

**BEFORE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR**

CM NO. _____ /2024
IN
APP NO. 7026/ OF 2021

USMANI GUL

(APPELLANT)

VERSUS

REGIONAL POLICE MALAKAND & OTHERS

(RESPONDENTS)

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APPELLANT

THROUGH


FAZAL HADI ADVOCATE

DATED: 03-09-2024

①

**BEFORE THE KHYBER PAKHTUN KHWA
SERVICE TRIBUNAL, PESHAWAR**

CM NO. _____ /2024
IN
APP NO. 7026/ OF 2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15366

Dated 03.09.24

USMANI GUL

(APPELLANT)

VERSUS

REGIONAL POLICE MALAKAND & OTHERS

(RESPONDENTS)

**REPLY TO THE OBJECTION PETITION AGAINST THE ORDER
DATED 04-05-2023 IN SERVICE APPEAL NO 7026/2021**

PRELIMINARY OBJECTION

1. That the present objection petition on order dated 04-05-2023 is not maintainable.
2. That the appellant/objector has not come to the court with clean hand.
3. That the appellant waste the precious time of this honorable Court.

PARA WISE REPLY;

1. Para No.1 is correct and needs no reply.
2. The objection taken by the Judgment Debtor/Respondent is ill founded and without substance. The judgment of Khyber pakhtoon khwa service Tribunal allowing the Decree Holder/Applicant's claim of promotion is in field and has not been suspended or stayed by any higher forum/competent authority. It is therefore in the best interest of justice to grant the Decree Holder/Applicant his claim of promotion as there is nothing barring the same.
3. Para No 3 is incorrect that the appellant was selected for upper college course 1st term 2020 through letter no 7823-36/ E dated 07-09-2020 at serial no 02,

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and the said Course was passed by the appellant on dated 06-02-2021, that the appellant also passed the various departmental courses.

Copies of relevant Documents are attached is Annexure A

- 4. Para No. 04 needs no reply.
- 5. Para No. 05 is incorrect that the appellant was fulfilled the required criteria for the rank of SI, as mentioned above in Para No. 03.
- 6. Para No. 06 is incorrect, as the appellant was fulfilled the required criteria for the rank of SI.
- 7. Para No.07 needs no reply.

FOREGOING IN VIEW, IT IS HUMBLY PRAYED THAT THE OBJECTION PETITION MAY KINDLY BE DISMISSED IN THE BEST INTEREST OF JUSTICE.

APPELLANT/RESPONDENT

THROUGH

FAZAL HADI ADVOCATE

DATED: 03-09-2024

VERIFICATION

VERIFIED ON SOLEMN OATH, THAT THE CONTENTS OF THIS OBJECTION PETITION, WHICH ARE TO BE READ AS PART OF THE TITLED SUIT, ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED FROM THIS HONORABLE COURT.

COUNSEL





3

OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND REGION
SAIDU SHARIF SWAT.

Ph: 0946-9240388 & Fax No. 0946-9240390

Email: ehmalakandregion@gmail.com

Annexure
"A"

No. 7823-36 /E, dated Saidu Sharif the 07 / 09 /2020

To :

- The Addl: Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa, Peshawar.
- The Commandant Elite Force,
Khyber Pakhtunkhwa, Peshawar.
- The Deputy Inspector General of Police,
CTD, Khyber Pakhtunkhwa, Peshawar.
- The Director, Anti-Corruption Establishment,
Khyber Pakhtunkhwa, Peshawar.
- All District Police Officers & All Heads of Investigation,
In Malakand Region.
- The Superintendent of Police, Traffic Warden, Swat.
- The Superintendent of Police,
Elite Force, Malakand Region at Swat.

Subject: SELECTION FOR UPPER COLLEGE COURSE 1st TERM 2020.

Memorandum:

The following Sub Inspector on list-"E" of this Region are hereby selected for Upper College Course 1st term 2020:-

S#	Name & No.	Place of Posting
1.	SI Muhammad Hassan	No. 613/M CTD
2.	SI Usman Gul	No. 667/M Shangla ✓ Police ki
3.	SI Alam Zeb	No. 771/M Inv: Buner
4.	SI Amir Alam	No. 47/M Dir Lower
5.	SI Ijaz Ali	No. 54/M CTD
6.	SI Liaqat Ali	No. 55/M Swat
7.	SI Usman Ali	No. 56/M Swat
8.	SI Haider Hussain	No. 58/M SB
9.	SI Liaqat Ali	No. 59/M Buner
10.	SI Amanullah Khan	No. 60/M Elite Force / Swat
11.	SI Bakhtullah	No. 63/M Swat
12.	SI Mukamill Khan	No. 69/M Elite Force
13.	SI Amlin Khan	No. 77/M Dir Upper
14.	SI Muhammad Dawood	No. 79/M CTD
15.	SI Lal Bahadar	No. 81/M Dir Upper
16.	SI Adalat Khan	No. 82/M Dir Upper
17.	SI Bakht Sardar	No. 83/M CTD

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18.	SI	Sultan Rahman	No.	84/M	Inv: Dir Upper
19.	SI	Muhammad Afzal Khan	No.	91/M	CTD
20.	SI	Amroz Khan	No.	93/M	Traffic Warden, Swat
21.	SI	Sohrab	No.	95/M	Inv: Swat
22.	SI	Ismail	No.	97/M	Dir Upper
23.	SI	Sabz Ali	No.	104/M	ACE
24.	SI	Sher Hayat	No.	895/M	Inv: Dir Lower
25.	SI	Bakht Wahid	No.	105/M	Swat
26.	SI	Said Mukhtiar	No.	115/M	CTD
27.	SI	Ibrahim Shah	No.	121/M	Chitral
28.	SI	Umar Wahab	No.	122/M	Inv: Swat
29.	SI	Liaqat Ali	No.	124/M	Shangla
30.	SI	Muhammad Usman	No.	129/M	Swat

Astobek

The selectees may be directed to report at PTC Hangu on 15/09/2020 before 16:00 hrs: as directed by Commandant PTC, Hangu vide his office signal No.1374-1443/GC, dated 25/08/2020 please.

Endst: No. & dated even

- Copy for information to the:-
1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar please.
 2. Commandant, PTC Hangu.



Regional Police Officer,
Malakand, at Saidu Sharif Swat

[Handwritten signature]
17/9/2020

OB/EG
for necessary action

[Handwritten signature]
District Police Officer,
SHANGLA
819/2020

ATTESTED



No 2215-201E

Date 22-2-21

Regional Police Officer, 2
Malakand Region, 18/2/21

Office the Commandant, Police Training College, Hangu.

Ph # 0925-621886

Fax # 0925-620886

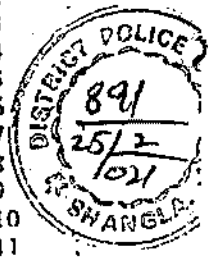
**FOR PUBLICATION IN KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDERS BY THE COMMANDANT POLICE TRAINING COLLEGE HANGU.**

**NOTIFICATION
Dated 16/02/2021.**

No. 104 IS/RESULT: The result of the following Officers, of your Dist./Units, who appeared in the final examinations of Upper College Course, held at PTC Hangu for the term ending 15.01.2021 is hereby announced and given below. Their Order of Merit is noted against each. The Original Performance Reports of the Passed Candidates shall be issued and sent separately.

Result of Upper Course Term Ending 15.01.2021.

S#.	Comp#.	Name	Roll#.	District.	Merit No
1	U-2771	Ali Ul Rehman	205	Kohat	1
2	U-2765	Muhammad Asghar		Bagh AJK	2
3	U-2751	Zareen Taj	180	Kohistan	3
4	U-2775	Ishfaq Ali		Mirpur AJK	4
5	U-2764	Sajjad Ahmad		Punch AJK	5
6	U-2817	Dainaz Khan	121	Bannu	6
7	U-2773	Zahab Tahir		Meer Pur AJK	7
8	U-2774	Umar Wahab	122	Swat	8
9	U-2754	Bakht Wahid	106	Swat	9
10	U-2869	Liaqat Ali	378	Islamabad	10
11	U-2809	Amir Hamza	206	Kohat	11
12	U-2795	Muhammad Javed	26	Mansehra	12
13	U-2811	Mikhar Ali	426	Mardan	13
14	U-2860	Barkat Ali Khan	85	Haveli AJK	14
15	U-2804	Nadeem Hassan	433	Mardan	15
16	U-2750	Hidayat Shah	422	Nowshera	16
17	U-2825	Ghulam Ahmad	346	Islamabad	17
18	U-2810	Mikhar Ahmad	60	CCP Pesh:	18
19	U-2801	Amir Ullah	355	Swat	19
20	U-2828	Noor Ul Basur	115	CCP Pesh:	20
21	U-2782	Syed Mukhtar	341	Buner	21
22	U-2837	Bakht Zaman	336	CCP Pesh:	22
23	U-2817	Khan Zeh	47	CCP Pesh:	23
24	U-2826	Amir Alam Khan	347	Dir Lower	24
25	U-2839	Fazal Mola		CCP Pesh:	25
26	U-2762	Muhammad Razaqar	97	Muzaffar Abad AJK	26
27	U-2770	Ismail	107	Dir Upper	27
28	U-2823	Asmat Ullah	82	Lakki Marwat	28
29	U-2854	Adilul Khan	667	Dir Upper	29
30	U-2830	Usmani Gul	108	Shangla	30
31	U-2857	Mushtaq Ahmad	21	Abhattabad	31
32	U-2793	Mehrban Shah	357	Mardan	32
33	U-2862	Umar Hidayat	195	CCP Pesh:	33
34	U-2858	Muhammad Vasceem	139	Abhattabad	34
35	U-2755	Kazim Hussain Shah	208	D.I.Khan	35
36	U-2747	Muhammad Arshad Khan	421	Abhattabad	36
37	U-2748	Shafiq Ahmad	431	Swabi	37
38	U-2820	Uzfar Wahid	121	Mardan	38
39	U-2845	Ibrahim Shah	77	Chitral	39
40	U-2847	Alamzeb		Buner	39



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2018
for

Police Officer
SHANGLA

OB. No. 21/2/2021

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Comp#.	Name	Roll#.	District.	Merit No
U-2851	Muhammad Amjad	19	Abbotabad	40
U-2742	Abdul Wahid	210	Nowshera	41
U-2796	Liaqat Ali Khan	59	Buner	42
U-2855	Yousaf Khan	65	Kohat	43
U-2760	Ibram Badshah	352	CCP Pesh:	44
U-2866	Lal Bahadur	81	Dir Upper	45
U-2840	Naseer Ahmad	356	CCP Pesh:	45
U-2756	Kohat Gul	199	Kohat	46
U-2786	Hassan Khan	62	Kohat	47
U-2859	Zainoor Shah	337	CCP Pesh:	48
U-2802	Muhammad Zubair	207	Manshra	49
U-2753	Mukamal Khan	69	Buner	49
U-2757	Shah Hussain	422	Mardan	50
U-2864	Masroor Haider Shah	194	Kohistan	51
U-2850	Shah Hussain	199	Abbotabad	52
U-2776	Muhammad Uzair	129	Swat	53
U-2867	Ajaz Ali	54	CTD Dir Upper	54
U-2868	Arshad Mehmood	409	Islamabad	55
U-2821	Latif Khan	407	Mardan	56
U-2763	Aman Ullah	164	Mardan	57
U-2838	Saleh Shah	345	CCP Pesh:	58
U-2767	Ahmad Hussain	134	D.I.Khan	59
U-2788	Muhtaj Ali	427	Swabi	60
U-2790	Asif Shah	213	Manshra	61
U-2819	Farman Ali	432	Mardan	62
U-2744	Subz Ali Khan	104	Dir Lower	62
U-2834	Bakht Sarder	83	CTD Swat	63
U-2849	Noor Ul Amin	175	Mardan	63
U-2824	Muhammad Rustom Khan	90	Bannu	64
U-2784	Rafiq Khan	772	CCP Pesh:	65
U-2781	Muhabbat Shah	117	Batagram	65
U-2808	Naeem Farooq	428	Islamabad	66
U-2766	Taus Khan	149	D.I.Khan	67
U-2848	Muhammad Kareem	429	Charsadda	68
U-2865	Amin Khan	77	Dir Upper	69
U-2798	Haroon Ur Rashid	395	Mardan	70
U-2783	Malang Jan	331	CCP Pesh:	71
U-2749	Hanif Ali	430	Nowshera	72
U-2789	Shantim Khan	248	Hangu	73
U-2803	Safar Ali	56	CTD Kohat	74
U-2853	Haider Hussain	58	Chitral	74
U-2758	Javed Iqbal	425	Mardan	75
U-2769	Sultan Ur Rehman	84	Dir Upper	76
U-2797	Liaqat Ali	124	Shangla	77
U-2814	Waheed Noor Khan	93	Lakki Marwat	78
U-2785	Sartaj Khan	428	Mardan	79
U-2806	Imtiaz Ali Shah	344	CCP Pesh:	80
U-2800	Faqir Jan	348	CCP Pesh:	81
U-2777	Liaqat Ali	55	Swat	82
U-2759	Ishaq Hussain	45	Kohat	82
U-2863	Shakil Ahmad	135	Tank	83
U-2794	Saba Ali	354	CCP Pesh:	84
U-2761	Muhammad Saddiq		Jehlum Valley	85
U-2812	Anrooz Khan	95	Swat	86
U-2829	Mintaj Khan	339	CCP Pesh:	87
U-2836	Tariq Mehmood	104	Islamabad	88
U-2743	Gulzar Khan	205	CCP Pesh:	89
U-2827	Sher Hayat Khan	895	Dir Lower	90
U-2792	Kamran Ali Shah	68	Bannu	91
U-2846	Zahir Ahmad	159	Mardan	92

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Compl.	Name	Roll No.	District	Merit No
U-2835	Muhammad Dawood	79	CTD Swat	92
U-2832	Sahrab Khan	95	Swat	92
U-2752	Naeem Jan	350	CCP Pesh:	93
U-2818	Zurshad Khan	362	CCP Pesh:	94
U-2861	Mehboob Khan	45	Mardan	95
U-2816	Muhammad Hussain	613	Swat	96
U-2778	Bakhti Ullah	63	Swat	97
U-2841	Khaild Khan	358	CCP Pesh:	98
U-2842	Israr Muhammad	213	CCP Pesh:	99
U-2870	Moin Shah	89	Kohistan	100
U-2832	Shah Zareen Khan	361	CCP Pesh:	101
U-2772	Niaz Khan	216	Haripur	102
U-2746	Haji Said Ahmad	137	Tank	103
U-2831	Fazal Khaliq Khan	332	CCP Pesh:	104
U-2833	Muhammad Afzal Khan	91	CTD Swat	105
U-2807	Payaz Ali	21	CCP Pesh:	106
Result of Re-appeared candidates of Upper Course Term Ending 31.08.2020.				
U-2690	Aalam Khan	16	D.I.Khan	107
U-2709	Shams Ur Rehman	259	Karak	108
U-2737	Kifayat Ullah	174/147	Tank	109
U-2620	Khan Muhammad	783	Dir Lower	110
Awarded grace marks, declared passed candidates in Upper Course Term Ending 15.01.2021.				
U-2852	Ahjuul Salar	71	Abbottabad	111
U-2805	Naveed Saddiq		Mirpur AJK	112
U-2779	Aman Ullah	340	CCP Pesh:	113
U-2780	Ajmal Khan	193	Haripur	114
U-2745	Naeem Akhtar	203	Abbottabad	115
U-2843	Hayat Shah	364	CCP Pesh:	116
U-2787	Raj Wali Khan	93	CCP Pesh:	117
U-2768	Shafi Jan	152	D.I.Khan	118
U-2844	Muhammad Raheem	359	CCP Pesh:	119
U-2799	Shoukat Ali	353	CCP Pesh:	120
U-2871	Mutawar Shah	87	Kohistan	121
U-2815	Sher Mal Khan	54	Bannu	122
U-2791	Sher Afghan	201	Haripur	123
U-2856	Muhammad Javed	323	CCP Pesh:	124

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Awarded price marks, declared passed re-appeared candidates in Upper Course Term Ending
15.01.2021.

135 U-2677 Jehanzeb 370 Mardan 125

Abdul Ghaffoor Afridi, (PSC)
 Commandant,
 Police Training Collage, Hangu

No. 105-49 IS dated Hangu, the 16 - 02.2021.

Copy for information and necessary action to:

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Inspector General of Police, Islamabad.
3. The Addl. IGP HQs, Khyber Pakhtunkhwa Peshawar.
4. The DIsG Training and CTD, Khyber Pakhtunkhwa Peshawar.
5. The DIsG/RPOs Police Bannu, Hazara, Malakand, Mirpur AJK, Muzaffar Abad, D.I. Khan, Kohat, Mardan and Punch Regions.
6. The Capital City Police Officer, Peshawar.
7. The DPOs, Abbottabad, Bannu, Battagram, Buner, Charsadda, Chitral, D.I. Khan, Dir Lower, Dir Upper, Hangu, Haripur, Karak, Kohat, Kohistan, Lakki Marwat, Mansehra, Mardan, Nowshera, Shanglu, Swabi, Swat and Tank.
8. The S.SP, Bagh, Haveli, Jehlum Valley, Mir Pur, Muzaffar Abad & Punch.
9. The Office Superintendent PTC Hangu.

Prepared by Comp: Operator

Checked and found correct.

Muhammad
 Controller of Examinations,

Abdul Ghaffoor Afridi, PSC
 Commandant,
 Police Training Collage, Hangu

Amar

ATTESTED

Police Training College Hangu 9



PERFORMANCE REPORT

Starting Date : 16.09.2020 Ending Date : 15.01.2021
 College Course : Upper Name : Usmani Gul
 District/Unit : Shangla Comp# : U-2830
 Belt No. : 667 Company : Yaqoob
 Education : BA Merit : 30

Subjects	Marks obtained	Marks allotted	Subjects	Marks obtained	Marks allotted	Remarks	
PPC	56	/100	Parade	33.33	/50.00	Declared Passed	
CrPC	61	/100	PT	22.33	/30.00		
PR	57	/100	FTTS	32.33	/50.00		
SA	63	/100	Raid	20	/30.00		
LSL	61	/100	Ambush	22.33	/50.00		
MJ	78	/100	9mm Pistol Fire	48	/50.00		
Ist	79	/100	A.F SMG	100	/100.00		
PPWT	36	/50	N.Bandi	19.33	/30.00		
AC	26	/50	Total	297.65	/370		
PPWP	86	/100					
QS	62	/100					
PD	33	/50					
Total	698	/1050					Overall %age is: 70.12

Grand Total 995.65 / 1420.00
 Leave: 6 days, Evidence: Nil, M. Rest: 3 days, Absence: Nil, Punishment: Nil, Rewards: Nil

Comments: *Good*
 Checked and found correct.

Incharge Secrecy

Amad
 Controller of examinations
 For Commandant,
 Police Training College Hangu.

ATTESTED

Police Training College, Hangu

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Reg No	45139-2020
Name	USMAN GUL
Father Name	NOOR KHALID
Blood Group	A+ DOB 5/05/68
Rank & No	667
District	SHANGLA
Course	UPPER
Company	YAQOOB
Date Of Issue	15-September-2020
Date Of Expiry	15-January-2021



ISSUE

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INTERNATIONAL COMMITTEE OF THE RED CROSS

THIS IS TO CERTIFY THAT Assistant Sub Inspector Usmani Gul

HAS ATTENDED Seminar on Public Order Management

HELD At Police School of Public Disorder & Riot Management, Mardan Khyber Pakhtunkhwa

DATE 29 August to 02 September 2016

ATTESTED

①

Mirjam Lea MDI
Head of Sub Delegation
Peshawar
ICRC

Mardan, 02 September 2016

Cristof Peddor
Regional Police and Security Forces
Delegate
ICRC

Mushtaq Ahmad
Superintendent Police
Director
Police School of Public Disorder and Riot
Management, Mardan



ICRC

CERTIFICATE

S. No. 3581/Exp



This is to certify that

SI USMANI GUL No. 667/11 District SHANGLA

has Participated and Successfully Completed BASIC F.O.D. COURSE No. 56

Training on 07. 06. 2021 To 18. 06. 2021

held at Police School of Explosive Handling, Nowshera.

Dated 18. 06. 2021

Quaish Khan

Deputy Inspector General of Police,
Training
Khyber Pakhtunkhwa, Peshawa

[Signature]

Director
Police School of Explosive Handling
Nowshera

ATTESTED

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CERTIFICATE



This is to certify that

Mr. Usmani Gul 667/M Rank SI District Shangla

has participated and successfully completed One Week "Mid Level Management Course" No. 46 held

at Police School of Public Disorder & Riot Management Mardan from 25.01.2021

to 29.01.2021

Deputy Inspector General of Police,
Training
Khyber Pakhtunkhwa, Peshawar.

Director
Police School of Public Disorder
& Riot Management Mardan.

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CERTIFICATE

S.No. 1088/2017



EUROPEAN UNION





This is to certify that
SI Usmani Gul District Shangla

has Participated and Successfully Completed training on
Criminal Investigation and Crime Scene Management
Held at Police School of Investigation Hayatabad, Peshawar.

Dated. 23 Oct - 03 Nov, 2017


Deputy Inspector General of Police
Training
Khyber Pakhtunkhwa, Peshawar.


Paul Norman
International Policing Specialist
SRLP. UNDP


Director
Police School of Investigation
Hayatabad Peshawar

ATTESTED

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CERTIFICATE

S.No. 422



This is to certify that

ASI Usmani Gul District Shangla

has Participated and Successfully Completed One Week Training on
Case File Management Course

held at Police school of Investigation Hayatabad, Peshawar.

Dated. 13-08-2015

Deputy Inspector General of Police,
Training
Khyber Pakhtunkhwa, Peshawar

Director
Police School of Investigation
Hayatabad Peshawar

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S.No. 249/2018

POLICE SCHOOL OF INVESTIGATION HAYATABAD, PESHAWAR.



This is to certify that

SI Usmani Gul M/667

District

Shangla

has Participated and Successfully Completed

One Week

Training on

Cellular Forensics

held at Police School of Investigation Hayatabad, Peshawar. Dated

05 to 09 March, 2018

Imr Anis

Deputy Inspector General of Police
Training
Khyber Pakhtunkhwa, Peshawar.



M. J. I.

Director
Police School of Investigation
Hayatabad Peshawar

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