

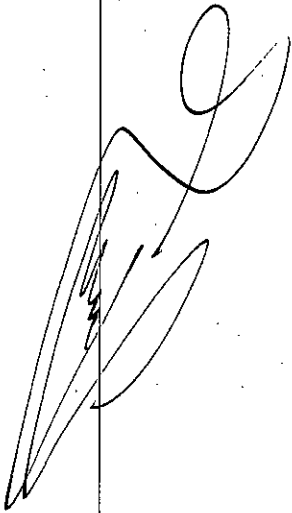
Sr. No.	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	06.07.2015	<p style="text-align: center;">BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</p> <p style="text-align: center;">Appeal No. 1059/2014</p> <p>Nasir Uddin Versus the Secretary Home & Tribal Affairs Government of Khyber Pakhtunkhwa, Peshawar etc.</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER.-</u> Counsel for the appellant (Mr. Ashraf Ali Khattak, Advocate), Assistant A.G with Sheryar, ASJ for the official respondents and counsel for private respondent No. 4 (Muhammad Jehangir Khan, Advocate) present.</p> <p>2. According to appellant Nasir Uddin that after rendering service for about seven years in the Central Jail Bannu, he was transferred therefrom vide order dated 06.03.2013 and posted at Central Jail, Haripur in place of private respondent No. 4 (Mr. Majid Ghufra) who had remained for eight years as Budget & Accounts Officer in Central Jail Haripur. That vide impugned order dated 09.4.2014, the competent authority once again transferred the appellant back to Bannu and private respondent No. 4 back to Haripur. Departmental appeal of the appellant was also rejected vide order dated 17.07.2014, hence this appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.</p> <p>3. Arguments heard and record perused.</p> <p>4. The learned counsel for the appellant submitted that</p>

premature transfer after eight months in violation of the posting transfer policy, is based on victimization and is politically motivated, hence liable to be set aside. In the impugned order dated 09.4.2014, reference has been given to D.O letter dated 21.2.2014 of Advisor to Chief Minister, Khyber Pakhtunkhwa. He requested that the appeal may be accepted.

5. This appeal was resisted by learned counsel for private respondent No. 4 and learned Asstt. A.G for official respondents by stating that a civil servant, according to Civil Servants Act, 1973, is liable to serve anywhere in the province, therefore, the appellant cannot question the transfer order. It was further submitted that order of private respondent No. 4 from Bannu to Haripur was made on humanitarian grounds. It was also argued that respondent-department was competent to transfer the appellant even before completion of tenure on administrative ground. They requested that the appeal may be dismissed.

6. We have gone through the record which shows that transfer of the appellant from Bannu to Haripur vide order dated 06.3.2013 was a general posting/transfer order in which the appellant was posted in place of respondent No. 4. Unlike that stations of the appellant and respondent No. 4 were again changed inter-se vide impugned order dated 09.4.2014 on one ~~by~~ one basis. Undisputedly this impugned transfer order is much before completion of tenure of two years. If the impugned transfer order was made on humanitarian ground in

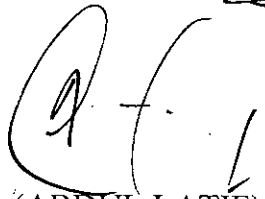
favour of respondent No. 4 the same would be illogical because the other has been made a scapegoat without hearing him. The appellant has also ^{given to} D.O letter No. Adv/CM/Prisons/2014/368, dated 21.2.2014, under the umbrella of which the impugned transfer order was passed by the then Inspector General of Prisons. On behalf of the respondent-department, no acceptable explanation of public interest was shown to the Tribunal which caused the impugned order. The impugned order is non-speaking and so also order of the appellate authority. For afore-stated reasons, the Tribunal is inclined to infer that the impugned order is liable to be set aside, but instead of directly setting aside the impugned order we have gone through the written comments of private respondent No. 4 wherein he has stated that he is the resident of District Abbottabad and his children are studying in different schools and that to take care of the entire family, he is the only male member. He also stated that the post of Office Assistant and office Superintendent are lying vacant in the Central Prison, Haripur and appellant can be adjusted against one of these posts. To take this reply of respondent No. 4 in view, we would refrain to directly interfere by setting aside the impugned order but would like to refer the matter to the competent authority to redress genuine grievances of the appellant and to give opportunity of personal hearing to the appellant as well as respondent No. 4 and to pass an appropriate speaking order, based on rationale according to spirit of the posting/transfer policy, without succumbing to



any political pressure, within one month of the receipt of this judgment, failing which the impugned order dated 09.4.2014 be deemed to have been set aside. Needless to say that in the circumstances of the case, order of appellate authority dated 17.7.2014 is set aside. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

06.7.2015.


(ABDUL LATIF)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

06.07.2015

Counsel for the appellant, Assistant AG with Sheryar, ASJ for the official respondents and counsel for private respondent No. 4 present. Arguments heard and record perused. Vide our detailed judgment of to-day and placed on file, this appeal is partially accepted as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCED

06.07.2015


MEMBER


MEMBER

03.04.2015

Appellant with counsel and Mr. Sheheryar Khan, ASJ alongwith Add: AG for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 10.06.2015.


Chairman

10.06.2015

Appellant with counsel, Mr. Sheheryar Khan, Asstt: Supdt Jail alongwith Mr. Ziaullah, GP for official respondents and private respondent No.4 in person present. Rejoinder on behalf of the appellant submitted. Private respondent No.4 submitted that his counsel is not come from Haripur and that the case may be adjourned. Since the matter of posting/transfer is involved therefore, last opportunity is given to private respondent No.4 to make available his counsel on the next date without fail. File to come up for arguments on 29.06.2015.


MEMBER


MEMBER

29.06.2015

Appellant with counsel (Mr. Ashraf Ali, Advocate), Assistant AG with Sheryar, ASJ for the official respondents and private respondent No. 4 with his counsel (Muhammad Jahangir Khan, Advocate) present. Arguments heard. During the course of arguments, a photocopy of complaint against the appellant vide letter dated 24.04.2014 from DPO Haripur address to Superintendent Central Prisons, Haripur presented by learned counsel of private respondent No. 4 about which the learned counsel for the appellant has reservation and stated that it cannot be filed without notice to the appellant. To come up for order on 06.07.2015.

Member


Member

05.03.2015

Appellant with counsel Asst: AG for official respondents No.1 to 3 and private respondent No. 4 in person present. Representative of the respondents requested for time to submit written reply/comments. To come up for written reply/comments on 19.03.2015.



Member

19.03.2015

Appellant with counsel, Asst: AG for official respondents No. 1 to 3 and private respondent No.4 in person present. Written reply/comments not produced by the respondents. Last opportunity granted. To come up for written reply/comments on 25.03.2015 before S.B.

Assistant Registrar
Process Fee
Bank
Member

25.03.2015

Appellant in person, Mr. Fazalullah, Assistant alongwith Addl: A.G for official respondents No. 1 to 3 and private respondent No. 4 in person present. Comments on behalf of private respondent No. 4 submitted. While learned Addl: A.G requested for adjournment. Last opportunity granted. To come up for written reply/comments on 3.4.2015 before S.B.



Chairman

Appeal No. 1059/2014
Mr. Nasir Ullah

6.

16.01.2015

Counsel for the appellant present. Preliminary arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned order dated 23.08.2014, vide which the appellant was transferred from Central Prison Haripur to Central Prison Bannu. Against the above referred impugned order appellant filed departmental appeal on 10.04.2014 which was rejected vide order dated 17.07.2014, hence the instant appeal on 11.08.2014. He further stated that the impugned transfer is pre-mature and politically motivated. Counsel for the appellant has also filed an application alongwith the appeal for suspending the operation of order dated 09.04.2014 and order dated 17.07.2014. Notice of application should also be issued to the respondents for reply/arguments.

Since the matter pertains to terms and conditions of service of the appellant, hence admit for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply. To come up for written reply/comments on main appeal as well as reply/arguments on application on 03.02.2015.

Appellant Deposited
Security & Process Fee
Rs. 250/- Bank
Receipt is Attached with File.

CS

Member

03.02.2015

Appellant with counsel and Mr. Majid Ghufan, private respondent No.4 in person with Mr. Kabirullah Khattak, Asst. Advocate General for official respondents present. Written reply on behalf of the respondents has not been received. The learned AAG requested for time to contact the respondents for submission of written reply/comments. To come up for written reply/comments on 05.03.2015.

Member

3.

18.09.2014

Clerk of counsel for the appellant present, and requested for adjournment. Request accepted. To come up for preliminary hearing on 17.11.2014.



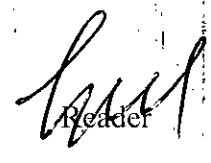
Member

4.

Reader Note:

17.11.2014

Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 30.12.2014 for the same.


Reader

5.

Reader Note:

30.12.2014



Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned 16.01.2015 for the same.


Reader

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1059/2014

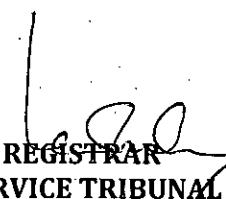
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	20/08/2014	<p>The appeal of Mr. Nasir Uddin resubmitted today by Mr. Ashraf Ali Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	25-8-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>18-9-2014</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Nasir Uddin Budget and Accounts Officer Central Jail Haripur received today i.e. on 11.08.2014 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Copy of rejection order of departmental appeal dated 17.7.2014 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 2- Appeal may be page marked according to the index.

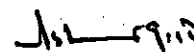
No. 1198 /S.T,

Dt. 12/8 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ashraf Ali Khattak Adv. Pesh.

Submitted
19.08.2014 = Re-submitted after compliance


Ashraf Ali

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

SERVICE APPEAL NO. 1059 /2014

Nasir Uddin S/o Alla- Uddin Budget &
Account s Officer, Central Jail Haripur
.....Appellant.

The Secretary Home & Tribal Affairs
Govt: of Khyber Pakhtunkhwa, Civil
Secretariat, Peshawar and
others.....Respondents

I N D E X

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of writ petition with Affidavit			1-9
2.	Copy of Relieving docket dated 29-11-2006 and transfer order dated 06-03-2013.		A	10-12
3.	Copy of Relieving docket and charge assumption report	25-06-2013 + 01-07-2013	B	13-14
4.	Copy of the impugned transfer order of respondent No.2	09-04-2014	C	15
5.	Copy of departmental representation		D	16-20
6.	Copy of Civil Suit and order		E	21-30
7.	Copy of impugned rejection order of respondent No.1	17-07-2014	F	31-35
8.	Wakalat Nama			36

Appellant

Through

Ashraf Ali Khattak

And

Nawaz Khan Khattak

Advocates, Peshawar

Cell:0332-9931676

Dated: ____ / 08/ 2014

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

SERVICE APPEAL NO. 1059 /2014

1061
11/8/2014

Nasir Uddin S/o Alla Uddin Budget & Accounts Officer, Central Jail Haripur
.....Appellant.

Versus

1. The Secretary Home & Tribal Affairs Govt: of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Inspector General of Prison, KPK, Peshawar.
3. The Superintendent Central Jail, Haripur.
4. Majid Ghufra Budget & Accounts Officer, Central Jail Haripur.
.....Respondents.

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED FINAL ORDER DATED 17-07-2014 OF THE RESPONDENT NO.1, PASSED ON THE DEPARTMENTAL APPEAL OF THE APPELLANT, WHEREIN HE MAINTAINED THE ORIGINAL ORDER OF RESPONDENT NO.2 DATED 09-04-2014 WITH THE PRAY THAT THIS HONOURABLE TRIBUNAL MAY GRACIOUSLY BE PLEASED TO SET ASIDE BOTH THE IMPUGNED ORDERS AND DIRECT THE RESPONDENTS TO ALLOW THE APPELLANT TO CONTINUE HIS JOB/DUTY AS BUDGET AND ACCOUNTS OFFICER AT CENTRAL PRISON, HARIPUR WITH ALL BACK BENEFITS.

Prayer:

On acceptance of the instant Service Appeal this Honorable Tribunal may graciously be pleased to declare the impugned transfer order No.9309 dated 09-04-2014 of the respondent No.2 and the Order of respondent No.1 dated 17-

submitted to
and filed.

20/8/14

07-2014 (Annexure-C & F) as political motivated, illegal, unlawful and without lawful authority and set aside the same and direct the respondents to allow the petitioner to continue his duty as Budget & Accounts Officer at Central Jail Haripur with all back benefits.

Respectfully Sheweth,

Facts giving rise to the present Service Appeal are as under:-

1. That Appellant has been serving as Budget & Accounts Officer in the respondent department. He has long standing service at his credit with unblemished and clean sheeted conduct record and never been rated as in-efficient and unqualified rather praised for excellent performance and job performance beyond the call of his duty.
2. That appellant after rendering service for about seven years at Central Prison, Bannu was transferred and posted to Central Jail, Haripur vide Order No.6648 dated 06-03-2013 and respondent No.4 (who had remained at Central Jail, Haripur for 08 years and was involved in extraneous means and was under report) posted at the place of the appellant. (Copy of relieving docket and transfer order dated 06-03-2013 has been attached as Annexure-A).
3. That in pursuance of the transfer order dated 06-03-2013; appellant shifted his family to Haripur, arranged family quarter, got/acquired admission of his kids over there and took over the charge of his assignment (Annexure-B) and delivered his services to the entire satisfaction of his superiors.
4. That now to the utter dismay and surprise, appellant has been subjected to premature impugned transfer order No.9309 dated 09-04-2014 (Annexure-) passed in pursuance of the DO letter of the Advisor to Chief Minister for Prison (Malik Qasim) Govt: of Khyber Pakhtunkhwa No. Adv/Prison/2014/368 dated 21-02-2014 and whereas respondent No.4 re-transferred to Central Jail, Haripur in place of appellant vide the same impugned order. The impugned order is self explanatory.
5. That it is pertinent to mention here that respondent No.4 is highly influential, he has secured his re-transfer to Central Jail, Haripur inspite of the fact that his original transfer to Central Jail, Bannu was carried out due to his involvement in extraneous


considerations and was under report, but he managed his re-transfer through political and extraneous means.

6. That being aggrieved from the impugned pre-mature transfer order dated 09-04-2013; appellant preferred departmental representation (Annexure-D) and also filed Civil Suit (Annexure-F). The Civil Suit has been returned back under Order 7 Rule 10 CPC for presentation to proper forum.
7. That by now the departmental representation has been decided by the respondent No.1 through his impugned one line/sentence rejection order dated 17-07-2014 (Annexure-E).
8. That now being aggrieved of both the impugned orders and having no other remedy; files the instant Service Appeal inter alia on the following grounds:

GROUNDS:-

- A. That appellant has not been treated by the respondents in accordance with law, rules and policy on the subject and thus violated Article 4 of the Constitution of the Islamic Republic of Pakistan, 1973. The very 1st Para of the Posting/Transfer Policy explains that all posting/transfers shall be in public interest and shall not be abused/misused to victimize the Government servants. In the instant case appellant has been victimized through the impugned pre-mature transfer order. Appellant has assumed his charge as Budget & Account Officer at Central Prison, Haripur on 1st, July, 2013 and now been re-transfer to Central Jail, Bannu before the completion of normal tenure i.e after 09 months and 08 days. On this score, this Honourable Tribunal has got the jurisdiction to interfere with and set aside the impugned order and direct the respondents to do the needful as per requirement of the law, rules and policy.
- B. That the 2nd Para of the Posting/Transfer Policy explains that all Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfer of their choice and against the public interest and more so in such a case, the Government servants pressuring the posting/transfer authorities for their choice posting are liable for departmental

disciplinary actions. In the instant case, respondent No.4 through the active facilitation of his political bosses secured his choice posting. Respondent No.4 has exerted political and administrative pressure for securing his choice posting and therefore, the impugned order is not only liable to be set aside, but he is also liable to be proceeded departmentally on the score of mis-conduct.

- C. That the Khyber Pakhtunkhwa Service Tribunal Act, 1973, and the rules made there under did not figure politicians anywhere. Transfer and Posting made under the directions of politicians are not sustainable in the eyes of law and Constitution. The impugned transfer order itself explain that it has been passed in pursuance of the directions of the Advisor to Chief Minister for Prison (Malik Qasim) Govt: of Khyber Pakhtunkhwa vide his DO letter No. Adv/Prison/2014/368 dated 21-02-2014. The Honourable Supreme Court has highly condemned such practices.
- D. That the impugned transfer order has been passed during ban period. The ban has been imposed by the Advisor to the Chief Minister by himself and he himself has violated its decision .
- E. That when the ordinary tenure for a posting has been specified in the law or rules made there under. Such tenure must be respected and cannot be varied, except for compelling reasons, which should be record in writing. In the instant case the tenure policy has been violated and no such compelling reasons recorded in writing. Reliance is placed on 2013 TD (S) 202/204= PLD 2013 SC 195 (h). In case of transfer the propose decision which deviates from the accepted or rule based norms without proper justification can be tested on the touch stone of a manifest public interest. [2013 TD (S) 178].
- F. That Transfer of a civil servant within a period of less than 09 months without explaining any exigency for such transfer would be violative of the law laid down by the Supreme Court of Pakistan that normal period of posting should be three years. The order was set aside holding that it adversely affects devotion, attachment and dutifulness of civil servants [2014 TD (service) 141].

- G. That in pursuance of the transfer order dated 06-03-2013; appellant has shifted his family to Haripur, arranged family quarter, got/acquired admission of his kids over there and now respondents are pressuring the petitioner to vacate the family quarter and shift his family. Appellant has recently admitted his kids at Haripur and at this stage, it is very harmful to immediately re-shift his family back to Bannu and to cancel his kids admission at Haripur and to re-admit them at Bannu. This act of respondent is highly un-desirable and unwarranted.
- H. That the impugned final order of respondent No.1 is against the provision of section 5 of the Khyber Pakhtunkhwa Appeal Rules, 1986 as no compliance of the said rule has been adopted by the appellate authority while dealing with the departmental appeal of the appellant and therefore, on this score alone the impugned order is liable to struck down.
- I. That appellant would seek the permission of this Honourable Tribunal to advance some more grounds at the time of hearing.

It is therefore, humbly requested that the instant Service Appeal may kindly be accepted as prayed for above.

Any other relief, which this Honourable Tribunal deem proper may also be graciously granted.

Appellant

Through

Ashraf Ali Khattak

And

Nawaz Khan Khattak
Advocates, Peshawar.

Dated: _____ / 08/ 2014

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. _____/2014

Nasir Uddin S/o Alla-Uddin Budget & Accounts Officer, Central Jail Haripur
Appellant.

Versus

The Secretary Home & Tribal Affairs Govt: of Khyber Pakhtunkhwa, Civil
 Secretariat, Peshawar and others..... Respondents.

Affidavit

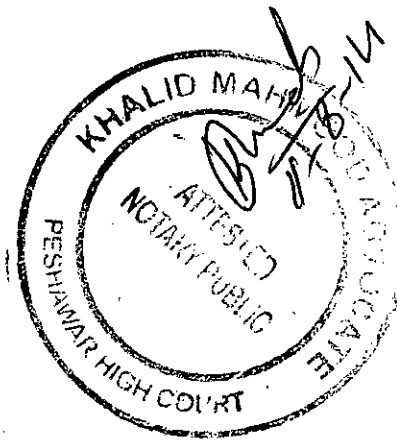
I, Nasir Uddin S/o Alla Uddin Budget & Accounts Officer, Central Jail Haripur, do hereby solemnly affirm and declare on oath that the contents of this Service Appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.

Identified by

Ashraf Ali Khattak

Ashraf Ali Khattak

Advocate, Peshawar



Nasir Uddin
 Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2014

Nasir Uddin S/o Alla-Uddin Budget & Accounts Officer,
Central Jail HaripurAppellant.

Versus

The Secretary Home & Tribal Affairs Govt: of Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar and others
.....Respondents.

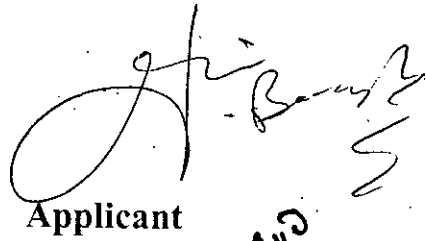
Application for suspending the operation of the impugned
order dated 09-04-2014 and Order dated 17-07-2014 till
the final disposal of the instant appeal.

Respectfully Sheweth,

1. That the above titled service appeal is being filed today which is yet to be fixed for hearing.
2. That the facts alleged and grounds taken in the body of main appeal may kindly be as an integral part of this application, which make out an excellent prima facie case in favour of the appellant.
3. That the balance of convenience also lies in favour of appellant and in case the impugned orders are not suspended the appellant will suffer irreparable loss.

It is, therefore, humbly prayed that on acceptance of this application, the operation of the impugned orders

dated 09-04-2014 and Order dated 17-07-2014 may graciously be suspended till the final disposal of the appeal.



Applicant

Through



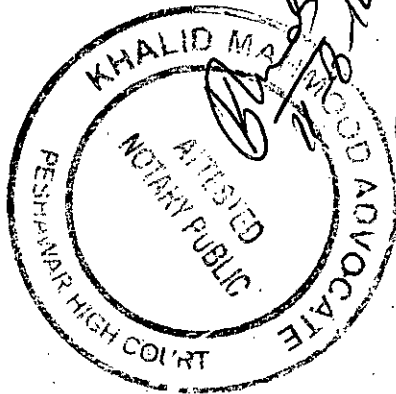
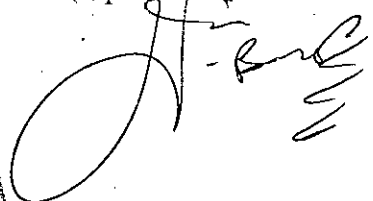
Ashraf Ali Khattak,
Advocate, Peshawar.

Dated: _____ / 08/ 2014

Affidavit

I, Nasir Uddin S/o Alla-Uddin Budget & Accounts Officer, Central Jail Haripur, do hereby affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent



Anx: A

10



OFFICE OF THE
INSPECTOR-GENERAL OF PRISONS,
N.-W.F.P., PESHAWAR.

Tele No. 9210937/9210334

No. 27/2-7-2004/20104

Dated 29-11-2006

To

Mr. Nasirud Din Bangash,
Assistant Head Clerk
O/O I.G Prisons NWFP Peshawar

Subject: - RELIEVING DOCKET.

Memo:

Under the instructions contained in the Inspector General of Prisons, NWFP Peshawar order No. 20070 dated 29-11-2006, you are hereby relieved of your duties at this office on after noon of 29-11-2006, and directed to report to the Superintendent Central Prison Bannu for further duties there.

You are allowed 3 (three) days joining time.

(SABIRZADA FAZLI RAHMAT)
ADMINISTRATIVE OFFICER
FOR I.G. PRISONS NWFP PESHAWAR

Endst. No. 20105-07

Copy of the above is forwarded to the:-

1. Superintendent Central Prison Bannu for information The Service Book and L.P.C of the Official will follow.
2. Accountant General NWFP Peshawar for information.
3. District Accounts Officer Bannu for information.

(SABIRZADA FAZLI RAHMAT)
ADMINISTRATIVE OFFICER
FOR I.G. PRISONS NWFP PESHAWAR

Attested

[Signature]
To be true copy
Advocate



(11)

OFFICE OF THE
INSPECTOR-GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA
Tel: 9210937/9210334

No. 6648

Dated 06-03-2013

ORDER

Following postings / transfers is hereby ordered in the public interest: -

- 1) Mr. Majid Ghufuran, Budget and Accounts Officer (BPS-16) attached to Central Prison Haripur is hereby transferred and posted in the same capacity to Central Prison Bannu Vice No.2.
- 2) ✓ Mr. Nasiruddin Bangash, Budget and Accounts Officer (BPS-16) attached to Central Prison Bannu is hereby transferred and posted in the same capacity to Central Prison Haripur Vice No.1 above.
- 3) Mr. Nasiruddin, Assistant (BPS-14) performing temporary duties at Central Prison Peshawar and for the purpose of pay is attached to Central Prison D.I.Khan is now hereby transferred and posted in the same capacity to Central Prison Haripur for all purposes against the vacant post.
- 4) Temporary attachment in respect of Mr. Javed Iqbal Assistant (BPS-14) with District Jail Mardan is hereby withdrawn and he is posted back to his parent Jail i.e Central Prison Bannu for all purposes.
- 5) Temporary attachment in respect of Mr. Fazal Ala, Senior Clerk (BPS-9) with Internment Center Lakki Marwat is hereby withdrawn and he is posted back to his parent Jail i.e Central Prison Bannu for all purposes.
- 6) Mr. Khadim Shah, Senior Clerk (BPS-9) attached to District Jail Mardan is hereby transferred and posted in the same capacity to District Jail Timergara vice No.7.
- 7) Mr. Muhammad Yar, Senior Clerk (BPS-9) performing temporary duties at Judicial Lockup Malakand and for the purpose of pay attached to District Jail Timergara is hereby transferred and posted to District Jail Swat for all purposes Vice No.8.
- 8) Mr. Irfanullah, Senior Clerk (BPS-9), performing temporary duties at District Jail Buner Daggar and for the purpose of pay attached to District Jail Swat is hereby transferred and posted to District Jail Kohat for all purposes Vice No.9.
- 9) Mr. Muhammad Ali, Senior Clerk (BPS-9), attached to District Jail Kohat is hereby transferred and posted to District Jail Swat vice No.10, however for the purpose of duty he is attached to District Jail Buner Daggar.
- 10) Mr. Aurangzeb, Senior Clerk (BPS-9), performing temporary duties at Judicial Lockup Nowshera and for the purpose of pay attached to District Jail Swat is now hereby transferred and posted in the same capacity District Jail Mardan for all purposes Vice No.6.
- 11) Mr. Akhtar Shah, Senior Clerk (BPS-9), attached to Central Prison Bannu is hereby transferred and posted in the same capacity to Central Prison Haripur against the vacant post.

Requested
to be true copy
Advocate



OFFICE OF THE
INSPECTOR-GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA
Tel: 9210937/9210334

No. _____

Dated 06-03-2013

- 12) Mr. Fazal Karim, Junior Clerk (BPS-07) attached to District Jail Timergara is hereby transferred and posted in the same capacity to Judicial Lockup Malakand Vice No.13.
- 13) Mr. Badshah Rehman, Junior Clerk (BPS-07) attached to Judicial Lockup Malakand is hereby transferred and posted in the same capacity to Judicial Lockup Nowshera Vice No.14.
- 14) Mr. Gul Dad, Junior Clerk (BPS-07) attached to Judicial Lockup Nowshera is hereby transferred and posted in the same capacity to District Jail Timergara Vice No.12.
- 15) Mr. Said Rahim Shah, Senior Clerk (BPS-9), temporary attached to District Jail Timergara may be relieved of his duties for his parent Jail i.e District Jail Swat on arrival of Senior Clerk at S.No.6 above.

- (i) Arrival and departure report should be sent to all concerned.
- (ii) All should be relieved immediately by making local arrangements.

Sd/-
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR.

Endst; No. 6649-72 /-

Copy of the above is forwarded to the: - ✓

- ✓ 1) Superintendents Central Prison Peshawar, Haripur, D.I.Khan and Bannu.
- 2) Superintendents District Jail Kohat, Buner Daggar, Swat, Timergara, Mardan.
- 3) Superintendents Judicial Lockups Malakand and Nowshera.
- 4) Incharge Internment Center Lakki Marwat.
- ✓ For information and necessary action.
- 5) Accountant General Khyber Pakhtunkhwa Peshawar for information.
- 6) District Accounts Officers, Haripur, D.I.Khan, Bannu, Kohat, Buner Daggar, Swat, Timergara, Mardan, Malakand and Nowshera.
- 7) Office Record Keeper for placing a copy of the said order in personal file of all concerned.

Attested

[Signature]
To be true copy
Advocate

[Signature]
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



OFFICE OF THE
SUPERINTENDENT
CENTRAL PRISON HARIPUR
No. 4753 /-
Dated 01-7-2013 /-

CHARGE ASSUMPTION REPORT

Under the instructions continued in the Inspector General of Prisons Khyber Pakhtunkhwa Province Peshawar Order No. 6648 dated 06-3-2013, I, Nasir-Uddin Bangash, Budget & Accounts Officer (BPS-16) do hereby assume the charge of the office of the Budget and Accounts officer at Central Prison Haripur today on the forenoon of 01/07/2013.

Specimen Signatures:

1- [Signature] 2- [Signature] 3- [Signature]

Attested.

SUPERINTENDENT
CENTRAL PRISON HARIPUR

No. 4754-56 / Dated:- 01/07/2013

Forwarded to:-

1. The District Accounts Officer, Haripur for information and necessary action please.
2. The Manager National Bank of Pakistan Main Branch, Haripur for information and necessary action please.
3. The Manager National Bank of Pakistan TIP Branch, Haripur for information and necessary action please.

Attested

[Signature]
To be true copy
Advocate

[Signature]
SUPERINTENDENT
CENTRAL PRISON HARIPUR

Personal copy
for future ref.



14

OFFICE OF THE
SUPERINTENDENT CENTRAL PRISON BANNU

NO. 4194 / DATED: 25.06.2013
TELE/FAX: 0928-633327

To,

✓
Mr. Nasir-Ud Din Bangash,
Budget & Accounts Officer,
Attached to Central Prison Bannu.

Subject: - **RELIEVING DOCKET.**

Memo:

Under the instructions contained in the Inspector General of Prisons, Khyber Pakhtun Khwa Province Peshawar Order No. 6648 dated 06.03.2013, you are hereby relieved of your duties at this Jail on the FN/AN of 25-6-13 & directed to report to the Superintendent Central Prison Haripur for further duty there.


You are allowed 10 days joining time.


SUPERINTENDENT
CENTRAL PRISON BANNU

Endst: No. _____

Copy forwarded to:-

1. The Inspector General of Prisons, Khyber Pakhtun Khwa Province Peshawar for information w/r to his order No. quoted above please.
2. The Superintendent Central Prison Haripur for information and necessary action please.
3. The District Accounts Officer Bannu & Haripur for information and necessary action please.

Attested

To be true copy
Advocate


SUPERINTENDENT
CENTRAL PRISON BANNU



Anx: C

(15)

507

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

NO. 9309

DATED 9-4-2014

ORDER

Following postings/transfers is hereby ordered in the public interest:-

S.No.	Name of Officer with BPS & designation.	From	To
1.	Mr.Majid Ghufraan, Budget & Accounts Officer (BPS-16).	Central Prison Bannu.	Central Prison Haripur vice No.2.
2.	Mr.Nasir-ud-Din Bangash, Budget & Accounts Officer (BPS-16).	Central Prison Haripur.	Central Prison Bannu vice No.1 above.

NOTE

- i. Arrival and departure report should be sent to all concerned.
- ii. Both should be relieved of their duties immediately by making local arrangement.
- iii. Minimum joining time may be allowed.

INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

ENDST; NO. 9310-14 : 1.

Copy of the above is forwarded to :-

1. The Superintendents, Central Prison Haripur & Bannu for information and necessary action.
2. The District Accounts Officers Haripur & Bannu, for information.
3. PS to Advisor to Chief Minister (For Prisons) Khyber Pakhtunkhwa for information with reference to DO letter No. Adv/ CM/ Prisons/ 2014/368 dated 21-2-2014

INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Attested

[Signature]
To be true copy
Advocate

Anx: D

(18)

To,

The Worthy Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar.

THROUGH: PROPER CHANNEL.

Subject:- REQUEST FOR CANCELLATION OF TRANSFER ORDER.

Respected Sir,

With great reverence I beg to refer to your office Order No. 9309-14 dated 09-04-2014 on the subject.

It is most humbly submitted that I am working as Budget & Accounts Officer (BPS-16) and presently attached to Central Prison Haripur.

I have been transferred from Central Prison Haripur to Central Prison Bannu vide your above referred office Order please.

It is submitted that I remained attached to Central Prison Bannu from 12/2006 to 06/2013. I delivered my services there for a very long period i.e. about 07 years & now I am performing my duties at Central Prison Haripur with great zeal & punctuality. Moreover, I admitted my kids in schools in recent session & incurred a huge amount on their admissions fee, uniforms, books etc.

Further, I have not yet completed my tenure of transfer & posting policy at Central Prison Haripur and I am not entitled to any T.A/D.A on eve of my transfer to Central Prison Bannu as I am a low paid Government servant and have a large family to support, so cannot forbear the transportation charges etc. Inter-alia to the above, I remained attached to Central Prison Bannu and I belong to Parachinar Kurram Agency & a number of prisoners^{of Kurram Agency} are confined therein due to which I apprehend life threats as well.

In wake of above humble submissions, it is most humbly prayed that my transfer order from Central Prison Haripur to Central Prison Bannu being against the standing transfer & posting policy as well as my remarkable services at Central Prison Haripur, may please be cancelled/withdrawn and obliged. If not so, I shall knock at the door of Hon'ble High Court for remedy.

I shall be very grateful to your this act of kindness and shall pray for your long life, progress and prosperity.

Thanking you in kind anticipation.

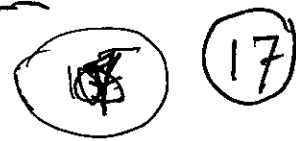
Yours most obedient servant,

(NASIR-UDDIN BANGASH)
Budget & Accounts Officer
Central Prison Haripur

10/04/2014

Dated:- 10-04-2014

Attested
[Signature]
To be true copy
Advocate



**OFFICE OF THE SUPERINTENDENT
CENTRAL PRISON HARIPUR**

No. 2460/WE /-
Dated 10-04-2014 /-

To,

The Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar.

Subject:-

**REQUEST FOR CANCELLATION OF TRANSFER ORDER
OF MR.NASIR-UDDIN BANGASH BUDGET & ACCOUNTS
OFFICER FROM CENTRAL PRISON HARIPUR TO
CENTRAL PRISON BANNU.**

Memo:

The contents of application of above named officer, are based on facts as he was working to the best satisfaction of the undersigned. Moreover, his transfer orders to Central Prison Bannu where he already served for more than 06 years and his present transfer is not only premature but also not in consonance & spirit of Justice and standing transfer/posting procedure/policy for such actions.

It is requested & recommended that decision may please be reviewed and his transfer orders may be cancelled/withdrawn in Public and in the interest of Justice.

Sd/-

**SUPERINTENDENT
CENTRAL PRISON HARIPUR**

Attested

[Signature]
**To be true copy
Advocate**

To, The Hon'ble Secretary to Government of Khyber Pakhtunkhwa,
Home & Tribal Affairs Department,
Peshawar.

Subject: - APPEAL FOR CANCELLATION OF TRANSFER.

96655
20/4/14

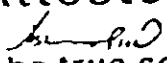
SOC PRISON

Respected Sir!

with great reverence I beg to bring into Your kind notice the matter of illegal transfer of the undersigned from central Prison Haripur to Central Prison Bannu, vide G.G. Prisons K.P.K Peshawar order No. 9309 dtd: 09-04-2014 (copy enclosed for ready reference please). The transfer order is purely against Merit, Justice & against the standing Transfer/Posting Policy as is evident from Superintendent Central Prison Haripur memo: No. 2460/WF dated 10-04-2014 & enclosed application of the undersigned (copies of both enclosed for ready ref: pl3:). I was transferred from central Prison Bannu to central Prison Haripur vide G.G. Prisons K.P.K Peshawar order No. 6648 dtd: 06-03-2013 (copy enclosed) & the same order has now been reviewed after the passage of just my 09 months stay at Haripur Jail as evident from my relieving docket vide Suptt: Jail Bannu memo: NO. 4194 dtd: 25-06-2013 & Charge Assumption Report vide No. 01-7-2013 (copies enclosed) which reveal that I have not yet completed my tenure at central Prison Haripur which is 02 years for settled areas vide Govt: of K.P.K Estab: Deptt: (Regulation wing) circular No. SOR-VI/ESAD/1-4/2008/vol-VII dtd: Pesh: 11-09-2009 (copy enclosed for ready ref: pl3:).

All the above submissions clearly speak that the transfer order in question is purely against merit,

(pl3: see page-2)

Attested

To be true copy
Advocate

Justice malafide as the undersigned has very transparent & clear/remarkable service record.

The undersigned is not entitled for any T.A/D.A due to less tenure at Haripur which is about 09 Months. Moreover, I recently admitted my kids in school for new session. Last but not least, I have already served in Central Prison Bannu for 06 $\frac{1}{2}$ years i.e since 12/2006 to 06/2013 my transfer back to Central Prison Bannu on Political influence as evident from CC: (3) P:5 to advisor to C.M. (for Prisons) KPK Lehman D.O letter No. Adv/CM/Prisons/2014/368 dtd: 21-02-2014 is quite unjustifiable as Minister is no authority for transfer/posting as the powers rest with G.G Prisons but the later unauthorisedly illegally obeyed the Political Pressure of the former & now I am suffering from great mental stress as I cannot bear/incur huge amount for shifting to Bannu with family & to re-admit my school going kids in Bannu. I am a low paid Government servant & I hope that Your honour will consider my appeal on Justice & Sympathetic grounds. I shall pray for your long life, Progress & Prosperity. I was on casual leave from 14-4-2014 to 16-4-2014 but the G.G Prisons Pressurised/compelled the Superintendent Jail for my relieving to pave the way for my predecessor for arrival & I was received from Central Jail Haripur on 16-4-2014 on the day I was on casual leave as evident from my enclosed casual leave application, but neither I have received my relieving Docket

(Pl: See = Page - 3)

Attested

[Signature]
To be true copy
Advocate

nor I have relinquished the charge & my predecessor Mr. Majid Ghifran has illegally & unauthorizedly reported arrival at Haripur Jail.

All Such actions have been done purely on Political Pressure & I, being a poor person & non-Political Government servant beg Your Honor's favour in the matter based on facts.

I pray Your Honor to kindly probe into the matter and issue necessary orders for Cancellation of above mentioned illegal transfer, in the best interest of Justice, Merit & Public.

Thanking You in kind anticipation.

Yours most obedient Servant,

N. Bangash

(NASIR-UDDIN BANGASH)
Budget & Accounts officer
(BPS-16)

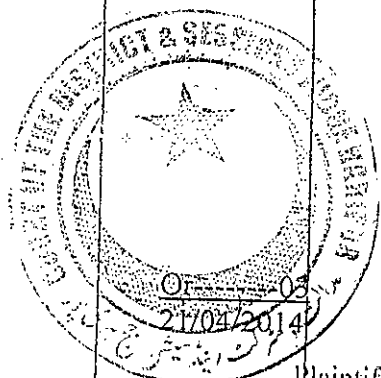
Quarter No. (16)
Central Jail Haripur KPK.
Cell: 0333-9343049

D/- 21-04-2014.

Attested
[Signature]
Advocate

IN THE COURT OF SENIOR CIVIL JUDGE,
HARIPUR

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other proceedings with signatures of Judge or Magistrate and that of parties or counsel where necessary
01	21-4-14 21-04-14	<p>Suit presented through counsel Mr. <u>Muhammad Shakir Adv.</u></p> <p>The same is hereby entrusted to the Court of <u>C.J.J.H.</u> for disposal. The learned counsel is directed to appear before the said Court on <u>Today</u></p> <p style="text-align: right;"><i>(Miss Hina Khan)</i> SENIOR CIVIL JUDGE, HARIPUR</p> <p style="text-align: center;">21.04.2014</p> <p style="text-align: center;">جہاں علی - درخت کئی دعویٰ الٹوا ہے مفتی - کتنے رٹاؤں پر دہلیا لیا ہے اور پھر مری ہے</p> <p style="text-align: right;">21/04 15 25/04 15</p> <p>Plaintiff alongwith counsel present and admits the contents of the plaint to be correct. It be entered in the relevant register. Alongwith the plaint an application for grant of temporary injunction is also annexed. Preliminary arguments heard. Learned counsel for the plaintiff was directed to inculcate this court whether the suit can be entertained by this court under Section 9 of the Civil Procedure Code as the matter in question pertains to transfer and posting of the Government servant for which the Services Tribunal has got the exclusive jurisdiction. In compliance thereof learned counsel for the plaintiffs cited the law laid in <i>HAKIM HAFIZ MUHAMMAD GHAUS VERSUS PROVINCE OF PUNJAB</i>, 1996 CLC 1382 Lahore and <i>AMAN ULLAH KHAN VERSUS PROVINCE OF N.W.F.P.</i>, MLD 1994 (Peshawar) 2329 and submitted that when the malafides are alleged the jurisdiction of civil courts can not be ousted. Perusal</p>



Attested
To be true copy
Advocate

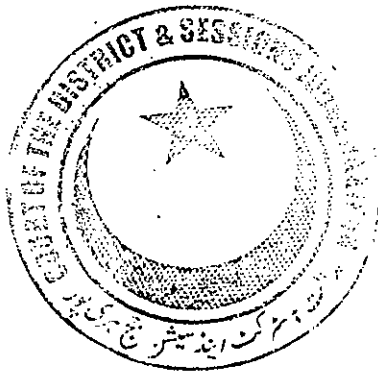
Attested to be true copy
Authorized Signature of
Canoon-21-04-14
Date
Examiner
Distt. & Session Judge
Haripur

22

Continued or-----03
21/04/2014

of the record reveals that malafides have been alleged in the instant suit. Further the letter of Superintendent Jail bearing No.2460/WE Haripur is self explanatory wherein he also termed the transfer order of the plaintiff premature against the rules and policy. Accordingly the impugned notification/ order bearing No.9309 dated 09/04/2014 is hereby suspended till date fixed. Notice be issued against the defendants for 25/04/2014.

AFTAB JAVED
Civil Judge-V 21-04-14
Haripur



Attested to be true copy
Authorized LIA of
Qanoon-e-Shahadat order; 197
Date 21-04-14
Examiner
Dist. & Session Judge
Haripur

No: 6024
Date of presentation of Application 21-04-14
No of Words 5280
Copying Fee Nil
Urgent Fee Nil
TGT Nil
Name of Plaintiff
Date of Filing 21-04-14
Date of Institution of 21-04-14
Date of Delivery of Co. 21-04-14

5512/12
CA
4900
31/04/14

کہدالت جناب سٹیٹ سول جج مہارہا پور

ناہر الدین بنگش ولد علاء الدین بنگش ساکن حال سٹرل جیل کالونہ
سٹرل جیل ضلع مہارہا پور (عدلی)

- بنام -

1 انسپکٹر جنرل جیل خانہ جات حیدرآباد پشاور

2 سپرنٹنڈنٹ سٹرل جیل مہارہا پور

3 پرنسپل (P.S) سیکرٹری ٹو ایڈوائزر ٹو چیف منسٹر ٹو پرنسپل

(Prison) حکومت حیدرآباد پشاور

4 ڈسٹرکٹ اکاؤنٹس (Distt Accounts) امیر مہارہا پور (عدلی)

دعویٰ استغرارہ بزرگ حصول ڈگری بدین قرار داد کہ عدلی بطور جٹ اینڈ

اکاؤنٹس (Budget & Account Officer) امیر حاکم جیل خانہ جات

(Prison Dept) میں بطور کماری ملزمہ ایسی خدمات سر انجام دے رہا ہے

عدلی یکم جولائی 2013 سے سٹرل جیل مہارہا پور میں بحیثیت جٹ اینڈ اکاؤنٹ

آفیسر تعینات ہے۔ عدلی مختلف قسم کی ریکورڈس کی بیکلیٹ یاد رکھ کر کوئی التزام و طرہ

(Allegations) نہیں ہے۔ عدلی ایسی قانونی مدت اسیفار پوسٹنگ ایسی وجود

تعمیناتی کی جگہ پر بوری کرنے کا قانوناً حقدار و مجاز ہے۔

اس کے برعکس مدعا علیہ عنوان حکومت کا صلح کردہ پوسٹنگ ٹرانسفر مابین

(Posting / Transfer) کے خلاف من عدلی کی ٹرانسفر امیر مہارہا پور ہے۔ جیٹ از پریسی

Attested

To be true copy
Advocate

(Relieve) چارٹ چھوڑنے پر چیورنگ مدعی کی تنخواہ وغیرہ بند کرنے دیکر کوئی اسٹری
و تادیبی کارروائی کے ستر تیز جواز و حقدار نہ ہیں
لیڈا آرڈر نمبر ۷ - 9309 مورخہ 9/11/94۔ فیہرہ مدعیہ نمبر 1/1994 بجابت ٹرانسفر و تبدیلی
من مدعی سر اسٹریٹ، خدو قانون و واقعات۔ منی بر مہینہ، سازشانہ، غیر جوازہ
پوشنگ انٹرنیشنل پالیسی کے برعکس منسکو جیم سے حقوق من مدعی پر غیر حوش، باطل، کالج
و قابل منوی ہے۔ مذکورہ غیر قانونی و غیر جوازہ آرڈر کی آرڈر من مدعی کو جبراً او
زبردستی و خدو قانون (Relieve) کروایا جا رہا ہے جو کہ مدعیہ علیہ اہم اہم بی
سر اسٹریٹ، غیر قانونی و غیر جوازہ ہے اور مدعیہ علیہ ایسا کرنے کے جواز نہیں۔

(Mandatory Injunction) بنام مدعیہ علیہ مذکورہ
غیر قانونی و غیر جوازہ حکم نامہ / آرڈر کی بنیاد پر مدعی کو جبراً، زبردستی و خدو قانون
Relieve کرنے۔ تنخواہ وغیرہ بند کرنے پر حکم کے عمل درآمد بائزر ہیں۔
صدر در حکم انتہائی دواغی طور پر داد نہیں مسئلہ بنام مدعیہ علیہ مذکورہ مدعی کو غیر قانونی
و غیر جوازہ طور پر ٹرانسفر کرنے، زبردستی و جبراً چارٹ چھوڑنے اسکی تنخواہ وغیرہ بند
کرنے سے علی الامداد منع و بائزر ہیں۔

فائل نمبر کورٹ فیس و اختیار سماعت عدالت = 2000/2004

جناب عالی! معنونہ مدعیہ کوئی ذیل عرض ہے

1۔ یہ کہ من مدعی حکمہ جیل خانہ جات (Prison Dept) میں بطور کامی ملازم
بجٹ اینڈ اکاؤنٹ آفیسر کے طور پر خدمات سر انجام دے رہا ہے۔ مدعیہ ایک
عسفی، فرض شناس اور دیانتدار آفیسر ہے جس کے خدو کسی قسم کی انکو آفیسر
اور کمپلائنٹ وغیرہ نہیں۔

2۔ یہ کہ من مدعی کو مورخہ 29/11/08 کو سروس علی نامہ / 2004-27/2-2004 فیہرہ مدعیہ نمبر 1/1994

Attested
To be true copy
Advocate

19. P. Misra vs. State of Bihar, AIR 1963 SC 1275. مدعی کو B.P.S. 16 سے B.P.S. 16 میں ترقی و بطور جیٹ اینڈ اکاؤنٹ آفیسر بیوٹل جیل میں تعینات کیا۔ بیوٹل لف نہیں۔

3. یہ کہ مدعی کو صرف 63/613 کو بیرونی صحیح نام پر 6648 انسپیکٹر جیل جوائنٹ پشاور سٹرل جیل بیوٹل بطور جیٹ اینڈ اکاؤنٹ آفیسر سٹرل جیل میں ترقی پزیر کیا گیا جبکہ سٹرل جیل میں ترقی پزیر کے اندر ریورٹ جیٹ اینڈ اکاؤنٹ آفیسر کو بیوٹل جیل میں تبدیل کیا گیا۔ مدعی کو صرف 25/613 پر 4194 سٹرل جیل بیوٹل ترقی پزیر کی گئی (Relieve) اور ریورٹ جیٹ اینڈ اکاؤنٹ آفیسر کے بطور جیٹ اینڈ اکاؤنٹ آفیسر میں ترقی پزیر ہوا۔ (سپرٹیمانڈ ریورٹ جیٹ اینڈ اکاؤنٹ آفیسر کے بطور جیٹ اینڈ اکاؤنٹ آفیسر میں ترقی پزیر ہوا۔)

4. یہ کہ عدالت نے حکم نامہ تبادلہ جاری کرتے ہوئے حکومت کی وضع کردہ موجودہ ٹرانسفر / پوسٹنگ پالیسی کے اصول و قواعد و ضوابط کو تسلیم کیا اور مدعی کو حقوق کا بالکل لحاظ نہیں کیا کہ اس میں Premature ٹرانسفر کی صورت میں مدعی کو کتنا نقصان ہو رہا ہے۔ ٹرانسفر / پوسٹنگ پالیسی کے مطابق کہ جس کی کوری ملڈرنگ کو دو سال کے لیے Settled ایسٹ میں سرورس کی صورت میں تبدیل نہیں کیا جاسکتا ہے۔ من مدعی نے حال ہی میں نئے تعلیمی سال کے آغاز میں بیوٹل جیل میں ترقی پزیر ہوا اور ان کے کوری اور پوسٹنگ کے بارے میں جس پر ایک کثیر رقم ہوئی جو کہ ایک معمولی ملڈرنگ کے وجود سے متعلق ہے۔

حکم نامہ میں مذکور مبنی بر بدینتی، غلط استدلال اور واقعات، سہ کارگی ملڈرنگ کی پوسٹنگ / ٹرانسفر پالیسی کے اصول و ضوابط کے خلاف، قانون و انصاف کے تقاضوں کے خلاف ہو سکتا ہے جو حقوق مدعی پر غیر حشر، باطل، نالگہ اور قابل منسوخ ہے۔ ہرگز نہ قابل عمل و قابل بحالی ہے۔ بلکہ قابل منسوخ و قابل استرداد ہے۔ (ٹرانسفر / پوسٹنگ پالیسی کو عدالت نے)

Attested
The true copy
Advocate

5 یہ کہ عدلیہ محکمہ نے بھی عدلیہ محکمہ کے حکم نامہ کو قانون و اقصاء کے تحت لیا گیا ہے۔
مذکورہ بالا کی صورت میں عدلیہ محکمہ کے فیصلے پر عدلیہ محکمہ کے فیصلے کو قبل از
pre-mature قرار دیا گیا ہے۔ مذکورہ حکم نامہ عدلیہ محکمہ پر نظر ثانی / منسوخ کیا گیا ہے۔

6 یہ کہ من مہمک حورم 14/4 کو مذکورہ حکم نامہ کے تحت جواز اتحادی اور عدلیہ محکمہ کے
بامیں حکمانہ ایمل دائر کی ہے جو کہ عدلیہ محکمہ کے بنیادی قانونی حق ہے جس پر بحال
اتحادی نے کوئی صلح ہمارے نہیں کی ہے اور عدلیہ محکمہ پر برسر / دباؤ ڈالنا جارہا ہے کہ
عدلیہ کو خود آزر دیا جائے جسے اور صرف قانون اسکی ڈیوٹی ہے (Relative) کروا کر متبادل
آدمی کو جواز دیں عدلیہ محکمہ کا یہ فعل سراسر غلط ہے۔ غیر قانونی اور غیر جواز ہے جس
سے اس کو منع دیا جائے مطلوب ہے۔ (سفارشات پیشہ نہیں عمل پر پورے ڈیپارٹمنٹل ایمل

7 یہ کہ عدلیہ حورم 14/4 سے 16/4 تک اپنے ایک معاملہ (کونو لٹا لٹا ہوا ہیں)
کے سلسلہ میں صوبائی تختب اعلیٰ پستادری کے بامیں پیرسل Hearing کے سلسلہ میں
چھٹی پر تھا۔ اگر اس دوران عدلیہ محکمہ کوئی اقدام متروک کیا گیا ہو تو وہ غلط ہے عدلیہ محکمہ کو
(فعل در خواست سے لے کر)۔

8 یہ کہ عدلیہ محکمہ نے غیر قانونی و غیر جواز حکم نامہ تبادلہ کو منسوخ کرنے کا حقد دیا ہے عدلیہ محکمہ
کیا ممکن ہے عدلیہ محکمہ کو سیاسی دباؤ کے تحت مال موکل رہا ہے اور عدلیہ محکمہ کو غیر قانونی
طور Relative کروا کر پھینکا ہے جس کے بنائے جاگت یہ ایسی عدلیہ محکمہ
بنا کر تیار ہے۔

9 دعویٰ خیر انتر ہمداد ہے اور عدلیہ محکمہ کی دعوئی کو اختیار سماعت حاصل ہے۔ مالیت مقدم
مگر عدلیہ محکمہ کو اختیار سماعت عدلیہ محکمہ کی دعوئی میں درج ہے۔ دعوئی کو عدلیہ محکمہ سے قبل

10 اس کے علاوہ کہ دعویٰ عدلیہ محکمہ کے حسب استدعا مقدمہ عدلیہ محکمہ کی دعوئی بحق عدلیہ محکمہ کے
ڈگری کرنا چاہیے اور عدلیہ محکمہ کے عدلیہ محکمہ کے دعوئی کو عدلیہ محکمہ کے
عدلیہ محکمہ کے عدلیہ محکمہ کے عدلیہ محکمہ کے عدلیہ محکمہ کے عدلیہ محکمہ کے
(P.T.O)

Attested
To be true copy
Advocate

(27)

کمال

المرفوع 21/54
574

ناصر البرزنجی بنکشی و لکچر ڈائری بنکشی
(مدنی) بنزیر لکچر فریڈ

Signature: Nasser Banzaji

Khalid Khan
Acho.

تصدیق: بااقرار صحیح سبباً جو تکمیل رائی بالہ پروفیسر عزیز محمد صاحب ماسٹر بنکشی
میں درسیت میں اور کمال اور کمالی از منہ اللہ صواب میں دیکھا جائے

المرفوع 21/54
574 مطبوعہ حوالہ پور

ناصر البرزنجی بنکشی

Signature: Nasser Banzaji

نوٹ: یہ فریڈس کو ان دعوای میں درج ہے

21/54
574

Signature: Nasser Banzaji

لقد الت جناب سید سہیل سول جی صاحب لہری پور

ناصر الدین بنگش ولد علی و الدین بنگش حال سید جیل قانونی کھیل
وضلع لہری پور

- بنام -

انسٹیٹیوٹ جیل لہری پور صاحبان عدالت جیل لہری پور، سید سہیل سول جیل لہری پور
ڈسٹرکٹ اکاؤنٹ اینٹروپورٹ

درخواست نمبر اردو درجہ امتحان فارسی بہ صدف و علی کہ وہ سید قانونی و سید جیل لہری پور
تبادلہ کی آڑ میں مدعی اسٹیل کو زبردستی جیل آصف قانونی (Relive) کرنے
اسکی نتیجہ و سید بہر کرنے دیگر سید قانونی کا و ای سے دفعہ بازار میں سید نامہ مقدمہ
حکے نامہ تبادلہ نمبر یہ عدلیہ نمبر 1. نمبر 9309 و دفعہ 09/05/04 کو عدالت لہری پور

جناب عالی! دعویٰ درخواست لہری پور

یہ کہ دعویٰ ختم ادائیگی کر رہے ہیں کہ اللہ صوابہ حکمی کامیابی سے قوی احکامات
میں دوسری مدعی Prima facie

یہ کہ وہ علی سید قانونی و سید جیل لہری پور حکم نامہ تبادلہ کی آڑ میں اسٹیل / مدعی کو جیل لہری پور
زبردستی و صدف قانونی Relive کرنے میں جبر سے ایسا کرنے سے تجاوز نہیں

یہ کہ حکم نامہ تبادلہ سید نہ کرنے کی صورت میں اسٹیل / مدعی کو ناقابل تلافی نقصان
کا اندیشہ ہے۔ اسٹیل لہری پور اور لہری پور Low paid ملزم ہے۔ ان تمام لہری پور و لہری پور
کا مفصل نہیں ہے۔ ڈسٹرکٹ سول کورٹ لہری پور

اسٹیل کہ لہری پور درخواست ختم نامہ تبادلہ کو سید و لہری پور علی کو سید
بالترتیب احکامات سے نامہ مقدمہ دفعہ و بازار لہری پور و لہری پور

ادویہ قانونی و لہری پور

المحقق 21/04/04

Attested
To be true copy
Advocate

نصر الدین بنگش
Advocate

ناصر الدین بنگش
Sahib

(29)

Final No.
Order

بسم الله الرحمن الرحيم
حلفاً بيننا وبينكم وانما بالله درو اهد خدا
ما بعد من علم و لیس من درو اهد خدا
عبدالستار صحرانی رکنی

المرفوع 21/54
874

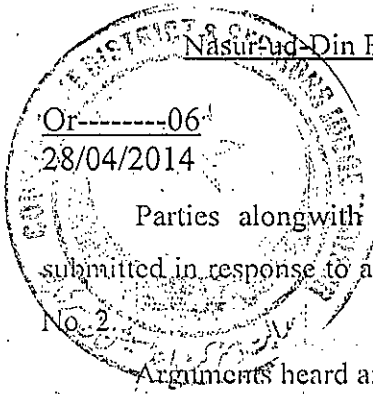
ناظم الدین بنکس

30
28/4/2014
2014
112/2014

IN THE COURT OF AFTAB JAVED, CIVIL JUDGE-V, HARIPUR.

Case File No. 112/1

Nasir-Ud-Din Bangash Vs Inspector General Jail Khanajaat



Or-----06
28/04/2014

Parties alongwith their counsel present. Reply on behalf of plaintiff submitted in response to an application for return of the plaint filed by defendant

No. 2.

Arguments heard and record perused.

Learned counsel for the applicant/defendant No 2 submitted that this court has got no jurisdiction even the malafides are alleged in view of the law laid in 2005SCMR17. On the other hand learned counsel for the respondent/plaintiff cited 1996CLC1382 Lahore and 1994MLD2029 Peshawar with PLD1959 (West Pakistan) Peshawar106.

Although the plaintiff has alleged malafides in his plaint on the part of defendants and in view of the law held in 1996CLC1382 and 1994MLD2029, the jurisdiction of the Civil Court cannot be ousted but the honorable Apex court has declared that even the transfer order if malafide and made for extraneous consideration to accommodate some blue-eyed chap, then matter would squarely fall within jurisdictional domain of Service Tribunal. Citation-D of the same law held in SECRETEY EDUCATION NWFP PESHAWAR AND TWO OTHERS VERSUS MUSEAMIR KHAN AND ANOTHER 2005SCMR17, provides that Service Tribunal would have jurisdiction to interfere and set-aside the malafide order of Departmental Authority. The learned counsel for the respondent/plaintiff could not brought any contrary view of the Honorable Apex court to the cited one.

In view of the above discussions, the plaint is hereby returned to the plaintiff who is at liberty to file the same before proper forum if he desires so. Moharrir is directed to return the original plaint to the plaintiff in accordance with law. Application accepted. Status quo already granted stands vacated.

File be consigned too record room after its completion and compilation.

Announced
28/04/2014

AFTAB JAVED
Civil Judge-V.
Haripur

28-04-2014

No. 6293
Date of presentation of Application 29-04-14
No of Words 03 Page
Copying Fee Nil
Type of Paper Nil
Date of Copy 29-04-14
Date of Delivery of Copy 29-04-14

Attested to be true copy
Authorized 112/17 of
Qanoon-e-Shahadat order, 198
Date 29-04-14

Examiner
District & Sessions Judge
Haripur

Attested

be true copy
Advocate



Ann: F (31)
Government of Khyber Pakhtunkhwa
Home & Tribal Affairs Department

No. SO(Prisons)-HD/1-30/2014 /Vol-XII
Dated Peshawar the 17th July, 2014

To

The Inspector General of Prisons,
Khyber Pakhtunkhwa, Peshawar.

Subject: - APPEAL FOR CANCELLATION OF TRANSFER ORDER

Dear Sir,

I am directed to refer to your letter No. 16504-WE dated 18/06/2014 on the subject noted above and to state that after going through appeal of Mr. Nasir-ur-Din Bangash, Budget & Account Officer (BPS-16) the competent authority has directed to file the case.

Yours faithfully,

(Rahmat Ali Wazir)
SECTION OFFICER (PRISONS)

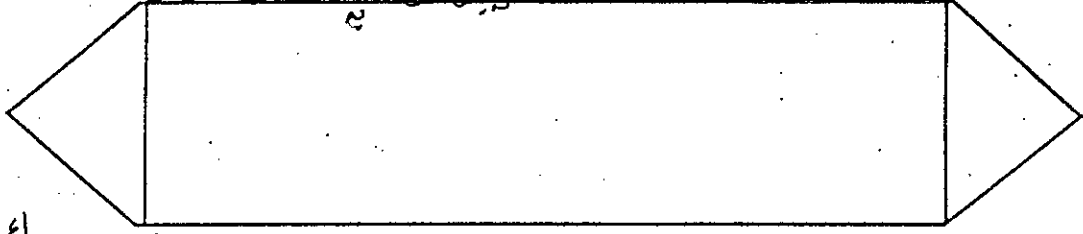
Endst: of even No/date

Copy forwarded for information to the:

1. PS to Special Secretary Home Khyber Pakhtunkhwa Peshawar.
2. Master File.

SECTION OFFICER (PRISONS)

بعدالت سروس ٹریبونل پینٹ اور



نامہ محمد امین 2014ء پنجاب مسائل
نامہ امین بنام ہوسٹس سکیٹری

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام پینٹ اور کیلئے اشرف علی شاہک، ایڈووایٹ نواز خان خٹک
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک ور و پیرا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر این پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم _____ ماہ _____ 2014ء

واہ العبد _____

کے لئے منظور ہے۔

بمقام

M. A. M.

Accepted
Attested

2/1/2014

21303-2259972-9

Very Imp (1) (23)

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 856 P of 2012

Amal G

Inamullah S/o Said Afzal (Forester)
Peshawar Forest Division, Nowshera.....Petitioner

V E R S U S

1. Divisional Forest Officer, Peshawar
Forest Division, Peshawar
2. Chief Conservator of Forest-I,
KPK, Peshawar
3. Conservator Forest,
Southern Circle, Peshawar
4. Secretary Environment,
Govt of KPK, Peshawar
5. District Coordination Officer, Nowshera
6. Hamayun S/o Inayatullah
Forester Peshawar, Forest Division, Peshawar..... Respondents

PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973 FOR DECLARATION/ ORDER
TO THE EFFECT THAT THE IMPUGNED ORDER
OF RESPONDENT NO.2 DATED 01.03.2012 BE
DECLARED AS ILLEGAL, BASED ON
POLITICAL INTERFERENCE AND IS THUS
LIABLE TO BE STRUCK DOWN.

ED TO JAY

Registrar

MAR 2012

Attested

To be true copy
Advocate

SHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

(26)

Court of.....

Case No.....of.....

Serial No. of Order of Proceedings	Date of Order of Proceedings	Order or other Proceedings with Signature of Judge.
1	2	3
	<p>ORDER 29.03.2012</p>	<p><u>Writ Petition No.856-P/2012 with Interim Relief.</u></p> <p>Present: Mr. Muhammad Ijaz Khan, Advocate, for Inamullah, petitioner.</p> <p>*****</p> <p><u>MIFTAH-UD-DIN KHAN, J.-Inamullah,</u> petitioner herein, through the instant constitutional petition, has questioned the order dated 01.03.2012, passed by respondent No.2, whereby, he has been transferred from Peshawar Forest Division to District Government Nowshera.</p> <p>2. The learned counsel appearing on behalf of the petitioner contended that when the order has been passed under the influence of the Provincial Minister for Environment, it cannot be said to have been passed either in the public interest or in the exigencies of service, therefore, interference of this Court would be rather imperative and even indispensable, the more-so, when the Provincial Minister is also pitched against</p>


Handwritten initials

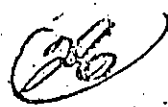
Attested
Handwritten signature
To be true copy
Advocate.

him in the arena. Alternate remedy, the learned counsel added, being a rule of procedure and not of law can't limit or restrict the jurisdiction of this Court in the cases of this nature.

3. We have gone through the available record carefully and considered the submissions made by the learned counsel for the petitioner.


4. We agree with the learned counsel for the petitioner that the Provincial Minister has no power to interfere with posting and transfer of civil servants but since in view of the judgments rendered in the cases of Miss Rukhsana Ijaz vs. Secretary, Education, Punjab & others (1997 SCMR 167); Ayyaz Anjum vs. Government of Punjab, Housing and Physical Planning Department through Secretary and others (1997 SCMR 169); Rafique Ahmad Chaudhry vs. Ahmad Nawaz Malik & others (1997 SCMR 170); Secretary Education NWFP, Peshawar and 2 others vs. Mustamir Khan & another (2005 SCMR 17) and Peer Muhammad vs. Government of Baluchistan through Chief Secretary & others (2007 SCMR 54), posting and transfer being related to the terms and condition of service can well be urged before the departmental


 Attested
 To be true copy
 Advocate



authority in the first instance and then before the Service Tribunal, this Court, while exercising its jurisdiction under Article 199 of the Constitution of Islamic Republic of Pakistan, can't step-in. This is what this Court held in the cases of Bakhtiar Ahmad vs. SMBR in W.P.No.1167 of 2006 decided on 03.08.2006; Professor Rehana Matiullah vs. Chief Secretary & others in W.P.No.1496 of 2006 decided on 12.02.2006; S. Mansoor Hussain Shah vs. Secretary LG/RD in W.P.No.1153 of 2006 decided on 03.08.2006; Waqif Khan Vs. Government of N.W.F.P. in W.P.No.1114 of 2006 decided on 28.07.2006; Pervez Khan vs. Addl. Chief Secretary FATA in W.P.No.2261 of 2006 decided on 14.02.2007; Serat Bibi vs. Government of NWFP in W.P.1559 of 2006 decided on 05.10.2006; Abdal Qadir vs. Government in W.P.No.561 of 2006 decided on 12.05.2006; Nawab Gul vs. SMBR in W.P.No.1033 of 2006 decided on 18.07.2006; Sardar Ali vs. Director Schools in W.P.No.942 of 2006 decided on 13.07.2006 and Muhammad Ilyas Khan vs. District Revenue and Estate Officer and others in W.P.No.835 of 2007 decided on 23.05.2007.

Attested


To be true copy
Advocate

5. In the case of Zahid Akhtar vs. Government

27

of Punjab through Secretary, Local Government and Rural Development, Lahore & 2 others (PLD 1995 SC 530), the Hon'ble Supreme Court in spite of condemning the phenomenon of passing orders of transfer and posting of civil servants on the dictates of the elected representatives, dismissed the petitions questioning such orders by observing as under:-

"We need not stress here that tamed and subservient bureaucracy can neither be helpful to Government nor it is expected to inspire public confidence in the administration. Good governance is largely dependent on an upright, honest and strong bureaucracy. Therefore, mere submission to the will of superior is not a commendable trait in a bureaucrat. Elected representatives placed in charge of administrative departments of Government are not expected to carry with them a deep insight in the complexities of administration. The duty of a bureaucrat, therefore, is, to apprise these elected representatives the nicety of administration and provide them correct guidance in discharge of their functions in accordance with the law. Succumbing to each and every order or direction of such elected functionaries without bringing to their

hllr
Attested
hllr
To be true copy.
Advocate

notice, the legal infirmities in such orders / directions may sometimes amount to an act of indiscretion on the part of bureaucrats, which may not be justifiable on the plane of hierarchical discipline. It hardly needs to be mentioned that a Government servant is expected to comply only those orders/ directions of his superior, which are legal and within his competence. Compliance of an illegal or an incompetent direction/order can neither be justified on the plea that it came from a superior authority nor it could be defended on the ground that its non-compliance would have exposed the concerned Government servant to the risk of disciplinary action."

Another paragraph also merits verbatim reproduction, which reads as under: -

"A reading of rule 21 (2) with Schedule V of the Rules of Business *ibid*, makes it clear that the transfer of a Section Officer/ Under-Secretaries and other officers of equivalent rank within the department is to be done by the Secretary of that department. Rule 21 of the Rules of Business, which deals with power of posting, promotion and transfer of Government servants, does not contemplate exercise of these

Alk.
Attested
[Signature]
To be true copy
Advocate

powers by the Minister. The normal period of posting of a Government servant at a station, according to the above referred policy decision of the Government, is 3 years, which has to be followed in the ordinary circumstances, unless for reasons of exigencies of services mentioned in the aforesaid policy of Government, a transfer before expiry of 3 years' period becomes necessary, in the opinion of competent Authority. The transfer orders in the present case, therefore, could neither be justified on the plane of policy directive of Government referred to above, nor they were sustainable on the language of Rule 21 (2) read with Schedule V of the Rules of Business, *ibid*. We are in no doubt that if the transfer orders in the case before us would have been made in accordance with the policy directives of the Government referred to above and power was exercised by the competent Authority as contemplated by Rule 21 (2) read with Schedule V of the Rules of Business, *ibid*, there would have been no room for maneuvering by the officers affected by such transfer. The fact that the transfers were made in violation of policy directive of the Government, which has the status of a Rule, and provisions of Rule 21 (2) *ibid*, were not

H. W.

Attested
[Signature]
 To be true copy
 Advocate

followed strictly, opened the door for the Government servant concerned to bring in outside influences to obtain the desired transfers. We are also sorry to note that the Secretary LG & RD, neither resisted these unethical and undesirable moves of his subordinates nor he pointed out to the Hon'ble Minister Incharge, that the transfer orders made by him from time to time in respect of various officers of his department were neither in conformity with the declared policy of government nor these transfer orders conform to the provisions of Rule 21 (2) of the Rules of Business, *ibid*. It was the duty of the Secretary LG & RD to have pointed out to the Minister concerned the extent of his authority in such matter, besides bringing to his notice that such frequent transfer of a Government servant could neither be justified as the exigencies of service nor it could be described in the Public interest. We are constrained to observe that such unconcerned and lukewarm attitude on the part of a Head of a Government is not expected to promote discipline or efficiency in the Department. On the contrary such attitude may have a demoralizing effect on his subordinates encouraging to seek intervention and favours of outside agencies, which may ultimately

Hls
Attested

hls
To be true copy!
Advocate

adversely affect the overall discipline and efficiency in the department. We, therefore, expect that the guide lines mentioned in the policy directives of the Government referred to above and the provisions of Rule 21 of the Rules of Business, *ibid*, will be kept in view by all concerned while dealing with the transfers of Government servants. The office is directed to send a copy of this judgment to the Government of Punjab for circulating it to all its departments, for future guidance. With these observations, this petition stands dismissed as not maintainable."

6. It is shocking to note that the Government functionaries, despite clear-cut directives of the apex Court, pass orders of posting and transfer by behaving like pawns and playthings in the hands of Ministers, MNAs and MPAs, who have nothing to do with such matters in view of the provisions contained in Article 129 of the Constitution. It is now high time to adhere to the letter and spirit of law and constitution to ensure good governance in the province, if at all it is something to be cherished. However, we, while disposing of this writ petition, treat it as representation before the departmental authority and direct the office to send it to the authority concerned i.e. Secretary

L.Ht

Attested
[Signature]
 To be true copy
 Advocate

Environment, Peshawar, for decision in accordance with law / rules / policy / on merits within fifteen days. In the meantime, the operation of the impugned order, in light of the judgment of the apex Court rendered in 1999 SCMR 2538, shall remain suspended. This writ petition, thus, stand disposed of.

Announced.
29. 03. 2012

[Signature]
JUDGE

[Signature]
JUDGE

Nisil
[Signature]
30/3

Attested
[Signature]
To be true copy
Advocate

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. **1059 of 2014**

Nasir-ud-Din V/S Secretary KPK etc.

SERVICE APPEAL

WRITTEN COMMENTS ON BEHALF OF RESPONDENT NO.4

Most Respectfully Sheweth:-

Respondent No. 4 submits written comments graciously as under:-

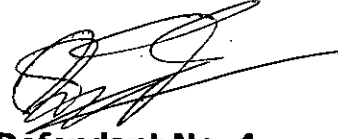
1. That the respondent No. 4 served in Central Prison Haripur honestly with hard work up to the entire satisfaction of high-ups. The high-ups passed remarks about the respondent as honest & hard working in annual performance evaluation report. The remarks passed by the petitioner about the respondent in appeal are highly condemnable and against the ground realities "**Annexure-A**".
2. That the respondent No. 4 is resident of District Abbottabad and children are studying in the schools. The respondent No. 4 is only male member of family and has to take care of ailing old mother two younger sisters and family comprising of wife and four children. There is no any other male member in family who has to take care of ailing mother for medical checkup. The treatment record is annexed as "**Annexure-B**".
3. That the appellant belongs to Para Chinar and family of the appellant is settled in Peshawar whereas the appellant's elder son is also studying in Peshawar College and residing

25.03.11

with grandparents. The post of Office Assistant and Office Superintendent are already vacant in Central Prison Haripur and appellant can be adjusted on any post out of already two vacant posts. The appellant has instituted instant appeal malafidely and personal grudges against Respondent No.4 and can easily be adjusted on any vacant post of ministerial staff in Central Prison Haripur in his own pay scale

4. That the appellant has already taken the charge at Central Prison Bannu and respondent No. 4 has assumed the Charge at Central Prison Haripur and functioning to the satisfaction of high-up.

Dated: _____



**Defendant No. 4
Majid Ghufuran
Budget & Account Officer
Central Prison Haripur**


Through Counsel

**Muhammad Jahangir Khan
Advocate High Court/
Federal Shariat Court**

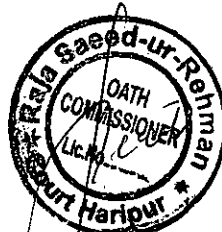
AFFIDAVIT

I, Majid Ghufuran s/o Muhammad Nawaz Khan, Budget & Account Officer, Central Prison Haripur do hereby solemnly affirm and declare on oath that the contents of written comments are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Court.

Dated: 25-03-2015



**Deponent
Majid Ghufuran
Budget & Account Officer
Central Prison Haripur**



24.3.15

**POWER OF ATTORNEY
(WAKALATNAMA)**

IN THE KPK SERVICE TRIBUNAL PESHAWAR

MASTR - ud - DIN

[Plaintiff
[Appellant
[Petitioner
[Complainant
[Decree Holder

Versus

SECRETARY ICPC etc.

[Defendant
[Respondent
[Accused
[Judgment Debtor

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____ fixed for _____

I/We the undersigned do hereby nominate & appoint MR. MUHAMMAD JAHANGIR KHAN ADVOCATE HIGH COURT / FEDERAL SHARIAT COURT to be counsel in the above matter for me/us on my/our behalf to appear, plead, act and answer in the above court transferred in the above matter, and to sign and filed petitions, statements, accounts exhibits compromises or other documents whatsoever. In connection with the above matter or any matter arising there from, and also to apply for and receive all documents or copies or copies of documents, deposition etc., and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment of other execution warrant or order and to conduct any proceeding that may arise there out and to apply for and receive payment of any of all sums or submit the above matter to arbitration, and to employ any other legal practitioner authorizing him to exercise the power and authorities hereby conferred on the advocate whenever he may think fit to do so.

And to do all acts legally necessary to manage and conduct the said case in all respect, 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 these parents or of the usual practice in such matter.

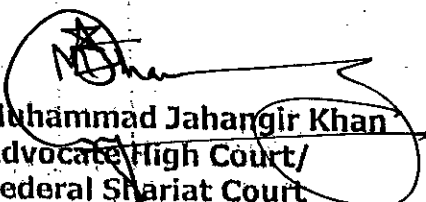
PROVIDED always, that, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same, and by I hereby agree that in the event of the whole or any part of the fee agreed by me to be paid to the advocate remaining unpaid he shall be entitled withdraw from the prosecution of the said cause until the same is paid.

IN WITNESS whereof I / We have hereto signed at _____ the _____ day of _____ in the year 2014 Executants/Executant signed and delivered.

Accepted subject to the terms regarding fee.


EXECUTANTS/EXECUTANT

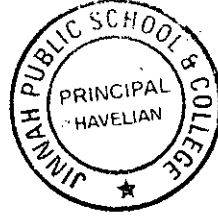
RESPONDENT No 4
MAJID GHUFRAN.


Muhammad Jahangir Khan
Advocate High Court/
Federal Shariat Court
Practicing at Haripur
Cell # 0302 5471190

Annex - B

Certificate

It is certified that Ahmad Nawaz s/o Majid Ghufan is bonafied resident of Village Chamnaka, District Abbottabad, Tehsil Havelian is a student of 1st class in Jinnah Public School, Havelian.



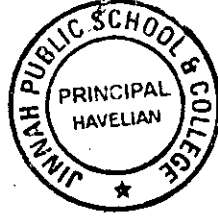
Mr. [Signature]


Principal
Jinnah Public School Havelian,
District Abbottabad.

Anex-B.

Certificate

It is certified that Barira Ghufran D/o Majid Ghufran is bonafied resident of Village Chamnaka, District Abbottabad, Tehsil Havelian is a student of 7th class in Jinnah Public School, Havelian.

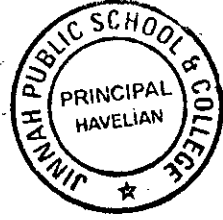




Principal
Jinnah Public School Havelian,
District Abbottabad.

Certificate

Annex-B

It is certified that Easha Fatima D/o Majid Ghufraan is bonafied resident of Village Chamnaka, District Abbottabad, Tehsil Havelian is a student of 5th class in Jinnah Public School, Havelian.




Principal
Jinnah Public School Havelian,
District Abbottabad.

Annex-8

ALI AMMAR GENERAL HOSPITAL & INFERTILITY CENTRE

Mansehra Road, Mandian Abbottabad, Pakistan

Phone: 0992-383508 Mob: 0321-9802731

Prof. Dr. Aziz-un-Nisa Abbasi
Gynaecologist

M.R.C.O.G. (London), F.C.P.S., D.G.O., M.C.P.S. (Pakistan)
(Gold Medalist) Diploma in Assisted
Reproduction (UK)
(Infertility)

**Head of Obstetrics &
Gynecology Department**

Ayub Medical Collage &
Ayub Teaching Hospital (Complex)
Abbottabad Pakistan

اوقات کار: 3-5 بجے

ایمر جنسی 24 گھنٹے صرف پہلے سے رجسٹرڈ مریضوں کے لئے

ناغہ بروز ہفتہ + اتوار

04/01/12

Name: Parveen Akhtar W/O, D/O: Mohd. Nawaz (late) Age 60 years

Parity: _____ Occupation: House-wife
Widow - 36 years.

Presenting Complaints

- ① Postmenopausal - 3yrs.
- ② Pressure Perineum - 3yrs.
- ③ Pain Epigastrium.

Past History

Family History

Menstrual History:

Obstetrical History:

Pulse: 86/min Temp: — B.P: 120/80

Heart: ✓

Chest: ✓

P/A: _____ PV: cytore-1/Reclote

Investigation HB%: 12.8 G/dl Blood Group: A+ive

Blood Sugar: 154 mg/dl Urine R/E: _____

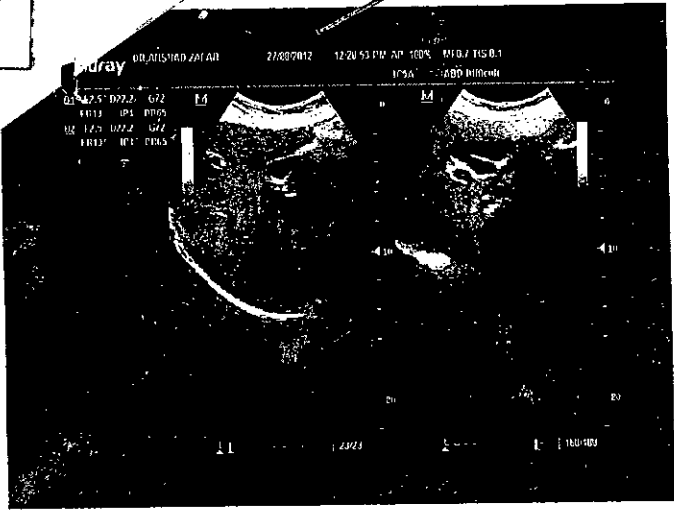
Others: _____
Hbs }
Hcc } -ive

Ultrasound:

WAD

Diagnosis: _____

Amber-A



ID REPORT

PPLEER ULTRASOUND

je _____ Sex _____ Date 27 Aug

o focal defects such as mass, ' Cyst or abscess

ltra-haptic biliary channel are not dilated

Right & Left Diaphragmatic excursions are normal

✓ **COMMON BILE DUCT:** Is not dilated (diameter 3mm)

GALLBLADDER: Size is normal Wall thickness in normal Ultrasound guided palpation over the galibladder is not tender	No sludge in the lumen No cacluli in the lumen
--	---

✓ **VESSELS:** Inferior Vena Cava, Hepatic Veins, Protal Vein and aorta are of normal diameters and appearances.

SPLEEN: Size is normal.	Parenchymal texture is normal. No focal defects.
--------------------------------	--

✓ **PANCREAS:** Size is normal. Texture is normal. no focal defects

RIGHT KIDNEY: Size is normal. Position in normal. No focal defects Parenchymal texture is normal Parenchymal thickness in normal	Contour and outline is normal No calculi within the kidney No hydronephrosis No pelvi-Calyceal dilatation
--	--

LEFT KIDNEY: Size is normal. Position in normal. No focal defects Parenchymal texture is normal Parenchymal thickness in normal	Contour and outline is normal No calculi within the kidney No hydronephrosis No pelvi-Calyceal dilatation
---	--

URINARY BLADDER:	Full	No calculi
Wall thickness		Post-micturition Bladder Urine Volume= (Within normal limits)

PROSTATE:	(In male) Size Normal	Texture is normal
Weight		No Focal defects

UTERUS: (In Females) Lumen Empty	RIGHT OVARY: Not Enlarged Not Cystic
Normal Size Normal Texture No focal defects or fibroids	LEFT OVARY: Not Enlarged Not Cystic

INTESTINES:

TESTIS	
Right	Left

No other abnormal mass, cyst or fluid collection is seen in the abdomen, pelvis or thorax.

COMMENTS:

Normal study

A

Thanks for referral
Dr. Arshad Zafar
 FOR FEEDBACK
 Mob: 0333-5040556

Annex: B

TESTIS
Right
Left

SUB TEACHING HOSPITAL, LABORATORIES ABBOTTABAD

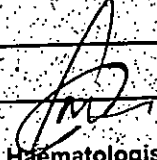
Name of Patient: Payveen Age: _____ Sex: Female
Ward/OPD: OPD Lab No: 56 Date: 27/8/2012

HEMATOLOGY

TEST	RESULT	NORMAL VALUES	TEST	RESULT	NORMAL VALUES
Hb		M: 13-18 F: 12-16 g/dl	TRBC		M: 4.5-5.5 Million/mm ³
TLC	<u>6900</u>	4000-11000/cmm	PCV		M: 40-50% F: 36-40%
ESR		mm1st hr (W.G)	MCV		83-101F
Platelets		(150-400) x 10 ¹ cmm	MCH		27-32pg
Retic		0.5-2.5%	MCHC		31.5-34.5 g/dl
DLC			B.T		2-7 min
Polys		40-80%	C.T		5-10 min
Lymphos		20-40%	P.T		11-16 sec
Monocytes		2-10%	APTT		30-40 sec
Eosinophils		1-6%	INR		2.0-3.0
Basophils		<1-2%	MPS		

RBC Morphology _____

Remark _____


Haematologist

Annex-B.

**Frontier
Laboratory**

Mob: 0300-9117339

فرنٹیر لیبارٹری

Doctor's Plaza Opp: Ayub Hospital Complex, Abbottabad ڈاکٹر پلازہ بالمقابل ایوب ہسپتال کیمپلکس ایبٹ آباد

Clinical Pathologist: **Dr. Muhammad Sajjad** M.B.B.S, DC Path, FCPS

Incorrect Results: Please contact the Lab within 24 hours for free repetition of any blood test

Name: PERVEEN AKHTAR

Sex: FEMALE

Age: ** Years

Referred By: O.P.D

Date: 27/08/12

Time: 11:55:21

Investigation Req'd: BLOOD FOR H.PYLORI TEST

No.

1792

TEST REPORT

H- PYLORI----- POSITIVE

TEST PERFORMED BY 3RD GENERATION
IMMUNO CHROMATOGRAPHIC ASSAY.


Signature

Amex-B

**Frontier
Laboratory**

Mob: 0300-9117339

فرنٹیر لیبارٹری

Doctor's Plaza Opp: Ayub Hospital Complex, Abbottabad ڈاکٹر پلازہ بالمقابل ایوب ہسپتال کمپلیکس ایبٹ آباد

Clinical Pathologist: **Dr. Muhammad Sajjad** M.B.B.S, DC Path, FCPS

Incorrect Results: Please contact the Lab within 24 hours for free repetition of any blood test

Name: PARVEEN AKHTAR

Sex: FEMALE

Age: */* Years

Referred By: O.P.D

Date: 27/08/12

Time: 11:55:47

Investigation Req'd: Serum Amylase

No.

774

TEST REPORT

Serum Amylase ----- 112 U/L

Ref: Range upto 90


Signature



AYUB TEACHING HOSPITAL, ABBOTTABAD

Filter Out Patient Department

2980

Book No.

S. No. 085

Patient ID:

Patient Name:

Patient Age:

Patient Sex:

Patient Date & Time:

Patient Mode:

OPD:

Address:

IDP Status:

Amount:

ڈاکٹر بلال

CPS

od test

ars

5:47

774

Abd

Abdominal gas (flatulence)

vomiting
pre epist. 7 PM

7B

tender epigast.

ESOPH

Tab ~~River~~ - young

1 روز انہ کے ساتھ - 1

Tab Amoxil - 1g
15 - 1 + 1 + 1

Tab Clarid - 250 mg
15 - 1 + 1

Tab thevegram Ultra.
1 روز انہ کے ساتھ (3)

S. amylase

Abd user

- TLC

- H. pylori

MPD
28/8/14

ڈاکٹر شیر ایوب
ایم بی بی ایس، ایم بی اے
سی ایم او، ایوب چنگ ہسپتال، ایبٹ آباد

سرور سرچیکل اینڈ جنرل ہسپتال و میڈیسنی ہوم

Annex- 5

سر جن ڈاکٹر غلام سرور ملک
ایم بی بی ایس، ایف سی پی ایس (سرچیکل اسپیشلسٹ)
ڈاکٹر جنید سرور ملک
ایم بی بی ایس، ایم سی پی ایس (گولڈ میڈلسٹ)
نیولوئی آئی ڈی یو، ایم ایس یو پی انٹرنسلسٹ
میڈیکل اینڈ چائلڈ اسپیشلسٹ
(ایوب چنگ ہسپتال، ایبٹ آباد)
لیڈی ڈاکٹر انیقہ جنید
ایم بی بی ایس، آر ایم بی، ایم ایس یو پی
ماہر امراض زنانہ و انٹرنسلسٹ
(ایبٹ آباد، ایبٹ آباد)

ایمر جنسی 24 گھنٹے



ڈاکٹر روڈ، حویلیاں
فون: 0992-810932
0321-9823985
0313-5961547

ای سی سی - جی - انٹرنسلسٹ، ایکس رے
لیبارٹری، لیبر روم، آپریشن تھیٹر
اور داخلگی مکمل سہولیات موجود ہیں

جی ٹی روڈ حویلیاں

فون: 0992-810532

Patients Name: سرور ایوب اختر Age: _____ Date: 09.05.19

Rx

10-6-03

7H20

12H20

12H20

Tab. Benin 10 10

10

10

Handwritten signature/initials

Tab. Isocin 10 10

Handwritten notes and signatures

Clinical Record

Weight

55kg

B.P

120/70

Temp

←

Pulse

←

Calomox Tab
375mg, 625mg, 1gm

Ciplinz Tab
250mg, 500mg

A D I L



Annex - B

INCORRECT **LT?**
Please Contact Lab With in 24 Hours
For Free Repetition of Any Blood Test

CLINICAL LABORATORY

Mansehra Road Mandian Abbottabad. Mob: 0331-9094502

Parveen Akhter

4/1/19

Blood Ubi — 12.8 g/dl

R-12-16

Blood Sugar — 154 mg/dl

R.80 — 160

Blood Group R. — B (Positive)

HbsAg — Negative

Hsv — Negative

Lab incharge

11
GASTROENTEROLOGY AND LIVER CENTRE

Annex B

امراض معدہ، آنت، جگر سنٹر

پروفیسر

Professor

Dr. Alam Zeb Manan

M.B.B.S, M.R.C.P, F.R.C.P

Consultant Physician / Gastroenterologist
Ayub Teaching Hospital Abbottabad

Professor and Head Dept. Of Gastroenterology and
Liver Diseases Ayub Medical College, Abbottabad

Clinic: With Gastroscopy and Colonoscopy Facility
Shafiq Medical Centre, Abbottabad. Ph: 0992-382582

ڈاکٹر عالم زیب مٹان

ایم بی بی ایس، ایم آر سی پی، ایف آر سی پی
کنسلٹنٹ فزیشن انماہر امراض معدہ، آنت، جگر

ایوب ٹیچنگ ہسپتال ایبٹ آباد

پروفیسر و سربراہ علم الامراض معدہ، آنت

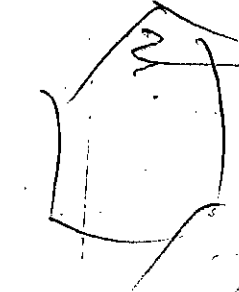
ایوب میڈیکل کالج ایبٹ آباد

کلینک: تشخیصی باامراض معدہ کیلئے جدید مشینری کی سہولت

شقیق میڈیکل سنٹر فون: 0992-382582

Paracetamol

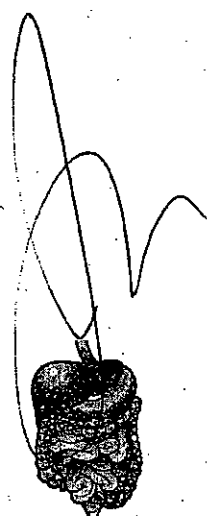
SB Achre



1) Aspirin 1 tab 20 mg
1/1/1
1/2/1

2) Calcium 1 tab 1+1
1/1/1

3) Sulcare 1 tab 1+1
1/1/1



GASTROENTEROLOGY AND LIVER CENTRE

Annex-B

امراضِ معدہ، آنت، جگر سنٹر

پروفیسر

ڈاکٹر عالم زیب مٹان

ایم بی بی ایس، ایم آر سی پی، ایف آر سی پی
کنسلٹنٹ فزیشن ماہر امراضِ معدہ، آنت جگر

Professor

Dr. Alam Zeb Manan

M.B.B.S, M.R.C.P, F.R.C.P

Consultant Physician / Gastroenterologist
Ayub Teaching Hospital Abbottabad

Professor and Head Dept. Of Gastroenterology and
Liver Diseases Ayub Medical College, Abbottabad

ایوب ٹیچنگ ہسپتال ایبٹ آباد

پروفیسر و سربراہ علم الامراضِ معدہ، آنت

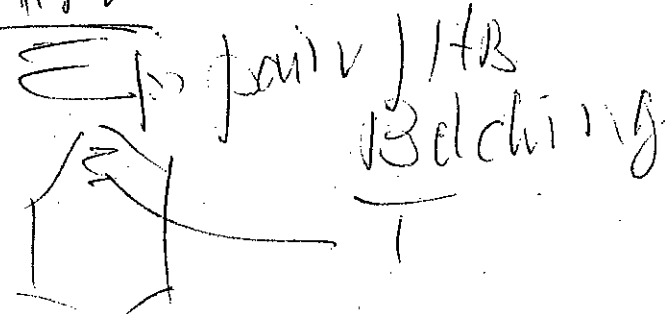
ایوب میڈیکل کالج ایبٹ آباد

کلینک: تھیسس امراضِ معدہ کیلئے جدید مشینری کی سہولت

شفیق میڈیکل سنٹر فون: 0992-382582

Clinic: With Gastroscopy and Colonoscopy Facility
Shafiq Medical Centre, Abbottabad. Ph: 0992-382882

Prescription



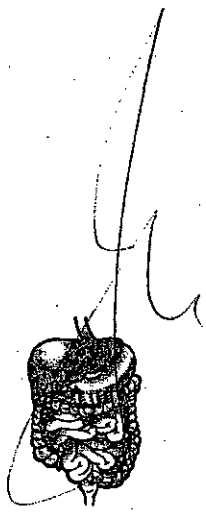
1) Esol Tabs 40mg

گہرا آنت دوا

2) Colenticon Syrup
1-2-2

3) Salcare Tabs 1-1-1

4) Motival Syrup 2-1-2



AYUB TEACHING HOSPITAL, LABORATORIES ABBOTTABAD

Annex - B

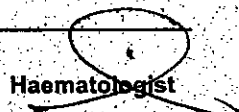
Name of Patient: Farveen Akhter Age: _____ Sex: F
 Ward/OPD: GBW/114 Ad. No. 124/39 Date: 27/8/12

HEMATOLOGY

TEST	RESULT	NORMAL VALUES	TEST	RESULT	NORMAL VALUES
Hb	<u>9.8</u>	M: 13-18 F: 12-16 g/dl	TRBC		M: 4.5-5.5 Million/mm ³
TLC	<u>2,500</u>	4000-11000/cmm	PCV		M: 40-50% F: 36-40%
ESR		mm1st hr (W.G)	MCV		83-101F
Platelets		(150-400) x 10 ⁶ cmm	MCH		27-32pg
Retics		0.5-2.5%	MCHC		31.5-34.5 g/dl
DLC			B.T		2-7 min
Polys		40-80%	C.T		5-10 min
Lymphos		20-40%	P.T		11-16 sec
Monocytes		2-10%	APTT		30-40 sec
Eosinophils		1-6%	INR		2.0-3.0
Basophils		<1-2%	MPS		

RBC Morphology _____

Remark _____


 Haematologist

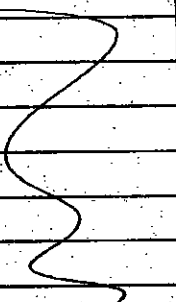
AYUB TEACHING HOSPITAL, LABORATORIES ABBOTTABAD

Name of Patient: Farveen Akhter Age: _____ Sex: _____
 Ward/OPD: AMB-166 Lab No. 124/139 Date: 27/8/12

URINE EXAMINATION

PHYSICO CHEMICAL ANALYSIS	
* COLOUR	<u>P. Yellow</u>
* TURBIDITY	
* SEDIMENT	
* pH	<u>6.0</u>
* SPECIFIC GRAVITY	
* GLUCOSE	<u>Tr</u>
* ALBUMIN	<u>Tr</u>
* KETONES	
* BILIRUBIN	
* UROBILIAGEN	
* BLOOD	
* BILE SALT	PIGMENT

MICROSCOPIC EXAMINATION	
* PUS CELLS	<u>02-03</u>
* RED BLOOD CELLS	<u>0-01</u>
* EPITHELIAL CELLS	<u>few</u>
* BACTERIA	
* CRYSTALS	
* CASTS	
* PARASITES	


 SIGNATURE

AYUB TEACHING HOSPITAL, LABORATORIES ABBOTTABAD

Amex-3

Name of Patient: Parveen Akhtar Age: _____ Sex: _____
 Ward/OPD: Orw.B/14 Lab No. 124/39 Date: 27/08/12

HEMATOLOGY

TEST	RESULT	NORMAL VALUES	TEST	RESULT	NORMAL VALUES
Hb		M: 13-18 F: 12-16 g/dl	TRBC		M: 4.5-5.5 Million/mm ³
TLC		4000-11000/cmm	PCV		M: 40-50% F: 36-40%
ESR		mm1st hr (W.G)	MCV		83-101F
Platelets		(150-400) x 10 ¹¹ cmm	MCH		27-32pg
Retics		0.5-2.5%	MCHC		31.5-34.5 g/dl
DLC			B.T		2-7 min
Polys		40-80%	C.T		5-10 min
Lymphos		20-40%	P.T	<u>17 sec</u>	11-16 sec <u>14 sec</u>
Monocytes		2-10%	APTT	<u>36 sec</u>	30-40 sec <u>32 sec</u>
Eosinophils		1-6%	INR		2.0-3.0
Basophils		<1-2%	MPS		

RBC Morphology

Remark

Haematologist

AYUB TEACHING HOSPITAL, LABORATORIES ABBOTTABAD

CHEMICAL PATHOLOGY

Name of Patient: Parveen Age: _____ Sex: _____
 Ward / OPD: 90B/14 Lab No. 124/35 Date: 27/8

TEST	RESULT	REF VALUES	TEST	RESULT	REF VALUES
Glucose (F)		4.02-6.0	Protein		g/l 66-87
Glucose (R)	<u>6.0</u>	mmol/l up to 10.0	Albumin		g/l 38-50
Urea	<u>4.0</u>	mmol/l 1.7-8.3	Globulin		g/l
Creatinine	<u>67</u>	umol/l M 53-97 F 44-90	T. Bilirubin		umol/l Upto 17
Uric acid		umol/l M 202-416 F 140-340	Bilirubin (direct)		umol/l Upto 4.5
Calcium		mmol/l 2.12-2.75	Bilirubin (indirect)		umol/l
Phosphorous		mmol/l 0.87-1.45	ALK Phosphates		U/L 53-279
Sodium		mmol/l 135-145	ALT/GPT		U/L M upto 40 F upto 31
Potassium		mmol/l 3.5-5.5	GOT		U/L M upto 37 F upto 31
Cholesterol		mmol/l 2.5-6.4	LDH		U/L 150-450
Triglyceride		mmol/l 0.4-2.0	CPK		U/L M 24-195 F 24-170
HDL Chol		mmol/l 0.83-2.5	Amylase		U/L Upto 90
LDL Chol		mmol/l up to 4.0	Acid Phos		U/L
Urine Volume		/24 hour			
Urine Protein		/24 hour			
Cret Clearance		ml/min			

Reporting Pathologist

Investigation chart

Asymptomatic

GYNAE 'B' WARD

Adum Amylase - 112 u/L

LABS	Date	Date	Date
Blood Group	Atr		
HB%	11g/dl		
Urea	4 mmol/l		
Sugar @	6 mmol/l		
HBs Ag	+		
Anti HCV	-		
Platelets	-		
Creatinine	67 umol/l		
LTF's			
Bilirubin			
ALT			
AST			
S. Na +			
S. K +			
S. Uric Acid			
P.T	17/14		
APTT	36/39 sec		
Urine R/E			



ANNEX-B

AYUB TEACHING HOSPITAL, LABORATORIES ABBOTTABAD

Name of Patient: Parveen Akhter Age: _____ Sex: _____

Ward / OPD CBW Lab No. 121/16 Date: 27/08/12

SEROLOGY / IMMUNOLOGY

- BLOOD GROUP
 - PREGNANCY TEST (Urine)
 - RHEUMATOID FACTOR (RA FACTOR)
 - ANTI NUCLEAR FACTOR (A.N.F)
 - C-REACTIVE PROTEIN (C.R.P)
 - MANTOUX TEST
 - Anti DNA
 - V.D.R.L. TEST
 - WIDAL TEST
 - Salmonella TO
 - Salmonella TH
 - Salmonella AO
 - Salmonella BO
- (Significant titre:-1:80 and above at 1 week's interval)

- (Hbs Ag) Negative
- ANTIBODIES H.C.V Antibodies Negative
- HIV ANTIBODY TEST Negative
- ICT TB IgG IgM
- ANTISTREPTOLYSION-O-TITRE (ASOT)
- TOXOPLASMA AGGLUTINATION TEST
- BRUCELLA AGGLUTINATION TEST
- Brucella Abortus Brucella Mallitensis
- D. Dimer Normal Range (1:2) dilution < 200mg/ml
- FDF Normal Range (1:2) dilution < 05mg/ml
- PSA
- H. Pylori
- Typhi-Dot IgG IgM
- Dengue Virus IgG IgM

Comments

SIGNATURE

CWB114
 Add#
 Parveen Akhter
 Add# → 124/16

Blood GP

Dr

27/8/12

Annex - B

ہومیو لیڈی ڈاکٹر مسز ہمایوں

D.H.M.S, R.H.M.P, F.M.T

ماہر امراض زنانہ و بچگانہ

ہومیو ڈاکٹر محمد ہمایوں یعقوب (گولڈ میڈلسٹ)

ایم اے، ڈی ایچ ایم ایس، بی ایچ ایم ایس

ڈسٹرکٹ ہومیو فزیشن، ڈی۔ ایچ۔ کیو۔ ہاسپٹل ایبٹ آباد

☆ کالم نگار روزنامہ آج ایبٹ آباد ☆ نامہ نگار ماہنامہ خواتین میگزین ہفت روزہ الشیاء لاہور

☆ مرکزی سیکرٹری اطلاعات اسلامک ہومیو پیتھک میڈیکل ایسوسی ایشن پاکستان

☆ Ex - لیکچرار حویلیاں ہومیو پیتھک میڈیکل کالج

موبائل: 0334-8981851 فون رہائش: 0992-810055

اوقات: صبح 10 تا 12 بجے دن

CLINICAL NOTES

B.P. 140/100

Temp 98.4 F

Pulse 82

Weight

C/o

Name Farween Akter Age 8yr Sex F Date 3/3/2010

اوقات ہاسپٹل صبح 8 تا 1 بجے دن ☆ کلینک: ظہر تا مغرب ٹوٹ: دور کے حضرات فون پر پہلے وقت میں

✓ Nutritional tda 1 + 1 + 1

✓ Nutri-D-3 sup. 2 + 2 + 2

✓ Alfatora sup. 2 + 2 + 2

Dacord ulin tda 2 + 2 + 2

P Linex drops. 15 + 15 + 15

Gastric tda 2 + 2 + 2

✓ Enoxifit tda 2 + 2

فون: 0992-811240

تاسم شدہ 1998

جرمنی اور فرانس کی ادویات دستیاب ہیں

خدمت کے 12 سال

ڈاکٹرانہ روڈ حویلیاں

البتدر ہومیو کلینک اینڈ سٹور

390

ہمارے ہاں پتھری، بواسیر، موٹاپا، جھوٹا تھ، شوگر، السر، زنانہ و مردانہ پوشیدہ امراض کا شافی علاج کیا جاتا ہے۔

ہومیو لیڈی ڈاکٹر مسز ہمایوں

D.H.M.S, R.H.M.P, F.M.T

ماہر امراض زنانہ و بچگانہ

اوقات: صبح 10-12 بجے دن

CLINICAL NOTES

B.P. 120/80

Temp 98.6°

Pulse 82

Weight

Clo

0992-810055 فون رہائش: 0334-8981851 موبائل

اوقات ہسپتال صبح 8 تا 1 بجے دن
☆ کلینک: ظہر تا مغرب
نوٹ: دور کے حضرات فون پر پہلے وقت لیں

Name Perveen Age 45 Sex F Date 25/3/2010

B.M. 12. $10 + 10 + 10$

B.M. 215 $10 + 10 + 10$

Gas cup. 1+1

P. digestive. 2+2+2

Alfortone sup. 2+2+2

Beano R 1295

Beano 215 33

Gas cup 328

2+2+2

Reported

فون: 0992-811240

قائم شدہ 1998

خدمت کے 12 سال

جرمنی اور فرانس کی ادویات دستیاب ہیں

ڈاکخانہ روڈ
حویلیاں

البدیر ہومیو کلینک اینڈ سٹور

ہمارے ہاں پتھری، بواسیر، موٹاپا، چھوٹا قدر، شوگر، السر، زنانہ و مردانہ پوشیدہ امراض کا شافی علاج کیا جاتا ہے۔

Amex-B

ہومیو پاتی ڈاکٹر مسز ہمایوں

D.H.M.S, R.H.M.P
F.M.T

ماہر امراض زنانہ و بچگانہ

اوقات: صبح 10 تا 12 بجے دن

CLINICAL NOTES

B.P _____

Temp _____

Pulse _____

Weight _____

Clo _____

پرہیز علاج سے بہتر ہے

☆ اچار چٹنی، پکوڑے، سو سے

سرکہ، لیموں تمام تیز مرچ والی

اور کھٹی اشیاء سے پرہیز کریں

☆ شوگر کے مریض ہر قسم کی

ٹینٹھی اشیاء سے پرہیز کریں

☆ معدہ کے مریض تیز مرچ

کھٹی اور بادی اشیاء سے

پرہیز کریں

دوران علاج

☆ دو باقاعدگی سے لیں

☆ مکمل کورس تک دو ترک نہ کریں

☆ نماز پنجگانہ کا اہتمام کریں

☆ پانی زیادہ نہیں تاہم کھانا کھانے

کے بعد نصف گھنٹہ تک پانی نہ پیئیں

ہومیو پاتی ڈاکٹر محمد ہمایوں یعقوب (گولڈ میڈلسٹ)

ڈسٹرکٹ ہومیو پاتی، ڈی۔ ایچ۔ کیو۔ ہاسپتال ایبٹ آباد

☆ کالم نگار روزنامہ آج ایبٹ آباد، نامہ نگار ماہنامہ خواتین میگزین ہفت روزہ ایشیا لاہور

☆ مرکزی سیکرٹری اطلاعات اسلامک ہومیو پاتی میڈیکل ایسوسی ایشن پاکستان

☆ Ex- ایگزیکٹو جوبیلیاں ہومیو پاتی میڈیکل کالج

موبائل: 0334-8981851

فون رہائش: 0992-810055

اوقات ہاسپتال صبح 8 تا 1 بجے دن

نوٹ: دور کے حضرات فون پر سیل وقت لیں

☆ کلینک: ظہر تا مغرب

Name _____ Age _____ Sex _____ Date _____

نام دوا

طریقہ استعمال

Dr. Pan Dey

Cap flus

10 Dm

Pan for study

تأم شدہ 1998ء خدمت کے 11 سال

البدر ہومیو پاتی کلینک اینڈ سٹور ڈاکٹر محمد ہمایوں یعقوب فون: 0992-811240 جرنی اور فرانس کی ادویات دستیاب ہیں

ہمارے ہاں پتھری، بواہیر، موٹاپا، چھوٹا قد، شوگر، السر، زنانہ و مردانہ پوشیدہ امراض کا شافی علاج کیا جاتا ہے۔

AYUB TEACHING HOSPITAL

Annex-B

LABORATORY



Dr. Jan Muhammad
Pathologist

Ph: 0992-381907-14 Ext: 3162

Incharge Pathology Department

Name
PARVEEN AKHTAR

First name

HAEMATOLOGY ANALYZER TEST

Woman

Sample ID AUTOSID874	Analysis Date 15/08/2011 08:02:43	Operator labtech
Department	Physician	

Analyser Alarms		Analysis Alarms		L1, XB		
WBC	6.0	10 ³ /mm ³	4.0	10.0		<p>WBC</p>
LYM%	45.8	%	25.0	50.0		
MON%	6.5	%	2.0	10.0		
GRA%	47.7	L %	50.0	87.0		
LYM#	2.70	10 ³ /mm ³	1.00	5.00		
MON#	0.30	10 ³ /mm ³	0.20	1.50		
GRA#	3.00	10 ³ /mm ³	2.00	9.00		
RBC	4.71	10 ⁶ /mm ³	3.80	5.80		<p>RBC</p>
HGB	12.3	g/dL	11.5	16.0		
HCT	37.7	%	37.0	47.0		
MCV	80	μm ³	80	100		
MCH	26.1	L pg	27.0	32.0		
MCHC	32.7	g/dL	32.0	36.0		
RDW	13.2	%	11.0	16.0		
PLT	212	10 ³ /mm ³	150	500		<p>PLT</p>
MPV	8.6	μm ³	6.0	11.0		
PCT	0.181	%	0.150	0.500		
PDW	12.3	%	11.0	18.0		

Amex-B

239

AYUB TEACHING HOSPITAL, LABORATORIES ABBOTTABAD
CHEMICAL PATHOLOGY

Name of Patient: Parveen Akhter Age: _____ Sex: _____

Ward / OPD: 17 Lab No. _____ Date: 18/7

TEST	RESULT	REF VALUES	TEST	RESULT	REF VALUES
Glucose (F)	mmol/l	4.02-6.0	Protein	g/l	66-87
Glucose (R)	<u>4.9</u> mmol/l	up to 10.0	Albumin	g/l	38-50
Urea	mmol/l	1.7-8.3	Globulin	g/l	
Creatinine	umol/l	M 53-97 F 44-90	T. Bilirubin	umol/l	Upto 17
Uric acid	umol/l	M 202-416 F 140-340	Bilirubin (direct)	umol/l	Upto 4.5
Calcium	mmol/l	2.12-2.75	Bilirubin (Indirect)	umol/l	
Phosphorous	mmol/l	0.87-1.45	ALK Phosphates	U/L	53-279
Sodium	mmol/l	135-145	ALT/GPT	U/L	M upto 40 F upto 31
Potassium	mmol/l	3.5-5.5	GOT	U/L	M upto 37 F upto 31
Cholesterol	mmol/l	2.5-6.4	LDH	U/L	150-450
Triglyceride	mmol/l	0.4-2.0	CPK	U/L	M 24-195 F 24-170
HDL Chol	mmol/l	0.83-2.5	Amylase	U/L	Upto 90
LDL Chol	mmol/l	up to 4.0	Acid Phos	U/L	
Urine Volume			/24 hour		
Urine Protein			/24 hour		
Cret Clearance			ml/min		

Reporting Pathologist

Annex B



AYUB TEACHING HOSPITAL, ABBOTTABAD

Filter Out Patient Department

Book No. 2159439312

S. No. 061
parveen akhter

Patient ID: 60 Y

Patient Name: Female

Patient Age: 23/11/2010 11:54:00AM

Patient Sex: Morning OPD

Patient Date & Time: Orthopaedic

Patient Mode: Abbottabad

OPD:

Address: 5 Rupees

IDP Status:

Amount:

[Handwritten signature]

Tub. Osmes (3)

Doz. D.E. (20)

Agil 2

[Handwritten scribbles]

Tub. BONZIM

Co. w. D

MOBICOR

Sy. Plazyme
[Handwritten notes]

Cap. Lactazole 30-5
[Handwritten notes]

AMER-B



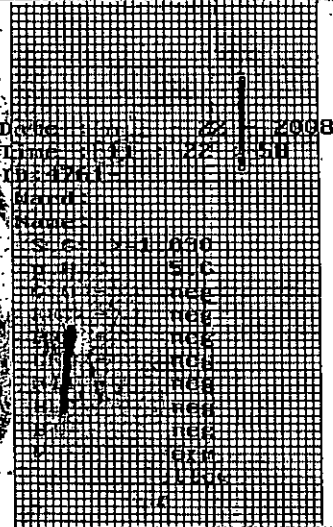
ACCURATE LABORATORY

Orush General Hospital, Mansehra Road Abbottabad
Phone: (0992) 380959, 385101

Date: 22-08-2008 12:16 PM Reception ID: 02709-08-2008
 Patient: PARVEEN BIBI Patient ID: 2352
 Age/ Gen: Years / Female Ref Doctor: Dr. Habib A. Jadoon

URINALYSIS/Combi Screen10/SL/Combiscan

GLUCOSE	Negative	
PROTEIN	Negative	
Ph	5.0	
LEUKOCYTES	Negative	/ul
Nitrite	Negative	
ERYTHROCYTES	Negative	/ul
Bilirubin	Negative	
Ketones	Negative	



Urine analysis done by automated analysers Combiscreen 10 and Combiscan

Note: Electronically verified report, signature not required

Reception ID	02709-08-2008	Patient	PARVEEN BIBI
Test Fee	30	Adjustment	Paid 30

Annex-B

ACCURATE LABORATORY



Orush General Hospital, Mansehra Road Abbottabad
Phone: (0992) 380959, 385101

Date /Time:	22-AUG-08 12:16 PM	Reception ID:	02708-08-2008
Patient:	PARVEEN BIBI	Patient ID:	2352
Age/ Gen:	Years / Female	Ref Doctor:	Dr. Habib A. Jadoon

Test	Result	Reference Ranges
ALT	20	Male = 7-41 U/L, Female = 7-31 U/L

Tests performed on Microlab 200 and 300

Note: Electronically verified report, signature not required

Reception ID	<input type="text" value="02708-08-2008"/>	Patient	<input type="text" value="PARVEEN BIBI"/>
Test Fee	<input type="text" value="100"/>	Adjustment	<input type="text"/>
		Paid	<input type="text" value="100"/>

Annex-B

ACCURATE LABORATORY

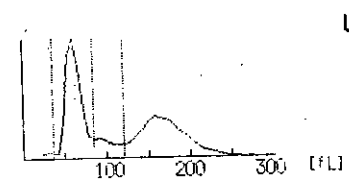


Orush General Hospital, Mansehra Road Abbottabad
Phone: (0992) 380959, 385101

Date /Time: 22-08-2008 12:16 PM Reception ID: 02707-08-2008
 Patient: **PARVEEN BIBI** Patient ID: 2352
 Age/ Gen: Years / Female Ref Doctor: **Dr. Habib A. Jadoon**

Parameter	Result	Range for Females	Range for Males
Hb		12.0-14.0	14.0-17.4
Hct			36.0-52.0
MCV			76-96
MCH			27.0-32.0
MCHC			30.0-35.0
RBC		4.0-4.75	4.00-5.50
RDW-CV			
RDW-SD			10.8-14.9
WBC			4.0-10.00
Lym%			25.0-40.0
Mxd%			3.0-7.0
Neut%			50.0-75.0
Lym#			1.30-4.00
Mxd#			0.15-0.70
Neut#			2.50-7.50
Plt(Platelets)			150-400
PDW			9.8-18.0
MPV			8.0-12.5
P-LCR			10.7-45.0

MCH 28.0pg
 MCHC 30.9g/dL
 PLT 249x10⁹/μL



LUM% + 44.4%
 MXD% + 9.8%
 NEUT% - 45.8%
 LYM# 3.2x10⁹/μL
 MXD# 0.7x10⁹/μL

This report has been generated on fully automated haematology Analyzer SYSMEX KX-21/Japan

Note: Electronically verified report, signature not required

Reception ID	02707-08-2008	Patient	PARVEEN BIBI
Test Fee	120	Adjustment	
		Paid	120

Annex-B

ACCURATE LABORATORY



Orush General Hospital, Mansehra Road Abbottabad
Phone: (0992) 380959, 385101

S. No. 2352

RECEIPT

Date: 22-AUG-08

Received with thanks from PARVEEN BIBI Rs. 250 on account of Lab Test(s) the sum of Rs. Two Hundred Fifty only

S. No	Test(s)	Fee
1	ALT	100
2	CP (COMPLETE PICTURE)	120
3	URINALYSIS/Combi Screen10 SL/Combiscan	30
Total:		250
Discount:		0
Paid Amount:		250

(Accurate Laboratory)

Centre for Digestive and Liver Diseases

Amber-B

Dr. Habib Ahmed Jadoon

MBBS(Pesh), MRCP (UK)
Gold Medalist, Ever Best Graduate(AMC)

Consultant Physician, Gastroenterologist, Hepatologist
Medical Director Orush General Hospital, Abbottabad.
Formerly Consultant Physician and Associate Professor of
of Medicine, Ayub Medical College and Teaching Hospital,
Abbottabad.

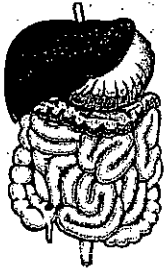
Clinic: Orush General Hospital, Mansehra Road,
Mandian, Abbottabad.
Phone: (0992) 380959

Friday, August 22, 2008
12:21:44 PM

Diagnostic and therapeutic, upper and lower GI endoscopic
services available by appointment.

Consultation by prior appointment.

PARVEEN AKHTAR



1. RIZE/ ZAUXIT/ AZENE/ DEPNIL 20 mg; 1 daily after breakfast
2. PLASIL Enzyme tab; 1+1+1 20 minutes before meals for 20 days
3. OSYD 20 mg; 1 cap 30 minutes before breakfast for 6 weeks
4. FEMIDOL tab; 1+1 after meals for 20 days

Habib Jadoon

ڈاکٹر حبیب احمد جادون

ایم بی بی ایس، ایم آر سی پی (انگلینڈ)

گولڈ میڈلسٹ، ایور بیسٹ گریجویٹ

میڈیکل سپیشلسٹ و ماہر امراض معدہ، جگر و آنت

میڈیکل ڈائریکٹر اورش جنرل ہسپتال ایبٹ آباد

سابقہ ایسوسی ایٹ پروفیسر شعبہ میڈیسن ایوب میڈیکل کالج ایبٹ آباد

کلینک: اورش جنرل ہسپتال منڈیاں ایبٹ آباد

تخصص امراض معدہ و آنت کیلئے جدید مشینری کی سہولت موجود ہے

اوقات کار: صبح 7 بجے سے رات 6 بجے تک

ٹیلی فون: (0992) 380959

موبائل: 0314-9948832

پیشہ برادری اور
سے سے پہلے نون برہم ضرور لیں

DR. HABIB AHMED JADOON
MBBS(PESH), MRCP(UK)
Gold Medalist, Ever Best Graduate(AMC)
Consultant Physician, Gastroenterologist, Hepatologist
Medical Director Orush General Hospital, Abbottabad.

Name:

محمد حسن احمد

Age:

55 سال

Address:

بیت

Pulse:

71

BP:

130 / 69

Temp:

59 kg

Neurosurgeon

Annex-B

Lt. Col

Dr. Noman Arshad

CL. Neurosurgeon
Associate Professor of
Neurosurgery.



لفطیٹ کرٹل
ڈاکٹر نومان ارشد

کلاسفائیڈ نیورو سرجن
ایسوی ایٹ پرو فیسر آف
نیورو سرجری

C.M.H. Abbottabad

سی۔ ایم۔ ایچ ایٹ آباد

Patient Name : Parveen Akhter Age : _____ Date : 4/4/11

Sciatica Lt.

MR full.

AD Lt.

Dyspepsia.

Adv.

1. MRI L.S. spine plain

2. Tab Melfax 15mg

ایسے ایسے ایسے ایسے

3. Tab Albal 500mg

ایسے ایسے ایسے

4. Tab Tramal SR 100

ایسے ایسے ایسے

5. Tab Famoprin 40mg

ایسے ایسے ایسے

x1
نہ

BEVAZEER SHAHEED TEACHING HOSPITAL, ABBOTTABAD

OUT PATIENTS DEPT

RS/5/-

Amplex-2

No

NAME

YEARLY NO

DATE

ENTR-DPO

FACE VALUE RUPEES 5

W. S. Khan

FULL

26

Case Amplicox 500mg

14.12.16

Tds paston 1g

(T.M)

K

Annex B

BENAZEER SHAHEED TEACHING HOSPITAL ABBOTTABAD

OUT PATIENTS DEPT.

No

Rs/S/-

NAME

[Handwritten signature]
20258

YEARLY NO

R/11

DATE

23/08

PAGE VALUE RUPES 3

HICCC

10707

— Tab NO ENCOVITAN

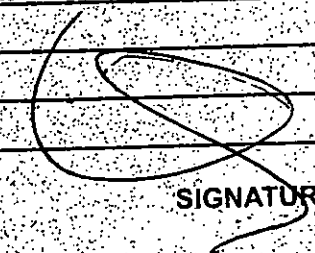
[Handwritten scribbles]

AYUB TEACHING HOSPITAL, LABORATORIES ABBOTTABAD

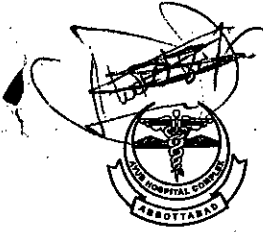
Name of Patient:	<i>Parveen Akhtar</i>	Age:	<i>11</i>	Sex:	
Ward/OPD:	Lab No.:	Date:	<i>26/12/11</i>		

URINE EXAMINATION

PHYSICO CHEMICAL ANALYSIS	
• COLOUR	<i>Yellow</i>
• TURBIDITY	
• SEDIMENT	
• pH	
• SPECIFIC GRAVITY	
• GLUCOSE	<i>Nil</i>
• ALBUMIN	<i>Trace</i>
• KETONES	
• BILIRUBIN	
• UROBILIOGEN	
• BLOOD	
• BILE SALT / PIGMENT	

MICROSCOPIC EXAMINATION	
• PUS CELLS	<i>06-08</i>
• RED BLOOD CELLS	<i>01-02</i>
• EPITHELIAL CELLS	<i>Few</i>
• BACTERIA	
• CRYATALS	
• CASTS	
• PARASITES	
	<i>Mucus (+)</i>
 SIGNATURE	

ANNEX-B



AYUB TEACHING HOSPITAL, ABBOTTABAD
Accident & Emergency Service Department

Amee B

Book No.

1004

S. No. 057

Patient ID:

34330

Patient Name:

2/1/2015

Patient Age:

Patient Sex:

Patient Date & Time:

12

Patient Mode:

OPD:

26/11

Address:

IDP Status:

Amount:

~~Refer to medical OPD.~~
Age: 60 yrs.

Pt Ab AI - LBB. 25 yrs old

Alc ~~Ammonia~~

frequency urgency - 12 yrs
Pressure Pelvic - 12 yrs

O/E

- Small cystocele
- No Rectocele

Adv = Urine
R/E

lab ciprox 300g

Shows 6-8 Pus cells

1 (Cap)

U>F - 1+1

Adv = Urine
C/S

Cram max latched

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

In the matter of
Service Appeal No.1059/2014
Nasir-Ud-Din Bangash Budget and Account Officer
Attached to Central Prison Bannu**Appellant.**

VERSUS

1. Secretary to Government of Khyber Pakhtunkhwa,
Home and T.As Department.
2. Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar.
3. Superintendent
Central Prison Haripur.
4. Majid Ghufra Budget and Account Officer
Central Prison Haripur**Respondents.**

PARAWISE REPLY ON BEHALF OF RESPONDENTS No. 1 to 3.

Preliminary Objections

- i. That the appellant has got no cause of action.
- ii. That the appeal is incompetent and is not maintainable in its present form.
- iii. That the appellant is estopped by his own conduct to bring the present appeal.
- iv. That the appellant has no locus standi.
- v. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
- vi. That the appeal is barred by law.

ON FACTS

1- In-correct, misleading. the plea of the appellant is not based on facts because in the present on going worsened scenario with special reference of the ongoing insurgency throughout the country especially in Khyber Pakhtunkhwa being its gateway and particularly the Prisons Department in the most vulnerable point from so many dimensions.

This is the reason that in the best public interest the management of the Prisons Department with the assent of controlling officers / competent authority making all out efforts to maintain the congenial atmosphere at all fronts including the internal and external Jail managements. In the process none is out

of the range because it is not usual circumstances. All Postings / transfers are being made keeping in view various aspects and its finalization is being made in the best public interest. In the adaptation of such mechanism so many reports / information are considered by the competent authority which either directly or indirectly having its affect with the Jail management maintenance of routine business.

Though outwardly nothing is there against the appellant but it is the domain of competent authority to address and redress the apprehensions and make necessary decisions with regard to making certain changes within the Jail management irrespective of the facts as to whether the transferee having any direct or indirect positive or negative touch, hence the plea of the appellant with regard to Pre-mature transfer is beyond any logic at this very crucial stage.

- 2- Pertains to record, however it is to clarify here that in the present day circumstances the plea of the appellant that he is an efficient and trustworthy officer is contrary to the fact that efficiency of all Government Servants can only be judged though the annual performance report by the authorized officer known as ACRs and it is on record that the appellant has no clear past track record as evident from the enclosed copy of secret ACR report awarded to the appellant by both the reporting officers and countersigning officer and their viewpoints already been held by the appellate authority i.e. Home Secretary. Though the appellant on that very stage also tried to get relief from the Court with regard to expunge the adverse entry but due to soundless and baseless grounds he failed to get any sort of relief in this regard.

- 3- In-correct, misleading as elaborated in Para-1&2 above.
- 4- As elaborated in Para-1. However, transfer of the Prisons Management having certain off the record and deniable facts that contrary to the norms of the security to be shared at any forum but the competent authority goes to the maximum possible extent to make necessary change at any stage just to thwart the apprehension being shared with them or brought to their notices. Though outwardly such changes might cause certain level of irritation for the affectee yet that are need of the day and cannot be avoided under the circumstances.
- 5- In-correct and just blaming the other party having no sound footing. The said respondent can bitterly explain to deny the charges leveled against him.
- 6- Correct to the extent that being service matter the appellant showing his extra ordinary cunningness and intentionally ignoring the right forum to approach for redressal of his grievances i.e. Khyber Pakhtunkhwa Service Tribunal instead he preferred his appeal to the Civil Court but the instant matter does not fall within the domain of Civil / Lower Courts because it is a known fact that the Provincial Khyber Pakhtunkhwa Service Tribunal having a legal status equivalent to that of Peshawar High Court Peshawar but the appellant making a short cut in order to pressurize the Department has preferred his appeal to the Civil Court which clearly convey his low mentality because he even does not fulfill the legal mechanism under the law / service rules of preferring departmental appeal / presentation, thus the appellant intentionally violated the set procedure and committed a gross misconduct on his part being a responsible Government Officer which is never ever been expected from his prestigious status of Government Officer. Thus the

appellant has approached to the wrong forum and said has denied any sorts of relief.

- 7- Pertains to record, yet it is to confirm that having no sound footing the departmental re-presentation made by the appellant has been processed by cannot be acceded to.
- 8- No comments.

GROUND: -

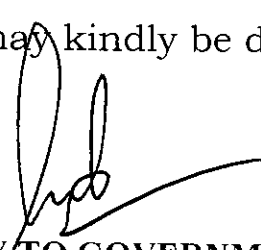
- A. As elaborated in Para-1, that ample explanation and departmental view points in the instant appeal.
- B. In-correct misleading. The appellant has attempted to mislead the learned Court / Tribunal by making allegations which having no sound footing because posting transfer is the sole domain of the competent authority and in the best public interest. Furthermore, the authority exercises its powers in accordance to the laid down parameters. There is no bar especially after the 18th Constitutional Amendment whereby the concerned Department, Minister or Advisor may be restricted to make recommendations.
- C. In-correct misleading. The Public representative only makes recommendations in the best public interest without any vested interest and without any political motivation or Political victimization.
- D. In-correct, misleading. Any competent forum / authority can make any sorts of decision in order to ensure smooth running of all officials business at all levels hence such steps taken in the best public interest cannot be termed as Political victimization.
- E. As elaborated in Para-1 & Par-A above.
- F. As elaborated in Para-1 & Par-A above.
- G. In-correct, misleading. All Provincial Government employees are abide by the laid down policies including transfer from one

station to other and they have to manage their own responsibilities at both ends.


H. As elaborated in Para-G, non-compliance of the lawful orders of the competent authority has to be put the doer under the umbrella of misconduct and then the law / rules has to come in action.

I. No comments


It is therefore, humbly prayed that on acceptance of this reply, instant appeal may kindly be dismissed with cost throughout.


SECRETARY TO GOVERNMENT
KHYBER PAKHTUNKHWA
HOME & T.A.S DEPARTMENT PESHAWAR.
(Respondent No.1)

Home Secretary
Khyber Pakhtunkhwa


INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
(Respondent No.2)

26/3/15


SUPERINTENDENT
CENTRAL PRISON HARIPUR
(Respondent No.3)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

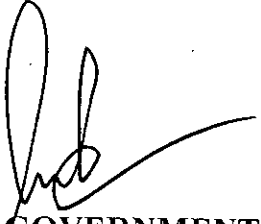
In the matter of
Service Appeal No.1059/2014
Nasir-Ud-Din Bangash Budget and Account Officer
Attached to Central Prison Bannu**Appellant.**

VERSUS


1. Secretary to Government of Khyber Pakhtunkhwa,
Home and T.As Department.
2. Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar.
3. Superintendent
Central Prison Haripur.
4. Majid Ghufran Budget and Account Officer
Central Prison Haripur**Respondents.**


PARAWISE REPLY ON BEHALF OF RESPONDENTS No. 1 to 3.


We the undersigned respondents do hereby solemnly affirm and declare that the contents of the Para-wise comments on the above cited appeal are true and correct to the best of our knowledge and belief and that no material facts have been kept secret from this Honorable Tribunal.


SECRETARY TO GOVERNMENT
KHYBER PAKHTUNKHWA
HOME & T.AS DEPARTMENT PESHAWAR.
(Respondent No.1)

Home Secretary
Khyber Pakhtunkhwa


INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
(Respondent No.2)


26/3/15


SUPERINTENDENT
CENTRAL PRISON HARIPUR
(Respondent No.3)

From: The District Police Officer,
Haripur

To: The Superintendent,
(Central Prisons) Haripur

No: *1008* /dated Haripur the *24/04* 2014.

Subject: **HOLDING OF TWO ID CARDS BY ACCOUNTANT CENTRAL PRISONS HARIPUR**

Memo:

With reference to the subject cited above.

It has come to the notice of the undersigned that Nasir ud Din Bangish s/o Alaud Din Bangish, serving under your command as Accountant have two NADRA ID Cards which is a serious violation of NADRA rules/laws.

It is brought into your notice that being a member of a sensitive establishment, an official shall refrain from indulging in any unlawful act. You are therefore, requested to keep a vigil in this regard.

District Police Officer,
Haripur

pk
24/4
one card from a
then put up to
one
28/4/14

[Signature]
Superintendent
Central Prison
Haripur

place in file.
[Signature]
29/6



OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

No. 3/89-J-2014-7735/WE

Dated 01-04-2015

To,

The Superintendent,
Central Prison Bannu.

Subject:- **PROVISION OF INFORMATION.**

Memo;

I am directed to refer to your letter No. 885/WE dated 27/02/2015, this department is vigorously pursuing the case to safe-guard government-interest. Therefore, it is stated the Mr. Nasir-ud-Din Bangash Budget and Account Officer attached to your jail was transferred and posted to Central Prison Bannu against vacant post, on his own request vide this office Order No.27/2-J-2004/20070 dated 29-11-2006 (copy enclosed). However, now the requisite information requested by the above named official vide your office memo No. 648-WE dated 10-02-2015 is given below:-

S. #	Name of Officer	Designation	Domicile District	BPS	Sanctioned strength of posts in BPS-16 & BPS-17 in Prisons Inspectorate.	Date of posting in present grade at Prisons Inspectorate.	Date of posting at Prisons Inspectorate.	Period of stay at present station.		
								Y	M	D
1.	Mr. Rizwanullah	Assistant Director(Admn)	Mardan	17	01	03-10-2013	1982	32	-	-
2.	Mr. Sakhawat Shah.	Office Superintendent.	Charsadda	17	07	24-6-2011	12-8-1982	32	06	16
3.	Mr. Samiullah Khan.	Office Superintendent	Swat.	17	-do-	22-5-2013	28-6-2008	06	08	-
4.	Mr. Farman Ali	Office Superintendent	Mardan.	17	-do-	08-1-2014	04-2-2002	13	-	24
5.	Mr. Mohtarim Shah.	Budget & Accounts Officer.	Peshawar	16	01	01-12-2010	14-3-2009	05	11	12
6.	Mr. Zahid Awaz.	Assistant.	Swabi.	16	09	31-5-2014	22-10-2005	09	04	06
7.	Mr. Jehan Zeb.	Assistant.	Swabi.	16	-do-	31-5-2014	01-7-2009	05	07	27
8.	Mr. Mass Khan.	Assistant.	Peshawar	16	-do-	31-5-2014	01-8-2011	03	06	27
9.	Mr. Nasir-ud-Din.	Assistant.	Peshawar	16	-do-	31-5-2014	02-8-2013	01	06	26
10	Mr. Fazal Ala.	Assistant.	Charsadda	16	-do-	31-5-2014	24-3-2014	-	11	04

No 871
7/4/15

Handwritten signatures and notes, including "OT 01-15" and "9-B File".

ASSISTANT DIRECTOR (ADMN)
FOR INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

Handwritten signature and initials.

0322-9054875
CCTV
//

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No.1059/2014

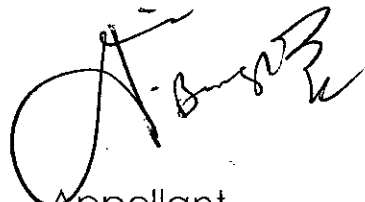
Nasir ud Din Bangash.Appellant

Versus

The Secretary to Govt. of KPK & others.Respondents

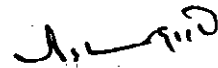
I N D E X

S.No	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Rejoinder with Affidavit		1-6
2.	Copy of provision of information of employee, who has been posted at Headquarter for the last 30 years	"RJ/I"	7
3.	Copies of transfer order	"RJ/II"	8- 10
4.	Copies of transfer order	"RJ/III"	12-15



Appellant

Through



Ashraf Ali Khattak
Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Service Appeal No.1059/2014

Nasir Ud Din Bangash Budge^t and Account Officer
.....Appellant.

Versus

The Secretary to Govt: of Khyber Pakhtunkhwa Home
and T. As Department and others..... Respondents.

**REJOINDER ON BEHALF OF APPELLANT IN
RESPONSE TO REPLY FILED BY
RESPONDENTS.**

Respectfully Sheweth,

Preliminary Objections:

Preliminary objections raised by answering respondents are erroneous and frivolous as having no factual and legal backing. The answering respondents have failed to explain as why appellant has got no cause of action and locus standi; how the appeal suffers from limitation and laches; how appellant is estopped by his conduct, how the appellant is not an aggrieved person within the meaning of section 4 of the Service Tribunal Act, 1974 and how the appeal is not maintainable; what material facts have been concealed by the appellant and why the appeal is not maintainable; why the appeal is liable to be dismissed in limini. No plausible explanation have been provided/submitted by the answering respondents? No specific and due objection regarding the controversial question of fact involved in the instant service appeal has

been raised therefore, appellant is unable to submit proper rejoinder to the preliminary objection raised by the answering respondents.

Facts:

1. That Reply to Para No.1 of the appeal by the answering respondents is incorrect, hence denied. It is correct to the extent of insurgency prevailing in the country and Jails are particular targets of miscreants, but who could it be attached with posting/transfer of the appellant. Para No.XIII of the Posting/Transfer policy provides as to follow:-

XIII. While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:-

a) To ensure the posting of proper persons on proper posts, the performance evaluation report/ACRs, past and present record of service, performance of post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.

b) Tenure on present posts shall also be taken into consideration and the posting/transfers shall be in the public interest.

Now the question is whether the spirit of the provision of law cited *ibid* have been complied with by the respondents while issuing the impugned order or whether the respondent have issued the impugned order on consideration other than merits.

The impugned order has been passed with bad faith, malafide, extraneous consideration and political basis. Respondent No.4 who has been transferred from Haripur Jail to Central Prison Bannu after 09 year has been re-adjusted on his choice posting just after 09 months.

What was the logic behind this immediate re-adjustment?

And

Why appellant has been subjected to immediate re-transfer to Central Prison Bannu?

The respondents instead of submitting proper answer to the averment made in Para No.1 of the appeal have in order to mislead the Honourable Tribunal indulges in extraneous stories, which has no link with controversial question involved in the present appeal.

Respondents have always kept unilateral policy. There are numerous employee of the respondents department, who have been enjoying their service at Head Quarter for the last about 30 years without being transferred (Annexure-RJ/I). There are other employees of the appellant rank, who are enjoying their service at Peshawar even on detailment basis (Annexure-RJ/II). There are employees who are on the strength of other Jail, and are even receiving their salaries from the centre, where they have been posted but have been kept at Headquarter on extraneous means (Annexure-RJ/III).

2. That reply to Para No.2 of the appeal by the answering respondents is incorrect, hence denied. Appellant has clean sheeted conduct record. The

ACR attached with memo of reply relate to 2005. It is settle law, the adverse entry in ACR loses their value/status after two years, if an employee acquire good ACRs subsequently. Appellant has acquired A and A++ evaluation reports/ACRs since 2006 till the date. There is no adverse entry against him nor any sort of complaint. The performance of the appellant is spotless. He is budget and account officer and deal with billion of budget every year, but no one could even blame him for a single penny embezzlement/corruption etc. All the superior officers have always appreciated the high skill and work of the appellant.

3. That no proper reply has been submitted by the answering respondents in response to Para No.3 of the appeal, hence admitted.
4. That reply to Para No.4 of the appeal by the answering respondents is incorrect, hence denied. Respondents willfully try to misled this Honourable Tribunal. The view points of the respondents are general in nature and have no nexus with instant grievances of the appellant nor does it have any sort of support of facts and evidence. The impugned transfer order is based on malafide and has been issued on political and extraneous considerations and the same are evident from the case file.
5. That reply to Para No.5 of the appeal is incorrect, hence denied.

6. That reply to Para No.6 of the appeal is incorrect, hence denied. Respondents have used abusive language against appellant, which is against the norms of fair play and amount to contempt. To approach wrong forum of law is illegality but not sin or misconduct.
7. That reply to Para No.7 of the appeal is incorrect, hence denied. The mandatory provisions of Rule-5 of the appeal Rules, 1986 has been violated.
8. Para No.8 of the appeal has been admitted.

Grounds:

A-G: The replies to grounds A-G of the appeal are mere repetition of the facts, hence no need of further elucidation. Appellant rely on his grounds already submitted in his memo of appeal. However it is pertinent to explain that appellant has been victimized through the impugned order. Almost all the provisions of Posting/Transfer Policy of the Provincial Govt have been violated. Respondent No.4 being blue eyed chap of the respondent have been accommodated at his choice posting.

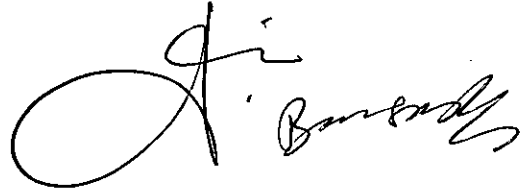
It is also pertinent to explain and bring into the active knowledge of this Honourable Tribunal as to whether the respondent have answered any query asked in the memo of appeal.

Whether the respondents have explained as to why the tenure policy was ignored? How the appellant is not victimized? How the impugned order is not politically motivated and has not been passed on extraneous considerations?. Why merit policy has been ignored?. Why respondent No.4 has been re-

transferred and adjusted at his choice posting?
What was the cause of re-adjustment of respondent
No.4 within the period of 09 months at his choice
station?

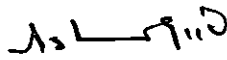
The respondents have also failed to quote any law
permitting a political figure to indulge in posting
transfer of employees of an organization.

It is, therefore, humbly prayed that the reply of
answering Respondents may graciously be rejected and
the appeal as prayed for may graciously be accepted with
costs.



Appellant

Through



Ashraf Ali Khattak
Advocate, Peshawar.

Dated: _____ / 06/ 2015

Affidavit

I, Nasir Ud Din Bangash Budge^t and Account
Officer, do hereby affirm and declare on oath that the
contents of this rejoinder are true and correct to the best
of my knowledge and belief and nothing has been
concealed from this Hon'ble Tribunal.




Deponent



Anx: RJ/I

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

No. 3/89-J-2014-7735/WE

Dated 01-04-2015

To,

The Superintendent,
Central Prison Bannu.

Subject:- **PROVISION OF INFORMATION.**

Memo;

I am directed to refer to your letter No. 885/WE dated 27/02/2015, this department is vigorously pursuing the case to safe-guard government interest. Therefore, it is stated the Mr. Nasir-ud-Din Bangash Budget and Account Officer attached to your jail was transferred and posted to Central Prison Bannu against vacant post, on his own request vide this office Order No.27/2-J-2004/20070 dated 29-11-2006 (copy enclosed). However, now the requisite information requested by the above named official vide your office memo No. 648-WE dated 10-02-2015 is given below:-

S. #	Name of Officer	Designation	Domicile District	BPS	Sanctioned strength of posts in BPS-16 & BPS-17 in Prisons Inspectorate.	Date of posting in present grade at Prisons Inspectorate.	Date of posting at Prisons Inspectorate.	Period of stay at present station.		
								Y	M	D
1.	Mr. Rizwanullah	Assistant Director(Admn)	Mardan	17	01	03-10-2013	1982	32	-	-
2.	Mr. Sakhawat Shah.	Office Superintendent.	Charsadda	17	07	24-6-2011	12-8-1982	32	06	16
3.	Mr. Samiullah Khan.	Office Superintendent	Swat.	17	-do-	22-5-2013	28-6-2008	06	08	-
4.	Mr. Farman Ali	Office Superintendent	Mardan.	17	-do-	08-1-2014	04-2-2002	13	-	24
5.	Mr. Mohtarim Shah.	Budget & Accounts Officer.	Peshawar	16	01	01-12-2010	14-3-2009	05	11	12
6.	Mr. Zahid Awaz.	Assistant.	Swabi.	16	09	31-5-2014	22-10-2005	09	04	06
7.	Mr. Jehan Zeb.	Assistant.	Swabi.	16	-do-	31-5-2014	01-7-2009	05	07	27
8.	Mr. Mass Khan.	Assistant.	Peshawar	16	-do-	31-5-2014	01-8-2011	03	06	27
9.	Mr. Nasir-ud-Din.	Assistant.	Peshawar	16	-do-	31-5-2014	02-8-2013	01	06	26
10	Mr. Fazal Ala.	Assistant.	Charsadda	16	-do-	31-5-2014	24-3-2014	-	11	04

No 871
7/4/15

Handwritten signatures and notes, including "07-04-15" and "File".

ASSISTANT DIRECTOR (ADMN)
FOR INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

Handwritten signature "Aisha" and initials "MWO".



Anx: RJ/II OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No.Estb/TPO-Ex-Staff/4/15-T-2009/28110 1-

Dated 19-11-2014 1-

ORDER

Upon completion of Six (06) months Job Training by newly recruited Assistant Superintendent Jails (BPS-14), following postings / transfers are hereby ordered in the public interest: -

S#	Name and Designation	From	To
1-	Mr. Kashif, Assistant Superintendent Jail (BPS-14)	CP Peshawar	CP D.I.Khan against vacant post.
2-	Mr. Najam Hussain Abbasi, Assistant Superintendent Jail (BPS-14)	CP Peshawar	CP Bannu Vice #3
3-	Mr. Rifaqat Zahoor, Assistant Superintendent Jail (BPS-14)	CP Bannu	CP Peshawar Vice #2
4-	Mr. Ibrar Ahmad Wazir, Assistant Superintendent Jail (BPS-14)	CP Bannu	CP Peshawar Vice #1 above.
5-	Mr. Muhammad Faizan Zaib, Assistant Superintendent Jail (BPS-14)	DJ Mansehra	CP Haripur Vice #6
6-	Mr. Shehryar Khan, Assistant Superintendent Jail (BPS-14)	CP Haripur	SJ Battagram against vacant post

NOTE

- (i) All should be relieved of their duties immediately by making local arrangements.
- (ii) Arrival / departure report should be sent to all concerned.
- (iii) Minimum days joining time may be allowed.
- (iv) No T.A / D.A are allowed to official at S.No.3,4 & 6 above on this account.

INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

Endst; No. 28111-23 /-

Copy of the above is forwarded to the: -

- 1) Accountant General Khyber Pakhtunkhwa Peshawar for information.
- 2) Superintendent Central Prison Peshawar, Haripur, Bannu & D.I.Khan.
- 3) Superintendent District Jail Mansehra.
- 4) Superintendent Sub Jail Battagram.

For information and necessary action

- 5) District Accounts Officers, Haripur, Bannu, D.I.Khan, Mansehra and Battagram for information.
- 6) PS to Advisor to Chief Minister (for Prisons) Khyber Pakhtunkhwa Peshawar for information.

INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No.Estb/TPO-Ex-Staff/ 3678 /-

Dated 13-02-2015 /-

ORDER

Mr. Najam Hussain Abbasi, Assistant Superintendent Jail (BPS-14) attached to Central Prison Bannu is hereby attached to Head Office only for the purpose of duty, however, for the purpose of pay he is attached with Judicial Lockup Nowshera against the vacant post till further orders.

Note: -

- (i) He should be relieved immediately by making local arrangements.
- (ii) Arrival and departure report should be sent to all concerned.
- (iii) Minimum joining time should be allowed.
- (iv) No TA / DA are allowed to him on this account of his temporary attachment basis.


INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Endst; No. 3679-85 /-

Copy of the above is forwarded the:-

- (1) Superintendent Central Prison Bannu.
- (2) Superintendent Judicial Lockup Nowshera

For information and necessary action.

- (3) District Accounts Officer Nowshera and Bannu.
- (4) Office Accountant, Office of Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.

For information.

- (5) Mr. Najam Hussain Abbasi, Assistant Superintendent Jail for information with the direction to look after the Legal affairs / Court / Tribunal Cases etc; of the Khyber Pakhtunkhwa Prisons Department.


INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

AS/HC
via
18-02-15

PC 9B

n/o 460
17-2-15



OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

NO. 1041

DATED 13-01-2015

ORDER

Female Head warder(BPS-7) Tauheed Begum attached to Central Prison Bannu hereby transferred and posted in the same capacity to High Security Prison/District Jail Mardan against the vacant post. She should be relieved immediately by making local arrangement.

NOTE

- i. Arrival and departure reports should be sent to all concerned.
- ii. Minimum joining time may be allowed.

ENDST;NO. 1042-47

INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Copy of the above is forwarded to :-

1. The Superintendents Headquarters Prison Peshawar & D.I.Khan for information.
2. The Superintendent, Central Prison Bannu.
3. The Superintendent H.S.P/District Jail Mardan.

For information and necessary action.

4. The District Accounts Officers Bannu & Mardan for information.

INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

Relieved on 29/1/15
vide No. 455-59
dtd: 29-01-2015

No 150
15/1/15

**ORDER**

**OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

☎ 091-9210334, 9210406 📠 091-9213445

No. Estb/Ward-/Orders/ 2452 /-

Dated 30/01/2015 /-

In partial modification of this office order No.458 dated 06-01-2015, the following postings / transfers orders are hereby ordered in the Public Interest: -

- (1) Transfer order in respect of Warder (BPS-05) Afsar Khan s/ Atlas Khan from Judicial Lockup Malakand to High Security Prison Mardan issued vide this office order referred to above is cancelled.
- (2) Warder (BPS-05) Naveedullah s/o Nawab Khan attached to Central Prison Peshawar is hereby transferred and posted in the same capacity to Internment Center Lakki Marwat against the newly created post.
- (3) Warder (BPS-05) Samid Khan who is performing temporary duties at Central Prison Haripur and for the purpose of pay attached to District Jail Swat is hereby transferred and posted for all purposes to High Security Mardan against the newly created post.
- (4) Warder (BPS-05) Abid Khan s/o Shamshad Khan attached to Central Prison Haripur is hereby transferred and posted in the same to capacity High Security Mardan against the newly created post.
- ✓ (5) Transfer order in respect of Female Head Warder (BPS-07) Tauheed Begum from Central Prison Bannu to High Security Prison Mardan issued vide this office order No.1041 dated 13-01-2015 is hereby cancelled.

NOTE

- (a) Arrival and departure reports should be sent to all concerned.
- (b) Minimum joining time should be allowed.
- (c) All should be relieved immediately by making local arrangement.
- (d) No TA /DA is allowed to official at S.No.2,3,&4 above on this account.

Endst; No. 2453-68 /,

Copy of the above is forwarded the:-

- (1) Superintendent Circle Headquarters Prisons Peshawar, Haripur, D.I.Khan and Mardan.
- (2) Superintendent Central Prison Haripur & Bannu
- (3) District Jail / High Security Prison Mardan.
- (4) Superintendent District Jail Swat.
- (5) Superintendent Judicial Lockup Malakand.
- (6) Incharge Internment Center Lakki Marwat.

For information and necessary action.

- (7) Superintendents Districts Accounts Officers Haripur, Bannu, Mardan, Swat, Lakki Marwat, Malakand.

INSPECTOR GENERAL OF PRISON

*NU-267
30/1-1-2015*



Anx: RJ/II

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406

091-9213445

No.Estb/OST/Orders/ 48 /-

Dated 01-01-2015 /-

ORDER

In pursuance to the Government of Khyber Pakhtunkhwa Home and Tribal Affairs Department Notification No.SO(Prisons)HD/4-22-C/2013/Vol-III/BC-113947 dated 26-11-2014, the following postings / transfers are hereby ordered in the public interest:-

S#	Name	Designation	Up-graded Designation	From	To
1-	Mr. Sajjad Hussain,	Junior Technician Pharmacy (BPS-09)	Chief Tech (B-16)	CP D.I.Khan	CP Peshawar
2-	Mr. Suleman Khan,	Junior Technician Pharmacy (BPS-09)	Chief Tech (B-16)	CP Peshawar	CP Haripur
3-	Mr. Javed Khan,	Junior Technician Pharmacy (BPS-09)	Senior Tech (B-14)	DJ Kohat	CP Peshawar
4-	Mr. Mizajullah,	Junior Technician Pharmacy (BPS-09)	Senior Tech (B-14)	J/L Malakand	CP Haripur
5-	Mr. Gul Fam Khan,	Junior Technician Pharmacy (BPS-09)	Senior Tech (B-14)	CP Haripur	CP D.I.Khan
6-	Mr. Javed Iqbal,	Junior Technician Pharmacy (BPS-09)	Senior Tech (B-14)	CP Peshawar	CP Bannu
7-	Mr. Sher Zada,	Junior Technician Pharmacy (BPS-09)	Technician (B-12)	CP Peshawar	CP Haripur
8-	Mr. Mehmood Ali,	Junior Technician Pharmacy (BPS-09)	Technician (B-12)	CP D.I.Khan	CP Bannu
9-	Mr. Khairullah,	Junior Technician Pharmacy (BPS-09)	Technician (B-12)	DJ Mardan	DJ Abbottabad and for duty purpose with CP Haripur
10-	Mr. Akram Khan,	Junior Technician Pharmacy (BPS-09)	Technician (B-12)	DJ Mardan	DJ Mardan
11-	Mr. Mohammad Ashraf,	Junior Technician Pharmacy (BPS-09)	Technician (B-12)	CP Peshawar	CP Peshawar
12-	Mr. Wajahatullah,	Junior Technician Pharmacy (BPS-09)	Technician (B-12)	CP Peshawar	DJ Swat
13-	Mr. Amir Abdullah,	Junior Technician Pharmacy (BPS-09)	Technician (B-12)	J/L Tank	CP D.I.Khan
14-	Mr. Abdul Tawab,	Junior Technician Pharmacy (BPS-09)	Technician (B-12)	S/J Charsadda	DJ Timergara
15-	Mr. Imran Ahmad,	Junior Technician Pharmacy (BPS-09)	-	CP Haripur	DJ Mardan Vice No.09 above.
16-	Mr. Samiullah,	Junior Technician Pharmacy (BPS-09)	-	CP Haripur	BI Bannu for pay and for duty at IC Larki Vice No.17 below.
17-	Mr. Hameedullah,	Junior Technician Pharmacy (BPS-09)	-	BI Bannu, IC Larki	CP D.I.Khan vice No.17 below.
18-	Mr. Muhammad Imran	Junior Technician Pharmacy (BPS-09)	-	CP D.I.Khan	J/L Tank vice No.13 above.
19-	Mr. Niaz Ali,	Junior Technician Pharmacy (BPS-09)	-	CP Bannu	Sub Jail Dassu Vice No.20 below.
20-	Mr. Muhammad Jan,	Junior Technician Pharmacy (BPS-09)	-	SJ Dassu	CP Peshawar Vice No.12 above.
21-	Mr. Muhammad Iqbal,	Junior Technician Pharmacy (BPS-09)	-	CP Bannu	DJ Kohat vice No.03 above.
22-	Mr. Rehmat Zada	Junior Technician Pharmacy (BPS-09)	-	DJ Swat	J/L Malakand Vice No.04 above.
23-	Mr. Irfan Ali.	Junior Technician Pharmacy (BPS-09)	-	J/L Swabi.	Sub Jail Charsadda vice No.14 above.



OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No.Esth/OST/Orders/ 48 / 1-

Dated 01-01-2015 / 1-

Page-2

NOTE

- (a) Arrival and departure reports should be sent to all concerned.
- (b) Minimum joining time should be allowed.
- (c) All should be relieved immediately by making local arrangement.

**INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR**

Endst: No. 49-80 / 1.

Copy of the above is forwarded the:-

- (1) Secretary to Government of Khyber Pakhtunkhwa, Home and Tribal Affairs Department Peshawar for information with reference Home Department Notification referred to above.
- (2) Accountant General Khyber Pakhtunkhwa Peshawar for information
- (3) Superintendent Central Prison Peshawar, Haripur, D.I.Khan and Bannu.
- (4) Superintendent District Jail Mardan, Swat, Timergara, Kohat, Abbottabad,
- (5) Superintendent Sub Jail Charsadda, Dassu Kohistan,
- (6) Superintendent Judicial Lockup Tank, Malakand, Swabi
- (7) Superintendent / Principal Borstal Institution Bannu.
- (8) Incharge Internment Center Lakki Marwat.

For information and necessary action.

- (9) District Accounts Officers, Haripur, D.I.Khan and Bannu, Mardan, Swat, Timergara, Kohat, Abbottabad, Charsadda, Dassu Kohistan, Tank, Malakand, Swabi for information.

Handwritten signatures and dates:
 07/15
 07/11/2015
 B.O
 M.A.G

**INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

Handwritten signature:
M.A.G



OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406

091-9213445

No.Estb/OST/Orders/ 2449 1-

Dated 30/07/2015 1-

ORDER

Senior Technician (BPS-14) Javed Iqbal attached to Central Prison Bannu is now hereby attached to Central Prison Peshawar only for the purpose of duty, however, for the purpose of pay he will remain attached to Central Prison Bannu till further orders.

He should be relieved immediately by making local arrangements.

Endst; No. 2450-51 /...

Copy of the above is forwarded the:-

- (1) Superintendent Central Prison Peshawar.
- (2) Superintendent Central Prison Bannu.

For information and necessary action.

mmw 391
INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

mmw 391
INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR



OFFICE OF THE
INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR.

NO. 3/8947-2013/31486

DATED 22/12/2014

ORDER

In pursuance to Section-6 of the Khyber Pakhtunkhwa Right to Information Ordinance 2013 (Khyber Pakhtunkhwa Ordinance No.VII of 2013) , upon transfer of Mr.Zafar Iqbal Deputy Director, Miss.Aisha Rahat Psychologist(BPS-17) attached to this Inspectorate is hereby designated to act as Public Information Officer (PIO) in respect of Khyber Pakhtunkhwa Prisons Department. Mr.Izhar-ud-Din Computer Operator of this office will work with her for disposing off all cases under the subject cited ordinance .

The officer can be contacted on the following address, telephone/Fax number:-

1. Miss, Aisha Rahat,
Psychologist.
Office of the I.G.Prisons Khyber Pakhtunkhwa Peshawar.
2. Tele Office No.9212173.
3. Fax No.9213445

ENDST;NO. 31487-512

mmu 22/12
INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR.

Copy of the above is forwarded to :-

1. The Secretary to Government of Khyber Pakhtunkhwa Home & T.As Department Peshawar, for information with reference to this office endst;No.18273-300 dated 02-7-2014
2. All Superintendents of Jails/Lockups/ Internment Centres in the Khyber Pakhtunkhwa for information.
3. Miss Aisha Rahat Psychologist Prisons Inspectorate Peshawar for information.
4. Mr.Izhar-ud-Din Computer Operator for compliance.

mmu 22/12
INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR.

2752

26/12/14

3-B

File