

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

Service Appeal No. 312/2023

Zulfiqar Jadoon (Appellant)

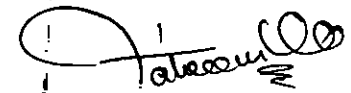
VERSUS

Government of Khyber Pakhtunkhwa etc (Respondents)

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DEPONENT



DSP/ Legal,
CPO, Peshawar

15-03-2024
Peshawar
S.B.

①

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 312/2023

Zulfiqar Jadoon (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa etc.....(Respondents)

PARA-WISE COMMENTS BY RESPONDENT NO. 1 TO 7

RESPECTFULLY SHEWETH:

**Khyber Pakhtunkhwa
Service Tribunal**

PRELIMINARY OBJECTIONS:-

Diary No. 11676

Dated 08-03-2024

- a) That the appeal is not based on facts.
- b) That the appeal is barred by law and limitation.
- c) That the appeal is not maintainable in the present form.
- d) That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
- e) That the appellant is estopped to file the instant appeal by his own conduct.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.
- g) That the appellant has got no cause of action and locus standi to file the instant Service Appeal.

FACTS:

1. Pertains to record of initial appointment of the appellant in Baluchistan Police department.
2. Pertains to inter-provincial transfer of the appellant from Baluchistan Police to Khyber Pakhtunkhwa Police and his subsequent permanent absorption thereof. However, the Hon'ble Supreme Court of Pakistan has deprecated such absorptions by laying down a very convincing principle vide its judgment reported in 2015 SCMR 456, operating para of which is reproduced below;

"Neither a person can be absorbed under these Rules nor a Civil Servant or non-civil servant nor could a deputationist be allowed to travel horizontally outside his cadre to penetrate into a different cadre, service or post through an appointment by transfer".

The Hon'ble Supreme Court of Pakistan in another Para of the same judgment has further elaborated the case in the following terms;

"We further clarify that even a civil servant cannot be transferred to any other cadre, department, posts or service unless he is eligible for such post, in terms of the rule 3(2) & qualifies the test of rules 4,6,7 & 8 of 1974 APT, Rules."

In this context, case of the appellant falls in the definition of out-of-turn promotion declared illegal, void ab initio by the Hon'ble Supreme Court of Pakistan in its landmark judgments reported in 2013 SCMR 1752, Civil Review Petition No. 193/2003 reported in 2015 SCMR 456, 2016 SCMR 1254, 2017 SCMR 206, 2018 SCMR 1218 and consolidated Judgment dated 30.06.2020 in Civil Petitions No. 1996, 2026, 2431, 2437 to 2450, 2501 and 2502 of 2019 on issues of Out of Turn Promotions. Moreover, in compliance with the order dated 26.01.2023 of the Hon'ble Supreme Court of Pakistan in Sua Moto Contempt proceedings vide Cr.L.O. Petition No. 38/2021 and in pursuance of the august apex court judgments ibid, all Unit Heads, Regional Police Officers and

District Police Officers of Khyber Pakhtunkhwa Police were directed vide this office Letter No. CPO/CPB/75, dated 14.02.2023 (copy is attached as **Annexure-A**) to ensure compliance of above mentioned orders of the august apex court in true letter and spirit. Accordingly, all Out of Turn Promotions earlier granted to KP Police personnel have been withdrawn by the concerned authorities and consequently their seniority has been re-fixed along with their batch-mates. Furthermore, in pursuance of the above mentioned Apex Court Judgments and to avoid contempt proceedings initiated against the department vide Crl.O. Petition No. 38/2021, Police personnel including the instant appellant who were appointed initially in Sindh Police, Baluchistan Police, Intelligence Bureau, Islamabad and National Highways and Motorways Police (NH & MP), Islamabad and were subsequently transferred/ absorbed on permanent basis in Khyber Pakhtunkhwa Police were repatriated to their respective Provinces and Parent Departments with immediate effect vide CPO Peshawar Order No. 594/E-1 dated 16.03.2023(copy is attached as **Annexure-B**).

3. Pertains to record however, as already explained vide above Para, such absorption has been declared illegal, unconstitutional and un-islamic by the august apex court in its judgments pertaining to out of turn promotions highlighted above. Hence, the same has been subsequently withdrawn by the respondent department.
4. Pertains to record and as already explained vide above Paras.
5. Pertains to promotion and confirmation orders of the appellant after his permanent absorption in the Khyber Pakhtunkhwa Police, however, all such promotions/confirmations have been declared illegal, void ab initio by the Hon'ble Supreme Court of Pakistan in its landmark judgments on issues of Out of Turn Promotions noted in the above Paras.
6. Already explained above.
7. Already explained above.
8. Pertains to seniority lists maintained for purpose of promotion of the Police Officers as per Rules.
9. Correct to the extent that the appellant's case was discussed in the Departmental Selection Board. However, he was not recommended for promotion for reason he was infringing upon the rights of other Police officers in terms of seniorities and promotions being absorbed from Baluchistan Police in Khyber Pakhtunkhwa Police and thus, his case was falling in the definition of out of turn promotion deprecated by the august Apex Court. Therefore, he could not be promoted as his case was hit by the judgments of the Hon'ble Supreme Court of Pakistan reported in 2013 SCMR 1752 and 2015 SCMR 456.
10. Pertains to the minutes of the Departmental Selection Board meeting dated 19.08.2022 wherein he was not considered for promotion because he was absorbed in Khyber Pakhtunkhwa Police from Baluchistan Police and falls under the Supreme Court judgment regarding absorption. Thus, in light of the august apex court judgments 2013 SCMR 1752 & 2015 SCMR 456 he was not considered for promotion.
11. Pertains to the departmental representation of the appellant however, same was devoid of merits in the light of the august apex court judgments regarding absorption. Pertinent to mention here is that after the repatriation order dated 16.03.2023 (already attached as Annexure-B), the appellant along-with others challenged the same by filing Writ Petition 1163-P/2023 before the Hon'ble Peshawar High Court, Peshawar by virtue of which the Hon'ble Court granted interim relief to the appellant. However during pendency of the petition ibid, the appellant got retirement on his own request vide Notification No. CPO/E-I/Retirement/1391 dated 18.05.2023 (Copy of the Notification and his application are attached as Annexure-C & D).
12. Incorrect, the appellant's case is hit by the judgments of the august apex court pertaining to absorption and out of turn promotions due to which he was not considered for promotion to the rank of SP. Moreover, the appellant got retirement on his own request in

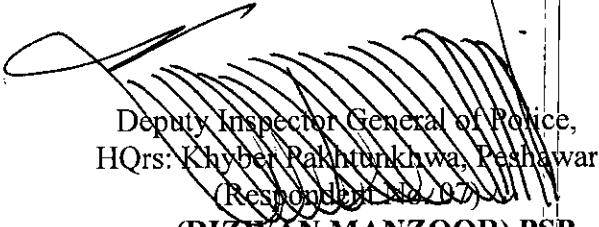
the rank of DSP. Therefore, the appellant has no locus standi to file the instant appeal and same is devoid of merits, liable to be dismissed on the following grounds;

GROUND:


- A) Incorrect, non-consideration of the appellant for promotion is quite in accordance with law/ rules/ legal/ lawful and effective in his case.
- B) Incorrect, the same is in accordance with the principles of natural justice.
- C) Incorrect, inter-provincial transfer and subsequent permanent absorption has been declared illegal, unconstitutional and un-islamic by the august Apex Court. Therefore, his promotion was infringing upon the rights of other Police officers hence, was rightly not considered for promotion to the next higher rank.
- D) Incorrect, the appellant availed the benefits of absorption and consequent out of turn promotion deprecated by the Hon'ble Supreme Court of Pakistan.
- E) Incorrect, as the induction of the petitioner in KP Police service was infringing upon the rights of other Police officials in terms of seniorities and promotions and the Hon'ble Supreme Court of Pakistan in its judgment reported in 2015 SCMR 456 has declared all kinds of promotions and confirmation subject to such absorptions as illegal, void ab initio, hence, was rightly repatriated to parent province Police and not considered for further promotion.
- F) Incorrect, such absorption has been declared illegal, unconstitutional and un-islamic by the august Apex Court.
- G) Incorrect, the trainings courses undergone by the appellant are the pre-requisite for his legitimate progression career in the parent department. He would have got his rights in the parent department equally after repatriation.
- H) Incorrect, the respondent never violated law rather acted in accordance with law/ rules.
- I) Pertains to record.
- J) Incorrect, the appellant was not considered for promotion as his case being that of permanent absorption and consequent out of turn promotion deprecated by the august Apex Court.
- K) Incorrect and misleading, the appellant was not considered for promotion by the Departmental Selection Board in the light of directions contained in the Apex Court judgments.
- L) Incorrect, the Apex Court has declared that the seniorities of all repatriated officers shall be fixed with their batchmates as if they were never repatriated.
- M) Incorrect, the appellant has neither been discriminated nor any constitutional provision has been violated.
- N) Incorrect, the respondent department has not violated the appellant' fundamental rights or any provision of the Constitution rather acted in pursuance of the judgments of the Hon'ble Supreme Court of Pakistan as well as in accordance with law/ rules.
- O) Incorrect, the respondent department has not acted devoid of law nor promoted nepotism or favoritism.
- P) Incorrect the Apex Court has declared that the seniorities of all repatriated officers shall be fixed with their batchmates as if they were never repatriated. Hence, he would have got his rights in the parent department equally after repatriation.
- Q) Incorrect and baseless as the appellant has been treated in accordance with law and in compliance of the august Apex Court judgments.
- R) Incorrect, the respondent department has not violated any constitutional provisions and acted in accordance with law/ rules and Apex Court judgments.
- S) The respondent department may also be allowed to adduce additional grounds at the time of hearing before the Hon'ble court.

PRAYERS:

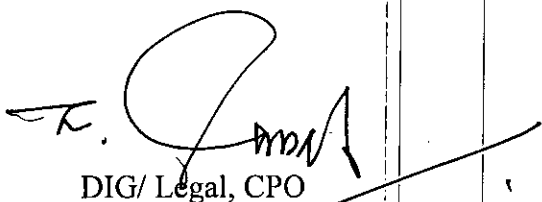
Keeping in view the above submissions, the instant appeal, being devoid of merits, not maintainable and barred by law, may kindly be dismissed with costs, please.



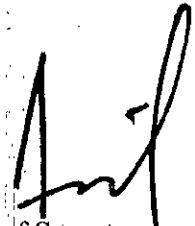
Deputy Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar
(Respondent No. 07)
(RIZWAN MANZOOR) PSP
Incumbent



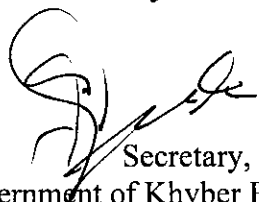
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar
(Respondent No. 06)
(AWAL KHAN) PSP
Incumbent



DIG/ Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(DR. MUHAMMAD AKHTAR ABBAS) PSP
(Respondent No. 5)
Incumbent

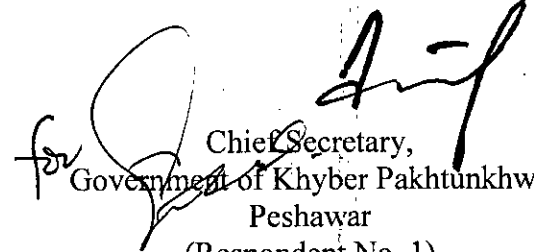


Additional Chief Secretary,
Government of Khyber Pakhtunkhwa,
Home & TAs Department, Peshawar
(Respondent No. 2)
(MUHAMMAD ABID MAJEED)
Incumbent



for Secretary,
Government of Khyber Pakhtunkhwa,
Establishment Department, Peshawar
(Respondent No. 3)
(SHAHID ULLAH)
Incumbent

Additional Chief Secretary
Home & T.As Department
Khyber Pakhtunkhwa.



for Chief Secretary,
Government of Khyber Pakhtunkhwa
Peshawar
(Respondent No. 1)
(NADEEM ASLAM CHAUDHRY)
Incumbent

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 312/2023

Zulfiqar Jadoon (Appellant)

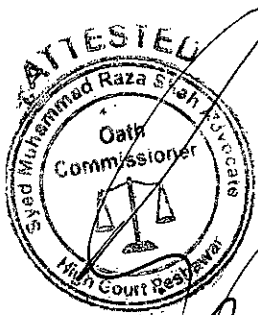
VERSUS

Government of Khyber Pakhtunkhwa etc.....(Respondents)

AFFIDAVIT

I, Rizwan Manzoor, Deputy Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar do hereby solemnly affirm on oath that the contents of Para-wise Comments on behalf of respondents No. 1 to 6 are correct to the best my knowledge and belief. Nothing has been concealed from this Hon'ble Tribunal.

The respondents neither been placed in custody nor their defense struck off/adj. DEPONENT



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

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 312/2023

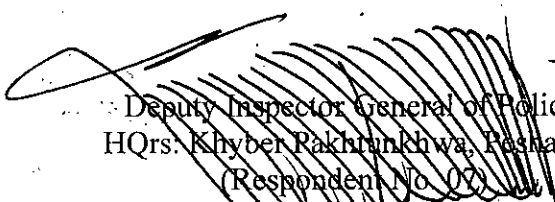
Zulfiqar Jadoon (Appellant)

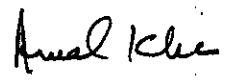
VERSUS

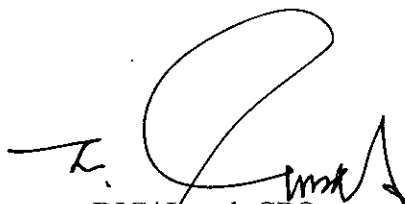
Government of Khyber Pakhtunkhwa etc.....(Respondents)

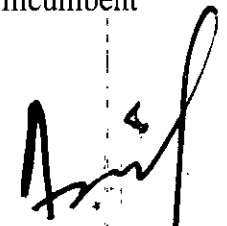
AUTHORITY LETTER

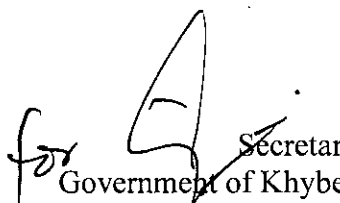
We, respondents No. 1 to 6 do hereby authorize Mr. Faheem Khan DSP/ Legal, CPO, Peshawar to submit Para-wise Comments/ Reply on behalf of respondents in captioned Service Appeal.

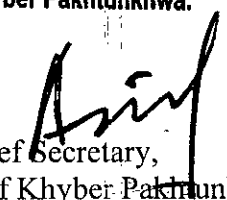

Deputy Inspector General of Police,
HQrs. Khyber Pakhtunkhwa, Peshawar
(Respondent No. 03)
(RIZWAN MANZOOR) PSP
Incumbent


Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar
(Respondent No. 06)
(AWAL KHAN) PSP
Incumbent


DIG/ Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(DR. MUHAMMAD AKHTAR ABBAS) PSP
(Respondent No. 5)
Incumbent


Additional Chief Secretary,
Government of Khyber Pakhtunkhwa,
Home & TAs Department, Peshawar
(Respondent No. 2)
(MUHAMMAD ABID MAJEED)
Incumbent


Secretary,
Government of Khyber Pakhtunkhwa,
Establishment Department, Peshawar
(Respondent No. 3)
(SHAHID ULLAH)
Incumbent

Additional Chief Secretary
Home & T.As Department
Khyber Pakhtunkhwa.

Chief Secretary,
Government of Khyber Pakhtunkhwa
Peshawar
(Respondent No. 1)
(NADEEM ASLAM CHAUDHRY) *
Incumbent



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

No. CPO/CPB/ 75

Dated Peshawar 14 February, 2023

COURT MATTER
MOST IMMEDIATE

To: All Heads of Unit Police,
Khyber Pakhtunkhwa,
The Regional Police Officers,
Malakand, Mardan, Hazara, Kohat and Hannu.
The Capital City Police Officer,
Peshawar.

Subject: COLLECTION OF DATA OF POLICE OFFICERS FALLING UNDER THE
DEFINITION OF OUT OF TURN PROMOTION.

Memo: Please refer to this office letter No. CPO/CPB/45, dated 27.1.2023 on the subject noted
above.

Perusal of record available with CPO and the reports coming from your range reveal
that there is an urgent need to personally examine case of each and every police officer who is deemed
to have been promoted out-of-turn.

2. You are, therefore requested to ensure that:-

i) Case of each police officer is examined afresh carefully with a view to ascertain as to
whether or not his/her promotion falls under the definition of out-of-turn promotion
provided in the following judgments of the Supreme Court of Pakistan:-

- i). 2013 SCMR 1752
- ii). 2015 SCMR 456
- iii). 2016 SCMR 1254
- iv). 2017 SCMR 206
- v). 2018 SCMR 1218

Note: copies of the judgments are being emailed to your Establishment Branch as a
ready reference and perusal.

ii) Those orders of promotion / confirmation are identified and recorded in your replies /
reports with a certified copy of the same attached therewith.

iii) A comprehensive reports on the line stated above may be submitted to this office by
20/02/2023.

Encl:
Sample Proforma of DI Khan Region.

ll
14/02/23

(SHAUKAT ABBAS) PSP
DIG/1Qrs,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Enclst: No. and dated even

Copy of above is forwarded for information to the:-

- 1. Additional Inspector General of Police, Headquarters, Khyber Pakhtunkhwa.
- 2. Deputy Inspector General of Police, Headquarters, Khyber Pakhtunkhwa.
- 3. Assistant Inspector General of Police, Legal, Khyber Pakhtunkhwa.
- 4. PSO to Inspector General of Police, Khyber Pakhtunkhwa.
- 5. PA to AIG/Establishment Khyber Pakhtunkhwa.

ll
14/02/23

(SHAUKAT ABBAS) PSP
DIG/1Qrs,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Attested
SW
8-3-24



(8)
**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA**

Central Police Office, Peshawar.

No.CPO/ 1594/EI dated the 16/03/2023. (118) J

NOTIFICATION

This Order is passed as per compliance of Order of Hon'ble Supreme Court of Pakistan dated 26.01.2023 in Suo Moto Contempt proceedings vide CrI.O. Petition No. 38/2021 and in pursuance of Judgments passed by Hon'ble Supreme Court of Pakistan in 2013 SCMR 1752, Civil Review Petition No. 193/2003 reported in 2015 SCMR 456, 2016 SCMR 1254, 2017 SCMR 206, 2018 SCMR 1218 and consolidated Judgment dated 30.06.2020 in Civil Petitions No. 1996, 2026, 2431, 2437 to 2450, 2501 and 2502 of 2019 on issues of Out of Turn Promotions. All Unit Heads of Khyber Pakhtunkhwa Police, Regional Police Officers and District Police Officers in Khyber Pakhtunkhwa Police were directed vide CPO Letter No. CPO/CPB/75, dated 14.02.2023, to ensure compliance of apex Court Order in letter and spirit.

2. In pursuance of the aforementioned judgments and Order of Hon'ble Supreme Court of Pakistan dated 26.01.2023 in Suo Moto Contempt proceedings vide CrI.O. Petition No. 38/2021, the following Police personnel who were appointed initially in Sindh Police, Balochistan Police, Intelligence Bureau, Islamabad & National Highways & Motorways Police (NH&MP), Islamabad were subsequently, transferred/absorbed in various cadres on permanent basis in Khyber Pakhtunkhwa Police, are hereby repatriated to their respective Provinces and parent Departments with immediate effect.

3. Details of officers being repatriated to their respective Provinces/ Departments are as under;

S. NO.	Rank (Current) Name & No.	Parent Department	Rank at the Time of Absorption	Date of Transfer/Absorption in KP Police
1.	DSP Zulfiqar Khan Jadoon	Balochistan Police	Sub-Inspector in 1998	No.SO(O&M1)/S&GA D/13-15/95, dated 10.01.1998
2.	DSP Waheed Khan	Intelligence Bureau Islamabad	Sub-Inspector in 1999	No.65-66/E-II, dated 01.01.1999
3.	DSP Jamil ur Rehman	Motorway Police Islamabad	Senior Petrol officer in 2011	No.22649-52/E-II, dated 20.10.2011
4.	DSP Waqar Ahmed	Balochistan Police	ASI in 1994	No.12522-28/13(5)A, dated 08.08.1994
5.	DSP Asad Mehmood	Balochistan Police	Sub-Inspector in 1998	No. 13787-88/E-II, dated 01.08.1998
6.	DSP Saleem Aman Ullah	Sindh Police	ASI in 1997	No.26406-9/E-II, dated 28.11.1997
7.	Inspector Muhammad Saeed No. H/156	Balochistan Police	ASI in 1998	No. 21580/E-II. dated 26.10.1998
8.	Inspector Muhammad Waheed No. H/77	Balochistan Police	SI in 2010	No.27648-49/E-II, dated 14.12.2010

A. A. Khan
8-3-24

(133) (9)

9.	Inspector Muhammad Taifoor Khan No. H/78	Balochistan Police	SI in 2011	No.21611-15/E-II, dated 08.10.2011
10.	Inspector Muhammad Ajmal No. H/72	Sindh Police	SI in 2013	No.31516/E-II, dated 26.12.2013
11.	SI Liaqat Ali No. H/176	Sindh Police	SI in 2014	No.1451-57/F-465/13/E-2/S.I Karachi, dated 21.02.2014.
12.	SI Asmat Ullah	Sindh Police	HC in 1998	No.1542-43/E-II, dated 22.01.1998
13.	Head Constable Kabir Ahmed No. 607	Sindh Police	HC in 2013	No.4796/E-II, dated 28.02.2013

3. The above mentioned repatriated officers are entitled for their seniority / promotional service benefits alongwith their batchmates as the Hon'ble Supreme Court of Pakistan passed the following orders in Crl. Review Petition No. 193/2013 about seniority on repatriation to parent department. Relevant Para of the Judgment is reproduced as under:-

"The officers/ officials who have been repatriated to their parent department shall be entitled to salaries and other benefits from the date they were relieved to join their parent departments. Their seniority shall be maintained in their parent departments with their batchmates as if they were never relieved from their parent departments. Expiry of period lien shall not come in the way of officers to deprive them for joining the parent department".

4. The concerned supervisory officers in Khyber Pakhtunkhwa Police are requested to relieve the above mentioned officers immediately from Khyber Pakhtunkhwa Police after completion of all codal formalities under intimation to this office with the direction to report to their parent departments.

This issues with the approval of Inspector General of Police, Khyber Pakhtunkhwa.

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

ATTESTED

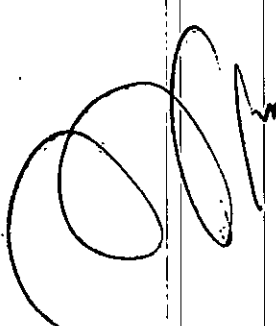
Attested
8-3-24

Copy for information and necessary action to:

1. The Chief Secretary, Khyber Pakhtunkhwa.
2. The Chief Secretary, Sindh.
3. The Chief Secretary, Balochistan.
4. The Director General, Intelligence Bureau, Islamabad.
5. The Inspector General of Police, Sindh, Karachi.
6. The Inspector General of Police, Balochistan, Quetta.
7. The Inspector General of Police, National Highways & Motorways Police.
8. The Accountants General, Sindh, Balochistan and Khyber Pakhtunkhwa.
9. The Addl: Inspector General of Police, Headquarters, Khyber Pakhtunkhwa Peshawar.
10. The Addl: Inspector General of Police, Operations, Khyber Pakhtunkhwa Peshawar.
11. All Regional Police Officers in Khyber Pakhtunkhwa.
12. All Heads of Units in Khyber Pakhtunkhwa Police.
13. Section Officer E-3 (Police) Govt: of Pakistan, Establishment Division, Islamabad.
14. Section Officer (Police-I) Govt: of Khyber Pakhtunkhwa, Establishment Department, Peshawar.
15. Section Officer (Police-II), Home & TA's Department, Khyber Pakhtunkhwa, Peshawar.
16. PSO to Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
17. Registrar, Central Police Office, Peshawar
18. All officers concerned.



(RIZWAN MANZOOR) PSP
Deputy Inspector General of Police, P.O.s
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar



ATTESTED

Attested
SW
78-3-24

جناب عالی :-

گزارش سے کہ سائل محکمہ پولیس میں 13.03.1982 میں بحیثیت PASI بھرتی ہو چکا تھا

سائل نے محکمہ پولیس میں 42 سال عرصہ ملازمت نہایت ایمانداری سے سرانجام دی ہے۔

سائل کا عمر مورخہ 14.06.2023 تک 60 سال پورے ہونے والے ہے۔

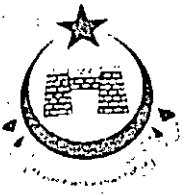
سائل بخوش خود محکمہ پولیس سے مورخہ 01.06.2023 کو ریٹائرمنٹ لینا چاہتا ہے۔

استدعا ہے کہ سائل کو مورخہ 1.06.2023 سے ریٹائرمنٹ پر جانے کا حکم صادر فرمائیں۔

تحریر 29.03.2023

الغرض
ذوالفقار خان جدون ڈائریکٹر پولیس سکول آف PDRM مردان

Attested
8-3-24



12

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA

Dated Peshawar the 18-05-2023

NOTIFICATION

No.CPO/E-I/Retirement/ 1391, Mr. Zulfiqar Khan Jadoon DSP (BS-17), presently posted as Acting SP/Director Police School of Public Disorder & Riot Management Mardan is hereby retired from service on his own request with effect from 01.06.2023.

He should deposit all Government belongings with relevant stores.

Sd/-
(SABIR AHMED) PSP
Additional Inspector General of Police,
HQrs, Khyber Pakhtunkhwa.

No. & date even.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Additional Inspector General Police, HQrs, Khyber Pakhtunkhwa.
3. Deputy Inspector General of Police, Training and HQrs, Khyber Pakhtunkhwa.
4. Director Police School of Public Disorder & Riot Management Mardan.
5. District Account Officer, Mardan.
6. AIG Welfare, Khyber Pakhtunkhwa.
7. AIG Legal CPO, Peshawar.
8. Budget Officer CPO Peshawar.
9. Registrar CPO Peshawar.
10. Officer Concerned.
11. Supdt: Secret CPO, Peshawar.
12. U.O.P File.

IRIZWAN MANZOOR, PSP
DIG Headquarters
For Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar

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Attested
3/2
18-3-29