



SERVICE TRIBUNAL, PESHAWAR

..... Appellant

Service Appeal No. 580/2023 Jamal Rasool s/o Rasool Badshah R/o Kanda Karak Tehsil & District Karak

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa & others

...... Respondents

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Respondents Through Representative

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 580/2023

Jamal Rasool s/o Rasool Badshah

R/o Kanda Karak,

Tehsil & District Karak

..... Appellant

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa & others

...... Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS 1,2,3 & 4

Respectfully Sheweth:-

Preliminary Objections:-

- i. That the appellant has got no cause of action to file the instant appeal.
- ii. The appellant has got no locus standi to file the instant appeal.
- iii. That the appellant is estopped by his own conduct to file the instant appeal.
- iv. That the appeal is bad in eyes of law and not maintainable.
- v. That the appellant has not approached the honorable Tribunal with clean hands.
- vi. That the appeal is barred by law and limitation.

Facts:-

- 1. Correct to the extent that the appellant was charge sheeted for making deceit/fraud in recruitment as Constable in Police department. The appellant had qualified ETEA test for recruitment as Constable for the year 2020-21 and was not recommended in the psychological assessment/ final interview by the Regional Selection Board on account of his mental health condition. The Review Board held at CPO had also not recommended him. Pertinent to mention here is that the recommendation list received from CPO Peshawar at district Karak contained his name as "recommended" while another list provided from SSU (CPEC) CPO Peshawar contained his name as "not recommended". Similarly, the list requisitioned from CPO Peshawar by the Regional Police Officer, Kohat vide 16869/EC dated 25.11.2022 and under the DPO Karak diary No. 14699-720/ E-IV dated 29.12.2021 did not contain his name as "recommended". He fraudulently succeeded in getting his appointment order on the basis of tempered recommendations. (The letters are attached as Annexures-A1, A2 & A3)
- 2. Incorrect, proper departmental enquiry was initiated against the delinquent official by issuing him charge sheet. Enquiry was entrusted to SDPO Takht-e-Nasrati who conducted the enquiry by fulfilling of all codal formalities, recorded statements and collected necessary evidence on record. After concluding the enquiry proceedings, the enquiry officer submitted his finding report wherein the delinquent official was held guilty of gross misconduct and recommended him for major punishment. The respondent No.3 being competent authority heard the appellant, personally. However, he failed to defend himself. The allegations leveled against him were proved during enquiry. Thus, respondent No.3 awarded major punishment after fulfilling all procedural and legal formalities. (Copy of charge sheet, statement of allegations and enquiry report are attached as Annexure-B1, B2, B3).
- 3. Incorrect, the respondents No.2 rejected the appeal of the appellant after perusal of the entire record received from District Karak and CPO as well. Hence, upheld order passed by the respondent No.03.
- 4. That the allegation against appellant had been proved as established in the enquiry findings. Therefore, the appellant's plea is not maintainable under the law, and is liable to be dismissed on the following grounds.

Grounds:

- A. Incorrect, the impugned order was passed in accordance with law & rules as the allegations against the appellant had been proved as established by the enquiry officer in his findings. No malafide on part of respondents is involved.
- B. Incorrect, charges against the appellant were proved during course of enquiry. The appellant was dealt in accordance with law and rules and was also provided proper opportunity of personal hearing.
- C. Incorrect, reply already submitted as para-B above.
- D. Incorrect, the appellant fraudulently succeeded in getting his appointment order on the basis of tempered recommendations and thus, he tried to deceive Police department through such fake appointment. Therefore, he was removed from service in the very start of his appointment.
- E. Incorrect, the list requisitioned from CPO Peshawar by the Regional Police Officer, Kohat vide 16869/EC dated 25.11.2022 and under the DPO Karak diary No. 14699-720/ E-IV dated 29.12.2021 did not contain his name as "recommended". The appellant was terminated from service on the basis of evidences established regarding his fraudulent act.
- F. Incorrect, the competent authority in the light of enquiry findings passed the order according to rules.
- G. Incorrect, the appellant was dealt in accordance with law and rules and has been duly provided opportunity of hearing. The competent authority passed the order after fulfilling of all proceedings and codal formalities.
- H. Incorrect, reply already submitted as para-D above.
- I. Incorrect, the respondents No.2 after perusal of available record received from district Karak and CPO, by hearing the appellant and after fulfilling all the codal formalities and legal procedure, rejected appeal of the appellant and upheld the order of respondent No.2.
- J. Incorrect, the appellant was well informed regarding proceedings of his appeal and the impugned order therein as he was personally called by the appellate authority in his office.
- K. Incorrect, reply already submitted as para-G above. The respondents may also be allowed to advance additional grounds at the time of hearing.

Prayer:-

In the light of the above facts and circumstances it is therefore, requested that the appeal, being devoid of merits, may kindly be dismissed with costs, please.

Govt of Khyber Pakhtunkhwa, Through Chief Secretary

(Respondent No. 4)

Provincial Police Officer/IGP,

Khyber Pakhtunkhwa,

(Respondent No. 1)

District Police Officer

Karak

(Respondent No. 3)

Regional Police Officer

Kohat

(Respondent No. 2)

INSPECTORG CINITAL KHYRIJUP

II ICU

No.

11164 ASIV dated Peshavar the 20 111 /2022

PESHAWAIC

Regional elice Officer, Kohat Revien, Kohat

Subject:

PROVISION O RECRUITMENT RECORD FOR THE YEAR-2021

Memo.

Those refer to your office letter No. 15885/EC dated: 07.11.2022 on the subject noted above.

The requisite Comments /recommendation of CPO Review Board issued vide this office letter No. 71699-720, dated; 29,12,2021 are sent herewith for further necessary action as desired.

(Encl-7 pages)

Registrar

For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar

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District Poll a Officer Karr y

Legible Copy



OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA PESHAWAR

No. 11163 /E-IV dated Peshawar the 22.11.2022

To

The Regional Police Officer, Kohat Region, Kohat.

Subject:

PROVISION OF RECRUTMENT RECORD FOR THE YEAR 2021

Memo

Please refer to your office letter No.15885/EC dated 07.11.2022 on the subject noted above.

The requisite documents/recommendation of CPO Review Board issued vide this office letter No.1699-720, dated 29.12.2021 are sent herewith for further necessary action as desired.

(Encl-7 pages)

(AFSAR JAN)
Registrar
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

AND THE REAL PROPERTY.



OFFICE OF THE INSPECTOR GENERAL OF POLICE. CENTRAL POLICE OFFICE, KHYBER PAKHTUNKHWA.

No. 14699-720EIN

dated Peshawar the 29.12.2021

Tο

The Capital City Police Officer,

Peshawar.

All District Police Officer,

Swat, Dir Upper, Dir, Lower, Shangla, Upper Chitral, Lower Chitral Bajaur, DI Khan, Tank, , Abbotabad, Mansehra, Battagram, Upper Kohistan, Bannu, Lakki Marwat, North Waziristan, Karak,

Mohmand, Mardan and Khyber.

Subject:

Recruitment of Constable in KP Police through ETEA, 2020-21

Please refer to the subject cited above.

As approved by the Competent Authority, the candidates sent by Regional Selectic Board for CPO Review Board has been conducted from 21.12.2021 to 23.12.2021 at Malik Sax Shaheed Police Lines Peshawar. The members of the Board conducted psychological assessment at suitability of all the candidates appeared before the Review Board.

The CPO Review Board finally recommended 13 candidates out of total 119 where 106 candidates were not recommended while 03 candidates found absent.

Detailed report of the Review Board is sent herewith for further necessary action your end:-

S. No.	Name	Father Name	District	Regional Selection	CPO Review Bo
				board Recommendation	· Simme Soloctio
1.	Bilal Khan	Jamshid	Swat	Not Recommended.	Not Recommend
2.	Muhammad Ayaz	Muhammad Rasheed	Swat	Not Recommended	Not Recommend
3.	Ayub Khan	Akhtar Munir	Dir Upper	Not Recommended	Not Recommen
4.	Afzal Izaz Khan	Muhammad Shah Khan	Dir Lower	Not Recommended	Not Recommend
5.	Akhtar Ali	Mukamal Khan	Shangla	Not recommended.	Not Recommen
. 6.	Izhar Ahmed	Abdul baser	Shangla	Not Recommended	Not Recommen
7.	Haneef Muhammad	Hasan Muhammad	Bajaur	Not Recommended.	Not Recommen
8.	Saadat Ullah	Khaista Rehman	Bajaur	Not Recommended.	Not Recommen
9.	Hiddayat Ullah	Sher Zamand	Bajaur [§]	Not Recommended	Not Recommen
10.	Shoib Khan	Ghulam Farooq	Bajaur	Not Recommended	Not Recommen
11.	Zewar shah	Gran Syed	Bajaur	Not Recommended.	Not Recommen
12.	Imtiaz Ali	Raza Khan	Bajaur	Not Recommended.	Not Recommer

And the second

		_			
13.	Mursaleen	Shah Jehan	Bajaur	Not Recommended	Not Recomm
14.	Sami Ullah	GhulamYounas	Bajaur	Not Recommended	Recommen
15.	Mujahid	Toor Khan	Bajaur	Not Recommended.	Not Recomm
16.	Races Ahmed	Shah Zarin Khan	Bajaur	Not Recommended.	Not Recomm
17.	Kifayat Zeb	Muhammad Younus	Bajaur	Not Recommended.	Not Recomme
18.	Fareed Ullah	Khan Zada	Bajaur	Not Recommended.	Not Recomme
19.	Nawab Zada	Sahib Zada	Bajaur	Not Recommended	Not Recomme
20.	Niamat Ullah	Sarwar Khan	Bajau	Not Recommended.	Not Recomme
21.	Abdul Salam	Noor Muhammad	Bajaur	Not Recommended.	Not Recomme
22.	Muhammad Irfan	Sahib Kareem	Bajaur	Not Recommended.	Not Recomme
23.	Shoukat Ali	Hazrat Munir	Bajaur	Not Recommended.	Not Recomme
24.	Stana Gul	Ziarat Gul	Bajaur	Not Recommended.	Recommend
25.	Riaz Khan	Ziarat Gul	Bajaur	Not Recommended.	Not Recomme
26.	Usman Khan	Meer Afzal Khan	Bajaur	Not Recommended.	Absent
27.	Gul Zaman Khan	Jan Muhammad	Bajaur	Not Recommended	Not TAbsenti
28.	Abdul Zahid	Abdul Majeed	DI Khan	Not Recommended!	Not Recomme
29.	Muhammad Idress	Saif Ullah	DI Khan	Not Recommended	Not Recomme
30.	Binyamin	Rabyamin Khan	Tank	Not Recommended.	Not Absent
31.	Saif ur Rehman ,	Muhammad Iqbal	Tank,	Not Recommended	Not Recomme
32.	Noor Muhammad	Sher Muhammad	Upper, Chitral	Not Recommended	Not Recomme
2. 33.	Abid Hussain	Shah Nawaz Khan	r > person	no stream condest	Recommen
21.	Shah Now	Shan Nawaz Khan	Upper Chitral	Not Recommended. L. Mor Recommended.	Not Recomme
34.	Najmud Din Khan	Sharafat Uddin	Upper	Referred to CPO	Recommend
- 42	3 1.00	Khan	Chitral	Review Board.	
5.	Irshad ur Rehman	Mujeeb ur Rehman	Upper	Not Recommended	Recommend
			Chitral ·	Nor Parimilanded	Not Recomme
66. Gr	Nazir Ahmed	SherWali Shah	Upper	Not Recommended	Not Recommen
	D 37/11/11	F 13	4421	, vot voce lancadede	+ et Abrent,
	Dinar Wali Khan	Muhammad Afzal	Lower Chitral	Not Recommended -	Not Recommended
 8.	Muhammad Idres	Mujahiden	Lower,	Not Recommended	
			Chitral	H ()	Not Recommer
9.	Muhammad Salim	Rahmat Karim	Lauran	No. 2	No Pegrannia
3	Tanga Tanga tanga	Namat Karm	Lower, Chitral	Not Recommended	Not Recommer
0.	Imtiaz Ali	Soroom Khan	Lower	Referred to CPO	Dunn friend
	2m.h		Chitral	Review Board.	Not Recommen
1.	Muhammad	QaziSardar	Abbottabad	Potenta CPO	Decommond
	Shehzad	Muhammad	vonditagad	Referred to CPO + Review Board	Not Recommen
2.	Zeshan Ahmed	Muhammd Arfan	Abbottabad	Most Divine experted sides to	Vint Distantine
	1 .	Abbasi	- รากกาแขกขด	Not Recommended	Not Recommend
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43.	Sami Ullah	Muhammad Shabir	Mansehra	Referred to CPO Review Board.	Not Recomme
44.	Muhammad Hamza	Muhammd Nazir	Mansehra	Not Recommended	Not Recomme
45.	Syed Husnain Haider Naqvi	Bashir Hussain Shah	Mansehra	Referred to CPO Review Board.	Not Recomme
46.	Muhammad Hassan Rehman	Muhammad Asif ur Rehman	Mansehra	Referred to CPO Review Board.	Not Recomme
47.	Abd ur Raheem	Qalandar Khan	Battagram	Not Recommended	Not Recomme
48.	Inam ur Rehman	Umar Rehman	Battagram	Not Recommended	Not Recomme
49.	Zahid Ali	Amreen Khan	Battagram	Not Recommended.	Not Recomme
50.	Din Muhammad	Kino	Kohistan	Not recommended.	Not Recomme
51.	Noor Qadeem	Mumtaz	Kohistan	Not Recommended.	Recommend
52.	Hazrat Umber	Abdul Jabar	Kohistan	Not Recommended	Not Recomme
53.	Shah Zaman	Fazal Khan	Kohistan	Not Recommended	Recommen
54.	Muhammad Sherbaz Khan	Said Ullah	Kohistan	Not Recommended	Not Recomme
55.	Aurangzeb	Hakim Dad Urf Hagro	Kohistan	Not Recommended	Not Recomme
56.	Rahid Dad Khan	Abdul Haq	Kohistan	Not Recommended	Not Recomme
57.	Ehsan Ul Haq	Taj Muhammad	Kohistan	Not Recommended.	Not Recomme
58.	Muhammad Zada	Sahib Zada	Kohistan	Not Recommended	Not Recomme
59.	Sher Bahar	Kemia Malik	Kohistan	Not Recommended.	Not Recomme
60.	Hidayat Ullah	Pir Zada	Kohistan	Not Recommended	Not Recomme
61.	Gul Baz	Behram	Kohistan	Not Recommended	Not Recomme
62.	Gul Muhammad	Abdul Matin	Kohistan	Not Recommended	Not Recomme
63.	Muhammad Zaman	Dalo Malik	Kohistan	Not Recommended	Not Recomme
64.	Ahmed Zada	Gul Nazar Khan	Kohistan	Not Recommended	Not Recomme
65.	Noor Din	Asghar Khan	Kohistan	Not Recommended	Not Recomme
66.	Dar Jahan	Mir Afzal	Kohistan	Not Recommended	Not Recomme
67.	Lal Shahzada	Dar Jehan	Kohistan	Not Recommended	Not Recommen
68.	Gohar Ayub Khan	Ayub Khan	Bannu	Not Recommended	Recommend
69.	Atif Ullah	Banaraz Khan	Bannu	Referred to CPO Review Board.	Not Recommer
70.	Adnan Khan	Mir Aslam Khan	Bannu	Not Recommended	Not Recommer
71.	Inam Ullah	Mohamad Shah	Bannu	Not Recommended	Not Recommer
72.	Minhaj Khan	Sher Wali Khan	Bannu	Not Recommended	Not Recommer
73.	Nasim Ullah Khan	Rafi Ullah Khan	Bannu	Not Recommended	Not Recommer
74.	Anwar Ullah Khan	Ajab Khan .	Bannu	Not Recommended	Not Recommen
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gmr/s

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1					Page 4 of
·	Hadayat Ullah khan	Toor Ali Khan	Bannu	Not Recommended	Not Recommende
76.	Rohail Khan	Ghani Rahman	Bannu	Not Recommended	Not Recommende
77.	Mahmood Khan	Sher Daraz Khan	Bannu	Not Recommended	Not Recommende
78.	Zakir Ullah Khan	Ghulam Sadiq Khan	Bannu	Not Recommended	Not Recommende
79.	Sher Baza Khan	Ghulam Nawaz Khan	Bannu	Referred to CPO Reviews Board.	Not Recommende
80.	Shahzeb Khan	Sami ullah Khan	Bannu	Referred to CPO Review Board.	Not Recommende
81.	Wajahat Ali Khan	Raza Ali Khan	Bannu	Not Recommended	Not Recommende
82.	Luqman Khan	Mughal Baz Khan	Bannu	Not Recommended	Not Recommend
83.	Shah Zeb Khan	Muhammad Sadiq Khan	SDW . Bannu	Referred to CPO Review Board.	Not Recommend
84.	Muhammad Yasir	Qadir Nawaz Khan	SDW Bannu	Not Recommended	Not Recommend
85.	Junaid Nawaz	Badshaheer Khan	SDW Bannu	Referred to CPO, review Board.	Not Recommend
86.	Khadim Mehmood	Muhammad Shafiq Khan	SDW Bannu	Referred to CPO, review Board.	Not Recommend
87.	Mosad Khan	Sarfaraz Khan	SDW Bannu	Referred to CPO, review Board.	Not Recommend
88.	Shoaib ur Rehman	Muhammad Sharif Khan	SDW Bannu	Not Recommended.	Not Recommend
89.	Sami Ullah	Mir Shahzad Gul	SDW /- Bannu	Not Recommended	Not Recommend
90.	Shah Sawar	Babar Khan	Lakki Marwat	Not Recommended	Not Recommend
91.	Habib Ullah Khan	Sher Nawaz	Lakki Marwat	Not Recommended	Not Recommend
92.	Tahsin Ullah	Dilawar Khan	Lakki Marwat	Not Recommended	Not Recommen
93.	Ihtisham Ul Haq	Akbar Zaman	Lakki Marwat	and was medically	Recommende
				unfit at the time of Regional Selection Board, Bannu. He is	
				considered as fresh candidate in CPO Review Board due to	· :c
				his genuine medical reason.	, with
94.	Abdur Rahim	Sorana Khan	Lakki Marwat	Not Recommended	Not Recommendation
95.	Muhammad Junaid Iqbal	Muhammad Iqbal	Lakki Marwat	Not Recommended	Not Recomme

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96.	Muhammad Younus	Nawab Khan	North Waziristan	Referred to CPO, review Board.	Not Recommen
97.	Qayam ud Din	Abdul Karim	North Waziristan	Not Recommended	Recommende
98.	Danish Aziz	Abdul Aziz Khan	Karak	Referred to CPO, review Board.	Recommende
99.	Bilal Ahmed	Sohail Badshah	Karak	Not Recommended	Not Recommend
100.	Muhammad Ibrar	Turab Din	Karak	Not Recommended	Not Recommend
101.	Nadeem Saleem Khan	Salem urRehman	Karak	Not Recommended	Not Recommend
102.	Jamal Rasool	Rasool Badshah	«Karak	Not Recommended	Not Recommend
103.	Adnan Khan	Gul Muhammad Khan	Mohmand	Not Recommended	Not Recommend
104.	Zakir Khan	Dir Nawab Khan	Mohmand	Not Recommended	Not Recommend
105.	Aamir	Jan Bahadar	Mardan	Referred to CPO, review Board.	Not Recommend
106.	Muhammad Irfan	Lal Umer	Mardan	Referred to CPO Review Board.	Recommended
107.	Abdul Jabar	Abdul Samad	Peshawar	Referred to CPO review board.	Not Recommend
108.	Tabarak Shah	Haleem Shah	Peshawar	Not Recommended	Not Recommend
109.	Wisal Ahmed	Iftikhar Ahmed	Peshawar	Referred to CPO Review Board.	Not Recommend
110.	Daud	Fazal Rehman	Péshawar	Referred to CPO review board.	Not Recommend
111.	Jawad Khalil	Awal Sher	Peshawar	Not Recommended	Not Recommende
112.	Waqas Khan	Abdul Manan	Peshawar	Not Recommended.	Not Recommende
113.	Muhammad Farooq	Muhammad Niqab	Peshawar	Referred to CPO review board.	Not Recommende
114.	Abbass Khan	Sarfaraz Khan	Peshawar	Referred to CPO reviews board.	Not Recommende
115.	Saqib Khan	Nisar Muhammad Khan	Peshawar	Not Recommended	Not Recommende
116.	Muhammad Asim	Muhammad Shah	Peshawar	Referred to CPO review board.	Recommended
117.	Shafi Ullah	Mushtaq Ahmed	Khyber	Not Recommended	Recommended
118.	Nadeem Sadiq	Farhad	Khyber	Not Recommended	Not Recommende
119.	Muhammad Asif	Haji Gul	Khyber	Not Recommended	Not Recommende
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20.	Shabir Ahmed	Muhabbat Khan	Khyber	Not Recommended	Not Recom
121.	Abdul Azim	Muhammad Farooq	Khyber	Referred to CPO Review Board.	Not Recom
122.	Amin Ullah	Yar Akbar	Khyber	Not Recommended	Not Recom

(Lt Cdr (R) Kashif Affab Ahmad Abbasi I

AIG/Establishment,
For Inspector General of Police,

Khyber Pakhtunkhwa,
Peshawar.

CC:-

Copy of the above is forwarded to the:-

- 1. All Regional Police Officers, in Khyber Pakhtunkhwa.
- 2. DIG/HQrs: Khyber Pakhtunkhwa.
- 3. PSO to IGP, Khyber Pakhtunkhwa.
- 4. DSP Operation with the direction to inform all the officers.
- 5. PA to AIG/Establishment, Khyber Pakhtunkhwa.

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In compliance with the Worthy Inspector General of Police, Khyber Pakhtunkhawa Peshawar letter Endst: No. 2847-90/E-IV, dated 03.03.2021 and No. 2810-46/E-IV dated 03.03.2021, No. 11336-46/E-IV, dated 04.11.2021 & No. 12601/E-IV, dated 23.12.2021, regarding recruitment of constables through ETEA merit list-2021, and Regional level review board Kohat Region, Kohat vide Memo: No. 18658-64/EC, dated 22.11.20121 and CPO level review board vide Memo: No. 14699-720/E-IV, dated 29.12.2021, out of 130 candidates of ETEA list-2021 in which two (02) candidates at serial No. 58 & 128 were not recommended due to psychological assessment & suitability test by CPO Review Board and one (01) candidate at serial No. 28 remained absent before Regional Selection Board while three (03) candidates at serial No. 90, 110 & 118 were deficient in height as per required criteria/policy in vogue. One hundred twenty four (124) candidates were declared fit as per required criteria. Therefore, the following one hundred twenty four (124) candidates are hereby enlisted/recruited as Constables BPS-07 (10990-610-29290) against 53 vacancies of SSU (CPEC), 51 vacancies of this district Police & 20 vacancies of FRP as noted against each their names subject to medical fitness and verified to be good moral characters/antecedents from local Police as well as Special Branch Karak and academic verification. Their services are liable to be terminated within 14 days without assigning any reason. They are allotted the following constabulary numbers as noted against each their names.

r, 0	Name of candidate	Son of	Date of Birth	Edu	lleight	Chest	Const: No.
-	Hassan Rauf	Muhammad Rauf Khan	15.03.2002	F.Sc	5"-8"	34 X 35 ½ "	2235
 -	Kifayat Ullah Khan	Inayat Ullah Khan	10.08.1997	135	5"-8 ¼ "	36 ½ X 38 ½ ".	. 2236
	Asif Usinan	Shahbaz Khan	07.03.1996	DA E	5"-10"	37 X 38 ½ "	2237
	Danish Aziz	Abdul Aziz Khan	01.09.1999	FA	5"-10 1/4	33 " X 35"	2238
	Naimat Ullah	Ghulam Qadir	29.03.1995	BS	5"-9 1/4 "	33 1/2 X 35	2239
	Muhammad Ismail	Khail Zamir	05.05.1995	. BA	5"-7 "	35 X 36 1/2	2240
· +	Abdullah Hassan	Abdur Rashid	12.04.1996	F.Sc	6"-00 "	36 ½ X 38"	2241
	Johad Sarwar	Arbab Khan	15.04.1998	FΛ	5"-9 "	35 X 37"	2242
- - -	Danish Kamran	Khan Gul	30.10.1995	BA	5-91/2	34x37	2243
-	Qasim Usman Noor	Akhtar Manoor	12.02.2000	F.Sc	5"-9 ½ "	33 X 34 1/2 "	2244
	Abdul Khaliq	Azad Khan	06:08.1999	F.Sc	5"-8 "	33 X 34 1/2	2245
	Asif Nawaz	Muhammad Gul	15.04.1995	BS	5"-7 "	34 X 35 1/2	2246
	M. Zafar Yousaf	Yousaf Khan	06.06.1996	F.Sc	5"-9 1/2 "	34 × 35 1/2	2247
	Adnan Saced	Ahmad Saced	01.03.1999	F.Sc	5"-9 ¼ "	33 × 34 1/2	2248
. -	Mohsin Farid	Farid Ullah Khan	02.06.1995	ВА	5-73/4	35x37	227
·	Ishtiaq Ahmad	Azad Khan	31.03.2000	F.Sc	5"-10 "	33 X 34 1/2	2250
	Umer Saced	Lai Saced Jan	28.02.2001	F.Sc	5" 7 %	33 X 35	2251

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Wajid Hussain	Hazrat Gul	01.05.1996	BS	5"-8 ¼ "	36 X 38	2252
Umar Ali	Asgher Khan	.18.10.1997	10 th	5"-7 ¾ "	34 X 36	2253
Aman Ullah	Nazar Din	05.08.1998	F.Sc	5"-7 ½ "	35 X 37	2254
Mubashir Khan	Muhammad Hayat Khan	03.03.1995	BS	5"-7 1/2 "	38 X 40	2255
Mubashir Mahmood	Mahmood Badshah	08.03.1996	F.Sc	5"-10 "	35 X 36 1⁄2	2256
Muhammad Yasir	Khattak Ghafoor Rehman	10.08.1998	F.Sc	5"-9 ½ "	33 ½·X 35	2257
Sana Ullah	Mumtaz Khan	16.04.1999	F.Sc	5"-7 ½ "	33 X 34 ½	2258
Saqib Ullah	Haji Rehman	10.04.2001	F.Sc	5"-9 "	33 X 35 ½	2259
Ahmad ANWAR	Muhammad Ayub	16.06.2001	F.Sc	5"-8 "	36 X 38	2260
Muhammad Furgan	Phool Badshah	03.05.1996	ВА	5"-9 1/2 "	33 ½ X 35	2261
Basit ALi Khan	Nazar Ali Khan	10.10.1996	F.Sc	5"-9 1/2 "	36 X 38	2262
Jamshid Iqbal	Anar Zaman	23.03.1997	B.C.	5"-7"	34 1⁄2 X 36	2263
Dil Faraz Khan	Masood Khan	03.09.1997	- 0m 10 ^փ	5"-9 "	36 X 37 ½	2264
Mohaib Ullah	Khair Ullah	15.04.1998	F.Sc	5″-9 ¾ ″	34 X 35 1/2	2265
Safdar Hayat	Amir Sultan	05.04.1999	F.Sc	5"-7 "	34 X 35 1⁄2	2266
Saleem Ullah	Mumshad Ali Khan	10.04.1999	F.Sc	5"-8 1/2 "	36 ½ X 38	2267
Muhammad Zubair	Umar Hayat	02.04.2001	F.Sc	5"-7 ½ "	35 X 36 ½	2268
Muhammad Luqman	Sher Nawaz Khan	14.08.1996	F.Sc	5"- 9 "	36 X 38	2269
Hamayoon Saif Ullah	Abdul Saboor Khan	01.04.1997	MA	5"-8 "	33 1⁄2 X 35	2270
Arshad Mehmood	Khaliq Ur Rehman	18.04.1998	ВА	5"-8 "	36 X 37 1/2	2271
Rizwan Ullah Shah	Gul Hassan Shah	15.04.1999	· BA.	5"-8"	35 X 37	2272
Farman Ullah	Mumtaz Khan	14.09.2000	F.Sc	5"-8 ¼ "	34 ½ X 36	2273
Muhammad Altaf	Muhammad Sajjad Khan	23.03.1997	BS	5"-9 1/2 ".	34 X 36	2274
Tajamal Raza	Hassan Pur	01.04.1997	BS	5"-7"	34 ½ X 36	2275
Fawad Ullah	Muhammad Haleem	03.08.1997	·F.Sc	5"-8 "	35 ½ X 37	2276
Reliman -ud -Din	Riaz -ud- Din	23.12.1997	BA	5"-9 ½ "	33 X 35	2277
Muhammad Adnan	Turab Din	24.02.1998	F.Sc	5"- 10 "	33 ½ X 35	2278
Muhammad Amir	Muhammad Jalal	06.03.1998	ВА	5"-9"	34 ½ X 36	2279
Junaid Muhammad Afnan	Shah Jahan	01.09.2002	PSc	5"-10 1/2	34 ½ X 36	2280
Bilal Ahmad	Sohail Badshah	04.04.1995	F.Sc	5"-73/4"	34 X 3 5 ½	2281
Muhammad Shoaib	Mir Salam Khan	07.09.1996	BA	6"-00 "	28 X 40	2282
Qadir Ullah	Islam Din	02.04.1997	F.Sc	5"- 9 "	94 X 36	2283
Muhammad	Awal Zaman	10.04.1995	BA	5"-8"	33 ½ X 35	(2281
Ikhtisham Hussain Ahmad	Nazar Khan	11.04.1997	BS	5"-9"	36 X 37 1/2	2285
Nacem Igbal	Abdul Fayyaz	15.02.1998	FA	5" 9 1/2"	33 X 34 ½	2286
Muhammad Shahzad	Abdul rayyaz	02.03.1998		5"-8 ½"	36 X 37 1/2	2287
	Wilayat Khan	26.03.1998	10 th	5"- 10 1/2	35 X 37	466
Mehtab Alam	whayat Khan	20.03.1990			<u> </u>	<u> </u> ,



55.	Altaf Gohar	Gul Niaz Khan	01.04.1998	F.Sc	5"- 10 ½	36 X 38	772
56.	Junaid Iqbal	Nasr Ullah Jan	21.08.2000	F.Sc	5"- 10 ½	35 ½ X 37	75
57.	Faisal Nadeem	Umer Hayat	02.03.1996	DA E	5"- 7 "	33 X 35	497
58.	Umar Naseem	Umar Jalar	.02.01.1998	BA	5"-7"	39 ½ X 41	751
59.	Saif Ullah	Sher Afzal	02.03.1999	F.Sc	5"-8"	34 X 35 ½	523
60.	Kamil Iqhal	Muhammad Iqbal	06.04.1999	F.Sc	5"- 11 "	36 X 38	283
61	Yasir Nadeem	Badi Uz Zaman	06.04.1999	BA	5"-9 1/2 "	37 X 39	470
62.	Uzair Ahmad	Wahid Gul	12.04.1999	BΛ	5″- 10 ″	35 X-37	571
63.	Qaiser Ali	Azmat Ali Khan	11.11.1999	F.Sc	5"-7"	33 X 34 ½	250
64.	Zahid Ullah	Ghulam Qadir Khan	02.04.2000	10 th	5"-714"	35 X 36 ½	156
65.	Abdus Samad	Aurangzeb	14.09.1995	BA	5"- 7."	36 X 38	431
66.	Khurram Shahzad Hassan	Hassan Zamir	30.01.1995	F.Sc	5*-7"	34 1⁄2 X 36	887
67.	Zahir Ullah	Noor Ghani Khan	04.04.1997	BSc	5"-7 1/4	33 X 35	898
68.	Nasir Ullah	Gu) Saif Khan	27.03.1998	BA	5"-7"	34 X 36	212
69.	Muhammad Khalfan	Muhammad Sharif	02.08.1998	ВА	5"- 7"	34 X 36	538
70.	Hidayat Ullah	Rahim Badshah	30.03.1999	BA	5"-8"	35 X 36 ¼ 35 ¼ X 37	572 135
71.	lhsan Ayaz	Malak Ayaz	04.04.1999	F.Sc	5"-81/4."	1/2	
72.	Asif Nawaz	Noor Badshah	12.12.1999	F.Sc	6"- 00 "	34 X 35 1/2	468
73.	Muhammad Waqas	Muhammad Shafiq	01.01.2000	F.Sc	5"-9"	36 X 38	903 728
74.	Musaddiq Yasin	Naseer Ullah	01.04.2000	· F.Sc	6"- 00" 5"- 8 "	33 ½ X 36	59
75.	Muhammad Siraj	AKhir Zaman	09.07.2000	10 th		34 X 35 ½	370
76.	Muhammad Junaid		07.05.1996			34 ½ X 36	83
77.	Adnan Saddique	Ghulam Saddique	08.04.1998	ВЛ	5"- 8 ¼ "	33 X 34 ½	<u> </u>
78.	Wajahat Sohail	Umar Khan	15.04.1998	; F.Sc	5"-834	33 1⁄2 X 35	432
79.	Naheed Usman	Muhammad Usman	25.08.1998	BA	5"-8 "	33 X 35	214
80.	Irfan Ullah	Haider Khan	01.09.1998	ВА	5"-81/2"	33 ½ X 35	106
81.	Azhar Mehmood	Muhammad Ali	01.03.1999	BA	5-9.1/2	36x38	750
82	Saqib Salcem Khattak	Gul Saleem Khattak	26.10.2000	F.Sc	5"- 71/2 "	35 1/2 X 37	525
83.	Muhammad Yasir	Qabil khan	05.05.2001	F.Sc	5"-7"	35 X 36 ½	678
84.	Gul Hayat Khan	Zar Macen Khan	19.10.1995	BA	5"-10 "	43 X 45	771
85.	Atif Izaz	Izaz Gul	17.04.1996	BS	5"-7	34 ½ X 36	120
86.	Shah Fahad Zaman	Umer Zaman	18.10.1996	F.Sc	5"- 11 "	33 X 34 1/2	130
87.	Hayat Ullah	Rasul Zaman	02.01.1997	F.Sc	5"-7"	33 X 35	
88.	Nasir Hayat	Zar Muhammad	15.03.1998	ВА	5"-7"	35 X 3 6 1/2	152
89.	Kifayat Niaz	Raheem Ullah Khan	01.04.1998	F.Sc	5"- 10 "	33 X 35	546
90.	Amin Ullah Khan	Rambail Badshah	01.09.1998	1		33 X 35	830
91.	Muhammad Haris	Azad Khan	15.03.2000	F.Sc	5"- 10 "	33 ½ X 35	443
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12.	Najceb Ullah	Wali ul Zaman	20.07.2000	F.Sc	5"- 10 1/4	. 37 X 38 1/2	233,
3.	Hikmat Ullah	Memzad Gul	02.03.1995	. BA	5"-91/2	36 X 38	177.
14 .	Waseom Ullah Hassan	Mir Hassan Khan	03.03.1996	BA	6"-1"	34 X36	782
5.	Muqadas Khan	Akhter Nawaz	05.03.1999	F.Sc	5"- 11 1/2	34 X36	39
16.	Abdus Samad	Abdullah Khan	15.04.1999	F.Sc	5"-81/4	38 X 40	92
7.	Zahir Rehman	Zahid Rehman	10.09.1999	F.Sc	5"-9 "	35 X 37	293
8.1	Haris Bin Zia	Zia Ul Haq	24.05.2001	FA	5"-81/4"	36 X 38	360
9.	Waqas Gul	Gul Mut Ali Khan	06.09.2001	F.Sc	5"-9"	34 X 35 ½	409
00.	Qadeer Ullah	Yousaf Khan	05.04.1996	FΛ	5"- 7 "	37 ½ X 39	457
01.	Rashid Ullah	Baghdali Khan	16.04.1996	BS	5"- 9 ½	33 X 35	338
02.	Zafran Ahmad Khan	Saeed Ahmad Khan	04.08.1996	ВЛ	5"-7 1/2	33 X 34 ½	301
03.	Muhammad Touseef	Marshala Khan	15.03.1997	MA	5"-9 "	34 X 36	829
04.	Majid Bin Khalid	Muhammad Khalid Khan	19.03.1999	. 10 th	5"- 9 1/2 "	33 X 35	291
05.	Muhammad Tufail	Muhammad Niaz	31.03.2001	F.Sc	5"- 8 1/4 "	34 1/2 X 36	1969
QG.	Musawer Ghafar	Gul Ghafar Khan	04.03.2002	10 th	5"-71/2	35 X 37	5361
07.	Saced Ullah Khan	Asal Khan	01.09.1997	10 th	5"-83/4	35 X 37	5659
08.	Muhammad Zeeshan Umer	Umar Nawaz Khan	03.11.1997	10 th	5"- 8 ½ "	33 ½ X 35	5373
09.	Abdul Samad	Habib Ullah Shah	31.03.1999	ВА	5"-7"	33 X 34 ½	5895
10.	Muhammad Kashif	Noor Muhammad	04.04.2000	F.Sc	5"- 10 "	33 X 34 ½	4983
11.	Shoaib ur Rehman	Saced Rehmn Saddique	25.04.2001	10 th	5'-7 1/2 "	33"x34 ½	5773
12.	Hassan Ayaz Ahmad	Azad Khan	09.11.1995	F.Sc	5"- 10 ½	33 X 34 1/2	5733
13.	Sajid Ullah	Umer Khan ud Din	25.02.1998	BA	5"-9 "	39 1/2 X 41	5654
14.	Khalid Usman	Muhammad Rauf	02.07.1998	F.Sc	5"-91/4"	83 X 34 1/2	5535
15.	Mussadiq Rehman	Muhammad Races Khan	•23.09.1998	F.Sc	5"-81/2"	33 X 35	4964
16.	Ovais ilahi	Atta Hussain	15.06.2001	F.Sc	5"-7½"	33 X 35	Control
17.	Tariq Rehman	Hakeem Badshah	25.07.1998	F.Sc	5"- 9 "	36 X 38	5 019
18.	Abdul Wasi	Eid Nawaz	20.09.1999	F.Sc	5"- 9 ½	34 ½ X 36	5836
19.	Arshad Iqbal	Hameed Gul	16.08.2001	F.Sc	5"- 7 1/4	33 ½ X 36	5961
20.	Farman Ullah	Muhammad Sharif	01.01.1998	F.Sc	5"- 7"	33 X 34 1/2	4975
21.	Ahmad Ullah	Noor Shahbaz	31.08.1998	10 th	5"- 7 1/2	33 X 34 1/2	5866
122.	Misbah Ullah Khan	Sher Gul Khan	09.01.2001	F.Sc	5"- 10 1/4	33 X 34 1⁄2	5867
	Jamal Rasool	Rasool Badshah	04.04.1999	10 th	5"- 10 1/2	36 ½ X 38	4984
123.	1 **	1		1 .	.,,		

0.B.No. 729 Dated 30/12 /2021

AMAN AMAN

District Police Officer, K

OFFICE OF THE DISTRICT POLICE OFFICER, KARAK

No $\frac{29-35}{10}$ IOHC, dated Karak $\frac{4-1}{1202}$

Copy of above is submitted for favour of information to:-

- 1. The inspector General of Police, Khyber Pakhtunkhawa Peshawar w/r quoted above.
- 2. The Dy: Inspector General of Police, Kohat Region Kohat w/r quoted above.
- 3. The Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar.
- 4. The Commandant FRP, Khyber Pakhtunkhwa, Peshawar.
- The Assistant Inspector General of Police, Establishment Khyber Pakhtunkhwa, Peshawar.
- 6. The SP FRP Kohat Range Kohat.
- 7. Pay officer for necessary action.

District Police Officer, Karr

No. 90 /Enq Dated 0 8 / 0 6 /2022

CHARGE SHEET

i, SHAFI ULLAH, District Police Officer, Karak as a competent authority, hereby charge you Recruit Constable Jamai Rascol No. 4984 of FRP Strength as follows:-

"From the perusal of relevant record received from CPO Peshawar that you recruit Constable Jamal Rasool No. 4984 s/o Rasool Badshah qualified ETEA test 2021 for recruitment as Constable. Later on, your nomination in psychological assessment and suitability test for recruitment as Constable in the Police department was rejected by the Regional Selection Board Kohat due to your weak/poor health condition. The list received from CPO Peshawar wherein you were shown recommended for recruitment while the original list received from SSU (CPEC) wherein you were also not recommended by the CPO review Board. You recruit constable made fraud/deceived for recruitment as constable in the Police department. This act on your part Indicates you intentionally collaboration & indulging with anybody else at CPO Peshawar to change in the list received from the CPO Peshawar for your ulterior motive. This speaks highly quite adverse on your part and shows your malafide intention, willful breach and malpractice in the discharge of your official obligations."

- 3. By the reason of your commission/emission, constitute miss-conduct under Police disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police Department, you have rendered your-self liable to all or any of the penalties specified in Police Rule-1975 ibid.
- 4. You are, therefore, required to submit your written defense within 07-days of the receipt of this charge sheet to the enquiry Officer Mr. Saif ur Rehman, SDPO TN is hereby appointed for the purpose of conducting enquiry.

Your written defense if any should reach to the Enquiry Officer within a stipulated period, failing which shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

3. Intimate whether you desire to be heard in person.

A statement of allegation is enclosed.

District Police

DISCIPLINARY ACTION

I, SHAFI ULLAH KHAN, District Police Officer, Karak as a competent authority, is of the opinion Recruit Constable Jamai Rasool No. 4984 of FRP Strongth has rendered himself liable to be proceeded against on committing the following act/commission within the meaning of Police Disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police Department.

STATEMENT OF ALLEGATIONS

*From the perusal of relevant record received from CPO Peshawar that you recruit Constable Jamal Rasool No. 4984 s/o Rasool Badshah qualified ETEA lest 2021 for recruitment as Constable. Later on, his nomination in psychological assessment and suitability test for recruitment as Constable in the Police department was rejected by the Regional Selection Board Kohal due to his weak/poor health condition. The list received from CPO Peshawar wherein you were shown recommended for recruitment while the original list received from SSU (CPEC) wherein you were also not recommended by the CPO review Board. You recruit constable made fraud/deceived for recruitment as constable in the Police department. This act on his part indicates he intentionally collaboration & indulging with anybody else at CPO Peshawar to change in the list received from the CPO Peshawar for his ullerior motive. This speaks highly quite adverse on his part and shows his malafide intention, willful breach and malpractice in the discharge of his official obligations."

The enquiry Officers Mr. Salf ur Rehman, SDPO TN in accordance 1. with provision of the Police Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police Department may provide reasonable opportunity of hearing to the accused official, record his finding and make within 10-days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused.

The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

District Police arak /Enq, dated 07 Copy to:

1. The enquiry Officers for initiating proceeding against the accused under the Provision of the Police Oisciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27,08.2014) Govt: of Khyber Pakhtunkhwa, Police 2. Recruit Constable Jamai Rasool No. 4984 of FRP Strength.



از فرق سب ڈورٹن پولیس آفیسرسرکل تحت نصرتی۔ مین نمس 250850-0927

مور <u>قراه / 19 | 19</u>

i.

2.87 / PA/TN , in [1.3]

<u>: يانب:</u> جناب دُسرُك بوليس آ فركرك

منوان: فائزى ديور<u>ث</u>

بحواله چارج شیٹ احکام نمبر 90/Enq مور ند 02.06.2022 مجاربی جانب ڈسٹر کٹ پولیس آفیسر کرک برخلاف دیکروٹ کنسٹبل جمال رسول بلٹ نمبر 4984 (FRP Strength) زیرِ دیخطی کو مارک ہوکرزیرِ دیخطی نے انگوائیری کر کے جوذیل ہے۔ الزامات:

بحوالہ چارج شیٹ ہذامتذ کرہ بالا میں ریکر دٹ کسٹیل جمال رسول بلٹ نمبر 4984 (FRP Strength) الزام ہے کہ ندکورہ ریکروٹ کا الزام ہے کہ ندکورہ ریکروٹ ETEA کی سلیشن CPO پیٹا ور میرٹ لسٹ میں نہیں ہوئی تھی، بلکہ ندکورہ ریکروٹ کسٹیل نے CPO پیٹا ور میرٹ لسٹ میں نہوں ہوئی تھی، بلکہ ندکورہ ریکروٹ کسٹیل نے CPO پیٹا ور کی کیا ہے۔ بہتر میں المرق کو الحق کو بلو کو ب

ای طرح جناب DPO صاحب ضلع کرک دفترے مجاریہ آرڈ رکے مطابات نہ کورہ ریکر دٹ کنٹیبل جمال رسول کو بیریل نمبر 123 پر بلٹ نمبر 4984 الاٹ ہوکر محکمہ پولیس میں جائینگ کی ہے اور سوجودہ PTC ہنگا و میں عسکری ٹریننگ حاصل کر رہا ہے۔

دوران انکوائیری بعد پڑتال کے بیہ بات ساسے آئی ہے، کہ CPO سے موصول شدہ دو (2) میرٹ اسلیشن کسٹ جس پرایک ہی نمبر 14699-720/E-۱۷ مورجہ 29.12.2022 درج ہیں جس کے مطابق ایک کسٹ بیل کنٹیمل جمال رسول بلٹ نمبر 4984میریل نمبر 102 پر Reconnended اور دوسرے میں ای سریل نمبر پر Not Recommended ہے۔ (وواو ل میرٹ کسٹ انس انکوائیری ہے)

1º In

اندرین باره سابقه اکوائیری آفیسرصاحب نے بحوالہ لیونمبر 109/PA/TN مورخه 193/PA/TN مورخه 193/PA/TN مورخه 193/PA/TN مورخه 193/PA/TN مورخه 193/PA/TN مورخه 101.09.2022 مورخه 153/PA/TN مورخه 153/PA/TN مورخه 101.09.2022 مورخه المسلم أي المسلم الم

رائے انگوائری آفیسر۔

بعد پڑتال جملہ متعلقہ ریکارڈ موصول شدہ دفتر CPO پیثا در اور دفتر RPO کو ہائے کنسٹیبل جمال رسول Not Recommended ہے،۔۔فائنل رپورٹ بعرض مناسب تھم گز ارش ہے۔

المرور المرابي المراجة العرق سباد ويرثل يوليكي المراجمة العرق

Men -