24<sup>th</sup> April, 2023

24<sup>th</sup> April has been declared as public holiday on account of Eid-Ul-Fitr, therefore, the case is adjourned. To come up for the same on 05.07.2023.

Reader

5<sup>th</sup> July, 2023

- 1. Learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General alongwith Mr. Hikmat Khan, S.I (Legal) for the respondents present.
- 2. Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 30.10.2023 before D.B. P.P given to the parties.

(Rashida Bano Member (J)

(Kalim Arshad Khan) Chairman

\*Mutazem Shah\*

14<sup>th</sup> Dec. 2022

SCANNED KPST Peshawan Due to strike of the Bar and Mrs. Rozina Rehman, learned Member (J) being on leave, this matter is adjourned to 02.03.2023 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.

(Fareeha Paul) Member(E)

O2.03. 2023 Clerk of learned counsel for the appellant present.

Mr. Hikmat Khan, ASI alongwith Mr. Muhammad Riaz Khan
Paindakhel, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 24.04.2023 before the D.B. Parcha Peshi given to the parties.

(Eareeha Paul) Member (E) (Salah-ud-Din) Member (J)

SC TOTAL



Learned counsel for the appellant present. Mr. Kabirullah Khattak Addl. AG for respondents present.

Vide order sheet dated 25.11.2021 last opportunity was granted to the respondents to submit reply/comments on 14.12.2021. On the date fixed, the respondents have failed to submit reply and another last chance was granted subject to payment of cost of Rs. 2000/. Even today the respondents have failed to furnish the requisite reply. Hence defence of the respondents is struck off. To come up for argument on 02.08.2022 before S.B.

2-8-2022

Chairman

Proper DB not avoilable the case is adjourned to 31-10-2022

Reader

31<sup>st</sup> Oct., 2022 Counsel for the appellant present. Mr. Naseerud Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeks adjournment in order to further prepare the brief. Adjourned To come up for arguments on 14.12.2022 before the D.B.

(Fareeha Paul) Member (E)

(Kalim Arshad Khan) Chairman 25.11.2021

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

Directions of the D.B as per order sheet dated 15.07.2021 are very well in the knowledge of learned AAG however, he requested that keeping in view the importance of respondent No.3, the office concerned has been contacted and the written reply/parawise comments committed to be submitted on the next date. The request of learned AAG is acceded to but as a last chance. To come up for written reply/comments on 14.12.2021 before S.B.

(MIAN MUHAMMAD) MEMBER (E)

14.12.2021

Junior to counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney for respondents present.

Written reply/comments not submitted despite last opportunity. Requested for further adjournment. Adjournment granted subject to payment of cost of Rs. 2000/- which shall be borne by respondents from their own pockets. To come up for written reply/comments on 21.02.2022 before S.B.

(MIAN MUHAMMAĎ) MEMBER (E)

21.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct therefore, case is adjourned to 12.04.2022 for the same as before.

Junior to counsel for the appellant present. Mr. Kabirullah Khattak learned Addi. AG for respondents present.

Reply/comments on behalf of respondents not submitted despite last chance, therefore, the appellant in hand is posted to D.B for arguments on 15.07.2021.

Atiq Ur Rehman Wazir) Member (E)

15.07.2021

Junior to counsel for appellant present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Case was fixed for arguments in pursuance to the direction given on 01.04.2021 however neither comments have been filed nor any request was made for extension of time. Learned A.A.G made request for extension of last chance; granted with direction to furnish reply in office within 10 days. In case the respondents failed to submit comments within further extended stipulated time from today, they shall have to seek extension of time through written application citing sufficient reasons. Otherwise, their right for submission of written reply/comments shall stand ceased. To come up for arguments on 25.11.2021 before D.B.

(Rozina Rehman) Member (J)

Chairman

04.11.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional AG for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned Additional AG request for time to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 10.12.2020 on which date to come up for written reply/comments before S.B.

(MUHAMMAD JAMAL KHAN)-MEMBER (JUDICIAL)

10.12.2020

Junior counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Representative of respondents is not in attendance, therefore, case is adjourned on the request of learned A.A.G with direction to submit written reply/comments positively, on 03.02.2021 before S.B.

(Rozina Rehman) Member (J)

03.02.2021

Junior to counsel for the appellant and Addl. AG for respondents present.

Learned Additional Advocate General seeks time to furnish reply/comments. He is required to contact the respondents and facilitate the submission of reply/comments on 01.04.2021 before S.B, as a last chance.

20.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 14.07.2020 for the same. To come up for the same as before S.B.

Reader

14.07.2020

Counsel for the appellant and Addl: AG for respondents present.

Counsel for the appellant submitted an application for extension of time to deposit security and process fee. The appellant is directed to deposit the same with a week, thereafter notice be issued to the respondents for written reply/comments.

Adjourned to 15.09.2020 before S.B.

(Mian Muhammad) Member(E)

15.09.2020

Counsel for the appellant present.

Submitted an application for extension of time to deposit security and process fee which have not been deposited within due time.

Application is allowed. The appellant is required to deposit security and process fee within three working days from today. Thereafter, notices be issued to the respondents for submission of reply/comments on 04.11.2020 before S.B.

Chairman

Security & Process Fee

04.03.2020

F)2

P

Counsel for the appellant Muhammad Buzurg Baig Preliminary arguments heard. It was present. contended by learned counsel for the appellant that the appellant was promoted as 'confirmed ASI on 25.01.2016 but the same was withdrawn vide order Police the Regional 01.07.2016 by dated Officer/competent authority without giving any notice or personal hearing on the ground mentioned in the appellant order, therefore, the impugned departmental appeal on 07.05.2019 but the same was not responded hence, the present service appeal. It was further contended that since the appellant was promoted as confirmed ASI after all the codal formalities and the promotion order withdrawn by the competent authority without providing opportunity of hearing, therefore, the impugned order is illegal and liable to be set-aside.

The contention raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 20.04.2020 before S.B.

(MUHAMMAD AMIN KHAN KUNDI) MEMBER



31.10.2019

Mr. Mir Zaman Safi, Advocate for appellant present.

Requests for adjournment as learned senior counsel for the appellant is engaged before the Honourable High Court today.

Adjourned to 11.12.2019 but as last chance.

OFFICE

Chairman'

11.12.2019

Junior to counsel for the appellant and Addl. AG present.

Requests for adjournment due to general strike of the Bar today. Adjourned to 20.01.2020 before S.B.

Chairman

20.01.2020

Junior to counsel for the appellant present.

Requests for adjournment due to general strike of the

Bar. Adjourned to 04.03.2020 before S.B.

Chairmah

## Form- A

# FORM OF ORDER SHEET

Court of	 <del>i</del> .	
se No	1160/ <b>2019</b>	

	Case No	1160/2019
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/09/2019	The appeal of Mr. Muhammad Bazurg Baig resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution
esi Pesi	NED 31	Register and put up to the Worthy Chairman for proper order please.  REGISTRAR
2-	1910919	This case is entrusted to S. Bench for preliminary hearing to be put up there on
		CHAIRMAN
	24.10.2019	Counsel for the appellant present.
	<b>,</b>	Learned counsel for the appellant requests for adjournment in order to further prepare the brief.
		Adjourned to 31.10.2019 for preliminary hearing before S.B.
		Chairman

The appeal of Muhammad Buzurg Baig Sub Inspector Traffic Management School Kohat received today i.e. on 02.09.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Copy of Writ Petition in respect of appellant and judgment dated 28.3.2014 mentioned in para-4 of the memo of appeal are not attached with the appeal which may be placed on it.
- 5- Annexures of the appeal are illegible which may be replaced by legible/better one.
- 6- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1535 /s.T, Dt. 02/9 /2019.

REGISTRAR —
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv.

Mote Si,

All objections have been senoved, hence se-submitted doclay dated 18.9.2018.

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# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, **PESHAWAR**

APPEAL NO. 160 /2019

MUHAMMAD BUZURG BAIO,

VS

**POLICE DEPTT:** 

**INDEX** 

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	***************************************	1- 4.
2.	Order	Α	5- 12.
4.	Impugned order	В	13.
5.	Circular	G	14- 15.
6.	Application	D	16- 17.
7.	Judgment	E	18- 22.
8.	Proforma	Ţ. F	23.
9.	Notification	G	24- 32.
10.	Departmental appeal	H	33.
11.	Vakalatnama		34.

**APPELLANT** 

THROUGH:

NOOR MOHAMMAD KHATTAK ADVOCATE

## **BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL** PESHAWAR ~

APPEAL NO. 1160 /2019

Kayber Pakhtukhwa

Mr. Muhammad Buzurg Baig, Sub Inspector (Officiating), Traffic Management School, Kohat.

## **VERSUS**

- 1-The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2-The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
- 3-The Deputy Inspector General of Police, Malakand Region, at Saidu Sharif Swat.

..... RESPONDENTS

..... APPELLANT

UNDER SECTION 4 OF THE APPEAL **PAKHTUNKHWA SERVICE TRIBUNAL** ACT AGAINST THE IMPUGNED ORDER DATED 1.7.2016 WHEREBY THE CONFIRMATION ORDER APPELLANT TO THE RANK OF SUB INSPECTOR HAS BEEN WITHDRAWN AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

#### PRAYER:

That on acceptance of this appeal the impugned order dated 1-07-2016 may very kindly be set aside and the Filedto-day appellant and the confirmation order of the appellant dated 25.1.2016 may kindly be restored with all back benefits. That the respondents may further please be directed to consider the appellant for officiating promotion to the Rank of Inspector w.e.f. 2.3.2017 with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

# R/SHWETH: **ON FACTS:**

1. That the appellant joined the respondent Department as Constable at Malakand Region and on satisfactory

Registrai Re-submitted to -day and filed.

performance was promoted to the Ranks of Head Constable and Assistant Sub Inspector.

- 2. That where after the appellant was promoted to the Rank of Officiating Sub Inspector and was confirmed in the Rank of Sub Inspector on the proper recommendation of Departmental Promotion Committee vide order dated 25.1.2016. That accordingly the name of the appellant was brought into list "E". Copy of the order is attached as annexure.
- 3. That all of a sudden the confirmation order of the appellant in the Rank of Sub Inspector has been withdrawn without any solid reason vide impugned order dated 1.7.2016. That it is pertinent to mention that according to the circular dated 11.9.2004 the period spent in training institutes including traffic training school be counted towards confirmation as Sub Inspector but inspite of that the respondents withdrawn the order of confirmation of the appellant. Copies of the impugned order and circular are attached annexure ...... B and C.
- 4. That all the S.I's of Malakand Region including the appellant were not selected for upper college course during the year 2003 to 2009 due to law and order situation in Malakand Region. That later on in the year 2009 the respondent no.1 issued standing order whereby upper college course was declared mandatory for confirmation, and further promotion. That colleagues of the appellant feeing aggrieved filed writ petition No.231-M/2013 before the Peshawar High Court Dar UI Qaza Bench swat and vide judgment dated 28.3.2014 the same was disposed of with the direction to decide the Departmental appeal of the petitioners within a period of 30 days. Copies of the application and judgment are attached as annexure.
- That all those S.I's who filed above mentioned writ petition were promoted to the Rank of Inspector (BPS-16) on officiating basis without the condition of upper college Course vide Notification dated 2.3.2017 while the appellant was ignored on the reason that unless and until his withdrawal order regarding confirmation in the Rank of Sub Inspector is not being set aside he will serve the Department in the present rank. Copies of the proforma and Notification are attached as annexure

#### **GROUNDS:**

- A- That impugned order dated 1-7-2016 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That, the treatment meted out to the appellant clearly based on discrimination and malafide and as such the respondents violated the principle of natural justice.
- D- That the case of the appellant is clear violation of the Law & Rules of "Locus Poenitentiae" meaning thereby that once an order has been issued can not be reverted/ withdrawn unilaterally".
- E- That neither notice nor chance of personal hearing has been given by the respondents to appellant before issuing the impugned orders dated 1.7.2016 against the appellant.
- F- That appellant is fully entitled for his ante dated seniority and officiating promotion to the Rank of Inspector in light of the prevailing Rules.
- G- That all those S.I's who filed writ petition were promoted to the Rank of Inspector (BPS-16) on officiating basis without the condition of upper college Course vide Notification dated 2.3.2017 while the appellant was ignored on the reason that unless and until his withdrawal order regarding confirmation in the Rank of Sub Inspector is not being set aside he will serve the Department in the present rank.
- H- That the respondents acted in arbitrary and malafide manner while issuing the impugned order dated 1.7.2016 against the appellant.

- I- That it is pertinent to mention that according to the circular dated 11.9.2004 the period spent in training institutes including traffic training school be counted towards confirmation as Sub Inspector but inspite of that the respondents withdrawn the order of confirmation of the appellant.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 02.9.2019

APPELLANT

**MUHAMMAD BUZURG BAIG** 

THROUGH:

NOOR MOHAMMAD KHATTAK

8.

MIR ZAMAN SAFT

## **BETTER COPY OF PAGE-5**

From:

The Regional Police Officer,

Malakand, at Saidu Sharif, Swat.

To:

The Addl: Inspector General of Police,

Special Branch, Khyber Pakhtunkhwa, Peshawar.

The Commandant Elite Force, Khyber Pakhtunkhwa, Peshawar.

The Commandant, PTC Hangu.

The Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.

The Deputy Inspector General of Police, Traffic, Khyber Pakhtunkhwa, Peshawar.

The Director, Anti Corruption Establishment, Khyber Pakhtunkhwa, Peshawar.

All District Police Officer and Head of Investigation, In Malakand Region.

No. 355-72/E, dated Saidu Sharif, the 25.01.2016

Subject:

## **CONFIRMATION AS SUB INSPECTOR**

#### Memorandum

Consequent upon the recommendation by the DPC held in this office on 10/01/2016 and permission accorded by the CPO, Peshawar letter No. 3377/E-III, dated 17/12/2015, the following Sub Inspectors in List-E of this Region have been considered suitable for confirmation in the Rank of Sub Inspectors subject to the production of satisfactory ACR for the period and qualifying mandatory training/course according ACR for the period and qualifying mandatory training/course according order No. 8/2015 as noted against their name:-

S. No.	Name & No.	Present Posting	Recommendation
1.	SI Muhammad Asif No. 724	Shangla	Recommended for confirmation as SI conditionally subject to production of clear ACRs for the years 2010, 2013, 2014 and qualifying Mandatory Training/courses according to SO No.3/2015 earning two (2) points.
36.	SI Muhammad Buzurg Baig No. 433/M	Traffic School Peshawar	Recommended for confirmation as SI conditionally subject to qualifying Mandatory Training/Courses according to SO No. 3/2015 earning two(02) points.

APPESTED

Regional Police Officer, Malakand, at Saidu Sharif Swat.

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C

The Regional Police Officer, Malekand, at Saide Sharif, Swat.

The Addi: Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawac.

The Commandant Elite Force, Khyber Pakhtunkhwa, Peshawar.

The Commandant, PTC Hangu.

The Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.

The Debuty Inspector General of Police, Traffic, Khyber Pakhtunkhwa, Peshawar.

The Director, Anti Corruption Establishment, Khyber Pakhtunkhwa, Peshawar.

All District Police Officer and Head of Investigation, In Malekand Region.

No.

/E, dated Saids Sharif, the 25-01-/2016.

Subtect:

CONFIRMATION AS SUB INSPECTORS.

fiel grentum.

Consequent upon recommendation by the DPC hold in this office on 19/01/2016 and permission accorded by the CPO, Peshawar vide letter No. 3377/E-TD, Cated 17/12/2015, the following Sub-inspectors on List-E of this Region have been considered suitable for confirmation in the tank of Sub-inspectors subject to the production of satisfactory ACR for the period and qualifying mandatory training / course according to Standing Order No. 3/3015

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·	742	= & Nc.	Present Posting	Recomm	er stien
1	S: Wuhammad	Parent No. 1.55	in single	Figure onder for conditions and subject to for the price from 01 year 2011, 2014 and Treat of Conservations of the conditions of the condi	or Varietier Spirit (1995) ps decree in the Legis (1905) to 1937 to 1906 questione had automorphism to 1908 to
: : :: :::::::::::::::::::::::::::	Si Zeler Khan	No. Sesas	ACL roy Voper	nem grive (02) point. Rect meanded for cond chally subject to family (02) points.	
3. j	Si Masen Khan	ļ	Tr Ult	Racot precised for conditionally subject. Training Courses according to (SA) points.	entinographic in the second and the
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17.	ş:	Skaza:	Khan	No	375/W	erv: Suner	Recommended for confirmation, as \$1 conditionally subject to production of clear ACRs for the years 2010, 2013, 2014 and qualifying Mandatory Training / Courses according to \$0 No. 3/2015, earning two (02) points.
1	51	Artfur	Reholan	No.	275/W	Inv: Dir Lover	Recommended for confirmation as 51.
	S:	Sotter	Balç,	No.	381/M	Chitral	Recommended for confirmation as St. conditionally subject to production of clear ACR for the year 2014 and qualifying Mandatory Training / Courses according to SC No. 3/2015, earning two (02) points.
20.	S:	Saec	iullah	No.	38574	Chitral	Recommended for confirmation as \$1 conditionally subject to production of cleas ACP for the year 2014 and qualifying Mandatory Training / Courses according to \$0 No. 3/2015, earning two (02) points.
21.	SI	Karin	eullah	No.	391/%	inv: Shangla	Recommended for confirmation as SI conditionally subject to production of clear ACR for the period from 22/06/2013 to 31/12/2013, year 2014 and qualifying Mandatory Training / Courses according to SO No. 3/2015, syming two (02) points.
22.	31	She	Gul	No.	128/14	Inv: Swat	Recommended for confirmation as 5!.
-23.	51.	Lal 5	aid Shah	No	270.td	Buner	Recommended for confirmation se Si conditionally subject to production of clear ACE for the year 2013 and qualifying Mandatory Training / Courses according to SO No. 3/2015, estuding two (92) points.
24.	\$	Muh	ಉಗಾತತೆ ನಿತ್ಯ	a No.	241#A	Dir Lower	Recommended for confirmation as 85 conditionally subject to production of clear ADR for the year 2014 and qualitying Mandatory Training / Courses according to 50 Nc. 3/2015, earning two (02) points.
25.	Si	Pini	ı Nawez	No.	144/14	Dir Upper	Recommended for confirmation as St conditionally subject to production of clear ACR for the year 2014 and qualifying Mandatory Training / Courses according a SO No 3/2015, saming two (02) points.
26.	8!	Muin	aromud Ayu	ib No.	178/iv	Dir Lower	Recommended for construction as Signature of Conditionally subject to qualifying Mandatory Training / Courses according to SC No. 3/2015 earning two (02) points.
27.	93	Mon	in Khan	No.	4Z50).	Swat	Recoinmended for confirmation as Si conditionally subject to production of clear ACRs for the years 2013, 2014 and qualifying Mandatory Training / Colores according to SC No. (\$2015, earning two (\$3) points.
28.	S		ammed man	No.	133/1/	bry, Swar	Recommended for confirmation as 5 conditionally subject to qualifying Mandators Training / Courses attording to SO No. 3/2016 earning two (QZ) points.
29.		Azi:	ur Renman	No.	20694	lov: Shangta	Recommended for confirmation as Si- conditionally subject to production of clear ACR for the year 2010; and qualifying "Mandatory Training"/ Courses according to SO No. 3/2015, econing one (Q1) point
36.	ε:	Mi F	-syat .	No.	217 W	Chigal	Foroimmended for confirmation as Standillonally subject to production of clear ACPs for the penod from 06/08/2013 to 31/12/2013, year 2014 and cualifying Macaziony Training Courses according to SO No. 3/2015, azming two (02) points.
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33	St Yous	af Khan	No	230	264	Swa!	Recommended for Confirmation as St.
32	. SI Amir	Rehman .	No.	- 444	, M	Oir Levi	Recommended for confirmation as Si
33	. SI Malai	ζ Zada	No	427	M	fliuner Swat	Recommended for confirmation at 31
34.	Si Khusi	1 Murao	No.	397	M	Chitral	Recommended for confirmation as SI conditionally subject to production of clear ACRs for the period from 01/04/2013 to 31/12/2013, year 2014 and qualifying Mandatory Training / Courses according to SO No. 3/2015, earning two (92) points.
35.	SI Feroz	Khan	No.	400	M :	inv: Shengis	Recommended for confirmation as SI conditionally subject to production of clear ACRs for the years 2013, 2014 and qualifying Mandatory Training Courses according to SC No. 3/2015, earning we (02) points.
36	S: Muhan Eaig SI Bakh	amad B.:zur	140.	4337		Traffic School Pash:	Recommended: for confirmation, at St conditionally subject to qualifying Mandatory Training / Courses according to SO No. 3/2015, earning two (02) points.
· · · · · · · · · · · · · · · · · · ·	·		N:)	435/1	1 ;	Suner	Recommended for confirmation as St.
38.	SI Earkat	Shah	No	4170	1	Swat	Recommended for confirmation as SI conditionally subject to production of clear ACR for the year 2014 and qualifying standatory Training / Courses according to SC No. 3/2015.
39.	31 Խյսեցող	mad Faroog	No.	41670		ilir i ower	Recommended for confirmatic as Si conditionally subject to production or clear ACRs for the years 2013, 2014 and confifting Mandatory Training / Courses accoming to SO No. 2015, caming two (02) point.
40.	Si <sup>c</sup> azal Ro	lanen.	No.	15 M		fiv: Swa:	Recumended for confirmation as SI confidently subject to production of clear ACRs for the years 2010 2011, for the period from 044-7/2012 to 15/09/2012, year 2013 and qualifying Mandalary Training, Courses eco roting to SO No. 3/2015, earning two (02) polits.
<i>3,</i> 1.	Si Abdul Ka	oir	No.	15 Pvi		Swa!	Recommended for confirmation at 51 conditionally subject to production of clear ACR for the year 2014 and qualifying Mandatory Training / Courses according to SC No. 9/2015.
s	Shah Kha	lie	No i	E-M :		iv Du ower	Recommended for confirmation as St contributed by qualifying Mandatory Training Courses according to SO No. 372015.
43. S	0.60		No. 2	Olvi .		sa	Recommended for confirmation as \$1 conditionally subject to quelifying Mandatory
44. Si	Shamroz	han	No. 38	AV.	2		
45 SI	Gul Zamir		No. 44	-	пy	Di- C	Recommended for confirmation as SI (secommended to confirmation as SI andifformally subject to qualifying (Ambittory raining / Oourset, incoording to SO (49, 5/2015) (ming two (02) points.)
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si Gola Alam  5. Si Muhammad Varis	No.	308.M	Swat	Recommended for confirmation as Si conditionally subject to production of clear ACR for the period from 24/06/2013 to \$1/12/2013.
5. St. Muhammad Ylaris	ĺ		A	01-01/2014 to 31/05/2014.
1 '	No.	3127.1	CTD/Oir Upper	Recommended for confirmation as 51 conditionally subject to qualifying Mendatory Training / Courses advording to SO Isc. 92015, conding two (02) points.
5. St. Newat Khan	Ño.	322/#	fov: Surier	Recontinented for confirmation as 51 conditionally subject to production of clear ACR for the year 2013 and qualifying Mandatory Training / Courses according to SC Ne 0/2015, earning two (02) points.
7. Si Salahud Din	Ne.	326/M	lov: Dir Upper	Recommended for confirmation as Si- conditionally subject to production of clear ACR for the year 2013 and qualifying Mendatory Training / Courses according to SO No. 3/2015, secrning two (02) points.
Si Muhammad Nadir Shah	No.	32 <b>6</b> /61	Inv: Ohitral	Recommended for confirmation as St conditionally subject to production of clear ACRs for the years 2011, 2013 and equalifying Mandatory Training / Courses according to SO No. 3/2015, earning two (02) points
9. St. Mihammas Dost	No.	031/14	Dir Upper	Recommended for confirmation as Si conditionally subject to production of crear ACR for the period from 18/08/2013 to 01/12/2013 and qualifying Mandatory Training // Ceuraes according to SO-No. 3/2015, ceircing two (02) points.
10. 3i Anwar Sheed	Vo.	384//	Mr Upper	Recommended for confirmation as \$1 conditionally subject to production of clear ACRs for the years 2013, 2014 and qualifying Mandatory Training / Dourses a conding to SC No. 3/2015, earning two (02) pot: s.
11. St. Wall Mutterhined	15.	337//4	Inv: Dir Lower	Recommended for confirmation as St conditionally subject to product an of pleas WCR for the period from 01/08/2011 to 51/12/2011 and gualifying Mandatory Training / cloumed according to SO No. W2015 earning two (02) points.
12. St. Wahiduliah	Nt.	042/N	Swat	Recomm indext for confirmation as St. condition ifly subject to production of close ACP: for the utaged from 22/05/1013 to 31/10/2013, year 2014 and qualifying dandetory Training to Sr. No. 3/2015, patriling two (02) comes.
13. Si Muhammad gbal	No.	344/13	CTD	Recommunited for confirmation as St conditionally subject a qualifying blackatory trainin; Courses are linding to SC No. 2 2015, earling one (01) point
14. Si Novisherowca	Nr.	368/16	Pin Lovdor	Recommended to confirmation as \$1 conditionally subject to production or older 4.2%. For the years 2013, 2014 and constraining Marchatory Training / Courses according to 50 No. 3/2015, saming two (02) points.
15. 89 Mobaninad Sana	Ma.	34944	f.g.	Recommended for confirmation on \$1 son-theoretic across it qualifying faculating according to \$0 No. 2004(g) carning two 602, counts.
16. 8: Meambackson	No.	308/M	Or Lower 1	Encouragement for confinduation as 31 consequency subject to product ou of clear ACP to for the years 2016, 2014, and qualifying Mandatory Training - Courses according to SC 41 (22013) eording two (02) p.

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46.	S: Sultan Zarin	No. j 5.	2/M	lov: 2	recommended for confirmation as Signature of the years 2010, for the period from 2013/2013 to 31/12/2013, year 2014 and qualifying Mandatory Training / Courses according to SO No. 3/2015, earning two (02) points.
47.	St. Motabar Khan	No. 6	4M r	Chitral	conditionally subject to production of clear ACRs for the period from 18/07/2010 to 31/12/2010, for the year 2011, 2013 period from 01/01/2014 to 29/04/2014 and qualifying Mandatory Francing / Courses necording to SO No. 3/2015, earning two (02) points.
48.	St Gul Fazil	No. 7 1	43/M	The Linear	Recommended for confirmation as Si conditionally subject to production of clear ACPs for the years 2012, 2013, 2014 and qualifying Mandatory Training (Courses according to SO No. 3/2015, earning two (02) points.
.10	SI Hussain Zadu	No.	79/M	Buner	Recommended for confirmation as Si conditionally subject to production of clear ACRs for the years 2013 and 2014.
50	Si Muhamir ad Perviz	No.	97/M	Shangia	Percommended for confirmation as SI conditionally subject to production of clear ACRs for the years 2013, 2014 and qualifying Mandatory Training / Courses according to SO No. 3/2015, earning two (02) points.
51.	SI Badsnish Rahman	No.	123/1/1	PTC Hangu	Recommended for confirmation as 51
52.	SI Habit Seld	No.	131/M	Dir Lower	Recommended for confirmation as Si- conditionally subject to production of clear ACP: for the year 2010 and qualifying Mandatory Training / Courses according to SO No. 3/2015, carning two (02) points.
53.	. Si -Alam Zeb	No.	162/M	PTC Hangu	Recommended for confirmation as Standard conditionally subject to qualifying Mandatory Training / Course: according to 6.0 No. 9/2015, earning two (02) points.
54.	. St Said Noor Shah	No.	351/M	PTC Hangu	Recommended for confirmation as Si.
55	Sl Khaista Muhamma	J No.	430/%	Dir Upper	Recommended for configuration as Si conditionally subject to production of clear ACRs for the years 2010, 2012, 2013, 2014 and qualifying Mandatory Training / Courses according to SO No. 3/2013, coming tyre (02) points.
56	. S: Sher Muhammad	t∳n.	455/M	S6	Re-minnended for confirmation as Si- conditionally subject to production of clear AOR for this year 2011 and qualifying Mandatory Training / Courses according to SO No. 3/2015, spraing two (02) points.
57	. Si Hambyun	No.	458/14	Inv: Shangla	Personmended for confirmation as SI conditionally subject to production of clear ACRs for the period from 05 04/2010 to 31/12/2010, 19/03/2013 to 31/12/2013, year 2014 and qualifying Mandatory Treining / Courses extending to SO No. 3/2018, earning one (01) point.
58	SI Abdyl Wahid	· No.	1465/A1	inv: Chitrel	Recommended for confirmation as SI conditionally subject to qualifying (Rendalory Training / Courses according to SC No. 3/2015, estining two (02) points.

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	59	SI	"enir Shah	No. 47	3/∖1.	iny Dir Lower	Recommended for confirmation as Si conditionally subject to production of clear ACRs for the years 2019 2011, 2013, 2014 and qualifying Mandatory Training / Courses according to SO No. 3/2015, earning two (02) points.
.	60.	Si	Abdur Rahmari	No. 39	5 M .	-Cir Lower	Recommended for confirmation as SI conditionally subject to production of clear ACRs for the years 2013, 2014 and qualifying Mandatory Training / Courses according to SO No. 3/2015, earning two (02) points
	<b>6</b> 3.	31	Zahid Ur Rahman	No. 18	3/14	Dir Lower	Recommended for confirmation as \$1 conditionally subject to production of sich ACRs for the year 2010, for the period from \$1,012011 to 14/04/2011 and qualifying Mandstory Training I Courses according to \$0 No. 3/2015, earning two (92) points.
	62.	31	Aurang Zab	No. 10	1 <b>5</b> /1/A	inv: Swat	Recommended for confirmation at St conditionally subject to qualifying Mangatory Training (Courses according to SC No. 3/2015, earning two (02) points.
	6'i.	SI	Umar Raziq	No 25	SE/IVI	inv: Shangla	Recommended for confirmation as SI conditionally subject to production of clear ACRs for the period from 01/01/2011 to 30/09/2014 and for the year 2014.
	64.	SI	Muhemmad Zeman	No. 2	7 1/1/4	Buner	Recommended for confirmation as Si conditionally subject to qualifying Mandatory Training / Courses according to SO No. 3/2015, saming one (01) point.
i i	<b>6</b> 5.	SI	Aman Khan	No.	MvOi	Inv; Swat	Recommended for confirmation as Si- conditionally subject to production of clear ACRI for the period from 01/10/2013 to 31/12/2013 and qualifying Mandatory Training / Courses according to SO No. 3/2013, saming one (01) point.
	66.	Şi	Rahai Khan	No. 41	52/Ivi	Dir Upper	Recommended for confirmation as SI conditionally subject to production or clear ACRs for the period from 01/01/2013 to 16/07/2013, 2014 and qualifying Mandatory Training / Courses according to SC No. 3/2013, earning two (02) points.
	67.	Si	Fazel Rahim	No. 4	3/1/4	Inv: Chitral	Recommended for confirmation as SI conditionally subject to production of clear ACRs for the years 2013 and 2014.
	68.	SI	Amir Zadą	No. 49	3/14	Inv: Dir Lower	Recommended for confirmation as SI conditionally subject to the completion one year period of posting as OII ain: qualifying idendatory Training / Courses according to SO No. 3/2015, earning one (01) point
	69.	Si	Amir Zeb	No. 50	21 <i>/</i> ħ6	Inv. Swet	Recommended for confirmation as 01 conditionally subject to production of clear ACRs for the period from 01/01/2013 to 23/06/2013 and qualifying Mandatory Training / Courses according to SO No. 3/2015, earning two (02) points.
:	70.	sı	Bakhi Zada	No. 51	)7 <i>1</i> M	Dir Lower	Recommenced for confirmation as Strong unionally subject to the completion one year perion of possing as SHO and production of satisfactory ACRs for the period from 01/08/2012 to 31/12/2012, 2013, 2014 and qualitying Mandatory Training / Courses according to SO No. 3/2015, earning two (02) points.
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72	. Si Muqaddar Ka	an N	a. 510	worl law	Dir sendi		coording to SO No. 3/2015.
7.2			to 52	รับฟ, ∃กง: Q	Reco	mmended fo	r confirmation as SI A to qualifying Mandetory according to SO No. 3/2015.
-	3. Si Mohammad	Riaz	No. 5	M Inv.	Reso	onimended hitionally subjecting / Courses hing one (91) p	or confirmation as State to qualifying Mandatory according to SC No. 3/2015.
7	24. St. Khan Naza	,	Nos. 5	45/M - In	Res con for for pp 91 Mar No	onimended ditionally subjet the years indatory Training 3/2015, earning	lor confirmation as 5; at to production of clear ACRs 2013, 2014 and qualifying g / Courses according to SC g two (02) points.
	75. SI Akhta Ali		No.	50AV		commended nditionally subject the years 201	for commission of clear ACEs and 2014.
	76. St Azizer Re	hman	No.	169AV in	v; Swat 20	t the benoon	for contiments of clear ACRs ect to production of clear ACRs om 20/06/2013 to 31/12/2013, of 20/06/2013 Training / Mandatory Training / mg to SO No. 3/2015, earning
	77. St Barkat K	he:	No,	Sew (			13 and 2014.
•	79. Si Gohar Z	Zaman	No	41FA E	Elite Force	for the period	bject to prose as 33/12/2012 and 16/09/2012 o 31/12/2012 and ndatory. Tr intra 6 Courses O'No. 3/2015, earling two (92)
	79. Si Fazal E	liah:	Nn.	38/M	Elite Force	ecelifying M ecelifying to ecents.	ubject to pri additional property of the prope
	80. S. Arhiad	Alain	No.	85/M	Elite Force	l'experimender accident to pro 1-999/2012 to "raining / Co carning two (f	I for configuration as SI conditionally suction of year ACRs for the nertial 31/12/2011, and quality frances (according to 50 No. 3/2015). It points
	81. Si lioraini	m Kiten	, No	. 550/M	Elif Lower	2013, 2014 Courses accounts, 202) points.	d for eccilimnation as SI conditionally duction of clear ACRs for the years and qualifying Mandatory Training / Juding to SC No. 3/2015, pareing two
4.5	22 S: Abdu	i War de	 Ni:	, 1 551/W	Buner		ed for confirmation as St
		zmmed Karii		. 584vi	Inv: Swat	Subject to pf from 01/01/ Mandatory T 3/1115, cern	d for confirmation as SI conditionally objection of clear ACR for the period 2013 to 23/06/2013 and grafifying raining / Courses according to SO Nt. ing two (02) points.
•	34. S Gulz	ar An, nad		o.) 650/M	Shangla	from 27/03/	ed for confirmation as SI conditionall, odtuvion of slear ACRs for the centure 22/17 to 31/12/0/12/2 22/06/07/3 to 21/12/0/12/2 20/14 and unstring Menderally ourses according to 50 No. 0/2013 (01) points.
	<u> </u>			***************************************			

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35.	ව!	Shak <b>s</b>	d Ahn ad	No.	<b>2</b> 42ЛVI	Swat	Recommended for confirmation as Si- conditionally subject to the completion one year period of posting as SHC and production of satisfactory ACR for the period from B1/01/2013 to 23/05/2013 and qualifying Mandatory Training / Courses according to SO No. 3/2015, earning one (01) point.
36	SI.	Наыю	Shah	No.	<b>2</b> 40/M	Shangle	Recommended for confirmation as Si conditionally subject to production of clear ACRs for the years 20h2, 22/06/2013 to 31/12/2015, 2014 and qualifying Mandatory, Training / Courses according to SO No 3/2015, earning two (02) points.
e2.	sı	Farukt	Sair	No	8964	Випег	Recommended for confirmation as SI conditionally subject to production of clear ACRC for the years 2013 and 2014.
53.	SI.	Muhar	nmac Basha	r No.	35/M	lav: Shengla	Recommended for confirmation as Standard CRs for the period from 19/03/2013 to 31/12/2015. 2014 and qualifying Mandatory Training Courses according to SO No. 3/2015, earning two (02) points.
4.,					1	*******************	

Regional Police Officer, Malakand, at Saidu Sharif Swat

Copy to Provincial Police Officer, Khyber Pakhtunkhwa.

Peshawar for favour of information please.

Regional Police Officer,
Malakand, at Saldu Sharif Swat



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# OFFICE OF THE REGIONAL POLICE OFFICER, MALAKAND REGION. AT SAIDU SHARIF SWAT

#### ORDER:

In compliance of CPO, Peshawar direction issued vide memo: No. 952-58/CPB, dated 22/06/2016, confirmation of SI Muhammad Buzurg Baig, who was confirmed in the rank of Sub Inspector for his posting at Traffic Training School, Peshawar for more than six years by DPC held in this office on 19/01/2016 vide this office memo: No. 755-72/E, dated 25/01/2016 is hereby withdrawn, as according to CPO, Peshawar clarification Traffic Training School is not included in the institution/specified for confirmation as SI.

(AZAD KHAN) TSt, PSP Regional Police Officer, Malakand, at Saidu Sharif Swat

No. 7/1/-12-1E,

-Copy for information and necessary action to the:-

- 1. Provincial Police Officer, Knyber Pakhtunkhwa, Peshawar with reference to CPO, Peshawar memo: No. 952-58/CPB, dated 22/06/2016.
- Deputy Inspector General of Police, Traffic, Khyber Pakhtunkhwa, Peshawar.

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The Competent Authority has taken ar ous note for wrong interpretation of

From:

The Provincial Police Officer, NWFP Peshawar.

ro

- 1. All Dy: Inspectors General of Police in NWFP.
- 2. Commandant PTG/Hangu.
- Asstt:Inspectors General of Police, Traffic & CID.

No /6 521-9°/E-II, Dated Peshawar the

/9/2004/

Subject:

CONFIRMATION IN THE RANK OF S.IS.

Meno:

Please refer to this Office memo: No:9750-60/E-II dated 29/5/2000.

The contents of the DPC held on 23/2/2000 is re-produced below for strict compliance:-

- 1. The DIG of Police, Peshawar Range Peshawar has reported that DPO were constituted to examine the confirmation cases of Offg: SIs due for confirmation in their ranks.
- 2. During the proceeding the SSP Peshawar pointed out that those Offg: SIs who have remained posted to Special Branch and Crimes Branch for a period of One year can be considered for confirmation in their ranks.
- In this connection Police Rules Para-10(2) is reproduced below:-

# POLICE RULES 13.10(2)

"No ASI shall be confirmed in a substantive vacancy in the rank of SI unless he has been tested for at least a year as an Offg SI independent charge of a Police Station in a District other than that in which his Home is situated."

- 4. According to Para-10 of the Minutes of the meeting held in Police Club on 14-8-1977 that those who remained posted at PTC/Hangu for 3 years and also in Special Branch/Crime Branch there should be no bar in their confirmation in the rank of SI. In case, they have not remained posted as SHC the period they of the SI.
- 5. Previously CID was a component of Special Branch therefore, the SIs posted in CID may also be considered for confirmation in their ranks.
- for counting or otherwise for confirmation as SI. Confusion was arised that whether period of CID is also countable towards the confirmation of SI like the period of Special Branch CRIMES

with the observation that is there any bar on posting in CID and further if any amendment in Police Rules is needed then self contained justification may be forwarded for further necessary action.

- Accordingly the DIG of Police, Peshawar Range, Peshawar was informed vide this Office Endst: No: 17041/E-II dated 22-9-4009.
- Now the DIG of Police, Peshawar Range, Peshawar has submitted the following:
  - Clarification was sought on the Minutes of the Police Conference held in Police Club, Peshawar on 14-8-1977 under the Chairmanship of the then Police Ohier.
  - The only issue is that whether period spent on posting in the OID is to be counted equivalent to the posting of SHO of a Police Station or not
    - This decision needs to be taken at the level of IGP as there seems to be no necessity forwarding it to the Home Deptt:
- Me has further requested that the decision in the matter may be taken so that the confirmation cases are not delayed.

This DFC thoroughly examined the case and unsuimously resonmended to be considered the period of posting of SIs who remained posted in CID for a period of 3 years for confirmation as SI like Special Branch Orimes Branch and Training Institutions.

You are requested to keep in mind the requirements under PR 13.10(2) and period of Special Branch, Investigation Unit, CID & Training Institutes, which recommending the cases for list-F.

> (KHURSHID ALAM KHAN) ADDL: IGP/HQRS

FOR PROVINCIAL POLICE OFFICER

N.W.F.P PESHAWAR

Competent Authority has taken for our note for wrong interpretation of the period of Special Branch

To

The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

Sir,

With due respect and most humbly submissions, we all senior most SI,s of Malakand Region, bring into your kind notice, the following irregularities, in imposing standing order No. 10/2009 issued by the then worthy Inspector General of Police Khyber Pakhtunkhwa Peshawar.

- 1. That no SI from Malakand Region was selected for upper college course from the year 2003 to 2009 due to law and order and militancy situation in Malakand Range.
- 2. In the year 2009 the then worthy Inspector General of Police KPK issued standing order No.10, wherein the upper college course was declared mandatory for further promotion as Inspector and age limit for this course was fixed 48 years, while at that time 90% of the SI,s of this region had crossed the age limit of 48 years. There was no concession in this standing order for existing senior most SI,s.
- 3. That we had already made representation in various Police Darbars etc for selection of Upper Course and the then RPO, Malakand made representation to worthy IGP Khyber Pakhtunkhwa Peshawar vide his letter No. 2668/E dated 18.06.2008 (copy attached) for relaxation but the Addl: IGP/Head Quarters Peshawar instead of putting up the case to worthy IGP, made the following remarks on it vide his letter No.17718/EI dated 28.06.2008.

#### (THIS WILL OPEN PANDORA BOX)

- 4. We have not refused to undergo upper college course but not been selected by Regional office Malakand due to critical situation in the region.
- 5. The Regional Office Malakand ignored us for selection of the said course and there was no fault from out behalf.
- 6. In promulgation of this disputed standing order 90% of the senior most/well educated and experienced Sub Inspectors deprived from further promotion.
- 7. Now most junior SI,s to us have been promoted as Inspectors giving the benefit of upper college course and we having no fault on our shoulders are deprived from further promotion. Being disheartened and hopeless most of us have knocked the door of High Court Peshawar and the case is under trial there.

In light of the above narrated facts your merit based command is requested to have a merciful view on our genuine problems by setting aside this partial/disputed standing order and to give us our due right of seniority and promote us as Inspector.

We will pray for your long life and prosperity.

Your most obedient
All senior most Sub Inspectors of Malakand Range



The Provincial Police Officer. Khyber Pakhtunkhwa Peshawar

Sir.

With due respect and most humbly submissions, we all senior most SI,s of Malakand Region, bring into your kind notice, the following irregularities, in imposing standing Order No.10/2009 issued by the then worthy Inspector General of Police Khyber Pakhturkhwa Peshawar.

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We will pray for your long life and prosperity.

Your most obedient All senior most Sub Inspectors of Malakand Range

zrom :

The Regional Police Officer,

Malakand, at Saidu Sharif, Swat.

To

The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar,

No. 1513.

/E, dated Saidu Sharif, the \_\_\_\_\_\_/2014.

Subject:

APPLICATION

Memorandum:

It is submitted that the following Sub-Inspectors has produced application to the undersigned during Police Darbar at Chitral requesting therein that according to their date of birth as noted against each they have become overage for Upper School Course. Since the criteria / eligibility for selection to Upper School Course was confirmed ASIs on list-E having age of 48 years. Therefore, according to their dated of birth as noted against each they become overage for the said course. Resultantly they could not avail the opportunity of further promotion:



CHILISYP A.

S. No	Name and No.	Date of birth
1,	St Wazir Ali Shah No. 359/M	. 10/01/1956
2.	SI Muhammad Nadir Shah No. 325/M	12/03/1956
,1,	St Sultan Zaman Daig No. 146/M	03/03/1958
4.	SI Abdul Payeen No. 394/M	10/10/1956
S.	SI Saidullah No. 385/M	28/03/1960
6.	SI Sardar Ali No. 42/M	. 02/03/1958
7.	SI Mir Fayat 217/M	16/10/1960
8.	SI Muhammad Afsar No. 374/M	11/02/1958
9.	SI Khush Murad No. 397/M	. 01/05/1960
10.	SI Muhammad Nawaz No. 429	• 01/06/1957
11.	Sl Abdul Fatch No. 402	; 09/04/1959
12.	SI Mutabar Khan No. 64/M	13/12/1961
-13.	SI Mansoor Ahmad No. 13/M	06/07/1957
I <sub>2</sub> 1.	SI Iqbal Muhammad No. 441/M	: 04/04/1959
15.	SI Murad Khan No. 407	01/02/1960
16.	SI Mir Azam No. 92/M	03/03/1961
17.	SI Adam Khan No. 401/M	11/02/1954

It may be mentioned that as per table given below a very less numbers of officers have been selected for the Upper School Course, due to lack of eligible officers as well as insurgency in Malakand Region:-

Year		Sanctioned quota	Office	Officers selected		
2007		14		5		
2008	, .	18	' :	6		
2009		18	í	: 10 ·		

It is therefore requested that they may kindly be exempted from Upper School Course or promoted in the Rank of Inspectors on humanitarian grounds and keeping in view their bravery, exceptional devotion to duties during insurgency, please.

No. 15/4 . /E,

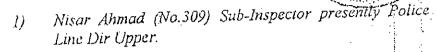
Regional Police Officer, Malakand Ar Saidu Sharif Swat

Copy to District Police Officer, Chitral for information.

CETCHITTE

Regional Police Officer, Malakand, at Saidu Sharif Swat (DARUL OAZA) SWAT.

Writ Petition No. 231-111 of 2013



110000

- Abdul Hayat (No.318) Sub-Inspector presently SHO 2) Police Station Dorsh Chiral.
- Salah-ud-Din No. (326) Sub-Inspector presently Reader 3) to DPO District Chitral.
- Muhammad Nadar Shah No.(335) Sub-Inspector 4) presently Police Station Kalakot Swat.
- Muhammad Mustafa Kamal No. (339) Sub-Inspector 5) presently Wari Dir Upper.
- Sultan Zaman Baig No. (346) Sub-Inspector presently 6) Lowari Tunnel Chitral.
- Mehmood, Khan No. (352) Sub-Inspector presently Tranining Staff Chitral.

Wazir Ali Shah No. (381) Sub-Inspector presently Police Linee Chitral.

- Sultan Baig No. (381) Sub-Inspettor presently SHO Police Station Boni Chitral.
- Saced Ullah No.(385) Sub-Inspector presently Police Line Shangla.
- Muttaber Khan No.(64) Sub-Inspector presently Police Line Chitral.
  - Khosh Murad No. (397) Sub-Inspector presently Police 12) Line District Shangla .
  - Haidar Ghazi No.(85) Sub-Inspector presently SHO 13) Police Station Jaghor Chitral.

Habib ur Rehman No.(19) SUB-INSPECTOR. presently 14) Addl: SHO, Police Station Koghozai Chirtal.

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".O. Asagi

Additional Registrate 8 1 10 4 2013

Wate:30 9000 20 1000

FAX NO. : 70946788612

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- Choki Para Police Lotko Chitral:
- 18) Murad Khan No. (407) Sub-Inspector presently Chowki Damir Arando Chitral.
- Muhammad Raza Khan No. (241) Sub-Inspector presently
  Officer Incharge Police Station Arando Chitral.
- 20) Sardar Wali Khan No.(422) Sub-Inspector presently Officer Incharge Investigation Police Station Drosh Chitral.
- 24) Barkat Shah No.(411) Suh-Inspector presently Police Station Jaghor Chital.
- 22) Muhammad Azam No (409) Sub-Inspector presently Addl: SHO Police Station Arando Chitral.
- 23) Sardar Ali No. (421) Sub-Inspector presently Officers of Company Incharge Investigation Police Station Lotko Chitral.
- 24) Taj ud Din No.(') Sub-Inspector presently Police Line District Upper Dir.
- Sher Wazir No. (133) Sub-Inspector presently Officer Incharge Investigation Police Station Mastooj Chitral.
- 26) Sher Nawaz No. (412) Sub-Inspector presently Police Line Chitral.
- 27) Afzal Nadar No.( ) Sub-Inspector presently Police Line Upper Dir.
- 28) Musharaf Khan No. (90) Sub-Inspector presently AGO Chired Branch Chitral.
- 29) Muhammad Ashruf No.( ) Sub-Inspector presently Police Line District Shangla.
- 30) Mir Azam No.( ) Sub-Inspector presently Police Line District Bunir. Petitioners

Additional Registrar

VERSUS

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ATTESTED

(19)

# WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN, 1973.

(20)

Respectfully Sheweth:

The petitioners submit as under:

- 1) That all the petitioners are bona-fide resident of District Chitral presently scrving in Police Department as Sub-Inspector in different posts in various Police Stations of Malakand Division inentioned in the heading of the writ petition against their names.
- 2) That the petitioners have enlisted as constable and qualified all professional Courses and required exams for promotion during their long tenure of services.
  - That the petitioners being qualified promoted upto the rank of Sub-Inspector in the year 2007-08,09 and 2010 respectively and now all the petitioners are confirmed Sub-Inspectors and most senior Sub-Inspector in District Chitral Police. (Copies of Bio Data of Senior Most Policeits Annexure "A").

FILED TODAY

Additional Resident 2013

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ATTED

Regional Police Officer, Malakand, at Saidu Sharif, Swat addressed the Provincial-Police: Khyber Pakhtunkhwa. Peshawar, wherein the petitioners were recommended for promotion to the rank of Inspectors on humanitarian grounds and keeping in view their bravery, exceptional devotion to duties during insurgency. Learned counsel submitted that he would be satisfied, if the respondents are directed to accelerate the action to be taken referred to above and to dispose of the matter immediately. Learned AAG has got no objection. 5. In wake of the above, the instant petition

being not stressed is disposed of; however, the respondents No. 2 & 3 are directed to consider the request of the Regional Police Officer, Malakand, at Saidu Sharif, Swat made vide letter No. 1513 dated 19.02.214 within one month positively strictly in accordance with law

Announced Dt. 28.03.2014. hate of Presentation of Application 28\_ testa of Completion of Coples\_ la, of Copies, ce Clargett. Date of Delivery of Copies.

Sd. Lal Jan K

Certified to be true cop

Peshawar High Court, Mingeral

Auchorized Uniter himen

ATESTED

Rank, Name	Unit/Distt:	Date of Appoint:	Date of Superannuation	Total period of service	Request of applicant	Date of current posting	Total of courses avail	Date of punishment awarded	Good Entries	Bad Entries	Censure
SI Muhammad	Traffic Management	24.12.1978	2019	40 years	Differ in DPC 2016	11/2017	05				
Buzurg Baig No- M/433	School Kohat	01.02.2002	-02.04.2041	16 years	Transfer to	10.03.2018	05			7.7. <del>-</del> 7.7.	
Hussain D/51	FRP Kohat	27.07.2007	2049	11 years	Region Request for promotion	Nil	03		/		-
HC Arman Ullah No. 4970	FRP Rollar				under S.O No. 02/2014	10.05.2018	Recruit				-
FC Jamal Khan No.	FRP Kohat	22.08.2007	2049.	11 years	Request for transfer to FRP Bannu		Course				<del> </del>
FC Naseem Ullah No.	FRP Kohat.	16.06.207	2046	11 years	Request for transfer to FRP Bannu	10.05.2018	Recruit Course	,.		ļ	<del> </del>
6552 FC Saif Ullah	FRP Kohat	16.06.2007	2044	11 years	Request for transfer to FRP Bannu	10.05.2018	Recruit Course				·
No. 5249 FC	FRP Kohat	16.10.1995	2036	21 years	Request for transfer to	10.05.2018	Recruit Course	-			·
Muhammad Sabir 5167 Ex:FC Amir	Kohat district	30.09.1996	2036	02 years 02	Request for re-	Nil	Recruit Course	(13,11,1998	-	04	
Abbas	•			months	instatement				<u></u>	<u> </u>	

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Date.

FROM:

FAM NO. :09459250049

5 Mar. 2017 10:53Am

Addiness to

FOR PUBLICATION IN THE KHYBER 0943 = 412228 PARKTUNKHWA POLICE GAZETTE PART-II,

Sher muhamul-ORDERS BY THE PREVINCIAL POLICE OFFICER KHYBER PAKHTUNKHWA, PESHAWAR.

## NOTIFICATION

/E-III, PROMOTION AS OFFG: INSPECTORS (EPS-16), Dated: 02/03/2017 1301

As per recommendation of the DPC dated 23.02.2017 duly approved by the  $M_{\rm c}$ Inspector General of Police Khyber Pakhtunkhwa, the following confirmed Sub-Inspectors at included their names in List "F" are hereby promoted as Offg; Inspectors (SPS-16) with immediate of

liş b	mier¦ tir 	CIC BUILDES IN LASS	REGION	RECOMMENDATION  Recognizeded his name for promotion as Offic Inspects Recognized his name for promotion as Offic Inspects Recognized his name for promotion as Offic Inspects Recommended his name for promotion as Offic Inspects
5.1	vO	NAME & NO.		Recommended his mane for promotion as Organia, 1985. In However, according to Standing Order No. 5/2015. In However, according to Manks.
	2.	St Amanutlah No. 1873 31 Imayatullah No. (1870)	· · · · · · · · · · · · · · · · · · ·	However, according to Standing Order No. 3/2015, he have to carn eight (08) marks.  Recommended his name for promotion as Offic Inspector However, according to Standing Order No. 3/2015, he have to carn eight (08) marks.
-	1	St Umer Niez Shah No.: B/26	Banno	Recommended his name for June 19 Property No. 3/2015. In those year, according to Standing Order No. 3/2015. In have to carn eight (08) marks.
	d.	SI Aldior Ali No		However, according to home to the inspector
		SI Taj Ali No. 1879	Band	the vever, he will any of the institution mental mendatory tenare in any of the institution mental mendatory tenare in any of the institution mental standing Order No. 21/2014. Moreover, according Standing Order No. 3/2015, he will have to care circle works.
	6,	13/1/4	Ban	have to earn time (09) marks to be to the thing the performance of the commended his name for promotion as (1912; Inspector to commended his n
,	7	SI Inamullah A 19707	10.1.1	bandatory tenure in any of the institution memory. Standing Order No. 21/2014. Moreover, according Standing Order No. 3/2015, he will have to earn cight marks.
	-	8. St Javed Japa 3/13	1 No B	have to cour four (04) marks:
i	ļ	6. SI Zufarullah No. 13/22	Khan	have to carn six (06) marks.
ş. Ç		10. SI Hamayun 10. 11/12	Raza	Recommended his name for programma as 3/2015. In However, according to Standing Order No. 3/2015. In have to carn tive (0.3) marks.



¥				•			and the second of the second o
					- 11+41 17 <del>79</del> 14.		nmended his name for promotion as Offg: inst
	ť	G. Si	uhammad	Ban	ոս   Լ	Çec∵ii	ver, he will have to complete his one 101;
		201 161	Lindinana 17/17		1	lavic	ver, he will have to complete the mention mention along tenure in any of the institution mention according
	į	Moli	z No. 13/17		١,	nai di	alory tenure in any of the institution
			1		1	:	ing Order No. 21/2014. Moreover, according
	<i>.</i>	١.	ŀ			Stailu	ing Order No. 21/2014. Moteover the ling Order No. 1/2015, he will have to earn the
	1	1	1			Statud	ing Order Day School and
		ļ	ì		1	nga k	numerided his name for promotion as Offg: Inspect
		1			anu	Reco	mineraled his name for promotion as 37.22015
	12.	ISLR	izvanullah	Dat	111111	11	angended his name for promotion as No. 3/2015.
1			13/15		}	110.7	to earn one (01) mark.
1		110.				JEN.C.	noncoded his mark promotion as Offg: Instead
ì	100	1	nicui Asimu	tsa	anu	Re.a	annicided the fauth of Standing Order No. 3/2015.
İ	13.				į	Hew	ever, according to standing
Ì .		No.	B/4			ha æ	to earn seven (07) marks.  mineraled his name, for promotion as Offg: Inspect parameter to Standing Order No. 3/2015, he v
1		1				17.00	appropried his name for promotion as City, 113,45
	14.	157	Abdur Rashid No.	M	ırdan	100-0	ommended his name for promotion as yever, according to Standing Order No. 3/2015, he very control of the standing Order No. 3/2015, he very control of the standard of the sta
1	;4.		7116	1		Hes	yever, according to
Ì		1,,,,,	, ,	}		hs v	onmended his name for promotion as Offg: Inspect-
1_			11	M	ardan	12:c	ounmended his name for promotion as of the sever, according to Standing Order No. 3/2015.
Γ	.15.	SU	Sardar Hussein	'''	E 1 1 1 - 1 - 1	1 13 55	veryer according to buttoned
İ		No	, MK/117	i		1 10 1	e to cara five (05) marks.
- 1		- 1		1		1231.4	commended his name for promotion as Offg: Inspect
<u> </u> _			Zafar Khan No.	Mi	dakand	] R ×	commended his tall the complete his one (0)
- 1	16.			1		Fo	wever, he will have to complete his one (01 mention me
ļ		. \ 26	3/M			lea	ndatory tenure in any of the historical according Order No. 21/2014. Moreover, according Order No. 27/2015 he will have to earn nit
-		` [		1		1"	order No. 21/2014. Moreover, account
;		ì		1		1 5 30	anding Order No. 21/2014. Reference to earn nit
- 1		ì		!		124	inding Order No. 3740
Ì		- 1		1		114	commended his name for promotion as Offg: Inspect
- 1					lakand	11:0	ecommended his name for promotion as Orig. Inspec-
-	17	.   S	] Qibla Alam No	.   1012	ilakana	1:1.	The state of the s
- 4	•		us/M	1		1 3 11	ive to carn seven (07) marks.
.		ĺ	44.1	- }		118	ecommended his name for promotion as Offg: hosper ecommended his name for promotion as Offg: hosper ecommended his name for promotion as Offg: hosper
}			3 Navat Khan	NI:	datand	3	ecommended his name for promounts as a commended his name for promounts of No. 3/2015.
-	1	8. 13	d Markin Kram	1		- 11	owever, according to Standing
	!	1	No. 323/M	į		1	and the curry Chills (1997) and the control of the
	<u>:</u>	1				† ii	recommended his name for pronuntary No. 3/2015.
		10.	Si Salah-ud-Din	i v.	latakaust		
	1		No. 326/M	ì			neve to care eight (08) marks. L
	1 .	1	140. 524	- 1			Recommended his name for promotion as Offg: Inspective Accommended his name for promotion as Offg: Inspection to Standing Order No. 3/2015.
	<b>-</b>		SI Wahidullah N	,   N	lalakend	l'i	Recommended his name for promotion as 51, 3/2015.
		20.		.   *		ĭ	lowever, according to
		ì	342/M	- [			have to earn nine (09) marks.  Recommended his name for promotion as Offg: Inspec.  Recommended his name for promotion as Offg: Inspec.
•	1	- 1	·			<del>-</del> -	Becommended his name for promodoli as 3/2015.
	\ <del></del>		SI Muhammad		dalakan		
	1	21.	lybal No. 344/N	1 İ		. !	have to earn six (06) marks.
	1	į	Most Mo. 24-11			1	have to earn six (vo) many for proposition as Offg: Inspiger
	-		\		MalaRa		have to earn six (06) marks.  Recommended his name for promotion as Ong. Inspired his name for promotion as Ong. Inspired
	<u> </u>	22.	St Nowsherawa	រោ	A ITH GIVEN	. 62.00	Hawever, accuraing w
	1		No. 348/M	ļ		ļ	have to earn seven (07) marks.
	l		1	1		1	have to earn seven (07) marks.  Recommended his name for promotion as Offg: Inspection to Standing Order No. 3/2015.
	\		100 84 1		Malaka	nd	Recommended his name for promotion to Recommended his name for promotion to Standing Order No. 3/2015.  However, according to Standing Order No. 3/2015.
	ļ	2.3.	SI Muhammad	,			However, according to
	١.		Essu No. 349/F	v1		•	Lieuve to cam six (or) management of the corne insper
•							Recommended his name for promotion No. 3/2015.
•	\	24.	SI Moumbar K	han	Malaka	1111	
	- 1		No. 366/M				have to earn seven (07) marks.
	Į		1310	'	\ 		The transfer bis name for promotion as Originished
	1		SI Bilazar Kh		Malaki	ind	have to earn seven (07) marks.  Recommended his name for promotion as Offg: Inspecting to Standing Order No. 3/2015.
	\	25.	St Bitazar Kir	u14	1		Thomself, accounting the
	1	:	No. 375/M		1	·•·	have to earn nine (09) marks. 4 2
	1		1				Recommended his name for promotion as Offg. Insper Recommended his name for promotion as Offg. Insper
	ļ		Si Arif-ur-Ra	innan	Muluk	มกน	
•		26.	No. 376/M		ļ		have to earn seven (07) marks.
	. [	٠	140. 5707.14		Į.		have to earn seven (8-7)
	_						





5 Mar.

	,	SI Sultan Baig: N	o. Molakand	•
	V	381/M		
•	7	.		
	/ 28.			
. /	/ 40.	SI Karimullah No 391/M	Malakand	
Ι.	Ĺ <u> </u>		-	-
'	29.	SI Sher Gul No.	- Malakand	1
		128/M		
	30.	St Lat Said Shah		1
i	••••	No. 270/Ni	Malakand	
				1
	√31.	SI Muhammad	Malakand	1
Ì		Raza No. 241/M	-	Į
1	. 32.	SI Pinin Nawaz	Malakand	i.
		No. 1447M	Dimanilari	,
-				[
1	33.	SI Muhammad Ayub No. 178/M	Malakand	
_				1
	34.	St Mulanumad	Malakand	1
		Rahman No. 138/M		1
	35,	SI Mir Fayat No.	Nau I de	1
		217/M	Malakand	I
	•			11
İ	•			S
	•	,	1	5
-	36.	St Yousuf Khan	Malakund	2
!	- 1	No. 230/M		il
	37.	SI Amir Rehman	X	15
	- '	No. 444/M	Mulakand	ξ H
	38.	SI MARINI WITE ST		ίŋ
	. ****	SI Malak Zada No. 427/M	Managand	R
ļ	39,			4
	~	SI Khush Murad No. 397/M	Malakand	R
_		<b></b>		ii h
l	40.	51 Feroz Khan No.	Malakand	R
	{	400/M		H
-	41.	SI Bakht Zamin	Malakand	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
	!	No. 435/M	ייזימאגמנוט	t L
	! ق مو	ا المحادث بالرياض (وموليمين)		ī
	13.72	and the second		
÷.	W. H.		1	100
	1		Carrie Live I	2

Recommended his name for promotion as Offg: Inspector. However, he will have to complete his one (01) mundatory tenure in any of the institution mentioned Standing Order No. 21/2014. Morcover, according Standing Order No. 3/2015, he will have to earn seven Recommended his name for promotion as Offg: Inspector.

However, according to Standing Order No. 3/2015, he have to carn eight (08) marks. . . .

Recommended his name for promotion as Offg: Inspector. However, according to Standing Order No. 3/2015, he have to earn five (05) marks.

Recommended his name for primation or Offg: Inspector, However, according to Standing Order No. 3/2015, he have to earn six (06) marks.

Recommended his name for promotion as Offg: Inspector. However, according to Standing Order No. 3/2015, he have to earn nine (09) marks.

Recommended his name for promotion as Orig: Inspector However, according to Standing Order No. 3/2015, he have to earn nine (09) marks.

Recommended his name for promotion as Offg: Inspector However, according to Standing Order No. 3/2015, he have to earn seven (07) marks, pr. (3

Recommended his name for promotion as Offg: Inspector However, according to Standing Order No. 3/2015, he have to earn nine (09) marks.

Recommended his name for promotion as Offg: Inspector. lowever, he will have to complete his one (01) mandatory tenure in any of the institution mentioner Standing Order No. 21/2014. Moreover, according Standing Order No. 3/2015, he will have to earn seven

Recommended his name for promotion as Offg: Inspector. lowever, according to Standing Order No. 3/2015, he will ecommended his name for promotion as Offg; inspector. lowever, according to Standing Order No. 3/2015, he will ave to carn seven (07) marks.

Recommended his name for promotion as Offg: Inspector. lowever, according to Standing Order No. 3/2015, he have to earn seven (07) marks.

Recommended his name for promotion as Offg: Inspecter lowever, according to Standing Order No. 3/2015, is ave to earn five (05) marks. An

Recommended his name for promotion as Offg: inspector. lowever, according to Standing Order No. 3/2015, he have to earn six (06) marks, to the second

ecommended his name for promotion as Of gransport lowever, he will have to fee them his one (61)

minutes for the serve for promotion as Offic Inspector. secretary secondary to Standing Order No. 3/2015. he सह के द्वारा क्षेत्री (तिहै) marks.







FAX NO. :09459252049

FROM:

	&1 Mulaummad	Malakano	Recommended his name for promotion as Offg. Inspector.
•	Paroug No. 416/M		However, he will have to complete his one (01) yes
	Throughton Than		mar fatory tenure in any of the institution mentioned :
	İ	ļ	Starding Order No. 21/2014, Moreover, according
	1		Startling Order No. 3/2015, he will have to earn seven (0)
	1	ļ	
، سربيم		<del></del>	Recommended his name for promotion as Offg: Inspector.
्र १ वर्षः	SI Fazal Rahman	Malakand	Recommended his name to promotion as Organisation
' /	No. 15/M	į	However, according to Standing Order No. 3/2015, he will
1		·	have to earn nine (09) marks.
<b>√</b> 45.	SI Abdul Kabir	Malakand	Recommended his name for promotion as Offg: Inspector.
•	No. 16/M		However, according to Standing Order No. 3/2015, he will
ļ	.,,		have to cara eight (08) marks.
નું નું	St Shah Khalid	Malakand	Recommended his name for promotion as Offic Inspector.
40,	: 1	141011111111111111111111111111111111111	However, according to Standing Order No. 3/2015, he will
İ	No. 18/M		hav: to carn seven (07) marks.
a 1 m	1	A.C. Island	Recommended his name for promotion as Offg: Inspector.
47.	St Nasceb Jan No.	Malakand	However, according to Standing Order No. 3/2015, he was
	20/M .	•	Flowever, according to standing creek two systems
ļ	.] _, ,,		have to earn seven (07) marks.
48.	St Shanaroz Khan	Malakand	Recommended his name for promotion as Offg: Inspector.
1	No. 38/M		Ho vever, according to Standing Order No. 3/2015, he w
1.			hin's to carn seven (07) marks.
49.	St Gul Zamin No.	Mulakand	Recommended his name for promotion as Offg: Inspector.
	44/M		Ho vever, according to Standing Order No. 3/2015, he was
	1		have to corn eight (08) marks.
·	Si Sultan Zario	Malakand	Recommended his name for promotion as Offg: Inspector,
· 50.		wanakano	However, according to Standing Order No. 3/2015, he w
	No. 52/M		
l	- <del> </del>		have to earn five (05) marks.
/\ 51.	SI Motabar Khan	Malakand	Recommended his name for promotion as Offg: Inspect-
1	No. 64/M		He wever, according to Standing Order No. 3/2015, he w
			have to earn seven (07) marks.
52	SI Gul Fazil No.	Malakand	Recommended his name for promotion as Offg: Inspector.
İ	145/M		However, he will have to complete his one (01) y
1		1	mendatory tenure in any of the institution mentioned
		1	Standing Order No. 21/2014. Moreover, according
Ì		1	Standing Order No. 3/2015, he will have to earn seven (
1			man and the second seco
53.	St Hussain Zada	Malakand	Recommended his name for promotion as Offg: (aspector
	No. 79/M		However, according to Standing Order No. 3/2015, lie gen
			have to earn seven (07) marks.
54	CI Markananad	Malakand	Recommended his name for promotion as Offg: Inspector.
.54.		Manakand	The wever, according to Standing Order No. 3/2015, he
1 .	Perviz No. 97/M		(B. Wever, according to attaining Order 150, Mayto, he
		<u> </u>	have to earn seven (07) marks.
55.	St Badshah	Malakand	Recommended his name for promotion as Offg: Inspector.
.	Rahman No.		However, according to Standing Order No. 3/2015, he
-	123/M	<u> </u>	have to earn seven (07) marks.
56.		Malakand	Recommended his name for promotion as Offg: Inspector.
1	131/M	-	However, according to Standing Order No. 3/2015, he
1.		ļ	be ve to com seven (07) marks.
57.	SI Alam Zeb No.	Malakand	R commended his name for promotion as Offg: Inspector.
37.	162/M	, industries	However, according to Standing Order No. 3/2015, he
	1.041141		Livere to energy sevent (07) marks. • •
		Adada and	Recommended his name for promotion as Offg: Inspector.
58		Mulakand	However, according to Standing Order No. 3/2015, he
	No. 351/M	'	Five to carn seven (07) marks.
ļ			THEO TO CART SEVERY MALE BRIDGE



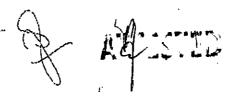


FROM :

FAX ND. :09459250049

5 Mar. 2017 11:03A.

		Cl Ch. C.		
		/SI Khaista	Malailand	Recommended big ways 6
•		Muhammad No. 430/M	i _	Recommended his name for promotion as Offg: Inspector.
		4.11/1/1/	200	However, he will have to complete his one (01) y
		į		mandatory tenure in any of the institution mentioned Standing Order No. 21/2014
				Standing Order No. 21/2014. Moreover, according
				Standing Order No. 3/2015, he will have to earn seven (
	,	60. SI Sher	Malak md	Daniel N.
	- /	Muhammad No.		Recommended his name for promotion as Offg: Inspector.
	//······	455/M		However, according to Standing Order No. 3/2015, he have to yarn six (06) marks
.1	// '	51. St Hamayun No.	Malakand	have to carn six (06) marks.
II	′	. 458/M		Recommended his name for promotion as Offg: Inspector
/!	<u></u>	2. Sl Abdul Walser		However, according to Standing Order No. 3/2015, he, have to earn eight (08) marks
•	w .	I am a constant to diffici	Malaki, kl	have to earn eight (08) marks.
į	1)0	No. 465/M		Recommended his name for promotion as Offg: Inspector. However, according to Standing Contents.
1	4	3. St Table Shub XI	1	However, according to Standing Order No. 3/2015, he have to cam eight (08) marks
;	ľ	1 21 Turk Offall 190.	Maluka id	have to carn eight (08) marks.
	.	473/M		Recommended his name for promotion as Offg: Inspector, However, according to Standing Orders 1
	-		11	However, according to Standing Order No. 3/2015, he have to earn seven (07) marks
	G-2	A COMMITTEE IN THE PERSON OF T	Malaka d 1	have to carn seven (07) marks.
		NO. 395/M	111111111111111111111111111111111111111	cocommenced by pages for
	].		{ L	lowever, he will have to complete his one (01)
	1		<u>n</u>	nandatory tenure in any of the institution mentioned
			3	tanding Order No. 21/2014. Moreover, according
i		_	18	tanding Order No. 3/2015, he will have to carn seven
	65.	St Zahid-ur-	<u> </u>	parks.
		Rahnian No.	Malakum R	ecommended his name for premotion as Offg: Inspector
		183/M	11	owever, according to Standing Order No. 3/2015, he
	00.		7-1-10 <u>111</u>	ive to carn seven (07) marks. Order/No. 3/2015, he
		155/M		Commended his name. See
•	İ			
i	67.	St Umar Raziq No. N	hu hu	we to carn eight (08) marks.
1 1	İ	256/M	Talakund   Re	Commended big many C
.			He	nvever, according to Standing Order No. 3/2015, be ve to carn six (06) marks.
	68.	SI Muhammad M	har	ve to earn six (06) marks.
		Zamun No. 274/M	atakand   Re	commended his name for a
į	_		Ho	wever, according to Standing Order No. 3/2015, he
[	69.	SI Aman Khan No. M.	hay	to earn six (06) marks.
	-	210/M	alakand Red	Commended his page Com
j		-:0:,01	Ho	wever, according to Stand
ľ	70.	SI Robot Ice		wever, according to Standing Order No. 3/2015, he to earn seven (07) marks.
- 1	٠٠.	SI Rahat Khan No. Ma	llakand Rec	Ommended his way 6
		482/M	Hov	ommended his name for promotion as Offg: Inspecto
1			man	vever, he will have to complete his one (01)
[	ł		* Sinn	datory tenure in any of the institution mention
1	İ		Sim	ding Order No. 21/2014. Moreover, according Order No. 3/2015 the method of the order No. 3/2015 the method of the order No. 3/2015 the method of the order No. 3/2015 the method of the order No. 3/2015 the method of the order No. 3/2015 the method of the order No. 3/2015 the order N
}	<del></del>	17.1	muel	ding Order No. 3/2015, 'he will have to earn nin
-	71.	SI Fazal Rabim Ma	akand Reco	13.
- 1	i	No. 486/M		numended his name for promotion as Offg: Inspecti
.	<del></del>  -		. 50W	ever, necording to Standing Order No. 3/2015, h to earn six (06) marks
١ }	72.	SI Amir Zada No.   Mal	akand Reco	to carn six (06) marks.
- 1	1	493/M		immended his name for promotion as Offg: Inspects
-  -	73.		ingwe	ever, according to Standing Order No. 3/2015, h
- 1	,	St Amir Zeb No.   Mula	ikund Recoi	to carn six (06) marks.
- 1	:	501/ivi		Illiended his many s
<u> </u>			Trowe	ever, according to Standing Order No. 3/2015. 1
			i nave i	o carn six (06) marks.
		•		The state of the s



5 Mar. 2017 11:04<u>8</u>

FAX NO. :09459250049

FROM	:		

		SI Hakhi Zada No.	Mularand	Recommended the state of the state of
		SOWM		Recommended his name for promotion as Offg: Inspectitions over the will have to complete his one (01)
	•		<b>+</b>	1 """ to the inelitation court is
,			·	The state of the s
	<u>.</u>	_		Thursday Creat No. 3/2015, he will have to earn him.
	/ 75.	SI Muqaddar Khun	Malak md	THE INC.
ı	/	No. 510/M	Transfer and	Recommended his name for promotion as Offg: Inspector
/			į	However, according to Standing Order No. 3/2015, he have to carn six (06) marks.
	76,		Malak md	Recommended his name for promotion as Offg: Inspector
	~	526/M	1	However, according to Standing Order No. 3/2015, he
- 1	1/5			arve to earn cight (05) marks
	77.	· · · · · · · · · · · · · · · · · · ·	Malakand	Recommended his name for promotion as Office Incomplete
		Riaz No. 531/M	1	Thorover, becoming to Standing Order No. 3/2014 has
-	78.	St Khan Nazar No.	-	1 move to carn seven (07) marks.
	70.	545/M	Malasand	Recommended his name for promotion as Office Inspector
- 1	•	273/1VI	į .	Plowever, according to Standing Order No. 3/2015 he
	79.	SI Aziz-ur-	Malaki nd	maye to earn four (04) marks.
ì		Rahman No.	masak: na	Recommended his name for promotion as Offg. Inspector
	<b></b>	169/M		However, according to Standing Order No. 3/2015, he have to earn seven (07) marks:
-	80,	St Darket Khan	Mulakend	Recommended his name for promotion as Offg: Inspector
-		No. 99/M	ĺ	However, according to Standing Order No. 3/2015, ho
-				have to care five (05) marks.
	ş1.	St Nijud Klaur No. 119/M	Malakand	Recommended his name for promotion as Offer Inspection
-		1134164	_	1 However, according to Standing Order No. 3/2015, he
	82.	SI Gohar Zaman	Malaka id	have to earn seven (07) marks.
		No. 41/M	terdinasti 10	Recommended his name for promotion as Offg: Inspector
		ļ		However, according to Standing Order No. 3/2015. he have to earn three (03) marks:
į	83.	SI Fazal Elahi No.	Malaka .d	Recommended his name for promotion as Offg: Inspector
1	•	38/M		However, according to Standing Order No. 3/2015. he
-	5) 4	<del> </del>	· · · · · · · · · · · · · · · · · · ·	have to earn six (06) marks.
1	84.	SI Amjad Alam No. 85/M	Malakand	Recommended his name for promotion as Offg: Inspector
		140. 934141		Plowever, according to Standing Order No. 3/2015 by
-	85.	SI Ibrahim Khan	Mulakard	have to earn four (04) marks.
		No. 550/M	Manusti d	Recommended his name for promotion as Offg: Insp-
				However, he will have to complete his one (0) mandatory tenure in any of the institution medicion.
١.				Standing Order No. 21/2014. Moreover, according
	•	,		Standing Order No. 3/2015, he will have to earn pine
ļ	<del></del>			marks 🔪 🗦 ,
Ì	86.	SI Abdul Wakeel No. 551/M	Malaka d	Recommended his name for promotion as Offg: Insp-
		190. 351/Ni		Proveder, he will have to complete his one (01)
İ		*		mandatory tenure in any of the institution mention
	į	.		Standing Order No. 21/2014. Moreover, according
L.			i	Standing Order, No. 3/2015, he will have to earn three marks.
Γ	87.	SI Muhammad	Malukand	Recommended his name for promotion as Offg: Inspector
	<u> </u>	Karim No. 58/M		However, according to Standing Order No. 3/2015, he
				have to carn six (06) marks. x 4 m
	88.	SI Gulzar Ahmad	Malakan	Recommended his name for promotion as Offg: Inspecto
	•	No. 556/M		However, according to Standing Order No. 3/2015 to
<u> </u>	89.	Cl Chala Lili		have to earn six (06) marks. (17)
	oy.	Si Shakeel Ahmad No. 242/M	Malakane	Recommended his name for promotion as Offg: Inspecto
ĺ		THE ETHIN	Ì	However, according to Standing Order No. 3/2015, he
				have to earn five (05) marks.



ATTISTED





FROM:

FAX NO. :09459250049

5 Mar. 2017 12:27

		SI Habib Shah No. 340/M	Malakan	Recommended his name for promotion as Offg: Inspector. However, according to Standing Order No. 3/2015, he see have to earn four (04) marks.
,	/	SI Farukh Sair No. 189/M	Malakand *	Recommended his name for promotion as Offg: Inspect However, he will have to complete his one (01) ye mandatory tenure in any of the Institution mentioned in Standi Order No. 21/2014, Moreover, according to Standing Order 3 3/2015, he will have to care six (06) marks.
	92.	SI Muhammad Bashar No. 35/M	Mulakand	Recommended his name for promotion as Offg: Inspector. However, according to Standing Order No. 3/2015, he whave to carn seven (07) marks.
ı	St Legal	. <u></u>		
	93.	SI Legal Sher   Molisin-ul-Mulk No.   499/M	Malal and	Recommended his name for promotion as Offg: Inspector.

Sd/SYED AKITTAR ALI SHAH
Addl: IGP/HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. 1322-34 /E-111

i.

Copy of above is forwarded for information to the:-

Addl: Inspect Telegral of Police, HQrs: Khyber Pakhtunkhwa Peshawar

ii. Deputy Inspector General of Police, HQrs: Khyber Pakhtunkhwa Peshaw

iii. Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar.

iv. Regional Police Officers, Mardan, Malakand, Bannu & D.I.Khan Regions

v. PSO to Worthy Inspector General of Police, Khyber Pakhtunkhwa. vi. PRO to Worthy Inspector General of Police, Khyber Pakhtunkhwa.

vil. Registrar CPO, Peshawar.

viii. Office Supdt: Secret CPO, Peshawar,

ia. Office Supde: E-H CPO Poshawar.

x. Office Supdy: CPB Branch CPO, Peshawar.

[NA]EEB-UR-REHMAN BUGVI:
AIG/Establishment,
For Inspector General of Police
Khyber Pakhtunkhwa,

Peshawar

ATASTED







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Dated: 22 / 3 (2017)
Phi/ 091-9210345/9210239

#### ORDER

The competent authority has been pleased to approve the transfers/postings of the following Inspectors to the Regio (s/Units noted against them with immediate effect):

5.No.   Name  1   Umar Nier No. B/26	From	+ TO
1 2 Payed Iskal No. B/26	Special Bra	nch   Bannu
	E'ite Forc	Bannu
	Elite Force	
		MARIAN
Partition Minus 12 Min B	/17 Bannu	D.I.Khan
A TOTAL TOTA	Bannu	F.R.P. Bannu
102 100 11-00-DI3 NO 326	Malakand	Del.Khan
	Malakand	
- Indiantinas Ignai No 3/4	СТО	C.T.D
The state of the s	Malakand	C.T.D
Sher Gui No. 128		Mardan
12 Lai Said Shan No. 270/M	C70	Traffic Worden
Finn Nawat No. 144	Malakand	C.T.D
Muhammad Raza No Das	PTS Swat	PTC Hangu
TWUDSMMAS AVED NO 12	Malakanu	CPO Investaigation
- vusa: Khan No. 730	Malakand	F.R. P Peshewar
Amir Rehman No. 434	- Malakarn	Kohai
Anush Murad No. 307	Maiatend	CPO Investigation
rero: Khan No 45C/M	viaia cang	CT.D
Barket Sheh Vo 411	idalakand	C.T.0
Shan Khalid No 18	Malakand	CTO
Shamroz Khan No. 30//	Maakard	Trainc Warden
Contract Carin No. 57/M		C.T.D
Wotabar Khan No. 84 /na	Malakand	
- Viunammad Parves No oz	Malakand	C.T.O
Tarinayun No. 458/A4	—i√alakand	CTO
ADOUI Wahid No. 155	Malakand	6annu
12011 Shah No. 422	Malakand	C,T,D
4dfild ur Rehman h	Malakand	Bannu
''VIDIDIAN NO AREA "-	Malakand	C.T.D
	Ma-akand	Kchat
	Malakend	CPO Investigation
33 Amir Zada No. 493	Malakand	D.i.Khan
34 Amir 7eh W	- Ivalakand	D.I.Khan
34 Amir Zeb No. 501/M	Malakand	
35 Muqadar Khan No. 510	Malakand	Traffic Warden
35 Ihsanuliah Khan No 526	i Malakane 1	Elite Force
37 Muhammad Riaz No. 531	Ma'akand	PTC Hangu
38 Aziz ur Rehman No. 169 Nejat Khan	Malakand 1"	CCP, Pesnawar
40 Amiad Alam	. Malakand	Traffic
41. joranim Khasai	Elite Force	Traffic Warden
42 Muhammada No. 550/M	Elite Force	Elite Force
	D.I.Khar	Traffic Warden
Sher Mohsinul Mulk(Legal)  8 akht Zada Na	Malekand	Veshawar
Bakht Zada No. 507/M	Malakand	PTC Hangu
	Bannu	Malakand
The same of the sa		*RP Malakand
	<u>-</u> <u>-</u> <u>-</u> <u>-</u>	ompassionate grounds
with authority of the page		A An (12

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Sd/.



#### ADDL: INSPECTOR GENERAL OF POLICE Headquarters, Khyber Pakhtunkhwa, Central Police Office, Peshawar

No\_\_\_\_\_/Estt-II Dated: 22/3/2017

### **ORDER**

The competent authority has been pleased to approve the transfers/postings of the following Inspectors to the Regional's/Units noted against them with immediate effect:-

S. No.	Name	From	То
1.	Umar Niaz No. B/26	Special branch	Bannu
2.	Javed Iqbal No. B/13	Elite Force	Bannu
3.	Zafar Ullah No. B/22	Elite Force	Bannu
4.	Hamayun Raza No. B/12	Bannu	D.I Khan
5.	Muhammad Muhafiz No. B/17	Bannu	FRP Bannu
6.	Imran Aslam No. B/a	Bannu	DI Khan
7.	Salah Ud Din No. 326	Malakand	C.T.D
8.	Waheed Ullah No. 342	Malakand	C.T.D
9.	Muhammad Iqbal No. 344	CTD	C.T.D
10.	Nowsherwan No. 348	Malakand	Mardan )
11.	Sher Gul No. 128	CTD	Traffic Warden
12.	Lal Said Shah No. 270/M	Malakand	C.T.D
13.	Pinn Nawaz No. 144	PTS Swat	PTC Hangu
14.	Muhammad Raza Khan No. 241	Malakand	C.T.D

No.842-57/B-II Dated Peshawar the 22/3/2017.

NECNAScaecu

P. 2.

No. 8 42 - 57 /11-11 Dated Peshawar, the

/B/2018.

Copy of above is legy arded for information & necessary action to:-

- 1. The Addi: Inspector General of Police, Hqrs., K.P.Peshawar.
- 2. The Addl: Inspector General of Police, S.B. Peshawar,
- 3. The Addi: Inspezior General of Police, Elite Force, Peshawar.
- 4. The Dy: Inspect of Cleneral of Police, F.R., P Peshawar.
- 5. The Capital City Police Officer, Peshawar.
- 6. All Regional Police Officer, K.P.
- 7. The Deputy Inspector General of Police, CTD, KP Peshawar,
- 8. The Sr. Supdit of Police, Traffic, Peshawar. .
- 9. The Supdi: Secret Branch, CPO, Poshawar.

10, U.O.P Files,

Ceem i Psp

D.I.B. HORS

FOR Inspector General of Police, Khyber Pakhtuakhwa, Peshawar.

By pace

1. 29-3= 1017SP/CTD, SP/Elite, principal PTS Swall

for Information and machine

please

MAN

Legional Police Officer, A alakand at Saidu Sharif, Swat.

28/3/2017

ESTED for neaction Al

District Police Officer
CHITRAL
28/03/17



The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 1.7.2016 WHEREBY MY CONFIRMATION ORDER TO THE RANK OF SUB INSPECTOR HAS BEEN WITHDRAWN

Respected Sir,

With due respect it is stated that I was joined your good self Department as Constable at Malakand Region. During service I was promoted to the Ranks of Head Constable and Assistant Sub Inspector and where after I was promoted to the Rank of Officiating Sub Inspector and was confirmed in the Rank of Sub Inspector on the proper recommendation of Departmental Promotion Committee vide order dated 25.1.2016. That accordingly my name was brought into list"E. Later on my confirmation order in the Rank of Sub Inspector has been withdrawn without any solid reason vide impugned order dated 1.7.2016. That it is pertinent to mention that according to the circular dated 11.9.2004 the period spent in training institutes including traffic training school be counted towards confirmation as Sub Inspector but inspite of that the concerned authority withdrawn the order of my confirmation. All the S.I's of Malakand Region including me were not selected for upper college course during the year 2003 to 2009 due to law and order situation in Malakand Region. Later on in the year 2009 the concerned authority issued standing order whereby upper college course was declared mandatory for confirmation and further promotion. That my colleagues feeing aggrieved filed writ petition No.231-M/2013 before the Peshawar High Court Dar Ul Qaza Bench swat and vide judgment dated 28.3.2014 the same was disposed of with the direction to decide the Departmental appeal of the petitioners within a period of 30 days and all those S.I's who filed above mentioned writ petition were promoted to the Rank of Inspector (BPS-16) on officiating basis without the condition of upper college Course vide Notification dated 2.3.2017 but I was ignored on the reason that unless and until my withdrawal order regarding confirmation in the Rank of Sub Inspector is not being set aside.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 01.07.2016 may very kindly be set aside and my confirmation order dated 25.01.2016 to rank of Sub Inspector may be restored. Any other remedy which your good self deems fit that may also be awarded in my favor.

Dated: 7.5.2019

Your Obediently

MUHAMMAD BUZURG BAIG Sub Inspector (Officiating) Traffic Management School, Kohat

1	<u>VAKALATNAMA</u>
B	fore the KP Service Tribunal, Perhawas
·	OF 2019
	Muh ammad Bugurg Bayg (PLAINTIFF) (PETITIONER)
	<u>VERSUS</u>
	Police Department (RESPONDENT) (DEFENDANT)
	Do hereby appoint and constitute NOOR MOHAMMAD KHATTAK, Advocate, Peshawar to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.
	Dated/2019  CLIENT  ACCEPTED  NOOR MOHAMMAD KHATTAK
	SHAHZULLAH KHAN YOUSAFZAI  ** MIR ZAMAN SAFI ADVOCATES

OFFICE:

Flat No.3, Upper Floor, Islamia Club Building, Khyber Bazar, Peshawar City. Phone: 091-2211391

Mobile No.**0345-9383141** 

Refore the Object pellhtunkhur Service Instinal
perhavor Appeal alo. 1160/2019. Mr. Muhamed Busung-Bays VS prince Depti. Application for the grant of function few days for the Submission of Court and process RIShewell Hespertfully Sir, 1) Thet the abovementioned case of the applicat is pending adjudication before their Hagart Tristenel and Set for reply laday delit. U1/7/2020. 2) that the appellant couldn't Insmit court and proum fee due to unovindable execumitance. 3) That the appellant be granted firster few days for behnimin of the court and proces fee. It is Herefore, That on suplance of this Haplication The appellant berry very Rindly be granted few days for the Submission of court and proces fee. Applicant Muhamuad Buzung Bais police Dopti ( Suzung) Dated 14/7/2020