

24<sup>th</sup> June, 2022

Notice issued  
for 17/08/22  
Rs. 500/-  
Appellant Deposited  
Security & Process Fee  
A. M. J. 28/6/22

Counsel for the appellant present and submits that vide impugned order dated 10.02.2022 regarding his dismissal from service, the appellant filed departmental appeal on 28.02.2022 which was rejected on 31.05.2022. The appellant then filed this service appeal on 15.06.2022 which appears to be within time and is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee and security within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 17.8.2022 before S.B.



(Kalim Arshad Khan)  
Chairman

17.08.2022

Appellant in person present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up for reply/comments 10.10.2022 before S.B.



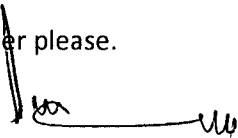

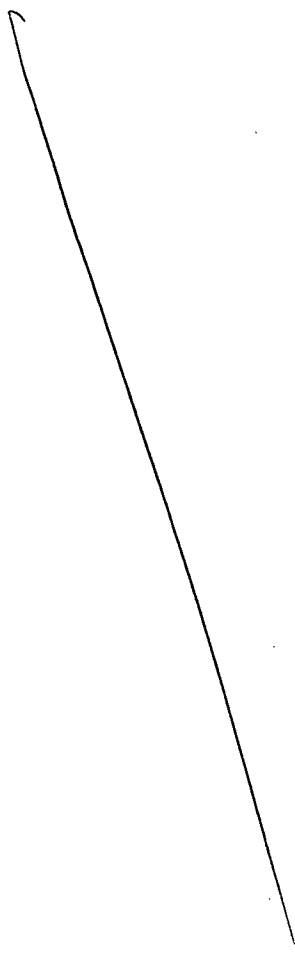
(Mian Muhammad)  
Member (E)

Form- A

FORM OF ORDER SHEET

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

Case No.- 934/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/06/2022	<p>The appeal of Mr. Tariq Hayat resubmitted today by Mr. Muhammad Javed Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	23.6.22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>24-6-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p> 

The appeal of Mr. Tariq Hayat Ex-PASI No. 504 received today i.e. on 15.06.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of departmental appeal is not attached with the appeal which may be placed on it.

No. 2030 /S.T,

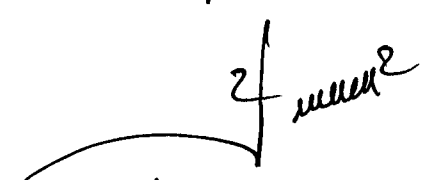
Dt. 16/6 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Javed Iqbal Gulbella Adv. Pesh.

Respected Sir,

objection removed, resubmitted after  
necessary completion.

  
Javed Iqbal Gulbella  
ASC

*Annexure D*

GOVERNMENT OF THE NORTH-WEST FRONTIER PROVINCE  
HEALTH DEPARTMENT.

24

NOTIFICATION

~~Annexure~~

~~21~~

*Peshawar, dated the 11.10.2008.*

No. SOHC/S/14-20/08.-In exercise of the powers conferred by section 26 of the North West Frontier Province Civil Servants Act, 1973 (N.-W.F.P. Act XVII of 1973), the Governor of the North-West Frontier Province is pleased to make the following rules, namely:

THE NORTH-WEST FRONTIER PROVINCE  
HEALTH (MANAGEMENT) SERVICE RULES, 2008.

PART-I  
GENERAL

1. Short title and commencement.---(1) These rules may be called the North-West Frontier Province Health (Management) Service Rules, 2008.

(2) They shall come into force at once.

2. Definitions.---In these rules, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them, that is to say:-

- (a) "appointing authority" in relation to a post, means the respective authority specified in para 4 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989;
- (b) "Commission" means the North-West Frontier Province Public Service Commission;
- (c) "Cadre" means Health Management Cadre;
- (d) "Government" means the Government of the North-West Frontier Province;
- (e) "Governor" means the Governor of the North-West Frontier Province;
- (f) "Initial recruitment" means appointment made otherwise than by promotion or transfer;
- (g) "Member of Service" means officer belonging to health management cadre as reflected in schedule I, II & III;
- (h) "PHSA" means Provincial Health Services Academy;

*A*

*or*  
**ATTESTED**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

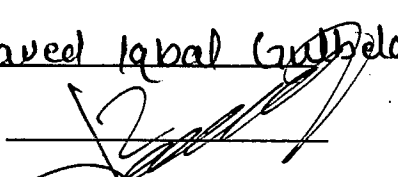
**CHECK LIST**

Case Title: Tariq Hayat v/s ILP & Others.

S#	CONTENTS	YES	NO
1	This Appeal has been presented by _____		
2	Whether counsel / appellants/ respondents/ deponents have signed the requisite document?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent oath commissioner?	✓	
8	Whether Appeal / Annexures are properly paged?	✓	
9	Whether Certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/ clear?	✓	
13	Whether copy of appeal is delivered to AG/ DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by Petitioner/ Appellant / Respondents?	✓	
15	Whether number of referred cases given are correct?	✓	
16	Whether appeal contains cutting / overwriting?		✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this Court?	✓	
19	Whether requisite number of spare copies are attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether security and process fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, Notice along with copy of Appeal and annexures has been sent to Respondents? On _____		
26	Whether copies of comments / reply / rejoinder submitted? On _____		
27	Whether copies of comments/ reply/ rejoinder provided to opposite party? On _____		

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

Name:- Javed Iqbal Gulbela

Signature: - 

Dated: - 19-06-2022

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR**

In S.A No. 934 /2022

Tariq Hayat

**VERSUS**

Inspector General of Police, Khyber Pakhtunkhwa & Others

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6	Copies of the Suspension Order No. I71-76/PA-NOWSHERA Dated: 02-02-2022, Copies of disciplinary action.	E, F	20-21
7	Copies of the Charge-Sheet, Copy of complaint, Inquiry report	G, H & HI	22-24
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Dated: 14-06-2022

Appellant

Through

Javed Iqbal Gulbela  
Advocate Supreme Court,  
Pakistan

1

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR

In S.A No. 934 /2022

Tariq Hayat (Ex-PASI No. 504) S/o Hayat Khan, R/o Police Department  
Khyber Pakhtunkhwa.

..... *APPELLANT*

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa.
2. Regional Police Officer, Mardan.
3. District Police Officer, Nowshera.

..... *RESPONDENTS*

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
ACT -1974 AGAINST THE IMPUGNED ORDER NO. 276-81/PA-NOWSHERA  
DATED: 10-02-2022 OF THE OFFICE OF DISTRICT POLICE OFFICER,  
NOWSHERA, WHEREBY THE APPELLANT WAS DISMISSED FROM  
SERVICE AND, AND THE IMPUGNED ORDER NO. 3829/ES- MARDAN  
DATED: 31-05-2022 OF THE REGIONAL POLICE OFFICER MARDAN  
WHEREBY APPEAL AGAINST THE IMPUGNED DISMISSAL ORDER WAS  
TURNED DOWN IN A CLASSICALLY CURSORY AND WHIMSICAL  
MANNER.

Respectfully Sheweth,

1. That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and hails from a respectable family.
2. That the Appellant was appointment as a PASI against the Shuhada Sons' Quota, back in the year 2015, and since the very onset of his appointment, the Appellant began to burn the candles at both ends, working blood & sweat to serve under the mandate of the Prestigious Department. Throughout the course of his service, the Appellant remained most devout & devoted fellow in duty, who never failed to prove his mental wetted skills, vigilance, and potential for rendering meritorious services, by his strict adherence to high moral standards & sense of duty, which ultimately carved out ways for winning the hearts of his high-up's and so was appraised & appreciated on numerous junctures for his work ethic, attitude & behavior even in a very lesser time of service. (Copy of Advertisement & Appointment Order is annexed here as Annexure "A & B")

3. That to shed light on track-record of the Appellant, one would certainly be amazed & inspired by the innumerable achievements that the Appellant has up his sleeve, whether it was any training course or the official annual report of the Respondent Department for the Appellant's performance; the Appellant had excelled & outshone every stage & aspect of his duty with grace and glory. **(Copies of the Operations Report & ACR is annexed here as Annexure "C, D, D/I, D/2" respectively)**
  
4. That while the Appellant was rooting for a distinctive career, & his nose was on grindstone for duty, little did he know the tragedy awaited him. As it was in the backdrop of the earlier days of February 2022, while he was posted as I/C PP Tariq Abad, Nowshehra and performing his duties with zeal & zest, when the Respondent Department dropped a bombshell on Appellant that his services were suspended from the rolls of the Respondent Department vide **Order No. 171-76/PA-NOWSHERA Dated: 02-02-2022**, on the grounds of his involvement in alleged immoral activities & nefarious conducts upon a miscellaneous complaint made by a local folk named Afaq. **(Copies of the Suspension Order No. 171-76/PA-NOWSHERA Dated: 02-02-2022 & Disciplinary Action are here as Annexure "E, F ")**
  
5. That followed by the supra-mentioned events, a Charge-Sheet was served upon the Appellant, whereby he was alleged to be guilty of misconduct under Police Rules 1975 and so shall the Appellant submit a written reply to the Charge-Sheet within 7 days so to implore his personal defense. Hence, the Appellant followed the directions rendered upon him and within the prescribed time filed his written defense. **(Copies of the Charge-Sheet & Inquiry Report is annexed here as Annexure "G, H & HI")**
  
6. That what to say of a let-down, the Appellant was taken at shock & disbelief that the Respondent Department all acting up in hissy haste & rush, served the Appellant with the **Impugned Dismissal Order vide Order No. 276-8I/PA-NOWSHERA Dated: 10-02-2022**, outright within no time, & that too without the fulfillment of the due procedure of law that was to conduct regular/mandatory inquiry, and where the Appellant was to be given an opportunity to depose, put up defense and to rebut all the false accusations



levelled against him. (Copies of the Impugned Dismissal Order No. 276-8I/PA-NOWSHERA Dated: 10-02-2022 is annexed here as Annexure "I")

7. That the Appellant highly aggrieved from the Impugned Dismissal Order Dated: 10-02-2022, filed a Departmental Appeal to the Regional Police Officer, Mardan, but to an utter dismay that too was dismissed in haste. (Copies of the Departmental Appeal & Impugned Order No. 3829/ES MARDAN Dated: 31-05-2022 is annexed here as Annexure "J,K ")
8. That feeling highly aggrieved, the Appellant approaches this Hon'ble Tribunal for setting aside both the Impugned Dismissal as well as Appellate Authority's Orders upon the following grounds, inter-alia:

GROUNDS:

- A. That the Impugned Dismissal Order of the Respondent Department holds no water or grounds to impose a major penalty upon the Appellant as it is unwarranted, unlawful & *void-ab initio*, hence not sustainable at all.
- B. That it is an established principle of law that "if a Statute requires a thing to be done in a particular way or manner, it must be done by the Authority in the manner as prescribed by the Statute, else departure from the Rules will invalidate the thing done (in the present case; the dismissal of the Appellant) in the manner of other than the prescribed by the Rules".
- C. That the Impugned Order issued by the Respondent Department is based on & supported by clandestine and covert proceedings that taken place without any Show-Cause, Notice or even any Final Show-Cause Notice to Appellant. But as a matter of fact, the nature & conduct of departmental inquiry is never a confidential matter & record must show involvement and association of the Accused person with commissioned misdeeds, and the participation of the Accused in the same enquiry is a *sine qua non*, as it is the first stage of judicial proceedings and for a reason, it shall be conducted strictly in accordance with requirement of law & not whimsical manner.
- D. That by inviting a reference from a reported citation *1999 PLC(CS) 423*, as per law, "*in case of any major penalty proposed to be imposed on an accused civil servant for serious allegations, which are denied by the employee, the regular enquiry is mandatory to be conducted, providing such employee an opportunity of cross-examining the witness against him as also allowing him to put up his defense*", but in the present case, it is crystal clear that the Respondent Department had an evident departure from the due procedure of law, whereby no regular inquiry was conducted to probe into the allegations levelled against the Appellant.
- E. That awarding a major penalty to an employee without lending him any opportunity of personal hearing or defense, or digging into the matter without any inquiry, but merely based on so-called discreet & detached accusations



and charge-sheeting the employee with bare allegations/charges, is nothing but a naked assault on the fundamental rights of the Appellant.

- F. That the principle of natural justice i.e., *audi alteram partem* applies to judicial as well as quasi-judicial & non-judicial proceedings too, which pertains to a conclusion that an order without a notice is always void, and any proceedings beyond that would also be void, defected, and militated against the principles. Hence, it is safe to say that in the instant case, the violation of provisions of law was equated with the violation of principle of natural justice & the actions of the Respondent Department taken in the violation of the above-cited pillars of the legal system are without any lawful authority, having no legal effect, and rendering every right to Appellant to assail the Impugned Dismissal Order.
- G. That from every angle the appellant is liable to be re-instated into service with all back benefits.
- H. That any other ground not raised here may graciously be allowed at the time of arguments.

*It is therefore, most humbly prayed that on acceptance of the instant Appeal, the Impugned Order No. 276-81/PA-NOWSHERA dated: 10-02-2022 of the office of District Police Officer, Nowshera, and of the Impugned Order No. 3829/ES-MARDAN Dated: 31-05-2022 of the Regional police Officer, Mardan, may kindly be set aside & by doing so the Appellant may very graciously be re-instated into service with all the back benefits.*

*Any other relief not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.*

Dated: 14-06-2022

Appellant  2.  
Through  
Javed Iqbal Gulbela  
Advocate, Supreme Court of Pakistan.  
Saghir Iqbal Gulbela  
&  
Ahsan Saridar   
Advocates, High Court  
Peshawar.

**NOTE:**

No such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

 2.  
Advocate.

5

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

In Service Appeal No- \_\_\_\_\_/2022

Muhammad Tariq Hayat

Versus

IG KPK & Others


**AFFIDAVIT**

I, Muhammad Tariq Hayat S/o Hayat Khan R/o Mubarak Shah Korona P/O Khaishki Payan, Khaishki Bala Tehsil & District Charsadda, do hereby solemnly affirm & declare on oath that all contents of the instant Service Appeal are true & correct to the best of my knowledge and belief & nothing has been concealed from this Hon'ble Tribunal.

  
DEPONENT

Identified By:

Javed Iqbal Gulbela  
Supreme Court  
of Pakistan

  
13-6-22

6

BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR

In S.A No. \_\_\_\_\_/2022

Tariq Hayat

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa & Others

ADDRESSES OF PARTIES

APPELLANT:

Tariq Hayat (Ex-PASI No. 504) S/o Hayat Khan, R/o Police Department Khyber  
Pakhtunkhwa.

RESPONDENTS:

1. Inspector General of Police, Khyber Pakhtunkhwa.
2. Regional Police Officer, Mardan.
3. District Police Officer, Nowshera.

Dated: 14-06-2022

Through

Appellant

Javed Iqbal Gulbena  
Advocate Supreme Court,  
Pakistan

**تعمیرات کے مسائل**  
**انعام اللہ علیہ**  
 ...

...  
 ...

**خاندان اٹکاچی**  
**مارنے والوں کیلئے**  
**سوالیہ نشان**  
 ...



...  
 ...

**فہرست و انصاف**

**تعمیرات کے مسائل**  
**انعام اللہ علیہ**  
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**تعمیرات**

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JAVABD IABAL GULBELA  
 Advocate  
 Supreme Court of Pakistan  
 (P.S.U. # 2217)

(8)

Ann: B

**Government of Khyber Pakhtunkhwa**  
Office of the Deputy Inspector General of Police  
Mardan Region-I, Mardan

Phone No. 0937-9230113, Fax No. 0937-9230115.

From: The Deputy Inspector General of Police,  
Mardan Region-I, Mardan.

To: All DPOs, in Mardan Region-I, Mardan.

No. 407-10/ES.

12, January, 2016.

Subject: APPOINTMENT/ABSORPTION OF POLICE SHUHADA'S SONS/BROTHERS AS PASIS IN POLICE DEPARTMENT (KHYBER PAKHTUNKHWA) OF MARDAN REGION.

Memo:

Having been approved by the Departmental Selection Committee, appointment/absorption of the following Police Shuhada's Sons/Brother's as Assistant Sub Inspectors (BPS-09) (8015-495-22865) in Police Department (Khyber Pakhtunkhwa) on 03 years probation period, against the Supernumerary Posts in the light of directions vide Central Police Office, Peshawar letter No. 8905-8935/A-3 dated 17.09.2015 subject to the condition that, their appointment/absorption will be on temporary basis, and verification of their educational degree/certificates. Moreover if the degree/certificates of any candidate found forged, shall be immediately discharged: -

On the appointment/absorption of the following Shuhada's Sons/Brothers, they are also allotted Regional Numbers with posting to their parent Districts noted against each their names:-

Advocate  
Supreme Court of Pakistan  
(AGC # 5317)

S. No.	Name & No.	Appointment /Absorption	Date of Shahadat of Father/Brothers	Region No.	District
1.	Muhammad Behzad S/o Shaheed FC Shah Fazil	Newly appointed	25.03.1992	435/MR	Swabi
2.	FC Azam Khan S/o Shaheed ASI Jansher Khan	Absorbed	14.11.1992	436/MR	Mardan
3.	Saddam Hussair S/o Shaheed FC Jan Alam	Newly appointed	22.01.1994	437/MR	Charsadda
4.	Khalid Ahmad S/o Shaheed FC Noor Hayat	Newly appointed	19.02.1994	438/MR	Swabi
5.	FC Kifayat Ullah S/o Shaheed FC Karim Ullah	Absorbed	14.10.1994	439/MR	Mardan
6.	Abdullah Jan s/o Shaheed Constable Wali Muhammad	Newly appointed	14.10.1994	440/MR	Mardan
7.	Imad Khan S/o Shaheed FC Jehan Zeb No. 105	Newly appointed	01.08.1995	441/MR	Charsadda
8.	Kamran Nadir S/o Shaheed Gul Nadir	Newly appointed	05.09.1995	442/MR	Charsadda
9.	Sahar Gul S/o Shaheed FC Nowsherwan	Newly appointed	10.04.1996	443/MR	Charsadda
10.	FC Muhammad Asif s/o LHC Yousaf Khan	Absorbed	30.04.1996	444/MR	Nowshera
11.	FC Adnan Khan S/o Shaheed FC Said Qamar No. 983	Absorbed	12.07.1996	445/MR	Mardan
12.	Muhammad Bilal S/o Shaheed FC Muhammad Iavid	Newly appointed	18.08.1996	446/MR	Swabi

3/No. 78  
14/1/016

13.	Muhammad Zeeshan S/o Shaheed FC Sardar Muhammad	Newly appointed	14.04.1998	447/MR	Mardan
14.	FC Farhad Ali Shah S/o Shaheed IHC Mukamil Shah	Absorbed	22.08.1999	448/MR	Charsadda
15.	Bilal S/o Shaheed FC Shahzada	Newly appointed	01.05.2001	449/MR	Charsadda
16.	FC Tahir Rasool s/o Shaheed Constable Hazrat Rasool	Absorbed	10.05.2001	450/MR	Mardan
17.	FC Nasir Khan S/o Shaheed HC Laiq Shah	Absorbed	17.03.2002	451/MR	Swabi
18.	FC Shah Faisal No. 1842 B/o Shaheed FC Shad Muhammad No. 959	Absorbed	22.02.2003	452/MR	Mardan
19.	Muhammad Bashir S/o Shaheed SI Husan Zada	Newly appointed	22.02.2003	453/MR	Swabi
20.	FC Aimal Zeb No. 149 S/o Shaheed ASI Jehan Zeb Khan	Absorbed	27.09.2005	454/MR	Nowshera
21.	FC Zulfiqar Ali S/o Shaheed FC Muhammad Sher No. 2929	Absorbed	28.03.2006	455/MR	Mardan
22.	Ali Raza S/o Shaheed ASI Noorulali	Newly appointed	02.04.2006	456/MR	Charsadda
23.	Muhammad Shahzad S/o Shaheed HC Wisal Muhammad	Newly appointed	21.05.2006	457/MR	Swabi
24.	Abdul Latif B/o Shah Khalid No. 277	Newly appointed	27.01.2007	458/MR	Nowshera
25.	FC Akhtar Munir No. 1107 B/o Shaheed FC Muhammad Zubair No. 1061	Absorbed	14.06.2007	459/MR	Nowshera
26.	Zahid Shah S/o Shaheed FC Hidayat Shah	Newly appointed	05.07.2007	460/MR	Charsadda
27.	Sohail Nasir S/o Shaheed DSP Saleem Dad Khan	Newly appointed	02.02.2008	461/MR	Mardan
28.	Sheraz Afzal S/o Shaheed FC Afzal Shah	Newly appointed	23.02.2008	462/MR	Nowshera
29.	FC Shah Faisal S/o Shaheed FC Qaisar Khan	Absorbed	16.03.2008	463/MR	Mardan
30.	FC Tauseef Ahmad 1204 S/o Shaheed FC Farukh Said	Absorbed	25.04.2008	464/MR	Mardan
31.	Waqas Ahmad S/o Shaheed FC Israr Khan	Newly appointed	17.08.2008	465/MR	Charsadda
32.	FC Adil Khan s/o Shaheed HC Amjid Ali	Absorbed	22.08.2008	466/MR	Mardan
33.	Ashfaq Ali B/o Shaheed Adil Ali No. 1514	Newly appointed	31.10.2008	467/MR	Mardan
34.	FC Attiq-ur Rehman B/o shaheed FC Arif Shah	Absorbed	04.11.2008	468/MR	Mardan
35.	Shahab B/o Shaheed FC Taimoor Khan No. 2129	Newly appointed	06.01.2009	469/MR	Mardan
36.	Imran B/o Shaheed FC Fazal Rahman	Newly appointed	07.01.2009	470/MR	Mardan
37.	Abid Ali S/o Shaheed FC Usman Ali	Newly appointed	08.02.2009	471/MR	Swabi
38.	Izaz Ali S/o Shaheed HC Muhammad Taj No. 54	Newly appointed	24.03.2009	472/MR	Swabi
39.	JC Zaher Muhammad B/o Shaheed FC Naseer Muhammad	Absorbed	26.03.2009	473/MR	Mardan
40.	Taimoor Ahmad S/o Shaheed DSP Bahadar Khan	Newly appointed	15.04.2009	474/MR	Charsadda
41.	Kamran Zeb S/o Shaheed ASI Aurangzeb	Newly appointed	20.04.2009	475/MR	Charsadda
42.	FC Shakeel B/o Shaheed FC Siyar No. 4763/FRP	Absorbed	11.05.2009	476/MR	Swabi
43.	Muhammad Kashif S/o Shaheed FC Fazal Subhan No. 593	Newly appointed	20.05.2009	477/MR	Charsadda
44.	FC Zeeshan No. 23 S/o Shaheed FC Musharaf	Absorbed	04.06.2009	478/MR	Mardan
45.	Mazhar Fawad S/o Shaheed Inspector Fazal Khanan	Newly appointed	04.06.2009	479/MR	Mardan

6816 78  
4/11/11

46.	FC Bahar Ali B/o Shaheed FC Farman Ali No. 1095	Absorbed	12.08.2009	480/MR	Charsadda
47.	Kashif B/o Shaheed FC Nasir	Newly appointed	01.10.2009	481/MR	Mardan
48.	FC Nihar Ali S/o Shaheed SI Gul Imran	Absorbed	24.10.2009	482/MR	Mardan
49.	FC Asif Ayaz No. 2801 B/o Shaheed FC Muhammad Ayaz	Absorbed	11.03.2010	483/MR	Mardan
50.	FC Atta Ullah No. 989 B/o Shaheed FC Alamgir	Absorbed	14.06.2010	484/MR	Mardan
51.	Taj Islam S/o Shaheed Muhammad Ishaq	Newly appointed	06.07.2010	485/MR	Mardan
52.	FC Naveed ur Rehman s/o Shaheed SI Khushdil Khan	Absorbed	07.09.2010	486/MR	Swabi
53.	Syed Ali Shah B/o FC Shaheed Syed Kamal Shah No. 1298	Newly appointed	13.12.2010	487/MR	Mardan
54.	FC Izhar Ahmad No. 1401 B/o Shaheed FC Wiqar Ahmad & Shaheed ASI Mukhtiar Ahmad	Absorbed	15.03.2011 18.01.2007	488/MR	Mardan
55.	FC Muammar Shah B/o Shaheed Inspector Mazhar Shah	Absorbed	15.03.2011	489/MR	Charsadda
56.	Syed Adil Badshah B/o shaheed FC Syed Usman Badshah	Newly appointed	16.04.2011	490/MR	Mardan
57.	FC Shah Khalid B/o Shaheed Kausar Ali	Absorbed	22.04.2011	491/MR	Charsadda
58.	Mujeeb Alam B/o Shaheed FC Sardar Alam No. 381	Newly appointed	25.05.2011	492/MR	Charsadda
59.	FC Mujeeb ur Rehman B/o Shaheed Niaz ur Rehman No. 130	Absorbed	25.05.2011	493/MR	Charsadda
60.	Saddam Hussain S/o Shaheed LHC Mir Wali	Newly appointed	16.07.2011	494/MR	Swabi
61.	Ikram Khan B/o Shaheed LHC Ayaz Khan	Newly appointed	12.11.2011	495/MR	Mardan
62.	Muhammad Adil S/o Shaheed LHC Ali Zar	Newly appointed	17.03.2012	496/MR	Swabi
63.	FC Shahid Hussain B/o Shaheed FC Shah Hussain	Absorbed	12.05.2012	497/MR	Mardan
64.	Saddam Ali B/o Shaheed FC Kashif Ali	Newly appointed	09.06.2012	498/MR	Swabi
65.	FC Shah Naam B/o Shaheed FC Noorul Islam	Absorbed	19.07.2012	499/MR	Mardan
66.	Murshed Alam S/o Shaheed SP Khurshid Alam	Newly appointed	14.10.2012	500/MR	Charsadda
67.	Wahab Ali Shah S/o Shaheed Tajamul Shah	Newly appointed	03.12.2012	501/MR	Mardan
68.	FC Waseem Iqbal S/o Shaheed HC Arshed Iqbal of Special Branch	Absorbed	18.02.2013	502/MR	Swabi
69.	FC Nasir Khan B/o Shaheed Azmat Jan	Absorbed	19.02.2013	503/MR	Charsadda
70.	Muhammad Tariq Hayat B/o Shaheed Abdul Nasir	Newly appointed	23.02.2013	504/MR	Nowshera
71.	Adnan Ahmad S/o Shaheed HC Islam Gul	Newly appointed	26.03.2013	505/MR	Mardan
72.	Adnan Khan S/o Shaheed SI Gharib Ullah	Newly appointed	16.07.2013	506/MR	Nowshera
73.	FC Muhammad Qasim s/o Shaheed ASI Fazal Wahab	Absorbed	20.10.2013	507/MR	Mardan
74.	Zeeshan S/o Shaheed FC Iftikhar Ahmad	Newly appointed	13.12.2013	508/MR	Swabi
75.	Jehan Ali B/o Shaheed FC Nawaz Ali	Newly appointed	12.01.2014	509/MR	Swabi
76.	FC Naveed Iqbal No. 809 S/o Shaheed Muhammad Iqbal	Absorbed	14.01.2014	510/MR	Nowshera
77.	FC Bilal Ahmad B/o Shaheed LHC Khwaja Muhammad	Absorbed	22.01.2014	511/MR	Charsadda
78.	Amir Khan S/o Shaheed Sabir Khan No. 738	Newly appointed	24.01.2014	512/MR	Swabi

78  
14/1/18/06



79	Ishtiaq Ahmad B/o Shaheed FC Ashfaq Ahmad	Newly appointed	15.02.2014	513/MR	Charsadda
80	Fakhar Yar Khan S/o Shaheed FC Shehryar Khan	Newly appointed	25.05.2014	514/MR	Charsadda
81	Taufiq Khan S/o Shaheed SI Khan	Newly appointed	20.06.2014	515/MR	Charsadda
82	Asad Khan B/o Shaheed FC Alam Khan No. 2000	Newly appointed	23.07.2014	516/MR	Charsadda

Necessary notification, regarding their appointment/ absorption may please be issued subject to their medical fitness and verification of character/ antecedent.

En: (B) Application's File.

(MUHAMMAD SAEED)PSP  
Deputy Inspector General of Police,  
Mardan Region-I, Mardan.

No. / ES.

Copy to Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar for favour of information w/r to his office, Memo: Nos. 4016-22/E-III dated 31.12.2015 & 134-66/E-III dated 11.01.2016.

(MUHAMMAD SAEED)PSP  
Deputy Inspector General of Police,  
Mardan Region-I, Mardan.

EC  
Signature  
14-1-2016

(OB No. 78  
dt 14.1.2016)

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

Office of the DPO Nowshera

No. 747 SI IE dt 15/01/2016

Copy for n/ocd to the:

- 1) SP Investigation
- 2) DAO. Nowshera
- 3) Accountant
- 4) OHC
- 5) FME

OL

District Police Officer  
Nowshera

15 (12) روزنامہ 1/01/16

18

= 0 =

15 1/01/16 طرہ ارسال سے 11:00 بجے

1. حضرت خواجہ مسلمان (1) 2. آصف (2) 3. حضرت خواجہ

4. عبداللطیف (5) 6. طارق بیات (8) 7. عدنان

8. اعلیٰ زینب (6) طارق بیات (8) عدنان (9) 10. FS 407-10 شمارہ

12-1-016 دیوٹی کے لئے

دیوٹی کے لئے دیوٹی کے لئے دیوٹی کے لئے

فہم

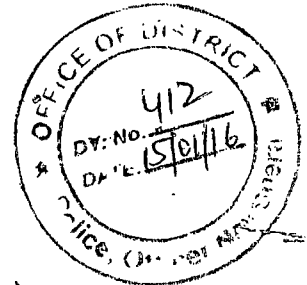
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Sir, FORWARDED PLS

RI. PL. NOWSHERA

15-01-2016



EC  
Fazila

Handwritten signature and date 15-1-2016

ABDUL GULBELA  
Advocate  
Sessions Court of Pakistan  
(ASCP 1951)

13

Am C

Police No.99 S&PD, NWFP, 1559 F.S. 500P. of 100-9-12-1990-(02)

POLICE DEPARTMENT No. 11-12 DISTRICT NOWSHERA

Annual Confidential Report on the working of Assistant Sub-Inspector, Sub-Inspectors and Inspectors for the year ending 31<sup>st</sup> December, 2020.

Name, Provincial or Range No.	PASI Tariq Hayat No. 504/MR
Father's Name	Hayat Khan
Where and on what duties Employed during the past 12 Months	01.01.2020 to 20.03.2020, Police Lines, 21.03.2020 to 11.08.2020, PS, Pabbi, 12.08.2020 to 15.10.2020, PS, Nizampur, 16.10.2020 to 31.12.2020, I/C PP Shekani.

Class of Superintendent of Police's Report, i.e. "A" "B" or "C" "A"

Is he honest? Yes

Remarks by:

1. Superintendent of Police,
2. Regional Deputy Inspector General of Police.

01.01.2020 to 20.03.2020  
Period less than 03 months.  
*Duty Free Officer*  
*Gulshed Khan*  
(GUL SHED KHAN)  
Deputy Superintendent of Police,  
HQs, Nowshera  
06.04.2020 to 11.08.2020 & 15.10.2020 to 31.12.2020

*Tayyab Jan*  
(TAYYAB JAN)  
Deputy Superintendent of Police,  
Circle Pabbi  
01.01.2020 to 12.06.2020

*Kashif Zulfiqar*  
(KASHIF ZULFIQAR) PSP  
District Police Officer,  
Nowshera  
13.06.2020 to 01.12.2020

*Najmul Hasnain Liaquat*  
(NAJMUL HASNAIN LIAQUAT) PSP  
District Police Officer,  
Nowshera

**ARRESTED**  
*[Signature]*  
*[Signature]*

**POLICE DEPARTMENT**

**NOWSHERA DISTRICT**

**No. 12.38 (1)  
(PERSONAL FILE)**



1. Name & Designation PASI Muhammad Tariq Hayat No.
2. Father's name & profession Hayat Khan
3. Religion and caste Islam/Afghan
4. Residence (village Mubarak Shah Korona Kheshti Bala, PO Mashti Hayat  
Teh: & District Nowshera)  
(Police Station Risalpur)  
(District Nowshera)
5. Date of birth 01.02.1987
6. Height and Chest measurement 5'8" 34" x 35"
7. Where educated with name of School or Schools, statement of education qualification passed BA
8. Any other qualification? Did the officer belong to his School Cricket Eleven or Foot ball or Hockey Team? Cricket
9. Names and degree of relationship of & appointment held by relatives in Govt or other employee Nil
10. Home of family Mubarak Shah Korona Kheshti Bala, Tehsil & District  
Nowshera
11. Full particulars of family including a brief statement of special services rendered to Govt: If any Nil

District Police Officer,  
Nowshera.

Countersigning by Higher Officer

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC #3317)

*San Ahmad*  
Regional Police officer,  
Mardan

«D» Arm

15

2021 01/06  
 03 = 55/09  
 03 = 107/15  
 23 = Pass

2021 01/06  
 03 = 55/09  
 03 = 107/15  
 23 = Pass

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 03 = 107/15  
 23 = Pass

2021 01/06  
 03 = 55/09  
 03 = 107/15  
 23 = Pass

2021 01/06  
 03 = 55/09  
 03 = 107/15  
 23 = Pass

Handwritten signature and notes in Arabic, including the name 'MAMSIK' and the date '6.6.2021'.

## گرفار شدہ مجرمان اشتہاری طارق حیات PASI سابقہ انچارج چوکی طارق آباد

تعداد نو شہرہ کلاں

عرصہ 16.11.2021 تا 02.02.2022

Printed by: - daulturk

نمبر شمار	علت	موزخہ	جرم	تھانہ	نام، ولدیت، سکونت PO	APO نمبر	گرفار کنندہ آفیسر
1	162	13.05.2013	489-F	اسلام آباد	نور اسلام ولد محمد جاوید سکند ماگی شریف	-	طارق حیات PASI 25.11.2021
2	666 684 500	13.07.2009 19.07.2009 31.05.2009	13AO 13AO 13AO	کلاں	دبیر خان ولد گل نواز خان سکند ماگی شریف	933	طارق حیات PASI 28.01.2022
3	89	27.01.2022	337F(ii)-34	کلاں	محمد جنید ولد اشفاق احمد سکند ماگی شریف	-	طارق حیات PASI 30.01.2022
4	89	27.01.2022	337F(ii)-34	کلاں	محمد طیب ولد اشفاق احمد سکند ماگی شریف	-	طارق حیات PASI 30.01.2022
5	617 617	29.11.2014 14.05.2021	506-148-149 506-148-149	کلاں	سلمان ولد اورنگزیب سکند ماگی شریف	-	طارق حیات PASI 30.01.2022
6	636	11.08.2020	337A(ii)/148/149	کلاں	شاد زبیب ولد عالمزیب سکند بدر شی خیل ماگی شریف	930	طارق حیات PASI 30.01.2022
7	93	29.01.2022	PPC 324.34.429	کلاں	سمن شاہ ولد افضل شاہ سکند ماگی شریف		مجرمان کو موقع پر ہی طارق حیات PASI نے گرفتار کیا۔
	93	29.01.2022	PPC 324.34.429	کلاں	سہادت شاہ ولد محمد حسن شاہ سکند ماگی شریف		
8	93	29.01.2022	PPC 324.34.429	کلاں	اسلم شاہ ولد محمد حسن شاہ سکند ماگی شریف		

SAVED IGBAL GULBEELA  
Advocate  
Supreme Court of Pakistan  
(ASC# 53171)  
(SC# 5317)

MNET

17

ental enquiry initiated and  
MR, that he

ضلع نوشہرہ

تہانہ نوشہرہ کلاں

02.02.2022 تا 16.11.2021 عرصہ PASI طارق حیات پراگرس

55/109	107/151
15 نفر (سال 2022)	32 نفر

MOHAMMAD I. GULBELA  
Advocate  
District Court of Rahimyar Khan  
(ASC # 5317)

درج شدہ مقدمات بہ مدعیت طارق حیات PASI سابقہ ایچ جی طارق آباد عرصہ 16.11.2021 تا 02.02.2022

اسلم = 20 منشیات = 02 لوکل / دیگر = 22

نمبر شمار	مقدمہ عدالت	مورخہ	جرم	نام مدعی	نام، ولدیت، سکونت ملوث ملزم / ملزمان
1.	1483	23.11.2021	15AA/188	طارق حیات PASI	جان محمد ولد خان محمد سکندہ بچین کاندے
2.	1496	26.11.2021	15AA	طارق حیات PASI	ضیاء الرحمن ولد ملک امان سکندہ شاہ منصور صوابی
3.	1506	27.11.2021	15AA	طارق حیات PASI	صادق خان ولد شوکت خان سکندہ ماگی شریف
4.	1511	28.11.2021	15AA	طارق حیات PASI	اسلام خان ولد بہرام خان سکندہ ماگی شریف
5.	1522	02.12.2021	11 BCNSA/15AA	طارق حیات PASI	رحمت اللہ ولد سید اکبر سکندہ شنواری حال ماگی شریف
6.	1533	05.12.2021	15AA/188	طارق حیات PASI	لیاقت علی خان ولد عجب خان سکندہ چپ خشک بچین کاندے
7.	1538	05.12.2021	15AA	طارق حیات PASI	اسٹیل ولد ہارون الرشید سکندہ نیو ڈاگی ٹیل نوشہرہ کلاں
8.	1554	10.12.2021	15AA	طارق حیات PASI	میراد خان ولد ثار خان سکندہ ماگی شریف
9.	1558	12.12.2021	15AA/188	طارق حیات PASI	وسیم حیدر ولد منیر حیدر سکندہ بی حال آرمر کالونی
10.	1562	13.12.2021	15AA	طارق حیات PASI	ذوہیب احمد ولد زاہد احمد سکندہ ماگی شریف
11.	1587	22.12.2021	11B CNSA	طارق حیات PASI	عبداللہ ولد قیمت خان سکندہ خیسرے
12.	1599	23.12.2021	12 SVEP KPK	طارق حیات PASI	نوید ولد فرید سکندہ منگلی مصری بانڈہ
13.	1602	23.12.2021	15AA	طارق حیات PASI	آفاق ولد نواب علی سکندہ بدر شی
14.	1612	26.12.2021	15AA	طارق حیات PASI	صوبیدار ولد ناصر خان سکندہ افغانستان حال آرمر کالونی
15.	1619	28.12.2021	10RBA	طارق حیات PASI	فتح اللہ ولد مومین خان سکندہ تحصیل الپوری شانگدہ حال آرمر کالونی فیڑا
16.	1620	28.12.2021	279	طارق حیات PASI	لعل محمد ولد نواب خان سکندہ نواس کے نوشہرہ کلاں
17.	1621	28.12.2021	279	طارق حیات PASI	عادل خان ولد شہباز گل سکندہ شینے
18.	1647	31.12.2021	15AA	طارق حیات PASI	PO جان محمد ولد شاہ زمان سکندہ ماگی شریف
19.	12	05.01.2022	10RBA	طارق حیات PASI	صدیق اللہ ولد محمد سعید سکندہ افغانستان حال ماگی شریف
20.	13	05.01.2022	10RBA	طارق حیات PASI	جمیل الرحمن ولد حاجی سید شاہ سکندہ افغانستان حال ماگی شریف
21.	20	07.01.2022	10 RBA	طارق حیات PASI	جان ولی شاہ ولد لگی شاہ سکندہ کالنگہ حال آرمر کالونی
22.	24	09.01.2022	10 RBA	طارق حیات PASI	نظر سید ولد کنیر سکندہ مہندہ حال ماگی شریف
23.	25	10.01.2022	10RBA	طارق حیات PASI	ابراہیم ولد اختر جان سکندہ افغانستان حال ماگی شریف
24.	29	11.01.2022	10 RBA	طارق حیات PASI	نادر خان ولد اکبر خان سکندہ ساکوٹ حال ماگی شریف
25.	30	11.01.2022	15AA	طارق حیات PASI	نجیب ارمان ولد عبد ازیق سکندہ ماگی شریف
26.	37	12.01.2022	15AA	طارق حیات PASI	حماد حسین ولد سردار حسین کاکو سکندہ خٹ کے
27.	38	12.01.2022	10RBA	طارق حیات PASI	نور رحمان ولد شیرین سکندہ بانڈہ حال ماگی شریف
28.	46	15.01.2022	10 RBA	طارق حیات PASI	علی جان ولد اجمل سکندہ مہرائی حال ملک آباد کلاں
29.	49	16.01.2022	15AA	طارق حیات PASI	شہزاد علی ولد منیر حسین سکندہ حکیم آباد
30.	50	16.01.2022	15AA	طارق حیات PASI	کاشف حسین ولد ملتان الدین سکندہ بنگو حال نوشہرہ
31.	60	18.01.2022	10 RBA	طارق حیات PASI	امتیاز احمد خان ولد خلافت خان سکندہ شاہ کوٹ پایان
32.	63	19.01.2022	10RBA	طارق حیات PASI	جنت ولی خان ولد حکیم خان سکندہ ماگی شریف
33.	64	19.01.2022	10RBA	طارق حیات PASI	حسن خان ولد خیال زر خان سکندہ ماگی شریف

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 3011)



جنید خان ولد در محمد سکندہ پیر پانی۔	طارق حیات پاسی	15AA	21.01.2022	69	.34
شہاب ولد نذیر سکندہ پیر پانی۔	طارق حیات پاسی	15AA	21.01.2022	70	.35
شیخ اقبال دوست ولد شیخ دوست محمد سکندہ آرمر کالونی	طارق حیات پاسی	15AA	24.01.2022	82	.36
رحمان اللہ ولد عیسی سکندہ افغانستان حال ماگی شریف	طارق حیات پاسی	10 RBA	26.01.2022	85	.37
سید نبی ولد سید ولی سکندہ لوئر در حال آرمر کالونی	طارق حیات پاسی	10 RBA	26.01.2022	86	.38
واجد ولد سیف الرحمن سکندہ باڑہ حال آرمر کالونی فیر 01	طارق حیات پاسی	279	26.01.2022	87	.39
زید الامان ولد عبد اللہ سکندہ منگلی	طارق حیات پاسی	15AA- ¼ AF	26.01.2022	88	.40
دقاص خان ولد اورنگزیب سکندہ نوشہرہ کلاں حال آرمر کالونی	طارق حیات پاسی	10RBA	29.01.2022	96	.41
محمد ولی ولد زر خون خان سکندہ افغانستان حال آرمر کالونی	طارق حیات پاسی	10RBA	29.01.2022	97	.42
عبد الرحمان ولد محمد جان سکندہ اورکزئی حال آرمر کالونی	طارق حیات پاسی	10RBA	30.01.2022.	98	.43
عزیز خان ولد فیاض علی شاہ سکندہ کاکا خیل حال آرمر کالونی	طارق حیات پاسی	10RBA	30.01.2022.	99	.44

SAFED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

20

Ann "E"

OFFICE OF THE  
DISTRICT POLICE OFFICER,  
NOWSHERA

Tel No. 0923-9220102 & Fax No. 0923-9220103  
Email dpo\_nowshera.pk@yahoo.com

2022

ORDER

PASI Tariq Hayat I/C PP Tariq - bad is hereby placed under suspension and closed to Police Lines, Nowshera with immediate effect.

Charge sheet & statement of allegations will be issued against him separately.

OB No. 108

Dated 02/02 /2022.

*[Signature]*  
District Police Officer,  
Nowshera

No 171-76 IPA, dated Nowshera, the 02/02 -/2022.

Copy for information and necessary action to the:

1. ASP Cantt, Nowshera.
2. DSP FQrs: Nowshera.
3. Pay Officer.
4. Establishment Clerk.
5. FMC.
6. I/C Computer Lab.

*[Stamp]*  
DISTRICT POLICE OFFICER  
NOWSHERA

21

Ann "F"

**DISCIPLINARY ACTION**

I, Muhammad Omer Khan, PSP, District Police Officer, Nowshera as competent authority am of the opinion that PASI Tariq Hayat has rendered himself liable to be proceeded against as he committed the following acts/omissions within the meaning of Police Rules, 1975.

**STATEMENT OF ALLEGATIONS**

Whereas, PASI Tariq Hayat that he while posted as I/C PP Tariq Abad, now under suspension at Police Lines, Nowshera is reportedly involved in immoral activities, which amounts to grave misconduct on his part and rendered him liable for punishment under Khyber Pakhtunkhwa Police Rules, 1975.

For the purpose of scrutinizing the conduct of the said accused official with reference to above allegations, Mr. Bilal Ahmed, ASP Cantt, Nowshera is hereby nominated as Enquiry Officer.

The Enquiry Officer shall in accordance with the provision of Police Rules, 1975, provide reasonable opportunity of hearing to the defaulter official, record his findings and make immediate recommendations as to punish or other appropriate action against the defaulter official.

PASI Tariq Hayat is directed to appear before the Enquiry Officer on the date, time and place fixed by the Enquiry Officer.

No. 03 /PA,  
Dated 02/02/2022



*Muhammad Omer Khan*  
District Police Officer,  
Nowshera

RECEIVED  
District Police Officer,  
Nowshera

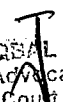
Ann 'G'

22

**CHARGE SHEET**

1. I, **Muhammad Omer Khan, PSP**, District Police Officer, Nowshera, as competent authority, hereby charge **PASI Tariq Hayat** as per Statement of Allegations enclosed.
2. By reasons of above, you appear to be guilty of misconduct under Police Rules, 1975 and have rendered yourself liable to all or any of the penalties specified in Police Rules, 1975.
3. You are, therefore, required to submit your written defense within **07 days** of the receipt of this Charge Sheet to the Enquiry Officer, as the case may be.
4. Your written defense, if any should reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
5. Intimate whether you desire to be heard in person.

  
District Police Officer,  
Nowshera

  
JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

17201-7934701-5  
 0316-9473571

JAVED GOSAL GULBELA  
 Advocate  
 Supreme Court of Pakistan  
 ASC # 53171

Handwritten Urdu text, likely a legal opinion or petition, discussing various points of law and procedure. The text is dense and covers most of the page.

Handwritten Urdu text at the bottom of the page, possibly a signature or a concluding statement.

BTMNET

24

Ann "H"

District Police Officer, Nowshera  
considered himself liable to be  
Police Rules.



OFFICE OF THE  
SUB-DIVISIONAL POLICE OFFICER,  
Cantt CIRCLE

Tel: 0923-9220108, E-Mail: sdpnsrccantt@gmail.com

No. 01 /ST, Dated: 9 /02/2022.

3

To: The District Police Officer  
Nowshera  
Subject: **ENQUIRY PASI TARIQ HAYAT I/C PP TARIQ ABAD NOW  
POLICELINES NOWSHERA.**  
Memo: Kindly refer to your office Diary No. 02/PA, dated 02.02.2022.  
**SUMMARY OF ALLEGATIONS:**

PASI Tariq Hayat, while posted as I/C PP Tariq Abad now under suspension at police lines Nowshera, is reportedly involved in immoral activities, which amounts to grave misconduct on his part and warrants departmental action against you and liable you for Minor/Major punishment as defined in KP Police Rules 1975. The competent authority designated the undersigned as enquiry officer.

**PROBING:**

The delinquent police official and the aggrieved person were heard in person and their statements were recorded. PASI Tariq Hayat submitted his statement but that is just a pack of lies as he is shifting blame on the aggrieved guy, named Afaq, by charging him in illicit relations with his house-maid. Afaq may have immoral relationship with his maid but that has nothing to do with the complaint against PASI Tariq Hayat. This amounts to misguiding the senior officer to change the course of enquiry. The truth of the matter is that PASI Tariq Hayat has asked Afaq to do this act of sodomy/unnatural sex with him in return for a favor to Afaq. The latter deemed this offer extremely disrespectful and planned to gather boys to take PASI Tariq Hayat to task. In the meanwhile ASI Fayaz incharge PP Kaka Sahib reached PP Tariqabad and tried to settle the issue and later notables of the area got the issue resolved after receiving apologies from PASI Tariq Hayat. Fortunately the matter got resolved within a few hours and avoided further escalation. The aggrieved guy Afaq has even told that PASI Tariq Hayat has offered him 02 lakh Rupees via another guy in the area to close the issue by filing his complaint. The undersigned has taken reports from DSB as well which also shows bad character of PASI Tariq Hayat with previous history of such incidents.

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(AEC # 030)

**RECOMMENDATION:**

All the afore-mentioned facts speak volumes character of PASI Tariq Hayat and show his tendency to be involved in such bad practices which eventually earn bad name to the district police and tarnishes image of police in general. In humble opinion of the undersigned, the delinquent police official is found guilty of misconduct and bad character (by offering act of sodomy). He deserves to be recipient of "major punishment".

Dismissal from Service

Sub-Divisional Police Officer,  
Cantt circle Nowshera.

Signature

Signature

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POLICE DEPARTMENT

NOWSHERA DISTRICT

ORDER


This order will dispose of the departmental enquiry initiated under Khyber Pakhtunkhwa Police Rules, 1975 against PASI Tariq Hayat No.504/MR, that he while posted as I/C PP Tariq Abad is reported, involved in immoral activities.

On account of which, he was suspended, closed to Police Lines Nowshera and was proceeded against departmentally through Mr. Bilal Ahmad, ASP Cantt, Nowshera, who after fulfillment of legal formalities submitted his report to the undersigned vide his office No. 01/St: dated 09.02.2022, wherein he were proved the allegations leveled against him and recommended him for awarding major punishment.

The undersigned agreed with the recommendations of enquiry officer, therefore, PASI Tariq Hayat No.504/MR is hereby awarded Major punishment of dismissal from service, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules-1975.

OB No. 136

Dated 10/02 /2022.

  
District Police Officer,  
Nowshera

No. 276-81 /PA, dated Nowshera, the 10/02 /2022.

Copy for information and necessary action to the:

1. Regional Police Officer, Mardan.
2. ASP Cantt, Nowshera.
3. Pay Officer
4. Establishment Clerk.
5. FMC together with its enclosures (12 sheets).
6. I/C Computer Lab.

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

To

The Honourable Regional Police Officer,  
Mardan Region Mardan.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ORDER  
DATED 10.02.2022, WHEREBY THE APPELLANT WAS  
DISMISSED FROM SERVICE.**

Respected sir,

1. That the appellant was appointed as PASI on Shuhada Sons quota in the year 2015 since his appointment the appellant has performed his duty with great devotion and honesty, whatsoever, assigned to him and no complaint has been filed against by his superiors regarding his performance.
2. That the appellant while serving in the said capacity, charge sheet of falsely allegations of involvement of immoral activities along with the statement of allegations were served to the appellant which was replied by the appellant in which he denied the allegations and gave the real facts about the issue and mentioned in his reply that Afaq S/O Zahid R/O Manki Sharif called the appellant on mobile phone. The said Afaq informed the appellant that he facing some problem for which he wants the help of Police. On receipt of this message, the appellant proceeded to village Minki Sharif and on reaching there, the appellant met with Afaq who told him that young girl namely Neelam D/O Anwar is his girl friend, he further added that Neelam has been badly beaten by his brother and her brother Sohail be arrested on which she refused from making report and medical examination. The appellant clearly told Afaq that without any report of criminal case he could not arrest anyone, upon which Afaq became annoyed and when the family of Afaq knew about the relationship between Afaq and Neelam he became further annoyed and made fabricated story of allegation of sodomy/unnatural sex against the appellant. (Copies of charge sheet, statement of allegations and reply to charge sheet are attached as Annexure-A, B & C)
3. That inquiry was conducted against the appellant in which no chance of defence was provided to him as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination, but despite that the inquiry him responsible on presumption basis. (Copy of inquiry report is attached as Annexure-D)

JAVED IQR AL Gul Bela  
Daudzai Law Chamber,  
Advocate High Court Peshawar  
Mob: 0345-9465501



- (26(a))
4. That without conducting regular and proper inquiry and without issuing show notice to the appellant, the appellant was dismissed from service vide order dated 10.02.2022 on the basis of baseless allegations. (Copy of dismissal order dated 10.02.2022 is attached as Annexure-E)
5. That the appellant being aggrieved from the order dated 10.02.2022 wants to file departmental on the following grounds.

**GROUND:**

- A. That the impugned order dated 10.02.22 is against the law facts norms of justice and material on record, therefore not tenable and liable to be set aside.
- B. That no proper inquiry was conducted against the appellant to dig out the reality about the allegation as no opportunity of defence was provided to the appellant during the inquiry proceeding as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination, which is violation of law and rules and as such the impugned order dated 10.02.2022 is liable to be set aside.
- C. That the allegation of immoral activities was implicated on the appellant on the complaint of complainant namely Afaq and Afaq also gave his statement to the inquiry officer, but the appellant has not given the opportunity of cross examination of the Complainant Afaq during the inquiry proceeding, which means that one sided inquiry was conducted against the appellant and the appellant was dismissed from service on the presumption basis, which is not permissible under the law and rules.
- D. That the appellant mentioned in his reply to charge sheet about Neelam and his brother and inquiry officer also mentioned the name of ASI Fayaz I/C PS Kaka Sahib in his inquiry report, but the inquiry officer did not recorded the statement of those person/official during the inquiry proceeding to dig out the reality about the allegations leveled against the appellant, which is against the law and rules.
- E. That no witness was brought on record by the inquiry officer in support of allegations leveled against the appellant except the statement of Afaq and even Afaq on whose statement the whole action has taken against the appellant was not crossed by the appellant during the inquiry proceeding, which is against the law

JAVEDI, Gul Bela  
Daudzai Law Centre  
Advocate High Court  
Mob: 0345-3405511

and rules. (Copy of statement of Afaq is attached as Annexure-F)

- 26(6)
- F. That the inquiry officer mentioned in his finding that reports has taken from DSB as well which also shows bad character of the appellant with previous history of such incidents, but the report of DSB is false and not based on facts as no such complaint is on the record against the appellant has been filed, which shows that the appellant has been punished on presumption basis, which is not permissible under the law and rules.
- G. That the inquiry officer without observing the reply to charge sheet of the appellant and without conducting regular and proper inquiry in the allegations leveled against the appellant hold the appellant responsible for the allegation, which is against the norms of justice and fair play.
- H. That Afaq mentioned in his statement that he visited to Police Post Tariq Abad in connection of some work, but he did not disclose for what kind of work, he visited the Police Post Tariq Abad as the real story was that which was mentioned by the appellant in his reply to charge sheet, which shows that Afaq made a concocted story and on the basis of that concocted story the appellant was punished, which is against the norms of justice and fair play.
- I. That no show cause notice was issued to the appellant before passing the impugned order of dismissal from service which is violation of law and rules.
- J. That no chance of personal hearing was provided to the appellant before passing the impugned order of dismissal from service which is violation of law and rules and as such the impugned order is liable to be set aside.
- K. That the appellant has not been treated in accordance with law and rules and has been condemned unheard through out.
- L. That the appellant belong to the poor and this service is the only source of his income for the look after of his whole family and was appointed as PASI on Shuhada Son quota as the younger brother of the appellant namely constable Abdul Nasir No.1245 was martyred in the terrorist attack in 2013 in the limits of PS Akora Khattak and as the appellant is innocent, therefore, sympathetic consideration is requested.

DAVIDSON A. Gul Beta  
Daudani Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

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It is, therefore, most humbly requested that on accepting the departmental appeal of the appellant, the order dated 10.02.2022 may kindly be set aside and the appellant may be reinstated into his service with all back and consequential benefits on the basis of above submission and facts and circumstances.

Yours obediently

Muhammad Tariq Hayat, Ex-PASI  
District Nowshera.

Dated:

28-02-2022

JAVED ICBAL Gul Bela  
Daudzai Law Chamber  
District High Court Peshawar  
MOB: 0345-9405501

جناب عالی!

بحوالہ چارج شیٹ نمبری PA-03 مورخہ 02.02.2022 معروض ہوں کہ محکمہ پولیس میں بحیثیت PASI سال 2015 میں اپنے شہید بھائی عبدالناصر کی شہادت کے بعد بھرتی ہوا اور آج تک اپنی ڈیوٹی پوری ایمانداری سے سرانجام دی ہے اور مجھ پر الزام ہے کہ غیر اخلاقی سرگرمیوں میں ملوث ہوں۔ اس سلسلہ میں معروض ہوں۔ کہ دیہہ مانگی میں زاہد سابقہ ناظم علاقہ کے بیٹے آفاق کا اپنے گھر میں نوکرانی مسماۃ ن عرفش دخترن ساکن خسرے حال۔ الت خان کو اثر مانگی کے ساتھ ناجائز تعلقات ہیں۔ تقریباً 22/23 دن قبل آفاق نے بوقت 23:00 بجے مجھے فون کیا کہ مانگی آج آفاق نے بتلایا کہ میری گرل فرینڈ کو بھائی نے مارا ہے جسکو ابھی گھرنے لگا ہے۔ جو میں نے بتلایا کہ پہلے مسماۃ ن عرفش دخترن کی رپورٹ تحریر کرتے ہیں اور بغرض علاج معالجہ نقشہ ضرر پر ہسپتال بھجواتے ہیں۔ جو آفاق نے صاف انکار کیا اور مسماۃ نیلم کو گاڑی سے اتار کر چھپ گئے کہ کسی کو معلوم نہ ہو جائے۔ اس معاملہ کی آفاق کے گھر والوں کو علم ہوا اور آفاق کے بھائی محمد اسماعیل کو جب یہ معلوم ہوا کہ میرے بھائی اور مسماۃ نیلم کی ناجائز تعلقات کا طارق حیات PASI کو بھی علم ہوا ہے تو میرے خلاف جھوٹی اور من گھڑت اور بے بنیاد الزامات لگائے چونکہ زاہد سابقہ ناظم خٹک فیملی کا قریبی رشتہ ہے اور اعلیٰ سوسائٹی کے خاندان کا ایک نوکرانی کے ساتھ ناجائز تعلقات کا علم ہونے کی وجہ سے بدنام ہو رہا ہے اور اسی بدنامی پر پردہ ڈالنے کی لئے مجھے قربانی کا حکم دیا گیا۔ مسماۃ ن عرفش دخترن اور مسماۃ ن آفاق کی DNA سے ثابت بھی کیا جاسکتا ہے اور سونے پر سہاگہ یہ کہ اس معاملہ کے بعد فوراً مسماۃ نیلم کی شادی بھی کرائی اور آفاق کی بھی مورخہ 13.02.2022 کو شادی کرائی جا رہی ہے۔ تاکہ اپنی عزت بچائے اور مجھ پر جھوٹا الزام لگا کر بدنام کیا اور عزت نفس کو مجروح کیا مجھے ان کے خاندان کے کرتوتوں سے انکار کرنا میرے بدنامی کا باعث بنا اور مجھے اب یقین ہے کہ مجھے لوگ جانی اور مالی نقصان پہنچانے کے درپے ہے۔ بے گناہ ہوں معافی دی جائے۔

PASI طارق حیات  
2022

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

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ORDER.

This order will dispose-off the departmental appeal preferred by Ex-PASI Tariq Hayat No. 504/MR of Nowshera District Police against the order of District Police Officer, Nowshera, whereby he was awarded major punishment of dismissal from service vide OB: No. 136 dated 10.02.2022. The appellant was proceeded against departmentally on the allegations that he while posted as Incharge Police Post Tariq Abad Police Station Nowshera Kalan District Nowshera was reportedly involved in immoral activities.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Sub Divisional Police Officer, (SDPO) Cantt: Nowshera was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities, submitted his findings, stating therein that the allegations leveled against him had been proved. He recommended the delinquent Officer for major punishment. Therefore, the District Police Officer, Nowshera after perusal of the enquiry file agreed with the recommendations and awarded the delinquent Officer major punishment of dismissal from service vide OB: No. 136 dated 10.02.2022.

Feeling aggrieved from the order of District Police Officer, Nowshera, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 21.04.2022.

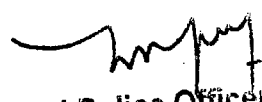
From the perusal of the enquiry file and service record of the appellant, it has been found that the allegations against the appellant have been proved beyond any shadow of doubt. As during the course of enquiry the complainant Afaq told that the appellant has offered Rs. 02 Lac to him for withdrawing his complaint. Moreover, the Sub Divisional Police Officer, (SDPO) Cantt: Nowshera was called in person who confirmed the involvement of appellant in immoral activities. However, another fresh report was sought from Sub Divisional Police Officer, (SDPO) Cantt: Nowshera who submitted his report vide No. 15/ST dated 28.04.2022, the said report revealed that the appellant arrested Neelam's brother, who used to beat her, on Afaq's request. In return, the appellant asked for some kind of physical favor from Afaq. As per the report, this was a clear demand of sodomy by the appellant which made the said Afaq angry and he gathered all his elders to bring the appellant to task. However, in the meanwhile some negotiations between elders and other Police Officials present there worked out and the matter was temporarily settled down. Being a member of disciplined/uniformed force, the involvement of the delinquent

JAVED IQBAL GULBER  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

Officer in such like immoral activities brought a bad name for entire Police force in the eyes of general public, besides affecting other members of Police force. Moreover, the appellant was under obligations to safeguard/protect the honor/dignity of the public irrespective of their gender but in the instant case the appellant himself indulged in immoral activities which is totally against the norms of disciplined force. Hence, the retention of appellant in Police Department will stigmatize the prestige of entire Police Force. Besides, during the course of personal hearing, he could not present any cogent justification to warrant interference in the order passed by the competent authority. Hence, the very conduct of appellant is unbecoming of a disciplined Police Officer. Therefore, the order passed by the competent authority does not warrant any interference.

Keeping in view the above, I, Yaseen Farooq, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

**Order Announced.**

  
Regional Police Officer,  
Mardan.

No. 3829 /ES, Dated Mardan the 31-05-2022.

Copy forwarded to District Police Officer, Nowshera for information and necessary w/r to his office Memo: No. 506/PA dated 14.03.2022. His Service Record is returned herewith.

(\*\*\*\*)

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC-5317)

Other Documents

79



Pakistan

Position in Class.

*3rd*

No. *2506* /PSIT

# CERTIFICATE

This is to certify that


Mr/Ms ASI Muhammad Tariq Hayat No.504/MR District/ Unit Nowshe

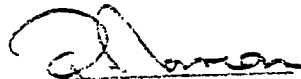
has participated and successfully completed

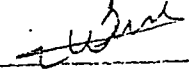
## Basic IT Skills Training

held at Police School of Information Technology, Peshawar

From 04.12.2017 to 15.12.2017

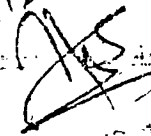
  
Deputy Inspector General of Police,  
Training, Khyber Pakhtunkhwa,  
Peshawar

  
Paul Norman  
International Policing Specialist  
UNDP, Peshawar

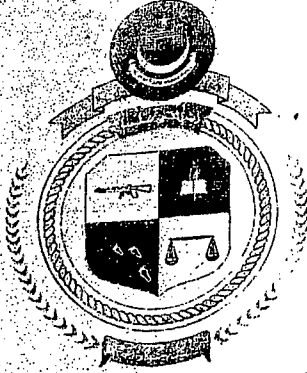
  
Director  
Police School of  
Information Technology, Peshawar

JAVED IQBAL GULBE  
Attorney at Law  
Supreme Court (ASCI-5317)

*Attest*  
Head Clerk D. P. O.  
Nowshe

ATTESTED  
  
Head Clerk D. P. O.  
Nowshe

# POLICE TRAINING COLLEGE HANGU



1935

Commendation Certificate III

*Attested*  
Head Clerk D. P. O  
Nowshera.

is awarded to

**MUHAMMAD TARIQ 504 PASI MUSA.COY**

in recognition of

**GOOD TURNOUT IN GENERAL PRADE**

*ATTESTED*

*[Signature]*  
Head Clerk D  
Nowshera

Dated: 15.06.2017  
Order Book No. 398

Dy: Commandant  
Police Training College Hangu

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)



# HAYATABAD PESHAWAR POLICE SCHOOL OF INVESTIGATION



This is to certify that

ASI Tariq Hayat 504

District

Peshawar

has Participated and Successfully Completed Training on

Hotspot Policing & IT Based Skills Investigation Course

held at Police School of Investigation Hayatabad, Peshawar. Date: \_\_\_\_\_  
\_\_\_\_\_ to \_\_\_\_\_

Deputy Inspector General of Police  
Training  
Kyber Pakhtunkhwa, Peshawar

Director  
Police School of Investigation  
Hayatabad Peshawar

JAVED IQBAL GULBELA  
Advocate  
of Pakistan  
Supreme Court  
(ASC # 9317)

Head  
D.P.O.  
Peshawar

S.No. 325/2019



**CERTIFICATE**  
**Capacity Building Workshop**  
**Forensic Modes of Crimes Investigation**

JAVED IQBAL GULBEELA  
 Advocate  
 Supreme Court of Pakistan  
 (ASC # 5317)

**Mr. Tariq Hayat PASI**

*Has participated in the Capacity Building Workshop Organized for  
 Police Investigation Officers District Nowshera-Khyber  
 Pakhtunkhwa*

*13<sup>th</sup> and 14<sup>th</sup> January 2020*

*Saif Usmani*  
 Executive Director  
 Development Agent of Change

*ATTESTED*  
  
 Head Clerk D. P. O.,  
 Nowshera.

**ATTESTED**  
  
 SHO Nizam-pur

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# KHYBER PAKHTUNKHWA



## Commendation Certificate

Class II

Granted by

Mr. Salah-ud-Din Kundi, L.I Newsdesk

District Police Officer  
MOHMAND

TO. Pasi Tariq Hayat L.I of Bahai

Son of Dafq Training Center Mohmand

District \_\_\_\_\_

In Recognition of

His valuable Cooperation with Df Training  
Mohmand

O.B. NO: 333

DATED: 8-4-2021

JAVED IZZAT GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

ATTESTED



District Police Officer  
MOHMAND

District Police Officer  
Mohmand



# وکالت نامہ

بعدالت: سرور سز ٹریبونل خیر پختونخوا پشاور

طارق حیات بنام حکومت

مناجب Appellant دعویٰ Service Appeal

تاریخ 11-06-2022

باعتبار تھیں آپ کے مقدمہ مندرجہ بالا عنوان اپنی طرف سے واسطے پیروی و خواہی  
بمقام پشاور کیلے جاویدا قبال گل بیلیم ایڈوکیٹ سپریم کورٹ آف پاکستان

کو بدیں شرط وکیل مقرر کیا ہے۔ کہ میں ہر پیشی کا کوڈ یا بزرگیہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے  
جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر دالت کروں گا، اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری غیر  
حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہونگے۔ نیز وکیل صاحب  
موصوف صدر مقام کچہری کی کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ  
ہونگے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش  
ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی  
صاحب موصوف ذمہ دار نہ ہونگے۔ مجھے کوکل پرداختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب کو  
عرضی دعویٰ و جواب دعویٰ اور درخواست جرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی  
اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کے روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے  
بیان دینے اور سپرد ثالثی و راضی نامہ فیصلہ پر خلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی  
مقدمہ یا منسوخی ڈگری یا کٹرفہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار  
نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزوی کارروائی کے  
واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا بیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کے  
ہر امر دہی اور ویسے ہی اختیارات حاصل ہونگے جیسے کے صاحب موصوف کو حاصل ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ  
التواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو  
صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف  
کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ جا کہ سندر ہے۔

مورخہ 11/06/2022 مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

طارق حیات  
رہیلہ  
حالیہ

Ev. Fasi Muhammed Tahir Hart

طارق حیات

Accepted by: -

- 1) Javed Iqbal Gulbela, ASC Be-10-7924  
17301-1496065-7
- 2) Saghir Iqbal Gulbela, AHC
- 3) Ahsan Sardar, AHC
- 4) Hamza Durrani, Advocate

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

934

SB

APPEAL No..... of 20<sup>22</sup>

Toriz Hayat

Appellant/Petitioner

Versus

IGP of Police KPK

RESPONDENT(S)

Respondent (1)

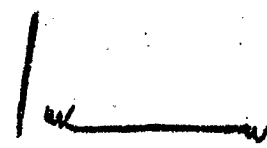
IGP of Police KPK

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17/08/2022 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply  
Copy of appeal  
is attached



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

2-8-2022

“A”

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No. *Res*

934

*SB*

APPEAL No..... of 20 22.

*Tariq Hayat*

Appellant/Petitioner

Versus

*IGP KPK Peshawar.*

RESPONDENT(S)

*Respondent (2)*

*Regional Police Officer*

Notice to Appellant/Petitioner

*Mardan*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *10/10/2022* at *9:00am*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*For Reply*



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

*Copy of appeal is Attached*

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No. *934*

*934*

*SB*

APPEAL No..... of 20 ..

*Tariq Hayat*

Appellant/Petitioner

Versus

*IGP KPK Peshawar.*

RESPONDENT(S)

*Respondent (3)*

*District Police Officer*

Notice to Appellant/Petitioner

*Moushara*

Take notice that your appeal has been fixed for Preliminary hearing, replication, Affidavit/counter affidavit/record/arguments/order before this Tribunal on *10/10/2022* at *9:50am*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*For Reply*

*[Signature]*

*Copy of Appeal is Attached*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.