

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

In Service Appeal No. 571/2022

Muhammad Zubair (Ex-Warder) attached to Central Prison Bannu.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Home Civil Secretariat Peshawar and others.....

INDEX

S.N.	Description of Documents	Annexures
01.	Affidavit	1
a	Office Order dated 04-12-2019	2
02.	Office Order dated 05-03-2020	3
03.	Office Order dated 25-06-2021	4
04.	Awarded punishments details vide Superintendent office letter No.3388 dated 02-08-2021.	5
04.	Authority letter	6
05.	Application	7


MUHAMMAD USMAN
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

In the matter of
Service Appeal No. 571/2022
Muhammad Zubair (Ex-Warder) Central Prison Bannu.

..... (Appellant)
VERSUS

Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar and
others.

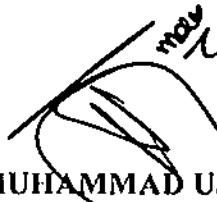
**Subject: APPLICATION/REQUEST FOR SUBMISSION OF
ADDITIONAL DOCUMENTS.**

.....
Dated 18.10.24

The Representative on behalf of official respondents submit are
as under:-

R/Sir,

1. That the captioned service appeal is pending before this Honorable service tribunal in which **29/10/2024** is fixed for hearing.
2. That in the subject case Respondent department have already been submitted their Joint Para-wise comments/reply.
3. That on 09-09-2024 the representative of this office appeared in behalf of the official respondents. During course of hearing the Honorable Service Tribunal directed the representative of respondents to produce to original/copies of the penalties imposed upon the appellant as mentioned in Paragraph-2 of the objection of the fact of joint Para-wise comments/reply submitted by concerned respondents and relisted for **29-10-2024**.
4. In compliance with the direction of the Khyber Pakhtunkhwa Service Tribunal the respondents may please be allowed through this instant application to submit the desired record before this Tribunal in order to decide the case merit.


**MUHAMMAD USMAN
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

In the matter of

Service appeal No. 571/2022

Muhammad Zubair, (Ex-Warder) attached to Central Prison Bannu

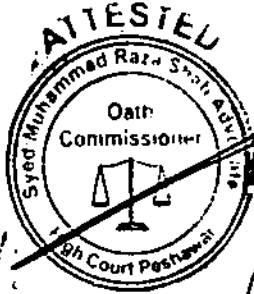
.....(Appellant)

VERSUS

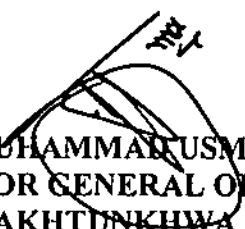
1. Government of Khyber Pakhtunkhwa through Secretary Home Civil Secretariat Peshawar and others.

AFFIDAVIT

I, Mr, Muhammad Usman do hereby solemnly affirm and declare that the accompanied documents in the instant Service Appeal are correct and true to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal. It is further stated on oath that in this appeal, the respondents have neither been placed ex-parte nor their defense has been struck off.



11 8 OCT 2024


MUHAMMAD USMAN
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



OFFICE OF THE SUPERINENDENT
PRISONS CIRCLE HEAD QUARTER D.I.KHAN
No. 621 / PB Date 04-12-19
PH&FAX \No. 0966-9280299
cpdikhan1@gmail.com

OFFICE ORDER

WHEREAS, the accused warders Mr. Zulfiqar Ahmed, Asmat Ullah and Muhammad Zubair attached to Central Prison Bannu were proceeded against under Rule-3 of Khyber Pakhtunkhwa Government Servants(Efficiency & Discipline) Rules, 2011 for the charges of their misconduct as mentioned in the charge sheet/Show Cause Notice Served upon them.

AND WHEEAS, they furnished reply but the same was found unsatisfactory.

AND WHEEAS, the accused officials completely failed to defend their case with documentary proof/evidence.

NOW therefore, in exercise of powers conferred under Rule-145(5) of Khyber Pakhtunkhwa Government Servants(Efficiency & Discipline) Rules 2011, having considered the charges, evidence on record, the explanation of the accused officials and, the undersigned being competent authority, hereby award minor penalty of "**CENSURE AND STRICTLY WARNED TO BE CAREFUL IN FUTURE**" to Zulfiqar Ahmed, Asmat Ullah and Muhammad Zubair attached to Central Prison Bannu for their misconduct.

Endorsement No. 622-25

SUPERINTENDENT
CIRCLE H/QS PRISON DIKHAN

9/2
04/12/19

Copy of the above is forwarded to :-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information.
2. The Superintendent Central Prison Bannu. Necessary entry may please be made in the Service Book of official concerned under proper attestation.
3. DAO Bannu.
4. Mr. Zulfiqar Ahmed, Asmat Ullah and Muhammad Zubair attached to Central Prison Bannu.

SUPERINTENDENT
CIRCLE H/QS PRISON DIKHAN

0/2

0/1



OFFICE OF THE SUPERINENDENT
PRISONS CIRCLE HEAD QUARTER D.I.KHAN
No. 698 / PB Date _____
PH&FAX \No. 0966-9280299
cpdikhan1@gmail.com

WHEREAS, the accused warders Mr. Kmaran Umer, Arif Ullah, Shafqat Ali, Irfan Ullah, Sami Ullah Khattak, Zubair Khan, Abdul Nawaz and Saeed Khan attached to Central Prison Bannu were proceeded against under Rule-3 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of their misconduct as mentioned in the charge sheet/Show Cause Notice Served upon them.

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

AND WHEREAS, the accused officials completely failed to defend their case with documentary proof/evidence.

NOW therefore, in exercise of powers conferred under Rule-145(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, having considered the charges, evidence on record, the explanation of the accused officials and, the undersigned being competent authority, hereby award minor penalty of "**CENSURE**" to warders Mr. Arif Ullah, Irfan Ullah, Sami Ullah Khattak and Saeed Khan attached to Central Prison Bannu for their willful absence and minor penalty of "**STOPPAGE OF ONE INCREMENT FOR ONE YEAR**" to Warder Shafqat Ali, Zubair Khan and Abdul Nawaz attached to Central Prison Bannu for their willful absence and minor penalty of "**STOPPAGE OF TWO INCREMENTS FOR TWO YEARS**" to Warder Kamran Umer attached to Central Prison Bannu for his willful absence. The period of absence of warder Kmaran Umer w.e.f 04.11.2019 to 20.12.2019 & w.e.f 22.12.2019 to 16.01.2020, period of absence of warder Arif Ullah w.e.f 20.09.2019 to 03.10.2019, period of absence of warder Shafqat Ali w.e.f 04.09.2019 to 29.10.2019, period of absence of warder Irfan Ullah w.e.f 12.11.2019 to 19.11.2019, period of absence of warder Sami Ullah Khattak w.e.f 17.10.2019 to 18.11.2019, period of absence of warder Zubair Khan w.e.f 26.11.2019 to 04.12.2019, period of absence of warder Abdul Nawaz w.e.f 23.11.2019 to 05.12.2019 and period of absence of warder Saeed Khan w.e.f 17.12.2019 to 24.12.2019 is hereby "**Treated As Leave Without Pay**"

SUPERINTENDENT
CIRCLE H/QS PRISON DIKHAN

Endorsement No. 699-202 ^{2w} 05-03-2020 @

Copy of the above is forwarded to :-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information.
2. The Superintendent Central Prison Bannu. Necessary entry may please be made in the Service Book of official concerned under proper attestation.
3. DAO Bannu.
4. Mr. Kmaran Umer, Arif Ullah, Shafqat Ali, Irfan Ullah, Sami Ullah Khattak, Zubair Khan, Abdul Nawaz and Saeed Khan attached to Central Prison Bannu.

SUPERINTENDENT
CIRCLE H/QS PRISON DIKHAN



OFFICE OF THE SUPERINENDENT
PRISONS CIRCLE HEAD QUARTER D.I.KHAN
No. 2508 / PB Date 25-06-2021
PH&FAX \No. 0966-9280299
cpdikhan1@gmail.com

OFFICE ORDER

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

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

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

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

Endorsement No. 2509-12

SUPERINTENDENT
CIRCLE H/OS PRISON DIKHAN

Copy of the above is forwarded to :-

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

SUPERINTENDENT
CIRCLE H/OS PRISON DIKHAN



OFFICE OF THE SUPERINENDENT
PRISONS CIRCLE HEAD QUARTER D.I.KHAN
No. _____ / HQ Date _____
PH&FAX \No. 0966-9280299
cpdikhan1@gmail.com

Table-B

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

u
SUPERINENDENT
CIRCLE H/QS PRISON DIKHAN

AUTHORITY LETTER

Mr. Ghulam Mustafa 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**