

20th Oct., 2022

Junior to counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

Request for adjournment was made on behalf of learned senior counsel for the petitioner due to his engagement before the Hon'ble High Court today. Adjourned. To come up for arguments on 19.12.2022 before D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

24.11.2021 Proper DB is not available, therefore, the case is
adjourned to 1/3/22 for the same ^{as} before.

1-3-22

Due to submissment of the Hon,ble Chairman
the case is adjourned to come up for the
Same as before on 16-6-22

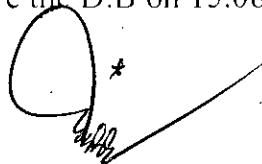
Reader

M. A. Khan
Reader

16.06.2022

Learned counsel for the appellant present. Mr. Suleman, Senior
Instructor alongwith Mr. Kabirullah Khattak, Additional Advocate General
for the respondents present.

Para-wise comments on behalf of respondents submitted, which are
placed on file. Adjourned. To come up for rejoinder, if any, as well as
arguments before the D.B on 15.08.2022.



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

15.8.22

Due to summer vacation, the case is
adjourned to 20-10-22 for the same.

J. Reader
Reader

09.07.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 26.11.2021 before the D.B.

Appellant Deposited
Security & Process Fee

14/7/21




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 5724 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/05/2021	<p>The appeal of Mr. Muhammad Sajid resubmitted today by Mr. Waheed Iqbal Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	03/06/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/07/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>

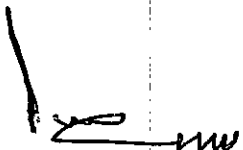


The appeal of Mr. Muhammad Sajjid son of Spin Badshah Ex Jail Warder received today i.e. on 26.05.2021 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Annexures-A and C of the appeal are illegible which may be replaced by legible/better one.
- 2- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.

No. 897 /S.T.


Dt. 27/05 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Waheed Iqbal Adv. Pesh.

- ① Better copies of Annexure A and C are submitted now.
- ② None of the said copies have been received to the appellants and ex-parte action was initiated against the appellants as evident from the impugned office order dt 17/2/2021 available on page-44 of the appeal, that is why none of the said copies are attached with the appeal.
- ③ Copy of departmental ^{appeal} is attached which is available on page-45 of the appeal.

Dated 28⁰⁵
2021

Resubmitted

(MEHER GUL)
Advocate

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 5724 of 2021

Muhammad Sajid (Jail Warder) Appellant

VERSUS

Govt of Khyber Pakhtunkhwa through Chief
Secretary, Civil Secretariat Peshawar and others
... .. Respondents

Index

S.No.	Description of documents	Annexure	Pages
1)	Memo of service appeal along with affidavit		1-7
2)	Application for condonation of delay if any along with affidavit		8-10
3)	Copy of appointment order dated 04/10/2019	"A"	11-13
4)	Copy of medical record	"B"	14-43
5)	Copy of office order dated 17/02/2021	"C"	44
6)	Copy of departmental appeal	"D"	45
7)	Copy of reminder application dated 18/05/2021	"E"	46
8)	Wakalat Nama	In original	47

Dated 26/05/2021

M- Sajid

Appellant

Through

Waheed Iqbal

& member

Meher Gul

Anwar Zeb

Advocates

High Court Peshawar

Cell # 0345-9058378

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____ of 2021

Muhammad Sajid S/o Spin Badshah (Jail Warder)
R/o Village Asot Kala P/O Ahmed Abad Tehsil &
District Takhti Nasrati District Karak.

... .. Appellant

VERSUS

- 1- Govt of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar
- 2- Secretary Hom Khyber Pakhtunkhwa Peshawar
- 3- Superintendent Head Quarter Prison Peshawar
- 4- Inspector General of Prisons Khyber Pakhtunkhwa Peshawar
- 5- Assistant Director Inspectorate General of Khyber Pakhtunkhwa Prisons Peshawar.

... .. Respondents

**APPEAL UNDER SECTION 4 OF SERVICE
TRIBUNAL ACT 1974 AGAINST THE
OFFICER ORDER NO.566-P/B DATED
17/02/2021 OF RESPONDENT NO.3
WHEREBY THE APPELLANT WAS
AWARDED MAJOR PENALTY OF
REMOVAL FROM SERVICE, WHERE
AFTER THE APPELLANT PREFERRED
DEPARTMENTAL APPEAL ON DATED
22/02/2021 TO RESPONDENT NO.4 WHICH
IS NOT RESPONDED TILL DATE DESPITE
REMINDER DATED 18/05/2021 BY THE
APPELLANT.**

Prayer in Appeal:

On acceptance of the instant service appeal, the impugned office order No.566-P/B dated 17/02/2021 of respondent No.3 be set aside and the appellant be absolved of all the alleged charges leveled against the appellant, and the respondents be directed to reinstate the appellant in service with all back benefit. Any other relief deem fit and proper in the circumstance of the case may also be granted to the appellant.

Respectfully Sheweth:

Facts giving rise to this service appeal are as under:

- 1) That the appellant was duly appointed against the post of Warder (BPS 05) in the Khyber Pakhtunkhwa Prison Deptt: after completing all codal formalities. (Copy of appoint order dated 04/10/2019 is annexed as Annexure "A").*
- 2) That the appellant was performing his duties honestly and the best of ability and to the satisfaction of his seniors. But in the month of July 2020 the appellant suffered from acute pain in his right kidney due to stone as per ultrasound report.*
- 3) That the diseases of appellant aggravated despite continues treatment due to which the appellant was unable to perform duty in such situation. (Copy of Medical Record is annexed as Annexure "B").*

(3)

- 4) That one day the appellant managed to approach his place of duty in miserable and painful condition, where he got received his removal order dated 17/02/2021, where upon the appellant came to know that through an exparte action the appellant has been awarded major penalty of removal from service. (Copy of Office order dated 17/02/2021 is annexed as Annexure "C").
- 5) That thereafter on 22/02/2021 the appellant preferred departmental appeal to respondent No.4 but it was not responded to even after the lapse of 72 /73 days. (Copy of Departmental appeal is annexed as Annexure "D").
- 6) That in order to ascertain the fate of his departmental appeal dated 22/02/2021, the appellant filed a reminder to respondent No. 4, but the official concerned did not bothered to entertain the appellant. (Copy of Reminder dated 18/05/2021 is annexed as Annexure "E").
- 7) That the office order dated 17/02/2021 of awarding major penalty of removal from service is illegal, unlawful, void ab-initio, without jurisdiction and the same is liable to set aside inter-alia on the following grounds;

GROUNDS:

- A) That the impugned officer order dated 17/02/2021 is against the law and facts hence, not tenable in the eyes of law.
- B) That no charge sheet , statement of allegation has never been served upon the appellant and if at all, the appellant would definitely submit his reply and avail the opportunity of personal hearing.
- C) That similarly no final show cause notice has ever been served upon the appellant at his home address. Had it been so, the appellant would have appeared before the inquiry officer for defending himself.
- D) That it is also worth to mention that no absence notice in respect of the appellant has ever been published in any news paper and the whole proceeding have been initiated ex parte against the appellant as evident from the impugned office order.
- E) That in view of the above grounds, the appellant has not been afforded opportunity to defend himself rather the appellant was condemn unheard, hence on this score too the

(5)

impugned office order is nullity in the eyes of law.

F) That the appellant has never done misconduct rather the appellant was suffering from acute kidney pain etc and was under going continues medical treatment, so was unable to perform his duty.

G) That the appellant has never absented intentionally, as evident from medical record, so allegation of professional misconduct is totally baseless, therefore, imposing major penalty of removal from service is illegal and unwarranted under the law and facts of the case.

H) That appellant being low paid Government servant, have no source of income, deserve to be treated leniently and the impugned order being harsh and cruel is liable to be set aside.

(6)

I) That the appellant seeks leave of this Hon'ble Tribunal to rely on additional grounds at the time of hearing of this appeal.

It is, therefore, most humbly prayed that the instant service appeal may kindly accepted as prayed for in the heading of this appeal.

Dated 26/05/2021

M. SaJid

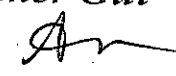
Appellant

Through

Waheed Iqbal

& 

Meher Gul



Anwar Zeb

Advocates

High Court Peshawar

Verification;

Verified as per instruction of my client no such like service appeal has earlier been filed before this Hon'ble Tribunal.

Advocate



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____ of 2021

Muhammad Sajid (Jail Warder) Appellant

VERSUS

Govt of Khyber Pakhtunkhwa through Chief
Secretary, Civil Secretariat Peshawar and others
... .. Respondents

Affidavit

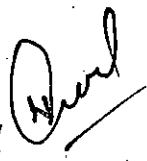
I, Muhammad Sajid S/o Spin Badshah (Jail
Warder) R/o Village Asot Kala P/O Ahmed Abad Tehsil
& District Takhti Nasrati District Karak do hereby
solemnly affirm and declare on oath that the contents of
the accompanying service appeal are true and correct to
the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Tribunal.

M- saJid

Deponent

CNIC # 14203-6761653-7

Identified by

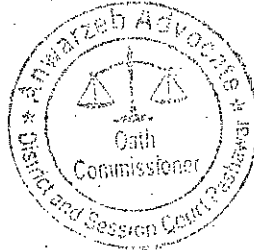


Waheed Iqbal

Advocate

High Court Peshawar


ATTESTED



(8)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____ of 2021

Muhammad Sajid (Jail Warder) Appellant

VERSUS

Govt of Khyber Pakhtunkhwa through Chief
Secretary, Civil Secretariat Peshawar and others
... .. Respondents

**APPLICATION FOR CONDONATION
OF DELAY IF ANY.**

Respectfully Sheweth:

That applicant / appellant submits as under:

- 1) That the applicant has filed the titled appeal before this Hon'ble Tribunal in which no date is yet fixed.
- 2) That the contents of the titled appeal may kindly be read as integral part of this application.
- 3) That the applicant preferred departmental appeal and after the lapse of 72/73 days filed reminder on dated 17/05/2021 about the fate of his departmental appeal. But the applicant was not entertained by the official concerned.
- 4) That keeping the circumstance and fact of the case the instant appeal is will within time. But the applicant seeks condonation of delay if any in filing the instant appeal.

(9)

- 5) That in view of Section 30 of Khyber Pakhtunkhwa and pandemic control and relief Act 2020 and subsequent notification U/S 30 ibid by the Health Department the limitation shall remain frozen, so in light of the said provision the applicant seeks condonation as well.
- 6) That additional grounds may be raised at time of argument with the prior permission of this Hon'ble Tribunal.
- 7) That valuable right of the applicant are attached with the instant appeal.

It is, therefore, most respectfully prayed that the instant application may graciously be accepted and the delay if any may kindly be condoned in the best interest of justice. And the appeal be decided on merits and technicality may kindly be avoided.

Dated 26/05/2021

M. Sa'id

Appellant

Through

Waheed Iqbal

& 

Meher Gul



Anwar Zeb

Advocates

High Court Peshawar

(10)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____ of 2021

Muhammad Sajid (Jail Warder) Appellant

VERSUS

Govt of Khyber Pakhtunkhwa through Chief
Secretary, Civil Secretariat Peshawar and others
... .. Respondents

Affidavit

I, Muhammad Sajid S/o Spin Badshah (Jail
Warder) R/o Village Asot Kala P/O Ahmed Abad Tehsil
& District Takhti Nasrati District Karak do hereby
solemnly affirm and declare on oath that the contents of
the accompanying application for condonation of delay
if any are true and correct to the best of my knowledge
and belief and nothing has been concealed from this
Hon'ble Tribunal.

M - Sajid

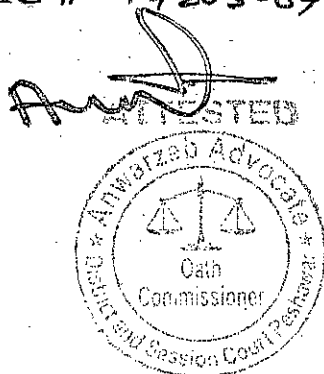
Deponent

CNIC # 14203-676/653-7

Identified by

Waheed Iqbal
Advocate

High Court Peshawar



(11)

17/05/2019 A3

**SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR**
No: 736-ASS P/B Dt: 04/10/2019

OFFER OF APPOINTMENT

Upon recommendation of the Departmental Selection Committee the below noted candidates of Zone-4 are hereby appointed against the post of Warders (BPS-05) in the Khyber Pakhtunkhwa Department in Basic Pay Scale Rs. (10260-500-2520) plus the usual allowances on the following terms and conditions -

Sl No	Name	Father Name	Domicile District	Place of Posting
1	Kamran Ali Shah	Ahmad Ali Shah	Bannu	Central prison Peshawar
2	Muneeb Iqbal Khan	Muhammed Iqbal Khan	Bannu	Central prison Peshawar
3	Ali Raza	Khadim Raza	Lakki Marwat	Central prison Peshawar
4	Hafeed Ullah	Hassan Khan	Lakki Marwat	Central prison Peshawar
5	Atteef Ullah Khan	Mira Khan	Bannu	Central prison Peshawar
6	Azhar Ullah Khan	Inayat Ullah Khan	Lakki Marwat	Central prison Peshawar
7	Asamat Ullah Khan	Umer Qadir Khan	Bannu	Central prison Peshawar
8	Afaq Ahmad	Umer Nazir Khan	Bannu	Central prison Peshawar
9	Ihsanullah	Sardar Khan	Lakki Marwat	Central prison Peshawar
10	Shaheed Ullah	Kamal Khan	Lakki Marwat	Central prison Peshawar
11	Muhammad Muneer Khan	Abdullah Khan	Lakki Marwat	Central prison Peshawar
12	Imran Ullah	Ghulam Rehman	Lakki Marwat	Central prison Peshawar
13	Irfan Ullah	Gul Mazhar Khan	Lakki Marwat	Central prison Peshawar
14	Abdul Qayyum Khan	Sardar Khan	Bannu	Central prison Peshawar
15	Zafar Iqbal Khan	Syed Raza Khan	Bannu	Central prison Peshawar
16	Usama	Abdul Qadir Khan	Bannu	Central prison Peshawar
17	Muhammad Sayd	Sreen Bait Shah	Bannu	Central prison Peshawar
18	Khurram Shahzad Hussain	Husan Zaman	Bannu	Central prison Peshawar
19	Izhar Ullah	Syed Am	Lakki Marwat	Central prison Peshawar
20	Farman Ullah	Jamal Ullah	Karak	Central prison Peshawar
21	Zakerullah	M Usman	Bannu	Central prison Peshawar
22	Ibrahim Sajid	Sajid Ur Rehman	Karak	Central prison Peshawar
23	Fahad Ullah Khan	Farman Ullah Khan	Lakki Marwat	Central prison Peshawar
24	Waqas Khan	Aeq Khan	Bannu	Central prison Peshawar
25	Shadab Khan	Gul Raul Khan	Bannu	Central prison Peshawar
26	Imdad Ullah	Muhammad Raizman	Lakki Marwat	Central prison Peshawar
27	Majid Haroon	Fazal Ehsan	Karak	Central prison Peshawar
28	Muhammad Ishaq Khan	Muhammad Saeed Khan	Lakki Marwat	Central prison Peshawar
29	Attab Khan	Akbar Ali Khan	Lakki Marwat	Central prison Peshawar
30	Shahrukh Kamal	Kamal Khan	Bannu	Central prison Peshawar
31	Syad Khan	Rafi Ullah Khan	Bannu	Central prison Peshawar
32	Numair Ali Shah	Amir Jamal Ullah Khan	Bannu	Central prison Peshawar
33	Abdul Saboor Khan	Mahmood Khalil	Bannu	Central prison Peshawar
34	Khalid Mahmood	Lal Zaman	Kohat	Central prison Peshawar
35	Asif Ullah	Aizal Khan	Karak	Central prison Peshawar
36	Zahid Alam	Rasool Khan	Karak	Central prison Peshawar
37	Talha Khan	Aslam Khan	Bannu	Central prison Peshawar
38	Yash Khan	Umer Khan	Bannu	Central prison Peshawar
39	Asad Naeem	Halder Ali Khan	Karak	Central prison Peshawar
40	Asad Hayat	Shaukat Hayat	Karak	Central prison Peshawar
41	Muhammad Javed	Namat Ullah	Lakki Marwat	Central prison Peshawar
42	Wasim Khan	Nader Khan	Bannu	Central prison Peshawar
43	Syaid Zafar	Zafar Ul Islam	Karak	Central prison Peshawar
44	Sulman Khan	Muhammad Khan	Lakki Marwat	Central prison Peshawar
45	Zahid Jami	Jala Pur	Karak	Central prison Peshawar
46	Ahsan Iqbal	Dilwar Khan	Karak	Central prison Peshawar
47	Amir Saeed	Gul Saeed	Karak	Central prison Peshawar
48	Syad Ullah	Azim Khan	Lakki Marwat	Central prison Peshawar
49	Zafar Qyas	Muhammad Rafiq	Karak	Central prison Peshawar

HEADQUARTERS PRISON PESHAWAR

OFFICE OF THE
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
No. _____ P/B DI 04/10/2-19

Sr	Name	Father Name	Domicile District	Place of Residence
50	Wahid Ur Rehman	M. Ishaq
51	Gultayaz
52	Muhammad Tariq Khan
53	Shahid Nawab
54	Zahid Ullah Khan
55	Sajed Khan
56	Arfan Ullah
57	Muhammad Shoaib Khan
58	Behran Khan
59	Naseeb Ullah
60	Irshad Ullah Khan
61	Umer Nawaz Khan
62	Muhammad Sajid Rauf
63	Shahid Ullah Khan
64	Muhammad Umer Nawaz
65	Mohsin Habib
66	Mikmal Nawaz Khan
67	Nadeem Khan
68	Abdullah
69	Muhammad Selim
70	Hamayun Saif Ullah
71	Saeed Khan
72	Shahadat Khan
73	Wasim Andesh
74	Zarnat Ullah Khan
75	Tahir Zaman
76	Inam Ullah Khan
77	Tufail Khan
78	Mohsin Khan
79	Abdul Wahab Khan
80	Irshad Ullah
81	Mehran Ullah Khan
82	Yaqub Khan
83	Irshad Ullah
84	Inam Ullah
85	Rashed Iqbal
86	Sohail Tanzeem
87	Amin Ullah
88	Sohail Ur Rahman
89	Irshad Ullah
90	Roohan Khan
91	Mansoor Ullah Khan
92	Shahzeb Khan
93	Shahzad Khan
94	Suleman
95	Zafar Hayat
96	Rizal Usman
97	Abdul Samad Khan
98	Ahmad Ali Khan
99	Muhammad Junaid Iqbal
100	Wahid Ur Rehman
101	Abid Ullah Khan
102	Sajid Ullah
103	Sahib Ullah Khan

Handwritten signature and stamp on the left margin.

100
 101
 102
 103
 104
 105
 106
 107
 108
 109
 110
 111
 112
 113
 114
 115
 116
 117
 118
 119
 120

COMMIT ONE

The following is a list of the names of the persons who have been committed to the institution under the provisions of the Act of March 3, 1875, and who are now in the institution.

The names are arranged in alphabetical order.

The names of the persons who have been committed to the institution under the provisions of the Act of March 3, 1875, and who are now in the institution, are as follows:

The names of the persons who have been committed to the institution under the provisions of the Act of March 3, 1875, and who are now in the institution, are as follows:

The names of the persons who have been committed to the institution under the provisions of the Act of March 3, 1875, and who are now in the institution, are as follows:

BETTER COPY

Better Copy

Office of the
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
No.736-855 P/B Dt: 04/10/2019

OFFER OF APPOINTMENT

OFFER OF APPOINTMENT

Upon recommendation of the Department Section Committee, the below noted candidate of Zone-4 are hereby appointed against the post of Warders (BPS-05) in the Khyber Pakhtunkhwa Prisons Department in Basic Pay Scale Rs.(10260-500-25290) plus other usual admissible allowances on the following terms and conditions

S#	Name	Father name	Domicile District	Place of Posting
1	Kamran Ali Shah	Ahmad Ali Shah	Bannu	Central Prison Peshawar
2	Muneeb Iqbal Khan	Muhammad Iqbal Khan	Bannu	Central Prison Peshawar
3	Ali Raza	Khadim Raza	Lakki Marwat	Central Prison Peshawar
4	Naveed Ullah	Hassan Khan	Lakki Marwat	Central Prison Peshawar
5	Atteef Ullah Khan	Mira Khan	Bannu	Central Prison Peshawar
6	Azhar Ullah Khan	Inayat Ullah Khan	Lakki Marwat	Central Prison Peshawar
7	Asamat Ullah Khan	Umer Qiaz Khan	Bannu	Central Prison Peshawar
8	Afaq Ahmad	Umer Nawaz Khan	Bannu	Central Prison Peshawar
9	Ihsanullah	Sardaraz Khan	Lakki Marwat	Central Prison Peshawar
10	Shaheed Ullah	Kamal Khan	Lakki Marwat	Central Prison Peshawar
11	Muhammad Muneer Khan	Abdullah Khan	Lakki Marwat	Central Prison Peshawar
12	Imran Ullah	Ghulam Rabbani	Lakki Marwat	Central Prison Peshawar
13	Iran Ullah	Gul Muzaffar Khan	Karak	Central Prison Peshawar
14	Abdul Qayyum Khan	Sahib Nawaz Khan	Bannu	Central Prison Peshawar
15	Zafar Iqbal Khan	Syed Rasool Khan	Bannu	Central Prison Peshawar
16	Usama	Abdul Qayum Khan	Bannu	Central Prison Peshawar
17	Muhammad Sajid	Speen Bad Shah	Karak	Central Prison Peshawar
18	Khurram Shahzad Hussain	Hasan Zamir	Karak	Central Prison Peshawar
19	Izhar Ul Haq	Syed Amir	Lakki Marwat	Central Prison Peshawar
20	Farman Ullah	Jamal Uddin	Karak	Central Prison Peshawar
21	Zakerullah	M Usman	Bannu	Central Prison Peshawar
22	Ibrahim Sajid	Sajid Ur Rehman	Karak	Central Prison Peshawar
23	Fahad Ullah Khan	Farman Ullah Khan	Lakki Marwat	Central Prison Peshawar
24	Waqas Khan	Aziz Khan	Bannu	Central Prison Peshawar
25	Shaqiaz Khan	Gul Rauf Khan	Bannu	Central Prison Peshawar
26	Imdad Ullah	Muhammad Ramzan	Lakki Marwat	Central Prison Peshawar
27	Majid Haroon	Fazal Elahi	Kohat	Central Prison Peshawar
28	Muhammad Ishaq Khan	Muhammad Saeed Khan	Lakki Marwat	Central Prison Peshawar
29	Aftab Khan	Akbar Ali Khan	Lakki Marwat	Central Prison Peshawar
30	Shahrukh Kamal	Kamal Khan	Bannu	Central Prison Peshawar
31	Shad Khan	Rafi Ullah Khan	Bannu	Central Prison Peshawar
32	Numair Ali Shah	Amir Jamal Ullah Shah	Bannu	Central Prison Peshawar
33	Abdus Saboor Khan	Mahmood Khan	Bannu	Central Prison Peshawar
34	Khalid Mehmood	Lal Zaman	Kohat	Central Prison Peshawar
35	Asif Ullah	Afzal Khan	Karak	Central Prison Peshawar
36	Zahid Alam	Rasool Khan	Karak	Central Prison Peshawar
37	Talha Khan	Aslam Khan	Bannu	Central Prison Peshawar
38	Yasir Khan	Umer Khan	Bannu	Central Prison Peshawar
39	Asad Naeem	Haider Ali Khan	Karak	Central Prison Peshawar
40	Asad Hayat	Shaukat Hayat	Karak	Central Prison Peshawar
41	Muhammad Javed	Niamat Ullah	Lakki Marwat	Central Prison Peshawar
42	Wasim Khan	Nader Khan	Bannu	Central Prison Peshawar
43	Junaid Zafar	Zafar Ul Islam	Karak	Central Prison Peshawar
44	Suliman Khan	Muhammad Khan	Lakki Marwat	Central Prison Peshawar
45	Zahid Jalil	Jala Pur	Karak	Central Prison Peshawar
46	Ahsan Iqbal	Dilawar Khan	Karak	Central Prison Peshawar
47	Amir Saeed	Gul Saeed	Karak	Central Prison Peshawar
48	Safat Ullah	Azim Khan	Lakki Marwat	Central Prison Peshawar
49	Zafar Qiyas	Muhammad Rafiq	Karak	Central Prison Peshawar

Office of the
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
No.736-855 P/B Dt: 04/10/2019

S#	Name	Father name	Domicile District	Place of Posting
50	Walid-Ur Rehman	M Ismal	Lakki Marwat	Central Prison Peshawar
51	Gultayaz	Gulnawaz	Lakki Marwat	Central Prison Peshawar
52	Muhammad Tariq Khan	Khan Wali	Lakki Marwat	Central Prison Peshawar
53	Shahid Nawab	Nawab Khan	Lakki Marwat	Central Prison Peshawar
54	Zahid Ullah Khan	Moin Ullah Khan	Bannu	Central Prison Peshawar
55	Sajed Khan	Ayub khan	Bannu	Central Prison Peshawar
56	Arfan Ullah	Asal gul	Karak	Central Prison Peshawar
57	Muhammad Shoaib Khan	Noor Ali Khan	Lakki Marwat	Central Prison Peshawar
58	Behram Khan	Muammad Ayub	Lakki Marwat	Central Prison Peshawar
59	Naseeb Ullah	Shukat Khan	Karak	Central Prison Peshawar
60	Irshad Ullah Khan	Shamsuddin	Lakki Marwat	Central Prison Peshawar
61	Umer Nawaz Khan	Mamtaz Khan	Bannu	Central Prison Peshawar
62	Muhammad Sajid Rauf	Muhammad Rauf	Karak	Central Prison Peshawar
63	Shahid Ullah Khan	Zaka Ullah Khan	Lakki Marwat	Central Prison Peshawar
64	Muhammad Umer Nawaz	Afsar Khan	Lakki Marwat	Central Prison Peshawar
65	Moshin	Umar Habib Khan	Bannu	Central Prison Peshawar
66	Hikmat Nawaz khan	Falak Naz Khan	Bannu	Central Prison Peshawar
67	Nadeem Khan	Hamid Ullah Khan	Bannu	Central Prison Peshawar
68	Abdullah	Muhammad Saeed	Kohat	Central Prison Peshawar
69	Muhammad Salim	Noor Muhammad Khan	Karak	Central Prison Peshawar
70	Hamayoon Saif Ullah	Abdul Saboor	Karak	Central Prison Peshawar
71	Siraj Ali Khan	Muhammad	Bannu	Central Prison Peshawar
72	Shahadat Khan	Jamal Khan	Lakki Marwat	Central Prison Peshawar
73	Wasim Andesh	Atta Ullah Khan	Bannu	Central Prison Peshawar
74	Zeenat Ullah Khan	Kashmir Khan	Bannu	Central Prison Peshawar
75	Tahir Zaman	Abdul Khaliq Shah	Lakki Marwat	Central Prison Peshawar
76	Inam UL Haq Shah	Umer Niazh Shah	Bannu	Central Prison Peshawar
77	Tufail Khan	Taj Muhammad Khan	Bannu	Central Prison Peshawar
78	Mohsin Khan	Muhammad Nisar	Bannu	Central Prison Peshawar
79	Abdul Wahab Khan	Shadawaz Khan	Bannu	Central Prison Peshawar
80	Irfan Ullah	Habib Ullah	Lakki Marwat	Central Prison Peshawar
81	Mehran Ullah Khan	Khan Shahzada	Bannu	Central Prison Peshawar
82	Yaqub Khan	Raqeeb khan	Bannu	Central Prison Peshawar
83	Irshad Khan	Amir Jan	Lakki Marwat	Central Prison Peshawar
84	Ihsan Ullah	Wali Khan	Lakki Marwat	Central Prison Peshawar
85	Rashid Iqbal	Khalid Iqbal	Karak	Central Prison Peshawar
86	Sohail Tanveer	Zahid Ullah Khan	Lakki Marwat	Central Prison Peshawar
87	Amin Ullah	Aman Ullah Khan	Bannu	Central Prison Peshawar
88	Sohaib ur Rehman	Habib ur Rehman	Bannu	Central Prison Peshawar
89	Irshad Ullah	Eidbad Shah	Lakki Marwat	Central Prison Peshawar
90	Rooman Khan	Hakim Khan	Bannu	Central Prison Peshawar
91	Hamid Ullah Khan	Habib Khan	Lakki Marwat	Central Prison Peshawar
92	Shahzeb Khan	Farid Ullah Khan	Lakki Marwat	Central Prison Peshawar
93	Shehzad Khan	Muhammad Ayuz Khan	Lakki Marwat	Central Prison Peshawar
94	Suleman	Saleem Khan	Karak	Central Prison Peshawar
95	Zafar Hayat	Hamagun Khan	Karak	Central Prison Peshawar
96	Bilal Usman	Gul Shahbaz	Karak	Central Prison Peshawar
97	Abdul Samad Khan	Haji Bahadar Khan	Bannu	Central Prison Peshawar
98	Ashraf Ali Khan	Zafar Ullah Khan	Lakki Marwat	Central Prison Peshawar
99	Muhammad Junaid Iqbal	Muhammad Iqbal Khan	Lakki Marwat	Central Prison Peshawar
100	Wasim Ur Rehman	Altaf Hussain	Karak	Central Prison Peshawar
101	Abid Ullaha Khan	Nazra Ali Khan	Bannu	Central Prison Peshawar
102	Saqab Ullah	Abdur Razaq Khan	Bannu	Central Prison Peshawar
103	Sana Ullah Khan	Sharif Ullah	Lakki Marwat	Central Prison Peshawar

CONDITIONS

1. Their appointment will take effect from the date of joining duty at their place of posting.
2. Their appointment is purely temporary and their services are liable to be terminated at any time on 15 days' notice without assigning any reasons.
3. No TA/DA will be admissible to them for joining first appointment.
4. In case they wish to resign at any time they will give one month notice OR in lieu thereof one month's pay will be forfeited from them subject to the discretion of the competent authority in public interest and will leave the service after acceptance of their resignation.
5. Their appointment is subject to Medical fitness for Government service.
6. They will be eligible for continuance on the post if their work and conduct remained satisfactory during the period of their temporary appointment provided the vacancy against which they have been appointed continues.
7. They will be on probation for a period of one year extendable upto another year. During probation period their services will be terminated if their work and conduct is not found satisfactory or the vacancy ceases to exist.
8. They will be liable to serve anywhere in the prisons department of Khyber Pakhtunkhwa.
9. For all other purposes such as Pay, T.A and Medical Attendance etc, they will be governed by such Rules as may be issued by the Government for the category of Government Servants of the prisons department to which they will belong.
10. They will be governed by the Khyber Pakhtunkhwa Government Servants (conduct), Rules 1987, the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules 1986, the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Civil Servants (Appointment, promotion and Transfer) Rules 1989, the Khyber Pakhtunkhwa (E&D) Rules, 2012 the Khyber Pakhtunkhwa Prison Department Service Rules and all other rules/regulations framed or to be framed by the Government from time to time
11. Their services will be liable to termination/reversion at any stage if their Academic certificates / Degree (if any), CNIC, Domicile etc, are found fake, their services will be considered as terminated automatically and FIR will be lodged against them.
12. Their salary will be released after making proper verification of their antecedents/character roll, domicile, and Academic, Qualification certificates/ degrees etc, from the quarter concerned by the jail of their first posting. Moreover, if any verification charges are involved account, the same will be paid by the appointees.

S#	Name	Father name	Domicile District	Place of Posting
104	Atta Ullah Khan	Muhammad Iqbal Khan	Lakki Marwat	Central Prison Peshawar
105	Qudrat Ullah	Taj Ali Khan	Lakki Marwat	Central Prison Peshawar
106	Siraj Ahmad	Aqleem Khan	Karak	Central Prison Peshawar
107	Muhammad Ilyas	Sultan Ayaz	Karak	Central Prison Peshawar
108	Touseef Ahmad	Fateh Muhammad	Lakki Marwat	Central Prison Peshawar
109	Atif Ullah	Taj Malook	Karak	Central Prison Peshawar
110	Muhammad Yaseen	Naik Muhammad	Karak	Central Prison Peshawar
111	Safir Ullah Khan	FarmanUllah Khan	Bannu	Central Prison Peshawar
112	Asad Hayat	Abdur Rahim	Lakki Marwat	Central Prison Peshawar
113	Ihsan Ullah	Muhammad Tayb Ali Khan	Bannu	Central Prison Peshawar
114	Muhammad Kamran	Nadar Khan	Lakki Marwat	Central Prison Peshawar
115	Insha Ullah	Feroz Khan	Lakki Marwat	Central Prison Peshawar
116	Muhammad Qasim	Karim Dad Khan	Bannu	Central Prison Peshawar
117	Amjad Khan	Malik Zaman	Bannu	Central Prison Peshawar
118	Ataur Rahman	Mir Sarfaraz	Bannu	Central Prison Peshawar
119	Farzaid Ullah	Shah Zaib Khan Khan	Bannu	Central Prison Peshawar

(14)

Annexure B



Type C HOSPITAL KARAK CITY

(Khyber Pakhtunkhwa)

RADIOLOGY DEPARTMENT

Patient name	Sajid	Age	? Years
Ref by	Self	Date	10/02/2021

ULTRASOUND ABDOMEN & PELVIS

- **LIVER:** Is of normal size, shape and echo texture with smooth margins. No focal lesion seen.
 - **CBD & PORTAL VEIN:** Normal caliber.
 - **GALL BLADDER:** Appears normal.
 - **PANCREAS:** Appears normal in size, shape and parenchyma. No focal lesion seen.
 - **RIGHT KIDNEY:** Is of normal size, shape, Echogenicity and shows an about 4mm calculus in the lower calyx without causing obstructive changes.
 - **LEFT KIDNEY:** Is of normal size, shape & Echogenicity with no evidence of stone or hydronephrosis.
 - **SPLEEN:** Appears normal in size & texture. No focal lesion seen.
 - **ASCITES:** No evidence seen.
 - **URINARY BLADDER:** Normal.
- IMPRESSION:** Right Renal Calculus.

10691 (15)
DHO HOSPITAL KARAK

DHIS-02(F)

Sent To:

OUT DOOR PATIENT TICKET

District: _____ CRP No: 6188

Facility Name: _____

Name: PL Age: _____ Sex: _____

Father's/Husbands' Name: _____

Monthly OPD Serial No. _____

Provincial Diagnosis: _____

Date
23 12
20

Clinical Findings/Investions/Treatment/Test Findings

Go
Pain both loins
- 7 days

MS KUB

Tab Spirano 1000

1. —

Tab Moxiget 4000
Calmol

Citrosoda Sachet
MS

S No

DEPARTMENT OF RADIOLOGY
DHQ HOSPITAL KARAK

Monthly No.

Name

AS Liu

Unit / OPD

Age

Sex

ULTRASOUND FINDINGS:

Bed No.

Dated 23-12-20

	NORMAL	ABNORMAL	COMMENTS
Liver	✓		
Gall Bladder	✓		
Comm. Bile Duct	✓		
Portal Vein	✓		
Spleen	✓		
Pancreas	✓		
Rt. Kidney	✓		
Lt. Kidney	both	Kidneys	shows multiple calculi upto
Urinary Bladder	lumen	is with	no obstructive change
Prostate			Diffuse wall thickness
Uterus	✓		
Ovaries	/		
Ascites			
Lymph nodes	all		
Impression:	M		

Signature:

Radiologist

(16)

D.H.Q. TEACHING HOSPITAL BANNU (17)
Accident & Emergency Dept.

Name M. Yaqub Age 1973/1 Sex M
Address _____

Hospital Yearly No _____

Dated 29/7/24

Pt. Status:

Sever

100 Rate 75

Operative

(10) 121

Pt. Hist.

1st @
Esu

1st Ciprow 80
(10) 122

Clinical Examination

4/5 → @ 100/100
11/21

Cap Floueo
(10)

Provisional Diagnosis

Advent 1 week
rest 7/24
wah

Investigations Required

Dr. Harris Hamid FRCSEd
Assistant Professor of Urology
Bannu Medical College

18

Treatment at Home

10 — Asl
 10 — Drinks 75
 10 — 127
 10 — Polypep 20
 10 — Cap Prostan 0.5
 10 — 110



دوباره معائنہ کے لئے بعد تشریف لائیں

KHALIFA GUL NAWAZ TEACHING HOSPITAL



Head of Department
Incharge / Assistant Professor
Dr. Haris Hamid
F.C.P.S. urol

Junior Registrar
Dr. Amir Ghani
MS (1) Urol

Adm. No 5150820

Bed. No _____

Patient's Name Muhammad Sajid Age 26 / M

Address Korak

Contact No _____

D/A 12/8/2020 D/O _____ D/D 17/8/2020

Disease Post Rt URS (Fever)

Oferation _____

Investigations:

X-ray KUB

Surgeon

Dr. Hasis Hameed

Assistant

-

Anesthesia

-

Procedure

-

Finding

-

Treatment at Hospital

2/8/2020

Pass 1/0 wire

by Subcutan of 1/0 BD

w/ R/L IL W x BD

by Amikay 250 mg 1/0 BD

Tab Paracet 2 x TDS

13/8/2020

w/ Ameproc 40 mg

10

relax

TYPE-C-HOSPITAL CITY KARAK

(20)

Sent To:

OUT DOOR PATIENT TICKET

DHS-02(F)

District: _____

Facility Name: _____

Name: [Signature] Age: _____ Sex: _____

Father's/Husband's Name: _____

CRP No. 112

Monthly OPD Serial No: _____

Provisional Diagnosis: _____

Date

Clinical Findings/Investigations/Treatment/Test Findings

12/2

X-ray KUB

Class ②
Ryloci 84-①
Ryloci 84-①

D.H.Q TEACHING HOSPITAL BANNU

Accident & Emergency Deptt.

(21)

Name M-Sajid Age 197335 Sex M

Address Hospital Yearly No

Date 4/9/20

Pt. Status.

(R+) URST ICL + DJS 29.76
Stunk fero 4.9-20

Pt. Hist.

Rever
pam (R)

Clinical Examination

CBC Hb 2.16g/dl
WBC 0.9

Provisional Diagnosis

CAP prostatitis only
CAP GEPHOK 500mg

Investigations Required

Rest
Dialysis

42

(22)

TEAM-C

Rs. 20



Institute of Kidney Diseases Hayatabad Peshawar

MRNo. 3465140720 Patient Department

Rs. 20

No: _____
Name: M SAJID Age: 27-YEARS Sex: MALE

Department: UROLOGY Address: KARAK

Hospital Yearly No: _____ Visit No: 1 Dated: 30-JUL-20 08:42:55

History

Handwritten notes:
① 1 week pain → 1 week
+ Bx → infection.
↑ session ESWL → 23 July

Examination

Handwritten notes:
V/S 10.3 mm stone at VVJ
ē. Moderate H/DN + H/DU

Handwritten notes:
URS + ICE
Route

27/8/2020

Investigation

tas Taceflex P

Treatment

Tas Taceflex P
100, 750 mg
Cap Maxflex 0.5g
Environ 1000 mg
Rec 10 days

Plan



Assistant

(23)

Professor Dr. Haris Hamid

M.B.B.S (R.M.P), F.C.P.S (Urology)

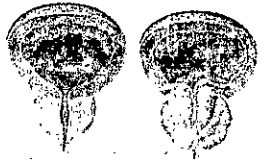
Department of Urology

Bannu Medical College

Incharge Urology Ward Khalifa Gul Nawaz Hospital Bannu

Member Pakistan Association of Urology Surgeon.

Member Society International D, Urology



Clinic:

Professor Medical Center

Opp. DHQ Hospital Bannu

Pt. Name:

M. Syid

Age/ Sex:

26y / m

Date:

4/8/20

Rx

کاپی

○ کھانے سے پہلے کھانے کے بعد ○

○ DTPS 250

○ کھانے سے پہلے کھانے کے بعد ○

○ DTPS 250

○ کھانے سے پہلے کھانے کے بعد ○

○ DTPS 250

○ کھانے سے پہلے کھانے کے بعد ○

○ DTPS 250

○ کھانے سے پہلے کھانے کے بعد ○

○ DTPS 250

○ کھانے سے پہلے کھانے کے بعد ○

○ Cap Prostam 0.4

○ DTPS 250
○ DTPS 250
○ DTPS 250
○ DTPS 250
○ DTPS 250

اسٹنٹ پروفیسر (پوراوجسٹ)

ڈاکٹر حارث حمید

ایم بی بی ایس (ار ایم بی)

ایف سی پی ایس (پیرالوجی)

انچارج ڈیپارٹمنٹ آف پیرالوجی

خلیفہ گل نواز ہسپتال بنوں

ماہر امراض: گردہ و مثانہ، پتھری، پراسٹیٹ، کینسر، مردانہ کمزوری و بانجھ پن

لیزر کے ذریعہ گردہ، مثانہ کی پتھری اور پراسٹیٹ امٹانہ کے گوشت کے آپریشن کی سہولت موجود ہے

چھٹی بروز اتوار ہوگی

دوبارہ معائنہ کیلئے دن بعد تشریف لائیں۔

0332-9701834

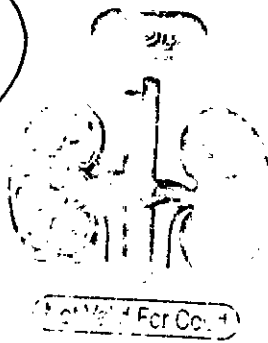
برائے رابطہ نمبر:

0332-5752554

0928-611111

کلینک: پروفیسر میڈیکل سنٹر بالٹھابیل DHQ ہسپتال بنوں

Assistant Prof
 Dr. Habib H. H. (circled)
 M.B.S (R.M.P)
 F.R.C.S (Urology)
 Department of Urology
 Bahau Medical College



اسٹنٹ پروفیسر
 ڈاکٹر حاجی حمید
 ایم بی بی ایس، (آر ایم پی)
 ایف سی پی ایس (یورالوجی)
 انجی رت، دیپارٹمنٹ آف یورالوجی
 خلیفہ گل نواز ٹیچنگ ہسپتال بنوں

Examination: Dr. Sajid Age: 26y Sex: M Date: 29/7/20

Re Exam f
 Ureter Ar
12

@ @ Ureter 111
 1073

سپیشلسٹ
 ڈاکٹر
 شہزاد
)

Toradol 100mg
)

@
 - FBL"
 - OCT 11113

- Pass Ureter
)
)
)

دوبارہ معائنہ کیلئے

5/7/2017

31/7/2017 5:10 PM

Spinal Anest

9u 10u 11u done

Soft spinal in Bilbe
used 500ml lidocaine 2% 500ml

① Dura multiple sh
fully fragmented

② Op passed

③ 13 hand
④ 14 hand

100% al

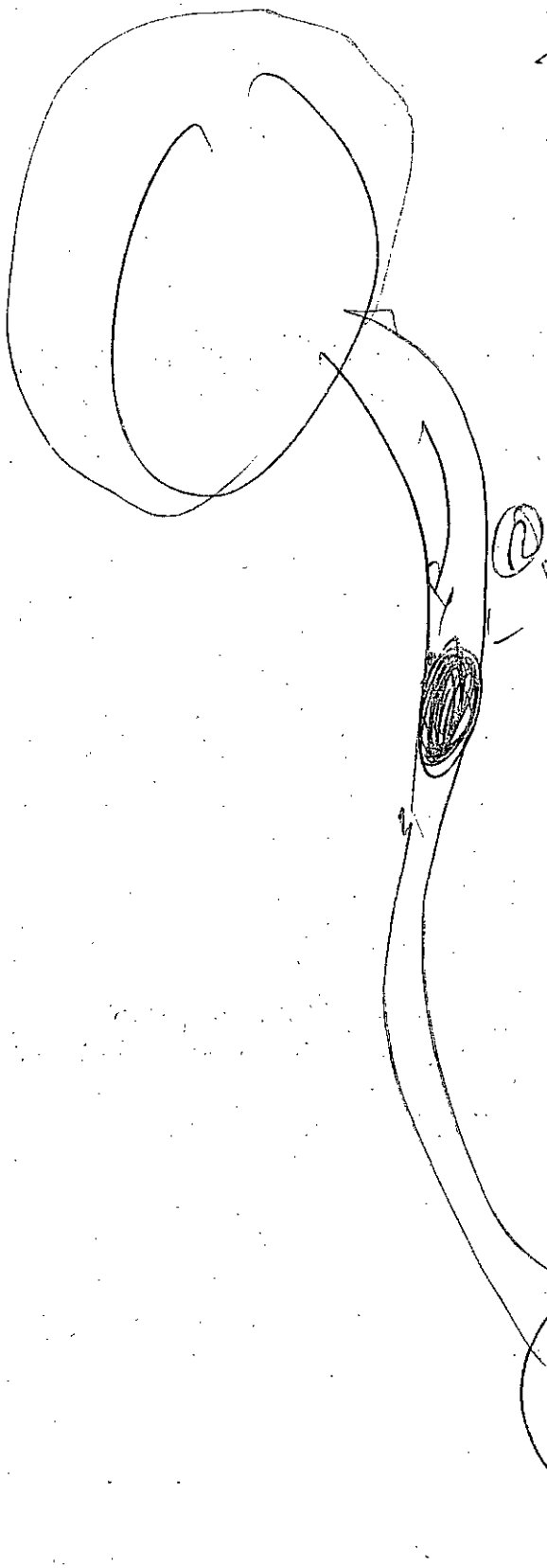
⑤ 15 hand
⑥ 16 hand

⑦ 17 hand
⑧ 18 hand

⑨ 19 hand
⑩ 20 hand

⑪ 21 hand
⑫ 22 hand

⑬ 23 hand
⑭ 24 hand



Assistant Professor

Dr. Akram Ullah Khattak



(25)

اسٹنٹ پروفیسر
ڈاکٹر اکرام اللہ خٹک

MBBS
FCPS (Surgery)
FCPS (Urology)

Urologist & Surgeon
Institute of Kidney Diseases
Hayatabad Peshawar.

Not Valid for Medical Legal Purpose

PMDC = 9036-N

ایم بی بی ایس
ایف سی پی ایس (سرجری)
ایف سی پی ایس (یورا لوجی)
یورا لوجسٹ اینڈ سرجن
اسٹیٹیوٹ آف کڈنی ڈیزیز
حیات آباد پشاور

Pt's Name Muhammad Sajid Age 76 Sex M Date 8.9.20

(R) URSTICL + DTS 29-7-70

Stent removed 4.9.20

90 Fever
Pain @ flank
ng

CRP 16.500
wbc/cmt 0.9
min ECF = 1000-12

u/s

X-Ray KUB

Imp @ Bact 28m 1/2 B/D

177

Tob Paracetol

2+2+2

Clap Prostact 0.4 up

Clap Ruling 20 up

Handwritten signature

دوبارہ معائنہ کیلئے دن بعد تشریف لائیں۔



Type C HOSPITAL KARAK CITY

(26)

(Khyber Pakhtunkhwa)
RADIOLOGY DEPARTMENT

Patient Name	Muhammad Sajid	Age	27 Years
Ref by	Self	Date	01/09/2020

ULTRASOUND ABDOMEN & PELVIS

1. **LIVER:** Is of normal size, shape and echo texture with smooth margins. No focal lesion seen.
2. **CBD & PORTAL VEIN:** Normal caliber.
3. **GALL BLADDER:** Appear normal.
4. **PANCREASE:** Appears normal in size, shape and parenchyma. No focal lesion seen.
5. **RIGHT KIDNEY:** Is of normal size, shape & Echogenicity with no evidence of stone or hydronephrosis. DJ stent seen in situ.
6. **LEFT KIDNEY:** Is of normal size, shape & Echogenicity with no evidence of stone or hydronephrosis.
7. **SPLEEN:** Appear normal in size and texture. No focal lesion seen.
8. **ASCITES:** No evidence seen.
9. **URINARY BLADDER:** Normal

IMPRESSION: Right DJ Stent with normal abdominal study.

(27)

بہتر صحت اور علاج سب کیلئے

ALFALAH DOPPLER ULTRASOUND

0335-5074112



Name: Mr M.Sajid

Date: 08/09/2020

Ref: by: Dr. Ikramullah Khattak

ULTRASOUND ABDOMEN

• LIVER

Shows smooth margins and normal echogenicity. No focal lesion or dilated channels seen. Portal vein has normal caliber.

• GALLBLADDER

Gallbladder is normal in size and shape. No mass, calculus or thickening of its wall is seen. No fluid collection is seen around it. CBD is of normal caliber.

• PANCREAS

It shows normal echotexture. No mass/ focal lesion is seen.

• SPLEEN

Spleen is normal in size and echopattern. No focal lesion is seen.

• RIGHT KIDNEY

Normal in size, shape and echotexture. Mild dilatation of pelvi-calyceal system is seen with few concretions. No mass, cyst, calculus is seen.

• LEFT KIDNEY

Normal in size, shape and echotexture. No mass, cyst, is seen.

• URINARY BLADDER

Normal wall thickness. No mass or calculus is seen.

> No para aortic lymphadenopathy is seen.

> No ascites is noted.

Prostate:

Normal in size, shape and echotexture. No mass, cyst, is seen.

Conclusion:

Δ Right sided mild hydronephrosis with concretions..

Dr Hafeeza zafar
M.Phil Radiology

3rd Floor, Khattak Medical Centre Dabbari Garden Peshawar

Not Valid For Medicolegal Purpose

(28)

The Bilal Laboratory



Add: Khattak Medicals Center
3rd Floor Dabgari Garden
Peshawar. Contact: 0342-9087949

AMMAD SAJID

DATE : 08/09/2020

TIME : 05:55:42

REPORT # : 8534

REFERRED BY : DR IKRAM ULLAH KHATTAK

TEST : BLOOD & URINE

REQUIRED : FBC/PLATELET COUNT, UREA, CREATININE, URINE R/E

FBC/PLATELET COUNT

	RESULT	UNITS	NORMAL RANGE
Haemoglobin	125.3 125.3	G/dl	M 14 ----- 18 F 12 ----- 16
TLC	16,500	/cmm	4000 - 11000
DIFFERENTIAL COUNT			
Neutrophils	89	%	40 ----- 70
Lymphocytes	08	%	20 ----- 40
Eosinophils	02	%	01 ----- 06
Monocytes	01	%	02 ----- 10
Platelet Count	2,95,000	/cmm	1,50,000 - 4,00,000

Iftikhar Ahmad
D. Path Pesh
Lab Tech
CGH Pesh Cantt

Bilal Ahmad
DMLT Pesh
Lab Tech
CGH Pesh Cantt

Dr. Abid Mansoor
M.Phil Micro Biology

Lab In charge

All queries/Discrepancies if any may be Referred to our Lab. Within 24 Hrs. Of reporting for re-evaluation/confirmation
Not Valid for medico Legal Purposes

The
Bio Check
Medical Laboratory



(29)

Add: Khattak Medicals Center
3rd Floor Dabgari Garden
Peshawar. Contact: 0342-9087949

NAME : MUHAMMAD SAJID

SEX : MALE

AGE : ?

SPECIMEN : BLOOD & URINE

TEST REQUIRED : FBC/PLATELET COUNT, UREA, CREATININE, URINE R/E

DATE : 08/09/2020

TIME : 05:55:42

REPORT # : 8534

REFERED BY : DR IKRAM U LLAH KHATTAK

RESULT

TEST	RESULT	UNITS	NORMAL RANGE
CREATININE	0.9	mg/dl	0.5 ----- 1.3
UREA	28	mg/dl	10 ----- 40

Iftikhar Ahmad
D. Path Pesh
Lab Tech
CGH Pesh Cantt //

Bilal Ahmad
DMLT Pesh
Lab Tech
CGH Pesh Cantt

Dr. Abid Mansoor
M.Phil Micro Biology

Lab Incharge

All queries discrepancies if any may be Referred to our Lab, Within 24 Hrs. Of reporting for re-evaluation / confirmation
Not Valid for Medico Legal Purposes

Surgeon Dr.

Rizwan Ahmad

M.B.B.S, FCPS

Surgical Specialist & Incharge

Surgical Unit D.H.Q Hospital Karak

Mob: 0333-9715423

Mob:0300-5766423..



(30)

سر جن ڈاکٹر رضوان احمد

ایم۔ بی۔ بی۔ ایس۔ ایف۔ سی۔ بی۔ ایس

سر جیکل سپیشلسٹ

انچارج سر جیکل یونٹ

ڈسٹرک ہیڈ کوارٹر ہسپتال کرک

Patient's Name MUHAMMAD SATID

Age 27

Sex M

Date 25/1/2020

Clinical Record

Post URS
PAIN IN
Both sides
Revert +
infection



① INT Sulbactam 2g
10 days

② Amik 250mg
10 day HI

③ Tab parada
HIHI

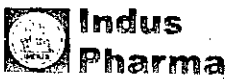
④ Tab Levofloxacin 500mg

⑤ Ciprofloxacin 500mg

⑥ TOLTRON

⑦ RIZEL

Bed rest for
five weeks



Surgeon Dr.

Rizwan Ahmad

M.B.B.S, FCPS

Surgical Specialist & Incharge

Surgical Unit D.H.Q Hospital Karak

Mob: 0333-9715423

Mob: 0300-5766423



(31)

سر جن ڈاکٹر رضوان احمد

ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ پی۔ ایس

سر جیکل سپیشلسٹ

انچارج سر جیکل یونٹ

ڈسٹرکٹ ہیڈ کوارٹر ہسپتال کرک

Patient's Name MUHAMMAD SAJID

Age 27 Sex M Date 20/09/2020

Clinical Record

post (RE)
URS (fever)
+
pain
+
infection

- ① 1000 Sulbactam 2g 10
- ② Amik 250mg 10
- ③ Ciprofloxacin 500mg 10
1+1
- ④ paradol 10 10
1+1+1
- ⑤ prostin 0.4mg 10
1+1
- ⑥ TOLTRON 10

Bed Rest give
weekly



Surgeon Dr.

Rizwan Ahmad

M.B.B.S, FCPS

Surgical Specialist & Incharge

Surgical Unit D.H.Q Hospital Karak

Mob: 0333-9715423

Mob: 0300-5766423



(32)

مسٹر جن ڈاکٹر رضوان احمد

ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ پی۔ ایس

سرجیکل سپیشلسٹ

انچارج سرجیکل یونٹ

ڈسٹرکٹ ہیڈ کوارٹر ہسپتال کرک

Patient's Name MUHAMMAD SAJID Age 27 Sex MALE Date 15/8/2020

Clinical Record

Ⓡ URS + KLT + DTJ



29.7.20

40 fever
pain Rt

① IMJ D. Bact 2g (10)
1+1

② cap pbs treat D. 4mg
(20) 1+1

③ Tab Nimeson 100mg
1+1 (10)

④ Tab CALCIVAN
1+1 (10)

Bed rest Rt
five weeks



The
Bio Check
Medical Laboratory



(33)
Add: Khattak Medicals Center
3rd Floor Dabgari Garden
Peshawar. Contact: 0342-9087949

NAME : MUHAMMAD SAJID

SEX : MALE

AGE : ?

SPECIMEN : BLOOD & URINE

TEST REQUIRED : FBC/PLATELET COUNT, UREA, CREATININE, URINE R/E

DATE : 08/09/2020

TIME : 05:55:42

REPORT # : 8534

REFERRED BY : DR IKRAM U LLAH KHATTAK

URINE R/E

PHYSICAL EXAMINATION

Quantity	20 ml
Colour	Pale Yellow
pH	Acidic

CHEMICAL EXAMINATION

Albumin	+
Sugar	Nil

MICROSCOPIC EXAMINATION

Pus Cells	08---10	/HPF
Red Cells	04---06	/HPF
Epith Cells	Nil	/HPF
Ca. Oxalate	Nil	

Iftikhar Ahmad
D. Path Pesh
Lab Tech
CGH Pesh Cantt

Bilal Ahmad
OMLT Pesh
Lab Tech
CGH Pesh Cantt

Dr. Abid Mansoor
M.Phil Micro Biology

Lab In charge

All queries/Discrepancies if any may be Referred to our lab Within 24 Hrs. Of reporting for re-evaluation/confirmation
Not valid for medico-legal purposes

THE CLINIC OF DIAGNOSTIC & DOPPLER ULTRASOUND

Dr. Danish Iqbal Khattak

M.B.B.S (KMC)

FCPS-II Radiology

Radiology Unit (KTH)

(34)

ڈاکٹر دانش اقبال خٹک

ایم بی بی ایس (کے ایم سی)

ایف سی پی ایس۔ ٹو (ریڈیالوجی)

ریڈیالوجی یونٹ کے ٹی ایچ

DIUC

Patient Name	Muhammad Sajid	Age	27 Years
Ref by	Self	Date	26/07/2020

Ultrasound Abdomen & Pelvis

- **LIVER:** Is of normal size, shape and echo texture with smooth margins. No focal lesion seen.
- **CBD & PORTAL VEIN:** Normal caliber.
- **GALL BLADDER:** Appear normal.
- **PANCREAS:** Appears normal in size, shape and parenchyma. No focal lesion seen.
- **RIGHT KIDNEY:** An about 12.5mm calculus seen in the mid ureter causing obstruction with resultant mild to moderate hydronephrosis of pelvicalyceal system and proximal hydroureter.
- **LEFT KIDNEY:** Is of normal size, shape & Echogenicity with no evidence of stone or hydronephrosis.
- **SPLEEN:** Appear normal in size and texture. No focal lesion seen.
- **ASCITES:** No evidence seen.
- **URINARY BLADDER:** Normal

IMPRESSION: Right Mid Ureteric Calculus with Resultant Mild to Moderate Hydroureteronephrosis.

Not valid for Medico Legal Purposes

Hafiz Rafiq Market Opposite Women & Children Hospital Karak

0341-9768971
0330-6881520

Consultant Urologist

Dr. Farid Ullah Shah



Not for Medical Purpose

کنسلٹنٹ یورالوجسٹ

ڈاکٹر فرید اللہ شاہ

M.B.B. S (Pesh)

M.C.P.S- (Surgery)

F.C.P.S (Urology)

ایم، بی، بی، ایس (پشاور) ایم، سی، پی، ایس (سرجری)

ایف، سی، پی، ایس - یورالوجی اینڈ کنڈری ٹرانسپلانٹ

ماہر امراض: گرد، مثانہ، پراسٹیٹ، رومی، پیجری، مردانہ کمزوری، بے اولادی

P. Name:

FUP

Age

279

Gender

M.

Date

26/7/24

Clinical Record

Rx

P. O. L.

Tab: Axolev 500mg
1+1

110

Tab Nimepan 100mg
1+1

110

K. W. B.

B. L. I.

V. I. S.

120

Tab. CALCIVAN
1 روزانہ کھانے کے بعد

660

2752

2752

29 JUL 20 09:58

ID 0006
MODE (OFF)
SAMPLE TYPE : Blood
WBC 10.5H 10.1/dl
RBC 4.20 10⁶/dl
HGB 16.1 g/dl
HCT 48.7 %
MCV 98.7 fL
MCH 29.7 pg
MCHC 33.1 g/dl
PLT 252 10³/dl

LY 2.3 [31.2 %]
MO 0.3 [3.9 %]
GR 8.8 [64.8 %]

PDW 11.1 %
RDW 12.5 %
PCT 0.26 %
MPV 7.6 fL
PD% 17.6 %

Flags
Leukocytosis



AZAM
HAMM
COMPUTERIZED

MEDICAL LABORATORY
MEDICAL LABORATORY

Opp: K.G.N Hospital Bannu Town Ship. Mob: 0331-9175484

بانتال ٹاؤن شپ ہسپتال کے سامنے
Not Valid for Court

اعظم میڈیکل لیبارٹری

P.Name;;M Sajad

Age Gender .M

Specimen Blood.

Ref:BY:Dr.Haris Hamid Sb

Test Req CBC

Date 29/07/2020

BLOOD COMPLETE EXAMINED

<u>TEST.</u>	<u>NORMAL.</u>	<u>UNITS.</u>	<u>RESULTS.</u>
Total Leukocytes Count.	4000—11000	/cmm.	10.500
RBC	M; 4.5 – 6 F; 4.5 – 5.5	Mil/cu-mm	5.49
Hemoglobin.	Women 12.3 – 15.3 Men 14.0 – 17.5 Newborn 15.2 – 23.5 Children 11.1 – 14.3	Gms/dl.	16.1
PCV	M; 40 – 54 F; 37 – 47	Vol%	48.7
MCV	76 – 96	FL/CAP	88.7
MCH	32 – 36	pg	29.3
MCHC	31 – 35	g/dl.	33.1
Platelet Count	150000 – 450000 ,		2'68,000
Differential; Count;			
Neutrophils.	AD 40 - 75 CH 20 - 40	%	65
Lymphocytes.	AD 20 - 40 CH 40 - 75	%	30
Monocytes.	02 - 10	%	03
Eosinophils.	01 - 03	%	02

Signature.

CBC By Hematology Analyser , **TFTs**, Electrolytes,HbA1c, Urine & Pus C/Sensitivity, CRP, Anti ANA, EIT
APTT, G6PD,TPHA, HIV HBs HCV Screening, & **ELISA** Method. H. Pylori antibodies, Typhidot, PSA, Hpled Profile
O.G.T.T.LFTs. RFT Test facilities are available

(37)

INSTITUTE OF KIDNEY DISEASES HAYTABAD PESHAWAR

Sector 1 Phase IV Haytabad Peshawar Phone: 091-9217261. Ext 257



Department of Pathology

MR No : **3465140720-1**
Patient Name : M Sajid (Male : 27 Years)
Ref By. : UROLOGY

Lab ID : 53780720-300720
Operator : SANA ULLAH
Entered : 30-JUL-20
Printed : 30-JUL-20 12:00 AM

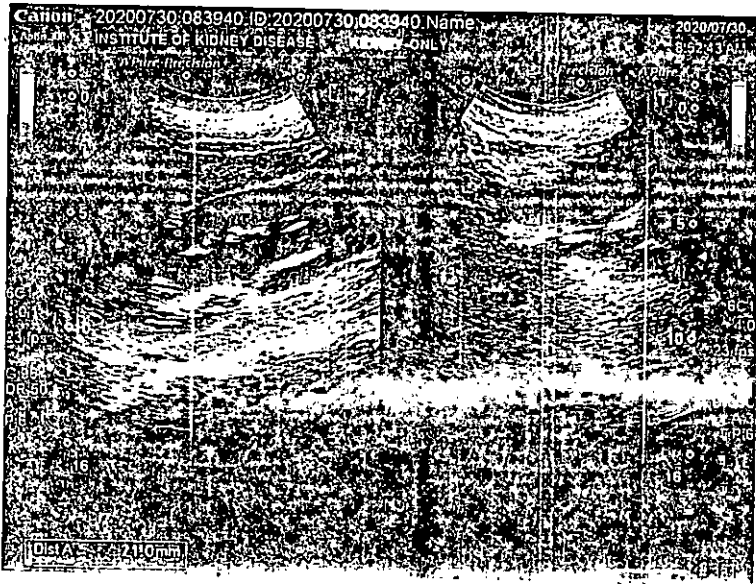
Urine ROUTINE Examination

<u>Physical</u>		<u>Chemical</u>		<u>Microscopic</u>	
Quantity	mi	Albumin	+	Red Cells	NUMEROUS /HPF
Color		Sugar	NIL	Pus Cells	NUMEROUS /HPF
pH	6.0	Ketone Bodies		Epith Cells	/HPF
Sp.Gravity		Billurbin		Casts	
Blood		Urobilinogen		Granular	/HPF
Nitrite		Leukocytes		Hyaline	/HPF

Dr. Malik Zeb Khan

Professor & HOD Pathology

Notes : Electronically verified report, signatures not required. Identity of the patient not verified. Any query about this report may be addressed with in twenty four hours of reporting, the duration for which the samples are preserved.



(38)

ULTRASOUND REPORT

GENITO- URINARY SYSTEM

Kidneys

Right kidney shows mild hydronephroureteric changes and VUJ multiple fragmented calculi 21mm length.

Both kidneys are normal in sizes, echogenicity & normal cortical thickness with well-differentiated corticomedullary junction.

No evidence of mass.

Urinary bladder

is adequately filled and shows normal wall thickness with out any focal lesion. No calculus seen.

HEPATO-BILIARY SYSTEM

Liver, gallbladder, spleen and pancreas are normal sonomorphologically.

GENERAL ABDOMEN

No ascites, pleural effusion & lymphadenopathy noted. Major vessels are normal. No definite gut pathology noted. Normal diaphragmatic excursion.

Impression:

- Right VUJ calculi hydronephroureteric changes.


Dr. Nazeem Ullah

9:06:42 AM

(39)

NAME	Mr. MOHD SAJID	Sex:	M
DATE	30-07-2020-	Age:	27 YRS

CONSULTANT DR.

Both kidneys are normal in size, shape and position.
Parenchymal echogenicity is normal. CMD is intact.
The right kidney shows mod HDN & HDU secondary to 10.3 mm stone at UVJ®. **No evidence of supra-renal mass/renal cyst is seen.**
Urinary bladder has normal wall thickness.
Doppler UVJ,s: Right UVJ shows twinkling artifact (obstruction) where as the left UVJ shows normal colour flow urinary jets (patent ureter).

IMPRESSION: Right UVJ Stone(10.3)mm.

Dr. Nail Muhammad
MD, MJC, DMRD.
Radiologist / Ultrasound Specialist

(39)

NAME	Mr. MOHD SAJID	Sex:	M
DATE	30-07-2020-	Age:	27 YRS

CONSULTANT DR.

Both kidneys are normal in size, shape and position.
 Parenchymal echogenicity is normal. CMD is intact.
 The right kidney shows mod HDN & HDU secondary to 10.3 mm stone at UVJ®. **No evidence of supra-renal mass/renal cyst is seen.**
 Urinary bladder has normal wall thickness.
 Doppler UVJ,s: Right UVJ shows twinkling artifact (obstruction) where as the left UVJ shows normal colour flow urinary jets (patent ureter).

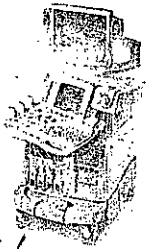
IMPRESSION: Right UVJ Stone(10.3)mm.

Dr. Naik Muhammad
 MD, MUSE, DMRD.
 Radiologist / Ultrasound Specialist

Dr. Muhammad Ayaz Khattak

M.B.B.S., BA(UW)

Physician & Ultrasound Specialist



P. Name M. Sajid Age _____ Sex ♂ Date 28/07/20

Clinical Record

RX

US Abdomen

Rt. Kidney is mild to moderately H Nephrotic - proximal H ureter

An echogenic focus of 5.3 mm is noted in the lower part of ureter - suggestive of a calculus.

Lt. Kidney & bladder are normal looking.

Rest OK

(1) Cap. Solosia SK

$\frac{1}{2} \times 0.4 = 0.2$

(2) Orisa - RTS
 $1 + 1$

(3) Tas X-ph
 $1 + 1$

(4) Tas - Lupa 250
 $15 = 15 = 15$

(5) DTS - 1000 cc
- 1 kg Acalact
- 1 kg Glutinyk
- 1 kg Lalia
 $15 = 15 = 15$

(6) Allectra sup

$15 = 15 = 15$

(7) Naphkid
 $15 = 15 = 15$

gung kemathar
1000 cc

Diagnosis
Peshawar.

Patient Name: Muhammad Saad

Age: 27Y

Dated: 8th

July-2020

(41)

ULTRASOUND REPORT

GENITO- URINARY SYSTEM

Kidneys

Right kidney shows 12mm calculus with no obstruction.

Both kidneys are normal in sizes, echogenicity & normal cortical thickness with well-differentiated corticomedullary junction.

No evidence of mass or hydronephrosis.

Urinary bladder

is inadequately filled and shows normal wall thickness with out any focal lesion. No calculus seen.

HEPATO-BILIARY SYSTEM

Liver, gallbladder, spleen and pancreas are normal sonomorphologically.

GENERAL ABDOMEN

No ascites, pleural effusion & lymphadenopathy noted. Major vessels are normal. No definite gut pathology noted. Normal diaphragmatic excursion.

Impression:

- Right renal calculus.

Dr. Samina

EPI/MD (42) 6/5
Grinder

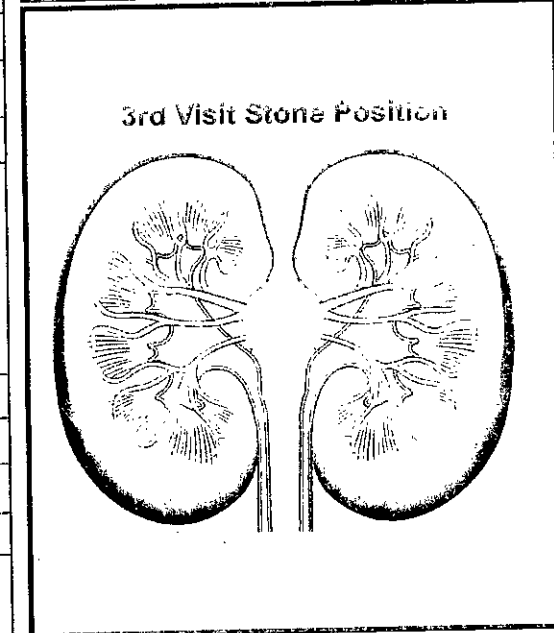
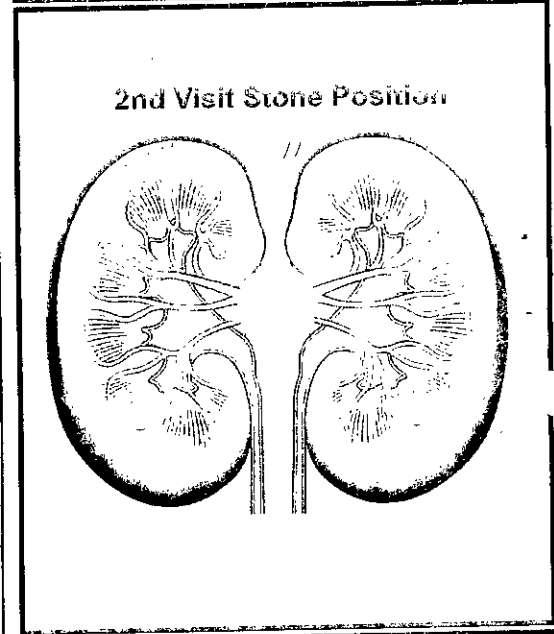
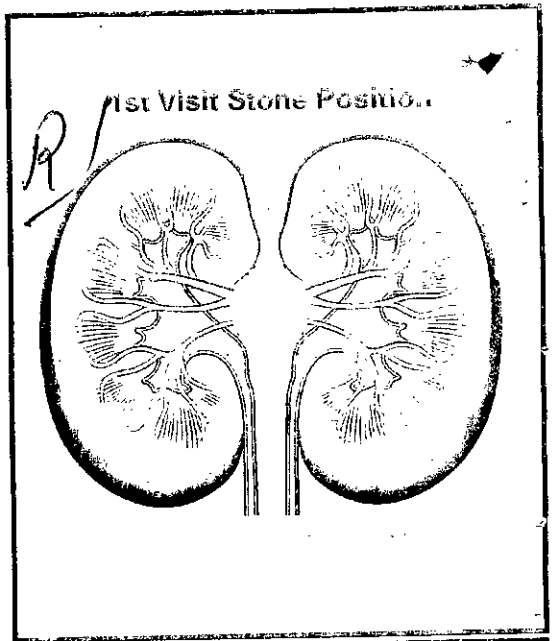
Institute of Kidney Diseases, Hayatabad
Peshawar

Lithotripsy Section

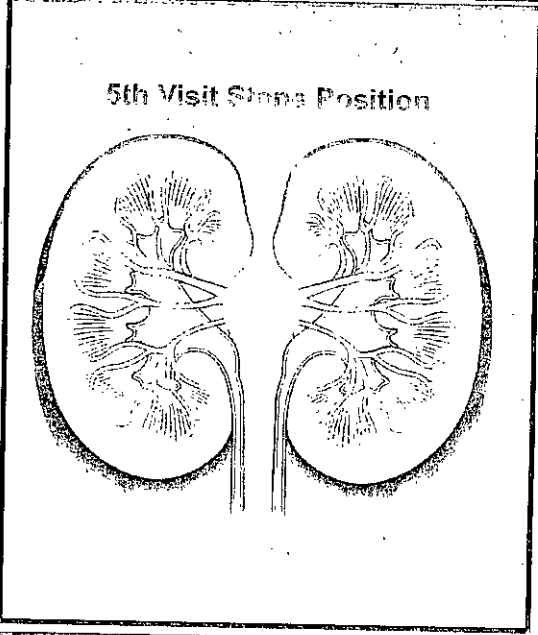
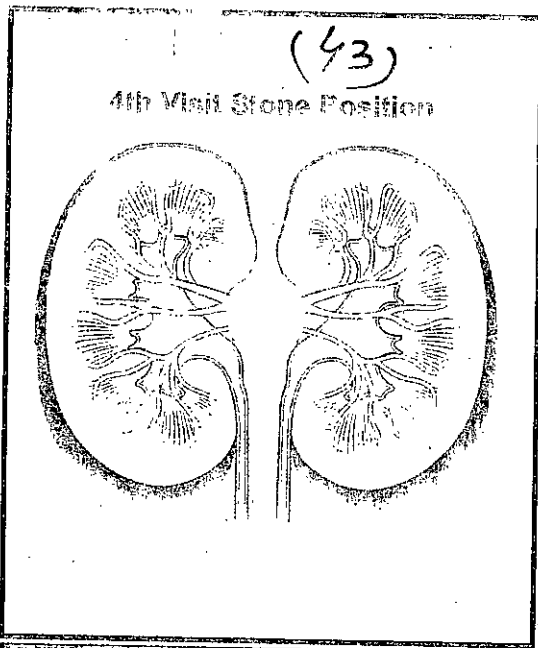
Patient Information:

Patient Hospital No 3445090720-1 Registration Date 23/7/20
Department Urology Nationality Pak
Patient Name Mohammed Sajid
Age _____ Gender M
CNIC No/Passport No _____
Address Peshawar
Contact No 991-9217203
E-mail address _____

1st Session	
No of Shocks:	5000
Duration:	10 min
Complication	Rt Renal Stone
Treatment	
Next Visit Date	11/8/20
2nd Session	
No of Shocks:	
Duration:	
Complication	
Treatment	
Next Visit Date	
3rd Session	
No of Shocks:	
Duration:	
Complication	
Treatment	
Next Visit Date	



4th Session	
No of Shocks:	
Duration:	
Complication	
Treatment	
Next Visit Date	
5th Session	
No of Shocks:	
Duration:	
Complication	
Treatment	
Next Visit Date	



Remarks

ہدایات:

- ۱۔ پیشاب میں خون آئے تو پریشان نہ ہوں۔ پانی اور پینے والی چیزوں کا استعمال زیادہ سے زیادہ کریں۔
- ۲۔ بخار اور مسلسل الٹیاں آئیں تو ہسپتال تشریف لائیں۔
- ۳۔ ہسپتال آتے وقت کارڈ لازماً ساتھ لائے۔

شکریہ۔

(44)

Annexure C

OFFICE OF THE
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
No: 566 P/O Dt: 17/07/21

OFFICE ORDER

WHEREAS, the accused Warden (IPS-07) Sajid S/O Spin Badshah attached to Central Prison Peshawar was charge-sheeted within the meaning of Rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of Insubordination contained in Statement of Allegations/ Disciplinary Action served upon him with this Headquarters endorsement No. 3890-93 dated 05-12-2020 upon report of the Superintendent Central Prison Peshawar vide No. 13368/WE dated 20-10-2020. In this regard Mr. Jawad Gill, Assistant Superintendent Jail, Central Prison Peshawar was appointed as Inquiry Officer.

AND WHEREAS, the accused Warden contacted by the Inquiry Officer to submit a written reply against the Charge Sheet and appear before the inquiry officer for personal hearing but fails to do so.

AND WHEREAS, the above accused Warden was served with final show cause notice at his home address through register post vide this HQs. memo No. 38 dated 05-01-2021 but reply of the same was also not submitted by the accused Warden.

AND WHEREAS, absence notice in respect of the accused Warden was also published in two daily newspapers i.e. Mashriq dated 31-01-2021 and Express dated 01-02-2021 with the direction to report to the Superintendent Headquarters Prison Peshawar and explained his position within 15 days of the publication of notice but fails to do so.

NOW THEREFORE, in exercise of powers conferred under Rule- 9 & 14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 having considered the charges leveled against him in light of available record and as per recommendation of the Inquiry Officer, the undersigned being Competent Authority is pleased to initiate ex-parte action against the accused Warden and award him major penalty of Removal From Service.

Muhammad
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

Endorsement No: 567-681

Copy of the above is forwarded to the:-

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Superintendent Central Prison Peshawar with reference to his report quoted above. Proper entry to this effect may be made in his service book under proper attestation.
4. Mr. Jawad Gill, Assistant Superintendent Jail, Central Prison Peshawar (Inquiry Officer).
5. Pay Branch (Head Clerk) Central Prison Peshawar.
6. Official concerned.

Muhammad
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

BETTER COPY

OFFICE OF THE
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
No.566 P/B Dt: 17/02/2021

OFFICE ORDER

WHEREAS, the accused Warder (BPS-07) Sajid Son of Spin Badshah attached to central prison Peshawar was charge sheeted within the meaning of Ruled of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of his misconduct contained in statement of Allegations/Disciplinary Action served upon him vide this Headquarters endorsement No. 3890-93 dated 09.12.2020 upon report of the Superintendent Central Prison Peshawar vide No.13368/WE dated 30.10.2020. Wherein Mr. Jawad Gill, Assistant Superintendent Jail, Central Prison Peshawar was appointed as Inquiry Officer.

And whereas, the accused Warder contacted by the Inquiry Officer to submit his written reply against the Charge Sheet and appear before the inquiry officer for personal hearing but fail to do so.

AND WHEREAS, the above accused Warder was served with final show cause notice at his home address through register post vide this HQs. Memo No.38 dated 05.01.2021 but reply of the same was also not submitted by the accused Warder.

AND WHEREAS, absence notice in respect of the accused Warder was also published in two daily newspapers i.e. Mashriq dated 31.01.2021 and Express dated 01.02.2021 with the direction to report to the Superintendent Headquarters Prison Peshawar and explained his position with 15 days of the publication of notice but falls to do so.

NOW THEREFORE, in exercise of powers conferred under Rule-9 & 14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 having considered the charges leveled against him in light of available record and as per recommendations of the Inquiry Officer, the undersigned being Competent Authority is pleased to initiate exparte action against the accused Warder and award him major penalty of Removal From Service.

Sd/-
SUPERINTENDENT
Headquarters Prison Peshawar

Endorsement No.567-68/-

Copy to the above is forwarded to the:-

1. Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar
2. Accountant General, Khyber Pakhtunkhwa Peshawar
3. Superintendent Central Prison, Peshawar with reference to his report quoted above, proper entry to this effect may be made in his service book under proper attestation.
4. Mr. Jawad Gill, Assistant Superintendent Jail, Central, Prison Peshawar, (inquiry Officer).
5. Pay Branch (Head Clerk) Central Prison Peshawar
6. Official Concerned

Sd/-
SUPERINTENDENT
Headquarters Prison Peshawar

975
22-2-21

صہیل خان صاحب

سہیل جی

(45)

Annexure D

~~بخدمت جناب~~

جناب عالی!

مودبانہ گزارش کی جاتی ہے کہ میں 25-07-2020 کو تین دن میڈیکل پر گیا تھا گردے میں پتھر تھی اس وجہ سے بہت زیادہ تکلیف تھا اس وجہ سے 30-07-2020 کو (PCNL) آپریشن کیا جس کی وجہ سے ڈاکٹر نے دس دن کا آرام کا مشورہ دیا اور اس دن گزرنے کے بعد میری بیماری اور بھڑتی گئی اور میرے مٹانے اور گردے میں زخم پیدا ہو گئے اور میرے لئے کھڑا ہونا مشکل ہو گیا جسکی وجہ سے میں ڈیوٹی سرانجام نہیں دے سکتا تھا۔ چونکہ گردے اور صحت کا مسئلہ تھا اس وجہ سے اپنی ڈیوٹی سے غیر حاضر رہا اسی دوران مختلف ڈاکٹروں سے علاج جاری رہا اور ڈاکٹروں کے مطابق کہ آپ ہر 25 دن بعد الٹراساؤنڈ کرے گے اور رپورٹ دیکھائے گے۔ اور وہ رپورٹ آپ کے سامنے ہیں۔ لہذا آپ صاحبان مہربانی فرما کر مجھ کو ڈیوٹی پے لو اور میں آئندہ ایسا کبھی نہیں کرونگا اور میں زندگی بھر آپ صاحبان کا احسان مند رہوں گا۔

شکریہ

عین نوازش ہوگی

آپ کا تابعدار وارڈر محمد ساجد ولد سہیل بادشاہ

تاریخ 15-02-2021

صہیل خان صاحب
22/2/21

(46)

Annexure E

To,

The Inspector General Prison,
Khyber Pakhtunkhwa,
Peshawar

Subject: REMINDER FOR DECISION ON
DEPARTMENTAL APPEAL DATED 22/02/2021

Respected Sir,

The applicant / appellant submits as under: -

- 1) That the applicant preferred a departmental appeal on 22/02/2021 against the decision of his removal from service.
- 2) That till date the applicant has not been communicated about the fate of his appeal.

It is, therefore, humbly requested that the applicant / appellant may kindly be communicated about the fate of his departmental appeal dated 22/02/2021.

Dated 18/05/2021

Yours obediently

M-SAJID

Warder Muhammad Sajid
S/o Spin Badshah
R/o Village Asoot Kala,
PO Ahmad Abad Tehsil Takhti
Nasrati District Karak

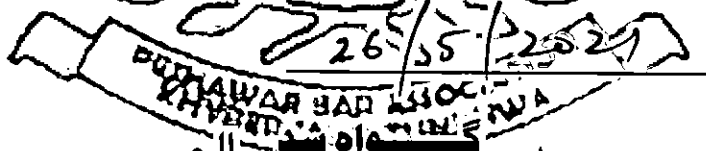
قیمت 50 روپے	84354			
ایڈوکیٹ: مسٹر		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: ۱۰-۷۳۵۶-۲۰۰۷				
رابطہ نمبر: ۲۹۸۱۷۸۱-۲۰۰۷				

بعد ازاں جناب: خیبر پختونخواہ سروس ٹراکٹیوئل پشاور

منجانب: ایڈووکیٹ	دعویٰ: سروس ایڈیل
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آگہ

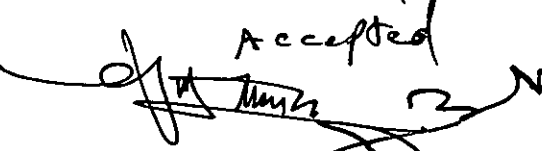
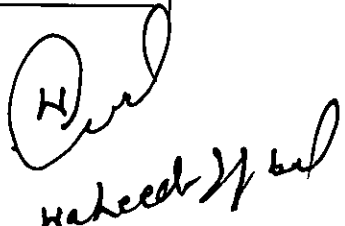
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام مسٹر عبدالرحمن صاحب و مسٹر اجمل احمد کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرہے نہ وقررت ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لے جاسکتے ہیں لہذا یہ فیصلہ اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا مستحقہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 26/05/2024


مقام پشاور کے لیے منظور ہے۔

Attested & Accepted

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

محمد سعید

P1055-11

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. **DB**

No.

Appeal No. 5726 of 20 21

Muhammad Sajid Appellant/Petitioner

Versus

Govt. of KPK through Chief Secy. Respondent

Respondent No. 4

Notice to: -

Inspector General of Prison KPK Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 26/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 17th

Day of Sep 20 21

(for Reply)

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, D.B
PESHAWAR.

No.

Appeal No. S7 26 of 20 21

Muhammad Sajid Appellant/Petitioner

Versus

Court of KPK through Chief Secy Respondent

Respondent No. 5

Notice to:

Assistant Director Inspectorate General of
KPK Prisons Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal 26/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 17/11
8/11 20 21

(for Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, **D.B**
PESHAWAR.

No.

Appeal No. **5724** of 20 **21**

Muhammad Sajid Appellant/Petitioner

Versus

Court of Kpk through chief Secy Respondent

Respondent No. **1**

Notice to: —

Court of Kpk through chief Secretary Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on **26/11/2021** at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this **17/11**

Day of **SEP** 20 **21**

(for Reply) [Signature]

[Signature]
Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, DB
PESHAWAR.

No.

Appeal No. S724 of 20 21

Muhammad Sajid Appellant/Petitioner

Govt. of KPK through Chief Secy Respondent

Respondent No. 2

Notice to: Secretary Home KPK Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 26/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 17th

Day of Sep 20 21

(for Reply)
12:00



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

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

Service Appeal No. 5724 of 2021


Muhammad Sajid (Ex-warder).....Appellant

VERSUS

Government of Khyber Pakhtunkhwa and Others.....Respondents

INDEX

S.NO.	DESCRIPTION OF DOCUMENTS	Annex	Page No.
1.	Joint Para-wise Comments	-	1-3
2.	Affidavit	-	4
3.	Show cause Notice No. 1 dated 22.04.2020	A	5
4.	Show cause Notice No. 2 dated 03.06.2020	B	6
5.	Absence Notice dated 21.10.2020	C	7
6.	Relevant Rules 1082, 1083 of Khyber Pakhtunkhwa Prisons Rules 2018	D	8-9
7.	Charge Sheet	E	10
8.	Inquiry Report	F	11
9.	Publication in two daily NEWS Papers dated 01.02.2021 & 31.01.2021	G	12-13
10.	Superintendent Jail Order pertaining to his Removal from Service dated 17.02.2021	H	14
11.	Departmental Appeal	I	15
12.	IG Prisons Office Order dated 17.03.2021 passed in Departmental Appeal	J	16


Deponent

In Service Appeal No. 5724/2021

Muhammad Sajid, Ex-Warder, Central Prison Peshawar,
r/o Village Asot Kala, P/O Ahmed Abad Tehsil & District
Takhti Nasrati District Karak**Appellant**

VERSUS

- 1- Govt of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat
Peshawar.
- 2- Secretary Home Khyber Pakhtunkhwa Peshawar.
- 3- Superintendent Headquarter Prison Peshawar.
- 4- Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar
- 5- Assistant Director Inspector General of Khyber Pakhtunkhwa Prison
Peshawar,**Respondents.**

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO 1 to 5

Preliminary Objections

- i. That the appellant has got no cause of action.
- ii. That the present appeal 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 got no locus standi.
- v. That the present appeal is bad for mis joinder and non-joinder of necessary parties.
- vi. That the appeal of the appellant is badly time barred.

FACTUAL OBJECTION:-

1. Admitted to extent that he was appointed as warder in Khyber Pakhtunkhwa prison Department and during period of his probation he never took his job in serious manner. The appellant creates hurdles for the administration and to squalid the environment for the other staff.
2. Not admitted, his claim is unacceptable that his performance was up to the mark and entire satisfaction of his high-ups as his conduct towards his duties was very poor from the very beginning and proved himself undesirable official during probation period. While the appellant posted to Central Prison Peshawar willfully absented

himself from official duty the competent authority served him with show cause notice dated 22-04-2020 for his 14 days of willful absence. **(Annex-A)** another show cause notice was issued dated 03-06-2020 for 03 days of willful absence. **(Annex-B)** and again the appellant absented himself and still at large which constitute gross misconduct absence notice also served to his home address on 21-10-2020. **(Annex-C)**

3. Incorrect not admitted. The rule-1082 & 1083 of Khyber Pakhtunkhwa Prison Rules 2018, provided mechanism where a person has been unable to perform duty un avoidable reason he shall report the matter to Superintendent Jail wherein in such case the appellant does not fulfill the criteria as laid down in 1083 of Khyber Pakhtunkhwa Prison Rules 2018. **(Annex-D)**
4. Incorrect not admitted. The appellant was contacted telephonically to resume his duty but he failed to do so, keeping this attitude the appellant was charge sheeted and proper inquiry was conducted against him. **(Annex-E)** The appellant was also contacted by the inquiry officer in order to afford him an opportunity to proof himself innocent but appellant neither submitted his written reply nor appeared before the inquiry officer for personal hearing. As per recommendation of I.O **(Annex-F)** an absence notice was published in two daily newspaper i.e Express dated 01-02-2021 & Mashriq dated 31-01-2021 **(Annex-G)** with the direction to appear before the Competent authority otherwise ex-parte action will be initiated against the appellant but again he neither submitted reply nor appeared for personal hearing in such like situation a willful absence of warder /appellant is undesirable . The competent authority rightly awarded the said penalty. *Copy of removal order* **(Annex-H)**
5. Incorrect not admitted. The appellant preferred departmental appeal to I.G Prisons being respondent No. 04 which was rejected on the basis of allegation as leveled against the appellant was proved. *Copy of rejection order.* **(Annex-I)**
6. Incorrect misleading, the appellant preferred departmental appeal on 22-02-2021 and without any delay the appellate authority i.e Respondent No. 04, examined and his appeal was rejected being without any substance, by the appellate authority (i.e *Respondent No.4*) on 17-03-2021. A copy of the same was also sent to his home address.
7. Incorrect.

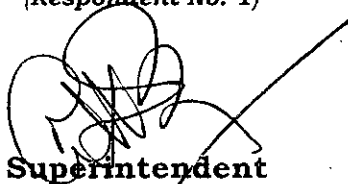
OBJECTION ON GROUNDS:

- A. Not admitted. Order dated 17-02-2020 issued by the respondents is totally in accordance with law, rules in light of facts.
- B. Not admitted. as elaborated in para 04.
- C. Not admitted. The appellant was served with direct show cause notice as the charges were already proved against him. Therefore his plea carries no weight.
- D. Not admitted. elaborated as para 04.
- E. Not admitted. The appellant was afforded ample opportunities to prove himself innocent, but failed and proved himself guilty of gross misconduct, which brought the current situation to him.
- F. Not Admitted. elaborated in para 03.
- G. Incorrect and not admitted. The appellant deliberately absented himself from official duty and violated of rules 1082& 1083 Khyber Pakhtunkhwa Prison Rules 2018.
- H. Incorrect, misleading irresponsible and poor attitude of the appellant towards his duties during probationary period of service. Therefore the blame of the appellant may be dismissed having being concocted and culpability.
- I. That the respondent also seek permission to raise further points at the time of arguments.

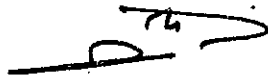
Prayer:

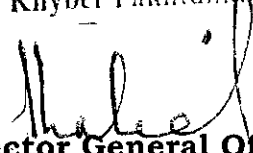
In the light of above, it is humbly prayed that the above appeal may be dismissed with cost.

Chief Secretary
Govt of Khyber Pakhtunkhwa Civil
Secretariat Peshawar
(Respondent No. 1)

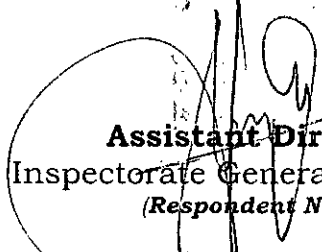


Superintendent
Headquarters Prison Peshawar
(Respondent No. 3)


Secretary Home
Khyber Pakhtunkhwa Peshawar
(Respondent No. 2)
Home Secretary,
Khyber Pakhtunkhwa


Inspector General Of Prison
Khyber Pakhtunkhwa Peshawar
(Respondent No. 4)

23/11/21


Assistant Director
Inspectorate General of Prisons
(Respondent No. 5)

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

In the matter of
Service Appeal No. 5724/ 2021
Muhammad Sajjid S/o Spin Badshah Ex Warder,
attached to Central Prison Peshawar----- Appellant

VERSUS

- 1- Govt; of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar.
- 2- Secretary Home Khyber Pakhtunkhwa Peshawar.
- 3- Superintendent Headquarter Prison Peshawar.
- 4- Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar
- 5- Assistant Director Inspector General of Khyber Pakhtunkhwa Prison Peshawar.....**Respondents**

COUNTER AFFIDAVIT ON BEHALF OF THE RESPONDENTS

No. 1 & 5.

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

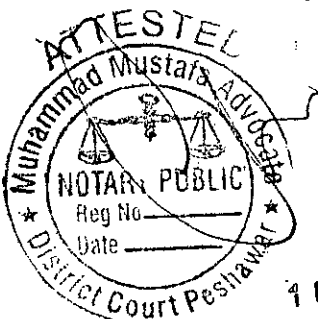
Chief Secretary
Govt of Khyber Pakhtunkhwa Civil
Secretariat Peshawar
(Respondent No. 1)

Secretary Home
Khyber Pakhtunkhwa Peshawar
(Respondent No. 2),
Khyber Pakhtunkhwa

Superintendent
Headquarters Prison Peshawar
(Respondent No. 3)

Inspector General Of Prison
Khyber Pakhtunkhwa Peshawar
(Respondent No. 4)

Assistant Director
Inspectorate General of Prisons
(Respondent No. 5)



16 JUN 2022

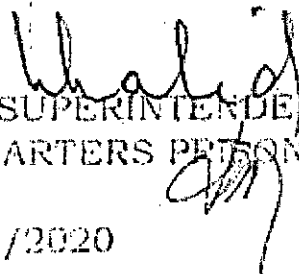
CAUSE NOTICE UNDER RULE-5(1) READ WITH RULE-7 OF THE
PAKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY &
DISCIPLINE) RULES, 2011.

You, **Warder (BPS-07) Muhammad Sajid S/o Speen Badshah** attached to Central Prison Peshawar willfully absented yourself from your allotted duties as well jail premises without prior permission of the Competent Authority w.e.f 28-03-2020 and resumed on 12-04-2020 after 14 days willful absence, which constitutes gross misconduct.

I, **Khalid Abbas**, Superintendent Headquarters Prison Peshawar as Competent Authority, am satisfied by the report received through the Superintendent Central Prison Peshawar vide report No. 5355/LO dated 14-04-2020 and there is no need of holding any further inquiry.

Now therefore, you above named **Warder (BPS-07)** are hereby called to show cause within 07 days of the receipt of this notice as to why you should not be dismissed from service for above stated act of misconduct.

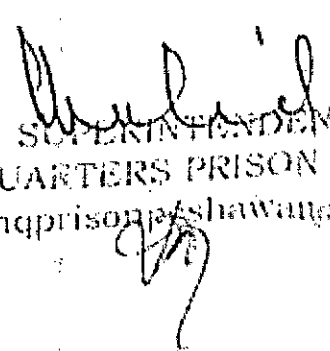
In case of reply does not reach this office within stipulated period, ex-parte action shall be taken against you.


SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

Endorsement No: 1315-16 /- dated: 22/04/2020

Copy of the above is forwarded to the: -

- 1- Superintendent Central Prison Peshawar with reference to his report quoted above. A copy of the same duly signed and dated by the accused Warder may be returned back to this Headquarters and token or receipt and for this record.
- 2- **Warder Muhammad Sajid S/o Speen Badshah** C/o Superintendent Central Prison Peshawar.


SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
E-mail: hqprisonpeshawar@gmail.com

نہ ملے گا
محمد ساجد
22/04/2020

You, the following Warders (BPS-07) attached to Central Prison Peshawar have were granted leave and were required to resume on due dates as per below detail but failed, hence committed gross misconduct:-

S#	Name of Warder	Date of granting leave	Due date of arrival	Remarks
1	Warder Khalid Mehnood <i>Handwritten: Khalid Mehnood 5-6-20</i>	05 days on 14-05-2020	20-05-2020	Resumed on 03-06-2020 after 10 days absence.
2	Warder Abdul Samad <i>Handwritten: 5-6-20</i>	03 days on 09-05-2020	12-05-2020	Resumed on 30-05-2020 after 15 days absence.
3	Warder Sajid S/o Speen Bacha <i>Handwritten: SAJID 4-5-20</i>	03 days on 19-05-2020	23-05-2020	Resumed on 30-05-2020 after 07 days absence.

I, Khalid Abbas, Superintendent, Headquarters Prison Peshawar as

Competent Authority; am satisfied by the report received through the Superintendent Central Prison Peshawar vide his report No. 6707/WE, 6708/WE & 6709 dated 03-06-2020 and there is no need of holding any further inquiry.

Now therefore, you the above accused Warders (BPS-07) are hereby called to show cause within 07 days of the receipt of this notice as to why you should not be dismissed from service for above stated act of misconduct.

In case, your reply does not reach this Headquarters within stipulated period, ex-parte action shall be taken against you.

Handwritten Signature
 SUPERINTENDENT
 HEADQUARTERS PRISON PESHAWAR

Endorsement No: *1680-92* / - dated: *03* / 06 / 2020

Copy of the above is forwarded to the:-

- 1- Superintendent Central Prison Peshawar with reference to his report quoted above. A copy of the same duly signed & dated by the above accused may returned back to this HQs. as a token of receipt and for the record.
 - 2- Warder Khalid Mehnood
 - 3- Warder Abdul Samad
 - 4- Warder Sajid S/o Speen Bacha
- } C/o Superintendent Central Prison Peshawar.

Handwritten signature/initials

Handwritten Signature
 SUPERINTENDENT
 HEADQUARTERS PRISON PESHAWAR
 E-mail: hqprisonpeshawar@sil.gov.pk

از دفتر سپرنٹنڈنٹ

ہیڈ کوارٹرز جیل پشاور

نمبر: 13368 مورخہ: 10/10/2020

نوٹس بنام: ساجد ولد حسین بادشاہ (جیل وارڈر)

پتہ: گاؤں ایسٹ کلاہ ڈاکھانہ احمد آباد تحصیل تخت نسرئی ضلع کرک

عنوان: نوٹس برائے حاضری

آپ کو بذریعہ نوٹس ہذا مطلع کیا جاتا ہے کہ آپ کو مورخہ 24-07-2020 کو 03 یوم میڈیکل چیمبر دی گئی تھی اور دوبارہ حاضری مورخہ 29-07-2020 کو ہوتی تھی۔ مگر آپ مذکورہ تاریخ کو ذیوبنی پر حاضر ہونے میں ناکام رہے اور حال اپنی ذیوبنی اور لاکڑ سے مسلسل غیر حاضر ہیں اور آپ کے بارے میں کوئی معلوم بھی نہیں۔

اس لئے آپ کو مطلع کیا جاتا ہے کہ مذکورہ نوٹس کے ملنے کے 03 دن کے اندر اندر مذکورہ چیمبر کے سامنے حاضر ہو کر اپنی طویل غیر حاضری کی وجوہات بیان کریں۔ بصورت دیگر آپ کے خلاف یکطرفہ کارروائی فیمل میں لائی جائیگی جو کہ نوٹس سے پہلے ہی ہو چکی ہے۔

سپرٹنڈنٹ
ہیڈ کوارٹرز جیل پشاور

تذکرہ نمبر: 13368 مورخہ: 10/10/2020

کاپی برائے اطلاع و ضروری کارروائی

1- سپرنٹنڈنٹ سنٹرل جیل پشاور بحوالہ نامی نمبر 13368 مورخہ 20-10-2020

2- ہیڈ کوارٹر (پے رانچ) سنٹرل جیل پشاور اور پرن بلاوار ذریعہ ذیوبنی انور بند کی جاوے۔

سپرٹنڈنٹ
ہیڈ کوارٹرز جیل پشاور

1080. Prohibition against business and pecuniary transactions.---(1) No prison officer shall directly or indirectly engage in any trade, business or employment other than his legitimate duties.

(2) No prison officer shall lend money to, borrow money from, enter into any pecuniary transaction with, or incur any obligation in favor of any other officer or any prisoner.

1081. Residential quarters.---(1) Rent free residential quarters shall ordinarily be provided at each prison for the Superintendent, Deputy Superintendent, Senior Assistant Superintendent, Assistant Superintendents, Senior Medical Officer, Medical Officer, Pharmacy Technician, Assistants and Clerical Staff, Storekeepers, Instructors, Teachers, Head Warders and the Warders.

(2) Every prison official for whom the residential quarters are not available in prison shall reside within such distance from the prison as the Superintendent may direct,

1082. Leave to Subordinate Officers.---(1) No subordinate officer shall, at any time, without the permission of the Deputy Superintendent, if such officer is subordinate to him, and, in any other case, of the Superintendent, be absent from the prison premises, whether by day or night.

(2) The Deputy Superintendent shall not, without the sanction of the Superintendent, grant leave of absence to any subordinate officer, or permit any such officer to remain absent, for any period exceeding four hours at any one time.

(3) Whenever any leave is granted by the Deputy Superintendent to any subordinate officer he shall, at the time the leave is granted, record the fact, and the period of leave in his report book.

(4) Every subordinate officer shall immediately on return from leave report the fact to the Deputy Superintendent, who shall forthwith record his arrival in his report book.

(5) The Deputy Superintendent shall similarly record in his report book, all leave granted by the Superintendent and all reports made of return from leave.

(6) Fifteen (15) days recreation leave shall be granted to every employee of Department once in a calendar year on rotation basis.

1083. Absence caused by illness or other unavoidable cause.--- Whenever any subordinate officer is at any time prevented by sudden illness or other unavoidable cause, from attending the prison or performing his duties he shall forthwith give notice to the Superintendent along with his reasons for absence. The Superintendent shall then make suitable arrangements for the due performance of his duties.

DISCIPLINARY ACTION

I, Khalid Abbas, Superintendent Headquarters Prison Peshawar as Competent Authority am of the opinion that Warder [BPS-05] Sajid S/O Spin Badshah attached to Central Prison Peshawar has rendered himself liable to be proceeded against, as he committed the following act/ omission within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011: -

STATEMENT OF ALLEGATIONS:

- i. You have willfully absented yourself from your allotted duty as well as jail premises w.e.f 28-03-2020 and resume on 12-04-2020 after 14 days of willful absence. Show cause notice was served upon you vide this Headquarters Prison No. 1315-16 dated 22-04-2020 but reply of the same is awaited.
- ii. You have been granted 03-days leave w.e.f 19-05-2020 and after expiry of said leave you were remained absented from duty as well as Jail premises w.e.f 23-05-2020 and resume duty on 30-05-2020 after 07 days of absence. Show Cause notice was again served upon you vide this Headquarters Prison No. 1690-93 dated 03-06-2020 but reply of the same is awaited.
- iii. You have been granted 03 days of medical rest w.e.f 24-07-2020 and after expiry of said medical rest you remained absented from duty as well as from Jail premises w.e.f 29-07-2020 and still at large, which constitutes gross misconduct on your part. Final Show Cause Notice was served upon you at your home address vide this Headquarters Prison No. 3401 dated 21-10-2020 and directed to appear before Superintendent Headquarters Prison Peshawar and to submit reply /reasons for this gross misconduct but you neither appear before the Superintendent Headquarters Prison Peshawar nor submitted your reply till date.

2- Mr. Jawad Gill, Assistant Superintendent Jail, attached to Central Prison Peshawar is hereby appointed as Inquiry Officer against the accused Warder with reference to the above allegations, under rule 10(1)(a) of the ibid rules.

3- The Inquiry Officer shall in accordance with the provision of the ibid rules, provide the reasonable opportunity of hearing to the above accused, record its findings, within fifteen days of the receipt of this order, recommendations as to punishment or other appropriate action against the above accused Warder.


4- The above accused Warders shall join the proceedings on the date, time and place fixed by the Inquiry Officer.


SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

Endorsement No: 38 90-93/-

Copy of the above is forwarded to the: -

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.
2. Mr. Jawad Gill, Assistant Superintendent, Central Prison Peshawar as Inquiry Officer for initiating proceedings against the above named Warder under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.
3. Warder Sajid S/O Spin Badshah (Cell # 03-13-9824967), C/o Superintendent Central Prison Peshawar with the directions to appear before the Inquiry Officer for the purpose of inquiry on the date, time & place fixed.
4. Superintendent Central Prison Peshawar for information with reference to his letter referred to above.


SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

CHARGE SHEET

I, Khalid Abbas, Superintendent Headquarters Prison Peshawar as
nt Authority, hereby charge you, Warder Sajid S/O Spin Badshah
1 to Central Prison Peshawar as follows: -

You have willfully absented yourself from your allotted duty as well as jail premises
w.e.f 28-03-2020 and resume on 12-04-2020 after 14 days of willful absence. Show
cause notice was served upon you vide this Headquarters Prison No. 1315-16 dated
22-04-2020 but reply of the same is awaited.

ii. You have been granted 03 days leave w.e.f 19-05-2020 and after expiry of said leave
you were remained absented from duty as well as Jail premises w.e.f 23-05-2020
and resume duty on 30-05-2020 after 07 days of absence. Show Cause notice was
again served upon you vide this Headquarters Prison No.1690-93 dated 03-06-2020
but reply of the same is awaited.

iii. You have been granted 03 days of medical rest w.e.f 24-07-2020 and after expiry of
said medical rest you remained absented from duty as well as from Jail premises
w.e.f 29-07-2020 and still at large, which constitutes gross misconduct on your
part. Final Show Cause Notice was served upon you at your home address vide this
Headquarters Prison No. 3401 dated 21-10-2020 and directed to appear before
Superintendent Headquarters Prison Peshawar and to submit reply /reasons for this
gross misconduct but you neither appear before the Superintendent Headquarters
Prison Peshawar nor submitted your reply till date.

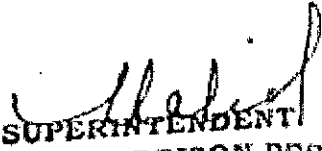
2- By reasons of the above, you appear to be guilty of misconduct under
rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline)
Rules, 2011 and have rendered yourself liable to all or any of the penalties
specified in rule-4 of the rules ibid.

3- You are therefore required to submit your written defense within 07
days of the receipt of this Charge Sheet to the Inquiry Officer.

4- Your written defense, if any, should reach to the Inquiry Officer/
Inquiry Committee within the specified period, failing which it shall be presumed
that you have no defense to put in and in that case ex-parte action shall be taken
against you.

5- Intimate whether you desire to be heard in person.

6- Statement of Allegations is enclosed.


SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
E-mail: hqprisonpeshawar@gmail.com

The Superintendent,
Central Prison, Peshawar.

Subject:- INQUIRY REPORT IN RESPECT OF WARDER SAJID S/O SPIN
BADSHAH

Respected Sir,

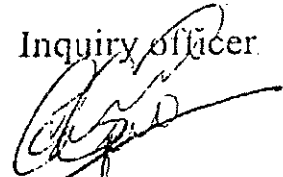
Reference your Endorsement No. 3890-93 dated 09-12-2020.

It is to bring in your kind notice that the accused warder was informed telephonically as well as via text message but he failed to submit his written reply against the charge sheet within stipulated period neither appeared before the undersigned/inquiry officer for his personal hearing.

RECOMMENDATIONS

In is therefore requested that ex-parte action may kindly be taken against the accused warder OR as deemed appropriate please.

Inquiry officer



(JAWAD GILL)

Assistant Superintendent
Central Prison Peshawar

ادبیات اور صحافت کی تاریخ اور ترقی

آپ کی صاحبزادی، لکھنؤ، ایشیا، بنگلہ دیش اور برطانوی ہندوستان میں جنم لیا۔ لیکن ناناؤں اور لکھنؤ
 کلکتہ، آگرہ اور احمد آباد، تحصیل تخت لکھنؤ میں پیدا ہوئے۔ بذریعہ اشتہار و ذرائع تبلیغ دنیا جاتا
 ہے کہ آپ 20/7/1920ء سے دہلی سے غیر حاضر ہوئے اور وہاں سے واپس آئے اور دہلی پر حاضر
 نہیں ہوئے۔ آپ کے خلاف ٹھکانہ کچھرائی اور بھارتیہ سوشلسٹ پارٹی کی قیادت میں
 چاروں گھنٹہ کی ہیر 93-3890 مورخہ 20/12/2020ء عمل میں آئی اور آپ کو
 ہلاکت کی گئی کہ تین دن کے اندر اندر ان کو آزادی فیئر کے سامنے پیش ہو کر بیان
 پیش کریں اور مترادف وقت پر برائے بذات خود مزید سامت کیلئے ان کو آزادی فیئر کے
 سامنے پیش ہوں۔ مگر آپ اپنے بیان پیش کرنے اور ان کو آزادی فیئر کے سامنے پیش
 ہونے میں تا کا مر ہے اور یہ حال غیر حاضر ہیں۔ چونکہ آپ کو اس بار سے میں گئی اور
 مطلع کیا گیا مگر ہے سو۔ اس کے بعد آپ کو بھارتیہ سوشلسٹ پارٹی اور ان کے
 چاروں گھنٹہ کی ہیر 38 مورخہ 21/1/2021ء کے اندر اندر ہر شہر میں
 Notice آئی جاری کیا گیا اور ہلاکت کی گئی کہ سات دن کے اندر ہر شہر میں
 کو اور ہندوستان میں ہر جگہ کے سامنے پیش ہو کر اپنی غیر حاضری کی وجوہات میں مگر آپ اپنی
 تک غیر حاضر ہیں۔

اس لئے آپ کو بذریعہ اشتہار ہذا آزادی فیئر میں مطلع کیا جاتا ہے کہ اشتہار ہذا کے شائع
 ہونے کے 15 دن کے اندر اندر ہر شہر میں ہر شہر میں ہر جگہ ہر جگہ کے سامنے پیش
 ہو کر اپنی غیر حاضری کی وجوہات میں ہر روز مگر آپ کے خلاف ایک طرف سے دہلی میں
 نکالی جائے گی جو کہ آپ کی ملازمت سے برخواستگی پر منتج ہو سکتی ہے۔

پیشہ ورانہ اشتہار کی تاریخ اور ترقی

”DAILY EXPRESS“ کے ذریعہ پاکستان
 INF(P)510/2021

DAILY EXPRESS

ادبیات اور صحافت کی تاریخ اور ترقی

پاکستان کے آئینہ سروسوں سے ایک وقت میں آگے جانے والے اخبار

MONDAY, FEBRUARY 1, 2021



پشاور اور اسلام آباد سبیک وقت شائع ہونے والے کثیر الاشاعت قومی اخبار

ABC CERTIFIED

جلد 54 اتوار 17 جمادی الثانی 1442ھ 31 جنوری 2021ء 19 ماہ قیت 30 روپے شمارہ 80

اعلانہ

آپ کسی ساجد ولد حسین بادشاہ جیل وارڈز حال سنٹرل جیل پشاور سٹک ہاؤس ایسٹ کمر
 ڈاکٹمنٹ اسم آ باہر تحصیل تحت نصری شلوع کرک بڈریو اشتہار بندہ مطلع کیا جاتا ہے کہ آپ
 29-07-2020 سے ڈیوٹی سے غیر حاضر ہیں اور تاحال ڈیوٹی پر حاضر نہیں ہوئے
 آپ کے خلاف حکمانہ کارروائی بمطابق پرنٹنڈنٹ ہیڈ کوارٹرز جیل پشاور قطبیری نمبر
 93-3890 مورخہ 09-12-2020 عمل میں لائی گئی اور آپ کو ہدایت کی گئی تھی کہ
 تین دن کے اندر اندر انکوٹری آفسر کے سامنے پیش ہو کر اپنا بیان پیش کریں اور متروکہ
 وقت پر برائے بذات خود مزید ساعت کیلئے انکوٹری آفسر کے سامنے پیش ہوں۔
 مگر آپ اپنا بیان پیش کرنے اور انکوٹری آفسر کے سامنے پیش ہونے میں ناکام رہے
 اور تاحال غیر حاضر ہیں۔ چونکہ آپ کو اس بارے میں کئی بار مطلع کیا گیا مگر بے سود۔
 اس کے بعد آپ کو بمطابق پرنٹنڈنٹ ہیڈ کوارٹرز جیل پشاور قطبیری نمبر 38 مورخہ
 05-01-2021 کو Final Show-Couse Notice بھی جاری کیا گیا اور
 ہدایت کی گئی کہ سات دن کے اندر اندر پرنٹنڈنٹ ہیڈ کوارٹرز جیل پشاور کے سامنے
 پیش ہو کر اپنی غیر حاضری کی وجہ بتائیں مگر آپ ابھی تک غیر حاضر ہیں۔
 اس لئے آپ کو بڈریو اشتہار بندہ آخری بار مطلع کیا جاتا ہے کہ اشتہار بندہ کے شائع
 ہونے کے 15 دن کے اندر اندر پرنٹنڈنٹ ہیڈ کوارٹرز جیل پشاور کے سامنے پیش ہو کر
 اپنی غیر حاضری کی وجہ بتائیں بصورت دیگر آپ کے خلاف یکطرفہ کارروائی عمل میں
 لائی جائے گی جو کہ آپ کی ملازمت سے برخاستگی پر منتج ہو سکتی ہے۔

پشاور اور اسلام آباد سبیک وقت شائع ہونے والے کثیر الاشاعت قومی اخبار

قصارا ایمان
کونسل قومی پاکستان

INF(P)
S10/2021

"Take Special Care
of Special Persons"

OFFICE ORDER

WHEREAS, the accused Warder (BPS-07) Sajid S/O Spin Badshah attached to Central Prison Peshawar was charge-sheeted within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of his misconduct contained in Statement of Allegations/ Disciplinary Action served upon him vide this Headquarters endorsement No. 3890-93 dated 09-12-2020 upon report of the Superintendent Central Prison Peshawar vide No. 13368/WE dated 20-10-2020, wherein Mr. Jawad Gill, Assistant Superintendent Jail, Central Prison Peshawar was appointed as Inquiry Officer.

AND WHEREAS, the accused Warder contacted by the Inquiry Officer to submit his written reply against the Charge Sheet and appear before the inquiry officer for personal hearing but fails to do so.

AND WHEREAS, the above accused Warder was served with final show-cause notice at his home address through register post vide this HQs memo No. 38 dated 05-01-2021, but reply of the same was also not submitted by the accused Warder.

AND WHEREAS, absence notice in respect of the accused Warder was also published in two daily newspapers i.e Mashriq dated 31-01-2021 and Express dated 01-02-2021 with the direction to report to the Superintendent Headquarters Prison Peshawar and explained his position within 15 days of the publication of notice but fails to do so.

NOW THEREFORE, in exercise of powers conferred under Rule- 9 & 14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 having considered the charges leveled against him in light of available record and as per recommendation of the Inquiry Officer, the undersigned being Competent Authority is pleased to initiate ex-parte action against the accused Warder and award him major penalty of **Removal From Service**.


SUPERINTENDENT

HEADQUARTERS PRISON PESHAWAR

Endorsement No: 567-681

Copy of the above is forwarded to the: -

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Superintendent Central Prison Peshawar with reference to his report quoted above. Proper entry to this effect may be made in his service book under proper attestation.
4. Mr. Jawad Gill, Assistant Superintendent Jail, Central Prison Peshawar (Inquiry Officer).
5. Pay Branch (Head Clerk) Central Prison Peshawar.
6. Official concerned.


SUPERINTENDENT

HEADQUARTERS PRISON PESHAWAR

۶۱۰
۲۰۲۰-۲۰۲۱

سہیل - جی

(۶۵)

Annexure D

~~بخدمت جناب پروفیسر~~

جناب عالی!

مہربان گزارش کی جاتی ہے کہ میں 25-07-2020 کو تین دن میڈیکل پریگیا تھا گروے میں پکتر تھی اس وجہ سے بہت زیادہ تکلیف تھا اس وجہ سے 30-07-2020 کو (PCNT) پریشن کیا جس کی وجہ سے ڈاکٹر نے دس دن کا آرام کا مشورہ دیا اور اس دن گزرنے کے بعد میری بیماری اور بھڑتی گئی اور میرے مٹانے اور گروے میں زخم پیدا ہو گئے اور میرے لئے کھڑا ہونا مشکل ہو گیا جسکی وجہ سے میں ڈیوٹی سرانجام نہیں دے سکتا تھا۔ چونکہ گروے اور صحت کا مسئلہ تھا اس وجہ سے اپنی ڈیوٹی سے غیر حاضر رہا اسی دوران مختلف ڈاکٹروں سے علاج جاری رہا اور ڈاکٹروں کے مطابق کہ اب ہر 25 دن بعد الٹراساؤنڈ کرے گے اور رپورٹ دیکھائے گے۔ اور رپورٹ آپ کے سامنے ہیں۔ لہذا آپ صاحبان مہربانی فرما کر مجھ کو ڈیوٹی پے او اور میں آئندہ ایسا کبھی نہیں کرونگا اور میں زندگی بھر آپ صاحبان کا احسان مند رہوں گا۔

شکریہ

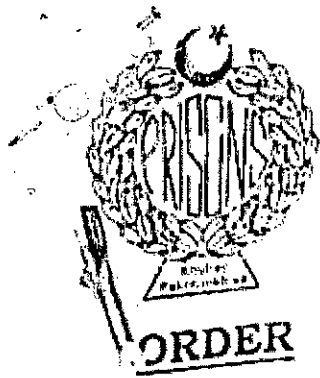
میں نوازش ہوگی

آپ کا تابعدار وارڈر محمد ساجد ولد سہیل بادشاہ

تاریخ 15-02-2021

سہیل

۲۰۲۰/۰۲/۱۵



OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

91-9210334, 9210406

091-9213445

No. Estb/Ward-i/Orders/ KC 8685

Dated 17-03-2021

WHEREAS, Warder Muhammad Sajid S/O Spin Badshah while attached to Central Prison Peshawar was awarded the major penalty of "Removal from service" by Superintendent HQs Prison Peshawar vide his office order No. 565 dated 17-02-2021 due to his misconduct and willful absence w.e.f 28-03-2020 to 11-04-2020, 23-05-2020 to 29-05-2020 and from 29-07-2020 to 17-02-2021.

AND WHEREAS, the said Warder preferred his departmental appeal for setting-aside the penalty awarded to him, which was examined in light of the available record of the case and it was observed that penalty awarded to him by the competent authority due to his willful absence after observing all legal and codal formalities as required under the E&D Rules 2011.

NOW THEREFORE, keeping in view the facts on record, the provision of rules in vogue and in exercise of powers conferred under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 read with Rule-05 of Khyber Pakhtunkhwa Service Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being without any substance.

ADDL; INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.

ENDST; NO. 8686-88 1..

Copy of the above is forwarded to:-

1. The Superintendent, Headquarters Prison Peshawar for information and necessary action with reference to his Order referred to above.
2. The Superintendent Central Prison Peshawar for information and necessary action. He is directed to inform the appellant accordingly and to make necessary entry in his Service Book under proper attestation.
3. Ex-Warder Muhammad Sajid S/o Spin Badshah Village Esot Kala P/O Ahmad Abad Tehsil & District Karak (0343-9824967) for information.

ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

17/3/2021

26/PB
For Record
18-3-2021