

SA 1890/2023

05<sup>th</sup> June, 2023

01. Appellant present in person. Mr. Asad Ali Khan, Assistant Advocate General alongwith Attaur Rehman, Inspector (Legal) for the respondents present.

02. Reply/comments on behalf of the respondents submitted. Placed on file and a copy whereof handed over to appellant. To come up for rejoinder, if any, and arguments on 11.09.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar


  
(FAREEHA PAUL)  
Member (E)

*\*Fazle Subhan, P.S\**

04<sup>th</sup> April. 2023

Appellant alongwith counsel present. Mr. Asad Ali Khan. Assistant A.G alongwith Niaz Muhammad DSP (Legal) and Attaur Rehman, Inspector for the respondents.

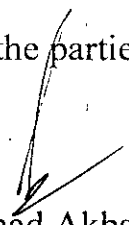
Learned AAG requested for further time to submit reply/comments. Granted. To come up for reply/comments on 05.05.2023 before the S.B. Parcha Peshi given to the parties.

  
(Fareeha Paul)  
Member(E)

05.05.2023

Junior to counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General alongwith Mr. Atta ur Rehman, Inspector for the respondents present.

Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments. Adjourned. To come up for reply/comments on 05.06.2023 before S.B. Parcha Peshi given to the parties.

  
(Muhammad Akbar Khan)  
Member (E)

25.01.2023

Learned counsel for the appellant present and seeks further time to deposit security and process fee. Last opportunity is given to the appellant to deposit security fee within 03 days. Respondents be summoned through TCS, the expenses of which also be deposited by the appellant within 03 days. To come up for written reply/comments on 02.03.2023 before the S.B

SCANNED  
KPST  
Peshawar

Rs-100/-  
Appellant Deposited  
Security & Process Fee

*[Signature]*  
31/1/23

*[Signature]*  
(Salah-Ud-Din)  
Member (J)

02.03.2023

Learned counsel for the appellant present. Mr. Umair Azam, Additional Advocate General alongwith Mr. Atta-Ur-Rehman, Inspector for the respondents present.

SCANNED  
KPST  
Peshawar

Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments. Adjourned. To come up for reply/comments on 04.04.2023 before S.B. P.P. given to Parties.

*[Signature]*  
(Muhammad Akbar Khan)  
Member (E)

23<sup>rd</sup> Nov, 2022

Learned counsel for the appellant present.

Let it be fixed for preliminary hearing on 22.12.2022  
before S.B.



(Kalim Arshad Khan)  
Chairman

22<sup>nd</sup> Dec, 2022 Counsel for the appellant present. Preliminary arguments heard.

Counsel for the appellant contended that the appellant completed requisite mandatory and professional training courses in the year 2012 along with his batch mate. The appellant was serving in central unites in Police department. In the year 2016 the standing order No. 2 of 2016 was issued wherein the officials working in central unites consider on deputation and their lien was transferred to their concerned district. Thereafter the lien of the appellant was also transferred to his concern district in 2016. That now the appellant was confirmed in the rank of ASI and promoted to list A vide order dated 31-1-2022 however the batch mate of the appellant was promoted in the year 2018. Feeling aggrieved, the appellant filed departmental appeal on 14.02.2022 which was rejected on 23-8-2022, hence the instant service appeal preferred on 22.9.2022. The appeal is admitted to full hearing subject to all just and legal objections by the other side. Appellant is directed to deposit security fee. Respondents be summoned through TCS, the expenses of which be deposited by the appellant within by the appellant within three days. To come up for written reply/comments on 25.1.2023 before the S.B.

**SCANNED**  
**KPST**  
**Peshawar**



(Kalim Arshad Khna)  
Chairman

Respected Sir,


It is submitted that the present appeal has been filed by the learned counsel for the appellant which was returned to him with office objection 1-7 (Flag-A). Today i.e on 03.10.2022 he re-filed the same without removing the objection no. 5 with a note of request i.e (Flag-B).

Now the appeal is submitted to your honour under rule-7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

  
REGISTRAR

Worthy Chairman


*objection be  
trial before the  
court*

  
15/10/22

26<sup>th</sup> Oct., 2022

Lawyers are on strike today. The Worthy Chairman is on official tour to D.I.Khan.

To come up for hearing on office objection before the Worthy Chairman on 23.11.2022. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.


  
(Faraha Paul)  
Member(E)

The appeal of Mr. Khaled Khan ASI RRF Peshawar received today i.e. on 22.09.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Annexures of the appeal may be attested.
- 3- Check list is not attached with the appeal.
- 4- Affidavit is attested by the Oath Commissioner.
- 5- Copy of rejection order of departmental appeal dated 23/8/2022 is not attached with the appeal which may be placed on it.
- 6- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 7- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2680 /S.T,

DL 26/9 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Syed Noman Ali Bukhari Adv.

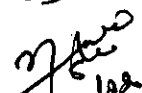
Sir

Objection No: 1, 2, 3, 4 is removed.

Objection No. 5, copy of Rejection order is not available with Appellant mentioned in memo of appeal may be requisition of ~~it~~ from the Deptt. Affidavit in respect of the same ~~man adill~~ also subject submitted to court.

Objection No. 6 removed.

Objection No. 7 removed & file resubmitted.

  
31/09/22

BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.

Appeal No. 1890 /2022

KHALID KHAN

V/S

Police Deptt.

.....

**P**

S.No.	Documents	Annexure	P. No.
1.	Memo of Appeal	----	01-06
2.	Copy of certificates	-A-	07-14
3.	Copy of standing order	-B-	15
4.	Copy of posting order	-C-	16-18
5.	Copy of promotion order	-D-	19-24
6.	Copy of confirmation order	-E-	25-26
7.	Copy of list	-F-	27-30
8.	Copy of departmental appeal	-G-	31-32
9.	Vakalat Nama	----	33

*[Signature]*  
APPELLANT  
KHALID KHAN

THROUGH:

*[Signature]*  
M. ASIF YOUSAFZAI  
ADVOCATE SUPREME COURT

*[Signature]*  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

(SHAHKAR KHAN YOUSAFZAI)  
Advocate Peshawar

**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.**

Appeal No. 1890 /2022

Khyber Pakhtunkhwa  
Service Tribunal  
1419  
22/09/22

Mr. Khalid Khan ASI No, MR/85  
Rapid Response Force, Peshawar (RRF).

**APPELLANT**

VERSUS

1. The Inspector General of Police: KP Peshawar.
2. The AIG/Establishment, CPO Khyber Pakhtunkhwa Peshawar.
3. The Deputy Commandant, RRF Khyber Pakhtunkhwa Peshawar.
4. The Regional Police Officer Mardan Region Mardan.

**RESPONDENTS**

led-to-day

Registrar  
22/9/22

.....

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNALS ACT, AGAINST ORDER DATED 28.01.2022 WHERE IN THE APPELLANT WAS CONFIRMED AS ASI BUT WITH IMMEDIATE EFFECT AND AGAINST REJECTION ORDER DATED 23-08-2022 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.**

.....



(2)

**PRAYER:**

**THAT ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED MAY BE MODIFIED TO THE EXTENT OF APPELLANT THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR CONFIRMATION AGAINST THE POST/RANK OF ASI FROM HIS DUE DATE WITH HIS BATCH MATES FOR THE PURPOSE TO REGAIN HIS SENIORITY WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.**

**RESPECTFULLY SHEWETH:**

**FACTS**

1. That the appellant was appointed is respondent department and performing his duties with entire satisfaction of his superior.
2. That the appellant has completed all the requisite/mandatory and professional training and courses including intermediate course in year 2012 along with his bathmats. **Copy of the courses certificate order is attached as annexure-A.**
3. That in the year 2016 the department issued standing order no; 02/2016 wherein all the police officials working in central units consider on deputation and their lien was transferred to their concerned district. Thereafter, the lien of the appellant was also transferred to parent district. But posted at Peshawar. **Copy of standing order and posting order is attached as annexure-B & C.**
4. That thereafter, the appellant was promoted as Officiating ASI w.e.from 17/09/2019 vide order dated 20 September 2019. The appellant was confirmed in the rank of ASI we.from 17/09/2021 and promoted to List E vide order dated 31/01/2022. **Copy of the orders are attached as annexure-D & E.**
5. That thereafter the appellant got knowledge about his batches whom were promoted to List E in the year 2018, thereafter the appellant filed departmental appeal dated 14/02/2022 for proper seniority and confirmation with his batchmats. The appeal of the appellant was

(13)

seen and filed by authority on 23/08/2022 but the rejection was not handed over to the appellant. **Copy of the list and departmental appeal is attached as annexure-F & G.**

6. That now the appellant come to this Hon'ble Tribunal for his claim on the following grounds amongst others.

**GROUND:**

- A) That not considering the appellant for confirmation as ASI with his batchmates and rejection order is against the facts, law, rules, norms of Justice and fair Play therefore liable to be set aside.
- B) That the appellant was deprived from his rights of promotion in an arbitrary manner which is the violation of Article-2,4 and 25 of the Constitution of Pakistan.
- C) That the appellant was entitled for confirmation w.e.f from his batchmates / juniors were promoted but he was deprived from his legal and constitutional right for the fault of others.
- D) That the standing order is silent about the seniority provision and there is not deprivation of seniority in the standing order but department malafide deprive the appellant from seniority and kept him on bottom. Which is illegal and against the law and rules.
- E) That the appellant was entitled for Seniority and position with their batch mates according to superior court judgment but he was deprived from his legal and constitutional right for the fault of others.
- F) That according to Superior Court Judgment reported as **1997 SCMR 515** in which it is held that delay in making promotion had entirely due to reason that officer of that department not carry out fairly simple exercise with reasonable period so the appellant is entitled to the promotion from back date.
- G) That it is well settled principle of justice that no one should be suffered from the arbitrary acts of public functionaries and the public functionaries are required to act in accordance with rules and law with fair means. But in case of appellant such principle has been violated.
- H) That the appellant was not treated according to the law and rules and deprive from the legal right of the promotion.

I) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant maybe accepted as prayed for.

*[Signature]*  
**APPELLANT**  
Khalid Khan

THROUGH:

*[Signature]*  
**M. ASIF YOUSAFZAI**  
ADVOCATE SUPREME COURT

*[Signature]*  
**(SYED NOMAN ALI BUKHARI)**  
ADVOCATE HIGH COURT

**(SHAHKAR KHAN YOUSAFZAI)**  
Advocate Peshawar

(S)

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. \_\_\_\_\_/2022

KHALID KHAN.

V/S

Police Deptt:


**CERTIFICATE:**

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

DEPONENT

**LIT OF BOOKS:**

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE.
3. Any other case law as per need.

  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

6

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. \_\_\_\_\_/2022

KHALID KHAN

V/S

Police Deptt:

**AFFIDAVIT**

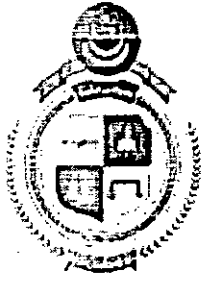
I, KHALID KHAN, (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

DEPONENT

*Khalid Khan*  
KHALID KHAN



# Police Training College, Hangu



Esthd. 1925

## Detail Marks Certificate / History Sheet

Starting Date : 01.04.2011 Ending Date : 20.09.2011  
 College Course : Intermediate Name : Khalid Khan  
 Father Name : Abdul Sattar CNIC No. : 16202-0441699-5  
 Rank : HC Belt No. : 339  
 Domicile Distt. : Swabi Enlist: District/Unit : CPC Peshawar  
 Blood Group : B- D.O.B : 01.02.1981  
 Comp#: : I-602 Education : B.A  
 Company : Khurshid Shaheed Merit : 146  
 Contact No. : 0345-8125516 Squad : A

LAW			DRILL			REMARKS
PPC	82	/100	Parade	11.83	/15	Awarded Grace Marks & declared as passed.
CrPC/QS	67	/100	PT	14	/20	
LSL	50	/100	FC	32.33	/50	
PR	74	/100	MD	26.67	/40	
IST	42	/50	DPA	33.67	/50	
MJ	51	/100	Assault Fire	145	/150	
SA	64	/100	Sniper Fire	80	/100	
PPWT	50.5	/100	Raid on P.O.s	9.33	/15	
PPWP	50	/100	Ambush	9.33	/15	
FPT	24	/40	Naka Bandi	11.67	/15	
AC	18	/30	Total Drill	373.83	/470	
FPP	24	/30				
PCE	33.34	/50				
<b>Total Law</b>	<b>629.84</b>	<b>/1000</b>				

G-Total: 1003.67 /1470 Overall Percentage is: 68.28  
 Leave availed: 3 days Medical Rest: Nil Absence: 3 days Punishment: 3 days E.D Reward: Nil

Commandant  
 Police Training College, Hangu



Ph # 0925-621886

Fax # 0925-623236

Office of the Commandant, Police Training College, Hangu.

2

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

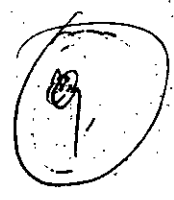
**NOTIFICATION**

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 DMC.s/History Sheets, of the passed candidates only, shall be issued & sent separately.

S/No.	Comp#	Name	Belt#	Distt./Unit	Merit No.
1	I-615	Noor Khitab	119	Buner	1
2	I-613	Muhammad Idrees	1714	CCP Pesh:	2
3	I-712	Muhammad Tariq	426	D.I Khan	3
4	I-669	Muhammad Ishaq	542	Charsadda	4
5	I-716	Amir Hamza	24	Kohat	5
6	I-658	Maqsood Shah	177	Abbottabad	6
7	I-648	Hamid Ullah	674	Swat	7
8	I-717	Tariq Mehmood	40	Haripur	8
9	I-710	Fazal Raheem	26	Swat	9
10	I-688	Mian Saïd Rehman	1144	Swat	10
11	I-632	Mir Akbar	531	Nowshera	11
12	I-659	Tariq Ahmad	383/19	CCP Pesh:	12
13	I-629	Fayaz Hussain	906	Nowshera	13
14	I-626	Ali Rehman	1247	Swat	14
15	I-670	Alamgir	303	Mardan	15
16	I-610	Muhammad Israr	644	Charsadda	16
17	I-689	Shujaat-Ali	928	Swat	17
18	I-639	Wakeel Muhammad	214	Swat	18
19	I-606	Abdul Hamid	79	Hangu	19
20	I-608	Saif Ullah	380	Karak	20
Re-appeared ex-term ending 20.03.2011 & passed.					
21	I-508	Bahadar Zeb	59	Dir Upper	21
22	I-469	Muhammad Umar	444	Swat	22
Term 20.09.2011					
23	I-746	Sikandar	4409	CCP Pesh:	23
24	I-727	Shahinshah	605	Swabi	24
25	I-662	Rab Nawaz	744	Mardan	25

S/No.	Comp#	Name	Belt#	Distt:/Unit	Merit No.
26	1-699	Anwar Saeed	455	Buner	26
27	1-722	Ifikhar Hussain	897	Nowshera	27
28	1-657	Gul Nabi Shah	413	CCP Pesh:	28
29	1-740	Tahir Khan	400	CCP Pesh:	29
30	1-589	Shoukat Ali	57	Buner	30
31	1-622	Mehtab Gul	185	Swat	31
32	1-715	Jamil Akhtar	737	Abbottabad	32
33	1-653	Muhammad Ismail	1020	D.I Khan	33
34	1-590	Yahya Jan	1002	CCP Pesh:	34
35	1-738	Muhammad Farid	143	Battagram	35
36	1-697	Jehanzeb	252	Buner	36
37	1-652	Mohmanday	974	Mardan	37
38	1-677	Ibrar Ahmad	146	Chitral	38
39	1-682	Bahadar Zeb	528	Dir Upper	39
<b>Re-appeared ex-term ending 20.03.2011 &amp; passed.</b>					
40	1-533	Marjan Ali	396	Charsadda	40
<b>Term 20.09.2011</b>					
41	1-624	Ali Haidar	176	CCP Pesh:	41
<b>Re-appeared ex-term ending 20.03.2011 &amp; passed.</b>					
42	1-549	Asghar Khan	47/437	Bannu	42
<b>Term 20.09.2011</b>					
43	1-741	Umar Khan	482	Kohat	43
44	1-705	Kareem Khan	3447	CCP Pesh:	44
45	1-645	Bahadar Zeb	1080	Dir Lower	45
<b>Re-appeared ex-term ending 20.03.2011 &amp; passed.</b>					
46	1-493	Fazal Raheem	1116	Kohat	45
<b>Term 20.09.2011</b>					
47	1-680	M. Azam Khan	3/548 SB	Chitral	46
48	1-672	Habib Shah	182	CCP Pesh:	47
49	1-656	Zahir Shah	3904	CCP Pesh:	48
50	1-623	Ishtiaq Ahmad	2309	CCP Pesh:	49
51	1-692	Akhtar Hussain	1198	Mardan	49
52	1-720	Muneer Hayat	273	Haripur	50
53	1-611	Amjad Ullah	190	CPC Pesh:	51
54	1-591	Rahim ullah	2771	CCP Pesh:	52
55	1-597	Bakht Karam	2987	CCP Pesh:	53
56	1-650	Sabz Ali	65	Bannu	54
57	1-702	Amir Alam	397	Dir Lower	55
58	1-732	Ijaz Ali	359	Dir Upper	56





S/No.	Comp#	Name	Bel:#	Distt:/Unit	Merit No.
87	1-635	Mashhood Ahmad	20/1139	CCP Pesh:	85
88	1-714	Sahar Gul	3182	CCP Pesh:	86
<b>Re-appeared ex-term ending 20.03.2011 &amp; passed.</b>					
89	1-511	Saeed Ur Rehman	8	Haripur	87
<b>Term 20.09.2011.</b>					
90	1-728	Syed Rehman	164	Kohistan	88
<b>Re-appeared ex-term ending 20.03.2011 &amp; passed.</b>					
91	1-497	Muhammad Dawood	581	Swat	89
<b>Term 20.09.2011</b>					
92	1-723	Lal Bahadar	159	Dir Upper	90
93	1-674	Rawail Khan	257	CCP Pesh:	91
94	1-706	Ziad Muhammad	1607	Mardan	92
95	1-684	Sabzal Khan	84	Kohistan	93
96	1-687	Basharat Hussain	124	Battagram	94
97	1-731	Mujeeb ur Rehman	549	Kohistan	94
98	1-737	Adalat Khan	428	Swat	95
<b>Re-appeared ex-term ending 20.03.2011 &amp; Passed.</b>					
99	1-547	Yasin Shah	1225	Mardan	96
<b>Term 20.09.2011.</b>					
100	1-681	Amjad Ali	1104	Swabi	97
101	1-649	Munawar Khan	273	Karak	98
102	1-646	Sher Badshah	888	Charsadda	99
103	1-600	Peer Wali Shah	3441	CCP Pesh:	100
<b>Re-appeared ex-term ending 20.03.2011 &amp; Passed.</b>					
104	1-489	Muhammad Javid	296	Haripur	101
<b>Re-appeared ex-term ending 20.09.2010 &amp; passed.</b>					
105	1-265	Qamar Alam	3800	CCP Pesh:	102
<b>Re-appeared ex-term ending 20.03.2011 &amp; passed.</b>					
106	1-543	Naeem Khan	912	Mardan	103
107	1-485	Bakht Sardar	68	Swat	104
<b>Term 20.09.2011</b>					
108	1-749	Muhammad Ilyas	62	Haripur	105
109	1-619	Sultan Rehman	293	Dir Upper	106
<b>Re-appeared ex-term ending 20.03.2011 &amp; Passed.</b>					
110	1-487	Zulfiqar Ali Shah	3595	CCP Pesh:	107
111	1-527	Ghulam Said	4125	CCP Pesh:	108
<b>Term 20.09.2011</b>					
112	1-683	Sher Zaman	242	Hangu	109
<b>Re-appeared ex-term ending 20.09.2010 &amp; passed.</b>					
113	1-219	Usman-ud-Din	744	CCP Pesh:	110

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

**Re-appeared ex-term ending 20.03.2011 & passed.**

59 1-578 Abdul Wahab 88 Swabi 57

**Term 20.09.2011**

60 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 1131 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 Mansehra 64

67 1-607 Fouqir 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 Sartaj 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 Mansehra 76

**Re-appeared ex-term ending 20.03.2011 & passed.**

79 1-411 Ainjad 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

85 1-618 Syed Nabi Shah 59 Nowshera 83

86 1-724 Amin Khan 205 Dir Upper 84

11

S.No.	Comp#	Name	Belt#	Distt:/Unit	Merit No.
148	1-636	Muhammad Ilyas	890	Mardan	144
149	1-660	Gultiaz	72	Bannu	145
150	1-602	Khalid Khan	339	CPC Peshawar	146
151	1-742	Amjad Ali	843	Mardan	147
152	1-676	Muhammad Ramzan	480	D.I Khan	148
153	1-743	Amroz Khan	1026	Swat	149
154	1-709	Sohrab	832	Swat	150
155	1-614	Ismail	372	Dir Upper	151
156	1-719	Mian Sher	64	Shangla	152
157	1-671	Fazal Hussain	116	Swabi	153
158	1-638	Sabz Ali	993	Dir Lower	154
159	1-661	Raza Khan	507	Swabi	155
160	1-694	Sher Hayat	1010	Dir Lower	156
161	1-735	Ijaz Ahmad	16	Buttagram	157
162	1-698	Fazal Mehmood	386	D.I Khan	158
163	1-605	Muhammad Rashid	188	Lakki Marwat	159
164	1-604	Sharif Ullah	24	Lakki Marwat	160
165	1-686	Farooq Shah	894	Charsadda	161
166	1-625	Qasim Khan	256	Bannu	162

**Failed**

**Failed Subjects**

167	1-663	Mazhar Ali Shah	87	Shangla	M.J
168	1-592	Sabir Hussain	1850	CCP Pesh:	FPT
169	1-642	Mahaz Ali	53	CPC Peshawar	PPWP
170	1-641	Khair Ul Rehman	978	Dir Lower	PPWP
171	1-665	Muhammad Asad	99	Kohistan	LSL, S.A, Sniper Fire
172	1-729	Rustam Khan	38	Kohat	LSL, PPWT, PPWP, FPP, S. Fire
173	1-703	Muhammad Saqlain	827	D.I Khan	LSL, PPWT, PPWP, FPT, PT, S. Fire
174	1-616	Umer Ali	308	Hangu	PPWT, FPT, Sniper Fire
175	1-634	Muhammad Noor	202	Bannu	MJ, PPWP, FPT, PT
176	1-708	Umar Hayat	522	Swabi	LSL, FPT, AC, PT
177	1-675	Waqar Ahmad	674	Chitral	All Law
178	1-621	Asfandyar	359	Dir Lower	All Law
179	1-628	Umar Sadiq	941	Bannu	Sniper Fire
180	1-594	Muhammad Rustam	16	Abbottabad	Sniper Fire
181	1-647	Ziad Ullah	947	Charsadda	Sniper Fire
182	1-630	Muhammad Waheed	77	Mansehra	PT, Sniper Fire
183	1-655	Mutahir Shah	3775	CCP Pesh:	PPWT, FPT
184	1-745	Said Muhammad	2069	CCP Pesh:	PPWP, FPT, AC
185	1-603	Syed Dilbar Ali Shah	31	Mansehra	Sniper Fire
186	1-601	Sajid Khan	482	CCP Pesh:	Sniper Fire

S/No.	Comp#	Name	Belt#	Distt./Unit	Merit No.
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**Re-appeared ex-term ending 20.03.2011 & passed.**

114	1-472	Muhammad Ramzan	808	D.I Khan	111
115	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
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Term 20.09.2011

117	1-664	Gul Ambar	78	Shangla	114
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**Re-appeared ex-term ending 20.03.2011 & passed.**

118	1-538	Mujeeb ur Rehman	3601	CCP Pesh:	115
119	1-473	Tajj Nabi	3867	CCP Pesh:	116

**Re-appeared ex-term ending 20.03.2011 & passed.**

120	1-450	Abdul Karim	5	Tank	117
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**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	Faiz Muhammad	658	Mardan	131
136	1-726	Muhammad Younas	295	Manshehra	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

S/No.	Comp#	Name	Belt#	Distt:/Unit	Merit No.
187	1-596	Zafar Hayat	1245	CCP Pesh:	PPWT,PPWP
188	1-734	Hamayoun	162	Shangla	LSL,S.A
189	1-690	Muhammad Haleem	256	Buner	MJ,PPWP,FPT
190	1-700	Ances Ahmad	198	Mardan	P.R,PPWT,PPWP
191	1-713	Imtiaz Ahmad	395	Haripur	P.T, Sniper Fire
192	1-696	Sher Muhammad	240	Tank	LSL,PPWT,PPWP

Re-appeared ex-term ending 20.03.2011 & Failed.

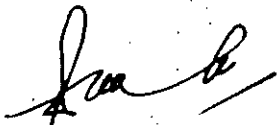
193	1-420	Kifayat Hussain	4421	CCP Pesh:	PPWP
194	1-436	Muhammad Ali	397	Swat	All Law

Re-appeared ex-term ending 20.09.2010 & Failed.

195		Muhammad Ayaz	1823	CCP Pesh:/Nowshera	
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Re-appeared ex-term ending 20.03.2011 & Failed.


196	1-471	Hameed Ur Rehman	693	Chitral	All Law
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**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 Gazette 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, Dir Lower, Dir Upper, Haripur, Hangu, Karak, Kohat, Kohistan, Lakki, Mansehra, Mardan, Nowshera, Shangla, Swabi, Swat and Tank.

  
**Controller of Examinations,**

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



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

15

**STANDING ORDER NO. 02/2016**  
**Quotas of Districts in Central Units**

This Standing Order is issued under Article 10(3) of Police Order 2002 and in pursuance of the Police Policy Board decision taken in its 20th meeting held on 15 December 2015.

2. **Aim:** - This Standing Order aims at fixing the contributory quota of District and Regions in the executive strength of the Central Units.
3. **Existing Sanctioned Strength in Rank as determining Factor:** - (1) The executive strength from Constable to Sub-Inspector of all Central Units including Frontier Reserve Police, Elite force, Central Police Office, Special Branch, Traffic Khyber Pakhtunkhwa, CPO Investigation, Central Police Office, PQR and Training Schools and College will be provided by the Police Districts/Regions of the Province in accordance with the ratio of their existing sanctioned strength in overall sanctioned strength for each rank as detailed in attached Annexures.  
(2) CTD Strength will be determined as per their requirement and deployment plan which has already been approved and issued vide CPO letter No. 3229-80/E-II dated 31.01.2014.
4. **Recruitment, Promotions in Central Units:** - Recruitment and promotion in the ranks from constable to Sub-Inspector will be carried out and be regulate in concerned Districts and Regions, only. Central Units will neither recruit nor promote any officer unless it is specifically provided and allowed. All personnel serving in the central Units will be on deputation from concerned Districts and Regions and their lien will be in their parent District/Region. If in the past any recruitment has been carried out directly in the central units and lien of such recruits has not been fixed so far, it will be fixed in District of domicile of the concerned recruit. Furthermore for retirement purposes personnel will be posted back to their parent Districts.
5. **Tenure:** - The period in the central unit will be considered on deputation in the meaning of Police Rules and shall not exceed 03 years.
6. **Application:** - This Standing Order will come into force with immediate effect and transition to this scheme of things will not be at once but be in phased manner subject to occurrence of vacancies in central units and capacity of the contributing Districts to contribute as per quota in due course of time.
7. **Power to remove difficulties:** - If any difficulty arises in giving effect to this order, the Provincial Police Officer may by notification make such provisions as deemed appropriate.
8. **Amendment:** - All previous Standing Orders on the subject, to the extent of the provisions of this order, shall stand amended.

(NASIR KHAN DURRANI)  
Provincial Police Officer  
Khyber Pakhtunkhwa  
Peshawar



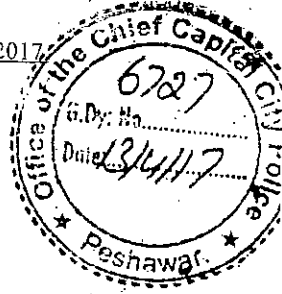
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OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar

No. 1532 /E-III, Dated Peshawar, the 13/04/2017

The Capital City Police Officer,  
Peshawar.

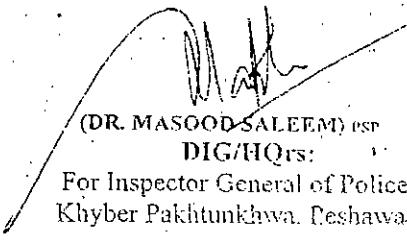


ORDER

Please refer to this office letter No. 1561/E-III, dated 21.03.2017 on the subject

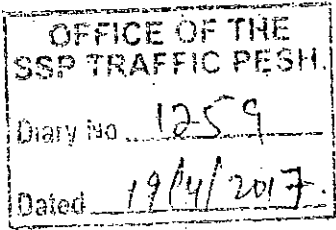
The following ASIs of District Police Mardan presently serving at Traffic Warden  
Peshawar may please be relieved and directed to report at their new place of posting under  
reference to this office:-

1. ASI Khalid Khan No. 38
2. ASI Ishaq Hussain No. 418
3. ASI Naveed Mushtaq No. 36

  
(DR. MASOOD SALEEM) esq  
DIG/HQrs:  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar


Vertical list of administrative codes and checkboxes for routing:
 

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OFFICE OF THE CAPITAL CITY POLICE OFFICER, PESHAWAR.  
No. 4601 /EC-I, dated Peshawar the 14/4, 2017.

Copy of above is forwarded to SSP/Traffic, Peshawar  
for necessary action w/r to this office memo No.3863/EC-I, dated  
30.03.2017.

  
FOR CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

Handwritten: EC/CA/SLC/17  
For [Signature]

Handwritten: 100 MR

Handwritten notes and signatures in the bottom left corner, including '4/18/17' and other illegible scribbles.



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

Order, 2016-17

17

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E

ORDER.

The following ASIs of Mardan Region are hereby transferred to [redacted] with units as noted against their names on deputation basis under Standing Order [redacted] with immediate effect:-

Sl. No.	NAME & RANK	FROM	TO
1.	ASI Syed Sardar Ali No. 741	District Swabi	[redacted]
2.	ASI Muhammad Riaz No. 149	District Charsadda	[redacted]
3.	ASI Wisal Ahmad No. 1379	District Mardan	RT [redacted]
4.	ASI Anjid Ali No. 292	District Mardan	[redacted]
5.	ASI Shah Jehan No. 1083/3935	District Charsadda	[redacted]
6.	ASI Saïd Rashid No. 1151	District Mardan	[redacted]
7.	ASI Anwar Behzad 260/480 SB	District Swabi	[redacted]
8.	ASI Yousaf Shah No. 671/1332	District Mardan	[redacted]
9.	ASI Muhammad Hassan No. 1408	District Mardan	[redacted]
10.	ASI Imtiaz Ali No. 770	District Mardan	[redacted]
11.	ASI Afsar Zaman No. 143	District Nowshera	[redacted]
12.	ASI Shah Zaman No. 271/382 CID	District Swabi	[redacted]
13.	ASI Shahab Ahmad No. 203	District Swabi	[redacted]
14.	ASI Gul Faraz No. 436	District Nowshera	[redacted]
15.	ASI Anjid Ali No. 300	District Nowshera	[redacted]
16.	ASI Sadiq Zaman No. 915	District Swabi	[redacted]
17.	ASI Muhammad Rafiq No. 784	District Mardan	[redacted]
18.	ASI Haider Ali No. 1061	District Mardan	[redacted]
19.	ASI Sajjad Ali No. 1338	District Mardan	[redacted]
20.	ASI Manzoor Khan No. 1503	District Mardan	[redacted]
21.	ASI Shahid Ali No. 35	District Swabi	[redacted]
22.	ASI Abdul Qayum No. 811	District Charsadda	[redacted]
23.	ASI Zafar Khan No. 1215	District Charsadda	[redacted]
24.	ASI Shah Nawaz No. 478	District Mardan now on deputation to Lakki	[redacted]
25.	ASI Muhammad Ali 1533	District Mardan	[redacted]
26.	ASI Khalid Khan No. 58	District Mardan	[redacted]
27.	ASI Ishfaq Hussain No. 418	District Mardan	[redacted]
28.	ASI Hussain Ullah No. 154	District Charsadda	[redacted]

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2016-17

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18

**ORDER**

Consequent upon r

PO/Peshawar direction vide Mem-  
are hereby promoted as ASIs c  
The Public Service Commission I

29	ASI Suliman No. 1494	District Mardan	PTC/A
30	ASI Hayat Khan No. 06	District Swabi	PTC/A
31	ASI Noor-ul-Amin No. 171	District Nowshera	PTC/A
32	ASI Syed Kazim Shah Bacha 738	District Mardan	PTC/A
33	ASI Majid Khan No. 10	District Mardan	PTC/A
34	ASI Nazakat Ali No. 61	District Mardan	PTC/A
35	ASI Fakhar Alam No. 192	District Nowshera	EPTC/A
36	ASI Sadat Ali No. 1474	District Mardan	EPTC/A
37	ASI Yaqoob No. 38	District Swabi	EPTC/A
38	ASI Jan Muhammad No. 1211	District Charsadda	EPTC/A
39	ASI Mustagfar Shah No. 1216	District Charsadda	EPTC/A
40	ASI Murad Ullah No. 1045	District Nowshera	EPTC/A
41	ASI Zahoor Ahmad No. 915/445	District Charsadda	Inv: CP
42	ASI Ismail Khan No. 100/119	District Charsadda	Inv: CP
43	ASI Maqsood Ali No. 90	District Mardan	Inv: CP
44	ASI Naveed Mushtaq No. 36	District Mardan	Inv: CP Pesh

No.	Name & No.
	IHC Awan Khar No. 878/1048
	IHC Murad Khan No. 1018
	IHC Jan Alam No. 363
	IHC Muhammad Riaz No. 264/68
	IHC Atanzeb No. 2792
	IHC Sheraz Khan No. 1510
	IHC Haji Muhammad Tahir No. 34
	IHC Mohammad Jehangir No. 142
	IHC Murad Ali No. 801
	IHC Niaz Muhammad No. 1213
	IHC Syed Sardar Ali No. 741
	IHC Fakhruzzaman No. 744
	IHC Noorul Islam No. 1034
	IHC Anjia Ali No. 292
	IHC Javid Akbar No. 1486
31.	IHC Ijaz Ali No. 424
32.	IHC Asad Iqbal No. 1454
35.	IHC Shah Jehan No. 1083/3935
37.	IHC Mukhtiar Muhammad No. 570
39.	IHC Said Rashid No. 1159
41.	IHC Nazir Muhammad No. 30
43.	IHC Masood Khan No. 977
45.	IHC Muhammad Idrees No. 149
47.	IHC Mian Hassan Shah No. 1214
49.	IHC Anwar Bshad No. 260/480
51.	IHC Arjad Ali No. 965
53.	IHC Syed Shuja Ali Shah No. 66
55.	IHC Murad Ishaq No. 1045
57.	IHC Tariq Aziz No. 1481
59.	IHC Zafar Khan No. 1215
61.	IHC Jan Muhammad No. 1211
63.	IHC Sabz Ali No. 1182
65.	IHC Mian Gail No. 1035
67.	IHC Yousaf Shah No. 671/1332
69.	IHC Iftikhar Ali No. 1104
71.	IHC Sadat Ali No. 1476
73.	IHC Abdul Jayum No. 811

o/c  
 (MUHAMMAD ALAM SHAH)  
 DIG/ICP  
 For Inspector General  
 Khyber Pakhtunkhwa

No. 4827-44 /E-III. Dated Peshawar, the 22/12/201

- Copy of above is forwarded for information and necessary action to:-
1. Addl: IGP/HQrs: Khyber Pakhtunkhwa Peshawar.
  2. Addl: IsGP/Special Branch, Elite Force, Investigation & Pakhtunkhwa Peshawar.
  3. Regional Police Officer Mardan, Region-I, Mardan w/r to his ltr 77/ES, dated 18.11.2016 (please sent by name list of ASIs present in Traffic Peshawar for transfer to other units).
  4. Commandant PTC/Hangu.
  5. District Police Officers Mardan, Charsadda, Nowshera, Swabi.
  6. Principals RTW/Manshra & EPTC/Nowshera.
  7. DSP/PQR Khyber Pakhtunkhwa Peshawar.
  8. Incharge Central Registry Branch CPO, Peshawar.

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

Phone No. 0937-9230113; Fax No. 0937-9230115.  
 Email Address: - [esrpmardan@gmail.com](mailto:esrpmardan@gmail.com)

2019

All District Police Officers, in Mardan Region.

11377-80/ES.

20 September, 2019

**Subject: PROMOTION AS OFFICIATING ASSISTANT SUB INSPECTORS.**

**Memo:** Consequent upon recommendation of the Departmental Promotion Committee held in this office on **17.09.2019**, the following adhoc promoted SIs/Head Constables already on list "D" of this Region being suitable for promotion are hereby promoted as Officiating Assistant Sub Inspectors (BPS-11) for a period of two years probation as per Police Rules 13-18 with effect from **17.09.2019** subject to the condition lay down against each:-

No.	Name & rank	Place of posting	Decision
1.	Awal Khan No. 818	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
2.	Khan Zeb No. 18	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
3.	Murad Khan No. 1018	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
4.	Fakhar Alam No. 192	On deputation to Elite Force KP from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
5.	Jan Alam No. 363	On deputation to PTS Swabi from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
6.	Imtiaz Ali No. 173	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
7.	Muhammad Riaz No. 68	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
8.	Javed Hussain No. 849	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified.
9.	Alam Zeb No. 2792	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
10.	Jehangir Khan No. 836	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
11.	Sheraz Khan No. 1510	Investigation Wing, Mardan	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified

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 A Serial record sent  
 to RPO MDN

2.	Zahoor Ahmad No. 945	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2015 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
3.	Haji Muhammad Tahir No. 34	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
4.	Shad Muhammad No. 1477	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 and for the period from 26.05.2017 to 31.12.2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
15.	Muhammad Jehangir No. 142	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
16.	Hazrat Ali No. 1331	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
17.	Murad Ali No. 801	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
18.	Muhammad Iqbal No. 306	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the period from 08.06.2018 to 31.12.2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
19.	Niaz Muhammad No. 1213	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
20.	Gulshan No. 841	On deputation to EPTC Nowshera from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
21.	Syed Sardar Ali No. 741	On deputation to PQR from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
22.	Ishfaq Ali No. 481	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
23.	Fakhr ul Zaman No. 744	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
24.	Ismail Khan No. 100/119	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
25.	Noou ul Islam No. 1034	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the period from 01.01.2018 to 02.07.2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
26.	Hukam Khan No. 26	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
27.	Amjad Ali No. 292	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
28.	Abdul Qadir No. 1483	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
29.	Javed Akbar No. 1486	On deputation to PDRM, School, Mardan from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
30.	Muhammad Hassan No. 1408	On deputation to CTD, KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified

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31.	Ijaz Ali No. 424	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
32.	Asad Iqbal No. 1454	On deputation to BDU KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
33.	Fazal Wahid No. 510	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
34.	Shah Jehan No. 3935	On deputation to CTD KP from Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
35.	Afsar Zaman No. 143	On deputation to CTD KP from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
36.	Mukhtiar Muhammad No. 570	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
37.	Nadeem Hussain No. 102	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
38.	Said Rashid No. 1159	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified-notified.
39.	Iftikhar Khan No. 139	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
40.	Nazar Muhammad No. 30	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
41.	Khalid Khan No. 786	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
42.	Majid Khan No. 10	On deputation to PTC Hangu from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
43.	Masood Khan No. 977	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
44.	Muhammad Faheem No. 391	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
45.	Muhammad Idrees No. 149	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
46.	Zawar Hussain No. 649	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
47.	Mian Hazrat Shah No. 1214	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
48.	Shah Zaman No. 271/382	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
49.	Anwar Behzad No. 260/480 SB	On deputation to CTD KP from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
50.	Khairstan No. 88	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
51.	Amjad Ali No. 965	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
52.	Abdur Rashid No. 70	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
53.	Syed Shujat Ali Shah No. 666	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
54.	Gul Faraz No. 436	On deputation to CTD KP from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course

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55.	Murad Ullah No. 1045	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
56.	Hayat Khan No. 06	On deputation to PTC Hangu from Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
57.	Tariq Aziz No. 1481	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
58.	Hazrat Nabi No. 1492	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
59.	Zafar Khan No. 1215	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
60.	Amjad Ali No. 300	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
61.	Jan Muhammad No. 1211	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
62.	Noorul Amin No. 171	On deputation to PTC Hangu from Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
63.	Sabz Ali No. 1182	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
64.	Kifayat Ullah No. 767	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
65.	Mian Gul No. 1085	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
66.	Yousaf Khan No. 497	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2016 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
67.	Yousaf Shah No. 671/1332	On deputation to Special Branch KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2017 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
68.	Iftikhar Ali No. 1108	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
69.	Suliman No. 1494	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the year 2017 & 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
70.	Sadat Ali No. 1476	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
71.	Yaqoob Khan No. 383	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course
72.	Abdul Qayum No. 811	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course

73.	Muhammad Ali No. 1583	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 & 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
74.	Shah Nawaz No. 478	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2015, 2016 & 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
75.	Imtiaz Ali No. 770	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
76.	Ishfaq Hussain No. 418	On deputation to Traffic KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
77.	Muhammad Rafiq No. 784	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
78.	Sadiq Zaman No. 915	On deputation to CTD KP from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
79.	Shahid Ali Khan No. 33	On deputation to Elite Force KP from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
80.	Mustagfir Shah No. 1216	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
81.	Manzoor Khan No. 1503	On deputation to Elite Force KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
82.	Syed Kazim Bacha No. 738	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
83.	Shahab Ahmed No. 203	On deputation to CTD KP from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
84.	Sajid Ali No. 1338	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
85.	Haide-notifiedr Ali No. 1051	On deputation to CTD KP from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
86.	Naveed Mushtaq No. 36	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
87.	Husban Ullah No. 134	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
88.	IHC Meraj Habib No. 676/2348	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACRs for the period from 16.08.2014 to 31.12.2014 & for the year 2015 to 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
89.	IHC Shah Jehan No. 1226	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
90.	IHC Noor Azeem No. 1132	Investigation Wing, Nowshera	Promoted conditionally subject to completion of Elite Tactical Course
91.	IHC Muhammad Saddique No. 2649	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
92.	IHC Asim Ullah No. 493	Charsadda District	Promoted conditionally subject to completion of Elite Tactical Course
93.	IHC Muhammad Izhar No. 445	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course
94.	IHC Asad Zaman No. 05	Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified

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95.	IHC Muhammad Israil No. 1498	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2018 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
96.	IHC Iftikhar Ahmad No. 872	On deputation to PTS Swabi from Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
97.	IHC Hamid Khan No. 1589	Mardan District	Promoted conditionally subject to completion of Elite Tactical Course
98.	IHC Fazal Akbar No. 315	Nowshera District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2016 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
99.	IHC Muhammad Arshed No. 542	On deputation to PTS Swabi from Swabi District	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified
100.	IHC Muhammad Aslam No. 122	Investigation Wing, Nowshera	Promoted conditionally subject to completion of Elite Tactical Course as well as ACR for the year 2017 by 10.10.2019. In case of non provision of ACR within stipulated period his name will be de-notified

Necessary Gazette Notification may be issued accordingly.

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

No. 11381-96ES,

Copies forwarded for favour of information and necessary action to the:-

1. Additional Inspector General of Police Special Branch, Khyber Pakhtunkhwa, Peshawar.
2. Commandant Police Training College, Hangu.
3. Deputy Inspector General of Police CTD, Khyber Pakhtunkhwa, Peshawar.
4. Deputy Inspector General of Police Traffic, Khyber Pakhtunkhwa, Peshawar.
5. Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
6. Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
7. AIG/BDU Khyber Pakhtunkhwa, Peshawar.
8. All Head of Investigation in Mardan Region.
9. Principal EPTC, Nowshera.
10. Principal Police Training School, Swabi.
11. Director Police School of Public Disorder & Riot Management, Mardan.
12. Deputy Superintendent of Police Welfare & PQR, Khyber Pakhtunkhwa, Peshawar.
13. PA Region Office, Mardan.

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

952

3-9-19

Deputy Elite Force

**Government of Khyber Pakhtunkhwa**  
Office of the Regional Police Officer,  
Mardan  
Phone No. 0937-9230113, Fax No. 0937-9230113  
Email Address: - [esrpomardan@gmail.com](mailto:esrpomardan@gmail.com)

**E**  
**25**

To The District Police Officer, Swabi.  
District Police Officer, Mardan.  
District Police Officer, Nowshera.  
District Police Officer, Charsadda.

No. 931-34 /ES, dated Mardan Region, the 31/01/21

Subject: CONFIRMATION IN THE RANK OF ASI & PROMOTION TO LI

Memo: Consequent upon recommendations of the Departmental Promotion Committee held in this office on 10.11.2021, the following Officiating Assistant Sub Inspectors of Mardan Region, are hereby approved for confirmation in the rank of ASI's after completion of two years probation under Police Rules-1934 Chapter-13 Rule-18. Their names are brought on promotion list "E" with immediate effect and are allotted Region Numbers noted against each.

S. No.	Name & rank	Place of posting	Date of promotion as Officiating Assistant Sub Inspector	Date of Confirmation as Assistant Sub Inspector	New Regional Numbers
1.	Miraj Habib No. 676/2348	Charsadda District	17.09.2019	17.09.2021	213/MR
2.	Murad Khan No. 1018	Nowshera District	17.09.2019	17.09.2021	160/MR
3.	Fakhar Alam No. 192	On deputation to Elite Force KP from Nowshera District	17.09.2019	17.09.2021	53/MR
4.	Imtiaz Ali No. 1473	On deputation to PTC Hangu from Mardan District	17.09.2019	17.09.2021	88/MR
5.	Jehangir Khan No. 836	Nowshera District	17.09.2019	17.09.2021	151/MR
6.	Haji Muhammad Tahir No. 34	Investigation Wing, Nowshera	17.09.2019	17.09.2021	221/MR
7.	Shad Muhammad No. 1477	On deputation to National Highways & Motorway Police, Islamabad from Mardan District	17.09.2019	17.09.2021	161/MR
8.	Hazrat Ali No. 1331	On deputation to Elite Force KP from Mardan District	17.09.2019	17.09.2021	78/MR
9.	Muhammad Iqbal No. 306	Mardan District	17.09.2019	17.09.2021	327/MR
10.	Gulshan No. 841	On deputation to Police School of Explosive Handling Nowshera from Nowshera District	17.09.2019	17.09.2021	326/MR
11.	Syed Sardar Ali No. 740	Swabi District	17.09.2019	17.09.2021	337/MR
12.	Ismail Khan No. 100/119	Charsadda District	17.09.2019	17.09.2021	253/MR
13.	Noou ul Islam No. 1034	Nowshera District	17.09.2019	17.09.2021	353/MR



S. No.	Name & rank	Place of posting	Date of promotion as Officiating Assistant Sub Inspector	Date of Confirmation as Assistant Sub Inspector	New Regional Numbers
14.	Amjad Ali No. 292 ✓	On deputation to CTD KP from Mardan District	17.09.2019	17.09.2021	370/MR
15.	Abdul Qadir No. 1483	Mardan District	17.09.2019	17.09.2021	367/MR
16.	Javed Akbar No. 1486 ✓	On deputation to Police School of Public Disorder & Riot Management, Mardan from Mardan District	17.09.2019	17.09.2021	22/MR
17.	Muhammad Hassan No. 1408 ✓	On deputation to CTD, KP from Mardan District	17.09.2019	17.09.2021	177/MR
18.	Ijaz Ali No. 424	Mardan District	17.09.2019	17.09.2021	402/MR
19.	Shah Jahan No. 3935	On deputation to CTD KP from Charsadda District	17.09.2019	17.09.2021	135/MR
20.	Afsar Zaman No. 143	On deputation to CTD KP from Nowshera District	17.09.2019	17.09.2021	411/MR
21.	Said Rashid No. 1159	On deputation to CTD KP from Mardan District	17.09.2019	17.09.2021	413/MR
22.	Khalid Khan No. 786 ✓	On deputation to Elite Force KP from Mardan District	17.09.2019	17.09.2021	35/MR
23.	Sadat Ali No. 1476	On deputation to Elite Force KP from Mardan District	17.09.2019	17.09.2021	539/MR
24.	Muhammad Ali No. 1583 ✓	On deputation to Elite Force KP from Mardan District	17.09.2019	17.09.2021	637/MR
25.	Hamid Khan No. 1589	Mardan District	17.09.2019	17.09.2021	520/MR

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Necessary Gazette Notification may be issued accordingly.

95  
2022  
Dependent of Police

(YASEEN FAROOQ)PSP  
Regional Police Officer,  
Mardan. 25.11.2022

- Deputy Inspector General of Police National Highways & Motorway Islamabad.
- Commandant Police Training College Hangu.
- Deputy Inspector General of Police CTD Khyber Pakhtunkhwa, Peshawar.
- Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
- Principal EPTC, Nowshera.
- Director Police School of Public Disorder and Riot Management, Mardan.
- Director Police School of Explosive Handling, Nowshera.
- Head of Investigation in Mardan Region.
- Clerk Region Office, Mardan.

OB 298  
03.02.22

OB/EC  
for n/a action.

DPO/Mardan  
09.2.22

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S#	Name & No	Date of Birth	Date of Enlistment	Date of admission into list "D"	Order of merit of Intermediate Result	Date of Promotion as Offg: ASI	Date of confirmation as ASI	Date of entry to list "E"	Date of Promotion as Offg: SI	Date of Upper College Course	Remarks
1.	ASI Mir Akbar No. 733/MR	12.03.1971	01.07.1990	20.09.2011	11	21.11.2014	21.11.2016	15.01.2018		05.10.2021	Granted his due Inter-se Seniority with their colleagues with whom they underwent Intermediate College Course as per orders of merit issued by PTC Hangu in the DPC held in this office on 18.06.2019
2.	Offg: SI Alamgir No. 640/MR	02.01.1977	28.01.1996	20.09.2011	15	02.07.2015	02.07.2017	02.07.2017	22.03.2018	05.10.2021	
3.	Offg: SI Shahen Shah No.641/MR	30.03.1977	07.12.1995	20.09.2011	24	12.11.2014	12.11.2016	05.12.016	22.03.2018	05.10.2021	Assigned revised seniority as ASI with his colleagues vide Peshawar High Court Judgment dated 24.12.2014.
4.	Offg: SI Rabnawaz No. 528/MR	10.06.1975	25.04.1995	20.09.2011	25	15.04.2014	15.04.2016	05.12.016	22.03.2018	05.10.2021	
5.	ASI Iftikhar Hussain No. 734/MR	06.06.1968	31.07.1991	20.09.2011	27	21.11.2014	21.11.2016	15.01.2018		05.10.2021	Granted his due Inter-se Seniority with their colleagues with whom they underwent Intermediate College Course as per orders of merit issued by PTC Hangu in the DPC held in this office on 18.06.2019
6. 7.	Offg: SI Mohamanday No. 529/MR	20.06.1970	08.12.1988	20.09.2011	37	02.07.2015	02.07.2017	02.07.2017	22.03.2018	Selected for Upper College Course with effect from 23.10.2021.	

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	Date of Birth	Date of Enlistment	Date of admission Into list "D"	Order of merit of Intermediate Result	Date of Promotion as Offg: ASI	Date of confirmation as ASI	Date of entry to list "E"	Date of Promotion as Offg: SI	Date of Upper College Course	Remarks
ain No.	25.02.1972	20.04.1995	20.09.2011	49	15.04.2014	15.04.2016	05.12.016	22.03.2018	05.10.2021	-
30/MR	12.12.1970	16.05.1994	20.09.2011	57	15.04.2014	15.04.2016	05.12.016	22.03.2018		
531/MR	20.02.1971	27.06.1991	20.09.2011	61	15.04.2014	15.04.2016	05.12.016	22.03.2018	Selected for Upper College Course with effect from 10.04.2022	
Ahmad	06.03.1976	16.11.1995	20.09.2011	73	15.04.2014	15.04.2016	05.12.016	22.03.2018		Dismissed from Service vide DPO/Nowshera OB: No. 1015 dated 29.09.2021.  Re-instated into service vide CPO/Peshawar Order No. S/1426-32/22 dated 06.07.2022.
533/MR	04.02.1970	29.03.1992	20.09.2011	74	15.04.2014	15.04.2016	05.12.016	22.03.2018	05.10.2021	-
MR	04.02.1976	15.01.1995	20.09.2011	77	15.04.2014	15.04.2016	05.12.2016		Selected for Upper College Course with effect from 10.04.2022	Restored to his original rank of ASI vide DPO/Mardan OB: No. 941 dated 29.04.2019
5/MR	25.08.1971	25.06.1994	20.09.2011	82	12.11.2014	12.11.2016	05.12.016	22.03.2018	05.10.2021	Assigned revised seniority as ASI with his colleagues vide Peshawar High Court Judgment dated 24.12.2014.
7/MR	01.01.1972	29.06.1993	20.09.2011	83	02.07.2015	02.07.2017	15.01.2018	-	05.10.2021	Granted his due Inter-se Seniority

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S#	Name & No	Date of Birth	Date of Enlistment	Date of admission into list "D"	Order of merit of Intermediate Result	Date of Promotion as Offg: ASI	Date of confirmation as ASI	Date of entry to list "E"	Date of Promotion as Offg: SI	Date of Upper College Course	Remarks
											with their colleagues with whom they underwent Intermediate College Course as per orders of merit issued by PTC Hangu in the DPC held in this office on 18.06.2019
16.	Offg: SI Ziad Muhammad No. 536/MR	10.05.1976	06.11.1995	20.09.2011	92	28.12.2015	28.12.2017	28.12.2017	20.06.2018		Dismissed from service
17.	Offg: SI Yaseen Shah No. 537/MR	26.08.1971	12.05.1994	20.09.2011	96	15.04.2014	15.04.2016	05.12.016	22.03.2018	Selected for Upper College Course with effect from 23.10.2021.	
18.	Offg: SI Amjad Ali No.538/MR	30.03.1970	22.01.1995	20.09.2011	97	15.04.2014	15.04.2016	05.12.016	22.03.2018	Selected for Upper College Course with effect from 10.04.2022	
19.	Offg: SI Naeem Khan No. 539/MR (Number vacant)	11.03.1971	13.12.1994	20.09.2011	103	12.11.2014	12.11.2014	05.12.016	22.03.2018		Assigned revised seniority as ASI with his colleagues vide Peshawar High Court Judgment dated 24.12.2014. Died due to his natural death vide DD No. 23 dated 16.01.2022 Police Lines, Mardan vide DPO/Mardan Notification No. 444/EC dated

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S#	Name & No	Date of Birth	Date of Enlistment	Date of admission into list "D"	Order of merit of Intermediate Result	Date of Promotion as Offg: ASI	Date of confirmation as ASI	Date of entry to list "E"	Date of Promotion as Offg: SI	Date of Upper College Course	Remarks
											20.01.2022.
20.	Offg: SI Jehandad No. 540/MR	14.03.1971	10.04.1995	20.09.2011	118	15.04.2014	15.04.2016	05.12.2016	22.03.2018	Selected for Upper College Course with effect from 23.10.2021.	
21.	Offg: SI Muhammad Jehangir No. 648/MR	01.04.1973	20.07.1994	20.09.2011	124	15.04.2014	15.04.2016	05.12.2016	20.06.2018	Selected for Upper College Course with effect from 23.10.2021.	
22.	Offg: SI Faiz Muhammad No. 541/MR	02.02.1974	09.10.1994	20.09.2011	131	15.04.2014	15.04.2016	05.12.2016	20.06.2018	Selected for Upper College Course with effect from 10.04.2022	
23.	Offg: SI Ajmal Khan No. 542/MR	12.02.1971	13.08.1991	20.09.2011	135	15.04.2014	15.04.2016	05.12.2016	20.06.2018	Selected for Upper College Course with effect from 23.10.2021.	
24.	Offg: SI Amjid Ali No. 544/MR	02.02.1971	09.03.1990	20.09.2011	147	28.12.2015	28.12.2017	28.12.2017	20.06.2018		
25.	Offg: SI Fazal Hussain No. 545/MR	20.09.1970	01.07.1990	20.09.2011	153	15.04.2014	15.04.2016	05.12.2016	20.06.2018	Selected for Upper College Course with effect from 23.10.2021.	
26.	Offg: SI Raza Khan No. 546/MR	12.05.1971	01.07.1991	20.09.2011	155	15.04.2014	15.04.2016	05.12.2016	20.06.2018	Selected for Upper College Course with effect from 23.10.2021.	

15451/E-3

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Office of the Deputy Commandant  
RRF, Khyber Pakhtunkhwa Peshawar.

No. 208 /RRF

Dated: 15/02/2022.

To: The AIG/Establishment  
CPO, Khyber Pakhtunkhwa Peshawar.


Subject: REQUEST / APPLICATION

Memo: Kindly find enclosed an application submitted by ASI Khalid Khan posted at RRF  
Unit No. 01 Peshawar and requested therein for seniority.

Submitted for favour of consideration & further necessary action, please.

2-11  
15-02-22

662  
22-2-22

  
TARIQ IQBAL (NPMLBAR)  
Deputy Commandant,  
RRF, Khyber Pakhtunkhwa Peshawar.


SE-III  
15/02

OFFICE OF THE INSPECTOR GENERAL OF POLICE,  
KHYBER PAKHTUNKHWA, PESHAWAR.


No. 364 /E-III, Dated Peshawar, the 21/02/2021

Copy of above is alongwith enclosures are forwarded to the Regional Police  
Officer, Mardan Range, Mardan for comments, please.

EC/dpo, mardan  
For comments please

  
(NOOR AFGHANI)  
Registrar  
For Inspector General of Police,  
Khyber Pakhtunkhwa,

No-1438/ES  
OHS 22-2-22

  
RPO/Mardan  
22-2-2022

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SUBJECT: APPLICATION FOR FIXATION OF "DUE SENIORITY WITH MY BATCH MATES TERM ENDING ON 20.09.2011 INTERMEDIATE COLLEGE COURSE"

Respected Sir,

With due respect it is humbly submitted that the applicant was transferred to his home region under Standing Order No. 02/2016 titled "Quotas of Districts in Central Units" vide order No. 2274-76/E-IV dated 24.02.2016. According to which para "4" stated that recruitment promotions from the rank of Constable to Sub-Inspector will be carried out and regulated in the concerned district and regions to whom the individual is transferred. But unfortunately I was deprived from my legal right and have placed at the bottom of intermediate qualified head Constables. Who were passed out in 2016. As I have completed my Intermediate Course in September, 2011. According to Police Rules Chapter 14-7 promotion to the rank of ASI will be carried out according to the list maintained in Regions and the Individual will be the resident of respective region and Seniority will be reckoned from the date of qualification of intermediate college course.

So it is requested that the applicant may kindly granted due Seniority with his Colleagues.

~~10/11/2016~~  
14/2/2016  
Yours Sincerely,  
ASI Khalid Khan No. MR/85  
Rapid Response Force, Peshawar (RRF)

Annexed with:

- a) Result of Intermediate College Course.
- b) Standing Order No. 02/2016.
- c) History Sheet.
- d) Domicile.

**VAKALAT NAMA**

NO. \_\_\_\_\_/20

IN THE COURT OF KP Service Tribunal, Peshawar

Khalid Khan

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Deptt

(Respondent)  
(Defendant)

I/We, Khalid Khan

Do hereby appoint and constitute **Mr. M. Asif Yousafzai, ASC** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/20

Khalid Khan  
(CLIENT)

ACCEPTED

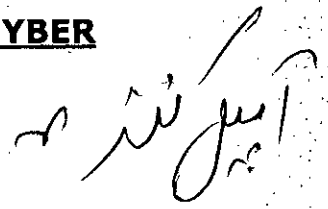
M. Asif Yousafzai  
M. ASIF YOUSAFZAI, ASC,

Syed Noman Ali Bukhari  
SYED NOMAN ALI BUKHARI  
Advocate High Court Peshawar

SHAHKAR KHAN YOUSAFZAI  
ADVOCATE.



**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR.**



**Service Appeal No. 1890/2022**

Khalid Khan ASI No. 85/MR Rapid Response Force, Peshawar (RRF)

.....Appellant.

**VERSUS**

The Regional Police Officer, Mardan and others.....Respondents.

**Index**

S. No.	Description of Documents	Annexure	Pages.
1.	Copy of Written Reply.	--	1-2
2.	Copy of Affidavit.	--	3
3.	Copy of Authority Letter.	--	4

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR.**

Service Appeal No. 1890/2022

Khalid Khan ASI No. 85/MR Rapid Response Force, Peshawar (RRF)

.....Appellant.

**V E R S U S**

The Regional Police Officer, Mardan and others.....Respondents.

**Para-wise comments by respondents:-**

Respectfully Sheweth,

**PRELIMINARY OBJECTIONS**

1. That the appellant has not approached this Hon'ble Tribunal with clean hands.
2. That the appellant has concealed the actual facts from this Hon'ble Tribunal.
3. That the appellant has got no cause of action or locus standi to file the instant appeal.
4. That the appellant is estopped by his own conduct to file the instant Service Appeal.
5. That the appeal is unjustifiable, baseless, false and vexatious and the same is liable to be dismissed with special compensatory cost in favour of respondents.
6. That the appeal is bad for miss-joinder and non-joinder of necessary parties.

**Reply on Facts**

1. Para to the extent of enlistment in Police Department pertains to record needs no comments. While rest of para is incorrect, because every Police Officer is under obligation to perform his duty upto the entire satisfaction of his superiors.
2. Para to the extent of completion of requisite/mandatory and professional trainings pertains to record needs no comments.
3. Correct to the extent that Standing Order No. 02/2016 was issued according to which Regions/Districts have been accorded share in different ranks in Central Units.
4. Correct to the extent that the appellant was promoted as officiating ASI in the Departmental Promotion Committee meeting held in Region Office Mardan dated 20.09.2019 and subsequently confirmed in the same rank after fulfillment of all legal and codal formalities including completion of probation period as enunciated in Police Rules 1934 Chapter 13 and his name was brought on promotion list "E" with immediate effect.
5. Para to the extent of getting knowledge by the appellant regarding promotion of his batch is not related needs no comments while para regarding filing application is correct as the application of the appellant was received by the office of respondent No. 04 but then of the appellant was attached to Mardan Region vide Central Police Office Peshawar order No. 2274-76/E-IV dated 24.02.2016 with the condition of according bottom seniority while placing his name on promotion list "D". Hence, the appellant was promoted as officiating Assistant Sub Inspector and subsequently confirmed in accordance with order of merit/seniority. However, para to the extent of not handing over the rejection

order to the appellant is not plausible rather he has taken this plea just to save his skin from the issue of limitation.


6. That appeal of the appellant is liable to be dismissed on the following grounds amongst the others.


**REPLY ON GROUNDS:**

- A. Incorrect. Stance of the appellant is totally devoid of merit because the appellant has been promoted to the rank of officiating ASI in accordance with his seniority accorded to him in light of lien transfer order, hence the same is in accordance with facts, law, rules, norms of justice and fair play therefore the same is liable to be maintained.
- B. Incorrect. Plea taken by the appellant is totally ill based as discussed earlier he has been promoted on account of his turn.
- C. Para already explained needs no comments.
- D. Incorrect. The appellant has not been deprived of any of his right because the respondent department has no grudges against him.
- E. Para explained earlier needs no comments.
- F. Plea taken by the appellant is not plausible because every case has its own facts and circumstances, therefore, the instant issue does not fall within the ambit of judgment mentioned by the appellant.
- G. Para already explained needs no comments.
- H. Plea taken by the appellant is bereft of any substance.
- I. The respondents also seek permission of this honorable tribunal to adduce additional grounds at the time of arguments.

**PRAYER:-**

Keeping in view the above narrated facts, it is most humbly prayed that the appeal of the appellant being badly barred by law and limitation, may kindly be dismissed with costs please.

  
Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No. 01)

  
AIG/Establishment CPO,  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No. 02)

  
Deputy Commandant, FRP  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No. 03)

  
Regional Police Officer,  
Mardan.  
(Respondent No. 4)

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR.**

**Service Appeal No. 1890/2022**

Khalid Khan ASI No. 85/MR Rapid Response Force, Peshawar (RRF)

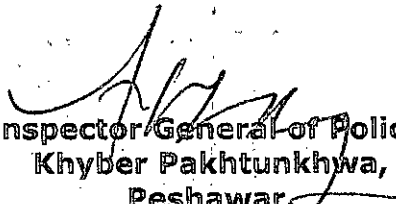
.....Appellant.


**VERSUS**


The Regional Police Officer, Mardan and others.....Respondents.

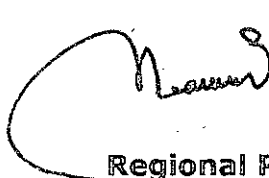
**COUNTER AFFIDAVIT.**

We, the respondents do hereby declare and solemnly affirm on oath that the contents of the Para-wise comments in the service appeal cited as subject are true and correct to the best of our knowledge and belief and nothing has been concealed from this Honourable Tribunal.

  
Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.  
(Respondent No. 01)

  
AIG/Establishment CPO,  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No. 02)

  
Deputy Commandant, FRP  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No. 03)

  
Regional Police Officer,  
Mardan.  
(Respondent No. 4)

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR.**

**Service Appeal No. 1890/2022**

Khalid Khan ASI No. 85/MR Rapid Response Force, Peshawar (RRF)

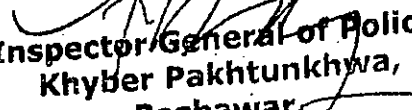
.....Appellant.

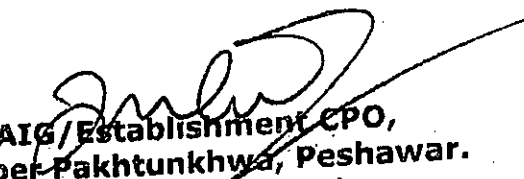
**VERSUS**


The Regional Police Officer, Mardan and others.....Respondents..

**AUTHORITY LETTER.**

Mr. Atta-ur-Rehman Inspector Legal Branch, (Police) Mardan is hereby authorized to appear before the Honourable Service Tribunal, Khyber Pakhtunkhwa, Peshawar in the above captioned service appeal on behalf of the respondents. He is also authorized to submit all required documents and replies etc. as representative of the respondents through the Addl: Advocate General/Govt. Pleader, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

  
**Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.**  
(Respondent No. 01)

  
**AIG/Establishment CPO,  
Khyber Pakhtunkhwa, Peshawar.**  
(Respondent No. 02)

  
**Deputy Commandant, FRP  
Khyber Pakhtunkhwa, Peshawar.**  
(Respondent No. 03)

  
**Regional Police Officer,  
Mardan.**  
(Respondent No. 4)