

28.07.2022

Deposited  
Security & Process Fee

Appellant present through counsel.

File to come up alongwith connected Service Appeal No.83/2022 titled "Saddam Hussain Vs. Government of Khyber Pakhtunkhwa" on 17.10.2022 before S.B.


  
(Rozina Rehman)  
Member (J)

17.10.2022

Appellant present through counsel.

Naseer Ud Din Shah, learned Assistant Advocate General for respondents present.

File to come up alongwith connected Service Appeal No.83/2022 titled "Saddam Hussain Vs. Government of Khyber Pakhtunkhwa" on 18.11.2022 before S.B.





  
(Rozina Rehman)  
Member (J)

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 97/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/01/2022	<p>The appeal of Mr. Zakeria Khan resubmitted today by Mr. Bashir Khan Wazir Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>07/03/22</u>.</p> <p> CHAIRMAN</p>
07.03.2022		<p>Due to retirement of the Hon'able Chairman, the case is adjourned to 07].06.2022 for the same as before.</p> <p> Reader</p>
	07.06.2022	<p>Junior to counsel for the appellant present.</p> <p>Lawyers are on general strike, therefore, case is adjourned to 28.07.2022 for preliminary hearing before S.B.</p> <p> (Rozina Rehman) Member(J)</p>

The appeal of Mr. Zakeria Khan, JCT Pharmacy, DHO North Waziristan received today i.e. on 07.12.2021 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

1. Memo of the appeal contains cutting/erasing which is not accepted.
2. Annexures of the appeal may be attested.
3. Annexures of the appeal is not in sequence which may be placed in order.
4. Copy of call letter mentioned in para-3 annexed as annexure B is not attached with the appeal which may be placed on it.
5. Copy of impugned order mentioned in para-6 annexed as annexure B is not attached with the appeal which may be placed on it.
6. Copy of departmental appeal which was forwarded through letter dated 05-07-2021 mentioned in para-13 is not attached with the appeal which may be placed on it.
7. Annexures L and M is missing.
8. Pages 17, 18, 20, 25, 26 and 27 attached with the appeal are illegible which may be replaced by legible/better one.

No. 2414 /S.T,

Dt. 07/12 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Bashir Khan Wazir Adv. Pesh.

Sir,

Objection removed and resubmitted again  
Please find before the bench

  
AW

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

Service Appeal No 97 /2021

**Zakeria Khan.....Appellant  
VERSUS  
Director General Health Services & others ...Respondents**

**I N D E X**

<b>S NO</b>	<b>DESCRIPTION OF DOCUMENTS</b>	<b>ANNEX</b>	<b>PAGES</b>
1.	Service Appeal	-	1-5
2.	Affidavit	-	6
3.	Application for Suspension	-	7
4.	Affidavit	-	8
5.	Copy of the Advertisement	A	9-12
6.	Copies of the letters dated 23.12.2019	B	13
7.	Copy of the Appointment Order	"C"	14
8.	Copies of the Order and Complaint	"D"	15-16
9.	Copy of the Writ Petition along with decision dated 08.01.2021	"E"	17-23
10.	Copy of letter dated 26.08.2020	"F"	24
11.	Copy of the letter dated 23.04.2021	G	25-26
12.	Copy of the order dated 05.08.2021	H	27
13.	Copy of the Impugned Order dated 06.08.2021 and service Appeal and suspension order	I	28-30
14.	Copies of the illegal and unlawful orders	J	31-33
15.	Copy of Departmental Appeal along with receipts	K	34
16.	Wakalat Nama		

Through: Appellant

**(BASHIR KHAN WAZIR)**  
Advocate,  
High Court, Peshawar

Dated:- 10.11.2021.

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

Service Appeal No \_\_\_\_\_/2021

Zakeria Khan, JCT Pharmacy (BPS-12), North Waziristan.

.....Appellant

**VERSUS**

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar
2. District Health Officer, District North Waziristan.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE  
IMPUGNED ORDER DATED 06.08.2021, VIDE OFFICE ORDER NO  
13024/DHO NWTD WHEREBY THE APPOINTMENT OF THE  
APPELLANT HAS BEEN CONSIDERED CANCEL / WITHDRAWN  
AND CONSEQUENTLY TE SALARIES OF THE APPELLANT HAS  
BEEN STOPPED / WITHHOLD AGAINST WHICH THE  
DEPARTMENTAL APPEAL VIDE DATED 10.08.2021 FILED, BUT  
INSPIE OF TE COMPLETION OF MANDATORY PERIOD OF THE  
DEPARTMENTAL APPEAL, NO ORDER HAS BEEN PASSED.**

**Prayer in Appeal:**

On acceptance of the instant Appeal, the Impugned Orders when initially the salaries of the Appellant was stopped/withheld since 1<sup>st</sup> June 2021 verbally and later on a written impugned Order No. 13024/DHO NWTD dated 06.08.2021 was issued by the Respondent No 2 on the basis of which the Appointment of the Appellant being considered cancelled / withdrawn, the impugned order dated 06.08.2021 and withholding of salaries of the Appellant may kindly be set aside and consequently the Appellant may kindly be reinstated / restored into his service with all back benefits.

**Respectfully Sheweth:-**

The Appellant humbly submits as under:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973..
2. That briefly stated the fact relevant for the purpose of this Appeal are that, the Respondents had advertised number of posts, which were laying vacant in District Health Office, North Waziristan, the Appellant was being qualified and eligible candidate applied for the post as per his qualifications. **(Copy of the Advertisement is attached as annexure A)**
3. That thereafter the Respondent No 2 issued a letter to the Respondent No 1 on the subject that as the Respondent No 2 had already been advertised the vacant posts of the different Paramedics, in response of advertisement, the number of candidates had been applied for that purpose, the Respondent No 1 has been informed that the interviews of the said posts are held on 27<sup>th</sup> and 28<sup>th</sup> December, 2019, where after the

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Respondent No 2 has constituted a committee for Selection / Interview of the Paramedics Staff which was mentioned in the said office letter, while issued on 23.12.2019. **(Copies of the letters dated 23.12.2019 are attached as annexure B)**

4. That after fulfillment of all codal formalities, as the vacant posts were advertised and invited applications from the eligible and suitable Applicants, the Appellant accordingly submitted his Application as well as his academic qualifications and as per the prevailing SOPs of the provincial Government for making inductions in respect of the subject posts, the process for selection was initiated by verification of the degrees of the candidates who applied for these posts. In this respect a property selection Committee was constituted vide order dated 23.12.2019. The Committee so constituted duly interviewed the candidates and after following the process of law/ rules, the successful candidates were issued the Appointment letters. **(Copy of the Appointment Order is attached as annexure C)**
5. That whenever the competent authority as well as the Selection Committee have been appointed the Appellant on his respective posts, after adopting all the codal formalities, meanwhile the political figure as Minister for Relief and Rehabilitation MR. Iqbal Khan Wazir while using his good office forwarded a letter with the subject **"Complaint against illegal appointments made by DHO North Waziristan without fulfilling of codal formalities / bogus diploma holders"**, and directed the District Account Officer District North Waziristan to stop the salaries of 71 Appointees in the DHO North Waziristan Office and it was alleged that their appointments have been made without compliance of codal formalities and the appointees are holding bogus degrees vide letter dated 20.02.2020, the District Account Officer has been requested for the investigation of the matter in question and further the pay and allowances of the Appellant has been requested to be stopped till the finalization of the complaint filed by the Minister Concerned. **(Copies of the Order and Complaint are attached as annexure D)**
6. That inspite of the fact that after issuance of appointment orders, the salaries of the Appellant was started by the Respondent No 2 and on the basis of political interference by the worthy Minister the salaries of the Appellant has been stopped. The Appellant was being aggrieved from the illegal acts of the worthy minister approach to the Hon'ble Peshawar High Court Bannu Bench, while filed a Writ Petition No. 270-B/2020, titled Yasir Iqbal & others VS Govt of KPK & others, the Hon'ble Peshawar High Court Bannu Bench on the first hearing suspended the illegal order of the worthy minister and the District Account officer was directed to continue the salaries of the Appellants till the final disposal of the Writ Petition. **(Copy of the Writ Petition along with decision dated 08.01.2021 is attached as annexure E)**
7. That after the decision of the Hon'ble Peshawar High Court Bannu Bench, the political person as mentioned above Minister for Relief and Rehabilitation again interfered in the same matter, while issued another letter from his letter head to the Minister of Health, whereby he has requested for interference in the official work and the Minister of Health has been compelled to constitute

another inquiry on the subject matter vide letter dated 26.08.2020. **(Copy of letter dated 26.08.2020 is attached as annexure F)**

8. That the concerned Minister belongs to the said areas was wanted illegally interference in the subject recruitment and the then DHO was pressurized for making illegal appointments on his wish and whims, which was straightaway refused by the Ex-DHO, thereafter the concerned Minister threatened the office bearer of Respondent No 2 for being forwarded complaints, therefore the Minister forwarded another complaint when he realize that the initial complaint have served its purpose and nothing was discovered as illegal of the recruitment process. On the basis of second complaint, the office of Respondent No 1 vide letter No 7047-50/E-I dated 06.05.2021 forwarded to the Respondent No 2 with certain recommendations. **(Copy of the letter dated 23.04.2021 is attached as annexure G)**
  
9. That the Respondent No 2 without keeping in view the above mentioned record once again stopped the salaries of the Appellant on the personal grudges with the collusion of Minister concerned, thereafter the Appellant preferred an Appeal to the Respondent No 2 which was forwarded through his endorsement letter dated 05.07.2021 to the Respondent No 1, accordingly the Respondent No 1 accepted the Appeal of the Appellant vide letter dated 05.08.2021 and realized that the case of the Appellant does not fall in the capacity of the letter mentioned above and the Respondent No 2 was directed to implement the judgment of the Hon'ble Peshawar high Court Bannu Bench, vide which the salaries of the Appellant was ordered to be release. **(Copy of the order dated 05.08.2021 is attached as annexure H)**
  
10. That it is pertinent to mention here that as per the above mentioned direction issued by the Respondent No 1, the Respondent No 2 is bound to act accordance with the directions issued by Respondent No 1, however he being annoyed and aggressive on the reason that the then DHO namely Dr. Muhammad Israr approached to the Service Tribunal while filed Service Appeal which was fixed for 05.08.2021 and the Hon'ble Service Tribunal suspended the posting order of the DHO North Waziristan namely Dr Hafeez Ullah, who were even not remained as DHO, but he had been issued the impugned order dated 06.08.2021, inspite of the fact that he was having knowledge about his suspension and he had issued the impugned order which is corum non judice. **(Copy of the Impugned Order dated 06.08.2021 and service Appeal and suspension order are attached as annexure I)**
  
11. That as per the above mentioned record and circumstances the ex-DHO namely Dr Hafeez Ullah was having no authority to issue the impugned Order as he has seized to exists his posting as DHO, but he had issued the impugned order and even then he had illegally, unlawfully and without lawful authority occupied the Chair of DHO and he himself was posing as current DHO North Waziristan and even then he had issued a number of illegal orders and in the light of the impugned Order the salaries of the number of employees have been stopped and they have been considered being removed from service and to some of them

show cause notices as well as they have been warned to  
their duties. **(Copies of the illegal and unlawful orders  
attached as annexure J)**

12. That after the Appellant filed Departmental Appeal, wherein  
the period had been elapsed and no order whatsoever has  
been issued. **(Copy of Departmental Appeal along with  
copies are attached as annexure K)**
13. That in spite of the clear cut direction of the competent authority  
as per Resolution No 1, the Respondent No 2 having personal  
interest and for ulterior motives not following the order of the  
Respondent No 1 and due to which the salaries of the Appellant  
is stopped without any lawful authority.
14. That being aggrieved from the act of Respondents, having no  
other adequate and efficacious remedy, approaches this  
Honorable Tribunal on the following grounds inter-alia:-

**GROUND:-**

- A) That the Appellant is peaceful and law abiding citizen of Islamic  
Republic of Pakistan and is fully entitled to all the basic and  
fundamental rights as enshrined in the fundamental law of the  
state, interpreted and guaranteed by the law of the land.
- B) That the acts of the Respondents of not following the same  
criteria which has been safeguarded by the law and rules and  
guidelines provided by the apex courts that when the employee  
serving on respective posts the competent authority should have  
in retaliation to delivered remuneration to the employee as  
accordance his service, while in the instant case the respondents  
have not yet been considered the case of the Appellants, is  
illegal, unlawful, unnatural, ab-initio, null and void in the eye of  
law, hence liable to be declared so.
- C) That the fundamental rights of the Appellants has blatantly  
violated by the Respondents and the Appellants has been  
discriminated and has been denied his due rights under the  
Constitution of Islamic Republic of Pakistan, 1973.
- D) That the Appellants is appointed according to rules and on  
adopted procedure but the respondents and after his  
appointments he has never ever given an opportunity of any  
complaint to the respondents and performed his duties with full  
devotions, the Appellants being eligible for releasing of  
outstanding salaries which was illegally been retained by the  
respondents is illegal and violation of natural justice, because of  
the fundamental rights/entitlement of the Appellants has been  
denied to them by the Respondents.
- E) That according to the articles 23 & 24 (1) of the constitution of  
Pakistan the property of every citizens of the Pakistan have been  
protected and no one could be deprived from their due rights and  
property, hence the entire due salaries being the fundamental  
right of the Appellants and the respondents is liable to be  
directed for releasing of the entire due salaries of the Appellants.
- F) That once the Appellants was duly appointed/posted and was  
allowed to join the service, after thorough verifications entries  
was also made in his service books, since then he is performing  
his duties, and after having performed his duties, he is certainly  
entitled to be paid his salaries, but all of sudden the respondents



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- have been stopped the salaries of the Appellants, these acts of the respondents are illegal unlawful and liable to be declared so.
- G) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

**PRAYER:-**

It is, therefore, most humbly prayed that, On acceptance of the instant Appeal, the Impugned Orders when initially the salaries of the Appellant was stopped/withheld since 1<sup>st</sup> June 2021 verbally and later on a written impugned Order No. 13024/DHO NWTD dated 06.08.2021 was issued by the Respondent No 2 on the basis of which the Appointment of the Appellant being considered cancelled / withdrawn, the impugned order dated 06.08.2021 and withholding of salaries of the Appellant may kindly be set aside and consequently the Appellant may kindly be reinstated / restored into his service with all back benefits.

Any other relief, not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Appellant  
Through:

**(BASHIR KHAN WAZIR)**  
Advocate,  
High Court, Peshawar

Dated:- 30.11.2021

**CERTIFICATE:**

It is certified that no such like Appeal has earlier been filed before this Hon'ble Tribunal.

**D E P O N E N T**

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

Service Appeal No \_\_\_\_\_/2021

**Zakeria Khan.....Appellant  
VERSUS**

**Director General Health Services & others ...Respondents  
AFFIDAVIT**

I, Zakeria Khan, JCT Pharmacy (BPS-12), North Waziristan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

H  
Munir Khan  
Oath Commissioner  
District No 3370-75  
30-11-2021  
DEPONENT

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

Service Appeal No \_\_\_\_\_/2021

**Zakeria Khan.....Appellant  
VERSUS**

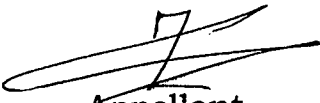
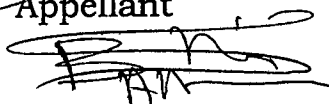
**Director General Health Services & others ...Respondents**

**APPLICATION FOR SUSPENSION OF THE  
IMPUGNED ORDER DATED 06.08.2021, ON THE  
BASIS OF WHICH THE SALARIES OF THE  
APPELLANT WAS STOPPED AND  
CONSEQUENTLY THE CURRENT SALARY OF  
THE APPELLANT MAY KINDLY BE ORDERED TO  
RELEASED, TILL THE FINAL DECISION OF THE  
SERVICE APPEAL.**

**Respectfully Sheweth:**

1. That the above noted Service Appeal is being filed before this hon'ble court, in which no date of hearing has yet been fixed.
2. That the Appellant has got a good prima facie case in their favour, and is sanguine about its success.
3. That the balance of convenience also lies in favour of the Appellant.
4. That if the Impugned Order dated 06.08.2021 is not suspended, the Appellant would suffer extreme irreparable loss.
5. That the facts and grounds of the Appeal may kindly be read as an integral part of this application.

**It is, therefore, respectfully prayed that on acceptance of this application, the relief as prayed for in the heading of the Application may kindly be allowed in favour of the Appellant, till the final decision of the case.**

  
Appellant  
Through:   
**(BASHIR KHAN WAZIR)**  
Advocate,  
High Court, Peshawar

Dated:- 10.11.2021

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

Service Appeal No \_\_\_\_\_/2021

**Zakeria Khan.....Appellant  
VERSUS**

**Director General Health Services & others ...Respondents**

**AFFIDAVIT**

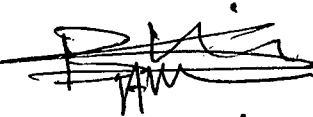
I, Zakeria Khan, JCT Pharmacy (BPS-12), North Waziristan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

H  
Humaira Rehman Advocate  
Oath Commissioner  
Endsc. No. 3370-75  
30-11-2021

  
**DEPONENT**

*Certificate:*

*It is certified that the Appellant has never been fined such like quit before this Honorable Tribunal.*

  
*Deponent*

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پشاور لوٹ آئے اور اسلحا آپا سے جب وقت شام ہوتا۔ تیز رفتاری سے تھیں روزانہ

### پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے

پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے

پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے

پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے

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پشاور پاکستان  
جلد 30، شمارہ نمبر 3، 2019ء، 1441ھ، 20 جولائی 2019ء، شمارہ نمبر 264

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## درخواستیں مطلوب ہیں

قلمی طور پر درخواستیں جمع کروانے کے لیے درخواستیں طلب ہیں۔ درخواستیں طلبہ اور اساتذہ کی شرکت کے لیے درخواستیں جمع کروانے کے لیے طلبہ اور اساتذہ کی شرکت کے لیے درخواستیں جمع کروانے کے لیے

نمبر	تاریخ	موضوع	تفصیلات
1	17-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
2	17-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
3	17-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
4	17-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
5	17-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
6	18-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
7	18-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
8	18-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
9	18-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے
10	18-10-19	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے	پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے

درخواستیں جمع کروانے کے لیے طلبہ اور اساتذہ کی شرکت کے لیے درخواستیں جمع کروانے کے لیے طلبہ اور اساتذہ کی شرکت کے لیے درخواستیں جمع کروانے کے لیے

دستور کت جملتی امور و شئانی وزیرستان ٹریبل دستور کت ڈیوان شاہ

INF(P413819)

پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے

پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے

پشاور میں ہر گھر کے اجباری خلاف ورزی اور اسلحا کو نقصان پہنچانے کے لیے مزید سزوں سے لایا جائے

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پیش کا سہ ماہی چار افراد ہلاک ہوئی  
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 جسے کا سہ ماہی چار افراد ہلاک ہوئی

## درخواستیں مطلوب ہیں

شمالی وزیرستان اور جنوبی وزیرستان میں خالی اسامیوں پر بھرتی کیلئے درخواستیں مطلوب ہیں۔  
 درخواستیں اشتہار پڑائی اشاعت کے چند دنوں کے اندر ہی کرنا ہوں گی۔ تاخیر سے لئے والی درخواستیں منظور نہیں ہوں گی۔

نمبر	ذاتی اسامیوں کی فہرست	تعمیراتی	محلہ	تاریخ
1	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
2	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
3	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
4	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
5	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
6	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
7	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
8	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
9	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018
10	پولیس سپرنٹنڈنٹ	پولیس	پولیس	17-10-2018

شرائط: صرف شہری امیدواروں کو اکثرہ ہوئے کے لئے بلایا جائے گا۔ اکثرہ ہونے کے لئے والوں کو کوئی بھی اسے ڈی اے نہیں دیا جائیگا۔

۳۔ درخواست سادہ کاغذ پر دینا ہوگا۔ ۴۔ درخواست کے ساتھ کیو آر اے ڈی ڈی تو فی شناختی کارڈ اور تجربہ سرٹیفکیٹ اور ڈو برائیٹس کی تصدیق شدہ فوٹو لگانا اور اورجینل کاغذات اکثرہ ہونے کے دن ضروری لانا ہوں گے۔

۵۔ پہلے سے موجود سرکاری اہلکار اپنی درخواستیں جھکاؤ سے ارسال کریں۔ ۶۔ بالائی عمر میں رعایت مردہ قواعد کے مطابق دی جائے گی۔ ۷۔ حجاز اقامت کی کوئی ایک درخواست کو مسترد کرنے اور اسامیوں کی تعداد میں کمی بیشی کا اختیار حاصل ہے۔ ۸۔ تقرری صوبائی حکومت کے موجودہ قواعد و ضوابط کے تحت عمل میں لائی جائے گی۔ ۹۔ تاریخ وزیرستان میں بحال ڈسٹرک سے تعلق رکھنے والے کو ترجیح دی جائے گی۔ بصورت دیگر تقرری اطلاع کے امیدواروں کی درخواستوں پر غور کیا جائے گا۔ ۱۰۔ پہلے سے تاح شدہ درخواستوں والوں کو جاپیہ کہ وہ دوبارہ اپنے درخواستیں جمع کریں۔

## بحکم: حمید اللہ

سب No to Corruption  
 INF(P) 4139/19 also available on [www.khyberpaktunkhwa.gov.pk](http://www.khyberpaktunkhwa.gov.pk)

News Paper Islam

پیش کا سہ ماہی چار افراد ہلاک ہوئی

A

پیش کا سہ ماہی چار افراد ہلاک ہوئی

پیش کا سہ ماہی چار افراد ہلاک ہوئی

### تعمیراتی چترال

### ایوبی

KPP پر کیے گئے سول 2014

S.No	Name of work
1	Rehabilitation of t from Golein Gole
2	Rehabilitation of t from Golein Gole
3	Rehabilitation of t Valley under PDM
4	Rehabilitation of t

(www.ebidding.ph  
 زی تاریخ 22.10.2019 دن  
 لپہہ نیچے ۳۔ ۲ م پولی رہندگان  
 عورتیں سرگھٹ (Active)

### ن چترال

Address: P  
 Also available



Agency: Pakistan  
 No. 1

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**میرٹھان**  
 051-4940311 0300-0665685 0301-6084973  
 Email: info@mirthamail.com

**انٹرنیٹ ایکسچینج کے شمارے**  
 HRM  
 MABAFA

اطلاع عام  
 میرٹھان ایکسچینج کے شمارے  
 میرٹھان ایکسچینج کے شمارے  
 میرٹھان ایکسچینج کے شمارے

میرٹھان ایکسچینج کے شمارے  
 میرٹھان ایکسچینج کے شمارے

تبدیلیاں

20	17	30	20
20	18	20	20
20	19	20	20
20	20	20	20
20	21	20	20
30	22	20	20
20	23	20	20
20	24	30	20
20	25	20	20
20	26	20	20
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20	28	20	20
30	29	20	20
20	30	20	20
	30	20	20
630.00	20	20	20

# درخواستیں مطلوب ہیں

شمالی وزیرستان اور جنوبی وزیرستان میں حالیہ انتخابات کے لیے درخواستیں مطلوب ہیں۔  
 درخواستیں مندرجہ ذیل شرائط کے تحت جمع کروانی چاہئیں:

- 1۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 2۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 3۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 4۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 5۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 6۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 7۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 8۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 9۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔
- 10۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔

**شرائط**  
 1۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔  
 2۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔  
 3۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔  
 4۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔  
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 9۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔  
 10۔ درخواستیوں کو 17-10-2018 تک جمع کرنا ہے۔

**میرٹھان ایکسچینج**  
 ڈسٹرکٹ ہیلتھ آفیسر شمالی وزیرستان اور جنوبی وزیرستان  
 INF(P)4139/19  
 "Say no to Corruption"

1000 SR + food, 1600 SR  
**UNITEB Enterprises**  
 0342-5005678, 0300-5045533, 031-3245151  
 www.bece.gov.pk/foreign-job

3000  
 4000  
 PTN No 363012  
 01-305211  
**SHALWAN & GLOVE**  
 E-Mail: info@khhm.ae  
 +92-51-11-0333-0333333  
 0316-7

X=press news paper  
 Dt. 27/10/2018

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GOVERNMENT OF PUNJAB  
OFFICE OF THE EXECUTIVE ENGINEER  
PUNJAB ROADWAYS DEPARTMENT

### CORRIGENDUM

The advertisement published in various dailies bearing No (NF/P)4014/19 the opening date of works at S.No D (1 to 4) may be read as 21-10-2019. Other terms and conditions will be intact.

**EXECUTIVE ENGINEER**  
SAY NO TO CORRUPTION/DRUGS

### CORRIGENDUM

Refer to this office advertisement published in various newspapers vide (NF/P)4139/19 dated 02-10-2019. The date of interview is published is 17-10-2018 and 18-10-2018 instead of 17-10-2019 and 18-10-2019. All the concerned are requested to note the above corrected date please.

**EXECUTIVE ENGINEER**

Office of the Executive Engineer  
Punjab Roadways Department  
Punjab

SAY NO  
CORRUPT  
DRUGS



5

**OFFICE OF THE DISTRICT HEALTH OFFICER**  
**NORTH-WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH**  
 Email: agency surgeon nwa 2018@gmail.com  
 Tel: (0928) 300788 FAX: (0928) 311662

**OFFICE ORDER:**

The following committee is hereby constituted for selection/interview of the following mentioned paramedic's i.e (LHV BPS-12, X-Ray Technician BPS-12, Sterilization Technician BPS-12, ECG Technicians BPS-12, OT Technicians BPS-12, EPI Technician BPS-12, Drivers BPS-7, JCT (Pharmacy) BPS-12, Storekeeper BPS-12 and Aesthesia Technicians BPS-12) in the best interest of public.

- 01. District Health Officer (Chairman)
- 02. DTO NWT D (Member)
- 03. Representative of Deputy Commissioner NWT D. (Member)
- 04. Representative of Director Health Services Merged Area Peshawar. (Member)

Sdxxxxxxxxxxxx

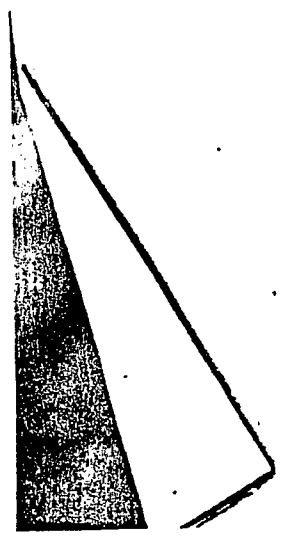
District Health Officer  
 North Waziristan Tribal District

NO. 4678 Interviews dated: the 23 / 12 / 2019.

Copy forwarded to all of the above mentioned members for information and necessary action please.

*[Signature]*  
 District Health Officer  
 North Waziristan Tribal District

*[Signature]*  
 District Health Officer  
 NWT D Miranshah



(18)  
C

**OFFICE OF THE DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH**

tel: (0926) 203788 FAX: (0926) 311662 Email: dhagency.nwt@gmail.com

**OFFICE ORDER:**

On the recommendation of Departmental Selection committee, Mr. Zakerin Khan S/O Muhammad Sher Faraz Khan resident of village Hassulhel Tehsil and P/O Mirali is hereby appointed as a X-Ray Technician in BPS-12 (13320-960-42124) plus usual allowances as admissible under the rules against the newly created vacant post at Type-C Hospital Mirali in the best interest of public services with immediate effect.

His appointment shall be on the following terms and conditions:

- 1- He is declared medically fit for this job.
- 2- His appointment shall be for a permanent basis from the date of his joining in service.
- 3- He shall be bound to serve for at least 3 years in North Waziristan.
- 4- He shall not indulge in any trade, business and any other activity what so ever which has been declared prohibited for the Government Servants in Civil Servant Act, 1973.
- 5- If he wishes to resign the services a prior notice of 30 days will be submitted, otherwise one month pay should be deposited in Government treasury through challan.
- 6- He will have to serve anywhere in North Waziristan Tribal District.
- 7- His Salaries should be released after the verification of all the documents by the concerned Board/Faculty etc.
- 8- He will not be entitled for any TA/DA for joining the service.
- 9- If he accepts the above terms and conditions, he has to report for duty to the SMO incharge Type-C Hospital Mirali within 15 days of the receipt of this order, otherwise the order will be considered as cancelled.

Sd/-  
Dr. Hamidullah  
District Health Officer  
North Waziristan Tribal District

No. 0926/2011-36 (App'ts) dated 31/12/2011

Copy for to the:

- 1. District Health Officer, North Waziristan Tribal District
- 2. District Health Officer, Miran Shah
- 3. District Health Officer, Miran Shah
- 4. District Health Officer, Miran Shah
- 5. District Health Officer, Miran Shah
- 6. District Health Officer, Miran Shah
- 7. District Health Officer, Miran Shah
- 8. District Health Officer, Miran Shah
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- 15. District Health Officer, Miran Shah
- 16. District Health Officer, Miran Shah
- 17. District Health Officer, Miran Shah
- 18. District Health Officer, Miran Shah
- 19. District Health Officer, Miran Shah
- 20. District Health Officer, Miran Shah



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**MUHAMMAD IQBAL KHAN WAZIR  
(DDAC) CHAIRMAN/MEMBER  
PROVINCIAL ASSEMBLY PK-111**

No. DDAC/MPA-PK-111/2020/Health  
Dated: The Peshawar February 17, 2020

Subject:

**COMPLAINT AGAINST ILLEGAL APPOINTMENTS MADE  
BY DHO NORTH WAZIRISTAN WITHOUT FULFILLING  
FORMALITIES/BOGUS DIPLOMA HOLDER.**

My Dear,

Hope this letter of mind find you in the best if your health.

I would like to say that District Health Officer North Waziristan recently made almost 71 appointments of bogus degree holders on taking bribe and without fulfilling of codal formalities.

In view of the above the salaries of 71 appointees (list attached) may be stopped till the inquiry report is not furnished.

Muhammad Iqbal Wazir

District Accounts Officer,  
District North Waziristan  
NWTD Miranshah

CC:-

1. Deputy Commissioner, North Waziristan with the request to look into the matter personally.
2. DHO North Waziristan.

*[Handwritten signature]*

District Health Officer  
Miranshah Triba Distt:



**OFFICE OF THE DISTRICT ACCOUNTS OFFICER  
NORTH WAZIRISTAN (TRIBAL DISTRICT) MIRAN SHAH.**  
No. DDAC/SRS/11/1/2020/2020

*(Handwritten marks)*  
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To:

The District Health Officer  
NWTD Miran Shah

**SUBJECT:- COMPLAINT AGAINST ILLEGAL APPOINTMENT MADE BY  
DHO NORTH WAZIRISTAN WITHOUT FULFILLING CODAL  
FORMALITIES/BOGUS DIPLOMA HOLDER.**

Memo.

Please refer to the letter issued by Mr. Muhammad Iqbal Khan,  
Wazir, Minister for Relief (DDAC) chairman, Member Provincial Assembly PK 111  
vide No. DDAC /MPA-PK 111/2020/Health/dated 17/02/2020 on the subject cited  
above.

In this connection it is requested that the matter may be  
investigated at your end and computer change proforma may send to this office for  
stoppage of pay & Allowance of the employees as per list attached till the complaint  
to be set a side.

2. It is also pertinent to mention that as per the verbal directions of  
the worthy Minister that before processing fresh appointment/recruitment of any  
kind and of any department prior permission may be obtained from the Minister  
concerned.

*(Signature)*  
District Accounts Officer  
NW (Tribal District) Miran Shah

Copy forwarded to:

1. The Accounts officer (C&M) O/O the Accountant General Khyber  
Pakhtunkhwa Peshawar with the request to guide this office for  
appropriate action in the subject case please.
2. The Deputy Commissioner NWTD Miran Shah for information and  
necessary action please.

*(Handwritten initials)*

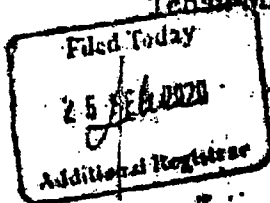
*(Signature)*  
District Accounts Officer

1  
**BEFORE THE PESHAWAR HIGH COURT**  
**BANNU**



Writ Petition No. 270-B of 2020

1. Yasir Iqbal S/o Habib Nawaz R/o Village Hurmaz, Tehsil Mir Ali, District North Waziristan.
2. Ali Johar Iqbal S/o Muhammad Iqbal R/o Village Hurmaz, Tehsil Mir Ali, District North Waziristan.
3. Zubair Ali S/o Hazrat Ali R/o Village Hurmaz, Tehsil Mir Ali, District North Waziristan.
4. Miss. Sania Bibi D/o Arsala Jan R/o Village Hurmaz, Tehsil Mir Ali, District North Waziristan.
5. Nasir Ahmad Khan S/o Zafar Ali R/o Village Hassu Khel, Tehsil Mir Ali, District North Waziristan.
6. Asif Ali S/o Noor Ali Jan R/o Village Karamkot, Tehsil Miran Shah, District North Waziristan.
7. Miss. Nothia Bibi D/o Ameer Ullah R/o Village Ghazlamai, Tehsil Datta Khel, P.O. Boya, District North Waziristan.
8. Fida Hussain S/o Mir Ghulam R/o Village Hassu Khel, Tehsil Mir Ali, District North Waziristan.
9. Muhammad Imran S/o Atta-Ullah Jan R/o Village Hassu Khel, Tehsil Mir Ali, District North Waziristan.
10. Wasiq Ullah S/o Muhammad Abdul Hai R/o Village Hassu Khel, Tehsil Mir Ali, District North Waziristan.
11. Miss. Bas Nizza D/o Muhammad Noshar Khan R/o Village Mussaki, Tehsil Mir Ali, District North Waziristan.
12. Hussain Ahmad S/o Haider Ali R/o Village Hurmaz, Tehsil Mir Ali, District North Waziristan.



**ATTESTED**

EX. No. 11. K  
Peshawar High Court  
Bannu Bench

Scanned by TapScanner

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19

13. Muhammad Israr S/o Saadullah Jan R/o Village Hamzoni Patti Khel, Tehsil Miran Shah, District North Waziristan.
14. Nizam Ullah S/o Syed Khan Majan R/o Village Danday, Soudgi, Zakir Khel, Tehsil Ghulam Khan, District North Waziristan.
15. Tahir Iqbal S/o Malik Zaman R/o Village Musrak, Tehsil Mir Ali, District North Waziristan.
16. Asad Aziz S/o Muhammad Farooq R/o Village Tappi, Tehsil Miran Shah, District North Waziristan.
17. Muhammad Abdillah S/o Muhammad Shahid R/o Village Hassu Khel, Tehsil Mir Ali, District North Waziristan.
18. Muhammad Zaman S/o Abdul Sattar R/o Village Issori, Tehsil Mir Ali, District North Waziristan.
19. Miss. Hajra Naz D/o Latif Ullah R/o Village Hassu Khel, Tehsil Mir Ali, District North Waziristan.
20. Akmal Khan S/o Abdullah Qayyum R/o Village Darpa Khel, Tehsil Miran Shah, District North Waziristan.
21. Shoukat Ullah S/o Yaqoob Khan R/o Village Zirraki, Tehsil Mir Ali, District North Waziristan.
22. Wali Rehman S/o Pir Rehman R/o Village Khushali, Tehsil Mir Ali, District North Waziristan.
23. Azmat Ullah S/o Raees Khan R/o Village Khushali Malki Khel, Tehsil Mir Ali, District North Waziristan.
24. Muneeb Rehman S/o Zari Jan R/o Village Hassu Khel, Tehsil Mir Ali, District North Waziristan.
25. Wali Ullah S/o Muhammad Rafiq R/o Village Hamzoni All Khej, Tehsil Miran Shah, District North Waziristan.
26. Nasir Azam S/o Noor Azam Jan R/o Village Danday Hora Khel, Tehsil Miran Shah, District North Waziristan.

File No. 25  
25 FEB 2024  
[Signature]

ATTACHED  
[Signature]  
District Magistrate

19

- 27. Miss. Rizwana Sadiq D/o Muhammad Sadiq R/o Village Dawar Tappi, Tehsil Miran Shah, District North Waziristan.
- 28. Muhammad Amir Shah S/o Muhammad Karim Shah R/o Village Edak Khadi, Tehsil Mir Ali, District North Waziristan.
- 29. Ameer Mahmood S/o Hayat Khan R/o Village Dawir Banda, Tehsil Miran Shah, District North Waziristan.

.....PETITIONERS

**VERSUS**

Govt. of Khyber Pakhtunkhwa through Director Health Services, Mardan Area, Peshawar.  
 District Health Officer, District North Waziristan.  
 District Accounts Officer, District North Waziristan.  
 Muhammad Ishaq Khan Wazir, DDAC Chairman/  
 Member Provincial Assembly PK-111.

.....RESPONDENTS

**WRIT PETITION UNDER ARTICLE 192**

**OF THE CONSTITUTION OF ISLAMIC**

**REPUBLIC OF PAKISTAN, 1973 AD**

**ARTICLE 192**

**TESTED**

23/11/2019  
 11:30 AM  
 District Court  
 Mardan

TESTED  
 23/11/2019  
 11:30 AM  
 District Court  
 Mardan

20  
②

**IN THE PESHAWAR HIGH COURT,**  
**BANNU BENCH.**  
*(Judicial Department)*

**Writ Petition No.270-B of 2020**  
**Yasir Iqbal etc Vs. Govt. of Khyber Pakhtunkhwa etc**

**Date of hearing 18.01.2021**

**Petitioners by: M/S Jehanzeb Mehsud and Bashir Khan  
Wazir Advocates**

**Respondents by: Mr. Shahid Hameed Qureshi, AAG, with  
Mr. Siddique Anjum, A.D. (Lega) Anti-  
Corruption Establishment and Mr.  
Fahim, Admin Officer Rescue 1122**

**JUDGMENT**

\*\*\*\*\*

**SAHIBZADA ASADULLAH, J.**—Through the instant petitioner filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioners are seeking the following relief:

*It is, therefore, humbly prayed that, on acceptance of this writ petition an appropriate writ may please be issued declaring that petitioners have been validly appointed on their respective vacant posts, after adopting all codal formalities and the petitioners are still working*



against the said posts with no complaint whatsoever, the impugned letter dated 20.02.2020 issued by the respondents No.3 & 4 may please be declared as illegal, unlawful, without lawful authority and of no effect, the same is liable to be struck down, the petitioners are also entitled to be continued their duties and accordingly respondents No.1 to 3 may be directed not to withhold/stop monthly pay and allowance of the petitioners and if they have been stopped/withhold the salary of the petitioners, the same may be ordered to be released with mutatis mutandi.

Any other relief, not specifically asked for may also graciously be extended in favour of the petitioner in the circumstances of the case.

2. Facts of the case, essential for the decision of this writ petition, are that the petitioners were appointed on various cadres of paramedics by the District Health Officer North Waziristan. However, respondent No.4 made a complaint wherein the appointment of petitioners was alleged to be illegal, without fulfilling codal formalities and based on bogus diplomas. On the basis of said complainant department started

an inquiry and thereby, the salaries of petitioners were ordered to be stopped till the outcome of inquiry as to the legality of their appointments. Hence, petitioners approached this Court with the above-mentioned relief.

3. On 26.02.2020, this court directed respondents No.3 & 4 to file para-wise comments to the writ petition which have been so furnished by respondent No.3, wherein, issuance of the desired writ is opposed.

4. We have heard arguments of the learned counsel for the parties as well as learned AAG, and have gone through the record.

5. A threadbare perusal of the record reveals that the prayer of petitioners to declare that they have been validly appointed on their respective posts, after adopting all codal formalities directly relates to the provision of Rule 10 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. The jurisdiction of this Court, concerning all the matters which touch the terms & conditions of the service of a Civil Servant, is barred under Article 212 of the Constitution of Islamic Republic of Pakistan. Besides, as the inquiry as to the legality and otherwise of the appointment of petitioners is pending, therefore, any order passed in this behalf shall directly affect the merits of inquiry. Therefore, this Court

22  
(22)

while exercising its constitutional jurisdiction cannot indulge into the matter of inquiry and legality of the appointments of petitioners.

6. As far as the stoppage of salaries is concerned, Article 11 of the Constitution of Islamic Republic of Pakistan, 1973, in unequivocal words prohibits the forced labour. Moreover, no circumstance as envisaged in Article 11(4) of the Constitution is available in this case which may justify the stoppage of salaries of petitioners despite performance of their duties. Therefore, if petitioners are performing their duties and they are still in service, then respondents No.1 to 3 are bound to pay them for the labour and services which petitioners rendered in the department.

7. In view of the foregoing discussion, the writ petition is disposed-off in the above terms.

Announced.  
18.01.2021

*AS*  
*Khan*

SCANNED  
01 FEB 2021  
*Khalid Khan*  
Khalid Khan

*M. I.*  
*M. I.*  
JUDGE  
*Qureshi*  
JUDGE

*(D.B) Ms. Justice Musarrat Hameed and Mr. Justice Sahibzada Asadullah*  
*\*M/Subhan*

24  
②  
'F'  
②

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DO NOT WRITE IN THESE SPACES  
DATE: 26/05/2000

HAD JOBAL WAZIR

Subject: **REQUEST FOR INQUIRY**

My Dear,

Hope this letter of mine will find you in the best of your health.

I would like to enclose herewith a letter addressed to your good self with regard to conduct inquiry against DHO North for 71 illegal appointments in Tribal District North Waziristan (appointees list attached). It is also mention here that Mr. Amjid Salim Junior Clerk is also involved in all these illegal activities and in taking bribe from these appointees.

It is also pointed out that the present DHO North Waziristan again made illegal appointments in Tribal District North Waziristan (copies attached).

In view of the above, it is requested to kindly direct the quarter concerned to conduct inquiry against DHO North Waziristan on top priority basis, please.

Yours Sincerely,

SOV  
26/5

AS (Both)

Handwritten notes and signatures including 'eng', 'within week', and '26/5/2000'.

Mr. Taimoor Saleem Khan Jhagra,  
Minister for Health, Khyber Pakhtunkhwa.

Copy forwarded for similar action to:-

1. The Secretary Health, Govt. of Khyber Pakhtunkhwa.
2. The Director General Health, Khyber Pakhtunkhwa.
3. The Director Merged Area Health, Khyber Pakhtunkhwa.
4. The Director Anti-corruption, Khyber Pakhtunkhwa.

Handwritten signature

ADDRESS 2ND FLOOR MINISTERS BLOCK CIVIL SECRETARIAT PESHAWAR  
KHYBER PAKHTUNKHWA PH-091921000





GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

NO. SOH(E-V)4-4/2021 Inquiry Report  
Dated Peshawar the April 22<sup>nd</sup>, 2021

The Director General Health Services,  
Khyber Pakhtunkhwa,  
Peshawar

4136  
277414

Subject: REQUEST FOR INQUIRY AGAINST DHO NORTH WAZIRISTAN

Dear Sir,

I am directed to refer to the subject noted above and state that the Establishment & Admin Department (Regulation Wing) has submitted Inquiry Report of Khyber Pakhtunkhwa Provincial Inspection Team regarding illegal appointment/regularization made by Dr. Hameedullah, Ex-DHO North Waziristan. The following recommendations may be implemented:-

1. Cancel/ withdraw all the irregular adjustments/ regularizations and appointment of the employees during the tenure of Dr. Hameedullah and Dr. Israr ul Haq, Ex-DHO, North Waziristan as indicated in the inquiry report.
2. The credentials/ antecedents of all the employees working under the administrative control of DHO, North Waziristan may be verified from the concerned Boards/ Universities/ Faculties under the prevailing rules.
3. The clerical staff working in the office of DHO, North Waziristan were found involved in concealment of the office record for their vested interest, therefore, they may be transferred out of District of North Waziristan and must never be posted in North Waziristan in future.

I am, further directed to state that the above mentioned recommendations may be implemented under intimation to this Department, please.

Yours faithfully,

(Latif Ur Rehman)  
SECTION OFFICER (E-V)

E. I  
of

IMPORTANT/URGENT

OFFICE OF THE DIRECTORATE GENERAL HEALTH KPK PESHAWAR

Dated: 26/05/2021

No. 7047-50/E.I

Copy of the above is forwarded to the:-

1. Deputy Director Paramedics DGHS Office Khyber Pakhtunkhwa, Peshawar.
2. AD/In-charge (Personnel Section) DGHS KP, Office.
3. The District Health officer North Waziristan Merged District at Miranshah.

For information and immediate necessary action.

ADDL. DIRECTOR GENERAL (HRM) HEALTH  
KHYBER PAKHTUNKHWA DEPARTMENT

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**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR.**

Office Ph# 091 - 9210269 Exchange# 091 - 9210187, 091 - 9210196, Fax #091 - 9210230  
All communications should be addressed to the Director General Health Services Peshawar and not to  
any official by name.

No 11804 /EV

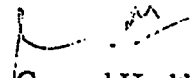
Dated 5/8/2021

To

District Health Officer  
North Waziristan (Dist: Miranshah)

Subject: REQUEST FOR IMPLEMENTATION OF THE HONORABLE PESHAWAR HIGH  
COURT BANNU BENCH DECISION UNDER WP NO.270- OF 2020 DATED  
18.01.2021 YASIR IQBAL ETC VS GOVT OF KHYBER PAKHTUNKHWA ETC.

Kindly reference to your letter No.11134-35 /Court Case dated 05.07.2021  
on the subject noted above and to direct to implement the decision of the Honorable  
Court, under intimation to this Directorate.

  
Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

28

ANZ-9 I

(30)

**OFFICE OF THE DISTRICT HEALTH OFFICER  
TRIBAL DISTRICT AT MIRANSHAH**

Tel: (0928) 300788 FAX: (0928) 311662  
No. 13024 /DHO NWTD

Email: agency Surgeon nwa2018@gmail.com

Dated

06 / 08 / 2021

**The Director General Health Services  
KP, Peshawar**

**Subject:**  
R/Sir,

**REQUEST FOR INQUIRY AGAINST DHO NORTH WAZIRISTAN.**

In compliance to your office endorsement No.7047-50/E.I dated 06/05/2021 in response to Secretary Health Office Letter No. SOH (E-V) 4/20201/Inquiry Report dated Peshawar the April 22<sup>nd</sup>, 2021, the undersigned is pleased to cancel/withdraw all the irregular adjustment/regularization and appointment of the employees during the tenure of Dr.Hamid Ullah and Dr.Israr Ul Haq EX-DHO North Waziristan as indicated in the inquiry report with immediate effect.

*[Signature]*  
District Health Officer  
Tribal District Miranshah  
Dated the: 06/08/2021

No. \_\_\_\_\_ /DHO NWTD

**Copy forwarded to the:**

1. Deputy Commissioner Tribal District Miranshah.
2. PA to Secretary Health KP, Peshawar.
3. HQ-7 Dive Camp Area Miranshah.
4. All Officials Concerned.

*This inquiry was conducted against 71 employees.*

**District Health Officer  
Tribal District Miranshah**



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27

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 7/29 /2021



Dr. Muhammad Israr-UI-Haq, Management Cadre (BPS-18)  
Posted as District Health Officer, District North Waziristan. **APPELLANT**

**VERSUS**

- 1- The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
  - 2- The Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
  - 3- The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
  - 4- Dr. Hafizullah, General Cadre (BPS-17), under transfer/ posted as District Health Officer, North Waziristan (OPS), District North Waziristan.
- ..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 09-07-2021 WHEREBY THE PRIVATE RESPONDENT NO.4 HAS BEEN POSTED AGAINST THE POST OCCUPIED BY THE APPELLANT IN UTTER VIOLATION OF TRANSFER/POSTING POLICY AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD.**

**PRAYER:**

*filed to-day  
at  
Registrar  
02/08/2021*

That on acceptance of this appeal the impugned Notification dated 09-07-2021 may very kindly be set aside to the extent of posting of the private respondent No.4 against the post occupied by the appellant and the respondents may kindly be directed not transfer the appellant from the post of District Health Officer, District North Waziristan. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:  
ON FACTS:**

**Brief facts giving rise to the present appeal are as under:-**

*Certified to be true copy*  
**REGISTRAR**  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar





05.08.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contends that the transfer of the appellant through impugned order is against the posting/transfer policy of the Provincial Government. Let the respondents be put on notice for regular hearing. The appeal is admitted for regular hearing subject to all legal objections to be determined during full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 22.09.2021 before the D.B.

An application has been filed alongwith the appeal for interim relief. Notice of the application be also given to the respondents. The operation of the impugned order shall remain suspended to the extent of appellant and respondent No. 4 till next date.

Date of Preparation of Sanction 05/08/21  
 Number of Sanction 8032  
 Copy to 16/  
 Urgent 10/  
 Total 16/  
 Name of 06/08/21  
 Page of 05/08/21  
 Date of Delivery of 05/08/21

Chairman

Certified to be true copy  
KINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar



OFFICE OF THE DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN

Tel: (0928) 300788 FAX: (0928) 311662 Email: agency surgeonwa19@gmail.com

No. 13354 /DHO Office

Dated 25/8/2021

ANR J 31

To

1. Dr. Muhammad Adnan Khan MO Type-D Hospital Razmak
2. Dr. Jamshid Nawaz MO -do--
3. Dr. Abid Ullah MO -do--
4. Mr. Wali Ullah OTA -do--
5. Mr. M. Habib Shah EPI Technician -do--
6. Mr. Atta Ur Rehman Dental Technician -do--
7. Mst. Sania Bibi LHV -do--
8. Mr. Zohair Storekeeper -do--

Subject:

SHOW CAUSE NOTICE.

Memor:

Whereas you all have been reported as willfully absent from your duty station from unknown duration.

Whereas you all have been reported absent without any prior permission of the undersigned.

Whereas it shows that you are not performing duties regularly which is equivalent to negligence on your part.

In view of the above, you all are directed to report to your duty stations with immediate effect.

Consequent upon the above, you all are hereby directed to show cause of absenteeism in written and reach this office within 02 days positively. In case you failed to report to your duty station and failed to justify your position, strict disciplinary action will be initiated against you which may lead to removal/termination from service.

  
DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN AT MIRANSHAH

No. / Show Cause Notice

Copy forwarded to the:

08/2021

- 1- Director General Health Services KP Peshawar.
- 2- Deputy Commissioner Tribal District Miranshah.
- 3- Assistant Commissioner Sub Division Razmak.
- 4- PS to Secretary Health, KPK, Peshawar.
- 5- HRMS Focal Person of this office.
- 6- DMO, IMU Health Department.
- 7- Head Clerk of this office with direction to stop their salaries till further orders.
- 8- Official concerned.

DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN AT MIRANSHAH

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④

**OFFICE OF THE DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN AT MIRANSHAH**

/DHO/POLIO/MRN

Dated the: \_\_\_\_\_/10/2021

1. Mr. Nizam ud Din, EPI Technician
2. Mr. Nasir, EPI Technician
3. Mr. Mohsin Kamal, EPI Technician
4. Mr. Ashraf Ali, EPI Technician
5. Mr. Muhammad Hakim Shah, EPI Technician
6. Mr. Sher Alam Khan, EPI Technician
7. Mr. Shereen Gul, EPI Technician (OSS Centre)
8. Mr. Burhan Ullah, EPI Technician (OSS Centre)
9. Mr. Nasir Ud Din, EPI Technician
10. Mr. Ghafoor Hassan, EPI Technician
11. Mr. Adil Khan, EPI Technician
12. Mr. Abrar Ahmad, EPI Technician
13. Mr. Mehtab Qureshi, EPI Technician
14. Mr. Imran (PSDP), EPI Technician
15. Mr. Saleem ullah, EPI Technician
16. Mr. Abdur Rehman, EPI Technician
17. Mr. Muhammad Baseer, EPI Technician
18. Mr. Shaheen ullah, EPI Technician
19. Mr. Din Muhammad, EPI Technician

Subject: Long Absence From duty & Non-submission of Monthly Data

As reported categorically by FSMO/EPI Coordinator, North Waziristan that you are absent from your assigned duties since long and that you are not administering routine immunization Vaccines/Antigens in your assigned areas of responsibility which poses a threat to the Health status of the children of the whole community of this district.

In this connection, you all are hereby directed to report to your assigned duty stations/areas of responsibility with immediate effect, failing which strict disciplinary action will be initiated against you under E & D rules which may lead to removal/termination from service.

**DISTRICT HEALTH OFFICER**  
North Waziristan at Miranshah

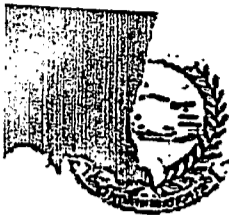
Dated the: 11/10/2021

No. 15457-56/DHO/POLIO/MRN/

Copy forwarded to the:

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner, North Waziristan, Miranshah.
3. Additional deputy commissioner, North Waziristan, Miranshah.
4. N-STOP Officer, DPCR, North Waziristan, Miranshah.
5. Head Clerk with directions to deduct 20 days salary of the above mentioned officials with immediate effect.
6. Officials Concerned.

33/10



**OFFICE OF THE DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN**

Tel: (0922) 300788 FAX: (022) 311662 Email: gdnrcysagovnorthernwaziristan@gmail.com

No 14344

Date: 9/10/2021

**OFFICE ORDER:**

The following EPI Technicians are hereby directed to cover the zero dose children as mentioned against their names on next footing in the best public interest.

SNof	UC	Name	Recorded Zero Dose	Covered Zero Doses	Percentage%
1.	Mirali 3	(1)SheirAlBaz(2)Zain Ullah (3)Asad Ullah(4)M.Raza	25	8	32%
2.	Mirali 5	(1)Abid Iqbal (2)Fahad Ullah(3)Shams Ur Rehman	93	6	6.45%
3.	Shawa 1	(1)Nizam ud din(2)Nasir	46	0	0%
4.	Shawa 2	(1)Mohsin Kamal(2)Ihsan ulah wazir	43	0	0%
5.	Spinwar 1	(1)Ghufur Ullah Humaz(2)Zahir Ayub Musaki(3)Ashraf Ali	59	37	62.71%
6.	Spinwar 2	(1)Qismat ulah(2)M.Hakeem Shah	116	15	12.9%
7.	Datta kbel 1	(1)IbrahAhmad(2)Mehrab Qureshi(3)Ibrah Ahmad(4)Izzat	58	15	25.86%
8.	Datta kbel 2	(1)Saleem Ullah(2)Abdur Rehman(3)Ijazab Khan(4)Acif Ullah(5)Mohammed Raseer	82	8	9.7%
9.	Datta kbel 3	(1)Shams UR Rehman	2	0	0%
10.	Datta kbel 6	(1)Arshad Ullah	3	0	0%
11.	Gulistan Khan	(1)Izzat Ullah(2)Alimad ulah(3)Fahim Ullah(4)Hansa Ullah(5)Arfan Ullah	20	9	45%
12.	Garyum	Jahangir Dispenser	16	0	0%

Coverage report by names to be submitted to FSMO/EPI Coordinator within three days positively.

*(Signature)*  
District Health Officer  
North Waziristan  
Dated 9/10/2021

No 14345-49

- Copy to: Copy forwarded to the:
1. Director EPI Khyber Pakhtun Khwa
  2. Deputy Commissioner North Waziristan.
  3. FSMO/EPI Coordinator North Waziristan.
  4. DPCK North Waziristan.

*(Signature)*  
District Health Officer  
North Waziristan  
Forwarded and Certified

34  
K (18)

To

Director General Health Services Khyber Pakhtunkhwa Peshawar

Subject: DEPARTMENTAL APPEAL UNDER SECTION 22 OF THE CIVIL SERVANTS ACT AGAINST THE LETTER OF DISTRICT HEALTH OFFICER NORTH WAZIRISTAN TRIBAL DISTRICT TO DIRECTOR GENERAL HEALTH SERVICES DATED 06/08/2021 ON THE BASIS OF WHICH THE SALARIES OF THE APPELLANT HAS BEEN STOPPED/WITHHELD ILLEGALLY SINCE 1<sup>ST</sup> JUNE 2021.

RESPECTED SIR,

The Appellant submit as under:-

With due respect it is stated that, I am performing my duties as Rtg. BPS-12 under the district health officer (DHO) District North Waziristan I was appointed after fulfillment of all coddle formalities, since my appointment performing my duties with full devotion and great zeal and zest.

That I and along with other employees have been appointed in the light of proper advertisement and after assumption of charge on the subject posts my along with other employees salaries were stopped by the District Account Officer North Waziristan, due to the active involvement of Minister for relief Mr. Muhammad Iqbal Wazir, who belongs to the same area, thereafter, we approached to the Peshawar High Court Bannu Bench in writ Petition and challenged the illegal acts of the concerned, which was accepted and the concerned quarters have been directed to release salaries of the appellant along with other colleagues.

Now once again on the request and active connivance of the Minister Mr. Muhammad Iqbal Wazir constitute an enquiry without associated to the appellant the office order issued by the secretary Health mentioned in the heading of appeal has been endorsed by the DG health and on the basis of which the salaries of the appellant along with other more than 400 employees have been stopped since 1<sup>st</sup> June 2021 illegally without any justifications, just to cover up the request and illegal letter issued by the Minister concerned, therefore, the appellant aggrieved from the illegal stoppage of salaries and letter of the secretary and DG Health and the Same has been done on the directions of political figures, therefore, the impugned order dated 22/04/2021 endorsed by the DG health on the dated 06/05/2021 and the same order implemented by DHO North Waziristan dated 06/08/2021, on the basis of which the salary of the appellant has been stopped by the DHO North Waziristan since 1<sup>st</sup> June 2021 being illegal, unlawful, without lawful authority and liable to be set aside.

It is, therefore, most humbly prayed that on the acceptance of this appeal basic office order dated 22/04/2021 and consequently the order dated 06/05/2021 and letter to DG health by DHO North Waziristan dated 06/08/2021 and stoppage of salaries since 1<sup>st</sup> June 2021 may very kindly be cancelled and the current as well as outstanding salaries of the appellant may kindly be released.

I shall be very thankful to you.

Dated:- 10/8/2021

Appellant

Name: Zakeria Khan

Father Name: \_\_\_\_\_

Designation along with post: Radiographer Tech.

Contact: 0332-5016002

بعدالت سروس ریکروٹمنٹ 19

BC # 0920-53  
0333-9732415

ذکرہ بالا خان بنام حکومت  
2021ء منجانب

موزخہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
آن مقام کے واسطے کیلئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلقہ دینے جواب دہی اور اقبال دعویٰ اور  
بسورت ڈگری کرنے اجراء اور صولی چیک رو پیہار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
ڈرائس پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لانا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائد التوائے مقدمہ کے سبب سے وہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا ادکالت نامہ لکھدیا کہ سند ہے۔

المرقوم 10 ماہ 11 2021ء

بمقام 19  
کے لئے منظور ہے۔  
Accepted  
Bun  
Am