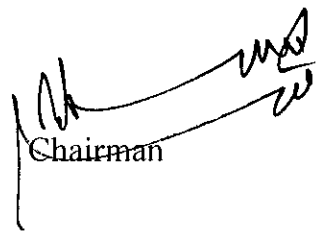


08.1.2018

None is present on behalf of the appellant. Addl. AG for the respondents present. Called several times but none appeared on behalf of the appellant. On previous date also none was present on behalf of the appellant.

In view of the above, the present appeal is dismissed for want of prosecution. File be consigned to the record room.

  
Member

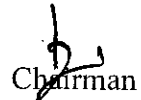
  
Chairman

ANNOUNCED

08.1.2018

06.04.2017

Counsel for the appellant and Mr. Adeel Butt, Addl: AG for the respondents present. Argument could not be heard due to incomplete bench. To come up for final hearing on 31.07.2017 before D.B.

  
Chairman

31.07.2017

Counsel for the appellant present. Mr. Fayaz, Head Constable alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 29.08.2017 before D.B.

  
(Ahmad Hassan)  
Member


  
(Muhammad Amin Khan Kundi)  
Member

p

29.08.2017

Counsel for the appellant and Mr. Ziaullah, DDA alongwith Fayaz, H.C for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 10.10.2017 before the D.B.

  
Member

  
Chairman

10.10.2017

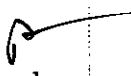
None is present on behalf of the appellant. Addl. AG alongwith Masood Jan, H.C for the respondents present. Last opportunity is granted. To come up for arguments on 08.01.2018 before the D.B.

  
Member

  
Chairman

08.04.2016

Ms. Uzma Syed, Advocate on behalf of counsel for the appellant and Mr. Wisal Khan, Inspector alongwith Addl: AG for respondents present. Counsel for the appellant is not available. Requested for adjournment. To come up for arguments on 01.08.2015.

  
Member

  
Member

01.08.2016

Counsel for the appellant and Mr. Fayaz, H.C alongwith Mr. Muhammad Jan, GP for respondents present. Learned counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on ~~6-12-16~~ before D.B.

  
MEMBER

  
MEMBER

06.12.2016

None present on behalf of the appellant despite repeated calls. Mr. Fayaz, H.C alongwith Mr. Muhammad Jan, GP for the respondents present. Notice be issued to appellant and his counsel for arguments for ~~6-4-17~~ before D.B.

  
(ASHFAQ TAJ)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER



u

15.12.2014

Clerk to counsel for the appellant, and Mr. Muhammad Adeel Butt, AAG with Wisal H.C for the respondents present. The Tribunal is incomplete. To come up for the same on 17.2.2015.

  
READER

17.2.2015

Counsel for the appellant and Mr. Muhammad Jan, GP with Iqbal Munir, H.C for the respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 01.6.2015.

  
MEMBER

  
MEMBER

01.06.2015

Clerk of counsel for the appellant and Mr. Fayaz, H.C alongwith Muhammad Jan, GP for the respondents present. Clerk of counsel for the appellant seeks adjournment. Adjourned to 07.12.2015 for arguments.

  
Member

  
Member

1.4.2014.

Counsel for the appellant and Mr. Muhammad Jan, GP with Hidayat Shah, Inspector (Legal) for the respondents present. Since connected appeal No. 40/12 has been adjourned, therefore, the instant appeal is also adjourned to 3.6.2014 for arguments.

MEMBER

MEMBER

03.6.2014

Counsel for the appellant and AAG with Bahroz Pirzada for the respondents present. Counsel for the appellant needs time. To come up for arguments on 24.7.2014.

MEMBER

MEMBER

24.07.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Wisal H.C for the respondents present. Due to retirement of learned executive Member, the Bench is incomplete. To come up for arguments on 29.10.2014.

MEMBER

29.10.2014

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP with Wisal H.C for the respondents present. Due to incomplete Bench, case is adjourned to 15.12.2014 for arguments.

MEMBER

20.11.2013

Counsel for the appellant and Mr. Muhammad Adeel Butt, AAG with Hidayat Shah, Inspector (Legal) for the respondents present. for the respondents apresent. Due to leave of Mr. Muhammad Aamir Nazir, learned Member, arguments could not be heard. To come up for arguments on 3.2.2014.

  
MEMBER

21.11.2013

Counsel for the appellant and Mr. Muhammad Adeel Butt, AAG present. Counsel for the appellant submitted an application for early hearing instead of 3.2.2014. Application is allowed and case to come up for arguments on 24.12.2013 instead of 3.2.2014.

  
MEMBER

  
MEMBER

24.12.2013.

Appellant with counsel and Mr. Muhammad Jan, GP with Hidayat Shah, Inspector (Legal) for the respondents present. Mr. Sultan Mahmood Khattak, learned Member is on leave, therefore, case is adjourned to 6.2:2014 for arguments

  
MEMBER

6.2.2014

Appellant with counsel, and Mr. Muhammad Jan, GP present. Notices be issued to the respondents present. To come up for arguments on 1.4.2014.

  
MEMBER

  
MEMBER

31.01.2013

Clerk of counsel for the appellant, and Hadayat Shah, Inspector( Legal) with AAG for the respondents present. Written reply received on behalf of the respondents, copy whereof is handed over to the clerk of counsel for the appellant. To come up for rejoinder on 27.03.2013.

Member

Member

27.03.2013

Appellant with counsel and Mr. Arshad Alam, GP for official respondents present. Rejoinder on behalf of the appellant has not been received, and request for further time made on behalf of the learned counsel for the appellant. To come up for arguments on 15.1.2013. Rejoinder, if any, in the meantime.

MEMBER

MEMBER

15.7.2013

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP with Muhammad Fayaz, H.C for the respondents present. Rejoinder received and placed on file. Copy handed over to the learned GP. To come up for arguments on 20.11.2013.

MEMBER

MEMBER

30.8.2012

Counsel for the appellant and Mr. Sherafgan Khattak, AAG also present. None is available as representative on behalf of the respondents, however, the learned AAG requested for time to contact them. He is directed to assure attendance and submission of the written reply of the respondents on 14.11.2012.

MEMBER

MEMBER

14.11.2012

Counsel for the appellant and Mr. Shakirullah, AGP with Hidayat Shah, Inspector for the respondents present. On previous date, the learned AGP was directed to ensure attendance and submission of written reply of the respondents. To-day Mr. Hidayat Shah, Inspector for the respondents present and requested for time to file written reply. To come up for written reply by way of last chance on 28.12.2012. In case the respondents failed to file written reply on the date fixed, no other chance will be given to them and they will be placed ex-parte.

MEMBER

MEMBER

28.12.2012

Clerk to counsel for the appellant and AAG with Ijaz Hussain, S.I (Legal) for the respondents present. Representative of the respondents stated that written reply will be submitted on the next date positively. To come up for written reply by way of last chance on 31.1.2013. In case the respondents failed to file written reply, they will be placed ex-parte and the case will be argued on the basis of available record.

MEMBER

MEMBER




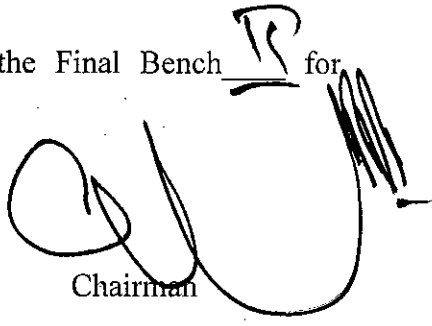
7. 30.5.2012

Counsel for the appellant and Mr. Hidayat Shah Inspector legal for the respondents present. Counsel for the appellant heard. Contends that the batch mates as well as junior to the appellant have been confirmed as ASIs and their names have been brought on list "E" vide the impugned order dated 27.9.2011 but the appellant has been ignored without any justification. The appellant is eligible and qualified as per promotion and confirmation criteria. The appellant preferred a departmental appeal but with no response. In support of his arguments regarding limitation the learned counsel for the appellant referred to 2005-PLC-CS-1475. Points raised 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 notice be issued to the respondents. Case adjourned to 30.8.2012 for submission of written reply.

  
Member

8. 30.5.2012

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

  
Chairman

Zaid Ali Qothbi

Counsel for the appellant present.

5. 21.3.2012.

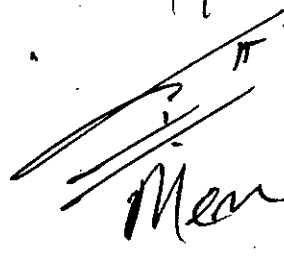
In order to ascertain true facts of the facts, including seniority of the appellant, pre-admission notice be given to the AAB/ Respondents. To come up for P.H. along with all relevant record on 24-4-2012.



Member.

6. 24-4-2012.

Counsel for the appellant present. Mr. Hidayatullah Inspector legal on behalf of respondents present and request for adjournment. To come up for written reply P.H. on 30-5-2012.



Member

Form- A  
FORM OF ORDER SHEET

Court of -----

Case No. 213/2012

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge or Magistrate   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1     | 16/02/2012                | <p>The appeal of Mr. Bahadar Sher submitted today by Mr. Ashraf Ali Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"><i>[Signature]</i><br/>REGISTRAR</p>  |
| 2     | 18-2-2012                 | <p>This case is entrusted to Primary Bench for Preliminary Hearing to be put up there on <u>7-3-2012</u></p> <p style="text-align: right;"><i>[Signature]</i><br/>CHAIRMAN</p> <p>7-3-2012. Appellant present. Request for adjournment. To come up for P.H. on 13-3-2012.</p> <p>13-3-2012. Clerk for Member present. Request for adjournment. To come up for P.H. on 21-3-2012.</p> <p style="text-align: right;"><i>[Signature]</i><br/>Member</p> |

The appeal of Mr. Bahadar Sher (118) Special Branch received to-day i.e. on 10/02/2012 is incomplete on the following scores which is returned to the counsel for the appellant for completion and re-submission within 15 days:-

- 1- Appeal may be got signed by the appellant.
- 2- Index of the appeal may be prepared according to Khyber pakhtunkhwa Service Tribunal Rules 1974.
- ③- Address of the appellant is incomplete which may be completed according to Service Tribunal rules 1974.
- ④- Sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect, shall also be shown as respondents.
- 5- Three copies/sets of the appeal alongwith annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 155 /S.T.

Dt. 11/02 /2012.

*[Signature]*  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

MR. ASHRAF ALI KHATTAK ADV.

*SIR, Re-submitted after completion.*

*[Signature]*

16/2/12

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 213 / 2012

*Bahador Sher* NSR  
Special branch, Nowshera.  
.....Appellant

Versus

The Provincial Police  
Officer and others.  
.....Respondents

**INDEX**

| S.No. | Description of Documents  | Date       | Annexure | Pages |
|-------|---|------------|----------|-------|
| 1.    | Memo of Service Appeal  |            |          | 1-6   |
| 2.    | Stay Application with Affidavit                                       |            |          | 7-8   |
| 3.    | Copy of order of Officiating Promotion to the rank of ASI             | 26-11-2009 | A        | 9-15  |
| 4.    | Copy of letter  | 23-07-2009 | B        | 16    |
| 5.    | Copy of Confirmation of Officiating ASI's belong to District Peshawar |            | C        | 17-22 |
| 6.    | Copy of minutes for proposed DPC meeting                              |            | D        | 23-26 |
| 7.    | Copy of departmental Appeal   |            | E        | 27-29 |
| 8.    | Wakalat Nama  |            |          | 30    |

Dated: \_\_\_\_\_ / 02/ 2012

Appellant  
Through

*Ashraf Ali Khattak*

Ashraf Ali Khattak  
Advocate, Peshawar  
16-B, Haroon Mension,  
Khyber Bazar, Peshawar.  
Cell:0333-9132497.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

SERVICE APPEAL. No. 213/2012

*Bahader Sheer (118)*, NSR Special Branch Nowshera  
.....(Appellant)

203  
10/02/12

Versus

1. The Provincial Police Officer, Khyber  
Pakhtunkhwa Peshawar.
2. The CCPO, Peshawar (D.I.G) Peshawar Region.
3. The District Police Officer,  
Nowshera.....(Respondents)

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SERVICE APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT,  
1974.

---

**PRAYER:**

*That on acceptance of this Service Appeal this  
Hon'ble Tribunal may graciously be please to set aside  
the impugned order bearing No. 15183.EC-I  
(Confirmation in the rank of ASIs and promotion to list  
'E') dated 27/09/2011 wherein batch mate as well as  
juniors to the appellant have not only been confirmed as  
regular ASIs but also their names have been brought on  
promotion list 'E', and against which appellant preferred  
department appeal which is still pending without  
disposal.*

Re-submitted to  
16/2/12

Re-submitted to  
and filed.

16/2/12

**Respectfully Sheweth:**

Facts giving rise to the present service appeal are as under:-

1. That appellant is the employee of police force and as on the straight of police force Nowshera. He is rendered valuable service for the Honour of police department and public at large. He was promoted to the rank of ASI on officiating basis vide order dated 26/11/2009 and his passed intermediate course in the year *2006*. (Annexure "A").
2. That it is pertinent to mention here that previously police department of District Nowshera was under the control and supervision of Regional Police Officer, Mardan but in the year 2009 Nowshera District Police have been annexed and attached with Peshawar region and is under the control and supervision of respondent No. 2.
3. That it is also pertinent of mention here that seniority list of ASIs has to be issued and maintained by the Regional Office i.e. respondent No. 2.
4. That by merging Nowshera District with Peshawar Region it was the duty of respondent No. 2 to issue and maintained seniority list of officiating ASIs belonging to the whole region including District Nowshera.

5. That in order to resolve the seniority position of the police officials belonging to District Nowshera with that of Police officials belonging to District Peshawar high level committee was constituted who considered and scrutinized the matter in there meeting held on 16/07/2009 and decided:- (Annexure "B").

"according to Police Rule 13.8 and 13.9 seniority list "C" and "D" are to be maintaining the districts where list "E" is maintain by the by the region, therefore the officer on the strength of Mardan Region who are willing for transfer to CCP Peshawar may up for their permanent transfer maintaining the districts Peshawar, Charsadda and Nowshera. There seniority in the district will be fixed in accordance with the merit list published by P.T:C in there respective rank with their colleagues in the district. Moreover in case of officiating SI their seniority will be fixed from the date of there confirmation as ASIs and admission to list "E" in the district opted".

6. That as per bonifide in knowledge of the appellant no such seniority list has been issued and maintained by the concerned office in respect of the officiating ASIs of the Nowshera District.
7. That as per rules the respondent No. 2 was under legal obligations to consider all the districts officiating ASIs for conformation purposes belonging to the whole regions under his control and supervision, but respondent No. 2 inspite of considering officiating ASIs of the whole region



considered only officiating ASIs belonging to Peshawar Districts only for conformation and promotion to list "E" which is sheer discrimination with appellant and others officiating ASIs belonging to Nowshera District. Moreover batch mate as well as junior to him have been confirmed as ASIs and their name has been brought on promotion list "E" vide impugned order dated 27/09/2011. (Annexure "C"). Incumbents at serial No. ~~180~~ to 190 of the impugned notification are the batch mate of the appellant while rest till serial No. 298 are junior to the appellant.

8. That it is also pertinent to bring in to the notice of this Hon'ble Tribunal that the respondents are going to promote the encampments of the impugned order to the next higher grade i.e. SI and for this purpose prescribed process of selection has been initiated annexure "D"
9. That being aggrieved from the impugned order dated 27/09/2011 appellant preferred departmental appeal annexure "E" before the competent authority but the same has not been disposed of till the date.
10. That appellant, being aggrieved of the acts and actions of Respondents and having no other adequate and efficacious remedy, files this service appeal inter-alia on the following grounds:-

Grounds:

- A. That Respondents have not treated petitioner in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973. Appellant has been promoted to the rank of officiating ASI in the year 2009 but has been deprived of his legitimate right of conformation and enlistment on the promotion list "E" whereas junior to him has not only been confirmed as Regular ASIs but have been brought on promotion list "E" which is not only discriminatory treatment but also illegal, unlawful, without lawful authority and against the principles of natural justice and fair play and equity, therefore, not maintainable in the eyes of law and liable to be set aside.
- B. That every civil servant has legitimate expectancy in rising up in government hierarchy by means of promotion. Appellant was illegible and qualified as per promotion and confirmation criteria laid down in statute and statutory rules and also as per their share in the region but have been deprived of the same without any reason whatsoever. Reliance's placed on PLD 2002 Supreme Court 728.
- C. That all public powers are in the nature of a trust and the government functionaries must act as repository of such trust. In the instant case the spirit of public trust and the legitimate right of not only of the appellant but of the whole ASIs

belonging to Nowshera District have been violated. On this core as well the impugned order is not maintainable in the eyes of law and therefore liable to be set aside.

- D. That appellant would like to seek the permission of this Hon'ble Tribunal to advance more grounds at the time of hearing and also would like to seek permission on this Hon'ble Tribunal to rebut any ground taken by the respondents at the time of hearing.

For the aforesaid reasons, it is therefore, humbly prayed that the instant appeal may graciously be accepted/ allowed as prayed for above.

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

*[Signature]*  
Appellant

Through

*[Signature]*

Ashraf Ali Khattak  
Advocate, Peshawar.

Dated: \_\_\_\_\_ / 02/ 2012

**AFFIDAVIT**

I, Bahadur Sher (118), NSR Special Branch Nowshera, do hereby solemnly affirm and declare on oath that the contents of this Service Appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.

ATTESTED  
HALID MAHMOOD ADVOCATE  
OATH COMMISSIONER  
PESHAWAR HIGH COURT

*[Signature]*  
16-2-12  
DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL No. \_\_\_\_\_ 2012

*Bahadur shor (118)*, NSR Special Branch Nowshera  
.....(Appellant)

Versus

The Provincial Police Officer; Khyber Pakhtunkhwa  
Peshawar and others.....(Respondents)

---

APPLICATION FOR RESTRAINING THE RESPONDENTS TO HOLD DPC MEETING FOR THE PURPOSE OF PROMOTION OF THE INCUMBENTS OF THE IMPUGNED ORDER DATED 27/09/2011 AND ALSO TO DIRECT THE RESPONDENTS NO. 2 REFRAIN FROM ISSUING NOTIFICATION IN RESPECT OF THE PROMOTION OF THE CITED INCUMBENTS IN CASE IF DPC HAS RECOMMENDED THEM FOR PROMOTION BEFORE THE FIXATION OF THE INSTANT APPLICATION.

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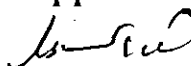
Respectfully Sheweth:

1. That the above titled service appeal is being filed today which is yet to be fixed for hearing.
2. That respondents are going to promote the incumbents of the impugned order to the next higher grade and in case they are recommended by the DPC and approved by the competent authority the appellant will suffer with irreparable

loss.

3. That the facts alleged and grounds taken in the body of main appeal may kindly be as an integral part of this application, which make out an excellent prima facie case in favour of the appellant.
4. That the balance of convenience also lies in favour of appellant and in case the impugned orders are not suspended the appellant will suffer irreparable loss.

It is, therefore, humbly prayed that on acceptance of this application, the operation of the impugned order dated 27/09/2011 may graciously be suspended till the final disposal of the appeal.

Applicant  
Through   
Ashraf Ali Khattak,  
Advocate, Peshawar.

Dated: 10 \_\_\_\_\_ / 02/ 2012

Affidavit

I, Bahadur Shere No. 118, NSR. Special Branch Nowshera, do hereby affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

ATTESTED  
SHALID MAHMOOD ADVOCATE  
OATH COMMISSIONER  
PESHAWAR HIGH COURT

16-2-12

  
DEPONENT

**FOR PUBLICATION IN THE NWFP POLICE GAZETTE PART-II  
ORDER BY THE CAPITAL CITY POLICE OFFICER, PESHAWAR.**

**NOTIFICATION.**

Dated Peshawar the 26 / 11 / 2009.

No. 16537 /EC-I. Promotion to the rank of Offg: ASIs:- In the light of recommendations submitted by Departmental Promotion Committee held on 21.11.2009, the following "D" list Head Constables of Capital City Police Peshawar are hereby promoted to the rank of Offg: ASI. Their promotion will take effect from the date they actually take over charge of their higher responsibility.

| S. NO | NAME & NO.  |   |     |
|-------|---|---|-----|
| 1.    | Imdad Ullah 2062/942 NSR<br>Special Branch        | ✓ | SB  |
| 2.    | Muhammad Nawaz 67 NSR<br>Nowshera                 | ✓ | SB  |
| 3.    | Ghulam Sarwar 172 NSR<br>Nowshera                 | ✓ | SB  |
| 4.    | Shad Muhammad 566 CHD<br>PS Batagram              |   |     |
| 5.    | Ishad Ali 3-106/153 NSR<br>Nowshera               | ✓ | SB  |
| 6.    | Sardar Ahmad 201 CHD<br>PS Tarnab                 |   |     |
| 7.    | Muhammad Kamran 515 NSR<br>Nowshera               | ✓ | KHC |
| 8.    | S. Muhammad Hanif 450 NSR<br>Nowshera             | ✓ | SB  |
| 9.    | Muhammad Ayaz 577 CHD<br>PS Mandani/Inv:          |   |     |
| 10.   | Muhammad Hayat 755/ 106 CHD:<br>Traffic Peshawar. |   |     |
| 11.   | Said Qamar 70 NSR<br>Nowshera                     | ✓ | SB  |
| 12.   | Muhammad Ismail 265 CHD)<br>Traffic/Peshawar.     |   |     |
| 13.   | Muhammad Naeem 57 NSR<br>Special Branch           | ✓ | SB  |
| 14.   | Bashir Ullah 322/ NSR<br>Nowshera                 |   |     |
| 15.   | Javad Khan 359 NSR<br>Nowshera                    | ✓ | SB  |
| 16.   | Muhammad Javed 282 CHD<br>Special Branch          |   |     |
| 17.   | Wilayat Shah 406 NSR<br>Nowshera                  | ✓ | SB  |
| 18.   | Gul Azam 290 CHD<br>PS Mandani                    |   |     |
| 19.   | Hasan Khan 824/CHD<br>I/C PP Utmanzai             |   |     |
| 20.   | Sajawal No. 670/NSR<br>Nowshera                   | ✓ | SB  |
| 21.   | Kareem Dad 692 NSR<br>Nowshera                    | ✓ | SB  |
| 22.   | Muhammad Tahir 663/NSR<br>Nowshera                | ✓ | SB  |
| 23.   | Zia Ullah 684/490/CHD:<br>PS Shabqadar/Inv:       |   |     |

**Attested**  
To be true copy  
Advocate

PPD/NSR  
21/12

|        |  |   |           |
|--------|--|---|-----------|
| 24     | Zardad Ali 525/NSR<br>Nowshera                   | ✓ | نوشہری    |
| 25     | Biladar 509/NSR<br>Nowshera                      | ✓ | کدر       |
| 26.    | Yahya Shah 572/CIID<br>I/C Regimental Store CIID |   |           |
| 27.    | Ali Jan 728/CHD<br>PS Sro Kali                   |   |           |
| 28.    | Jafar Shah 316 CIID<br>Police Line               |   |           |
| 29. 14 | Bahadar Sher 118 NSR<br>Nowshera                 | ✓ | نوشہری    |
| 30.    | Jamshid Khan 199 CHD<br>CRO/Inv:                 |   |           |
| 31. 15 | Safdar Ali 270 NSR<br>Nowshera                   | ✓ | کدر       |
| 32.    | Murad Ali 323 CIID<br>OHC Charsadda.             |   |           |
| 33.    | Janat Gul 283<br>(PS Shah Qabool)                |   | Peshawar  |
| 34.    | Umar Khan 540 NSR<br>Motor Way Police            | ✓ | M. Way    |
| 35.    | Itbar Shah 670 CIID<br>Traffic Peshawar.         |   |           |
| 36. 16 | Muhammad Ishaq 645 NSR<br>Nowshera               | ✓ | نوشہری    |
| 37.    | Hayat Ullah 683 CIID<br>PP Turlandai             |   |           |
| 38.    | Muhammad Riaz 13 CIID<br>PS Mandani              |   |           |
| 39. 17 | Ghulam Ali 578 NSR<br>Nowshera                   | ✓ | کدر       |
| 40.    | Liaqat Ali 607 CIID<br>PS Charsadda/Inv:         |   |           |
| 41.    | Gul Shed Ali 800 CIID<br>MHC PS Batagram         |   |           |
| 42.    | Fakhri Alam 650 CIID<br>PS Sro Kali              |   |           |
| 43.    | Rizwan Ullah 245 CIID<br>Prosecution/Charsadda.  |   |           |
| 44. 18 | Farmani Gul 91 NSR<br>Nowshera                   | ✓ | نوشہری    |
| 45. 19 | Muhammad Naz 968 NSR<br>Nowshera                 | ✓ | نوشہری    |
| 46.    | Hayat Muhammad 332 CIID<br>PS Mandani            |   |           |
| 47.    | Yousaf Ali 299 CHD<br>VRK DPO Office Charsadda.  |   |           |
| 48.    | Mujahid Shah 476 NSR<br>Motor Way Police         | ✓ | M. Way    |
| 49.    | Sangeen 349 NSR<br>Traffic Peshawar              | ✓ | Peshawar. |
| 50. 20 | Shakir Hussain 693 NSR<br>Nowshera               | ✓ | ایمانی    |
| 51.    | Muhammad Tayyeb No 529 NSR<br>ACE NWFP.          | ✓ | ACE       |
| 52. 21 | Jamshaid Khan 46 NSR<br>Nowshera                 | ✓ | نوشہری    |
| 53.    | Fazal Diyan 831/CHD<br>PS Sarki                  |   |           |
| 54.    | Shakir Ullah 856 CHD<br>Prosecution              |   |           |
| 55.    | Wilayat 600 CHD<br>On Leave                      |   |           |
| 56.    | Fazal Rokhan 843 CIID<br>On deputation to CID    |   |           |
| 57. 22 | Inayat ur Rehman 655 NSR<br>Nowshera             | ✓ | نوشہری    |
| 58.    | Mukarram Shah 910 CIID<br>I/C Casualty Tangi     |   |           |

70

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|     |   |   |                      |
|-----|---|---|----------------------|
|     | Muhammad Riaz 2427/1071 CHD<br>PS Tangi/Inv:      |   |                      |
| 60. | Tilawat Shah 904 CHD<br>MHC Tangi                 |   |                      |
| 61. | Akhtar Ali 518/NSR<br>Special Branch              | ✓ | SB                   |
| 62. | Munir Khan 390/CHD<br>MHIC PS Prang.              |   |                      |
| 63. | Sami Ullah 655/CHD<br>MHC PS Umarzai              |   |                      |
| 64. | Haji Muhammad 355/NSR<br>Nowshera                 | ✓ | ATC                  |
| 65. | Anjid Ali 339/CHD<br>PS Mandani                   |   |                      |
| 66. | Muhammad Ibrar 127/CHD<br>Police Line             |   |                      |
| 67. | Fazal Elahi 895/NSR<br>Special Branch             | ✓ | SB                   |
| 68. | Salceem Khan 743/888/NSR<br>Nowshera              | ✓ | الوزیرین             |
| 69. | Hasan Gul 587/CHD<br>Reader DSP/HQrs              |   |                      |
| 70. | Silver Khan 401/CHD<br>PS Shabqadar               |   |                      |
| 71. | Muhammad Alam 411/NSR<br>Nowshera                 | ✓ | الوزیرین             |
| 72. | Azghar Khan 751/CHD<br>Traffic Staff              |   |                      |
| 73. | Habib Ullah 140/CHD<br>On deputation to Motor Way |   |                      |
| 74. | Muhammad Tabrez 636/NSR<br>Nowshera               | ✓ | ایڈیٹر سپر ڈیوٹی ٹیم |
| 75. | Sujaat Khan 918/CHD<br>PS Sar Dheri               |   |                      |
| 76. | Sher Muhammad 477/NSR<br>Nowshera                 | ✓ | الوزیرین             |
| 77. | Ihsan Ullah 65/CHD<br>I/C Lower Court Charsadda.  |   |                      |
| 78. | Murad Ali 72/78/CHD<br>PS Umarzai/Inv:            |   |                      |
| 79. | Ghaffar Ali 862/CHD<br>PS Prang/Inv:              |   |                      |
| 80. | Wajid Ali No.304<br>(PS University Town Inv:)     |   | Peshawar             |
| 81. | Fayaz Muhammad 994/NSR<br>Nowshera                | ✓ | الوزیرین             |
| 82. | Nasar Ullah 924/CHD<br>Police Line Charsadda.     |   |                      |
| 83. | Masood Khan 755/CHD<br>MHIC PS Nisatta            |   |                      |
| 84. | Said Umar 919/CHD<br>MHC PS Tarnab                |   |                      |
| 85. | Fazal Badsha 305 CHD<br>PS Sar Dher/Inv:          |   |                      |
| 86. | Farid Shah 401/CHD<br>PS Umarzai.                 |   |                      |
| 87. | Iftikhar Hussain 579/NSR<br>Nowshera              | ✓ | ڈیپٹی ایڈیٹر         |
| 88. | Muhammad Ibraheem 540/NSR<br>Nowshera             | ✓ | ایڈیٹر 1392/میرپور   |
| 89. | Humayun 3/CHD<br>PS Umarzai/Inv:                  |   |                      |
| 90. | Maqbool Jehan<br>Inv: Wing Peshawar               |   |                      |
| 91. | Khizar Hayat<br>PS Pishtakhara                    |   | Peshawar             |
| 92. | Mumtaz Khan 1470<br>PS University Town            |   | Peshawar             |
| 93. | Anwar Jan No.90<br>(ATS Squad)                    |   | Peshawar             |

11

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|      |   |          |
|------|---|----------|
|      | Riaz Ali Shah 3976<br>On deputation to PTC Hangu.   |          |
|      | Hidayat Khan 3955<br>PS Badaber.                    | Peshawar |
| 96.  | Tehseen Ullah 458 CHD<br>PS Sardheri                |          |
| 97.  | Amir Muhammad 3915<br>Reader SSP/Coord: Peshawar    |          |
| 98.  | Jamhar ud Din 3535<br>PS Pishakhara                 | Peshawar |
| 99.  | Halqem Gul 3887<br>PS Pharipura                     | Peshawar |
| 100. | Fazal Ruban 2084<br>MHC PS Regi                     | Peshawar |
| 101. | Asad Khan 24<br>Traffic Peshawar                    |          |
| 102. | Jehanzaib 151/4021<br>Traffic Staff Peshawar        |          |
| 103. | Sabir Ullah 3911<br>PS Minchni Gate Inv:            | Peshawar |
| 104. | Muhammad Israr ud Din-727<br>Reader DSP Chamkani    | Peshawar |
| 105. | Ijaz Khan 890<br>PS Minchni Gate                    | Peshawar |
| 106. | Zahid Hussain 131<br>PS Pharipura Inv:              | Peshawar |
| 107. | Abdullah Jan 2512<br>PS E/Cantt:                    | Peshawar |
| 108. | Waqif Khan 4072<br>PS Pishakhara                    | Peshawar |
| 109. | Guldad Khan 37<br>On loan to PTC Hangu              |          |
| 110. | Zahid Ullah 473/ CHD<br>PS Charsadda                |          |
| 111. | Latif ur Rehman 496<br>Secretariat Peshawar         | Peshawar |
| 112. | Muhammad Iqbal 1972<br>OASI Branch                  | Peshawar |
| 113. | Muhammad Gul 342/276-1<br>Special Branch            |          |
| 114. | Sartaj 2669<br>On loan to Elite force               | Peshawar |
| 115. | Ghulam Hussain 331/3433<br>Special Branch           |          |
| 116. | Humayun Khan 549/372/1802<br>Traffic Staff Peshawar |          |
| 117. | Fida Muhammad 1097<br>PS Phandu                     | Peshawar |
| 118. | Subhan Ullah 3259/Chd;<br>(Traffic Police Peshawar) |          |
| 119. | Shaukat Kamal 3421<br>PS Pharipura                  | Peshawar |
| 120. | Khalid Khan 4078<br>PS Hashtnagri                   | Peshawar |
| 121. | Hamid 46<br>PS Urmar                                | Peshawar |
| 122. | Sartaj Khan 3633<br>PS Mathra                       | Peshawar |
| 123. | Wasif-ur-Rehman 3977<br>PS Hayat Abad               | Peshawar |
| 124. | Sardar Hussain 798<br>Police Line Nowshera.         |          |
| 125. | Farid Khan 3575<br>PS E/Cantt:                      | Peshawar |
| 126. | Tehseen Ullah 3733<br>PS Kotwali                    | Peshawar |
| 127. | Yasin Gul 1888<br>Motor Way Police                  |          |
| 128. | Atta Ullah 3348<br>Reader SSP/Operation             | Peshawar |

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|      |   |          |
|------|---|----------|
|      | Sajjad Ahmad 1519/44<br>PS Pharipura                        | Peshawar |
| 130. | Wajid Ali 2492<br>PS Chamkani                               | Peshawar |
| 131. | Khial Muhammad 51<br>PS Bhanamari                           | Peshawar |
| 132. | Rikhmeen-1935<br>Police Line                                | Peshawar |
| 133. | Jehan Zeb 3970<br>PS KRS                                    | Peshawar |
| 134. | Abdul Wali 4071<br>MHC PS B/Cantt:                          | Peshawar |
| 135. | Nowshervan 4091<br>Nakabandi PS Chamkani                    | Peshawar |
| 136. | Zahir Shah 3452<br>PS W/Cantt:                              | Peshawar |
| 137. | Fazal Rabi 4298/76/PTC<br>PTC Hangu                         |          |
| 138. | Momin Shah 1815/3219<br>Traffic Staff Peshawar              |          |
| 139. | Farid Gul-1381<br>MHC Subrub                                | Peshawar |
| 140. | Yahya Jan 446<br>Traffic Peshawar                           |          |
| 141. | Saif Ullah 3645<br>PS Hayat Abad                            | Peshawar |
| 142. | Ifikhar Ahmed 2684<br>MHC Pharipura                         | Peshawar |
| 143. | Ahmad Ali 4154<br>PS Phandu                                 | Peshawar |
| 144. | Noor Saeed 3606<br>PS Chamkani                              | Peshawar |
| 145. | Muhammad Riaz 3416<br>PS Khazana                            | Peshawar |
| 146. | Haji Rehman 100<br>PS Gulberg                               | Peshawar |
| 147. | Siraj 1714<br>Traffic Staff Peshawar                        |          |
| 148. | Nasim Akbar 107<br>ATS Line                                 | Peshawar |
| 149. | Qaim Khan 3886<br>PBI Hqrs Invt Peshawar                    |          |
| 150. | Bakht Munir 264<br>CPC                                      |          |
| 151. | Shamshad Ali 1326/440<br>PS W/Cantt:                        | Peshawar |
| 152. | Gul Muhammad 1025<br>On loan to PTC Hangu                   |          |
| 153. | Qayyum Dad 3679<br>MHC PS Tehkal                            | Peshawar |
| 154. | Khalid Khan 1963<br>MHC PS Phandu                           | Peshawar |
| 155. | Jahangir Khan 907<br>Special Branch                         |          |
| 156. | Sher Alam 1654/848/3583<br>Traffic Staff Peshawar           |          |
| 157. | Ihsan-ul-Haq 925/NSR.<br>On deputation to Traffic Peshawar. |          |
| 158. | Hashmat Khan 2707<br>PS Daudzai                             | Peshawar |
| 159. | Wajid Ali 473<br>Nowhsara District.                         | 32 ✓     |
| 160. | Nazif-ur-Rehman 689<br>Police Line                          | Peshawar |
| 161. | Misal Khan 1398<br>PS Faqir Abad                            | Peshawar |
| 162. | Tariq Niaz 3136<br>Secretariat                              | Peshawar |
| 163. | Aurang Zeb 2667<br>MHC W/Cantt:                             | Peshawar |

13

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Advocate

|      |  |           |
|------|--|-----------|
| 164. | Muhammad Aftab 889<br>Police Line          | Peshawar. |
| 165. | Gul Jalal 571<br>HMC Security              | Peshawar. |
| 166. | Sabz Ali 1993<br>Reader DSP/Cantt          | Peshawar. |
| 167. | Javid Akhtar 3455<br>PS Shahqabool         | Peshawar. |
| 168. | Tila Muhammad 457<br>PS Faqir Abad         | Peshawar. |
| 169. | Falak Taj 3304<br>Traffic Staff            | Peshawar. |
| 170. | Murad Ali 2770<br>PS Gulbahar              | Peshawar. |
| 171. | Sajjad Ali 2495<br>PS Hayatabad            | Peshawar. |
| 172. | Khan Muhammad 3591<br>PS Hayatabad         | Peshawar. |
| 173. | Bakhtiar Khan 758<br>Reader DSP/Rural Inv: | Peshawar. |
| 174. | Ilyas Khan 3703<br>PS Miachni Gate         | Peshawar. |
| 175. | Khaista Khan 1954<br>PS Khazana            | Peshawar. |
| 176. | Khalid Ahmed 797/108/2246<br>Traffic Staff | Peshawar. |
| 177. | Zakir Ullah 3113 (Rider to CM)<br>Traffic  | Peshawar. |
| 178. | Shahukat Khan 3888<br>Prosecution          | Peshawar. |
| 179. | Mukhtiar 2617<br>PS Khazana                | Peshawar. |
| 180. | Mushtaq 3618<br>(PS Regi)                  | Peshawar. |

"D" list HCs at S. No. 1,2,3,4,7,8,9,11,12,13, 14,15, 17,18, 20 to 27, 29 to 31, 33 to 40, 42 to 45, 48,50,52,54 to 58, 60 to 73, 76,80,81,87,88 and 90 to 93, are promoted conditionally subject to the clearance of incomplete ACRs. If their ACRs received adverse they will be reverted to their substantive rank.

The following "D" list HCs are deferred due to the reason mentioned against their name:-

|    |   |  |
|----|---|--|
| 1. | Bahar Ahmad 685/CHDMHC<br>PS Shabqadar.       | Deferred due to "C" adverse report contained in his ACR for the year 2008. |
| 2. | Ijaz Ullah 4024MHC Sarband<br>(under enquiry) | Deferred due to facing departmental enquiry.                               |
| 3. | Muslim Khan 1021<br>Lines (under enquiry)     | Deferred due to suspension /facing departmental enquiry.                   |

**CAPITAL CITY POLICE OFFICER,  
PESHAWAR.**

**Attested**  
To be true copy  
Advocate

No. 16538-57/EC-I,

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

1. The Provincial Police Officer, NWFP, Peshawar. He is requested to please issue repatriation order of the "D" list HC mentioned at S.No. 1,13,16,34,48,51,56,61,67,73,94,109,113,114,115,127,137,152 and 155 from various places/unit as noted their names to Capital City Police Peshawar.

- (15)
2. The Additional Inspector General of Police, Investigation, NWFP, Peshawar with two spare copies of the notification for publication in NWFP Police Gazette part-II.
  3. The Addl: Inspector General of Police Special Branch NWFP, Peshawar.
  4. The Inspector General of Police NH. & Motorway Police, Islamabad.
  5. The Deputy Inspector General of Police Mardan Region-I Mardan
  6. The Deputy Inspector General of Police, Traffic NWFP, Peshawar.
  7. The Commandant Elite Force NWFP Peshawar.
  8. The Commandant PTC Hangu.
  9. The Commandant Campus Peace Corps Peshawar.
  10. The Director Anti Corruption Establishment NWFP Peshawar.
  11. The Senior Superintended of Police Operation/Investigation/Traffic Peshawar.
  12. The District Police Officer Charsadda.
  13. The District Police Officer Nowshera.
  14. Pay Officer/EC-II/CC and FMC Branches CCP, Peshwar.
  15. Incharge Asstt: Secret with the direction to inform this office about the adverse ACRs of the conditionally promoted "D" list HCs so that they could be reverted to their substantive ranks.

*[Signature]*  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

**Attested**  
*[Signature]*  
To be true copy/  
Advocate

16  
v  
Avt B

From The Provincial Police Officer,  
NWFP, Peshawar.

To The Capital City Police Officer,  
Peshawar.

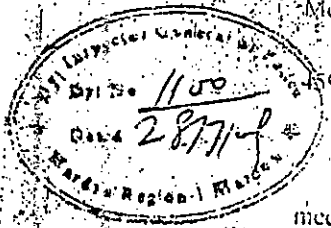
The Deputy Inspector General of Police,  
Mardan Region

No. 18564-65 /E-11 dated Peshawar the 23.7 /2009.

Subject: TRANSFER OF LIEN / FIXATION OF SENIORITY

Memo: Please refer to your Memo No. 922/E/S dated: 21.03.2009 and No. 594/E/C-1 dated: 01.04.2009 respectively.

EC  
For re-action's  
Report  
DPO/MSR  
30/7



The DPC thoroughly examined the case regarding transfer of lien in its meeting held on 16.07.2009 and decided that:

- 1) According to Police Rules 13 (8) and 13(9) seniority list C and D which are to be maintained by the respective districts, whereas list E is maintained by the region therefore, the officer on the strength of Mardan Region who are willing to transfer to CCP Peshawar may opt for their permanent transfer mentioning the district i.e. Peshawar, Charsadda and Nowshera. Their seniority in the district will be fixed in accordance with the merit list published by PTC in their respective rank with their colleagues in the district. Moreover in case of officiating SI their seniority will be fixed from the date of their confirmation as ASI and admission to list E in the District opted.
- 2) In order to facilitate the officials, two options for transfer to either districts would be required i.e. 1<sup>st</sup> and second option. If the vacancy is not available in the district opted for second option for other district will be considered for their transfer etc.
- 3) No lien shall be retained by the officials and transfer of the officials shall be on permanent basis.
- 4) The official from the parent district will be given preference for the transfer according to availability of seats.

Please obtain the requisite option from all concerned and submit to this office within ten days positively.

EC  
In-laden  
Mughe  
DPO/MSR

(MIAN KHURSHID ANWAR)  
AIG/Legal  
For Provincial Police Officer,  
NWFP, Peshawar.

Attested  
To be true copy  
Advocate

No. 22383P /E3 dated 29/7/2009  
copy to DPO Nowshera and  
Charsadda the requisite option may be  
submitted for the enclosed files for  
approval to the respective District Council  
under the limit of 75 days

5464  
31-7-09

6/7/09

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE  
PART-II ORDER BY THE CAPITAL CITY POLICE OFFICER PESHAWAR

## NOTIFICATION

No. 15183 EC-I, CONFIRMATION IN THE RANK OF ASIS AND PROMOTION TO LIST "E":- In the light of recommendations submitted by Departmental Promotion Committee held on 15<sup>th</sup>, 16<sup>th</sup> & 17<sup>th</sup> September, 2011 the following offg: ASIs/SIs on acting charge basis of Capital City Police Peshawar are hereby confirmed in their present rank and their names are also brought on promotion list "E" with immediate effect.

On confirmation they are allotted new C.C. P. Peshawar number as noted against their names.

| S.No. | Name number & Rank               | New CCP No. | Present Posting      |
|-------|----------------------------------|-------------|----------------------|
| 1     | Mukamil Shah 215 (SI ACB)        | 809/P       | CCP Peshawar         |
| 2     | Inzar Gul 54 (SI ACB)            | 810/P       | Charsadda            |
| 3     | Farhad Ali 655/CHD (SI ACB)      | 811/P       | Charsadda            |
| 4     | Shamshad 283 (SI ACB)            | 812/P       | Nowshera             |
| 5     | Hazrat Ali 103 ASI               | 813/P       | Motor Way            |
| 6     | Sanobar Shah 405 ASI             | 814/P       | Traffic              |
| 7     | Fateh Roze 881 (SI ACB)          | 815/P       | Traffic              |
| 8     | Liaqat Ali 2166 (SI ACB)         | 816/P       | Nowshera PRC (Hangu) |
| 9     | Qazi Aslam 502 (SI ACB)          | 817/P       | ACE Charsadda        |
| 10    | Siraj Rehman 2468 (SI ACB)       | 818/P       | CCP Peshawar         |
| 11    | Ilyas Khan 3090 (SI ACB)         | 819/P       | CCP Peshawar         |
| 12    | Inayat Ullah 1040 (SI ACB)       | 820/P       | Traffic              |
| 13    | Munir Khan 455 (SI ACB)          | 821/P       | CCP Peshawar         |
| 14    | M. Jamal 400/NSR (SI ACB)        | 822/P       | Nowshera             |
| 15    | Muhammad Tufail 371 (SI ACB)     | 823/P       | Traffic              |
| 16    | Khushdil Khan 2982 (SI ACB)      | 824/P       | CCP Peshawar         |
| 17    | Atlas Khan 3903 (SI ACB)         | 825/P       | Special Branch       |
| 18    | Zafar Ali 3708 (SI ACB)          | 826/P       | Traffic              |
| 19    | Nazeef ur Rehman 3068 (SI ACB)   | 827/P       | CCP Peshawar         |
| 20    | Muqarab Khan 3086 (SI ACB)       | 828/P       | CCP Peshawar         |
| 21    | Khalil ur Rehman 128 (SI ACB)    | 829/P       | Traffic              |
| 22    | Shafi Ullah 2955 (SI ACB)        | 830/P       | CCP Peshawar         |
| 23    | Wajid Ali 409 (SI ACB)           | 831/P       | Traffic KPK          |
| 24    | Mukhtiar Ahmed 356 (SI ACB)      | 832/P       | CCP Peshawar         |
| 25    | Khan Sahib 467 (SI ACB)          | 833/P       | CCP Peshawar         |
| 26    | Nadir Shah 1450 (SI ACB)         | 834/P       | Traffic              |
| 27    | Jehangir 3363 (SI ACB)           | 835/P       | CCP Peshawar         |
| 28    | Shahzada Khan 2365 (SI ACB)      | 836/P       | CCP Peshawar         |
| 29    | Noor Usman 2261 (SI ACB)         | 837/P       | Traffic              |
| 30    | Abur Rashid 2638 (SI ACB)        | 838/P       | Special Branch       |
| 31    | Ghaffar Ali 2513 (SI ACB)        | 839/P       | CCP Peshawar         |
| 32    | Pervoz Khan 2873 (SI ACB)        | 840/P       | CCP Peshawar         |
| 33    | Namdar Khan 269 (SI ACB)         | 841/P       | CCP Peshawar         |
| 34    | Mushtaq Ali 2815 (SI ACB)        | 842/P       | CCP Peshawar         |
| 35    | Shah ehan 256 (SI ACB)           | 843/P       | CCP Peshawar         |
| 36    | Israr Muhammad No. 1471 (SI ACB) | 844/P       | CCP Peshawar         |
| 37    | Zawar Shah 2516 (SI ACB)         | 845/P       | Traffic              |
| 38    | Khan Ghalib 2544 (SI ACB)        | 846/P       | CCP Peshawar         |
| 39    | Azeem Khan 3000/1174 (SI ACB)    | 847/P       | Traffic              |
| 40    | Sazwali 1122 (SI ACB)            | 848/P       | Traffic              |
| 41    | S. Farid Shah 1500 (SI ACB)      | 849/P       | CCP Peshawar         |
| 42    | Hanif Ullah 1400 (SI ACB)        | 850/P       | Campus               |
| 43    | Sher Malik 1795 (SI ACB)         | 851/P       | CCP Peshawar         |
| 44    | Naseem Khan 132 (SI ACB)         | 852/P       | Traffic              |

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|     |                           |          |       |                |
|-----|---------------------------|----------|-------|----------------|
| 45  | Jan Alam 69               | (SI ACB) | 853/P |                |
| 46  | Shams ul Hadi 2736        | (SI ACB) | 854/P | CCP Peshawar   |
| 47  | Waris Khan 2869           | (SI ACB) | 855/P | Traffic        |
| 48  | Imdad Ullah 134           | (SI ACB) | 856/P | CCP Peshawar   |
| 49  | Jehanzeb 793              | (SI ACB) | 857/P | CCP Peshawar   |
| 50  | Muhammad Shahid 2062      | (SI ACB) | 858/P | PS Traffic     |
| 51  | Sardar Ali 836            | (SI ACB) | 859/P | Traffic        |
| 52  | Muhammad Arif 93          | (SI ACB) | 860/P | RTC Attock     |
| 53  | Abdul Qayyum 17           | (SI ACB) | 861/P | CCP Peshawar   |
| 54  | Misbah ud Din 676         | (SI ACB) | 862/P | CCP Peshawar   |
| 55  | Inayat Ur Rehman 2502     | (SI ACB) | 863/P | Traffic        |
| 56  | Tajbar Khan 2890          | (SI ACB) | 864/P | Governor House |
| 57  | Ashfaq Alam 167           | (SI ACB) | 865/P | CCP Peshawar   |
| 58  | Aziz ullah 2757           | (SI ACB) | 866/P | Traffic        |
| 59  | Muhammad Naseem 404/NSR   | (SI ACB) | 867/P | Traffic        |
| 60  | Fazal Dad 943/NSR         | (SI ACB) | 868/P | Nowshera       |
| 61  | Nasrat Ali 2153           | (SI ACB) | 869/P | Traffic        |
| 62  | Gul Rehman 413/NSR        | (SI ACB) | 870/P | CCP Peshawar   |
| 63  | Muhammad Azeem 2290       | (SI ACB) | 871/P | Traffic        |
| 64  | Ihsan ur Rehman 60/NSR    | (SI ACB) | 872/P | Traffic        |
| 65  | Shamroz Khan 303          | (SI ACB) | 873/P | Nowshera       |
| 66  | Aziz ur Rehman 2061       | (SI ACB) | 874/P | Traffic        |
| 67  | Madad Khan 910/NSR        | (SI ACB) | 875/P | Traffic        |
| 68  | Abdul Ghafoor 265/171/NSR | (SI ACB) | 876/P | Nowshera       |
| 69  | Fazal Subhan 265/CHD      | (SI ACB) | 877/P | Nowshera       |
| 70  | Bakht Zali 199/NSR        | (SI ACB) | 878/P | Traffic        |
| 71  | Musa Khan 115             | (SI ACB) | 879/P | Traffic        |
| 72  | Zakir Ullah 3077          | (SI ACB) | 880/P | Traffic        |
| 73  | Islah ud Din 1636         | (SI ACB) | 881/P | Traffic        |
| 74  | Muhammad Shaheen Shah/FRP | (SI ACB) | 882/P | Traffic        |
| 75  | Mudassir Shah 2409        | (SI ACB) | 4/P   | Special Branch |
| 76  | Amir Sial 1847            | (SI ACB) | 883/P | CCP Peshawar   |
| 77  | Aman Ullah 385            | (SI ACB) | 884/P | CCP Peshawar   |
| 78  | Lal Zada 480              | (SI ACB) | 885/P | Traffic        |
| 79  | Muhammad Fazil 146/CHD    | (SI ACB) | 886/P | Traffic        |
| 80  | Fazal Rehman 3394         | (SI ACB) | 887/P | Charsadda      |
| 81  | Behroz Khan 936/NSR       | (SI ACB) | 888/P | CCP Peshawar   |
| 82  | Zafar Ali 513/CHD         | (SI ACB) | 889/P | Nowshera       |
| 83  | Tajuddin 997              | (SI ACB) | 890/P | Traffic        |
| 84  | Khial Wali 3987           | (SI ACB) | 891/P | CPO            |
| 85  | Bashir Gul 625/CHD        | (SI ACB) | 892/P | Traffic        |
| 86  | Muhammad Younas 680/CHD   | (SI ACB) | 893/P | Traffic        |
| 87  | Jehangi Khan 1263         | (SI ACB) | 894/P | Charsadda      |
| 88  | Qaimat Bali 203/NSR       | (SI ACB) | 895/P | CCP Peshawar   |
| 89  | Gul Nawaz 214             | (SI ACB) | 896/P | Nowshera       |
| 90  | Aman ullah 1022           | (SI ACB) | 897/P | Traffic        |
| 91  | Tilawat Shah 229          | (SI ACB) | 898/P | Traffic        |
| 92  | Muhammad Azam 1236        | (SI ACB) | 899/P | Traffic        |
| 93  | Noor Ullah Jan 211        | (SI ACB) | 900/P | CCP Peshawar   |
| 94  | Khial Nawaz 1022/NSR      | (SI ACB) | 901/P | CID            |
| 95  | Mushtaq Ali 717/CHD       | ASI      | 902/P | Nowshera       |
| 96  | Anwar Khan 694/CHD        | (SI ACB) | 903/P | Charsadda      |
| 97  | Sher Alam 200             | (SI ACB) | 904/P | Charsadda      |
| 98  | Muhammad Qayyum 265/NSR   | ASI      | 905/P | Special Branch |
| 99  | Malang Jan 2401           | (SI ACB) | 906/P | Nowshera       |
| 100 | Alam Sher 3091            | (SI ACB) | 907/P | CCP Peshawar   |
| 101 | Masal Khan 2566/39        | (SI ACB) | 908/P | Traffic        |
| 102 | Amir Muhammad 569/CHD     | (SI ACB) | 909/P | Traffic        |
| 103 | Farman Ullah 1227         | (SI ACB) | 910/P | Traffic        |
| 104 | Hamid Ali 1475            | (SI ACB) | 911/P | CCP Peshawar   |
| 105 | Mir Hassan 661/NSR        | (SI ACB) | 912/P | Traffic        |
| 106 | Jamshed Khan 262/NSR      | (SI ACB) | 913/P | Nowshera       |

18

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*[Signature]*  
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|     |                        |          |       |                      |
|-----|------------------------|----------|-------|----------------------|
| 107 | Hazrat Ali 783/NSR     | (SI ACB) | 914/P | Nowshera             |
| 108 | Ghaffar Ali No.277     | (SI ACB) | 915/P | CCP Peshawar         |
| 109 | Arshullah 421          | (SI ACB) | 916/P | Traffic              |
| 110 | Abdur Rauf 676/NSR     | (SI ACB) | 917/P | ATS/Traffic          |
| 111 | Sardar Hussain 721/CHD | (SI ACB) | 918/P | Charsadda            |
| 112 | Kiramal Shah 618/CHD   | (SI ACB) | 919/P | Charsadda            |
| 113 | Qaiser Khan 669/CHD    | (SI ACB) | 920/P | Charsadda            |
| 114 | Dad Muhammad 1046      | (SI ACB) | 921/P | CCP Peshawar         |
| 115 | Muhammad Diyar 110     | (SI ACB) | 922/P | CCP Peshawar         |
| 116 | Inayat ur Rehman 743   | (SI ACB) | 923/P | CCP Peshawar         |
| 117 | Muhammad Iqbal 967     | (SI ACB) | 924/P | CCP Peshawar         |
| 118 | Umer Sher 13           | (SI ACB) | 925/P | CCP Peshawar         |
| 119 | Ghani ur Rehman 3951   | (SI ACB) | 927/P | CCP Peshawar         |
| 120 | Bakht Munir 3195       | (SI ACB) | 928/P | CCP Peshawar         |
| 121 | Abid Saeed 3461        | (SI ACB) | 929/P | CCP Peshawar         |
| 122 | Sher Muhammad 3869     | (SI ACB) | 930/P | Special Branch       |
| 123 | Akhtar Gul 2552        | (SI ACB) | 931/P | CCP Peshawar         |
| 124 | Fazal Karim 1941       | (SI ACB) | 932/P | CCP Peshawar         |
| 125 | Khial Badshah 2638     | (SI ACB) | 933/P | Traffic              |
| 126 | Hassan ul Wahab 708    | (SI ACB) | 934/P | Inv: CPO             |
| 127 | Ibrahim Khan 1928      | (SI ACB) | 935/P | CCP Peshawar         |
| 128 | Waheed Shah 46         | (SI ACB) | 936/P | CCP Peshawar         |
| 129 | Niamat Gul 56          | ASI      | 937/P | Motor Way Police     |
| 130 | Noor Gul 2465          | (SI ACB) | 938/P | Traffic              |
| 131 | Sher Azam 462          | ASI      | 939/P | Traffic              |
| 132 | Muhammad Ghani 3942    | (SI ACB) | 940/P | CCP Peshawar         |
| 133 | Zakir Ullah 2768       | (SI ACB) | 941/P | Traffic              |
| 134 | Muhammad Tahir 1572    | (SI ACB) | 942/P | CCP Peshawar         |
| 135 | Sardar Ali 3941        | (SI ACB) | 943/P | Traffic              |
| 136 | Imtiaz Ahmed 795       | (SI ACB) | 944/P | CCP Peshawar         |
| 137 | Istidar Khan 314       | (SI ACB) | 945/P | CCP Peshawar         |
| 138 | Anwar Snah 2626        | ASI      | 946/P | CCP Peshawar         |
| 139 | Safdar Khan 247        | ASI      | 947/P | CCP Peshawar         |
| 140 | Inam ullah 2391/ 1391  | ASI      | 948/P | CCP Peshawar         |
| 141 | Dost Muhammad 266      | (SI ACB) | 949/P | CCP Peshawar         |
| 142 | Niaz Munammad 293/CPC  | ASI      | 950/P | CPC                  |
| 143 | Roman Shah 471         | ASI      | 951/P | Traffic              |
| 144 | Khan Gul 1592          | ASI      | 952/P | Governor House       |
| 145 | Bahadar Snah 230/CPC   | ASI      | 953/P | Traffic              |
| 146 | Umer Zamin 1051        | ASI      | 954/P | CCP Peshawar         |
| 147 | Muhammad Ayub 3541     | ASI      | 955/P | Special Branch       |
| 148 | Javaid Iqbal No. 2938  | ASI      | 956/P | CCP Peshawar         |
| 149 | Gul Wali 3206          | ASI      | 957/P | CCP Peshawar         |
| 150 | Doran Shah 3431        | ASI      | 958/P | CCP Peshawar         |
| 151 | Abdul-Rashid 3155      | ASI      | 959/P | CCP Peshawar         |
| 152 | Zubair Khan No. 3822   | ASI      | 960/P | CCP Peshawar         |
| 153 | Javiad Akhtar 39/CPC   | ASI      | 961/P | CCP Peshawar         |
| 154 | Fida Muhammad 156/CPC  | ASI      | 962/P | Special Branch       |
| 155 | Muhammad Ikram 12/CPC  | ASI      | 963/P | Operation Room CPO   |
| 156 | Israr Muhamamd 3883    | ASI      | 964/P | CCP Peshawar         |
| 157 | Naik Zaman 2567        | ASI      | 965/P | Traffic              |
| 158 | Khial Roz 3761         | ASI      | 966/P | CCP Peshawar         |
| 159 | Raza Badshah 3640      | ASI      | 967/P | Traffic              |
| 160 | Muhammad Raghilb 1557  | ASI      | 968/P | CCP Peshawar         |
| 161 | Malik Anmed 2767       | ASI      | 969/P | CCP Peshawar         |
| 162 | Wazir Muhammad 159/CPC | ASI      | 970/P | Motor Way            |
| 163 | Gul Sher 390           | ASI      | 971/P | CCP Peshawar         |
| 164 | Noor Rehman 781        | ASI      | 972/P | CCP Peshawar         |
| 165 | Zafar Khan 2323        | ASI      | 973/P | CCP Peshawar         |
| 166 | Zia Ullah 2532/FRP     | ASI      | 974/P | CCP Peshawar/Traffic |
| 167 | Raza Muhammad 85       | ASI      | 975/P | Traffic kPK          |
| 168 | Yousaf Jan 316/CPC     | ASI      | 976/P | CPC                  |
| 169 | Sikandar Shah 759      | (SI ACB) | 977/P | CCP Peshawar         |

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*[Signature]*  
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 Advocate



|     |                         |          |        |                |
|-----|-------------------------|----------|--------|----------------|
| 170 | Muhammad Anwar 3152     | ASI      | 978/P  | CCP Peshawar   |
| 171 | Jan Muhamamd 2917       | ASI      | 979/P  | Traffic KPK    |
| 172 | Inayat Ullah 129        | ASI      | 980/P  | CCP Peshawar   |
| 173 | Abdul Rauf 3112/FRP     | ASI      | 981/P  | Traffic        |
| 174 | Mohib Gul 3116          | ASI      | 982/P  | CCP Peshawar   |
| 175 | Khursid 191/CHD         | ASI      | 983/P  | Charsadda      |
| 176 | Razi Khan 3828          | ASI      | 984/P  | CCP Peshawar   |
| 177 | Muhammad Akram 234      | ASI      | 985/P  | CCP Peshawar   |
| 178 | Muhammad Riaz 107/CPC   | ASI      | 986/P  | Traffic        |
| 179 | Farhad Hussain 3419     | ASI      | 987/P  | Traffic        |
| 180 | Sawal Faqir 929         | ASI      | 988/P  | Traffic        |
| 181 | Sana Ullah 27           | ASI      | 1/P    | CCP Peshawar   |
| 182 | Yousaf Khan No. 64      | ASI      | 989/P  | CCP Peshawar   |
| 183 | Riaz Ahmed 2354         | ASI      | 990/P  | CCP Peshawar   |
| 184 | Haider Raza 315/CPC     | ASI      | 991/P  | CCP Peshawar   |
| 185 | Zahoor Rehman 3137      | (S: ACB) | 992/P  | CCP Peshawar   |
| 186 | Roze Amin 4476          | ASI      | 993/P  | CCP Peshawar   |
| 187 | Noor ul Hadi 2688       | ASI      | 994/P  | Traffic        |
| 188 | Faqir Hussain 2879      | ASI      | 995/P  | Traffic        |
| 189 | Dil Faraz 4477          | ASI      | 996/P  | CCP Peshawar   |
| 190 | Zafar Ali 1391          | ASI      | 997/P  | CCP Peshawar   |
| 191 | Muhammad Ibrahim 2115   | ASI      | 998/P  | CCP Peshawar   |
| 192 | Tilawat Khan 2844       | ASI      | 999/P  | CCP Peshawar   |
| 193 | Fahim Ullah 179         | ASI      | 1000/P | Traffic        |
| 194 | Zahir Shah 1171         | ASI      | 1001/P | CCP Peshawar   |
| 195 | Khalil ur Rehman 1693   | ASI      | 1002/P | CCP Peshawar   |
| 196 | Sardar Hussain 109      | ASI      | 1003/P | CCP Peshawar   |
| 197 | Sher Rehman 1011        | ASI      | 1004/P | CCP Peshawar   |
| 198 | Ali Bahadar 4443        | ASI      | 1005/P | CCP Peshawar   |
| 199 | Qaimat Gul 1264         | ASI      | 1006/P | CCP Peshawar   |
| 200 | Fazle Khaliq 2560       | ASI      | 1007/P | CCP Peshawar   |
| 201 | Wali Zada 2755          | ASI      | 1008/P | Traffic        |
| 202 | S.Rokhan Shah 9/CPC     | ASI      | 1009/P | Traffic        |
| 203 | Shamsher Ali 3595       | ASI      | 1010/P | Traffic        |
| 204 | Muhamamd Israr No. 3583 | ASI      | 1011/P | CCP Peshawar   |
| 205 | S. Kamal Shah 384       | ASI      | 1012/P | CCP Peshawar   |
| 206 | Ali Hussain 211/CPC     | ASI      | 1013/P | Elite Force    |
| 207 | Behram Gul 2016         | ASI      | 1014/P | CCP Peshawar   |
| 208 | Sufaid Gul 471          | ASI      | 1015/P | Traffic        |
| 209 | Ghulam Ali 3715/1969    | ASI      | 1016/P | Special Branch |
| 210 | Diyar Khan 3465         | ASI      | 1017/P | Traffic        |
| 211 | Said Malik 29/CPC       | ASI      | 1018/P | CCP Peshawar   |
| 212 | Ahmad Jamal 124         | ASI      | 1019/P | Traffic        |
| 213 | Muhammad Tahir 3700     | ASI      | 1020/P | Traffic        |
| 214 | Khushal Khan 52         | ASI      | 06/P   | CCP Peshawar   |
| 215 | Masal Khan 789          | ASI      | 1021/P | CCP Peshawar   |
| 216 | Misri Gul 99            | ASI      | 1022/P | Traffic        |
| 217 | Fazal Rahim 896         | ASI      | 1023/P | CCP Peshawar   |
| 218 | Shah Rasool 4142        | ASI      | 1024/P | CCP Peshawar   |
| 219 | Himayat Ullah 2762      | ASI      | 1025/P | Traffic KPK    |
| 220 | Abdul Hamid 2288        | ASI      | 1026/P | Traffic        |
| 221 | Muhammad Bashir 3284    | ASI      | 1027/P | Traffic        |
| 222 | Hassan Khan 3327        | ASI      | 1028/P | CCP Peshawar   |
| 223 | Fazal Mabood 2659       | ASI      | 1029/P | Traffic        |
| 224 | Nisar Ahmed 123/CPC     | ASI      | 1030/P | Traffic        |
| 225 | Abid Rasheed No. 279    | ASI      | 1031/P | Spl Branch     |
| 226 | Bakht Diyan 998         | ASI      | 1032/P | CCP Peshawar   |
| 227 | Burhan ud Din 1358      | ASI      | 1033/P | CCP Peshawar   |
| 228 | Muhammad Sabir 178      | ASI      | 1034/P | CCP Peshawar   |
| 229 | Inam Ullah 725          | ASI      | 1035/P | Traffic        |
| 230 | Hassan Gul 3404         | ASI      | 1036/P | CCP Peshawar   |
| 231 | Khalid ur Rehman 4096   | ASI      | 1037/P | CCP Peshawar   |
| 232 | Ghulam Haider 2715      | ASI      | 1038/P | Traffic        |
| 233 | Waqar Haider 3106       | ASI      | 1039/P | Special Branch |
| 234 | Hassan Zamir 2196       | ASI      | 1040/P | CCP Peshawar   |
| 235 | Rooh ul Amin 3692       | ASI      | 1041/P | Traffic        |
| 236 | Murad Ali 2973          | ASI      | 1042/P | Traffic        |
| 237 | Ikram Ullah 2485        | ASI      | 1043/P | CCP Peshawar   |
| 238 | Akbar Khan 1919         | ASI      | 1044/P | Special Branch |
| 239 | Sabir Ali 1144          | ASI      | 1045/P | Traffic        |

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*[Signature]*  
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21

|     | (SI ACB)                 | 6/P | Charsadda District |
|-----|--------------------------|-----|--------------------|
| 240 | Ihsan Shah 88/CPC        | ASI | CCP Peshawar       |
| 241 | Muhammad Ibrahim 1135    | ASI | CCP Peshawar       |
| 242 | Islam Shah 2812          | ASI | CCP Peshawar       |
| 243 | Fazal Rabbi 4464         | ASI | CCP Peshawar       |
| 244 | Faizullah 3875           | ASI | CCP Peshawar       |
| 245 | Ikhtiar Ali 24           | ASI | Inv: KPK           |
| 246 | Alam Zeb 660/CPC         | ASI | CPC                |
| 247 | Muhammad Ayaz 2573       | ASI | Traffic            |
| 248 | Gulnawaz Khan 32         | ASI | DSP/Legal Branch   |
| 249 | Nasrullah 1216           | ASI | CCP Peshawar       |
| 250 | Mian Mohib Jan 539       | ASI | CCP Peshawar       |
| 251 | Ifkhar 3169              | ASI | CCP Peshawar       |
| 252 | Nasrullah 307/CPC        | ASI | Traffic            |
| 253 | Jehanzeb 541             | ASI | CCP Peshawar       |
| 254 | Shad Muhammad 581        | ASI | CCP Peshawar       |
| 255 | Khushal Khan 3513        | ASI | CCP Peshawar       |
| 256 | Noor Haider 1163         | ASI | CCP Peshawar       |
| 257 | Muhammad Zeb 636/336     | ASI | CCP Peshawar       |
| 258 | Hidayat Ullah 1806       | ASI | CCP Peshawar       |
| 259 | Hafeez ur Rehman 177/CPC | ASI | Traffic            |
| 260 | Niaz Ullah 3366          | ASI | Traffic            |
| 261 | Muhammad Ishrat Yar 2334 | ASI | CCP Peshawar       |
| 262 | Syed Zaman 42            | ASI | Traffic            |
| 263 | Abdul-Wali 6/CPC         | ASI | Traffic            |
| 264 | Muhammad Nawaz 2151      | ASI | Traffic            |
| 265 | Hidayat Ullah 2137       | ASI | CCP Peshawar       |
| 266 | Amir Nawab 242/CPC       | ASI | Traffic            |
| 267 | Muhammad Riaz 809        | ASI | Traffic            |
| 268 | Ghafir Ullah 691/CHD     | ASI | Traffic            |
| 269 | Farrukh Zada 1225        | ASI | CCP Peshawar       |
| 270 | Sabz Ali 886             | ASI | CCP Peshawar       |
| 271 | Syed Abid Shah 2333      | ASI | Traffic            |
| 272 | Asmat Ullah 1034         | ASI | CCP Peshawar       |
| 273 | Saeed Ullah 471/3555     | ASI | Traffic            |
| 274 | Muhammad Ali 1029        | ASI | Traffic            |
| 275 | Shahjee Hussain 896      | ASI | Sp:Branch          |
| 276 | Sabir Shah 1606/707      | ASI | Traffic            |
| 277 | Fida Muhammad 1104       | ASI | CCP Peshawar       |
| 278 | Ahmed Gul 3417           | ASI | CCP Peshawar       |
| 279 | Umer Shah 1619           | ASI | CCP Peshawar       |
| 280 | S. Sardar Ali Shah 3109  | ASI | CCP Peshawar       |
| 281 | Akhtar Hussain 3745      | ASI | CCP Peshawar       |
| 282 | Dawood Jan 842           | ASI | CCP Peshawar       |
| 283 | Qayyum Khan 65/CPC       | ASI | CCP Peshawar       |
| 284 | Waris Khan 1037          | ASI | CCP Peshawar       |
| 285 | Sehat Ali 1602           | ASI | Traffic            |
| 286 | Muhammad Rehan 1943      | ASI | Special Branch     |
| 287 | Muzamil Khan No. 1015    | ASI | CCP Peshawar       |
| 288 | M. Arif 3543             | ASI | CCP Peshawar       |
| 289 | Sahib Gul 161/CPC        | ASI | Traffic            |
| 290 | Muhammad Jan 1049        | ASI | CCP Peshawar       |
| 291 | Atta-ur-Rehman 2366      | ASI | CCP Peshawar       |
| 292 | Feroze Shan 2174         | ASI | CCP Peshawar       |
| 293 | Zain Ullah 3396          | ASI | CCP Peshawar       |
| 294 | Nasrullah 1126           | ASI | INV KPK NAB.       |
| 295 | Inayat ur Rehman 141/CPC | ASI | CPC                |
| 296 | Waris Khan 314           | ASI | CCP Peshawar       |
| 297 | Abdur Rehman 132/CPC     | ASI | CPC                |
| 298 | Asinat Ullah No.120/PTC  | ASI | CCP Peshawar       |

Officiating ASIs/Sis on acting charge basis at serial No.4,7,8,9,10,15,20,21,27,29,31,32,33,35,43,47,48,53,54,56,58,59,60,64,67,68,73,76, 84,87, 91,92,100,101,104,107,120,138,146,152,173,179,186,197,198,199,201,204,207, 214,221,224, 228,231,234,236,237,239,244,250,252,257,262,265,276,278,288,290,295,296 and 298 are confirmed and their names brought on promotion list "E" conditionally subject to the completion of their ACRs within 30-days otherwise they will be reverted to their substantive rank.

Attested  
*[Signature]*  
 To be true copy  
 Advocate

22

The following officiating ASIs are deferred due to the reason mentioned against their names.

|    |                              |              |   |
|----|------------------------------|--------------|---|
| 1  | Anwar Ali No. 950/NSR SI ACB | Nowshera     | Deferred from confirmation in the rank of ASI, and promotion to List "E" due to "C" report for the year 2010.   |
| 2  | ASI Karam Elahi No. 9248/FRP | CCP Peshawar | Deferred from confirmation in the rank of ASI and promotion to List "E" due to promotion with held for three years by PPO KPK No. 11839/E-II, dated: 04.05.2010 and also under enquiry. |
| 3  | Abbas Ali 1642 SI ACB        | CCP Peshawar | Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence and incomplete ACR - 2010.   |
| 4  | Munawar Khan 3043 SIA ACB    | Traffic      | Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence / incomplete ACRs - 2008, 2009 and 2010.   |
| 5  | Ejaz Ahmed SI ACB            | Traffic      | Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence/incomplete ACRs - 2006, 2008, 2009 & 2010.   |
| 6  | Maqsood Ahmed 1946 SI ACB    | CCP Peshawar | Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence incomplete ACR-2010.   |
| 7  | Dawa Noor No. 1554 SI ACB    | Traffic      | Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence/incomplete ACRs-2008 & 2009.   |
| 8  | Khalid Khan No. 2381 SI ACB  | Traffic      | Deferred from confirmation in the rank of ASI and due to absence/incomplete ACR-2009 & 2010.  |
| 9  | Muhamamd Sher 1561           | CCP Peshawar | Deferred from confirmation in the rank of ASI, promotion to List "E" due to time scale for 03-years by SSP/Operations Peshawar vide O.B.No. 710, dated 24.02.2011.                      |
| 10 | Qasro Khan No. 1382          | CCP Peshawar | Deferred from confirmation in the rank of ASI, promotion to List "E" due to facing departmental enquiry and also absence from DPC/missing ACR-2006.                                     |
| 11 | Mukamil Shah No. 3085        | CCP Peshawar | Deferred from confirmation in the rank of ASI, promotion to List "E" due to incomplete ACRs for the 2008, 2009 & 2010 and absence from DPC.   |

*[Signature]*  
 CAPITAL CITY POLICE OFFICER  
 PESHAWAR  
 27/09/2011

- No. 15184-203 /EC-I, dated Peshawar the 27/09/2011.
- Copy of above is forwarded for information and necessary action to:-
1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
  2. The Inspector General of Police, NH & Motor Way Police, Islamabad.
  3. The Additional Inspector General of Police, Investigation, KPK Peshawar with 02-spares copies of the Notification for publication in KPK Police Gazette Part-II.
  4. The Additional Inspector General of Police, Special Branch KPK Peshawar.
  5. The Additional Inspector General of Police/Commandant PTC Hangu.
  6. The Deputy Inspector General of Police, SB/DCT, Peshawar.
  7. The Assistant Inspector General of Police, Traffic KPK Peshawar.
  8. The Commandant Campus Peace Crops Peshawar.
  9. Sr: Superintendent of Police, Operation, Investigation & Traffic Peshawar.
  10. District Police Officers, Nowshera & Charsadda.
  11. SsP City, Cantt: Rural, HQrs: & Security CCP Peshawar.
  12. EC-II CCP Peshawar.
  13. Assistant Secret CCP Peshawar with the direction to inform this office about the "C" / incomplete ACRs of the conditionally confirmed / promoted to list "E" ASIs on the expiry of stipulated period.

**Attested**  
*[Signature]*  
 To be true copy  
 Advocate

20

6

*Amir D: 2*  
*(23)*

- From: The Capital City Police Officer,  
Peshawar. (Chairman)
- To: 1) Mr. Yamin Khan,  
SSP/Coordination, Peshawar. (Secretary)
- 2) Mr. Tahir Ayub Khan,  
SSP/Operation, Peshawar. (Member)
- 3) Mr. Muhammad Hussain,  
District Police officer, Nowshera. (Member)
- 4) Mr. Muhammad Nisar Ali Marwat,  
District Police officer, Charsadda. (Member)
- 5) Mr. Qazi Ghulam Farooq,  
Commandant CPC University Campus,  
Peshawar. (Member)
- 6) Mr. Bashir Khan,  
DSP/Legal. (Member)

No. *1992-97* /EC-I, dated Peshawar the *6/2/2012*.

Subject: DEPARTMENTAL PROMOTION COMMITTEE MEETING

Memo:

A Departmental Promotion Committee meeting is scheduled to be held on 07th February 2012 at 10.00 hours in the office of Senior Superintendent of Police Coordination, Peshawar to examine and decide the confirmation/promotion of of: SI's & ASI's (on list "E") of Capital City Police, Peshawar.

You are requested to attend the said meeting on due date

and time  
*[Faded stamp and illegible text]*

*[Signature]*  
FOR CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

**Attested**  
*[Signature]*  
To be true copy  
Advocate

**(Most Immediate)**

- From:- The Capital City Police Officer,  
Peshawar.
- To :-
1. The Inspector General of Police,  
NH & Motorway Police, Islamabad.
  2. The Addl: Inspector General of Police,  
Investigation Khyber Pakhtunkhwa, Peshawar.
  3. The Addl: Inspector General of Police,  
Special Branch Khyber Pakhtunkhwa, Peshawar.
  4. The Commandant,  
Elite Force, Khyber Pakhtunkhwa, Peshawar.
  5. The Asstt: Inspector General of Police,  
Traffic Khyber Pakhtunkhwa, Peshawar.
  6. The Senior Superintendent of Police,  
Operations, Investigation & Traffic Peshawar.
  7. The Commandant CPC,  
University Campus, Peshawar.
  8. The DPOs Nowshera & Charsadda.
  9. The Superintendent of Police,  
HQrs: Cantt:, City, Rural & Security.

No. 19982013/EC-I, dated Peshawar the, 6/2/2012.

Subject: **PROMOTION TO THE RANK OF OFFG:SI.**

Memo:

Please direct the following Upper/Lower Subordinates of Capital City Police Peshawar to attend the Departmental Promotion Committee Meeting on 07-02-2012 at 10.00 hrs in connection with their confirmation/promotion in the office of Senior Superintendent of Police, Coordination, Peshawar.

| S#  | Name and Number                       | Present Posting       |
|-----|---------------------------------------|-----------------------|
| 1.  | Offg: SI Tayyab Jan No.567/P          | RI Police Lines Pesh: |
| 2.  | Offg: SI Rajjab Ali No.667/P          | SHO PS Hayatabad      |
| 3.  | Offg:ASI Faiz Hussain No. 247/P       | CCP, Peshawar         |
| 4.  | Offg ASI Ali Gohar 562/P              | CCP, Peshawar         |
| 5.  | Offg ASI Shahre-Yar 416/P             | CCP, Peshawar         |
| 6.  | Offg ASI Shaheen Ullah 489/P          | CCP, Peshawar         |
| 7.  | Offg ASI Niaz Muhammad 950/P          | CPC University Campus |
| 8.  | Offg ASI Roman Shah 951/P             | Traffic               |
| 9.  | Offg ASI Khan Gul 952/P               | CCP Peshawar          |
| 10. | Offg ASI Bahader Shah 953/P           | Traffic               |
| 11. | Offg ASI Umar Zaman 954/P             | CCP, Peshawar         |
| 12. | Offg ASI Muhammad Ayub 955/P          | Spl: Branch           |
| 13. | Offg ASI Javed Iqbal 956/P            | CCP, Peshawar         |
| 14. | Offg ASI Gul Wali 957/P               | CCP, Peshawar         |
| 15. | Offg ASI Doran Shah 958/P             | CCP, Peshawar         |
| 16. | Offg ASI Abdul Rashid 959/P           | CCP, Peshawar         |
| 17. | Offg ASI Zubair Khan 960/P            | CCP, Peshawar         |
| 18. | Offg ASI Javed Akhtar 961/P           | CCP, Peshawar         |
| 19. | Offg ASI Fida Muhammad 962/P          | Spl: Branch           |
| 20. | Offg ASI Muhammad Ikram 963/P         | Operation Room CPO    |
| 21. | Offg ASI Israr Muhammad 964/P         | CCP, Peshawar         |
| 22. | Offg ASI Naik Zaman 965/P (SI on ACB) | Traffic               |
| 23. | Offg ASI Khlal Roz 966/P              | CCP, Peshawar         |

**Attested**  
*[Signature]*  
**To be true copy**  
**Advocate**

25

|    |  |                 |
|----|--|-----------------|
| 24 | Offg ASI Raza Bad Shah 967/P               | Traffic         |
| 25 | Offg ASI Muhammad Raghob 968/P             | CCP, Peshawar   |
| 26 | Offg ASI Malik Ahmed 969/P                 | CCP, Peshawar   |
| 27 | Offg ASI Wazir Muhammad 970/P              | Motorway Police |
| 28 | Offg ASI Gul Sher 971/P                    | CCP Peshawar    |
| 29 | Offg ASI Noor Rehman 972/P                 | CCP Peshawar    |
| 30 | Offg ASI Zafar Khan 973/P                  | CCP Peshawar    |
| 31 | Offg ASI Zia Ullah 974/P                   | Traffic         |
| 32 | Offg ASI Raza Muhammad 975/P               | Traffic KPK     |
| 33 | Offg ASI Yousaf Jan 976/P                  | CPC             |
| 34 | Offg ASI Sikandar Shah 977/P (SI on ACB)   | CCP, Peshawar   |
| 35 | Offg ASI Muhammad Anwar 978/P              | CCP, Peshawar   |
| 36 | Offg ASI Jan Muhammud 979/P                | Traffic KPK     |
| 37 | Offg ASI Inayat Ullah 980/P                | CCP, Peshawar   |
| 38 | Offg ASI Abdur Rauf 981/P                  | Traffic         |
| 39 | Offg ASI Mohib Gul 982/P                   | CCP, Peshawar   |
| 40 | Offg ASI Khurshid 983/P                    | Charsadda       |
| 41 | Offg ASI Razi Khan 984/P                   | CCP, Peshawar   |
| 42 | Offg ASI Muhammad Akram 985/P              | CCP, Peshawar   |
| 43 | Offg ASI Muhammad Riaz 986/P               | Traffic         |
| 44 | Offg ASI Farhad Hussain 987/P              | Traffic         |
| 45 | Offg ASI Swal Faqir 988/P                  | Traffic         |
| 46 | Offg ASI Sanaullah 1/P                     | CCP, Peshawar   |
| 47 | Offg ASI Yousaf Khan 989/P                 | CCP, Peshawar   |
| 48 | Offg ASI Riaz Ahmed 990/P                  | CCP, Peshawar   |
| 49 | Offg ASI Haider Raza 991/P                 | CCP, Peshawar   |
| 50 | Offg ASI Zahoor Rehman 992/P (SI on ACB)   | CCP, Peshawar   |
| 51 | Offg ASI Roze Amin 993/P                   | CCP, Peshawar   |
| 52 | Offg ASI Noorul Hadi 994/P                 | Traffic         |
| 53 | Offg ASI Faqir Hussain 995/P               | Traffic         |
| 54 | Offg ASI Dilfaraz 996/P                    | CCP, Peshawar   |
| 55 | Offg ASI Zafar Ali 997/P                   | CCP, Peshawar   |
| 56 | Offg ASI Muhammad Ibrahim 998/P            | CCP, Peshawar   |
| 57 | Offg ASI Tilawat Khan 999/P                | CCP, Peshawar   |
| 58 | Offg ASI Faheem Ullah 1000/P               | Traffic         |
| 59 | Offg ASI Zahir Shah 1001/P                 | CCP, Peshawar   |
| 60 | Offg ASI Khalil ur Rehman 1002/P           | CCP, Peshawar   |
| 61 | Offg ASI Sardar Hussain 1003/P (SI on ACB) | CCP, Peshawar   |
| 62 | Offg ASI Sher Rehman 1004/P                | CCP, Peshawar   |
| 63 | Offg ASI Ali Bahader 1005/P                | CCP, Peshawar   |
| 64 | Offg ASI Qeemat Gul 1006/P                 | CCP, Peshawar   |
| 65 | Offg ASI Fazal Khaliq 1007/P               | CCP, Peshawar   |
| 66 | Offg ASI Wali Zada 1008/P                  | Traffic         |
| 67 | Offg ASI S. Rokhan Shah 1009/P             | Traffic         |
| 68 | Offg ASI Shamsher Ali 1010/P               | Traffic         |
| 69 | Offg ASI Muhammad Israr 1011/P             | CCP, Peshawar   |
| 70 | Offg ASI S. Kamal Shah 1012/P              | CCP, Peshawar   |
| 71 | Offg ASI Ali Hussain 1013/P                | Elite Force     |
| 72 | Offg ASI Behram Gul 1014/P                 | CCP, Peshawar   |
| 73 | Offg ASI Sufaid Gul 1015/P                 | Traffic         |
| 74 | Offg ASI Ghulam Ali 1016/P                 | Spl: Branch     |
| 75 | Offg ASI Diyar Khan 1017/P                 | Traffic         |
| 76 | Offg ASI Sald Malik 1018/P                 | CCP, Peshawar   |
| 77 | Offg ASI Ahmed Jamal 1019/P                | Traffic         |
| 78 | Offg ASI Muhammad Tahir 1020/P             | Traffic         |
| 79 | Offg ASI Khushal Khan 6/P                  | CCP, Peshawar   |
| 80 | Offg ASI Masal Khan 1021/P                 | CCP, Peshawar   |
| 81 | Offg ASI Misri Gul 1022/P                  | Traffic         |
| 82 | Offg ASI Fazal Rahim 1023/P                | CCP, Peshawar   |
| 83 | Offg ASI Shah Rasool 1024/P                | CCP, Peshawar   |
| 84 | Offg ASI Himayat Ullah 1025/P              | Traffic KPK     |
| 85 | Offg ASI Abdul Hamid 1026/P                | Traffic         |
| 86 | Offg ASI Muhammad Bashir 1027/P            | Traffic         |
| 87 | Offg ASI Hassan Khan 1028/P                | CCP, Peshawar   |
| 88 | Offg ASI Fazal Mabood 1029/P               | Traffic         |

Attested  
To be true copy  
Advocate

26

|     |                                     |                  |
|-----|-------------------------------------|------------------|
| 89  | Offg ASI Nisar Ahmad 1030/P         | Traffic          |
| 90  | Offg ASI Abid Rashid 1031/P         | Spl: Branch      |
| 91  | Offg ASI Bakht Diyan 1032/P         | CCP, Peshawar    |
| 92  | Offg ASI Burhan ud Din 1033/P       | CCP, Peshawar    |
| 93  | Offg ASI Muhammad Sabir 1034/P      | CCP, Peshawar    |
| 94  | Offg ASI Inam Ullah 1035/P          | Traffic          |
| 95  | Offg ASI Hassan Gul 1036/P          | CCP, Peshawar    |
| 96  | Offg ASI Khalid ur Rehman 1037/P    | CCP, Peshawar    |
| 97  | Offg ASI Ghulam Haider 1038/P       | Traffic          |
| 98  | Offg ASI Waqar Haider 1039/P        | Spl: Branch      |
| 99  | Offg ASI Hassan Zameer 1040/P       | CCP, Peshawar    |
| 100 | Offg ASI Rooh ul Amin 1041/P        | Traffic          |
| 101 | Offg ASI Murad Ali 1042/P           | Traffic          |
| 102 | Offg ASI Ikram Ullah 1043/P         | CCP, Peshawar    |
| 103 | Offg ASI Akbar Khan 1044/P          | Spl: Branch      |
| 104 | Offg ASI Sabir Ali 1045/P           | Traffic          |
| 105 | Offg ASI Ihsan Shah 7/P (SI on ACB) | CCP, Peshawar    |
| 106 | Offg ASI Muhammad Ibrahim 1046/P    | CCP, Peshawar    |
| 107 | Offg ASI Islam Shah 1047/P          | CCP, Peshawar    |
| 108 | Offg ASI Anwar Ali No.950/NSR       | Nowshera         |
| 109 | Offg ASI Qaisro Khan No.1382        | PS Regi          |
| 110 | ASI (on ACB) Hayat Gul No.238       | Traffic          |
| 111 | ASI (on ACB) Laiq Shah No.4005      | Judicial Complex |
| 112 | IHC Misal Khan No. 315              | PBI              |
| 113 | IHC Muslim Khan No.1021             | PS U/Town        |
| 114 | IHC Ijaz Ullah No. 4024             | PS Sarband       |

*[Signature]*  
FOR CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

No. J-016/EC-1

Copy of above is sent to Incharge Emergency Control Room (15) Gul Bahar to inform the above named officials to attend the DPC meeting on due date and time.

**Attested**  
*[Signature]*  
To be true copy,  
Advocate

27. Aug 11

جناب عالی!

گزارش ہے کہ مسائل کا تعلق نوشہرہ ڈسٹرکٹ سے ہے۔ سال 2008 میں صوبائی حکومت نے ضلع ہذا مردان رجمنٹ سے علیحدہ کر کے CCP  
پشاور کیہ اتحاد کیا سیناریو کے مسئلہ پر جناب PPO صاحب و صاحب KPK پشاور نے ایک بورڈ قائم کی جنہوں نے بحوالہ نمبر 922/ES  
مورخہ 21-03-2009 کو یہ فیصلہ کیا کہ ضلع ہذا کے جن پولیس آفسران نے CCP پشاور کے ساتھ لی ان اختیار کی ہے۔ ان کو CCP پشاور میں PTC  
ہنگو کے رزلٹ کے مطابق سیناریو دی جانے گی۔ ہمارا پردھوشن بحوالہ نوٹیفیکیشن نمبر 1-EC-16537/26-11-2009 مورخہ 26-11-2009 بحیثیت ASI: Offg  
چکا ہے۔ اب CCPO صاحب پشاور نے بحوالہ نوٹیفیکیشن نمبر 1-EC-15183/27-09-2011 مورخہ 27-09-2011 کو صرف CCP پشاور کے ASIs کی  
کنٹریشن کر کے اور (E) لسٹ میں پردھوشن کیے ہیں جبکہ ضلع نوشہرہ اور چارسدہ پولیس کنٹراکٹرز کے ہیں۔ جو کہ ان دونوں اضلاع کے پولیس کے ساتھ  
پردھوشن کے سلسلہ میں نا انصافی ہے۔

بذریعہ درخواست استدعا ہے کہ جناب IGP صاحب کے نوٹیفیکیشن نمبر 922/ES مورخہ 21-03-2009 کو مد نظر رکھتے ہوئے مسائل کو  
PTC ہنگو کی رزلٹ کے مطابق سیناریو دے کر لسٹ (E) میں پردھوشن دینے کا حکم صادر فرما کر ہنگو فرمایا جائے۔ تاحیات دعا گور ہیں گے۔ (نوٹیفیکیشن نمبر  
1-EC-16537/26-11-2009 مورخہ 26-11-2009 اور نوٹیفیکیشن نمبر 1-EC-15183/27-09-2011 مورخہ 27-09-2011 مہرا لے ہیں)

دعا رکن  
میں نوازش ہوگی

العارض

بہادر شیر Asi نمبر 118

Attested  
To be true copy  
Advocate



28

جناب عالی!

گزارش ہے کہ ہم ساکنان کا تعلق نوشہرہ ڈسٹرکٹ سے ہے۔ سال 2008 میں صوبائی حکومت نے ضلع ہذا مردان رجمن سے علیحدہ کر کے CCP پشاور کیساتھ ملج کیا سیناریٹی کے مسئلہ پر جناب PPO صاحب KPK پشاور نے ایک بورڈ قائم کی جنہوں نے بحوالہ میو نمبر 922/ES مورخہ 21-03-2009 کو یہ فیصلہ کیا کہ ضلع ہذا کے جن پولیس آفسران نے CCP پشاور کے ساتھ لی ان اختیار کی ہے۔ ان کو CCP پشاور میں PTC ہنگو کے رزلٹ کے مطابق سیناریٹی دی جائے گی۔ ہمارا پر دموشن بحوالہ نوٹیفیکیشن نمبر 1-EC-16537/ مورخہ 26-11-2009 بحیثیت ASI: Offg: چکا ہے۔ اب CCPO صاحب پشاور نے بحوالہ نوٹیفیکیشن نمبر 1-EC-15183/ مورخہ 27-09-2011 کو صرف CCP پشاور کے ASIs کی کنفرینس کر کے اور (E) لسٹ میں پر دموڈ کئے ہیں جبکہ ضلع نوشہرہ اور چارسدہ پولیس کو نظر انداز کئے ہیں۔ جو کہ ان دونوں اضلاع کے پولیس کے ساتھ پر دموشن کے سلسلہ میں نا انصافی ہے۔

پذیریدہ درخواست استدعا ہے کہ جناب IGP صاحب کے نوٹیفیکیشن نمبر 922/ES مورخہ 21-03-2009 کو مد نظر رکھتے ہوئے ساکنان کو PTC ہنگو کی رزلٹ کے مطابق سیناریٹی دے کر لسٹ (E) میں پر دموشن دینے کا حکم صادر فرما کر مشکوٰۃ فرمایا جائے۔ تا حیات دعا گو ہیں گے۔ (نوٹیفیکیشن نمبر 1-EC-16537/ مورخہ 26-11-2009 اور نوٹیفیکیشن نمبر 1-EC-15183/ مورخہ 27-09-2011 ہمراہ لکھ ہیں)

میں نوازش ہوگی

العارض

1. زرد ادنیٰ نمبر ASI/525 ضلع نوشہرہ
2. محمد عالم نمبر ASI/411
3. محمد حمزہ نمبر ASI/636
4. شیر محمد نمبر ASI/477
5. فیاض محمد نمبر ASI/494
6. جمشید نمبر ASI/46
7. محمد نعیم نمبر ASI/57
8. بہادر شیر نمبر ASI/118 ✓
9. افتخار حسین نمبر ASI/579
10. صفدر علی نمبر ASI/270

Attested  
To be true copy  
Advocate

From: -

The District Police Officer,  
Nowshera.

29

To: -

The Capital City Police Officer,  
Peshawar.

No.

8931

/EC, Dated Nowshera the, 13/10/2011


Subject:

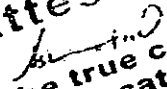
APPLICATION FOR THE GRANT OF SENIORITY.

MEMO:

Enclosed kindly find herewith an joint application alongwith connected documents submitted by ASIs of this District Police for the grant of seniority according to the instruction/Direction issued vide PPO, NWFP, Peshawar Office memo: No. 18564-65/E-II, dated 23.7.2009 with their colleagues for further necessary action please.

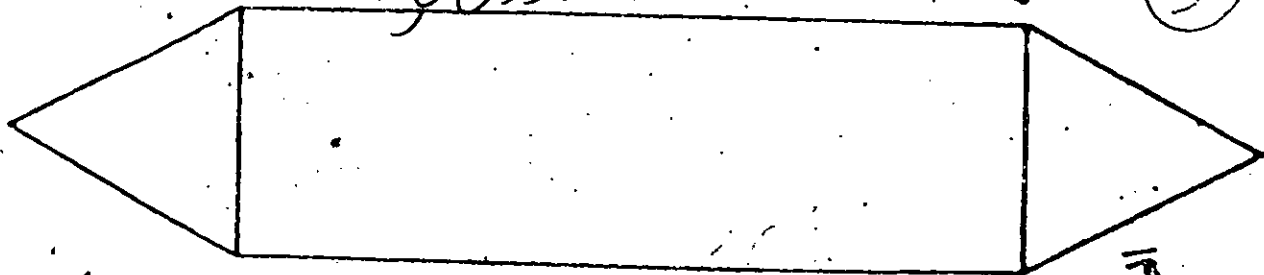
Encl: as above.

  
District Police Officer,  
Nowshera.

Attested  
  
To be true copy  
Advocate.

# بعدالت سرولسن ٹریبونل کی طرف

(35)



محکمہ منجانب ایسٹرنٹ

بنام PPO ملکہ

بھارت

موضوع

مقدمہ

دعویٰ

جبرم

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کھردگی کی کارروائی متعلقہ آن مقام کے لئے اسٹریٹ علی صندریا کے لئے مقررہ کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو کرنے راضی نامہ و تقررات و فیصلہ برحلف دیے جواب دی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق فراہم پر دستخط کرنے کا اختیار ہوگا۔ نیز بعد رت ہم پیروی یا ڈگری کیغرفہ یا اپیل کی برآمدگی اور دعویٰ نیز دائر کرنے اپیل ٹکرائی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تفریح کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پداختہ منظور و قبول ہوگا۔ و دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سبب سے ہوگا۔ اگلے کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز تقابلاً و خرچہ کی ذمہ داری کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا ذکات نامہ لکھنا کہ سند ہے۔

سید

ماہ

المترجم

دعا کرتا ہوں کہ

بقام  
 کے لئے منظور ہے۔  
 and  
 Aufstn

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

Service Appeal No. 213/2012

Bahader Sher No. 118  
District Nowshera

.....Appellant

*V*ersus

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar.
3. District Police Officer, Nowshera.

.....Respondents

**PARAWISE REPLY ON BEHALF OF RESPONDENTS**

**Respectfully Sheweth: -**

**PRELIMINARY OBJECTIONS**

1. That the appellant has got no cause of action.
2. That the appeal is badly time-barred.
3. That the appeal is bad in law.
4. That the appellant is estopped from moving the instant appeal due to his own conduct.
5. That the appeal is not maintainable in its present form.
6. That the appellant has not come to the Honourable Tribunal with clean hands.
7. The appeal is bad in law due to mis-joinder and non-joinder of parties.

**On Facts**

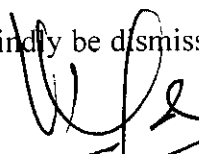
1. Relates to record.
2. Correct.
3. Correct.
4. Correct to the extent of issuing/maintaining seniority list of ASIs by the Regional Police Office, however, the issuance of the said list is under process.
5. Correct to the extent of meeting of the DPC on 16-07-2009 and its decision which is annexed as Annexure "B" with the memo of appeal.
6. Explained in para 4 above.
7. Incorrect and denied. The appellant has not been discriminated. The DPC meeting was held on 15, 16 and 17 September, 2011 (copy annexed as Annexure "C" with the memo of appeal) and the promotion was notified on 27-09-2011. The name of the appellant was not considered for promotion due to the fact that the incumbents mentioned in this para were already promoted to the rank of offg: ASIs before the appellant was promoted to the said rank. Copy is Annexure "A & B".


8. Correct. However, it is worth mentioning that these incumbents were promoted to the rank of offg: ASIs before the appellant was promoted to the said rank.
9. Incorrect and denied. Joint application of the appellant as well as his other colleagues was submitted before the Capital City Police Officer, Peshawar vide this office letter No. 478/EC dated 16-01-2012, which was replied by the CCPO, Peshawar vide letter No.4254/EC-I, dated 12-03-2012, mentioning therein that the appellant alongwith 92 colleagues was transferred with lien from Mardan Region to CCPO, Peshawar vide order issued on 04-08-2009. The colleagues of his term were already promoted as offg: ASIs during the year 2008 against the available vacancies of Peshawar District. Hence the officials promoted in 2008 before the transfer of lien of the appellant were senior to him, thus he had no right to claim seniority with their colleagues of Peshawar District. (Copies are Annexure "B,C & D").
10. Needs no comments.

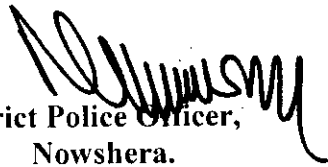
**On grounds**

- A. Incorrect and denied. As explained in paras above.
- B. Incorrect and denied. The appellant was junior to the promotes.
- C. Incorrect and denied. As explained in paras above.
- D. The respondents also seek permission of this Honourable Tribunal to rely on additional grounds at the time of arguments.

It is, therefore, humbly prayed that the appeal may kindly be dismissed with cost.

  
Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar.  
Respondent No. 1

  
Capital City Police Officer,  
Peshawar.  
Respondent No. 2

  
District Police Officer,  
Nowshera.  
Respondent No. 3

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

Service Appeal No. 213/2012

Bahader Sher No. 118  
District Nowshera

.....Appellant

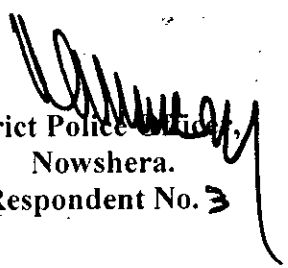
*V*ersus


1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar.
3. District Police Officer, Nowshera.

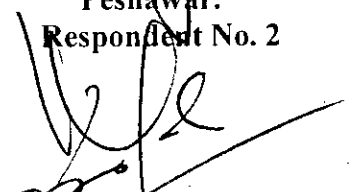
.....Respondents

**AFFIDAVIT**

We the respondent No. 1,2 & 3 do hereby solemnly affirm and declare on Oath that the contents are parawise comments are true and correct to the best of our knowledge and belief and nothing has been concealed from the honourable tribunal.

  
District Police Officer,  
Nowshera.  
Respondent No. 3

  
Capital City Police Officer,  
Peshawar.  
Respondent No. 2

  
Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar.  
Respondent No. 1

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

Service Appeal No. 213/2012

Bahader Sher No. 118  
District Nowshera

.....Appellant


*V*ersus


1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar.
3. District Police Officer, Nowshera.


.....Respondents

**AUTHORITY LETTER**

We the respondent No. 1,2 & 3 do hereby authorize Mr. Ijaz Hussain Sub Inspector, Legal, Nowshera to appear on our behalf before the honourable Service Tribunal Khyber Pakhtunkhwa, Peshawar in the above cited appeal. He is also authorized to submit any document required by the honourable Tribunal.

  
District Police Officer  
Nowshera.  
Respondent No. 3

  
Capital City Police Officer,  
Peshawar.  
Respondent No. 2

  
Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar.  
Respondent No. 1

1

**BEFORE THE KHYBER PAKHTUNKWA SERVICE  
TRIBUNAL, PESHAWAR.**

**Service Appeal No. 213 /2012**

Bahadar Sher Officiating ASI No.118 Officiating ASI  
Special branch Nowshera .....Appellant.

Versus

The Provincial Police Officer and others.....Respondents.

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**REJOINDER ON BEHALF OF PETITIONER IN  
RESPONSE TO PARA WISE COMMENTS FILED  
BY RESPONDENTS NO.**

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Respectfully Sheweth,

Preliminary objections raised by answering Respondents are erroneous and frivolous, as having no factual and legal backing. The respondents have failed to explain as why the appellant has got no locus standi and cause of action, how the petition hit by limitation, how appellant is estopped by his conduct, how the appellant is not an aggrieved person in terms of section 4 of the KPK Service Tribunal Act, 1974 and how the appeal is not maintainable. No plausible explanation has been provided/submitted by the answering respondent in support of their contentions. No specific and due objection regarding the controversial question of facts involved in the instant appeal has been raised, therefore, the petitioner is unable to submit proper rejoinder to the preliminary objections raised by the respondents. Appellant deny the objections in toto.



So for the question of jurisdiction of this Honourable Tribunal is concerned, in this respect, it is humbly submitted that the terms and conditions of appellant's service are governed by KPK Civil Servant Act, 1973, which confer jurisdiction to KPK Service Tribunal.

**Facts:**

1. That reply to para No.1 of the appeal by the answering respondents is incorrect. The service record of appellant is in the immediate possession of the respondent. The answer to the para is just to avoid admission.
2. That para No.2 & 3 has been admitted by the answering respondents.
3. That para No.4 of the appeal has been admitted by the answering respondents to the effect that the seniority list of the officiating ASIs of the regional district has to be maintain by the regional office. The answering respondent has further admitted that the seniority list is under process.  
The Provision of Vol:II, Chapter-XIII Rule 13.9 Police Rules, 1934 also provide that combined seniority list of officiating ASIs shall be prepared and maintained by the regional office and the regional officer shall be competent authority for appointment against the post of ASIs. The seniority position shall be record from the date of passing Intermediate Course.

It is worthy to note that District Nowshehra has

been detached from Mardan Region and attached with Peshawar Region in the year, 2008.

Upon merger, the respondents were under legal obligation to safeguard the terms and conditions of police officer in the newly region including their seniority and promotion.

Law was not complied with in due course of time. The matter has been delayed till the date. This delay adversely effected the service careers of the appellant and others for the reasons that respondent No.2 inspite of considering officiating ASIs of the whole region considered only officiating ASIs belonging to Peshawar District only for confirmation and promotion to list "E", which is not only sheer discrimination but also illegal and against the provision of Rule 13.9 (Vol:II, Chapter XIII, Police Rule, 1934).

In case seniority list would have been prepared as per law, appellant would be able to secure confirmation as ASI and subsequent promotion to the promotion list "E" but this obligation on the part of respondents as per law was not adhered to on proper time, which resulted the deprivation of appellant alongwith other from their legitimate right of confirmation, bringing their names on promotion list "E" and subsequent promotion to the rank of officiating sub-inspector.

Thus under the cercomstances, it is urgent legal requirment that the impugned action taken by the respondents is reviewed on the score of judicial order and the respondents are directed to prepare joint seniority list of all officiating ASIs belonging

to the whole region as per spirit of Rule 13.9 and than confirm all those ASIs as against their post, bring their names on promotion list "E" and finally promote all eligible and qualified to the rank of sub-inspector by giving it retrospective effect.

4. That para No.5 of the appeal has been admitted by the answering respondents that the seniority list has to be maintain by the regional office, hence upon merger of Nowshera, the office of respondent No.2 was under legal obligation to prepare combined seniority list of the officiating ASIs belonging to the whole region as per law but respondent No.2 failed to adhered the law and this failure on the part of respondent caused career damage to the appellant and others.
5. That no proper reply has been submitted by the answering respondents to para No.6 of the appeal.
6. That reply to para No.7 of the appeal by the answering respondents is correct to the extent that DPC meeting was held on 15, 16 & 17 September, 2011, but appellant was not considered only for the reason that seniority list of whole region was not prepared as per law. Respondent malafidely considered ASIs belonging to district Peshawar and confirmed them against substantive vacancies and subsequently brought them on promotion list "E"
7. That para No.8 of the appeal has been admitted by the answering respondents as correct. The promotion of the ASIs belonging to peshawar

district is illegal.

8. That reply to para No.9 of the appeal is incorrect, hence denied. The whole process of promotion has been carried out illegally. Appellant along with others have been deprived from their legitimate right of promotion. Promoted incumbents are not senior to appellant. Seniority of ASIs shall be record from the date of passing "Intermediate School Course".

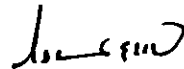
**Grounds: -**

- A. That no proper answer has been submitted by the answering respondent to the grounds of appeal, hence denied in toto.

It is therefore, humbly prayed that the para wise comments of Respondents may kindly be rejected and petition as prayed for may graciously be accepted.

Appellant

Through



Ashraf Ali Khattak,  
Advocate, Peshawar

Dated: \_\_\_\_\_ / 06/ 2013

**Affidavit**

I, Bahadar Sher Officiating ASI No.118 Officiating ASI ~~Special branch, Nowshera~~ ~~Special branch,~~ Nowshera Special branch, Nowshera, Nowshera, Special branch, Nowshera, do hereby affirm and declare on oath that the contents of this rejoinder with attached documents are true and correct to the best of my knowledge.

Deponent 