FORM OF ORDER SHEET

Court of			•	•
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•	. Court o	f
	App	peal No. 1043/2024
\$.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/07/2024	The appeal of Mr. Anwar Ullah resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for
	1 1 1	preliminary hearing before Single Bench at Peshawar on 29.07.2024. Parcha Peshi given to counsel for the appellant.
		By the order of Chairman REGISTRAR

This is an appeal filed by Mr. Anwar Ullah 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 411

/Inst /2024/KPST

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Saadullah Khan Marwat Adv. High Court Peshawar.

Sir,

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Objections.

25/7/24

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

C.	Μ.	No	/	2024
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IN

S.A. No.

/2024

Anwar Ullah -

versus

RPO & Another

APPLICATION FOR HEARING OF THE SUBJECT APPEAL AT PRINCIPAL SEAT:

Respectfully Sheweth,

- 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: Latter racumA CONTENTS YES NO This Appeal has been presented by: Whether Counsel/Appellant/Respondent/Deponent have signed the ž requisite documents? Whether appeal is within time? 3 Whether the enactment under which the appeal is filed mentioned? 4 Whether the enactment under which the appeal is filed is correct? 5 Whether affidavit is appended? 6 Whether affidavit is duly attested by competent Oath Commissioner? 1 7. Whether appeal/annexures are properly paged? Ī Whether certificate regarding filing any earlier appeal on the subject, 9 × furnished? Whether annexures are legible? Whether annexures are attested? 11 1 Whether copies of annexures are readable/clear? 12 Whether copy of appeal is delivered to AG/DAG? 13 Whether Power of Attorney of the Counsel engaged is attested and 14 signed by petitioner/appellant/respondents? Whether numbers of referred cases given are correct? 15 Whether appeal contains cutting/overwriting? × Whether list of books has been provided at the end of the appeal? 17 Whether case relate to this court? 18 **√** Whether requisite number of spare copies attached? 19 Whether complete spare copy is filed in separate file cover? 20 Whether addresses of parties given are complete? 21 Whether index filed? Whether index is correct? 23 Whether Security and Process Fee deposited? On 24 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 Whether copies of comments/reply/rejoinder submitted? On 26 Whether copies of comments/reply/rejoinder provided to opposite 27

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

party? On

Name:	Boadullale use Manuel
Signature:	3 all um
Dated:	

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A. No. 1043 /2024

Anwar Ullah

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RPO & Another

INDEX

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4.	Appointment order dated 23-02-2017	"C"	13
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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. 1043 /2024

Knyber⁽Pakhtukhwa Sacolee Tribunal

Anwar Ullah S/O Inayat Ullah Khan Assistant Sub-Inspector No. 22/B

SHO Police Station Shahbaz Khel,

Lakki Marwat Appell

Dury No. 14365

Versus

1. Regional Police Officer,

Bannu Region Bannu.

2. Provincial Police Officer,

KP, Peshawar. Respondents

⇔<=>⇔<=>⇔<=>⇔

Fib 10 day

ybmitt filed. 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.

⇔<=>⇔<=>⇔

25/7/24.

Respectfully Sheweth;

- 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")
- That after going through the prescribed procedure of selection, the Commission recommended numerous incumbents, the name of appellant was figured at S. No. 82 vide order dated 01-02-2017. (Copy as annex "B")

- 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. 10 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. 05. (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. 29 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

- 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.

- 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.

Appellant

. Through

Saadullah Khan Marwat

Arbab Saiful Kamal

Amiad Nawas

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, Anwar Ullah No. 22/B, Assistant Sub Inspector SHO Police Station Shahbaz Khel, 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

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 341/2"

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).

ATTO

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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	
2.	Charsada	01	14.	Dir Upper	01
3.	Nowshera	01	15.	Dir Lower	01
4.	Mardan	01	16.	Buner	02
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				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 PHYSICAL

STANDARD: For Male: Height: 5 fe

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
Š.	Swat	1
6.	Kohat	1
7.	Bannu	1
8.	D.l.Khan	1

4. THREE HUNDRED & TWENTY FOUR (324) MALE/FEMALE ASSISTANT SUB-INSPECTORS IN POLICE DEPARTMENT AMONGST IN-SERVICE GRADUATE CONSTABLES/ HEAD CONSTABLES. 3 | Page

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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	Ś.#	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	1.0
7.	Manshera	15	19.	Hangu	1.0
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.

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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		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.

ATT

GENERAL CONDITIONS

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 postal transit. Applications if posted on the last date must reach the Commission's office by the closing hours.

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.

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 NATIONALBANK OF PAKISTAN.

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

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









Subject:

INTER-SE-MERIT POSITIONS OF RECOMMENDEES FOR THE POST OF ASSISTANT SUB-INSPECTORS (BPS-11) IN POLICE DEPARTMENT (ADV1.NO.)4/2014)

S No.	Order Order	Name with Father's Name	District	Ouota
1	1	Astral At S/O Muhammad Khan	Shaneta	Cereial
2	2	Farcog Al S/O Chaman Khan	Mardan	Gereral
3	3	Shahis Alam S/O Reor Rahman	Mardan	Cerésal
4	14	Tansed Khar S/O Wazir Baoshah	Lower Da	Ceresal
5	5	Syed Ali Abbas S/O Syed Shah Hussam Shah	Peshave	Cereral
ó	ò	Afan Ahmad S/O Yousaf	Peshawar	Gereral
7.	7	Noor Muhammad S/O Sikandar Khan	Kohstan	
8	8	Arbati Tal Haide: S/O Arbab Hayat Ullat	Peshana:	Ceneral
Q	9	Ansar Ahmad S/O Izhar Ahmad	Mardan	Ceresal Ceresal
10	10	Ah Kamran S/O Aboul Rauf	Banne	
11.	111	Aalis Hawab O/O Hawat Ali Khan	Perhane	Geréral Female
12.	12	In ayal Ullah Khan S/O Aurangzeb	Shancia	
13	13	Sali Ulah S/O Hussain Khan	tioastora	Ceresal
14	14	Hauman Khar, S/O Shah N az Khan	Earns	Geresal
15	15	Muhammad Yaseen All S/O Sher Muhammad		Ceresal
10.	1¢	Muhamman Faisal S/O Muni Akhtar	Cusivadda	Gercrat
17	17	Asad Ullah S/O (bada) Jan	Roastera	Cerual
18	18	Amal Hayar S/O Sancbar Khan	Upper Dir	Cereial
19,	19	Yash Arafat S/O Said karim	Peshavar	Gerest
70	X -		Mardan	Ceneral
20 21.	21	Arlar Alam S/O About Nasir Khar	Chital	Gereral
??	22	Asil Khan S/O Faseeh ud din	Peshawa:	Cereial
23 .		Arras Ullan Khan S/O Alam Khan	Swat	Gereral
	22	Tuseef or Rehman S/O Sait or rehman	Abtollated	Ceresal
24.	24	Syed Mujatra S/O Shah Jehan	Euner	Gereral
25.	2 <u>r</u>	Safetyada Imran S/O Muhammad Zada	Lower Dr	Gereral
20.	2¢	Fateem Atmad S/O Hasil Khan	Laner Dir	Gereral
21	27	Navi Farlo SrO Fand Ullah Shat	Karak	General
28.	2E	Adri Aruyat S/O Aruyat tiliah	Upre Di	Cereal
70	25	Muhammad Akil Anjum S/O Muhammad Ibrar Anjum	Penhanai	Gercial
30	3C	Syed Fahad S/O Syed Javed Hussain Shah	Abbollatiad .	Cereial
31.	31	Faheem Shah S/O Ajmai Shah	Pensage	Cereral
37.	32	Ahsan Khan S/O Muhammad Arshad	Arboliabac	Gereral
33	32	histac Utlab S/O Amin Utlah	Eurei	
34.	34	About Aziz S/O About Ghan	Peshawar	<u> </u>
35	31.	Syed Mehar All Shah S/O Muhammad All Shah	Di Lower	Cereal
36,	3£	Nascob Ullah Shar S/O Mchammad Ali Shah	Bannu	Ceresal
37.	37	Ahsan lishad 5/0 lishad Khan	Abbollatiad	Gertral
33	38	Haliz ud din Khalak SID Salah ud din Khalak		Gereral
39.	36	Fazal Hadi S/O Wanzar Khan	ligastera .	Ceresa
40.	4C	Dished Pari D/O Syed Aziz Wali Shat:	Kehsun	Cereal
41	45	non sing land the See Act Wall Smar.	Chiral	f en ale
12.	42	Mai d Khan S/O Arif Khan	Charsadda	Cereral
13	12	Favan Yousat Sito Miser Yousat	Abbottatiad	Ceresal
(4,	44		Mardan	Ceneral
15.	45	Ansan Shakou S/O About Shakou:	Attoliatiac	Cerual
16,	4t	Muhammad Bakhtiar S/O Abdul Kranan	Laket Marwel	Ceresa
17 <u>.</u>	46	Muhammad Imran S/O Ghuram Yascen	D1Khan	Central
	 	Wald All Khan S/O Zard All Khan	Earne	Cereal
18	4E	Muhammad Khuhab Walee S/O Fazal ur Rahman Baloch	Dit Kitan	Cercial
φ.	45	Jawad Khan S/O Barrawar Sald	Lower Dr.	Cereial
0	50	Rowan Ullan Khan S/O Hassulat Khan	Upper Da	General
1.	51	Amir Riaz S/O R az Ali Shah	Mardan	Cereral
2	37	Mudassar Iphal S/O Ratini Gul	Peshanzo	Geresal
53.	52	Muhammad Shah Zoeshan igtal SiQ Gulam Rathani Khan	D.I.Khan	Gereial
4	54	triekhat: A'am S/O Muhammad Wam	Pennana	Gereial
5.	55	Wagar All S/O Rashle All	Swat	Gereral
۰Ö.	56	Sail Ullah S/O Noor Faraz Khan	Lower Dir	Gereial
:7.	57	Muhammad Asim S/O Sam: ut Haq	Mantan	
8,	58	Faican Ashraf S/O Mchemman Ashraf	I wamb.	General

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59	5¢	Ocean Ali Shart S/O Muhammad Yousaf	Chita	General
60.	6C	Saddam Hussain S/O Shat Jahan	DJ Khan	General
61	61	Agrib Khan S/O Khan Muhammad	Peshawai	Gereral
63	52	Adnan Ahmad S/O Niaz Muhamman Khan	Nonai	General
64.	5?	Sana Ullah Khan S/O Mchammad Ayut Khan	D I IQuan	Gerent
65	9 7	Zuharb Austrad S/O Falak Naz	Upce: Do	Cereal
66	5t	Favan Ahmad Tang S/O Adbus Samad	Mardan	General
67	67	Asha: Mushlag S/O Muhammad Mushlad Adeel Ralique: S/O Muhammad Rafigue	Warsetra	General
68.	65	Muhammad Alam Khan S/O Ghulam Rehman	Mansetra	Cereal
69.	55	Sustain Ulan S/O Muhammad Said	Barnu	Cereal
70	7C	Rafful ah Khan SrO Abdul Manan Khan	Lated Matival	General
71	71	Munammad Hamid Al S/O Ghafar Al.	Charsacda	Central
72.	72	Asad Ullah S/O Barkal A'l Shor	Peshawai	Gereial Gereial
73	72	Khalique Zaman S/O Cameruz Zaman	Buner	General
74	71	Arait: Aamir S/O Aamir Hat It:	Marselta	Gereial
75	75	Syed Haseer ud Deer S/O Syed Haroon ur Rasheed	Buner	Cereal
76	76	Malik Muhammad Shoalo S/O Suhan Muhammad	Attonatae i	Gereral
77	77	Wuhammad Imliaz S/O Muhammad Junia Khan	Chra	Cereial
78	76	Nasr Khan SA) Sulan Muhammad	LOASE DE	Gereral
79.	75	Waqa: Ahmad S/O Izzat Khan	Karak	Gereral
80	50	Muhammad Faroog S/O Hatir Urlah	Buner	Cerelat
£1.	81	As I Mudaser S/O Muhammac Zubah	LOWER DA	Cereral
83	82	Anwar Utah Khan S/U Inayat Ulah Khan	Lakti Marwat	General
84.	84	Shah Saud S/O Maxcod Khan	Peshawa:	Cereal
65	St.	Noor Satilh Ullan S/O Hamid Li Rehman Adnan Rehman S/O Gul Rehman	Ch rat	Ceresal
86	50	Lau Al Khan S/O Cuhai Ali Khan	Charsacda	Cereral
57	57	Syed Magsoca Ali Shah S/O Zufibai Ali Shah	Wardan	Cereral
88			Manseria	Cereal
69.	9E 9C	Dilawar Ali S/O Lizgat Ati	Abcollated	Cereal
90	91	Rasii Khan S/O Mchammad Zahii Khan Ealbii Rashad S/O Room Shad	Lewer Da	Cereial
91	92	Merajud din S/O Faza' Karim Khan	Bunei	Cereial
92	94	Ami Manzoor S/O Muhammad Manzoor	Chain	Gererat
93.	94	Muhammad Usman Khan S/O Muhammad Zarif Khar	Kohrstan	Cereral
94	96	Muhammad Tayyat S/O Zar Than	Peshana: Honstera	Cereral
95	97	Muhammad Momin Khan S/O Muhammad Rlaz Khan	Banna	Cereal
96	ĢΕ	Walic is Retiman S/O Zahid is Retiman	Barne	General General
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98	100	Muhammad forces SAD Satar Jamil	Karak	Gereral
99	101	Syed Al Raza Shah S/O Swed Asiam Shah	Chital	Ceneral
100	102	Addatsh Malmar S/O Khao m Shah	Peytana	Gereral
101.	IC3	Shehzad Ali Khan S/O Aktai Ali Khan	Peshana	Ceresal
102	104	Arsalan Khan S/O Muhammad Idrees	Swatt	Cerwal
102	105	Adnan Wanced S/O Abdul Wanced	Characoa	Cereal
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109	112	Salman Atimao S/O Mushlag Atimad	LONG DO	Cerual
110	113	Muhammad Subhan Ullah S/O Khan Baost ah	Peshanse	Gereial Gereial
111.	114	Munit Ahmad SiO Hoor Wall Khan	Chita	Gereial
112	115	Abdulah S/O Haji Muhammad	Chta	Geresal
112	116	Zohaib Ali Khan S/O Zai Zarrin Khan	Lone: Dr	Cereral
114	117	Mudasse Bayat S/O Sita; ur Baq	Pevhanzi	General
115.	118	Nast, Dai S/O Muhammad Ayub	Lone Dr	Cereral
11¢	119	Syed Nyas S/O Syed Sdraf Shah	Charaosa Charang	Cereal
117.	171	Muhammad Basil Shah S/O Azad All Shah	Banns.	Certaal
118.	122	Muhsin Ul Hao S/O Abdul Hao	Chta	Cerual
319 120,	123	Shahzad Ali Syed SZO Syed Karon Ali Shan	Chira	Cerisal
121	124	Maid Khan S/O Sanati Gul	Peshanai	Cetesa
122.	126	Shamsu Rahman S/O Haji Mujad Falsai S/O Ali Bahadar Khan	China	Ceresi
127.	127	Munamman Ismail S/O Ancur Rasheed	Buner	Certical
124	128	Aqi Khan 5/0 Nanab Khan	Swats.	Geresal
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175	130	Saac Amir Hussain S/O Amir Hussain Khan	Manyetua	General
176.	131	Muhammad Saif ud Din S/O Muhammad Ikram ud Din	Chital	General :
127	132	Fazil Amin 5/O Mcmin Khan	Peshawai	General
128.	133	Bland lobal S/O Muhammad Zaman	Kchislan	Cencal
129	134	Hamza Al-Khan S/O Muhammad Pervez Khan Awan	Manyerra	General
130	135	Shujahat Hussain Outeshi S/O Hazar Hussain Outeshi	Ceneral .	
131	136	Shernyar S/U Marian Al	Mansetra Unarsadda	Ceneral
132.	137	Abdul Waheed S/O Abdul Rasheed	Laiti Marout	
133.	138	Muhammad Laz S/O Muzaffar Hussain	Swal	General
134.	140	Shar Saud Khan S/O Hamish Gul	Charsadda	Cere al
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136.	143	Sana ur Rahman S/O Hanf ur Rahman	Lone Di	Cerea!
137	144	Wasim Sayad Khan S/O Khan Zamar		Ceneral
138	145	Hascer Khan S/O Alide Malit	Latio Markat flowsteral	General
139.	146	Far ad Zaman Khan S/O Fida Muhammed	Swat	General
140	150	Inam Urah S/O Aabid Ulah		Cened
141.	151	inam Utah Khan S/O Aman Utah Khan	Lows Du	Geneal
142	152	Oasim Zaman S/O Fazal Zaman	Laku Marnat	General
143.	153	Najeeb Ullah Khan S/O Naimat Ullah Khan	Heastera	General
144	155	Alad Ullah SAO Hamid Ullah	D.I Khan	General :
145	156	Anees or Retman S/O Muhammad Younas Khan	D+K⁻an	Ceneral
146.	157	Haveed Ahmad S70 Khaisia Muhammad	Lai u Mainai	Congraf
147	15H	Hawat Zada S/O Said Khan	Buner	Ceneral
148.	159	Muhammad Saddam Risz S/U Muhammad Risz	Orres Ou	Central
149	160	Musarman Result No. Hanbur Rehman	Peshanai	Ceneral
150.	161	Rizwan Ulah S/O Mukhtis Muhammad	Charsacda	Central
151	162	Mathamman Africa Alone Control of Control	Peshawa	Cereal
152.	165	Muhammad Allat: Alam S/O Falai Sher Khar Nazir Muhammad S/O Muhammid Gul	DiKhan	Ceneral
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154	169	Khizer Faleed S/O Muhammad Faleed Muhammad Talmer S/O Adam Khan	(Che)	Ú+r⊌al .
155.	171	States the see Store	Latto Marwat	[Georgi
15c.	173	Sadcam Hussen S/O Syed Chan Sheh	Hatiput	Ceneral
157.	174	Tang Utah S/O Shancay Khan	Peshawar	(General)
158.	176	Muhammad Blial S/O Fazie Suthan	Peshanar	Central
159	177	Salman Laked S/O Laked Khan	Peshawai	Genteal
16C.	TEO	Sami Ulah Khari S/O Haji Atdu Lalif Khan	Tank	Contrat
161.	183	Muhammad Lyas S/O Muzaffar Hussain	Swal	Ceneral
162.	124	Asghar Al Khar S/O Liagat Al	Peshawar	Germai
163	185	Faizan Satat S/O ALdul Satat	Karak	General
164	187	Muhammad Ishtaq S/D Muhammad Ralig	Peshawar	Gertrai
165	168	Shahzad Ali S/O Hab b Khan	Buner	Ceneral
166.	129	Syed Zohaib Ejaz S/O E az Hussain Shan	Hatiput	General -
167	191	Bi'al Inayat S/O Inayat Ullah	Upper Dir	Central
162.	197	Özair Khan S/O Zain ul At locen	Peshanai	General
169.		Syed Yousaf ur Hassan Muhariya S/O Syed (krian) Hussan	Haripur	General
170	195	Salman Tahri S/O Tahir Tasteerr	Swat	Ceneral
17u.	167	Gauhar Retiman S/O Bahramand Khan	Bunet	Ceneral (
172	198	Syed At Im an S/D Syed trivan Shah	Peshakar	Ceresi
	199	Kitayal Utlan S/O Kasi Utlan	Penhanai	General
173. 174	205	Yasir Iqba: S/O Muhammad Iqbal	Peshawar	General
	208	Aktrai Syed S/O Man Sald Amtai	Swal	General
175	210	Ejaz ul haq S/O Irlan ud din	Upper Do	General
176.	211	Abdel Latif Knan S/O Adil Khan	Swal	Ceneral
177	217	Alaq Armad S/O Muhammad Azeem	Nonstica	Gencial
178.	220	Zeeshan Zahoo: S/Q Zahoo: Ullah Khan	Karak	General
179.	230	Hazral Abuzar S/O Rahm Ullah	Kohistan	General
160.	222	Rugla Bibi D/O Ghutam Khan	Hampur	Ferrate
181.	236	Israr Ahmad S/O Abdul Rehman	Kchistan	General
182.	23B	Muhammad Zada S/O Hazrat Khar	Upper Dir	General :
183.	241	Muhammad Ahmad Ali SIO Dost Muhammad	Buner	General .
164	242	Rizwan Ulat: S/O Muhammac Islan	LCAS DI	Gercal
185.	243	Syed Khamai Ullah S/O Mar Syed Oas milan	Swal	Ceneal .
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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;

CH .	N- 0 Chi			
S#	Name & father name	Date of		Place of Posting
<u></u>		appointment	Number	1
1.	AliKamran S/o Abdul Rauf	13.02.2017	2/8	District Bannu
2.		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.	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.	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 \$ardar	13.02.2017	36/8	District Bannu
NT	Andrew Competer - 4.6			

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.

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

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POLICE DEPARTMENT

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numbers and posted to the districts as noted against their names. appointed as Probationer Assistant Sub inspectors from the dates, allorted range following to candidates (15 in 25% quota and 01 in 19% quota) are hereby received from CPD Peshawar vide Memo: No.891-97/E-III, dated 13.02.2017, the Politicultive vice letter no.109K PSC-Exam-2016/0023330, dated 01.02.2017 On approval by the Public Service Commission, routber

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urana8.15listerG	0/9	13.62.20.11	munital malud old narth mala bammenuli	ļ
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District Bank	1/5!	1105.50.61	Walld-W-Rehman 3/0 Lehid-ta-Rehman	- 6 -
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Panna Region, Bannu Regional Police Officer, (אחורואאאאלם אבו אמנאנו) פנף

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11 212 E Bewill Region, Bunnu Regionsi Police Oifficer, (MUHANNAD ALI KHAN) PSP

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Wit to CPO Perhan at Memot No.891-9778-83-60 15.02.201.2017 1. The Provincial Police Officer, idipler Pablitunibus Peshawar for information

3. The StP/Investigation, Barra and Libbi for information. The District Police Officers, Bannu and Lablu for information and ma.

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16.

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.c.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.

- L. PASI Inam Ullah No.52/B
- PASLAnces-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

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The Regional Police Officer. Barro Region, Hanns

The District Police Officer, Harmu The District Police Officer, Lakki Marvest

No. 2225-241C, dated Harmu the // /07/2023

Subject:

DEC MEETING FOR PROMOTION OF ASIS ON LIST-BOTH PRANK DE SUB-INSPECTORS.

Memo:

it is intimated that DPC meeting for promotion of confirmed ASIs of Bannu 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;

S.	Name, Rank & No.	Place of posting
1.	ASI Munuvur Khun No.09/13	CTD, N.W (Undergone Upper College Course at PTC Hangu)
2.	ASI Abdur Rashid No.70/II	Operation Staff Bannu
3.	ASI Farid Ullalı No.92/II	Operation Staff Hunnu
4.	ASI Asmat Ullah No.50/II	Investigation Staff Lakki
5	ASI Muhummad Ajmal No.41/II	Investigation Staff Lakki
6.	ASI Muhammad Tahir No.57/0	Investigation Staff Bannu
7.	ASI Ghulam Razuq No.51/II	Operation Staff Lakki
<u>B.</u>	ASI Saif ur Rehman No.64/D	Operation Staff Lakki
9.	ASI Pasham Khan No.53/II	Operation Stoff Bannu
10.	ASI Nawab Khan No.85/II	Operation Staff Lakki
11.	ASI Karim Khan No.07/B	Operation Stuff Lacki
12.	ASI Mir Tajum No.111/II	Operation Staff Bilanu (Undergone Upper
12.	1	College Course at PTC Hangu)
13.	ASI Muhammad Shah No.14/B	Operation Staff Lakki
14.	ASI Almar Khan No.80/IJ	CTD Bunnu
15.	ASI Muhammad Yosaf No.82/B	Operation Staff Lakki
16.	ASI Abdul Jalil No.83/B	Operation Staff Hannu
17.	ASI Abdul Qayyum No.81/II	CID Bannu
18,	ASI Shafeed Ullah No.04/B	CTD Bannu
19.	ASI Imtiaz Khan No.25/I3	PTC Hangu
20.	ASI Sher Ali No.102/B	CTD Bannu
21.	ASI Sami Ullalı No.123/II	Investigation Staff Lukki
<u> </u>	7(3) 3mill Oliga 1 (1) 120 (1)	CTD. N.W (Undergone Upper College Cour
22.	ASI Abdul Hameed No.28/I3	ut PTC Hangu)
	10100 L KI 200	
23.	ASI Dilabaz Khan No.36/II	Elite Force, Bannu
24.	ASI Nauman Khan No.71/B	CID Bunnu
25.	ASI Nasib Ullah Shah No.44/II	Operation Stuff Bannu (Undergone Upper
. · · · · · · · · · · · · · · · · · · ·		College Course at ITC Hangu)
	ASI Muhammad Bakhtiar No.103/ii	CCI ² Poshaver
7.	ASI Wajid Ali Khan No.43/B	PTC Hangu
		Operation Staff Bannu (Undergone Upper
8. 7	ASI Muhammad Alam Khan No.55/I3	College Course at PTC Hangu)
9. /	ASI Anwar Ullah Khan No.22/I3	Operation Stuff Lakki
		· · · · · · · · · · · · · · · · · · ·
	SI Wajid-sr-Rehman No.65/B	Operation Stuff Bannu
1. [/	NSI Asim No.76/B	Operation Stuff Bannu

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	ASI Muhammad Basit Shah No. 100/B
181 14.	ASI Wasim Saliad No sen
- 15.	I ASI Inam Ullah Khan Nijira
3 <u>6.</u>	1 ASI Ances-ur-Rahmun XI in
37.	ASI Muhammad Taimur No.42/B
	

Operation Stuff Bannu Operation Staff Lakki Operation Staff Lakki Operation Staff Lakki Operation Staff Lakki Operation Stuff Lukki

> Regional Police Officer Bannu Region, Bannu

/07/2023

No. 2227-35 EC, dated Bannu the Copies to;-

The Commandant, PTC Hangu.

- The Capital City Police Officer, Peshawar.
- The District Police Officers, Bannu & Lakki Marwut.
- The SsP/Investigation, Bannu & Lakki Marwat. 4.
- The SsP/CTD, Bannu & North Waziristan.
- The SP/Elite Force, Bannu.

The above mentioned police officers oſ 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,

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 Banna Region on List "E" are hereby promoted to the rank of Officinting Sub Inspectors under Police Rules, 13.1, 13.4 (2), 13.12 (1) & 19.25(A).-

S.#	Name, Runk & No.	District/Unit
1.	ASI Abdur Rushid No.70/B	Operation Staff Banan
2.	ASI Muhammad Tahir No.57/II	Investigation Staff Danna
3.	ASI Ghulum Razuq No.51/B	Operation Staff Lukki Marvat
4.	-ASI-Saif ur Rehman No.64/B	Operation Staff Lakki Marvet
5.	ASI Pushum Khun No.53/B	Operation Staff Lakki Maryat
6.	ASI-Nawab Khan No.85/I3	Operation-Staff-Lakki Marwat
7 .	ASI Abdul Quyyum No.81/B	CTD Banno
<u>8</u> .	ASI Sher Ali No.102/13	C'ED-Bannu
9.	ASI Dilabaz Khan No 36/B	B.F. Kliyber Pakhtunkhwa
io.	ASI Nauman Khan No.71/B	CTD Bannu
11.	ASI Nasib Ullah Shah No.44/B	Operation Staff Banna
12.	ASI Wajid Ali Khun No.43/B	Police School of Traffic & Telecommunication, Kolmt
13.	ASI Muhammad Alam Khan No.55/B	Operation Staff Dannu
14.	ASI Wajid-ur-Relunan No:65/13	Operation Staff Burnin
15.	ASI Asim No 76/B	Operation Staff Bormu

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

Regiment Police Officer Banna Region,

No. Z 2 83 - 88 /EC, dated Bannushe / 9 /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 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. 82 vide order dated 01-02-2017.
- 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. 10 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. 05.
- 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. 29 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 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 numbly 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

Anwar Ullah No. 22/B

A mirral

Assistant Sub-Inspector Lakki Marwat.

Dated 24-04-2024

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BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Misc. A. No.

/2024

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S. A. No.

/2024

Anwar Ullah

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.
- 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

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Misc. A. No.

/2024

IN

S. A. No.

/2024

Anwar Ullah

versus

RPO & Another

AFFIDAVIT

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

DEPONENT

The Regional Police Officer, From: Bannu Region, Bannu

The Commandant, PTC Hangu To:

The Deputy Inspector General of Police, 2) CTD, Khyber Pakhtunkhwa Peshawar

The Regional Police Officer 3) D.I. Khan Region, D.I. Khan

The Regional Police Officer,

Mardow Region Marca

5) The Deputy Commandant,

Elite Force, Khyber Pakhtunkhwa Peshawar

The District Police Officers, Bannu & Lukki Marwat 6)

The SsP/Investigation, Bannu & Lakki Marwat 7)

The SsP/CTD, Bannu Region & North Waziristan 8)

9 /07/2024 /EC, dated Bannu, the

Subject:

DPC FOR PROMOTION OF

Memo:

A DPC meeting for promotion of the following ASIs of Bannu Region on list "E" as Offg: 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:

-citte		war.	k		
5.#	Name, Flank & No.	4.	steinin-		Present Posting
1	ASI Munawar Khan No. (**************************************		CTD/NW
2.	ASI Mutabar Khan No.1 i		11111	\$	Inv: Lakki Marwat 🐖
3.	ASI Abdul Ghani No. 143	8/B ¥			Ops: Bannu
4.0.	ASI Syed Nawaz No. 17/	8		.i. 🌞	Iny: Валли
5.	ASI Abdul Majeed No. 14	17/B 🌋	**	*	Ops Bannu
б.	ASI Nemer Khan No.148	/B	*****		· CTD KP
7.	ASI Akhto Jan No. 38/B	· kı		=======================================	^I Ops: Lakki Marwat
8.	ASI Hamza Ali No. 39/B		*****	-5	, Ops: Bannu 🐞
9.	ASI Rehmat Ullah No. 05	/B	W.	W.	PTC Hangu
10.	ASI Firdous Khan No. 26	3/B	dt-		5F KP
1),	ASI Nambiaz Khan No. 2	64/B			Ops: Bannu
12.0	ASI Ijaz Ahmad No. 265/	В	**.		Ops: Bannu
13.	ASI Muhammad Farooq N	NO. 299/E	3 z′ [:]	\ \ \	Ops: Lakki Marwat
14.	ASI Rafi Ullah No. 268/B		2.		Ops: Bannu
15.*	ASI Shakeel Khan No. 26	9/B	4		Ops: Lakki Marwat 🐃
16.	ASI Insha Ullah No. 270/I	3	*		Ops: Lakki Marwat
17.	ASI Murad Ali Khan No.	271/B			Ops: Lakki Marwat
18.0	ASI Mudassar Hayat No.	272/B			Ops: Lakki Marwat 🌨
19.	ASI Navid Ullah No. 273/	В	-	_	Ops: Bannu
20.	ASI Asif Khan No. 274/B				Ops: Lakki Marwat 🕮
21.	ASI Inum Ullah No. 275/I	}	· · · · · · · · · · · · · · · · · · ·		Ops: Bannu
22.	ASI Inam Ullah Khan No.	276/L			Ops: Bannu
23,	ASI Javid Khan No. 277/1			-	Ops: Bannu
24.	ASI Waheed Ullah No. 27	8/B			Ops: Lakki Marwat
25.	ASI Abdul Rauf No. 279/		· · · · · · ·		Ops: Bannu
26.	ASI Irfan Ullah No. 280/I				Ops: Bannu
27.	ASI Irfan Ullah No. 281/I	3	Same	403	Ops: Lakki Marwat 🖑
28.	ASI Adil Zaman No. 282/		·		Osar Dansu
29.	ASI Aurungzeb No. 283/B		15.	-	
30.	ASI Asmat Ullah No. 284	/B	- 126	*	Ops. Dannu =
:			**		Ops: Bannu

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' :		Ops: Lakki Marwat
	ASI Asif Iqbal No. 285/B	Ops: Bannu
31.	ASI Sign Hillah No. 280/D	Ops: Lakki Marwat
33.	ASI Hazrat Usman No. 28 //B	Ops: Lakki Marwat
34.	ASI Salid Khan No. 288/B	Ops: Lakki Marwat
35.	ASI Javed Raspol No. 289/B	Ops: Bannu
36.	ASI Waiid Khan No. 290/B	
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 Shafqat Ullan No. 298/B	Ops: Lakki
43.	ASI Zahid Ullah No. 296/B	Ops: Bannu
44.	ASI Javed Khari No. 06/B	Оря: Ваппи
45.	ASI Abid Ullah No. 01/B	Ops: Bannu
46.	ASI Muhammad Bakhtiar No. 103/B	Ops: Lakki Marwat
47.	ASI Anwer Ullah No. 22/B	Ops: Lakki Marwat
48.	ASI Abdul Waheed 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 Ances-Ur-Rehman No. 89/B	Ops: Lakki Marwat
52.	ASI Muhammad Taimur No. 42/B	D.I. Khan Region
53.		Ops: Lakki Marwat
54.	ASI Haroon Khan No. 297/B	Ops: Bannu
55.		Ops: Lakki Marwat
56.	ASI Zaman Shah No. 68/B	Ops: Lakki Marwat
57.	ASI Najesb Ullah No. 145/B	Ops: Bannu
58.	ASI Muhammad Rehman No. 69/B	CTD KP
59.	ASI Haq Nawaz No. 73/B	Ops: Lakki Marwat
60.	ASI Aziz ur Rehman No. 11/B	Ops; Lakki Marwat
61.	Sher Khan No. 75/I3	Mardan Region
9 ,,		

It is therefore requested that their service records and information on the below proforms 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,	Present	Marks in mandatory	E	ntry		Pendia	ıg
	Rank posting & No.		training courses under Police Rules 19.25(A)	Good	В	ad	Departmental proceedings	
######################################		á		QPM = PPM = CC-I = CC-II = CC-III =	Major	Minor	***	***************************************
L:	•				,			1

Regional Police Officer Bannu Region, Bannu

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