


S.No	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	18.05.2016	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.</u> <u>PESHAWAR.</u></p> <p style="text-align: center;">APPEAL NO.1420/2014</p> <p style="text-align: center;">(Ziaullah-vs-Govt: of Khyber Pakhtunkhwa, through Secretary Home, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar and others).</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER:</u></p> <p>Appellant with counsel (Muhammad Ilyas, Advocate) and Additional AG for respondents present.</p> <p>2. Recruited as Jail Warder in the Prison Department in 2013, the appellant was terminated from service vide order dated 14.10.2014 on the ground of absence from duty on 13.10.2014 and his unsatisfactory work and conduct. His departmental appeal was also rejected vide order dated 16.12.2014, hence this service appeal under Section -4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.</p> <p>3. Arguments heard and record perused.</p> <p>4. From perusal of the record it was found that no charge sheet or show cause notice has been issued to the appellant much less any departmental inquiry against him. According to the respondent-department since the appellant was in probation, therefore, he could be terminated without any notice. This Tribunal does not subscribe to the said view of the respondent-department as opportunity</p>

of defense and personal hearing in such like cases when a civil servant is also stigmatized beside loss of service, is an inalienable right being requirement of the natural justice. Since no opportunity of hearing and defense has been provided to the appellant, therefore, we are constrained to set aside the impugned orders. Consequently, the impugned orders are set aside and the case remanded to the respondent-department to proceed *de-novo* against the appellant. He be given full opportunity of defense and hearing. Needless to mention that for the purpose of *de-novo* proceedings the appellant is reinstated into service. The issue of back benefits be also decide by the department in the light of the *de-novo* proceedings. Parties are left to bear their own cost. File be consign to the record room.


(MUHAMMAD AAMIR NAZIR)
MEMBER

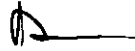

(PIR BAKHSH SHAH)
MEMBER

ANNOUNCED
18.05.2016

14.10.2015

Appellant in person and Asst: AG for respondents present.

Arguments could not be heard due to shortage of time. To come up for arguments on 8-2-16.



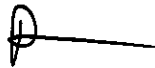
Member



Member

08.02.2016

Counsel for the appellant and Asst: AG for respondents present. Since we are busy in larger bench therefore, the instant appeal is adjourned to 18.5.16 for arguments.



MEMBER



MEMBER

2. 21.1.2015

Appellant with counsel present. Counsel for the appellant submitted that major penalty awarded to the appellant but no proper enquiry conducted. He further submitted no show cause notice has been issued to the appellant. Points raised need consideration. The appeal is admitted for regular hearing, subject to all legal exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 6.3.2015.



MEMBER

06.3.2015

Appellant with counsel and Mr. Muhammad Jan, GP with Sheryar, ASJ for the respondents present. Representative of the respondents submitted that written reply is in process of completion and for the purpose requested for further time. To come up for written reply on 13.4.2015.



MEMBER

13.04.2015

Appellant with counsel and Mr. Sheharyar Khan, ASJ along with Addl: A.G for respondents present. Para-wise reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 14.10.2015.



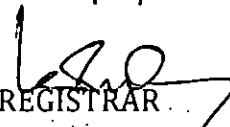

Chairman

*Appellant deposited
Process fee & Security
Rs. 3500/- Bank Receipt
attached with file.*

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1420/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	22.12.2014	<p>The appeal of Mr. Zia Ullah presented today by Mr. Muhammad Ilyas Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR.</p> <p>This case is entrusted to Bench for preliminary hearing to be put up to the file returned from the main file to be</p> <p>None is available on behalf of the appellant Notice be issued to appellant and is directed to come up for preliminary hearing on 30/12/14</p> <p style="text-align: center;"></p>
2	21/12/14	

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,

PESHAWAR

Services Appeal No. 1420 /2014

Zia Ullah

VERSUS

Government of Khyber Pakhtunkhwa etc

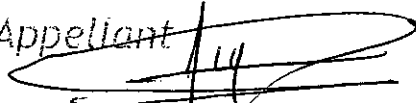
INDEX

S.No	Description	Annexure	Pages
1.	Grounds of Services appeal		1-4
2.	Affidavit		5
3.	OFFICE ORDER OF TERMINATION DT: 14.10.14	Ann - A	6
4.	DEPARTMENTAL APPEAL DTA: 22.10.2014	Ann - B	7 to 9
5.	IMPUNGED APPEAL ORDER DT: 16.12.14	Ann - C	10
6.	WAKALAT NAMA		11
7.	—		
8.	—		

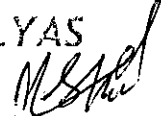
Dated: 22/12/2014

Through


Appellant


MUHAMMAD ILYAS

&


MUHAMMAD SHABIR KHALIL

&


SAQIB BARI

Advocate, High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Services Appeal No. 1420 /2014

~~1. W. J. Peshawar~~
~~Services Tribunal~~
1459
22/12/14

Zia Ullah Son of Abbas Khan, Ex-Jail Warder resident of Mohallah Gul Bagh Kallay, Tehsil & District Hangu.

... APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa, through Secretary Home, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. Inspector General Prisons, Khyber Pakhtunkhwa, Peshawar.
3. Superintendent Jail District Jail ~~KARAK~~.
4. Superintendent Circle Headquarter Prison , Dera Ismail Khan.

... RESPONDENTS

~~1. W. J. Peshawar~~
~~Services Tribunal~~
22/12/14

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974
R/W KHYBER PAKHTUNKHWA EFFICIENCY AND
DISCIPLINE RULES 2011 AGAINST IMPUGNED
ORDER NO. 11561-64, DATED 14/10/2014 AND
IMPUGNED APPELLATE ORDER NO. 30980,
DATED 16/12/2014, HEREBY THE APPELLANT
HAS BEEN TERMINATED FROM SERVICE

PRAYER:

ON ACCEPTANCE OF THIS SERVICE APPEAL
THE IMPUGNED ORDER AS WELL AS IMPUGNED
APPELLATE ORDER MAY PLEASE BE SET ASIDE
AND APPELLANT BE REINSTATED IN SERVICE
WITH ALL BACK WAGES AND BENEFITS WITH
SUCH OTHER RELIEF AS MAY DEEM FIT IN THE
CIRCUMSTANCES OF THE CASE MAY ALSO BE
GRANTED

RESPECTFULLY SHEWETH,

Short facts giving rise to present service appeal are as under: -

1. That the appellant has been serving as Jail Warder in prison Department since 17/05/2013.
2. That the appellant has been terminated from service by respondent no. 4 through order no. 11561-64, date d14/10/2014 without following legal formalities i.e. show cause notice, inquiry and personal hearing. (Copy of order no. 11561-64, dated 14/10/2014 is annexed as annexure A).
3. That against the impend order appellant submitted his departmental appeal / representation to respondent no.2. (Copy of departmental appeal is annexure B). the said appeal may please be treated as integral part of my appeal as well.

4. That on 16/12/2014 the competent authority i.e. respondent No.2 rejected the appeal of appellant hence this service appeal on the following amongst other grounds; - (Copy of the impugned rejection order is attached as annexure C).

GROUND; -

- A. That the impugned termination from service as well as impugned appellate order are illegal, unlawful, void, and ineffective upon the rights of the appellant.
- B. That same impugned termination from service as well as impugned appellate order are against the principle of natural justice also.
- C. That no show cause notice, no charge sheet or statement of allegations was serviced upon the appellant, nor any inquiry (Formal or regular) has been conducted by respondents in order to separate chiefs from grain.
- D. That prior to issuance of impugned order, impugned appellate order no meaningful / purposeful chance of personal hearing was granted to the appellant.
- E. That the impugned appellate order is in violation of section 24-A of General Clauses Act as the competent authority has failed to cite any reason or justification in the said order.

F. That it is well established principle of natural justice, enshrined in the precedent of superior courts as well. That where the competent authority is going to impose the penalty of removal / termination etc the regular inquiry to that effect is necessary / must.

G. That all the proceedings initiated ~~against~~ the appellant were malafide and malicious and purportedly were initiated in order to displace the appellant from his post and appoint any other blue eyed.

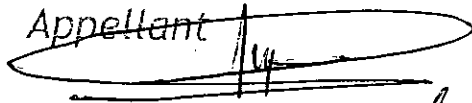
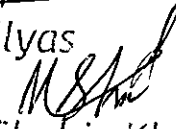

H. That the punishment as imposed is too harsh and is a major one.

I. That no one shall be condemned unheard.

It is, therefore, requested that the subject appeal be accepted as prayed for in the heading of the appeal.

Dated: 22/12/2014

Through

حیات
Appellant 
Muhammad Ilyas
& 
Muhammad Shabir Khalil
& 
Saqib Bari
Advocate, High Court Peshawar

Certificate:

Certified that as per instructions of my client no such like services appeal has earlier been filed.


Advocate

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Services Appeal No. _____/2014

Zia Ullah

VERSUS

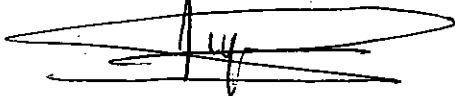
Government of Khyber Pakhtunkhwa etc

AFFIDAVIT

I, Zia Ullah Son of Abbas Khan, Ex-Jail Warder resident of Mohallah Gul Bagh Kallay, Tehsil & District Hangu do hereby solemnly affirm and declare on oath that the contents of the instant services appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Forum.

ذیاء اللہ
DEPONENT

Identified by:



MUHAMMAD ILYAS ORAKZAI

Advocate, High Court Peshawar





① Anx-A

(101)

OFFICE OF THE
SUPERINTENDENT
CIRCLE H/Qs PRISON D.I.KHAN
No. _____/HQ Dt; _____

OFFICE ORDER

As recommended by the Superintendent District Jail Karak vide his memo No.1350 dated 14-10-2012 newly recruited Warder Zia Ullah attached to District Jail Karak absented himself from duty and line with effect from on 13-10-2014 and his work & conduct is un-satisfactory, therefore, the above named temporary warder is hereby **TERMINATED** from service with immediate effect being **PROBATIONER**.

His date of appointment is 17-5-2013

SUPERINTENDENT
CIRCLE H/Qs PRISON DIKHAN

No. 11561-64 Dated 14/10/2014

Copy of the above is forwarded to the:-

1. Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar for information with reference to above please.
2. Superintendent Headquarter Prison Peshawar for information.
- ✓ 3. Superintendent District Jail Karak for information w/r to above.
4. District Accounts Officer Karak for information and necessary action.

SUPERINTENDENT
CIRCLE H/Qs PRISON DIKHAN.

No 733
21/10/14

DS LO H
Zia Ullah
as per order.
21/10/14

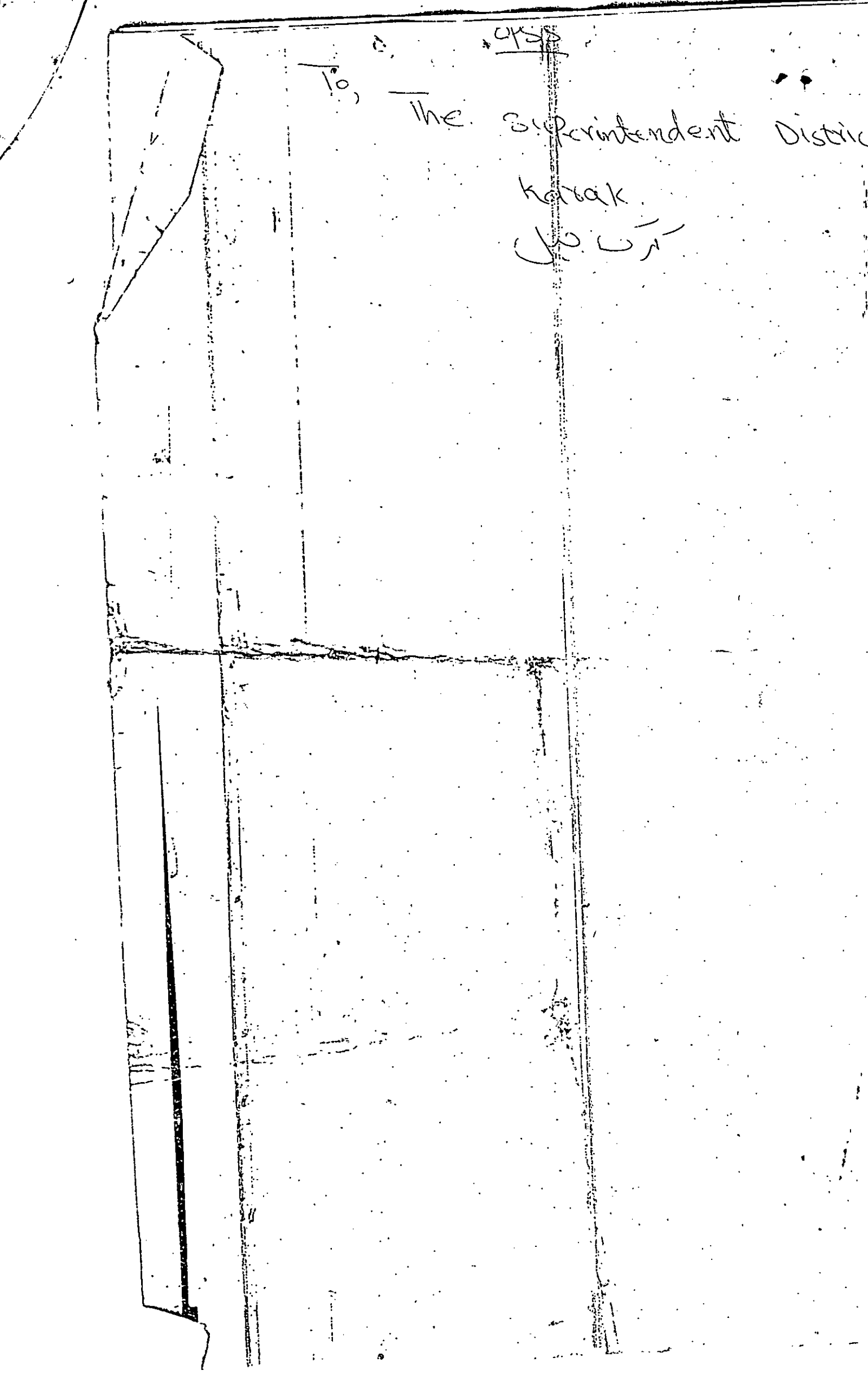
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To,

The Superintendent District

Katak.

Ch. C. C.



حضرت جناب انسہلہ رحیل جیلخانہ جات ضیہ پور خواہ لٹا اور

عنوان اپیل

PRISON DEPARTMENT
Inspector General
A.I.G.
Adl. جناب عالی

22/10/14

موجودہ نذرانہ ہے کہ سائیل ایک زیر سایہ جیت وادور ڈسٹرکٹ جیل ٹرک میں ڈیوٹی سرانجام دیا تھا۔ دوران سروس اعتراف بالا کو کبھی بھی شکایت کا موقع نہیں دیا۔

جناب عالی! دوران ڈیوٹی مورچہ 2014-10-11 کو میری طبیعت اچانک خراب ہوئی اور میں گاڑی چلا گیا کیونکہ میرے پاس علاج کے لئے کوئی تھ نہیں۔ وہاں جا کر ہسپتال کا رخ کیا اور میری دل کی امیسیٹی ایچ ٹیو ہسپتال منگوانے میں فیسٹ وغیرہ فراہم ہر طرف 03 دن کے لئے ریسیٹ ملا جو کہ درخواست کے ساتھ لف ہے۔ تین دن نذرانہ کے بعد جیل میں پہنچا تو مجھے پتہ چلا کہ مجھے نوٹری سے برخواستہ کیا گیا ہے جسکی فوٹو کاپی لف ہے۔

جناب عالی سے دوران اپیل کی جاتی کہ سائیل کو نوٹری سے دوبارہ بحال کیا جاوے کیونکہ مجھے نہ تو کوئی شواہد ملے اور نہ مجھے بولنے کا موقع دیا گیا۔ جناب عالی میرا ساتھ سراسر زیادتی ہوئی ہے۔ کوئی رٹوائری نہیں ہوئی ہے۔

سائیل تادم زلیست عیاں توہ رہے گا۔

22/10/2014

عمر لے

20703
22-10-14
ولید عباس خاں

24/10/14

آریکا فرہان بردار سابقہ وادور ضیہ پور خواہ
خولہ گل باغ کالے محض و ضلع بنکو

Mob: 0336-9399355

8

(101)

OUT-DOOR PATIENT'S TICKET

Institution: _____
 District: _____

Yearly OPD No. 1992

Name: Willie
 Father's/Husband's Name: _____
 Age: _____ Sex: _____ Address: _____
 Health Problem / Diagnosis: _____
 Patient Seen By: _____

Date(s)	History / Clinical Findings / Action Taken
11/10/14 Adv. MP w/le-T	D TAs w/ri del samp + 1 D TAs = 20 psu - DS 3 sup - Complex + L Adv. Complete Bed rest for three days

CONSULTANT
 MEDICAL OFFICER
 HOSPITAL
 HANGU

11-1-14



Pt. Name مہتاب اللہ

Sex M Date 11.10.2014 Test Required MR - 11/10/14

Latr. No. _____

URINE EXAMINATION	
COLOR	_____
REACTION	_____
ALBUMIN	_____
SUGAR	_____
R.B.C.	_____
PUS CELL	_____
OTHER	_____

STOOL EXAMINATION	
Color	_____ Mucus _____
Reaction	_____ R.B.C. _____
Pus Cell	_____ Ova _____

SEMEN ANALYSIS	
Color	_____ Total Count _____
Volume	_____ Active _____ %
Viscosity	_____ sluggish _____ %
	_____ Dead _____ %
	_____ Pus Cell _____

HAEMATOLOGY		
TEST	RESULT	NORMAL
Hb%	<u>9</u> G/dl	M-12 - 18 F-12 - 16
TLC	_____ cmm	4000 - 11000
DLC	Pol: _____ %	45 - 70
	Lympho _____ %	20 - 45
	Monocyt _____ %	2 - 9
	Eosinophils _____ %	2 - 6
	Basophils _____ %	0 - 10
ESR	_____ min	M-1 - 10 F-5 - 15
Platelet Count	_____ cmm	150,00-400,000
B.T.	_____ min	1 - 4
C.T.	_____ min	2 - 7

SEROLOGY		
WIDAL	<u>Positive TO 1/160 1/160</u>	
MP	<u>Negative</u>	
R.A. Factor	_____	_____
ASO Titer	_____	upto 200 iu/ml
Toxoplasmosis	_____	_____
Brucella	_____	Abrt. Melt.
Hbs Ag	_____	_____
HCV	_____	_____

BIO-CHEMISTRY		
TEST	RESULT	NORMAL
Blood Sugar Fasting	<u>70</u> mg%	70 - 110
Blood Sugar Random	<u>70</u> mg%	70 - 160
Bilirubin Total	<u>0.1</u> mg%	0 - 1.0
Bilirubin Direct	<u>0.3</u> mg%	0.3
Bilirubin Indirect	<u>0.0</u> mg%	0.0 - 0.7
SGPT (ALT)	<u>20</u> iu/ml	20 - 40
ALK Phos Adult	<u>90</u> u/l	9.0 - 35.0
ALK Phos Child	<u>35</u> u/l	35 - 100
Blood Urea	<u>20</u> mg%	20 - 40
S. Creatinine	<u>0.6</u> mg%	0.6 - 1.5
Uric Acid Male	<u>3.5</u> mg%	3.5 - 7.5
Uric Acid Female	<u>2.5</u> mg%	2.5 - 6.0
Cholesterol	<u>150</u> iu/dl	150 - 200
Signature _____		
Add: Standard X-Ray Clinic		

(A)
 (B)

(10) Annex - "C"

12



To

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

☎ 091-9210334, 9210406 📠 091-9213445

No. 30980 1.

Dated 16-12-2014 1.

The Superintendent,
Headquarters Prison D.I.Khan.

Subject:- DEPARTMENTAL APPEAL
Memo:

I am directed to refer to your letter No.12482-WE dated 20-11-2014 on the subject and to convey that departmental appeal in respect of Mr.Zia Ullah Ex-warder for set asiding the penalty of termination from service has been considered and decision of competent authority uphold by the appellate authority (I.G) being probationer.

Please inform him accordingly.

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



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

In the matter of
Service Appeal No.1420/2014
Zia Ullah Ex-Warder
Attached to District Jail Karak.....**Appellant.**

VERSUS

1. Secretary to Government of Khyber Pakhtunkhwa,
Home and T.As Department.
2. Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar.
3. Superintendent
District Jail Karak.
4. Superintendent
Circle Headquarters Prison D.I Khan**Respondents.**

PARAWISE REPLY ON BEHALF OF RESPONDENTS No. 1 to 4.

Preliminary Objections

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

ON FACTS

- 1- Pertains to record, hence no comments.
- 2- In-correct. The appellant was in probation period and he committed serious offence of willful absence. According to the terms and conditions of his offer of appointment is very clear and the competent authority passed order strictly in accordance with the rules. A civil servant can be terminated from service, if his conduct is un-satisfactory during the period of his probation **(Annex-A)**.
- 3- His departmental appeal was considered and rejected by the competent authority vide Inspector General of Prisons letter No.30980 dated, 16/12/2014 copy enclosed as **(Annex-B)**, after affording the opportunity of personal hearing.

4- No comments.


GROUND: -


- A. The termination orders of the competent authority is strictly in accordance with rules and tenable in the eyes of law and terms & condition of his offer of appointment.
- B. Same remarks as given against Para-A above.
- C. Same remarks as given against Para-2 above.
- D. In-correct, during the course of consideration of his departmental appeal, the opportunity of personal hearing to the accused official / petitioner was provided as evident from **(Annex-C)**.
- E. The Prisons services is very sensitive and the willful absence of Watch & Ward Staff including the petitioner may advantage to the militants to attack on the Jail like, Bannu & D.I.Khan Jails incidents which cannot tolerable at any cost in the interest of state. The appellant committed grave misconduct on his part by willfully absented himself from duty as well as Jail premises in view of security threat to the Jail and showing laxity in responsibility. He deserted and left the security of the Jail on the mercy of Almighty Allah.
- F. The relevant rules as well as terms & condition of his offer of appointment is very clear and the competent authority passed order strictly in accordance with the rules.
- G. In-correct, no malafide intention is involved and the action taken against the appellant is just to maintain discipline amongst the force.
- H. The desertion of the petitioner from the official duty as well as Jail premises, the security of the Jail become at stake and may afford full advantage to any terrorist attack on the Jail. As the appellant

committed grave misconduct on his part, due to which the appellant did not deserve for any leniency and the termination is strictly in accordance with the rules and for opener of eyes of others for maintaining discipline amongst the staff and to ensure the security of the Jail.


1. He was properly heard during the course of his appeal by the appellate authority but he failed to justify his willful absence from duty as well as Jail premises.

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


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


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


SUPERINTENDENT
DISTRICT JAIL KARAK
(Respondent No.3)


SUPERINTENDENT
CIRCLE HEADQUARTER'S PRISON
D.I KHAN
(Respondent No.4)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR


In the matter of
Service Appeal No.1420/2014
Zia Ullah Ex-Warder
Attached to District Jail Karak.....**Appellant.**

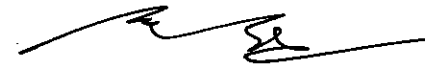
VERSUS

1. Secretary to Government of Khyber Pakhtunkhwa,
Home and T.As Department.
2. Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar.
3. Superintendent
District Jail Karak.
4. Superintendent
Circle Headquarters Prison D.I Khan**Respondents.**

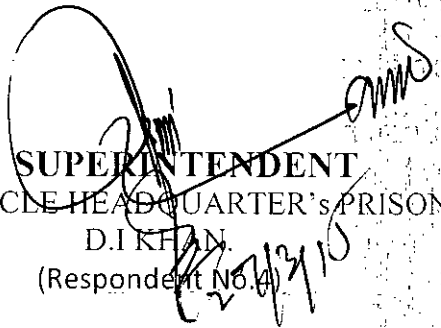
COUNTER AFFIDAVIT ON BEHALF OF RESPONDENTS No. 1 to 4

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


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


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


SUPERINTENDENT
DISTRICT JAIL KARAK
(Respondent No.3)


SUPERINTENDENT
CIRCLE HEADQUARTER'S PRISON
D.I KHAN
(Respondent No.4)

Annex - A

10 MAY 2015 3:25:41 PM



10 MAY 2015 3:25:41 PM
ANNEX - A
2015

Other

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3

Annex-B

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

☎ 091-9210334, 9210406 🏠 091-9213445

No. 30980 / 1.,

Dated 16-12-2014 / 1.,



To
The Superintendent,
Headquarters Prison D.I.Khan.

Subject:- DEPARTMENTAL APPEAL

Memo:
I am directed to refer to your letter No.12482-WE dated 20-11-2014 on the subject and to convey that departmental appeal in respect of Mr.Zia Ullah Ex-warder for set asiding the penalty of termination from service has been considered and decision of competent authority uphold by the appellate authority (I.G) being probationer.
Please inform him accordingly.

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

DS/PB -

19/12/14
4078
19.12.2014.

Annex-C

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

091-9210334, 9210406 091-9213445

NO. Estab/Appeal-Draft 29354-1

Dated 28/11/2014

MOST IMMEDIATE / BY FAX

The Superintendent
Circle Headquarter Prison D.I.Khan.

DEPARTMENTAL APPEAL.

Subject: -
Memo;

I am directed to refer to your letter No.12482/WE dated 20-11-2014 on the subject and to ask you to direct Mr. Ziaullah Ex-Warder to attend this office on 15-12-2014 at 11000 AM positively for personal hearing before the Worthy Inspector General.

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

Endst; No. _____/-

Copy of the above is forwarded to the PA to Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information.

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

[Handwritten notes]
EYS/PA
PA inform and arrange

[Large handwritten signature]

3768
21-12-2014



Pi Y.S.


NO. 1204

MOST IMMEDIATE / BY FAX
OUT TODAY

To, The Superintendent,
District Jail Karak.


Subject: **DEPARTMENTAL APPEAL.**

Memo: Please inform EX-warder Ziaullah on his home address to attend the office of Inspector General of Prison Khyber Pakhtunkhwa Peshawar on 15-12-2014 at 11-00 AM for personal hearing.


SUPERINTENDENT
CIRCLE H/QS PRISON DIKHAN
12/12/14

ENDST NO: 12832 DATED 08 /12/2014

Copy of the above is forwarded to the Inspector General of Prison Khyber Pakhtunkhwa Peshawar for information with reference to his memo; No.29354 dated 28-11-2014 please.


SUPERINTENDENT
CIRCLE H/QS PRISON DIKHAN
12/12/14

By FAX

OFFICE OF THE
SUPERINTENDENT
DISTRICT JAIL KARAK
NO. 1350
DATED. 14/10/2014

TEL&FAX: 0927-210537

To

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

Subject:- ABSENT OF WARDER ZIA ULLAH

Memo:-

It is submitted that Warder Zia Ullah attached to this jail has again absented himself from duty and line w.e.f 13-10-2014 and still at large. Early before this, he absented himself from jail line and duty w.e.f 04-10-2014 to 07-10-2014. He is in probation period. He is habitual and not interesting in performance of his duties. His date of appointment is 17-05-2013.

It is therefore recommended that keeping in view his probation period and unsatisfactory performance, he may be terminated from service with immediate effect for the opener of others eyes please.

~~_____
SUPERINTENDENT
DISTRICT JAIL KARAK~~

PB.

yes


14/10/2014

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

NO. 26855 *WB*

DATED 31/10/2014

Regd

To

The Superintendent,
Headquarters Prison D.I.Khan.

Subject:- DEPARTMENTAL APPEAL
Memo:

I am directed to refer to the subject and to forward herewith a copy of appeal submitted by Mr. Zia Ullah Ex- warden, on the captioned subject (self explanatory) for information.

Please look into the matter and furnish your necessary comments on annotated form alongwith inquiry report, charge sheet, Show Cause Notice and history of his service on the below noted format within two days positively for further necessary action by this office:-

S.No.	Name & Parentage	Rank	Date of Birth	Date of appointment.	Punishment awarded during his entire service with date and nature of offence

[Signature]
ASSISTANT DIRECTOR (ADMN)
FOR INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR.

2631
11/11/2014

PB
[Signature]
11/11/14

حضرت جناب انس اللہ رضی اللہ عنہما جلیل القدر صاحبِ جلال و کبریا
فہرہ فہرہ خواہ لہ

عنوان اپیل

جناب عالی!

22/10/14

مذکورہ نذرانہ ہے کہ سائیل ایک زیر سایہ جھیت وادوڑ
ڈسٹرکٹ جیل ٹرک میں ڈیوٹی سرانجام دے رہا تھا۔ دوران نذرانہ
افسردان بالا کو کبھی بھی شہادت کا موقع نہیں دیا۔

جناب عالی! دوران ڈیوٹی مورخہ 2014-10-11 کو میری طبیعت
اچانک خراب ہوئی اور میں گاڑی چلا گیا کیونکہ میرے پاس علاج
کے لئے کوئی تھ نہیں۔ وہاں جا کر ہسپتال کا رخ کیا اور میرے کل
امسٹر ڈی ایچ ہسپتال ہنگو نے میرے ٹیسٹ وغیرہ کرائے پھر 03
دن کے لئے ریسیٹ دیا جو کہ درخواست کے ساتھ لف ہے۔ تین دن نذرانے
کے بعد جیل میں جیل پہنچا تو مجھے پتہ چلا کہ مجھے نوٹری سے برخاست
کیا گیا ہے۔ جبکہ فوٹو کاپی لف ہے۔

جناب عالی سے مدد درانہ اپیل کی جاتی کہ سائیل کو نوٹری سے دوبارہ
بحال کیا جائے کیونکہ مجھے نہ تو کوئی شواہد ملے اور نہ مجھے بولنے
کا موقع دیا گیا۔ جناب عالی میرا ساتھ ساتھ سر اسر زیادتی ہوئی ہے۔ کوئی
رنوٹری نہیں دعوی ہے۔

سائیل تادم زلیست عاٹوہ رہے گا۔
عرفیہ
22/10/2014

آپ کا فرمان بردار سابقہ وادوڑ جناب اللہ ولد عبدالعزیز خان
محل باغ کلمہ حصہ و ضلع بنکو

Mob: 0336-9399355

24/10/14

OFFICE OF THE
SUPERINTENDENT
DISTRICT JAIL KARAK
NO. 1510

OFFICE OF THE
SUPERINTENDENT
DISTRICT JAIL KARAK
NO. 1510
DATED. 12/11/2014

By Fax

TEL&FAX: 0927-210537

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

Subject:- DEPARTMENTAL APPEAL.

Memo:- Reference your office memo No. 12264 dated 11-11-2014 on
the above subject.

The requisite information in respect of Ex-warder
Mr. Zia Ullah on the prescribed format is furnished as under:-

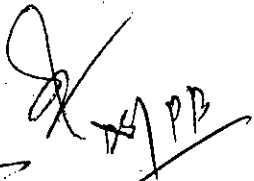
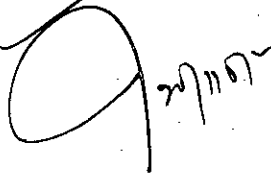
S#	Name & Parentage	Rank	Date of Birth	Date of Appointment	Punishment awarded during his entire service with date and nature of office.
1	Zia Ullah S/o Abbas Khan	Warder (BPS-5)	09.03.1991	17.05.2013	1) On 21.10.2014 he has been terminated from his service due to unsatisfactory performance being Probationer vide Superintendent Headquarter Prison D.I Khan Order No.11561-64 dated 14.10.2014.

Submitted for information please.

Endst No :- _____ Dated ___/11/2014


SUPERINTENDENT
DISTRICT JAIL KARAK

Copy of the above is forwarded to the Inspector General of
Prisons Khyber Pakhtunkhwa Peshawar for information please.

3697
26-11-2014




SUPERINTENDENT
DISTRICT JAIL KARAK

OFFICE OF THE
SUPERINTENDENT
CIRCLE H/Qs PRISON D.I.KHAN
No. 12482/42/HQ Dt; 20-11-2014

P.B

PKP

The Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar.

Subject: **DEPARTMENTAL APPEAL**
Memo:

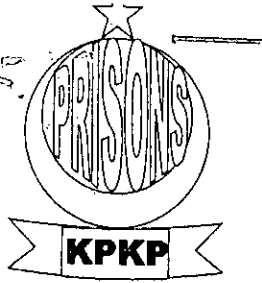
Reference this office Endst No. No.12265 dated 11-11-14 on the subject.

The information required in your office memo No. 26855 dated 31.10.2014 has provided by the Superintendent Jail Karak vide his Memo No 1510 dated 17.11.2014 (Photocopy enclosed).

The Ex-Warder Zia Ullah S/o Abbas Khan terminated by this Headquartered vide Superintendent Circle Headquarter DIKhan Endst: No. 11569-71 dated 14.10.2014 copy enclosed on the basis of recommendation of the Superintendent District Jail Karak due to absented himself from duty and line w.e.f 13.10.2014 and still at large and also remain absent from line and duty from 04.10.2014 to 07.10.2014 being habitual and non interesting of performing of his duty, being probationer and unsatisfactory performance vide Superintendent District Jail Karak memo No. 1350 dated 14.10.2014(Photocopy enclosed).

Submitted please.

ol
SUPERINTENDENT
CIRCLE H/Qs PRISON DIKHAN
20/11/14



22

OFFICE OF THE
SUPERINTENDENT
CIRCLE H/Qs PRISON D.I.KHAN
No. 13246 /HQ Dt; 23-12-14
PH&FAX NO.0966-9280299
Centraljail_dikhan@yahoo.com

To

The Superintendent,
District Jail Karak.

Subject:- DEPARTMENTAL APPEAL

Memo;

The appeal of the of Mr. Zia Ullah EX-Warder attached to your jail for set
asiding the penalty of termination of service has been considered and decision of
competent authority uphold by the appellate authority (IG) being probationer .

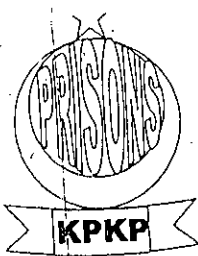
Please inform him accordingly.

SUPERINTENDENT
CIRCLE H/Qs PRISON DIKHAN

ENDST NO: 13247 DATED 23 /12/2014.

Copy of the above is forwarded to the Worthy Inspector General of Prisons
Khyber Pakhtunkhwa, Peshawar for information with reference to his memo No. 30928
dated 16.12.2014 please.

SUPERINTENDENT
CIRCLE H/Qs PRISON DIKHAN



OFFICE OF THE
SUPERINTENDENT
CIRCLE H/Qs PRISON D.I.KHAN
No. _____/HQ Dt; _____

OFFICE ORDER

As recommended by the Superintendent District Jail Karak vide his memo No.1350 dated 14-10-2012 newly recruited Warder Zia Ullah attached to District Jail Karak absented himself from duty and line with effect from on 13-10-2014 and his work & conduct is un-satisfactory, therefore, the above named temporary warder is hereby **TERMINATED** from service with immediate effect being PROBATIONER.

His date of appointment is 17-5-2013

SUPERINTENDENT
CIRCLE H/Qs PRISON DIKHAN

No. 11561-64 Dated 14/10/2014
Copy of the above is forwarded to the:-

1. Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar for information with reference to above please.
2. Superintendent Headquarter Prison Peshawar for information.
3. Superintendent District Jail Karak for information w/r to above.
4. District Accounts Officer Karak for information and necessary action.

[Signature]
SUPERINTENDENT
CIRCLE H/Qs PRISON DIKHAN
14/10/14

No 733
21/10/14

DS 20 HQ
Zia Ullah
as per order.
[Signature]
21/10/14

DOOR PATIENT'S TICKET

Institution:

District:

Yearly OPD No. 1992

Name: 4/11/1992
Father's/Husband's Name: _____
Age: _____ Sex: _____ Address: _____
Health Problem / Diagnosis: _____
Patient Seen By: _____

Date(s) History / Clinical Findings / Action Taken

M.P. 10/11/92
Widely
① Test noridel samp (+)
② Test 20 p 5 u - DS
3 sup- Complex + L
Adv: Complete Bed rest for 2-2
three days

OFFICIAL OFFICER
HOSPITAL
LANGU
SUPERINTENDENT
CIRCLE HQS PRISON DIKHAN
14/10/14

HC
Vila
10/10/14

