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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Service Appeal NO: 883/2022

**Mohsin Anees Ex-Warder Central Prison Haripur.....(APPELLANT)
VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Home and Tribal Affairs to Peshawar.
2. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director Inspectorate General of Prisons Khyber Pakhtunkhwa, Peshawar.
4. Superintendent Circle HQ Prison Haripur.
5. Superintendent Sub Jail Dasu District Kohistan..... (RESPONDENTS)

INDEX

<u>Sr. No</u>	<u>Description of Documents</u>	<u>Annexure</u>	<u>Page No</u>
1	Joint para-wise Comments		1-2
2	Counter Affidavit		3
3	Khyber Pakhtunkhwa Prison Rules 1082 and 1083.	<u>Annex-A</u>	4-5
4	Show Cause Notice	<u>Annex-B</u>	6
5	Removal/Impugned order 29-03-2022	<u>Annex-C</u>	7
6	Departmental Appeal	<u>Annex-D</u>	8-10
7	Personal Hearing	<u>Annex-E</u>	11
8	Other documents		12-16

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

In the matter of

Service Appeal NO: 883/2022

Mohsin Anees Ex-Warder Central Prison Haripur.....(APPELLANT)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home and Tribal Affairs to Peshawar.
2. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director Inspectorate General of Prisons Khyber Pakhtunkhwa, Peshawar.
4. Superintendent Circle HQ Prison Haripur.
5. Superintendent Sub Jail Dasu District Kohistan..... **(RESPONDENTS)**

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO:1 to 5

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 stopped 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. Petains to record hence needs no comments.
2. Admitted to the extent that the appellant served in prison department. The appellant does not applied for leave nor he had admitted the leave. The appellant does not follow the Khyber Pakhtunkhwa, Prison Rules 1082 and 1083. There is no rules for verbal/oral leave. **(Copy of Rules is attached as Annex-A).**

3. Correct and admitted. Copy of Show Cause Notice is attached as “Annex-B”.
4. Incorrect and not admitted. That the appellant does not submitted reply to the show cause notice issued by the competent authority. (Copy of impugned order dated 29-03-2022 is “Annex-C”).
5. Correct and admitted. That the appellant filed departmental appeal against the impugned removal order which was rejected by the competent authority. Copy attached as “Annex D”.
6. Incorrect and not admitted. That the appellant time and again absent himself from duty and line without the permission of competent authority, he remained absent from duty and line w.e.f 09-12-2021 to 28-12-2021 and 01-01-2022 to 31-01-2022 (51 days) without the permission of competent authority. Show Cause notice is attached as “Annex-B”.

OBJECTION ON GROUNDS:

- A. Incorrect and not admitted. That the appellant was proceeded under Rule-3 of Khyber Pakhtunkhwa, Government Servants (Efficiency and Discipline) Rule, 2011 amended in 2021 for the charges of his misconduct as mentioned in the show cause notice. The competent authority grant him the opportunity of personal hearing on 22-03-2022 but his reply was unsatisfactory. (Copy attached as “Annex-E). The competent authority in exercise of power conferred Rule-14(5) of Khyber Pakhtunkhwa, Government Servents (Efficiency and Discipline) Rule 2011 amended in 2021, having consider the charges, evidence on record and reports submitted by Superintendent Central Prison Haripur, except this instant case, an another report submitted by Superintendent Central Prison Haripur regarding his absent from duty w.e.f 11-02-2022 to 14-02-2022 (04 days) and 18-02-2022 to 29-03-2022 (39 days), non-serious in performance of assigned duties, his previous poor record wherein he remained absent from duty w.e.f 06-03-2021 to 04-04-2021 (29 days) and w.e.f 26-04-202 to 16-06-2021 (50 days), the competent authority award him major punishment of “Removal from Service”. Removal order attached /impugned order is attached. Total absence period 173 days in 2 year service.
- B. Incorrect and not admitted. Show cause notice had been served upon the appellant for his misconduct and the principle of Audi Altrum partum is applied and the opportunity of personal hearing is provided to the appellant but his reply was unsatisfactory. Copy of personal hearing is attached as “Annex-E”.
- C. Incorrect and not admitted.
- D. Incorrect and not admitted. That the appellant time and again absent himself from duty without the permission of competent authority, despite the seriousness of his job nature. The answers has been given in “para-a” above.


E. Incorrect and not admitted. That the appellant was proceeded under Rule-3 of Khyber Pakhtunkhwa, Government Servants (Efficiency and Discipline) Rules, 2011 amended in 2021 for the charges of his misconduct. The competent authority awarded major punishment "Removal from Service" to the appellant after completing all the codal formalities.


F. ~~Subject To proof and list of Para, The punishment awarded to appellant is~~
 G. ~~According to Law and rules.~~

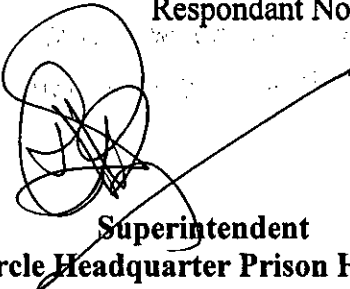
H. ~~That due to conduct of appellant all codal formalities are full filled.~~
 H. As explained in paras above.

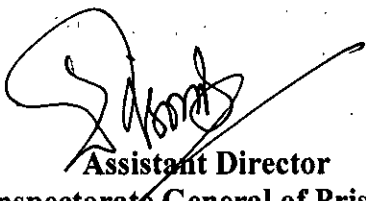
PRAYER :

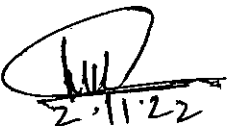
It is humbly prayed that upon acceptance of the above submission of joint parawise comments on behalf of respondents No. 1 to 5, the appeal of the appellant may graciously be dismissed being devoid of merit and against the law.


 Secretary Home & Tribal Affairs Department
 Khyber Pakhtunkhwa, Peshawar
 Respondant No. 1


 Inspector General Of Prisons
 Khyber Pakhtunkhwa, Peshawar
 Respondant No. 2


 Superintendent
 Circle Headquarter Prison Haripur
 Respondant No. 4


 Assistant Director
 Inspectorate General of Prisons
 Khyber Pakhtunkhwa Peshawar
 Respondant No. 3


 2.11.22
 Superintendent
 Sub Jail Dasu Kohistan
 Respondant No. 5

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**


Service Appeal NO: 883/2022


**Mohsin Anees Ex-Warder Central Prison Haripur.....(APPELLANT)
VERSUS**

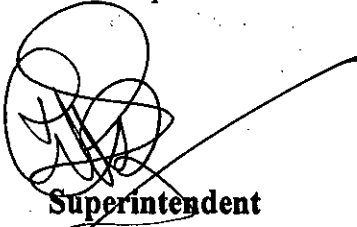
1. Government of Khyber Pakhtunkhwa through Secretary Home and Tribal Affairs to Peshawar.
2. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director Inspectorate General of Prisons Khyber Pakhtunkhwa, Peshawar.
4. Superintendent Circle HQ Prison Haripur.
5. Superintendent Sub Jail Dasu District Kohistan..... (RESPONDENTS)


**COUNTER AFFIDAVIT ON BEHALF OF RESPONDENTS NO. 1
to 5.**

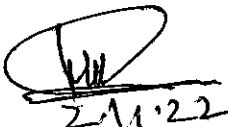
We the undersigned respondents do hereby solemnly affirm and declare that the contents of the Joint para-wise Comments in the above cited appeal are true and correct to the best of our knowledge and belief and that no material facts have been concealed from this Honourable Service Tribunal.


**Secretary Home & Tribal Affairs Department
Khyber Pakhtunkhwa, Peshawar
Respondant No. 1**


**Inspector General Of Prisons
Khyber Pakhtunkhwa, Peshawar
Respondant No. 2**


**Superintendent
Circle Headquarter Prison Haripur
Respondant No. 4**


**Assistant Director
Inspectorate General of Prisons
Khyber Pakhtunkhwa Peshawar
Respondant No. 3**


**Superintendent
Sub Jail Dasu Kohistan
Respondant No. 5**

4

1

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT.**

NOTIFICATION

Peshawar, dated the 14th March 2018.

No.SO(P&R)HD/3-3/2018.-In exercise of the powers conferred by section 59 of the Prisons Act, 1894 (IX of 1894) and in supersession of rules issued in this behalf, the Government of the Khyber Pakhtunkhwa is pleased to make the following rules, namely:

**THE KHYBER PAKHTUNKHWA
PRISONS RULES, 2018.**

**Chapter-1
General Provision**

1. Short title and commencement.---(1) These rules may be called the Khyber Pakhtunkhwa Prisons Rules, 2018.

(2) It shall come into force at once.

2. Definitions.---(1) In these rules, unless otherwise prescribed the following expressions shall have the meaning hereby respectively assigned to them, that is to say-

- (a) "Act" means the Prisons Act, 1894 (Act IX of 1894);
- (b) "Additional Inspector General" means Additional Inspector General of Prisons appointed by Government under these rules;
- (c) "Assistant Superintendent" means Assistant Superintendent of the Prisons and includes Senior Assistant Superintendent or Senior Lady Assistant Superintendent appointed by Government;
- (d) "Central Prison" means a Central Prison declared as such by Government;
- (e) "Chief Warder" means Chief Warder either male or female, as the case may be, in respective ward in a Prison;
- (f) "Code" means the Code of Criminal Procedure, 1898 (V of 1898);

5

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 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.

**SHOW CAUSE NOTICE UNDER RULE-5 (i) (a) READ WITH RULE-7 OF THE
KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY &
DISCIPLINE) RULES, 2011.**

I, Muhammad Hamid, Superintendent Circle Headquarters Prison Haripur as
competent authority do hereby charge you following Warders attached to Central Prison
Haripur as follows:-

S.#	Name	Desig	Faults
01	Adnan	Warder	You remained absent from duty and lines w.e.f 11-12-2021 to 21-12-2021 (11 days) without the permission of competent authority.
02	Muhammad Arshad	Warder	You remained absent from duty and lines w.e.f 16-12-2021 to 22-12-2021 (07 days) without the permission of competent authority.
03	Mohsin Anees	Warder	You remained absent from duty and lines w.e.f 09-12-2021 to 28-12-2021 & 01-01-2022 to 31-01-2022 (51 days) without the permission of competent authority.
04	Ibrahim	Warder	You remained absent from duty and lines w.e.f 21-12-2021 to 28-12-2021 (08 days) without the permission of competent authority.
05	Muhammad Waleed	Warder	You remained absent from duty and lines w.e.f 24-12-2021 to 30-12-2021 (07 days) without the permission of competent authority.
06	Ghulam Mujtaba	Warder	You remained absent from duty and lines w.e.f 24-12-2021 to 02-01-2022 (10 days) without the permission of competent authority.
07	Shahid Iqbal	Warder	You remained absent from duty and lines w.e.f 20-01-2022 to 31-01-2022 (11 days) without the permission of competent authority.

Your this practice is a grave misconduct on your part & entails you for strict disciplinary action under the E & D Rules-2011.

I, Muhammad Hamid, Superintendent Circle Headquarters Prison Haripur as competent authority, am satisfied by the report submitted by Superintendent District Jail Mansehra & there is no need of holding any further inquiry.

Now therefore, you above named accused Warders are hereby called upon to show cause within seven (07) days as to why admissible Minor or Major Punishment may not be awarded to you for your above stated act of misconduct.

SUPERINTENDENT
CIRCLE HQS PRISON HARIPUR

Endst: No. 779-86 Dated: 1/1/2022

- 1) The Superintendent, Central Jail Haripur for information w/h to INO: 823 Dated: 04-02-2022, Moreover their reply may be sent to this office before personal hearing for further perusal please.
- 2) Accused Warders attached to Central Prison Haripur for information and reply in feedback.

SUPERINTENDENT
CIRCLE HQS PRISON HARIPUR



OFFICE ORDER:

WHEREAS, Accused Mohsin Anees S/o Muhammad Anees Warder (BPS-07) attached to Central Prison Haripur was proceeded against, under Rules-3 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 amended in 2021 for the charges of his misconduct as mentioned in the Show cause Notice served upon him.

WHEREAS, he furnished his reply, which was found unsatisfactory.

AND WHEREAS, the undersigned being the competent authority granted him the opportunity of personal hearing on 22-03-2022 as provided for under rules ibid. Moreover, he didn't appear before undersigned and not complied the orders of this office.

NOW THEREFORE, in exercise of powers conferred under Rule-14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011 amended in 2021, having considered the charges, evidence on record & Reports submitted by Superintendent Central Prison Haripur, except this instant case, an another report submitted by Superintendent Central Prison Haripur regarding his absent from duty w.e.f 11-02-2022 to 14-02-2022 (04 days) and 18-02-2022 to till date i.e 29-03-2022 (39 days), non-serious in performance of assigned duties, his previous track record wherein he remained absent from duty w.e.f 06-03-2021 to 04-04-2021 (29 days) & w.e.f 26-04-2021 to 16-06-2021 (50 days), undersigned being the competent authority awarded Major Punishment of "Removal From Service" to Mohsin Anees S/o Muhammad Anees Warder (BPS-07) attached to Central Prison Haripur with immediate effect.

Further, his absence period w.e.f 09-12-2021 to 28-12-2021 & 01-01-2021 to 31-01-2022 (51 days) & w.e.f 11-02-2022 to 14-02-2022 (04 days) and 18-02-2022 to till date i.e 29-03-2022 (39 days) will be treated as Extra Ordinary Leave Without Pay.

Note: his total absence is 173 days.

M. A. 29/3/2022
SUPERINTENDENT
CIRCLE H.Q. PRISON HARIPUR.

Endst: No: 1758-62

Copy of the above is forwarded to:

- 1) The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
- 2) The Superintendent Central Prison Haripur for information, w/r to the No: 873 dated: 04-02-2022 please.
- 4) The DAO Haripur for information and necessary action please.
- 5) The Private Secretary to Special Assistant to Chief Minister for Prisons Khyber Pakhtunkhwa Peshawar for information please.
- 6) Mohsin Anees S/o Muhammad Anees Warder (BPS-07) attached to Central Prison Haripur c/o Superintendent Central Prison Haripur at home address for information please.

M. A. 29/3/2022
SUPERINTENDENT
CIRCLE H.Q. PRISON HARIPUR



INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

91-9210334, 9210406

91-9213445

No. Estb/Ward/Orders/ 15923

Dated 18-05-2022

ORDER:

WHEREAS, Ex-Warder Mohsin Anees S/O Muhammad Anees while posted at Central Prison Haripur was awarded the major penalty of "Removal from Service" and "his absence period w.e.f 09-12-2021 to 28-12-2021, from 01-01-2021 to 31-01-2022, from 11-02-2022 to 14-02-2022, from 18-02-2022 to 29-03-2022 treated as extra ordinary leave without pay" by the Superintendent Headquarters Prison Haripur vide his office order No. 1757 dated 29-03-2022 due to his long willful absence quoted above.

AND WHEREAS, the said Ex-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.

AND WHEREAS, he was afforded an opportunity of personal hearing on 13-05-2022. During the course of hearing, he explained his position but failed to prove and justify his innocence.

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 Superintendent Headquarter Prison Haripur is upheld and appeal of the appellant is hereby rejected being without any substance.

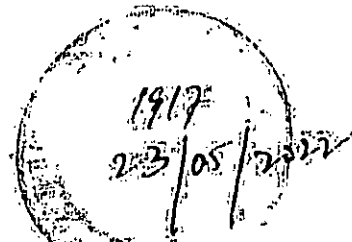
INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.

Endst; No. 15924-2A

Copy of the above is forwarded to:

1. The Superintendent Headquarters Prison Haripur for information and necessary action with reference to his letter No. 2261/WE dated 28-04-2022.
2. Superintendent Central Prison Haripur for information and necessary action. He is directed to inform the appellant accordingly and make necessary entry in his Service Book under proper attestation.
3. The District Accounts officer concerned for information and necessary action.
4. Appellant concerned C/O Superintendent Central Prison Haripur for information.

Assistant Director
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



23/05/2022

SEARCHED	SERIALIZED
INDEXED	FILED

ڈاکٹر منظور احمد صاحب سیکریٹری جنرل آف بولیس جیل خانہ جات خیدر پور ضلع لاہور

درج ذیل مسائل / اپیلیں بنیاد راجھی مندرجہ ذیل صاحب سپرنٹنڈنٹ صاحب
 1757-1758-62 جس میں پوری طور حکومت نے 29-3-2022ء میں کے وقت مسائل کو سروس سے
 خیر جاہزی کی بنا پر Remove کیا گیا ہے جو کہ مسائل کا موقف
 کو درست طور پر تسلیم نہیں کیا گیا ہے جو کہ سروس زیادتی نالافتائی
 سے مسائل کے ختم ہونے کی اگلی کارروائی نامناسب ہے مسائل کو سروس میں
 بحال کیا جائے انصاف کے تقاضے پورے کیے جائیں کہ درج ذیل سروس میں
 رہنے کا وضع فی الزم بنا جائے مسائل سے ختم ہونے کے بعد
 گما کر ڈر 29.3.22ء کو منسوخ فرمایا جائے اور نیکر جاری کیے احکامات مار ڈالنے کے

جناب عالی اپیل ذیل عرض ہے

1۔ یہ کہ مسائل کی عمر ہر ڈھائی سال سروس تو چھٹی ہے کہ مسائل نے اس
 عمر میں بھی ایسے افسران ملد جو سفارتی کا وضع فی الزم نہیں بنا سکتا

2۔ یہ کہ مسائل کو قصداً واسو میں بطور وارڈ ڈیوٹی سروس انجام دے رہے ہیں اس
 دوران مسائل سے ملا صاحب کمروں کی بجاری میں مشدد ہونگے آہستہ
 حتمی میں داخل کیا گیا اور گھوڑوں میں دیگر کوئی مرد و بالغ صاحب کی دیکھو ہاں علاج
 حاصل کیے جو جو دن تھا اور مسائل نے جناب سپرنٹنڈنٹ صاحب واسو کوستان کو
 چھٹی گئے 4/7 درج ذیل میں کہیں مسائل پورے وقت نہ دیا گئے جس میں مسائل
 کے والد صاحب کے علاج صحیح ہے DHA میں 25/25 دن دسم گورنر آئین
 گورنر صاحب کو والد کی خدمت گورنر کو فعال کرنا ہے

3۔ یہ کہ مسائل سے والد صاحب کی صحت نامی کے کبھی والین واسو پور پور صاحب کی گورنر
 سپرنٹنڈنٹ صاحب کو اپنے والد صاحب کا بیمار کے علاج کے فائدہ
 وغیرہ دیکھنے کے کہ ایسی ساری چیزیں ہیں جن کی سائز سے جان بوجھ کر
 ڈیوٹی سے خیر جاہزی نہیں کیا گیا اور گورنر کوستان 25/25 دن دسم گورنر آئین
 4۔ یہ کہ مسائل سے قبل مسائل صاحب ایسٹ کماؤر سپرنٹنڈنٹ جیل میں ڈیوٹی سروس
 کرتے تھے مسائل نے DHA میں ایسٹ کماؤر سپرنٹنڈنٹ جیل میں ڈیوٹی سروس
 کی تھی جس کے بعد مسائل نے ایسٹ کماؤر سپرنٹنڈنٹ جیل میں ڈیوٹی سروس
 کی تھی جس کے بعد مسائل نے ایسٹ کماؤر سپرنٹنڈنٹ جیل میں ڈیوٹی سروس



OFFICE OF THE SUPERINTENDENT
CIRCLE (EASTERN) HQs PRISON HARIPUR
No. 1658 - 1 - Date 21/03/2022
Phone/Fax: 0995-920066

To
The Superintendent,
Central Prison Haripur,
Subject:- PERSONAL HEARING.
Memo:

Following accused Warders (BPS-07) attached to your Jail may be directed to attend the office of undersigned on Tuesday 22-03-2022 (from Sr No:1 to Sr. No:10) & on Thursday 24-03-2022 (from Sr. No:11 to Sr. No:17) for Personal Hearing at 10.00AM positively:-

- | | |
|---------------------------------|---|
| EDL -1) Adnan | 2) M. Arshad - <i>Arshad</i> |
| ✓3) Mohsin Anees | 4) Ibrahim - <i>Ed</i> |
| <i>100% EDL</i> 5) M. Waleed | 6) Ghulam Mujtaba - <i>one present + Ed (Khatir khatir)</i> |
| 7) Shahid Iqbal | 8) Imran Hussain Shah |
| <i>EDL</i> 9) Haroon Ur-Rasheed | ✓10) Sajjad-Ahmed |
| <i>EDL</i> 11) Fazal Khaliq | 12) M. Zahid - <i>02 presents</i> |
| 13) Saleem Ul-Haq - <i>EDL</i> | 14) Arsalan Mushtaq - <i>EDL</i> |
| 15) Hussain Ahmed - <i>EDL</i> | 16) Sajjad Khan - <i>EDL</i> |
| 17) Bakht Baidar - <i>EDL</i> | |

Moreover, they may directed to appear in proper uniform and their service books may also be endorsed please.

02
SUPERINTENDENT
CIRCLE H.Q. PRISON HARIPUR
Srb



**INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

091-9210334, 9210406

091-9213445

<https://www.facebook.com/kpkprisons>
prisonslg@gmail.com

No: 14169

Dated: 26 - 04 - 2022

To,

The Superintendent,
Circle Headquarters Prison Haripur

Subject: **DEPARTMENTAL APPEAL**

Memo:

I am directed to refer to the subject and to forward herewith a copy of departmental appeal dated 20-04-2022 alongwith its enclosure (self-explanatory) submitted by Ex-Wardee Mohsin Anees S/o Muhammad Anees attached to Central Prison Haripur on the captioned subject for information and necessary action.

Please look into the matter and furnish your necessary views/comments alongwith history of his service on the below noted format for further necessary action by this office:

S.No.	Name & Parentage	Rank	Date of Birth	Date of appointment.	Detail Of Postings	Penalty if any awarded.
-------	------------------	------	---------------	----------------------	--------------------	-------------------------

[Signature]
ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

[Signature]
PB

[Signature]
28/04/2022





OFFICE OF THE SUPERINTENDENT
CIRCLE (EASTERN) HQS PRISON HARIPUR

No. 2261-WE/1-
Dated 28/04/2022-1-
Phone/Fax: 0995-920066

To,
The Inspector General of Prisons,
Khyber-Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL

Respected Sir:

Kindly Reference to the No. 14169/WE dated 26-04-2022.

The requisite information pertaining to appeal of Mr. Mohsin Anees S/o Muhammad Anees Ex-Warder (BPS-07) attached to Central Prison Haripur is furnished as under on the prescribed format for further necessary action please:-

S#	Name & Parentage	Rank	D.O.B	Date of Appointment	Detail of Postings	Penalty if any awarded
01	Mohsin Anees S/o Muhammad Anees	Warder (BPS-07)	06-08-1999	04-10-2019	1. CP Haripur w.e.f 04-10-2019 to 14-01-2020. 2. DJ Abbottabad w.e.f 14-01-2020 to 08-07-2021. 3. SJ Dassu Kohistan w.e.f 05-03-2021 to 08-07-2021. 3. CP Haripur w.e.f 08-07-2021 to till date of "Removal from Service" i.e 29-03-2022.	1. Awarded minor Punishment of "Censure" due to absence of 05 days w.e.f 11-09-2020 to 14-09-2020 vide this office No. 3220-21 dated 05-08-2020. 2. Awarded minor Punishment of "Censure" due to absence of 12 days w.e.f 04-08-2020 to 16-08-2020 vide this office No. 2935-40 dated 22-07-2020. 3. Awarded minor Punishment of "Censure" due to absence of 05 days w.e.f 11-09-2020 to 14-09-2020 vide this office No. 3220-21 dated 15-10-2020. 4. Awarded minor Punishment of "Stoppage of Two Annual Increments without future effect" in a disciplinary case of firing of a bullet, vide this office No. 1042-52 dated 01-03-2021. 5. Awarded Major Punishment of "Removal from Service" due to absence of 94 days w.e.f 09-12-2021 to 28-12-2022, 01-01-2021 to 31-01-2022 (51 days) & w.e.f 11-02-2022 to 14-02-2022 (04 days) & 18-02-2022 to 29-03-2022 (39 days) vide this office No. 1757 dated 29-03-2022.

Keeping in view of the above service history, non-serious behavior toward performance of duties and negligence, it is humbly requested that his departmental appeal may please be rejected for the best interest of Jail and Department.

Moreover in short service of about 2.5 years he remained absent for 173 days. Besides this a disciplinary case of bullet fire on tower during duty was also initiated and concluded against him.

This is for information and further perusal please.

SUPERINTENDENT
CIRCLE H.Q. PRISON HARIPUR



OFFICE OF THE SUPERINTENDENT
CIRCLE (EASTERN) HQs PRISON HARIPUR

No. 2352 /-

Dated 11/05/2022 /-

Phone/Fax: 0995-920066

To,
Mr. Mohsin Anees S/o Muhammad Anees Ex-Warder (BPS-07),
R/o. Mohalla Khola Kehal Tehsil & District Abbottabad (0311-5862363).

Subject:- DEPARTMENTAL APPEAL.

Memo,

Refer to the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar No. 15128 dated. 11-05-2022. (copy attached).

You are hereby informed to attend the office of the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar on 13-05-2022 at 10:00 AM for personal hearing in the subject cited Departmental Appeal as filed by you before competent authority.

de
SUPERINTENDENT
CIRCLE H.Q. PRISON HARIPUR

Endst: No: _____

Copy of the above is forwarded to the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information w/r to the No as referred above please.

Q
SUPERINTENDENT
CIRCLE H.Q. PRISON HARIPUR



BY FAX

INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406

091-9211345

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

No. 15/28

Dated. 11-05-2022

To,

The Superintendent,
Circle Headquarter Prisons Haripur

Subject: DEPARTMENTAL APPEAL
Memo;

I am directed to refer to your letter No. 2261/WE dated 28-04-2022 on the subject and to convey that **Ex-Warder Mohsin Anees S/o Muhammad Anees** attached to Central Prison Haripur may be directed to appear before the worthy Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar on **13-05-2022** at **10:00 AM** for personal hearing in the instant case. Also depute a well conversant officer alongwith Service Book as well as original record of the case to attend this office on the date and time fixed above please.


ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

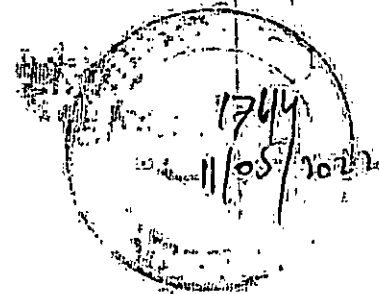
End'st; No. _____/-

Copy of the above is forwarded to PA to Worthy I.G, Prisons Khyber Pakhtunkhwa Peshawar for information.


ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

PB





OFFICE OF THE SUPERINTENDENT
CENTRAL PRISON HARIPUR
No. 873 Dated 04/02/2022

The Superintendent,
Headquarters Prison Haripur

Subject:- **DISCIPLINARY ACTION.**


Sir:-

It is submitted that the below noted warders attached to this Jail; absented/deserted themselves from duties/lines/jail premises without permission of the competent authority.

S.N	Name	Father Name	Absence Period	Total days
1.	Adnan	Muhammad Jameel	11-12-2021 to 21-12-2021	11 days
2.	Muhammad Arshad	Muhammad Shafi	16-12-2021 to 22-12-2021	07 days
3.	Mohsin Anees	Muhammad Anees	09-12-2021 to 28-12-2021 & 01-01-2022 to 31-01-2022	51 days
4.	Ibrahim	Zareen Khan	21-12-2021 to 28-12-2021	08 days
5.	Muhammad Waleed	Muhammad Rafeeq	24-12-2021 to 30-12-2021	07 days
6.	Ghulam Mujtaba	Muhammad Ashraf	24-12-2021 to 02-01-2022	10 days
7.	Shahid Iqbal	Khalid	20-01-2022 to 31-01-2022	11 days

It is therefore requested that strict disciplinary proceeding against the above mentioned official may please be initiated under the relevant rules as the charge is confirm from available record.

P.B


Superintendent
04/02/2022


SUPERINTENDENT
CENTRAL PRISON HARIPUR
04/02/2022