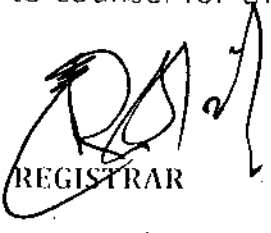


Form-A

FORM OF ORDERSHEET

Court of _____

Case No. 744/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	31.05.2024	<p>As per verbal direction of the Hon'ble Member Judicial the present appeal is fixed for preliminary hearing before Single Bench at Peshawar on 04.06.2024. Parcha Peshi given to counsel for the appellant.</p> <p style="text-align: right;"> REGISTRAR</p>



Respected Madam,

It is submitted that the present appeal was received on 23.05.2024, which was returned to the counsel for the appellant for removing objections (Flag-A) within 15 days. The appeal was to be resubmitted on 9.05.2024. Today i.e. on 30.05.2024 the learned counsel for the appellant re-filed the same late by 20 days without removing the objection No.8 with a note in shape of reply (Flag-B).

The appeal is submitted to your Honour under rule-7(c) of Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.


REGISTRAR 31/5/24

Hon'ble Member -J.

157) That Para 1 and 5 considered to be deleted after the submission of the appeal.

③ Affidavit is duly attested by both Commissioners.

④ That all the annexures of the appeal are attested.

⑤ That address of the appellant be completed.

⑥ That has been checked with annexure marks.

⑦ That check list is fill up.

⑧ That departmental appeal has been filed before the Inspector General of Police who has been inserted as Respondent no 1.

⑨ Copies of the minutes of the held in the year 2011 and June 2010 are not available, as these are not provided to appellant, even the appellant have filed an application before the Information Commissioner in 2012 & 2013 to provide the minutes of the 2011 and June-2010, but despite Information Commissioner is attached on Page 52 of the appeal.

⑩ That Provision Page 18 now is deleted that better copy of Provision Page 18 now is provide.

⑪ That better copy of Provision Page 20 now 21 is provide.

30/1/24

The file/appeal is submitted as per the
removal of all allegations


That letter copy of previous page 30 now 31 is
also provide
(10) That copies has been provided as per para 10 of the
allegations

The appeal of Mr. Ghalib Shah received today i.e on 23.04.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1 & 5 are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- ✓ Affidavit is not attested by the Oath Commissioner.
- 3- ✓ Annexures of the appeal are unattested.
- 4- ✓ Address of appellant is incomplete be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 5- ✓ Appeal has not been flagged/marked with annexures marks.
- 6- ✓ Check list attached with the appeal is blank.
- 7- ✓ The authority to whom the departmental appeal was made has not been made a necessary party.
- 8- ✓ Copies of minutes of the DPC meeting held in the years 2014 & 2020 mentioned in the heading of appeal are not attached with the appeal be placed on it.
- 9- ✓ Pages nos. 12, 16, 17, 20 & 30 of the appeal are illegible be replaced by legible/better one.
- 10- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent be submitted with the appeal.

No. 952 /S.T,

Dt. 24/4 /2024.


24/4/24
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Ihsan ur Rehman Adv.
High Court Peshawar.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A. 7694 /2024


Ghalib Shah
VERSUS
Govt of KP & Others

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S#	Description of Documents	Annex	Pages
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Dated: 06/005/2024

Appellant
Through


Ihsan Ur Rehman
Advocate, High Court,
Peshawar.

①

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

A. No 744/2024

Ghalib Shah Head Constable No. (220/650) S/o
Shah Baz Khan R/o Village Qasim District
Nowshera presently Special Branch Nowshera.

.....Appellant

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Khyber Pakhtunkhwa, Peshawar.
3. Additional IGP Headquarter for Provincial Police Officer of Khyber Pakhtunkhwa, Peshawar.
4. Deputy Inspector General of Police, Mardan Region.
5. Deputy Inspector General of Police, Special Branch, Peshawar.

.....Respondents

**APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST THE ORDER WITH REGARD
TO DEPARTMENTAL PROMOTION
COMMITTEE HELD BY RESPONDENT N.2 IN
THE YEAR JUNE 2020, PESHAWAR AND
DEPARTMENTAL PROMOTION COMMITTEE
HELD BY RESPONDENT NO.4 MARDAN IN
THE YEAR 2014 WHEREBY IN BOTH OF
THE DPC THE APPELLANT HAS BEEN
IGNORE AND OTHER COLLEAGUE WHO GOT
COMPLETED THEIR INTER COURSE IN THE
YEAR 2013 HAS BEEN PROMOTED TO THE
POST OF ASI**

①

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Ghalib Shah Head Constable No. (220/650) S/o
Shah Baz Khan R/o Qasim District Nowshera.

.....Appellant
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diry No. 12359

Dated 23/4/24

1. Government of Khyber Pakhtunkhwa through
Chief Secretary KPK.
- 2. Capital City Police Officer, Khyber Pakhtunkhwa,
Peshawar.
3. Additional IGP Headquarter for Provincial Police
Officer of Khyber Pakhtunkhwa, Peshawar.
- ✓ 4. Deputy Inspector General of Police, Mardan
Region.
5. Deputy Inspector General of Police, Special
Branch, Peshawar.

.....Respondents

Filed to-day

Registrar

**APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST THE ORDER WITH REGARD
TO DEPARTMENTAL PROMOTION
COMMITTEE HELD BY RESPONDENT N.2 IN
THE YEAR JUNE 2020, PESHAWAR AND
DEPARTMENTAL PROMOTION COMMITTEE
HELD BY RESPONDENT NO.4 MARDAN IN
THE YEAR 2014 WHEREBY IN BOTH OF
THE DPC THE APPELLANT HAS BEEN
IGNORE AND OTHER COLLEAGUE WHO GOT
COMPLETED THEIR INTER COURSE IN THE
YEAR 2013 HAS BEEN PROMOTED TO THE
POST OF ASI.**

19

PRAYER:

ON ACCEPTNCE OF THIS APPEAL THE APPELLANT MAY BE PROMOTED / TREATED AT PAR AS OTHER COLLEAGUES AND HIS SENIORITY MAY BE COUNTED / GRANTED SINCE 2020 ON THE STRENGTH OF PESHAWAR FOR THE SAKE OF JUSTICE ALONG WITH ALL BACK BENEFITS. FURTHER ALSO TO DETERMINE THE SERVICE STATUS OF THE APPELLANT THAT WHETHER THE APPELLANT COME IN THE JURISDICTION OF DIG RANGE PESHAWAR OR D.I.G RANGE MARDAN.

Respectfully Sheweth,

That the Appellant humbly submits as under:-

1. That appellant No.220/650 was initially appointed as Constable on 12.03.1991 at District Nowshera, since then performing his official duty to the best of his ability and to the entire satisfaction of the superior without any complaint.
2. That the appellant was deputed for Intermediate College Course to Hangu Training School in the year 2013 and after qualifying the same the appellant was sent back to District Mardan on 20.09.2013 as a qualified recruit & his name was

(3)

brought on list D for further promotion as per Notification No. 1743/Es dated 31.03.2014, according to the order of Seniority w.e.f 20/09/2013 with his other colleagues. (Copy of Order is attached as Annexure "A").

3. That in the year 2014, a meeting of departmental promotion committee held in Mardan, in which other colleagues belong to District Mardan, Nowshera, Swabi and Charsadda who completed his inter training in 20.09.2013 has been promoted to the post of ASI, whereas the appellant was ignored and not been promoted to the post of ASI like other colleagues. (Copy of Nowshera list is attached as Annexure "B")
4. That in the year 2014 at Peshawar, the DPC was held, in that DPC also other colleagues of the appellant were promoted / upgraded to the post of ASI, but again the appellant is not promoted.
5. That again in the year June 2020 another DPC was held in Peshawar, but in the very DPC also other colleagues who has got completed their inter course along with appellant in the year 2013 were promoted, but the appellant again was not treated on the same footing as other colleagues and a

④

discriminative attitude was adopted by the concern authority towards the appellant. (Copy of Peshawar List is attached as Annexure "C")

6. That as most of the junior to the appellant have been promoted on the strength of Mardan belonging to different districts in the DPC 2014 and also on the strength of Peshawar since 2014 to 2020 but the appellant has been malafidely ignored without any reason which is discrimination on the part of respondents.
7. That again DPC held in June 2020 at Peshawar, the appellant submitted an application on the next day to CCPO Peshawar on 15/07/2020 by agitating the grievances, that the appellant is neither promoted on the strength of Mardan and neither over the strength of Peshawar which is discrimination on the part of Respondent No. 4 & 2 but in vain. (Copy of Application is attached as Annexure "D")
8. That than after the appellant was informed that the name of appellant No. 220/650 qualified Head Constable placed on promotion List-D of Mardan Region inadvertently vide his office Notification No. 2053/E dated 08.04.2014 was transferred from Mardan Region to Chief Capital Police Peshawar

and his name hereby remove from Promotion List - D. (Copy of Removal Order is attached as Annexure "E")

9. That the Additional IGP Headquarter/ Respondent No.3 for provincial police officer KPK Peshawar issue an Order in which IHC's and ASI's were promoted and deputed to different places in which the petitioner on Serial No. 23 of Nowshera List has been deputed to Special Branch and now the petitioner performing his duty in special branch under Respondent No.5. (Copy of Order is attached as Annexure "F")
10. That already the said appeal No. 382 of 2023 was pending before this Hon'ble Tribunal and some comments were also be submitted by the respondents but vide Order dated 12/12/2023 the Hon'ble Chairman of the Tribunal issue a direction to the appellant to file a departmental appeal before the concern authority and after fulfilment of the needful a fresh appeal may be submitted. (Copy of Departmental Appeal along with Order Sheet Dated 12/12/2023 are annexure "G & H")
11. That now the appellant as aggrieved from both of the orders of June 2020 by the Respondent No.2

⑧

and the order of 2014 by Respondent No.4 approached this Hon'ble Tribunal by the following inter alia:-

Grounds:

- A. That by not promoting the appellant to the post of ASI by the Respondent No. 2 and 4 in DPC held in 2020 at Peshawar and also by the Respondent No.4 in the DPC held at Mardan Region is against the fact, law and rules.
- B. That not treated the appellant on the same footing as other colleagues by the respondent No.2 and also against the natural justice.
- C. That the attitude of Respondents is also against the norms of maxim, that everyone is equal before law.
- D. That the appellant has been condemned unheard and not been treated according to law and rules.
- E. That the discriminative attitude of respondents towards the appellant is also against the law and rules.
- F. That other relevant grounds will be discussed with prior permission of this August Tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal, the Respondents may be issued an appropriate direction to promote/

(7)

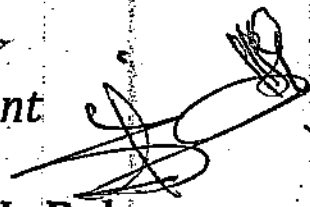
treat the appellant at par as other colleagues and his seniority may be counted/ granted since June 2020 on the strength of Peshawar for the sake of justice along with all back benefits and also to determine the service status of the appellant that whether the appellant come in the jurisdiction of D.I.G range Peshawar or D.I.G range Mardan.

Any other relief not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.

Dated: 23-04-2024.


Appellant

Through


Ihsan Ur Rehman
Advocate, High Court,
Peshawar.

(18)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A. /2024

**Ghalib Shah
VERSUS
Govt of KP & Others**

AFFIDAVIT

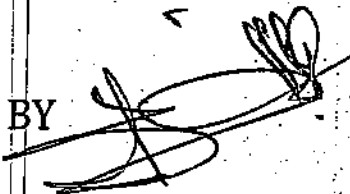
I, Ghalib Shah Head Constable No. (220/650) S/o Shab Baz Khan R/o Qasim District Nowshera, do hereby solemnly affirm & declare on oath that all content of the instant Service Appeal, are true & correct to the best of my knowledge & belief and nothing has been concealed or misstated from this Hon'ble Tribunal.

DEPONENT

CNIC: 17201-9394578-7

Cell No: 0333-7251976

Identified BY



Ihsan Ur Rehman
Advocate, High Court,
Peshawar

(9)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A. _____/2024

Ghalib Shah
VERSUS
Govt of KP & Others

ADDRESSES OF PARTIES

APPELLANT


Ghalib Shah Head Constable No. (220/650) S/o
Shah Baz Khan R/o Qasim District Nowshera

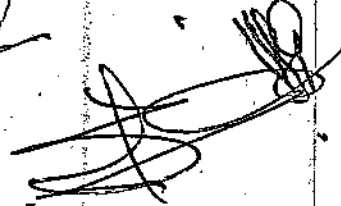
ADDRESSES OF RESPONDENTS

1. Government of Khyber Pakhtunkhwa through
Chief Secretary KPK.
2. Capital City Police Officer, Khyber Pakhtunkhwa,
Peshawar.
3. Additional IGP Headquarter for Provincial Police
Officer of Khyber Pakhtunkhwa, Peshawar.
4. Deputy Inspector General of Police, Mardan
Region.
5. Deputy Inspector General of Police, Special
Branch, Peshawar.

Dated: ___/04/2024

Through


Appellant


Ihsan Ur Rehman
Advocate High Court,
Peshawar

(10)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A _____/2024

Ghalib Shah
VERSUS
Govt of KP & Others

APPLICATION FOR CONDONATION OF DELAY (IF ANY)

Respectfully Sheweth:

Petitioner submits as under:-

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.

Grounds:

1. That the impugned order is void and illegal and no limitation run against the void orders because the impugned order has been passed without fulfilling the codal formalities.
2. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.
3. That there are many judgment of the Superior Courts as well as specific provision in service law that in case of promotion, seniority financial matter no limitation has been run against that.

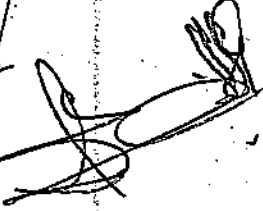
4. That the impugned order is also void because it has been passed from the retrospective effect as well as passed by incompetent authority.

It is, therefore, requested that the limitation period (if any) may kindly be condoned in the interest of justice.

Dated: 22/04/2024


Appellant

Through


Ihsan Ur Rehman
Advocate, High Court,
Peshawar.

POLICE DEPARTMENT

MARDAN REGION.

FOR PUBLICATION IN THE KHYBER PUKHTUNKHAWA POLICE GAZETTE
PART-II.

ORDER BY THE DEPUTY INSPECTOR GENERAL OF POLICE MARDAN
REGION-I, MARDAN.

NOTIFICATION.

Dated. 08/07/2014

No. 1743/ES, PROMOTION TO LIST D:- In continuation of this of
notification No. 1743/ES dated 31.03.2014, the name of Head Constable Ghali Sh
No. 220 of Nowshera District Police who had qualified Intermediate College Cou
for the term ending 20.09.2013 is hereby brought on promotion list ~~and~~ according
order of seniority with effect from 20.09.2013 with his colleagues.


(MUIHAMMAD SAEED) PSP
Deputy Inspector General of Police
Mardan Region-I, Mardan.

No. 2052-54/ES,

Copy to the:-

- 1) Additional Inspector General of Police, Investigation Khyber
Pukhtunkhwa Peshawar alongwith 02 spare copies for publication.
- 2) District Police Officer, Nowshera. } For information and
- 3) PA to DIG, Region Office, Mardan. } necessary action.

(MUIHAMMAD SAEED) PSP
Deputy Inspector General of Police
Mardan Region-I, Mardan.

Attested


Annexure B
 (10) (13)

2-4-33

قائم زیر قاعدہ ۷۸ (۱) ای لئی ایسٹونیا
 نامیئل رول برائے Pre-Service کوئسٹ

محکمہ پولیس

نام کڑوں انٹرمیڈیٹ فرم آواز 01-04-2013

نمبر شمار	نام	پلاٹ نمبر	رجسٹر (ممبر)	ولدیت	گاہن اعلم	سکونت مقام	تعمیل	سکونت نسل	میراثی نسل اربن	کیپولر نسل نیشنل کارڈ	بلڈ گروپ	کمراتیڈی	تعلیم	تاریخ کمراتیڈی	تاریخ پیدائش	قد	چھاتی	علا (کڑوں)
1	کافیٹ اللہ	1049	پیدائشی	شاگردت	سوانی نسل کماں	کواں	نوشہرہ	نوشہرہ	FRP پٹنار	17201-2219008-9	B+	03459326609	B.A	06-07-94	05-08-70	5-7	34x35	پیدائشی
2	میرزا شہزاد	220	پیدائشی	شیرین نعت	اسرار علی بیگ	پہی	نوشہرہ	نوشہرہ	نوشہرہ	17201-9314578-7		03337251976	10th	12-03-91	05-01-73	5-9	34x35	پیدائشی
3	سرمیاں	366	پیدائشی	انزلی	بیر برکے	رما پور	نوشہرہ	نوشہرہ	نوشہرہ	17201-2221550-7		03339024349	10th	22-02-94	07-04-75	5-9 1/2	34x35	پیدائشی
4	نوشہرہ	828	پیدائشی	سہ فریہ	نوشہرہ	انسان نسل	نوشہرہ	نوشہرہ	نوشہرہ	17201-2285944-5	B+	03339018896	F.A	10-07-91	05-04-70	5-7	33x34	پیدائشی
5	نوشہرہ	1034	پیدائشی	نوشہرہ	ڈاکٹر سید	پہی	نوشہرہ	نوشہرہ	FRP پٹنار	17201-2297197-5	O+	03139803547	B.A	27-04-95	05-02-70	5-7	33x34	پیدائشی

OFFICE OF THE DISTRICT POLICE OFFICER NOWSHERA

No. 3632-33 /EC, Dated Nowhsera the

Copy forwarded for information & necessary action to the:-

1. Addl: Inspector General of Police /Commandant RTC Hangu.
2. Capital City Police Officer, Peshawar.
3. Deputy Inspector General of Police, NH&MP N-5(North) Islamabad.

District Police Officer
 Nowshera

Attested

- S.No
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Ikra
Sajee
Muhan
Ghani u.
Liagat Ali
M. hamma
Asmat Ullah
Ehzaz Ahmao
Shaukat Ali No.
Altat Gul No. 51
Khan Alam No. 4
Zahoor ur Rehman
Alam Zeb No. 4338
Muzamail Shah
Bakha

ICE DEPARTMENT.

Annexure 14
CAPITAL CITY POLICE, PESHAWAR.

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II,
ORDERS BY THE CAPITAL CITY POLICE OFFICERS, PESHAWAR.


NOTIFICATION.

Dated Peshawar the 18/09/2014.


No. 5085 /EC-I, PROMOTION LIST. The following Head Constables of Capital City Police Peshawar including CPC University Campus, Peshawar have completed the Immediate College Course during the term ending 20-09-2013 at Police Training College Hangu. Their names are hereby brought on promotion list "D" with effect from 20-09-2013 according to PTC Hangu result/merit:-

S.No	Name & Numbers	District/Unit.
1.	Mushtaq Ahmad No. 2432	CCP, Peshawar
2.	Muhammad Hussain No. 1058	CCP, Peshawar
3.	Khan Dad Khan No. 3424	CCP, Peshawar
4.	Nazir-ul-Islam No. 3520	CCP, Peshawar
5.	Ikram Ullah No. 4366	CCP, Peshawar
6.	Sajeed Gul No. 583	CCP, Peshawar
7.	Muhammad Arshad No. 370	CCP, Peshawar
9.	Ghani ur Rahman No. 2734	CCP, Peshawar
10.	Liakat Ali No. 3962	CCP, Peshawar
10.	Muhammad Younas No. 3811	Special Branch
11.	Asmat Ullah No. 91	CCP, Peshawar
12.	Ehzaz Ahmad No. 153	CPC, Peshawar
13.	Shaukat Ali No. 4466	CCP, Peshawar
14.	Aitaf Gul No. 5112	CCP, Peshawar
15.	Khan Alam No. 4437	CCP, Peshawar
16.	Zahoor ur Rehman No. 1693	CCP, Peshawar
17.	Alam Zeb No. 4338	CCP, Peshawar
18.	Muzamail Shah No. 49	CCP, Peshawar
19.	Bakhar E Alam No. 3830	CCP, Peshawar
20.	Izhar Ullah No. 1374	CCP, Peshawar
21.	Syed Sajawal Shah No 4140	CCP, Peshawar
22.	Wali ur Rehman No. 217	CPC, Peshawar
23.	Muhammad Saeed No. 142	CCP, Peshawar
24.	Sajjad Gul No. 3248/2931	CCP, Peshawar
25.	Muhammad Amin No. 4002	CCP, Peshawar
26.	Noor Ul Basar No. 1580/440	CCP, Peshawar
27.	Najik Muhammad No. 4404/3456	CCP, Peshawar
28.	Sher Rahman No. 2615	CCP, Peshawar

D list notification

Attested


	Fazal Gul No. 217	CCP, Peshawar
30.	Ibrar Ullah No. 34	CPC, Peshawar
31.	Qadir Khan No. 58	CCP, Peshawar
32.	S.Tahir Shah No. 328/4386	CPC, Peshawar
33.	Aziz Ullah No. 1615	CCP, Peshawar
34.	Muhammad Tariq No. 2864	CCP, Peshawar
35.	Shah Alam No. 1678	CCP, Peshawar
36.	Bawar Khan No. 4013	CCP, Peshawar
37.	Muhammad Hayat No. 254	CCP, Peshawar
38.	Fazal Subhan No. 274	CCP, Peshawar
39.	Aurang Zeb No. 3764	CCP, Peshawar
40.	Said Ismail Shah No. 2636	CCP, Peshawar
41.	Qurban Ali No. 413	CCP, Peshawar
42.	Haider Ali No. 559	CCP, Peshawar
43.	Syed Sajid Ali Shah No. 118/42	CPC, Peshawar
44.	Nasr Ullah No. 184	CPC, Peshawar.
45.	Sadaqat Ullah No. 4385	CCP, Peshawar.


CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No. 3086-97/EC-I,

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

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Additional Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar with two spare copies for publication in Police Gazette Part-II.
3. The Deputy Inspector General of Police, Mardan Region-I, Mardan. Please issue "D" list notification of the passed candidates of Districts Charsadda and Nowshera. Photo copy of their selection is enclosed for perusal.
4. The SSP/Operations, Investigation & Traffic, Peshawar.
5. Commandant CPC University Campus, Peshawar.
6. The SP/HQs: Peshawar.
7. EC-II, CRC, OASI, AS.



D list notification



Handwritten notes in the top left corner, including a small circular diagram and some illegible text.

Handwritten text: 15.9.2020

Handwritten signature or name in the top right area.

Handwritten text: EC for N/A

Large handwritten text in the middle section, including the number 650 and some illegible words.

Handwritten text: 15-7-2020

Main body of handwritten text, appearing to be a list or series of notes, mostly illegible due to cursive and bleed-through.

Handwritten text at the bottom left, including a circled number 1 and some illegible words.

Annexure E
④

POLICE DEPARTMENT

FOR PUBLICATION IN THE KHYBER PAKHUNJRA POLICE DEPARTMENT
PART-II.

ORDER BY THE REGIONAL POLICE OFFICER, MARDAN.

NOTIFICATION.

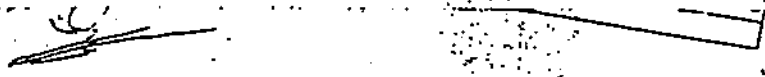
No. 3035 /ES, REMOVAL FROM PROMOTION LIST D, The name of Intermediate College Course qualified Head Constable Ghulam Shah No. 220330 placed on promotion list D of Mardan Region inadvertently was the effect of notification No: 2053-54/ES dated 08.04.2014 as his name was transferred from Mardan Region to Capital City Police, Peshawar on his own signature prior to the issuance of notification ibid, is hereby removed from promotion list D.

Regional Police Officer
Mardan.

CC.

- 1) Capital City Police Officer, Peshawar vide his office letter No: 2060/EC dated 03.12.2020 followed by reminder No: 1116/EC-I dated 13.01.2021 in necessary action as mentioned vide your above quoted reference.
- 2) District Police Officer, Nowshera.
- 3) ACR Clerk Region Office, Mardan.

Attested

BETTER COPY NO.

(17)

POLICE DEPARTMENT

MARDAN REGION

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE
GAZETTE PART-II

NOTIFICATION

No. 3335/ES, REMOVAL FROM PROMOTION LIST D. The name of Intermediate College Course qualified Head Constable Ghalib Shah No. 220/350 placed on promotion list 'D' of Mardan Region inadvertently vide this office notification No. 2053-54/ES dated 08.04.2014 as his lien was transferred from Mardan Region to Capital City Police, Peshawar on his own sweat will, prior to the issuance of notification ibid, is hereby removed from promotion list 'D'.

CC.

- 1) Capital City Police Officer, Peshawar vide his office letter No. 2050/EC-I dated 03.12.2020 followed by reminder No. 1116/EC-I dated 15.01.2021 for necessary action as mentioned vide your above quoted reference.
- 2) District Police Officer, Nowshera.
- 3) ACR Clerk Region Office, Mardan

Attested
[Signature]

ORDER

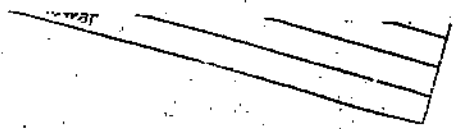
Amir
R-173

Consequent upon detachment of district Charsadda and Nowshera from CCP, Peshawar and attachment with Mardan Region (in the following IHCs, ASIs and JAs serving in Charsadda and Nowshera districts) on their option attached with Capital City ~~Police Station Mardan Region~~ against their names for the purpose of their ~~promotions~~ effect.

S/No	Name & Rank	Lien attached to
Charsadda District		
1.	IHC Abdur Rasheed 282	CCP/Peshawar
2.	IHC Haseenullah 522	CCP/Peshawar
3.	IHC Iftikhar Hussain 589	CCP/Peshawar
4.	IHC Ghafoor Khan 543	CCP/Peshawar
5.	IHC Shaukat Ali 5441	CCP/Peshawar
6.	IHC Qasim Shah 1000	CCP/Peshawar
7.	IHC Khan Wali Shah 792	CCP/Peshawar
8.	IHC Wajid Ali 537	CCP/Peshawar
9.	IHC Iqbal Wahid 790	CCP/Peshawar
10.	IHC Saad Malook 8	CCP/Peshawar
11.	IHC Qaisar Khan 198	CCP/Peshawar
12.	IHC Shafiullah 274	CCP/Peshawar
13.	IHC Muhammad Ayub Jan 322	CCP/Peshawar
14.	IHC Tariq Menmood 188	CCP/Peshawar
15.	IHC Bakhtawar Shah 809	Mardan Region
16.	IHC Fazle Khalique 434	CCP/Peshawar
17.	IHC Gul Nabi 999	CCP/Peshawar
18.	IHC Imtiaz Ali Shah 251	CCP/Peshawar
19.	IHC Fazal Maula 599	CCP/Peshawar
20.	IHC Faqir Jan 154	CCP/Peshawar
21.	IHC Johar Ali 734	CCP/Peshawar
22.	IHC Shaukat Ali 885	CCP/Peshawar
23.	IHC Muhammad Ishraq 542	CCP/Peshawar
24.	IHC Muhammad Israr 516/644	CCP/Peshawar
25.	IHC Marjan Ali 396	CCP/Peshawar
26.	IHC Sher Bad Shah 888	CCP/Peshawar
27.	IHC Akhtar Gul 979	CCP/Peshawar
28.	IHC Shahid Irfan 956	CCP/Peshawar
29.	IHC Farooq Shah 804	CCP/Peshawar
30.	IHC Nasir Ali 1132	CCP/Peshawar
31.	IHC Ajmeer Shah 841	CCP/Peshawar
32.	IHC Zaidullah 947	CCP/Peshawar
33.	IHC Apeel Jan 1082	CCP/Peshawar
34.	IHC Fazal Wahid 899/542	CCP/Peshawar
35.	IHC Ali Khan 126	CCP/Peshawar
36.	IHC Qamar Khan 907	CCP/Peshawar
37.	IHC Lal Bad Shah 968	CCP/Peshawar
38.	IHC Amjad Ali 447	CCP/Peshawar
39.	IHC Muzilaz 951	CCP/Peshawar
40.	IHC Abdul Raheer Khan 1067	CCP/Peshawar
41.	IHC ...	CCP/Peshawar
42.	IHC ...	CCP/Peshawar
43.	IHC Yahya Khan 1683	CCP/Peshawar

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Page 4

Attested
[Signature]



BETTER COPY NO.

18

ORDER:

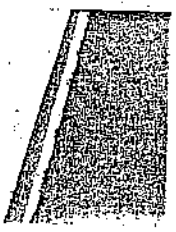
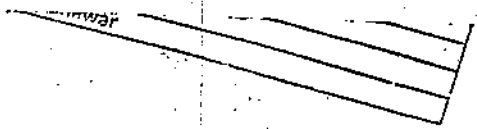
Consequent upon detachment of district Charsadda and Nowshera from CCP, Peshawar and attachment with Mardan Region lien of the following IHCs, ASIs and SIs serving in Charsadda and Nowshera district, on their option attached with Capital City Police/ Mardan Region as noted against their names for purpose of their promotion with immediate effect.

S/No	Name & Rank	Lien attached to
1.	IHC Abdur Rasheed 282	CCP/Peshawar
2.	IHC Haseenullah 522	CCP/Peshawar
3.	IHC Iftikhar Hussain 589	CCP/Peshawar
4.	IHC Ghafoor Khan 543	CCP/Peshawar
5.	IHC Shaukat Ali 544	CCP/Peshawar
6.	IHC Qasim Shah 1000	CCP/Peshawar
7.	IHC Khan Wali Shah 792	CCP/Peshawar
8.	IHC Wajid Ali 537	CCP/Peshawar
9.	IHC Iqbal Wahid 790	CCP/Peshawar
10.	IHC Saad Malook 8	CCP/Peshawar
11.	IHC Qaisar Khan 198	CCP/Peshawar
12.	IHC Shafiullah 274	CCP/Peshawar
13.	IHC Muhammad Ayub Jan 322	CCP/Peshawar
14.	IHC Tariq Mehmood 188	CCP/Peshawar
15.	IHC Bakhtawar Shah 809	CCP/Peshawar
16.	IHC Fazle Khalif 434	CCP/Peshawar
17.	IHC Gul Nabi 999	CCP/Peshawar
18.	IHC Imtiaz Ali Shah 251	CCP/Peshawar
19.	IHC Fazal Maula 599	CCP/Peshawar
20.	IHC Faqir Jan 154	CCP/Peshawar
21.	IHC Johar Ali 734	CCP/Peshawar
22.	IHC Shaukat Ali 885	CCP/Peshawar
23.	IHC Muhammad Ishaq 542	CCP/Peshawar
24.	IHC Muhammad Israr 516/644	CCP/Peshawar
25.	IHC Marjan Ali 396	CCP/Peshawar
26.	IHC Sher Badshah 888	CCP/Peshawar
27.	IHC Akhtar Gul 979	CCP/Peshawar
28.	IHC Sharif Irfan 956	CCP/Peshawar
29.	IHC Farooq Shah 894	CCP/Peshawar
30.	IHC Nasir Ali 1132	CCP/Peshawar
31.	IHC Ajmeer Shah 841	CCP/Peshawar
32.	IHC Zaidullah 947	CCP/Peshawar
33.	IHC Apeel Jan 1082	CCP/Peshawar
34.	IHC Fazal Wahid 899/542	CCP/Peshawar
35.	IHC Ali Khan 126	CCP/Peshawar
36.	IHC Qamar Khan 907	CCP/Peshawar
37.	IHC Lal Bad Shah 968	CCP/Peshawar
38.	IHC Amjad Ali 447	CCP/Peshawar
39.	IHC Mumtaz 951	CCP/Peshawar
40.	IHC Abdul Kabeer Khan 1087	CCP/Peshawar
41.		
42.		
43.	IHC Yahya Khan 1083	CCP/Peshawar

Ali S. J. P.

44.	IHC Momin Khan 431	CCP/Peshawar
45.	IHC Jehanzeb 38	CCP/Peshawar
46.	IHC Wali Muhammad 1188	CCP/Peshawar
47.	IHC Saleem Jan 109	CCP/Peshawar
48.	IHC Arshad ullah 709	CCP/Peshawar
49.	IHC Mujeeb ur Rehman 1160	CCP/Peshawar
50.	IHC Baitullah 770	CCP/Peshawar
51.	IHC Muhammad Javed 813	CCP/Peshawar
52.	ASI Shad Muhammad 1116/P	CCP/Peshawar
53.	ASI Sardar Ahmed 1117/P	CCP/Peshawar
54.	ASI Muhammad Ayaz 1119/P	CCP/Peshawar
55.	ASI Muhammad Hayat 1120/P	CCP/Peshawar
56.	ASI Muhammad Ismail 1122/P	CCP/Peshawar
57.	ASI Muhammad Javed 1126/P	CCP/Peshawar
58.	ASI Hassan Khan 1128/P	CCP/Peshawar
59.	ASI Bahar Ahmed 1229/P	CCP/Peshawar
60.	ASI Ziaullah 1133/P	CCP/Peshawar
61.	ASI Yahya Shah 1136/P	CCP/Peshawar
62.	ASI Ali Jan 1137/P	CCP/Peshawar
63.	ASI Jafar Shah 10/P	CCP/Peshawar
64.	ASI Jamshed Khan 11/P	CCP/Peshawar
65.	ASI Murad Ali 1144/P	CCP/Peshawar
66.	ASI Itbar Shah 1146/P	CCP/Peshawar
67.	ASI Hayatullah 1148/P	CCP/Peshawar
68.	ASI Muhammad Riaz 1149/P	CCP/Peshawar
69.	ASI Sangeen Khan 1159/P	CCP/Peshawar
70.	ASI Liaqat Ali 1151/P	CCP/Peshawar
71.	ASI Gulshed Ali 1152/CHD	CCP/Peshawar
72.	ASI Rizwanullah 1154/P	CCP/Peshawar
73.	ASI Hayat Muhammad 1157/P	CCP/Peshawar
74.	ASI Younis Ali 1158/P	CCP/Peshawar
75.	ASI Fazal Dayan 1164/P	CCP/Peshawar
76.	ASI Shakirullah 1165/P	CCP/Peshawar
77.	ASI Wilayat Khan 1166/P	CCP/Peshawar
78.	ASI Fazal Rokhan 04	CCP/Peshawar
79.	ASI Riaz Muhammad 1170/P	CCP/Peshawar
80.	ASI Mukaram Shah 1169/P	CCP/Peshawar
81.	ASI Tilawat Shah 1171/P	CCP/Peshawar
82.	ASI Muneer Khan 1173/P	CCP/Peshawar
83.	ASI Samiullah 1174/P	CCP/Peshawar
84.	ASI Muhammad Ibrar 1176/P	Mardan Region
85.	ASI Hassan Gul 1179/P	CCP/Peshawar
86.	ASI Sitwar Khan 1180/P	CCP/Peshawar
87.	ASI Asghar Ali 1182/P	CCP/Peshawar
88.	ASI Habibullah 1183/P	CCP/Peshawar
89.	ASI Shujaat Khan 1185/P	CCP/Peshawar
90.	ASI Ihsanullah 1187/P	CCP/Peshawar
91.	ASI Murad Ali 72	CCP/Peshawar
92.	ASI Ghafirullah 1073/P	CCP/Peshawar
93.	ASI Gafar Ali 1188/P	CCP/Peshawar
94.	ASI Nasrullah 1191/P	CCP/Peshawar
95.	ASI Masood Khan 1191/P	CCP/Peshawar
96.	ASI Said Umar 1192/P	CCP/Peshawar
97.	ASI Fazal Badshah 1193/P	CCP/Peshawar
98.	ASI Farid Shah 1194/P	CCP/Peshawar
99.	ASI Humayun 1197/P	CCP/Peshawar
100.	ASI Tehseenullah 1202/P	CCP/Peshawar

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20

101.	ASI Zahidullah 1216/P	CCP/Peshawar
102.	ASI Subhanullah 1225/P	CCP/Peshawar
103.	ASI Yahya Jan 1246/P	CCP/Peshawar
104.	ASI Iftikhar Ali 1302/P	CCP/Peshawar
105.	ASI Muhammad Naseer 608/CH	CCP/Peshawar
106.	ASI Saeed-ur-Rehman 1078/CA	CCP/Peshawar
107.	ASI Shaikat 159/CHd	CCP/Peshawar
108.	ASI Khwaja Muhammad 326/CA	CCP/Peshawar
109.	ASI Mukhtiar Khan 693	CCP/Peshawar
110.	ASI Nihar Gul 721/CA	CCP/Peshawar
111.	PASI Masood Jan 584/P	CCP/Peshawar
112.	PASI Rahmat Ullah 759/P	CCP/Peshawar
113.	PASI Imaran Ullah 751/P	CCP/Peshawar
114.	PASI Bilal Ullah 750/P	CCP/Peshawar
115.	PASI Bahar Ali 769/P	CCP/Peshawar
116.	PASI Tahir Ali Khan 740/P	CCP/Peshawar
117.	PASI Gohar Rehman 765/P	Mardan Region
118.	PASI Irfanullah 776/P	CCP/Peshawar
119.	PASI Naveed Gul 768/P	CCP/Peshawar
120.	PASI Asif Khan 771/P	CCP/Peshawar
121.	PASI Muhammad Ashfaq 796/P	CCP/Peshawar
122.	PASI Ashfaq Ahmad 775/P	CCP/Peshawar
123.	PASI Wariq Shah 32/P	CCP/Peshawar
124.	ASI Amir Dad	CCP/Peshawar
125.	SI Syar Muhammad	CCP/Peshawar
126.	SI Sabz Ali 102/P	CCP/Peshawar
127.	SI Ikramullah 81/P	CCP/Peshawar
128.	SI Farhad Ali 811	CCP/Peshawar
129.	SI Muhammad Rashid Khan 727/P	CCP/Peshawar
130.	SI Fazal Hadi 739/P	Mardan Region
131.	SI Ameer Rehman 8/MR	CCP/Peshawar
132.	SI Sarwar Khan 572/P	CCP/Peshawar
133.	SI Ajbbar Khan MR/149	CCP/Peshawar
134.	SI Ashraf Khan 468/P	CCP/Peshawar
135.	SI Khadim Shah 432	CCP/Peshawar
136.	SI Muhammad Zaman 618/P	CCP/Peshawar
137.	SI Salfullah 656/P	CCP/Peshawar
138.	SI Amir Nawaz Khan 662/P	CCP/Peshawar
139.	SI Fazal Subhan 877/P	Mardan Region
140.	SI Khurshed Khan 983/P	CCP/Peshawar
141.	SI Muhammad Fazil 886/P	CCP/Peshawar
142.	SI Jan Muhammad 979/P	CCP/Peshawar
143.	SI Zafar Khan 889/P	CCP/Peshawar
144.	SI Anwar Khan 694/CHD	CCP/Peshawar
145.	SI Muhammad Yonis 893/P	CCP/Peshawar
146.	SI Mushtaq Ali 902/P	CCP/Peshawar
147.	SI Qaisar Khan 920/P	CCP/Peshawar
148.	SI Kiramat Shah 919/P	CCP/Peshawar
149.	SI Sardar Hussain 918/P	CCP/Peshawar
150.	SI Hassan Khan 1128/P	CCP/Peshawar
151.	SI Gul Shed Ali 800/CHD	CCP/Peshawar
152.	SI Kausar Khan	Mardan Region
153.	SI Fazal Muhammad	CCP/Peshawar
NOWSHERA DISTRICT		
1.	IHC Naik Sar Ali 588	Mardan Region
2.	IHC Mirad Ali 640	CCP/Peshawar
3.	IHC Naseer Jelian 660	CCP/Peshawar

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21

9	IHC Ghaffar 770	Pranjalit M	CCP/Peshawar	
10	IHC Hussain Khan 785	Pranjalit M	CCP/Peshawar	
11	IHC Yaqub Bakhsh 795	Pranjalit M	CCP/Peshawar	
12	IHC Rizwan 805	Pranjalit M	CCP/Peshawar	
13	IHC Tahir Zamroz 815	Pranjalit M	CCP/Peshawar	
14	IHC Nasir Khan 825	Pranjalit M	CCP/Peshawar	
15	IHC Bari Kadir Khan 835	Pranjalit M	CCP/Peshawar	
16	IHC Usman Khan 845	Pranjalit M	CCP/Peshawar	
17	IHC Awal Khan 855	Pranjalit M	CCP/Peshawar	
18	IHC Waqar Ali 865	Pranjalit M	CCP/Peshawar	
19	IHC Saad Khan 875	Pranjalit M	CCP/Peshawar	
20	IHC Saad Khan 885	Pranjalit M	CCP/Peshawar	
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28	IHC Saad Khan 965	Pranjalit M	CCP/Peshawar	
29	IHC Saad Khan 975	Pranjalit M	CCP/Peshawar	
30	IHC Saad Khan 985	Pranjalit M	CCP/Peshawar	
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88	IHC Saad Khan 1565	Pranjalit M	CCP/Peshawar	
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93	IHC Saad Khan 1615	Pranjalit M	CCP/Peshawar	
94	IHC Saad Khan 1625	Pranjalit M	CCP/Peshawar	
95	IHC Saad Khan 1635	Pranjalit M	CCP/Peshawar	
96	IHC Saad Khan 1645	Pranjalit M	CCP/Peshawar	
97	IHC Saad Khan 1655	Pranjalit M	CCP/Peshawar	
98	IHC Saad Khan 1665	Pranjalit M	CCP/Peshawar	
99	IHC Saad Khan 1675	Pranjalit M	CCP/Peshawar	
100	IHC Saad Khan 1685	Pranjalit M	CCP/Peshawar	

کاتب

موردن

موردن

Atiqul
Q

Atiqul
CCP/Peshawar

Mordan Vicle P.Pc
No. 12225-E-175

BETTER COPY

(21)

S#	Name	
4	IHC Ghulam 710	CCP/Peshawar, Mardan
5	IHC Hussain Khan	CCP/Peshawar
6	IHC Yar Badshah 774	CCP/Peshawar
7	IHC Riazullah 884	CCP/Peshawar
8	IHC Tahir Zaman 828	CCP/Peshawar
9	IHC Naik Ahmad	CCP/Peshawar
10	IHC Baz Muhammad 1823	CCP/Peshawar
11	IHC Hasham Khan	CCP/Peshawar
12	IHC Awal Khan 878	CCP/Peshawar
13	IHC Wajid Khan 884	CCP/Peshawar
14	IHC Ifikhar	CCP/Peshawar
15	IHC Sartaj 915 DPC	CCP/Peshawar No. 8373-75/-
16	IHC Shahid Khan	CCP/Peshawar, Mardan
17	IHC Naeem Jan 18	CCP/Peshawar, Mardan
18	IHC Saeed Nabi Khan 59	CCP/Peshawar, Mardan
19	IHC Jamal 69 DPC	CCP/Peshawar
20	IHC Marjan Ali 85	CCP/Peshawar
21	IHC Javed Khan 166	CCP/Peshawar Mardan
22	IHC Sirajud. Din 215	CCP/Peshawar
23	IHC Ghalid Shah 220	CCP/Peshawar SB
24	IHC Zahoor Shah 522	CCP/Peshawar
25	IHC Mir Akbar 531	CCP/Peshawar Mardan Rider
26	IHC Hidayat Shah 539	CCP/Peshawar Mardan
27	IHC Umar Hayat 555 DPC	CCP/Peshawar
28	IHC Nasir Khan 924	CCP/Peshawar Mardan
29	IHC Hamish 929	CCP/Peshawar
30	IHC Umar Nasir 1029	CCP/Peshawar
31	IHC Kifayatullah 1049	CCP/Peshawar
32	IHC Asif 308	CCP/Peshawar Mardan
33	IHC Abdul Wahid 339	CCP/Peshawar
34	IHC AbdulReaz 408	CCP/Peshawar
35	IHC Munawar 420	CCP/Peshawar
36	IHC Zahid ur Rehman	CCP/Peshawar Mardan
37	IHC Sartaj 478	CCP/Peshawar Mardan
38	IHC Shakeel Ahmad 489 DPC	CCP/Peshawar
39	IHC Faizur Rehman 491 DPC	CCP/Peshawar
40	IHC Noor ulHaq 247	CCP/Peshawar Mardan
41	IHC Arshad 511	CCP/Peshawar Mardan Rider
42	IHC Marjan Ali 366	CCP/Peshawar
43	IHC Ramin 1032	CCP/Peshawar
44	IHC Amin Jan 19/848	CCP/Peshawar
45	IHC Shah Zeb 75/709	CCP/Peshawar
46	IHC Ayaz Mehmood 147	CCP/Peshawar
47	IHC Saleem Khan 17	CCP/Peshawar
48	ASI Yaseen 1552/35	CCP/Peshawar
49	PASI Hafeez ur Rehman	CCP/Peshawar
50	PASI Akhtar Naseer 580	CCP/Peshawar
51	PASI Inamullah 581/P	CCP/Peshawar
52	PASI Fazal Akbar 1010/P	CCP/Peshawar
53	PASI Muhammad Asim 389/P	CCP/Peshawar
54	ASI ImdadUllah 1137/P	CCP/Peshawar
55	ASI Muhammad Nawaz 1114/2	CCP/Peshawar
56	ASI Ghulam Sarwar	CCP/Peshawar
57	ASI Syed Muhammad Hanif 1118/P	Mardan Region
58	ASI Said Qamar 1/21/P	Mardan Region
59	ASI Muhammad Ismail 1/22/P	CCP/Peshawar
60	ASI Muhammad Naeem 1123/P	CCP/Peshawar

A/1/20/18

(92)

61.	ASI Bashirullah 1124/P	CCP/Peshawar
62.	ASI Wailyat Khan 1127/P	CCP/Peshawar
63.	ASI Sajawal 1130/P	CCP/Peshawar
64.	ASI Karimdad 1131/P	CCP/Peshawar
65.	ASI Muhammad Tahir 1132/P	CCP/Peshawar
66.	ASI Zardad Ali 1134/P	CCP/Peshawar
67.	ASI Bitadar R/P	CCP/Peshawar
68.	ASI Ijaz Nabi 1144/MR	CCP/Peshawar
69.	ASI Bahader Sher 1139/P	CCP/Peshawar
70.	ASI Safdar Ali 1142/P	CCP/Peshawar
71.	ASI Umair Khan 1145/P	CCP/Peshawar
72.	ASI Muhammad Ashfaq 1147/P	CCP/Peshawar
73.	ASI Ghulam Ali 1150/P	CCP/Peshawar
74.	ASI Farman Gul 1155/P	CCP/Peshawar
75.	ASI Muhammad Naz 1156/P	CCP/Peshawar
76.	ASI Sangeen 1159/P	CCP/Peshawar
77.	ASI Jamshid Khan 1163/P	CCP/Peshawar
78.	ASI Shakirullah 1165/P	CCP/Peshawar
79.	ASI Inayat ur Rehman 1368/P	CCP/Peshawar
80.	ASI Saleem Khan 1175/P	CCP/Peshawar
81.	ASI Muhammad Alam 1181/P	CCP/Peshawar
82.	ASI Tabraiz 1184/P	CCP/Peshawar
83.	ASI Sher Muhammad 1186/P	CCP/Peshawar
84.	ASI Fayaz Muhammad 1190/P	CCP/Peshawar
85.	ASI Itlikhar Hussain 1195/P	CCP/Peshawar
86.	ASI Muhammad Ibrahim 1196/P	CCP/Peshawar
87.	ASI Yahya Jun 1246/P	CCP/Peshawar
88.	ASI Ihsan ul Haq No. 1264/P	CCP/Peshawar
89.	ASI Muhammad Saeed 1297/P	CCP/Peshawar
90.	ASI Muhammad Israr	CCP/Peshawar
91.	PASI Wisal Ahmed 753/P	CCP/Peshawar
92.	ASI Jehanzeb 78	CCP/Peshawar
93.	ASI Shiragh Shah 943	CCP/Peshawar
94.	ASI Sher Bahadar 947	CCP/Peshawar
95.	ASI Sajid Iqbal 1047	CCP/Peshawar
96.	PASI Inayat Ali Amjad 108/B	CCP/Peshawar
97.	PASI Muhammad Ayaz 797/B	CCP/Peshawar
98.	ASI Zia-ud-Din 564	CCP/Peshawar
99.	ASI Hidayatullah 52	Mardan Region
100.	ASI Murad 85	CCP/Peshawar
101.	PASI Abdul Wali 752/P	Mardan Region
102.	PASI Asghar 802/P	CCP/Peshawar
103.	PASI Adil Saeed 801/P	CCP/Peshawar
104.	PASI Waqas-Yousaf 798/P	CCP/Peshawar
105.	ASI Irshad Ali 611	CCP/Peshawar
106.	ASI Muhammad Tayib	CCP/Peshawar
107.	SI Ihsan-ur-Rehman 872/P	CCP/Peshawar
108.	SI Hazrat Ali 914/P	CCP/Peshawar
109.	SI Muhammad Qayum 905/P	CCP/Peshawar
110.	SI Anwar Ali 950	CCP/Peshawar
111.	SI Jehanzeb 190/MR	CCP/Peshawar
112.	SI Abdul Wahab 589/P	CCP/Peshawar
113.	SI Muhammad Naseem 867/P	CCP/Peshawar
114.	SI Bakhtaj Khan 649/P	Mardan Region
115.	SI Muhammad Jamal	CCP/Peshawar
116.	SI Behroz 888/P	CCP/Peshawar
117.	SI Faqee Muhammad 654/P	CCP/Peshawar

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	118.	SI Jehanzeb 1063	Mardan Region
	119.	SI Khat Nawaz 901/P	CCP/Peshawar
Retire	120.	SI Shamshad 812/P	CCP/Peshawar
	121.	SI Fazil Shah 345/P	CCP/Peshawar
Retire	122.	SI Umair Saif 743/P	Mardan Region
	123.	SI Mawar Khan 653/P	CCP/Peshawar
Retire	124.	SI Nek Zaman 965/P	Mardan Region
	125.	SI Hanifullah 590/P	Mardan Region
Retire	126.	SI Saif Ahmed 738/P	Mardan Region
	127.	SI Abdul Dyan 571/P	Mardan Region
Retire	128.	SI Inayat Ali 626/P	Mardan Region
	129.	SI Khan Bahadur 741/P	Mardan Region
	130.	SI Muhammad Yousof 582/P	CCP/Peshawar
	131.	SI Amir Zaman 570/P	Mardan Region
Retire	132.	SI Abdur Rauf 917/P	CCP/Peshawar
	133.	SI Geemat Bali 203	Mardan Region
	134.	SI Dadan Khan 195/MR	CCP Peshawar
Retire	135.	SI Fawad Khan	Mardan Region
	136.	SI Javed Khan	Mardan Region
	137.	SI Saleem No. 749/P	Mardan Region
Retire	138.	SI Madad Khan	CCP Peshawar
	139.	SI Andaz Khan	CCP Peshawar
	140.	SI Kiramat Shah	CCP Peshawar

6271
4-12-2013

Sd/-
KHALID MASOOD
Addl. IGP/Headquarters
For Provincial Police Officer
Khyber Pakhtunkhwa
Peshawar.

No. 29507-8 JE-II, dated Peshawar the 29/11/2013
Copy of above is forwarded for information and necessary

action to the:-

1. Addl. IGP/HQs Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer Peshawar w/r to his Memo: No. 160/6/- dated: 18.09.2013.
3. Deputy Inspector General of Police Mardan Region w/r to his Memo: 5381/ES, dated: 19.11.2013.
4. District Police Officers Mardan, Nowshera & Charsadda.

EC
in circulation
Attest

[Signature]
(SYED FIDA HASSA) SI
Addl. Establishm...
For Provincial Police...
Khyber Pakhtun...
Peshawar.

Annexure 4
(24)

**BEFORE THE INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA, PESHAWAR**

Ghalib Shah S/o Shah Baz Khan, Head Constable No. (220/650)
R/o Qasim District Nowshera.

**DEPARTMENTAL APPEAL AGAINST THE
ORDER OF DEPARTMENTAL
PROMOTION COMMITTEE HEADED BY
CAPITAL CITY POLICE OFFICER
KHYBER PAKHTUNKHWA, PESHAWAR
VIDE ORDER DATED JUNE 2020
WHEREBY THE PETITIONER HAS BEEN
IGNORE FOR PROMOTION TO THE POST
OF ASI.**

Respectfully Sheweth:

The Petitioner humbly submits as under:-

1. That Petitioner No. 220/650 was initially appointed as Constable on 12.03.1991 at District Nowshera, since then performing his official duty to the best of his ability and to the entire satisfaction of the superiors without any complaint.
2. That after the appointment the Petitioner was selected for the inter course and sent to Hangu Training School in the year 2013 and after qualifying the same, the petitioner was sent back to Mardan on 20-9-13 as a qualified recruit and also his name was brought on list (D) for further promotion as per notification No. 1743/ES dated 31-3-

2014, according to the order of seniority w.e.f 20-9-2013 with his other colleagues.

3. That in the year 2014, a meeting of DPC held in Mardan in which other colleagues belong to District Mardan, Nowshera, Swabi and Charsadda who completed their inter course in 20-9-2013 has been promoted to the post of ASI, whereas the petitioner was ignored and not been promoted to the post of ASI like other colleagues.
4. That again in 2014 another DPC was held in Peshawar, but in that very DPC other colleagues of the petitioner were promoted to the post of ASI, but again the petitioner was ignored.
5. That again in the year June 2020 another DPC was held in Peshawar, but in that very DPC also other colleagues who has got complete their inter course along with Petitioner in the year 2013 were promoted, but the petitioner again was not treated on the same footing as other colleagues and a discriminative attitude was adopted by the concern authority towards the petitioner.
6. That as most of the junior to the petitioner have been promoted on the strength of Mardan belonging to different districts in the DPC 2014 and also on the strength of Peshawar since 2014 to 2020 but the petitioner has been

(25)

malafidely ignored without any reason which is discrimination on the part of respondents.

7. That after DPC held in June 2020 at Peshawar the petitioner submitted an application to CCPO Peshawar on 15.07.2020 by agitating the grievances, that the petitioner is neither promoted on the strength of Mardan and neither over the strength of Peshawar which is discrimination on the part of CCPO Peshawar.
8. That than after the petitioner was informed that the name of petitioner No. 220/650 qualified Head Constable placed on promotion list-D. of Mardan Region inadvertently vide his office Notification NO. 2053/E dated 08.04.2014 was transferred from Mardan Region to Chief Capital Police Peshawar and his name hereby remove from promotion List D.
9. That the Additional IGP Headquarters for provincial police officer KPK Peshawar issue an order in which IHC's and ASI's was promoted and deputed to different places in which the petitioner on Serial No. 23 of Nowshera List has been deputed to Special Branch and now the petitioner performing his duty in Special Branch.

It is therefore, humbly prayed that on acceptance of this appeal, the petitioner may be promoted and treated

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as other colleagues who got completed their inter course
training in the year 2013.

Dated: 26/12/2023

Petitioner,

Ghalib Shah

Head Constable No. 220/650
Presently at Special Branch
R/o Village Qasim, Tehsil Pabbi
District Nowshera.

0333-7251976

Annexure - H
(23)

BEFORE THE HONBLE SERVICE TRIBUNAL
PESHAWAR



Appeal No. 382/2023

Ghalib Shah Head Constable No. (220/650) s/o Shab Baz Khan
R/o Qasim District Nowshera.

.....Petitioner

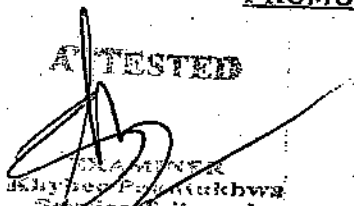
VERSUS

1. Govt. of Khyber Pakhtunkhwa through Chief Secretary KPK
2. Inspector General of Police Peshawar Khyber Pakhtunkhwa Peshawar.
3. Deputy Inspector General of Police Peshawar Region Peshawar.
4. Deputy Inspector General of Police Mardan Regic..
5. Deputy Inspector General of Police special branch Peshawar.

..... Respondents

APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA TRIBUNAL
ACT 1974 AGAINST THE ORDER WITH
REGARD TO DEPARTMENTAL
PROMOTION COMMITTEE HELD BY
RESPONDENT NO.2 IN THE YEAR 2020.
PESHAWAR AND DEPARTMENTAL
PROMOTION COMMITTEE HELD BY
RESPONDENT NO.4 MARDAN IN THE
YEAR 2014 WHEREBY IN BOTH OF THE
DPC THE APPELLANT HAS BEEN
IGNORED AND OTHER COLLEAGUE
WHO GOT COMPLETED THEIR INTER
COURSE IN THE YEAR 2013 HAS BEEN
PROMOTED TO THE POST OF ASI.

ATTESTED


CLERK
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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Service Appeal No.382/2023 titled "Ghalib Shah Vs. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar and others"

ORDER

Dec. 2023 Kalim Arshad Khan, Chairman: Learned counsel for the appellant present.

2. Learned counsel for the appellant when confronted with the situation that there is no original or appellate order on the file nor is there any proper representation made against any order either original or appellate, to which, learned counsel says that although the appellant had made efforts to get the order from which he was aggrieved but that was not provided. He, however, added that he would advise his client to either apply for the original order or make proper representation for redressal of his grievances and then approach the Tribunal in accordance with the provisions of Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. As regards this appeal, he does not press it and wants to file afresh after doing the needful. Disposed of accordingly. Consign.

3. *Pronounced in open Court at Peshawar and given under our hands and seal of the Tribunal on this 12th day of December, 2023.*

[Signature]
The true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

[Signature]
(Kalim Arshad Khan)
Chairman

Ghalib Shah*

Date of Presentation of Application 22/4/23

Number of Words 2P

Copying Fee 50/-

Urgent Yes

Total 15/-

Name of Applicant [Signature]

Date of Case 22/4/23

Date of Delivery of Copy 22/4/23



30

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

Telephone No. 091-9210641 Fax No. 091-9212597

No. *1116* /EC-I, dated Peshawar the *15/11/2021*

To :- The Regional Police of Police,
Mardan Region.

Subject: APPLICATION.
Memo:

Please refer to this office memo: No. 20502/EC-I, date 03-12-2020 and favour this office with the present position of the case.

Alister
[Signature]

[Signature]
FOR CAPITAL CITY POLICE OFFICER,
PESHAWAR.
14/11/2021

31

OFFICE OF THE
DISTRICT POLICE OFFICER,

~~NOWSHERA~~

Tel No. 0923-9220102 R Fax No. 0923-9220103
Email Dpo_nowsheerapk@yahoo.com

NOV 20 2014

The Deputy Inspector General of Police,
Mardan Region-I Mardan.

No. 1649 /EC, Dated Nowshera the 01-02/2021.

Subject: **APPLICATION**

Memorandum

Kindly refer to your office Endst: No.7938/ES, dated ~~02-02-2014~~ on the subject cited above.

It is submitted that applicant HC Ghali Shah No. No 226 NR /650 was selected for Intermediate College Course during the term ending 20-09-2013 from CCP, Peshawar vide letter No.5591-95/EC-I, dated 02-02-2013.

However, on completion of his Intermediate College course, District Nowshera and Charsadda were detached from CCP, Peshawar and those officials who belonged to CCP, Peshawar were brought on promotion list "D" by CCP office Peshawar, while those who belonged to Nowshera and Charsadda for them, your good office was addressed by the office of CCP, Peshawar vide letter No.3086-97/EC-I, dated 18-02-2014 to bring their names on list "D" including the applicant.

In the light of the said letter, name of the applicant was brought on promotion list "D" by your good office vide Notification No.2051/ES, dated 08-04-2014.

Furthermore, promotion of list "D" seniority is domain of Regional Establishment Office, therefore Regional Office would be in a better position to resolve the matter, please.

Attested
[Signature]

[Signature]
District Police Office,
Nowshera

BETTER COPY NO. (31)

**OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA**

Tel No: 0923-9220107 & Fax No. 0923-9220103
Email Dpo; nowsherakpk@yahoo.com

To, The Deputy Inspector General of Police,
Mardan Region –I Mardan

No: 1649/Dc Dated: Nowshera the 01/02/2021

Subject: APPLICATION

Kindly refer to your office Enst: No. 7938/ES, dated 22/01/2021 on the subject cited above.

It is submitted that applicant HC Ghalib Shah No. 220 NR/650 was selected for Intermediate College Course during the term rendering 20.09.2013 from CCP, Peshawar vide letter No. 5591-95/EC-I, dated 02.08.2013.

However, on completion of his Intermediate College Course, District Nowshera and Charsadda were detached from CCP, Peshawar and those officials who belonged to CCP, Peshawar were brought on promotion list "D" by CCP office Peshawar, while those who belonged to Nowshera and Charsadda for them, your good office was addressed by the office of CCP, Peshawar vide letter No. 3086-97/EC-I, dated 18.02.2014 to bring their names on list 'D' including the applicant.

In the light of the said letter, name of the applicant was brought on promotion list "D" by your good office vide Notification No. 251/ES dated: 08.04.2014.

Furthermore, promotion of list "D" seniority is domain of Regional Establishment Office, therefore Regional Office would be in a better position to resolve the matter, please

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**District Police Office,
Nowshera**

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If insured

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For Insured, Notices, make stamps attached except in uninsured letters of inquiry. All letters to be presented in Post Office Guide or on letter known to be in order.

RC 105963070

NAME OF RECEIVING OFFICE	POST OFFICE	POST OFFICE	POST OFFICE
INSURANCE NO.	INSURANCE NO.	INSURANCE NO.	INSURANCE NO.
NAME AND ADDRESS OF SENDER	NAME AND ADDRESS OF SENDER	NAME AND ADDRESS OF SENDER	NAME AND ADDRESS OF SENDER
WEIGHT (in ounces)	WEIGHT (in ounces)	WEIGHT (in ounces)	WEIGHT (in ounces)
CLASS OF MAIL	CLASS OF MAIL	CLASS OF MAIL	CLASS OF MAIL

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BEFORE RIGHT TO INFORMATION
COMMISSIONER, KHYBER PAKHTUNKHWA

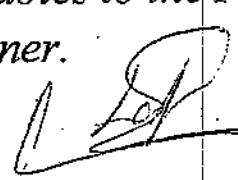
APPLICATION FOR THE DELIVERY
OF THE MINUTES
RECOMMENDATIONS AND
PROMOTION ORDER OF DPC HELD
IN JUNE 2020 BY CAPITAL CITY
POLICE OFFICER, KHYBER
PAKHTUNKHWA WITH REGARD TO
THE PROMOTION OF HEAD
CONSTABLE TO THE POST OF A.S.I.

P-RTI COMMISSION	
Case No:	7283
Date:	14/02/2023
Action:	




Respectfully Sheweth:

1. That petitioner Head Constable No. 220/650 performing his duty since 1991 in Police Department, and in 2013 completed his intermediate college course along with other colleagues and his name was brought on list "D" & for further promotion as per Notification No. 1743/ ES dated 31/03/2014.
2. That in June 2020, a DPC was held in Peshawar by CCPO, whereby all other colleagues of the petitioner were promoted to the post of ASI, but petitioner was ignored.

It is, therefore, prayed that the minutes recommendation and order of that DPC held in June 2020 with regard to the promotion of Head Constables to the Post of ASI may kindly be delivered to the petitioner.


 Ghalib Shah
 Head Constable
 No. 220/650
 Police Department
 17201-9314578-7
 0311-7794004

14/2/23

38664	پشاور بار ایسوسی ایشن، خیبر پختونخوا
ایڈریس: <u>پشاور بار ایسوسی ایشن</u>	  
بار کونسل ایسوسی ایشن نمبر: <u>BC-11-1697</u>	
رابطہ نمبر: <u>0333-9170836</u>	

بعدالت جناب: محترم سر ایس ایچ ایف پشاور بار ایسوسی ایشن

منجانب:	دعویٰ:
<u>علاء محمد ملک صاحبان کا</u>	
<u>بنام تحصیل</u>	علت نمبر:
<u>قورمہ فیض پختونخوا</u>	مورخہ:
	جرم:
	تھانہ:

بابت تحریر آگے

مقدمہ گندرجہ عنوان بالا میں اپنی طرف سے واپس پیروی و جواب دہی کارروائی متعلقہ آن مقام پشاور بار ایسوسی ایشن کے اقرار کیا جاتا ہے کہ صاحب محض کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائز التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 23/4/2024

المرقوم: 23/4/2024

المرقوم: 23/4/2024