

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 1049/2016

Date of institution ... 10.10.2016
Date of judgment ... 06.03.2018

Lal Zaman Shah, Constable No. 116,
Investigation Central Police Office, KPK, Peshawar.

... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home &
Tribal Affairs KPK, Peshawar and two others.

... (Respondents)

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE ORDER DATED 28.04.2016 WHEREBY THE
APPELLANT WAS DEMOTED TO LOWER RANK WITHOUT
ANY REASONABLE AND PROBABLE CAUSE, WHICH IS
ILLEGAL, AGAINST THE LAW AND FACTS.

Mr. Asif Ali Shah, Advocate.

.. For appellant.

Mr. Ziaullah, Deputy District Attorney

.. For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI

.. MEMBER (JUDICIAL)

MR. MUHAMMAD HAMID MUGHAL

.. MEMBER (JUDICIAL)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: - Learned counsel

for the appellant present. Mr. Ziaullah, Deputy District Attorney for the
respondents also present. Arguments heard and record perused.

2. Brief facts of the case as per appeal are that the appellant was serving in
Police Department as Constable. He was promoted as officiating Head
Constable and was performing his duties with punctually and regularly. That
there was no complaint against the appellant but the respondent No. 3 i.e

M. Amin
6.3.2018

Additional Inspector General of Police Investigation, KPK, Peshawar without any plausible reasons demoted the appellant from Head Constable to lower rank of Constable vide order no. 4021-26 dated 28.04.2016 illegally. That the appellant preferred departmental appeal but the same was not disposed of hence, the present service appeal.

3. Respondents were summoned who contested the appeal by filing written reply/comments.

4. Learned counsel for the appellant contended that the appellant was serving in Police Department as Constable. It was further contended that due to his excellence performance he was promoted as officiating Head Constable vide order dated 22.10.2010 by the competent authority. It was further contended that the appellant was performing his duties regularly and there was no complaint against the appellant but the respondent No. 3 i.e Additional Inspector General of Police Investigation, KPK, Peshawar without any plausible reason demoted the appellant from the rank of Head Constable to lower rank of Constable vide order dated 28.04.2016. It was further contended that neither any show-cause notice was issued to the appellant nor proper inquiry was conducted therefore, the impugned demotion order dated 28.04.2016 is illegal and liable to be set-aside.

5. On the other hand, learned Deputy District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended that the appellant was serving in Police Department as Constable. It was further contended that he was promoted to the rank of Head Constable on officiating basis till further order. It was further contended that the appellant was promoted out of turn. It was further contended that the promotion of the appellant was not on regular basis but on officiating charge basis which does not confer vested right of promotion on a civil servant. It was further contended that neither any departmental promotion committee was constituted nor any seniority was

W. Amin
6.3.2018

considered at the time of his officiating promotion to the rank of officiating Head Constable, therefore, the competent authority has rightly demoted him to his substantive rank and prayed for dismissal of appeal.

6. Perusal of the record reveals that the appellant was not regularly promoted from the post of Constable to Head Constable in prescribed manners. The record further reveals that the appellant was promoted as Head Constable on officiating basis and according to the law and rules such promotion on officiating charge basis does not confer vested right of promotion on the appellant. The record also reveals that neither any Departmental Promotion Committee was constituted nor seniority of the appellant alongwith others employees were considered. Meaning thereby the appellant was not promoted in the prescribed manners, hence, we do not find any merit in the instant appeal therefore, the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
06.03.2018



(MUHAMMAD HAMID MUGHAL)
MEMBER



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

Service Appeal No. 1049/2016

06.03.2018

Learned counsel for the appellant present. Mr. Ziaullah, Deputy District Attorney for the respondents also present. Arguments heard and record perused.

Vide our detailed judgment of today consisting of three pages placed on file, we do not find any merit in the instant appeal therefore, the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
06.03.2018



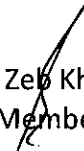
(MUHAMMAD HAMID MUGHAL)
MEMBER




(MUHAMMAD AMIN KHAN KUNDI)
MEMBER


21.07.2017

Appellant in person present. Mr. Karam Hayat, S.I
alongwith Mr. Ziaullah, Deputy District Attorney for the
respondents also present. Appellant requested for adjournment
on the ground that his counsel is not available today. Adjourned.
To come up for arguments on 20.11.2017 before D.B.


(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member


20.11.2017 Appellant in person present. Mr. Usman Ghani, District
Attorney Mr. Muhammad Raza Inspector for the respondents present.
Appellant requested for adjournment as his counsel is not available.
Adjourned. To come up for arguments on 03.01.2018 before D.B.

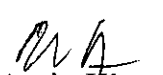

(Gul Zeb Khan)
MEMBER


(MUHAMMAD HAMID MUGHAL)
MEMBER

03.01.2018

Counsel for the appellant present. Asst: AG alongwith Mr.
Karam Hayat, SI for respondents present. Counsel for the appellant
requested for adjournment. Adjourned. To come up for arguments
on 06.03.2018 before D.B.


(Ahmad Hassan)
Member(E)


(M. Amin Khan Kundi)
Member (J)

1049/16


11.01.2017

Appellant in person and Mr. Sattar Khan, S.I alongwith Additional AG for the respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 15.02.2017 before S.B.


Chairman

15.02.2017

Clerk to counsel for the appellant and Mr. Ghulam Hussain, DSP alongwith Addl. AG for respondents present. Written reply submitted. To come up for rejoinder and final hearing on 05.04.2017.


(AHMAD HASSAN)

MEMBER

05.04.2017

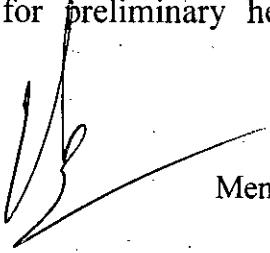
Counsel for the appellant and Mr. Asif Hussain, Sub-Inspector alongwith Mr. Adeel Butt, Addl: AG for the respondents present. Learned counsel for the appellant submitted rejoinder which is placed on file. To come up for final hearing on 21.07.2017 before D.B.

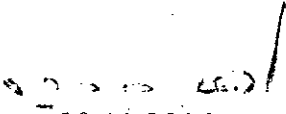

Chairman



15.11.2016

Counsel for the appellant present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 29.11.2016 before S.B.


Member


29.11.2016

Learned counsel for the appellant argued that the appellant was serving as Head Constable when reverted to the rank of Constable vide impugned order dated 28.04.2016 on the allegations of not qualifying for promotion for want of passing A-I, B-I examinations and lower school course where-against appellant preferred departmental appeal on 24.05.2016 which was not responded and hence the instant service appeal on 10.10.2016.

That the impugned order was passed without any notice to the appellant and despite the fact that the appellant had passed the requisite examinations including course which facts are also reflecting from official service record.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 11.1.2017 before S.B.

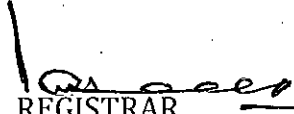


Appellant Deposited
Security & Process Fee


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1049/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/10/2016	<p style="text-align: center;">The appeal of Mr. Lal Zaman presented today by Mr. Asif Ali Shah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	13-10-2016	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>31-10-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	31.10.2016	<p style="text-align: center;">Agent of counsel for the appellant present. Seeks adjournment as counsel for the appellant is not in attendance. Adjourned for preliminary hearing to 15.11.2016 before S.B.</p> <p style="text-align: right;"> Chairman</p>

**BEFORE K.P.K, SERVICE TRIABUNAL, K.P.K,
PESHAWAR**

Appeal No 1049 /2016

Lal Zaman

Shah.....Appellan

t

Versus

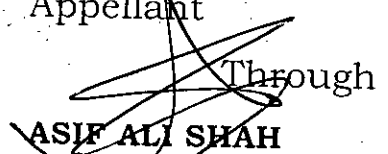
Govt of KPK &

Others.....Respondent

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S.NO.	PARTICULARS	ANNEXURES	PAGES NO.
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4	Wakalathnama		9


Appellant

Through

ASIF ALI SHAH
Advocates, Peshawar

Dated: 10.10.2016

1

**BEFORE K.P.K, SERVICE TRIABUNAL, K.P.K,
PESHAWAR**

Appeal No. 1049 /2016

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1079

Dated 10-10-2016

Mr. Lal Zaman Shah, Constable No.116, Investigation
Central Police Office, KPK, Peshawar.

.....Appellant

Versus

1. Government of KPK, through, Secretary Home & Tribal Affairs KPK, Peshawar.
2. Inspector General of Police, KPK, Peshawar.
3. Additional Inspector General of Police Investigation, KPK, Peshawar.

.....Respondents

**APPEAL U/S-4 OF THE CIVIL SERVANT ACT
AGAINST THE ORDER DATED: 28.04.2016 OF
THE RESPONDENTS NO.3, WHEREBY THE
APPELLANT WAS DEMOTED TO LOWER
RANK WITH OUT ANY REASONABLE AND
PROBABLE CAUSE, WHICH IS ILLEGAL,
AGAINST LAW AND FACTS.**

Prayer in Appeal:

Filed to-day
Q. J. J.
Registrar
10/10/16

**ON ACCEPTANCE OF THIS APPEAL ORDER
OF RESPONDENT NO.3, ORDER DATED.
28.04.2016 WHEREBY THE APPELLANT HAS
BEEN DEMOTED MAY PLEASE BE SET-ASIDE
AND THE APPELLANT MAY KINDLY BE
PROMOTED ACCORDING TO HIS
QUALIFICATION.**

2

Respectfully Sheweth

Facts:-

Appellant most humbly submits as under:

1. That the Appellant is serving as Constable, in the office of Additional Inspector General of Police, Investigation, KPK Police, Peshawar.
2. That the Appellant performing his job as head constable in the office of Additional Inspector General of Police, Investigation, , he is punctual / regular in his duties and no complaint against the appellant.
3. That the respondent No.3 with out any plausible reasons demoted the appellant from Head Constable to lower rank of constable vide Order No.4021-26 dated. 28.04.2016, which have no concern with the reality, and against law because the appellant has qualified A-I, and B-I.
{Copy of impugned Order and service record are attached as annexure-A & B}
4. That the Appellant preferred an appeal / representation to Respondent No.2 which is still pending.
(Copy of the appeal /representation is attached as Annexure-C).
5. That the same appeal is not dispose-off till yet and the statutory period has been elapsed.
6. That the impugned Order is illegal, against law and facts on the following grounds inter alia:-

GROUND:

- A. That the impugned order of Respondent No.3 dated. 28.04.2016 is against law, facts and material on record, hence liable to be set-aside.
- B. That the impugned order of demotion of the Appellant has been passed on political influence. It is evident from the impugned order which is violation of rules and legal provision and the authority did not used his mind independently but

impugned order has been passed on mala fide intention.

C. That the impugned demotion order is issued with out giving any opportunity of hearing to appellant and passed the impugned order without fulfilling the regal requirements and passed the impugned order in slipshod manner, such practice adversely effects efficiency of incumbents and also reduces their confidence and faith in public.

D. That the Appellant per policy of civil servant should be given an opportunity of hearing and the same has not been done, which seems to be injustice with Appellant.

E. That the appellant belongs to very poor family and according to civil servant laws and the demotion orders with out fulfilling the legal requirements is nullity in the eye of law and also against all norms of natural justice.

F. That the impugned Order dated, 28.04.2016 is totally based on political influence and mala fide intention is illegal, malafide, without jurisdiction and without lawful authority, therefore, is liable to be set-aside.

G. That the order of the Respondent No.3 suffers from legal and factual infirmities and mis-application of law as laid down by the August Supreme Court of Pakistan in subject.

IT IS, THEREFORE, RESPECTIVELY PRAYED THAT ON ACCEPTANCE OF THIS APPEAL ORDER OF RESPONDENT NO.3, ORDER DATED.

4

28.04.2016 WHEREBY THE APPELLANT HAS BEEN DEMOTED MAY PLEASE BE SET-ASIDE AND THE APPELLANT MAY KINDLY BE PROMOTED ACCORDING TO HIS QUALIFICATION WITH ALL BACK BENEFITS.



Appellant
Through:

ASIF ALI SHAH
&

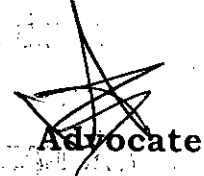
BILAL KHAN KHALIL
Advocate High Court, Peshawar



Dated:10.10.2016

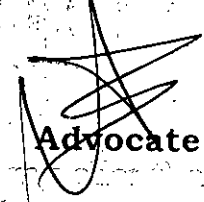
VERIFICATION:

It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.


Advocate

Note:

That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.


Advocate

ORDER

A
Amna
B

In compliance with the order of Inspector General of Police, Khyber Pakhtunkhwa, Peshawar received vide order No.S/2262-2312/16, dated 21.03.2016, the following officiating Head Constables of Investigation Unit CPO Peshawar promoted vide order No. 8843-46/Inv: dated 22.10.2010, order No. 615-20/SRC, dated 07.02.2012, No. 5451-58/Inv: dated 12.11.2002, No.3704-10/SRC/Inv, dated 31.07.2002, No. 2321- 28/SRC/CB dated 27.05.2002, No. 4026-29/CB dated 01.10.2001 & vide Order No. 4648-52/SRC/CB dated 10.11.2001 are reverted to their substantive rank of Constable with immediate effect as their promotion was not made in accordance with rules as they have neither qualified A-I, B-I examination nor they have undergone Lower School Course.

S.No	Name & Rank
01.	HC Lal Zaman Shah No.116
02.	HC Abdullah Shah No. 123
03.	HC Shah Wali No. 126
04.	IIC Fazal Dad No. 133
05.	HC Mohammad Fayaz No. 140
06.	HC Sarzamin No.143
07.	HC Mujahid Hussain No. 144

Mak
(DR.MASOOD SALEEM)PSP
DIG/HQrs: Inv:
For Addl: Inspector General of Police
Investigation, Khyber Pakhtunkhwa
Peshawar. 28/4

No. 4021-26
IIC/Inv: Date = 28/4/2016.

- Copy of above is forwarded for information & n/action to the:
1. Inspector General of Police Khyber Pakhtunkhwa Peshawar w/r to his Order No.S/2262-2312/16, dated 21.03.2016.
 2. Addl: IGP/Investigation KPK, Peshawar.
 3. SSP/Investigation
 4. SP/L.legal
 5. DSP/Admn/Investigation
 6. Accountant Investigation CPO.

ATTESTED

O. B. No: 14/Inv:
Date = 28/4/2016.

B Continued.

12. MISCELLANEOUS PARTICULARS

Anna 6

War Medals and Descriptions.—

12. Miscellaneous Particulars.

(NOTE—Enter designation of award and date only—Gazette Notification in case of Quaid-i-Azam Police Medal and the Pakistan Police Medal. Other special decoration to be entered full under commendatory entries.)

Light duty

Allowed light duty on medical treatment

CRSN 2355

17/5/92

Recruit course passed at RTe Nowshera during the term ending 2-6-92 vide RTe Nowshera No. dt

13. Miscellaneous particulars including awards others than those accompanied by commendation certificate and designation of removal from promotion lists.

Peshawar Range, Peshawar.

Passed A-I Examination held on 15-3-96 vide Dy. Comdt. P.T.C Hanger Memo No. 933-37/entry dt: 28-2-96.

ATTESTED

Name brought as present in B(i) vide RTe Hanger Memo No. 1161/5 dt 10th March, 1992

COMMANDANT Frontier Reserve Police N.W.F.P. Peshawar.

2

ORDER

Allowed TWO advance increments on the basis of higher qualification (B.A) with effect from 30.10.2001

Pay Fixed Rs. 2258/P.M ✓

Vide O.B. No. 207/CB

dt: 7/11/2001

N. Rahmani
For Addl. TG Inves:
NWFP Peshawar

Transfer of Lien

Lien transfer to Crimes Branch NWFP Peshawar vide 1st NWFP Peshawar Endst: No. 16329-33/E dt: 22.10.2001, O.B. NO. 199/CB dt: 25.10.2001 (Copy attached).

(Signature)

P.I as Const at Rs. 3600 P.M
w.e from 1.12.2001

N. Rahmani
For DIC/Police CB,
NWFP Peshawar.

52/19/11

ATTESTED

P.I as Const at Rs. 3600 P.M
w.e from 1.12.2001

N. Rahmani
For DIC/Police CB,
NWFP Peshawar.

Pay fixed provisionally in the revised basic pay scale No. 5 of Rs. (2100-100-5100) at Rs. 3500 P.M w.e from 1.12.2001

N. Rahmani
For DIC/Police, CB,
NWFP, Peshawar.

P. I. as Const at Rs. 3700 P.M
w.e.f. from 1.12.2001

Manshi
For Addl. TG Inves:
NWFP Peshawar.

Confirmation

Confirm as Constable vide O.B. No. 13/Muesi dated 14.05.2005.

N. Rahmani
Addl. Inspector General of Police
Investigation NWFP, Peshawar.

P. I. as Const at Rs. 3800 P.M
w.e.f. from 1.12.2001

Manshi
For Addl. TG Inves:
NWFP Peshawar

رحم کی اپیل

Amir (8)

جناب عالی!

گزارش ہے کہ سائل 17-8-1991 میں ڈسٹرکٹ پولیس پشاور میں بطور کانسٹیبل بھرتی ہوا۔ سائل BA پاس تعلیم یافتہ ہے۔ سائل نے ریکروٹ کورس 8-6-1992 کو RTC نوشہرہ سے پاس کیا۔ اور A-1 کا امتحان 15-3-1996 کو اچھے نمبروں سے پاس کیا اور B-1 کا امتحان 10-3-1998 کو اچھے نمبروں سے پاس کیا۔ سائل کا تبادلہ ڈسٹرکٹ پولیس پشاور سے جلد ہی FRP کیا گیا تھا۔ 30-11-1993 کو افسران بالا کے حکم پر سائل کو کمانڈنٹ FRP صاحب کے ساتھ بطور ٹیلی فون آپریٹر تعینات کیا گیا۔ اور سائل اپنی ڈیوٹی نہایت خوش اسلوبی سے سرانجام دینے لگا۔ سائل کو مورخہ 1-9-1998 کو افسران بالا کے حکم پر کرائم برانچ تبدیل کیا گیا۔ مورخہ 24-11-2001 بحوالہ لیٹر نمبر 4865-70 کو سائل کا لین (Lien) کرائم برانچ کیا گیا۔ ایک تو سائل کی ڈیوٹی ایسی تھی کہ اس میں کورسز کرنا مشکل ہوتا ہے اور اس وقت کرائم برانچ میں کوئی کوٹہ نہیں تھا کہ سائل لوئیر کورس کرتا۔ سائل نے کافی محنت اور کوشش کی تھی کہ لوئیر کورس انٹر کورس وغیرہ ضرور کرے تاکہ سائل کو پروموشن مل سکے جس طرح سائل کے دوسرے ساتھی جو میٹرک پاس ہیں اور آج کل DSP، انسپٹر اور سب انسپٹر کے عہدوں پر تعینات ہے۔ مورخہ 7-12-2007 کو سائل کا لین (Lien) بحوالہ لیٹر نمبر 27529-32 واپس CCP پشاور کیا گیا۔ تو اس وقت سائل اور تاج (Overage) ہو چکے تھے۔ جس کا سائل کو فائدہ نہ ہو سکا۔ سائل نے جناب ایڈیشنل IGP صاحب انوسٹی گیشن کو درخواست کی سائل کا تعلیم BA پاس اور A-1 اور B-1 امتحان پاس ہے۔ کم از کم سائل کو ہیڈ کانسٹیبل پر مویشن دی جائے۔ جناب ایڈیشنل آئی جی پی صاحب نے مورخہ 22-10-2010 کو بحوالہ لیٹر نمبر 8843-46 سائل کو ہیڈ کانسٹیبل پر مویشن دی۔ مورخہ 28-4-2016 کو بحوالہ لیٹر نمبر 4021-26 واپس ہیڈ کانسٹیبل سے کانسٹیبل بنایا گیا کہ سائل A-1، B-1 اور لوئیر کورس پاس نہیں چونکہ سائل A-1، B-1 امتحان پاس کر چکا ہے۔ اور سائل کو لوئیر سکول کورس کرنے کا موقع نہیں دیا گیا۔ جو کہ سائل نے کافی کوشش کی تھی۔ سائل نے کبھی اپنی ڈیوٹی میں افسران بالا کو شکایت کا موقع نہیں دیا اور اپنی ڈیوٹی نہایت ایمانداری سے سرانجام دی ہے۔ جس طرح سپیشل برانچ میں ون سٹیپ پر مویشن یعنی ہیڈ کانسٹیبل کو برقرار رکھا گیا ہے۔ اسی طرح سائل کو تعلیم کورسز کو مد نظر رکھتے ہوئے سائل کو بھی واپس اپنے عہدے ہیڈ کانسٹیبل پر بحال کیا جائے۔

لہذا آپ صاحبان سے ذریعہ درخواست استدعا ہے کہ سائل کو واپس کانسٹیبل سے ہیڈ کانسٹیبل عہدہ پر بحال کیا جائے۔ جس کے لیے تاعمر سائل اور سائل کے بچے دعا گوہ رہیں گے۔

عین نواز ہوگی۔
ATTESTED

العارض

آپ کا تابعدار کانسٹیبل لعل زمان شاہ نمبر 116 انوسٹی گیشن، سی پی او
حال متعینہ ٹیلی فون آپریٹر جناب ایڈیشنل آئی جی پی ہیڈ کوآرڈر سی پی او۔

Fareed, R.

24/5/16

24/5/16



67567

ایڈووکیٹ/دستخط: _____
 بار کونسل ابار ایسوسی ایشن نمبر: 1389
 رابطہ نمبر: 0333 9006806

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سر سید سید خیر ظہیر خاں خواہ

دعویٰ: سر سید اجیل	مخانب: لال زمان
علت نمبر: _____	لال زمان
مورخہ: _____	بنام
جرم: _____	حکومت
تھانہ: _____	

بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 ان مقام سید سید اجیل بلال خان ضلعی افسر علی سکا کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقررات و فیصلہ برطنت دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اجیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اجیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب
 مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پداختہ منظور و قبول ہوگا دوران مقدمہ
 میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام
 دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے۔

المرقوم: 10-10-2016

بند _____ واہ شد _____ بند _____

کے لئے منظور ہے۔

لال خان ضلعی افسر علی سکا

PL

17101-4404522-1

نوٹ: اس وکالت نامہ کی فونو کاپی نامتامل قبول ہوگی۔

Accepted

M. Ader

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Service APPEAL NO 1049/2016

Lal Zaman Shah(Appellant)

VERSES

1. Government of Khyber Pakhtunkhwa, through secretary Home and TA's Deptt: Khyber Pakhtunkhwa Peshawar.
2. The Inspector General of Police Khyber Pakhtunkhwa Peshawar.
3. The Addl: Inspector General of Police Investigation Khyber Pakhtunkhwa, Peshawar. (Respondents)

Subject: **PARAWISE COMMENTS TO APPEAL ON BEHALF OF RESPONDENT'S.**

Respectfully shewith.

The Para-wise comments to Appeal on behalf of respondents are submitted as below:-

Preliminary objections.

1. That the Appellant has got no cause of action to file instant appeal.
2. That appeal is not maintainable.
3. That the Appellant has not come to this honorable Tribunal with clean hands.
4. That the Appeal is bad due to mis-joinder and non joinder of for necessary parties.
5. That appeal is time barred. ✓

Facts.

1. That Para No I pertains to record, needs no comments.
2. Incorrect, the appellant was reverted to his substantive rank of constable by the Competent Authority i.e Respondent No 3 vide Order No 4021-26 /EC /inv dated 28.04.2016 as promotion order was in contravention of Police rule13-7(1).

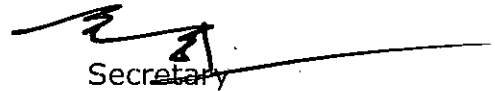
3. Incorrect , infact, the appellant and other Police officials mentioned in Order No 4021-26/EC/Inv dated 28.04.2016 were reverted to their substantive rank of constables in compliance of order No S/2262-2312/16 dated 21.03.2016 passed by respondent No 2, as their promotions were not made in accordance with rules. The appellant qualified A1 and B1 examination but he has not undergone to lower School Course mandatory for promotion to the post of head constable under rule 13-7(1) of Police rules 1934.
4. Incorrect, instead the Appeal/Mercy petition filed by the appellant was decided by respondent No 2 vide No 8671/E-IV dated 02.09.2016 (copy enclosed).
5. Incorrect, already explained vide Para No. 4 above.
6. Incorrect, the order of reversion of appellant to substantive rank of constable is quite legal and in accordance with the provisions of police rules 13-7(1) and 13-8 of Police rules 1934.

Grounds .

- A: Incorrect, the order of demotion /reversion of appellant and others passed by the respondent No 3 is quite legal because respondent NO3 being a competent authority was empowered to withdraw promotion Order due to noticing of error and irregularity in the order.
- B. Incorrect, instead the Order of demotion/reversion passed by respondent No.3 was not due to any Political influence but it was proper in accordance with the law/rules.
- C. Incorrect, Proper opportunity of hearing was provided to appellant and others ordered reverted to substantive rank of Constables in compliance of order passed by respondent No. 2 on the direction of Khyber Pakhtunkhwa Service Tribunal Peshawar in consolidated Judgment dated 16.11.2015 in Service Appeal No's 561,563,565,537,715 and 538/2014 filed by ASI's and SI's of investigation CPO Peshawar whose appeals were remitted with the direction to Departmental Authorities to decide the same on merit and without any discrimination.

- D. Incorrect, already explained vide ground C above.
- E. Incorrect, no injustice was done to the appellant and reversion order was passed after fulfilling all legal formalities by the respondent No.3
- F. Incorrect, The demotion orders were not passed by the respondent No.3 due to any Political influence instead it was result of noticing irregularity already explained in para No. 2 and 6 of reply to the facts.
- G. Incorrect, instead the order passed by the respondent No.3 was strictly in accordance with law/rules and guideline given by Apex Court Supreme Court of Pakistan on the subject.

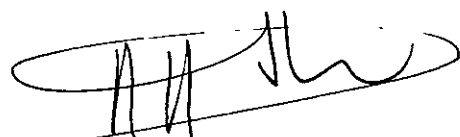
In the light of above facts and circumstances it is requested that Appeal filed by the appellant may be filed being based on flimsy ground.



Secretary

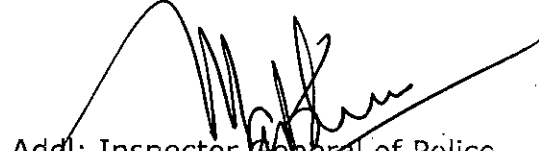
Home & TAs Department
Government of Khyber Pakhtunkhwa
Peshawar.

(Respondent No1)



Inspector General of Police
Khyber Pakhtunkhwa, Peshawar.

(Respondent No2)



Addl: Inspector General of Police,
Investigation Khyber Pakhtunkhwa,
Peshawar.

(Respondent No3)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Service APPEAL NO 1049/2016

Lal Zaman Shah(Appellant)

VERSES

1. Government of Khyber Pakhtunkhwa, through secretary Home and TA's Deptt: Khyber Pakhtunkhwa Peshawar.
2. The Inspector General of Police Khyber Pakhtunkhwa Peshawar.
3. The Addl: Inspector General of Police Investigation Khyber Pakhtunkhwa, Peshawar. (Respondents)

COUNTER AFFIDAVIT.

We, the respondents No.1 to 3 do hereby solemnly affirm and declare on oath that contents of reply to Service Appeal are correct to our knowledge and belief and nothing has been concealed from Honorable Tribunal.



Secretary

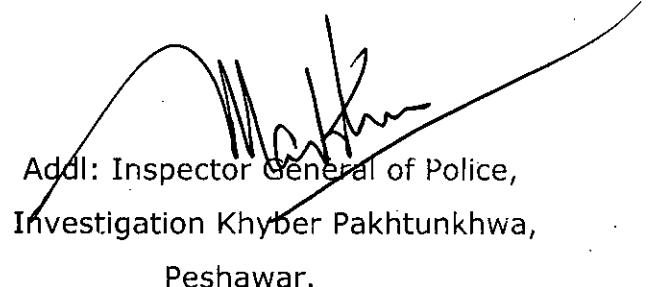
Home & TAs Department
Government of Khyber Pakhtunkhwa
Peshawar.

(Respondent No1)



Inspector General of Police
Khyber Pakhtunkhwa, Peshawar.

(Respondent No2)



Addl: Inspector General of Police,
Investigation Khyber Pakhtunkhwa,
Peshawar.

(Respondent No3)



3-14/016
 OFFICE OF THE
 INSPECTOR GENERAL OF POLICE
 KHYBER PAKHTUNKHWA
 Central Police Office, Peshawar

No 8671 /E-IV dated Peshawar the 9/9/2016

To: The Addl. IGP/Investigation,
 KPK, Peshawar

Subject: MERCY PETITION

Memo.

3544
 -5-9-2016

Constable Lal Zaman Shah No. 116 of your unit on loan to CPO Peshawar was submitted a Mercy petition regarding his demotion order from Head Constable to the rank of Constable has been examined by the competent authority and filed.

Applicant may please be informed accordingly.

EIO

(PERVEZ ILLAHI)
 Registrar

For Inspector General of Police,
 Khyber Pakhtunkhwa, Peshawar.

Add: Inspector General of Police,
 Investigation
 Khyber Pakhtunkhwa, Peshawar.

5/9/16
 در فواید میں اظہار
 5/9/16

5/9/16
 5/9/16

RK
 File

 6/9/16

24/05/2016
 24/05/2016

جناب عالی! گزارش ہے کہ سائل 17-8-1991 میں ڈسٹرکٹ پولیس پشاور میں بطور کانسٹیبل بھرتی ہوا۔ سائل BA پاس تعلیم یافتہ ہے۔ سائل نے ریکروٹ کورس 8-6-1992 کو RTC نوشہرہ سے پاس کیا۔ اور A-1 کا امتحان 15-3-1996 کو اچھے نمبروں سے پاس کیا اور B-1 کا امتحان 10-3-1998 کو اچھے نمبروں سے پاس کیا۔ سائل کا تبادلہ ڈسٹرکٹ پولیس پشاور سے جلد ہی FRP کیا گیا تھا۔ 30-11-1993 کو افسران بالا کے حکم پر سائل کو کمانڈنٹ FRP صاحب کے ساتھ بطور ٹیلی فون آپریٹر تعینات کیا گیا۔ اور سائل اپنی ڈیوٹی نہایت خوش اسلوبی سے سرانجام دینے لگا۔ سائل کو مورخہ 1-9-1998 کو افسران بالا کے حکم پر کرائم برانچ تبدیل کیا گیا۔ مورخہ 24-11-2001 بحوالہ لیٹر نمبر 4865-70 کو سائل کا لین (Lien) کرائم برانچ کیا گیا۔ ایک تو سائل کی ڈیوٹی ایسی تھی کہ اس میں کورسز کرنا مشکل ہوتا ہے اور اس وقت کرائم برانچ میں کوئی کوٹہ نہیں تھا کہ سائل لوئیر کورس کرتا۔ سائل نے کافی محنت اور کوشش کی تھی کہ لوئیر کورس انٹر کورس وغیرہ ضرور کرے تاکہ سائل کو پروموشن مل سکے جس طرح سائل کے دوسرے ساتھی جو میٹرک پاس ہیں اور آج کل DSP، انسپٹر اور سب انسپٹر کے عہدوں پر تعینات ہے۔ مورخہ 7-12-2007 کو سائل کا لین (Lien) بحوالہ لیٹر نمبر 27529-32 واپس CCP پشاور کیا گیا۔ تو اس وقت سائل اور راج (Overage) ہو چکے تھے۔ جس کا سائل کو فائدہ نہ ہو سکا۔ سائل نے جناب ایڈیشنل IGP صاحب انوشی گیشن کو درخواست کی سائل کا تعلیم BA پاس اور A-1 اور B-1 امتحان پاس ہے۔ کم از کم سائل کو ہیڈ کانسٹیبل پر پروموشن دی جائے۔ جناب ایڈیشنل آئی جی پی صاحب نے مورخہ 22-10-2010 کو بحوالہ لیٹر نمبر 8843-46 سائل کو ہیڈ کانسٹیبل پر پروموشن دی۔ مورخہ 28-4-2016 کو بحوالہ لیٹر نمبر 4021-26 واپس ہیڈ کانسٹیبل سے کانسٹیبل بنایا گیا کہ سائل A-1، B-1 اور لوئیر کورس پاس نہیں چونکہ سائل A-1، B-1 امتحان پاس کر چکا ہے۔ اور سائل کو لوئیر سکول کورس کرنے کا موقع نہیں دیا گیا۔ جو کہ سائل نے کافی کوشش کی تھی۔ سائل نے کبھی اپنی ڈیوٹی میں افسران بالا کو شکایت کا موقع نہیں دیا اور اپنی ڈیوٹی نہایت ایمانداری سے سرانجام دی ہے۔ جس طرح سپیشل برانچ میں دن سٹیپ پر پروموشن یعنی ہیڈ کانسٹیبل کو برقرار رکھا گیا ہے۔ اس طرح سائل کو تعلیم کورسز کو مد نظر رکھتے ہوئے سائل کو بھی واپس اپنے عہدے ہیڈ کانسٹیبل پر بحال کیا جائے۔

لہذا آپ صاحبان سے ذریعہ درخواست استدعا ہے کہ سائل کو واپس کانسٹیبل سے ہیڈ کانسٹیبل عہدہ پر بحال کیا جائے۔ جس لیے تاعمر سائل اور سائل کے بچے دعا گو رہیں گے۔

عین نواز ہوگی۔

العارض

آپ کا تابع دار کانسٹیبل لعل زمان شاہ نمبر 116 انوشی گیشن، سی پی او
 حال متعینہ ٹیلی فون آپریٹر جناب ایڈیشنل آئی جی پی ہیڈ کوآرڈر سی پی او۔

Fawaz, M.

24/5/16

24/5/16

BEFORE THE HON'BLE SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.1049/2016

Lal Zaman Shah _____ Appellant

Versus

Govt of KPK & others _____ Respondents

REJOINDER ON BEHALF OF APPELLANT**Respectfully Sheweth:**

The appellant most humbly submits his rejoinder as under:

Reply to Preliminary Objections:

All the preliminary objections raised by the Respondents in their written para wise comments are wrong, incorrect and baseless, hence expressly denied.

The appellant has got locus standi / cause of action against the respondents. The appellant contacted this Hon'ble Court with clean hands and bona fide intention for redressal of his grievances. The appeal of the Appellant is based on cogent and reliable grounds. The appeal is self explanatory and all the facts of the case favour the stance of the appellant.

Reply to factual Objections:

1. Para No.1 needs no reply. The respondent made evasive denial which means admission in the law. It is pertinent to mention here that the appellant was appointed as constable on 17-08-1991 in District Police Peshawar and after completion of training appellant was transferred to Frontier Reserve Police and posted

as Telephone operator in the office of Commandant FRP. On 01-09-1998 appellant was transferred to Crime Branch and through Letter No.4865-70 dated:24-11-2001 the appellant was transferred on lien permanently to Crime Branch. It is very surprising to note that lien of appellant along with others again transferred to CCP Peshawar through order No. 27529-32 dated: 01.12.2007. but the appellant till date serving telephone operator in the office of Additional Inspector General of Police and on his best performance and duty the appellant was awarded numerous awards / certificates. {Copies of relevant documents are attached}

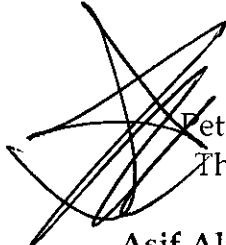
2. Para No.2 & 3 of the comments is wrong, incorrect, false and against the facts. The respondents misguiding this Hon'ble court by mis quoting & mis-interpreting the Police rules. The Respondents issued the reversion order in cursory manner with mala fide intention. The reversion order is against law and facts and meritless. Respondents intentionally changed the uniform policy / process for promotion of C-II police officials and prepared self engineered method / policy malafidely, which act of the Respondents is illegal, void-ab-initio, without jurisdiction, in excess of jurisdiction and result of ultra vires, hence liable to be declared as such. The respondents did not send for the appellant for A-I & B-I course which is in the power and control of the respondents and the innocent appellant is sub-ordinate and he himself cannot go for course, hence this pleas of the respondents is against the law, facts and norms of justice. All the paras of the appeal are based on reality and true facts hence the appeal merits acceptance.
3. Paras No.4 & 5 of the written comments are incorrect. The appeal of the appellant was not decided nor was the decision delivered to the appellant within time. The appeal of the appellant is within time.
4. Paras No.6 of the written comments is incorrect and based on mala fide. The impugned Order is illegal, against law and facts

The appellant has strong cause of action against the respondents. No reason is shown by the replying respondents which shows that the present appellant is not entitled for the promotion.

Reply to grounds:

- A. Grounds A & B of the appeal is correct and reply is submitted by the respondent is wrong, incorrect and against the reality. The replying respondent is misleading the court on different issues which is not involved in the appellant case, hence expressly denied.
- B. Reply to Ground-C is wrong and misleading the cases referred in para is not similar to the appellant case.
- C. Ground-D & E of the appeal are correct and reply is given in the above paras in detail.
- D. Grounds F&G of the appeal are correct. Reply filed by the respondent to these grounds are wrong and incorrect the detail reply is given in the above paras.

IT IS, THEREFORE, MOST HUMBLY PRAYED THAT ON THE ACCEPTANCE OF THE REJOINDER, THIS HON'BLE COURT MAY VERY GRACIOUSLY ALLOWED THE APPEAL IN FAVOUR OF THE APPELLANT AND AGAINST THE RESPONDENTS, WITH ORDER OF SPECIAL COSTS.


 Petitioner
 Through
Asif Ali Shah
 &
Bilal Khan Khalil
 Advocate High Court

Dated: 05.04.2017

Verification:

It is verified upon oath that the contents of this plaint are true and correct to the best of my Knowledge and belief and nothing has been concealed intentionally from the Hon'ble Court.

Executor 

UNIVERSITY OF PESHAWAR



VERIFIED & FOUND CORRECT

DEPUTY CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

(PAKISTAN)

PROVISIONAL CERTIFICATE

SESSION 2001

Examination:- Annual/Supplementary

Certified that Mr/Miss Lal Zaman Shah
son / daughter of Gul Sakhid Shah
and a candidate / student of Charsadda District
has passed the B.A.
Examination held in June 2001
by securing 261 marks out of 550 and has been placed in Second Division

The examination was taken as ~~a whole~~ / in parts.

No 046005

Registration No. 98-PS-24192
Roll No. 99638
Result declared on 5.11.2001

DEPUTY CONTROLLER OF EXAMINATIONS,
UNIVERSITY OF PESHAWAR

DSP
ADMN
CRIMES BRANCH
NWFP PESHAWAR

From:- The Dy. Inspector General of Police,
Crimes Branch, NWFP, Peshawar.

To :- The Inspector General of Police,
N.W.F.P., Peshawar.

No. 3376 / Crimes, dated Peshawar, the 11/11/98.

MEMORANDUM

MEMORANDUM

The services of the following Driver
Head Constable/Constables of DRP/Hqs are required
to this unit :-

- 1- DHC Asimul Abiddin No. 1957.
- 2- HC Saif Zaman Shah No. 2053.
- 3- HC Saif Jawad No. 2057.
- 4- HC Saif Gul No. 2998. / 2908
- 5- DHC Wahemad Zareen No. 2055.

These transfers requests may kindly be transferred to this office on deputation
basis.

(Signature)
(CAHSAN MUHAMMAD USHRAT)

Dy. Inspector General of Police,
Crimes Branch, NWFP, Peshawar.

*Copy sent
to...*

2078

ORDER

The following Lower Subordinates of FRP NWFP are hereby transferred and posted to Crimes Branch on deputation basis with immediate effect :-

- 1) DHO Zaid-ul-Abiddin No.1957
- 2) F.C Lal Zaman Shah No.2053.
- 3) F.C Akbar Jawad No.2057.
- 4) F.C Sahar Gul No.2908.
- 5) D.F.C Mohammed Zareen No.2055

3365

22/8/98

FAQIR HUSSAIN
DIG/HQRS:
FOR INSPECTOR GENERAL OF POLICE
N.W.F.P., PESHAWAR.

No. 3937-28/E-II, Dated Peshawar, the 26/8/1998.

Copy forwarded for information and necessary

action to the :-

- 1) Commandant FRP NWFP, Peshawar.
- 2) DIG of Police, Crime Branch, NWFP, Peshawar, w/r to his Memo: No. 3540/Crimes dated 19.8.98.

(AKBAR HUSSAIN HAIDRI)
REGISTRAR
FOR INSPECTOR GENERAL OF POLICE
N.W.F.P., PESHAWAR.

SHAHID ALI

25.8

Recd 1/10/98

O R D E R

The lien of the following Constables of various Distts./Units as noted against their names are hereby transferred to Crimes Branch, NWFP, Peshawar on permanent basis with immediate effect:-

1. Const: Wakil Khan No. 64 of CPC/Pesh:
2. " Abid Jawad No. 94 of FRP.
3. " Imrail Khan No. 100 of FRP.
- ✓ 4. " Lal Zaman Shah No. 92 of FRP.
5. " Shafi Ullah No. 66 of Pesh: Distt:
6. " Sahibzada Abbas No. 79 of Pesh: Distt:
7. " Said Rahim No. 97 of Charsadda Distt:
8. " Muhammad Naeem No. 101 of Charsadda.
9. " Imrat Ali Shah No. 65 of Peshawar Distt:
10. " Fazal Dad No. 61/OB of Pesh: Distt:

AHSAN MUKHTIAR ASHRAF
DIG/HQRS:
FOR INSPECTOR GENERAL OF POLICE
N.W.F.P., PESHAWAR.

NO.

16329-33

/E-II, dt: Pesh: the 02/10 /2001

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

1. D.I.G of Police, Peshawar Range, Peshawar.
2. Commandant, FRP, NWFP, Peshawar.
3. D.I.G of Police, Crimes Branch, NWFP, Peshawar w/r to his Memo: 3945/CB, dt: 28.9.2001.
4. Sr: Supdt: of Police, Peshawar.
5. Supdt: of Police, Charsadda.


(HALI QUDRAT SHAH)

REGISTRAR
FOR INSPECTOR GENERAL OF POLICE
NWFP, PESHAWAR.

ORDER.

The lien of the following Lower Subordinates of District/Unit noted against their names now serving in investigation wing NWFP Peshawar are hereby transferred to their respective District/Unit with immediate effect. However, they will remain posted in investigation wing NWFP Peshawar.

<u>S.No.</u>	<u>Names.</u>	<u>Parent District.</u>
1.	HQ Mahmood Jamil No. 147	CPC
2.	" Shariullah No. 148	Peshawar.
3.	" Sher Qadir No. 145	-do-
4.	" Mujahid Hussain No. 144	-do-
5.	" Faisal Dad No. 133	-do-
6.	Genst: Lal, Zaman Shah No. 92	-do-
7.	" Hasam Khan No. 98	-do-
8.	" Bakht Jamal No. 3	-do-
9.	" Khalid Waqar No. 82	-do-
10.	" Saif Rahim No. 97	Charsadda
11.	" Mahmood Haseem No. 101	-do-
12.	" Abid Javed No. 94	-do-



(Signature)
(KHURSHID ALAM KHAN)

ADDL: IGP/INQ:
FOR PROVINCIAL POLICE OFFICER,
N.W.F.P., PESHAWAR.

No. 27529-32 /E-II dated Peshawar, the 07/12/2007.
Copy for information and necessary action

- to the:-
1. Addl. Inspector General of Police Investigation NWFP, Peshawar w/r to his Memo: No. 10236/Invest: dated 29.11.2007.
 2. Capital City Police Officer, Peshawar.
 3. Commandant, CPC, Peshawar.
 4. District Police Officer, Charsadda.

OFFICE OF THE ADDL:IGP INVESTIGATION NWFP, PESHAWAR

No. /Inv: dated Peshawar, the 12/2007.

Copy of above is forwarded for information & necessary action to SRC/Investigation, NWFP, Peshawar.

(Signature)
SSP/INV.
For Addl. Inspector General of Police,
Investigation NWFP, Peshawar.
(Signature)
10/12

Cancellation of Lien

12. MISCELLANEOUS PARTICULARS

12. Miscellaneous Particulars.

War Medals and Decorations.—

(NOTE—Enter designation of award and date only.—Gazette Notification in case of Quaid-i-Azam Police Medal and the Pakistan Police Medal. Other special decoration to be entered full under commendatory entries.)

Light duty
Allowed light duty
in medical treatment
of backache
CISN 2355
17/5/85
MMAZ

Recruit course passed at RTC Nowshera during
the term ending 9-6-92 vide RTC Nowshera No. — /
dt. — .

13. Miscellaneous particulars including awards others than those accompanied by commendation certificates moved from promotion lists.
Peshawar Range, Peshawar

[Signature]

Passed A-I Examination held on 15-3-96
vide Dy. Comdr. P.T.C Hanger Memo No. 933-37/1996
dt. 20.2.96.

[Signature]

Name brought in promotion list
B-1 vide R.T.C. Hanger Enrolment
No. 1161/S dt. 10th March, 1992

[Signature]
COMMANDANT
Frontier Range Police
N.W.F.P. Peshawar.

ORDER

On account of his excellent performance of duty Constable Laal Zaman Shah No. 2053/92 of Investigation Unit CPO Peshawar is hereby promoted as Offg: Head Constable BPS-07 (3530-190-9230) with immediate effect and till further orders.

He will draw pay against the post of ASI due to non-availability of vacancy.


(SYED ABDUL WADOOD SHAH)

PSP

Add: Inspector General of Police,
Investigation, K.P.K, Peshawar.

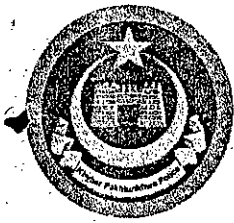
No. 8843-46 /Inv:

22/10/20

On 22/10/2020

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

1. DSP/Admn:/Inv:
2. Accountant Inv:
3. SRC/Inv:
- ✓ 4. SHO PS Inv:



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

No. S/ 1337 /17, dated Peshawar the 08/03/2017.

ORDER

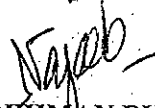
This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by **Constable Ijaz Ali No. 1886 (the then HC)**. The appellant was reverted from the rank of Head Constable to Constable by DPO/Swat vide OB No. 180, dated 20.10.2016 as he was promoted out of turn to the rank of Head Constable on 30.07.2011 in violation of rules / seniority and in excess of quota as envisaged in Rule 13.8 (2) Police Rules 1934.

His appeal was rejected by Regional Police Officer, Malakand, Swat.

Meeting of Appellate Board was held on 09.02.2017. Petitioner present and was heard in detailed. During hearing petitioner contended that he alongwith his father was abducted by the militants during Swat operation and he made good his escape from the clutches of terrorists and took shelter. He also contended that he is receiving threats from Afghanistan. Petitioner further contended that he was promoted in accordance with standing order No. 6/2014 in recognition of performing duty in the insurgency in Swat and his name was brought on list C-II.

Petitioner was promoted on performing duty in the insurgency in Swat and his name was brought on list C-II, therefore, the Board decided that his original rank of Head Constable is hereby restored.

This order is issued with the approval by the Competent Authority.

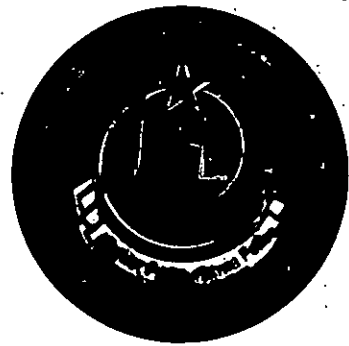

(NAJEEB-UR-REHMAN BUGVI)
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. S/ 1338-45 /17,

Copy of the above is forwarded to the:

1. Regional Police Officer, Malakand at Saidu Sharif, Swat.
2. District Police Officer, Swat.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Khyber Pakhtunkhwa, Peshawar
7. Office Supdt: E-IV CPO Peshawar.
8. Central Registry Cell, CPO.

Khyber Pakhtunkhwa Police



Commendation Certificate

CLASS I

Granted by

Inspector General of Police, Khyber Pakhtunkhwa

To

H.C. Lal Zaman Shah

Son of

District

C.P.O (Invest.)

in Recognition of

Good Performance

Cash P.S. 2000/-

Dated 02 / 12 / 2016

Inspector General of Police

Additional IGP/Headquarters

*Entry made in
the Service Book
1/11/1996
SP/2
1091*



Frontier Province Police

Commendation Certificate

CLASS II

Granted by

AHSAN MUKHTAR ASHRAF
COMMANDANT

FRONTIER RESERVE POLICE NWFP

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P.

To **CONSTABLE LAL ZAMAN SHAH NO. 2053/FRP**

Son of _____

District _____

in Recognition of

GOOD PERFORMANCE.

CASH REWARD RS.100/-

O.B.NO. 857

Dated 5.11.19 96

[Signature]
Deputy Inspector General of Police,
N.W.F.P.

Emphy made in
service Act - A 500
17/12/95

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

MR. SULTAN HANIF ORAKZAI

COMMANDANT

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P.
F.R.P. NWFP

To MR. LAL ZAMAN SHAH NO.2270

Son of

District

in Recognition of

GOOD PERFORMANCE.

With Cash reward Rs.500/-

O.B.NO. 872
Dated7.....12.....19 95

[Signature]
COMMANDANT
Deputy Inspector General of Police,
F.R.P.

N.W.F.P.

Peshawar.

Empty made on
Same date
Annulment 12/95

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

MR. SULTAN HANIF ORAKZAI

COMMANDANT

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P.
F.R.P. NWFP

To MR. LAL ZAMAN SHAH NO. 2270

Son of

District

in Recognition of

GOOD PERFORMANCE

WITH CASH REWARD RS. 450/-

O.B. NO. 476

Dated 10.12.19 95

[Signature]
COMMANDANT
Deputy Inspector General of Police,
F.R.P. N.W.F.P.
Peshawar.

Empty on do
See Roll
N.A. 510 4/96

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

SULTAN HANIF ORAKZAI
COMMANDANT FRP
N.W.F.P.

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P.

To CONSTABLE LAL ZAMAN SHAH NO. 2270

Son of _____

District _____

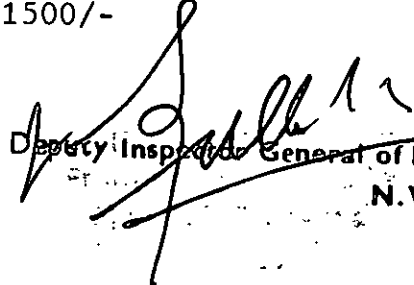
in Recognition of

FOR HIS GOOD PERFORMANCE.

Cash reward Rs.1500/-

OB NO. 11

Dated ...4.1.....1996


Deputy Inspector General of Police,
N.W.F.P.

Entry made
Service NW
MSW 12.14
55

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

Malik Navaed Khan

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P.

COMMANDANT FRONTIER RESERVE, POLICE NWFP PESHAWAR

To Mr. LAL ZAMAN SHAH.

Son of Constable No 2270FRP HQ Peshawar

District Peshawar

in Recognition of

his good Performance with Cash reward of Rs 200.

Dated... 6, 12, 1994 ... 19

A. Malik
Deputy Inspector General of Police,
N.W.F.P.

*Entry made
in the same book
7/11/1997
S/O
10/97*

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by
AHSAN MUKHTAR ASHRAF
COMMANDANT

~~FRONTIER RESERVE POLICE NWFP~~

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P.

To CONSTABLE LAL ZAMAN SHAH NO. 2053/FRP

Son of _____

District _____

in Recognition of

GOOD PERFORMANCE.

CASH REWARD RS.100/-

O.B.NO. 59
Dated...23.1.1997.19

[Signature]
Deputy Inspector General of Police,
N.W.F.P.

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

COMMANDANT, FRONTIER RESERVE POLICE, N.W.F.P, PESHAWAR.

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P.

To CONST: LAL ZAMAN SHAH NO.2053

Son of _____

District FRP/H-Qrs: ,Peshawar.

in Recognition of

his good official duties during the year,1997.

Cash Reward of Rs.100/-

O.B.No.74

Dated 24.1......1998.

Deputy Inspector General of Police,
N.W.F.P.

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

MR. AHSAN MUKHTAR ASHRAF, COMMANDANT, FRP,

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P.

To MR. LAL ZAMAN SHAH, CONSTABLE No.2053

Son of HAJI GUL SAKHID SHAH

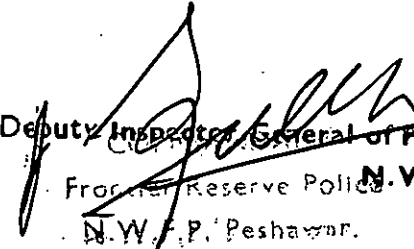
District CHARSADDA

in Recognition of
HIS GOOD OFFICIAL DUTIES.

Cash reward of Rs.100/-

Dated23..6.....19 98

OB No. 454


Deputy Inspector General of Police,
Frontier Reserve Police N.W.F.P.
N.W.F.P. Peshawar.

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

AHSAN MUKHTAR ASHRAF

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P. CRIMES BRANCH

To LAL ZAMAN SHAH NO.92

Son of _____

District CRIMES BRANCH N.W.F.P., PESHAWAR.

in Recognition of

Good work with cash reward

RS. 200/-

O.B.NO.174

Dated 18.11.1999

Deputy Inspector General of Police,
CRIMES BRANCH N.W.F.P. PESHAWAR
Deputy Inspector General
of Police CRIMES BRANCH
N.W.F.P. Peshawar.

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

SULTAN HANIF ORAKZAI.

Dy. Inspector GENERAL OF POLICE N.W.F.P.
CRIMES BRANCH, N.W.F.P., PESHAWAR.

To Lal Zaman Shah No.92

Son of _____

District Peshawar.

In Recognition of

Good work with cash reward

of Rs. 300/-

O.B. NO. 162/C.B.

Dated.....29/9/.....2001

[Signature]
D.I.G. Crimes, NWFP
Peshawar
Dy. Inspector General of Police
C.B. N.W.F.P

Entry made

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

AHSAN MUKHTAR ASHRAF

DEPUTY INSPECTOR GENERAL OF POLICE-N.W.F.P. C.B

To CONSTABLE LAL ZAMAN SHAH. NO. 160.

Son of HAJI GUL SAKHID SHAH.

District PESHAWAR.

in Recognition of
FOR HIS GOOD OFFICAL DUTY.

CASH REWARD RS. 200/-

AHSAN MUKHTAR ASHRAF

Dated 16/ 1/ 1999.

OB.NO. 10-C.B.

Dy;Inspector Genral Of Police,
Crime Branch NWFP. Peshawar.

Encl. 1

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

AHSAN MUKHTAR ASHRAF

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P., C.B., NWFP, PESHAWAR.

To LAL ZAMAN SHAH NO. 2053

Son of HAJI GUL SAHID SHAH.

District CHARSADDA.

in Recognition of


For his good officials duty.

Cash reward Rs. 100/-

O.B.O. NO. 333/C.B.

DATED 24.10.1998.

Dated19 ..


Deputy Inspector General of Police,
CRIMES BRANCH, N.W.F.P.
D.I.G. Crimes, NWFP, PESHAWAR.
Peshawar,

Every name

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

MOHAMMAD TANVIR-UL-HAQ

DEPUTY INSPECTOR GENERAL OF POLICE N.W.F.P. CRIME BRANCH.

To LAL ZAMAN SHAH NO. 92 CRIME BRANCH.

Son of _____

District CRIME BRANCH.


in Recognition of

GOOD WORK WITH CASH REWARD

Rs. 400/-

O.B NO.46 CB

Dated 18.5.2000 19


MOHAMMAD TANVIR-UL-HAQ
Deputy Inspector General of Police,
CRIME BRANCH N.W.F.P. N.W.F.P.
Deputy Inspector Genera
of Police CRIMES BRANCH
NWFP, Peshawar

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

MOHAMMAD TANVIR-UL-HAQ

DEPUTY INSPECTOR GENERAL OF POLICE-N.W.F.P. CRIMES BRANCH.

To CONSTABLE, LAL ZAMAN SHAH. NO.92.

Son of

District CRIMES BRANCH.

in Recognition of
GOOD WORK WITH CASH REWARD.

Rs.500/-

O.R NO.126 CB.

Dated 14.12.2009

Deputy Inspector General of Police,
CRIMES BRANCH N.W.F.P.
D.I.G. Crimes, PESHAWAR,
Peshawar.

North West Frontier Province Police



Commendation Certificate

CLASS II

Granted by

FAQIR HUSSAIN.

Dy. Inspector GENERAL OF POLICE N.W.F.P.
CRIMES BRANCH, N.W.F.P., PESHAWAR.

To LAL ZAMAN SHAH NO.92

Son of _____

District PESHAWAR.

In Recognition of

Good work with cash reward

of Rs.100/-

O.B. NO.274/C.B.

Dated.....13.4.....2002.

[Signature]
D.I.G. Crimes, NWFP
Peshawar.
Dy. Inspector General of Police
C.B. N.W.F.P.

[Handwritten signature]