

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

In Re:

Service Appeal No.1461-P/2023

Rehmat Ullah.....**Appellant**

VERSUS

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

I N D E X

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19-1-24

Through Appellants



Tariq Khan Hoti
Advocate High Court

Dated: 17.01.2024

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

In Re:
Service Appeal No.1461-P/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10610

Dated 17-1-2024

Rehmat Ullah.....**Appellant**

VERSUS

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

**RE-JOINDER ON BEHALF OF
APPELLANT TO THE COMMENTS
FILED BY RESPONDENT No.2 to 6**

Respectfully Sheweth:

Reply to the Preliminary Objections:

- a) **Para "A"** of the preliminary objections of the comments is incorrect, so denied. All the facts alongwith officials notification issued by the respondents No.2 to 6 from time to time are annexed with the main service appeal of the appellant.
- b) **Para "B"** of the preliminary objections of the comments is incorrect, so vehemently denied. The appellant was demoted by the respondents No.2 vide notification No. 579/Legal/E-I dated 15.03.2023 illegal, unlawful, against the law, malafidely and without legal justification. The appellant filed a representation

petition before the respondent No.2 through proper channel on 27.03.2023 vide dairy No.4959 and after completion of statutory period the appellant filed the instant service appeal before this Hon'ble Tribunal under the law.

- c) **Para "C"** of the preliminary objection of the comments is totally incorrect, so denied. The instant service appeal filed by the appellant is maintainable in its present form under the law, rules and constitution of the Islamic republic of Pakistan, 1973.
- d) **Para "D"** of the preliminary objection is totally illegal against the law and necessary parties were arrayed as respondents in the present service appeal, so denied.
- e) **Para "E"** of the preliminary objections is false and concocted, so denied. The respondents No.2 to 6 concealed all the material facts from this Hon'ble Tribunal.
- f) **Para "F"** of the preliminary objections of the comments is against the law, facts and rules, the appellant has come to this Hon'ble Tribunal with clean hand, as all facts are mentioned in the main appeal and nothing has been concealed from this Hon'ble Tribunal. So the objection of the respondents No.2 to 6 is strictly denied.

- g) **Para "G"** of the preliminary objections of the comments on behalf of respondents No.2 to 6 is incorrect, so denied. The respondents have got no cause of action/locus standi to file the comments as the respondent No.2 illegally, without lawful and legal justification demoted the appellant.

REPLY TO FACTS:

1. **Para No.1** of facts need no reply as admitted by the answering respondents.
2. **Para No.2** of facts is incorrect, so denied. Initially the appellant has qualified his lower school course from district Nowshera alongwith his lower school course batch mates namely (i).Faqir Khan (429), (ii).Hazrat Ali (776), (iii).Khalid Sher (436), (iv).Masud Ali, (716), (v).Rehmat Ullah (815), present appellant (815).

The appellant has qualified his intermediate school course and was brought on promotion list 'D' with effect from 01.10.1995 vide notification dated 24.03.1996. Later on the appellant qualified his upper school course on 20.03.2004 and in this respect vide notification No. 3937 dated 10.07.2004 was issued by the respondent/ department. It is important to mention here that in the said

notification at serial No.1 one Rahim Hussain was promoted to BPS-18 though notification dated 20.12.2023. All the 'D' list colleagues of the appellant either have been retired or dead. Moreover all the upper college course batched mates of the appellant either have been retired or died or promoted to the rank of superintendents of Police (BPS-18). **(Copies of notification are annexed as annexures A and B respectively).**

3. **Para No.3** of the comments of facts is incorrect, so denied. Initially the appellant was promoted as officiating ASI on 17.12.1995 and as per rules, 13 sub Rule-18 of police rules, 1934, the date of conformation of ASI of the appellant become 17.12.1997 (two years). The above mentioned rules are reproduce herein below

Police Rules 1934

13-18. Probationary period of promotion. – All Police Officers promoted in rank shall be on probation for two years, provided that the appointing authority may, by a special order in each case, permit period of officiating service to count towards the period of probation. On the conclusion of the probationary period a report shall be rendered to the authority empowered to confirm the promotion who shall either confirm the officer or revert him. In no case shall the period of probation be extended beyond two years and the confirming authority must arrive at a definite decision within a reasonable time soon

after the expiry of that period whether the officer should be confirmed or reverted. While on probation officers may be reverted without departmental proceedings. Such reversion shall not be considered reduction for the purpose of rule 16-4.

This rules shall not apply to constable and sub-inspectors promoted to the selection grade, whose case is governed by rules 13-5 and 13-14.

As per police rule 1934 and judgment rendered by the Apex Court in 2016 SCMR 1254 the relevant para "56" is reproduce herein below

56. There are six (06) promotion lists maintained in the Police Department as per seniority and qualification (Trainings and Promotional Courses) of the personnel in various ranks i.e.:-

- i. List-A, maintained in the District for Constables having 3 years' successful completion of probationary period and found fit for promotion to the List-B. (Rule 13.6).
- ii. List-B, maintained in the District for Constables, who are present in List-A and found eligible to be sent to Lower School Course, which is a promotional training for promotion to the rank of HC. (Rule 13.7).
- iii. List-C, maintained in the District for Constables, who have qualified Lower School Course and are eligible for promotion to the rank of Head Constable. (Rule 13.8).

- iv. *List-D, prepared in the District and forwarded to the Range DIGP for approval and maintenance of seniority list. This list includes Head Constables eligible for the promotion to the rank of ASI after successful completion of Intermediate School Course. (Rule 13.9).*
- v. *List-E, maintained by the Range DIGPs, containing confirmed ASI's, who are eligible for promotion to the rank of Sub-Inspectors. (Rule 13.10).*
- vi. *List-F, prepared by CPO on the recommendation of Range DIGPS and maintained by Central Police Office (CPO) on centralized basis, containing confirmed Sub-Inspectors, who have qualified Upper School Course and are eligible for the promotion to the rank of Inspectors. (Rules 13.15).*

So the case of the appellant does not falling into the ambit of out of turn promotion.

4. ***Para No.4** of facts of the comments is totally incorrect, so denied. As the details are explained in the above mentioned paras.*
5. ***Para No.5** needs no reply as admitted by the answering respondents.*
6. ***Para No.6** need no reply as admitted by the answering respondents.*
7. ***Para No.7** need no reply as admitted by the answering respondents.*

8. **Para No.8** of the comments of fact is incorrect so denied. The appellant was enlisted in list D on 01.10.1995 alongwith their "D" list Colleague vide notification dated 24.03.1996. After that the present appellant was promoted as officiate ASI till further order, as a special case w.e.f. 11.12.1995 vide notification dated 17.12.1995. That as per police rule 1934 rule 13 sub rule 18 the date of conformation of the appellant become i.e. 17.12.1997 (two years) but the appellant was comforted as ASI on 21.06.2003 vide notification dated 21.03.2003 after lapse of eight (8) years. The appellant was promoted as officiate SI vide order dated 31.05.2004 and later on the appellant was conformed as SI vide notification dated 03.04.2008. Through a notification issued by respondent No.2 vide order dated 20.05.2008, the present appellant was promoted as officiate inspector and subsequently the appellant was confirmed as Inspector vide notification dated 31.10.2013. Moreover on the recommendation of the Departmental Selection Committee meeting held on 16.10.2014, the respondent No.2 promoted the present appellant in the rank of DSP (Deputy Superintendent of Police) vide notification dated 24.10.2014. On 12.10.2022 the respondent No.2 through (AIG/legal) issued a notification vide order

dated 12.10.2022 whereby the respondent No.2 clearly admitted that the case of present appellant does not falling under the definition of out of turn promotion. Para No.4 of the said notification is reproduce herein below"

In this specific case of individual, reportedly his "D" list colleagues have been retired, even then, if he has not affected the seniority of his batch- mates and is placed at his right place in the seniority list with his batch mates, then it cannot became within out of turn. The competent authority may decide in the light of record and the directions of Apex court, please, subsequently a guide line was also issued by the AIG legal on behalf of respondent No.2 under the police rules 13.18.

Moreso, the respondent No.5 (C.C.P.O Peshawar) issued a notification on the application of the present appellant vide order dated 19.01.2022 whereby the respondent No.5 (C.C.P.O Peshawar) also admitted that case of the present appellant did not falling under the ambit of out of turn promotion, Paragraph 3 of the notification is reproduce herein below:

"All his seniors who have been brought on list "D" are now retired as his "D" list colleagues. Moreover, Dost Muhammad was retired as Sub Inspector on Superannuation (pension) while

Qeemat Gul was retired compulsorily as an IHC on 16.08.2001. Moreso, para 5 of the said notification is as under;"

"Furthermore, many of his juniors are promoted to the rank of DPS including Yar Nawab Khan, whose name was brought on promotion list "D" on 10.10.1998 and Naseem Hayat whose name was brought on promotion list "D" on 20.09.2000. The applicant was brought on promotion list "D" on 01.10.1995.

It is very strange and interesting that all the above mentioned notification issued from time to time by the respondents No.2 to 6 regarding the promotion of the present appellant are still intact but inspite of this fact the appellant was demoted through the impugned notification by respondent No.2 vide order dated 15.03.2023 which is not the mandate of law. Even no Board consists of senior police officers was yet constitute to examine and scrutinized the entire service record of the present appellant as per directions of the Apex Court Judgments mentioned in the impugned notification vide dated 15.03.2023.

So, in the above mentioned notification issued by the respondents No.2 and 5 from time and again, from all the angles, facts and circumstance, it is an admitted fact that no doubt the case of the present appellant does not falling under the definition of out of turn promotion/ accelerated promotion. Moreso the judgment of the Apex Court are not applicable to the case of present appellant except the Apex Court judgment **2006 SCMR 1254. (Copies of Notifications are annexed as annxure C, D & E respectively).**

9. **Para No.9** is incorrect, so denied.
10. **Para No.10** of the facts is incorrect, so denied. The appeal of the appellant is maintainable under the law as explained in the above mentioned Paras.
11. **Para No.11** of the facts is incorrect, so denied. All the facts, law and rules are mentioned in the above mentioned para. The mentioned judgments are not applicable to the case of the present appellant except the judgment of the Apex Court **2016 SCMR 1254.** The case of the present appellant does not falling into the ambit of out of turn promotion.

12. **Para No.12** of the comments need no reply as admitted by the answering respondents.
13. **Para No.13** of the facts is incorrect, so denied. As already explained in detailed in the above mentioned paras.
14. **Para No.14** of the comments of facts is incorrect so denied. The detail is mentioned in above paras.
15. **Para No.15** of the comments of the facts is incorrect, so denied. The answering respondents mislead and misguide this Hon'ble Tribunal. The answering respondents illegally and wrongly interpreted the judgments of the Hon'ble Peshawar High Court.
16. **Para No.16** of the comments needs no reply, as admitted by the answering respondents.
17. **Para No.17** of the comments of the facts is illegally incorrect, so denied. The detail is already explained in the above mentioned paras. The respondents No.2 and 5 issued two different notification No. CPO/CPB/262 dated Peshawar 6 September 2023 and notification No. 14463 EC-I, dated Peshawar the 18/08/2023. in light of the judgment of the

Hon'ble Peshawar High Court Peshawar which are self-contradictory.

The provincial government/respondent No.1 constituted Departmental Selection Board on 17.10.2023 and one of upper course colleague of the appellant namely Mr. Raheem Hussain was promoted to the rank of Superintendent of Police BPS-18. His name is placed at serial No.8 of the Notification No.SO (Police-II) HD/8-10/DSB&DPS /2023 dated 20.12.2023. The name of the present appellant was not enlisted in the said notification nor the case of the present appellant was discussed in the said DSB/Committee which is totally unjustified and not warranted by law.

That recently the present appellant was posted as DSP (BS-17) Security CCP Peshawar vide notification No. CPO/E-I/Transfer/Posting /83 dated 08.01.2024. **(Copies of the notifications are attached as annexure F, G, H & I respectively).**

REPLY TO GROUNDS:

A to I. Grounds "A" to "I" of the comments on behalf of the respondent No.2 to 6 are totally incorrect,

against law, facts and natural justice, ineffective upon the right of the present appellant, so denied. The detailed reply is mentioned in above paras "reply to preliminary objections" and "reply to the comments of facts".

It is, therefore, most humbly prayed that on acceptance of this re-joinder, the comments of the respondents may kindly be "struck down" and the service appeal may please be allowed as prayed for in the service appeal.

Appellants
Through



Tariq Khan Hoti
Advocate High Court

Dated: 17.01.2024

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

In Re:
Service Appeal No.1461-P/2023

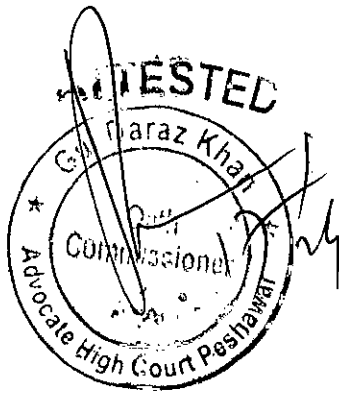
Rehmat Ullah.....**Appellant**

VERSUS

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

A F F I D A V I T

I, Tariq Khan Hoti, Advocate High Court do hereby solemnly affirm and declare on oath that the contents of the accompanying **Re-joinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.




ADVOCATE

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Annexure "A"

File 10/1

RESULT OF LOWER SCHOOL COURSE FOR THE TERM ENDING 20.9.1993 HELD AT POLICE TRAINING COLLEGE HANGU FOR NOTIFICATION BY THE DEPUTY COMMANDANT P.T.C HANGU.

The following students of Lower School Course appeared in the final examination held at Police Training College Hangu for the term ending 20.9.1993 and are declared passed according to order of merit as noted against each:-

<u>S.NO.</u>	<u>Name & No.</u>	<u>District</u>	<u>O.M No.</u>
1.	Zakir Hussain 148	Abbottabad	1
2.	Rahim Hussain 406	Kohistan	2
3.	Munir Ahmad 53	Abbottabad	3
4.	Mohammad Ishaq 1	Ganchi	4
5.	Zareef Khan 288	Swabi	5
6.	Abdul Wahid 2023	Islamabad	6
7.	Aqil Shah 1323	Swat	7
8.	Abdul Qayum 17	Peshawar	8
9.	Syed Shujat Ali 603	Muzafar Abad (A.K)	9
10.	Mushtaq Ahmad 248	D.I.Khan	9
11.	Tahir Shafiq 2506	Islamabad	10
12.	Ghulam Ali 419	Diamer	10
13.	Naseeb Khan 23	Kohistan	11
14.	Nadeem Ahmad 187	Islamabad	12
15.	Atteeq Ullah 2507	Islamabad	12
16.	Mohammad Rushtar 308	Manshera	13
17.	Sher Mast 19	Laki Marwat	14
18.	Umar Rehman 213	Kohistan	15
19.	Mohammad Saleem Tariq 381	D.I.Khan	15
20.	Waris Khan 140	Manshera	16
21.	Haq Nawaz 179	D.I.Khan	17
22.	Mohammad Arif 94	Peshawar	18
23.	Abdul Jalil 266	Haripur	18
24.	Haibat Ali 343	Islamabad	18
25.	Imam Hassan 56	Bannu	18
26.	Mohammad Javid 622	Muzafar Abad (A.K)	19
27.	Amir Zaman 3783	Malakand Levy	20
28.	Abdul Hameed 546	Manshera	21
29.	Lal Mohammad 217	Kohistan	22
30.	Khadim Hussain 3665	Malakand Levy	23
31.	Alam Zeb 811	Swat	23
32.	Shams-ul-Qamar 82	Kohistan	24
33.	Altaf Hussain 1036	Islamabad	24
34.	Mohammad Ismail 483	Islamabad	25
35.	Noor-ul-Wahab 1367	Mardan	26
36.	Munir Ahmad 2555	Islamabad	26
37.	Mohammad Farooq 1202	Islamabad	27
38.	Saif-ul-Malook 260	Lakki Marwat	27
39.	Wajid Ali 279	Manshera	28
40.	Sher Ahmad Khan 1014	Manshera	29
41.	Mohammad Nawaz 87	Bannu	30
42.	Mohammad Latif 1790	Manshera	31
43.	Mohammad Saeed	Islamabad	31
44.	Islah-u-Din 147	Abbottabad	31
45.	Mohammad Farooq	Peshawar	32
46.	Mohammad Amin	Abbottabad	33
47.	Ghulam Mortaza	Swat	33
48.	Ghulam Rabbani	Abbottabad	34
		D.I.Khan	34

See
10/1

Result of lower school course for the term ending 20.09.1993 held at police training college Hangu for notification by the deputy commandant P.T.C Hangu

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The following students of Lower School Course appeared in the final examination held at Police Training College Hangu for the term ending on 20.09.1993 and are declared passed according to Order of merit as noted against each:-

S.No.	Name & No.	District	C.M No.
1.	Zakir Hussain 148	Abbottabad	1
2.	Rahim Hussain 456	Kohistan	2
3.	Munir Ahmad 53	Abbottabad	3
4.	Muhammad Ishag	Ganchi	4
5.	Zareef Khan 288	Swabi	5
6.	Abdul Wahid 2023	Islamabad	6
7.	Aqil Shah 1323	Swat	7
8.	Abdul Qayum 17	Peshawar	8
9.	Syed Shujat Ail 603	Muzafar Abad (A.K)	9
10.	Mushtaq Ahmad 248	D.I.Khan	9
11.	Tahir Shafiq 2546	Islamabad	10
12.	Ghulam Ali 419	Diamer	10
13.	Naseeb Khan 23	Kohistan	11
14.	Nadeem Ahmad 187	Islamabad	12
15.	Atteeq Ullah 2587	Islamabad	12
16.	Mohammad Rustam 3 8	Mansehra	13
17.	Sher Mast 19	Lakki Marwat	14
18.	Umar Rehman 213	Kohistan	15
19.	Mohammad Saleem Tariq 381	D.I.khan	15
20.	Waris Khan 140	Peshawar	16
21.	Haq Nawaz 179	Mansehra	17
22.	Mohammad Arif 93	Peshawar	18
23.	Abdul Jalil 266	Haripur	18
24.	Haibat Ali 343	Islamabad	18
25.	Imam Hussain 56	Bannu	19
26.	Mohammad Javied 622	Muzafar Abad (A.K)	20
27.	Amir Zaman 3783	Malakand Levy	21
28.	Abdul Hameed 546	Mansehra	22
29.	Lal Mohammad 217	Kohistan	23
30.	Khadim Hussain 3665	Malakand Levy	23
31.	Alam Zeb 811	Swat	24
32.	Shams ul Qamar 62	Kohistan	24
33.	Altaf Hussain 1386	Islamabad	25
34.	Mohammad Ismail 483	Islamabad	26
35.	Noor Ul Wahab 1367	Mardan	26
36.	Munir Ahmad 2555	Islamabad	27
37.	Mohammad Farooq 1202	Islamabad	27
38.	Saif ul Malook 260	Lakki Marwat	28
39.	Wajid Ali 279	Mansehra	29
40.	Sher Ahmad khan 1014	Bannu	30
41.	Mohamad Latif 799	Mansehra	31
42.	Mohammad Nawaz 87	Islamabad	31
43.	Mohamad Saeed	Abbottabad	32
44.	Islah ud Din 147	Peshawar	33
45.	Mohammad Farooq	Abbottabad	33
46.	Mohammad Amin	Swat	34
47.	Ghulam Murtaza	Abbottabad	34
48.	Ghulam Rabani	D.I.Khan	34
49.			
50.			
51.			
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53.	Noor Zaman 73	Swat	37
54.	Anwar Khan 90 (ETC Hanga)	Abbottabad	37
55.	Namdar Khan 187	Chrsadda	37
56.	Mohammad Raziq 438	Manshera	38
57.	Shahbaz Ali 2566	Kotli (A.K)	39
58.	Dost Mohammad 48	Swat	40
59.	Faqir Khan 429	Nowshera	41
60.	Sher Akbar 778	Chitral	42
61.	Sher Mohammad Khan 381	D.I.Khan	43
62.	Mir Afzal 571	Islamabad	44
63.	S. Sarfaraz Hussain 127	Rawla Kot (A.K)	44
64.	Amir Bahadur 705	Swat	45
65.	Mohammad Perviz 1124	Swat	45
66.	Abdul Akbar 1048	Swat	45
67.	Mohammad Sajjad 94	Islamabad	45
68.	Rahim Ullah 29 (PTC Hanga)	Dir	45
69.	Gul Faraz 395	Peshawar	46
70.	Zakir Ullah 3077	Peshawar	47
71.	Khadim Hussain 382	D.I.Khan	47
72.	Naeem Khan 348	Malakand Levy	47
73.	Nasrat Ali 2153	Peshawar	48
74.	Shah Nawaz 210	Mirpur (A.K)	49
75.	Farhad Ali 186	Peshawar	49
76.	Hussain 141	Skardo (H.A)	50
77.	Yousaf Khan 4173	Malakand Levy	51
78.	S. Ayyaz Khan 909	Bannu	52
79.	Mohammad Arif 2048	Mirpur (A.K)	53
80.	Muhabat Khan 1064	Swat	54
81.	Mukhtiaz Ahmad 446	Swabi	55
82.	Syed Kadeer Ali 94	Ghazar ✓	55
83.	Falih Zar 21	Bunir	55
84.	Rustam 792	Bannu	55
85.	Khurshid 1211	Bannu	55
86.	Tariq Mehmood 281	Islamabad	55
87.	Nisar Mohammad 255	Chrsadda	56
88.	Rashid Ahmad 11	Lahore/FIA	56
89.	Hafiz-ur-Rehman 259	Tank	57
90.	Ghulam Haider 133	Islamabad	57
91.	Bakhtiar 2924	Malakand Levy	58
92.	Mohammad Sher 208	Swat	59
93.	Nawab Khan 280	Bannu	59
94.	Mohammad Jaffar	Rawalpindi/FIA	59
95.	Said Mohammad 3	Bunir	60
96.	Mohammad Ayub 1319	Malakand Levy	61
97.	Sher Alam 200	S.B Peshawar	62
98.	Abdul Aziz 6	Swabi	62
99.	Abdul Majeed 452	Islamabad	62
100.	Taj-Ud-Din	Gilgit/FIA ✓	62
101.	Sardar Khan 3673	Malakand Levy	62
102.	Muzafar Khan 3900	Malakand Levy	62
103.	Shireen 1732	Peshawar	62
104.	Hussain Shah	S.B Peshawar	63
105.	Izat Mohammad 714	Swat	63
106.	Mohammad Ayub Khan	S.F Gilgit ✓	63
107.	Mohammad Shafiq 1441	Peshawar	64
108.	Muzafar Khan 357	Karak	65
109.	Shahbaz Khan 4358	Peshawar	66
110.	Allah Bakhash 20	D.I.Khan	66
111.	Gul Dad Khan 115	Bagh (A.K)	66
112.	Faraz Mahab	S.B Peshawar	67 (See Annex)

53.	Noor Zaman 73	Swat	37
54.	Anwar Khan 90 (PTC Hangu)	Abbottabad	37
55.	Namdar Khan 181	Charsadda	37
56.	Mohamad Riaz 438	Mansehra	38
57.	Shahbaz Ali 2546	Kotli (A.K)	39
58.	Dost Muhammad	Swat	40
59.	Faqir Khan 429	Nowshera	41
60.	Sher Akbar 778	Chitral	42
61.	Sher Mohammad Khan 381	D.I.Khan	43
62.	Mir Afzal 571	Islamabad	44
63.	S. Sarfaraz Hussain 1271	Rawla Kot (A.K)	44
64.	Amir Bahadar 763	Swat	45
65.	Mohammad perviz 1124	Swat	45
66.	Abdul Akbar 1041	Swat	45
67.	Mohammad Sajjad 94	Islamabad	45
68.	Rahim Ullah 29 (PTC Hangu)	Dir	45
69.	Gul Faraz 395	Peshawar	46
70.	Zakir Ullah 3077	Peshawar	47
71.	Khadim Hussain 382	D.I.Khan	47
72.	Naeem Khan 348	Malakand Levy	47
73.	Nasrat Ali 21543	Peshawar	48
74.	Shah Nawaz 210	Mirpur (A.K)	49
75.	Farhad Ali 186	Peshawar	49
76.	Husain 141	Skardo (N.A)	50
77.	Yosuaf Khan 4173	Malakand Levy	51
78.	S. Ayaz Khan 909	Bannu	52
79.	Mohammad Arif 2048	Mirpur (A.K)	53
80.	Muhabat Khan 1064	Swat	54
81.	Mukhtiaz Ahmad 446	Swabi	55
82.	Syed Kadeer Ali 94	Ghazar	55
83.	Talih Zar 21	Bunir	55
84.	Rustam 792	Bannu	55
85.	Khurshid 1211	Bannu	55
86.	Tariq Mehmood	Islamabad	55
87.	Nisar Mohamad	Charsadda	56
88.	Rashid Ahmad	Lahore/FIA	56
89.	Hafiz ur Rehman	Tank	57
90.	Ghulam Haider	Islamabad	57
91.	Bakhtiar 2924	Malakand Levy	58
92.	Mohammad Sher	Swat	59
93.	Nawab Khan 280	Bannu	59
94.	Mohammad Jaffar	Rawalpindi /FIA	59
95.	Said Muhammad	Bunir	60
96.	Mohammad Ayub 319	Malakand Levy	61
97.	Sher Alam 200	S.B Peshawar	62
98.	Abdul Aziz 6	Swabi	62
99.	Abdul Majeed 452	Islamabad	62
100.	Taj-ud-Din	Gilgit /FIA	62
101.	Sardar Khan 3673	Malakand Levy	62
102.	Muzafar Khan 3900	Malakand Levy	62
103.	Shireen 1732	Peshawar	62
104.	Hussain Shah	S.B Peshawar	63
105.	Izat Mohammad 714	Swat	63
106.	Mohammad Ayub.Khan	S.F Gilgit	63
107.	Mohammad Shafiq 1441	Peshawar	64
108.	Muzafar Khan 357	Karak	65
109.	Shahbaz Khan 4358	Peshawar	66
110.	Allah Badshah ...20	D.I.Khan	66
111.	Gul Dad Khan	Bagh (A.K)	66
112.	Fazal Wahab	S.B Peshawar	67
113.			
114.			
115.			

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116.	Hazrat Ali 776	Nowshera	68
117.	Mohammad Ashraf 405	Charsadda	68
118.	Shah Alam 995	Mardan	68
119.	Khalid Sher 436	Nowshera	69
120.	Masud Ali 316	Nowshera	69
121.	Murad Khan 322	Gilgit	69
122.	Haider Ali 3947	Malakand Levy	69
123.	Saif-ur-Rehman 4224	Malakand Levy	69
124.	Sadiq Shah 724	Swat	70
125.	Aziz-ur-Rehman 2612	Peshawar	71
126.	Giran Ullah 2131	Peshawar	71
127.	Rehmat Ullah 815	Nowshera	71
128.	Babar Khan	FIA Rawalpindi	71
129.	Jan Bahadur 881	Peshawar	72
130.	Fazal Haq 1195	Mardan	72
131.	Jamal Din	Gilgit	72
132.	Mir Sahib Khan	FIA Peshawar	72
133.	Zahoor-ud-Din 764	Chitral	73
134.	Tajbar Khan 2899	Peshawar	74
135.	Sher Rehman 140	Mardan	74
136.	Sher Wali 57	Chitral	74
137.	Gul Hamid 84	Ghazar (N.A)	74
138.	Nazir Ahmad 291	Diamar (N.A)	74
139.	Gohar Ali 618	Charsadda	75
140.	Gul Saeed 38	Bunir	75
141.	Zafar Ahmad 222	Chitral	75
142.	Sher Babu 508	Chitral	75
143.	Shirafat Khan 142	Haripur	75
144.	Atta Ullah 351	Skardo (N.A)	75
145.	Mohammad Afzal 547	Diamar (N.A)	75
146.	Fazal Karim 586	Swat	76
147.	Mohammad Abas 57	Ghazar (N.A)	76
148.	Rehman Saeed 3659	Malakand Levy	76
149.	Fati Mohammad 121	Bunir	77
150.	Mohd: Saif-ud-Din 812	Chitral	77
151.	Mohammad Ibrahim 54	Ghazar (N.A)	77
152.	Amir Ullah	FIA Peshawar	77
153.	Masud Ahmad 1946	Peshawar	77
154.	Ghulam Nabb: 3366	S.B Peshawar	77
155.	Sher Nawas 1968	Mardan	77
156.	Muhamad Shafa 568	Gilgit (N.A)	78
157.	Ghulam Hadi 368	Manchi	78
158.	Latif Ullah	F.I.A Peshawar	78
159.	Muhamad Wali 108	Bunir	79
160.	Mehmood Ahme: 1348	Rawala Kot (A.K)	79
161.	Muhamad Hayat 988	Bannu	80
162.	Sher Alam: 588	Gilgit (N.A)	80
163.	Gul Wali Shah 2106	Peshawar	81
164.	Liaqat Ali	Gil Git (N.A)	81
165.	Inham -Urehan 230	Diamer (N.A)	81
166.	Ashiq Hussain	F I A Fasil Abad	81
167.	Malang Jan 2401	Peshawar	82
168.	Muhamad Aslam	FIA Rawal Pindi	82
169.	Fazal Dad 72	Charsadda	83
170.	M. Gehan Gir	FIA Lahore	83
171.	Muhamad Jehangir 99	Diamer (NA)	83
172.	Hussain Muhamad 1356	Peshawar	84
173.	Ahmed Ali 2087	Peshawar	84
174.	Bakhat Zali 743	Charsadda	84
175.	Fareh Syed 1368	Mardan	85
176.	Amjed Hussain	FIA Lahore	85
177.	Aurangzeb 2012	Peshawar	85

116.	Hazrat Ali 776	Nowshera	68
117.	Mohammad Ashraf 405	Charsadda	68
118.	Shah Alam 995	Mardan	68
119.	Shah Alam 995	Nowshera	69
120.	Khalid Sher 436	Nowshera	69
121.	Masud Ail 716	Gilgit	69
122.	Murad Khan 322	Malakand Levy	69
123.	Haider Ali 3947	Malakand Levy	69
124.	Saif ur Rehman 4224	Swat	70
125.	Sadiq Shah 724	Peshawar	71
126.	Aziz ur Rehman 2612	Peshawar	71
127.	GiranShah 2131	Nowshera	71
128.	Remat Ullah 815	FIA Rawalpindi	71
129.	Babar Khan	Peshawar	72
130.	Jan Bahadur 881	Mardan	72
131.	Fazal Haq 1195	Gilgit	72
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134.	Zahoor ud Din 764	Peshawar	74
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136.	Sher Wali 57	Chitral	74
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138.	Nazir Ahmad 291	Diamar (N.A)	74
139.	Gohar Ali 84	Charsadda	75
140.	Gul Saeed 38	Bunir	75
141.	Zafar Ahmad 222	Chitral	75
142.	Sher Babu 508	Chitral	75
143.	Shirafat Khan 142	Haripur	75
144.	Atta Ullah 351	Skardo (N.A).	75
145.	Mohammad Afzal 547	Daimar (N.A).	75
146.	Fazal Karim 586	Swat	76
147.	Mohammad Abbas 57	Ghazar (N.A)	76
148.	Rehman Saeed 3659	Malakand Levy	76
149.	Fati Mohammad 121	Bunir	77
150.	Mohd. Saif ur Rehman 812	Chitral	77
151.	Mohammad Ibrahim 54	Ghazar (N.A)	77
152.	Amir Ullah	FIA Peshawar	77
153.	Masud Ahmad 1946	Peshawar	77
154.	Ghulam Nabi 3366	S.B Peshawar	77
155.	Sher Nawaz 1961	Mardan	77
156.	Uhammad Shafa 568	Gilgit (N.A)	78
157.	Ghulam Hadi 360	Lanchi	78
158.	Latif Ullah	FIA Peshawar	78
159.	Mohammad Wali 100	Bunir	79
160.	Mehmood Ahmad 1341	Rawala Kot (A.K)	79
161.	Muhammad Hayat 980	Bannu	80
162.	Sher Alam 56	Gilgit (N.A)	80
163.	Gul Wali Shah 2106	Peshawar	81
164.	Liaqat Ali	Gil Git (N.A)	81
165.	Inham - Ureman 230	Diamer (N.A)	81
166.	Ashiq Hussain	FIA Fasil Abad	81
167.	Malang Jan 2401	Peshawar	82
168.	Muhammad Aslam	FIA Rawalpindi	82
169.	Fazal Dad 72	Charsadda	83
170.	M. Gehangir	FIA Lahore	83
171.	Muhammad Jehangir 99	Diamer (NA)	83
172.	Hussain Muhammad 1356	Peshawar	84
173.	Ahmed Ail 2087	Peshawar	84
174.	Bakhat Zali 743	Charsadda	84
175.	Fareh Syed 1368	Mardan	85
176.	Amjed Hussain	FIA Lahore	85
177.	Aurranzeb 2042	Peshawar	86

20

(.. @4@...)

Sd/-

(ABDUL WADOOD SHAH)
Deputy Commandant,
Police Training College, Hangu.

NO. 3116-3196/C, Dated Hangu, the 4 /11/1993.

Copy of above submitted to the :-

1. The Inspector General of Police, NWFP, Peshawar.
2. The Inspector General of Police, Islamabad.
3. The Inspector General of Police, Muzafar Abad (Azad.K.)
4. The Dy: Inspector General of Police, Crimes NWFP, Peshawar (with 7 spare copies) for publication in Gazette Part-II.
5. The Dy: Inspector General of Police, Peshawar Range.
6. The Dy: Inspector General of Police, Mardan Range.
7. The Dy: Inspector General of Police, Malakand Range.
8. The Dy: Inspector General of Police, Hazara Range Abd:.
9. The Dy: Inspector General of Police, Kohat Range, Kohat
10. The Dy: Inspector General of Police, Banuu Range.
11. The Dy: Inspector General of Police, D.I.Khan Range.
12. The Dy: Inspector General of Police, Special Branch Pesh:.
13. The Sr: Superintendent of Police, Peshawar and Abbottabad.
14. The Sr: Superintendent of Police, Islamabad.
15. The Director FIA, Rawalpindi.
16. The Director FIA, Gilgit (N.A).
17. The Director FIA, Lahore.
18. The Director FIA, Faisal Abad.
19. The Political Agent, Malakand Agency.
20. The Supdt: of Police, Muzafar Abad (Azad Kashmir).
21. The Supdt: of Police, Kotli (A.K).
22. The Supdt: of Police, Rawlakot (A.K).
23. The Supdt: of Police, Mirpur (A.K).
24. The Supdt: of Police, Bagh (A.K).
25. The Supdt: of Police, Ganchi (N.A).
26. The Supdt: of Police, Diamar (N.A).
27. The Supdt: of Police, Ghazar (N.A).
28. The Supdt: of Police, Skardo (N.A).
29. The Supdt: of Police, Gilgit (N.A).
30. The Security Officer, Security Forces, Gilgit (N.A).
31. All Districts Superintendents of Police, in N.W.F.P.

(ABDUL WADOOD SHAH)
Deputy Commandant,
Police Training College, Hangu.

SP ریسٹورانٹ

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0332-9608888

21

Sd/
Abdu Wadood Shah
Deputy Commandant,
Police Training College Hangu

No. 3116-3186/C, dated Hangu, the 4/11/1993

Copy of above submitted to the:-

1. The Inspector General of Police, NWFP, Peshawar
2. The Inspector General of Police, Islamabad
3. The Inspector General of Police, Muzafar Abad (Azad K.)
4. The Deputy Inspector General of Police, Crime NWFP , Peshawar (with 7 spare Copies) for publication in Gazette Part-II
5. The Deputy Inspector General of Police, Peshawar Range.
6. The Deputy Inspector General of Police, Mardan Range.
7. The Deputy Inspector General of Police, Malakand Range.
8. The Deputy Inspector General of Police, Hazara Range Abad.
9. The Deputy Inspector General of Police, Kohat Range, Kohat
10. The Deputy Inspector General of Police, Bannu Range
11. The Deputy Inspector General of Police, D.I.Khan Range
12. The Deputy Inspector General of Police, Special Branch Peshawar
13. The Sr. Superintendent of Police Peshawar and Abbottabad
14. The Sr. Superintendent of Police Peshawar Islamabad
15. The Director FIA, Rawalpindi
16. The Director FIA, Gilgit (N.A)
17. The Director FIA, Lahore
18. The Director FIA, Faisal Abad.
19. The Political Agent, Malakand Agency
20. The Superintendent of Police, Muzafar Abad (Azad Kashmir)
21. The Superintendent of Police, Koti (A.K)
22. The Superintendent of Police, Rawlakot (A.K)
23. The Superintendent of Police, Mirpur (A.K)
24. The Superintendent of Police, Bagh (A.K)
25. The Superintendent of Police, Ganchi (N.A)
26. The Superintendent of Police, Diamar (N.A)
27. The Superintendent of Police, Ghazar (N.A)
28. The Superintendent of Police, Skardo (N.A)
29. The Superintendent of Police, Gilgit (N.A)
30. The Security Officer, Security Forces, Gilgit (N.A)
31. All Districts Superintendent of Police, In NWFP

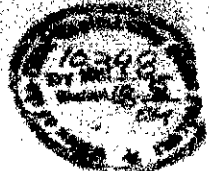
Sd/
Abdu Wadood Shah
Deputy Commandant,
Police Training College Hangu

22

Annexure "B"



POLICE TRAINING COLLEGE, HANGUR
Est. 1951



POLICE DEPARTMENT

PU HANGUR

FOR PUBLICATION IN SWEP POLICE GAZETTE, PART II ORDER BY THE COMMANDANT
POLICE TRAINING COLLEGE, HANGUR.

NOTIFICATION

Date: 10-7-1994

Subject: The following names of 31 Upper Cadets Course students
who have passed the examination held at PTC, Hangur for the term ending 30th March 1994 and have appeared in
the examination of P.S.N.C. held at PTC, Hangur are noted and are as follows:

Name	Rank	Division	Grade	Remarks
Abdullah M. S.	ANI	Kollegal	1	
Abdullah M. S.	SI	Hirapur	2	
Abdullah M. S.	SI	Shimoga	3	
Abdullah M. S.	SI	Belgaum	4	
Abdullah M. S.	ANI	D. Shikhar	5	✓
Abdullah M. S.	SI	Hirapur	6	
Abdullah M. S.	SI	Bellary	7	
Abdullah M. S.	SI	Channarayana	8	
Abdullah M. S.	SI	Kannur	9	
Abdullah M. S.	SI	Channarayana	10	
Abdullah M. S.	SI	Channarayana	11	
Abdullah M. S.	SI	Channarayana	12	
Abdullah M. S.	SI	Channarayana	13	
Abdullah M. S.	SI	Channarayana	14	
Abdullah M. S.	SI	Channarayana	15	
Abdullah M. S.	SI	Channarayana	16	
Abdullah M. S.	SI	Channarayana	17	
Abdullah M. S.	SI	Channarayana	18	
Abdullah M. S.	SI	Channarayana	19	
Abdullah M. S.	SI	Channarayana	20	
Abdullah M. S.	SI	Channarayana	21	
Abdullah M. S.	SI	Channarayana	22	
Abdullah M. S.	SI	Channarayana	23	
Abdullah M. S.	SI	Channarayana	24	
Abdullah M. S.	SI	Channarayana	25	
Abdullah M. S.	SI	Channarayana	26	
Abdullah M. S.	SI	Channarayana	27	
Abdullah M. S.	SI	Channarayana	28	
Abdullah M. S.	SI	Channarayana	29	
Abdullah M. S.	SI	Channarayana	30	
Abdullah M. S.	SI	Channarayana	31	

(Signature)
 Commandant
 Police Training College, Hangur

Copy of this notification is forwarded to the following for their information and necessary action:
 1. District Police Officer, D.V.P.P., Bangalore
 2. District Police Officer, W.P.P., Bangalore
 3. District Police Officer, P.P.P., Bangalore
 4. District Police Officer, P.P.P., Bangalore
 5. District Police Officer, P.P.P., Bangalore
 6. District Police Officer, P.P.P., Bangalore
 7. District Police Officer, P.P.P., Bangalore
 8. District Police Officer, P.P.P., Bangalore
 9. District Police Officer, P.P.P., Bangalore
 10. District Police Officer, P.P.P., Bangalore
 11. District Police Officer, P.P.P., Bangalore
 12. District Police Officer, P.P.P., Bangalore
 13. District Police Officer, P.P.P., Bangalore
 14. District Police Officer, P.P.P., Bangalore
 15. District Police Officer, P.P.P., Bangalore
 16. District Police Officer, P.P.P., Bangalore
 17. District Police Officer, P.P.P., Bangalore
 18. District Police Officer, P.P.P., Bangalore
 19. District Police Officer, P.P.P., Bangalore
 20. District Police Officer, P.P.P., Bangalore
 21. District Police Officer, P.P.P., Bangalore
 22. District Police Officer, P.P.P., Bangalore
 23. District Police Officer, P.P.P., Bangalore
 24. District Police Officer, P.P.P., Bangalore
 25. District Police Officer, P.P.P., Bangalore
 26. District Police Officer, P.P.P., Bangalore
 27. District Police Officer, P.P.P., Bangalore
 28. District Police Officer, P.P.P., Bangalore
 29. District Police Officer, P.P.P., Bangalore
 30. District Police Officer, P.P.P., Bangalore
 31. District Police Officer, P.P.P., Bangalore

(Signature)
 Commandant
 Police Training College, Hangur

(Handwritten notes and signatures)

23

Legible Copy

POLICE TRAINING COLLEGE HANGU

POLICE DEPARTMENT

PTC HANGU

**FOR PUBLICATION IN NWFP POLICE GAZETTE PART-II ORDER BY THE COMMANDANT
POLICE TRAINING COLLEGE HANGU**

NOTIFICATION

Dated 10-7-2004

Notification 3937/S/RESULT. The following students of Upper College Course appeared in the final examination held at PTC Hangu for the term ending 20th March, 2004 and have qualified to be declared PASSED. Their order of MERIT is noted against each name

S.No	Name	Rank	District	Merit	Remarks
1	Rahim Hussain	ASI	Kohistan	6	
2	Khursheed Ahmad	SI	Haripur	7	
3	Irshad Ahmad	SI	Nowshera	8	
4	Jamil Akhtar	SI AST	Battgram	9	
5	Noor Zamin Shah	SI	Peshawar	10	
6	Abdul Aziz	SI	Haripur	11	
7	Waheed Khan	SI	Batagram	12	
8	Sabir Hussain	SI	Charsadda	13	
9	Muhammad Aslam	ASI	Kohat	14	
10	M. Baig Khan	SI	Dir Lower	15	
11	Habib ur Rehman	SI	FRP Pesh	16	
12	Muhammad Azim	SI	Mansehra	16	
13	Rahmatullah	ASI	Peshawar	17	
14	Muhammad Ibrahim	ASI	Swat	18	
15	Muhammad Essa	SI	Gilgit	18	
16	Ali Murad Khan	ASI	Chitral	19	
17	Badshah Zada	ASI	Shangla	20	(Award grace marks in law)

Sd/-
Abdul Waheed Khan
Dy Commandant
For Commandant
Police Training College, Hangu

No.3938-58/S, dated Hangu, the

2004

Copy of above is submitted for information and necessary action to:

1. The Provincial Police Officer NWFP Peshawar & IGP Northern Area Gilgit
2. The Addl. IGP Investigation NWFP, for publication in Police Gazette Part II.
3. The Chief Capital City Police Peshawar
4. The DisG Region Mardan, Hazara, Malakand, Kohat
5. The DPO Districts Nowshera, Charsadda, Swat, Shangla, Dir/L, Chitral, Mansehra, Haripur, Battagram, Gilgit. Kohistan, Kohat

Sd/-
Abdul Waheed Khan
Dy Commandant
For Commandant
Police Training College, Hangu

24

Amn Exr CC



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

Telephone No. DD1-9210641 Fax No. DD1-9212992

No. 1338 /EC-1, dated Peshawar the 15 / 01 / 2022.

To: - The Asstt. Inspector General of Police.
Exlb: Khyber Pakhtunkhwa,
Peshawar.

Subject: APPLICATION OF DSP REHMATULLAH
Memo:

Please refer to your office letter No. 487/CPO/CPB, dated 21.12.2021 on the subject cited above.

It is submitted the applicant was promoted to the rank of Offg: ASI on 10.12.1995 as Special Case and he was confirmed in the rank of ASI, brought on promotion list "E" w.e from 21.06.2003. Hence his "D" colleagues were promoted to the rank of Offg: ASI on 02.08.2002 and confirmed in the rank of ASI, brought on promotion list "E" on 13.12.2007.

All his seniors who have been brought on list "D" are now retired as his "D" list colleagues. Moreover, Dost Muhammad was retired as Sub-Inspector on superannuation (pension) while Qeemat Gul was retired compulsory as an IHC on 16.08.2001.

Therefore, his name is brought under his immediate senior and above his immediate junior.

Furthermore, many of his juniors are promoted to the rank of DSsP including Yar Nawab Khan, whose name was brought on promotion list "D" on 10.10.1998 and Naseem Hayat whose name was brought on promotion list "D" on 20.09.2000. The applicant was brought on promotion list "D" on 01.10.1995

It is therefore, the opinion of AIG/Legal, CPO KPK, Peshawar have been sought which stated that " If an official does not affect the seniority of his batch-mates and is placed at his right place in the seniority list with his batch-mates, than it cannot be come within out of turn," please.

RECEIVED

(Waseem Ahmad Khalil) SSP/Coord
For CAPITAL CITY POLICE OFFICER,
PESHAWAR

D/C

Date: 17.01.2022 EC-1

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ATTESTED

ATTESTED

25

Annexure "a"



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

No. 378 /Legal, dated Peshawar, the 17 /12 /2022.

To: - The Senior Superintendent of Police,
Coordination, Capital City Police,
Peshawar.

Subject:- **APPLICATION OF DSP REHMAT ULLAH.**

Please refer to your office letter No. 6535/EC-1, dated 30.12.2021 on the subject cited above.

The Honorable Supreme Court of Pakistan, in series of its reported judgments, declared all out of turn promotions granted in shape of any kind of incentives, null and void, unconstitutional and un-Islamic.

The competent Authority has to examine each and every such case of out of turn promotion and decide it on merit in the light of judgment of the Court.

In this specific case of individual, reportedly his D list colleagues have been retired, even then, if he has not affected the seniority of his batch-mates and is placed at his right place in the seniority list with his batch-mates, then it cannot be come within out of turn. The Competent Authority may decide in the light of record and the directions of Apex court, Please.

ADN
ADTY LEGAL,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
17.12.2022

ATTESTED
[Signature]

Annexure E?

26



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

No. 6885 /Legal, dated Peshawar, the 13/08/2021.

To: - The Capital City Police Officer,
Peshawar.

Subject: GUIDANCE REGARDING CONFIRMATION IN THE RANK
OF SI.

Memo:

Please refer to your Office Letter No. 14430/EC-I, dated 12.08.2021 on the subject cited above.

Police Rules 13.18, probationary period of promotion, is clear on the subject. "All Police Officers promoted in rank shall be on probation for two years, provided that the appointing authority may, by a special order in each case, permit period of officiating service to count towards the period of probation. On conclusion of the probationary period, a report shall be rendered to authority empowered to confirm the promotion, who shall either confirm the officer or revert him. In no case shall the period of probation be extended beyond two years and the confirming authority must arrive at a definite decision within that period whether the officer shall be confirmed or reverted.

This is clear, the applicant was entitled to be confirmed or reverted after two years period, under this Rule.

[Handwritten signature]

[Handwritten signature]
AIG/LEGAL
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
13.08.2021

Scanned with CamScanner

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ATTESTED

27

Annexure F



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

No. CPO/CPM/262

Dated Peshawar 6 Sep, 2023.

Court Matter.

To The Capital City Police Officer,
Peshawar.

Subject: WRIT PETITION NO. 1393/2023 (DSP REHMAT ULLAH)

Memo: Please refer to your office letter No. 1485 dated 18.08.2023 on the subject cited above and to state that the seniority of Mr. Rehmat Ullah DSP was fixed with DSP Muslim Khan. However, as per record he was enlisted as Selection Grade Constable on 16.10.1991 under Police Rules 12.10A. Later on he qualified Lower College Course vide No. 3116-3190 dated 04.11.1993 from district Nowshera. Moreover, he was promoted to list "D" on 01.01.1995 and was further promoted as Offg. ASI vide CCP Peshawar Notification No. 15436/EC, dated 10.12.1995 in a special case. On the contrary, his colleagues were promoted as an Offg. ASI on 02.08.2002. After abolishing all out of turn promotions his name will be placed at S.No. 203 as Inspector below the name of Lower Course Enrolment Inspector Zakir Ullah No. P/308 of the revised seniority issued on 06.12.2022.

His promotion as Officiating ASI through CCP Peshawar Notification No. 15436/EC, dated 10.12.1995 in Special Case may also be examined as to what constituted Special Case Promotion.

It is, therefore, once again requested that his case may please be reviewed personally and details may be shared with CPO Peshawar for issuance of Speaking Order under the signature of CPO Peshawar.

The matter may be treated as most urgent.

Deputy Inspector General of Police,
Central Police Office,
Peshawar.

Endst: No. and dated even

Copy of above is forwarded for information to the:-

1. PSO to Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
2. AIG/Legal CPO Peshawar.
3. PA to DCG/1(Qrs), Khyber Pakhtunkhwa, Peshawar.
4. PA to AIG/Establishment, Khyber Pakhtunkhwa, Peshawar.

ATTESTED

Attested

(22)

BETTER COPY

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

No. CPO/CPB/262

Dated

Peshawar the 6 Sep, 2023

Court Matter

To:- The Capital City Police Officer,
Peshawar.

Subject: **WRIT PETITION NO.1393/2023 (DSP REHMAT ULLAH)**

Memo:- Please refer to your office letter No. 14483 dated 18.08.2023 on the subject cited above and to state that the seniority of Mr. Rehmat Ullah DSP was fixed with DSP Muslim Khan. However, as per record he was enlisted as Selection Grade Constable on 16.10.1991 under Police Rules 12.10A. Later on he qualified Lower College Course vide No. 3116-3190 dated 04.11.1993 from district Nowshera. Moreover, he was promoted to list "D" on 01.04.1995 and was further promoted as Offg. ASI vide CCP Peshawar Notification No. 15436/EC dated 10.12.1995 in a special case. On the contrary his colleagues were promoted as an Offg. ASI on 02.08.2002. After abolishing all out of turn promotions his name will be placed at S.No. 203 as Inspector below the name of Lower Course Subordinate Inspector Zakir Ullah No.P/308 of the revised seniority issued on 06.12.2022.

His promotion as officiating ASI through CCP Peshawar Notification No. 15436/EC dated 10.12.1995 in Special Case may also be examined as to what constituted Special Case Promotion.

It is, therefore, once again requested that his case may please be reviewed personally and details may be shared with CPO Peshawar for issuance of Speaking Order under the signature of CCPO Peshawar.


The matter may be treated as most urgent.


Sd/-

(RIZWAN MANZOOR) PSP
Deputy Inspector General of Police,
HQrs Khyber Pakhtunkhwa,
Peshawar

Endst: No. and dated even

- Copy of above is forwarded for information to the:-
1. PSO to Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
 2. AIG/Legal CPO Peshawar.
 3. PE to DIG/HQrs, Khyber Pakhtunkhwa, Peshawar.
 4. PA to AIG/Establishment, Khyber Pakhtunkhwa, Peshawar.

Attested


ATTACHED




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OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No. 14463 Telephone No. 991-9210641 Fax No. 991-9212597
EC-L dated Peshawar the 18 08 2023.

To: The Deputy Inspector General of Police,
HQs, Khyber Pakhtunkhwa, Peshawar.

Subject: WRIT PETITION NO. 1393/2023 (DSP REHMAT ULLAH)

Memo:

Kindly refer to your office memo: No. 241/CPO/CPB dated 12.07.2023 on the subject cited above.

1. It is submitted that the record of this office regarding out of turn promotion of Inspector Rehmat Ullah was thoroughly examined with the assistance of SSP Coordinator, SP HQs and Establishment Branch. As per record, Inspector Rehmat Ullah was enlisted as Constable on 29.03.1992 who completed his Lower Course in 1993. He completed Intermediate Course on 01.10.1995 and his name was placed with his Intermediate Colleagues below the name of Munwar Khan No. 317/P (dead) and above the name of Muhammad Nawaz 334/7 (retired on 12.07.2017)

2. Inspector Rehmat Ullah was promoted as Offg: ASI on 11.12.1995 in a Special Case and further promoted as Offg: SI on 31.05.2004 whereas his Intermediate Colleagues were promoted as Offg: ASI on 02.08.2002 and further promoted as Offg: SI on 26.01.2008.

3. All colleagues of Inspector Rehmat Ullah have either been retired or dead. After withdrawal of his out of turn promotion, his date of ASI promotion i.e. 11.12.1995 will be read as 02.08.2002 and his date of confirmation as 02.08.2004 in the light of Police Rules 13-18.

4. Name of Inspector Rehmat Ullah may be placed above his junior colleague DSP Muslim Khan, details tabulated below:

Name	Date of Enlistment	Intermediates College Course	Date of promotion as ASI	Date of confirmation as ASI E list
Rehmat Ullah	29.03.1992	01.10.1995	11.12.1995 special case	08.01.2003
			02.08.2002 colleagues	13.12.2007 colleagues
Muslim Khan	30.06.1988	01.10.1996	07.05.2003	05.04.2008

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SSP COORDINATION
For CAPITAL CITY POLICE OFFICER,
PESHAWAR.

05/2023 FC-

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**OFFICE OF THE
CAPITAL CITY POLICE OFFICER
PESHAWAR**

Telephone No. 091-9210641, Fax No. 091-9212597

No.14463/EC-1, dated Peshawar the 18/08/2023

To:- The Deputy: Inspector General of Police,
HQrs, Khyber Pakhtunkhwa, Peshawar.

Subject: **WRIT PETITION NO.1393/2023 (DSP REHMAT ULLAH)**

Memo:

Kindly refer to your office memo: No. 241/CPO/CPB dated 12.07.2023 on the subject cited above.

1. It is submitted that the record of this office regarding out of turn promotion of Inspector Rehmat Ullah was thoroughly examined with the assistance of SSP Coordination, SP HQs and Establishment Branch. As per record, Inspector Rehmat Ullah was enlisted as Constable on 29.03.1992 who completed his Lower Course in 1993. He completed Intermediate Course on 01.10.1995 and his name was placed with his Intermediate Colleagues below the name of Munawar Khan No: 317/P (dead) and above the name of Muhammad Nawaz 334/P (retired on 12.07.2017)
2. Inspector Rehmat Ullah was promoted as Offg: ASI on 11.12.1995 in a Special Case and further promoted as Offg: SI on 31.05.2004 whereas his Intermediate Colleagues were promoted as Offg: ASI on 02.08.2002 and further promoted as Offg: SI on 26.01.2008.
3. All colleagues of Inspector Rehmat Ullah have either been retired or dead. After withdrawal of his out of turn promotion, his date of ASI promotion i.e. 11.12.1995 will be read as 02.08.2002 and his date of confirmation as 02.08.2004 in the light of Police Rules 13-18.
4. Name of Inspector Rehmat Ullah may be placed above his junior colleague DSP Muslim Khan, details tabulated below:

Name	Date of Enlistment	Intermediates College Course	Date of promotion as ASI	Date of confirmation as ASI - E list
Rehmat Ullah	29.03.1992	01.10.1995	11.12.1995 special case	08.01.2003
			02.08.2002 colleagues	13.12.2007 colleagues
Muslim Khan	30.06.1988	01.10.1996	07.05.2003	05.04.2008

ATTESTED

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Attested
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Sd/-

SSP COORDINATION
For CAPITAL CITY POLICE OFFICERS,
PESHAWAR



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Annexure 1/17

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT**

Dated Peshawar the December 20, 2023

NOTIFICATION

No. SO(Police-II)/HD/8-10/DSB&DPC/2023. On the recommendations of the Departmental Selection Board in its meeting held on 17.10.2023 and subsequent approval of the Chief Minister Khyber Pakhtunkhwa being competent authority, the following Deputy Superintendents of Police (BS-17) are hereby promoted to the rank of Superintendents of Police (BS-18), on regular basis, with immediate effect:

S. No.	Name of Officers	S.No	Name o Officers
1.	Mr. Waqar Ahmad DSP (BS-17)	11.	Mr. Ali Gohar DSP (BS-17)
2.	Mr. Janas Khan DSP (BS-17)	12.	Mr. Waqar Ahmad DSP (BS-17)
3.	Mr. Asif Gohar DSP (BS-17)	13.	Mr. Abdus Salam Khalid DSP (BS-17)
4.	Mr. Arshad Mehmood DSP (BS-17)	14.	Mr. Arshad Khan DSP (BS-17)
5.	Mr. Saleem Aman Ullah DSP (BS-17)	15.	Mr. Sajjad Hussain DSP (BS-17)
6.	Mr. Niaz Gul DSP (BS-17)	16.	Mr. Muhammad Tahir Shah DSP (BS-17)
7.	Mr. Tauheed Khan DSP (BS-17)	17.	Mr. Safdar Khan DSP (BS-17)
8.	Mr. Rahim Hussain DSP (BS-17)	18.	Mr. Khan Khel DSP (BS-17)
9.	Mr. Amjad Hussain DSP (BS-17)	19.	Ms. Aneela Naz DSP (BS-17)
10.	Mr. Murad Ali DSP (BS-17)		

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

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3. The promotion of officers at S. No. 1,2,3,4,5,8,9 and 10 shall be subject to the outcome of CPLAs initiated by Police Department in the Supreme Court of Pakistan against the judgement of Peshawar High Court dated 29.08.2023 in Writ Petition No. 4507/2023

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3 The promotion of officers at S. No. 1,2,3,4,5,8,9 and 10 shall be subject to the outcome of CPLAs initiated by Police Department in the Supreme Court of Pakistan against the judgement of Peshawar High Court dated 29.08.2023 in Writ Petition No. 1587-P/2022.

4. Posting/Transfer order will be issued by Provincial Police Officer, Khyber Pakhtunkhwa.

**CHIEF SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA**

Endst. No. & Date Even

Copy of above is forwarded to the:

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Provincial Police Officer, Khyber Pakhtunkhwa.
4. Accountant General, Khyber Pakhtunkhwa.
5. Capital City Police Officer, Khyber Pakhtunkhwa.
6. All Regional Police Officers in Khyber Pakhtunkhwa.
7. Director, Information, Khyber Pakhtunkhwa.
8. PSO to Chief Secretary, Khyber Pakhtunkhwa.
9. PS to Chief Secretary, Khyber Pakhtunkhwa.
10. PS to Additional Chief Secretary (Home), Khyber Pakhtunkhwa.
11. PS to Secretary Establishment, Khyber Pakhtunkhwa.
12. PS to Secretary (Admin), Khyber Pakhtunkhwa.
13. Officers concerned.
14. Manager, Govt. Printing Press Peshawar.


SECTION OFFICER (POLICE-II)
Home & Tribal Affairs Department.

28/12/23



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA

Dated Peshawar the 03/01/2024

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Annexure "I"

NOTIFICATION

No. CPO/E-I/Transfer/Posting/ 83, In exercise of the powers conferred upon the Provincial Police Officer, Khyber Pakhtunkhwa under sub-section (4) of Section 17 of the Khyber Pakhtunkhwa Police Act, 2017, the following transfers/postings are hereby ordered in the public interest, with immediate effect: -

S#	Name & Rank	From	To
1.	Mr. Muhammad Suleman PSP (BS-18)	SP Investigation Mardan	DPO Kohistan Lower
2.	Muhammad Jamil Akhtar PSP (BS-18)	DPO Kohistan Lower	SP CTD Hazara-II
3.	Mr. Zia Hassan PSP (BS-18)	Look after charge of the office of Operations Branch CPO Election Cell	Operations Branch CPO Election Cell
4.	Mr. Falak Niaz Prov: SP (BS-18)	Awaiting posting at CPO Peshawar.	SP/Director Police School of PDRM Mardan
5.	Mr. Asif Gohar Prov: SP (BS-18)	SP Investigation Haripur	DPO Battagram
6.	Mr. Amjad Hussain Prov: SP (BS-18)	SP CTD Hazara-II	SP Investigation Haripur
7.	Mr. Asad Zubair DSP (BS-17)	Acting SP Special Branch Khyber Pakhtunkhwa	Acting SP Investigation Orakzal in his own pay & scale on vacant post.
8.	Mr. Rahmat Ullah DSP (BS-17)	Awaiting posting at CPO, Peshawar	DSP Security CCP, Peshawar

This is issued with the approval of Election Commission of Pakistan.

Sd/-
(AKHTAR HAYAT KHAN) PSP
PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA

& date even.

forwarded to the: -

Accountant General Khyber Pakhtunkhwa Peshawar.

Add: Inspector General of Police, Investigation, Operations, Special Branch, HQrs., Train & CTD Khyber Pakhtunkhwa.

Deputy Inspector General of Police HQrs: Khyber Pakhtunkhwa.

Regional Police Officer, Kohat, Hazara, Mardan.

Director (Elections-II), Election Commission of Pakistan, Islamabad w/r to his office let F.10(1)/2023-Elec-II dated 05.01.2024.

PSO to IGP Khyber Pakhtunkhwa.

Officers concerned.

District Account Officers, concerned.

SO (E-3/Police) Govt: of Pakistan Estab: Division Islamabad.

Registrar CPO Peshawar.

Supdt: Secret CPO Peshawar.

Accountant CPO, Peshawar.

U.O.P File.

(RIZWAN MANZOOR) PSP
DIG/Headquarters
For Inspector General of Police
Khyber Pakhtunkhwa