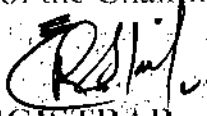


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** \_\_\_\_\_

**2049/2024**

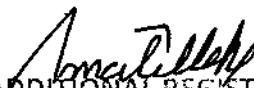
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/10/2024	<p>The appeal of Mr. Ghafir Ullah resubmitted today by Mr. Muhammad Usman Khan Turlandi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 25.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Ghafir Ullah received today i.e on 16.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no.4 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Check list is not attached with the appeal.
- 4- Affidavit is not attested by the Oath Commissioner.
- 5- Annexure-E of the appeal is illegible.
- 6- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent be submitted with the appeal.

No. 915 /Inst./2024/KPST,

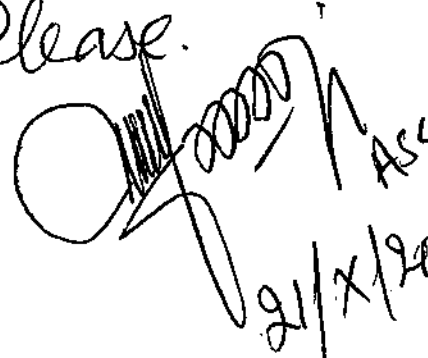
Dt. 16/10 /2024.

  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Dawood Khan Adv.  
High Court at Peshawar.

21-10-2024 R/sy,

Re-submitted after proper removal of all the objections raised/highlighted above with a request to kindly place it before the honorable SB for P-H Please.

  
ASC  
21/10/2024

**Before The Khyber Pakhtunkhwa Service Tribunal**

**P E S H A W A R.**

In ref: to Service Appeal No. 2048 /2024.

Sub-Inspector Ghafir Ullah.....**VERSUS**..... PPO & others.

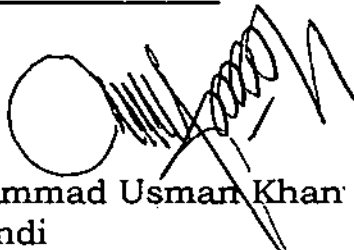
**I N D E X**

<b>S.No.</b>	<b>DESCRIPTION OF DOCUMENTS</b>	<b>ANNEX</b>	<b>PAGE</b>
1.	Check list/Index		A/B
2.	Main Service Appeal.	-----	01-07
3.	Affidavit.	-----	08
4.	Application for condonation of delay with Affidavit.	-----	09-10
5.	Copy of the result of Intermediate College Course.	"A"	11-14
6.	Copy of the order of promotion as Officiating ASI on Adhoc basis.	"B"	15-16
7.	Notification of promotion as Officiating Sub-Inspector dated 22-11-2013.	"C"	17-18
8.	Seniority list as stood on 06-12-2022.	"D"	19-23
9.	Copy of the original impugned order dated 15-03-2023, communicated to the appellant dated 30-05-2024	"E"	24-28
10.	Copy of the official letter dated 07-04-2023	"F"	29-32
11.	Copy of the departmental appeal supported by covering letter.	"G"	33-35
12.	Vokalatnama in original.		36

**APPELLANT.**

Through;

Dated 16/10/2024

  
Muhammad Usman Khan  
Turlandi  
Advocate Supreme Court NO. 5045  
CNIC No. 17301-1723606-3  
e-mail; [usmankhan@gmail.com](mailto:usmankhan@gmail.com)  
Mobile Contact; 0333-9153699.

Dawood Khan  
Advocate Peshawar.  
Mobile Contact; 0300-5895841

(1)

**Before The Khyber Pakhtunkhwa Service Tribunal**

**PESHAWAR.**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 16810

In ref: to Service Appeal No. 2049/2024.

Dated 16-10-2024

Ghafir Ullah No. P/130, Sub-Inspector Police, presently working and posted as In-charge Security; Bacha Khan University Palosa, Charsadda..... **APPELLANT**

**VERSUS**

- 1). The worthy Provincial Police Officer Khyber Pakhtunkhwa, Central Police Office (CPO) Peshawar.
- 2). The worthy Additional Inspector General of Police/HQrs: Khyber Pakhtunkhwa, Police Line Peshawar.
- 3). The worthy Regional Police Officer Mardan.
- 4). The District Police Officer Mardan..... **RESPONDENTS**

*Deleted to  
m/ASL*

**SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT. AGAINST THE ORIGINAL IMPUGNED ORDER BEARING NO. 147/E-II/legal DATED PESHAWAR the 15/03/2023, PASSED BY THE RESPONDENT NO. 1 ON THE BACK OF THE APPELLANT AND KEEPING HIM UNAWARE WHEREBY HE WAS DEMOTED FROM THE RANK OF INSPECTOR TO THE RANK OF SUB-INSPECTOR ON THE ALLEGED PLEA OF OUT OF TURN PROMOTION AS OFF; ASI DATED 30-06-2009 AND ON COMMUNICATION OF THE IMPUGNED ORDER DATED 30-05-2024, THE DEPARTMENTAL APPEAL BEFORE THE RESPONDENT No. 1 DATED 29-06-2024, FILED BY THE APPELLANT SEEKING HIS REINSTATEMENT, HAS NOT YET BEEN RESPONDED IN EITHER WAY DESPITE STIPULATED PERIOD HAS BEEN ELAPSED.**

**Before The Khyber Pakhtunkhwa Service Tribunal**

**PESHAWAR.**

In ref: to Service Appeal No. \_\_\_\_\_/2024.

Ghafir Ullah No. P/130, Sub-Inspector Police, presently working and posted as In-charge Security, Bacha Khan University Palosa, Charsadda..... **APPELLANT**

**VERSUS**

- 1). The worthy Provincial Police Officer Khyber Pakhtunkhwa, Central Police Office (CPO) Peshawar.
- 2). The worthy Additional Inspector General of Police/HQrs: Khyber Pakhtunkhwa, Police Line Peshawar.
- 3). The worthy Regional Police Officer Mardan... **RESPONDENTS**

**SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT. AGAINST THE ORIGINAL IMPUGNED ORDER BEARING NO. 147/E-II/legal DATED PESHAWAR the 15/03/2023, PASSED BY THE RESPONDENT NO. 1 ON THE BACK OF THE APPELLANT AND KEEPING HIM UNAWARE WHEREBY HE WAS DEMOTED FROM THE RANK OF INSPECTOR TO THE RANK OF SUB-INSPECTOR ON THE ALLEGED PLEA OF OUT OF TURN PROMOTION AS OFF; ASI DATED 30-06-2009 AND ON COMMUNICATION OF THE IMPUGNED ORDER DATED 30-05-2024, THE DEPARTMENTAL APPEAL BEFORE THE RESPONDENT No. 1 DATED 29-06-2024, FILED BY THE APPELLANT SEEKING HIS REINSTATEMENT, HAS NOT YET BEEN RESPONDED IN EITHER WAY DESPITE STIPULATED PERIOD HAS BEEN ELAPSED.**

**PRAYERS:-**

On acceptance of this service appeal the Respondents may please be directed to act in accordance with law and by setting-aside the impugned order of demotion to the rank of Sub-Inspector vide order dated 15-03-2023 passed by the respondent No. 1, the original post, status/Rank of the appellant, as Inspector with parent seniority by placing his name at S. # 466 in the seniority list of Inspector, maintained by the CPO Peshawar dated 06-12-2022 be restored and the appellant be reinstated with all back benefits and his grievances as such be redressed accordingly.

**Respectfully Sheweth;**

1. **That** as per chronological service history of the appellant, he was recruited as Constable on 30-01-1991 and his name was brought in promotion list A-I & B-I and in light of Standing Order No. 10/1987, qualified the Lower College Course from PTC Hangu vide Notification dated 08-05-1999.
2. **That** thereafter, the appellant qualified the Intermediate College Course in the term ending 30-11-2007 and as such, his name was figured at S. # 100 in the concerned result thereof. In the meanwhile, the appellant was transferred along-with his lien from Mardan region to CCP Peshawar whereas, on the strength of CCP Peshawar, the appellant was promoted *dated 30-06-2009* as Officiating ASI on Adhoc basis. (Copy of the result of Intermediate College Course & order of promotion as Officiating ASI on Adhoc basis is annexure "A" & "B" respectively.)
3. **That** the appellant and his "D" list batch-mates were simultaneously confirmed as ASI and were promoted to List "E" on 27-09-2011 by the CCPO Peshawar. Thereafter, vide Notification dated 22-11-2013; the appellant along-with his colleagues was promoted as Officiating Sub-Inspector. (Copy of

the Notification of promotion as Officiating Sub-Inspector dated 22-11-2013 is annexure "C".)

4. **That** by observing all the legal formalities/criteria laid down in Police Rule 13/18, required for confirmation, the appellant was subsequently confirmed in the rank of Sub-Inspector vide Notification dated 12-11-2015.
5. **That** in compliance of Police rule 13/15 and in light thereof, proper recommendations being brought on "Form 13-15" by the concerned worthy DPO, RPO and CCPO Peshawar, the name of the appellant was admitted to list "F" vide order passed by the respondent No. 2 dated 11-01-2019 and was promoted as Off: Inspector Police vide order dated 28-12-2020. The name of the appellant was placed at S. # 466 in the seniority list of Inspector, maintained by the CPO Peshawar dated 06-12-2022. (Copy of the Seniority list as stood on 06-12-2022 is annexure "D".)
6. **That** the appellant was greatly shocked and surprised to know about the impugned order of his demotion from the rank of Inspector to the rank of Sub-Inspector on the allegation of "**out of turn promotion**" allegedly got by the appellant to the post/rank of Off: ASI in Mardan region vide order dated 30-06-2009. {Copy of the original impugned order dated 15-03-2023, communicated to the appellant dated 30-05-2024 is annexure "E"}.
7. **That** the RPO Mardan/respondent No. 3 was pleased to ask all the concerned Policers Officers {Demoted/affectees} to submit application for the redressal of their grievance if any regarding their demotion and subsequent fixation of seniority if erroneously been done. Upon such representations submitted by the such aggrieved persons, a so-called Fact finding inquiry Committee was constituted who without going into the depth of the matter submitted their report in random and was forwarded to the respondent No. 1 vide official letter

dated 07-04-2023. (Copy of the official letter dated 07-04-2023 is annexure "F".)

8. That the appellant, while having no "out of turn promotion" against any post/rank throughout his service carrier and all of his promotion were duly accorded in accordance with law and Police rules and as per required qualification, experience & seniority, was aggrieved of the discrimination in service and while depriving him of his legal right, filed departmental appeal against the impugned order for the redressal of his grievances and tabled before the respondent No.1 vide covering letter dated 29-06-2024, duly forwarded by the respondent No. 4. (Copy of the departmental appeal supported by covering letter is annexure "G").

9. That the appellant was kept unaware regarding the impugned order which was passed on his back and no copy was delivered/endorsed or communicated to him.

10. That the respondent No. 1 did not bother to consider the grievances of the petitioner in either way while the appellant waited till the expiry of the stipulated period but his appeal has not yet been responded.

11. That in the given circumstances the appellant prefers this service appeal for the redressal of his grievances inter-alia on the following grounds:

**G R O U N D S.**

a) Because the Appellant has a proper recurring cause of action and is suffering from continuous legal injury and his grievances should have been redressed by the Appellate Authority and by not doing so, the original impugned order is illegal, unlawful, without lawful authority, without jurisdiction, against the law on the subject and against the norms of natural justice and liable to be declared as such.



- b) **Because** the allegation of "Out of turn Promotion" pertains to the year 2009 which is incorrect, false, vexatious and denied in entirety and if it is admitted even then proper inquiry should have been carried out, statements of the concerned official/Officers should have been recorded and the appellant should have been given a fair opportunity of hearing which legal formalities have never been observed, hence by no stretch of imagination the impugned order is maintainable and alternatively is liable to be set-aside.
- c) **Because** admittedly the appellant being legally qualified and deserving candidate was promoted as Off. ASI by the CPO Peshawar and that too, on Adhoc basis whereas definition clause of Civil Servants Act, 1973 provides that "adhoc appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment, pending recruitment in accordance with such method.
- d) **Because** the appellant was deserving and eligible candidate for his due periodic promotion to the rank of ASI, SI & Inspector who gained his due seniority while no adverse remarks whatsoever have ever been assigned to him and thus valuable right has been accrued to him and such rights could not be taken away in an arbitrary and fanciful manner.
- e) **Because** if the appellant, on the basis of any "Gallantry", has ever been bestowed upon with "Out of turn Promotion" then obviously he should have left his batch-mates behind him but in contrary, his confirmation in the rank of ASI & SI was made simultaneously with his colleagues.
- f) **Because** valuable right was accrued to the appellant whereas his fundamental valuable rights have been encroached by the respondents on their personal whims & wishes and such encroachment is hit by the command of the constitution of the Islamic Republic of Pakistan 1973.

6

- g) **Because** the Appellant has vested valuable right accrued to him and being a civil servant, terms & conditions of his services shall not be varied to his disadvantage and violation thereof would hit the command of constitution and such fundamental rights could not be taken away with a single stroke of pen.
- h) **Because** illegality, unconstitutionality and discrimination in service as observed by the respondents, floating from the surface of the record in the matter of demotion and subsequent fixation of seniority of the appellant is highly deplorable and condemnable, being unlawful, unconstitutional, without lawful authority, without jurisdiction, against the norms of natural justice and equity hence to be declared as such.
- i) **Because** the act of the respondents if seen with serious note, the same are also in clear disregard of Article 9 of the Constitution of the Islamic republic of Pakistan 1973 as the same are meant to deprive the appellant from his right to life as the life is mainly dependent on bread and butter which is earned by a person through rendering service.
- j) **Because** the act of the respondents are also violative of Articles 03, 04, 8, 09, 25 and 27 of the Constitution of the Islamic republic of Pakistan 1973.
- k) **Because** valuable right was accrued to the appellant whereas his fundamental valuable rights have been encroached by the respondents on their personal whims & wishes and such encroachment is hit by the command of the constitution of the Islamic Republic of Pakistan 1973.
- l) **Because** the respondents have transgressed their power and the appellant has been denied the fundamental rights of being treated fairly, justly and equally in accordance with law.

7


- m) **Because** there is no legal bar as to withdrawal of the impugned order & correction of seniority list of SI as stood on 06-12-2022 by placing his name at S. # 466 and this august Tribunal has the jurisdiction to adjudicate upon the matter.
- n) That further submission with the prior permission of this august Tribunal will be advanced at the time of hearing the appellant at the bar.

It is therefore, humbly prayed, that On acceptance of this service appeal the Respondents may please be directed to act in accordance with law and by setting-aside the impugned order of demotion to the rank of Sub-Inspector vide order dated 15-03-2023 passed by the respondent No. 1, the original post, status/Rank of the appellant as Inspector with parent seniority by placing his name at S. # 466 in the seniority list of Inspector, maintained by the CPO Peshawar dated 06-12-2022 be restored and the appellant be reinstated with all back benefits and his grievances as such be redressed accordingly.

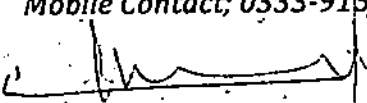
Any other remedy if available in the circumstances of the case, which has not specifically been asked and which is deemed fit and appropriate, may also be extended in favor of the appellant please.

  
**APPELLANT**

Through;

  
Muhammad Usman Khan  
Turlandi  
Advocate Supreme Court NO: 5045  
CNIC No. 17301-1723606-3  
e-mail; [usmankhan@gmail.com](mailto:usmankhan@gmail.com)  
Mobile Contact; 0333-9153699.

Dated 12/10/2024

  
Dawood Khan  
Advocate Peshawar  
Mobile Contact; 0300-5895841

6

**Before The Khyber Pakhtunkhwa Service Tribunal**

**PESHAWAR.**

In Ref; to S. Appeal No. \_\_\_\_\_ of 2024.

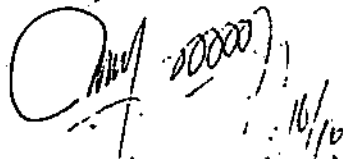
Sub-Inspector Ghafir Ullah..... **VERSUS**..... PPO & others

**AFFIDAVIT.**

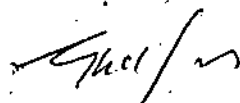
I, Ghafir Ullah No.103-P, Sub-Inspector Police presently working and posted as In-charge Security, Bacha Khan University Palosa, Charsadda, do hereby solemnly affirm and declare on oath that the contents of accompanying Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been kept secret or concealed therein from this august Tribunal.

**IDENTIFIED BY :**

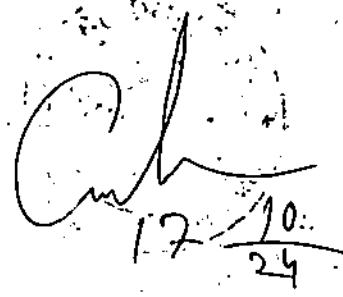
**DEPONENT**

  
16/10

**Muhammad Usman Khan  
Turlandi  
Advocate Peshawar**



Ghafir Ullah No.130-P  
(Appellant)

  
17/10/24

(9)

**Before The Khyber Pakhtunkhwa Service Tribunal**

**PESHAWAR.**

In ref: to Service Appeal No. \_\_\_\_\_/2024.

**Subject:- APPLICATION FOR CONDONATION OF DELAY.**

Respectfully Sheweth:

- 1) That the Appellant/Applicant has filed the accompanying service appeal before this august Tribunal today wherein no date of hearing has yet been fixed.
- 2) That the impugned order (Annexure "E") if seen at a glance, it has been issued on 15/03/2023 at Peshawar while it has been communicated/handed over to the Appellant/Applicant on 30/05/2024 at the office of DPO/respondent No. 4 at Charsadda.
- 3) That though, there is no delay in filing of the service appeal within the stipulated period provided for appeal from the date of communication of impugned order but if there is any delay in filing of the instant service Appeal, it has always been reckoned as only technicality which was often overlooked as riddle in the way of justice.
- 4) That there is no fault on part of the Appellant/Applicant but even then, if any delay is found, the same may not be considered as fatal to the fate of the appeal.
- 5) That further submissions will be advanced at the time of hearing the applicant at the bar.

It is, therefore, humbly prayed that on acceptance of this application the delay in filing the service Appeal if any, the same may graciously be condoned in the best interest of justice.

**APPLICANT.** 

Through;



Muhammad Usman Khan  
Turlandi

Advocate Supreme Court NO. 5045  
CNIC No. 17301-1723606-3  
e-mail; [usmankhan@gmail.com](mailto:usmankhan@gmail.com)  
Mobile Contact; 0333-9153699.

Dated 16/10/2024

Dawood Khan  
Advocate Peshawar.  
Mobile Contact; 0300-5895841

(10)

**Before The Khyber Pakhtunkhwa Service Tribunal**

**PESHAWAR.**

In Ref; to S. Appeal No. \_\_\_\_\_ of 2024.

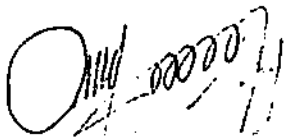
Sub-Inspector Ghafir Ullah.....**VERSUS**..... PPO & others

**AFFIDAVIT:**

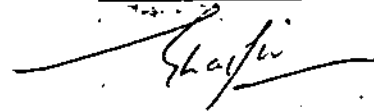
I, Ghafir Ullah No.103-P, Sub-Inspector Police presently working and posted as In-charge Security, Bacha Khan University Palosa, Charsadda (Appellant/Applicant), do hereby solemnly affirm and declare on oath that the contents of the accompanying Application for condonation of delay are true and correct to the best of my knowledge and belief and that nothing has been kept secret or concealed therein from this august Tribunal.

**IDENTIFIED BY :**

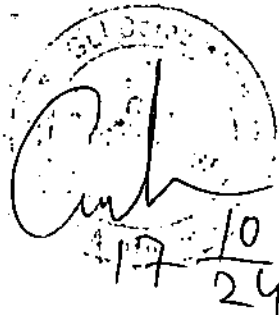
**DEPONENT**



**Muhammad Usman Khan  
Turlandi  
Advocate Supreme Court**



**Ghafir Ullah No.130-P  
(Appellant/Applicant)**



Annex - "A"

(11)



POLICE TRAINING COLLEGE HANGU  
ESTD. 1935.

POLICE DEPARTMENT

PTC HANGU

FOR PUBLICATION IN NWFP POLICE GAZETTE PART II ORDERS BY THE  
COMMANDANT, POLICE TRAINING COLLEGE HANGU.

NOTIFICATION

Dated 25/05/2008

Notification No. 263 IS/RESULT: Since the training period of Intermediate College Course has been reduced from Six to four months, by the Provincial Police Officer, P.W.P.P. Peshawar vide his office Memo No 13742-90/E-1 dated 19/06/2007, the following under training & re-appeared students of "Intermediate College Course" appeared in the final examination, held at PTC Hangu for the term ending 30<sup>th</sup> November, 2007 and have qualified to be declared as PASSED/Paied. They are hereby notified and their order of MERIT is noted against each their names.

S.No.	Comp#	Name	Bel#	District	Merit	Remarks
1	A3558	Fakhar Alam	29	Dir Upper	1	
2	A3561	Rahmatullah	1054	Kohat	2	
3	A3493	Atlas Khan	11	DIK	6	
4	A3492	Rafiqullah	123	PTC Hangu	7	
5	A3475	Khushal Khan	3513	CCP Pesh.	8	
6	A3478	Noor Haider	1163	CCP Pesh.	9	
7	A3516	Muhammad Alam	411	Nowshera	10	
8	A3577	Noor Aslam	84	Lakki	11	
9	A3479	Saeedullah	64	DIK	12	
<u>Re-appeared Ex term ending 20-03-05 &amp; qualified</u>						
10	A3900	Asghar Ali	751	Charsadda	13	
<u>Re-appeared Ex term ending 25-07-07 &amp; qualified</u>						
11	A3898	Mir Afzal	1170	Kohat	14	
12	A3896	Akhtar Khan	1095	Mardan	15	
13	A3895	Narmatullah	PTC	PTC	16	
14	A3891	Noor Muhammad	203	Lakki	17	
15	A3899	Ilyas Farid	339	Haripur	18	
<u>Term ending 30-11-2007 &amp; qualified</u>						
16	A3484	S Muazzam Shah	79	Chitral	19	
17	A3553	Habib Ullah	140	Charsadda	20	
<u>Re-appeared Ex term ending 25-07-07 &amp; qualified</u>						
18	A3897	Shafiullah	679	Kohat	21	
<u>Term ending 30-11-2007 &amp; qualified</u>						
19	A3574	Naqeebullah	265	Karak	22	
20	A3567	Fazal Rabbani	6254	Spl: DIK	23	
21	A3519	Muhammad Zeb	336	CCP Pesh.	24	
22	A3560	Muhammad Tabrez	636	Nowshera	25	
23	A3476	Habibullah	195	Bannu	26	
24	A3586	Jehanzeb	506	Kohistan	27	
25	A3540	Wajid Ali	1361	Mardan	28	
26	A3500	Sajjad Khan	732	Abbottabad	29	
27	A3559	Amanullah	730	DIK	30	

Attended  
by  
M/Asc

(12)

Sl. No.	Name	Roll No.	District	Merit	Remarks
<u>Re-appeared Ex. term ending 25-07-07 &amp; qualified</u>					
38	A3891	Reshullah Jan	118	Peshawar	31
<u>Term ending 30-11-2007 &amp; qualified</u>					
39	A3483	M. Hamayun	225	Mardan	32
40	A3481	Muhammad Saferi	14	Bannu	33
41	A3522	Muhammad Islam	1084	Dir Lower	34
42	A3482	Zahid Akhtar	776	Abbottabad	35
43	A3562	Hadayatullah	1806	CCP Pesh.	35
44	A3504	Ayaz Hussain	244	Hangu	36
45	A3521	Khurshed Zaman	520	Kohat	37
46	A3524	Dil Nawaz	233	Lakki	38
47	A3585	Muhammad Ayaz	1089	Swat	39
48	A3564	Hafeez U. Rahman	177	CPC Pesh.	40
49	A3566	Hashir Ahmad	258	Mardan	41
50	A3533	Khalid Nawaz	733	Bannu	42
<u>Re-appeared Ex. term ending 25-07-07 &amp; qualified</u>					
41	A3892	Ameer Muhammad	155	Tank	43
<u>Term ending 30-11-2007 &amp; qualified</u>					
42	A3536	Karam Hayat	937	Swat	44
<u>Re-appeared Ex. term ending 20-03-06 &amp; qualified</u>					
43	A3890	Muhammad Hayat	51	FRP Pesh:	45
<u>Term ending 30-11-2007 &amp; qualified</u>					
44	A3512	Noor Wali	750	FRP Kohat	46
45	A3581	Shahjee Hussain	896	Nowshera	47
46	A3573	Muhammad Yousaf	74	Manshra	48
47	A3584	Niazullah	3366	CCP Pesh:	49
48	A3570	Shamim Khan	213	Karak	50
49	A3511	Asghar Khan	965	Mardan	51
50	A3501	Muhammad Yasin	7	Kohat	51
51	A3531	M. Ishrat yar	2334	CCP Pesh:	52
52	A3515	Anwar Jan	90	Kohat	53
53	A3532	Umar Jan	900	Bannu	54
54	A3488	Muntazar Khan	424	Swabi	55
55	A3495	Shojat Khan	918	Charsadda	56
56	A3579	Sher Muhammad	477	Nowshera	57
57	A3569	Mehrab Ali	56	Tank	58
58	A3530	Fida Hussain	22	Manshra	59
59	A3480	Fazal Mabood	370	Mardan	60
60	A3571	Zubair Shah	964	Dir Lower	61
61	A3523	Khan Sher	321	Mardan	62
62	A3497	Abdur Rashid	242	Chitral	63
63	A3502	Zainullah	797	Bannu	64
<u>Re-appeared Ex. term ending 25-07-07 &amp; qualified</u>					
64	A3894	Syed Zaman	42	Peshawar	65
<u>Term ending 30-11-2007 &amp; qualified</u>					
65	A3525	Abdul Wali	6	CPC Pesh:	66
<u>Awarded grace marks &amp; qualified</u>					
66	A3565	Touqeer Ahmad	813	Abbottabad	67
67	A3549	Azhar Ali	368	Kohistan	68
68	A3578	Gul Nawaz	88	Abbottabad	69
69	A3505	Sirat Khan	194	Buner	70

Attested  
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13

No.	Camp	Name	Roll	District	Merit	Remarks
70	A3530	Shahid Ahmad	703	Swabi	71	
71	A3509	Yaqoob Khan	160	Lakki	72	
72	A3518	Muhammad Nawaz	2151	CCP Pesh.	73	
73	A3537	Abdul Lateef	62	Kotak	74	
74	A3491	Muhammad Atsar	118	Shangla	75	
75	A3534	Hidayat Ullah	2137	CCP Pesh.	76	
76	A3543	Ihsanullah	65	Charsadda	77	
77	A3580	Mohabat Ali	240	Hangu	78	
78	A3474	Abdul Akbar	934	Mardan	79	
79	A3568	Niaz Ali	145	CCP Pesh.	80	
80	A3507	Murad Ali	72	Charsadda	81	
81	A3485	Amir Rangzeb	222	Huner	82	
82	A3494	Mikhat Ali	501	Swabi	83	
83	A3499	Ihsanullah	47	Chitral	84	
84	A3542	Jamshid Ali	782	Bannu	85	
85	A3503	Muhammad Ibrar	88	Dir Lower	86	
86	A3545	Nazeer Muhammad	52	Haripur	87	
87	A3548	Muntaz Khan	77	Pte	88	
88	A3541	Muhammad Qambar	752	Hangu	89	
89	A3575	Inayatullah	1176	Bannu	90	
90	A3529	Ameer Nawab	242	CCP Pesh. CPC	91	

Re-appeared Ex term ending 20-03-07 & qualified

91	A3589	Muhammad Riaz	889	Bannu	92	
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Term ending 30-11-2007 & qualified

92	A3496	Zulfiqar Ali	297	Kohistan	93	
93	A3498	Shoukat Pervez	980	DIK	94	
94	A3547	Sher Akbar	131	Pte/Rtw	95	
95	A3557	Zamin Khan	39	Dir Upper	96	
96	A3489	Muhammad Riaz	809	CCP Pesh.	97	
97	A3556	M- Darwaish	491	Dir Upper	98	
98	A3506	Pervez Gul	262	Mardan	99	
99	A3513	Hameed Iqbal	884	Swat	100	
100	A3555	Ghafir Ullah	691	Charsadda	101	
101	A3538	Ghaffar Ali	862	Charsadda	102	
102	A3517	Muhammad Jan	1027	DIK	103	
103	A3527	Muhammad Islam	322	Swat	104	
104	A3563	Zahoor Ahmad	75	Batgram	105	
105	A3487	Jamalullah	419	Mardan	106	
106	A3576	Jan Badshah	485	Swat	107	
107	A3550	Sher Nawaz	127	Lakki Marwat	108	
108	A3526	Shams U Zaman	549	Swabi	109	
109	A3477	Farakh Zada	1225	CCP Pesh.	110	
110	A3546	Sabz Ali	886	CCP Pesh.	111	
111	A3554	S- Abid Shah	2333/1747	CCP Pesh.	112	
112	A3583	Muhammad Irfan	118	Haripu	113	
113	A3551	Muslim Gul	613	Swabi	114	
114	A3510	Naimatullah	1170	Bannu	115	
115	A3514	Asif Khan	193	Haripur	116	
116	A3582	Asmatullah	1034	CCP Pesh.	117	
117	A3535	Faqeer Shah	1575	CCP Pesh.	118	
118	A3490	Fazal Subhan	587	Dir Lower	119	
119	A3508	Muhammad Din	668	DIK		Failed in I
120	A3552	Sabir Shah	1606	CCP Pesh.		" " " "
121	A3528	Ihsanullah	534	DIK		" " " "
122	A3520	Malook Jan	3491	CCP Pesh.		" FPPPW
123	A3572	Aurangzeb	657	Kohat		" PPC/M


Attended  
to  
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(14)

S No	Comp#	Name	Usln#	District	Merit	Remarks
124	A3486	Mir Ghaffar	794	DIK		All law & all drill subjects P/R/M/N/D/R/F
125	A3544	Badshah Syeed	966	Swat		

**Note:**

Only eight willing candidates contested for first position in the cadetship exams in accordance with the provisions of Standing Order No 01 of 2004, issued by the Commandant PTC Hangu; candidates at S.No 01 to 02 are placed at merit No 01 and 02 respectively, as they have obtained 70 or above percent marks in over all subjects. While candidates at S.No 03 and downward are placed at merit No.06 and below, as they have obtained less than 70% marks in overall subjects. Therefore candidates at merit No.06 and below will not claim any benefit, as provided in Standing order No 07 of 2003 & 11 of 1987 read with the validation of Standing order Act 2005 (NWFP Act No 4 of 2005).

  
Commandant  
Police Training College Hangu.


No 264-98

/S. Dated Hangu, the

2008.

Copy of above is submitted for information and necessary action to:

1. The Provincial Police Officer, N.W.F.P. Peshawar.
2. The Addl IGP Investigation NWFP for publication in Police Gazette Part II.
3. The DIsG of Police Hazara, Mardan, Malakand, Kohat, Bannu & DIK Regions.
4. The Capital City Police Officer Peshawar.
5. The Commandant FRP Peshawar.
6. The Director CPC Peshawar.
7. The DPO's Districts Abbottabad, Bagram, Bannu, Buner, Charsadda, Chitral, DIK, Dir/L, Dir/U, Hangu, Haripur, Karak, Kohat, Kohistan, Lakki, Mansehra, Mardan, Nowshera, Swabi, Shagla, Swat and Tank.
8. The SP FRP/Spl. Kohat & DIK.
9. The Dy. Commandant PTC Hangu.

  
Commandant,  
Police Training College Hangu.

Attested  
by  
M/Asst

~~ABDUL WAHEED NIAZ (M.A.M.A.I)~~  
 197

10/10/76  
 10/10/76

1. SI Mr. Ehsan, Sub-Station of Durrani Division promoted to the rank of SI Mr. Ehsan, Sub-Station of Durrani Division.
2. ASI Agha Saif of Karama District promoted to the rank of ASI Agha Saif, Sub-Station of Durrani Division.
3. ASI Muhammad Farooq of Karama District promoted to the rank of ASI Muhammad Farooq, Sub-Station of Durrani Division.
4. Head Constable Khuda Bakhsh of Durrani District promoted to the rank of Head Constable Khuda Bakhsh, Sub-Station of Durrani Division.
5. Head Constable Ehtisham Khan of Durrani District promoted to the rank of Head Constable Ehtisham Khan, Sub-Station of Durrani Division.
6. Mr. Munir Shah, No. 42 of C-1, Durrani District promoted to the rank of Mr. Munir Shah, Sub-Station of Durrani Division.
7. Mr. Muhammad Yousaf No. 25 of Durrani District promoted to the rank of Mr. Muhammad Yousaf, Sub-Station of Durrani Division.
8. Constable Inayat Khan No. 133 of Durrani District promoted to the rank of Constable Inayat Khan, Sub-Station of Durrani Division.
9. Constable Aftab Khan No. 667 & Nadeem Khan of Durrani District promoted to the rank of Constable Aftab Khan, Sub-Station of Durrani Division.
10. Constable Muhammad Farooq of Durrani District promoted to the rank of Constable Muhammad Farooq, Sub-Station of Durrani Division.
11. Constable (Junior) Method No. 456 of Karama District recommended for promotion to the rank of Constable (Junior) Method No. 456 of Karama District.
12. Constable Head Constable.

deceding, then with their own ranks by the Durrani Division.

Please direct them to the rank of (SI) Mr. Ehsan, Sub-Station of Durrani Division.

No. Durrani Division.

**ACCELERATED PROMOTION**

No. 15989-16000  
 29/6

No.	Name	Rank	Division
1	SI Mr. Ehsan	SI	Durrani
2	ASI Agha Saif	ASI	Durrani
3	ASI Muhammad Farooq	ASI	Durrani
4	Head Constable Khuda Bakhsh	Head Constable	Durrani
5	Head Constable Ehtisham Khan	Head Constable	Durrani
6	Mr. Munir Shah	Mr.	Durrani
7	Mr. Muhammad Yousaf	Mr.	Durrani
8	Constable Inayat Khan	Constable	Durrani
9	Constable Aftab Khan	Constable	Durrani
10	Constable Muhammad Farooq	Constable	Durrani
11	Constable (Junior) Method	Constable	Karama

Annex - B

(15)

(16)

**BETTER/LEGIBLE COPY**

From The Provincial Police Officer  
NWFP Peshawar.

To, The Capital City Police Officer,  
Peshawar.

The Deputy Inspector General of Police,  
Mardan Region.

The Deputy Inspector General of Police,  
Hazara Region.

The Deputy Inspector General of Police,  
Kohat Region.

The Deputy Inspector General of Police,  
Malakand Region.

The District Police Officer, Bunir, Kohistan, Haripur,  
Mardan, Batagram, Charsadda & Kohat.

No. 15989-16000/E-II, dated Peshawar the 29-06-2009

Subject: **ACCELERATED PROMOTION**

Memo:

The following officers have been granted accelerated promotion under Standing Order No. 6/2008 on ad hoc basis.

The worthy PPO NWFP Peshawar has desired to give them their new ranks personally.

Please direct them to come to CPO Peshawar on 30-06-2009 (Tuesday) at 1200 hrs for decorating them with their new ranks by the PPO NWFP, Peshawar.

1. SI Mir Hakam Fhah of Bunir District promoted to the rank of Offg: Inspector on ad hoc basis.
2. ASI Aqibat Shah of Kohistan District promoted to the rank of Offg: SI on ad hoc basis.
3. ASI Muhammad Javed of Kohistan District promoted to the rank of Offg: SI on ad hoc basis.
4. Head Constable Khurshaid Ahmad of Haripur District promoted to the rank of Offg: ASI on ad hoc basis.
5. Head Constable Ghafir Ullah of Mardan Region promoted to the rank of Offg: ASI on ad hoc basis.
6. HC Mutahir Shah No. 402 of Batagram District promoted to the rank of Offg: ASI on ad hoc basis.
- 7.
- 8.
- 9.
- 10.
- 11.

*Attested  
to  
HW-2009*

Sd/-

(Abdul Majeed Marwat):PSP  
Add: IGP/HQrs  
for Provincial Police Officer  
NWFP, Peshawar.

(17)

Annex - "C"

POLICE DEPARTMENT

CCP, PESHAWAR.

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II  
ORDERS BY THE CAPITAL CITY POLICE OFFICER, PESHAWAR.

**NOTIFICATION.**

Dated Peshawar the 22 / 11 / 2013.

**PROMOTION TO THE RANK OF OFFG; SIS:-** As per  
minutes of Departmental Promotion Committee meeting was held on  
12-11-2013. The orders of "EC" list 15th of Capital City Police Peshawar are hereby  
announced to the rank of offg; SIS with their colleagues already promoted vide  
notification No. 1835-1-18305/EC-I, dated 12-11-2013:-

S.NO	RANK, NAME & NUMBER	PRESENT POSTING
1.	Asst. Ghulam Ullah No. 1073/P	CCP, Peshawar
2.	Asst. Waqar Shah No. 32/P	CCP, Peshawar

*[Signature]*  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

1835-1-18305-73  
/EC-I, dated Peshawar the / / 2013.

Copy of above is forwarded for information and necessary action to

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Addl. Inspector, General of Police Investigation, Khyber Pakhtunkhwa, Peshawar with two spare copies of notification for publication in KPK, Police gazette part-II.
3. SSP/Operations, Peshawar.
4. SSP/Investigation, Peshawar.
5. SSP/Traffic Peshawar.
6. EC-II, PO, AS, CC & Computer Cell.

*Attended to by AK*

(18)

**BETTER/LEGIBLE COPY**

POLICE DEPARTMENT

CCP, PESHAWAR

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETT. PART-II  
ORDER BY THE CAPITAL CITY POLICE OFFICER, PESHAWAR.

**NOTIFICATION**

Dated Peshawar the, 22/11/2013

No. 18763/ EC-I: PROMOTION TO THE RANK OF OFFG; Sis:- As per recommendation of Departmental Promotion Committee meeting was held on 03-10-2013 the following "E" list ASIs of Capital City Police Peshawar are hereby promoted to the rank of Offg: Sis with their colleagues already promoted vide Notification No. 18491/EC-I, dated 12-11-2013:-

S.No.	RANK, NAME & NUMBER	PRESENT POSTING
1.	ASI Ghafir Ullah No. 1073/P	CCP, Peshawar
2.	ASI Wariq Shah No. 32/P	CCP, Peshawar

Sd/-

CAPITAL CITY POLICE OFFICER  
PESHAWAR

No. 18764-73/EC-I, dated Peshawar the \_\_\_/\_\_\_/2013

Copy of the above is forwarded for information and necessary action to the:-

1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
- 2.
- 3.
- 4.
- 5.
- 6.

Attended  
to  
hw

Annex-D

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08/02/2022  
P.D. 222-0

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**FINAL REVISED SENIORITY LIST OF INSPECTORS OF KHYBER PAKHTUNKHWA POLICE.**

The revised seniority list of Inspectors for the year 2022 as stood on 06/12/2022 is issued for all concerned

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
1	Dashir Ahmad No. 223 M	Swat	10/01/1967	17/10/2002	17/10/2004	13/08/2013	31/10/2013	31/10/2015	
2	Saira Saleh No. P 14	Peshawar	06/04/1975	01/01/2004	01/01/2006	11/01/2019	22/10/2019		
3	Muhammad Iqbal No. K 10	Peshawar	02/02/1964	01/09/2004	01/09/2006	30/01/2013	30/01/2013	19/10/2015	
4	Adil Abdal No. P 201	Peshawar	26/07/1977	22/11/2004	22/11/2006	11/08/2013	31/10/2013	31/10/2015	
5	Muhammad Iqbal No. MR 40	Mardan	02/04/1968		05/11/2014	05/11/2014	05/11/2016		
6	Liaqat Khan No. H 54	Harpur	10/04/1971	20/05/2005	20/05/2007	13/08/2013	31/10/2013	31/10/2015	
7	Bahar Ali No. MR 85	Mardan	25/09/1981	21/11/2007	24/11/2009	13/08/2013	31/10/2013	31/10/2015	
8	Hasder Ali No. MR 91	Charsadda	04/10/1983	21/11/2007	24/11/2009	13/08/2013	31/10/2013	31/10/2015	
9	Atra Muhammad No. MR 93	Mardan	10/10/1983	21/11/2007	24/11/2009	11/02/2014	11/02/2014	11/02/2016	
10	Umar Gul No. MR 50	MKD Agency	11/02/1970	24/11/2007	24/11/2009	05/11/2014	05/11/2014	05/11/2016	
11	Razeeq Khan No. H 01	Abbottabad	09/09/1964	08/04/2008	08/04/2010	12/08/2015	12/08/2015	12/08/2017	
12	Hastam Khan No. P 226	Karak	12/01/1970	21/04/2008	21/04/2010	11/02/2014	11/02/2014	11/02/2016	
13	Javed Khan No. P 215	Peshawar	15/07/1969	21/04/2008	21/04/2010	11/02/2014	11/02/2014	11/02/2016	
14	Muhammad Hanif No. P 216	Peshawar	07/10/1963	21/04/2008	21/04/2010	11/02/2014	11/02/2014	11/02/2016	
15	Ihsan Ullah No. P 358	Peshawar	21/12/1968	21/04/2008	21/04/2010	19/07/2016	12/12/2018		
16	Badshah Khan No. P 204	Peshawar	04/10/1969	21/04/2008	21/04/2010	13/08/2013	31/10/2013	31/10/2015	
17	Ibad ur Rehman No. P 254	Charsadda	20/02/1965	21/04/2008	21/04/2010	05/11/2014	05/11/2014	05/11/2016	
18	Darwish Khan No. P 24	Peshawar	10/09/1968	21/04/2008	21/04/2010	10/05/2017	12/12/2018		
19	Kausar Khan No. MR 21	Charsadda	01/04/1968	16/06/2008	16/06/2010	05/11/2014	05/11/2014	05/11/2016	
20	Waqar Ahmad B 64	Hanna	20/09/1979	04/07/2008	04/07/2010	05/11/2014	05/11/2014	05/11/2016	
21	Fazal Miraj No. MR 124	Swabi	12/12/1964	26/08/2008	26/08/2010	19/07/2016	12/12/2018		
22	Muhammad Farq No. K 75	Kohat	07/01/1966	17/09/2008	17/09/2010	11/02/2014	11/02/2014	11/02/2016	
23	Umar Daraz Khan No. SI MR	Swabi	19/02/1966	10/12/2008	10/12/2010	10/12/2010	12/12/2018		
24	Ataullah No. D 18	D.I. Khan	04/08/1974	20/06/2009	20/06/2011	13/08/2013	31/10/2013	31/10/2015	
25	Khalid Mehmood No. D 19	D.I. Khan	15/06/1971	03/08/2009	03/08/2011	11/10/2013	11/10/2013	11/10/2015	
26	Qazi Asmat Ullah No. MR 96	Mardan	08/05/1970	11/08/2009	11/08/2011	11/02/2014	11/02/2014	11/02/2016	
27	Akbar Ali No. 204 MR	Mardan	07/10/1964	11/08/2009	11/08/2011	13/03/2017	10/05/2018	10/05/2020	
28	Habib Ullah Khan No. SI 168	Dur Lower	14/04/1973	19/08/2009	19/08/2011	30/01/2013	30/01/2013	19/10/2015	
29	Nahid Bakht No. 324 M	Dur Lower	03/04/1975	19/08/2009	19/08/2011	13/08/2013	31/10/2013	31/10/2015	
30	Taufiq Khan	Abbottabad	08/10/1964	10/05/2008	03/11/2011	11/02/2014	11/02/2014	11/02/2016	

Handwritten initials and date: 05/12/22

REVISED SENIORITY LIST OF INSPECTORS OF KHYBER PAKHTUNKHWA POLICE

Attached to HW/BS

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
459	Faiz Ullah No. P/121	Peshawar	21.02.1971	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
460	Ikhitar Ali No. P/66	Peshawar	12.10.1966	12.11.2013	12.11.2015	10.05.2017	10.05.2018	10.05.2020	
461	Nasrullah Khan No P/67	Peshawar	20.05.1968	12.11.2013	12.11.2015	10.05.2017	12.12.2018		
462	Mian Mohib Jan No. P/124	Charsadda	06.09.1969	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
463	Khushal Khan No P/68	Peshawar	05.07.1968	12.11.2013	12.11.2015	10.05.2017	10.05.2018	10.05.2020	
464	Noor Haider No. P/70	Peshawar	12.08.1967	12.11.2013	12.11.2015	10.05.2017	10.05.2018	10.05.2020	
465	Amir Nawab No. P/129	Mardan	10.01.1977	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
466	Ghaffar Ullah No. P/130	Charsadda	02.02.1972	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
467	Farukh Zada No. P/135	Peshawar	03.04.1966	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
468	Lamar Shah No. P/144	Charsadda	01.04.1970	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
469	Syed Sardar Ali Shah No P/157	Charsadda	20.11.1970	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
470	Akhtar Hussain No. P/163	Peshawar	10.08.1971	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
471	Sehan Ali No. P/247	Charsadda	31.03.1971	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
472	Ijaz Nabi No. P/406	Charsadda	30.11.1988	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
473	Hafeez-ur-Rehman No. P/391	Nowshera	10.10.1978	12.11.2013	12.11.2015	19.07.2016	10.05.2018	10.05.2020	
474	Syed Khalid Shah No. P/298	Peshawar	02.03.1974	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
475	Irfan No. P/299	Peshawar	02.01.1978	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
476	Nasem Haider Khan No. P/300	Peshawar	25.02.1986	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
477	Akhtar Naseer No. P/392	Nowshera	10.02.1978	12.11.2013	12.11.2015	19.07.2016	10.05.2018	10.05.2020	
478	Imran Alam No. P/315	Peshawar	19.08.1983	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
479	Inam Ullah No. P/62	Nowshera	06.08.1980	12.11.2013	12.11.2015	10.05.2017	10.05.2018	10.05.2020	
480	Ahmad Rashid No. P/336	Peshawar	11.08.1986	12.11.2013	12.11.2015	14.02.2020	28.12.2020		
181	Muhammad Abid Afridi No. P/337	Khyber Agency	01.01.1984	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
482	Shakir Ullah No. P/340	Peshawar	20.02.1984	12.11.2013	12.11.2015	11.01.2019	28.12.2020		
483	Muhammad Asim No. P/63	Nowshera	05.08.1987	12.11.2013	12.11.2015	10.05.2017	10.05.2018	10.05.2020	
484	Imran Ullah No. B/01	Bannu	07.02.1983	27.11.2013	27.11.2015	11.01.2019	16.04.2020		
485	Ehsan Ullah No. B/5	Bannu	02.02.1980	27.11.2013	27.11.2015	11.01.2019	16.04.2020		
486	Sajid Nawaz No. H/151	Battagram	30.09.1984	09.12.2013	09.12.2015	19.07.2016	10.05.2018	10.05.2020	
487	Muhammad Javed No. H/152	Abbottabad	15.04.1976	09.12.2013	09.12.2015	19.07.2016	12.12.2018		
488	Muhammad Arif No. H/153	Haripur	31.03.1981	09.12.2013	09.12.2015	19.07.2016	12.12.2018		
489	Majid Naseem No. H/111	Manshera	13.03.1977	09.12.2013	09.12.2015	13.03.2017	16.04.2020		
490	Farukh Sair No. 189/M	Buner	04.05.1986	10.12.2013	10.12.2015	19.07.2016	23.02.2017	23.02.2019	
491	Ghani-ur-Rehman No. 157/M	MKD Agency	01.03.1974	10.12.2013	10.12.2015	13.03.2017	10.05.2018	10.05.2020	
492	Sherin Zada No. 212/M	Dir upper	04.01.1967	10.12.2013	10.12.2015	13.03.2017	22.10.2019		
493	Rahim Khan No. 622/M	Swat	01.01.1967	10.12.2013	10.12.2015	13.03.2017	16.04.2020		

REVISED SENIORITY LIST OF INSPECTORS OF NUMBER PAKISTAN 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 Lst "F"	D.O Promotion as Offg: Inspector	D.O CONF: as Inspector	Remarks
494.	Younas Rahman No. 674/M	Dir lower	01.03.1974	10.12.2013	10.12.2013	13.03.2017	16.04.2020		
495.	Sulqat Khan No. 437/M	Swat	08.03.1968	10.12.2013	10.12.2013	11.01.2019	28.12.2020		
496.	Nowsherwan No. 167/M	Buner	15.03.1972	10.12.2013	10.12.2013	19.07.2016	12.12.2018		
497.	Gul Zamin No. 159/M	Dir lower	19.03.1973	10.12.2013	10.12.2013	13.03.2017	22.10.2019		
498.	Muhammad Tauheed No. 111/M	Dir lower	01.03.1978	10.12.2013	10.12.2013	13.03.2017	22.10.2019		
499.	Imran Khan No. 113/M	Dir lower	10.03.1982	10.12.2013	10.12.2013	13.03.2017	22.10.2019		
500.	Javed Iqbal No. 147/M	Dir upper	28.04.1979	10.12.2013	10.12.2013	13.03.2017	12.12.2018		
501.	Bakht Zada No. 94/M	Shangla	09.04.1981	10.12.2013	10.12.2013	13.03.2017	22.10.2019		
502.	Itabib Said No. 163/M	Swat	04.04.1981	10.12.2013	10.12.2013	13.03.2017	12.12.2018		
503.	Havzar Ali Shah No. 153/M	Shangla	01.09.1982	10.12.2013	10.12.2013	13.03.2017	22.10.2019		
504.	Imran Khan No. 119/M	Dir upper	23.03.1984	10.12.2013	10.12.2013	11.01.2019	28.12.2020		
505.	Aziz ur Rahman No. 72/M	Swat	15.06.1975	10.12.2013	10.12.2013	11.01.2019	28.12.2020		
506.	Mian Said Jamal No. 53/M	Swat	14.02.1973	10.12.2013	10.12.2013	13.03.2017	22.10.2019		
507.	Ijaz Ahmad No. 73/M	Swat	30.04.1977	10.12.2013	10.12.2013	13.03.2017	12.12.2018		
508.	Amir Sultan No. K/76	Karak	25.05.1964	18.12.2013	18.12.2013	22.09.2016	12.12.2018		
509.	Riaz Ali Shah No. P/291	Peshawar	25.04.1972	24.12.2013	24.12.2013	11.01.2019	28.12.2020		
510.	Khalid Anwar No. P/34	Peshawar	02.09.1984	24.12.2013	24.12.2013	11.01.2019	28.12.2020		
511.	Shahjee Hussain No. P/136	Nowshera	14.10.1966	24.12.2013	24.12.2013	11.01.2019	28.12.2020		
512.	Sajjad Ahmad No. P/407	Peshawar	01.03.1980	24.12.2013	24.12.2013	11.01.2019	28.12.2020		
513.	Imrad Ali No. MR/129	Mardan	13.04.1967	26.03.2014	26.03.2016	19.07.2016	10.05.2018	10.05.2020	
514.	Ahmad Ali No. MR/132	Swabi	01.04.1970	26.03.2014	26.03.2016	19.07.2016	12.12.2018		
515.	Sultan Mehmood No. MR/130	Swabi	01.01.1969	26.03.2014	26.03.2016	19.07.2016	22.10.2019		
516.	Raza Khan No. MR/131	Swabi	18.12.1969	26.03.2014	26.03.2016	19.07.2016	12.12.2018		
517.	Zahid Ali No. MR/134	Swabi	15.02.1966	26.03.2014	26.03.2016	30.09.2016	28.12.2020		
518.	Itabib Khan No. MR/141	Swabi	01.03.1970	26.03.2014	26.03.2016	30.09.2016	12.12.2018		
519.	Sher Nawas Khan No. 137/MR	Mardan	05.04.1965	26.03.2014	26.03.2016	13.03.2017	12.12.2018		
520.	Bashir Ahmad No. 237/MR	Mardan	06.10.1971	26.03.2014	26.03.2016	13.03.2017	12.12.2018		
521.	Atta-ur-Rehman No. 195/MR	Mardan	10.04.1965	26.03.2014	26.03.2016	13.03.2017	12.12.2018		
522.	Abdul Sajid No. 06/MR	Swabi	17.12.1969	26.03.2014	26.03.2016	13.03.2017	10.05.2018	10.05.2020	
523.	Sajjad Ali No. 32/MR	Swabi	01.01.1966	26.03.2014	26.03.2016	13.03.2017	12.12.2018		
524.	Ashiq Hussain No. 92/MR	Mardan	20.02.1971	26.03.2014	26.03.2016	13.03.2017	12.12.2018		
525.	Namir Khan No. 195/MR	Swabi	09.03.1967	26.03.2014	26.03.2016	13.03.2017	12.12.2018		
526.	Fala Muhammad No. MR/209	Mardan	02.01.1964	26.03.2014	26.03.2016	11.01.2019	16.04.2020		
527.	Abdul Waheed No. H/112	Haripur	15.03.1982	03.04.2014	03.04.2016	13.03.2017	12.12.2018		
528.	Muhammad Sajjad No. H/117	Manshra	06.01.1982	03.04.2014	03.04.2016	13.03.2017	12.12.2018		
529.	Muhammad Javed No. H/138	Abbottabad	20.04.1971	03.04.2014	03.04.2016	13.03.2017	12.12.2018		

REVISID SENIORITY LIST OF INSPECTORS OF KHAFER PAKHIL (KNDWA) POLICE

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 Ldt "F"	D.O Promotion as (Offg: Inspector	D.O CONF: as Inspector	Remarks
530.	Khan Afzar No. II/139	Mamohra	06.10.1983	03.04.2014	03.04.2016	13.03.2017	12.12.2018		
531.	Naveed Ahmed No. II/140	Mamohra	10.05.1977	03.04.2014	03.04.2016	13.03.2017	12.12.2018		
532.	Gohar Wakeel No. II/154	Kohistan	01.02.1980	03.04.2014	03.04.2016	13.03.2017	12.12.2018		
533.	Saeed-ur-Rehman No. II/155	Kohistan	08.01.1983	03.04.2014	03.04.2016	13.03.2017	12.12.2018		
534.	Muhammad Saeed No. II/156	Mamohra	12.01.1979	03.04.2014	03.04.2016	13.03.2017	22.10.2019		
535.	Abdul Rehman No. K/149	Karak	20.03.1963	09.04.2014	09.04.2016	22.09.2016	12.12.2018		
536.	Razi Gul No. K/07	Kohat	04.04.1968	09.04.2014	09.04.2016	22.09.2016	10.05.2018	10.05.2020	
537.	Dust Muhammad No. K/154	Karak	08.12.1969	09.04.2014	09.04.2016	22.09.2016	12.12.2018		
538.	Kirman Ali No. K/156	Kohat	11.03.1963	09.04.2014	09.04.2016	22.09.2016	12.12.2018		
539.	Gul Shah Haraz No. K/162	Kohat	12.07.1964	09.04.2014	09.04.2016	22.09.2016	12.12.2018		
540.	Habib Ur Rehman No. K/166	Kohat	03.07.1965	09.04.2014	09.04.2016	22.09.2016	10.05.2018	10.05.2020	
541.	Javed Hussain No. K/170	Kohat	04.03.1966	09.04.2014	09.04.2016	22.09.2016	12.12.2018		
542.	Gul Sher No. P/50	Peshawar	05.08.1986	16.04.2014	16.04.2016	10.05.2017	10.05.2018	10.05.2020	
543.	Sajawal No. P.97	Peshawar	18.07.1970	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
544.	Karim Dad No. P.98	Mardan	08.02.1967	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
545.	Zardad Ali No. P/53	Nowshera	01.04.1972	16.04.2014	16.04.2016	10.05.2017	22.10.2019		
546.	Ismahil No. P/101	Charsadda	25.03.1970	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
547.	Malik Taj No. P/55	Mardan	01.01.1970	16.04.2014	16.04.2016	10.05.2017	10.05.2018		
548.	Muhammad Ishaq No. P/102	Peshawar	01.10.1965	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
549.	Muhammad Riaz No. P/103	Peshawar	18.04.1968	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
550.	Ghulam Ali No. P/104	Peshawar	01.02.1964	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
551.	Muhammad Nazir No. P/106	Peshawar	15.04.1966	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
552.	Yousaf Ali No. P/107	Charsadda	30.12.1969	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
553.	Muhammad Taysab No. P/81	Peshawar	01.04.1970	16.04.2014	16.04.2016	10.05.2017	12.12.2018		
554.	Fazal Diyan No. P/110	Charsadda	15.04.1973	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
555.	Shakir Ullah No. P/57	Charsadda	06.04.1969	16.04.2014	16.04.2016	10.05.2017	22.10.2019		
556.	Wilayat Khan No. P/46	Charsadda	04.03.1973	16.04.2014	16.04.2016	10.05.2017	22.10.2019		
557.	Fazli Rokhan No. P/113	Charsadda	10.03.1968	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
558.	Mokaram Shah No. P/59	Charsadda	15.12.1970	16.04.2014	16.04.2016	10.05.2017	16.04.2020		
559.	Tilawat Shah No. P/116	Charsadda	25.09.1970	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
560.	Munir Khan No. P/64	Charsadda	20.09.1969	16.04.2014	16.04.2016	10.05.2017	10.05.2018	10.05.2020	
561.	Fazh Elahi No. P/123	Nowshera	15.12.1966	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
562.	Muhammad Fabreez No. P/127	Nowshera	21.12.1972	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
563.	Sher Muhammad No. P/128	Mardan	12.02.1972	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
564.	Ghaffar Ali No. P/133	Mardan	20.09.1970	16.04.2014	16.04.2016	11.01.2019	28.12.2020		
565.	Gul Dad Khan No. P/141	Peshawar	02.05.1971	16.04.2014	16.04.2016	11.01.2019	28.12.2020		

REVISED SENIORITY LIST OF INSPECTORS OF KHYBER PAKHTUNKHWA POLICE

589	Abid Iqbal No. D 56	D I Khan	19 02 1986	05 12 2014	05 12 2016	11 01 2019	16 04 2020
590	Muhammad Hasharat No. D 53	D I Khan	12 04 1978	05 12 2014	05 12 2016	11 01 2019	16 04 2020
591	Anwar Khattak No. D 54	D I Khan	17 04 1978	05 12 2014	05 12 2016	11 01 2019	16 04 2020

~~(IRFAZ ULLAH MIANI) PSP  
ATC Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.~~

*Adel*

No. 431 (F-II CPO) seniority dated Peshawar, the 06 12 2022

Copy of above is forwarded for information and necessary action to the:-

1. All Addl. IGP in Khyber Pakhtunkhwa
2. All DIsG in Khyber Pakhtunkhwa
3. All Unit Heads in Khyber Pakhtunkhwa.
4. Capital City Police Officer, Peshawar
5. All Regional Police Officers in Khyber Pakhtunkhwa
6. Commandant PIC Hangu and FRP & SSU (CPI C) Khyber Pakhtunkhwa
7. Director IT, CPO Peshawar to upload the same on the official website of Khyber Pakhtunkhwa Police.
8. Registrar CPO
9. Office Supdr. Secret CPO

*Attached  
to  
Mr ASE*

*(IT)  
upload folder  
06/12/22*

REG IN DE SENIORITY LIST OF INSPECTORS OF KHYBER PAKHTUNKHWA POLICE

24

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

No. 147/E-II / Legal

dated the 15 / 03 / 2023.

**ORDER**

In compliance with Order Sheet of Hon'ble Supreme Court of Pakistan dated 26.01.2023 in Suo Moto Contempt proceedings vide Crl.O. Petition No. 38/2021 and in pursuance of Judgments passed by Hon'ble Supreme Court of Pakistan in 2013 SCMR 1752, Civil Review Petition No. 193/2003 reported in 2015 SCMR 456, 2016 SCMR 1254, 2017 SCMR 206, 2018 SCMR 1218 and consolidated Judgment dated 30.06.2020 in Civil Petitions No. 1996, 2026, 2431, 2437 to 2450, 2501 and 2502 of 2019 on issues of Out of Turn Promotions, all Unit Heads, Regional Police Officers and District Police Officers of Khyber Pakhtunkhwa Police were directed vide this office Letter No. CPO/CPB/75, dated 14.02.2023, to ensure compliance of above mentioned Orders in letter and spirit. Accordingly, all Out of Turn Promotions granted to Police personnel either on gallantry or otherwise belonging to different Units, Regions & Districts have been withdrawn by the concerned authorities and consequently their seniority has been re-fixed along with their batch mates/ among immediate seniors and juniors who were promoted during their intervening period by maintaining original inter-se-seniority.

2. In view of the above, case regarding Out of Turn Promotion of Inspector Ghafirullah No. P/130 was examined. As per details provided by office of RPO, Mardan Region vide Letter bearing No.1543 /ES, dated 13.03.2023 on subject "collection of data of police officers falling under the definition of out of turn promotion". The Officer was brought on promotion list "D" on 30.11.2007 with his Intermediate College Course colleagues; however, he was promoted out of turn as Officiating ASI by the RPO Mardan vide Order No. 4439-40/ES dated 27.08.2008 as a Special Case (Gallantry) and thereafter transferred his lien from Mardan Region to CCI Peshawar. Whereas his "D" list colleagues were promoted as Officiating ASIs in the DPC held in Regional Police Office, Mardan on 16.04.2010 and later on confirmed in the rank of ASIs, admitted to list "I" and promoted as Officiating SI in the year 2014. At present, he stands at serial No.466 of the seniority list "I" of Inspectors issued vide CPO Peshawar No.431/E-II/CPO/Seniority dated 06.12.2022. Withdrawal of this "out of turn promotion Order shall bring his name with his "D" list batch mates who are now on promotion list "I" as Sub Inspectors and will be placed below the name of Sub Inspector Shahbir Ahmad No. MR/375 present at S.No.439 in the seniority list of Sub Inspectors issued from CPO Peshawar vide No. 424/E-II/CPO/Seniority dated 01.12.2022.

3. In this regard, Para 122 of Judgment of Hon'ble Supreme Court of Pakistan 2015 SCMR 456 is reproduced as under;

122. The issue of out of turn promotions has been dealt with by us in detail in the judgment sought to be reviewed and we reached the conclusion that it was violative of Articles 240, 242, 4, 8, 9 and 25 of the Constitution. Mr. Adnan Iqbal Chaudhry, learned Advocate Supreme Court has contended that section 9-A of the Act has not been struck down by this Court, while declaring the out of turn promotions as unconstitutional. We are mindful of this fact as we have held that the Competent Authority can grant awards or rewards to the Police Officers, if they show act of gallantry beyond the call of duty. However, we had struck down the very concept of 'out of turn promotion' being violative of Constitution for the reasons incorporated in paras 156 to 164 of the judgment under review.

4. Similarly, as per Para No. 73 of Judgment of Hon'ble Supreme Court of Pakistan 2018 SCMR 1218 (Intra Court Appeals No.4 of 2017 etc) when any legislative instrument is declared unconstitutional, it is declared void ab initio. The Para No. 73 is being reproduced as under:

73. The contention of Khawaja Haris Ahmad, learned Sr.ASC that in Para no. 122 of Shahid Pervaiz's case (supra) this Court had wrongly observed that "we have already declared the legislative instruments that provided for out of turn promotions." because nowhere in the earlier judgment was such a declaration made, is also without force. Suffice it to say that in Para 104 of Shahid Pervaiz' Case (Supra), it was observed that: "104. Through the successions of its orders, this Court has consistently maintained the unconstitutionality, and the consequential nullity of the instruments providing for the out of turn promotion." Moreover, in Para 129 of the judgment of Ali Azhar Khan Baloch's case (supra), this Court was pleased to observe that when any legislative instrument is declared unconstitutional, the effect of such declaration is that such legislative instrument becomes void ab initio. The relevant part of Para 129 is being reproduced hereunder: "129. Now, it is a settled law of this Court that no right or obligation can accrue under an unconstitutional law. Once this Court has declared a legislative instrument as being unconstitutional,

(15)

the effect of such declaration is that such legislative instrument becomes void ab initio, devoid of any force of law, neither can it impose any obligation, nor can it expose anyone to any liability."

5. Similarly, Hon'ble Supreme Court of Pakistan Judgment reported as 2017 SCMR 456 vide Para No. 98 declared Out of Turn Promotions as null and void in the following terms which is reproduced as under:

98. In a series of judgments, this Court has declared out-of-turn promotions as being unconstitutional, un-Islamic, and void ab initio. The principle of unconstitutionality attached to the instrument providing for out of turn promotion was laid down first in the case of Muhammad Nadeem Arif vs. I.G of Police (2011 SCMR 408). The view taken in this judgment was followed in another case reported as Ghulam Shabbir vs. Muhammad Munir Abbasi (PLD 2011 SC 516); wherein it was held that out of turn promotion was not only against the Constitution, but also against the Injunctions of Islam; and that reward or award should be encouraged for meritorious public service but should not be made basis for out of turn promotion.

6. Mr. Ghafirullah No. P/103 Inspector was given chance of personal hearing on 12.03.2023. He was patiently heard. He was of the view that his case does not fall in the ambit of out of turn promotions. However, perusal of his record reveals that as mentioned in Para No. 2 of this order, the Officer was brought on promotion list "D" on 30.11.2007 with his Intermediate College Course colleagues, however, he was promoted out of turn as Officiating ASI by the RPO Mardan vide Order No. 4439-40/ES dated 27.08.2008 as a Special Case (Gallantry) and thereafter transferred his lien from Mardan Region to CJP Peshawar. Whereas his "D" list colleagues were promoted as Officiating ASIs in the DPC held in Regional Police Office, Mardan on 16.04.2010 and later on confirmed in the rank of ASIs, admitted to list "E" and promoted as Officiating SI in the year 2014. At present, he stands at serial No.466 of the seniority list "F" of Inspectors issued vide CPO Peshawar No.431/E-II/CPO/Seniority dated 06.12.2022. Withdrawal of this out of turn promotion Order shall bring his name with his "D" list batch mates who are now on promotion list "F" as Sub Inspectors and will be placed below the name of Sub Inspector Shahbir Ahmad No. MR/375 present at S.No.439 in the seniority list of Sub Inspectors issued from CPO Peshawar vide No. 424/E-II/CPO/Seniority dated 01.12.2022.

7. Consequently, his Out of Turn Promotion Order No. 4439-40/ES dated 27.08.2008 is withdrawn through this order and he is demoted from the rank of Inspector to the rank of Sub Inspector with immediate effect. After withdrawal of his Out of Turn Promotion his name is placed below the name of Sub Inspector Shahbir Ahmad No. MR/375 present at S.No.439 in the seniority list of Sub Inspectors issued from CPO Peshawar vide No. 424/E-II/CPO/Seniority dated 01.12.2022.

Sd-  
Akhtar Hayat Khan, PSP  
PROVINCIAL POLICE OFFICER,  
KHYBER PAKHTUNKHWA

- Attested  
cc
1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.
  2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
  3. Secretary, Home & TAs Department, Government of Khyber Pakhtunkhwa, Peshawar.
  4. Additional Inspector General of Police, HQs, Khyber Pakhtunkhwa, Peshawar.
  5. Additional Inspector General of Police, Operations Khyber Pakhtunkhwa, Peshawar.
  6. All Regional Heads, Khyber Pakhtunkhwa, Peshawar.
  7. All Heads of Police Units, Khyber Pakhtunkhwa.
  8. PSO to W/ Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
  9. AIG/ Legal, CPO, Peshawar.
  10. Registrar, CPO, Peshawar.

F-II  
Copy be provided  
to the applicant  
immediately  
30/12/2022

(REZWAN MANZOOR) PSP  
Deputy Inspector General of Police, HQs,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

(26)

**BETTER/LEGIBLE COPY.**

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

No. 147/E-II/ Legal ..... Dated the 15/03/2023.

**ORDER.**

In compliance with Order sheet of Hon'ble supreme Court of Pakistan dated 26/03/2023 in Sue Moto Contempt proceeding vide Crl.O Petition No. 38/2021 and in pursuance of judgment passed by Hon, ale Supreme Court Of Pakistan in 2013 SCMR 1752 Civil Review Petition No. 193/2003 reported in 2015 SCMR 456, 2016 SCMR 1254, 2017 SCMR 206, 2018 SCMR 1218 and consolidated judgment dated 30/06/2020 in Civil Petition No. 1996, 2026, 2431, 2437 to 2450, 2501 and 2502 of 2019 on issues of out of Turn promotion, all Unit Heads, Regional Police Officers and District Police of Khyber Pakhtunkhwa police were directed vide this office letter No. CPO/CPB/75, dated 14/02/2023, to ensure compliance of above mentioned Orders in letter and spirts. Accordingly, all out of turn Promotion granted to Police personnel either on gallantry or otherwise belonging to different Unions, Regions & Districts have been withdrawn by the concerned authorities and consequently their seniority has been re- fixed along with their batch matter/among immediate seniors and juniors who were promoted during their intervening period by maintaining original inter-se seniority.

2. In view of the above, case regarding out of Turn promotion of Inspector Ghafir Ullah No. P/130 was examined. As per details provided by office of RPO, Mardan Region vide Letter bearing No. 1543/ES, Dated 13/03/2023 on subject "**Collection of data of police officers falling under the definition of out of turn promotion**". The officer was brought on promotion list "D" on 30/11/2007 with his Intermediate College course Colleagues, however, he was promoted out of turn as Officiating ASI by the RPO Mardan vide Order No. 4439-40/ES dated 27/08/2008 as a Special case (Gallantry) and thereafter transferred his lien from Mardan Regional to CCP Peshawar. Whereas his "D" list colleagues were promoted as Officiating ASIs, in the DPC held in Regional Police Office, Mardan on 16-04-2010 and later on confirmed in the rank of ASIs, admitted to list "E" and promoted as Officiating SI in the Year 2014. At present he stand at serial No. 466 of the seniority list "F" of Inspectors issued vide CPO Peshawar No: 431/E-II/CPO /seniority dated 06-12-2022. Withdrawal of this out of turn promotion Order shall bring his name with his "D" list batch mates who are now on promotion list "F" as Sub Inspectors and will be placed below the name of Sub Inspector Shabir Ahmad No. MR/375 present at S. No 439 in the seniority list of sub Inspector issued CPO Peshawar vide No. 424/E-ii/CPO /Sonority dated 01/12/2022.

3. In this regard Para 122 of judgment of Hon'ble Supreme Court of Pakistan 2015 SCMR 456 is reproduced as under.

122. The issue of out of turn promotion has been dealt with by us in detail in the judgment sought to be reviewed and we reached the conclusion that it was violative of Articles 240,242, 4, 8, 9 and 25 of the Constitution. Mr. Adnan Iqbal Choudhry, learned Advocate Supreme Court has contended that section

*Altogether  
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MR  
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9-A of Act has not been struck down by this court, while declaring the out of turn promotion as unconstitutional. We are mindful of this fact as we have held that the Competent Authority can grant award or reward to the Police Officers, if they show act of gallantry beyond the call of the duty. However, we had struck down the very concept of 'out of turn promotion' being violative of Constitution for the reason incorporated in Para-158 to 164 of the judgment under review.

4. Similarly as per Para- No. 73 of the judgment of Hon'ble Supreme Court of Pakistan 2018 SCMR 1218 (Intra Court Appeal No. 4 of 2017 etc.) when any legislative instrument is declared unconstitutional, it is declared void ab initio. The Para No. 73 being reproduced as under,

73. The contention of Khwaja Haris Ahmad, Sr. ASC that in 122 at Shahid Pervaiz's case (Supra) this court has wrongly observed that we have already declared void ab initio the legislative instrument that provide for out of turn promotion "because nowhere in the earlier judgment was such a declaration made, is also without force. Suffice it to say that in Para 104 of Shahid Pervaiz's case (Supra) it was observed that 104, Through the successions of its order, this court has constantly maintained the unconstitutionality, and the consequential nullity of the instruments providing for the out of turn promotion". Moreover, in Para-129 of the judgment of Ali Azhar Khan Baloch's Case (Supra), this court was pleased to observe that when any legislative instrument is declare unconstitutional, the effect of such declaration is that such legislative instrument becomes void ab initio. The relevant part of Para- 129 is being reproduced hereunder: "129, ..... Now it is settled law of this court that no right or obligation can accrue under an unconstitutional law, once this court has declared a legislative instrument as being unconstitutional.

The effect of such declaration is that such legislative instrument becomes void ab initio, devoid of any force of law, neither can it impose any obligation nor can it expose any one to any liability.

5. Similarly Hon'ble Supreme Court of Pakistan judgment reported as 2017 SCMR 456 vide Para No. 98 declared out of turn promotion as null & void in the following terms which is reproduced as under:

98. In a series of judgments, this court has declared out of turn promotion as being unconstitutional, un-Islamic, and void ab initio. The principle of unconstitutionality attached to the instrument providing for out of turn promotion was laid down first in the case of Muhammad Nadeem Arif vs. I.G of Police (2011 SCMR 408). The view taken in this judgment was followed in another case reported as Ghulam Shabir vs. Muhammad Munir Abbas (PLD 2011 SC 516): wherein it was held that out of turn promotion was not only against the Constitution, but also against the injunctions of Islam: and that reward or award should be encouraged for meritorious public service but should not be made basis for out of turn promotion.

6. Mr. Ghafir Ullah No. P/103 Inspector was given chance of personal hearing on 12.03. 2023. He was patiently heard. He was of the view that his case does not fall in the ambit of out of turn promotions. However, perusal of his record reveals that as mentioned in Para No. 2 of his order, the officer was brought on promotion list "D" on 30-11-2007 with his Intermediate College Course colleagues, However, he was promoted out of turn as Officiating ASI by the RPO Mardan vide Order No. 4439-40/ES dated 27-08-2008 as a Special

*Attested*  
*[Signature]*

Case (Gallantry) and thereafter transferred his lien from Mardan Region to CCP Peshawar. Whereas his "D" list colleagues were promoted as Officiating ASIs in the DPC held in Regional Police Office, Mardan on 16-04-2010 and later on confirmed in the rank of ASIs, admitted to list "E" and promoted as Officiating SI in the year 2014. At present he stands at S.No. 466 of the seniority list "F" of Inspectors issued vide CPO Peshawar No. 431/E-II/CPO/Seniority dated 06-12-2022. Withdrawal of this out of turn promotion Order shall bring his name with his "D" list batch mates who are now on promotion list "F" as Sub-Inspectors and will be placed below the name of Sub-Inspector Shabir Ahmad No. MR/375 present at S.No. 439 in the seniority list of Sub-Inspectors issued from CPO Peshawar vide No. 424/E-II/CPO/ Seniority dated 01-12-2022.

6. Consequently, his out of turn promotion Order No. 4439-40/ES dated 27-08-2008 is withdrawn through this order and he is demoted from the rank of Inspector to the rank of Sub-Inspector with immediate effect. After withdrawal of his Out Of Turn Promotion his name is placed below the name of Sub-Inspector Shabir Ahmad No. MR/375 present at S.No. 439 in the seniority list of Sub-Inspectors issued from CPO Peshawar vide No. 424/E-II/CPO/ seniority dated 01-12-2022.

Sd/-

Akhtar Hayat Khan, PSP  
PROVINCIAL POLICE OFFICER,  
KHYBER PAKHTUNKHWA

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*Attested*  
*Mr*

Sd/-

(Rizwan Manzoor) PSP  
Deputy Inspector General of Police HQrs  
For Inspection General Of Police  
Khyber Pakhtunkhwa,  
Peshawar



Annex - "F"

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

Phone No. 0937-0230113, Fax No. 0937-0230115  
Email Address: - [rsppmardan@gmail.com](mailto:rsppmardan@gmail.com)

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

No. 2099 /ES, dated Mardan Region, the 07/04/2023.

Subject: REPORT AFTER REVISITING THE CASES OF POLICE OFFICERS -  
FALLING UNDER THE DEFINITION OF OUT OF TURN PROMOTION.

Memo: Please refer to this office Memo No. 1212/ES dated 01.03.2023 and your  
office Memo No. CPO/CPD/75 dated 14.02.2023.

The Officers who fall under the definition of out of turn promotion were  
accorded seniority after their demotion. However, those who are aggrieved regarding  
fixation of their seniority have submitted representations to the undersigned alleged  
therein that their demotion and subsequent fixation of their seniority have erroneously  
been done and requested for revisiting the same. In order to revisit the issue in  
question, a Committee under the Chairmanship of District Police Officer, Mardan was  
constituted vide this office order endorsement 1913-22/ES dated 29.03.2023 to examine  
case of each Police Officer afresh carefully with a view to ascertain as to whether or not  
his seniority has rightly been fixed or otherwise.

The Committee ibid after revisiting case of each Police Officer, submitted  
its report and made recommendations regarding fixation of seniority because seniority  
of some of the Officers fixed earlier has erroneously been fixed.

Keeping in view the recommendations of the aforementioned Committee,  
the same is sent herewith for revisiting the cases of Officers mentioned therein for  
fixation of their seniority.

  
Regional Police Officer,  
Mardan.

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**COMMITTEE REPORT**

After getting representations from the Officers who were serving as Inspectors/DSP before withdrawal of Out of turn promotions, a Committee comprising of the following Officers was constituted by the Regional Police Officer, Mardan vide his office order endorsement No. 1013/22/EO dated 29.01.2023

1	Mr. Najeeb Ur Rahman Durrani (PSP)	DPO/Mardan	(Head)
2	Mr. Waseel Ahmad	DSP Legal, Mardan	(Member)
3	Mr. Faheem Khan	Acting DSP Legal, Swabi	(Member)
4	Mr. Iqbal Hussain	Acting DSP Legal, Nowshera	(Member)
5	Mr. Waheed Shah	Establishment Clerk Region Office, Mardan	(Member)
6	Mr. Waheed Khan	Establishment Clerk of District Mardan	(Member)
7	Mr. Faisal Khan	Establishment Clerk DPO Office, Nowshera	(Member)
8	Mr. Zia Ur Rehman	Establishment Clerk DPO Office, Swabi	(Member)
9	Mr. Tehseen Ullah	Establishment Clerk DPO Office, Charsadda	(Member)

After examination and scrutiny of the available record and thorough discussion on the plea taken by the applicants, the following position has

merged.

S. No.	Region/District	Name	Rank in which he was serving	Initial demoted Rank	Rank after scrutiny of record	Remarks
1.	Mardan	Mr. Jan Zada	DSP	Inspector	DSP	The Officer was received as Offg. ASI and his file was transferred to Mardan Region vide CPO Peshawar Order No. 2368-09/E-0 dated 03.02.2007. As all the administrative orders pertaining to Out of turn promotions have been done away with by the Honorable Supreme Court of Pakistan. This case may be referred to Capital City Police Officer, Peshawar to be dealt with in accordance with

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S. No.	Region/District	Name	Rank in which he was serving	Initial Rank at demoted	Rank after scrutiny of record	Remarks
8	Mardan	Muhammad Khan No. P/253	Inspector	Sub Inspector	Inspector	The Officer was given out of turn promotion as Cdg. Assistant Sub Inspector from Mardan Region on the basis of seniority. The fee was deducted from Mardan Region and attached with Capital City Police, Peshawar vide Central Police Office, Peshawar order endorsement No. 18514-1754 dated 04.08.2000. Out of turn promotion given by Mardan Region is hereby withdrawn. The case may be referred to Capital City Police, Peshawar to treat this as 'T' list Head Constable for Station of its authority with the 'T' list rank order for the term ending 20.09.2005 instead of treating him as Officiating Assistant Sub Inspector on transfer of his fee vide Central Police Office, Peshawar order endorsement No. 18514-1754 dated 04.08.2000.
9	Mardan	Ghaffar Khan	Inspector	Sub Inspector	Inspector	The Officer was given out of turn promotion as Cdg. Assistant Sub Inspector from Mardan Region on the basis of seniority. The fee was deducted from Mardan Region and attached with Capital City Police, Peshawar vide Central Police Office, Peshawar order endorsement No. 18514-1754 dated 04.08.2000. Out of turn promotion given by Mardan Region is hereby withdrawn. The case may be referred to Capital City Police, Peshawar to treat this as 'T' list Head Constable for Station of its authority with the 'T' list rank order for the term ending 20.11.2007 instead of treating him as Officiating Assistant Sub Inspector on transfer of his fee vide Central Police Office, Peshawar order endorsement No. 18514-1754 dated 04.08.2000.
10	Mardan	Muhammad Shah	Inspector	Sub Inspector	Inspector	Record in respect of these Police Officers who completed Intermediate College Course for the term ending 20.09.2004, was perused and it was found that Inspector Asif Muhammad who is 'T' list rank order may be read by placing the name below the name of Inspector Asif Muhammad mentioned in serial No. 524 of Inspectors list 'T'. Name of the said Officer has been promoted as Cdg. Inspector to the normal routine. Hence, the seniority may be read by placing the name below the name of Inspector Asif Muhammad mentioned in serial No. 524 of Inspectors list 'T'. Record in respect of the said Officer was perused which transpired that none of the colleagues of
11	Mardan	Muhammad Khan	Inspector	Sub Inspector	Inspector	Record in respect of the said Officer was perused which transpired that none of the colleagues of

10-11

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(Mr. Najeeb Ur Rehman Bugti) PSP  
District Police Officer  
Mardan  
Head

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(Mr. Farooq Khan)  
Establishment Clerk  
DPO Office, Charsada  
Member

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(Mr. Farooq Khan)  
Establishment Clerk  
DPO Office, Nowshera  
Member

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(Mr. Zia Ur Rehman)  
Establishment Clerk  
District Swat  
Member

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(Mr. Zahed Khan)  
Establishment Clerk  
District Mardan  
Member

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To,

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The Provincial Police Officer Khyber Pakhtunkhwa  
Peshawar.

Sir,

It is submitted for kind information that I was appointed as constable in Police Department 30-01-1991. My name was brought in Promotional list A-I and B-I According to standing order No 10/ 1987 letter on I have qualified Lower College Course from PTC Hangu in the term ending 10 April 1999 at serial No 155 in the result issued wide Notification, No 2174/S dated 8 May 1999.

I have qualified intermediate College Course from the term ending 30/11/2007. My name exist at serial No: 100 in the intermediate college Course Result issued from PTC Hangu.

I have Confirmed in the rank of ASI and promoted to list E on 27/9/2011 by the CCPO Peshawar.

I have promoted as Offg: Sub Inspector by Capital City Police Peshawar on 22/11/2013 vide Notification number 18764-73 EC-I dated 22/11/2013.

I have confirmed in the rank of SI by the Capital City Police Peshawar on 12/11/2015 according to police rule 13/18 after Completion of all conditions required for confirmation in the rank of SI.

My name was admitted to list "F" on 11/1/2019 according to Police rule 13-15 after proper recommendation on form 13-15 by the Concerned DPO, RPO and CCPO Peshawar.

I was promoted as Offg: Inspector on 28/12/2020 by Provincial Police Officer.

My name exist at serial number 466 in the seniority list of Inspectors. Issued by Central Police Office Peshawar on 6/12/2022 vide Endst: Number 4311 E-II CCPO.

I was reverted from the rank of Inspector to the rank of Sub- Inspector by the CCPO vide Order No 147/E-II/ Legal dated 15/3/2023 in the reason of Out of Turn Promotion. Which is in correct because I have no granted any out of turn promotion? The out of turn promotion means is that a promotion given to any

Attended  
by  
M/ACE

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person in violation of rules while I have granted all promotions according to Police rule chapter 13 of police rule 1934 and standing order No 10 of 1987 .


My case regarding out of turn promotion was examined by committee Constituted by the RPO Mardan under the Chairman of DPO Mardan . The committee recommended that my seniority may be fixed by the Capital City Police Peshawar with my D list batch -mates

The RPO Mardan Region forwarded the recommendation of committee to CPO on 7/4/2023 vide letter No:2099/ES while my reversion was issued on 15/3/2023 before the committee's recommendation. The RPO Mardan Region vide letter No: 379/ES date 19/2/2024 again clarified the committees recommendation that after thorough scrutiny of available record submitted it's report and made recommendation regarding Re-fixation of Seniority as the former committee had restricted it self to the batch- mates of the officer out of turn promotion . The RPO Mardan Region has further stated that as per direction of your good office a fact - finding enquiry has been initiated and the same has been entrusted to Muhammad Suleman (PSP) Superintendent of Police Investigation Mardan vide this office order-endorsement No. 374/ES date 15-02-2024 to fix responsibility for wrongly working out seniority of the officer in disregard of the service record order of seniority and merit while communicating the same to Central Police Office , Peshawar for revisiting/reviewing their seniorities in out of Turn cases.

In the light of above facts and recommendation of the committee constituted by RPO Mardan my seniority has been correctly fixed by Capital City Police Peshawar with my D list batch-mates Inspector Noor Haider No P/70 at serial No 464 in the seniority list of inspector issued on 6/12/2022 vide Endst: 431 . Which is peppered from the date of confirmation as Sub - Inspector according to Police Rule 13-15 in which it was decided that the seniority in list F will be maintained from the date of confirmation in the rank of SI.

It is therefore requested, that my reversion from the rank of Inspector BPS -16 to Sub-Inspector Issued vide CPO litter No 147 /E-II/ Legal, date 15-03-2023 may kindly be withdrawn.

You're sincerely

  
Sub-Inspector Ghafir Ullah  
27-6-2024

Att-ested  
to  
AW



(35) OFFICE OF THE  
DISTRICT POLICE OFFICER, CHARSADDA  
PHONE# 091-9220400 FAX#091-9220401  
EMAIL: [charsaddadpo@yahoo.com](mailto:charsaddadpo@yahoo.com)

No. S/11 /EC, dated Charsadda the 29/06/2024

To  
The Regional Police Officer,  
Mardan

Subject: APPLICATION

Enclose Kindly find herewith an application submitted by SI Ghafir Ullah No. P/130 of this district Police requesting therein for with drawl of his reversion from Inspector to Sub-Inspector issued vide CPO Letter No. 147/E-II/Legal dated 15.03.2023, for favor of perusal and further submission to CPO Peshawar, Pease.

Enclose (A.A)

  
DISTRICT POLICE OFFICER  
CHARSADDA

Attested  
by  
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(36)

**POWER OF ATTORNEY/VOKALATNAMA**

**IN THE COURT OF KP SERVICE TRIBUNAL PESHAWAR.**

Ghazir Ullah Sub-Inspector Police

{Accused  
{Petitioner  
{Appellant ✓

**VERSUS**

The PPD KP Ex officers

{Complainant  
{Respondent(s) ✓  
{Judgment Debtor

I/We the undersigned Appellant, named above, do hereby authorize/appoint Mr. Muhammad Usman Khan Turlandi, Advocate Supreme Court of Pakistan to do all or any of the following acts, deeds/things in the above captioned case:

- 1) To appear, act, sign, record statement and plead for me/us the above titled case before this august Court/Tribunal wherein it may be tried/heard and other proceedings pertaining/arising or connected therewith.
- 2) To sign, verify compromise and file or withdraw proceedings, petitions, appeals affidavits and any other documents as may be deemed necessary or advisable by them for the conduct or prosecution or defense in the said case at any stage.
- 3) To receive payment of, receive all money that may be or become due payable to me/us during the course/conclusion of the proceedings and issue receipts accordingly.
- 4) To do all other acts and things which may be deemed necessary or advisable during the course/conclusion of the proceedings. **And hereby agree:**
  - A) To ratify whatever the said Advocate being my/our Council may do in the proceedings.
  - B) Not to hold the Advocate responsible if the said case is proceeded Ex-Parte or dismissed in default in consequence of absence from the Court/Tribunal when it was called for hearing.
  - C) That the advocate shall be entitled to withdraw from the prosecution/conducting of the said case if the whole or any part of the agreed fee remains unpaid.

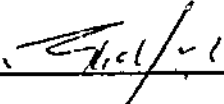
In witness thereof, I/We have signed this power of attorney/Vokatnama hereunder and the contents whereof have been read/explain to me/us and fully got understood to me/us this 16th day of Oct/2024

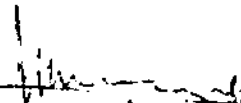
P/A Accepted

Terms: & Conditions are accepted

  
16/10

Muhammad Usman Khan  
Turlandi (bc No. 10-7472)  
Advocate Supreme Court NO. 5045  
CNIC No. 17301-1723606-3  
e-mail; [usmankhan@gmail.com](mailto:usmankhan@gmail.com)  
Mobile Contact; 0333-9153699.

Signatures   
CNIC NO. \_\_\_\_\_  
Contact No. 0312-5915358

  
Dawood Khan  
Advocate Peshawar.  
0300-5395841