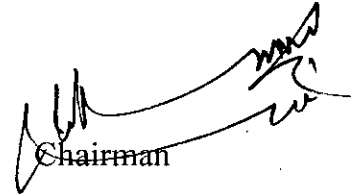


08.1.2018

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

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

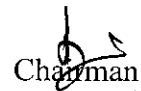

Member


Chairman

ANNOUNCED
08.1.2018

06.04.2017

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


Chairman

31.07.2017

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


(Ahmad Hassan)
Member

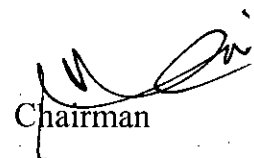

(Muhammad Amin Khan Kundi)
Member

p

29.08.2017

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



Member


Chairman

10.10.2017

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


Member

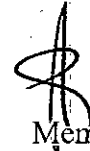

Chairman

08.04.2016

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



Member



Member

01.08.2016

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



MEMBER



MEMBER

uzma

06.12.2016

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



(ASHFAQUE TAJ)
MEMBER



(MUHAMMAD AAMIR NAZIR)
MEMBER

15.12.2014

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



READER

17.2.2015

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



MEMBER

MEMBER

01.06.2015

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



Member



Member

1.4.2014.

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

MEMBER

MEMBER

03.6.2014

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

MEMBER

MEMBER

24.07.2014

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

MEMBER

29.10.2014

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

MEMBER

20.11.2013

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


MEMBER

21.11.2013

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


MEMBER


MEMBER

24.12.2013.

Appellant with counsel and Mr. Muhammad Jan, GP with Hidayat Shah, Inspector (Legal) for the respondents present. Mr. Sultan Mahmood Khattak, learned Member is on leave, therefore, case is adjourned to 6.2.2014 for arguments.


MEMBER

6.2.2014

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


MEMBER


MEMBER

31.01.2013

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

Member

Member

27.03.2013

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

MEMBER,

MEMBER

15.7.2013

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

MEMBER

MEMBER

30.8.2012

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

MEMBER

MEMBER

14.11.2012

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

MEMBER

MEMBER

28.12.2012

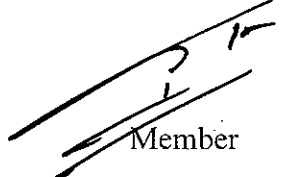
Clerk to counsel for the appellant and AAG with Ijaz Hussain, S.I (Legal) for the respondents present. Representative of the respondents stated that written reply will be submitted on the next date positively. To come up for written reply by way of last chance on 31.1.2013. In case the respondents failed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

MEMBER


MEMBER

7. 30.5.2012

Counsel for the appellant and Mr. Hidayat Shah Inspector legal for the respondents present. Counsel for the appellant heard. Contends that the batch mates as well as junior to the appellant have been confirmed as ASIs and their names have been brought on list "E" vide the impugned order dated 27.9.2011 but the appellant has been ignored without any justification. The appellant is eligible and qualified as per promotion and confirmation criteria. The appellant preferred a departmental appeal but with no response. In support of his arguments regarding limitation the learned counsel for the appellant referred to 2005-PLC-CS-1475. Points raised need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter notice be issued to the respondents. Case adjourned to 30.8.2012 for submission of written reply.


Member

8. 30.5.2012

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


Chairman

Zardad Alica & others

5. 21.3.2012.

Counsel for the appellant present.
An order to ascertain true facts of the facts including seniority of the appellant, Pre-admission notice be given to the AAG/ Respondents. To come up for P.H. along with all relevant records on 24-4-2012.



Member

6. 24-4-2012.

Counsel for appellant present. Mr. Hidayatullah Inspector legal on behalf of respondents present, and request for adjournment. To come up for written reply / P.H. on

30-5-2012.



Member

Form- A
FORM OF ORDER SHEET

Court of -----

Case No. 214/2012

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

The appeal of Mr. Safdar Ali 270 Nowshera received to-day i.e. on 10/02/2012 is incomplete on the following scores which is returned to the counsel for the appellant for completion and re-submission within 15 days:-

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

NO. 152 /S.T,

Dt. 11/02 /2012.

[Signature]
REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

MR. ASHRAF ALI KHATTAK ADV.

Suz, Re-submitted after completion.

[Signature]
16/02/12

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 214 / 2012

Sajdar Ali NSR
Special branch, Nowshera.

.....Appellant

Versus

The Provincial Police
Officer and others.

.....Respondents

INDEX

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

Through Appellant

Ashraf Ali Khattak

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

Dated: _____ / 02/ 2012

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL No. 214/2012

Sayful Ali (270), NSR Special Branch Nowshera (Appellant)

Handwritten notes and stamps including '196' and 'dated 10/02/12'.

Versus

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

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

PRAYER:

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

Filed to day 10/2/12

re-submitted to day and filed, 16/2/12

Respectfully Sheweth:

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

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

5. That in order to resolve the seniority position of the police officials belonging to District Nowshera with that of Police officials belonging to District Peshawar high level committee was constituted who considered and scrutinized the matter in there meeting held on 16/07/2009 and decided:- (Annexure "B").
"according to Police Rule 13.8 and 13.9 seniority list "C" and "D" are to be maintaining the districts where list "E" is maintain by the by the region, therefore the officer on the strength of Mardan Region who are willing for transfer to CCP Peshawar may up for their permanent transfer maintaining the districts Peshawar, Charsadda and Nowshera. There seniority in the district will be fixed in accordance with the merit list published by P.T.C in there respective rank with their colleagues in the district. Moreover in case of officiating SI their seniority will be fixed from the date of there confirmation as ASIs and admission to list "E" in the district opted".
6. That as per bonifide in knowledge of the appellant no such seniority list has been issued and maintained by the concerned office in respect of the officiating ASIs of the Nowshera District.
7. That as per rules the respondent No. 2 was under legal obligations to consider all the districts officiating ASIs for conformation purposes belonging to the whole regions under his control and supervision, but respondent No. 2 inspite of considering officiating ASIs of the whole region

considered only officiating ASIs belonging to Peshawar Districts only for conformation and promotion to list "E" which is sheer discrimination with appellant and others officiating ASIs belonging to Nowshera District. Moreover batch mate as well as junior to him have been confirmed as ASIs and their name has been brought on promotion list "E" vide impugned order dated 27/09/2011. (Annexure "C"). Incumbents at serial No. **62** to **67** of the impugned notification are the batch mate of the appellant while rest till serial No. 298 are junior to the appellant.

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

Grounds:

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

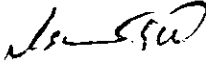
belonging to Nowshera District have been violated. On this core as well the impugned order is not maintainable in the eyes of law and therefore liable to be set aside.

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

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

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


Appellant

Through 

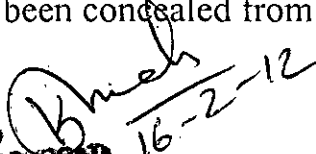
Ashraf Ali Khattak
Advocate, Peshawar.

Dated: _____ / 02/ 2012

AFFIDAVIT

I, Safdar Ali no. 270 NSR Special Branch Nowshera, do hereby solemnly affirm and declare on oath that the contents of this Service Appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.


DEPONENT


ATTESTED
MALIK NAHSOOD ADVOCATE
OATH COMMISSIONER
PESHAWAR HIGH COURT
16-2-12

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

SERVICE APPEAL. No. _____ 2012

Safdar Ali No-270 NSR Special Branch Nowshera
.....(Appellant)

Versus

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

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

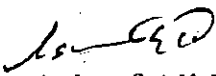
Respectfully Sheweth:

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

loss.

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

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

Applicant
Through 
Ashraf Ali Khattak,
Advocate, Peshawar.

Dated: 10 _____ / 02/ 2012

Affidavit

I, Safdar Ali no. 270 NSR Special Branch Nowshera, do hereby affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

ATTESTED
HALID MAHMOOD ADVOCATE
OATH COMMISSIONER
PESHAWAR HIGH COURT


16-2-12
DEPONENT

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

NOTIFICATION.

Dated Peshawar the 25/11/2009.

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

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

Attested
To be true copy
Advocate

21/12

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

10

Attested
To be true copy
Advocate

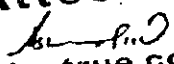
	Muhammad Riaz 2427/1071 CHD PS Tangi/Inv:		
60.	Tilawat Shah 904 CHD MHC Tangi		
61.	Akhtar Ali 518/NSR Special Branch	✓	SB
62.	Munir Khan 390/CHD MIIC PS Prang.		
63.	Sami Ullah 655/CHD MHC PS Umarzai		
64.	Haji Muhammad 355/NSR Nowshera	✓	ATC
65.	Amjid Ali 339/CHD PS Mandani		
66.	Muhammad Ibrar 127/CHD Police Line		
67.	Fazal Elahi 895/NSR Special Branch	✓	SB
68.	Salceem Khan 743/888/NSR Nowshera	✓	الزمری
69.	Hasan Gul 587/CHD Reader DSP/HQrs		
70.	Silver Khan 401/CHD PS Shabqadar		
71.	Muhammad Alam 411/NSR Nowshera	✓	الزمری
72.	Azghar Khan 751/CHD Traffic Staff		
73.	Habib Ullah 140/CHD On deputation to Motor Way		
74.	Muhammad Tabrez 636/NSR Nowshera	✓	اسپر DSP الزمری
75.	Sujaat Khan 918/CHD PS Sar Dheri		
76.	Sher Muhammad 477/NSR Nowshera	✓	الزمری
77.	Ihsan Ullah 65/CHD I/C Lower Court Charsadda.		
78.	Murad Ali 72/78/CHD PS Umarzai/Inv:		
79.	Ghafar Ali 862/CHD PS Prang/Inv:		
80.	Wajid Ali No.304 (PS University Town Inv:)		Peshawar
81.	Fayaz Muhammad 994/NSR Nowshera	✓	الزمری
82.	Nasar Ullah 924/CHD Police Line Charsadda.		
83.	Masood Khan 755/CHD MIIC PS Nisatta		
84.	Said Umar 919/CHD MHC PS Tarnab		
85.	Fazal Badsha 305 CHD PS Sar Dher/Inv:		
86.	Farid Shah 401/CHD PS Umarzai.		
87.	Iftikhar Hussain 579/NSR Nowshera	✓	ڈی. اے. ہیر
88.	Muhammad Ibraheem 340/NSR Nowshera	✓	ایجاد 13.1.2009
89.	Humayun 3/CHD PS Umarzai/Inv:		
90.	Maqbool Jehan Inv: Wing Peshawar		
91.	Khizar Hayat PS Pishtakhara		Peshawar
92.	Mumtaz Khan 1470 PS University-Town		Peshawar
93.	Anwar Jan No.90 (ATS Squad)		Peshawar

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	Riaz Ali Shah 3976 On deputation to PTC Hangu.	
	Hidayat Khan 3955 PS Badaber.	Peshawar
96.	Tehseen Ullah 458 CHD PS Sardheri	
97.	Amir Muhammad 3915 Reader SSP/Coord: Peshawar	
98.	Jamhar ud Din 3535 PS Pishtakhara	Peshawar
99.	Halqem Gul 3887 PS Pharipura	Peshawar
100.	Fazal Ruban 2084 MHC PS Regi	Peshawar
101.	Asad Khan 24 Traffic Peshawar	
102.	Jehanzaib 151/4021 Traffic Staff Peshawar	
103.	Sabir Ullah 3911 PS Miachni Gate Inv:	Peshawar
104.	Muhammad Israr ud Din 727 Reader DSP Chamkani	Peshawar
105.	Ijaz Khan 890 PS Miachni Gate	Peshawar
106.	Zahid Hussain 131 PS Pharipura Inv:	Peshawar
107.	Abdullah Jan 2512 PS E/Cantt:	Peshawar
108.	Waqif Khan 4072 PS Pishakhara	Peshawar
109.	Guldad Khan 37 On loan to PTC Hangu.	
110.	Zahid Ullah 475/ CHD PS Charsadda	
111.	Latif ur Rehman 496 Secretariat Peshawar	Peshawar
112.	Muhammad Iqbal 1972 OASI Branch	Peshawar
113.	Muhammad Gul 342/2761 Special Branch	
114.	Sartaj 3669 On loan to Elite force	Peshawar
115.	Ghulam Hussain 331/3433 Special Branch	
116.	Humayun Khan 549/372/1802 Traffic Staff Peshawar	
117.	Fida Muhammad 1097 PS Phandu	Peshawar
118.	Subhan Ullah 3259/Chd: (Traffic Police Peshawar)	
119.	Shaukat Kamal 3421 PS Pharipura	Peshawar
120.	Khalid Khan 4078 PS Hashtnagri	Peshawar
121.	Hamid 46 PS Urmar	Peshawar
122.	Sartaj Khan 3633 PS Mathra	Peshawar
123.	Wasif-ur-Rehman 3977 PS Hayat Abad	Peshawar
124.	Sardar Hussain 798 Police Line Nowshera.	
125.	Farid Khan 3575 PS E/Cantt:	Peshawar
126.	Tehseen Ullah 3733 PS Kotwali	Peshawar
127.	Yasin Gul 1888 Motor Way Police	
128.	Atta Ullah 3348 Reader SSP/Operation	Peshawar

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

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

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

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

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

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Advocate

**CAPITAL CITY POLICE OFFICER,
PESHAWAR.**

No. 16538-57/EC-I,

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

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

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

**CAPITAL CITY POLICE OFFICER,
PESHAWAR.**

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

16
v. *Arif B*

From The Provincial Police Officer,
NWFP, Peshawar.

To The Capital City Police Officer,
Peshawar.

EC

For reaction's

The Deputy Inspector General of Police,
Mardan Region

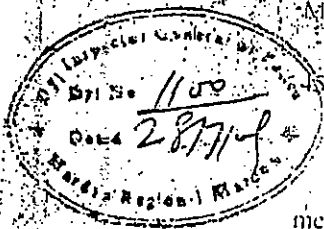
Report

No. *18564-65* dated Peshawar the *23.7* /2009.

*D/O/MSD
30/7*

Subject: TRANSFER OF LIEN / FIXATION OF SENIORITY

Memo: Please refer to your Memo No. 922/ES dated: 21.03.2009 and No. 4594/EC-1 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 ~~for~~ transfer to CCP Peshawar may opt for their permanent transfer mentioning the district i.e. Peshawar, Charsadda and Nowshera. Their seniority in the district will be fixed in accordance with the merit list published by PTC in their respective rank with their colleagues in the district. Moreover in case of officiating SI their seniority will be fixed from the date of their confirmation as ASI and admission to list E in the District opted.
- 2) In order to facilitate the officials, two options for transfer to either districts would be required i.e. 1st and second option. If the vacancy is not available in the district opted for second option for other district will be considered for their transfer etc.
- 3) No lien shall be retained by the officials and transfer of the officials shall be on permanent basis.
- 4) The official from the parent district will be given preference for the transfer according to availability of seats.

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

*5464
31-7-09*

*EC
Final order
off upon
Mugher
D/O/MSD*

(MIAN KHURSHID ANWAR)
AIG/Legal
For Provincial Police Officer,
NWFP, Peshawar.
No. *2238-3P* /ES dated *29/7/2009*

copy to D/O Nowshera and Charsadda. The requisite option may be obtained from the concerned police personnel and submitted to the parent district under reference to the file.

Attested
[Signature]
To be true copy
Advocate

6/7/09

POLICE DEPARTMENT

CAPITAL CITY POLICE PESHAWAR

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

NOTIFICATION

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

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

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

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

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

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170	Muhammad Anwar 3152	ASI	978/P	CCP Peshawar
171	Jan Muhamamd 2917	ASI	979/P	Traffic KPK
172	Inayat Ullah 129	ASI	980/P	CCP Peshawar
173	Abdul Rauf 3112/FRP	ASI	981/P	Traffic
174	Mohib Gul 3116	ASI	982/P	CCP Peshawar
175	Khursid 191/CHD	ASI	983/P	Charsadda
176	Razi Khan 3828	ASI	984/P	CCP Peshawar
177	Muhammad Akram 234	ASI	985/P	CCP Peshawar
178	Muhammad Riaz 107/CPC	ASI	986/P	Traffic
179	Farhad Hussain 3419	ASI	987/P	Traffic
180	Sawal Faqir 929	ASI	988/P	Traffic
181	Sana Ullah 27	ASI	1/P	CCP Peshawar
182	Yousaf Khan No. 64	ASI	989/P	CCP Peshawar
183	Riaz Ahmed 2354	ASI	990/P	CCP Peshawar
184	Haider Raza 315/CPC	ASI	991/P	CCP Peshawar
185	Zahoor Rehman 3137	(S. ACB)	992/P	CCP Peshawar
186	Roze Amin 4476	ASI	993/P	CCP Peshawar
187	Noor ul Hadi 2688	ASI	994/P	Traffic
188	Faqir Hussain 2879	ASI	995/P	Traffic
189	Dil Faraz 4477	ASI	996/P	CCP Peshawar
190	Zafar Ali 1391	ASI	997/P	CCP Peshawar
191	Muhammad Ibrahim 2115	ASI	998/P	CCP Peshawar
192	Tilawat Khan 2844	ASI	999/P	CCP Peshawar
193	Fahim Ullah 179	ASI	1000/P	Traffic
194	Zahir Shah 1171	ASI	1001/P	CCP Peshawar
195	Khalil ur Rehman 1693	ASI	1002/P	CCP Peshawar
196	Sardar Hussain 109	ASI	1003/P	CCP Peshawar
197	Sher Rehman 1011	ASI	1004/P	CCP Peshawar
198	Ali Bahadar 4443	ASI	1005/P	CCP Peshawar
199	Qaimat Gul 1264	ASI	1006/P	CCP Peshawar
200	Fazle Khaliq 2560	ASI	1007/P	CCP Peshawar
201	Wali Zada 2755	ASI	1008/P	Traffic
202	S.Rokhan Shah 9/CPC	ASI	1009/P	Traffic
203	Shamsher Ali 3595	ASI	1010/P	Traffic
204	Muhamamd Israr No. 3583	ASI	1011/P	CCP Peshawar
205	S. Kamal Shah 384	ASI	1012/P	CCP Peshawar
206	Ali Hussain 211/CPC	ASI	1013/P	Elite Force
207	Behram Gul 2016	ASI	1014/P	CCP Peshawar
208	Sufaid Gul 471	ASI	1015/P	Traffic
209	Ghulam Ali 3715/1969	ASI	1016/P	Special Branch
210	Diyar Khan 3465	ASI	1017/P	Traffic
211	Said Malik 29/CPC	ASI	1018/P	CCP Peshawar
212	Ahmad Jamal 124	ASI	1019/P	Traffic
213	Muhammad Tahir 3700	ASI	1020/P	Traffic
214	Khushal Khan 52	ASI	06/P	CCP Peshawar
215	Masal Khan 789	ASI	1021/P	CCP Peshawar
216	Misri Gul 99	ASI	1022/P	Traffic
217	Fazal Rahim 896	ASI	1023/P	CCP Peshawar
218	Shah Rasool 4142	ASI	1024/P	CCP Peshawar
219	Himayat Ullah 2762	ASI	1025/P	Traffic KPK
220	Abdul Hamid 2288	ASI	1026/P	Traffic
221	Muhammad Bashir 3284	ASI	1027/P	Traffic
222	Hassan Khan 3327	ASI	1028/P	CCP Peshawar
223	Fazal Mabood 2659	ASI	1029/P	Traffic
224	Nisar Ahmed 123/CPC	ASI	1030/P	Traffic
225	Abid Rasheed No. 279	ASI	1031/P	Spl Branch
226	Bakht Diyan 998	ASI	1032/P	CCP Peshawar
227	Burhan ud Din 1358	ASI	1033/P	CCP Peshawar
228	Muhammad Sabir 178	ASI	1034/P	CCP Peshawar
229	Inam Ullah 725	ASI	1035/P	Traffic
230	Hassan Gul 3404	ASI	1036/P	CCP Peshawar
231	Khalid ur Rehman 4095	ASI	1037/P	CCP Peshawar
232	Ghulam Haider 2715	ASI	1038/P	Traffic
233	Waqar Haider 3106	ASI	1039/P	Special Branch
234	Hassan Zamir 2196	ASI	1040/P	CCP Peshawar
235	Rooh ul Amin 3692	ASI	1041/P	Traffic
236	Murad Ali 2973	ASI	1042/P	Traffic
237	Ikram Ullah 2485	ASI	1043/P	CCP Peshawar
238	Akbar Khan 1919	ASI	1044/P	Special Branch
239	Sabir Ali 1144	ASI	1045/P	

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240	Ihsan Shah 88/CPC	(SI ACB)	6/P	Charsadda District
241	Muhammad Ibrahim 1135	ASI	1046/P	CCP Peshawar
242	Islam Shah 2812	ASI	1047/P	CCP Peshawar
243	Fazal Rabbi 4464	ASI	1048/P	CCP Peshawar
244	Faizullah 3875	ASI	1049/P	CCP Peshawar
245	Ikhtiar Ali 24	ASI	1050/P	Inv. KPK
246	Alam Zeb 660/GPC	ASI	1051/P	CPC
247	Muhammad Ayaz 2573	ASI	1052/P	Traffic
248	Gulnawaz Khan 32	ASI	1053/P	DSP/Legal Branch
249	Nasrullah 1216	ASI	1054/P	CCP Peshawar
250	Mian Mohib Jan 539	ASI	1055/P	CCP Peshawar
251	Ifikhar, 3169	ASI	1056/P	CCP Peshawar
252	Nasrullah 307/CPC	ASI	1057/P	Traffic
253	Jehanzeb 541	ASI	1058/P	CCP Peshawar
254	Shad Muhammad 581	ASI	1059/P	CCP Peshawar
255	Khushal Khan 3513	ASI	1060/P	CCP Peshawar
256	Noor Haider 1163	ASI	1061/P	CCP Peshawar
257	Muhammad Zeb 636/336	ASI	1062/P	CCP Peshawar
258	Hidayat Ullah 1806	ASI	1063/P	CCP Peshawar
259	Hafeez ur Rehman 177/CPC	ASI	1064/P	Traffic
260	Niaz Ullah 3366	ASI	1065/P	Traffic
261	Muhammad Ishrat Yar 2334	ASI	1066/P	CCP Peshawar
262	Syed Zaman 42	ASI	1067/P	Traffic
263	Abdul Wali 6/CPC	ASI	1068/P	Traffic
264	Muhamamd Nawaz 2151	ASI	1069/P	Traffic
265	Hidayat Ullah 2137	ASI	1070/P	CCP Peshawar
266	Amir Nawab 242/CPC	ASI	1071/P	Traffic
267	Muhammad Riaz 809	ASI	1072/P	Traffic
268	Ghafir Ullah 691/CHD	ASI	1073/P	Traffic
269	Farrukh Zada 1225	ASI	1074/P	CCP Peshawar
270	Sabz Ali 886	ASI	1075/P	CCP Peshawar
271	Syed Abid Shah 2333	ASI	1076/P	Traffic
272	Asmat Ullah 1034	ASI	1077/P	CCP Peshawar
273	Saeed Ullah 471/3555	ASI	1078/P	Traffic
274	Muhammad Ali 1029	ASI	1079/P	Traffic
275	Shahjee Hussain 896	ASI	1080/P	Sp.Branch
276	Sabir Shah 1606/707	ASI	1081/P	Traffic
277	Fida Muhammad 1104	ASI	1082/P	CCP Peshawar
278	Ahmed Gul 3417	ASI	1083/P	CCP Peshawar
279	Umer Shah 1619	ASI	1084/P	CCP Peshawar
280	S. Sardar Ali Shah 3109	ASI	1085/P	CCP Peshawar
281	Akhtar Hussain 3745	ASI	1086/P	CCP Peshawar
282	Dawood Jan 842	ASI	1087/P	CCP Peshawar
283	Qayyum Khan 65/CPC	ASI	1088/P	CCP Peshawar
284	Waris Khan 1037	ASI	1089/P	CCP Peshawar
285	Sehat Ali 1602	ASI	1090/P	Traffic
286	Muhamamd Rehan 1943	ASI	1091/P	Special Branch
287	Muzamil Khan.No. 1015	ASI	1092/P	CCP Peshawar
288	M.Arif 3543	ASI	1093/P	CCP Peshawar
289	Sahib Gul 161/CPC	ASI	1094/P	Traffic
290	Muhammad Jan 1049	ASI	1095/P	CCP Peshawar
291	Atta-ur-Rehman 2366	ASI	1096/P	CCP Peshawar
292	Feroze Shah 2174	ASI	1097/P	CCP Peshawar
293	Zain Ullah 3396	ASI	1098/P	CCP Peshawar
294	Nasrullah 1126	ASI	1099/P	INV KPK NAB.
295	Inayat ur Rehman 141/CPC	ASI	1100/P	CPC
296	Waris Khan 314	ASI	1102/P	CCP Peshawar
297	Abdur Rehman 132/CPC	ASI	1103/P	CPC
298	Asmat Ullah No.120/PTC	ASI	1104/P	CCP Peshawar

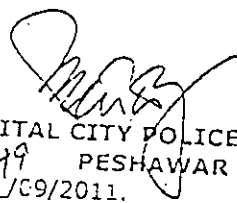
Officiating ASIs/Sis on acting charge basis at serial No.4,7,8,9,10,15,20,21,27,29,31,32,33,35,43,47,48,53,54,56,58,59,60,64,67,68,73,76, 84,87, 91,92,100,101,104,107,120,138,146,152,173,179,186,197,198,199,201,204,207, 214,221,224, 228,231,234,236,237,239,244,250,252,257,262,265,276,278,288,290,295,296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

Attested
[Signature]
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Advocate

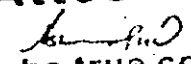
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The following officiating ASIs are deferred due to the reason mentioned against their names.

1	Anwar Ali No. 950/NSR SI ACB	Nowshera	Deferred from confirmation in the rank of ASI; and promotion to List "E" due to "C" report for the year 2010.
2	ASI Karam Elahi No. 9248/FRP	CCP Peshawar	Deferred from confirmation in the rank of ASI and promotion to List "E" due to promotion with held for three years by PPO KPK No. 11839/E-II, dated 04.05.2010 and also under enquiry.
3	Abbas Ali 1642 SI ACB	CCP Peshawar	Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence and incomplete ACR - 2010.
4	Munawar Khan 3043 SIA ACB	Traffic	Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence / incomplete ACRs - 2008, 2009 and 2010.
5	Ejaz Ahmed SI ACB	Traffic	Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence/incomplete ACRs - 2006, 2008, 2009 & 2010.
6	Maqsood Ahmed 1946 SI ACB	CCP Peshawar	Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence incomplete ACR-2010.
7	Dawa Noor No. 1554 SI ACB	Traffic	Deferred from confirmation in the rank of ASI and promotion to List "E" due to absence/incomplete ACRs-2008 & 2009.
8	Khalid Khan No. 2381 SI ACB	Traffic	Deferred from confirmation in the rank of ASI and due to absence/incomplete ACR-2009 & 2010.
9	Muhamamd Sher 1561	CCP Peshawar	Deferred from confirmation in the rank of ASI, promotion to List "E" due to time scale for 03-years by SSP/Operation; Peshawar vide O.B.No. 710, dated 24.02.2011.
10	Qasro Khan No. 1382	CCP Peshawar	Deferred from confirmation in the rank of ASI, promotion to List "E" due to facing departmental enquiry and also absence from DPC/missing ACR-2006.
11	Mukamil Shah No. 3035	CCP Peshawar	Deferred from confirmation in the rank of ASI, promotion to List "E" due to incomplete ACRs for the 2008, 2009 & 2010 and absence from DPC.


 CAPITAL CITY POLICE OFFICER
 PESHAWAR
 27/09/2011

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

Attested

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Advocate

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Amir D: 3
2 (23)

From: The Capital City Police Officer,
Peshawar.

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

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

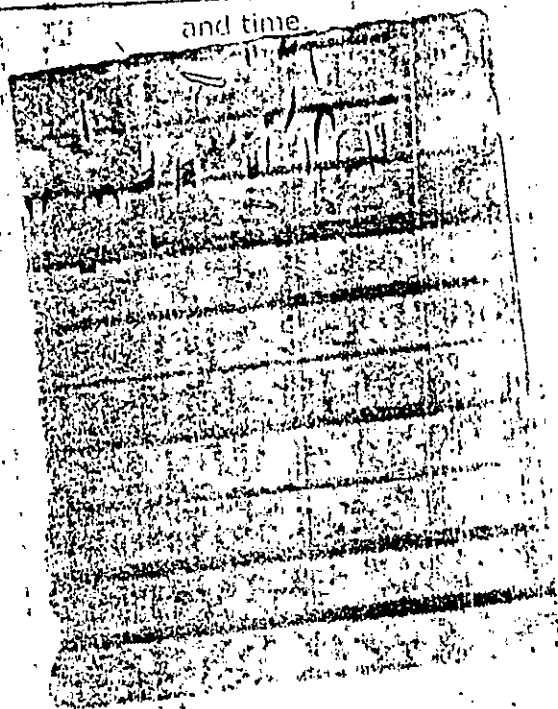
Subject: DEPARTMENTAL PROMOTION COMMITTEE MEET.

Memo:

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

You are requested to attend the said meeting on due date

and time.



Amir D
FOR CAPITAL CITY POLICE OFFICER,
PESHAWAR.

Attested
Amir D
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Advocate

(Most Immediate)

From:- The Capital City Police Officer,
Peshawar.

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

No. 1997-2013/EC-I; dated Peshawar the, 6/2/2012.

Subject: PROMOTION TO THE RANK OF OFFG:SI.

Memo:

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

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

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

Dated 06-07-2012 CC 1

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

Jami
FOR CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No. 7-014 /EC-1

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

Attested
[Signature]
To be true copy
Advocate

27
جناب عالی!

گزارش ہے کہ مسائل کا تعلق لو شہرہ ڈسٹرکٹ سے ہے۔ سال 2008 میں صوبائی حکومت نے ضلع ہزاروان ریجن سے علیحدہ کر کے CCP

پشاور کیساتھ رائج کیا سینیاریٹی کے مسئلہ پر جناب PPO صاحب KPK پشاور نے ایک بورڈ قائم کی جنہوں نے بحوالہ میمو نمبر 922/ES

مورخہ 21-03-2009 کو یہ فیصلہ کیا کہ ضلع ہزارا کے جن پولیس آفسران نے CCP پشاور کے ساتھ لی ان اختیار کی ہے۔ ان کو CCP پشاور میں PTC

ہٹانے کے رزلٹ کے مطابق سینیاریٹی دی جائے گی۔ ہٹا رہا پروموشن بحوالہ نوٹیفیکیشن نمبر 1-16537/EC مورخہ 26-11-2009 بحیثیت ASI:Offg

چکا ہے۔ اب CCPO صاحب پشاور نے بحوالہ نوٹیفیکیشن نمبر 1-15183/EC مورخہ 27-09-2011 کو صرف CCP پشاور کے ASIs کی

کنفریشن کر کے اور (E) لسٹ میں پروموز کئے ہیں جبکہ ضلع لو شہرہ اور چار سمدہ پولیس کو نظر انداز کئے ہیں۔ جو کہ ان دونوں اضلاع کے پولیس کے ساتھ

پروموشن کے سلسلہ میں نا انصافی ہے۔

بذریعہ درخواست استرعا ہے کہ جناب IGP صاحب کے نوٹیفیکیشن نمبر 922/ES مورخہ 21-03-2009 کو رد نظر رکھتے ہوئے مسائل کو

PTC ہٹانے کے مطابق سینیاریٹی دے کر لسٹ (E) میں پروموشن دینے کا حکم صادر فرما کر منگور فرمایا جائے۔ تا حیات دعا گو ہیں گے۔ (نوٹیفیکیشن نمبر

1-16537/EC مورخہ 26-11-2009 اور نوٹیفیکیشن نمبر 1-15183/EC مورخہ 27-09-2011) مراد لاف ہیں

محمد علی
سین نوادش ہوگی

العارض

محمد علی
Asi، 270

Attested
To be true copy
Advocate

27

جناب عالی!

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

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

میں نوازش ہوگی

العارض

1. زردا علی نمبر 525/ASI ضلع نو شہرہ
2. محمد عالم نمبر 411/ASI
3. محمد تمیز نمبر 636/ASI
4. شیر محمد نمبر 477/ASI
5. فیاض محمد نمبر 494/ASI
6. جمشید نمبر 46/ASI
7. محمد نعیم نمبر 57/ASI
8. بہادر شیر نمبر 118/ASI
9. اختر حسین نمبر 579/ASI
10. صفدر علی نمبر 270/ASI

Attest
To be true copy
Advocate

From:-

The District Police Officer,
Nowshera.

To:-

The Capital City Police Officer,
Peshawar.

No.

8931

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

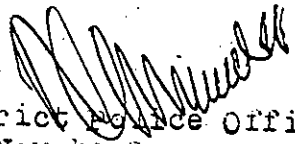
Subject:


APPLICATION FOR THE GRANT OF SENIORITY.

MEMO:

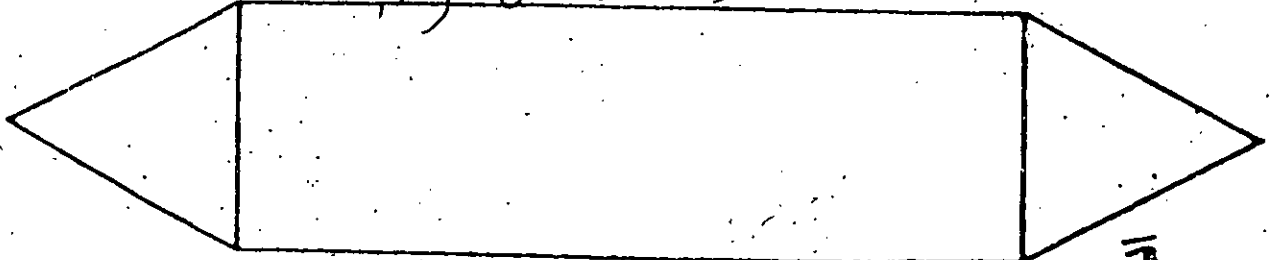
enclosed kindly find herewith an joint application alongwith connected documents submitted by ASIs of this District Police for the grant of seniority according to the instruction/Direction issued vide FPO, NWFP, Peshawar Office memo: No. 18564-65/E-II, dated 23.7.2009 with their colleagues for further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

Incl: as above.


District Police Officer,
Nowshera.

Attested

To be true copy
Advocate

بعدالت سردار گل خان



محمد امجد علی صاحب امر

کلمہ علی بنام ۱۱۰۵ دیوبند

مورثہ
مقدمہ
دعویٰ
جزم

باعث تحریر آئیکہ

مقدمہ مذکورہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دیہی وکیل
کارروائی متعلقہ آن مقام کے لئے اسٹریٹ علی علیہ السلام کے لئے
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز
دیکل صاحب کو کرنے راضی نامہ و تقررات و فیصلہ بر حلف دیے جواب دیہی اور اقبال دعویٰ اور
بصورت دگری کرنے اجراء اور وصولی چیک زر پیسہ اور عرضی دعویٰ اور درخواست ہزیم کی تصدیق
نہر اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت ہم پیروی یا دگری یکطرفہ یا اسل کی برآمدگی اور سوغی
نیز دائر کرنے اسل ٹکرائی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تفرز کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھس دیہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
پیداختہ منظور و قبول ہوگا۔ و دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سبب سے ہوگا۔
اسکے مستحق دیکل صاحب موصوف ہوں گے۔ نیز تقیاد خرچہ کی ذمہ داری کرنے کا بھی اختیار ہوگا۔ اگر
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو دیکل صاحب پابند نہ ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا کات نامہ کھدیا کہ سند رہے۔

المزوم

۱۱۰۵

ماہ

درائشہ

محمد امجد علی صاحب امر

الکر رہے کے لئے منظور ہے۔

بقام

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 214/2012

Safdar Ali No. 270
District Nowshera

.....Appellant

*V*ersus

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

.....Respondents

PARAWISE REPLY ON BEHALF OF RESPONDENTS

Respectfully Sheweth: -

PRELIMINARY OBJECTIONS

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

On Facts

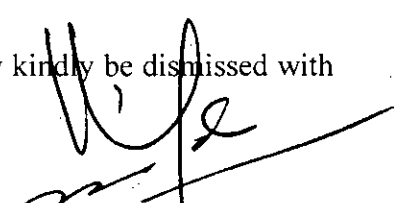
1. Relates to record.
2. Correct.
3. Correct.
4. Correct to the extent of issuing/maintaining seniority list of ASIs by the Regional Police Office, however, the issuance of the said list is under process.
5. Correct to the extent of meeting of the DPC on 16-07-2009 and its decision which is annexed as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

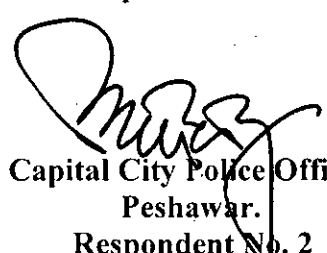
8. Correct. However, it is worth mentioning that these incumbents were promoted to the rank of offg: ASIs before the appellant was promoted to the said rank.
9. Incorrect and denied. Joint application of the appellant as well as his other colleagues was submitted before the Capital City Police Officer,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

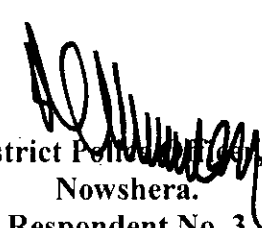
On grounds

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

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


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


**Capital City Police Officer,
Peshawar.
Respondent No. 2**


**District Police Officer,
Nowshera.
Respondent No. 3**

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 214/2012

Safdar Ali No. 270
District Nowshera

.....Appellant

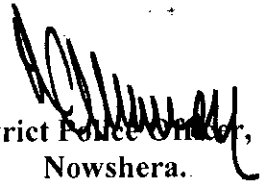
Versus


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

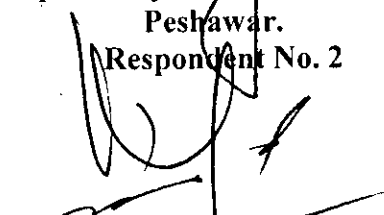
.....Respondents

AFFIDAVIT

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


District Police Officer,
Nowshera.
Respondent No. 3


Capital City Police Officer,
Peshawar.
Respondent No. 2


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

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 214/2012

Safdar Ali No. 270
District Nowshera

.....Appellant

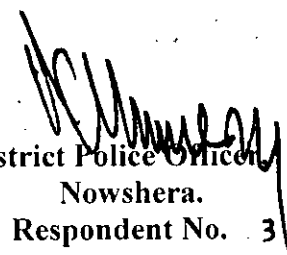
*V*ersus

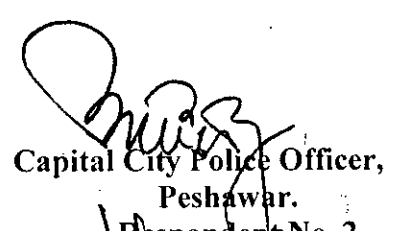
1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar.
3. District Police Officer, Nowshera.

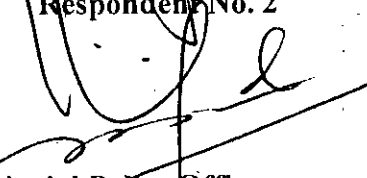
.....Respondents

AUTHORITY LETTER

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


District Police Officer
Nowshera.
Respondent No. 3


Capital City Police Officer,
Peshawar.
Respondent No. 2


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

"A"

R/Sir,

1. Vide PUC placed opposite the DPO Nowshera has forwarded a joint application of 14 offg: ASIs addressed to CPO requesting therein for their confirmation and promotion to list "E" as junior to them have been confirmed and promoted to list "E".
2. In this context office submits that they "alongwith their other 92 colleagues were transferred with lien from Mardan Region to CCP, Peshawar as IHCs vide CPO order issued on 04-08-2009 with the direction to place their names in the seniority list of IHCs in CCP, Peshawar according to PTC result/Merit of Intermediate College Course. Accordingly their names were placed with their colleagues of CCP, Peshawar as per PTC result/Merit List of IHCs.
3. Since the applicants were received as IHCs, therefore, their names were placed with their colleagues of the same terms at Peshawar district but before the transfer of lien of the applicants alongwith other 92 IHCs of Mardan Region, the IHCs of Peshawar District were already promoted as offg: ASIs during the year 2008 against the available vacancies of Peshawar District.
4. On the availability of vacancies during the year 2009, all the 92 IHCs of Mardan Region including applicants were promoted as offg: ASIs on 26-11-2009 in CCP, Peshawar.
5. As explained in para 03 above, IHCs of Peshawar District who were promoted as offg: ASIs during the year 2008 before the transfer of lien of applicants become senior to them thus they have no right to claim seniority with their colleagues of Peshawar district."
6. May forward their joint application to CPO OR inform DPO Nowshera accordingly please.

Submitted for perusal/order please.

EC-I/13

5/13 submitted to orders Pl. AP 3/3/09

EC-I Speake

SSP/COORDINATION. Good note

7. Para 1-5, Reply to DPO Nowshera according.

5/3/09
BTS

17 B 11

From:- The Capital City Police Officer,
Peshawar.

To :- The District Police Officer,
Nowshera.

No. 4256 /EC-I, dated Peshawar the, 12 / 3 /2012.

Subject: APPLICATION FOR THE GRANT OF SENIORITY.
Memo:

Please refer to your office memo: No. 478/EC, dated
16-02-2012.

2. The applicant, along with their other 92 colleagues were transferred with lien from Mardan Region to CCP, Peshawar as IHCs vide CPO order issued on 04-08-2009 with the direction to place their names in the seniority list of IHCs in CCP, Peshawar according to PTC result/Merit of Intermediate College Course. Accordingly their names were placed with their colleagues of CCP, Peshawar as per PTC result/merit List of IHCs.

3. Since the applicant were received as IHCs, therefore, their names were placed with their colleagues of the same terms at Peshawar District but before the transfer of lien of the applicants along with other 92 IHCs of Mardan Region, the IHCs of Peshawar District were already promoted as Offg: ASIs during the year 2008 against the available vacancies of Peshawar District.

4. On the availability of vacancies during the year 2009, all the 92 IHCs of Mardan Region including applicants were promoted as Offg: ASIs on 26-11-2009 in CCP, Peshawar.

5. As explained in para 03 above, IHCs of Peshawar District who were promoted as Offg: ASIs during the year 2008 before the transfer of lien of applicants become senior to them thus they have no right to claim seniority with their colleagues of Peshawar District.

The applicants may be informed accordingly.

d/c

[Signature]

FOR CAPITAL CITY POLICE OFFICER,
PESHAWAR.

12/3

1-13

بخدمت جناب پراونشل پولیس آفیسر صاحب خیر بختونخوا پشاور
بوساطت آفسران بالا (Through proper channel)



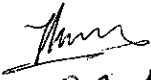
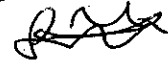


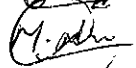
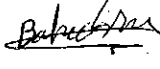



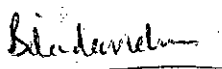


جناب عالی!

گزارش ہے کہ ہم ساکمان کا تعلق ضلع نوشہرہ سے ہے سال 2008 میں صوبائی حکومت نے ضلع نوشہرہ اور ضلع چارسدہ مردان ریجن علیحدہ کر کے CCP پشاور کیساتھ میج کیا سیناریٹی کے مسئلہ پر جناب پراونشل پولیس آفیسر صاحب خیر بختونخوا پشاور نے ایک بورڈ قائم کی جن کی سفارشات کی روشنی میں صاحب موصوف نے بحوالہ میونمبر 11-E-65/18564 مورخہ 23.07.2009 کو یہ فیصلہ کیا کہ ضلع ہذا اور ضلع چارسدہ کے جن پولیس آفسران نے CCP پشاور کے ساتھ (Lien) اختیار کی ہے۔ ان کو CCP پشاور میں PTC ہنگو کے رزلٹ کے مطابق سیناریٹی دی جائیگی۔ ہمارا پرموشن بحوالہ نوٹیفیکیشن نمبر 1-16557/EC-16537 مورخہ 26.11.2009 کو بحیثیت Offg: ASI ہو چکی ہے۔ اب CCPO صاحب پشاور نے بحوالہ نوٹیفیکیشن نمبر 1-15203/EC-15183 مورخہ 27.09.2011 کو صرف CCP پشاور کے ASIs کی کنفرمیشن کر کے لسٹ (E) میں پرموڈ کئے ہیں جبکہ ضلع نوشہرہ اور ضلع چارسدہ کے پولیس کو نظر انداز کئے ہیں جو کہ ان دونوں اضلاع کے پولیس کے ساتھ پرموشن کے سلسلہ میں نا انصافی ہے۔

ہم ساکمان نے اس سلسلہ میں جناب CCPO صاحب پشاور کو بحوالہ لٹرنمبر 8931/EC مورخہ 13.10.2011 بذریعہ درخواست استدعا کی تھی لیکن اس پر تاحال کوئی کارروائی نہ ہو سکی۔

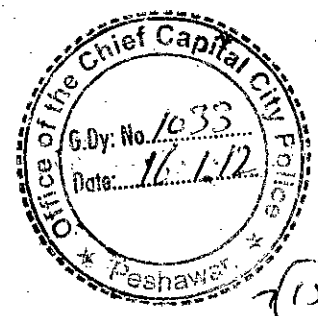
اب آپ صاحبان سے متوجہ ہونا تمنا ہے کہ نوٹیفیکیشن نمبر 11-E-65/18564 مورخہ 23.07.2009 کو مد نظر رکھتے ہوئے ہم ساکمان کو PTC ہنگو کے رزلٹ کے مطابق سیناریٹی دے کر لسٹ (E) میں پرموشن دینے کے احکامات صادر فرما کر مشکور فرمائیں تا حیات دعا گو رہیں گے۔
نوٹ:- (نوٹیفیکیشن نمبر 11-E-65/18564 مورخہ 23.07.2009 نوٹیفیکیشن نمبر 1-16557/EC-16537 مورخہ 26.11.2009 اور نوٹیفیکیشن نمبر 1-15203/EC-15183 مورخہ 27.09.2011 کی کاپی ہمراہ لف ہیں۔)

میں نوازش ہوگی

- | | | |
|---|---------------------------|------|
| العاض | | |
|  | زر داد علی نمبر ASI/525 | 1 ✓ |
|  | محمد عالم نمبر ASI/411 | 2 ✓ |
|  | محمد تیریز نمبر ASI/636 | 3 ✓ |
|  | شیر محمد نمبر ASI/477 | 4 ✓ |
|  | فیاض محمد نمبر ASI/494 | 5 ✓ |
|  | جمشید خان نمبر ASI/46 | 6 ✓ |
|  | محمد نعیم نمبر ASI/57 | 7 ✓ |
|  | بہادر شیر نمبر ASI/118 | 8 ✓ |
|  | افتخار حسین نمبر ASI/579 | 9 ✓ |
|  | صفدر علی نمبر ASI/270 | 10 ✓ |
|  | محمد ابراہیم نمبر ASI/140 | 11 ✓ |
|  | بلادر خان نمبر ASI/509 | 12 ✓ |
|  | ASI 693 | 13 ✓ |
|  | ASI 359 | 14 ✓ |

"D"

Dy No 13582 SSP/ML-6
24/7/09 27/7/09



From:- The District Police Officer,
Nowshera.

To:- The Capital City Police Officer,
Peshawar.

No. 478 /EC, Dated Nowshera the 16/01/2012.

Subject:- APPLICATION FOR THE GRANT OF SENIORITY.

Memo:

Enclosed please find herewith a self explanatory application along with connected documents submitted by ASIs of this District Police for the grant of seniority in the light of instructions/ directions issued vide PPO, NWFP, Peshawar Office memo No.18564-65/E-II, dated 23-07-2009 with their colleagues for onward submission to C.P.O Peshawar for further action please.

[Handwritten Signature]
District Police Officer,
Nowshera.

- C.C.P.O. Jani
- SSP/O _____
- SSP/I _____
- SP/Cantt _____
- SP/City _____
- SP/Rural _____
- SP/Sec _____
- SP/HQ _____
- SP/T.O _____
- SP/T. HQ _____
- DSP/L/OS _____
- P.O./C.C. _____
- PA/EC-II _____

EC-I *[Handwritten Signature]*
17/1/12

1

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

Service Appeal No. ²¹⁴___/2010²

Safdar Ali Officiating ASI No 270 ~~.....~~
Nobiskera Appellant.

Versus

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

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

Respectfully Sheweth,

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

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

Facts:

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

It is worthy to note that District Nowshehria has

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

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

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

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

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

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

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

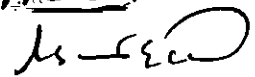
district is illegal.

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

Grounds: -

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

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

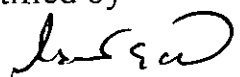
Through ^{Appellant}

 Ashraf Ali Khattak,
 Advocate, Peshawar

Dated: _____ / 06/ 2013

Affidavit

I, Safdar Ali Officiating ASI No. 270 Special Branch,
Nowshera, do hereby affirm and declare on oath that the contents of this rejoinder with attached documents are true and correct to the best of my knowledge.

Identified by


 Ashraf Ali Khattak,
 Advocate, Peshawar.


 Deponent

