

FORM OF ORDER SHEET

Court of _____

Appeal No. 494/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/04/2024	<p>The appeal of Mr. Muhammad Yousaf resubmitted today by Mr. Umar Farooq Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 03.04.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p>REGISTRAR</p>

This is an appeal filed by Mr. Muhammad Yousaf today on 28.03.2024 against the impugned promotion order dated 28.11.2023 against which he made/preferred departmental appeal/ representation in January 2024 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiency.

1- Departmental appeal having no date be dated.

No. 710 /ST,

Dt. 29-03 /2024.




REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Umar Farooq Mohmand Adv.
High Court at Peshawar.

Respect Sir,

The departmental appeal moved before the
Appellate Authority on 1.1.2024, Now the
Statutory period of ninety days completed
and the appeal in hand re-submitted

2/4/2024 

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO. 494 /2024

MR. MUHAMMAD YOUSAF VS POLICE DEPARTMENT

INDEX

S. NO	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Service Appeal with affidavit	1-5
2.	Copy of Rules vide notification dated 24/09/2019	A	6-10
3.	Copy of notification dated 11/02/2020	B	10-18
4.	Copy of notification dated 11/02/2020	C	19-27
5.	Copy of impugned order dated 28/11/2023	D	28-29
6.	Copy of departmental appeal	E	30-31
7.	Wakalat Nama	

THROUGH: **APPELLANT** 
UMAR FAROOQ MOHMAND
ADVOCATES HIGH COURT

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO. 494 /2024

Mr. Muhammad Yousaf, Head Constable (BPS-09)
Police Line Ghallani, District Mohmand.

..... APPELLANT

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Regional Police Officer, Mardan Region.
- 3- Aziz Ali Shah S/O Farid Khan, ASI Police Station Ekkaghound, District Mohmand.
- 4- Ajmal Khan S/O Ismail MTO, District Police, District Mohmand.

.....RESPONDENTS

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL, 1974 AGAINST
THE IMPUGNED ORDER DATED 28/11/2023, WHEREBY
THE RESPONDENT NO. 01 HAS PROMOTED AND
CONFIRMED PRIVATE RESPONDENTS BEING JUNIOR
FROM APPELLANT AND WITH OUT FULFILLING ALL THE
CODAL AND LEGAL FORMALITIES AND AGAINST NOT
TAKING ACTION ON THE DEPARTMENTAL APPEAL OF
NINETY DAYS.

Prayer:-

That on acceptance of the instant service appeal, the impugned order dated 28/11/2023 may kindly be set aside to the extent of private respondent and the respondent be directed to consider the appellant for promotion to the post of ASI with all back and consequential benefits. Any other remedy which this august Tribunal deem fit may also be awarded in favour of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1) That the appellant was appointed as Levy Sepoy in the defunct Mohmand Agency now District Mohmand in the levies force and was performing his duties quite efficiently and to the entire satisfaction of superiors.
- 2) That it is important to mention here that after 25th Constitutional amendment the defunct FATA has been merged with the Province of Khyber Pakhtunkhwa and similarly the Khasadar as well as the levy force has been absorbed in the Khyber Pakhtunkhwa police force through Absorption rules known as Khasadar Force (Absorption in the Khyber Pakhtunkhwa Police) Rules 2019, issued through Notification dated 24/09/2019. Copy of Rules vide notification dated 24/09/2019 is attached as annexure.....**A**
- 3) That in pursuance to the ibid rules and all other enabling laws the Government of Khyber Pakhtunkhwa Home & Tribal Affairs Department has absorbed Khasadar force through notification dated 11/02/2020 in their respective ranks and accordingly the private respondent No.3 was absorbed as constable, shown at S.No.321 of the ibid notification and similarly private respondent



No.4 has been absorbed viz-a-viz. Copy of notification dated 11/02/2020 is attached as annexure.....**B**

- 4) That as such the appellant was initially appointed in the levy force hence according to above mentioned rules and other laws the Home & Tribal Affairs Department through a separate notification dated 11/02/2020 has absorbed the levy force of District Mohmand and accordingly the appellant was absorbed in his respective rank as Head Constable BPS-09, placed at S No 88 of the ibid notification. Copy of notification dated 11/02/2020 is attached as annexure.....**C**
- 5) That absorption in the police force of Khyber Pakhtunkhwa, the appellant started performing duty in the police department quite efficiently and to the entire satisfaction of superior and no complaint whatsoever.
- 6) That astonishingly the respondent No 1 issued the impugned order dated 28/11/2023 whereby the private respondent were confirmed against the post of Assistant Sub Inspector (BPS-11) despite the fact that the private respondents were absorbed as Constable while the appellant was absorbed as Head Constable, the respondent also not adopted the legal requirement for issuance the impugned order. Copy of impugned order dated 28/11/2023 is attached as annexure.....**D**
- 7) That feeling aggrieved from the impugned order the appellant alongwith their other colleagues filed departmental appeal before the Inspector General of Police but the same has not been responded till date. Copy of departmental appeal is attached as annexure.....**E**
- 8) That now the appellant having no other remedy, filed the instant service appeal on the following grounds amongst other:-

GROUND:

(4)

- A- That the impugned order dated 28/11/2023, whereby the private respondents have been confirmed against the post of ASI being junior from the appellant, is ultra vires, facts, law, norms of natural justice and materials on record, hence not tenable and liable to be set aside to the extent of private respondents.
- B- That the action and inaction of the respondents by ignoring the appellant and confirming the private respondents against the post of ASI being junior to the appellant is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside to the extent of private respondents.
- C- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- D- That, the treatment meted out to the appellant is clearly based on discrimination and malafide and as such the respondents violated the principle of natural justice.
- E- That the appellant has been discriminated by the respondents department on the subject noted above and as such the respondents violated the principles of natural justice.
- F- That the impugned order dated 28/11/2023, whereby the private respondents have been confirmed against the post of ASI being junior from the appellant is also violation of section 9 of the KP Civil Servant Act, 1973.
- G- That according to Article 38 of the Constitution of Islamic Republic of Pakistan, 1973, the state is bound to reduce disparity in the income and earning of individuals including persons in the Service of the Federation. That in light of the mentioned article the appellant is on strong footing.

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H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may very graciously be accepted as prayed for, please.

Moham
APPELLANT
THROUGH: *[Signature]*
UMAR FAROOQ MOHMAND
WALEED ADNAN *[Signature]*
&
MAHMOOD JAN *[Signature]*
KHANZAD GUL *[Signature]*
ADVOCATES HIGH COURT

CERTIFICATE:

No such like appeal is pending or filed between the parties on the subject matter before this Honorable Tribunal.

[Signature]
Advocate

AFFIDAVIT

I, Mr. Muhammad Yousaf (the appellant) do hereby solemnly affirm on oath that the contents of the above appeal are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.

[Signature]
DEPONENT



21 MARCH 2024

1A' (B)

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

Peshawar, dated the 24th September, 2019.

Revised
Wazir's
Signature

No. SO(Police-IT/HD/SMY/2019) */Khasadar Force* - In exercise of the powers conferred by section 10 of the Khyber Pakhtunkhwa Khasadar Force Act, 2019 (Khyber Pakhtunkhwa Act. No. XXXIV of 2019), read with section 5 thereof, the Government of the Khyber Pakhtunkhwa is pleased to make the following rules, namely:

The Khasadar Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019.

1. Short title, application and commencement.—(1) These rules may be called the Khasadar Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019.

- (2) These rules shall apply to all members of the Khasadar Force.
(3) These rules shall come into force at once.

2. Definitions.—(1) In these rules, unless there is anything repugnant in the subject or context, the following expressions shall have the meanings hereby respectively assigned to them, that is to say,—

- (a) "absorption" means the process of permanent induction of the members of the Khasadar Force in the Police, in accordance with these rules;
(b) "Act" means the Khyber Pakhtunkhwa Khasadar Force Act, 2019 (Khyber Pakhtunkhwa Act. No. XXXIV of 2019);
(c) "Provincial Police Officer" means the head of the Provincial Police, who is appointed under section 15

UP
ATTENDED

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of the Police Act, 2017 (Khyber Pakhtunkhwa Act No. II of 2017); and

(d) "Schedule" means the Schedule, appended to these rules;

(2) Words and expressions used, but not defined in these rules shall have the same meanings as are respectively assigned to them in the Act.

3. Absorption.—The members of the Khasadar Force shall be permanently absorbed in the Police, against vacancies to be newly created in the Police Department for the purpose, in the following manner:

(a) A Scrutiny Committee, headed by the Commandant, and having one member each from District Administration and District Account Officer of the district concern, shall prepare the lists of all the members of the Khasadar Force after personal appearance and scrutiny of record for submission to the Provincial Police Officer;

(b) the lists, submitted to the Provincial Police Officer, under sub-rule (1), after proper sifting, shall be forwarded to Home and Tribal Affairs Department of Government with the recommendations for permanent absorption of members of the Khasadar Force in the Police into the respective ranks or cadres as per the Schedule; and

(c) the Home and Tribal Affairs Department of Government, after receiving the lists of all the members of Khasadar Force, shall issue notification of absorption of the Khasadar Force in the Police after approval of the Cabinet.

A. J. Khan

A. J. Khan

(8)

4. Remuneration or incentives.—The Khasadar Force after absorption in the Police shall be entitled to the same benefits, remuneration and other incentives as are enjoyed by other members of the Police.

5. Training.—Special training modules shall be designed by the Training Wing of the Police for imparting requisite police training so that the members of the Khasadar Force are fully sensitized with all Police functions.

6. Seniority.—Members of the Khasadar Force, who are absorbed in the Police, in accordance with Government orders and instructions, shall take seniority in the Police from the date of the initial appointment upon recruitment in the Khasadar Force:

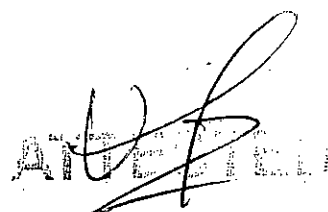
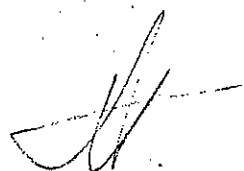
Provided that the officer inducted in one batch, upon induction, shall retain their inter se seniority as in the Khasadar Force:

7. Repeal and savings.—(1) All rules, orders or instructions, including the Federal Khasadar Force Service Rules, in force in respect of the Khasadar Force, immediately before the commencement of these rules, shall be deemed as repealed in so far those rules, orders or instructions are inconsistent with these rules.

(2) Notwithstanding the repeal of all rules, orders or instructions, including the Federal Khasadar Force Service Rules, mentioned in sub-rule (1)-

(a) affecting the seniority and promotion, all promotions done seniority determined and orders made shall be deemed to have been done, determined and made in accordance with law. The repeal, shall not affect any right, privilege, obligation or liability acquired, accrued or incurred under the repealed rules, orders and instructions;

and


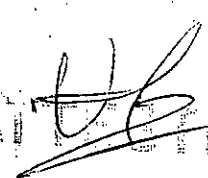


9

(b) shall not affect any investigation or legal proceedings in any Court of Law and shall be continued in the same manner as if the laws and rules have not been repealed.

3 Removing of difficulties.--(1) If any difficulty arises in giving effect to any provisions of these rules and notifications made thereunder, a Technical Committee, comprising of three members of the Police Department, to be notified by the Provincial Police Officer, headed by an Officer of Police, who shall not be below the rank of Deputy Inspector General of Police and two other members of Police Department, whose ranks shall not be less than Senior Superintendent of Police, may recommend to Government for giving effects to the provisions of these rules.

(2) Government, after considering such recommendations, submitted by the Technical Committee, under sub-rule (1), may, by notification, make such orders, not inconsistent with the provisions of the Act or these rules, as may appear to it to be necessary for the purpose of removing such difficulty.

 
A. H. B. E. O.

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SCHEDULE

[see rule 3(b)]

1. S.No.	2. From rank in (hasadar.	3. To rank in Police.
1.	Sepoy.	Constable (RPS-07)
2.	Lance Nair.	Constable A-1 (RPS-07)
3.	Nair.	Constable B-1 (RPS-07)
4.	Hawaladar.	Head Constable (RPS-09)
5.	NaibSubedar.	Assistant Sub-Inspector (RPS-11)
6.	Subedar.	Sub-Inspector (RPS-14)
7.	Subedar Major.	Inspector (RPS-16)

**Secretary to Government of the Khyber Pakhtunkhwa
Home & Tribal Affairs Department**

Encls No & date even:

Copy of the above is forwarded for information to the:

1. The Principal Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
3. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
4. The Registrar, Peshawar High Court, Peshawar.
5. The Secretary to Government of Khyber Pakhtunkhwa, Law Parliamentary Affairs & Human Rights Department, Peshawar.
6. PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
7. P.S to Secretary Home, Khyber Pakhtunkhwa, Peshawar.
8. The Manager, Government Printing Press, Peshawar with the request that it may be published in the official gazette and 50 copies be furnished to this office.

Section Officer (Police-II)

Ph: 091-9210503

Fax: 091-9210201

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[Handwritten signature]
ATTACHED

B, (11)

Amir (401)

12/2/2020 ALI Shah

(321)

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT.**

NOTIFICATION

Peshawar dated the, 11/2/2020

No.SO(Police)HD/SMY 2019 Merged Area/ 273-83 In pursuance of the provisions contained in section 5 of the Khyber Pakhtunkhwa Khasadars Force Act, 2019 (Khyber Pakhtunkhwa Act No.XXXIV of 2019) read with rule 3 of the Khasadar Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Officer, hereby orders absorption of the following members of Khasadars Force of Mohmand Tribal District in the Khyber Pakhtunkhwa Police with effect from the date of the initial appointment of the said members:

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
1.	JAN MUHAMMAD	ZARABAT KHAN	SM-16	INSP-16
2. ✓	ALI MURAD KHAN	ZARISTAN	N/SUB-04	ASI-11
3. ✓	BASHAR ALI SHER	QAWI SHER	N/SUB-04	ASI-11
4. ✓	FAZLI ZAHIR	ILAM SAID	N/SUB-04	ASI-11
5. ✓	NAJEEB KHAN	BULBUL KHAN	N/SUB-04	ASI-11
6. ✓	HAJI MUHAMMAD	WALI MUHAMMAD	N/SUB-04	ASI-11
7.	MUHAMMAD WASEEM KHAN	MUHAMMAD IBRAHIM KHAN	N/SUB-04	ASI-11
8. ✓	BAKHAT MOHAMMAD	ZAR MUHAMMAD	N/SUB-04	ASI-11
9. ✓	ZAHIR GUL	ALI AKBAR	N/SUB-04	ASI-11
10. ✓	MIR AFZAL	HASSAN GUL	N/SUB-04	ASI-11
11.	FARHAD KHAN	MEHBOOB	N/SUB-04	ASI-11
12. ✓	PIR MOHAMMAD	NAMDAR	N/SUB-04	ASI-11
13.	AKBAR KHAN	MALAK FAROOQ	N/SUB-04	ASI-11
14.	HAZRAT JAN	GUL NAWAZ	HAV-02	HC-09
15.	NADIR KHAN	ABDUL ABAS KHAN	HAV-02	HC-09
16.	BAKHT MUNIR	ARAB JAN	HAV-02	HC-09
17.	RASOOL KHAN	HABIB RASOOL	HAV-02	HC-09

12

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
18.	TAHIR SHAH	JAMEEL SHAH	HAV-02	HC-09
19.	SAJID ALI	BAKHT MUNIR	HAV-02	HC-09
20.	MUKHTIAR	BODHA	HAV-02	HC-09
21.	MUHAMMAD ILYAS	DOST MUHAMMAD	HAV-02	HC-09
22.	BACHA	AIN UD DIN	HAV-02	HC-09
23.	KHUWAJA MUHAMMAD	FARAZ	HAV-02	HC-09
24.	SHADAR KHAN	SHAMAS KHAN	HAV-02	HC-09
25.	NAOSHERAWAN	AMEER NAWAZ	HAV-02	HC-09
26.	ZAHIR KHAN	MASHOOQ	HAV-02	HC-09
27.	ZUBAIR SHAH	FAQIR SHAH	HAV-02	HC-09
28.	ARAB KHAN	NOOR DIN	HAV-02	HC-09
29.	MIR AKBAR	NOOR AKBAR	HAV-02	HC-09
30.	ADIL AFZAL	HAJI REHMAN	HAV-02	HC-09
31.	BAKHT LAL	ZAR LAL	HAV-02	HC-09
32.	HABIB SHAH	ARABI SHAH	HAV-02	HC-09
33.	AYEZ KHAN	WAZIR	HAV-02	HC-09
34.	DAURAN KHAN	SARWAR KHAN	HAV-02	HC-09
35.	KHALIL UR REHMAN	MISRI KHAN	HAV-02	HC-09
36.	REHMAN KHAN	ABDUL JABBAR	HAV-02	HC-09
37.	MOHAMMAD ALI	ABDUR REHMAN	HAV-02	HC-09
38.	FARHAD	SAHIB KHAN	HAV-02	HC-09
39.	SHAH FAHAD	MOHAMMAD ALI	HAV-02	HC-09
40.	HAZRAT MUHAMMAD	DILAWAR	HAV-02	HC-09
41.	ABDUL QADUS	Haidar Zaman	HAV-02	HC-09
42.	ARSHID KHAN	MUMTAZ KHAN	KHSDR-01	FC-07
43.	TAJWAL KHAN	BASHAR	KHSDR-01	FC-07
44.	SARFRAZ KHAN	UMAR KHAN	KHSDR-01	FC-07
45.	ZULAM KHAN	ALAM KHAN	KHSDR-01	FC-07
46.	SHAH ZADA	MUSLIHAT KHAN	KHSDR-01	FC-07
47.	WAHID KHAN	AQAL SHER	KHSDR-01	FC-07
48.	ATTA UR REHMAN	YOUSAF KHAN	KHSDR-01	FC-07
49.	RAHIM JAN	SARFARAZ KHAN	KHSDR-01	FC-07
50.	KHURSHID	DAWAR KHAN	KHSDR-01	FC-07
51.	ASLAM KHAN	ASKAR KHAN	KHSDR-01	FC-07
52.	ROMAAN KHAN	ABDUL AZIZ	KHSDR-01	FC-07
53.	HAMEED KHAN	ARAB DIN	KHSDR-01	FC-07
54.	HAZRAT WALI	MUSANIF	KHSDR-01	FC-07
55.	NAVEED ALAM	SAID ALAM	KHSDR-01	FC-07
56.	SAID AHMAD	SHIHDAD	KHSDR-01	FC-07
57.	PIR MUHAMMAD	HAJI DILAWAR	KHSDR-01	FC-07

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13

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
286.	FAZLI RAZIQ	SADAR KHAN	KHSDR-01	FC-07
287.	GUL ZAMIN	ZABARDAST	KHSDR-01	FC-07
288.	SADAM HUSSAIN	GUL AMIN	KHSDR-01	FC-07
289.	MUSTAFA	AFSAR KHAN	KHSDR-01	FC-07
290.	MUHAMMAD FAYAZ	SHER BAHADAR	KHSDR-01	FC-07
291.	IBRAHIM KHAN	HABIB SAID	KHSDR-01	FC-07
292.	AYAZ KHAN	SULTAN MOHAMMAD	KHSDR-01	FC-07
293.	AIZAZ ALI	SABIR REHMAN	KHSDR-01	FC-07
294.	YOUSAF KHAN	RASOOL KHAN	KHSDR-01	FC-07
295.	PARVEEZ KHAN	AJMAL KHAN	KHSDR-01	FC-07
296.	IFTIKHAR	MOHD YOUSAF	KHSDR-01	FC-07
297.	FARHAD ALI	GULAB KHAN	KHSDR-01	FC-07
298.	AMJAD KHAN	TAJ MOHAMMAD	KHSDR-01	FC-07
299.	HALIM SAID	NOOR SAID	KHSDR-01	FC-07
300.	ZAFIHOOR KHAN	ILAL SAID	KHSDR-01	FC-07
301.	KASHIF	FAZALI REHMAN	KHSDR-01	FC-07
302.	KHAJISTA REHMAN	IRA JAN	KHSDR-01	FC-07
303.	ISMAIL KHAN	QADAR KHAN	KHSDR-01	FC-07
304.	ASHIQ KHAN	HASTAM KHAN	KHSDR-01	FC-07
305.	ITBAR SHAH	ZIARAT WALI	KHSDR-01	FC-07
306.	SHAKEEL AHMAD	KITAB JAN	KHSDR-01	FC-07
307.	IQRAR KHAN	REDI GUL	KHSDR-01	FC-07
308.	ABDUL WAHAB	MUHAMMAD GUL	KHSDR-01	FC-07
309.	ITBAR JAN	MUSA JAN	KHSDR-01	FC-07
310.	SHAMSHAD KHAN	BAKHMAL SHER	KHSDR-01	FC-07
311.	SHAKIR ULLAH	ASHRAF KHAN	KHSDR-01	FC-07
312.	SHAKIR KHAN	SAID BAD SHAH	KHSDR-01	FC-07
313.	HAYAT KHAN	ABDUL WAHID	KHSDR-01	FC-07
314.	RIAZ KHAN	SHER RAHMAN	KHSDR-01	FC-07
315.	ABDUL HAMEED	ALI AKBAR	KHSDR-01	FC-07
316.	JABBAR KHAN	ALAM GUL	KHSDR-01	FC-07
317.	WAHID ULLAH	ABDULLAH	KHSDR-01	FC-07
318.	KHALID SHAH	WILAYAT SHAH	KHSDR-01	FC-07
319.	ABID KHAN	KHAN QADAR	KHSDR-01	FC-07
320.	MALIK-E- AMAN	MOHAMMAD REHMAN	KHSDR-01	FC-07
321.	IZAZ ALI SHAH	FARID KHAN	KHSDR-01	FC-07
322.	YASIR KHAN	NASIR KHAN	KHSDR-01	FC-07
323.	SHER WALI	NAZAR KHAN	KHSDR-01	FC-07
324.	MUHAMMAD ROOHUL AMIN	NIZAMUDDIN	KHSDR-01	FC-07
325.	SHER MUHAMMAD	SAMUEL KHAN	KHSDR-01	FC-07
326.	HAJI GUL	HAJI REHMAN	KHSDR-01	FC-07

14

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
398.	SHAKEEL KHAN	TAMASH KHAN	KHSDR-01	FC-07
399.	LIAQAT ALI	SAPIN GUL	KHSDR-01	FC-07
400.	NADIR KHAN	HAJI GUL BASHI	KHSDR-01	FC-07
401.	AJMAL KHAN	ISMAIL	KHSDR-01	FC-07
402.	AMIN KHAN	DAWAI KHAN	KHSDR-01	FC-07
403.	ARSHID KHAN	HASSAN KHAN	KHSDR-01	FC-07
404.	GHAZI MAR JAN	HABIB	KHSDR-01	FC-07
405.	ISMAIL	KHASHMIR	KHSDR-01	FC-07
406.	JAVED KHAN	ABUL AKBAR	KHSDR-01	FC-07
407.	NAZIR KHAN	MUHAMMAD HANIF	KHSDR-01	FC-07
408.	ASGHAR ALI	SHEIKH MAZDOOR	KHSDR-01	FC-07
409.	IHSAN ULLAH	KABIL KHAN	KHSDR-01	FC-07
410.	NAIAZ MUHAMAMD	DOST MUHAMMAD	KHSDR-01	FC-07
411.	YAR ALI	ILAM SAID	KHSDR-01	FC-07
412.	INZAR GUL	ISMAIL	KHSDR-01	FC-07
413.	HAI REHMAN	ZEWAR KHAN	KHSDR-01	FC-07
414.	MUHAMMAD AYAZ	RANGIN KHAN	KHSDR-01	FC-07
415.	MASOOD JAN	MOHD JAMAL	KHSDR-01	FC-07
416.	YASIR AHMAD	BAHADUR	KHSDR-01	FC-07
417.	JAVID KHAN	ITBAR KHAN	KHSDR-01	FC-07
418.	ZAKIR KHAN	MUHAMMAD KAMAL	KHSDR-01	FC-07
419.	KHALIL	HAZRAT HASSAN	KHSDR-01	FC-07
420.	ABDULLAH	SALAM KHAN	KHSDR-01	FC-07
421.	MUHAMMAD DAWOOD	ABDUL MATEEN	KHSDR-01	FC-07
422.	IFTIKHAR	GUL BADSHAH	KHSDR-01	FC-07
423.	ATTA ULLAH	HAI GUL JAN	KHSDR-01	FC-07
424.	AMAN KHAN	BAIT UR REHMAN	KHSDR-01	FC-07
425.	ABBAS ALI KHAN	KHALIQ DAD	KHSDR-01	FC-07
426.	AHMAD ALI	QASIM KHAN	KHSDR-01	FC-07
427.	MUHAMMAD ARIF	IHSANUDIN	KHSDR-01	FC-07
428.	IRFAN	NOOR REHMAN	KHSDR-01	FC-07
429.	ASAD KHAN	SHAHI GUL	KHSDR-01	FC-07
430.	ZAHHEER ULLAH	BASHI	KHSDR-01	FC-07
431.	MUSAWER KHAN	REKHAM GUL	KHSDR-01	FC-07
432.	ZAHIR KHAN	MISAL KHAN	KHSDR-01	FC-07
433.	INAM ULLAH	AMEEN DAD	KHSDR-01	FC-07
434.	WAQAS KHAN	NAZIR KHAN	KHSDR-01	FC-07
435.	HAYAT KHAN	HAI ZAHIR KHAN	KHSDR-01	FC-07
436.	MAZ ULLAH	NAJEEM KHAN	KHSDR-01	FC-07

[Handwritten Signature]

10

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
437.	SAJJAD KHAN	MAZHAR KHAN	KHSDR-01	FC-07
438.	MALIK WISAL	ATTAULLAH	KHSDR-01	FC-07
439.	MOHAMMAD ASIF	ZARNOSH KHAN	KHSDR-01	FC-07
440.	ABU ZAR	MINADAR	KHSDR-01	FC-07
441.	TAWAF	HAJI LAL SADIQ	KHSDR-01	FC-07
442.	KASHIF KHAN	WALI KHAN	KHSDR-01	FC-07
443.	ABU BAKAR	WILAYAT SHAH	KHSDR-01	FC-07
444.	DIYAR KHAN	SAID GHULAM	KHSDR-01	FC-07
445.	MOHBI ULLAH	BASI KHAN	KHSDR-01	FC-07
446.	FAYYAZ KHAN	ILYAS KHAN	KHSDR-01	FC-07
447.	ABDUL JABAR KHAN	MALOOK KHAN	KHSDR-01	FC-07
448.	USMAN KHAN	MEHMOOD KHAN	KHSDR-01	FC-07
449.	GHAFFAR ALI	MALIK MEMBER	KHSDR-01	FC-07
450.	SHER HASSAN	HAJI INZAR GUL	KHSDR-01	FC-07
451.	IRFAN	TESHSIL KHAN	KHSDR-01	FC-07
452.	NAZ WALI	SABZALI KHAN	KHSDR-01	FC-07
453.	HAZRAT UMAR	SHAH PASAND	KHSDR-01	FC-07
454.	TEKA DAR	FAZIL	KHSDR-01	FC-07
455.	TAJ WALI	SHAH WALI	KHSDR-01	FC-07
456.	ZARBAD SHAH	REHMAN GUL	KHSDR-01	FC-07
457.	NOOR JAN	MAGHAL KHAN	KHSDR-01	FC-07
458.	NISAR AHMAD	NOOR MOHAMMAD	KHSDR-01	FC-07
459.	ADNAN ALI	KABAL SAID	KHSDR-01	FC-07
460.	ABDUL HALEEM	HUKMAT KHAN	KHSDR-01	FC-07
461.	SHAH NAWAZ	ZAR LAL	KHSDR-01	FC-07
462.	FIDA MOHAMMAD	TAMASH	KHSDR-01	FC-07
463.	IRFAN ULLAH	SAID MEHMOOD	KHSDR-01	FC-07
464.	ASFANDIYAR	DAFTARJ	KHSDR-01	FC-07
465.	SABAZ ALI	ALAM ZEB	KHSDR-01	FC-07
466.	KHALID KHAN	ADAM KHAN	KHSDR-01	FC-07
467.	HAMZA	DALAL	KHSDR-01	FC-07
468.	MIRWAS KHAN	SULTAN	KHSDR-01	FC-07
469.	FARHAD	LAL MOHAMMAD	KHSDR-01	FC-07
470.	ZAHID ULLAH	ZIRAT GUL	KHSDR-01	FC-07
471.	ALMAS	SAID MOHAMMAD	KHSDR-01	FC-07
472.	TAJ MOHAMMAD	GUL MOHAMMAD	KHSDR-01	FC-07
473.	NASIR KHAN	GHAIRAT JAN	KHSDR-01	FC-07
474.	SHER BADSHAH	SHAHZADA	KHSDR-01	FC-07
475.	TAIMOOR AHMAD	MOHAMMAD BASHIR	KHSDR-01	FC-07
476.	RASOOL KHAN	UMAR KHAN	KHSDR-01	FC-07

16

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
477.	NADEEM	Haji AZIM	KHSDR-01	FC-07
478.	SHAH NAWAZ	ZIARAT GUL	KHSDR-01	FC-07
479.	ALAMGIR KHAN	ABDUL WAJID	KHSDR-01	FC-07
480.	ZAHIR KHAN	IZAT KHAN	KHSDR-01	FC-07
481.	LALI GUL	MALANG	KHSDR-01	FC-07
482.	MOHAMMAD IKRAM	SAHIB ZADA	KHSDR-01	FC-07
483.	PARVEZ KHAN	SHAH JEHAN	KHSDR-01	FC-07
484.	TAJIF KHAN	HUSSAIN	KHSDR-01	FC-07
485.	ABDUL MALIK	MALIK BAIDAR	KHSDR-01	FC-07
486.	MISBAH ULLAH	ABDUL MATIN	KHSDR-01	FC-07
487.	WALI ULLAH	YOUSAF KHAN	KHSDR-01	FC-07
488.	SABIR ULLAH	IHSANULLAH	KHSDR-01	FC-07
489.	SHAFI ULLAH	NAMRAOZ KHAN	KHSDR-01	FC-07
490.	AYAZ KHAN	ISLAM KHAN	KHSDR-01	FC-07
491.	IKHTISHAM KHAN	ABDUL JABAR	KHSDR-01	FC-07
492.	KHAHIF KHAN	MOHAMMAD SAEED	KHSDR-01	FC-07
493.	SAID ULLAH	SHER ZADA	KHSDR-01	FC-07
494.	MOHAMMAD KHAN	MOHMAND KHAN	KHSDR-01	FC-07
495.	EWAZ KHAN	GUL MOHAMMAD	KHSDR-01	FC-07
496.	MIR ALAM SHAH	ZAHIR SHAH	KHSDR-01	FC-07
497.	WAJID IQBAL	ABDUL WAHAB	KHSDR-01	FC-07
498.	ISMAIL KHAN	DILAWAR	KHSDR-01	FC-07
499.	MOBEEN KHAN	MUKHTIAR KHAN	KHSDR-01	FC-07
500.	GHULAM SAID	ZAFAR	KHSDR-01	FC-07
501.	PARVEEZ KHAN	FARDOOS KHAN	KHSDR-01	FC-07
502.	RAHMAT SHAH	MOHAMMAD JAN	KHSDR-01	FC-07
503.	MOHAMMAD KHAN	ZARIF	KHSDR-01	FC-07
504.	KHALID KHAN	ZANOSH KHAN	KHSDR-01	FC-07
505.	SHER WALI	SHER ZADA	KHSDR-01	FC-07
506.	IFTIKHAR KHAN	SAHIB ZADA	KHSDR-01	FC-07
507.	FAWAD KHAN	ROFAN	KHSDR-01	FC-07
508.	MUJAHID KHAN	GHAIRAT JAN	KHSDR-01	FC-07
509.	AMIR NAWAZ	SAIDA GUL	KHSDR-01	FC-07
510.	MOHAMMAD RAFIQ	GHAIRAT KHAN	KHSDR-01	FC-07
511.	PAZIR KHAN	MOHAMMAD HANIF	KHSDR-01	FC-07
512.	HAMZALA KHAN	SAHIB KHAN	KHSDR-01	FC-07
513.	SALAH-UD-DIN	HAZRAT MIR	KHSDR-01	FC-07
514.	SIRAJ-UD-DIN	MIAN DOOD KHAN	KHSDR-01	FC-07
515.	FALAK NIAZ	NISAR MOHAMMAD	KHSDR-01	FC-07
516.	MUKHTIAR	NAWAZ KHAN	KHSDR-01	FC-07

(17)

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
596.	RAFAN KHAN	ZARGAR KHAN	KHSDR-01	FC-07
597.	MUSTAMIR SHAH	MOHD SHAH	KHSDR-01	FC-07
598.	ABIDULLAH	KHAISTA REHMAN	KHSDR-01	FC-07
599.	ABID ALI	HAMIDULLAH KHAN	KHSDR-01	FC-07
600.	SAFIR KHAN	BASHIR KHAN	KHSDR-01	FC-07
601.	NAVEED BAKHTAIR	BAKHTIAR	KHSDR-01	FC-07
602.	FEROZ KHAN	ZARD ALI KHAN	KHSDR-01	FC-07
603.	ASIF KHAN	FAZAL MANAN	KHSDR-01	FC-07
604.	ABID KHAN	PAKISTAN	KHSDR-01	FC-07
605.	IKHTISHAM KHAN	JAN MUHAMMAD	KHSDR-01	FC-07
606.	IZHAR-UL-HAQ	ABDUL WAHID	KHSDR-01	FC-07
607.	QASIM KHAN	BASHIR KHAN	KHSDR-01	FC-07
608.	HAYAT KHAN	KHAISTA REHMAN	KHSDR-01	FC-07
609.	ZIAULLAH	ZAINULLAH	KHSDR-01	FC-07
610.	DIN MUHAMMAD	MUHAMMAD	KHSDR-01	FC-07
611.	MUHAMMAD	IHSANULLAH	KHSDR-01	FC-07
612.	MOBAIS KHAN	NOOR MUHAMMAD	KHSDR-01	FC-07
613.	KHAISTA REHMAN	SAID GULAB	KHSDR-01	FC-07
614.	MUSTAQIM KHAN	FARSAID	KHSDR-01	FC-07
615.	MANZOOR KHAN	KHANAWADA	KHSDR-01	FC-07
616.	NUHAMMAD ARIF	NAUKARI KHAN	KHSDR-01	FC-07
617.	SHAH FARMAN	MOHABAT SHAH	KHSDR-01	FC-07
618.	HISAM UL HAQ	JAMIL	KHSDR-01	FC-07
619.	SAIF ULLAH	JUMA RAZKHAN	KHSDR-01	FC-07
620.	JAWAD AHMAD	USMAN KHAN	KHSDR-01	FC-07
621.	SAD ALI	ABDUL WALL	KHSDR-01	FC-07
622.	MUHAMMAD SHABIR	MUHAMMAD ZAHIR	KHSDR-01	FC-07

2. The above absorption shall be subject to the following terms and conditions:

- (i) Their services shall be governed under the Khyber Pakhtunkhwa Police Act, 2017 and the rules made thereunder.
- (ii) A member shall not be entitled for absorption, if he has resigned from Khasadar Force Service or has been terminated from the Service ibid on account of misconduct, inefficiency or any other grounds or has been retired from Service under the Khyber Khasadars Rules-1950 and Khasadars Service Rules-2011, before commencement of the Khyber

(18)

Pakhtunkhwa Khasadars Force Act, 2019 (Khyber Pakhtunkhwa Act No. XXXIV of 2019).

- (iii) Their services shall be considered regular and they shall be eligible for pension and deduction of General Provident fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).
- (iv) Their seniority shall be determined in accordance with rule 6 of the Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.
- (v) They shall undergo training as provided in rule 5 of Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019.

Secretary

sd to Government of the Khyber Pakhtunkhwa
Home and Tribal Affairs Department

No. & date even.

CC to:

1. Inspector General of Police, Khyber Pakhtunkhwa.
2. Accountant General Khyber Pakhtunkhwa.
3. Regional Police Officer, Mardan
4. District Police Officer Mohmand Tribal District.
5. Deputy Commissioner Mohmand Tribal District
6. PS to Chief Secretary Government of Khyber Pakhtunkhwa
7. PS to Secretary, Home & TAs Department, Khyber Pakhtunkhwa.
8. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa.
9. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa
10. Manager Printing Press for notifying the same in the official gazette.
11. Office record file.


Section Officer (Lovies & Khasadars)

C, (19)

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT.

NOTIFICATION

Peshawar dated the, 11/2/2020

No. SO(Police)HD/SMY 2019 Merged Area/ 251-61 In pursuance of the provisions contained in section 9 of the Khyber Pakhtunkhwa Levies Force Act, 2019 (Khyber Pakhtunkhwa Act No.XXXV of 2019) read with rule 3 of the Levies Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Officer, hereby orders absorption of the following members of Levies Force of Mohmand Tribal District in the Khyber Pakhtunkhwa Police with effect from the date of the initial appointment of the said members:

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
1	FARHAD ALI	SHAH MEHMOOD	SM-16	Insp-16
2	LIAQAT ALI	HASSAN JAN	SM-16	Insp-16
3	MUKARAM KHAN	TAJ MOHAMMAD	SUB-13	SI-14
4	REHMAN KHAN	SADAF KHAN	SUB-13	SI-14
5	SAID ALAM	ALIM JAN	SUB-13	SI-14
6	DILFARAZ KHAN	JAN SHER KHAN	SUB-13	SI-14
7	SARDAR HUSSAIN	MASHAHOOR KHAN	SUB-13	SI-14
8	SHER ZAMEEN	FATEH KHAN	SUB-13	SI-14
9	MOHAMMAD ISRAR KHAN	MOHAMMAD YOUSAF	SUB-13	SI-14
10	ASAD ALI	DOST MOHAMMAD	SUB-13	SI-14
11	MUSHARAF KHAN	NOOR ZADA	SUB-13	SI-14
12	AMJAD ALI	SHER REHMAN	SUB-13	SI-14
13	INAYAT-UR REHMAN	AURANG ZEB	SUB-13	SI-14
14	QASIM JAN	ABDUL HAKIM	SUB-13	SI-14
15	INYAT ULLAH	HABIB KHAN	SUB-13	SI-14
16	MOHAMMAD AYAZ	MOHAMMAD JALIL	SUB-13	SI-14
17	MOHAMMAD NAWAB	DIRNAWAB	SUB-13	SI-14
18	ITBAR KHAN	ASHRAF KHAN	SUB-13	SI-14
19	KHAN REHMAN	NAZAR DIN	SUB-13	SI-14
20	ZUBIR KHAN	MOHAMMAD AMIN	SUB-13	SI-14
21	NOOR ZAMIN	GUL KHAN	N/Sub-11	ASI-11

(20)

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
22	RAHIM GUL	MOHAMMAD ALI	N/Sub-11	ASI-11
23	FIDA MOHAMMAD ✓	MOHAMMAD DAUD KHAN	N/Sub-11	ASI-11
24	RAZA MOHAMMAD ✓	HAJI MOHAMMAD	N/Sub-11	ASI-11
25	REHMAN KHAN	AMIR ZAMAN	N/Sub-11	ASI-11
26	MOHAMMAD ISHAQ	RAHAT GUL	N/Sub-11	ASI-11
27	MOHBAT SHAH	DOSTAN KAHN	N/Sub-11	ASI-11
28	FAZAL HAQ	ARAB GUL	N/Sub-11	ASI-11
29	AKBAR SHAH ✓	FAZAL JAN	N/Sub-11	ASI-11
30	MUSHARAF KHAN	ZAR ALI KHAN	N/Sub-11	ASI-11
31	SHAD ALI	SABAZ ALI KHAN	N/Sub-11	ASI-11
32	SHAH ROOM	HABIB SAID	N/Sub-11	ASI-11
33	NADIR KHAN	WAZIR KHAN	N/Sub-11	ASI-11
34	KHALID KHAN	IZZAT GUL	N/Sub-11	ASI-11
35	NAEEM KHAN	NAWAZ KHAN	N/Sub-11	ASI-11
36	GUL SHAKIR	MUNIR KHAN	N/Sub-11	ASI-11
37	SALIM KHAN	ABDUR REHMAN	N/Sub-11	ASI-11
38	SOHAIL MOHAMMAD	BAHDAR KHAN	N/Sub-11	ASI-11
39	SAID JAN	AMIRZA JAN	N/Sub-11	ASI-11
40	HUSSAIN KHAN	LIAQAT ALI KHAN	N/Sub-11	ASI-11
41	ALI ZAR SHAH	KHAN AMIR	N/Sub-11	ASI-11
42	MOHAMMAD IHSAN	HAJI DOST MOHAMMAD	N/Sub-11	ASI-11
43	SHAH SAID	SAZ KHAN	N/Sub-11	ASI-11
44	SHAFI ULLAH	MIRZA KHAN	N/Sub-11	ASI-11
45	ARSHAD KHAN	ALIM KHAN	N/Sub-11	ASI-11
46	WAJID ALI	AMIR GUL	N/Sub-11	ASI-11
47	SARDAR WALI	ISRAR UD DIN	HAV-08	HC-09
48	MUJAHID KHAN	JAFFAR KHAN	HAV-08	HC-09
49	MURAD KHAN	NIHAR KHAN	HAV-08	HC-09
50	ALI KHAN	SARWAR KHAN	HAV-08	HC-09
51	AMAN ULLAH	MIAN MOHAMMAD SADIQ	HAV-08	HC-09
52	MUZAMIL SHAH	GHAFOOR SHAH	HAV-08	HC-09
53	SHAH NAWAZ	HUSSAIN	HAV-08	HC-09
54	ZAHID KHAN	AMROZ KHAN	HAV-08	HC-09
55	MADADT KHAN	DAULAT KHAN	HAV-08	HC-09
56	ROOMAN KHAN	ABDUL SAMAD	HAV-08	HC-09
57	HUJAM KHAN	BAHDUR KHAN	HAV-08	HC-09
58	NAIZ KHAN	LAHORE KHAN	HAV-08	HC-09
59	KHALID KHAN	BAKHTAWAR KHAN	HAV-08	HC-09
60	ZEFAN KHAN	ABDULLAH KHAN	HAV-08	HC-09
61	ZABIH ULLAH	DORAJ MOHAMMAD	HAV-08	HC-09
62	MOHAMMAD ISRAIL	LUQMAN	HAV-08	HC-09
63	GUL SHER	ILYAS KHAN	HAV-08	HC-09

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
64	BANARAS ALI	ANWAR FARS	HAV-08	HC-09
65	MUSTA KALIM	SAEED MOHAMMAD	HAV-08	HC-09
66	ZAFIR GUL	FAQIR MOHD	HAV-08	HC-09
67	GUL MOHAMMAD	ZAR KHAN	HAV-08	HC-09
68	NASSER ULLAH	NAWAB KHAN	HAV-08	HC-09
69	BILAL KHAN	SALIMAN SHAH	HAV-08	HC-09
70	ASLAM JAN	HALIM JAN	HAV-08	HC-09
71	MOHAMMAD YOUNAS	KHAN ZAMAN	HAV-08	HC-09
72	YAR MOHAMMAD	NADAR SHER	HAV-08	HC-09
73	IQBAL KHAN	HABIBULLAH	HAV-08	HC-09
74	TAIB KHAN	GULAB SAID	HAV-08	HC-09
75	ISHFAQ KHAN	SHER MOHAMMAD	HAV-08	HC-09
76	MUSAFAR KHAN	BISMILLAH JAN	HAV-08	HC-09
77	SHAHID SHAH	ATTAULLAH	HAV-08	HC-09
78	ALAMGIR KHAN	MURAD KHAN	HAV-08	HC-09
79	RAZ MOHAMMAD	PIR MOHAMMAD	HAV-08	HC-09
80	IBADDAT SHER	MIRBAZ KHAN	HAV-08	HC-09
81	SALIM KHAN	DILAWAR KHAN	HAV-08	HC-09
82	ARSHAD KHAN	SARDAR KHAN	HAV-08	HC-09
83	MOHAMMAD AMIN KHAN	MOHAMMAD NISAR	HAV-08	HC-09
84	KAMRAN KHAN	MURAD KHAN	HAV-08	HC-09
85	MOHAMMAD SHAFIQ	KHAN REHMAN	HAV-08	HC-09
86	BACHA MIR	KHAN REHMAN	HAV-08	HC-09
87	IBRAHIM	BEHRAM	HAV-08	HC-09
88	MOHAMMAD YOUSAF	KABAL KHAN	HAV-08	HC-09
89	MOHAMMAD IKRAM	AZAM SHER	HAV-08	HC-09
90	ABDUL AKBAR	YOUSAF GUL	HAV-08	HC-09
91	IHSAN ULLAH	ZAR MULA KHAN	HAV-08	HC-09
92	IZAT GUL	BAD SHAH GUL	HAV-08	HC-09
93	FAZAL MOHAMMAD	GUL MOHAMMAD	HAV-08	HC-09
94	IFTHIKAR AHMAD	FASHAM GUL	HAV-08	HC-09
95	RAHIM GUL	AMAN GUL	HAV-08	HC-09
96	NIAZ MOHAMMAD	SHARAIF KHAN	HAV-08	HC-09
97	MOHAMMAD KHAN	NAZAR KHAN	HAV-08	HC-09
98	TEHSIN ULLAH	ABBAS ALI	HAV-08	HC-09
99	UMAR MOHAMMAD	BAKHTIAR MOHAMMAD	HAV-08	HC-09
100	DURAN SHAH	HAWALDAR	HAV-08	HC-09
101	MOHAMMAD ZAHID	MOHAMMAD SHAH	HAV-08	HC-09
102	JAN MOHAMMAD	GUL MOHAMMAD	HAV-08	HC-09
103	AMRAD ULLAH	JAMAL KAHN	HAV-08	HC-09
104	MOHAMMAD SHAFIQ	MOHAMMAD	HAV-08	HC-09

ATTACHED

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
		SHUGAIB		
105	QABIL KHAN	NAWAB KHAN	HAV-08	HC-09
106	MOHAMMADA KHAN	MOHAMMAD AMIN	HAV-08	HC-09
107	ZAR JAMAL	NAWAB KHAN	HAV-08	HC-09
108	WAJID ALI	NAIZ MOHAMMAD	HAV-08	HC-09
109	ZIA ULLAH	NAIZ MOHAMMAD	HAV-08	HC-09
110	RIAZ KHAN	KACHKOOL KHAN	HAV-08	HC-09
		MOHAMMAD		
111	SADAM KHAN	ANWAR	HAV-08	HC-09
112	M. ZAHIR KHAN	MALANG	HAV-08	HC-09
113	GUL SAID	LAL MOHAMMAD	HAV-08	HC-09
114	HAROON SHAH	SHAH HUSSAIN	HAV-08	HC-09
115	NAZRAF KHAN	ZIARA GUL	HAV-08	HC-09
116	IMRAN KHAN	FARAS KHAN	HAV-08	HC-09
117	MOHAMMAD ARIF	ABDUL MALIK	HAV-08	HC-09
118	AKHTAR HUSSAIN	ABDUL HAKEEM	HAV-08	HC-09
119	MOHAMMAD AYAZ	IHSANULLAH	HAV-08	HC-09
		MOHAMMAD		
120	AMJAD ALI	RAHIM	HAV-08	HC-09
121	IFTIKHAR	FARHAD KHAN	HAV-08	HC-09
	SHAH MOHAMMAD			
122	KHAN	MOHAMMAD ISHAQ	HAV-08	HC-09
123	AFTAB AHMAD	AMANULLAH	HAV-08	HC-09
124	MUSLIM KHAN	FAQIR	HAV-08	HC-09
125	IBRAHIM KHAN	MALIK SALEEM	HAV-08	HC-09
126	MURAD KHAN	SHER ALI	HAV-08	HC-09
127	GULZAR ALI	SAID AMIN	Naik-07	LHC-07
128	RAMBIL KHAN	SWAT KHAN	Naik-07	LHC-07
129	AZIZ-UR REHMAN	AVDUL MATIN	Naik-07	LHC-07
130	SHAID KHAN	MUMTAZ KHAN	Naik-07	LHC-07
131	JANGRIZ KHAN	KHASTA RAHMAN	Naik-07	LHC-07
132	MUSHTAQ AHMAD	ZEWAR KHAN	Naik-07	LHC-07
133	SAJAD AHMAD	GUL SUFAID	Naik-07	LHC-07
134	NAVEED KHAN	ALAIM KHAN	Naik-07	LHC-07
135	NASR ULLAH	MOHAMMAD ALI	Naik-07	LHC-07
	ZAHEER			
136	MOHAMMAD	NAIK MOHAMMAD	Naik-07	LHC-07
137	JAMAL SHAH	IQBAL KJAN	Naik-07	LHC-07
138	SHAUKAT ALI	GOHAR ALI	Naik-07	LHC-07
139	SHAKIR	ATTA SAID	Naik-07	LHC-07
140	ALI SHAN	UMAR KHAN	Naik-07	LHC-07
141	RAHMAN ULLAH	TOOR GUL	Naik-07	LHC-07
142	RIAZ KHAN	ZAMIR GUL	Naik-07	LHC-07
143	REHMAT ULLAH	SHAHNAWAZ	Naik-07	LHC-07
144	IBRAHIM	TAJAWAL	Naik-07	LHC-07
145	M.ISRAIL KHAN	MOHAMMAD	Naik-07	LHC-07

23

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
		HUSSAIN		
146	SHER KHAN	FATHI KHAN	Naik-07	LHC-07
147	AFSAR ALI	GUL WALI	Naik-07	LHC-07
148	ARSHAD KHAN	MOMIN KHAN	Naik-07	LHC-07
149	AJAB NOOR	TARIQ	Naik-07	LHC-07
150	WASEEM AKRAM	ITBAR JAN	Naik-07	LHC-07
151	RAJA MOHAMMAD	BAKHMAL SHAH	Naik-07	LHC-07
152	HAMEED ULLAH	SAMINULLAH	Naik-07	LHC-07
153	ZAHEEN SHAH	AMANULLAH	Naik-07	LHC-07
154	MOHAMMAD SADIQ	SHER ALI	Naik-07	LHC-07
155	ISSA KHAN	SHER AFZAL	Naik-07	LHC-07
156	MOMIN KHAN	ALI KHAN	Naik-07	LHC-07
157	ABDUR REHMAN	SABAZ ALI	Naik-07	LHC-07
158	AMJID KHAN	IQBAL KHAN	Naik-07	LHC-07
159	SAID AZAM	SHER ALAM	Naik-07	LHC-07
160	MUZAMAIL SHAH	SHAH ALI	Naik-07	LHC-07
161	IJAZ AHMAD	SHAMSUR REHMAN	Naik-07	LHC-07
162	RAHMAT ULLAH	NOOR JAMAL	Naik-07	LHC-07
	MOHAMMAD			
163	TAYYUB	ABDUL HAKEEM	Naik-07	LHC-07
164	MOHAMMAD ARIF	SALIMAN	Naik-07	LHC-07
165	ATTAI KHAN	SAID GHANI	Naik-07	LHC-07
166	NIMAT ULLAH	BAKH SHAH ALI	Naik-07	LHC-07
167	TAJ MOHAMMAD	SIMAT KHAN	Naik-07	LHC-07
168	ABDUR REHMAN	NASIR KHAN	Naik-07	LHC-07
169	ABDULLAH	OBAIDULLAH	Naik-07	LHC-07
170	JEWAN KHAN	RAIS KHAN	Naik-07	LHC-07
171	ZAR SHAD	SHAH SAID	Naik-07	LHC-07
172	KALAM ULLAH	GUL KHAN	Naik-07	LHC-07
173	ZAHIR JAN	NOOR SAID	Naik-07	LHC-07
174	SAMIN KHAN	MISRI SHER	Naik-07	LHC-07
175	FARMAN ULLAH	RAHMAN JAN	Naik-07	LHC-07
176	IMTIAZ KHAN	AMIR ZADA	Naik-07	LHC-07
177	BANARAS KHAN	RAHIM	Naik-07	LHC-07
178	QADEEM KHAN	WAZIR KHAN	Naik-07	LHC-07
179	KHAIL MOHAMMAD	INZAR GUL	Naik-07	LHC-07
	HUSSAIN	WAZIR		
180	MOHAMMAD	MOHAMMAD	Naik-07	LHC-07
181	MUBARAS KHAN	BANAT SHAH	Naik-07	LHC-07
182	IMDAD KHAN	IBADAT SHER	Naik-07	LHC-07
183	MOHAMMAD IRSHAD	HUSSAIN	Naik-07	LHC-07
184	SAFIRULLAH	KHAN ZAMAN	Naik-07	LHC-07
185	ZAR BADSHSH	KIHTAB GUL	Naik-07	LHC-07
186	SHAH FISAL	IZZAT GUL	Naik-07	LHC-07
187	HABIB ULLAH	GUL ALAM	Naik-07	LHC-07
188	IKRAM KHAN	AHMAD GUL	Naik-07	LHC-07

AT [Signature]

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
273	GULTAN KHAN	HUKAM KHAN	L/ Naik-06	FC-07
274	MOHAMMAD AWAIS	NOOR ZAHID	L/ Naik-06	FC-07
275	IRSHAD KHAN	ZAHIR SHAH	L/ Naik-06	FC-07
276	UMAR ZADA	KHAN ZADA	L/ Naik-06	FC-07
277	FALAK NIAZ	BISMILLAH	L/ Naik-06	FC-07
278	AMANAT KHAN	SHAD MOHAMMAD	L/ Naik-06	FC-07
279	RIAZ ALI	NIAZ MOHAMMAD	L/ Naik-06	FC-07
280	HAJI MOHAMMAD	TAJ MOHAMMAD	L/ Naik-06	FC-07
281	ZAKIR ULLAH	IOBAL SHAH	L/ Naik-06	FC-07
282	JEHAN ZEB	SWAB KHAN	L/ Naik-06	FC-07
283	IMRAN	ROHUL AMIN	L/ Naik-06	FC-07
284	MIAN NOOR	TARIQ KHAN	L/ Naik-06	FC-07
285	ISLAM GUL	AJAB GUL	L/ Naik-06	FC-07
286	YAD WALI	ZAHIR SHAH	L/ Naik-06	FC-07
287	ZAR MOHSIN	SHER KHAN	L/ Naik-06	FC-07
288	ALAM KHAN	AHMAD GUL	L/ Naik-06	FC-07
289	ZABIT KHAN	NOOR KHAN	L/ Naik-06	FC-07
290	BAKHT NAWAZ	BISMILLAH	L/ Naik-06	FC-07
291	MOHAMMAD KHAN	AKBAR SHAH	L/ Naik-06	FC-07
292	ARSHAD KHAN	SHAH NAWAZ	L/ Naik-06	FC-07
293	TAHIR ULLAH	TAJ MOHAMMAD	L/ Naik-06	FC-07
294	NIAMAT ULLAH	MUNIR KHAN	L/ Naik-06	FC-07
295	NAWAZ KHAN	LAL MAIDAR KHAN	L/ Naik-06	FC-07
296	BAGHI SHAH	AKBAR SHAH	L/ Naik-06	FC-07
297	SARFARAZ KHAN	JAMDAD KHAN	L/ Naik-06	FC-07
298	MOHAMMD KHAN	AMIR KALAM	L/ Naik-06	FC-07
299	KHANA WADA	HUSSAIN KHAN	L/ Naik-06	FC-07
300	MOHAMMD QASIM	ISLAM KHAN	L/ Naik-06	FC-07
301	NAUSHAD ALI	SEEMULLAH	L/ Naik-06	FC-07
302	JAMSHID KHAN	AJMAL	L/ Naik-06	FC-07
303	HASHAM	YOUSAF KHAN	L/ Naik-06	FC-07
304	ZAHID KHAN	GUL ZADA	L/ Naik-06	FC-07
305	JAMAL KHAN	LAL MOHAMMAD	L/ Naik-06	FC-07
306	HAYAT KHAN	AZIZ UR REHMAN	L/ Naik-06	FC-07
307	Hazrat Khan	MUSA JAN	L/ Naik-06	FC-07
308	TAJ MOHAMMAD	BAHDAR KHAN	L/ Naik-06	FC-07
309	JAN ALAM	ADAM KHAN	L/ Naik-06	FC-07
310	SAHEE JAN	IZAT GUL	L/ Naik-06	FC-07
311	GHULAM MOHAMMAD	KHISTA MOHAMMAD	L/ Naik-06	FC-07
312	NAWAB	NAZAR DIN	L/ Naik-06	FC-07
313	SHAMS-UR REHMAN	HAZRAT DIN	L/ Naik-06	FC-07
314	SARDAR GUL	NABI GUL	L/ Naik-06	FC-07
315	MASHOOQ	GUL AKBAR	L/ Naik-06	FC-07
316	MOHAMMAD SIRAJ	SAHIB ZADA	L/ Naik-06	FC-07

25

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
232	YASIN KHAN	LAL MOHAMMAD	L/ Naik-06	FC-07
233	RABAZ KHAN	ABDAR KHAN	L/ Naik-06	FC-07
234	NOOR-UL BASHAR	IMDAD KHAN	L/ Naik-06	FC-07
235	MOHAMMAD RAFIQ	FAZAL SUBHAN	L/ Naik-06	FC-07
236	RAFIQ KHAN	AJAM KHAN	L/ Naik-06	FC-07
237	AZIZ KHAN	MISAL KHAN	L/ Naik-06	FC-07
238	SHAHZAD HUSSAIN	INAM SAID	L/ Naik-06	FC-07
239	RAZI KHAN	ATBAR KHAN	L/ Naik-06	FC-07
240	AMAN ULLAH	SHAHTY GUL	L/ Naik-06	FC-07
241	YAR MOHAMMAD SAID	SULTAN SAID	L/ Naik-06	FC-07
242	YASIN KHAN	GUE MALIK	L/ Naik-06	FC-07
243	HABIB SAID	SAID GHANI	L/ Naik-06	FC-07
244	ADAM KHAN	ITBAR KHAN	L/ Naik-06	FC-07
245	MINA GUL	HAJI REHMAN	L/ Naik-06	FC-07
246	ABDUR RAZIQ	MOHABAT KHAN	L/ Naik-06	FC-07
247	SAID-UR REHMAN	ZAHIR KHAN	L/ Naik-06	FC-07
248	ZAHIR ULLAH	GRAN KHAN	L/ Naik-06	FC-07
249	SALIMAN KHAN	NAIZ MIN SAID	L/ Naik-06	FC-07
250	IZZAT KHAN	INAYAT KHAN	L/ Naik-06	FC-07
251	NAEEM KHAN	ASAL KHAN	L/ Naik-06	FC-07
252	ABNI AMIN	LAL NOOR	L/ Naik-06	FC-07
253	JANIS KHAN	NADAR SHER	L/ Naik-06	FC-07
254	AFSAN KHAN	AKBAR SAID	L/ Naik-06	FC-07
255	SAEED-UR- REHMAN	SHER BAHDAR	L/ Naik-06	FC-07
256	JEHAN ZEB	SHEROZ KHAN	L/ Naik-06	FC-07
257	MUSTAQIM KHAN	MOHAMMAD ALAM	L/ Naik-06	FC-07
258	IKRAM KHAN	SALIMAN	L/ Naik-06	FC-07
259	MOHAMMAD ISHAQ	SAHAIB ZADA	L/ Naik-06	FC-07
260	FARID ULLAH	MOHAMMAD FAROOQ	L/ Naik-06	FC-07
261	MOHAMMAD KAMRAN	SAKHI KHAN	L/ Naik-06	FC-07
262	NASIR AFRIDI	LAJBAR KHAN	L/ Naik-06	FC-07
263	BAKHTI GUL	MOHAMMAD GHANI	L/ Naik-06	FC-07
264	ALAM SAID	MIR MOHAMMAD SAID	L/ Naik-06	FC-07
265	TARIQ KHAN	HISADAR	L/ Naik-06	FC-07
266	ZAKIR KHAN	ZIARAT KHAN	L/ Naik-06	FC-07
267	ABDULLAH	KAMIN KHAN	L/ Naik-06	FC-07
268	SHAFIQ ULLAH	LAL BAHADAR	L/ Naik-06	FC-07
269	SYD RAZA SHAH	MALIK DIN	L/ Naik-06	FC-07
270	MOHAMMAD HAYAT	KHAN SAHIB	L/ Naik-06	FC-07
271	BASWAR KHAN	AKBAR KHAN	L/ Naik-06	FC-07
272	RAMDAD KHAN	TAIWAL	L/ Naik-06	FC-07

ADJUSTED

24

S.#	NAME	FATHER'S NAME	PREVIOUS RANK	RANK IN WHICH ABSORBED
189	NIZAM KHAN	PEERZADA	Naik-07	LHC-07
190	HAJI REHMAN	AJMIR KHAN	Naik-07	LHC-07
191	ARIF ALI	MOHAMMAD SHAH	Naik-07	LHC-07
192	ASAF KHAN	SHAKOR KHAN	Naik-07	LHC-07
193	ABDUL SAEED	AMIN DAD	Naik-07	LHC-07
194	MIRZA ALI	IZAT GUL	Naik-07	LHC-07
195	MOHAMMAD JAMIL	ABDUL GHAFAR	Naik-07	LHC-07
196	WAJID KHAN	HAMZAULLAH	Naik-07	LHC-07
197	SHERAZ KHAN	RUKHAN	Naik-07	LHC-07
198	FAIZ-UR REHMAN	REHMAN	Naik-07	LHC-07
199	JABBIR SHAH	FARAZ KHAN	Naik-07	LHC-07
200	SADIQ SHAH	MOHAMMAD NAZIR	Naik-07	LHC-07
201	TAWAB	DAD KHAN	Naik-07	LHC-07
202	SAFIR KHAN	NADAR KHAN	Naik-07	LHC-07
203	BAKHTAIR KHAN	DILAWAR KHAN	Naik-07	LHC-07
204	GOHAR KHAN	SAID KHAN	Naik-07	LHC-07
205	FARHAD KHAN	KHAN AWAZAL	Naik-07	LHC-07
206	ILTAF HUSSAIN	MOHAMMAD HUSSAIN	Naik-07	LHC-07
207	IMTIAZ KHAN	KHAIL POOR	Naik-07	LHC-07
208	INZAMAM KHAN	KHAIL POOR	Naik-07	LHC-07
209	NOOR ULLAH	TOOR GUL	Naik-07	LHC-07
210	MOHAMMAD RAZIQ	MOHAMMAD NOOR	Naik-07	LHC-07
211	SAJJAD ALI	KHWAJA MOHAMMAD	Naik-07	LHC-07
212	IILYAS KHAN	HASSAN KHAN	Naik-07	LHC-07
213	AKHTAR GUL	RAWALI KHAN	Naik-07	LHC-07
214	MAHBOOB ALAM	BAWAR SHER	Naik-07	LHC-07
215	ABDUR RAZIQ	NAWAB GUL	Naik-07	LHC-07
216	KALIM ULLAH	GHULAM HABIB	Naik-07	LHC-07
217	DOST MOHAMMAD	AMIN KHAN	Naik-07	LHC-07
218	AYAZ KHAN	SARTAJ KAHN	Naik-07	LHC-07
219	IBRAHIM	BISMULLAH JAN	L/ Naik-06	FC-07
220	HAYAT KHAN	ZAFAR KHAN	L/ Naik-06	FC-07
221	HUSSAIN KHAN	NASEEM KHAN	L/ Naik-06	FC-07
222	AFTAB HUSSAIN	HAZRAT HUSSAIN	L/ Naik-06	FC-07
223	KABIR KHAN	MUZAFFAR KHAN	L/ Naik-06	FC-07
224	NAZIR KHAN	NOORAB KHAN	L/ Naik-06	FC-07
225	NAJEEB ULLAH	RAHAT GUL	L/ Naik-06	FC-07
226	MOHAMMAD RIAZ	AMIRZADA KHAN	L/ Naik-06	FC-07
227	MURSALEEN	IOBAL KHAN	L/ Naik-06	FC-07
228	SARDAR KHAN	AMIRZADA	L/ Naik-06	FC-07
229	FARMAN ULLAH	MIR WALI	L/ Naik-06	FC-07
230	SARTAJ KHAN	GHUNCHA GUL	L/ Naik-06	FC-07
231	MASAM KHAN	MANDA KHAN	L/ Naik-06	FC-07

ATTACHED

(27)

2. The above absorption shall be subject to the following terms and conditions:

- (i) Their services shall be governed under the Khyber Pakhtunkhwa Police Act, 2017 and the rules made thereunder.
- (ii) A member shall not be entitled for absorption, if he has resigned from Levies Force Service or has been terminated from the Service ibid on account of misconduct, inefficiency or any other grounds or has been retired from Service under the Federal Levy Force (Amended) Service Rules 2013, before commencement of the Khyber Pakhtunkhwa Levies Force Act, 2019 (Khyber Pakhtunkhwa Act No. XXXV of 2019).
- (iii) Their services shall be considered regular and they shall be eligible for pension and deduction of General Provident fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).
- (iv) Their seniority shall be determined in accordance with rule 6 of the Levies Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.
- (v) They shall undergo training as provided in rule 5 of Levies Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019.

Secretary

to Government of the Khyber Pakhtunkhwa
Home and Tribal Affairs Department

No. & date even.

CC to:

1. Inspector General of Police, Khyber Pakhtunkhwa.
2. Accountant General Khyber Pakhtunkhwa.
3. Regional Police Officer, Mardan
4. District Police Officer Mohmand Tribal District.
5. Deputy Commissioner Mohmand Tribal District
6. PS to Chief Secretary Government of Khyber Pakhtunkhwa
7. PS to Secretary, Home & TAs Department, Khyber Pakhtunkhwa.
8. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa.
9. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa
10. Manager Printing Press for notifying the same in the official gazette.
11. Office record file.

Section Officer (Levies & Khasadars)

D, (28)

ORDER.

In the backdrop of order issued by the Central Police Office, Peshawar vide No. 380-403/NMD dated 18.08.2023 according to para-6 of the order ibid, Ex-Levies and Ex-Khasardars absorbed in Khyber Pakhtunkhwa, Police through notifications issued by the Home & Tribal Affairs Department Khyber Pakhtunkhwa from time to time under the provisions of Levies Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019 and the Khasardars Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019.

Hence, in light of above order, the following Assistant Sub Inspectors of Mohmand District whose names alongwith their respective ranks as well as date of birth duly forwarded by District Police Officer, Mohmand vide letter No. 838/EC dated 31.08.2023, are hereby confirmed in their respective ranks from the date of issuance of their absorption Notifications. They are also allotted Region Numbers as noted against each:-

S. No.	Name	Date of Birth	Date of absorption	Date of confirmation as ASI	Date of entry to list 'E'	Regional Number
1.	Bashar Ali Sher	01-01-1988	11-02-2020	11-02-2020	11-02-2020	992/MR
2.	All Murad Khan	10-12-1987	11-02-2020	11-02-2020	11-02-2020	993/MR
3.	Haji Muhammad	1972	11-02-2020	11-02-2020	11-02-2020	994/MR
4.	Fazli Zahir	01-03-1972	11-02-2020	11-02-2020	11-02-2020	995/MR
5.	Mir Afzal	12-03-1977	11-02-2020	11-02-2020	11-02-2020	996/MR
6.	Noor Zamin	13-03-1982	11-02-2020	11-02-2020	11-02-2020	996/MR
7.	Mohabat Shah	19-04-1982	11-02-2020	11-02-2020	11-02-2020	997/R
8.	Rahim Gul	21-05-1982	11-02-2020	11-02-2020	11-02-2020	998/MR
9.	Akbar Shah	23-11-1982	11-02-2020	11-02-2020	11-02-2020	999/MR
10.	Fida Mohammad	01.01.1983	11-02-2020	11-02-2020	11-02-2020	1000/MR
11.	Musharraf Khan	01-01-1983	11-02-2020	11-02-2020	11-02-2020	1001/MR
12.	Shad Ali	01-02-1983	11-02-2020	11-02-2020	11-02-2020	1002/MR
13.	Shah Room	03.04.1983	11-02-2020	11-02-2020	11-02-2020	1003/MR
14.	Nadir Khan	01-07-1983	11-02-2020	11-02-2020	11-02-2020	1004/MR
15.	Khalid Khan	13-08-1983	11-02-2020	11-02-2020	11-02-2020	1005/MR
16.	Naeem Khan	04-11-1983	11-02-2020	11-02-2020	11-02-2020	1006/MR
17.	Gul Shakir	04-01-1984	11-02-2020	11-02-2020	11-02-2020	1007/MR
18.	Fazal Haq	16-02-1984	11-02-2020	11-02-2020	11-02-2020	1008/MR
19.	Salim Khan	13-11-1984	11-02-2020	11-02-2020	11-02-2020	1009/MR
20.	Sohail Mohammad	13-11-1984	11-02-2020	11-02-2020	11-02-2020	1110/MR
21.	Said Jan	03-02-1985	11-02-2020	11-02-2020	11-02-2020	1111/MR
22.	Najeeb Khan	15-04-1985	11-02-2020	11-02-2020	11-02-2020	1112/MR
23.	Wajid Ali	01-07-1985	11-02-2020	11-02-2020	11-02-2020	1113/MR
24.	Rehman Khan	02-01-1986	11-02-2020	11-02-2020	11-02-2020	1114/MR
25.	Hussain Khan	03-02-1986	11-02-2020	11-02-2020	11-02-2020	1115/MR
26.	Arshad Khan	23-06-1986	11-02-2020	11-02-2020	11-02-2020	1116/MR
27.	Shah Said	08-04-1987	11-02-2020	11-02-2020	11-02-2020	1117/MR
28.	Mohammad Ihsan	20-02-1988	11-02-2020	11-02-2020	11-02-2020	1118/MR
29.	All Far Shah	13-05-1988	11-02-2020	11-02-2020	11-02-2020	1119/MR
						1120/MR

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29

33.	Bakhat Mohammad	05-10-1993	11-02-2020	11-02-2020	11-02-2020	1124/MR
34.	Reza Mohammad	02-02-1994	11-02-2020	11-02-2020	11-02-2020	1125/MR
35.	Zahir Gul	22-02-1994	11-02-2020	11-02-2020	11-02-2020	1126/MR
36.	Aizaz Ali Shah	09-09-1996	11-02-2020	11-02-2020	11-02-2020	1127/MR
37.	Pir Mohammad	16-02-1997	11-02-2020	11-02-2020	11-02-2020	1128/MR
38.	Ajmal Khan	07-04-1997	11-02-2020	11-02-2020	11-02-2020	1129/MR
39.	Tajawal Khan	01-01-1974	23-07-2020	23-07-2020	23-07-2020	1130/MR
40.	Maqsood Khan	01-01-1984	23-07-2020	23-07-2020	23-07-2020	1131/MR
41.	Muhammad Ishaq	05-01-1999	23-07-2020	23-07-2020	23-07-2020	1132/MR
42.	Amad Ali	18-03-1999	23-07-2020	23-07-2020	23-07-2020	1133/MR
43.	Munsif Khan	05-08-2001	23-07-2020	23-07-2020	23-07-2020	1134/MR
44.	Ubaid Ullah	17-09-1993	07-05-2021	07-05-2021	07-05-2021	1135/MR

Necessary Gazette Notification may be issued accordingly.

(MUHAMMAD SOLEMAN) PSP
Regional Police Officer,
Mardan.

No. 7801 /ES,

Dated Mardan the 28/11/2023.

Copy forwarded for information and necessary action to the:-

1. Chief Secretary Government of Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhwa, Home and Tribal Affairs Department, Peshawar.
3. Principal Secretary to Chief Minister, Government of Khyber Pakhtunkhwa, Peshawar.
4. Secretary to the Government of Khyber Pakhtunkhwa, Law, Parliamentary Affairs and Human Rights Department Peshawar.
5. Secretary to the Government of Khyber Pakhtunkhwa, Finance Department, Peshawar.
6. Accountant General of Khyber Pakhtunkhwa Peshawar.
7. Additional Inspector General of Police, Investigation, Khyber Pakhtunkhwa, Peshawar.
8. Additional Inspector General of Police, Elite Force, Khyber Pakhtunkhwa, Peshawar.
9. Additional Inspector General of Police, Operations, Khyber Pakhtunkhwa, Peshawar.
10. Additional Inspector General of Police, Headquarters, Khyber Pakhtunkhwa, Peshawar.
11. Additional Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawar.
12. Additional Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.
13. All District Police Officers, in Mardan Region.
14. All Superintendents of Police Investigation, in Mardan Region.
15. ACR Clerk Region Office, Mardan.

(*****)

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30

To,

The Worthy
Inspector General of Police
KPK, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 28/11/2023 TO THE EXTENT OF SERIAL NO 36 IZAZ ALI SHAH AND SERIAL NO 38 AJMAL KHAN, WHEREBY THEY HAVE BEEN PROMOTED/ CONFIRMED BEING JUNIOR TO THE APPELLANTS.

Respected Sir,

- 1- That the appellants are the employees of your good-self department and are serving as Head Constables (BPS-09) since their appointments till date, quite efficiently and upto the entire satisfaction of their superiors.
- 2- That the appellants through notification dated 11/02/2020 have been absorbed in Police Department from Levies Force Mohmand as Head Constables (BPS-09).
- 3- That similarly above named persons are also absorbed through notification dated 11/02/2020 from Khasadar Force Mohmand into Police Department as FC (BPS-07).
- 4- That through impugned notification dated 28/11/2020, the above named persons have been confirmed as Assistant Sub Inspectors, despite the fact that both are juniors to the appellants, but illegally and without adopting proper procedure for their promotion and confirmation, ignored seniors colleagues without any reason and justification.
- 5- That appellants aggrieved from the impugned notification, being illegal and against the Police Rules, preferred the instant Departmental Appeal before your honor inter alia on the following grounds:- (Copies of Relevant Record Attached)

Grounds:

- A) That the impugned order being contrary to law and rules and in utter violation of the law on the subject hence not tenable in the eye of Law.
- B) That appellants have not been treated by the department concerned in accordance with law and rules on the subject noted above and as such action of the respondent department is violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C) That the impugned notification is also violative of the Police Rules.

- D) That the treatment meted-out to the appellants is a clear violation of the Fundamental Rights of the appellants as enshrined in the Constitution of Pakistan 1973.
- E) That while issuing the impugned notification, the appellants being seniors from above mentioned persons, ignored and they have been promoted/confirmed.
- F) That neither the above mentioned persons are enlisted in the concerned list of ASI, nor any Departmental Promotion Committee (DPC) conducted before issuing the impugned notification.
- G) That the impugned notification is also violative of APT Rules.
- H) That the impugned notification is also against the Articles 38-E of the Constitution of Islamic Republic of Pakistan, 1973.

It is, therefore, most humbly requested that on acceptance of this Departmental Appeal, impugned notification may very kindly be set aside to the extent of Serial No 36 Izaz Ali Shah & Serial No 38 Ajmal Khan, whereby they have been promoted/ confirmed being junior to the appellants and without conducting proper DPC.

Dated: ___/01/2024

Yours Obediently

Rashid

① Roman Khan HC No-10
Police Ghallani Mohmmud. 0348-868407

Sardar Wali

② Sardar Wali HC No 01
P.S Prang Ghor

Muhammad

③ Mohammad Xousaf HC-91
Police line Ghallani -0344-26520

Mujahid Khan

④ Mujahid Khan HC No-2
Police Station Ghallani

Muhammad

⑤ Murad Khan HC 03

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO. _____/2024

MR. MUHAMMAD YOUSAF VS POLICE DEPARTMENT

KNOW ALL to whom these presents shall come that I the undersigned appoint: *Umar Farooq*

Mohmand, Advocate High Court, Peshawar (herein after called the advocate) to be the Advocate for the Mr. Muhammad Yousaf, Head Constable (BPS-09) Police Line Ghallani, District Mohmand in the above mentioned case, to do all the following acts, deeds and things or any of them, that is to say :

- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross-objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
- 3) To withdraw or compromise in the said case or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- 4) To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
- 5) To engage any other Legal practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

AND I hereby agree not to hold the Advocate or its substitute responsible for the result of the said case and in consequence of his absence from the court when the said case is called up for hearing

AND I hereby that in the event of the whole or any part of the fee agreed by me to be paid to the Advocate remaining unpaid, He shall be entitled to withdraw from the prosecution of the said case until the same is paid.

IN WITNESS WHEREOF I hereunto set my hand to these presents the contents of which have been explained to and understood by me, this ____th day of March, 2024

Accepted By



Umar Farooq Mohmand,

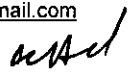
Advocate High Court, Peshawar.

Bar Council No:- 14-4822


CNIC No:- 17102-7315460-3

Cell No:- 0313-8901647

Email: umf7890@gmail.com


Waleed Adnan

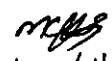
Advocate High Court, Peshawar.


Mahmood Jan

Advocate High Court, Peshawar.


Khanzad Gul

Advocate High Court, Peshawar.


Signature/ thumb impression
of party / parties.