

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

In the matter of  
Service Appeal No.1677/2024  
Islam-Ud-Din (Ex-Warder) attached at District Jail Timergara.

.....Appellant.

**VERSUS**

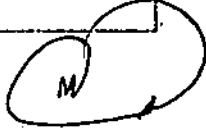
1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
2. The Superintendent Circle Headquarter Prison Mardan.
3. Additional Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.

.....Respondents.

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Received reply on verbal direction of Registrar.  
Kpst.

  
Deponent

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

In the matter of Service Appeal No: 1677/2024

Filed by Islam-Ud-Din S/O Faqir Khan (Ex-Warder) attached at District Jail Timergara  
..... (APPELLANT)

**VERSUS**

1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar
2. The Superintendent Circle Headquarter Prison Mardan
3. Additional Inspector General of Prisons Khyber Pakhtunkhwa Peshawar

.....(RESPONDENTS)

Khyber Pakhtunkhwa  
Service Tribunal  
18149  
Diary No. 20/11/24

**SUBJECT: JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.1,2 & 3**

**Respectfully Sheweth**

**Preliminary Objections:**

1. That the appellant has got no cause of action/locus standi.
2. That the instant appeal is badly time barred.
3. That the appellant has concealed the material facts from this honorable tribunal, hence liable to be dismissed.
4. That the appellant has not come to this honorable court with clean hands.
5. That the appellant has filed the instant appeal just to pressurize the respondents.
6. That the instant appeal is against the prevailing law and rules.
7. That the appellant is estopped by his own conduct to file this instant appeal.
8. That the present appeal is not maintainable in the present form and also in the present circumstances of the case.
9. That the present service appeal is bad for mis-joinder & non-joinder of necessary and proper parties.

**OBJECTION ON FACTS:**

1. No comments.
2. Incorrect and not admitted. The appellant was appointed as a Warder in Prisons Department in 18/06/2022. After resuming the charge, the appellant absented himself time and again from official duties without prior permission of the competent authority as reported by the Superintendent District Jail Timergara vide his office letter No.533 dated 15/05/2024(**copy enclosed**). The appellant was granted 04 days casual leave on 02/05/2024 and the appellant was required to resume his duties on 07/05/2024 on expiry of his casual leave but he remained absent from duties time and again being belong to a sensitive force service wherein high condemned criminals are behind the bar in such like situation willful absence of the official is undesirable, unwarranted. Hence the appellant violated Rule 1082 of Khyber Pakhtunkhwa Prison Rules 2018 (**copy enclosed**). The appellant time and again absented himself from lawful duties without the permission of competent authority.
3. Incorrect and not admitted. Absence notice was served upon the appellant at his home address under Rule 9 of the Khyber Pakhtunkhwa E&D Rules 2011. The appellant was required to follow the procedure as laid down in Rule 1083 and Rules 1096 of Khyber Pakhtunkhwa Prison Rules 2018 (**copy enclosed**) which provide a mechanism for granting leave but the appellant violated of the above referred rules and does not follow the procedure as laid down therein.
4. Incorrect and not admitted. The appellant was appointed on 16/03/2022 (**copy enclosed**) and after serving 02 years and 03 months in Prison Department as Warder, was granted 4 days casual leave by the Superintendent District Jail Timergara vide his office letter referred above but after expiry of that very casual leave the appellant neither reported for duty nor submitted any application under the Rule ibid any proof of disease/illness to the competent authority. The appellant had willingly remained absent from the authorized duty without any prior

permission of the competent authority and left the station at his own will which amounts a serious misconduct on the part of appellant.

5. Incorrect and not admitted. An absence notice was served upon his home address vide Superintendent Circle Headquarter Prison Mardan being competent authority vide his office letter No.1322 dated 16/05/2024 **(copy enclosed)** to resume duty within 15 days positively to report to Superintendent District Jail positively. Accordingly the Superintendent District Jail Timergara has informed the Superintendent Headquarter Prison Mardan office letter No.646 dated 30/05/2024**(copy enclosed)** that the appellant concerned is still not reported for duty at this jail till date. As required under Rule 9 of the Khyber Pakhtunkhwa E&D Rules 2011, a request was sent to the Director Information of Khyber Pakhtunkhwa Peshawar vide Superintendent Circle HQ Prison Mardan office letter No.1436 dated 31/05/2024**(copy enclosed)** through registry. Accordingly, publication in Daily Aaj dated 05/06/2024**(copy enclosed)** and **daily Pakhtunkhwa News dated 05/06/2024(copy enclosed)** were issued with the direction to resume duty within 15 days to the Superintendent District Jail Timergara otherwise it will culminate of his Removal from Service. Despite of different publication, the said warder failed to resume his duty nor submitted his reply within stipulated time period and is absent up to date as reported by Superintendent District Jail Timergara vide his office letter No.806 dated 20/06/2024 **(copy enclosed)**. The Superintendent Circle Headquarter Prison Mardan being the competent authority in exercise of power conferred under Rule 9 of the Khyber Pakhtunkhwa E&D Rules 2011 awarded the major penalty of **Removal from Service** attached to District Jail Timergara vide Superintendent Circle Headquarter Prison Mardan office order No.1570 dated 20/06/2024 **(copy enclosed)** and copy of the said order was sent to the appellant through Registry for his information.
6. Admitted to the extent that the appellant preferred departmental appeal before Inspector General of Prisons Peshawar being appellant authority on 03/07/2024 and appellant was called for personal hearing vide Inspector General of Prison Khyber Pakhtunkhwa Peshawar office letter No.KC 29329 dated 24/07/2024 **(copy enclosed)** to appear for personal hearing. The appellate authority after hearing considered the charges, evidences/facts on record as well as the provision of rules in vogue in exercise of power conferred under Rule 17 of Khyber Pakhtunkhwa Government Servant E&D Rules 2011 read with Rule 5 of KP Service Appeal Rules 1986 upheld the decision of the competent authority and rejected his departmental appeal vide office order No. KC 32145 dated 07/08/2024 **(copy enclosed)** and the copy of said order was also sent to his home address for information and was also issued on the same day.
7. Incorrect and not admitted. The findings of the competent authority as well as the appellate authority were perfectly varied, based on careful and elaborate appraisal of evidence and the law.
8. Incorrect and not admitted. Detail is elaborated in Para-05 above.
9. Incorrect and not admitted. Detail is elaborated in Para-06 above.
10. No comments.

#### **OBJECTIONS ON GROUNDS:**

- A. No comments.
- B. Incorrect and not admitted. Detail of this Para is elaborated in Para-05 above of factual objections.
- C. Incorrect and not admitted. Detail of this Para is elaborated in Para-05 above of factual objections.
- D. Incorrect and not admitted. Detail of this Para is elaborated in Para-05 & 06 above of factual objections.
- E. Incorrect and not admitted. Detail of this Para is elaborated in Para-07 above of factual objections.
- F. Incorrect and not admitted. Detail of this Para is elaborated in Para-04,05 and 06 above of factual objections.

- G. Incorrect and not admitted. Detail of this Para is elaborated in Para-04,05 and 06 above of factual objections.
- H. No comments.
- I. Incorrect and not admitted. Detail of this Para is elaborated in Para-04,05 and 06 above of factual objections.
- J. Incorrect and not admitted. Detail of this Para is elaborated in Para-07 above of factual objections.
- K. No comments.
- L. Incorrect and not admitted. Detail of this Para is elaborated in Para-04,05 and 06 above of factual objections.
- M. Incorrect and not admitted. Detail of this Para is elaborated in Para-04,05 and 06 above of factual objections.
- N. The respondents would also seeks permission of this Honourable Tribunal to raise additional grounds at the time of arguments.

**PRAYER:**

It is therefore most humbly prayed that on acceptance of instant reply/comments on behalf of respondent No.1,2 and 3 the appeal of the appellant may kindly be dismissed with cost being devoid of merit and law.

Mr. MUHAMMAD USMAN

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA, PESHAWAR  
(Respondent No. 1)

Mr. NAJAM ABBASI

SUPERINTENDENT  
CIRCLE HEADQUARTERS PRISON MARDAN  
(Respondent No. 2)

Miss HALIMA IQBAL

ADDITIONAL INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR  
(Respondent No. 3)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

In the matter of Service Appeal No: 1677/2024

Filed by Islam-Ud-Din S/O Faqir Khan (Ex-Warder) attached at District Jail  
Timergara ..... (APPELLANT)

**VERSUS**

1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar
2. The Superintendent Circle Headquarter Prison Mardan
3. Additional Inspector General of Prisons Khyber Pakhtunkhwa Peshawar  
.....(RESPONDENTS)

**COUNTER AFFIDAVIT ON BEHALF OF THE RESPONDENTS No.1, 2 & 3.**

We, the following undersigned respondents do hereby solemnly affirm and declare that the contents of the 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 Honourable Service Tribunal. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defence have been struck off.

*Mr, MUHAMMAD USMAN*

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA, PESHAWAR  
(Respondent No. 1)

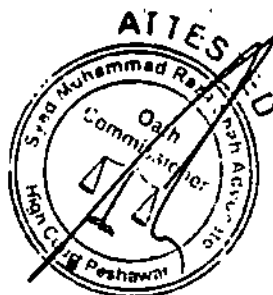
*Mr, NAJAM ABBASI*

SUPERINTENDENT  
CIRCLE HEADQUARTERS PRISON MARDAN  
(Respondent No. 2)

*Halima*

*Miss, HALIMA IQBAL*

ADDITIONAL INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR  
(Respondent No. 3)



15 NOV 2024

15/11/24

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

In the matter of Service Appeal No: 1677/2024

Filed by Islam-Ud-Din S/O Faqir Khan (Ex-Warder) attached at District Jail  
Timergara ..... (APPELLANT)

**VERSUS**

1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar
2. The Superintendent Circle Headquarter Prison Mardan
3. Additional Inspector General of Prisons Khyber Pakhtunkhwa Peshawar  
.....(RESPONDENTS)

**REPLY/COMMENTS AGAINST APPLICATION FOR CONDONATION OF  
DELAY ON BEHALF OF RESPONDENT NO.1,2 & 3**

11. This Para pertains to proceeding of this Honorable Service Tribunal, hence needs no comments.
12. Incorrect and not admitted. The impugned order was passed on 07/08/2024 and the same order was communicated to the appellant on that very day. The stance of the appellant was just to wash away the issue of limitation. The appellant was required to prefer a service appeal before this Tribunal within 30 days but after lapse of 19 days he preferred the subject service appeal which are barred by time of 19 days.
13. Incorrect and not admitted. Detail is elaborated in Para-02 above.
14. The factual objections as well as preliminary objection may be considered as integral part of this Para.
15. This Para does not relate to answering respondents hence needs no comments.
16. This Para does not relate to answering respondents hence needs no comments.
17. Incorrect and not admitted. The appeal in hand is barred by time and not maintainable and requested to be dismissed with cost.

**PRAYER:**

It is therefore most humbly prayed that on acceptance of instant reply/comments against application for condonation of delay on behalf of respondents No.1,2 and 3 the appeal of the appellant may kindly be dismissed with cost being devoid of merit and law.

Mr, MUHAMMAD USMAN  
SPL

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA, PESHAWAR  
(Respondent No. 1)

Mr, NAJAM ABBASI

SUPERINTENDENT  
CIRCLE HEADQUARTERS PRISON MARDAN  
(Respondent No. 2)

Miss, HALIMA IQBAL  
ADDITIONAL INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR  
(Respondent No. 3)



OFFICE OF THE  
SUPERINTENDENT

CIRCLE HQS. PRISON MARDAN

E-mail: [mardan10@gmail.com](mailto:mardan10@gmail.com)

Phone & Fax No. 0937-843114

No. \_\_\_\_\_ /PB Dated: 16/03/2022

### OFFER OF APPOINTMENT

Upon recommendation of the Departmental Selection Committee, the below noted candidates are hereby appointed against the post of Warders (BPS-07) from waiting list in the Khyber Pakhtunkhwa Prisons Department in Basic Pay Scale Rs. (10990-610-29290) plus other usual admissible allowances on the following terms and conditions:-

| S# | Name With Parentage              | District of Domicile | Place of Posting      |
|----|----------------------------------|----------------------|-----------------------|
| 1. | Mr. Ansar Shah S/O Amir Salam    | Upper Dir            | Central Prison Mardan |
| 2. | Mr. Mahed Khan S/O Gul Faraz     | Upper Dir            | Central Prison Mardan |
| 3. | Mr. Daud Shah S/O Saif Ur Rehman | Mardan               | Central Prison Mardan |
| 4. | Mr. Islam Ull Din S/O Fatch Khan | Upper Dir            | Central Prison Mardan |

### TERMS & CONDITIONS

- 1- Their appointment will take effect from the date of joining duty at their place of posting.
- 2- Their appointment is purely temporary and their services are liable to be terminated at any time on 15 days' notice without assigning any reasons.
- 3- No TA, DA will be admissible to them for joining first appointment.
- 4- In case they wish to resign at any time they will give one month notice OR in lieu thereof one month's pay will be forfeited from them subject to the discretion of the competent authority in public interest and will leave the service after acceptance of their resignation.
- 5- Their appointment is subject to Medical fitness for Government Service Hospital.
- 6- They will be eligible for continuance on the post if their work and conduct remained satisfactory during the period of their temporary appointment provided the vacancy against which they have been appointed continues.
- 7- They will be on probation for a period of one year extensible up to another year. During probation period their services will be terminated if their work and conduct is not found satisfactory OR the vacancy ceases to exist.
- 8- They will be liable to serve anywhere in the Prisons Department of Khyber Pakhtunkhwa.
- 9- For all other purposes such as Pay, T.A and Medical Attendance etc; they will be governed by such Rules as may be issued by the Government for the category of Government Servants of the Prisons Department to which they will belong.
- 10- They will be governed by the Khyber Pakhtunkhwa Government Servants (Conduct) Rules 1987, the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules 1986, the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the Khyber Pakhtunkhwa (E&D) Rules, 2011 the Khyber Pakhtunkhwa Prison Department Service Rules and all other rules / regulations framed or to be framed by the Government from time to time.
- 11- Their service will be liable to termination / reversion at any stage if their Academic Certificates / Degrees (if any), CNIC, Domicile etc; are found fake, their services will be considered as terminated automatically and FIR will be lodged against them.
- 12- If they accept the appointment on the above elted terms and conditions, they should report to the Superintendent Central Prison Mardan within 30 (Thirty) days of the receipt of this offer of appointment at their own expense. In case they fail to join duty within the same period, the offer of appointment will be treated as cancelled / withdrawn.

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

## نوٹس غیر حاضری

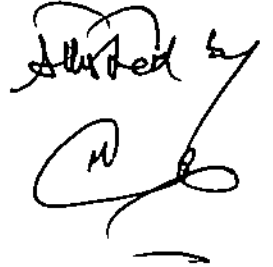
آپ مسی اسلام الدین ولد فاتح خان سکنہ گاؤں وڈا کمانہ چکیاتن، ضلع دیر اپر:- بطور جیل وارڈر آپ کو بمطابق سپرنٹنڈنٹ ڈسٹرکٹ جیل کراچی تیسر گره کے مورخہ 02.05.2024 کو چار (04) دن رخصتی ضروری پر چھوڑا گیا تھا اور آپ کی حاضری مورخہ 07.05.2024 کو بنتی تھی لیکن آپ حاضر نہ ہوئے۔ آپ کو سرکل ہیڈ کوارٹر جیل مردان نوٹس نمبر 1322/PB مورخہ 16.05.2024 کو بذریعہ رجسٹر ڈاک سروس بک پر دیئے گئے گھر کے پتہ پر ہدایت کی گئی کہ پندرہ {15} ایام کے اندر اندر ڈسٹرکٹ جیل تیسر گره میں حاضری کریں لیکن آپ پھر بھی حاضر نہ ہوئے۔ لہذا آپ کو بذریعہ نوٹس ہذا آخری بار ہدایت کی جاتی ہے کہ پندرہ {15} ایام کے اندر اندر حاضری کی رپورٹ ڈسٹرکٹ جیل تیسر گره میں کریں اور اپنی غیر حاضری کی معقول وجہ بتائیں بصورت دیگر آپ کے خلاف یکطرفہ قانونی کارروائی عمل میں لائی جائیگی جو کہ ملازمت سے برخاستگی پر منتج ہو سکتی ہے۔



محمد عارف خان

سپرٹنڈنٹ

سرکل ہیڈ کوارٹر جیل مردان





THE  
DISTRICT JAIL MARDAN  
mail.com  
114  
105/2024



OFFICE OF THE  
SUPERINTENDENT  
DISTRICT JAIL TIMERGARA  
Phone/Fax: 0945-9250095  
Email: [districtjailtimergara@gmail.com](mailto:districtjailtimergara@gmail.com)

No. 583/1 Dated: 18/05/2024

To,  
The Superintendent,  
Circle Headquarter Jail Mardan.

Subject: **ABSENCE NOTICE.**

Memo,

It is to state that warder (BPS-07) Islam Ud Din S/o Fateh Khan was granted four (04) days causal leave on 02.05.2024 AN and he was required to resume his duties on 07.05.2024 on expiry of his causal leave. But he failed to report for duty and is absent from duties up to date.

It is therefore requested that an absence Notice may be served to the warder concerned at his home address under rule 09 of the Khyber Pakhtunkhwa Government servant (Efficiency & Discipline) rules 2011 please.

Name with Parentage:- Islam Ud Din S/o Fateh Khan  
Date of appointment:- 18.03.2022.  
Postal address:- Village & P/O Chukyatan District Dir Upper.

*Checked by*

SUPERINTENDENT  
DISTRICT JAIL TIMERGARA

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

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

-sd-  
SUPERINTENDENT  
DISTRICT JAIL TIMERGARA

NOTE SHEET

(31)

Subject: **ABSENCE NOTICE**

R/Sir;

It is submitted that as per report of Superintendent District Jail Timergara vide his office letter No. 533 dated. 15-05-2024 that Warder (BPS-07) **Islam Ud Din S/O Fateh Khan** attached to District Jail Timergara was granted four (04) days casual leave on 02-05-2024 and he was required to resume his duties on 07-05-2024 on expiry of his casual leave. But he failed to report for duty and is absent from duties up to date.

Superintendent District Jail Timergara requested that an absence notice may be served to the warder concerned at his home address under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011.

Submitted for further orders, please.

*Mudaly*  
*AD*

*GK*  
I/C/PB

*Absent notice to be issued*

*DS*  
*16/5/24*

REGISTERED



OFFICE OF THE SUPERINTENDENT CIRCLE HQS. PRISON MARDAN

Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan

No. 1322 /PB Dated: 16/05/2024, E-Mail: mardanjail@gmail.com, 0937-843114  
To

Islam Ud Din S/O Fateh Khan (Warder BPS-07),  
R/O: Village & Post Office Chukyatan, District Dir Upper.

**Subject: ABSENCE NOTICE.**

As reported by the Superintendent District Jail Timergara, that you were granted four (04) days casual leave on 02-05-2024 (A.N) an was required to resume your duties on 07-05-2024 on expiry of your casual leave. But you failed to report for duty and is absent from duties up to date, hence you violated rule 1082(i) of Khyber Pakhtunkhwa Prison rules.

You are therefore directed to report to Superintendent District Jail Timergara within fifteen (15) days of the receipt of this Notice and explain then reasons of your absence otherwise strict disciplinary action will be taken against you under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011.

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

Endst. No: 1323-24 /Dated: 16/05/2024.  
Copy of the above is forwarded to:-

- 1- The Inspector General of Prison Khyber Pakhtunkhwa, Peshawar for information, please.
- 2- The Superintendent District Jail Timergara for information with references to his office letter No. 533 dated. 15-05-2024, please.

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN  
15/5/24

No. 1579 RGL117478879

For ~~insurance purposes~~ see reverse.  
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered\* addressed to Islam Ud Din Stamp

Initials of Receiving Officer Fateh Khan with the word "insured" before if necessary.

Insured for Rs. 2000 (in words)

Insurance fee Rs. 200 Ps. 100 Weight 100 Kilo

Name and address of sender Islam Ud Din

If insured.

REGISTERED



(3:1)  
13

OFFICE OF THE SUPERINTENDENT CIRCLE HQS: PRISON MARDAN

No: 1322 /PB Dated: 16/05/2024, E-Mail: mardanjail@gmail.com, 0937-843114  
To

✓ Islam Ud Din S/O Fateh Khan (Warder BPS-07),  
R/O: Village & Post: Office Chukyatan, District Dir Upper.

**Subject: ABSENCE NOTICE**

As reported by the Superintendent District Jail Timergara, that you were granted four (04) days casual leave on 02-05-2024 (A/N) and was required to resume your duties on 07-05-2024 on expiry of your casual leave. But you failed to report for duty and is absent from duties up to date, hence you violated rule 1082(i) of Khyber Pakhtunkhwa Prison rules.

You are therefore directed to report to Superintendent District Jail Timergara within fifteen (15) days of the receipt of this Notice and explain then reasons of your absence otherwise strict disciplinary action will be taken against you under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011.

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

Endst. No: \_\_\_\_\_ / Dated: \_\_\_\_\_ /05/2024

Copy of the above is forwarded to:

- 1- The Inspector General of Prison Khyber Pakhtunkhwa, Peshawar for information, please.
- 2- The Superintendent District Jail Timergara for information with references to his office letter No 533 dated 15-05-2024, please.

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

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addn  
Initia



OFFICE OF THE  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

0937-843114  
E-Mail: mardanjail@gmail.com

No. 1422 /PB Dated: 30 /05/2024

To,

The Superintendent,  
District Jail Timergara.

**SUBJECT: ABSENCE NOTICE/DISCIPLINARY ACTION.**

Memo;

Reference to your office letter No. 533 dated 15.05.2024 on the subject noted above.

It is stated that the information regarding the arrival of **Warder Islam Ud Din S/O Fateh Khan** for duty be intimated by today through Fax/Email for further necessary action by this headquarter please.

*Handwritten signature*

*Handwritten signature*  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN



OFFICE OF THE  
SUPERINTENDENT  
DISTRICT JAIL TIMERGARA

Phone/Fax: 0945-9250095

Email: [districtjailtimergara@gmail.com](mailto:districtjailtimergara@gmail.com)

No. 646 / Dated: 30/05/2024

To,

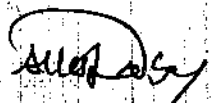
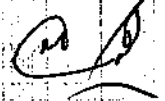
The Superintendent,  
Circle Headquarter Prison Mardan.

Subject: ABSENCE NOTICE/DISCIPLINARY ACTION.  
Memo,

Reference yours office letter No.1422/PB dated 30.05.2024.

It is to state that warder (BPS-07) Islam Uddin s/o Fatch Khan is not reported for  
duty at this Jail, till date.

  
SUPERINTENDENT  
DISTRICT JAIL TIMERGARA

NOTE SHEET

Subject: ABSENCE NOTICE TO BE ADVERTISED IN NEWSPAPERS

R/Sir;

It is submitted that as per report of Superintendent District Jail Timergara vide his office letter. No. 533 dated. 15-05-2024 that Warder (BPS-07) **Islam Ud Din S/O Fateh Khan** attached to District Jail Timergara was granted four (04) days casual leave on 02-05-2024 and he was required to resume his duties on 07-05-2024 on expiry of his casual leave. But he failed to report for duty, served with absent notice vide this office No. 1322/PB dated. 16.05.2024 on his home address with no response, after lapse of 15 days' time period as reported by Superintendent District Jail Timergara vide his office letter No. 646 dated 30.05.2024.

Notice for resuming his duties in newspaper is required to be published in leading newspapers as required under the Khyber Pakhtunkhwa Government Servant (Efficiency Discipline) Rules 2011 to proceed further in the case if agreed, please.

Submitted for further orders, please.

I/C PB

Advertisement in  
two local newspapers  
as per B & A notes.

31/5/24

DS



REGISTERED

OFFICE OF THE  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN  
Email. [mardanjail@gmail.com](mailto:mardanjail@gmail.com)  
Phone: 0937-843114

273

No. 1436 -WE/PB Dated: 31/05/2024

To,

The Director of Information,  
Khyber Pakhtunkhwa Peshawar.

Subject: **ADVERTISEMENT.**  
Memo,

Enclosed please find herewith 07 copies of the notice for publication in the leading newspapers each in English and Urdu.

Bill of cost may please be sent to this office for its payment accordingly.

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

Endst: No. 1437-38 -WE/. Dated: 31/05/2024.

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 with reference to his office letters No. 533 dated 15.05.2024 and No. 646 dated 30.05.2024, please.

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

For Insur Stamps RGL124359686/

uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered\* addressed to \_\_\_\_\_ Date Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_

Insured for Rs. (in figures) \_\_\_\_\_

Insurance fee Rs. \_\_\_\_\_

Name and address \_\_\_\_\_

Weight \_\_\_\_\_

Post Office \_\_\_\_\_



27

# نوٹس غائبی



آپ مسی اسلام الدین ولد فاتح خان سکنہ گاؤں وڈا کھانہ چکیا تن، ضلع دیرا پور - بٹور  
 جیل وارڈر آپ کو برطابق سپرنٹنڈنٹ ڈسٹرکٹ جیل تیمرگرہ کے مورخہ 02.05.2024 کو  
 چار (04) دن رخصتی ضروری پر چھوڑا گیا تھا اور آپ کی حاضری مورخہ 07.05.2024 کو  
 بنتی تھی لیکن آپ حاضر نہ ہوئے۔ آپ کو سرکل ہیڈ کوارٹر جیل مردان نوٹس نمبر 1322/PB  
 مورخہ 16.05.2024 کو بذریعہ رجسٹرڈ ڈاک سروس بک پر دیئے گئے گھر کے پتے پر  
 ہدایت کی گئی کہ پندرہ (15) ایام کے اندر اندر ڈسٹرکٹ جیل تیمرگرہ میں حاضری کریں لیکن  
 آپ پھر بھی حاضر نہ ہوئے۔ لہذا آپ کو بذریعہ نوٹس ہذا آخری بار ہدایت کی جاتی ہے کہ پندرہ

(15) ایام کے اندر اندر حاضری کی رپورٹ ڈسٹرکٹ جیل تیمرگرہ میں لیں ورنہ  
 غیر حاضری کی معقول وجہ بنا لیں بصورت دیگر آپ کے خلاف سیکورڈ قانونی کارروائی عمل  
 میں لائی جاسکتی جو کہ ملازمت سے برخواستگی پر منتج ہو سکتی ہے۔

INF(P) 119/24

**محمد عارف خان (سپرنٹنڈنٹ) سرکل ہیڈ کوارٹر جیل، مردان**  
 بعدالت جناب امجد العجاز الرحمن فاضلی ADJ XVII حب پشاور

Handwritten signature and initials

پشاور لیٹ آبل اور اسلام آباد سے یکدمت شائع ہونے والا کثیر الشامت قومی روزنامہ

روزنامہ کی مناسبت اور نام

روزنامہ

پشاور

پاکستان

بانی  
عبدالواحد یوسفی

جلد 35، نمبر 27، تاریخ 27-05-2024، صفحہ نمبر 30، قیمت 148 روپے

# نوٹس غیر حاضری



آپ مسمی اسلام الدین ولد فاتح خان سکنہ گاؤں وڈا کھانہ چکیاتن، ضلع دیر اپر:- بطور جیل وارڈر آپ کو بمطابق سپرنٹنڈنٹ ڈسٹرکٹ جیل تیمرگرہ کے مورخہ 02.05.2024 کو چار (04) دن رخصتی ضروری پر چھوڑا گیا تھا اور آپ کی حاضری مورخہ 07.05.2024 کو بنی تھی لیکن آپ حاضر نہ ہوئے۔ آپ کو سرکل ہیڈ کوارٹر جیل مردان نوٹس نمبر 1322/PB مورخہ 16.05.2024 کو بذریعہ رجسٹرڈ ڈاک سروس بک پر دیئے گئے گھر کے پتہ پر ہدایت کی گئی کہ پندرہ (15) ایام کے اندر اندر ڈسٹرکٹ جیل تیمرگرہ میں حاضری کریں لیکن آپ پھر بھی حاضر نہ ہوئے۔ لہذا آپ کو بذریعہ نوٹس ہذا آخری بار ہدایت کی جاتی ہے کہ پندرہ (15) ایام کے اندر اندر حاضری کی رپورٹ ڈسٹرکٹ جیل تیمرگرہ میں کریں اور اپنی غیر حاضری کی معقول وجہ بتائیں بصورت دیگر آپ کے خلاف یکطرفہ قانونی کارروائی عمل میں لائی جائیگی جو کہ ملازمت سے برخاستگی پر منتج ہو سکتی ہے۔

INF(P)#1198/24

محمد عارف خان (سپرنٹنڈنٹ) سرکل ہیڈ کوارٹر جیل، مردان

Daily "Pakhtunkhwa News" Mardan

ABC  
Certified

مردان  
پاکستان

ہر خبر آپ کی خبر

آزاد کشمیر

# پاکتھونخوا نیوز

بیجاٹ پور، پشاور

شمارہ نمبر 203

جلد نمبر 11

جلد نمبر 11

## نوٹس غیر حاضری



آپ سہمی اسلام الدین ولد فاتح خان سکنہ گاؤں وڈا کھانہ چکیاتن، ضلع دیر اپر:- بطور  
جیل وارڈر آپ کو بمطابق سپرنٹنڈنٹ ڈسٹرکٹ جیل تھرگرہ کے مورخہ 02.05.2024 کو  
چار (04) دن رخصتی ضروری پر چھوڑا گیا تھا اور آپ کی حاضری مورخہ 07.05.2024 کو  
بنتی تھی لیکن آپ حاضرنہ ہوئے۔ آپ کو سرکل ہیڈ کوارٹر جیل مردان نوٹس نمبر 1322 / PB  
مورخہ 16.05.2024 کو بذریعہ رجسٹرڈ ڈاک سروس بک پر دیئے گئے گھر کے پتہ پر  
ہدایت کی گئی کہ پندرہ (15) ایام کے اندر اندر ڈسٹرکٹ جیل تھرگرہ میں حاضری کریں لیکن  
آپ پھر بھی حاضرنہ ہوئے۔ لہذا آپ کو بذریعہ نوٹس ہذا آخری بار ہدایت کی جاتی ہے کہ پندرہ  
(15) ایام کے اندر اندر حاضری کی رپورٹ ڈسٹرکٹ جیل تھرگرہ میں کریں اور اپنی  
غیر حاضری کی معقول وجہ بتائیں بصورت دیگر آپ کے خلاف یکطرفہ قانونی کارروائی عمل  
میں لائی جائیگی جو کہ ملازمت سے برخواستگی پر منتج ہو سکتی ہے۔  
INF(P)#1198/24

محمد عارف خان (سپرنٹنڈنٹ) سرکل ہیڈ کوارٹر جیل، مردان

اللہ  
ع



OFFICE OF THE  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN  
0937-843114  
E-Mail: mardanjail@gmail.com  
No. 1561 /PB Dated: 20/06/2024

To,

The Superintendent,  
District Jail Timergara.

**SUBJECT: ABSENCE NOTICE/DISCIPLINARY ACTION.**

Memo;

Reference to your office letters No. 533 dated 15.05.2024 and No. 646 dated 30.05.2024 on the subject noted above.

It is stated that information regarding the arrival of **Warder Islam Ud Din S/O Fateh Khan** for duty be intimated by today through Fax/Email for further necessary action by this headquarter please.

Endst No. 1562 / - Dated: 20/06/2024

Copy of the above is forwarded to the Superintendent Sub Jail Dir Upper for information and similar necessary action, please.

*[Signature]*  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

*[Signature]*  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

*[Signature]*  
*[Signature]*



16

OFFICE OF THE  
SUPERINTENDENT  
DISTRICT JAIL TIMERGARA  
Phone/Fax: 0945-9250095  
Email: [districtjailtimergara@gmail.com](mailto:districtjailtimergara@gmail.com)

No. 8061 Dated: 20/06/2024.

To

The Superintendent,  
Headquarter Jail Mardan.

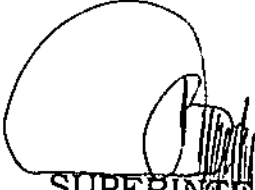

Subject: ABSENCE NOTICE/DISCIPLINARY ACTION.


Memo,

Reference your letter No.1561/PB dated 20.06.2024

It is to state that warder (BPS-07) Islam Uddin s/o Fateh Khan attached to this jail has not been reported for duty and still absented till date please.

*Islam Uddin*  
*CP*

  
SUPERINTENDENT  
DISTRICT JAIL TIMERGARA  


*1625 (3)*  
*28/6-29*  
*DS/CP P.B*  


NOTE SHEET

15

ir;

It is submitted that as per report of Superintendent District Jail Timergara vide his office letter No. 533 dated. 15-05-2024 that Warder (BPS-07) **Islam Ud Din S/O Fateh Khan** attached to District Jail Timergara was granted four (04) days casual leave on 02-05-2024 and he was required to resume his duties on 07-05-2024 on expiry of his casual leave. But he failed to report for duty, served with absent notice vide this office No. 1322/PB dated. 16.05.2024 on his home address with no response, after lapse of 15 days' time period as reported by Superintendent District Jail Timergara vide his office letter No. 646 dated 30.05.2024.

Absence Notice in newspapers were published in Daily "Aaj" Peshawar and Daily "Pakhtunkhwa News" Mardan on 05-06-2024, but the said warder failed to resume his duty nor submitted his reply within stipulated time period and is absent upto date as reported by Superintendent District Jail Timergara vide his office letter No. 806 dated 20.06.2024.

*Shahid*  
*DS*

Submitted for further orders as deemed appropriate, please.

*SK*  
I/C PB

*MA*  
DS

*1/C PB*

*Removal*  
*20/6*



OFFICE OF THE SUPERINTENDENT CIRCLE HQS. PRISON MARDAN

No. \_\_\_\_\_ /PB Dated: 20/06/2024, E-Mail: mardanjail@gmail.com,



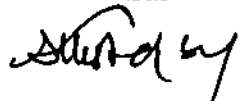
0937-843114

**OFFICE ORDER**

WHEREAS, Mr. Islam Ud Din S/O Fateh Khan Warder (BPS-07) attached to District Jail Timergara absented himself from duty with effect from 07-05-2024 till date without prior permission of the competent authority as reported by Superintendent District Jail Timergara vide his office letter No. 533 dated 15.05.2024. A notice was also served on him at his home address vide this office letter No. 1322/PB dated 16.05.2024 with the direction to resume his duties immediately failing which disciplinary action could be initiated against him under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

AND WHEREAS, after expiry of more than 15 days period, the said official neither resumed duty nor any intimation was received from him, therefore, as required under Rule-09 of ibid rules, a notice was published in two daily newspapers i.e. Daily "Aaj" Peshawar and Daily "Pakhtunkhwa News" Mardan on 05-06-2024 by directing him to resume duty within 15 days of publication of the notice. But after lapse of stipulated period given in the notice, he neither resumed his duty nor any response was received from his end as confirmed by Superintendent District Jail Timergara vide his office letter No. 806 dated 20-06-2024.


NOW THEREFORE, in exercise of powers conferred under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, the undersigned being competent authority, hereby awards major penalty of "Removal from Service" to Mr. Islam Ud Din S/O Fateh Khan Warder (BPS-07) attached to District Jail Timergara from the date of his wilful absence i.e. 07.05.2024.

  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

Endst: No. 1571-74 / . Dated: 20/06/2024.

Copy of the above is forwarded to:-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information, please.
2. The Superintendent District Jail Timergara, for information and necessary action with reference to his office letter No. 533 dated 15.05.2024, No. 646 dated 30.05.2024 and No. 806 dated 20.06.2024, please.
3. The District Accounts Officer, Timergara for information and necessary action please.
4. Islam Ud Din S/O Fateh Khan, R/O Village & Post Office Chukyatan, District Dir Upper, for information.

  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN



OFFICE OF THE SUPERINTENDENT, CIRCLE HQS. PRISON MARDAN

Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan

1570 /PB Dated: 20/06/2024, E-Mail: mardanjail@gmail.com,



0937-843114

**OFFICE ORDER**

**WHEREAS**, Mr. Islam Ud Din S/O Fateh Khan Warder (BPS-07) attached to District Jail Timergara absented himself from duty with effect from 07-05-2024 till date without prior permission of the competent authority as reported by Superintendent District Jail Timergara vide his office letter No. 533 dated 15.05.2024. A notice was also served on him at his home address vide this office letter No. 1322/PB dated 16.05.2024 with the direction to resume his duties immediately failing which disciplinary action could be initiated against him under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

**AND WHEREAS**, after expiry of more than 15 days period, the said official neither resumed duty nor any intimation was received from him, therefore, as required under Rule-09 of ibid rules, a notice was published in two daily newspapers i.e. Daily "Aaj" Peshawar and Daily "Pakhtunkhwa News" Mardan on 05-06-2024 by directing him to resume duty within 15 days of publication of the notice. But after lapse of stipulated period given in the notice, he neither resumed his duty nor any response was received from his end as confirmed by Superintendent District Jail Timergara vide his office letter No. 806 dated 20-06-2024.

**NOW THEREFORE**, in exercise of powers conferred under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, the undersigned being competent authority, hereby awards major penalty of "Removal from Service" to Mr. Islam Ud Din S/O Fateh Khan Warder (BPS-07) attached to District Jail Timergara from the date of his wilful absence i.e. 07.05.2024.

*[Signature]*  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

Endst: No. 1571-74 / . Dated: 20/06/2024.

Copy of the above is forwarded to:-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information, please.
2. The Superintendent District Jail Timergara, for information and necessary action with reference to his office letter No. 533 dated 15.05.2024, No. 646 dated 30.05.2024 and No. 806 : dated 20.06.2024, please.

Accounts Officer, Timergara for information and necessary action please.

at Office Chukyatan, District Dir Upper, for

179 RGL124220326

For Insurance Notices see reverse. Stamps affixed except in case of insured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered addressed to \_\_\_\_\_ Date-Stamp \_\_\_\_\_

\*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before if necessary.

Insured for Rs. (in figures) 100 (in words) \_\_\_\_\_

Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ Weight } Kilo Grams

Name and address of sender \_\_\_\_\_

*[Signature]*  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN





بخدمت جناب انی جی جیل خانہ جات خیبر پختون خواہ بمقام پشاور

درخواست بر اصدور حکم بحالی بحیثیت وارڈر جیل خانہ (BPS-07) بوجوہات ذیل

جناب عالی! ذیل عرض ہے۔

یہ کہ سائیل دیہہ چکیا تن تحصیل در ضلع دیر بالا کا مستقل باشندہ ہے۔

یہ کہ سائیل محکمہ جیل خانہ جات میں بحیثیت وارڈر سال 2022 میں بھرتی ہوا تھا۔

یہ کہ سائیل اپنے گھر کا واحد ذمہ دار فرد ہے اور اپنے کلبے کا تمام بوجھ سائیل پر ہے۔

یہ کہ سائیل خود SGPT اور ذہنی بیماری میں مبتلا ہوا تھا۔ (نقولات لف ہیں)

یہ کہ سائیل تاحال بے روزگار ہے اور کسی دیگر محکمہ میں تعینات نہیں ہوا ہے۔

یہ کہ سائیل اپنی ڈیوٹی پر واپس بحال ہونے کا خواہاں ہے۔

یہ کہ سائیل اپنی ڈیوٹی پوری ایمانداری کیساتھ انجام دوںگا۔

یہ کہ سائیل ٹریننگ شدہ سپاہی ہے اور سائیل کو واپس بحالی کرنا عین قانون و قرین انصاف ہے۔

لہذا استدعا ہے کہ سائیل کو واپس بحیثیت وارڈر بحال کرنے کے احکامات صادر فرمائیں۔

سائیل تاعمر ذکا گور ہیگا۔

محمد اسحاق  
م

مورخہ 02/07/2024

سائیل: اپکا تابعدار

اسلام الدین ولد فاتح خان سکنہ چکیا تن تحصیل در ضلع دیر بالا

رابطہ نمبر 0316-5621978



**INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR**

091-9210334, 9210406 091-9213445

No. ICC - 27739 /-WE

Dated. 04-07-2024 /- 10

*Recd*

To,

The Superintendent,  
Circle Headquarters Prison Mardan

Subject: **DEPARTMENTAL APPEAL**  
Memo:

I am directed to refer to the subject and to forward herewith a copy of application / appeal dated 02-07-2024 (self-explanatory) submitted by Ex-Warder, Islam Ud Din S/O Fateh Khan attached to District Jail Timergara on the captioned subject for information.

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

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

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

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

Copy of the above is forwarded to the PS to I.G Prisons Khyber Pakhtunkhw Peshawar.

**ASSISTANT DIRECTOR  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR**

*[Signature]*

*1769*  
*9/7-29*  
*[Signature]*  
*PS/umer*



1837

# OFFICE OF THE SUPERINTENDENT CIRCLE HQS. PRISON MARDAN

Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan Circle HQs Mardan

No. 1837 /PB Dated: 09/07/2024, E-Mail: mardanjail@gmail.com, 0937-843114

The Superintendent,  
District Jail Timergara.

Subject: **DEPARTMENTAL APPEAL**

Memo;

Reference to the Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar office letter No. 27739/WE dated. 04.07.2024 on the subject noted above.

Information about Ex-Warder Islam Ud Din S/O Fateh Khan attached to your jail may please be furnished from his service book on the below noted format by **today positively** through **fax/email** for further submission to the quarter concerned, please.

| S.No | Name & Parentage | Rank | Date of Birth | Date of Appointment | Details of postings | Penalty if any awarded |
|------|------------------|------|---------------|---------------------|---------------------|------------------------|
|      |                  |      |               |                     |                     |                        |

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN

Endst No. 1838 / . Dated: 09/07/2024

Copy of the above is forwarded to the Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar for information with reference to his office letter No. referred to above please.

SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN



OFFICE OF THE  
SUPERINTENDENT  
DISTRICT JAIL TIMERGARA  
Phone/Fax: 0945-9250095  
Email: [districtjailtimergara@gmail.com](mailto:districtjailtimergara@gmail.com)

No. 9081 Dated: 10/07/2024

To,

The Superintendent Circle HQs Prison  
Mardan..

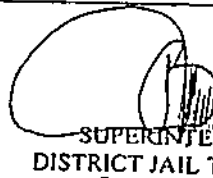
Subject: Departmental Appeal

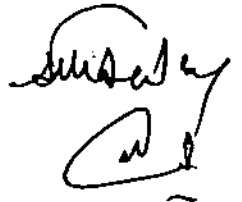
Memo,

Reference letter No. 1837 dated 09.07.2024

It is submitted that requisite information regarding Ex- warden Islam Uddin s/o Fateh Khan is  
under please.

|   |                        |  |   |
|---|------------------------|--|---|
| 1 | Name with Parentage    | Islam Uddin S/O Fateh Khan                     |   |
| 2 | Rank                   | Warder (BPS-07)                                |   |
| 3 | Date of Birth          | 24.03.1997                                     |   |
| 4 | Date of Appointment    | 18.03.2022                                     |   |
| 5 | Detail of posting      | Mardan Period<br>18.03.2022 to<br>06.08.2022   | Timergara Period<br>14.08.2022 to<br>20.06.2024 |
| 6 | Penalty if any awarded | Removal from service due to willful<br>absence |   |

  
SUPERINTENDENT  
DISTRICT JAIL TIMERGARA





32-11

7

OFFICE OF THE SUPERINTENDENT CIRCLE HQS. PRISON MARDAN

1891 -WE/PB Dated: 11/07/2024, E-Mail: mardanjail@gmail.com, Phone and Fax: 0937-843114

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

Subject: **DEPARTMENTAL APPEAL.**

R/Sir:

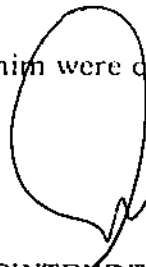


Reference to your good office letter No. 27739-WE dated. 04-07-2024 on the subject cited above.

Information regarding the Departmental appeal of the Ex-Warder Islam Ud Din S/O Fateh Khan on the prescribed format is as under, please.

|   |                        |  |              |            |            |
|---|------------------------|--|--------------|------------|------------|
| 1 | Name with Parentage    | Islam Ud Din S/O Fateh Khan  |              |            |            |
| 2 | Rank                   | Warder (BPS-07)  |              |            |            |
| 3 | Date of Birth          | 24-03-1997   |              |            |            |
| 4 | Date of Appointment    | 18-03-2022   |              |            |            |
| 5 | Detail of postings     | S#   | Name of Jail | From       | To         |
|   |                        | 01   | CP Mardan    | 18-03-2022 | 06-08-2022 |
|   |                        | 02   | DJ Timergara | 14-08-2022 | 20-06-2024 |
| 6 | Penalty if any awarded | "Removal from Service" w.e.f 07-05-2024 on the grounds of misconduct/wilful absence under Rule-09 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. |              |            |            |

The appellant was awarded the major penalty of "Removal from Service" w.e.f 07-05-2024 on the grounds of misconduct/wilful absence under Rule-09 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, after observing proper procedure and completion of all legal formalities. **(Copies attached)**

Therefore, his appeal may kindly be rejected as proceedings against him were conducted strictly in accordance with rules, please.

  
  
  
SUPERINTENDENT  
CIRCLE HQS. PRISON MARDAN





BY FAX

INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No. ICL - 29329 /-

Dated. 24-07-2024 /-

5

To,

The Superintendent,  
Circle Headquarters Prison Mardan

Subject: DEPARTMENTAL APPEAL  
Memo;

I am directed to refer to your letter No. 1891 dated 11-07-2024 on the subject and to convey that Ex-Warder, Islam Ud Din S/O Fateh Khan may be directed to appear before the Addl: Inspector General of Prisons (HQs) Khyber Pakhtunkhwa Peshawar on 06-08-2024 at 11:00 AM (Tuesday) for personal hearing in the instant case. Also depute a well conversant officer alongwith Service Book as well as original record of the case to attend this office on the date and time fixed above please.

ASSISTANT DIRECTOR  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

Endst; No. \_\_\_\_\_ /-

Copy of the above is forwarded for information to the:

1. PS to I.G, Prisons Khyber Pakhtunkhwa Peshawar.
2. PA to Addl: Inspector General of Prisons (HQs) Khyber Pakhtunkhwa Peshawar.

ASSISTANT DIRECTOR  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

Supdt  
30/7/24 DNo 1940.





OFFICE OF THE *Armedy E-30*  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

☎ 091-9210334, 9210406 ☎ 091-9213445

No. Estb/Ward/Orders/ *KC 32145*

Dated *07-08-2024*

**ORDER:**

**WHEREAS**, Ex-Warder Islam Ud Din S/O Fateh Khan posted at District Jail Timergara was awarded the major penalty of "Removal from Service" by Superintendent HQs Prison Mardan vide order No. 1570/PB dated 20-06-2024 due to his willful absence w.e.f 07-05-2024.

**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**, he was afforded an opportunity of personal hearing on 06-08-2024. 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 in accordance with the rules and after observing all legal and codal formalities as required under Government Servants (Efficiency & Discipline) Rules, 2011. During the course of hearing, the appellant failed to justify his innocence.

**NOW THEREFORE**, having considered the charges, evidences/facts on record, as well as 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 without any substance & facts and devoid of merit.

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

ENDST: NO. *32146-49*

Copy of the above is forwarded to the:

1. Superintendent Headquarters Prison Mardan for information and w/r to his letter No. 1891/WE/PB dated 11-07-2024.
2. Superintendent District Jail Timergara for information and necessary action. He is directed to inform the appellant accordingly and also make necessary entry in his Service Book under proper attestation.
3. Mr. Islam Ud Din S/O Fateh Khan resident of Chakyatan Tehsil and District Dir Upper (Cell No. 0316-5621978) for information.
4. PS to Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.

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

*[Signature]*  
*07/08/2024*



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