

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No. 1771/2023 along with others 05 connected Service Appeals

Tayyab Jan etc.....Appellants

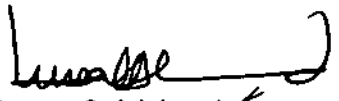
VERSUS

Inspector General of Police Khyber Pakhtunkhwa etc.....RESPONDENTS

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DEPONENT


SP Court & Litigation,
CPO, Peshawar

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No. 1771/2023 along with others 05 connected Service Appeals

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VERSUS

Inspector General of Police Khyber Pakhtunkhwa etc.....RESPONDENTS

REQUEST FOR SUBMISSION OF ADDITIONAL DOCUMENTS ON FILE

RESPECTFULLY SHEWETH:


The respondent department humbly submits as under:-

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 18180
Dated 21-11-24

1. That the captioned service appeal is pending adjudication before this Hon'ble Tribunal and is fixed for 22.11.2024.
2. That the Hon'ble Tribunal vide order sheets dated 28.06.2024 and 22.07.2024 adjourned the case with the direction to department to place additional documents on the next date of hearing.
3. That in compliance of the order ibid information received from Deputy Commandant FRP Khyber Pakhtunkhwa vide letter No. 11441/EC dated 08.10.2024 (copy attached as **Annexure-A**) are hereby submitted for placing the same on file.

PRAYERS

It is, therefore, humbly prayed that the above noted documents as ordered vide order sheets mentioned above may please be placed on file.


AIG/Legal
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar
(MUHAMMAD ASIF)
Incumbent

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No. 1771/2023 along with others 05 connected Service Appeals

Tayyab Jan etc.....Appellants

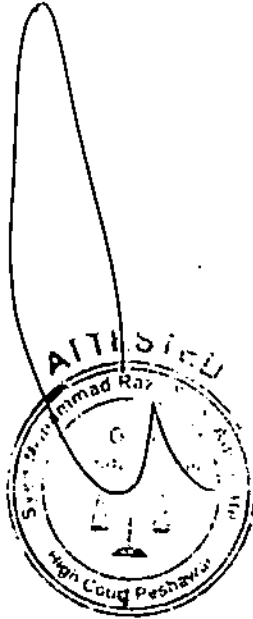
VERSUS

Inspector General of Police Khyber Pakhtunkhwa etc.....RESPONDENTS

AFFIDAVIT

I, Wisal Ahmad SP Court & Litigation, CPO, Peshawar do hereby solemnly affirm and declare on oath that the contents of application for placement of additional documents on behalf of Respondent are true, correct and to the best my knowledge & belief. Nothing has been concealed from this Honorable Tribunal.

DEPONENT



Wisal Ahmad
SP Court & Litigation,
CPO, Peshawar

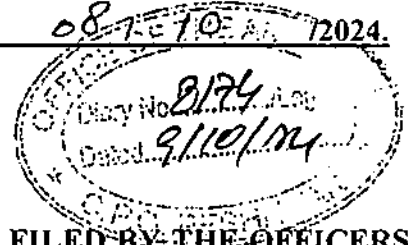
21 NOV 2024



OFFICE OF THE COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA, PESHAWAR
Email: comdtfrpofficial@gmail.com
Ph: No. 091-9211773 Fax No. 091-9214114

No. 11441 /EC, dated Peshawar the, 08 10 2024

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



Subject:- SERVICE RECORD IN SERVICE APPEALS FILED BY THE OFFICERS OF FRP IN HONRABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Memo:- Kindly refer to CPO letter No. 2812/Legal dated 12.07.2024 and subsequently reminder No. 3551-55/Legal dated 04.09.2024 on the subject cited above.

In compliance with the above cited letters, the Service Rolls/Service Books of the following Officers have been checked and details given below are submitted herewith as desired please.

S/No.	Name of Officer	Service Record in FRP Khyber Pakhtunkhwa	Remarks
1.	Mr. Nasir Khan DSP	1. Enlisted in FRP on 02-05-1991 as Constable.	After induction, he qualified all promotion examinations as per laid-down procedure according Police Rules, on merit/ seniority bases and promoted to the rank of Offg: SI on List "E" in this unit being literate officer. <u>He never got any type of Out of Turn promotion on the bases of Gallantry, Shoulder, Cadetship or Special case in FRP.</u> Detail into the matter has already been communicated to your office vide this office letter No.11127/EC, dated 14-12-2021 and letter No.1799/EC, dated 23-02-2022 accordingly.
		2. Qualified Recruit Course on 20-03-1992	
		3. Qualified A-I Exams on 26-03-1995	
		4. Qualified B-I Exams on 15-03-1997	
		5. Qualified Lower College Course on 10-10-1997	
		6. Brought on list "C" on 10-11-1997 in FRP	
		7. Promoted as Head Constable on 14-04-1998	
		8. Qualified Intermediate Course on 10-10-1998	
		9. Brought on List "D" w.e.f 20-10-1998 in FRP	
		10. Confirmed Head Constable in FRP on 17-02-2000	
		11. Promoted as Offg: A S.I in FRP on 04-04-2000	
		12. Qualified Upper College Course on 20-09-2000	
		13. Transfer to Traffic/CCP Pesh: on deputation on 09-10-2000	
		14. Date of Confirmation as: ASI on 20-02-2001	
		15. Brought on List "E" w.e.f 20-02-2001	
		16. Promoted as Offg: S.I or, 20-02-2001 in FRP	
		17. Transferred to CCP Peshawar on 17-06-2002	
		18. Lien Transferred to CCP Peshawar on 08-10-2002, given bottom seniority and issued Dist: Belt No.167/P vide CCPO endst: No.4239-40/EC-1, dated 14-10-2002	
		19. In DPC dated 24-07-2003 he was reverted from SI to HC and his seniority fixed with List "D" officials who were promoted as ASI on 25-05-2005 and SI on 21-04-2008. He submitted Appeal No.1101/2017 in Service Tribunal vide judgment dated 23-09-2008, <u>quashed the reversion orders and restore his previous rank as SI and Seniority vide CCPO Orders No. 8814-17 /EC-I, dated 16-06-2009.</u>	
		20. Confirmed in the rank of SI on List "E" w.e. from 20-02-2003 in CCP vide S.Tribunal Appeal No.407/2011 dated 23-05-2012 and Supreme Court of Pakistan judgment dated 07-10-2020 in Civil Appeal No.164-P/2014 By CPO	
		21. Brought on List "F" w.e.f. 31-12-2005 & Promoted Offg: Inspector on 30-07-2010 by CPO in CCP Peshr:	
		21. Confirmed as Inspector on 29.08.2014 By CPO in CCP	
		22. Qualified 2 nd Advance Course on 03-11-2015 from PTC Hangu, mandatory for DSP promotion.	
		23. Promoted as DSP (BS-17) on 30-01-2018 By CPO	
24. Qualified 6 th Junior Command Course on 27-11-2020 mandatory for SP promotion from Pakistan Rural Academy			
2.	Mr. Shakil Khan DSP	1. Enlisted in FRP on 27-04-1995 as Constable.	After induction, he qualified all promotion examinations as per laid-down procedure according to Police Rules, on merit seniority bases and promoted to the rank of Offg SI on List "E" in this unit being literate
		2. Qualified Recruit Course on 28-02-1996	
		3. Qualified A-I Exams on 05-01-1999	
		4. Qualified B-I Exams on 02-04-2001	
		5. Qualified Lower College Course on 20-10-2001	
		6. Brought on list "C" in FRP on 14-12-2001	
		7. Promoted as Offg: HC in FRP on 16-09-2004	
		8. Confirmed as Head Constable in FRP on 05-03-2007	
		9. Promoted as Offg: ASI in FRP on 27-09-2007	
		10. Nominated Intermediate College Course on 11-12-2009	


SAC
for mediation.
AS/L
9/10
mistakeful
DNO

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		<p>directions of CPO vide No. 14377/E-I dated 10.06.2009 vide this office letter No. 7061-62/EC dated 26.10.2010 and No. 2292-93/EC dated 28.03.2013 are as under:</p> <p>i.. Offg: ASI w.e.from 27-09-2007.</p> <p>ii.. confirmed as ASI and promoted on list E w.e.f 01-07-2010.</p> <p>iii.. Offg: SI w.e.f 29-01-2009.</p> <p>iv. confirmed as SI w.e.from 01.07.2010</p> <p>12. Qualified Upper College Course on 01-10-2011 /FRP</p> <p>13. Brought on List "F" on 09-05-2013 by CPO in FRP</p> <p>14. Promoted as Offg: Inspector on 09-05-2013 by CPO FRP</p> <p>15. Confirmed in the rank of Inspector on 27-08-2019 vide CPO notification no. 10764/E-II dated 09-05-2012</p> <p>16. Qualified 10th Advance Course on 05-07-2019</p> <p>17. Promotion as DSP on 30-12-2019 by CPO Peshawar</p> <p>18. Qualified 8th Junior Command Course on 18-04-2023 mandatory for SP promotion from Pakistan Rural Academy Pesh: by CPO vide Order No. 12347/Trg: dated 24-10-2022.</p>	<p><u>on the strength of FRP and never got any type of Out of Turn promotion on the bases of Gallantry, Shoulder, Cadetship or Special case in FRP.</u> Detail into the matter has already been communicated to your office vide this office letter No.11127/EC, dated 14-12-2021, letter No.5570/EC dated 07-07-2022 and letter No. 4000/EC dated 25-04-2022 accordingly</p>
3.	Mr. Mohammad Riaz DSP	<p>1. Enlisted in FRP on 09-09-1991 as Constable</p> <p>2. Qualified Recruit Course on 25-11-1992</p> <p>3. Qualified A-I Exams on 17-01-1996</p> <p>4. Qualified B-I Exams on 10-03-1998</p> <p>5. Qualified Lower College Course on 28-10-1998</p> <p>6. Promoted as HC and brought "D" in FRP on 07-04-2000</p> <p>7. Qualified Intermediate College Course on 20-09-2000</p> <p>8. Promoted as ASI on 18.10.2004 on list "D" in FRP</p> <p>9. promoted as SI/PC vide order No. 7296-7303/EC dated 18-10-2004 in FRP</p> <p>10. Transferred to Domicile Dist/ Kohat Range vide Orders No.25317-23/E-II, dated 14-11-2007</p> <p>11. His promotion was regularized in compliance with directions of CPO vide No. 14377/E-I dated 10.06.2009 vide this office letter No. 535-36/EC dated 23.01.2010 as under:</p> <p>i.. Offg: ASI w.e.from 04-12-2000.</p> <p>ii.. confirmed as ASI and promoted on list E w.e.f 01-07-2003.</p> <p>iii.. Offg: SI w.e.f 01-01-2005.</p>	<p>After induction, the officer qualified all promotion exams as per laid-down procedure, according Police Rules/Standing Orders and promoted to the rank of SI/PC on List "D" in FRP and later on <u>transferred to Domicile Distt./Range vide Orders No.25317-23/E-II, dated 14-11-2007.</u> He never got any type of Out of Turn promotion on the bases of Gallantry, Shoulder, Cadetship or Special case in FRP. <u>Furthermore, the RPO concerned is in better position to give the onward service particulars and promotion details/ Records of Officer,</u> after his transfer.</p>
4.	Mr. Mohammad Iqbal DSP	<p>1. Enlisted in FRP on 16-10-1991 as Constable</p> <p>2. Qualified Recruit Course on 08-06-1992</p> <p>3. Qualified A-I Exams on 05-03-1996</p> <p>4. Qualified B-I Exams on 10-03-1998</p> <p>5. Qualified Lower College Course on 10-10-1998</p> <p>6. Promoted as HC on 02-09-1999</p> <p>7. Qualified Intermediate College Course on 20-04-2000</p> <p>8.. Brought on list "D" on 20-06-2000.</p> <p>9. Promoted as SI/P on 22-07-2003 In FRP</p> <p>10. Transferred to Domicile Dist/ Mardan Range vide Orders No.25317-23/E-II, dated 14-11-2007</p> <p>11. His promotion was regularized in compliance with directions of CPO vide No. 14377/E-I dated 10.06.2009 vide this office letter No. 1874-75/EC dated 10.03.2010 as under:</p> <p>i.. Offg: ASI w.e.from 20-04-2000.</p> <p>ii. confirmed as ASI & promoted on list E w.e.f 01-07-2003.</p> <p>iii.. Offg: SI w.e.f 04-12-2004.</p>	-do-
5.	Mr. Sajjad Haider DSP	<p>1. Enlisted in FRP on 20-06-1988 as Constable</p> <p>2. Qualified Recruit Course on 20-12-1988</p> <p>3. Qualified A-I Exams on 26-02-1995</p> <p>4. Qualified B-I Exams on 10-03-1998</p> <p>5. Qualified Lower College Course on 10-11-1998</p> <p>6. Promoted as HC & brought "C" in FRP on 28-10-1999</p> <p>7. Qualified Intermediate College Course on 08-06-2000</p> <p>8. Promoted as SI/PC on 22-07-2003</p> <p>9. Qualified Upper College Course on 28-09-2005</p> <p>10. Transferred to Domicile Dist/ Hazara Range vide Orders No.25317-23/E-II, dated 14-11-2007</p>	-do-

		<p>directions of CPO vide No. 14377/E-I dated 10.06.2009 vide this office letter No. 1874-75/EC dated 10.03.2010 as under:</p> <p>i.. Offg: ASI w.e.from 20-04-2000.</p> <p>ii.. confirmed as ASI and promoted on list E w.e.f 01-07- 2003.</p> <p>iii.. Offg: SI w.e.f 04-12-2004.</p>	
6.	Mr. Tayyab Jan DSP	<p>1.Enlisted in FRP on 01-07-1989 as Constable</p> <p>2.Qualified Recruit Course on 20-12-1989</p> <p>3. Transferred from FAR to Peshawar District on 06-03-1991</p> <p>4.Qualified A-I Exams on 25-06-1994 from CCP Peshawar</p> <p>5. Promoted as HC in FRP on 25-10-1992</p> <p>6.Qualified Lower College Course on 20-04-1998</p> <p>7.Lien transferred to FRP from CCP vide CPO order no. 9807/E-I dated 08-06-1998</p> <p>8. Qualified Intermediate College Course on 10-04-1999, photocopy attached in Service Roll</p> <p>9. Promotion as ASI/PC in FRP on 26-07-2000</p> <p>10. Promoted as SI/PC in FRP vide order no. 3735-39/EC dated 22-07-2003</p> <p>11. Transferred to Domicile Dist/ C.C.P Peshawar vide Orders No.25317-23/E-II, dated 14-11- 2007</p> <p>12. Promotion to the rank of Offg: ASI, confirmation in the rank of ASI, promotion list "E" & to the rank of Offg: SI has been regularized in compliance with CPO endst: No. 25317-23/E-II dated 04.11.2007 by the CCPO Peshawar vide notification No. 10953/EC-I dated 25.10.2008.</p>	-do-
7.	Mr. Ali Hassan DSP	<p>1.Enlisted in FRP Kohat on 18-12-1988 as Constable</p> <p>2.Qualified Recruit Course on 30-06-1989</p> <p>3.Qualified A-I Exams on 16-01-1993 in PTC Hangu</p> <p>4. Qualified B-I Exams on 25-02-1995 in PTC Hangu</p> <p>5. Qualified Lower College Course on 20-09-1995 FRP</p> <p>6. Promoted as HC in FRP on 12-12-1991 in PTC Hangu</p> <p>7. Qualified Intermediate College Course on 20-09-1996</p> <p>8. Promotion as ASI/PC in FRP on 01-01-1995</p> <p>9. Transferred to Domicile Dist/ Kohat Range vide Orders No.25317-23/E-II, dated 14-11- 2007</p> <p>10. promoted as SI/PC vide corndt FRP No. 2376-81/EC dated 28-01-1998</p> <p>11. qualified Upper College Course on 10-10-1998 in FRP</p> <p>12. list E in FRP on 08-02-2002</p> <p>13. His promotion was regularized in compliance with directions of CPO vide No. 14377/E-I dated 10.06.2009 vide this office letter No. 8904-10/EC dated 01-08-2009</p> <p>i.. Offg: ASI w.e.from 01-01-1996.</p> <p>ii. Offg: SI w.e.from 08-01-1998</p> <p>iii.. confirmed as ASI and promoted to list E w.e.f 01-07- 2003.</p> <p>iv.. confirmed in the rank of SI w.e.f 01-07-2006.</p>	-do-
8.	Mr. AurangZeb DSP	<p>1.Enlisted in FRP Hazara on 03-10-1989 as Constable</p> <p>2.Qualified Recruit Course on 06-04-1990</p> <p>3.Qualified B-I Exams on 10-03-1998</p> <p>4.Qualified Lower College Course on 10-11-1998</p> <p>5. Promoted as HC on 30-05-1992 in FRP</p> <p>6. Qualified Intermediate College Course on 20-04-2000</p> <p>7. Promoted as SI/PC on 22-07-2003 in FRP on list "D"</p> <p>8.Transferred to Domicile Dist/ Hazara Range vide Orders No.25317-23/E-II, dated 14-11- 2007</p> <p>9. His promotion was regularized in compliance with directions of CPO vide No. 14377/E-I dated 10.06.2009 vide this office letter No. 800-09/EC dated 16-01-2009</p> <p>i.. Offg: ASI w.e.from 20-04-2000.</p> <p>ii. confirmed as ASI and promoted to list E w.e.f 01-07-2003</p> <p>iii. Offg: SI w.e.from 04-12-2004</p>	-do-
9.	Mr. Habib UR Rehman DSP	<p>1.Enlisted in FRP Hazara on 03-10-1989 as Constable</p> <p>2.Qualified Recruit Course on 20-03-1990</p> <p>3.Qualified A-I Exams on 26-02-1995</p> <p>4.Qualified B-I Exams on 11-03-1997</p> <p>5.Qualified Lower College Course on 30-04-1998</p> <p>6. Promoted as HC and brought "C" on 01-05-1999</p> <p>7. Qualified Intermediate College Course on 13-10-1999</p> <p>8.Confirmation as HC on 02-07-2001</p> <p>9.Pomotion on List "D" on 13-10-1999</p> <p>10. Promotion as ASI/PC on 02-11-2002 in FRP</p> <p>11. Promoted as SI/PC on 22-07-2003 in FRP on list "D"</p>	-do-

	<p>No.25317-23/E-II, dated 14-11-2007</p> <p>13 His promotion was regularized in compliance with directions of CPO vide No. 14377/E-I dated 10.06.2009 vide this office letter No. 7737/EC dated 17-10-2009</p> <p>i.. Offg: ASI w.e.from 02-12-1999.</p> <p>ii. confirmed as ASI and promoted to list E w.e.f 01-07-2003</p> <p>iii. Offg: SI w.e.from 20-02-2003</p>	
<p>10. Mr. Liaqat Ali Inspector</p>	<p>1.Enlisted in FRP Hazara on 07-08-1991 as Constable</p> <p>2.Qualified Recruit Course on 30-06-1992</p> <p>3.Qualified A-I Exams on 05-03-1996</p> <p>4.Qualified B-I Exams on 10-03-1998</p> <p>5.Qualified Lower College Course on 27-10-1998 from FRP</p> <p>6. Promoted as HC and brought "C" on 01-03-2001 in FRP</p> <p>7. Qualified Intermediate College Course on 27-10-2000 from FRP</p> <p>8. Transferred to Domicile Distt/ Hazara Range vide Orders No.25317-23/E-II, dated 14-11-2007</p> <p>9. His promotion was regularized in compliance with directions of CPO vide No. 14377/E-I dated 10.06.2009 vide this office letter No. 7737/EC dated 17-10-2009</p> <p>i.. Offg: ASI w.e.from 04-12-2000.</p> <p>ii. confirmed as ASI and promoted to list E w.e.f 01-07-2003</p> <p>iii. Offg: SI w.e.from 20-05-2005</p>	<p>After induction, the officer qualified all promotion exams as per laid-down procedure, according Police Rules/Standing Orders and promoted to the rank of IHC on List "D" in FRP and then transferred to Domicile Distt/ Hazara Range vide Orders No.25317-23/E-II, dated 14-11-2007. He never got any type of Out of Turn promotion on the bases of Gallantry, Shoulder, Cadetship or Special case in FRP. Furthermore, the RPO concerned is in better position to give the onward service particulars and promotion details/Records of Officer, after his transfer,</p>


DEPUTY COMMANDANT,
 For Commandant,
 Frontier Reserve Police,
 Khyber Pakhtunkhwa, Peshawar.