



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA

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Annex "O"

SENIORITY LIST OF DSsP EXECUTIVE BS-17 OF KHYBER PAKHTUNKHWA POLICE

No./CPO/E-I/Seniority List/ 848 , The Seniority List of Deputy Superintendent of Police (DSP Executive BS-17) of Khyber Pakhtunkhwa Police is hereby published for information to all concerned. Dated: 29/03/2023

Sr. No.	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O. Promotion as DSP	Remarks
1.	Mr. Aamir Shahzad	09.08.1968	Peshawar	30.01.1996	30.01.1998	30.06.2011	
2.	Mr. Waqar Ahmad	03.01.1968	Nowshera	01.04.1997	01.04.1999	19.03.2012	Notification bearing No. 594/E-I, dated 16.03.2023 regarding repatriation of Police Officer to their parent Provinces/Departments suspended by Peshawar High Court Mingora Bench vide Writ Petition No. 1163-P/2023, dated 28.03.2023.
3.	Mr. Gul Naseeb	09.11.1968	Bannu	01.10.1997	01.10.1999	19.03.2012	
4.	Mr. Amir Muhammad Khan	07.01.1970	Buner	14.10.1997	14.10.1999	19.03.2012	
5.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	26.05.1987	20.06.2000	25.03.2013	Notification bearing No. 594/E-I, dated 16.03.2023 regarding repatriation of Police Officer to their parent Provinces/Departments suspended by Peshawar High Court Mingora Bench vide Writ Petition No. 1163-P/2023, dated 28.03.2023.
6.	Mr. Asad Mehmood	08.03.1968	Swabi		07.09.2000	24.10.2014	Notification bearing No. 594/E-I, dated 16.03.2023 regarding repatriation of Police Officer to their parent Provinces/Departments suspended by Peshawar High Court Mingora Bench vide Writ Petition No. 1163-P/2023, dated 28.03.2023.
7.	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	26.04.2000	26.04.2002	08.04.2016	
8.	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	29.01.2001	29.01.2003	19.07.2013	Notification bearing No. 594/E-I, dated 16.03.2023 regarding repatriation of Police Officer to their parent Provinces/Departments suspended by Peshawar High Court Mingora Bench vide Writ Petition No. 1163-P/2023, dated 28.03.2023.
9.	Mr. Niaz Gul	07.03.1971	Abbottabad	17.11.2001	17.11.2003	24.01.2014	



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10.	Mr. Salah-ud-Din	15.01.1970	Tank	24.01.2002	24.01.2004	07.11.2012	
11.	Mr. Tauheed Khan	20.10.1963	DIKhan	25.01.2002	25.01.2004	19.03.2012	
12.	Mr. Murad Ali	09.01.1973	Bannu	30.09.2000	30.09.2002	02.04.2015	
13.	Mr. Ali Gohar	23.03.1968	K. Agency	13.01.2003	13.01.2005	02.04.2015	
14.	Mr. Waqar Ahmad	12.04.1974	Charsadda	01.05.2003	01.05.2005	02.04.2015	
15.	Mr. Abdus Salam Khalid	24.06.1976	Lakki	01.05.2003	01.05.2005	25.03.2016	
16.	Mr. Sajjad Hussain	23.03.1976	Nowshera	23.06.2003	23.06.2005	02.04.2015	
17.	Mr. Muhammad Tahir Shah	01.03.1972	Bannu	24.07.2003	24.07.2005	24.01.2014	
18.	Mr. Safdar Khan	30.04.1971	Kohat	29.08.2003	29.08.2005	02.04.2015	
19.	Mr. Hidayat Ullah Shah	20.04.1965	Swabi	20.12.2003	20.12.2005	25.03.2016	
20.	Mr. Shakeel Ahmad	14.04.1969	Charsadda	20.12.2003	20.12.2005	12.09.2014	
21.	Mr. Khan, Khel	10.04.1969	Mardan	20.12.2003	20.12.2005	24.01.2014	
22.	Mr. Muhammad Saeed	04.05.1969	Mardan	20.12.2003	20.12.2005	12.09.2014	
23.	Mr. Rasheed Iqbal	15.01.1974	Mardan	20.12.2003	20.12.2005	25.03.2016	
24.	Mr. Muhammad Fayaz	07.03.1974	Mardan	20.12.2003	20.12.2005	25.03.2016	
25.	Ms. Aneela Naz	09.10.1971	Peshawar	01.01.2004	01.01.2006	02.04.2015	
26.	Ms. Asmat Ara	15.04.1975	Swabi	01.01.2004	01.01.2006	02.04.2015	
27.	Mrs. Shazia Shahid	30.04.1976	Charsadda	01.01.2004	01.01.2006	02.04.2015	
28.	Mr. Mujeeb Ur Rehman	02.04.1969	Bannu	08.04.2004	08.04.2006	02.04.2015	
29.	Mr. Nisar Muhammad	20.01.1973	Lakki	17.04.2004	17.04.2006	24.01.2014	
30.	Mr. Mustafa Kamal Pasha	01.09.1969	Bannu	07.10.2004	07.10.2006	02.04.2015	
31.	Mr. Azmat Ali Khan	06.01.1970	Bannu	07.10.2004	07.10.2006	02.04.2015	
32.	Mr. Shabir Hussain Shah	15.06.1972	Lakki	07.10.2004	07.10.2006	18.08.2015	
33.	Arbab Shafiullah Jan	09.10.1966	Peshawar	22.11.2004	22.11.2006	02.01.2014	
34.	Mr. Rafiullah	12.03.1968	Peshawar	22.11.2004	22.11.2006	02.01.2014	
35.	Mr. Muhammad Atiq Shah	01.09.1978	Charsadda	22.11.2004	22.11.2006	06.02.2014	



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36.	Mr. Yasir Aman	11.08.1970	Peshawar	22.11.2004	22.11.2006	02.04.2015	
37.	Mr. Naseer Ali	03.10.1975	Charsadda	22.11.2004	22.11.2006	30.09.2016	
38.	Mr. Murad Ali	13.04.1965	Charsadda	22.11.2004	22.11.2006	15.11.2016	
39.	Mr. Muhammad Ilyas	01.04.1973	Mardan	07.12.2004	07.12.2006	18.08.2015	
40.	Mr. Arshad Khan	30.05.1974	Peshawar	08.12.2004	08.12.2006	07.03.2017	
41.	Mrs. Shahzadi Noshad	10.04.1972	Hangu	09.12.2004	09.12.2006	12.09.2014	
42.	Mr. Alamzeb	12.02.1980	Mardan	23.12.2004	23.12.2006	24.10.2014	
43.	Mr. Falak Nawaz	03.02.1969	Kohat	10.01.2005	10.01.2007	25.03.2016	
44.	Mr. Mazhar Jehan	12.12.1970	Kohat	10.01.2005	10.01.2007	24.08.2020	
45.	Mr. Asad Zubair	15.01.1980	Kohat	10.01.2005	10.01.2007	29.11.2018	
46.	Mrs. Rozia Altaf	30.07.1969	Peshawar	13.05.2005	13.05.2007	02.04.2015	
47.	Ms. Hamida Bano	04.12.1970	Peshawar	13.05.2005	13.05.2007	02.04.2015	
48.	Mr. Mehmood Nawaz	07.03.1974	Lakki	02.07.2005	02.07.2007	30.01.2018	
49.	Mr. Zahoor Ahmed	01.01.1980	Dir Lower	27.05.2006	27.05.2008	24.08.2020	
50.	Mr. Zafar Ahmad	10.01.1979	Chitral	27.05.2006	27.05.2008	30.01.2018	
51.	Mr. Farmanullah	27.10.1978	Dir Lower	27.05.2006	27.05.2008	30.01.2018	
52.	Mr. Wahid Ullah	01.04.1981	Dir Lower	27.05.2006	27.05.2008	24.08.2020	
53.	Mr. Ifikhar Ali Shah	11.05.1976	Bannu	25.08.2006	25.08.2008	15.11.2016	
54.	Mr. Zahid Khan	08.04.1967	Mkd. Agency	20.10.2007	20.10.2009	29.11.2018	Implementation of out of turn order No. 577/Legal/E-I, dated 15.03.2023 withheld under letter bearing Writ Petition No. 488-M/2022, dated 26.04.2022.
55.	Mr. Badshah Hazrat	15.02.1969	Dir Lower	20.10.2007	20.10.2009	29.11.2018	Implementation of out of turn order No. 575/Legal/E-I, dated 15.03.2023 withheld under letter bearing Writ Petition No. 488-M/2022, dated 26.04.2022.
56.	Mr. Naveed Iqbal	13.03.1981	Swat	20.10.2007	20.10.2009	29.11.2018	
57.	Mr. Ajmal Khan	15.05.1982	Mkd. Agency	20.10.2007	20.10.2009	16.05.2019	



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58.	Mr. Atiq-ur-Rehman	01.11.1981	Chitral	20.10.2007	20.10.2009	24.08.2020	
59.	Mr. Gul Shid Khan	01.06.1980	Charsadda	04.11.2007	04.11.2009	30.01.2018	
60.	Mr. Sher Rehman	05.04.1964	Mardan	03.04.2008	03.04.2010	15.11.2016	
61.	Mr. Jamil-ur-Rehman	16.04.1974	Abbottabad	07.01.2002		12.03.2018	Notification bearing No. 594/E-I, dated 16.03.2023 regarding repatriation of Police Officer to their parent Provinces/Departments suspended by Peshawar High Court vide Writ Petition No. 1164-P/2023, dated 28.03.2023
62.	Mr. Shah Nawaz	08.08.1965	Mansehra	08.04.2008	08.04.2010	30.09.2016	
63.	Mr. Fazal Wahid	01.12.1968	Mardan	19.04.2008	19.04.2010	29.11.2018	
64.	Mr. Muslim Khan	16.02.1970	Mardan	21.04.2008	21.04.2010	30.01.2018	
65.	Mr. Muhammad Saddique	16.11.1968	Abbottabad	21.04.2008	21.04.2010	30.01.2018	
66.	Mr. Faqir Hussain	02.02.1967	Peshawar	21.04.2008	21.04.2010	29.11.2018	
67.	Mr. Naseer Khan	01.04.1963	Charsadda	21.04.2008	21.04.2010	15.11.2016	
68.	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	01.06.2001	01.06.2003	25.03.2013	Seniority revised due to out of turn vide order No. 598/Lega/E-I, dated 16.03.2023
69.	Mr. Hukam Khan	14.03.1969	Charsadda	21.04.2008	21.04.2010	30.01.2018	
70.	Mr. Mehar Ali	01.01.1969	Nowshera	21.04.2008	21.04.2010	30.01.2018	
71.	Mr. Yar Nawab	05.11.1963	Mardan	21.04.2008	21.04.2010	30.01.2018	
72.	Mr. Ifikhar Ali	10.02.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018	
73.	Mr. Nasir Khan	22.11.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018	
74.	Mr. Hazrat Ullah	05.01.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018	
75.	Mr. Rokhan Zeb	07.04.1965	Swabi	18.04.2007	18.04.2009	25.03.2016	Seniority revised due to out of turn vide order No. 843/Lega/E-I, dated 29.03.2023
76.	Mr. Fazal Dad	16.03.1966	Charsadda	21.04.2008	21.04.2010	16.05.2019	
77.	Mr. Abdullah Jan	24.10.1963	Peshawar	21.04.2008	21.04.2010	18.02.2022	
78.	Mr. Liaqat Ali	08.04.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018	
79.	Mr. Asif Mehmood	25.04.1975	Bannu	04.07.2008	04.07.2010	18.02.2022	



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80.	Mr. Ghulam Sadiq	01.02.1968	Mkd: Agency	05.08.2008	05.08.2010	16.05.2019	Implementation of out of turn order No. 576/Legal/E-1, dated 15.03.2023 withheld under letter bearing Writ Petition No. 488-M/2022, dated 26.04.2022.
81.	Mr. Roshan Zeb	16.02.1964	Mardan	26.08.2008	26.08.2010	30.01.2018	
82.	Mr. Muhammad Javed	03.06.1963	Mansehra	26.04.2000	26.04.2002	27.10.2015	Seniority revised due to out of turn vide order No. 531/Legal/E-1, dated 14.03.2023
83.	Mr. Ibrar Khan	20.05.1970	Abbottabad	19.09.2008	19.09.2010	15.11.2016	
84.	Mr. Arshad Mehmood	15.08.1964	Mansehra	26.04.2000	26.04.2002	12.09.2014	Seniority revised due to out of turn vide order No. 530/Legal/E-1, dated 14.03.2023.
85.	Mr. Muhammad Hamayun	01.04.1963	Abbottabad	19.09.2008	19.09.2010	30.01.2018	
86.	Mr. Ijaz Ahmad	05.04.1963	Mansehra	26.04.2000	26.04.2002	12.09.2014	Seniority revised due to out of turn vide order No. 525/Legal/E-1, dated 14.03.2023
87.	Mr. Ghulam Muhammad	01.11.1963	Mansehra	19.09.2008	19.09.2010	30.01.2018	
88.	Mr. Ayaz Mehmood	20.02.1971	Mardan	30.12.2008	30.12.2010	30.01.2018	Notification bearing No. 719/Legal/E-1, dated 21.03.2023 regarding repatriation of Police Officer to their parent Provinces/Departments suspended by Peshawar High Court Mingora Bench vide Writ Petition No. 1163-P/2023, dated 28.03.2023.
89.	Mr. Asif Gohar	07.08.1964	Mansehra	26.04.2000	26.04.2002	20.01.2011	Seniority revised due to out of turn vide order No. 534/Legal/E-1, dated 14.03.2023
90.	Mr. Muhammad Akbar	14.05.1963	Mardan	11.08.2009	11.08.2011	18.02.2022	
91.	Mr. Zareef Khan	01.01.1969	Swabi	11.08.2009	11.08.2011	18.02.2022	
92.	Mr. Fazal Wahab	15.01.1965	Mardan	28.08.2009	28.08.2011	24.08.2020	
93.	Mr. Rahim Hussain	11.05.1970	Shangla	17.10.2002	17.10.2004	12.09.2014	Seniority revised due to out of turn vide order No. 532/Legal/E-1, dated 14.03.2023.
94.	Mr. Mehboob	16.12.1965	Abbottabad	19.09.2008	19.09.2010	07.03.2017	Seniority revised due to out of turn vide order No. 533/Legal/E-1, dated 14.03.2023.
95.	Mr. Muhammad Sohail	30.04.1977	Mansehra	28.08.2009	28.08.2011	19.04.2022	
96.	Mr. Alam Zeb	10.11.1963	Mardan	18.11.2009	18.11.2011	30.01.2018	
97.	Mr. Saeed Khan	15.04.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018	
98.	Mr. Muhammad Ishaq	21.12.1968	Nowshera	18.11.2009	18.11.2011	16.05.2019	
99.	Mr. Pasham Gul	29.04.1963	Mardan	18.11.2009	18.11.2011	30.01.2018	



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100.	Mr. Nasrullah Khan	20.04.1968	Peshawar	18.11.2009	18.11.2011	18.02.2022	
101.	Mr. Janan Habib	16.05.1964	Charsadda	18.11.2009	18.11.2011	24.08.2020	
102.	Mr. Muhammad Nabi	09.10.1966	Charsadda	30.12.2008	30.12.2010	30.01.2018	Seniority revised due to out of turn vide order No. 601/Legal/E-I, dated 16.03.2023.
103.	Mr. Amir Nawaz	20.03.1970	Charsadda	18.11.2009	18.11.2011	29.11.2018	
104.	Mr. Afsar Zainan	01.09.1969	Mardan	18.11.2009	18.11.2011	29.11.2018	
105.	Mr. Noor Ullah	10.05.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018	
106.	Mr. Mukhtiar Ahmad	03.12.1964	Charsadda	18.11.2009	18.11.2011	30.01.2018	
107.	Mr. Muhammad Irfan	01.08.1970	Karak	12.07.1997	12.07.1999	16.05.2019	
108.	Mr. Arshad Ahmed	06.01.1982	Nowshera	01.01.2010	01.01.2012	24.08.2020	
109.	Mr. Muhammad Kamran	12.02.1981	Malakand	01.01.2010	01.01.2012	18.02.2022	
110.	Mr. Sajid Mumtaz	27.12.1979	Charsadda	01.01.2010	01.01.2012	18.02.2022	
111.	Mr. Fida Hussain	21.01.1983	Peshawar	01.01.2010	01.01.2012	18.02.2022	
112.	Mr. Ijaz Ali	10.04.1983	Charsadda	01.01.2010	01.01.2012	18.02.2022	
113.	Mr. Zaka Ullah	01.10.1965	Nowshera	01.01.2010	01.01.2012	18.02.2022	
114.	Mr. Ali Khan	20.02.1968	Mkd Agency	01.01.2010	01.01.2012	24.08.2020	
115.	Mr. Abdur Rashid	03.05.1968	Charsadda	01.01.2010	01.01.2012	29.11.2018	
116.	Mr. Khalid Khan	02.01.1969	Nowshera	01.01.2010	01.01.2012	29.11.2018	
117.	Mr. Niaz Muhammad	14.09.1973	Charsadda	01.01.2010	01.01.2012	29.11.2018	
118.	Mr. Taj Muhammad Khan	13.02.1979	Nowshera	01.01.2010	01.01.2012	18.02.2022	
119.	Mr. Tauheed Ullah	08.04.1982	Charsadda	01.01.2010	01.01.2012	29.11.2018	
120.	Mr. Ijaz Ali	14.05.1978	Charsadda	01.01.2010	01.01.2012	18.02.2022	
121.	Mr. Adnan Azam	16.06.1984	Charsadda	01.01.2010	01.01.2012	18.02.2022	
122.	Mr. Zahid Alam	15.07.1987	Peshawar	01.01.2010	01.01.2012	18.02.2022	
123.	Mr. Rehmatullah	07.03.1986	Peshawar	01.01.2010	01.01.2012	18.02.2022	
124.	Mr. Muhammad Inam Jan	15.03.1979	Mardan	20.03.2010	20.03.2012	18.02.2022	
125.	Mr. Luqman Khan	15.01.1980	Mardan	20.03.2010	20.03.2012	18.02.2022	



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126.	Mr. Ikhtiraz Khan	14.01.1985	Mardan	20.03.2010	20.03.2012	18.02.2022	
127.	Pir Zar Badshah	25.05.1972	Mkd Agy	20.03.2010	20.03.2012	18.02.2022	
128.	Mr. Muhammad Fazil	03.12.1978	Swabi	20.03.2010	20.03.2012	18.02.2022	
129.	Mr. Imtiaz Ali	03.01.1977	Mardan	20.03.2010	20.03.2012	18.02.2022	
130.	Mr. Sabir Gul	04.03.1984	Mardan	20.03.2010	20.03.2012	18.02.2022	
131.	Mr. Azmat Ali	01.04.1978	Kohat	11.07.2010	11.07.2012	18.02.2022	
132.	Mr. Sadat Khan	06.04.1983	Kohat	24.08.2010	24.08.2012	18.02.2022	
133.	Mr. Fazal Hanif	01.01.1974	Karak	24.08.2010	24.08.2012	18.02.2022	
134.	Mr. Nazar Hussain	10.01.1975	Hangu	24.08.2010	24.08.2012	18.02.2022	
135.	Mr. Muhammad Yousaf	10.04.1975	Karak	24.08.2010	24.08.2012	18.02.2022	
136.	Mr. Nazir Khan	02.04.1977	Kohat	24.08.2010	24.08.2012	18.02.2022	
137.	Mr. Abid Khan	01.03.1979	Kohat	24.08.2010	24.08.2012	18.02.2022	
138.	Mr. Umar Hayat	01.02.1984	Karak	24.08.2010	24.08.2012	18.02.2022	
139.	Mr. Muhammad Abbas	08.02.1986	Shangla	11.02.2013	11.02.2015	16.12.2022	Fast Track Promotee
140.	Mr. Mohammad Arshad Khan	04.04.1982	Dir Lower	11.02.2013	11.02.2015	16.12.2022	Fast Track Promotee
141.	Mr. Azizur Rahman	07.02.1982	Swat	11.02.2013	11.02.2015	16.12.2022	Fast Track Promotee
142.	Mr. Muhammad Mofiz Khan	15.11.1981	Bannu	10.09.2013	10.09.2015	16.12.2022	Fast Track Promotee
143.	Mr. Muhammad Nawab Khan	05.03.1985	Swat	11.02.2013	11.02.2015	16.12.2022	Fast Track Promotee
144.	Mr. Bashir Ahmad	14.01.1981	Haripur	15.03.2013	15.03.2015	16.12.2022	Fast Track Promotee
145.	Mr. Adil Abdal	26.07.1977	Peshawar	22.11.2004	22.11.2006	01.03.2023	
146.	Mr. Bahar Ali	25.09.1981	Mardan	24.11.2007	24.11.2009	01.03.2023	
147.	Mr. Haider Ali	04.10.1983	Charsadda	24.11.2007	24.11.2009	01.03.2023	
148.	Mr. Atta Muhammad	10.10.1983	Mardan	24.11.2007	24.11.2009	01.03.2023	
149.	Mr. Muhammad Yousaf	24.08.1964	Haripur	13.10.2009	13.10.2011	24.08.2020	Seniority revised due to out of turn vide order No. 797/Legal/E-I, dated 27.03.2023.
150.	Mr. Razeem Khan	09.09.1964	Abbottabad	08.04.2008	08.04.2010	01.03.2023	



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151.	Mr. Hastam Khan	12.01.1970	Karak	21.04.2008	21.04.2010	01.03.2023	
152.	Mr. Javed Khan	15.07.1969	Peshawar	21.04.2008	21.04.2010	01.03.2023	
153.	Mr. Muhammad Hanif	07.10.1963	Peshawar	21.04.2008	21.04.2010	01.03.2023	
154.	Mr. Badshah Khan	04.10.1969	Peshawar	21.04.2008	21.04.2010	01.03.2023	
155.	Mr. Ibad ur Rehman	20.02.1965	Charsadda	21.04.2008	21.04.2010	01.03.2023	
156.	Mr. Muhammad Tariq	07.01.1966	Kohat	17.09.2008	17.09.2010	01.03.2023	
157.	Qazi Asmat Ullah	08.05.1970	Mardan	11.08.2009	11.08.2011	01.03.2023	
158.	Mr. Muhammad Rauf	04.04.1963	Mardan	23.11.2006	23.11.2008	25.03.2016	Seniority revised due to out of turn vide order No. 798/Legal/E-I, dated 27.03.2023.
159.	Mr. Jehan Akbar	12.03.1966	Nowshera	18.11.2009	18.11.2011	01.03.2023	
160.	Mr. Riaz Khan	01.01.1974	Peshawar	18.11.2009	18.11.2011	01.03.2023	
161.	Mr. Saifullah	08.05.1967	Charsadda	18.11.2009	18.11.2011	01.03.2023	
162.	Mr. Siyar Muhammad	14.08.1963	Charsadda	18.11.2009	18.11.2011	01.03.2023	
163.	Mr. Abdul Nazir	24.02.1964	Mardan	18.11.2009	18.11.2011	01.03.2023	
164.	Mr. Fazal Rabbi	06.02.1967	Charsadda	18.11.2009	18.11.2011	01.03.2023	
165.	Mr. Amir Hussain	02.10.1963	Charsadda	18.11.2009	18.11.2011	01.03.2023	
166.	Mr. Javed Iqbal	14.04.1971	Peshawar	18.11.2009	18.11.2011	01.03.2023	
167.	Mr. Muhammad Asmat Shah	11.05.1974	Peshawar	18.11.2009	18.11.2011	01.03.2023	
168.	Mr. Dost Muhammad	17.02.1965	Peshawar	18.11.2009	18.11.2011	01.03.2023	
169.	Mr. Mukhtiar Ali	21.04.1978	Mardan	01.01.2010	01.01.2012	01.03.2023	
170.	Mr. Turab Khan	01.04.1973	Peshawar	01.01.2010	01.01.2012	01.03.2023	
171.	Mr. Shah Jehan Afridi	13.04.1973	Peshawar	01.01.2010	01.01.2012	01.03.2023	
172.	Mr. Sardar Gul	28.04.1974	Peshawar	01.01.2010	01.01.2012	01.03.2023	
173.	Mr. Sher Afzal	08.05.1974	Peshawar	01.01.2010	01.01.2012	01.03.2023	



OFFICE OF THE
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KHYBER PAKHTUNKHWA

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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13/18	D.O. Promotion as DSP	Remarks
174.	Syed Muzaffar Shah	06.11.1977	Peshawar	01.01.2010	01.01.2012	01.03.2023	
175.	Mr. Muhammad Shabir	21.06.1981	Peshawar	01.01.2010	01.01.2012	01.03.2023	
176.	Mr. Bashir Ahmad	20.12.1981	Nowsehra	01.01.2010	01.01.2012	01.03.2023	
177.	Mr. Shams-ur-Rehman	17.04.1984	Peshawar	01.01.2010	01.01.2012	01.03.2023	
178.	Mr. Sajjad Hussain	05.02.1987	Peshawar	01.01.2010	01.01.2012	01.03.2023	
179.	Mr. Shafqat Hussain	25.09.1981	Peshawar	01.01.2010	01.01.2012	01.03.2023	
180.	Mr. Asad Ali Shah	06.02.1987	Bannu	15.02.2010	15.02.2012	01.03.2023	
181.	Mr. Mushtaq Hussain	06.03.1969	Mardan	20.03.2010	20.03.2012	01.03.2023	
182.	Mr. Shakeel Khan	02.04.1979	Charsadda	20.03.2010	20.03.2012	01.03.2023	
183.	Mr. Sadat Khan	05.04.1979	Swabi	20.03.2010	20.03.2012	01.03.2023	
184.	Mr. Farooq Zaman	01.04.1979	Swabi	20.03.2010	20.03.2012	01.03.2023	
185.	Mr. Jawad Khan	11.04.1979	Swabi	20.03.2010	20.03.2012	01.03.2023	
186.	Mr. Rooh-ul-Amin	03.03.1987	Swabi	20.03.2010	20.03.2012	01.03.2023	
187.	Mr. Fahad Khan	03.04.1984	Swat	14.05.2010	14.05.2012	01.03.2023	
188.	Mr. Raees Khan	16.05.1984	Dir Lower	14.05.2010	14.05.2012	01.03.2023	
189.	Mr. Akbar Zeb	12.03.1983	Mkd: Agy	14.05.2010	14.05.2012	01.03.2023	
190.	Mr. Javaid Khan	18.05.1979	Swat	14.05.2010	14.05.2012	01.03.2023	
191.	Mr. Akbar Muhammad	16.01.1975	Mardan	14.05.2010	14.05.2012	01.03.2023	
192.	Mr. Faqir Gul	16.03.1974	Dir Lower	14.05.2010	14.05.2012	01.03.2023	
193.	Mr. Roshan Zada	03.12.1975	Buner	14.05.2010	14.05.2012	01.03.2023	
194.	Mr. Farooq Jan	01.05.1975	Dir Upper	14.05.2010	14.05.2012	01.03.2023	
195.	Mr. Muhammad Bashir	03.01.1967	Shangla	14.05.2010	14.05.2012	01.03.2023	
196.	Mr. Sher Wali Khan	06.03.1975	Buner	14.05.2010	14.05.2012	01.03.2023	



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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13-18	D.O Promotion as DSP	Remarks
197.	Mr. Pir Said	15.03.1974	Buner	14.05.2010	14.05.2012	01.03.2023	
198.	Mr. Akbar Hayat	01.01.1970	Swat	14.05.2010	14.05.2012	01.03.2023	
199.	Mr. Rehman Yousaf	02.03.1972	Dir Lower	14.05.2010	14.05.2012	01.03.2023	
200.	Mr. Shaukat Ali	14.03.1978	Dir Upper	14.05.2010	14.05.2012	01.03.2023	
201.	Mr. Tika Khan	13.02.1978	Swat	14.05.2010	14.05.2012	01.03.2023	
202.	Mr. Attaullah Khan	22.07.1979	Dir Lower	14.05.2010	14.05.2012	01.03.2023	
203.	Mr. Ahmad Essa	15.05.1978	Chitral	14.05.2010	14.05.2012	01.03.2023	
204.	Mr. Ihsan Ullah Khan	14.01.1975	Swat	14.05.2010	14.05.2012	01.03.2023	
205.	Mr. Sher Hassan	15.05.1968	Shangla	14.05.2010	14.05.2012	01.03.2023	
206.	Mr. Muhammad Sattar Khan	04.04.1964	Chitral	13.07.2005	13.07.2007	25.03.2016	Implementation of out of turn order No. 578/Legal/E-I, dated 15.03.2023 withheld under letter bearing Writ Petition No. 488-M/2022, dated 26.04.2022. Seniority revised due to out of turn vide order No. 796/Legal/E-I, dated 27.03.2023.
207.	Mr. Saeed-ur-Rehman	01.04.1963	Dir Lower	14.05.2010	14.05.2012	01.03.2023	
208.	Mr. Muhy-ud-Din	01.04.1964	Chitral	14.05.2010	14.05.2012	01.03.2023	
209.	Mr. Mubarak Ahmad	22.06.1964	Chitral	14.05.2010	14.05.2012	01.03.2023	
210.	Mr. Muhammad Ghulam	15.04.1964	Buner	14.05.2010	14.05.2012	01.03.2023	
211.	Mr. Iqbal Karim	10.01.1966	Chitral	14.05.2010	14.05.2012	01.03.2023	
212.	Mr. Muhammad Zaman	01.01.1965	Buner	13.07.2005	13.07.2007	25.03.2016	Implementation of out of turn order No. 574/Legal/E-I, dated 15.03.2023 withheld under letter bearing Writ Petition No. 488-M/2022, dated 26.04.2022. Seniority revised due to out of turn vide order No. 795/Legal/E-I, dated 27.03.2023.
213.	Mr. Hassan Ullah	07.12.1966	Chitral	14.05.2010	14.05.2012	01.03.2023	



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Sr No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13:18	D.O Promotion as DSP	Remarks
214.	Mr. Ghulam Ali	22.08.1966	Chitral	14.05.2010	14.05.2012	01.03.2023	
215.	Mr. Amir Shah	01.01.1968	Chitral	14.05.2010	14.05.2012	01.03.2023	
216.	Mr. Shoukat Hayat	20.12.1982	Kohat	24.08.2010	24.08.2012	01.03.2023	
217.	Syed Tahir Shah	20.03.1972	Peshawar	20.01.2011	20.01.2013	01.03.2023	
218.	Mr. Ihsan Shah	10.06.1977	Mkd:Agency	20.01.2011	20.01.2013	01.03.2023	
219.	Mr. Naeem Khan	06.01.1987	Buner	22.02.2011	22.02.2013	01.03.2023	
220.	Mr. Muhammad Shafi	15.01.1966	Chitral	22.02.2011	22.02.2013	01.03.2023	
221.	Mr. Bahadar Khan	18.12.1964	Chitral	22.02.2011	22.02.2013	01.03.2023	
222.	Mr. Muhammad Nazir Shah	13.04.1963	Chitral	22.02.2011	22.02.2013	01.03.2023	
223.	Mr. Aqeel Shah	07.06.1965	Mardan	22.02.2011	22.02.2013	01.03.2023	
224.	Mr. Tamiz Ud Din	01.05.1966	Chitral	22.02.2011	22.02.2013	01.03.2023	
225.	Mr. Muhammad Iqbal	19.04.1978	DIKhan	23.06.2011	23.06.2013	01.03.2023	
226.	Mr. Saqbar Shah	15.06.1973	Mardan	27.09.2011	27.09.2013	01.03.2023	
227.	Mr. Saz Wali	02.10.1963	Peshawar	27.09.2011	27.09.2013	01.03.2023	
228.	Syed Fareed Shah	03.05.1965	Nowshera	27.09.2011	27.09.2013	01.03.2023	
229.	Mr. Muhammad Arif	06.09.1964	Swabi	27.09.2011	27.09.2013	01.03.2023	
230.	Mr. Fazal Rehman	24.04.1966	Peshawar	27.09.2011	27.09.2013	01.03.2023	
231.	Mr. Bashir Gul	11.03.1966	Charsadda	27.09.2011	27.09.2013	01.03.2023	
232.	Mr. Ghaffar Ali	05.02.1969	Peshawar	27.09.2011	27.09.2013	01.03.2023	

Annex "P"

خدمت جناب کیمپل مٹی پولیس آفیسر پشاور

عنوان: درخواست برادر بحالی سناری

جناب عالی!

نہایت ہی ادب سے گزارش ہے کہ اسٹیبلشمنٹ برانچ دفتر جناب سی سی پی او صاحب پشاور نے جو لسٹ سی پی او آفس کو ارسال کی ہے اس میں سائل کو دوست محمد خان اور قیمت گل خان کے ساتھ لسٹ ڈی کو لکس لکھا ہے۔

جناب عالی!

سائل کے والد جن کا نام احسان اللہ ہے جو تھانہ بڈھ بیر میں ایس ایچ او تعینات تھا۔ مورخہ 29.03.1991 کو چند مفرور جو کہ ایک بڑی واردات کے سلسلے میں پشاور کی طرف آرہے تھے۔ پولیس نے ان کا تعاقب کیا اور ان ملزمان نے تھانہ داوڑی کے علاقے میں ایک گھر میں پناہ لی۔ پولیس کی نفی موقع پر پہنچی۔ بدوران مقابلہ پولیس اہلکار شہید اور زخمی ہوئے۔ جن میں میرے والد صاحب جن کو تھانہ بڈھ بیر سے خاص طور پر بلایا گیا اور انہوں نے اس آپریشن میں ایک کلیدی کردار ادا کیا اور سر پر گولی لگنے سے سر کی ہڈی کا 1/3 حصہ جدا ہو گیا اور بعد میں بڑی تکلیف برداشت کرنے کے بعد وفات پا گئے۔ یہ خیر پختونخوا پولیس کی تاریخ کا ایک واحد پولیس آپریشن تھا جس میں اس وقت کے انسپکٹر جنرل پولیس جناب سید مسعود شاہ صاحب، ڈی آئی جی صاحب پشاور ریجن، اے آئی جی صاحبان اور دیگر پولیس کے اعلیٰ افسران بھی موقع پر موجود تھے اور انسپکٹر جنرل پولیس جناب سید مسعود شاہ صاحب بذات خود موقع پر آپریشن کی نگرانی کر رہے تھے۔ جو کہ ایف آئی آر نمبر 144 مورخہ 29.03.1991 تھانہ داوڑی اس کا واضح ثبوت پیش کرتی ہے۔

جناب عالی!

میرے والد کی اعلیٰ خدمات کی بناء پر سائل کو Selection Grade Constable بمطابق پولیس رولز 1934(A) 12.10 بھرتی کیا گیا۔ جو کہ 12-10(A) آؤٹ آف ٹرن کے زمرے میں نہیں آتا ہے۔

جناب عالی!

جہاں تک میری پروموشن بطور ASI Special Case Officiating کے تعلق ہے اس سلسلے میں عرض ہے کہ Officiating ترقی کوئی مستقل ترقی نہیں ہوتی۔ نا ہی مجھے کسی دوسرے ساتھی (Colleague) پر نوٹ دی گئی ہے اور نا ہی میں نے اپنے Colleague کی سناری متاثر کی ہے۔ میری کنفرمیشن بطور ASI بحوالہ دفتر جناب سی سی پی او صاحب پشاور کو نوٹیفیکیشن نمبر 1-5080/EC مورخہ 21.03.2003 یعنی سات سال کے بعد ہوئی۔

جناب عالی!

میرے List "D" Colleagues جس کی تفصیل FIA پر موجود ہے۔ ان میں جن دوسا تھیوں کا ذکر ہے۔ انہی دوست محمد نمبر 3590 اور قیمت گل خان نمبر 446، اس سلسلے میں عرض ہے کہ دوست محمد نمبر 3590 جو کہ ڈاگنی جدید ضلع نوشہرہ کا رہائشی تھا اور کافی عرصہ پہلے وفات پا چکا ہے اور قیمت گل خان نمبر 446 جو کہ ضلع نوشہرہ کا بھرتی تھا اور ریٹائرڈ ہو چکا ہے۔ جبکہ من سائل نے لوئر سکول کورس ضلع نوشہرہ سے کیا ہے تاکہ ضلع پشاور سے مزید سائل کے لوئر کے ساتھی فقیر خان نمبر 429، حضرت علی 776، خالد شیر 436، مسعود علی نمبر 716 اور تلامذت نمبر 435 بھی ریٹائرڈ ہو چکے ہیں۔ سناری میں میرا نام انسپکٹر ڈاکٹر اللہ خان نمبر 308 کے نام کے نیچے سرل نمبر 202 پر درج کیا ہے جو کہ غلط ہے۔ انسپکٹر ڈاکٹر اللہ نے میرے ساتھ انٹرمیڈیٹ کورس نہیں کیا ہے۔ ہر ایک ضلع کا لوئر سکول کورس پاس کرنے والوں کی اپنی سناری ہوتی ہے۔ میرے ساتھ پشاور سے انسپکٹر ڈاکٹر اللہ اور اسی طرح صوبہ کے دوسرے ضلعوں سے بھی بلکہ ملک کے دوسرے صوبوں سے بھی لوگوں نے جیسا کہ ظہور اللہ بن 764 ضلع چترال، شیر رحمان 140 ضلع مردان، جمال الدین گلگت، گل احمد 84 غرار NA، نذیر احمد 291 دیابیر اور لطیف اللہ FIA پشاور جنہوں نے من سائل کے ساتھ لوئر سکول کورس کیے ہیں۔ اور اسی طرح میرے لوئر کورس میٹ فقیر خان 429 ضلع نوشہرہ کے ساتھ پشم گل 349 ضلع نوشہرہ جنہوں نے سال 2002 میں انٹرمیڈیٹ مکمل کر کے جو کہ اب فقیر خان ریٹائرڈ ہو چکا ہے۔ جبکہ پشم گل سال 2018 میں بعدہ ڈی ایس پی ترقیاب ہوا ہے۔ FIB جس طرح قیمت گل خان نمبر 1264 کا جناب سی سی پی او صاحب پشاور کی لسٹ میں ذکر ہے اس نے سال 2006 میں انٹرمیڈیٹ کورس کیا تھا اور پشاور کا بھرتی ہے۔

جو کاب آئیگولا ہے۔ کاپی مراد FIC پر موجود ہے۔ جسٹس میں دوست محمد ادرت گل خان نمبر 1264 کا ذکر ہے یہ میرے "D-List" میں میرے Colleague ہیں
ہے۔ میرے "D-List" میں دوست محمد نمبر 3590 اور قیامت گل نمبر 446 میرے Colleague ہیں۔ جیسا کہ میرے "D-List" کے تمام Colleague
رہنا کر ڈھونڈے ہیں اور ان میں سے کافی وقایع بھی پانچے ہیں۔ اور میرے مارے "D-List" کے Colleague رہنا کر ڈھونڈے ہوئے ہیں۔
جناب عالی!

سائل نے انٹرمیڈیٹ کورس 1995 میں کیا۔ انٹرنیشنل ASI بطور کوشل کیس 19.12.1995 کو بنا یا گیا۔ بطور ASI کنٹرول میں سات سال بعد کویشن
21.08.2003 کو ہوئی۔ سائل نے اپر کورس 20.04.2004 کو کیا۔ بطور Officialing SI 31.05.2004 کو بنا۔ سب آئیگولا 09.04.2008 کو کلام کیا گیا
F/List آئیگولا آپیکز پر مشورتن 20.05.2008 کو ہوئی۔ آپیکز کنٹرول میں 31.10.2013 کو ہوئی جبکہ ترقی بہ عہدہ ڈی ایس پی 24.10.2014 کو ہوئی۔ سائل کی
درخواست پر جناب سی سی پی او صاحب پشاور نے بحوالہ چھٹی مشورلے آئی بی لیگل کومال 2021 میں سرکل کر کے جس پر جناب سائل نے بحوالہ چھٹی مشورلے نمبری
338/LEGAL مورخہ 17.01.2022 کو اپنی رائے سے آگاہ کرتے ہوئے اس میں باقاعدہ کٹا لٹا لٹا میں رائے دی ہے کہ من سائل آؤٹ آف لیٹن کے درجے میں
نہیں آتا ہے۔ FID

جناب عالی!
سائل نے کئی کیڈٹ رہا ہے اور نہ کئی Out of turn promotion لی ہے۔ اور نہ ہی اپنے کئی Colleague کی سنیاری کی کو سٹاٹز کیا ہے۔ میرے بعد جتنے
بھی دوسرے ایگولوں نے انٹرمیڈیٹ کورس پاس کیا ہے۔ وہ بھی بعد وہ ڈی۔ ایس۔ پی ترقی پانچے ہیں۔
لہذا ایڈریس درخواست استدعا ہے کہ سائل کا نام ڈی۔ ایس۔ پی سنیاری لیٹ میں بدستور درج رہنے کا حکم صادر فرمائیں۔
تاریخ دعا گو ہے گا۔

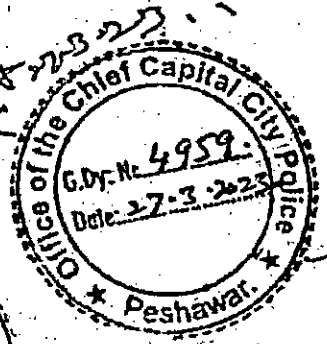
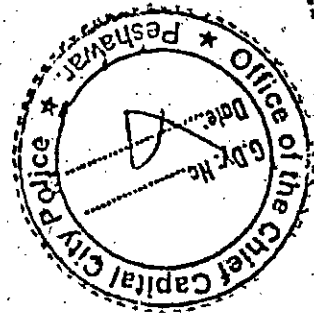
العارض

سائل تابع فرمان رحمت اللہ خان ایکٹنگ ایس پی ایف آر پی پشاور ریجن پشاور۔

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G.D.F. No. 4959
27-3-23

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28-3-23

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Ahmed

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IN THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. _____/2023



Rehmat Ullah Acting DSP Headquarter
Frontier Reserve Police (F.R.P)
Police Lines Peshawar.....Petitioner

V E R S U S

1. Govt. of Khyber Pakhtunkhwa
Through Chief Secretary Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar
2. Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
3. Additional Inspector General
of Police Headquarter, C.P.O Peshawar
4. Additional Inspector General
of Police Investigation, C.P.O Peshawar
5. Chief Capital City Police Officer, Police Lines,
Peshawar
6. Assistant Inspector General of Police (Establishment)
C.P.O Peshawar
7. Assistant Inspector General of Police legal (AIG
Legal) C.P.O Peshawar

.....Respondents

**WRIT PETITION UNDER ARTICLE 199 OF
THE CONSTITUTION OF THE ISLAMIC
REPUBLIC OF PAKISTAN, 1973**

**ATTESTED
EXAMINER
Peshawar High Court**

SP

Respectfully Sheweth:

1. That the petitioner is law abiding citizen of Pakistan, currently serving in the Khyber Pakhtunkhwa Police with an unblemished and outstanding service records.
2. That the petitioner is the real son of Late Mr. Ihsan Ullah Khan Inspector who got injured in an encounter case on 29.03.1991 Supervising by the then Inspector General of Police Syed Masud Shah and other Police High-up's. (Copy of FIR is annexed as annexure "A").
3. That on 08.2.1995 a Standing Medical Board Comprising of three Senior Doctors/Members was constituted and the said Standing Medical Board opined that Mr. Ihsan Ullah Khan Inspector (late) is completely and permanently incapacitated for further service of any kind. For ready reference the opinion of Standing Medical Board is reproduce herein below:

"We consider that Mr. Ahsan Ullah Inspector is completely and permanently incapacitated for further service of any service of any kind"

ATTESTED
EXAMINER
Peshawar High Court

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in consequence of the above mentioned disease, he is not fit for further service and should be boarded out from service" (Copy of report/opinion of S.M.B is attached as annexure "B")

4. That the present petitioner was appointed as Selection grade Constable on 29.03.1992 and later on due to the above mentioned reason fully detailed in Para No.1 and 2 of the instant petition, the petitioner was promoted as officiating ASI on 17.12.1995. (Copy of Notification is attached as annexure "C").
5. That the date of confirmation of ASI of the petitioner became 17.12.1997 (two year), moreover it is very important to mention here that in 1998 so many vacancies of S.I's (Sub Inspectors) were available in department for which the present petitioner was entitled but the petitioner was deprived from his fundamental and valuable rights on the basis of malafide intention and the respondents/ department not promoted the petitioner to the

ATTESTED
EXAMINER
Peshawar High Court

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rank of SI in 1998. (Copy of the promotion to the rank of SI is attached as annexure "D").

6. That the petitioner was confirmed/promoted to the rank of ASI vide Notification dated 21.06.2003 instead of 17.12.1997 which was against the law, rules, natural justice, fundamental rights, and the petitioner was debarred from his 7 years seniority. (Copy of Notification dated 21.06.2003 is attached as annexure "E").

7. That due to the negligence, omissions, commissions and malafides of the respondents /department the present petitioner was promoted as officiating SI vide notification dated 31.05.2004 instead of 17.12.1997. (Copy of Notification dated 31.05.2004 is attached as annexure "F")

8. That the petitioner was confirmed in the rank of SI vide Notification dated 09.04.2008 malafidely and unjustly. (Copy of Notification dated 09.04.2008 is attached as annexure "G").

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9. That it is very strange that being a senior police official the petitioner was promoted as officiating Inspector vide Notification dated 20.05.2008 instead of 2000. (Copy of Notification dated 20.05.2008 is attached as annexure "H").
10. That the respondents/department issued Notification through which the petitioner was confirmed to the rank of Inspector in 2013 instead of 2003 and respectively the respondent No.1 issued a Notification vide dated 24.10.2014 whereby the present petitioner was promoted to the rank of DSP. (Deputy Superintendent of Police BPS-17) instead of 2004. (Copy of Notification dated 24.10.2014 is attached as annexure "I" & "I/1").
11. That the petitioner filed a Departmental appeal/Representation before the respondent No.1 on 10.10.2002 which is still pending before the respondents and no appropriate response was given by the respondents/department uptill now, hence the instant petition, moreover

~~ATTESTED~~
EXAMINER
Peshawar High Court

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certain notifications are also issued by the respondents on different dates fully mentioned in the departmental appeal/representation which are attached with the main departmental appeal/Representation. (Copies of the departmental appeal/representation dated 10.10.2022 is attached as annexure "J", while Notification dated 28.03.2022 6221/EC-1, Notification dated 05.04.2022 6914/EC-1 are annexed as annexures "K, L while copy of police rules 1975 is attached as annexure "M". Copy of opinion of AIG legal is annexed as annexure "N", guidance is attached as annexure "O" while letter issued by the CCPO /respondent No.5 is annexed as annexure "P").

12. That the petitioner filed a departmental appeal on 15.03.2023 for his 7 years seniority and promotion to the rank of Superintendent of police (BPS-18) which is pending before the Service Tribunal of Khyber Pakhtunkhwa in which next date for preliminary hearing is fixed i.e. 02.05.2023. (Copy of service appeal is annexed as annexure "Q").

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the instant writ petition) was handed over to the present petitioner on 21.03.2023.

17. That the petitioner also filed a review petition through proper channel for withdrawal of the impugned Letter/Notification before the worthy respondent No.2 (Appellate Authority) vide dated 27.03.20123 but no positive response was given by the respondent No.2, hence the instant writ petition. (Copy of the review petition is attached as annexure "U").

18. That the respondent No.2 issued a fresh seniority list of DSP's NO./CPO/E-I/seniority list/848 vide dated 29.03.20123 whereby the respondent No.2 unlawfully expunged the name of the petitioner from the above mentioned list which is a serious and great miscarriage of justice. (Copy of seniority list of DSP's No./CPO/E-I/seniority list/848 is annexed as annexure "V").

19. That feeling aggrieved of the impugned letter/Notification of demotion of the petitioner, the present petitioner seeks to invoke the

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13. That the respondent no.2 passed demotion order No.579/legal /E-I dated 15.03.2023 against the petitioner on the basis of malafide intention which is illegal, ultra vires against the law, rules and natural justice, (now impugned in the instant writ petition). **(Copy of the impugned Notification /order dated 15.03.2023 is attached as annexure "R").**

14. That a notification No.1594/ISE dated 05.08.2022, final seniority list of DPs BPS-17 was also issued by the respondent No.2 whereby the name of the petitioner was placed in serial No.84 of the above mentioned seniority list. **(Copy of seniority list dated 05.08.2022 is attached as annexure "S").**

15. That a final revised seniority list of inspectors issued by the respondent No.2 vide notification No.431/E-II/CPO dated 06.12.2022. **(Copy of the Notification dated 06.12.2022 is annexure "T").**

16. That the demotion Notification No.5749-I/Legal/E-I dated 15.03.2023 (Now impugned in

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constitutional jurisdiction of this August Court
inter alia on the following grounds:

GRUNDS:

- A. Because the case of the present petitioner does not falling under the ambit of out of turn promotion and this fact has been admitted by the AIG legal on behalf of respondent No.2 through his legal opinion and guidance.
- B. Because the impugned letter/Notification No. 579/legal/E-I dated 15.03.2023 is illegal, unlawful, arbitrary, malafide, capricious, without jurisdiction and violative of the petitioner's rights as enshrined, guaranteed and protected by articles 2-A, 4, 8, 9, 10-A and 27 of the Constitution of Islamic republic of Pakistan, 1973, prevailing Police Rules 1934 and Khyber Pakhtunkhwa Police Act, 2017, judgment and order of the Apex Court in the case of Shahid Pervaiz Vs Ejaz Ahmad (Reported as 2017 SCMR 206), norms and natural justice.

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- C. That the respondents under the garb of their own interpretation of the orders and directions of the Supreme Court, illegally and unlawfully issued the impugned demotion letter/ notification of the petition vide the impugned letter/Notification dated 15.03.2023.
- D. Because the sham, frivolous and fabricated hearing/proceedings conducted by the respondents, the present petitioner was not given any proper opportunity of hearing as envisaged in Article 10-A of the Constitution as the same were a mere formality in light of the instruction issued by the police department/ respondents on a day to day basis vide the impugned letter /Notification dated 15.03.2023 which was issued without even waiting for the outcome of the Sham, fabricated hearing/proceedings. It goes without saying that the aforementioned sham, fabricated and frivolous hearing/proceedings and exercise conducted by the Police Department/respondents do not fulfil the requirements of settled law and principles of

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natural justice, let one the due process mandated under Article 10-A of the constitution.

E. Because despite no direction /order of the Apex Court issued to the respondent No.1, on his own accord, with malafide intentions and for ulterior motives, vide his impugned letter/notification dated 15.03.2023, the respondents are unable to implement the aforementioned judgments of the Apex Court, pertaining to out of turn promotions of police official/officer, in Khyber Pakhtunkhwa in true letter and spirit. The same speaks high volumes of malafide on part of the respondents, who for ulterior motives, are eager to demotion so that the respondents blue eyed could be accommodated.

F. Because the actions of the respondents are based on malafide aimed only to hoodwink and defeats the mandate and the purpose of the law, vested rights and fundamental rights of the petitioner guaranteed by the

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Constitution and the principles of natural justice.

G. Because the petitioner have no other alternate and efficacious remedy but to invoke the constitutional jurisdiction of this Hon'ble Court through the instant petition.

H. Because the petitioner, with the permission of this Hon'ble Court, wishes to raise and rely upon additional grounds during the course of arguments.

I. That any other ground not specifically mention may be raised at the time of arguments with the prior permission of this Hon'ble Court.

Prayers:

It is, therefore, most humbly prayed that on acceptance of this writ petition, this Hon'ble Court may graciously be pleased to:-

- I. Declare the impugned letter /notification of respondent No.2 No.579/legal/E-I dated 15.03.2023 is arbitrary, capricious, malafide,

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unreasonable, illegal, unlawful,
without jurisdiction and void ab initio.

- II. Set aside impugned letter/
Notification of the respondent No.2
No.579/legal/E-1 dated 15.03.2023,
as being arbitrary, capricious,
malafide, unreasonable, illegal,
unlawful, without jurisdiction and
without any lawful authority.
- III. Permanently restrain the respondents
from interfering, in any manner
whatsoever, with the seniority of the
petitioner under the garb of out of
turn promotion and through the
impugned letter/notification of the
respondents No.579/Legal/E-1 dated
15.03.2023.
- IV. Grant any other relief as this Hon'ble
Court deems fit and appropriate in
the facts and circumstances of the
case.

ATTESTED
EXAMINER
Beshwar High Court

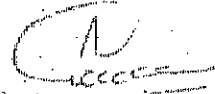
120

INTERIM RELIEF

By way of interim relief, the operation of the impugned letter/Notification No.579/legal/E-I dated 15.03.2023 of respondent No.2 may kindly be suspended till the final disposal of the instant writ petition.

Petitioner

Through



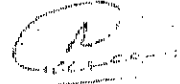
Tariq Khan Hoti

Advocate High Court

Dated 07.04.2023

CERTIFICATE

It is certified that no such like writ petition has earlier been filed before this Hon'ble Court regarding the present subject matter.

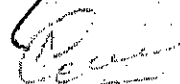


ADVOCATE

List of Book

1. Constitution of Pakistan, 1973
2. The Police Rules 1934
3. The Police Rules 1975
4. Other relevant law books

CERTIFIED TO BE TRUE COPY
EXAMINED
Peshawar High Court, Peshawar
Authorized Under Article 87 of
the Qanun-e-Shahadat Act 1984
06 JUL 2023



ADVOCATE

10/

IN THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. _____/2023

Rehmat Ullah.....Petitioner

VERSUS

Govt. of Khyber Pakhtunkhwa
Through Chief Secretary & others.....Respondents

AFFIDAVIT

I, Rehmat Ullah Son of Ahsan Ullah Khan, Acting DSP
Headquarter Frontier Reserve Police (F.R.P), Police Lines
Peshawar, do hereby solemnly affirm and declare on oath
that the contents of the accompanying **Writ Petition** are
true and correct to the best of my knowledge and belief
and nothing has been concealed from this Hon'ble Court.

Identified by:

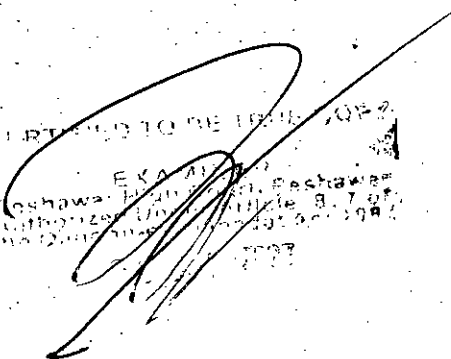


Tariq Khan Hoti
Advocate High Court


DEPONENT

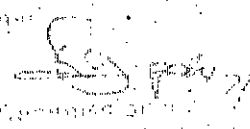
CNIC No.17201-2301572-1
Cell No.0300-5996389

EXAMINED TO BE TRUE
Peshawar: High Court, Peshawar
Authorized Officer: _____
Date: _____



3450
Certified that the above was verified on solemn
affirmation before me in office, this _____ day of _____

_____ by _____



PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

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Annex 1

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
1	2
22.06.2023	<p><u>W.P No.1393-P/2023.</u></p> <p>Present: Mr. Tariq Khan Hoti, Advocate for the petitioner.</p> <p>Mr. Amir Javed, Advocate General and Mr. Mubashir Manzoor, AAG.</p> <p>Mr. Rizwan Manzoor, DIG(HQrs), Khyber Pakhtunkhwa Police, CPO.</p> <p>Muhammad Asif, AIG(Legal), CPO.</p> <p>Muhammad Tariq Usman, Inspector (Legal), CPO.</p> <p>*****</p> <p><u>IJAZ ANWAR, J.</u> It is alleged that the petitioner was promoted as officiate ASI, as a special case, vide order dated 17.12.1995, however, according to the learned counsel for the petitioner, he was brought on list D, along with his colleagues vide Office Order dated 24.03.1996 and was treated as head Constable. He further stated that in the year 2003, he was confirmed as ASI along with his colleagues. He further submitted that on mere promotion as officiating ASI, he has not disturbed the seniority of any of the police officials/officers.</p> <p>2. The representatives of the respondent department present in the Court, stated that in order to ascertain all these facts, he will be having no objection if this case is remitted back to the respondent department for its reconsideration.</p>





(Handwritten mark)

ATTESTED
EXAMINER
Peshawar High Court

3. In view of the above, this writ petition is disposed of with direction to the respondents to reconsider the impugned decision and also to ascertain that on his promotion as officiating ASI and on his subsequent regular promotion, has he got any undue benefit in the regular promotion. Besides, the petitioner be also given right of hearing. Till then, the impugned letter/Notification No.579/legal-E-I dated 15.03.2023 shall remain suspended.

Announced
Dt:22.06.2023


JUDGE


JUDGE

(Amir Shehzad) *

(DB) Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice S.M Attique Shah

7/12
 Date of Presentation of Application 06/12/2023
 No of Pages 178
 Copying fee 1800
 Total 1800
 Date of Preparation of Copy 06/12/2023
 Date of Delivery of Copy 06/12/2023
 Signature of R. [Signature]



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Annex "R"

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 570 /2023



Rehmat Ullah Acting SP
Frontier Reserve Police (F.R.P)
Police Lines, Peshawar..... **Appellant**

VERSUS

1. Govt. of Khyber Pakhtunkhwa
Through Chief Secretary Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
2. Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
3. Additional Inspector General
of Police Headquarter, C.P.O Peshawar
4. Additional Inspector General
of Police Investigation, C.P.O Peshawar
5. Chief Capital City Police Officer, Police Lines,
Peshawar
6. Assistant Inspector General of Police (Establishment)
C.P.O Peshawar **Respondents**

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL
ACT, 1974**

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

27/7/23

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Prayer

On acceptance of the instant service appeal,

- I) The omissions and commissions of respondents be declared as illegal, against the law, rules, unjustified, unconstitutional against natural justice and fundamental rights of the appellant.
- II) directing the respondents to promote the appellant to the rank of SP (Superintendent of Police in BPS-18) on due seniority basis.
- III) awarded seven (7) years seniority to the appellant as per rules.
- IV) The appellant may also be held entitled for full consequential and back benefits of service.
- V) Any other relief deems fit and appropriate in the circumstances of the instant appeal may also be passed

Respectfully Sheweth:

ATTESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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1. That the appellant is the real son of Late Mr. Ihsan Ullah Khan Inspector who got injured in an incounter case on 29.03.1991 Supervising by the then Inspector General of Police Syed Masud Shah and other Police High-up's. (Copy of FIR is annexed as annexure "A").
2. That on 08.2.1995 a Standing Medical Board Comprising of three Senior Doctors/Members was constituted and the said Standing Medical Board opined that Mr. Ihsan Ullah Khan Inspector (late) is completely and permanently incapacitated for further service of any kind. For ready reference the opinion of Standing Medical Board is reproduce herein below:

"We consider that Mr. Ahsan Ullah Inspector is completely and permanently incapacitated for further service of any service of any kind in consequence of the above mentioned disease, he is not fit for further service and should be boarded out from service" (Copy of report/opinion of S.M.B is attached as annexure "B")

ATTESTED

EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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3. That the present appellant was appointed as Selection grade Constable on 29.03.1992 and later on due to the above mentioned reason fully detailed in Para No.1 and 2 of the instant appeal, the appellant was promoted as officiating ASI on 17.12.1995. **(Copy of Notification is attached as annexure "C")**.
4. That the date of confirmation of ASI of the appellant became 17.12.1997 (two year) moreover it is very important to mention here that in 1998 so many vacancies of S.I's (Sub Inspectors) were available in department for which the present appellant was entitled but the appellant was deprived from his fundamental and valuable rights on the basis of malafide intention and the respondents/department not promoted the appellant to the rank of SI in 1998. **(Copy of the promotion to the rank of SI is attached as annexure "D")**.
5. That the appellant was confirmed/promoted to the rank of ASI vide Notification dated 21.06.2003 instead of 17.12.1997 which was

ATTESTED

K. S. S. S. S. S.
Secretary
Peshawar

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against the law, rules, natural justice, fundamental rights, and the appellant was debarred from his 7 years seniority. **(Copy of Notification dated 21.06.2003 is attached as annexure "E").**

6. That due to the negligence, omissions, commissions and malafides of the respondents /department the present appellant was promoted as officiating SI vide notification dated 31.05.2004 instead of 17.12.1997. **(Copy of Notification dated 31.05.2004 is attached as annexure "F")**

7. That the appellant was confirmed in the rank of SI vide Notification dated 09.04.2008 malafidely and unjustly. **(Copy of Notification dated 09.04.2008 is attached as annexure "G").**

8. That it is very strange that being a senior police official the appellant was promoted as officiating Inspector vide Notification dated 20.05.2008 instead of 2000. **(Copy of Notification dated 20.05.2008 is attached as annexure "H").**

ATTESTED
EXAMINER
Khyati
Service Tribunal
Peshawar

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9. That the respondents/department issued Notification through which the appellant was confirmed to the rank of Inspector in 2013 instead of 2003 and respectively the respondent No.1 issued a Notification vide dated 24.10.2014 whereby the present appellant was promoted to the rank of DSP. (Deputy Superintendent of Police BPS-17) instead of 2004. **(Copy of Notification dated 24.10.2014 is attached as annexure "I")**.

10. That the appellant filed a Departmental appeal/Representation before the respondent No.1 on 10.10.2002 which is still pending before the respondents and no appropriate response was given by the respondents/department uptill now, hence the instant appeal, moreover certain notifications are also issued by the respondents on different dates fully mentioned in the departmental appeal/representation which are attached with the main departmental appeal/Representation. **(Copies of the departmental appeal/representation dated 10.10.2022 is attached as annexure "J",**

ATTESTED
[Signature]
[Stamp: Director of Services, Punjab]

No

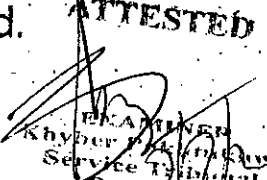
while Notification dated 28.03.2022 6221/EC-1, Notification dated 05.04.2022 6914/EC-I are annexed as annexures "F/A, F/B and while copy of police rules 1975 is attached as annexure "F/C" Copy of opinion of AIG legal is annexed as annexure "F/D" respectively).

11. That being aggrieved from the above mentioned Orders/Notifications, the appellant now, approaches before this Hon'ble Tribunal on the following grounds inter alia:

G R O U N D S:

A. That the omission and commission of the respondents are illegal, unconstitutional and unlawful authority and of no legal effect, therefore need the interference of this Hon'ble Tribunal.

B. That the respondents are denying the fundamental and valuable rights as guaranteed by Articles 4 and 5 of the Constitution of Pakistan, 1973 and law of the land.

ATTESTED

BEFORE ME
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

///

C. That the appellant is senior, fit, eligible and coming upto the criteria has got every right to be promoted as SP (Superintendent of Police in BPS-18) but the respondents deprived the appellant from his fundamental and valuable rights.

D. That so many vacancies/posts of SP (Superintendent of Police in BPS-18) are available in police department but the respondents are denying such facts which defeats the rights of the appellant.

E. That due to the negligence, omissions, commission, malafides and illegal acts of the respondents the appellant was deprived from his right which is against the law, police rules, natural justice and ineffective upon the fundamental rights of the appellant.

F. That in order to deprived the appellant of his due right of promotion to the rank of SP (BPS-18) and favour near and dear, the Appellant was learnt that juniors to the appellant are going to be considered for promotion.

ATTESTED

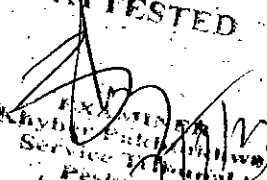
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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- G. That there is no omission and commission on the part of the appellant and the appellant could not be punished for the fault of others if any.
- H. That in view of the above facts and circumstances the appellant was illegally deprived from his due promotion which necessitated the interference of this Hon'ble Tribunal.
- I. That any other ground not specifically mention may be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that by accepting this service appeal,

- I. The omissions and commissions of respondents be declared as illegal, against the law, rules, unjustified, unconstitutional against natural justice and fundamental rights of the appellant.**
- II. directing the respondents to promote the appellant to the rank of SP**

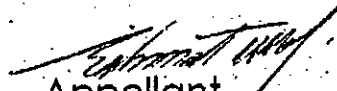
ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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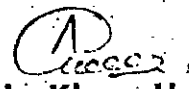
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(Superintendent of Police in BPS-18)
on dueseniority basis.

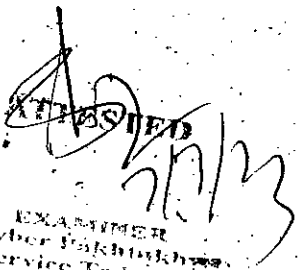
- III. awarded seven (7) years seniority to the appellant as per rules.
- IV. The appellant may also be held entitled for full consequential and back benefits of service.
- V. Any other relief deems fit and appropriate in the circumstances of the instant appeal may also be passed.


Appellant

Through


Tariq Khan Hoff
Advocate High Court

Dated 14.03.2023


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Rehmatullah is Court



5th July, 2023

1. Learned counsel for the appellant present and stated at the bar that during pendency of the instant service appeal, respondents demoted the appellant vide order dated 15.03.2023 as it is not challenge in the instant appeal, therefore, he want to withdraw the instant service appeal with permission to file fresh one and to challenge the demotion order as well. As a token of admission of his submission, he signed the margin of order sheet. Dismissed as withdrawn. Consign.

3. Pronounced in open Court in Peshawar given under our hands and seal of the Tribunal on this 5th day of July, 2023.

R.

(Rashida Bano)
Member (J)

I want to withdraw the instant appeal with the permission to file a fresh.

Kaleemullah

S-7-23

Kaleemullah

Certified to be true copy
 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

Date of Presentation of Application 07/07/23
 Number of ~~Words~~ Page 11
 Copying Fee 55/-
 Urgent 60/-
 Total 60/-
 Name of Copyist Shahid
 Date of Completion of 07/07/23
 Date of Delivery of Copy 07/07/23

The Police Rules, 1975

(With Amendments-2014)

Contents

1. Short title, commencement and application
2. Definitions
3. Grounds of punishment
4. Punishments
- 4.A -
5. Punishment proceeding
6. ngs
7. Procedure of Departmental Inquiry
8. Powers of Inquiry Officer
9. Rules 5 and 6 not to apply in certain cases
10. Procedure of Inquiry against Officers lent to other Government or authority
11. -
12. Appeal
12. Revision (11-A)
13. -
14. Repeal

Police Rules, 1975

[Gazette of Khyber Pakhtunkhwa, Extraordinary, 27th January 1976]

No. SOS-III(S&GAD) 1-80/73-K ---.In exercise of the powers conferred under section 7 of Police Act 1861, the Government of Khyber Pakhtunkhwa, is pleased to make the following Rules, namely:-

1. Short title, commencement and application:-

- (i) These rules may be called the Police Rules, 1975.
- (ii) They shall come into force at once and shall apply to all Police Officers of and below the rank of Deputy Superintendent of Police.

2. Definitions:-

In these rules, unless the context otherwise requires:-

- (i) 'Accused' means a Police Officer against whom action is taken under these rules;
- (ii) 'Authority' means authority competent to award punishment as per Schedule
- (iii) 'Misconduct' means conduct prejudicial to good order of discipline in the Police Force, or contrary to Government Servants (Conduct) Rules or unbecoming of a Police Officer and a gentleman, any commission or omission which violates any of the provisions of law and rules regulating the function and duty of Police Officer to bring or attempt to bring political or other outside influence directly or indirectly to bear on the Government or any

Government Officer in respect of any matter relating to the appointment, promotion, transfer, punishment, retirement or other conditions of service of a Police Officer.

- (iv) 'Punishment' means a punishment which may be imposed under these rules by authority as indicated in Schedule I.

3. **Grounds of punishment.-**

Where a Police Officer, in the opinion of the authority-

- a) Is inefficient or has ceased to be efficient; or
- b) Is guilty of misconduct; or
- c) Is corrupt or may reasonably be considered corrupt because-
- (i) He is or any of his dependents or any other person through him or on his behalf is, in possession (for which he cannot reasonably account) of pecuniary resources of property disproportionate to his known sources of income; or
- (ii) He has assumed a style of living beyond his ostensible means; or
- (iii) He has a persistent reputation of being corrupt; or
- (d) Is engaged Or is reasonably suspected of being engaged in subversive activities, or is reasonably suspected of being associated with others engaged in subversive activities or is guilty of disclosure of official secrets to any unauthorized person, and his retention in service is, therefore, prejudicial to national security, the authority may impose on him one or more punishments.

4. **Punishments.-**

1. The following are the minor and major punishments, namely:--

(a) **Minor punishments-**

- (i) Confinement of Constables and Head Constables for 15 days to Quarter Guards;
- (ii) Censure;
- (iii) Forfeiture of approved service up to 2 years;
- (iv) With holding of promotion up to one year;
- (v) Stoppage of increment for a period not exceeding 3 years with or without cumulative effect;

- ❖ (iv) Fine up to Rs15000/- as per schedule-I.

(b) **Major punishments-**

- (i) Reduction in rank/pay;
- (ii) Compulsory retirement;
- (iii) Removal from service; and
- (iv) Dismissal from service.

2. (a) Removal from service does not but dismissal from service does, disqualify for future employment.
(b) Reversion from an officiating rank is not a punishment.

Amended vide Notification No: 3859/Legal, dated 27/08/2014 issued by IGP, KPK

3. In this rule, removal or dismissal from service does not include the discharge of a person.
- (a) Appointed on probation, during the period of probation, or in accordance with the probation or training rules applicable to him; or
 - (b) Appointed, otherwise than under a contract, to hold a temporary appointment on the expiration of the period of appointment; or
 - (c) Engaged under a contract, in accordance with the terms of the contract.

4-A.

In case a Police Officer is accused of subversion, corruption or misconduct the Competent Authority may require him to proceed on leave or suspend him.

5. Punishment proceedings.

The punishment proceedings will be of two kinds. i.e. (a) Summary Police Proceedings and (b) General Police Proceedings and the following procedure shall be observed when a Police Officer is proceeded against under these rules:---

- (1) When information of misconduct or any act of omission or commission on the part of a Police Officer liable for punishment provided in these rules is received by the authority, the authority, shall examine the information and may conduct or cause to be conducted quick brief inquiry if necessary, for proper evaluation of the information and shall decide whether the misconduct or the act of omission or commission referred to above should be dealt with in a Police Summary Proceedings in the Orderly Room or General Police Proceedings.
- (2) In case the authority decides that the misconduct is to be dealt with in Police Summary Proceedings, he shall proceed as under-
 - (i) The accused officer liable to be dealt with in the Police Summary Proceedings shall be brought before the authority in an Orderly room.
 - (ii) He shall be apprised by the authority orally the nature of the alleged misconduct, etc. The substance of his explanation for the same shall be recorded and if the same is found unsatisfactory, he will be awarded one of the minor punishments mentioned in these rules.
 - (iii) The authority conducting the Police Summary Proceedings may, if deemed necessary, adjourn them for a maximum period of 7 days to procure additional information.
- (3) If the authority decides that the misconduct or act of omission or commission referred to above should be dealt with in General Police Proceedings he shall proceed as under-
 - a) The authority shall determine if in the light of facts of the case or in the interests of justice, a departmental inquiry, through an Inquiry Officer if necessary. If he decides that is not necessary; he shall-
 - b) By order in writing inform the accused of the action proposed to be taken in regard to him and the grounds of the action: and
 - c) Give him a reasonable opportunity of showing cause against that action: Provided

(S)

12.2. Seniority and probation.-- (1) The seniority of Assistant Superintendents of Police is regulated by the orders passed from time to time by the Secretary of State and the Central Government.

No Probationary Assistant Superintendent of Police shall be permanently appointed as an Assistant Superintendent of Police until he has passed the prescribed departmental examinations.

A Probationary Assistant Superintendent of Police who does not qualify by passing these examinations within two years, or at the first examination after two years, from the date of his joining the service, will be removed from Government service; provided that the provincial Government shall have power to relax this rule in special cases, when the Probationary Assistant Superintendent of Police is likely to make a good police officer.

(2) The rules governing the probation and seniority of Deputy Superintendents of Police are contained in Appendix 12-1.

(3) All appointments of enrolled police officers are on probation according to the rules in this chapter applicable to each rank.

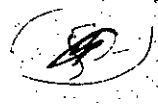
Seniority in the case of upper subordinates, will be reckoned in the first instance from date of first appointment, officers promoted from a lower rank being considered senior to persons appointed direct on the same date, and the seniority of officers appointed direct on the same date being reckoned according to age. Seniority shall, however, be finally settled by dates of confirmation, the seniority inter se of several officers confirmed on the same date being that allotted to them on first appointment. Provided that any officer whose promotion or confirmation is delayed by reason of his being on deputation outside his range or district shall, on being promoted or confirmed, regain the seniority which he originally held vis-à-vis any officers promoted or confirmed before him during his deputation.

The seniority of lower subordinates shall be reckoned from dates of appointment, subject to the conditions of rule 12-24 and provided that a promoted officer shall rank senior to an officer appointed direct to the same rank on the same date.

“Provided that in the case of officers recruited direct after 23rd December, 1958, as a result of the same examination or selection, their inter-se-seniority shall be reckoned.

- (a) by the order of merit fixed by the selection body, and
- (b) when there is no such order by merit indicated, by the age of the candidate, i.e., the oldest being placed the senior-most and the youngest the junior-most”.

[Handwritten signature]



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, by a special order in each case, permit period 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 the period of probation be extended beyond two years and the confirming authority must arrive at a definite decision within a reasonable time soon after the expiry of 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 purpose 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 13-14.

SYNOPSIS

1. *Bad record of service - Denial to promote justified.*
2. *Petitioner not selected for upper school course on the basis of executive instructions being overage.*
3. *Promotion - Confirmation.*
4. *Promotion to officiate on higher post.*
5. *Reduction in rank.*
6. *Reversion to the post of constable without affording an opportunity of being heard.*

Jr
HITES

بعد الت خیر کھنڈ خواہ کروس ڈیپوزٹل کٹیا در

B-c-09-1869
CNIC No 16101-3895803-
Mobi: 0300-5877743

بنام صوبائی حکومت
و عتیقہ

رحمت اللہ

سروس ایپیل

مدرجہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنک

بالی گورنمنٹ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام ~~ایستاد~~ کیلئے ~~طائف خدایک سہمی ایڈووکیٹ~~
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ درجہ جانا التوا نے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

المرقوم 8 _____ ہ مجلدی 2023

Abdullah

دستخط / رحمت اللہ ایبٹ آباد

Accepted کے لئے منظور ہے۔

لکھنؤ

بمقام

(Signature)

8/7/2023