

FORM OF ORDER SHEET

Court of _____

Appeal No.

1547/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/07/2023	The appeal of Mr. Riaz Ullah presented today by Mr. Muhammad Arif Jan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 31-07-2023 .

By the order of Chairman:



REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 1547 /2023.

Riazullah Khan ASI MR NO-729.....Appellant


VERSUS

District Police Officer, Nowshera and others

.....Respondents

I N D E X

S.No.	Description of documents.	Annexure	Pages
1.	Memo of appeal.		1-5.
2.	Affidavit		6
3.	Addresses of parties		7
4.	Copy of Intermediate Examination list	A	8-15
5.	Copies of letter dated 05-07-2019 along with some other necessary documents	B	16-19
6.	Copy of departmental appeal	C	20
7.	Wakalatnama		21.

Appellant
Through 
Muhammad Arif Jan
Advocate High Court
Cell: 0333-2212213

Dated: 13.7.2023

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1547 /2023

Riazullah Khan ASI MR N0-729

District Police Nowshera.....Appellant

VERSUS

1. District Police Officer, Nowshera.
2. Additional Inspector General of Police, Police Headquarters, Police Line, Peshawar.
3. Additional Inspector General of Police Establishment, Police Headquarters, Police Line, Peshawar.
4. Deputy Inspector General Police Region Mardan, District Mardan.
5. Inspector General of Police, Police Headquarters, Police Line, Peshawar.

.....Respondents

**APPEAL U/S-4 OF KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974.**

Respectfully Sheweth:-

Appellant humbly submits as under

1. That the appellant was initially appointed as Police Constable on 27-01-1990 in the Police Department, District, Nowshera and is serving the department with full zeal and zest and to the entire satisfaction of his superiors.
2. That the appellant did passed Lower Examination from PTC Hangu and then was promoted as Head Constable.
3. That in the year, 2012 the appellant did passed Intermediate

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Examination and then was promoted as ASI on 15-04-2014 and was confirmed as ASI in the year, 2017. (Copy of intermediate examination list is attached as Annex-A) ✓

4. That the appellant also did passed Upper Course Examination in the year, 2022 however the appellant being qualified, eligible and entitled in all respect has been deprived and ignored from his right of promotion thus the appellant along with some other officers (ASI's) immediately filed joint application before respondent No-3 which was finally decided vide letter number 9549-54 dated 05-07-2019 passed by respondent No-3 after getting some legal opinion/guidance from AIG, Legal and the appellant along with some other aggrieved were given their inter-se seniority with their Colleagues with whom they underwent Intermediate Examination Course. (Copies of letter dated 05-07-2019 along with some other necessary documents are attached as ANNEX-B).
5. That it is worth mentioned here that despite the letter ibid and all other facts pertains to the seniority, requisite criteria, ACR in the light of Standing Order and fulfillments of requirements courses number ie 09, the appellant have been ignored and deprived from promotion and confirmation by the respondents.
6. That the appellant being qualified, eligible and entitled for Upper College Course Training was sent to PTC, Hangu in the year, 2022 being ASI, but it is to be added that no doubt the appellant has been given the seniority with his colleagues but his other colleagues have been promoted as SI's and were sent for training ibid.
8. That the department was required to promoted and confirmed the appellant with his batch mates/colleagues for enabling him to meet the requirement/necessary trainings/courses/period for enlistment "List-F" but the department badly failed and junior then the appellant were given chance for completion of the requirements of list-F thus the appellant being aggrieved filed an departmental representation before

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respondent No-3 but of no avail hence the instant appeal on the following amongst other grounds; (Copies of departmental appeal along with letter dated 06-04-2023 are attached as ANNEX-~~B~~ C)

GROUNDS;

- A. Because, the act, commission and omission of the respondents by way of ignoring and depriving the appellant from his due right of promotion and confirmation to the rank of Sub-Inspector and further from all necessary completion of period towards enlistment in list 'F' are illegal, unlawful, without lawful authority, of no legal effect and also against the law, rules and regulations governing the subject matter.
- B. Because, the appellant has been discriminated as the other colleagues and even junior then the appellant were given promotion and confirmation to the rank of Sub-Inspector, but the appellant has been deprived for no any good reason and justification.
- C. Because, under Examination Rules, 1950, the eligibility for promotion has been settled and the competent authority has the discretion to relax some condition which were extended to the other colleagues of the appellant.
- D. Because, the respondents are bound down under the law to hold DPC twice a year, but in the case in hand, no DPC held since the year, 2019 which badly affected the appellant along with other colleagues who all are due for promotions and confirmations which is no fault of individual rather it is/was the responsibility of the department.
- E. Because, the appellant earned good name amongst other colleagues which is evident from the unblemished service record of the appellant and there is/was no any inquiry or complaint whatsoever pending or decided against the appellant hence the non holding of DPC and further depriving the appellant from promotion and other service benefits is nothing, but just to harass and humiliate the appellant from

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his due right of promotion.

- F. Because, if this time too, the appellant has not been promoted/confirmed as Sub-Inspector and subsequently not placed in list 'F', then the appellant will suffer with irreparable losses which will not be count in shape of coins for the reason as the other colleagues of the appellant getting handsome service benefits also towards pension, but the appellant likely to be retire as ASI's which is unjust and unfair and discrimination.
- G. That any other ground which has not been mentioned may also be permitted to rise at the time of hearing.

It is, therefore, most humbly prayed that on acceptance of the instant appeal,

- i. Direct the respondents to promote and confirm the appellant as Sub-Inspector from his due date by way of holding special DPC with all back benefits.
- ii. Respondents be further directed to comply with the letter dated 05-03-2019 pertains to the seniority of the appellant and extend benefits the same to the appellant with his batch mates/colleagues with all back benefits.
- iii. Direct the respondents to place the name of appellant in List "F" being qualified and if there is some deficiencies, the same may kindly be exempt and relax including the required period which is no fault of the appellant.
- iv. In alternate conditional order may graciously be pass for enlisting the appellant in List "F" and further posted him to enable to complete/fulfill the requirements of List "F" towards further promotion as Inspector with all ancillary benefits.
- v. Any other remedy which has not been specifically asked for and is fit in the circumstance may also be allowed in favor of appellant

against the respondents.

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Riazullah

Appellant

Through

MAJ

Muhammad Arif Jan
Advocate High Court.

Certificate.

It is certified that no such like appeal has earlier been filed before this hon'ble Tribunal.

Riazullah

Deponent

ATTESTED
JUDGE COURT

[Signature]
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Riazullah Khan ASI MR N0-729.....Appellant

VERSUS

District Police Officer, Nowshera and others

.....Respondents

AFFIDAVIT

I, Riazullah Khan ASI MR N0-729 District Police Nowshera do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

ATTESTED
Gul Durr Khan
14/11/23

Riazullah Khan
DEPONENT

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Riazullah Khan ASI MR N0-729Appellant

VERSUS

District Police Officer, Nowshera and others
.....Respondents

ADDRESSES OF PARTIES

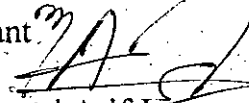
APPELLANT

Riazullah Khan ASI MR N0-729 District Police Nowshera

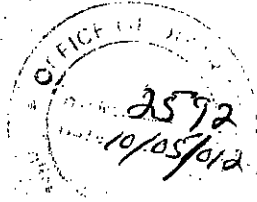
RESPONDENTS

1. District Police Officer, Nowshera.
2. Additional Inspector General of Police, Police Headquarters, Police Line, Peshawar.
3. Additional Inspector General of Police Establishment, Police Headquarters, Police Line, Peshawar.
4. Deputy Inspector General Police Region Mardan, District Mardan.
5. Inspector General of Police, Police Headquarters, Police Line, Peshawar.

.....Respondents

Appellant
Through 
Muhammad Arif Jan
Advocate High Court,

Annex 'A' (8)



Ph # 0925-621886
Fax # 0925-623236

Office of the Commandant, Police Training College, Hangu.

FOR PUBLICATION IN KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II ORDERS
BY THE COMMANDANT POLICE TRAINING COLLEGE HANGU.

NOTIFICATION

Dated 02-05-2012.

No. 1242 /S/RESULT: The result of the following officers, of your Distt./Units, who appeared in the final examinations of Intermediate College Course, held at PTC Hangu, for the term ending 20.03.2012, is hereby announced and given below. Their Order of Merit is noted against each. The original Performance Reports, of the passed candidates shall be issued & sent separately.

S/No.	Comp#	Name	Belt#	Distt./Unit	Merit No.
1	I-861	Ali Said	198	Swabi	1
2	I-859	Muhammad Naeem	732	Swabi	2
3	I-892	Mushtaq Ahmad	926	Mardan	3
4	I-797	Jan Nisar	290	Manshara	3
5	I-890	Tariq Khan	4438	Swat	4
6	I-889	Muhammad Hamayoun	745	Manshara	4
7	I-862	Aurangzeb	1325	Mardan	5
8	I-849	Shafi Ullah	152	Karak	6
9	I-864	Khalid Khan	260	Buner	7
10	I-796	Shahid Khan	10	Nowshera	8 ✓
11	I-877	Atta Ur Rehman	156/69	Mardan	9
12	I-860	Said Mukhtar	281	Buner	10
13	I-790	Syed Rehman	516	Kohistan	11
Re-appeared ex-term ending 20.09.2010. Declared Passed					
14	I-345	Saad Ullah Khan	472	Bannu	12
Term Ending 20.03.2012					
15	I-848	Muhammad Saqlain	943	D.I Khan	13
16	I-824	Fazal Subhan	242	Swat	14
17	I-885	Said Ul Amin	196	Swabi	15
18	I-792	Gul Muhammad	139	Chitral	16
19	I-901	Karam Elahi	1067	D.I Khan	17
20	I-800	Fazal Manan	19	Haripur	18
21	I-838	Fazal Wahab	1046	Swat	18
Re-appeared ex-term ending 20.09.2011. Declared Passed					
22	I-628	Umar Saqlain	941	Bannu	19

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S/No.	Comp#	Name	Belt#	Distt:/Unit	Merit No.
Term Ending 20.03.2012					
23	I-899	Ibrahim Shah	235	Chitral	20
24	I-805	Habib Ullah	765	Bannu	20
25	I-794	Muhammad Zahid Ali	801	D.I Khan	20
26	I-869	Ayaz Ali	234	Mardan	21
27	I-850	Muhammad Zahir	112	Battagram	22
28	I-897	Noor Muhammad	4384	CCP Pesh:	23
29	I-786	Ulfat Hussain	15	Kohat	24
30	I-902	Murad Ali	640	Nowshera	25 ✓
31	I-833	Nasir Ali	1132	Charsadda	26
32	I-754	Rehman Ullah	439	Kohistan	27
33	I-750	Asmat Ullah	414	Lakki Marwat	28
34	I-844	Umar Wahab	1053	Swat	29
35	I-870	Muhammad Saeed	1876	CCP Pesh:	30
36	I-896	Muhammad Ayub	4374	CCP Pesh:	30
37	I-857	Ali Akbar	881	Mardan	31
38	I-816	Liaqat Ali	96	Shangla	32
39	I-845	Muhammad Uzair	211	Swat	33
40	I-925	Muhammad Syed Khan	163	Shangla	34
41	I-837	Muhammad Zaib	3179	Swat	35
42	I-880	Fazal Daud	865	Mardan	36
43	I-840	Usman Zada	365	Swat	37
44	I-884	Waheed Khan	382	Haripur	38
Re-appeared ex-term ending 20.09.2011. Declared Passed					
45	I-594	Muhammad Rustam	16	Abbottabad	38
Term Ending 20.03.2012					
46	I-851	Mureed Abbas	311	D.I Khan	39
47	I-769	Saeed Wazir	49	Shangla	40
48	I-834	Saif Ur Rehman	78	Kohat	41
49	I-826	Syed Iqbal Shah	151	Battagram	41
50	I-874	Fazal Khaliq	354	Mardan	42
51	I-876	Nizam Gul	537	Kohat	43
52	I-855	Faheem Ullah	834	Kohat	44
53	I-921	Naimat Ullah	939	Bannu	45
54	I-926	Shaheen Akbar	498	Mansehra	46
55	I-827	Ajmair Shah	841	Charsadda	47
56	I-814	Farhad Ali	58	Mardan	48
Re-appeared ex-term ending 20.09.2011. Declared Passed					
57	I-647	Ziad Ullah	947	Charsadda	48

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S/No.	Comp#	Name	Belt#	Distt:/Unit	Merit No.
Term Ending 20.03.2012					
58	I-766	Kameen Khan	264	Mardan	49
59	I-927	Ihsan Ullah	611/441	Bannu	49
60	I-887	Fateh Zada	151	Shangla	50
61	I-829	Fazal Subhan	1094	Swat	51
62	I-878	Zarullah	1128	CCP Pesh:	52
63	I-798	Azam Khan	308	Haripur	53
64	I-803	Jehangir	645	Bannu	54
65	I-822	Muhammad Aman	1162	Swat	55
66	I-756	Luqman Khan	997	Dir Lower	56
67	I-924	Apil Jan	1082	Charsadda	56
Re-appeared ex-term ending 20.03.2011. Declared Passed					
68	I-431	Farzand Ali	295	Lakki Marwat	57
Term Ending 20.03.2012					
69	I-888	Abdul Sattar	433	CCP Pesh:	58
70	I-772	Shah Nawaz	821	D.I Khan	59
71	I-810	Wali Khan	4382	CCP Pesh:	59
Re-appeared ex-term ending 20.09.2011. Declared Passed					
72	I-655	Mutahir Shah	3775	CCP Pesh:	60
Term Ending 20.03.2012					
73	I-900	Intiaz Khan	1584	Mardan	61
74	I-912	Niaz Muhammad	741	Mansehra	62
75	I-789	Muhammad Ayaz	107	CCP Pesh:	63
76	I-873	Muhammad Jamil	557	Dir Lower	64
77	I-916	Fazal Ur Rehman	13	CPC Pesh:	64
78	I-765	Fazal Wahid	899/542	Charsadda	65
79	I-872	Noor Ghani	297	Dir Lower	66
80	I-879	Muhammad Khan	851	Karak	67
81	I-841	Ayaz Ahmad	981	Swat	68
82	I-775	Muhammad Daud	206	Bannu	69
Re-appeared ex-term ending 20.09.2011. Declared Passed					
83	I-630	Muhammad Waheed	77	Mansehra	70
Term Ending 20.03.2012					
84	I-923	Hidayat Shah	539	Nowshera	71 ✓
85	I-853	Waqif Khan	600	Swabi	72
86	I-785	Sana Gul	258	Buner	73
87	I-854	Sarfraz Khan	524	Swat	74
88	I-846	Hassan Gul	4051	CCP Pesh:	75
89	I-757	Said Wali	53	CCP Pesh:	76
90	I-780	Ali Asad Ullah	27	CCP Pesh:	77

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Comp#	Name	Belt#	Distt:/Unit	Merit No.
I-761	Mushtaq Ahmad	13	Mansehra	78
I-875	Noor Da Alam	127	Hangu	79
I-843	Mustaqeem Shah	173	Swat	80
I-768	Muhammad Naeem	3248	CCP Pesh:	80
I-776	Khan Muhammad	112	Swabi	81
I-811	Faiz Ur Rehman	854	Chitral	82
I-801	Khurshid Khan	253	Abbottabad	83
I-817	Abdur Rauf	275	Dir Lower	84
I-788	Arshad Iqbal	35	CCP Pesh:	85
I-758	Muhammad Ali	3954	CCP Pesh:	85
I-881	Gul Baz	653	Abbottabad	86
I-806	Noor Islam	23	Dir Upper	87
I-895	Sher Khan	200	CCP Pesh:	88
I-813	Hayat Ullah	630	D.I Khan	89
I-908	Ijaz Ahmad	1841	CCP Pesh:	90
I-819	Akhtar Ullah	722	Kohat	90
I-791	Sana Ullah	406	D.I Khan	91
I-858	Ahmad Yar	486	Karak	92
I-784	Jamal Akhtar	740	Abbottabad	93
I-787	Abdur Rasheed	147	Bannu	94

Re-appeared ex-term ending 20.09.2011. Declared Passed

111	I-745	Said Muhammad	2069	CCP Pesh:	95
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Term Ending 20.03.2012

112	I-906	Farooq Hussain	823	Mardan	96
113	I-799	Qasim Khan	203	Swabi	97
114	I-825	Moin Khan	32	CCP Pesh:	98
115	I-762	Kaleem Ullah	233	CPC Pesh:	99
116	I-917	Abdur Razzaq	713	Abbottabad	100
117	I-909	Naseeb Ur Rehman	3454	CCP Pesh:	100

Re-appeared ex-term ending 20.03.2011. Declared Passed

118	I-465	Nawab Khan	98	Lakki Marwat	101
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Term Ending 20.03.2012

119	I-832	Aqal Din	114	Lakki Marwat	102
120	I-755	Imdad Ullah Khan	3708	CCP Pesh:	103
121	I-835	Ali Khan	126	Charsadda	104

Re-appeared ex-term ending 20.09.2011. Declared Passed

122	I-592	Sabir Hussain	1850	CCP Pesh:	105
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Term Ending 20.03.2012

123	I-918	Yar Badshah	774	Nowshera	106
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Comp#	Name	Belt#	Distt:/Unit	Merit No.
I-804	Qaisar Khan	907	Charsadda	107
I-821	Amjad Ali	2104	CCP Pesh:	108
I-770	Hamayoun Khan	140	Dir Upper	109
I-894	Noor Ul Islam	1106/29	Mardan	110
I-760	Maqsood Elahi	1727/137	CCP Pesh:	111
I-868	Gharib Ullah	3318	CCP Pesh:	112
I-898	Raaz Muhammad	233	Buner	112
I-903	Javed Ahmad	1292	Mardan	113
Re-appeared ex-term ending 20.09.2011. Declared Passed				
I-603	Syed Dilbar Ali Shah	31	Mansehra	114
I-690	Muhammad Haleem	256	Buner	115
Term Ending 20.03.2012				
I-905	Imdad Khan	4067	CCP Pesh:	116
Re-appeared ex-term ending 20.09.2011. Declared Passed				
I-729	Rustam Khan	38	Kohat	117
Term Ending 20.03.2012				
I-771	Bakhtiar	1061	Dir Lower	118
I-913	Muhammad Hanif	43	Honza Nagar	119
I-782	Sher Alam	299	Buner	120
I-777	Amil Jan	134	Hangu	121
Re-appeared ex-term ending 20.09.2011. Declared Passed				
I-601	Sajid Khan	482	CCP Pesh:	122
Term Ending 20.03.2012				
I-793	Lal Badshah	968	Charsadda	123
Re-appeared ex-term ending 20.09.2011. Declared Passed				
I-642	Mahaz Ali	53	CPC Peshawar	124
Term Ending 20.03.2012				
I-836	Muhammad Riaz	434	Kohat	125
Re-appeared ex-term ending 20.09.2011. Declared Passed				
I-696	Sher Muhammad	240	Tank	126
I-734	Hamayoun	162	Shangla	127
I-663	Mazhar Ali Shah	87	Shangla	128
Term Ending 20.03.2012				
I-911	Muhammad Rehman	224	Swat	129
I-779	Aurangzeb	4068	CCP Pesh:	129
I-753	Rahim Dil	103	Tank	130
I-904	Riaz Ullah	804	Nowshera	130 ✓
I-783	Abdul Aziz	112	Shangla	131
I-882	Khaista Rehman	998	Dir Lower	132

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Comp#	Name	Belt#	Distt:/Unit	Merit No.	
I-831	Kaleem Ullah	121	Lakki Marwat	133	
I-774	Khaista Rehman	142	Dir Upper	134	
Re-appeared ex-term ending 20.09.2011. Declared Passed					
I-596	Zafar Hayat	1245	CCP Pesh:	134	
Term Ending 20.03.2012					
I-759	Seraj Ud Din	446	Chitral	135	
I-812	Inayat Khan	245	Dir Lower	136	
I-828	Ameen Ul Wahab	1046	Dir Lower	137	
Re-appeared ex-term ending 20.09.2011. Declared Passed					
159	Nil	Muhammad Ayaz	1823	CCP Pesh:	138
Term Ending 20.03.2012					
160	I-920	Khair Ul Akbar	471	Dir Upper	139
161	I-922	Shah Said	521	Swat	140
Re-appeared ex-term ending 20.09.2011. Declared Passed					
162	I-700	Anees Ahmad	198	Mardan	141
Term Ending 20.03.2012					
163	I-863	Hazrat Hussain	1452	Dir Lower	142
164	I-910	Gulzar Ali	2424	CCP Pesh:	143
165	I-795	Saif Ul Islam	1054	Mardan	144
166	I-773	Khalil Ullah	391	Chitral	145
167	I-866	Sher Rehman	2360	CCP Pesh:	146
Re-appeared ex-term ending 20.09.2011. Declared Passed					
168	I-703	Muhammad Saqlain	827	D.I Khan	147
Term Ending 20.03.2012					
169	I-914	Abdul Sahib	34	Gilgit	148
170	I-767	Bashir Muhammad	96	Mardan	149
171	I-807	Muhammad Jamil	669	Bannu	150
Re-appeared ex-term ending 20.09.2011. Declared Passed					
172	I-665	Muhammad Asad	99	Kohistan	151
173	I-713	Imtiaz Ahmad	395	Haripur	152
Term Ending 20.03.2012					
174	I-781	Rad Ali Khan	220	Buner	153
Re-appeared ex-term ending 20.09.2011. Declared Passed					
175	I-616	Umer Ali	308	Hangu	154
Term Ending 20.03.2012					
176	I-867	Jangi Bahadar	142	ARP Gilgit	155
177	I-808	Abdul Majeed	57	Gilgit	156
178	I-778	Zafar Jan	14	Gilgit	157
Re-appeared ex-term ending 20.09.2011. Declared Passed					
179	I-641	Khair Ul Rehman	978	Dir Lower	158

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S.No. Comp# Name Belt# Distt:/Unit Merit No.

Term Ending 20.03.2012

180	I-830	Shoukat Zaman	232	Abbottabad	159
181	I-842	Qadir Majeed	37	Skardo	160

Re-appeared ex-term ending 20.09.2011. Declared Passed

182	I-675	Waqar Ahmad	674	Chitral	161
183	I-621	Asfandyar	359	Dir Lower	162

Term Ending 20.03.2012

184	I-871	Syed Mizahir	13	Ghanchi	163
185	I-915	Fida Hussain	84	Skardo	164

Re-appeared ex-term ending 20.09.2011. Declared Passed

186	I-708	Umar Hayat	522	Swabi	165
187	I-634	Muhammad Noor	202/634	Bannu	166

Term Ending 20.03.2012

188	I-752	Muhammad Jamal	481	Bannu	167
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Awarded Grace Marks Declared Passed.

189	I-802	Abdul Qadeer Khan	17	Haripur	168
190	I-893	Arab Khan	158	Hangu	168
191	I-751	Syed Rasool Shah	2096	CCP Pesh:	169
192	I-839	Zahid Ullah	147	CPC Pesh:	170
193	I-847	Muhammad Shafiq	107	Tank	171
194	I-764	Muhammad Saeed	19	Gilgit Biltistan	172
195	I-820	Abdullah	437	Kohistan	173
196	I-763	Saeed Ullah	4137	CCP Pesh:	174
197	I-919	Gulzar ali	318	Lakki Marwat	175
198	I-823	Yousaf Khan	82	CCP Pesh:	176
199	I-815	Saleem Khan	768	Abbottabad	177
200	I-818	Sher Hayat Khan	173	Dir Upper	178
201	I-883	Akhtar Munir	708	Swabi	179
202	I-907	Ghani Ur Rehman	288	Dir Upper	180

Failed term ending 20.03.2012.

S.No	Comp#	Name	Belt No:	Enlstt: District	Failed Subject
203	I-865	Gohar Ali	3450	CCP Pesh:	PPWP
204	I-852	Ghulam Hussain	56	Gilgit	PPC
205	I-886	Muhammad Ibrahim	1295	Bannu	P.R

Un-Qualified

206	I-809	Abdul Saeed	600 Kohistan	Returned to the district Vide OB	
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No.271 Dated:26.03.2012, due to his absence

(15)

I-856 Nawab Ali 388 Karak Returned to the district Vide OB
No. 727 Dated: 18.10.2011,
208 I-891 Mukhtiar Khan 3322 CCP Pesh: Returned to the district Vide OB
NO.904 Dated: 16.11.2011, due to his illness

Abdul Waheed Khan P.S.O
Commandant,

No. 1243-82 /S, dated Hangu, the 02-02-2012

Copy of above is submitted for information and necessary action to:

1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. The Inspector General of Police, Gilgit Biltistan at Gilgit.
3. The Addl. IGP Investigation, Khyber Pakhtunkhwa, Peshawar, for publication in Police Gazette Part- II.
4. The Capital City Police Officer, Peshawar.
5. The DIsG of Police, Bannu, D.I Khan, Mardan, Malakand, Hazara and Kohat, Regions.
6. The Director, Campus Peace Corps at University of Peshawar.
7. The District Police Officers, Abbottabad, Bannu, Buner, Battagram, Charsadda, Chitral, D I Khan, Dir Lower, Dir Upper, Haripur, Hangu, Karak, Kohat, Kohistan, Lakki, Mansehra, Mardan, Nowshera, Shangla, Swabi, Swat and Tank.
8. The Sr: Superintendents of Police, Districts, Gilgit, ARP Gilgit, Skardo, Honza Nagar, & Ghanchi.

Qus

Prepared by Incharge Secrecy.

Checked and found correct.

Ans

Controller of Examinations.

Abdul Waheed Khan

Abdul Waheed Khan P.S.O
Commandant,

by

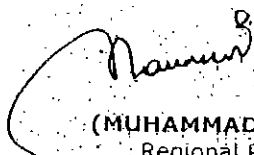
Annex B
16

10

ORDER

Consequent upon the decision made in the Departmental Promotion Committee meeting held in this office on 18.06.2019 under the Chairmanship of the undersigned, the following ASIs are hereby accorded Inter-se Seniority with their Colleagues with whom they underwent Intermediate College Course as per orders of merit issued by Police Training College Hangu.

S. No.	Name & No.	Place of Posting	Date of Qualified Intermediate College Course	Order of merit of Intermediate College Course
1.	ASI Nasir Khan No. 726/MR	CTD KPK	20.03.2011	124
2.	ASI Mr. Akbar Khan No. 733/MR	Nowshera District	20.09.2011	11
3.	ASI Iftikhar Hussain No. 734/MR	Nowshera District	20.09.2011	27
4.	ASI Said Nabi Shah No. 787/MR	Nowshera District	20.09.2011	83
5.	ASI Shehbaz Khan No. 788/MR	Nowshera District	20.03.2012	08
6.	ASI Hidayat Shah No. 727/MR	ACE KPK	20.03.2012	71
7.	ASI Yar Badshah No. 728/MR	Nowshera District	20.03.2012	106
8.	ASI Riaz Ullah No. 729/MR	Nowshera District	20.03.2012	130
9.	ASI Javid Khan No. 780/MR	Elite Force KPK	20.09.2012	21
10.	ASI Saleem Khan No. 781/MR	Traffic Peshawar	20.03.2013	145
11.	ASI Kifayat Ullah 730/MR	Nowshera District	20.09.2013	156
12.	ASI Tahir Zameer No. 731/MR	National Highways & Motorway Police	20.09.2013	161
13.	ASI Marjan Ali No. 732/MR	National Highways & Motorway Police	20.09.2013	190


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

No. 7549-54/ES.

Dated Mardan the 05/07/2019.

1. Copy forwarded for information and necessary action to the:-
2. Deputy Inspector-General of Police CTD Khyber Pakhtunkhwa, Peshawar.
3. DIG/Commandant National Highways & Motorway Police Training College, Sneikhpura.
4. Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
5. District Police Officer, Nowshera.
6. Chief Traffic Officer, Peshawar
7. Assistant Director Anti Corruption Establishment Nowshera Range.
(*****)



17

21-1-19

OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA

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

2019
234
25-1-19

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

No. 992 /EC, Dated Nowshera the 24-1 /2019.

Subject: APPLICATION

Memo: Enclosed kindly find herewith self explanatory applications submitted by the following ASIs of this District Police for favor of consideration, please.

1. ASI Mir Akbar Khan
2. ASI Said Nabi Shah
3. ASI Shahid Khan
4. ASI Riaz-Ullah.

Encl: (Applications)

District Police Officer,
Nowshera

NO. 1112/ESI/D/107/02
2019

En: (18 Pages)

EC / Insp: by NSR.

For action/comments

Mamun
RPO/Mardan
23/1/19

Disp: Legal

OFFICE OF DISTRICT POLICE
941
DATE: 11/2/19

ATTACHED

Amir
bpo NSR
8-2

18

19/03/01 15:09

(FAX)

P.001/001

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

No. 1011 /Legal dated Peshawar, the 29/02 /2019.

To: The District Police Officer,
Nowshera.

Subject: GUIDANCE/ LEGAL OPINION

Memo: Please refer to your office letter No.35/legal dated 19.02.2019 on the subject cited above.

The seniority of applicants may not be disturbed due to attachment & detachment of District Nowshera from one Region to other Region.

~~The were entitled to seniority as per merit list of P.T.C. Hangu results of lower school course and intermediate school course.~~

AIG/Legal,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

[Handwritten mark]



OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA

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

2019

To,

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

No. 2724 IEC dated Nowshera the 05-3- /2019.

Subject: APPLICATION

Memo:

Kindly refer to your office Endst: No. 884/ES, dated 29-01-2019, Endst: No. 1112/ES, dated 07-02-2019 and Endst: 1623/ES, dated 22-02-2019, regarding the applications submitted by ASI Mir Akbar and 05 others.

It is submitted that through the above quoted references, the afore-referred applicants alleged that due to detachment of District Nowshera from Capital City Police, Peshawar and its attachment with Mardan Region twice resulted in their seniority issue, hence, requested that they may be accorded seniority as per Intermediate College Course.

Therefore, the matter in issue was referred to Assistant Inspector General of Police, Legal, Khyber Pakhtunkhwa, Peshawar vide this office letter No. 35/Legal, dated 19-02-2019 for seeking legal guidance. The Assistant Inspector General of Police, Legal, Khyber Pakhtunkhwa, Peshawar vide his office letter No. 1011/Legal, dated 28-02-2019, has opined that applicants are entitled to their seniority as per merit list of P.T.C. Hangu results of Lower School Course and Intermediate College Course. (Copy attached).

Submitted please.

District Police Officer,
Nowshera

ATTACHED

Annex - 5

20

جناب عالی!

گزارش ہے کہ سائل نے سال 2011 کے پہلے ٹرم میں انٹرمیڈیٹ کورس پاس کیا ہے اور مورخہ 15.04.2014 کو مردان ریجن سے ASI رینک پر کنفرمیشن حاصل کی ہے، بعدہ سائل کو معلوم ہوا کہ مردان ریجن آفس میں سائل سے جو نمبر افسران کو SI ترقیاب کیا گیا ہے، اندر میں بارہ سائل نے آپ جناب کو تحریری درخواست پیش کر کے جو آپ صاحبان نے منظور فرما کر بحوالہ آرڈر انگریزی نمبر 9549-54/ES مورخہ 05.07.2019 سائل کو اپنی سینیاریٹی پر بحال کیا، اور اسی سینیاریٹی پر سائل کو مورخہ 03.06.2021 کو PTC ہنگو میں شروع ہونے والے اپر کالج کورس میں شامل کیا گیا۔ SI اختر حسین متعینہ انوسٹی گیشن ضلع نوشہرہ، SI رضاء خان متعینہ انوسٹی گیشن ضلع نوشہرہ، SI غفار علی متعینہ انوسٹی گیشن ضلع نوشہرہ، SI عالمگیر خان متعینہ SHO ضلع چارسدہ، جو کہ سائل کے انٹرمیڈیٹ کورس کے بیچ میٹس ہیں اور کورس نتائج کے مطابق سائل سے جو نمبر ہیں، نے نہ صرف سائل سے جو نمبر ہونے کے باوجود ترقی حاصل کی ہے بلکہ مختلف تھانہ جات میں اپنے پیرڈز بھی مکمل کر لئے ہیں اور اب وہ انسپکٹر رینک پر ترقیاب ہونے کو ہیں، جبکہ تاحال سائل کو SI رینک پر ترقی بھی نہیں دی گئی، جو کہ سائل کو اپنے ساتھ انتہائی نا انصافی لگ رہی ہے۔ سائل نے حسب الحکم افسران بالا صاحبان ایلٹ جو نمبر کمانڈ کورس و دیگر محکمانہ کورسز مختلف پولیس سکولوں سے بروقت مکمل کر کے سرٹیفیکیٹ ہائے لف درخواست ہڈا ہیں۔ درج بالا افسران سائل کے محکمانہ بھائی ہیں جن کی ترقی پر سائل کو کوئی شکایت نہ ہے، البتہ سائل اپنی اصل سینیاریٹی پر ترقی پانے کا خواہاں ہے۔

بذریعہ درخواست سائل انتہائی عاجزانہ استدعا کرتا ہے کہ جملہ حقائق کو مد نظر رکھتے ہوئے سائل کو اپنے

کو لیگز انچ میٹس کے ساتھ سینیاریٹی اور ترقی دی جاوے۔

سائل آپ جناب کی اقبال بلندی کے لئے تا عمر دُعا گو رہے گا۔

ریاض اللہ خان

729 ASI

العارض

(21) (43)

WAKALATNAWA

VERSUS

DPO 3 o/w

Defendant(s)
Respondent(s)
Accused(s)

By this, power-of-attorney I/we the said Appellant in the above case, do hereby constitute and appoint **MUHAMMAD ARIF JAN** Advocate as my attorney for me/us in my/our name and on my/our behalf to appear, plead, give statement, verify, administer oath and do all lawful act and things in connection with the said case on my/our behalf or with the execution of any decree or order passed in the case in my/our favour/ against which I/we shall be entitled or permitted to do myself/ourselves, and, in particular, shall be entitled to withdraw or compromise the case or refer it to arbitration or to agree to abide by the special oath of any person and to withdraw and receive documents and money from the Court or the opposite party and to sign proper receipts and discharges for the same and to engage and appoint any other pleader or pay him as his fee irrespective of my/our success or failure in case, provided that, if the case is heard at anyplace other than the usual place of sitting of the Court the pleader shall not bound to attend except on my agreeing to pay him a special fee to be settled between us.

Signature of Client
[Signature]

Accepted
[Signature]

Muhammad Arif Jan
Advocate High Court
Peshawar
Office No.210, Mumtaz Plaza
G.T Road, Hashtnagri Stop,
Peshawar City.
CNIC No.17201-2275748-7
Bc No.10-6663
Cell: 0333-2212213