

The Director General Health Services  
Ministry of Health, Government of Punjab

*Annexure D*

**DEPARTMENTAL APPEAL AGAINST THE ORDER OF DHO BUNER**

RECEIVED AT DHO BUNER

With great pleasure and honor to state that we have been transferred by the DHO Buner via Office Order bearing Encl. No. 8246-50 dated 04/10/2018 to BHU District Buner and CD Amir Nawaz District Buner (copy attached) on the directions of Deputy Commissioner Buner.

It is further stated that I, Dr. Nadar Khan BS-17 and Mr. Amir Nawaz MT BS-14 are the employees of Provincial Health Department and DHO Buner and DC Buner are not authorized for our transfer.

Therefore, requested from your good self that the said orders i.e. transfer of Dr. Nadar Khan BS-17 and Mr. Amir Nawaz MT BS-14 may kindly be cancelled being illegal.

Thanking you anticipation sir

Yours Obediently,

*[Handwritten signature]*

Dr. Nadar Khan MD in Charge BS-17  
BHU Gagra (Buner)

Mr. Amir Nawaz PHC Tech L IIP BS-14  
BHU Gagra (Buner)

BC  
District Health Officer Buner

*DHO Buner*  
*In what capacity you had been transferred BS-17? you should have referred the case to DC/Bunel Health?*

*28/10/2018*  
Director General  
Health Services  
Ministry of Health, Government of Punjab





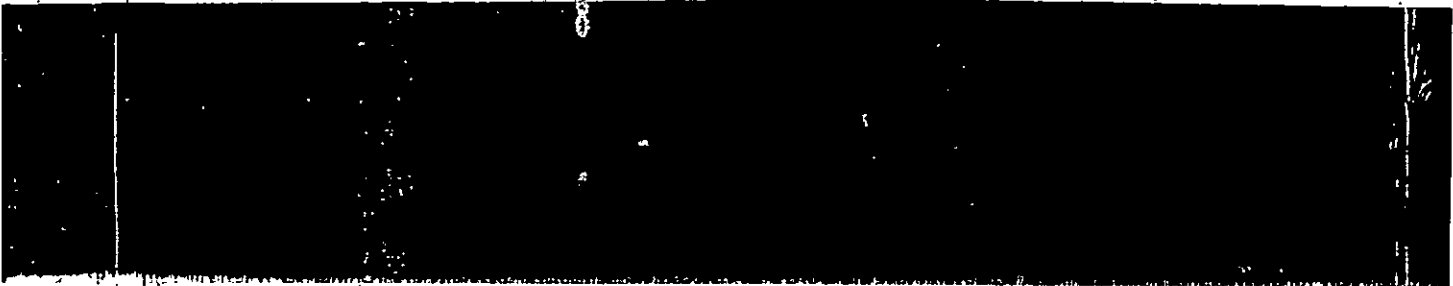
Handwritten notes and signatures at the top left of the page.

April 2019

ATTENDANCE ROLL FOR MONTH OF

April

Attendance roll table with columns for Name, days 1-31, Total Late (Current month, To end of current month), and Casual L (Current month). Rows include names like Dr. Nadeer Khan, Mr. Anwar Nadeem, Mr. Ali Rahman, etc.



5206

MAY 2018

May

ATTENDANCE ROLL FOR MONTH OF

Name																																Total Late							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current month	To end of current month.	Current month					
Dr. Nadat Khan M/o 1/2																																							
Amir Nawaz (SMT)																																							
Mr. Ali Rahman (M. Tech)																																							
Mr. Umar Zub (Edi Tech)																																							
Mr. Kramul haq (Edi Tech)																																							
Basdar Shuh (Edi Tech)																																							
Mr. Momin Khan (Bister)																																							
Mr. Muhammad Iqbal (W. Idris)																																							
Mr. Qamrui Khan (Chaukelay)																																							
Mr. Hamid Khan M.T																																							
Misc. Musilama Dob.																																							

(208)

June 2019

ATTENDANCE ROLL FOR MONTH OF.....

JUNE

No.	Name																															Total Late		Cas					
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current month	To end of current month	Current month				
1)	Dr. Nadan Khan Mla 1/c	NIK	NIK								NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK	NIK						
2)	Amir Nawaz SMT	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP					
3)	Mr. Umar Zeb Epi tech	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP					
4)	Mr. Iqbal Hussain Epi tech	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP				
5)	Baidar Shah Epi tech	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP				
6)	Mr. Momin Khan (Bisleri)	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP				
7)	Mr. Muhammad Liaqat (Wiredala)	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP			
8)	Mr. Ramzan Khan (Chamberlain)	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP			
9)	Mr. Hamid Khan M.T	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP			
10)	Miss Muslima (Dab)	PP	PP								PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP			

July 2019

جولائی

July

1630/2019

ATTENDANCE ROLL FOR TENTH OF

I, W.F.P. Routine No. \_\_\_\_\_

No.	Name																																Total Late					
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current month	To end of current month				
1)	Dr. Nadir Khan MLO Kc																																					
2)	Amir Nawaz SMT																																					
3)	Mr. Umar Zeb Epi tech																																					
4)	Ikram ul Haq Epi tech																																					
5)	Baidat Shah Epi tech																																					
6)	Mr. Momin Khan (Bister)																																					
7)	Mr. Muhammad Inam (Wardali)																																					
8)	Mr. Dawood Khan (Chawkehal)																																					
9)	Mr. Hamsah Khan (MT)																																					
10)	Miss Muslima (Dab)																																					
11)	Ghulam Razvi (MT)																																					





**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.**

Service Appeal No 1121/2019

Hamsher Khan.....Appellant.

**VERSUS**

DG & Others.....Respondents

**AFFIDAVIT**

I, *Dr. Mohd Yousaf* do hereby solemnly affirm and declare on oath that the contents of accompanying **Reply** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

*M Faisal*

**DEPONENT**

*Litigation officer  
DHO, Buner, KPK*

GOVERNMENT OF KHYBER PAKHTUNKHAWA  
OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER  
EMAIL:DHOBUNER@GMAIL.COM. PHONE & FAX:0939-510138

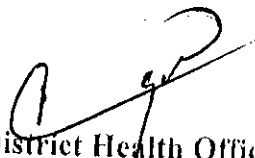


No: 3034 - /Courtfile

Dated: 05 / 09 / 2019.

OFFICE ORDER

Dr. Muhammad Younas Faisal Medical Officer BPS-17 attached to BHU Koga is hereby authorized to attend the all kind of court cases.

  
Deputy District Health Officer  
GMK Buner

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1121 OF 2019

Hamsher Khan.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary Objections:-

1. That the Appellant has got neither cause of action nor locus standi to file the instant Appeal.
2. That the Appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant Appeal is against the prevailing Law and Rules.
4. That the Appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the Appellant has filed the instant Appeal with mala-fide intention hence liable to be dismissed.
6. That the Appellant has not come to the Tribunal with clean hands.
7. That the Appeal is time barred.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
9. That the instant Appeal is bad for mis-joinder and non-joinder of the necessary parties.
10. That the Appellant is estopped by his own conduct to bring <sup>the</sup> instant Appeal.

ON FACTS:

1. Para No 1 pertains to record, hence no comments, however it is added that the Appellant was transferred from BHU Gagra to BHU Charorai on 16-07-2015 and relieved on the same day as a consequence to inquiry conducted upon the complaint of the then Medical Officer who had complained about the

- misbehavior, disobedience besides threatening him of dire consequences, however he neither complied the order nor reported arrival at BHU Charorai. The malafide of the Appellant is proved from the fact that upon exerting political pressure and under the garb of General duty order of Deputy Commissioner besides in connivance with the Accounts Staff coupled with keeping in dark the Medical Superintendent the Appellant manvoured to receive salary from BHU Gagra but he fraudulently included his name in the attendance register but without any arrival report. (Copy of Order dated 16-07-2015 & Relieving slip is enclosed as Annexure A & B).
2. Para No 2 is incorrect as the Appellant always misbehaved with his colleagues, staff members and even his Medical Superintendents besides remaining absent from duty and then exerted pressure upon them through means other than fair and legal. On these score many times his explanations were called, also proceeded against and even warned time and again. (Copy of Orders, Explanations, Warning letters & inquiries are enclosed as Annexure C).
  3. Para No 3 as reproduced is incorrect hence denied, the Appellant has tried to mislead this Honorable Tribunal as before the withdrawal of General duty order by the Deputy Commissioner the Appellant was posted at BHU Chraorai so after the withdrawal of the General duty order all concerned were sent back to their place of posting, so the Appellant was required to report to BHU Chraorai but he malafidely showed his place of posting at BHU Gagra, so respondents did not accept his arrival at BHU Gagra.
  4. Para No. 4 under reply is correct to the extent of application for inquiry submitted to the Deputy Commissioner which was not the proper authority however after conducting inquiry in the matter the facts unearthed and the Appellant was transferred to BHU Torwarsak vide impugned order.
  5. Para No. 5 detailed reply has already been submitted in preceding paras.
  6. Para No. 6 detailed reply has already been submitted in preceding paras.
  7. Para No 7 as reproduced is incorrect, respondents always perform their duties as per law and rules however Appellant is not ready to perform duty at the place of his posting, moreover he has not filed proper appeal.

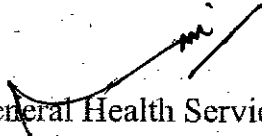
**ON GROUNDS:**


- A. Para-A is incorrect. The impugned order is according to law and rules.
- B. Para-B as already replied in preceding paras. The order is legal and no right of the Appellant has been violated.
- C. In reply to Para-C it is submitted that as per Section 10 of the Khyber Pakhtunkhwa Civil Servants Act 1973, the Appellant is liable to serve anywhere and there is no ill will or malafide on part of the replying respondents.
- D. Para-D as already replied in preceding paras. Furthermore the Appellant served at BHU Gagra for about 20 years and even by now has not reported arrival at his new place of posting.
- E. Para-E detailed reply has already been given in the preceding paras, however the Appellant has been treated according to law and rules.

- F. Para-F as already replied in the preceding paras that no fundamental rights of the Appellant are violated.
- G. Para-G is incorrect. The impugned order is according to law and rules and legal action has been ordered in subsequent to inquiry.
- H. In reply to Para-H it is submitted that the respondents seek leave to raise additional grounds at the time of arguments.
- I. Para-I needs no reply being legal.

**PRAYER:**

It is therefore humbly prayed that on acceptance of the comments, the instant Appeal may very graciously be dismissed with cost.

  
Director General Health Services,  
Khyber Pakhtunkhwa.  
**Respondent No. 01**

  
District Health Officer Buner.  
**Respondent No. 02**

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

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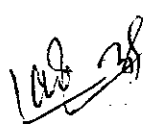
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Director General Health Services,  
Khyber Pakhtunkhwa.  
Respondent No. 01

  
District Health Officer Buner.  
Respondent No. 02



From,

1. Dr. Abdul Wahid CDC Coordinator (inquiry officer)
2. Dr. Lal Bacha EPI Coordinator (inquiry officer)

To,

The District Health officer  
District Buner


Subject: -

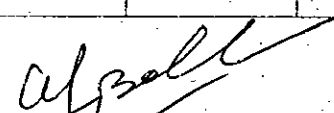
**INQUIRY REPORT AGAINST DR.SAEED-UR-REHMAN  
&MR.HAMSHER MT BHU GAGAR**

R/sir,

The inquiry report conducting of 03 pages is hereby submitted along with all enclosures (copy attached) as listed below

S#	Detail	Pages	Page no.	Annexures
1	Inquiry report	03 pages	01-03	A
2	Letter from DHO to inquiry officer	01 page	4	B
3	Application of Dr,Saeed-ur-rehman to DHO & Team Leader Merlin	02 pages	5-6	C
4	Reply of Mr Hamsher	04 pages	7-10	D
5	Repy of Mr. Hamsher (2 <sup>nd</sup> reply)	03 pages	11-13	E
6	Attendance resistor photocopy	06 pages	14-19	F
7	Statement of Dr,Saeed-ur-rehman	02 pages	20-21	G
8	Statement of LIIV (nizakat)	02 pages	22-23	H
9	Statement of Amir-Nawaz MT	02 pages	24-25	I
10	Statement of Ali Rehman MT	02 pages	26-27	J
11	Statement of Mr.Siraj W/orderly	02 pages	28-29	K
12	Statement of Mr.Saeedullah Sweeper	02 pages	30-31	L
13	Statement of Mr.Momin chowkidar	02 pages	32-33	M
14	Statement of Mr.Said Mukhtyar shah	02 pages	34-35	N
15	Questionnaire from Dr.Saeed-ur-rehman	02 pages	36-37	O
16	Questionnaire from MT.hamsher	02 pages	38-39	P

  
Dr. Abdul Wahid CDC  
Coordinator (inquiry officer)

  
Dr. Lal Bacha EPI  
Coordinator (inquiry officer)

Amir

①

To

The District Health Officer Buner,

Subject; ENQUIRY AGAINST HAMSHER MT BHU GAGRA

Ref ; your office letter no 4197 - 4202 dated 15-6-2015

R/Sir,

The following staff interviewed and statements recorded.

1-Dr Saeedur Rehman I/C MO, 2- Miss Nizakat LHV 3- MR Amir Nawaz SMT, 4- MR Ali Rahman MT, 5- Momin Khan Chowkidar, 6- Hamsher MT, 7- Siraj mohammad Ward Orderly 8- Saedullah sweeper 9- Mukhtiar Shah EPI Tech

**Findings;**

1-MO I/C stressed on his complaint and told that in this upset situation it was not possible for him to run the routine activities of his BHU and requested for early action against MT.

2- Nizakat LHV(female trainer to LHWS) told in her statements that the MO complaint was true and she further stated that Hamshir had introduced himself as final authority to LHWS in their service affairs and hence been black mailing them.

3 – Amir Nawaz SMT declares the present behavior of Hamshir MT in this case, as an attack on the designation and personality of Dr Saeedur Rehman, he also supported the complaint launched against Hamshir MT. He further stated that such incidence was not a new thing in dealing with female Staff.

4-,Ali Rehman MT( male trainer to LHW at present) cleared that threats were given to him, when he was nominated as male trainer to LHWS by the MO I/C ,he also stated that Hamshir MT was black mailing/ abusing LHWS , that they will be terminated if they

7-Hamshir refused to accept all the charges launched against him as it was declared observation by the MO I/C.

8-Hamshir told that he had handed over LHW training to Ali Rehman and so he was obedient to MO I/C directive.

09 -In the statement Hamshir declare himself a Muslim pushtoon who could not indulged in any such action and refused allegations regarding abuse female/LHW.

10 -Hamshir accepted that he had given threat of FIR to MO I/C as counteraction of his threat to me.

11-Hamshir stated that press conference was his right but why the MO afraid if he was clear.

12- Hamshir also said that why MO not reported my act earlier.

13. In questioner by Inquiry Team, reply of Doctor I/C of the Facility, that he has neither called any explanation nor has submitted any letter about this matter against MT before.

14. Nomination of Mr.Ali Rehman MT to be trainer to the newly LHW Programm is the decision of MO I.C not the decision of Coordinator NP Buner.

15. M.T insist that the charges blame by the doctor I/C should be proved by the Doctor I/C properly.

#### Conclusion"

1. Statements of the whole staff is sufficient evidence, in the favour of Dr. I/C statement .
2. Two statement of the MT at different occasion is full of reluctance and then request, acceptance and then refusal and then respect and then blames, thus confusing in every aspect and having no solid or conclusive narrative.
3. MT Hamshir willfully admitted that the two complaints out of four launched against him

blamed on MT by I/C. for which the Dr. I/C says that Mr. Ali Rehman is the witness of the situation. While MT Hamsher insist that Miss-conduct & Miss-behavior should be proved by doctor properly.

9. The I.C has not called any explanation from the MT hamsher before in any matter neither in this matter nor has informed the DHO Office Buner.
10. Statement of doctor & MT reveal, that there is some miss understanding on teaching matter to LHWs among Doctors & MT. for which the resolution & opinion of LHW coordinator is must.


**Recommendation ;**

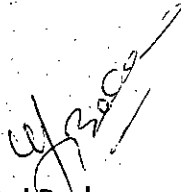
1. The LHW Coordinator NP ought not to give the responsibilities of teaching to LHW by Mr. Hamsher in this facility & other MT without permission of DHO & LHW coordinator.
2. It seems to be difficult for I/C Dr, Saeed-ur-Rehman & Mr. Hamsher MT BHU Gagra to work together in the same H/Facility, it is better to transfer both or any one of them for the smooth running of the H/Facility.

OR

Any decision by the competent authority DHO Buner will be appreciated in this regard.

Enquiry officers.

  
Dr Abdul Wahid  
CDC Coordinator  
DHO Office Buner

  
Dr Lal Bacha  
Coordinatot EPI  
DHO Office Buner

Annexure A

(5)

(1)

Office of the MO/IC BHU Gagra distt Buner.

To,

District Health Officer Buner.  
Team leader Merlin Buner.

Subject, Request for disciplinary action on Bad conduct, misbehave, disobedience and threats of MT Hamsher of BHU Gagra district Buner . .

Sir,

It is to state that the above subjected official was found involved in some suspicious activities of bad conduct since long, evident by my own daily observation, community complaint and repeated verbal reports of BHU staff, which cannot be explained at this level due to some traditional reasons of deserved and religious community.

Being MO/IC the said above official was called and advised sympathetically at my office in privacy and in detail with the evidences in my knowledge, he was advised to leave up these bad conduct and unaffordable activities/behavior.

But in response of the above proper correspondence what he did is that, he went out of control and replied as a mad person and threaten me as follows,

- "I will do everything which I would like and no one can forbid me and cannot change my present working position and I know each thing what is good and what is bad.
- I will blame you in community that you are abusing me to provide some female to you.
- I will hurt myself for getting self induced fracture of bone and will register FIR in police department against you.
- I will arrange a press conference and will blame your involvement in sexual harassment.
- I will create law and order situation in the BHU and will not allow you to perform your duties "

It is further added that during talking his language was extremely harsh and his body language was full of terror, which shows the severity of the matter.

Respected Sir,

It was too shocking for me as I was in sympathy with him and such a reaction was out of my expectation from him and which cleared my mind further to the root cause of his involvement and his bad conduct.

Refusal from changing his present working position (as trainer to Lady Health Workers) is another evidence of his concerns. Further detail is not good as I have mentioned above.

Being a responsible head of BHU so for I could handle my staff I did it to some extent but still facing some difficulties because of the behavior he made, which is not forgettable for me, and action and reaction could be repeated any time and my counter action may also be consider in future.

It is therefore requested in the light of above statement that disciplinary action may please be taken against Mr Hamshir MT of BHU Gagra , which in my opinion may be his immediate transfer so that I can run the routine activities of my institute (LHWs program, EPI and OPD) freely and smoothly in the best interest of public services and may please be followed by his suspension order, enquiry and charge sheet, He may be charge sheeted for the following,

1. **Bad conduct on his loose character** evident by me, the community and staff of BHU Gagra.
2. **Misbehave** on his harsh speaking and terroristic body language.
3. **Disobedience** on refusing to change his working position in BHU.
4. Threats as discussed above.

I hope that this request may please be honored as serious public issue but not as my Personal conflict, and it is first attempt to report my subordinate to the higher authorities For disciplinary action, but the behavior of the above official compelled me to do so.

Copy to --

- Director General health services KPK Peshawar for information and necessary action please.
- Deputy Commissioner Buner for information and necessary action please.
- District Police Officer Buner for information and with the request to watch the activities of Hamshir medical technician of BHU Gagra Buner to avoid any violence in future please.

Your sincerely .

Dr. Saedur Rahman  
Medical Officer Basic Health unit  
Gagra Buner 29/05/2015

OFFICE OF THE  
DISTRICT MAGISTRATE/  
DEPUTY COMMISSIONER,  
BUNER.

No:DC(B)/AG-III(H) 10179  
Dated: 01-06-2015.

To  
The District Health Officer  
Buner.

Sub: REQUEST FOR DISCIPLINARY ACTION ON BAD CONDUCT,  
MISBEHAVIOUR, DISOBEDIENCE AND THREATS OF MT  
HAMSHER OF BHU GAGRA DISTRICT BUNER.

Memo:

Reference a letter submitted by one Dr. Saedur Rahman Medical Officer Basic Health Unit Gagra, Buner against MT Hamsher of BHU Gagra, District Buner, on the subject noted above.

In this context, it is requested to conduct an impartial inquiry and take immediate action under intimation to this Office.

DEPUTY COMMISSIONER  
BUNER

Action has already  
taken against him the teacher  
the rules.

11/6/15  
Dist: Buner

OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER

No. 4197-4202 / 1

Dated Buner, the 15/06/2015



0939-510-138 | dhobuner@gmail.com | Fax-0939-510-138

OFFICE ORDER /conducting of enquiry

Reference this office No. 3081-83 dated 8-06-2015 is hereby withdrawn.

The following doctors attached to DHO office Buner will conduct the same inquiry, on the written request Mr. Hamsher Khan J/PHCT/Tech; MP BPS-09 attached to BHU Gagra (copy enclosed).

1. Dr. Abdul Wahid Coordinator CDC BPS-19
2. Dr. Lal Bacha Coordinator EPI BSP-17

They are hereby further directed to report to the undersigned within 03 days positively.

*[Signature]*  
District Health Officer

District Buner

15/06/2015

No. 4197-4202 / 129 <sup>file</sup> enquiry Dated

Copy to;

1. The above named Doctors
2. Mr. Hamsher J/PHC
3. P/file
4. Acctt;/Estab
5. P/file

*[Signature]*  
District Health officer

District Buner



OFFICE OF THE DISTRICT HEALTH OFFICER, DISTRICT BUNER

No. 3081-83 /

Dated Buner, the 8/06/2015

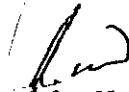
0939-510-138

dhobuner@gmail.com

Fax-0939-510-138

**OFFICE ORDER/ CONDUCTING INQUIRY**

1. Compliant against Mr.Hamsher J/PHC/Tech;MP BPS-09 attached to BHU Gagra, duly submitted by Dr.Saeed-ur-Rehman MO I/C BHU Gagra is enclosed.
2. Explanation letter called by this office from Mr.Hamsher vide this office No. 2938 dated 29/05/15 is enclosed.
3. Reply of the explanation in r/o Mr.Hamsher dated 03-06-2015 four pages are enclosed herewith, which all are self-explanatory. Dr.Amir Zahir SMO I/C CH Chamla & Dr.Lal Bacha Coordinator EPI, both are working in the Health Deptt; District Buner are hereby directed to conduct inquiry within a week & report to the undersigned for further n/action.

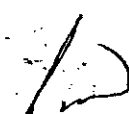
  
District Health officer  
District Buner  
/2015

No.

Dated

Copy to;

1. Dr.Amir Zahir CH Chamla
2. Dr.Lal Bacha Coordinator EPI
3. Acctt;/Estab
4. P/file

  
District Health officer  
District Buner

**OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER**

Phone & Fax # 0939-510138, Email: dhobuner@gmail.com

No. 2789 / 1

Dated the 3 / 06 / 2015

To,

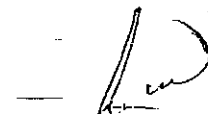
The Deputy Commissioner Buner  
District Buner

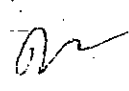
Subject:-

**REQUEST FOR DISCIPLINARY ACTION ON BAD CONDUCT  
MISBEHAVIOR, DISOBEDIENCE**

Memo,

Reference your letter No.DC(B)AG-III(H)10179 dated 01-06-2015, on the subject noted above. I have the honor to submit that action has already taken against Mr.Hamsher J/PHC/Tech;MPBPS-09 attached to BHU Gagra District Buner for information please.

  
District Health Officer  
Buner



Ames

From,

- 1. Dr. Abdul Wahid CDC BPS-19 inquiry officer
- 2. Dr. Lal Bacha EPI Coordinator. BPS-17 inquiry officer

Subject:-

STATEMENT/ QUESTIONNAIRE TAKEN FROM MO I/C DR.SAEED-UR-REHMAN BHU GAGRA

Memo,

Question No.1. Do you accept us as inquiry officer in the inquiry to be conducted on your complaint against the M.T Mr.Hamsher? (Copy attached)

yes

Question No.2. Is it right that the complaint submitted by you? (Copy attached)

yes

Question No.3. do you accept that the charges leveled by <sup>you</sup> against the M.T Mr.Hamsher are 4 in No..?

Question No.4 From what date the person under complaint is working under your supervision &/on the present post?

He is working for since long, But I observed him during newly recruited L.HUs train and remain under my complaint when 15-20 days passed of starting the train

Question no.5 Have you called any explanation from the person before this complaint in connection of such charges or any others charges?

No any explanation has been called  
But verbally advise has been given <sup>Two time</sup> for  
Correction his behavior.

Question.6. Have you informed the competent authority from such charges or any other charges labeled against the person before this? If any, submit to the inquiry officer.

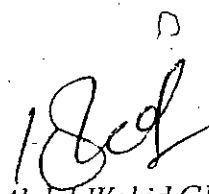
The district health officer has been informed verbally during his visit of this unit in month of May 2015, And written Complaint submitted on 29.5.2015.

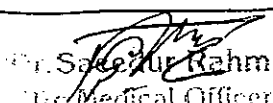
Question .7. Is this complaint submitted by you, sufficient or otherwise?

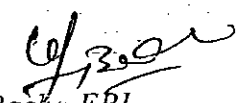
Yes it sufficient, But I can provide witnesses in behalf of his misbehavior and Misconduct of Mr. Howser

Question 8. Submit any relevant documents in the support of your complaint to the inquiry officers?

Yes, it is already submitted to you.

  
Dr. Abdul Wahid CDC  
BPS-19 inquiry officer

  
Dr. Saqibur Rahman  
The Medical Officer  
PHO Gagra Distt: Buner

  
Dr. Lal Bacha EPI  
Coordinator BPS-17 inquiry officer

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Correction his behavior.

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Yes, it is already submitted to you.

*[Signature]*

Dr. Abdul Wahid CDC  
BPS-19 inquiry officer

*[Signature]*  
Dr. Saadur Rahman  
Medical Officer  
PHO Gagra Distt: Buner

*[Signature]*

Dr. Lal Bacha EPI  
Coordinator BPS-17 inquiry officer

# انگلینڈ میں ہونے والے واقعات

بیان - عورتوں کا حق لینا اور ان کے حقوق کو بڑھانا۔

1 - 1848ء میں لندن میں ہونے والے واقعات، درمیان میں ہونے والے واقعات، لیبر پارٹی کی تشکیل اور اس کے مقاصد میں عورتوں کو شامل کرنا اور ان کے حقوق کو بڑھانا۔

2 - 1848ء میں لندن میں ہونے والے واقعات، لیبر پارٹی کی تشکیل اور اس کے مقاصد میں عورتوں کو شامل کرنا اور ان کے حقوق کو بڑھانا۔

3 - 1848ء میں لندن میں ہونے والے واقعات، لیبر پارٹی کی تشکیل اور اس کے مقاصد میں عورتوں کو شامل کرنا اور ان کے حقوق کو بڑھانا۔

2 - 1848ء میں لندن میں ہونے والے واقعات، لیبر پارٹی کی تشکیل اور اس کے مقاصد میں عورتوں کو شامل کرنا اور ان کے حقوق کو بڑھانا۔

اور 1848ء میں لندن میں ہونے والے واقعات، لیبر پارٹی کی تشکیل اور اس کے مقاصد میں عورتوں کو شامل کرنا اور ان کے حقوق کو بڑھانا۔

5 - یہ اصول کتب سے ظاہر تھا۔

8 - یہ تقریباً 2 یا 3 تین ماہ سے پہلے ہوئی تھی۔

5 - اس وقت میں پہلے لیبر پارٹی میں آئے تھے اور ان کے مقاصد میں عورتوں کو شامل کرنا اور ان کے حقوق کو بڑھانا۔

2 - اس وقت میں پہلے لیبر پارٹی میں آئے تھے اور ان کے مقاصد میں عورتوں کو شامل کرنا اور ان کے حقوق کو بڑھانا۔

یہ سب سے پہلے اس کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
موجودہ نگرانہ ہے اس لیے اس کے بارے میں جاننا ضروری ہے

1۔ ڈیوٹی کے بارے میں اس کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں ہے۔

2۔ دو H.W. کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
آگے کے صفحے کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
کا وقت کا ہے یا نہیں اور جو وقت ہے اس کے بارے میں جاننا ضروری ہے  
وقت کوئی اور بھی نہیں ہوتا تھا اس لیے اس کے بارے میں جاننا ضروری ہے  
اس کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
بچے سے 9 کے درمیان آتے ہیں اس وقت کے بارے میں جاننا ضروری ہے  
اگر یہ سب سے پہلے ہے۔

3۔ صفحہ کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
2۔ 0.5 کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک

س۔ صفحہ کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
دی ہے۔ FIR اور دیگر جاننا ضروری ہے کہ کیا یہ ایک

2۔ N کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
آگے ہے۔

صفحہ 60

دوسرے صفحہ 60 کو لکھنا

کیا یہ جاننا ضروری ہے

س۔ حضرت وائلہؓ کو یہ ایسا لفظ سن کر وہ ہلکا رہی

2۔ یہ حدیث میں ہے جو اللہ نے یہ بات حکیمانہ سے کہی

س۔ وائلہؓ کو یہ لفظ کہہ کر وہ ہلکا رہی اور اس نے

یہ کہہ کر وائلہؓ سے یہ حدیث میں بولتے

س۔ وائلہؓ کو یہ لفظ کہہ کر وہ ہلکا رہی

2۔ 668 تا الفقیہ در سندہ

سید اللہ

دستخط عبداللہ

سید

لانیہ یوٹاکٹر



بیان سعید الرحمن - سوتیر اور ریح و کاکڑ

۱۔ ڈاکٹر سعید الرحمن اور سعید عبدالرحمن، درساں  
عوتلسی سوچی اس بار میں آویسا جانے  
۲۔ صحیح یا جعلی ہے نہ وہ سوچی کے روز صحت میں صحت میں  
۱۱۱ اور ڈاکٹر صاحب اور سعید ڈاکٹر صاحب پر موجود صحیح تو ڈاکٹر صاحب  
۱۱۱ صحت میں کو کیا ہے آپ ۱۱۱ کو آیتہ شریفہ میں دیکھیں  
اور اس میں ڈیکھیں کہ کون سے صحت میں اور آیتہ شریفہ  
عکس رحمان ڈاکٹر صاحب

اس پر سعید صاحب نے خلاف اخلاق کیا کہ میں شریفہ میں  
دیکھا اور کون سے صحت میں آیتہ شریفہ میں دیکھا  
اس کا کون سے صحت میں صحیح اور علی عثمان دیکھا کو کون سے صحت میں  
صحت میں سے باہر نکالا ذکر دیکھیں سے اور یہیں دیکھیں  
۱۱۱ صحت میں اور ڈاکٹر صاحب سے آیتہ شریفہ میں دیکھیں  
صحت میں ڈاکٹر صاحب نہیں لکھتے صحیح تو صحت میں دیکھیں  
نکلیں سے لکھیں سعید صاحب کو یہ لکھنا کہ صحت میں  
۱۱۱ سعید صاحب الزام ہے کہ وہ صحت میں  
۱۱۱ صحت میں (۱) صحت میں (۲) صحت میں (۳) صحت میں (۴) صحت میں (۵) صحت میں (۶) صحت میں (۷) صحت میں (۸) صحت میں (۹) صحت میں (۱۰) صحت میں

سیرۃ النبیؐ پر ہیں۔ پھر اس کی بھی دھمکی دی تھی

2۔ اقول انہوں نے کہا کہ میں نے دھمکی دی تھی کہ تم لوگوں کو ہرگز نہیں

کھڑی کر دوں گا۔ یہ تھا ادر حجتی پر ہوا۔ لیکن میں غلطی سے کہہ

سکتا ہوں کہ انہوں نے میری طرف سے جو کچھ فرمایا اسے لوٹے ہیں

3۔ ہمیشہ سے یہ کہہ چکے ہیں کہ ہم نے تم سے جو کچھ مانگا اسے لوٹا ہے

الزام ہے کہ وہ انہوں کو صبح سویرے صحتی بلا تا تھا اور

کہتے ہیں کہ تم نے ان سے جو کچھ مانگا اسے لوٹا ہے

2۔ مجھے ان باتوں کا تفصیلاً علم نہیں ہے البتہ یہ باتیں وہ کہتے ہیں

جس سے زیادہ سزا ہے اور چونکہ یہ سزا ہے اس لیے اسے عمل و فعل سے

اس لیے ہمیشہ سے ان کا معاملہ رہتا ہے جس میں ہم نے اسے لوٹا

ہے۔ اس لیے ہمیشہ سے ان کا معاملہ رہتا ہے جس میں ہم نے اسے لوٹا

3۔ اس لیے ہمیشہ سے ان کا معاملہ رہتا ہے جس میں ہم نے اسے لوٹا

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میرن برطانو ہمسٹریڈ لٹل ٹیلیفونیشن لیمیٹڈ جو جاکر بوسٹر

بیان سراج خان طارق آرڈر

1۔ ڈاکٹر عبدالرحمان صاحب نے 24/10/40 کو بوسٹر کو درخواست دی ہے جس میں

برطانو ہمسٹریڈ لٹل ٹیلیفونیشن

کچھ شکایات ہیں کہ آپ کو اس بارے میں کچھ علم ہے

2۔ مجھے زبان ڈاکٹر صاحب نے راز داروں کے طور پر بتایا تھا کہ اس نے کئی بار

بوسٹر کو یہ شکایت کی ہے کہ ہمیشہ مجھے دھکیاں دے رہے ہیں اور برطانو لٹل

3۔ ہمسٹریڈ ڈاکٹر صاحب کو کس قسم کی دھمکی دی تھی؟

2۔ ڈاکٹر صاحب نے وقوعہ کے کچھ دن بعد اس وقت مجھے تفصیلی بیان

دیے ہیں اور باقی نزاکت 24/10/40 ڈاکٹر صاحب اور ہمسٹریڈ درمیان صلحہ رضائی کر

ڈاکٹر صاحب کے آفس گئے۔ ڈاکٹر صاحب نے ہمیں بتایا کہ میں کچھ دن بعد بوسٹر کو

کو پورے بات بتا دوں گا اگر بوسٹر کو لگوں گے مناسب سمجھا تو ہمیں کڑوں کا

پھر اگلے روز صبح 25/10 کو ڈاکٹر صاحب نے ہمیں بتایا کہ ہمسٹریڈ

یہ دھمکی دے رہے ہیں اس لیے اوپر لٹل ڈاکٹر صاحب کو لگوں گا اور اس کے خلاف

میں FIR کروا دوں گا اور جیلوں میں بیٹھا دے دوں گا کہ ڈاکٹر صاحب

مجھ سے مطالبہ کرتے تھے کہ مجھے لڑکیاں سیلائی کر دو میں نے انکار

کیا اور ڈاکٹر صاحب نے مجھ پر لٹل دیا۔ ان بالوں کو سن کر

یہ مناسب نہ سمجھا کہ ڈاکٹر صاحب کو صلحہ کر لیں اور بوسٹر کو

3۔ ہمسٹریڈ ڈاکٹر صاحب کے افہامات حالت سے انکار کیا تھا

ڈاکٹر صاحب نے ہمسٹریڈ کو بتایا کہ آپ کو خبر ہے کہ کوئی

صوبہ لٹل بوسٹر ہمسٹریڈ انٹرا جمیٹہ لٹل بوسٹر کو

بوسٹر کو لٹل بوسٹر میں لٹل بوسٹر دیتا رہے گا۔

بوسٹر کو لٹل بوسٹر میں لٹل بوسٹر دیتا رہے گا۔

۱ - ڈاکٹر صاحب نے اپنے بیان میں کیا ہے کہ آج تو مجھ پر دھم

۲ - تھی اس میں کتنی حقیقت ہے۔

جین صاحب سے مجھے شریک ماکھارے سے کھانے کو یا تو میں

دلچسپی نہیں آتی اگرچہ البیاض کی کوشش کی تو میں ابھی

تائیس گھوڑوں کا

۳ - آج ضال میں جمعیت پرانی اور بدستور کھل چکی ہے

۲ - اس میں میرا علم کا طالب آئی رہی غیر اطلاع سے سرگرمیاں

خارجہ کر کے لے کر آئے تھے یہ سب کچھ اور دلچسپی کی وجہ سے

محمد علی عثمان صاحب

جگا دستی - علی عثمان صاحب

تائیس گھوڑوں کا

• انکو اینٹرو بائیٹ صحیح حد تک لکھ کر نیٹس کی ایچ لوگا کر

بیان علی اصحاب - OPNE کیسٹن کی ایچ لوگا کر

1- ڈاکٹر صاحبہ الرحمن صاحبہ نے صحیح حد تک لکھ کر نیٹس کی ایچ

الذام لگایا ہے کہ وہ میرا بائیٹ میں مدد

2- میں نے یہ بالکل درست ہے

3- ڈاکٹر صاحبہ نے یہ بھی شکرانہ کی ہے کہ صحیح حد تک لکھ کر

یہ ہیں کاغذ اس کی دھکی دی تھی

2- میں نے یہ بالکل درست ہے

1- ڈاکٹر صاحبہ نے صحیح حد تک لکھ کر نیٹس کی ایچ لگایا ہے

درست ہے اور اس میں کتنی حقیقت ہے

2- وہ صحیح سوچ کے ساتھ ہی ایچ لکھ کر نیٹس کی ایچ لوگا کر

صدمہ صحتیال ساریقت ہے میں اویہ اسکا صحیح تھا

کا اسٹریٹ میں ہے اور اسکو سمجھانے کے لئے اپنے دفتر میں

صدمہ سمجھانے کی کوشش کی جس پر یہ تلمیذی پیدا ہوئی

3- یہاں صحیح حد تک لکھ کر نیٹس کی ایچ دھکی دی

4- میں نے یہ بالکل حقیقت اور بائیٹ ڈیٹس میں بائیٹ لکھ کر

5- یہ لکھ کر اور بالکل ٹھیک ہے اور اسکا لکھ کر

فاریٹ ہوئے کی تھی



از لوازم و بیرون خلاص و همکار مدد لکھن تینیس بی ایچ یو کالجز پور

بیان - احمدیوں اور خاندان مدد لکھن تینیس بی ایچ یو کالجز

س - ڈاکٹر صاحب عبدالرحمن اور صاحب مدد لکھن تینیس بی ایچ یو کالجز

مناجیح علاجی بیوی اس کے رہ میں آگے کیا وہ علاج کے تحصیل میں کیا کرے

ع - وضو نماز اور میں کی لکھن تینیس بی ایچ یو کالجز میں کیا

تاج محمد ڈاکٹر صاحب نے جو تعالیات کی ہے ان کو میں نے تحصیل میں لکھن تینیس

ڈاکٹر صاحب اور میں علم و عقائد کے بالکل درست اور حقائق

بیچھنی ہے -

اس - اُن کے سب دوستوں اور لکھن تینیس ڈاکٹر عبدالرحمن

حضور اظہیر سے لکھن تینیس کی لکھن تینیس لکھن تینیس

ع - اس کے وہ ہے کہ صاحب فاضل تینیس صاحب اور لکھن تینیس

تینیس میرے گرام سا کرتا داتا سمجھتا ہے اور تینیس میرے گرام سا کرتا

کونے بات کرتا ہے کہ ایل ایچ ڈاکٹر صاحب کی کہرتی - تینیس لکھن تینیس

سب میرے اختیار میں ہے اور اس لکھن تینیس لکھن تینیس

ڈاکٹر صاحب کو قانون کیا ہے اور ڈاکٹر عبدالرحمن نے لکھن تینیس

لکھن تینیس حقائق میں کہیں تینیس لکھن تینیس

س - ڈاکٹر صاحب لکھن تینیس نے اس لکھن تینیس لکھن تینیس

ع - ڈاکٹر عبدالرحمن لکھن تینیس لکھن تینیس لکھن تینیس

۱۔ طہریت میں بھی اللہ اہم ہے کہ اسے لایعاً ادا کرنا ہے۔  
کہ وہ کھل کر صحت ہی تھی۔

۲۔ ۱۵۶۸ تا ۱۶۱۸ء تک درستی سے اور ان کا وصف محمد بن ابی بکر  
اور اس کے بعد اکثر باہر ہوئے ہیں اور انہی تائیں کئی کئی جاہل

۱۔ آپ فرید لکھی گینا طاعت میں  
۲۔ علم ریاضیاں میں بھی اکثر وقت تمام تر حالات درست طور پر لکھے ہوئے  
اور دسہین کوئی عجیب و غریب انہی میں سے ہے کئی کئی حکام کی ذمہ  
دار ہیں کہ دسہین کوئی کاروائی کرے

سیدنا/ Nazakat  
دستی نجات خانہ اور  
لاہور یونیورسٹی

15-6-19



آئیڈیشن بر خلاف صحیحہ میں لکھی ٹینیشن کا بیان ہو گا اور جو

بیان (پہلے ہی)

1. ڈاکٹر سعید الرحمن صاحب نے صحیحہ میں لکھی ٹینیشن کا خلاف کچھ شکایتیں  
DHO صاحب کو تحریریں لکھ کر دی ہیں کیا جو کو اس میں بارے میں کچھ حقائق

2. - جو بیان صحیحہ میں ہے اس میں بھی تخیل پر مبنی ہے جو صحیحہ میں لکھی ٹینیشن  
میں اور قانون کا خلاف ہے یہ میں اور اس بارے میں ڈیڑھ سو فی صد اور ڈاکٹر صاحب  
تشریح کا بارے میں صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور  
3. - ڈاکٹر صاحب نے صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی

4. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی  
صحت پر مبنی ہے اور اس بارے میں لکھی  
5. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی

6. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی  
7. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی  
8. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی

9. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی  
10. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی

11. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی  
12. - صحیحہ میں لکھی ٹینیشن پر مبنی ہے اور اس بارے میں لکھی



انکو انشرا بہ خلاف ہمیشہ حدیث کفریہ میں لکھنے کی وجہ سے انکو

بیان کا اثر عبدالرحمن حدیث اخبار حدیث کفریہ میں لکھنے کی وجہ سے انکو

1- انکو ہمیشہ حدیث کفریہ میں لکھنے کے خلاف انکو درخواست کی گئی ہے اور وہ اسکو تسلیم کر کے  
یہ نہیں کہتے کہ حدیث کفریہ کے خلاف انکو شفا ثبات میں لیا گیا ہے۔

2- یہ حدیث کفریہ درست ہے اور حدیث کفریہ کے خلاف انکو شفا ثبات میں لیا گیا ہے۔  
یہ حدیث کفریہ کے خلاف انکو شفا ثبات میں لیا گیا ہے۔

3- انکو ہمیشہ خلاف انکو شفا ثبات میں لکھنے کی وجہ سے انکو

4- ہمیشہ تمام حدیث کفریہ اور حدیث کفریہ کے خلاف انکو شفا ثبات میں لکھنے کی وجہ سے انکو  
حدیث کفریہ کے خلاف انکو شفا ثبات میں لکھنے کی وجہ سے انکو

5- انکو شفا ثبات میں لکھنے کی وجہ سے انکو

واقعہ ہے

6- حدیث کفریہ میں لکھنے کی وجہ سے انکو  
حدیث کفریہ کے خلاف انکو شفا ثبات میں لکھنے کی وجہ سے انکو

7- حدیث کفریہ کے خلاف انکو شفا ثبات میں لکھنے کی وجہ سے انکو

8- حدیث کفریہ کے خلاف انکو شفا ثبات میں لکھنے کی وجہ سے انکو  
حدیث کفریہ کے خلاف انکو شفا ثبات میں لکھنے کی وجہ سے انکو

9- حدیث کفریہ کے خلاف انکو شفا ثبات میں لکھنے کی وجہ سے انکو

DVA

OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER

No. 4197-4902 / 1

Dated Buner, the 15/06/2015



0939-510-138 | dhobuner@gmail.com | Fax-0939-510-138

OFFICE ORDER /conducting of enquiry

Reference this office No. 3081-33 dated 8-06-2015 is hereby withdrawn.

The following doctors attached to DHO office Buner will conduct the same inquiry, on the written request Mr. Hamsher Khan J/PHCT/Tech; MP BPS-09 attached to BHU Gagra (copy enclosed).

1. Dr. Abdul Wahid Coordinator CDC BPS-19
2. Dr. Lal Bacha Coordinator EPI BSP-17

They are hereby further directed to report to the undersigned within 03 days positively.

*[Signature]*  
District Health Officer

District Buner

15/06/2015

No. 4197-4902 / 1 / 15/06/2015 Dated *[Signature]*

Copy to;

1. The above named Doctors
2. Mr. Hamsher J/PHC
3. P/file
4. Acctt;/Estab
5. P/file

*[Signature]*  
District Health officer

District Buner

P/File



*Amended*  
**OFFICE OF THE  
DISTRICT HEALTH DEPARTMENT  
BUNER**

Office Ph I & Fax #: 0939 - 510138

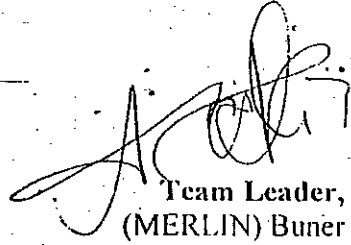


**Office Order: Transfer of Staff**

The following transfers have been made in connection with inquiry report for smooth operations of Department of Health Buner for the best interest of the public with immediate effect.

Sno.	Name	Designation	Current Location	New Location	Remarks
1	Najmunisa	LHV	BHU Dakoda	THQ Pacha	Based on inquiry report
2	Hamsheer	JPHC MP	Tech BHU Gagra	BHU Charorai	Based on inquiry report
3	Muhammad Asif	JPHC MP	Tech BHU Charorai	BHU Gagra	Replacement of vice Sno. 2

You are directed to submit the arrival report to this office.

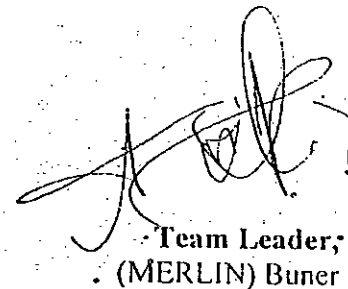
  
Team Leader,  
(MERLIN) Buner

No.: TL-BN/0705

Dated Daggar Buner the 16/7 /2015.

CC:

- DC Buner
- DHO Buner
- MO Incharge concerned
- Hub Coordinator
- The above name officials

  
Team Leader,  
(MERLIN) Buner

From

Dr. Saeed ur Rahman. M/O  
Incharge BHU Gagra

TO,

Hamsher JMT

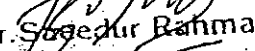
Subject: Relived From Duty

In Connection of Transfer Order  
No FL-BN/0705, Dated 16/07/2015  
You are relived from BHU Gagra, Dated  
25/07/2015 for smooth operation  
of B. H. U Gagra

CC:

- Team Leader Merltn Buner
- Hub Coordinator Merltn
- DHO Buner

The above name official

  
Dr. Saeed ur Rahman  
I/c Medical Officer,  
BHU Gagra Dist: Buner

25/07/015  
9 AM.

Amjad Ali

C 3

GOVERNMENT OF KHYBER PAKHTUNKHWA  
OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER  
Email: Dhobuner@gmail.com. Phone & Fax: 0939-510138

NO: 2184-92/PP

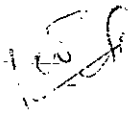
Dated: 18-07-2019

**OFFICE ORDER.**

The following posting / transfer of PHC Tech (MP) BS-12 with immediate effect in the interest of public.

S.No	Name	From	To	Remarks
1	Mr. Hamser Khan PHC Tech: (MP), BPS-12	BHU Gagra BD-6277	BHU Toorwarsak BD-6265, Vide ID Code NO:80025454	
2	Mr. Ghulam Raziq PHC Tech (MP) BPS-12	BHU Toorwarsak	-BHU-Gagra BD-6268 Vide ID Code NO:80025419	

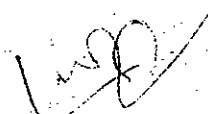
Arrival /Departure report should be submitted to this office for record.

  
District Health Officer  
District Buner

Enclst No & Dated Even:-

Cope to:

1. District Account Officer Buner.
2. DDHO GMK for information
3. DDHO Daggar For information.
4. I/C BHU Toorwarsak for information.
5. I/C BHU Gagra for information.
6. Acctt/Esib Of this office.
7. The above named Official.
8. IMU Swat.
9. P/File.

  
District Health Officer  
District Buner

No: 03

Date: 6/8/18

To

The District Health officer  
Buner

**Subject : NON COMPLIANCE OF TRANSFER ORDER**

DIARY NO: 377  
Date: 6/8/2018  
BHO Buner

Respected Sir

Referenced your Order Number 6226/35 Dated 31/7/18 where by Mr. Hamsher Khan MT was transferred form BHU Gagra to RHC Dewanababa on administrative/ Disciplinary ground . previosly the official was transferred to a romote health station BHU charorai in the consequence of a Series of enquiries. then he politically managed to get him Self transferred DHQ Hospital Daggar On Genral Duty. when the General Duty was Cancelled the Official was directed to report to their Original Place of Duty. Mr Hamsher Khan Should have reported to his Original Place of duty BHU Charorai. Instead of doing So he Kept on Coming BHU Gagra and got his named entered in the attendance Register illegally . Now that the official has been transferred to RHC.Dewanababa freshly he should report to the MO I/C of that Facility as he was neither an official of BHU Gagra before the General duty in DHQ H daggar nor after Cancellation of General duty . owing to the above Facts and figures he may be direct to resume duty either in the new station or BHU charorai . in the meanwhile he his Pay may be stopped ,because he Keeps on Coming to BHU Gagra inseat performing duty in RHC dewanababa. If he does not stop form committing futile attempts of performing duty in BHU Gagra then I will be Constrained to report matter to SHO Gagra for initiating Legal action against him .

Dr.Nadir Khan MO I/C  
BHU Gagra

No: 001-003 Date: .....

Copy To:

- (1) Deputy commissioner Buner for information
- (2) Director general health services KPK
- (3) DMU Health

Dr.Nadir Khan MO I/C

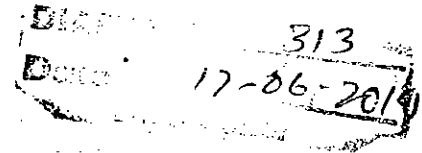
BHU Gagra

Entailed  
at  
6/8/18



To

The District Health Officer  
Daggar Buner



**Subject: ACTION AGAINST MR. HAMSHIR KHAN FOR HIS WICKED AND INTORABLE BEHAVIOR WITH THE UNDERSIGNED.**

Respect Sir,

I have the honor to bring in your kind notice that I am serving as medical officer I/C BHU Gagra since 01-01-2018 copy of the order of mine is attached herewith for ready reference. In this connection a Para wise detail in submitted for your kind attention.

1. ~~Mr. Hamshir Khan~~ M.T who has been transferred form BHU Gagra on administrative ground in the consequences of a detail enquiry having some immoral aspects. Arrived in BHU Gagra on 23-06-2018. On arrival he behaved with me roughly and rudely so I complained to the DHO. Copy of the complaints in attached. In the result of this complaints Mr. Hamshir Khan was transferred to RHC Dewana Baba on Administrative ground but he did not obey the order. On the second time the was once again transferred to the RHC Dewana Baba on administrative ground in the result of a comprehensive enquiry. On the third time he was transferred from BHU Gagra to RHC Dewana Baba on the recommendation of tehsil Nazim Tehsil Gagra. He has neither obeyed no cancelled any of the orders.
2. Recently he has given the threats to the staff of BHU Gagra. Today he has captured my office force fully and on my advice to vacate my office he used very very harsh abuse and rough language against me and tried to hurt me physically. But my staff member Mr. Umar Zeb EPI Tech rescued me so it is further intolerable and impossible for me to continue my services in BHU Gagra in the presence of the said wicked of official.
3. So it is requested to relieve Mr. Hamshir Khan form BHU Gagra through departmental action and also through law enforcing agencies.  
In case of any negligence or any risk to my life I keep my legal right reserve.

Hamshir Khan  
17/06/18

Your's Obediently

Dr. Nadir Khan  
Medical Officer I/C  
BHU Gagra Buner

Date: 17/06/18



GOVERNMENT OF KHYBER PAKHTUNKHAWA  
OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER  
EMAIL:DHOBUNER@GMAIL.COM. PHONE & FAX:0939-510138

No: 4700

Dated: 19<sup>th</sup> December 2019.

To,

The Incharge  
BHU Toorwarsak.

Subject: Detail report of Mr.Hamshir MT Duty.

Memo,

It is sated that Mr.Hamshir Medical Technician BS-12 has been transfer to BHU toor warsak vide this office Letter: 2184-82 date: 18/12/2019 :( copy attached)

Moreover the IMU regularly reported <sup>has</sup> absent. You are hereby directed to submit detail report against Hamshir Khan with the Photo Copies of Attendance register.

  
District Health Officer  
District Buner

To

The DHO  
Distt Buner.

Subject: Absence Report of PHC-Teel

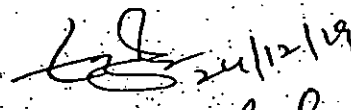
Mr Hamshir Khan

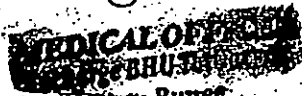
Respected Sir,

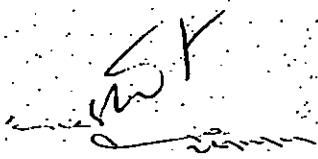
By your office order # 4700 dated 19-12-2019  
it is stated that Mr Hamshir Khan (PHC-Teel) transferred  
to BHU Torwarsal vide office order # 2184-92/PF on  
18-07-2019, ~~never~~ <sup>Never</sup> submitted his annual report  
to this health facility ~~manus~~ till date 24-12-2019  
his absence report sent to DHO office  
on 29/07/2019 (copy attached).

As he has not joined his duty  
therefore we have not entered his name  
in attendance register, copy of attendance  
register is attached here with.

THANKS

  
Dr. Fazl uladood





To

The District Health Officer  
at Daggar District Buner.

Subject: MEDICAL OFFICER I/C BHU GAGRA DO NOT ALLOW ME TO MARK ATTENDANCE FOR A PERIOD OF MORE THAN TWO WEEKS.

Memo;

I have the honor to submit that I am doing my duty here in BHU Gagra at original post since long. I am physically hundred percent present at the station during duty hours, but the medical Officer BHU Gagra do not allow me to mark may attendance in register as per rules.

Moreover, the register has been kept locked under his strict watch.

I have so many time requested him to give me the register for attendance, but he repeatedly refused to do so.

Dear Sir, I have no choice other than to request you in this regard.

The following points must be remember sir;

- 1- The Medical Officer BHU Gagra do not follow the orders and rule of his high-ups and committed wrong after wrong and shows his personal interest in the health facility matters.
- 2- The Medical Officer BHU Gagra consider the Health facility his own personal property and he treats everything according to his own interest and wishes.
- 3- Due to his this act of injustice create only panic situation in the peaceful atmosphere of the Health facility.
- 4- Sir, the Medical Officer incharge BHU Gagra ruins all the laws, orders and rules regulations.

Therefore, it is necessary to take a drastic step against him in respect his disputed and illegal position as per rules

With a lot of thank

Your's obediently,  
Hamsher Khan MT.  
BHU Gagra

Dated; 09-08-2018

Copy to;

- 1- Deputy Commissioner Buner.
- 2- Inquiry Officer Assistant Commissioner Daggar.
- 3- DG Health Khyber Pakhtunkhwa Peshawar for information, please.

① HO Buner

Please, dispute of the case  
on merit at the earliest

① Hamsher  
13/8/18

Hamsher Khan  
09/08/18

PIF

ANG

5

Office of the MO/IC BHU Gagra distt Buner.

To,

District Health Officer Buner.  
Team leader Merlin Buner.

Subject, Request for disciplinary action on Bad conduct, misbehave, disobedience and threats of MT Hamsher of BHU Gagra district Buner . .

Sir,

It is to state that the above subjected official was found involved in some suspicious activities of bad conduct since long, evident by my own daily observation, community complaint and repeated verbal reports of BHU staff, which cannot be explained at this level due to some traditional reasons of deserved and religious community.

Being MO/IC the said above official was called and advised sympathetically at my office in privacy and in detail with the evidences in my knowledge, he was advised to leave up these bad conduct and unaffordable activities/behavior.

But in response of the above proper correspondence what he did is that, he went out of control and replied as a mad person and threaten me as follows,

- "I will do everything which I would like and no one can forbid me and cannot change my present working position and I know each thing what is good and what is bad.
- I will blame you in community that you are abusing me to provide some female to you.
- I will hurt myself for getting self induced fracture of bone and will register FIR in police department against you.
- I will arrange a press conference and will blame your involvement in sexual harassment.
- I will create law and order situation in the BHU and will not allow you to perform your duties "

It is further added that during talking his language was extremely harsh and his body language was full of terror, which shows the severity of the matter.

Respected Sir,

it was too shocking for me as I was in sympathy with him and such a reaction was out of my expectation from him and which cleared my mind further to the root cause of his involvement and his bad conduct.

Refusal from changing his present working position (as trainer to Lady Health Workers) is another evidence of his concerns. Further detail is not good as I have mentioned above.

Being a responsible head of BHU so for I could handle my staff I did it to some extent but still facing some difficulties because of the behavior he made, which is not forgettable for me, and action and reaction could be repeated any time and my counter action may also be consider in future.

It is therefore requested in the light of above statement that disciplinary action may please be taken against Mr Hamshir MT of BHU Gagra , which in my opinion may be his immediate transfer so that I can run the routine activities of my institute (LHWs program, EPI and OPD) freely and smoothly in the best interest of public services and may please be followed by his suspension order, enquiry and charge sheet,

He may be charge sheeted for the following,

1. Bad conduct on his loose character evident by me, the community and staff of BHU Gagra.
2. Misbehave on his harsh speaking and terroristic body language.
3. Disobedience on refusing to change his working position in BHU.
4. Threats as discussed above.

I hope that this request may please be honored as serious public issue but not as my Personal conflict, and it is first attempt to report my subordinate to the higher authorities For disciplinary action, but the behavior of the above official compelled me to do so.

Copy to

- Director General health services KPK Peshawar for information and necessary action please.
- Deputy Commissioner Buner for information and necessary action please.
- District Police Officer Buner for information and with the request to watch the activities of Hamshir medical technician of BHU Gagra Buner to avoid any violence in future please.

Your sincerely .

Dr. Saedur Rahman  
Medical Officer Basic Health unit  
Gagra Buner

29/05/2015

The District Health Officer,  
Buner at Daggar.

Subject: Non Acceptance of  
Arrival Report / Transfer of  
Mr. Hamsir Khan MT

Sir,

Reference your office order no 2815-20  
dated 19/6/2018.

ie Cancellation of G. duty. It is  
worth mentioning that Mr. Hamsir  
Khan has been transferred from  
BHU Gogra on administrative grounds.  
Consequent upon a lengthy and trouble-  
some enquiry, which is present in original  
in your office. However copy of the Enquiry  
and other documents is attached here  
with. Being a negative and non-cooper-  
ative official. It is not possible  
for me to run the BHU administrative  
smoothly and also clear from the Service  
and track record of Mr. Hamsir Khan.  
It is therefore requested from your yourself



**OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER**  
Phone & Fax # 0939-510138, Email: dhobuner@gmail.com

No. 6226-35 /

Dated the 31 / /07/2018

**OFFICER ORDER / POSTING/TRANSFER.**

In the written statement/application in r/o Medical officer BPS-17 MO I/C BHU Gagra vide no.nil dated 27/07/2018 ( copy attached)

The following posting/transfer of PHC Tech; MP BPS-12 is hereby order with immediate effect in the best interest of public service on administrative ground.

S#	Name	from	to	remark
1.	Mr. Hamsher Khan	BHU Gagra	RHC Dewanababa	against the vacant post of Mr. Said Zarin Shah PHC/Tech; MP, due to long leave

Arrival/Departure report should be submitted to this office..

*[Signature]*  
District Health officer  
District Buner

No

Dated/

/ /2018

Copy forwarded to;

1. Director General Health Services KPK Peshawar
2. Deputy Commissioner Buner for information
3. District Nazim Buner for information
4. MO I/C RHC Dewanababa
5. DAO Buner
6. IMU swat
7. I/C BHU Gagra
8. The above name official.
9. Acclt; estab: section
10. P/file

*[Signature]*  
District Health officer  
District Buner



From: *Mr. Amir Nawaz Senior PHC Tech MP BPS-14*  
To: *RHC Deewana/Babu BHU Gagra*  
Subject: *Mr. Amir Nawaz Senior PHC Tech MP BPS-14 will continue his duty at BHU Gagra till further order.*

Arrival / Departure report should be submitted to this office.

*[Signature]*  
District Health Officer  
Buner at Daggan

No. *323-30* DDHO/GMK.

Dated: *13/11/2018*

Copy forwarded to:-

1. The Deputy Commissioner Buner
2. The Deputy District Health Officer Tehsil GMK Buner
3. The MO I/C RHC-Deewana Baba Buner
4. The MO I/C BHU Gagra Buner
5. The above named Officials
6. The Acctt./Esstr. of this office
7. The IMU
8. The P/File

*[Signature]*  
District Health Officer  
Buner at Daggan

~~Page~~ e

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

Appeal No 1121 of 2019

**Hamsher Khan**

.....Appellant

**VERSUS**

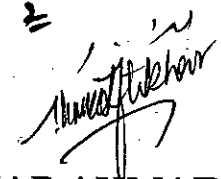
**D.G Health K.P & others**

.....Respondents

**INDEX**

<b>S#</b>	<b>Description</b>	<b>Annexure</b>	<b>Pages#</b>
1.	Reply / comments	***	1-4
2.	Copies of inquiries / relevant documents	A to E	5-48

Respondents No. 3, <sup>to</sup> 6  
Through Counsel <sup>is</sup>

  
**IFTIKHAR AHMAD NASIR**  
Advocate, High Court

Office: S:24, 3<sup>rd</sup> Floor, Continental Plaza,  
Makanbagh, Swat

Cell No: 0313-9432683

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

Appeal No 1121 of 2019

Hamsher Khan .....Appellant

VERSUS

D.G Health K.P & others .....Respondents

Appeal against the transfer

Reply / parawise comments of respondent

No. 3, <sup>7</sup>5, <sup>2</sup>6

Respectfully Sheweth,

The respondents No. 3,5 & 6 submit as under:-

Preliminary Objections:-

- i) That the appellant has got no cause of action against the respondents No. 3, <sup>7</sup>5, <sup>2</sup>6.
- ii) That the appeal in hand is not maintainable in its present form.

- iii) That the appellant has not approached this honorable tribunal / court with clean hands.
- iv) That the appeal in hand is barred by law.
- v) That the appellant filed the instant appeal with mala-fide.
- vi) That the appellant is not entitled for the relief as prayed for.
- vii) That the present appeal is liable to be dismissed with costs throughout.

### FACTS

- 1) That the para No. 1 is correct, however the appellant was transferred to BHU Charorai consequence upon a series of enquires. (Copies are annexure "A", "B", "C", "D" & "E" respectively)
- 2) That the para No. 2 is incorrect.
- 3) That in the reply of para No. 3 it is submitted that the appellant was transferred after proper enquiry on the ground of morality and public

interest and was not the beneficiary of the said order.

- 4) That the reply of para No. 4 is given in details, in the reply of paras No. 1 to 3.
- 5) That in reply of para No. 5 its submitted that the said application was also filed by the appellant with malafide, and said enquiry was without jurisdiction, which set aside by the competent authority to the extent of respondent No. 3, 4.
- 6) That in the reply of para No. 6 it submitted, that the appellant was transferred by the competent authority and the appellant has to obey the said order.
- 7) That in the reply of para 7, it is submitted that the said order was passed by the competent authority and the cheekar history of the instant case speaks about the malafide of the appellant.

#### ON GROUNDS

a) Incorrect.

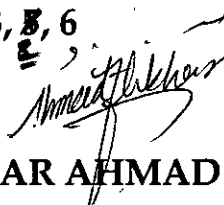
b) Incorrect.

c) Incorrect.

- d) Incorrect.
- e) Incorrect.
- f) Incorrect.
- g) Incorrect in it is present form.
- h) No need of reply.
- i) No need of reply.

In view of the above submissions, it is very humbly prayed that the appeal in hand may kindly be dismissed with cost.

Respondents No. 3, 5, 6  
Through

  
**IFTIKHAR AHMAD NASIR**  
Advocate, High Court

Annexure A

(2)

(5)

Annex

Office of the MO/IC BHU Gagra distt Buner.

To,

Annexure A

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Team leader Merlin Buner.

Subject, Request for disciplinary action on Bad conduct, misbehave, disobedience and threats of MT Hamsher of BHU Gagra district Buner.

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(6)

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- Deputy Commissioner Buner for information and necessary action please.
- District Police Officer Buner for information and with the request to watch the activities of Hamshir medical technician of BHU Gagra Buner to avoid any violence in future please.

Your sincerely .

  
Dr. Saedur Rahman  
Medical Officer Basic Health unit  
Gagra Buner 29/05/015



7

OFFICE OF THE  
DISTRICT MAGISTRATE/  
DEPUTY COMMISSIONER,  
BUNER.

No:DC(B)/AG-III(II) 10179  
Dated: 01-06-2015.

To  
The District Health Officer  
Buner.

Sub: REQUEST FOR DISCIPLINARY ACTION ON BAD CONDUCT,  
MISBEHAVIOUR, DISOBEDIENCE AND THREATS OF MT  
HAMSHER OF BHU GAGRA DISTRICT BUNER.

Memo:

Reference a letter submitted by one Dr. Saedur Rahman Medical Officer Basic Health Unit Gagra, Buner against MT Hamsher of BHU Gagra, District Buner, on the subject noted above.

In this context, it is requested to conduct an impartial inquiry and take immediate action under intimation to this Office.

DEPUTY COMMISSIONER  
BUNER.

Action has already  
taken against hamsher  
the rules. / /

01/06/15  
D. S. S.  
District Buner

8

OFFICE OF THE DISTRICT HEALTH OFFICER, DISTRICT BUNER

No. 4197-4202 / 1

Dated Buner, the 15/06/2015



0939-510-138 | dhobuner@gmail.com | Fax-0939-510-138

OFFICE ORDER /conducting of enquiry

Reference this office No. 3051-83 dated 8-06-2015 is hereby withdrawn.

The following doctors attached to DHO office Buner will conduct the same inquiry, on the written request Mr. Hamsher Khan J/PHCI/Tech; MP BPS-09 attached to BHU Gagra (copy enclosed).

1. Dr. Abdul Wahid Coordinator CDC BPS-19
2. Dr. Lal Bacha Coordinator EPI BSP-17

They are hereby further directed to report to the undersigned within 03 days positively.

*[Signature]*  
District Health Officer

District Buner

15/06/2015

No. 4197-4202 / 1 <sup>file</sup> 1/29/2015 Dated

Copy to;

1. The above named Doctors
2. Mr. Hamsher J/PHC
3. P/file
4. Acctt;/Estab
5. P/file

*[Signature]*  
District Health officer  
District Buner

9

OFFICE OF THE DISTRICT HEALTH OFFICER, DISTRICT BUNER


No. 3081-83 /

Dated Buner, the 8/06/2015

0939-510-138	dhobuner@gmail.com	Fax-0939-510-138
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OFFICE ORDER/ CONDUCTING INQUIRY

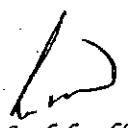
1. Compliant against Mr.Hamsher J/PHC/Tech;MP BPS-09 attached to BHU Gagra, duly submitted by Dr.Saeed-ur-Rehman MO I/C BHU Gagra is enclosed.
2. Explanation letter called by this office from Mr.Hamsher vide this office No. 2938 dated 29/05/15 is enclosed.
3. Reply of the explanation in r/o Mr.Hamsher dated 03-06-2015 four pages are enclosed herewith, which all are self-explanatory. Dr.Amir Zahir SMO I/C CH Chamla & Dr.Lal Bacha Coordinator EPI, both are working in the Health Deptt; District Buner are hereby directed to conduct inquiry within a week & report to the undersigned for further n/action.

  
 District Health officer  
 District Buner  
 /2015

No. / Dated. /

Copy to;

1. Dr.Amir Zahir CH Chamla
2. Dr.Lal Bacha Cordinator EPI
3. Acctt;/Estab
4. P/file

  
 District Health officer  
 District Buner

(10)

**OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER**  
Phone & Fax # 0939-510138, Email: dhobuner@gmail.com

No. 2983

Dated the 3/26/2015

To,

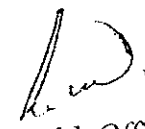
The Deputy Commissioner Buner  
District Buner

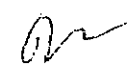
Subject:-

**REQUEST FOR DISCIPLINARY ACTION ON BAD CONDUCT  
MISBEHAVIOR, DISOBEDIENCE**

Memo,

Reference your letter No.DC(B)AG-III(H)10179 dated 01-06-2015, on the subject noted above. I have the honor to submit that action has already taken against Mr. Hamsher J/PHC/Tech;MPBPS-09 attached to BHU Gagra District Buner for information please.

  
District Health Officer  
Buner



- (11)
1. Dr. Abdul Wahid CDC BPS-19 inquiry officer
  2. Dr. Lal Bacha EPI Coordinator BPS-17 inquiry officer

Subject:- STATEMENT/ QUESTIONNAIRE TAKEN FROM MO I/C DR.SAEED-UR-REHMAN BHU GAGRA

Memo,  
Question No.1. Do you accept us as inquiry officer in the inquiry to be conducted on your complaint against the M.T Mr.Hamsher? (Copy attached)

yes

Question No.2. Is it right that the complaint submitted by you? (Copy attached)

yes

Question No.3. do you accept that the charges leveled by <sup>you</sup> against the M.T Mr.Hamsher are 11 in No..?

Question No.4 From what date the person under complaint is working under your supervision &/on the present post?

He is working for since long, But I observed him during newly recruited L.H.Ws training and remain under my complaint when 15-20 days passed of starting the training.

Question no.5 Have you called any explanation from the person before this complaint in connection of such charges or any others charges?

No any explanation has been called  
But verbal advise has been given <sup>Two times</sup> for  
Correction his behavior.

Question.6. Have you informed the competent authority from such charges or any other charges labeled against the person before this? If any, submit to the inquiry officer.

The district health officer has been informed verbally during his visit of this unit in month of May 2015. And written Complaint submitted on 29.5.2015.

Question .7. Is this complaint submitted by you, sufficient or otherwise?

Yes it sufficient, But I can provide witnesses in behalf of his misbehavior and Misconduct of Mr. Howsher

Question 8. Submit any relevant documents in the support of your complaint to the inquiry officers?

Yes, it is already submitted to you.

*[Signature]*

Dr. Abdul Wahid CDC  
BPS-19 inquiry officer

*[Signature]*  
Dr. Saqdur Rahman  
DC Medical Officer  
BHO Gagra Distt: Buner

*[Signature]*

Dr. Lal Bacha EPI  
Coordinator BPS-17 inquiry officer

بیان - مومن کاں جو لکھنؤ کے ایسے لوگ تھے کہ -

1 - مائیں اور ڈاکٹر صاحب کے درمیان جو تاریخ ملاحظہ ہوئی کیا بچیاں  
پیدا ہوئی ہیں جو خود لفظ اور یہاں واقعہ ہوا

2 - میں تو باپ یعنی ڈاکٹر صاحب کے اخراج کے ساتھ ہی بچیاں  
اور انہوں سے بڑے ذرا کی باتیں سنائیں کہ انہیں لفظی - الٹے سے لفظ  
نہ ہوئے کہ ڈاکٹر صاحب کو بتایا گیا اور ڈاکٹر صاحب نے کہا کیا اللہ جل جلالہ  
کی سے باتیں لکھنؤ اور سے سنائے ہیں تو

3 - مائیں سے لفظی الزام ہے کہ وہ لکھنؤ کے لوگوں کے لئے لکھی ہیں  
ڈاکٹر صاحب سے پہلے اپنے لئے ہیں یہاں تا کہ اور ان سے کچھ  
ماہانہ لفظی ہیں

2 - وہ لفظی 2000 سے سویر لفظی 7 - مائیں سے لفظی  
اور مائیں سے لفظی لکھنؤ میں نے انکو بتایا کہ وہ مائیں سے لفظی  
لکھنؤ میں آیا کہ وہ لکھنؤ میں بتایا کہ وہ لکھنؤ میں لکھی گئی تھیں  
اس لئے مائیں سے لفظی لکھنؤ میں اور جب مائیں سے لفظی لکھنؤ میں  
مائیں سے لفظی لکھنؤ میں لکھی گئی تھیں انہیں لکھنؤ میں لکھی  
مائیں سے لفظی لکھنؤ میں اور لکھنؤ میں لکھی گئی تھیں

3 - یہ مائیں سے لفظی لکھنؤ میں

4 - یہ لفظی لکھنؤ میں یا لکھنؤ میں یا لکھنؤ میں

5 - لکھنؤ میں لکھی گئی تھیں انہیں لکھنؤ میں لکھی گئی تھیں

2 - لکھنؤ میں لکھی گئی تھیں انہیں لکھنؤ میں لکھی گئی تھیں

یہ سب سے پہلے اس کی جانچ کر لی جائے گی کہ کیا یہ ایک  
مافیا گروہ ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

1- ڈیوٹی کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

2- دو ڈیوٹی کے بارے میں جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

آئیے دیکھیں کہ اس کے بارے میں کیا جاننا ضروری ہے  
کہ اس کے بارے میں کیا جاننا ضروری ہے

وقت کوئی اور بھی نہیں ہو سکتا تھا اس لیے  
اس کے بارے میں کیا جاننا ضروری ہے

1- اس کے بارے میں کیا جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

2- اس کے بارے میں کیا جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

3- اس کے بارے میں کیا جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

4- اس کے بارے میں کیا جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

5- اس کے بارے میں کیا جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

6- اس کے بارے میں کیا جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے

7- اس کے بارے میں کیا جاننا ضروری ہے کہ کیا یہ ایک  
ڈیوٹی ہے یا نہیں اس کے بارے میں جاننا ضروری ہے



بیان صحیح الہدایہ سوتیلے جی اے بی و سائیکس

۱۔ ڈاکٹر عبدالرحمان اور صدر عبدالکلام نے دہلی میں  
 ۲۔ صحیحہ کے معلق پر یہ کہ وہ خود بخود روز جمعہ میں صحت مند  
 آئے اور ڈاکٹر صاحب اور علمبردار صاحب نے موجود صحیحہ تو ڈاکٹر صاحب  
 ، صحت مند کو کیا کہنا ہے اس لئے کہ اس وقت شریعت میں دین  
 اور اہل حق و باطل کو کفر میں لینے کا شکر اور اہل حق کو  
 علمبرداروں کو لکھنا ہے۔

اس پر صدر ابوبکر نے فلاح اخلاق کیا کہ میں شریعت میں  
 دین اور کفر میں بھی جاؤ تھا تو کون عید الہی میں لکھتا  
 اس کا لکھنا صحیح اور علی عثمان کے لئے کوئی حق ہے لکھنا اور  
 حق ہے اس کے ساتھ باعتراف لکھنا اور دین سے اور ہمیں دین  
 کہ صحیح اور ڈاکٹر صاحب کے لئے اس میں کچھ نہیں لکھنا  
 صحیح ڈاکٹر صاحب ہمیں لکھنا ہے صحیح لکھنا اور کفر سے باعتراف  
 لکھنا ہے لیکن صحیح لکھنا اور لکھنا ہے صحیح لکھنا  
 صحیح لکھنا ہے الزام ہے کہ وہ صحیح لکھنا ہے  
 صحیح لکھنا ہے اور لکھنا ہے صحیح لکھنا ہے

۱ - حضرت عائشہ رضی اللہ عنہا کو یہ سچا فقر لکھنا کی دھمکی دیا گیا

۲ - حضرت عائشہ رضی اللہ عنہا نے جو اللہ تعالیٰ سے بات کی وہ سچا فقر لکھنا کی دھمکی دیا گیا  
 ۱ - حضرت عائشہ رضی اللہ عنہا کو یہ سچا فقر لکھنا کی دھمکی دیا گیا اور اس پر حضرت عائشہ رضی اللہ عنہا نے فرمایا  
 یہ کہہ کر اللہ تعالیٰ سے سچا فقر لکھنا کی دھمکی دیا گیا

۳ - حضرت عائشہ رضی اللہ عنہا کو یہ سچا فقر لکھنا کی دھمکی دیا گیا

۲ - حضرت عائشہ رضی اللہ عنہا کو یہ سچا فقر لکھنا کی دھمکی دیا گیا

بسم اللہ

دستاورد حضرت عائشہ رضی اللہ عنہا  
 حضرت عائشہ رضی اللہ عنہا  
 لایع لوجہ کائنات

میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے

بیان سراج خان وارڈ آرڈر

- 1- ڈاکٹر عبدالرحمان صاحب نے 04/10 کو میرے درخواستوں کے عین میں  
میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے
- 2- صحیح زبان کی ڈاکٹر صاحب نے وارڈ آرڈر کے طور پر بتایا تھا کہ اس کے مطابق وہاں  
لوٹیئر کو یہ مشق دینی ہے کہ ہمیشہ صحیح دھکیاں دے اور یہ اڑائی ہے
- 3- ڈاکٹر صاحب نے ڈاکٹر صاحب کو اس وقت کی دھکی دی تھی
- 2- ڈاکٹر صاحب نے وقوعہ کے کچھ دن بعد اس وقت صحیح تفصیلی بیان  
دیا اور باقی نزالت 04/10 ڈاکٹر صاحب اور ڈاکٹر صاحب درمیان مبالغہ آمیزی  
کی ڈاکٹر صاحب نے اس لئے ڈاکٹر صاحب نے ہمیں بتایا کہ اس کے بعد لوٹیئر  
کو لوٹیئر بنانا ہے اور اس کا اندازہ لوٹیئر کے حساب سے لیا جائے گا  
پھر اس لئے روز بروز 30/15 کو ڈاکٹر صاحب نے ہمیں بتایا کہ ڈاکٹر صاحب  
نے دھکی دی ہے کہ میں اپنے اوپر لٹیر ڈکڑوں کا اندازہ ہے اس لئے صحیح  
FIR لکھو اور صحیح بیان دے دو لٹیر ڈکڑوں کی ڈاکٹر صاحب  
مجھ سے مطالبہ کرتے تھے کہ صحیح لٹیر ڈکڑوں کی ڈاکٹر صاحب لکھا  
گیا اور ڈاکٹر صاحب نے مجھ پر لٹیر ڈکڑوں لکھا ان باتوں کو سن کر مجھ  
پر مناسب نہ سمجھا کہ ڈاکٹر صاحب کو مبالغہ کر کے مجھ پر لٹیر ڈکڑوں  
1- ڈاکٹر صاحب نے ڈاکٹر صاحب کے افعال سے اتفاق سے لٹیر ڈکڑوں لکھا  
2- ڈاکٹر صاحب نے ڈاکٹر صاحب کو بتایا کہ اس کے بعد لوٹیئر لکھیں
- 3- میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے
- 4- میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے
- 5- میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے
- 6- میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے
- 7- میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے
- 8- میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے
- 9- میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے
- 10- میرا مددگار محمد علی بیگ کو بھیج دیا گیا ہے

سید ڈاکٹر محمد حسین کفری کی بھی دھمکی دی تھی

2- اس قول کا اصرار و سب سے پہلے ہی دہلی کی دہلی کی تھی کیونکہ وہ وقت کے اہل حقین کی طرف سے تھی اور یہ بھی کہ اس وقت کے اہل حقین کی طرف سے تھی۔ لیکن میں اس وقت سے کہ

3- حضرت محمد صلی اللہ علیہ وسلم نے جو کچھ فرمایا ہے اس سے کفر سے باز رہنا ہے۔ اگر کوئی شخص اس سے کفر سے باز نہ رہے گا تو وہ کفر سے باز نہیں رہے گا۔

2- مجھے ان باتوں کا تفصیلاً علم نہیں ہے البتہ یہ لوگ کیا اور کسے کفر سے زیادہ نڈان جاتی اور چونکہ یہ لوگ کفر سے باز نہیں رہے ہیں اس لیے وہ کفر سے باز نہیں رہے ہیں۔

3- ہم پھر بھی یہ کہیں گے۔ نافرمانی، کھلیاں، آفرینہ کیوں اسے سوا اور

2- اس سے اس میں کچھ نہیں بتا سکتا یہ ہمیں کچھ نہیں بتا سکتا

3- حضرت محمد صلی اللہ علیہ وسلم نے جو کچھ فرمایا ہے اس سے کفر سے باز رہنا ہے۔ اگر کوئی شخص اس سے کفر سے باز نہ رہے گا تو وہ کفر سے باز نہیں رہے گا۔

2- چونکہ اس وقت کے اہل حقین کی طرف سے تھی اور یہ بھی کہ اس وقت کے اہل حقین کی طرف سے تھی۔ لیکن میں اس وقت سے کہ

۶۶۷

دوسرا سراج محمد وارثی کی جانب سے لکھا گیا

لکھنؤ

انکو ایشین بات سے مستعد کر کے لکھنے کی تیار کرنا اور انکو پکارنا

بیان علی احسان - PNE کی تیار کر کے لکھنے کی تیار کرنا

س۔ ڈاکٹر صاحبہ کے لئے یہ بات ہے کہ مستعد کر کے لکھنے کی تیار کرنا

الزام لگانا یہ کہ وہ میرا بات میں مددگار

1۔ میں نے بالکل درست ہے

س۔ ڈاکٹر صاحبہ نے یہ بات لکھنے کی تیار کر کے لکھنے کی تیار کرنا

یہ بات لکھنے کی تیار کر کے لکھنے کی تیار کرنا

2۔ میں نے بالکل درست ہے

س۔ ڈاکٹر صاحبہ نے یہ بات لکھنے کی تیار کر کے لکھنے کی تیار کرنا

درست ہے اور اس میں کتنی حقیقت ہے

2۔ وہ صبح سویرے سات بجے اٹھتی ہیں اور دو بجے کو لو بلا لیا تھا

صباح سویرے سات بجے میں اویہ اسکا صبح سویرے سات بجے

کی اسٹریٹ میں آئے اور کچھ دیر میں اسی جگہ پر آئے اور کچھ دیر

صباح سویرے سات بجے میں اویہ اسکا صبح سویرے سات بجے

س۔ یہاں سے ڈاکٹر صاحبہ کو مددگار لکھنے کی تیار کر کے لکھنے کی تیار کرنا

تھی

2۔ میں نے بالکل حقیقت اویہ بات لکھنے کی تیار کر کے لکھنے کی تیار کرنا

4 بجے لکھنے کی تیار کر کے لکھنے کی تیار کرنا

کارہ لکھنے کی تیار کر کے لکھنے کی تیار کرنا

۱۔ ڈاکٹر صاحب نے اپنے بیان میں کیا ہے کہ ان کو جو حضرت محمد

۲۔ تھی اس میں کتنی حقیقت ہے۔  
جس کا نام ہے محمد پر بندہ کا ہمارے ساتھ لے کر آیا تو میں  
دیکھیں کہ کس نے ان کو آج، اللہ کے لئے تو جس کی تو میں ابھی  
ٹانگیں گھوڑوں پر تھیں

۳۔ آج کے زمانے میں حضرت محمدؐ کی بی بی ابراہیمؓ کی قبر کے پاس

۲۔ اس میں حضرت محمدؐ کی طرف سے کئی ایسی چیزیں آج کے سرگرمیوں  
ہمارے لئے لائی گئی ہیں کہ یہ پورا کون سا ہے جس اور دیکھیں گی وہ

محمدؐ کی قبر کے پاس

تکلیف دہی - علی رحمان صاحب مدظلہ العالی

اولاً قرآن میرضلاف حضرت علیؑ کی تفسیر ہے اور ثانیاً قرآن اور

بیان - اصغر انور خان صاحب لکھنؤ تفسیر قرآن مجید کا ترجمہ

1. - ڈاکٹر عبد الباقی صاحب لکھنؤ اور حضرت علیؑ کی تفسیر قرآن مجید

2. - مخلص مخلصیوں کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

3. - تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

4. - تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

5. - تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

6. - تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

7. - تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

8. - تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

9. - تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

10. - تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید اور ان کی تفسیر قرآن مجید

11

بیت ہجرت - - - - - میں صبر ذال

عزیز نے عزت نہ کر دیں کیونکہ اس نے میرے ساتھ القزاق  
میں رہا ہے۔ اور حالات خراب کرنے کی دھمکیاں بھی دی تھیں  
ان تمام باتوں کو اٹھ دیکھا جائے تو میری عزت دار آدمی اپنے عزیز  
میں اپنے لیے ایسا نہیں کر سکتا ہے

میں صبر نہ کر اس بات پر کہ میں صبر نہ کروں کیا کہہ دوں قسم کی  
بد اخلاقی اور بد تمیزی کرتے

ع. بقول ڈاکٹر مصدق ص 244: معاملات میں استقامت

میں نہ کہ عداوت کیوں کہ اس سے بھی مصدق نے بد تمیز اور  
بد اخلاقی کی تھی جس پر ڈاکٹر صاحب نے اسے منع کرنے اور سمجھانے کی  
کوشش کی تھی اور ایسے معاملات میں صحیح طور پر معاملات کو  
اس طور پر اخلاقی طور پر سمجھانے میں اور سمجھانے سے معاملات  
زیادہ اچھے ہوتے ہیں اور عزیز پر تفصیل میں سمجھانے میں

Amir Nawaz

صدر القزاق تنظیم



آئندہ شریکین کے خلاف ہمسایہ کے لئے ایک نوٹس لکھنا

بیان (ایک دفعہ ہی)

1۔ ڈاکٹر عبدالرحمان صاحب نے ہمسایہ کے لئے ایک نوٹس لکھا ہے جو شریکین کے خلاف ہے۔  
DHO صاحب کو نوٹس دیا ہے اور یہ نوٹس لکھا ہے کہ اس بارے میں کوئی کارروائی نہ

2۔ جی ہاں مجھے اس بارے میں علم ہے کہ جو شخص اپنے اپنے حق میں فیصلہ کرے گا  
میں اور قانون کا احترام نہ کریں اور دوسروں کی ذمہ داری سونپی ہے اور اگر کوئی  
شریکین کے خلاف کوئی کارروائی کرے گا تو اس میں ہر شریکین کو مدد ملے گی۔  
3۔ ڈاکٹر مذکورہ نے ہمسایہ کے لئے ایک نوٹس لکھا ہے جس میں لکھا ہے کہ

2۔ حقیقت یہ ہے کہ اگر کوئی شخص اپنے حقوق کا پورا احسان حاصل کیا تو اس کا حق D.H.O  
میں سے نہیں لیا جاتا اور لوگوں کے حق سے کوئی راجعہ سوائے عدالت میں نہیں کرنا اور  
ڈاکٹر صاحب نے یہ بھی لکھا ہے کہ اگر کوئی شخص اپنے حقوق کا پورا احسان حاصل کرے  
3۔ ڈاکٹر مذکورہ نے ہمسایہ کے لئے ایک نوٹس لکھا ہے جس میں لکھا ہے کہ اگر کوئی شخص اپنے

حق میں لیا جاتا ہے۔  
2۔ جی ہاں اس پر عدالت سوا علی رضوان صاحب الملک نے بھی نوٹس لکھا ہے جس میں لکھا ہے  
موجود نہ تھی لیکن جب میں نے دیکھا تو اسے لکھا ہے کہ اگر کوئی شخص اپنے حقوق کا پورا احسان حاصل کرے  
3۔ ڈاکٹر صاحب نے یہ بھی لکھا ہے کہ اگر کوئی شخص اپنے حقوق کا پورا احسان حاصل کرے

کرتی دھکی دے گی۔  
2۔ یہ ڈاکٹر صاحب نے یہ بھی لکھا ہے کہ اگر کوئی شخص اپنے حقوق کا پورا احسان حاصل کرے  
یہ یقین ہے کہ وہ صورت میں ہو سکتی ہے۔  
3۔ ہمسایہ کے خلاف کوئی نوٹس لکھنے کی دھمکی کا بھی الزام ہے لیکن یہ

یہ بات کہ ڈاکٹر صاحب نے یہ بھی لکھا ہے کہ اگر کوئی شخص اپنے حقوق کا پورا احسان حاصل کرے  
اس میں کوئی عجز نہیں ہے اس لئے کہ الزام ہے جسے لکھا ہے اور یہ سب

۱۸

۱۔ چشم پینے کے لئے اہم ہے کہ اسے لادیں اور اسے کھولیں۔

کہ دھکیں اور دیکھیں۔

۲۔ ۱۹۵۰ء کا اہل درست ہے اور اس کا وہ ہے جس نے اللہ سے تائب

اور اس سے دست بردار ہوئے ہیں اور اللہ سے تائب ہوئے ہیں

۱۔ آپ خرید لگی کینا طاعت ہیں۔

۲۔ طہریات میں سے اکثر عبادت تمام تر عبادت درست ہو رہے ہیں

اور اس میں کوئی عیب و انحراف نہیں ہے لہذا اس کا حکم کی ذمہ  
داران سے کہہ سکتے ہیں کہ ان کو کھارنا ہے

Nazakat/Kham  
دستی نذات خانہ اور اس میں  
لادیں اور کھائیں

۱۵-۶-۱۹

انکوائری بر خلاف عہدہ کفیل شیکٹ 30 ایچ یو سیکرٹری

بیان ڈاکٹر عبدالرحمن صاحب انجمن کفیل عہدہ کفیل ایچ یو سیکرٹری

- 1- آئی او، عہدہ کفیل شیکٹ، اعلان اید درخواست ڈی ایچ او صاحب کو سیکرٹری
- 2- یہ یاد رکھ کر درست یہ اور میں نے ایسی کچھ اور کوشش حتمی طور پر کی تھی لیکن یہ معاملہ حد سے باہر نہیں تھا تو محو اصرار، شغایات کی
- 3- آئی او، عہدہ کفیل شغایات میں کیا گیا تو بیان کرنا لیتا رہا
- 4- ہم شیکٹ، حکم عدولی کی تعمی اور عہدہ، ساتھ انتہائی بدتمیزانہ طریقوں سے
- 5- آئی او، جو شغایات ایچ ڈی درخواست میں کی گئی تھیں صحیح ہیں اور سیکرٹری

فاتحہ ہے

7- میں نے اپنے بیان پر بالکل قانع ہو گیا کیونکہ وقت ایچ روز میں منہ کی تبدیلی سنائی اور اب بھی وہاں اور بدتمیزانہ دیکھا گیا ہے اور اب شاف کو بھی دھکیا گیا ہے۔

8- کیا ہے اس بار میں مزید کہہ کر لیتا لیتا رہا ہے۔

9- میں نے تفصیلاً حالات ایچ ڈی درخواست میں لکھے ہیں البتہ اس حالات میں جنم پلا گواہ عبداللہ سویتیر اور علی رحمان (P.I.P.I) ہے جن پر ہمارے میں نے شکایت کی ہے اور عارضی طور پر علی رحمان کو دیکھنے کے لیے لیا گیا جو برافراقتی اسوں نے کیا ہے اس پر یہ نوڈ گواہ ہے اور ان سے اچھی جا سکتا ہے۔

مزید یہ کہ عارضی طور پر علی رحمان کو شکایت لکھی ہے اور اس کا جواب

۲۱

لجہ اور انداز سے اس کے منتقلی کے وقت کو نشان  
تعمیر و سلی شاہکیں لفظوں دو الفاظ کیونکہ اسکی اوقات اسکی سلی  
مزید یہ کہ منتقلی کے بارے میں منتقلی کے وقت میں ۵.۴۵ کو ڈوا لکھوں کا  
اور صیروں در خواست پر ۵.۴۵ میں اتفاقاً تریں کے میں نے صرف وقت  
کے بعد یہ حالات کی مشورہ کر کے اسکی شریعت سے اسکی وجہ اس اور  
قوانین کیا جاتا۔

اس مقام پر تفصیل بیان پیشوا سے اور تفصیلات کے نام سے  
یہی اگر ساروان عمل میں ہیں میں اسکی حالت اور اسکی  
صحت کے تعلق میں اسکی کو اسکی حالت اور اسکی  
صحت کے تعلق میں اسکی خلاف ساروان کی حالت اور اسکی  
بیان سے کیا جائے کیونکہ اس حالات میں اسکی اسکی بیان پر  
کافی کرنا ممکن نہیں ہے۔

Dr. S. S. Chohan  
Medical Officer  
Bha Chha Dist. Buner

D/A

20

OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER

No. 4197-4202 / 1

Dated Buner, the 15/06/2015



0939-510-138 | dhobuner@gmail.com | Fax-0939-510-138

OFFICE ORDER /conducting of enquiry

Reference this office No. 3051-33 dated 8-06-2015 is hereby withdrawn.

The following doctors attached to DHO office Buner will conduct the same inquiry, on the written request Mr. Hamsher Khan J/PHCT/Tech; MP BPS-09 attached to BHU Gagra (copy enclosed).

1. Dr. Abdul Wahid Coordinator CDC BPS-19
2. Dr. Lal Bacha Coordinator EPI BSP-17

They are hereby further directed to report to the undersigned within 03 days positively.

*[Signature]*  
District Health Officer

District Buner

15/06/2015

No. 4197-4202 / 1 / enquiry <sup>file</sup> Dated

Copy to:

1. The above named Doctors
2. Mr. Hamsher J/PHC
3. P/file
4. Acctt; /Estab
5. P/file

*[Signature]*  
District Health officer  
District Buner

P. File



**OFFICE OF THE  
DISTRICT HEALTH DEPARTMENT  
BUNER**

Office Ph I & Fax #: 0939 - 510138

21

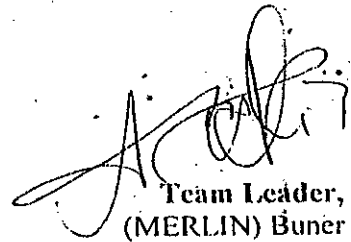


**Office Order: Transfer of Staff**

The following transfers have been made in connection with inquiry report for smooth operations of Department of Health Buner for the best interest of the public with immediate effect.

Sno.	Name	Designation	Current Location	New Location	Remarks
1	Najmunisa	LHV	BHU Dakoda	THQ Pacha	Based on inquiry report
2	Hamsher	JPHC MP	Tech BHU Gagra	BHU Charorai	Based on inquiry report
3	Muhammad Asif	JPHC MP	Tech BHU Charorai	BHU Gagra	Replacement of vice Sno. 2

You are directed to submit the arrival report to this office.

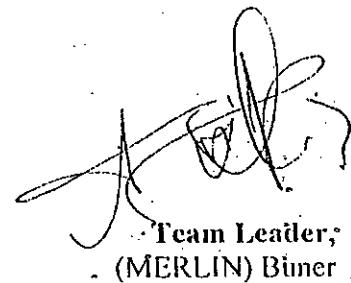
  
Team Leader,  
(MERLIN) Buner

No.: TL-BN/0705

Dated Daggar Buner the 16/7/2015.

CC:

- DC Buner
- DHO Buner
- MO Incharge concerned
- Hub Coordinator
- The above name officials

  
Team Leader,  
(MERLIN) Buner

(22)

From

Dr. Saeed ur Rahman M/O  
Incharge BHU Gagra

TO,

Hamsher J.M.T

Subject: Relived From Duty

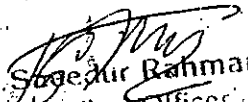
In Connection of Transfer Order  
No TL-BN/0705, Dated 16/07/2015  
You are relived from BHU Gagra, Dated  
25/07/2015 for Smooth operation  
of B.H.U Gagra

CC:

- Team Leader Merl'n Buner
- Hub Coordinator Merl'n

LD H.O Buner

The above name official

  
Dr. Saeed ur Rahman  
Medical Officer  
BHU Gagra Dist: Buner

25/07/01  
9 AM

Anexure B

23

OFFICE OF THE ASSISTANT COMMISSIONER HEALTH SERVICES AT BANGALORE

OFFICE ORDER

Mr. Hanumanth Medical Technician attached to  
Basic Health Unit Gogga, is hereby transferred and post  
to Civil Hospital Tumkur, on administrative grounds with  
immediate effect.

Original/Departure report should be submitted  
to this office for record.

ad/assistant  
COMMISSIONER HEALTH SERVICES  
AT BANGALORE

No. 4029-33/1-5 (Transfer)

Dated 18/11/2006

- 1.
- 2.
- 3.
- 4.
- 5.

Copy forwarded to:-

Mr. Hanumanth Medical Tech: BHT, Gogga for information  
and he is directed to report for duty to C.H. Tumkur immediately

The Medical Officer i/o BHT, Gogga and C.H. Tumkur.

Retired Section of this office.

The District Coordination Officer Tumkur.

The District Health Officer.

For information please.

*[Signature]*  
COMMISSIONER HEALTH SERVICES  
AT BANGALORE



24

OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH BUNER T. SARI.  
OFFICE ORDER/

With reference this office order No. 4029-33/7-3 (transfer) dated 19/8/2006, is hereby with drawn. Mr. Hansher Khan Medical technician attached to OH Totalai/BHU, Gagra is directed to perform duty at TBC Daggar, till further order, in the best interest of ICWS.

XXXXXXXXXX  
EXECUTIVE DISTRICT OFFICER  
HEALTH BUNER T. SARI

No. 5302-6 /FF

Dated 2/10/2006

Copy forwarded to:-

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

- The Medical Officer I/c C.H. TOTALAI/BHU GAGRA.
- The Medical Supdt: DHO; Hosp: Daggar.
- The Distt: Coordination Officer Buner.
- The Distt: Nazim Buner.
- The above named official.
- The Accts; Clerk of this office.

For information and necessary action.

CA  
Cancel this office order  
No. 4029-33-04 19/8/2006.

Mr Hansher MT will  
work at TBC Daggar  
till further order.

1  
m  
29/6

XXXXXXXXXX  
EXECUTIVE DISTRICT OFFICER  
Health Buner at sward

25

OFFICE OF THE EXECUTIVE DIRECTOR, HEALTH BUREAU AT BHARI.

OFFICE ORDER.

With reference this office order No. 5302-06/07 dated 2/10/2006, is hereby with drawn. Mr. Manan Khan Medical Technician attached to 789 at BHQ; Hosp: Daggur is directed to back report to his original post i.e BHU, Gagra in the best interest of public service. (No TA/DA is allowed)

Arrival/Departure report should be submitted to this office for record.

SA/XXXXXX  
EXECUTIVE DIRECTOR  
HEALTH BUREAU AT BHARI.

No. 6337-41 /07 (Medical Tech)

Dated 30/11/2006

Copy forwarded to:-

- 1.
- 2.
- 3.
- 4.
- 5.

- The Medical Supt: BHQ; Hosp: Daggur.
  - The Dr. Abdul Wahid focal person for 78 BHQ; (H) Daggur.
  - The Medical Officer i/c BHU, Gagra.
  - The above named official.
  - The Accountant of this office.
- For information and u/action.

*[Signature]*  
EXECUTIVE DIRECTOR  
HEALTH BUREAU AT BHARI.

26

FILE OF THE EXECUTIVE DISTRICT OFFICER HEALTH BUNER AT SWARTI.

OFFICE ORDER.

As discussed with the District Nazim Buner on 12/7/2008.  
This office order No. 3454-63 dated 8/7/2008 is partially  
Modified. Mr. Amir Nawaz J/PHCT(M.F) under transfer to DHC; Hospital  
Daggar is directed to perform his duty at BHU, Gagra and Mr. Hamsher  
J/PHCT(M.F) is hereby transfer to DHC; Hospital Daggar for further  
duty.

*Ok*  
EXECUTIVE DISTRICT OFFICER  
(HEALTH) BUNER AT SWARTI

Dated 12/07/2008

No. 3520-28

Copy to:-

1. The Nazim Buner.
  2. Distt:Coordination Officer Buner
  3. Mr. Abdul Matin Khan MHA
  4. MPAS PP-77,78 and 79 Buner.
  5. Medical Supdt:DHC; Hosp:Daggar Buner.
  6. Medical Officer I/c BHU.Gagra.
  7. The above named officials for complaine.
  8. Accts;/Estt; Section of this office.
  9. P/File.
- For information and c/action.

EXECUTIVE DISTRICT OFFICER  
(HEALTH) BUNER AT SWARTI

*ESTD*  
*considered*  
*to transfer order*  
*of Mr Hamsher M.F*  
*from Gagra to DHC hospital*  
*as reported by Mr. Amir Nawaz*

*14/7*

27

OFFICE OF THE EXECUTIVE DISTT:OFFICER HEALTH BUNER AT SWARI.  
OFFICE ORDER.

Reference this office order bearing No.3520-28 dated 12/7/2008, is hereby cancelled. Mr, Hamsher and Mr, Amir Nawaz J/FHCT(M.P) both are directed to perform their duty at BHU, Gagra.

*[Handwritten Signature]*  
EXECUTIVE DISTT:OFFICER  
(HEALTH) BUNER AT SWARI. *[Handwritten Mark]*

No. 3577/821

Dated 15/07/2008

Copy forwarded to:-

1. The Zilla Nazim Buner.
2. The Distt:Coordination Officer Buner.
3. Mr, Abdul Matin Khan MNA Buner.
4. Mr, Qasir Wali Khan MPA-PF-78 Buner.
5. The Medical Supdt:DHQ; Hosp:Daggar.
6. The Medical Officer I/c BHU, Gagra.
7. The above named officials.
8. Acctts;/Estt: Section of this office.
9. P/File.

For information and n/action.

*[Handwritten Signature]*  
EXECUTIVE DISTT:OFFICER  
(HEALTH) BUNER AT SWARI *[Handwritten Mark]*



28

**OFFICE OF THE  
DISTRICT HEALTH DEPARTMENT  
BUNER**

Office Ph & Fax No: 0939 - 510138

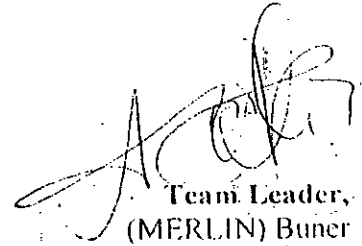
**MERLIN**

**Office Order: Transfer of Staff**

The following transfers have been made in connection with inquiry report for smooth operations of Department of Health Buner for the best interest of the public with immediate effect.

Sno.	Name	Designation	Current Location	New Location	Remarks
1	Najmunisa	LHV	BHU Dakoda	THQ Pacha	Based on inquiry report
2	Hamsher	JPHC MP	Tech BHU Gagra	BHU Charorai	Based on inquiry report
3	Muhammad Asif	JPHC MP	Tech BHU Charorai	BHU Gagra	Replacement of vice Sno. 2

You are directed to submit the arrival report to this office.

  
Team Leader,  
(MERLIN) Buner

No: TL-BN/0705

Dated Daggar Buner the 16/7 /2015.

CC:

- DC Buner
- DHO Buner
- MO Incharge concerned
- Hub Coordinator
- The above name officials

*Seen & checked.  
1/1/2015  
23/07/2015*

  
Team Leader,  
(MERLIN) Buner



(29)

**OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER**  
**Phone & Fax #: 0939-510138, Email: dhobuner@gmail.com**

No. 6226-35 / Dated the 31 / /07/2018  
**OFFICER ORDER / POSTING / TRANSFER.**

In the written statement/application in r/o Medical officer BPS-17 MO I/C BHU Gagra vide no.nil dated 27/07/2018 (copy attached)

The following posting/transfer of PHC Tech; MP BPS-12 is hereby order with immediate effect in the best interest of public service on administrative ground.

S#	Name	from	to	remark
1	Mr. Hamsher Khan	BHU Gagra	RHC Dewanababa	against the vacant post of Mr. Said Zarin Shah PHC/Tech; MP, due to long leave

Arrival/Departure report should be submitted to this office..

*District Health officer*  
**District Buner**

No

Dated/

/ /2018

Copy forwarded to;

1. Director General Health Services KPK Peshawar
2. Deputy Commissioner Buner for information
3. District Nazim Buner for information
4. MO I/C RHC Dewanababa
5. DAO Buner
6. IMU swat
7. I/C BHU Gagra
8. The above name official.
9. Acctt; estab; section
10. P/file

*District Health officer*  
**District Buner.**

30

**OFFICE OF THE DISTRICT HEALTH OFFICER, DISTRICT BUNER**

Phone & Fax # 0939-510138, Email: dhobuner@gmail.com



No. 8246-501

Dated the 1/04 /10/2018

**OFFICE ORDER:**

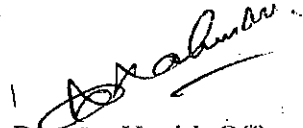
As approved by the Honorable Deputy Commissioner Buner office order

No. DC/(B)(E)E.A dated 03/10-2018.

The following officers/officials are hereby directed to report for duty with immediate effect in the best interest of service.

S#	Name	from	To
1	Dr. Nadir Khan I/CMO	BHU Gagra	BHU Cheena
2	Mr. Hamsher MT	-do-	RHC Dewanababa
3	Mr. Amir Nawaz MT	-do-	CD Amnawar

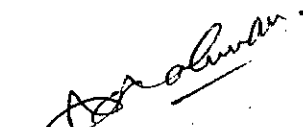
Arrival/departure report should be submitted to this office for record.

  
 District Health Officer  
 District Buner

No. /

Copy to;

1. Deputy Commissioner Buner for information
2. District Nazim Buner
3. Dr. Tariq Dy; DHO Buner
4. The above named officer/official
5. Account/Estab; section of this office
6. P/file

  
 District Health Officer  
 District Buner

31

GOVERNMENT OF KHYBER PAKHTUNKHAWA  
OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER  
Email: Dhobuner@gmail.com. Phone & Fax: 0939-510138



NO: 2184-92/PF

Dated: 18-07-2019

OFFICE ORDER.

The following posting / transfer of PHC Tech (MP) BS-12 with immediate effect in the interest of public.

S No	Name	From	To	Remarks
1	Mr. Hamser Khan PHC Tech: (MP), BPS-12,	BHU Gagra BD-6277	BHU Toorwarsak BD-6265, Vide ID Code NO:80025454	
2	Mr. Ghulam Raziq PHC Tech (MP) BPS-12	BHU Toorwarsak	BHU Gagra BD-6268 Vide ID Code NO:80025419	

Arrival /Departure report should be submitted to this office for record.

*[Signature]*

District Health Officer  
District Buner

Encl No & Dated Even:

- 1. District Account Officer Buner.
- 2. DDHO GMK for Information.
- 3. DDHO Daggar For Information.
- 4. IC BHU Toorwarsak for information.
- 5. IC BHU Gagra for information.
- 6. Acct/Esth Of this office.
- 7. The above named Official.
- 8. BHU Swat.
- 9. PAFIC.

*[Large Signature]*

*[Signature]*

District Health Officer  
District Buner

**ATTESTED**





2018

Gagra

Form Store Jobs/NWFP Routine 34

	Total Late		Casual Leave		Holidays		REMARKS
	Current month	To end of current month	Current month	To end of current month	Current month	To end of current month	
25							33
26							
27							
31							

33

*[Handwritten notes and scribbles on the left side of the page, including names like 'Neharika', 'Neha', and various illegible markings.]*

No. 1517 - 1

Dated Buner the, 17/6/1999.

From:-

The District Health Officer  
District Buner at Swari.

To:-

Mr. Hansher Khan Med:Tech:  
B.H.U. Wansar.

34

Subject:-

EXPLANATION.

Memo:-

It has come to my notice that you Absented yourself with out any prior information from an important duty of the field in First Round Sub-National Immunization Day. For this Negligence you are called upon to explain the reason. This shall also be reflected in your A.G.R.

Your Explanation must reach to this office with in 7 days otherwise strict disciplinary action will be taken against you.

DISTRICT HEALTH OFFICER  
DISTRICT BUNER AT SWARI

No. 1518 - 1

Copy forwarded to:-

1.

The Director General Health Services NWFP., Peshawar  
for information.

  
16/6/99

DISTRICT HEALTH OFFICER  
DISTRICT BUNER AT SWARI

No. 3058/

Dated 12/7/2006

From:-

The Executive (Distt.) Officer  
(Health) Buner at Swari.

35

To:-

1. Mr. Amir Nawaz Med. Tech: BNU, Gagra.
2. Mr. Huseber
3. Mrs. Sibtakat Khan LHV

Subject:-

WARNING

Re:-

Reference your reply to the explanation is not satisfactory, and based on last excuses. However you are hereby warned to be careful in future.

Moreover you are also directed to attend the office of the undersigned for personal hearing on any working day except HFD days.

*Jh*  
 EXECUTIVE DISTRICT OFFICER  
 HEALTH BUNER AT SWARI

No. 3058-61/

Copy forwarded to:-

1. The Medical Officer I/c BNU, Gagra for information please.
2. The Distt. Coordination Officer Buner.
3. The Distt. Magin Buner.

*Jh*  
 EXECUTIVE DISTRICT OFFICER  
 HEALTH BUNER AT SWARI

No. 3473-741

Dated 28/7/2006

36

From:- The Executive Distt: Officer  
(Health) Buner at Swari.

To:- 1. Dr. Saeed-ar-Rehman M.O BHU, Gagra.  
2. Mr. Hamsher Med: Tech: -de-

Subject:- ABSENCE FROM DUTY/EXPLANATION.

Memo:-

In continuation to this office letter No.2930 dated 4/7/2006, where in you were directed to explain your position on account of absence from duty, in this connection reply to the explanation received from your side and in light of reply you were warned to be care ful in future.

Moreover on 27/7/2006, at 9.00 AM during the Surparize visit to BHU, Gagra you are once again found absent from duty up to 9.00 AM, with out information/leave application.

You are once again directed to explain your position on account of absent from duty with in 03 days after the receipt of this letter, otherwise further action ~~to~~ will be taken against you under the rules.

*[Signature]*  
EXECUTIVE DISTT: OFFICER  
HEALTH BUNER AT SWARI

No. ~~3473-741~~

Copy forwarded to:-

1. The Director General Health Serv
2. The Distt: Coordination Office
3. Distt: Nazim Buner.

For information plea

*[Signature]*  
Executive Distt: Officer  
Health Buner

37

No. 3857  
From:-

*ERB*  
/Med:Tech:  
The Executive District Officer  
(Health) Buner at Swari.

Dated 12/8/2006

To:-  
Mr. Hamsher Khan  
Medical Tech: BHU, Gagra.

Subject:- WARNING/PERSONAL HEARING.

Memo:-  
Your reply of the explanation is not satisfactory and based on lame excuse. However you are hereby warned to be careful in future. moreover you are also directed to attend the office of the undersigned on any working day for personal hearing.

*of*  
EXECUTIVE DISTRICT OFFICER  
HEALTH BUNER AT SWARI

No \_\_\_\_\_ Polio Campaign

Dated 28/6 /2012.

From: The Executive District Officer  
Health District Buner

(38)

To: Mr/Miss/Mrs Rajmala K. P...

BHIC G...

Subject: Explanation/Warning/Suspended/charge sheet.

Memo:

As reported Amir Zahir  
by DHT D... Neglegence work

Satisfactory

You are hereby directed to explain your position within 5 days after the receiving of this letter. Failure to reply will be considered as second negligence, And strict disciplinary action will be taken against you:

The Executive District Officer

Health District Buner

2875-77

NO \_\_\_\_\_ /Copy to;

- 1. District Coordination Officer Buner
- 2. District Coordinator EPI/DSV
- 3. UPEC Chairman
- 4. Official Concerned

For Information and N/A

The Executive District Officer

Health Buner

officer

No:- 2938 / PF

Dated 29 / 5 / 2015

39

From;

District Health Officer  
District Buner.

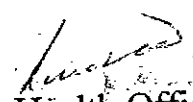
To,

Mr. Hamsher medical Technician  
BHU Gagra.

Subject:

Explanation

A written complaint has been submitted to the undersign copy attached by I/C of BHU Gagra which is self-explanatory.  
You are here by directed to submit your comment, within 3 days after receipt of this litter to proceed further as per roles regulation

  
District Health Officer  
District Buner

26



GOVERNMENT OF KHYBER PAKHTUNKHAWA  
OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER  
EMAIL: DHOBUNER@GMAIL.COM. PHONE & FAX: 0939-510138



Dated: 01 / 08 / 2019.

No: 2431-37 / Explanation / file

To,

Hamsher Khan  
PHC Tech (MP) BS-12

40

Subject: Explanation.

Memo,

During the surprise visit of the undersigned to BHU Torwarsak, on dated: 01-08-2019. you are found absent without any information / application to the undersigned and also not obeying this officer order: 8184-92, dated: 27-07-2019 till date. Therefore, you are hereby directed to explain your position within 3 days after the receipt of this letter. Otherwise strict disciplinary action will be taken against you under the (E&D) rules 2011.

District Health Officer  
Buner

Endst: No & Date Even.

Cc.

1. The Director General Health Services Khyber Pakhtunkhawa Peshawar.
2. The Deputy Commissioner Buner for information.
3. The Deputy District Health Officer GMK for information.
4. The account section of this office is directed to freeze pay from bank.
5. IMU Swat.
6. P/File

District Health Officer  
Buner

~~Amir Nawaz~~

Amir Nawaz

41

DEPARTMENTAL APPEAL AGAINST THE ORDER OF DHO BUNER

We have the honor to state that we have been transferred by the DHO Buner via Order bearing Serial No. 8245-50 dated 04.10.2018 to Mr. Amir Nawaz MT BS-14 and CD Amineer District Buner (copy attached) on the directions of Deputy Commissioner Buner.

It is further stated that (Dr. Nadar Khan BS-17 and Mr. Amir Nawaz MT BS-14) are the employees of Provincial Health Department and DHO Buner and DC Buner are not authorized for our transfer.

We therefore requested from your good self that the said orders of transfer of Dr. Nadar Khan BS-17 and Mr. Amir Nawaz MT BS-14 may kindly be cancelled as per request.

Thanking you as ever for

Yours Obediently

~~Dr. Nadar Khan~~  
for

Dr. Nadar Khan M.A. Jheraigo BS-17  
BHU Gagra (Buner)

Mr. Amir Nawaz, PHC Techn. MP BS-14  
BHU Gagra (Buner)

2/10/18

G.C. District Health Officer, Buner

*DHO Buner*  
*On what capacity*  
*you had been transferred*  
*Mr 17? you should have*  
*referred the case to DC/Buner?*

*[Signature]*  
9/8/2018  
Director General  
Health Services  
Khyber Pakhtunkhwa











ATTENDANCE ROLL FOR MONTH OF.....

JUNE

GSB DXP 517  
46  
20

(2)

Name																																Total Late		Cas			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current month	To end of current month	Current month			
1) Dg. Nubari Khan M.A. /c	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
2) Ahsan Niaz SMT	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N			
3) Mr. Amir Zeb Epi tech	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N			
4) Mr. Karam Khan Epi tech	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N			
5) Bader Shah Epi tech	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N			
6) Mr. Mansur Khan (Bislety)	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N			
7) Mr. Muhammad Iqbal (W. Indaki)	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N			
8) Mr. Banoor Khan (Chaukedy)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			
9) Mr. Hamid Khan M.T	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			
10) Miss. Muslima (Dab)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			

جولائی

ATTENDANCE ROLL FOR MONTH OF

July

12/7/2017

Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
1) Dr. Nadir Khan M/D Kc																															
2) Amir Nawaz SMT																															
3) Mr. Umar Zeb Epi Tech																															
4) Ikram ul Haq Epi Tech																															
5) Baidar Shah Epi Tech																															
6) Mr. Momtaz Khan (Biska)																															
7) Mr. Muhammad Iqbal (L.oddali)																															
8) Mr. Jamroz Khan (Chawkehar)																															
9) Mr. Hamzah Khan (M.T)																															
10) Miss Muslima (Dain)																															
11) Ghulam Raza (MT)																															

Total Late  
Current month  
To end of current month  
**47**





BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Appeal No.1121/2018

Hamsher Khan..... Appellant

Versus

District Health Officer Buner and others ..... Respondents

**INDEX**

S.No.	Description of documents.	Annexure	Pages.
1.	Rejoinder.		1-10
2.	Affidavit.		11
3.	Copy of application for disciplinary action.	A	12
4.	Copy of part of inquiry 2015	B	13
5.	Copy of statement/ questionnaire by Dr.Saeed ur Rehman of inquiry 2015	C	14-15
6.	Copy of recommendation of inquiry 2015	D	16
7.	Copy of transfer order to Charorai dated 16.07.2015 under Inquiry 2015	E	17
8.	Copy of demand of Medical Superintendent and order dated 05.08.2015 to DHQ Hospital Daggar	F	18-19
9.	Copy of Article 13 of the Constitution of Pakistan, 1973 regarding double punishment	G	20-21
10.	Copy of comments of DHO dt.21.12.2018	H	22-23
11.	Copy of comments to DG Health KPK	I	24
12.	Copy of list of staff of BHU Gagra which indicate the original post of appellant.	J	25
13.	Copy of office order dated 19.06.2019 regarding cancellation of general duties by D.C. Buner	K	26
14.	Copy of office order dated 23.06.2018 regarding relieving of appellant from DHQ Daggar	L	27
15.	Copy of written statement which denied by MO Incharge BHU Gagra by DHO Health Buner.	M	28
16.	Copy of charge report dated 27.06.2018 which was allowed by DHO Buner after refusal of MO Gagra	N	29
17.	Copy of application to DHO District Buner regarding locking of attendance register.	O	30-33
18.	Copy of letter dated 07.09.2018 issued by DHO health Buner regarding attendance register.	P	34
19.	Copy of the inquiry filed by the appellant dated 03.10.2018 to D.C. Buner	Q	35-39

put up to the court with  
relevant app.

Reader

11/1/2020

20.	Copy of transfer orders dated 04.10.2018 in the result of inquiry by D.C. Buner.	R	40
21.	Copy of departmental appeal of Dr.Nadir Khan and Amir Nawaz SMT	S	41
22.	Copy of freezed transfer order of Mr.Amir Nawaz SMT	T	42
23.	Copy of letter from DHO Health Buner to D.G. Health KPK regarding defaulters.	U	43
24.	Copy of Draft Charge Sheet by D.G Health.	V	44
25.	Copy of application to D.C. Buner by appellatnt dt.12.07.2018	W	45-47
26.	Copy of transfer order of appellatnt to RHC Dewana Baba	X	48-52
27.	Copy of office order dated 18.02.2019 regarding appellatnt's attendance in register by DHO Health	Y	53-54
28.	Copy of complaint to DHO Health Daggarr by appellatnt against M.O. Incharge BHU Gagra Dr.Nadir.	Z	55-56
29.	Copy of release of pay by DHO to HBL	Z/1	57
30.	Copy of impugned office/ transfer order dated 18.07.2019	Z/2	58

Appellant-in-Person

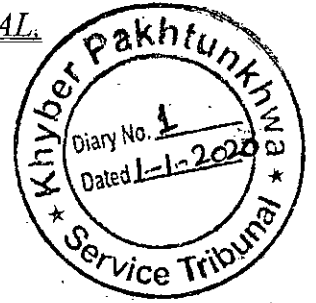
*Ham*

Hamsher Khan

Dated:

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR



Service Appeal No.1121/2018

Hamsher Khan..... Appellant

Versus

District Health Officer Buner and others ..... Respondents

REJOINDER ON BEHALF OF APPELLANT  
TO THE COMMENTS FILED BY  
RESPONDENTS.

Rejoinder on behalf of appellant as under:

*Respectfully Sheweth;*

Preliminary objections:

- 1) Para No.1 of preliminary objections is incorrect, hence denied that petitioner has got cause of action and locus standi to file the instant appeal.
- 2) Para No.2 is also incorrect. The petitioner has come to this Hon'ble Tribunal with clean hands.
- 3) Para No.3 is also incorrect, hence denied.
- 4) Para No.4 is incorrect, hence denied and nothing has been concealed from this Hon'ble Tribunal. Moreover the appeal is maintainable and is within time.
- 5) Para No.5 is incorrect, hence denied.

REPLY ON FACTS:

1) (i) That Para No.1 of appeal is correct while the comments of respondents is incorrect, hence denied. The inquiry launched on 29.05.2015 against the appellant was totally unfair, baseless stories, unjustified facts and a death of moral values. The five points raised by the then Medical Officer Dr.Saeed ur Rehman at that time were not more than joke. It is quite clear from the statements of the Medical Officer that he felt terror and fear in future and if excellency notice, you will come to know that he did not mention any complaint in real which the petitioner did in his complaint application on 29.05.2015, therefore, the five points raised by him do not have any existence in reality. (Annexure "A").

(ii) In the inquiry the then Medical Officer BHU Gagra did not prove the allegations of moral misconduct as the appellant have requested the inquiry officers as well as the Medical Officer concerned to bring even a single evidence of moral misbehaviour with female staff (LHWs) or community fellows but unfortunately the inquiry officers were not focusing on the main subject of moral conductivity and DHO Buner played one sided game.

My lord, actually they played with extra players (staff members) whose were under his influence because the whole staff members told different stories but no statement could prove the allegations and charges of moral misbehaviour. (Annexure "B and C").

iii) My lord if your excellency further notice the recommendation of the inquiry dated 29.05.2015 clearly showed that the Medical Officer Incharge BHU Gagra Dr.Saeed ur Rehman and Hamsher Khan MT will both be transferred from BHU Gagra but the then DHO Health Buner issued transfer order of appellant instead of both which was an example of injustice, violation of merit and unlawful exercise by DHO (H) Buner. (Annexure "D").

(iv) In light of inquiry the appellant was transferred to BHU Charorai on 29.05.2015. Meanwhile M.S. DHQ Daggar demanded the appellant from DHO Buner on 05.08.2015 in respect of good service record of appellant. Therefore, in response of the demand of M.S. DHQ Daggar DHO Buner issued order of appellant on the same date (05.08.2015) to DHQ Daggar Buner, therefore, the appellant obeyed his officer and followed as they instructed. (Annexure "E and F").

(v) My lord in the constitution of Pakistan 1973, Article 13 give protection against double punishment and self-incrimination which is well defined.

As appellant was transferred unfairly and unjustly. In light of that inquiry under punishment once, therefore, the issues which related with the previous inquiry is useless to discuss and bring under consideration or join the link of mentioned inquiry with the current petition of appellant. (Annexure "G").

2) (i) That para No.2 of the comments is incorrect, while para No.2 of the appeal is correct. Service career of the appellant is consist of more than twenty years i.e. 1989 and out of the inquiry period upto 29.05.2015 nearly sixteen years no one can produce even a single explanation against the appellant.

(ii) The transfer under the inquiry dated 29.05.2015 was really based on DHO (H) Buner self-interest as mentioned in the inquiry recommendation, if both were recommended for transfer then why DHO (H) Buner issued transfer order of the appellant. It was really an example of favoritism and was act of injustice and against merit by DHO (H) with a poor person like the appellant.

(iii) My Lord, transfer and posting always remained a part service for any person it is not necessary if anybody is transferred to any anywhere he will be transferred under report but it is possible that he might be transferred for some other reason too. Similarly the

appellant was transferred to DHQ Hospital twice, one on the demand of the then T.B. Coordinator Dr.Abdul Wahid to assist him in T.B. dots program and second time on the demand of M.S. DHQ Daggar per record. As an obedient servant the appellant followed the orders. So the remarks about the appellant of non-cooperation is the creation of his own mind and personal interest.

My lord the appellant may kindly bring the remarks of DHO (Buner) which he gave in the current case to DG (H) KP Reference Letter No.9016 and 9017 on dated 21.12.2018. The comments submitted by DHO (H) Buner to honourable court shows his double standard fake nature and hypocrisy. (Annexure "H and I").

- 3) In reply to para-3 it is submitted that the appellant worked as a Medical Technician at BHU Gagra on original post under DHO Buner. Appellant was appointed on general duty at DHQ Hospital Daggar on the demand of M.S Daggar Reference letter No.DHO/merlin/01/15 dated 05.08.2015 as mentioned. (Annexure "J")
- (i) My lord the statement in para-3 is totally wrong. All kind of general duties were cancelled by DHO Health Buner Reference letter No.2815-20 dated 19.06.2018 and were ordered to report on original post within 3 days. (Annexure "K").
- (ii) As original post of appellant is at BHU Gagra so that the M.S. DHQ Daggar relieved the appellant on 23.06.2018 to report on original post at BHU Gagra. (Annexure "L").

Appellant obeyed the orders of DHO Health Buner and M.S. DHQ Daggar and reached at BHU Gagra to submit the arrival in due time. Unfortunately the medical officer BHU Gagra Dr.Nadir Khan refused to accept the arrival of appellant without mentioning any solid reason in this regard, he also gave an advice to remain in home for 3 to 4 days and wait till

the cancellation of the order which the appellant brought. Moreover, the appellant have no experience of working relationship with Dr.Nadir Khan before even a minute time.

- (iii) Appellant shared the whole story with DHO Health and he instructed him in "written form" to accept the arrival report of Hamsher Khan immediately but Dr.Nadir Khan once more rejected the written statement of DHO Buner and the next day, he left for Karachi or somewhere else. (Annexure "M").
- (iv) On the refusal to accept the written statement of DHO Health Buner for accepting arrival report, appellant visited once DHO Health Buner Office, looking to the sensitivity of matter DHO health Buner directly accept the arrival report of appellant at BHU Gagra but it is strange to say that the DHO (H) Buner did not call any explanation against Dr.Nadir Khan for his violation. (Annexure "N").

My Excellency. In the absence of Dr.Nadir Khan and after a telephonic conversation with him the appellant was able to enlist the name of appellant in the attendance register on 27.06.2018 per having proper order. The appellant marked his daily attendance upto 01.07.2018.

- (v) On his arrival from Karachi or somewhere else he prevented the appellant to mark the daily attendance and locked the attendance register in his office and ordered not to allow the appellant in his office so the register remained locked for upto date and the matter is still handing from 19.06.2018. Appellant wrote an application No.992 on 17.12.2018 and 09.08.2018 to DHO Health Buner to resolve the issue of attendance register but the DHO Health Buner did not make a single visit upto date to BHU Gagra in this critical issue. Moreover, appellant also gave application to A.C and Nazim-e-Ala Buner concerning the same issue. The issue was also



raised by IMU but the efforts of appellant did not bear any fruit. (Annexure "O").

- (vi) After getting disappointed from all sources the appellant put the complaint on K.P. Portal regarding attendance register on dated 07.09.2018. In the result of the complaint to DHO Buner released an order No.6932 dated 07.09.2018 in my favour regarding attendance register and in the order Dr.Nadir Khan was directed to give the register to Mr.Hamsher Khan M.T. for daily attendance but he decided not to follow the order of DHO Health Buner as before but DHO Health Buner did not follow up and implement his order and to take action against the Medical Officer BHU Gagra. (Annexure "P").
- (vii) Finally the appellant filed an inquiry against Dr.Nadir Khan, Mr.Amir Nawaz SMT and Ali Rehman in the court of D.C. Buner office on 12.07.2018. (Annexure "Q").
- (viii) In the result of the inquiry the medical officer Incharge Dr.Nadir Khan and Amir Nawaz SMT were declared guilty and all the charges against them were proved per record. In the light the inquiry Dr.Nadir Khan was transferred to BHU Cheena while Mr.Amir Nawaz (SMT) was transferred to C.D. Amnawar but my transfer was made to RHC Dewana Baba which was against the merit and law because the appellant was an applicant and was following all the orders till date. Being an applicant the appellant also submitted an appeal against transfer of appellant to RHC Dewana Baba. (Annexure "R").
- (ix) The medical officer Dr.Nadir Khan and Amir Nawaz SMT also submitted an appeal against their transfer orders. They claimed in their appeal that DHO Buner has no power to transfer them but they did not appeal against their charges under which they were transferred. It means that they are still

guilty and did not prove themselves innocent. Because in their appeal they only challenged the power of DHO Health Buner and D.C. Buner that they have no power to transfer them. the DHO Health Buner cancelled the transfer order of Medical Officer Dr.Nadir Khan after getting instructions from D.G. Health KPK under the issue of DHO Health Buner powers, therefore, the issue of his transfer is still awaited and must use a proper forum which have the power of his transfer. (Annexure "S").

- (x) In the same inquiry Mr.Amir Nawaz SMT BHU Gagra was charged on the ground of solid proof and was transferred to C.D. Amnawar. As appellant mentioned that his appeal against his transfer case was not accepted by D.G. Health K.P. Peshawar but his transfer order has been frozen till further orders due to political interference by DHO Health Buner.

My lord this kind of illegal practice of DHO (H) Buner may be notice and his frozen transfer order must be rescheduled and active against a proper station equivalent to his scale BPS-14. (Annexure "T").

Being an applicant the appellant also appealed against transfer of appellant to D.G. Health KPK. Luckily the appeal was accepted by D.G. Health KPK in favour of appellant. In the light appeal of appellant the D.G. Health Services K.P. directed DHO Health Buner to take action against defaulter i.e. Dr.Nadir Khan Incharge BHU Gagra and Amir Nawaz SMT BHU Gagra reference letter No.137 dated 27.03.2019 but unfortunately the DHO Health does not implement the order till date. In Reference of D.G. Health letter No.1933 DHO Health did not take any action by himself but sent a letter No.137 dated 27.03.2019 to D.G. Health K.P. to take action against the defaulters.

Moreover, Dr.Nadir and Amir Nawaz (SMT) were charge sheeted Reference No.8257 on 30.04.2019 but upto date DHO (H) Buner did not prepare Draft Charge Sheet against them under E&D Rules. The point must not be ignored. (Annexure "U and V").

- 4) That para No.4 is incorrect. Deputy Commissioner is the head of steering committee of all departments. That's why the appellant filed the inquiry in his forum. As DHO (H) Buner was angry with the appellant so he issued transfer order to RHC Diwana Baba then the appellant requested DHO (H) Buner that the appellant actually struggling to endorse your orders then why you transferred the appellant to Diwana Baba

Moreover, the order issued by DHO (H) Buner was occurred on 31.07.2018 while the appellant filed the 12.07.2016, therefore, the transfer order during inquiry was objectionable and against the rules. So the appellant never demand to give charge of LHWs from the medical officer BHU Gagra. Appellant never threatened medical officer BHU Gagra for serious consequences because the appellant never discussed the issues of LHWs with him. (Annexure "W & X").

My Lord in the response of transfer order to RHC Diwana Baba by DHO (H) appellant wrote an application DHO (H) Buner on 02.08.2018 for cancellation (attached) after the retirement of DHO (H) Sher Muhammad. The DHO (H) Buner agreed with the application of appellant and he retained transfer order of appellant to BHU Gagra on the original post through order No.6411-14dated 06.08.2018.

- 5) During the leave tenure of Dr.Nadir the appellant did not start marking attendance by the appellant, appellant have started marking attendance due to proper order No.622-24 dated 18.02.2019 in the presence of Dr.Sajjad Medical Officer who was performing in the absence of Dr.Nadir Khan therefore, the allegations of DHO (H)

Buner in para-5 is his ignorance towards his office record. (Annexure "Y").

- 6) Para-6 is incorrect, hence denied. DHO (H) Buner always proved himself "Alladin ka charagh" because he at once acts upon the complaint of medical officer but he ignored written complaint of the appellant dated 12.06.2019 the appellant crying for justice for the last two years. Why the DHO (H) Buner always solve their problems with the transfer of appellant. Before transferring the appellant to BHU Towarsak he should have called as well called explanation from the appellant or personal hearing. Why DHO Health Buner does take action of complaint of appellant earlier before the transfer of appellant. My lord this is exactly a point must be noted. (Annexure "Z").
- 7) The statements of DHQ (H) Buner is not matching with his words. The appellant is a dutiful servant. Appellant is wandering for justice which you could not provide yet, but the appellant have confidence on hon'ble court to justify the matter.
- 8) My Excellency, the appellant burn for only transferring the appellant have already explained his position in this connection. He never called Medical Officer BHU Gagra for personal hearing because in the response of my complaint he never informed the appellant about the matter and progress of personal hearing of Medical Officer Dr.Nadir Khan. As the appellant performing in BHU Gagra and upto date they do not allow me the attendance register and upto date from the beginning of case of appellant DHO (H) Buner never visited BHU Gagra yet and he never called any explanation from the defaulters. It shows how irresponsible DHO (H) Buner is? Appellant is receiving salary not by unfair means but receiving the salary by their own DHO (H) Buner order Reference No.5626 dated 22.11.2019. So they are continuously telling a lie and wasting the precious time of Hon'ble Court. (Annexure "Z/1").

In the light of the above proofs and evidence the order on 18.07.2019 to BHU Torwarsak is based on dishonesty and malafide. (Annexure "Z/2").

It is, therefore, requested that on acceptance of this Rejoinder the appeal filed by the appellant may kindly be accepted and this Hon'ble Tribunal may be pleased to:

- i) Cancel the transfer order dated 18.07.2019 to Torwarsak.
- ii) Direct the DHO Health Buner to take action and prepare the "Draft Charge Sheet" against the defaulters under E&D Rules.
- iii) Allow the appellant to mark attendance during the period when the register was locked for the appellant.

Appellant-in-Person



Hamsher Khan

Dated:

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No.1121/2018

Hamsher Khan..... Appellant

Versus

District Health Officer Buner and others ..... Respondents

AFFIDAVIT

I, Hamsher Khan son of Hakeem Khan R/o Bakra, Kalpani, Tehsil Daggar District Buner do hereby affirm and declare on oath that the contents of the accompanying **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



*Hansher*  
Deponent  
CNIC No.15101-5862253-7

*9-1-2020*

Annex  
"A"

12

Office of the MO/IC BHU Gagra distt Buner.

To,

Annex "A"

12

District Health Officer Buner.  
Team leader Merlin Buner.

Subject, Request for disciplinary action on Bad conduct, misbehavior, disobedience and threats of MT Hamsher of BHU Gagra district Buner . .

Sir,

It is to state that the above subjected official was found involved in some suspicious activities of bad conduct since long, evident by my own daily observation, community complaint and repeated verbal reports of BHU staff, which cannot be explained at this level due to some traditional reasons of deserved and religious community.

Being MO/IC the said above official was called and advised sympathetically at my office in privacy and in detail with the evidences in my knowledge, he was advised to leave up these bad conduct and unaffordable activities/behavior.

But in response of the above proper correspondence what he did is that, he went out of control and replied as a mad person and threaten me as follows.

- "I will do everything which I would like and no one can forbid me and cannot change my present working position and I know each thing what is good and what is bad.
- I will blame you in community that you are abusing me to provide some female to you.
- I will hurt myself for getting self induced fracture of bone and will register FIR in police department against you.
- I will arrange a press conference and will blame your involvement in sexual harassment.
- I will create law and order situation in the BHU and will not allow you to perform your duties"

It is further added that during talking his language was extremely harsh and his body language was full of terror. which shows the severity of the matter.

Respected Sir,

It was too shocking for me as I was in sympathy with him and such a reaction was out of my expectation from him and which cleared my mind further to the root cause of his involvement and his bad conduct.

Refusal from changing his present working position (as trainer to Lady Health Workers) is another evidence of his concerns. Further detail is not good as I have mentioned above.

Han  
ATTESTED

Annex  
"B" 13

(11)

To

The district health officer, respectable inquiry officers distt: Buner.

Subject: Why a disciplinary action must be taken against me in the light of the following arguments.

Dear Sir,

I am much thankful and great full that you have given me a chance to submit more evidence in the form of documents with in three days to explain the points more in details in self-defense, respectable sir before going to discuss the five points raised by the concerned medical officer in the complaint letter, I wish to inform you about the earlier position and conversation which took place between both of us in a closed room on 29/04/2015. There were no other company to explain the exact position and conversation which occurred in a closed room, therefore the remarks made by other officials are incomplete or scripted them advisedly. Moreover some political issues cannot be ignore in this sensitive matter.

According to the medical officer BHU Gagra, if I were involved in suspicious activities as he mentioned then why he did not inform your kind office by letter to take action against me. In my little knowledge there is no such a single public complaint against me recommended by the medical officer concerned as per previous record, as I have no deal with public OPD or pharmacy, therefore the question of public complaint remain rootless.

- 1) Dear Sir, if you notice in the beginning of the complaint letter the writer produced some extra suspense and potential to attract the attention of audience is completely false and extra effort, in the paragraph he used the word (observation). Observation mean a thing which remain under process but yet not produces truth or false so the status of an individual can not be measured with observation. It is just the creation of individual's mind about any body. More over I am not agree with the charge he marked until and unless he does not explain in open circumstances. I shall wellcome him if he pointed out the nominations for which he blamed me without bringing traditional and religious issues in mind. Sir, without bringing all these suspicious activities to open table, any kind of action against me will be consider injustice in my point of views.

*Handwritten signature*  
ATTESTED



(36)

Annex  
"C"

Annex  
14

From,

1. Dr. Abdul Wahid CDC BPS-19 inquiry officer
2. Dr. Lal Bacha EPI Coordinator BPS-17 inquiry officer

Subject:-

STATEMENT/ QUESTIONNAIRE TAKEN FROM MO I/C DR. SAEED-UR-REHMAN BHU GAGRA

Memo,

Question No.1. Do you accept us as inquiry officer in the inquiry to be conducted on your complaint against the M.T Mr. Hamsher? (Copy attached)

yes

Question No.2. Is it right that the complaint submitted by you? (Copy attached)

yes

Question No.3. do you accept that the charges leveled by <sup>you</sup> against the M.T Mr. Hamsher are 4 in No..?

Question No.4 From what date the person under complaint is working under your supervision &/on the present post?

~~He is working for since long, But~~  
I observed him during newly recruited LHWs training and remain under my complaint when 15-20 days passed of starting the training.

PTO

Ham

ATTESTED

Question no.5 Have you called any explanation from the person before this complaint in connection of such charges or any others charges?

No any explanation has been called  
But verbally advise has been given <sup>two times</sup> for  
Correction his behavior.

Question.6. Have you informed the competent authority from such charges or any other charges labeled against the person before this? If any, submit to the inquiry officer.

The district health officer has been informed verbally during his visit of this unit in month of May 2015. And written Complaint submitted on 29.5.2015.

Question .7. Is this complaint submitted by you, sufficient or otherwise?

Yes it sufficient, But I can provide witnesses in behalf of his misbehavior and Misconduct of Mr. Housler

Question 8. Submit any relevant documents in the support of your complaint to the inquiry officers?

Yes, it is already submitted to you.

*[Signature]*

Dr. Abdul Wahid CDC  
BPS-19 inquiry officer

*[Signature]*  
Dr. Saqibur Rahman  
The Medical Officer  
U-4 Gagra Distt. Euner

*[Signature]*

Dr. Lal Bacha EPI  
Coordinator BPS-17 inquiry officer

*[Signature]*  
ATTESTED

Annex ③  
"D" 16

blamed on MT by I/C. for which the Dr. I/C says that Mr. Ali Rehman is the witness of the situation. While MT Hamsher insist that Miss-conduct & Miss-behavior should be proved by doctor properly.

9. The I.C has not called any explanation from the MT hamsher before in any matter neither in this matter nor has informed the DHO Office Buner.
10. Statement of doctor & MT reveal, that there is some miss understanding on teaching matter to LHWs among Doctors & MT. for which the resolution & opinion of LHW coordinator is must.

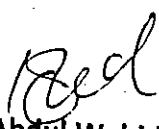
AS  
Recommendation ;

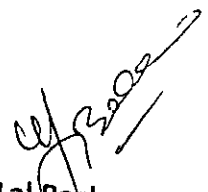
1. The LHW Coordinator NP ought not to give the responsibilities of teaching to LHW by Mr. Hamsher in this facility & other MT without permission of DHO & LHW coordinator.
2. It seems to be difficult for I/C Dr, Saeed-ur-Rehman & Mr. Hamsher MT BHU Gagra to work together in the same H/Facility, it is better to transfer both or any one of them for the smooth running of the H/Facility.

OR

Any decision by the competent authority DHO Buner will be appreciated in this regard.

Enquiry officers.

  
Dr Abdul Wahid  
CDC Coordinator  
DHO Office Buner

  
Dr Lal Bacha  
Coordinatot EPI  
DHO Office Buner

  
ATTESTED

Annex  
"E"  
17



OFFICE OF THE  
DISTRICT HEALTH DEPARTMENT  
BUNER

Office Ph. & Fax No. 0939 - 510138



Office Order: Transfer of Staff

The following transfers have been made in connection with inquiry report for smooth operations of Department of Health Buner for the best interest of the public with immediate effect.

Sno.	Name	Designation	Current Location	New Location	Remarks
1	Najmunisa	LHV	BHU Dakoda	THQ Pacha	Based on inquiry report
2	Hamsheer	JPHC MP	BHU Gagra	BHU Charorai	Based on inquiry report
3	Muhammad Asif	JPHC MP	BHU Charorai	BHU Gagra	Replacement of vice Sno. 2

You are directed to submit the arrival report to this office.

Team Leader,  
(MERLIN) Buner

No. HL-BUN/0.705

Dated Daggar Buner the 16/7/2015.

CC:

- DC Buner
- DHO Buner
- MO Incharge concerned
- Hub Coordinator
- The above name officials

Team Leader,  
(MERLIN) Buner

ATTESTED

FR 45

Annex  
"F" (18)

**OFFICE OF THE TEAM LEADER MERLIN, BUNER**

NO DHQ/MT/01/15

DATED 05/08/2015.

TO

The Medical Superintendent  
DHQ Hospital, Daggar

SUBJECT: Application for accepting the Arrival Letter.

Memo:

Sir:

In response to your demand, we are hereby arranging the services of Mr. Hamsher (MT) at DHQ Hospital Daggar, for smooth running of the facility. It is kindly requested that accept the arrival report of said personnel please.

Please find the attached document.

*[Signature]*  
Merlin DHQ office

Buner..

*Accepted  
Arrival letter in capacity*

*[Signature]*  
Medical Superintendent  
Dist. Head Quarter Hospital  
Daggar Buner

*[Signature]*  
ATTESTED

A-E

19

Outlook Web App

Type here to search Entire Mailbox [Search Icon] [Print Icon] [Options Icon] Sign out

- Mail
  - Calendar
  - Contacts
  - Deleted Items
  - Drafts [36]
  - Inbox
  - Junk E-Mail
  - Sent Items
- Click to view all folders
- Manage Folders...

Reply
 Reply All
 Forward
 X
 Junk
 Close

**RE:**  
 Pakistan- M&E (Buner)  
**Sent:** Wednesday, August 05, 2015 7:02 AM  
**To:** Pakistan- HR Assistant (Buner)  
**Cc:** Pakistan- Deputy Technical (Buner); Pakistan- Pharmacy (Buner DHQ)

Dear HR,  
 I think we shall place Mr. Hamsher MT to cover the need for time being. Kindly do the needful

Regards,  
 Asif

-----Original Message-----

**From:** Pakistan- Pharmacy (Buner DHQ)  
**Sent:** Wednesday, August 05, 2015 10:11 AM  
**To:** Pakistan- M&E (Buner) <me.buner@merlin-pakistan.org>  
**Cc:** Pakistan- HR Assistant (Buner) <hra.buner@merlin-pakistan.org>; Pakistan- Deputy Technical (Buner) <dt.buner@merlin-pakistan.org>  
**Subject:**

the attached letter from MS show the need of staff in DHQ Hospital daggar. MP tech is much important so if, possible, please arrange MP technician from any other health facility.

Regards,  
 Mushtaq Mphil Pharmacology

*Ham*  
**ATTESTED**



**Article: 13 Protection against double punishment and self-incrimination**

**13. Protection against double punishment and self incrimination.-No person-**

- (a) shall be prosecuted or punished for the same offence more than once; or
- (b) shall, when accused of an offence, be compelled to be a witness against himself

**Footnotes:**

**Comparative Table of Article 13 of the Constitution of Pakistan, 1973**

**Constitution of Pakistan 1962 :**

—

**Constitution of Pakistan 1956 :**

—

**Constitution of India 1950:**

20(2)(3)

**Government of India Act 1935:**

—

**Leading & Latest Cases on Article 13 of the Constitution of Pakistan, 1973 :**

**Search**

**Month wise Posts**

**Constitution and Amendments**

- >>>News and Updates
- >>>Protect the Constitution of Pakistan
- >Pakistan Constitution
- >01st Amendment 1974
- >02nd Amendment 1974
- >03rd Amendment 1975
- >04th Amendment 1975
- >05th Amendment 1976
- >06th Amendment 1976
- >07th Amendment 1977
- >08th Amendment 1985
- >09th Amendment Bill
- >10th Amendment 1987
- >11th Amendment Bill
- >12th Amendment 1991
- >13th Amendment 1997
- >14th Amendment 1997
- >15th Amendment Bill
- >16th Amendment 1993

*Handwritten signature*  
**ATTESTED**

21



### Leading & Latest Cases on Article 13 of the Constitution of Pakistan, 1973 :

P L D 1978 SC 121	ALAMDAR HUSSAIN SHAH	ABDUL BASEER QURESHI AND OTHERS
1989 MLD 2649	HABIBULLAH	STATE
P L D 1998 SC 1445	MEHRAM ALI AND OTHERS	FEDERATION OF PAKISTAN AND OTHERS
2005 SCMR 1340	THE STATE THROUGH COLLECTOR OF CUSTOMS	MAEDULELLE MANDLENKOSI JEROM
2005 SCMR 1617	ABDUL HAMEED AND OTHERS	MEMBER (REVENUE), BOARD OF REVENUE AND OTHERS
P L D 2005 QUETTA 1	ASHFAQ KHALID	THE STATE
P L D 2006 SC 365	ABDUL MALIK AND OTHERS	THE STATE AND OTHERS
2004 SCMR 819	ABDUL HAQ	MUHAMMAD AMIN ALIAS MANNA AND OTHERS

- » 11th Amendment Bill
- » 12th Amendment 1991
- » 13th Amendment 1997
- » 14th Amendment 1997
- » 15th Amendment Bill
- » 16th Amendment 1999
- » 17th Amendment 2003
- » 18th Amendment 2010
- » 19th Amendment 2011
- » 20th Amendment 2012
- » 21st Amendment 2015
- » 22nd Amendment 2016
- » 23rd Amendment 2017
- » 24th Amendment 2017
- » 25 th Amendment 2018
- » 25-Pres.Orders: 2007
- » 26-Pres. Orders: 77 to 06
- » 27-Comparative Table
- » 28-Quaid's address
- » 29-Objectives Resolution
- » 30-Legislative History
- » 31-Articles by Zain Sheikh
- » 32-Book

### Important Statutes and Recent Judgments

- » 0001- Recent Judgments
- » 001- The Contempt of Court Ordinance, 2003
- » 01- The Supreme Court Rules, 1930
- » 02- Income Tax Ordinance, 2001
- » 03- The Sales Tax Act, 1990
- » 04- Federal Excise Act, 2005
- » 05-The Diplomatic and Consular Privileges Act, 1972
- » 06-The Vienna Convention on Consular Relations, 1963
- » 07-Vienna Convention on Diplomatic Relations, 1961
- » 08-The Pakistan Penal Code, 1860 Part I
- » 09- The Pakistan Penal Code, 1860 Part II
- » 10-The Code of Criminal Procedure, 1898
- » 11-Code of Civil Procedure, 1908
- » 12-The Qanun-e-Shahadat

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★★★★★ 1 Votes

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Be the first to like this.

*Handwritten signature*

ATTESTED



22

Annex  
"H"

**OFFICE OF THE DISTRICT HEALTH OFFICER BUNER AT DAGGER**

Phone & fax # 0939-510138, Email: dhobuner@gamil.com

No. 9017

Dated 21 / 12 / 2018

Comments and reports in respect of Mr Hamsher Khan Medical Tech BHU Gagra is given below)

From, District Health Officer  
District Buner,

To, Director General Health Services Peshawar  
Khyber Pakhtunkhwa

Subject: APPEAL IN RESPECT OF MR. HAMSHER MT BHU GAGRA BUNER

R/Sir,

I have the honor to state that the officials concerned Named Mr. Hamsher Khan PHC Tech BPS -12 was on General Duty at DHQ (H) dagger, after the cancelation of General duties by the quarter concerned, he relieved by MS DHQ (H) Dagger to report on his original post at BHU Gagra, But till date the medical officer BHU Gagra Dr. Nadir Khan refused to accept his arrival report on his original post at BHU Gagra. The Medical officer also ignored the written statement of DHO Buner (Copy attached), which is for ready reference, the M O concerned did not accept the arrival report of the official concerned, but lastly this office directly accepted the arrival report of Mr. Hamsher Khan on his original post BHU Gagra accordingly (Copy attached)

After the acceptance of arrival report by DHO Buner, the official marked his attendance for a Month in attendance register, soon after the medical officer BHU Gagra prevent him to mark his attendance for daily basis against rules. And has kept the attendance register lock in his room.

The undersigned his already been directed the medical officer I/C BHU Gagra on official order No. 6932 dated 07-09-2018 (copy attached).

Moreover the local body has also submitted a written resolution against the medical officer concerned to the undersigned (copy attached), now recently the official concerned has submitted appeal against M.O Gagra, SMT Gagra and MT named DR. Nadir Khan Mr Amir Nawaz and Ali Rehman (General Duty because they have been transferred to various station on the base of inquiry conducted by DC Buner, but the officer and officials concerned still performing duty in BHU Gagra against the rules (copy attached) The medical Tech Ali rehman having his original post at BHU Bagh Buner But he still continue has duty in BHU Gagra (occupied space for MT Hamsher Khan), while General Duties have already been cancelled by the quarter concerned (copy attached) and Amir Nawaz Medical Tech was declared guilty in the inquiry concerned, and he was transferred to CD Annawar in the light of inquiry but he did not follow the orders, Recommended for action against the defaulters.

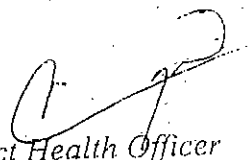
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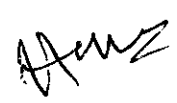
**ATTESTED**

23

The applicant Mr Hamsher Khan PHC Tec BPS-12 has follow and obeys all kind of officials order of the undersigned till date ,I recommened the officials concerned to continue his services on his original post at BHU Gagra Buner

Submitted for further N/action in this regards

  
FOV District Health Officer  
Buner



ATTESTED

G

~~22~~ 24

No 6738 /PF.

Dated: 31/10/2018.

Annex  
I

From, The District Health Officer  
Buner at Daggar

To, The Director General Health Services  
Khyber Pakhtunkhwa (KPK) Peshawar

**Subject: DUE ACTION REGARDING ILLEGAL CANCELATION OF  
THE TRANSFER ORDER OF MR. HAMSHER KHAN  
MEDICAL TECHNICIAN ON ADMINISTRATIVE GROUND  
ISSUED BY THE OUT GOING DISTRICT HEALTH OFFICER.**

R/Sir,

I have the honour to state that a Notification was issued by the Honorable Secretary Health Govt: of KP Health Department Notification No. E and A (Health) 13-77/2018 (F) date 30/07/2018, (copy of notification is attached herewith) that as authorized DDHO Buner Management cadre BPS-19 attached to DHO Office has assumed the charge of DDHO Buner on 01-08-2018 copy attached) moreover the acting charge of DHO Buner is also assumed by the undersigned (copy attached) the Official concerned named Mr. Hamsher Khan PHC Technician (MP) PBS-12, His original post at BHU Gagra (Tehsil Gagra) is under the control of the undersigned. He is receiving salary on his original post i-e at BHU Gagra (Payroll copy attached).

It is further added that the general duties have already been cancelled by the Ex: DHO Buner as per written directives by the D.C Buner (Copy attached) and also I.M.U is submitting monthly report of the un-authorized absent and detail of general duties of the officers/officials the undersigned have initiated action against the defaulters under the report of I.M.U (Copy attached)

The official concerned arrival report at BHU Gagra, has already been accepted by the then DHO Buner (Copy attached)

submitted for information and further necessary guideline in this regard please.

  
D.H.O  
Distt: Buner

Hamz  
ATTESTED

BHU Gogha

**Annex**

*BDG*

**Controller General of Accounts, Pakistan**  
 Islamabad  
**DDO'S OPEN & FILLED POSTS**

DDO CODE: BD6203 SEARCH

**25**

View: (Standard View) Print Version Export

OPEN/FILLED	POSITION	Personnel No	Employee Name	BPS	DESCRIPTION	Job Description
FILLED	80025378	272429	AMIR NAWAZ KHAN	12	PRIMARY HEALTH CARE TECHNICIAN (MULTI PU	PRIMARY HEALTH CARE TECHNICIAN
FILLED	80025395	274142	TORANGA	04	DAI	DAI
FILLED	80025407	537511	MEHNAZ ALI	12	PRIMARY HEALTH CARE TECHNICIAN (MCH)	PRIMARY HEALTH CARE TECHNICIAN
FILLED	80025414	386182	MOMN KHAN	03	BEHISHTI	BEHISHTI
FILLED	80025419	275675	HAMSHER KHAN	12	PRIMARY HEALTH CARE TECHNICIAN (MULTI PU	PRIMARY HEALTH CARE TECHNICIAN
FILLED	80025422	868776	MUHAMMAD INAM	04	WARD ORDERLI	WARD ORDERLI
FILLED	80025436	836782	QAMRAIZ KHAN	03	CHOWKIDAR	CHOWKIDAR
OPEN	80025429			17	MEDICAL OFFICER	MEDICAL OFFICER

*HAZ*  
**ATTESTED**

Annex  
"K" 26

**OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT  
BUNER**

Phone & Fax # 0939-510138, Email: dhobuner@gmail.com

No. 2815-201

Dated the 11/9/06/2018

**OFFICE ORDER/CANCELLATION OF GENERAL DUTIES**

As per directives by the chairman of Steering Committee Honorable Deputy  
Commissioner Buner (Minutes copy attached).

All kind of General Duties is hereby cancelled, the officers/officials are working on  
General Duty is hereby directed to report to their original posts within 03 days, otherwise the  
following action will be initiated against the defaulters.

1. Stoppage of pay
2. Out district transfer
3. Relieving
4. Entering in the service Book/ disobedience e.tc

It is further added that the I/Cs of concerned Health Facility is also directed to relive  
those offices/officials on General duties staff form their respective Health facility and report to  
this office, otherwise the I/C concerned will be held responsible for the same.

Submitted for strict compliance..

  
District Health Officer  
District Buner.

No.

Copy to;

1. Deputy Commissioner Buner for information please
2. IMU Swat
3. All the I/Cs of Concerned health facilities
4. Director General Health Services KP Peshawar
5. PS to Secretary Health Govt; of KP Peshawar
6. P/file

  
District Health Officer  
District Buner

Hanz  
ATTESTED

K

Amxcs  
"L" (27)

23/06/18 تاریخ کے لئے  
MS  
Relieve



**Office of the Medical Superintendent DHQ (H) Dagger Buner.**

Phn&fax#0937510223 E-mail: dhqbuner@gmail.com

No: \_\_\_\_\_/

Dated: \_\_\_\_\_/\_\_\_\_\_/2018

**Office Order**

In the light of DHO Buner order No.2815-20 Dated.19-06-2018 (Copy attached). You are hereby relived from your general duty today on 23-06-2018 and you are directed to report to your original post.

Medical Superintendent,  
DHQ (H) Dagger Buner.

Dated: 23/06/2018

No. 827-321

Cc to,

1. Deputy Commissioner Buner for information please.
2. DHO Buner for information.
3. DMO Malakand -1 for information.
4. Mr. Hamshir Medical Technician for information and compliance.
5. Office record.

Dr. Nadir Khan  
to accept his  
arrival.

23/06/18  
Medical Superintendent,  
DHQ (H) Dagger Buner

*Handwritten signature*

**ATTESTED**

To

Annexes

The medical officer  
I/C BHA Bagra

(N)  
29

Subject: Charge Report

Sir - I have the honor to submit  
that I have been transfer  
back to my original post  
to BHA Bagra according  
to order no 2865-20  
dated 19/06/18.

Therefore kindly accept  
my charge report on  
27/06/18 before noon.

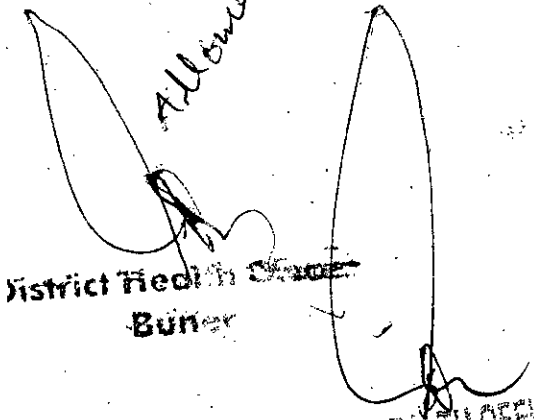
I shall be so Thankful

Yours obediently  
Hansher Khan M.D  
BHA Bagra

Dated 27/06/18

Wany ATTESTED

Allowed



District Health Officer  
Buner

DISTRICT HEALTH OFFICER  
BUNER

DIARY NO: 1092  
12/12/2018  
E. M. Khan

مکرم کے جواب میں ڈیپو آفیسر ڈسٹرکٹ لوئر  
عنوان پر میڈیکل آفیسر بی ایچ لوگاڑہ ڈاکٹر نادر خان  
زیر سر Attendance Register اپنے روم میں Lock  
کرا گیا ہے اور مجھے حاضری لگانے سے محروم کر رکھا ہے۔

جناب عالی! خود بائہ گزارش ہے کہ میں مجھ سے میڈیکل ٹیلنٹس  
بی ایچ لوگاڑہ میں اپنے اور پجنل کے توسط سے فراغت منہی سرانجام  
دے رہا ہوں۔ جناب! میں جنرل ڈپوٹی کے پاس DHQ ہسپتال  
ڈاکٹر میں خدمات انجام دے رہا تھا۔ 18/06/19  
آرڈر نمبر 20-2815 کے تحت ضلع لوئر صحت میں تمام قسم کی  
جنرل ڈپوٹی کو ختم ہے اور اپنے اور پجنل کے توسط سے حاضری  
منہی کر لیا گیا۔ آفسر بال کی حکم کی تعمیل کرتے ہوئے بی ایچ لو  
گاڑہ میں آرڈر رورڈ سے 2 ساڑھے حاضری ہوا۔ لیکن انجام  
فزلورہ نے کوئی وجہ بتا کر پورا آرڈر رورڈ منظور کرنے سے انکار  
کر دیا۔ اور یہاں تک کہ ڈاکٹر فزلورہ نے DHQ لوئر کے تحریری  
احتمالات کو نظر انداز کر لیا اور حکم ماننے سے انکار کیا۔ پھر  
DHQ لوئر نے ڈائریکٹ میں آرڈر رورڈ منظور کیا۔ اس  
کے بعد 26/06/18 سے 12/07/18 تک میں باقاعدہ رجسٹر  
حاضری میں اپنا حاضری دستاویز کیا۔ لیکن 12/07/18 سے  
اپنے تاحل ڈاکٹر انچارج نادر خان کے غیر قانونی اور زبردستی  
طور پر رجسٹر اپنے روم میں Lock کر رکھا ہے۔ اور مجھے نہ ملنے

میں اور نہ ہی رجسٹر میں حاضری لگانے دیتا ہے۔  
P.T.O

Hans  
ATTESTED



جناب عالی! میں نے بحیثیت سول سٹیٹنٹ تمام آرڈرز کو  
ایچ بی ون وٹن ٹول پیاج سے جیلہ بتایا 18/09/10 -  
آرڈر نمبر 6932 زر کے ڈائریکٹ ایچ بی ون ٹول کے ساتھ  
اختصاصات جاری کیے گئے کہ مہر شہزاد خان کو  
Attendance

رجسٹر روزانہ حاضری کیلئے دستیاب کیا جائے لیکن معلوم  
ایچ بی ون نہ حکم بھی ماننے سے صاف انکار کیا۔ اس لئے  
ڈائریکٹ ایچ بی ون ڈائریکٹ خان سے خلاف ڈیپارٹمنٹل انکوائری کی گئی  
ان سے پوچھا جائے کہ کیوں آپ سرکاری دلائل کو ماننے سے  
آپ صاحبان کی آرڈرز کی ٹون سے گریز کرتے ہیں؟  
ایچ بی ون ٹول کے لئے ایچ بی ون اور ایچ بی ون کے  
اوقات میں ہر وقت حاضری دیتا ہوں۔

(1) جتنا چلوں ہو سکتی ہیں ایچ بی ون ٹول سے رجسٹر حاضری  
بازیاں کرائی تان مستقبل میں تنازع نہ ہو۔ اور قانون کی  
بالادستی قائم رہے۔ شکریہ

اے ما تابعدا

M.T  
مہر شہزاد خان  
ایچ بی ون ٹول کے لئے

15/12/18 -

ATTESTED



Annexed  
"M" (28)

Office of the Medical Superintendent DHQ (H) Dagger Buner.

Phn&fax#0937510223 E-mail: dhqhbuner@gmail.com

No: \_\_\_\_\_/

Dated: \_\_\_\_\_/\_\_\_\_\_/2018

Office Order

In the light of DHO Buner order No.2815-20 Dated.19-06-2018 (Copy attached). You are hereby relived from your general duty today on 23-06-2018 and you are directed to report to your original post.

Medical Superintendent,  
DHQ (H) Dagger Buner.

Dated: 23/06/2018

No 227-321

Cc to,

1. Deputy Commissioner Buner for information please.
2. DHO Buner for information.
3. DMO Malakand -1 for information.
4. Mr. Hamshir Medical Technician for information and compliance.
5. Office record.

Dr. Nadiya Khan  
to accept his  
arrival

23/6/18

23/06/18  
Medical Superintendent,  
DHQ (H) Dagger Buner

Hamshir  
ATTESTED

# ✓ IMU Report to DHO

32

## Health Buner

Hamshair khan medical technician has been relieved to report his original post of duty at BHU Gagra on dated 23-6-2018 .

He did not arrived **OR** the doctor donot accept his arrival. Attendance register is locked. The condition among the health facility staff are panic and tortious. If not redress timely it may lead to bad consequences...

If feasible for Dho sb to guid us please how the IMU team report him.

1. Mark present (not yet arrived)
2. General duty (being relieved)
3. Absent

11:00 PM

Gohar Imu

Hamshair khan medical technician has been relieved to report his original post of duty at BHU Gagra on dated 23-6-2018 ....

Mark him present becos he is tranferred to his original place of posting.the MO incharge has been directed to hand over the attendance register.

12:12 PM ✓

↪ Forwarded

*Han*  
ATTESTED

To

33

The District Health Officer  
at Daggar District Buner.

Subject: MEDICAL OFFICER I/C BHU GAGRA DO NOT ALLOW ME TO MARK ATTENDANCE FOR A PERIOD OF MORE THAN TWO WEEKS.

Memo;

I have the honor to submit that I am doing my duty here in BHU Gagra at original post since long. I am physically hundred percent present at the station during duty hours, but the medical Officer BHU Gagra do not allow me to mark may attendance in register as per rules.

Moreover, the register has been kept locked under his strict watch.

I have so many time requested him to give me the register for attendance, but he repeatedly refused to do so.

Dear Sir, I have no choice other than to request you in this regard.

The following points must be remember sir;

- 1- The Medical Officer BHU Gagra do not follow the orders and rule of his high-ups and committed wrong after wrong and shows his personal interest in the health facility matters.
- 2- The Medical Officer BHU Gagra consider the Health facility his own personal property and he treats everything according to his own interest and wishes.
- 3- Due to his this act of injustice create only panic situation in the peaceful atmosphere of the Health facility.
- 4- Sir, the Medical Officer incharge BHU Gagra ruins all the laws, orders and rules regulations.

Therefore, it is necessary to take a drastic step against him in respect his disputed and illegal position as per rules

With a lot of thank

*Sooner  
The Comptrol Authority  
DHO will take legal  
Action up to  
15-8-18*

Your's obediently,  
Hamsher Khan MT.  
BHU Gagra

Dated; 09-08-2018

Copy to;

- 1- Deputy Commissioner Buner.
- 2- Inquiry Officer Assistant Commissioner Daggar.
- 3- DG Health Khyber Pakhtunkhwa Peshawar for information, please.

*Esat  
17/8/18*

*Huss*  
ATTESTED

Annex  
"P" (34)



**OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER**

Phone & Fax # 0939-510138, Email: dhobuner@gmail.com

No. 6832 / 1

Dated the 10/10/2018

To,

The Deputy Commissioner  
Buner

Subject:

**KP CITIZEN**

*R/sir,*

In reference Complaint ID: 84599 on KP Citizen dated 07/09/2018, in r/o Mr. Hamsher PHC/Tech;MP BPS-12 attached to BHU Gagra.

In this regard Medical Officer I/C BHU Gagra is hereby directed to allow the attendance register for the daily attendance to Mr. Hamsher PHC/Tech;MP attached to BHU Gagra with immediate effect in the best interest of public services.

Submitted for information & further n/action please.

*[Signature]*  
District Health Officer  
District Buner

No.

Copy to

1. Mo I/C BHU Gagra
2. The above name official
3. P/file

*[Signature]*  
District Health Officer  
District Buner

*[Signature]*  
**ATTESTED**

Annex

Q

35

512  
DIARY NO: \_\_\_\_\_  
Date: 04-10-2018  
DHO Buner

OFFICE OF THE  
DEPUTY COMMISSIONER,  
BUNER.

No /DC/(B) (E)E.A 15198-99  
Dated 03-10-2018.

To

The District Health Officer,  
Buner.

Subject.

INQUIRY AGAINST MEDICAL OFFICER, MEDICAL TECHNICIAN OF  
BHU GAGRA.

Memo:

An Inquiry report submitted by the Addl. Assistant Commissioner Gagra,  
Buner on 28-09-2018 is sent herewith.

In this context, you are directed to implement the recommendations of the  
inquiry report within 03 days positively under intimation to this office.

  
DEPUTY COMMISSIONER  
BUNER

Endst. No. date even.

Copy forwarded for information to the Addl. Assistant Commissioner Gagra,  
Buner w/ r to above.

DEPUTY COMMISSIONER  
BUNER

  
ATTESTED

# INQUIRY AGAINST MEDICAL OFFICER, MEDICAL TECHNICIAN

BHU, GAGRA

36

## Introduction

In pursuance of Deputy Commissioner Buner directions on the face of an application submitted by Mr. Hamsher Khan, Medical Technician, BHU Gagra dated 19-019-2018, the undersigned has been appointed to conduct inquiry and submit findings within one week.

The undersigned summoned all the stakeholders including DR. Nadar Khan, incharge BHU Gagra, Mr. Hamsher Khan, Medical Technician(MT) BHU Gagra, Mr. Amir Nawaz, Medical Technician BHU Gagra and Mr. Ali Rehman Medical Technician BHU Gagra to personally appear before the undersigned on 26-09-2018. They recorded their statements in the subject inquiry and were crossed examined in light of record. Dr. Tariq, DDHO represented the office of District Health Officer Buner and provided assistance as and when required.

## Brief History of the Case

Mr. Hamsher Khan, MT BHU Gagra submitted an application to the honorable Deputy Commissioner, Buner on 12-07-2018, requesting for redressed of the following irregularities:

- ✓ a. That despite of clear cut orders from the Competent Authority (DHO, Buner), the M.O I/C BHU Gagra did not accept his arrival report and refused to allow him to mark his presence in the attendance register.
- ✓ b. That after his posting orders, Mr. Ali Rahman, MT was not relieved to report to his previous station of duty i.e. BHU Bagh, KhaduKhel.
- ✓ c. That Dr. Nadir Khan I/C BHU Gagra remained absent from duty w.e.f 26-06-2018 to 11-07-2018 without any approval from the Competent Authority and marked his attendance in the register thereafter.
- ✓ d. That Mr. Amir Nawaz, MT BHU Gagra mostly attends all the patients and maintains the treatment register, which is against the rules.

The inquiry was initially assigned to Dr. Azmat Wazir, AC Daggar, but he could not submit findings due to his visit abroad. Aggrieved by the delay, the applicant/ complainant once again met with the Deputy Commissioner, Buner and requested for speedy disposal of the inquiry. The worthy DC, Buner was pleased to direct the following on the face of the application.

*Hamz*  
**ATTESTED**

"Dr. Azmat, AC Gagra is on leave. In the interest of justice and speedy disposal, inquiry is handed over to Mr. Latif, AAC Gagra. He is directed to submit findings within one week".

37

Brief Facts of the Case

1. Upon the recommendation of IMU health and directions of the Chairman District Steering Committee on Health (DC, Buner), the DHO Buner issued an office order dated 19-09-2018, whereby all kinds of General Duties were cancelled and all officers/officials working as such were directed to report to their original posts within 03 days (**Annex -A**) Mr. Hamsher, MT, who was then working on general duty at DHQ, Buner, was accordingly relieved by MS DHQ dagger on 23-06-2018 (**Annex-B**) and he reported to BHU, Gagra to join his original post. But the I/C M.O (Dr. Nadir Khan) did not accept his charge assumption despite verbal and written directions of the DHO, Buner. Dr. Nadar presented the following grounds for refusal of his arrival:
  - a. That Mr. Hamsher, MT has had a lose moral character and he was posted out to BHU Chanorai on the recommendations of inquiry conducted against him in 2015 (**Annex-C**)
  - b. That he was posted to RHC, Deewana Baba and should assume charge there (**Annex-D**)
2. Mr. Hamsher, MT in his application claims that BHU Gagra was his original post and after the cancellation of general duty orders, he should have been allowed to assume charge there. This claim also does not hold water, as he was posted to BHU Chanorai On the recommendation of inquiry committee in 2015. The post of MT is not restricted to any particular BHU, but rather they can be posted anywhere in the District. Similarly, his claims for spouse policy also cannot be considered as spouse policy does not take effect in intra-district posting. He also transgress his authority by enlisting his name in the attendance register and marked attendance without approval of the Incharge of BHU Gagra.
3. Similarly, Dr. Nadar Khan who was posted from District Chitral vide Health Department's notification dated 28-12-2017 (**Annex-E**) was then posted at BHU Gagra against the vacant post on 01-01-2018. Later on he was also given additional charge of the post of Additional EPI Coordinator /Incharge ACD/DMU on 01-03-2018 by the DHO Buner. Due to this reason he mostly remained in DHO office, while Mr. Amir Nawaz MT used to attend all the patient in his absence. I personally inspected

Hamz

ATTESTED



BHU Gagra twice during this time and the issue of non availability of Doctor ,locking of his room and attendance register was brought into the notice of the then DHO Buner, but unfortunately no remedial action was taken. Dr. Nadir Khan should also have accepted the arrival report of Mr. Hamsher MT being issued by the competent authority i.e DHO Buner.

38

### Observation/findings.

This case is a classic example of mismanagement, mal- administration, political interference, violation of merit and lack of accountability in the office of DHO Buner. Conflict in a workplace is unavoidable. The ability to recognize conflict, understand the nature of conflicted and to be able to bring swift and just resolution to conflict, is true leadership. Putting one's head in the sand and hoping that conflict will pass you, is not the most effective methodology for problem solving. Conflict does not resolve itself -in fact it escalates if not dealt with proactively and properly. Unresolved conflicts often result in poor service delivery.

The cancelation of General Duty order was used for promotion of personal interests and posting cronies in the desired places. The non-availability of doctor at BHU Gagra and attending of patients by M.T was highlighted by me and the IMU monitors many a times, but no remedial action was taken.

There is also some elements of politic involved in the instant case. Mr. Hamsher MT is supported by the local JI leadership; while both Dr. Nadar and Amir Nawaz, MT are backed by ANP .Both the parties want to retain their influence in the area by placing their favorites in the BHU Gagra. In fact, this issue has become a bone of contention between them. Transferring all of them from their current positions would ensure transparency, accountability and better discipline in future.

### Recommendation

1. The DHO Buner may be directed to ensure merit, free play ,non interference of politics and strict check and balance in the subordinate offices. Timely and prompt action should be taken, rather than lingering the issue, against all those who challenge the authority, violate discipline and use their official status for promotion of Political interests.

✓ 2. Dr. Nadir Incharge BHU Gagra may be strictly warned to ensure his timely attendance, improve his dealings with sub- ordinates and perform duties efficiently and diligently.

*Ham*  
ATTESTED

3. Mr. Hamsher MT may also be warned to avoid un-necessary entanglement in petty issues, respect and obey the orders of high ups and focus on efficient disposal of his responsibilities.

3. All the stakeholders involved in the instant case may be posted out from the current places of duties i.e. BHU Gagra.

39

The following posting proposal may be approved.

S.No	Name Official	From	To
1	Dr. Nadar	BHU Gagra	BHU Cheena
2	Amir Nawaz MT	BHU Gagra	Civil Dispensary Amnawar
3	Mr. Hamsher MT	BHU Gagra	RHC Dewana Baba

*Latif* 28/09/2018

LATIF UR RAHMAN  
AAC GAGRA/INQUIRY OFFICER

6-5-87  
2-10-14

*Hay*  
ATTESTED

R

Annex  
"R" 40



**OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER**  
Phone & Fax # 0939-510138, Email: dhobuner@gmail.com

No. 8246-501

Dated the 1/04 /10/2018

**OFFICE ORDER:**

As approved by the Honorable Deputy Commissioner Buner office order No. DC/(B)(E)E.A dated 03/10-2018.

The following officers/officials are hereby directed to report for duty with immediate effect in the best interest of service.

S#	Name	from	To
1	Dr. Nadir Khan I/CMO	BHU Gagra	BHU Cheena
2	Mr. Hamsher MT	-do-	RHC Dewanababa
3	Mr. Amir Nawaz MT	-do-	CD Amnawar

Arrival/departure report should be submitted to this office for record.

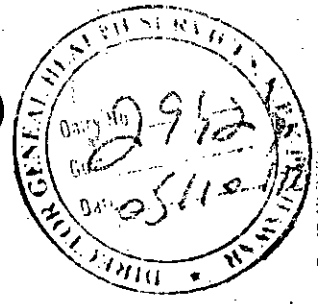
*[Signature]*  
District Health Officer  
District Buner

- No. /
- Copy to:
1. Deputy Commissioner Buner for information
  2. District Nazim Buner
  3. Dr. Tariq Dy; DHO Buner
  4. The above named officer/official
  5. Account/Estab; section of this office
  6. P/file

*[Signature]*  
District Health Officer  
District Buner

*[Signature]*  
**ATTESTED**

Annexed  
"S" (41)



The Director General Health Service  
Khyber Pakhtunkhwa Peshawar.

Subject: DEPARTMENTAL APEAL AGAINST THE ORDER OF DHO BUNER

R/Sir

We have the honour to state that we have been transferred by the DHO Buner vide Office Order bearing Endst: No. 8246-50 dated 04.10.2018 to BHU Cheena District Buner and CD Amnawar District Buner (copy attached), on the directions of Deputy Commissioner Buner.

It is further stated that I Dr. Nadar Khan BS-17 and Mr. Amir Nawaz MT BS-14 are the employees of Provincial Health Department and DHO Buner and DC Buner are not authorized for our transfer.

It is therefore, requested from your good self that the said orders i-e transfer of Dr. Nadar Khan BS-17 and Mr. Amir Nawaz MT BS-14 may kindly be cancelled being illegal.

Thanking you anticipation sir.

Yours Obediently,

1. Dr. Nadar Khan MO/ Incharge BS-17  
BHU Gagra (Buner)

2. Mr. Amir Nawaz PHC Techn MP BS-14  
BHU Gagra (Buner)

C.C

District Health Officer Buner

DF

Hans  
ATTESTED

OFFICE OF THE DISTRICT HEALTH OFFICER BUNER

OFFICE ORDER

On the recommendation of District Government Tehsil Gagra on 13-11-2018, the following Posting/Transfer of PHC Tech: MP each BPS-12 is hereby ordered with immediate effect in the best interest of Public.

S.N	Name	From	To	Remarks
1	Mr. Hamsher Khan	BHU Gagra	RHC Deewana Baba	Vice S.No2
2	Mr. Hamid Gul	RHC Deewana Baba	BHU Gagra	Vice S.No1
3	Mr. Amir Nawaz Senior PHC Tech MP BPS-14 will continue his duty at BHU Gagra till further order.			

Arrival / Departure report should be submitted to this office.

*[Signature]*  
District Health Officer  
Buner at Daggar

Dated: 13 / 11 / 2018.

No. 323-30 / DDHO/GMK-

Copy forwarded to:-

1. The Deputy Commissioner Buner
2. The Deputy District Health Officer Tehsil GMK Buner
3. The MO I/C RHC Deewana Baba Buner
4. The MO I/C BHU Gagra Buner
5. The above named Officials
6. The Acctt;/Esstt: of this office
7. The IMU
8. The P/File

*[Signature]*  
District Health Officer  
Buner at Daggar

*[Signature]*

ATTESTED

4  
The Deputy District Health Officer Buner.

Annexes "U" (43)  
Send a copy to DGHS

To: The District Health Officer Buner.

Subject: APPEAL IN RESPECT OF MR. HAMSHER KHAN MT BHU GAGRA BUNER.

Respected Sir,

In reference your office letter NO. 1933/AE-VI, dated: 31-01-2019 on the subject noted above.

I have the honor to submit the names of the defaulters i.e.

DIARY NO: 137  
Date: 27-03-2019  
DHO Buner

1. Dr. Nadar Khan Medical Officer BPS-17 BHU Gagra
2. Mr. Amir Nawaz Khan SMT BPS-14 BHU Gagra.
3. Mr. Ali Rehman MT BPS-12 BHU Gagra (General Duty)

The above defaulters are working at BHU Gagra till date. It is further added that serial No.-1, 2 officer/official are not in my jurisdiction.

Therefore, I recommended to take disciplinary action may kindly be initiated against them as per rules.


Moreover serial No-3 named Mr. Ali Rehman MT BPS-12 is working on general duty at BHU Gagra instead of his original post i.e BHU Bagh Buner.

I have so many times directed him to report on his original post at BHU Bagh Buner as the general Duties have been cancelled by the quarter concerned, but he did not obey the official orders till date.

It is further requested to your good self to take disciplinary action against the above names defaulters for smooth running of the health facility in the best interest of public services.

Enclosures seven Nos.

Submitted for information and further necessary action please.

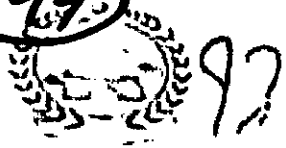
  
Deputy District Health Officer  
GMK Buner.

  
ATTESTED

DEPT. OF GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR.

Answer (44)

(V)



Phone No. (091) 9210269

Exchange (091) 9210187, (091) 9210196.

Fax # (091) 9210270

All communications should be addressed to the Director General Health Services, Peshawar and not to any official by name.

No. 8257 /AE-VI,

Dated 30/4/2019

The District Health Officer,  
Buner.

Subject: - APPEAL IN RESPECT OF MR. HAMSHER KHAN, MT BHU, GAGRA BUNER.

I am directed to refer to your letter No.1076/ dated 03/04/2019, on the subject noted above and to state to initiate disciplinary action and prepare "Draft Charge Sheet" against the officials concerned under E&O Rules 2011, and submit to this Directorate for onward submission to the Government.

*[Handwritten signature]*

DEPUTY DIRECTOR (PARAMEDICS)  
DIRECTORATE GENERAL HEALTH  
SERVICES KPK, PESHAWAR

*[Handwritten initials]*

*[Handwritten signature]*  
ATTESTED

مختلفہ خباہت ڈسٹریکشن ڈاکٹر ڈسٹرکٹ ہسپتال  
(Request) Conduction of an Inquiry against  
Medical officer I/C Bahu Gagra  
and Medical Tech. Amir Nawaz

جناب عالی! نابتہ ادب اور احترام کیساتھ گزارش ہے۔ کہ میں  
گاؤ کی طبیاتی یونین کونسل گاؤں کا اہل باشندہ ہوا اور تقریباً 2 سال  
سے گلہ کھتے ہیں اپنا فریضہ سر انجام دیتا آ رہا ہوں۔

جناب عالی! میں اپنا کیس آپ صاحبان کے سامنے مختصر بیان  
کرنا چاہتا ہوں تاکہ آپ صاحبان کے وقتے کا ضیاع نہایت کم ہو۔

جناب عالی! بتاریخ 18/06/19 آرڈر نمبر 20-2815 کے تحت دفتر معزز  
ذیل ضلع لوہڑی کھلتے ہیں جنرل ڈپوٹیشن پر کام کرنے والے تمام  
افراد کے آرڈرز کیفیل کرنے کے لئے اپنے اپنے original لوشوں پر جانے کے  
اختصاص کے ہادر فراہم کیے۔ ان افراد میں امیر نام بھی شامل تھا۔

جس کی رو سے بتاریخ 26/06/18 کو ڈیوٹی سے DHO ڈاکٹر سے  
Relieved کیا گیا۔ اور میں تمام متعلقہ آرڈرز اور ارائٹوں پر لوہڑی

کیس خارج کی ایک کو گاؤں کی کالکشن نادر نے پاس کیا۔ لیکن اس کے چند  
سیکشنز پر ڈیوٹی کے سیز پر میرے طرف سے زور سے پھینک دیئے۔ اور کہ آپ

کو تین روزوں میں بیٹھ جائے اور DC صاحب یہ آرڈر کچھ دن بعد  
کیفیل کریں گے اور آپے واپس جائیں گے۔

جناب عالی! میں حیران اور پریشان کھنکھن رہا اور سوچتا رہا  
کہ آخر کچھ ڈیوٹی سے بھی Relieved کیا گیا ہے اور اگر میرے سروس

میں دو چار دنے کا Gap آتا ہے۔ تو میں کھرتا کروں گا۔ اس لئے  
میں نے DHO لوہڑی سے رابطہ کیا اور اس کے متعلقہ اجازت کو  
تہہ دیا کہ اس کا ارائٹول Accept کریں، لیکن اس نے اس کا

تحریری حکم ماننے سے انکار کیا۔ اور کچھ دنوں میں DHO صاحب  
کے پاس جانا پڑا۔ اور DHO صاحب نے دفتر سے میرا ارائٹول

Accept کیا۔ اور جسٹس میں نام لکھنے اور حاجتوں کا حکم دیا۔

AAC (Gagra)

Dr. Azmat, AC

Dr. Azmat is on leave. In the interest of speedy disposal, Inquiry is handed over to Mr. Jafar to submit findings within one week.

AAC (Gagra) He is detected within one week

ATTESTED



جناب عالی! چارج لینے کے بعد ڈاکٹر صاحب نے (2) فحش پور میں  
آسمان تنگ کر رکھا ہے۔ اور فحش پور میں بھٹنے کی حد تک  
جگہ نہیں چھوڑے۔ اور جنرل ڈلوئی میں موجود ایٹھار کو زبردستی  
بجھایا ہے۔ اور ان سے کہتا ہے کہ جگہ بالکل نہیں چھوڑنا ہے۔ اور  
آپ کے نقصان کا میں زعم دار ہوں۔

جناب عالی! چارج BHU مائیک اور ایمر لوار ٹیلیشن ایک فافیم کے  
طور میں قائم کرتے ہیں۔ اور میں قرآن میں ہاتھ رکھ کر کہتا ہوں کہ وہ  
میں میں چار دن بھی ڈلوئی پر نہیں آتا۔ اور ان رولوں کی طرح  
سے متاثر والے بھی منہ کھول نہیں سکتے۔ اور ڈاکٹر صاحب کی  
عمر جو جوری میں ٹیلیشن ایمر لوار لوکس اور جھل سازی سے ان  
کے کا ضروری لگاتے ہیں۔ جس کا ثبوت یہ ہے کہ حال ہی میں وہ ڈرامی  
کیا ہوا تھا۔ لیکن ان کی عمر جو جوری میں مطلوب ٹیلیشن کے باوجود  
بے جھل سازی کے ذریعے ان کی چاہنری لگائی ہے۔ اور میرے موجودگی  
میں وہ 18-06-26 سے 18-07-11 تک وہ عائد ہے لیکن چاہنریا  
لگائی گئی ہے جس کا ریکارڈ درخواست کیساتھ منسلک ہے۔

جناب عالی! میں ڈاکٹر افسر BHU مائیک خود ہوئے ہی نہیں لیکن  
کیونکہ اور عوام لوگ ٹیلیشن کے رحم و کرم پر چھوڑ رکھے ہیں۔ جو  
میرا سر میں ڈاکٹر رولز کے خلاف ہے۔ اس کا ثبوت یہ ہے کہ میں  
رجسٹر میں ڈاکٹر کے بجائے علاج و عیوب ایمر لوار میں ڈاکٹر  
کے تحریر میں باقاعدہ درج ہے۔ جو ان کے غیر حاضری کے ایک  
فائل ثبوت ہے۔ اور ایک ڈاکٹر کے بجائے میں ڈاکٹر کی موجودگی میں  
کیونکہ ان لوگوں کے حکم پر قبضہ کے بجائے منفی اثر کے پھیلنے کا  
خوشم ہے۔

جناب عالی! میں ڈاکٹر افسر ایک بااثر شخصیت ہے۔ اور میں ایک عرب  
عمر ڈاکٹر ٹیلیشن میں اور شہزادہ پر بمشکل گزارا کرتا ہے۔ وہ کہتا ہے کہ دولت  
کے بل بوتے پر سب کو ہوسلنا ہے لیکن میں نہ کہ ہوں لیکن زبردستی۔

Has  
ATTESTED

صورتِ اصول سب کچھ ہے۔ اس لیے صاحبان سے التماس ہے کہ  
ان کے دلوں کو درج ذیل بنیادوں پر رکھ کر خوراک صاحبان انکو آری  
درج۔ اور انکو آری تک ٹیلیشن کو فریڈ لوگوں کے تحت سے کھیل  
ان سے روئے۔ اور مجھے کوئی بھی زبرداری سے روئے نہ تالم اپنی

تغواہ کے عوض میں اپنے علاقے کے لوگوں کا حوصلے کر سکو۔  
① یہ کہ مجھے کیوں آپ صاحبان کے آرڈر کے ہوئے ہوئے بھی اس کی  
دینے سے انکار کیا گیا وہ آپ سرکاری ملازم نہیں ہے؟  
② یہ کہ آپ صاحبان کے آرڈر کے ہوئے ہوئے کیوں جنرل ڈلوٹی پر  
علی رحمان جنرل ٹیلیشن اور دوسرے مشاف کے کو ابھی تک بھڑایا  
ہوا ہے کیا وہ سرکاری آرڈر کا پابن نہیں ہے؟

③ یہ کہ سرکار سے تغواہ لورا لبتا ہے۔ کیلئے کام روڈک لیس کر کے اس  
لڈان کے دستخطوں کا یا واچرہ سے سینکے لیا جاتا ہے۔ کیوں ہوتا  
کراری میں ہے اور حاضری مائٹن میں کیوں نکتی ہے؟

④ ٹیلیشن رجسٹر Maimtain کرنا ایک ڈاکٹر کا کام ہے اور یہ کام  
آپ کے غیر ہونے میں آپ غیر تربیت یافتہ ٹیلیشن سے کیوں کر لیتے ہیں؟  
اس لیے آپ صاحبان سے پر زور استدعا ہے کہ اپنے زیر نگرانی  
رجم بال چار لوگ ان دلوں کے خلاف صاف انکو آری  
کریں۔ تاکہ اس کے ملازم اپنے آپ کو لوگوں کے خاتم تصور کریں کہ  
بادشاہ۔ آپ کو صاحبان کے غنوں و فتنوں پر لگنا

آپ کا نا بجا  
M.T  
BHM  
DATE 12/7/18

ATTESTED

Annex "X" 48

**OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER**  
Phone & Fax # 0939-510138, Email: dhobuner@gmail.com

No. 6226-35/

Dated the 31 / /07/2018

**OFFICER ORDER / POSTING/TRANSFER.**

In the written statement/application in r/o Medical officer BPS-17 MO I/C, BHU Gagra vide no.nil dated 27/07/2018 ( copy attached)

The following posting/transfer of PHC Tech; MP BPS-12 is hereby order with immediate effect in the best interest of public service on administrative ground.

S#	Name	from	to	remark
1	Mr.Hamsher Khan	BHU Gagra	RHC Dewanababa	against the vacant post of Mr.Said Zarin Shah PHC/Tech;MP, due to long leave

Arrival/Departure report should be submitted to this office..

*District Health officer*  
District Buner

No

/

Dated/

/

/2018

Copy forwarded to;

1. Director General Health Services KPK Peshawar
2. Deputy Commissioner Buner for information
3. District Nazim Buner for information
4. MO I/C RIIC Dewanababa
5. DAO Buner
6. IMU swat
7. I/C BHU Gagra
8. The above name official.
9. Acctt; estob; section
10. P/file

*District Health officer*  
District Buner

*Ham*  
ATTESTED

49

**The District Health Officer at Daggar Distt: Buner**

**Subject:** Cancellation of transfer order to RHC

Diwana baba on the bases of the following reasons.....

Dear/Sir

I have the honor to submit that I am working as a medical technician in BHU (Gagra). Moreover I am also a permanent resident of village kalpani

Sir I would like to present before you some solid reasons in favour of the subject above.

⇒ 1) I always obey and respect the laws and rules regulations of the department positively I never transferred to anywhere on administrative or on an inquiry base before. If I was kept in DHQ Daggar, it was the demand of MS from BHU gagra not from RHC Negrai as per record attached because my salary is yet drawing from the BHU Gagra's BD and my post coming filled on my name since 18 years

⇒ 2) Dear sir I was on general duty at DHQ daggar I was make relieve vide letter No827-321 dated 23-06-2018 under directives of DHO vide letter No2818-20 dated 19-06-2018 on the subject (cancellation of all kinds of general duties)

After the termination of general duty I produced myself before medical officer incharge to accept my arrival report on 26-06-2018 on my original post on the same station but unfortunately the concerned MO refused to give me the charge accordingly. He also make me advised to take rest at home for four days till the cancellation order of the deputy commissioner Buner and DHO Buner. After arrive in my house I felt frightened about my service delay so at that time I decided

Encl. / Recd  
Comments  
6/8/18

Sir  
His original post  
at BHU Gagra

6/8/18

Han  
ATTESTED

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I gave my application to the head of the department (DHO) Buner. The DHO clearly wrote him namely to give me the charge but on seeing the order of DHO this time he also refused to do so. After the violation of DHO clear order by MO

I once again went to DHO office and luckily this time DHO Buner accepted my arrival report for the same station.

Dear sir we both medical officer Nadir Khan and I have no previous experience even for a single day of working relationship, then how can he produce these false calculations against me? and how can he refuse my charge/arrival report?

It means that he behaves like an actor on a written script by anonymous director. Dear sir I obey but he violates all the orders

⇒ 3) Dear sir meanwhile I have given an application for an inquiry against him to DC Buner but still the inquiry in the same case is under consideration and not reaches to the conclusion but during inquiry I came to know that my transfer has been made to RHC Diwana baba on administrative ground. It makes me really laugh, because on BHU side there are usually two administrative charges e.g National program and medicine store holding Ali Rahman (G/D) and Amir Nawaz MT respectively, I mean if a person does not have any of the above charges then how is it possible to interfere in their administrative affairs. So the transfer order as I have heard about, is completely baseless and his personal judgement against me and it is also against justice and merit because the case is currently under an inquiry file.

⇒ 4) Dear sir I present in BHU Gagra since my arrival here but after some attendance mark in register the MO in charge kept the attendance register locked in his room and ordered the room keeper not to touch the register in Hamsher Khan MT's hands

Dear sir I have the right to mark my attendance because I am still here in BHU Gagra and not relieved to RHC Diwana baba or any other place

⇒ 5) Moreover I have been transferred to BHU Gagra on spouse Policy base from Bajour agency.

Ham  
ATTESTED

51

According to S&GD rules wife and husband will be perform their duties on the same station and this act of transfers going against the rule above.

Therefore on the above reasons I request you to cancel my transfer order to Diwana baba and give me a chance of thank and hope you will find me prayful for the rest of your entire life

with a lot of thank

Obediently yours

Hamsher Khan Mt

BHU (Gagra)

Dated 02-08-2018

*Hamsher Khan*  
02/08/18

*Ham*

ATTESTED



(52)

**OFFICE OF THE DISTRICT HEALTH OFFICER BUNER**

**Office order**

As general duties have already been cancelled by the Honorable Deputy Commissioner Buner No. AG-1/1747-98 dated 09-05-2017 and this office order bearing endost No. 827-32 dated 23-06-2018 (Copy attached) the general duty officers/officials were directed to report to their original posts.

Mr. Hamsher Khan PHC Tech; MP BPS-12 is original post at BHU Gagra as <sup>discussed</sup> discharged with the Quarter concerned. (Copy attached)

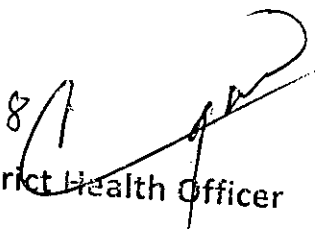
This office order was issued by Ex. DHO Buner vide No. 6226-35 dated. 31-07-18 (copy attached) is hereby cancelled.

Moreover, an application is submitted by the above name official on 06-08-2018 (copy attached).

He is directed to report in BHU Gagra positively.

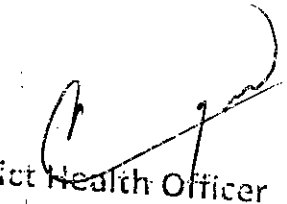
No 6411-14

Dated: 06-08-2018

  
District Health Officer  
Buner

Copy to;

- 1- Deputy Commissioner Buner.
- 2- Medical Officer BHU Gagra.
- ✓ 3- Official concerned.

  
District Health Officer  
Buner

*Harz*  
**ATTESTED**

AB 2A

Annex  
"Y"

53

OFFICE OF THE DISTRICT HEALTH OFFICER BUNER AT DAGGAR

OFFICE ORDER

MO I/C BHU Gagra Buner is hereby directed to handover the daily attendance registered to Mr. Hamsher Khan PHC Tech: MP (MT) BPS-12 for marking himself present in attendance registered in the best interest of public.

DY: DISTRICT HEALTH OFFICER  
TEHSIL: GMK BUNER

NO- 622-24  
-----/

Dated--18--/02/2019

Copy to:

1. The MO I/C of BHU Gagra.
2. The above name Mr. Hamsher Khan PHC Tech: MP (MT).
3. P/File.

DY: DISTRICT HEALTH OFFICER  
TEHSIL: GMK BUNER

Hasz  
ATTESTED



28

GOVERNMENT OF KHYBER PAKHTUNKHAWA  
OFFICE OF THE DISTRICT HEALTH OFFICER-DISTRICT BUNER  
Email: Dhobuner@gmail.com. Phone & Fax: 0939-510138

54



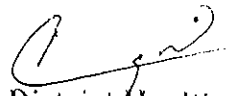
No: 422-29 / Pf

Dated: 06/02/2019.

OFFICE ORDER.

Due to long leave of Dr. Nadar Medical Officer I/C BHU Gagra is lying vacant, therefore Dr. Sajid is hereby directed to perform duty 3 days in BHU Gagra and 3 days duty at BHU Pandir as temporary Basis. Till the arrival of Dr. Nadir.

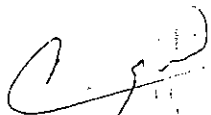
Moreover Mr. Ali Rahmar PHC Tech :MP BPS-12 Attached to BHU Bagha is directed to report for duty on his original post with immediate effect in the best interest of public.

  
Deputy District Health Officer  
GMK District Buner

Enlist No & Dated Even:

Copy to:

1. DHO Buner For information
2. I/C BHU Gagara.
3. I/C BHU Pandir.
4. I/C BHU Bagh.
5. Acct/Estb Of this office.
6. The above named Official.
7. IMU Swat
8. P/ file.

  
Deputy District Health Officer  
GMK District Buner

  
**ATTESTED**

کندہ کی ڈی ڈی ایچ اور صاحبہ گل ٹرسٹ کے لوگوں

جناب عالی -  
موجودہ انداز میں جو کہ میں نے ایچ او مارلہ

میں ایچ او فرانس میں سے انجام دے لیا ہے

آج مورخہ 12/06/19 اور نادر الخراج کی ایچ او مارلہ

نے زبردستی مجھے اپنے ملک سے زبردستی لگایا اور

رجسٹر اپنے آفس میں لاکے گیا اور مجھے

خانہ قری لگایا سے زبردستی مروتا اور مجھے

اپنے میں گالیاں دینے اور دھلی دنگل خبر دے

گیا کہ آگیا آدم ہیں نہیں جاننا اور تم ہمارے

مستافہ میں بھی نہیں ہو اور میرے خلاف سٹاف

کے کچھ افراد کسٹائل کر ڈیڑے اور دھمکانے کی

کھی روشنی کی۔

جو کہ میں نے ایچ او مارلہ آفٹیکیشن کی حیثیت

سے اپنا فرانس میں انجام دے لیا ہے اور ڈاکٹر

نادر مجھے اپنے فرانس میں انجام دے لیا ہے

میں اس کے خلاف کیسوں کے لیے درخواست

اس کے آگے ہا صالہ سے اسٹیمپ کے نام میں

نے والوں مار طانی لوتے اور اس نے بد دعاشی

و غیرہ مائلوں سے لیا جائے اور اس کو غیر قانونی

Handwritten signature  
ATTESTED

(56)

اعراض سے روکنے کے لئے ڈاکٹر نادر نے 2 -  
نفع مند روئے کھوج سے کسی بھی وقت 2  
خالات کے خرابے ہو سکتے ہیں اور میرا آپ  
ہا صبر سے اس پر کام لے لے ڈاکٹر کو  
اس سے پہلے باقاعدہ Inform کریں گے۔ کوئی  
ڈاکٹر نادر کوئی بھی حالت جاننے سے انکار  
جس میں آپ کو ڈاکٹر کو فالو کیا۔  
شکریہ

آپ کا تابع نادر

مہاشیخاٹ MT  
بی ایچ او ٹاٹنہ Harm

Dated: 12-06-19

Enrollment of  
12/6/19

Has  
ATTESTED

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Annex  
2-1/

(57)



GOVERNMENT OF KHYBER PAKHTUNKHAWA  
OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER  
EMAIL:DHOBUNER@GMAIL.COM. PHONE & FAX:0939-510138

NO: 5626

Date: 22<sup>nd</sup> November 2019

To,

1. The Manager HBL Swari.

Subject: - Release of Pay

Memo,

I have the honor to inform you office, Mr. Hamsher Khan PHC Tech(MP) BS-12 under the control of undersigned. Their Pay may be release on Account No. PLS 5455-6, with immediate effect in the best interest of Public services.

  
District Health Officer  
Buner

Endst: Even No & date.

Copy:-

1. Deputy Commissioner Buner for Information.
2. The above named Officer/ Official.
3. Office record.

  
District Health Officer  
Buner

Hanz  
ATTESTED

Annex 58  
2-2

GOVERNMENT OF KHYBER PAKHTUNKHAWA  
OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT BUNER  
Email: Dhobuner@gmail.com. Phone & Fax: 0939-516138



NO: 2184-92/PF

Dated: 18-07-2019

**OFFICE ORDER.**

The following posting / transfer of PHC Tech (MP) ES-12 with immediate effect in the interest of public.

S.No	Name	From	To	Remarks
1	Mr. Hamser Khan PHC Tech: (MP), BPS-12	BHU Gagra BD-6277	BHU Toorwarsak BD-6265, Vide ID Code NO:80025454	
2	Mr. Ghulam Raziq PHC Tech (MP) BPS-12	BHU Toorwarsak	BHU Gagra BD-6268 Vide ID Code NO:80025419	

Arrival /Departure report should be submitted to this office for record.

*[Signature]*

District Health Officer  
District Buner

**Endst No & Dated Even:**

Coye to:

1. District Account Officer Buner.
2. DDHO GMK for Information
3. DDHO Daggar For Information.
4. I/C BHU Toorwarsak for information.
5. I/C BHU Gagra for information.
6. Acct/Estb Of this office.
7. The above named Official.
8. IMU Swat.
9. P/File.

*[Signature]*

District Health Officer  
District Buner

*[Signature]*  
**ATTESTED**

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 542 /ST Dated 12 /03 / 2021

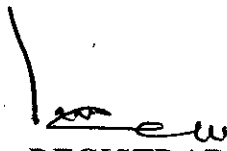
To

The District Health Officer,  
Government of Khyber Pakhtunkhwa,  
Buner.

Subject: - JUDGMENT IN APPEAL NO. 1121/2019, MR. HAMSHER KHAN.

I am directed to forward herewith a certified copy of Judgement dated 01.03.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.