FORM OF ORDER SHEET

Court of			
		_	

	· \	Appeal No. 1039/2024
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
.1,	2	3,
		
1-	25 / 07/ 202 4	The appeal of Mr. Bakhtiar Khan resubmittee
		today by Mr. Saadullah Khan Marwat Advocate. It is fixed fo
	•	preliminary hearing before Single Bench at Peshawar or
-		29.07.2024. Parcha Peshi given to counsel for the appellant.
	•	= 3 To 7 To 5 Tr 1 de onta 1 est 1 g. von to evanset 107 ene appendina
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		By the order of Chairman
		708/21
	*	RECISTRAIL
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This is an appeal filed by Mr. Bakhtiar Khan today on 19,07.2024 against the order dated 14.07.2023 against which he preferred/made a departmental appeal on 24 .04.2024 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhturkhwa 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 file fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Check list not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Affidavit is not attested by the Oath Commissioner.
- 4- Annexures of the appeal are unattested.
- 5- Annexures-B&C of the appeal are illegible be replaced by legible/better one.
- 6- Four more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 413 /Inst./2024/KPST,

Dr. 22/7 /2024.

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Saadullah Khan Marwat Adv. High Court Peshawar.

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Re-no-: thed after removing the cely'colony.

25/7/24.

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

C. M. No._____ / 2024

IN

S.A. No.

/2024

Bakhtiar Khan

versus :

RPO & Another

APPLICATION FOR HEARING OF THE SUBJECT APPEAL AT PRINCIPAL SEAT:

Respectfully Sheweth,

- 1. That applicant filed the subject Appeal before this hon'ble Tribunal today.
- 2. That R. No. 02 hails at Peshawar, furthermore the subject appeal along with connected 06 others, appellants are serving at different stations, so it will be convenient for appellant to heard the subject case along with connected appeals on the Principal seat at Peshawar.

It is, therefore, most humbly prayed that the application be accepted as prayed for.

Appellant

Through

Saadullah Khan Marwat

Advocate

Dated 23-07-2024

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CHECKLIST

Časi	e Title: Bakhtiar khen v/s Dice	Dela	<u>لي ل</u>
S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _ ^ C / 600 williams	1	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	~	
3	Whether appeal is within time?	1	
4	Whether the enactment under which the appeal is filed mentioned?	V	-
Ś	Whether the enactment under which the appeal is filed is correct?	-	
6	Whether affidavit is appended?	√	
7	Whether affidavit is duly attested by competent Oath Commissioner?	1	
8	Whether appeal/annexures are properly paged?	1	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	×	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	1	1.1.
12	Whether copies of annexures are readable/clear?	1	
13	Whether copy of appeal is delivered to AG/DAG?	1	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	1	
16	Whether appeal contains cutting/overwriting?	×	
17	Whether list of books has been provided at the end of the appeal?	V	
18	Whether case relate to this court?	1	
19	Whether requisite number of spare copies attached?	1	-
20	Whether complete spare copy is filed in separate file cover?	V	
21	Whether addresses of parties given are complete?	√	
22	Whether index filed?	1	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On	1	
25 25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	✓	
26	Whether copies of comments/reply/rejoinder submitted? On	~	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: S	re selentas	Colon Maruel
Signature:	1	- elely 10 -
Dated:	25/7	124

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A. No. 1039 /2024

Bakhtiar Khan

versus

RPO & Another

INDEX

S. No.	Documents	Annex	P. No.
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3.	Recommendation dated 01-02-2017	"B"	10-12
4.	Appointment order dated 23-02-2017	"C"	13
5.	Confirmation order dated 13-02-2020	"D"	14
6.	Letter for promotion dated 11-07-2023	"E"	15-16
7.	Promotion order of colleagues, 14-7-23	"F"	17
8.	Representation dated 24-04-2024	"G"	18-19

Through

Appellant

Saadullah Khan Marwat

Advocate

21-A, Nasir Mansion,

Shoba Bazaar, Peshawar

Ph: 0300-5872676

Dated 18-07-2024

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. <u>1939</u> /2023

Bakhtiar Khan S/O Abdul Khanan Assistant Sub-Inspector No. 103/B Diary No. 14367

(ASHO) Police Station Lakki City Appellant

Versus

1. Regional Police Officer,

Bannu Region Bannu.

2. **Provincial Police Officer,**

> KP, Peshawar. Respondents

> > ⇔<=>⇔<=>⇔<=>⇔

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST ORDER NO. 2283-88 / EC DATED 14-07-2023 OF R. NO. 01 WHEREBY COLLEAGUES / BATCH-MATES OF APPELLANT WERE PROMOTED TO THE RANK OF OFFICIATING SUB-INSPECTORS AND APPELLANT WAS IGNORED FOR NO LEGAL REASON.

⇔<=>⇔<=>⇔<=>⇔

Respectfully Sheweth;

- That on 18-07-2014, the department placed 263 posts before the 1. Commission for appointment of Probationer Assistant. Sub-Inspectors after advertisement the same. (Copy as annex "A")
- That after going through the prescribed procedure of selection, the Commission recommended numerous incumbents, the name of appellant was figured at S. No. 45 vide order dated 01-02-2017.

Copy as annex "B")

ybanist

- 3. That in pursuance of the aforesaid recommendation of the Commission, R. No. 01 issued appointment order on 23-02-2017 by figuring name of appellant at S. No. 09 along with colleagues. (Copy as annex "C")
- 4. That on satisfactory performances of the official duties, appellant was confirmed on 13-02-2020 after completion of 03 years' probation period and his name was then brought on promotion list "E", and then figured his name at S. No. 03. (Copy as annex "D")
- 5. That on 11-07-2023, R. No. 01 wrote letter to DPO Bannu / Lakki Marwat to remit the names of eligible ASI's for promotion to the rank of Officiating Sub-Inspector. The name of appellant was figured at S. No. 26 along with his colleagues. (Copy as annex "E")
- 6. That on 14-07-2023, R. No. 01 promoted colleagues to the rank of Officiating Sub Inspectors but the name of appellant was not figured in the list, however, his colleagues names were figured from S. No. 10 to 15, thus made discrimination. (Copy as annex "F")
- 7. That on 24-04-2024, appellant submitted representation before R. No. 02 for promotion to the rank of Officiating Sub-Inspector with his colleagues but in vain. (Copy as annex "G")

Hence this appeal, Inter Alia, on the following grounds:-

GROUNDS

- 1. That strange enough, colleagues of appellant were promoted to the rank of Officiating Sub Inspectors B-14 but the name of appellant was dropped from the same.
- 2. That process of further promotion to the rank of Officiating Sub-Inspector was initiated by the department but appellant was deferred for no legal reason but due to malice.
- 3. That similarly and equally placed persons be treated alike under the law as well as per the judgments of the apex court but no such treatment was extended to appellant.

- 4. That no reason of dropping, of the name of appellant was given in the promotion order, thus discriminated.
- That promotion order dated 14-07-2023 ignoring appellant from promotion to the rank of Officiating Sub-Inspectors is not per the mandate of law, rather based on malafide.

It is, therefore, most humbly prayed that on acceptance of the appeal, order dated 14-07-2023 by promoting colleagues to the rank of Officiating Sub-Inspectors and by ignoring appellant be reviewed / modified and he be promoted to the said rank with all service benefits from the aforesaid date, with such other relief as may be deemed proper.

Appellant

Like Kims

Through

Saadullah Khan Marwat

Arbab Saiful Kamal

Amjad Nawaz

Advocates

CERTIFICATE:

Dated: 18-07-2024

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

Advocate

AFFIDAVIT

I, Bakhtiar Khan No. 103/B, Assistant Sub Inspector (ASHO), Police Station Lakki City (appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief

DEPONENT



KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION 2- Fort Road Peshawar Cantt:

Website: www.kppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: <u>18/07/2014</u>

ADVERTISEMENT No. 04 / 2014.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa by 22/08/2014(candidates applying from abroad by 05/09/2014. Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

1. <u>TWO HUNDRED & SIXTY THREE (263) MALE ASSISTANT SUB-INSPECTORS IN POLICE DEPARTMENT (GENERAL QUOTA).</u>

QUALIFICATIONS: Higher Secondary School Certificate or equivalent qualification from a recognized Board of Pakistan or Abroad.

PAYSCALE: (BPS-09).

AGE LIMIT: 18 to 25 years.

Gender:

Male

PHYSICAL

STANDARD: Height: 5 feet and 7 inches (5' x 7")

Chest: 33" x 341/2"

Allocation: The allocation of the posts shall be district wise in the following order: -

S.#			Name of Districts	No. of Posts	
1.	CCPO Peshawar	33	13.	Shangla	12
2.	Charsada	09	14.	Dir Upper	13
3.	Nowshera	09	15.	Dir Lower	17
4.	Mardan	09	16.	Buner	13
5.	Swabi	05	17.	Chitral	13
6.	Abbottabad	09	18.	Kohat	08
7.	Manshera	- 08	19.	Hangu	06
8.	Haripur	07	20.	Karak	07
9.	Battagram	05	21.	Bannu	09
10.	Torghar	08	22.	Lakki	08
11.	Kohistan	09	23.	D.I.Khan	09
12.	Swat	29	24.	Tank	08

2. TWENTY NINE (29) FEMALE ASSISTANT SUB-INSPECTORS IN POLICE DEPARTMENT (GENERAL QUOTA).

QUALIFICATIONS: Higher Secondary School Certificate or equivalent qualification from a recognized Board of Pakistan or Abroad.

PAY SCALE: (BPS-09).

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Attested to be True

AGE LIMIT: 18 to 25 years.

GENDER: Fe

Female

PHYSICAL

STANDARD: Height: 5 feet and 1 inch (5' x 1")

Allocation: The allocation of the posts shall be district wise in the following order: -

S.#	Name of Districts	No. of Posts	S.#	Name of Districts	No. of Posts
1.	CCPO Peshawar	03	13,	Shangla	01
2.	Charsada	01	14.	Dir Upper	01
3.	Nowshera	01	15.	Dir Lower	02
4.	Mardan	01	16.	Buner	01
5.	Swabi	01	17.	Chitral	01
6.	Abbottabad	01	18.	Kohat	01
7.	Manshera	01	19.	Hangu	01
8.	Haripur	01	20.	Karak	01
9.	Battagram	01	21.	Bannu	01
10.	Torghar	01	22.	Lakki	01
11.	Kohistan	01	23.	D.I.Khan	01
12.	Swat	03	24.	Tank	01

3. NINE (09) MALE/FEMALE ASSISTANT SUB-INSPECTORS IN POLICE DEPARTMENT (MINORITY QUOTA).

OUALIFICATIONS: Higher Secondary School Certificate or equivalent qualification from a

recognized Board of Pakistan or Abroad.

PAY SCALE: (BPS 09).
AGE LIMIT: 18 to 25 years.

Gender: Male/Female

PHYSICAL

STANDARD: For Male:

Height: 5 feet and 7 inches (5' x 7")

Chest: 33" x 341/2"

For Female: Height: 5 feet and 1 inch (5' x 1")

Allocation: The allocation of the posts shall be district wise in the following order: -

S.#	Name of Districts	No. of Posts
1.	CCPO Peshawar	2
2.	Mardan	1
3.	Abbottabad	1
4.	Manshera	1
5.	Swat	1
6.	Kohat	1
7.	Bannu	1
8.	D.I.Khan	1

4. THREE HUNDRED & TWENTY FOUR (324) MALE/FEMALE ASSISTANT SUB-INSPECTORS IN POLICE DEPARTMENT AMONGST IN-SERVICE GRADUATE CONSTABLES/ HEAD CONSTABLES.

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OUALIFICATIONS: Bachelor degree from any recognized university of Pakistan or abroad.

PAY SCALE: (BPS-09).

AGE LIMIT: Upto 35 years.

Gender: Male/Female

Training and Experience:

Basic Police Recruit Course Passed.

2. Minimum five (05) years service in police department.

3. Satisfactory service record.

Allocation: The allocation of the posts shall be district wise in the following order: -

S.#	Name of Districts	No.of Posts	S.#	Name of Districts	No.of Posts
1.	CCPO Peshawar	38	13.	Shangla	12
2.	Charsada	09	14.	Dir Upper	16
3.	Nowshera	08	15.	Dir Lower	26
4.	Mardan	10	16.	Buner	15
5.	Swabi	04	17,	Chitral	17
6.	Abbottabad	15	18.	Kohat	10
7.	Manshera	15	19.	Hangu	10
8.	Haripur	10	20.	Karak	08
9.	Battagram	06	21.	Bannu	08
10!	Torghar	08	22.	Lakki	08
11	Kohistan	11	23.	D.I.Khan	16
12.	Swat	39	24.	Tank	05

MODE OF EXAMINATION

Physical Endurance Test:-

All the eligible candidates applying for initial recruitment for the post of Assistant Sub-Inspector, shall qualify the following physical endurance tests to be conducted by a team of three members, two from the Public Service Commission and one from Police Department to be nominated by the Provincial Police Officer.

CATEGORIES

RACE

Male Candidates:

1600 meters in 8:00 minutes.

Female candidates:

1000 meters in 8:00 minutes.

All categories of candidates shall qualify physical endurance test. Candidates who fail to qualify the physical endurance test shall not be eligible to appear in other tests.

Written Examination:-

Candidates, both general and in service, who qualify the physical endurance test, shall be eligible to appear in the written examination to be conducted by the Khyber Pakhtunkhwa Public Service Commission.

Attested to be True

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The written examination shall be conducted in the subjects specified in the table below:-

S. No	Subject	Maximum Marks	Paper Duration	Qualifying Marks
1.	Urdu Essay and Comprehension	75	1 hours	40%
2.	English Essay and Comprehension	75	1 hours	40%
3.	General Knowledge and Current affairs	50	1 hours	40%
4.	Basic Proficiency in computer literacy like MS Word, Ms Power Point, MS Excel, Internet surfing and Email	50	1 hours	40%
5.	Viva voce	50	<u>.</u> .	40%
l'otal		300		40%

Psychological Test:-

Candidates, both general and in Service, who qualify written examination, shall be called by the Public Service Commission for psychological test to be conducted by certified psychologist of Khyber Pakhtunkhwa Public Service Commission. The result of this test shall be a guide for the interview panel whether or not candidate is suitable for the police job.

Viva Voce Examination:-

Psychological test shall be followed by viva voce exam to be conducted by the Public Service Commission. The candidate shall appear before the interview panel at the time of viva voce examination. Failure in or absence from viva voce shall mean that the candidate has failed to qualify the examination for the post of Assistant Sub-Inspector.

Candidates who qualify physical endurance test, written examination and viva voce shall undergo medical examination to be conducted by Director Health Services Government of Khyber Pakhtunkhwa.

Final merit list shall be prepared by the Khyber Pakhtunkhwa Public Service Commission. If the total marks of any of the two candidates are equal, the candidate with higher marks in viva voce test shall be placed higher on merit and, in case, where the marks obtained in viva voce are also equal, the candidate older in age shall be placed higher on merit list.

Issuance of appointment order shall be subject to background clearance reports from intelligence agencies.

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<u>GENERAL CONDITIONS</u>

Age shall be reckoned on 01/01/2015. The candidates are required to be academically i) qualified in all respects by 22/08/2014. Candidates not in possession of the required qualification by the last date for receipt of application for inland candidates shall not be considered. Maximum age limit as prescribed in the recruitment rules shall be relaxed upto Ten years for Disable persons and Govt, servants who have completed two years continuous service and upto 03 years for candidates belonging to backward areas specified in the appendix attached to the Khyber Pakhtunkhwa Initial Appointment to Civil Posts (Relaxation of Upper Age Limit) Rules, 2008. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to govt servants, general or disable candidates, whichever is relevant and applicable to them. Employees or Ex-employees of development projects of the govt. of Khyber Pakhtunkhwa and employees or Exemployees of development projects of the federal govt. under the administrative control of the govt of Khyber Pakhtunkhwa shall also be entitled to age relaxation equal to the period served in the projects, subject to a maximum limit of ten years provided that this age relaxation shall not be available in conjunction with any other provisions of the age relaxation rules.

Degrees / Experience Certificates / Testimonials of unrecognized institution are not ii) accepted. Only original Degrees / Certificates are accepted, however, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective institution. The candidates shall have to produce original degrees / certificates till last date of interviews. Detail Marks Certificates shall necessarily be

required and these should be attached with the application forms.

The candidates are required to apply on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Only one application will be sufficient for the above posts, the candidates intending for different categories mentioned above should however indicate the categories/quotas in the application form. The application Fee is Rs.285/- for all candidates. In addition to application fee, the candidates will have to pay Rs.15/- on account of Bank charges. Application form obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The application on plain paper or photostat shall not be accepted. Incomplete applications if not supported by requisite documents or late applications shall also be rejected.

Candidates can also apply online through the Commission's website (www.kppsc.gov.pk). However the application fee needs to be deposited in State Banks of Pakistan or a National Bank of Pakistan Branch under head of account No. CO2101- Organs of State-Examination Fee of KP PSC through Challan on or before the closing date. The same alongwith attested copies of all the documents

need to be submitted to the Commission within 10 days.

Applications must be submitted within stipulated time as no extra time is allowed for v) postal transit. Applications if posted on the last date must reach the Commission's office by the closing hours.

Applicant's married to Foreigners are considered only on production of the Govt: Relaxation Orders.

vii) Employees of Govt:/ Semi-govt/ autonomous/ semi-autonomous bodies may apply directly but their departmental permission certificates shall reach the Commission Office within 30 days of the closing date.

viii) The District wise allocation and Quotas shall be strictly followed in the filling of vacancies. Government reserves the right to fill or not to fill any post.

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Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications, pay scale and nomenclature of post shall be ineligible.

SPECIFIED BRANCHES OF THE NATIONALBANK OF PAKISTAN.

(1) Main Branches of: Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and

Saddar Road Branch, Tehkal Payan Branch, G.T Road (Nishtar Abad) Branch and (2)

University Campus Branch Peshawar.

Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch (3) Mingora and City Branch Tank

> (SHARIF HUSSAIN) Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar









新建立公司 等於其本的人都不必要不知人

Subject:

INTER-SE MERIT POSITIONS OF RECOMMENDEES FOR THE POST OF ASSISTANT SUB-INSPECTORS (BPS-11) IN POLICE DEPARTMENT (ADVI:NO. 04/2014)

S No.	Medi	Name with Father's Name		
	Order	Manie Man Lando 2 Manie	Olstrict	Cuota
1.	1	Astral AL S/O Muhammad Khan	Shanela	Gereral
2 .	2	Favcog Al-S/D Chaman Khan	Mardan	Gereial
3.	3	Shahif Alam S/O Noor Rahman	Mardan	Gereiai
4	4	Taxseel Khair S/O Wazir Baushah	Love Or	
<u>5</u> .	5	Syed At Abbas S/O Syed Shan Hussam Shan	Peshave	Geresal
6	ά	Alan Ahmad S/O Yousal	Peshavar	Ceresi
7.	7	floor Muhammad S/O Silvandar Khan	Kohistan	Cereral
8	6	Artab Taj Harger S/O Argab Hayal Uliah	Peshana	Ceneral
9	¢	Ansai Ahmad S/O Izhai Ahmad	Mardan	Gereral Gereral
10	10	Ali Kamran-SiO Atxiul Rauf	Bannu	
11,	11	Anlia Hawab D/O Hawat Ali Khan	Peshavar	Cereial Female
12	12	trayat Ulah Khan S/O Aurangzeb	Shancla	Cereral
13.	12	Saf Ultan S/O Hussain Khan	Novshora	Germal
14.	14	Hauman Khar, 5/0 Shah N az Khan	Panne	Cereal
15	ηÇ	Muhammad Yaseen All StO Sher Muhammad	Charsadda	Ceneral
16,	16	Muhammad Faisal S/O Munii Althlar	Rowstera	Gereral
17,	17	Asad Ullah S/O Ibadat Jan	Upper Dir	General
18	16	Ajmal Hayai S/O Sancbar Khan	Perpays:	Ceresi
19.	15	Yash Arala; S/O Sad ka:lin	Mardan	Cereral
70	20	Arlar Alam S/O Abdul Nasir Khan	Chital	General
21.	21	Asif Khan S/O Faseeh ud din	Peshawar	Cereral
22	22	Avhar Ullah Khan S/O Alam Khan	Swall	Gereral
23.	23	Tuseof ur Rehman S/O Sail ur rehman	Abtoliabed	
24.	24	Syed Miglaba S/O Shah Jehan	Cuner :	Gereial Gereial
25.	25	Sahibzada Irman S/O Muhammad Zada	Love: Da	Gereial
26.	26	Faheem Ahmad S/O Hasil Khan	Fevel Dit	Ceretal
27.	27	Havi Field S/O Feed Ullah Shat.	Kzizk	
28.	2E	Adıl Anayal S/D Anayal Wah	Upre Dir	Ceneral
29. i	75	Muhammad Aluf Anjum SIO Muhammad Ibrai Anjum	Peshavar	Gereial Gereial
30.	3C	Syed Fahad SIO Syed Javed Hussain Shah	Abbonated	Gereial
31.	31	Faheem Shah S/O Almai Shah	Peshauar	Cereial
32.	32	Ahsan Khan S/O Muhammad Arshad	Atboliatad	Gereral
33.	32	Estac Ullah 5/O Amin Ullah	Euner	Geresa Geresa
34.	34	Abdul Aziz SIO Abdul Ghan:	Pesha <i>u</i> ar	Cereal
35.	35	Syed Mehar 'All Shah S/O Wuhammad Al Shuh	Dit Fover,	Ceneral
36.	3é	Masceb URah Shah S/O Mühammad Ali Shah	Eznru -	Germal
37.	37	Ahsan lishad S/O kshad Khan	Abbottated	
	38	Italiz ud din Khatak SVO Salah ud din Khatak	Roastera	General General
39.	39	Fazal Hadi S/O Nunzar Khan	Kohistan	General
40.	\$C	Dishad Part D/O Syed Aziz Wali Shah	Chiral	Female
41.	41	Abdulah SAO Asmai Ullah	Charsadda	General
42	42	Mand Khan S/O Arif Khan	Abbotlatiad	Cereal
43.	43	Fawad Yousal S/O Nisar Yousal	Mardan	Gereral
44.	44	Ahsan Shakou S/O Abdul Shakou	Attollatag	Gereral
45.	1;	Muhammad Bakhilar 5/0 About Khanani	Cattl Marwet	Ceneral
46.		Muhammad Imran S/O Ghuram Yayeen I	D.I.Khan	Ceneral
47.	47	Wald All Khan S/O Zard All Khan	Eannu	Ceresi
48.	15	Muhammad Khubaib Walee S/O Fazal ur Rahman Baloch	D.I.Khan	Cereal
49.	16	Jawad Khan SJO Bahrawar Sald	Lower Dir	Cereial
50.	SC	Rywan Ullah Khan S/O Hasrulah Khan	Upper Da	Gereral
51, 1		Ami Riaz S/O Raz Al Shah	Maidan	Cereial
57. 1	-	Mustassar Ighal 5/0 Ratini Gul	Peshanzi	Gereral
53.		Wuhan mad Shah Zeeshan (ghal SiQ Gulam Rabbani Khan		Gereral
54	54	Intekhat: Alam SAD Muhammad Alam	Pesnaue	Gereral
55. I	55	Wagar A1 SIO Rashid Ali	Swat	Gereial
56.	5ć	Sail Ullah SiO Noor Faraz Khan	Lover Dir	
57.	57	Muhammad Asim S/O Sam u: Hag	Mardan	Cereral
58.	5E	Favan Ashral S/O Muhamman Ashral	Abtollated	Ceneral
	<u> </u>	1 2 2010 010 010 0100 01000	LUVOINT CO.	Coreral

Attested True

·		111		•
59	55	Ordan Ali Shah S/O Muhammad Yousel	Chra/	General
60.	36	Saddam Hussain S/O Shat, Jahan	D.I Khan	General
62	61	Agib Khan SrO Khan Mchammad	Peshawar	General
63	63	Adnan Ahmad SIO Niaz Muhammad Khan	Kona:	Cereal
64.	61	Sana Ullah Khan SrO Muhammad Ayut Khan Zuhaib Arshad SrO Falek Kaz	DIRtan	General
65	Pč.	Favan Ahmad Tang S/O Adhul Samad	Upce: Da	Ceneral
66.	6¢	Ashar Mushlag S/O Muhammad Mushlag	Mardan	General
67.	67	Adeal Rafique S/O Muhammad Rafiquo	Mansetra	General
68,	68	Nuhammad Alam Khan S/O Chulam Rehman	Barnu	Селска
69.	66	Suchan Utah S/O Muhammad Sald	Lawer Dur	General General
70 71	70	Rafful ah Khan StO Abdul Manan Khan	Latel Marwal	General
72.	71	Muhammad Hamid Al S/O Ghafar Al:	Charsanda	Geresal
73	73	Asad Urlah S/O Barker All Shor	Peshawar	Ceneral"
74	72	Khailcuz Zaman SfO Qamaruz Zaman Araib Aamir SfO Aamir Habib	Buner	Gereral
75	75	Syed Nasser up Deer S/O Syed Haroon or Rasheed	Marselva	Gorceal
76	76	Walk Muhammad Shoaio S/O Sultan Muhammad	Bun≙i	Cereal
77.	77	Withammad Imitiaz S/O Muhammad Juma Khan	Attoliatas Chival	General
18	78	Hasr Khan S/O Sultan Muhammad	LONG DA	General
79.	75	Wagai Ahman S/O Izzai Khan	Karak	General General
80	8C	Muhammad Farocq S/O Habib Ulian	Biruei	General
81. 82.	91	Ast Mudaser S/O Muhammad Zubati	Lower Dir	Cereal
B3.	82 83	Anwar Ulah Khan 5/0 Inayar Ulah Khan	Lakki Manyat	General
B4.	84	Shah Saud S/O Mascod Khan Noor Sabih Ulah S/O Hamid Li Rehman	Peshawar	Gercial
85	85	Adnan Rehman S/O Gul Rehman	Chital	Gereral
86.	St	Laz Al Khan S/O Gohai Ali Khan	Charsadda	Gereral
87	87	Syed Magsocs All Shah S/O Zulligar All Shah	Mardan Mansehia	General
B8	SE	Dilawar Ali S/O Liagal Ali		Gereial
89.	90	Rasi Khan S/O Muhammao Zahii Khan	Abtoliatad	Cereal
90.	91	Eatht Rashad S/O Room Shad	Lewes Dar Burner	General
91	93	Merajud on S/O Fazai Kadim Khan	Chital	General General
92.	94	Amit Manzoor S/O Mahammad Manzoor	Kohisten	Cereal
93.	95	Muhammad Usman Khan S/O Muhammad Zahir Khan	Peshawar	Ceneral
94.	96	Muhammad Tayyab S/O Zar Uhan	Tionstera	Cereal
95 96	97	Muhammad Momin Khan S/O Muhammad Riaz Khan	Bannu	General
97.	95	Walous Rehman S/O Zahidus Rehman	Banne	General -
98.	100	Haliz ed din S/O Sangeen Khan I/ynammad Insces S/O Satyr Jami	Upper Dir	Cereial
99.	101	Syeti Ali Raza Shah S/O Syeti Aliam Shah	Karak	Cercral
100.	102	Andarsh Malmar S/O Khadim Shah	Chra	Cereal
101.	103	Shehzad Ali Khan S/O Aktrai Ali Khan	Peshanar Peshanar	General
102.	104	Arsalan Khan S/O Muhammad Igrees	Swate	Geresal Geresal
103.	105	Adnan Waheed S/D Abdul Waheed	Charsacda	Ceneral
104.	106	Irishac Umer S/O Muhammad Umes	Peshawar	General
105.	1()	Asim S/O Habib Ullah Khan	Banny	General
10±.	IEB	Faheem Atbas S/O Gulam Qasim	D.I.Khan	Geretal
107.	109	Hisar Atman SIO Hazar Atmag	Chira	Cereral
109,	112	Abasin Baryal S/O Said Bahadur Salman Ahmad S/O Mushlag Ahmad	LOVE DE	General
110	113 .	Nuhammad Subhan Ulah S/O Khan Baoshah	Love Dr	Ceneral C
111,	114	Wunit Ahmad SiD Root Wall Khan	Peshava: Chitral	General
112.	115	Abdulah S/O Haji Muhammag	Chta	Cereal
112.	116	Zoharb All Khan S/O Zar Zarrin Khan	Love: D:	General General
114,	117	Wudassi: Hayal S/O Siral ul Haq	Pechawat	Ceneral
115.	118	Mast Dai S/O Muhammad Ayub	Love Di	Cercal
11¢	119	Syed Lyas S/O Syed Swal Shah	Charsadda	Cereal
117.	131	Nuhammad Basil Shah S/O Azad All Shah	Barme	Gereral
11 <u>E.</u> 119	122	Numeri Ul Han S/O Aboul Han	Chta	Cereal
125.	123	Shahzad Ali Syed S/O Syed Karim Ali Shah	Chara	Cercial
121	125	Maid Khan 5/O Sanab Gul Shamsur Rahman S/O Haj Murad	Peshawar	Cereal
122	126	Faisal S/O Ali Bahadai Khan I	Chua	Gererai
123.	127	Muhamman Ismall SiO Abour Rasheed	Buner Consti	General
124	128	Arg! Khan S/O Nawab Khan	Swats Pesharras	Ceneral
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127.	131	The description Sail (c) Dip 2/O Kirbammad Ryam and DC	Manseiva . Chitral Can	General
128.	132	THE STILL WINDS DAY WELLING KHAN	Peshavar	Cencral
129.	133	Bland lobal S/O Muhammad Zaman	Kelssian	General
130.	134	THEM A Khan SID Muhammad Penics Khan Aven		Central
131,	135	Harmania (1933) Omeshi Si Nazar Hensein Charles	i Manselva	General
132.	136		Charsacda	Ceneral
133.	137	Abdul Waheed S/O Abdul Rusheed	Latti Marwat	General
134.	138	Muhammad Laz S/O Muzalfar Hussain	Sival	. General
135.	140	1 Shar Saud Khan S/O Hamkh Cul	Charsanda	General
	142	Syen Sansamul Mem Shar, SKI Syet 1 alt rul Mem Shan	Manselva	General .
136.	743	Sana to Rahman S/O Han Ltd Rahman	Love Dit	i Ceneral
137.	144	1 Wasim Salad Khan S/O Khan Zaman		Ceneral
138.	145	1 Maseor Khan 5/O Abdu Malit	Lakki Marwal	Ceneral
139.	146	Fahad Zaman Khan S/O Fida Muhammad	Howshera	General
140	150	ham Ulah S/O Aabid Ulah	Swats	General
141.	151	Inam Ulah Khan S/O Aman Ullah Khan	FC/AGA DIS	General
147.	157	Dasim Zaman S/O Faza: Zaman	Lakki Marwat	General
143.	153	Hajeeb Ullah Khar S/O Naimat Ullah Khan	Howshera	General
144.	155	Abid Ullah S/O Hambi Ullah	D.I.Khan	General
145.	156	Apper or Debras CO III	D.I.Khan	General
146.	157	Anecs ur Rehman S/O Muhammad Youngs Khan	Lakki Manyat	General
147.	15R	Naveed Ahmad S/O Khaista Muhammad	Buner	General
148.	159	Hawat: Zada S/O Said Khan	Upper Cir	General
149.	160	Muhammad Saddam Riaz S/O Muhammad Riaz	Peshawar	General
150.	161	Muhammad Rasii S/O Habib ur Rehman	Charsaeda	Селеза
151.		Rizwan Utah S/O Mukhtler Muhammad	Peshawar	General
152	162	Muhammad Aliati Alam S/O Falal Sher Khan	D.I Khan	General
153,	165	Hazii Muhammad S/O Muhammd Gul	Peshawai	
	16B	Khizer Fareed S/O I/uharrmad Fareed	Kchai	Ceneral
154	169	Muhammad Talmur S/O Adam Khan	Latti Marwat	General
155.	171	Sadcam Hussain S/O Syed Chan Shah	Hariput	General
<u>54.</u>	173	Tang Ulah S/O Shahbaz Khan	Peshavar	Geneal
157.	174	Muhammad Blial S/O Fazie Suthan		General
158.	176	Salman Lateet S/O Lateet Khan	Peshavar	General
£9.	177	Sam Ulah Khan S/O Haji Abdu Lalif Khan	Peshawar	General
60.	160	Muhammad Iyas S/O Muzaffai Hussain	Tank	Concrat
61.	163	Asghar Ali Khari S/O Liagat Ali	Swat	Cencral
ω. ·	IE4	Faizan Salar S/O Abdul Salar	Peshawai	General
63	182 ·	Muhammad Ishliag S/O Muhammad Raffo	Karak	Ceneral
64.	187	Shahizad All S/O Habib Khan	Peshawar	General
é5,	168	Syed Zohalb Ejaz 5/0 Ejaz Hussain Shah	Buner	General
éb.	169	Bi'al inayat S/O Inayat Ullah	Hatiput	General
ć7.	151	Orale Mana Service Linds	Upper Du	General
69,	192	Ozali Khan S/O Zain ul Atideen	Peshawar	General
69.	195	Syen Yousaf di Hassan Muhasiya S/O Syed Ikrdan Fussain	Налриг	General
70	197	Salman Tahir, S/D Tahir Tasleem	Swate	Cencral
71.		Gaubar Relaman S/O Baltramand Khan	Buner	General
72	158	Syed At Imian S/O Syed Imian Shah	Peshawai	General
	159	Kilayai Ullah SiO Nasi Ullah	Peshawar	
73.	205	Yask leba: S/O Muhammad lebal	Peshawai	General
74.	20B	Akcar Syeo S/O Men Sald Ambar	Swal	General
75	210	Ejaz ul haq S/O Irlan uo din	Atta Dir	General
	211	Abdul Latil Kran S/O Adil Khan	Swet	General
			7 Po Pol	LEADAIN
76. 77.	217	Alao Ahmad S/O Muhammad Azgerr		Ceneral
77. 79.		Alao Ahmad S/O Muhammad Azgerr	Nurshera	General
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77. 78. 79 60.	217 220 230 222 236	Alao Ahmad S/O Muhammad Azeem Zeshan Zahoor S/O Zahoor Ullah Khan Hazral Ahuzar S/O Rahim Ullah Réglo Bib: C/O Chulam Khan Islay Ahmad S/O Acdul Rehman	Norshora Karak Konistan Hanpur Konistan	ලිගෙනු ලගෙනු ලගෙනු
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77. 78. 79 30. 11. 12.	217 220 230 222 236 238 241 242	Alao Ahmad S/O Muhammad Azeem. Zéeshan Zahoor S/O Zahoor Uilah Khan Haztal Ahuzar S/O Rahim Uilah Régio Bibi D/O Ghulam Khan Islau Ahmad S/O Acdul Rehman Muhammad Zada S/O Haztal Khan	Norshera Karak Konkstan Hanpur Kohistan Upper Dir	General General General Female General

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DIRECTOR EXAMINATION

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POLICE DEPARTMENT

ORDER

On approval by the Public Service Commission, Khyber Pakhtunkhwa vide letter No.KPK PSC Exam 2016/002330, dated 01.02.2017 received from CPO Peshawar vide Memo: No.891-97/E-III, dated 13.02.2017, the following 16 candidates (15 in 25% quota and 01 in 19% quota) are hereby appointed as probationer Assistant sub Inspectors from the dates, allotted range numbers and posted to the districts as noted against their names:

S#	Name & father name	Date of		Place of Posting
4		appointment	Number	
1.	AliKamran S/o Abdul Rauf	13.02.2017	2/8	District Bannu
2.	Nauman Khan S/o Shah Niaz Khan	13.02.2017	5/8	District Bannu
3.	Masibullah Shah S/o M Ali Shah	13.02.2017	G/8	District Bannu
4.	Muhammad Alam Khan S/o Ghulam Rahman	,	8/8	District Bannu
5.	Muhammad Momin Khan S/o Muhammad riaz Khan		14/8	District Bannu
6.	Wajid ur Rehman S/o Zahid ur Rehman	13.02.2017	15/8	District Bannu
7.	Asim S/o Mabibullah Khan	13.02.2017	17/8	District Bannu
8.	Muhammad Basit shali S/o Azad Ali shah	13.02.2017	19/8	District Bannu
9.	Muhammad Bakhtiar Shah S/o Azad Ali Shah		20/8	District Lakki
10.	Khan	13.02.2017	22/8	District Lakki
11.	Abdul Waheed s/o Abdul Rasheed	13.02.2017	25/8	District Lakki
12.	Wasim Sajjad s/o Khan zaman	13.02.2017	27/8	District Lakki
13.	Inamullah Khan s/o AManullah Khan	13.02.2017	29/8	District Lakki
14.	Anees ur Rehman S/o Muhammad	13.02.2017	30/8	District Lakki

District Bannu Necessary gazette notification subject to medical fitness, verification of antecedents and verification of documents/ testimonials from the concerned board/ university under the relevant rules and prescribed manner may be issued/ made under intimation to all concerned.

13.02.2017

13.02.2017

They may be informed accordingly.

Muhammad Ali Khan PSP Regional Police Officer, Bannu Region, Bannu

District Lakki

No. 732-36/EC dated 23.02.2017 Copy to;

Youngs Khan Muhammad

Khan

Taimur

16. Dil Baz Khan S/o Jahan Sardar

S/o

- 1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar for information w/r to CPO Peshawar Memo No.891-97/E-111 dated 13.02.2017.
- 2. The District Police Officers, Bannu and Lakki for information and n/a.
- The SSP/ Investigation Bannu and Lakki for information.

Muhammad Ali Khan PSP Regional Police Officer, Bannu Region, Bannu

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POLICE DEPARTMENT

-: earner rieds stalings beton as attitude of to betack their remer: appointed as Probationer Assistant Sub Inspectors from the dates, allotted range following 16 candidates (15 in 25% quots and 01 in 19% quota) are hereby received from CPD Peshawar vide Memo; No.891-97/E-III, dated 13,02,2017, the Pakintunkhwa vide letter No.KPK PSC-Exam-2015/002330, dated 01,02,2017 On approval by the Public Service Commission, IGryber

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be issued/made under intimation to all concerned. concerned board/university under the relevant rules and prescribed manner imay verillication of antecedents and verification of documents/testimonials from the. Recessary gazette notification subject to medical fitness,

They may be informed accordingly.

Bannu Region, Bannu Regional Police Officer, (WITH YAKAND ALI KMAR) PSP

732 - 36 FEC, dated 23 rovious

1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar for Information wir to CPO Peshawar Memo: No.891-97/E-ill Gased 13.02.2017.

Wit to CPO Peshawar Memo: No.891-97/E-ill Gased 13.02.2017.

The Sapvinvescigation, Bannu and Lakki for information.

四日の大井 Benny Acglon, Benny Regional Police Officer, (MUHAMMAD ALI KHAM) PSP

ORDER:

On completion of probationary period satisfactorily in light of the recommendation of DPO Lakki Marwat vide letter No.2342/EC dated 22.05.2023, the following PASIs of Bannu Region are hereby confirmed as ASIs with their colleagues_under Police Rules 19.25(5), Standing Order No.10.2014 and CPO Peshawar letter No.CPO/CPB/64 dated 13.02.2023 w.e.f 13.02.2020 (date of completion of three years probationary period) and their names also brought on promotion list-E from the date of their confirmation i.e 13.02.2020.

PASI Inam Ullah No.52/B

- PASI Ances-ur-Rehman No.89/I3
- PASI Bakhtiar Khan No.103/B 3.
- PASI Wascem Sajjad No.56/B 4.
- PASI Anwar Ullah No.22/B
- PASI Abdul Waheed No.25/B 6.
- PASI Taimur Khan No.42/B

Necessary gazette notification may be issued under intimation to all

concerned.

Bannu Region,



The District Police Officer, Henry The District Police Officer, Lakki Marwa

No. 2225-ZoliC, doted Hannu the // /07/2023

Subject:

DEC MILETING POIL PROMOTION OF ASIS ON LIST-R TO THE RANK OF SUB-INSPECTORS.

Memo:

it is intimated that DPC meeting for promotion of confirmed ASIs of Banau Region on list-fi to the rank of Sub inspectors will be held on Thursday 13.07.2023 at 11:00 hours in the office of the undersigned, wherein, cases of the following ASIs will be considered under the relevant rules. You are hereby directed to attend the said meeting on due date & time;

ا			i and the second of the second
1 5	S.#	Nume, Runk & No.	Place of posting
	. \\\ \A8	l Munavur Khan No.09/B	CTD, N.W (Undergone Upper College Course at PTC Hangu)
2	. / As	I Abdur Rushid No.70/B	Operation Staff Bannu
3.		I Farid Ullalı No.92/II	Operation Staff Bannu
4.		I Asmat Ulloh No.50/B	Investigation Staff Lakki
5.		Muhammad Ajmal No.41/B	Investigation Stall Lakki
6.	۸S	I Muhammud Tahir No.57/B	Investigation Staff Bannu
7.	۸S	Ghulam Razaq No.51/B	Operation Staff Lakki
8.	ΛS	Saif ur Rehman No.64/13	Operation Staff Lakki
9.	AS	Pasham Khan No.53/13	Operation Staff Bannu
10	. AS	Nawab Khan No.85/13	Operation Staff Lakki
11	. AS	Karim Khan No.07/B	Operation Stuff Lukki
12.	ASI	Mir Tajum No.111/l)	Operation Staff Bannu (Undergone Upper
12.		<u> </u>	College Course at PTC Hangu)
13.		Muhammad Shah No. 14/B	Operation Staff Lakki
14.		Almar Khan No.80/IJ	CTD Bunnu
15.		Muhammad Yosaf No.82/B	Operation Staff Lakki
16.	ASI	Abdul Jalil No.83/B	Operation Staff Bannu
17.	ASI	Abdul Qayyum No.81/B	CID Banni
18.	ASI	Shafeed Ullah No.04/13	CTD Bannu
19.		mtiaz Khan No.25/i3	PTC Hangu
20.		Sher Ali No.102/B	CTD Bannu
21.	ASTS	ami Ullah No. 123/B	Investigation Staff Lukki
			CTD, N.W (Undergone Upper College Course
22.	ASI /	bdui Hamced No.28/B	at PTC Hangu)
23.	ASIF	ilabaz Khan No.36/II	Elite Force, Bunns
24.		auman Khan No.71/B	CTD Bunnu
27.	1		Operation Stuff Bannu (Undergone Upper
25.	ASI N	sib Ullah Shah No.44/H	College Course at PTC Hangu)
26.	10154	uhammad Bukhtiar No. 103/13	CCP Peshawar
	7131 W	ajid Ali Khan No.43/B	PTC Hangu
27,	V21 M	alid Ali Khan iyo, ioib	
28.	ASI M	uhammad Alum Klum No.55/B	Operation Staff Bannu (Undergone Upper
			College Course at PTC Hangu)
29.		iwar Ullah Khan No.22/II	Operation Staff Lukki
30.		ajid-ur-Rehman No.65/B	Operation Stuff Bunnts
31.	ASI As	im No.76/B	Operation Staff Bannu
-,			/ Page 5 mf7

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	l de la companya de l	16	
14. ASI Wasim Sajjad 35. ASI Inam Ullah K	No.56/B hun No.52/B	Operation Staff Bannu Operation Staff Lakki Operation Staff Lakki	
37. ASI Muhammad T	aimur No.42/B	Operation Staff Lakki Operation Staff Lakki Operation Staff Lakki	
No. 2227-35 EC, da	ated Bannu the	Regional Po Bannu l /07/2023	Region, nu
Copies to;- 1. The Commandant, PTC 1 2. The Capital City Police C 3. The District Police Office 4. The SsP/Investigation, Ba 5. The SsP/CTD, Bannu & N 6. The SP/Elite Force, Bannu	Hangu. Officer, Peshawar, ers, Bannu & Lakki M unnu & Lakki Marwat Vorth Waziristan.	The above officers of Districts/Units deputation to may be direct	manual parties
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On approval of the Departmental Promotion Committee in its meeting held on

13.07.2023 in the office of the undersigned, the following confirmed ASIs of Dunna Region on List "E" are hereby promoted to the rank of Officiating Sub Inspectors under Police Rules, 13.1, 13.4 (2), 13.12 (1) & 19.25(A).

		1
_ S.#	Name, Rank & No.	District/Unit
l.	ASI Abdur Rushid No.70/B	Operation Staff Bannu
2.	ASI Muhammad Tahir No.57/D	Investigation Staff Danna
3.:	ASI Ghulam Razaq No.51/B	Operation Staff Lukki Marwat
4. 5.	ASI Saif ur Relunan No.64/B	Operation Stuff Lakki Marwat
5.	ASI Pushum Khun No.53/B	Operation Staff Lakki Maravat
6.	ASI Nawab Khan No.85/13	Operation Stuff Lakki Marwat
7.	ASI Abdul Qayyum No.81/B	CTD Banton
<u>8</u> ,	ASI Sher Ali No.102/B	CTD Bannu
9.	-ASI Dilahaz Khun No.36/B	E.F. Khyber Pakhtunkhwa
la.	ASI Nauman Khan No.71/B	C'I'D Bannu
11.	ASI Nasib Ullah Shah No.44/B	Operation Staff Bannu
12.	ASI Wajid Ali Khun No.43/B	Police School of Traffic &
13.	ASI Muhammad Alam Khan No.55/B	Telecommunication, Kohat Operation Staff Banna
14.	ASI Wajid-ur-Rehman No.65/B	Operation Staff Banau
15	ASI Asim No 76/B	Operation Staff Barmu

Necessary gazette notification may be issued under intimation to all concerned.

Regional Police Officer Banna Region,

No. 2283-88/EC, dated framu the / 9 /07/2023

Copies for information to:-

The Danuty Communicant Hills Loren Klivber Pakhtunkhwa Peshawat-

Action

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The Provincial Police Officer, .
KP, Peshawar.

Subject:

APPEAL AGAINST OFFICE ORDER NO. 2283-88/EC

DATED 14-07-2023 OF RPO BANNU REGION BANNU
WHEREBY COLLEAGUES OF APPELLANT WERE
PROMOTED TO THE RANK OF OFFICIATING SUBINSPECTORS AND APPELLANT WAS IGNORED BEING
ONE OF THE SAME BATCH FOR NO LEGAL REASON.

Respectfully sir,

- 1. That on 18-07-2014, the department placed 263 posts for appointment of Probationer Assistant Sub-Inspectors in the Commission and the same were then advertised on the aforesaid date.
- 2. That after going through the prescribed procedure, the Commission recommended numerous incumbents, wherein name of appellant was figured at S; No. 45 vide order dated 01-02-2017.
- 3. That in pursuance of the aforesaid recommendation of the Commission, RPO Bannu Region Bannu issued appointment order dated 23-02-2017 figuring name of appellant at S. No. 09 along with colleagues.
- 4. That on satisfactory performances of the official duties, appellant was confirmed on 13-02-2020 after completion of 03 years' probation period by bring his name on promotion list "E" from the date of his confirmation i.e. 13-02-2020 and his name was figured at S. No. 03.
 - 5. That on 11-07-2023, RPO Bannu Region Bannu wrote letter to DPO Bannu as well as Lakki Marwat to remit the names of eligible ASI's for promotion to the rank of Officiating Sub-Inspector. The name of appellant was figured at S. No. 26 along with his colleagues.
 - 6. That on 14-07-2023, RPO Bannu Region Bannu promoted candidates to the rank of Officiating Sub Inspectors but the name of appellant was not figured in the list, however, his colleagues names were figured from S. No. 10 to 15, thus made discrimination.

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- That strange enough, colleagues of appellant were promoted to the rank of Officiating Sub Inspectors B-14 but the name of appellant was droped from the order of promotion.
- 8. That process of further promotion to the rank of Officiating Sub-Inspector was initiated by the department but appellant was deferred time and again for no legal reason but due to malice.
- 9. That similarly and equally placed persons be treated alike under the law as well as the judgment of the apex court but no such treatment was extended to appellant.
- 10. That no reason, of dropping whatsoever, was given in the promotion order of appellant thus discriminated.
- 11. That the promotion order dated 14-07-2023 ignoring appellant from promotion to the rank of Officiating Sub-Inspectors is not per the mandate of law, rather based on malafide.

It is, therefore, most humbly requested that order dated 14-07-2023 by promoting colleagues to the rank of Officiating Sub Inspector be reviewed / modified and appellant be promoted to the said rank with all service benefits from the said date with all service benefits.

Appellant

Bakhtiar Khan No. 103/B

Assistant Sub-Inspector Lakki Marwat.

Cell No. 6316-1950194 .

Dated 24-04-2024

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BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Misc. A. No.

/2024

. *IN*

S. A. No.

/2024

Bakhtiar Khan

versus

RPO & Another

<u>APPLICATION</u> **FOR DIRECTION** RESPONDENTS TO NOT **MAKE** PROMOTION OF THE ASSISTANT SUB-<u>INSPECTORS</u> TO THE <u>RANK</u> **OFFICIATING SUB-INSPECTORS B-14 TILL** THE FINAL DISPOSAL OF THE CASE:

Respectfully Sheweth,

- That applicant filed the subject appeal before this hon'ble Tribunal 1. today for promotion to the rank of Officiating Sub-Inspector but no date is yet fixed.
- 2. That respondents are going to make promotion to the rank of Officiating Sub-Inspectors as per letter dated 19-07-2024, while the same subject matter is sub-judice is before the hon'ble Service Tribunal by ignoring appellant in the earlier round / DPC's, while the aforesaid subsequent letter is again issued on 19-07-2024 for the purpose. (Copy Attached)
- That if such promotion is made out then once again appellant be 3. compelled for litigation.

Date: 23-07-2024

It is, therefore, most humbly requested that the application be accepted as prayed for.

Applicant

Through

Saadullah Khan Marwat

Advocate

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Misc. A. No.

/2024

ΙN

S. A. No.

/2024

Bakhtiar Khan

versus

RPO & Another

<u>AFFIDAVIT</u>

I, Bakhtiar Khan, Applicant, do hereby solemnly affirm and declare that contents of **Application** are true and correct to the best of my knowledge and belief.

DEPONENT

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From:

The Regional Police Officer, Bannu Region, Bannu

To: 1)

1) The Commandant, PTC Hangu

The Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa Peshawar

The Regional Police Officer
D.I. Klan Region, D.I. Khan

4) The Regional Police Officer, Mardon Rosium Mardan

5) The Deputy Commandant,

Elije Force, Khyber Pakhtunkhwa Peshawar

6) The District Police Officers, Bannu & Lakki Marwat

7) The Ssl/Investigation, Bannu & Lakki Marwat

8) | The SsP/CTD, Banna Region & North Waziristan

2845-53

MC, dated Bannu, the

19/07/2024

Subject:

DPC FOR PROMOTION OF ASIS ON LIST "E" AS OFFG: Sts.

Memo:

A DPC meeting for promotion of the following ASIs of Bannu Region on list "E" as Offs: SIs, under relevant Police Rules of your respective districts/units is to be held in this office shortly against the existing vacancies in Central Units:

S.#	Name, Rank & No.	Present Posting
1.	ASI Muhawar Khan No. 09/B	CTD/NW
<u>2</u> . 3.	ASI Mujabar Khan No.112/B	¹ Inv: Lakki Marwat
3	ASI Abdul Ghani No. 143/B	Ops: Bannu
1.	ASI Syed Nawaz No. 17/B	Inv: Bannu
5	ASI Abdul Majeed No. 147/13	Ops Bannu
6;.	ASI Nemer Khan No.148/B	CTD KP
7: 1	ASI Akhio Jan No. 38/B	Ops: Lakki Marwat
8. :	ASI Hariza Ali No. 39/B	Оря: Ваппи
9.	ASI Relimat Ullah No. 05/B	PTC Hangu
10:	ASI Firdous Khan No. 263/B	EF KP
11:	ASI Nambiaz Khan No. 264/B	Ops: Bannu
127	ASI Ijaz Ahmad No. 265/B	Ops: Bannu
13.	ASI Muhammad Farooq NO. 299/B	Ops: Lakki Marwat
14.	ASI Rati Ullah No. 268/B	Ops: Bannu
15.	ASI Shakeel Khan No. 269/B	Ops: Lakki Marwat
16.	ASI Insha Ullah No. 270/B	Ops: Lakki Marwat
17.	ASI Murad Ali Khan No. 271/B	Ops: Lakki Marwat
18.	ASI Mudasser Hayat No. 272/B	Ops: Lakki Marwat
19.	ASI Navid Ullah No. 273/B	Ops: Bannu
20. 21.	ASI Aşif Khan No. 274/B	Ops: Lakki Marwat
2.	ASI Injun Ullah No. 275/3	Ops: Bannu
22.	ASI Ininh Ullah Khan No. 276/B	Ops: Bannu
2J.	ASI Javid Khan No. 277/B	Ops: Bannu
24.	ASI Wallced Ullah No. 278/B	Ops: Lakki Marwat
25.	ASI Abdul Rauf No. 279/B	Ops: Bannu
26	ASI Irfan Ullah No. 280/B	Оря: Валли
27.	ASI Irlan Ullah No. 281/B	Ops: Lakki Marwat
28.	ASI Adil Zaman No. 282/B	Ops: Bannu
29.	ASI Auringzeb No. 283/B	Ops: Bannu
30.	ASI Asmai Ullah No. 284/B	Ops: Bannu
:		wps, pannu

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:		1	Ops: Lakki Marwat
31.	ASI Asif	qbal No. 285/B	Ops: Bannu
32.	FASI Sifar	11llah No. 280/D	Ops: Lakki Marwat
33.	ASI Hazn	n Usmin No. 287/B	Ops: Lakki Marwat
3:1	ASI Sajid	Khan No. 288/B	Ops: Lakki Marwat
35.:	ASI Javec	Rasoo No. 289/B	Ops: Bannu
36.	ASI Waji	I Khan No. 290/(3	Ops; Lakki Marwat
37.	ASI Miirs	hid Khan No. 291/B	Ops: Bannu
38.	ASI Anw	r Kamal No. 292/B	Ops: Bannu
39.	ASI Muh	mund Kashif Khun No. 293/B	Ops: Bannu
10.	ASI Mish	ah UD Din No. 294/B	Ops: Bannu
41.		awaz No. 295/B	
12.		at Ullah No. 298/B	Ops: Lakki
43.	ASI Zahio	l Ullah No. 296/B	Ops: Hannu
44.	ASI Javec	Khan No. 06/B	Ops: Bannu
45.	ASI Abid	Ullah No. 01/B	Ops: Bannu
46.		ımmad Bakhtiar No. 103/B	Ops: Lakki Marwat
		ar Ullah No. 22/B	Ops: Lakki Marwat
		i Waheed No. 25/B	Ops: Lakki Marwat
49.	ASI Wasi	m Sajjad No. 56/B	Inv: Bannu
50.	ASI luani	Ullah khan No. 52/B	Ops: Lakki Marwat
51.	ASI Anec	s-Ur-Rehman No. 89/B	Ops: Lakki Marwat
52.	ASI Muh	ammad Taimur No. 42/B	D.I. Khan Region
53.	ASI Fati	Ullah No. 300/B	Ops: Lakki Marwat ,
54.	ASI Hard	on Khan No. 297/B	Ops: Bannu
55.	A\$I Was	Ullah No. 301/B	Ops: Lakki Marwat
56.		ın Shah No. 68/B	Ops: Lakki Marwat
57:		eb Ullah No. 145/B	Ops: Bannu
587	ASI Muh	ammad Rehman No. 69/B	СТОКР
59.	ASI Haq	Nawaz No. 73/B	Ops: Lakki Marwat
60.	ASI Aziz	ur Rehman No. 11/B	Ops: Lakki Marwat
61.	Sher Kha	n No. 75/3	Mardan Region

It is therefore requested that their service records and information on the below proforma may be submitted to this office within two days positively so that the DPC meeting could be held well in time. No Departmental Inquiry Certificates of the above mentioned ASIs may also be provided. Furthermore, the above mentioned police officers may please be directed to complete last five years ACRs before the DPC meeting.

l li Da.		Marks in mandatory	Entry			Pending Departmental Proceedings
	nnk posting No.	training courses under Police Rules 19.25(A)	Good 13ad			
			QPM = PPM = CC-I = CC-II = CC-III =	Major	Minor	

Ports

Regional Police Officer, Bannu Region, Bannu

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