BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVI<u>CE</u> TRIBUNAL PESHAWAR

Service Appeal No. 627/2022

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Diary No. 34L Muhammad Abid Ex-Constable No. 1160 Polie Lines, Nowshera 23

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. 627/2022

Muhammad Abid Ex-Constable No. 1160 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.
- 2. 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. Para not related.
- 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.
- 1. 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 Muhammad Abbas (appellant's brother) was 1st seated, behind him was Sifatullah (Teacher) and behind Sifatullah were appellant and his other brother 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. Though appellant's date of birth is 01-01-1998 (which was correct) but the other three also mentioned the same date of birth i.e 01-01-1998 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 -

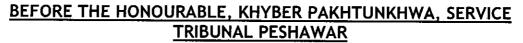
It is, therefore, most humbly prayed that on acceptance of above submissions, the appeal of the appellant may very kindly be dismissed with costs, please.

Provincial Poli Qfficer, Khyber Pakhtunkhwa, /Peshawar. Respondent No. 01

Regional Police Officer, Mardan. Respondent No. 02

1 ALA

istrict Police Officer, Nowshera. Respondent No.03



Service Appeal No. 627/2022

Muhammad Abid Ex-Constable No. 1160 Polie Lines, Nowshera.

.....Appellant

V ERSUS

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

.....Respondents

AFFIDAVIT

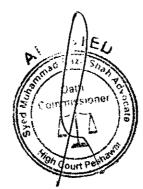
We the respondents No. 1, 2 & 3 do hereby solemnly affirm and declare on Oath that the contents of reply to the appeal are true and correct to the best of our knowledge and belief and nothing has been concealed from the Honourable tribunal.

Provincial F Øfficer. ber Pakhtunkhwa. Kh Peshawar. Respondent No. 01

Regional Police Officer, —— Mardan. Respondent No. 02

ict Police Officer,

Nowshera. Respondent No.03



7. FEB 2023

بحضور جناب DPOصاحب نوشهره

م لا بخ بنز

د: شاب على: -

اس لیے آپ صاحبان سے التجا ہے کہ آپ صاحبان ان کے خلاف قانونی کا روائی کی جائے۔ جناب اس خلاف قانو بی کاروائی کرنی چاہیے اس میں اس سکول ٹیچر کا نام بھی منشن کرتا ہوں ۔صفت اللہ ولد فرزندعلی میں غریبوں اور میر بے والوں کا حق بنآ ہے۔ جو سے ہر دور میں بید دونبر اور غیر قانو ٹی طریقوں سے غریبوں کا مود با نہ گزارش ہے کہ حال ہی میں 03 بھا کی پولیس میں بھرتی ہو کی ہے۔ اس نیس تمام کے علاوہ ان ہندوں کے اور جس بندے نے پیٹیسٹ پیپے لیے کرپاس کیا ہے ان کے تمام تبوت ہارے سكنه خویشگی بالا بنگز کی نوشهرہ ۔ جناب عالی جن جن لڑکوں نے شیہ میں اپلا کی کیا تھا اورائکی حکہ ریہ سکول دیا ہے دہ بھی خودا کیس کرکاری سکول کا ٹیچر ہے۔تو اس لیے آپ صاحبان سے درخواست ہے کہ جناب اس دومرے بند کو بیتوں پر بٹھا لیا ہے۔اورا سکے علاوہ جناب عالی جن بندے نے پیسے لے کرا گی جگہ ٹیسٹ اميدواروں نے دھاندلی کی ہے۔ جننے بھی اُميدواروں نے طبیب ميں حصہ کیا ہے زيادہ تر اپنے جگہ لیے ہیں۔ جو کد ڈٹل رقم 18 لاکھرد پے بنتے ہیں جو کہ غیر قانونی کام ہےاور غریبوں کے تق پرڈ حا کہ ہے۔ خویشکی بالامحکہ رحیم اللہ کورونہ۔ اس شیٹ کو پاس کرنے کے لیے ایک ایک بندے کی جگہ 16/6لاکھروپے ہے لوگوں سے پیچے کے کرددمرے غریبوں کا حق کینے کا کوشش کرتا ہے۔اس کے اس مرکاری ملازم کے حق مارا جار ہاہے۔ جناب میں جوآ کچو بیرورخواست دے رہا ہوں اس میں میر اکو کی ذاتی عنا دنیں ہے گئیں صرف ادرصرف ایک غریب کاحت مارا جار ہا ہے۔ جناب عالی ایک سرکا رکی ملازم جو کہ خودایک سکول ٹیچر فبحير بیٹھ کیا تھاا کے نام بیہ ہے جو کہ نیٹوں بھا کی ہے۔ضاءالرحمان، محمد عباس اور محمد عابد ولدا نعام علی سکنہ پاس ہے جو کہ بروفت ہم آ پنون کے سلتے ہیں۔

12 × 12



OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE HEADQUARTERS NOWSHERA Tel No. 0923-9220109 & Fax No. 0923-9220103

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To:

The District Police Officer, Nowshera.

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

FACT FINDING INQUIRY Subject:

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 26.11.2021to 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 condidates. He denied all the allegations leveled against him and disclosed that his brother namely

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.

FINDINGS

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.

02) 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.

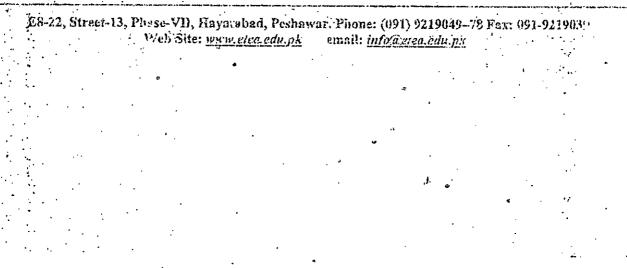
Encl: (83)

Deputy Superintendent of Police Headquarters Nowshera

2! GOVERNMENT OF KHYBER PAKHTUNKHWA Educational Testing & Evaluation Agency (ETEA) Peshawar 111 NO. ETEA 14-3/Mise/ Dated: (8/12/2021 T_0 The District Police Orficer (DPO) Nowshera COMPLAINT Subject: Dear Sir, I am directed to refer to your letter No. 1254 dated 30/11/2021 on the subject cited above and to enclose herewith the required document as desired please. Deputy Director (Adma) Copy to: The Director (Admi, & Finance), ETEA P.A to Executive Director ETEA

, Deputy Director (Admn)

Chalmian, Board of Governors: Chief Minister Khyber Pakhtunithwa





OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE HEADQUARTER, NOWSHERA

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The Director, Educational Testing & Evaluation Agency, (ETEA), Peshawar,

No. 1462

/S, Dated Nowshera the <u>14/-12</u>/2021.

Subject:

PROVISION OF EVIDENCE/RECORDING OF STATEMENTS IN FACT FINDING ENQUIRY AGAINST 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.

- 1. Recruitment/Exam SOPs.
- 2. Criteria for allotment of Roll Number to candidates.
- 3. Complete details of the following candidates:
 - i. Zia ur Rêhman 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

v. 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.

v/c

DEPUTY SUPERINTENDENT **OF POLICE HEADQUARTER, NOWSHERA**

Khyber Pakhtunkhwa Educational Testing & Evaluation Agency

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

Dated: 20-12-2021

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 he awith 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 o 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 Earth" field/column from oldest to newest while for written test roll numbers were allotted in sequence due to sorting data on "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 applicationform (Annex-III) is came; therefore, their roll numbers for physical test were automatically generated/allotted incorder 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.

super Lashtmikhu

Deputy Directo (1.7') ETEA

Cony to:-

Exc. / ive Director ETEA

Chairman, Equard of Governors: Chief Minister Khyber Pakh, ankhwa

27 28, Street-13, Phase-VII: Bayatabad, Peshawar. Phone: (091) 9219049-9219078 Fax: 091-9219439



OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE HEADQUARTER, NOWSHERA



To:

The Director, Educational Testing & Evaluation Agency, (ETEA), Peshawar.

Nõ. 14 / 2

_/S, Dated Nowshera the<u>_14/12_</u>/2021*.*

Subject:

Memo:

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

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.

- 1. Recruitment/Exam SOPs.
- 2. Criteria for allotment of Roll Number to candidates.
- 3. 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.

RINTENDENT **OF POLICE HEADQUARTER,**

NOWSHERA



Khyber Pakhtunkhwa Educational Testing & Evaluation Agency

Dated: 20-12-2021

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

-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 sorting the requisite data either on "Date of birth" field/column from either oldest to Newest or Newest to oldest 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, coll numbers for physical 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 on "picture" field/column, where pictures were having randomly generated names by the database and chline server. In the instant case, date of birth of the candidates, as per online application form (*Annev 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.

Shober Dakhtunkhwa Deputy Director (I.T)

ETEA

Copy to:-

Executive Director ETEA

Chairman, Board of Governors: Chief Minister Khyber Pakhtunkhwa

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

ROLL NO. 65367 NAME: SIFAT ULLAH ANSWER SHEET SERIAL NO. 436337 SIGNATURE. MAX MARKS: 20 TOTAL TIME: 30 MINUTES FORMATION OF SENTENCES (جلوں كودرست ترتيب دي) TRANSLATE INTO FORMAL URDU 1) آب بھی کیا کریں گے یاد بالازاکس ہے کہ تی ہے۔ 1) My father has been drawing pension since بیت دیکھ میر از خی کرممادل کو۔ 2) I have been working since morning. (15, 4,) (6 ci gr or 1) آپ کمن بن کاتا بردانوم وقت۔ 3) We do not know their names. ELO GAL (LE UIF. ۹) در ما تیر رن تنمی مجعلی میں۔ 4) Go with me outside. 12 Hu she 27 (5) بباركاموسم يرتاثير ب بوتابيت. 5) Lam ill. - (17, 16. 0 6) بچمیانے لگ میاس مدن^ع کر دہ آئھ یہ TRANSLATE INTO ENGLISH 6) روه آپ کے ساتھ کام کر ناچا ہتی ہے۔ 7) . جان پر کھیل کرلڑی فوج تھی حاری۔ She wants to work with your - cronce un (7 15) ، تمام سواول سے مازی لے میاسکول مارامیں کر کھی۔ Hay hore, with me. جو با قاعداگی ہے کی جاتی ہے سب ہے الحجی درزش ہے دہا۔ 9) برپیے اپنی جیب میں رکھیں۔ 10) - بوتا ايتم انجام ب عمل كاام عار ب بی میں بہت شرار 10) میں نے آب کے باب

RECRUITMENT OF POLICE CONSTABLES/ TRAFFIC WARDEN CONSTABLES KHYBER PAKHTUNKHWA, POLICE DEPARTMENT ROLL NO. 65369 NAME. ZIA UR. RAHMAI _____SIGNATURE. ANSWER SHEET SERIAL NO. 436329 MAX MARKS: 20 TOTAL TIME: 30 MINUTES (جلون كودرست ترتيب وس) FORMATION OF SENTENCES TRANSLATE INTO FORMAL URDU 1) My father has been drawing pension since 1) آب بھی کیا کریں۔ ج او پالا پڑا کس ہے کہ تی ہے۔ 2010. CECTIFIC STATIST المغرراني. elle of an in the 2,12/11 (2) بلیج دیکھ میراز خی کر میادل کو۔ 2) I have been working since morning. - Ush lin p Rom en co 3) آب کم ن ال کاتاب ده توم دفت د 3) We do not know their names. 4565.00-· in lo Gr R: join عيية بترجم الالتمام مست قنمه دریا تیرو بی تنفی مچھلی میں۔ 4) Go with me outside. (The section of the section le relierce ۲) برار کاموسم برتا تیر ب ہوتا بہت۔ 5) Lamill. مسم م<u>یت در مار مر</u>کز تا - (K/16.00 چھیانے لگ کیا سرمہ لگا کر دہ آ کھ۔ Will le lit as the line TRANSLATE INTO ENGLISH 6) رواج بح ساتح كام كرناج ابتى ب-جان پر کھیل کرلڑی نوج تتمی ہاری۔ (7 she wants to to work with 07 5 M 7) یہاں میرے ساتھ دہے۔ ج المام سواول ، بازی ال محیا عول جارامیں کر کٹ۔ (8 Stay here, with me. 8) تم ب تحك بوغ ين 1 () جو با قاعد گی این کی جاتی ہے سب ہے اچھی درزش ہے دہ۔ are all fired. Jule 2. C. Usian Strange Keep this money in your pocket to it to it ۵۰) ہوتا بیتھ انجام ہے ^{عم}ل کا تچا۔ . Ceti 1 (001 (131 10 de 1 I have heard alot about you.

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

ROLL NO. 65366 NAME Muhamman ANSWER SHEET SERIAL NO. 1136 336 SIGNATURE. MAX MARKS: 20 TOTAL TIME: 30 MINUTES TRANSLATE INTO FORMAL URDU (جلوں كودرست ترتيب وس) FORMATION OF SENTENCES 1) My father has been drawing pension since سى سے بالاب ا 1) آب بجمی کیا کریں کے یاد پالابڈا کس ہے کہ تخ سے 2010. With the is in the 4. 11501 yea (5" 11:2019 11, 7) بلي ديد بيزاز خي كرميادل نو_ 2) I have been working since morning. www.2ids Ina pis it the -034 42 pr (10 pr 4.8 02 ی آب کے کن بڑیا کاتا ہے وہ او پر دقت۔ 3) We'do not know their names. - HEling VELY Singe The on Contille 4) در ما تیر رہی تھی مجھلی میں یہ 4) Go with me outside. · 18 (C ممتميح برم 10 Hb SIN CF. () بہارکاموسم پُر تاثیر ہے ہوتا کہنے 5) 1 am ill. and see the first U.T. J.C. الم من المراجع من المراجع من المراجع من المراجع المراجع المراجع المراجع المراجع المراجع المراجع المراجع المراجع من المراجع المر من المراجع المر TRANSLATE INTO ENGLISH 6) مرده آب کے ساتھ کام کرنا جا ان ہے۔ جان پر عمل کرازی وج جی ماری . بیکمرور در این اور جرح مربط . بی اور تعطیل و you wants to work whit SLP 7) یہاں بمیرے ساتھ دے تمام سحاول من باذكاب مياسكول بادامين كركت-(8)بجيارا متهول فيرنك عين عناكات hose me ہم سب تھکے ہوئے ال۔ (8 جو با قاعد کی ہے کی جاتی ہے سب ہے المچمی درزش ہے وہ۔ () orll fised جرار ور مرد مرد من منه وی من را منا عدری سر در من الله الله من من من الله الله من Pockel. (10) بوتات الجام بح على كالجلد التي موا الحل التي التي عبد المرابع الما من المرابع الدين به ساب Hic ct D free de la company cars d/ atot about Sill

RECRUITMENT OF POLICE CONSTABLES/ TRAFFIC WARDEN CONSTABLES KHYBER PAKHTUNKHWA, POLICE DEPARTMENT n & bia 1 55 _____NAME. ROLL NO. 65368 ANSWER SHEET SERIAL NO. 436338 **SIGNATURE** MAX MARKS: 20 TOTAL TIME: 30 MINUTES FORMATION OF SENTENCES ((جملوں کو درست ترتیہ TRANSLATE INTO FORMAL URDU My father has been drawing pension since 1) " سبب محل كيا ترين في ماديالا براكس ب كه تى س 18/11 2010. ing alow it - منفر وحمول مردط بع 20/0 ella colo en i٩ 2) بلیج میراز خی کر میادل کو _ 2) I have been working since morning. (in up up lin an on up up د) آپ کے مکن بن کاتا بنے دہ تو ہر وقت 3) We do not know their names. Contain in lo Cont lo conte 13 8 <u>6 8 9</u> 4؛ 👘 درمانیر رہی تکی مجھلی میں ۔ 4) Go with me outside. محملكا وريا مس مريك بحل 10/10 31 ۲۰) : بارکاموسم برتا ثیر ب موتا به. 5) I am ill. run for go saily (your 10 - تيمياف لك ميام مداكا كرده أبك UI PRESIEN TRANSLATE INTO ENGLISH 6) دە تىم كرما تەكام كرماچاتى ب-سان شەر سەر سالى -چان پر کھیل کرلڑی نوج تھی ہماری۔ to the works 107. 2. CMC يبان مير ب ما تھ رہے. (7 () تمام سوادوں سے بادی لے میاسول جادا میں کرکٹ horp 140 (8] ب تھے ہوئے ہیں۔ V. July so د با قاعد گی سے کی جاتی ہے سب سے المجمی درزش ہے دو۔ م سب کن کی جاتی ہے سب سے الحراض حی سیے 1e ale. اللون ورز سر، وی موری <u>کر باغ</u>رو 9) میکھیلری جب میں رکھیں۔ · Per les 2 this maney in Your -(i) ، جوتا ایتھ انجام ہے قمل کا احجابہ Fur pilisipule 21 ala 1 have



KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY (ETEA)

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Online Application Form of Police Constable (BPS-07) NAME: SIFAT ULLAH FATHER/HUSBAND'S NAME: FARZAND ALI APPLICANT COIC NO: 1720161849145 DATE OF BIRTH: 1 1-JANUARY-1998 **RELIGION:** MUSLIM **POLICE SON:** NO **GENDER:** MALE DOMICILE: **NOWSHERA** KHESHGI BALA, PO KHESHGI PAYAN, TEH AND DIST **POSTAL ADDRESS:** NOWSHERA

PERMANENT ADDRESS:

Educational Information:

Highest Qualification:

HSSC/ Intermediate/ A – level

NOWSHERA

KHESHGI BALA, PO KHESHGI PAYAN, TEH AND DIST 🗸

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NAME:	ZIA UR RAHMAN	
FATHER/HUSBAND'S NAMI	INAM ALI	
APPLICANT CNIC NO:	1720159918463	
DATE OF BIRTH:	1-¦ANUARY-1998	
RELIGION:	MUSLIM	
POLICE SON:	NO	
GENDER:	MALE	·
DOMICILE:	NOWSHERA	
POSTAL ADDRESS:	RAHEEM ULLAH KOROONA, KHESHGI BALA, KHESHGI PAYAN, TEH AND DIST NOWSHERA	
PERMANENT ADDRESS:	RAHEEM ULLAH KOROONA, KHESHGI BALA, KHESHGI PAYAN, TEH AND DIST NOWSHERA	

Educational Information:

, Highest Qualification:

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A EDUCATIONAL TESTING & EVALUATION AGENCY (ETEA) **KHYBER PAKHT**

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NAME:	MUHAMMAD ABBAS	A	
FATHER/HUSBAND'S NAI	ME: INAM ALI	· •	
APPLICANT CNIC NO:	1720105492443	•	
DATE OF BIRTH:	1 JANUARY-1998	1	·
RELIGION:	MUSLIM		
POLICE SON:	NO		· .
GENDER:	MALE		
DOMICILE:	NOWSHERA	-	
POSTAL ADDRESS:	RAHEEM ULLAH KOROONA KHESHGI PAYAN TEH AND		Α.

PERMANENT ADDRESS:

RAHEEM ULLAH KOROONA, KHESHGI BALA PO KHESHGI PAYAN TEH AND DIST NOWSHERA

Educational Information:

Highest Qualification:

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KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY (ETEA)

Online Application Form of Police Constable (BPS-07)

NAME:	MUHAMMAD ABID		
FATHER/HUSBAND'S NAM	E: INAM ALI	. •	
APPLICANT CNIC NO:	1720103598981	· •	
DATE OF BIRTH:	1-JANUARY-1998	•	
RELIGION:	MUSLIM	·	
POLICE SON:	NO		
GENDER:	MALE		. L
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POSTAL ADDRESS:	RAHEEM ULLAH KOROON KHESHGI PAYAN, TEH ANI	A, KHESHGI BALA, PO D DIST NOWSHERA	
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Educational Information:

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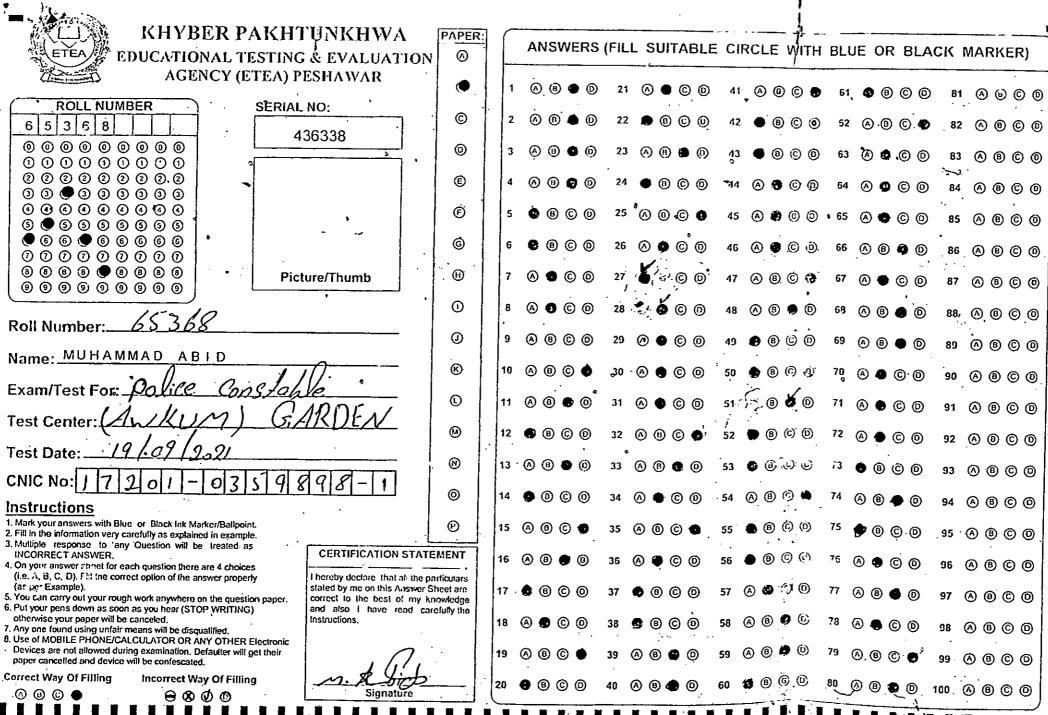
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KHYBER PAKHTUNKHWA PAPER: ANSWERS (FILL SUITABLE CIRCLE WITH BLUE OR BLACK MARKER) EDUCATIONAL TESTING & EVALUATION igodol AGENCY (ETEA) PESHAWAR 81 A B C D ഀ A B C C 61 . 6 0 0 SERIAL NO: ROLL NUMBER 82 A B C O C ® © 0 ത 2 62 6 5 3 6 6 436336 83 (A) (B) (C) (D) 0 O 0 23 (B) 63 Ø ® 3 43 A 0 0 0 0 0 0 0 0 0 0 $A \otimes O \otimes$ 84 (Ē) (A) (8) $^{\circ}$ \otimes (C) 0000000000 3 3 0 3 3 3 3 9 3 A B C D ® © 0 ര © 0 Ð 5 00000000000 6 6 6 6 6 6 6 6 6 $(A \cdot B) (C) (D)$ 0 O 0 86 6 (B) (C) 6 6 6 6 6 6 6 6 87 A B C O ⊕ C \odot 88888888 Picture/Thumb • • • • • • • • • • • • 88 . A B C O \odot 0 O 0 C 681 (A) ⊛ Ô 66 Roll Number: 65 A 8 C 0 89 $(\mathbf{0})$ ര Name: MUHAMMAD ABBAS A B C O 90 ® © \bigcirc \bigcirc \odot 10 SO. - (A) Constable Exam/Test For: _ Police_ 91 A B C O 0 71 (0)രര 11 rest Center: Aukwml mardan, Shanikh mit A B C D 6 Ô ര 72 A © 0 92 © 0 (A)12 Fest Date: 19 - 09-73 (A) © (0) 93 A B C D \odot രര 13 A 8 **CNIC No:** 91 94 A B C D n 74 A © 0 0 Ô 14 A B C nstructions 95 A B C O 75) A Ð 15 , Mark your answers with Blue or Black ink Marker/Ballpoint. 1. Fill in the information very carefully as explained in example. I. Multiple response to any Question will be treated as **CERTIFICATION STATEMENT** 000 B A (A)ര 76 \otimes **(B)** 0 96 **(B)** Ô 0 \bigcirc 56 16 INCORRECT ANSWER. I. On your answer sheet for each question there are 4 choices I hereby declare that all the particulars (i.e. A, B, C, D). Fill the correct option of the answer property 97 A B C O \bigcirc stated by me on this Answer Sheet are 17 (A) (B) (as per Example). correct to the best of my knowledge 5. You can carry out your rough work anywhere on the question paper. and also I have read carefully the 5. Put your pens down as soon as you hear (STOP WRITING) 98 A B C O 🖲 🖲 🔘 🕒 78 \odot 0 O (B) (C) (D) 58 18 **A B** ര Instructions. 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, 99 A B C D 00079 (C) 0 (B) (C) (D) $^{\circ}$ 59 19 Devices are not allowed during examination. Defaulter will get their paper cancelled and device will be confescated. 100 A B C D 8 © 0 (A) 🗶 (C) 🔘 80 • 0 (C) (B) 🔴 Μ® 60 40 Incorrect Way Of Filling 20 **Correct Way Of Filling** $A \oplus C$ 00

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FINAL SHOW CAUSE NOTICE

Whereas, you <u>Recruit Constable Muhammad Abid No. 1160</u>, 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 Muhammad Abid No. 1160, s/o of Inam Ali got your test passed through the aforementioned Sifat Ullah and Sifat Ullah received Rs;600000/ from you.

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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 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 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 failed 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 you have conversation 03 times with the said teacher.

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

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