Service Appeal No. 1660/2013

03.12.2018

Nether appellant nor her counsel present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Notice be issued to appellant and her counsel for attendance and arguments for 23.01.2019 before D.B.

> (Ahmad Hassan) Member

(Muhammad Amin Khan Kundi) Member

23.01.2019

None present on behalf of the appellant. Mr. Kabirullah Khattak, Additional AG for the respondents present. Notice be issued to appellant and his counsel for attendance and arguments for 29.03.2019 before D.B.

(HUS SAIN SHAH) MEMBER

(MUHAMMAD AMIN KHAN KUNDI) MEMBER

Chairman

29.03.2019

Nemo for appellant. Addl. AG for the respondents present.

On 17.10.2018, 08.12.2018 and 23.01.2019, the appellant remained un-represented and hearing was, therefore, adjourned on all the three dates while on the last date of hearing the office was required to issue notices to the appellant as well as his learned counsel for proceedings today. The record suggests that the appellant was sent the requisite notices, despite he is • unrepresented today while the case has been called several times. It is already past 3.00 P.M.

Dismissed for non-prosecution. File be consigned to the record room.

Member

<u>ANNOUNCED</u> 29.03.2019 25.04.2018

Counsel for the appellant and Addl: AG for respondents present. Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for same on 11.07.2018 before D.B

11.07.2018

Clerk to counsel for the appellant and Mr. Muhammad Jan, Learned Deputy District Attorney present. Due to general strike of the bar, the case is adjourned. To come up on 21.08.2018 before D.B.

(Ahmad Hassan) Member

Muhammad Hamid Mughal) Member

Reades

21-8-2018 Dire to Eid-11-Asha Vocation the case is adjurned to 12/0,2012

17.10.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Kabirullah Khattak learned Additional Advocate General for the respondent present. Adjourned. To come up for arguments on 03.12.2018 before D.B.



Member

Service Appeal No. 1660/2013

10.10.2017

Junior counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Muhammad Farooq, Inspector (legal) for the respondents present. Junior counsel for appellant seeks adjournment on the ground that learned senior counsel for the appellant is not available today. Junior counsel for the appellant is also directed to submit Member copy of the present case on or before the next date. Adjourn. To come up for arguments on **36**.12.2017 before D.B.

M

(Muhammad Amin Khan Kundi) Member

(Muhammad Hamid Mughal) Member

28.12.2017

Counsel for the appellant and Addl: AG alongwith Mr. M. Farooq Khan, Inspector for respondents present. Arguments could not be heard due to incomplete bench. Adjourned. To come up for arguments on 21.02.2018 before D.B.

Membra

21.02.2018

Due to non availability of D.B. Adjourned. To come up on 25.04.2018 before D.B.

Khan) (Gul Ze Member

50.00

17.05.2017 Appellant alongwith his counsel present. Mr. Asghar Ali. Head Constable with Mr. Kabirullah Khattak, Assistant AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 28.07.2017 before D.B. (MUHAMMAD AMIN KHAN KUNDI) (GUL/ZEB KHAN) MEMBER MEMBER 28.07.2017 Appellant with counsel and Mr. Ziaullah, Deputy District Attorney for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.09.2017 before D.B. Amin Khan Kundi) (Ahmad Hassan) Member Member 07/09/2017 Due to general strike of the bar and bench is incomplete, the case is adjourned for arguments on 10/10/2017 before DB. MUHAMMAD HAI MEMBER

03.03.2016

Junior to counsel for the appellant and Mr.

Ziaullah, GP for respondents present. Since the court time is over, therefore, the case is adjourned to 20.05.2016 for arguments.

Member

20.5.2016

Counsel for the appellant and Mr. Ashgar Ali, HC alongwith Ziaullah, GP for respondents present. Counsel for the appellant requested for adjournment. Adjourned for arguments on 14.10.2016.

unaber

14.10.2016

Appellant in person and Mr. Asghar Ali, H.C alongwith Mr. Kabirullah Khan Khattak, Assistant AG for the respondents present. Appellant requested for adjournment due to non-availability of his counsel. Request accepted. To come up for arguments on 30-12-16 before D.B.

(ABDUL LATIF) MEMBER

Member

(PIR BAKHSH SHAH) MEMBER

Chairman

30.12.2016

None present for the appellant and Addl. AG for respondents present. Notice be issued to the appellant and his counsel. To come up for arguments on 17.05.2017 before D.B.

11.12.2014

No one is present on behalf of the appellant. Mr. Muhammad Adeel Butt, AAG for the respondents present. The Tribunal is incomplete. To come up for rejoinder on 30.03.2015.

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Reader.

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30.03.2015 Appellant with counsel and Mr. Mir Faraz, Inspector (legal) alongwith Addl: A.G for respondents present. Rejoinder submitted. The appeal is assigned to D.B for final hearing for 13.10.2015.

13.10.2015 Counsel for the appellant and Mr. Mir Faraz, Inspector (Legal) along with Mr. Ziaullah, GP for respondents present. Appellant being confirmed as ASI vide order dated 16.10.2008 was reverted again to the rank of Head Constable vide impugned order dated 06.09.2013 on the basis of decision of the august Supreme Court of Pakistan in petition No. 89.2011. It is contention of the learned counsel for the appellant that the said decision is not applicable to the case of appellant and the impugned was passed illegally and unlawful. The said decision of the august Supreme Court of Pakistan goes to the roots of this case. Unfortunately, its copy is not available on record. Counsel for the appellant is directed to produce its copy. Partial arguments heard, to come up for copy of judgment of august Supreme Court of Pakistan and full arguments on 3 - 3 - 16

Member

er,

Appenl No. 1660/2013 Mr. Mir Bowl Stuck.

Appellant with counsel present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned order dated 06.09.2013, he filed departmental appeal on 26.09.2013, which has not been responded within the statutory period of 90 days, hence the instant appeal on 23.12.2013. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections, The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents for submission of written reply/comments on 12.05.2014.

21.02.2014

Receipt is Atlached with File.

21.02.2014

Appellant Deposited Security & Process Fee

This case be put before the Final Bench for further proceedings.

12.5.2014

.Bank

Appellant in person and Mr. Mir Faraz Khan, Inspector Legal on behalf of respondents with AAG present. Written reply received on behalf of the respondents, copy whereof is handed over to the appellant for rejoinder on 12.8.2014.

Chairman

lember

Chaimnan

12.08.2014

Neither appellant nor counsel for the appellant present. Mr. Mir Faraz, Inspector(legal) on behalf of respondents with AAG present. Rejoinder has not been received. Another chance is given for rejoinder on 11.12.2014.

Chairma

Form-A

FORM OF ORDER SHEET

Court of

1660/2013

Case No. Order or other proceedings with signature of judge or Magistrate S.No. Date of order Proceedings 5 3 2 1 31/12/2013 The appeal of Mr. Mir Bad Shah resubmitted today by 1 Miss. Ambreen Gulzar Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing. REGISTRAR 2 This case is entrusted to Primary Bench for preliminary 1-1-2014 hearing to be put up there on _____1 2014 ehahrman 41

is an appeal filed by Mr. Mir Bad Shah Khan today on 23/12/2013 against the order dated 06.09.2013 against which he preferred a department appeal on 26.09.2013 which is premature as laid down in an authority reported as 2005-SCMR-890. such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies. Memorandum of appeal may be got singed by the appellant. No. 1820/ST. Dt. 2412/2013 SERVICE TRIBUNAL KHYBER PAKHTUŃKHWA PESHAWAR. oreen Gulzar Adv. Pesh. prease lef: NO 1820/ST dt. 24 1/2 apatemental appeal of Mis-Bad-shok. is resubminised ofter sensoring the alycourg as the abjaction sensed. is vanished beinse of majacrig submiting Renad. belinted Pts.

Ambreer Sitzer Achrocake Ikigh Coust

ORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Versus

Service Appeal No 1660 /2013

Mir Bad Shah Khan, Sub-Inspector No.B/25, Police Department, District Bannu, Khyber Pakhtunkhwa, Peshawar.

..... Appellant

- 1. Government of Khyber Pakhtunkhwa, through Chief Secretary, Peshawar
- 2. Provincial Police Officer, KPK, Central Police Office, Peshawar
- 3. Regional Police Officer, Bannu Region, Bannu.

.....Respondents

S#	Description of the Documents	Annex	Pages	
1.	Service Appeal	*	1-8	
2.	Demotion order /Directives of PPO	"A"	9-10	
3.	Representation to Respondent No.2	"B"	11-20	
4.	Promotion Order as ASI by RPO.	"C"	21-22	
5.	Order of Confirmation as ASI	''D''	23-26	
6.	Promotion Order as S.I by PPO		27-28	
7.	Notification of promotion to List-E	۲ <u>۲</u>	29	
8.	Performance in cases	• "G"	30-31	
9.	Out of Turn Promotions No.2359-65/ legal dated 06.08.2013	"H"	32	
10.	Recommendation Roll for promotion as Inspectors (Serial No.17)	"J"	33-38	
11.		"K"	39-53	
12.	Wakalat Nama		.54	

INDEX

Dated:-23.12.2013

Appellant

Mir Bad Shah;S.I , Police Department, District Bannu

Through:-

Ambreen Guizar Advocate High Court Peshawar

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,

PESHAWAR.

Service Appeal No 1660 /2013

Mir Bad Shah Khan, Sub-Inspector No.B/25, Police Department, District Bannu, Khyber Pakhtunkhwa, Peshawar.

..... Appellant

Versus

Sec. 26.9 iy X16

1. Government of Khyber Pakhtunkhwa, through Chief Secretary Civil Secretariate, Peshawar.

 Provincial Police Officer, Khyber Pakhtunkhwa, Central Police Office, Peshawar

3. Regional Police Officer, Bannu Region, Bannu.

APPEAL U/S 4 OF SERVICE TRIBUNAL AGAINST THE IMPUGNED 1973 ACT. NO.2047-51/EC, ISSUED VIDE ORDER "A" – ANNEXURE BY 06.09.2013, DATED THE RESPONDENT - NO.3 WHEREBY APPELLANT HAS BEEN DEMOTED TO THE SUBSTANTIVE/OFFG: RANK OF HC/OASI. REPRESENTATION OF THE THE APPELLANT WAS NOT CONSIDERED IN FIC PERIOD BY RESPONDENT NO.2 (ANNEXURE "B").

23/2/12

Respectfully Sheweth:-

Ac-submitted to-day

The appellant respectfully submits as under:-That the appellant is a bona-fide citizen of Pakistan, believe in Rule of Law, Supremacy of Constitution and serve in Police Department, Khyber Pakhtunkhwa.

That the petitioner had joined Police Force as constable on 18.12.1977 and confirmed in the same rank on dated 01.11.1988. After passing Lower School Course, his name was brought on promotion list "C" and subsequently promoted to the rank of officiating Head constable vide Distt: Police Officer Order-Book No.1842 dated 14.11.1994. The petitioner rendered 2 years service as officiating Head Constable and after passing Intermediate School Course, his name was brought on promotion list "D" w.e. from 01.10.1996. Consequently the petitioner was promoted to the rank of officiating Assistant Sub-Inspector (ASI) vide Range Office Order Endst: No.3120-27/E.C dated 08.11.2004 at Serial No.14 vide Annexure "C".

3.

2.

The petitioner served in the rank of Off: Assistant Sub-Inspector for a period of 04 years i.e from 22.11.2004 to 16.10.2008. In the mean time, substantive post of ASI became vacant, hence, the petitioner was promoted to the rank of ASI. After passing 04 years in officiating capacity, the Competent Authority permitted the period of Offg: service to count towards the probation period under Police Rule 13.18 thus the petitioner was confirmed in the rank of ASI and allotted Range No.77/B vide Range office order Endst:No.2898/EC dated 16.10.2008 vide Annexure "D"...

4.

5.

6.

the subject of the second s

That the petitioner was promoted to the rank of officiating Sub-Inspector and brought his name on promotion list "E" in the Departmental Promotion Committee (DPC) meeting held on 16.01.2009 vide Range Office Order Endst:No.328-33/EC dated 24.01.2009 vide Annexure "E".

Later on the petitioner's along with other Police officers were promoted to the substantive rank of Sub-Inspector on 2 years probation period under Police Rules 13-10 (2) and 13-18 vide Regional Police Officer, Bannu Region, Bannu Order No.518-22/E.C dated 22.02.2013 Notification No.2742/Promotion dated 27.02.2013 vide Annexure "F"..

That since taking over the charge of higher responsibility as officiating ASI the petitioner was assigned the post of Incharge Distt:Security Branch (DSB). The task of DSB, being a very sensitive, critical and risky wich requires great tact, intelligentsia and shrewdness, was a challenge for the petitioner as it was a time when insurgency was at highest pick in the adjacent defective tribal area of Bannu district and also knocking at the door of Bannu district. Thus the DSB duty was not only risky for the petitioner but was also dangerous for his family. The petitioner performed DSB duty to the best of his capacity and efficiently as shown in the attach list of cases vide Annexure "G"

7.

That inspite of the best and examplary services on the part of petitioner, promotion of petitioner in accordance with Police Rules 1934, the Regional Police Officer, Bannu Region, Bannu vide Order No.2047-51/E.C dated 06.09.2013, in the light of directions issued by worthy Provincial Police Officer, KPK, Peshawar Memo:No.2359-65/legal dated 06.08.2013 upon the decision of the Appex Supreme Court of Pakistan vide judgment in CRL original petition No.89/2011 (copy of the same is Annexure"A". Demoted the petitioner to the substantive/officiating Rank of HC/OASI vide Annexure "H"..

8. That the impugned demotion order of Regional Police Officer, Bannu has been issued without justification and had not given chance of hearing to the petitioner.

Grounds :-

A)

C)

That the impugned order of demotion passed by the Regional Police Officer, Bannu is against law, constitution and facts on record. The order of demotin of the petitioner has been passed without giving any chance of hearing to the petitioner.

B) That the case of petitioner stands on quite different facts, law and principles laid down in the judgment as referred in the impugned order would not be extended to cover the case of petitioner.

That the promotions and confirmation as mentioned above had taken place according to Police Rules 1934 and Standing Order hence the case of petitioner is quite different from the case of out of turn promotions declared illegal in the referred judgment. The respondents have misconceived the referred judgment and wrongly applied to the case of petitioner.

D) That according to law one cannot be demoted without giving him a notice and departmental proceedings, but the petitioner has been demoted without any notice or Departmental proceedings. The basic principle of law is that no one should be condemned unheard. Hence the order of demotion of the petitioner is against law, natural justice and Constitution of the Islamic Republic of Pakistan and is worth to be set aside.

That the petitioner performed his duty very couragesly, faced and tried to curve the activities of terrorists. In recognition of his examplary services the petitioner was promoted and confirmed as mentioned above in the light of Police Rules 1934.

E)

F)

That the impugned order of demotion of petitioner has been passed in violation of Articles 2A, 4, 25, 27 and 38 of the Constitution of Pakistan 1973 and petitioner has been discriminated as such order has not been implemented throughout the Province and most of other officials in identical circumstances are enjoying their privileges uptill now. Therefore, the impugned order is not sustainable.

For the aforesaid reasons, it is therefore, humbly prayed that on acceptance of this appeal, this Honorable Tribunal may kindly be pleased to set aside the impugned order of demotion of the petitioner and to pass order and judgment in favour of petitioner as under:-

Prayer :-

To declare the impugned-order of demotion is illegal, malafide, discriminatory, against law and facts and justice. To set aside the impugned order of demotion mentioned and re-instate the petitioner as Sub-Inspector with all back benefits.

Any other relief as deemed appropriate in the circumstances of case not specifically prayed for may also be granted to petitioner.

Through:-

Dated:-23.12.2013

Appellant

Mir Bad Shah, Sub-Inspector, Police Department, District Bannu.

Ambreen Gulzar Advocate High Court Peshawar.

POLICE DEPARTMENT.

ORDER.

In light of the directions/instructions, issued by the Worthy Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar, vide CPO, Peshawar Memo: No. 2359-65/Legal dated 6.8.2013, upon the decision of the Apex Supreme Court of Pakistan vide Judgment in CRL original Petition No. 89/2011, holding out of turn promotion as illegal, violative of Article of the constitution, Law & Rules, **Confirmed Sub: Inspector Mir Badshah** B/25, confirmed from CASI as ASI in Special case by the then Worthy RPO/Bannu Region vide Order No.2898/EC dated 16.10.2008 is hereby demoted to the substantive/Offg: rank of HC/OASI and his name is placed with his colleagues/batch mates, below the name of OASI Umer Khan No. 1074 and above the name of OASI Asari Gul No.595 ,on seniority list-D, issued vide this office Notification No. 1078-87/EC dated 8.5.2013.

Ameri-H

(Azad Khan)TST, PSP Regional Police Officer, Bannu Region, Bannu.

BANNU REGION

No. 2047-51/EC, dated. 06/9/2013. 19-6/9/13.

Copy to:-

 The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar for information with reference to CPO Peshawar Memo No. quoted above please.

2. The District Police Officer, Bannu & Lakki.

3. The Supdt: of Police, Invest: Bannu & Lakki.

(Azad Khan)TST, PSP Regional Police Officer, Bannu Region, Bannu.

The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

dated Peshawar, the <u>19.6</u> / 2013.

DIRECTIVES OF PROVINCIAL POLICE OFFICER ON Subject :---SPECIAL CASE PROMOTION.

All Heads of Police in Khyber Pakhtunkhwa.

2-13/2013 1?

MEMORANDUM.

From

To

The Worthy Provincial Police Officer has ordered that Special Case promotion should be discontinued in future to provide a level playing field for all police personnel in career progression. If a Police Officer performs an act of gallantry, he should be rewarded through cash prizes, certificates, excellent annual reports, nominationfor gallantry awards such as P.P.M, Q.P.M., Tamgha-ie-Shujjat etc.

Provincial Police Officer. Khyber Pakhtunkhwa, Peshawar.

Copy to DIG/Mardan w/r to his office No. 1736/ES dated 12.06.2013 with the direction to decide the appeal of the applicants on merit keeping in view their seniority position and rules on the subject.

> Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

PSO

No 8010-17 dt 25.06 2013 Copies to SRC, MSI, p-1 1 All SDP05 for informations Mas Dpc/Ban - 24/6/20



The Regional Police Officer, Bannu Region, Bannu.

APPEAL.

Por10-1008/E1173

The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

/EC dated Bannu, the <u>03</u>/10/2013.

Subject:-

No:- 2325

From:

To:

<u>Memo:-</u>

Enclosed kindly find herewith an appeal in respect of OASI Mir Bad shah of Invest Staff, Bannu, received from SP/Invest Bannu, requesting therein for re-instatement as SI with all back benefits, for further necessary action, please.

> (Sajid Ali Khan)PSP Regional Police Officer, Bannu Region, Bannu 升 240日ろ-

BEFORE THE PROVINCIAL POLICE OFFICER, **INSPECTOR GENERAL OF POLICE KHYBER** PAKHTUN KHWA PESHAWAR.

Annenic B

THROUGH PROPER CHANNEL

<u>Departmental Appeal No.</u> /2013

SUBJECT:

DEPARTMENTAL APPEAL OF SUB INSPECTOR MIRBAD SHAH KHAN NO. B/25 INVESTIGATION STAFF AGAINST THE ORDER OF DEMOTION TO THE SUBSTANTIVE/OFFG: RANK OF HC/ OASI BY PLACING HIS NAME WITH HIS COLLEAGUES/BATCH MATES, BELOW THE NAME OF OASI UMER KHAN NO. 1074 AND ABOVE THE NAME OF OASI ASARI GUL BY THE REGIONAL POLICE OFFICER, BANNU REGION, VIDE ORDER ENDST: NO. 2047-51/EC DATED 06-09-2013.

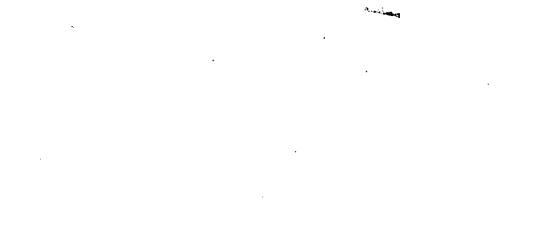
Prayer:-.

On acceptance of this appeal, the impugned Order of Demotion dated 06-09-2013-2012, may very kindly be set aside by reinstating the appellant as Sub Inspector in service with all back benefits.

Respected Sir,

1)

The appellant most respectfully and humbly submits as under:-. That the appellant had joined police Force as constable on dated 18-12-1977 and confirmed in the same Rank on dated 1-11-1988. After passing lower school course, his name was brought on promotion list "C" and subsequently promoted to the Rank of offig: Head Constable vide DPO/Office order Book No. 1842 dated 14-11-1994. The appellant rendered 2 years services as Officiating head constable and after passing Intermediate school course, his name was brought on promotion list "D" w. e. f 1-10-1996 vide Range office Notification No. 2444 - 46/EC dated 24-10-1996. Consequently he was promoted to the Rank of officiating Assistant Sub Inspector vide Range office order <u>ENDST: NO. 3120-27/EC DATED 22-11-2004.</u>



The appellant served in the rank of Officiating Assistant Sub Inspector for a period of 4 years i.e from 22-11-2004 to 16-10-2008. In the meantime, substantive posts of A.S.I became vacant. Hence, the appellant was promoted to the substantive rank of A.S.I after passing 4 years in officiating capacity, the competent authority permitted the period of officiating service to count towards the period probation under police rule 13.18 thus the appellant was confirmed in the rank of ASI and allotted Range No. 77/B vide Range office order endst: <u>No.2898/EC dated16-10-2008</u>.

That the appellant was promoted to the Rank of officiating Sub inspector along with bringing his name on promotion list " E" in the DPC meeting held on 16-01-2009 vide Range office order endst No. 328-33/EC dated 24-01-2009. Later on he, along with other police officers were promoted to the substantive rank of sub Inspector on two years probation period under police rules 13-10(2) and 13.18 vide RPO Bannu Region, Bannu order endst: No. 518,22/EC dated 22-02-2013.

That since taking over the charge of higher responsibility as officiating A.S.I, the appellant was assigned the post of Incharge of DSB. The task of DSB, being a very sensitive, critical and risky which requires great tact, intelligentsia and shrewdness, was a challenge for the appellant as it was a time when insurgency was at highest pick in the adjacent defacto tribal areas of Bannu District and also knocking at the door of Bannu District . Thus the routine business of DSB (collecting of information of criminals and suspects etc) was completely converted into spying terrorists, militants, saboteurs, Anti Stat elements and identifying their whereabouts as well as monitoring their movements and activities.

That the appellant belongs to village Jani Khel and the area of Jani Khel is considered to be the hub of militants and terrorist, therefore, it could not be dangerous only for the appellant himself but was risky for the whole family of the appellant to continue his service as In charge DSB. Nevertheless, the appellant not only continued his job by burning his boats but also come up on the expectations of his high ups. The appellant remained posted as Incharge DSB till 24-06-2013 with fully satisfaction of his high ups. His remarkable performance is tabulated as under:

4)

5)

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5.No	FIR NO. DATED U/S PS	DETAIL OF PERFORMANCE
1	FIR No. 10 dated 15-07-2009 u/s	PS Mobile was targeted through bomb
L	302/353/324/427/303/4ESA/7AT	blast in the said case and the District
	A PS Bakka Khel	Police succeeded in tracing out the actual
	A 15 DAKKA INICI	culprits through the secret information
	•	provided by the appellant
2	FIR No. 36 dated 20-07-2009 u/s	DOFC was targeted in the blast. Accused
2	302/324/427/3-4ESA/7ATA dated	were traced by the District Police on the
	20-07-2009 PS Haved	information of the appellant.
	FIR No. 91 dated 25-07-2009 u/s 3-4	A bridge was exploded by terrorist near
. 3.		mombthi Barak Zai. Accused involved in
•	EXP/427PPC PS Miryan	the case were traced out by the appellant
	TID NL 21 1 1 1 2 02 2000 - / - 5 -	An IED with a high explosive material
4	FIR No. 31 dated 3-02-2009 u/s 5	was planted under Kachkot bridge in the
	EXP/7ATA PS Cantt:	limit of PS Cantt. Due to timely
		information provided by the appellant,
	· ·	the said IED was defused and the law
•		
		enforcing Agencies including the local of the area were rescued from catastrophe.
		the area were rescued from catastrophe.
5	FIR No. 106 dated 22-11-2008 u/s	In the said case, a large number of
	324/353/427/3-4ESA/7ATA PS	miscreants had conducted attacked on PS
	Haved.	Haved. The appellant had provided early
	· · · · · · · · · · · · · · · · · · ·	information of the planned attacked just 5
		hours ahead of the occurrence.
6	FIR No. 108 dated 04-12-2008 u/s	In this case, a second attack was made on
	353/427/148/149/3-	PS Haved and information of the said
	4ESA/7ATA/302/324/	incident was provided by the appellant
		04 hours ahead of the occurrence
7	FIR No. 107 dated 25-11-2009 u/s	In this case, miscreants had attacked on
	324/353/427/148/149/7ATA PS	PP Fata Khan Khel. An early information
	Haved	were provided by the appellant just few hours ahead of the occurrence.
8	FIR No.15 dated 16-10-2008 u/s	In this case, miscreants had attacked on PR Baran Bridge and early information
	324/353/148/149/7ATA PS Bakka	PP Baran Bridge and early information were provided by the appellant just few
	Khel	hours ahead of the occurrence
<u>_</u>		
9	FIR No.16 dated 23-11-2008 u/s	In this case, miscreants had again
	324/353/427/148/149/7ATA PS	attacked on PP Baran Bridge. Prior information was provided by the
	Bakka Khel	appellant just before the occurrence.
		In this case, miscreants had attacked 3rd
10	FIR No.17 dated 30-11-2008 u/s	time on PP Baran Bridge. Early
	302/324/353/3/4EXP/7ATA PS	information were provided by the
	Bakka Khel	appellant just few hours ahead of the
		occurrence
1-1-	ETP No. 50 dated 28 04 2000 m/c	In this case, a suicide bomber had hidden
11	FIR No. 50 dated 28-04-2009 u/s	
	324/120B/148/149 PPC PS Miryan	locality of PS Miryan. His target was the
		local prayers of the area. He was detected
ļ [.] .		on the information of appellant; however, the suicide bomber was succeeded in
1		the suicide bomber was succeeded in
1	• * *	- L assessing trans the reason dite to the second
	•	escaping from the scene due to the active
		support of one militant Tariq r/o of Nurar. Later on, Tariq was arrested.

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12	FIR No.16 dated 3-12-2009 u/s	In this case, miscreants had attacked on	
	324/353/427/7AT PS Miryan	PS Miryan. An early information were	
		provided by the appellant just few hours	
	· · · · · · · · · · · · · · · · · · ·	ahead of the occurrence	
13	FIR No.15 dated 05-02-2009 u/s	-do-	
	324/353/3/4EXP/7ATA PS Miryan		
14	FIR No.18 dated 19-02-2009 u/s	-do-	
	302/353//7ATA PS Miryan.		
15	FIR No.12 dated 06-03-2009 u/s	In this case, miscreants had blasted the	
	302/324/427/3/4 ESA/7ATA PS	vehicle of Nazim Khir Ullah in which he	
	Kakki	embraced Shahdat. Just after the	
		occurrence, the miscreants were traced	
		out and arrested on the information of the	
		appellant.	
17	FIR No.168 dated 30-05-2009 u/s	Un unknown miscreants planted time	
	4ESA PS Cantt:	bomb near the office of DSB which was	
		taken away by Appellant to an open field.	
	· · ·	Where after some time, the same was	
		blasted. Accused involved in the said case	
	·	was arrested on the information provided	
		by him.	
L			

Besides the above, at about 102 P.Os involved in 76 different cases were arrested by the District police on the information of the appellant. Due to his good performance the then Inspector General of Police has awarded him Commendation Certificate. Similarly, 5 commendation Certificates have been granted by different D.Is.G while 134 commendation certificates have been granted by various DPOs which is crystal clear example of dedication, loyalty, efficiency, competency and honesty in the field of policing on the part of the appellant.

That in the light of directions/instruction, issued by the Worthy PPO, K.P.K, Peshawar vide CPO, Peshawar memo No. 2359-65/legal dated 06-08-2013 upon the decision of the Apex Supreme Court of Pakistan vide judgment in CRL original petition No. 89/2011(copy of the same is annexure "A"), the appellant has been demoted to the substantive/officiating rank of HC /OASI.

6)

That without any proper inquiry or codel formalities, whatsoever, the Regional Police Officer, Bannu Region, Bannu straight away issued the impugned order of demotion of the appellant on 06-09-2013. (Copy of the same is annexure "B").

That now the appellant most respectfully and humbly preferring this Appeal against the demotion order, inter alia on the following grounds:-

<u>GROUNDS.</u>

a) That the impugned demotion order is against the law, discretionary, arbitrary, both in law and in fact, therefore, not tenable in the eyes of law.

That the decision of august Supreme court of Pakistan vide b) judgment in CRL original petition No. 89/2011 has declared null and void the law passed by the Sind Assembly with regards to deputation, posting, induction, out of turn promotion, ante-dated seniority, re-hiring by dint of which the interest of select group of officers/individuals were protected and promoted to the disadvantage of hundreds of thousands of civil servants. A copy of the said judgment was sent to the Chief Justice, Sind high court through Registrar for circulating it amongst the learned judges along with a copy to all the chief secretaries of the provinces as well as the secretary, Establishment Division, Government of Pakistan, Islamabad with the direction to streamline the service structure of civil servants in line with principles laid down in the judgment. The chief secretary and secretary, services, Sindh were further required to comply with this judgment in letter and spirit and report compliance within three weeks. Hence the compliance of the judgment was applicable only upon the Sindah government and the other provinces were required to streamline the service structure of civil servants. Standing order No. 6/2003 passed by the Worthy PPO, KPK and police rule is still enacting in K.P.K . Therefore, demotion by K.P.K Police under the judgment as was required for Sinch government is not justifiable. Moreover, as the promotion order of the appellant is in accordance with law and police rules, therefore, do not come within the ambit of the worthy judgment of the august Supreme court and the parameters laid down fer promotion in the books of law has been followed in the case of petitioner.

8)

9)

c) That the appellant has been promoted to the substantive rank of ASI by the competent authority with condoning 2 years probationary period under police <u>rule 13.18 after passing 4 years period in the rank of officiating Assistant</u> <u>Sub Inspector vide RPO/Bannu Region, Bannu order endst: No</u>. 2898/EC dated 16-10-2008. That is why the promotion of appellant does not come in the purview of out of turn promotion and the law (Police rule) under which the appellant has been granted promotion, is still operative.

That, since the constitution of police rule up till now, police d) officials/officers have been awarded/granted promotion under the said rule(law) and a large number of officers/officials have got befits of the said law which is being still utilized by police officials/officers. Recently, under the said rules officiating sub Inspector namely Gul Nawaz Khan No. 75/B S.I Gul Janan No. 7/B, SI, Mashal No. 91/B, SI Mohammad Amin No. 29/B Ghulam Farid No. 61/B and S.I Gumar jan No. 4/B, SI Asad Ali Shah No. B/35, SI Muhammad Bashir, SI, Shahbaz Khan have been granted confirmation by condoning No. 50/B and SI Nabi Shah officiating service to count towards the period of probation under the Police rule 13.18 vide RPO/Bannu Region, Bannu order endst: No. 1297-1301/EC dated 31-05-2013, endst: No. 1323-27/EC dated 05-06-2013 and endst: No. 1343-47/EC dated 06-06-2013, endst: No. 1209-13/EC dated 27-05-2013, endst: No. 1007-011/EC dated 24-04-2013 and order endst: No. 1392-96/EC dated 17-06-2013. These orders are still intact. Therefore, only the demotion of the appellant is discriminatory one. Furthermore, the findings of the august Supreme Court in Sind Province case are not hitting the promotion of petitioner.

e) That as per law order of substantive promotion/confirmation can not be reverted without proper departmental proceeding. Hence the impugned order is lacking the norms of law. Furthermore, the promotion given to the petitioner is quiet in the guidelines of Police Rules and law of the land

f) That the appellant has been granted promotion by authority of grade 20 while the appellant has been reverted without prescribed rule by authority of grade-19. Therefore, the impugned order is not tenable under the law. Similarly, after demotion of the appellant along with other, abrupt promotion was made on the said vacancy which shows malafide the part of authority because as per laid down rules no promotion can be made on the vacancy till filling of the appeal in the

case.

1.5.---

g) That the appellant also seeks permission to appear before your good self for further explanation of his case with regards to his demotion being totally misconceived.

h) That by promoting to the petitioner no eligible police officer has been affected but the authority while demoting the petitioner has altogether ignored the provision of police rules and law of the land. Furthermore, the judgment of august Supreme Court of Pakistan has not interpreted by the authority in true prospective of law while issuing the demotion order of the petitioner.

It is, therefore, humbly prayed that on acceptance of this departmental appeal, the impugned Order of demotion from Service dated 16-09-2013, may very kindly be set aside by re-instating the appellant as S.I with all back benefits.

Dated 24 / 9 /2013

Obediently Yours,

Mirbad Shah Khan Of Investigation Staff PS City Bannu.

0333-924068B

NO-3345 df 26191013.

Copy to:

- 1. The Regional Police officer, Bannu Region, Bannu.
- 2. The District Police Officer, Bannu Region, Bannu.

Foswarded please

Investigation Banny

V7 434 Date 9 From: -• The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar. Regional Police Officer, ₹ot -The Bannu. No. 4773 /Legal Dated Peshawar the 3 - 12 - 12013. Subject:-<u>APPEAL.</u> Memo:-Please refer your office letter No.2325/EC dated 03.10.2013; on the subject noted above. Parawise comments in response to the representation of Mir Bad Shui: OASI may be submitted at earliest for disposal of the appeal. AIG/Legal. For Provincial Police Officer, ps attached Ar 09/12 Khyber Pakhtunkhwa, Peshawar, 2973 18c No Di <u>og /12</u> 113. Di <u>Di</u> Bannu for Comminis, N. x. 2. P. 0 Wispectur/Leght Fer Comments Janna. preparied 12 coetlacted to p. M. perusal p. M. DROT Banun 2

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w ROLLAS

The following Mead Constables, on promotion list " D " have been considered suitable for promotion as officiating Asstt: Jub: Inspectors, by the Range Selection Board, in a meeting, and in Range Office, Bannu; on C. 11.2004.

the plottst as noted against each.

•		-
Sy Ro - mame or no -	Fron.	至6.
 1) AlC, Jubta Kimn, 1105. 2) HC, Huzrat Jmer, 209.1 3) HC, Jehandaras, 534. 4) HC, Mohamard Jalua, 290. 5) MC, Gul Bad Shah, 1022. 6) HC, Abdal Join, 200.1 7) HC, Tir, Juhib, 723. 6) HC, Subz Jli, 1001. 9) HC, Bad Jhi, 200.1 7) HC, Tir, Juhib, 723. 9) HC, Bad Jhi, 1001. 9) HC, Subz Jli, 1001. 10) HC, Subz Jli, 1001. 11) HC, Subz Jli, 1001. 12) HC, Subz Jli, 1001. 13) HC, Subz Jli, 1001. 14) HC, Subz Jli, 203. 15) HC, Schimmard Mosena, 671. 15) HC, Subz Jli, 103. 16) HC, Subz Jli, 103. 17) HC, Subz Jli, 105. 	$\begin{array}{c c} c & p \ romotion. \\ \hline \\ - & do \\ - & do$	To. Operation Staff, Bannu. Operation Staff, Bannu. Dear and Staff, Bannu. Dear and Staff, Bannu. Dear and Staff, Bannu. Dear and Staff, Bannu.
	_ do _	lbit, lei.

Their promotion will the detect from the date of taking over charge of their migner a substituties. Their promotion notifie show any be

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POLICE DEPTT:

BETTER COPY

BANNU REGION

<u>ORDER</u>

jul

The following Head constables , on promotion list "D" have been considered suitable for promotion as officiating Asstt:Sub-Inspector, by the Range Selection Board, in a meeting, held in Range office Bannu, on 08.11.2004.

On promotion, they are posted to the Distt: as

noted against each:-

<u>S.Nc</u>	.Name & No.	From	Το
1.	HC Zabta Khan 1105	On promotion	Operation Staff, Bannu
2.	HC Hazrat Umar 209	-do-	Operation Staff, Bannu
3.	HC Jehandaruz	-do-	Operation Staff, Bannu
4	HC Muhammad Aslam 290	-do-	Operation Staff, Bannu
5.	HC Gul Bad Shah 1022	-do-	Operation Staff, Bannu
6.	HC Abduil Aziz 200	-do-	Operation Staff, Bannu
7	HC Mir Sahib 123	-do-	Operation Staff, Bannu
··· 8.	HC Sabz Ali 1001	-do-	Operation Staff, Bannu
9	HC Taj Ali 296	-do-	Operation Staff, Bannu
10.	HC Haseenullah	-do-	Operation Staff, Bannu
11.	HC Amir Khan 295	-do-	Operation Staff, Bannu
12.	HC Muhammad Naem 671	-do-	Operation Staff, Bannu
13.	HC Muhammad Khan 173	-do-	Operation Staff, Bannu
14.	HC Mir Bad Shah 181	-do-	Operation Staff, Bannu
15.	HC Asuri Gul 595	-do-	Operation Staff; Bannu
16	HC Zar Wali Khan 115	-do-	BBI, Bannu
17.	HC Gul Muhammad 266	-do-	Operation Staff, Bannu
18.	HC Gul Rehman 552	-do-	Operation Staff, Bannu
19.	HC Sanullah 172	-do-	LBI , Lakki Marwat
20.	HC Muhammad Ayaz 239	-do-	LBI ⁻ , Lakki Marwat
21.	HC Noor Kamal 155	-do-	LBI , Lakki Marwat

Their promotion will take effect from te date of taking over charge of their higher responsibilities.

Their promotion notification may be issued accordingly.

Sd/-(GHULAM MUHAMMAD) Deputy Inspector General of Police, Bannu Region, Bannu

10.3120-27/10 Inted 12 man, 22-11-The P.F.O./NWEP, Pesiswar. The M.H. Modul Branch, M.M., Nec 1994. i) • 1). The mart publice orginer, manua. 2) • 3). The plant officer, print. The dreeter, A.C. S./Alle, peaker r. ·) • 5). The wei/investigation, Bannu. 5y 🛌 The S. Sp/Investigation, Lagai. the confidential clerk, Mange Itlas, Banha. 7)。 illust montanas)) sotor general of police, and medicu, Banau. بزويدل الم OHC/SRC For information and M action Slow 8/11/04

No.3120-27/EC Dated Bannu, dated 22.11.2004.

The PPO /NWFP, Peshawar.

Copy to :-

1.

2.

4. 5.

- The DIG/ Special Branch, NWFP, Peshawar.
- 3. The District Police Officer, Bannu.
 - The Director , ACE, NWFP, Peshawar.
 - The OSI Investigation, Bannu.
- 6. The DSP / Investigation, Lakki
- 7. The Confidential Clerk, Range Office, Lakki.

Sd/-

(GHULAM MUHAMMAD) Deputy Inspector General of Police, Bannu Region, Bannu

POLICE DEPT

No. 2898

Anner E-I

Upon the recommendations made by D.P.O.Bannu vide his office Memo: No. 9463 dt: 7.10.2008 for promotion to the substantive rank of ASI as a special case in respect of OASI Mir Ead Shah No. 582 of Oper:Staff Bannu, presently posted as Incharge Distt: Special Branch, Bannu in recognition of his performance to the Distt: Police in providin valuable, accurate and timely information to the Distt: Police. That is why the Distt: Police on the spur of movement have foiled the evil activities of the Anti-Social elements, criminal and Anti-State-elements and with the established performance suitable for the D.P.O's recommendations, examined from his Service Record, OASI, Mir Bad Shah, No. 582 is hereby promoted to the substantive rank of ASI and his two-years probationary period in the subject promotion is also condoned as a special case.

He is allotted Range No. 77/B.

Necessary Gazette notification may be issued to all concerned under intimation to this office.

> (M.MASOOD KHAN AFRIDI) P.S.F. Regional Police Officer, Bannu Region, Bannu.

/EC Dt: Bannu, the $16 \mid \chi$ /08, Copy to the Distt: Police Officer, Bannu for information and n/action w/r to his office Memo: No.9463 dated 7.10.2008.

SRC to ISone Recessary woth france

(M.MAEOOD KHAN AFRIDI P.S.P. Regional Police Officer, Bannu Region, Bannu.

A CONTRACTOR

The Regional Police Officer, Bannu Region, Bannu. From To The Distt: Police Officer, B. nuu. /ECDt: Bannu, the "1/ > No.2868 108. Subject: RECOMMENDATION FOR CONFIRMATION AS ASI. MEMO: Please refer to your office Hemo: No. 9463 dated 7.10.2008. The Regional Police Officer Bannu has recorded the following remarks on the subject case :-D.P.O.Bannu. Please discuss". 11 1-h-gr Ca (OFFICE SUPDT:) For Regional Police Officer, Bannu Region, Bannu. 1. AS 5 a Huit Ag

The District Police Officer, Bannu. The Deputy Inspector General of Police, Bannu Region, Bannu.

NO. 9463 Subject: -

Memo:-

From:-

To:-

/Dated Bannu, the Ю RECOMMENDATION FOR CONFIRMATION AS ASI.

/2008.

It is submitted that since the posting of ASI Mirbad Shah as a Incharge DSB vibrant changes have been noticed by the undersigned in the performance of the District Police as he (ASI, Mir Bad Shah) is providing valuable, accurate and timely information to the District Police. That is why the District Police on the spur of movement have foiled the evil activities of the Anti social elements, criminals and Anti State elements. The performance of ASI, Mirbad Shah (Incharge DSB) is appreciable and needs to be rewarded for his encouragement.

Keeping in view his excellent and tremendous performance, he is hereby recommended to be confirmed against the post of ASI as a special case for his encouragement and justice please.

District Police Officer, Bannu 🕰



POLICE DEPARTMENT

BANNU DISTRICT:

FOR PUBLICATION IN THE NWFP POLICE GAETTE PART II ORDERED BY THE DISTRICT POLICE OFFICER, BANNU.

NOTIFICATION

Dated Bannu the, <u><u>371/0</u> 2008 No. <u>10041</u> /PROMOTION. Having been approved for promission as a special case vide Regional Police Officer, Bannu Region, Bannu order Endst: No. 2898/EC dated 16/10/2008, Offig: Assistant Sub Inspector Mir Bad Shah No. 582 of operation staff Bannu, presently posted as Incharge Distt; Special Branch, Bannu is hereby considered suitable for promotion to the Substantive Rank of Assistant Sub Inspector as a special case and allotted Range No. 77/B.</u>

> District Police Officer, Bannu.

/2008.

No.

2.

/dated Bannu, the

Copy of above is submitted to:-

The Regional Police Officer, Bannu Region, Bannu for favour of information,

The Additional Inspector General of Police/Investigation NWFP, Peshawar along with tow spare copies of the Gazette Notification for favour of . publication in the NWFP Police Gazette Notification.

> District Police Officer, Bannu.

, concellioj. The Septremental Committee h considered smithble the following assot to himspectors for pr as Offgelubelinopectors in its meeting, 111 on 76.4.2009. They else brought on promotion line " "" " Their premotion the take effect from de tob of thicks over charge of their higher responsabilities. Mecoscary Capette : :: Lication ney be issued to all concerned under jutimation to this office. On promotion, they are posted to the Di as noted against their names:-Since Mane of Officer. Flace of Fosting T).ASI, Bardad Rhan 27/B.L Banne Distt: 2). SI, Abias Mhan, 53/B. V Panny Distrig 3).437, Intiaz Eman, 72/5 Invest Comme Wassi; Inayatullah, 25/B.V Zanna Distre. 5). ASI, Harb Names, TS/B. V Banna Distri. 6), ADI, Gul Janan, 7/2. V Banni Master 7).ASI, Instansean, 8/3. Cenna Cistri. 3) 401, 22 2nd Shan, 77/3.V İnvesti Ennu. 9).ASI, GEI Barress, 28/3. V Tannu Dister -10).ASI; Abdul Khuman, 69/5. / lann: Distt:. C REPROPER SHARE APRIL Regional Louice Officer. Penna 22 doni, Sannais No. 328-33 ALC 35:24 1.1 *1*09., Gopy to 1-The Provincial Police Ciricer, NAFR, Jes . for information ?)。 The DyrInspector General of Tolice, Sol Lanch, North, Peshawar 2. The Rogicsul Folice Officer, DIGhan der the DiKhan, 326 - 4. 20 The Diest: Police Officer, Barnu and In Ki for inf infactio 51. The Supervise Police Towesti Bannu. SRC/Po for Mormation K. MARDON AND A MAIDI and further n/action the Officer; 1.

POLICE DEPARTMENT

BANNU DISTRICT

FOR PUBLICATION IN THE NWFP POLICE GAZET'S PART-II ORDERED BY THE DISTRICT POLICE OFFICER BANNU.

NOTIFICATION

Dated Bannu the, _____ /___ /2009.

No. _____/PROMOTION. Having been approved for promotion _______ as Officiating Sub-Inspector in the meeting held on 16.01.2009 in Range Office, Bannu the names of the following Assistant Sub-Inspector were brought on promotion list "E" and are also promoted as Officiating Sub-Inspectors from the date of taking over the charge of higher responsibilities vide Regional Police Officer, Bannu Region, Bannu Order Endst No. 328-33/EC dated 24.01.2009.

S/NO RANK & NAME

S/NO		CHARGE OF HIGHER RESPONSIBILITIES.
1	ASI Imtiaz Khan No. 72/B	24.01.2009
2.	ASI Inayat Ullah No. 25/B	24.01.2009
2	ASI Khub Nawaz No. 13/B	04.02.2009
<u> </u>	ASI Mir Badi Shahi No. 77/B	26.01.2009
5	ASI Gul Hamid No. 28/B	30.01.2009
6	ASI Abdul Hanan No. 62/B	24.01.2009
	4	· // / · · · · · · · · ·

District Pblice Officer, Bannu.

DATE OF TAKING OVER THE

No - 1255-57 Dated Bannu, the 12 / 2 / 2009

Copy of above is submitted to:-

- 1. The Regional Police Officer, Bannu Region, Bannu for favour of information.
- 2. The Additional Inspector General of Police/Investigation, NWFP, Peshawar along with tow spare copies of the Gazette Notification for favour of publication in the NWFP, Police Gazette Notification.

District Police Officer, Bannu POLICE DEPARTMENT

BANNU DISTRICT

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II ORDERED BY THE DISTRICT POLICE OFFICER, BANNU.

Annemet

NOTIFICATION.

Dated Bannu the, 27.02 /2013.

No. <u>2742</u> /<u>PROMOTION</u>. Having been approved by the departmental promotion committee meeting, held in Regional Police Office Bannu on 13.02.2013 at 12:00 hours, the following Offg: Sub: Inspector on LIST -E- of Bannu Region are here by promoted to the substantive rank of sub-Inspector on two year probation under Police Rules 13-10(2) and 13-18:- Vide RPO Bannu order No.518,22/EC darea 22.02.2013.

They are allotted Range-number as noted against their names.

S: No.	Name and No.	Allotted Range Nos.
1.~	SI, Asif Mahmood No. 24/B.	B/1.
2.	SI, Sardad Khan No. 22/B.	B/2.
3. 5	SI, Mir Bad Shah No. 77/B.	B/25.
4	SI, Umer Niaz Shah No. 16/B	3/26.

ce Office

No. ____/ dated Bannu the /02/2013.

Copy of above is submitted to:-

- 1. The Regional Police Officer Bannu, Region Bannu with reference to his office quoted above.
- 2. The Additional Inspector General of Police /Investigation KPK, Peshawar along with two spare copies of the gazette Notification for favour of publication in the KPK Police Gazette Notification.
- 3. The Commandant Elite Force KPK Peshawar.
- 4. The Deputy Inspector General of Police, DCT, SB: Khyber Pakhtunkhwa Peshawar.

5. The Superintendent of Police Investigation, Basinu.

District Police Officer Bannu

<u>،</u>	, ',''s. 	GI M	
·	Anne	hick of Case	s Innestigated by the Petitioner
-	. •		3
		· · · · · · · · · · · · · · · · · · ·	
		TED U/SPS	DETAIL OF PERFORMANCE
<u>No.</u> 1	FIR NO. DI	dated 15-07-2009 u/s	PS Mobile was targeted through bomb
T	-302/353/32	24/427/303/4ESA/7AT	blast in the said case and the District
	A PS Bakka	Khel	Police succeeded in tracing out the actual
		· · · · ·	culprits through the secret information
		·	provided by the appellant DOFC was targeted in the blast. Accused
2	FIR No. 36	dated 20-07-2009 u/s	
	302/324/4	27/3-4ESA/7ATA dated	information of the appellant.
	$120_{-}07_{-}2009$	PS Haved	1 A bridge was exploded by terrorist near
3.	FIR No. 91	dated 25-07-2009 u/s 3-4	mombthi Barak Zai. Accused involved in
	EXP/427P	PC PS Miryan	the case were traced out by the appellant
		1. 10.00.000/05	An IED with a high explosive material
4	FIR No. 31	dated 3-02-2009 u/s 5	was planted under Kachkot bridge in the
	EXP/7AT	A PS Cantt:	limit of PS Cantt. Due to timely
			information provided by the appenant,
			the said IFD was defused and the law
			enforcing Agencies including the local of
			the area were rescued from catastrophe.
5	FIR No. 1	06 dated 22-11-2008 u/s	In the said case, a large number of
5	324/353/	427/3-4ESA/7ATA PS	
	Haved.		Haved. The appellant had provided early
	1 fu / cui		information of the planned attacked just 5
			hours ahead of the occurrence. In this case, a second attack was made on
6	FIR No.	108 dated 04-12-2008 u/s	PS Haved and information of the said
-	353/427	/148/149/3-	incident was provided by the appellant.
	4ESA/7	ATA/302/324/	04 hours ahead of the occurrence
		105 11 0000 11/1	the this case miscreants had attacked on
7	FIR No.	107 dated 25-11-20(19 u/s	DD Esta Khan Khel. An early information
	324/353	/427/148/149/7ATA PS	were provided by the appellant just lew
	Haved		hours ahead of the occurrence.
	FIR No	15 dated 16-10-2008 u/s	In this case, miscreants had attacked on the
8	324/353	3/148/149/7ATA PS Bak	
	Khel		
		·	hours ahead of the occurrence In this case, miscreants had again
	9 FIR No	.16 dated 23-11-2008 u/s	
	324/35	3/427/148/149/7A1A	information was provided by the
	Bakka	Khel	appellant just before the occurrence.
 		17.1 1 20.11.2008 11/5	c In this case, miscreants had attacked on
	10 FIR No	0.17 dated 30-11-2008 u/s 24/353/3/4EXP/7ATA F	pc time on PP Baran Bridge Early
	302/3. Bakka	Khel	information were provided by the
	Dakka		appellant just few hours ahead of the
			/s In this case, a suicide bomber had hidd
	11 FIR N	o. 50 dated 28-04-2009 u/	/ has a final first first or or on 10 10
	324/1	20B/148/149 PPC PS Mi	Irvan Innisen in the outer of the target was the
			local prayers of the area. He was detec
			on the information of appellant; however
			the suicide homber was succeeded in
			oscaping from the scene due to the actu
			support of one militant larig r/o or
			Nurar. Later on, Tariq was arrested.

12	FIR No 16 dated 2 10 per	
	FIR No.16 dated 3-12-2009 u/s 324/353/427/7AT PS Miryan	In this case, miscreants had attacked on PS Miryan. An early information were provided by the appull
13	RIP No 15	provided by the appellant just few hours ahead of the occurrence
	FIR No.15 dated 05-02-2009 u/s 324/353/3/4EXP/7ATA PS Miryan FIR No.18 dated 10 02 area	ahead of the occurrence
14		-do-
15	FIR No.12 dated 06 02 2000	
:	$1^{}/2^{}/4^{}/4^{}$	In this case, miscreants had blasted the vehicle of Nazim Khin III
	Kakki	vehicle of Nazim Khir Ullah in which he embraced Shahdat. Just after the
		occurrence, the mission
7	FIR No 169 1	out and arrested on the information of the appellant.
, -	FIR No.168 dated 30-05-2009 u/s 4ESA PS Cantt:	Un unknown miscronet
.		
	1	blasted. Accused invest
		was arrested on the information provided

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R 1 1:00

Provincial Police Officer, Hie Lhyber Pakhtunkhwa, Peshawar,

罰

All Regional Police Officers, The Khyler Pakhtunkhwa. Allegal dated Peshawar the No 22.59-65

/2013 8

Ann

13/08/0

OUT OF TURN PROMOTION. Subject: Abriao

The issue of out of turn promotion was discussed threadbare in a meeting chaired by the undersigned held on 29.07.2013.

As directed earlier that whoever displayed outstanding performance, he may be awarded each reward and other monetary benefits while out of usn? promotion were completely basined because behind such exercise favouritism and nepotism cannot be ruled out on one hasd and heart burning of his colleagues and legal complication on the other.

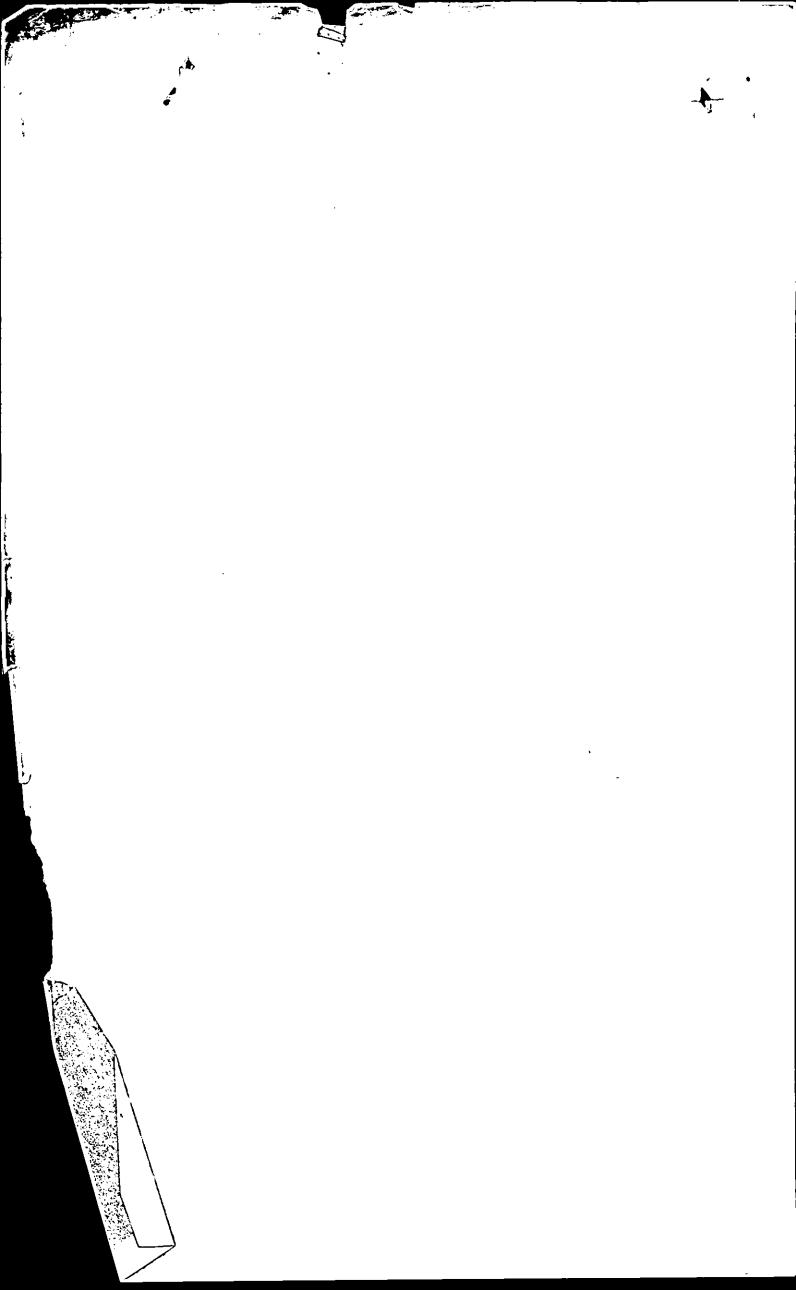
The Honorable Supreme Court of Pakistan vide its Judgment in CRL Original petition No.39/2011 etc has also held our of turn promotion as illegal, violative of Article of the constitution, Law & Rules.

In compliance with the above directions Peshawar Police domoted those Officers/Officials who were promoted out of turn and this practice was appreciated and declared in accordance with Law, Rules and dictum of the Apex Court, Regarding out of turn promotion of fourteen officers in Mardan Region, it was directed that such promotions should be cancelled immediately

In addition to the above it is also directed that all Police Units and field formation commanders should by following the analogy of the decision of the Apex Court and as well as action taken by the Peshawar Police, they should cancel the out of turn promotion if any, in this regard the RPO's District Police Officers. Police Units and field formation commander are directed to submit-report within 29 18-07 days showing demotion of the Police Officiers/Officials who were given out of turn promotion so that seniority lists of all canks of Police Officers may be naintained in accordance with Law & Rules,

Provincial Khyber Pakhtenkhwa, Peshawa

12.1 Pallitra



From: -	The Regional Police Officer, Bannu, Region, Bannu.	(2)	6		
То: -	The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.			· · ·	
No:- 1431	/EC dated Bannu, the <u>19</u> /06/2013.			· .	
Subject:-	PROMOTION AS INSPECTORS	1 - 1 ₂ - 14		a Ada	
MEMORANDU	<u>M.</u>	- - -			

Kindly refer to CPO, Peshawar Memo: No. 9489-505/E-II dated 24.4.2013 and Memo: reminder No. 11826-/E-II dated 23.5.2013.

It is submitted that the Recommendation Rolls on form 13.15(1) and pre-requisites of the following confirmed Sub: Inspectors of Bannu Region from at serial No. 1 to 26 with the exception of at serial No. 2, 8 and 24 are submitted herewith as desired, please.

				•	Date of		Date of passing	Date of	_	SB, PTC Hangu , Elite vestigation.	No pending department	
S.No	Name & No	Home Distt:	D.O.B	D.O.E	Promoti on as SI	Educ :	Upper Class Course	confirmati on as SI	From	То	Place	al enquiry certificate/ Remarks
							Passed.	· ·	07.06.2010 07.12.2010	6.12.2010 31.3.2011	Insp: C/O Nrg I/C Inv: PS G.Khel Invest office Lakki	
1	SI, Gul Faraz No. B/15.	Lakki.	02.10. 1954.	05.05.	21.10.20 04.	10 th :	20.10.200	18.08.2008.	22.03.2011 16.04.2011 11.06.2011 03.08.2012	15.04.2011 10.06.2011 02.08.2012 To-date.	I/C Inv: PS G.Khel I/C Inv: PS Dadiwala I/C Inv: PS G.Khel	Yes.
2.	SI, Zafarullah No. B/21.	. Lakki.	31.01. 1970.	11.01. 1995.	07.10.20 04.	BA.	Service record not available due to his transfer to MMPI- Staff.	17.09.2009	27.10.2004 11.03.2005 14.04.2005 26.07.2005 12.07.2006 31.03.2006 18.01.2007 27.11.2007 05.10.2010 16.11.2010	10.01.2005. 13.04.2005. 25.07.2005. 11.07.2006 29.07.2006 17.01.2007 26.11.2007 04.10.2007 15.11.2010 20.01.2011	SHO PS Pezu SI PS Lakki SHO PS Tajori I/C Invest PS Nrg Operation Staff Lakki Operation Staff Lakki I/C PP Gambila Transfer to LBI SHO PS Tajori Police Lines Lakki	Yes.

4. SI, Mohammad Ayub. Lakki. 11.0.4. 19.10. 19.10. 1958. 19.10. 19.10. 1958. 25.08.20 1976. FA. Nil 25.08.2010 0.0.6. 19.01.2010 77.12.2010 10.02.2010 06.12.2010 11.22.010 I/C Inv PS Naurang 06.04.2010 I/C Inv PS Naurang 11.12.2010 1/C Inv PS Naurang 11.12.2010 4. SI, Mohammad Ayub. Lakki. 11.0.4. 1958. 19.10. 1976. 25.08.20 06. FA. Nill 25.08.2010 25.07.2011 31.07.2011 1/C Inv PS Dadiwala 01.08.2011 VC Inv PS Dadiwala 10.08.2011 Yes. 5. SI Imtiaz Khan No.B/13 Bannu 05-03- 1955 1970 2006 9 th . SHO PS Miryan: 12.04.2012 22-11-2007 to 22-07-2008 1/C INV PS Township 17-01-2011 to 06-08-2012 1/C INV PS Township 01-01-2013 to 10.06.2013 1/C INV PS Township 17-01-2011 to 06-08-2012 1/C INV PS Baika Khel 11-01-2010 to 17-01-2011 1/C INV PS Township Nill 6. SI Mir Qabaz No.B/16 Lakki 1955 1975 2006 10 th : 3/L Nill 04.10.2011 SHO PS Kakki 06-07-2010 to 13-08-2010 SHO PS Kakki 06-07-2010 to 13-08-2010 SHO PS Kakki 06-07-2010 to 13-08-2010 SHO PS Kakki 06-07-2011 to 25-05-2011 Nill	,		ŝ			_					_	unite activity		
3 SI, Abdul Khanan No. B/17. Lakki. 02.11. 19.12. 24.01.20 10 ^b . Passed. 20.12.000 SHO PS Basis Khel Bu 3 SI, Abdul Khanan No. B/17. Lakki. 02.11. 19.12. 24.01.20 10 ^b . Passed. 20.12.01 03.02.001 SHO PS Basis Khel Bu 3 SI, Abdul Khanan No. B/17. Lakki. 02.11. 19.12. 24.01.20 10 ^b . Passed. 22.01.201 03.02.001 SHO PS Basis Khel Bu 3 SI, Abdul Khanan No. B/17. Lakki. 02.11. 19.12. 24.01.20 10 ^b . Passed. 22.01.201 03.02.001 SHO PS Para Lakki 2.01.201 SI D.02.01 SHO PS Mardan Bu Nil. 10.02.011 SHO PS Mardan Bu Nil. 0.0 0 0 0 0 0.02.021 Bio PS Mardan Bu Nil. 11.2012 0.20.201 SHO PS Mardan Bu 0.70.62.021 SHO PS Mardan Bu 0.70.62.021 SHO PS Mardan Bu Nil. 11.2012 0.20.02.01 Nil PS Natrang 0.60.2.021		•	24											
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3. SI, Abdul Khanan No, B/17. Lakki. 02.11. 1966. 19.12. 1987. 24.01.20 0.9. 10 ⁴ : 1987. Passed. 20.09.201 28.092009. 28.092009. 15.10.2009 28.092009. SHO PS Similari Bu 0.0 SHO PS Mindan Bu 0.0 SHO PS Mindan Bu 0.0 3. SI, Abdul Khanan No, B/17. Lakki. 02.11. 1966. 19.12. 1987. 24.01.20 0.9. 10 ⁴ : 0.9. Passed. 20.09.201 28.092009. 0.0 28.092010. 0.0 SHO PS Mandan Bu 0.0 Nil. 4. SI, Mohammad Ayub. Lakki. 11.0.4. 1958. 19.10. 19.0 25.08.20 0.0 FA. Nil 25.08.20 0.0 I/C Inv PS Nanrang 0.0	`	۰ ۲		1	1			!				10 4410.		[
3. SI, Abdul Khanan No, B/17. Lakki. 02.11. 1966. 19.12. 1987. 24.01.20 0.9. 10 ⁴ : 10 ⁴ : Passed. 20.09.201 28.092009, 28.092009, 0.9. 13.10.2009 28.0.2010 SHO PS Similaria Bu SHO PS Similaria Bu 20.02.011 SHO PS Martian Bu SHO PS Martian Bu 13.10.2011 3. SI, Abdul Khanan No, B/17. Lakki. 02.11. 1966. 19.12. 1987. 24.01.20 0.9. 10 ⁴ : 0.9. Passed. 20.09.201 28.092009, 0.9. 28.092009, 0.9. SHO PS Martian Bu SHO PS Martian Bu 0.0. Nil. 4. SI, Mohammad Ayub, 4. Lakki. 19.10. 1988. 19.10. 1987. 25.08.20 0.9. FA. Nil. 25.08.2010 17.02.002 0.9.9.2012 SHO PS Martian Bu 0.0.02.011 SHO PS Martian Bu 0.0.02.011 Nil. 4. SI, Mohammad Ayub, 5. Lakki. 19.10. 1958. 25.08.20 1970. FA. Nil 25.08.2010. 10.02.011 10.02.011 10.02.015 10.02.011 10.02.011 10.02.011 10.02.0		المجرينين	e de la companya de la								· · · · ·			¥
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3. SI, Abdul Khanan No, B/17. Lakki. 02.11. 19.12. 24.01.20 10 th . Passed. 29.01.2011 07.02.2011 07.02.2011 07.02.2011 SHO PS Pazu Lakki 3. SI, Abdul Khanan No, B/17. Lakki. 19.12. 1987. 09. 10 th . Passed. 28.09.2009 28.09.2019 03.09.2011 SHO PS Pazu Lakki Nil. 4. SI, Abdul Khanan No, B/17. Lakki. 19.12. 1987. 1987. 09. 10 th . Passed. 28.09.2009 28.09.2019 13.10.2011 SHO PS Pazu Lakki Nil. 5. SI, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 FA. Nil. 25.08.201 GA 2010 I/C Inv PS Narang 6. SI Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 FA. Nil. 25.08.2010 GA 2010 I/C Inv PS Lakki Yes. 7. 4. SI, Mohammad Ayub. Lakki. 19.10. 25.08.20 FA. Nil. 25.08.201 GA 2010 I/C Inv PS Lakki Yes. 9. 19.70. 05.03. 19.70. 2	.**								•		i.		4	
3. SI, Abdul Khanan No. B/17. Lakki. 02.11. 19.12. 24.01.20 09. 10 th : Passed. 20.09.201 28.09.2009 0.09.2011 07.02.2011 0.09.2011 07.02.2011 0.09.2011 SHO PS Mardan Bu SHO PS Mandan Bu Nil. 3. SI, Abdul Khanan No. B/17. Lakki. 1966. 1987. 0.9. 10 th : Passed. 0.0. 28.09.2009 05.09.2011 0.02012 SHO PS Mardan Bu 05.09.2012 SHO PS Mardan Bu 07.06.2012 SHO PS Mardan Bu 07.06.2012 SHO PS Mardan Bu 07.06.2012 SHO PS Mardan Bu 07.06.2013 SHO PS Part Lakki 4. SI, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 06. FA. Nil 25.08.201 06.04.2010 05.04.2013 OC Inv PS Naurang 11.12.2010 VC Inv PS Naurang 11.12.2010 VC Inv PS Naurang 11.12.2010 VC Inv PS Lakki 5. SI Imuiaz Khan No.B/13 Bannu 05-03- 03-05- 25-08- 9 th : 1975 Nil. 19.05- 10 th : 1975 02-09- 25-08- 9 th : 1975 SHO PS Mairang 10-0-2013 VC Inv PS Lakki Yes. 5. SI Imuiaz Khan No.B/13 Bannu 05-03- 03-05- 25-08- 9 th : 1975 10 th : 1975 02-09- 25-	į			l					1	**				
3. SI, Abdul Khanan No. B/17. Lakki. 02.11. 192.2 24.01.20 10 ^a . 28.09.209 28.09.209 22.02.2011 03.09.2011 SHO PS Mandan Bu Nil. 3. SI, Abdul Khanan No. B/17. Lakki. 1966. 1987. 09. 10 ^a . 28.09.2091 28.09.2009 22.02.2011 03.09.2011 SHO PS Mandan Bu Nil. 4. SI, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 FA. Nil. 10.42013 U. Dakki 10.42013 U. Dakki 4. SI, Mohammad Ayub. Lakki. 19.10. 25.08.20 FA. Nil. 25.08.2010 06.42010 06.12010 U. Dakki 10.10.2011 U. Dakki 5. SI Imtiaz Khan No.B/13 Bannu 05.03- 1970 20.66 5 ^a . SHO PS Markang Yes. 6. SI Mir Qabaz No.B/16 Lakki. 19.5 1970 20.06 FA. Nil. 19.05.2011 21.02011 VC Inv PS Natrang Ves. 5. SI Imtizz Khan No.B/13 Bannu 05-03- 03-05- 25-08- 5 ^b . SHO PS Markang <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>•</td> <td></td> <td></td> <td></td> <td></td> <td></td>									•					
3. SI, Abdul Khanan No. B/17. Lakki. 19.12. 24.01.20 10 ^h . 20.09.201 28.09.2009 22.02.011 15.02.011 SHO PS Mandan Bu Nil. 3. SI, Abdul Khanan No. B/17. Lakki. 1987. 09. 0 0 0 0.05.09.2011 13.10.2012 SHO PS Mandan Bu 05.09.2012 SHO PS Mandan Bu 4. SI, Mohammad Ayub. Lakki. 19.10. 25.08.20 0.09.201 0.00.00.2012 SHO PS Nandan Bu 0.07.02.012 0.09.2012 SHO PS Mandan Bu 4. SI, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 FA. Nil 25.08.2010 0.05.04.2010 UC Inv PS Naurang 4. SI, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 FA. Nil 25.08.2010. 0.01.02.010 UC Inv PS Lakki Yes. 5. SI Imtiaz Khan No.B/13 Bannu 05-02- 03-05- 25-08- 9 ^h . SHO PS Target Si Inv PS Lakki Yes. 5. SI Imtiaz Khan No.B/13 Bannu 05-02- 03-05- 25-08- 9 ^h . SHO PS Target Si Inv PS Target Si Inv PS Target								•	Passed					
4. Sl, Mohammad Ayub. Lakki. 11.04. 19.06. 19.87. 09. 0 0.50.02.012 11.02.0211 SHO PS Mandan Bu 4. Sl, Mohammad Ayub. Lakki. 11.04. 19.01. 11.02.011 SHO PS Mandan Bu 07.02.012 25.04.2012 SHO PS Mandan Bu 4. Sl, Mohammad Ayub. Lakki. 11.04. 19.01. 10.02.012 0.00.02.012 SHO PS Mandan Bu 4. Sl, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 06.04.2010 10.12.2012 10.70.11. 10.10.12.011 5. Sl, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 06. FA. Nil 25.08.2010 25.07.2011 31.07.2011 U/C Inv PS Naurang 10.08.2011 11.04.012 Sl. MPS Miryan: 22.11.2010 05.04.2010 U/C Inv PS Lakki 5. Sl Imtizz Khan No.B/I3 Bannu 05.03 25.08. 9 th : Sl OPS Miryan: 22.11.2010 to 17.01.2011 U/C Inv PS Lakki 6. Sl Mir Qabaz No.B/I6 Lakki </td <td>,</td> <td>2</td> <td>SI Abdul Khanan No. B/17</td> <td>Lathi</td> <td>02.11.</td> <td></td> <td>24.01.20</td> <td>10th</td> <td></td> <td>28 00 2000</td> <td></td> <td></td> <td></td> <td>Nil</td>	,	2	SI Abdul Khanan No. B/17	Lathi	02.11.		24.01.20	10 th		28 00 2000				Nil
4. Sl, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.201 SHO PS Mandan Bu 07.07.2012 SHO PS Mandan Bu 2.		-2.	51, Audul Khallan No. D/17.	Larri.	1966.	1987.	09.	10.		20.09.2009.	05.09.2011	13.10.2011	SHO PS Mandan Bu	· INII,
4. SI, Mohammad Ayub. Lakki. 11.04. 19.10. 25.08.20 06.07 PA Nil 25.08.201 05.03.2013 SILO PS Saddar Bu 5. SI Imtiaz Khan No.B/13 Bannu 05-03- 1955 03-05- 1970 25.08.20 206 PA Nil 25.08.201 25.08.201 05.03.2013 SILO PS Pazu Lakki L0 Lakki VC Inv PS Naurang VC Inv PS Naurang 5. SI Imtiaz Khan No.B/13 Bannu 19.70 25.08.20 06.01 PA Nil 25.08.201 VC Inv PS Naurang VC Inv PS Naurang 6. SI Mir Qabaz No.B/16 Lakki 19.55 1975 20.06 PA Nil 19.05.2011 U/C Inv PS Naurang VC Inv PS Naurang 6. SI Mir Qabaz No.B/16 Lakki 19.55 1975 25.08.20 PA Nil 19.05.2011 U/C Inv PS Naurang VC INV PS Miryan 22.010.10 U/C Inv PS Naurang VC Inv PS Naurang VC Inv PS Naurang VC Inv PS Naurang VC INV PS Miryan 22.010.10 10.10.2011 VC Inv PS Naurang VC Inv PS Naurang VC Inv PS Naurang VC INV PS Miryan 22.010									U			11.02.2012	SHO PS Mandan Bu	
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4. SI, Mohammad Ayub. Lakki. 11.04. 1958. 19.10. 1976. 25.08.20 06. FA. Nil 25.08.2010 25.07.2011 05.04.2010 06.12.2010 10.12.2010 UC Inv PS Naurang 06.04.2010 10.12.2010 UC Inv PS Naurang 11.12.2010 VC Inv PS Naurang 11.12.2010 VC Inv PS Naurang 11.12.2010 VC Inv PS Lakki 4. SI, Mohammad Ayub. Lakki. 19.0. 1958. 19.0. 1976. 25.08.20 06. FA. Nil 25.08.2010. 05.04.2010 25.07.2011 VC Inv PS Lakki Yes. 5. SI Imtiaz Khan No.B/13 Bannu 05-03- 1955 03-05- 1970 25-08- 2006 9 th : Nil. Nil. 19.05.2011 VC INV PS Township VC INV PS Township 11-01-2011 to 06-08-2012 VC INV PS Township Nil 6. SI Mir Qabaz No.B/16 Lakki 20-12- 1955 02-09- 1975 2006 10 th : Nil Nil 04.10.2011 SHO PS Bakka Khel 14-12-2009 to 05-04-2010 VC INV PS Township Nil 6. SI Mir Qabaz No.B/16 Lakki 1955 1975 2006 10 th : Nil Nil 04.10.2011 SHO PS Bakka Khel 14-12-2009 to 05-04-2010 VC INV PS Cant 29-06-2012 to 10-06-2010 to 13-08-2010			· .								05.03.2013	11.04.2013	LO Lakki	
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	7	SI Miran Shah No.B/11	Lakki	07-08-	26-08-	25-08-	10 th :	Nill	04.10.2011.	I/C INV PS Mandan 30-11-2011 to 10-04-2012	Nil
	7.	SI Miran Shan No.d/11		1953	1975	2006	10.1	INILI	04.10.2011.	Interment Center Lakki 10-05-2012 to 18-06-2012	
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	8.	SI Mehmood Nawaz No.	Lakki.	07.03.	29.02.	02.07.20	FA.	Passed.	04.10.2011	I/C Inv PS G. Khel 14.04.2006 to 09.09.2007	-
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44 44 mg 	9.	SI, Mir Ahmed No. B/8.	Lakki.	18.12.	22.10.	04.07.20	10 th :	20.03.199	21.12.2011.	20.09.2009 - Transfer to Bannu	Yes.
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	10	SI Aman Ullah No.B/3	Bannu	1957	1974	06 '	BA		05.07.2012		INH.
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	11	SI Muzamil No.B/12	Bannu	1956	1974	07	10 th :	Nil.	05.07.2012.	I/C INV PS Saddar 02-05-2011 to 01-12-2011	Nil.
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	12.	SI Inayat Ullah No.B/6	Lakki	01-04-		18-12-	10 th :	Nil.	05.07.2012	I/C INV PS Saddar 02-03-2010 to 02-05-2011	Nil.
	12.	SI Illayat Ollan No.D/G	Lann	1957	1975	2007 .	- · · · · · · · · · · · · · · · · · · ·		05.07.2012	I/C INV PS Bakka Khel 02-05-2011 to 25-05-2011	
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· · · · · · · · · · · · · · · · · · ·	13.	SI Asif Mehmood No.B/1	Bannu	25-04- 1975	15-01- 2004	04.07.2008	FA,	Passed.	22.02.2013	SI BBI Bannu :01-01-2010 to 01-04-2010I/C INV: Basya Khel09-02-2011 to 24-05-2011SHO PS Mandan25-04-2012 to 06-07-2012SHO PS Jani Khel24-08-2012 to 01-10-2012I/C INV PS Township18-12-2012 to 02-01-2013I/C INV PS Bakka Khel02-01-2013 to date	Nil.
	· 14.	SI Shabaz Klıan No.B/27	Bannu	03-02- 1956	19-10- 1976	04.07.2008	10 th :	Nil.	22.02.2013	SHO PS Ghoriwala01-01-2010 to 03-08-2010SHO PS Domel03-08-2010 to 05-09-2011SHO PS Kakki05-09-2011 to 30-11-2011I/C INV PS Basya Khel28-01-2012 to 18-06-2012Interment Center28-01-2012 to 18-06-2012Fizaghot Swat10-08-2012 to 26-11-2011I/C INV PS Domel10-08-2012 to 26-11-2011I/C INV PS Saddar10-08-2012 to 22-04-2013SHO PS City22-04-2013 to date	Nil.
	15.	SI Mohammad Bashir No.B/28.	Lakki.	01.11. 1958.	02.09.197 5	04.07.2008	10 th :	Nil.	22.02.2013	12.11.2011 05.02.2012 SHO PS Dadiwala 06.02.2012 05.12.2012 ASHO PS G.Khel 06.12.2012 To-date. QRF Platoon	Nil.
	16	SI Sardad Khan No.B/2	Lakki	22-02- 1961	07-10- 1980	24.01.2009	FA.	Passed.	22.02.2013	SHO PS Bakka Khel14-03-2009 to 05-06-2009SHO PS Township05-06-2009 to 30-10-2009SHO PS Jani Khel03-08-2010 to 29-11-2010	Nil.
I I	17.	SI Mir Bad <u>Shah</u>	Bannu	01-01- 1959	18-12- 1977	24.01.2009	10 th : *	Ńil.	22.02.2013	I/C INV PS City 02-05-2011 to date	Nil.
	18	SI Umer Niaz Shah No.B/26	Bannu	12-02- 1958	07-07- 1977	13.08.2009	FA.	Nil.	22.02.2013	DI Khan Region 01-09-2008 to 28-02-2009 DCT, Peshawar 01-03-2009 to date	Nil.
	19	SI Ghulam Farid No. B/33	Lakki	07-11- 1959	10-12- 1977	31.03.2008	10 th :	Passed. 06.09.201 0	31.05.2013	SHO PS Cantt16-01-2009 to 01-10-2009RI Line01-04-2010 to 29-04-2010SHO PS Cantt29-04-2010 to 23-08-2010CO/HQ Circle23-08-2010 to 08-02-2011SHO PS City08-02-2011 to 21-07-2011RI Line21-07-2011 to 05-11-2011SHO PS Domel05-11-2011 to 26-11-2011RI Line26-11-2011 to 19-12-2011Transferred to ACE19-12-2011 to date	Nil.
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	. A.B/29		1960	1978				· ·	SHO PS Tajo	ri 15	.03.2003 to 20.06.2003		
• <u>•</u> •					. :				SHO PS G.KI	hel 20	06.2003 to 12.07.2003		
-									SHO PS fajo	ri 12	.07.2003 to 18.12.2003		
	<u>•</u>					· .	,	•	SHO PS Naur		12.2003 to 15.04.2004		
al and a second							in the second		SHO PS [*] Pézu	~	.03.2005 to 06.07.2005	· ·	
e la companya de la compa							[SHO PS G.KI		.07.2005 to 29.09.2005		
							· · · ·		SHO PS Tajo		.10.2005 to 11.04.2006		
									SHO PS G.KI		.04.2007 to 27.10.2007		
							1		LBI Staff		3.11.2007 to 05.03.2008	· .,	
									SI PS Dadiwa		0.03.2008 to 05.10.2008		
					· · ·				SHO PS Pezu		.10.2008 to 30.06.2009		
									SHO PS Nau		.07.2009 to 05.08.2009	,	
			•	•					SHO PS G.KI	0	.08.2009 to 30.09.2009		
				·				•	I/C Inv PS Da		.11.2007 to 05.08.2008		
							!		C.O Inv HQrs		.03.2010 to 1210.2011		
				•					ISHO,PS Don	•	.10.2011 to 15.11.2011		
	1							• ·	Insp Police Li		.11.2011 to 16.05.2012		
	4), 1 -				-		1		Police Lines		.05.2012 to 01.10.2012	1	
	- 15 - 15 - 16			•					ISHO PS Hav		-10-2012 to 18-12-2012		
					-		1	· .	ISHO PS Sad		-02-2012 to 20-04-2013		
	4			•			· · · ·		Police Lines		.04.2013 to-date		
										,	AGO SB KPK Pesh:	· · · · · · · · · · · · · · · · · · ·	
21	SI Gul Janan No.1	Labelei	05.12.	02.09.197	16.06.2008.	10 th :	Nil.	31:05.2013	01.06.2008	16.11.2012	Enquiry Officer DPO	Nil	ļ
21	B/30.	Lakki.	1956.	5	10.00.2008.	10.	INII.	51.05.2015	19.01.2012	To-date.	Office Lakki		
				i			<u> </u>		25.03.2011	23.06/2011	SHO PS Dadiwala		
							1		13(10.2011	29.12.2011	SHO PS Pezu		
								, •	06.02.2012	15.02.2012	SHO PS Naurang		
	CI Maala I When		01.04	22 10 107					16.02.2012	27.03.2012	SHO PS Lakki		
22	SI Mashal Khan	Lakki.	01.04.	22.10.197	13.08.2009	10 th :	Nil.	31.05.2013.	04.09.2012	12.12.2012	SHO PS Pezu	Nil.	
	.B/31		1957	5.		• • •	· · ·		· · · · ·	10.01.2012	SHO PS G. Khel		
					•	· · ·	 . '		13.12.2012	23.01.2013	SHO PS G. Khel SHO PS Lakki	,	
									11.01.2013 01.02.2013	08.05.2013	SHO PS Lakki		
				<u> </u>	· · · · · · · · · · · · · · · · · · ·	·						<u> </u>	
									SHO PS Lake		02.2010 to 08.09.2010	;	
			0.000	01.02			· · ·	·	SHO P5 G.K		.09.2010 to 22.09.2010	· ·	
23.	SI Asad Ali Shah	Bannu	06-02-	01-03-	15.02.2010	BA.	Passed.	31.05.2013	SHO PS Nau		.09.2010 to 28.09.2011	х 2 м - 1	
	No.B/36		1987	2006			• •		SHO PS Lak		.06.2010 to 18.10.2012		
	,					, ,		. · · · ·	SHO,PS Tow	•	-12-2012 to 19-02-2013		
			<u> </u>			· · ·			SHO PS Cant		3-03-2013 to 15-04-2013		
	SI, Gul Mar Jan No.		05.10.	02.09.197			1	1	10.06.2010	11.08.2010	I/C DSB Staff Lakki	1	
24	B/34.	Lakki.	1956	5	15.02.2010	10 th :	Nil.	31.05.2013.	12.08.2010		SB KPK Peshawar	Nil.	ļ

	10	2										
						-			· · · · ·	SHO PS Basya Khel 13-	10-2011 to 26-11-2011	
ŀ	Č ·	SI Nabi Shah		08-08-	15-11-			· .	•	SHO PS Haved 26-	11-2011 to 07-02-2012	
4	25		Lakki	1963	13-11-	08.02.2011	10 th :	Passed.	31.05.2013	SHO PS Basya Khel 17-	05-2012 to 19-02-2013	Nil
<u> </u> †		No.B/37		1903	1981				•• • • •	'SHO PS Bakka Khel 19-	-02-2013 to 19-03-2013	
		· .			• • •					SHO PS Township 19-	03-2013 to date	· · · · ·
		CI Malanana J		10 11	00.02					I/C INV PS Haved 15-	07-2011 to 10-05-2012	
	26	SI Muhammad	Lakki	18-11-	09-03- 1983	30.09.2010	FCs .	Nil.	31.05.2013	Interment Center Lakki 10-	05-2012 to 18-06-2012	Nil.
		Amin No.B/32		1958	1983			•	·	Interment Center Swat 18-	06-2012 to date	•

It is submitted that the Recommendation Rolls on form 13.15 (1) and no pending departmental enquiry certificates in respect of the Police Officers, mentioned above at serial No. 2, 8 and 24 will be submitted , as and when are received from the concerned Quarters, please.

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(AZADKHAN)TST,PSP Regional Police Officer, Bannu Region, Bannu. 12 -1916-1

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CHARACTER COLL OF 6. APPOINTMENTS, PROMOTIONS, REDUCTIONS, DISCHARGES, ETC. 2 3 4 5 Appointed, Tacthored, suspended, reduced dischargen, dismissed, redgned or dieg To what grade and pay Date Full Signature of Super of Police No. of Appointed, promoted or reduced District Order Appaul as constalle at the 25p/ Im w/e 18 12 (A)-Pi as a constalite at ls 260/m w/e for Allocated This charact special pary of RSST-My arith End from 14 5 5 elerer Com LSpisemme 6. 10 for 1.1.1.1.1.1.1 New Sign the second second . 331-1381 23-01 4 12 Constille at R 2721. Pay W7ch as 158 is and the Als 228 Decare 10. No. 1.0.22 Date Rocreation Alles . For The est our | Gen. During give 12-5. planced and polyama J-R 2821 Du mep 1- ?- 87 ិ១ ខែ 146934 BANKE -17/2 TRANSFERS BEYOND THE DISTRICT--12-81 as Constille up a po Conferned. - 1981 11 1-Authority for tra Data From To Dress lest Decreption Allowance 1991 Vid - 0. No 1077 Dated 1990 - p all great `: trice i of Pollee. ader 1982 Ganna. W 17/2 45/2 Gaby - X 🗱

42 ORDER 0/R Promoted as off g. Head com ible in 3/-An , B.P.S. NO.7, (1480-81.2695) W/20 1394 5]p. Vide this office OBNO: 1842 oft 14.11.1. and his l'and fixed as the @ Rs 2209/- "I'M w/e from 13-11-94. S. Ban Re-fination of Pay on offering option. Beng Opted for Re-fixation of Pay as Head Coust: in RASDS-7 on 1-12- 1994 instead of 13-11-1994 (enclosed) his Pay is Re-spiced as Stead Congt: RBPS-7 on 1/2 @ RS. 2290/ Don as under: 1. Pay as Coust: BBS-5 on 12-11-94. . Rs. 2126/ PM 2. Day graced on brom otion as. He (RBBS-7) on 13 11 Rs. 2209/ PM 3. Pay alsindy due as Const. (RBPS-5)oni 12 Rs. 21921- PM 4. Pay Re-fixed as He (RBPS-7) on 1/2: Rs 2290/ pm. Superint : ident of Police

I do hereby certify that I have examined Mr. Mil Back glack Sto Machullah Klicen and can not discover that he had any disease communicable or other constitutional effection or bodily infirmity except I do not consider this as diqualification for employment in the office of the. fit for service 16.2 52. 13. 5. 5. 6A. O. 1 10 Bollies & F. C. Hospital Medical Superintendent LEFT HAND THUMB AND FINGER EGinth Hospital, IMPRESSIONS ... المراول المورث م __ سکالرشو، کاتشار __ __ کرتادیخ تک اداکیاگی رتفت جمرائي مدمو في في الم لمان فرسيك معينك وطف الم المورد المحدث ك مارتيكيت ك يعدونواست ودرم است ودر المست معدوم وق ك ايك اه حدا تعد يوق جاج - جمعد - المعتبون ف عُدل سكول كا ، متحان ديا جو- ايك ما ه يتيجر نطخة كامار ديخ سركنتا جا ستند فالمددة ولاف بعد ودر وجود في كما وشقيت كم يعمادى بي مديني فيس جارى بول اكردند الجماز في المراد في المراجل الدينة ما المفك كم يله وتواميت وي جارف توينة ما الميفك عرك - G & Star Band - طالمي تلم. -سب ولير ___ - كول _____ خلى ____ تاريس تيوزنه كاما رثينكيت لير ____ 12 مدكر يتاك ____ كول ___ خلى ___ ك ____ الحريم من من من من من



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FINAL CLASTIFICATION AND Po-مع الن إريد ب يترن متنوشق ired RS. 17.48 us Pollewing - نميرفاتل (1.1.1959) (1.1.1959) 5.00 AF. 0.48 L.C. 21/2 . کاشتک ریا بغیر کاشتک م 6.00 Q.... ا عدالا دمستامهسا تعامتين واكدى بيراحا يستابين مسيون يرجبا لكالها تام فالريكانيكا جازت دكا مثل 20 يعتموا الكركامتوان سك . بین 309 04. رَبَ } لي كيا قتارين ع<u>ليه الن بوا</u> حرَّن } لي كيا قتارين عن ع<u>ليه الن من من المنام</u> نين يون X ۲۵ ای دامتران ترق دینے کے بلیے برا : --- دی (سمن جون وندمی ا اس ندم رک دهم ون الدان مدارشیکیشون کے مطالق میں چران سے ان درسوں سے مامل کے ج للايسين ماخرى كمتنا للحرب متنى سال الماحرين ستخد كملكم ين في كاتن مکن ^{ای}ر این کا کار م کون تا ا 1.1.1 18 4 18 46 عدم ثما 94 \ 8.9.197 n 28/9/77 are - 1.00 1. E. M. 202 <u>مَدْمنون</u> م والزن کی ^{من}ورت م - سنا لرشب، کی متعلم ۔۔۔۔۔۔ - کس تاریخ تک اداکیا کی ۔۔۔ ر منسب جرباليد مدرم من الم يت ك، يد دو تواست دورسه منه مليمره بوت مكه ايك ٥٠ معدا عد بون جامية - به الادياجود إيك دادنتيج فطلن كاتاد تضعكنا جاجين الد، ک مادش کیف کمدید موازی بیان میبید تیس جار ۵ برگی ف در ز مارشنگیت که به دنواست دی جات ترسط مه _ ن مي طم ____ __ سکول __ <u>ر بابل</u> بن کنی - منبع --- ک . يحامت شادا بل ا

0-17 Jos man and and a که سترزمه بند دانی که اقتل^ا مناميني بين الب ولم من ب<u>ند</u> مشكل مفجرت وشرياني ك النقة م فيولي فابعد مند يى مان س - بيلة تعليم يا تى -9/77 : Sandie (7/ 9

لتشمله

و موجع الم

تاريخ

الم يترجب

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قم مرّ (مربر. لرسالي الجوا کمن در اس فوطش فام المارك المطبقات ا وسا کے معنوں فی مڈل سک ايك ما وكزر شدك ! اكرمندم بجنيعة زمار المجمع المين في -د في كما با ماي سكول A. 1- 5 -1. A

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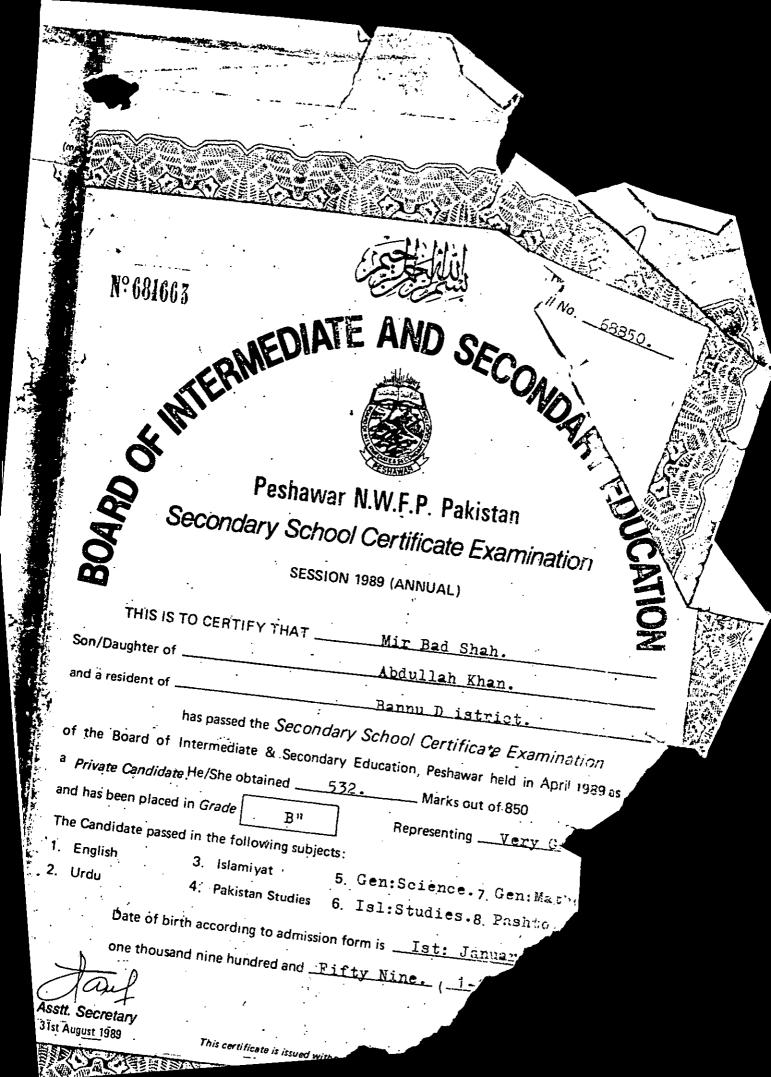
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لوتر سکول کورس پولیس نٹرینیک سکول مہنگو ہوست طری ست پر سط ليتجدمعه ورجيهان نام ____ ع مر 67/158 منبلغ تجرتي به منطع مسکونتی. . آغار کورسس اختتام کوتر ٤. ٠٥٢ امتحان • فأمشل ما*یک* بيهيل كحيليى تمضا سيزن . مامل کردی ک ىلىز كالأبخر حامل كرويتي ڈرک كواد ورل 20 <u>ہ</u>۔ 4 وروس .11 ۲٠ ۲. ۲ رائفن مشق 11 ۲. 4 -، كارد بحفرانش 12 ۲. ۲. ۵ بخيراسموكامقابله 7 15 1. ۲ فرینیک ۸ لامور سے مرال 19 14. ۲. 54 15 15 10 ۸ مسيکش فارميش ب_رو 25 ۳۰ • * ۹ بردمنتشركم ف دهنا ند 10 10 10 3400-1-1-60 ·ø-4 11 چندماري 28 ٨. ۸. ترار 41-50 Y A -330 قانون 213. Д, ا تفريرات باستان ادرممالطه فومدارى 67 57 1 + + 1 ... ۲ لوکن نید مسیش لاد ادر ایم شرمادت <u>rp</u>6 1... 1.4 3(4) 567122 م ملى كاروا في قدوبس 150 Se e-s به يونس مدكر 1... 1.SL 66 1... ۵ جنرلی کالج اور مشرایده ۲ فنگر بردسط اور میره کنیک جیوریس برردزمش 14+ ... 1.... .1... 83 60 Élis Átra لى يۇسى 150 750 575° 455 بتال صحت بستال *یں* دلوں کانقداد سر من **قراف**ت مارم واحل ادتجافي وجه راخله درّن A . ترس 6-أمدير 3/:10 مراعت بير (لما قريم ا

آدور بک بخرو تاریخ وجه النمام أبغ محي تفصيل Auss - 1, 200 آردر بک شرو تاریخ كمحاته كمسزا وجرمسيهل soup? تنفيل ار كل إيام رخصت وجہ No. pass of th Mar رائے کوئی کائل the beaus good character; Remanied in Touch Sand Courses the could be a good police officer. مرور المراري المراج مادي Citer House Quar Men & Baned أعلاق

Vie/Hingu Jor III - - - Unit of the first in itssued. Commandant Rief Hauge motification itssued. OF PROPIOIRIE TRATIFICATE P(N·W.F.P. POLICE Certified that 1218 BAD ار SUMM Constalle No. 582 (-BANNU - District) of N.W.F. Province Police, has passed the examination prescribed for Proficients and is fit to concuct the duties of that office. Marily oftimen. د. مسراد ر No. 8713-15 /Fg and hospegtor-Gersral of Police Dale 18/10 V V D. P. Penkon Peshawar. Touch

بحرالي منا-مروس المردم <u> 2013ء بنجانب</u> مبربي وشام بي بي او و سر مقذبه دعوكي ماعت تجريراً نكبه م، مدرجه مندرجه عنوان بالامين ابن طرف ۔ داسط بير دي دجواب دبي دکل کاردائي متعلقه آن مقام المشراح المكي عمر من ط المرد مع مقرركر سے اقراركيا جاتا ہے۔ كہ صاحب موصوف كومقد مدكى كل كاروائى كا كامل اختيار ; وگا۔ نيز وکیل صاحب کوراضی نام کرنے وتقرر ثالت ہ فیصلہ بر حلف دیتے جواب دہی اورا قبال دعوی اور بصورت ذكري كرني اجراءا درصولى جيك در ديبه ارعرضي دعوى اور درخواست مرتسم كي نقيديق ز این پردستنط کرانے کا اختیار ہوگا۔ نیز صورت عدم ہیردی یا ڈگری یکطرفہ یا ہیل کی برا مدگی ادرمنسونی یز دائز کرنے اپیل نگرانی دنظر ثانی و پیردی کرنے کا اختیار ہوگا۔از بصورت ضرورت مقدمہ مذکور یے کل باجزوتی کاردائی کے داسطے اور دکیل یا متار قانونی کواپنے ہمراہ پااپنے بجائے تقرر کا اختیار بهوكا اورصاحب مشرر شده كوبهى دبى جمله ندكوره بااختبارات حاصل ، ول مح اوراس كاسا خته پردا خت منظور قبول موگا-دوران متندمديس جوتر چدد مرجاندالتوات متندمد - سبب - وموگا-کوئی تاریخ بیش مقام دورہ پر ہویا حدے باہر ہونو وکیل صاحب یا بند ہوں کے کہ بیر دی بدكوركري _ لېدادكالت نامدكھديا كەسندر ب_ . 20 13. ______ ol المرتوم ____ ب المر یے لئے منظور ہے۔ plar. M. Pot

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA PESHAWAR Appeal No. 1660/2013

Mir Badshah Khan ,Sub Inspector No.B/25,Police Department ,District Bannu, Khyber Pakhtunkhwa Peshawar.

VERSUS 🥠

- 1) Government of Khyber Pakhtunkhwa, through Chief Secretary civil Secretariat, Peshawar.
- 2) The Provincial Police Officer Khyber Pakhtunkhwa Peshawar,
- 3) The Regional Police Officer, Bannu Region, Bannu,

(Respondents)

REPLY BY RESPONDENT NO.1,2 & 3

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:

- 1) That the appeal is not maintainable in its present form.
- 2) That the appellant has concealed the material facts from the Honorable. Tribunal:
- **3)** That the appeal of appellant is time barred.
- 4) That the appeal is not maintainable as the appellant has no cause of action.
- 5) That the appellant has no locus standi to file the appeal.
- 6) That the appellant has been estopped by his own conduct to file the appeal.

OBJECTIONS ON FACTS:

- 1) Pertains to record.
- Correct to the extent that the appellant was confirmed as constable 2) on 01.11.1981, confirmed as Head Constable w.e.f 13.11.1996 and promoted as ASI on 18.11.2004.
- 3) Correct to the extent that he was given special case/out of turn to the substantive rank of ASI vide Notification dated 27.10.2008 which was declared illegal by the No.10041 Apex Supreme Court of Pakistan in CRL original petition No 89/2011.
- 4) Pertains to record.
- 5) Pertains to record.
- 6) Pertains to record, however on account of good performance, the competent authority has granted different cash rewards and certificates to the appellant. Copy & annexed as annexure "A".
- 7) The appellant has achieved out of turn/special case promotion over his senior colleagues for sufficient long period but the same was declared illegal and void by the Apex Supreme Court of Pakistan and the same order was implemented against the officials who have achieved out of turn promotion in the Bannu Region. The order dated 0.08.2013 and **6**.09.2013 are annexed "B" and "C".
- Incorrect. The order passed by the respondent is justified and in 8) accordance with the Apex Court's judgment and seniority list.

OBJECTIONS ON GROUNDS.

- Incorrect. The order is based on facts, merits and in accordance (A) with the judgment of the Supreme Court of Pakistan.
- Incorrect. The case of appellant is not different from the facts **(B)** explained in the judgment of Apex Court which was conveyed to all departments in the country for compliance.
- Incorrect. Special case and out of turn promotion are same which (C) have been declared illegal by the Apex Court. An officer can not supersede his senior colleague by means of special case or out of turn promotion.

- (D) Incorrect. There is no need of issuing notice because the matter has been declared illegal by the Highest Court of the country and its compliance is binding on all departments. In the light of judgment and directions from high ups, the appellant and other officials were demoted to their Substantive rank of HC/OASI.
- (E) Incorrect. The appellant was given out of turn/special case promotion in the light of standing/circular orders on account of good performance but the same was withdrawn and he was awarded a lot of cash rewards and certificates.
- (F) Incorrect. The impugned order is in accordance with law and passed in implementation of the orders of Supreme Court.

Prayer:

In view of the above facts and circumstances, it is humbly prayed that appeal of appellant, being not maintainable, may kindly be dismissed with costs.

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

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar (Respondent No.2)

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Regional Police Officer, Bannu Region, Bannu. (Respondent No.3)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA PESHAWAR Appeal No. 1660/2013

Mir Badshah Khan ,Sub Inspector No.B/25,Police Department ,District Bannu, Khyber Pakhtunkhwa Peshawar.

VERSUS

- 1) Government of Khyber Pakhtunkhwa, through Chief Secretary civil Secretariat, Peshawar.
- 2) The Provincial Police Officer Khyber Pakhtunkhwa Peshawar,
- 3) The Regional Police Officer, Bannu Region, Bannu,

(Respondents)

COUNTER AFFIDAVIT

We the following respondents, do hereby solemnly affirm and declare that the contents of the attached para wise comments are true and correct to the best of our knowledge and belief and nothing has been with held or concealed from this Honorable Tribunal.

Alle

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

Provincial Police Officer, Khyber PakhtunKhwa, Peshawar (Respondent No.2)

Alc/L

mm Regional Police Officer,

Bannu Region, Bannu. (Respondent No.3)

List	R	<u>R</u> S <u></u> WARDS
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S/No	Award CC	Cash	No and Dated	Performance	Authority by whom awarded
1.	CC-I	Rs.2000/-	DPO Bannu Dy: No. 6743 dated 01.11.2010	For effective intelligence collection of Miscreants and Criminal.	(Fiaz Ahmed Khan Toru) Provacnial Police Officer, KPK, Peshawar
2	CC-II	Rs. 2000/-	No. 117/PA dated 12.01.2010	Collected good and valuable information about the criminals	(Mohd: Masood Khan Afrid æ) RPO, Bannu Region, Bannu
3.	CC-II	Rs. 3000/-	No.4077 dated 11.11.2009	Collected good and valuable information about the criminals	(Mohd: Masood Khan Afridai) RPO, Bannu Region, Bannu
4.	CC-II	Rs.2000/-	No. 637/PA dated 01.03.2010	Collected good and valuable information about the criminals	(Mohd: Masood Khan Afridai) RPO, Bannu Region, Bannu
5.	CC-II	Rs. 2000/-	2065 dated	Collected good and valuable information about the criminals	(Mohd: Masood Khan Afridai) RPO, Bannu Region, Bannu
6. ·	CC-II	Rs. 1000/-	2209/PA dated 04.08.2010	Arrest of suspect Bahadur s/o Mohd: Ali Jan r/o Gillgat presently Mandi Bahaudin, Abid Hussain s/o	(Mohd: Masood Khan Afridai) RPO, Bannu Region, Bannu
	· · · · ·	- · ·		Faizullah Khan r/o Jandho Khel and also arrest a member of Al-Qaida organization namely	
• • •				Muhammad s/o Saummair r/o Iraq Bughdad(foreigner) in Bism Ullah Jan Hotel Bannu	
·		·		City.	•
7.		Rs.10/-	OB No. 1777 dated 05.07.1979	For found in clean dress in magazine	(Hidayatullah Khan) Superintendent of Police, Bannu
8.	CC-III	Rs. 10/-	OB No. 1859 dated	For good performance in case FIR No. 65 dated	(Hidayatullah Khan)

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			15.07.1979	13.07.1779 u/s 302/404/34 PPC PS Mirian.	Superintendent of Police, Bannu.
9.	CC-III	Rs. 15/-	OB No. 2327 dated 29.09.1979	For good turnout and cleanliness during the General parade.	(Mr. Noor Muhammad Khan) Superintendent of Police, Bannu.
10.	CC-III	Rs. 15/-	OB No. 1315 dated 21.08.1979	For good work and performance during posting in PS Naurang.	(Mr. Noor Muhammad Khan) Superintendent of Police, Bannu.
11.	CC-III	Rs. 15/-	OB No. 588 dated 08.03.1980	For good performance during the General Parade at Peshawar Police Lines on 29.12.1979.	(Mr. Noor Muhammad Khan) Superintendent of Police, Bannu.
12.	CC-III	Rs. 20/-	OB No. 1311 dated 25.05.1980	For good performance during the visit of DIG, DI Khan to Bannu District.	(Mr. Noor Muhammad Khan) Superintendent of Police, Bannu.
13.	CC-III	Rs. 10/-	OB No. 2334 dated 18.10.1980	Extra ordinary duty during the visit of president of Pakistan and Governor NWFP to DI Khan District.	(Mr. Noor Muhammad Khan) Superintendent of Police, Bannu.
14.	CC-III	Nil	OB No. 2583 dated 24.11.1980	Good performance during the visit of IGP, NWFP, Peshawar to District Bannu.	(Mr. Noor Muhammad Khan) Superintendent of Police, Bannu.
15.	CC-III	Rs. 25/-	OB No. 143 dated 21.01.1982	Good work in case FIR No. 24 dated 19.01.1982 u/s 419/420/467/468/471 PPC PS City.	(Sayed Irshad Hussain) Superintendent of Police, Bannu.
16.	CC-III	Rs. 30/-	OB No. 835 datèd 08.04.1982	For good work in case FIR No. 23 dated 10.01.1982 u/s 13AO PS Saddar/	(Sayed Irshad Hussain) Superintendent of Police, Bannu.
17.	CC-III	Rs. 05/-	OB No. 457 dated 27.02.1982	For good turnout during general parade in Police Lines, Bannu.	(Sayed Irshad Hussain) Superintendent of Police, Bannu.
. 18.	CC-III	Rs. 05/-	OB No. 427 dated	For good turnout during general parade in Police	(Sayed Irshad Hussain)

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		·	09.05.1982	Lines, Bannu.	Superintendent of Police, Bannu.
19.	CC-III	Rs. 05/-	OB No. 257 dated 06.02.1982	For good turnout during general parade in Police Lines, Bannu.	(Sayed Irshad Hussain) Superintendent of Police, Bannu.
20.	CC-III	Rs. 30/-	OB No. 3276 dated 01.12.1982	For good turnout during the visit of IGP, NWFP, Peshawar to Bannu District.	(Masood Ahmad Khan) Superintendent of Police, Bannu.
21.	CC-III	Nil	OB No. 866 dated 21.04.1981	Good work in case FIR No. 76 dated 06.04.1981 u/s ³ / ₄ PHO.	(Noor Muhammad Khan) Superintendent of Police, Bannu.
22.	CC-III	Rs. 20/-	OB No. 707 dated 20.032.1981	Good work in case FIR No. 21 dated 26.02.1981 u/s 13AO PS Mirian.	(Noor Muhammad Khan) Superintendent of Police, Bannu.
23.	CC-III	Rs. 15/-	OB No. 566 dated 04.03.1981	Good work during the visit of DIG, DI Khan to Bannu District.	(Noor Muhammad Khan) Superintendent of Police, Bannu.
24.	CC-III	Nit	OB No. 445 dated 22.02.1981	Good work during the arrest of gamblers.	(Noor Muhammad Khan) Superintendent of Police, Bannu.
25.	CC-III	Rs. 05/-	OB No. 1905 dated 08.08.1981	For good turnout during general parade in Police Lines, Bannu.	(Sayed Irshad Hussain) Superintendent of Police, Bannu.
26.	CC-III	Rs. 05/-	OB No. 1799 dated 27.07.1981	Good work in case FIR No. 145 dated 27.07.1981 u/s 353/307/34 PPC PS Naurang.	(Sayed Irshad Hussain) Superintendent of Police, Bannu.
27.	CC-III	Rs. 30/-	OB No. 825 dated 10.04.1983	Good work in case FIR No. 333 dated 11.11.1982 u/s 13AO	(Masood Ahmad Khan) Superintendent of Police, Bannu.
28.	CC-III	Rs. 10/-	OB No. 3125 dated	Good performance during the Eid-Milad-U-Nabi	(Khurshid Alam)

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			19.12.1983	duty on 18.12.1983.	Superintendent of Police, Bannu.
29.	CC-III	Rs. 25/-	OB No. 1061 dated 14.05.1984	Good work in case FIR No. 42 dated 25.01.1984 u/s 13AO and Case FIR No. 157 dated 24.02.1984 u/s 4PHO.	(Khurshid Alam) Superintendent of Police, Bannu.
30.	CC-III	Rs. 15/-	OB No. 1010 dated 08.05.1984	Good work and detached five cases local and SPL four in PS City.	(Khurshid Alam) Superintendent of Police, Bannu.
31.	CC-III	Rs. 20/-	OB No. 2281 dated 10.10.1984	Good work during the Moharram Sharif duty as well as the visit of Governor NWFP, to this District.	(Ghulam Sarwar Khan) Superintendent of Police, Bannu.
32.	CC-III •	Rs. 20/-	OB No. 2449 dated 21.10.1984	Good work during the visit of IGP, NWFP, Peshawar to this District.	(Ghulam Sarwar Khan) Superintendent of Police, Bannu.
33 .	CC-III	Rs. 20/-	OB No. 2783 dated 24.11.1984	Good work during the formal inspection DIG, DI Khan to Bannu District.	(Ghulam Sarwar Khan) Superintendent of Police, Bannu.
34.	CC-III	Rs. 20/-	OB No. 2782 dated 24.11.1984	Good work during the house on fire.	(Ghulam Sarwar Khan) Superintendent of Police, Bannu.
35.	CC-III	Rs. 20/-	OB No. 3030 dated 27.12.1984	Good performance during the Referendum and visit of Present of Pakistan to DI-Khan Range.	(Ghulam Sarwar Khan) Superintendent of Police, Bannu.
36.	CC-III	Rs. 20/-	OB No. 155 dated 19.01.1986	Good duty during the visit of Governor and IGP, NWFP to Bannu District.	(Ghulam Sarwar Khan) Superintendent of Police, Bannu.
37.	CC-III	Rs. 25/-	OB No. 153 dated 19.01.1985	Good duty during the visit of IGP, NWFP to this District.	(Ghulam Sarwar Khan) Superintendent of Police,

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48.	CC-III	Rs. 50/-	OB No. 2200 dated 12.08.1985	Good turnout during the inspection of IGP, NWFP Peshawar to the PS Naurang.	(Hidayat Ullah Khan) Superintendent of Police, Bannu.
49.	CC-III	Rs. 10/-	OB No. 2383 dated 16.09.1985	Good turnout/	(Hidayat Ullah Khan) Superintendent of Police, Bannu.
50.	CC-III	Rs. 25/-	OB No. 3018 dated 08.12.1985	Good duty during the visit of Prime Minister to NWFP, Peshawar.	(Hidayat Ullah Khan) Superintendent of Police, Bannu.
51.	CC-III	Rs. 50/-	OB No. 1084 dated 12.05.1986	Good turnout as well as good discipline during the Inspection of Police Lines, Bannu on 11.05.1986.	(Faiz Ahmad Khan Turo) Superintendent of Police, Bannu.
52.	CC-III	Rs. 50/-	OB No. 1272 dated 05.06.1986	Good work	(Faiz Ahmad Khan Turo) Superintendent of Police, Bannu.
53.	CC-III	Rs. 15/-	OB No. 1419 dated 26.06.1986	Good turnout during the Magazine Guard on 21.06.1986.	(Faiz Ahmad Khan Turo) Superintendent of Police, Bannu.
54.	CC-III	Rs. 25/-	OB No. 359 dated 14.02.1987	Good turnout during the General Parade on 07.02.1987.	(Faiz Ahmad Khan Turo) Superintendent of Police, Bannu.
55.	CC-III	Rs. 50/-	OB No. 253 dated 31.01.1987	Good turnout during the Magazine Guard.	(Faiz Ahmad Khan Turo) Superintendent of Police, Bannu.
56.	CC-III	Rs. 25/-	OB No. 259 dated 31.01.1987	Good turnout during the general parade at Police Lines, Bannu.	(Faiz Ahmad Khan Turo) Superintendent of Police, Bannu.
57.	CC-III	Rs. 25/-	OB No. 2675 dated 29.12.1986	Good work during the visit of IGP, NWFP to the Bannu District.	(Faiz Ahmad Khan Turo) Superintendent of Police,

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					Bannu.
58.	CC-III	Rs. 20/-	OB No. 899 dated 25.05.1987	Good performance of his duty.	(Faiz Ahmad Khan Turo) Superintendent of Police, Bannu
59.	CC-III	Rs. 20/-	OB No 1624 dated 21.10.1987	Good duty looking keen interest in PS Work duty the Posting.	(Faqir Husssain) Superintendent of Police, Bannu.
60.	CC-III	Rs. 50/-	OB No. 2872 dated 26.11.1988	During the General Elections	(Muhammad Sharif Virk) Superintendent of Police, Bannu.
61.	CC-III	Rs. 400/-	OB No. 726 dated 20.06.1989	Good performance of his duty during the Bizen Khel operation.	(Muhammad Akhbar Khan) Superintendent of Police, Bannu.
62,	CC-III	Rs. 200/-	OB No. 400 dated 30.06.2008	Arrest of PO Afsar Ali wanted in case u/s 302/34 PPC PS Kakki.	(Muhammad Alam Shinwari) District Police Officer, Bannu
63.	CC-III	Rs. 200/-	OB No. 381 dated 23.06.2008	Arrest of PO Muhammad Ghafoor wanted in case FIR No. 212/2007 u/s 302/34 PPC PS Cantt:	(Muhammad Alam Shinwari) District Police Officer, Bannu
64.	CC-III	Rs. 200/-	OB No. 690 dated 23.09.2008	Arrest of PO Ali Ghohar wanted in case u/s 302/34 PPC PS Saddar.	(Muhammad Alam Shinwari) District Police Officer, Bannu
65.	CC-III	Rs. 500/-	OB No. 657 dated 11.09.2008	Arrest of PO Mehmood khan in Degree College, Bannu involved in Murder case.	(Muhammad Alam Shinwari) District Police Officer, Bannu
66.	CC-III	Rs. 200/-	OB No. 565 dated 22.08.2008	An information conveyed by SHO City that one suspect Motor Car bearing No. 6689/MNA, Black Color entered in the City area. The Motor Car taken into possession in GTS, Chowk.	(Muhammad Alam Shinwari) District Police Officer, Bannu
67.	CC-III	Rs. 200/-	OB No. 400 dated 30.06.2008	Arrest of PO Afsar Ali wanted in case FIR No u/s 302/34 PPC PS Kakki.	(Muhammad Alam Shinwari) District Police Officer, Bannu
68.	CC-III	Rs. 200/-	OB No. 381 dated 23.06.2008	Arrest of Muhammad Ghafoor wanted in case FIR No. 212/2007 u/s 302/34 PPC PS Cantt: •	(Muhammad Alam Shinwari) District Police Officer, Bannu

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CC-III	Rs. 200/-	OB No. 690 dated 23.09.2008	Arrest of PO Ali Ghauhar Shah r/o Sheikhan wanted in case FIR No u/s 302/34 PPC PS Saddar Bannu.	(Muhammad Alam Shinwari) District Police Officer, Bannu
CC-III	Rs. 500/-	OB No. 657 dated 11.09.2008	Arrest of PO Muhammad Khan wanted in case FIR No u/s 302 PPC PS Kakki.	(Muhammad Alam Shinwari) District Police Officer, Bannu
CC-III	Rs. 200/-	OB No. 496 dated 02.08.2008	Arrest of PO wanted in case FIR No u/s 302/34 PPC PS Kakki.	(Muhammad Alam Shinwari) District Police Officer, Bannu
CC-III	Rs. 500/-	OB No. 112 dated 03.02.2009	During DPC meeting for promotion as Sub- Inspector as good performance regarding the information against anti social elements.	(Muhammad Alam Shinwari) District Police Officer, Bannu
CC-III	Rs. 500/-	· · ·	During the DPC meeting held on 16.01.2009 awarded for good information conveyed about the POs.	(Imran Shahid) District Police Officer, Lakki
CC-III	Rs. 300/-	OB No. 83 dated 23.01.2009	Arrest of PO Khan Bahadur s/o Khanza r/o Chah Gari Mamash Khel wanted in Case FIR No dated u/s 302/324/34 PPC PS Cantt:	(Muhammad Salim Marwat) District Police Officer, Bannu.
CC-III	Rs. 500/-	OB No. 502 dated 13.04.2009	Arrest of PO Nasib Ullah s/o Sakhi Zaman cast Murib Khel r/o Bakka Khel wanted in case FIR No. 16 dated 19.03.2006 u/s 302/324/34 PPC PS Bakka Khel.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
CC-III	Rs. 500/-	OB No. 545 dated 22.04.2009	Arrest of PO Miral alias Zamaray r/o Bakka Khel wanted in case FIR No. 43 dated 19.04.2009 u/s 324/353/34 PPC PS Bakka Khel.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
CC-III	Rs. 1000/-	OB No. 1065 dated 26.06.2009	For his valuable performance during the Government duty.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
CC-III	Rs. 1000/-	OB No. 1064 dated 26.06.2009	For his valuable performance during the Government duty.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
CC-III	Rs. 500/-	OB No. 473 dated 13.06.2009	Awarded by DPO/Lakki for his good performance during the Govt: duty.	(Imran Shahid) District Police Officer, Lakki
		10.00.2000		

		·			
			06.07.2009	Mohammad Ali s/o Gul Mir r/o Murib Khel Bakka	District Police Officer, Bann
			· ·	Khel wanted in case FIR No. 128 dated	
			· .	02.08.2007 u/s 419/420/468/471 PPC PS Bakka	
				Khel and arrested.	
81.	CC-III	Rs. 500/-	OB No. 1180 dated	Convey timely information about the snatched	
			27.07.2009	Motor Car white color bearing No. 241/AFX from	District Police Officer, Bann
			· · ·	one Late Saeed Nawaz s/o Saeed Rehman r/o	
			• · · ·	Shah Baz Azmat Kheh PS Saddar and arrested	•
			· · ·	by the local Police of PS Mirian.	
82.	CC-III	Rs, 500/-	OB No. 1297 dated	Good information conveyed about the wanted	(Muhammad Iqbal Marwat
			18.08.2009	PO Roshan s/o Wasay Khan r/o Saidgi Bakka	District Police Officer, Bann
				Khel involved in case FIR No. 214 dated	
	·		· · ·	01.07.2003 u/s 9CNSA PS Cantt: and arrested.	
83. ၂	, CC-III	Rs. 500/-	OB No. 1335 dated	Good information conveyed about the POs	(Muhammad Iqbal Marwat
			19.08.2009	involved in case FIR No. 12/2009 u/s 302/324/*	District Police Officer, Bann
				³ / ₄ ESA /7ATA PS Kakki where Nazim Khairullah	
0.4				embraced Shahadat.	(Muhammad Jahal Maruat
84.	CC-III	Rs. 500/-	OB No. 1349 dated	Arrested wanted PO Hukam Zad s/o Qar Jan r/o	the second se
			22.08.2009	Bakka Khel involved in Case FIR No. 104/98 u/s	District Police Officer, Bann
0 -		D. 100/		302/324/34 PPC PS Mirian.	(Muhammad Igbal Marwat
85.	CC-III	Rs. 100/-	OB No. 1357 dated	Arrested the wanted PO involved in case FIR	District Police Officer, Bann
			22.08.2009	No. 36 dated 20.07.2009 u/s 302/324/427/ 34ESA /7ATA PS Haved.	District Fonce Officer, Bann
86.			OB No. 1365 dated	Arrested the wanted PO involved in Case FIR	(Muhammad Iqbal Marwat
00.	CC-III	Rs. 200/-	25.08.2009	No. 117 dated 05.09.2000 u/s 324/148/149	District Police Officer, Bann
	00 111		23.08.2003	PPC PS Bakka Khel.	District Fonce Officer, Dum
87.	CC-III	Rs. 200/-	OB No. 1513 dated	Arrest PO Zahid Ullah alias Zadalay s/o Sadam	(Muhammad Iqbal Marwat
		1\3, 200/-	16.09.2009	alias Gulay r/o Jaman Gul wanted in case FIR	District Police Officer, Bann
			10.09.2009	No. 88 dated 07.06.2009 u/s 302/148/149PPC	
				PS Domel.	•

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88.	CC-III	Rs. 100/-	OB No. 1498 dated 14.09.2009	Recovered 12 Packets of Machis Bomb during the Govt: duty at Jahanzeb Street PS City.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
89.	C <u>C</u> -III	.Rs. 500/-	OB No. 1519 dated 17.09.2009	On the direction of RPO, Bannu Region vide his order Enst: No. 3356/PA dated 14.09.2009 for good performance during the Govt: duty awarded by the DPO/Bannu.	District Police Officer, Bannu.
90.	CC-III	Rs. 1000/-	OB No. 1531 dated 24.09.2009	Arrested PO wanted to the local Police Of PS Domel.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
91.	CC-III		OB No. 1537 dated 25.09.2009	Arrested PO Asghar alias Asif s/o Gul Nawaz r/o Pathak Bakka Khel wanted in case FIR No. 163 dated 19.12.1994 u/s 353/186/189/506/148/ 149 PPC PS Bakka Khel.	District Police Officer, Bannu.
92.	ÇCC-III	Rs. 1000/-	OB No. 1585 dated 05.10.2009	Extra ordinary performance during the Government duty in District Bannu.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
93.	CC-III	Rs. 1000/-	OB No. 1752 dated 04.11.2009	Extra ordinary performance during the Government duty in District Bannu.	District Police Officer, Bannu.
94.	CC-III	Rs. 500/-	OB No. 1770 dated 11.11.2009	Arrested PO Laiq Zaman s/o Wali Zaman r/o Naray Pull and recovered one Knife from him and assign to PS Saddar.	
95.	CC-III	Rs. 200/-	OB No. 1837 dated 24.11.2009	Good performance during Govt: duty in case FIR No. 333 dated 27.10.2009 u/s 324/34 PPC PS Cantt:	
96.	CC-III	Rs. 500/-	OB No. 1854 dated 26.11.2009	Good information convey to the officers during his posting as Incharge DSB and awarded in DPO meeting with SDPOs and SHOs.	
97.	CC-III	Rs. 1000/-	OB No. 1876 dated 03.12.2009	Valuable performance as Incharge DSB.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
98.	CC-III	Rs. 500/-	OB No. 1932 dated 12.12.2009.	Valuable performance as Incharge DSB.	(Muhammad Iqbal Marwat) District Police Officer, Bannu.
99.	CC-III	Rs: 1000/-	OB No. 65 dated	Extra ordinary performance during posting as	(Muhammad Iqbal Marwat)
		· .			

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		· · · · · · · · · · · · · · · · · · ·	11.01.2010	Incharge DSB.	District Police Officer, Bannu.
		Do 1000/	OB No. 46 dated	Extra Ordinary performance during the Govt:	(Kifayat Ullah Khan)
100.	CC-III	Rs. 1000/-	02.03.2010	duty in District Bannu.	SP/Investigation Bannu.
		Do 1000/	OB No. 391 dated	Valuable performance as Incharge DSB.	(Muhammad Iqbal Marwat)
101.	CC-III	Rs. 1000/-	24.03.2010.		District Police Officer, Bannu.
		Rs. 1000/-	OB No. 161 dated	Valuable performance as Incharge DSB.	(Kifayat Ullah Khan)
102.	CC-III	RS. 1000/-	03.04.2010		SP/Investigation Bannu.
100		Rs. 500/-	OB No. 1559 dated	Valuable performance in arrest of pick picketer	(Mr. Ayub Khan)
103	CC-III	KS. 500/-	22.03.2010	namely Shadab s/o Yousaf cast Marwat and	District Police Officer, Lakki.
		•	22.00.2010	already involved in a criminal case vide FIR NO.	
	-			488 dated U/s 454/380 PS Lakki.	(Mr. Cajiad Khan)
104	CC-III	Rs. 500/-	OB No. 385 dated	As per the direction of RPO, Bannu Region,	(Mr. Sajjad Khan) District Police Officer, Bannu.
104.		KS. 300/	16.04.2010.	awarded by the DPO. Bannu for valuable	District Police Officer, Barna
		-		performance in arrest of PO Shanaz Khan s/o	
				Falak Sher r/o Mira Khel involved in case FIR	
				No. 23 dated 21.01.2007 u/s 13AO/7SIAA /	
			·	HS786/ PS Ghoriwala.	(Kifayat Ullah Khan)
105.	CC-III	Rs. 1000/-	OB No. 87 dated	Tracing out unknown accused/criminals and well	SP/Investigation Bannu.
105.			17.05.2010.	information conveyed to Investigation Officers.	(Kifayat Ullah Khan)
106.	CC-III	Rs. 1000/-	OB No. 100 dated	Tracing out unknown accused/criminals and well	SP/Investigation Bannu.
			08.07.2010	information conveyed to Investigation Officers.	
107.	CC-III	Rs. 1000/-	OB No. 122 dated	Tracing out unknown accused/criminals and well	SP/Investigation Bannu.
			27.07.2010	information conveyed to Investigation Officers. Tracing out unknown accused/criminals and well	
108.	CC-III	Rs 1000/-	OB No. 132 dated	information conveyed to Investigation Officers.	SP/Investigation Bannu
			23.08.2010.	Valuable and extra ordinary performance as	(Mr. Sajjad Khan)
109.	CC-III	Rs. 1500/-	OB No. 1031 dated		District Police Officer, Bannu.
			08.09.2010	Incharge DSB. Tracing out unknown accused/criminals and well	(Kifayat Ullah Khan)
110.	CC-III	Rs. 1000/-	OB No. 140 dated	information conveyed to Investigation Officers.	SP/Investigation Bannu.
			09.09.2010		

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	CC-III	R's.500/-	•	OB No. 1196 darted 2.11.2010	Arrest of PO u/s 302/148/149 PS Mirian.	(Sajjad Khan) DPO, Bannu
.2	CC-III	Rs.2000/		OB NO. 1274 dated 23.11.2010	Arrest of accused Namely Abid and recoverd two Kalashankove china made.	(Sajjad Khan) DPO, Bannu
13	CC-III	Rs.1000/-		Invst: OB No. 32 dated 22.02.2011	For valuable and extra performance in Govt: Duty.	(Kifayat Ullah) • SP/Investigation, Bannu
.14	CC-III	Rs.1000/-		OB No. 519 dated 10.5.2011	Arrest of PO namely Mohd: Ayaz u/s 302/34 PS Haved.	(Sajjad Khan) DPO, Bannu
115	CC-III	Rs.1000/-		OB No. 32 dated 22.2.2011	For good investigation.	SP/Investigation, Bannu
116	CC-III	Rs. 1000/-		OB No. 37 dated 23.2.2011	For good performance in untraced cases.	SP/Investigation, Bannu
117	CC-II	Rs. 5000/-		Order Endst: No: 3338 dated 2.6.2011	Good and valuable information.	(Ifthikhar Khan) RPO, Bannu Range, Bannu.
118	CC-III	Rs.1000/-,		OB No. 118 dated 16.6.2011	Good and valuable performance in Govt: Duty.	` (Sajjad Khan) DPO, Bannu
1-19	CC-II	Rs.2000/		Order Endst: No. 2076/PA dated 27.7.2011	Good performance in case FIR No. 429 dated 22.7.2011 u/s 324/13 AO/34 PPC PS City, FIR No. 430 dated 22.7.2011 u/s 324/34/13AO and arrest accused on the spot.	(Ifikhar Khan) RPO. Bannu Region, Bannu
120	CC-III	Rs.1000/-		OB No. 157 dated 30.7.2011	Good performance in Govt: Duty.	SP/Investigation, Bannu
121	CC-II	Rs. 5000/-	-	Order Endst: No. 2447/PA dated 21.9.2011	Good performance in govt: Duty.	(Feroze Shah) RPO. Bannu Region, Bannu
122	CC-III	Rs. 1000/-	-	OB No. 1164 dated 11.10.2011	Timely information about planted Bomb in the house of Noor Ali s/o Alam Khan R/o Mandew PS Mirian.	DPO, Bannu
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123	CC-III	Rs. 2000/	OB No. 1528 dated	Valuable and extra performance in Govt: duty.	DPO, Bannu
124	CC-III	Rs. 1000/-	OB No. 235dated 12.12.2011	For good information and good performance in Govt: duty.	SP/Investigation, Bannu
125	CC-III	Rs.1000/-	OB No. 236 dated 16.12.2011	Good information and Valuable performance in Govt: duty.	SP/Investigation, Bannu.
126	CC-II	Rs. 5000/	Order Endst: No. dated 18.1.2012	For good information and good performance in Govt: duty	(Feroze Shah) RPO, Bannu Region, Bannu
27	CC-III	Rs. 1000/-	OB No. 245 dated 29.12.2011	For good information and good performance in Govt: duty	SP/Investigation, Bannu
128	CC ₄ II	Rs.500/-	Dated 19.1.2012	Valuable and good performance in Govt: daty	RPO, Bannu Range, Bannu
129	CC-III	Rs.1000/-	OB No. 34 dated 23.1.2012	Valuable and extra performance in Govt: duty	(Raqiaz Khan) SP/Investigation, Bannu.
130	C-II	Rs5000/-	Dated 22.22.2012	Valuable and extra performance in Govt: duty	(Feroze Shah) RPO, Bannu Region, Bannu
131	C-III	Rs.	OB No. 225 dated 3.3.2012	Good performance in Govt: duty.	DPO, Bannu
132	C-III	Rs.2000/-	OB No. 560 dated 315.2012	Taking keen interest in conveying of information regarding militants/ miscreants and POs to the Police Deptt	(Waqar Ahmed) DPO, Bannu
133	C-III	Rs.2000/-	OB No. 620 dated 25.6.2012	Good performance in Govt: duty.	(Waqar Ahmed) DPO, Bannu
134	C-III	Rs. 500/-	OB No. 788 dated 13.8.2012	Good information and Valuable performance in Govt: duty.	(Waqar Ahmed) DPO, Bannu
135	C-III	Rs.1000/-	OB No. 168 dated 09.08.2012	Good and extra ordinary performance in Govt: Duty and specially in case FIR No. 274 dated 5.4.2012 u/s 382/392 PPC PS City whereas recovered	DPO, Bannu

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				· Rs.7900000/-	
136	C-III	Rs.1000/-	OB No. 204 dated	Valuable and extra ordinary performance in	(Raqiaz Khan)
		• • • • • •	25.10.2012	investigation of case FIR No. 710 dated 2.9.2011 u/s 9CNSA PS City. The accused Mir Qad Ayaz is	SP/Investigation. Bannu.
	¢	<i>n</i>		hereby convicted under Section 9(B) CNSA by	
	; ·	· · ·		sentenced to one year rigorous imprisonment along	
	е ч 	· · ·		with fine Rs.10000/- by the court of ASJ-I, Bannu	
	1			Liaquat Ali Khan dated 7.9.2012	•
137	C-III	Rs.1000/-	OB No. 175 dated	Good performance in recovery of 334 Bottles	(Waqar Ahmmad)
		•	11.02.2013	Alokohal vide case FIR No. 114 dated 10.02.2013 u/s	DPO. Bannu
			· · · · · · · · · · · · · · · · · · ·	³ ⁄ ₄ Article PS City Bannu	
138	C-III	, .	OB No. 198 dated	For good performance his keen interest in conveying	(Waqar Ahmmad)
		n an	18.02.2013	of information regarding militants / miscreants and P.Os.	DPO. Bannu

prepared from the Service grecord-& attested

Muspectiv Legal.

Amnexune B,

From: - The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

To: - The All Regional Police Officers, Khyber Pakhtunkhwa. No. <u>2357-65</u>/Legal dated Peshawar the <u>-658-</u>/2013

Subject: - OUT OF TURN PROMOTION. Memo

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The issue of out of turn promotion was discussed threadbare in a meeting chaired by the undersigned held on 29.07.2013.

As directed earlier that whoever displayed outstanding performance, he may be awarded cash reward and other monetary benefits while out of turn promotion were completely banned because behind such exercise favouritism and nepotism cannot be ruled out on one hand and heart burning of his colleagues and legal complication on the other.

The Honorable Supreme Court of Pakistan vide its Judgment in CRL Original petition No.89/2011 etc has also held out of turn promotion as illegal, violative of Article of the constitution, Law & Rules.

In compliance with the above directions Peshawar Police demoted those Officers/Officials who were promoted out of turn and this practice was appreciated and declared in accordance with Law, Rules and dictum of the Apex Court. Regarding out of turn promotion of fourteen officers in Mardan Region, it was directed that such promotions should be cancelled immediately.

In addition to the above it is also directed that all Police Units and field formation commanders should by following the analogy of the decision of the Apex Court and as well as action taken by the Peshawar Police, they should cancel the out of turn promotion if any. In this regard the RPO's, District Police Officers, Police Units and field formation commander are directed to submit report within 07) days showing demotion of the Police Officers/Officials who were given out of turn promotion so that seniority lists of all ranks of Police Officers may be maintained in accordance with Law & Rules.

> Attential to be tome copy n

(IHSAN GHANI) Provincial Police Officer, Khyber Pakhtynkhwa, Peshawar.

Inspector legal