He shall qualify Handatory Training/Courses as per Police Rules 19-25A, earning 04 marks within six months.
6.	PASI Bişmilah Jan Ko. 312/14R ¹	Swabl District	Recommended for promotion Canditionally. He shall qualify Mendatory Training/Courses as per Police Rules 19-25A, earning 05 marks within six months.
7.	PASI Hidayat Ultah No. 306/MR	Charsadda District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, eerning 04 marks wattin six months.
5 .	MST States Annual No. 715/KR	Hersen Doorid	Recommended for promotion Conditionally Ne shell county Handatory Training/Counces and per Police Rules 19-254," earing D1 movies within six months.



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

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

- 1. Additional Inspector General of Police Special Branch, Khyber Pakhtunkhwa, Pesnawar.
- Capital City Police Officer, Peshawar. 2.
- Deputy Inspector General of Police CTD, Khyber Pakhtunkhwa, Peshawar. 3.
- Deputy Inspector General of Police Traffic, Khyber Pakhtunkhwa, Peshawar. 4.
- 5. Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
- 6. AIG/BDU Khyber Pakhtunkhwa, Peshawar.
- All District Police Officers, Mardan Region. 7.
- 8. All Head of Investigation in Mardan Region. 9
 - Principal EPTC, Nowshera.

No.1190-1204/ES.

11, February, 2019

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Subject:

To:

PROMOTION AS OFFICIATING SUB INSPECTORS

Memo:

Consequent upon recommendation by the Departmental Promotion Committee held in this office on 22.01.2019, the following confirmed ASIs/on list "E" of Mardan Region have been considered suitable for promotion as Offg: Sis in (BPS-14) subject to the condition lay down against each:-

S.No.	Name & Rank	Place of Posting	Decision
1.	ASI Haroon Khan No. 173/MR	Swabi District	Recommended for promotion Conditionally subject to Court Decision. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
2.	PASI Syed Bahramand Shah No. 309/MR	Charsadda District	Recommended for promotion Conditionally He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 02 marks within six months.
3.	PASI Aman Ullah No. 310/MR	Swabi District	Recommended for promotion Conditionally, He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
4 .	PASI Sadique Akbar No. 308/MR	Swabi District	Recommended for promotion Conditionally He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
5.	PASI Humair Hussain No. 305/MR	Mardan District	Recommended for promotion Conditionally, He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 04 marks within six months.
5.	PASI Bismillah Jan No. 312/MR	Swabi District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 05 marks within six months.
2	PASI Hidayat ULlah No. 306/MR	Charsadda District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 04 marks within six months.
I.	PASI Shabbir Ahmad No. 315/MR	Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A. earning 04 marks within six months.



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	PASI Zahid Nawaz Ho, 307/MR	Swebe District 🐒	Recommended for pre-motion Conditionally He shall missify Hamilatury frammu/Conners as per Police Rules 16:25A, company in merchan within sie months.
. 10.	PAST ATTAL HISSTEIN NO. 314/MR	Smath District	Recommended for premation Conditionally He shall qualify Manuatory Transmy/Courses as per Police Rules 19 25A, earning 07 minus within mit months.
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	Ast Renews Khan Ho. 554/MR	Harden District	Recommended for promotion Conditionality He shall qualify Hentakey Training/Conjest ab for Palce Redea 38-354, Hentakey 777 Mirror 107 Mirror
	ASI Inche Khen Ro. 555/MR	Marrian District	Recommended for promotion Constituentity the phall quality Handware Training Courses as per polos ander 18-254 animal 199 Martin Without months
44 (13) 	ASI Week Khen No. 536/NR	Con Argunation 10, 1 Special Branch Fram Smeth Destroit	Recommended the premitien Conditionally
1.16	AST Khim Muhammad No.	On deputation (0) - CTD KPK from Smabl Destrict	Recommended for prematien Conditionally (He shall quality ' Harvintery- Training/Condition ally) per prince Revenue 3 - 254, Service 193, Marine White all months
	ASI Farang Mustain No	On deputation to " EFTC Norsherd"	Recommended for presentation Conditioning of the second se
	ASI Qasim Khan No. 559/HR	On deputation (g CTD XPK from Swate District	Recommended for premilien Conditionally Herman Gualey Harviatory Tahimarchites at per Police Rules 210 284, sensing 16 (Barts)
	A STATE AND A STORES	On deputation to Traffic Peshawar -from Hardan -District	Recommended for promotion Cuild Linnally, Subject to production of mativacting Active dui- ting year 2014 a. 2017 within 15 days little Arield Jun My (Manuacov) Transmuscropped for high Police Rules 19-25A, Garning DZ Histora, Hittory Islamonthe
	ASI Javid Annad No. 711/HR	Harden District	Recommended for premeiten Cénultinnelly Netfelt quality, Mandelogy, (retunn/center of per failes autes 19-354: Anthony Crement willed in months
A 31	AST Ances Ahmad No. 561/HA	On deputation to Traffic Pestimika From Marcant H Oldrict	Recommended fur erometter Conditionally: The sust outery Handatory Familing/Codress as per Police, Rudes, 19 254, anright the fingues with full months.
- 22	ASI Sail IR Islam No. 562/MR	Hardan District	Recommended for premetion Conditionally He shall qualify thandatory Training Courses a Ser (police Rules 17:25A, Bérling OD (maint) welling the monthest
23		Harden District	Recommended for premotion Conditionality Heritial quality Hendelory Treining/Cotrists is per Rolice Rules U-25A, ewring 07 marts
	ALL LAND HOTE BO. SEI/MR	On Croitedan la 7 BOU KAK from - Smote Obstrict	Recommended for promotion Canditionality, He shall queldy Hendercry Training Contract its per Police Public 19-25A services (66 marks) with the second
	Contraction And Services	Samuel Bastrict	Recommended for premition Conditionally. In shall quarty Hamistory Transformer Contest of per, Pulce Pares 19-254, service 06, marked health are presents.

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9.	PASI Zahid Nawaz No. 307/MR	Swabi District	Recommended for promotion Conditionally He shall qualify Mandalory Training/Courses a per Police Rules 19-25A, earning 09 marks with six months.
10.	PASI Altaf Hussain No. 314/MR	Swabi District	Recommended for promotion Conditionall He shall qualify Mandatory Training/Courses a per Police Rules 19-25A, earning 07 marks with six months.
11.	PASI Baidar Bakht No. 311/MR	Charsadda District	Recommended for promotion Conditional He shall qualify Mandatory. Training/Courses a per Police Rules 19-25A, earning 05 marks with six months.
12.	ASI Ayaz Ali No. 549/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, parming 09 marks with six months.
. 13.	ASI Kameen Khan No. 554/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 07 marks with six months.
14.	ASI imliaz Khan No. 555/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 09 marks with six months.
15.	ASI Waqif Khan No. 556/MR	On deputation to Special Branch from Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 09 marks with six months.
16. [.]	ASI Khan Muhammad No. 557/MR	On deputation to CTD KPK from Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 07 marks with six months.
17.	ASI Farooq Hussain No. 558/MR	On deputation to EPTC Nowshera from Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 03 marks with six months.
18.	ASI Qasim Khan No.559/MR	On deputation to CTD KPK from Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 06 marks with six months.
19.	ASI Noorul Islam No. 560/MR	On deputation to Traffic Peshawar from Mardan District	Recommended for promotion Conditional subject to production of satisfactory ACRs for t year 2014 & 2017 with 15 days. He shall qual Mandatory Training/Courses as per Police Rul 19-25A, earning 07 marks within six months.
20.	ASI Javid Ahmad No. 711/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 06 marks with six months.
21.	ASI Anees Ahmad No. 561/MR	On deputation to Traffic Peshawar from Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 06 marks with six months,
22.	ASI Saif UI Islam No. 562/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 08 marks will six months.
23.	ASI Bashir Ahmad No. 650/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 07 marks will six months.
24.	ASI Umar Hayat No. 563/MR	On deputation to BDU KPK from Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 06 marks with six months.
25.	ASI Akhtar Munir No. 564/MR	Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 0C marks with six months.

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	ASL GUL Holik Ho. 545/119	- Chorsadda Distra	t per Police Rules 19-25A, earning 06 marks	1
27.			within ser months.	j
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		· · · · · · · · · · · · · · · · · · ·	Recommended for promotion Conditionally.	
	ASI Hamayun Ho 651,058	Mardan District	He shall qualify Mandatory Training/Courses as	
- 28.			cer Police Rules 19-25A, earning 05 marks	
			within six months.	
·· · · ·	∮····································		Recommended for promotion Conditionally.	
	ASI IRIANAT SHAS NO SEGAR	Swabi District	He shall qualify Mandatory Training/Courses as	
29.			per Police Rules 19-25A, earning 03 marks	
:		l .	within six months.	
	<u> </u>	- }	Recommended for promotion Conditionally.	
`	ASI ATE UP Rehmon (L)	Manda - Cara	He shall qualify Mandatory Training/Courses as [
30,	582/MR	Mardan District	per Police Rules 19-25A, carring 08 marks	· •
,		1.	within six months	•
		- 	Recommended for promotion Conditionally.	
	AST Syed Saleem Nawaz Ho.	Narden District	He shall quality Mandatory Training/Courses. as	
51.	652/HR	maroan District	per Police Rules 19-25A, earning 07 marks	•
·. ·			within six months.	
	<u> </u>	1	Recommended for promotion Conditionally.	
1	ASI Ayaz Huhamman tia.	Curshi Dint	He shall qualify Mandatory Training/Courses as	
	653/MR	Swabi District	per Police Rules 19-25A, earning O6 marks	
-1		ļ .	within six months.	· 10
		<u> </u>	Personal design and the second s	win
	ASI NAZ AN NO. SET/MR		Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as	
33;-	The second second second	Hardan District	per Police Rules 19-25A, earning 07 marks	
		1	within six months.	TEŜT
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s	ASLADdal Salam No. 568/MR	Handan Al-ad-	Recommended for promotion Conditionally	
34.	Sob/MR	Mardan District	per Police Rules 19-25A, earning, 05 marks	
•			within six months.	
			Recommended for promotion Conditionally.	• •
35.	ASI Javid No. 569/MR	Marcan District	He shall qualify Mandatory Training/Courses as	
			per Police Rules 19-25A, earning 07 marks	
		· · · ·	within six months.	
			Recommended for promotion Conditionally.	
36.	ASI Jenangir Khan No. 570/HR	Hardan District	ne shall Guality Mandatory Training/Commences	
· .		· .	per Police Rules 19-25A, earning 06 marks within six months	
		• •	· · · · · · · · · · · · · · · · · · ·	
	ASI Mutiammad Zubair No.	On deputation to	Recommended for promotion Conditionally.	
:: 37.	654/HR	Eite Force KPK-		
. 1		from Swabi Distoct	For the NUMB ISTING PARTING OF mouther I.	:
			within six months.	
ii			Recommended for promotion Conditionally.	
a 38. (ASI Parwar All No. 571/MR	Nardan District	He shall qualify Mandatory Training/Courses as	
			per Police Rules 19-25A, carning 07 marks	:
	1.			
ar in a			Recommended for promotion Conditionally:	A 1
	ASI Shah Hussin ta store	On deputation to'	Subject to production of satisfactory ACR for the year 2014 within 15 days	•
39.		Swattl District	year 2014 within 15' days. Ne'shall qualify	
			Mandatory Training/Courses as per Police Rules 19-25A, earning 06 marks within six months.	•
ŝ.			a share within the months is a	
5.40.1	ASI Shoht Mult No. CETTING		Recommended for promotion Conditionally,	
-	List.	Swabi District	He shall quality Handatory Training/Courses as	
		•	per Police Rules 19-25A, earning 07 marks	
(1, 1)		<u> </u>		
		T .	Recommended for promotion Conditionally.	•
ar l	ASI Diaf Hussian No. 573/HR			<u>^</u>
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			shall quality Handscory Traving Courses as per police Rules 19-25A, earning 05 marks within	11.1
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26.	ASI Shah Jehan No. 712/MR	Mardan District	Recommended for promotion Condition He shall qualify Mandatory Training/Course per Police Rules 19-25A, earning 09 marks six months.
27.	ASI Gul Malik No. 565/MR	Charsadda District	Recommended for promotion Condition
28.	ASI Hamayun No. 651/MR	Mardan District	Recommended for promotion Condition He shall qualify Mandatory Training/Course per Police Rules 19-25A, earning 05 marks v six months.
29.	ASI Iftikhar Shah No. 566/MR	Swabi District	Recommended for promotion Condition He shall qualify Mandatory Training/Course per Police Rules 19-25A, earning 03 marks w six months.
30.	ASI Aziz Ur Rahman No. 582/MR	Mardan District	Recommended for promotion Condition He shall qualify Mandatory Training/Course per Police Rules 19-25A, earning 08 marks w six months.
31.	ASI Syed Saleem Nawaz No. 652/MR	Mardan District	Recommended for promotion Condition He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 07 marks w six months.
32.	ASI Ayaz Muhammad No. 653/MR	Swabi District	Recommended for promotion Condition He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 06 marks w six months.
33.	ASI Niaz Ali No. 567/MR	Mardan District	Recommended for promotion Condition He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 07 marks wi six months.
34. ·	ASI Abdul Salam No. 568/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 05 marks wi six months.
35.	ASI Javid No. 569/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 07 marks with six months.
36.	ASI Jehangir Khan No. 570/MR	Mardan District	Recommended for promotion Cosditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 06 marks with six months.
37.	ASI Muhammad Zubair No. 654/MR	On deputation to Elite Force KPK from Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 05 marks with six months.
38.	ASI Parwar Ali No. 571/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses a per Police Rules 19-25A, earning 07 marks with six months.
39,	ASI Shah Hussain No. 572/MR	On deputation to CTD KPK from Swabi District	Recommended for promotion Conditional Subject to production of satisfactory ACR for the year 2014 within 15 days. He shall qualit Mandatory Training/Courses as per Police Rule 19-25A, earning 06 marks within six months
40.	ASI Shahi Mulk No. 655/MR		Recommended for promotion Conditionally He shall qualify Mandatory Training/Courses a per Police Rules 19-25A, earning 07 marks within six months.
41.	ASI litaf Hussain No. 573/MR	Mardan District	Recommended for promotion Conditionally Subject to production of satisfactory ACR for the year 2014 & 2017 within 15 days. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 09 marks within six months.

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	52. 53. 55. 55. 55. 57.	ASI FEWER ALI NO. SOLIMA ASI FEWER ALI NO. SOLIMA ASI Soliti Inda No. SELIMA ASI Soliti Inda Atmen No. 713/MR ASI Soliti Ali Inda Soliti No. 354 MR	Marciar District Marciar District Marciar District Marciar District Marciar District Marciar District Marciar District Col Assumption III Col Assumption III District District District District District District District	Recommended for manimum Coefficients He shall guild Manager Theory Constrained to Point Rules 19-19, and a marked manager for prosector Coefficients He shall guild Manager Transformed a per Point Rules in 19-19, and 19 marked per Point Rules for prosector Coefficients He shall guild Manager Transformed a per Point Rules in 20-19-19, and 19-19 Marked Statistics The prosector Coefficients of Frail guild Manager Transformed a per Point Rules in 20-19-19, and 19-19 Marked Statistics The prosector Coefficients the Shall guild Managers Transformed a memory of the prosector Coefficients the Shall guild Managers Training Courses a memory of the prosector Coefficients per Point Rules 19-29, arming Courses a memory of the prosector Coefficients per Point Rules 19-29, arming Courses a mine surports. Recommended for prosector Coefficients per Point Rules 19-29, arming Courses a mine surports. Recommended for prosector Coefficients arming Rules 19-29, arming Courses a set for Rules 19-29, arming Courses a mine surports. Recommended for prosector Coefficients arming Statistics arming Rules 19-29, arming Courses a arming Statistics for Statistics Prosector Coefficients arming Statistics arming Statistics for Statistics Statistics for Statistics Statistics for Statistics Statistics Recommended for prosector Coefficients arming Course and arming Statistics for Statistics Statistics for Statistic	ATTESTED
	52.53	ASI FEWER ALI NO. SOLIMA ASI FEWER ALI NO. SOLIMA ASI Soliti Inda No. SELIMA ASI Soliti Inda Atmen No. 713/MR ASI Soliti Ali Inda Soliti No. 354 MR	Marciar District Marciar District Marciar District Marciar District Marciar District Marciar District Marciar District Marciar District Co. desuration 12 CO. desuration 12 District District District District Co. Securation 12 District Co. Securation 12 District Di	Recommended for antimetor Coefficients He shall water in antimetor Coefficients and the second second second second second welling a month. Recommended for promotion Coefficients He shall call, Manager Transport of the elter second second second second second elter second second second second second for the second second second second second effort second second second second second second effort second second second second second second second second second second second second second effort second second second second second effort second second second second second second effort second second second second second second effort second s	ATTESTED
	51 51 55 55 7 55	ASI FEWER ALI NO. SELIMA ASI FEWER ALI NO. SELIMA -SI Mithammed Tenie No. 713/MA ASI Sector Alimet No. 713/MA ASI Sector Alimet No. 554 MA ASI MARCA ALIMA	Marcar Cistrict Marcar District Marcar District Marcar District Marcar District Marcar District Col Assurances Col Assurances District Dis	Recommended for anatomor Coefficients He shall water in an organized for the second for an an organized for the second for for the secon	ATTESTED
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	51 51 55 55 7 55	ASI FEWER ALI NO. SOLIMA ASI FEWER ALI NO. SOLIMA ASI FEWER ALIANT FEWER NO. 712/MA ASI FEODE ALIANT NO. 712/MR ASI FEODE ALIANT NO. 554 MR ASI FEODE ALIANT NO. 554 MR	Marciar District Marciar District Marciar District Marciar District Marciar District Marciar District Marciar District Co. descenages 23 CO. Jesurandon 23 CO. Jesurandon 23 District D	Recommended for manner of Constrained by shall guild workers "many Course a ber Police Rues 19-154, entry Course a wellings, manner he shall guild for promotion Constrained he shall guild for promotion Constrained by Police Rues 19-154, entry Courses a ber Police Rues 19-154, entry Courses a the shall guild for promotion Constrained he shall guild for promotion Constrained by Shall guild for promotion Constrained he shall guild for promotion Constrained wells for promotion Constrained he shall guild for promotion Constrained wells for promotion Constrained he shall guild for promotion Constrained he shall guild for promotion Constrained by Police Rues 19-154, earling Courses a wells for promotion Constrained he shall guild for promotion Constrained he shall guild for promotion Constrained by Police Rues 19-154, earling Courses a with shall guild for promotion Constrained he shall guild	ATTESTED
	51 52 53 55 55 55	ASI FEWER ALI NO. SOLIMA ASI FEWER ALI NO. SOLIMA ASI SOLITIZINA ASI SOLITIZINA ASI SOLITIZIANA ASI SOLITIZIANA	Marcar Clathat Marcar Clathat Marcar District Marcar District Marcar District Marcar District Colorestation to Colorestation to Ethe Forte KOK Storet Storet Colorestation to Colorestation to	Recommended for manimum Coefficients Resourcementer for manimum Coefficients Der Police Rues 19-154, enning Connected Recommender for promotion Coefficients Recommender for promotion Coefficients Recom	ATTESTED

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42.	ASI Janab Ali No. 574/MR	Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 09 marks with six months.
43.	ASI Zulfiqar No. 575/MR	Mardan District	Recommended for promotion Conditional
44	ASI Shahab Ali No. 576/MR	Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 09 marks with six months.
45.	ASI Niaz Muhammad No. 577/MR	On deputation to CCP/Peshawar from Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 02 marks with six months.
46.	ASI Muhammad Zahir No. 578/MR	On deputation to CTD KPK from Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses a per Police Rules 19-25A, earning 02 marks with six months.
47.	ASI Ghaffar Ali No. 656/MR	Swabi District	Recommended for promotion Conditionall He shall qualify Mandatory Training/Courses a per Police Rules 19-25A, earning 09 marks within six months.
48.	ASI Subhan Ullah No. 657/MR	Swabi District	Recommended for promotion Conditionally He shall qualify Mandatory Training/Courses a per Police Rules 19-25A, earning 07 marks withi six months.
49.	ASI Farooq No. 579/MR	Swabi District	Recommended for promotion Conditionally He shall qualify Mandatory Training/Courses a per Police Rules 19-25A, earning 06 marks within six months.
50.	ASI Gul Bahadar No. 580/MR	Mardan District	Recommended for promotion Conditionally He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
51.	ASI Fawad All No. 581/MR	Mardan District	Recommended for promotion Conditionally He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 06 marks within six months.
52.	ASI Bakht Zada No. 583/MR	Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
53.	ASI Muhammad Tahir No. 718/MR	Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 03 marks within six months.
54.	ASI Saljad Ahmad No. 713/MR	Nowshera District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
55.	ASI Fakhre Alam No. 584/MR	On deputation to CCP/Peshawar from Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, daming 03 marks within six months.
56.	ASI Wajid Ali No. 585/MR	On deputation to Elite Force KPK from Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory' Training/Courses as per Police Rules 19-25A, earning 02 marks within six months.
57.	ASI Shah Jehan No. 586/MR	On deputation to CTD KPK from Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
58.	ASI Niaz Muhammad No. 587/MR	On deputation to Elite Force KPK from Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 06 marks within six months.

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4 557 500 00 00 00 00 00 00 00 00 00 00 00 00	Maria Daina	Recommended for promotion Conditionally, the shall qualify Mancatory Training/Courses as them Police Rules 19-25A, earning 09 marks within stamonths.
ASE kellikher Ahmund the Th	Prince CEP/Peshawar CEP/Peshawar from Swabn District	Recommended for promotion Conditionally. He shall qualify Handatory Training/Courses as per Porce Rules 19-25A, carning OBmarks within six months.
ASD Rab Rawat No. 539/76	Swath District	Recommended for promotion Conditionally. He shall cualify Handatory Training/Courses as per Police Rules 19-25A, earning 05 marks within six months.
ASI REPAID AN NO. SPOTER	Swabi District	Recommended for promotion Conditionally. Ho shall qualify Handatory Training/Courses as per Police Rules 19-25A, earning OSmarks within six months.
ASI INCCLAR AD NO. 591/MR	Handen District	Recommended for promotion Conditionally. He shall qualify Handetory Training/Courtes as per Police Rules 19-25A, earning 09 marks within six months.
ASI Israr Hussain No. 721/P	IR Swami District	Recommended for promision Conditionally. He shall qualify Mandatory Training/Courses as our Police Rules 19-25A, earning 05 marks within siz months.
ASE Putalitar No. 592/HR	-Oransadda-Oiseric:-	Recommended for promotion Conditionally. He shall qualify Handatory Training/Courses as per Police Rules 19-25A, earning 06 marks within six months.
ASI Abid Ullan No. 593/MR	Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as

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tionally. He shall qualify Handstory Training/Courses Ruic 19-25/ ening 05 100 · · · ·

Recommended for promotion Condition He shall qualify Mendatory Training/Cours per Police Rules 19-25A, parting 081 litionally. . 08¹ merks

Recommended for promotion Conditionally: He shat qualify Mandatory Training Correct as per Police Rules 19-25A, carning CO7 marks within six months. dda District Recommended for promotion Conditionally.

Recommenced for promotion Conditionally. Subject to production of satisfactory ACR for the year 2017 within 15 days. He shall quality Handatory Training/Courses as per Police Rules 19-25A, earning 05 marks within sik months.

commended for promotion Conditionally. He shall qualify Handatory Training/Courses as per Poice Rules 19-25A; earning 02: marks within six months.

Recommended for promotion Conditionally Subject to production of satisfactory ACR for the year 2016 within 15 days. He shall quality Mandatory Training/Courses as per police Rules 19-25A, earning 08 marks within the months of a

Recommanded for promotion Conditionally He shall qualify Nandatory Training/Courses as per Posce Rules 19-25A, conting 06 meres within six months.

Recommended for promotion Conditionally, Subject to production of satisfoctory ACR for the year 2017 within 15 days. He shall qualify Mandalory Training/Courses as per Police Rules. 19-25A, narning 09 marks within six months.

Recommended for promotion Conditionally. Subject to production of satisfectory ACRs for the year 2014 & 2015 mitten 15 days He shall oundry Mandetory Training/Courses as Police Police 19-254, carving 07 marks w OF the encenting

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AST Raz Huhammad No.

ASI Fazat Khuda No. 594/MR

ASI Falak Niez Do. 595/HR

ASLADIC AH NO. 642/MR

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AST Hulehid No. 722/MR

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ASESArtaj Khan Ho. S97/HR

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59.	ASI Basar No. 659/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 09 marks wi six months.
. <u>6</u> 0.	ASI Iflikhar Ahmad No. 719/MR	On deputation to CCP/Peshawar from Swabi District	Recommended for promotion Conditiona He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 08 marks wi six months.
61.	ASI Rab Nawa No. 589/MR	Swabi District	Recommended for promotion Conditional Ne shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 05 marks with six months.
62.	ASI Rashid Ali No. 590/MR	Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 08 marks with six months.
63.	ASI Intezar Ali No. 591/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 09 marks wi six months.
64.	ASI Israr Hussain No. 721/MR	Swabi District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 05 marks with six months.
65.	ASI Muzaffar No. 592/MR '	Charsadda District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 06 marks with six months.
66.	ASI Abid Ullah No. 593/MR	Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 05 marks will six months.
67.	ASI Raz Muhammad No. 660/MR	Swabi District	Recommended for promotion Conditiona He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 08 marks will six months.
68,	ASI Fazał Khuda No. 594/MR	Charsadda District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 07 marks wit six months.
69.	ASI Falak Niaz No. 595/MR	Charsadda District	Recommended for promotion Conditional Subject to production of satisfactory ACR for t year 2017 within 15 days. He shall qual Mandalory Training/Courses as per Police Rul 19-25A, earning 05 marks within six months.
70.	ASI Abid Ali No. 642/MR	. On deputation to Special Branch from Mardan District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses per Police Rules 19-25A, earning 02 marks with six months.
71.	ASI Muhammad Ilyas No. 596/MR	Swabi District	Recommended for promotion Conditional Subject to production of satisfactory ACR for ti year 2016 within 15 days. He shall qual Mandatory Training/Courses as per Police Rul 19-25A, earning 08 marks within six months.
72.	ASI Mujahid No. 722/MR	Charsadda District	Recommended for promotion Conditional He shall qualify Mandatory Training/Courses a per Police Rules 19-25A, earning 08 marks with six months.
73.	ASI Sartaj Khan No. 597/MR	Mardan District	Recommended for promotion Conditionall Subject to production of satisfactory ACR for th year 2017 within 15 days. He shall quali Mandatory Training/Courses as per Police Rule 19-25A, earning 09 marks within six months.
74.	ASI Maneer Khan No. 714/MR	Mardan District	Recommended for promotion Conditionall Subject to production of satisfactory ACR for th year 2014 & 2015 within 15 days. He shall quali Mandatory Training/Courses as per Police Rule 19-25A, earning 07 marks within six-months.

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(76.)	ASE Jamabed Khao No. 555/NR	Harden District	Recommended for promotion Conditionality. He shall qualify Handatory Training/Courses as Ser Police Rules 19-25A, earning 04 merics within six months.
77.	ASI Lugman Flien ho. 600/HB	Swagi District	Recommended for premotion Conditionality. He shall qualify Nandatory Training/Courses as per Police Rules 19-25A, earning 02 marks within six mentits:
78	ASI Fazzi Subhan Ro. 601/NR	Sarabi Distinct	Recommanded for premotion Conditionally, He shall qualify Hendebry Training/Courses as per Police Rules 19-25A, earning OB, marks within size months
(-75.÷	ASI Jahangur Ha. 723/HR	Chargedde District	Recommended for promotion Conditionally. It he shall quelty Handstory Training/Courses as Der Polee Rules 19-25A, earning Q.S. martin adhin six months.
.80.	ASS Charantar Mahanood No.	Marcian District	Accommended for promotion Conditionally. He shall quality Handatory Treising/Courses as ber Police Rules 19-25A, carring 01 merk within six months.
-81,	ASI Junet Al No: SOJYHR		Recommended for promotion Conditionally, He shall quality Mandatory Training/Courses an jer Police. Rules 19-25A, earning 05-marks within six months.
182.9 1.7	ASI Sync (LEAF Hussen No.	Snabl District	Recommended for promotion Conditionally, He shall quality Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
	ASI, Noab Ud Die No. 605/HR		Recommended for promotion Conditionally. He shall qualify Handatory Training/Courses as per Police Rules 13-25A earling Offsmarter within ste months.
		Mardon District	Recommanded for presention Conditionally, He shall thatfy Handstory Training/Courses as, Der Polce Rules 19-25A; corning 00, marks; An mithin six mentos.

Necessary Gazette Notification be issued accordingly

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(Muhammad Ali Khan)PSP Regional Police Officer Mardan

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75.	ASI Hussain Ali No. 598/MR	Mardan District	Recommended for plomotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
76.	ASI Jamshed Khan No. 599/MR	Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 04 marks within six months.
. 77.	ASI Luqman Khan No. 600/MR	Swabi District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 02 marks within six months.
78.	ASI Fazal Subhan No. 601/MR	Swabi District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A; earning 08 marks within six months.
⁷ 9.	ASI Jehangir No. 723/MR	Charsadda District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 05 marks within six months.
80.	ASI Ghazanfar Mahmood No. 602/MR	Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 01 mark within six months.
81.	ASI Jehad Ali No. 603/MR	Swabl District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 05 marks within six months.
82.	ASI Syed Illaf Hussain No. 604/MR	Swabl District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 07 marks within six months.
83.	ASI NIqab Ud Din No. 605/MR	Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 08 marks within six months.
8 4.	ASI Abdul Jabbar No. 606/MR	Mardan District	Recommended for promotion Conditionally. He shall qualify Mandatory Training/Courses as per Police Rules 19-25A, earning 09 marks within six months.

Necessary Gazette Notification be issued accordingly.

Sd/-(Muhammad Ali Khan) PSP Regional Police Officer, Mardan.

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vacancies and in order of seniority

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Hence, the afcrementioned recommendations were thoroughly ofscussed in the Departmental Promotion Committee Meeting held in this office on 01.02.2023 and the committee ibid unanimously agreed with the said recommendations.

Keeping in view the above, the promotions of the following Police Officers who got promoted as Officiating Sub Inspectors in the Departmental Promotion Committee vide its meetings held on 22.03.2018, 20.06.2018 and 22.01.2019, therefore, their promotions are hereby termed as adhoc promotions except Police Officers namely Mehboob Khan No. 45/MR, Wali Muhammad No. 519/MR and Aziz Ur Rehman No. 646/MR As according to this office record, at the time of Departmental Promotion Committee meeting vide date 22.03.2018, 03 vacancies in the rank of Sub Inspector were lying vacant against 75% share.

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38	Humair Hussain No. 305/MR	Marcan Øistrict)
35.	Bismillah Jan No 312/VR	Swabi District	/
37	Hidayat Ullah Nc. 306/MR	Charsadda District	
	Shabbir Ahmad No. 315/MR	Marcan District	
<u>. 38.</u> 39.	Zanid Nawaz No. 307/MR	! Swabi District	
. 40.	Altal Hussain No. 314/MR	Swabl District	i
41	Baidar Bakht No. 311/MR	Charsadda District	
	Kareen Khan No. 554/MR	¹ Mardan District	
42.	Imtiaz Khan Nc. 555/MR	Mardan District	
43.	Khan Muhammad No. 557/MR	Swabi District	
44.	Faroog Hussein No. 558/MR	Mardan District	
45.	Qesim Khar. No. 559/MR	Swabi District	i
47	Noorul Islam No. 560/MR	Mardan District	
48.	Javid Ahmad No. 711/MR	Mardan District	
49.	Anees Ahmad No. 561/MR	Mardán District	- <u>-</u> i
50.	Saif Ul Islam No. 562/MR	Mardan District	
	Umer Hayet No. 563/MR	Swabi District	
51.	Akhtar Munir No. 564/MR	Swabi District	
53.	Shah Jehan No. 712/MR	Mardan District	<u> </u>
53	Gul Ma'ik No. 565/MR	Charsadda District	
55.	Hamayun No. 651/MR	Mardan District	-
<u>55.</u> δ6.	Ifikhar Shah No. 566/MR	Swabi District	
57.	Aziz Ur Rahman No: 582/MR	Merdan District	
58.	Syed Saleem Nawaz No. 662/MR	Mardan District	-
.59.	Ayaz Muhammad No. 653/MR	Swabi District	
£0.	Niaz Ali No. 5: .MR	Mardan District	1.10
	Abdul Salam 568/MR		
61	lavid Ma cac		
<u> </u>	Javid No. 565 R	Mardan District	FETEN
62.	Jehangir Khar, Jo. 570/MR	Mardan District	ESTED
<u>62.</u> 63.	Jehangir Khar, Jo. 570/MR Muhammad Zubair No. 654/MR	Mardan District AT Mardan District Swabi District	ESTED
62. 63. 64.	Jehangir Khar, Jo. 570/MR Muhammad Zupair No. 654/MR Parwar Ali No. 571/MR	Mardan District Mardan District Swabi District Mardan District	ESTED
62. 63. 64. 65.	Jehangir Khar, Io. 570/MR Muhammad Zubair No. 654/MR Parwar Ali No. 571/MR Shah Hussair, No. 572/MR	Mardan District Mardan District Swabi District Mardan District Swabi District	ESTED
62. 63. 64. 65. 56.	Jehangir Khan, Jo. 570/MR Muhammad Zubair No. 654/MR Parwar Ali No. 571/MR Shah Hussair: No. 572/MR Shahi Mulk No. 655/MR	Mardan District Mardan District Swabi District Mardan District Swabi District Swabi District	ESTED
62. 63. 64. 65. 56. 67.	Jehangir Khan, Jo. 570/MR Muhammad Zubair No. 654/MR Parwar Ali No. 571/MR Shah Hussair: No. 572/MR Shahi Mulk No. 655/MR Iltaf Hussain No. 573/MR	Mardan District Mardan District Swabi District Mardan District Swabi District Swabi District Mardan District	ESTED
62. 63. 64. 65. 56. 67. 68.	Jehangir Khan, Jo. 570/MR Muhammad Zubair No. 654/MR Parwar Ali No. 571/MR Shah Hussair: No. 572/MR Shahi Mulk No. 655/MR Iltaf Hussain No. 573/MR Janab Ali No. 574/MR	Mardan District Mardan District Swabi District Mardan District Swabi District Swabi District Mardan District Swabi District	ESTED
62. 63. 64. 65. 56. 67. 68.	Jehangir Khar, Jo. 570/MR Muhammad Zubair No. 654/MR Parwar Ali No. 571/MR Shah Hussair: No. 572/MR Shahi Mulk No. 655/MR Iltaf Hussain No. 573/MR Janab Ali No. 574/MR Zuffigar No. 575/MR	Mardan District Mardan District Swabi District Mardan District Swabi District Swabi District Mardan District Swabi District Mardan District Mardan District	ESTED
62. 63. 64. 56. 56. 67. 68. 69. 70. 71.	Jehangir Khar, Jo. 570/MR Muhammad Zubair No. 654/MR Parwar Ali No. 571/MR Shah Hussair: No. 572/MR Shahi Mulk No. 655/MR Iltaf Hussain No. 573/MR Janab Ali No. 574/MR Zuffigar No. 575/MR Shahab Ali No. 576/MR	Mardan District Mardan District Swabi District Swabi District Swabi District Swabi District Mardan District Swabi District Mardan District Mardan District Swabi District	ESTED
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91.		Charsadca District
92.	Abid Ullah No. 593/MR	Marcan District
93.	Raz Muhammad No. 360/MR	Swabi District
94.	Fazal Khuda No. 594/MR	Charsadda Districi
95.	Falak Niaz No. 595/MR	Charsadda District
96.	Abid All No. 642/MR	: Mardan District
97.	Muhammad ILyas No. 596/MR	Swabi District
98.	Mujahid No. 722/MR	Charsadda District
<u>99.</u>	Sartal Khan No. 597/MR	Marcian District
100.	Maneer Khan No. 714/MR	Mardan District
101.	Hussain All No. 598/MR	Mardan District
	Jamshed Khan No. 599/MR	Mardan District
103.	Lugman Khan No. 600/MR /	Swabi District
:04.	Fazal Subhan No. 601/MR	Swabi District
<u> </u>	Jehangir No. 723/MR	Charsadoa District
106.	Ghazanfar Mahmood No. 602/MR	Mardan Cistrict
107.	Jehad All No. 603/MR	Swabi District
108.	Syed ILtaf Hussalr, No. 604/MR	Swabi District
.93	Nigab Ud Din No. 605/MR	Mardan District
110	Abdul Jabbar No. 606/MR	Mardan District

Moreover, upon creation of vacancy under 75% share, the adhoc promotions in the rank of Sub inspectors will be considered as regularized Officiating Sub inspectors as per order of seniority, from date of creation of vacancy.

It is pertinent to mention here that after promotion as Officiating Subinspector; their cases for confirmation will be dealt as per Police Rules, 1934 Chapter-13 Rule-18, on the basis of regulate criteria already fulfilled during the period of their adhoc promotion.

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

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Subject:

Memo:

GOVERNMENT OF KHYBER PAKHTUNKHWA. OFFICE OF THE REGIONAL POLICE OFFICER. MARDAN Phone No. 0937-9230113, Fax No.0937-9230115.

Email: esrpomardan@gmail.com

All District Police Officers. in Mardan Region.

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/ O , February, 2023.

REVISED PROMOTION IN THE RANK OFFICIATING SUB

In continuation to this office Memo: No. 783-87/ES dated 10 02 2022 on the subject noted above.

Upon creation of vacancy under 75% share, the achoc promotions in the rank of Sub Inspectors of the following Police Officers of this Region are hereby regularized as Officiating Sub Inspectors from date mentioned against each.

Moreover, the case of the below mentioned Police Officers for confirmation will be dealt as per Police Rules, 1934 Chapter-13 Rule-18, on the basis of requisite criteria if already fulfilled during the period of their adhoc promotion.

S. No.	Aamo and Number	, Home District	Date of Promotion as Offg: Sub Inspector
2	Saehen Sheh No.641/MR	Mardan District	14.04.2018
3	Rabrawaz No. 528/MR	Swabi District	24.04.2018
1 4.	Monamanday Nc. 528/MR	Mardar District	27.07.2018
5.	Akhtar Hussain No. 547/MR	Mardan District	30.07.2018
<u> </u>	Abdul Wahab No.530/MR	Novishera District	29.10.2018
7. 1	Hashmat Khan No. 531/MR	: Swabi District	21.02.2019
18.	Syed Niser Ahmad No.532/MR	Mardan District	28.02.2019
9.	Abdul Ghaffar No: 533/MR	Swebi District	03.04.2019
10	Nasir Khan No. 535/MR	Mardan District	15.04.2019
11.	Yaseen Shah No. 637/MR	Mardan District	20.04.2019
12,	Amjad Ali No.538/MR	Mardan District	24.04,2019
13.	Naeem Khan No. 510/Jup	Swabi District	15.06.2019
· 14. ·::	Jehandad No. 540/MR	Mardan District	05.07.2019
15	Manzoor Ali Shah No. 410/MR	Marian District	31.07.2019
13	Mukt tiar Ali No. 543/MR	Mardan District	14.10.2019
17	Zied Muhammad No. 536/MR	Nowshera District	31.12.2019
15.	Muhammad Jehzngir No. 648/MR	Mardan District	31.01.2020
19.		Mardan District	03.02.2020
1 20.		Mardan District	09.02.2020
21		Swabi District	09.02.2020
	-azai Huasain No. 545a.	Mandan District	1 31.03.2020 1 31.03.2520
23	Raza Khan No. 546/MR	- Svieb District	00.00
		Swab District	08.04.2020

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24	Muhammad Naeem No. 547/MR	Swabi Distric:	30.04.2020
25.	Atta Ur Rahman Nc. 548/MR	Marcan District	19.05.2020
26	Saicy Amin No. 649/MR	Swabi District	02.05.2020
37	All Akbar No. 550 MR	Marcan District	30.05.2020
: 28.	Fazar Dawood No. 551/MR	Marcan District	31.07.2020
. 25.	Fazal Khaliq No. 552 MR	Marcan District	01.03.2020
- 3C.	Harocn Khan No. 173/MR	Swabi District	01,05.2020
- 31.	Syed Bahramand Shah No. 3C9/MR	Charsaoda Distr ci	02.03.2020
32.	Ana Ulah No. 310/MR	Swabi Distric:	11.03.2020
- 33.	1 Sadique Akbar No. 3C8/MR	Swabi Distric:	02.09.2020
34.	Humair Hussain No. 305/MR	Mardan District	28.09.2020
35.	B smillah Jan No. 312/MR	1 Swabi District	30.09.2020
36.	Hideyst Ulah No. 306/MR	Charsadda District	15.10.2020
. 37.	Snabbir Ahmac No. 315/MR	Mardan District	26.11.2020
38.	Zahid Nawaz No. 3C7/MR	Swabl District	01.01.2021
39.	A taf Hussain No. 314/MR	Swabi District	10.01.2021
.	Baidar Baxht No. 311/MR	Charsadda District	12.04.2021
41	Kameen Khan No: 554/MR	Mardan District	12.04.2021
42	Imtiaz Khan Nc. 555/MR	Mardan District	29.08.2021
43	Khan Muhammad No. 557/MR	Swabl District	03.09.2021
44	Qasim Khan No. 559/MR	Swabl District	11.03.2022
<u> </u>	Noorul Islam No. 560/MR	Mardan District	01.04.2022
46.	Javid Ahmad No. 711/MR	Mardan District	02.04.2022
-27	Anees Ahmad No. 561/MR	Mardan District	
- 28.	Saif Ul Islam No. 582/MR	Mardan District	31.10.2022
a the contract of the			05.01.2023

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

Before the Provincial Police Officer Khyber Pakhtunkhwa Peshawar.

Anex

DIary NO 4942/CPE

Dated 27/02/2023

Ide

Departmental appeal against the order issued vide Letter No; 783-87/ES dated 10-02-2023 whereby the officiating promotion order of the appellant has been termed as adhoc promotion.

Respectfully Submitted:-

1. That the appellant was initially enlisted as Constable in Police department on 17-07-1995, was promoted as Head Constable in the year 2009, was then promoted as ASI in the year 2014 and after being confirmed as ASI was lastly promoted as Officiating Sub Inspector in the year 2019. During service the appellant qualified various courses including Lower School Course, Intermediate and Upper School Course and is presently serving in police department of Mardan Region. The appellant along with others was confirmed as ASI on list "E" of Mardan Region, upon the recommendations of departmental promotion committee in its meeting held on 22-11-2019 and was accordingly promoted along with others as Officiating Sub Inspectors (BPS 14) vide Letter/Order dated 11-02-2019 by the Regional Police Officer Mardan. (Copy of Letter/Order dated 22-11-2019 is enclosed as annexure A).

2. That the appellant since enlistment performed his duties with honesty and full devotion and to entire satisfaction of his high ups.

3. That strangely the promotion order of the appellant was termed as adhoc promotion vide Letter/Order issued vide NO 783-87/ES dated 10-02-2023, without assigning any valid/legal reason by the Regional Police Officer Mardan. (Copy of Letter dated 10-02-2023 is enclosed as annexure B). 4. That subsequently vide Letter/Order issued vide No 793-97/ES dated 10-02-2023, forty eight of the stated adhoc promotees were regularized as Officiating Sub Inspectors from various dates. (Copy of the Letter No 793-97/ES dated 10-02-2023 is enclosed as annexure C).

5. That the impugned Letter/Order issued vide No 483-87/ES dated 10-02-2023 to the extent of appellant is against the law, facts and principles of justice.

6. That the impugned order is illegal and void ab-initio being passed ex parte, the appellant has been condemned unheard.

7. That the impugned order is against the principles of natural justice besides in violation of Article 4, 10 and 25 of the Constitution of Pakistan. There is no omission or commission on part of the appellant. No Charge Sheet and Show Cause Notice were issued to the appellant, nor any regular inquiry was conducted in the matter. The appellant was promoted after due process of law besides upon the recommendation of departmental promotion committee, as such vested rights had accrued in favor of the appellant from which he cannot be deprived.

8. That the appellant even completed his Pole "A" and Pole :B" period besides various courses, required for confirmation as Sub Inspector, as such was hopeful of his confirmation as Sub Inspector but shockingly the impugned order was passed in violation of law and rules.

9. That the appellant was entitled for confirmation as SI after rendering two year service as officiating SI but his officiating promotion was even termed as adhoc.

10. That the appellant was promoted as officiating SI against the vacant valid vacancy.

Other,

11. That even there is no eligible candidate in Fast Track quota, as in the year 2022/2023 eleven candidates had applied for promotion in Fast Track quota, of whom six candidates did not appear in exam while the rest five remained unsuccessful in exam, thus too the impugned order is liable to be set at naught.

It is therefore requested that on acceptance of this appeal, the impugned Letter/Order issued vide No 783-87/ES dated 10-02-2023 to the extent of the appellant may kindly be set aside thereby restoring his officiating promotion order dated 11-02-2019, with all benefits.

> Rabnawaz Khan Ali, Officiating Sub Inspector No 589/MR, OII PS Garhi Kapura Mardan

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CHAPTER XIII --- PROMOTIONS

(3) Superintendents shall submit annually to the Deputy Inspector-Generating n_{\pm} 15th January confidential reports in form 13.17-A' on the working of all gazetted officers $\frac{1}{2\pi n_{\pm}}$ under them. Deputy Inspector-General will add their own remarks and forward the reports to $\frac{1}{2\pi n_{\pm}}$ the Inspector-General, on or before the 15th February.

The gist of adverse reports shall be communicated in written to the officers concerned is ubject to the conditions specified in paragraph 7 of Punjab Government Consolidated Circular hy .1 and their acknowledgment shall be taken and attached to their personal files.

(4) The names and designation of the officers writing reports shall invariably by typed or written in block letters below their signatures.

(5) Reporting officers shall comment generally on the way in which the officer has carried out his various duties during the year and shall give an estimate of his personality, character and abilities, including detective powers and ability to conduct prosecutions. The report shall contain an opinion on any point specially required at any particular time, e.g. fitness to pass an efficiency bar. Particular mention shall be made of the officer's relations with his fellow officers and general public and his honestly.

Comments

Annual Conlidential Report. Adverse remarks-Object of conveying adverse remarks to individual Officer explained-Un-conveyed adverse remarks in a Confidential Report are to be ignored for purposes of promotion and also for purposes of retirement.

-Annual Confidential Report. Action on basis bl. Consecutive reports on integrity as "cannot be vouched" "doubtful" and "controversial"-Reports categorised as "B" and, not as "C" Action taken on such reports, held, not valid according to Rules."

-Reversion from officiating promotion and removal from list "D'.'-Head Constable appointed as Officiating Assistant Sub-Inspector-Not found fit to hold such rank due to uneven service record-Reverted but kept on list "C" and given chance to improve his work and conduct' by placing him under special report-Subsequently also reported to have doubtful integrity and censured-Reversion as Head Constable and removal from list "D" in circumstances, held, perfectly justified-Appeal dismissed by Service Tribunal-Punjab Service Tribunals Act (IX of 1974), S. 4.3

13.18. Probationary period of promotion.— All Police Officers promoted in rank shall be on probation for two years; provided that the appointing authority may, be a special order in each case, permit periods of officiating service to count towards the period of probation. On the conclusion of the probationary period a report shall be rendered to the authority empowered to confirm the promotion who shall either confirm the officer or revert him. In no case shall be period

1988 PLC(CS) 685 1981 PLC(CS) 748 1983 PLC(CS) 631

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CHAPTER XHI - PROMOTIONS

probation be extended beyond two years and the confirming authority must arrive at a definite decision within that period whether the officer should be confirmed or reverted. While on probation officers may be reverted without departmental proceedings. Such reversion shall not be considered reduction for the purposes of rule 16.4.

This rule shall not apply to constables and Sub-Inspectors promoted to the selection grade, whose case is governed by rules 13.5 and 13.4.

Comments

Civil servant had challenged out of turn promotion granted to opposing civil servant by Service Tribunal. Service Tribunal, on appeal filed by opposing civil servant, taking into consideration his satisfactory service record and award of cash and commendation certificates by Authorities, granted him out of turn promotion. Service Tribunal had rightly granted relief prayed for by opposing civil servant on principle of consistency. Judgment of Service Tribunal not suffering from any defect in law, could not be interfered with. No question of law of public importance being involved to warrant interference, under Art. 212(3) of Constitution of Pakistan (1973), petition filed by civil servant which otherwise was barred by time was dismissed.¹

Order of probation, cancellation of-Held, and competent authority under Rules is vested with powers to cancel order of probation after giving reasons.²

Tribuhal had set aside orders passed by Authority relusing to confirm appellant/civil servant as "Inspector" from date of his promotion with a direction to consider his case in terms of 0.13.18 of Punjab Police Rules, 1934, but orders/judgments of Service Tribunal we're frustrated by the Authority. Orders judgments of Service Tribunal were not challenged by Authority before Supreme Court. Service Tribunal being appellate forum for aggrieved civil servants and being substituite for High Court vide Art. 212 of Constitution of Pakistan (1973), its judgments/orders must receive consideration and respect and Authority was bound to comply with same in its true perspective.³

Civil servant had challenged out of turn promotion granted to opposing civil servant by Service Tribunal. Service Tribunal., on appeal filed by opposing civil servant, taking into consideration his satisfactory service record and award of cash and commendation certificates by Authorities, granted him out of turn promotion. Service Tribunal had rightly granted relief prayed for by opposing civil servant on principle of consistency. Judgment of Service Tribunal not suffering from any defect in law, could not be interfered with. No question of law of public importance being involved to warrant interference, under Art. 212(3) of Constitution of Pakistan (1973), petition filed by civil servant which otherwise was barred by time was dismissed.⁴

 1.1
 1999 PLC(CS) 1381

 2.1
 1984 PLC(CS) 625

 3.
 2000 PLC(CS) 697

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 1999 SCMR 1594

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No.

Subject

Menno: j

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

1839.941 Legal dated the

The Regional Police Officer, Banou.

GUIDELINES REGARDING CONFIRMATION IN THE RASE OF ASLAND SI

Please refer to the subject cited above.

CRO Peshawar vide letter No. CPO/CPB/63 dated 13.02.2023 had enveyed with eght that ASIs promoted from a lower rank shall be confirmed on the termination of 0.3 years of parter period with immediate effect i.e. on the date his probation period actually completes and not tresselve to of, officiating promotion as ASI in the light of Rule 13.18 of Police Rules, 1934. Similarly CPO/CPB/64 dated 13.02.2023, it has been conveyed that Assistant Sub trippertors apported to the (PASIs) shall be confirmed in their appointments on the termination of three years probationary prowith immediate effect, not with retrospective effect that is from the date of their appointments by Range Deputy Inspector General of Police in the spirit of Rules 12.18 and Rules 19.25(5) of Police Rule. 1934.

In this regard, the Hon'ble Supreme Court of Pakistan vide its Judgment in Martin Warraich case Vs IGP Punjab (PLD 1985 SC 159), has underlined the difference between the date appointment and date of confirmation and has further held that the final seniority of the Officers and reckoned from the date of confirmation of the Officers, not from the date of appointment.

Moreover, CPO Peshawar letter No. CPO/CPB/68 dated 28.02.2022 is also in field which directions were issued to all regions? unit heads of Khyber Pakhtunkhwa Police regard confirmation in the light of Rule 13.18 of Police Rules, 1934.

Therefore, instructions contained in the above letters may be followed in letter and spiral please,

(SABIR AHMAD)

Additional Inspector General of Police. Headquarters, Khyber Pakhtunkhwa. Peshawar.

Olfer

PSO to W/ IGP, Khyber Pakhtunkhwa, Peshawar, PA to DIG/ HQrs: Khyber Pakhtunkhwa, Peshawar, Incharge, CP Branch, CPO, Peshawar,

OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA

CLEAR

No. 1638-41/Legal

dated the 05-05-2023.

To

The Regional Police Officer. Bannu.

Subject: GUIDELINES REGARDING CONFIRMATION IN THE RANK OF ASLAND SI.

Memo

Please refer to the subject cited above.

CPO Peshawar vide letter No. CPO/CPB(63 dated 13 02.2023 had conveyed to all regions That ASIs promoted from a lower rank shall be confirmed on the termination of 1 year of motion period with immediate effect i.e on the date his probation period actually completes and not from the vide of officiating promotion at ASI in the light of Rule 13.18 of Police Rules, 1934) similarly Vide CPO/CPE/64 dated 13.02.2003, it has been conveyed that Assistant Sub Inspector appointed (PAS) shall be confirmed in their appointments on the termination of three years probationary period with date effect, not with retrospective effect that is from the date of their appointments by the Range Deputy Inspector General of Police in the spirit of Rules 12.18 and Rules 19:25(5) of police Rules 1934

In this regard, the Hon'ble Supreme Court of Pakistan vide it judgment and Mushtaq Warraich case Vs IGP Punjab (PLD 1985 SC 159), he underlined the difference between the date of appointed and date of confirmation and has further held that the final seniority of the Office of reckoned from the date of confirmation of the Officers, not from the date of appointment.

Moreover, CPD Peshawar letter No CPO CPB/68 dated 28 02 2022 als d directions were issued to all regions unit heads of Khyber Pakhtunkhwa Police regarding conformation in the light of Rule 13.18 of Police Rules, 1934

Therefore, instructions contained it the above letters may be followed better and spirit, please.

(SABIR AHMAD) ^{PSP} Additional Inspector General of Police Headquarters, Khyber Pakhtunkhwa, Peshawar.

- PSO to W/IGP, Khyber Pakhtunkhwa, Peshawar.
- PA to DIG/HQr: Khyber Pakhtunkhwa, Peshawar.
- Incharge, CP Branch, CPO, Peshawar.

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VAKALATNAMA

IN THE SERVICE TRIBUNAL KRYBER PAKHTUNKHWA PESHAWAR

Reb nugen 2 141 cm Petitioner/Appellant. VERSUS

We the undersigned, do hereby appoint and constitute,

2.

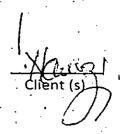
by me on

BASEER AHMED SHAH Advocate To act, appear and plead in the above-mentioned matter and to withdraw or compromise the said matter or submit to arbitration any differences or dispute that shall arise touching or in any manner relating to the said matter and to receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said matter.

. To draft and sign files at necessary pleadings, applications, objections, affidavits or other documents as shall be deemed necessary and advisable for the prosecution of the said matter at all its stages.

To employ any other Legal Practitioner, authorizing him to exercise the power as conferred on the undersigned Advocate, wherever he may think fit to do so.

AND we hereby agree to ratify whatever the Advocate or his substitute shall do in the above matter. I/We also hereby agree not to hold the Advocate or his substitute responsible for the result of the said matter in consequence of his absence from the Court when the said matter is called up for hearing. I/We further hereby agree that in the event for the whole or any part of the fee to be paid to the Advocate remaining unpaid, he shall be entitled to withdraw from the above matter. Received



BASEER AHMED SHAH

IBAD UR REHMAN KHALIL Advocates Peshawar

OFFICE:-Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell # 0320-1946985 Email: ahmedbaseer234@gmail.com