

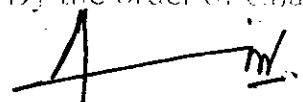
FORM OF ORDER SHEET

Court of _____

Appeal No. 1543/2023

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. Said Nabi presented today by Mr. Muhammad Arif Jan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>31-07-2023</u>

By the order of Chairman



REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1543/2023


Said Nabi Shah ASI MR No-787Appellant

VERSUS

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

I N D E X

S.No.	Description of documents.	Annexure	Pages
1.	Memo of appeal.		1-6
2.	Affidavit		7
3.	Addresses of parties		8
4.	Copy of Intermediate Examination list	A	9-15
5.	Copies of letter dated 05-07-2019 along with some other necessary documents	B	16-19
6.	Copy of letter dated 03-06-2021	C	20
7.	Copy of departmental appeal	D	21
8.	Wakalatnama		22

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

Dated: 7.2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1543 /2023

Said Nabi Shah ASI MR No-787 at Police Post Khoeshgi

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 29-06-1993 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 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 came to know that some of his batch mates and even junior then the appellant were promoted as Sub-Inspectors and the appellant being qualified, eligible and entitled in all respect was kept 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.

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6. That the appellant being qualified, eligible and entitled for Upper College Course Training was sent to PTC, Hangu on 03-06-2021 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*. **(Copy of letter dated 03-06-2021 is attached as ANNEX-C).**
8. That the department was required to promote and confirm 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 a departmental representation before respondent No-3 but of no avail hence the instant appeal on the following amongst other grounds; **(Copy of departmental appeal is attached as ANNEX-D).**

GROUNDING;

- A. Because, the act, commission and omission of the respondents by way of ignoring and depriving the appellant (hereinafter impugned) 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

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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 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

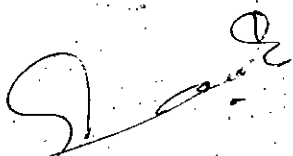
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permitted to rise at the time of hearing.

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

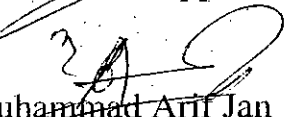
- i. Declare the act commission and omission of respondents of non holding DPC in respect of appellant as illegal, unlawful and direct the respondents to promote and confirm the appellant as Sub-Inspector from his due date by way of holding special DPC with all back benefits.
- ii. Respondents further be directed to comply/implement 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 are 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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Appellant

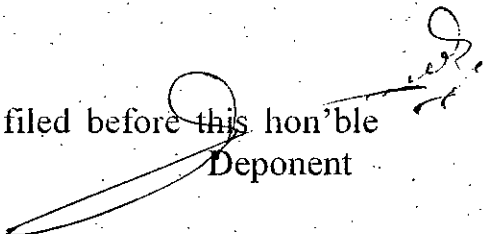
Through



Muhammad Arif Jan
Advocate High Court.

Certificate.

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



Deponent

(6) (7)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Said Nabi Shah ASI MR No-787Appellant

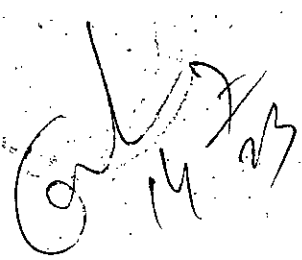
VERSUS

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

AFFIDAVIT

I, Said Nabi Shah ASI MR No-787 at Police Check Post Khoeshgi 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.


DEPONENT


14/11/23



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Said Nabi Shah ASI MR No-787Appellant

VERSUS

District Police Officer, Nowshera and othersRespondents

ADDRESSES OF PARTIES

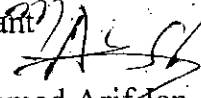
APPELLANT

Said Nabi Shah ASI MR No-787 at Police Check Post Khoeshgi District Police
Nowshera

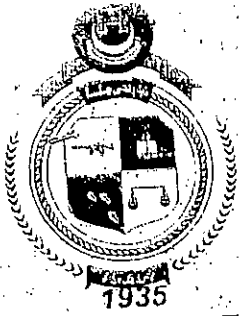
RESPONDENTS

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.
6. Mr. Said ul Amin No-649 MR Sub-Inspector respondents No-6 may
be serve through Respondent No-3.

.....Respondents

Appellant
Through 
Muhammad Arif Jan
Advocate High Court

Annex 'A'
 10
 9



Ph # 0925-621886
 Fax # 0925-623236

Office of the Commandant, Police Training College, Hangu.

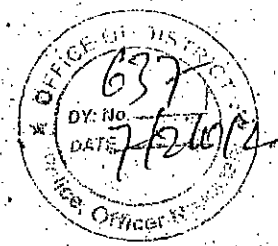
FOR PUBLICATION IN KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II ORDERS
 BY THE COMMANDANT POLICE TRAINING COLLEGE HANGU.

NOTIFICATION

Dated 31-1-2012

No. 318 /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 20.09.2011, is hereby announced and given below. Their Order of Merit is noted against each their name. The original OMC,s/History, Sheets, of the passed candidates only, shall be issued, & sent separately.

S/No.	Comp#	Name	Belt#	Distt./Unit	Merit No.
1	1-615	Noor Khitab	119	Buner	1
2	1-613	Muhammad Idrees	1714	CCP Pesh:	2
3	1-712	Muhammad Tariq	426	D.I Khan	3
4	1-669	Muhammad Ishaq	542	Charsadda	4
5	1-716	Amir Hamza	24	Kohat	5
6	1-658	Maqsood Shah	177	Abbottabad	6
7	1-648	Hamid Ullah	674	Swat	7
8	1-717	Tariq Mehmood	40	Haripur	8
9	1-710	Fazal Raheem	26	Swat	9
10	1-688	Mian Saïd Rehman	1144	Swat	10
11	1-632	Mir Akbar	531	Nowshera	11
12	1-659	Tariq Ahmad	383/19	CCP Pesh:	12
13	1-629	Fayaz Hussain	906	Nowshera	13
14	1-626	Ali Rehman	1247	Swat	14
15	1-670	Alanagir	703	Mardan	15
16	1-610	Muhammad Israr	644	Charsadda	16
17	1-689	Shujaat Ali	928	Swat	17
18	1-639	Wakeel Muhammad	214	Swat	18
19	1-606	Abdul Hamid	79	Hangu	19
20	1-608	Saif Ullah	380	Karak	20
Re-appeared ex-term ending 20.03.2011 & passed.					
21	1-508	Bahadar Zeb	59	Dir Upper	21
22	1-469	Muhammad Umar	444	Swat	22
Term 20.09.2011					
23	1-746	Sikandar	4409	CCP Pesh:	23
24	1-727	Shahinshah	605	Swabi	24
25	1-662	Rab Nawaz	744	Mardan	25



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 [Signature]

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 612-012

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(10) (H)

	Name	Roll#	Distt./Unit	Merit No.
29	Anwar Saeed	455	Buner	26
30	Mukhtar Hussain	897	Nowshera	27
31	Gul Nabi Shah	413	CCP Pesh:	28
29	Tahir Khan	400	CCP Pesh:	29
30	Shoukat Ali	57	Buner	30
31	Mehtab Gul	185	Swat	31
32	Jamil Akhtar	737	Abbottabad	32
33	Muhammad Ismail	1020	D.I Khan	33
34	Yahya Jani	1002	CCP Pesh:	34
35	Muhammad Farid	143	Battagram	35
36	Jehanzeb	252	Buner	36
37	Mohmanday	974	Mardan	37
38	Ibrar Ahmad	146	Chitral	38
39	Bahadar Zeb	528	Dir Upper	39
Re-appeared ex-term ending 20.03.2011 & passed.				
40	Marjan Ali	396	Charsadda	40
Term 20.09.2011				
41	Ali Haidar	176	CCP Pesh:	41
Re-appeared ex-term ending 20.03.2011 & passed.				
42	Asghar Khan	47/437	Bannu	42
Term 20.09.2011				
43	Umar Khan	482	Kohat	43
44	Kareem Khan	3447	CCP Pesh:	44
45	Bahadar Zeb	1080	Dir Lower	45
Re-appeared ex-term ending 20.03.2011 & passed.				
46	Fazal Raheem	1116	Kohat	45
Term 20.09.2011				
47	M. Azam Khan	3/548 SB	Chitral	46
48	Habib Shah	182	CCP Pesh:	47
49	Zahir Shah	3904	CCP Pesh:	48
50	Ishtiaq Ahmad	2309	CCP Pesh:	49
51	Akhtar Hussain	1198	Mardan	49
52	Muneer Hayat	273	Haripur	50
53	Amjad Ullah	190	CPC Pesh:	51
54	Rahim ullah	2771	CCP Pesh:	52
55	Bakht Karam	2987	CCP Pesh:	53
56	Sabz Ali	65	Bannu	54
57	Amir Alam	397	Dir Lower	55
58	Ijaz Ali	359	Dir Upper	56

ATTACHED

(11)

(12)

			Belt#	Distt./Unit	Merit No.
Term ending 20.03.2011 & passed.					
		Abdul Wahab	88	Swabi	57
Term 20.09.2011					
50	1-695	Liaqat Ali	655	Swat	58
61	1-617	Syed Afsar Shah	626	Abbottabad	59
62	1-747	Imtiaz	786	Bannu	60
63	1-678	Hashmat Khan	113	Mardan	61
64	1-701	Asad Ullah Saifi	3587	CCP Pesh:	62
65	1-651	Zain Ul Abideen	2801	CCP Pesh:	63
66	1-627	Saeed Ahmad	29	Manshra	64
67	1-607	Touqir Abbas	652	D.I Khan	65
Re-appeared ex-term ending 20.03.2011 & passed.					
68	1-521	Usman Ali	1264	Swat	66
Term 20.09.2011					
69	1-748	Haidar Hussain	465	Chitral	67
70	1-693	Amir Bahadar	796	Dir Lower	68
71	1-666	Faqir Ahmad	982	D.I Khan	69
Re-appeared ex-term ending 20.03.2011 & passed.					
72	1-546	Murad Ali	1072	Bannu	70
Term 20.09.2011					
73	1-633	Liaqat Ali	275	Buner	71
Re-appeared ex-term ending 20.03.2011 & passed.					
74	1-529	Saeed Ali	478	Nowshera	72
75	1-425	Syed Nisar Ahmad	640	Swabi	73
Term 20.09.2011					
76	1-593	Abdul Ghaffar	906	Mardan	74
77	1-707	Aman Ullah Khan	1208	Swat	75
78	1-631	Zahid Hussain	640	Manshra	76
Re-appeared ex-term ending 20.03.2011 & passed.					
79	1-411	Amjad Iqbal	382	Mardan	77
Term 20.09.2011					
80	1-620	Hayat Muhammad	665	Dir Lower	78
81	1-685	Bakht Ullah	2805	Swat	79
Re-appeared ex-term ending 20.03.2011 & passed.					
82	1-416	Mukamil Khan	342	Buner	80
Term 20.09.2011					
83	1-704	Wali Khan	3102	CCP Pesh:	81
84	1-588	Nasir Khan	673	Mardan	82
	1-618	Syed Nabi Shah	59	Nowshera	83
			205	Dir Upper	84

ATTESTED

(12)

(13)

#	Name	Belt#	Distt./Unit	Merit No.
635	Mashhood Ahmad	20/1139	CCP Pesh:	85
1-714	Sahar Gul	3182	CCP Pesh:	86
appeared ex-term ending 20.03.2011 & passed.				
1-511	Saeed Ur Rehman	8	Haripur	87
Term 20.09.2011.				
1-728	Syed Rehman	164	Kohistan	88
Re-appeared ex-term ending 20.03.2011 & passed.				
1-497	Muhammad Dawood	581	Swat	89
Term 20.09.2011				
1-723	Lal Bahadar	159	Dir Upper	90
1-674	Rawail Khan	257	CCP Pesh:	91
1-706	Ziad Muhammad	1607	Mardan	92
1-684	Sabzal Khan	84	Kohistan	93
1-687	Basharat Hussain	124	Battagram	94
1-731	Mujeeb ur Rehman	549	Kohistan	94
1-737	Adalat Khan	428	Swat	95
Re-appeared ex-term ending 20.03.2011 & Passed.				
1-547	Yasin Shah	1225	Mardan	96
Term 20.09.2011				
1-681	Anjad Ali	1104	Swabi	97
1-649	Munawar Khan	273	Kafak	98
1-646	Sher Badshah	888	Charsadda	99
1-600	Peer Wali Shah	3441	CCP Pesh:	100
Re-appeared ex-term ending 20.03.2011 & Passed.				
1-489	Muhammad Javid	296	Haripur	101
Re-appeared ex-term ending 20.09.2010 & passed.				
1-265	Qamar Alam	3800	CCP Pesh:	102
Re-appeared ex-term ending 20.03.2011 & passed.				
1-543	Naeem Khan	912	Mardan	103
1-485	Bakht Sardar	68	Swat	104
Term 20.09.2011				
1-749	Muhammad Ilyas	62	Haripur	105
1-619	Sultan Rehman	293	Dir Upper	106
Re-appeared ex-term ending 20.03.2011 & Passed.				
1-487	Zulfiqar Ali Shah	3595	CCP Pesh:	107
1-527	Ghulam Said	4125	CCP Pesh:	108
Term 20.09.2011				
1-683	Sher Zaman	242	Hangu	109
Re-appeared ex-term ending 20.09.2010 & passed.				
1-219	Usman-ud-Din	744	CCP Pesh:	110

ATTESTED

(13)

(14)

Roll#	Name	Belt#	Distt./Unit	Merit No.
Awarded ex-term ending 20.03.2011 & passed.				
1-472	Muhammad Ramzan	808	D.I Khan	111
1-417	Bakht Haleem	104	Shangla	112
Re-appeared ex-term ending 20.09.2010 & passed.				
116	1-283	Muhammad Imran	4240	CCP Pesh: 113
Term 20.09.2011				
117	1-664	Gul Ambar	78	Shangla 114
Re-appeared ex-term ending 20.03.2011 & passed.				
118	1-538	Mujeeb ur Rehman	3601	CCP Pesh: 115
119	1-473	Taaj Nabi	3867	CCP Pesh: 116
Re-appeared ex-term ending 20.03.2011 & passed.				
120	1-450	Abdul Karim	5	Tank 117
Awarded Grace Marks & passed. Term ending 20.09.2011				
121	1-640	Jehandad	1140	Mardan 118
122	1-733	Abdul Zahid	4	Tank 119
123	1-739	Rahat Shah	2090	CCP Pesh: 120
124	1-637	Noor Wali Khan	483	Karak 121
125	1-586	Niamat Ullah	19	Lakki Marwat 122
126	1-654	Akhtar Gul	979	Charsadda 123
127	1-721	Asmat Ullah	294	Lakki Marwat 124
128	1-612	Muhammad Jehangir	1355	Mardan 124
129	1-691	Muhammad Javed	707	Abbottabad 125
130	1-644	Muhammad Wisal	781	Swabi 126
131	1-667	Muhammad Ibrahim	3614	CCP Pesh: 127
132	1-595	Shahid Irfan	956	Charsadda 128
133	1-668	Ali Akbar	352	CCP Pesh: 129
134	1-736	Akhtar Ali	1917	CCP Pesh: 130
135	1-587	Fazl Muhammad	658	Mardan 131
136	1-726	Muhammad Younas	295	Mansehra 132
137	1-673	Hamish Khan	929	Nowshera 133
138	1-744	Aslam Janan	384	Kohat 134
139	1-643	Ajmal Khan	705	Swabi 135
140	1-599	Muhammad Seraj	42	Swat 136
141	1-679	M. Afzal Khan	687	Chitral 137
142	1-609	Muhammad Asif	356	Abbottabad 138
143	1-725	Zahid Ullah	182	Kohat 139
144	1-711	Ibrar Hussain	704	Dir Lower 140
145	1-598	Muhammad Arif	824	Kohat 141
146	1-730	Rasta Baz	94	Bannu 142
147	1-718	Sher Muhammad	1068	Mardan 143

ATTESTED

24/ 15

#	Name	Bell#	Distt./Unit	Merit No.
151	Gulitiaz	72	Bannu	145
	Khalid Khan	339	CPC Peshawar	146
	Amjad Ali	843	Maudan	147
152	Muhammad Ramzan	480	D.I Khan	148
153	Amroz Khan	1026	Swat	149
154	Sohrab	832	Swat	150
155	Ismail	372	Dir Upper	151
156	Mian Sher	64	Shangla	152
157	Fazal Hussain	116	Swabi	153
158	Sabz Ali	993	Dir Lower	154
159	Ruza Khan	507	Swabi	155
160	Sher Hayat	1010	Dir Lower	156
161	Ijaz Ahmad	16	Battagram	157
162	Fazal Mehmood	386	D.I Khan	158
163	Muhammad Rashid	188	Lakki Marwat	159
164	Sharif Ullah	24	Lakki Marwat	160
165	Farooq Shah	894	Charsadda	161
166	Qasim Khan	256	Bannu	162
Failed				Failed Subjects
167	Mazhar Ali Shah	87	Shangla	M.J
168	Sabir Hussain	1850	CCP Pesh:	FPT
169	Mahaz Ali	53	CPC Peshawar	PPWP
170	Khair Ul Rehman	978	Dir Lower	PPWP
171	Muhammad Asad	99	Kohistan	LSL, S.A, Sniper Fire
172	Rustam Khan	38	Kohat	LSL, PPWT, PPWP, FPP, S.F
173	Muhammad Saqlain	827	D.I Khan	LSL, PPWT, PPWP, FPT, PT, S.
174	Umer Ali	308	Hangu	PPWT, FPT, Sniper Fire
175	Muhammad Noor	202	Bannu	MJ, PPWP, FPT, PT
176	Umar Hayat	522	Swabi	LSL, FPT, AC, PT
177	Waqar Ahmad	674	Chitral	All Law
178	Asfandyar	359	Dir Lower	All Law
179	Umar Sadiq	941	Bannu	Sniper Fire
180	Muhammad Rustam	16	Abbottabad	Sniper Fire
181	Ziad Ullah	947	Charsadda	Sniper Fire
182	Muhammad Waheed	77	Mansehra	PT, Sniper Fire
183	Mutahir Shah	3775	CCP Pesh:	PPWT, FPT
184	Said Muhammad	2069	CCP Pesh:	PPWP, FPT, AC
185	Syed Dilbar Ali Shah	31	Mansehra	Sniper Fire
186	Sajid Khan	482	CCP Pesh:	Sniper Fire

RESTRICTED

(15) (16)

mp#	Name	Belt#	Distt./Unit	Merit No.
1-596	Zafar Hayat	1245	CCP Pesh:	PPWT, PPWP
1-734	Hamayoun	162	Shangla	LSL, S.A
1-690	Muhammad Haleem	256	Buner	MJ, PPWP, FPT
1-700	Anees Ahmad	198	Mardan	PPWT, PPWP
1-713	Imtiaz Ahmad	395	Haripur	P.T, Sniper Fire
1-696	Sher Muhammad	240	Tank	LSL, PPWT, PPWP
Re-appeared ex-term ending 20.03.2011 & Failed.				
1-420	Kifayat Hussain	4421	CCP Pesh:	PPWP
1-436	Muhammad Ali	397	Swat	All Law
Re-appeared ex-term ending 20.09.2010 & Failed.				
1-1823	Muhammad Ayaz	1823	CCP Pesh:/Nowshera	
Re-appeared ex-term ending 20.03.2011 & Failed.				
1-471	Hameed Ur Rehman	693	Chitral	All Law

Abdul Waheed Khan
 Abdul Waheed Khan PSP
 Commandant,
 Police Training College, Hangu.

No. 319-50 /S, dated Hangu, the 31.1.2012

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

1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. The Addl. IGP Investigation, Khyber Pakhtunkhwa, Peshawar, for publication in Police (Part-II).
3. The Capital City Police Officer, Peshawar.
4. The DIsG of Police, Bannu, D.I Khan, Mardan, Malakand, Hazara and Kohat, Regions.
5. The Director, Campus Peace Corps at University of Peshawar.
6. The District Police, Abbottabad, Bannu, Buner, Battagram, Charsadda, Chitral, D I Khan, D Lower, Dir Upper, Haripur, Hangu, Karak, Kohat, Kohistan, Lakki, Mansehra, Mardan, Nowshera, Shangla, Swabi, Swat and Tank.

Controller of Examinations
 Controller of Examinations,

Abdul Waheed Khan
 Abdul Waheed Khan PSP
 Commandant,
 Police Training College, Hangu.

ATTESTED
[Signature]

Annex 'B' (17)
(16)

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 Mir 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 Saif Nabi Shah No. 787/MR	Nowshera District	20.09.2011	83
5.	ASI Shehid 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
(MUHAMMAD ALI KHAN) PSP
Regional Police Officer,
Mardan.

No. 9549-54/ES.

Dated Mardan the 05/07/2019.

1. Deputy Inspector General of Police CTD Khyber Pakhtunkhwa, Peshawar.
2. DIG/Commandant National Highways & Motorway Police Training College, Snelkhpura.
3. Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
4. District Police Officer, Nowshera.
5. Chief Traffic Officer, Peshawar.
6. Assistant Director Anti Corruption Establishment Nowshera Range (*****)

[Signature]
DIRECTOR

17

CR=144-1

18

OFFICE OF THE
DISTRICT POLICE OFFICER
NOWSHERA

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

2019
234
25-1-19
District Police Officer
Nowshera

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/DT/1071/02
2019

En: (18 Pages)

EC / Insp. by NSR.

For action/comments

Naming
RDO/Mardan
23/1/19

Insp. Legal
An
NSR
8-2

OFFICE OF DISTRICT
POLICE
941
11/01/19

ALL

18

19/03/01 15:09

(FAX)

P.001/001

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

No. 1001 /Legal dated Peshawar, the 28/02 /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.

~~They are entitled to seniority as per merit list of PTC Hangu results of lower school course and intermediate school course.~~

[Signature]
AIG/Legal.

For Inspector-General of Police,
Khyber Pakhtunkhwa, Peshawar
11.02.2019

~~RECEIVED~~



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

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

2019

20
19

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 PTC Hangu results of Lower School Course and Intermediate College Course. (Copy attached).

Submitted please.

District Police Officer,
Nowshera

RECEIVED

Annex 'D'
23

20

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

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

To: All District Police Officer's
in Mardan Region.

No. 2895-98 JES.

03 June, 2021.

Subject: UPPER COLLEGE COURSE.

Memo:

The following Offg: Sub Inspectors of Mardan Region are hereby selected for Upper College Course commencing from 05.06.2021 at Police Training College Hangu.

S. No.	Name & Number	District/Unit
1.	Offg: SI Masood Khan No. 710/MR	Operation Wing, Charsadda
2.	Offg: SI Sajjad Halder No. 113/MR	On deputation to PTS Swabi from Swabi District
3.	Offg: SI Wali Muhammad No. 519/MR	Operation Wing, Mardan
4.	Offg: SI Mazhar Ali No. 620/MR	Investigation Wing, Swabi
5.	Offg: SI Shafi Ullah No. 645/MR	On deputation to Special Branch KP from Nowshera District
6.	Offg: SI Mushtaq Ali No. 521/MR	Investigation Wing, Swabi
7.	Offg: SI Abid Hussain No. 523/MR	On deputation to ACE KP Peshawar from Mardan District
8.	Offg: SI Seraj Nabi No. 624/MR	Investigation Wing, Mardan
9.	Offg: SI Ali Akbar No. 528/MR	Operation Wing, Nowshera
10.	ASI Nasir Khan No. 726/MR	Operation Wing, Mardan
11.	Offg: SI Aziz Ur Rahman No. 646/MR	Operation Wing, Mardan
12.	ASI Mir Akbar No. 733/MR	Operation Wing, Nowshera
13.	Offg: SI Alamgir No. 640/MR	On deputation to Elite Force KP from Nowshera District
14.	Offg: SI Shahen Shah No. 641/MR	On deputation to Elite Force KP from Swabi District
15.	Offg: SI Rabnawaz No. 528/MR	On deputation to Elite Force KP from Mardan District
16.	ASI Akhtar Hussain No. 734/MR	Operation Wing, Nowshera
17.	Offg: SI Akhtar Hussain No. 647/MR	Investigation Wing, Nowshera
18.	Offg: SI Abdul Ghaffar No. 533/MR	Investigation Wing, Nowshera
19.	Offg: SI Nasir Khan No. 535/MR	On deputation to FRP KP from Charsadda District
20.	ASI Saif Nabi Shah No. 787/MR	Operation Wing, Nowshera

All the above named Officers may be relieved immediately with the direction to report their arrival at Police Training College Hangu alongwith original CNIC, Complete Uniform Kit, Medical fitness / No Covid-19 Symptoms Certificates and nominal roll on the prescribed form on 06.06.2021 before 1600 hours.

Regional Police Officer,
Mardan.

cc.

1. Commandant Police Training College, Hangu for information & necessary action w/r to his office Signal Nos. 877-944/GC dated 21.05.2021 and 1144-84/GC dated 29.05.2021
2. Deputy Inspector General of Police, Special Branch KP, Peshawar
3. Commandant FRP KP Peshawar
4. Deputy Commandant Elite Force KP, Peshawar
5. All SsP Investigation in Mardan Region.
6. Assistant Director (ADMN) ACE KP Peshawar
7. Director Police Training School, Swabi

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Annex 'D'

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، اندریں 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 سچ 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 پیروڈز 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 ہذا 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 ایچ میٹس کے ساتھ سینیاریٹی اور ترقی دی جاوے۔

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

787

6-4-2023

العارض

ATTESTED

(77)

WAKALATNAMA

BEFORE THE HON'BLE KP Service Tribunal Peshawar

Said Nabi Shukh

Plaintiff(s)
Petitioner(s)
Complainant(s)

VERSUS

DPC Golli

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

By this, power-of-attorney I/we the said Said Nabi Shukh 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