BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 571/2022 Titled Muhammad Zubair s/o Shah Nawaz ex-warder BPS
(07) Interment Centre Kohat.
<u>versus</u>
1. The Sectary to Govt: Home & Tribal Affairs Khyber Pakhtunkhwa, Peshawar.
2. The Inspector General of Prisons, Affairs Khyber Pakhtunkhwa, Peshawar.
3. The Superintendent Interment Centre Kohat.

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4. The Superintendent Circle/QS Prison DI Khan.

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..... (Respondents)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

VERSUS

- 1. The Sectary to Govt: Home & Tribal Affairs Khyber Pakhtunkhwa, Peshawar.
- 2. The Inspector General of Prisons, Affairs Khyber Pakhtunkhwa, Peshawar.
- 3. The Superintendent Interment Centre Kohat.
- 4. The Superintendent Circle/QS Prison DIKhan.

	(Respondents)
• • • • • • • • • • • • • • • • • • • •	/ I /

Subject: <u>Joint Para-wise comments/reply on behalf of Respondent No.01 to 04</u> <u>are as under</u>

Respectfully Sheweth;

Preliminary Objections:

- i. That the appellant has got no cause of action/locus standi.
- ii. That the instant appeal is badly time barred.
- iii. That the appellant has concealed the material facts from this honorable tribunal, hence liable to be dismissed.
- iv. That the appellant has not come to this honorable tribunal with clean hands.
- V. That the appellant has filed the instant appeal just to pressurize the respondents.
- vi. That the appellant has filed the instant appeal on malafide motives.
- vii. That the instant appeal is against the prevailing law and rules.
- viii. That the appellant is estopped by his own conduct to file this instant appeal.
- ix. That the present appeal is not maintainable in the present form and also in the present circumstances of the case.
- X. That the appeal is bad for misjoinder and non joinder of necessary parties.

Objection on Facts

- 1. That the appellant is completely ignorant from the fact that the Police and Prisons are different Departments. The appellant states that he was inducted into Police Department while the fact is that he was inducted into Prisons Department.
- 2. Incorrect and not admitted. The appellant in the very beginning had took no seriousness in his job and created hurdle for the administration, being sensitive force service such like lethargic attitude toward his designated duty is unwarranted and undesirable. The statement of the appellant is wrong as his actual performance has been unsatisfactory, resulting in major penalties. The following penalties

including major penalties were awarded to the appellant during his service:-

S. No	Detail of penalties awarded
1	Stoppage of one annual increment for one year vide superintendent Hq Prison Peshawar No. 1912 dated 09.06.2010
II	Stoppage of one annual increment without future effect vide superintendent HQ prison Bannu No. 2755 dated 30.07.2011
\$11	Awarded major penalty of Removal from Service for his long absence and presenting fake / bogus medical certificates vide HQ Prison D.I.Khan No. 7768-73 dated 19.11.2012
IV	Awarded major penalty of Removal From Service vide superintendent HQ prison D.I.Khan No.409 dated 16.01.2014
V	Awarded minor penalty of Censure vide HQ prison D.I.Khan No. 621 dated 04.12.2019
VI	Stoppage of one increment for one year and absence period from 26.11.2019 to04.12.2019 treated as Leave Without Pay vide HQ Prison D.I.Khan No. 698 dated 05.03.2020.
VII	Major penalty of Compulsory Retirement from service vide HQ D.I.Khan No. 2509-12 dated 25.06.2021

From the perusal of the above aforementioned penalties, it is crystal clear that the appellant had no interest in his service which leads to his Compulsory Retirement from Service.

- 3. That the appellant is habitual absentee and did not take interest in duties. The appellant violated the provision of Khyber Pakhtunkhwa Prison Rules 2018 Rule 1083 (Annex-A) which indicate that in case of wilful absence due to unavoidable circumstances a mechanism of granting of leave has been provided while the appellant not followed the same line and remained absent without the approval of the competent authority.
- 4. Incorrect. That the respondent No.03 reported against the appellant vide No. 1640 dated 26.05.2021 (Annex-B) regarding the absence of the appellant. The appellant is malingerer who always absented himself from duties on one pretext or other as is evident from his past record. He was served show cause notice vide No. 2004 dated 28.05.2021 with personal hearing date fixed for 04.06.2021 (Annex-C).
- 5. Incorrect. That as mentioned at Para-04 of objection on facts, the appellant was awarded opportunity of personal hearing on 04.06.2021 before Respondent No.04 and then another opportunity of personal hearing was afforded by Respondent No.02 on 25.08.2021.
- 6. Pertains to record. That the appellant was awarded major penalty of

- Compulsory retirement from service being habitual of absence and not taking interest in duties by respondent No.04 vide No. 2508 dated 25.06.2021 (Annex-D).
- 7. Incorrect. That the appellant filed departmental appeal before Respondent No.02 (Annex-E) on dated 14.07.2021 which was decided by the respondent No.02 vide No. 27644 dated 27.08.2021 (Annex-F). It is pertinent to mention here that the actual appeal which was filed by the appellant before Respondent No.02 was filed on 14.07.2021 and written in Urdu while the appellant has shown departmental appeal before the Honourable Service Tribunal (placed at page No.19 of the appeal) is in English language (Annex-G) and completely different from the original departmental appeal. This again shows that the appellant is not true in his statement and even malingering before the Honourable Court.
- 8. Incorrect. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar being the appellate authority after examining the material facts available on record and views provided by respondent No.04 as mentioned in Para-07 on objection on Facts the departmental appeal has been rejected by the Respondent No.02 vide No.27644 dated 27.08.2021 (Annex-H)

OBJECTION ON GROUNDS

- A. Incorrect. The orders of compulsory retirement form service passed by the respondent No.04 vide No. 2508 dated 25.06.2021 is lawful, legal and based on facts.
- B. As elaborated in Para-A of objection on grounds.
- C. Incorrect. Legal proceedings have been carried out against the appellant.

 Ample opportunities were granted to the appellant to defend himself. Proper disciplinary proceedings were carried out vide No. 2003-04 dated 28.05.2021 with opportunity of personal hearing before the respondent No.04 on dated 04.06.2023 and another opportunity of personal hearing was granted before the respondent No.02 vide No. 27644 dated 27.08.2023 on 25.08.2023.
- D. As elaborated in Para-02 & 04 of objection on facts.
- E. Incorrect. That the departmental appeal was filed by the appellant on

dated 14.07.2021 before Respondent No.02. The appellant appeared before the Respondent No.02 for personal hearing on 25.08.2023. His departmental appeal was rejected by the Respondent No.02 vide No. 27644 dated 27.08.2023 being without any substance and habitual offender.

- F. That the appellant is habitual offender and do not deserve for any leniency.
- G. Incorrect. The appellant is habitual offender. His past record mentioned in para-02 of objection on facts speaks about his past adverse record.
- H. Incorrect. The appellant do not deserve to be re-instated being habitual offender and not fit for the sensitive force service which requires strict discipline and regularity which do not fulfil by appellant concerned.
- The respondents seek leave to raise additional grounds at the time of arguments.

PRAYER:

It is therefore most humbly prayed that on the acceptance of above Joint Para-wise comments on behalf of respondent No. 01 to 04, the appeal of the appellant may graciously be dismissed being devoid of merit and against the law.

SECRETARY TO GOVERNMENT
HOME & TAS DEPARTMENT

KHYBER PAKHTUNKHWA
RESPONDENT NO.01
Frome Secretary.

Khyber Pakhtunkhwa

INTERNMENT CENTRE

KOHAT

RESPONDENT NO.3

INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA
PESHAWAR
RESPONDENT NO.02

SUPERINTENDENT¹
CIRCLE HEADQUARTER PRISON
D.I.KHAN
RESPONDENT NO.04

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

***************************************	(Appellant)
Centre Kohat.	
Titled Muhammad Zubair s/o Shah Nawaz ex-warder BPS (07) Interment
Service Appeal No. 571/2022	
In the matter of	

VERSUS

- 1. The Sectary to Govt: Home & Tribal Affairs Khyber Pakhtunkhwa, Peshawar
- 2. The Inspector General of Prisons, Affairs Khyber Pakhtunkhwa, Peshawar.
- 3. The Superintendent Interment Centre Kohat.
- 4. The Superintendent Circle/QS Prison DIKhan.

..... (Respondents)

AFFIDAVIT

We the following respondents do hereby solemnly affirm and declare that the contents of Para-wise Comments are true and correct to the best of our Knowledge and belief and nothing have been concealed from this Honorable Service Tribunal.

SECRETARY TO GOVERNMENT
HOME & TAS DEPARTMENT
KHYBER PAKHTUNKHWA
RESPONDENT NO.01
Home Secretary,

Khyber Pakhtunka.

INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA
PESHAWAR

RESPONDENT NO.02

SUPERINTENDENT

INTERNMENT CENTRE

KOHAT

RESPONDENT NO.3

SUPERINTENDENT
CIRCLE HEADQUARTER PRISON
D.I.KHAN
RESPONDENT NO.04

- 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.
- 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 forth-with 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.



OFFICE OF THE SUPERINTENDENT/INCHARGE INTERNMENT CENTRE KOHAT No. 1640 dt. 26/05/802/

The Superintendent, Circle Headquarter Prison D.I.Khan.

Subject: - NON ARRIVAL REPORT OF WATCH & WARD STAFF.

Wemo:

It is submitted that Warder Muhammad Zubair S/O Shah Naraz relieved from Central Prison Bannu on 27-04-2021 (A.N) with Nil days joining time vide his docket Endst No.2554-56 dated: 27-04-2021 and Warder Zaki Ullah relieved from Central Prison Bannu on 21-05-2021(A.N) with Nil days joining time vide his docket Endst No.2947-49 dated:21-05-2021 and both Warders not reported to Internment Centre Kohat up to till date 26-05-2021.

Submitted for information please.

SUPERINTENDENT/INCHARGE INTERNMENT CENTRE KOHAT

Endst No._____/

Copy of the above is forwarded to The Superintendent Central Prison Bannu for information please.

SUPERINTENDENT/INCHARGE INTERNMENT CENTRE KOHAT

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JWCAUSE NOTICE UNDER RULE-5 (I) READ WITH RULE-7 OF THE JYBER PUKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY & ECIPLINE) RULES.2011.

You warder (BPS-07)Muhammad Zubair s/o Shah Naraz were relieved by the superintendent Central Prison Bannu on 27.04.2021 with nil days joining time vide No. 2554-56 dated 27.04.2021 and you were due to resume duty at Internment Centre Kohat on 28.04.2021 but you absented yourself and did not report for duty at Internment Centre Kohat till date i.e 28.05.2021.

I, Muhammad Binyamin Superintendent Headquarter Prison DIKhan competent authority, am satisfied by the report submitted by the Superintendent Internment Centre Kohat and there is no need of holding any further inquiry.

Now therefore, you above named warder are hereby called upon to show cause Within 07 days of receipt of this notice as to why the punishment of Removal from Service may not be awarded to you for your above stated act of negligence and mis-conduct.

In case your reply does not reach this office within stipulated period ex-party Action shall be taken against you.

You may appear before the undersigned for personal hearing on if you wish to.

SUPERINKENDENT
CIRCLE H/QS PRISON DIKHAN

Endst No.. 2003-04 dated 28 / 05 /2021

Copy of the above is forwarded to :-

- 1. Superintendent Internment Centre Kohat w/r to his No. 1640 dated 26.05.2021, a copy of show cause notice duly signed / dated by the accused warder may please be returned to this Headquarter as a token of receipt and office record.
- 2. Warder (BPS-07) Muhammad Zubair s/o Shah Naraz R/O Kotka Mir Dil Sorani, P.O Nezam Bazar Thesil and District Bannu.

SUPERINTENDENT CIRCLE HOS PRISON DIKHAN

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PRISONS CIRCLE HEAD QUARTER D.I.KHAN

No. 250 / PB Date 25-26-202/

PHREAX \No. 0966-9280299

cpdikhan1@gmail.com

OFFICE ORDER

WHEREAS, the accused Mr. Muhammad Zubair s/o Shah Naraz warder attached to Internment Centre Kohat was proceeded against under Rule-3 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges that he was relieved by the Superintendent Central Prison Bannu on 27.04.2021 with nill days joining time and he was due to resume duty at Internment Centre Kohat on 28.04.2021 but he absented himself from duty w.e.f 28.04.2021 to 15.06.2021.

AND WHEREAS, he furnished reply but the same was found unsatisfactory.

AND WHEREAS, the undersigned being competent authority granted him the opportunity of personal hearing on 04.06.2021 as provided for under rules ibid. The accused official completely failed to defend his case with documentary proof/evidence.

NOW therefore, in exercise of powers conferred under Rule-14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, having considered the charges, evidence on record, the explanation of the accused official and after affording the opportunity of personal hearing, the undersigned being competent authority, hereby award Major penalty of "COMPULSORY RETIREMENT FROM SERVICE" to Mr.Muhammad Zubair s/o Shah Naraz warder attached to Internment Centre Kohat for his willful absence. The period of his absence w.e.f 28.04.2021 to 15.06.2021 is hereby treated as Leave Without pay.

Endorsement No. 2529-12

SUPERINTENDENT CIRCLE H/QS PRISON DIKHAN

(L)

Copy of the above is forwarded to :-

- 1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
- 2. The Superintendent Internment Centre Kohat. Necessary entry may please be made in the Service Book of official concerned under proper attestation.
- 3. DAO Kohat.
- 4. Warder Muhamamd Zubair s/o Shah Naraz attached to Internment Centre Kohat.

SUPERINTENDENT CIRCLE HOS PRISON DIKHAN mb 126/11/2 = 20 30 6 8 3/ 20 5/ 25/20 9/5/ 1000 19 8 man 50 17 (2000)=111万户第一个的 -201.11.0 h Stew 040 = 11.4 4 3 3 2 10 1) Khan O' A Land Ville 1919 1819 16 SPELE DAG = (61 D) = 18 (2 20) 2/19 (1) 10 (010 0 20 14 2 16/2 10/2 ALLES 18/22)

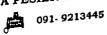
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INSPECTORATE GENERAL OF PRISONS KHYBER PAKHTUNKHWA PESHAWAR

091- 9210334, 9210406



https://www.facebook.com/kpkprisons prisonsig@gmail.com

- 2031 1-No. Dated.

To,

The Superintendent,

Circle Headquarters Prison D.I Khan.

Subject:-

DEPARTMENTAL APPEAL

I am directed to refer to the subject and to forward herewith a copy Memo: of appeal submitted by Ex-Warder Muhammad Zubair S/O Shah Nazar attached to IC Kohat on the captioned subject (self-explanatory).

Please look into the matter and furnish your necessary views/comments along with history of his service on the below noted format for Penalty if any

further necessary action by this office:-Detail Of awarded Date of Postings Date of appointment. Rank Name & S.No. Birth Parentage

> ASSISTANT DIRECTOR INSPECTORATE GENERAL OF TRISONS KHYBER PAKHTUNKHWA PES



OFFICE OF THE SUPERINENDENT
PRISONS CIRCLE HEAD QUARTER D.I.KHAN
No. 33 RR/Ws / HQ Date 02 --08 -2021
PH&FAX \No. 0966-9280299
cpdikhan1@gmail.com

To,

The Inspector General Of Prisons, Khyber Pakhtunkhwa Peshawar.

Subject:

DEPARTMENTAL APPEAL.

Respected Sir,

Kindly refer to your memo No. 23377-we dated 16.07.2021.

It is submitted that the superintendent/Incharge Internment Centre Kohat reported vide No. 1640 dated 26.05.2021 that warder Muhammad Zubair s/o Shah Naraz was relieved by the superintendent Central Prison Bannu on 27.04.2021 with nil days joining time vide relieving docket No. 2554-56 dated 27.04.2021 for further duty at Internment Centre Kohat but he had not reported arrival at Internment Centre Kohat till 26.05.2021. Therefore, Showcause Notice No. 2003-04 dated 28.05.2021 was on his home address with personal hearing date fixed on 04.06.2021.

The said Ex-warder appeared for personal hearing on fixed date i.e 04.06.2021 however he could not produce satisfactory reply.

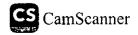
Keeping in view his previous record, unsatisfactory reply and least interest in his duties the said ex-warder was awarded major penalty of compulsory retirement from service.

Such like irresponsible attitude on part of the appellant is intolerable and does not deserve to be treated leniently, hence his appeal may be rejected having no solid grounds.

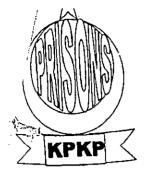
S. No	Name and parentage	Rank	Date of birth	Date of appointment	Detail of postings	Penalty if any
01	Muhammad Zubair s/o Shah Naraz	Warder	05.02.1976	04.10.2007	Given in table-A	Given in table-B

Table-A

S. NO	Name of Jail
01	Central Prison Bannu
02	Central Prison DIKhan
03	Central Prison Bannu
04	Central Prison DIKhan
05	Central Prison Haripur
06	Central Prison Bannu
J7	Internment Centre Lakki Marwat
08	Central Prison Bannu
09	Internment Centre Kohat







OFFICE OF THE SUPERINENDENT PRISONS CIRCLE HEAD QUARTER D.I.KHAN

HQ Date_ PH&FAX \No. 0966-9280299 cpdikhan1@gmail.com

Table-B

S. No	Detail of penalties awarded
	Stoppage of one annual increment for one year vids superintendent Hq Prison Peshawar No.
01	
02	Stoppage of one annual increment without future effect vide superintendent HQ prison Bannu
•-	No. 2755 dated 30.07.2011
03	No. 2755 dated 30.07.2011 Awarded major penalty of Removal from Service for his long absence and presenting fake / bogus medical certificates vide HQ Prison D.I.Khan No. 7768-73 dated 19.11.2012 bogus medical certificates vide HQ Prison D.I.Khan No. 7768-73 dated 19.11.2012
04	Awarded major penalty of Removal From Service vide super
	No.409 dated 16.01.2014 Awarded minor penalty of Censure vide HQ prison D.I.Khan No. 621 dated 04.12.2019
05	
06	Stoppage of one increment for one year and absence period from 26.11.2019 to04.12.2019 treated as Leave Without Pay vide HQ Prison D.I.Khan No. 698 dated 05.03.2020. Major penalty of Compulsary Retirement from service vide HQ D.I.Khan No. 2509-12 dated
07	Major penalty of Compulsary Retirement Hold service 25.06.2021

SUPERINTENDENT CIRCLE H/QS BRISON DIKHAN



The Inspector General of Prison Khyber Pakhtunkhwa Peshawar

Subject:- DEPARTMENTAL APPEAL AGAINST THE

IMPUGNED ORDER DATED 25.06.2021

WHEREBY THE MAJOR PENALTY OF

COMPULSORY RETIREMENT FROM SERVICE

OF THE APPELLANT HAS BEEN IMPOSED.

Respectfully Sheweth,

- 1. That the Appellant was inducted into service of the Police Department, after going through the Mandatory required test and interviews, since 2007.
- 2. That since recruitment in this prestigious Force, the Appellant left no stone unturned in performance of his duties and ever proved his mental, wetted skill and potential for rendering meritorious services and this is the reason that the Appellant has always won the appreciation of his high ups.
- 3. That this was the back drop when the Appellant fall seriously ill and was confined to bed for almost 48 days. (Copies of Medical prescription are attached)
- 4. That because of the absence, which was certainly beyond the control of the Appellant, the Appellant was neither served with show cause notices nor statements of allegations.

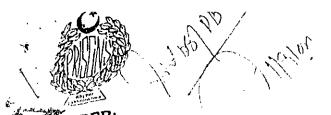
5. That the Superintendent Circle without giving an opportunity of personal hearing passed the H/Qs Prison DI Khan impugned order No 2509-12 dated 25.06.2021 vide which the Appellant was compulsory retired from service. (Copy of the impugned Order dated 25.06.2021 is attached)

It is therefore, humbly and respectfully prayed that on acceptance of this appeal, the impugned Order of Compulsory Retirement from Service dated 25.06.2021 may kindly be set aside and the Appellant may kindly be allowed to perform his duties on his post.

Dated: 23.07.2021

Muhammad Zubair

son of Shah Naraz Ex-Warder Internment Centre Kohat



KHYBER PAKHTUNKHWA PESHAWAR

ORDER: WHEREAS, Warder Muhammad Zubair S/O Shah Naraz while attached to Interment Center Kobat was awarded the major penalty of "Compulsory Retirement from Service" and "the period of his absence w.e.f 28-04-2021 to 15-06-2021 treated as leave without pay" by the Superintendent Headquarters Prison D.I Khan vide his office order No. 2508 dated 25-06-2021 due to his willful absence for the period quoted above.

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 the charges leveled against the appellant were proved. Moreover, his past service record is also adverse and speak that he is habitual offender

AND WHEREAS, he was afforded an opportunity of personal hearing on 25-08-2021. During the course of hearing, he explained his position and his plea was found unjustified and unsatisfactory.

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.

> INSPECTOR GENERAL OF PRISONS, KIIYBER PAKHTUNKHWA, PESHAWAR.

Endst; No. 27645-48.

Copy of the above is forwarded to:

1. The Superintendent Headquarters Prison D.I Khan for information and necessary action with reference to his letter No. 3388/WE dated 02-08-2021.

2. Incharge Interment Center Kohat for information and necessary action. He is directed to inform the appellant accordingly and also make necessary entry in his Service Book under proper attestation.

3. The District Accounts officer concerned for information and necessary action.

Appellant concerned C/O Incharge Interment Center Kohat for information.

KHYBER PAKHTUNKHWA PESH



OFFICE OF THE INSPECTORATE GENERAL OF PRISONS KHYBER PAKHTUNKHWA PESHAWAR

2091-9210334, 9210406 091-9213445

No. 90/4/ Dated 22-6-2022

AUTHORITY LETTER

Mr.Sulaiman, Law Officer(BPS-17) attached to the office of Inspector General of Prisons Khyber Pakhtunkhwa Peshawar is hereby authorized to make affidavit, to file comments/reply and to attend the Lower Courts, Ombudsperson, Khyber Pakhtunkhwa Service Tribunal, Peshawar High Court Peshawar, Supreme Court of Pakistan Islamabad, Federal Shariat Court, meeting of scrutiny committee at Law Department and also to attend the office of Additional Advocate General Khyber Pakhtunkhwa at Peshawar on each and every date of hearing, on behalf of the Inspector General of Prisons Khyber Pakhtunkhwa.

INSPECTOR GENERAL OF PRISONS KHYBER PAKHTUNKHWA PESHAWAR