


SA 626/2022


15<sup>th</sup> Feb. 2024 01. Mr. Yasir Saleem, Advocate for the appellant present.

Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

02. Vide our detailed judgment consisting of 07 pages, in connected service appeal No. 625/2022, titled "Zia-ur-Rehman Versus the Provincial Police Officer, Khyber Pakhtunkhwa and others", this appeal is allowed as prayed for. Cost shall follow the event. Consign.

03. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 15<sup>th</sup> day of February, 2024.*

  
(FAREEHA PAUL)  
Member (E)


  
(RASHIDA BANO)  
Member(J)

\*Fazal Subhan PS\*

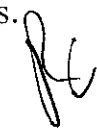
SCANNED  
KPST  
Peshawar

29.11.2023 1. Appellant in person present. Mr. Mohammad Jan learned District Attorney for the respondents present.

2. Appellant requested for adjournment on the ground that his counsel is busy before august Supreme Court of Pakistan. Absolute last chance is given to the appellant to argue the case on the next date failing which case will be decided on the basis of available record with the arguments. Adjourned. To come up for arguments on 15.02.2024 before D.B. P.P given to the parties.

  
(Muhammad Akbar Khan)  
Member (E)

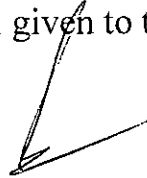
\*Kaleem Ullah

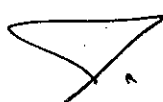
  
(Rashida Bano)  
Member (J)

12.05.2023

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant seeks adjournment on the ground that learned counsel for the appellant is indisposed. Adjourned. To come up for arguments on 03.08.2023 before the D.B. Parcha Peshi given to the parties.

  
(Muhammad Akbar Khan)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

\*Naeem Amin\*

03<sup>rd</sup> August, 2023

01. Counsel for the appellant present. Mr. Fazal Shah Mohmand, Addl. Advocate General for the respondents present.

02. Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Granted. To come up for arguments on 29.11.2023 before the D.B. Parcha Peshi given to the parties.

  
(FAREEHA PAUL)  
Member(E)

  
(RASHIDA BANO)  
Member (J)

\*Fazle Subhan, P.S\*

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T.S. K.P.S.T  
Peshawar

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T.S. K.P.S.T  
Peshawar

23.11.2022

Junior to counsel for the appellant present. Naseer Ud Din Shah learned Assistant Advocate General for respondents present.

Written reply on behalf of respondent not submitted. Learned AAG sought further time for submission of written reply. To come up for written reply/comments on 22.12.2022 before S.B.



(Rozina Rehman)  
Member (J)

22<sup>nd</sup> Dec, 2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl:AG for respondents present.

Written reply not submitted. Respondents are directed through learned AAG to submit written reply/comments on the next date positively. Last opportunity granted to them. To come up for written reply/comments on 07.02.2023 before S.B.



(Kalim Arshad Khan)  
Chairman

07.02.2023

Appellant present in person. Naseer Ud Din Shah, Learned Assistant Advocate General alongwith Muhammad Fayaz H.C for the respondents present.

Written reply on behalf of respondents submitted which is placed on file. To come up for rejoinder/arguments on 12.05.2023 before D.B.



(Rozina Rehman)  
Member (J)

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29<sup>th</sup> July 2022

Counsel for the appellant present and submits that the appellant was awarded major penalty of dismissal from service vide impugned order dated 29.12.2021, against which the appellant filed departmental appeal on 10.01.2022 but the same was also regretted vide order dated 30.03.2022. Learned counsel for the appellant further submits that neither any charge sheet was issued to the appellant nor any regular inquiry was conducted into the matter and thus the appellant was condemned unheard.

This appeal is thus admitted to full hearing subject to all just and legal objections by the other side. Appellant is directed to deposit security fee. Out district respondents be summoned through TCS, the expense of which be deposited by the appellant within three days, while the local respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 29.09.2022 before the S.B.

(Kalim Arshad Khan)  
Chairman

29.09.2022

Appellant in person present. Mr. Naseer-ud-Din Shah, Assistant Advocate General alongwith Mr. Fayyaz H.C for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned Assistant Advocate General seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up reply/comments on 23.11.2022 before S.B.

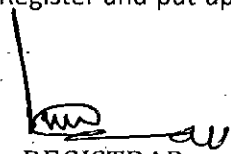


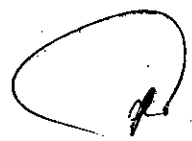
(Mian Muhammad)  
Member (E)

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ .626/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/04/2022	<p>The appeal of Mr. Muhammad Abbas presented today by Mr. Yasir Salim Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>06.05.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>On account of public holiday to come up for the same as before on 9/6/22</i></p> <p style="text-align: right;"> Rozina</p> <p>09.06.2022</p> <p>Junior to counsel for the appellant present.</p> <p>Lawyers are on general strike, therefore, case is adjourned. To come up for preliminary hearing on 29.07.2022 before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

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*Noted  
J 27/4*

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Muhammad Abbas vs Court of KPDK

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Yasir Saleem  
 Signature: [Signature]  
 Dated: \_\_\_\_\_

BEFORE THE KHYBER PUKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR

Service Appeal No. 626 /2022

SCANNED  
KPST  
Peshawar

Muhammad Abbas, Ex-Constable 1145 Police Lines Nowshera

.....APPELLANT

V/S

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

.....RESPONDENTS

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S.No	Description of Documents	Annex	Pages
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4.	Copy of the final merit list	B	8-13
5.	Copies of Naqal Madh & daily Tehsilwise Deployment at polling stations	C	14-23
6.	Copy of letter dated 10.12.2021	D	24
7.	Copies of statements and facts findings inquiry report dated 24.12.2021	E & F	25-28
8.	Copy of final show cause notice	G	29
9.	Copies of reply to Show Cause Notice dated 03.01.2022, its receipt and dismissal order dated 29.12.2021	H & I	30-33
10.	Copy of departmental appeal dated 10.01.2022 & order dated 30.03.2022	J & K	34-39
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Through: Appellant

*Yasir Saleem*  
Yasir Saleem  
Advocate High Court,  
Peshawar



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BEFORE THE KHYBER PUKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR

Khyber Pakhtukhwa  
Service Tribunal

Service Appeal No. 626 /2022

Diary No. 619

Dated 26/4/2022

Muhammad Abbas, Ex-Constable 1145 Police Lines Nowshera

.....APPELLANT

V/S

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

.....RESPONDENTS

SERVICE APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974,  
AGAINST THE IMPUGNED ORDER DATED 29.12.2021,  
WHEREBY THE APPELLANT HAS BEEN AWARDED THE  
MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE  
AGAINST WHICH HIS DEPARTMENTAL APPEAL DATED  
10.01.2022 HAS ALSO BEEN REGRETTEED VIDE OFFICE  
ORDER DATED 30.03.2022.

PRAYER:

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

Respectfully Sheweth.

FACTS:

1. That various posts of police constable BPS-7 has been advertised which are also uploaded on ETEA website seeking applications from desirous candidates wherein last date of submission of application was shown as 30.09.2020. *(Copy of the advertisement is attached as annexure A).*

**Filed to-day**  
**Registrar**  
*26/4/2022*

2. That the appellant having qualification of Intermediate, duly applied for the post so advertised through online application thereafter roll number was issued to the appellant which was conducted by educational testing and evaluation agency (ETEA) Peshawar. The appellant duly appeared in the test and fortunately qualified the test and undergone the physical test and was successful in physical test also.

2

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

(3)

GROUNDS OF SERVICE APPEAL

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

(4)

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

(5)

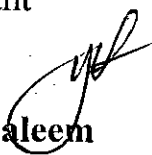
O. That the appellant seek permission to advance other grounds and proofs at the time of hearing.

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

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

  
Appellant

Through:

  
Yasir Saleem  
Advocate High Court,  
Peshawar

**Certificate:-**

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

  
ADVOCATE.

**AFFIDAVIT**

I, **Muhammad Abbas**, Ex-Constable 1145 Police Lines Nowshera, do hereby solemnly affirm and declare on oath that contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



  
DEPONENT

## اشتبہار برائے بھرتی پولیس کانسٹیبلان محکمہ پولیس خیبر پختونخوا

محکمہ پولیس خیبر پختونخوا کو پولیس کانسٹیبل (BPS-07) کی متعدد آسامیوں پر بھرتی کے لیے صوبہ خیبر پختونخوا کے مستقل حکومتی افراد (شمول ضم شدہ قبائلی اضلاع) سے بذریعہ خیبر پختونخوا ایجوکیشنل ٹیسٹنگ اینڈ ایلولویشن ایجنسی (ETEA) درخواستیں مطلوب ہیں۔ خواہشمند سوزوں امیدواران جو درج ذیل شرائط پر پورا اترتے ہوں کو بذریعہ اشتہار مطلع کیا جاتا ہے کہ۔

(a) اپنی درخواستیں نیچے دیے گئے طریقہ کار کے مطابق آن لائن [www.etea.edu.pk](http://www.etea.edu.pk) پر مورخہ 11 ستمبر 2020 سے 30 ستمبر 2020 تک جمع کرائیں۔

(b) متردد تاریخ کے بعد آن لائن درخواست جمع نہیں کرانی جائے گی۔

### شرائط بھرتی:

- (1) تعلیم: میٹرک پاس (2) عمر: 18 تا 25 سال (عمر کا حد مورخہ 31 ستمبر 2019 کو 25 سال سے زیادہ ہو جبکہ 30 ستمبر 2020 کو 18 سال سے کم نہ ہوں۔)
- (3) قد: 5 فٹ 7 انچ (امیدواروں کے لیے) اور 5 فٹ ایک انچ (خواتین امیدواروں کے لیے) (4) چھائی:  $33 \times 34 \frac{1}{2}$  (صرف مردوں کے لیے)
- (5) ڈویژن: صرف خیبر پختونخوا کے متعلقہ اضلاع (شمول ضم شدہ قبائلی اضلاع) علاقہ جات۔
- (6) جسمانی نیت: 07 منٹ میں ایک منٹ دوڑ (مردوں کے لیے) اور 07 منٹ میں ایک کلو میٹر دوڑ (خواتین کے لیے) پاس کرنا لازمی ہے۔
- (7) جسمانی امتحانات مندرجہ ذیل شہروں میں ہونگے۔

- (ii) پشاور (iii) مردان (iii) دیر لورک (iv) بنگور (v) چترال (vi) کوہاٹ (vii) بنوں (viii) ڈیرہ اسماعیل خان (ix) لیٹ آباد (x) مانسہرہ (نوٹ: سینٹر کی تبدیلی کے لیے کوئی درخواست زیر غور نہیں لائی جائے گی)
- (8) تحریری ٹیسٹ: جسمانی نیت میں کامیاب امیدواروں (جن امیدواروں نے جسمانی پیمانہ اور دوڑ کو ایفائی کیا ہو) کو تحریری امتحان کے لیے مقررہ اضلاع میں پیش ہونا ہوگا۔ (تفصیلات ویب سائٹ پر موجود ہونگی نیز کامیاب امیدواروں کو بذریعہ SMS بھی اطلاع دی جائے گی۔) تحریری ٹیسٹ میٹرک لیول کے انگلش، اردو، اسلامیات (لکس برائے غیر مسلم)، پاک سنڈی اور جنرل ایجنس میں لیا جائے گا۔

- (9) انسانی نمبر: تمام طرز کے مندرجہ بالا امتحانات میں کامیاب امیدواروں کا میٹر ہوتے وقت انسانی نمبرات مندرجہ ذیل فارمولے کے مطابق دینے پائیں گے۔  
(الف) انٹرمیڈیٹ: 02 نمبر (ب) پیپر ڈگری بولڈرز: 01 نمبر (ج) ماسٹر ڈگری بولڈرز: 01 نمبر (نوٹ: انسانی نمبر 04 سے زیادہ نہیں ہونگے۔)
- نوٹ: 1- عکاسی پالیسی کے مطابق عمر، قد، چھائی اور تقسیم میں کوئی رعایت نہیں دی جائے گی۔ لہذا متعلقہ معیار پر پورا نہ اترنے والے امیدواروں کی درخواستیں منظور نہیں کی جائیں گی۔

- 2- خیبر پختونخوا کے اضلاع سوات، بونیر، شانگلہ، دیر لورک، دیر اپ، چترال، کوہستان، تورغر اور نئے ضم شدہ اضلاع کے امیدواروں کو گورنمنٹ کی طرف سے دی گئی (03) سال زائد عمر میں رعایت دی جائے گی۔

- 3- دس (10) فیصد خواتین، دس (10) فیصد پولیس ملازمین کے بچوں اور پانچ (05) فیصد کوئٹہ ایجنسی برادری کے لیے مختص ہوگا۔

### درخواست دینے کا طریقہ کار:

آن لائن درخواست فارم مورخہ 11 ستمبر 2020 سے [www.etea.edu.pk](http://www.etea.edu.pk) پر موجود ہوگا۔ امیدوار اپنی درخواستیں آن لائن مورخہ 11 ستمبر 2020 سے 30 ستمبر 2020 تک [www.etea.edu.pk](http://www.etea.edu.pk) پر جمع کرائیں۔ کامیاب آن لائن درخواست جمع کرنے کے بعد یو ٹائیٹڈ بینک لیونڈ UBL کی ڈیپازٹ سٹیپ (سج ٹو کن نمبر) ذہن لوڈ اپرنٹ کر کے کسی بھی IUBL OMNI ایجنٹ کے پاس جا کر سٹیٹن 650 روپے (امتحانی فیس) کا قابل واپسی) نیوز ڈیپازٹ سٹیپ پر جمع کرائیں، دوسری اشیا آپ کو OMNI کی طرف سے PAYMENT کا تصدیقی SMS بھی موصول ہوگا۔ فیس جمع

کرنے کے بعد اصل ڈیپازٹ سلف Candidate Copy اپنے پاس محفوظ رکھیں کیونکہ بینک ڈیپازٹ سلف اور رول نمبر سلف کے بغیر امتحان میں بیٹھنے کی اجازت نہیں دی جائیگی۔ برائے مہربانی تعلیمی دستاویزات / اسناد اپنا آئٹم بھیجنے کی زحمت نہ کریں۔ ETEA یا محکمہ پولیس کو اگر شارٹ لسٹ امیدواروں کی تعلیمی اسناد کی ضرورت محسوس ہوئی تو ایسی صورت میں تعلیمی اسناد کی تصدیق شدہ منتول تمام طرز کے ٹیسٹ پاس کرنے کے بعد جمع کرانا ہوگی، جس کے لیے امیدواروں کو بذریعہ ایسا SMS اطلاع دی جائیگی۔

امیدواروں کو جسمانی و تحریری ٹیسٹ کارول نمبر سلف ڈاؤن لوڈ اپرٹ کرنے کے لیے SMS کے ذریعے اطلاع دی جائے گی نیز یہ معلومات اپنا کی ویب سائٹ پر بھی دی جائیں گی۔ جسمانی پیمائش و دوڑ کی تاریخ اور ٹیسٹ سنٹر رول نمبر سلف میں درج ہوگا۔ یاد رکھیں کہ اپنا جسمانی و تحریری امتحان کے لیے رول نمبر سلف کسی بھی امیدوار کو بذریعہ ڈاک ارسال نہیں کرے گا۔ اگر آپ نے اپنے ہم کانسٹنٹ درکن تبدیل کیا ہو یا اپنے موبائل پر آپ نے پروفیشنل سیکرٹری بلاک کیے ہوں تو آپ کو اپنا کی طرف سے کوئی SMS موصول نہیں ہوگا۔ لہذا آن لائن فارم میں صرف ایسا ہی موبائل نمبر درج کریں جس کا ٹیسٹ درکن تبدیل نہ کیا گیا ہو۔ اس کے علاوہ اگر آپ کو موبائل سلسلہ تین (03) گھنٹے بند ہوا یا آپ سلسلہ تین (03) گھنٹے نیٹ ورک سے باہر ہوئے اور اس دوران اپنا کی طرف سے آپ کو SMS بھیجا گیا تو وہ SMS تین (03) گھنٹے تک نیٹ ورک میں رہنے کے بعد خود کار نظام کے ذریعے ختم (EXPIRE) ہو جائیگا یعنی ایسی صورت میں بھی آپ کو SMS موصول نہیں ہوگا۔

نوٹ: آن لائن درخواست جمع کرنے کے لیے درخواست گزار اپنے تعلیمی و دیگر کوائف اور Recent Scanned Passport size Picture (پاسپورٹ سائز نئی تصویر کی سائٹ کا پانی) ضرور اپنے ساتھ رکھیں۔ مجوزہ تصاویر ہر سرٹے کی نشان انگشت کی تصدیق کرے گی۔ یعنی ہر امتحانی سرٹے پر امیدوار کا نشان انگشت بائیو میٹرک مشین کے ذریعے لیکن لیا جائے گا۔ تمام طرز کے مندرجہ بالا امتحانات میں کامیاب امیدواروں کو فائنل بائیو میٹرک تصدیق اور کوالٹی چیک (جسمانی چیک) کے لیے پشاور لازمی آنا ہوگا۔ نشان انگشت کی تصدیق اور کوالٹی جسمانی امتحان میں نفل ہونے کی صورت میں آپ کسی بھی سرٹے پر نا اہل قرار دیے جائیں گے۔ جبکہ تمام طرز کے امتحانات اور کوالٹی جسمانی امتحان پاس کرنے کے بعد محکمہ پولیس ایک مرتبہ پھر آپ کا جسمانی پیمائش اور اتر و پورا Psychological Test کرے گا جس میں نفل ہونے کی صورت میں بھی آپ فائنل تصدیق کیے جائیں گے۔ (یعنی اپنا کی طرف سے کی گئی پیمائش فارم میں تصور ہوگی اور جسمانی پیمائش و سلیکشن کا فائنل اختیار محکمہ پولیس کے پاس ہوگا۔) امتحانی مرکز میں موبائل فون لانے کی اجازت نہیں ہے۔ جسمانی اور تحریری امتحان کی تاریخوں کے بارے میں اور رول نمبر سلف ڈاؤن لوڈ اپرٹ کرنے کے لیے ETEA SMS کے ذریعے اطلاع دی جائیگی۔ جعلی دستاویزات کی صورت میں تفریق کارروائی کے علاوہ محکمہ پولیس میں کسی بھی نوکری کے لیے نا اہل کیا جائیگا۔ جبکہ غلط معلومات فراہم کرنے والا امیدوار کسی بھی سرٹے پر نا اہل تصور ہوگا۔ کامیاب امیدواران پولیس کے کسی بھی یونٹ / ضلع میں تعینات کیے جائیں گے۔

آن لائن درخواستیں (مجموع 650 روپے امتحانی فیس) جمع کرانے کی آخری تاریخ 30 ستمبر 2020 ہے۔

مزید معلومات کے لیے: [www.etea.edu.pk](http://www.etea.edu.pk) فونن نمبر: 9219078 - 091-9219049

نشانی

ڈپٹی ڈائریکٹر ایڈمن۔ خیبر پختونخوا ایجوکیشنل ٹیسٹنگ اینڈ ایولوشن ایجنسی (ETE)۔ پشاور

منجانب: اے آئی جی اسٹیبلشمنٹ، خیبر پختونخوا پولیس۔ پشاور

## POLICE DEPARTMENT

## DISTRICT NOWSHERA

## LIST OF CANDIDATES FOR RECRUITMENT AS CONSTABLE 2021 THROUGH ETEA

S#	Roll No.	Name	Father Name	Residence	Police Station	CNIC No.	Edu:	Test Marks	Date of Birth	Height	Chest	Contact No.
1	64877	Junaid Khan	Gul Zaman	Moh: Mardan Khel zando Banda Che	Risalpur	1720142079361	BA	77	05.01.1999	5-8 ½	33x35	0316-9917533
2	64743	Tauqeer Ullah	Naseem Ullah	Azakhel Bala	Azakhel	1720173717947	FA	72	03.02.1996	5-9	33x34 ½	0341-9879051
3	62616	Syed Noor	Mir Afzal Khan	Behram Kalay	Risalpur	1720126199687	FA	70	20.03.2000	5-8	33x35	0344-9075631
4	62157	Muhammad Adil	Munawar Khan	Moh: Sheikh Shahbaz Baba Khesghi Payan	NSR Kalan	1720160100127	FA	69	16.04.1996	5-7 ½	35x36 ½	0312-1992032
5	60293	Hamid Kamal	Noor Ali	Moh: Andar Khel Dagbesod	Pabbi	1720203702859	BA	69	14.04.1997	5-11	34x36	0311-9420912
6	66300	Arif Khan	Fazal Ur Rahman	Chirat Road Panah Kot	Jalozai	1610281341101	FA	68	20.03.2000	5-7 ½	33x35	0316-1237377
7	65366	Muhammad Abbas	Inam Ali	Rahim Ullah Korona Khesghi Bala	NSR Kalan	1720105492443	FA	68	07.07.2001	5-7 ½	34x36	0313-1950408
8	65368	Muhammad Abid	Inam Ali	Rahim Ullah Korona Khesghi Bala	NSR Kalan	1720103598981	FA	66	01.01.1998	5-8 ½	38x39 ½	0342-5988242
9	65369	Zia Ur Rahman	Inam Ali	Rahim Ullah Korona Khesghi Bala	NSR Kalan	1720159918463	FA	66	14.03.2000	5-11	34x35 ½	0312-9301756
10	62754	Imad Hussain	Inzar Shah	Sultan Abad Sheikhan	Jalozai	1720150300013	FA	66	04.04.2001	5-10	33x34 ½	0313-9171987
11	61303	Umair Khan	Arshad Khan	Garhi Momin	Akbarpura	1720154659095	FA	66	01.09.2002	6-0 ½	33x35	0318-9174440
12	63922	Khan Muhammad	Muhammad Karim	Moh: Batak Zai Khesghi Bala	NSR Kalan	1720119858903	10 <sup>th</sup>	64	02.02.1998	5-8 ½	33x35	0336-5178144
13	65390	Hawa Hayt	Fazal Hayat	Khesghi Payan	NSR Kalan	1720189135309	FA	64	10.02.2001	5-8 ½	35x37	0312-5331516
14	63766	Muhammad Sulaiman	Niaz Ali Khan	Gharib Abad Khesghi Payan	NSR Kalan	1720133346767	FA	64	25.04.2002	6-1 ½	33x34 ½	0311-5876975
15	62867	Najeeb Ur Rahman	Habib Ur Rahman	Akora Khattak	Akora	1720303511197	FA	64	05.08.2002	5-10	33x35	0320-9901601
16	62949	Osama Hassan	Shah Zamin	Bara Khel Mera Risalpur	Risalpur	1720167751869	FA	63	05.08.1999	5-8 ½	33x34 ½	0340-3927572
17	65615	Usama Ali Shah	Gohar Ali Shah	Moh: Aba Khel NSR Kalan	NSR Kalan	1720184546031	FA	63	25.02.2001	5-7 ½	35 ½ x37	0300-5776323
18	64663	Sulaiman Khan	Rawail Shah	Banda Sheikh Ismail	Akbarpura	1720174436725	FA	63	11.04.2001	5-7	33x34 ½	0317-1967612
19	66102	Muhammad Junaid Khan	Asif Ali Khan	Moh: Talab Dagbesod	Pabbi	1720151570083	BS	62	31.03.1996	5-9 ½	35x37	0312-6989856
20	63924	Muhammad Ibrahim	Samin Jan	Moh: Batak Zai Khesghi Bala	NSR Kalan	1720159140887	FA	62	01.01.1999	5-7 ½	33x35	0311-9084990
21	63330	Adil Khan	Jangraiz Khan	Moh: Tordher Rashakai	Risalpur	1720123612665	FA	62	01.02.1999	5-10	38 ½ x40	0348-9242438
22	66162	Bilal Khan	Shah Navaz Khan	Shpano Kalay	Risalpur	1720140355413	10 <sup>th</sup>	62	16.02.1999	5-10	37 ½ x39	0347-9692750
23	65630	Riwayat Khan	Pordil Khan	Khesghi Payan	NSR Kalan	1720181665399	10 <sup>th</sup>	61	09.03.1996	5-10	33x35	0314-9191943
24	64011	Muhammad Usama	Gohar Ali	Khan Sher Garhi	Pabbi	1720189684967	FA	61	20.10.1997	5-9	35 ½ x37	0335-5301903

Contact No

36	0308-9480276
35	0331-5131875
39	0308-5563872
32	0346-0150267
31	0313-5191500
35 ½	0347-2606338
35	0348-8056952
36	0313-6014325
37	0333-9880351
3 ½	0313-9596467
37	0315-5548159
3 ½	0316-7507220
3 ½	0313-0406511
35	0346-7856936
35	0340-6984282
36	0341-5317235
38	0308-9188241
36	0347-9252526
40	0340-1893018
36	0341-4344918
35	0344-9858324
36	0314-9186911
4 ½	0348-1900694
5 ½	0313-6954956
40	0315-1942612
37	0347-2929168



S#	Roll No.	Name	Father Name	Residence	Police Station	CNIC No.	Edu:	Test Marks	Date of Birth	Height	Chest	Contact No.
133.	65842	Hazrat Ullah	Azmat Khan	Pabbi Station	Pabbi	1720204289739	FA	47	04.08.2001	5-7 ¼	33x35	0336-1961722
134.	60391	Malik Sheryar	Malik Arshad	<b>Not Verified</b>								
135.	60427	Muhib Ullah	Fazand Ali	Rokhan Abad Khesghi Payan	NSR Kalan	1720154314481	10 <sup>th</sup>	47	02.08.2002	5-9	35x37	0314-9134933
136.	66207	Muhammad Duad Tareen	Muhammad Fayaz	Moh: Muhammad Haicem Khesghi Bala	NSR Kalan	1720183085733	FA	47	10.09.2002	5-10 ¼	33x35	0316-1906754
<b>Police Sons Quota</b>												
137.	62593	Taseer Zafar	Zafar Ali	Moh: Metha Khel Khesghi Bala	NSR Kalan	1720197713187	FA	67	30.03.1996	5-11	39x41	0301-5667171
138.	62221	Zeeshan BadShah	Inayat Ur Rahman	Baba Ji Kalay	Risalpur	1720122800697	FA	63	15.02.1997	5-8	36x38	0349-9161885
139.	60303	Muhammad Yasir	Muhammad Azam	Charpani	Nizampur	1720185771389	BA	56	07.01.1996	5-7	38x39 ½	0313-9070677
140.	03393	Muhammad Siyah	Mursaleen	Daghesod	Pabbi	1720203910591	FA	51		6-1	33x35 ½	0314-189365
141.	64648	Muhammad Ibraheem	Fazal Rabi	Baba Ji Kalay	Risalpur	17201-98840017	BA	48	01.08.1998	5-7	34x35 ½	0347-8126588
142.	60637	Asim Zia	Zia Uddin	Moh: Behram Khan Khel	NSR Kalan	1720130195331	FA	48	05.03.1999	5-8	38x40	0311-5530756
143.	61492	Muqaddar	Gulam Razaq	Garhi Momin	Akbarpura	1720159151269	FA	48	01.01.2002	5-9 ¼	34x36	0300-5980184
144.	61289	Syed Ahmad Ali Shah	Kiramat Shah	Bashir Abad Akbarpura	Akbarpura	1720191791205	FA	47	23.03.1998	5-7 ¼	33x35	0304-8457849
145.	61469	Muhammad Farhan	Farman Shah	Azeem Abad Khesghi Payan	NSR Kalan	1720194827219	FA	47	28.08.2002	5-9	34x36	0333-9034853
146.	64985	Muhammad Faizal Khan	Shad Muhammad Khan	Taru Jaba	Pabbi	1720181076051	10 <sup>th</sup>	46	24.04.1997	5-7	34x36	0308-5936403
147.	62371	Fawad Hussain	Hussain Khan	Khesghi Payan	NSR Kalan	1720144082941	FA	46	21.12.2000	5-7	34x36	0336-9397987
148.	62780	Abdullah	Salih Muhammad	Khesghi Payan	NSR Kalan	1720180714171	FA	46	25.01.2001	5-9	35x37	0312-9231398
149.	63033	Bilal Khan	Amir Bashar Khan	Ali Baig	Pabbi	1720139030051	FA	45	15.05.1997	5-11	36x38	0315-7707055
150.	66008	Zohaib Hadi	Fazle Hadi	Taru Jaba	Pabbi	1720203939913	10 <sup>th</sup>	44	17.08.1998	6-2	39x40 ½	0315-9785658
151.	63815	Muhammad Sadeeq	Javed Iqbal	Baba Ji Kalay	Risalpur	1720186566709	FA	44	22.03.2001	6-0	38x40	0347-1366743
152.	63808	Shehnam Khan	Ghaffar Ali Khan	Lai Khel Khesghi Bala	NSR Kalan	1720109655657	10 <sup>th</sup>	42	25.03.1998	5-7 ¼	35x37	0318-0400624
<b>Female Candidates</b>												
153.	60014	Umal Khair (Female)	Faiz Ali	Moh: Payan Pir Sabaq	NSR Kalan	4220176950252	BA	60	01.04.1999	5-1 ½	-	0333-3318416
154.	60051	Zaib Un Nisa (Female)	Muhammad Ishaq	Balu	Akbarpura	1720206495622	FA	49	10.12.1999	5-1 ¼	-	0346-9218011
155.	60070	Sania Shah (Female)	Sahib Shah	Rahmat Abad Khat Kalay	Azakhel	1720172594872	FA	44	15.01.1998	5-3	-	0333-9217573

Enter your Roll No here

Search

Result Date: 01/Oct/2021

ROLL NO.	65366
NAME	MUHAMMAD ABBAS
FATHER_NAME	INAM ALI
DOMICILE	NOWSHERA
PAPER-A MARKS/ 80	54
PAPER-B MARKS/ 20	12
TOTAL MARKS/ 100	66
REMARKS	PASSED

Errors and Omissions are accepted with-in 05 days of  
the declaration of Result

یو این ڈیوسن نو سپرہ

$$\frac{09 \frac{12}{21}}{21} = x =$$

سید محمد خان صاحب 12:00 09 12 21

دستور مسمیٰ محمد عباس علیہ الرحمہ (ادخا) علی

علاؤ اللہ کرور و بی بی بالا محمد یونس میں منظور شدہ قسٹ

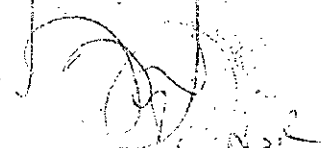
کمری پور ٹیلیگرافی نمبر 1145 الٹ ڈیوٹی ڈائری

سنگھ پور ڈیپارٹمنٹ کے قسٹوں کی علیحدہ علیحدہ کاپیاں

مندرجہ کارڈوں کی منسلک دستاویز ارسال کی جائے گی

مختار

آؤ علی محمد



12-09-21

15

MEDICAL CERTIFICATE

Name of Official Muhammad Abbas

Caste or race Pathan

Father's Name Inam Ali

Residence Rahim Ullah Korona Khesghi Bala

Date of Birth 07.07.2001

Exact height by measurement 5 - 7 3/4

Personal mark of identification \_\_\_\_\_

Signature of the Official \_\_\_\_\_

Seal of Officer \_\_\_\_\_

I do hereby certify that I have examined Mr. \_\_\_\_\_  
a candidate for employment in the Office of the \_\_\_\_\_  
and cannot discover that he had any disease communicable or other constitutional  
affection or bodily infirmity except \_\_\_\_\_

I do not consider this as disqualification for employment in the office of the  
\_\_\_\_\_ His age according to his own statement \_\_\_\_\_  
year and by appearance about \_\_\_\_\_ /years.

Medical Superintendent,  
DHQ, Hospital Nowshera

Left Hand Thumb and Finger

Impression \_\_\_\_\_

16

C/3

POLICE DEPARTMENT

NOWSHERA DISTRICT



**CONTINGENCY PLAN**  
**FOR**  
**LOCAL BODIES- ELECTIONS-2021**

(17)

2

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**LOCAL BODY ELECTION-2021 (Over All Statistics)**

**POLICE DEPARTMENT**

**DISTRICT NOWSEHRA**

1 No. of VCs 153	2 No. of Voters		3 No. of Polling Stations				4 No. of Polling Booths			
	Male	Female	Total	Male	Female	Combined	Total	Male	Female	Total
	446966	371607	818573	263	225	70	558	1030	908	1938

TOTAL NO. SEATS IN DISTRICT NOWSHERA					
1 Tehsil 03	2 General	3 Kissan	4 Youth	5 Women	6 Minority
	459	153	153	153	153

CATEGORISATION OF POLLING STATIONS											
1 Most Sensitive				2 Sensitive				3 Normal			
Male	Female	Combined	Total	Male	Female	Combined	Total	Male	Female	Combined	Total
33	16	9	58	60	58	30	148	170	151	31	352

DEPLOYED STRENGTH (AT POLLING STATIONS)											
1 Most Sensitive				2 Sensitive				3 Normal			
Male	Female	Combined	Total	Male	Female	Combined	Total	Male	Female	Combined	Total
1xASI 1xHC 10xFCs	1xASI 1xHC 10xFCs 2xLFCs	1xASI 1xHC 10xFCs 2xLFCs	746	1xHC 3xFCs	1xHC 3xFCs 1xLFC	1xHC 3xFCs 1xLFC	680	1xHC 2xFCs	1xHC 2xFCs 1xLFC	1xHC 2xFCs 1xLFC	1236

**Mohafiz / QRF / APC**

Mohafiz	QRF	APC	Total Strength
No.1 Mobile – 1x 3	No.1 Cantt Circle 1x 3	No.1 Cantt Circle 1x 3	Inspector -03
No.2 Mobile – 1x 3	No. 2 Pabbi Circle 1x 3	No. 2 Pabbi Circle 1x 3	Sis - 02
2 x SI – 6x FCs	No.3 Akora Circle 1x 3	No.3 Akora Circle 1x 3	HCs- 03
	3 x Insp. 9 x FCs	3 x HCs. 9 x FCs	FCs- 24

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**1. INFORMATION**

As per Provincial Election Commissioner, Khyber Pakhtunkhwa Notification No. F.16 (1) 2021-LGE-KP dated 04.11.2021 received from Regional Police Officer, Mardan vide diary No. 6506-15/ES, dated 15.11.2021 that Local Government - Elections at district Nowshera is scheduled to be held on 19.12.2021. In order to hold the Election process in peaceful atmosphere, the following security arrangements are hereby ordered:

**AIM OF THE PLAN**

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

**OBJECTIVES**

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

**METHOD**

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

- a. Collect, collate and disseminate intelligence in advance with regard to any attempt or execute the threats.
- b. Surveillance over all political, sectarian, religious leaders and students/labor community, so that in case of any breach of peace, their pre-emptive arrest can be secured without any hurdle/obstacle.
- c. Deployment of Police and other Law Enforcing Agencies at the Polling Stations to be made according to the formula and instructions issued by CPO.
- d. Concentration of Reserve Toops at appropriate places to frustrate away any threat to law & order/security.



**PHASES**

In order to accomplish these objectives, the Contingency Plan will run through the following three phases:-

**PHASE-I**

**PRE-ELECTION CAMPAIGN**

Although this phase has already been set in, but its intensity will gain momentum till its peak on election eve?

**PHASE-II**

**ELECTION DAY 19<sup>th</sup>, December 2021**

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

**PHASE-III**

**POST ELECTION SCENARIO**

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

**PHASE-I**

**PRE ELECTION CAMPAIGN**

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

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

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

a. **DUTIES RELATING TO ELECTIONEERING PROCESS**

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

- i. Briefed about their duties.
- ii. Fully equipped for the duty.
- iii. Trained to exercise, restrain and restore normalcy whenever called into action.

It shall be the foremost duty to warn/admonish the candidates responsible for the mudslinging and provoke their workers to indulge in disruptive activities. In case, these bickering continue and there is an imminent danger to peace and tranquility, legal action must be taken in consultation with Deputy Commissioner, Nowshera.

b. **CODE OF CONDUCT**

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

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

c. **BAN ON CARRIAGE OF ARMS/EXPLOSIVE**

Ban-on the carriage of Arms be strictly executed.

d. **REMOVAL OF WALL PAINTING/CHALKING**

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

e. **LAW & ORDER DUTIES**

**RESERVES**

- i. RRF & Elite should be standing reserves to meet any law & order situation in the Urban limits of the district.
- ii. In case of any greater requirement, adjustment will be made accordingly. All Reserves will be equipped with anti-riot gear and 1-3 armed personnel.

f. **DAILY REQUIREMENT:**

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

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

ERA

Mr. Bilal Ahmad, ASP Cantt Circle (03314874682) assisted by Insp Shahjee Hussain ASDPO Cantt &  
HO PS Cantt (0313-9595966)  
SHO PS Kalan (0340-9022800)  
SHO PS Risalpur (0344-9201520)

Station	Police Station	Category	Name of Incharge	Police Strength	LHWs Strength	Education Department	Presiding Officer
Pol No.1 e)	Azakhel	Normal	LHC Anwar Mehmood No.1304 Inv: Azakhel 0345-5008484	1.FC Junaid Khan No.412 Police Lines 0316-9917533		Jamdad Khan Chowkidar 0316- 861458	MAJID SHEHZAD LECTURER GPGC NSR 03369064740
Pol lined)	Azakhel	Sensitive	PASI Azfar Alam No.977M EPTC	1.FC Sana Ullah No.1602 PS Azakhel 0300-3527696 2.LHC Saeed No.1111 PS Azakhel 0344-5817052 3.LFC Basmin No.167 Police Lines		Rukhsar ali shah Chowkidar 0343- 1963363	RUKHSANA NAZ ASST PROFESSOR GGDC PIRAI 3078305744
Azakhel	Azakhel	Sensitive	HC Khadim Hussain No.1034 Inv: Pabbi 0313-8887682	1.FC Tanveer No.1728 CDL 0302-8887380 2.FC Saeed Rauf No.169 EPTC		Ubaid Ullah Chowkidar 0343-6016275	Ejaz Ahmad SST-Sc GHS Azakhel Bala 0300 5945218
Azakhel e)	Azakhel	Sensitive	PASI Muhammad Musa No.695 EPTC	1.FC Abdur Rauf No.1599 CDL 0331-5049437 2. LHC Astaghfirullah No.1388 PP Ajab Bagh 0332-0523733 3.LFC Rahat Jehan No.156 Police Lines		Tayyab Shah Chowkidar GGHSS Azakhel Bala Mamrez Chowkidar 0345-1910179	SHAHNAZ GUL SS CHEMISTRY GGHSS AZA KHEL BALA, NOWSHERA 03369538925
Pol No.3 el Bala	Azakhel	Sensitive	LHC Farhad Ali No.688 Police Lines 0302-5752959	1.FC Nabi Ullah No.1151 Pay Branch 0346-5649051 2.FC Akbar Zaman No.194 EPTC	LHW Naseem Begum 0348- 1951235	Masaud Khan Chowkidar 03429424566	Razi ur Rehman SST-Sc GHS Azakhel Bala 0347 9290256
Pol No. 2	Azakhel	Sensitive	HC Hamid Ali No.574 Inv: 0313-9370422	1.FC Gul Sair No.1907 PS Azakhel 0331-9074114 2.FC Wafi Ahmad No.93 EPTC		Fazal Rabi Chowkidar 0336-9363142	0311 6698980 /0333 9178670
School khel Bala	Azakhel	Sensitive	LHC Muhammad Ali No.1215 DFC 0334-6050885	1.FC Ata Ullah No.1562 PS Azakhel 0315-1993895 2.FC Muhammad Afaq No.5363 EPTC 3.PASI Kainat No.857 Police Lines		Iftikhar Ahmad Chowkidar 0345- 9293450	SADIA KIRAN ASST PROFESSOR GGDC PIRPAI 033392657350
School khel Bala	Azakhel	Sensitive	LHC Saleem Javed No.407 DFC 0347-5660490	1.FC Zeeshan No.1561 PS Azakhel 0335-0936460 2.FC Zuhaib Khan No.3106 EPTC	Afia Begum Population 0345- 766667	Malak Faisal Chowkidar 0349-5190112	SHEEMA MUMTAZ KAKA KHEL SST BIO-CHEMISTRY (GGHSS AZA KHEL PAYAN, NOWSHERA 0333-9132804

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School 2 el Bala	Azakhel	Most Sensitive	SI Muntazir Khan Oil PS Azakhel (0345-9703993)	1.FC Itaf No.1940 PS Azakhel 0333-6746591 2.FC Said Ali Shah No.322 PS Azakhel 0334-5478764 3.LFC Shumaila No.597 PS Azakhel 4.Muhammad Hafeez Civil Defense 0321-9758896 5.Muhammad Rizwan Civil Defense	LHW Sakila Naz 0313-9788409		KAMRAN ALI SHAH SS GHSS NSR KALAN 03009049659
School (Male)	Azakhel	Sensitive	HC Ijaz No.1286 Naib Court 0334-8908614	1.FC Afzal Shah No.627 PS Azakhel 0314-9033612 2.FC Adil Shah No.162 EPTC		Hayat Ullah Chowkidar 0310-2122538	Irfan Ullah V/P GHSS Pir Piai, Nowshera 0346-9009844
el Payan	Azakhel	Normal	LHC Sohail No.210 Traffic Staff 0346-1959099	1.FC Sayed Noor No.102 Police Lines 0345-7707093	LHW Shesh Begum 0316- 1936759	Faid Chowkidar 0314- 5514124	TOHEED BEGUM. DPE (BPS-17) GHSS AZA KHEL BALA, NOWSHERA 0311-9943605
Aza Khel	Azakhel	Normal	LHC Shah Nawaz No.725 Inv: 0301-5926757	1.FC Muhammad Adil No.140 Police Lines 0312-1992032	LHW Faiza BHU Badrashi	Zulfiqar Chowkidar 0344-9136056	NADIA MAJEED SST (MATHS-PHYSICS) - PERSONAL (BPS-17) GGHSS AZA KHEL PAYAN, NOWSHERA 0307-5409387
ol No 2 (ale PS)	Azakhel	Normal	LHC Aqeel Ahmad No.107 Inv: 0313-0879726	1.FC Hamid Kamal No.142 Police Lines 0311-9420912		Khair Uzzaman Chowkidar 0315- 9105366	Shaheen Shah SSS (Eco) GHSS Pir Pai Nowshera 0333-9659253
ol-No-1	Azakhel	Normal	HC-Asif No-310-Nabi.Court 0321-2654925	✓ 1.FC FC Muhammad Abbas No.1145 Police Lines 0313-1950108	LHW Shagufta Begum 0302- 5445919	Riaz Chowkidar 0341- 2031331	Minhaj ud din SSS(Eng) GHSS Pir Piai, Nowshera 0346-5641693
ndary ayan 1st	Azakhel	Normal	LHC Nawab Ali No.670 Naib Court 0315-7217117	✓ 1.FC Muhammad Abid No.1160 Police Lines 0342-5988242	LHW Musarat Begum 0313- 9121792	Bakht Rawan Chowkidar 0313- 9256589	Sabiha Begum SS ISLAMIYAT (BPS-17) GGHSS AZA KHEL PAYAN, NOWSHERA 0303-8745064
ndary yan	Azakhel	Normal	HC Zahid Ali No.1068 Naib Court 0333-9359982	✓ 1.FC Zia Ur Rahman No.1172 Police Lines 0312-9301756		Amjad Khan Chowkidar 0315-4384204	Muhammad Israr SSS(Civics) GHSS Pir PiaiNowshera 0345-4367038
ndary S (Male)	Azakhel	Normal	LHC Akbar Ali No.533 Naib Court 0333-9193691	1.FC Imdad Hussain No.1180 Police Lines 0313-9171987		Faisal Hayat GGHSS Azakhel Payan	FAZAL-E-JAWAD SST (Science) GHSS Azakhel Payan NSR 3347578643
ol Bela (ale)	Azakhel	Normal	FC Saad Sajjad No.521 PP Pirsabaq 0315-9245869	1.FC Khan Muhammad No.1197 Police Lines 0311-8200382	LHW Azra 0334-1929086	Mushtaq Chowkidar 0301-8185053	SHABANA BIBI SS URDU GGHSS AZAKHEL PAYAN 0324-9810200

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DISTR

N


Tel No. 0923-92201  
Email dpo\_now

Mr. Touheed Ullah  
DSP Security, Nowshera

FACT FINDING INQUIRY

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 Zia-ur-Rahman, 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.600000/-

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

  
District Police Officer,  
Nowshera

پہاں ارمان محمد عباس سے پتہ چلا ہے کہ انہوں نے اپنی کتاب 'The State of Punjab' کے بارے میں ایک کتاب لکھی ہے جس کا نام 'The State of Punjab' ہے۔ انہوں نے اس کتاب میں اپنے خیالات اور نظریات کو واضح طور پر بیان کیا ہے۔ ان کے خیالات اور نظریات کو اس کتاب میں درج کیا گیا ہے۔ ان کے خیالات اور نظریات کو اس کتاب میں درج کیا گیا ہے۔ ان کے خیالات اور نظریات کو اس کتاب میں درج کیا گیا ہے۔

- سوال: کیا DOB بنا ہے؟
- جواب: 01-07-07
- سوال: کیا نام میں 1-1-1988 ہے کیوں؟
- جواب: یہ کیسے ہو گیا ہے اس کا کوئی ٹریس نہیں ہے۔
- سوال: آپ نے ETEP والوں کو کسٹیاں اور سیکورٹی کمانڈو کیوں دیے؟
- جواب: یہاں کیا کمانڈو سینیٹر تھے؟
- سوال: کیا سر پرائیوٹ تھا؟
- جواب: 108/1953-03/13
- سوال: آپ کب اور کہاں تھے؟
- جواب: یہاں کہاں کہاں ہے؟

بیان حلی

میں سے حلیٰ اللہ ولد نذرت اللہ صاحبین سے آرٹ کوڈ نہ ہو  
 بیان حلیٰ کے لیے نوٹیفکیشن کا آرڈر نمبر 11-903007-01  
 جو پائلٹ نمبر 03473649996 میں درج ہے کہ میرا بیان میں سرکاری طور  
 واقعہ کو پیش کیا گیا ہے اور میں اس میں تمام کمرنگ  
 تقریباً عمر سے ایک سال میں پانچ ماہ سے لے کر 10 سال  
 عدالت عام علی (ق) میں عدالت عام علی (ق) کا عدالت عام علی  
 ساکنان خوشی صلیب نوٹیفکیشن ETECA ٹیک ریلورٹس سید پاپا  
 کیا ہے اور اس کا ذکر کان کاغذ میں ہے جس میں ایک سے زیادہ  
 نوٹیفکیشن ہے کہ میری عدالت عام علی (ق) میں  
 قصہ نمبر نہیں کیا ہے اور نہ ہی میری اس میں پرووی  
 ہے۔ یہ بیان ہے تاکہ سڈریج اور یوقہ پروردگار  
 آسے

Chahat

حلیٰ اللہ ولد نذرت اللہ صاحبین سے آرٹ کوڈ نہ ہو  
 11-903007-01  
 0347-3649996

OFFICE OF THE  
SUPERINTENDENT  
POLICE HEADQUARTERS  
NOWSHERA.

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

(27)

2021

Annex

(F)

received to the undersigned  
vide Muhammad Abid No. 1160  
of recruiting agent of police  
Abid No. 1160  
for recruiting agent of police  
Khesghi Bala  
r/o Kheshgi Bala  
r/o Kheshgi Bala

The District Police Officer,  
Nowshera

No. 1496 Dated Nowshera the 24/12/2021.

Subject: FACT FINDING INQUIRY

Memo:

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

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

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

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

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

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



bulali is also in waiting list at S.No. 135. Similarly, statement of Khalil Khan r/o Khesghi an 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 Khesghi 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

From 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 plaining cannot be done without the support of someone having links in ETEA office. Sifatullah SST teacher has played a vital role and who being posted on grade 16 applied for 07 grade is not plausible to a prudent mind. Moreover, during enquiry it has also been learnt that the said Sifatullah usually appears in the ETEA exams in order to help other candidates in passing their exam and for such notorious practices he collects / receives handsome amount. Hence, it is suggested that District Education Officer, Nowshera may be addressed to initiate proper departmental action against Sifatullah (SST Teacher). In order to stop such type of practices and to safeguard/protect the rights of merit of ETEA qualifiers the undersigned suggests the above mentioned newly enlisted constables for major punishment, if agreed, please

Encl: ( 3 )

  
Deputy Superintendent of Police  
Headquarters Nowshera

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Annex (9)

**FINAL SHOW CAUSE NOTICE**

Whereas, you Recruit Constable Muhammad Abbas No. 1145, 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 Abbas No. 1145, s/o of Inam Ali got your test passed through the aforementioned Sifat Ullah and Sifat Ullah received Rs.600000/ from you.

A fact finding enquiry was entrusted to DSP Security, Nowshera into the matter who after fulfillment of legal formalities and submitted his report to the undersigned vide his office letter No. 1496/St. dated 24.12.2021, wherein he highlighted that you being newly enlisted recruit constable and Sifat Ullah School teacher have planned and deliberately provided wrong information to ETEA authority while submitting your online form and hide your real date of birth and qualification just to fulfilled your ulterior motive and you were succeeded in your plans and usurp the right of others merit qualifiers. He further stated that from all the evidence it is crystal clear that you recruit constables used fraudulent means to pass your exam, therefore, recommended you for major punishment.

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

- You are giving same date of birth to ETEA to ensure that you having seat with each other in exam while in reality your date of birth are different.
- A BPS-16 Govt. teacher sat with you in hall who put a wrong date of birth i.e the same as you entered just to ensure that he sit with you. It goes against reason that a BPS-16 serving Govt. employee is applying for BPS-07 job, and to add to it, he was found to be your relative/ villager by entering same date of birth has been able to get seat with you and did not solve his own paper and 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 on test day you have made 01 call with him and you have also conversation with him at other time as well.

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

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

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

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

District Police Officer,  
Nowshera

No. 717 /PA,  
Dated 28/12 /2021.

WITH RESPECT,

To,

DISTRICT POLICE OFFICER NOWSHERA.

SUBJECT: Reply Of Show Cause On Behalf Of Muhammad Abbas S/O Inam  
Ali R/O Kheshgi Bala Tehsil & District Nowshera

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

R/ Sheweth:

- That the Date of Birth wasn't deliberately filled same but was mistakenly and unintentionally filled wrong in ETEA Online Forms by Shaheen Computers Kheshgi Payan who personally admitted it to us that it might be done mistakenly during Filling the Forms as there are hundreds of forms to be filled. Secondly the same mistake was brought in the Notice of ETEA Administration for whom they assured that it wasn't a serious issue and can be rectified at the time of verification of documents. Moreover, it is more negligence of the ETEA for which we are penalized.
- As far as a Govt Teacher namely Sifat Ulla his concerned, we don't know for what and why he appeared In test. It is something irrational that we are asked for those questions which can solely be answered by him. As of my statement that he is our villager is cent percent based on reality. Moreover, skepticism that he assisted you, is unrealistic and far from reason that he assisted us in presence of ETEA Staff.
- Thirdly, of the questions you asked, were roughly in a tense environment where on we were traumatized and threatened. We were time and again warned of Dismissal from service, firstly by DSP Security during conduction of enquiry and every second person in Police Lines that you are going to be dismissed. It seemed more like a trail for punishment rather than enquiry.
- Fourthly, for the answer that Sifat Ullah is our villager is the reality and I haven't denied any contact with him. And about the contact on the test day we had an accident with police personnel serving under your kind command and can been quired. Which was witnessed by several villagers. The contact was made in connection to enquire about the casualties.
- Fifthly, it is alleged that impersonation was carried out during test which turned to be baseless.

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

Yours obediently / sincerely

  
MUHAMMAD ABAS,  
BELT NO.1145

Dated: 03-01-2022

(31)

تاریخ: ۱۳۹۲/۰۳/۰۳

موسسه

مجموعه (۳) ... (۲) ...

Received

PA 03/01/2022

Annex "I"

DISMISSAL ORDER

A complaint was received to the undersigned wherein complainant highlighted that a person namely Sifat Ullah s/o Farzand Ali r/o Khoshgi Bala, who is a School teacher, appeared for other candidates in ETEA test held for recruitment of police constables. Complainant further stated that Recruit Constables Muhammad Abbas No. 1145 son of Inam Ali got his test passed through the aforementioned Sifat Ullah and Sifat Ullah received Rs:600000/ from him.

A fact finding enquiry was entrusted to DSP Security, Nowshera into the matter who after fulfillment of legal formalities and submitted his report to the undersigned vide his office letter No. 1496/St dated 24.12.2021, wherein he highlighted that he newly enlisted recruit constable and Sifat Ullah School teacher have planned and deliberately provided wrong information to ETEA authority while submitting his online form and hide his real date of birth and qualification just to fulfilled his ulterior motive and he succeeded in his plan and usurp the right of others merit qualifiers. He further stated that from all the evidence it is crystal clear that the above mentioned recruit constable used fraudulent means to pass his exam, therefore, recommended that he may be awarded major punishment.

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

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

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

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

On 29.12.2021 he was heard by the undersigned, wherein he failed to produce any cogent reason in his defense, therefore, he is hereby awarded major punishment of dismissal from service from the date of enlistment i.e 09.12.2021, in exercise of the powers vested in me under Police Rules, 1975.

OB 1306

Dated 29/12 /2021.

*[Signature]*  
District Police Officer,  
Nowshera.

No. 3669-74 /PA, dated Nowshera, the 29/12 /2021.

Copy for information and necessary action to:-

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

~~33~~ (34)

Annex A J 11

To

Regional Police Officer,  
Mardan Region. Mardan.

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

Prayer in departmental appeal:

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

Respected Sir,

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

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

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

#### GROUND OF DEPARTMENTAL APPEAL

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



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

(37)

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

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

Yours Obediently,

Muhammed Abbas  
Ex-Constable 1145  
Police Lines  
Nowshera

Dated \_\_\_10/12/2022

(37) (38) Annex (K)

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Recruit Constable Muhammad Abbas No. 1145 of Nowshera District against the order of District Police Officer, Nowshera, whereby he was awarded major punishment of dismissal from service vide OB: No. 1306 dated 29.12.2021 by the District Police Officer, Nowshera. The appellant was proceeded against departmentally on the allegations that a complaint was received to the District Police Officer, Nowshera wherein complainant highlighted that a person namely Sifat Ullah s/o Farzand Ali r/o Kheshgi Bala, who is a School teacher, appeared for other candidates in ETEA test held for recruitment of Police Constables. Complainant further stated that Recruit Constables Muhammad Abid No. 1160, son of Inam Ali got his test passed through above named teacher who in return received Rs;600,000/ from him.

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

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

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

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

Feeling aggrieved from the order of District Police Officer, Nowshera, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 15.03.2022.

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

Keeping in view the above, I, Yaseen Farooq, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

**Order Announced.**

  
Regional Police Officer,  
Mardan.

No. 2564 /ES, Dated Mardan the 30/03 /2022.

Copy forwarded to District Police Officer, Nowshera for information and necessary w/r to his office Memo: No. 137/PA dated 25.01.2022. His Service Record is returned herewith.

(\*\*\*\*\*)

Application under The Right  
to Information Act 2012/13 Act  
KPK

Annex

(L)

To;

The Distc. police Officer  
Nowshera

Subject:- Information required under  
the right to information  
Act 2012/13 KPK.

Sir; Kindly provide me with the  
following information required  
under the Right to information  
Act 2012/13 KPK.

- i) All inquiry Report about the  
three constable (police) namely -  
Muhammad Hadeed belt No-1160  
Zia ur Rehman belt No-1172  
Muhammad Abas Belt no-1145  
Bearing letter no-1496/56 Dated  
24-12-2021
- ii) Complaint along with termination order
- iii) Any other relevant document about  
the inquiry.
- iv) Provide, attendance sheet of  
namely above constable.

 (41)

Your information in this regard  
will be highly appreciated  
by the petitioners.

Yours faithfully,

~~Amir Ali~~

Imam Ali s/o Samar Gul  
R/o Raheemullah Korona  
vill. Keshgi Bala Teh & Dist.  
Nowshera.

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**POWER OF ATTORNEY**

In the Court of Service Tribunal Peshawar

Muhammad Abbas

- For Plaintiff
- Appellant
- Petitioner
- Complainant

Govt of KPK **VERSUS**

- Defendant
- Respondent
- Accused

Appeal/Revision/Suit/Application/Petition/Case No. \_\_\_\_\_ of \_\_\_\_\_ Fixed for \_\_\_\_\_

I/We, the undersigned/ \_\_\_\_\_ do hereby nominate and appoint **YASIR SALEEM ADVOCATE HIGH COURT**, my true and lawful

attorney, for me in my same and on my behalf to appear at \_\_\_\_\_ to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions, An appeal, statements, accounts, exhibits, Compromises or other documents whatsoever, in connection with the said matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out: and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.


AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at \_\_\_\_\_ the \_\_\_\_\_ day to \_\_\_\_\_ the year \_\_\_\_\_

Executant/Executants \_\_\_\_\_ Accepted subject to the terms regarding fee \_\_\_\_\_

  
**YASIR SALEEM**  
 Advocate High Court  
 ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT  
 FR-4, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt



KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL

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Inst No: 3441

Reply/Comments

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Muhammad Abbas

VS

Police

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Advocate: No Advocate

07/02/2023 10:32:08

Date of Hearing 22/12/2022



BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE  
TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 626/2022

Diary No. 3441

Muhammad Abbas Ex-Constable No. 1145 Polie Lines, Nowshera.

Dated 7-2-2023

.....Appellant

**V E R S U S**

Provincial Plice Officer, Khyber Pakhtunkhwa, Peshawar and others.

.....Respondents

I N D E X

S.No.	Description of documents	Annexure	Pages
1.	Reply of Respondents	-	1-4
2.	Affidavit	-	05
3.	Copy of complaint	A	06
4.	Copy of enquiry papers	B	07-23
5.	Copy of show cause notice and reply	C	24-25

Inspector Legal,  
Nowshera

**BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. 626/2022

Muhammad Abbas Ex-Constable No. 1145 Polie Lines, Nowshera.

.....Appellant

**V E R S U S**

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 Fārzand 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").

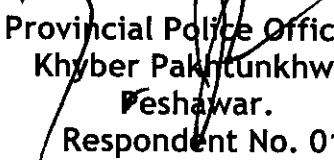
6. Incorrect. During the course of enquiry, enquiry officer collected all relevant material from the ETEA authorities and in the light of that material, the appellant was recommended for major punishment. (Copies of relevant papers are attached with the enquiry report).
7. Incorrect. On 28-12-2021, appellant 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.
- I. Incorrect. Though the appellant, his brothers and one Sifatullah, who was a school teacher in BPS-16, appeared in the ETEA test/exam however, they made such seating arrangement by providing same date of birth i.e 01-01-1998, while submitting their online applications that appellant was 1<sup>st</sup> seated, behind him was Sifatullah (Teacher) and behind Sifatullah were appellant's brothers Muhammad Abid and Zia-ur-Rehman respectively. Sifatullah (teacher) helped them in solving their papers while he himself intentionally failed the ETEA test as he was already working in BPS-16.
- J. Incorrect. It is not appealable to a prudent mind that a person, who as stated by the appellant filled their forms on computer, made wrong entry only to the extent of date of birth of 03 candidates. They mentioned the same date of birth i.e 01-01-1998 only with the intention to be seated in sequence.
- K. Para already explained above.
- L. Para already explained above.
- M. Para already explained above.
- N. Para already explained above.
- O. The respondents also seek permission of this Honourable Tribunal to advance additional grounds at the time of arguments.

**Prayers**

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

  
Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar.  
Respondent No. 01

  
Regional Police Officer,  
Mardan.  
Respondent No. 02

  
District Police Officer,  
Nowshera.  
Respondent No.03

**BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. 626/2022

Muhammad Abbas Ex-Constable No. 1145 Polie Lines, Nowshera.

.....Appellant

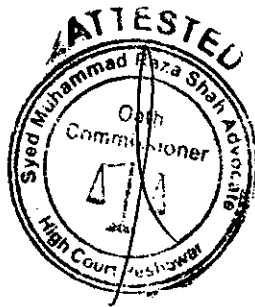
**V E R S U S**

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.



7 FEB 2023

Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar.

Respondent No. 01

Regional Police Officer,  
Mardan.

Respondent No. 02

District Police Officer,  
Nowshera.

Respondent No.03



بعضو ر جناب DPO صاحب نوشہرہ

جناب عالی:-

مود بانہ گزارش ہے کہ حال ہی میں 03 بھائی پولیس میں بھرتی ہوئی ہے۔ اس میں تمام امیدواروں نے دھاندلی کی ہے۔ جتنے بھی امیدواروں نے ٹیسٹ میں حصہ لیا ہے زیادہ تر اپنے جگہ دوسرے بندے کو پیسوں پر بٹھا لیا ہے۔ اور اسکے علاوہ جناب عالی جن بندے نے پیسے لے کر انکی جگہ ٹیسٹ دیا ہے وہ بھی خود ایک سرکاری سکول کا ٹیچر ہے۔ تو اس لیے آپ صاحبان سے درخواست ہے کہ جناب اس میں غریبوں اور میرٹ والوں کا حق بنتا ہے۔ جو یہ ہر دور میں یہ دو نمبر اور غیر قانونی طریقوں سے غریبوں کا حق مارا جا رہا ہے۔ جناب میں جو آپکو یہ درخواست دے رہا ہوں اس میں میرا کوئی ذاتی عناد نہیں ہے لیکن صرف اور صرف ایک غریب کا حق مارا جا رہا ہے۔ جناب عالی ایک سرکاری ملازم جو کہ خود ایک سکول ٹیچر ہے لوگوں سے پیسے لے کر دوسرے غریبوں کا حق لینے کا کوشش کرتا ہے۔ اسی لیے اس سرکاری ملازم کے خلاف قانونی کارروائی کرنی چاہیے اس میں اس سکول ٹیچر کا نام بھی منشن کرتا ہوں۔ صفت اللہ ولد فرزند علی سکنہ خویشگی بالا بگلزئی نوشہرہ۔ جناب عالی جن جن لڑکوں نے ٹیسٹ میں اپلائی کیا تھا اور اسکی جگہ یہ سکول ٹیچر بیٹھ گیا تھا انکے نام یہ ہے جو کہ تینوں بھائی ہے۔ ضیاء الرحمان، محمد عباس اور محمد عابد ولد انعام علی سکنہ خویشگی بالا محلہ رحیم اللہ کورونہ۔ اس ٹیسٹ کو پاس کرنے کے لیے ایک ایک بندے کی جگہ 6/6 لاکھ روپے لیے ہیں۔ جو کہ ٹوٹل رقم 18 لاکھ روپے بنتے ہیں جو کہ غیر قانونی کام ہے اور غریبوں کے حق پر ڈھا کہ ہے۔ اس لیے آپ صاحبان سے التجا ہے کہ آپ صاحبان ان کے خلاف قانونی کارروائی کی جائے۔ جناب اس کے علاوہ ان بندوں کے اور جس بندے نے یہ ٹیسٹ پیسے لیے کر پاس کیا ہے ان کے تمام ثبوت ہمارے پاس ہے جو کہ بروقت ہم آپکو بھیج سکتے ہیں۔

شکر یہ۔





OFFICE OF THE  
DEPUTY SUPERINTENDENT  
OF POLICE HEADQUARTERS  
NOWSHERA

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

⑦  
Amma k B 2 (14)  
2021

To:

The District Police Officer,  
Nowshera.

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

**Subject:** FACT FINDING INQUIRY

**Memo:**

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

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

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

01. Recruitment/ Exam SOPs
02. Criteria for allotment of roll numbers to the candidates and to explain how 04 persons three brothers roll numbers were allotted in order.
03. Complete details of recruitment process of the below mentioned 04 candidates.

01. Sifat Ullah s/o Farzand Ali r/o Nowshera
02. Zia Ur Rehman s/o Inam Ali r/o Nowshera
03. Muhammad Abbas s/o Inam Ali r/o Nowshera
04. Muhammad Abid s/o Inam Ali r/o Nowshera

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

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

(8) (15)

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.

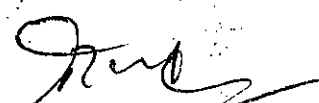
02) According to ETEA report all the above mentioned 04 candidates wrote/mentioned their D.O.B as 01.01.1998 including 03 brothers in their online applications form of police constables and ETEA authorities allotted them roll number on date of birth field / column from oldest to newest. Similarly, in 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

From 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



GOVERNMENT OF KHYBER PAKHTUNKHWA  
Educational Testing & Evaluation Agency (ETE A) Peshawar

21

(11)

NO. ETE A/3-3/Misc./

Dated: 08/12/2021

To

The District Police Officer (DPO)  
Nowshera

Subject: COMPLAINT

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 (Admin)

Copy to:-

- The Director (Admin & Finance), ETE A
- A to Executive Director ETE A

Deputy Director (Admin)

Chairman, Board of Governors: Chief Minister Khyber Pakhtunkhwa

Plot-22, Street-13, Phase-VII, Hayatabad, Peshawar. Phone: (091) 9219049-78 Fax: 091-9219039  
Web Site: [www.etea.edu.pk](http://www.etea.edu.pk) email: [info@etea.edu.pk](mailto:info@etea.edu.pk)



(9)

2021

**OFFICE OF THE  
DEPUTY SUPERINTENDENT OF  
POLICE HEADQUARTER,  
NOWSHERA**

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

No. 1463 /S, Dated Nowshera the 14/12 /2021.

Subject: **PROVISION OF EVIDENCE/RECORDING OF  
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 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.

*[Signature]*  
DEPUTY SUPERINTENDENT  
OF POLICE HEADQUARTER,  
NOWSHERA

w/c



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 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, roll 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 online server. In the instant case, date of birth of the candidates, as per online application form (Annex-II) is same, therefore, their roll numbers for physical test were automatically generated/allotted in order while for written test when the requisite data is sorted on "picture" field/column, the allotted roll numbers came in the same order.

The undersigned have been nominated for recording statement.

  
Deputy Director (IT)  
ETEA

Copy to:-

- Executive Director ETEA

Chairman, Board of Governors, Chief Minister Khyber Pakhtunkhwa



KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY  
(ETEA)

Online Application Form of Police Constable (BPS-07)

NAME: SIFAT ULLAH  
FATHER/HUSBAND'S NAME: FARZAND ALI  
APPLICANT CNIC NO: 1720161849145  
DATE OF BIRTH: 1 JANUARY-1998  
RELIGION: MUSLIM  
POLICE SON: NO  
GENDER: MALE  
DOMICILE: NOWSHERA  
POSTAL ADDRESS: KHESHGI BALA, PO KHESHGI PAYAN, TEH AND DIST  
NOWSHERA  
PERMANENT ADDRESS: KHESHGI BALA, PO KHESHGI PAYAN, TEH AND DIST  
NOWSHERA



Educational Information:

Highest Qualification: HSSC/ Intermediate/ A - level

Degree	Passing Year	Obtain Marks	Total Marks	Board
Matric / SSC	2011	851	1050	BISEM



KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY  
(ETEA)

(23)

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Online Application Form of Police Constable (BPS-07)

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



**Educational Information:**

**Highest Qualification:** HSSC/ Intermediate/ A --level

Degree	Passing Year	Obtain Marks	Total Marks	Board
Matric / SSC	2018	620	1100	BISEM



KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY  
(ETEA)

Online Application Form of Police Constable (BPS-07)

NAME: MUHAMMAD ABBAS  
FATHER/HUSBAND'S NAME: INAM ALI  
APPLICANT CNIC NO: 1720105492443  
DATE OF BIRTH: 1-JANUARY-1998  
RELIGION: MUSLIM  
POLICE SON: NO  
GENDER: MALE  
DOMICILE: NOWSHERA  
POSTAL ADDRESS: RAHEEM ULLAH KOROONA, KHESHGI BALA PO  
KHESHGI PAYAN TEH AND DIST NOWSHERA  
PERMANENT ADDRESS: RAHEEM ULLAH KOROONA, KHESHGI BALA PO  
KHESHGI PAYAN TEH AND DIST NOWSHERA



**Educational Information:**

Highest Qualification: HSSC/ Intermediate/ A - level

Degree	Passing Year	Obtained Marks	Total Marks	Board
Matric / SSC	2018	551	1100	BISEM





KHYBER PAKHTUNKHWA EDUCATIONAL TESTING & EVALUATION AGENCY  
(ETEA)

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Online Application Form of Police Constable (8PS-07)

NAME: MUHAMMAD ABID  
FATHER/HUSBAND'S NAME: INAM ALI  
APPLICANT CNIC NO: 1720103598981  
DATE OF BIRTH: 1-JANUARY-1998  
RELIGION: MUSLIM  
POLICE SON: NO  
GENDER: MALE  
DOMICILE: NOWSHERA  
POSTAL ADDRESS: RAHEEM ULLAH KOROONA, KHESHGI BALA, PO  
KHESHGI PAYAN, TEH AND DIST NOWSHERA  
PERMANENT ADDRESS: RAHEEM ULLAH KOROONA, KHESHGI BALA, PO  
KHESHGI PAYAN, TEH AND DIST NOWSHERA



**Educational Information:**

Highest Qualification: HSSC/ Intermediate/ A - level

Degree	Passing Year	Obtained Marks	Total Marks	Board
Matric / SSC	2015	527	1100	BISEM

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

ROLL NO. 65367 NAME: SIFAT ULLAH

ANSWER SHEET SERIAL NO. 436337 SIGNATURE: Sifat Ullah

TOTAL TIME: 30 MINUTES MAX MARKS: 20

**TRANSLATE INTO FORMAL URDU**

1) My father has been drawing pension since 2010.

میرا باپ 2010 سے پنشن وصول کر رہا ہے۔

2) I have been working since morning.

میں صبح سے کام کر رہا ہوں۔

3) We do not know their names.

ہم ان کا نام نہیں جانتے۔

4) Go with me outside.

میرے ساتھ باہر جاؤ۔

5) I am ill.

میں بیمار ہوں۔

**TRANSLATE INTO ENGLISH**

6) وہ آپ کے ساتھ کام کرنا چاہتی ہے۔

She wants to work with you.

7) یہاں میرے ساتھ رہو۔

Stay here, with me.

8) ہم سب تھے جوئے ہیں۔

9) یہ پیسے اپنی جیب میں رکھیں۔

10) میں نے آپ کے بارے میں بہت سنا ہے۔

**FORMATION OF SENTENCES (جملوں کو درست ترتیب دیں)**

13) آپ ابھی کیا کریں گے یا پلاٹا کس ہے کہ تھی۔

12) پنجاب کے میرا زخمی کریمارڈل کو۔

13) آپ کے کس نام کا ہے وہ تو ہر وقت۔

14) دریا تیر ہی تھی بچلی میں۔

15) بہار کا موسم بہتر تاثیر ہے اور بہت۔

16) چھانے لگ گیا سر نہ لگا کر وہ آگے۔

17) جان پر کھیل کر لڑی فوج تھی ہماری۔

18) تمام سکولوں سے بازی لے گیا سکول بہارا میں کرکٹ۔

19) جو باقاعدگی سے کی جاتی ہے سب سے اچھی ورزش ہے دو۔

10) ہونا چاہئے انجام ہے عیس کا اچھا۔

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

ROLL NO. 65369 NAME. ZIA UR RAHMAN

ANSWER SHEET SERIAL NO. 436339 SIGNATURE. Ziaur Rahman

TOTAL TIME: 30 MINUTES

MAX MARKS: 20

TRANSLATE INTO FORMAL URDU

1) My father has been drawing pension since 2010.

14  
میرا والد 2010 سے پنشن وصول کر رہا ہے۔

2) I have been working since morning.

صبح 6 بجے سے کام کر رہا ہوں۔

3) We do not know their names.

ان کے نام ہمیں جانتے نہیں۔

4) Go with me outside.

میرے ساتھ باہر چلو۔

5) I am ill.

میں بیمار ہوں۔

TRANSLATE INTO ENGLISH

16 وہ آپ کے ساتھ کام کرنا چاہتی ہے۔

She wants to work with you.

17 یہاں سے نکلنا ہے۔

Stay here, with me.

18 ہم سب کے ساتھ ہیں۔

We are all fixed.

19 یہ بے اپنا جیب میں رکھیں۔

Keep this money in your pocket.

10 میں نے آپ کے بارے میں سنا ہے۔

I have heard a lot about you.

FORMATION OF SENTENCES (جملوں کو درست ترتیب میں)

1) آپ بھی کیا کریں گے یاد پالاؤ اس کے کہ جی سے۔

آپ بھی کیا کریں گے یاد پالاؤ اس کے کہ جی سے۔

2) بیچارے میرا زخمی کر کہاں کو۔

بیچارے میرا زخمی کر کہاں کو۔

3) آپ کے من اس کا ہے وہ تو پر وقت۔

آپ کے من اس کا ہے وہ تو پر وقت۔

4) دریا تیر رہی تھی پھلی میں۔

دریا تیر رہی تھی پھلی میں۔

5) ہمارا موسم بہار کا ہے ہوتا ہے۔

ہمارا موسم بہار کا ہے ہوتا ہے۔

6) چھانے تک یا سہرے لگا کر وہ آگے۔

چھانے تک یا سہرے لگا کر وہ آگے۔

7) جان پر کھیل کر لڑی فوج تھی ہماری۔

جان پر کھیل کر لڑی فوج تھی ہماری۔

8) تمام سکولوں سے بازی لے لیا سکول ہمارا میں کرے۔

تمام سکولوں سے بازی لے لیا سکول ہمارا میں کرے۔

9) جو باتا ہے کسی کا ہے سب سے اچھی ورزش ہے وہ۔

جو باتا ہے کسی کا ہے سب سے اچھی ورزش ہے وہ۔

10) ہر ماہی کے انجم سے نکل کا بیچا۔

ہر ماہی کے انجم سے نکل کا بیچا۔

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

ROLL NO. 65 366 NAME. Muhamma d Abbas

ANSWER SHEET SERIAL NO. 1436938 SIGNATURE. [Signature]

TOTAL TIME: 30 MINUTES

MAX MARKS: 20

TRANSLATE INTO FORMAL URDU

FORMATION OF SENTENCES (دست ترتیب دس)

1) My father has been drawing pension since 2010.

پیرا دال قلمبند سے 2010 سے پنشن کھینچ رہا ہے۔

1) آپ بھی کیا کریں گے یا دیا پلا پڑا کس ہے کہ جی۔ سنی سے پلا پڑا ہے

آپ بھی پیرا پلا پڑا پلا پڑا پلا پڑا پلا پڑا

2) I have been working since morning.

میں صبح سے کام کرتا رہا ہوں۔

2) صبح سے کام کرتا رہا ہوں۔

میں صبح سے کام کرتا رہا ہوں۔

3) We do not know their names.

ہم ان کے نام نہیں جانتے۔

3) ہم ان کے نام نہیں جانتے۔

ہم ان کے نام نہیں جانتے۔

4) Go with me outside.

میں کے ساتھ باہر چلو۔

4) میرا ہم ساتھ چلیں۔

میں کے ساتھ باہر چلو۔

5) I am ill.

میں بیمار ہوں۔

5) بیمار ہوں۔

میں بیمار ہوں۔

TRANSLATE INTO ENGLISH

16 وہ آپ کے ساتھ کام کرنا چاہتی ہے۔  
She wants to work with me.

16 جاننے کیلئے کہ وہ آپ کے ساتھ کام کرنا چاہتی ہے۔  
She wants to work with me.

17 Stay here with me.  
18 ہم بٹھے ہوئے ہیں۔

17 تمام کھانوں سے لڑائی لے کر یہاں رہیں۔  
18 ہم بٹھے ہوئے ہیں۔

19 we are all fixed.  
یہ سب ایسی جیب میں رکھیں۔

19 ہم سب ایک جگہ ہیں۔  
یہ سب ایسی جیب میں رکھیں۔

20 Keep this in your pocket.  
10 میں نے آپ کے بارے میں سنا ہے۔

20 اسے اپنے جیب میں رکھیں۔  
10 میں نے آپ کے بارے میں سنا ہے۔

have heard a lot about

(14) (26)  
**RECRUITMENT OF POLICE CONSTABLES/ TRAFFIC WARDEN CONSTABLES**  
**KHYBER PAKHTUNKHWA, POLICE DEPARTMENT**

ROLL NO. 65368 NAME. M. A. Bich

ANSWER SHEET SERIAL NO. 436338 SIGNATURE. M. A. Bich

TOTAL TIME: 30 MINUTES

MAX MARKS: 20

**TRANSLATE INTO FORMAL URDU**

**FORMATION OF SENTENCES (جملوں کو درست ترتیب دیں)**

1) My father has been drawing pension since 2010.

11 آپ بھی کیا کریں گے یا پالا پڑا کس ہے کہ جی ہے۔

عمر ادا کے علاوہ سے پیش وصول کر رہے ہیں

آپ کو کیا یاد کریں گے کہ اس میں سے

2) I have been working since morning.

12 شام کے بعد از صبح کے بعد لکھو۔

میں سے صبح سے کام کر رہے ہوں

عمر ادا کے بعد لکھو

3) We do not know their names.

13 آپ کے نام ہی لکھنا ہے وہ تو ہر وقت۔

ہم ان کے نام نہیں جانتے

عمر ادا کے بعد لکھو

4) Go with me outside.

14 دریا پر رہنا ہی چاہیے۔

میں سے باہر جاؤ

لکھو

5) I am ill.

15 بہار کا موسم بہتر ہے اور صحت۔

میں بیمار ہوں

بہار کا موسم بہتر ہے اور صحت۔

**TRANSLATE INTO ENGLISH**

16 وہ آپ کے ساتھ کام کرنا چاہتی ہے۔  
= with you

She wants to work with me.

17 یہاں سے باہر جاؤ۔

Stay here with me.

18 ہم سب جئے ہوئے ہیں۔

We are all fixed.

19 یہ پیکچر جیب میں رکھیں۔

Keep this money in your pocket.

10 میں نے آپ کے ہاتھ میں پتہ لکھا ہے۔

I have told about

16 وہ آپ کے ساتھ کام کرنا چاہتی ہے۔  
= with you

17 یہاں سے باہر جاؤ۔

18 ہم سب جئے ہوئے ہیں۔

19 یہ پیکچر جیب میں رکھیں۔

20 میں نے آپ کے ہاتھ میں پتہ لکھا ہے۔

21

22

23

24

25



**KHYBER PAKHTUNKHWA**  
**EDUCATIONAL TESTING & EVALUATION**  
**AGENCY (ETEA) PESHAWAR**

17

**ROLL NUMBER**

6	5	3	6	7					
0	0	0	0	0	0	0	0	0	0
1	1	1	1	1	1	1	1	1	1
2	2	2	2	2	2	2	2	2	2
3	3	3	3	3	3	3	3	3	3
4	4	4	4	4	4	4	4	4	4
5	5	5	5	5	5	5	5	5	5
6	6	6	6	6	6	6	6	6	6
7	7	7	7	7	7	7	7	7	7
8	8	8	8	8	8	8	8	8	8
9	9	9	9	9	9	9	9	9	9

**SERIAL NO:**

436337

Picture/Thumb

Roll Number: 65367

Name: SIFAT ULLAH

Exam/Test For: Police Constable

Test Center: ANKUM, Mardan Shaikh Malloom

Test Date: 19-09-2021

NIC No: 17201-6184914-S

- PAPER:**
- D
  - C
  - D
  - E
  - F
  - G
  - H
  - J
  - J
  - K
  - L
  - M
  - N
  - O
  - P

**ANSWERS (FILL SUITABLE) CIRCLE WITH BLUE OR BLACK MARKER)**

1	A B <input checked="" type="radio"/> D	21	A B C D	41	A B C D	61	A B C D	81	A B C D
2	A <input checked="" type="radio"/> C D	22	A B C D	42	A B C D	62	A B C D	82	A B C D
3	A B <input checked="" type="radio"/> D	23	A B C D	43	A B C D	63	A B C D	83	A B C D
4	A <input checked="" type="radio"/> C D	24	A B C D	44	A B C D	64	A B C D	84	A B C D
5	<input checked="" type="radio"/> B C D	25	A B C D	45	A B C D	65	A B C D	85	A B C D
6	A <input checked="" type="radio"/> C D	26	A B C D	46	A B C D	66	A B C D	86	A B C D
7	A B <input checked="" type="radio"/> D	27	A B C D	47	A B C D	67	A B C D	87	A B C D
8	A <input checked="" type="radio"/> C D	28	A B C D	48	A B C D	68	A B C D	88	A B C D
9	<input checked="" type="radio"/> B C D	29	A <input checked="" type="radio"/> C D	49	A B C D	69	A B C D	89	A B C D
10	A B <input checked="" type="radio"/> D	30	A B C D	50	A B C D	70	A B C D	90	A B C D
11	A B <input checked="" type="radio"/> D	31	A <input checked="" type="radio"/> C D	51	A B C D	71	A B C D	91	A B C D
12	A <input checked="" type="radio"/> C D	32	A B C D	52	A B C D	72	A B C D	92	A B C D
13	<input checked="" type="radio"/> B C D	33	A B C D	53	A B C D	73	A B C D	93	A B C D
14	A <input checked="" type="radio"/> C D	34	A B C D	54	A B C D	74	A B C D	94	A B C D
15	A B <input checked="" type="radio"/> D	35	A B C D	55	A B C D	75	A B C D	95	A B C D
16	A <input checked="" type="radio"/> C D	36	A B C D	56	A B C D	76	A B C D	96	A B C D
17	<input checked="" type="radio"/> B C D	37	A B C D	57	A B C D	77	A B C D	97	A B C D
18	A <input checked="" type="radio"/> C D	38	A B C D	58	A B C D	78	A B C D	98	A B C D
19	A B C D	39	A B C D	59	A B C D	79	A B C D	99	A B C D
20	A B C D	40	A B C D	60	A B C D	80	A B C D	100	A B C D

**CERTIFICATION STATEMENT**

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

*Sifat Ullah*  
 Signature

**Instructions**

Mark your answers with Blue or Black Ink Marker/Ballpoint. Fill in the information very carefully as explained in example. Multiple response to any Question will be treated as INCORRECT ANSWER. On your answer sheet for each question there are 4 choices (i.e. A, B, C, D). Fill the correct option of the answer properly (as per example). You can carry out your rough work anywhere on the question paper. Put your pens down as soon as you hear (STOP WRITING) otherwise your paper will be canceled. Any one found using unfair means will be disqualified. Use of MOBILE PHONE/CALCULATOR OR ANY OTHER Electronic Devices are not allowed during examination. Defaulter will get their paper cancelled and device will be confiscated.

**Correct Way Of Filling**      **Incorrect Way Of Filling**





**KHYBER PAKHTUNKHWA**  
**EDUCATIONAL TESTING & EVALUATION**  
**AGENCY (ETEA) PESHAWAR**

(19)

**ROLL NUMBER**

6	5	3	6	9					
0	0	0	0	0	0	0	0	0	0
1	1	1	1	1	1	1	1	1	1
2	2	2	2	2	2	2	2	2	2
3	3	3	3	3	3	3	3	3	3
4	4	4	4	4	4	4	4	4	4
5	5	5	5	5	5	5	5	5	5
6	6	6	6	6	6	6	6	6	6
7	7	7	7	7	7	7	7	7	7
8	8	8	8	8	8	8	8	8	8
9	9	9	9	9	9	9	9	9	9

**SERIAL NO:**

436339

Picture/Thumb

Roll Number: 65369

Name: ZIA UR RAHMAN

Exam/Test For: Police Constable

Test Center: (LAWKU) Mardan (GARDEN) Shaikh Mal

Test Date: 19-1-2021

CNIC No: 17201-5991846-3

- Instructions**
1. Mark your answers with Blue or Black Ink Marker/Ballpoint.
  2. Fill in the information very carefully as explained in example.
  3. Multiple response to any Question will be treated as INCORRECT ANSWER.
  4. On your answer sheet for each question there are 4 choices (i.e. A, B, C, D). Fill the correct option of the answer properly (as per Example).
  5. You can carry out your rough work anywhere on the question paper.
  6. Put your pens down as soon as you hear (STOP WRITING) otherwise your paper will be canceled.
  7. Any one found using unfair means will be disqualified.
  8. Use of MOBILE PHONE/CALCULATOR OR ANY OTHER Electronic Devices are not allowed during examination. Defaulter will get their paper cancelled and device will be confiscated.

**Correct Way Of Filling**      **Incorrect Way Of Filling**

(A) (B) (C) (D)      (X) (V) (D)

PAPER:

(A)

(B)

(C)

(D)

(E)

(F)

(G)

(H)

(I)

(J)

(K)

(L)

(M)

(N)

(O)

(P)

**CERTIFICATION STATEMENT**

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

Signature

**ANSWERS (FILL SUITABLE CIRCLE WITH BLUE OR BLACK MARKER)**

1	(B)	21	(A)	41	(A)	61	(A)	81	(A)
2	(B)	22	(A)	42	(A)	62	(B)	82	(A)
3	(A)	23	(A)	43	(A)	63	(B)	83	(A)
4	(B)	24	(A)	44	(A)	64	(A)	84	(A)
5	(A)	25	(B)	45	(B)	65	(A)	85	(A)
6	(A)	26	(A)	46	(B)	66	(A)	86	(A)
7	(B)	27	(B)	47	(B)	67	(A)	87	(A)
8	(A)	28	(A)	48	(A)	68	(A)	88	(A)
9	(A)	29	(A)	49	(A)	69	(A)	89	(A)
10	(B)	30	(B)	50	(B)	70	(B)	90	(A)
11	(A)	31	(A)	51	(B)	71	(A)	91	(A)
12	(A)	32	(A)	52	(A)	72	(B)	92	(A)
13	(A)	33	(A)	53	(A)	73	(B)	93	(A)
14	(B)	34	(A)	54	(A)	74	(A)	94	(A)
15	(B)	35	(A)	55	(A)	75	(B)	95	(A)
16	(A)	36	(A)	56	(A)	76	(A)	96	(A)
17	(B)	37	(A)	57	(A)	77	(B)	97	(A)
18	(A)	38	(B)	58	(A)	78	(A)	98	(A)
19	(A)	39	(B)	59	(B)	79	(A)	99	(A)
20	(A)	40	(B)	60	(B)	80	(B)	100	(A)



**KHYBER PAKHTUNKHWA**  
**EDUCATIONAL TESTING & EVALUATION**  
**AGENCY (ETEA) PESHAWAR**

PAPER:

- A
- B
- C
- D
- E
- F
- G
- H
- I
- J
- K
- L
- M
- N
- O
- P

ROLL NUMBER									
6	5	3	6	6					
0	0	0	0	0	0	0	0	0	0
1	1	1	1	1	1	1	1	1	1
2	2	2	2	2	2	2	2	2	2
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4	4	4	4	4	4	4	4	4	4
5	5	5	5	5	5	5	5	5	5
6	6	6	6	6	6	6	6	6	6
7	7	7	7	7	7	7	7	7	7
8	8	8	8	8	8	8	8	8	8
9	9	9	9	9	9	9	9	9	9

SERIAL NO.

Picture/Thumb

Roll Number: 65 366

Name: MUHAMMAD ABBAS

Exam/Test For: police constable

Test Center: Aukwm (Mardan, Sharikhta)

Test Date: 19-09-2021

CNIC No: 17201-0549244-3

**Instructions**

- Mark your answers with Blue or Black Ink Marker/Ballpoint.
- Fill in the information very carefully as explained in example.
- Multiple response to any Question will be treated as INCORRECT ANSWER.
- On your answer sheet for each question there are 4 choices (i.e. A, B, C, D). Fill the correct option of the answer properly (as per Example).
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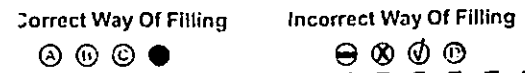
**CERTIFICATION STATEMENT**

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

Signature

**ANSWERS (FILL SUITABLE CIRCLE WITH BLUE OR BLACK MARKER)**

1. A B C ●	21 ● B C D	41 ● D C D	61 A B ● D	81 A B C D
2. ● B C D	22 A B ●	42 A ● C D	62 A B ● D	82 A B C D
3. ● B C D	23 A B ● D	43 A B C ●	63 A B C ●	83 A B C D
4. A B ● D	24 A B C ●	44 A B ● D	64 A ● C D	84 A B C D
5. A B ● D	25 ● B C D	45 A ● C D	65 ● B C D	85 A B C D
6. A B ● D	26 ● B C D	46 ● B C D	66 A B ● D	86 A B C D
7. ● B C D	27 A ● C D	47 A B ● D	67 ● B C D	87 A B C D
8. ● B C D	28 A ● C D	48 ● B C D	68 A B C ●	88 A B C D
9. A B C ●	29 A B ● D	49 A ● C D	69 A ● C D	89 A B C D
10. A ● C D	30 A ● C D	50 A B ● D	70 ● B C D	90 A B C D
11. A ● C D	31 A ● C D	51 A ● C D	71 A ● C D	91 A B C D
12. A ● C D	32 A B ● D	52 A ● C D	72 A ● C D	92 A B C D
13. A ● C D	33 A ● C D	53 A ● C D	73 A ● C D	93 A B C D
14. A B C ●	34 A ● C D	54 A B ● D	74 A ● C D	94 A B C D
15. A B ● D	35 A B ● D	55 A B ● D	75 A B C ●	95 A B C D
16. ● B C D	36 ● B C D	56 A B ● D	76 A B ● D	96 A B C D
17. A B ● D	37 A B ● D	57 A B ● D	77 ● B C D	97 A B C D
18. A B ● D	38 ● B C D	58 ● B C D	78 A B C ●	98 A B C D
19. ● B C D	39 A ● C D	59 ● B C D	79 A ● C D	99 A B C D
20. ● B C D	40 A B ● D	60 A ● C D	80 ● B C D	100 A B C D







**KHYBER PAKHTUNKHWA**  
**EDUCATIONAL TESTING & EVALUATION**  
**AGENCY (ETEA) PESHAWAR**

**ROLL NUMBER**

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4	4	4	4	4	4	4	4	4	4
5	5	5	5	5	5	5	5	5	5
6	6	6	6	6	6	6	6	6	6
7	7	7	7	7	7	7	7	7	7
8	8	8	8	8	8	8	8	8	8
9	9	9	9	9	9	9	9	9	9

**SERIAL NO:**

436338

Picture/Thumb

Roll Number: 65368

Name: MUHAMMAD ABID

Exam/Test For: Police Constable

Test Center: (Ankum) GARDEN

Test Date: 19/09/2021

CNIC No: 17201-0359898-1

**Instructions**

1. Mark your answers with Blue or Black Ink Marker/Ballpoint.
2. Fill in the information very carefully as explained in example.
3. Multiple response to any Question will be treated as INCORRECT ANSWER.
4. On your answer sheet for each question there are 4 choices (i.e. A, B, C, D). Fill the correct option of the answer properly (as per example).
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6. Put your pens down as soon as you hear (STOP WRITING) otherwise your paper will be canceled.
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Correct Way Of Filling      Incorrect Way Of Filling



PAPER:

- (A)
- (B)
- (C)
- (D)
- (E)
- (F)
- (G)
- (H)
- (I)
- (J)
- (K)
- (L)
- (M)
- (N)
- (O)
- (P)

**ANSWERS (FILL SUITABLE CIRCLE WITH BLUE OR BLACK MARKER)**

1	(A) (H) (D)	21	(A) (C) (D)	41	(A) (D) (C)	61	(B) (C) (D)	81	(A) (B) (C) (D)
2	(A) (H) (D)	22	(B) (L) (D)	42	(B) (C) (D)	62	(A) (B) (C) (D)	82	(A) (B) (C) (D)
3	(A) (H) (D)	23	(A) (H) (D)	43	(B) (C) (D)	63	(A) (C) (D)	83	(A) (B) (C) (D)
4	(A) (H) (D)	24	(B) (C) (D)	44	(A) (C) (D)	64	(A) (C) (D)	84	(A) (B) (C) (D)
5	(B) (C) (D)	25	(A) (B) (C) (D)	45	(A) (C) (D)	65	(A) (C) (D)	85	(A) (B) (C) (D)
6	(B) (C) (D)	26	(A) (C) (D)	46	(A) (C) (D)	66	(A) (B) (D)	86	(A) (B) (C) (D)
7	(A) (C) (D)	27	(C) (D)	47	(A) (B) (C) (D)	67	(A) (C) (D)	87	(A) (B) (C) (D)
8	(A) (C) (D)	28	(C) (D)	48	(A) (B) (D)	68	(A) (B) (D)	88	(A) (B) (C) (D)
9	(A) (B) (C) (D)	29	(A) (C) (D)	49	(B) (C) (D)	69	(A) (B) (D)	89	(A) (B) (C) (D)
10	(A) (B) (C) (D)	30	(A) (C) (D)	50	(B) (C) (D)	70	(A) (C) (D)	90	(A) (B) (C) (D)
11	(A) (B) (C) (D)	31	(A) (C) (D)	51	(B) (C) (D)	71	(A) (C) (D)	91	(A) (B) (C) (D)
12	(B) (C) (D)	32	(A) (H) (C) (D)	52	(B) (C) (D)	72	(A) (C) (D)	92	(A) (B) (C) (D)
13	(A) (B) (C) (D)	33	(A) (B) (C) (D)	53	(B) (C) (D)	73	(B) (C) (D)	93	(A) (B) (C) (D)
14	(B) (C) (D)	34	(A) (C) (D)	54	(A) (B) (C) (D)	74	(A) (B) (D)	94	(A) (B) (C) (D)
15	(A) (B) (C) (D)	35	(A) (B) (C) (D)	55	(B) (C) (D)	75	(B) (C) (D)	95	(A) (B) (C) (D)
16	(A) (B) (C) (D)	36	(A) (C) (D)	56	(B) (C) (D)	76	(B) (C) (D)	96	(A) (B) (C) (D)
17	(B) (C) (D)	37	(B) (C) (D)	57	(A) (C) (D)	77	(A) (B) (D)	97	(A) (B) (C) (D)
18	(A) (C) (D)	38	(B) (C) (D)	58	(A) (B) (C) (D)	78	(A) (C) (D)	98	(A) (B) (C) (D)
19	(A) (B) (C) (D)	39	(A) (B) (C) (D)	59	(A) (B) (C) (D)	79	(A) (B) (C) (D)	99	(A) (B) (C) (D)
20	(B) (C) (D)	40	(A) (B) (C) (D)	60	(B) (C) (D)	80	(A) (B) (D)	100	(A) (B) (C) (D)

**CERTIFICATION STATEMENT**

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

*(Signature)*  
 Signature

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### FINAL SHOW CAUSE NOTICE

Whereas, you **Recruit Constable Muhammad Abbas No. 1145**, 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 Khesghi 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 Abbas No. 1145, s/o of Inam Ali got your test passed through the aforementioned Sifat Ullah and Sifat Ullah received Rs;600000/ from you.

A fact finding enquiry was entrusted to DSP Security, Nowshera into the matter who after fulfillment of legal formalities and submitted his report to the undersigned vide his office letter No. 1496/St dated 24.12.2021, wherein he highlighted that you being newly enlisted recruit constable and Sifat Ullah School teacher have planned and deliberately provided wrong information to ETEA authority while submitting your online form and hide your real date of birth and qualification just to fulfilled your ulterior motive and you were succeeded in your plans and usurp the right of others merit qualifiers. He further stated that from all the evidence it is crystal clear that you recruit constables used fraudulent means to pass your exam, therefore, recommended you for major punishment.

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

- You are giving same date of birth to ETEA to ensure that you having seat with each other in exam while in reality your date of birth are different.
- A BPS-16 Govt. teacher sat with you in hall who put a wrong date of birth i.e the same as you entered just to ensure that he sit with you. It goes against reason that a BPS-16 serving Govt. employee is applying for BPS-07 job, and to add to it, he was found to be your relative/ villager by entering same date of birth has been able to get seat with you and did not solve his own paper and 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 on test day you have made 01 call with him and you have also conversation with him at other time as well.

28/12/2021

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

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

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

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

District Police Officer,  
Nowshera

No. 717 IPA,  
Dated 28/12/2021

صاف ۱۵۱

مخبرانہ سٹیج، ڈاؤن ممبروں کو صرف ہونے میں نے ایس میں کئی کئی گھنٹوں  
 کے لیے ایڈوائس کیا تھا اور اپنے (Documents) میں بھی لکھ کر دیا  
 ہے کہ قلمی کاروں سے Shop ہے اور جس نام ہے کو ایڈوائس  
 کے لیے دیا گیا اور اس کے بعد فوراً ہی ڈاؤن میں  
 حصہ لیا ہے اور Writers کے لیے ایس کے لیے  
 تمام کھپائی سہولتوں میں نے کسی کو کھپائی کے لیے  
 کوئی رقم دیکھ نہیں دی ہے۔ میرا شریکار ڈاؤن  
 تقریباً کسی کاروائی کے داخل دفتر آئے ہیں۔

حسن فرید شاہ

۲۴/۱۲/۲۱

مخبرانہ سٹیج، ڈاؤن ممبروں کو صرف ہونے میں نے ایس میں کئی کئی گھنٹوں کے لیے ایڈوائس کیا تھا اور اپنے (Documents) میں بھی لکھ کر دیا ہے کہ قلمی کاروں سے Shop ہے اور جس نام ہے کو ایڈوائس کے لیے دیا گیا اور اس کے بعد فوراً ہی ڈاؤن میں حصہ لیا ہے اور اس کے لیے ایس کے لیے تمام کھپائی سہولتوں میں نے کسی کو کھپائی کے لیے کوئی رقم دیکھ نہیں دی ہے۔ میرا شریکار ڈاؤن تقریباً کسی کاروائی کے داخل دفتر آئے ہیں۔

Dimish