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BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE

TRIBUNAL PESHAWAR

Khyber Paightolehwa Service Telhainal

Service Appeal No. 625/2022

Zia-ur-Rehman Ex-Constable Polie Lines, Nowshera.

Diary No. <u>2990</u>

Diated 7-2-2023

V ERSUS

Provincial Plice Officer, Khyber Pakhtunkhwa, Peshawar and others.

.....Respondents

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Inspector Legal, Nowshera



BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 625/2022

Zia-ur-Rehman Ex-Constable Polie Lines, Nowshera.

.....Appellant

V ERSUS

- 1. Provincial Plice Officer, Khyber Pakhtunkhwa, Peshawar.
- 2. Regional Police Officer, Mardan.
- 3. District Police Officer, Nowshera.

.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS 1,2&3

Respectfully Sheweth: -

PRELIMINARY OBJECTIONS: -

- 1. That the appellant has got no cause of action and locus standi to file the instant appeal.
- 2. That the appeal is badly barred by law and limitation.
- 3. That the appellant is estopped by his own conduct to file the instant appeal.
- 4. That the appeal is not maintainable in its present form.
- 5. That the appellant has not come to the Honourable Tribunal with clean hands.
- 6. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.

Reply on Facts: -

- 1. Para pertains to record hence, needs no comments.
- Para to the extent of qualification of appellant pertains to record while rest of the para is incorrect as appellant got his ETEA examination passed through unfair means.
- 3. Incorrect. Though name of the appellant was placed amongst qualified candidates, however, it was later on learnt that the appellant had used unfair means for passing his written test.
- 4. Para not related hence, needs no comments.
- 5. Incorrect. A complaint was received to the then 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 Zia-ur-Rehman, Muhammad Abbas and Muhammad Abid sons of Inam Ali got their test

passed through the aforementioned Sifat Ullah and Sifat Ullah for each candidate received Rs. 600,000/-. (Copy of complaint is annexure "A"). In order to ascertain facts, a fact finding enquiry was conducted through the then DSP Hqrs:, Nowshera who conducted a comprehensive enquiry wherein the enquiry officer highlighted that according to ETEA report, appellant as well as his 02 brothers and 01 person namely Sifatullah while submitting online application forms wrote/mentioned their date of birth as 01-01-1998 and ETEA authorities allotted them number on 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 appellant 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 mistake. Similarly, 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 allegations leveled that why a person who is grade 16 applies for the post of constable grade 07. Hence, the enquiry officer recommended the appellant and his brothers for major punishment. (Copy of enquiry papers is annexure "B").

- 6. Incorrect. During the course of enquiry, enquiry officer collected all relevant material from the ETEA authorities and in the light of that material, the appellant was recommended for major punishment. (Copies of relevant papers are attached with the enquiry report).
- 7. Incorrect. On 28-12-2021, appellant was issued Final Show Cause Notice to which he submitted his reply on 29-12-2021, but the same was found unsatisfactory, hence, was awarded major punishment of dismissal from service. (Copy of Final Show Cause notice and reply are annexure "C").
- 8. Para already explained above.
- 9. Para correct to the extent that against the punishment order appellant moved departmental appeal before the appellate authority and the same was filed by the appellate authority on 30-03-2022, being devoid of merit.
- 10. Orders passed by the respondents are in accordance with law hence, are liable to be maintained inter-alia on the following grounds: -

Reply on Grounds

- A. Incorrect. Appellant has been treated in accordance with law and rules.
- B. Incorrect. Proper fact finding enquiry was conducted against the appellant and during the course of enquiry solid material was collected from the ETEA authorities. Before awarding punishment appellant was issued Final Show Cause Notice to which he submitted his reply but the same was found unsatisfactory.
- C. Incorrect. Appellant was issued Final Show Cause Notice on 28-12-2021 and on 29-12-2021, he submitted reply to the same.
- D. Para already explained above.
- E. As replied above.
- F. Incorrect. Before awarding punishment, appellant was heard in person in orderly room wherein he failed to produce any cogent reason in his defense.
- G. Para already explained above.
- H. Para correct to the extent that appellant was appointed in the respondent department but later on it was learnt that he had used unfair means for induction in Police Department.
- Incorrect. Though the appellant, his brothers and one Sifatullah, who was a school teacher in BPS-16, appeared in the ETEA test/exam however, they made such seating arrangement by providing same date of birth i.e 01-01-1998, while submitting their online applications that appellant's brother namely Muhammad Abbas was 1st seated, behind him was Sifatullah (Teacher) and behind Sifatullah was appellant's brother Muhammad Abid and in the last was appellant respectively. Sifatullah (teacher) helped them in solving their papers while he himself intentionally failed the ETEA test as he was already working in BPS-16.
- J. Incorrect. It is not appealable to a prudent mind that a person, who as stated by the appellant filled their forms on computer, made wrong entry only to the extent of date of birth of 03 candidates. They mentioned the same date of birth i.e 01-01-1998 only with the intention to be seated in sequence.
- K. Para already explained above.
- L. Para already explained above.
- M. Para already explained above.
- N. Para already explained above.
- O. The respondents also seek permission of this Honourable Tribunal to advance additional grounds at the time of arguments.

Prayers

It is, therefore, most humbly prayed that on acceptance of above submissions, the appeal of the appellant may very kindly be dismissed with costs, please.

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

Respondent No. 01

Regional Police Officer, Mardan. Respondent No. 02

District Police Officer, Nowshera. Respondent No.03

BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 625/2022

Zia-ur-Rehman Ex-Constable Polie Lines, Nowshera.

.....Appellant

V ERSUS

- 1. Provincial Plice Officer, Khyber Pakhtunkhwa, Peshawar.
- 2. Regional Police Officer, Mardan.
- 3. District Police Officer, Nowshera.

7 FEB 2023

.....Respondents

AFFIDAVIT

We the respondents No. 1, 2 & 3 do hereby solemnly affirm and declare on Oath that the contents of reply to the appeal are true and correct to the best of our knowledge and belief and nothing has been concealed from the Honourable tribunal.

Provincial Police Officer Khyper Pakhtunkhwa,

Respondent No. 01

Regional Police Officer, Mardan. Respondent No. 02

istrict Police Officer, Nowshera.

Respondent No.03

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بحضور جناب OPDماعب نوشهره

-: الأدبان

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- نةر ري

OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE HEADQUARTERS NOWSHERA

Tel No. 0923-9220109 & Fax No. 0923-9220103

0 2 1

To:

The District Police Officer, Nowshera.

No. 1496 /St: dated Nowshera the 24 / 12 /2021.

Subject:

FACT FINDING INQUIRY

Memo:

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

It is submitted that 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 ETEA, Peshawar for provision of information in the matter and cooperation. Another letter vide No.1463/S dated 14.12.2021 was addressed to the director ETEA 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.
- 03. Complete details of recruitment process of the below mentioned 04 candidates.
 - 01. Sifat Ullah s/o Farzand Ali r/o Nowshera
 - 02. Zia Ur Rehman s/o Inam Ali r/o Nowshera
 - 03. Muhammad Abbas s/o Inam Ali r/o Nowshera
 - 04. Muhammad Abid s/o Inam Ali r/o Nowshera

Reply from the deputy director I.T 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 teacher 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 as 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

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

EINDINGS

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

- 01) 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 mistake.
 - 03) 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 allegations 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. Sifatullah 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 addressed 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: (&3)

Deputy Superintendent of Police Headquarters Nowshera



GOVERNMENT OF KHYBER PAKHTUNKHWA

Educational Testing & Evaluation Agency (ETFA) Peshawar

Dated: (8/12/2021

NO. ETE N/4-3/Mise./

The District Police Officer (DPO) Nowshera

Subject:

 T_0

COMPLAINT

Dear Sir,

I had directed to refer to your letter No. 1254 dated 30/11/2021 on the subject cited above and to enclose her with the required accument a. desired please.

Deputy Director (Admin)

ne Director (Admin & Finance), ETEA P.A to Executive Director ETEA

Deputy Director (Admn)

halfman, Board of Givernors: Chief Minister Khyber Pakhtunkhwa

3, Physe-VII, Hayavebad, Peshawar. Phone: (991) 9219049-78 Fax: 091. Web Site wew elec edu pk email: info@elea.edu px 9219030



OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE HEADQUARTER, NOWSHERA



To:

The Director,

Educational Testing & Evaluation Agency,

(ETEA), Peshawar,

No. 1463

/S, Dated Nowshera the 14/12 /2021.

Subject:

PROVISION OF EVIDENCE/RECORDING OF

<u>STATEMENTS IN FACT FINDING ENQUIRY AGAINST</u>

NEWLY ENLISTED CONSTABLES.

Memo:

It is submitted that the undersigned was nominated as enquiry officer for conducting fact finding enquiry, (copy attached), the following information is urgently required to this office.

- Recruitment/Exam SOPs.
- 2. Criteria for allotment of Roll Number to candidates.
- Complete details of the following candidates:
 - i. Zia ur Rehman s/o Inam Ali r/o Nowshera
 - ii. Muhammad Abid s/o Inam Ali r/o Nowshera
 - iii. Muhammad Abbas s/o Inam Ali r/o Nowshera
 - iv. Sifat Ullah s/o Farzand Ali r/o Nowshera
- 4. Advertisement of recruitment, copies of candidate's application and documents submitted, roll number/call letter for written/physical test question paper/ solved papers of the above mention candidates.
- 5. Explanation of how, in 04 person three brothers roll number were allotted in order.
- 6. Please nominates an responsible official for statement recording to the enquiry officer.

Your cooperation in this regard will be highly appreciated.

OF

DEPUTY SUPERINTENDENT OF POLICE HEADQUARTER, NOWSHERA



Khyber Pakhtunkhwa Educational Testing & Evaluation Agency

NO. ETEA/2-45/P.C/2020-21/6319

Dated: <u>20-12-2021</u>

⊶To:

The DSP (HQr)
Nowshera

Subject:

PROVISION OF EVIDENCE/RECORDING OF STATEMENTS IN FACT FINDING ENQUIRY AGAINST NEWLY ENLISTED CONSTABLES

I am directed to refer to your letter No. 1463/S dated 14-12-2021 on the subject cited above and to enclose herewith copy of advertisement for recruitment and extract of Exam SOPs approved by the BoG of ETEA (Annex-I & II). It is further submitted that no allotment criterion is defined in the rules/SOPs for issuing roll numbers to the candidates and normally roll numbers are allotted by so ting the requisite data either on "Date of birth" field/column from either oldest to Newest or Newest to 0 dest or any other field/column.

Online application forms of candidates are attached as (Annex III) while Roll Number slips issued online for Physical & Written Test and copy of Quality Check form along with documents are attached (Annex IV, V & VI). Solved papers (subjective portion & Answer Sheets) have already been provided vide this office letter of even no dated 8/12/2021 while the original Question papers of the candidates have been archived soon after the declaration of re-totaling result which cannot be retrieved at this stage.

With reference to the Para-5 of your above referred letter, as explained in Para-1 above roll numbers for hysical test were allotted in sequence due to sorting the requisite data on "Date of Birth" field/column from oldest to newest while for written test roll numbers were allotted in sequence due to sorting data and picture field/column where pictures were having randomly generated names by the database and online server. In the instant case, date of birth of the candidates, as per online application form (Annex-III) is same; therefore, their roll numbers for physical test were automatically generated/allotted in order while for written test when the requisite data is sorted on "picture" field/column, the allotted roll numbers came in the same order.

The undersigned have been nominated for recording statement.

Deputy Director (1.T)

Copy to:-

• Exclusive Director ETEA

Chairman, Loard of Governors: Chief Minister Khyber Pakhainkhwa





KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY (ETEA)

Online Application Form of Police Constable (BPS-07)

NAME:

SIFAT ULLAH

FATHER/HUSBAND'S NAME: FARZAND ALI

APPLICANT CNIC NO:

1720161849145

DATE OF BIRTH:

1-JANUARY-1998

RELIGION:

MUSLIM

POLICE SON: GENDER:

NO MALE

DOMICILE:

NOWSHERA

POSTAL ADDRESS:

KHESHGI BALA, PO KHESHGI PAYAN, TEH AND DIST

NOWSHERA

PERMANENT ADDRESS:

KHESHGI BALA, PO KHESHGI PAYAN, TEH AND DIST

NOWSHERA

Educational Information:

Highest Qualification:

HSSC/ Intermediate/ A - level

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Matric / SSC	2011	855	•	1050	BISEM







KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY (ETEA)

Online Application Form of Police Constable (BPS-07)

NAME: ZIA UR RAHMAN

FATHER/HUSBAND'S NAME: INAM ALI

APPLICANT CNIC NO: 1720159918463

DATE OF BIRTH: 1-JANUARY-1998

RELIGION: MUSLIM
POLICE SON: NO
GENDER: MALE

DOMICILE: NOWSHERA

RAHEEM ULLAH KOROONA, KHESHGI BALA, PO

POSTAL ADDRESS: KHESHGI PAYAN, TEH AND DIST NOWSHERA

PERMANENT ADDRESS: RAHEEM ULLAH-KOROONA, KHESHGI BALA, PO KHESHGI PAYAN, TEH AND DIST NOWSHERA

Educational Information:

Highest Qualification: HSSC/ Intermediate/ A - level

	Dëgree ,	Passing Year	Obtained Marks	Total Marks		Board	
•	Matric / SSC	2018	628		1100	BISEM	









KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY (ETEA)

Online Application Form of Police Constable (BPS-07)

NAME:

MUHAMMAD ABBAS

FATHER/HUSBAND'S NAME: INAM ALI

APPLICANT CNIC NO:

1720105492443

DATE OF BIRTH:

1-JANUARY-1998

RELIGION: POLICE SON: MUSLIM

GENDER:

NO

DOMICILE:

MALE

POSTAL ADDRESS:

NOWSHERA RAHEEM ULLAH KOROONA, KHESHGI BALA PO

KHESHGI PAYAN TEH AND DIST NOWSHERA

RAHEEM ULLAH KOROONA, KHESHGI BALA PO

PERMANENT ADDRESS:

KHESHGI PAYAN TEH AND DIST NOWSHERA

Educational Information:

Highest Qualification:

HSSC/ Intermediate/ A - level

Оедсе	Ace. Carando	Opener) Care	total Marks		(Board)
Matric / SSC	2018	554 •	3	1100	BISEM







KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY (ETEA)

Online Application Form of Rolice Constable (BPS-07)

NAME:

MUHAMMAD ABID

FATHER/HUSBAND'S NAME: INAM ALI

APPLICANT CNIC NO: **DATE OF BIRTH:**

1720103598981 1-JANUARY-1998

RELIGION:

MUSLIM

POLICE SON.

NO

GENDER:

MALE

DOMICILE:

NOWSHERA

POSTAL ADDRESS:

RAHEEM ULLAH KOROONA, KHESHGI BALA? PO

KHESHGI PAYAN, TEH AND DIST NOWSHERA

PERMANENT ADDRESS:

RAHEEM ULLAH KOROONA, KHESHGI BALA, PO

KHESHGI PAYAN, TEH AND DIST NOWSHERA

Educational Information:

Highest Qualification:

HSSC/ Intermediate/ A - level

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Matric / SSC	2015	527	۵	1100	BISEM



RECRUITMENT OF POLICE CONSTABLES/ TRAFFIC WARDEN CO. STABLES' KHYBÉR PAKHTUNKHWA, POLICE DEPARTMENT

ROLL NO. 65367 NAME. S	IF AT UCLA	H Colo
ANSWER SHEET SERIAL NO. 436337	signature.	fulat
TOTAL TIME: 30 MINUTES		MAX MARKS: 20
TRANSLATE INTO FORMAL URDU	FORMATION OF SENT	ا. (عملون کو درست ترتیب دس) ENCES (عملون کو درست ترتیب دس)
1) My father has been drawing pension since 2010.	- c. i. s.	1) آپ ^{انھی} کیا کریں گے یاد پال پٹا کس ہے
1 have been working since morning.		2) - گاویکه بیراز نی گرگیان که
U5. 11. 9 16 co got or		
3) We do not know their names.		 آپ کے گُن بی گاتا ہے وہ تو ہر وقت۔
EU GO (LE OI F		
4) Go with me outside.		۱۷ - دریا تیرروی مخنی مجهل میں
Le pluste 2 mg	0	
5) I am ill.		 بهار کا موسم پُر نا تیر ہے ہوتا پہت۔
- 45,160	30	<u> </u>
		ا جيميا نه لگ ميماسرمه لگا كرود آنكه .
TRANSLATE INTO ENGLISH		
She wants to work with you.	•	بان پر کمیل کر لڑی وئ ننی ہماری۔
7). يهال يرب ما تعاري	/ <u> </u>	1/2 et
Hay here with me.	ليس فروب	تمام سواول سے بازی لے میاسول جارا
8) ام سب سے ہوئے ہیں۔ ا	ی درزش ہے دوا۔	جو با قاعداً کی سے کی جاتی ہے۔ سبے ای
9) يەپىيەا ئى جىپ مىل راكىشى ـ		
		ا ، و تا التقیم انجام ہے عمل کاا جھا۔
ر ان کے بارک سے کا بات کے ایک کا سے اور	/	



RECRUITMENT OF POLICE CONSTABLES/ TRAFFIC WARDEN CONSTABLES KHYBER PAKHTUNKHWA, POLICE DEPARTMENT

ROLL NO. 65369 - NAME. 21	A UR RAHMAN
	SIGNATURE. 200 Arman
ANSWER SHEET SERIAL NO. 436339	SIGNATURE:
TOTAL TIME: 30 MINUTES	
TRANSLATE INTO FORMAL URDU	FORMATION OF SENTENCES (جلول کو درست ترتیب دی)
1) My father has been drawing pension since 2010.	1) آپ یمی کیا کریں گئے یاد پالایزاکس ہے کہ تی ہے۔
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2) I have been working since morning.	
-0 of C > (6 m 24 040	Las de Carto Company de la com
3) We do not know their names.	3) آپ کے گن بی کاتا ہے وہ توہر و ثب ۔ بریت میں ایک کاتا ہے وہ توہر و ثب ۔
- 20 00 R COVA	Gt 605 (3) 2 - 10 - 10 - 10 - 10 - 10 - 10 - 10 -
4) Go with me outside.	(۱) دریا تیرر می متنی مجهلی میں ۔ ا
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5) lamill.	 ایمار کل موسم پکر تا نیر ہے ہو تا بہت۔
- 6 % / K. O.	Lister of the property of the
	آ) چهپانه لگ نیاسر سدنگا کرده آنکه. آن
TRANSLATE INTO ENGLISH	chila stran in
6) دَوْآپِ کے ساتھ کام کرناچاہتی ہے۔ ا	7) جان پر کھیل کو لڑی فوج تھی ماری۔
She wants to wook with	Cosco des 2 1 0 2 0 1 1 1 1
and the second of the second o	 3) تمام سکولوں سے بازی لے میا عول ہمار امیں کو کھٹ _
Stay here, with me.	9 2 3 Co
We are all tired.	مسی میا فری الے گئے کہ ا جو با قاعد گاہے کی جاتی ہے سب سے اچھی درزش ہے دہ۔
	Jucol 2. c Osio:
Keep this money in your Pock	10) ہوتا ایٹھ انجام ہے مل کا چھا۔
• 7	- cet so (2) [(3) 6 ch3 - 21)
& have heard alot about you.	



RECRUITMENT OF POLICE CONSTABLES/TRAFFIC WARDEN CONSTABLES KHYBER PAKHTUNKHWA, POLICE DEPARTMENT

ROLL NO. 65368 NAME	2. Khiel Hert
ANSWER SHEET SERIAL NO. 436338	SIGNATURE. A Shol
TOTAL TIME: 30 MINUTES	MAX MARKS: 20
TRANSLATE INTO FORMAL URDU	(جملوں کو درست ترشید دی) FORMATION OF SENTENCES
1) My father has been drawing pension-since 2010.	ا) آپ بی کاکری کے یاد پالایواکی ہے کی تھے۔ ان میں ان ان ان کی ان پالایواکی ہے۔ ان
in de le solos en man en la la	3 000 00 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
2) I have been working since morning.	3 July 5 3 1 4 5 00 00
ugicy for an of in	
3) We do not know their names.	(3) آپ کے گن بی کالا ہے وہ تو ہر وقت۔ اور مرار
- in lo coité	Cole Cole Color
4) Go with me outside.	4) دریا تیر ربی تقی مچهلی میں _
St 16 glands	(3) Cr Jan 1 20 Ch
5) Lamill.	5) باركا موسم پُر تا ثير ب مونا بهت
(9 m / 16. Oct	L'externe you been
	16 جمائے لگ کیام سے اگر وہ آگھ۔ 18 جمائے لگ کیام سے اگر وہ آگھ
TRANSLATE INTO ENGLISH	Jud Jour or Many
6) وه آبرائے کام کری ای ہے۔ مام از اللہ اللہ اللہ اللہ اللہ اللہ اللہ ا	ا) بان پر کھیل کرلای فوج کھی ہاری۔
She works to the works	15 bills a not in more
Stay hole, with me	16 - Selection of the Solid Color (18)
ao 1. 1.	الله الماعد كات كاجاتى المجال المحاورز شي وور المحادث المحادر المحادر شيء المحادر المحادر المحادد المح
9) پریکھیےاریٰ جب میں رکھیں۔	18 m. Marine many for the College College
Keep his money in you	الله العالمة العام على كالجهار
(10) میں نے آپ کے بادے میں بہت نماے۔	I de la la constante
I have be alos abo	in the second second



RECRUITMENT OF POLICE CONSTABLES/ TRAFFIC WARDEN CONSTABLES KHYBER PAKHTUNKHWA, POLICE DEPARTMENT

ROLL NO. 65 366 NAME	Muhammad Abbas
ANSWER SHEET SERIAL NO. 1436336	SIGNATURE.
TOTAL TIME: 30 MINUTES	MAX MARKS: 20
TRANSLATE INTO FORMAL URDU *	[جلوں کو درست ترتیب دی) FORMATION OF SENTENCES
1) My father has been drawing pension since 2010.	ا آپ بھی کیا کریں گے یاد پالایا کس ہے کہ عی ہے۔ سکی مصع سا (وٹی اپنے
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2) I have been working since morning.	2) نی دیک میراد فی و میراد فی ایران ایران میراد و میراند و میران
3) We do not know their names.	۲۰ آپ کے مگن بی کاٹا ہے وہ تو ہر وقت۔ دُن اِن کا کاٹا ہے وہ تو ہر وقت۔
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4) Go with me outside.	
19 H & Blu Cf	BELLING WILLS
5) 1 am ill.	
TRANSLATE INTO ENGLISH	10 w 2022 20 10 20 10 10 10 10 10 10 10 10 10 10 10 10 10
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Multiple response to any Question will be treated as NCORRECT ANSWER.

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You can carry out your rough work anywhere on the question paper. Pul your pens down as soon as you hear (STOP WRITING) otherwise your paper will be canceled.

Any one found using unfair means will be disqualified.

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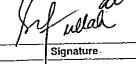
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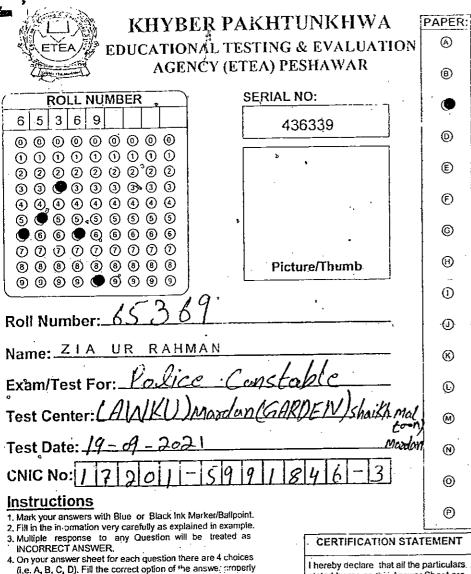
PAPER:

I hereby declare that all the particulurs stated by me on this Answer Sheet are correct to the best of my knowledge and also I have read carefully the Instructions.



ANSWERS (FILL SUITABLE CIRCLE WITH BLUE OR BLACK MARKER) 81 (A) (B) (C) (D) $AB \odot 0$ 21 (A) (B) (C) (D) 41 (A) (B) (C) (D) (A) (B) (40) (D) 82 (A) (B) °(C) (D) 42 A B C D 62 (A) (B) (C) (D) $A \oplus O \oplus$ 63 (A) (B) (C) (D) 83 'A B C O 64 A B C D @ Ø @ A ABBB85 A B C O ABCD45 A B © D ABCDABOO(A) (B) (C) (D) A 8 C D $\Theta \otimes \bigcirc \bigcirc$ ~~ 69 A B © 0 89 (A) (B) (C) (D) (A) (B) (C) (D). ABOO(A) (B) (C) (D) 51 A B C O 71 A B C O A B © 0 AB © 0 $\Theta \oplus \Theta \oplus$ AB©®: 73 AB©® **●** ® © ® A B © 0 75 A B © 0 A B C O $\bigcirc \bigcirc \bigcirc \bigcirc \bigcirc$ ABOOA B O O 7 A C D (A (B) (C) (D) ABOD17 🥝 🕲 🔘 🔘 *78 A B C O ABOD8 © 0 A B C D19 A B C D A B C O





I hereby declare that all the particulars. stated by me on this Answer Sheet are correct to the best of my knowledge and also I have read carefully the Instructions.

Devices are not allowed during examination. Defaulter will get their paper cancelled and device will be confescated. **Incorrect Way Of Filling** Correct Way Of Filling

5. You can carry out your rough work anywhere on the question paper.

8. Use of MOBILE PHONE/CALCULATOR OR ANY OTHER Electronic

6. Put your pens down as soon as you hear (STOP WRITING)

7. Any one found using unfair means will be disqualified.

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nstructions

- Mark your answers with Blue or Black link Marker/Ballpoint.
- t. Fill in the information very carefully as explained in example.
- I. Multiple response to any Question will be treated as INCORRECT ANSWER.
- I. On your answer sheet for each question there are 4 choices (i.e., A, B, C, D). Fill the correct option of the answer property (as per Example).
- 5. You can carry out your rough work anywhere on the question paper.
- 3. Put your pens down as soon as you hear (STOP WRITING) otherwise your paper will be canceled.
- '. Any one found using unfair means will be disqualified.

 3. Use of MOBILE PHONE/CALCULATOR OR ANY OTHER Electronic Devices are not knowed during examination. Defaulter will get their paper cancelled and device will be confescated.

Correct Way Of Filling

Incorrect Way Of Filling

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I hereby declare that all the particulars stated by me on this Answer Sheet are correct to the best of my knowledge and also I have read carefully the Instructions.

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KHYBER PAKHTUNKHWA

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Instructions

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- 1. Mark your answers with Blue or Black Ink Marker/Ballpoint.
- 2. Fill in the information very carefully as explained in example.
- Multiple response to any Question will be treated as INCORRECT ANSWER.
- On your answer sheet for each question there are 4 choices (i.e. A, B, C, D). Fill the conduct option of the answer property (as per Example).
- 5. You can carry out your rough work anywhere on the question paper. 6. Put your pens down as soon as you hear (STOP WRITING)
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 Devices are not allowed during examination. Defaulter will get their paper cancelled and device will be confescated.

Correct Way Of Filling

Incorrect Way Of Filling

CERTIFICATION STATEMENT

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PAPER:

I hereby declare that all the part sufars stated by me on this Answer Sheet are correct to the best of my knowledge and also I have read carefully the instructions.



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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 Gowt: 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 failed it. In all probability, he was there to
 assist you.

63 May 12 12 12 14.

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,



مخراد ماکن مشوکار و دئی حشروی خومت نعون کم صیرے نے لج دسی 68/2 Decoument en sol·lés 25 3-21 de cosés sis میں مثنا یہی کمیدی والے جملا نام خبل خان کو رہے کھے، جس 191.22 W (30 b) 201 8 60 Lis written 200, 1 2 W (30 b) عیر تعبرتی بھوا میون اور کسی کو کو تی رہے وعکرہ این دی ہے.

عسيٰ وَادِ سَّ حَوِّكَى

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