

31st July, 2023

1. Clerk of counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney for the respondents present.

2. Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 21.11.2023 before D.B. P.P given to parties.

(Muhammad Akbar Khan) Member (E) (Rashida Bano)

`Member (J)





Appellant present in person. Muhammad Adeel Butt learned Additional Advocate General for respondents present.



Former made a request for adjournment on the ground that his counsel is not available today. Adjourned. To come up for argument on 10.03.2023 before D.B.

(Fareeha Paul) Member (E)

(Rozina Rehman) Member (J)

10-3-23

Proper Bench is incomplete, There fore case is adjurged to 11.05.23.

11.05.2023

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Khan, Deputy District Attorney for the respondents present.

P KANNERS

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 31.07.2023 before the D.B. Parcha Peshi given to the parties.

(Muhammad Akbar Khan) Member (E) (Salah-ud-Din) Member (J)

*Naeem Amin'

31.03.2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Written reply/comments on behalf of respondents not submitted. Notices be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 03.06.2022 before S.B.

(MIAN MUHAMMAD) MEMBÉR(E)

03.06.2022

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Addl. AG for respondents present.

Written reply/comments on behalf of respondents submitted, which is placed on file. A copy of the same is handed over to the counsel of appellant. To come up for rejoinder/arguments on 23.08.2022 before D.B.

(FAREEHA PAUL) Member (E) 23.08.2022

Learned counsel for the appellant present. Mr. Tariq Shah, Senior Auditor alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief of the instant appeal. Adjourned. To come up for arguments on 01.11.2022 before the D.B.

(Rozina Rehman) Member (Judicial)

(Salah-Ud-Din) Member (Judicial)

01.11.2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 21.12.2022 before the D.B.

(Mian Muhammad)

Member (E)

(Salah-Ud-Din) Member (J)

Learned counsel for the appellant at the outset of his arguments contended that the appellant is working as Junior Clerk in the respondent-department since 11.06.2009 and is aggrieved of the dated 07.11.2019 when on the order recommendations of DPC dated 16.10.2019, the appellant was promoted as Senior Clerk with immediate effect rather than 2013 when his juniors were promoted as Senior Clerks erstwhile recommendations of DPC dated 05.07.2013. Moreover, seniority list of Junior Clerks circulated on 17.06.2015 did not mention and include name of the appellant for which representations were submitted on 10.05.2017, 08.03.2018 and 04.03.2019. The appellant submitted departmental appeal on 25.08.2021 against the impugned order dated 07.11.2019 however, no appellate order was passed on his departmental appeal within the statutory period where-after he submitted the instant service appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 on 06.12.2021. Learned counsel for the appellant was confronted with the question of limitation that the appellant had submitted departmental appeal after almost two years. Learned counsel for the appellant referred to 2002 PLC (C.S) 1388 and 2021 SCMR 1230 where-under matters pertaining to promotion, pay and other emoluments or financial claims, limitation does not run in such cases.

pellant Deposited

The appeal is admitted to regular hearing subject to all just legal objections including limitaiton. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 31.03.2022 before S.B.

(Mian Muhammad) Member(E)

Form- A and a final

FORM OF ORDER SHEET

Court oi	
	•
Case No	7845 /2021
C03C 140:	

	Case No	/845/2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	~ 2	3 .
1-	06/12/2021	The appeal of Mr. Syed Wali Khan presented today by Mr. Afrasiab Khan Wazir Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
	CANNED KPST eshawag	REGISTRAR ,
2-		This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on $31/01/22$
		CHANCIAN
-		



BEFORE KHYBER PKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CHECK LIST

Case Title: Said Weli Chan vs police Dept.

S.#	Contents	Yes	No
1.	This appeal has been presented by: //frasiab loban lula 311	~	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	ンンンンンン	
3.	Whether Appeal is within time?	V	
4.	Whether the enactment under which the appeal is filed mentioned?	V	
5.	Whether the enactment under which the appeal is filed is correct?	V	
6.	Whether affidavit is appended?	V	
7.	Whether affidavit is duly attested by competent oath commissioner?	~	
8.	Whether appeal/annexures are properly paged?	レ	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	レレンノ	
10.	Whether annexures are legible?	V	
11.	Whether annexures are attested?	レ	
12.	Whether copies of annexures are readable/clear?	V	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	レ	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	V	
15.	Whether numbers of referred cases given are correct?	V	l
16.	Whether appeal contains cuttings/overwriting?	~	
, 17.	Whether list of books has been provided at the end of the appeal?		
18.	Whether case relate to this Court?	V	
19.	Whether requisite number of spare copies attached?	1/	
20.	Whether complete spare copy is filed in separate file cover?	V	
21.	Whether addresses of parties given are complete?	~	
22.	Whether index filed?	ンソソ	
23.	Whether index is correct?	V	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		,

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

Horasiab Chan Wazir

Signature:

Dated:

Myasia b

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

APPEAL NO. 7845 /2021

SAID WALI KHAN

VS

POLICE DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of Appeal		· 1- 4
2	Affidavit		5
3	Appointment order dated 11.06.2009	Α .	6-7
4	Notification dated 12.06.2009	В	8-9
5	Notification No.17477 in year 2013	С	10-13
6	Seniority List	D	14-15
. 7	Letter dated 10.05.2017 & Representations, letters dated 4.03.2019 & 08.03.2018	E	16-21
8	Impugned order dated 07.11.2019 & transfer order dated 26.12.2019	, F ,	22-32
. 9	Notification dated 06.08.2020	, G	33-34
10	Application and letter dated 29.09.2020 & letter 10.11.2020	Н	35-37
11	Departmental Appeal	I	38-39
12	Vakalat nama	•••••	40

APPELLANT

THROUGH:

AFRASVAD KHAN WAZIR ADVOCATE HIGH COURT CELL NO.03129888752

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL **PESHAWAR**

Mr. Said Wali Khan, Senior Clerk (BPS-14), Audit Cell Central Police Office, Peshawar.....

....APPELLANT.

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Assistant Inspector General Establishment, for Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 3- The Registrar, Central Police Office, Peshawar.
- 4- The Deputy Director, Audit, Central Police Office, Peshawar.
- 5- The Accountant General Khyber Pakhtunkhwa, Peshawar.

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER DATED 07.11,2019 WHEREBY THE APPELLANT HAS BEEN GRNATED PROMOTION TO THE POST OF SENIOR CLERK (BPS-14) WITH IMMEDIATE EFFECT NOT w.e.f 2013 WHEREIN COLLEAGUES & JUNIORS TO THE APPELLANT WERE PROMOMTED TO THE POST OF SENIOR CLERKS (BPS-14) IGNORED APPELLANT UNLAWFULLY AND UNJUSTFIABLY AND THE AGAINST NOT TAKING ACTION DEPARTMENTAL APPEAL OF THE APPELLANT STATUTORY PERIOD OF NINTY DAYS.

PRAYER:

6/12/2021

That on acceptance of this appeal the impugned order dated 07.11.2019 may very kindly be modified/rectified to the extent of appellant by directing the respondents to promote the appellant to the post of Senior Clerk (BPS-14) w.e.f 2013 whereby colleagues & juniors to the appellant were $\frac{1}{24 \, \mathrm{T}^{\prime}}$ promoted to the post of Senior Clerk (BPS-14) with all back benefits including seniority. Any other remedy which this August Tribunal deems fit that may also be granted in favor of the appellant.

R/SHEWETH: ON FACTS:

Brief facts raising the present appeal are as under:-

- 3- That the appellant after couple of years performing his duties entirely to the satisfaction of his superiors was expected to be promoted to the post Senior Clerk but woefully promotion Notification No.17477 in year 2013 was issued by the respondents in which colleagues & juniors to the appellant were promoted to the post of Senior Clerk (BPS-14) and ignored appellant without any cogent justification. Copy of the Notification No.17477 in year 2013 is attached as annexure..C.

- 7- That the respondent department again stamped on the due right of the appellant and issued notification dated 06.08.2020 whereby all those who were appointed on different dates merged their seniority in the name of merit, age, and qualification and considered their appointment from i.e 11.06.2009 to hide their illegalities and inefficiency. Copy of the notification dated 06.08.2020 is attached as

- 10-That the appellant further feeling aggrieved and having no other remedy but to file this appeal on the following grounds inter alia.

ON GROUNDS:

- A- That the issuance of impugned order dated 07.11.2019 by the respondents is against law, facts and norms of natural justice, hence not tenable in the eye of law and the impugned order dated 07.11.2019 be modified/rectified and granted promotion to the post of Senior clerk w.e.f notification No.17477 of 2013 whereby his colleagues & juniors were promoted to the post of Senior Clerk.
- B- That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and thus respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That action of the respondents is discriminatory in nature and thus granting promotion to the appellant to the post of Senior Clerk (BPS-14) with immediate effect not w.e.f 2013 is against norms of natural justice.
- D-That the action and inaction of the respondent is in arbitrary and malafide manner by not granting promotion to the appellant w.e.f

2013 whereby his colleagues & juniors were promoted to the post of Senior Clerk (BPS-14) and left the appellant deliberately and later on merging the seniority of the juniors and appellant vides dated 06.08.2020 to hide their illegalities and inefficiency in the name of merit.

- E- That the action of the respondent is against Section-8, 9 of the Civil Servant Act 1973 and Appointment, promotion and transfer Rules 1989) Rule, 7 & 17 thus impugned order dated 07.11.2019 may be modified/rectified to the extent of appellant and be granted promotion to the post of Senior Clerk (BPS-14) w.e.f 2013.
- F- That the action of the respondents caused financial loss to the appellant which is against Article 38(e) of the Constitution of the Islamic Republic of Pakistan 1973.
- G-That the appellant seeks permission to advance any other proof & ground at the time of regular hearing.

It is therefore most humbly prayed that the appeal of the appellant may very kindly be accepted as prayed for.

Dated: 06.12.2021

ΔΡΡΕΙΙΔΝΤ

SAID WALI KHAN

THROUGH:

AFRASIAB KHAN WAZIR

ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

A	PF	PEAL	NO.	/2021

SAID WALI KHAN

V/S

POLICE DEPTT:

<u>AFFIDAVIT</u>

I, Afrasiab Khan Wazir, Advocate High Court, Peshawar on the instructions and on behalf of my client, do hereby solemnly and affirmed that the contents of this Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

AFRASTAB KHAN WAZIR ADVOCATE

Certificate:

It is certified that no earlier appeal has been filed between the parties.

AFRAS**TAB** KHAN WAZIR ADVOCATE

A-8

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

NOTIFICATION

Dated: 11 /6 /2009.

No. 1453/ /E-III, APPOINTMENT / POSTING: Having been approved by the Departmental Selection Committee the following candidates are hereby appointed as Junior Clerks BPS 07 (3530-190-8850) purely on temporary basis in the NWFP, Police with effect from the date they actually reports for duty to his place of posting subject to medical titness and verification of character and antecedents etc.

On appointment they are posted to their respective /Districts.

The condition of their services will be as under:-

- 1. Their services are liable to be terminated within 14 days notice without assigning any reason.
- 2. They will neither be confirmed as Junior Clerk nor considered for further promotion until and unless they passes type test/departmental training etc, during the period of their services as Junior Clerk failing which his services will be dispensed with.

S/NO	NAME, FATHER'S NAME & ADDRESS	
		PLACE OF POSTING
1.	Saddique Ali s/o Fareed Khan r/o Fazal Kili. P/O Manga PS Saddar, Mardan	DPO Mardan
2.	Muhammad Nawaz Khan s/o Asmat Khan r/o Akbar Abad, Mardan.	DPO Mardan
3.	Faisal Khan s/o Jihar Khan Mardan	DPO Mardan
4.	Atta-ur- Rehman s/o Fazle Rehman r/u Mardan	DPO Mardan
5.	Hilal s/o Mir Ahmed r/o Mardan	
6.	Syed Atiq-ur-Rehman s/o Sahbzada Habib-ur-Rehman r/o Pesitawar	DPO Mardan
7.	Javed John IV.	. CCP/Peshawar
	Jawad Iqbal Khan s/o Javed Ali Khaki r/o Nayab Hous No 214/L, St. No. 03 Phase-III, Hayatabad Peshawar	
8.	Mufti Sheraz Ahmed s/o Mufti Jan Gul r/o Lahori Gate, Moh: Islamabad Peshawar	CCP/Peshawar
9.	Haji Gul s/o Munaf Gul r/o Oin Bahar Rajar Charsadda	DPO/Charsadda
10.	Muhammad Kamran Khan s/o Abdul Qayyanı r/o Ocha Valla PO & Tehsill Shabqadar Charsadda	DPO/Charsadda
11.	Sajjad Ahmed s/o Tila Muhammad r/o Shabqadar Charsadda	DPO/Charsadda
12,	Mushtaq Muhammad s/o Sultan Muhammad r/o Battagram Charsadda	DPO/Charsadda
13.	Numan Zeb s/o Aurangzeb, Nowshera	DPO/Nowshera
14.	Mian Muhammad Umer s/o Mian Fariq Ahmed, Baghcha Dehri, Sheik Maltoon Mardan	DPO/Mardan
15.	Haroon s/o Laf Badshah r/o Cener Jamal Ghari, Mardan	DPO/Mardan
	lnayat Ullah s/o Zafar Ullah r/o Banno	
	Qismat Ali s/o Nawab Ali 170 Bannu	DPO/Bannu
	Abdul Baqi Jan Khan s/o Sakbi Jan r/o Lakki Marwat	DPO/Bannu
19.	Imran Illah da Calat	DPO/Lakki
	Imran Ullah s/o Gul Marjan r/o Lakki Marwat	DPO/Lakki

A A

·	The second secon	DP
20.	Aftab Alam s/o Gul Alam r/o Lakki Marwal	
(21)	Ihsanullah s/o Gul Adeem r/o Lakki Marwat	DP
22. i	Muhammad Jamat s/o Muhammad Nawaz Khan r/o Toru Mayar Mardan	มีที่ โ
23.	Syed Wali Khan s/o Misal Khan r/o Akbar Pura	'DPO/
(24)	Shahzad s/o Daulat Khan r/o Khot City	DP
25.	Rehman Ullah s/o Muhammad Noor r/o Lakki Marwat	DP
26.	Raheem s/o Muhammad Nazir r/o Degai Nowshera	DPO
27.	Qasim Ali Zeeshan s/o Mubarak Khan r/o Nowshera	DPO
28.	Muhammad Numan s/o Haji Shah Khan r/o Bannu	DP
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(MUHAMMAD SULAMAN KHAN

DIG/ Headquarters.
For Provincial Police Officer.
NWFP, Peshawar

No. 14532-44

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

- Addl: Inspector General of Police Investigation NWFP, Peshawar alongs
 2 spare copies for publication in the NWFP, Gazette Part-II.
- 2. Capital City Police Officer Peshawar.
- 3. Deputy inspector General of Police Mardan Region.
- 4. Deputy Inspector General of Police Kohat Region.
- 5. Deputy Inspector General of Police Bannu Region.
- 6. District Police Officers, Mardan, Nowshera & Charsadda, Lakki, Bannu & Kohar
- Office Supdt: Secret CPO.
- 8. All concerned from S/No. 1 to 28.

(MUHAMMAD SULAMAN KHAN

DIG/ Headquarters. For Provincial Police Officer, SIWFP, Peshawar Beller copy - A-6

FOR PUBLICATION IN THE NWFP POLICE GAZETTE PART-11 ORDERS BY THE PROVINCIAL POLICE OFFICER NWFP

NOTIFICATION

Dated 11.06.2009

No.1453/E-111, APPOINTMENT/POSTING: Having been approved by the department selection committee the following candidates are hereby appointed as Junior Clerk BPS-07 (3530-190-8850) purely on temporary basis in the NWFP, Police with effect from the date they actually reports for duty to his place of posting subject to medical fitness and verification of character and antecedents etc.

On appointment they are posted to their respective/District.

The condition of their services will be as under:-

- 1- Their services are liable to be terminated within 14 days notice without assigning any reason.
- 2- They will neither be confirmed as junior clerk nor considered for passes and unless they promotion until further test/departmental training etc, during the period of their services as junior clerk which his services will be dispensed with.

S/No	Name, Father's Name & address	Place of posting
1	Saddique ali s/o Fareed Khan r/o fazal kili P/O	DPO Mardan
	manga PS Saddar, Mardan.	
2	Muhammad Nawaz Khan s/o Asmat Khan r/o	DPO Mardan
ľ	Akbar Abad, Mardan.	
23		DPO Nowshera

MUHAMMAD SULAMAN KHAN DIG/headquarters, For Provincial Police Officer, NWFP, Peshawar.

No.14532-44/E-111

WA

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

NOTIFICATION

Dated: 12-16 /2009

No. [46-2] /E-III. APPOINTMENT / POSTING: Having been approved by the Departmental Selection Committee the following candidates are hereby appointed as Junior Clerks BPS 07 (3530-190-8850) purely on temporary basis in the NWFP. Police with effect from the date they actually reports for duty to their place of posting subject to medical fitness and verification of character and antecedents etc.

On appointment they are posted to various Region Districts/Units.

The condition of their services will be as undert-

- 1.4 Their services are liable to be terminated within 14 days notice without assigning any reason.
- 2. They will neither be confirmed as Junior Clerk nor considered for further promotion until and unless they passes type test/departmental training etc. during the period of their services as Junior Clerk failing which his services will be dispensed with.

The state of the s	•
S/NO NAME, FATHER'S NAME & DOMICILE Mohammad Zahir Khan s/o Haji Gul Peshawar	PLACE OF POSTING
2. Muhammad Jabir Ahmad s/o Ali Ahmad Peshawar	CCP/Peshawar ,
Anna-in all the same of the sa	CCP/Peshawar &
3. Shah Jehan s/o Muzafar Khan Peshawar	CCP/Peshawar
Faqir Muhammad s/o Shahzad Gul Peshawar	CCP/Peshawar
5. Amjad Bilal s/o Habibullah Peshawar 🗸	CCP/Peshawar
6. Angad Ali s/o Rahmat Mir Peshawar	CCP/Peshawar
7 Amir Nascer s/o Nascer Jan Senior Clerk (Police Son) Peshawar	CCP/Peshawar
Muhammad Bilal s/o lady Constable LHC Nahid Begum Peshawar Abdullah s/o Flayatullah Charsadda	CPO Peshawar.
	Elite Force
10 X 11 Il	Investigation HQRs
11 Sareer Ahmad s/o Saadullah Khan Ex Office Supdt: (Police Son) Charsadda	Investigation HQrs
12. Shaheen Shah s/o Duran Shah Assistani Grade Clerk (Police Son) Nowshera	Elite Force
13 Muhammad Qasim Alzeeshan s/o Muqarab Khan Nowshera	investigation HQrs
Malik Aman Khan s/o Shamsul Qamar (Police Son) Nowshera	Investigation HQrs 7
155 Saif ud Din s/o Qamar ud Din Kohat	DPO/Kohat
In Jehanzeb s/o Aurangzeb Kohat	DPO/Kohat
Farman Ali s/o Feroz Khan Shangla	DPO/Shangla
Muhammad Nawaz s/o Muhammad Zada Dir Upper	DPO/Dir Upper
19.4 Babar Khan s/o Shah Wazir Khan Dir Upper	DPO/Dir Upper
20. Mithammad Tahir s/o Noor Hamad Dir Upper	Investigation Dir Upper
21 X Sheraz Ahmed s/o Bashir Ahmed Mardan	DPO/Mardan
Suliman Khan s/o Usmani Gul (Police Son) Mardan	DPO/Mardan
23.x Waheed Shah s/o Naeem Shah Mardan	DPO/Swabi
Roohulamin s/o Muhammad Amin Mardan	DPO/Swabi
25. Shah Jehan s/o Saeedallah Mardan	DPO/Swabi
26. Said Ali s/o Suliman Mardan	DPO/Swabi
27. Rashid Khan s/o Mian ud Din Mardan	DPO/Swabi
28. Tariq Munir s/o Akhtar Munir Mardan	Investigation Mardan
291 Mudasar Khan s/o Munawar Khan Abbottabad	DPO/Abbottabad
Amir Shafiq s/o Shafiq Ahmed (Police Son) Abbottabad	DPO/Abbottabad
Wajid Mehmood s/o Muhammad Sadique Abbuttabad	,
32. Khuram Hussain s/o Mir Hussain Abboitabad	DPO/Abbottabad
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	34	dam-ul-Hassan s/o Sacea-ur-Rehman Manschra	171 Crivianscina
1	31	Gurshid s/o Abdur Rasheed Manschra	DPO/Mausehri3
	7.	±9	- DPO/Mansehra
	36		DPO/Batagram
		Asad Ullah s/o Jehanzeb Batagram	DPO/Batagram
		Muhammad Tariq s/o Ghulam Qasim DJKhan	DPO/DIKhan
	39 2	Mehran Khan s/o Naimatullah, (Police Son) DIKhan	DPO/DiKhan
	10/3	Muhammad Noman s/o Noor Muhammad DIKhan	DPO/DIKhan
	11,	Muhammad Ismail s/o Muhammad Jalil DIKhan	
		Muhammad Tarvir Alam s/o Mir Alam DIKhan	DPO/DIKhan
;	13.	Michar Nawaz Baloch s/o Allah Nawaz Baloch (Police Son) DIM: an	DPO/DIKhan
	44.	Mulii bluscair (2) Michaganal A. J. Sancia (Police Son) Dl. Can	DPO/DIKhan
	1500	Nadir Hussair, so Muhammad Aslam (Police Son) DIKhan	DPO/DIKhan
	X	Muhammad F., 200 (disable) s/o Muhammad Fayaz DIKhan	DPO/DIKhan .
		Saadat Khaa . : Muhammad Yousaf Tank	DPO/Tank
	170	Farmanullah Khan s/o Hamcedullah Khan Bararu	DPO/Bannu
	48.	Syed Tasawer Hussain Shah s/o Syed Chand Shah Bannu	DPO/Bannu
Į	49/	Kifayatullah s/o Shah Sawar Khan Bannu	DPO/Bannu
l		Babar Saeed s/o Sharifullah Khan Lakki	Region Office Bannu
	511	Altab Alam Khan s/o Gul Alam Khan Lukki	di = === : '
Ţ	52.7	Muhammad Shoaib s/o Muhammad Sajfullah (Police Son) Lakki	Region Office Bannu
Ī	53.5	Jalal ud Din s/o Mir Kagir Khan (Police Son) Lukki	Operations Room CPO
ľ	54.X	Irinaullah s/o Haji Ghulam Muhammad Lakki	Investigation Lakki
ŀ		Swed Mehar Ali Shah s/o Mehammad Akbar Shah, Assistant Grade Clerk (E-1) CPO Nowshera	Investigation Lakki .
-	56.3/	Far and Stab etc Farmer III 1	Investigation Nowshera
L	57.	Far oog Stah s/o Fannanullah, Assistant Grede Clerk (E-II) Nowshera	Investigation Charsadda
	*	Syed Muhammad Tahir Shah s/o Syed Muhammad Zahir Shah, Assistant Orade Clerk Secret Branch CPO Nowshera	Elfte Force CPO
_		- The state of mich CrO Nowshern	3.0

(MULAMMAD SULAMAN KHAN) DIG/Headquarters,

For Provincial Police Officer. NWFP, Peshawar.

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Copy of above is forwarded for formation and necessary action to the:ppy of above is forwarded for formation and necessary action to the: 12 6 - 2009

1. Addl: Inspector General of Police Investigation NWFP, Peshawar alongwith 2 spare copies for conditioning its the NIMED. Consider the control of the NIMED. publication in the NWFP. Gazette Part-II.

2. Capital City Police Officer Peshawar.

3. Deputy Inspector of Police Mardan Region Mardan.

- 4. Deputy Inspector of Police Malakand Region Malakand.
- 5. Deputy Inspector of Police Kohat Region.
- 6. Deputy Inspector of Police Hazara Region.
- 7. Deputy Inspector of Police Bannu Region.
- 8. Deputy Inspector of Police DIKhan, Region
- 9. Gunmandant Effic Force NWFP, Peshawar.
- 10. District Police Officers, Nowshera, Charsadda, Kohat, Dir Upper, Dir Lower, Shangla, Swabi, Abbonabad, Mansehra, Batagram, DIKhan, Tank, Bannu 11. SP/Investigation Dir Upper, Lakki, Wowskay?
- 12. Incharge Operations Room CPO
- 13. Office Supdi: Scorer CPO.
- 14. Office Supdi; Elite Force
- 15. Accountant CPO.
- 16. Accountant Elite Force.
- 17. All Concerned From S/No. 1 to 57.

Beller Copy

B-8

FOR PUBLICATION IN THE NWFP POLICE GAZETTE PART-11 ORDERS BY THE PROVINCIAL, POLICE OFFICER NWFP

NOTIFICATION

Dated 12.06.2009

No.14667/E-111 APPOINTMENT/POSTING: Having been approved by the departmental selection committee the following candidates are hereby appointed as Junior Clerk 07 (3530-190-8850) purely on temporary basis in the NWFP, Police with effect from the date they actually reports for duty to his place of posting subject to medical fitness and verification of character and antecedents etc;

On appointment they are posted to their respective/District.

The condition of their services will be as under:-

- 1- Their services are liable to be terminated within 14 days notice without assigning any reason.
- 2- They will neither be confirmed as junior clerk nor considered for further promotion until and unless they passes type test/departmental training etc, during the period of their services as junior clerk which his services will be dispensed with.

S/No	Name, Father's name & Domicile	Place of posting
$\frac{3\pi \cdot 3}{1}$	Muhammd zahir Khan s/o Haji Gul Peshawar	CCP/Peshawar
2	Muhammad Jabir Ahmad s/o ali ahmad	CCP/Peshawar
_	Peshawar	
3	Shah Jehan s/o Muzafar Khan Peshawar	CCP/Peshawar
4	Faqir Muhammad s/o shahzad Gul peshawar	CCP/Peshawar
5	Amjad bilal s/o Habibullah Peshawar	CCP/Peshawar
6	Amjad ali s/o rahmat mir, peshawar	CCP/Peshawar
7	Amir Naseer s/o Naseer jan Senior Clerk(Police	CCP/Peshawar
•	Son) Peshawar	
8	Muhammad Bilal s/o lady constable LHC Nahid	CPO Peshawar
Ü	Begum Peshawar	
9	Abdullah s/o Hayataullah Charsadda	Elite Force
10	Iftikhar Ahmad s/o Nisar Muhammad Charsadda	Investigation
		HQrs
11	Sareer ahmad s/o saadullah khan Ex office	Investigation
	supdt: (Police son) charsadda	I HOR
12	Shaheen Shah s/o duran shah assistant grade	Elite force
	clerk (police son) Nowshera	A. J. Way. Mg.
13	Muhammad qasim alzeeshan s/o muqarab khan	Investigation
	nowshera	HQrs
14	Malik Aman khan s/o shamsul qamar (police	Investigation **
} - '	son) nowshera	HQrs
15	Saif ud din s/o qamar ud din kohat	DPO/Kohat
16	Jehanzeb s/o Aurangzeb kohat	DPO/Kohat
17	Farman ali s/o feroz khan shangla	DPO Shangla

)		
18	Muhammad Nawaz s/o Muhammad zada dir upper	DPO dir upper
19	Babar khan s/o shah wazir khan dir upper	DPO dir upper
20	Muhammad Tahir s/o noor hamad dir upper	Investigation dir upper
21	Sheraz ahmad s/o bashir ahmad mardan	DPO mardan
22	Suliman khan s/o usmani gul (police son) mardan	DPO mardan
23	Waheed shah s/o naeem shah mardan	DPO Swabi
24	Roohulamin s/o Muhammad amin mardan	DPO swabi
25	Shah jehan s/o saeedullah mardan	DPO swabi
26	Said ali s/o suliman mardan	DPO swabi
<u>20 </u>	Rashid khan s/o mian ud din mardan	DPO swabi
28	Tariq munir s/o akhtar munir mardan	Investigation
20	Tally Marin 3/0 aktion marin maradi	mardan
20	Mudasar khan s/o munawar khan abbottabad	DPO abbottabad
29 30	Amir shafiq s/o shafiq ahmed police son abbottabad	DPO abbottabad
31	Wajid mehmood s/o Muhammad sadique abbottabad	DPO abbottabad
32	Khuram hussain s/o mir hussain abbottabad	DPO abbottabad
	Inam ul Hassan s/o saeed ur rehman mansehra	DPO mansehra
34	khurshid s/o abdur rasheed mansehra	DPO mansehra
35	Khurshid 5/0 abdul Tasheed mansenia	DPO batagram
36	Khan Nawaz s/o atta Muhammad batagram	DPO batagram
37	Asad ullah s/o jehanzeb batagram	DPO dikhan
38	Muhammad tariq s/o ghulam qasim Dikhan	
39	Mehran Khan s/o Naimatullah (police son) dikhan	
40	Muhammad noman s/o noor Muhammad Dikhan	DPO Dikhan
41	Muhammad ismail s/o Muhammad jalil Dikhan	DPO Dikhan
42	Muhammad tanvir alam s/o mir alam Dikhan	DPO Dikhan
43	Mehar Nawaz baloch s/o Allah Nawaz Baloch (Police Son) Dikhan	
44	Nadir hussain s/o Muhammad aslam (police son) Dikhan	DPO Dikhan
45	Muhammad Haroon (disable) s/o Muhammad fayaz Dikhan	DPO Dikhan
46	Saadat khan s/o muhammad yousaf tank	DPO Tank
47	Farmanullah s/o hameedullah khan Bannu	DPO Bannu
48	Syed taswer hussain shah s/o syed chand shah Bannu	DPO Bannu
49	Kifayatullah s/o shah sawar khan Bannu	DPO Bannu
50	Babar Saeed s/o Sharifullah khan Lakki	Region Office Bannu
51	Aftab Alam Khan s/o gul Alam khan Lakki	Region office bannu
52	Muhammad Shoaib s/o Muhammad saifullah (police son) Lakki	
53	Jalal ud din s/o Mir Kagir Khan Police Son lakki	Investigation Nowshera

5	54	Irfanullah s/o haji Ghulam Muhammad Lakki	Investigation Lakki
5	55	Syed mehar ali shah s/o Muhammad akbar shah assistant grade clerk (E-1) CPO nowshera	Investigation nowshera
5	56	Farooq shah s/o farmanullah assistant grade	charsadda
5	57	Syed Muhammad tahir shah s/o syed Muhammad zahir shah, assistant grade clerk scret branch CPO nowshera	Elite Force CPO

MUHAMMAD SULAMAN KHAN DIG/Headquarter, For Provincial Police Officer, NWFP, Peshawar.

No.14668-96/E-111, dated 12.06.2009

HV

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

NOTIFICATION

No. / /E-III, PROMOTION AS OFFG: SENIOR CLERK: BPS-09. Having been recommended the DPC held on 05.07.2013, approved by Addl: IGP/HQrs, the following Junior Clerks are here promoted as Offg: Senior Clerk in (BPS-09) Rs. (6200-380-17600) with immediate effect:-

Their promotion will take effect from the date they actually take over the char of their higher responsibilities.

No. (7 / /E-III <u>Transfer/postings:</u> On promotion as Offg: Senior Clerk (BPS-09), their transfer posting detail given below are hereby ordered with including effect.

4	Name	D.O. Birth	Fr D=	
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	· ·			provision of good ACRs for the following:
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2.	Muhammad Abid		j,	Year 2010,29.09.2011 to 31.12.2011, Year 2012
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		12.10.68	i in volla	t Promoted conditionally subject to the Kohat Reg
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٠.	Muhammad Bilat	Kohat		2012 within 03 months.
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		24.02.08		t Promoted conditionally subject to the Kohat Reg provision of good ACRs for the year 2008 &:
4.	Ghaffar Ali		<u></u>	(2012 Within 03 months
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		Peshawar	CCP	01.01.2008 to 06.07.2008 & Year 2012
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ra:	zie Maula	Peshawar	2	9 ov.2011 to 31.12.2011 & Year 2012
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:	i		į£,	ACRS for the following branch
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٠.				1		provision of good ACRs for the following period / year within 03 months:
						191.01.4008 to 16.05.2008 or or page 1
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19	•	Muhammad Abid	DIKhan		!	within 03 months
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20	· -	Falak Naz	·			of good ACRs for the year 2012 within 03:
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247			05.04.77	Karal	k o	omoted conditionally subject to provision Kehat Region good ACRs for the period from .01,2008 to 30.06,7008
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27	Hah	ibullah			31.	2.2009 Year 2010 01.01.2011 to
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25	Shal	nid Ullah			-01.0	good ACRs for the period from
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18	Mub:	ammad Ayaz			19.0	7.2008 to 31 13 2005
′ ∤			Peshawar	Tele K.P	. UV.0	0.2011 01.01.2012 to 30.04.2012
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						2012 to 31.12.2012 within 03 months.
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*	30,	Tatheer Hussain	Kohat	Kohat Region	Promoted conditionally subject to provision of good ACRs for the following period/years within 03 months:- 61.01.2009 to 12.07.2009 Year 2011 & 2012	Senior Cler
.		Noor Zamarı	Swabi .	Mardan Region	Promoted conditionally subject to provision of good ACRs for the following period/years within 03 months: 11.07.2008 to 31.12.2008 Year 2011 & 2012	DPO/Swat
· <u> </u>	32.	Muhammad Tariq	· Mardan	Mardan Region	Promoted conditionally subject to provision	DPO/Swat
- I.	33/ <i>(</i>) 34.	Syed Inayat Hussain	<u> </u>	Kohat Region	Promoted.	Kohat Reg
		Iftikhar Khan	Nowshera	Inve: CPC	of good ACRs for the years 20116 2012	СРО ,
	35.	Fayaz Ali	Charsadda	Charsadda	Promoted conditionally subject to provision of good ACRs for the years 20118, 2012	<u> </u>
:	36.	Qasiar Khan .	Charsadda	Charsadda	Promoted conditionally subject to provision of good ACRs for the years 20118 2012	Voltage
.	7.	Muhammad Suliman	Swat	Malakand Region	Promoted conditionally subject to provision of good ACRs for the period from	
. 3	8.	Shoukat Alı	.Swat	Malakand Region	Promoted conditionally subject to provision of good ACRs for the period from	Malakand
3	9.	naL,aniM	Mardan .	Mardan Region	Promoted conditionally subject to provision of good ACRs for the period from	Warden Da
4	0.	Hidayat Ullah	Bannu	Bannu Region	11.09.2012 to 31.12.2012within 03 months. Promoted conditionally subject to provision of good ACRs for the year 2012within 03	DIVI
4	1.	Aftab ür Rehman	Karak	Kohat Region	Promoted conditionally subject to provision of good ACRs for the year 2012within 03 months.	Kohat F attached fo
4.		Zubaid ur Rehman	Peshawar	Special Branch	Promoted.	purpose of Hazara Reg Spl: Branci
		Shereen Zaman	. Bannu	Bannu Region	Promoted conditionally subject to provision of good ACRs for the year 2012within 03	
44		Asmat Ullah	DIKhan	D.I.Khan Region	months. Promoted.	PTC Hangi
45		mdad Ullah	Charsadda	FRP HQrs	Promoted conditionally subject to provision of good ACRs for the years 11.07.2008 to 31.12.2008 Year 2009 & 2010 within 63	_
46		Bakhsh Khan	Peshawar	Inv: CPO	Promoted conditionally subject to provision of good ACRs for the years 2009 6 2012	DCT SB
47	- \bar{\lambda}	Mian Said Wahid	· Swat	Malakand Region	within 03 months. Promoted conditionally subject to provision. of good ACRs for the year 2012 within 03 months.	Malakand Region
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2. 7.	. Khawas Khan	Mardan		<u> </u>	
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_	Muhammad Nawaz	Dir Upper .	Malakand	01.01.2010 to 25.06.2010 & Year 2012	•
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-	Farono Shah		. 11	6.09.2009 to 31.12.2009, year 2010,	
1	Farooq Shah	Charsadda (4.08.2011 to 31.12.2011& Year 2012 romoted.	•

(KHALID MASPOD)

Addl: IGP/Headquarters

For Provincial Police Officer,

Khyber Pakhtunkhwa Peshawar.

(Semonty list of Senior (Cerlo on 30-6-2015)

	i		DOMICILE	EDU:	DATE OF	DATE OF	DATE OF	RE	MARKS
	ŧ	BIRTH		QUAL:	APPOINTMENT	PROMOTION AS	RETTREMENT		
	<u></u>					SENIOR CLERK	i		-
002.	Imdad Uliah	14.01.74	Charsadda	FA	19.11.1998 N/Q	22.07.2013	13,01.2044		
					11.07.2008 IC				
303	Bakhsh Khan	1.2.05.62	Peshawar	10th	27.07.1993 N/Q	22.07.2013	13.04.2022		
	<u> </u>				11.07.2008 JC				
304.	Mian Said Wahid	04.03.68	Swat	FA	19.04.1988	22.07.2013	03.03.2028		
					Daftari				•
 	-				11.07.2008 JC		- \		
305.	Humayun Khan	01.12.68	Peshawar	10 th	29.03.1988 N/Q	22.07.2013	30.11.2028		
		ļ			11.07.2008 JC			die Contraction	
306	Sibghat IIIIah	05.02.81	- Bannu	FA	20.11.1996 N/Q	22.07.2013	04.02.2041	7,17	
			_		11.07.2008 JC			1	
307.	Umar Dher	05.06.64	Swat -	10 th	11.07.2008 JC	22.07.2013	04.06.2024	934	
								A STATE OF THE PARTY OF THE PAR	
308.	Gulab Hussain	20.03.63	- Kurram	FA	01.02.2000 N/Q	22.07.2013	10.03.2023		
			Agency		11.07.2008 IC	_ <.			<u> </u>
309.	Khawas Khan	03.04.61	Mardan	10 th	15.10.1991	22.07.2013	02.04.2021		
-					Daftri				
					11.07.2008 JC	į			
31.0.	Nusarat Shah	08.01.79	Peshawar	10 th	01.06.1999 N/Q	22.07.2013	07.01.2039		
•					11.07.2008 JC		;		
3 <u>1</u> 1.	Ihsanullah	18.02.87	Lakki	BA .	11.06.2009.	22.07.2013	17.02.2047	-	
F. B.]		Marwat						
31.2,	Shahzad	02.01:85	Kohat	10 th	11.06.2009.	22:07:2013	01.01.2045		-
313.	Syed Muhammad	27.01.90	Peshawar	B.Sc	12.06.2009	22.07.2013	26.01.2050		
والممال ال	Tahir Shah	27,01.70	i corawai	ט.טנ	14.00.2007	22.07.2013	70.01.20D0		

Registrar

SF-I

Supdt: Seeret

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S.S.

OS, CP

/NO	NAME	DATE OF BIRTH	DOMICILE	EDU:	DATE OF APPOINTMENT	DATE OF PROMOTION AS	DATE OF RETIREMENT	REMARKS
		· · · · · · · · · · · · · · · · · · ·	1	<u> </u>		SENIOR CLERK	<u> </u>	R. M.
314.	, Bilai Hussain	06.01.80	Peshawar	BA	12.06.2009	22.07.2013	05.01.2040	
315.	Ifrikhor Ahmad	16.03.86	Charsadda ·	БA	12.06.2009	22.07.2013	15.03.2046	
316.	Malik Aman Khan	06.05.85	Nowshera	B.Sc ·	. 12.06.2009	22.07.2013	15.05.2045	
<u>317.</u>	Saif ud Din	10.08.84	Kohat	F.Sc	12.06.2009	22.07.2013	09.08.2044	
313.	Farman Ali	11.03.87	Shangla	F.A	12.06.2009	22.07.2013	10.03.2047	
319.	Muhammad Nawaz	08.03.71	Dir Upper	ВА	1.2.06.2009	22.07.2013	<u>07.03.2031</u>	
320.	Muhammad Haroon	27.07.90	DIKhan	10 th	12.06.2009	22.07.2013	26.07.2050	
321.	Kifavat Ullah	14.05.88	Bannu	FA	12.06.2009	22.07.2013	13.03.2048	
322.	Muhammad Shoaib	05.04.88	Lakki	B.Sc	12.06.2009	22.07.2013	04.04.2048	
C/		! . !		(Hours)				
323.	lalal ud Din	22.02.84	Lakki	FA	12.06.2009	22.07.2013	01.02.2044	
324.	Irfanullah	08.04.89	Lakki	F.Sc	12.06.2009	22.07.2013	07.04.2049	
325.	! Faroog Shah	07.04.85	Charsadda	MA	12.06.2009	22.07.2013	06.04.2045	

(MIAN MUHAMMAD ASIF)

Addl: IGP/Headquarters, For Provincial Police Officer. Khyber Pakhtunkhwa, Peshawar.

No. 4/22-95 E-V, dated Peshawar, the 17

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

All Heads of Police Offices in Khyber Pakhtunkhwa.

All Branches in CPO, Peshawar.

Incharge, Central Registry Cell, CPO, Peshawar.

They are requested to inform all the officers serving under their command. Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within one month after the issuance of the list, otherwise no representation will be entertained.



OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA

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



To:

The Inspector General of Police, Khyber Pakhtunkhwa Peshawar.

Subject:

REPRESENTATION FOR REVISED SENIORITY

Memo:

Kindly refer to your office Memo. No.464-534/CPB dated

04/05/2017.

Junior Clerk Said Wali Khan of this office has submitted a

Representation for assigning revised seniority, which is forwarded for favorable

consideration please.

District Police Office,

To:-

The Addl: Inspector General of Police HQrs Khyber Pakhtunkhwa Peshawar.

Subject:

REPRESENTATION FOR PROMOTION AS SENIOR CLERK

R/Sir,

With profound respect and humble submission I beg to submit that I had submitted a Representation for Promotion as Senior Clerk in the year 2013 vide DIG Mardan Letter No.1928/ES, dated 03-04-2014, which is still pending in CPO KPK Peshawar, therefore, once again I am going to submit the present Representation based on the following justification/grounds:-

- That I was appointed as Junior Clerk on 11/06/2009 and a performing my duties up to the entire satisfaction of my superiors and there is neither a single complaint nor any punishment at my discredit.
- I have earned good reports (ACRs) during my whole service.
- 3. It is pertinent to mention here that 15 Junior Clerks etc. who were Junior to me were promoted in the year 2013 and though I was senior to them, was left from promotion without indicating any reason, besides no due consideration was paid to my 1st Representation, due to which I have been suffering a lot.
- 4. I have 'already submitted a representation for the purpose in the honor of competent authority vides this office Memo. No.2555/EC, dated 13-3-2017 copy enclosed for ready reference.

Therefore I once again approach your good self to kindly consider my case favorably and accord an order regarding my promotion as Senior Clerk and assigning my due seniority, for which I shall be highly obliged.

H

Yours Obediently

JC\Saidwali Khan s/o Misal Khan



OFFICE OF THE DISTRICT POLICE OFFICER, NOWSHERA



. -

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

To: -	The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
No <u> 건승관등 -</u>	/EC, Dated Nowshera the <u>aq/c3</u> /2019.
Subject:	REPRESENTATION FOR REVISED SENTORITY
Memo:	

It is submitted that Jr: Clerk Said Wali of this Office has submitted the attached Representation regarding his seniolity is sent for favour of consideration, please.

District Police Officer Nowshera



Worthy Chief Secretary
Govt: of Khyber Pakhtunkhwa.

Subject:

REPRESENTATION IN REPECT OF SENIORITY AND PROMOTION

Respected Sir,

The applicant submitted a series of application /_Representation in the above subject but no response has been received to the applicant.

The applicant submits the following grievance:-

- 1. That the applicant was appointed as junior clerk on 11.06.2009 and performing his duty up to the entire satisfaction of his superior and have earned good report during the course of his duty.
- 2. That the applicant was extremely astonished after coming to know that 15 juniors clerks who were junior to him were promoted in the years of 2013 and made them senior to him in the seniority list and he was left from promotion without any reasons, which is mala fide, illegal, un-constitutional, against rules /law, against the fundamental rights of applicant and principal of natural justice.
- 3. That it is worth to mentioned here that the applicants has already submitted representation to the high ups/competent authority regarding his seniority and promotion vide DIG Mardan letter No.1928/EC Dated 03.04.2014 and letter no.2555/EC Dated 13.03.2017 and DPO Nowshera letter No.5049/EC Dated 10.05.2017,and DDA letter no.188/AC dated 08.03.2018 respectively but to no avail.

It is therefore very humbly prayed that the case of the applicant may kindly be consider, fix his seniority in due place in the seniority list and maybe promoted as senior clerk please.

Yours obediently

Said Wali kha

Junior clerk

DPO Office Nowshera

Ald



- OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKIITUNKHWA Central Police Office, Peshawar.

_/AC, Dated Peshawar 8/3/2018

To

Inspector General of Police The

Khyber Pakhtunkhwa Peshawar.

Subject:-

REPRESENTATION FOR REVISED SENIORITY.

Meme:-

It is submitted that Jr. Clerk Said Wali of this office has submitted the attached Representation regarding his Seniority for favor of consideration, please.

For Inspector General of Police Khyber Pakhtunkhwa Peshawar

ATTESTED

The Worthy Inspector General of Police, Khyber Pakhtunkhwa Peshawar.

Subject: REPRESENTATION IN RESPECT OF SENIORITY AND PROMOTION

Respected sir,

The applicant submits the following grievances.

- That the applicant was appointed as Junior Clerk on 11/06/2009 and performing
 his duty up to the entire satisfaction of his superiors and have earned good
 reports during the course of his duty.
- 2. That the applicant was extremely astonished after coming to know that 15 Junior Clerk, who were junior to him were promoted in the year 2013 and made them senior to him in the seniority list and he was left from promotion without any reason, which is mala fide, illegal unconstitutional, against rules/law, against the fundamental rights of applicant and principal of natural justice. (Copy of seniority list is enclosed)
- That it is worth to mention here that the applicant has already submitted representation to the High Ups/Competent authority regarding his seniority and promotion vide DIG Mardan letter No. 1928/ES, dated 03-04-2014 and letter No. 2555/EC, dated 13/3/2017 and DPO Nowshera letter No.5049/EC, Dated Nowshera 10/05/2017 respectively but to no avail. (Copy enclosed)

It is therefore very humbly prayed, that the case of the applicant may kindly be considered, fixed his seniority in due place in the seniority list and may be promoted as senior clerk please.

00/1/2018

Your sincerely

IC Sald Wa! Khan S/o Misal Khan Nucli Civil CPo

PESC-PAR



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

F-(22)

Dated Peshawar 🐬/11/2019

NOTIFICATION

No. \$2.00 (30) 1.A. PROMOTION by proceedings of Departmental Promotion Kommune Meeting held on to the APP Post of a considering Administration APP Inspector Remarks of Service Bayes, the Service Bayes of the Service Bay

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	the grant the	One emiliar Mosselina, the excenditionally promoted to the policy of Sensor Clerk (1978-14) subject to completion of NCR, for the years 2016, 2017 and 2018 and its submession upto 31–22014)
11	Muhammad Shouth	Chief Traffic Office Peshawar
 15 .	Tassawar Hussann	Chief Traffie Office Peshawar
	Haroon Rashid	CCP Peshawar
7	Muhammad Anwar	Investigation Wing Bannu, (He is conditionally profilers to the rank of Senior Clerk (BPS-14) subject to completion of ACRs for the period/year 01.01.2015 16.05.2014, 15.09.2015 to 31.12.2015, 2015 01.01.2017 to 19.05.2017 and its submission 31.12.2019)
	Shirtle About 1	DPO Office Manschra
	Marir Ahmad	



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

PAKHTUNKHWA PESHAWAR

23)

for the period from 01.01.2014 to 16.04.2015 and 01.01.2018 to

in into 31-12-2019)

S. NO.	NAME	PRESENT POSTING
19	Ighal Razwan	DPO Office Swat
· · · · · · · · · · · · · · · · · · ·	Muhammad Nazir	DPO Office Kohat
21	This multiple	DPO Office Bunnu
22	Iñikhar Ah	DPO Office Mardan
23	Nazeer Mehdi	DPO Office Abbottabad
24	Shabeer Ahmud	Investigation Wing Mansehra
25	Saudat Ali	DPO Office Dir Upper
26	Waqar Ab	DPO Office Swabi
27	Sartai	DPO Office Mardan
28	Muhammad Saddique	DPO Office Swabi
<u> </u>	Raheel ur Rehman	AIG BDU Office Peshawar
30	Zia Ullah	RPO Orrice Malakand
31	Nuz Mahammad	DPO Office Buner
32	Attiq-ur-Rehman	CCP Peshawar
" ;	Muhammad Riaz	Investigation Wing Abbottabad
34	Maysood Ahmad	DPO Office Mansehra. (He is conditionally promoted to the rank of Sentor Clerk (BPS-14) subject to completion of ACRs for the period from 01 01.2017 to 31 12.2017 and 01 01.2018 to 31 12.2018 and its submission upto 31 12.2019)
35	Muhammad Riaz Khan	DPO Office Lakki Marwat
	(Sports)	
36	Sajid Ali (Sportsman)	* Training Office CPO Peshawar
37	Syed Hashmat Ali Shah	Police Sports Board, CPO Peshawar, (He is conditionally
	(Sports)	promoted to the rank of Senior Clerk (BPS-14) subject to completion of ACRs for the period from 01 01 2018 to 17.04 2018 and its submission upto 31 12.2019)
38.	Hayatullah (Sportsman)	Account Section CPO Peshawar, (He is conditionally promoted to the rank of Senior Clerk (BPS-14) subject to completion of ACRs for the period from 01.01.2018 to 31.12.2018 and its submission upto 31.12.2019)
39,	Faisal Khan	DPO Office Mardan
40.	Atta-ur-Rehman	Investigation Wing Mardan
41.	Syed Atiq-ur-Rehman	CCP/Peshawar
42.	Haji Gul	Commandant CPC Office Peshawar
43.	Muhammad Kamran Khan	Secret Branch CPO Peshawar
44.	Sejjad Alimad	Investigation Wing Charsadda
45.	Mushing Ahmad	Investigation Wing Charsadda
46.	Numan Zeb State Market	DPO Office Nowshera
47.	Mian Muhammad Umar	DPO Office Mardan
48	Muhammad	Mardan Wing Mardan
49,45		Bannu
50.	The second secon	
		Wing Bannu, (He is conditionally promoted Senior Clerk (BPS-14) subject to



FOR PUBLICATION IN THE KHYBE PARHTUNKHWA POLICE GAZETTE PART-II, ORDERS BY THE INSPECTOR

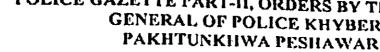
GENERAL OF POLICE KHYBER PAKHTUNKHWA PESHAWAR

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78	Aamir Shafiq	Application of the second of t
70		RPO Onite Mardan
N 0	Muhammad Ismail	CCP Peshawat
81	Khurshid Alam	SP I RP Range Konat
82 -	Nacem Taj	RPO Office Mardan
83	Rashid Khan	DPO Office Mardan
84	Said Ali	RPO Office Mardan
85	Aftab Alam Khan	SP/FRP Range D I Khan
86	Khair Nawaz	DPO Office Battagram
A STATE OF THE PARTY OF THE PAR		u 1 de la companya del companya de la companya del companya de la

PAKHTUNKHWA PESHAWAR

[S. NO.	"NAME	PRESENT POSTING
† 87	Inam-ul-Hassan	DPO Office Manschra, He is conditionally promoted to the rank of Senior Clerk (BPS-14) subject to completion
-		of ACRs for the period from 21.04.2015 to 31.12.2015.
		01.01.2017 to 31.12.2017 and 01.01.2018 to 31.12.2018
L	 	and its submission upto 31.12 2019) RPO Office Abbottabad
88	Wajid Mehmood	Investigation Wing Hangu
<u>89</u>	Tahir Abbas	Investigation Wing Bannu
90	Spadatullah	RPO Office Kohat
91	Babar Saced	DPO Office Tank, (He is conditionally promoted to the
92	Muhammad Ismail	early of Senior Clerk (BPS-14) subject to completion of
† -	•	ACRs for the period from 01.06.2018 to 31.12.2018 and
}		its submission upto 31 (2 2019)
F 93	Khuram Hussain	SP/FRP Range Hazara
F 94	Arif Jamil	Investigation Wing Karak
95.	Syed Fasawar Hussain Shah	SP/FRP Range D.I Khan, (He is conditionally promoted
_	•	to the rank of Senior Clerk (BPS-14) subject to completion of ACRs for the period from 01.01.2014 to
		31.12.2014, 01.03.2017 to 05 05.2018 and its '
		submission unto 31.12.2019)
— <u>_</u>	Shoukat Nawaz	Police School of Intelligence Abbottabad
96.		Investigation Wing Abbottabad
97	Khan Muhammad	Investigation Wing Kohat
_ 98	Shad Hussain	Investigation Wing Shangla
99.	Mansoor Ali	DPO Office Tank
100.	Saadat Khan	Tana (Mansahra
101.	Khurshid	- + Wabis (Wa is conditionally promoted to the
102.	Jehanzeb s/o Aurangzeb	The state of the s
	6 3	ACRs for the period from 01.01.2018 to 24.06.2018 and
_	D. Wis	its submission upto 31.12.2019)
		Investigation Wing Dir Lower
- 103.	Babar Khan	Investigation was a stranger
104.	Asad Ullah	DPO Office Battagram
<u></u>	Muhammad Tahir	DPO Office Dir Lower
$\frac{105.}{105.}$ +	Syed Mehar Ali Shah	Investigation Wing Nowshera, (fle is conditionally
106.	Syed Menar All Silan	1 1
-		1 A Cive 1. Ine Defroit 3 cm 3 4 cm
		2017 and 2018 and its submission up to 31 == ==
— —		The transport of the Dilling
- 107.	Muhammad Kamran	1 Completionar
108.	Rafiullah	promoted to the rank of Senior Clerk (BPS-14) subject to
b-r		
₹* 		completion of ACRS for the period 31.12.2019) 2017 and 2018 and its submission upto 31.12.2019) Advanced (He is conditional)
Ì		DPO Office Lakki Marwat, (He is conditional DPO Office Lakki Marwat, (BPS-14) subject
	Manzoor Khan	promoted to the rank of Senior Clerk (BPS-14) subject
199.	With the second	promoted to the rank of School Crown years 2014, 20
		promoted to the rank of Senior Cierk (2) 2014, 20 completion of ACRs for the period years 2014, 20
		completion of ACRs for the period years 12017 and 01.01.2018 to 24.06.2018 and its submiss
		uplo 31.12.2019)
	_	- tono (Car Ranni
-	& simullah Khan	RPO Office Bannu
		CCP/Peshawar
	Noor Gul	
		$\mathbf{u}^{(k)}$



THE INSPECTOR

S. NO.	NAME	PRESENT POSTING
ر.1:2		Elite Force HQrs: Peshawar
1:3		SP/FRP Runge Peshawar
:14.	Ibrar Ahmad	Investigation Wing Lakki Marwat, (He is conditionally
1 -		promoted to the rank of Senior Clerk (BPS-14) subject to completion of ACRs for the period/years 2014, 2015,
i		28.08.2016 to 31.12.2016, 2017 and 2018 and its
		submission upto 31.12.2019)
J 115.	Mishkatullah	DPO Office D.I Khan
_ 116.	Wajid Ali	CCP/Peshawar
.117 مر	Qari Muhammad Ilyas-Il	Special Branch
118.	Naveeg-ur-Rehman	CCP/Peshawar
119.	Iqbal Nawab	DPO Office Chitral
_ 120.	Muhammad Mudasir	AIG/BDU Office Peshawar
J 121.	Arif Ullah Khan	Elite Force HQrs: Peshawar
J 122.	Uzair Gul Faroogi	Special Branch
/ 123.	Asghar Khan	FSL/Peshawar
	Muhammad Ayaz	DPO Office Swat
125.	Suleman Shahzad	Special Branch
126.	Muhammad Younas Khan	DPO Office Bannu, (He is conditionally promoted to the
		rank of Senior Clerk (BPS-14) subject to completion of
		ACRs for the period from 01.01.2016 to 17.05.2016 and
		101.01.2017 to 19.05.2017 and its submission upto
j		31.12.2019)
- 127.	Sanaullah	Special Branch
	Sajid Ali Shah	SP/FRP Range Kohat,
	Asif Khan	CCP/Peshawar
		SP/FRP Range Hazara
	l'ogeer Ahmad	Chief Traffic Office Peshawar, He is conditional
131. S	Sohail Ahmad	promoted to the rank of Senior Clerk (BPS-14) subject
-		completion of ACRs for the years 2016, 2017 and 20
		and its submission unto 21 12 2010)
		and its submission upto 31.12.2019)

The terms and conditions of their promotion will be as under:-

Their promotion will be on probation for a period of one year and also extendable for another one year in terms of Section-6 (02) of Khyber Pakhtunkhwa, Civil Servant Act-1973 read with Rules-15 (01) of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989.

Their promotion will take effect from the date they actually assume the charge of their higher

responsibilities.

The premotion of officials having ACRs deficiency will be conditioned with submission of their remaining ACRs upto 31.12.2019. In case of non-compliance, they shall be considered deferred and a fresh Notification of the deferred officials shall be issued.

> Sd/-Muhammad Nacem Khan Dr.PSP Inspector General of Police Khyber Pakhtunkhwa, Peshawar.

Endst: No. and dated even.

Copy forwarded to the:-

Inspector General of Police: HQrs Khyber Pakhtunkhwa, Peshawar.



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

PAKHTUNKHWA PESHAWAR

- Addi: Inspector General of Police: Investigation, Khyber Pakhtunkhwa, Peshawar
- Addl: Inspector General of Police: Elite Force, Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, HQrs, Khyber Pakhtunkhwa Peshawar.
- Accountant General Khyber Pakhtunkhwa, Peshawar,
- Capital City Police Officer, Peshawar.
- Commandant FRP Khyber Pakhtunkhwu, Peshawar.
- Deputy Inspector General of Police, Training, Special Branch, CTD, IAB & Traffic Khyber Pakhtunkhwa, Peshawar,
- Commandant CPC, Khyber Pakhtunkhwa, Peshawar.
- All Regional Police Officers, in Khyber Pakhunkhwa.
- All DPOs and SsP/Investigations in Khyber Pakhtunkhwa.
- COS to the Worthy Inspector General of Police, Khyber Pakhtunkhwa.
- Chief Traffie Officer, Peshawar.
- Assistant Inspector General of Police, BDU, Khyber Pakhtunkhwa, Peshawar,
- Director FSL Khyber Pakhtunkhwa, Peshawar.
- Registrar, CPO, Peshawar.
- All concerned District Accounts Officers in Khyber Pakhtunkhwa.
- Office Supdts: Secret and Career Planning Branch CPO, Peshawar.
- PA to Assistant Inspectors General of Police: Estt: CPO Peshawar.
- Accountant, CPO Peshawar,

(SADIQ BAŁOCH) PSP

AIG/Establishment,

For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.



No. 6785-6887E-V, dated Peshawar the 26/12/2019

ORDER

 $On\ promotion\ as\ Senior\ Clerk\ in\ (BPS-14),\ the\ following\ Transfer/Posting\ o$ the Senior Clerks are hereby ordered as noted against their names, with immediate effect: -

S. NO.	NAME	FROM	ТО
1.	Ibrar Hussain	CCP Peshawar	To continue
2.	Qasim Jan	On arrival from NACTA	DIG/Telecommunication
		Islamabad	Office Peshawar
3.	Ajmal Khan	CCP Peshawar	To continue
4.	Zikria Khan	DPO Office Nowshera	To continue
5.	Noor-Ul-Arifeen	DPO Office Buner	To continue
6.	Ikram-Ul-Haq	On arrival from NACTA	CPO Peshawar
		Islamabad	
7.	Rashid Mehmood	CCP Peshawar	To continue
8.	Saifullah Khan	Investigation Wing Lakki Marwat	Investigation Unit CPO
9.	Muhammad Anees	CCP Peshawar	To continue
10.	Fazle Khuda	CCP Peshawar	To continue
. 11.	Muhammad Shoaib	Chief Traffic Office	To continue
		Peshawar	
12.	Tassawar Hussain	Chief Traffic Office	To continue
		Peshawar	
13.	Haroon Rashid	CCP Peshawar	To continue
14.	Nazir Ahmad	DPO Office Mansehra	DPO Office Abbottabad
15.	Iqbal Razwan	DPO Office Swat	To continue
16.	Muhammad Nazir	DPO Office Kohat	SP/FRP Range Kohat
17.	Ihsanullah	DPO Office Bannu	AIG/BDU Office
18.	Iftikhar Ali	DPO Office Mardan	Peshawar Investigation Swabi
19.	Nazeer Mehdi	DPO Office Abbottabad	To continue
20.	Shabeer Ahmad	Investigation Wing	Investigation Wing
21.	Saadat Ali	Mansehra DPO Office Dir Upper	Abbottabad To continue
22.	Waqar Ali	DPO Office Swabi	Investigation Wing
			Haripur
23.	Sartaj .	DPO Office Mardan	Investigation Unit CPO
24.	Muhammad Saddique	DPO Office Swabi	DPO Office Haripur
25.	Raheel-Ur-Rehman	AIG/BDU Office Peshawar	To continue

957 ~ 26/12/19



26.	Zia Ullah	RPO Office Malakand	To continue
27.	Niaz Muhammad	DPO Office Buner	Investigation Buner
28.	Attiq-Ur-Rehman	CCP Peshawar	To continue
29.	Muhammad Riaz	Investigation Wing Abbottabad	To continue
30.	Muhammad Riaz Khan (Sports)	DPO Office Lakki Marwat	FRP/HQrs: Peshawar
31.	Sajid Ali (Sportsman)	Training Office CPO Peshawar	CPO Peshawar
32.	Syed Hashmat Ali Shah (Sports)	Police Sports Board CPO Peshawar	To continue
33.	Faisal Khan	DPO Office Mardan	DPO Office Nowshera
34.	Atta-Ur-Rehman	Investigation Wing Mardan	CPO Peshawar
35.	Syed Atiq-Ur-Rehman	CCP Peshawar	FRP/HQrs: Peshawar
36.	Haji Gul	Commandant CPC Office Peshawar	Directorate of Training Office Peshawar
37.	Muhammad Kamran Khan	Secret Branch CPO	AIG/BDU Office Peshawar
38.	Sajjad Ahmad	Investigation Wing Charsadda	Commandant CPC Office Peshawar
39.	Mushtaq Ahmad .	Investigation Wing Charsadda	DPO Office Charsadda
40.	Numan Zeb	DPO Office Nowshera	DPO Office Swabi
41.	Mian Muhammad Umar	DPO Office Mardan	FRP HQrs: Peshawar
42.	Muhammad Haroon	Investigation Wing Mardan	FRP HQrs: Peshawar
43.	Inayat Ullah	DPO Office Bannu	DPO Office Bannu (He draw his salary from SP/Investigation Office Swat)
44.	Muhammad Jamal	DPO Office Mardan	To continue
- 45.	Syed Wali Khan	DPO Office Nowshera	CPO Peshawar
46.	Rahmatullah	Investigation Wing Karak	Investigation Unit CPO
47.	Muhammad Ilyas-I	CCP Peshawar	To continue
48.	Ghayas-Ud-Din	Police Training School Kohat	Directorate of Training Office Peshawar
49.	Muhammad Tariq	RPO Office D.I Khan	AIG/BDU Office Peshawar
50.	Faqir Muhammad	CCP Peshawar	CPO Peshawar
51.	Amjad Bilal	CCP Peshawar	Special Branch
52.	Shah Jehan	CCP Peshawar	To continue
53.	Hashmat Ali	DIG/Traffic Office Reshawar	To continue

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54.	Salman Khan	CTD/HQrs: Peshawar	To continue
55.	Sibghat Ullah	CCP Peshawar	To continue
56.	Amir Naseer	CCP Peshawar	CPO Peshawar
57.	Muhammad Abid	Investigation Wing Mansehra	RPO Office Hazara
58.	Shaheen Shah	CCP Peshawar	To continue
59.	Qasim Alzeeshan	DPO Office Nowshera	To continue
60.	Tahir Shah	CCP Peshawar	FRP/HQrs: Peshawar
61.	Gul Bibi	Investigation Wing Abbottabad	RPO Office Hazara
62.	Akbar Hayat	DPO Office Chitral	Investigation Dir Upper
63.	Waheed Shah	RPO Office Mardan	Special Branch
64.	Muhammad Arshad	On arrival from NACTA Islamabad	CPO Peshawar
65.	Rooh-Ul-Amin	Elite Force Mardan	EPTC/Nowshera
66.	Mian Umair	DPO Office Charsadda	Chief Traffic Office Peshawar
67.	Mudasar Khan	DPO Office Abbottabad	To continue
68.	Attiq-Ur-Rehman	DPO Office Orakzai	Special Branch
69.	Aamir Shafiq	SP/FRP Hazara Range	FRP/HQrs: Peshawar
70.	Shah Jehan	RPO Office Mardan	DPO Office Swabi
71.	Muhammad Ismail	CCP Peshawar	To continue
72.	Khurshid Alam	SP FRP Range Rohat	FRP/HQrs: Peshawar
73.	Naeem Taj	RPO Office Mardan	Chief Traffic Office Peshawar
74.	Rashid Khan	DPO Office Mardan	EPTC/Nowshera
75.	Said Ali	RPO Office Mardan	Investigation Wing Nowshera
76.	Aftab Alam Khan	SP FRP Range D.I Khan	FRP/HQrs: Peshawar
77.	Khair Nawaz	DPO Office Battagram	DPO Office Upper Kohistan
78.	Wajid Mehmood	RPO Office Hazara	SP FRP Hazara Range
79.	Tahir Abbas	Investigation Wing Hangu	DPO Office Haripur
80.	Saadatullah	Investigation Wing Bannu	Special Branch
81.	Babar Saeed	RPO Office Kohat	Chief Traffic Office Peshawar
82.	Khurram Hussain	SP FRP Hazara Range	FRP/HQrs: Peshawar
83.	Arif Jamil	Investigation Wing Karak	RPO Office Kohat

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84.	Syed Tassawar Hussain	SP FRP D.I Khan Range	Investigation Wing
	Shah	or the birtham tange	Haripur
85.	Shoukat Nawaz	Police School of Intelligence Abbottabad	DPO Office Abbottabad
86.	Khan Muhammad	Investigation Wing Abbottabad	To continue
87.	Shad Hussain	Investigation Wing Kohat	RPO Office Kohat
88.	Mansoor Ali	Investigation Wing Shangla	DPO Office Swat
89.	Saadat Khan	DPO Office Tank	CPO Peshawar
90.	Khurshid	DPO Office Mansehra	To continue
91.	Jehanzeb s/o Aurangzeb	DPO Office Kohat	RPO Office Kohat
92.	Babar Khan	Investigation Wing Dir Lower	To continue
93.	Asad Ullah	DPO Office Battagram	DPO Office Torghar
94.	Muhammad Tahir	DPO Office Dir Lower	To continue
95.	Muhammad Kamran	DPO Office D.I Khan	AIG/BDU Office Peshawar
96.	Wasim Ullah Khan	RPO Office Bannu	Commandant CPC Office Peshawar
97.	Noor Gul	CCP Peshawar	CTD/HQrs: Peshawar
98.	Zainullah Khan	Elite Force	To continue
99.	Muhammad Bilal	SP FRP Peshawar Range	Investigation Wing Swabi
100.	Mishkatullah	DPO Office D.I Khan	DPO Office D.I Khan (He draw his salary from Directorate of Training Office Peshawar)
101.	Wajid Ali	CCP Peshawar	To continue
102.	Qari Muhammad Ilyas-II	Special Branch	To continue
103.	Naveed-Ur-Rehman	CCP Peshawar	To continue
104.	Iqbal Nawab	DPO Office Chitral	Investigation Wing Dir Lower
105.	Muhammad Mudassir	AIG/BDU Office Peshawar	To continue
106.	Arif Ullah Khan	Elite Force	DSP PQR Office Peshawar
107.	Uzair Gul Farooqi	Special Branch	To continue
108.	Asghar Khan	FSL Peshawar	Investigation Unit CPO
109.	Muhammad Ayaz	DPO Office Swat	RPO Office Malakand
110.	Suleman Shahzad	Special Branch	To continue
111.	Sanaullah	Special Branch	To continue

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112.	Sajid Ali Shah	SP FRP Range Kohat	CPO Peshawar
113.	Asif Khan	CCP Peshawar	CPO Peshawar
114.	Tauqir Ahmad	SP FRP Hazara Range	FRP/HQrs: Peshawar

Sd/-MUHAMMAD KARIM KHANPSP

Deputy Inspector General of Police, HQrs, For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

Endst: No. & date even.

Copy forwarded to the: -

- Addl: Inspector General of Police: HQrs Khyber Pakhtunkhwa, Peshawar.
- Addl: Inspector General of Police: Investigation, Khyber Pakhtunkhwa, Peshawar.
- Addl: Inspector General of Police, Elite Force, Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police: HQrs, Khyber Pakhtunkhwa Peshawar.
- Accountant General Khyber Pakhtunkhwa, Peshawar.
- Capital City Police Officer, Peshawar.
- Commandant FRP, Khyber Pakhtunkhwa, Peshawar.
- Commandant, CPC, Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, Telecommunication, Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawar,
- Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, Traffic, Khyber Pakhtunkhwa, Peshawar.
- Regional Police Officers, Mardan, Kohat, Hazara, D.I Khan, Bannu & Malakand.
 COS to the Worthy Inspector General of Police, Khyber Pakhtunkhwa.
- Chief Traffic Officer, Peshawar.
- All concerned District Police Officers, in Khyber Pakhtunkhwa.
- Deputy Director Audit CPO Peshawar.
- Assistant Inspector General of Police, BDU, Khyber Pakhtunkhwa, Peshawar.
- All concerned Superintendents of Police, in Khyber Pakhtunkhwa.
- All concerned Superintendents of Police, FRP, in Khyber Pakhtunkhwa.
- Principal, Elite Police Training College, Nowshera.
- Director, Police School of Intelligence Abbottabad.
- Deputy Superintendent of Police, PQR, Khyber Pakhtunkhwa, Peshawar.
- Registrar, CPO, Peshawar.
- All concerned District Accounts Officers in Khyber Pakhtunkhwa.
- Office Supdts: Secret, CP and Central Registry Cell CPO, Peshawar.
- PA to Assistant Inspectors General of Police: Estt: CPO Peshawar.
- Accountant, CPO Peshawar.

ATTESTED

W.

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

98/8 INSPECTOR GENERAL OF POLICE,
7/8/1220 CENTRAL POLICE, OFFICE,

So, CPOT Viscoincity List By Sy-77

Dated Peshawar (20) July, 2021

PESHAWAR.

овона

As per direction of the Competent Authority the following appointment Northeathers of their Clerks against advertisement in the year 2008 vide Nos. 1453149-III. dated 11 to 2009, 196449-III, dated 12 06 2009 and 14697/F-III, dated 12.06,2009 have been marged and revised their morely on the Basis of ment, tage and qualification according to Section 17 Sub-Section (1)(a) of Appointment, Promotion & Transfer Rules 1984; Furthermore, their date of approximent will be considered one and the same i.e. 11.05,2009.

[Sr. 80.]	NAME	HOME DISTRICT
130.00	Const: Muhammad flyas	Peshawar
 ;	Const: Muhammad Asif	Peshawar
	Muhammad Zahir Khan	Peshagar
·}	Const: Saijad Khan	Baum
	Muhammad Jabbar Ahmad	Peshawar
2	Const: Ghayas ad Din	Kerbut
	Muhammad Tariy	D.L.Klim
-	Abdullah	Charsadda
<u>S</u> .	Fagir Muhammad	Peshawar
1-9		Peshawar
10	Amjad Bilad Shan Jehan	Peshassar
11	m	Marcha
<u>12</u>	Sheraz Ahmad	Peshawar
13	Amjad Ali	Nowshera
14	Const: Hashioat Ali Rahegin s/o Muhammad Nazir	Nowshera
15	Raheem s/o Munaminaa isazu	Mansehta
_16	Const: Shad Mahammad	Mardan
17	Suleman Khan	Pesluwar
18	Const. Sibgratullah	Charsadda
19	Surger Ahmad	D.J.Khau
20 21 V	Muhammad Noman	D.J.Khan
1 2 5	Mulammad Baroon	Peshawar
2200	Amir Nascer	Mansehra
1000	Muhammad Abid	Nowshera
17/18/20	Shaheen Shao	Nowshera
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Multanniad Qasini Alzeeshan	Charsadda
25 1	Hikhar Almad	Charsadda
$\frac{1}{28}$	Const. Tahir Shah	Abbottabad
28	L/Const: Gul Bibi	Chittal
7.9	N/Qusid Alaba Bayut	
30	Waheed Shali	Mardin
131	Bilal Hossain	Peshawar
32	Const: Melanimud Arshad	Mardan
- 33	Roohukuun	Mardan
	talal ud Din	Lusia
35	Const. Man Cinon	Chapatha
, ;	Mudasar Khan	ladishoddy,
-20	MIRRISH Period	D.I Khun
37	Muhammad Lanvir Alam	D LKhan
38	Mehm Nawaz Baloch	Karak
39	Const: Attiq to Relimin	Baumu
<u> </u>	Const. Engerbullah	Mardan
1 41	Muhammad Sawar Ellangota Asmat Khan	\$1,000

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OFFICE OF DE INSPECTOR GENERAL OF POLIC KHYBER PAKUJUNKBWA CENTRAL POLICE OFFICE. PESHAWAR.

- ₉₅	Minshaq Mutammad do Sultan Muharamad	Chamadda
-		Mardan
96 1	Hind são Mu Ananel	Mardan
97	Harcom sto Lad Badishah	Charaidda
- 38	Sajad Ahmed vo Tila Muhammad	Peshnoat
- Gsj	Islatii Sheraz Aluncii sto Mufti Lai Gol	Eolat
100	Shahzad s/o Daulat Khon	Charandda
1011	Tannoq Shah	Nowshera
102	Numan Zeb s/o Aurangzeb	Chursadda
103	Muhammad Kamran Khan s/o Abdul Qayyum	Peshawar
101	Jawad Ighal Khan s/o Javed Ali Khaki	Mardan
105	Mian Mahammad Umer sio Mian Tariq Ahmed	Nowshera
100	Syed Wah Khan soo Misal Khan	Mardan
107	Faisal Kleavsto Jilar Khan	
108	Muhammad Numan Khan s/o Haji Khan	Mardan
•	Badshah	Nowshera
109	Syed Meliar Ali Shah	

Total 109 candidates were appointed as Junior Clerks in the above mentioner modification wherein seventeen (17) appointed i.e. St. Nos. 02, 03, 04, 05, 08, 12, 13, 15, 19, 38, 40, 46 54, 61, 62, 72 and 108 have not been joined the Police Department.

Deputy Inspector General of Helice, HQIs: For Inspector Geperal of Police, Khyber Palhtunithwa. . . Deshawar.

Ludst: No. and dated even

Copy of above is forwarded to the;-

- 1. Addf: Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar.
- 2. Deputy Inspector General of Police, HQ1s; Khyber Pakhtunkhwa, Peshawar,
- (i) Capital City Police Officer, Peshawar.
- 4. Regional Police Officers, Mardan, Hazara, Malakand, Kohat, Hannu and D.I.Kha Regions.
- 5. COS to Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshsowar,
- 6. AIG/Establishment, Khyber Pakhtunkliwa, Peshawar.
- 7. Registrar, Central Police Office Peshawar.
- 8. Office Superintendent Secret, CPO Peshawar,
- 9. Office Superintendent Careet Planning Branch, CPO, Peshawai.

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

No.CPO/E-V/Seniority List/2454-72

Dated Peshawar.06.8.2020

ORDER

As per direction of the Competent Authority the following appointment notification of Junior Clerks against advertisement in the year 2008 vide Nos.14534-111, dated 11.06.2009, dated 12.06.2009 and 14697/E-111 dated 12.06.2009 have been merged and revised their seniority on the basis of merit, age and qualification according to Section 17 sub-section (1)(2) of appointment, promotion & transfer rules 1984. Furthermore, their date of appointment will be considered one and the same i.e 11.06.2009.

Sr.NO	NAME	HOME DISTRICT
1	Const: Muhammad ilyas	Peshawar
2	Const: Muhammad Asif	Peshawar
<u> </u>	Muhammad Zahir Khan	Peshawar
4	Const: Sajjad Khan	Bannu
5	Muhammad jabbar ahmad	Peshawar
6	Const: ghayas ud din	Kohat
7	Muhammad tariq	DIKhan
8	Abdullah	Charsadda
9	Fagir Muhammad	Peshawar
10	Amjad Bilal	Peshawar
11	Shah jehan	peshawar
12	Sheraz ahmad	mardan
13	Amjad Ali	Peshawar
14	Const: Hashmat Ali	Nowshera
15	Raheem s/o Muhammad nazir	nowshera
16	Const: shad Muhammad	mansehra
17	Suleman Khan	mardan
18	Const: Sibghatullah	Peshawar
19	Sareer ahmad	charsadda
20	Muhammad noman	DIKhan
21	Muhammad Haroon	Dikhan
22	Amir Naseer	Peshawar
23	Muhammad Abid	Mansehra
24	Shaheen Shah	nowshera
25	Muhammad Qasim alzeeshan	nowshera
26	Iftikhar Ahmad	Charsadda Charsadda
27	Const: tahir Shah	Charsadda 🔆
28	L/const; Gul Bibi	<u>Abbottabad</u>
29	N/Qasid Akbar Hayat	Chittai
30	Waheed Shah	Mardan
31	Bilal Hussain	Peshawar

32	Const: Muhammad Arshad	Mardan
33	Roohulamin	Maardan
34	Jalal ud din	Lakki
35	Const: Mian umair	charsadda
36	Mudasar Khan	abbottabad
37	Muhammad tanvir alam	Dikhan
38	Mehar Nawaz baloch	Dikhan
39	Const: attiq ur rehman	Karak
40	Const: Naqeebullah	Bannu
41	Muhammad Nawaz Khan s/o asmat khan	mardan
95	Mushtaq Muhammad s/o sultan muhammad	charsadda
96	Hail s/o mir ahmad	mardan
97	Haroon s/o LaL badsha	mardan
98	Sajjad ahmed s/o fida muhammad	charsadda
99	Mufti sheraz ahmed s/o mufti jan gul	peshawar
100	Shahzad s/o dualat khan	kohat
101	Farooq shah	charsadda
102	Numan Zeb s/o aurangzeb	Nowshera
103	Muhammad Kamran khan s/o abdul qayyum	Charsadda
104	Jawad iqbal khan s/o javed ali khaki	Peshawar
105	Mian Muhammad umer s/o mian tariq ahmed	mardan
106	Syed wali khan s/o missal khan	Nowshera
107	Faisal khan s/o jihar khan	Mardan
108	Muhammad numan khan s/o haji khan badshah	mardan
109	Syed mehar ali shah	Nowshera

Total 109 candidates were appointed as junior clerks in the above mentioned notification wherein seventeen (17) appointee i.e Sr.No.02,03,01,05,08,12,13,15,19,38,40,46,54,61,62,72 and 108 have not been joined the police department.

SALMAN CHOUDHRY PSP

Deputy Inspector general of police, HQrs,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

To

The Assistant Inspector General of Police, Establishment CPO Khyber Pakhtunkhwa Peshawar.

Subject:-

MERGING OF SENIORITY

R/Sir,

The applicant submits the following:-

- 1. That the applicant was appointed as Junior Clerk on 11.6.2009 vide Notification No.14531/E-III, dated 11.6.2009 & performing his duty up to the entire satisfaction his superior and have earned good report during the course of his duty (Copy of Notification attached)
- 2. That the applicant was extremely astonished after coming to know that Sr. Nos. 24,25,26,34,49,52,71,80,81,84,85,89,90 & 101. Which are most junior to the applicant, have been made senior vide order No.CPO/E-V/Seniority List/2454-72 dated 6.8.2020 without cogent reason and under the rule Section 17 Sub Section (1) (a), which is contrary to the said rule, against fundamental rights of the applicant and the very principal of natural justice. (Copy of merged Order & Notification of 12.6.2009, attached).
- 3. That according to Section 17 of Service Law (1) the Seniority list of civil servant (appointed to service, cadre of post) shall be determined:-
- (a) In case of persons appointed by initial recruitment in accordance with the order of merit assigned by the commission (or as the case may be the departmental selection committee) provided that persons selected for appointment to post in an earlier selection shall be rank senior to the persons selected in later selection. (Copy of Rule attached).

However, contrary to the above quoted rule the seniority of Senior Clerks appointed on 11.6.2009 & 12.6.20009 was merged, while there is no provision of merging the seniority of officials appointed on different dates, in above quoted Rules.

It is therefore, very humbly prayed that the merging of seniority may kindly be revoked and the applicant may granted his due seniority, promotion from due date & back benefits.

aid Walkhan

Yours Obediently

Senior Clerk

Audit Cell CPO Peshawar

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

No. 439 /AC, Dated Peshawar 2

29/9 12020

То

The

Inspector General of Police

Khyber Pakhtunkhwa Peshawar.

Subject: -

REPRESENTATION FOR REVISED SENIORITY.

Meme:-

It is submitted that Senior Clerk Said Wali Khan of this office has submitted the attached representation regarding his Seniority for favor of consideration, please.

Deputy Director Audit,
For Inspector General of Police

() Khyber Pakhtunkhwa Peshawar

1/



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

No. CPO/CPB/ 318

Dated Peshawar 10 November, 2020

To:

The

Deputy Director,

Audit, Central Police Office.

Peshawar.

Subject:

REPRESENTATION FOR REVISED SENIORITY

Memo:-

above.

Please refer to your office Memo: No. 439/AC, dated 29.09.2020 on the subject noted

In this regard it is submitted that application of Senior Clerk Said Wali Khan regarding revised seniority has already been revised with his colleagues according to merit and date of appointment. Therefore, his representation has filed by the Competent Authority.

The applicant may be informed accordingly.

(SYED AMIS-UL-HASSAN)

Registrar,

For Inspector General of Police, Khyber Pakhtunkhwa,

Peshawar.

ATTESTED

I- (38)

The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

SUBEJCT:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 07.11.2019 WHEREBY THE APPELLANT HAS BEEN GRANTED PROMOTION TO THE POST OF SENIOR CLERK (BPS-14) WITH IMMEDIATE EFFECTS NOT w.e.f 2013 WHEREIN JUNIORS TO THE APPELLANT WERE GRANTED PROMOTION TO THE POST SENIOR CLERK IGNORED APPELLANT UNLAWFULLY.

Respectfully Sir,

With due respect it is stated that the appellant is initially appointed as Junior Clerk vide order dated 11.06.2009 in the police department and since appellant appointment he is performing his duty efficiently and up to the mark of his superiors. After appointment of the appellant another notification was issued in which juniors to the appellant were appointed as Junior Clerks on the next date of the appellant appointment vide order dated 12.06.2009. After couple of year performing his duties entirely to the satisfaction of his superiors appellant was expected to be promoted to the post Senior (Clerk BPS-14) but in the meanwhile promotion Notification No.17477 in year 2013 was issued by the department in which juniors to the appellant were promoted to the post of Senior Clerk BPS-14) and ignored appellant without any justification. Department than issued promoted Senior Clerks (BPS-14) seniority list vides dated 17.06.2015 in which promoted juniors were apparently juniors to the appellant those who were appointed on the very next day of the appellant appointment. Resultantly the appellant felt aggrieved from the Promotion Notification No.17477 issued in the year 2013 preferred multiple representations to the concerned authority for consideration to the promotion of Senior Clerk (BPS-14) which were not duly considered by the department. After considerable period, the department issued impugned order dated 07.11.2019 granting promotion to the appellant to the post of Senior Clerk (BPS-14) with immediate effect not with effect from 2013 whereby juniors to the appellant were promoted to the post of Senior Clerk (BPS-14). Department again unstoppably stamped on the right of the appellant and issued notification dated 06.08.2020 in which all those who were appointed on different dates merged and considered their appointment from i.e 11.06.2009 to hide illegalities which is against law and rules.

It is therefore requested that on acceptance of this departmental appeal of the appellant the impugned order dated 07.11.2019 may be rectified by granting promotion to the appellant to the

post of Senior Clerk (BPS-14) w.e.f 2013 whereby juniors to the appellant were promoted to post of Senior Clerk (BPS-14), with all back benefits.

Dated: 25.08.2021

APPELLANT

SAID WANTENHAN
SENIOR CLERK (BPS-14)
AUDIT CELL CPO, PESHAWAR

D. M.

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

	OF 2021
SAID WALI KHAN	(APPELLANT)(PLAINTIFF) (PETITIONER)
VERSUS	
Police Department	(RESPONDENT) (DEFENDANT)
I/WeSAID WALI KHANDo hereby appoint and constitute, Advocate High Court, Peshawa compromise, withdraw or refer to arl Counsel/Advocate in the above noted his default and with the authority Advocate Counsel on my/our cost. I/w to deposit, withdraw and receive on amounts payable or deposited on my/o matter.	ar to appear, plead, act, bitration for me/us as my/our matter, without any liability for to engage/appoint any other we authorize the said Advocate my/our behalf all sums and
Dated//2021	CLIENT(S)
	ACCEPTED AFRASIAB KHAN WAZIR ADVOCATE HIGH COURT

Mobile No.**0312-9888752**

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 7845/2021	•
Said Wali Khan Senior Clerk	(Appellant)
VERSUS	
Inspector General of Police, Khyber Pakhtunkh	wa. etc(Respondents)

INDEX

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Para-wise comments		1-3
2.	Affidavit		4
3.	Authority Letter		5
4.	Copy of Notification No. CPO/E-V/Seniority List/ 2454-72, dated 06.08.2020	A	6-8
5.	Copy of Letter No. CPO/CPB/318, dated 10.11.2020	В	9

Respondents through .

SP/ Courts & Litigation, CPO, Peshawar.



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 7845/2021	
Said Wali Khan Senior Clerk	(Appellant)
VERSU	` 11
IGP, KP etc	(Respondents)
	Khyber Palestukhwa Service Tribunal
REPLY BY RESPOND	ENTS NO. 1 TO 4

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the appeal is not based on facts.
- b) That the appeal is barred by law and limitation.
- c) That the appeal is not maintainable in the present form.
- d) That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
- e) That the appellant is estopped to file the instant appeal by his own conduct.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.
- g) That the appellant has got no cause of action and locus standi to file the instant service appeal.

FACTS:-

- 1. Pertains to appointment and service record of the appellant.
- 2. Pertains to appointment record of Junior Clerks.
- 3. Incorrect. Notification of Junior Clerks against advertisement in the year 2008 vide Nos. 14531/E-III, dated 11.06.2009, 14667/E-III dated 12.06.2009 & 14697/E-III, dated 12.06.2009 had been merged and revised their seniority on the basis of merit, age and qualification according to Section 17 Sub-Section (1)(a) of Appointment, Promotion and Transfer Rules, 1989 vide this office order No. CPO/E-V/Seniority List/ 2454-72, dated 06.08.2020. Furthermore, their date of appointment will be considered one and the same i.e. 11.06.2009.

(Copy enclosed as Annexure "A"). The seniority of the appellant has been fixed according to his date of appointment with his colleagues.

- 4. Incorrect. As already explained in previous Para.
- 5. Pertains to record.
- 6. Incorrect. As already explained in Para No. 3 of Facts.
- 7. Incorrect. No illegalities exist on part of answering respondents. The appellant has been granted right place in seniority list with his colleagues.
- 8. Incorrect and misleading one. The representation of the appellant for revised seniority was rejected vide this office Letter No. CPO/CPB/318, dated 10.11.2020. (Copy enclosed as "B").
- 9. Incorrect. As already explained in preceding Para.
- **10.** The instant Service Appeal of the appellant is not maintainable on the following Grounds.

GROUNDS:-

- A. Incorrect. The orders of respondents are quite in accordance with law/rules and norms of natural justice.
- **B.** Incorrect. The appellant has been treated in accordance with law/ rules. No violation of Constitution of Pakistan, 1973 has exist on part of answering respondents.
- **C.** Incorrect. No discrimination has been done to the appellant by the answering respondents.
- **D.** Incorrect. No malafide has been committed by the answering respondents. Furthermore, the acts of the respondents are quit legally and efficiently. The appellant name exist rightly in the Seniority list with his colleagues.
- E. Incorrect. As already explained above.
- F. Incorrect. As already explained above.
- G. The respondents may also be allowed to raise additional grounds at the time of hearing/ arguments of instant Service Appeal.

PRAYER:-

Keeping in view the above stated facts and circumstances, it is therefore humbly prayed that the appeal is not maintainable being devoid of merits hence, may kindly be dismissed with costs, please.

Registrar,

Central Police Office,

Peshawar

(Respondent No. 3)

Deputy Director,

Audit Cell, Central Police Office,

Peshawar.

(Respondent No. 4)

Assistant Inspector General of Police, Establishment, Khyber Pakhtunkhwa,

Peshawar.

(Respondent No. 2)

Inspector General of Police Khyber Pakhtunkhwa

Peshawar.

(Respondent No. 1)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Inspector General of Police, Khyber Pakhtunkhwa, etc.....(Respondents)

AFFIDAVIT

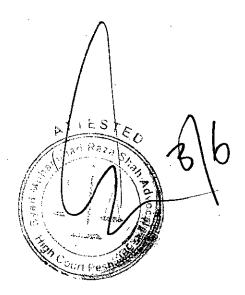
I, Mir Faraz Khan SP Courts & Litigation, CPO Peshawar do hereby solemnly affirm on oath that the contents of accompanying comments on behalf of Respondents 1 to 4 are correct to the best my knowledge and belief. Nothing has been concealed from this Honorable Tribunal.

DEPONENT

(MIR FARAZ KHAN)

SP Courts & Litigation, CPO, Peshawar. 11101-1425161-3

0336-5761727



(5)

AUTHORITY LETTER

Mr. Mir Faraz Khan SP/ Courts & Litigation, CPO Peshawar is authorized to submit Para-wise comments, defend the cases pertaining to Police Department on behalf of undersigned.

Inspector General of Police, Khyber Pakhtunkhwa, Aeshawar

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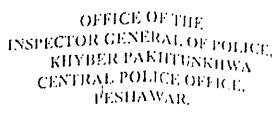
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OFFICE OF D INSPECTOR GENERAL OF POLICE RHYBER PAKIFUNKHWA CENTRAL POLICE OFFICE, PESHAWAR.

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	104	Jawad Iqbal Khan s/o Javed Ali Khaki	Peshuwar
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Total 109 candidates were appointed as Junior Clerks in the above mentioned notification wherein seventeen (17) appointed i.e. Sr. Nos. 02, 03, 04, 05, 08, 12, 13, 15, 19, 38, 40, 46, 54, 61, 62, 72 and 108 have not been joined the Police Department.

(SALMAN CHOUDHRX PSP

Deputy Inspector General of Police, HQrs:
For Inspector General of Police,
Khyber Pakhtunkhiwa.
Deshawar.

Endst: No. and dated even

Copy of above is forwarded to the:-

- 1. Addl: Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar.
- 2. Deputy Inspector General of Police, HQrs; Khyber Pakhtunkhwa, Peshawar.
- (3) Capital City Police Officer, Peshawar.
- 4. Regional Police Officers, Mardan, Hazara, Malakand, Kohat, Barana and D.I.Kha Regions.
- 5. COS to Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 6. AIG/Establishment, Khyber Pakhtunkhwa, Peshawar,
- 7. Registrar, Central Police Office Peshawar.
- 8. Office Superintendent Secret, CPO Peshawar.
- 9. Office Superintendent Cureer Planning Branch, CPO, Peshawar.

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Annega 4B.

OFFICE OF THE INSPECTOR GENERAL OF POLICE, KHYBER PAKHTUNKHWA CENTRAL POLICE OFFICE,

PESHAWAR.

No. CPO/CPB/ 318

Dated Peshawar D November, 2020

To:

The

Deputy Director,

Audit, Central Police Office,

Peshawar.

Subject:

REPRESENTATION FOR REVISED SENIORITY

Memo:-

Please refer to your office Memo: No. 439/AC, dated 29.09.2020 on the subject noted

above.

In this regard it is submitted that application of Senior Clerk Said Wali Khan regarding revised seniority has already been revised with his colleagues according to merit and date of appointment. Therefore, his representation has filed by the Competent Authority.

The applicant may be informed accordingly.

(SYED ANIS-UL-HASSAN)

Registrar,

For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.