



The
PESHAWAR HIGH COURT
Peshawar

Ph: No. 091-9210149-58

No. 79123 (1)/240/2023/WP-MN

Dated. 05-September-2023

From

Deputy Registrar (J),
Peshawar High Court,
Peshawar.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7381

Dated 6/9/2023

To

✓ The Chairman, Khyber Pakhtunkhwa, Service Tribunal, Peshawar.

Subject: Writ Petitions W.P 1222/2022 Title: Ijaz Ahmad VS Govt of KPK and Others

Memo,

I am directed to send herewith the titled case in original alongwith all annexures and judgment of this Honble Court dated 29.08.2023 for compliance.


Deputy Registrar (J)

6/9/23

Encl: As above.

(11)

JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

W.P. No.1222-A/2022

Ijaz Ahmed

Vs.

**Government of Khyber Pakhtunkhwa through Chief
Secretary, Peshawar and others**

Date of hearing 22.06.2023
Date of Announcement 29-08-23 .

Petitioner(s) by: Nemo.

Respondent(s) by: Mr. Amir Javed, Advocate General
Khyber Pakhtunkhwa, for the
respondents alongwith Mr. Rizwan
Manzoor, DIG (HQ), Muhammad Asif,
AIG (Legal) and Muhammad Tariq
Usman, Inspector (Legal), Central Police
Office, Khyber Pakhtunkhwa.

JUDGMENT

IJAZ ANWAR, J. This writ petition is filed under Article
199 of the Constitution of Islamic Republic of Pakistan, 1973,
with the following prayer:-

*“Under the circumstances, it is very respectfully
prayed that on acceptance of the instant writ
petition, the impugned Notification No.SO(E-
I)E&Ad/2-4/2022 dated 05.09.2022 may kindly be
set-aside and the respondents concerned be directed
to promote the petitioner to the rank of S.P. (BPS-
18) w.e.f. the date of promotion vide Notification
dated 05.09.2022. Any other relief which this
Honourable Court deems appropriate in the facts
and circumstances of the case may also be granted
to the petitioner.*

2. Comments were called from the respondents
who furnished the same, wherein, they opposed the issuance of
desired writ asked for by the petitioner.

3. Arguments heard and record perused.
4. In the instant matter, the petitioner has questioned the promotion of the private respondents issued vide Notification 05.09.2022 allegedly considering that all these private respondents were junior to him and he has been illegally deprived of his promotion.
5. Since the petitioner has questioned the promotion orders of the private respondents and claiming his promotion which squarely falls within the terms and conditions of service of the petitioner. In the instant matter, petitioner has duly submitted his departmental appeal, besides, comments have already been submitted and the case is ripe. As such, we instead of dismissing the instant writ petition, treat it as Service Appeal and send it to the Khyber Pakhtunkhwa Service Tribunal for its decision in accordance with law. Office shall retain copies of the memo of this writ petition for the purpose of record.

Announced
Dt: 29-8-23.


JUDGE


JUDGE

(DB) Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice Syed Muhammad Atique Shah

IN THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH
OPENING SHEET FOR WRIT BRANCH

Case No. _____

Date of Filing: _____

District: _____

Case Type: C.O.C

Category Code:

Nature of Original Proceedings:

(Categories & Sub Categories are given at the back of the opening sheet)

Review/ Contempt of Court in respect of

Writ of;

Heabus Corpus	<input type="checkbox"/>	Prohibition	<input type="checkbox"/>	Mandamus	<input type="checkbox"/>	Quo Warranto	<input type="checkbox"/>	Certiorari	<input type="checkbox"/>
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If Certiorari;

Forum	Date	Interlocutory /Final Order	Caste Pertains to
			<input type="checkbox"/> SB
			<input type="checkbox"/> DB

Petitioner Name	Ijaz Ahmed son of Abdul Ghafar Khan.
Mobile No.	
Address	Presently serving as acting Superintendent of Police Investigation at Torghar.
CNIC No.	
Email Address	

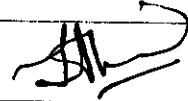
Counsel for Petitioner(s)	Faraz Ahmed, Advocate High Court, Abbottabad
Mobile No.	0321-9814650
Address	Office at District Courts, Abbottabad
CNIC No.	13503-2878518-5
Email Address	adv.faraz@gmail.com

Respondent(s)	Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar & others.
Address	District Health Officer Kohistan Lower Pattan.

Original Order/ Action/ Inaction Complained of;	Petition under Article 204 of the Constitution of Islamic Republic of Pakistan, 1973.
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Prayer;	On acceptance of instant writ petition, the impugned Notification No. SO(E-I)E&Ad/2-4/2022 dated 05/09/2022 may kindly be set aside and the respondents concerned be directed to promote the petitioner to the rank of S.P (BPS-18) w.e.f the date of promotion vide Notification dated 05/09/2022. Any other relief which this Honourable court deems appropriate in the facts and circumstances of the case may also be granted to the petitioner.
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Law/Rules/Governing the original proceedings/action/Inaction	1. Constitution of Islamic Republic of Pakistan, 1973 2. 3. Other relevant case law will be cited at the bar.
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Signature: 

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

Service Appeal no. 1794/2023

Writ Petition No. 1222-A/2022

Ijaz Ahmed son of Abdul Ghafar Khan, Presently serving as acting Superintendent of Police Investigation at Torghar.

...PETITIONER

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar & others.

...RESPONDENTS

WRIT PETITION

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...PETITIONER

Dated: 22/09 /2022

Through

FILED FOR
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

23 SEP 2022

Sign:

(FARAZ AHMED)

Advocates High Court, Abbottabad

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

Service Appeal No. 1794/2023

Writ Petition No. 1222-A/2022

Ijaz Ahmed son of Abdul Ghafar Khan, Presently serving as acting Superintendent of Police Investigation at Torghar.


...PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar.
2. Secretary Home and Tribal Affairs Khyber Pakhtunkhwa, Peshawar.
3. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
4. Additional IGP Establishment for Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
5. Additional IGP Headquarters for Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
6. Regional Police Officer Hazara Region, Abbottabad.
7. Mr. Falak Niaz at serial No. 13 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 26 of Final Seniority List No. 1594/SE-I dated 05/08/2022.
8. Mr. Tajamul Khan at serial No. 14 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 27 of Seniority List No. 1594/SE-I dated 05/08/2022.
9. Mr. Tariq Habib at serial No. 15 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 28 of Seniority List No. 1594/SE-I dated 05/08/2022.
10. Mr. Nisar Ahmad at serial No. 16 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 29 of Seniority List No. 1594/SE-I dated 05/08/2022.
11. Mr. Tariq Iqbal at serial No. 17 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 30 of Seniority List No. 1594/SE-I dated 05/08/2022.
12. Mr. Aslam Nawaz at serial No. 18 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 31 of Seniority List No. 1594/SE-I dated 05/08/2022.
13. Mr. Ishtiaq Ahmad at serial No. 19 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 32 of Seniority List No. 1594/SE-I dated 05/08/2022.

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14. Mr. Iftikhar Shah at serial No. 20 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 35 of Seniority List No. 1594/SE-I dated 05/08/2022.
15. Mr. Noor Jamal at serial No. 21 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 36 of Seniority List No. 1594/SE-I dated 05/08/2022.
16. Mr. Syed Mukhtiar Shah at serial No. 22 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 37 of Seniority List No. 1594/SE-I dated 05/08/2022.
17. Mr. Nazir Ahmad at serial No. 23 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 38 of Seniority List No. 1594/SE-I dated 05/08/2022.
18. Mr. Saeed Akhtar at serial No. 24 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 39 of Seniority List No. 1594/SE-I dated 05/08/2022.
19. Mr. Muhammad Ishtiaq at serial No. 25 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 41 of Seniority List No. 1594/SE-I dated 05/08/2022.
20. Mr. Muhammad Mahroof at serial No. 26 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 42 of Seniority List No. 1594/SE-I dated 05/08/2022.
21. Mr. Muhammad Ayaz at serial No. 27 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 43 of Seniority List No. 1594/SE-I dated 05/08/2022.
22. Mr. Muhammad Jameel Akhtar at serial No. 28 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 44 of Seniority List No. 1594/SE-I dated 05/08/2022.
23. Mr. Abdul Hai at serial No. 29 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 45 of Seniority List No. 1594/SE-I dated 05/08/2022.
24. Syed Inayat Ali Shah at serial No. 30 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 46 of Seniority List No. 1594/SE-I dated 05/08/2022.
25. Mr. Niaz Muhammad at serial No. 31 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 47 of Seniority List No. 1594/SE-I dated 05/08/2022.
26. Mr. Hameeduallah at serial No. 32 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 48 of Seniority List No. 1594/SE-I dated 05/08/2022.
27. Mr. Sajjad Ahmad at serial No. 33 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 49 of Seniority List No. 1594/SE-I dated 05/08/2022.
28. Mr. Shah Hussain at serial No. 34 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 50 of Seniority List No. 1594/SE-I dated 05/08/2022.
29. Mr. Nazir Khan at serial No. 35 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 51 of Seniority List No. 1594/SE-I dated 05/08/2022.

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30. Mr. Sajjad Ahmad Sahibzada at serial No. 36 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 52 of Seniority List No. 1594/SE-I dated 05/08/2022.
31. Mr. Muzamil Shah at serial No. 37 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 53 of Seniority List No. 1594/SE-I dated 05/08/2022.
32. Mr. Mushtaq Ahmad at serial No. 38 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 54 of Seniority List No. 1594/SE-I dated 05/08/2022.
33. Mr. Shaukat Ali at serial No. 39 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 55 of Seniority List No. 1594/SE-I dated 05/08/2022.
34. Mr. Abdul Samad at serial No. 40 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 56 of Seniority List No. 1594/SE-I dated 05/08/2022.
35. Mr. Muhammad Khalid at serial No. 41 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 57 of Seniority List No. 1594/SE-I dated 05/08/2022.
36. Mr. Zia Hassan at serial No. 42 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 58 of Seniority List No. 1594/SE-I dated 05/08/2022.
37. Mr. Shafiullah at serial No. 43 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 & at serial No. 60 of Seniority List No. 1594/SE-I dated 05/08/2022.
38. Mr. Sohail Afzal at serial No. 44 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022.
39. Mr. Mir Faraz at serial No. 45 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022.
40. Mr. Muhammad Asif at serial No. 46 of Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022.

(Respondents No. 7 to 40 be served through respondent No. 3)

...RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199 OF
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973 SEEKING DECLARATION/
DIRECTION TO THE EFFECT THAT THE
NOTIFICATION NO. SO(E-I)E&AD/2-4/2022 DATED**

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PESHAWAR HIGH COURT
ABBOTTABAD BENCH**

05/09/2022 ISSUED BY DEPARTMENTAL SELECTION BOARD/ APPROVED BY COMPETENT AUTHORITY IS APPARENTLY ILLEGAL, UNLAWFUL, ARBITRARY, BASED ON MALAFIDE, PERVERSE, VOID-AB-INITIO, CONTEMPTUOUS, AGAINST THE NORMS OF JUSTICE AND SHEER VIOLATION OF PROVISION OF CONSTITUTION IBID AND AGAINST THE DECISION MADE BY LARGER BENCH OF THIS HONOURABLE COURT IN WRIT PETITION NO. 684-A/2021 IN WHICH THIS HONOURABLE COURT WAS PLEASED TO DIRECT THE PROVINCIAL GOVERNMENT OF KPK, "FIRSTLY TO CLARIFY ITS POSITION WHETHER IT WANTS TO CONTINUE WITH THE MATTER OF AWARDING ACCELERATED POSITIONS TO MEMBERS OF ITS POLICE FORCE IN LINE WITH THE KHYBER PAKHTUNKHWA VALIDATION OF STANDING ORDER ACT 2005, PREVAILING POLICE RULES AND KHYBER PAKHTUNKHWA POLICE ACT 2017 OR NOT AND THEN DECIDE THE ISSUE RAISED IN THE PETITIONS ACCORDINGLY BUT TILL SUCH POLICY IS STREAM LINED, NO ADVERSE ACTION SHALL BE TAKEN AGAINST THE PETITIONERS". THE RESPONDENTS WITHOUT DISCONTINUING THE

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 ABBOTTABAD BENCH
 27/9/22

POLICY OF CADETSHIP/ ACCELERATED PROMOTION AND DESPITE OF ISSUING FINAL SENIORITY LIST OF DSSP (BS-17) OF KPK POLICE VIDE SENIORITY LIST NO. 1594/SE-I DATED 05/08/2022, THE RESPONDENT DEPARTMENT DID NOT PROMOTE THE PETITIONER ON THE BASIS OF HIS SENIORITY CUM FITNESS TO THE RANK OF SP (BS-18) AND PROMOTED RESPONDENTS NO. 7 TO 40 DESPITE BEING JUNIORS TO THE PETITIONER AS PER FINAL SENIORITY LIST MENTIONED ABOVE. THE ACTS OF RESPONDENTS CONCERNED MAY GRACIOUSLY BE ORDER TO BE DECLARED NULL AND VOID BEING VIOLATIVE OF DECISION OF THIS HONOURABLE COURT AND AGAINST THE SENIORITY LIST AND THE PETITIONER BE PROMOTED BEING QUALIFIED BY ALL MEANS TO THE RANK OF SP (BS-18) WITH EFFECT FROM THE DATE OF ISSUING OF IMPUGNED NOTIFICATION. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEMS APPROPRIATE IN THE FACTS AND CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE PETITIONER.

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Respectfully Sheweth: -

The brief facts leading to the present writ petition are as under;

1. That the petitioner joined the Police Department as constable and having unblemished service record to the entire satisfaction of high officers promoted upto the rank of Sub-Inspector.
2. That the petitioner was promoted as Inspector on 19/07/2007 vide Notification No. 16568. Copy of Notification is attached as Annexure "A".
3. That the petitioner was confirmed as Inspector vide Notification No. 4178 dated 11/02/2014 alongwith his other colleagues with effect from 28/01/2010. Copy of Notification is attached as Annexure "B".
4. That the petitioner was promoted as DSP vide Notification No. 1092 dated 12.09.2014 During service the petitioner was assigned different duties and proved his commitments with honesty and full

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ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
PESHAWAR

dedication. The service record of the petitioner is self explanatory in this respect.

5. That the respondent No. 4 issued final seniority list of DSsP BS-17 of Khyber Pakhtunkhwa Police No. 1594/SE-I dated 05/08/2022 in which the petitioner is placed at serial No. 23. Copy of final seniority list is attached as Annexure "C".
6. That as per SOPs and the internal correspondence of the department, the department called the meeting of departmental selection board to examine the promotion cases of DSsP (BS-17) to the rank of SsP (BS-18) vide Notification No. CPO/CPB/DSB/252 dated 18/08/2022. Copy of Notification dated 18/08/2022 is attached as Annexure "D".
7. That upon the recommendation of departmental selection board in its meeting held on 19/08/2022 and subsequent approval of the competent authority a list of promotees was issued vide Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022, in which officers mentioned at serial

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No. 13 to 46 Juniors to the petitioner were promoted and vide Para No. 3 of the said impugned Notification their promotions were made subject to the decision of superior judiciary and cabinet regarding the issue of "out of turn promotion" and absorption in Khyber Pakhtunkhwa Police from other provinces/department. Copy of Notification dated 05/09/2022 is attached as Annexure "E".

8. That the petitioner upon information of meeting of the Department Promotion Board approached the department for redressal of his grievance by filing representation but no such reply/ action has so far been taken by the department upon presentation of the petitioner. Copy of representation is annexed as Annexure "F".
9. That feeling aggrieved by the Notification No. SO(E-I)E&AD/2-4/2022 dated 05/09/2022 the petitioner approaches this Honourable Court through the instant writ petition on the following amongst other grounds;-

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ABBOTABAD BENCH
M 9/1

GROUNDS:-

- a. That the petitioner gained the accelerated promotion and obtained the present position through sheer hard work, labour and ability. As regards the benefits acquired by the petitioner through the incentive policy, it was only the opportunity offered to every one equally. Petitioner happened to best utilize the opportunity, thus, qualified for accelerated promotion having placed himself on higher pedestal of fitness irrespective of position on seniority list, amongst those officers who are junior to the petitioner as per final seniority list.
- b. That the fundamental question out of the situation is to see whether petitioner should be penalized for his better performance just because the competent authorities continued acting in the light of the incentive policy. Law does not envisage punitive action against one of lapses of another. The present position of the petitioner reveals question of

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reverted rights which cannot be taken away irrespective of due course followed therefore. Hence the impugned Notification dated 05/09/2022 is untenable at law and facts.

- c. That the impugned notification ex-facie indicates adoption of easy path to correct an error at higher level. As such the impugned notification being untenable at law and facts and is liable to be set aside and unimplementable.
- d. That being senior in the seniority list from the respondents No. 7 to 40, the petitioner was entitled to be promoted from the rank of DSP (BS-17) to the rank of S:P (BS-18) on the basis of seniority cum fitness criteria, but the respondents did not comply with the requirements of law and policy, which is ineffective upon the rights of the petitioner, hence, impugned notification is liable to be set aside.

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M. M.

e. That the larger bench of Honourable Peshawar High Court in writ petition No. 684-A/2021 in its order announced on 24/03/2022 directed the government "firstly to clarify its position whether it wants to continue with the matter of awarding accelerated positions to members of its police force in line with the Khyber Pakhtunkhwa validation of standing order Act 2005, prevailing Police Rules and Khyber Pakhtunkhwa Police Act 2017 or not and then decide the issue raised in the petitions accordingly but till such policy is stream lined, no adverse action shall be taken against the petitioners" but the said directions has not still been implemented and proceeded by the respondent department and the Government.

f. That in the light of said judgment of larger bench of Honourable Peshawar High Court the policy i.e. standing order No. 11 of 1987 and validation of standing order Act of 2005, alongwith all other relevant provisions

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M/91

of law through which the petitioner alongwith others got their present positions in the department, are still holding the field and the government has not declared its policy in respect of those enactments in the light of judgment dated 24/03/2022, so the department by not promoting the petitioner on the basis of his seniority cum fitness criteria and by promoting the officers at serial No. 13 to 46 of the impugned notification who are juniors to the petitioner has acted in discriminatory and contemptuous manner and on the basis of malafide, hence the impugned notification is untenable in the eye of law. Copy of judgment announced on 24/03/2022 in writ petition No. 684-A/2021 by the larger bench of Honourable Peshawar High Court is annexed as Annexure "G".

- g. That the judgment of the Honourable Supreme Court of Pakistan reported as 2017 SCMR 206 which is made basis in the impugned Notification is distinguishable and

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 27/03/2022

not applicable to the case of the petitioner, because in that judgment the subject matter was of the officials who gained out of turn promotion under Section 8-A of Punjab Civil Servants Act 1974 and Section 9-A of Sindh Civil Servants Act 1973. It can be seen in that judgment that all the officials got out of turn promotion on the basis of police encounters or under sports policy, without any qualification/ courses/ examination, while the petitioners' promotion is justified due to the fact that certain qualification/ courses/ examination have been prescribed in the incentive policy in order to be qualified for such promotions.

- h. That the official respondents were under obligation not to pass any adverse order against the petitioner in presence of Act of 2005 which merged the standing order in it and judgment of larger bench of this Honourable Court.
- i. That as the contents of impugned notification would reveal that the official

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27/11/20

respondents are poised to revert the petitioner to far lower level which would subject him to irreparable loss and hardship.

Therefore, restraining the respondents from acting upon the impugned notification would be in the better interest of justice.

- j. That no other alternate, efficacious and speedy remedy is available to the petitioner except the instant constitutional petition.
- k. That notice/ intimation of filing the instant writ petition against the respondents has duly been served upon the respondents through registered post. Copies of notice & receipt are attached as Annexure "H".
- l. That the valuable rights of the petitioner are involved in the matter.
- m. That the other points shall be agitated at the time of arguments with the permission of this Honourable Court.
- n. That court fee stamps worth Rs. 500/- is annexed with the petition.

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ABBOTTABAD BENCH
M 9/11

Under these circumstances, it is very respectfully prayed that on acceptance of instant writ petition, the impugned Notification No. SO(E-I)E&Ad/2-4/2022 dated 05/09/2022 may kindly be set aside and the respondents concerned be directed to promote the petitioner to the rank of S.P (BPS-18) w.e.f the date of promotion vide Notification dated 05/09/2022. Any other relief which this Honourable court deems appropriate in the facts and circumstances of the case may also be granted to the petitioner.

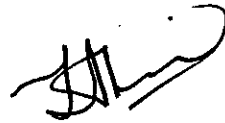
INTERIM RELIEF;

In the meanwhile, the operation of impugned Notification No. SO(E-I)E&Ad/2-4/2022 dated 05/09/2022 may kindly be suspended till final decision of tilted writ petition.

Dated: 22/09 /2022

Through

...PETITIONER

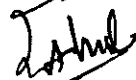


(FARAZ AHMED)

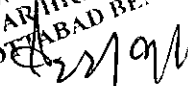
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...PETITIONER

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH


BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

Writ Petition No. _____ -A/2022

Ijaz Ahmed son of Abdul Ghafar Khan, Presently serving as acting Superintendent of Police Investigation at Torghar.

...PETITIONER

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar & others.

...RESPONDENTS

WRIT PETITION

AFFIDAVIT

I, *Ijaz Ahmed son of Abdul Ghafar Khan, Presently serving as acting Superintendent of Police Investigation at Torghar*, do hereby declare on oath that the contents of foregoing writ petition are true and correct to the best of my knowledge and belief and that nothing has been suppressed from this Honourable Court.

13503-0650939-5

Ijaz Ahmed
DEPONENT

S.No: 7824/976 Receipt No: 476

Certified that the above was verified on Solemn affirmation Yes before me on this 21 day of Oct 2002

Ijaz Ahmed
Signed & verified by Ijaz Ahmed
of Police Investigation Torghar
who is personally known to me

Oath Commissioner
(Additional Registrar)
Peshawar High Court Abbottabad Bench

21/10

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
4/27/02

PAKISTAN National Identity Card
 ISLAMIC REPUBLIC OF PAKISTAN

Name
 Ijaz Ahmed

Father Name
 Abdul Ghaffar Khan

Gender: M Country of Stay: Pakistan

Identity Number: 13503-0650939-5 Date of Birth: 05.04.1963

Date of Issue: 23.10.2020 Date of Expiry: Lifetime

Holder's Signature

10284

13503-0650

ممبر ہوتے ہوئے ہاؤس ہالنگ قابل الیکٹریسیٹی سہولتوں شہر
 ہاؤس ہالنگ، کھلی، تحصیل و ضلع لیٹ آباد

101931099
 123-55-55

محمد علی جناح ایئرپورٹ ہاؤس ہالنگ قابل الیکٹریسیٹی سہولتوں شہر
 ہاؤس ہالنگ، کھلی، تحصیل و ضلع لیٹ آباد

101931099
 123-55-55

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

Writ Petition No. _____ -A/2022

Ijaz Ahmed son of Abdul Ghafar Khan, Presently serving as acting Superintendent of Police Investigation at Torghar.

...PETITIONER

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar & others.

...RESPONDENTS

WRIT PETITION

CERTIFICATE


Certified that no such like writ petition has earlier been filed before this Honourable Court by the petitioner.

It is further certified that notice of writ petition alongwith grounds of writ has been dispatched to the respondents.

...PETITIONER

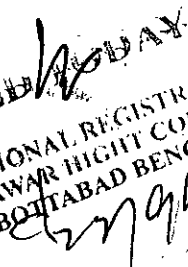
Dated: 22/09 /2022

Through



(FARAZ AHMED)

Advocates High Court, Abbottabad


ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

Writ Petition No. _____ -A/2022

Ijaz Ahmed son of Abdul Ghafar Khan, Presently serving as acting Superintendent of Police Investigation at Torghar.

...PETITIONER

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar & others.

...RESPONDENTS

WRIT PETITION

LIST OF BOOKS

1. Constitution of Islamic Republic of Pakistan 1973.
- 2.
3. Other law books shall be sited at Barr.

...PETITIONER

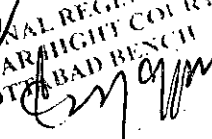
Dated: 22/09 /2022

Through



(FARAZ AHMED)

Advocates High Court, Abbottabad

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH


BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

Writ Petition No. _____-A/2022

Ijaz Ahmed son of Abdul Ghafar Khan, Presently serving as acting Superintendent of Police Investigation at Torghar.

...PETITIONER

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar & others.

...RESPONDENTS

WRIT PETITION

ADDRESSES OF THE PARTIES

Respectfully Sheweth:-

Addresses of the parties are as under:-

Addresses of the parties are correctly given in the heading of writ petition.

...PETITIONER


Dated: 22/09 /2022

Through



(FARAZ AHMED)

Advocates High Court, Abbottabad

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH


Annexure "B"

MB

21

Annexure

MB

B

FOR PUBLICATION IN THE KHYBER
PAKHTUNKHWA POLICE GAZETTE PART-II,
ORDERS BY THE INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA, PESHAWAR.


NOTIFICATION

Dated: 11 102 /2011

No. 4178 /E-II, CONFIRMATION AS INSPECTOR:-

In continuation to this office Notification No. 2739-49/E-II dated:
28.01.2010.

Offg: Inspector Ijaz Ahmed No. H/78 of Hazara Region on list "F" of Khyber
Pakhtunkhwa Police is hereby confirmed as Inspector with his colleagues with
effect from 28.01.2010.


(MIAN MUHAMMAD ASIF)
Addl: IGP/Headquarters
For Inspector General of Police,
Khyber Pakhtunkhwa
Peshawar

No. 4179-82 /E-II

Copy of above is forwarded for information and necessary
action to the:-

1. Deputy Inspector General of Police, Hazara Region.
2. Director ACE Khyber Pakhtunkhwa, Peshawar.
3. Office Supdt: Secret CFC.
4. U.O.P File.

92

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FOR PUBLICATION IN THE NWFP POLICE GAZETTE PART-II
ORDERS BY THE PROVINCIAL POLICE OFFICER NWFP, PESHAWAR.

NOTIFICATION

Dated: 28/1/2010

NO 2739 /E-II. CONFIRMATION AS INSPECTOR:

The following Offg. Inspectors on list "I" of NWFP Police are hereby confirmed as Inspector with immediate effect.

S/NO	RANK & NAMES
1.	Salah ud Din No. D/6 ✓
2.	Hidayat Ullah No. D/5 ✓
3.	Arbab Khan No. D/30
4.	Riaz ul Islam No. P/82
5.	Shoukat Aif No. MR/53 ✓
6.	Abdus Samad No. MR/54 ✓
7.	Muhammad Saddique No. H/77 ✓
8.	Naveed Abbas No. P/61
9.	Abdul Hayee No. D/1 ✓
10.	Usman Ghani No. B/113 ✓
11.	Muhammad Tahir Khan No. B/24
12.	Muhammad Nadeem No. D/2
13.	Zia Hassan No. D/1 ✓

External in
register smoothly

BA
30/1 No 1415 Dated 01/02/2010
2010 copy of above is forwarded
to DPO Kohistan for information
and file.

1162
30/1/10

7-13/10

File

EA
3/3/10

(ABDUL MAJEED KHAN MARWAT)
PSP

Add: IGP/Headquarters.
For Provincial Police Officer.
NWFP Peshawar.

No. 2739 /E-II. Dated Peshawar the 28/1/2010.

Copy of above is forwarded for information and necessary action to

the:-

1. Addl: Inspector General of Police, Investigation NWFP, Peshawar with 2 spare copies for publication in NWFP. Gazette Part-II.
2. Capital City Police Officer Peshawar.
3. All RPOs in NWFP.
4. Office Sup't: Secret, CPO. Peshawar with 13 spare copies for placing in their Character Roll Dossies.
5. U.O.P. File.

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OFFICE OF THE
PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA, PESHAWAR.
Dated Peshawar, the 12/09/2014.

NOTIFICATION

No. 1092 /E-II. In pursuance of the provisions contained in Section-5 of the Khyber Pakhtunkhwa (Promotion of Superintendent of Police and Deputy Superintendent of Police) Rules-2007, the Competent Authority i.e. Provincial Police Officer on recommendations of the Departmental Selection Committee meeting held on 01.09.2014 is pleased to promote the following Inspectors Executive (BS-16), Inspector Legal (BS-16) and Inspector PSI/FPB (BS16) to the rank of Deputy Superintendent of Police (BS-17) on regular basis with immediate effect.

2. The officers on promotion shall remain on probation for a period of one year in terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Their promotion will take effect from the date they actually assume the charge of higher responsibility:-

Inspectors Executive

No.	Name and No.
1.	Inspector Ijaz Ahmad, H/78 ✓
2.	Inspector Anjad Akhmal, H/79
3.	Inspector Noor Muhammad, K/81
4.	Inspector Ghulam Muhammad, M/173
5.	Inspector Hussain Gulzari, T/30
6.	Inspector Farid Ahmad, MK/07
7.	Inspector Muhammad Saeed, MK/39
8.	Inspector Muhammad Nawaz, H/40
9.	Inspector Khebir Muhammad, H/01
10.	Lady Inspector Nazia Nargen, H/02
11.	Lady Inspector Shahzad Nanshad, H/02
12.	Inspector Bahad Hussain, H/55
13.	Inspector Amir Hussain, H/87
14.	Inspector Riwan Habib, H/88
15.	Inspector Alam Zeb, H/91
16.	Inspector Muhammad Saldar, H/95

Inspectors Legal

1.	Inspector Legal Imtiaz Ali, D/27
2.	Inspector Legal Javed Ahmad, D/28
3.	Inspector Legal Ghulam Hussain, D/54

Inspector PSI/FPB

1.	Inspector PSI/FPB Muhammad Aslam Khan
----	---------------------------------------

on promotion their posting orders will be issued separately.

Sd/-
NASIR ICHAN DURRANI
Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

No. 1043-1127 /E-II, dated Peshawar, the 12/09/2014.

Copy of above is forwarded for information and necessary action, to:-

1. Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Govt. Khyber Pakhtunkhwa, B & AD Dept. Peshawar.
5. Secretary Govt. Khyber Pakhtunkhwa, Finance Dept. Peshawar.



C

24

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

FINAL SENIORITY LIST OF DSsP BS-17 OF KHYBER PAHTUNKHWA POLICE

Dated: 05/08/2022

No. 1594/ISE-I, The Final Seniority List of DSsP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
1.	Mr. Qaid Kamal	01.01.1963	Charsadda	01.01.1994	01.01.1996	07.11.2012
2.	Muhammad Aleem Jan	11.04.1967	Peshawar	30.01.1996	30.01.1998	24.01.2014
3.	Mr. Aamir Shahzad	09.08.1968	Peshawar	30.01.1996	30.01.1998	30.06.2011
4.	Mr. Muhammad Arif	10.03.1969	Peshawar	30.01.1996	30.01.1998	19.03.2012
5.	Mr. Waqar Ahmad	03.01.1968	Nowshera	01.04.1997	01.04.1999	19.03.2012
6.	Mr. Muhammad Shafiq	13.01.1963	Bannu	01.10.1997	01.10.1999	19.03.2012
7.	Mr. Muhammad Arif	22.04.1964	Bannu	01.10.1997	01.10.1999	07.11.2012
8.	Mr. Gul Naseeb	09.11.1968	Bannu	01.10.1997	01.10.1999	19.03.2012
9.	Mr. Sanaullah	10.01.1969	Lakki	01.10.1997	01.10.1999	31.03.2012
10.	Mr. Amir Muhammad Khan	07.01.1970	Buner	14.10.1997	14.10.1999	19.03.2012
11.	Mr. Ali Hassan	06.03.1965	K.Agency	28.01.1998	28.01.2000	24.08.2020
12.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	20.02.1998	20.02.2000	30.06.2011
13.	Mr. Tahir ur Rahman	28.02.1969	Haripur	20.06.1998	20.06.2000	19.03.2012
14.	Mr. Muhammad Suleman	28.07.1970	Mansehra	20.06.1998	20.06.2000	30.06.2011
15.	Mr. Janas Khan	10.02.1965	Abbottabad	20.06.1998	20.06.2000	20.01.2011
16.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	26.05.1987	20.06.2000	25.03.2013
17.	Mr. Asad Mehmood	08.03.1968	Swabi	-	07.09.2000	24.10.2014
18.	Mr. Asif Gohar	07.08.1964	Mansehra	26.04.2000	26.04.2002	20.01.2011
19.	Mr. Tahir Iqbal	20.01.1969	Haripur	26.04.2000	26.04.2002	25.03.2013

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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
20.	Mr. Khabir Muhammad	01.01.1972	Abbottabad	26.04.2000	26.04.2002	12.09.2014
21.	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	26.04.2000	26.04.2002	08.04.2016
22.	Mr. Qamar Hayat	08.04.1971	Haripur	26.04.2000	26.04.2002	07.11.2012
23.	Mr. Ijaz Ahmad	05.04.1963	Mansehra	26.04.2000	26.04.2002	12.09.2014
24.	Mr. Arshad Mehmood	15.08.1964	Mansehra	26.04.2000	26.04.2002	12.09.2014
25.	Muhammad Javed	03.06.1963	Mansehra	26.04.2000	26.04.2002	27.10.2015
26.	Mr. Falak Niaz	01.04.1965	Swabi	02.05.2000	02.05.2002	07.11.2012
27.	Mr. Tajamul Khan	30.09.1965	Swabi	03.07.2000	03.07.2002	24.01.2014
28.	Mr. Tariq Habib	05.09.1968	Peshawar	20.09.2000	20.09.2002	31.03.2012
29.	Mr. Nisar Ahmad	02.11.1973	Charsadda	20.09.2000	20.09.2002	31.03.2012
30.	Mr. Tariq Iqbal	13.04.1974	Peshawar	20.09.2000	20.09.2002	31.03.2012
31.	Mr. Aslam Nawaz	01.03.1972	Bannu	20.09.2000	20.09.2002	31.03.2012
32.	Mr. Ishtiaq Ahmad	01.11.1971	Lakki	20.09.2000	20.09.2002	07.11.2012
33.	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	29.01.2001	29.01.2003	19.07.2013
34.	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	01.06.2001	01.06.2003	25.03.2013
35.	Mr. Iftikhar Shah	30.04.1966	Mardan	02.06.2001	02.06.2003	25.03.2016
36.	Mr. Noor Jamal	10.01.1966	Mardan	31.07.2001	31.07.2003	31.03.2012
37.	Syed Mukhtiar Shah	18.10.1967	Haripur	17.11.2001	17.11.2003	24.01.2014
38.	Mr. Nazir Ahmad	02.02.1970	Abbottabad	17.11.2001	17.11.2003	07.11.2012
39.	Mr. Saeed Akhtar	02.02.1971	Haripur	17.11.2001	17.11.2003	07.11.2012
40.	Mr. Niaz Gul	07.03.1971	Abbottabad	17.11.2001	17.11.2003	24.01.2014
41.	Mr. Muhammad Ishtiaq	04.05.1973	Mansehra	17.11.2001	17.11.2003	24.01.2014
42.	Mr. Muhammad Maroof	05.10.1974	Abbottabad	17.11.2001	17.11.2003	02.04.2015
43.	Mr. Muhammad Ayaz	03.03.1975	Abbottabad	17.11.2001	17.11.2003	07.11.2012
44.	Muhammad Jamil Akhtar	22.02.1977	Haripur	17.11.2001	17.11.2003	07.11.2012
45.	Mr. Abdul Hai Khan	01.08.1972	D.I.Khan	23.11.2001	23.11.2003	19.07.2013
46.	Syed Inayat Ali Shah	10.01.1972	D.I.Khan	23.11.2001	23.11.2003	24.01.2014
47.	Mr. Niaz Muhammad	11.02.1971	Swabi	29.11.2001	29.11.2003	25.03.2013
48.	Mr. Hameed Ullah	25.04.1974	Mardan	01.12.2001	01.12.2003	24.01.2014
49.	Mr. Sajjad Ahmad	01.04.1968	Swabi	01.12.2001	01.12.2003	25.03.2013
50.	Mr. Shah Hassan	01.05.1968	Mardan	01.12.2001	01.12.2003	08.04.2013
51.	Mr. Nazir Khan	18.10.1970	Mardan	01.12.2001	01.12.2003	19.07.2013
52.	Sajjad Ahmad Sahibzada	02.02.1971	Swabi	01.12.2001	01.12.2003	08.04.2013
53.	Mr. Muzamil Shah	08.03.1972	Swabi	01.12.2001	01.12.2003	25.03.2013
54.	Mr. Mushtaq Ahmad	15.03.1970	Swabi	01.12.2001	01.12.2003	25.03.2013

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules.13.18	D.O Promotion as DSP
55.	Mr. Shaukat Ali	05.03.1971	Swabi	01.12.2001	01.12.2003	30.11.2012
56.	Mr. Abdul Samad	14.04.1969	Swabi	01.12.2001	01.12.2003	25.03.2013
57.	Mr. Muhammad Khalid	01.01.1970	Chitral	01.12.2001	01.12.2003	24.01.2014
58.	Mr. Zia Hassan	01.11.1974	DIKhan	13.12.2001	13.12.2003	02.01.2014
59.	Mr. Salah-ud-Din	15.01.1970	Tank	24.01.2002	24.01.2004	07.11.2012
60.	Mr. Shafiullah	01.04.1971	DIKhan	24.01.2002	24.01.2004	07.11.2012
61.	Mr. Tauheed Khan	20.10.1963	DIKhan	25.01.2002	25.01.2004	19.03.2012
62.	Mr. Rahim Hussain	11.05.1970	Shangla	17.10.2002	17.10.2004	12.09.2014
63.	Mr. Amjad Hussain	24.03.1971	Mansehra	17.10.2002	17.10.2004	12.09.2014
64.	Mr. Murad Ali	09.01.1973	Bannu	30.09.2000	30.09.2002	02.04.2015
65.	Mr. Ali Gohar	23.03.1968	K. Agency	13.01.2003	13.01.2005	02.04.2015
66.	Mr. Habib Ur Rehman	04.03.1966	Mansehra	20.02.2003	20.02.2005	30.09.2016
67.	Mr. Nasir Khan	20.12.1972	Peshawar	20.02.2003	20.02.2005	30.01.2018
68.	Mr. Waqar Ahmad	12.04.1974	Charsadda	01.05.2003	01.05.2005	02.04.2015
69.	Mr. Abdus Salam Khalid	24.06.1976	Lakki	01.05.2003	01.05.2005	25.03.2016
70.	Mr. Sajjad Hussain	23.03.1976	Nowshera	23.06.2003	23.06.2005	02.04.2015
71.	Muhammad Tahir Shah	01.03.1972	Bannu	24.07.2003	24.07.2005	24.01.2014
72.	Mr. Safdar Khan	30.04.1971	Kohat	29.08.2003	29.08.2005	02.04.2015
73.	Mr. Hidayat Ullah Shah	20.04.1965	Swabi	20.12.2003	20.12.2005	25.03.2016
74.	Mr. Shakeel Ahmad	14.04.1969	Charsadda	20.12.2003	20.12.2005	12.09.2014
75.	Mr. Khan Khel	10.04.1969	Mardan	20.12.2003	20.12.2005	24.01.2014
76.	Mr. Muhammad Saeed	04.05.1969	Mardan	20.12.2003	20.12.2005	12.09.2014
77.	Mr. Rasheed Iqbal	15.01.1974	Mardan	20.12.2003	20.12.2005	25.03.2016
78.	Mr. Muhammad Fayaz	07.03.1974	Mardan	20.12.2003	20.12.2005	25.03.2016
79.	Ms. Aneela Naz	09.10.1971	Peshawar	01.01.2004	01.01.2006	02.04.2015
80.	Ms. Asmat Ara	15.04.1975	Swabi	01.01.2004	01.01.2006	02.04.2015
81.	Mrs. Shazia Shahid	30.04.1976	Charsadda	01.01.2004	01.01.2006	02.04.2015
82.	Mr. Mujeeb Ur Rehman	02.04.1969	Bannu	08.04.2004	08.04.2006	02.04.2015
83.	Mr. Nisar Muhammad	20.01.1973	Lakki	17.04.2004	17.04.2006	24.01.2014
84.	Mr. Rahmat Ullah	05.03.1971	Nowshera	31.05.2004	31.05.2006	24.10.2014
85.	Mr. Mustafa Kamal Pasha	01.09.1969	Bannu	07.10.2004	07.10.2006	02.04.2015
86.	Mr. Azmat Ali Khan	06.01.1970	Bannu	07.10.2004	07.10.2006	02.04.2015
87.	Mr. Shabir Hussain Shah	15.06.1972	Lakki	07.10.2004	07.10.2006	18.08.2015
88.	Arbab Shafiullah Jan	09.10.1966	Peshawar	22.11.2004	22.11.2006	02.01.2014
89.	Mr. Rafiullah	12.03.1968	Peshawar	22.11.2004	22.11.2006	02.01.2014

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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
90.	Muhammad Atiq Shah	01.09.1978	Charsadda	22.11.2004	22.11.2006	06.02.2014
91.	Mr. Yasir Aman	11.08.1970	Peshawar	22.11.2004	22.11.2006	02.04.2015
92.	Mr. Naseer Ali	03.10.1975	Charsadda	22.11.2004	22.11.2006	30.09.2016
93.	Mr. Murad Ali	13.04.1965	Charsadda	22.11.2004	22.11.2006	15.11.2016
94.	Mr. Aurang Zeb	05.01.1970	Mansehra	04.12.2004	04.12.2006	30.09.2016
95.	Mr. Sajjad Haider	20.04.1970	Abbottabad	04.12.2004	04.12.2006	15.11.2016
96.	Mr. Muhammad Ilyas	01.04.1973	Mardan	07.12.2004	07.12.2006	18.08.2015
97.	Mr. Arshad Khan	30.05.1974	Peshawar	08.12.2004	08.12.2006	07.03.2017
98.	Ms. Nazia Naureen	01.12.1970	Abbottabad	09.12.2004	09.12.2006	12.09.2014
99.	Mrs. Shahzadi Noshad	10.04.1972	Hangu	09.12.2004	09.12.2006	12.09.2014
100.	Mr. Alamzeb	12.02.1980	Mardan	23.12.2004	23.12.2006	24.10.2014
101.	Mr. Aqiq Hussain	01.04.1965	Kohat	10.01.2005	10.01.2007	18.08.2015
102.	Mr. Falak Nawaz	03.02.1969	Kohat	10.01.2005	10.01.2007	25.03.2016
103.	Mr. Mazhar Jehan	12.12.1970	Kohat	10.01.2005	10.01.2007	24.08.2020
104.	Mr. Khalid Usman	06.01.1967	Karak	10.01.2005	10.01.2007	18.08.2015
105.	Mr. Asad Zubair	15.01.1980	Kohat	10.01.2005	10.01.2007	29.11.2018
106.	Mr. Muhammad Riaz	13.08.1973	Karak	10.01.2005	10.01.2007	24.08.2020
107.	Mr. Zafar Khan	10.01.1963	Buner	16.04.2005	16.04.2007	24.10.2014
108.	Mrs. Rozia Altaf	30.07.1969	Peshawar	13.05.2005	13.05.2007	02.04.2015
109.	Ms. Hamida Bano	04.12.1970	Peshawar	13.05.2005	13.05.2007	02.04.2015
110.	Mr. Muhammad Ismail	12.01.1966	Lakki	07.06.2005	07.06.2007	25.03.2016
111.	Mr. Mehmood Nawaz	07.03.1974	Lakki	02.07.2005	02.07.2007	30.01.2018
112.	Mr. Muhammad Sattar Khan	04.04.1964	Chitral	13.07.2005	13.07.2007	25.03.2016
113.	Mr. Muhammad Zaman	01.01.1965	Buner	13.07.2005	13.07.2007	25.03.2016
114.	Mr. Riaz Muhammad	10.12.1962	Swabi	13.07.2005	13.07.2007	15.11.2016
115.	Mr. Rizwan Habib	19.04.1974	Mansehra	28.12.2005	28.12.2007	12.09.2014
116.	Mr. Jehangir Khan	10.11.1965	Abbottabad	28.12.2005	28.12.2007	24.10.2014
117.	Mr. Shah Mumtaz	20.02.1965	Dir Lower	27.05.2006	27.05.2008	30.01.2018
118.	Mr. Zahoor Ahmed	01.01.1980	Dir Lower	27.05.2006	27.05.2008	24.03.2020
119.	Mr. Zafar Ahmad	10.01.1979	Chitral	27.05.2006	27.05.2008	30.01.2018
120.	Mr. Farmanullah	27.10.1978	Dir Lower	27.05.2006	27.05.2008	30.01.2018
121.	Mr. Wahid Ullah	01.04.1981	Dir Lower	27.05.2006	27.05.2008	24.08.2020
122.	Mr. Iftikhar Ali Shah	11.05.1976	Bannu	25.08.2006	25.08.2008	15.11.2016
123.	Mr. Amir Hussain	25.05.1965	Swabi	07.11.2006	07.11.2008	30.09.2016
124.	Mr. Sher Afsar	09.02.1963	Swabi	23.11.2006	23.11.2008	29.11.2018

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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
125.	Mr. Muhammad Rauf	04.04.1963	Mardan	23.11.2006	23.11.2008	25.03.2016
126.	Mr. Rokhan Zeb	07.04.1965	Swabi	18.04.2007	18.04.2009	25.03.2016
127.	Mr. Janzada	01.04.1963	Charsadda	16.07.2007	16.07.2009	25.03.2016
128.	Mr. Zahid Khan	08.04.1967	Mkd. Agency	20.10.2007	20.10.2009	29.11.2018
129.	Mr. Badshah Hazrat	15.02.1969	Dir Lower	20.10.2007	20.10.2009	29.11.2018
130.	Mr. Naveed Iqbal	13.03.1981	Swat	20.10.2007	20.10.2009	29.11.2018
131.	Mr. Ajmal Khan	15.05.1982	Mkd: Agency	20.10.2007	20.10.2009	16.05.2019
132.	Mr. Atiq-ur-Rehman	01.11.1981	Chitral	20.10.2007	20.10.2009	24.08.2020
133.	Mr. Shahid Adnan	27.03.1973	D.I.Khan	03.11.2007	03.11.2009	30.01.2018
134.	Mr. Muhammad Saleem Tariq	01.03.1969	DIKhan	03.11.2007	03.11.2009	29.11.2018
135.	Mr. Gul Shid Khan	01.06.1980	Charsadda	04.11.2007	04.11.2009	30.01.2018
136.	Mr. Shaheen Shah Gohar	03.03.1971	Charsadda	24.11.2007	24.11.2009	07.03.2017
137.	Mr. Gohar Ali	15.11.1974	Peshawar	19.12.2007	19.12.2009	30.09.2016
138.	Mr. Riaz Khan	03.02.1975	Peshawar	19.12.2007	19.12.2009	30.09.2016
139.	Mr. Fazal Wahid	12.01.1971	Malakand	19.12.2007	19.12.2009	30.09.2016
140.	Mr. Amjid Ali	24.04.1969	Swabi	14.03.2008	14.03.2010	30.09.2016
141.	Mr. Izhar Shah	06.03.1966	Mardan	26.03.2008	26.03.2010	30.09.2016
142.	Mr. Sher Rehman	05.04.1964	Mardan	03.04.2008	03.04.2010	15.11.2016
143.	Mr. Jamil-ur-Rehman	16.04.1974	Abbottabad	07.01.2002	-	12.03.2018
144.	Mr. Muhammad Iqbal	11.02.1963	- Mansehra	08.04.2008	08.04.2010	16.05.2019
145.	Mr. Shah Nawaz	06.06.1967	Mansehra	08.04.2008	08.04.2010	24.08.2020
146.	Mr. Muhammad Khurshid	12.01.1963	Mansehra	08.04.2008	08.04.2010	07.03.2017
147.	Mr. Muhammad Altaf	12.03.1969	Haripur	08.04.2008	08.04.2010	30.09.2016
148.	Mr. Fazal Wahid	01.12.1968	Mardan	19.04.2008	19.04.2010	29.11.2018
149.	Mr. Muslim Khan	16.02.1970	Mardan	21.04.2008	21.04.2010	30.01.2018
150.	Mr. Muhammad Saddique	16.11.1968	Abbottabad	21.04.2008	21.04.2010	30.01.2018
151.	Mr. Faqir Hussain	02.02.1967	Peshawar	21.04.2008	21.04.2010	29.11.2018
152.	Mr. Naseer Khan	01.04.1963	Charsadda	21.04.2008	21.04.2010	15.11.2016
153.	Mr. Hukam Khan	14.03.1969	Charsadda	21.04.2008	21.04.2010	30.01.2018
154.	Mr. Arab Nawaz	11.02.1969	Charsadda	21.04.2008	21.04.2010	15.11.2016
155.	Mr. Mehar Ali	01.01.1969	Nowshera	21.04.2008	21.04.2010	30.01.2018
156.	Mr. Yar Nawab	05.11.1963	Mardan	21.04.2008	21.04.2010	30.01.2018
157.	Mr. Iftikhar Ali	10.02.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018
158.	Mr. Nasir Khan	22.11.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018
159.	Mr Hazrat Ullah	05.01.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018

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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
160.	Mr. Fazal Dad	16.03.1966	Charsadda	21.04.2008	21.04.2010	16.05.2019
161.	Mr. Abdullah Jan	24.10.1963	Peshawar	21.04.2008	21.04.2010	18.02.2022
162.	Mr. Liaqat Ali	08.04.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018
163.	Mr. Tayyab Jan	01.05.1970	Charsadda	21.04.2008	21.04.2010	30.01.2018
164.	Mr. Asif Mehmood	25.04.1975	Bannu	04.07.2008	04.07.2010	18.02.2022
165.	Mr. Ghulam Sadig	01.02.1968	Mkd: Agency	05.08.2008	05.08.2010	16.05.2019
166.	Mr. Roshan Zeb	16.02.1964	Mardan	26.08.2008	26.08.2010	30.01.2018
167.	Mr. Fazal Subhan	02.05.1968	Nowshera	26.08.2008	26.08.2010	30.01.2018
168.	Mr. Muhammad Ijaz Khan	01.09.1977	Charsadda	26.08.2008	26.08.2010	15.11.2016
169.	Mr. Muhammad Yaseen	30.03.1975	Charsadda	10.09.2008	10.09.2010	15.11.2016
170.	Mr. Ibrar Khan	20.05.1970	Abbottabad	19.09.2008	19.09.2010	15.11.2016
171.	Mr. Muhammad Yaseen	28.12.1973	Haripur	19.09.2008	19.09.2010	07.03.2017
172.	Mr. Iftikhar Ahmad	10.05.1968	Mansehra	19.09.2008	19.09.2010	14.03.2017
173.	Mr. Farhad Ali	16.11.1962	Mardan	19.09.2008	19.09.2010	16.05.2019
174.	Mr. Zakir Hussain	09.03.1966	Abbottabad	19.09.2008	19.09.2010	30.01.2018
175.	Mr. Azam Ali Shah	01.01.1963	Abbottabad	19.09.2008	19.09.2010	16.05.2019
176.	Mrs. Samina Zafar	25.12.1975	Haripur	19.09.2008	19.09.2010	07.03.2017
177.	Mr. Mehboob	16.12.1965	Abbottabad	19.09.2008	19.09.2010	07.03.2017
178.	Mr. Muhammad Hamayun	01.04.1963	Abbottabad	19.09.2008	19.09.2010	30.01.2018
179.	Mr. Ghulam Muhammad	01.11.1963	Mansehra	19.09.2008	19.09.2010	30.01.2018
180.	Mr. Zahoor-Ud- Din Khan	05.05.1963	D.I.Khan	03.12.2008	03.12.2010	15.11.2016
181.	Mr. Muhammad Nabi	09.10.1966	Charsadda	30.12.2008	30.12.2010	30.01.2018
182.	Mr. Ayaz Mehmood	20.02.1971	Mardan	30.12.2008	30.12.2010	30.01.2018
183.	Mr. Shakeel Ahmed	01.01.1974	Peshawar	29.01.2009	-	30.12.2019
184.	Mr. Hussain Ghulam	10.03.1970	Hangu	28.07.2009	28.07.2011	16.05.2019
185.	Mr. Muhammad Akbar	14.05.1963	Mardan	11.08.2009	11.08.2011	18.02.2022
186.	Mr. Zareef Khan	01.01.1969	Swabi	11.08.2009	11.08.2011	18.02.2022
187.	Mr. Bashir Dad	14.04.1972	Mardan	28.08.2009	28.08.2011	30.01.2018
188.	Mr. Arshad Hussain	15.05.1967	Shangla	28.08.2009	28.08.2011	16.05.2019
189.	Mr. Matloob Khan	13.04.1970	Haripur	28.08.2009	28.08.2011	24.08.2020
190.	Mr. Shah Nawaz	08.08.1965	Mansehra	28.08.2009	28.08.2011	30.09.2016
191.	Mr. Fazal Wahab	15.01.1965	Mardan	28.08.2009	28.08.2011	24.08.2020
192.	Mr. Jehanzeb Khan	30.11.1966	Abbottabad	28.08.2009	28.08.2011	24.08.2020
193.	Mr. Muhammad Amin	06.09.1962	Abbottabad	28.08.2009	28.08.2011	18.02.2022
194.	Mr. Muhammad Schail	30.04.1977	Mansehra	28.08.2009	28.08.2011	19.04.2022

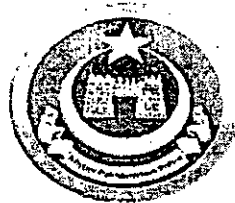
Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
195.	Mr. Muhammad Yousaf	24.08.1964	Haripur	13.10.2009	13.10.2011	24.08.2020
196.	Mr. Muhammad Sajjad	24.03.1969	Mansehra	13.10.2009	13.10.2011	24.08.2020
197.	Mr. Fida Muhammad	11.12.1964	Abbottabad	13.10.2009	13.10.2011	24.08.2020
198.	Mr. Alam Zeb	10.11.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
199.	Mr. Saeed Khan	15.04.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
200.	Mr. Muhammad Ishaq	21.12.1968	Nowshera	18.11.2009	18.11.2011	16.05.2019
201.	Mr. Pasham Gul	29.04.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
202.	Mr. Nasrullah Khan	20.04.1968	Peshawar	18.11.2009	18.11.2011	18.02.2022
203.	Mr. Janan Habib	16.05.1964	Charsadda	18.11.2009	18.11.2011	24.08.2020
204.	Mr. Amir Nawaz	20.03.1970	Charsadda	18.11.2009	18.11.2011	29.11.2018
205.	Mr. Afsar Zaman	01.09.1969	Mardan	18.11.2009	18.11.2011	29.11.2018
206.	Mr. Rajab Ali	09.02.1975	Kohat	18.11.2009	18.11.2011	24.08.2020
207.	Mr. Noor Ullah	10.05.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
208.	Mr. Mukhtiar Ahmad	03.12.1964	Charsadda	18.11.2009	18.11.2011	30.01.2018
209.	Mr. Muhammad Irfan	01.08.1970	Karak	12.07.1997	12.07.1999	16.05.2019
210.	Mr. Arshad Ahmed	06.01.1982	Nowshera	01.01.2010	01.01.2012	24.08.2020
211.	Mr. Muhammad Kamran	12.02.1981	Malakand	01.01.2010	01.01.2012	18.02.2022
212.	Mr. Sajid Mumtaz	27.12.1979	Charsadda	01.01.2010	01.01.2012	18.02.2022
213.	Mr. Fida Hussain	21.01.1983	Peshawar	01.01.2010	01.01.2012	18.02.2022
214.	Mr. Ijaz Ali	10.04.1983	Charsadda	01.01.2010	01.01.2012	18.02.2022
215.	Mr. Zaka Ullah	01.10.1965	Nowshera	01.01.2010	01.01.2012	18.02.2022
216.	Mr. Ali Khan	20.02.1968	Mkd Agency	01.01.2010	01.01.2012	24.08.2020
217.	Mr. Abdur Rashid	03.05.1968	Charsadda	01.01.2010	01.01.2012	29.11.2018
218.	Mr. Khalid Khan	02.01.1969	Nowshera	01.01.2010	01.01.2012	29.11.2018
219.	Mr. Niaz Muhammad	14.09.1973	Charsadda	01.01.2010	01.01.2012	29.11.2018
220.	Mr. Taj Muhammad Khan	13.02.1979	Nowshera	01.01.2010	01.01.2012	18.02.2022
221.	Mr. Tauheed Ullah	08.04.1982	Charsadda	01.01.2010	01.01.2012	29.11.2018
222.	Mr. Ijaz Ali	14.05.1978	Charsadda	01.01.2010	01.01.2012	18.02.2022
223.	Mr. Adnan Azam	16.06.1984	Charsadda	01.01.2010	01.01.2012	18.02.2022
224.	Mr. Zahid Alam	15.07.1987	Peshawar	01.01.2010	01.01.2012	18.02.2022
225.	Mr. Rehmatullah	07.03.1986	Peshawar	01.01.2010	01.01.2012	18.02.2022
226.	Mr. Muhammad Inam Jan	15.03.1979	Mardan	20.03.2010	20.03.2012	18.02.2022
227.	Mr. Luqman Khan	15.01.1980	Mardan	20.03.2010	20.03.2012	18.02.2022
228.	Mr. Ikhtiraz Khan	14.01.1985	Mardan	20.03.2010	20.03.2012	18.02.2022
229.	Pir Zar Badshah	25.05.1972	Mkd Agy	20.03.2010	20.03.2012	18.02.2022

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
230.	Mr. Muhammad Fazil	03.12.1978	Swabi	20.03.2010	20.03.2012	18.02.2022
231.	Mr. Imtiaz Ali	03.01.1977	Mardan	20.03.2010	20.03.2012	18.02.2022
232.	Mr. Sabir Gul	04.03.1984	Mardan	20.03.2010	20.03.2012	18.02.2022
233.	Mr. Azmat Ali	01.04.1978	Kohat	11.07.2010	11.07.2012	18.02.2022
234.	Mr. Sadat Khan	06.04.1983	Kohat	24.08.2010	24.08.2012	18.02.2022
235.	Mr. Fazal Hanif	01.01.1974	Karak	24.08.2010	24.08.2012	18.02.2022
236.	Mr. Nazar Hussain	10.01.1975	Hangu	24.08.2010	24.08.2012	18.02.2022
237.	Mr. Muhammad Yousaf	10.04.1975	Karak	24.08.2010	24.08.2012	18.02.2022
238.	Mr. Nazir Khan	02.04.1977	Kohat	24.08.2010	24.08.2012	18.02.2022
239.	Mr. Abid Khan	01.03.1979	Kohat	24.08.2010	24.08.2012	18.02.2022
240.	Mr. Umar Hayat	01.02.1984	Karak	24.08.2010	24.08.2012	18.02.2022


 (DR. ZAHID ULLAH) ^{PSP}
 AIG/Establishment
 For Inspector General of Police,
 Khyber Pakhtunkhwa,
 Peshawar

Endst: No. & date even.

Copy to all concerned



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

REVISED SENIORITY LIST OF DSsP BS-17 OF KHYBER PAHTUNKHWA POLICE

Dated: 28 / 06 /2022

No. 1355 /SE-I, The Revised Seniority List of DSsP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
1.	Mr. Qaid Kamal	01.01.1963	Charsadda	01.01.1994	01.01.1996	07.11.2012
2.	Mr. Muhammad Aleem Jan	11.04.1967	Peshawar	30.01.1996	30.01.1998	24.01.2014
3.	Mr. Aamir Shahzad	09.08.1968	Peshawar	30.01.1996	30.01.1998	30.06.2011
4.	Mr. Muhammad Arif	10.03.1969	Peshawar	30.01.1996	30.01.1998	19.03.2012
5.	Mr. Waqar Ahmad	03.01.1968	Nowshera	01.04.1997	01.04.1999	19.03.2012
6.	Mr. Muhammad Shafiq	13.01.1963	Bannu	01.10.1997	01.10.1999	19.03.2012
7.	Mr. Muhammad Arif	22.04.1964	Bannu	01.10.1997	01.10.1999	07.11.2012
8.	Mr. Gul Naseeb	09.11.1968	Bannu	01.10.1997	01.10.1999	19.03.2012
9.	Mr. Sanullah	10.01.1969	Lakki	01.10.1997	01.10.1999	31.03.2012
10.	Mr. Amir Muhammad Khan	07.01.1970	Buner	14.10.1997	14.10.1999	19.03.2012
11.	Mr. Ali Hassan	06.03.1965	K.Agency	28.01.1998	28.01.2000	24.08.2020
12.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	20.02.1998	20.02.2000	30.06.2011
13.	Mr. Munir Hussain	30.05.1966	Mansehra	15.04.1998	15.04.2000	07.11.2012
14.	Mr. Tahir ur Rahman	28.02.1969	Haripur	20.06.1998	20.06.2000	19.03.2012
15.	Mr. Muhammad Suleman	28.07.1970	Mansehra	20.06.1998	20.06.2000	30.06.2011
16.	Mr. Janas Khan	10.02.1965	Abbottabad	20.06.1998	20.06.2000	20.01.2011
17.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	26.05.1987	20.06.2000	25.03.2013
18.	Mr. Asad Mehmood	08.03.1968	Swabi	-	07.09.2000	24.10.2014
19.	Mr. Asif Gohar	07.08.1964	Mansehra	26.04.2000	26.04.2002	20.01.2011
20.	Mr. Tahir Iqbal	20.01.1969	Haripur	26.04.2000	26.04.2002	25.03.2013

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
21.	Mr. Khabir Muhammad	01.01.1972	Abbottabad	26.04.2000	26.04.2002	12.09.2014
22.	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	26.04.2000	26.04.2002	08.04.2016
23.	Mr. Qamar Hayat	08.04.1971	Haripur	26.04.2000	26.04.2002	07.11.2012
24.	Mr. Ijaz Ahmad	05.04.1963	Mansehra	26.04.2000	26.04.2002	12.09.2014
25.	Mr. Arshad Mehmood	15.08.1964	Mansehra	26.04.2000	26.04.2002	12.09.2014
26.	Muhammad Javed	03.06.1963	Mansehra	26.04.2000	26.04.2002	27.10.2015
27.	Mr. Falak Niaz	01.04.1965	Swabi	02.05.2000	02.05.2002	07.11.2012
28.	Mr. Tajamul Khan	30.09.1965	Swabi	03.07.2000	03.07.2002	24.01.2014
29.	Mr. Tariq Habib	05.09.1968	Peshawar	20.09.2000	20.09.2002	31.03.2012
30.	Mr. Nisar Ahmad	02.11.1973	Charsadda	20.09.2000	20.09.2002	31.03.2012
31.	Mr. Tariq Iqbal	13.04.1974	Peshawar	20.09.2000	20.09.2002	31.03.2012
32.	Mr. Aslam Nawaz	01.03.1972	Bannu	20.09.2000	20.09.2002	31.03.2012
33.	Mr. Ishtiaq Ahmad	01.11.1971	Lakki	20.09.2000	20.09.2002	07.11.2012
34.	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	29.01.2001	29.01.2003	19.07.2013
35.	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	01.06.2001	01.06.2003	25.03.2013
36.	Mr. Iftikhar Shah	30.04.1966	Mardan	02.06.2001	02.06.2003	25.03.2016
37.	Mr. Noor Jamal	10.01.1966	Mardan	31.07.2001	31.07.2003	31.03.2012
38.	Syed Mukhtiar Shah	18.10.1967	Haripur	17.11.2001	17.11.2003	24.01.2014
39.	Mr. Nazir Ahmad	02.02.1970	Abbottabad	17.11.2001	17.11.2003	07.11.2012
40.	Mr. Saeed Akhtar	02.02.1971	Haripur	17.11.2001	17.11.2003	07.11.2012
41.	Mr. Niaz Gul	07.03.1971	Abbottabad	17.11.2001	17.11.2003	24.01.2014
42.	Mr. Muhammad Ishtiaq	04.05.1973	Mansehra	17.11.2001	17.11.2003	24.01.2014
43.	Mr. Muhammad Maroof	05.10.1974	Abbottabad	17.11.2001	17.11.2003	02.04.2015
44.	Mr. Muhammad Ayaz	03.03.1975	Abbottabad	17.11.2001	17.11.2003	07.11.2012
45.	Muhammad Jamil Akhtar	22.02.1977	Haripur	17.11.2001	17.11.2003	07.11.2012
46.	Mr. Salah-ud-Din	15.01.1970	Tank	23.11.2001	23.11.2003	07.11.2012
47.	Mr. Tauheed Khan	20.10.1963	DIKhan	23.11.2001	23.11.2003	19.03.2012
48.	Mr. Niaz Muhammad	11.02.1971	Swabi	29.11.2001	29.11.2003	25.03.2013
49.	Mr. Hameed Ullah	25.04.1974	Mardan	01.12.2001	01.12.2003	24.01.2014
50.	Mr. Sajjad Ahmad	01.04.1968	Swabi	01.12.2001	01.12.2003	25.03.2013
51.	Mr. Shah Hassan	01.05.1968	Mardan	01.12.2001	01.12.2003	08.04.2013
52.	Mr. Nazir Khan	18.10.1970	Mardan	01.12.2001	01.12.2003	19.07.2013

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
84.	Mr. Nisar Muhammad	20.01.1973	Lakki	17.04.2004	17.04.2006	24.01.2014
85.	Mr. Rahmat Ullah	05.03.1971	Nowshera	31.05.2004	31.05.2006	24.10.2014
86.	Mr. Mustafa Kamal Pasha	01.09.1969	Bannu	07.10.2004	07.10.2006	02.04.2015
87.	Mr. Azmat Ali Khan	06.01.1970	Bannu	07.10.2004	07.10.2006	02.04.2015
88.	Mr. Shabir Hussain Shah	15.06.1972	Lakki	07.10.2004	07.10.2006	18.08.2015
89.	Arbab Shafullah Jan	09.10.1966	Peshawar	22.11.2004	22.11.2006	02.01.2014
90.	Mr. Rafiullah	12.03.1968	Peshawar	22.11.2004	22.11.2006	02.01.2014
91.	Muhammad Atiq Shah	01.09.1978	Charsadda	22.11.2004	22.11.2006	06.02.2014
92.	Mr. Yasir Aman	11.08.1970	Peshawar	22.11.2004	22.11.2006	02.04.2015
93.	Mr. Naseer Ali	03.10.1975	Charsadda	22.11.2004	22.11.2006	30.09.2016
94.	Mr. Murad Ali	13.04.1965	Charsadda	22.11.2004	22.11.2006	15.11.2016
95.	Mr. Aurang Zeb	05.01.1970	Mansehra	04.12.2004	04.12.2006	30.09.2016
96.	Mr. Sajjad Haider	20.04.1970	Abbottabad	04.12.2004	04.12.2006	15.11.2016
97.	Mr. Muhammad Ilyas	01.04.1973	Mardan	07.12.2004	07.12.2006	18.08.2015
98.	Mr. Arshad Khan	30.05.1974	Peshawar	08.12.2004	08.12.2006	07.03.2017
99.	Ms. Nazia Naureen	01.12.1970	Abbottabad	09.12.2004	09.12.2006	12.09.2014
100.	Mrs. Shahzadi Noshad	10.04.1972	Hangu	09.12.2004	09.12.2006	12.09.2014
101.	Mr. Alamzeb	12.02.1980	Mardan	23.12.2004	23.12.2006	24.10.2014
102.	Mr. Aqiq Hussain	01.04.1965	Kohat	10.01.2005	10.01.2007	18.08.2015
103.	Mr. Falak Nawaz	03.02.1969	Kohat	10.01.2005	10.01.2007	25.03.2016
104.	Mr. Mazhar Jehan	12.12.1970	Kohat	10.01.2005	10.01.2007	24.08.2020
105.	Mr. Khalid Usman	06.01.1967	Karak	10.01.2005	10.01.2007	18.08.2015
106.	Mr. Asad Zubair	15.01.1980	Kohat	10.01.2005	10.01.2007	29.11.2018
107.	Mr. Muhammad Riaz	13.08.1973	Karak	10.01.2005	10.01.2007	24.08.2020
108.	Mr. Zafar Khan	10.01.1963	Buner	16.04.2005	16.04.2007	24.10.2014
109.	Mrs. Rozia Altaf	30.07.1969	Peshawar	13.05.2005	13.05.2007	02.04.2015
110.	Ms. Hamida Bano	04.12.1970	Peshawar	13.05.2005	13.05.2007	02.04.2015
111.	Mr. Muhammad Ismail	12.01.1966	Lakki	07.06.2005	07.06.2007	25.03.2016
112.	Mr. Mehmood Nawaz	07.03.1974	Lakki	02.07.2005	02.07.2007	30.01.2018
113.	Mr. Muhammad Saifur Khan	04.04.1964	Chitral	13.07.2005	13.07.2007	25.03.2016

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
53.	Sahibzada Sajjad Ahmad	02.02.1971	Swabi	01.12.2001	01.12.2003	08.04.2013
54.	Mr. Muzamil Shah	08.03.1972	Swabi	01.12.2001	01.12.2003	25.03.2013
55.	Mr. Mushtaq Ahmad	15.03.1970	Swabi	01.12.2001	01.12.2003	25.03.2013
56.	Mr. Shaukat Ali	05.03.1971	Swabi	01.12.2001	01.12.2003	30.11.2012
57.	Mr. Abdul Samad	14.04.1969	Swabi	01.12.2001	01.12.2003	25.03.2013
58.	Mr. Muhammad Khalid	01.01.1970	Chitral	01.12.2001	01.12.2003	24.01.2014
59.	Mr. Shafiullah	01.04.1971	DIKhan	13.12.2001	13.12.2003	07.11.2012
60.	Mr. Abdul Hai Khan	01.08.1972	D.I.Khan	24.01.2002	24.01.2004	19.07.2013
61.	Syed Inayat Ali Shah	10.01.1972	D.I.Khan	24.01.2002	24.01.2004	24.01.2014
62.	Mr. Zia Hassan	01.11.1974	DIKhan	25.01.2002	24.01.2004	02.01.2014
63.	Mr. Nasir Khan	20.12.1972	Peshawar	14.10.2002	14.10.2004	30.01.2018
64.	Mr. Rahim Hussain	11.05.1970	Shangla	17.10.2002	17.10.2004	12.09.2014
65.	Mr. Amjad Hussain	24.03.1971	Mansehra	17.10.2002	17.10.2004	12.09.2014
66.	Mr. Murad Ali	09.01.1973	Bannu	30.09.2000	30.09.2002	02.04.2015
67.	Mr. Ali Gohar	23.03.1968	K. Agency	13.01.2003	13.01.2005	02.04.2015
68.	Mr. Habib Ur Rehman	04.03.1966	Mansehra	20.02.2003	20.02.2005	30.09.2016
69.	Mr. Waqar Ahmad	12.04.1974	Charsadda	01.05.2003	01.05.2005	02.04.2015
70.	Mr. Abdus Salam Khalid	24.06.1976	Lakki	01.05.2003	01.05.2005	25.03.2016
71.	Mr. Sajjad Hussain	23.03.1976	Nowshera	23.06.2003	23.06.2005	02.04.2015
72.	Muhammad Tahir Shah	01.03.1972	Bannu	24.07.2003	24.07.2005	24.01.2014
73.	Mr. Safdar Khan	30.04.1971	Kohat	29.08.2003	29.08.2005	02.04.2015
74.	Mr. Hidayat Ullah Shah	20.04.1965	Swabi	20.12.2003	20.12.2005	25.03.2016
75.	Mr. Shakeel Ahmad	14.04.1969	Charsadda	20.12.2003	20.12.2005	12.09.2014
76.	Mr. Khan Khel	10.04.1969	Mardan	20.12.2003	20.12.2005	24.01.2014
77.	Mr. Muhammad Saeed	04.05.1969	Mardan	20.12.2003	20.12.2005	12.09.2014
78.	Mr. Rasheed Iqbal	15.01.1974	Mardan	20.12.2003	20.12.2005	25.03.2016
79.	Mr. Muhammad Fayaz	07.03.1974	Mardan	20.12.2003	20.12.2005	25.03.2016
80.	Ms. Aneela Naz	09.10.1971	Peshawar	01.01.2004	01.01.2006	02.04.2015
81.	Ms. Asmat Ara	15.04.1975	Swabi	01.01.2004	01.01.2006	02.04.2015
82.	Mrs. Shazia Shahid	30.04.1976	Charsadda	01.01.2004	01.01.2006	02.04.2015
83.	Mr. Mujeeb Ur Rehman	02.04.1969	Bannu	08.04.2004	08.04.2006	02.04.2015

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
114.	Mr. Muhammad Zaman	01.01.1965	Buner	13.07.2005	13.07.2007	25.03.2016
115.	Mr. Riaz Muhammad	10.12.1962	Swabi	13.07.2005	13.07.2007	15.11.2016
✓ 116.	Mr. Rizwan Habib	19.04.1974	Mansehra	28.12.2005	28.12.2007	12.09.2014
✓ 117.	Mr. Jehangir Khan	10.11.1965	Abbotabad	28.12.2005	28.12.2007	24.10.2014
118.	Mr. Shah Mumtaz	20.02.1965	Dir Lower	27.05.2006	27.05.2008	30.01.2018
119.	Mr. Zahoor Ahmed	01.01.1980	Dir Lower	27.05.2006	27.05.2008	24.08.2020
120.	Mr. Zafar Ahmad	10.01.1979	Chitral	27.05.2006	27.05.2008	30.01.2018
121.	Mr. Farmanullah	27.10.1978	Dir Lower	27.05.2006	27.05.2008	30.01.2018
122.	Mr. Wahid Ullah	01.04.1981	Dir Lower	27.05.2006	27.05.2008	24.08.2020
123.	Mr. Iftikhar Ali Shah	11.05.1976	Bannu	25.08.2006	25.08.2008	15.11.2016
124.	Mr. Amir Hussain	25.05.1965	Swabi	07.11.2006	07.11.2008	30.09.2016
125.	Mr. Sher Afsar	09.02.1963	Swabi	23.11.2006	23.11.2008	29.11.2018
126.	Mr. Muhammad Rauf	04.04.1963	Mardan	23.11.2006	23.11.2008	25.03.2016
127.	Mr. Rokhan Zeb	07.04.1965	Swabi	18.04.2007	18.04.2009	25.03.2016
128.	Mr. Janzada	01.04.1963	Charsadda	16.07.2007	16.07.2009	25.03.2016
129.	Mr. Zahid Khan	08.04.1967	Mkd. Agency	20.10.2007	20.10.2009	29.11.2018
130.	Mr. Badshah Hazrat	15.02.1969	Dir Lower	20.10.2007	20.10.2009	29.11.2018
131.	Mr. Naveed Iqbal	13.03.1981	Swat	20.10.2007	20.10.2009	29.11.2018
132.	Mr. Ajmal Khan	15.05.1982	Mkd. Agency	20.10.2007	20.10.2009	16.05.2019
133.	Mr. Atiq-ur-Rehman	01.11.1981	Chitral	20.10.2007	20.10.2009	24.08.2020
134.	Mr. Shahid Adnan	27.03.1973	D.I.Khan	03.11.2007	03.11.2009	30.01.2018
135.	Mr. Muhammad Saleem Tariq	01.03.1969	DIKhan	03.11.2007	03.11.2009	29.11.2018
136.	Mr. Gul Shid Khan	01.06.1980	Charsadda	04.11.2007	04.11.2009	30.01.2018
137.	Mr. Shaheen Shah Gohar	03.03.1971	Charsadda	24.11.2007	24.11.2009	07.03.2017
138.	Mr. Gohar Ali	15.11.1974	Peshawar	19.12.2007	19.12.2009	30.09.2016
139.	Mr. Riaz Khan	03.02.1975	Peshawar	19.12.2007	19.12.2009	30.09.2016
140.	Mr. Fazal Wahid	12.01.1971	Malakand	19.12.2007	19.12.2009	30.09.2016
141.	Mr. Amjid Ali	24.04.1969	Swabi	14.03.2008	14.03.2010	30.09.2016
142.	Mr. Izhar Shah	06.03.1966	Mardan	26.03.2008	26.03.2010	30.09.2016
143.	Mr. Sher Rehman	05.04.1964	Mardan	03.04.2008	03.04.2010	15.11.2016

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
144.	Mr. Jamil-ur-Rehman	16.04.1974	Abbottabad	07.01.2002	-	12.03.2018
145.	Mr. Muhammad Iqrar	11.02.1963	Mansehra	08.04.2008	08.04.2010	16.05.2019
146.	Mr. Shah Nawaz	06.06.1967	Mansehra	08.04.2008	08.04.2010	24.08.2020
147.	Mr. Muhammad Khurshid	12.01.1963	Mansehra	08.04.2008	08.04.2010	07.03.2017
148.	Mr. Muhammad Altaf	12.03.1969	Haripur	08.04.2008	08.04.2010	30.09.2016
149.	Mr. Fazal Wahid	01.12.1968	Mardan	19.04.2008	19.04.2010	29.11.2018
150.	Mr. Muslim Khan	16.02.1970	Mardan	21.04.2008	21.04.2010	30.01.2018
151.	Mr. Muhammad Saddique	16.11.1968	Abbottabad	21.04.2008	21.04.2010	30.01.2018
152.	Mr. Faqir Hussain	02.02.1967	Peshawar	21.04.2008	21.04.2010	29.11.2018
153.	Mr. Naseer Khan	01.04.1963	Charsadda	21.04.2008	21.04.2010	15.11.2016
154.	Mr. Hukam Khan	14.03.1969	Charsadda	21.04.2008	21.04.2010	30.01.2018
155.	Mr. Arab Nawaz	11.02.1969	Charsadda	21.04.2008	21.04.2010	15.11.2016
156.	Mr. Mehar Ali	01.01.1969	Nowshera	21.04.2008	21.04.2010	30.01.2018
157.	Mr. Yar Nawab	05.11.1963	Mardan	21.04.2008	21.04.2010	30.01.2018
158.	Mr. Iftikhar Ali	10.02.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018
159.	Mr. Nasir Khan	22.11.1968	Charsadda	21.04.2008	21.04.2010	30.01.2018
160.	Mr. Hazrat Ullah	05.01.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018
161.	Mr. Fazal Dad	16.03.1966	Charsadda	21.04.2008	21.04.2010	16.05.2019
162.	Mr. Abdullah Jan	24.10.1963	Peshawar	21.04.2008	21.04.2010	18.02.2022
163.	Mr. Liaqat Ali	08.04.1964	Charsadda	21.04.2008	21.04.2010	30.01.2018
164.	Mr. Tayyab Jan	01.05.1970	Charsadda	21.04.2008	21.04.2010	30.01.2018
165.	Mr. Asif Mehmood	25.04.1975	Bannu	04.07.2008	04.07.2010	18.02.2022
166.	Mr. Ghulam Sadiq	01.02.1968	Mkd: Agency	05.08.2008	05.08.2010	16.05.2019
167.	Mr. Roshan Zeb	16.02.1964	Mardan	26.08.2008	26.08.2010	30.01.2018
168.	Mr. Fazal Subhan	02.05.1968	Nowshera	26.08.2008	26.08.2010	30.01.2018
169.	Mr. Muhammad Ijaz Khan	01.09.1977	Charsadda	26.08.2008	26.08.2010	15.11.2016
170.	Mr. Muhammad Yaseen	30.03.1975	Charsadda	10.09.2008	10.09.2010	15.11.2016
171.	Mr. Ibrar Khan	20.05.1970	Abbottabad	19.09.2008	19.09.2010	15.11.2016
172.	Mr. Muhammad Yaseen	28.12.1973	Haripur	19.09.2008	19.09.2010	07.03.2017
173.	Mr. Iftikhar Ahmad	10.05.1968	Mansehra	19.09.2008	19.09.2010	14.03.2017


Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
174.	Mr. Farhad Ali	16.11.1962	Mardan	19.09.2008	19.09.2010	16.05.2019
175.	Mr. Zakir Hussain	09.03.1966	Abbottabad	19.09.2008	19.09.2010	30.01.2018
176.	Mr. Azam Ali Shah	01.01.1963	Abbottabad	19.09.2008	19.09.2010	16.05.2019
177.	Mrs. Samina Zafar	25.12.1975	Haripur	19.09.2008	19.09.2010	07.03.2017
178.	Mr. Mehboob	16.12.1965	Abbottabad	19.09.2008	19.09.2010	07.03.2017
179.	Mr. Muhammad Hamayun	01.04.1963	Abbottabad	19.09.2008	19.09.2010	30.01.2018
180.	Mr. Ghulam Muhammad	01.11.1963	Mansehra	19.09.2008	19.09.2010	30.01.2018
181.	Mr. Zahoor-Ud- Din Khan	05.05.1963	D.I.Khan	03.12.2008	03.12.2010	15.11.2016
182.	Mr. Muhammad Nabi	09.10.1966	Charsadda	30.12.2008	30.12.2010	30.01.2018
183.	Mr. Ayaz Mehmood	20.02.1971	Mardan	30.12.2008	30.12.2010	30.01.2018
184.	Mr. Shakeel Ahmed	01.01.1974	Peshawar	29.01.2009	-	30.12.2019
185.	Mr. Hussain Ghulam	10.03.1970	Hangu	28.07.2009	28.07.2011	16.05.2019
186.	Mr. Muhammad Akbar	14.05.1963	Mardan	11.08.2009	11.08.2011	18.02.2022
187.	Mr. Zareef Khan	01.01.1969	Swabi	11.08.2009	11.08.2011	18.02.2022
188.	Mr. Bashir Dad	14.04.1972	Mardan	28.08.2009	28.08.2011	30.01.2018
189.	Mr. Arshad Hussain	15.05.1967	Shangla	28.08.2009	28.08.2011	16.05.2019
190.	Mr. Matloob Khan	13.04.1970	Haripur	28.08.2009	28.08.2011	24.08.2020
191.	Mr. Shah Nawaz	08.08.1965	Mansehra	28.08.2009	28.08.2011	30.09.2016
192.	Mr. Fazal Wahab	15.01.1965	Mardan	28.08.2009	28.08.2011	24.08.2020
193.	Mr. Jehanzeb Khan	30.11.1966	Abbottabad	28.08.2009	28.08.2011	24.08.2020
194.	Mr. Muhammad Amin	06.09.1962	Abbottabad	28.08.2009	28.08.2011	18.02.2022
195.	Mr. Muhammad Sohail	30.04.1977	Mansehra	28.08.2009	28.08.2011	19.04.2022
196.	Mr. Muhammad Yousaf	24.08.1964	Haripur	13.10.2009	13.10.2011	24.08.2020
197.	Mr. Muhammad Sajjad	24.03.1969	Mansehra	13.10.2009	13.10.2011	24.08.2020
198.	Mr. Fida Muhammad	11.12.1964	Abbottabad	13.10.2009	13.10.2011	24.08.2020
199.	Mr. Alam Zeb	10.11.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
200.	Mr. Saeed Khan	15.04.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
201.	Mr. Muhammad Ishaq	21.12.1968	Nowshera	18.11.2009	18.11.2011	16.05.2019
202.	Mr. Pasham Gul	29.04.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
203.	Mr. Nasrullah Khan	20.04.1968	Peshawar	18.11.2009	18.11.2011	18.02.2022

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
204.	Mr. Janan Habib	16.05.1964	Charsadda	18.11.2009	18.11.2011	24.08.2020
205.	Mr. Amir Nawaz	20.03.1970	Charsadda	18.11.2009	18.11.2011	29.11.2018
206.	Mr. Afsar Zaman	01.09.1969	Mardan	18.11.2009	18.11.2011	29.11.2018
207.	Mr. Rajab Ali	09.02.1975	Kohat	18.11.2009	18.11.2011	24.08.2020
208.	Mr. Noor Ullah	10.05.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
209.	Mr. Mukhtiar Ahmad	03.12.1964	Charsadda	18.11.2009	18.11.2011	30.01.2018
210.	Mr. Muhammad Irfan	01.08.1970	Karak	12.07.1997	12.07.1999	16.05.2019
211.	Mr. Arshad Ahmed	06.01.1982	Nowshera	01.01.2010	01.01.2012	24.08.2020
212.	Mr. Muhammad Kamran	12.02.1981	Malakand	01.01.2010	01.01.2012	18.02.2022
213.	Mr. Sajid Mumtaz	27.12.1979	Charsadda	01.01.2010	01.01.2012	18.02.2022
214.	Mr. Fida Hussain	21.01.1983	Peshawar	01.01.2010	01.01.2012	18.02.2022
215.	Mr. Ijaz Ali	10.04.1983	Charsadda	01.01.2010	01.01.2012	18.02.2022
216.	Mr. Zaka Ullah	01.10.1965	Nowshera	01.01.2010	01.01.2012	18.02.2022
217.	Mr. Ali Khan	20.02.1968	Mkd Agency	01.01.2010	01.01.2012	24.08.2020
218.	Mr. Abdur Rashid	03.05.1968	Charsadda	01.01.2010	01.01.2012	29.11.2018
219.	Mr. Khalid Khan	02.01.1969	Nowshera	01.01.2010	01.01.2012	29.11.2018
220.	Mr. Niaz Muhammad	14.09.1973	Charsadda	01.01.2010	01.01.2012	29.11.2018
221.	Mr. Tauheed Ullah	08.04.1982	Charsadda	01.01.2010	01.01.2012	29.11.2018
222.	Mr. Ijaz Ali	14.05.1978	Charsadda	01.01.2010	01.01.2012	18.02.2022
223.	Mr. Adnan Azam	16.06.1984	Charsadda	01.01.2010	01.01.2012	18.02.2022
224.	Mr. Zahid Alam	15.07.1987	Peshawar	01.01.2010	01.01.2012	18.02.2022
225.	Mr. Rehmatullah	07.03.1986	Peshawar	01.01.2010	01.01.2012	18.02.2022
226.	Mr. Taj Muhammad Khan	13.02.1979	Nowshera	01.01.2010	01.01.2012	18.02.2022
227.	Mr. Muhammad Inam Jan	15.03.1979	Mardan	20.03.2010	20.03.2012	18.02.2022
228.	Mr. Luqman Khan	15.01.1980	Mardan	20.03.2010	20.03.2012	18.02.2022
229.	Mr. Ikhtiraz Khan	14.01.1985	Mardan	20.03.2010	20.03.2012	18.02.2022
230.	Pir Zar Badshah	25.05.1972	Mkd Agy	20.03.2010	20.03.2012	18.02.2022
231.	Mr. Muhammad Fazil	03.12.1978	Swabi	20.03.2010	20.03.2012	18.02.2022
232.	Mr. Imtiaz Ali	03.01.1977	Mardan	20.03.2010	20.03.2012	18.02.2022
233.	Mr. Sabir Gul	04.03.1984	Mardan	20.03.2010	20.03.2012	18.02.2022

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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
234.	Mr. Azmat Ali	01.04.1978	Kohat	11.07.2010	11.07.2012	18.02.2022
235.	Mr. Sadat Khan	06.04.1983	Kohat	24.08.2010	24.08.2012	18.02.2022
236.	Mr. Fazal Hanif	01.01.1974	Karak	24.08.2010	24.08.2012	18.02.2022
237.	Mr. Nazar Hussain	10.01.1975	Hangu	24.08.2010	24.10.2012	18.02.2022
238.	Mr. Muhammad Yousaf	10.04.1975	Karak	24.08.2010	24.08.2012	18.02.2022
239.	Mr. Nazir Khan	02.04.1977	Kohat	24.08.2010	24.08.2012	18.02.2022
240.	Mr. Abid Khan	01.03.1979	Kohat	24.08.2010	24.08.2012	18.02.2022
241.	Mr. Umar Hayat	01.02.1984	Karak	24.08.2010	24.08.2012	18.02.2022

NOTE:- Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within 15 Days after the issuance of this list, otherwise no representation will be entertained after the specific period.


(DR. ZAHID ULLAH) ^{PSP} 9
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Endst. No. & date even.
Copy to all concerned



(D) (41)

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

No. CPO/CPB/DSB/ 252

Dated Peshawar 18 August, 2022

To:

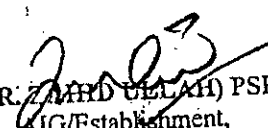
- The Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa.
- The Commandant, Elite Force, Khyber Pakhtunkhwa.
- ✓ The Addl: Inspector General of Police, HQrs: Khyber Pakhtunkhwa.
- The Addl: Inspector General of Police, Operations Khyber Pakhtunkhwa.
- The Deputy Inspector General of Police, Training Khyber Pakhtunkhwa.
- The Commandant, Police Training College, Hangu.
- The Deputy Inspector General of Police, Traffic, Khyber Pakhtunkhwa.
- The Deputy Inspector General of Police, HQrs: Khyber Pakhtunkhwa.
- The Capital City Police Officer, Peshawar.
- The Secretary to Govt. of Khyber Pakhtunkhwa Estt: Deptt Peshawar.
- The Secretary to Govt. of Khyber Pakhtunkhwa Finance: Deptt Peshawar.
- The Secretary to Govt. of Khyber Pakhtunkhwa Home & T.As Deptt Peshawar

Subject: DEPARTMENTAL SELECTION BOARD (DSB) MEETING

Memo:

The Departmental Selection Board (DSB) meeting is scheduled to be held on 19th August 2022 at 03:00 PM at Conference Room-I CPO Peshawar under the Chairmanship of Mr. Moazzam Jah Ansari, PSP(QPM, UNPM, NSWC) Provincial Police Officer, Khyber Pakhtunkhwa Peshawar, to examine the promotion cases of DSsP (BS-17) to the rank of SsP (BS-18).

2. All the members are requested to kindly attend the meeting on due date and time before the arrival of the Chairman.


(DR. FARID ULLAH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. & date even

Copy forwarded to the:

1. Assistant Inspector General of Police, Establishment Khyber Pakhtunkhwa to prepare the presentation and act as Secretary to the board.
2. PSO to Worthy Inspector General of Police, Khyber Pakhtunkhwa.
3. Director IT CPO to depute an Operator for presentation on the said date & time.
4. DSP Admin CPO Peshawar.
5. Registrar CPO Peshawar.
6. Supdt: Establishment-I, CPO Peshawar.
7. Supdt: Secret CPO Peshawar.

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MEETING OF DEPARTMENTAL SELECTION BOARD

The promotion cases of DSsP BS-17 to the rank of SsP (BS-18) will be discussed in the meeting as per following details:

- Promotion cases of (123) DSs.P will be considered from Executive and (11) from Legal Cadre to the rank of Ss.P (BS-18) as per 9:1 ratio.
- Promotion case of DSP Tele to the rank of SP.

VACANCIES FOR REGULAR PROMOTION

i)	Nomenclature of the Post	Supdt: of Police BS-18
ii)	Service/Group/Cadre	Provincial Police
iii)	Total Sanctioned Strength of BS-18 & above in Police Department Khyber Pakhtunkhwa	184
iv)	40% share of Total Strength for Provincial Cadre 184x40/100	74
v)	Available strength (8 Provl: + 21 Encl:)	29
vi)	Vacancies for Regular Promotion	45
vii)	Vacancies to be filed by promotion as per 9:1 ratio quota.	45
		Executive = 41 Legal = 04
viii)	Vacancy of Telecommunication	= 01

PROMOTION CRITERIA SUPERINTENDENT OF POLICE (BS-18)

i)	Required length of Service	05 Years as DSP
ii)	Mandatory Training	Junior Command Course
iii)	Minimum Required score/ACRs Quantification	50
iv)	No Departmental Enquiry Certificates	
v)	Medical Fitness Certificates	
vi)	Promotion Rules (KP Police promotion Rules in the rank of SP and DSP 2007)	

CONDITIONS FOR DEFERMENT

- Not completed five (05) years service as DSP.
- Not qualified Junior Command Course.
- Non-availability of ACR(s).
- Less than 50 quantification in PERs/ACRs.
- Deputation abroad.
- Under Enquiry.

CONDITIONS FOR SUPERSESSION

- Adverse ACR(s)
- Major Punishment Awarded

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2

PENEL OF DSsP TO BE DISCUSSED IN BOARD MEETINNG.

Sr. No	Name of Officers	Date of Birth	Domicile	D.O Promotion as DSP
1.	Mr. Qaid Kamal	01.01.1963	Charsadda	07.11.2012
2.	Muhammad Aleem Jan	11.04.1967	Peshawar	24.01.2014
3.	Mr. Aamir Shahzad	09.08.1968	Peshawar	30.06.2011
4.	Mr. Muhammad Arif	10.03.1969	Peshawar	19.03.2012
5.	Mr. Waqar Ahmad	03.01.1968	Nowshera	19.03.2012
6.	Mr. Muhammad Shafiq	13.01.1963	Bannu	19.03.2012
7.	Mr. Muhammad Arif	22.04.1964	Bannu	07.11.2012
8.	Mr. Gul Naseeb	09.11.1968	Bannu	19.03.2012
9.	Mr. Sanaullah	10.01.1969	Lakki	31.03.2012
10.	Mr. Amir Muhammad Khan	07.01.1970	Buner	19.03.2012
11.	Mr. Ali Hassan	06.03.1965	K. Agency	24.08.2020
12.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	30.06.2011
13.	Mr. Tahir ur Rahman	28.02.1969	Haripur	19.03.2012
14.	Mr. Muhammad Suleman	28.07.1970	Manshra	30.06.2011
15.	Mr. Janas Khan	10.02.1965	Abbottabad	20.01.2011
16.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	25.03.2013
17.	Mr. Asad Mehmood	08.03.1968	Swabi	24.10.2014
18.	Mr. Asif Gohar	07.08.1964	Manshra	20.01.2011
19.	Mr. Tahir Iqbal	20.01.1969	Haripur	25.03.2013
20.	Mr. Khahir Muhammad	01.01.1972	Abbottabad	12.09.2014
21.	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	08.04.2016
22.	Mr. Qamar Hayat	08.04.1971	Haripur	07.11.2012
23.	Mr. Ijaz Ahmad	05.04.1963	Manshra	12.09.2014
24.	Mr. Arshad Mehmood	15.08.1964	Manshra	12.09.2014
25.	Muhammad Javed	03.06.1963	Manshra	27.10.2015
26.	Mr. Falak Niaz	01.04.1965	Swabi	07.11.2012
27.	Mr. Tajamul Khan	30.09.1965	Swabi	24.01.2014
28.	Mr. Tariq Habib	05.09.1968	Peshawar	31.03.2012
29.	Mr. Nisar Ahmad	02.11.1973	Charsadda	31.03.2012
30.	Mr. Tariq Iqbal	13.04.1974	Peshawar	31.03.2012
31.	Mr. Aslam Nawaz	01.03.1972	Bannu	31.03.2012
32.	Mr. Ishtiaq Ahmad	01.11.1971	Lakki	07.11.2012
33.	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	19.07.2013
34.	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	25.03.2013
35.	Mr. Iftikhar Shah	30.04.1966	Mardan	25.03.2016
36.	Mr. Noor Jamal	10.01.1966	Mardan	31.03.2012
37.	Syed Mukhtiar Shah	18.10.1967	Haripur	24.01.2014
38.	Mr. Nazir Ahmad	02.02.1970	Abbottabad	07.11.2012
39.	Mr. Saeed Akhtar	02.02.1971	Haripur	07.11.2012
40.	Mr. Niaz Gul	07.03.1971	Abbottabad	24.01.2014
41.	Mr. Muhammad Ishtiaq	04.05.1973	Manshra	24.01.2014
42.	Mr. Muhammad Maroof	05.10.1974	Abbottabad	02.04.2015
43.	Mr. Muhammad Ayaz	03.03.1975	Abbottabad	07.11.2012
44.	Muhammad Jamil Akhtar	22.02.1977	Haripur	07.11.2012
45.	Mr. Abdul Hai Khan	01.08.1972	D.I.Khan	19.07.2013
46.	Syed Inayat Ali Shah	10.01.1972	D.I.Khan	24.01.2014
47.	Mr. Niaz Muhammad	11.02.1971	Swabi	25.03.2013
48.	Mr. Hameed Ullah	25.04.1974	Mardan	24.01.2014
49.	Mr. Sajjad Ahmad	01.04.1968	Swabi	25.03.2013
50.	Mr. Shah Hassan	01.05.1968	Mardan	08.04.2013
51.	Mr. Nazir Khan	18.10.1970	Mardan	19.07.2013
52.	Sajjad Ahmad Sahibzada	02.02.1971	Swabi	08.04.2013

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Sl. No	Name of Officers	Date of Birth	Domicile	D.O Promotion as DSP
53.	Mr. Muzamil Shah	08.03.1972	Swabi	25.03.2013
54.	Mr. Mushtaq Ahmad	15.03.1970	Swabi	25.03.2013
55.	Mr. Shaukat Ali	05.03.1971	Swabi	30.11.2012
56.	Mr. Abdul Samad	14.04.1969	Swabi	25.03.2013
57.	Mr. Muhammad Khalid	01.01.1970	Chitral	24.01.2014
58.	Mr. Zia Hussan	01.11.1974	DIKhan	02.01.2014
59.	Mr. Salah-ud-Din	15.01.1970	Tank	07.11.2012
60.	Mr. Shafiullah	01.04.1971	DIKhan	07.11.2012
61.	Mr. Tauheed Khan	20.10.1963	DIKhan	19.03.2012
62.	Mr. Rahim Hussain	11.05.1970	Shangla	12.09.2014
63.	Mr. Amjad Hussain	24.03.1971	Mansehra	12.09.2014
64.	Mr. Murad Ali	09.01.1973	Bannu	02.04.2015
65.	Mr. Ali Gohar	23.03.1968	K. Agency	02.04.2015
66.	Mr. Habib Ur Rehman	04.03.1966	Mansehra	30.09.2016
67.	Mr. Nasir Khan	20.12.1972	Peshawar	30.01.2018
68.	Mr. Waqar Ahmad	12.04.1974	Charsadda	02.04.2015
69.	Mr. Abdus Salam Khalid	24.06.1976	Lakki	25.03.2016
70.	Mr. Sajjad Hussain	23.03.1976	Nowshera	02.04.2015
71.	Muhammad Tahir Shah	01.03.1972	Bannu	24.01.2014
72.	Mr. Safdar Khan	30.04.1971	Kohat	02.04.2015
73.	Mr. Hidayat Ullah Shah	20.04.1965	Swabi	25.03.2016
74.	Mr. Shakeel Ahmad	14.04.1969	Charsadda	12.09.2014
75.	Mr. Khan Khel	10.04.1969	Mardan	24.01.2014
76.	Mr. Muhammad Saeed	04.05.1969	Mardan	12.09.2014
77.	Mr. Rasheed Iqbal	15.01.1974	Mardan	25.03.2016
78.	Mr. Muhammad Fayaz	07.03.1974	Mardan	25.03.2016
79.	Ms. Ancela Naz	09.10.1971	Peshawar	02.04.2015
80.	Ms. Asmat Ara	15.04.1975	Swabi	02.04.2015
81.	Mrs. Shazia Shahid	30.04.1976	Charsadda	02.04.2015
82.	Mr. Mujeeb Ur Rehman	02.04.1969	Bannu	02.04.2015
83.	Mr. Nisar Muhammad	20.01.1973	Lakki	24.01.2014
84.	Mr. Rahmat Ullah	05.03.1971	Nowshera	24.10.2014
85.	Mr. Mustafa Kamal Pasha	01.09.1969	Bannu	02.04.2015
86.	Mr. Azmat Ali Khan	06.01.1970	Bannu	02.04.2015
87.	Mr. Shabir Hussain Shah	15.06.1972	Lakki	18.08.2015
88.	Arbab Shafiullah Jan	09.10.1966	Peshawar	02.01.2014
89.	Mr. Rafiullah	12.03.1968	Peshawar	02.01.2014
90.	Muhammad Atiq Shah	01.09.1978	Charsadda	06.02.2014
91.	Mr. Yasir Aman	11.08.1970	Peshawar	02.04.2015
92.	Mr. Naseer Ali	03.10.1975	Charsadda	30.09.2016
93.	Mr. Murad Ali	13.04.1965	Charsadda	15.11.2016
94.	Mr. Aurang Zeb	05.01.1970	Mansehra	30.09.2016
95.	Mr. Sajjad Haider	20.04.1970	Abbottabad	15.11.2016
96.	Mr. Muhammad Ilyas	01.04.1973	Mardan	18.08.2015
97.	Mr. Arshad Khan	30.05.1974	Peshawar	07.03.2017
98.	Ms. Nazia Naureen	01.12.1970	Abbottabad	12.09.2014
99.	Mrs. Shahzadi Noshad	10.04.1972	Hangu	12.09.2014
100.	Mr. Alamzeb	12.02.1980	Mardan	24.10.2014
101.	Mr. Aqiq Hussain	01.04.1965	Kohat	18.08.2015
102.	Mr. Falak Nawaz	03.02.1969	Kohat	25.03.2016
103.	Mr. Mazhar Jehan	12.12.1970	Kohat	24.08.2020
104.	Mr. Khalid Usman	06.01.1967	Karak	18.08.2015
105.	Mr. Asad Zubair	15.01.1980	Kohat	29.11.2018
106.	Mr. Muhammad Riaz	13.08.1973	Karak	24.08.2020

Sr. No	Name of Officers	Date of Birth	Domicile	D.O Promotion as DSP
107.	Mr. Zafar Khan	10.01.1963	Buner	24.10.2014
108.	Mrs. Rozia Altaf	30.07.1969	Peshawar	02.04.2015
109.	Ms. Hamida Bano	04.12.1970	Peshawar	02.04.2015
110.	Mr. Muhammad Ismail	12.01.1966	Lakki	25.03.2016
111.	Mr. Mehmood Nawaz	07.03.1974	Lakki	30.01.2018
112.	Mr. Muhammad Sattar Khan	04.04.1964	Chitral	25.03.2016
113.	Mr. Muhammad Zaman	01.01.1965	Buner	25.03.2016
114.	Mr. Riaz Muhammad	10.12.1962	Swabi	15.11.2016
115.	Mr. Rizwan Habib	19.04.1974	Mansehra	12.09.2014
116.	Mr. Jehangir Khan	10.11.1965	Abbottabad	24.10.2014
117.	Mr. Shah Mumtaz	20.02.1965	Dir Lower	30.01.2018
118.	Mr. Zahoor Ahmed	01.01.1980	Dir Lower	24.08.2020
119.	Mr. Zafar Ahmad	10.01.1979	Chitral	30.01.2018
120.	Mr. Farmanullah	27.10.1978	Dir Lower	30.01.2018
121.	Mr. Wahid Ullah	01.04.1981	Dir Lower	24.08.2020
122.	Mr. Ifikhar Ali Shah	11.05.1976	Bannu	15.11.2016
123.	Mr. Amir Hussain	25.05.1965	Swabi	30.09.2016

DSP/Legal

Sr. No	Name of Officers	Date of Birth	Domicile	Date of Promotion as DSP
1.	Muhammad Ibrahim Azhar	17.04.1965	Kohat	07.03.2017
2.	Mr. Sohail Afzal	23.12.1964	Bannu	30.09.2016
3.	Mr. Mir Faraz	02.11.1967	Bannu	30.09.2016
4.	Mr. Muhammad Asif	31.03.1970	Lakki	30.09.2016
5.	Mr. Ibrahim Ullah Khan	20.10.1969	Kohat	30.01.2018
6.	Mr. Raza Muhammad Khan	01.01.1969	Swabi	30.01.2018
7.	Mr. Kamal Hussain	15.04.1969	Koht	24.09.2018
8.	Mr. Ishaq Gul	10.04.1968	Kohat	24.09.2018
9.	Mr. Rashid Ahmed	02.04.1980	Upper Dir	07.02.2020
10.	Mr. Wisal Ahmad	12.04.1982	Peshawar	07.02.2020
11.	Malik Habib Khan	10.01.1982	Peshawar	07.02.2020

DSP/Telecommunication

Sr. No	Name of Officers	Date of Birth	Domicile	Date of Promotion as DSP
1.	Sher Wazir	02.03.1963	Chitral	29.11.2018



(E) (46)

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT**

Dated Peshawar the September 05, 2022

NOTIFICATION

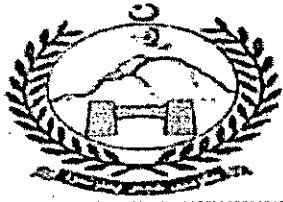
NO.SO(E-I)E&AD/2-4/2022. On the recommendations of the Departmental Selection Board, in its meeting held on 19.08.2022 and subsequent approval of the Chief Minister, Khyber Pakhtunkhwa being Competent Authority, the following Deputy Superintendents of Police (BS-17) are hereby promoted to the rank of Superintendents of Police (BS-18), on regular basis, with immediate effect :-

Sr. No	NAME OF OFFICERS	Sr. No	NAME OF OFFICERS
1.	Mr. Qaid Kamal	2.	Mr. Muhammad Aleem Jan
3.	Mr. Muhammad Arif	4.	Mr. Muhammad Shafiq
5.	Mr. Muhammad Arif	6.	Mr. Sanaullah
7.	Mr. Mukhtiar Ahmad	8.	Mr. Tahir-Ur-Rehman
9.	Mr. Muhammad Suleman	10.	Mr. Tahir Iqbal
11.	Mr. Khabir Muhammad	12.	Mr. Qamar Hayat
13.	Mr. Falak Niaz	14.	Mr. Tajamul Khan
15.	Mr. Tariq Habib	16.	Mr. Nisar Ahmad
17.	Mr. Tariq Iqbal	18.	Mr. Aslam Nawaz
19.	Mr. Ishtiaq Ahmad	20.	Mr. Ifikhar Shah
21.	Mr. Noor Jamal	22.	Syed Mukhtiar Shah
23.	Mr. Nazir Ahmad	24.	Mr. Saeed Akhtar
25.	Mr. Muhammad Ishtiaq	26.	Mr. Muhammad Maroof
27.	Mr. Muhammad Ayaz	28.	Mr. Muhammad Jamil Akhtar
29.	Mr. Abdul Hai	30.	Syed Inayat Ali Shah
31.	Mr. Niaz Muhammad	32.	Mr. Hamced Ullah
33.	Mr. Sajjad Ahmad	34.	Mr. Shah Hassan
35.	Mr. Nazir Khan	36.	Mr. Sajjad Ahmad Sahibzada
37.	Mr. Muzamil Shah	38.	Mr. Mushtaq Ahmad
39.	Mr. Shaukat Ali	40.	Mr. Abdul Samad
41.	Mr. Muhammad Khalid	42.	Mr. Zia Hassan
43.	Mr. Shafiullah	44.	Mr. Sohail Afzal
45.	Mr. Mir Faraz	46.	Mr. Muhammad Asif

2. The officers, on promotion, will remain on probation for a period of one year or till retirement, whichever is earlier, in terms of Section-6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Promotion of the officers stood at Sr. No. 33 to 43 shall be subject to the decision of the Superior Judiciary and Cabinet regarding the issue of "out of turn promotion" and absorption in Khyber Pakhtunkhwa Police from other Provinces/Departments.

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

4. Posting/transfer orders will be issued by Provincial Police Officer, Khyber Pakhtunkhwa.

CHIEF SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA

Endst. No. & date even.

Copy of above is forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Secretary to Govt. of Khyber Pakhtunkhwa, Home & TAs Department.
4. Provincial Police Officer, Khyber Pakhtunkhwa.
5. Accountant General, Khyber Pakhtunkhwa.
6. Capital City Police Officer, Khyber Pakhtunkhwa.
7. All Regional Police Officers in Khyber Pakhtunkhwa.
8. Director, Information, Khyber Pakhtunkhwa.
9. PSO to Chief Secretary, Khyber Pakhtunkhwa
10. PS to Chief Secretary, Khyber Pakhtunkhwa
11. PS to Secretary Establishment/PS to SS(E)/SS (Reg)/PA AS(HRD)/DS(E.)/SO(E.II) Establishment Department.
12. PS to Secretary (Admn.)/D.S(A)/SO(Secret)/ Director Protocol/ Estate Officer/ACSO Cypher/Deputy Director (IT) Administration Department, Khyber Pakhtunkhwa.
13. Officers concerned.
14. Manager, Govt. Printing Press Peshawar.


SECTION OFFICER (ESTT-1)

The Worthy Chief Secretary
Khyber Pakhtunkhwa, Peshawar
Through proper channel

(F)

(48)

Subject: DEPARTMENTAL APPEAL REGARDING PROMOTION
OF THE APPELLANT FROM THE RANK OF DSP (BS-17)
TO THE NEXT HIGHER RANK OF SP (BS-18)

Respected Sir,

1. That reference is made to revised seniority list issued on 28.06.2022, wherein, name of the appellant is placed at serial No. 24. Copy of revised seniority list is attached.
2. That as per SOPs and the internal correspondence of the department, the department is to promote the DSPs (BS-17) to the next rank of SP (BS-18). It is submitted that the appellant is placed at serial No. 24 of revised seniority list dated 28.06.2022, but the appellant came to know through some reliable sources that his name is not being included and considered for promotion in the working papers of promotees which is to be placed before the Departmental Selection Board.
3. That the appellant is eligible and fulfills the requisite criteria for promotion from DSP to the rank of SP as per principle of seniority cum fitness. Besides, judgment of Honourable Peshawar High Court Peshawar dated 09.12.2021 is still (Copy attached) holding the field. As per the said judgment the appellant is eligible in all respects for promotion to the next higher rank.

u. p.
D.
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HS

23/9

(P/L) 1/9
(P.L.) 5/11

Signature
01/09/22


AS (P.L.)
199
24.08.22

to be promoted to the next higher rank and no stretch of imagination disentitles the appellant to get the promotion to the next rank. (49)

5. That it is well settled principle of law that once point of law is decided by the superior courts that must be applicable to all the employees similarly placed. The Honourable Courts further elaborated and made it clear to all the departments not to force the employees to indulge in litigation.

It is therefore, very humbly prayed that on acceptance of this appeal, name of the appellant may kindly be considered for promotion from the rank of DSP (BS-17) to the next higher rank of SP (BS-18).

Dated: 22/8/2022


IJAZ AHMAD
S/o Abdul Ghaflar Khan
presently serving as
Acting Superintendent of Police
Investigation at Torghar
0343-8953716
0334-5731241.

(G) (50)

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET

Date of order.	Order or other proceedings with the order of the Judge
09.12.2021	<p><u>W.P.No.584-A of 2021 with Interim relief.</u></p> <p>Present: M/s Barrister Adnan Khan, Imtiaz Ali, Malik Muhammad Siddique Awan and Junaid Anwar Khan, advocates for the petitioners.</p> <p>M/s Shumail Ahmad Butt, Advocate General and Muhammad Sohail, AAG for the respondents.</p> <p style="text-align: center;">---</p> <p><u>LAL JAN KHATTAK, J.-</u> Through this judgment, we shall decide the connected W.P.No.587-M of 2020 titled "Badshah Hazrat & others Vs. Government of Khyber Pakhtunkhwa & others" and W.P.No.4949-P of 2020 titled "Raham Hussain & others Vs. Government of Khyber Pakhtunkhwa & others" as common question of law and fact is involved in all the three petitions wherein the petitioners have questioned the legality of decisions/orders dated 15.04.2021, 21.04.2020 and 06.10.2020 as well as minutes of the 56th Police Policy Board meeting held on 08.10.2020, whereby office of the Inspector General of Police Khyber Pakhtunkhwa has directed all the Regional Police Officers of the Province to implement the judgments of the Supreme Court of Pakistan reported in 2013 SCMR 1752, 2017 SCMR 206 and other judgments in letter and spirit pertaining to the out of turn promotions given to the police officials/officers performing their duties in the Province.</p> <p>2. In a nutshell, it is the petitioners' case that the</p>

Gain

accelerated positions held by them in the police department on no canon of law could be equated with the out of turn promotions subject matter of the judgments of the Hon'ble Supreme Court cited above and as such the impugned orders and decisions of the respondents intended to deprive them of their such positions in the Police Force are unwarranted and sans any lawful authority.

3. While presenting the petitioners' case, their learned counsel argued before the court that the fast track positions held by the petitioners in the Police Department of Khyber Pakhtunkhwa have come to them due to their hard work, getting top positions in the recruitment centers, successful teaching in the training institutions, securing "A" grade reports from their seniors in line with their duties, pursuant to the provisions of Standing Order No.11 of 1987, No.7 of 2003, relevant Police Rules, the Khyber Pakhtunkhwa Validation of Standing Order Act, 2005 (Act No.IV of 2005) and per provisions of The Khyber Pakhtunkhwa Police Act, 2017, therefore, they cannot be deprived of their such gains on the ground of giving effect to the ibid judgments of the apex court which, per learned counsel for the petitioners, were delivered in some different background and circumstances.

4 As against the above, the learned Advocate General argued that the positions earned by the petitioners are analogous to the out of turn promotions given to the police officials and officers posted in the

Gain

Police Departments of the Provinces of Sindh or Punjab which have been declared illegal and unconstitutional by the apex court in its numerous judgments with directions to the concerned Provincial Governments to re-fix their seniority positions with initial batch mates in line with the principles laid down in the judgments, therefore, per Article 89 of the Constitution of Pakistan, 1973, the impugned orders passed and decisions taken are well within the competence of the respondents in order to implement the judgments of the apex court.

5. We have heard learned counsel for the petitioners, the learned Advocate General and also gone through the available record with their valuable assistance.

6. In the elaborated judgments of the Hon'ble Supreme Court of Pakistan reported in 2013 SCMR 1752, 2017 SCMR 206 and others, no doubt the apex court has declared the out of turn promotions as illegal and unconstitutional but admittedly the issue raised and dealt with in the referred judgments pertains to the out of turn promotions of the police officials/officers of the Provinces of Sindh and Punjab which were given to the promotees in their individual capacity under Section 9-A of the Sindh Civil Servants Act, 1973 and Section 8-A of Punjab Civil Servants Act, 1974 which are reproduced hereinbelow:-

"9-A of Sindh Civil Servants Act, 1973.

Notwithstanding anything contained in this Act or any other law for the time being in force or any judgment of any Court, a civil servant who proventy exhibits, the act of gallantry while performing his duties or very exceptional

Gain

performance beyond the call of duty, may be granted out of turn promotion or award or reward in such manner as may be prescribed.

8-A of Punjab Civil Servants Act, 1974.

Notwithstanding anything contained in this Act or any other law for the time being in force or in any contract, or rights claimed or acquired under any judgment of any Court of Tribunal, a civil servant who provenly exhibits exemplary intellectual, moral and financial integrity and high standard of honesty and gives extraordinary performance in the discharge of his duties, may be granted out of turn promotion or award or reward in such manner as may be prescribed".

7. In exercise of the powers under the ibid laws, out of turn promotions were given by the relevant authorities to the police officials/officers of the two Provinces mentioned above on the basis of their individual gallantry performance and bravery through separate orders whereas the accelerated positions got by the petitioners herein are because of their getting top positions in the Training Institutions of the Province, their successfully performing instructional duties in the police recruitment centers for prescribed period, their getting "A" reports from their superiors pursuant to the Standing Order 11 of 1987, Standing Order 7 of 2003, Khyber Pakhtunkhwa Validation of Standing Order Act, 2005, rule 13.6(1) of the Police Rules, 1934 and in accordance with the provisions of the Khyber Pakhtunkhwa Police Act, 2017. For better understanding of the issue, Standing Order No.11, which was later on validated through Khyber Pakhtunkhwa Standing Order Act, 2005, is reproduced

Joins

(59)

hereinbelow:-

BACKGROUND Personnel posted as Instructors at Police Training Schools serve with extreme reluctance.

The time an officer is posted to an instructional assignment, he makes very conceivable effort, political, administrative, medical, compassionate etc. to have his posting orders cancelled.

The state of mind of such a person, who arrives at a Police Training Institution as an Instructor, can be clearly visualized. He feels that he has been discriminated against, he is disgruntled and in a pathetic frame of mind with this state of mind, those Instructors create an atmosphere of a panel institution in the Training Centre.

For many years, this Department has been cognizant of this problem. Some efforts have been made to find a solution. Various incentives have been offered to Instructors but none of them has had any impact. Posting at Police Training Centre still continues to be considered as a punishment posting.

Ideally Instructors in Training Schools would not only be willing to serve but must be amongst the finest officers in the Department. To believe this and personnel posted to Police Training Institutions as staff members, as being offered the following incentives, Instructors selected in pursuance of those incentives, will be categorized as CADET INSTRUCTORS:

INCENTIVES

1. H.C. INSTRUCTORS

Constables undergoing the Lower School Course, who pass amongst the first 5 in the Class, will be qualified to serve as H.C. Instructors provided they volunteer to serve in the Training Institute for 3 years.

Immediately at the end of 3 years, if they have earned "A" reports, they would be admitted to

John

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Intermediate School Course and their names would be placed on Promotion List 'D' as soon as they qualify the Intermediate School Course.

2. A.S.I. INSTRUCTORS.

Head Constables undergoing the Intermediate School Course, who qualify amongst the first 5 in the class, will be qualified to serve as Instructors provided they volunteer to work there for 3 years and earned category "A" reports. They would be confirmed in the rank of Assistant and Sub Inspector and their names would be brought on Promotion List 'E'.

3. S.I. INSTRUCTORS

Sub Inspectors undergoing Upper Class Course, who qualify the first 5 in the Class, will be qualified to serve as Instructors SI(s) provided they volunteer to work there for 3 years and earn category "A" reports.

At the end of that period, they would be confirmed in the rank of S.I. and their names will be brought on Promotion List 'F'.

3.A. Alternatively if volunteers are not available to the offer contained in Para 3 above, Sub-Inspectors who volunteer to serve as Instructors and are selected by the Principal, PTS, Hangu, will be offered the same incentives, i.e. after a tenure of 3 years at P.T.S. Hangu with "A" reports, they will be confirmed as Sub-Inspectors and their names brought on List 'F'.

NOTE:-

- 1 These incentives will not apply to directly recruited A.S.I(s)
- 2 These incentives can be availed of only once in a person's career.
- 3 Officers who are selected as Instructors on the basis of Promotion Examinations passed before 1984, will have to serve in the Training Institution for 2 years instead of 3 years.
- 4 The instructional tenure at PTS Hangu will be

Gain

reduced to half for those officers who have secured first five positions in the promotion examinations but have already served in the Training Institution for two years.

✓

8. Perusal of the impugned decisions/orders would show that the respondents intend to implement the judgments of the Hon'ble Supreme Court without peeping into the background and without analyzing the situations in which the out of turn promotions were given to the police personnel of the two Provinces and the accelerated positions secured by the police officials/officers performing their duties in the Province of Khyber Pakhtunkhwa. Proceeding against the petitioners by the respondents through the impugned decisions and orders by looking at the case issue superficially instead of resolving the same with deep thoughts and in a probing manner and without having a look at the history and background of both the situations will not be a fair step as they are holding the accelerated positions since long which had come to them through a merit based laid down criteria and in a structured manner and not for any braveness. It would not be out of place to mention here that since 2013, the Hon'ble Supreme Court has repeatedly declared the out of turn promotions as illegal by directing the Provincial Governments to streamline policy relating to the grant of out of turn promotions but uptill now the Government of Khyber Pakhtunkhwa has not taken any step in that direction. Whether the Provincial Government wants to withdraw the incentives given to its police personnel through the Khyber

Gain

(57)

Pakhtunkhwa Validation of Standing Order Act, 2005, Police Rules, 1934 and the Khyber Pakhtunkhwa Police Act, 2017 or it is eager to keep the same intact is a question which needs resolution in a befitting and probing manner. Indecisiveness and the lethargic conduct of the Government to the ibid effect is very lamentable which has created chaos and caused unrest in the entire Police Force of the Province which situation cannot be countenanced.

9. For what has been discussed above, we dispose of these petitions in terms that the impugned decisions/orders are set aside and the petitioners' cases are sent to the Provincial Government of Khyber Pakhtunkhwa through the Chief Secretary first to clarify its position whether it wants to continue with the matter of awarding accelerated positions to members of its Police Force in line with the Khyber Pakhtunkhwa Validation of Standing Order Act, 2005, prevailing Police Rules and Khyber Pakhtunkhwa Police Act, 2017 or not and then decide the issue raised in the petitions accordingly but till such policy is streamlined, no adverse action shall be taken against the petitioners.


JUDGE


JUDGE


JUDGE

Announced on:

24.03.2022

(H) 21 (58)

OFFICE OF FARAZ AHMED

Advocate High Court, office at Abbottabad


To

1. Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar.
2. Secretary Home and Tribal Affairs Khyber Pakhtunkhwa, Peshawar.
3. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
4. Additional IGP Establishment for Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
5. Additional IGP Headquarters for Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
6. Regional Police Officer Hazara Region, Abbottabad.

Subject: NOTICE OF FILING OF WRIT PETITION.

On the advice of my client *Ijaz Ahmed son of Abdul Ghafar Khan, Presently serving as acting Superintendent of Police Investigation at Torghar*, a writ petition is being filed before the Honourable Peshawar High Court, Abbottabad Bench. A notice/ intimation of the same is being sent to you for information/ necessary action under the law.

Dated: 21/09 /2022



(FARAZ AHMED)
Advocate High Court, Abbottabad

BEFORE THE HONORABLE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD

WRIT PETITION No. 1222-A/2022

Ijaz Ahmad..... Petitioner

VERSUS

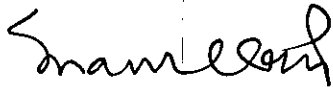
Government of Khyber Pakhtunkhwa through Chief Secretary & others..... Respondents

INDEX

S #.	Description of Documents	Annexure	Pages
1.	Comments of the respondents	----	1-3
2.	Affidavit	----	4
3.	Authority Letter	----	5

ATTACHED
19/1/23
P. SNOWKAT

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
5/28/23


(SHAKIR ULLAH)
Section Officer (Litigation-I)
Home & Tribal Affairs Department
Khyber Pakhtunkhwa

SCANNED
02 JAN 2023
Sign

BEFORE THE HONORABLE PESHAWAR HIGH COURT ABBOTTABAD
BENCH, ABBOTTABAD

Writ Petition No. 1222-A/2022.

Ijaz Ahmed..... (Petitioner)

VERSUS

Govt: of KPK through Chief Secretary etc..... (Respondents)

PARAWISE COMMENTS BY RESPONDENTS NO 1 & 2.

RESPECTIVELY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the petition is bad for non-joinder and mis-joinder of necessary parties.
- b) That the petitioner has not come to this Hon'ble Court with clean hands.
- c) That the petitioner has got no cause of action to file present petition.
- d) That the matter exclusively relates to terms and conditions of service which falls in the jurisdiction of Khyber Pakhtunkhwa, Service Tribunal.
- e) That the petition is not maintainable due to lack of jurisdiction of this Hon'ble Court under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973.

FACTS:-

1. Pertains to service record of the petitioner hence no comments.
2. Pertains to service record of the petitioner hence no comments.
3. Pertains to service record of the petitioner hence no comments.
4. Pertains to service record of the petitioner hence no comments.
5. Pertains to record needs no comments.
6. Correct to extent of convening Departmental Selection Board meeting vide letter dated 18.08.2022.
7. Correct to the extent of Notification dated 05.09.2022. Departmental Selection Board meeting was held on 19.08.2022, regarding promotion of Deputy Superintendent of Police to the rank of Superintendent of Police, however the petitioner was not considered for promotion on the issue of out of turn promotion pending in various benches of Hon'ble Peshawar High Court besides under consideration of Provincial Cabinet. The Notification dated 05.09.2022 is clear in this regard wherein the petitioner as well as other officers who fall in the ambit of out of turn promotion in light of apex Court judgments 2013 SCMR 1752 and 2015 SCMR 456 hence will be considered for promotion/ milestone after the

No. 3880
28-01-22
FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
28/12

disposal of Court cases pending in various benches of Hon'ble Peshawar High Court, Peshawar including its Principal Bench.

8. Correct to the extent of representation but the petitioner is hit by the judgments ibid hence was not considered as the issue of out of turn promotion is subjudiced in various Courts and his fate will be decided after final decision in the cases.
9. The instant writ petition is not maintainable on the following Grounds.

GROUND:-

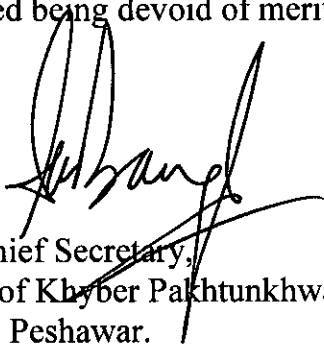
- A. Incorrect, the petitioner gained accelerated promotion which he himself admitted and the same was declared out of turn promotion by the august Supreme Court of Pakistan vide judgments reported in 2013 SCMR 1752 and 2015 SCMR 456 wherein all federating units were directed to implement the operation of judgments but unfortunately the matter still lingers due to ongoing litigation in the Hon'ble Peshawar High Court, Peshawar. While on the other hand, the Governments of Punjab, Sindh and Baluchistan implemented the judgments ibid in letter and spirit and demoted their out of turn promotees to their substantive ranks.
- B. Incorrect, the case of petitioner falls under the ambit of out of turn promotion which has already been declared un-constitutional, un-islamic, void ab initio, null and void by Apex Court in judgments ibid. Furthermore, the petitioner and other officers whose case falls under the ambit of out of turn promotion will be considered after disposal of Court cases as well as Provincial Cabinet decision, the Notification dated 05.09.2022 is in accordance with law/ rules/ facts and mandate.
- C. Incorrect, the Notification dated 05.09.2022 is quite in accordance with law/ rules and facts.
- D. Incorrect and misleading as the respondents acted in accordance with law/ rules and policy.
- E. Incorrect as the petitioner and his other out of turn promotees colleagues once again filed various Writ Petition in Hon'bl Peshawar High Court after judgment of Larger Bench wherein the matter is subjudice. Further, the department moved CPLA before apex Supreme Court of Pakistan against the decision delivered in Writ Petition No. 684-A/2021.
- F. Incorrect. The Honorable Apex Court in various reported judgments declared all those incentives of accelerated promotions as out of turn promotion and termed it unconstitutional, un-islamic, null and void ab-initio. Furthermore, CPLA against judgment dated 24.03.2022 has already been filed which is sub-judice in Apex Court hence no discrimination/ malafide have been committed by the answering respondents.

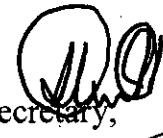
FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
128/12

- G. Incorrect and misleading as the Supreme Court of Pakistan circulated copies to all Provinces for compliance and judgments of Apex Court are always binding upon all federating units in terms of Article 189 of the Constitution of Islamic Republic of Pakistan.
- H. Incorrect, misleading and explained in preceding Paras.
- I. Incorrect, the promotion Notification issued in better interest of justice while no loss occurred to the petitioner as their cases will be dealt after decisions of various writ filed by his out of turn colleagues.
- J. That the petition is not maintainable due to lack of jurisdiction under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973.
- K. No comments.
- L. The answering respondents may be allowed to raise additional grounds at time of hearing of instant writ petition.

PRAYER:-

In view of the above, it is humbly prayed that the instant writ petition may kindly be dismissed being devoid of merits and legal force, please.


Chief Secretary,
Government of Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 1)


Secretary,
Home & TAs Department,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 2)

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
128/12

BEFORE HONORABLE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD

W.P No. 1222-A/2022

Ijaz Ahmad (Petitioners)

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary & others (Respondents)

AFFIDAVIT

I, Shakir Ullah, Section Officer (Lit-I), BPS-17 Govt. of Khyber Pakhtunkhwa, Home & Tribal Affairs Department do hereby solemnly affirm and declare that compliance report signed by the Chief Secretary Khyber Pakhtunkhwa and Secretary, Home & Tribal Affairs Department, Khyber Pakhtunkhwa is/true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'able Court.

Shakir Ullah
Deponent

16101-0986972-9
0313-2816868

Identified by

16101-0986972-9

Advocate General,
Khyber Pakhtunkhwa
Peshawar.

6805/702 Receipt No: *702*
I declare that the above was verified on Solemn
affirmation *ASD* before me on this
28th day of *December* *2022*
Shakir Ullah S/o *Shahid Ullah*
S/o *Shahid Ullah* who I know to be
Mardan who is personally known to me
Shakir Ullah (Signature)
(Signature of the Deponent)
Additional Bench

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
28/12

BEFORE HONORABLE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD

W.P No. 1222-A/2022


Ijaz Ahmad (Petitioners)

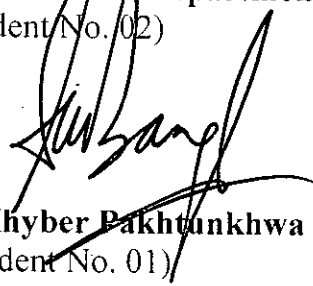
VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary & others(Respondents)

AUTHORITY LETTER

Mr. Shakir Ullah, Section Officer (Lit-I), Home & Tribal Affairs Department
Khyber Pakhtunkhwa is hereby authorized to submit parawise comment on behalf of the
undersigned in the subject case.


1. Secretary to Government of Khyber Pakhtunkhwa
Home & Tribal Affairs Department
(Respondent No. 02)


2. Chief Secretary Khyber Pakhtunkhwa
(Respondent No. 01)

**BEFORE THE HON'BLE PESHAWAR HIGH COURT, BENCH
ABBOTTABAD.**

Writ Petition No. 1222-A/2022.

Ijaz Ahmed (Petitioner).

VERSUS

Govt: of KPK, through Chief Secretary etc.....(Respondents)

INDEX.

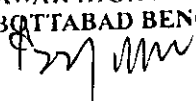
S. No.	Detail of Documents	Annexure	Page No.
1	Reply.	-	1 to 3
2	Affidavit.	-	4
3	Certificate/ receipt.	-	5 & 6
TOTAL		-	6 Pages

APPROVED
19 NOV 22
M. SHOUKAT



(AKHLAQ HUSSAIN SHAH)
Dy: Superintendent of Police,
Legal, Abbottabad.

SCANNED
23 NOV 2022
Sign _____

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH


BEFORE THE HONORABLE PESHAWAR HIGH COURT ABBOTTABAD
BENCH, ABBOTTABAD

Writ Petition No. 1222-A/2022.

Ijaz Ahmed..... (Petitioner)

VERSUS

Govt: of KPK through Chief Secretary etc..... (Respondents)

PARAWISE COMMENTS BY RESPONDENTS NO 3 TO 6.

RESPECTIVELY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the petition is bad for non-joinder and miss-joinder of necessary parties.
- b) That the petitioner has not come to this Hon'ble Court with clean hands.
- c) That the petitioner has got no cause of action to file present petition.
- d) That the matter exclusively relates to terms and conditions of service which falls in the jurisdiction of Khyber Pakhtunkhwa, Service Tribunal.
- e) That the petition is not maintainable due to lack of jurisdiction of this Hon'ble Court under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973.

FACTS:-

- 1. Pertains to service record of the petitioner hence no comments.
- 2. Pertains to service record of the petitioner hence no comments.
- 3. Pertains to service record of the petitioner hence no comments.
- 4. Pertains to service record of the petitioner hence no comments.
- 5. Pertains to record needs no comments.
- 6. Correct to extent of convening Departmental Selection Board meeting vide letter dated 18.08.2022.
- 7. Correct to the extent of Notification dated 05.09.2022. Departmental Selection Board meeting was held on 19.08.2022, regarding promotion of Deputy Superintendent of Police to the rank of Superintendent of Police however the petitioner was not considered for promotion on the issue of out of turn promotion pending in various benches of Hon'ble Peshawar High Court besides under consideration of Provincial Cabinet. The Notification dated 05.09.2022 is clear in this regard wherein the petitioner as well as other officers who fall in the ambit of

Ji
No: 3612
22-11-2022

FILED TODAY of turn promotion in light of apex Court judgments 2013 SCMR 1752 and

ADDITIONAL REGIS 2015 SCMR 456 hence will be considered for promotion/ milestone after the
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

[Signature]

disposal of Court cases pending in various benches of Hon'ble Peshawar High Court, Peshawar including its Principal Bench.

- 8. Correct to the extent of representation but the petitioner is hit by the judgments ibid hence was not considered as the issue of out of turn promotion is subjudiced in various Courts and his fate will be decided after final decision in the cases.
- 9. The instant writ petition is not maintainable on the following Grounds.

GROUND:-

- A. Incorrect, the petitioner gained accelerated promotion which he himself admitted and the same was declared out of turn promotion by the august Supreme Court of Pakistan vide judgments reported in 2013 SCMR 1752 and 2015 SCMR 456 wherein all federating units were directed to implement the operation of judgments but unfortunately the matter still lingers due to ongoing litigation in the Hon'ble Peshawar High Court, Peshawar. While on the other hand, the Governments of Punjab, Sindh and Baluchistan implemented the judgments ibid in letter and spirit and demoted their out of turn promotees to their substantive ranks.
- B. Incorrect, the case of petitioner falls under the ambit of out of turn promotion which has already been declared un-constitutional, un-Islamic, void ab-initio, null and void by Apex Court in judgments ibid. Furthermore, the petitioner and other officers whose case falls under the ambit of out of turn promotion will be considered after disposal of Court cases as well as Provincial Cabinet decision; the Notification dated 05.09.2022 is in accordance with law/ rules/ facts and mandate.
- C. Incorrect, the Notification dated 05.09.2022 is quite in accordance with law/ rules and facts.
- D. Incorrect and misleading as the respondents acted in accordance with law/ rules and policy.
- E. Incorrect as the petitioner and his other out of turn promote colleagues once again filed various Writ Petition in Hon'bl Peshawar High Court after judgment of Larger Bench wherein the matter is subjudiced. Further, the department moved CPLA before apex Supreme Court of Pakistan against the decision delivered in Writ Petition No. 684-A/2021.
- F. Incorrect. The Honorable Apex Court in various reported judgments declared all those incentives of accelerated promotions as out of turn promotion and termed it unconstitutional, un-Islamic, null and void ab-initio. Furthermore, CPLA against judgment dated 24.03.2022 has already been filed which is sub-juiced in Apex Court hence no discrimination/ malafide have been committed by the answering respondents.

Yh

FILED TODAY
 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH

- G. Incorrect and misleading as the Supreme Court of Pakistan circulated copies to all Provinces for compliance and judgments of Apex Court are always binding upon all federating units in terms of Article 189 of the Constitution of Islamic Republic of Pakistan.
- H. Incorrect, misleading and explained in preceding Paras.
- I. Incorrect, the promotion Notification issued in better interest of justice while no loss occurred to the petitioner as their cases will be dealt after decisions of various writ filed by his out of turn colleagues.
- J. That the petition is not maintainable due to lack of jurisdiction under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973.
- K. No comments.
- L. The answering respondents may be allowed to raise additional grounds at time of hearing of instant writ petition.

PRAYER:-

In view of the above, it is humbly prayed that the instant writ petition may kindly be dismissed being devoid of merits and legal force, please.

vetted by
18/10/22
Assistant Advocate General
Khyber Pakhtunkhwa Abbottabad

~~Assistant Inspector General of Police,
Establishment, Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 4)~~

IRMAN JUNE
Regional Police Officer,
Hazara Region,
Abbottabad.
(Respondent No. 6)

Amseer
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 5)

[Signature]
Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 3)

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
[Signature]

**BEFORE THE HONORABLE PESHAWAR
HIGH COURT, ABBOTTABAD BENCH.**

Writ Petition No. 1222-A/2022.


Ijaz Ahmed..... (Petitioner)

VERSUS

Govt: of KPK through Chief Secretary etc..... (Respondents)

AFFIDAVIT.

I, Akhlaq Hussain Shah, DSP Legal, Abbottabad do hereby affirm on oath that the contents of written comments are true to the best of my knowledge & belief and nothing has been concealed from the Honorable Court.



DEPONENT.

CNIC : 131503-3635253-5

Serial: 5988/529 File No: 529

Deponent that the above was a Police Officer before me on this 22 day of Nov 2022 at Abbottabad who was identified by Akhlaq Hussain Shah DSP Legal who personally knows me

Akhlaq Hussain Shah DSP Legal

Deputy Registrar
Peshawar High Court
Abbottabad Bench

22/11/22

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
(Signature)

BEFORE THE HONORABLE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH.

Writ Petition No. 1222-A/2022.

Ijaz Ahmed (Petitioner).

VERSUS

Govt: of KPK, through Chief Secretary etc.....(Respondents)

CERTIFICATE.

It is certified that the copy of comments duly prepared by the respondents in the subject writ petition has been sent to the petitioner through registered AD. Receipt whereof is enclosed herewith.



(AKHLAQ HUSSAIN SHAH)
Dy: Superintendent of Police,
Legal, Abbottabad

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

