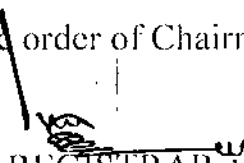


FORM OF ORDER SHEET

Court of _____

Case No.- 2014/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/12/2022	<p>The appeal of Dr. Ali Muhammad presented today by Mr. Muhammad Arif Jan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p>Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 2014 /2022

Dr. Ali Muhammad Appellant

VERSUS

Medical Superintend DHQ Hospital, Charsadda & others.

..... Respondents

INDEX

S.No	Description of Documents	Annex	Pages
1.	Grounds of Appeal with affidavit		1-5
2.	Application		6
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4.	Addresses of parties		8
5.	Copies of NOC, letter/order dated 06-01-2022 and arrival report	A	9-11
6.	Copies of promotion and transfer order	B & C	12-13
7.	Copies of leave sanction and order/letter dated 27-05-2022, monthly salary statement and seniority list	D & E	14-25
8.	Copy of grievance letter	F	26
9.	Copies of explanation letter and reply	G & H	27-28
10.	Copy of legal notice	I	29-30
11.	Copies of letter dated 25-10-2022 and inactiveness of monthly salary	J & K	31-33
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APPELLANT

Through


Muhammad Arif Jan

Advocate Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 2014 /2022

Dr. Ali Muhammad Senior District Surgeon (BPS-19) DHQ Hospital,
Charsadda. Appellant

VERSUS

1. Medical Superintendent DHQ Hospital, Charsadda.
2. Govt. of Khyber Pakhtunkhwa through Chief Secretary civil Secretariat, Peshawar.
3. Secretary Health, Government of Khyber Pakhtunkhwa, Peshawar.
4. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
5. District Accounts Officer, Charsadda.

..... Respondents

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ILLEGAL AND UNLAWFUL ACTS, COMMISSIONS AND OMISSIONS OF RESPONDENT NO-1 AGAINST WHICH DEPARTMENTAL APPEAL HAS BEEN PERFERRED ON 17-08-2022 BUT THE SAME HAS NOT BEEN DISPOSED OF/DECIDED WITHIN THE PRESCRIBED STATUTORY PERIOD.

Respectfully Sheweth:

1. That initially the appellant was appointed as District Surgical Specialist in Health Department KP through public service commission and then was promoted to Senior District Surgical Specialist (BPS-19) in the year, 2018.
2. That against the vacant post, respondent No-1 issued "No Objection Certificate" to the appellant and thus the competent authority transferred/posted the appellant against the post of Chief District Surgical Specialist BPS-20 in his own pay and scale vide letter dated 06-01-2022 and then the appellant submitted his arrival report. (Copies of NOC, letter/order

dated 06-01-2022 and arrival report are attached as ANNEX-A).

3. That after arrival of the appellant, one another Surgeon District Specialist Dr. Muhammad Bilal BPS-18 who was later on promoted to Senior District Specialist BPS-19 and meanwhile, respondent No-1 conducted an inquiry against the said Doctor and resultantly he was transferred on 09-03-2022. (Copies of promotion and transfer orders are attached as ANNEX-B & C respectively).
4. That instead of compliance transfer order, Dr. Muhammad Bilal with the active conveyiece patched up (rumors regarding patch up are in the market) the matter with respondent No-1 and was accorded 90 days earned leave vice order dated 29-03-2022 but surprisingly respondent No-1 again adjusted/posted as Head of the Department despite the fact of the said Doctor is most Junior then appellant and the appellant was directed to perform his duties as Principal Medical Officer vied letter/order dated 27-05-2022 and consequently the same wrong entry of designation has been entered in some other record of the appellant including the last monthly salary statement. It is-worth mentioned here that respondent No-1 has no power/authority to change the designation. (Copies of leave sanction and order/letter dated 27-05-2022, monthly salary statement and seniority list are attached as ANNEX-D & E respectively).
5. That the appellant also submitted a grievance letter (Brief mentioned therein) before respondent No-1 but of no avail. (Copy of complaint dated 5-08-2022 is attached as ANNEX-F).
6. That respondent No-1 asked for explanation from the appellant vide letter dated 17-08-2022 for some baseless allegation/charges just to harass and humiliate the innocent appellant which was timely replied on 22-08-2022. (Copies of explanation letter and reply are attached as ANNEX-G & H respectively).
7. That the appellant always kept in mental and physical torture, harassment, victimized and discriminated without any cogent reason by respondent No-1; hence respondent No-1 was served through a legal notice. (Copy of legal notice is attached as ANNEX- I).

3

8. That astonishingly by mis-using the power and without lawful authority, respondent No- stopped the monthly salary of the appellant and also wrote a letter of surrendering services of the appellant to respondent No-3. (Copies of letter dated 25-10-2022 and inactiveness of monthly salary are attached as ANNEX-J & K respectively).
9. That the appellant being strong believer in the supremacy of law also filed departmental appeal against the illegal acts, commission and omission of respondent No-1, but of no avail. (Copy of department appeal is attached as ANNEX-L), hence the instant appeal on the following amongst other grounds.

GROUND:

- A. Because, the actions and inactions of the Respondent No-1 by way of changing in the designation of the appellant at own and further the stoppages of monthly salaries without any lawful order passed by the competent authority (Herein after impugned) is patently illegal, unlawful, without lawful authority, of no legal effect and ineffective upon the rights of appellant, hence the respondent No-1 be directed to act in accordance with Law and to be refrain from further harassment, victimizing and discrimination against the appellant and the competent authority may also be intimated to take serious action and initiate departmental inquiry against respondent No-1. The respondent No-1 may also be directed to release the monthly salaries of the appellant without any delay, reason and justification.
- B. Because, the competent authority circulated a letter dated 27-05-2022 to all concerned regarding un authorized practice against officers BPS-17 and above, but respondent No-1 knowingly all these illegally and intentionally ignored and brought some changes in the designation of the appellant just to deprive him from service benefits, hence this act of the respondent No-1 is against the law, rules and regulations thus invites the consideration of this Hon'ble Tribunal. (Copy of letter is attached as ANNEX-M).
- C. Because, the harassment, humiliation, abusive language, misbehavior and misuse of powers of the respondent No-1 is even established from the documents attached and also from his blemished service record. (Copies of necessary documents are attached as ANNEX-N):

4

- D. Because, the appellant while performing his duties with full zeal and zest, was illegally and unlawfully intercepted by respondent No-1 for no any good reason but just to harass and humiliate which is evident from once asked by respondent No-1 to call explanation from lady Doctor Uzba despite the fact that the said lady doctor neither working in the unit of appellant nor made any dis-obedience or negligence before the appellant, hence no inquiry was initiated against the said lady and resultantly respondent No-1 was annoyed.
- E. Because, it is to be added that respondent No-1 also expressed his annoyance with the appellant when the appellant did not joined the striking doctors (instigated by the respondent No-1) in support of registration of FIR against respondent No-1. It is to be added that the appellant is strong believer in the supremacy of law and always performed his duties and conducted surgical operations.
- F. Because, respondent No-1 also expressed his annoyance with the appellant upon the legal request of utilization of medicines supplied to the hospital for poor patients by provincial government which was intentionally utilizing in the health card by the permission of respondent No-1.
- G. Because, the appellant earned good reputation and always did all for the good name of the hospital as well as for the welfare of patients, but due the illegal acts, commissions and omissions and mala fide intentions of respondent No-1 the appellant sustained/caused some mental as well as physical damages for which reserve the right to sue you in the competent court of law both criminal and civil.
- H. Because, respondent No-1 himself violated their own guidelines and directive of high ups on the subject matter, hence intentionally adopted the policy of "pick and choose" and junior most then the appellant was adjusted as head of the department, thus this act of the respondents is against the existing laws and policies.
- I. Because, the appellant is performing his duties till date but not only the appellant is feeling financial hardship to feed the mouth of his whole family but also affected the educational career of children as there is no alternative except the monthly salaries.
- J. Because any other ground which has not been mentioned may also be permitted to rise at the time of hearing.

5

It is, therefore, respectfully prayed that on acceptance of the instant Appeal,

1. This Hon'ble Tribunal may graciously be please to declare the impugned designation "Principal Medical Office" is illegal, unlawful and to be set aside and further restrain respondent No-1 from illegal and unlawful adverse acts against the appellant.
2. Direct the respondents to correct the designation of the appellant in all relevant necessary document/service record as "Chief District Specialist surgery (BPS-20) in the light of recent posting/transfer order dated 06-01-2022 and to be considered against respective post/position.
3. This Hon'ble Tribunal may kindly be please to declare the impugned stoppages of monthly salary of the appellant as illegal, unlawful and Respondent concerned may also be directed to release the monthly salary of the appellant without any further delay, reason and justifications.
4. Any other relief which this Hon'ble Tribunal deems fit under the facts and circumstances of the case may also be awarded in favor of appellant.

APPELLANT

Through

Muhammad Arif Jan

Advocate Peshawar

AFFIDAVIT

I do hereby solemnly affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed

DEPONENT



(6)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2022

Dr. Ali Muhammad Appellant

VERSUS

Medical Superintend DHQ Hospital, Charsadda & others.

..... Respondents

APPLICATION FOR RELEASE OF MONTHLY SALARY OF
APPELLANT TILL FINAL DISPOSAL OF THE TITLED APPEAL.

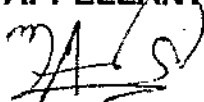
Respectfully Sheweth;

1. That the above titled appeal is being filed today which is yet to be fixed for hearing.
2. That the facts and grounds taken in the body of main appeal may kindly be treated as integral part of this application which making out an excellent prima facie case in favor of the appellant/applicant against the respondents.
3. That all the three ingredients like strong prima facie case, balance of convenience and irreparable losses are in favor of the appellant.
4. That if the monthly salary of the appellant has not been released then not only the appellant but his whole family will suffer financial crises.

It is, therefore, humbly submitted that the application may graciously be allowed in the interest of Justice.

APPELLANT

Through


Muhammad Arif Jan

Advocate Peshawar

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2022

Dr. Ali Muhammad Appellant

VERSUS

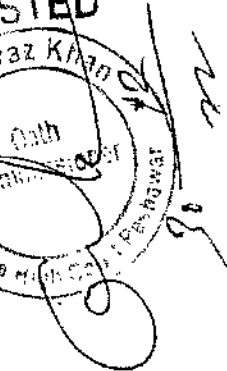
Medical Superintend DHQ Hospital, Charsadda & others.

..... Respondents

AFFIDAVIT

I, Dr. Ali Muhammad Senior District Surgeon (BPS-19) DHQ Hospital, Charsadda do hereby solemnly affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed.


DEPONENT

ATTESTED
Gul Daraz Khan
Oath
Commissioner
Peshawar


8

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2022

Dr. Ali Muhammad Appellant

VERSUS

Medical Superintend DHQ Hospital, Charsadda & others.

..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT

Dr. Ali Muhammad Senior District Surgeon (BPS-19) DHQ Hospital,
Charsadda.

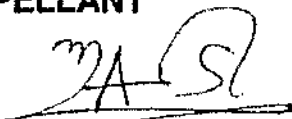
RESPONDENTS.

1. Medical Superintend DHQ Hospital, Charsadda.
2. Govt. of Khyber Pakhtunkhwa through Chief Secretary civil Secretariat, Peshawar.
3. Secretary Health, Government of Khyber Pakhtunkhwa, Peshawar.
4. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
5. District Accounts Officer, Charsadda.

..... Respondents

APPELLANT

Through



Muhammad Arif Jan

Advocate Peshawar

9

Annex-A

OFFICE OF THE
MEDICAL SUPERINTENDENT DHQ HOSPITAL
CHARSADDA

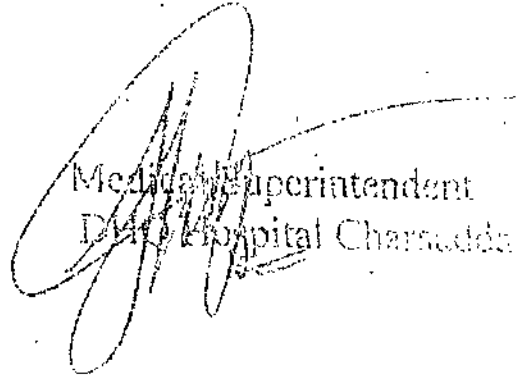
NO 8525 / DHQ HOSPITAL CHD

DATED THE 20/10/2021

NO DEMAND CERTIFICATE.

With reference request of Dr. Ali Muhammad Surgeon Specialist BPS-19 waiting for posting for Posting if posted here in DHQ Charsadda against the vacant post Chief Surgical Specialist BPS-20.

This office has no objection upon his posting to DHQ Hospital Charsadda against the post of Chief Surgical Specialist BPS-20.


Medical Superintendent
DHQ Hospital Charsadda

CTC





GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar, the 6th January, 2022

10

NOTIFICATION

SOH-II/HD/3-760/2015/Vol-III: The Competent Authority is pleased to post Dr. Ali Muhammad, Senior District Specialist Surgery (BS-19) waiting for posting at DHQ Hospital, Charsadda against the vacant post of Chief District Specialist Surgery (BS-20) in his own pay & scale (OPS) with immediate effect, in the best public interest.

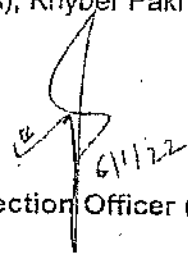
-SD-

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst: of even No. & date:-

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar
2. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Medical Superintendent, DHQ Hospital, Charsadda.
4. The District Accounts Officer, Charsadda & Swabi.
5. The Deputy Director (IT) to upload the notification on official website.
6. The PS to the Secretary Health Govt. of Khyber Pakhtunkhwa, Peshawar.
7. The PS to the Special Secretary Health (E&A), Khyber Pakhtunkhwa, Peshawar.
8. The Doctor concerned.
9. Master file.


Section Officer (Estab-I)

CTC

A



(11)

**GOVERNMENT HEALTH DEPARTMENT KHYBER
PAKHTUNKHWA**

**OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL
CHARSADDA**

OFFICE ORDER

On Arrival of Dr. Ali Mohammad Khan to DHQ Hospital Charsadda, he is directed to perform his duties as chief Surgical specialist BPS-20 in surgical Unit of DHQ Hospital Charsadda

While Dr. Zafar Iqbal will work as Principal Medical Officer BPS-19 and Dr. Zaheer ud din will work as Medical Officer BPS-17 in surgical Department under the supervision of HOD concerned.

Medical Superintendent
DHQ Hospital Charsadda

NO 228-33 /DHQ Hospital Charsadda

dated the 06 /01/2022.

01. Director General Health Services Khyber Pakhtunkhwa Peshawar.
02. Deputy Commissioner Charsadda.
03. PS to Secretary Health Khyber Pakhtunkhwa Peshawar.
04. HOD concerned.
05. All concerned doctors.

For Information & Necessary action.

Medical Superintendent
DHQ Hospital Charsadda

CTC
C



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Amex-B

Dated Peshawar, the 08th February, 2022

NOTIFICATION

12

SOH-I/HD/3-5/2020: Consequent upon their promotion to the post of Senior District Specialist Surgery (BS-19) on regular basis vide this Department's Notification of even number dated 25.01.2022, the following posting /transfer is hereby ordered with immediate effect in the best public interest:-

S.No	Name of doctors	Present position	Promotion
1.	Dr. Javed Iqbal Khan	Senior District Specialist Surgery (BS-19) acting charge basis at DHQ Hospital Haripur	Senior District Specialist Surgery (BS-19) on regular basis against the vacant post at DHQ Hospital Haripur
2.	Dr. Fozail-ur-Rehman Khan	Senior District Specialist Surgery (BS-19) acting charge basis Type-D Hospital Parova D.I.Khan	Senior District Specialist Surgery (BS-19) on regular basis against the vacant post at Type-D Hospital Parova D.I.Khan
3.	Dr. Mujeeb-ur-Rehman	Senior District Specialist Surgery (BS-19) acting charge basis at Cat-D Hospital Thana Malakand	Senior District Specialist Surgery (BS-19) on regular basis against the vacant post at Cat-D Hospital Thana Malakand
4.	Dr. Muhammad Bilal	Senior District Specialist Surgery (BS-19) acting charge basis at DHQ Hospital Charsadda	Senior District Specialist Surgery (BS-19) on regular basis against the vacant post at DHQ Hospital Charsadda.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst: of even No. & date:-

Copy-forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa.
2. The Director General Health Services, Khyber Pakhtunkhwa.
3. The Medical Superintendent, quarter concerned.
4. The District Accounts Officer, quarter concerned.
5. The Deputy Director (IT) to upload the notification on official website.
6. The PS to the Secretary Health Govt. of Khyber Pakhtunkhwa.
7. PS to Special Secretary (E&A) Health Department Govt. of Khyber Pakhtunkhwa, Peshawar.
8. PA to Deputy Secretary (Estab) Health Department Govt. of Khyber Pakhtunkhwa, Peshawar.
9. Doctors concerned.
10. Personal files of the doctors concerned.

[Signature]

Section Officer (Estab-I)

CTC
[Signature]



13

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar, the 09th March, 2022

Arman 'C'

NOTIFICATION

SOH-I/HD/3-5/2019:

The Competent Authority is pleased to transfer Dr. Muhammad Bitai, Senior District Specialist Surgery (BS-19) from DHQ Hospital Charsadda and post him at DHQ Teaching Hospital KDA Kohat, against the post of Senior District Specialist Surgery (BS-19) with immediate effect, in the best public interest.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst: of even No. & date:-

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. Medical Superintendent, DHQ Hospital Charsadda.
4. Medical Superintendent, DHQ Teaching Hospital KDA Kohat.
5. District Accounts Officer, Kohat/Charsadda.
6. Deputy Director (IT) to upload this Notification on official website.
7. PS to the Secretary Health Govt. of Khyber Pakhtunkhwa, Peshawar.
8. PS to the Special Secretary (E&A), Health Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
9. PS to the Additional Secretary (E&A), Health Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
10. Doctor concerned.

(BREKHNA HABIB)
SECTION OFFICER (ESTAB-I)

9/13/22

CTC



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar, the 29th March, 2022

Annex - D

14

NOTIFICATION

NO. SOH-II/HD/3-905/2012: _____ Sanction is hereby accorded to the grant of 90-days (Ninety days) Earned Leave in respect of Dr. Muhammad Bilal, Senior District Specialist, Surgery (BS-19) attached to DHQ Hospital Charsadda w. of 20.03.2022 or from the date of availing (but not more than 10-days of issuance of this notification).

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

ENDST NO AND DATE EVEN

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa.
2. The Director General Health Services, Khyber Pakhtunkhwa w/r to his letter No. 3792-93/E.I dated 10.03.2022.
3. The Medical Superintendent DHQ Hospital Charsadda.
4. District Account Officer, Charsadda.
5. Deputy Director (IT) Health Department Govt. of Khyber Pakhtunkhwa.
6. PS to Secretary Health Govt. of Khyber Pakhtunkhwa, Peshawar.
7. PS to Special Secretary (E&A), Health Govt. of Khyber Pakhtunkhwa, Peshawar.
8. Doctor Concerned.
9. Personal file of the doctor concerned.

SECTION OFFICER (E-I)

c/c

[Handwritten signature]



OFFICE OF THE
MEDICAL SUPERINTENDENT DHQ HOSPITAL
CHARSADDA.

(15)

Amex-
E

OFFICE ORDER.

On Arrival of Dr. Muhammad Bilal District Specialist (Surgery) He is hereby declared as Hod Surgical Unit DHQ Hospital Charsadda and he will be held responsible for managerial and Administrative affairs of Surgical unit DHQ Hospital Charsadda.

Consequent upon the above, Dr. Ali Muhammad is hereby directed to perform his duty as Principal Medical Officer BPS-19.

Medical Superintendent
DHQ Hospital Charsadda.

NO 7816-23 /DHQ Hospital Charadda Dated the 27/05/2022

Copy to the :

1. Director General Health Services Khyber Pakhtunkhw Peshawar.
2. Deputy Commissioner Charsadda.
3. PSO to Health Minister Khyber Pakhtunkhwa Peshawar.
4. PS to Secretary Health Khyber Pakhtunkhwa Peshawar.
5. DMS DHQ & Women & Children Hospital Charsadda.
6. Dr. Muhammad Bilal Surgical Specialist.
7. Dr. Ali Muhammad PMO BPS-19.

27-5-2022

For information and further necessary action.

Medical Superintendent
DHQ Hospital Charsadda

CTC

DDO OPEN AND FILLED POSTS

(1X-X)

PER. NO.	EMPLOYEE NAME	EMP GROUP	POSITION DESCRIPTION	JOB	JOB DESCRIPTION	BPS OP/FILL	TOTAL
186501	SYED ALI ABBAS	7	80041460 CHIEF DISTRICT SPECIALIST (PHYSICIAN)	00105028	CHIEF DISTRICT SPECIALIST (PHY	20 FILLED	1
		7	80041904 CHIEF DISTRICT SPECIALIST (GYNAE)	00105778	CHIEF DISTRICT SPECIALIST (GYN	20 OPEN	1
		7	80042876 DISTRICT SPECIALIST (GASTROENTERO	00104178	DISTRICT SPECIALIST (GASTROEN	18 OPEN	1
		7	90689969 DISTRICT SPECIALIST (EYE)	00102684	DISTRICT SPECIALIST (EYE)	18 OPEN	1
502087	DR. IHSAN-UD-DIN	7	80689970 DISTRICT SPECIALIST (ORTHOAEDIC)	00105030	DISTRICT SPECIALIST (ORTHOAED	18 FILLED	1
		7	80689971 SENIOR DISTRICT SPECIALIST (SURGERY)	00104800	SENIOR DISTRICT SPECIALIST (SU	19 OPEN	1
		7	80689972 DISTRICT SPECIALIST CHILD	00103720	DISTRICT SPECIALIST CHILD	18 OPEN	1
399680	DR ADIL KHAN	7	80689973 DISTRICT SPECIALIST ENT	00104182	DISTRICT SPECIALIST (E.N.T)	18 FILLED	1
372032	DR MUHAMMAD BILAL	7	80740812 CHIEF DISTRICT SPECIALIST (SURGICAL)	00105029	CHIEF DISTRICT SPECIALIST (SUR	20 FILLED	1
		1	80770519 DISTRICT SPECIALIST (DENTISTRY)	00103975	DISTRICT SPECIALIST (DENTISTR	18 OPEN	1
386123	MEHBOOB UL WAHAB	7	80825218 DISTRICT SPECIALIST UROLOGY	00105454	DISTRICT SPECIALIST UROLOGY	18 FILLED	1

C/C

2

16

Government of Khyber Pakhtunkhwa
District Accounts Office Charsadda
Monthly Salary Statement (July-2022)

17



Personal Information of Mr ALI MUHAMMAD d/w/s of ABDUR RAHMAN

Personnel Number: 00428970 CNIC: 2110333551767 NTN: 5632018-7
Date of Birth: 20.06.1968 Entry into Govt. Service: 29.09.2000 Length of Service: 21 Years 10 Months 004 Days

Employment Category: Active Temporary

Designation: PRINCIPAL MEDICAL OFFICER 80814067-GOVERNMENT OF KHYBER PAKII

EDO Code: CA4296-

Payroll Section: 002 GPF Section: 001 Cash Center:

GPF A/C No: JMBJ000059 GPF Interest applied GPF Balance: 312,366.00 (provisional)

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 19 Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	137,670.00	1001	House Rent Allowance 45%	13,284.00
1210	Convey Allowance 2005	5,000.00	1947	Medical Allow 15% (16-22)	3,466.00
1985	Health Professional Allow	88,000.00	2148	15% Adhoc Relief Ali-2013	1,750.00
2199	Adhoc Relief Allow @10%	1,185.00	2347	Adhoc Rel Al 15% 22(PS17)	13,914.00

Deductions - General

Wage type		Amount	Wage type		Amount
3019	GPF Subscription	-7,180.00	3501	Benevolent Fund	-1,500.00
3534	R. Ben & Death Comp Fresh	-1,600.00	3609	Income Tax	-26,604.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 319,245.40 Recovered till JUL-2022: 26,604.00 Exempted: 0.18- Recoverable: 292,641.58

Gross Pay (Rs.): 264,269.00 Deductions: (Rs.): -36,884.00 Net Pay: (Rs.): 227,385.00

Payee Name: ALI MUHAMMAD

Account Number: PLS 3432-3

Bank Details: MCB BANK LIMITED, 240958 LRH ROAD LRH ROAD, PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: BM

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: surgeon.ali2068@gmail.com

CTC

System generated document in accordance with APPM 4.6.12.9(288598/27.07.2022/v3.0)

* All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/31.07.2022/04:14:40)



18

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR**

E-Mail Address: nwtgdgls@yahoo.com office Ph# 091-9210269
Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 1175-1274/AE-I Dated: 21/01/2022

To.


1. All District Health Officers in Khyber Pakhtunkhwa.
2. All Medical Superintendents DHQ: Hospitals in Khyber Pakhtunkhwa.
3. All Hospital Directors, MTI, in Khyber Pakhtunkhwa.

SUBJECT:-

**PROVISIONAL SENIORITY LIST OF ALL DISTRICT
SPECIALISTS BPS-18, BPS-19 AND BPS-20 IN THE HEALTH
DEPARTMENT KPK FOR THE YEAR 2022**

Memo.

Provisional Seniority lists of All District Specialists (BPS-18), (BPS-19) and (BPS-20) serving in the Health Department, Khyber Pakhtunkhwa, prepared by this Directorate are sent herewith for the purpose of circulation amongst all concerned working under your control for their information and confirmation about accuracy of these lists. The lists are also available at official website of the Health Department www.healthkp.gov.pk and this Directorate official website www.dghskp.gov.pk. In case of any objection with regard to the contents of the seniority lists, the same may please be communicated to this Directorate for reconsideration and rectification within Fifteen days (15) of the receipt of this communication.


DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR


No. _____ /AE.I.

Copy forwarded to:-

01. Secretary to Govt: of Khyber Pakhtunkhwa Health Department Peshawar

02. Director DHIS, DGHS Office, Peshawar.

For information with the request to upload these Seniority Lists on the official website of Health Department/DHIS, DGHS Office, Peshawar please.


DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

CTC



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PROVISIONAL SENIORITY LIST OF CHIEF DISTRICT SPECIALIST SURGEONS (BPS-20), AS ON 01.01.2022
SANCTIONED= 10

SL. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST. ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/ PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE	BPS	METHOD OF RECRUITMENT	
1.	Dr.Saifur Rehman, MBBS/MCPS.	13.04.1962/ Mardan	11.04.1996/B-18	a) 11.04.1996 b) 07.05.2010 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	SGTH, Swat
2.	Dr.Sultan Sikandar Bacha, MBBS/FRCS.	30.06.1962/ Swat	12.02.2000/B-18	a) 12.02.2000 b) 28.06.2010 c) 09.10.2019	18 19 20	PSC By Promotion By Promotion	Attached to DHO Swat
3.	Dr.Bakht Sarwar, MBBS/FCPS	01.08.1965/ Dir	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Timergara.
4.	Dr.Muhammad Nasir, MBBS/FCPS.	10.04.1970/ Kohat	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Kohat.
5.	Dr. Rizwan Ahmad, MBBS/ FCPS.	04.04.1971/ Karak	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQ Hospital, Karak.
6.	Dr.Mian Tauseef Uddin, MBBS/FCPS	22.03.1967/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQH, Mardan
7.	Dr.Noor Alam, MBBS/FCPS.	01.09.1965/ Charsadda	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	ESH, Pabbi, Nowshera
8.	Dr.Muhammad Shafiq, MBBS/FCPS.	12.11.1969/ Swabi	17.03.2005/B-18	a) 17.03.2005 b) 03.02.2014 c) 09.10.2018	18 19 20	PSC By Promotion By Promotion	DHQH, Swabi.
9.	Dr.Ghulam Rasool, MBBS/MCPS.	18.01.1964/ Mardan	17.03.2005/B-18	a) 17.03.2005 b) 02.01.2018 c) 09.10.2019	18 19 20	PSC By Promotion By Promotion	Naseerullah Khan Babar hosp; Pesh.

Deputy Director (SRM)
 Government of Punjab, Health
 Department, Lahore

etc

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PROVISIONAL SENIORITY LIST OF SENIOR DISTRICT SPECIALIST SURGEONS (BPS-19), AS ON 01.01.2022
SANCTIONED= 26

SL. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST. ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/PROMOTION TO PRESENT POST.			PRESENT POSTING.
				DATE.	BPS	METHOD OF RECRUITMENT	
1.	Dr. Hayat Shahzad S/O Khan Shahzada, MBBS	01.04.1971/ Dir	25.10.2007/B-18	a)25.10.2007 b)02.01.2018 c)09.10.2019	18 19 20	PSC By Promotion By Promotion	DHQH, Batkhela. (On Acting Charge Basis)
2.	Dr. Muhammad Islam S/o Kabal Khan.	04.03.1970/ Upper Dir	23.06.2009/B-18	a) 23.06.2009 b) 22.05.2018	18 19	PSC By Promotion	DHQH, Upper Dir
3.	Dr. Habib Ahmad Batkhtiar.	15.04.1970/ Dir	23.06.2009/B-18	a) 23.06.2009 b) 22.05.2018	18 19	PSC By Promotion	DHQH, Timergara.
4.	Dr. Dildar Hussain S/O Ashiq Hussain.	03.10.1965/ Kurram Ag.	23.06.2009/B-18	a) 23.06.2009 b) 22.05.2018	18 19	PSC By Promotion	DHQH, Haripur.
5.	Dr. Makil Shah S/O Gul Mir Shah.	01.06.1965/ Bannu	16.09.2009/B-18	a) 16.09.2009 b) 22.05.2018	18 19	PSC By Promotion	THQH: Tangi Charsadda
6.	Dr. Ali Muhammad S/O Abdul Rehman,	20.06.1968/ Bajaur Agy.	11.02.2010/B-18	a)11.02.2010 b)09.10.2018	18 19	PSC By Promotion	DHQH, Bajaur
7.	Dr. Abdul Waheed Jan, MBBS/FCPS.	22.01.1970/ Lakki Marwat	15.01.2011/B-18	a) 15.01.2011 b) 22.05.2018	18 19	PSC By Promotion	DHQH: Lakki Marwat.
8.	Dr. Gul Sher, MBBS/FCPS	18.10.1962/ FR, Bannu.	15.01.2011/B-18	a) 15.01.2011 b) 22.05.2018	18 19	PSC By Promotion	KGNTI, Bannu
9.	Dr. Muhammad Hamayun, MBBS/FCPS	28.08.1978/ Bajaur Agy.	15.01.2011/B-18	a) 15.01.2011 b) 22.05.2018	18 19	PSC By Promotion	BKMC, Swabi
10.	Dr. Sarferaz Ahmad, MBBS/FCPS	05.09.1964 Abbottabad.	15.01.2011/B-18	15.01.2011 09.10.2018	18 19	PSC By Promotion	ESH Pabbi Nowshera
11.	Dr. Asghar Ali Khan, MBBS/FCPS	08.05.1972/ Dir	15.01.2011/B-18	15.01.2011 09.10.2018	18 19	PSC By Promotion	THQH, Dargai Malakand.

Deputy Director (Health)
District Health Services K.P. Peshawar

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12.	Dr. Alamgir, MBBS/FCPS	09.11.1972/ FR DIKhan.	15.01.2011/B-18	15.01.2011 09.10.2018	18 19	PSC By Promotion	THQH, Paroa DIKhan
13.	Dr. Zia-Ur-Rehman, MBBS/FCPS	03.02.1962/ Bujaur Agy.	15.01.2011/B-18	15.01.2011 09.10.2018	18 19	PSC By Promotion	THQH Wari U/Dir
14.	Dr. Muhammad Nabi, MBBS/FCPS	18.08.1969/ SW Agy	15.01.2011/B-18	15.01.2011 09.10.2018	18 19	PSC By Promotion	THQH, Havlian Abbottabad
15.	Dr. Tariq Mahmood, Jani, MBBS/FCPS	11.01.1966 Peshawar.	15.01.2011/B-18	15.01.2011 07.01.2019	18 19	PSC By Promotion	THQH, Tangi, Charsadda.
16.	Dr. Aziz Ullah, MBBS/FCPS	02.02.1972/ Dir.	15.01.2011/B-18	15.01.2011 07.01.2019	18 19	PSC By Promotion	DHQH Bakhela
17.	Dr. Muhammad Khan, MBBS/FCPS	01.11.1974/ SW, Wana.	15.01.2011/B-18	15.01.2011 07.01.2019	18 19	PSC By Promotion	RHC, Badaber, Peshawar.

PROVISIONAL SENIORITY LIST OF DISTRICT SPECIALIST SURGEONS (BPS-18), AS STOOD ON 01.01.2022
SANCTIONED= 16

SL; NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION.	DATE OF BIRTH AND DOMICILE	DATE OF IST: ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT /PROMOTION TO PRESENT POST			PRESENT POSTING.
				DATE.	BPS	METHOD OF RECRUITMENT	
1.	Dr. Zubair Ahmad Khan S/O Muhammad Aslam	19.08/1966/ Peshawar	08.10.2007/B-18	08.10.2007	18	PSC	(1095 days leave 1.4.2017)
2.	Dr. Ejaz Ahmad S/O Sail Badshah, MBBS	09.09.1970/ Karak	10.09.2008/B-18	10.09.2008	18	PSC	KGNTH, Bannu
3.	Dr. Sajjad Hussain S/O Mir Rehman.	30.03.1968/ Mardan	23.06.2009/B-18	23.06.2009	18	PSC	DHQH, Mardan.
4.	Dr. Wazir Hassan S/O Mir Hassan.	04.03.1962/ N.W. Agy.	23.06.2009/B-18	23.06.2009	18	PSC	AHQH, Miranshah.
5.	Dr. Sultan Muhammad S/O Zarin Khan.	01.06.1966/ N.W. Agy.	01.08.2009/B-18	01.08.2009	18	PSC	AHQH: Miranshah.
6.	Dr. Arshed Nawaz Khan MBBS/FCPS	09.04.1973/ Dir	15.01.2011/B-18	15.01.2011	18	PSC	AHQH: Bakhela.
7.	Dr. Sardar Hussain, MBBS/FCPS	01.03.1973/ Dir	15.01.2011/B-18	15.01.2011	18	PSC	THQH, Dargai, Malakand Agency.

Director (HRM)
Director of Health
Services Peshawar

etc

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8.	Dr. Javed Iqbal Khan S/O Muhammad Iqbal	07-07-1975/ Haripur.	01.10.2013/B-18	01.10.2013 07.01.2019	18 19	PSC By Promotion	DHO, Hospital, Haripur. (Promoted on acting charge basis).
9.	Dr. Nisar Ahmad S/O Muhammad Yousaf	25.02.1974/ Swat	01.10.2013/B-18	01.10.2013	18	PSC	DHO, Hospital, Alpuri, Shangla
10.	Dr. Fozailur Rehman Khan S/O Fazalur Rehman Khan.	12-02-1966/ DIKhan	01.10.2013/B-18	01.10.2013 07.01.2019	18 19	PSC By Promotion.	DHO, Hospital, DIKhan (Promoted on acting charge basis).
11.	Dr. Muhammad Mujibur Rehman S/O Muhammad Said Jan	01-04-1976/ Bajaur	01.10.2013/B-18	01.10.2013 07.01.2019	18 19	PSC By Promotion	Category-C Hosp: Totakan, Malakand (Promoted on acting charge basis).
12.	Amanullah S/O Gul Marjan Bhattani	21.05.1972/ FR DIKhan	01.10.2013/B-18	01.10.2013	18	PSC	THQ: Hosp: Parou, DIKhan.
13.	Dr. Muhammad Bilal S/O Aman Ullah	06.11.1975/ DIKhan.	01.10.2013/B-18	01.10.2013 07.01.2019	18 19	PSC By Promotion. 2	DHQ: Hospital, Charsadda (Promoted on acting charge basis).
14.	Dr. Misbah Ullah Dawar S/O Noor Muhammad.	16-03-1974/ NW Agency	01.10.2013/B-18	01.10.2013	18	PSC	DHQ: Hospital, Mansehra.
15.	Dr. Muhammad Asghar Khan S/O Eidat Shah	04.02.1974/ Orakzai	19.11.2013/B-18	19.11.2013	18	PSC	DHQH, Hangu
16.	Dr. Jamil Anwar S/O Muhammad Hasham.	01.04.1964/ Karak	24.12.2013/B-18	24.12.2013 07.01.2019	18 19	PSC By Promotion.	Farid Khan Shaheed Memorial Hosp: Hangu. (Promoted on acting charge basis).
17.	Dr. Ashab Noor S/O Awsan Gul, MBBS	03.02.1967/ NW Agency	23.06.2015/B-18	23.06.2015	18	PSC	RHC, Gara Tajik, Peshawar.

Deputy Director (HRM)
Directorate of Health
Services K.P. Peshawar

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18.	Dr. Tariq Nawaz S/O Fuqir Nawaz	10-05-1972 Bannu	04-08-2016/B-18	04-08-2016	18	PSC	THQH, Serai Nauring, Iakki
19.	Dr. Kishwar Ali S/O Wafa Muhammad	01.01.1984/ Swat	04-08-2016/B-18	04-08-2016	18	PSC	CH Madyan Swat
20.	Dr. Zainuddin S/O Sher Afzal	15.04.1970/ FR Tank	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Hosp; Panila DIKhan.
21.	Dr. Muhammad Amin S/O Gul Aminzaib	31-12-1974/ Bajaur Agy	04-08-2016/B-18	04-08-2016	18	PSC	DHQH, Timergara L/Dir
22.	Dr. Muhammad Umar Hamed S/O Muhammad Hafeez	15-04-1982 Tank	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Hosp; Pharpur, DIKhan.
23.	Dr. Faisal Ahmad s/O Said Bacha	04-02-1973 Swabi	04-08-2016/B-18	04-08-2016	18	PSC	DHQH, Swabi
24.	Dr. Anwar Syed S/O Mian Shah Ristan.	04-04-1982 Swat	04-08-2016/B-18	04-08-2016	18	PSC	SGTH, Swat
25.	Dr. Imtiaz Ahmad Khattak S/O Mir Sahib Khan	14.01.1983/ Karak	04-08-2016/B-18	04-08-2016	18	PSC	W&C Hospital, Kohat.
26.	Dr. Mohsin Ali S/O Jamshid Ali	30-04-1980/ Swat	04-08-2016/B-18	04-08-2016	18	PSC	CH, Kalam, Swat
27.	Dr. Naveed Sultan S/O Sultan Room Khan	29-10-1982/ Swat	04-08-2016/B-18	04-08-2016	18	PSC	CH, Kabal, Swat
28.	Dr. Zaffar Iqbal S/O Nazir Syed.	11-12-1978 Mohmand A	04-08-2016/B-18	04-08-2016	18	PSC	BKMC, Swabi
29.	Dr. Nadir Saifullah S/O Saifullah Khan	12-06-1982/ Battagram	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Hosp; Bana, Battagram
30.	Dr. Fazal Manan S/O Abdul Wadood.	19-04-1973 Bajaur Agy	04-08-2016/B-18	04-08-2016	18	PSC	DHQ
31.	Dr. Muhammad Nadeem S/O Gul Zuman Khan	15-01-1978 Swat	04-08-2016/B-18	04-08-2016	18	PSC	SGTH, Swat
32.	Dr. Khan Karim Afridi S/O Abdul Karim Afridi	03-05-1982/ FR Kohat	04-08-2016/B-18	04-08-2016	18	PSC	DHQH, Kohat
33.	Dr. Saeeda D/O Sarzamin Khan	04-12-1982 Mardan	04-08-2016/B-18	04-08-2016	18	PSC	THQH, Shahbaz Ghari, Mardan


 Deputy Director (HRM)
 Directorate of Health Services
 M.A. Peshawar

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34.	Dr. Shahid Alan S/O Abdul Hakim	01-04-1969 Swat	04-08-2016/B-18	04-08-2016	18	PSC	SGTH, Swat
35.	Dr. Arshad Aziz S/O Shahi Jahan.	19-10-1976 SW Agy	04-08-2016/B-18	04-08-2016	18	PSC	DHQH, Lakki Marwal.
36.	Dr. Ashfaq ur Rehman S/O Latif ur Rehman	11-04-1982 NW Agency	04-08-2016/B-18	04-08-2016	18	PSC	NKBMH, Kohat Road, Peshawar
37.	Dr. Ahmad Din S/O Rasool Muhammad	01-03-1975 NW Agy.	04-08-2016/B-18	04-08-2016	18	PSC	DHQH, Hangu.
38.	Dr. Samiullah S/O Panida Muhammad	25-05-1980 U/Dir	04-08-2016/B-18	04-08-2016	18	PSC	DHQH, U/Dir.
39.	Dr. Hafiz Gul Nasib Khan S/O Gul Sharif Khan	14/06/1981 Battagram	04-08-2016/B-18	04-08-2016	18	PSC	DIQH, Battagram
40.	Dr. Musarrat Hussain S/O Haji Alams Khan	20-09-1973 Peshawar	04-08-2016/B-18	04-08-2016	18	PSC	THQH, Dargai Malakand.
41.	Dr. Ghulam Faqir S/O Umar Muhammad	01-12-1969/ Bajaur Agy	04-08-2016/B-18	04-08-2016	18	PSC	Category-D Hosp: Munda L/Dir
42.	Dr. Muhammad Humayun S/O Mir Khatim Khan	23.03.1983/ SW Agy	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Hosp: Hawaylia, Abbottabad
43.	Dr. Asghar Khan S/O Khan Saeed	16-04-1981 Bajaur	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Ghazi Haripur
44.	Dr. Bilal Khattak S/O Jehanzeb Khattak	04-05-1978 Charsadda	04-08-2016/B-18	04-08-2016	18	PSC	THQ: Hospital Charsadda
45.	Dr. Muhammad Kashif S/O Abdul Munaf	25-04-1976 Swabi	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Nerai Niamat Shah
46.	Dr. Saman Naz D/O Saeed	02-10-1979/ Abbottabad	04-08-2016/B-18	04-08-2016	18	PSC	THQH, Boi Abbottabad.
47.	Dr. Syed Zameer Ali S/O Syed Hussain Afral	26-05-1976 Orakzai Ag	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Hosp: Latambar, Karak
48.	Dr. Arshad Amin S/O Salahuddin	11-01-1975 Swabi	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Hosp: Kalu Khan, Swabi.
49.	Dr. Hameed Khan S/O Shadecm Khan	15-12-1976 NW Agy	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Hosp: Rustam Mardan
50.	Dr. Waseem Ahmad S/O Safin Muhammad	25-09-1982 DIKhan	04-08-2016/B-18	04-08-2016	18	PSC	DHQH, DIKhan

Director General (P&M)
Director General Health
Services P.R. Peshawar

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51.	Dr. Muhammad Islam S/O Sheikhul Islam	05-03-1967 Nowshera	04-08-2016/B-18	04-08-2016	18	PSC	DHQH, Nowshera.
52.	Dr. Falzur Rehman S/O Hafiz Kifayatullah	04-04-1976 Swabi	04-08-2016/B-18	04-08-2016	18	PSC	Category-D Hospital Kalo Khan Swabi
53.	Dr. Muhammad Hussain S/O Shah Jehan	01-07-1979 Swat	04-08-2016/B-18	04-08-2016	18	PSC	CH, Barikot, Swat
54.	Dr. Abdur Rehman S/O Fazal Rehman	00-00-0000 Bajaur Agy	04-08-2016/B-18	04-08-2016	18	PSC	Type-D Hosp: Wahari, L/Dir.
55.	Dr. Shazma Begum D/O Mohbat Khan	01-11-1981 Swabi	04-08-2016/B-18	04-08-2016	18	PSC	KATH, Mansehra.
56.	Dr. Mujeeb Rehman S/O Hameedur Rehman	Buner	05.10.2016/B-18	05.01.2016	18	PSC	
57.	Dr. Zia-Ur-Rehman S/O Ghulam Nabi,	Malakand	05.10.2016/B-18	05.1.2016	18	PSC	Attached to DHO Malakand
58.	Dr. Talat Shahzad S/O Rafiqat Ali	Haripur.	05.10.2016/B-18	05.1.2016	18	PSC	BBSH Abbottabad.
59.	Dr. Aurangzeb Khan S/O Sherin Wali	27.03.1980/ NW Agy	05.10.2016/B-18	05.01.2016	18	PSC	MMC, Mardan.
60.	Dr. Mushtaq Ahmad S/O Abdul Malik	Peshawar	05.10.2016/B-18	05.1.2016	18	PSC	CH Alcora Khattak, Nowshera.
61.	Dr. Niazuddin S/O Bahadur Din.	00/00/0000 Swabi	05.10.2016/B-18	05.1.2016	18	PSC	DHQH, Swabi
62.	Dr. Irshad Ali Khan S/O Sher Ali Khan.	00/00/0000 Swat	05.10.2016/B-18	05.01.2016	18	PSC	SGTH, Swat
63.	Dr. Khalid Mahmood, MBBS	26.06.1967/ DIKhan.	10.04.2017/B-18	10.04.2017	18	Under Act 2017	AP, BKMC, MARDAN
64.	Dr. Atif Faheem S/O Fateh Ullah, MBBS	13.06.1977/ DIKhan.	10.04.2017	10.04.2017	18	Under Act 2017	Attached to DHO DIKhan
65.	Dr. Bakhtiar Alam S/O Shah Zahir	01.08.1977/ Khyber Agy.	10.04.2017	10.04.2017	18	Under Act 2017	DHQH, Landikotal.
66.	Dr. Haib Nawaz Ahmad S/O Qulzar Ahmad	12.04.1978/ Charsadda	10.04.2017	04.10.2017	18	Under Act 2017	Category-D Hosp: Totkan, Malakand.
67.	Dr. Muhammad Hayat Khan S/O Badshah Gul	12.11.1972/ Bajaur Agy	26.03.2018	26.03.2018	18	PSC	THQH, Bera Dist: Khyber.
68.	Dr. Abul Wakil S/O Muhammad Ibrahim	04.02.1971/ Swat.	27.03.2018	27.03.2018	18	Under Act 2018	THQH, Matta Swat.

Deputy Director (HRM)
Directorate of Health
Services, Peshawar

CC

To,

The Medical superintendent,,

DHQ hospital charsadda.

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Amex - F

Subj. Refusal and wilful absence of medical and allied staff from ward ,OT and OPD duty on my day.

With due veneration to state that for the last two months (since you have made my then house officer and now my junior as ward in charge as a reward of his excellent services for the hospital for which he was also transferred out as a punishment), nobody is coming to my round ,OPD and OT. A junior technician or a staff nurse assess me in the OT I do my round with ward orderly. Making discharge slip myself or with technician. This has been reported several times but in vain. Today and yesterday day too ,the house officers also refused to obey the orders. Do you think if the administrator of an institution is not on the backs such people , they will dare to do like that ?? Never.

If you favour somebody for any reason and want to bestow him / her with a privilege , yes do it but not on the cost of someone's rights You are well aware of everything and the list is very long but this is enough to digest , I will not allow anybody to ridicule me .Being a senior most surgeon, I must be provided with a permanent/ monthly basis (not SOS) nominated staff sufficiently skilled in the field so that I can work with peace of mind and help the poor masses. The today list I did alone is attached here with. Even on demand no body came to my round and OT.

NB. Whereas Doctor Bilal has broken my office lock in my absence and some of my instruments and other daily usage things ask him to replace all the things by tomorrow .

Hope I have conveyed my message and you got it .

Thanks

sincerely yours

Dr Ali Muhammad

Date 05.08.2022

I/C surgical specialist BPS-19

DHQ charsadda.

Copy to

1. District monitoring officer
2. Deputy commissioner Charsadda
3. DGHS Peshawar
4. PS to secretary Health kp

CTC

11. 127

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Annex - G

OFFICE OF THE MEDICAL SUPERINTENDENT
DISTRICT HEADQUARTERS HOSPITAL CHARSAKDA.

10267-71 DHO Hospital CHD

dated the 17/08/2022

Dr. Ali Muhammad
Senior Surgeon DHO Charsakda

EXPLANATION.

It has been observed with great concern that Medical officers,
in name of Surgical Unit, submitted complaint regarding your attitude in behavior
(copy is attached).

In view of the above mentioned you are directed to explain your position
in view of the said points of complaints.

Medical Superintendent
DHO Hospital Charsakda

Dated the 17/08/2022

M/S DHO Charsakda
Copy to the

- 1. Deputy Commissioner Charsakda.
- 2. District Officer Health, Feroze Paktunkhwa Peshawar
- 3. District Secretary Health, Feroze Paktunkhwa Peshawar
- 4. Head Surgical Unit.

For information and necessary action

Medical Superintendent
DHO Hospital Charsakda

Please provide the names of
the consultants along with the complaint.
Because I have not seen any consultant
in the unit on my duty day which
has been submitted in detail in your
file and with DMS too. Only then can

CAC

[Signature]

PE
P10

To

The Medical superintendent,

DHQ hospital charsadda.

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Subject .clarification of your false statement in your fraudulent inquiry against me.

With due respect it is stated that you sent me an explanation letter No 102067-71 dated 17.08.2022 delivered to me on 18.08.2022 in my OPD in which you stated that the consultants of the unit have given a complaint against your conduct and you are required to explain your position. This was an unsigned letter .I wrote as foot note on that explanation letter that please provide me names of the complainants and the complaint copy so that I can reply properly. I was waiting for copy of that complaint till date. Today on 22.08.2022 you sent a letter No 10411-16 which was basically addressed to the inquiry committee which states that "this document comprises the complaint copy and reply of Dr Ali Muhammad "to the complaint .

Dear sir ,the letter you are claiming my reply is a letter which I have written 20days back on 05.08.2022 regarding wilful absence of medical staff on my duty and first was share with DMS Dr jalal on WhatsApp and discussed the issue with him for two days and submitted in hard copy too and he promised to he discussed with MS sb. Respected Sir I am still waiting for you to provide me the complaint copy so that I can reply before you proceed further. Further more, the clash is between me and you and the committee members are your subordinates they can't conduct inquiry against you. Therefore these committee members are bias for me and they are not acceptable to me as my inquiry officers because they were also supposed to give me first the copy of complaint. This inquiry only be conducted by health department itself or officers of unbiased nature from other departments. So after receiving copy of this application all the committee members are requested to withdraw their names from the inquiry.

Thanks.

Dated 22.08.2022

sincerely yours

Dr Ali Muhammad

Senior district surgeon BPS-19

DHQ hospital charsadda .

Copy to

1. All the inquiry members.
2. DGHS Peshawar.
3. Secretary Health kp .

CTC



DGHS.

280157

23/8/22

127

A. Lateef Afridi

Advocate
Supreme Court of Pakistan
And High Courts.

29

Annex-I

Off: 091-2572888
Mob: 0313-3858543
Email: lateefafriidi@yahoo.com

Ref. No. LN/12/2022

Date 09.09.2022

To,

The Medical Superintendent,
DHQ Hospital,
District Charsadda.

Subject: NOTICE FOR THE RECOVERY OF DAMAGES

Dear Sir,

I have been instructed and duly authorized by my client Dr. Ali Muhammad S/o Abdul Rehman (BPS-19) Surgeon in DHQ Hospital Charsadda to serve you with this Notice. The facts and grounds of which are as under:

1. That my client Dr. Ali Muhammad was promoted to BPS-19 in November 2018 vide Order dated 01.11.2018 and thereafter, when your goodself issued No Objection Certificate to him that he be posted at DHQ Hospital Charsadda and since then, my client is performing his duty as a qualified Surgeon. It may be noted that my client Dr. Ali Muhammad beside holding MBBS degree, is also possessing FCPS in General Surgery.
2. That on 05.04.2022, my client Dr. Ali Muhammad was asked by you to call the explanation of Dr. Uzba that she is not performing her duties and thus because of her neglect of duties, the patients are suffering.
3. That my client Dr. Ali Muhammad checked the list of his unit and found that Dr. Uzba is not working in his unit and thus he informed you that the said lady doctor is not in the unit of my client, hence he declined to issue any explanation letter to the said Dr. Uzba. This annoyed you and you accused my client of disobedience.
4. That you also expressed annoyance with my client when he did not join the striking doctors in support of registration of an FIR against you. My client continuously performed his duties and conducted surgical operations as he did not join the doctors' strike instigated by you. My client also informed you that for the medicines supplied to the hospital for poor patients by provincial government cannot be utilized in the Health Card as this amounts to double expenses on one count which is illegal. You displaying courage before the doctors said that I am the Provincial Government and don't mind use this medicine in the Health Card cases.
5. That the stance of my client Dr. Ali Muhammad has always been correct on legal basis but you took it as an ill-will and started victimizing my client by issuing illegally explanation calls to him and despite the fact that my client is a senior surgeon in BPS-19 and was posted accordingly but in order to victimize him, you brought a junior person (Dr. Muhammad Bilal) and made him the Head of the Unit who is junior to my client according to the Provincial Seniority List of District Specialists. My client in the Provincial Seniority List is at Sr. # 6 while Dr.

CTC



A. Lateef Afridi

Advocate

Supreme Court of Pakistan
And High Courts.

30

- Off: 091-2572888

Mob: 0313-3858543

Email: lateefafriidi@yahoo.com

Ref: No. _____

Date 09/09/2022

Muhammad Bilal is at Sr. # 35, Please note that this junior person Dr. Muhammad Bilal was transferred by you on the charge of negligence to patients. But your orders, surprisingly you made Dr. Muhammad Bilal the In-charge of the Surgical Unit, transferred the staff of my client to him and my client have hardly one Doctor on request which may or may not come on regular basis. Is this fair and legally just?

6. That the above acts and actions have mentally tortured my client as prima facie, your actions are illegal, much less malicious and they do not reflect the welfare of the patients in hospital or improvement in the health services. On the contrary, this has caused concern amongst the doctors and staff and each one stands terrorized.
7. That your illegal and malicious acts have adversely affected my client's efficiency as well as his contribution to health services at the hospital for which he will be held responsible.
8. That my client intends to sue you for damages worth Rs. 20 Millions as far as torture is concerned and he also desires to approach to the High Court against your malicious acts which amount to misconduct as a Medical Superintendent.
9. To add fuel to the fire, you have also changed the designation of my client from Senior District Specialist who was working on BPS-20 and now you called him Principal Medical Officer (PMO). You also changed the designation of my client in Pay Roll from Senior District Specialist to Principal Medical Officer which you have done with malice and malafide on your part.
10. That unless, you reverse all your illegal acts against my client and allow him to work on his designated job, besides, regretting your illegal acts, my client will sue you shortly for Rs. 20 millions as damages caused to him due to torture as well as causing damages to his reputation. My client also is considering seriously to burden you with criminal liability. In case you have anything to offer in this behalf in defence/explanation, inform the undersigned within 07 days of the receipt of this notice or else, my client will file a civil suit of damages against you thereafter. In case of litigation, the burden of cost will be on your shoulders.

Regards

A. Lateef Afridi

Advocate Supreme Court of Pakistan

A. Lateef Afridi
Advocate

7-B Haroon Mansion Khyber
Bazar Peshawar.

Note:

- i. A copy of this legal notice has been retained in my office for further necessary action.
- ii. Copy to Dr. Ali Muhammad.
- iii. Copy to Secretary Health Services KP.

CTC

Advocate

(31)

Annex - J

OFFICE OF THE
MEDICAL SUPERINTENDENT DHQ HOSPITAL
CHARSADDA.

No. 12895-98 / DHQ HOSPITAL CHARSADDA DATED the 25/10/2022.
TO.

The Secretary Health
Government Khyber Pakhtunkhwa Peshawar.

Through The Regional Additional Director General
Health Khyber Pakhtunkhwa Peshawar

Subject : SURRENDERING SERVICES OF DR. ALI MUHAMMAD BPS-19

Sir,

Its brought into your kind notice, that the said Doctor is highly problematic and creating problems in smooth running of the Institution, may please be posted out of this hospital on administrative grounds on account of the following facts:

The moment he was posted to this hospital, he started victimizing different doctors, house Officers and even the staff nurses that they are not cooperating with him.

He started polarization in the ward and explanation called from him as annex-A.

Then he started instigating doctors against the administration copy attached herewith As annex-B

Then he remained absent from duty on different occasions and used to come and go on will without following the rules.

Then all the doctors, House Officers and Nurses submitted written complaint against his Attitudes and objectionable behavior, an inquiry was conducted by four HODs in which he was held guilty. But he put the whole blame over the undersigned. Copy of complaint attached as Annex-C


Again he left the hospital on 11-Am which was operation day, without any information or permission. Copy of explanation attached herewith annex-D

He is involved in referring the patients from this hospital to Jinnah Hospital Peshawar, who could easily be operated over here.

He misbehaved with Dr. Shahzad, who submitted a written complaint against him attached As Annex-E

Every time explanation called from him, he put blame over the undersigned, & pressurizing the undersigned through notices of lawyers. Copy attached herewith as Annex-F

It is humbly requested that his previous record may viewed as he has been posted Out from a number of hospital on account of his attitude and behavior.

CTC


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Therefore he may please be posted out of this Hospital as soon as possible,
and his services are surrendered to the Department.

Medical Superintendent,
DHQ Hospital Charsadda

NO/2875-⁵⁰92/DHQ Charsadda

Dated the 25/10/2022.

Copy forwarded to the:

1. Deputy Commissioner Charsadda
2. PSO to Minister Health Khyber Pakhtunkhwa Peshawar.
3. PA to Director General Health Services Khyber Pakhtunkhwa Peshawar.

For information and necessary action,

Medical Superintendent
DHQ Hospital Charsadda

CTC



PAY ROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

33 Annex - 'K'

FORM : PAY 02

Date

Page No.

National ID Card No.

OFFICE OF THE MS DHQ HOSPITAL CHARSADDA.

DDO CODE (COST CENTER) C A 4 2 9 6

PERSONNEL NUMBER 0 0 4 2 8 9 7 0 Employee Name: DR. ALI MUHAMMAD

GRADE (PAY SCALE GROUP) 1 9 SURGEON

Salary Status: Start. Stop.

Info Type	Field ID	GENERAL DATA CHANGE	Wage Type	CHANGE IN PAYMENTS / DEDUCTIONS			Effective Date	Remarks
		New Contents		Amount	Basic	Perisa		
		salary status	117	ACTIVE >>>>>>>> i				
				IN ACTIVE				salary may be stopped in light of the attached order.
					117			
								verified by
								12/2022

Prepared By

CSC

Initiated / Checked By

[Signature]

Entered / Verified By

Medical Officer
MS DHQ Hospital
Charsadda

Repeat copy.

Annex -

(34)

To

The Secretary Health,
Govt of Khyber Pakhtunkhwa, Health Department,
At Peshawar.

Dairy No. 11692
Date. 27-8-2022
Health Department

SUBJECT . DEPARTMENTAL APPEAL.

I have the honour to state that I am a commissioned District surgical specialist in Health Department KP and promoted to BPS-19 in November 2018. I have been transferred to DHQ Hospital Charsadda vide Health Department Notification No SOH-1/-1/HD/3-760/2015 dated 06.01.2022 as senior District Surgical Specialist BPS-19.(copy along with certificate of transfer of charge attached).

After my arrival and taking charge there was an other surgeon Dr Muhammad Bilal district specialist BPS-18 was working. The work load was divided as alternate day OPD and OT. Then Dr Muhammad Bilal was also promoted to BPS-19 on 08.02.2022 under the notification No SOH-1/HD/3-5/2020.(copy attached).

Then the MS conducted an inquiry against Dr Bilal due to some misconduct and was reported to the Health department KP to be transferred out and so he was transferred on 09/03/2022 under the notification No SOH-1/HD/3-5/2019(copy attached).

Now again MS Dr Jehanzeb and Dr Bilal patch up and the MS gave NOC to Dr Bilal and did his transfer back to DHQ Charsadda (rumours regarding this patch up are in the market but I have no proof that how a person transferred on administrative grounds became a blue eyed sweet heart in one and a half months)..notification of his reposting has not yet exposed but all of sudden the MS issued an office order that Dr Bilal will be head of department, Dr Waqas an FCPS qualified surgeon in BPS-17 General Cadre will be working as consultant (who was a medical officer till yesterday) and Dr Ali Muhammad senior District surgeon BPS-19 will work as a principal medical officer (copy attached. Such fraudulent changes to someone's records / documents is forgery and a punishable crime. The nominated head of department made their duty roster and since then nobody is coming to my round on the behest of MS. The Medical officer has been given the consultant status for he will enjoy the post / duties of consultant and the sehatsahulat card shares of his name will go to the MS, though we have a BPS-19 FCPS qualified surgeon but working as medical officer.

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o/c

(35)

The reason behind this is that I didn't favoured and accepted the MS directive in few things and he became against me. These are as follow

In the month of Ramadan I don't know the exact date the MS had a clash with some media personnel and he registered/lodged FIR against the MS and he is still on BBA. The MS directed all the hospital staff to do strike on daily basis from 8am to 10am in his favour and solidarity. Some of the employees supported his suggestion and would go on strike daily from 8am to 10am for two weeks and the MS would monitor it on CCTV cameras from his home. After 10am would come to his office. I didn't became part this strike as being a government servant the existing rule not permitted me to involve in any personal matter of any body including MS, so he was not happy with me. Even I asked the DMS that this thing is to be avoided and is not good for the institution.

second thing was the use of MCC medicines for sehat card patients which he was doing because once purchased medicines for poor patients should not be sell in any form like sehat card ,though we all followed his order being an administrator till the medicines finished.

Another reason he was not happy with me was that: in the month of march 2022 he deputed a female Dr uzba, a divorced girl having one female kid to our unit. We assigned her duties in the roster. One day the MS asked regarding her presence. I told him that at the moment I have no roster in hand but I will call the registrar. I asked the registrar about her duty and he said that her duty today is in the evening OPD but the MS said that I have reported her to DGHS and she has been relieved from DHQ Charsadda. I asked that if you have relieved her then it should have been communicated to us with arranging a replacement.

One month later the MS asked me to call explanation of Dr Uzba when she not with us. I was astonished to hear this from the MS. I told him that Sir she is not with us but he was insisting. The registrar was also asked about the said thing. Then I sent the medical officers list on our strength where there was no name of Dr uzba.....connecting the dots to reach the cause was not our headache, and since then a queue of explanations for no reasons started.

Respected Sir a humble request is made to look into the matter on compassionate grounds and solve the problem. I am not going to follow the changes he had made ,if anything happen unpleasant the MS will be responsible for that. I am not going to accept my junior as my boss

CTC
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HOD at any cost without a solid reason. This is a district hospital not an MTI . Units are not run like this. This favouritism will also create problems for department and me as well. This is a big example of misuse of authority and must be stopped.


As for as the changes of my posting order are concerned, its a case of forgery and he will face me in the court. As all surgeries in the government hospitals are done under cover of schatsahulat card the department as well as the doctors are getting their respective shares but the MS has given my days to a junior MO and getting his shares for his un lawful support and assigning as consultant, this is clear bribe and need to be stopped in earliest..

Therefore it is hope that your good self may probe into the matter, provide me my right affected due to the un lawful order issued by the MS DHQ Hospital Charsada and also resolve the issues created by the MS, so that I can work with peace of mind.

I shall remain thankful for your kind cooperation.

Thanks

18.05.2012

Yours Obediently

Dr Ali Muhammad
Senior District Surgeon DHQ
Charsadda

Email surgeon.ali2068@gmail.com
Ph # 03153344833

Copy to the :

- 1- PS to Minister Health KP
1. DGHS KP Peshawar
- 3 Deputy commissioner Charsadda
4. District Monitoring Officer IMU ,
5. Governor inspection team.
6. Incharge Circle Officer Anti-Corruption District Charsadda

CTC


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Annex M (37)



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services, Peshawar, and not to any official by name. E-Mail Address: DGHS@khyber.gov.pk
Warsak Road Peshawar

NO. B303-83/E-1

Dated: 27/5/2022

To

1. All District Health Officers in Health Department Khyber Pakhtunkhwa
2. All Medical Superintendents Health Department Khyber Pakhtunkhwa

Subject: UN-AUTHORIZED RELIEVING OF OFFICERS IN BPS-17 AND ABOVE

It has been noted with grave concern that various sub-offices especially DHOs and MSs in Health Department Khyber Pakhtunkhwa have been relieving officers in BPS-17 and above working under their administrative control and directing them to report to DGHS Khyber Pakhtunkhwa. On the one hand such un-authorized practice is against the delegation of administrative powers in Health Department but on the other hand it leads to administrative issues and sometimes adverse legal consequences.

It may be noted that relieving of an officer is in substance transfer of an officer outside your administrative control which the DHO and MS is not competent to order.

DHO/MS is the Appointing Authority for the post below BPS-16. You instead of relieving the officer/official to DGHS may take necessary/disciplinary action at your end. Referring service matters of such personnel not only causes inconvenience to the concerned employee but also increases work load on this office unnecessarily. Such practice creates misconceptions in the minds of employee whose cases are un-duly referred to this office.

You are hereby directed to refrain from such practice in future and where if so required for compelling reasons the matter must be referred to this office for appropriate orders with full justification instead of relieving the officer.

These instructions must be followed in letter & spirit to avoid any administrative & legal complications in future.

Director General Health Services
Khyber Pakhtunkhwa Peshawar

cc

Secretary to Govt. of Khyber Pakhtunkhwa Health Department (for information)

Annex (N)

38

Dairy No. 9718

Date. 17.6.22

Health Department

To,
The Secretary Health,
Khyber Pakhtunkhwa.

**SUBJECT: WORK PLACE HARRASEMENT, HUMILIATION,
ABUSIVE LANGUAGE, MISBEHAVIOUR AND MISUSE OF POWERS
BY MS DHQ HOSPITAL, CHARSADDA DR. JEHAZEB.**

Respected Sir,

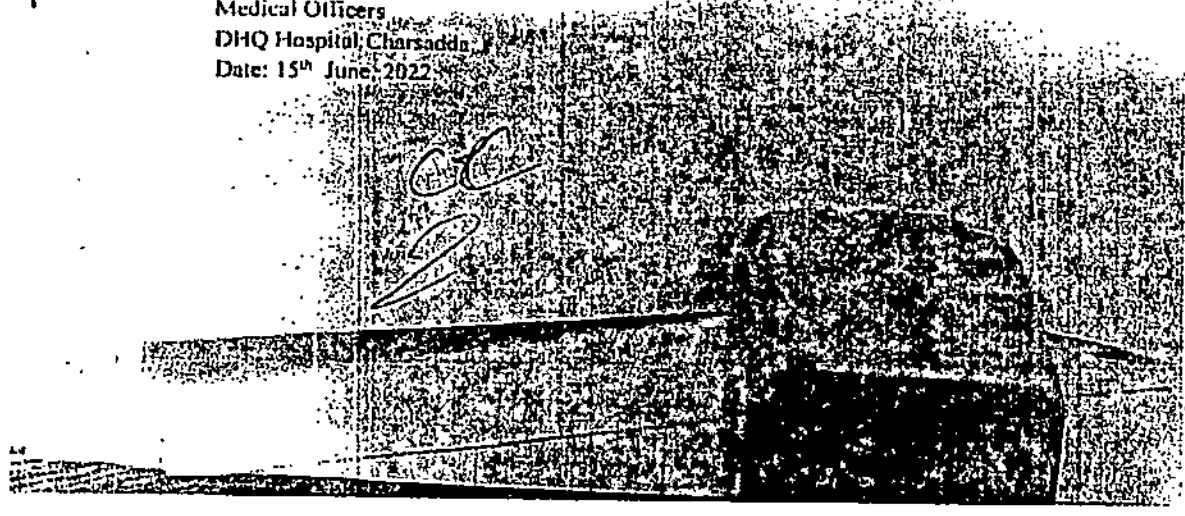
With due respect, it is stated that we all doctors of DHQ Hospital Charsadda are working hard to serve the ailing community of Charsadda although we belong to different areas of Khyber Pakhtunkhwa. On average basis, we are dealing at least 10 lac (1 million patients per year). This shows the dedications of doctors and other health staff in limited resources.

But the present hostile environment of DHQ Hospital Charsadda is not favorable for working due to the humiliating behaviour of Dr. Jehanzeb MS DHQ Hospital. He is involved in work place harassment, abusive language, misbehavior and misuse of powers towards Health Staff specially grade 17 Medical Officers. Many of our competent doctors including qualified Surgeons and Physicians have left this hospital due to his insulting and non professional behaviour. We all doctors tried our best to make a favorable working environment for both patients and doctors but failed due to his non human behaviour.

It is therefore requested, to either remove/change him from the present post in the best public interest or transfer all of us as this environment is neither good for doctors nor for proper patient care or we shall be left with no other choice but to withdraw our services in protest.

Names and signatures of Doctors attached.
We shall be very thankful for your kindness in this regard.

Yours Sincerely,
Medical Officers
DHQ Hospital, Charsadda.
Date: 15th June, 2022



To

The

SHO PS Charsadda

Subject: PHYSICAL TORTURE OF MINE.

39

FIR

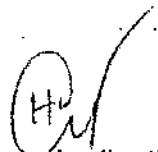
R/Sir

According to my previous reports to higher authorities against MS, DHQ CHARASADDA, the MS transfer me from unit to unit as a punishment because of my complaints to higher authorities and compels the unit Incharges to falsely report me in order to punish me and Blackmail me to higher authorities, so recently again dr Hamid Banori falsely reported me that I am regularly irregular and I was called an explanation. Due to car breakdown I came late and he tried to humiliate me and attacked me to physically torture me and asked the other ones to close the door and beat me.

Instead of physical torture he should take legal action and communicate the matter to higher authorities. Camera record of the physical attack is there.

Actually all these events are because of my grievances communication to higher authorities against MS. My physical torture is because of the MS plotting against me. MS is involved in the harassment of doctors. H wants to torture me mentally.

Thanks.


Yours obediently,
Dr Hameedullah
PMO DHQ, Charsadda.
Dated, 23-09 2022
Tim;9:35 AM.

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dated: 30-09-22
Health Deptt;

To

THE SECRETARY HEALTH KPK,

Subject; HARASSMENT/MISUSE OF POWERS BY THE MS

Nepotism/fraternity.

Respected Sir!

THE MS DHQ CHARSAADA has developed a torture cell through a fake system;

These doctors are his allies and has common interest with him through sehat card syste and illegally linked with sehat card. Being obliged by the MS they are involved in fake repoting ,especially those who are illegally linked.

DR ANJUM NISAR WMO BPS 17 adjusted against SENIOR DISTRICT CONSULTANT RADIOLOGIST BPS 19.

DR. ADIL SMO BPS 18 adjusted against district specialist BPS 18.

DR. HAMID HUSSAIN BANORI MO BPS 17 adjusted against senior district chest consultant BPS 19.

According to BUDGET BOOK 2022-2023 THERE IS NO BPS 18 DISTRICT RADIOLOGIST and DISTRICT CHEST SPECIALIST 18 POST IN RADIOLOGY and CHEST.

DR. ADIL SMO BPS 18 adjusted against BPS DISTRICT SPECIALIST.

DR ATEEQ MO BPS 17 adjusted against BPS DISTRICT NEPHROLOGIST.

DR. SHAHID IQBAL MO BPS 17 adjusted against BPS Gastroenterologist.

DR GHAZAN MO BPS 17 adjusted against BPS 19 SENIOR DISTT; PSYCHIATRIST.

DR. ALI MOHD is senior to DR MUHD BILAL BOTH BPS 19 but DR Muhd BILAL is incharge.

THERE IS ONE SENIOR DITRICT SPECIALIST POST IN DHQ CHARSAADA.

DR SHAKIRULLAH BPS 17 adjusted against BPS 18 DISTT; neuro surgeon.

Those doctors who have signed internal share distribution formula especially those who have been adjusted against work as a police force and forced by the MS TO REPORT THOSE DOCTORS who criticize either Sehat card system or threat to the secret financial system.

The adjusted doctors have become obliged and illegally linked to sehat card system and so obliged To MS and compelled and forced by MS to report fakely.

Furthermore it is pertinent to mention that ADIL ENT SURGEON ABOVE IS JUNIOR TO DR JAVAID IQBAL ENT SURGEON.

DR ZAHIRULLAH CHEST SPECIALIST possesses FCPS degree versus DR. hamid Hussain banori who possesses MCPS degree but DR .HAMID HUSSAIN BANORI IS INCHARGE OF THE CHEST UNIT and so on what basis??.

According to ANJUM NISAR DR ADIL ENT INCHARGE and DR. HAMID BANORI THEY are compelled to report me to MS through fake charges so that MS may find some excuse to punish and blackmail me in the eyes of the government for why I complained against MS in written form to KPK HEALTH DEPARTMENT for the misuse of powers and harassment of me and other doctors.

CPC
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The following doctors were relieved by MS through misuse of powers. Their relieving was out of MS jurisdiction powers but he did and they suffered;


I remember the following relieved doctors DR, SAID MOHD PHYSICIAN; DR JAVAIDUR REHMAMN CARDIOLOGIST, DR AMEEN KHATTACK PAEDS, DR SHAM's orthopedic surgeon, DR. ASHFAQ MO, DR MARIA WOMAN MEDICAL OFFICER and so many OTHER doctors besides lower staff were relieved by you unjustly. Dr. SHAHID AYUB WAS GIVEN REMEDY BY THE COURT.

I know the following doctors from whom unjust salaries were deducted illegally;

DR KHADJA WMO, DR. DOST MOH EX MO, NOW IN MAULAVI G HOSPITAL, DR KASHIF SURGICAL UNIT, skin MO MO DR NASIR and many other doctors whom I do not know.

I am also subject to that harassment both directly and indirectly through fake reports.

Thanks.

Yours obediently,

DR HAMIDULLAH PMO,
DHQ CHARSAKDA.



GOVERNMENT OF
KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT



No. 50 (Secret) HD/1-5/2013
Dated: Pesh. the 15-01-2013.

562
22-1-13

499

To
The Director General,
Health Services,
Khyber Pakhtunkhwa,
Peshawar.



DDHO
N/A

42

Subject: APPLICATION FOR DISCIPLINARY ACTION AGAINST DOCTOR
JEHAN KUR CIVIL HOSPITAL AKORA KHATTAK.

I am directed to enclose herewith a copy of the complaint
lodged by people of Akora Khattak which is self explanatory on the
subject noted above, for further necessary action and report to this
Department at the earliest please.

Encl. As above.

[Signature]
Section Officer (Secret)

Encl. of even No. & date.

Copy of the above is forwarded to the PS to the Secretary
to Govt. of Khyber Pakhtunkhwa Health Department, Peshawar.

[Signature]
Section Officer (Secret)

OFFICE OF THE DEPUTY DIRECTOR, HEALTH SERVICES, KHYBER PAKHTUNKHWA PESHAWAR.

No. 3162-69 / P.S.I. Dated Pesh. the 04/02/2013.

Copy of the above along with its enclosures is forwarded to:-
01. DHD, Nowshera for information with the remarks to conduct a fact
finding enquiry and submit a comprehensive report to this Directorate
for onward submission to the Government.

02. AS-II, DGHS Office Peshawar for information.

ASSISTANT DIRECTOR (P.S.I.)
OFFICE OF PESHAWAR.

G.C. Secretary to Govt. of Khyber Pakhtunkhwa Peshawar for information.

D No. 101
Pesh. 18/1/2013
Section AD (P.S.I.)
AGT, OHS, KPW



CTC

(43)

- 1- چیف بیکری خیر بختو خواہ
- 2- سیکریٹری ایجوکیشن خیر بختو خواہ
- 3- سیکریٹری ایجوکیشن خیر بختو خواہ
- 4- ایڈیشنل سیکریٹری ایجوکیشن ڈیپٹمنٹ خیر بختو خواہ
- 5- ڈائریکٹر جنرل ایجوکیشن خیر بختو خواہ
- 6- ڈائریکٹر ایجوکیشن ڈیپٹمنٹ خیر بختو خواہ
- 7- ڈائریکٹر ایجوکیشن ڈیپٹمنٹ خیر بختو خواہ
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- 13- ڈائریکٹر ایجوکیشن ڈیپٹمنٹ خیر بختو خواہ
- 14- ڈائریکٹر ایجوکیشن ڈیپٹمنٹ خیر بختو خواہ
- 15- ڈائریکٹر ایجوکیشن ڈیپٹمنٹ خیر بختو خواہ
- 16- ڈائریکٹر ایجوکیشن ڈیپٹمنٹ خیر بختو خواہ

ہم ایم ایچ اے اے کے ذریعہ آپ حضرات کی خدمت میں چند اہم گزارشات رکھ رہے ہیں جو کہ حقیقت پر مبنی ہے۔

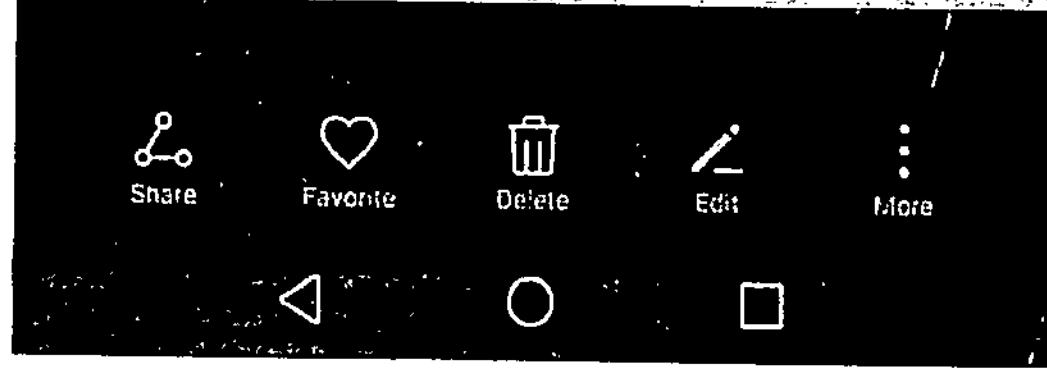
1- ہمارے سول ہسپتال کوڑھنگ میں ایک ڈاکٹر جہازیب خان ولدنا حسن انڈرمان سکے صوبائی ہیلتھ سروس کا انگریز تھا یہ شخص انتہائی بددیانت، بدکردار شخص ہے جو کہ معاشرے میں ایک نامور اور ننگ کا ٹھکانہ ہے۔

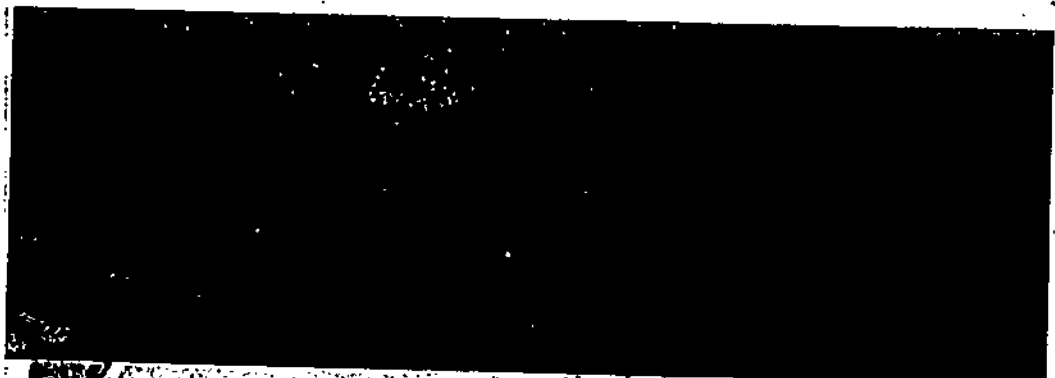
جناب عالی! جب تک یہاں ہسپتال میں رہا ہے وہ تو انڈیا کی ایک سرکاری ہسپتال کی سرکاری الاؤنس کی گارنٹی دینے اور تم خزانے میں خرچ کرنے کے بجائے کھالینے اس کے علاوہ ملائی اسٹورٹ میں بھی اس پر ننگ خرچہ کرنا لازم ہے۔

اگر وہ ننگ کے تمام مشین ایم ایچ اے کے ملائی اسے اس بات کے گواہ ہے کہ یہ بدکردار شخص ہسپتال میں عورتوں سے بدتمیزی کرتا تھا۔ لہذا اسے ہسپتال سے ہٹا دیا جائے۔ اس بات کا گواہ ہے اس سلسلے میں یہاں پر DHO نوشہرہ کی طرف سے ان گزارشات پر کالی انکوائری ہو چکی ہے۔ جو کہ کارروائی ہے۔

- 2- جناب عالی اس ڈاکٹر کا رورڈ کی لین جہاں بھی اس نے ڈیوٹی کی ہے اس کو وہاں سے جبراً ہٹایا جائے۔ جس میں چھٹی ہسپتال بندر جڈل ہے۔
- 1- DHO پٹن سلس
- 2- BHU کی پٹن
- 3- ڈیپٹی ڈائریکٹر ہسپتال پٹن
- 4- RHC ڈاکٹر ایجوکیشن
- 5- DHO آفس صوبائی ایجوکیشن ڈیپٹمنٹ

(Handwritten signature)





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See/18



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services, Peshawar and not to any other office.

No. 2072-11 /CC/2664/2014

Dated 15/10/2014

To

The Secretary to Government of Khyber Pakhtunkhwa
Health Department Peshawar.

SUBJECT: COMPLAINT AGAINST DR. JEHANZEB DAG (EMAIL KHTL)

Dear Sir,

I am directed to refer to the subject noted above and to submit an enquiry report alongwith its enclosures received from Deputy District Health Officer Peshawar vide letter No. 9452/District Health Officer (Pesh) dated 08-09-2014, with the remarks that this Directorate agrees with findings of the enquiry report, for onward submission to Section Officer-II(CARC) Chief Minister's Secretariat, Khyber Pakhtunkhwa Peshawar.

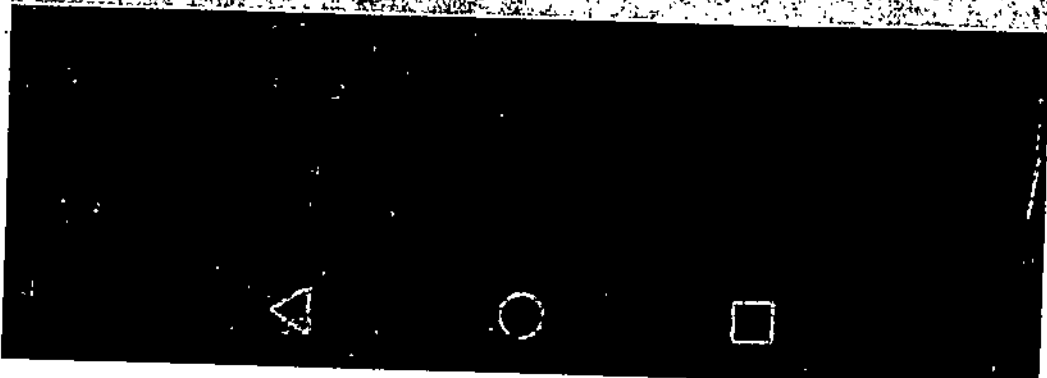
[Signature]
Assistant Director (P-II)
DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

13/10/14

CC

1. Copy alongwith a copy of its enclosures is forwarded to the Section Officer-II(CARC) Chief Minister's Secretariat, KPE w/r to his letter No. 9452/CARC/13/5/2014/APP/266S dated 25/09/2014

2. Copy alongwith a copy of its enclosures is forwarded to the District Health Officer, Peshawar with the request to issue warning to the mentioned official. *[Signature]*



17101-1604132-7/0333 5905250

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نام بیمار (10-03-03)

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع بست جرم قابل دست اندازی پس رپورٹ شدہ زیر نمبر 102 نمبر مطابق عدالتی

تاریخ	13	تاریخ	22-02-22
وقت	15:30	وقت	22:00
نمبر	518	نمبر	1640

رہائش گاہ	راکھڑی
پتہ	لکھنؤ، قلم فروش خان، سیکٹر 1، سٹیٹ ٹی اے سی

پتہ	72506, 504, 342
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رہائش گاہ	MS وومن اینڈ چیلڈرن ہسپتال راج پورہ
-----------	-------------------------------------

رہائش گاہ	MS ڈاکٹر محمد حیات ریسٹ ہنٹ DHQ Wachi
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رہائش گاہ	مدنی کے دروازے پر مقررہ ٹی اے سی کا علاج
-----------	--

ابتدائی اطلاع کے درج کردہ
 دروازے پر مقررہ ٹی اے سی کے علاج کے تحت
 مدنی کے دروازے پر مقررہ ٹی اے سی کے علاج کے تحت
 کئی روزوں سے یہ حالت برقرار ہے
 اس کے علاوہ اس کے درمیان میں کئی اور مسائل ہیں
 جن سے اس کی حالت ابتر ہو رہی ہے
 اس لیے اس کے علاج کے لیے اس ہسپتال کے
 ڈاکٹر محمد حیات سے مشورہ کیا گیا ہے
 ان کے علاج کے لیے اس ہسپتال کے
 ڈاکٹر محمد حیات سے مشورہ کیا گیا ہے
 ان کے علاج کے لیے اس ہسپتال کے
 ڈاکٹر محمد حیات سے مشورہ کیا گیا ہے
 ان کے علاج کے لیے اس ہسپتال کے
 ڈاکٹر محمد حیات سے مشورہ کیا گیا ہے
 ان کے علاج کے لیے اس ہسپتال کے
 ڈاکٹر محمد حیات سے مشورہ کیا گیا ہے
 ان کے علاج کے لیے اس ہسپتال کے
 ڈاکٹر محمد حیات سے مشورہ کیا گیا ہے

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 17101-1604132-7/0333 5905250

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**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to The Director General
Health Services Peshawar and not to any official by name.
Office Ph. (091) - 9210233 Peshawar. F. (091) - 9210187, 091 - 9210180 Fax. (091) - 9210129

No. 8193 / E-1
Dated 29 / 03 / 2013

To

Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department, Peshawar.

Subject: - APPLICATION FOR DISCIPLINARY ACTION AGAINST DOCTOR
JEHAN ZEB CIVIL HOSPITAL, AKORA KHATTAK.

Dear Sir,

In order to comply with the order of the Govt. contained in
letter No 80 (Secret) HD/1-S/2013 dated 15.01.2013, this Directorate
asked DHO Nowshera to conduct a fact finding inquiry against the subject
doctor and submit a comprehensive report, vide this Directorate letter No.
3062-64/E.1 dated 04.02.2013.

The enquiry officer has recommended that Dr. Jehan Zeb Khan
M.O. CH Akora Khattak may be transferred from the present post.

A copy of his report is enclosed herewith with the remarks that
this Directorate agrees with the remarks of the enquiry officer.

Yours faithfully,

[Signature] 29/3/13
DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

[Handwritten initials]

[Handwritten initials]

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1158/16/2

Annexure A

GOVERNOR'S SECRETARIAT N.W.F.P.
PESHAWAR



SECRETARY

233
5-5-00

No. 50-2/111/16/47-50/w
3rd May 2000

- 1- Chief Secretary, NWFP.
- 2- Secretary Health Department, NWFP.
- ✓ 3- Chairman, Provl. Inspection Team, NWFP.

Subject: REPORT AGAINST DOCTOR JEHAZEB DISTRICT SWABI

Enclosed please find a copy of letter No. 609/07 12-1, Govt dated 27th April, 2000 on the subject noted above. The Governor NWFP has passed the following orders on the letter:-

file on file

- "1. Suspend him.
- 2. PIT to investigate and report by 15th May."

You are requested to take further necessary action accordingly.

(SHTIAK AHMAD KHAN)
Secretary to Governor

Encl: No. & date of issue

Copy forwarded to Lt. Col. Muhammad Aslam, Officer Incharge, Provincial Monitoring and Coordination Section (Coordination Section) Care of Headquarters, Number 10, Camp Peshawar Cantonment, for information with reference to the mentioned letter.

CTC

Secretary to Governor

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WAKALATNAMA

BEFORE THE HONBLE

KP Service

Tribunal Peshawar

Dr. Ali Muhammad

Plaintiff(s)
Petitioner(s)
Complainant(s)

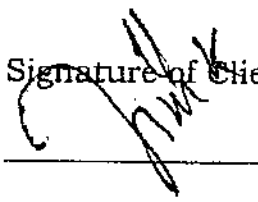
VERSUS

MS DHO Charsadda

Defendant(s)
Respondent(s)
Accused(s)

By this, power-of-attorney I/we the said Appellee in the above case, do hereby constitute and appoint **MUHAMMAD ARIF JAN** Advocate as my attorney for me/us in my/our name and on my/our behalf to appear, plead, give statement, verify, administer oath and do all lawful act and things in connection with the said case on my/our behalf or with the execution of any decree or order passed in the case in my/our favour/ against which I/we shall be entitled or permitted to do myself/ourselves, and, in particular, shall be entitled to withdraw or compromise the case or refer it to arbitration or to agree to abide by the special oath of any person and to withdraw and receive documents and money from the Court or the opposite party and to sign proper receipts and discharges for the same and to engage and appoint any other pleader or pay him as his fee irrespective of my/our success or failure in case, provided that, if the case is heard at anyplace other than the usual place of sitting of the Court the pleader shall not bound to attend except on my agreeing to pay him a special fee to be settled between us.

Signature of Client



Accepted



Muhammad Arif Jan
Advocate High Court
Peshawar

Office No.210, Mumtaz Plaza
G.T Road, Hashtnagri Stop,
Peshawar City.
CNIC No.17201-2275748-7
Bc No.10-6663
Cell: 0333-2212213