Form- A FORM OF ORDER SHEET

Court of	
Case No	625/ 2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/04/2022	The appeal of Mr. Zia-ur-Rehman presented today by Mr. Yasir Salim Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR
2-	rotel	This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>Ob-OS-22</u> . Notices be issued to appellant and his counsel for the date fixed. CHAIRMAN CHAIRMAN CHAIRMAN CHAIRMAN CHAIRMAN CHAIRMAN CHAIRMAN CHAIRMAN CHAIRMAN
		Junior to counsel for the appellant present. Lawyers are on general strike, therefore, case is adjourned. To come up for preliminary hearing on 29.07.2022 before S.B. (Rozina Rehman) Member (J)

BEFORE THE KHYBER PUKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. 585 /2022

Zia ur Rehman, Ex-Constable Police Lines Nowshera

.....APPELLANT

V/S

- 1. The Provincial Police Officer, Khyber Pakhtunkhwa.
- 2. The Regional Police officer, Khyber Pakhtunkhwa.
- 3. The District Police Officer, Nowshera.

.....RESPONDENTS

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4.	Copy of the final merit list	$\frac{R}{B}$	0 13
5.	Copies of Naqal Madh & daily Tehsilwise Deployment at polling stations	C	14-23
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Through:

Appellant

Yasin Salcem

Advocate High Court,

Peshawar



BEFORE THE KHYBER PUKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No.	/2022	q
Zia ur Rehman, Ex-Const	able Police Lines N	Nowshera
	V/S	APPELLANT
 The Provincial Police The Regional Police of The District Police Of 	fficer, Khyber Pakl	khtunkhwa. ntunkhwa.

SERVICE APPEAL U/S**OF** THE PAKHTUNKHWA SERVICE TRIBUNAL ACT. AGAINST THE IMPUGNED ORDER DATED 29.12.2021, WHEREBY THE APPELLANT HAS BEEN AWARDED THE MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE AGAINST WHICH HIS DEPARTMENTAL APPEAL DATED 10.01.2022 HAS ALSO BEEN REGRETTED VIDE OFFICE ORDER DATED 30.03.2022.

..RESPONDENTS

PRAYER:

On acceptance of this appeal the impugned dismissal order dated 29.12.2021 and appellate order dated 30.03.2022 may please be set aside and I may kindly be reinstated into service with all back benefits.

Respectfully Sheweth. FACTS:

- 1. That various posts of police constable BPS-7 has been advertised which are also uploaded on ETEA website seeking applications from desirous candidates wherein last date of submission of application was shown as 30.09.2020. (Copy of the advertisement is attached as annexure A).
- 2. That the appellant having qualification of Intermediate, duly applied for the post so advertised through online application thereafter roll number was issued to the appellant which was conducted by educational testing and evaluation agency (ETEA) Peshawar. The appellant duly appeared in the test and fortunately qualified the test and undergone the physical test and was successful in physical test also.

- 3. That being successful in screening test and physical endurance test the appellant was duly appointed by the competent authority on the recommendations of duly constituted departmental selection committee. (Copy of the final merit list is attached as annexure B).
- 4. That after appointment the appellant took charge of his post and started performing his duties. The appellant was assigned duty for local body election 2021. (Copies of Naqal Madh & daily Tehsilwise Deployment at polling stations is attached as annexure C).
- 5. That while performing his duties in the said capacity, a fact finding inquiry was conducted vide letter dated 10.12.2021 on some anonymous complaint having baseless and false allegations against the appellant. (Copy of letter dated 10.12.2021 is attached as annexure D).
- 6. That the appellant appeared in the fact finding inquiry and denied all the allegations however the inquiry officer in partial manner conducted the inquiry and submitted his report vide letter dated 24:12.2021 merely on the bases of surmises and conjecture and held him guilty of all charges. Even one Khalil Ullah owner of Shaheen Printing Press appeared and recorded his statement before the inquiry officer. (Copies of statements and facts findings inquiry report dated 24.12.2021 are attached as annexure E&F).
- 7. That without issuing the fact finding inquiry report or without issuing any charge sheet and without conducting any regular inquiry the appellant was issued final show cause notice on 28.12.2021 giving 7 days to applicant to submit his reply if he wants to do so. (Copy of final show cause notice is attached as annexure G).
- 8. That on 03.01.2021 when the appellant went to the office of DPO Nowshera to submit his reply to show cause notice he was informed that he has already been dismissed from service, however, the appellant submitted his reply in the office of DPO Nowshera on the said date. (Copies of reply to Show Cause Notice dated 03.01.2022, its receipt and dismissal order dated 29.12.2021 are attached as annexure H & I).
- 9. That feeling aggrieved the appellant filed his departmental appeal on 10.01.2022, however the same has been regretted vide office order dated 30.03.2022. (Copy of departmental appeal dated 10.01.2022 & order dated 30.03.2022 are attached as annexure J &K).
- 10. That the impugned order is illegal unlawful against the law and facts hence liable to be set aside inter alia on the following grounds:

GROUNDS OF SERVICE APPEAL

- A. \That the appellant have not been treated in accordance with law hence my rights secured and guaranteed under the law and constitution is badly violated.
- B. That no proper procedure has been followed before the dismissal order dated 28.12.2021, no charge sheet has been served upon me nor any regular inquiry has been conducted. Only a fact finding was conducted and that too in a very partial and biased manner, thus the impugned order is liable to be set aside on this score alone.
- C. That quite astonishingly and illegally without waiting for reply of the appellant on the very next day he was awarded the major penalty of dismissal from service vide office order dated 29.12.2021.
- D. That findings of the inquiry report was not provided to the appellant and as such he was not provided fair opportunity to defend himself and as such the impugned order is defective and liable to be set aside.
- E. That not a single document was provided to the appellant and he was constrained to file an application to the respondent / DPO Nowshera to provide him all the relevant documents so that he could be able to know the outcome of inquiry proceedings which resulted in his dismissal. (Copy of application under RTI Act is attached as annexure L).
- F. That the appellant have not been given opportunity of personal hearing before the issuance of the impugned order hence I have been condemned unheard.
- G. That the appellant duly applied for the post, appeared in screening and physical test and remained successful, I duly took over charge of my post and started performing my duties, thus the order of my appointment has been acted upon and valuable rights has been created in my favour. As principle of *LOCUS PONATENTIE* strongly lies in my favor so my service could not be snatched away illegally with one stroke of pen.
- H. That the appellant was appointed by the competent authority after observing all codal formalities, no illegality or irregularity has been committed in the process of appointment.

- I. That the inquiry officer had admitted during his report that the applicant along with other dismissed candidates himself appeared for the examination. It is pertinent to mention here that during the fact finding inquiry, it was never proved that the paper of the applicant was actually filled by one Sifatullah or that the said Sifatullah had helped the applicant in solving his paper, though in his inquiry report he, without any proof or justification concluded that the applicant used illegal ways to pass his exams. Thus the whole precedence conducted against the applicant prior to his dismissal were illegal and defective in nature and thus not sustainable in the eye of laws.
- J. That so far as putting wrong entry of date of birth in application form is concerned, it was submitted to the inquiry officer that the applicant did not himself fill his form rather it was filled by a person sitting in Shaheen Computers Kheshki Payan who mistakenly and unintentionally put wrong entries in his online form who personally appeared before the inquiry officer and admitted his mistake as there were hundreds of forms to be filled by him on that day it is pertinent to mention here that after noticing his mistake the applicant himself brought it to in the notice of ETEA Administration however the applicant was replied that it was not a big issue and can be rectified at the time of verification of documents.
- K. That if all there was any irregularity committed in the process of submission of online forms, the same can neither be attributed to the undersigned nor can be be punished for the faults or lapses committed by others.
- L. That the applicant was appointed after the rigors of selection process by the competent authority on the recommendations of duly constituted departmental selection committee and he after appointment took charge of his post so valuable rights has been accrued in the favor of applicant which can not be snatched through any illegal means.
- M. That the appellant have never committed any act or omission which could be termed as misconduct, albeit he was awarded major penalty of dismissal from service.
- N. That the appellant is young and energetic and wants to service for his department albeit his career has been stigmatized by the impugned dismissal order.



O. That the appellant seek permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that On acceptance of this appeal the impugned dismissal order dated 29.12.2021 and appellate order dated 30.03.2022 may please be set aside and I may kindly be reinstated into service with all back benefits.

Any other relief as deemed appropriate in circumstances of the case, not specifically asked for, may also be granted to the appellant.

Through:

Appellant

Yasir Salçem

Advocate High Court,

Peshawar

Certificate:-

It is certify that no such like <u>Service Appeal</u> has earlier been filed by the Appellant in this Honourable Tribunal.

ADVOCATE.

AFFIDAVIT

I, Zia Ullah Khan S/O Nawar Khan Ex- Arabic Teacher G MS Adam Abad Swabi, do hereby solemnly affirm and declare on oath that contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

الشهاد راسة محر أله السال المحديد الما تحر المحتوق

تکمه پولیس نیبر پخنونخوا کو پولیس کانشیس (۵۶-۵۲۶) کی متعدد آسامیوں پر مجر تی سکے سلیے صوبہ نیبر پخنونخوا کے مستقل سکونتی افراد (بشمول) ضم شدہ قبائلی اضلاع) سے بندر بید خیبر پختونخوا ایجو کیشنل ٹیسٹنگ ایڈ ایولویشن ایجنسی (ETEA) درخواستیں مطلوب ہیں۔خواہشند و موزوں امید داران جو درن ذیل شرائط پر بیرااتر نے ہوں کو بذریعے اشتہار مسلن کیا جاتا ہے کہ۔

(a) اپنی در نواستیں یتجے دیے گئے طریقہ کار مے مطابق آن لائن www.etea.edu.pk بر مور فعد 11 ستمبر 2020 سے 30 ستمبر 2020 کئے (a)

(b) مقرره تاری آن ایا ئن درخواست جمع نہیں کرائی جاسکے گئے۔

مثر الأنجر لي:

(1) الطليم: سيئرات پائل (ع) عمر: 18 تا 25 سال (عربي عد مور مد 31 بمبر 2019 كو 25 سال سند ياده ند موجيد 30 سبر 2020 كو 18 سال سن كمند : ول-) (3) قد: 5 في المائي (مروانيدوارول كے ليے) اور 5 في ايك الح أخوا تين اميدوارول كے ليے)

(5) ڈو دیبائل: سرنب نیبیر پتنوننوائے متعلقہ اضلاع بشول ضم شدہ قبائل اضلا^{نع}/علاقہ جات۔ مصد حیاز نور مصد مصد معمومات مسلم معلی دور دمیروں محمد کسان ور 77 منٹ میں ایک کلومیٹر

(5) جسانی نیست: 07 مند میں ایک میل دوڑ (مردوں کے لیے) اور 07 منٹ میں ایک کلومیٹر دوڑ (خوانٹین کے لیے) پاس کرنالازی ہے۔

(7) جسمانی انتخانات مندرجه ذیل شهرول میں ہو نگے۔

(۱) پیتاور (۱۱) مردان (۱۱۱) دیراد کر (۱۷) پیتاورد (۷) پیترال (۷۱) کوباث (۱۱) بنول (۱۱) پیتاور (۱۱) کوباث (۱۱۱) دیراد کر (۱۱۱) پیتاورد (۱۱۱) پیتاورد (۱۱۱) دیراد کر (۱۱۱) دی است دیراد کر (۱۱۱) تخریری شیست: جسمانی میست میس کامیاب امیدوارول (جن امیدوارول نے جسمانی پیانش اور دوز کوالیفانی کیا ہو) کو تخریری امتحان کے لیے مقرره انساری میس بیتی ، و با ہوگا۔ (تفسیلات و یب سائٹ پر موجود ہو تگی نیز کامیاب امیدوارول کو بزراجد SMS جمی اطلاع دی جائیگا۔ کیول کے انگاش ،اردو، اسلام بیات (دیکس برائے غیر مسلم) ، پاک شندی اور جزل نائج میں لیاجائیگا۔

(9) اضافی نمبر: تمام طرزمے مندرجہ بالا امتحانات میں کامیاب امیدواروں کامیرٹ بناتے وقت اضافی نمبرات مندرجہ ذیل فار مولے کے مطابق ویتے جانمیں تھے۔
(الف) انٹر میڈیٹ: 20 نمبر (ب) بیکر: گری ہولڈرز: 01 نمبر (ج) ماشر ڈگری ہولڈرز: 10 نمبر (فوٹ: اضافی نمبر ۵۵ سے زیاوہ نہیں ہوئے۔)
نوٹ : 1۔ حکومتی پالیس کے مطابق عمر، فار، چھاتی اور تعلیم میں کوئی رعایت نہیں دی جائیگ۔ للذا متعاقبہ معیار پر پورا نہ اتر نے والے امیدواروں کی
درخواشیں منظور نہیں کی جائیگی۔

۔۔ نیبر پختو نخواکے اضلاع سوات، بونیر، شانگلہ، دیر اونر، دیراپر، چترال، کوہتان، تور غراور سنے ضم شدہ اضلاع سے امید داروں کو کور نمنٹ کی طرنہ ہے، دی تنی (03) سال زائد عمر میں رعایت وی جائے گی۔

2- اس (3 1) فيصد خوا تنين ، و س (1 0) فيصد يوليس الماز بين يج بيون اور يانج (05) فيصد كويه الخليتي برادري يج ليم مختص موكا

ور قواست دیخ اگر لقه کار

کوانے ہے بعد اصل ڈیپازٹ ساپ Candidate Copy ہے پاس محفوظ رکھیں کیونکہ بینک ڈیپازٹ ساپ اور رول نمبر ساپ کے بغیر امتحان میں بیٹھنے کی احتات نہیں وی جائیگی۔ برائے مہر بانی تعلیمی و ستاوبزات/اسناد ایٹاآفس سیھیجے کی زحمت نہ کریں۔ ETEA یا محکمہ پولیس کو اگر شارٹ کسٹڈ امید واروں کی تعلیمی اسناد کی تقدیق شعدہ نقول تمام طرز کے نمیٹ پاس کرنے سے بعد جمع کروانا ہو گئی، جس سے لیے امید واروں کو بذرید ایٹا SMS اطلاع دی جائیگی۔

امیدواروں کو جسمانی و تحریری شمیٹ کارول نمبر ساپ ڈاؤن اوڈ اپر سٹ کرنے کے لیے 5145 کے ذریعے اطلاع وی جائے گی نیزیہ معلومات ایٹا کی ویب سائٹ پر بھی وی جائیں گی۔ جسمانی پیائش و دوڑ کی ناری اور شمیٹ سٹر رول نمبر سلپ میں درج ہوگا۔ یاد رکھیں کہ ایٹا جسمانی و تحریری امتحان کے لیے رول نمبر سلپ کسی مجمی امیدوار کو بذریعہ ڈاک ارسال نہیں کرے گا۔ اگر آپ نے اپ ہم کا نیٹ ورک تبدیل کیا ہو یا اپ مو بائل بر آپ نے پروموشن مسیجز بلاک کے ہوں تو آپکو ایٹا کی طرف سے کوئی SMS موصول نمیں ہوگا۔ للذاآن لائن فارم میں صرف ایسا ہی موبائل نمبر درج کریں جسکانیٹ ورک تبدیل نے بیائی ہو۔ اس کے علاوہ اگر آپکا موبائل مسلسل تین (03) محفظ بند ہوا یا آپ مسلسل تین (03) محفظ نیٹ ورک ریٹے ہو بابر ہوئے اور اس دوران ایٹا کی طرف سے آپ کو SMS بھوٹا کیا تو وہ SMS تین (03) محفظ بند ہوا یا آپ مسلسل تین دورک رنظام کے ذریعے ختم (EXPIRE) ہو جائے گا لین ایک طرف سے آپ کو SMS موصول نمیں ہوگا۔

آن لائن در خواسیس (بمع 650 روپے امتحانی فیس) جمع کرانے کی آخری تاریخ 30 ستمبر 2020 ہے۔ مزید معلومات کے لیے: www.etea.edu.pk

دُ پِیْ دَائر کِمْرِ ایدِ من نیبر پختو نخواایجو کیشنل لمیسٹنگ اینڈ ایولویشن ایجنسی (ETEA) - بشاور منجانب: ۔اے آئی جی اسٹیبلشنٹ، خیبر پختو نخوا پولیس - بشاور

POLICE DEPARTMENT

LIST OF CANDIDATES FOR RECRUITMENT AS CONSTABLE 2021 THROUGH ETEA

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Goizer Ali		Pordil Khan	Shah Nawaz Khan	Jengraiz Khen	Samin Jan	Asif Ali Khan	Rewail Shah	Gohar Ali Shah	Shah Zemin	Habib Ur Rolmen	Niez Ali Khan	Fazal Hayot	Muhammad Karim	Arshad Khan	Inzer Sheh	Inem Ali	han Ali	Inem Ali	Fezat Ur Rahman	Noor Ali	Munaver Khen	X ,	Mir Afzel Khan	Nascem Ullah	Gul Zeman	Father Name
Khan Sher Garhi	varenër rëvan	Khochn Davin	Shpano Kalov	Moh: Tordher Rashakai	Moh: Batok Zoi.Kheshgi Bale	Moh: Telab Dagbesod	Banda Sheikh Ismail	Moh: Aba Khel NSR Kalan	Bara Khel Mera Risulpur	Akora Khanak	Gharib Abad Kheshgi Payan	Khishigi Payan	Moh: Batak Zai Kheshgi Bale	Garhi Momin	Sulun Abad Sheikhan	Rahim Uliah Korona Kheshei Bala	Ruhim Ullah Korona Kheshei Bale	Rahim Ullah Korone Kheshgi Bula	Chirat Road Panah Kot	Mah: Ander Khel Dagbesod	Payen	Moh: Sheikh Shekhaz Baha Kharka:	Behram Kalny	Azakliel Bala	Moh: Marden Khel zendo Bando Ch.	Residence
Pabbi	707 7025	NSB K SIL	Risalpur	Risalpur	NSR Kelan	Pabbi	Akbarpura	NSR Kalen	Risalpur	Akora	NSR Kalan	NSR Kalan	NSR Katan	Akbaroura	Jalozai	NSR Kalan	NSR Kalan	NSR Kalan	Jalozai	Pabbi	NSR Kalan	Kusalpur	n: .	Azakhal		Palice
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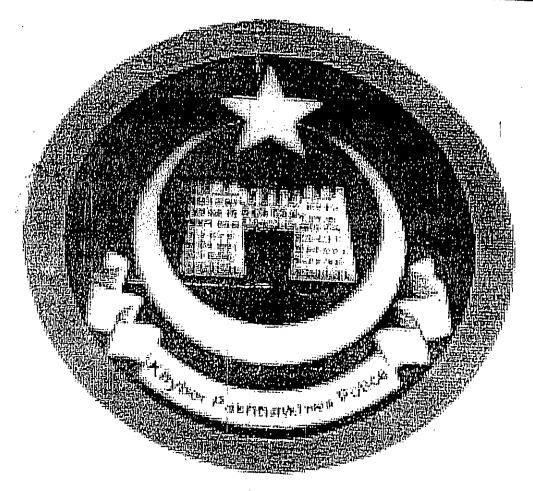
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MEDICAL CERTIFICATE US

Name of Official Zja Ur Rahmun	the second second
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Father's Name Junin Ali	
Residence Rubing Ulbah Korog	
Date of Birth 14.03.2060	
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Signature of the Official	
Seal of Officer	Marie Carlos
I do hereby certify that I have examined Mr.	
a candidate for employment in the Office of the	'
and cannot discover that he had any disease communicable of	
affection or bodily infirmity except	
l do not consider this as disqualification for t	employment in the office of the
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•	Medical Superintendent, DHQ, Hospital Nowshera
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POLICE DEPARTMENT

NOWSHERA DISTRICT



CONTINGENCY PLAN FOR LOCAL BODIES- ELECTIONS-2021

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ON-2021 (Ov	er All Statistics)	
CAL BODY ELECTION	LECTION-2021	

POLICE DEPARTMENT

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,	DISTRICT NOWSEHRA	4 Action 18	Total	010	
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	9	Minority 153
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	Total Strength	Inspector .03	Sis - 00		
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	No 100 to 1	West Callit Cifcle 1x 3	No. 2 Maps Circle 1x 3	No. 3 Akora Circle 1x 3	3 x Insp. 9 x FCs
Mohafiz	No.1 Mobile – 1x 3	No.2 Mobile – 1x 3	2 x SI – 6x FCs		

AIM OF THE PLAN

- To maintain law and order before, during and after elections
- To ensure smooth, safe and peaceful conduct of elections.
- To identify the trouble areas.
- To identify political elements etc opposing the holding of elections.
- > To collect intelligence with solid evidence to identify political staunch workers.
- To specify the role of students and laborer in elections.
- > To identify the elements who would incite the general public during elections against
- > To determine nature/size of trouble well in advance which might erupt in own area of jurisdiction and assess quantum of force required to deal with the trouble effectively before it became violent and un-controllable.
- Specify preventive measures to be adopted in advance.
- > To prepare lists of political leaders and other disgruntled elements of parties who are potential threat to law and order and opposing the elections.
- To exercise close check on the saboteurs and other subversive elements and to fail their nefarious design before it is acted upon. The anticipated trouble can be divided

OBJECTIVES

- a. To maintain law & order.
- b. To ensure safe movement of ROs, DROs.
- c. To ensure smooth and safe conduct of polling.
- d. To arrange security of ballot papers and other allied material.
- e. To ensure security of VIPs/VVIPs.
- f. To protect the contesting candidates.
- g. To secure the vital installations etc.

METHOD

The following measures are planned to achieve the above objectives:-

- a. Collect, collate and disseminate intelligence in advance with regard to any attempt or
- b. Surveillance over all political sectarian, religious leaders and students/labor community, so that in case of any breach of peace, their pre-emptive arrest can be
- c. Deployment of Police and other Law Enforcing Agencies at the Polling Stations to be made according to the formula and instructions issued by CPO.
- d. Concentration of Reserve Toops at appropriate places to frustrate away any threat to

5

PHASES

In order to accomplish these objectives, the Contingency Plan will run through the PHASE-I

PRE-ELECTION CAMPAIGN

Although this phase has already been set in, but Its Intensity will gain momentum till PHASE-II

ELECTION DAY 19th, December 2021

19 December from 07:00 hours till the announcement of results and dispersal of public from Polling Stations and public places. PHASE-III

POST ELECTION SCENARIO

From 20th December, 2021 (Morning) till stand down call will be given by the undersigned. It will depend on the situation at hands at that time.

PHASE-I

PRE ELECTION CAMPAIGN

In Nowshera District, there will be a spate of political meetings, rallies and demonstrations particularly in the Urban areas of the District, which are important and extremely sensitive from law & order point of view.

It is also expected that the Political parties besides arranging local/corner meetings to express show of strength to their opponents. There might be large-scale processions & resultantly, serious Law & Order situation might be created, which would require immediate remedial measures.

In order to cope with all such eventualities, the following measures shall be adopted till Election:-

a. DUTIES RELATING TO ELECTIONEERING PROCESS

The role of Police, has always been, shall be the maintaining Law & Order and public peace throughout the District. As such it shall be the utmost responsibility of every Police Officer to make sure that men given under his command are properly;-

- Briefed about their duties.
- ii. Fully equipped for the duty,
- iii. Trained to exercise, restrain and restore normalcy whenever called into action. It shall be the foremost duty to warn/admonish the candidates responsible for the mudslinging and provoke their workers to indulge in disruptive activities. In case, these bickering continue and there is an imminent danger to peace and tranquility, legal action must be taken in consultation with Deputy Commissioner, Nowshera. b. CODE OF CONDUCT

With a view to contribute positively the process of peaceful, free and fair Elections, the Leaders of various Political Parties, the Deputy Commissioner, Nowshera is being requested to immediately call and brief the Candidates or their nominated agents about Election code of conduct.

(2-)

Any deviation shall be immediately pointed out to the concerned Organizations/Candidates and necessary action taken thereupon. In case of any serious breach, the matter shall be brought into the notice of undersigned and the Dy. Inspector General of Police, Mardan Region-I, Mardan without any detay. In such a situation, preventive steps must be taken immediately.

c. BAN ON CARRIAGE OF ARMS/EXPLOSIVE

Ban on the carriage of Arms be strictly executed.

d. REMOVAL OF WALL PAINTING/CHALKING

Writing of offensive and provocative slogans on walls shall not be allowed. The local bodies particularly, the Town Committees and Union Councils would be required to wipe-out all Election writings on the walls of official buildings under the supervision of local Police.

e. <u>LAW & ORDER DUTIES</u>

RESERVES

I. RRF & Ellte should be standing reserves to meet any law & order situation in the Urban limits of the district.

ii. In case of any greater requirement, adjustment will be made accordingly. All Reserves will be equipped with anti-riot gear and 1-3 armed personnel.

f. DAILY REQUIREMENT:

All SDPOs shall ensure that every Police Station under their command has 100% strength available for day to day Police Station duties, which will include covering small meetings/rallies during the course of electioneering. Reserve shall only be deployed whenever there is an actual requirement. They should revert immediately after the threat is removed.

(2-2)

TEHSIL WISE DEPLOYMENT AT POLING STATIONS (Over All Supervision: Mr. Khan Khel Khan SP Investigation)

RA Mr. Bilal Ahmad, ASP Cantt Grcle (03314874682) assisted by Insp Shahjee-Hussain ASDPO Cantt & O PS Cantt (0313-9595966)

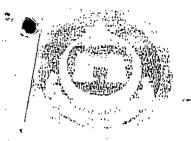
HO PS Kalan (0340-9022800)

HO PS Risalpur (0344-9201520)

•								
go	Police Station	Category	Name of Incharge	Police Strength	LHWs Strength	Education Department		·
I No. I	Azakhel	Normal	UtC Anwar Mehmood No.1304 Inv: Azakhel 0345-5008484	1.FC Junaid Khan No.412 Police Lines 0316-9917533-		Jamdad Khan Chowkidar 0316-	MAIID SHEHZAD	
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,	Azakhei	Sensitive	PACI Astro Alexander	1 FC Sana Ullah No. 1602 PS Azakhel 0300-3527696		Pukhsar ali shah	RUKHSANA NAZ	
par		<u></u> ,	For Aries Alam NO.977M EPIC	2.1 HC 53eed No. 1111 PS Azakhel 0344-5817052	•	Chowkidar 0343-	ASST PROFESSOR	
	-			3.Lf. Basmin No.167 Police Lines		1963363	GGDC PIRAIAI	
∍khel	-		HC Khadim Hurania 200 101 2				3078305744	
	Azakhel	Sensitive	for Pathi O212 eegacoa	1.FC Tanveer No.1728 CDL 0302-8887380		Ubaid Ullah Chowkidar	Ejaz Ahmad SST-Sc	
			7097800-5150 550	7.1.C Seed Rauf No.169 EPTC		0343-6016275	GHS Azakhel Bala	
							0300 5945218	
ikhei			4:54 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	1.FC Abdur Rauf No.1599 CDL 0331-5049437	· ·	Tayyab Shah Chowkidar	SHAHNAZ GUL	
	Azakhei	Sensitive	COTO	2. LHC Asiaghfiruliah No.1388 PP Ajab Bagh 0332-0523733		GGHSS Azakhel Bala	SS CHEMISTRY	
			ردا ر	3.LFC Rahat Jehan No. 156 Police Lines		Mamrez Chowkidar	GGHSS AZA KHET BALA	
,						0345-1910179	NOWSHERA	
No.3							03369538925	
ialā	Azakhet	Sensitive	Unc rained All No.638 Police	1.FC Nabi Ullah No.1151 Pay Branch 0346-5649051	. LHW Naseem Begum 0348-	Masaud Khan	Razi ur RehmanSST-Sc	
			Lines 0302-57559	2.fC Akbar Zaman No.194 EPTC	1951235	Chowkidar	GHS Azakhel Bala	
₹0.3						03429424566	0347 9290256	
	Azakhel	Sensitive	11. Haffad Ali (20.574 lav.)	1.FC Gul Sair No. 1907 PS Azakhel 0331-9074114		Fazal Rabi Chowkidar		
			-	2.FC Weli Ahmad No.93 EPTC		0336-9363142	0311 6698980 /0333	
1001							9178670	
Bala	Azakhel	Centifica	LHC Muhammad Ali No. 1215	1.FC Ata Ulaih No. 1562 PS Azakhel 0315-1993895		Hilkher Ahmad	SADIA KIRAN	
	· · · · ·			2.FC Muhammad Alaq No.5363 EPTC		Chowkidar 0345	ASST PROFESSOR	
				3. PASI Kainat No.857 Police Lines		9293450	GGDC PIRPAI	
Ţ	-4	1					033392657350	
4	Jorder		LHC Saleem laved No. 407		Afia Begura Population 0345-	Malak Faisal Chowkidar	SHEEMA MUNITAZ KAKA	
}	12.03.07	DI DI		el 0335-0936460	/66667	0349-5190112	KHE1 SST BIO-CHEMISTRY	
*****		· <u>·</u>		2.1. Junaio Khan No.3105 EPTC			(GGHSS AZA KHIL PAYAU	
							NOWSHERA	
							100000	

chool 2	Azakhel Sensilive	SI Muntazir Khan Oll PS ve Azakhel (0345-9703993)	2.FC Said Ali Shah No. 322 PS Azakhel 0334-5478764 3.LFC Shumaila No. 597 PS Azakhel 4.Muhammad Hafeez Civil Defense 5.Muhammad Ribwan Civil Defense			KAMRAN ALI SHAH SS GHSS NSR KALAN 03009049659
ا څا	Azakhel Sensiive	HC ljaz No.1286 Naib Court 0334-8908614	1.FC Afral Shah No.627 PS Azakhel 0314-9033612 2.FC Adil Shah No.162 EPTC		Hayat Ullah Chowkidar 0310-2122538	Irfan Ullah V/P GHSS Pir Piai, Nowshera, 0346-9009844
Aza	Azakhel Normal	EHC Sobail No.210 Traffic Staff	1.FC Sayed Noor No.102 Police Lines 0345-7707093	LHW Shesh Begum 0316- 1936759	Faid Chowkidar 0314-5514124	DPE (BPS-17) GHSS AZA KHEL BALA, NOWSHERA 0311-9943605
Azakhel _	.hel Normal	UHC Shah Nawaz No.725 Inv.	1.FC Muhammad Adil No.140 Police Lines 0312-1992032	LHW Faiza BHU Badrashi	Zuffigar Chowkidar 0344-9136056	NADIA MAJEED SST (MATHS-PHYSICS) - PERSONAL (BPS-17) GGHSS AZA KHEL PAYAN, NOWSHERA 0307-5409387
Azakhel	hel Normal	LHC Ageel Ahmad No.107 Inv. 0313-0879726	1.FC Hamid Kamal No.142 Police Lines 0311-942091.2		Khair Uzzaman Chowkidar 0315- 9105366	Shaheen Shah SSS (Eco) GHSS Pir Pai Nowshera 0333-9659253
Azakĥel	Sel Normal	HC Asif No.310 Nabi Court 0321-2654925	1.FC FC Muhammad Abbas No.1145 Police Lines 0313-1950108	1HW Shaguita Begum 0302- 5445919	Riaz Chowkidar 0341- 2031331	Minhaj ud din SSS(Eng) GHSS Pir Piat-Nawshera 0346-5641693
Azakhel	el Normal	LHC Nawab Ali No.670 Naib Court 0315-7217117	J. FC Muhammad Abid No.1160 Police Lines 0342-5988242	lHW Musarat Begum 0313. 9121792	Bakht Rawan Chowkidar 0313- 9256589	Sebiha Begum SS ISLAMIYAT (BPS-17) GGHSS AZA KHEL PAYAN, NOWSHERA 0303-8745064
Azakhei	i Normai	HC Zahid Ali No. 1068 Naib Court 0333-9359982	V 1 FC Zia Ur Rahıman No. 1172 Police Lines 0317-9301756		Amjad Khan Chowkidar 0315-4384204	Muhammad Israr, SSS[Civics] GHSS Pir PiaiNowshera
Azakhel	Normal	LHC Akbar Ali No. 533 Naib Court 0333-9193691	1.FC Imdad Hussain No.1180 Police Lines 0313-9171957		Faisal Hayat GGHSS Azakhel Payan	FAZAL-E-JAWAD SST (Science) GHSS Azakhel Payan NSR 3347578643
Azakhel	Normal	FC Saad Sajjad No.521 PP Pirsabaq 0315-9245869	1.fC Khan Muhammad No.1197 Police Lines 0311-8200382	LHW Arra 0334-1929086	Mushtao Chewkidar 0301-8185053	SHABANA BIBI SS URDU GGHSS AZAKHEL PAYAN







Tel No. 0923-9220102 & Fax No. 0923-9220103 Email dpo_nowsherakpk@yahoo.com



No. 35// /PA Dated 1/1/2 /202

Mr. Touheed Ullah

OSP Security, Nowshera

FACT FINDING INQUIRY

A complaint was received to the undersigned wherein complainant highlighte that a person namely Sifat Ullah s/o Farzand Ali r/o Kheshgi Bala, who is a School teache appeared for other candidates in ETEA test held for recrultment of police constables. Complainar further stated that Zia-ur-Rahman, Muhammad Abbas and Muhammad Abid sohs of Inam Allege their test passed through the aforementioned Sifat Ullah and Sifat Ullah for each candidate receive Rs:600000/-

You are hereby directed to conduct fact finding enquiry into the matter an submit report to undersigned immediately.

District Police Officer, Nowshera

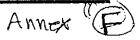
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2021

Fel_iNa, 8923-9220109 & Fax No. 6923-9220103



The District Police Officer. Nowshera

.o. 1496 St. dated Nowsherathe 24 / 12 /2021.

Subject: Memo: . FACT FINDING INQUIRY

Kindly refer to your office letter No.3511/PA, dated 10.12.2021.

It is submitted than an anonymous complaint was filed against newly enlisted constables. Zia Ur Rehman No.1172. Muhammad Abbas No. 1145 and Muhammad Abid No.1160 with the allegations that above mentioned constables passed their ETEA exams through fraudulent means and a person namely Sifatullah s/o Farzand Ali r/o Kheshgi Bala, who is a school teacher was hired for total of 18 Lac rupees-to pass them. The anonymous applicant requested for fair action against the above mentioned newly enlisted constables.

In this regard, a fact finding inquiry was entrusted to the undersigned vide letter No.3511/PA dated 10.11.2021 along with enclosure. After perusal of the enquiry documents it was noted that already a letter was submitted vide letter No.144/Legal dated 26.11.2021 to the director ETFA. Peshawar for provision of information in the matter and cooperation. Another letter vide No.1463 S dated 14.12.2021 and addressed to the director ETFA for provision of the following information.

- 01. Recruitment/ Exam SOPs
- 02. Criteria for allotment of roll numbers to the candidates and to explain how 04 persons three brothers roll numbers were allotted in order.
- Complete details of recruitment process of the below mentioned 04 eandidates.
 - 01. Sitat Ullah s/o barzand Ali r/o Nowshera
 - 02. Zia Ur Rehman s/o Inam Ali r/o Nowshera
 - 03. Muhammad Abbas s/o fnam Ali r/o Nowshera
 - 04. Muhammad Abid s/o Inam Ali r/o Nowshera

Reply from the deputy director LT ETEA was received vide letter No .ETEA/2-45/P.C/2020-21/6319 dated 20.12.2021 where all the relevant data requested were provided (copy attached).

The undersigned called the alleged constables to his office wherein they submitted their written reply and they were cross questioned also and they denied the allegations leveled against them. The alleged school jeacher Sifatullah s/o Farzand Ali r/o Kheshgi Bala was also called to the office and his statement was recorded wherein he stated that he is presently SST teacher (grade 16) at Government High School, ASC Nowshera, previously he remained as constable and a junior clerk in Police department and he applied for the job of police constable just for the sake of getting knowledge, experience regarding the subject test as he offers coaching to the interested



bullah is also in waiting list at S.No. 135. Similarly, statement of Khalil Khan r/o Kheshgi gan stop Shaheen computeg was also recorded.

ÁNDINGS:

From the above discussions evidence/ data received from ETEA and statements recorded the undersigned noted the following points:

- In Video clip provided by ETEA authorities (USB enclosed) it was noticed that all the above mentioned alleged candidates themselves appeared in the exams.
- According to ETEA report all the above mentioned 04 candidates wrote/mentioned their D.O.B as 01.01.1998 including 03 brothers in their online applications form of police constables and ETEA authorities allotted them roll number on date of birth field / column from oldest to newest. Similarly, in physical measurement/ physical endurance test for recruitment / written test for recruitment of constable, police department advertised in September, 2020, they were provided roll numbers in order as per their date of birth. During enquiry when the alleged persons were asked about their similar date of birth they replied that they have not applied themselves rather their apply forms were submitted by a person namely Khalil owner of Shaheen computer Kheshgi payan and Constable Muhammad Abid disclosed in his statement that his real D.O.B is 01.01.1998 as shown in the apply form while Khalil Khan owner of Shaheen computer in his statement disclosed it as human nusiake.
- During enquiry, when alleged Sifatullah was cross questioned it was noticed that he is presently serving in grade 16 as SST teacher and he already two times left the job of Police constable and junior clerk in EPTC, Nowshera which clearly support the aflegations levelled that why a person who is grade 16 applies for the post of constable grade 07.

CONCLUSION

Form what have been discussed the undersigned reached to the conclusion that all the alleged three brothers newly enlisted constables and Sifatullah school teacher have planned and deliberately provided wrong information to ETEA while submitting their online forms and hide their real date of birth and qualifications just to fulfilled their ulterior motive, and they succeeded in their plans to usurp the rights of others merit qualifiers. From the attached evidence it is crystal clear that the above mentioned constables used fraudulent means to pass their exams and the role of ETEA authorities cannot be ruled out as similar type of technical planning cannot be done without the support of someone having links in ETEA office. Silatullah SST teacher has played a vital role and who being posted on grade 16 applied for 07 grade is not plausible to a prudent mind. Moreover, during enquiry it has also been learnt that the said Sifatullah usually appears in the ETEA exams in order to help other candidates in passing their exam and for such notorious practices he collects / receives handsome amount. Hence, it is, suggested that District Education Officer, Nowshera may be siddressed to initiate proper departmental action against Sifatullah (SST Teacher). In order to stop such type of practices and to safeguard/protect the rights of merit of ETEA qualifiers the undersigned suggests the above mentioned newly enlisted constables for major punishment, if agreed, please

Encl. (23)

Deputy Superintendent of Police · Headquarters Nowshera



Annex (G)))

FINAL SHOW CAUSE NOTICE:

Whereas, you Recruit Constable Zia-Ur-Rahman No. 1172, while posted at Police Lines, Nowshera. A complaint was received to the undersigned wherein complainant highlighted that a person namely Sifat Ullah s/o Farzand Ali r/o Kheshgi Bala, who is a School teacher, appeared for other candidates in ETEA test held for recruitment of police constables. Complainant further stated that you Recruit Constable Zia-Ur-Rahman No. 1172, s/o of Inam Ali got your-test-passed-through-the-aforementioned-Sifat-Ullah-and-Sifat-Ullah-received-Rs;600000/-from you.

A fact finding enquiry was entrusted to DSP Security. Nowshera into the matter who after fulfillment of legal formalities and submitted his report to the undersigned vide his office letter No. 1496/St dated24.12.2021, wherein he highlighted that you being newly enlisted recruit constable and Sifat Ullah School teacher have planned and deliberately provided wrong information to ETEA authority while submitting your online form and hide your real date of birth and qualification just to fulfilled your ulterior motive and you were succeeded in your plans and usurp the right of others merit qualifiers. He further stated that from all the evidence it is crystal clear that you recruit constables used fraudulent means to pass your exam, therefore, recommended you for major punishment.

On 28.12.2021 you were heard in person, but failed to satisfy the undersigned regarding the following:

- You are giving same date of birth to ETEA to ensure that you having seat with each other in exam while in reality your date of birth are different.
- A BPS-16 Govt: teacher sat with you in hall who put a wrong date of birth i.e the same as you entered just to ensure that he sit with you. It goes against reason that a BPS-16 serving Govt; employee is applying for BPS-07 job, and to add to it, he was found to be your relative/ villager by entering same date of birth has been able to get seat with you and did not solve his own paper and falled it. In all probability, he was there to assist you.
- That you failed to answer to the undersigned basic English translation which the undersigned read out from ETEA paper, surprisingly you answered it correctly in the paper.
- You have no idea regarding basis Pakistan history questions regarding Pakistan resolution, founder of Muslim League etc.
- Upon confrontation with the question that you known the school teacher named Sifat
 Ullah. You said that he is just our villager, however we have no contact with him,
 however, as per CDR on test day you have made 03 calls with him and you have also
 conversation with him at other time as well.

Therefore, it is proposed to-impose Major/Minor penalty including dismissal as envisaged under Rules 4(b) of the Khyber Pakhtunkhwa Police Rules 1975.

Hence, I, Imran Khan, PSP, District Police Officer, Nowshera, in exercise of the powers vested in me under Rules 5(3) (a) & (b) of the Khyber Pakhtunkhwa Police Rules 1975, call upon you to Show Cause finally as to why the proposed punishment should not be awarded to you.

Your reply shall reach this office within 07 days of the receipt of this notice, failing which, it will be presumed that you have no defense to offer.

You are at liberty to appear for personal hearing before the undersigned.

District Police Officer,
Nowshera

No. 7/8 /PA, Dated 28/12/2021

WITH RESPECT,



Annex

m 4/1,

To,

DISTRICT POLICE OFFICER NOWSHERA.

SUBJECT:

Reply Of Show Cause On Behalf Of Zia Ur Rehman S/O Inam Ali

R/O Kheshgi Bala Tehsil & District Nowshera.

It is in response to the show Cause Notice Issued by your kind honor vide your office letter No. 718/PA dated 28.12.2021.

R/Sheweth:

• That the Date of Birth wasn't deliberately filled same but was mistakenly and unintentionally filled wrong in ETEA Online Forms by Shaheen Computers Kheshgi Payan who personally admitted it to us that it might be done mistakenly during Filling the Forms as there are hundreds of forms to be filled. Secondly the same mistake was brought in the Notice of ETEA Administration for whom they assured that it wasn't a serious issue and can be rectified at the time of verification of documents. Moreover, it is more negligence of the ETEA for which we are penalized.

• As far as a Govt Teacher namely Sifat Ulla his concerned, we don't know for what and why he appeared In test. It is something irrational that we are asked for those questions which can solely be answered by him. As of my statement that he is our villager is cent percent based on reality. Moreover, skepticism that he assisted you, is unrealistic and far from reason that he assisted us in presence of ETEA Staff.

• Thirdly, of the questions you asked, were roughly in a tense environment where on we were traumatized and threatened. We were time and again warned of Dismissal from service, firstly by DSP Security during conduction of enquiry and every second person in Police Lines that you are going to be dismissed. It seemed more like a trail for punishment rather than enquiry.

• Fourthly, for the answer that Sifat Ullah is our villager is the reality and I haven't denied any contact with him. And about the contact on the test day we had an accident with police personnel serving under your kind command and can been quired. Which was witnessed by several villagers. The contact was made in connection to enquire about the casualties.

 Fifthly, it is alleged that impersonation was carried out during test which turned to be baseless.

IT IS THEREFORE REQUESTED TO KINDLY CONSIDER MY CASE AND KÎNDLY FILE THE SHOW CAUSE NOTICE AGAINST ME. I WILL PRAY FOR YOU LONG PROSPEROÚS LIFE.

Yours obediently / sincerely

ZIA UR REHMAN, BELT NO.1172

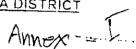
Dated: 03-01-2022

Must (3 Ch) 4 (2 n620 03/022.

PARTMENT



NOWSHERA DISTRICT



DISMISSAL ORDER

A complaint was received to the undersigned wherein complainant highlighted that a person namely Sifat Ullah s/o Farzand Ali r/o Kheshqi Bala, who is a School teacher, appeared for other candidates in ETEA test held for recruitment of police constables. Complainant further stated that Recruit Constables Zia-ur-Rahman No. 1172, son of Inam Art 301 his test passed through the aforementioned Sifat Ullah and Sifat Ullah received Rs:600000/ from him.

A fact finding enquiry was entrusted to DSP Security. Nowshera into the matter who after fulfillment of legal formalities and submitted his report to the undersigned vide his office letter No. 1496/St. dated24.12.2021, wherein he highlighted that he newly enlisted recruit constable and Sifat Ullah School, teacher have planned and deliberately provided, wrong information to ETEA authority while submitting, his online form and hide his real date of birth and qualification just to fulfilled his ulterior motive, and he succeeded in his plan and usurp the right of others merit qualifiers. He further stated that from all the evidence it is crystal clear that the above mentioned recruit constable used fraudulent means to pass his exam, therefore, recommended that he may be awarded major punishment.

On 28.12.2021 he was heard in person, but failed to satisfy the undersigned regarding the following:

- He is giving same date of birth to ETEA to ensure that the said teacher having seat with him in exam while in reality their date of birth are different.
- A BPS-16 Govt: teacher sat with him in hall who put a wrong date of hirth to the same as him entered just to ensure that he sit with him. It goes against reason that a BPS-16 serving Govt; employee is applying for BPS-07 job, and to add to it, he was found to be his relative/ villager by entering same date of hirth has been able to get seat with him and did not solve his own paper and failed it. In all probability, the was there to assist him.
- That he failed to answer to the undersigned basic English translation which the undersigned read out from ETEA paper, surprisingly his answered it correctly in the paper.
- He has no idea regarding basic Pakistan history questions regarding Pakistan resolution, founder of Muslim League etc.

Upon confrontation with the question that he known the school teacher named Sifat Ullah. He said that he is just his villager, however he has no contact with him, however, as per CDR on test day he made 01 call with him and he has also conversation with him at other time as well.

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

On 20 12 2021 he was heard by the jindersigned, wherein he failed to produce any cogent reason in his defense, therefore, he is hereby awarded major punishment of dismissal from service from the date of enlistment i.e. 09.12.2021, in exercise of the powers vested in me under Police Rules, 1975.

OB__/*3&5*_

Dated 2 9//2 /2021.

District Police Officer, Nowshera.

No. 3663-68/PA, dated Nowshera, the 27/12/2021.

Copy for information and necessary action to:

- DSP HQrs; Nowshera.
- 2. Pay Officer.
- 3. E.C.
- 4. OHC.
- 5. FMC with relevant papers (63 sheets)
- 6. I/C Computer Lab.

Ahnex I

To

Regional Police Officer, Mardan Region, Mardan.

Subject:

Departmental appeal against the order dated 29.12.2021, whereby the undersigned has been awarded the major punishment of dismissal from service by the DPO, Nowshera.

Prayer in departmental appeal:

On acceptance of this appeal the impugned dismissal order dated 29.12.2021, may please be set aside and I may kindly be reinstated into service with all back benefits.

Respected Sir,

The applicant very humbly submits the following few lines for your kind and sympathetic consideration:

- 1. That various posts of police constable BPS-7 has been advertised which are also uploaded on ETEA website seeking applications from desirous candidates wherein last date of submission of application was shown 30.09.2020.
- 2. That I, having the qualification of intermediate, duly applied for the post so advertised through online application thereafter roll number was issued to me which was conducted by educational testing and evaluation agency(ETEA) Peshawar. I duly appeared in the test and fortunately qualified the test, I also undergone the physical test and was successful in physical test also.
- 3. That being successful in screening test and physical endurance test I was duly appointed by the competent authority on the recommendations of duly constituted departmental selection committee.
- 4. That after appointment the undersigned took charge of his post and started performing his duties.
- 5. That while performing his duties in the said capacity, a fact finding inquiry was conducted on some anonymous complaint having baseless and false allegations against the applicant.

- 6. That the applicant appeared in the fact finding inquiry and denied all the allegations however the inquiry officer in partial manner conducted the inquiry and submitted his report merely on the bases of surmises and conjecture and held him guilty of all charges.
- 7. That without issuing the fact finding inquiry report or without issuing any charge sheet and without conducting any regular inquiry the undersigned was issued final showcause notice on 28.12.2021 giving 7 days to applicant to submit his reply if he wants to do so.
- 8. That quite astonishingly and illegally without waiting for reply of the undersigned on the very next day he was awarded the major penalty of dismissal from service vide office order dated 29.12.2021.
- 9. That on 03.01.2021 when the applicat went to the office of DPO Nowshera to submit his reply to showcause notice he was handed over his dismissal order.
- 10. That the impugned order is illegal unlawful against the law and facts hence liable to be set aside inter alia on the following grounds:

GROUNDS OF DEPARTMENTAL APPEAL

- A. That I have not been treated in accordance with law hence my rights secured and guaranteed under the law and constitution is badly violated.
- B. That no proper procedure has been followed before the dismissal order dated 28.12.2021, no charge sheet has been served upon me nor any regular inquiry has been conducted. Only a fact finding was conducted and that too in a very partial and biased manner, thus the impugned order is liable to be set aside on this score alone.
- C. That I have not been given opportunity of personal hearing before the issuance of the impugned order hence I have been condemned unheard.
- D. That I duly applied for the post, appeared in screening and physical test and remained successful, I duly took over charge of my post and started performing my duties, thus the order of my appointment has been acted upon and valuable rights has been created in my favour. As principle of LOCUS PONATENTIE strongly lies in my favor so my service could not be snatched away illegally with one stroke of pen.

- E. That I was appointed by the competent authority after observing all codal formalities, no illegality or irregularity has been committed in the process of appointment.
- F. That the inquiry officer had admitted during his report that the applicant along with other dismissed candidates himself appeared for the examination. It is pertinent to mention here that during the fact finding inquiry, it was never proved that the paper of the applicant was actually filled by one Sifatullah or that the said Sifatullah had helped the applicant in solving his paper, though in his inquiry report he, without any proof or justification concluded that the applicant used illegal ways to pass his exams. Thus the whole precedence conducted against the applicant prior to his dismissal were illegal and defective in nature and thus not sustainable in the eye of laws.
- G. That so far as putting wrong entry of date of birth in application form is concerned, it was submitted to the inquiry officer that the applicant did not himself fill his form rather it was filled by a person sitting in Shaheen Computers Kheshki Payan who mistakenly and unintentionally put wrong entries in his online form who personally appeared before the inquiry officer and admitted his mistake as there were hundreds of forms to be filled by him on that day it is pertinent to mention here that after noticing his mistake the applicant himself brought it to in the notice of ETEA Administration however the applicant was replied that it was not a big issue and can be rectified at the time of verification of documents.
- H. That if all there was any irregularity committed in the process of submission of online forms, the same can neither be attributed to the undersigned nor can he be punished for the faults or lapses committed by others.
- I. That the applicant was appointed after the rigors of selection process by the competent authority on the recommendations of duly constituted departmental selection committee and he after appointment took charge of his post so valuable rights has been accrued in the favor of applicant which can not be snatched through any illegal means.

- J. That I have never committed any act or omission which could be termed as misconduct, albeit he was awarded major penalty of dismissal from service.
- κ. That the appellant is young and energetic and wants to service for his department albeit his career has been stigmatized by the impugned dismissal order.

It is, therefore, humbly prayed that on acceptance of this departmental appeal the impugned order dated 29.12.2021, may please be set aside and I may be reinstated into service with all back benefits.

Yours Obediently,

Muhamme Abbas Ex-Constable 1145 Police Lines Nowshera

Dated ___10/12/2022



Annex



ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Recruit Constable Zia Ur Rehman No. 1172 of Nowshera District against the order of District Police Officer, Nowshera, whereby he was awarded major punishment of dismissal from service vide OB: No. 1306 dated 29.12.2021 by the District Police Officer, Nowshera. The appellant was proceeded against departmentally on the allegations that a complaint was received to the District Police Officer, Nowshera wherein complainant highlighted that a person namely Sifat Ullah s/o Farzand Ali r/o Kheshgi Bala, who is a School teacher, appeared for other candidates in ETEA test held for recruitment of Police Constables. Complainant further stated that Recruit Constables Muhammad Abid No. 1160, son of Inam Ali got his test passed through above named teacher who in return received Rs;600,000/ from him.

A fact finding enquiry was entrusted to DSP Security, Nowshera into the matter who after fulfillment of legal formalities, submitted his report to the District Police Officer, Nowshera, highlighted therein that the newly enlisted recruit Constable (appellant) and Sifat Ullah School teacher have planned and deliberately provided wrong information to ETEA authority while submitting his online form and hide his real date of birth and qualification just to get appointed as Constable through such illegal means. Resultantly he succeeded in his plan and usurp the right of others merit qualifiers. He further stated that from all the evidence it is crystal clear that the above mentioned recruit constable used fraudulent means to pass his exam, therefore, recommended that he may be awarded major punishment.

On 28.12.2021 he was heard in person, but failed to satisfy the Distirct Police Officer, Nowshera regarding the following issues:

- 1. He is giving same date of birth to ETEA to ensure that the said teacher having seal with him in exam while in reality their dates of birth are different.
- 2. A BPS-16 government teacher sat with him in hall who put a wrong date of birth i.e the same as he (appellant) entered just to ensure that he sit with him. It goes against reason that a BPS-16 serving government employee is applying for BPS-07 job, and to add to it, he was found to be his relative/ villager by entering same date of birth has been able to get seated with him and did not solve his own paper and failed it. In all probability, he was there to assist him.
- 3. He failed to answer to the District Police Officer, Nowshera question regarding basic English translation which he (District Police Officer, Nowshera) read out from ETEA paper. However, surprisingly the appellant answered it correctly in the paper.
- 4. He (appellant) has no idea regarding basic Pakistan History questions regarding Pakistan Resolution, founder of Muslim League etc.
- 5. Upon confrontation regarding relation of the appellant with the said School teacher namely Sifat Ullah. He (appellant) said that he is just his villager, however, he has no contact with him. As per CDR on test day, the appellant made call to him and remained in conversation.

He was issued Final Show Cause Notice, to which his reply which was received/perused and found unsatisfactory. On 29.12.2021 he was heard by the District Police Officer, Nowshera, wherein he falled to produce any cogent reason in his defense, therefore, the appellant was awarded major punishment of dismissal from service from the date of enlistment.

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 15.03.2022.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. As during the course of enquiry it has been established that the appellant has used unfair means to get enlisted in Police Department by making intentionally/deliberately wrong entry of his date of birth just to make seat arrangement with above named teacher. Besides, the appellant has also been booked in a criminal case being involved in cheating vide case FIR No. 95 dated 28.01.2022 u/s 419/420-PPC Police Station, Nowshera Kalan. Hence, the involvement of appellant in such like activities is clearly a stigma on his conduct because from the very initial stage the appellant has managed to get appointed in Police Department through unlawful and illegal means. Therefore, the retention of appellant in Police Department will stigmatize the prestige of entire Police Force as instead of fighting crime, he has himself indulged in criminal activities. Moreover, he could not present any cogent justification to warrant interference in the order passed by the competent authority.

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. 3565 /ES, I	Dated Mardan the	50/03	/2022.
• Copy forward	led to District Police	Officer; Nowshera	for information and
necessary w/r to his office	Memo No 136/PA	dated 25.01.2022. H	is Service Record is
necessary wit to his office	WICH TO THE		
returned herewith.			

*****)

Application under The to "Information The Dista police Officer ploushera Subject: - Information required under The righ to information Act 2012/13 KPK. Kindly provide me with the sollowing impormation required under the Right to impormation Act 2012/13 KPK All inquirey Report about the Innee constable (police) namely Mulummad Stord bett No- 1160 Zia ur Rehman bell no-1172 - Muhmmad Abas Bett No-1145 Bearing Latter No- 1496/st Dated

is) Complaint wong with termination order

(ii) Complaint when document about

(ive inquery).

(iv) provide, attendence sheet of namely above constable.

your Impormation in this regard

Will be highly appreciated

by The petitioners

yours factified.

Inam Ale s/o Samar Gul
R/o Raheem Wah Korena
VIH. Kheshqi Bala Teh & Dist.
Nowshork.



POWER OF ATTORNEY

Zia un Rehman		- For Plaintiff Appellant V
Govt of KOL		l Petitioner l Complainant
	,	Defendant Respondent Accused
Appeal/Revision/Suit/Application/Petition/Case No.	of	.1
YASIR SALEEM ADVOCATE HIGH attorney, for me in my same and on my behalf to appe	Fixed for	
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Advocate Fligh Court
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR DAW CONSULTANT
FR. J. Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cami