


Form-A

FORM OF ORDER SHEET

Court of _____

Execution petition No. 918/2024

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge.
1	2	3
1	21/8/2024	<p>The instant Execution petition presented today by Syed Nauman Ali Bukhari Advocate, may be entered in the relevant register and put up to the Court for proper order please. This restoration application is entrusted to S. Bench at Peshawar to be put up there on 10/9/2024.</p> <p style="text-align: right;"> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

EXECUTION PETITION No. 918 /2024

IN

SERVICE APPEAL NO. 1146/2019

Fazl-e-Amin

VS

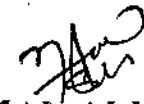
Police Deptt & etc.

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1.	Memo of Execution Petition	-----	01-03
2.	Copy of Judgment dt: 21.01.2021	- A-	04-06
3.	Copy of order dt: 30.06.2021	--B--	07
4.	Copy of order dt: 03.10.2022	--C--	08-09
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PETITIONER

THROUGH:


(SYED NOMAN ALI BUKHARI)

Advocate, High Court
Peshawar.

Room No.FR-08, 4th Floor,
Bilour Plaza Peshawar Cantt:
Cell # 03065109438

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

EXECUTION PETITION No. 918 /2024

IN

SERVICE APPEAL NO. 1146/2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15099

Dated 21/8/24

Fazl-e-Amin, Ex-Assistant Grade Clerk,
Special Branch, Khyber Pakhtunkhwa, Peshawar.

(APPELLANT)

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Inspector General of Police, Special Branch Khyber Pakhtunkhwa, Peshawar.
3. The SSP/Admin Special Branch, Khyber Pakhtunkhwa, Peshawar.

(RESPONDENTS)

**EXECUTION PETITION FOR DIRECTING THE
RESPONDENTS TO IMPLEMENT THE
JUDGMENT DATED 21.01.2021 OF THIS
HONORABLE TRIBUNAL IN LETTER AND
SPIRIT.**

RESPECTFULLY SHEWETH:

1. That the petitioner filed service appeal No. 1146/2019 in this august Tribunal against the order dated 15.01.2019.
2. That the said appeal was finally heard by the Honorable Tribunal on 21.01.2021 and the Honorable Tribunal was kind enough to accept the appeal of the appellant as prayed for. (Copy of judgment is attached as Annexure-A).
3. That the appellant also filed application to respondents for the implementation of judgment. The respondents were totally failed in taking any action regarded the Honorable Tribunal Judgment dated 21.01.2021.

4. That the petitioner Execution Petition No. 72/2021 for implementation of Judgment during the pendency of Execution Petition the respondent brought the order dated 30.06.2021 whereby the petitioner was reinstated with immediate effect, on the basis of said order the execution petition was consigned to the record room. **Copy of order dated 30.06.2021 is attached as Annex-B.**
5. That thereafter the petitioner filed restoration application for restoration of execution petition on the ground that the judgment of Honorable Service Tribunal was not properly implemented. The Execution Petition was restored by the Honorable Tribunal vide order dated 03.10.2022. **Copy of the order dated 03.10.2022 is attached as Annex-C.**
6. That during pendency of Execution the respondent brought the order dated 21.10.2022 wherein the petitioner was restored to the original position with all back benefits. On the basis of said order the execution petition was consigned to the record room. **Copy of order dated 21.10.2022 is attached as Annex-D.**
7. That now the department issue the seniority list of Office Assistant on 20.07.2024 wherein the petitioner was kept at the bottom of seniority list despite that the petitioner was restored to his original position with all back benefits. Which is clear violation of the Judgment of Honorable Tribunal even its own order dated 21.10.2022. **Copy of the seniority list is attached as Annex-E**
8. That the judgment is still in the field and has not been suspended or set aside by the Supreme Court of Pakistan, therefore, the respondents are legally bound to grant proper seniority position i.e at Sr.No. 01 of the seniority list.
9. That the petitioner filed application to the competent authority for correction of seniority in light of the judgment dated 21.01.2021 and order dated 21.10.2022, in the above mentioned appeal but in vain. **Copy of application is attached as Annex-F**
10. That the petitioner has having no other remedy to file this Execution Petition.

It is, therefore, most humbly prayed that the respondents may be directed to obey the judgment dated 21.01.2021 of this august Tribunal in letter and spirit and the respondent may further be directed to correct the seniority list dated 20.07.2024 and place the appellant at Sr. No. 01 being senior most Assistant. Any other remedy, which this august Tribunal deems fit and appropriate that, may also be awarded in favor of applicant/petitioner.

PETITIONER

Fazl-e-Amin
Fazl-e-Amin

THROUGH:

Noman Ali Bukhari
(SYED NOMAN ALI BUKHARI)

Advocate, High Court
Peshawar.

AFFIDAVIT:

It is affirmed and declared that the content of the execution petition is true and correct to the best of my knowledge and belief and nothing has been concealed from the Honorable Tribunal.

Fazl-e-Amin
DETONENT



ACU FIA

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Amended Service Appeal No. 1146/2019

Date of Institution ... 16.09.2019

Date of Decision ... 21.01.2021



Fazal-e-Amin, Ex-Assistant Grade Clerk, Special Branch, Khyber Pakhtunkhwa, Peshawar. ... (Appellant)

VERSUS

The Provincial Police Officer, Government of Khyber Pakhtunkhwa, Peshawar and two others. ... (Respondents)

Present:

SYED NOMAN ALI BUKHARI,
Advocate

--- For Appellant.

MR. MUHAMMAD RIAZ KHAN PAINDAKHEL,
Assistant Advocate General

--- For respondents.

MR. HAMID FAROOQ DURRANI,
MR. MIAN MUHAMMAD

--- CHAIRMAN
--- MEMBER (Executive)

JUDGEMENT.

HAMID FAROOQ DURRANI, CHAIRMAN:- Syed Noman Ali Bukhari,

Advocate submitted Wakalatnama in his favour executed by the appellant. Made part of the record.

02. The appellant is aggrieved from order dated 15.01.2019 issued by the respondent No.2/ Deputy Inspector General of Police, Special Branch, Khyber Pakhtunkhwa Peshawar. His departmental appeal, preferred before the respondent No.1 was not responded to.

~~ATTESTED~~

ATTESTED
[Signature]
AGENCY
Khyber Pakhtunkhwa
Services Tribunal
Peshawar

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03. We have heard the learned counsel for the appellant, learned Assistant Advocate General on behalf of the respondents and have also gone through the available record.

04. At the outset, learned counsel for the appellant referred to the impugned order dated 15.01.2019 and stated that the Deputy Inspector General of Police, Special Branch, Peshawar/ respondent No.2 was not a competent officer, for the purpose of discipline, in the cases of ministerial staff of police. Referring to Section-44 of the Khyber Pakhtunkhwa Police Act, 2017 it was contended that only the Provincial Police Officer was the competent authority to pass such orders. The impugned order was, therefore, void and could not sustain.

Learned Assistant Advocate General opposed the argument of learned counsel for the appellant and contended that by virtue of notification dated 28.12.2015, the Regional Police Officer was delegated the powers of disciplinary action against ministerial staff. In his view, the appellant was rightly proceeded against and awarded major penalty of compulsorily retirement by the Deputy Inspector General of Police, Special Branch.

05. It is a matter of record that the appellant was issued charge sheet for misconduct detailed therein on 18.10.2018. The exercise was under taken by SSP/Admin Special Branch, Khyber Pakhtunkhwa, Peshawar while on the other hand, the impugned order dated 15.01.2019 was passed by the DIG, Special Branch.

Reading Section-44 of Khyber Pakhtunkhwa Police Act, 2017 in juxtaposition to the statement of allegations as well as the impugned order, it becomes clear that neither the competent authority/ Provincial Police officer, issued the charge sheet nor the impugned order was passed by him. It shall be useful to reproduce hereunder the relevant part of Statute *ibid*:-

ATTESTED

Ministerial staff etc.—(1) Subject to rules, Provincial Police Officer, may appoint ministerial staff and other employees to assist the Police.

(2) Any person employed under sub-section (1) shall be under the direction and control of Provincial Police Officer.

(3) The powers of direction and control referred to in sub-section(2) shall include the powers of discipline and dismissal.

(4) Subject to rules, Provincial Police Officer, may delegate his powers and authority under this section to an officer of appropriate rank.

In the circumstances of the case and in view of the above noted provision of law, we have no other option but to hold that the impugned order was *corum-non-judice* for all intents and purposes. Having been issued by an incompetent official/officer it can only be termed as void ab-initio. At the cost of repetition, it is noted that the Provincial Police Officer was the only competent authority for the purpose of case in hand. The respondents could not produce any instrument regarding delegation of powers of PPO, as provided by the law, *ibid* in favour of some other officer. The notification dated 28.12.2015, as relied upon by learned Assistant Advocate General, was undeniably issued in the year 2015, much before the coming into force of Khyber Pakhtunkhwa Police Act, 2017.

06. For what has been noted above, the appeal in hand is allowed as prayed for. The parties shall, however, bear their respective costs. File be consigned to the record room.

ANNOUNCED
21.01.2021

(MIAN MUHAMMAD)
MEMBER(E)

(HAMID FAROOQ DURRANI)
CHAIRMAN

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

ATTESTED

~~Date of Delivery~~ 02-10-23
Date of Copying 02-10-23
Name of Copyist —
Total 20/1
Wages 5/1
Copying 37
Number of Pages —
Date of Presentation 02-10-23

ORDER

B 7
F/B

This order is passed in compliance with the Judgment of the Hon'ble Khyber Pakhtunkhwa Service Tribunal, Peshawar dated 21.01.2021 passed in Service Appeal No. 1146/2019 filed by Fazal-e-Amin Ex-Assistant Grade Clerk (hereinafter referred as accused official) against impugned Order of Compulsory Retirement from Service under the Khyber Pakhtunkhwa (Efficiency & Discipline) Rules 2011 vide Order dated 15.01.2019. Facts in brief leading to the instant departmental action of imposing Major Punishment of Compulsory Retirement from service against the accused official are as follows:-

A fake/bogus letter was sent to NADRA vide letter No. 9105/Security dated 22.05.2018 by this establishment wherein an Afghan Waris Khan s/o Haji Anar Gul was declared illegally as Pakistani National while the verification process was at that time in progress at Field Office AGO City Peshawar. The said dispatch number was deliberately left blank in the dispatch register while the reference of the fake/bogus letter was mentioned in Dak book. The signature of supervisory Officer i.e SP Intelligence was obtained fraudulently on the said fake/bogus letter and the accused official was posted as Record Keeper ASB Section/SB (Now VB-1).

Proper departmental proceedings were initiated under ibid Rules by issuing Charge Sheet and Statement of Allegations against the accused official. Mr. Muhammad Irshad SP/JIT, Special Branch was appointed as Enquiry Officer to probe into the matter. The Enquiry Officer after conduct of detailed enquiry, found the accused official guilty of misconduct within the meaning of ibid Rules. The competent authority after perusal of the enquiry imposed Major Punishment of Compulsory Retirement from Service upon the accused official under ibid Rules vide Order dated 15.01.2019. Where after, the accused official filed Appeal to Worthy Inspector General of Police, Khyber Pakhtunkhwa but was filed by the competent authority on 27.08.2019 being badly time barred. Later on, the accused official filed Service Appeal No. 1146/2019 in Khyber Pakhtunkhwa Service Tribunal which was accordingly allowed/accepted and the impugned Order dated 15.01.2019 was set aside being coram-non-judice and the accused official is reinstated into Service.

Department approached law department for lodging appeal/CPLA wherein the Scrutiny Committee headed by Secretary Law approved the case hence CPLA against the impugned Judgment/ Order has been filed by this establishment in the August Supreme Court of Pakistan.

In the meanwhile, accused official filed Execution Petition No. 72/2021 in Service Appeal No. 1146 of 2019 before the Khyber Pakhtunkhwa Service Tribunal, Peshawar for implementation of the judgement. Case was fixed for hearing on 10.06.2021 wherein the Hon'ble Tribunal was pressing hard and directed for implementation of the Judgment with the following remarks passed:-

"If the CPLA has been filed and the judgment has not been suspended, then the respondents are under obligation to implement the judgment, subject to decision of CPLA by the August Supreme Court of Pakistan. Respondent are, therefore directed to issue an Order towards implementation of the judgment subject to decision of CPLA by the Apex Court. To come up report in compliance on 08.07.2021 before S.B."

Proper guidance was sought from CPO vide letter No. 740/Legal/SB dated 18.06.2021 and the competent authority directed to implement the judgment dated 21.01.2021 conditionally and provisionally subject to outcome of CPLA vide letter No. 5707/Legal dated 23.06.2021.

As the Hon'ble Tribunal is pressing hard and directed for implementation of the Judgment and to come up for report in compliance on 08.07.2021 therefore, the judgment has become final and there is no other option but to implement the judgment hence is provisionally implemented and Fazal-e-Amin Ex-Assistant Grade Clerk is re-instated in service with immediate effect. Further the accused official shall submit proper affidavit on stamp paper that he will return the payment made to him if CPLA was accepted.

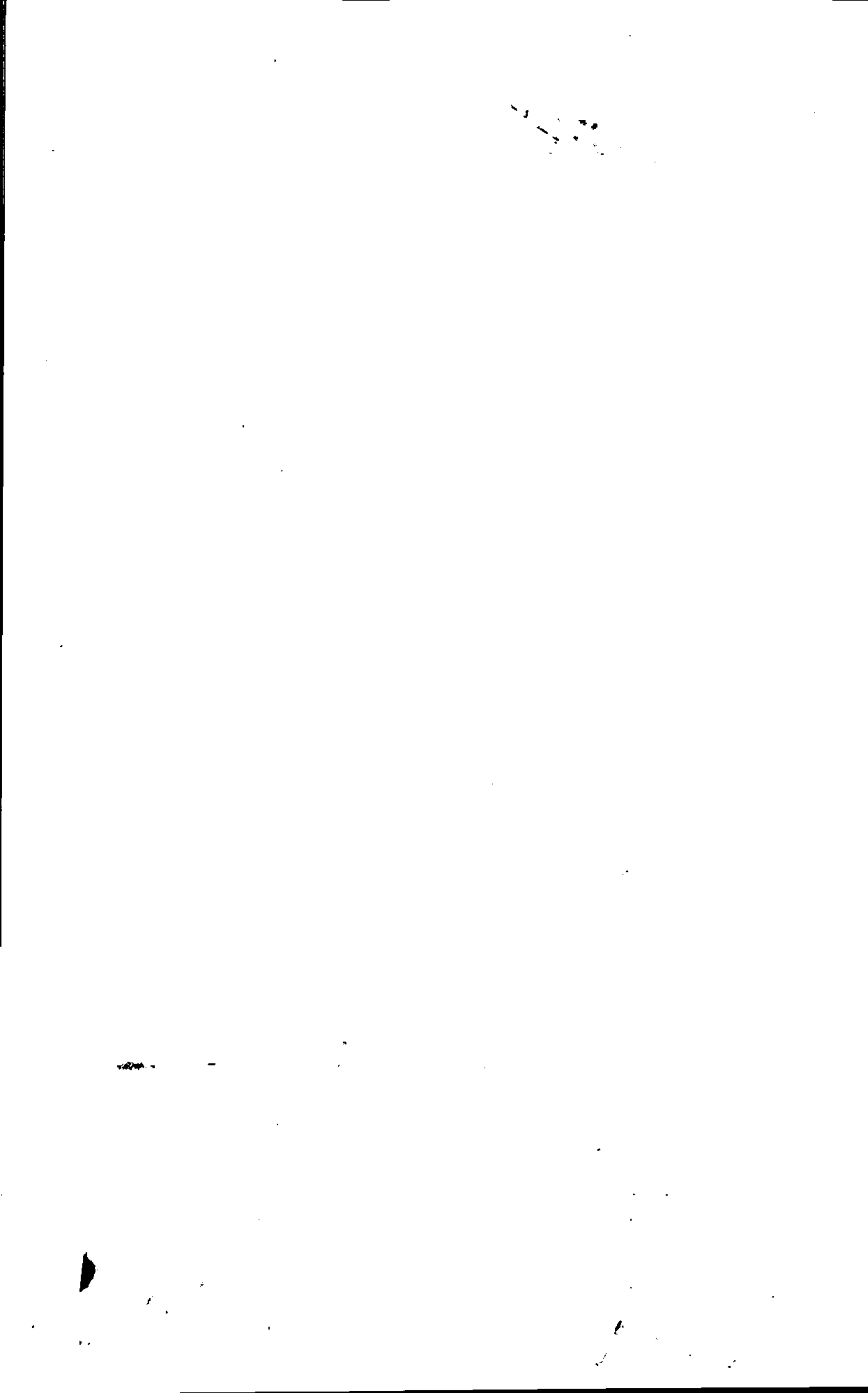
Deputy Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa,
Peshawar.

No. 4847-54/EB

, dated, the Peshawar, 30/06/2021

Copy of this above is forwarded to all concerned.

ATTESTED



BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

②
②⑧
F/C
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Execution Petition No. 77 /2021
In Service Appeal No.1146/2019



Fazl-e-Amin, Ex-Assistant Grade Clerk,
Special Branch, KP Peshawar.

PETITIONER

VERSUS

1. The Provincial Police Officer, Govt of KP Peshawar.
2. The Deputy Inspector general of Police, Special Branch, KP Peshawar.
3. The SSP/ Admin Special Branch, KP Peshawar.

RESPONDENTS

EXECUTION PETITION FOR DIRECTING THE
RESPONDENTS TO IMPLEMENT THE
JUDGMENT DATED: 21.01.2021 OF THIS
HONORABLE TRIBUNAL IN LETTER AND
SPIRIT.

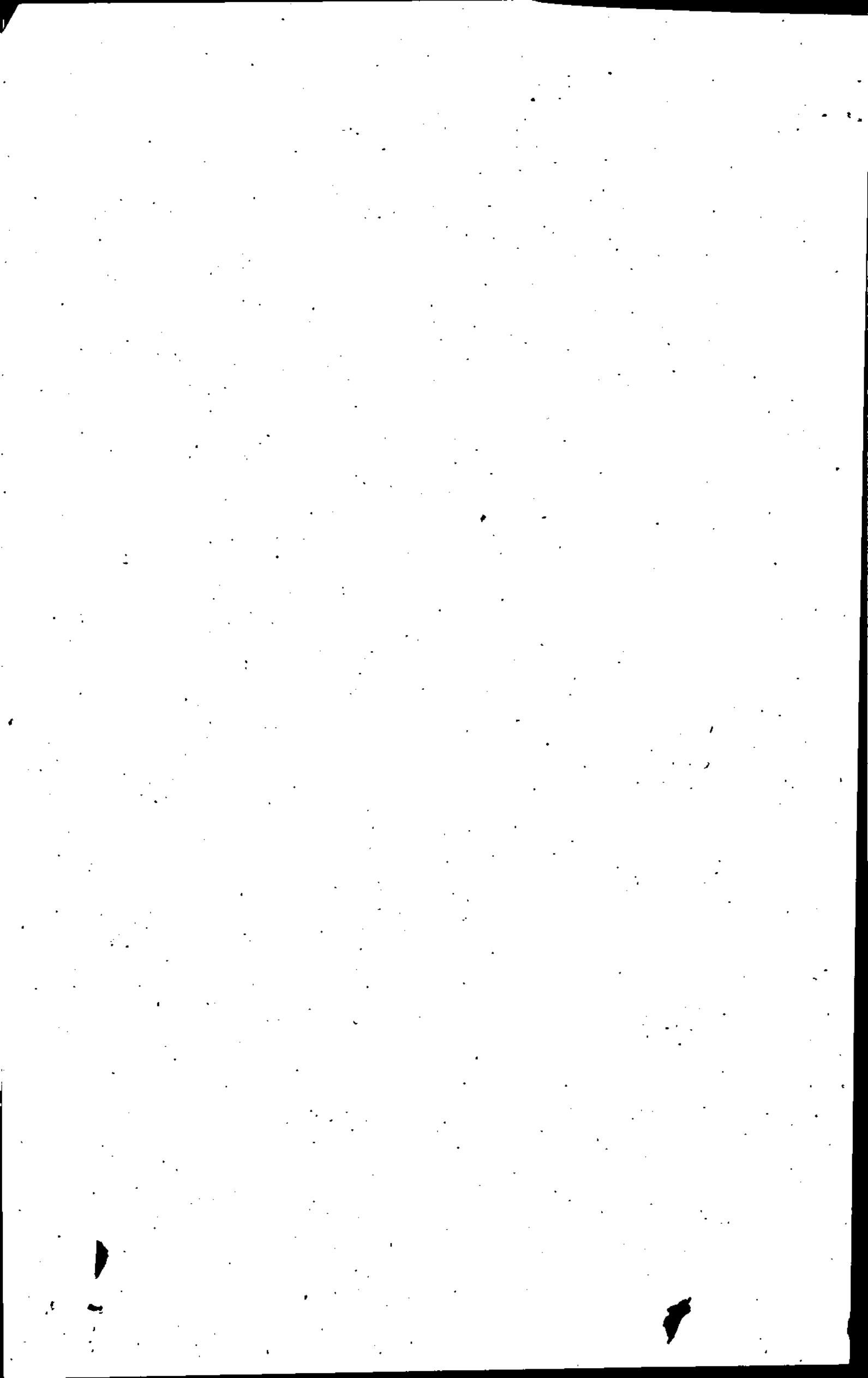
RESPECTFULLY SHEWETH:

1. That the applicant/appellant filed Service Appeal No.1146/2019 in this august Tribunal against the order dated 15.01.2019.
2. That the said appeal was finally heard by the Honorable Tribunal on 21.01.2021 and the Honorable Tribunal was kind enough to accept the appeal of the appellant as prayed for. (Copy of judgment is attached as Annexure-A).
3. That the appellant also filed application to respondents for the implementation of judgment. The respondents were totally failed in taking any action regarded the Hon'able Tribunal Judgment dated 21.01.2021.

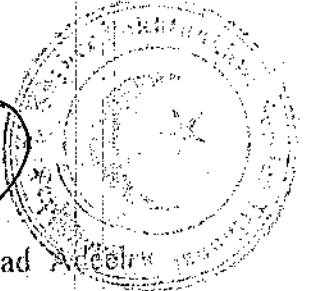
ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

~~ATTESTED~~



E.P. No. 72/2021
Fayl-e-Amin vs Court



03.10.2022 Petitioner alongwith counsel present. Mr. Muhammad Azeem Butt, Addl. AG alongwith Ayaz Khan, S.I (Legal) for the respondents present.

Learned counsel for the appellant stated at the bar and argued the application for restoration of the Execution Petition on the ground that implementation report in the form of order dated 30.06.2021 shows that the petitioner has been reinstated in service with immediate effect. She contended that the petitioner was required to have been reinstated in service w.e.f. 15.01.2019.

Since the implementation report (order dated 30.06.2021) is not in accordance with the judgment of Service Tribunal dated 21.01.2021 (all back benefits as prayed for in Service Appeal No. 1146/2019 have been allowed) therefore, the original execution petition consigned to the record vide order dated 08.07.2021, is restored to its original number. To come up for proper implementation report on 29.11.2022 before S.B.

ATTESTED

Secretary
Service Tribunal
Islamabad

(Mian Muhammad)
Member (E)

~~ATTESTED~~

ORDER

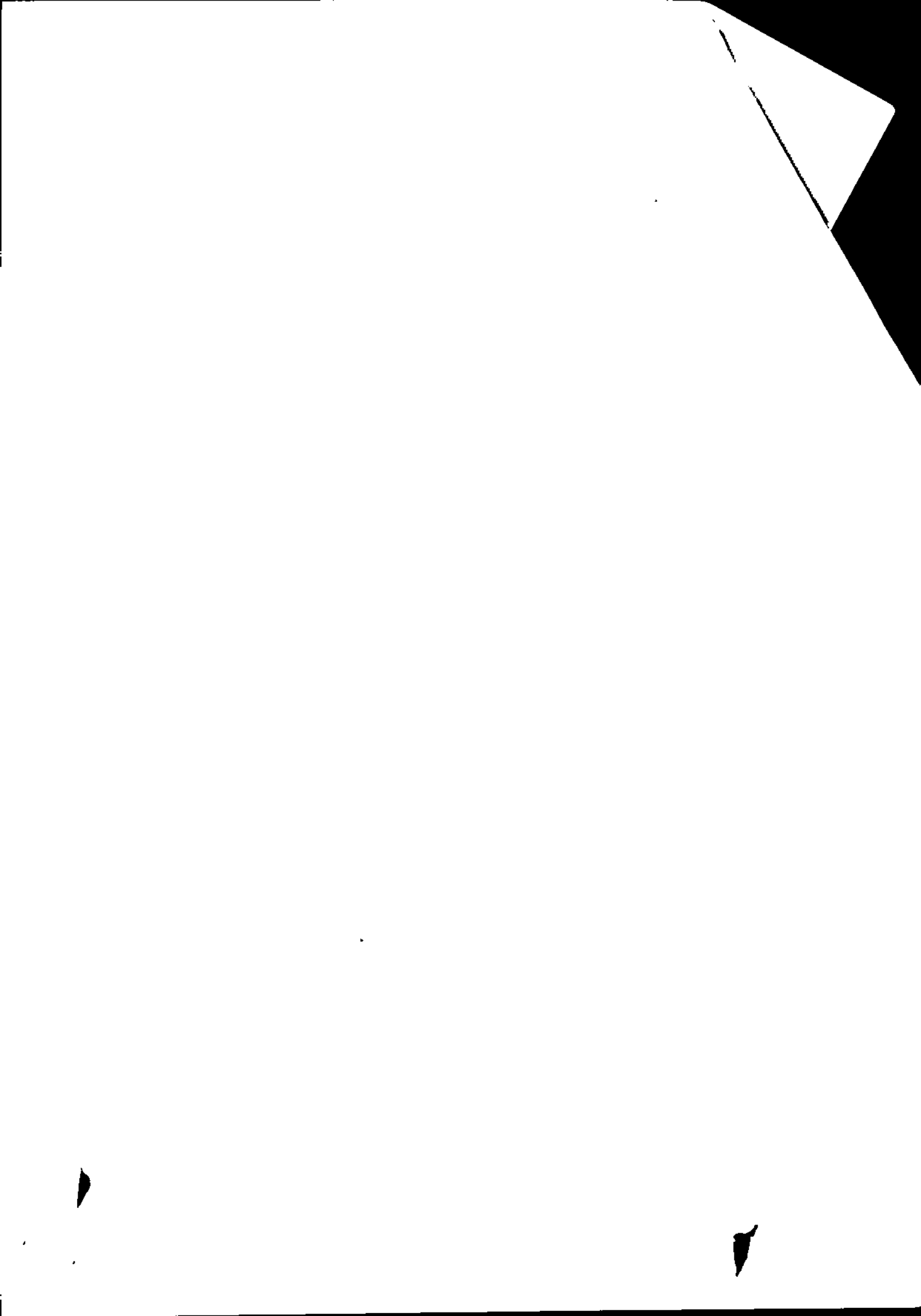
D-10

In continuation of this office order No.4847-54/EB dated 30.06.2021 held in pursuance of the Khyber Pakhtunkhwa Service Tribunal Judgment dated 03.10.2022 issued in CM No. 358/2021 in Execution Petition No. 72/2021 in Service Appeal No.1146/2019 with the approval granted by CPO vide letter No. 5198/Legal dated 17.10.2022 all back benefits of Assistant Grande Clerk Fazal-e-Amin is released conditionally and provisionally subject to outcome of CPLA with immediate effect.

Deputy Inspector General of Police,
Special Branch Khyber Pakhtunkhwa,
Peshawar.

No. 9937-46 /EB dated Peshawar the; 21 / 10 /2022
Copies to all concerned for information and necessary action.

~~ATTESTED~~





OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

SENIORITY LIST OF OFFICE ASSISTANT (BPS-16) AS IT STOOD ON 20.07.2024

No. 3980 /E-V: - The Seniority list of Office Assistant (BPS-16) of Khyber Pakhtunkhwa Police is published for information of all concerned:-

S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
1.	Hamid Khan	21.02.1969	20.02.2029	Kohat	10th	01.10.1987	18.02.2012	
2.	Meher Gul	12.12.1964	11.12.2024	Peshawar	F.A	17.06.1984	18.02.2012	The official has submitted an application, wherein he refused/forego promotion to the next higher scale due to his domestic issues, vide CCP Peshawar Memo: No. 13284/EC-II, dated 28.08.2020. According to Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) Notification No. SOR-VI (E&AD)1-3/2009/Vol-VIII, dated 22.10.2011, he will not be considered for promotion for the next four (04) years.
3.	Muhammad Jamshid	01.04.1965	31.03.2025	Mardan	10th	06.02.1983	06.09.2012	Awarded major punishment of reduction in time scale of pay by 02-stages for a period of 02-years, by SSP/Operation Peshawar vide order No. 2157-63/PA, dated 22.09.2020
4.	Muhammad Naeem	01.04.1968	31.03.2028	Charsadda	10 th	10.12.1986	06.09.2012	Compulsory retired from Service vide order No. 675/EB: dated 15.01.2019. Later on, he was reinstated in service vide order No. 4107-15/E-V, dated 28.08.2019.
5.	Attaullah Khan	05.05.1965	04.05.2025	D.i.Khan	10th	22.02.1987	06.09.2012	The official has submitted an application, wherein he refused/forego promotion to the next higher scale, and not willing for promotion, vide Commandant FRP Khyber

Superintendent EV,

Superintendent CPB,

Superintendent Secret,

Registrar

ADMITTED

S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
								(12) Pakhtunkhwa Memo: No. 7844/EC, dated 04.09.2020. According to Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) Notification No. SOR-VI (E&AD)1-3/2009/Vol-VIII, dated 22.10.2011, he will not be considered for promotion for the next four (04) years.
6.	Muhammad Shoaib	24.08.1966	23.08.2026	Kohat	B.A	13.08.1987	06.09.2012	
7.	Halim Khan	15.02.1966	14.02.2026	Peshawar	10th	08.11.1987	06.09.2012	
8.	Hazrat Hussain	19.04.1968	18.04.2028	Swat	10th	14.02.1988	06.09.2012	
9.	Said Raza	11.11.1966	10.11.2026	D.I.Khan	10 th	01.04.1987	04.02.2015	Assigned revised/inter-se-seniority
10.	Amjid Ali Shah	10.06.1965	09.06.2025	Peshawar	10 th	13.09.1987	04.02.2015	Assigned revised/inter-se-seniority
11.	Ali Man Shah	03.04.1965	02.04.2025	Peshawar	10th	10.02.1988	22.07.2013	
12.	Saleem Akhtar	31.05.1967	30.05.2027	Haripur	10 th	13.02.1988	04.02.2015	Awarded major punishment of Compulsory Retirement by RPO/Hazara vide order No. 228-29/PA, dated 24.01.2017. However, later on, his previous punishment of compulsory retirement was converted into stoppage of one 01-year increment with cumulative effect by RPO/Hazara vide order No. 932-34/PA, dated 26.03.2019.
13.	Muhammad Ishaq	15.02.1969	14.02.2029	D.I.Khan	10th	14.02.1988	22.07.2013	
14.	Kifayat Hussain	15.01.1967	14.01.2027	D.I.Khan	F.S.C	16.02.1988	22.07.2013	
15.	Attiqullah	03.09.1968	02.09.2028	Charsadda	B.A	13.12.1987	04.02.2015	Assigned revised/inter-se-seniority
16.	Muhammad Jehangir Khan	28.09.1966	27.09.2026	Peshawar	10th	07.04.1988	22.07.2013	
17.	Saeed Ahmad	28.02.1966	27.02.2026	Kohat	10th	17.02.1988	22.07.2013	
18.	Shakeel Ahmad	04.01.1968	03.01.2028	Abbottabad	F.A	17.02.1988	22.07.2013	

Superintendent EV,

Superintendent CPB,

Superintendent Secret,

Registrar

TESTED

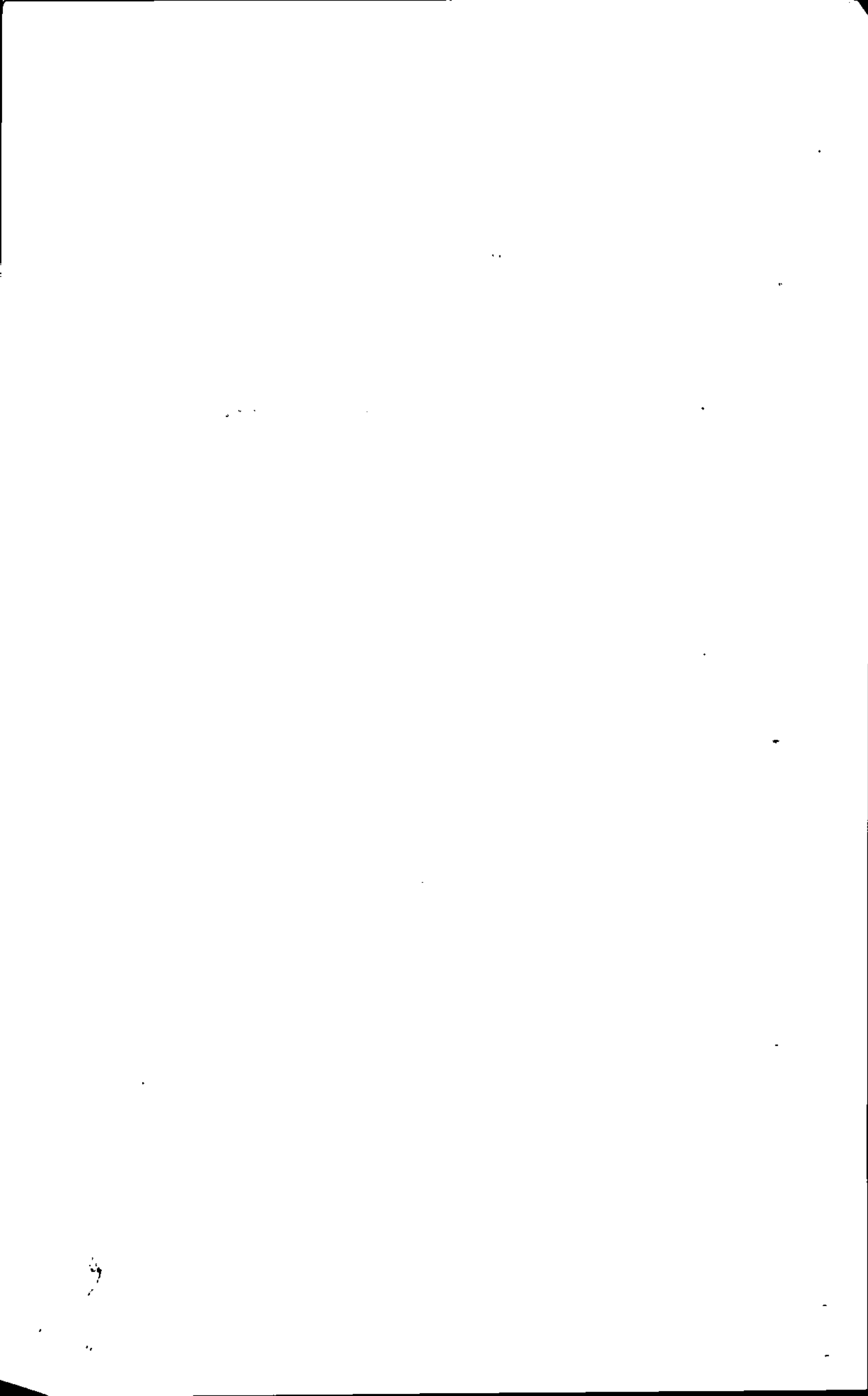
S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
19.	Liaqatullah	20.04.1969	19.04.2029	D.I.Khan	10th	08.06.1988	22.07.2013	
20.	Muhammad Tufail	20.04.1968	19.04.2028	Peshawar	F.A	02.07.1988 JC	22.07.2013	
21.	Muhammad Umar	30.01.1969	29.01.2029	DIKhan	10th	16.02.1988	22.07.2013	
22.	Abdullah Khan	01.04.1970	31.03.2030	Swabi	B.A	21.07.1988	22.07.2013	
23.	Habib Shah	15.10.1968	14.10.2028	Kohat	10th	13.02.1988	22.07.2013	
24.	Amir Rehman	22.04.1965	21.04.2025	Dir	10 th	24.02.1988	04.02.2015	Assigned revised/inter-se-seniority
25.	Jalal-ud-Din	21.02.1966	20.02.2026	Malakand Agency	10 th	24.04.1988	04.02.2015	Assigned revised/inter-se-seniority
26.	Ubaid-ur-Rehman-I	14.09.1964	13.09.2024	Charsadda	F.A	31.03.1988	04.02.2015	Assigned revised/inter-se-seniority
27.	Ghulam Dali	01.03.1966	28.02.2026	Kohat	10th	01.08.1988	22.07.2013	
28.	Muhammad Farooq	01.01.1966	31.12.2025	Peshawar	F.A	08.09.1988	22.07.2013	
29.	Zahid Khan	11.01.1968	10.01.2028	Peshawar	M.A	15.09.1988	22.07.2013	
30.	Ayub Khan	01.01.1966	31.12.2025	Swat	F.A	01.10.1988	22.07.2013	
31.	Sajjad Anwar	12.02.1967	11.02.2027	Kohat	F.A	02.10.1988	31.10.2017	Assigned revised seniority vide Notification No. 2489-94/E-V, dated 06.08.2020.
32.	Muhammad Nasir	11.11.1970	10.11.2030	Kohat	B.A	05.06.2009	17.09.2019	Assigned Revised Seniority vide this office Notification No. 4637-44/E-V, dated 14.12.2020
33.	Muhammad Sher	01.06.1965	31.05.2025	Peshawar	B.A	08.07.1989	22.07.2013	
34.	Zar Badshah	02.11.1964	01.11.2024	Peshawar	10 th	15.02.1987	04.02.2015	
35.	Shamsher Ali Shah	06.08.1968	05.08.2028	Mardan	B.A	15.02.1988	04.02.2015	
36.	Khan Sadiq	07.10.1968	06.10.2028	Charsadda	F.A	27.12.1987	04.02.2015	
37.	Muhammad Pervez	05.02.1966	04.02.2026	Swat	10 th	03.09.1988	04.02.2015	

Superintendent EV,

Superintendent CPB,

Superintendent Secret,

Registrar



S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
38.	Nida Ajmal	23.12.1988	22.12.2048	Peshawar	B.A	10.08.2017	Public Service Commission	
39.	Azra Zeb	07.06.1993	06.06.2053	Swabi	B.S (HONS)	19.08.2017	Public Service Commission	
40.	Hina Gulrukh	18.05.1988	17.05.2048	Peshawar	B.S (HONS)	19.08.2017	Public Service Commission	
41.	Sajidah Sabah	11.09.1993	10.09.2053	Chitral	M.A	19.08.2017	Public Service Commission	
42.	Taj Muhammad	06.09.1969	05.09.2029	Mardan	F.A	17.02.1988	31.10.2017	
43.	Ihsanullah	11.05.1967	10.05.2027	Charsadda	10 th	19.09.1988	31.10.2017	
44.	Javed Ali	06.09.1968	05.09.2028	Charsadda	F.A	19.09.1988	31.10.2017	
45.	Inamullah	12.04.1969	11.04.2029	Bannu	F.A	25.09.1988	31.10.2017	
46.	Muqrab Alam Khan	07.10.1970	06.10.2030	Mardan	10 th	08.10.1988	31.10.2017	
47.	Rauf	14.02.1970	13.02.2030	Lakki	10 th	18.12.1988	31.10.2017	
48.	Tahseen Ullah	10.01.1965	09.01.2025	Charsadda	F.A	03.07.1989	31.10.2017	
49.	Nadeem Ahmad	11.04.1971	10.04.2031	Mansehra	10 th	05.07.1989	31-10.2017	
50.	Waheed-Ur-Rehman	25.12.1968	24.12.2028	Abbottabad	D.Com	10-10-1989	17.09.2019	Assigned Revised Seniority vide this office Notification No. 3104-11/E-V, dated 02.09.2020
51.	Nizakat Khan	20.04.1969	19.04.2029	Haripur	10 th	16.10.1989	31.10.2017	
52.	Naseer Ahmad	04.10.1965	03.10.2025	Peshawar	F.A	07.01.1990	31.10.2017	
53.	Ishtiaq Hussain	20.08.1971	19.08.2031	Charsadda	10 th	10.01.1990	31.10.2017	
54.	Imran Ullah	22.09.1988	21.09.2048	F.R Lakki Marwat	M.B.A	18.01.2019	Public Service commission	

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Superintendent EV,


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Superintendent CPB,


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Superintendent Secret,

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Registrar

S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
55.	Muhammad Asad Khan	17.03.1989	16.03.2049	Peshawar	M.B.A	18.01.2019	Public Service commission	15
56.	Syed Adnan Ahmad Shah Banoori	04.07.1985	03.07.2045	Malakand	MSC	18.01.2019	Public Service commission	
57.	Zia-Ur-Rehman	09.09.1987	08.09.2047	Peshawar	MSC	18.01.2019	Public Service commission	
58.	Arif Khan	03.05.1988	02.05.2048	Bannu	M.Phil	18.01.2019	Public Service commission	
59.	Adnan Khan	17.03.1987	16.03.2047	S.W Agency	MSC	18.01.2019	Public Service commission	
60.	Hajra Rehman	06.05.1993	05.05.2053	Bannu	BSC (HONS)	18.01.2019	Public Service commission	
61.	Noor-Ul-Haq	18.03.1991	17.03.2051	Chitral	M.A	18.01.2019	Public Service commission	
62.	Waqar-Ul-Haq	06.04.1985	05.04.2045	Nowshera	M.A	12.02.2014 JC 18.01.2019 AGC	Public Service commission	
63.	Fida Hussain	30.03.1991	29.03.2051	N.W Agency	M.A	18.01.2019	Public Service commission	
64.	Aamir Fida	12.03.1992	11.03.2052	Charsadda	M.A	18.01.2019	Public Service commission	
65.	Hafeez Ullah Khan	06.02.1988	05.02.2048	Lakki Marwat	D.PHARMACY	18.01.2019	Public Service commission	
66.	Fahad Shafi	15.03.1989	14.03.2049	Peshawar	M.B.A	18.01.2019	Public Service commission	
67.	Saqib Qazi	27.09.1989	26.09.2049	Swat	B.A	18.01.2019	Public Service commission	
68.	Gul Muhammad	02.02.1992	01.02.2052	Bajawar Agency	BSC	18.01.2019	Public Service commission	


Superintendent EV,


Superintendent CPB,


Superintendent Secret,


Registrar

S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
69.	Muhammad Omer Ilyas	01.11.1992	31.10.2052	Abbottabad	MSC	18.01.2019	Public Service Commission	
70.	Arshad Ali	28.06.1992	27.06.2052	Mansehra	B.A	18.01.2019	Public Service Commission	
71.	Saif-Ur-Rehman	12.05.1992	11.05.2052	Mansehra	MBA	18.01.2019	Public Service Commission	
72.	Saba Kausar	05.03.1992	04.03.2052	Mardan	B.S (HONS)	04.02.2019	Public Service Commission	
73.	Hussain Ali	08.06.1968	07.06.2028	Swat	FA	29.04.2008	17.09.2019	
74.	Muhammad Humayun	04.04.1965	03.04.2025	Charsadda	10 th	16.01.2008	17.09.2019	
75.	Muhammad Ramzan	15.03.1969	14.03.2029	D.I Khan	10 th	16.01.2008	17.09.2019	
76.	Shafqat Hayat	29.12.1969	28.12.2029	Kohat	10 th	16.01.2008	17.09.2019	
77.	Muhammad Javed	11.09.1964	10.09.2024	Peshawar	10 th	11.12.2012	17.09.2019	
78.	Amjad	21.04.1965	20.04.2025	Mansehra	FA	05.06.2009	17.09.2019	
79.	Zahid Ullah	04.03.1969	03.03.2029	Peshawar	10 th	08.08.2009	17.09.2019	
80.	Muhammad Riaz	08.09.1968	07.09.2028	Peshawar	10 th	05.06.2009	17.09.2019	
81.	Inayat Ullah	10.04.1967	09.04.2027	M. Agency	D.Cem	05.06.2009	17.09.2019	
82.	Ali Asghar	04.01.1970	03.01.2030	Nowshera	M.A	05.06.2009	17.09.2019	
83.	Israr Ali	03.03.1972	02.03.2032	Peshawar	10 th	22.07.2013	17.09.2019	
84.	Murtaza	01.11.1967	31.10.2027	Mardan	F.A	08.08.2009	17.09.2019	
85.	Muhammad Azhar	22.07.1965	21.07.2025	Swabi	B.A	02.12.2009	17.09.2019	
86.	Jehanzeb	03.01.1970	02.01.2030	Peshawar	F.A	05.06.2009	17.09.2019	
87.	Muhammad Idrees	01.02.1968	31.01.2028	Charsadda	F.A	02.12.2009	17.09.2019	

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Superintendent EV,

Superintendent CPB,

Superintendent Secret,

Registrar

S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
88.	Wajid Ali	03.05.1971	02.05.2031	Peshawar	10 th	05.06.2009	17.09.2019	
89.	Ikram Ullah	15.09.1971	14.09.2031	D.I Khan	10 th	05.06.2009	17.09.2019	
90.	Muhammad Ashraf	10.01.1965	09.01.2025	Buner	10 th	05.06.2009	17.09.2019	
91.	Daud Shah	01.01.1968	31.12.2027	Buner	10 th	05.06.2009	17.09.2019	Awarded major punishment of reversion from lower post as Senior Clerk by RPO/Malakand vide order No. 9454/E, dated 07.10.2020. Later on, his major punishment has been converted in original rank as Assistant Grade Clerk and his period of absence is treated as leave without pay by Addl: IGP/HQrs: KP vide order No. 474-77/E-V, dated 12.02.2021.
92.	Sher Zamin	22.12.1968	21.12.2028	Buner	F.A	05.06.2009	17.09.2019	
93.	Amreez Khan	22.10.1970	21.10.2030	Buner	10 th	08.08.2009	17.09.2019	
94.	Syed Munawar Ali Shah	11.09.1970	10.09.2030	Peshawar	F.A	08.08.2009	17.09.2019	
95.	Fazal Wahab	08.02.1970	07.02.2030	Buner	F.A	08.08.2009	17.09.2019	
96.	Tariq Hameed	21.04.1968	20.04.2028	Abbottabad	F.A	02.12.2009	17.09.2019	
97.	Inam Ullah Jan	25.06.1969	20.06.2029	Peshawar	10 th	08.08.2009	17.09.2019	
98.	Sohail Ahmed	25.04.1970	24.04.2030	Peshawar	10 th	08.08.2009	17.09.2019	
99.	Fayaz Khan	14.12.1970	13.12.2030	Peshawar	10 th	08.08.2009	17.09.2019	
100.	Khalid Mehmood	16.12.1971	15.12.2031	Haripur	10 th	02.12.2009	17.09.2019	
101.	Sajid Hussain	23.09.1970	27.09.2030	Abbottabad	10 th	08.08.2009	17.09.2019	

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Superintendent EV,

Superintendent CPB,

Superintendent Secret,

Registrar

S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
102.	Muhammad Naeem Jan	15.03.1970	14.03.2030	Peshawar	F.A	08.08.2009	17.09.2019	
103.	Fayaz Ahmed	08.11.1968	07.11.2028	Charsadda	10 th	08.08.2009	17.09.2019	
104.	Anwar-Ul-Hassan	18.01.1970	17.01.2030	Nowshera	10 th	11.12.2012	17.09.2019	
105.	Akhtar Hussain -I	13.12.1964	12.12.2024	Charsadda	F.A	08.08.2009	17.09.2019	
106.	Hamid Ullah Jan	02.02.1968	01.02.2028	Khyber Agency	10 th	08.08.2009	17.09.2019	
107.	Javed Iqbal	11.04.1973	10.04.2033	Peshawar	10 th	08.08.2009	17.09.2019	
108.	Noor Khan	10.03.1969	09.03.2029	Nowshera	B.A	11.12.2012	17.09.2019	
109.	Nadeem Ullah	24.06.1970	23.06.2030	Peshawar	C.Com	11.12.2012	17.09.2019	
110.	Khaista Gul	03.01.1967	02.01.2027	Peshawar	10 th	08.08.2009	17.09.2019	
111.	Akhtar Hussain	11.04.1965	10.04.2025	D.I Khan	10 th	18.02.1988	12.03.2021	
112.	Farmanullah	12.03.1967	11.03.2027	Nowshera	10 th	06.03.1988	12.03.2021	
113.	Muhammad Zahid	04.04.1968	03.04.2028	Mansehra	10 th	24.03.1988	12.03.2021	
114.	Abdul Karim	01.05.1968	30.04.2028	Peshawar	F.A	09.04.1988	12.03.2021	
115.	Muhammad Bilal-I	24.02.1968	23.02.2028	Kohat	B.A	27.09.1988	12.03.2021	
116.	Ghaffar Ali	08.09.1666	07.09.2026	Charsadda	10 th	01.10.1988	12.03.2021	
117.	Muhammad Saeed	01.10.1968	30.09.2028	Mardan	F.A	10.12.1988	12.03.2021	
118.	Gohar Ali	05.05.1969	04.05.2029	Swabi	10 th	15.08.1988	12.03.2021	

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Superintendent EV,

Superintendent CPB,

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Registrar

S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
119.	Hussain Habib	10.05.1966	09.05.2026	Swabi	B.A	17.12.1988	12.03.2021	
120.	Fazal Khaliq	01.03.1966	28.02.2026	Chitral	B.A	16.11.1989	12.03.2021	
121.	Hayat Ullah	06.02.1967	05.02.2027	Mardan	F.A	16.07.1990	12.03.2021	
122.	Shah Zaman-I	02.09.1968	01.09.2028	Kohat	B.A	08.01.1990	12.03.2021	
123.	Muhammad Khurshid	05.03.1967	04.03.2027	Abbottabad	10 th	03.09.1990	12.03.2021	
124.	Akhtar Hussain-II	06.01.1967	05.01.2027	Chitral	F.A	01.03.1991	12.03.2021	
125.	Essa Khan	06.02.1970	05.02.2030	Malakand	10 th	06.04.1991	12.03.2021	
126.	Gul Karim	29.02.1965	28.02.2025	Charsadda	F.A	10.04.1991	12.03.2021 04.04.2021	The DPC meeting held on 04.03.2021 and recommended him to be conditionally promoted as Assistant Grade Clerk vide this office Notification No. 823-50/E-V, dated 12.03.2021. Later on, he was deffered due to non completion of missing ACR vide this office Notification No. 1178-88/E-V, dated 14.04.2021. After defferment he submitted Departmental appeal before the Competent Authority for his promotion which has been accepted and promoted with their colleagues. However, no financial benefits will be involved, vide this office order No.1076-84/E-V, dated 04.04.2022.
127.	Sultan Mehmood	01.03.1972	28.02.2032	Haripur	10 th	28.07.1991	12.03.2021	
128.	Guldar Alam	01.07.1969	30.06.2029	Swat	10 th	10.08.1991	12.03.2021	
129.	Ashraf Khan	30.04.1966	29.04.2026	Haripur	F.A	09.09.1991	12.03.2021	
130.	Shah Iran	01.04.1967	31.03.2027	Nowshera	F.A	20.10.1991	12.03.2021	

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ATTACHED

Superintendent EV,

Superintendent CPB,

Superintendent Secret,

Registrar

S.NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDUCATION	DATE OF ENLISTMEN/ PROMOTION AS SENIOR CLERK	DATE OF PROMOTION AS ASSISTANT	REMARKS
131.	Fazli Amin	01.05.1965	30.04.2025	Peshawar	10 th	02.05.1987	18.02.2012	<p>He was compulsory retired by the DIG, SB: vide Order No 676/EB Dated 15.01.2019, Later on he was reinstated into service by the Honorable Service Tribunal Khyber Pakhtunkhwa, Peshawar. Therefore, his re-instatement order into service was issued conditionally/provisionally vide order No 4847/EB Dated 30.06.2021 by the DIG, Special Branch KPK However, the Department has lodged CPLA in the Honorable Supreme Court of Pakistan against the decision of Service Tribunal Khyber Pakhtunkhwa, Peshawar.</p> <p>Therefore, the legal opinion was sort out from AIG/Legal CPO who opined that the back date seniority etc and further promotion will be assigned/granted as & when the CPLA is disposed of in favour of appellant officer. Hence, his name has been entered at the bottom in the Seniority List.</p>

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Superintendent EV,

Superintendent CPB,

Superintendent Secret,

Registrar

ATTESTED

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NOTE:- Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within one month after the issuance of this list, otherwise no representation will be entertained after the specific period.

(Signature)
(SONIA SHAMROOZ KHAN) psp
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. 3981-85 /EV, dated Peshawar, the 25 / 07 /2024.
Copy of above is forwarded for information and necessary action to the:-

- Addl: Inspector General of Police, in Khyber Pakhtunkhwa.
- Capital City Police Officer, Peshawar.
- Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
- Commandant, PTC, Hangu.
- All Regional Police Officers in Khyber Pakhtunkhwa.
- All Deputy Inspector General of Police, in Khyber Pakhtunkhwa.
- Chief Traffic Officer, Peshawar.
- Director, IT, CPO, Peshawar.
- All Branches in CPO, Peshawar.
- In-charge, Central Registry Cell, CPO, Peshawar.

Superintendent EV,

(Signature)
✓ Superintendent CPB,

~~Superintendent Secret,~~

(Signature)
Registrar

ATTESTED

F (22)
Respected Sir,

With due reverence, it is submitted that I was compulsory retired from Service due to an enquiry being baseless. I submitted a departmental Appeal which was rejected by the Competent Authority. Therefore, later on, I instituted a Service Appeal in Hon'ble Service Tribunal Khyber Pakhtunkhwa, Peshawar. The Hon'ble Service Tribunal accepted my appeal with the directions to re-instate me in the Service with all back benefits.

Similarly, the Department requested to Law Departmental for filing of CPLA against the Judgment of Hon'ble Service Tribunal. The request of Department was accepted for filing of CPLA which is still pending in August Supreme Court of Pakistan.

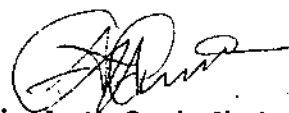
However, later on, I filed an Execution Petition in Hon'ble Service Tribunal Peshawar to implement the Judgment passed by the Hon'ble Service Tribunal, Peshawar which was accepted.

Hence, in compliance of the Judgment and Execution passed by the Hon'ble Service Tribunal, I was re-instated in Service by Department but my name was kept at the bottom of Seniority Lists issued on 31.12.2021 and 20.07.2024 despite of Judgment issued by the Hon'ble Service Tribunal.

It is pertinent to mention here that the promotion process of Assistant Grade Clerks to Office Superintendent is underway vide CPO's Letter No CPO/CPB/DSC128 Dated 24.07.2024. According to the latest Seniority List, I will be deprived from promotion as Office Superintendent as my name is existed at the bottom so. Besides, I am standing on the brink of Superannuation Pension with effect 30.04.2025

In view of above, it is therefore requested that my name may kindly be kept at the top of the Seniority List being most Senior Assistant Grade Clerk so that I could be promoted as Office Superintendent and to get financial benefit on humanitarian grounds.

Yours Obediently,



Fazal Amin, Asstt: Grade Clerk,
SSU, CPEC, Khyber Pakhtunkhwa,
Peshawar.

Dated 15.08.2024

~~ATTESTED~~

VAKALAT NAMA

NO. _____ /20

IN THE COURT OF KP Service Tribunal, Faisalabad

Fazal-e-Amir

Appellant
Petitioner
Plaintiff

VERSUS

Police Deptt

Respondent (s)
Defendants (s)

I Fazal-e-Amir (Appellant)

do hereby appoint

and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____ /20



(CLIENT)

ACCEPTED


SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT
BC-15-5643

CELL NO: 0306-5109438