#### BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

In the matter of Execution Petition No.965/2023

In Service Appeal No.938/20202 Titled Qabil Jan (Ex-Cook) Vs Government of Khyber

Pakhtunkhwa and others

......Petitioner

VERSUS

Government of Khyber Pakhtunkhwa and others ......Respondents

#### INDEX

S.N.	Description of Documents	Annexure	Pages	
01.	Implementation Report		1	
02.	Affidavit		2	
03	Superintendent District Jail Lakki Marwat office order dated 19/10/2023	A	3	
04.	IG Prison office order dated 23/10/2023	В	4	
05.	Inquiry Report dated 27/02/2024	C	5-9	
06.	Superintendent Central Prison Bannu office letter dated 06/11/2023	D	10	
07.	Director Forensic Science Laboratory Peshawr office letter dated 13/11/2023	E	11	
08.	Office Order dated 13/11/2023	F	12	
09.	Superintendent Central Prison Bannu office letter dated 20/11/2023	G	. 13	
10.	Statement of Appellant	H	14	
11.	Superintendent Central Prison Bannu office letter dated 20/12/2023	I	15	
12.	Statement of Muhammad Latif (Senior Clerk) dated 26/12/2023	J .	16	
13.	Superintendent Central Prison Bannu office letter dated 09/02/2024	K .	17	
14.	Superintendent Central Prison Bannu office letter dated 15/02/2024	L L	18	
15.	Statement of Ex-Superintendent District Jail Bannu Dated 21/12/2023	M	19	
16.	Superintendent District Jail Lakki Marwat office letter dated 12/02/2024	N	20	
17.	Superintendent District Jail Lakki Marwat office letter dated 16/02/2024	O	21	
18.	Employee Creating Form Source in respect of appellant	P	22	
19.	Statement of Naveed Khan (Senior Clerk) of District Jail Lakki Marwat dated 19/02/2024	Q	23-24	
20.	Superintendent Central Prison Bannu office letter dated 18/12/2023	R	25	
21.	Superintendent District Jail Lakki Marwat office	S	26	

The state of the s		•
order dated 30/08/2019		
Statement of Muhammad Latif (Senior Clerk) now Office Assistant attached to Internment Center Lakki Marwat dated 14/02/2024	T	27-28
Appointment order dated 31/12/2017	Ū	29
Service Book (03 Pages)	V	30-32
Superintendent District Jail Lakki Marwat office letter Endst No.300 dated 14/02/2020	W	33
Superintendent District Jail Lakki Marwat office dated 14/03/2024	Х	34
	Statement of Muhammad Latif (Senior Clerk) now Office Assistant attached to Internment Center Lakki Marwat dated 14/02/2024  Appointment order dated 31/12/2017  Service Book (03 Pages)  Superintendent District Jail Lakki Marwat office letter Endst No.300 dated 14/02/2020  Superintendent District Jail Lakki Marwat office	Statement of Muhammad Latif (Senior Clerk)  now Office Assistant attached to Internment Center Lakki Marwat dated 14/02/2024  Appointment order dated 31/12/2017  U  Service Book (03 Pages)  V  Superintendent District Jail Lakki Marwat office letter Endst No.300 dated 14/02/2020  Superintendent District Jail Lakki Marwat office X

Deponent

Superintendent District Jail Lakki Marwat Respondent No.3

Respondent No.3 (For on behalf of Respondent No.1,2)

15-05-2024 peshawar

#### BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No.965/2023

In Service Appeal No.938/20202 Titled Qabil Jan (Ex-Cook) Vs Government of

Khyber Pakhtunkhwa and others

Khyber Pakhtukawa Service Tribunai

.....Petitioner

#### **VERSUS**

Government of Khyber Pakhtunkhwa and others ......Respondents

#### SUBJECT: IMPLEMENTATION REPORT IN THE SUBJECT EXECUTION PETITION ON BEHALF OF OFFICIAL RESPONDENTS

- 1. That this Honourable Tribunal passed Judgment dated 04/10/2023 in Service Appeal No.938/2020 (copy enclosed). The Honourable Service Tribunal remanded the matter to respondent department for conducting inquiry as well as also Reinstated the appellant for the purpose of inquiry.
- 2. In compliance of this Honourable Court order, the appellant was Reinstated for the purpose of inquiry vide Superintendent District Jail Lakki Marwat office order dated 19/10/2023 (copy enclosed).
- 3. According to the direction of the Honourable Service Tribunal, a Departmental Committee was constituted on 23/10/2023 (order enclosed) in order to comply with this Honourable Tribunal Judgment ibid.
- 4. That on 27/02/2024 the Superintendent Central Prison Bannu being an inquiry officer has submitted their findings/report to the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for further course of action (copy enclosed).
- 5. It is pertinent to mention here that the inquiry committee declared the appointment order of the appellant is fake and bogus and recommended those officers/officials at fault involved in the issuance of fake and bogus appointment order for departmental proceedings against them.
- 6. That on 08/03/2024, the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar forwarded the inquiry report to the office of Superintendent District Jail Lakki Marwat with the direction to register FIR against the appellant as well as the officers/officials at fault to the quarter concerned. Moreover, departmental proceedings are also under process against the officers/officials at fault.
- 7. That on 14/03/2024 the Superintendent District Jail Lakki Marwat being the competent authority as well as also respondent No.03 in the instant execution petition issued his office order No. 491 dated 14/03/2024 (copy enclosed) in which he withdrawn his earlier Reinstatement order of the appellant vide his office order No.1895-98 dated 19/10/2023 in the light of inquiry report/recommendations of the inquiry committee.

#### PRAYER:-

It is therefore most humbly prayed that on acceptance of this instant Implementation Report on behalf of the official respondent No.01 to 03, the execution petition filed by the appellant may please kindly be dismissed being devoid of merit and law.

> District Jail Lakki Marwat

Respondent No.3

(For on behalf of Respondent No.1,2)

#### BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

(a)

In the matter of
Execution Petition No.965/2023
In Service Appeal No.938/20202 Titled Qabil Jan (Ex-Cook) Vs Government of Khyber Pakhtunkhwa and others

......Petitioner

#### **VERSUS**

Government of Khyber Pakhtunkhwa and others ......Respondents

#### **AFFIDAVIT**

I, Abdul Nasir Khan Superintendent District Jail Lakki Marwat do hereby solemnly affirm and declare on oath that the contents of the Implementation Report in the subject execution petition are true and are correct to the best of my knowledge and belief and that nothing has been kept concealed from this Honorable Tribunal. It is further stated that in the present case, the answering respondents have neither been made ex-parte nor their defence has been struck off.

#### **DEPONENT**

Superintendent District Jail Lakki Marwat Respondent No.3

(For on behalf of Respondent No.1,2)

## OFFICE OF THE SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

Phone & Fax: 0969-510547 Email:districtjaillakkimarwat@gmail.com

No. 1845

No.<u>j/</u> Dated

9 710

/2023

#### OFFICE ORDER

In pursuance of Khyber Pakhtunkhwa Service Tribunal Peshawar Judgment dated 04-10-2023 in Service Appeal No.938/2020, Mr. Qabil Jan (Ex-Cook) of this Jail is hereby conditionally **Re-instated** into service with immediate effect only for the purpose of inquiry. Moreover, his fate of service, financial liabilities/back benefits etc will be subject to the final outcome of inquiry report.

SUPERINTENDENT.

DISTRICT JAIL LAKKI MARWAT

Endst No. 1896 - 99 /-

Copy of the above is forwarded to: -

- 1. The Honourable Registrar Khyber Pakhtunkhwa Service Tribunal for information please.
- 2. The Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
- 3. The District Account Officer Lakki Marwat for information please.

4. The Qabil Jan resident of Wanda Shahab Khel, Mohallah Shero Khel District Lakki Marwat for information.

SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

26/10/23

Allested

(3)



#### INSPECTORATE GENERAL OF PRISONS KHYBER PAKHTUNKHWA PESHAWAR

**91-9210334, 9210406** 

**091-9213445** 

No. CC

32978

Dated\_\_23

- 2023

#### **ORDER**

An Inquiry Committee comprising of the following officers is hereby constituted to conduct Inquiry into the matter to verify the signature and genuineness of the resignation in respect of Mr. Qabil Jan (Cook) of District Jail Lakki Marwat in the light of Judgment of Khyber Pakhtunkhwa Service Tribunal, Peshawar dated 04-10-2023 in Service Appeal No. 938/2020;

 Mr. Tahir Shahbaz Khan Wazir Superintendent Central Prison Bannu.

(Convener)

Mr. Sulaiman Senior Instructor / Law Officer

(Member)

#### TOR's are as under:

- To verify signatures and hand writing of the Cook concerned from hand writing expert as well Forensic Science Laboratory (FSL).
- ii. To inquire the genuineness of resignation tendered by the Cook concerned.
- iii. To submit clear findings and recommendations to proceed further.

The committee shall submit its report within 30 days positively based on evidences / facts for further course of action by this office as well as Superintendent District Jail Lakki Marwat.

#### INSPECTOR GENERAL OF PRISONS KHYBER PAKHTUNKHWA PESHAWAR

ENDST; No. 32979 - 83 1. WE

Copy of the above is forwarded to:

- 1. Inquiry Committee concerned for compliance alongwith the said Judgement.
- 2. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar for information.
- 3. Superintendent District Jail Lakki Marwat for information. Please, extend full cooperation with the Inquiry Committee by producing all relevant record of the case.
- 4. Mr. Qabil Jan S/O Bakhtiar Jan (Ex-Cook), Village Wanda Shahab Khel, Tehsil and District Lakki Marwat for information.

5. PS to I.G Prisons Khyber Pakhtunkhwa.

DEPUTY DIREC

INSPECTORATE GENERAL OF PRISONS KHYBER PAKHTUNKHWA PESHAWAR

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Tele & Fax # 0928-633327 cpbannu@gmail.com

OFFICE OF THE SUPERINTENDENT CENTRAL PRISON BAN

No.

Dated:

To

The Worthy Inspector General of Prisons,

Khyber Pakhtunkhwa, Peshawar.

Subject:-

ORDER/INQUIRY REPORT.

Dear Sir,

Kindly refer to your office letter No.1170 dated 05.01.2024 on the subject noted

above.

Fact Finding Inquiry Report in respect of Qabil Jan Ex-Cook attached was District

Jail Lakki Marwat is sent herewith for further disposal please.

CENTRAL PRISON BĂNNU

## FACT FINDING INQUIRY INTO THE APPOINTMENT/RESIGNATION OF CLASS-IV (COOK) QABIL JAN.

(6)

An inquiry committee comprised of Mr. Tahir Shahbaz Khan Wazir Superintendent Central Prison Bannu (Convener) & Mr. Sulaiman Senior Instructor/Law Officer of Prisons Inspectorate (Member) constituted by the Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar office order No.38978 dated 23.10.2023 to conduct fact-findings inquiry, which was scheduled on 14.02.2024in the office of Superintendent Central Prison Bannu vide Superintendent Central Prison Bannu office letter Endorsement No.808-11 dated 09/02/2024. Mr.Atiqullah Junior Clerk representative of District Jail Lakki Marwat put appearance and attended the proceeding along-with record. However, despite clear direction to Mr. Qabil Jan Ex-Cook vide Superintendent CP Bannu office letter Endst No.901-02 dated 15/02/2024 to appear before the inquiry committee on 19/02/2024 at 10:00 AM for the purpose of inquiry proceeding but he remained absent and did not bother to appear before the inquiry committee. However, Mr. Naveed Iqbal Pay In-charge representative of District Jail Lakki Marwat attended the office of Superintendent CP Bannu on 19.02.2024.

#### **GROUNDS:**

- To verify signatures and handwriting of the cook concerned from handwriting expert as well as Forensic Science Laboratory (FSL).
- ii. To inquire the genuineness of resignation tendered by the cook concerned.
- iii. To submit clear findings and recommendations to proceed further.
- iv. First time Source Form (Source-One) submitted to Local Audit office, if not available in officer record then which may be obtained from Local Audit office.
- v. Mention the specific names of the officers/officials they were posted at District Jail Lakki Marwat at the time of appointment/withdrawn of salary of Ex-cook (w.e.f 01-01-2018 to 08/2019).
- vi. To ascertain from the record of your Jail as to whether the Excook concerned regularly performed his duties during the period from 01/01/2018 to 08/2019 or otherwise.

#### **PROCEEDINGS:**

According to the directions of Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar as contained vide its office letter referred to above as well as the direction given in Judgment dated 04/10/2023 of the Hon'ble Khyber Pakhtunkhwa Service Tribunal Peshawar, the inquiry committee approached the Director Forensic Science Laboratory Peshawar vide Superintendent Central Prison Bannu letter No. 6384/WE dated 06.11.2023 (Copy attached as Annex-A) with enclosures/provision of Resignation letter, Specimens Urdu signature, Specimen Urdu Hand Writing, Service Book & Statement, possessing routine Urdu signatures/Urdu hand writing of Ex-cook Qabil Jan for verification of signatures & Hand Writing & Genuineness of resignation tendered by the cook concerned namely Qabil Jan from Hand Writing Expert as well Forensic Science Laboratory (FSL). However, in response the Forensic Laboratory Department Peshawar requested the Superintendent Central Prison Bannu being convener of the inquiry committee to provide

Source of

specimen of Urdu Hand Writings on one sheet and 10/15 more fresh specime of Urdu Hand Writings in three different modes i.e. slow, normal and fast, each on separate sheets with full dictation from the questioned body hand writings on the disputed Resignation Letter along-with sufficient more routine Urdu signatures/Urdu Hand writings, on Bank used Cheques, Bank SS Card, Explication, letters, examination papers of some other documents vide his letter No. 90/FSL dated 16.11.2023. (Copy attached as Annex-B). The convener of the inquiry committee called the Ex-cook (Qabil Jan) to write/provide the required documents as requested by the Director Forensic Science Laboratory Peshawar within 02 days positively in order to ascertain the veracity of the alleged/disputed signature whether genuine or fake vide Superintendent Central Prison Bannu office letter No.6716 dated 20/11/2023 (Copy attached as Annex-C). However, the Ex-cook refused to write afresh resignation letter as a sample for Forensic Science Laboratory (copy of the refusal is attached as Annex-D). Mr. Latif Khan now Office Assistant presently attached with Internment Centre Lakki Marwat while attached at that time as a Senior Clerk to DJ Lakki Marwat also attended the Inquiry Committee proceeding on due date and time and the committee recorded his statement and also cross examined him (Copy attached as Annex-E). However, Mr. Qabil Jan Ex-Cook remained absent and did not attend the Inquiry Committee on scheduled dates and times for questioning and answering from him vide this office letters No.808-11 dated 09.02.2024 and Urdu letter No.900 dated 15.02.2024 (copies attached as Annex-F&G). He was also informed through his WhatsApp and mobile call. However, he remained absent again.

#### FINDINGS:

The Inquiry Committee reached to the following conclusions/findings: -

- 1. When checked record of District Jail Lakki Marwat, it was observed that the appointment order of the concerned cook was totally bogus/fake as there is no entry found in the dispatch register nor any minutes of the appointing committee found/provided by the representative of District Jail Lakki Marwat. Furthermore, signature of appointing authority in service book/office order were found different and when the committee approached the appointing authority i.e. Mr. Ghulam Rabbani, the then Superintendent of District Jail Lakki Marwat (appointing authority), for verification/genuineness of his signatures on appointment order and in Service Book vide letter No. 7430/WE dated 20.12.2023,(Copy attached as Annex-H), in response he replied that signatures on appointment order and in Service Book of Cook Qabil Jan are fake and not signed by him and the then Superintendent Mr.Ghulam Rabbani (now retired) clearly stated in his statement that the said cook was not appointed by him (Copy attached as Annex-I)
- 2. According to statement/verbal questions from representative of District Jail Lakki Marwat regarding Record of Arrival Report, Employment Exchange Card, Agreement deed, and Minutes of meeting, in reply he replied that all the said documents are not available in jail record.

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Clerk also stated that the District Accounts officer Lakki Marwat was approached vide Superintendent District Jail Lakki Marwat letter Endst: No.253-54 dated 12/02/2024 & No.292-93 dated 16.02.2024 (Copy attached as Annex-J&K) for provision of First-time source i.e., Source-1, which is attached as (Annex-L). He has also stated before the Inquiry Committee that other record related to appointment of Ex-cook is not available. (Statement of Naveed Iqbal is attached as Annex-M), as well as stated in his second statement on 19.02.2024 (copy attached as Annex-N) that the said Ex-Cook was neither reported for duty at District Jail Lakki Marwat, nor any attendance regarding his duty is found in attendance register, nor any entry found in 16 number register to show his presence in jail premises.

- 3. When the committee approached Mr. Asif Ali Superintendent District Jail Lakki Marwat regarding verification/genuineness of his signature on the order of resignation of Qabil Jan vide letter No. 7359/WE dated 18.12.2023 (Copy attached as Annex-O). Accordingly Mr. Asif Ali Shah Ex-Deputy Superintendent Jail who served that Jail from 26/01/2018 to 08/2019, replied that signature on resignation order is genuine (Copy attached as Annex-P).
- 4. Qabil Jan Ex-Cook also refused to write afresh resignation letter as a sample required to Forensic Science Laboratory (FSL) for further investigation as directed by the Honorable Service Tribunal in Judgment (Copy attached as Annex-D).
- 5. When a question was asked from Mr. Qabil Jan (Ex-cook) in the previous inquiry that who issued/delivered order of appointment to you, he replied that Mr. Latif Senior Clerk while attached to District Jail Lakki Marwat delivered order of appointment to him (Copy attached as Annex-Q).
- 6. Mr. Qabil Jan remained absent and not appeared before the inquiry committee on scheduled date i-e 19/02/2024 and time at 10:00 AM with reference to the Superintendent CP Bannu office letter Endst: No.808-11 dated 09.02.2024 & Endst: No.901-02 dated 15/02/2024 (Annex-F & G) for inquiry proceedings and his this act of negligence shows that he is guilty.
- 7. Mr. Muhammad Latif Assistant was responsible, and it was his official duty being Senior Clerk to reconcile reconciliation statement with Expenditure statement of local District Accounts office, but he shown ignorance/failed to do so, and he put his duty on the shoulder of another as stated in his statement (statement is attached as Annex-R).
- 8. As provided by Superintendent District Jail Lakki Marwat copies of Service Book pages, Appointment order and letter of recovery addressed to Mr. Qabil Jan are also attached for ready reference as (Annex-S).

Tray by

(9)

#### RECOMMENDATION: -

Keeping in view of the above Fact Findings, the following recommendations are hereby recommended that:

- 1. Mr. Latif Khan the then Clerk are hereby recommended for **Major**Penalty for issuance bogus Appointment order to Mr. Qabil Jan Ex-cook according to statement of Mr. Qabil Jan Ex-cook as well as the then Superintendent District Jail Lakki Marwat Mr. Ghulam Rabbani (appointing authority) who also stated in his written statement that he did not appointed Mr. Qabil Jan as a Cook in his tenure.
- 2. Amounting to Rs. 546080/- may also be recovered from Mr. Qabil Jan through District Police officer Lakki Marwat as he was appointed bogusly and drew salaries illegally from the Government exchequer.
- 3. Administration of District Jail Lakki Marwat may also be directed to keep his record maintain to avoid later-on complications.

Submitted for information and further necessary action, please.

(SULAIMAN)
SENIOR INSTRUCTOR/LAW OFFICER
PRISONS INSPECTORATE PESHAWAR
(Member)

TAHIR SHAHBAZ KHAN WAZIR SUPERINTENDENT CENTRAL PRISON BANNU (Convener)

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POPERINTENDENT OLLICE OL LHE

esos/1/196 bosed 2856 ON

CENTRAL PRISON BANNU

Tele & Fax 0928-633327/633326

Peshavart Forensic Science Laboratory, The Director,

TO DISTRICT JAIL LAKKI MARWAT. KESPECT OF QABIL KHAN EX-CLASS-IV (COOK) ATTACHED erplect: EORENSIC ANALYSIS OF HANDWRITING/SIGNATURE HE

Memor

commuttee: attached) wherein the undersigned was nominated as the convener of the Peshawar vide his office Mento No. 38979 dated 23.10.2023 (Copy the order of the Worthy Inspector General of Prisons Khyber Pakhtunkimur Qabil Khan Ex-Class IV (Cook) attached to District Jail Lakki Marreat by It is submitted that an inquiry has been constituted against

General of Prisons Khyber Pakhtunkhwa, Peshawar in the inquiry under The following TORs were issued by the Worthy inspector

from hand writing expert as well forensic science laboratory 1) To verify signatures and hand writing of the Concerned

2) To inquire the genuineness of resignation rendered by the Cook

light of the above mentioned TORs under intimation to this philippe. It is therefore requested to kindly conduct borensies in

2.\*Original Resignation Letter 1. Original Service Book Euclosures: 💉

4. Photocopy of CNIC 3. Statement of the concerned Cook

5. 40 Nos. of sample signatures by the concerned Cook on 3

separate sheets.

-0 WONWE CENTRAL PRISON RYMMA зорекийтей реит

Copy of the above is forwarded to: Endst: No 6385-87

information with reference to above, please The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar, for .[

General of Prisons, Khyber Pakhtunkhwa Peshawar for information Mr. Suleiman, (Member) Senior Instructor/Law Officer, Inspectorate

District Lail Lakki Marwat for informunion

The Superintendent,

please.

`&

GMW AG MALE ENERGINGENDER.



#### OFFICE OF THE SUPERINTENDENT **CENTRAL PRISON BANNU** No. 6384 Dated 06/11/2023 Tele & Fax: 0928 633327/633326

To

The Director, Forensic Science Laboratory. Peshawar.

Subject: FORENSIC ANALYSIS OF HANDWRITING/SIGNATURE IN RESPECT OF QABIL JAN EX-CLASS-IV (COOK) ATTACHED TO DISTRICT JAIL LAKKI MARWAT.

Memo:

It is submitted that an inquiry has been constituted against Qabil Khan Ex-Class IV(Cook) attached to District Jail Lakki Marwat by the order of the Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar vide his office Memo No.38979 dated 23.10.2023(Copy attached) wherein the undersigned was nominated as the convener of the committee.

The following TORs were issued by the Worthy Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar in the inquiry under reference:-

- 1) To verify signatures and hand writing of the Cook concerned from hand writing expert as well forensic science laboratory (FSL).
- 2) To inquire the genuiness of resignation tendered by the Cook concerned.

It is therefore, you are requested to kindly conduct Forensic Analysis in light of the above mentioned TORs under intimation to this office please.

#### Enclosures:

- 1. Original Service Book
- 2. Original Resignation Letter
- 3. Statement of the concerned Cook
- 4. Photocopy of CNIC
- 5. 10 Nos. of sample signatures by the concerned Cook on 3 separate

#### SUPERINTENDENT **CENTRAL PRISON BANNU**

#### **Endst: No.** 6385-87/-

Copy of the above is forwarded to:

- 1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar, for information with reference to above please. and the second of the second o
- 2. Mr.Sulaiman, (Member) Senior Instructor/Law Officer, Inspectorate General of Prisons, Khyber Pakhtunkhwa Peshawar for information
- 3. The Superintendent, District Jail Lakki Marwat for information please.

SUPERINTENDENT **CENTRAL PRISON BANNU** 

## Confidential



### JUSTICE THROUGH SCIENCE FORENSIC SCIENCE LABORATORY, PESHAWAR, EXAMINATION REPORT FORM (D)

#### IMPORTANT NOTICE.

Then summons are issued for the attendance of the EXPERT for evidence, reference must be made to the date and Serial No. of this report.

Laboratory, No. 30-814-823-23 DT; 13-11-2023

Subject: coressicasalissis of haso writisgsforthed is respect to CABIL KRANTNA LASSAY & GOKENTESCHI D 10 (BSUBCLAME), MONORAL

The following documents were received for examination:-

- 1. Disputed "Resignation Letter" dated 28-09-2019, bearing the questioned Urdu band wrangs manaed as Q1 الله Urdu signature "قبيل جان بقلم خو د" marked as Q2 with pencil
- 2. Specimens Urdu signatures of "قبيل جان" on three sheets.
- Specimens Urdu hand writings of "فيل جان" on one sheet.
- 4. Service book & statement, possessing routine Urdu signatures/Urdu hand writings of "قَبِينُ جَان".

## PRELIMINARY, REPORT

The preliminary examination of the documents was carried out with the following observations.

- 1. Specimens Urdu hand writings obtained from "قبيل جان" on one sheet, which have not been taken according to its prescribed rule. It is therefore requested that 10/15 more tresh specimens. Urdu hand writings may please be obtained from "6 15 Lis" in three different modes slow normal first and each mode on separate sheets with full dictation from the questioned body band whatey is
- 2. Service book & statement supplied as routine Urdu signatures/Urdu hand writings of "قَبِيلُ جَانَ are insufficient for detail examination, it is therefore requested that sufficient more routine Urdu signatures/Urdu hand writings of "قبيل جان" may please be procured, which he might have had done in the past before the execution of the disputed Resignation Letter, on bank used cheques, bank SS Card, application, letters, examination papers or on some other documents etc in (Original) because of its great use in the examination and comparison work and also to expressed

a definite, professional and accurate opinion.

Questioned Documents Expert FSL, Peshawar

Questioned Documents Expert.

FSI., Peshawar At Got whents are forwarded to Superintendent \_/FSL Dated Peshswar the 16114 The preliminary report of the experts alongwith

Central Prison Bansu.

Note: This report car ies Emboss Marks.

director Nience Laboratory



## JUSTICE THROUGH SCIENCE FORENSIC SCIENCE LABORATORY, PESHAWAR, EXAMINATION REPORT FORM (D)

#### IMPORTANT NOTICE

When summons are issued for the attendance of the EXPERT for evidence, reference must be made to the date and Serial No. of this report.

Laboratory No. 30-814-823-23 DT: 13-11-2023

Subject: Forensic analysis of handwriting <u>isignature in respect of</u>
QABIL JAN EX-CLASS-IV (COOK) ATTACHED TO DISTRICT JAIL LAKKI MARWAT.

The following documents were received for examination:-

- 1. Disputed "Resignation Letter" dated 28-09-2019, bearing the questioned Urdu hand writings marks as Q1 & Urdu signature قبيل جان بقلم خود marks as Q2 with pencil
- 2. Specimens Urdu signatures of "قبيل جان" on three sheets.
- 3. Specimens Urdu hand writings of "قبيل جان" on one sheet.
- 4. Service Book & statement, possessing routine Urdu signatures/Urdu hand writings of "قبيل جان"

#### PRELIMINARY REPORT

The preliminary examination of the documents was carried out with the following observations:-

- 1. Specimens Urdu hand writings obtained from "قبيل جان" on one sheet, which have been taken according to its prescribed rule. It is therefore requested that 10/15 more fresh specimens Urdu hand writings may please be obtained from "قبيل جان" in three different modes slow normal fast and each mode on separate sheets with full dictation from the questioned body hand writings of the disputed Resignation Letter.
- 2. Service book & statement supplied as routine Urdu signatures/Urdu handwritings of "فبيل جان" are insufficient for detail examination, it is therefore requested that sufficient more routine Urdu signatures/Urdu hand writings of "فبيل جان " may please be procured, which he might have had done in the past before the execution of the disputed Resignation Letter, on bank used cheques, bank SS Card, application, letters, examination papers or on some other documents etc in (Original) because of its great use in the examination and comparison work and also to expressed a definite, professional and accurate opinion.

Questioned Document Expert FSL, Peshawar

Questioned Document Expert FSL, Peshawar

No. 90/ FSL Dated Peshawar the 16/11/2023

The preliminary report of the expert's alongwith all the documents are forwarded to Superintendent Central Prison Bannu.

Note: This report carries Emboss Marks.

Director
Forensic Science Laboratory,



#### OFFICE OF THE Central Prison Bannu

Dated 20/11

Qabil Jan (Ex-Cook), Resident of Wanda Shahab Khel at Mohallah Shero Khel Lakki City, District Lakki Marwat.

Subject: - PROVISION OF RECORD.

Memo:

Refer to the Forensic Science Laboratory, Peshawar Office Letter No. 90/FSL dated 16.11.2023.

It is submitted that as per the direction of the Worthy Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar the undersigned being the Inquiry Officer sent your Signature and Handwriting to the Forensic Science Laboratory, Peshawar (FSL) to verify its genuineness. Subsequently, the FSL returned the documents with the remarks to collect the following documents from you and re-submit the case afresh:

- 1. 10/15 Specimen Urdu Hand writings in three different modes Slow, Normal and Fast on each sheet with full dictation from the questioned body hand writings on the disputed Resignation Letter.
- 2. Sufficient routine Urdu Signatures/Handwritings may be produced, which you might have done in the past before the execution of the disputed Resignation Letter, on Bank Used Cheques, Bank SS Card, Application, Letters, Examination Papers or on some other documents etc in (ORIGINAL) because of its great use in the examination and comparison work and also to express a definite, professional and accurate opinion.

You are hereby informed to provide the above mentioned documents within Two Days positively, ... =.

enthan prison bannu

Endst: No Copy of the above is forwarded to: -

1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.

2. The Superintendent, District Jail Lakki Marwat once again with the request to submit the above mentioned requisite documents to this office as soon as possible if available, so as to further proceed into the

3. Mr. Sulaiman, Senior Instructor/Law Officer, Inspectorate General of

Prisons, Khyber Pakhtunkhwa Peshawar.

(For information with reference to above quoted order, please)

SUPERINTENDENT CENTRAL PRISON BANNU

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#### OFFICE OF THE SUPERINTENDENT CENTRAL PRISON BANNU NO 7428 Dated 20 / 12 /2023

To

Mr. Latif Khan ( scistart) Attached Internment Centre Lakki Marwat.

Subject:-

ORDER/INQUIRY

Memo:

Reference to the Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar order No. 38978 dated 23.10.2023.

Being the inquiry officer/convener as constituted vide order under reference, you are hereby directed to appear before the office of the undersigned on 26.12.2023 at 11:00 AM to conduct the inquiry (regarding the appointment office order in respect of Mr.Qabil Jan (Cook) attached to District Jail Lakki

Marwat.) Therefore, you are hereby directed to appear before the inquiry officer on the above fixed date /time positively.

Inquiry Officer

(TAHIR SHAHBAZ KHAN WAZIR) Superintendent CENTRÁL PRISON BANNU

Endst: No.\_742

Copy of the above is forwarded to the Worthy Inspector General of Prisons

Khyber Pakhtunkhwa Peshawar for information with references to above, please.

Inquiry Officer

HBAZ KHAN WAZIR) SUPERINTENDENT

*ا* ر 26/12/23



Tels/Pax: 0928 693327

OFFICE OF THE SUPERINTENDEM'T CENTRAL PRISON BANNU Dated\_

To

The Superintendent, District Jail Lakki Marwat.

Subject: Memo;

ORDER/INQUIRY REPORT

Reference to the Worthy Inspector General of Prisons Klivis: Pakhtunkhwa Peshawar letter No.7518/WE dated 31.01.20 on the subject noted above.

It is submitted that Worthy Inspector General of Prisons Klight Pakhtunkhwa Peshawar returned the inquiry of Qabil Jan Ex (attached with District Jail Lakki Marwat with the remarks that area. inquiry be conducted into the matter, which shall cover the following points/requirements for further appropriate action:

First time Source Form (Source-One) submitted to Local Audit conif not available in officer record then which may be obtained

Mention the specific names of the officers/officials they were p at District Jail Lakki Marwat at the time of appointment/with Local Audit office. of salary of Ex-cook (w.e.f 01-01.2018 to 08/2019).

Ascertain from the record of your Jan as to whether the E concerned regularly performed his duties during the period 01.01.2018 to 08/2019 or otherwise

Therefore, you are requested to provide the above require: through your representative in hard form (attested) on 18.02.2 11:00AM for conducting afresh induity in the matter

Endst: No Zo8-1

Copy of the glove is for varded to

1. The Worthy Inspector Conferal of Parisons Aliter Paking Peshawar for information with reference to above please

2 Mi Selftmen Sento, Indirector/Lev Officer of Prisons insi-mention of the incurrent committee for information with the recurse mention of the incurrent committee for information with the recurse and drice of the andersignal light rectuate and time to the

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OFFICE OF THE
SUPERINTENDENT
CENTRAL PRISON BANNU
No.\_\_\_\_\_/
Dated\_\_\_\_/\_\_\_/2024
Tele/Fax: 0928 633327

То

The Superintendent, District Jail Lakki Marwat.

Subject: Memo;

#### ORDER/INQUIRY REPORT.

Reference to the Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar letter No.7518/WE dated 31.01.2024 on the subject noted above.

It is submitted that Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar returned the inquiry of Qabil Jan Ex-Cook attached with District Jail Lakki Marwat with the remarks that afresh inquiry be conducted into the matter, which shall cover the following points/requirements for further appropriate action:-

- 1. First time Source Form (Source-One) submitted to Local Audit office, if not available in officer record then which may be obtained from Local Audit office.
- 2. Mention the specific names of the officers/officials they were posted at District Jail Lakki Marwat at the time of appointment/withdrawal of salary of Ex-cook (w.e.f 01-01.2018 to 08/2019).
- 3. Ascertain from the record of your Jail as to whether the Ex-cook concerned regularly performed his duties during the period from 01.01.2018 to 08/2019 or otherwise.

Therefore, you are requested to provide the above requirements through your representative in hard form (attested) on 14.02.2023 at 11:00AM for conducting afresh inquiry in the matter.

#### SUPERINTENDENT CENTRAL PRISON BANNU

Endst:	No.	·	/	•

Copy of the above is forwarded to:

- 1. The Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information with reference to above please.
- 2. Mr. Sulaiman, Senior Instructor/Law Officer of Prisons Inspectorate member of the inquiry committee for information with the request to attend office of the undersigned on fixed date and time for the purpose to conduct afresh inquiry in the matter.
- 3. The Incharge Internment Centre Lakki Marwat for information with the direction to detail Mr. Muhammad Latif Assistant temporary attached with your centre for the above purpose.
- 4. Mr. Qabil Jan Ex-Cook Resident of Wanda Shahab Khel, Mohallah Shero Khel Lakki City District Lakki Marwat for information with the direction to attend this office on the above fixed dated and time.

SUPERINTENDENT CENTRAL PRISON BANNU



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OFFICE OF THE SUPERINTENDENT CENTRAL PRISON BALL. No.

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ORDER/INQUIRY REPORT. - . . .

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# OFFICE OF THE SUPERINTENDENT CENTRAL PRISON BANNU No.\_\_\_\_\_/ Dated\_\_\_\_/\_\_\_/2024

Tele/Fax: 0928 633327

To,

Mr. Qabil Jan Ex-Cook, Resident of Wanda Shahab Khel, Mohallah Shero Khel, District Lakki Marwat. مستر قابیل جان سابق باورچی، پتہ واندہ شہاب خیل محلہ شیرو خیل کا رہائشی ضلع لکی مروت

Subject:-

آر ڈر/انکوائری رپورٹ۔.ORDER/INQUIRY REPORT

Memo;

اس دفتری خط نمبر 808-11 مورخہ 09.12.2024 کے تسلسل میں مذکورہ موضوع پر بتایا گیا ہے کہ انکوائری کی کمیٹی جو کہ انسپکٹر جنرل جیل خانہ جات خیبر پختونخواہ پشاور نے تشکیل دی تھی اور آپ کو انکوائری کی کارروائی کے لیے مورخہ 14.02.2024 کو انکوائری کمیٹی کے سامنے پیش ہونے کی ہدایت کی گئ تھی لیکن آپ کمیٹی کے سامنے پیش نہیں ہوئے۔

لہذا، آپ کو ایک بار پھر ہدایت کی جاتی ہے کہ 4200. 20 آگ 10:00 کو صبح 10:00 بجے انکوانری کمیٹی کے سامنے حاضر ہو جانیں، غیر خاضری کی صورت میں آپ کے خلاف قراعد کے تحت یک طرفہ کارروانی کی جانے گی.

سپرنٹنڈنٹ سنٹرل جیل بنوں

Endst: No.\_\_\_\_/

Copy of the above is forwarded to the: -

- 1. Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information with reference to this office endorsement referred to above please.
- 2. The Superintendent District Jail Lakki Marwat for information with the request that the concerned pay branch incharge be detailed to this office alongwith first time source which is still awaited from your end on the above date and time, earlier your office detailed the representative unrelated and unaware from the case stated in his statement.

SUPERINTENDENT CENTRAL PRISON BANNU



Tele & Fax 0928-633327/633326

# OFFICE OF THE SUPERINTENDENT CENTRAL PRISON BANNU NO 7430/20Dated 20 / 12/2023

То

Mr. Ghulam Rabbaoni (Ex-Superintendent Jail, Central Prison Bannu) Whatsapp No:0300-9065547

Subject:-

ORDER/INQUIRY

Memo:

Reference to the Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar order No. 38978 dated 23.10.2023.

Being the inquiry officer/convener as constituted vide order under reference to verify the appointment order in respect of Mr.Qabil Jan (Cook) attached to District Jail Lakki Marwat, as that time you were the Superintendent of District Jail Lakki Marwat. (Office order copy alonwith service book signatures is attached).

Therefore, you are hereby requested to verify your signatures alongwith office order copy whether its genius or otherwise.

Inquiry Officer

(TAHIR SHAHBAZ KHAN WAZIR)
SUPERINTENDENT
CENTRAL PRISON BANNU

Endst: No. 7431 /

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

Inquiry Officer



#### Office of the superintendent DISTRICT JAIL LAKKI MARWAT

A : 0909 510547

F. d. districtfattlakklmarmatogmall.com

Dated 12 / 01 /2024

To.

The District Accounts Officer, Lakki Marwat

Subjective

ORDER / INQUIRY REPORT

R.Sir.

Reference to the Superintendent Central Prison Bantan Intra-No.808-11 dated 09.02.2024 (copy attached).

It is submitted that kindly provide First Time Source Form (Source) one) submitted to your good office for starting the pay of Ex-cook Mr. Qualified (Personal No.874729) for the month of 01/2018 for onward submission to quarter concerned for inquiry purpose please.

An early action in the matter is required.

SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

Endst No. 257-54/-

Copy of the above is forwarded to:

1. The Worthy Inspector General of Prisons Khyber Pakhtunkhwa Posherwar Jor information please. .

2. The Superintendent Central Prison Bannu for information please.

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DISTRICT JAIL LAKKI MARWAT

My Takir Stahbaz Superintent Central Priser Banno Inquiry officer

Please the fer B your office No 7430d20.122022

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Treceved Through what APP No 03339722722, It is

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My Signatures Shown in the documents under

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dt. 21-12-2023

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TO TANK

Mr. Tahir Shahbaz Superintendent Central Prison Bannu Inquiry Officer

Please refer to your office No.7430 dt 20/12/2023 received through WhatsApp No.03339722722. It is stated that I have not made any appointment of Cook post during my Tenure at District Jail Lakki Marwat. Appointment letter is totally bogus, fraudulent & my signatures shown in the documents under reference letter are fake, fabricated and incorrect.

dt:21-12-2023

#### **GHULAM RABBANI**

Ex-Superintendent Central Prison Bannu WhatsApp No:03009065547 Alt#: 03470978047

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#### OFFICE OF THE SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

$ ot \!$							
No			/				
Dated	-	/	/2024				

To,

The District Accounts Officer,
Lakki Marwat

Subject: -

ORDER / INQUIRY REPORT

R/Sir,

Reference to the Superintendent Central Prison Bannu letter No.808-11 dated 09.02.2024 (copy attached).

It is submitted that kindly provide First Time Source Form (Source-one) submitted to your good office for starting the pay of Ex-cook Mr. Qabil Jan (Personal No.874729) for the month of 01/2018 for onward submission to quarter concerned for inquiry purpose please.

An early action in the matter is required.

SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

Endst No.

Copy of the above is forwarded to:

- 1. The Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
- 2. The Superintendent Central Prison Bannu for information please.

SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

M

(21)

OFFICE OF THE SUPERINTENDENT DISTRICT JAIL LARKI MARWAY

1: 0969-510547

NA districtfalllakkimarwatogmati.com

Dated \_ 16\_102-12021

Tan.

The District Accounts Officer, Lakki Marwat

Subject :

ORDER / INQUIRY REPORT

R/SH.

Reference to the Superintendent Central Prison Baunu letter Mo. 13(6) dated 15:02.2024 (copy attached).

in continuation to this office letter No.252 dated 12.02.2024.

It is once again submitted that kindly provide First Time Source Form (Source-one) submitted to your good office for starting the pay of Ex-Cook. Mr. Qabil Jan (Personal No.874729) for the month of 01/2018 for onward submission to quarter concerned for inquiry purpose please.

An early action in the matter is required.

SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

Endst No. 992-931.

Copy of the above is forwarded to:

1. The Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.

2 The Superintendent Central Prison Bannu for information please.

SUPERINTENDENT DISTRICT JAIL PAKKI MARWAT

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## OFFICE OF THE SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

To,

The District Accounts Officer, Lakki Marwat

Subject: - ORDER / INQUIRY REPORT

R/Sir,

Reference to the Superintendent Central Prison Bannu letter No.900 dated 15.02.2024 (copy attached).

in continuation to this office letter No.252 dated 12.02.2024.

It is once again submitted that kindly provide First Time Source Form (Source-one) submitted to your good office for starting the pay of Ex-Cook Mr. Qabil Jan (Personal No.874729) for the month of 01/2018 for onward submission to quarter concerned for inquiry purpose please.

An early action in the matter is required.

SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

Endst No.\_

Copy of the above is forwarded to:

- 1. The Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
- 2. The Superintendent Central Prison Bannu for information please.

SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT . EMPLOYEE CREATING FORM SOURCE-I Token No. /2018 Dated 1. Office Name Superintendent District Jail, Lakki Marwat. 2. For the Month of 6 /2018 3. DDO Code LK-4004 4. Current Govt;; KPK 5. Employee Group \_\_\_Cook\_ 6. Employees Scale BPS-63 7. Employee NIC No. 011201-76.9911-9 8. Date of Birth 02-02-1994 9.Date of Entry Govt; Service el-el-2018 10. Name Gaheel Jan 11. Father Name Rakhtian Kham. 12.G.P Fund Account No. 13. Ministry Organizations;-\_\_\_ DETAIL OF PAY AND ALLOWANCES. 4610 LRS: 1961 1.Basic Pay 942 Rs (2883 2.H.R.A 1785 Rs 3.Conveyance Allow: 1500 Rs; 4. Medical Allow: 5. Washing Allow; 50 Rs; 6.A.R-2013 29316-10 7.A.R-2015 8.A.R-2017 9. Prision Allow Total; Net: 27795-1 **DEDUCTION:-**3003-G.P. Fund 3530-Police W. Fund 4004-Reifred on Pension & Death Compensation Total;

District Accounts Officer,

Lakki Marwat.

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# OFFICE OF THE SUPERINTENDENT CENTRAL PRISON BANNU

То

Mr. Asif Ali Shah (Ex-Superintendent District Jail Lakki Marwat) Whatsapp No:0312-9179638

Subject:-

ORDER/INQUIRY

Memo:

Reference to the Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar order No. 38978 dated 23.10.2023.

Being the inquiry officer/convener as constituted vide order under reference to verify the resignation in respect of Mr.Qabil Jan (Cook) attached to District Jail Lakki Marwat, as that time you were the Superintendent of District Jail Lakki Marwat.

Therefore, you are hereby directed to verify your signature whether genius or otherwise.

Inquiry Officer

(TAHIR SHAHBAZ WAZIR) SUPERINTENDENT CENTRAL PRISON BANNU

Endst: No. 7360

Sur

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

Inquiry Officer

(TAHIR SHAHBAZ WAZIR) SUPERINTENDENT CENTRAL PRISON BANNU

Office Of the Superintenden: District bull takk! Mac at 838 Dated - 30. 3 - 7011

Resignation tendered by Mr. Qabil Jan Cook (BPS-03) glated 79-08-2019 to leachy accepted, with immediate effect as requested by him

DISTRUT JAH, LAKKI MARWAT

ENDST:No 839-40 /Copy forwarded to:-

1. District Accounts Officer for information and necessary action.

2. Mr Qabil Jan S/o Bakhtiar Jan village Wanda Shahab Khel, Teh & District Lakki Marwat for information with reference to his resignation dated 29-08-2019.

DISTRUTJAH, LAKKI MARWAT

It is submitted for your kind information, in reference to your letter (7359) dated 18/12/23, It is verified that the above signature under Sir,

19/12/2023 Asif Alished Ex Supal. Jail Lakki Mountal

Office Of the
Superintendent
District Jail Lakki Marwal
No. 238
Dated: 30-8-2019

ORDER.

Resignation tendered by Mr. Qabil Jan Cook (BPS-03), dated 29-08-2019 is hereby accepted with immediate effect as requested by him.

SUPERINTENDENT DISTRCT JAIL LAKKI MARWAT

ENDST: No 839-40 /-

Copy forwarded to:-

1. District Accounts Officer for information and necessary action.

2. Mr Qabil Jan S/o Bakhtiar Jan village Wanda Shahab Khel, Teh & District Lakki Marwat for information with reference to his resignation dated 29-08-2019.

SUPERINTENDENT DISTRCT JAIL LAKKI MARWAT

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المار من معور کل معرفی موادیا . او مر کر کوری کا Ech 3/-12-2017: h ورب، میں استعقاء کیس دیا ہے الركرى مع نفالم ثمر مع في مولد ويان عبدا مرسل ميرسانها الما المساس عبد المرسانة المرسانة المرسانة المرسانة الم ورب من 2012 من دوئی گرفا (رویان میں 4 ماہ مزاری نع مراباد- میں نے ملی میں میں اور المواری میں دوری کی ہے۔ موا باد- میں نے ملی جمل میں واور المواری میں دلوتی کی تھا۔ ( Le of Control with the super feature of the series of th واب، من بطور دن عمرتی بتواعاً. · 65/2 31-12-2017 -1 -19 ولالمبر السيل كبادما عا؟ حراب ریان (معران میران And Jary Constitution of the Constitution والدكر آب ووزرك سانالا تي هي سول عير ها كيا آج يُسرون على فردور كاللا كي ي (6 6 m) Ub -5 -150 ( Se Ling out excel) of the self of the se 

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عاری کری کری کاری میری کا میری کاری کاری کاری کاری کاری کاری داری ری میران از کری عامب کیاس بر رنسل بر رنسان میراند ما کسی در از کری کوکس نے اور کب اطلاع دی کری کی ما استفنی منظور ما ترا که از کور دالت سے کیا رو اول کیا ؟ مراب المراب ما المراب مراب المحلف الله ولس ما المح الركام المحقود الله الما المحقود الله الما المحقود الله الما المحقود الما المحقود الما المحقود المرابع المحتود ال Significant Long Com magnet Dig 31. 29 (1) وراب! - مجيد سطيف المحسل السين عرف كالرماك ،

ا کے کتنا نصلے کیا ہے ۔ ور الفر العند العن اور سننے علاس فور دالزمین سے ملی جبل میں ) ور بر ما تقل المراح القالور في المراط المراجع على كن كن على بن جو لي ماد كي (all Car.



OFFICE OF THE SUPERITENDENT
DISTRICT JAIL LAKKI MARWAT.
No. 1/23 DATED 31-12-2-17

### OFFICE ORDER

Undersigned is pleased to offer Mr. Qabeel Jan S/O Bakhtlar Jan, R/O Wanda Shahab Khel Lakki Marwat residing in Mohallah Shero Khel Lakki city a temporary post of Mar in Jail on Basic Pay Scale No.1 on pay Rs. 9130-290-17830. His appointment will take effect from the date he joins the duty at the Office of his posting.

- 1- His appointment will take effect from the date he joins the duty at the office of his posting,
- 2- His appointment is puarely temporary and his 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 him for Joining his first appointment.
- 4- In case he wishes to resign at any time he will give two months notice or in fleu thereof two months pay will be forfeited from him subject to the discretion of the competent authority in public interest.
- 5- His appointment is subject to his Medical Fitness for Government service,
- 6- He will be eligible for continuance on the post if his work and conduct remain satisfactory during the period of his temporary appointment.
- 7- His services will be terminated if his work and conduct is not found satisfactory or the vacancy ceases to exist.
- 8- The terms and condition of his service will be those as laid down in the West Pakistan Government Servant (Conduct) Rules 1987.
- 9- For all other purposes such as Pay, TA and Medical Attendance etc, his will be governed by such rules as may be issued by the government for the category of Government servant of the Prison Department to which he will belong.
- 10- He will be governed by the West Pakistan Government servant conduct rules 1987, the NWFP Civil servant act 1973, the civil servant (appointment, promotion and transfer) rules 1989, KPK Government servant (E&D) Rules 2011 and all other rules/regulations framed by the Government from time to time.
- 11- He shall for all intents and purposes be civil servants except for the purpose of pension and gratuity in lieu of the same; he shall be entitled to receive contributory provident fund along with contribution made by Provincial Government to his account in the said fund in the prescribed manner. Provide further that in the events of death of civil servant before or after retirement his family shall be entitled to receive the said amount if it has already not been received by concerned deceased civil servant. If he accepts the appointment on the above cited terms and conditions he should report to this fail with 10 (ten) day of the receipt of this letter at his own expenses, in case he falls to join duty within same period the offer of appointment will be treated as cancelled /withdrawn.

Endst No 42/1-27

Copy of the above is forwarded to the:

1- Office Clerk/Accountant of District Lakki Marwat for Information.

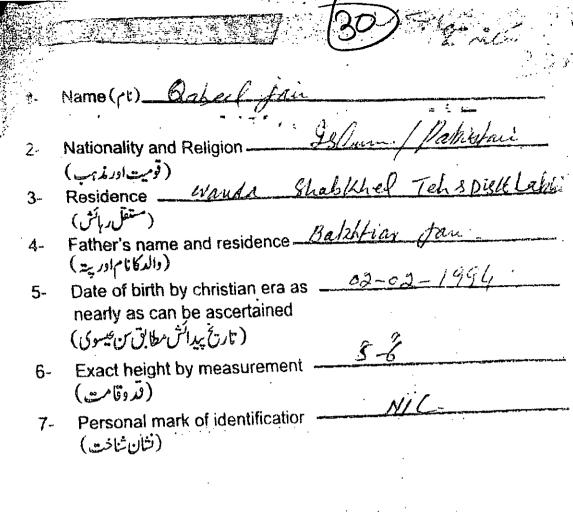
On arrival of the above named official an agreement deed should be taken on stamp paper to
effect that he has accepted all the terms and condition contained in the above offer letter of his
appointment and be submitted to this office for record.

Necessary entry of Para-II of terms and condition may also be made in his service book.

- 2- Mr Qabeel Jan son of Bakhtlar Jan R/o Wanda Shahab Khel at Mohallah Shero Khel Lakki city
- 3- The District Accounts Officer, Lakki Marwat for information and necessary action.

4- Office copy for record.

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(تقىدىق كننده افىرىكى شخطا دربير) Region Jan Lakki

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8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)

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10. Signature and designation of the Head of the Office or other Attesting officer

( تقدیق کننده افسر کے دستخط اور مہر)

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Note: The enteries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need no be taken after every 5 years under this rule.

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OFFICE OF THE SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT NO:

pated:

## REGISTER

Fo

Qabil Jan (Ex-Cook), District Jail Lakki Marwnt.

Subject: - RECOVERY OF SALARY FROM MR.QABIL JAN (EX-COOK), ATTACHED 03/2018 TO 10/2019.

Memo:

It is stated that you Qabil Jan (Ex-Cook), attached to this jail, have taken salary from this jail amounting to Rs. 546080/- through bogus appointment. You are hereby directed to deposit the said amount of Rs. 546080/- to the government treasury with in 7 days on the receipt of this notice, otherwise criminal/fraud case FIR will be register in your concerned area police station

SUPERINTENDENT

Endst: No. 300 Dated: 144/02/2020

Copy of the above is forwarded to the:-

1. The Inspector General of Pelsons Kligher Pakhunkhwa Peshawar for information and further direction pleases

2. The Ostrict Police Officer links Marwal for information with the request to recover the said amount through concerned police station from the above named person Cabit Jan.

DISTRICT JAIL LAKKI MARWAT



#### OFFICE OF THE SUPERINTENDENT DISTRICT JAIL LAKKI MARWAT

Email:districtjaillakkimarwat@gmail.com

No	49			_
Dated	1/4	/_	03	/ <u>2024</u>

#### OFFICE ORDER

In the light of Judgement of Khyber Pakhtunkhwa Service Tribunal Peshawar Judgment dated 04-10-2023 in Service Appeal No.938/2020, an Inquiry Committee was constituted by the order of Inspector General of Prisons Khyber Pakhtunkhwa Peshawar vide order No.38978 dated 23-10-2023 in order to verify the signature and genuineness of the resignation of Mr. Qabil Jan (Ex Cook). The committee pointed out during course of inquiry proceeding that appointment of the Qabil Jan (Ex-Cook) is fake and bogus and found no official record pertaining to his appointment (inquiry report annexed). Moreover, the appellant also refused to give specimen signatures to the inquiry committee for investigation by the Forensic Science Laboratory.

In view of the above, the undersigned being the competent authority agreed with the report/recommendation of inquiry committee received vide Inspector General of Prisons Khyber Pakhtunkhwa Peshawar letter No.13079/we dated 08-03-2024, that the appellant (Mr. Qabil Jan) was not an employee of Prison Department at all. Therefore, no question arises about his retaining into service, hence his Reinstatement Order issued vide this office order No.1895-98 dated 19/10/2023 is hereby withdrawn. Besides, request for lodging of FIR against Mr. Qabil Jan (Ex Cook) as well as against officers/officials at fault have been made to the quarter concerned. Moreover, departmental proceedings are also under process against the officers/officials at fault.

Endst No.

DISTRICT JAIL ŁAKKI MARWAT

Copy of the above is forwarded to: -

- 1. The Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar for information please.
- 2. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
  - 3. The District Accounts Officer Lakki Marwat for information please.

4. Mr.Qabil Jan resident of Wanda Shahab Khel, Mohallah Shero Khel District Lakki Marwat for information.

DISTRICT JAIL LAKKI MARWAT



OFFICE OF 1	THE
INSPECTORATE GENER	RAL OF PRISONS
KHYBER PAKHTUNKHWA	PESHAWAR
2091-9210334, 9210406	091-9213445

No	<u> </u>		
Dated _	٠,		

## **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/report 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 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