


Cost of Rs. 20,000/- received in Service Appeal No. 2811/2021,

Titled Ghifoor Shah VS. Police Department

in the office of Superintendent. Vide Order 12/03/2024

Dated: 15/03/2024.

For   
**SUPERINTENDENT**  
/ Khyber Pakhtunkhwa  
Service Tribunal, Peshawar

Khyber Pakhtunkhwa  
Service Tribunal

To

The Chairman  
Service Tribunal,  
Khyber Pakhtunkhwa

Diary No. 11772

Dated 15-03-2024

Respondent no-4

Subject:-

APPLICATION FOR SUBMISSION OF  
RECORD IN SERVICE APPEAL NO.2811/2021  
TITLED GHAFUOR SHAH VS STATE.

Respected Sir,

With reference and veneration it is stated in your honor that request for the submission of entire record in stated appeal is made.

In the light of above authority is authority is requested to allow so that the record in the instant case/appeal may be submitted.



D.S.P Legal, Swat

15-03-2024

In compliance of Order dated 29/02/2024 of the honorable Khyber Pukhtunkhwa Service Tribunal, Peshawar in service appeal No.2811/2021 tilted Ghafoor Shah vs PPO, the seniority list C-1 of 2011 of District Swat is as under:-

S.No	Name & No.	D.O.B	Date of Enlistment	D/O promotions	Order of merit	Qualification	Remarks
1.	Mohibullah No. 161	22.01.1978	01.08.2003	Promoted as Offs: HC vide O.B No. 160 dated 30.07.2011	140/294	10 <sup>TH</sup>	Remarks: The lien of the LHC Mohibullah of PTC Hangu is hereby detached from PTC Hangu and attached to district Swat with immediate effect. He will accepted bottom seniority vide PPO Endst: 1488-91/EII dated 20.01.2011. In this office O.B No. 17 dated 22.01.2011.
2.	Aziz Ahmad No. 213/RR/517	02.03.1981	21.11.2003	do	29/341	FA	Name brought on promotion list C-I w.e.f 20.03.2011 O.B No. 154 dated 23.07.2011
3.	Gohar No. 66	10.01.1983	01.02.2002	do	40/341	10 <sup>th</sup>	do
4.	Akhtar Ali No. 147	02.03.1984	15.11.2003	do	47/341	BA	do
5.	Habib Ur Rahman No.550	11.04.1979	22.05.1998	do	54/341	10 <sup>th</sup>	do
6.	Tasleem Mian No. 430	03.01.1981	01.07.1999	do	76/341	FA	do
7.	Amir Zeb No. 963	01.04.1979	01.07.1999	do	80/341	FA	do

**ATTESTED**

*[Signature]*  
Deputy Superintendent of Police Legal  
Swat

8.	Amjad Iqbal No. 259	04.04.1978	02.05.2003	do	84/341	BA	do
9.	Nazir Ahmad No. 2596/1064	19.04.1983	17.11.2003	do	94/341	FA	1. Reverted vide OB No. 79 dated 04.05.2016 2. Reverted for the period of three years vide OB No. 201 dated 24.11.2016 3. Re promoted as Offs: HC w.e.f 2.05.2019 OB No. 104 dated 27.06.2019.
10.	Mushtaq Ahmad No. 1372	01.06.1978	22.05.1998	do	96/341	FA	do
11.	Muhammad Ishaq No. 1354	05.05.1980	05.07.2000	do	104/341	10 <sup>th</sup>	do
12.	Niaz Ali No. 1437	15.04.1982	01.02.2002	do	105/341	FA	do
13.	Aman Ullah Khan No. 842	01.02.1980	17.11.2003	do	117/341	MA	do Joined Education Department vide OB No. 119 dated 21.06.2012.
14.	Umar Hayat No. 468	13.01.1979	16.02.2002	do	145/341	BA	do
15.	Hussain Ali No. 1152	16.02.1980	15.11.2003	do	157/341	MA	do
16.	Farman Ali No. 500	27.02.1978	09.01.1996	do	163/341	10 <sup>th</sup>	do
17.	Gohar Rahman No. 1532	12.04.1979	01.07.2000	do	165/341	MA	do
18.	Afzal Hussain No.	01.03.1982	01.07.2000	do	174/341	FA	do

**ATTESTED**

*[Handwritten Signature]*  
Deputy Superintendent of Police  
Swat

## BRIEF REGARDING SERVICE APPEAL NO.2811/2021

It is submitted that Head-Constable Ghafoor Shah No. 166 of Capital City Police, Peshawar was enlisted in FRP Headquarter. Peshawar as Constable on 19-01-1995 and qualified recruit school course in the year 1995. He qualified Lower College Course during term ending 20-10-2001 (**annexed "A"**) held at Police Training College Hangu vide Notification No.4397-4447/S/Result, dated 14-12-2001, his name was brought on list C-I and he was promoted as Officiating Head-Constable in FRP Headquarter, Khyber Pakhtunkhwa, Peshawar. Later on, he was transferred to Malakand Region Vide CPO, Peshawar Order No.25317-23/E-II, dated 14-11-2007 (**annexed "B"**) and posted to Swat by RPO Malakand vide Order No.4699-4702/E dated 10/12/2007 (**annexed "C"**) and then transferred to Lower District Vide CPO, Peshawar Order No.2626/E-II, dated 17-06-2008 (**annexed "D"**). Subsequently, he was repatriated to Peshawar District vide CPO, Peshawar Order No.28560/E-II, dated 23-10-2008 (**annexed "E"**).

Pertinent to mention here that before transfer to Malakand Region vide CPO, Peshawar Order No.25317-23/E-II, dated 14-11-2007, the appellant was already promoted to the rank of HC BPS-7 on 16/09/2004 by Commandant FRP/HQrs Peshawar Order No.6531-40/OSI dated 16/09/2004, meaning thereby that his seniority on C-1 list was already fixed by Commandant FRP Peshawar. Worth mentioning here that the Lower School Course colleagues of appellant namely Yar Muhammad No.1308 at serial No.220 and Shahi Wadan No.718 at serial No.221 of C-1 list of District Swat were promoted to the rank of officiating Head Constables vide OB No.76 dated 18/04/2008, whereas the appellant was promoted to the rank of officiating HC on 16/09/2004, thereby meaning that the appellant kept himself silent regarding the benefit he taken in shape of promotion to officiating HC earlier than his lower pass colleagues.

Moreover, on repatriation from FRP Peshawar to respective regions, the appellant was transferred to district Swat by RPO Malakand vide his office Order Endst: No.4699-4702/E dated 10/12/2007 and served for almost 06 months and 07 days in district Swat. Appellant again was transferred to his domicile district by RPO Malakand vide his office Order Endst: No.2626/E dated 17/06/2008, however in both the above orders, nowhere lien of applicant was mentioned. Further added that appellant was transferred and posted to CCP Peshawar by DIG/HQrs: vide his office Order Endst: No.28560-62/E-II dated 23/10/2008. Appellant served for 10 months and 13 days in Malakand Region.

It is to further clarify that the appellant qualified intermediate college course on the quota of CCP Peshawar and his name was also brought on promotion list D by CCP Peshawar vide notification No.12966/E-I dated 07/07/2015. This fact denotes that after transfer from district Dir Lower to CCP Peshawar, how appellant was selected for intermediate college course as there is any transfer of lien order was issued by the CPO Peshawar on the request of appellant or otherwise. Representative of CCP Peshawar will be in better position to explain this fact before the honorable tribunal.