

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

In Service Appeal No. 886/2024

Ibrar Alam, (Ex-Warder) attached to District Jail Timergara -----(Appellant)

VERSUS

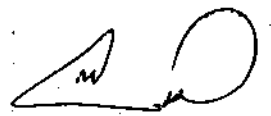
1. Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar.

2. Superintendent Circle Headquarters Prison, Mardan

----- (Respondents)

INDEX

S.N.	Description of Documents	Annexure	Pages
01.	Joint Para-wise comments	--	1-2
02.	Affidavit	--	3
03.	Application/Complaint	A	4-5
04.	IG Prison office letter dated 04/09/2023	B	6
05.	Superintendent District Jail Timergara office letter dated 15/09/2023	C	7
06.	Statement of Allegation and Charge Sheet dated 16/11/2023	D	8-9
07.	Inquiry Report alongwith statement of witnesses dated 06/01/2024	E	10-24
08.	Show Cause Notice dated 08/01/2024	F	15
09.	Impugned order dated 01/02/2024	G	16
10.	Departmental appeal dated 17/04/2024	H	17-19
11.	Final impugned order dated 24/05/2024	I	20-24



Deponent

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

In Service Appeal No. 886/2024

Ibrar Alam, (Ex-Warder) attached to District Jail Timergara----- (Appellant)

----VERSUS----

1. Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar.

2. Superintendent Circle Headquarters Prison, Mardan

----- (Respondents)

SUBJECT: JOINT PARA WISE COMMENTS OF RESPONDENTS No. 01 & 02

Respectfully Sheweth:-

Khyber Pakhtunkhwa
Service Tribunal

PRELIMINARY OBJECTION:

Diary No. 15703

Dated 11-09-2024

- i. That the present service appeal is incompetent in its present form.
- ii. That the appellant has got no locus standi to file the instant appeal.
- iii. That the appellant has stopped by his own conduct to file appeal.
- iv. That the appellant has not come to this Honorable Service Tribunal with clean hands.
- v. That the present appeal is bad for mis-joinder and non-joinder of necessary parties.
- vi. That the present appeal is badly Time-barred.
- vii. That the present appeal is not based on solid ground liable to be dismissed with cost.

FACTUAL OBJECTIONS

1. Admitted to the extent that the appellant was appointed as a Warder in Prisons Department in 2019 but soon after his induction, his conduct/character/attitude and behavior was not good and upto the satisfaction of the superior.
2. Incorrect and not admitted. The appellant was not sincere, devoted and hard worker in his duty and not performed his duty with punctuality and regularly and time and again created hurdles for the administration. That on 01/09/2023 the complainant namely Assam Ud Din lodged an application/complaint against the present appellant wherein he leveled allegation pertaining to misuse of the official authority of his own clash. Fabricated and fraudulent conduct **(Copy of complaint is enclosed as Annex-A)**. Accordingly, IG Prisons office letter dated 04/09/2023 intimated Superintendent District Jail Timergara and forward a copy of the said complaint with the direction to look into the matter and submit his views/comments/detail report based on facts to the office of IG Prisons for further necessary action **(Copy of letter is enclosed as Annex-B)**.
3. Detail of this Para is elaborated in Para-02 above.
4. Admitted to the extent that the Superintendent District Jail Timergara being an important part to the suit has neither been made as a party in the instant case was issued a letter No.1162 dated 15/09/2023 to the office of IG Prisons being respondent No1 in the instant case with the remarks that the department has no power or authority to settle personal dispute of an employee with private persons. So, it was suggested that the complainant may be asked to approach the competent forum for settling and deciding his monetary dispute under the law please **(Copy of letter is enclosed as Annex-C)**.
5. Incorrect and not admitted. The competent authority initiated disciplinary action against the present appellant and issued statement allegation on 16/11/2023 **(Copy enclosed as Annex-D)** and Mr. Riaz Ahmad Deputy Superintendent Central Prison Mardan was appointed/nominated as inquiry officer against the said accused with reference to the above allegation. Accordingly the inquiry officer submitted his finding/inquiry report to the respondent No.2 with the recommendation that the accused official is liable to be proceeded under the relevant rules ibid **(Inquiry report enclosed as Annex-E)**.

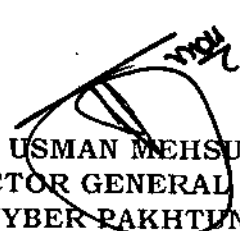
6. Incorrect and not admitted. Consequent upon the completion of inquiry proceedings the competent authority served upon him show cause notice dated 08/01/2024 (**copy enclosed as Annex-F**) against which he furnished his written reply/defense without any documentary proof/evidence which was found unsatisfactory.
7. Incorrect and not admitted. The competent authority after exhausting the codal formalities as laid down in the E&D Rules 2011 awarded him the major penalty in shape of Removal from Service with immediate effect to the accused official attached to District Jail Timergara for his misconduct/misuse of official status/impersonation/fraud vide Superintendent Circle Headquarter Prison Mardan office order dated 01/02/2024 (**copy enclosed as Annex-G**).
8. Subject to proof.
9. Subject to proof.
10. Admitted to the extent that appellant preferred his departmental appeal on 18/04/2024 before Inspector General of Prisons being the appellate authority against the impugned order ibid which was found barred by time and the decision of the competent authority was upheld and appeal of the appellant was rejected vide IG Prisons office order dated 24/05/2024 (**copy enclosed as Annex-H**). It is settled principle of Law that when a departmental appeal is barred before the departmental authority, service appeal before the Honorable Service Tribunal is also incompetent. Similarly, a case titled Sultan Ayaz Khan Vs Superintendent Headquarter Prison DI Khan etc in SA No.420/2011 (**copy enclosed**) was also dismissed as was hopelessly time barred.
11. No comments.

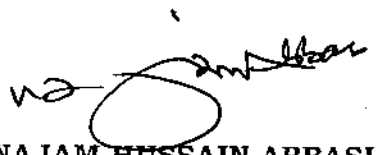
GROUND.

- A. Incorrect & misleading, the impugned orders dated 01/02/2024 and 24/05/2024 passed by the competent authority as well as by the appellate authority was lawful, justified and after exhausting all the codal formalities laid down in the E&D Rules 2011. No discrimination has been committed with the appellant.
- B. Detail of this Para is elaborated in Para-05 above.
- C. Detail of this Para is elaborated in Para-A above
- D. Incorrect and misleading. The inquiry officer recorded the statement of the present appellant as well as the order witnesses during course of inquiry proceedings, their statements are attached as **Annex-I**.
- E. Detail is this Para is elaborated in Para-02 above.
- F. Detail is this Para is elaborated in Para-A above.
- G. Detail is this Para is elaborated in Para-A above.
- H. Any other ground may also be raised at the time of arguments but subject to prior permission of Khyber Pakhtunkhwa Service Tribunal.

PRAYER.

Keeping in view the above mentioned facts/comments/submission, it is therefore most humbly prayed that on acceptance of these Para-wise comments on behalf of respondent No.1 and 2, the appeal of the appellant may kindly be dismissed with cost, being baseless and devoid of merit.


USMAN MEHSUD
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA
(Respondent No. 1)


NAJAM HUSSAIN ABBASI
SUPERINTENDENT
CIRCLE HEADQUARTER PRISON MARDAN
(Respondent No. 2)

SUPERINTENDENT
CIRCLE HEADQUARTER PRISON MARDAN

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

In Service Appeal No. 886/2024

Ibrar Alam, (Ex-Warder) attached to District Jail Timergara----- (Appellant)

----VERSUS----

1. Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar.
2. Superintendent Circle Headquarters Prisons, Mardan


----- (Respondents)

COUNTER AFFIDAVIT ON BEHALF OF RESPONDENTS NO.1 and 2

We, the following undersigned respondents do hereby solemnly affirm and declare on oath that the contents of the Reply/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 kept concealed from this Honorable Service Tribunal. We further state on oath that the answering respondents do not placed ex-parte nor their defense have been struck off.



USMAN MEHSUD
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA
(Respondent No. 1)



NAJAM HUSSAIN ABBASI
SUPERINTENDENT
CIRCLE HEADQUARTER PRISON MARDAN
(Respondent No. 2)

SUPERINTENDENT
CIRCLE NO. 3 PRISON MARDAN



04 SEP 2024

eminent
Inspector General (Prisons)
Khyber Pakhtunkhwa,
At Peshawar.

Subject: APPLICATION AGAINST IBRAR S/O ALAMZEB R/O VILLAGE DHERI DISTRICT DIR TALASH (CELL: 0305-9201524), INITIATE STRICT DEPARTMENT AS WELL AS LEGAL ACTION, IN THE BELOW DESCRIBE DETAIL MATTER, WHEREBY HE COMMITTED GROSS MIS-USE OF THE OFFICIAL AUTHORITY OF HIS OWN, AS CONSTABLE PRESENTLY AT DISTRICT JAIL, TIMERGARA.

R/S

With profound veneration, it is hereby submitting as below:

1. Applicant is the local inhabitant of the specified area of Qazi Abad Talash District Dir, an law abide, peace loving, strong believer of super messy of law in the region and all over the country.
2. Shortly as well precisely to the facts that the subject IBRAR is the co-villager of the applicant, and well informed about all the circumstances attached thereto with the to the applicant being fellow AND SINCE applicant was rather is unfortunately facing serious nature of his family disputes, with his family, in which certain efforts on behalf of the family members as well as local elders, extended but of no fruitful result at all. LASTLY rather eventually the subject official of your esteemed department came forward, with the purposal, for settlement of the above family dispute, with his due influence and over the department.
3. That the subject Ibrar disclosed his immense alleged links with the prominent law enforcement agencies of the state specially ISI, IB and MI and pretext to settle the matter by the applicant, however in this respect there are sufficient record is

Attached

Attached

Deputy Superintendant
Central Prison Mardan

BETTER COPY

To,

Eminent,
Inspector General of Prisons,
Khyber Pakhtunkhwa,
At Peshawar.

Subject: APPLICATION AGAINST IBRAR S/O ALAMZEB R/O VILLAGE DHERI DISTRICT DIR TALASH(CELL:0305-9201524),INITIATE STRICT DEPARTMENT AS WELL AS LEGAL ACTION,IN THE BELOW DESCRIBE DETAIL MATTER,WHEREBY HE COMMITTED GROSS MIS-USE OF THE OFFICIAL AUTHORITY OF HIS OWN,AS CONSTABLE PRESENTLY AT DISTRICT JAIL TIMERGARA.

R/S

With profound veneration, it is hereby submitting as below:

1. Applicant is the local inhabitant of the specified area of Qazi Abad Talash District Dir, an law abide, peace loving, strong believer of super messy of law in the region and all over the country.
2. Shortly as well precisely to the facts that the subject **IBRAR** is the co-villager of the applicant and well informed about all the circumstances attached thereto with the to the applicant being fellow **AND SINCE** applicant was rather is unfortunately being serious nature of his family disputes,with his family,in which certain efforts on behalf of the family members as well as local elders,extended but of no fruitful result at all.**LASTLY** rather eventually the subject official of your esteemed department came forward with the proposal for settlement of the above family dispute,with the purposal,for settlement of the above family dispute with his due influence all over the prison department.
3. That the subject Ibrar disclosed his immense alleged links with the prominent law enforcement agencies of the state specially ISI,IB and MI and pretext settle the matter for the applicant, however in this respect there are sufficient record is

available in the shape of Whatsapp and other text images, in evaluation of which, it could be easily determined about the false and concocted influence.

4. Turn to the crux of the matter, when he demanded certain heavy amount from the applicant, in response of which applicant time to time paid total amount of Rs.750000 cash to the subject Ibrar and later on he demanded and more from the applicant by disclosing his above unrealistic official influence.
5. Sir applicant as belonging to a middle class having not wide source of his income rather limited one and obtained rather barrowed the above amount from his fellows, for just bonafide get resolve from the family dispute, but it is very unfortunate to say that the subject culprit not only the betrayed to the applicant but also mis-use of his official authority, with the fabricated fraudulent conduct, hence applicant left no clue but to file or submit this applicant to invoked your departmental exclusive authority.

It is therefore, most humbly requested in the light of the above circumstances sketched in the seriated stanzas, stick-legal as well as departmental action may very kindly please be taken against the subject official your esteemed department and **CONSEQUENTLY** the payment so paid on behalf of the applicant Rs.750000 may also please be convenient to received accordingly.

Applicant

Attested

ASAM UDDIN
S/o Misbah Uddin
R/o Village Qazi Abad
District Lower Dir Talash
Cell 0342-9137600

کاپی فرورڈ کریں
ڈیپٹی سپرنٹنڈنٹ
سینٹرل پریزن مارشلز
لاہور

A
20-12-2023

Copy forward:

1. Chief Minister

Attested

Deputy Superintendent
Central Prison Marhal
98

Scanned with CamScanner

BETTER COPY

available in the shape of Whatsapp and other text images, in evaluation of which, it could be easily determined about the false and concocted influence.

4. Turn to the crux of the matter, when he demanded certain heavy amount from the applicant, in response of which applicant time to time paid total amount of Rs.750000 cash to the subject Ibrar and later on he demanded and more from the applicant by disclosing his above unrealistic official influence.
5. Sir applicant as belonging to a middle class having not wide source of his income rather limited one and obtained rather barrowed the above amount from his fellows, for just bonafide get resolve from the family dispute, but it is very fortunate to say that the subject culprit not only the betrayed to the applicant but also mis-use of his official authority, with the fabricated fraudulent conduct, hence applicant left no clue but to file or submit this applicant to invoked your departmental exclusive authority.

It is therefore, most humbly requested in the light of the above circumstances sketched in the seriated stanzas, stick legal as well as departmental action may very kindly please be taken against the subject official your esteemed department and **CONSEQUENLTY** the payment so paid on behalf of the applicant Rs.750000 may also please be convenient to received accordingly.

Applicant

ASAM UDDIN

S/o Misbah Uddin

R/o Village Qazi Abad

District Lower Dir Talash

Cell 0342-9137600

Deputy Superintendent
General Prison Alarday

Attended

DEPUTY DIRECTOR (E)
INSPECTOR GENERAL OF PRISONS
(KHYBER PAKHTUNKHWA PESHAWAR)

Copy of the above is forwarded to P.S. to Inspector General of Prisons for
information.

DEPUTY DIRECTOR (E)
INSPECTOR GENERAL OF PRISONS
(KHYBER PAKHTUNKHWA PESHAWAR)

Further necessary action

I am further directed to ask you to look into the matter and submit your views /
comments / detailed report based on facts within seven days positively to this office for
that S/O Muzzeb (Warden) posted at your job for information
submitted by Mr. Asan Uddin S/O Muzzeb (Warden) resident of District Lower Dir against Mr.
I am directed to refer to the subject and to forward herewith a copy of a complaint

APPLICATION / COMPLAINT

The type required
Must be in English

INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
10/11/2017
10/11/2017

BETTER COPY



**OFFICE OF THE
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
091-9210334, 921040609 091-9213445**

To,

The Superintendent,
District Jail Timergara.

Subject: **APPLICATION/COMPLAINT**

Memo:

I am directed to refer to the subject and to forward herewith a copy of a complaint submitted by Mr.Asam Uddin S/O Mis bah Uddin resident of District Lower Dir against Mr.Ibrar S/O Alamzeb (Warder) posted at your jail for information.

I am further directed to ask you to look into the matter and submit your views/comments/detailed report based on facts **within seven days positively** to this office for further necessary action.

**DEPUTY DIRECTOR (E)
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

ENDST: NO _____/-

Copy of the above is forwarded to P.S to Inspector General of Prisons for information.

**DEPUTY DIRECTOR (E)
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

D

OFFICE OF THE
SUPERINTENDENT
DISTRICT JAIL, TIMERGARA
Phone/Fax: 0945-9250095
Email: districtjailtimergara@gmail.com

No. 1162-WE Dated: 15/09/2023.

The Inspector General of Prisons,
Khyber Pakhtunkhwa, Peshawar.

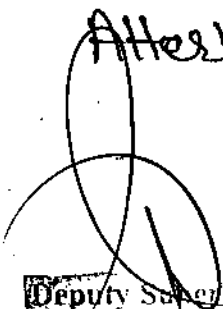
Subject: APPLICATION/COMPLAINT

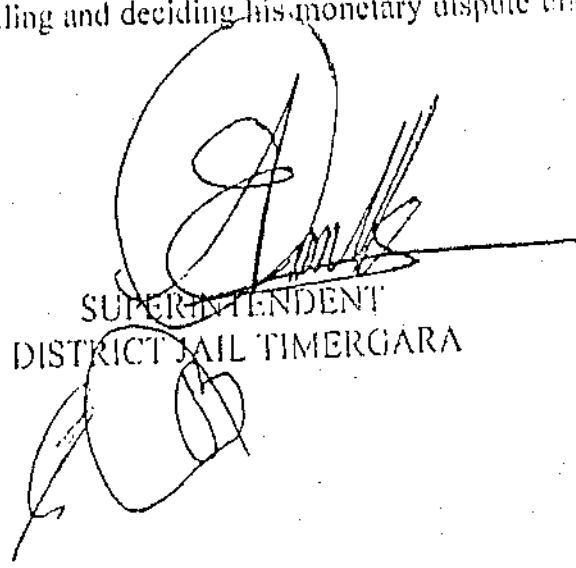
& Sir,

Reference yours office letter No. 32249/WE dated 04.09.2023

Enclosed please find herewith a written statement, in original, obtained from Warden (BPS-07) Ibrar Alam S/o Alam Zeb attached to this jail for kind information and further necessary action with the submission that statement of complainant and of warden concerned are contradictory to each other without any evidence and any proof presented or provided by both the parties.

It is further submitted that the Department has no power or authority to settle personal disputes of an employee with private persons. The warden can be proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules 2011, when a criminal case is registered against him by the complainant in the court of law. So, the complainant may be asked to approach a competent forum for settling and deciding his monetary dispute under the law please.

Attested

Deputy Superintendent
Central Prison Mardan
8/6


SUPERINTENDENT
DISTRICT JAIL TIMERGARA

BETTER COPY

**OFFICE OF THE
SUPERINTENDENT
DISTRICT JAIL TIMERGARA**

Phone/Fax : 0935-9250095
Email:districtjailtiemrgara@gmail.com

No. 1162-WE Dated 16/09/2023

To,

The Inspector General of Prisons,
Khyber Pakhtunkhwa, Peshawar.

Subject: **APPLICATION/COMPLAINT**

R/Sir,

Reference yours office letter No.32249/WE dated 04.09.2023

Enclosed please find herewith a written statement, in original, obtained from Warder (BPS-07) **Ibrar Alam S/o Alam Zeb** attached to this jail for kind information and further necessary action with the submission that statement of complainant and of warder concerned are contradictory to each other without any evidence and any proof presented or provided by both the parties.

It is further submitted that the Department has no power or authority to settled personal disputes of an employee with private persons. The warder can be proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules 2011, when a criminal case is registered against him by the complainant in the court of law, So, the complainant may be asked to approach a competent forum for selling and deciding his monetary dispute under the law please.

**SUPERINTENDENT
DISTRICT JAIL TIMERGARA**

DISCIPLINARY ACTION.

I, Superintendent, Circle Headquarter Prison Mardan, as competent authority, am of the opinion that **Warder (BPS-07) Ibrar Alam S/O Alamzeb** attached to District Jail Timergara has rendered himself liable to be proceeded against as he committed the following acts/omission within the meaning of rule 3 of the of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011.

STATEMENT OF ALLEGATIONS.

"An application has been received through WhatsApp from the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar dated 25.09.2023 submitted by Mr. Assam Uddin S/O Misbah Uddin R/O Village Qazi Abad, District Lower Dir Talash (Cell No. 0342-9137600) against Warder Ibrar Alam S/O Alamzeb attached to District Jail Timergara.

A facts finding inquiry was initiated against the said Warder and Mr. Naveed Iqbal, Assistant Superintendent Cum-Deputy Superintendent Sub Jail Dir Upper was appointed as inquiry officer to ascertain the facts in the instant case, accordingly he furnished the inquiry report and his findings vide his office letter No. 2010/WE dated 19.10.2023 which are as under:-

After going through the relevant record and statements of all concerned, it has been observed and found that:-


1. Applicant produced three witnesses namely Javed, Muhammad Sadiq and Abid Khan for amount four lac (400000) rupees.
2. Applicant produced witnesses that Warder Ibrar went with him to Islamabad and there they met with intelligence Bureau Director.
3. Applicant produced WhatsApp voice and text messages as evidence, which needs further verification / authenticity that either these messages are authentic or fake.
4. The Applicant Assam Uddin produce three witnesses for amount Rs. 400000/- and presented Easypaisa message for amount Rs. 30000/- as evidence,
5. Warder Ibrar failed to provide any witness or evidence for his claiming amount i.e. ten lac rupees.
6. Warder Ibrar has provided an opportunity to present his witness/ evidence by Monday at (09/10/2023) but he failed to provide any evidence or witnesses."

Mr. Riaz Ahmad, Deputy Superintendent Central Prison Mardan is hereby appointed as Inquiry Officer against the said accused Warder with reference to the above allegations, under rule 10(1)(a) of the ibid rules.

The Inquiry Officer shall in accordance with the provision of the ibid rules, provide a reasonable opportunity of hearing to the accused, record his findings and make within sixty days (60) of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.

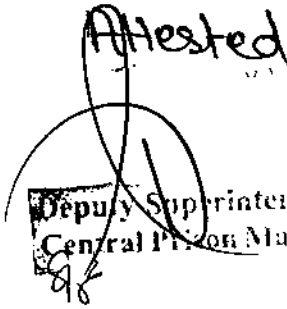
Mr. Muhammad Ismail Khan, Assistant Superintendent District Jail Timergara is hereby nominated as Departmental representative. He and the accused officials shall join the proceedings on the date, time and place fixed by the Inquiry Officer.


Endst No. 3238-113/- Dated: 16/11/2023.


SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN

Copy of the above is forwarded to:-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
2. Mr. Riaz Ahmad, Deputy Superintendent Central Prison Mardan (Inquiry Officer) for initiating proceedings against the above named Warder under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011.
3. The Superintendent District Jail Timergara for information and necessary action. Charge sheet in duplicate is sent herewith. One copy of the same duly signed and dated by the above named official may be returned to this office in token of its receipt.
4. Mr. Muhammad Ismail Khan, Assistant Superintendent District Jail Timergara for information. He is directed to produce all relevant record on the date and time fixed by the Inquiry Officer.
5. The above named Warder C/O Superintendent District Jail Timergara with the direction to appear before the Inquiry Officer for the purpose of Inquiry proceedings.
6. Mr. Assam Uddin S/O Misbah Uddin R/O Village Qazi Abad, District Lower Dir Talash. (Cell No. 0342-9137600), for information.

Attested

Deputy Superintendent
Central Prison Mardan


SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN

CHARGE SHEET

I, Muhammad Arif Khan (BPS-18), Superintendent Circle Headquarter Prison Mardan, as competent authority, hereby charge you Warder (BPS-07) Ibrar Alam S/O Alamzeb attached to District Jail Timergara as under.

As per report of Superintendent Sub Jail Dir Upper:-

"An application has been received through WhatsApp from the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar dated 25.09.2023 submitted by Mr. Assam Uddin S/O Misbah Uddin R/O Village Qazi Abad, District Lower Dir Talash (Cell No. 0342-9137600) against you.

A facts finding inquiry was initiated against you and Mr. Naveed Iqbal, Assistant Superintendent Cum-Deputy Superintendent Sub Jail Dir Upper was appointed as inquiry officer to ascertain the facts in the instant case, accordingly he furnished the inquiry report and his findings vide his office letter No. 2010/WE dated 19.10.2023 which are as under:-

Findings:-
After going through the relevant record and statements of all concerned, it has been observed and found that:-

7. Applicant produced three witnesses namely Javed, Muhammad Sadq and Abid Khan for amount four lac (400000) rupees.
8. Applicant produced witnesses that you went with him to Islamabad and there you met with intelligence Bureau Director.
9. Applicant produced WhatsApp voice and text messages as evidence, which needs further verification / authenticity that either these messages are authentic or fake.
10. The Applicant Assam Uddin produce three witnesses for amount Rs. 400000/- and presented Easypaisa message for amount Rs. 30000/- as evidence,
11. You failed to provide any witness or evidence for your claiming amount i.e. ten lac rupees.
12. You have provided an opportunity to present your witness / evidence by Monday at 09/10/2023 but you failed to provide any evidence or witnesses."

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

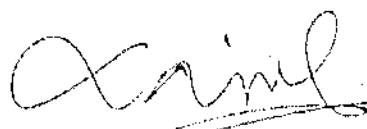
Therefore you are required to submit your written defense if any within ten (10) days of the receipt of this Charge Sheet to the inquiry officer.

- 1- Your written defense, if any, should reach to the inquiry officer within the specified period, failing which it shall be presumed that you have nothing in your defense and in that case Ex-Parte action shall be taken against you.
- 2- Intimate whether you desire to be heard in person.
- 3- A Statement of allegations is enclosed.

Arrested

**Deputy Superintendent
Central Prison Mardan**

8/6


SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN



OFFICE OF THE
SUPERINTENDENT
CENTRAL PRISON MARDAN

0937-843114

E-Mail: mardanjail@gmail.com.

No. 217-6/PB Dated: 06/01/2024

To,

The Superintendent
Circle Headquarter Prisons Mardan.

Subject: **DISCIPLINARY ACTION/INQUIRY.**

R/Sir,

Reference to your good office letter Endst No. 3238-43 dated 16.11.2023 on the subject noted above.

I enclosed herewith my inquiry report consisting of five (05) pages along with relevant annexure "A" to "L" for favour of further disposal, please.

Riaz Ahmad (Inquiry Officer)
DEPUTY SUPERINTENDENT
CENTRAL PRISON MARDAN

Supdt
06-01-24

Date 04/01/24

Attested

Deputy Superintendent
Central Prison Mardan
818

To,
The Superintendent,
Circle Headquarter Prison Mardan.

Subject: DISCIPLINARY ACTION/INQUIRY.

R/Sir;

Reference to your office letter Endst No. 3238-43 dated 16-11-2023 on the subject noted above.

As per complaint submitted by Mr. Assam Uddin S/O Misbah Uddin R/O Village Qazi Abad District Dir Lower Talash. The competent authority has appointed the undersigned as inquiry officer. In light of the above mentioned order, the undersigned called the accused official and the applicant along with record and witnesses to Central Prison Mardan on 20.12.2023 to conduct the inquiry. Inquiry of the said accused warder is conducted in Central Prison Mardan on 20.12.2023. Findings and recommendations are as under.

ACTUAL CASE (INSIDE STORY):

Complainant Assam Uddin took the services of accused Warder Ibrar Alam for resolving his family issues. Responding to his family issues, Assam Uddin told that his wife alongwith two kids is disappeared by his step brother in law since long and he had no idea about their whereabouts. In order to trace out their location, complainant Assam Uddin approached accused Warder Ibrar Alam. Warder Ibrar Alam pledged to resolve the issue through intelligence agencies for consideration of money. Accused Warder Ibrar Alam received Rupees seven lacs and fifty thousand (7,50,000) from complainant Assam Uddin as per his statement. According to Assam Uddin, he is betrayed by accused Warder Ibrar Alam and hence he approached Prison Department to look into the matter.

STATEMENT OF APPLICANT ASSAM UDDIN:

Mr. Assam Uddin upheld his complaint forwarded to Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar (**Attached as annex-A**)

CROSS EXAMINATION:

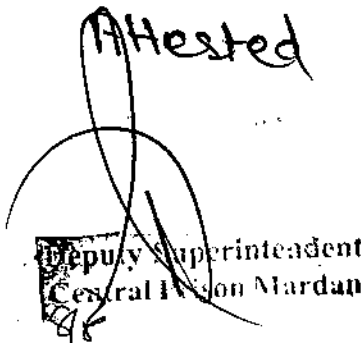
As per questionnaire of Mr. Assam Uddin (**Attached as annex-B**), he had acquaintance with Warder Ibrar Alam through Mr. Rahat. Mr. Rahat introduced Warder Ibrar as an employee in District Jail Timergara. Further, Mr. Rahat added that it seems that Warder Ibrar also works for intelligence and he will sort out your problems. Assam Uddin added that He visited Ibrar Alam's house occasionally. As per reply of Assam Uddin he told that for a couple of time Rahat and Abid were also accompanying me during visit to Ibrar Alam's house. According to Assam Uddin, on that very day Ibrar Alam took Rupees Four Lacs (400,000) from me in presence of Abid. Abid accompanied me from Swat to Talaash in black color crown car. Thereafter, we proceeded to Sakhakot where Abid left us and, I and Ibrar Alam moved to Islamabad in XLI Corolla to meet so called Director General (DG) for resolving my issue.

Moreover, I never asked Ibrar Alam about his job. Yet he told me that he is Assistant Director in IB. While asking Assam Uddin that why he didn't approach legal forum to sue Warder Ibrar Alam for this fraud, Mr. Assam couldn't reply. Furthermore, Assam told that he never borrowed Rupees Ten Lacs (10, 00,000) from Ibrar's brother namely Naseer Alam as claimed by Ibrar Alam.

I am demanding for Rupees Seven Lacs and Fifty Thousand (7, 50,000) from Warder Ibrar which he deceived me for resolving my family matter.

STATEMENT OF WITNESS JAVED:

Mr. Javed upheld his previous statement recorded by Mr. Naveed Iqbal Assistant Superintendent Sub Jail Dir Upper. (**Attached as annex-C**)

Attested

Deputy Superintendant
Central Prison Mardan

Scanned with CamScanner

To,

The Superintendent,
Circle Headquarter Prison Mardan.

Better Copy

Subject: DISCIPLINARY ACTION/INQUIRY.

R/Sir;

Reference to your office letter Endst No. 3238-43 dated 16-11-2023 on the subject noted above.

As per complaint submitted by Mr. Assam Uddin S/O Misbah Uddin R/O Village Qazi Abad District Dir Lower Talash. The competent authority has appointed the undersigned as inquiry officer. In light of the above mentioned order, the undersigned called the accused official and the applicant along with record and witnesses to Central Prison Mardan on 20.12.2023 to conduct the inquiry. Inquiry of the said accused warder is conducted in Central Prison Mardan on 20.12.2023. Findings and recommendations are as under.

ACTUAL CASE (INSIDE STORY):

Complainant Assam Uddin took the services of accused Warder Ibrar Alam for resolving his family issues. Responding to his family issues, Assam Uddin told that his wife alongwith two kids is disappeared by his step brother in law since long and he had no idea about their whereabouts. In order to trace out their location, complainant Assam Uddin approached accused Warder Ibrar Alam. Warder Ibrar Alam pledged to resolve the issue through intelligence agencies for consideration of money. Accused Warder Ibrar Alam received Rupees seven lacs and fifty thousand (7,50,000) from complainant Assam Uddin as per his statement. According to Assam Uddin, he is betrayed by accused Warder Ibrar Alam and hence he approached Prison Department to look into the matter.

STATEMENT OF APPLICANT ASSAM UDDIN:

Mr. Assam Uddin upheld his complaint forwarded to Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar (**Attached as annex-A**)

CROSS EXAMINATION:

As per questionnaire of Mr. Assam Uddin (**Attached as annex-B**), he had acquaintance with Warder Ibrar Alam through Mr. Rahat. Mr. Rahat introduced Warder Ibrar as an employee in District Jail Timergara. Further, Mr. Rahat added that it seems that Warder Ibrar also works for intelligence and he will sort out your problems. Assam Uddin added that He visited Ibrar Alam's house occasionally. As per reply of Assam Uddin he told that for a couple of time Rahat and Abid were also accompanying me during visit to Ibrar Alam's house. According to Assam Uddin, on that very day Ibrar Alam took Rupees Four Lacs (400,000) from me in presence of Abid. Abid accompanied me from Swat to Talaash in black color crown car. Thereafter, we proceeded to Sakhakot where Abid left us and, I and Ibrar Alam moved to Islamabad in XLI Corolla to meet so called Director General (DG) for resolving my issue.

Moreover, I never asked Ibrar Alam about his job. Yet he told me that he is Assistant Director in IB. While asking Assam Uddin that why he didn't approach legal forum to sue Warder Ibrar Alam for this fraud, Mr. Assam couldn't reply. Furthermore, Assam told that he never borrowed Rupees Ten Lacs (10, 00,000) from Ibrar's brother namely Naseer Alam as claimed by Ibrar Alam.

I am demanding for Rupees Seven Lacs and Fifty Thousand (7, 50,000) from Warder Ibrar which he deceived me for resolving my family matter.

STATEMENT OF WITNESS JAVED:

Mr. Javed upheld his previous statement recorded by Mr. Naveed Iqbal Assistant Superintendent Sub Jail Dir Upper. (**Attached as annex-C**)

CROSS EXAMINATION:

As per questionnaire of Mr. Javed (**Attached as annex-D**) that while on telephonic conversation with Mr. Assam, he withdrew Rupees Four lacs from Allied Bank Balambat Branch Timergara and handed over the same amount to Mr. Sadiq in Timergara that was to be received by Mr. Assam Uddin at Talaash.

STATEMENT OF WITNESS MUHAMMAD SADIQ:

Mr. Muhammad Sadiq upheld his previous statement recorded by Mr. Naveed Iqbal Assistant Superintendent Sub Jail Dir Upper. (**Attached as annex-E**)

CROSS EXAMINATION:

As per questionnaire of Mr. Muhammad Sadiq (**Attached as annex-F**) I am working as salesperson in Mr. Assam's shop located in village Talaash. I received Rupees 400,000 from Mr. Javed in Timergara on directions of Mr. Assam. I handed over the same amount to Mr. Assam in Talaash. Mr. Assam came to Talaash from Swat in black color crown car. Furthermore, he told that I don't know Warder Ibrar.

STATEMENT OF WARDER ABDULLAH S/O MUHAMMAD ALI JAN R/O MUNDA, KHADI KHELA, TEHSIL SAMAR BAGH, DISTRICT LOWER DIR:


As per statement of Warder Abdullah (**Attached as annex-G**) I joined Prison Department as warder on 17th August 2022. I am acquainted with Warder Ibrar for the past 10 months. I am using an easypaisa account since two years. Amongst the two brothers Ibrar Alam and Naseer Alam, my easypaisa account number was given to an anonymous person by one of them; in order to receive amount Rupees Thirty thousand (30,000). On 27.02.2023, I received Rupees Thirty thousand (30,000) through easypaisa. I withdrew money from easypaisa account and handed over Rupees Thirty Thousand (30,000) to Naseer Alam in presence of Ibrar Alam. Apart from this, I had never done any transaction neither with Ibrar Alam nor his brother Naseer Alam.

CROSS EXAMINATION:

Warder Abdullah was cross examined. Questionnaire is attached as (**annex-H**) Replying to question No. 1 that how does he know Warder Ibrar Alam? Warder Abdullah replied that he is my fellow and they are serving in District Jail Timergara. They know each other from the past ten months. Ref to Question No. 2, that who is Naseer Alam and since how long do you know him? Abdullah told that Naseer Alam is brother of Warder Ibrar Alam and know him through Ibrar Alam. Ref to question No. 3, that who transferred amount Rupees Thirty Thousand (30,000) to your account? Abdullah couldn't reply for that. Replying to question No. 4, Abdullah handed over amount Rupees Thirty Thousand (30,000) to Naseer Alam in presence of Ibrar Alam. Replying to question No. 5, Abdullah expressed that I and Ibrar were sitting in park outside Jail. Ibrar told that you will receive amount Rupees Thirty Thousand (30,000). Replying to question No. 6, Abdullah told that I don't know exactly who forwarded my easypaisa number to the sender to receive money. Replying to question No. 7, he stated that I had never contacted Naseer Alam on phone. As per reply of question No. 8, Abdullah told that I got no benefits from that transaction. Replying to question No. 9, Abdullah told that Ibrar Alam gave my account number to the sender. I don't know why he gave my account number. Replying to question No. 10, Abdullah expressed that I use my easypaisa account for personal day to day business. Replying to question No. 11, Abdullah confessed that I handed over Rupees Thirty Thousand (30,000) in cash to Ibrar Alam and Naseer Alam.

STATEMENT OF ACCUSED WARDER IBRAR ALAM:

Warder Ibrar Alam stated on the oath attached as (**annex-I**) that the witnesses produced by the complainant Assam Uddin are unknown to me. I didn't travel to Islamabad before any witness and neither I know any agency's director. There is no witness for Rupees Four Lacs (400,000) and neither I received money through my easypaisa account. If there is any transaction, it should be proved against me. I didn't claim Rupees Ten Lacs (10, 00,000), therefore, I don't need to produce any witness or evidence; as this matter solely pertains to my brother and Assam Uddin. I request the stack holders of my department that it is a

Attested

Deputy Superintendent
Central Prison Mardan

Better Copy

CROSS EXAMINATION:

As per questionnaire of Mr. Javed (**Attached as annex-D**) that while on telephonic conversation with Mr. Assam, he withdrew Rupees Four lacs from Allied Bank Balambat Branch Timergara and handed over the same amount to Mr. Sadiq in Timergara that was to be received by Mr. Assam Uddin at Talaash.

STATEMENT OF WITNESS MUHAMMAD SADIQ:

Mr. Muhammad Sadiq upheld his previous statement recorded by Mr. Naveed Iqbal Assistant Superintendent Sub Jail Dir Upper. (**Attached as annex-E**)

CROSS EXAMINATION:

As per questionnaire of Mr. Muhammad Sadiq (**Attached as annex-F**) I am working as salesperson in Mr. Assam's shop located in village Talaash. I received Rupees 400,000 from Mr. Javed in Timergara on directions of Mr. Assam. I handed over the same amount to Mr. Assam in Talaash. Mr. Assam came to Talaash from Swat in black color crown car. Furthermore, he told that I don't know Warder Ibrar.

STATEMENT OF WARDER ABDULLAH S/O MUHAMMAD ALI JAN R/O MUNDA, KHADI KHELA, TEHSIL SAMAR BAGH, DISTRICT LOWER DIR:

As per statement of Warder Abdullah (**Attached as annex-G**) I joined Prison Department as warder on 17th August 2022. I am acquainted with Warder Ibrar for the past 10 months. I am using an easypaisa account since two years. Amongst the two brothers Ibrar Alam and Naseer Alam, my easypaisa account number was given to an anonymous person by one of them; in order to receive amount Rupees Thirty thousand (30,000). On 27.02.2023, I received Rupees Thirty thousand (30,000) through easypaisa. I withdrew money from easypaisa account and handed over Rupees Thirty Thousand (30,000) to Naseer Alam in presence of Ibrar Alam. Apart from this, I had never done any transaction neither with Ibrar Alam nor his brother Naseer Alam.

CROSS EXAMINATION:

Warder Abdullah was cross examined. Questionnaire is attached as (**annex-H**) Replying to question No. 1 that how does he know Warder Ibrar Alam? Warder Abdullah replied that he is my fellow and they are serving in District Jail Timergara. They know each other from the past ten months. Ref to Question No. 2, that who is Naseer Alam and since how long do you know him? Abdullah told that Naseer Alam is brother of Warder Ibrar Alam and know him through Ibrar Alam. Ref to question No. 3, that who transferred amount Rupees Thirty Thousand (30,000) to your account? Abdullah couldn't reply for that. Replying to question No. 4, Abdullah handed over amount Rupees Thirty Thousand (30,000) to Naseer Alam in presence of Ibrar Alam. Replying to question No. 5, Abdullah expressed that I and Ibrar were sitting in park outside Jail. Ibrar told that you will receive amount Rupees Thirty Thousand (30,000). Replying to question No. 6, Abdullah told that I don't know exactly who forwarded my easypaisa number to the sender to receive money. Replying to question No. 7, he stated that I had never contacted Naseer Alam on phone. As per reply of question No. 8, Abdullah told that I got no benefits from that transaction. Replying to question No. 9, Abdullah told that Ibrar Alam gave my account number to the sender. I don't know why he gave my account number. Replying to question No. 10, Abdullah expressed that I use my easypaisa account for personal day to day business. Replying to question No. 11, Abdullah confessed that I handed over Rupees Thirty Thousand (30,000) in cash to Ibrar Alam and Naseer Alam.

STATEMENT OF ACCUSED WARDER IBRAR ALAM:

Warder Ibrar Alam stated on the oath attached as (**annex-I**) that the witnesses produced by the complainant Assam Uddin are unknown to me. I didn't travel to Islamabad before any witness and neither I know any agency's director. There is no witness for Rupees Four Lacs (400,000) and neither I received money through my easypaisa account. If there is any transaction, it should be proved against me. I didn't claim Rupees Ten Lacs (10,00,000), therefore, I don't need to produce any witness or evidence; as this matter solely pertains to my brother and Assam Uddin. I request the stack holders of my department

criminal gang who blackmails people and grab money. You're requested to have mercy upon me and resolve this issue as this is entirely a private issue between Assam Uddin and my brother. I am discharging my duties with responsibility and honesty.

CROSS EXAMINATION:

As per questionnaire (Attached as annex-J) of accused warder Mr. Ibrar, he denied of the charges levelled against him by Assam Uddin. He added that I never took a penny from Mr. Assam Uddin and neither I impersonated myself as Assistant Director in IB. Further he added that the WhatsApp voice notes presented by Assam Uddin to the inquiry team are fake. However, I contacted Mr. Assam Uddin twice through WhatsApp to ask his wellbeing. When asked to produce any evidence about that Assam Uddin has borrowed Rs. 10,00,000 (Ten lacs) from his brother Naseer Alam, he replied that he didn't need to produce any evidence as it is a private matter between Assam Uddin and Naseer Alam. He further suggested that Assam Uddin should approach concerned court of law for resolution of his matter with Naseer Alam.

ANALYSIS OF WHATSAPP VOICE RECORDS:

Relevant record of WhatsApp voice notes and a tiktok video were thoroughly examined by the under signed. The cellular numbers used in voice chat presented by Assam Uddin belonged to complainant Assam Uddin and accused Ibrar Alam (Attached as annex-K). The voice chats were examined by a panel of Assistant Superintendents assisting the undersigned in inquiry. Various samples of voice were recorded from both the complainant and accused. The accent in freshly recorded voice notes duty matched with the voice messages provided by complainant Assam Uddin to the inquiry officer.

In one of the voice notes accused Warder Ibrar Alam consoles complainant Assam Uddin after hearing his family issue and advises not to involve police into the matter. Accused Warder Ibrar Alam urges that our capability of accomplishing tasks is twofold compared to others/police. Moreover, accused Warder Ibrar Alam says that he bears old relationship with them (Intelligence) based on mutual trust and that he discharges his duties with them (Intelligence).

Regarding complainant Assam Uddin family matter, accused Warder Ibrar Alam assures him that he has tackled his matter with them (Intelligence) downtown.

In one of the voice note, accused Ibrar Alam is asking Assam Uddin whether to provide him UBL account or easypaisa account. Secondly, after receiving amount, accused Ibrar Alam extends thanks to Assam Uddin and confirms the transaction.

Throughout the voice notes, it was insisted by accused Ibrar Alam to keep the deal/matter as secret one. Accused Ibrar Alam mentioned the terms DG office, CCPO, Commandant, DIG, DPO, Brigadier, Colonel, secrecy, sensitive place etc in the voice notes. In one of the voice notes he used the word "Mashar" for his boss.

Similarly, in the exchanged voice notes, visit to Islamabad was planned to meet DG and the convenience they would use to go to Islamabad was discussed as well. In order to keep the matter secret, Warder Ibrar Alam stressed not to take driver during their trip to Islamabad. Moreover, before their departure to Islamabad, Assam Uddin assures accused Ibrar Alam that his "Amanat" is with him. That "Amanat" refers to money for accused Ibrar Alam.

In the last voice notes, complainant Assam Uddin is repeatedly asking accused Warder Ibrar Alam about the assigned task (family issue). Ibrar Alam is reluctant and rarely replies to complainant Assam Uddin. In one of the reply through WhatsApp voice notes accused warder Ibrar Alam Says to Assam Uddin that his matter is delayed due to recent chaos created by PTI supporters (referring to 09th May 2023 incident) and that they are busy in handling the situation/crises. Assam Uddin is urging that he has fulfilled all the demands of accused Warder Ibrar Alam and it is now his turn to get complainant's matter resolved. Responding to Assam Uddin, accused warder Ibrar Alam revealed that the amount was only Twenty Lacs (20, 00000) will further be needed. From the voice notes it is observed that the relationship between complainant Assam Uddin and Warder Ibrar Alam got worsened.

Attested

Scanned with CamScanner

Deputy Superintendent
Central Prison Mardan

8/6

Better copy

that it is a criminal gang who blackmails people and grab money. You're requested to have mercy upon me and resolve this issue as this is entirely a private issue between Assam Uddin and my brother. I am discharging my duties with responsibility and honesty.

CROSS EXAMINATION:

As per questionnaire **(Attached as annex-J)** of accused warder Mr. Ibrar, he denied of the charges levelled against him by Assam Uddin. He added that I never took a penny from Mr. Assam Uddin and neither I impersonated myself as Assistant Director in IB. Further he added that the whatsapp voice notes presented by Assam Uddin to the inquiry team are fake. However, I contacted Mr. Assam Uddin twice through WhatsApp to ask his wellbeing. When asked to produce any evidence about that Assam Uddin has borrowed Rs. 10,00,000 (Ten lacs) from his brother Naseer Alam, he replied that he didn't need to produce any evidence as it is a private matter between Assam Uddin and Naseer Alam. He further suggested that Assam Uddin should approach concerned court of law for resolution of his matter with Naseer Alam.

ANALYSIS OF WHATSAPP VOICE RECORDS:

Relevant record of WhatsApp voice notes and a tiktok video were thoroughly examined by the under signed. The cellular numbers used in voice chat presented by Assam Uddin belonged to complainant Assam Uddin and accused Ibrar Alam **(Attached as annex-K)**. The voice chats were examined by a panel of Assistant Superintendents assisting the undersigned in inquiry. Various samples of voice were recorded from both the complainant and accused. The accent in freshly recorded voice notes duty matched with the voice messages provided by complainant Assam Uddin to the inquiry officer.

In one of the voice notes accused Warder Ibrar Alam consoles complainant Assam Uddin after hearing his family issue and advises not to involve police into the matter. Accused Warder Ibrar Alam urges that our capability of accomplishing tasks is twofold compared to others/police. Moreover, accused Warder Ibrar Alam says that he bears old relationship with them (Intelligence) based on mutual trust and that he discharges his duties with them (Intelligence).

Regarding complainant Assam Uddin family matter, accused Warder Ibrar Alam assures him that he has tackled his matter with them (Intelligence) downtown.

In one of the voice note, accused Ibrar Alam is asking Assam Uddin whether to provide him UBL account or easypaisa account. Secondly, after receiving amount, accused Ibrar Alam extends thanks to Assam Uddin and confirms the transaction.

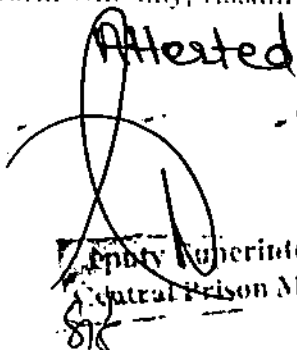
Throughout the voice notes, it was insisted by accused Ibrar Alam to keep the deal/matter as secret one. Accused Ibrar Alam mentioned the terms DG office, CCPO, Commandant, DIG, DPO, Brigadier, Colonel, secrecy, sensitive place etc in the voice notes. In one of the voice notes he used the word "Mashar" for his boss.

Similarly, in the exchanged voice notes, visit to Islamabad was planned to meet DG and the convenience they would use to go to Islamabad was discussed as well. In order to keep the matter secret, Warder Ibrar Alam stressed not to take driver during their trip to Islamabad. Moreover, before their departure to Islamabad, Assam Uddin assures accused Ibrar Alam that his "Amanat" is with him. That "Amanat" refers to money for accused Ibrar Alam.

In the last voice notes, complainant Assam Uddin is repeatedly asking accused Warder Ibrar Alam about the assigned task (family issue). Ibrar Alam is reluctant and rarely replies to complainant Assam Uddin. In one of the reply through whatsapp voice notes accused warder Ibrar Alam Says to Assam Ud Din that his matter is delayed due to recent chaos created by PTI supporters (referring to 9th May 2023 incident) and that they are busy in handling the situation/crises. Assam Uddin is urging that he has fulfilled all the demands of accused Warder Ibrar Alam and it is now his turn to get complainant's matter resolved. Responding to Asam Ud Din, accused warder Ibrar Alam revealed that the amount was only for tracing the location. If the wants physical hands over of his kids, an amount of Rupees Twenty Lacs (20, 00000) will further be needed. From the voice notes it

FINDINGS/FACTS:

1. The examined voice notes conversed between accused Warder Ibrar Alam and complainant Assam Uddin apparently depicts that these notes belong to these two, yet for authentication these voice notes need a forensic.
2. Though the accused Warder Ibrar Alam didn't disclose his identity as Assistant Director (IB) in voice notes but he is persistently directing Assam Uddin to keep the matter as secret one and not reveal in public which shows his impersonation. The above used words (given in record) prima facie leads to accused Ibrar Alam's impersonation as if he is working for some intelligence agency. Also he is persistently saying in voice notes that I am busy in official meetings.
3. Mr. Abid, the previous eye witness of Rupees Four Lacs (400,000) examined by inquiry officer Naveed Iqbal Assistant Superintendent Sub Jail Dir Upper, has departed for KSA. Remaining two witnesses (Javed and Sadiq) for Rupees Four Lacs (400,000) were cross examined and they stuck to their statements recorded in previous inquiry. Javed told that I withdrew amount Rupees Four Lacs (400,000) for Assam Uddin and handed over to Sadiq so that Assam Uddin may receive it at Talaash. Till now it shows that this amount was meant to be delivered to the accused Warder Ibrar Alam. As in the exchanged voice notes between Assam Uddin and Ibrar Alam, Assam Uddin assures Ibrar Alam before departure to Islamabad that his "Amanat" (Money) is with him.
4. Accused Warder Ibrar Alam is expressly showing unfamiliarity with the witness Abid in his statement produced before the undersigned. But in his voice chat with Asam Ud Din, he discussed with him that he has contacted Abid through voice note. Accused Ibrar Alam further said to complainant Asam Ud Din not to inform Mr. Abid (witness of complainant Asam Ud Din) about the matter. Moreover, in a tiktok video both Abid and Ibrar Alam can be seen in a happy mood. Therefore, it is concluded that the accused warder Ibrar Alam and the witness Mr. Abid knew each other well before and that the accused warder Ibrar Alam gave misstatement to the undersigned.
5. While examining the witnesses and exchanged voice notes, it is proved that the complainant Assam Uddin came from Swat to pick Ibrar Alam in Talaash whereafter they proceeded to Islamabad to meet so called D.G (Director General).
6. While inquiring about the easypaisa number 0305-9000988, Warder Ibrar expressly told that I have no information about this number and neither I have done any transaction through this number. Warder Ibrar Alam expressed himself unaware about the transaction of amount Rupees Thirty Thousand (30,000).
7. On the contrary, upon further investigation, the easypaisa number 0305-9000988 was traced out by the undersigned and interestingly the number belonged to an employee of Prison Department presently posted at District Jail Timergara. His details are (Attached as annex-L).
8. That the undersigned deemed it necessary to include Warder Abdullah into the inquiry to reach the depth of the matter. The same was directed to appear before the office of undersigned on 27.12.2023 vide letter No. 15678 dated 26.12.2023.
9. Warder Abdullah appeared before the undersigned on 27.12.2023 at Central Prison Mardan. Warder Abdullah stated that he and Ibrar Alam are friends and reside in the same barrak at District Jail Timergara. Warder Abdullah expressly confessed that he received amount Rupees thirty thousand (30,000) through his personal easypaisa account and delivered the same amount in cash to Naseer Alam in presence of his brother Warder Ibrar Alam on 27.02.2023. Accused Warder Ibrar Alam extended thanks to complainant Assam Uddin after successful transaction in the whatsapp voice note.
10. In order to receive Rupees Thirty thousand (30,000) from Assam Uddin, Warder Ibrar Alam gave Abdullah's number to the sender. While examining the whatsapp voice notes between Assam Uddin and Ibrar Alam about the transaction of Rupees Thirty thousand (30,000), it solidifies the fact that the transaction has taken place between Ibrar Alam and Assam Uddin. The easypaisa receipt and exchanged voice notes between Ibrar Alam and Assam Uddin clearly depicts that Warder Ibrar Alam has received amount Rupees Thirty thousand (30,000) from Assam Uddin. Furthermore, Warder Abdullah has endorsed the transaction; as transaction took place through Warder Abdullah's Easypaisa account.
11. Upon examination of whatsapp voice notes, Mr. Ibrar Alam was reluctant to reply timely to Assam Uddin for his work. One day, Assam Uddin went to District Jail Timergara to

Attested

Deputy Superintendent
Central Prison Mardan
8/6

is observed that the relationship between complainant Assam Uddin and Warder Ibrar Alam got worsened.

FINDINGS/FACTS:

1. The examined voice notes conversed between accused Warder Ibrar Alam and complainant Assam Uddin apparently depicts that these notes belong to these two, yet for authentication these voice notes need a forensic.
2. Though the accused Warder Ibrar Alam didn't disclose his identity as Assistant Director (IB) in voice notes but he is persistently directing Assam Uddin to keep the matter as secret one and not reveal in public which shows his impersonation. The above used words (**given in record**) prima facie leads to accused Ibrar Alam's impersonation as if he is working for some intelligence agency. Also he is persistently saying in voice notes that I am busy in official meetings.
3. Mr. Abid, the previous eye-witness of Rupees Four Lacs (400,000) examined by inquiry officer Naveed Iqbal Assistant Superintendent Sub Jail Dir Upper, has departed for KSA. Remaining two witnesses (Javed and Sadiq) for Rupees Four Lacs (400,000) were cross examined and they stuck to their statements recorded in previous inquiry. Javed told that I withdrew amount Rupees Four Lacs (400,000) for Assam Uddin and handed over to Sadiq so that Assam Uddin may receive it at Talaash. Till now it shows that this amount was meant to be delivered to the accused Warder Ibrar Alam. As in the exchanged voice notes between Assam Uddin and Ibrar Alam, Assam Uddin assures Ibrar Alam before departure to Islamabad that his "Amanat" (Money) is with him.
4. Accused Warder Ibrar Alam is expressly showing unfamiliarity with the witness Abid in his statement produced before the undersigned. But in his voice chat with Asam Ud Din, he discussed with him that he has contacted Abid through voice note. Accused Ibrar Alam further said to complainant Asam Ud Din not to inform Mr. Abid (witness of complainant Asam Ud Din) about the matter. Moreover, in a tiktok video both Abid and Ibrar Alam can be seen in a happy mood. Therefore, it is concluded that the accused warder Ibrar Alam and the witness Mr. Abid knew each other well before and that the accused warder Ibrar Alam gave misstatement to the undersigned.
5. While examining the witnesses and exchanged voice notes, it is proved that the complainant Assam Uddin came from Swat to pick Ibrar Alam in Talaash whereafter they proceeded to Islamabad to meet so called D.G (Director General).
6. While inquiring about the easypaisa number 0305-9000988, Warder Ibrar expressly told that I have no information about this number and neither I have done any transaction through this number. Warder Ibrar Alam expressed himself unaware about the transaction of amount Rupees Thirty Thousand (30,000).
7. On the contrary, upon further investigation, the easypaisa number 0305-9000988 was traced out by the undersigned and interestingly the number belonged to an employee of Prison Department presently posted at District Jail Timergara. His details are (**Attached as annex-L**).
8. That the undersigned deemed it necessary to include Warder Abdullah into the inquiry to reach the depth of the matter. The same was directed to appear before the office of undersigned on 27.12.2023 vide letter No. 15678 dated 26.12.2023.
9. Warder Abdullah appeared before the undersigned on 27.12.2023 at Central Prison Mardan. Warder Abdullah stated that he and Ibrar Alam are friends and reside in the same barrak at District Jail Timergara. Warder Abdullah expressly confessed that he received amount Rupees thirty thousand (30, 000) through his personal easypaisa account and delivered the same amount in cash to Naseer Alam in presence of his brother Warder Ibrar Alam on 27.02.2023. Accused Warder Ibrar Alam extended thanks to complainant Assam Uddin after successful transaction in the whatsapp voice note.
10. In order to receive Rupees Thirty thousand (30,000) from Assam Uddin, Warder Ibrar Alam gave Abdullah's number to the sender. While examining the whatsapp voice notes between Assam Uddin and Ibrar Alam about the transaction of Rupees Thirty thousand (30,000), it solidifies the fact that the transaction has taken place between Ibrar Alam and Assam Uddin. The easypaisa receipt and exchanged voice notes between Ibrar Alam and Assam Uddin clearly depicts that Warder Ibrar Alam has received amount Rupees Thirty thousand (30,000) from Assam Uddin. Furthermore, Warder Abdullah has

meet Ibrar Alam whereby Ibrar Alam pushed him back to leave at once; he was scared that other fellows will be informed about his fraud. Accused Warder Ibrar Alam too confirmed that incident and accused Assam Uddin tried to kidnap him from jail premises. The personal relationship between Assam Uddin and Warder Ibrar Alam disturbed the peaceful environment of Jail.

12. Ibrar Alam is denying his relationship with Assam Uddin but they can be seen together in a Tik Tok video in pleasant mode.

CONCLUSION:

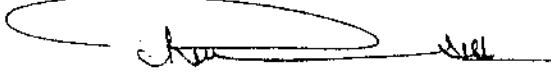
1. The examined voice notes conversed between accused Warder Ibrar Alam and complainant Assam Uddin apparently depicts that these notes belong to these two, yet for authentication these WhatsApp voice notes need a forensic.
2. It is hereby concluded that a secret deal for consideration of money has been proved between complainant Assam Uddin and Warder Ibrar Alam regarding resolution of Assam Uddin family issue by Ibrar Alam, yet for authentication these WhatsApp voice notes need a forensic.
3. The WhatsApp voice chats shows prima facie leads to accused Ibrar Alam's impersonation as if he is working for some intelligence agency.
4. As for now, amount Rupees thirty thousand (30, 000) is **fully proved** against Warder Ibrar Alam.
5. While the amount Rupees four lacs (400,000) is **partially proved** as the complainant Assam Uddin has only produced marginal witnesses and there is no documentary proof.
6. That for the remaining amount Rupees three lacs and twenty thousand (3, 20,000) claimed by complainant Assam Uddin, he couldn't produce any witness or document, hence **not proved**.
7. Moreover, Warder Ibrar Alam couldn't produce any witness or document for any kind of transaction amount Rs. 10,00,000 (Ten lacs) between his brother Naseer Alam and complainant Assam Uddin.

RECOMMENDATIONS:

After conducting a thorough inquiry into the allegations levelled against the accused official namely Warder Ibrar Alam S/O Alamzeb, it is concluded that the allegation levelled against the accused official by the Superintendent Headquarter Prisons Mardan, the competent authority, on the report of Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar Under Section 3 of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011, were **PARTIALLY PROVED**.

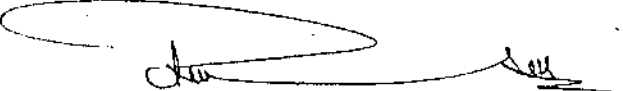
It is therefore recommended that the accused official is liable to be proceeded under the relevant rule *ibid*.

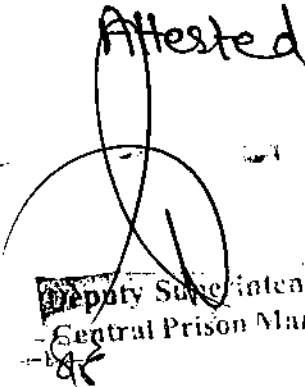
Submitted for further disposal in accordance with the rules, please.


RIAZ AHMAD (INQUIRY OFFICER)
DEPUTY SUPERINTENDENT
CENTRAL PRISON MARDAN

CERTIFICATE

It is certified that the report regarding the accused Warder Ibrar Alam (BPS-07) attached to District Jail Timergara are consisting of Five (05) number of pages duly corrected and signed by me.


RIAZ AHMAD (INQUIRY OFFICER)
DEPUTY SUPERINTENDENT
CENTRAL PRISON MARDAN

Attested

Deputy Superintendent
Central Prison Mardan

Better copy

endorsed the transaction; as transaction took place through Warder Abdullah's Easypaisa account.

11. Upon examination of WhatsApp voice notes, Mr. Ibrar Alam was reluctant to reply timely to Assam Uddin for his work. One day, Assam Uddin went to District Jail Timergara to meet Ibrar Alam whereby Ibrar Alam pushed him back to leave at once; he was scared that other fellows will be informed about his fraud. Accused Warder Ibrar Alam too confirmed that incident and accused Assam Uddin tried to kidnap him from jail premises. The personal relationship between Assam Uddin and Warder Ibrar Alam disturbed the peaceful environment of Jail.
12. Ibrar Alam is denying his relationship with Assam Uddin but they can be seen together in a Tik Tok video in pleasant mode.

CONCLUSION:

1. The examined voice notes conversed between accused Warder Ibrar Alam and complainant Assam Uddin apparently depicts that these notes belong to these two, yet for authentication these WhatsApp voice notes need a forensic.
2. It is hereby concluded that a secret deal for consideration of money has been proved between complainant Assam Uddin and Warder Ibrar Alam regarding resolution of Assam Uddin family issue by Ibrar Alam, yet for authentication these WhatsApp voice notes need a forensic.
3. The WhatsApp voice chats shows prima facie leads to accused Ibrar Alam's impersonation as if he is working for some intelligence agency.
4. As for now, amount Rupees thirty thousand (30, 000) is **fully proved** against Warder Ibrar Alam.
5. While the amount Rupees four lacs (400,000) is **partially proved** as the complainant Assam Uddin has only produced marginal witnesses and there is no documentary proof.
6. That for the remaining amount Rupees three lacs and twenty thousand (3, 20,000) claimed by complainant Assam Uddin, he couldn't produce any witness or document, hence **not proved**.
7. Moreover, Warder Ibrar Alam couldn't produce any witness or document for any kind of transaction amount Rs. 10,00,000 (Ten lacs) between his brother Naseer Alam and complainant Assam Uddin.

RECOMMENDATIONS:

After conducting a thorough inquiry into the allegations levelled against the accused official namely Warder Ibrar Alam S/O Alamzeb, it is concluded that the allegation levelled against the accused official by the Superintendent Headquarter Prisons Mardan, the competent authority, on the report of Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar Under Section 3 of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011, were **PARTIALLY PROVED**.

It is therefore recommended that the accused official is liable to be proceeded under the relevant rule *ibid*.

Submitted for further disposal in accordance with the rules, please.

**RIAZ AHMAD (INQUIRY OFFICER)
DEPUTY SUPERINTENDENT
CENTRAL PRISON MARDAN**

CERTIFICATE

It is certified that the report regarding the accused Warder Ibrar Alam (BPS-07) attached to District Jail Timergara are consisting of Five (05) number of pages duly corrected and signed by me.

**RIAZ AHMAD (INQUIRY OFFICER)
DEPUTY SUPERINTENDENT
CENTRAL PRISON MARDAN**

Deputy Superintendent
Central Prison Mardan

Deputy Superintendent
Central Prison Mardan
Scanned with CamScanner

CamScanner

Handwritten signature and circular stamp

Mashed

Attached

Handwritten text in Urdu script, likely a letter or report.

Handwritten text in Urdu script, possibly a signature or name.

Handwritten text in Urdu script.

Handwritten text in Urdu script, possibly a list or detailed notes.

Handwritten text in Urdu script.

Handwritten text in Urdu script, possibly a signature or name.

Deputy Superintendent
Central Prison Mardan

Attached

عاویز ولد رازی گل سنگ امانتہ قسطن
 27 اپریل 2023 کو جو جمعہ مقام
 نے فون کیا کہ اپنے اکاؤنٹ سے 400000 روپے
 نکال کر محمد صہادتی ولد محمد امین سنگ تالاش
 کو دین دے۔ چونکہ میں سوات میں ہوں اور
 سوات سے آ رہا ہوں۔ یہ تالاش میں محمد صہادتی
 نے عفا کو پیسے دیے۔ اس دوران خالد خان
 ولد وزیر سنگ پشاور بھی عفا کے ساتھ
 موجود تھا۔

Attested
 Deputy Superintendent
 Central Prison, Mardan.

خالد خان ولد وزیر سنگ پشاور

میں خالد خان اسو بابت گواہ ہوں کہ عفا
 نے میرے سامنے ڈیوارڈر اہرار کو 400000 روپے
 عوا لایا۔ یہ پیسے ہم نے تالاش میں اہرار کو دیے۔
 ادھر میں نے سٹارٹنگ ٹکر ان کے ساتھ سفر کیا اور
 سٹارٹنگ میں اتر گیا۔

Attested
 Deputy Superintendent
 Central Prison, Mardan.

Deputy Superintendent
Central Prison, Madras

Attached

Deputy Superintendent
Central Prison, Madras

Attached

20/12/53

Handwritten text in Tamil script, likely a letter or report, starting with "அன்புள்ள..." (Dear...)

Handwritten text in Tamil script, continuing the letter or report.

Handwritten text in Tamil script, continuing the letter or report.

Handwritten text in Tamil script, continuing the letter or report.

Handwritten text in Tamil script, including contact information: "தலைவர் அலுவலகம், மதுரை, தொலைபேசி: 0345-6102696"

Handwritten text in Tamil script, possibly a signature or name.

(۱۱)

سوال نمبر ۱

حاجہ روناہ اور بی بی گل سزائے موت کی اپنی سزا کو چھوڑنے کے لیے عدالت سے درخواست کر رہی ہیں۔
No. 0345-6102696
CNIC 15402-8675877-9

سوال نمبر ۲
بینک Statement ہے

جواب نمبر ۱
بینک Statement میں لکھا ہے کہ حاجہ روناہ اور بی بی گل سزائے موت کی اپنی سزا کو چھوڑنے کے لیے عدالت سے درخواست کر رہی ہیں۔

سوال نمبر ۳
جواب نمبر ۲
بینک Statement میں لکھا ہے کہ حاجہ روناہ اور بی بی گل سزائے موت کی اپنی سزا کو چھوڑنے کے لیے عدالت سے درخواست کر رہی ہیں۔

جواب نمبر ۳
بینک Statement میں لکھا ہے کہ حاجہ روناہ اور بی بی گل سزائے موت کی اپنی سزا کو چھوڑنے کے لیے عدالت سے درخواست کر رہی ہیں۔

20/12/2023

Attested

Deputy Superintendent
Central Prison, Mardan

محمد طارق ولد محمد آصف سنگ قاضی آباد تارک
مردان

جب عفا کے جاریہ سے یہاں کے اپنے اگاہوں
سے سب سے کہا کہ جمعہ دن دن تو جاریہ نے

جمعہ 40000 روپے دیں اور میں نے 40000 روپے
عفا کو دیں۔ اور ہم نے عفا کے
یہاں کے تمام آباد جاریہ کے۔


Attested
Deputy Superintendent
Central Prison Mardan
8/8

Attested
Deputy Superintendent
Central Prison Mardan

محمد طارق ولد محمد آسن سنگ قاضی آباد تارا
مذہب

جلا جب عقائد جاوید سے کیا کہ اپنے اقاویں
سے سب سے تعالٰیٰ تم جمع دیں رہا تو جاوید نے
جمع ۵۵۵۵۵۵ روپے دیں اور میں نے ۵۵۵۵۵۵
روپے عقائد کو دیں درجہ اور پھر جمع عقائد نے
کیا کہ ہم اسکا آباد جا رہے ہیں۔

Attached


Deputy Superintendent
Central Prison, Mardan

سوال نامہ عدو جوابات

محمد صادق ولد محمد امین سکند قاضی آباد ڈاکٹھانہ زیارت ٹالاشن زیارت

فصل نمبر ۱۰۰۰۰۰۰۰۰۰۰۰۰۰

CNC : 15302-9735740-3

Mob: 03439781875

سوال نمبر ۱: عہام نے آپ کو کب اور کہاں سے کال کیا کہ جاوید سے پیسے لے لے
جواب : عدو تادیخ اور وقت کا بے پتہ نہیں لیکن عہام نے مجھے کال کیا
کہ میں سوان سے ٹالاشن آ رہا ہوں اور آپ جاوید سے نمبر گروہ
میں چار لاکھ روپے وصول کر لیں

سوال نمبر 2: کب اور کہاں پر آپ نے جاوید سے پیسے لے لے ؟
جواب : نمبر گروہ میں میں نے بندہ سے جاوید سے 40000 روپے
محمد صادق وصول کر لے

سوال نمبر 3: عہام کس گاڑی میں سوان سے آئے جب آپ
ٹالاشن میں ان کا انتظار کر رہے تھے ؟

جواب : عہام بلیک کمر گاڑی میں آئے تھے
محمد صادق

سوال نمبر 4: آپ نے جاوید کو کتنے پیسے دیے ؟

جواب : میں نے عہام کو چار لاکھ روپے دیے۔ اس نے مزید
کہا کہ میرا کرفٹ ذاقا ملے۔ میں اس رقم آباد پارٹی میں

سوال نمبر 5: آپ کیا کام کرتے ہیں ؟

جواب : میں عہام کے دوکان میں salesman ہوں

Attested

Attested

Deputy Superintendent
Central Prison Mardan

۹۲

Deputy Superintendent
Central Prison Mardan

سوال نمبر 1

محمد صادق ولد محمد امین سکند قاضی آباد ڈاکٹریٹ زبیرت تلاش زبیرت
تحصلہ بیسگرہ مبلغ نو روپے

CNC : 15302-9735740-3

Mob: 03439781875

سوال نمبر 1: عمام نے آپ کو کب اور کہاں سے کال کیا کہ جاوید سے پیسے لے لے
جواب: عمام نے تاریخ اور وقت کا بھلا پتہ نہیں لیکن عمام نے عمارت کال کیا
کہ میں سوان سے تلاش آ رہا ہوں اور آپ جاوید سے بیسگرہ
میں چار لاکھ روپے وصول کر

سوال نمبر 2: کب اور کہاں آپ نے جاوید سے پیسے لے لے ؟
جواب: بیسگرہ میں عمارت کے ساتھ جاوید سے 4000 روپے
محمد صادق وصول کیے

سوال نمبر 3: عمام کس گاڑی میں سوان سے آئے جب آپ
تلاش ہیں ان کا انتظار کر رہے تھے ؟

جواب: عمام بلیک color کراؤن گاڑی میں آئے تھے
محمد صادق

سوال نمبر 4: آپ نے جاوید کو کتنے پیسے دیے ؟

جواب: میں نے عمام کو چار لاکھ روپے دیے۔ اس نے مزید
کیا کہ میرا کوئی ذاتی مسئلہ ہے۔ میں اسٹیم آباد جا رہا ہوں

سوال نمبر 5: آپ کیا کام کاج کرتے ہیں ؟

جواب: میں عمام کے دوکان میں salesman ہوں

Attested

Deputy Superintendent
Central Jail Murdun

نمبر ۱۰۰

۱۰

سوال نمبر ۶: کیا آپ کو ابراہیم کو جاننے ہیں؟ کیا آپ کو پتہ ہے کہ
عصام نے ابراہیم کو چار لاکھ روپے دیے؟

جواب: نہیں، میں ابراہیم کو نہیں جانتا۔ مجھے پتہ ہی نہیں کہ
عصام نے پیسے کس کو دیے۔

Case: میں نے مندرجہ بالا سوالات کے جوابات اپنے پورسٹ اور حواس
میں دیے اور یہ کہ یہ جوابات سچ اور حقیقت پر مبنی ہیں۔

مگر صادق

20/12/2023

Attested
Deputy Superintendent
Central Prison Mardan,
82

Attested
Deputy Superintendent
Central Prison Mardan,

Deputy Superintendent
General Prison, Jhang

Attested

20/12/2023

مختصہ

جنرل پرنسپل اور ایجوکیشن آفیسر اور ایجوکیشن آفیسر
جنرل پرنسپل اور ایجوکیشن آفیسر اور ایجوکیشن آفیسر
جنرل پرنسپل اور ایجوکیشن آفیسر اور ایجوکیشن آفیسر

جنرل پرنسپل اور ایجوکیشن آفیسر اور ایجوکیشن آفیسر
جنرل پرنسپل اور ایجوکیشن آفیسر اور ایجوکیشن آفیسر
جنرل پرنسپل اور ایجوکیشن آفیسر اور ایجوکیشن آفیسر

Bottom copy

Arrestment of Warden Abdullah S/O Muhammad
Ali Jan R/O Munda, Khadi Khela, Tehsil
Samay Bagh, District Lower Dir.
CNIC: 15304-6869097-3 Mobile: 0305-9000988

میں 17 اگست 2022 کو قید حیل خانہ قات میں بطور وارڈر گرفتار ہوا۔

میں شہر گڑھ قید حیل میں ڈپٹی سراسر انجام دے رہا ہوں۔ میں وارڈر

ابراہیم کو 10 ماہ سے جانتا ہوں۔ میرا اہلیہ کا پتہ اکاؤنٹ ہے

جو تقریباً دو سال سے استعمال کرتا ہوں۔ ابراہیم اور زعیر

دونوں بھائیوں میں سے آج سے میرا زعیر (اہلیہ کا پتہ اکاؤنٹ)

کے اہلیہ کے متعلق کو دیکھو آپ کے اکاؤنٹ میں 30 ہزار

روپیہ آئے گا۔ 27 فروری 2023 کو میں نے اہلیہ

اکاؤنٹ میں 30 ہزار روپیہ وصول کیے۔ میں نے

اہلیہ کا پتہ اکاؤنٹ سے پیسے نکال کر ابراہیم عالم کی

موجودگی میں اس کے بھائی زعیر عالم کو دے دیے۔

اس کے علاوہ میں نے ابراہیم عالم کے ساتھ کوئی

اہلیہ کا پتہ ٹرانزیکشن نہیں کیا اور نہ اس کے بھائی (عبر عالم)

کے ساتھ کوئی ٹرانزیکشن کیا ہے۔

Oath: میں نے درج بالا بیان اپنے حوالہ سے دیا ہے۔

بیان بلا جبر واکراہ دیا ہے اور سچ و حقیقت رکھتی ہے

LTI
Attested



عبدالله وارڈر

27-12-2023

Attested


Attested

Deputy Superintendent
Central Prison Mardan

Attested

Deputy Superintendent
Central Prison Mardan

Statement of Wandaar Abdullah % Muhammad
Al. Jan R/o Munda, Khadi Khela, Tehsil
Somar Bagh, District Lower Dir.
CNIC: 15344-686997-3 Mobile: 0305-9000988

Deputy Superintendent
Control Room Mirpur


27-12-2023

عبداللہ خان




LTI
Mirpur


QAT: میں نے کئی بار پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔

- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔
- میں نے پاکستان اور افغانستان میں سفر کیا ہے اور وہاں کی صورتحال سے واقف ہوں۔

Better copy

(1)

سوال نمبر ۱: جواب دے

عبداللہ ولد محمد علی خان سکنہ خادی خیلہ منڈا، تحصیل گرباغ ضلع نور پور

CNIC: 15304-6869097-3

MOB: 0305-9000988

سوال نمبر 1: آپ وارڈر ابراہام کو کیسے جانتے ہیں؟

جواب: وارڈر ابراہام میرا ساتھی ہے اور ہم ڈسٹریکٹ جیل فیصل آباد میں ڈیوٹی سرانجام دے رہے ہیں۔ میں اُن کو دس ماہ سے جانتا ہوں۔

سوال نمبر 2: نصیر عالم کون ہے؟ اور آپ اُن کو کیسے جانتے ہیں؟

جواب: نصیر عالم وارڈر ابراہام کا بھائی ہے۔ میں اُن کو تقریباً 12 ماہ سے جانتا ہوں۔ میں نصیر عالم کو ابراہام کے واسطے سے جانتا ہوں۔

سوال نمبر 3: 27 فروری 2023 کو آپ کے ایڑی پیراگراف میں

30 ہزار روپے کی رقم تفریق ہوئی ہے۔

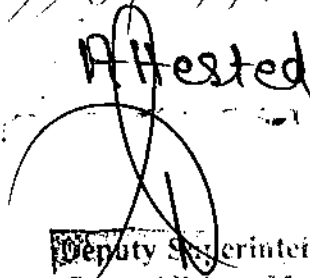
جواب: یہ رقم تفریق نہیں۔

سوال نمبر 4: آپ نے 30 ہزار روپے کی رقم خود کیا؟

جواب: ~~میں نے 30 ہزار روپے ایڑی پیراگراف میں (BOK) میں خود~~

~~تفریق کی ہے۔~~ میں نے ~~30 ہزار روپے~~ ابراہام عالم کو تفریق میں نصیر عالم

Attested



Deputy Superintendent
Central Prison Mardan

۹۶

Attested
Deputy Superintendent
Central Prison Mardan

①

سوال نمبر ۱ جواب

عبداللہ ولد محمد علی خان سکند خاں خیلہ منڈان تحصیل گنواغ ضلع گوجرانو

CNIC: 15304-6869097-3

Mob: 0305-9000980

سوال نمبر ۱: آپ وارڈر ابراہام کو کیسے جانتے ہیں؟

جواب: وارڈر ابراہام میرا ساتھی ہے اور ہم ڈسٹرکٹ جیل تقریباً ۱۰ سال پہلے سے جیل میں ڈیوٹی سرانجام دے رہے ہیں۔ میں ان کو دس ماہ سے جانتا ہوں۔

سوال نمبر ۲: نصیر عالم کونسا ہے؟ اور آپ ان کو کیسے جانتے ہیں؟

جواب: نصیر عالم وارڈر ابراہام کا بھائی ہے۔ میں ان کو تقریباً ۱۰ ماہ سے جانتا ہوں۔ میں نصیر عالم کو ابراہام عالم سے واسطے سے جانتا ہوں۔

سوال نمبر ۳: ۲۶ فروری ۲۰۲۳ کو آپ کے ایڑی سے اگرنٹ میں

۳۰ ہزار روپے کس نے ٹرانسفر کر دیا؟
جواب: مجھے پتہ نہیں۔

سوال نمبر ۴: آپ نے ۳۰ ہزار روپے کس کو دیا؟

جواب: ~~میں نے ۳۰ ہزار روپے ایڑی سے اپنے بھائی کو (BOK) دیا تھا۔~~

میں نے نصیر عالم کو ابراہام عالم کی موجودگی میں نصیر عالم کو دیا۔

Deputy Commissioner
Central Prison, Mardan

Prison Superintendent
Central Prison (Mardan)

38

Altogether

Prison Superintendent
Central Prison (Mardan)

Scanned with CamScanner

1. ...
 2. ...
 3. ...
 4. ...
 5. ...
 6. ...
 7. ...
 8. ...
 9. ...
 10. ...
 11. ...
 12. ...
 13. ...
 14. ...
 15. ...
 16. ...
 17. ...
 18. ...
 19. ...
 20. ...

2) وزارت عدالت

سوال نمبر 5: آپ کو ب سے پہلے کس Approach دیا کہ آپ کے ایگزیکٹو اکاؤنٹ میں 30 ہزار روپیہ آئے گا؟

جواب: میں اور ابراہیم کے باہر Park میں بیٹھے تھے۔ ابراہیم نے کہا کہ آپ کے EasyPak Account میں 30 ہزار روپیہ آئے گا۔

سوال نمبر 6: آپ کا EasyPak اکاؤنٹ نمبر کس نے پیسہ receive کرنے سے لے دیا؟

جواب: مجھے پتہ نہیں کہ ابراہیم عالم نے لبر دیا یا ذہیر عالم نے۔

سوال نمبر 7: آپ کا اور ذہیر عالم کا فون پرستی دندہ رابطہ ہوا؟

جواب: کبھی رابطہ نہیں ہوا۔

سوال نمبر 8: آپ کو اس ٹرانزیکشن میں اتنے پیسے ملے؟

جواب: مجھے کوئی فائدہ نہیں ملا۔ اتنا 17 روپے چارجز ڈکٹے۔

سوال نمبر 9: ذہیر عالم سے پیسے آپ کے اکاؤنٹ میں کیوں آئے؟

جواب: حالتہ ابراہیم عالم موجود تھا؟

ابراہیم عالم نے میرا اکاؤنٹ نمبر دیا تھا۔ یہ مجھے پتہ نہیں کہ میرا اکاؤنٹ نمبر اس نے کیوں دیا؟

جواب: Attached

Deputy Commissioner
Special Police Officer

Deputy Superintendent
Central Prison Mandana

[Handwritten signature]

Attested

27-12-2023



Deputy Superintendent
Central Prison Mandana

[Handwritten signature]

Attested

میں نے سب سے پہلے اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔
اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔

اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔
اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔

اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔
اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔

اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔
اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔

اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔
اس کے بارے میں جاننے کی کوشش کی ہے اور اس کے بارے میں کوئی شکوکہ نہیں ہے۔

③ داروز عبد اللہ

سوال نمبر 10: کیا آپ Easy Paisa account بطور بزنس استعمال کرتے ہیں؟


جواب: ~~نہیں~~، میں اپنے ذاتی کاموں کے لئے ایسے سے اکاؤنٹ استعمال کرتا ہوں۔


سوال نمبر 11: کیا آپ گواہی دینا پسند کریں گے کہ 30 لاکھ روپیہ آپ نے ابراہار عالم اور زفر عالم کو Cash ہے؟

جواب: ~~ہاں~~، میں نے 30 لاکھ روپیہ وارڈر ابراہار عالم اور زفر عالم کو کیس حوالہ دے دیے۔

سرٹیفکیٹ: میں نے مندرجہ بالا سوالات (1 سے 11) تک کے جوابات اپنے پریشور اور حواس میں دیے اور یہ کچھ درجہ بالا جوابات صحیح و حقیقت پر مبنی ہیں۔

Attached


27-12-2023


Deputy Superintendent
Central Prison, Mardan

SHOW CAUSE NOTICE

68 Dated: 08/01/2024.

I, Muhammad Arif Khan (BPS-18), Superintendent Headquarter Prison Mardan, as competent authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve you, Warder (BPS-07) Ibrar Alam S/O Alamzeb attached to District Jail Timergara as follows:-

1- (i) That consequent upon the completion of inquiry conducted against you by the Inquiry Officer for which you were given opportunity of hearing vide this office communication No. 3238-43 dated: 16-11-2023.

(ii) That on going through the findings and recommendations of the Inquiry Officer, the material on record and other connected papers including your defence before the said Inquiry Officer. I am satisfied that you have committed the following act/ omission specified in section 3 of the said rules.


a. Charges of misuse of official status/impersonation/fraud.

2- As a result thereof, I, as competent Authority have tentatively decided to impose upon you the Major Penalty of "**Removal from Service**" under section 4 of the said rules.

3- You are therefore required to show cause as to why the aforesaid penalty should not be imposed upon you, also intimate whether you desire to be heard in person.

4- If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

5- A copy of the findings of the inquiry officer is enclosed.



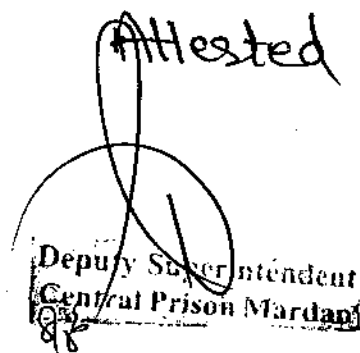
SUPERINTENDENT
CIRCLE HQS PRISON MARDAN

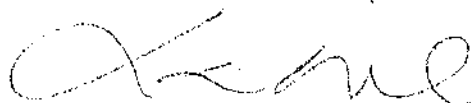
Endorsement No. 68-71 / Dated. 08/01/2024.

Copy of the above is forwarded to:-

1. The Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
2. The Superintendent District Jail Timergara for information and with the request that one copy of the Show Cause Notice duly signed and dated by the accused official as a token of its receipt may be returned to this office for record please.

Attest: Warder C/O Superintendent District Jail Timergara.

Attested

Deputy Superintendent
Central Prison Mardan



SUPERINTENDENT
CIRCLE HQS PRISON MARDAN



OFFICE OF THE SUPERINTENDENT CIRCLE HQS. PRISON MARDAN

No. 362/PB Dated: 01/02/2024, E-Mail: mardanjail@gmail.com, 0937-843114

OFFICE ORDER.

WHEREAS, accused official/Warder **Ibrar Alam S/O Alamzeb** attached to District Jail Timergara was charged within the meaning of Rule-3 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of his misconduct contained in statement of Allegations/ Disciplinary Action served upon him vide this Headquarter endorsement No. 3238-43 dated. 16-11-2023 wherein Mr. Riaz Ahmad, Deputy Superintendent Central Prison Mardan is appointed as Inquiry officer.

AND WHEREAS, he furnished his written reply/defence to the Inquiry officer without any documentary proof/evidence and the allegations/charges against him were **Partially Proved**.

AND WHEREAS, the accused official was proceeded against under Rule-14(4) for the charges of his misconduct/negligence in the performance of duty, as mentioned in the Show Cause Notice No. 69-71 dated. 08-01-2024.

AND WHEREAS, he furnished his written reply/defence without any documentary proof/evidence which was found un-satisfactory.


AND WHEREAS, the undersigned being competent authority granted him the opportunity of personal hearing on 01-02-2024 as provided for under rules ibid. The accused official completely failed to defend his case with documentary proof/evidence.

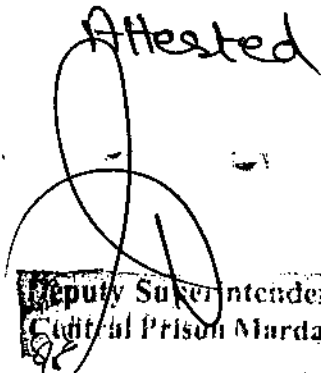
NOW THEREFORE, in exercise of powers conferred under Rule-14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, having considered the Inquiry report, charges levelled against him and evidence on record, the undersigned being Competent Authority, after observing all legal procedural formalities, hereby awarded the Major Penalty of "**Removal from Services**" with immediate effect to accused official/Warder Ibrar Alam S/O Alamzeb attached to District Jail Timergara for his misconduct/misuse of official status/impersonation/fraud.

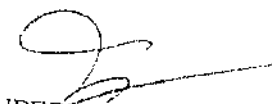
Endst: No. 363-67 /PB Dated: 01/02/2024.

Copy of the above is forwarded to:-

- 1- The Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar for information with reference to his order, upon application/complaint through WhatsApp on 25-09-2023, please.
- 2- The Superintendent District Jail Timergara for information and necessary action, please.
- 3- Mr. Riaz Ahmad (Inquiry Officer), Deputy Superintendent Central Prison Mardan for information with reference to his inquiry/ letter No.212-WE dated, 06-01-2024, please.
- 4- The District Accounts Officer Timergara Dir (Lower) for information and necessary action, please.
- 5- The above named Warder C/O Superintendent District Jail Timergara.


SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN

Attested

Deputy Superintendent
Central Prison Mardan


SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN

بکھور جناب اسپیکٹر جنرل جیل خانہ جات صوبہ خیبر پختونخواہ بمقام پشاور

درخواست/حکمانہ اپیل بر خلاف افس ارڈر نمبر 363-67/PB مورخہ 01-02-2024

جناب عالی! سب ذیل عرض ہے۔

1- یہ کہ من سائیل کی تقرری نسٹیت وارڈر (BPS-07) سال 2019 میں ہوئی تھی جبکہ ابتدائی تقرری بمقام سنٹرل جیل ضلع مردان بمقام مردان ہو کر جہاں پر من سائیل نے عرصہ تقریباً 10 ماہ اپنی فراہمی منجھی سرانجام دئے تھے۔ عرصہ دس ماہ ڈیوٹی سرانجام دینے کے بعد من سائیل کا تبادلہ ڈسٹرکٹ جیل چترال اور بعدہ سب جیل اپرڈریز بالاخر ڈسٹرکٹ جیل تیمرگرہ تبادلہ ہوا۔ واضح ہو کہ مذکورہ مقامات ڈیوٹی پر من سائیل کے خلاف کسی قسم کی شکایت یا انفران بالا کو کسی قسم کا شکایت کا موقع فراہم نہیں کیا گیا ہے اور اپنے فراہمی منجھی احسن طریقے سے سرانجام دی ہے۔

2- یہ کہ برادر ام کا علاقہ ہڈا میں بہتر شہرت ہو کر کافی لوگوں سے شناسائی ہے اسی طرح علاقہ/دیہہ خود میں اعصام الدین نامی شخص کا برادر ام سے شناخت پیدا ہو کر اپس میں گہری دوستی میں تبدیل ہو کر یوں ایک دوسرے کے ساتھ اعتماد کا رشتہ قائم ہوا تو موصوف نے برادر ام سے مبلغ 10 لاکھ روپیہ بطور قرض حسنہ مقررہ میعاد میں ادا کرنے کے لئے اخذ کئے۔ مقررہ میعاد گزرنے کے بعد موصوف لیٹ لعل سے کام لیتا رہا حتی طور پر مذکورہ رقم واجب الادا کی ادائیگی کے سلسلے میں ناکام ہو کر اعصام الدین اوچھے ہتھکھڑوں کے ذریعے نہ صرف رقم مذکورہ کی ادائیگی سے انکاری رہا بلکہ میرے بھائی اور من سائیل کے خلاف مختلف قانونی اور مقامی جرگوں کے ذریعے بلیک میل کرنے کی کوشش کرتا رہا۔ ہر فورم پر اپنی ناکامی دیکھ کر مذکور نے من سائیل کے خلاف ایک منگھرت کہانی جھاڑ کر انفران بالا کو خلاف حقائق اور اپنی پر جھوٹ شکایت دائیر کی جس پر انکو ایمری مقرر کی جا کر حتمی طور پر مورخہ 15-09-2023 کو بحوالہ افس ارڈر نمبر 1162-W/E اپنی قرارداد پیش کی۔ تاہم مذکورہ افس ارڈر کے باوجود من سائیل کو محض

سیاسی اثر رسوخ کے بناء مورخہ 08-01-2024 کو شوکاز نوٹس جاری ہو کر بالاخر بذریعہ افس ارڈر نمبر 363-67/PB

مورخہ 01-02-2024 کو اپنے عہدہ سے برخاست کرنے کی خلاف حقائق، خلاف قانون، خلاف ضابطہ نیز

خلاف فطری انصاف حکم جاری ہو کر افس سے ناراض ہو کر بوجوہات ذیل اپیل ہذا دائیر کیا جاتا ہے۔ واضح ہو کہ اپیل

ہذا سے قبل من سائیل نے ذاتی طور پر درخواست بمورخہ 28-02-2024 جبکہ دوسرا درخواست بمورخہ

21-03-2024 مجاز فورم پر داخل کیا ہے۔ تاہم کوئی مثبت جواب یا شنوائی حاصل نہ ہو کر یوں درخواست/

حکمانہ اپیل ہذا دائیر کیا جاتا ہے۔ (نقولاً افس ارڈر زمتذکرہ بالا دقولات درخواست ہائے لف ہیں)۔

۱- ...
 ۲- ...
 ۳- ...
 ۴- ...
 ۵- ...
 ۶- ...
 ۷- ...
 ۸- ...
 ۹- ...
 ۱۰- ...
 ۱۱- ...
 ۱۲- ...
 ۱۳- ...
 ۱۴- ...
 ۱۵- ...
 ۱۶- ...
 ۱۷- ...
 ۱۸- ...
 ۱۹- ...
 ۲۰- ...

30

- viii - اگر دورے اور سفر پر جانے والے طلبہ کو ایف ڈی ایس کے لیے درخواستیں دینے سے روکا جائے گا۔
- vii - اگر ایف ڈی ایس کے لیے درخواستیں دینے والے طلبہ کو ایف ڈی ایس کے لیے درخواستیں دینے سے روکا جائے گا۔
- vi - اگر ایف ڈی ایس کے لیے درخواستیں دینے والے طلبہ کو ایف ڈی ایس کے لیے درخواستیں دینے سے روکا جائے گا۔
- v - اگر ایف ڈی ایس کے لیے درخواستیں دینے والے طلبہ کو ایف ڈی ایس کے لیے درخواستیں دینے سے روکا جائے گا۔
- iv - اگر ایف ڈی ایس کے لیے درخواستیں دینے والے طلبہ کو ایف ڈی ایس کے لیے درخواستیں دینے سے روکا جائے گا۔
- iii - اگر ایف ڈی ایس کے لیے درخواستیں دینے والے طلبہ کو ایف ڈی ایس کے لیے درخواستیں دینے سے روکا جائے گا۔
- ii - اگر ایف ڈی ایس کے لیے درخواستیں دینے والے طلبہ کو ایف ڈی ایس کے لیے درخواستیں دینے سے روکا جائے گا۔
- i - اگر ایف ڈی ایس کے لیے درخواستیں دینے والے طلبہ کو ایف ڈی ایس کے لیے درخواستیں دینے سے روکا جائے گا۔

نوٹ: درخواستیں

Best copy

Handwritten text at the top of the page, possibly a header or title.

Handwritten text in the middle section of the page.

Handwritten text on the left side of the page.

Handwritten signature or name in the middle-right section.

Handwritten text spanning across the middle-right section.

Handwritten signature or name below the dashed line.

17-04-024500

Handwritten text in the lower middle section, possibly a list or detailed notes.

Handwritten text at the bottom of the main content area.

(3)

3-11-2013

2-11-2013

1-11-2013

1-11-2013

0345-8818669

Handwritten signature

Handwritten text: ...

Handwritten signature

17-04-2024

Handwritten text: ...

Handwritten text: ...

Handwritten text: ...

Better copy

No. Enlb/Ward/Orders/ 20232 /-

Dated 24-05-2024 /-

ORDER:

WHEREAS, Ex-Warder Ibrar Alam S/o Alam Zeb while attached to District Jail Timergara was awarded the major penalty of "Removal from Service" by Superintendent Circle Headquarters Prison Mardan vide Order No. 362/PB dated 01-02-2024 due to his misconduct.

AND WHEREAS, the said Ex-Warder preferred his departmental appeal for setting aside the penalty awarded to him and also requested for reinstatement in service.

AND WHEREAS, his appeal was examined in light of the available record of the case and it was observed that the penalty was awarded to him by the competent authority due to his misconduct after observing all legal and codal formalities as required under Government Servants (Efficiency & Discipline) Rules, 2011. Moreover, the appeal was filed on 18-04-2024 and found time barred.

NOW THEREFORE, having considered the charges, evidences / facts on record, explanation of the accused official in his appeal, the provision of rules in vogue and in exercise of powers conferred under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 read with Rule-05 of Khyber Pakhtunkhwa Service Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being time barred and without any facts / merit.

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

ENDST; NO. 20239 - 42 /-

Copy of the above is forwarded to the:

1. Superintendent, Headquarters Prison Mardan for information and necessary action w/r to his order referred to above.
2. Superintendent, District Jail Timergara for information and necessary action with reference to the Superintendent HQs Prison Mardan order referred to above. He is directed to inform the appellant accordingly and also to make necessary entry in his Service Book under proper attestation.
3. The appellant C/o Superintendent District Jail Timergara for information.
4. PS to I.G, Prisons Khyber Pakhtunkhwa Peshawar.

DS/PB

SUPDT

30/05/24 ONo = 1375

ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR.

24/05/2024

Attested

Deputy Superintendent
Central Prison Mardan



OFFICE OF THE
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
☎091-9210334, 9210406 📠091-9213445

No. _____

Dated _____

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