

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No: 1915/2023

Nadir Khan S/O Lal Gul R/O Shakir Dandow, Takht Bhai, Mardan

(Appellant)

Versus

District Education officer (Male) Mardan & Others


(Respondents)
Khyber Pakhtunkhwa
Service Tribunal

INDEX

Disty No. 4782
Dated 7/4/2023

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Respondent


District Education Officer
(Male) Mardan

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA
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(Appellant)

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(Respondents)

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-4.

Respectfully Sheweth,

PRELIMINARY OBJECTIONS :

- 1 **That** the Appellant has got no cause of action/locus standai to file the instant appeal before this Honorable Tribunal.
- 2 **That** the appellant has concealed material facts from this Honorable Tribunal in the titled appeal.
- 3 **That** the Appellant has not come to this Honorable Tribunal with clean hands.
- 4 **That** the case is bad for miss-joinder and non-joinder of the necessary parties.
- 5 **That** the respondent department has been advertised since long, various posts along with PST posts on contract basis which is mentioned in Para 02 of the advertisement. **(Copy of Advertisement is as Annexure -A)**
- 6 **That** the appeal is time barred by law of limitation Act. Reliance on reported judgments, 2006 SCMR -535 & SCMR- 453 of the apex Court of Law, "Service Tribunal should have taken note of the fact that appeal before departmental authority being Time bared, Service Appeal before the Service Tribunal is also incompetent. Reliance on reported judgments, 2007 SCMR -621 the apex Court of Law, " It is the duty of every court to see point of limitation." Reliance on reported judgments, 2013 CLC -403 & 1553 the apex Court of Law, "where a party had slept upon its rights & acquiesced for a great length. of time. Delay of each day would have to be explained.
- 7 **That** after appointment complaint received against the appellant and other candidates and the respondent has conducted Inquiry, and the impersonation was proved on the part of appellant. the appointment order of the appellant has withdrawn vide order No 6187/G dated 20/08/2016.

(Copy of Inquiry & withdrawn Order are as annexure -B & C)

- 8 That the respondent has sent a letter to the concerned District Police Officer (DPO) for registration of FIR ,Endst No 6602 & 6603/G dated 31/08/2016. (Copy of Letter is as Annexure D)
- 9 That the Withdrawn order No 6187/G dated 20/08/2016 of the Respondent No.1 with legal sphere & liable to be maintained (Copy of Order is as Annexure C)


ON FACT:

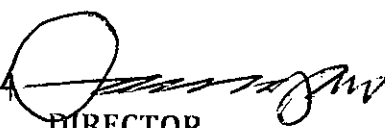
- 1. Para No 1 pertains to record, hence need no comments.
- 2. Para No 2 pertains to record, however after appointment complaint received against the appellant and other candidates and the respondent has conducted Inquiry, and the impersonation was proved on the part of appellant. The appointment order of the appellant has withdrawn vide order No 6187/G dated 20/08/2016, hence need no comments.
(Copy of Inquiry & withdrawn Order are as annexure -B & C)
- 3. Para No 3. Incorrect & not admitted as the appellant is not qualifying the NTS Test, and as per inquiry report and NTS picture, the appellant is not physically verified. Another person, namely Mr. Jawad s/o Ayaz R/o village Kaloo Takkar Mardan, is sitting against the appellant i-e Mr. Nadir khan, which shows that he was clear impersonator for Mr. Nadir khan.
(Copy of Inquiry is as annexure -B)
- 4. Para No 4. Incorrect & not admitted as the Withdrawn order No 6187/G dated 20/08/2016 of the Respondent No.1 with legal sphere & liable to be maintained, because the departmental appeal has filed 09/08/2022, which is too late and badly Time barred, hence denied.
- 5. Para No 5. Incorrect & not admitted, that the plea of the appellant is illegal as the order dated 20-08-2016 is legally competent , hence denied.
- 6. Para No 6. Incorrect & not admitted, that the impersonation was proved on the part of appellant, and the appointment order of the appellant has withdrawn vide order No 6187/G dated 20/08/2016, hence denied.
- 7. Para No 7. Incorrect & not admitted, that Mr. owais khan has filed writ petition No 3702-P /2016 before Peshawar high Court Peshawar within time and service appeal of the appellant is time barred, hence denied.
- 8. Para No 7. Incorrect & not admitted, that the Limitation is start from the withdrawn order No 6187/G dated 20/08/2016 and the Limitation is not start from the order of Mr. Owais Khan vide order No 3758/G dated 23/04/2022. The appellant is aggrieved from the withdrawn order dated 20/08/2016, and the departmental appeal is filed dated 01/ 12/2022 which is badly time barred, hence denied.
- 9. Incorrect & not admitted. As replied above.
- 10. Incorrect & not admitted. As replied above.

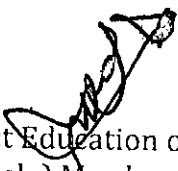
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11. Incorrect & not admitted. Hence, needs no further comments.
12. Incorrect & not admitted. The plea of the appellant is illegal. Therefore, the Respondent also seeks leave to this Honorable Tribunal to submit additional grounds record & case law at the time of arguments.

Therefore, in view of the above made submissions, it is most humbly prayed that on the acceptance of this reply, the appeal in hand may kindly be dismissed in favor of the Respondent Department in the interest of justice.


SECRETARY
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 3)


DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 2)


District Education officer
(Male) Mardan
(Respondent No: 1)

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**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No: 1915/2023

Nadir Khan S/O Lal Gul R/O Shakir Dandow, Takht Bhai, Mardan

(Appellant)

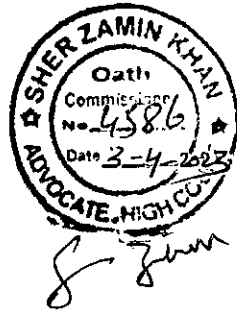
Versus

District Education officer (Male) Mardan & Others

(Respondents)

AFFIDAVIT

I, Mr. Sajid Khan Legal Representative Education Department Mardan do hereby solemnly affirm and declare that the contents of Joint Para Wise Comments submitted by Respondents No 1 to 3 are true to the best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal



Deponent

Sajid Khan
Sajid Khan

16101-6005318-5



(5)


OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

No. 2054

DATED 5/4/2023

AUTHORITY LETTER

I, District Education Officer (Female) Mardan do hereby authorize Mr. Sajid Khan Legal representatives of the District Education Officer (Female) Mardan to Deal with the issues regarding Litigation, Represent & to attend the Hon, ble Service Tribunal Regarding Litigation.


District Education Officer
(Female) Mardan

05/4/23

درخواستیں مطلوب ہیں

محکمہ پبلک سروس ایڈمنسٹریشن کے زیر انتظام مردانہ سکولوں میں مندرجہ ذیل کیڈرز کی خالی آسامیوں پر ایڈہاک سکول (Adhoc School Based) تقریروں کے لئے مندرجہ ذیل اسکولوں میں ایڈہاک اسٹاٹس پر موجودہ فارم نمبر 28 اگست 2015 تک درخواستیں مطلوب ہیں۔ درخواست فارم نمبر این ٹی ایس (NTS) کی ویب سائٹ (<http://www.nts.org.pk>) پر دستیاب ہے۔ یا درج ذیل کے مکمل اور متروک تاریخ گزرنے کے بعد موصول ہونے والی درخواستوں پر غور نہیں کیا جائیگا۔

نمبر شمار	نام آسامی	تالیف	عمر کا حد
1	سی بی ایس ایس	بی ایس ایس کی آسامی تالیف کی گئی ہے۔ تالیف شدہ پندرہویں سے پندرہویں کی سرٹیفکیٹ یا دو سالہ ایس ایس ایٹ ڈگری ان ایجوکیشن کی گئی ہے۔ تالیف شدہ پندرہویں سے 18 (اٹھارہ) ماہ کا ڈیپلوما ان ایجوکیشن	18 تا 35 سال
2	بی ایس ایس	بی ایس ایس کی آسامی تالیف کی گئی ہے۔ تالیف شدہ پندرہویں سے پندرہویں کی سرٹیفکیٹ یا دو سالہ ایس ایس ایٹ ڈگری ان ایجوکیشن کی گئی ہے۔ تالیف شدہ پندرہویں سے 18 (اٹھارہ) ماہ کا ڈیپلوما ان ایجوکیشن	18 تا 35 سال
3	ڈی ایم (BPS-15)	بی ایس ایس کی آسامی تالیف کی گئی ہے۔ تالیف شدہ پندرہویں سے پندرہویں کی سرٹیفکیٹ یا دو سالہ ایس ایس ایٹ ڈگری ان ایجوکیشن کی گئی ہے۔ تالیف شدہ پندرہویں سے 18 (اٹھارہ) ماہ کا ڈیپلوما ان ایجوکیشن	18 تا 35 سال
4	ٹاری (BPS-12)	انٹرمیڈیٹ، مودلڈ انٹرمیڈیٹ اور سندھ فرم کی گئی ہے۔ تالیف شدہ پندرہویں سے پندرہویں کی سرٹیفکیٹ یا دو سالہ ایس ایس ایٹ ڈگری ان ایجوکیشن کی گئی ہے۔ تالیف شدہ پندرہویں سے 18 (اٹھارہ) ماہ کا ڈیپلوما ان ایجوکیشن	ایسا
5	بی ایس ایس (BPS-12)	انٹرمیڈیٹ یا آسامی سرٹیفکیٹ کی گئی ہے۔ تالیف شدہ پندرہویں سے پندرہویں کی سرٹیفکیٹ یا دو سالہ ایس ایس ایٹ ڈگری ان ایجوکیشن کی گئی ہے۔ تالیف شدہ پندرہویں سے 18 (اٹھارہ) ماہ کا ڈیپلوما ان ایجوکیشن	ایسا

سلیکشن کوریٹیوریا (Selection Criteria): اساتذہ کی سلیکشن کیلئے کریمینا تاریخ ذیل میں ہیں 200 نبرات کی تقسیم اس طرح کی جائے گی۔
(1) سکریننگ ٹیسٹ بذریعہ NTS=100 نمبر (ب) تالیف تالیف=100 نمبر جس کی مزید تقسیم اس طرح ہوگی۔

تالیف تالیف	کل نمبر	تالیف تالیف	کل نمبر
ایس ایس ایس	مائل کردہ نمبر 20 x تقسیم کل نمبر	ایس ایس ایس	مائل کردہ نمبر 20 x تقسیم کل نمبر
بی ایس ایس	مائل کردہ نمبر 20 x تقسیم کل نمبر	ایس ایس ایس	مائل کردہ نمبر 20 x تقسیم کل نمبر
ہر آسامی کیلئے کم از کم مطلوبہ پیشہ ورانہ تالیف	مائل کردہ نمبر 15 x تقسیم کل نمبر	ایس ایس ایس	مائل کردہ نمبر 15 x تقسیم کل نمبر
ایم ایس ایس	مائل کردہ نمبر 5 x تقسیم کل نمبر	ایس ایس ایس	مائل کردہ نمبر 5 x تقسیم کل نمبر

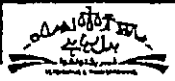
نوٹ 1: ہر سکول کی آسامی کیلئے علیحدہ علیحدہ میرٹ لسٹ ترتیب کی جائیگی۔ جس میں امیدواروں کے NTS کے مائل کردہ نمبر اور تالیف تالیف کے نمبروں کو جمع کیا جائے گا۔ (2) ہر امیدوار سے NTS کی درخواست فارم نمبر 300 روپے چارج کیا جائے گا۔ ایک امیدوار پانچ سکولوں کے لئے درخواست دے گا تو اس سے صرف 800 روپے ہی NTS چارج کرے گا۔ جو کہ امیدوار خود برداشت کریں گے۔

عمومی شرائط: (1) تمام امیدواروں کے ڈیپلوما اور شائستگی کا ڈیپلوما مستحق سکول مندرجہ ذیل کے امیدواروں کا ہونا چاہیے اور درخواست پر غور نہیں کیا جائے گا۔ جبکہ بی ایس ایس ٹی میں شون کیلئے جن سکول میں آسامی خالی ہے امیدوار کا ایس ایس ایٹ یا ایس ایس ایٹ کے ساتھ ہونا ضروری ہے۔ اگر ایس ایس ایٹ میں امیدوار موجود ہوں تو اس آسامی کیلئے ملحقہ پوزیشن کوئل کے امیدواروں کو زیر غور لایا جائے گا۔ (2) تمام تقریریں خالصتاً عارضی بنیادوں پر Adhoc کنٹریکٹ پر ایک سال کیلئے ہوں گی۔ (3) انٹرویو کے وقت ایسی ایس ایٹ اساتذہ شائستگی کا ڈیپلوما لازمی ہے اور ٹیسٹ کے دن صرف اصل شائستگی کا ڈیپلوما لازمی ہے۔ (4) میرٹ پر آنے والے امیدواروں کی اساتذہ متعلقہ ادارے سے تصدیق کرائی جائے گی جس کے تمام اخراجات امیدوار کو برداشت کرنا ہوں گے۔ (5) انٹرویو کیلئے آنے والے امیدواروں کو کوئی ایس ایس ایٹ نہیں دیا جائے گا۔ (6) صرف مقررہ وقت کے اندر موصول ہونے والی درخواستوں پر غور کیا جائیگا۔ (7) زیر غور کو اختیار حاصل ہے کہ وہ کوئی ایس ایٹ دے گا یا نہ دے گا۔ اگر ایس ایٹ دے گا تو اسے اپنا ہونا ضروری ہے۔ (8) اگر اس اشتہار کے بعد حکومت وقت کی طرف سے برقی کے طریقہ کار میں تبدیلی کی گئی تو سلیکشن کمیٹی اس کے مطابق عمل کرنے کی پابند ہوگی۔ (9) محکمہ پبلک سروس ایڈمنسٹریشن کو اختیار حاصل ہوگا کہ وہ تمام خالی آسامیوں یا اس سے کم پر امیدوار مقرر کرے۔ (10) تمام تقریریں حکومت خیرہ بہمنو خیرہ کے متروکہ تو ان میں انٹرویو منسوخ کرے۔ (8) اگر اس اشتہار کے بعد حکومت وقت کی اساتذہ صرف گورنمنٹ کے تالیف شدہ اداروں کی قابل قبول ہوں گی۔ (12) اگر کسی امیدوار کی اساتذہ تعلیم پائی گئی تو اس کے خلاف قانونی چارہ جوئی کی جائے گی اور آئندہ کے لئے اسے سرکاری ملازمت کے لئے داخل تصور کیا جائے گا۔ (13) نامکمل فارم یا معلومات کی صورت میں درخواست فارم خود بخود منسوخ تصور کیا جائے گا جس کے لئے کوئی اپیل منظور نہیں کی جائے گی۔ (14) انٹرویو کیلئے ایک شیڈول جاری کیا جائے گا۔ (15) امیدوار کو اس سکول میں مقرر کیا ہوگا کہ وہ اس کے مطابق داخل ہوگا۔ (16) ایک امیدوار ایک وقت 5 سکولوں میں خالی آسامیوں کیلئے درخواست دے سکتا ہے۔ (17) درخواست دینے کا طریقہ کار NTS کی ویب سائٹ پر موجود ہے۔ (18) متعلقہ خالی آسامیوں کی تفصیل سکول دائرہ درخواست فارم کے ساتھ NTS کی ویب سائٹ پر دی گئی ہے اور ہر سکول کو اپنا گلا دیا گیا ہے۔ (19) سندھ افراد کے لئے دو لیکچرر جنٹس کیا گیا ہے۔ سندھ افراد کے لئے پوزیشن افراد کا شائستگی کارڈ حکومت سے منظور شدہ سینڈنگ میڈیکل بورڈ کا سرٹیفکیٹ لازمی پیش کرنا ہوگا۔ (20) Minority افراد کیلئے 3 فیصد کوٹیشن کیا گیا ہے۔ (21) سکل ڈیپلوما کوئل کی اساتذہ قابل قبول نہیں ہوگی۔ (21) امیدواروں سے درخواست کی جاتی ہے کہ معلومات کے لئے www.nts.org.pk وزٹ کرتے رہیں۔

Say No to Corruption

ڈیپلوما ایجوکیشن آفیسر (مردانہ)، ایڈمنسٹریشن

سینکڑری ایجوکیشن منسٹر مردانہ۔ فون نمبر: 0937-92302151



Annexure B (7)

Office of the Principal

GHS Babuzai Katlang Mardan

Dated 03/08/2016 NO 289

District Education Officer Male

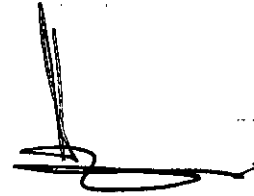
Elementary And Secondary Education

Mardan

Subject; THE IMPERSONATION CSE OF MR OWAIS KAHN S/O MR REHMAT KHAN ROLL NO 45221154, MR MUHAMMAD WAQAR S/O Mr SULTAN MUHAMMAD ROLL NO 602300656, MR NADAR KHAN S/O MR LAL GUL ROLL NO 452301048. MR MUHAMMAD TARIQ S/O MUHAMMAD YOUSAF ROLL 451700924, MR FAZLULLAH S/O SAWAB JAN ROLL NO 452501222 IN THE NTS TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT MARDAN HELD IN NOVEMBER 2015.

Respected Sir

Find the attached enquiry please.



PRINCIPAL

GHS BABUZAI KATLANG

MARDAN

ENQUIRY REPORT AGAINST

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THE IMPERSONATION CASE OF MR OWAIS KAHN S/O MR REHMAT KHAN ROLL NO 45221154, MR MUHAMMAD WAQAR S/O MR SULTAN MUHAMMAD ROLL NO 602300656, MR NADAR KHAN S/O MR LAL GUL ROLL NO 452301048. MR MUHAMMAD TARIQ S/O MUHAMMAD YOUSAF ROLL 451700924, MR FAZLULLAH S/O SAWAB JAN ROLL NO 452501222 IN THE NTS TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT

MARDAN HELD IN NOVEMBER 2015.

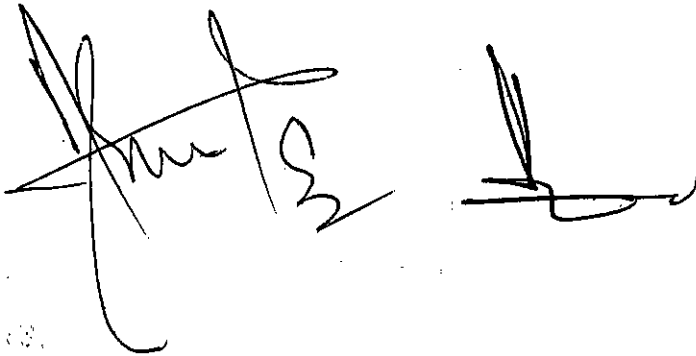
Assigned by District Education Officer Male Elementary and Secondary Mardan

Date Of Submission

04/08/2016

Enquiry Officers

1. Mr Arshad Hussain Principal GHS Babuzai Katlang Mardan
(Chairman)
2. Mr Abdul Khaliq ASDEO Sherghar circle.
(Membe



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ENQUIRY REPORT AGAINST THE IMPERSONATION CASE OF MR OWAIS KAHN S/OMR REHMAT KHAN ROLL NO 45221154, MR MUHAMMAD WAQAR S/O Mr SULTAN MUHAMMAD ROLL NO 602300656, MR NADAR KHAN S/O MR LAL GUL ROLL NO 452301048. MR MUHAMMAD TARIQ S/O MUHAMMAD YOUSAF ROLL 451700924, MR FAZLULLAH S/O SAWAB JAN ROLL NO 452501222 UC MADI BABA IN THE NTS TEST FOR PST POST IN ELEMENTARY AND SECONDARY EDUCATION DISTRICT MARDAN HELD IN NOVEMBER 2015.

No-----289

Date-----03/08/2016

Committee Members

1; Mr Arshad Hussain (Chairman)

Principal GHS Babuzai Katlang Mardan

2; Mr Abdul Khaliq (Member)

ASDEO Sher Ghar Jalala Mardan

Dates Of Enquiry

21/06/2016

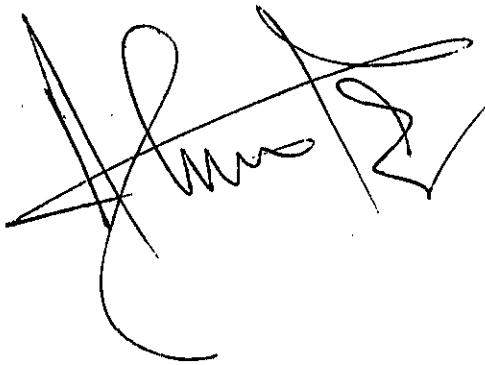
01/07/2016

06/07/2016

10/07/2016

21/07/2016

28/07/2016



Venue of Enquiry

- 1; GHS Janga Mardan
- 2; DEO Male office Mardan
- 3; Village Madi Baba Mardan
- 4; DEO Male office Mardan
- 5; Village Kaloo Shah Takht Bhai

Subject

Enquiry against the above candidates in connection with the Impersonation case in the NTS Test for the post of PST in Elementary and Secondary Education Mardan KPK.

Introduction

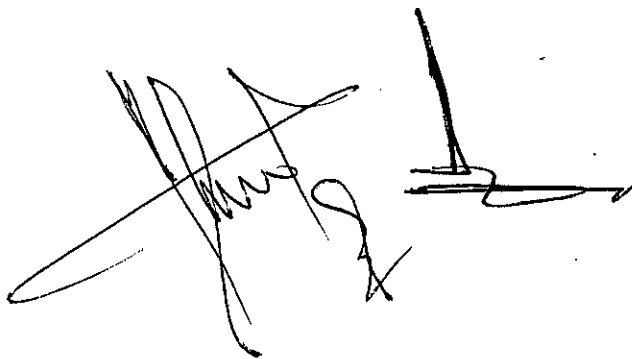
According to the DEO Male Mardan Notification No 4488 Dated 04/06/2016 a committee was constituted to find out the ground realities about the impersonation case in the examination of NTS against the above candidates belong to Union council Madi Baba Tehsil Takht Bhai Mardan.

Brief History

An application against the above candidates was filed by Mr Fazlullah and other in the office of DEO Male E/S Mardan complained that

The following candidates

1. Mr.Owais Khan S/O Mr Rahmat Said Union Council Madi Baba
2. Muhammad Waqar S/O Mr Sultan Muhammad Union council Madi Baba
3. Nadar Khan S/O Lal Gul Union council Madi Baba
4. Muhammad Tariq S/O Muhammad Yousaf



Had applied for PST through NTS in the month of November 2015 but in the tests of NTS they have not appeared by themselves and some other people have taken the test as Impersonators for them.

The DEO Male E/S Mardan constituted an enquiry committee comprising Mr Arshad Hussain Principal GHS Babuzai Katlang Mardan and MR Abdul Khaliq ADEO Sherghar Circle and also included Mr Fazlullah in the list of under investigation candidates to be enquired.

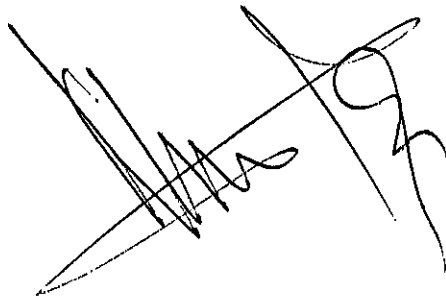
Procedures adopted

The committee met in the DEO office and decided to summon the above candidates to GHS Janga Mardan for an interview and investigation. All the above candidates were issued letters and also informed through mobile phones to attend the above school along with their original documents, attested photographs and original CNIC on 21/06/2016.

Findings

All the above candidates attended GHS Janga personally at 09 am on 21/06/2016. They were given questionnaires to be answered and checked all their documents, CNIC and photos and also judged their specimen signatures and the signatures provided by the NTS and signature in the NTS form. According to our knowledge and investigation we found the following facts about the candidate discussed as under.

1. Mr Owais Khan S/O Mr Rahmat Said Roll No 452201154 CNIC No 16102-3242527-5 U/C Madi Baba had applied for the post of PST through NTS and had taken the test in the month of November 2015 and has been appointed as PST at GPS Yakh kochi Takht Bhai . When we showed the photo graph provided by the NTS drawn during the test, Mr Owais Khan declared it as his own photo and told that he had taken the test himself. But according to our personal and methodical investigation it is the picture of another person named Mr Zeeshan S/O Mr Wali Rahman village and P/O Thordher Takht Bhai CNIC No 16102-0867357-1 who has taken the test for Mr Owais Khan as an impersonator. We got his mobile number and called him to join us in the DEO office on 28/07/2016 in the case of impersonation to clear his position. He promised to come. A person resembling Mr Zeeshan came to DEO office and showed himself as Zeeshan .We asked for CNIC but he had no original CNIC though had have a photo copy and gave us. In the mean time DEO MR Siraj Muhammad came to the office where we wanted to discuss the



case the person ran away. It reveals that he was not Mr Zesshan but was the impersonator of the real impersonator. We also compared the specimen signatures of Mr Awais Khan obtained during the interview with the signature put in the NTS form and attendance sheet of the NTS test between which we found hundred and one percent difference. Similarly through other reliable sources from his community we came to know that that was totally impersonation. The impersonator is Mr Zeeshan S/O Wali Rahman village tordher Takht Bhai. When again Mr Zeeshan was called again to attend the interview for Clarence he answered that there was no execution in impersonation which shows his wicked attitude against the state.

2. Mr Muhammad Waqar S/O Sultan Muhammad U/C Madi Baba Roll No 602300656 CNIC No 16102-7525605-5 is supposed to have taken the test in the month of November 2015 at CMS College system phase 5 Hayat Abad Peshawar center and has appointed against PST post at GPS Fazal Bad Shah KILLI Takar Takht Bhai. According to his verbal statement his admission form for NTS had been filled by his cousin Mr Baroz S/O Mr Sadiq doing C.A at Lahore Punjab. But unfortunately his video/photograph has not been provided by the NTS to DEO office though we have requested NTS Organization for so many times to provide us his picture taken during the test. According to our vision there two reasons for missing of his picture in the NTS. Either he will have escaped from the examination hall before drawing the video or NTS Organization willfully is not providing us his video/picture. However his specimen signatures obtained during the interview is obviously different from the attendance signature obtained from the NTS organization and also from the signature given in the NTS form for test.

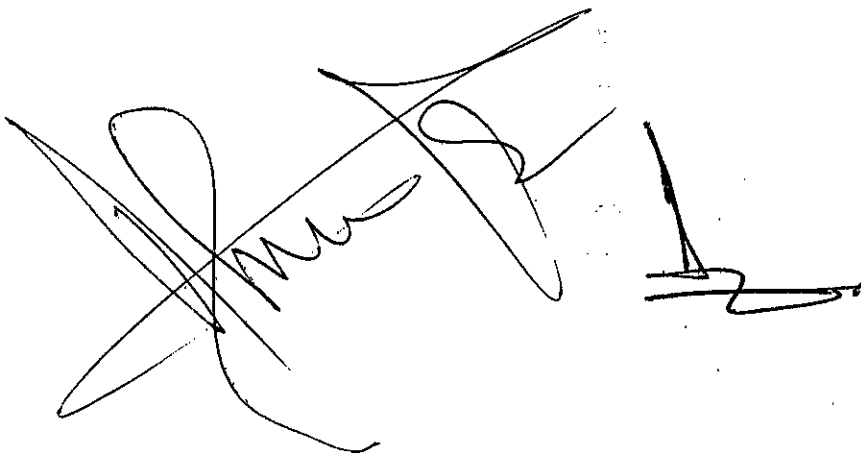
3. When Mr Nadar Khan S/O Lal Gul was was called through mobile phone on the number given in his NTS form. It was attended by another person named Saleh Muhammad S/O Sardar Ali Clerk in GGDC Takht Bhai but expressed his name as Ali Zaman S/O Khan Zeb which was a clear lie. But later on he was Mr Saleh Muhammad S/O Sardar Muhammad village Takkar j/c GGDC Takht Bhai. With the help of community members Mr Saleh Muhammad is the cousin and brother in law of the impersonator Mr Jawad S/O Ayaz and he also confessed. However through some other people Nadar Khan was summoned and in the light of his form and statement he had appeared for the same test in the same center at Ansi Degree College Mardan and has been appointed against PST post at GPS Dandaw Takht Bhai. When he was asked about the picture drawn during the NTS test provided by NTS he confessed that the picture was not his own but did not know about the impersonator But with the help of community members we came to know that he was Mr Jawad S/O Ayaz MA/ M Sc Village Kaloo Shah Takkar . We got his mobile number and called him to attend our office at Kalang , he promised to attend but later on he excused to come there. However we got his fresh video and testified by the community members and compared with the picture provided by the NTS, both the video and the picture provided by the NTS are of the same person Mr Jawad. which shows that he was the clear impersonator for Mr Nadar Khan. Besides, The specimen

signatures of Mr Nadar Khan are also different from the signature put in the NTS form for admission. From different channels he has requested us to declare his case transparent. In the light of above facts we are clear that it is 101 percent impersonation. We also met with Mr Saleh Muhammad J/C who had not logical and reasonable reason for his mobile phone number given in the form of Mr Nadar Khan. Similarly his relation with the impersonator and his mobile number in the Nadar Khan NTS form for admission indicate that he has rendered his assistance in impersonation.

4. The case of Mr Muhammad Tariq S/O Muhammad Youşaf Roll No 451700924 village and U.C Madi Baba is quite clear for the following reasons. The picture is of the real candidate Mr Muhammad Tariq and also the video provided by the NTS drawn during the test. His specimen signatures are the same as put in the NTS form for admission. Moreover according to his written statement he has not given the interview for the post of PST and is not willing to avail the chance though he was in the merit list but he has taken the test for CT and is quite optimist to be appointed very soon against CT post.

5. Mr Fazlullah S/O Sawab Jan Roll No 452501222 U.C Madi Baba has also appeared in the same for the same post in the same month at Ansi Degree College Mardan and recently working in police department at Mardan and has done MSc organic chemistry .According to his picture obtained from him during the interview and video provided by the NTS are quite resembling with each other and all his specimen signatures and signature put in the NTS admission form are of the same person Fazlullah. Hence his case is hundred and one percent clear and original. No any ambiguity or suspiclons are found in his case to prove the case as Impersonation.

IT was a herculean task but by the grace of Allah Almighty we conducted the enquiry with our full devotlon and honesty though we have been contacted by many renowned and the persons in ranks to write In the favour of guilty candidates and Impersonators so as to prevent them from legal action against them and were also Sthreatened through different unknown vulgar and rogue yet being patriotic and loyal to our state we completed our mission with courage in the best interest of the public.

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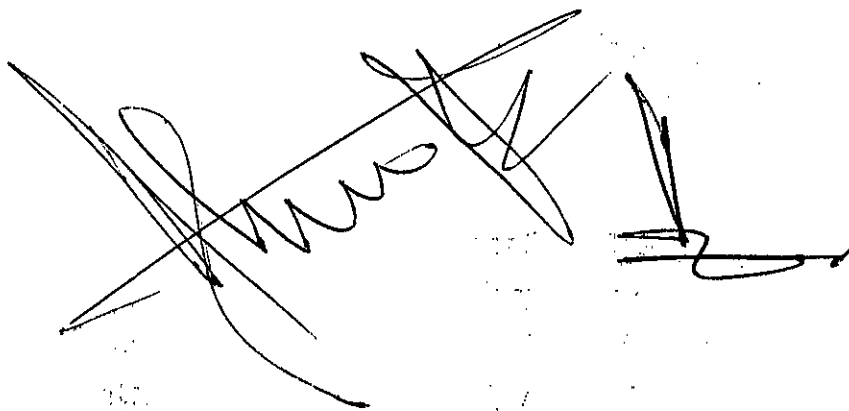
Conclusion

In the light of above findings it is concluded that

1. We requested NTS Organization through DEO repeatedly to provide us the video of Mr Muhammad Waqar S/O Sultan Muhammad U.C Madai Baba but in vain though his specimen signature is quite different from the attendance provided by NTS. It means that it may be impersonation and can be obviously be testified from the video if provided by the NTS.
2. The case of Mr Owais Khan S/O Rahmat Said U.C Madai Baba is clearly testified from the video and attendance sheet of NTS that it is impersonation and the impersonator who has taken the test for him is Mr Zeeshan S/O Wali rahman village Thordher Takar Takht Bhai CNIC No 16102-0867357-1 (Video/photograph attached).
3. The case of Mr Nadar Khan S/O Lal Gul U.C Madai Baba is clearly verified as impersonation from the impersonator's video but unfortunately the impersonator is Mr Jawad S/O Ayaz village Kaloo Shah.
4. Mr Saleh Muhammad has helped them in impersonation.
5. The case of Mr Tariq S/O Mr Yousaf is quite genuine and we found no evidences against him to declare the case as impersonation but he does not want to receive the post of PST.
6. The case of Mr Fazlullah S/O Swab Jan U.C Madai Baba is also genuine and nothing was found to testify his case as impersonation.

Recommendation.

1; The case of Mr. Muhammad Waqar S/O Mr Sultan Muhammad may please be referred to NTS with the request to decide the case and cancel his recommendation for appointment as it is the duty of NTS to fulfill all the essential requirements. And till the complete investigation against him he may please be suspended from his duty and his salary be made inactive.

A large, stylized handwritten signature in black ink is written across the bottom of the page. To the right of the signature, there is a small, rectangular stamp or mark, possibly a date or initials, also in black ink.

2. Mr Owais Khan S/O Rahmat Said may please be dealt according to the law and the next deserving candidate be given a chance for appointment as per policy of the government. The impersonator Mr Zeeshan S/O Wali Rahman village Thordher may be treated according to law.

3. Mr Zeeshan S/O Wali Rahman Village Thordher may please be dealt under the law.

4. Mr Nadar Khan S/O Mr Lal GUL may please be dealt as per policy and the next deserving candidate be given a chance for appointment according to the rules regulations of the government and the impersonator Mr Jawad S/O Ayaz village Kaloo Shah be dealt according to the existing law through law enforcing agency.

5. Mr Muhammad Tariq S/O Mr Muhammad Yousaf may please be dropped from the merit list in the light of inquiry and his written statement.

6. Mr Fazlullah S/O Sawab Jan may please be included in the merit list and be appointed as per policy of the Government.

7. The NTS Organization may please be requested to initiate bio-metric system and thumb of candidate must be put on his answer book and attendance sheet as well during the test.

8; The NTS Organization may please be requested to depute expert examiners who should be selected from government educational institution and not the persons taken from the street.

9. Thumb impression should be made compulsory on the answer sheet as well as in the attendance sheet during the test.

10. Photographs/videos taken during the test by the NTS of the successful candidates in the merit list must be sent to the concerned institutions and through special committees the merit list be made for appointment.

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Enclosures

1. The NTS form of Mr Waqar Ahmad S/O Sultan Muhammad in original, his attendance in the NTS.
2. Original NTS form of Mr Owais Khan S/O Rahmat Said, the photograph of Mr Zeshan S/O Wali Rahman (the impersonator)
3. Original form of Mr Nadar Khan S/O Lal Gul, the picture of his impersonator Mr Jawad S/O Ayaz village Kaloo Shah provided by the NTS organization.
4. Original form of Mr Muhammad Tariq S/O Muhammad Yousaf, his written statement, picture provided by NTS.
5. Original NTS form, picture, response for questionnaire of Mr Fazlullah s/o Sawab Jan.
6. Photo copy of the Application sent to the NTS for providing the videos of Mr Muhammad Waqar and Mr Sardar Ali.

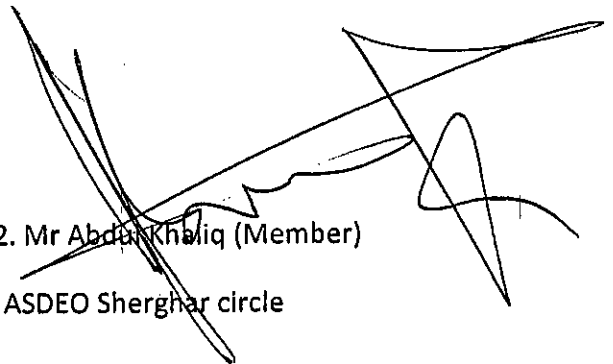
THE END

this enquiry report contains 10 pages and each has been signed by us.

Enquiry Officers.



1. Mr Arshad Hussain (Chairman)
Principal GHS Babuzai Katlan Mardan



2. Mr Abdur Khaliq (Member)
ASDEO Sherghar circle

Request for data

2 messages

District Education Office Male Mardan <deomalemardan@gmail.com>
To: NTS Farman Ullah <farmanullah@nts.org.pk>, tahiraslaml@nts.org.pk

Mon, May 16, 2016 at 11:59 AM

R.Sir,

Please provide the videos and other relevant data of the following candidates in regard of local inquiry

S. No.	Name	Roll No.	CNIC No.	
1.	Awais Khan	452201154	16102-3242527-5	
2.	Mohammad Waqar	602300656	16102-7525605-5	
3.	Nadir Khan	452301048	16102-6980935-5	
4.	Muhammad Tariq	452501222	16102-6309720-3	5. Fazl Ullah

Thanks & Regards

From

District EMIS Cell
District Education Officer
(Male) Mardan Office

NTS Farman Ullah <farmanullah@nts.org.pk>
To: District Education Office Male Mardan <deomalemardan@gmail.com>
Cc: Tahir Aslam <tahiraslaml@nts.org.pk>

Thu, May 19, 2016 at 3:11 PM

Dear Sir,

Kindly find the attach 4 screen shot (video) of the above provided candidates. Roll No.602300656 video not found. The above details candidates original application forms are sent through TCS courier to your office for further necessary action.

Regards and Best wishes


Farman Ullah
Information Officer
NTS Regional Office, Peshawar
Mobile No. 03219124628
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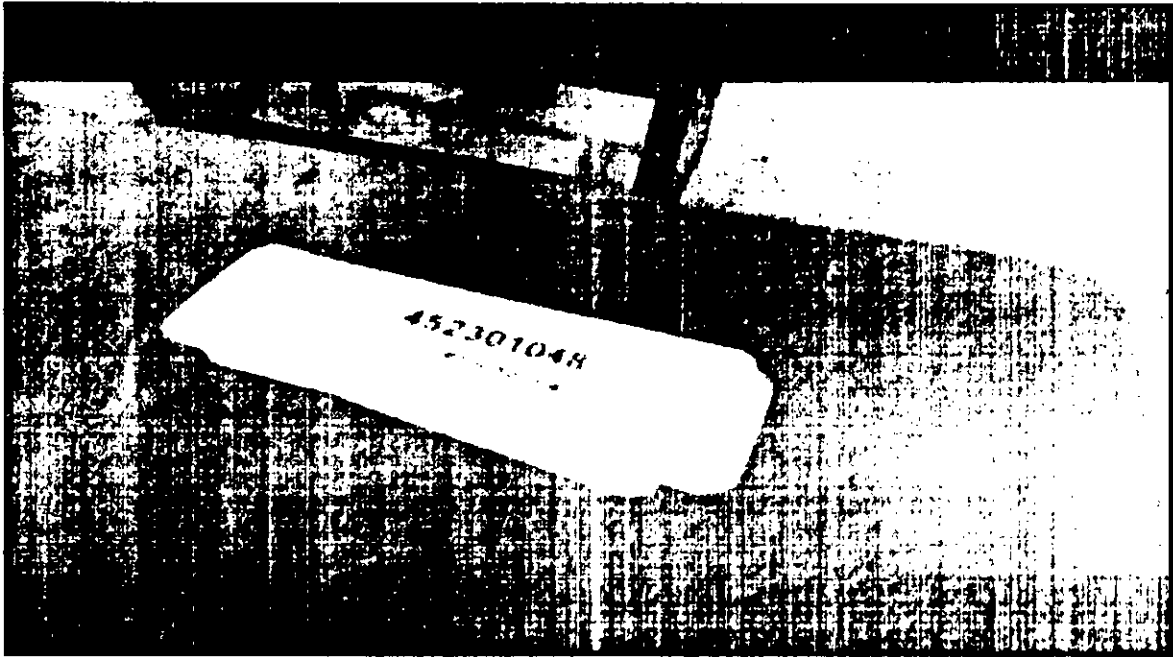
4 attachments

 **451700924 Muhammad Tariq.doc**
1745K

 **452201154 Awais Khan.doc**
1839K

 **452301048 Nadir Khan.doc**
1379K

 **452501222 Fazl Ullah.doc**
1669K



Nadir Khan

Annex "C" 19

OFFICE OF DISTRICT EDUCATION OFFICER (MALE) MARDAN.

Consequent upon in the light of the recommendation of the inquiry committee in the impersonation case in the NTS test 2015-16. Hence the appointment of the following candidate who have appointed vide this office under Endst:No.2145/G Dated 25-03-2016 are hereby withdrawn from the date of issuance.

1. Nadir Khan S/O Lal Gul PST GPS Dandao U/C Madi Baba.

(Siraj Muhammad)
District Education Officer
(Male) Mardan

Endst No: 0187/G

Dated: 20/05 2016

Copy Forwarded to:-

1. Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Department Khyber Pakhtunkhwa Peshawar.
3. SDEO (M) Tehsil Takht Bhai District Mardan.
4. Administrator National Testing Service (NTS) Islamabad.
5. DAO Mardan.
6. Officials Concerned.

19/07/06
District Education Officer
(Male) Mardan

Attended
Haroon
City of Mardan



Registered

Annexure - D - (108) (20)

DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

No. 6602 / Dated 31/08 / 2016.

To,

The DPO
District Mardan.

Subject:

APPLICATION FOR THE REGISTRATION OF AN FIR UNDER THE RELEVANT SECTION OF LAW AGAINST THE CANDIDATES MENTIONED BELOW AT DISTRICT MARDAN ON CHARGES OF IMPERSONATION IN THE NTS TEST HELD ON 28-29/11/2016 AGAINST THE POST OF PST BPS-12.

Memo:-

In continuation of this office letter No.5718 Dated 06-08-2016 and No.6188-G Dated 20-08-2016.

It is stated that during the NTS test as conducted by the NTS authority for the appointment of PST post in the Elementary & Secondary Education Department at District Mardan, the below mentioned officials / candidates have been guilty of impersonation in the NTS test held on 28-29/11/2015 which is evident from the proof provided by the NTS administration on the demand of the undersigned. The written complaints also filed by various candidates.

Therefore it is requested that an FIR under the relevant section of law may be registered against the accused/officials/candidates mentioned below.

Sr #	Name of Candidate	Father Name	U/C Address	Name of Impersonator	F/Name of Impersonator	Address of Impersonator
1	Kashif Muhammad 16102-6942855-3	Dost Muhammad Khan	Bahram Khan Killi U/C Parkho	Jamil Ahmad 16102-0195905-3	Muhammad Bashir	CT GMS Mahmood Abad Vill Kalo Shah Takht Bhai
(2)	Zakria 16102-7380122-5	Hazrat Ahmad	Diyar Abad U/C Parkho	Arshad	Feroz Khan	Unknown
3	Ibrahim Shah 16102-2290759-3	Painda Shah	Mohallah Shah Ba Khel U/C Takkar	Photo Available		Unknown
4	Muhammad Ali 16102-4095893-5	Alam Baz	Shah Noor Pul PO Takkar U/C Narai	Photo Available		Unknown
5	Luqman Shah	Alam Baz	Shah Noor Pul PO Takkar U/C Narai	Muhammad Ali 16102-4095893-5	Alam Baz	Shah Noor Pul Takht Bhai
6	Khurshid 16102-2254510-1	Noshad	Vill Pathi Kala U/C Takkar	Photo Available		Unknown
7	Ifthikhar Ali 16102-2872499-5	Shaukat Ali	Vill Khat Killi Kutab Ghar Takht Bhai U/C Pir Saddi	Rasheed Khan	Misal Khan	PST GPS Sharif Malak Killi

8	Miraj Ul Haq 16102-9939053-1	Shah Nazar	Gujrano Killi U/C Pir Saddi	Rasheed Khan	Misal Khan	PST GPS Sharif Malak Killi
9	Owais Khan 16102-3242572-5	Rehmat Said	U/C Tor Dher Madi Baba	Zeeshan 16102- 0867357-1	Wali Rehman	Village & PO Tor Dher
10	Imran Ahmad 16102-2314944-1	Habib Ur Rahman	U/C Safo Shah	Un Known	-----	-----
11	Nadir Khan 16102-6980933-5	Al Gul	U/C Macey Baba Dandow	Jawad	Muhammad Ayaz	Village Kalo Shah U/C Narai

Siraj Muhammad
District Education Officer
(Male) Mardan

Endst No: 6603/G

Dated: 31/08

Copy Forwarded to:-

1. Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Department Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner for information.
4. Administrator National Testing Service (NTS) Islamabad.

31/8/16
District Education Officer
(Male) Mardan