


FORM OF ORDER SHEET

Court of _____

Appeal No. 1381/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26-Aug-24	<p>The appeal of Mr. Bashir Muhammad presented today by Mr. Javed Iqbal Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 23-Sep-24. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR.

Service Appeal No. 1381 / 2024

Ex. Inspector Police, Bashir Muhammad. Appellant.

VS

Inspector General Police KPK Peshawar etc.

I N D E X.

S. NO.	Description of document.	Annexure.	Pages.	
			From.	to
1.	Memo of appeal with affidavit.	-	4	5
2.	Copy of FIR.	A	6	7
3.	Copy of order of DIO dated 17.12.2020	B	-	8
4.	Judgement of Service Tribunal.	C	9	13
5.	Regional Police order dated. 11.01.2024.	-	14	15
6.	Seniority list.	D	16	17
7.	Application for re-presentation.	E	18	20
8.	Copies of ACRs.	F	21	25
9.	Promotion List.	-	26	-
10.	Requisition/Notification of acting DSP.	-	27	- 29
11.	Wakalatnama.	-		

Dated: 26.08.2024

Appellant.

Bashir Muhammad
Ex. Inspector.

through:-

Uaved Iqbal
Advocate General District Courts.
Mardan.
BC-10-4438
Distt. Kachera Mardan

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1381

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK
PESHAWAR

Service appeal No. 1381 / 2024

Bashir Muhammad (Rtd) Inspector R/o Nawan Killi Gujar
Garhi District Mardan.....(Appellant)

VERSUS

1. Inspector General of Police KPK Peshawar.
2. Deputy Inspector General Mardan region.
.....(Respondents)

Service appeal u/s 4 Service Tribunal Act 1974 for
granting ^{Promotion}performa^{at} the Rank of DSP in the light of order
DIG Mardan dated 11-1-2024.

Respectfully Sheweth: it is submitted as under:

FACTS:

1. That the appellant while posted at P.S Risalpur District Nowshera as Inspector/SHO was departmentally proceeded against the allegations that at the time of registration FIR No.645 dated 9-11-2020 U/s 9CCNSA against accused Muhammad Ishaq S/o Abid Khan and Haji Khan S/o Zahir has shown less quantity of the actual contraband narcotics and also replaced the actual contraband. **(Copy of FIR attached as annex A).**

Handwritten signature and stamp:
Javed Khalid Advocate
Dist: Kache

2. That the departmental enquiry was conducted and consequently, the appellant was awarded the punishment of Reduction from the rank of Inspector. **(Copy of order of DPO dated 17-12-2020 as annex B).**
3. That after failure of departmental appeal the appellant filed a service appeal in service tribunal court KPK Peshawar which was accepted and the case was remanded back to the department for de novo enquiry vide the attached **judgment of service tribunal dated 3-8-23 as Annex C).**
4. That inasmuch so, in consequent upon de novo enquiry the appellant was exonerated from the alleged charges and was restored to the original Rank of Inspector with back benefit. **(Vide the attached order of Regional Police Officer dated 11-1-2024).**
5. That during the reduction period the appellant worked as sub-inspector with dedication and devotion, while meantime as per seniority list all his junior were promoted in the rank of DSP vide the attached seniority list as Annex D).
6. That the appellant was by that time at the verge of retirement therefore, on 15-05-2024 made a representation to the respondents No.1 and requested promotion to the Rank of DSP in the light of order of Regional Police dated 11-1-2024. However the same was kept pending till now and the appellant retired from his service on 30-5-2024 without getting his back benefit including promotion.

(The copy representation is as annex E).

7. That the appellant thus aggrieved by the dormant act by respondents has come to the August court for his due legal right on the following grounds.

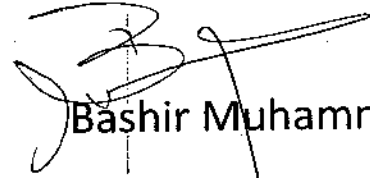
GROUND:

1. That the appellant has meted out high discrimination and prejudiced by not giving back benefit which includes the right of promotion.
2. That the appellant has suffered lot of mental and financial trouble during three year of trial in the service tribunal.
3. That during the period of deduction of rank the appellant has performed all of his duties with devotion and dedication and earned consecutively 5 (A) reports from high officer and it cannot be emulated by other officer in any way vide attached copy of the said ACR's as annex F.
4. That the appellant has got 40 years unblemished service in his credit and reached to the Rank of Inspector by sheer his hard work and honestly.
5. That by giving promotion to the Rank of DSP according to the original seniority list no other of police officer is to be effected.
6. That any other grounds which has not been mentioned may also be allowed to argue at the time of arguments.

PRAYER:

It is humbly prayed that on acceptance of the instant petition the respondents may kindly be directed to grant promotion to Rank of DSP as per seniority list in greater interest of justice.

Dated: 26-08-2024



Bashir Muhammad

Retired Inspector

R/o Nawan Killi Gujar Garhi

District Mardan

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK
PESHAWAR**

Service appeal No. _____ / 2024

Bashir Muhammad (Rtd) Inspector R/o Nawan Killi Gujar
Garhi District Mardan.....(Appellant)

VERSUS

3. Inspector General of Police KPK Peshawar.

4. Deputy Inspector General Mardan region.

.....(Respondents)

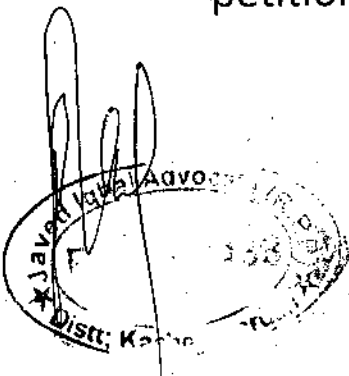
AFFIDAVIT

It is solemnly affirmed and declared on oath that all the contents mentioned above in the service appeal are true and correct to the best of my knowledge and belief. And nothing has been concealed therein. Similarly such like petition has been filed in any other court of law.

Deponent:

Bashir Muhammad

Through Counsel:



A handwritten signature in black ink, consisting of a stylized 'B' followed by a horizontal line and a vertical line extending downwards.

بسم الله الرحمن الرحيم

الحمد لله الذي هدانا لهذا الذي كنا لنهتدي لولا أن هدانا الله

بسم الله الرحمن الرحيم

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09-11-2020
A.S.P.P

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POLICE DEPARTMENT

DISTRICT NOWSHERA

ORDER

This order will dispose of the departmental enquiry initiated under Khyber Pakhtunkhwa Police Rules-1975, against Inspector Muhammad Bashir, under the allegations that he while posted as SHO PS Risalpur, registered case vide FIR No. 645 dated 09.11.2020 u/s 9 D CNSA PS, Risalpur against accused Muhammad Ishaq s/o Abid Khan and Haji Khan s/o Zakir Khan residents of Qambar Khel, Bara, District Khyber, wherein he showed the contraband less than the actual quantity seized by him. Besides, the original contraband was also replaced / changed by him.

On account of which, he was suspended, closed to Police Lines and proceeded against departmentally through DSP HQrs: Nowshera, who after fulfillment of legal formalities submitted his report to undersigned vide his office. No. 445 / St dated 01.12.2020, wherein the allegations leveled against him have been proved and was recommended for awarding major punishment.

He was served with Final Show Cause Notice, to which, he submitted his reply which was perused by the undersigned and found unsatisfactory.

He was heard in orderly room by the undersigned wherein he failed to produce any cogent reason in his defense, therefore, he is hereby awarded major punishment of reduction in rank (substantive rank of Inspector to Sub-inspector) and re-instated in service with immediate effect, in exercise of powers vested in me under Khyber Pakhtunkhwa Police Rules-1975.

OB No. 1221

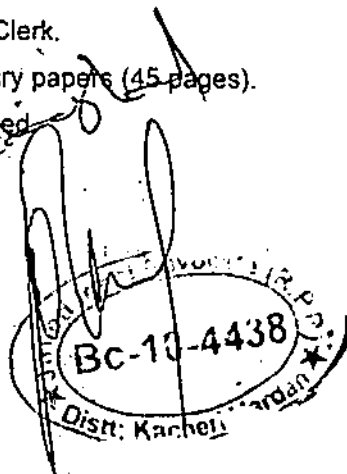
Dated 17/12 / 2020

No. 3371-75 /PA, dated Nowshera, the 17/12 /2020.

Copy for information and necessary action to the:

1. Regional Police Officer, Mardan.
2. Pay Officer.
3. Establishment Clerk.
4. FMC with enquiry papers (45 pages).
5. Official concerned.

[Signature]
District Police Officer,
Nowshera



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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 2765/2021

BEFORE: MRS. RASHIDA BANO ... MEMBER (J)
MISS FAREEHA PAUL ... MEMBER (E)

Bashir Muhammad Sub-Inspector of Police MR-31 District Nowshera.
..... (Appellant)

VERSUS

1. Inspector General of Police Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police Mardan Region Mardan.
3. District Police Office Mardan.

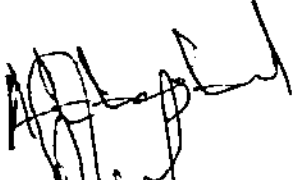
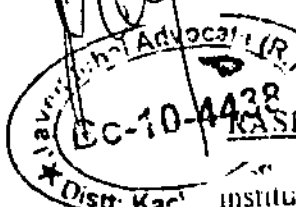
..... (Respondents)


Mr. Javid Iqbal
Advocate ... For appellant

Mr. Fazal Shah Mohmand
Additional Advocate General ... For respondents


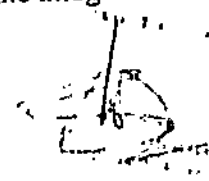
Date of Institution.....12.02.2021
Date of Hearing.....03.08.2023
Date of Decision.....03.08.2023

JUDGMENT



RASHIDA BANO, MEMBER (J): The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:


"On acceptance of this appeal, order dated 17.12.2020 and 15.01.2021 may kindly be set aside and appellant be reinstated in the previous rank of Inspector with all back benefits."

2. Brief facts of the case, as given in the memorandum of appeal are, that the appellant while posted as Inspector/-HO Risalpur was departmentally proceeded against on the allegations that he less quantity

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of contraband narcotic and replaced it while registering case FIR No. 645 U/S 9(D) CNSA Police Station Risalpur District Nowshera dated 09.11.2020 against the accused Muhammad Ishaq and Haji Khan R/O Qamber Khel District Khyber. The appellant was issued charge sheet alongwith statement of allegations by DPO Nowshera for the alleged misconduct and DSP Headquarter was appointed as enquiry officer. After departmental enquiry final show cause notice was issued to the appellant upon which he submitted reply. Thereafter, major punishment of reduction in rank was imposed upon him. The appellant filed departmental appeal which was rejected vide order dated 17.12.2021, hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Additional Advocate General and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that the appellant was not treated in accordance with law and rules and the orders passed by the respondents are unlawful in the eyes of law. He contended that neither the Narcotic was less than the actual recovery nor it was replaced because the factum of recovery of Narcotic has been proved by the statements of PWS and FSL report during the investigation which was further substantiated by video of the accused in a press conference. No one has made any complaint about the less quantity and replacement of Narcotic. He further contended that all allegations were made on mere hearsay, only to create dent in prosecution case and rescue the accused from the clutches of law. He submitted that enquiry was conducted in haphazard manner and no rules and regulations have been followed. Lastly, he submitted that enquiry







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officer by his designation of his scale is not authorized to conduct enquiry against the appellant. therefore, he requested for acceptance of the instant appeal.

5. The learned Additional Advocate General contended that the appellant was treated in accordance with law and rules. He further contended that appellant while posted as SHO Risalpur registered case FIR No. 645 U/S 9(D) CNSA Police Station Risalpur District Nowshera dated 09.11.2020 wherein he showed the contraband less than quantity and also replaced by him which amounts to gross misconduct on his part and rendered him liable for punishment under the Khyber Pakhtunkhwa, Police Rules, 1975. Departmental enquiry was conducted and after fulfillment of all codal formalities major penalty of reduction in rank was imposed upon the appellant.

6. Perusal of record reveals that appellant was issued show cause notice alongwith statement of allegation on 12.11.2020 by appointing DSP IIQRs as enquiry officer, who after completing codal formalities submitted his report on 01.11 2020. As a result of inquiry report, final show cause notice was issued to the appellant to which he submitted reply and was finally awarded punishment of reduction in rank from Inspector to Sub-Inspector vide impugned order dated 17.12.2020. Appellant filed departmental appeal on 24.12.2020 which was rejected on 15.01.2021, while instant service appeal is filed on 12.02.2021. Charge sheet was issued with the allegation that while posted as SHO P.S Risalpur, now under suspension at Police Lines, registered case vide FIR No. 645 dated 09.11.2020 U/S 9(D) CNSA P.S, Risalpur against accused Muhammad Ishaq S/O Abid Khan and Haji Khan S/O Zakir Khan wherein he showed the contraband less than the actual amount which amounts to grave misconduct on his part and rendered

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him liable for punishment under Khyber Pakhtunkhwa Police Rules, 1975. Saif Ali Khan was appointed as Enquiry Officer who was Inspector (BPS-16) in rank and was transferred/posted on acting charge basis vide order dated 21.10.2020. So inquiry officer on 12.11.2020 till submitting of his report dated 01.12.2020, was Inspector and was not DSP. Under law Rule 5(4) the inquiry officer must be senior in rank to the accused official, so inquiry proceedings conducted by Inspector is against the Police Rules, 1975 as the accused/appellant himself was Inspector at the time of inquiry. Therefore, this inquiry was not in accordance with law and rules being conducted by the officer of the same rank i.e Inspector (BPS-16) to that of appellant.

7 It is a well settled legal proposition duly supported by numerous judgments of the apex court that for imposition of major penalty, regular inquiry by providing opportunity of cross examination is a must. Reliance is placed on 2022 PLC (CS) 985 and 2019 PLC (CS) 224. Moreover, no opportunity of cross examination was provided to the appellant upon the witness who disposed in inquiry against him which is very essential element of regular inquiry. Beside that witnesses who disposed against the appellant also recorded their statement in court of law in that criminal case wherein they supported on oath. Contents of FIR where less quantity of contraband was shown in record. This is also speak otherwise and was not in consonance with their statement recorded during inquiry rather was in contradiction of it.

8. In view of the above, instant appeal is partially allowed. Case is remitted back to the department with direction to conduct denovo inquiry within 90 days of the receipt of this judgment by appointing officer higher in rank from the appellant and also to provide opportunity of self defense

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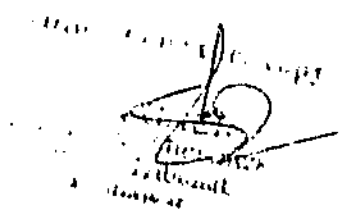
and personal hearing to the appellant. The issue of back benefits shall be subject to the outcome of denovo inquiry. Costs shall follow the event. Consign.

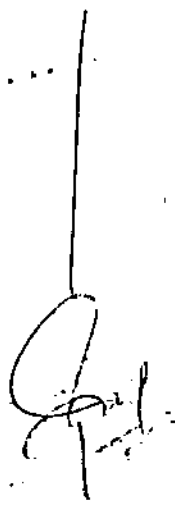
9. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 3rd day of August, 2023.


(FAREEHA PAUL)
Member (E)


(RASHIDA BANO)
Member (J)

*Kasimullah





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29/08/2023

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MR

ORDER.

This order will dispose-off the de-novo enquiry proceedings initiated against Sub Inspector Muhammad Bashir No. MR/31 of Investigation Wing, Mardan on the allegations that he while posted as SHO Police Station Risalpur, registered case vide FIR No. 645 dated 09.11.2020 u/s 9D CNSA Police Station Risalpur against accused Muhammad Ishaq s/o Abid Khan and Haji Khan s/o Zakir Khan residents of Qambar Khel, District Khyber, wherein he has shown less quantity of the contraband than the actual quantity seized by him. He also changed/ replaced the original contraband.

Facts leading to the issue in question are as under:-

The delinquent Officer while posted as SHO Police Station Risalpur, registered case vide FIR No. 645 dated 09.11.2020 u/s 9D CNSA Police Station Risalpur against accused Muhammad Ishaq s/o Abid Khan and Haji Khan s/o Zakir Khan residents of Qambar Khel, District Khyber, wherein he has shown less quantity of the contraband than the actual quantity seized by him. He also changed/ replaced the original contraband.

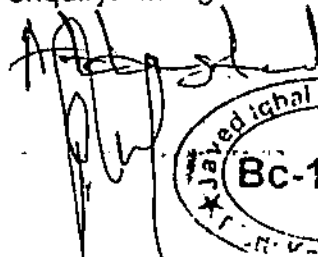
Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Deputy Superintendent of Police, Headquarter, Nowshera was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings to District Police Officer, Nowshera, wherein he recommended the delinquent Officer for major punishment.

He was issued Final Show Cause Notice to which his reply was received and found unsatisfactory.

He was also provided opportunity of self defense by summoning him in the Inquiry Room by the District Police Officer, Nowshera, but he failed to advance any reasons in his defense. Hence, he was awarded major punishment of reduction in rank from rank of Inspector to his substantive rank of Sub Inspector vide OIB: No. 1271 dated 17.12.2020.

Feeling aggrieved from the order of District Police Officer, Nowshera, the appellant preferred the departmental appeal. He was summoned and heard in person in Inquiry Room held in this office on 12.01.2021.

After rejecting his departmental appeal by this office as well as Revision Petition by Central Police Officer, Peshawar, the above named delinquent Officer approached Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar in the shape of Appeal No. 2765/2021. The Khyber Pakhtunkhwa Service Tribunal Peshawar vide Order dated 03.08.2023 partially allowed the appeal of the appellant and directed the department to conduct de-novo enquiry within 90 days of the receipt vide Order dated 03.08.2023 with the directions that the department is at liberty to hold de-novo proceedings within (03) months with leaving the issue of back benefits to the outcome of de-novo enquiry. In light of above, the District Police Officer,


Javed Iqbal Advocate
Bc-10-4438
IR.P.P.

(15)

Nowshera vide his office Memo: No. 44/Legal dated 28.08.2023 endorsed a letter to Assistant Inspector General of Police, Legal Khyber Pakhtunkhwa, Peshawar for initiating de-novo proceedings against the above named Sub Inspector.

In response, the Assistant Inspector General of Police, Legal Khyber Pakhtunkhwa, Peshawar vide his office Memo: No. 3539/Legal dated 07.09.2023 endorsed a letter to this office wherein it was mentioned that Regional Police Officer, Mardan may be conveyed for compliance of the orders of Honorable Khyber Pakhtunkhwa Service Tribunal.

Hence, de-novo enquiry was entrusted to the Superintendent of Police Investigation, Mardan vide this office letter No. 6285/ES dated 25.09.2023. The enquiry Officer after conducting de-novo enquiry submitted his findings vide his office letter No. 1065/P/Inv. dated 16.11.2023 wherein he recommended the delinquent Officer for awarding major punishment.

After going through the enquiry report, the delinquent Officer was issued Show Cause Notice vide this office Memo: No. 7953/ES dated 01.12.2023 to which he submitted his reply the same was perused. He was also summoned and heard in person in Orderly Room held in this office on 03.01.2024.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations against the appellant have been proved beyond any shadow of doubt. However, the appellant has about 40 years approved service at his credit who is also at the verge of retirement on superannuation pension and has also a poor financial back ground, therefore, the undersigned is constrained to take a lenient view of the misconduct of the delinquent Officer.

Keeping in view the above, I, **Muhammad Suleman, PSP Regional Police Officer, Mardan**, hereby restore the delinquent Officer to his original rank of Inspector from the date of his reduction with all back benefits.

Order Announced.

(MUHAMMAD SULEMAN) PSP
Regional Police Officer,
Mardan.

JES, Dated Mardan the 11 / 01 / 2024
Copy forwarded for information and necessary action to the:-
District Police Officer, Nowshera.
Superintendent of Police Investigation, Mardan.
(*****)

Seniority No.	Name & No.	Home District	D.O. Birth	D.O. SI Promotion	D.O confirmation as SI as per Police Rules 13.18	D.O Admn: to List "F"	D.O Promotion as Offg: Inspector	D.O CONF: as Inspector	Remarks
197.	Abid Saeed No. P/41	Peshawar	31.10.1965	27.09.2011	27.09.2013	10.05.2017	10.05.2018	10.05.2020	
198.	Akhter Gul No. P/276	Charsadda	12.04.1965	27.09.2011	27.09.2013	05.11.2014	05.11.2014	05.11.2016	
199.	Muhammad Nawaz No. P/42	Nowshera	21.02.1967	27.09.2011	27.09.2013	10.05.2017	12.12.2018		
200.	Fazli Karim No. P/277	Charsadda	01.09.1967	27.09.2011	27.09.2013	05.11.2014	05.11.2014	05.11.2016	
201.	Ibrahim Khan No. P/313	Peshawar	13.05.1966	27.09.2011	27.09.2013	19.10.2015	19.10.2015	19.10.2017	
202.	Zakir Ullah No. P/308	Peshawar	02.11.1963	27.09.2011	27.09.2013	19.10.2015	19.10.2015	19.10.2017	
203.	Muhammad Ghani No. P/314	Mardan	25.01.1966	27.09.2011	27.09.2013	19.10.2015	19.10.2015	19.10.2017	
204.	Muhammad Tahir No. P/290	Nowshera	15.04.1969	27.09.2011	27.09.2013	05.11.2014	05.11.2014	05.11.2016	
205.	Imtiaz Khan No. P/45	Peshawar	02.04.1966	27.09.2011	27.09.2013	10.05.2017	10.05.2018	10.05.2021	
206.	Safdar Khan No. P/74	Peshawar	04.08.1963	27.09.2011	27.09.2013	10.05.2017	10.05.2018	10.05.2020	
207.	Dost Muhammad No. P/278	Charsadda	04.01.1967	27.09.2011	27.09.2013	05.11.2014	05.11.2014	05.11.2016	
208.	Anwar Ali No. P/363	Mardan	04.06.1964	27.09.2011	27.09.2013	19.07.2016	12.12.2018		
209.	Imdad Ullah No. P/376	Mardan	04.02.1970	27.09.2011	27.09.2013	19.07.2016	12.12.2018		
210.	Irshad Ali No. P/377	Mardan	14.05.1972	27.09.2011	27.09.2013	19.07.2016	12.12.2018		
211.	Ismail Shah No. P/378	Nowshera	01.03.1969	27.09.2011	27.09.2013	19.07.2016	22.10.2019		
212.	Muhammad Naeem No. P/379	Peshawar	01.12.1966	27.09.2011	27.09.2013	19.07.2016	12.12.2018		
213.	Jamal Shah No. 180/M	Dir Lower	08.03.1988	11.10.2011	11.10.2013	12.08.2015	12.08.2015	12.08.2017	
214.	Sultan Khan No. 37/M	Chitral	05.03.1963	11.10.2011	11.10.2013	13.03.2017	22.10.2019		
215.	Habib ur Rehman No. 165/M	Chitral	12.03.1967	11.10.2011	11.10.2013	12.08.2015	12.08.2015	12.08.2017	
216.	Ibar Khan No. 181/M	Shangla	01.04.1969	11.10.2011	11.10.2013	12.08.2015	12.08.2015	12.08.2017	
217.	Hazrat ud Din No. 211/M	Chitral	21.12.1967	11.10.2011	11.10.2013	12.08.2015	12.08.2015	12.08.2017	
218.	Aurang Zeb No. 455/M	Mardan	01.01.1963	11.10.2011	11.10.2013	19.07.2016	23.02.2017	23.02.2019	
219.	Sajjad Hussain No. 251/M	Chitral	11.03.1974	11.10.2011	11.10.2013	12.08.2015	12.08.2015	12.08.2017	
220.	Umar Raziq No. 256/M	Swat	08.01.1971	11.10.2011	11.10.2013	19.07.2016	23.02.2017	23.02.2019	
221.	Muhammad Zaman No. 274/M	Buner	01.01.1970	11.10.2011	11.10.2013	19.07.2016	23.02.2017	23.02.2019	
222.	Nazeer Muhammad No. K/130	Kohat	18.03.1964	13.10.2011	13.10.2013	22.09.2016	12.12.2018		
223.	Gul Sher Khan MR/99	Swabi	03.03.1968	29.11.2011	29.11.2013	05.11.2014	05.11.2014	05.11.2016	
224.	Muhammad Saeed No. MR/27	Swabi	20.10.1966	29.11.2011	29.11.2013	05.11.2014	05.11.2014	05.11.2016	
225.	Muslim Shah No. MR/29	Mardan	09.03.1970	29.11.2011	29.11.2013	05.11.2014	05.11.2014	05.11.2016	
226.	SI Muhammad Bashir No. MR/31	Mardan	31.05.1964	29.11.2011	29.11.2013	05.11.2014	05.11.2014	05.11.2016	Reverted to the rank of SI vide DPO/Nowshera order No.1221, dated 17.12.2020
227.	Sardar Hussain No. MR/117	Mardan	03.01.1973	29.11.2011	29.11.2013	19.07.2016	23.02.2017	23.02.2019	

REVISED SENIORITY LIST OF INSPECTORS OF KHYBER PAKHTUNKHWA, POLICE.

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Seniority No.	Name & No.	Home District	D.O. Birth	D.O. SI Promotion	D.O confirmation as SI as per Police Rules 13.18	D.O Adm: to List "F"	D.O Promotion as Offg: Inspector	D.O CONF: as Inspector	Remarks
228.	Muhammad Ajmal H/72	Munsehra	01.01.1967	24.07.2007 (arrival from Sindh Police on 07.01.2014)	07.01.2014	05.11.2014	05.11.2014	05.11.2016	
229.	Muhammad Fayaz No. MR/12	Swabi	06.05.1965	02.02.2012	02.02.2014	25.05.2015	25.05.2015	25.05.2017	
230.	Shad Ali No. MR/41	Swabi	14.12.1971	02.02.2012	02.02.2014	25.05.2015	25.05.2015	25.05.2017	
231.	Syed Jamil No. MR/06	Swabi	03.04.1963	02.02.2012	02.02.2014	25.05.2015	25.05.2015	25.05.2017	
232.	Salih Muhammad Khan No. MR/122	Swabi	01.01.1963	02.02.2012	02.02.2014	19.07.2016	22.10.2019		
233.	Muslim Shah No. 4/M	Huner	21.12.1970	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
234.	Aman Khan No. 210/M	Swat	05.04.1976	03.02.2012	03.02.2014	19.07.2016	23.02.2017	23.02.2019	
235.	Said Rahim No. 354/M	Shangla	15.07.1971	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
236.	Amir Bahadar No. 370/M	Swat	01.04.1963	03.02.2012	03.02.2014	13.03.2017	22.10.2019		
237.	Muhammad Alim No. 477/M	Shangla	09.03.1971	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
238.	Sardar Nawaz No. 478/M	Chitral	04.03.1966	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
239.	Molvi Shah No. 480/M	Chitral	12.04.1970	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
240.	Zahir Shah No. 483/M	Mardan	12.02.1963	03.02.2012	03.02.2014	19.07.2016	12.12.2018		
241.	Muhammad Iqbal No. 484/M	MKD Agy	01.05.1965	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
242.	Ghulam Nabi No. 485/M	Swat	24.03.1969	03.02.2012	03.02.2014	12.05.2015	12.08.2015	12.08.2017	
243.	Fazal Rahim 486/M	Chitral	01.05.1964	03.02.2012	03.02.2014	19.07.2016	23.02.2017	23.02.2019	
244.	Bakht Aqil No. 487/M	Shangla	01.06.1967	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
245.	Abdul Aziz No. 489/M	Chitral	21.12.1964	03.02.2012	03.02.2014	13.03.2017	16.04.2020		
246.	Iqbal ud Din No. 492/M	Chitral	15.03.1968	03.02.2012	03.02.2014	13.03.2017	22.10.2019		
247.	Fazal Rabbi No. 494/M	MKD AGY	12.02.1963	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
248.	Fazal Mahood No. 495/M	MKD Agy	06.01.1966	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
249.	Ahaf Hussain No. 497/M	Mardan	02.04.1965	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
250.	Nasir Ullah No. 499/M	Chitral	02.02.1969	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
251.	Faiz Mohammad No. 500/M	Chitral	04.04.1967	03.02.2012	03.02.2014	13.03.2017	22.10.2019		
252.	Amir Zeb No. 501/M	Swat	03.03.1967	03.02.2012	03.02.2014	19.07.2016	23.02.2017	23.02.2019	
253.	Rafi Ullah No. 502/M	Shangla	15.04.1965	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
254.	Muhammad Anwar No. 503/M	Mardan	10.04.1966	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
255.	Sher Raja No. 504/M	Chitral	12.12.1965	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
256.	Mazoom Khan No. 506/M	MKD Agy	10.04.1968	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
257.	Bakht Zada 507/M	Dir Lower	04.05.1963	03.02.2012	03.02.2014	19.07.2016	23.02.2017	23.02.2019	
258.	Shaheen Shah No. 509/M	Swat	01.04.1969	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	
259.	Muqaddar Khan No. 510/M	Dir Lower	12.04.1967	03.02.2012	03.02.2014	19.07.2016	23.02.2017	23.02.2019	
260.	Fazal Wahab No. 512/M	Swat	10.10.1964	03.02.2012	03.02.2014	12.08.2015	12.08.2015	12.08.2017	

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17

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REVISED SENIORITY LIST OF INSPECTORS OF KHYBER PAKHTUNKHWA POLICE

12

Government of Khyber Pakhtunkhwa
Office of the Regional Police Officer,
Mardan

Phone No. 0937-9230113, Fax No. 0937-9230115.
Email Address: - esrpomardan@gmail.com

To : The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. *1422* /ES, dated Mardan Region, the *17* /05/2024.

Subject: APPLICATION

Memo:

Enclosed please find herewith a self explanatory application of Muhammad Bashir Khan No. 31/MR Acting Deputy Superintendent of Police of this Region, requesting therein for appearance before the Worthy Inspector General of Police Khyber Pakhtunkhwa, the same is sent herewith, please.

Najeed

(Najeed-ur-Rohman Bugvi) PSP
Regional Police Officer,
Mardan
17/5/24

Abbas

Advocate (R.P.O.)
EC-10-4438
Distt: Kachera

15-05-2024

جناب عالی

الحمد لله

(Handwritten signature)

جناب عالی کے لئے،
محمد بن عبد اللہ

Annual Confidential report on the working of Assistant Sub-Inspectors, Sub-Inspectors and Inspectors for the year ending 31st December 2019.

Name, Province or Range No. Rank and Grade
 Inspector Bushir Muhammad No. 31/MR.
 Wali Muhammad
 From 01.01.2019 to 22.01.2019, as OII PS City.
 From 23.01.2019 to 12.06.2019, Investigation Office.
 From 13.06.2019 to 16.10.2019, as OII PS SMT.
 From 17.10.2019 to 31.12.2019, as OII PS Suro Shah.

(Type of Superintendent of Police Report: A, B or C) 'A'

Is he honest? 'No Complaint'

Remarks by: (1) Superintendent of Police, (2) Deputy Inspector, General of Police.

From 01.01.2019 to 17.04.2019.

(Gul Nawaz Jatto) Superintendent of Police, Investigation, Mardan.

[Signature]

From 18.04.2019 to 31.12.2019.

A hardworking and intelligent police investigator.

(Muhammad Ayes) Superintendent of Police, Investigation, Mardan.

[Signature]

Deputy Inspector General of Police, Admin. Invt. Cell, M. Peshawar.

I agree

[Signature]

[Handwritten notes]

CONFIDENTIAL

DISTRICT MAJIDAN

POLICE DEPARTMENT

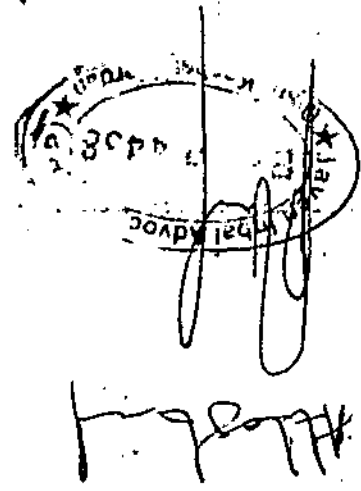
Annual Confidential report on the working of Assistant Sub-Inspectors, Sub Inspectors and Inspectors for the year ending 31st December 2020.

Inspector Iqbal Muhammad No. 31/MR.	Rank and Grade
Wali Muhammad.	Father's Name
From 01.01.2020 to 08.05.2020, as OII PS Suro Shah.	Where and on what duties
From 09.05.2020 to 16.10.2020, as OII PS SBC.	employed during the past 12 months
	Class of Superintendent of Police
	Report, i.e. A, B or C
	Is he honest?
	Remarks By:-
	(1) Superintendent of Police,
	(2) Deputy Inspector, General of Police.

A hardworking and competent
 Police Investigator.

(Muhammad Asif)
 Superintendent of Police,
 Investigation, Majidan.

Z. Akbar
 Deputy Inspector General of Police,
 Admin-Invt. CPO KP Peshawar

Attest


Police No. 99

GS&PD.NWFP.1677-D.S-1000 P of -7.3.1994 (47)

No. 13-17

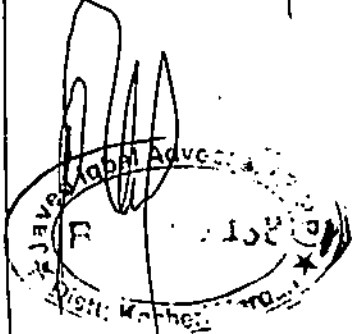
POLICE DEPARTMENT

DISTRICT MARDAN

Annual Confidential report on the working of Assistant Sub-Inspectors, Sub Inspectors and Inspectors for the year ending 31st December 2021.

Name, Provincial or Range No. Rank and Grade	SI Bashir Muhammad No. 31/MR
Father's Name	Wali Muhammad
Where and on what duties employed during the past 12 months	From 26.05.2021 to 28.06.2021, Bureau of Investigation. From 29.06.2021 to 28.12.2021, as OII PS Kallang. From 29.12.2021 to 31.12.2021, as OII PS City.
Class of Superintendent of Police Report, i.e A, B or C	" A "
Is he honest?	Honest officer
Remarks By:- (1) Superintendent of Police, (2) Deputy Inspector, General of Police.	One of the best investigation officer.

Allo



Agreed

Z. Afghar

Deputy Inspector General of Police
Administration, C/O. P. P. Shuhra

(Sana Ullah Bettani)
Superintendent of Police,
Investigation, Mardan.

26-05-2021 to 31-12-2021
01-01-2022 to 31-12-2022
01-01-2023 to 31-12-2023

Re: ACR (in-original) in r/o
Bashir Muhammad NO/MR/31
Received by hand dt 04/03/24

M. Adrees O/c

[Signature]
04/03/24

24

Police No. 99

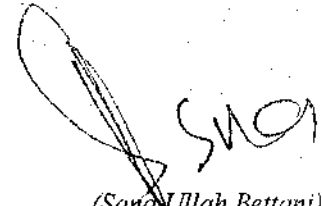
GS&PD.NWFP.1677-D.S-1000 P of -7.3.1994 (47)

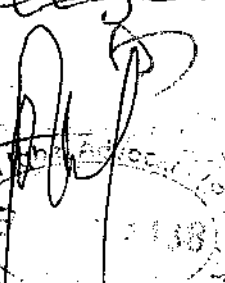
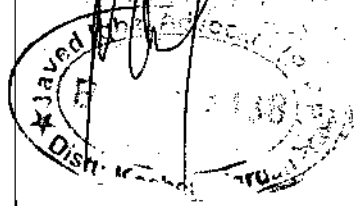
No. 13-17

POLICE DEPARTMENT

DISTRICT MARDAN

Annual Confidential report on the working of Assistant Sub-Inspectors, Sub Inspectors and Inspectors for the year ending 31st December 2022.

Name, Provincial or Range No. Rank and Grade	SI Bashir Muhammad No. 31/MR
Father's Name	Wali Muhammad
Where and on what duties employed during the past 12 months	From 01.01.2022 to 19.07.2022, as OII PS City. From 20.07.2022 to 10.11.2022, as OII PS Jabbar. From 11.11.2022 to 31.12.2022, as OII PS City.
Class of Superintendent of Police Report, i.e A, B or C	(A)
Is he honest?	Yes
Remarks By:- (1) Superintendent of Police, (2) Deputy Inspector, General of Police.	<i>An efficient officer</i>  (Sana Ullah Bettani) Superintendent of Police, Investigation, Mardan.

Alleged



POLICE DEPARTMENT

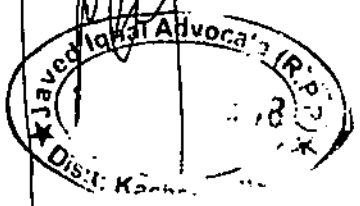
DISTRICT MARDAN

Annual Confidential report on the working of Assistant Sub-Inspectors, Sub Inspectors and Inspectors for the year ending 31st December 2023.

Name, Provincial or Range No. Rank and Grade	SI Bashir Muhammad No. 31/MR
Father's Name	Wali Muhammad
Where and on what duties employed during the past 12 months	From 01.01.2023 to 22.03.2023, as OII PS City. From 23.03.2023 to 23.05.2023, as IO PS City. From 24.05.2023 to 17.08.2023, as OII PS City. From 18.08.2023 to 31.12.2023, as OII PS Hoti.
Class of Superintendent of Police Report, i.e A, B or C	"A"
Is he honest?	<i>Honest police officer.</i>
Remarks By:- (1) Superintendent of Police, (2) Deputy Inspector, General of Police.	<p><u>From 01.01.2023 to 03.05.2023.</u></p> <p><i>A very devoted, efficient professional police officer and outstanding investigation officer.</i></p> <p style="text-align: right;"><i>[Signature]</i> (Sana Ullah Bettani) PSP Superintendent of Police, Investigation, Mardan</p> <p><u>From 04.05.2023 to 31.12.2023.</u></p> <p><i>A professional and hard working officer who has a good command over investigation work.</i></p> <p style="text-align: right;"><i>[Signature]</i> (Muhammad Suliman) PSP Superintendent of Police, Investigation, Mardan</p>

Agreed

[Handwritten signatures and initials]





26

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA

Dated Peshawar the 20/12/2023

NOTIFICATION

No. CPO/E-II/Promotion/ 3289. In pursuance of the provision contained in Section-5 of the Promotion Rules-2007, Standing Order 03/2022 and on the recommendations of Departmental Selection Committee meeting held on 20th December, 2023, the following Inspectors (BS-16) (Executive) of Khyber Pakhtunkhwa Police are hereby promoted to the rank of Deputy Superintendents of Police (BS-17) on regular basis with immediate effect.

2. The officers on promotion shall remain on probation for a period of one year in terms of Section 8 (2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Their promotions shall take effect from the date they actually assume the charge of their higher responsibilities: -

S#	Name of officers & No.	S#	Name of officers & No.
1.	Mr. Darwaah Khan	17.	Mr. Irahnd Ali
2.	Mr. Amjad Ali	18.	Mr. Jamal Shah
3.	Mr. Ghulam Murtoza	19.	Mr. Ibar Khan
4.	Mr. Shah Hussain	20.	Mr. Sajjad Hussain
5.	Mr. Musa Khan	21.	Mr. Umar Raziq
6.	Mr. Muhammad Qayyum	22.	Mr. Muhammad Zaman
7.	Mr. Amir Muhammad ✓	23.	Mr. Muslim Shah ✓ 233
8.	Mr. Farman Ullah ✓	24.	Mr. Aman Khan ✓ 234
9.	Mr. Hazrat Ali ✓	25.	Mr. Said Rahim ✓ 235
10.	Mr. Abdur Rauf 334 ✓	26.	Mr. Muhammad Atim ✓ 237
11.	Mr. Sardar Hussain 348 ✓	27.	Mr. Molvi Shah ✓ 239
12.	Mr. Qaiser Khan ✓	28.	Mr. Ghulam Nabi ✓ 242
13.	Mr. Abid Saeed ✓	29.	Mr. Bakht Aqil ✓ 244
14.	Mr. Ibrahim Khan ✓	30.	Mr. Fazal Mabood ✓ 248
15.	Mr. Muhammad Ghani ✓	31.	Mr. Sher Raj ✓ 255
16.	Mr. Imtiaz Khan		

4. Their posting Notification will be issued separately.

Sd/-

(Dr. ISHTIAQ AHMAD KHAN) PSP
Addl: Inspector General of Police,
Investigation, Khyber Pakhtunkhwa

Endst. No. & date even.

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. All Addl: Inspectors General of Police in Khyber Pakhtunkhwa.
3. All Deputy Inspectors General of Police in Khyber Pakhtunkhwa.
4. All Heads of Units/RPOs, in Khyber Pakhtunkhwa.
5. Addl: Director General (Elections-I), Election Commission of Pakistan, Islamabad w/r to his office letter No. F.10(1)/2023-Elec-II, dated 04.04.2023.
6. PSO to IGP Khyber Pakhtunkhwa.
7. AIG Legal CPO Peshawar.
8. District Accounts Officers concerned.
9. Registrar, CPO Peshawar.
10. Officers concerned.
11. Supdt: Secret, E-II & CPB CPO Peshawar.
12. Accountant CPO, Peshawar.
13. U.O.P File

(RIZWAN MANZOOR) ✓
DIG/Headquarters
For Inspector General of Police,
Khyber Pakhtunkhwa

Handwritten signature and stamp:
Javed Ishaq Advocate (R.P.P.)
BC-10-4438
Distt: Kachera



(27)

OFFICE OF THE
SUPERINTENDENT OF POLICE
INVESTIGATION MARDAN
Phone No. 0937-9230121
Fax No. 0937-9230321

No. 1222 /E.C/Inv:

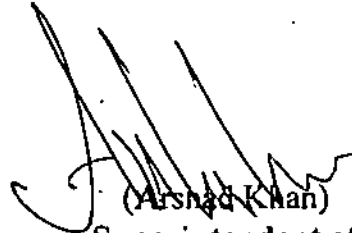
Dated 26 /04/2024.

To: The Regional Police Officer,
Mardan.

Subject: **REQUISITION.**

Memo:

It is submitted that Inspector Bashir Muhammad No. MR/31 OII PS Hoti is attending the age of superannuation on 30.05.2024. His 01 month service is remaining; in view of his experience and complimentary work in official duties his services are required to this wing as Acting DSP Investigation, please.


(Arshad Khan)
Superintendent of Police,
Investigation, Mardan.

Advised



28

Government of Khyber Pakhtunkhwa
Office of the Regional Police Officer,
Mardan
Phone No. 0937-9230113, Fax No. 0937-9230116
Email Address: - osp@policemardan.gov.pk

To The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. 1198 IES, dated Mardan Region, the 06/05/2024.

Subject: REQUISITION

Enclosed please find herewith an application submitted by Inspector Bahsir Muhammad No. MR/31 duly forwarded by Superintendent of Police Investigation Mardan vide his office Memo: No. 1000/EC/Inv., dated 26.04.2024, the same is sent for consideration, please.

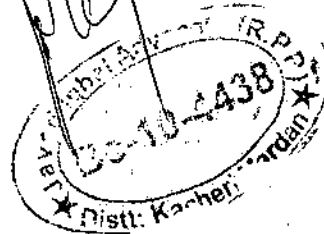
Encirs: As Above:

Najeeb
(Najeeb-Ur-Rehman Bugvi) PSP
Regional Police Officer.

Mardan
6/5/24

CC.

To the Superintendent of Police Investigation Mardan for information w/r to his office Memo: No. quoted above.





OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA

Dated, Peshawar the 09/05/2024

NOTIFICATION

No. CPO/E-I/Transfer/Posting/ 1315 In exercise of the powers conferred upon the Provincial Police Officer, Khyber Pakhtunkhwa under sub-section (4) of Section 17 of the Khyber Pakhtunkhwa Police Act, 2017, the following transfer/posting is hereby ordered in the public interest, with immediate effect: -

Name & Rank	From	To
Mr. Bashir Muhammad No. MR/31 Inspector (BS-16)	Inspector Mardan Region	At the disposal of RPO, Mardan Region for further posting as Acting DSP in his own pay & scale.

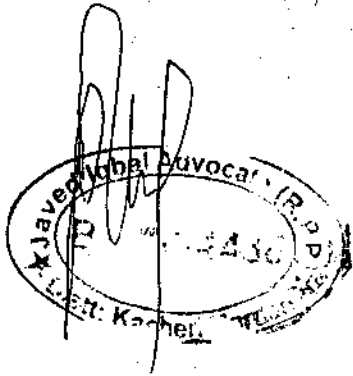
Sd/-
(AKHTAR HAYAT KHAN) PSP
PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA

No. & date given

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Addl: Inspector General of Police, HQrs: Khyber Pakhtunkhwa.
3. Deputy Inspector General of Police HQrs: Khyber Pakhtunkhwa.
4. Regional Police Officer, Mardan Region.
5. PSO to IGP Khyber Pakhtunkhwa.
6. Registrar CPO Peshawar.
7. Supdt: Secret & E-II CPO, Peshawar.
8. Officer concerned.
9. U.O.P File.

Attest



(RIZWAN MANZOOR) PSP
DIG/Headquarters
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

قیمت
50 روپے

39663



ایڈریس: چارسدہ اقبال

بار کونسل/ایسوسی ایشن نمبر: 1212

رابطہ نمبر: 79-111-9331

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: محترم قاضی صاحب سروس سٹریٹ

منجانب: سر محمد	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام کیلئے کو وکیل مقرر کیا گیا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائرہ عمل اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل باجزدی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو کوئی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا پختہ پروا ختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا بندہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



الرقوم:

الع بد

پشاور سروس سٹریٹ کے لیے منظور ہے

نوٹ: اس وکالت نامہ کارروائی ناقابل قبول ہوگی۔

