27.01.2021

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General, for the respondents is present.

By virtue of order sheet dated 08.07.2020 preadmission notice was ordered to be issued to the learned Additional Advocate General for next date of hearing i.e 09.09.2020. However, the perusal of record reveals that no notice in this regard has been issued, the learned Additional Advocate General, is present before the Tribunal which though sufficient, however, for fulfillment of the requisite requirements a notice has to be issued for 29.03.2021 to learned Additional Advocate General. File to come up for further proceedings before S.B.

> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)

29.03.2021

Nemo for appellant.

Case was called time and again but neither the appellant nor his counsel turned up.

In view of above, instant service appeal is hereby dismissed in default for non-prosecution. No order as to costs. File be consigned to the record room.

Announced. 29.03.2021

(Rozina/ ehman) Member (J)

#### Appeal No. 1402/2019

09.09.2020

Counsel for appellant and Addl. AG alongwith Wajid H.C for the respondents present.

Learned counsel for the appellant appeared on the first call when no one was available on behalf of respondents. Thereafter, the matter was kept in wait for learned counsel who has not turned up till now (12.40 PM). The hearing in the matter is, therefore, adjourned to 11.11.2020 before S.B.

Chairma

#### 11.11.2020

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is present.

Since the Members of the High Court as well as of the District Bar Associations, Peshawar, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 27.01.2021 on which date to come up for further proceedings before S.B.

(Muhammad Jamal Khan) Member (Judicial)

25.02.2020

13.04.2020

Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up for preliminary hearing on 13.04.2020 before S.B. Appellant be put to notice for the date fixed.

Member

Reader

12.5

Due to public holiday on account of COVID-19, the case is adjourned to 08.07.2020 for the same. To come up for the same as before S.B.

08.07.2020

Counsel for appellant present.

Record shows that the instant service appeal has been filed against the impugned notification No.12882/EC-1 dated 07.06.2015. Let pre-admission notice be served upon learned AAG for 09.09.2020 before S.B.

Member (J)

# Form- A FORM OF ORDER SHEET

Court of 1402/2019 Case No.-S.No. Date of order Order or other proceedings with signature of judge proceedings 2 1 3 The appeal of Mr. Muhammad Nawaz Khan presented today by 23/10/2019 1-Mr. Yousaf Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR 23/10/19 This case is entrusted to S. Bench for preliminary hearing to be 24/10/19. 2put up there on 09/12/19 CHAIRMAN 09.12.2019 Nemo for appellant. Notices be issued to appellant/counsel for preliminary hearing before S.B on 14.01.2020. Chairma R-1 14.01.2020 Junior to counsel for the appellant present. Requests for adjournment due to general strike of the Bar. Adjourned to 25.02.2020 before S.B. Chairman

#### <u>BEFORE THE KHYBER PAKHTUNKHWA SERVICES</u> <u>TRIBUNAL, PESHAWAR</u>

Service Appeal No. 1402 /2019

Muhammad Nawaz Khan..... APPELLANT

#### VERSUS

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Appellant

Through

**YOUSAF KHAN** Advocate, High Court, Peshawar Cell: 0345-9028307

Dated: 22.10.2019

n Bàtà\Yousal Khan Adv\Mi

Part The American (PA)

#### BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

1

Khyber Pakhtukhwa Service Tribunal Diary No. 148

Service Appeal No. 1402 /2019

Muhammad Nawaz Khan S/o Muhammad Bakhtiar Khan Presently posted at CTD (Intelligence), Mardan.... APPELLANT

#### VERSUS

- 1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2. Capital City Police Officer, Peshawar.

Filedto-day Registrar 23/10/19

0.\Faizan OATA\Yousal Khan Ady\Muhammad Nawaz Khan Service Anneal 2019.doc

SERVICE APPEAL AGAINST THE IMPUGNED NOTIFICATION NO.12882/ EC-1, DATED <u>07.06.2015</u>, WHEREBY THE RESPONDENTS ARE FAILED TO ACT UPON THE SAID NOTIFICATION AND ALSO FAILED TO REPLY THE APPLICATION FILED BY THE APPELLANT.

#### Prayer in Appeal:

On acceptance of this appeal, the respondents be directed to act upon the notification No.12882/EC-1, dated forthwith 07.06.2015 and the appellant's promotion order be revised w.e.f. 27.09.2011 instead of 16.04.2014 and the respondents may further be directed to place the appellant between Akhtar Gul and Fazal Karim in the seniority list of 2011.

Any other relief, which not specifically asked for and this Honourable Tribunal may think fit and appropriate may kindly be granted.

## **Respectfully Sheweth:**

Precisely stating the facts of the case out of which the present appeal arise are as under:-

That in the earlier round of litigation, the appellant filed Service Appeal No.40/2012 against the impugned order of CCPO, Peshawar dated 19.03.2011, vide which the competent authority on the recommendation of DPC, pleased the appellant as Sub-Inspector on acting charge basis and further that his appeal was not entertained by the appellate authority. The appeal of the appellant was heard and decided vide order/ judgment dated 01.06.2015 by this Honourable Tribunal vide which the case was remitte4d back to the appellate authority with the direction to treat the same as Departmental Appeal of the appellant and to be decided within a period of one month through speaking order as required by law. (COPY OF THE ORDER DATED 01.06.2015 IS ATTACHED).

2. That after remanding the case as appeal to competent authority through impugned notification No.1282/EC-1, dated 07.06.2015 revised the promotion order of the appellant from 27.11.2011 instead of 16.04.2014, but till date the competent authority is failed to comply with the said notification, hence the present appeal, inter alia, on the following grounds;

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1.

#### **GROUNDS**:

zan DAJANYousal Khan AdvNMubammad Nawaz Khan Servicu Anneal 2019

A. That non-compliance of the aforesaid notification dated 07.06.2015 by the respondents is illegal, without lawful authority, without jurisdiction, malafide and void abinitio.

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- B. That the act of the respondents is contumacious, they are intentionally avoiding to obey the notification dated 07.06.2015.
- C. That every government official, public functionaries and civilians are under legal obligation to honour the order/judgment of a Court of competent jurisdiction, the respondents by not complying with the same, have not performed their duty in accordance with law.
- D. That non-compliance of the order of the Honourable Tribunal, speaks of malafide on the part of respondents and to lower the position of the judiciary in the eye of public at large.

It is, therefore, prayed that on acceptance of this appeal, the respondents be directed to act upon the notification No.12882/EC-1, dated 07.06.2015 forthwith and the appellant's promotion order be revised w.e.f.

27.09.2011 instead of 16.04.2014 and the respondents may further be directed to place the appellant between Akhtar Gul and Fazal Karim in the seniority list of 2011.

Any other relief, which not specifically asked for and this Honourable Tribunal may think fit and appropriate may kindly be granted.

Appellant

Through

**YOUSAF KHAN** Advocate, High Court, Peshawar

usth

Dated: 22.10.2019

(I-\Eaizan (IAIA\Yousal Khan Adv\Xuhammad Haway Khan Se

#### <u>BEFORE THE KHYBER PAKHTUNKHWA SERVICES</u> <u>TRIBUNAL, PESHAWAR</u>

Service Appeal No.\_\_\_\_/2019

Muhammad Nawaz Khan..... APPELLANT

#### VERSUS

#### <u>AFFIDAVIT</u>

I, Muhammad Nawaz Khan S/o Muhammad Bakhtiar Khan, presently posted at CTD (Intelligence), Mardan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



n BATA\Ymusaf Khan Arly\Hubammad Kawaz Khan Servici

DEPONENT

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#### <u>BEFORE THE KHYBER PAKHTUNKHWA SERVICES</u> <u>TRIBUNAL, PESHAWAR</u>

Service Appeal No.\_\_\_\_\_/2019

Muhammad Nawaz Khan..... APPELLANT

VERSUS

#### ADDRESSES OF THE PARTIES

#### <u>APPELLANT:</u>

Muhammad Nawaz Khan S/o Muhammad Bakhtiar Khan Presently posted at CTD (Intelligence), Mardan.

#### <u>RESPONDENTS:</u>

- 1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2. Capital City Police Officer, Peshawar.
- 3. Departmental Promotion Committee, through its Chairman, CPO Office, Peshawar.

Appellant

Through

**YOUSAF KHAN** Advocate, High Court, Peshawar

Dated: 22.10.2019



Date of

01.06.2015

7.

order/ proccedings 2

Sr. No.

1.

Order or other proceedings with signature of tradge

#### KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, <u>peshawar</u>.

Service Appeal No. 40/2012,

Muhammad Nawaz Khan Versus Provincial Police Officer <u>JUDGMENT</u>

<u>PIR BAKHSH SHAH, MEMBER.</u> Appellant with counsel (Mr. Shakeel Ahmad, Advocate) and Government Pleader (Mr. Muhammad Jan) for the respondents present.

2. Appellant Muhammad Nawaz is aggrieved with the impugned order of Capital City Police Officer, Peshawar dated 19.3.2011 vide which the competent authority on the recommendations of DPC placed the respondents as Sub Inspectors on acting charge basis, and further that his appeal was also not entertained by the appellate authority vide his order dated 28.02.2011, hence this appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 with the following prayer:-

"It is, therefore, prayed that on acceptance of this appeal, the impugned order No. 4747-59/EC-1 dated 19.03.2011 whereby the respondents No. 5 to 17 were promoted as S.I on acting charge basis and thereafter dismissal of his departmental appeal vide order dated 28.12.2011 is illegal, without lawful authority, without jurisdiction, malafide, void ab-initio, of no legal effect and ineffective upon the rights of the appellant and the respondents be directed to promote the appellant as S.I from the date when his juniors were promoted with all back benefits."

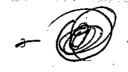
3. While arguing the appeal, it was submitted by the learned counsel for the appellant that though private

respondents No. 5 to 17 were junior to the appellant but they were promoted in preference to the appellant without any reason. He also submitted that name of the appellant was required to have been placed in the seniority list according to the merit list of intermediate result declared by the PTC Hangu but this principle of seniority was ignored and respondents No. 5 to 17 were promoted contrary to the said rules.

4. In rebuttal, learned Government Pleader for the respondents argued that acting charge basis promotion is no promotion in the eyes of law and further that the appellant has not challenged order of regular promotion of the respondents therefore, this appeal was not maintainable on these grounds. It was further argued that no relief can be given to the appellant on the basis of this appeal. The learned Government Pleader also pointed out that in fact the appellant was transferred from district Nowshera to Peshawar in 2008, therefore, he was given his due place in the seniority list of district Peshawar Police. He submitted that the appeal may be dismissed.

5. We have heard arguments of the learned counsel for the parties and perused the record.

6. The record on perusal would show that impugned order dated 19.3.2011 was passed by the CCPO Peshawar whereas departmental appeal of the appellant has also been disposed of by the same authority vide his order dated 28.12.2011 in the following terms:



#### "The case of ASI Muhammad Nawaz Khan was examined and filed.

Evidently no reason whatsoever has been given in the above order by the authority on the basis of which departmental appeal of the appellant was rejected. Under Section 24-A of the General Clauses Act, the authority was required to have given reason for his order and thus on the parameters of the said section of law, the said order is faulty and requires indulgence of this Tribunal. Hence, order dated 28.12.2011 of the CCPO Peshawar on appeal of the appellant is set aside. The case is remitted to the appellate authority to be treated as departmental appeal of the appellant and to be decided within a period of one month through a speaking order as required by the law. The appeal is disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record room. Appillet att

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POLICE DEPTT: EOR PUBLICATION IN THE KHYBER PAKHTUNKHWA, POLICE GAZETTE PART-II. ORDERS BY THE CAPITAL CITY POLICE OFFICER KHYBER PAKHTUNKHWA, PESHAWAR. <u>PESHAWAR.</u> NOTIFICATION. 12882 Dated 7 /2015. No. /EC-I, REVISED PROMOTION TO THE RANK OF OFFG: SI:- As approved by the competent authority, the Promotion order of Offg: SI Muhammad Nawaz No. 1114/P of Capital City Police, Peshawar presently on deputation to Nowshera District, issued vide this office Notification No.5821-41/EC-I, dated 16.04.2014 is hereby revised w.e.from 27.09.2011 instead of 16.04.2014. However, he will not claim any financial back benefits. FOR CAPITAL OILY POLICE OFFICER, PESHAWAR. EC-I, Copy of above is forwarded for information and necessary action to the:-Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar w/r to 1. office memo No.3172/Legal, dated 25.06.2015. Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar, alongwith two spare copies for 2. Publication, KPK,Gazette Notification part-II. Deputy Inspector General of Police, Mardan Region Mardan. з. 4. District Police Officer, Nowshera w/r to his office memo No.8670/EC, dated 18.06.2015. 5. DSP/Legal Peshawar w/r to his letter NO.922/LB, dated 6. AS, CCP, Peshawar.

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

NOTIFICATION.

Dated 8/1/ /2015.

CCP, PESHAWAR.

No. <u>452</u> /EC-I, **REVISED SENIORITY OF** CONFIRMATION IN THE RANK OF ASI **&** PROMOTION TO LIST "E". As approved by the competent authority and in the light of W/Provincial Police Officer, KPK, Peshawar letter No. 18564-65/E-II, dated 23-07-2009, The seniority of the following Confirmed/"E" list ASIs/Offg: SIs are hereby revised and they are given confirmation and brought their names on promotion to list "E" with their "D" list colleagues as per PTC Merit List as noted against each:<sup>1</sup>

S#	Rank, Name & No	Present Posting	Date of . confirmation	Name placed between their colleagues
1.	Imdad Ullah No. 1113/P	Spi: Branch	and list "E" 27-9-2011	SIs M.Iqbal No. 924/P and Umer
2.	Muhammad Nawaz No.1114/P	Nowshera	27-9-2011	Sher No. 925/P SIs Akhtar Gul No. 931/P and Fazal Karim No. 932/P
3.	Ghulam Sarwar No. 1115/P	Nowshera	27-9-2011	SIs Akhtar Gul No. 932/P Fazal Karim No. 932/P
· 1,	Shad Muhammad No. 1116/P	СТО КРК	27-9-2011	Sis Khiai Bad Shah No. 933/P and Hassan ul Wahab No. 934/P
5.	Irshad Ali No. 1314/P	CCP/Nowshera	27-9-2011	Sis Khial Bad Shah No. 933/P and Hassan ul Wahab No. 934/P
6,	Sardar Ahmad No.1117/P	СТО КРК	27-9-2011	Sis Sher Azam No.939/P and M.Ghent No. 940/P
7.	S.M Hanif No. 1118/P	Lien transfer to Mardan	27-9-2011	SIs Sher Azam No.939/P and M.Ghani No. 940/P
8.	Muhammad Ayaz No.1119/P	СТО КРК	27•9-2011	SIs Zakir Ullah No. 941/P and M. Tahir No. 942/P
9.	Muhammad Hayat No. 1120/P	Traffic	27-9-2011	SIs M. Tahir No. 942/P and Sardar Ali No. 943/P
10.	Said Qamar No. 1121/P	Lien transfer to Mardan	27-9-2011	SIs Anwar Shah No. 946/P and Safdar Khan No. 947/P
11.	Muhammad Ismail No. 1122/P	Nowshera	27-9-2011	SIs Safdar Khan No. 947/P and Inam Ullah No. 948/P
12.	• •	Spl: Brach	27-9-2011	SIs Safdar Khan No. 947/P and Inam Ullah No. 948/P
13.	· · ·	CCP, Peshawar		SIs Dost Muhammad No.949/P and Niaz Mohammad No. 950/P
14.		NSR/Dismissed	27-9-2011	SIs Dost Muhammad No.949/P and Niaz Mohammad No. 950/P
15.		Spl: Branch 🕓	27-9-2011	SIs Dost Muhammad No.949/P and Niaz Mohammad No. 950/P
16	· · · · · · · · · · · · · · · · · · ·	Traffic	27-%-2011	SIs Roman Shah No. 951/P and Khan Gui No. 952/P
17.	Hassan Khan No. 1128/P	Charsadda	27-09-2311	Already given seniority vide this order endst: No. 12635-38/EC-I, dated 23-09-2014
18	. Bahar Ahmad No. 1129/P	Charsadda	27-9-2011	SIs Zia Ullah No. 974/P and Raza Mohd: No.975/P
19		СТО КРА	27-9-2.11	SIs Zia Ullah No. 974/P and Raza Mohd: Xo 975/P
20		CTC XPF	27-9-2011	SIs ian Mohd: Nc. 979/P and Inayat Ullah ric.981/P
21		Traffic	27-9-1.011	SIs Razi Khan No. 98-7 And M. Akram No. 9857
22		Traffic	27-9-2 111	SIs Farhad Hussain No.987/P and Sawal Fagir No. 988/P
23	. Zardad All No. 1134/P	CCP, Peshawar		SIs Sana Ullah No. 1/P and Yousef Khan No. 989/P
24		CCP, Peshawar		SIs Sana Ullah No. 1/P and Yousaf Khan No. 989/P
25	. Yahya Shah No. 1136/P	СТО КРК	27-9-2011	SIs Noor ul Hadi No. 994/P and Fagir Hussain No. 995/P
26	,	Charsadda	27-9-2011	SIs Dilfaraz No. 996/P and Zafar All No. 997/P
27	Jafar Shah No. 10/P	СТО КРК	27-9-2011	SIs Zafar All No. 997/P and Muhammad Ibrahim No.998/P
28	. Bahader Sher No. 1139/P	CPC Peshawar	27-9-2011	SIs Zəfar Ali No. 997/P and Muhammad Ibrahim No.998/P
29	. Jamshid Khan No. 11/P	CCP, Peshawai	27-9-2011	
30	. Malik Taj No. 1141/P	Inv: CCP, Pest	27-9-2011	SIs M.Ibrahim No. 998/P and Tilawat Khan No. 999/P
31	. Safdar All No. 1142/P	Traffic	27-9-2011	SIs Faheem Ullah No. 1000/P.and Zahir Shah No. 1001/P

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٦	.32.	Murad Ali No. 1144/P	Charsado	27-9-2011	SIs Faheem Ullah No. 1000/P and
· .[-	33.	Umer Khan No. 1145/P	Traffic/SB	27-9-2011	Zahir Shah No. 1001/P SIs Faheem Ullah No. 1000/P and
┢	34.	Itbar Shah No. 1146/P		27-9-2011	Zahir Shah No. 1001/P SIs Faheem Ullah No. 1000/P and
┢	35.	M. Ishfaq No. 1147/P	CTD KPK	27-9-2011	Zahir Shah No. 1001/P SIs Zahir Shah No. 1001/P and
┣-	36.	Hayat Ullah No. 1148/P	Traffic	27-9-2011	Khalil ur Rehman No. 1002/P SIs Zahir Shah No. 1001/P and
ŀ	37.	M. Riaz No. 1149/P	CCP, Peshawar	27-9-2011	Khalil ur Rehman No. 1002/P Sls Zahir Shah No. 1001/P and
-	38.	Ghulam Ali No.1150/P	Spl: Branch	27-9-2011	Khalil ur Rehman No. 1002/P SIs Zahir Shah No. 1001/P and
┢	39.	Liaqat Ali No. 1151/P	CCP, Peshawar	27-9-2011	Khalil ur Rehman No. 1002/P SIs Qeemat Gul No. 1006/P and
-	40.	Gui Shed Ali No. 1152/P	Charsadda	27-9-2011	Fazle Khalig No. 1007/P SIs Fazle Khalig No. 1007/P and
-	41.	Fakhre Alam No. 1153/P	Traffic	27-9-2011	Wali Zada No. 1008/P SIs Muhammad Israr No. 1011/P
┢	42.	Rizwan Ullah No. 1154/P	Traffic	27-9-2011	and S. Kamal Shah No. 1012/P SIs Muhammad Israr No. 1011/P
╞	43.	Farmani Gul No. 1155/P	CPC, Pesh:	27-9-2011	and S. Kamal Shah No. 1012/P SIs Muhammad Israr No. 1011/P
-	44.	Muhammad Naz No. 1156/P	CCP, Peshawar	27-9-2011	and S. Kamal Shah No. 1012/P
┝	45,	Hayat Muhammad No. 1157/P	Traffic	27-9-2011	SIs Ali Hussain No. 1013/P and Behram Gul No. 1014/P SIs Ali Hussain No. 1013/P and
.  -	46.	Yousaf Ali No. 1158/P	CCP, Peshawar	27-9-2011	Behram Gul No. 1013/P and Behram Gul No. 1014/P SIs Diyar Khan No. 1017/P and
╞	47.	Mujahid Shah No. 1315/P	CCP, Peshawar	27-9-2011	Sis Diyar Khan No. 1017/P and Said Malik No. 1018/P SIs Diyar Khan No. 1017/P and
$\vdash$	48.	Sangeen No. 1159/P	CCP, Peshawar	27-9-2011	Said Malik No. 1017/P and Said Malik No. 1018/P SIs Misri Gul No. 1022/P and Fazal
$\vdash$	49.	Shakir Hussain No. 1161/P	Traffic,	27-9-2011	Rahim No. 1022/P and Fazal Sis Hassan Khan No. 1028/P and
┝	50.	M. Tayyeb No. 1162/P	ACE	27-9-2011	Fazal Mabood No. 1029/P SIs Hassan Khan No. 1028/P and
┝	51.	Jamshid Khan No. 1163/P	Nowshera	27-9-2011	Fazal Mabood No. 1029/P SIs Hassan Khan No. 1029/P SIs Hassan Khan No. 1028/P and
$\vdash$	52.	Fazal Diyan No. 1164/P	СТО КРК	27-9-2011	Fazal Mabood No. 1029/P
$\vdash$	53.	Shakir Ullah No. 1165/P	Inv:CCP,Pesh:	27-9-2011	SIs Abid Rasheed No. 1031/P and Bakht Diyan No. 1032/P
-	54.	Wilayat No. 1166/P	Charsadda	27-9-2011	SIs Burhan ud Din No. 1033/P and M.Sabir No. 1034/P
$\vdash$	55.	Fazal Rokhan No. 1167/P	CTD KPK		SIs Inam Ullah No. 1035/P and Hassan Gul No. 1036/P
-	56.	Inayatur Rehman No. 1168/P	Nowshera	27-9-2011 27-9-2011	SIs Inam Ullah No. 1035/P and Hassan Gul No. 1036/P
	57.	Mukaram Shah No. 1169/P	Charsadda	27-9-2011	SIs Rooh ul Amin No. 1041/P and Murad Ali No. 1042/P
-	58.	M. Riaz No. 1170/P	СТД КРК	27-9-2011	SIs Sabir All No. 1045/P and Ihsan Shah No. 7/P
	59.	Tilawat Shah No. 1171/P	CCP, Peshawar	27-9-2011	SIs Qalsro Khan No. 1108/P and Mohd: Ibrahim No. 1046/P Sta Islam Shah No. 1047/P and
-	60.	Akhtar All No. 1172/P	Spl: Branch	27-9-2011	Fazal Rabi No. 1047/P and Fazal Rabi No. 1048/P Sis Fazal Rabi No. 1048/P and Faiz
-	61.	Muneer Khan No. 1173/P	Charsadda	27-9-2011	Sis Fazal Rabi No. 1048/P and Faiz Ullah No. 1049/P Sis Fazal Rabi No. 1048/P and Faiz
$\vdash$	62.	Sami Ullah No. 1174/P	Traffic	27-9-2011	ullah No. 1049/P and Faiz ullah No. 1049/P SIs Faiz Ullah No. 1049/P and
	63.	Haji Muhammad No.1175/P	Swabi	27-9-2011	Ikhtiar Ali No. 1049/P and Ikhtiar Ali No. 1050/P SIs Faiz Ullah No. 1049/P and
	64.	Amjad Ali No. 1331/P	Charsadda	27-9:2011	Ikhtiar Ali No. 1049/P and Ikhtiar Ali No. 1050/P SIs Faiz Ullah No. 1049/P and
	65.	M. Ibrar No. 1176/P	Lien transfer	27-9-2011	Ikhtiar All No. 1050/P SIs Alam Zeb No. 1051/P and
	66.	Fazal Elahi No. 1177/P	to Mardan Spl: Branch***	27-9-2011	Mohd: Ayaz No. 1052/P
	67.	Saleem Khan No.1178/P	Inv:CCP, Pesh	27-9-2011	SIs Mohd: Ayaz No. 1052/P and Gul Nawaz No. 1053/P
	58.	Hassan Gul No. 1179/P	Traffic	27-9-2011	SIs Nasrullah No. 1057/P and Jehan Zeb No. 1058/P SIs Shad Mubarmed No. 1058/P
F	59.	Silwar, Khan No. 1180/P	Inv:CCP,Pesh:	27-9-2011	Sis Shad Muhammad No. 1059/P and Khushal No. 1060/P Sis Shad Muhammad No. 1059/P
-	70. 1	Muhammad Alam No.1181/P	Nowshera	27-9-2011	and Khushai No. 1060/P
-		Asghar khan No. 1182/P	Traffic	27-9-2011	SIs Noor Haider No. 1061/P and Muhammad Zeb No. 1062/P
		Habib Ullah No. 1183/P	M/Way Police	27-9-2011	SIs Noor Haider No. 1061/P-and Muhammad Zeb No. 1062/P
		M. Tabrez No. 1184/P	CCP, Peshawar		SIs Noor Halder No. 1061/P and Muhammad Zeb No. 1062/P
			our, resuawar	27-9-2011	Sis Muhammad Zeb No. 1062/P and Hidayat Ullah No. 1063/P
7	74. 1	Sujaat Khan No.1185/P	Traffic	27-9-2011	SIs Muhd: Ishrat Yar No. 11066/P
L		·			and Syed Zaman No. 1067/P

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/75.	Sher Muhammad- 1186/P	CCP, Peshawar	27-9-2011 ,	SIs Muhd: Ishrat Yar No. 11066/P and Syed Zaman No. 1067/P
76.	Ihsan Ullah No. 1187/P	CPC, Peshawar	27-9-2011	SIs Hidayat Uliah No. 1070/P and Amir Nawab No. 1071/P
77.	Murad Ali No.72/78/CH	Charsadda	27-9-2011	SIs Hidayat Ullah No. 1070/P and Amir Nawab No. 1071/P
78.	Ghaffar All No. 1188/P	Charsadda	27-9-2011	SIs Ghafir Ullah No. 1073/P and Farukh Zada No. 1074/P
79.	Fayaz Mohd: No. 1190/P	CCP, Peshawar	27-9-2011	SIs Sabir Shah No. 1081/P and Fida Muhammad No. 1082/P
80.	Nasrullah No. 1191/P	Traffic .	27-9-2011	SIs Qayum Khan No.1088/P and Waris Khan No. 1089/P
81.	Masood Khan No. 1191/P	Charsadda	27-9-2011	SIs Waris Khan No. 1089/P and Sehat Ali No. 1090/P
82.	Said Umar No. 1192/P	Traffic	27-9-2011	SIs Sahib Gul No. 1094/P and Muhammad Jan No. 1095/P
83.	Fazal Bad Shah No.1193/P	Inv:CCP,Pesh:	27-9-2011	SIs Zain Ullah No. 1098/P and Nasrullah No. 1099/P
84.	Farld Shah No. 1194/P	Traffic	27-9-2011	SIs Nasrullah No. 1099/P and Inayatur Rehman No. 1100/P
85.	Iftikhar Hussain- 1195/P	CCP, Peshawar	27-9-2011	SIs Nasrullah No. 1099/P and Inayatur Rehman No. 1100/P
86,	M.Ibrahim No. 1196/P	CCP, Peshawar	27-9-2011	SIs Nasrullah No. 1099/P and Inayatur Rehman No. 1100/P
87.	Humayun No. 1197	Inv: KPK	27-9-2011	SIs Nasrullah No. 1099/P and Inayatur Rehman No. 1100/P

AL CITY POLICE OFFICER, PESHAWAR.

# No. 453-66 JEC-1,

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

1. Provincial Police Officer, Knyber Pakhtunkhwa, Peshawar.

2. Inspector General of Police NH & Motorway Police, Peshawar.

3. The Addi: Inspector General of Police, Special Branch KPK.

4. The Addl: Inspector General of Police, Investigation, KPK.

5. Deputy Inspector General of Police, CTD KPK, Peshawar

Deputy Inspector General of Police, Mardan Region.
Director Anti Corruption Establishment KPK.

Director Anti Corruption Establishment KPK.
SSP/Operation, Investigation & Traffic, Peshaw

SSP/Operation, Investigation & Traffic, Peshawar.
Commandant CPC University Campus, Peshawar.

10. District Police Officers, Charsadda, Nowshera & Swabi.

11. Asstt: Secret Branch, & 2C-II, CCP, Peshawar.

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#### POLICE DEPARTMENT

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#### CAPITAL CITY POLICE PESHAWAR

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

#### NOTIFICATION

No.1527/ EC-I, <u>Promotion to the rank of Offg: SI</u> 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 confirmed ASIs/SIs on acting charge basis of Capital City Police Peshawar on promotion list "E" are hereby promoted to the rank of Offg: SIs with immediate effect:-

S.No.	Name number & Ra		CCP No.	Present Posting
11	Mukamil Shah	(SI ACB)	809/P	CCP Peshawar
2	Inzar Gul	(SI ACB)	810/P	Charsadda.
3	Farhad Ali	(SI ACB)	811/P	Charsadda.
4	Shamshad L	(SI ACB)	812/P	Nowshera
5	Hazrat Ali	ASI	813/P	Motor Way
6	Sanobar Shah	ASI	814/P	Traffic
7	Fateh Roze	(SI ACB)	815/P	Traffic
8	Liagat Ali Y	(SI ACB)	816/P	Nowshera PRC (Hangu)
9	Qazi Aslam	(SI ACB)	817/P	ACE Charsadda
10	Siraj Rehman	(SI ACB)	818/P	CCP Peshawar
11	Ilyas Khan	(SI ACB)	819/P	CCP Peshawar
Q12	Inayat Ullah	(SI ACB)	820/P	Traffic
/13	Munir Khan	(SI ACB)	821/P	CCP Peshawar
14		[2+4/2+1(SI ACB)	822/P	Nowshera V
15	Muhammad Tufail	(SI ACB)	. 823/P	Traffic
16	Khushdil Khan	(SI ACB)	824/P	CCP Peshawar
17	Atlas Khan	(SI ACB)	825/P	Special Branch
187	Zafar Ali	(SI ACB)	826/P	Traffic
Ast	Nazeef ur Rehman	(SI ACB)	827/P	CCP Peshawar
20 .	Muqarab Khan	(SI ACB)	828/P	CCP Peshawar
21	Khalil ur Rehman	(SLACB)	829/P	Traffic
22	Shafi Ullah	(SI ACB)	830/P	CCP Peshawar
.23	Wajid Ali	(SI ACB)	831/P	Traffic KPK
24	Mukhtiar Ahmed	(SLACB)	832/P	CCP Peshawar
25	Khan Sahib	(SI ACB)	833/P	CCP Peshawar
26	Nadir Shah	(SI ACB)	834/P	Traffic
27	Jehangir	(SI ACB)	835/P	CCP Peshawar
28	Shahzada Khan	(SI ACB)	836/P.	CCP Peshawar
29	Noor Usman	(SI ACB)	837/P	Traffic
30	Abur Rashid	(SI ACB)	<u>838/P</u>	Special Branch
31	Ghaffar Ali	(SI ACB)	- 839/P	
32	Pervez Khan	(SI ACB)	the statement of the st	CCP Peshawar
33	Namdar Khan	(SLACE)	840/P	CCP Peshawar
34	Mushtaq Ali		841/P	CCP Peshawar
<u>34</u> 35	Shahjehan	(SLACB)	842/P	CCP Peshawar
36	Israr Muhammad	(SLACB)	<u>· 843/P</u>	CCP Peshawar
37		(SI ACB)	<u>844/P</u>	CCP Peshawar
38	Zawar Shah	(SLACB)	<u>845/P</u>	Traffic
	Khan Ghalib	(SI ACB)	<u>846/P</u>	CCP Peshawar
	Azeem Khan	(SLACB)	<u>847/P</u>	Traffic
	Sazwali	(SLACB)	848/P	Traffic
41	S.Farid Shah	(SI ACB)	849/P	CCP Peshawar
	Hanif Ullah	(SI ACB)	850/P	Campus
43	Sher Malik	(SI ACB)	<u>851/P</u>	CCP Peshawar
44	Naseem Khan	(SI ACB)	852/P	Traffic
45	Jan Alam	(SI ACB)	853/P	CCP Peshawar
46	Shams ul Hadi	(SI ACB)	854/P	Traffic
47	Waris Khan	(SI ACB)	855/P	CCP Peshawar
48	Imdad Ullah	(SI ACB)	856/P	CCP Peshawar
49	Jehanzeb	(SLACB)	857/P	PS Traffic
50	Muhammad Shahid	(SI ACB)	858/P	Traffic

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	51	Sardar Ali	(SI ACB)	859/P	RTC Attock
<b>L</b>	52	Muhammad Arif	(SLACB)	860/P	CCP Peshawar
	53	Abdul Qayyum	(SI ACB)	861/P	CCP Peshawar
	54	Misbah ud Din	(SI ACB)	862/P	Traffic
	55	Inavat Ur Rehman	(SI ACB)	863/P	Governor House
	56	Taibar Khan	(SI ACB)	864/P	CCP Peshawar
	57	Ashfaq Alam	(SI ACB)	865/P	Traffic
	58	Aziz ullah	(SI ACB)	866/P	Traffic
	59	Muhammad Naseem	(SI ACB)	867/P	Nowshera 💊
	· 60	Fazal Dad	(SI ACB)	868/P	Traffic
	61	Nasrat Ali	(SI ACB)	869/P	CCP Peshawar
	62	Gul Rehman	(SI ACB)	870/P	Traffic
	63	Muhammad Azeem	(SI ACB)	871/P	Traffic
	64 .	Ihsan ur Rehman	(SI ACB)	872/P	Nowerha 🛩
	65	Shamroz Khan	(SLACB)	873/P	Traffic
	66	Aziz ur Rehman	(SI ACB)	<u>874/P</u>	Traffic
	67	Madad Khan	(SI ACB)	875/P	Nowshera
				076/0	Nouchara
	68	Abdul Ghafoor	(SLACB)	876/P	Nowshera V
	69	Fazal Subhan	(SLACB)	877/P	Traffic . Traffic
•	70	Bakht Zali	(SI ACB) (SI ACB)	878/P 879/P	Traffic
	71	Musa Khan	(SI ACB)	<u>879/P</u>	Traffic
	72	Zakir Ullah Islah ud Din	(SI ACB)	<u>880/P</u>	Traffic
	73	Muhammad Shaheen Shah	(SI ACB)	<u>882/P</u>	Special Branch
			(SI ACB)	4/P	CCP Peshawar
	75	Mudassir Shah			CCP Peshawar
	76	Amir Siaf	(SLACB)	<u>883/P</u>	Traffic
	77	Aman Ullah	(SLACB) (SLACB)	884/P	Traffic
	78	Lai Zada	(SLACB)	885/P 886/P	Charsadda
	79 80	Muhammad Fazil	(SI ACB)	<u> </u>	CCP Peshawar
		Fazal Rehman Behroz Khan	(SI ACB)	888/P	Nowshera
	81	Zafar Ali	(SLACB)	889/P	Traffic
	83	Tajuddin	(SI ACB)	890/P	CPO
	84	Khial Wali	(SI ACB)	891/P	Traffic
	85	Bashir Gul	(SI ACB)	892/P	Traffic
	86	Muhammad Younas	(SI ACB)	893/P	Charsadda
	87	Jehangi Khan	(SI ACB)	894/P	CCP Peshawar
	88	Qaimat Bali	(SI ACB)	895/P	Nowshera 🗸
	89	Gul Nawaz	(SI ACB)	896/P	Traffic
	90	Aman ullah	(SI ACB)	* 897/P	Traffic
	91	Tilawat Shah	(SI ACB)	898/P	Traffic
	92	Muhammad Azam	(SI ACB)	899/P	CCP Peshawar
	93	Noor Ullah Jan	(SLACB)	900/P	CID
	94	Khial Nawaz	(SI ACB)	901/P	Nowshera 🗸
	. 95	Mushtaq Ali	ASI	902/P	Charsadda
	96	Anwar Khan 694	(SI ACB)	903/P	Charsadda
	. 97	Sher Alam	(SI ACB)	904/P	Special Branch
	98	Muhammad Qayyum	ASI	905/P	Nowshera
	99	Malang Jan	(SI ACB)	906/P	CCP Peshawar
	100	Alam Sher	(SLACB)	907/P	
	101	Masal Khan	(SI ACB)	908/P	Traffic
	102	Amir Muhammad	(SLACB)	909/P	Traffic
	103	Farman Ullah	(SLACB)	910/P	CCP Peshawar
	104	Hamid Ali	(SLACB)	<u>911/P</u>	Traffic
	105	Mir Hassan L	(SLACB)	912/P	Nowshera
	106	Jamshed Khan	(SLACB)	913/P	Traffic
	107	Hazrat Ali	(SLACB)	914/P	Nowshera
	108	Ghaffar Ali	(SLACB)	915/P	CCP Peshawar
	109	Arshullah	(SLACB)	916/P	
		Abdur Rauf Sardar Hussain	(SI ACB) (SI ACB)	<u>917/P</u> 918/P	ATS/Traffic Charsadda
	111	j Jaruar Hussalli		91072	i Chaisauud

					/
r	113	Qaiser Khan	(SI ACB)	92 VP	. Charsadda
	114	Dad Muhammad	(SI ACB)	921/P	CCP Peshawar
	115	Muhammad Diyar	(SI ACB)	922/P	CCP Peshawar
	116	Inayat ur Rehman	(SLACB)	923/P	CCP Peshawar
	117	Muhammad Iqbal	(SI ACB)	924/P	CCP Peshawar
	118	Umer Sher	(SI ACB)	925/P	CCP Peshawar
	119	Ghani ur Rehman	(SI ACB)	927/P	CCP Peshawar
	120	Bakht Munir	(SI ACB)	928/P	CCP Peshawar
h	121	Abid Saeed	(SI ACB)	929/P	CCP Peshawar
21	122	Sher Muhammad	(SI ACB)	930/P	Special Branch
$\sim$	123	Akhtar Gul	(SI ACB)	931/P	CCP Peshawar
	124	Fazal Karim	(SI ACB)	932/P	CCP Peshawar
منع معر	125	Khial Badshah	(SI ACB)	933/P	Traffic
	126	Hassan ul Wahab	(SI ACB)	934/P	Inv: CPO
	127	Ibrahim Khan	(SI ACB)	.935/P .	CCP Peshawar
	128	Waheed Shah	(SI ACB)	936/P	CCP Peshawar
-	129	Niamat Gui	ASI	937/P	Traffic
	130	Noor Gul	(SI ACB)	938/P	Traffic
	131	Sher Azam	ASI	939/P	Traffic
	132	Muhammad Ghani	(SI ACB)	940/P	CCP Peshawar
	133	Zakir Ullah	(SI ACB)	941/P	Traffic
	134	Muhammad Tahir	(SLACB)	942/P	CCP Peshawar
	135	Sardar Ali	(SI ACB)	943/P	Traffic
	136	Imtiaz Ahmed	. (SI ACB)	944/P	CCP Peshawar
	137	Istidar Khan	(SI ACB)	945/P	CCP Peshawar
	138	Anwar Shah	ASI	946/P	CCP Peshawar
	139	Safdar Khan	ASI	947/P	CCP Peshawar
	140	Inam ullah	ASI	948/P	CCP Peshawar
	141	Dost Muhammad	ASI	949/P	CCP Peshawar

ASIs 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 and 138 are promoted conditionally subject to the provision of their incomplete ACRs within 30-days otherwise they will be reverted to their substantive rank of ASI.

POLICE OFFICER CAPITAL CIT PESHAWAR

No. 1527

/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.
- The Additional Inspector General of Police, Investigation, KPK Peshawar with 02 spare copies of the Notification for publication in KPK Police Gazette Part-11.
- 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. The Director ACE Charsadda.
  - 13. EC-II CCP Peshawar.
  - 14. Assistant Secret CCP Peshawar with the direction to inform this office about the "C" reports / incomplete ACRs of the conditionally Offg: promoted SIs. On the expiry of stipulated period.

9







#### OFFICE OF THE SUPERINTENDENT OF POLICE COUNTER TERRORISM DEPARTMENT MARDAN REGION

No/477/CTD/Mardan Region dated 18 / 64 /2019

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

Subject: <u>APPLICATION IN RESPECT OF INSP MUHAMMAD NAWAZ KHAN</u> FOR SENIORITY

Respected Sir,

It is submitted that Inspector Muhammad Nawaz Khan NO. P-42 has submitted an application before undersigned in respect of his seniority. The same application along with enclosures is attached herewith for your kind perusal and further necessary orders as per rule, please,

Encl: (07) pages

Superintendent of Police, CTD, Mardan Region.

ASTED

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بخدمت جناب IGP ساحب خيبر پختو نخو ايشا در

درخواست بمراداصل بينمار في

عميثوان).

جناب عالي!

سائل حسب ذيل عرض كرتاب

- - ۴- سیر کسانگ اپنی ذیونی انتبانی ایمانداری اوردیا نیتراری سیندمرانجام دسند ما مون ادریمی چمی افسران بالاکوشکایت کاموقع نهیں دیا ہے۔
- ٣- بركساكل في بحوالدة رفير (90-3830 مورف، 10.07.2004 كوانترميذين كورس ودف، 31.10.2003 تا 10.2004 باس كيا ب

۲۔ پیدکسال 2005 میں جارسدہ اورنوشہرہ اخلاح کو بناور سے الگ کر سے مردان ریجن سے ماتھ دمسلک کے گیے بیٹی دنیدے چارسدہ اورنوشہرہ کے قمام HCs کومردان ریجن سے سینیارٹی کسٹ D کے bottom پر کھ گئے۔ ای طرح سال 2009 میں ایک بار بھر چارسدہ اورنوشہرہ کے اخلاع کودہ بار بکیش من بنا در سے ساتھ منسلک کر کے ایک بار بھر ان اخلاح کے قمام HCs کو بھر بناور کے سینیارٹی کسٹ D کے bottom پر کھے گئے۔

۵۰ ۱۳ ای با بت محمله bottom عن چارسده دنوشهرون جناب ۱۹۵ صاحب تیم بخنونو ایولسند D می دومرتبه bottom می رکین که خلاف ایک تحریری درخواست دی جس پرسابته ۱۹۵ صاحب مک نوید نه برایی می کردن کی بری 18564-65/2 مورند 27.07.2009 کوآر در پاس کرتے دونے قدام HCs هنگ چارسده دنوشهردا در ساته ای اصاحب بریشا در شریقینات کی سینیا د فی PTC یکو میرانداست سے مطابق دسینا که احکامات در آید نه دواادر قدام HCs است جوزیتر HCs کو پہلے پر موش دی گئی۔

۲- اس این میسروی فرینونی پنا درش بحوالد مردی این نیم کالد مردی این نیم که 40/2012 دائری بیسکونیخ صاحب سردی فریوشند مدرند 01.06.2015 کو فریپا رکمنگل این اقصار تی کو دائیس کرینے ہوئے ایک ماہ ش فیصلہ کرنے کا تھم صاور قرمایا۔ ساکل کے این کو جناب GP صا 3380/Legal مورعہ 15.07.2015 منظور کرنے ہوئے ریوائز پروموش تولیکیشن کو ڈیپا ڈمنٹل این اقتار ٹی کو دائیں ارسال کیا۔ جس پر جناب CCP پنا ور نے بحالہ نوئیکیش نیم ایک / 12882 مدر ہے 12.00.2015 کوسائل کی ریوائز پر دسوش کو ڈیپا ڈمنٹل این ایک 27.09.2015 کو

"However, he will not claim any financial back benefits" ۵۰ میرکه سال بوالدادینیکیش نبری 906۰07/ E ۱۱ مورود. 12.12.2018 کولیجده المیکور قاب دو پیکا ہوں۔ ۸۰ میرکه سال کے تمام کی میش اور دونیم اہلکاران ساکن سے پہلے سال 2014 میں انسپکور دوموت ہو پیک ہیں۔ سائل جونکه سینیارٹی کا حقدار ہے۔ ۹۶ بزرید در خواست استدعا ہے کہ سائل کواسپتانی میں سے ساتھ ہمطابق کسٹ PTC منگو سینیارٹی دسینے کانکم صادر فرماکر مظلور فرما تیں۔

DFUO-Sute-CTD MRD

العاريمن الي بينو تو نواز ذان تمبر 2-4- 1 متعينه أنتيجنس آخيسر CTO مردان ريجن مردان 17201-0827144-1 Aan 03168099199

R. Sin Forwarded for Swather appropriate orders as per rule please.

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SPCTOMR 18/04/2019.

12009

e Provincial Police Officer. NWPP, Peshawar.

e Capital City Police Officer. Peshawar

The

Deputy Inspector General of Police.
Mardan Region

-6.57 /E-11 dated Peshawar the 2.7

Subject: TRANSFER OF LIEN / FIXATION OF SENIORITY

Please refer to your Memo No. 922/ES dated: 21.03.2009 and No. 594/EC-I dated: 01.04.2009 respectively.

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 Winansfer 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 to accordance with the merit list published by ETC in their respective rank with their colleagues in the district. Moreover in case of officiating S1 their seniority will be fixed from the date of their confirmation as AS1 and admission to list E in the District opted.

In order to facilitate the officials, two options for transfer to either districts would be required i.e.  $t^{-1}$  and second option. If the vacancy is not available in the district optical 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 recording to availability of seats.

Please obtain the requisite option from all concerned and submit to this

office within ten days positively. MUAN KITURHITID ANWAS 00 [G/Legal neial Police Officer. Peshawar IES de la 28/2200 P Te Die Monostore an requisede office.



<u>بحدمت جناب CCPO صاحب پشاور</u>

<u>درخواست بمراد سینار کی</u>

<u> عنوان:</u>

جناب عالى:

سائل حسب ذيل عرض كرتا ہے۔

01- مد که سائل مورجه 13.01.1987 کومکمه پولیس میں ضلع پشاور میں بھرتی ہوا، اور آ جکل سرکل آ ٹی سراعلی جنس CTD مردان ریجن میں تعیینات ہوں۔ 02 - بیرکه ساکل پنی ذیو ٹی ایمانداری اور دیا نیڈاری سے سرانجام دیے رہا ہوں اورکھی بھی افسران بالاکو شکایت کاموقع نہیں دیا ہے۔ 03 - سائل فے لوئیر کورس 1995 میں بحوالہ چھٹی نمبر ک 8250-8179 مور خد 12.1995 کو پاس کیا ہے۔ 04- يدكر ساكل في بحوالدة رفر بسر 90-3830 مورند 10.07.2004 كوانتر ميذين كورس مورند 31.10.2003 تا 20.04.2004 پاس كيا -05 - بیر که سال 2005 میں چارسدہ اور نوشہرہ اصلاع کو بیثا در سے الگ کر کے مردان ریجن کے ساتھ منسلک کئے گئے جسکی دجہ سے نوشہرہ اور چارسدہ اصلاع کے تمام IHC کومردان ریجن کے سینیارٹی کسٹ D کے Bottom پرر کھے گئے۔ای طرح سال 2009 میں ایک بار پھرنوشہرہ اور چارسدہ کے اصلاع کوددبارہ کیپٹل ٹی پشادر کے ساتھ منسلک کر کے ایک بار پھران دونوں اصلاع کے تمام IHCs کو پھر پشاور CCP کے سنیارٹی لسٹ D سے Bottom پر کھے گئے۔ 06 - اس بابت جمله Bottom ضلع نوشمره اور جارسده نے جناب IGP صاحب جناب خیبر پختونخواه کولسٹ D میں دومر تبہ Bottom میں رکھنے کے خلاف ایک تحریری در خواست دی جس پرسابقہ IGP ملک نوید صاحب نے بحوالہ چھٹی انگریزی نمبر 18564-65/E مورجہ 2009-07-27 کوآرڈ رپاس کرتے ہوئے تمام IHCs صلع نوشهر بادر چارسده ادرساته بی Lien پر پشادر CCP میں تعینات کی سنیارٹی PTC میکو میرٹ اسٹ مے مطابق دینے کے احکامات جاری کے لیکن تا حال اس آرڈ ریر عمل در آمذ ہیں ہوا۔ اور نوشہر داور چارسدہ کے تمام CCP استه CCP پشاور میں جو نیئر IHCs کو پہلے پر وموثن دی گئ 07 - اس بابت سائل نے سروس ٹر بیونل پشاور میں بحوالہ سروس ایپل نمبر 40/2012 دائر کی ۔ جس کوسروس ٹر بیونل کو بچ صآحب نے مورجہ 2015-06-01 کو ڈیپار منٹل ایل اتھارٹی کوداپس کرتے ہوئے ایک ماہ میں فیصلہ کرنے کاتھم صادر فرمایا۔ سائل کے اپیل کو جناب IGP صاحب نے بحوالہ چھٹی انگریز ی نمبری 3380 لیگل مور<u>ضہ 2015-07-15 م</u>نظور کرتے ہوئے ریوائز پروموثن نوٹیفیکیشن کوڈیپا<sup>ڑ</sup>منٹل اپیل اتھار ٹی کوداپس کیا۔ جس پر جناب CCPO صاحب پیثا دریے بحواله توليكيش 12882/E-1 مورخه 06.2015 كوسائل كريوائز پروموش كر كمورخه 2011.09.201 كوبعهده سب انسيكم حسب زيل كمنش پاس "However,he will not claim any financial back benefits" مد کم سائل بحواله نویکشن نمبر ی 11-07/E مورخه 12.012.2018 کو بغیده انسپکرتر قیاب موچکاموں .. 08 - بید که سائل کے تمام پیچ میٹس اور جونئیر اصلکاران سائل سے پہلے سال 2014 میں انسپکٹر پر دموٹ ہو چکے ہیں ۔

09 -بذریعه درخواست استدعا هیکه سائل کی بعهده سب انسپنز کنفز میشن کوریوا تزکر کے اپنے نیچ میٹ کے ساتھ سینیار ٹی لسٹ میں شامل کرنے کا خکم صا در فرمادیں العارض مسلمینی تالیک مورختہ 102-90-6 ک

انسبکتر محد نواز خان P/42 منعینه اعلی عنس سٹاف می ٹی ڈی مردان

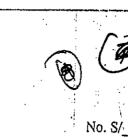
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17201-0827144-1



OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKIITUNKHWA Central Pol ce Office, Peshawar

/16, Dated Peshawar the 1810/12016.

### The Deputy Inspector General of Police, Mardan Region, Mardan.

REPRESENTATION FOR ANTEL ATING SENIORITY

595

266 -1-16-

Memo:

12

Subject:-

To:

# Meeting of Appeal Board was held on 23.12.2015 in CPO wherein the appeal of Sub-Inspector Muhammad Nawa:: No. 1114/P of your Region was examined in detail as the appellant joined Service Tribunal on which the Service Tribunal gave decision that appellant may file a Depareminal appeal about the said back benefit and to decide the case within a period of one month through a speaking order.

The board decided that the competent authority i.e RPO is empowered to promote him on his turn as per rules; his appeal is premature, therefore his appeal is hereby filed by the competent authority i.e W-IGP/Khyber Pakhtunkhwa on the recommendation of the Appellate/Review Board held on 23.12.2015.

# dt:21-1 Ed Dpo DSR

(MUHAMMAD ALAM SHINWARI) DIG/HQrs: For Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

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The Worthy Provincial Police Officer/ Inspector General of Police Khyber Pukhtunkhwa, Peshawar

2.

То

Subject: Appeal Against The Notification No.12882-EC-1 DATED 07/06/2015 TO THE EXTENT OF REFUSAL TO GRANT FINANCIAL BENEFIT TO THE APPELLANT.

# **Respectfully Sheweth:-**

I have the honour to submit the following few lines. to your kind consideration.

That vide notification No.5821-41/E-C/1 dated 1. 16.04.2014 I was promoted as Officiating SI, not contended with the same, I knocked at the door of the learned Service Tribunal Khyber Pukhtunkhwa, which was decided in my favour vide judgment dated 01.06.2015 in pursuance of the said judgment, the aforesaid notification was revised & I was promoted w.e.f 27.09.2011 instead of 16.04.2014, but financial benefit was declined, hence, this appeal.

That refusal to grant financial benefit to appellant illegal, without lawful authority, without jurisdiction & of no legal effect.

ATTELT

TESTED

That the appellant was not promoted w.e.f 27.09.2011 for no fault of him, therefore, he was entitled for the same, hence refusal to grant financial benefit w.e.f 27.09.2011 is not warranted by law.

3.

4.

That the appellant was under legitimate expectancy that he would be given financial benefit, but due to refusal to grant the same, his legal accrued & vested right has been infringed.

It is, therefore prayed that on acceptance of this appeal notification dated 07.06.2015 may be modified & the appellant be allowed financial benefit w.e.f 27.09.2011 in the interest of justice.

Appellant

M. Nawaz Khan-SI

**1114/P** District Nowshera

بحرالت KPK Appullant - 15.2019 Sorvi e 1.9. MAK 14. 60 ; 19 13 Allflen مقدمه دعوك & other جرم 0345-9028307 باعث تحريرا ينكه مقدمه مندرجة عنوان بالامين ابني طرف سے واسطے بيردي وجواب داي دکل کار داکم متعلقه آن مقام <u>محملوم</u> کیلئے <u>کو سمع کاری (شرایت)</u> مقرركر بے اقراركيا جاتا ہے۔ كہ صاحب موصوف كومقدّ مہ كى كل كاردائى كا كامل اخْتبار ، دِكَا بِ نِيز وسیل صاحب کوراضی نامه کرنے دنقر رثالت ہ فیصلہ برحلف دیہتے جواب دہی اورا قبال دعوی اور بصورت ذمري كرفي اجراءا ورصولي چيك وروسيار عرضى دعوى اور درخواست برتتم كي تصديق زرایں پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری کیطرفہ پا ہیل کی برامدگ ادرمنسوخی نیز دائر کرنے اپیل تکرانی دنظر ثانی دبیردی کرنے کا اختیار ہوگا۔از بصورت ضرورت مقد مہذکور کے کل پاجزوی کاردائی کے داسطے اور وکیل پامختار قانونی کوایے ہمراہ پاایے بجائے تقرر کا اختیار ہوگا۔اورمیا حب مقررشدہ کوبھی وہی جملہ مذکور ، بااختیا رات حاصل ہوں مے اور اس کا ساختہ برواخت منظور قبول ہوگا۔ دوران مقدمہ میں جوخرچہ دہرجانہ التوائے مقدمہ کے سبب سے دہوگا۔ کوئی تاریخ بیشی مقام دورہ پر ہویا حد سے باہر ہوتو دکیل صاحب پابند ہوں گے۔ کہ پیردی مدکورکریں۔لہذاوکالت نامہ کھدیا کہ سندر ·20 [4 - /g/ .1 الرتوم بمقاح APP-M-J -us W (Meind