


FORM OF ORDER SHEET

Court of _____

Appeal No. 1042/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	25/07/2024	<p>The appeal of Mr. Anees ur Rehman resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 29.07.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

This is an appeal filed by Mr. Anees ur Rehman 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 Pakhtunkhwa Service Tribunal Act 1974 which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to 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. 412 /Inst./2024/KPST,

DC 22/7 /2024.

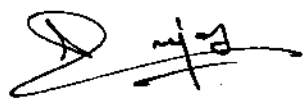


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Saadullah Khan Marwat Adv.
High Court Peshawar.

Sir,

Re-submitted after removing
objections.



25/7/24.

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

C. M. No. _____ / 2024

IN

S.A. No. _____ /2024

Anees-ur-Rehman

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
CHECK LIST

Case Title: Anees vs Rehman v/s Police Deptt,

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>سید انیس</u>	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	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?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
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?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
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: Sasdulehs Khan Marwat

Signature: [Signature]

Dated: 25/7/24

4

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A. No. 1042/2024

Anees-ur-Rehman

versus

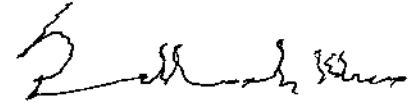
RPO & Another

INDEX

S. No.	Documents	Annex	P. No.
1.	Memo of Appeal		1-3
2.	Advertisement dated 18-07-2014	"A"	4-9
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

Appellant

Through



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. 1042 / 2024 **Pakhtukhwa
Service Tribunal**

Diary No. 14366

Dated 19-07-2024

Anees-ur-Rehman S/O M. Younas Khan

Assistant Sub-Inspector No. 89/B

Police Line, Lakki Marwat 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;

1. That on 18-07-2014, the department placed 263 posts before the Commission for appointment of Probationer Assistant Sub-Inspectors after advertisement the same. (Copy as annex "A")
2. That after going through the prescribed procedure of selection, the Commission recommended numerous incumbents, the name of appellant was figured at S. No. 145 vide order dated 01-02-2017. (Copy as annex "B")

Filed to-day

Registrar

19/7/24.

**Re-submitted to-day
and filed.**

Registrar

25/7/24.

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. 14 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. 02. (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. 36 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:-

GROUND S

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.
5. 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.

Anees

Appellant

Through

Saadullah Khan Marwat

Saadullah Khan Marwat

Arbab Saiful Kamal

Arbab Saiful Kamal

Amjad Nawaz

Amjad Nawaz

Advocates

Dated: 18-07-2024

CERTIFICATE:

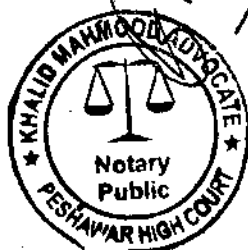
As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

Saadullah Khan Marwat

Advocate

AFFIDAVIT

I, Anees-ur-Rehman No. 89/B, Assistant Sub Inspector Police Line, Lakki Marwat (appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief



Anees

DEPONENT

KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION**2- Fort Road Peshawar Cantt:****Website: www.kppsc.gov.pk****Tele: Nos. 091-9214131, 9213563, 9213750, 9212897****Dated: 18/07/2014****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. **TWO HUNDRED & SIXTY THREE (263) MALE 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).

AGE LIMIT: 18 to 25 years.

Gender: Male

PHYSICAL

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

Chest: 33" x 34 1/2"

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	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).

Attd

AGE LIMIT: 18 to 25 years.**GENDER:** 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).**

QUALIFICATIONS: 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 34^{1/2}"

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.**

Arif

QUALIFICATIONS: 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:

1. 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 Feshawar	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.

Asst. Commr.

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		40%
Total		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:-

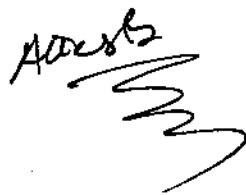
Psychological test shall be followed by viva voce exam to be conducted by the Public Service Commission. The candidate shall appear before the interview panel at the time of viva voce examination. Failure in or absence from viva voce shall mean that the candidate has failed to qualify the examination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

Adviser



GENERAL CONDITIONS

- i) Age shall be reckoned on **01/01/2015**. The candidates are required to be academically 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 Ex-employees 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.
- ii) Degrees / Experience Certificates / Testimonials of unrecognized institution are not 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.
- iii) 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.**
- iv) 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. **C02101- 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.
- v) Applications must be submitted within stipulated time as no extra time is allowed for postal transit. Applications if posted on the last date must reach the Commission's office by the closing hours.
- vi) Applicants 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.

Attested

- ix) 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 NATIONAL BANK 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 Mansehra
- (2) Saddar Road Branch, Tehkal Payan Branch, G.T Road (Nishtar Abad) Branch and University Campus Branch Peshawar.
- (3) Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and City Branch Tank

(SHARIF HUSSAIN)
Secretary
Khyber Pakhtunkhwa
Public Service Commission
Peshawar

AS

B



10

E

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.	Merit Order	Name with Father's Name	District	Quota
1	1	Ashraf Ali S/O Muhammad Khan	Shanida	General
2	2	Farooq Ali S/O Chaman Khan	Mardan	General
3	3	Shahid Alam S/O Iqbal Rahman	Mardan	General
4	4	Tawsool Khar S/O Wazir Baqir Khan	Lower Dir	General
5	5	Syed Ali Abbas S/O Syed Shah Hussain Shah	Peshawar	General
6	6	Afaq Ahmad S/O Yousaf	Peshawar	General
7	7	Hoor Muhammad S/O Sikandar Khan	Kohistan	General
8	8	Arbab Taj Waqar S/O Arbab Hayat Ullah	Peshawar	General
9	9	Anwar Ahmad S/O Iqbal Ahmad	Mardan	General
10	10	Ali Kamran S/O Abdul Rauf	Bannu	General
11	11	Aalia Hawab O/O Nawab Ali Khan	Peshawar	Female
12	12	Irfaan Ullah Khan S/O Aurangzeb	Shanida	General
13	13	Saf Ullah S/O Hussain Khan	Nowshera	General
14	14	Nauman Khar S/O Shah Nazir Khan	Bannu	General
15	15	Muhammad Yaseen Ali S/O Sher Muhammad	Charsadda	General
16	16	Muhammad Faisal S/O Mumtaz Akhter	Nowshera	General
17	17	Asad Ullah S/O Iqbal Jan	Upper Dir	General
18	18	Ajmal Hayat S/O Sanbar Khan	Peshawar	General
19	19	Yasir Arif S/O Saad Latif	Mardan	General
20	20	Azhar Alam S/O Abdul Nasir Khar	Chitral	General
21	21	Asif Khan S/O Feroze ud din	Peshawar	General
22	22	Arfar Ullah Khan S/O Alam Khan	Swat	General
23	23	Tuseel ur Rehman S/O Saif ur Rehman	Abbottabad	General
24	24	Syed Mujtaba S/O Shah Jehan	Buner	General
25	25	Sahibzada Imran S/O Muhammad Zada	Lower Dir	General
26	26	Faheem Ahmad S/O Hasib Khan	Lower Dir	General
27	27	Nasir Farid S/O Farid Ullah Shah	Karak	General
28	28	Adil Anwar S/O Anwar Ullah	Upper Dir	General
29	29	Muhammad Aamir Anjum S/O Muhammad Iqbal Anjum	Peshawar	General
30	30	Syed Farad S/O Syed Javed Hussain Shah	Abbottabad	General
31	31	Faheem Shah S/O Ajmal Shah	Peshawar	General
32	32	Ahsan Khan S/O Muhammad Arshad	Abbottabad	General
33	32	Ishad Ullah S/O Amin Ullah	Buner	General
34	34	Abdul Aziz S/O Abdul Ghani	Peshawar	General
35	35	Syed Mehar Ali Shah S/O Muhammad Ali Shah	Dir Lower	General
36	36	Naseeb Ullah Shah S/O Muhammad Ali Shah	Bannu	General
37	37	Ahsan Ishad S/O Ishad Khan	Abbottabad	General
38	38	Hafeez ud din Khalat S/O Salah ud din Khalat	Nowshera	General
39	39	Fazal Hadi S/O Manzar Khan	Kohistan	General
40	40	Dilshad Par S/O Syed Aziz Wali Shah	Chitral	Female
41	41	Abdullah S/O Asmat Ullah	Charsadda	General
42	42	Maid Khan S/O Anif Khan	Abbottabad	General
43	43	Fawad Yousaf S/O Nisar Yousaf	Mardan	General
44	44	Ahsan Shakoor S/O Abdul Shakoor	Abbottabad	General
45	45	Muhammad Bakhtiar S/O Abdul Kanan	Lahore	General
46	46	Muhammad Imran S/O Ghulam Yaseen	DI Khan	General
47	47	Yasir Ali Khan S/O Zaid Ali Khan	Bannu	General
48	48	Muhammad Khubab Waqar S/O Fazal ur Rahman Baqir	DI Khan	General
49	49	Jawad Khan S/O Bahadur Saif	Lower Dir	General
50	50	Rizwan Ullah Khan S/O Nasrullah Khan	Upper Dir	General
51	51	Amir Riaz S/O Riaz Ali Shah	Mardan	General
52	52	Mudasir Iqbal S/O Hakim Gul	Peshawar	General
53	53	Muhammad Shah Zeesha qbal S/O Gulam Rabbani Khan	DI Khan	General
54	54	Intekhab Aamir S/O Muhammad Aamir	Peshawar	General
55	55	Waqar Ali S/O Rashid Ali	Swat	General
56	56	Saf Ullah S/O Hoor Faraz Khan	Lower Dir	General
57	57	Muhammad Asim S/O Samir Haq	Mardan	General
58	58	Fazal Ashraf S/O Muhammad Ashraf	Abbottabad	General

Asst. Commr

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59	59	Laqat Ali Shah S/O Muhammad Tahir Khan	General
60	60	Saddam Hussain S/O Saif Jahan	General
61	61	Abd Khan S/O Khan Muhammad Khan	General
62	62	Adnan Ahmad S/O Huzefa Muhammad Khan	General
63	63	Sana Ullah Khan S/O Muhammad Ayub Khan	General
64	64	Zuraid Ahmad S/O Farid Haid	General
65	65	Fazal Ahmad Tariq S/O Abdul Samad	General
66	66	Fazal Ahmad S/O Muhammad Mustafa	General
67	67	Abdul Raheem S/O Muhammad Raheem	General
68	68	Muhammad Akbar Khan S/O Ghulam Rehman	General
69	69	Sultan Ullah S/O Muhammad Saif	General
70	70	Rafiqul Khan S/O Abdul Hamid Khan	General
71	71	Muhammad Hanif S/O Ghulam Ali	General
72	72	Asad Ullah S/O Bahar Ali Shah	General
73	73	Khalid Ullah S/O Qamarul Zaman	General
74	74	Abdul Azeem S/O Asif Haid	General
75	75	Syed Haidar ud Deen S/O Syed Haidar u Rasheed	General
76	76	Muhammad Imtiaz S/O Sultan Muhammad	General
77	77	Muhammad Imtiaz S/O Muhammad Juma Khan	General
78	78	Hassan Khan S/O Sultan Muhammad	General
79	79	Muhammad Farooq S/O Farid Khan	General
80	80	Muhammad Farooq S/O Haid Khan	General
81	81	Asif Ullah S/O Muhammad Zafar	General
82	82	Amir Ullah Khan S/O Haid Ullah Khan	General
83	83	Shah Saad S/O Farooq Khan	General
84	84	Muhammad Usman Khan S/O Ghulam Rehman	General
85	85	Adnan Rehman S/O Ghulam Rehman	General
86	86	Laqat Ali Khan S/O Ghulam Ali Khan	General
87	87	Syed Farooq Ali Shah S/O Ullah Ali Shah	General
88	88	Dilshad Ali S/O Ullah Ali	General
89	89	Haid Khan S/O Muhammad Zafar Khan	General
90	90	Bahar Rasheed S/O Rasheed Saad	General
91	91	Muhammad Usman Khan S/O Farid Khan	General
92	92	Muhammad Usman Khan S/O Muhammad Farooq	General
93	93	Muhammad Usman Khan S/O Muhammad Zafar Khan	General
94	94	Muhammad Usman Khan S/O Muhammad Farooq	General
95	95	Muhammad Usman Khan S/O Muhammad Farooq	General
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125	125	Muhammad Usman Khan S/O Muhammad Farooq	General
126	126	Muhammad Usman Khan S/O Muhammad Farooq	General
127	127	Muhammad Usman Khan S/O Muhammad Farooq	General
128	128	Muhammad Usman Khan S/O Muhammad Farooq	General

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125	130	Saad Amir Hussain S/O Amir Hussain Khan	Manshera	General
126	131	Muhammad Saif ud Din S/O Muhammad Iqbal ud Din	Chenab	General
127	132	Fazli Amin S/O Momin Khan	Peshawar	General
128	133	Bilal Iqbal S/O Muhammad Zaman	Konistan	General
129	134	Hameed Al-Khan S/O Muhammad Pervez Khan Awan	Manshera	General
130	135	Shujaat Hussain Qureshi S/O Nazar Hussain Qureshi	Manshera	General
131	136	Sherriyar S/O Marjan Ali	Chenab	General
132	137	Abdul Waris S/O Abdul Rasheed	Lahore Marwat	General
133	138	Muhammad Ijaz S/O Muzaffar Hussain	Swat	General
134	140	Shah Saad Khan S/O Hamid Gul	Charsadda	General
135	142	Syed Samsamul Islam S/O Syed Samsamul Islam S/O	Manshera	General
136	143	Sana ul Rahman S/O Hanif ur Rahman	Lower Dir	General
137	144	Yasir Saad Khan S/O Khan Zamar	Lower Marwat	General
138	145	Nasir Khan S/O Abdul Malik	Nowshera	General
139	146	Fahad Zaman Khan S/O Fida Muhammad	Swat	General
140	150	Imam Ullah S/O Aamir Ullah	Lower Dir	General
141	151	Imam Ullah Khan S/O Aman Ullah Khan	Lahore Marwat	General
142	152	Qasim Zaman S/O Faza Zamar	Nowshera	General
143	153	Hajeeb Ullah Khar S/O Naim ul Ullah Khan	D.I Khan	General
144	155	Abid Ullah S/O Hamid Ullah	D.I Khan	General
145	156	Anees ur Rehman S/O Muhammad Younas Khan	Lahore Marwat	General
146	157	Naveed Ahmad S/O Kharsia Muhammad	Buner	General
147	158	Nawaz Zada S/O Saad Khan	Upper Dir	General
148	159	Muhammad Saddam Riaz S/O Muhammad Riaz	Peshawar	General
149	160	Muhammad Nasir S/O Habib ur Rehman	Charsadda	General
150	161	Rizwan Ullah S/O Mukhtar Muhammad	Peshawar	General
151	162	Muhammad Aliat Alam S/O Faisal Sher Khar	D.I Khan	General
152	165	Nazir Muhammad S/O Muhammad Gul	Peshawar	General
153	168	Khizer Fareed S/O Muhammad Fareed	Kohat	General
154	169	Muhammad Tahir S/O Adam Khan	Lahore Marwat	General
155	171	Saddam Hussain S/O Syed Chan Shah	Hangu	General
156	173	Tariq Ullah S/O Shafiq Khan	Peshawar	General
157	174	Muhammad Bilal S/O Faze Suthan	Peshawar	General
158	176	Salim Lateel S/O Lateel Khan	Peshawar	General
159	177	Sam Ullah Khan S/O Hafiz Abdul Latif Khan	Fatak	General
160	180	Muhammad Iqbal S/O Muzaffar Hussain	Swat	General
161	183	Asghar Ali Khar S/O Liaqat Ali	Peshawar	General
162	184	Fazlan Salari S/O Abdul Salari	Karachi	General
163	185	Muhammad Ishaq S/O Muhammad Rafiq	Peshawar	General
164	187	Shah Zaid Ali S/O Habib Khar	Buner	General
165	188	Syed Zohab Ejaz S/O Ejaz Hussain Shah	Hangu	General
166	189	Bilal Inayat S/O Inayat Ullah	Upper Dir	General
167	191	Ozair Khan S/O Zair ul Ateeen	Peshawar	General
168	192	Syed Yousof ul Hassan Munawar S/O Syed Ishaq Hussain	Hangu	General
169	195	Salman Tahir S/O Tahir Taseer	Swat	General
170	197	Gauhar Rehman S/O Bahramand Khan	Buner	General
171	198	Syed Ali Imran S/O Syed Imran Shah	Peshawar	General
172	199	Kilayat Ullah S/O Haseeb Ullah	Peshawar	General
173	205	Yash Iqbal S/O Muhammad Iqbal	Peshawar	General
174	208	Akbar Syed S/O Man Saif Ambar	Swat	General
175	210	Ejaz ul Haq S/O Irfan ud Din	Upper Dir	General
176	211	Abdul Latif Khan S/O Adil Khan	Swat	General
177	217	Alao Ahmad S/O Muhammad Ameer	Nowshera	General
178	220	Zaheer Zaheer S/O Zaheer Ullah Khan	Karachi	General
179	230	Hazrat Atiqar S/O Rahim Ullah	Konistan	General
180	232	Rafia Bibi S/O Ghulam Khar	Hangu	Female
181	236	Israr Ahmad S/O Abdul Rehman	Konistan	General
182	238	Muhammad Zada S/O Hazrat Khan	Upper Dir	General
183	241	Muhammad Ahmad Ali S/O Dost Muhammad	Buner	General
184	242	Rizwan Ullah S/O Muhammad Iqbal	Lower Dir	General
185	243	Syed Kamal Ullah S/O Mar Syed Qasim Jan	Swat	General

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POLICE DEPARTMENT

BANNU REGION

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 appointment	Allotted Range Number	Place of Posting
1.	Ali Kamran 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	6/8	District Bannu
4.	Muhammad Alam Khan S/o Ghulam Rahman	13.02.2017	8/8	District Bannu
5.	Muhammad Momin Khan S/o Muhammad riaz Khan	13.02.2017	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 shah S/o Azad Ali shah	13.02.2017	19/8	District Bannu
9.	Muhammad Bakhtiar Shah S/o Azad Ali Shah	13.02.2017	20/8	District Lakki
10.	Anwarullah Khan S/o Inayatullah 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 Younas Khan	13.02.2017	30/8	District Lakki
15.	Muhammad Taimur S/o Adam Khan	13.02.2017	31/8	District Lakki
16.	Dil Baz Khan S/o Jahan Sardar	13.02.2017	36/8	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.

They may be informed accordingly.

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

No. 732-36/EC dated 23.02.2017

Copy to;

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.
3. The SSP/ Investigation Bannu and Lakki for information.

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

Attested

(MUKHAMMAD ALI KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu
H. No. 4/2/11

Arif

- Copy to:-
1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar for information w/r to CPD Peshawar Memo: No. B91-97/E-III, dated 13.02.2017.
 2. The District Police Officers, Bannu and Lakki for information and i/a.
 3. The SSP/Investigation, Bannu and Lakki for information.

No. 732-36/EC, dated 23/02/2017

(MUKHAMMAD ALI KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu

For n/a and
Ensure Compliance
EC

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. They may be informed accordingly.

S.No	Name & Father name	Date of appointment	Range number	Place of posting
1	Alli Khan s/o Abdul Haq	13.02.2017	2/B	District Bannu
2	Nasuman Khan s/o Shah Miraz Khan	13.02.2017	5/B	District Bannu
3	Habibullah Khan s/o Muhammad Ali Shah	13.02.2017	6/B	District Bannu
4	Muhammad Alam Khan s/o Gulam Raza Khan	13.02.2017	8/B	District Bannu
5	Muhammad Momin Khan s/o Muhammad Riaz Khan	13.02.2017	14/B	District Bannu
6	Wajid-ur-Rahman s/o Zehid-ur-Rahman	13.02.2017	15/B	District Bannu
7	Asim s/o Habibullah Khan	13.02.2017	17/B	District Bannu
8	Muhammad Baitullah s/o Azad Ali Shah	13.02.2017	19/B	District Bannu
9	Muhammad Balal s/o Abdul Khaman	13.02.2017	20/B	District Ladda
10	Armanullah Khan s/o Inayatullah Khan	13.02.2017	22/B	District Ladda
11	Abdul Wahed s/o Abdul Rashid	13.02.2017	25/B	District Ladda
12	Waqar Sajjad s/o Riaz Zaman	13.02.2017	27/B	District Ladda
13	Hassanullah Khan s/o Armanullah Khan	13.02.2017	29/B	District Ladda
14	Anees-ur-Rahman s/o Muhammad Younus Khan	13.02.2017	30/B	District Ladda
15	Muhammad Farooq s/o Adam Khan	13.02.2017	31/B	District Ladda
16	Dr. Baz Khan s/o Jahan Sarder	13.02.2017	36/B	District Bannu

On approval by the Public Service Commission, Khyber Pakhtunkhwa vide letter No. KPK PSC-EXAM-2016/002330, dated 01.02.2017, received from CPD Peshawar vide Memo: No. B91-97/E-III, dated 13.02.2017, the following 16 candidates (15 in 25% quota and 01 in 1% quota) are hereby appointed as Probationary Assistant Sub Inspectors (from the dates, allotted range numbers and posted to the districts as noted against their names).

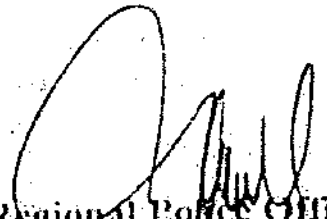
ORDER
POLICE DEPARTMENT
FAR NO. C
13
23 Feb. 2018 11:01
BANNU REGION

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.

1. PASI Inam Ullah No.52/B
2. PASI Anees-ur-Rehman No.89/B
3. PASI Bakhtiar Khan No.103/B
4. PASI Waseem Sajjad No.56/B
5. PASI Anwar Ullah No.22/B
6. PASI Abdul Waheed No.25/B
7. PASI Taimur Khan No.42/B

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


Regional Police Officer
Bannu Region.

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(1)

Document No. 2342/EC dated 22.05.2023

From: The Regional Police Officer,
Hannu Region, Hannu

To: 1) The District Police Officer, Hannu
2) The District Police Officer, Lakki Marwat

No. 2225-2013C, dated Hannu the // 10/7/2023

Subject: DPC MEETING FOR PROMOTION OF ASIS ON LIST-I TO THE RANK OF SUB INSPECTORS.

Memo:

It is intimated that DPC meeting for promotion of confirmed ASIs of Hannu Region on list-I 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:-

S.#	Name, Rank & No.	Place of posting
1.	ASI Munawar Khan No.09/B	CTD, N.W (Undergone Upper College Course at PTC Hangu)
2.	ASI Abdur Rashid No.70/B	Operation Staff Bannu
3.	ASI Farid Ullah No.92/B	Operation Staff Hannu
4.	ASI Asmat Ullah No.50/B	Investigation Staff Lakki
5.	ASI Muhammad Ajmal No.41/B	Investigation Staff Lakki
6.	ASI Muhammad Tahir No.57/B	Investigation Staff Bannu
7.	ASI Ghulam Razaq No.51/B	Operation Staff Lakki
8.	ASI Saif ur Rehman No.64/B	Operation Staff Lakki
9.	ASI Pasham Khan No.53/B	Operation Staff Bannu
10.	ASI Nawab Khan No.85/B	Operation Staff Lakki
11.	ASI Karim Khan No.07/B	Operation Staff Lakki
12.	ASI Mir Tajum No.111/B	Operation Staff Bannu (Undergone Upper College Course at PTC Hangu)
13.	ASI Muhammad Shah No.14/B	Operation Staff Lakki
14.	ASI Almar Khan No.80/B	CTD Bannu
15.	ASI Muhammad Yasaf No.82/B	Operation Staff Lakki
16.	ASI Abdul Jalil No.83/B	Operation Staff Bannu
17.	ASI Abdul Qayyum No.81/B	CTD Bannu
18.	ASI Shafced Ullah No.04/B	CTD Bannu
19.	ASI Imtiaz Khan No.25/B	PTC Hangu
20.	ASI Sher Ali No.102/B	CTD Bannu
21.	ASI Sami Ullah No.123/B	Investigation Staff Lakki
22.	ASI Abdul Hamced No.28/B	CTD, N.W (Undergone Upper College Course at PTC Hangu)
23.	ASI Dilabaz Khan No.36/B	Elite Force, Bannu
24.	ASI Nauman Khan No.71/B	CTD Bannu
25.	ASI Nasib Ullah Shah No.44/B	Operation Staff Bannu (Undergone Upper College Course at PTC Hangu)
26.	ASI Muhammad Bakhtiar No.103/B	CCF Peshawar
27.	ASI Wajid Ali Khan No.43/B	PTC Hangu
28.	ASI Muhammad Alum Khan No.55/B	Operation Staff Bannu (Undergone Upper College Course at PTC Hangu)
29.	ASI Anwar Ullah Khan No.22/B	Operation Staff Lakki
30.	ASI Wajid-ur-Rehman No.65/B	Operation Staff Bannu
31.	ASI Asim No.76/B	Operation Staff Bannu

Atty

16

2.	ASI Muhammad Basit Shah No.100/13
3.	ASI Abdul Wahced No.25/13
14.	ASI Wasim Sajjad No.56/13
15.	ASI Inam Ullah Khan No.52/13
36.	ASI Ancees-ur-Rahman No.89/13
37.	ASI Muhammad Taimur No.42/13

Operation Staff Bannu
Operation Staff Lakki
Operation Staff Lakki
Operation Staff Lakki
Operation Staff Lakki
Operation Staff Lakki

Regional Police Officer
Bannu Region,
Bannu

No. 2227-35 EC, dated Bannu the

10/7/2023

11/07/23

Copies to:-

1. The Commandant, PTC Hangu.
2. The Capital City Police Officer, Peshawar.
3. The District Police Officers, Bannu & Lakki Marwat.
4. The SsP/Investigation, Bannu & Lakki Marwat.
5. The SsP/CTD, Bannu & North Waziristan.
6. The SP/Elite Force, Bannu.

The above mentioned police officers of your respective Districts/Units, either on loan or on deputation to other Districts/Units may be directed to attend the said meeting on due date and time please.

Regional Police Officer
Bannu Region,
Bannu

11/07/23


Attended

Banna Distt. College
promotion

On approval of the Departmental Promotion Committee in its meeting held on **E**
13.07.2023 in the office of the undersigned, the following confirmed ASIs of Banna Region on List "I"
are hereby promoted to the rank of Officiating Sub Inspectors under Police Rules, 13.1, 13.4 (2), 13.12
(1) & 19.25(A).

S.#	Name, Rank & No.	District/Unit
1.	ASI Abdur Rashid No.70/B	Operation Staff Banna
2.	ASI Muhammad Tahir No.57/B	Investigation Staff Banna
3.	ASI Ghulam Razaq No.51/B	Operation Staff Lakki-Marwat
4.	ASI Saif ur-Rehman No.64/B	Operation Staff Lakki Marwat
5.	ASI Pushum Khan No.53/B	Operation Staff Lakki Marwat
6.	ASI Nawab Khan No.85/B	Operation Staff Lakki Marwat
7.	ASI Abdul Qayyum No.81/B	CTD Banna
8.	ASI Sher Ali No.102/B	CTD Banna
9.	ASI Dilshaz Khan No.36/B	B.F, Khyber Pakhtunkhwa
10.	ASI Nauman Khan No.71/B	CTD Banna
11.	ASI Nasib Ullah Shah No.44/B	Operation Staff Banna
12.	ASI Wajid Ali Khan No.43/B	Police School of Traffic & Telecommunication, Kohat
13.	ASI Muhammad Alam Khan No.55/B	Operation Staff Banna
14.	ASI Wajid-ur-Rehman No.65/B	Operation Staff Banna
15.	ASI Asim No 76/B	Operation Staff Banna

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


Regional Police Officer
Banna Region,
Banna

No. 2283-88 /C, dated Banna the 14 /07/2023

Copies for information to:-

To,

G 18

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 SUB-
INSPECTORS 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. 145 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. 14 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. 02.
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. 36 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.

Awais

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7. 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 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

Anees

Anees-ur-Rehman No. 89/8

Assistant Sub-Inspector
Lakki Marwat.

Dated 24-04-2024

Anees


BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Misc. A. No. /2024

IN

S. A. No. /2024

Anees-ur-Rehman

versus

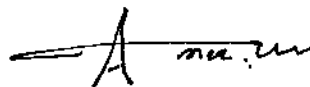
RPO & Another

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

Respectfully Sheweth,

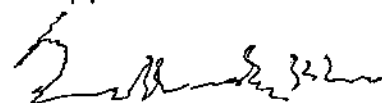
1. That applicant filed the subject appeal before this hon'ble Tribunal today for promotion to the rank of Officiating Sub-Inspector but no date is yet fixed.
2. That respondents are going to make promotion to the rank of Officiating Sub-Inspectors as per letter dated 19-07-2024, while the same subject 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)
3. That if such promotion is made out then once again appellant be compelled for litigation.

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



Applicant

Through



Saadullah Khan Marwat
Advocate

Date: 23-07-2024

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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Misc. A. No. /2024

IN

S. A. No. /2024

Anees-ur-Rehman

versus

RPO & Another

AFFIDAVIT

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



Anees-ur-Rehman

DEPONENT

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From: The Regional Police Officer,
Bannu Region, Bannu

To: 1) The Commandant, PTC Hangu
2) The Deputy Inspector General of Police,
CTD, Khyber Pakhtunkhwa Peshawar
3) The Regional Police Officer
D.I. Khan Region, D.I. Khan
4) The Regional Police Officer,
Mardan Region Mardan
5) The Deputy Commandant,
Elite Force, Khyber Pakhtunkhwa Peshawar
6) The District Police Officers, Bannu & Lakki Marwat
7) The SsP/Investigation, Bannu & Lakki Marwat
8) The SsP/CTD, Bannu Region & North Waziristan

No: 2845-55 /EC, dated Bannu, the 19 / 07 / 2024

Subject: DPC FOR PROMOTION OF ASI_s ON LIST "E" AS OFFG: SI_s


Memo: A DPC meeting for promotion of the following ASI_s of Bannu Region on list "E" as Offg: SI_s, 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 Munawar Khan No. 09/B	CTD/NW
2.	ASI Mutabar Khan No. 112/B	Inv: Lakki Marwat
3.	ASI Abdul Ghani No. 143/B	Ops: Bannu
4.	ASI Syed Nawaz No. 17/B	Inv: Bannu
5.	ASI Abdul Majeed No. 147/B	Ops Bannu
6.	ASI Nemer Khan No. 148/B	CTD KP
7.	ASI Akhto Jan No. 38/B	Ops: Lakki Marwat
8.	ASI Hamza Ali No. 39/B	Ops: Bannu
9.	ASI Rehmat Ullah No. 05/B	PTC Hangu
10.	ASI Firdous Khan No. 263/B	EF KP
11.	ASI Nambiaz Khan No. 264/B	Ops: Bannu
12.	ASI Ijaz Ahmad No. 265/B	Ops: Bannu
13.	ASI Muhammad Farooq NO. 299/B	Ops: Lakki Marwat
14.	ASI Rafi 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 Mudassar Hayat No. 272/B	Ops: Lakki Marwat
19.	ASI Navid Ullah No. 273/B	Ops: Bannu
20.	ASI Asif Khan No. 274/B	Ops: Lakki Marwat
21.	ASI Inam Ullah No. 275/B	Ops: Bannu
22.	ASI Inam Ullah Khan No. 276/B	Ops: Bannu
23.	ASI Jayid Khan No. 277/B	Ops: Bannu
24.	ASI Waheed Ullah No. 278/B	Ops: Lakki Marwat
25.	ASI Abdul Rauf No. 279/B	Ops: Bannu
26.	ASI Irfan Ullah No. 280/B	Ops: Bannu
27.	ASI Irfan 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 Asmat Ullah No. 284/B	Ops: Bannu

31.	ASI Asif Iqbal No. 285/B	Ops: Lakki Marwat
32.	ASI Sifat Ullah No. 286/B	Ops: Bannu
33.	ASI Hazrat Usman No. 287/B	Ops: Lakki Marwat
34.	ASI Sajid Khan No. 288/B	Ops: Lakki Marwat
35.	ASI Javed Rasool No. 289/B	Ops: Lakki Marwat
36.	ASI Wajid Khan No. 290/B	Ops: Bannu
37.	ASI Murshid Khan No. 291/B	Ops: Lakki Marwat
38.	ASI Anwar Kamal No. 292/B	Ops: Bannu
39.	ASI Muhammad Kashif Khan No. 293/B	Ops: Bannu
40.	ASI Misbah UD Din No. 294/B	Ops: Bannu
41.	ASI Ali Nawaz No. 295/B	Ops: Bannu
42.	ASI Shafiq Ullah No. 298/B	Ops: Lakki
43.	ASI Zahid Ullah No. 296/B	Ops: Bannu
44.	ASI Javed Khan No. 06/B	Ops: Bannu
45.	ASI Abid Ullah No. 01/B	Ops: Bannu
46.	ASI Muhammad Bakhtiar No. 103/B	Ops: Lakki Marwat
47.	ASI Anwar Ullah No. 22/B	Ops: Lakki Marwat
48.	ASI Abdul Wahced No. 25/B	Ops: Lakki Marwat
49.	ASI Wasim Sajjad No. 56/B	Inv: Bannu
50.	ASI Inam Ullah Khan No. 52/B	Ops: Lakki Marwat
51.	ASI Anees-Ur-Rehman No. 89/B	Ops: Lakki Marwat
52.	ASI Muhammad Taimur No. 42/B	D.I. Khan Region
53.	ASI Fati Ullah No. 300/B	Ops: Lakki Marwat
54.	ASI Haroon Khan No. 297/B	Ops: Bannu
55.	ASI Wasi Ullah No. 301/B	Ops: Lakki Marwat
56.	ASI Zaman Shah No. 68/B	Ops: Lakki Marwat
57.	ASI Najeeb Ullah No. 145/B	Ops: Bannu
58.	ASI Muhammad Rehman No. 69/B	CTD KP
59.	ASI Haq Nayaz No. 73/B	Ops: Lakki Marwat
60.	ASI Azizur Rehman No. 11/B	Ops: Lakki Marwat
61.	Sher Khan No. 75/B	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.

S.#	Name, Rank & No.	Present posting	Marks in mandatory training courses under Police Rules 19.25(A)	Entry		Pending Departmental proceedings
				Good	Bad	
				QPM =	Major	Minor
				PPM =		
				CC-I =		
				CC-II =		
				CC-III =		

Attests


[Signature]
 Regional Police Officer,
 Bannu Region,
 Bannu

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