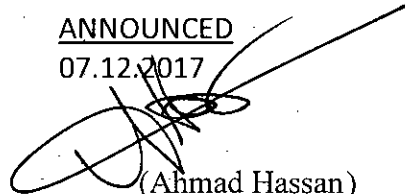


07.12.2017

None present on behalf of the appellant. Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Noor Ali Khan, Deputy Director for the respondents present. The Court time is about to over but none appeared on behalf of the appellant nor the appellant was present in person despite issuance of notice, therefore, the present service appeal is dismissed in default for want of non-prosecution. File be consigned to the record room.

ANNOUNCED

07.12.2017




(Ahmad Hassan)
Member (E)



(Muhammad Amin Khan Kundi)
Member (J)

23.05.2017

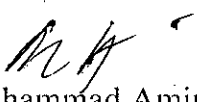
None present for the appellant. Mr. Qudratullah, Coordinator alongwith Addl. AG for the respondents present. Written reply submitted. Cost of Rs. 1500/- also paid receipt thereof be obtained from the learned counsel for the appellant. To come up for rejoinder and arguments on ~~28.9~~ 2017 before D.B.


(Ahmad Hassan)
Member

28.09.2017


None present on behalf of the appellant. Mr. Muhammad Adeel Butt, Additional AG for the respondents present. Notice be issued to appellant and his counsel for attendance for 02.11.2017 before D.B.


(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member

02.11.2017

None present on behalf of the appellant. Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Noor Ali Khan, Deputy Director for the respondents present. Again notice be issued to appellant and his counsel for attendance for 07.12.2017 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

28.03.2017

Counsel for the appellant and Mr. Yar Gul, Assistant alongwith Addl: AG for the respondents present. Written reply not submitted despite last opportunities. Requested for further adjournment. Last opportunity further extended subject to payment of cost of Rs. 500/- which shall be borne by respondents from their own pockets. To come up for written reply/comments on 20.04.2017 before S.B.


(AHMAD/HASSAN)
MEMBER

20.04.2017

Counsel for the appellant and Mr. Said Ghulam, Litigation Officer alongwith Addl. AG for the respondents present. Written reply not submitted despite extension of last opportunity and cost of Rs. 500/-. Another last opportunity is extended subject to payment of further cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost of Rs. 1500/- on 23.05.2017 before S.B.


(Muhammad Amin Khan Kundi)

Member

722/16

13.12.2016

Since 12th December, 2016 has been declared as public holiday on account of 12th Rabi-ul-Awal, therefore, case to come up for the same on 18.01.2017 before S.B.


Reader

18.01.2017

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 27.02.2017 before S.B.


(ASHFAQUE TAJ)
MEMBER

27.02.2017

Clerk counsel for appellant, Mr. Amjid Ali, Assistant alongwith Mr. Muhammad Adeel Butt, Additional AG for official respondents No. 1 to 3 & 5 present. None present on behalf of private respondent No. 4. Fresh notice be issued to private respondent No. 4 for submission of written reply. Written reply by official respondents also not submitted. Representative of official respondents requested for further time. Last chance granted to the respondents for submission of written reply. To come up for submission of written reply/comments on behalf of official respondents No. 1 to 3 & 5 as well as private respondent No. 4 on 28.03.2017 before S.B.



(ASHFAQUE TAJ)
MEMBER

21.07.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was posted as Coordinator in LHW Programs DIHO Karak on 03.04.2015 and was transferred prematurely vide impugned order dated 17.03.2016. He argued that his transfer was made with disregard to the transfer/posting policy as the appellant had not completed his normal tenure in the previous station. He further argued that no inquiry was conducted and the orders were based on malafide as vide impugned order Dr. Majid who was Nephew of the DIHO Karak was posted in place of the appellant. He further argued that transfer was not a penalty in the F & D rules and hence transfer of the appellant as a punishment could not be justified under the law and rules. He further argued that vide his comments the DG Health himself admitted that the transfer was made prematurely and requested for admitting the instant appeal for regular hearing.


Appellant's
Security & Process Fee

Point urged at the Bar needs further consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days where-after notices be issued to the respondents for written reply/comments for 22.09.2016 before S.B.


Member

22.09.2016

None present on behalf of the appellant. Mr. Niaz Muhammad, Clerk alongwith Additional AG for official respondents No. 1 to 3 & 5 and private respondent No. 4 in person present. Written reply by official respondents as well as private respondent not submitted. Official respondents and private respondent requested for time to file written reply. Request accepted. To come up for written reply/comments on 07.11.2016 before S.B.


Member

07.11.2016

Appellant in person and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 12.12.2016 before S.B.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 722/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	15/07/2016	<p>The appeal of Dr. Aftab Ahmad presented today by Mr. Muhammad Tahir Zaman Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"><i>Signature</i> REGISTRAR</p>
2-	18-7-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>21-7-16</u></p> <p style="text-align: right;">MEMBER</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

IN RE:
Service Appeal No. 722 / of 2016

Doctor Aftab Ahmad son of
Muhammad Ali Khan Khattak Appellant

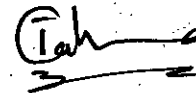
VERSUS

Secretary Health, Health Department,
Khyber Pakhtunkhwa, Civil Secretariat
Peshawar and others... .. Respondents

INDEX

S.No	Description of documents	Annexures	Pages
1.	Service Appeal		1 - 5
2.	Affidavit		0 - 6
3.	Copy of Transfer Order dated 03.04.2015	'A'	0 - 7
4.	Copy of Departmental Appeal dated 25.01.2016	'B'	0 - 8
5.	Copy of the impugned order dated 17.03.2016 with Postal Receipt No. 844.	'C'	9 - 10
6.	Departmental Appeal dated 10.04.2016	'D'	11 - 12
7.	Departmental Appeal dated 24.03.2016	'D-1'	13 - 14
8.	Office Order dated 02.10.2015	'E'	15 - 19
9.	Office Order dated 03.06.2016	'F'	0 - 20
10.	Vakalat Nama		

Through: Appellant



(Muhammad Tahir Zaman)
Advocate, High Court
B-4 Haroon Mansion
Khyber Bazar, Peshawar.
Cell # 0345-9109223

Dated: 15.07.2016

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 722 / of 2016

Doctor Aftab Ahmad son of
Muhammad Ali Khan Khattak,
resident of House # 17, Street # 2,
Sector E-2, Phase-I Hayatabad Peshawar
presently working at Takht-e-Nasrati Hospital
Karak...

Khyber Pakhtukhwa
Service Tribunal

Diary No. 708

Dated 15-7-2016

... Appellant

VERSUS

1. Secretary Health, Health Department,
Khyber Pakhtunkhwa, Civil Secretariat
Peshawar.
2. Director General Health Services,
Khyber Pakhtunkhwa, Civil Secretariat,
Peshawar.
3. Government of Khyber Pakhtunkhwa
Through Chief Secretary,
Civil Secretariat, Peshawar.
4. Dr. Majid Khan, Coordinator NP for
FP&PHC, Karak.
5. DHO Karak.

... Respondents

APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE OFFICE ORDER NO. SO(E)H-11/4-1/2016
DATED 17.03.2016 ISSUED BY RESPONDENT NO.1 AND
OFFICE ORDER NO. SO(E)H-11/4-1/2016 DATED
07.04.2016, WHEREBY THE APPELLANT WAS
TRANSFERRED FROM COORDINATOR LHW PROGRAM
DHO OFFICE KARAK TO TYPE-C HOSPITAL TAKHT-E-
NASRATI KARAK AND RESPONDENT NO.4 WAS
TRANSFERRED THROUGH ORDER DATED 07.04.2016,
IS ILLEGAL, VOID, WITHOUT MERIT AND
PREMATURE AND ONLY FOR ADJUSTING BLUE EYED
PERSON AS WELL AS FOR NO LEGAL REASON,
AGAINST THE TENURE POLICY AS WELL AS RULES
AND REGULATIONS.

Filed today
S. Shafiq
15-7-16
Registrar

Respectfully Sheweth:

The appellant humbly submits as under:-

1. That the appellant was appointed in the respondents Department and serving as Civil Servant on Regular Basis in the Health Department Khyber Pakhtunkhwa since 12.12.1998.
2. That through Office Order No. SO(E)H-11/4-1/2015 dated 03.04.2015, the competent authority was pleased to transfer the appellant from DHQ Hospital Karak to Coordinator (BPS-17) NB for FP&PHC Karak. (Copy of the transfer order dated 03.04.2015 is attached herewith as annexure 'A').
3. That the appellant is the holder of Post Graduate Qualification in the field of Public Health.
4. That the appellant assumed the charge of District Coordinator Lady Health Workers programs Karak on dated 01.05.2015.
5. That earlier DHO Karak recommended the appellants transfer and to be replaced by his blood relative (Nephew) respondent no.4 who was appointed on Contract Basis.
6. That against the illegal recommendation of DHO Karak, the appellant filed Departmental Appeal on dated 25.01.2016, vide Diary No. 838/29.1.2016. (Copy of the Departmental Appeal dated 25.01.2016 is attached herewith as annexure 'B').
7. That after the said Departmental Appeal the illegal recommendation of DHO Karak was snot approved.
8. That to the astonishment of the appellant, the appellant was once again transferred through order No. SO(E)H-11/4-1/2016 dated 17.03.2016. (Copy of the impugned order dated 17.03.2016 is attached herewith as annexure 'C').

9. That feeling aggrieved the appellant filed the appeals before the competent authorities but the same were not responded within statutory period, hence the present appeal. (Copies of the Departmental Appeals are attached as annexures 'D& D-1').
10. That due to the above mentioned reasons the appellant prefers the instant appeal on the following grounds amongst others:-

GROUND:

- a. That due to the impugned transfer order the appellant has not been treated in accordance with law and his rights secured and guaranteed under the law has been violated.
- b. That the appellant was not treated in accordance with law and discrimination of the respondents department is highly deplorable and condemnable, being without any authority, unlawful and against the norms of justice.
- c. That the transfer order is issued without completing probation period, moreover the substitute has not been provided in the impugned notification.
- d. That respondent No.4 services were regularized through Office Order No. SOH(E-11)3-18/2015 dated 02.10.2015, respondent No.4 is shown at Serial No. 69. (Copy of the Office Order dated 02.10.2015 is attached herewith as annexure 'E').

- e. That respondent No.4, without completing probation period got transferred through the impugned order in place of the appellant.
- f. That as the respondent No.4 is blood relative of DHO Karak, was adjusted illegally, prematurely and against the norms of justice.
- g. That on Departmental Appeal the respondents Department through order No. 3081/E-1/A.165 dated 03.06.2016 admitted that the impugned transfer order is premature, however, new allegations were attributed to the appellant. (Copy of the order dated 03.06.2016 is attached herewith as annexure 'F').
- h. That the appellant already submitted his reply/statement and no further action has never been intimidated to the appellant.
- i. That the appellant was not given opportunity to defend and thus condemned unheard.
- j. That no such allegations have yet been proved and thus he is condemned unheard which is not warranted in the law.
- k. That no such action is warranted without any proof and opportunity of defense, thus committing an act which is against fundamental rights of the appellant and is against the Constitutional guarantees available.

1. That any other ground which has not been specifically taken may kindly be allowed to argue the same.

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the respondents may very graciously be directed to cancel the impugned orders as prayed for and the appellant may kindly be allowed to resume the post as Coordinator along with any other order deems proper in favour of the appellant against the respondents.


Appellant

Through:

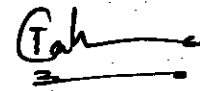


(Muhammad Tahir Zaman)
Advocate, High Court
B-4 Haroon Mansion
Khyber Bazar, Peshawar.
Cell # 0345-9109223

Dated: 15.07.2016

CERTIFICATE:

Certified that as per instructions of my client, no such Service Appeal on behalf of the appellant has earlier been filed in this Honourable Service Tribunal on the subject matter.


Advocate

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

IN RE:
Service Appeal No. _____ / of 2016

Doctor Aftab Ahmad son of
Muhammad Ali Khan Khattak Appellant

VERSUS

Secretary Health, Health Department,
Khyber Pakhtunkhwa, Civil Secretariat
Peshawar and others... .. Respondents

AFFIDAVIT

I, Dr. Aftab Ahmad son of Muhammad Ali Khan Khattak, resident of House # 17, Street # 2, Sector E-2, Phase-I Hayatabad Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Service Tribunal.



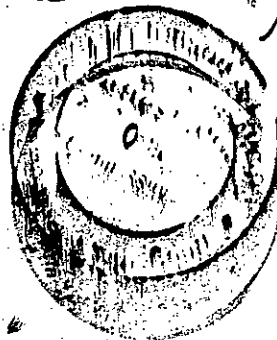
Deponent

Aftab

IDENTIFIED BY:

Tahir

(Muhammad Tahir Zaman)
Advocate, Peshawar.





GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 03rd April 2015

NOTIFICATION

No.SO(E)H-II/4-1/2015 The competent authority is pleased to transfer Dr. Aftab Ahmad, Medical Officer (BPS-17) from DHQ Hospital Karak to Coordinator (BPS-17) NP for FP & PHC Karak against the vacant post with immediate effect, in the best public interest.

**SECRETARY HEALTH
HEALTH DEPARTMENT**

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar w/r to his letter No.1237/E-I dated 22.01.2015.
3. DHO Karak.
4. MS, DHQ Hospital Karak.
5. DAO Karak.
6. Deputy Director (IT) Health Department.
7. PS to Secretary Health, Khyber Pakhtunkhwa.
8. PS to Special Secretary Health.
9. Doctor concerned.


(Daulat Khan)
Section Officer (E-II)

c.T.c

S

Counsel

Tah

Attested
True Copy

2

8

-B-

MOST IMMEDIATE

Annexure

Dated: 25/01/2016

To

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

D. No: 838
29/1/2016
Soni

Subject:

ILLEGAL RECOMMENDATIONS FOR THE IMMATURE TRANSFER OF
DR. AFTAB AHMED (BPS-17) BY DHO KARAK.

Sir,

The undersigned intimates you:

AJLE
1/2/16

- (1) That the undersigned is serving as a medical officer on regular basis (BPS-17) in health deptt; KPK since 12-12-1998 and is the holder of postgraduate qualification in Public Health.
- (2) That the undersigned assumed the charge of District Coordinator Lady Health Workers (LHWs) programme (BPS-17) Karak dated 01-05-2015 (on record).
- (3) That any kind of written/ proved allegations are ^{not} recorded against the undersigned since assuming the charge on 01-05-2015 (as above).
- (4) That the DHO Karak (few weeks ago) has recommended the undersigned's name for the illegal/immature transfer to be replaced by his blood relative (nephew) namely Dr. Majid (the freshly appointed contractee M.O) by doing favoritism at Karak which is against the rules and law.
- (5) That it is requested that the undersigned's name may please be deleted/ removed from the concerned summary may have names of other officials also submitted by DHO Karak to your office as it is baseless and against the rules and law for which the undersigned may knock at the door of the honorable court, accordingly.

It is submitted for approval, please

Thanking You

Your's Obediently

Dr. Aftab Ahmed
District Coordinator
LHW's Programme Karak

Aftab Ahmed 25/1/16

C.T.C

Cah
counsel
Attested
copy



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 17th March-2016

NOTIFICATION

No.SO(E)H-II/4-1/2016 The Competent Authority is pleased to transfer the following Doctors with immediate effect in the best public interest.

S.No	Name of Doctor	From	To
1	Dr. Haroon Taj Medical Officer (BPS-17)	DHQ Hospital Karak	DHO Office Karak against the vacant post of DTO
2	Dr. Arshad Sohail Medical Officer (BPS-17)	Civil Hospital Bahadar Khel Karak	Women & Children Hospital Karak against the vacant post
3	Dr. Aftab Ahmad Medical Officer (BPS-17)	Coordinator LHW Program DHO Office Karak	Type-C Hospital Takhti Nasrati Karak against the vacant post
4	Dr. Mudasir Bilal Medical Officer (BPS-17)	Type-C Hospital Takhti Narati Karak	Women & Children Hospital Karak against the vacant post
5	Dr. Baseer Ullah Medical Officer (BPS-17)	Type-C Hospital Takhti Narati Karak	Women & Children Hospital Karak against the vacant post
6	Dr. Shafiqah Khial WMO (BPS-17)	Type-D Hospital Latamber Karak	Type-D Hospital Takhti Nasrati Karak
7	Dr. Wahid Ullah Medical Officer (BPS-17)	Type-C Hospital Takhti Narati Karak	Type-D Hospital Latamber Karak
8	Dr. Abid Imran Medical Officer (BPS-17)	Type-C Hospital Takhti Narati Karak	Type-D Hospital Latamber Karak

- Sd -
SECRETARY HEALTH
HEALTH DEPARTMENT

Endst. of even No. & Date.

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Coordinator Emergency Operation Centre Peshawar.
4. District Health Officer Karak.
5. MS DHQ Hospital Karak.
6. MS Women and Children Hospital Karak.
7. District Accounts Officer Karak.
8. Deputy Director (IT) Health Department.
9. PA to Deputy Secretary-I, Health Department.
10. PA to Additional Secretary (E), Health Department.
11. PA to Project Manager DHIS office of DGHS Peshawar
12. PS to Secretary Health, Khyber Pakhtunkhwa.
13. Doctors concerned.

(Signature)
SECRETARY HEALTH

C.T.C

(Signature)
Counsel
Attested
True Copy

MOST IMMEDIATE

(By Ordinary Post) ✓

From:

Dr. Aftab Ahmad
Medical Officer, Health Department Karak.

Dated: 10-04-2016

To:

The Chief Secretary to Govt. of Kyber Pakhtun Khwa Peshawar

Subject: **MOST URGENT MODIFICATIONS ARE NEEDED TO BE DONE IN TIME UNDER THE RULES /LAW IN NOTIFICATION NO. SO (E) H-II/4-1/2016 DATED 17TH MARCH 2016 ESTABLISHED FOR IMMATURE TRANSFERS OF MEDICAL OFFICERS (BPS-17) AT KARAK.**

Sir;

Reference quoted in subject above (Copy enclosed Annexure -A), it is submitted in the response;

1. That the undersigned is serving as a civil, servant on regular basis (BPS-17) in health department KPK since 12/12/1998.
2. That the undersigned is the holder of post graduate qualification in the field of public health. (on record)
3. That being public health manager the undersigned civil services were posted as a coordinator of lady health workers (LHWS) Program Karak vide notification No, SO(E) H-II/4-1/2015 dated 03 April 2015 (Copy enclosed in annexure - B) and the undersigned assumed the charge on 01/05/2015 at DHO Office Karak. (On record)
4. That the District Health Officer submitted one of the written summary to Govt: of KPK Health Department Peshawar may be in January 2016 for transfers of few Doctors (on record) in which the undersigned's name was proposed for transfer to RHC jandari Karak and my existing position of coordinator to be replaced/occupied by one namely Dr. Majid (Freshly appointed) vide Government of Khyber Pakhtunkhwa Health Department Notification No. 21st Oct, 2015 to be implemented from 20th March, 2015 (Dr. Majid is in serial no. 69 in the above notification) (Copy enclosed in annexure -C - Eleven Paged) who is blood relative (Nephew) of DHO Karak (Dr. Rasool Jan) under favoritism for which in the response the undersigned submitted Proper written application of dated 25-01-2016 in my defense (Copy enclosed in annexure - D).
5. That one another summary was submitted to secretary to Government of KPK, Health Department by DHO Karak few weeks ago and on my utmost surprise the undersigned's civil services has been illegally/immaturely transferred to type -C

C.T.C

Tah
Counsel

TRUE COPY

Hospital Takht-e-Nasrati Karak (See annexure - A, above) without completing probation period (which is against the rules). Moreover, any substitute has not been provided in the said notification to serve the LHWs program at Karak.

- 6. That one namely Dr. Haroon Taj (MO-BPS-17) who is Pulmonologist (FCPS) Specialist Cadre (in serial No. 1 in above notification) has been posted to DHO office to serve as a District TB Officer - DTO which is management cadre post which is against the Govt; Policies. The said Doctor may not agree also.
- 7. That ultimately, the undersigned assumed the charge at type -C Hospital Takht-e-Nasrati Karak on dated 01-04-2016 forenoon vide DHO Karak letter no. 109/PF, dated 11/04/2016 (Copy enclosed in annexure -E)
- 8. That on my utmost surprise the secretary to Govt; of KPK Health Department established a notification vide no. SO(E)H-II/4-1/2016 (Copy enclosed in annexure - F) for the transfer of above Dr. Majid (without completing his probation period) which is against the law/rules.
- 9. That in case of non compliance in the matter the undersigned will ultimately knock at the door of honourable court / Services Tribunal KPK, accordingly.

REQUEST:

Your good self is here by intimated through this written application/legal notice that the undersigned's name (Serial No. 03) may please be removed /deleted from the above notification of dated 17-03-2016 (as per rules / Law) within concerned days (after receiving this application through ordinary post) otherwise I am sorry that I will submit the concerned suit against the above story in the above court, accordingly. Moreover, the undersigned is confident that have done nothing wrong. It is submitted for approval please.

Thanking you,

Aftab Ahmad
10/4/16

Dr. Aftab Ahmad
Medical Officer
Type C Hospital Takht-e-Nasrati Karak
Cell #: 0346-8110578

C.T.C

Aftab Ahmad
Counsel
Attested
True Copy

D-1

(13)

MOST IMMEDIATE

By Registered Post

Dated: 24-03-2016

From:

Dr. Aftab Ahmad
District Coordinator
Lady Health Worker Program (LHWs)
Karak

To

The secretary to Govt. of Kyber Pakhtun Khwa
Health Department Peshawar.

Subject: MOST URGENT MODIFICATIONS ARE NEEDED TO BE DONE IN TIME UNDER THE RULES / LAW IN NOTIFICATION NO. SO (E) H-II/4-1/2016 DATED 17TH MARCH 2016 ESTABLISHED FOR IMMATURE TRANSFERS OF MEDICAL OFFICERS (BPS-17) AT KARAK.

Memo:

Reference quoted in subject above (Copy enclosed in Annexure -A), it is submitted in the response;

1. That the undersigned is serving as a civil servant on regular basis (BPS-17) in health department KPK since, 12/12/1998.
2. That the undersigned is the holder of post graduate qualification in the field of public health. (on record)
3. That being public health manager the undersigned civil services were posted as a coordinator of lady health workers (LHWs) Program Karak vide notification No. SO(E) H-II/4-1/2015 dated 03 April 2015 (Copy enclosed in annexure - B) and the undersigned assumed the charge on 01/05/2015 at DHO Office Karak. (On record)
4. That the District Health Officer Submitted one of the written summary to Govt. of KPK Health Department Peshawar may be in January 2016 for transfers of few Doctors (on record) in which the undersigned's name was proposed for transfer to RHC Jandari Karak and ~~my~~ existing position of coordinator to be replaced/occupied by one namely Dr. Majid (Freshly appointed) who is blood relative (Nephew) of DHO Karak (Dr. Rasool Jan) under favoritism for which in the response the undersigned submitted Proper written application of dated 25-01-

C.T.C

Handwritten bracket on the left margin.

Tah

counsel

Act
File

2016 in my defense vide your office Dairy No. 838 dated 29-01-2016 (Copy enclosed in annexure - C) :

- 5. That one another summary was submitted to your office by DHO Karak few weeks ago and on my utmost surprise the undersigned's civil services has been illegally/immaturely transferred to type -C Hospital Takht-e-Nasrati Karak (See annexure - A, above) without completing probation period (Which is against the rules). Moreover, any substitute has not been provided in the said notification to serve the LHWs program at Karak.
- 6. That one namely Dr. Haroon Taj (MO-BPS-17) who is Pulomonologist (FCPS) Specialist Cadre (in serial No. 1 in above notification) has been posted to DHO office to serve as a District TB Officer - DTO which is management cadre post which is against the Govt: Policies. The said Doctor may not agree also.
- 7. Now reference ~~above grounds and facts~~ the Polio program which is national Emergency served by Lady Health Workers will be suffered badly at Karak without supervision by the undersigned.
- 8. That in case of non compliance in the matter the undersigned has already intimated your good self through written application of dated 25-01-2016 (See annexure - C) that the undersigned will ultimately knock at door of honourable court / Services Tribunal KPK, accordingly.

c.T.C

[Large handwritten bracket on the left side]

Tah

Counsel
Attested
True Copy

REQUEST:

Your good self is here by intimated through this written application/legal notice that the undersigned's name (Serial No. 03) may please be removed /deleted from the above notification of dated 17-03-2016 (as per rules / Law) within ten days (after receiving this application through registered post) otherwise I am sorry that I will submit the concerned suit against the above story in the above court, accordingly. Moreover, the undersigned is confident that have done nothing wrong. It is submitted for approval please.

Thanking you,

[Signature]
24/3/16

Dr. Aftab Ahmad
Coordinator LHWs Program
Karak
Cell #: 03468110578

(5) E

(15)

Ann - E -

(2)

Annexure.



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 21st October-2015

NOTIFICATION

NO. SOH(E-II)3-18/2015 The Competent authority is pleased to regularize the services of the following Medical Officers (BS-17) working on contract basis under the Khyber Pakhtunkhwa Medical Officers and Dental Surgeons (Regularization of Services) Act, 2015 with effect from 20th March, 2015.

S.No.	NAME OF DOCTORS	PLACE OF POSTING
1.	Dr. Muhammad Tahir S/O Rehmat Ali	Khalifa Gulnawaz Teaching Hospital Bannu
2.	Dr. Irum Rahim D/O Abdur Rehman	Khalifa Gulnawaz Teaching Hospital Bannu
3.	Dr. Akbar Jamal S/O Gul Jamal	Khalifa Gulnawaz Teaching Hospital Bannu
4.	Dr. Rafique Muhammad Khan S/O Tale Muhammad Khan	Khalifa Gulnawaz Teaching Hospital Bannu
5.	Dr. Sajjad Anwar S/O Amanullah Khan	Khalifa Gulnawaz Teaching Hospital Bannu
6.	Dr. Syed Usman Jalal Shah S/O S.M Jalal Shah	Khalifa Gulnawaz Teaching Hospital Bannu
7.	Dr. Syed Akhtar Khan S/O Akbar Ali Jan	Khalifa Gulnawaz Teaching Hospital Bannu
8.	Dr. Farooq Nawaz s/o Sher Nawaz	KGNTH Bannu
9.	Dr. Farhad s/o Ghulam Rahman, Medical Officer (BS-17)	BHU Palosa Torghar
10.	Dr. Dayar Khan S/O Sher Ahmad, Medical Officer (BS-17)	BHU Darbani Torghar
11.	Dr. Khalid S/O Amir Bahadar, Medical Officer (BS-17)	BHU Maira Madu Khel, Torghar
12.	Dr. Salman Gohar S/O Gohar Ali Khan, Medical Officer (BS-17)	BHU Judbah, Torghar
13.	Dr. Nawab Ali Khan S/O Abdul Hameed Khan, Medical Officer (BS-17)	BHU Shingal Dat Torghar
14.	Dr. Muhammad Nasir Waheed s/o Abdul Waheed	CD Zaryab Colony, Peshawar
15.	Dr. Abdur Rehman s/o Sakayat Khan	RHC Badaber, Peshawar.
16.	Dr. Majid Jalil Qureshi s/o Musa	RHC Badaber Peshawar.
17.	Dr. Nasir Ayaz s/o Muhammad Ayaz	Services Hospital Peshawar.
18.	Dr. Imtiaz Ahmad s/o Shehzad Khan	Moulvi Ameer Shah Memorial Hospital Peshawar
19.	Dr. Syed Shah Faisal s/o Syed Chan Badshah	Moulvi Ameer Shah Memorial Hospital, Peshawar
20.	Dr. Saeed ul Haq s/o Fazl-e-Haq	Moulvi Ameer Shah Memorial Hospital, Peshawar

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counsel

Secretary General,
Govt. of Khyber Pakhtunkhwa,
Health Department.

21.	Dr. Abe Kausar Farah s/o Muhammad Khan	Mouli Ameer Shah Memorial Hospital, Peshawar
22.	Dr. Nasreen D/O Gulab Khan	Mouli Ameer Shah Memorial Hospital, Peshawar
23.	Dr. Shumaila Malik D/O Malik Farid Khan	Mouli Ameer Shah Memorial Hospital, Peshawar
24.	Dr. Shaista Sultan D/O Sultan Gul	Mouli Ameer Shah Memorial Hospital, Peshawar
25.	Dr. Khalil Khan s/o Haji Jan Muhammad	CH Shabbadar, Charsadda.
26.	Dr. Masood Shah s/o Muhammad Shah	CH Shabbadar, Charsadda.
27.	Dr. Muhammad Yaseen s/o Muhammad Amin	RHC Jamalabad Charsadda
28.	Dr. Yasir Hayat s/o Fazal Hayat	Bacha Khan Medical Complex Swabi
29.	Dr. Akbar Ali s/o Sher Zada Khan	Bacha Khan Medical Complex Swabi
30.	Dr. Muhammad Sohail Farooqi s/o Muhammad Aqeel Farooqi	Bacha Khan Medical Complex Swabi
31.	Dr. Rafiq Khan s/o Mehran Bacha	Bacha Khan Medical Complex Swabi
32.	Dr. Qadar Khan s/o Amir Rehman	Bacha Khan Medical Complex Swabi
33.	Dr. Naveed s/o Mudassar Shah	Bacha Khan Medical Complex Swabi
34.	Dr. Hamid Ali s/o Liaqat Ali Khan	Bacha Khan Medical Complex Swabi
35.	Dr. Sohrab Ali s/o Aziz Ullah Khan	Bacha Khan Medical Complex Swabi
36.	Dr. Fakhra Anees Khan D/O Muhammad Anis Khan	Bacha Khan Medical Complex Swabi
37.	Dr. Pervez Khan s/o Shad Muhammad	Bacha Khan Medical Complex Swabi
38.	Dr. Muddasir Iqbal s/o Ruidel Khan	Bacha Khan Medical Complex Swabi
39.	Dr. Farooq Ajmal s/o Ajmal Khan	Bacha Khan Medical Complex Swabi
40.	Dr. Ishfaq Ali s/o Khan Zada	Bacha Khan Medical Complex Swabi
41.	Dr. Amir Hassan s/o Faqir Muhammad	Bacha Khan Medical Complex Swabi
42.	Dr. Syed Muhammad Kashif s/o Syed Noor ul Basar	Bacha Khan Medical Complex Swabi
43.	Dr. Siraj Hussain s/o Mehruban Shah	BRU Gani Chitral,
44.	Dr. Imran Shams s/o Shams uz Zaman	CD Shewa, Swabi
45.	Dr. Hazrat Ali Shah s/o Mufarikh Shah	CH Kalu Khan, Swabi
46.	Dr. Jamal Nabi Khan s/o Mumtaz Hussain	RHC Sheikh Jana, Swabi
47.	Dr. Fazil Hadi s/o Mohammad Shahid	CD Karnel Sher Kelley, Swabi
48.	Dr. Rabia D/O Jehanzeb	RHC A/Kunda, Swabi
49.	Dr. Asad Ghani s/o Fazal Rabbi	CH Kalu Khan, Swabi

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 course

No. of students
 Dr. C. T. C. Health Department

50.	Dr. Ashiq Muhammad s/o Khan Muhammad	DHQ Hospital Mardan
51.	Dr. Zafar Ullah s/o Ghufanullah	DHQ Hospital Mardan
52.	Dr. Kamran ud Din s/o Haji Rahsid Din	MMC Mardan
53.	Dr. M. Asif s/o Istifa Nosh	MMC Mardan
54.	Dr. S. Asad us Samad s/o S. Noo us Samad	MMC Mardan
55.	Dr. Imran Khalil s/o Muhammad Khalil	MMC Mardan
56.	Dr. Aslam Gul s/o Zeenat Gul	MMC Mardan
57.	Dr. Waqar Ahmad s/o Dawa Khan	MMC Mardan
58.	Dr. Muhammad Shafiq s/o Muhammad Ayaz	MMC Mardan
59.	Dr. M. Wahid Zia s/o Muhammad Javed Zia	MMC Mardan
60.	Dr. Umar Said Khan s/o Jahan zeb	MMC Mardan
61.	Dr. Kashif Ali Shah s/o S. Imtiaz Ali Shah	MMC Mardan
62.	Dr. Rohail Mian Hayat s/o Mian Junwan ud Din	MMC Mardan
63.	Pir Akbar Said s/o Pir Mian Jan Said	MMC Mardan
64.	Dr. Mehreen Lajbar D/O Lajbar Khan	MMC Mardan
65.	Dr. Muhammad Yousaf s/o Muhammad Rejeue	At the disposal of DHO Karak
66.	Dr. Amir Jamal s/o Dr. Muhammad Jamal	THQ B.D Shah Karak
67.	Dr. Qudrat Ullah s/o Gul Hassan Bad Shah	Type D Hospital Sabirabad Karak
68.	Dr. Umaro Jan Arida D/O Mushari Jan	Type D Hospital Sabirabad Karak
69.	Dr. Majid Khan s/o Razi Bad Shah	At the Disposal of DHO Karak
70.	Dr. Inamullah s/o Parid Khan Tofan	DHQ Hospital Karak
71.	Dr. Muhammad Altaf Rehman s/o Mir Adat Khan	BHU Serbadakhel, Bannu
72.	Dr. Asid Khan s/o Awal Khan	Category C Hospital Sarai Naurang, Lakki Marwat
73.	Dr. Khayat Ullah s/o Karam Shah	CH Tajori, Lakki Marwat
74.	Dr. Nazia Gul D/O Haji Muhammad Ashiq	DHQTH D.I.Khan
75.	Dr. Sidra Hayat D/O Sikandar Hayat	MMMTH D.I.Khan
76.	Dr. Moazzam Khan s/o M. Iqbal Khan	CH Khanaspur Ayubia Abbottabad.
77.	Dr. Tariq Aziz s/o Aziz ur Rehman	RHC Kala Pani, Abbottabad
78.	Dr. Ibrar Ahmad s/o Gul Nar	CH Boi Abbottabad
79.	Dr. Faiz Munsif D/O Munsif Khan	BHU Bagnotar, Abbottabad

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[Handwritten Signature]

Counselor
Attested
True Copy

Division Officer (I),
CH Khanaspur Ayubia
Abbottabad

18	Dr. Arshad Hussain s/o Taj Muhammad	DHQ Hospital Batkhela	04.11.2014 to 19.03.2015
19	Dr. Habib Nabi s/o Mustafa Kamal	DHQ Hospital Batkhela	04.11.2014 to 19.03.2015
20	Dr. Abid Manan s/o Hazrat Manan	DHQ Hospital Batkhela	04.11.2014 to 19.03.2015
21	Dr. Azmat Shah s/o Muhammad Shah	DHQ Hospital Batkhela	04.11.2014 to 19.03.2015
22	Dr. Karim ur Rehman s/o Amin ullah Khan	DHQ Hospital Batkhela	04.11.2014 to 19.03.2015
23	Dr. Gohar Rehman Khan s/o Khalil ur Renman	DHQ Hospital Batkhela	04.11.2014 to 19.03.2015
24	Dr. Ikram Ullah s/o Sherin zada	DHQ Hospital Batkhela	04.11.2014 to 19.03.2015
25	Dr. Fazal Rabani s/o Hajj Badesh	At the disposal of DHO Swat	04.11.2014 to 19.03.2015
26	Dr. Khurshid Ali s/o Main Zareen Jah	At the disposal of DHO Dir Lower	04.11.2014 to 19.03.2015
27	Dr. Muhammad Tariq Khan S/O Muhammad Shah Khan	RHC Khazana Swat	04.11.2014 to 19.03.2015
28	Sadaqat Hussain s/O Masood Khan	RHC Badaber Peshawar	04.11.2014 to 19.03.2015
29	Amjad Ali S/O Ahmad Khan	THQ Dargal Malakand	04.11.2014 to 19.03.2015
30	Dr. Muner Dar Khan s/o Nam Dar Khan	BHU Mughal Kot FR D.I. Khan	04.11.2014 to 19.03.2015
31	Muhammad Hussain S/O Muhammad Saraf	CH Chakisar Shangla	13.12.2014 to 19.03.2015

NOTE: The above Medical Officers shall strictly governed under the Khyber Pakhtunkhwa Medical Officers and Dental Surgeons (Regularization of Services) Act-2015. The Seniority shall be determined under the said Act. Moreover, in case of any fake information provided to the Health Department with regard to their qualification, absence, training or any misconduct before the Regularization, their services shall be automatically terminated.

SECRETARY HEALTH,
Govt. of Khyber Pakhtunkhwa

Endst. No. & Date even.

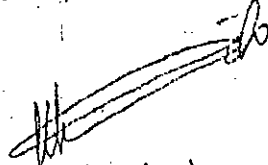
Copy to:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Registrar Peshawar High Court Peshawar.
3. Director General Health Services, Khyber Pakhtunkhwa Peshawar.
4. Director Health Services FATA Peshawar.

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5. Chief Executive, KGNT Hospital Bannu.
6. Chief Executive, SGTH Swat.
7. Chief Executive, MMT Hospital D.I.Khan.
8. Project Director, DHIS Khyber Pakhtunkhwa, Peshawar
9. PSO to Chief Minister Khyber Pakhtunkhwa.
10. PSO to Chief Secretary Khyber Pakhtunkhwa.
11. All the District Health Officers of the District mentioned above.
12. All the Medical Superintendents of the District mentioned above.
13. All the District Accounts Officer of the District mentioned above.
14. Director Information, Khyber Pakhtunkhwa.
15. Deputy Director (IT) Health Department.
16. Section Officer (Lit-I), Health Department.
17. PS to Secretary Establishment Department.
18. PS to Minister for Health Khyber Pakhtunkhwa.
19. PS to Secretary Health Department.
20. PA to Additional Secretary (Establishment) Health Department.
21. PA to Deputy Secretary-I, Health Department.
22. Doctors concerned.


(Daulat Khan)
SECTION OFFICER (E-II)

C.T.C


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(20) - ANK - F -

**DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

No. 3081 /E-I/A-165

Dated: 03/06/2016

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

E-Mail Address K.P.Kdghs@yahoo.com
Office # 091-9210269
Exchange # 091-9210187, 9210196
Fax # 091-9210230

To,

The Secretary to Govt: of
Khyber Pakhtunkhwa Health
Department Peshawar

Subject:

**MOST URGENT MODIFICATION ARE NEEDED TO BE DONE IN
TIME UNDER THE RULES/LAW IN NOTIFICATION DATED
17.03.2016.**

Dear Sir,

With reference to your letter No. SO(H)E-II/4-1/2015/Dr. Aftab Ahmad dated 10.05.2016, on the subject noted above and to state that Dr. Aftab Ahmad MO BPS-17 was working as District Coordinator LHW's Program District Karak since 01.05.2015, Although his transfer is premature. However, his transfer was recommended by the DHO, Karak on the complaint of LHW's. Also he did not appear before the enquiry committee that was constituted to conduct enquiry as regard the complaint lodged by 17 LHWs.


Your's faithfully,

[Signature]
03/06/16
**DIRECTOR GENERAL HEALTH
SERVICES, Khyber Pakhtunkhwa PESHAWAR.**

03/06/16

C.T.C

[Signature]
Attested
True Copy

		
<p>ایڈووکیٹ/ڈپٹی چیف جسٹس بار کونسل ابار ایسوسی ایشن خیبر پختونخواہ</p>	<p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p>	
<p>رابطہ نمبر: 0345-9109223</p>		

بعدالت جناب:

<p>منجانب: ایڈوائٹ</p>	<p>دعوی:</p>
	
<p>کلیئرنگ و سٹریٹ</p>	<p>موضوع: جرم: تھان:</p>

باعت خرید آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پر دی و جواب دی کاروائی متعلقہ

آن مقام پر شہرہ جہاں محمد علی بھٹو صاحب کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو راضی نامہ کرنے و تقریر کرنا و فیصلہ برطنت دینے جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں بد دستخط کرنے کا اختیار ہوگا، نیز ضرورت ہوتی ہو تو کسی طرف یا اہل کی برآمدگی اور منسوفی نیز دائر کرنے اہل نگرانی و نظربانی و پروری کرنے کا اختیار ہوگا اور ضرورت ہوتی ہو تو مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ماتحت ہر ذمہ منطور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جان التوائے مقدمہ کے حساب سے ہوگا وہ وکیل موصوف و قبول کرنے کا اختیار ہوگا کوئی تاریخ پیشی مقام دورہ یا عدسے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندرجہ ہے

Attested & Signed
M. Tahira
[Signature]

المرقوم: 15-07-16

العبد
مقام

تاریخ: 15-07-16

[Signature]
Dr. Aggas

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. 772/2016

Dr. Aftab Ahmad S/o Muhammad Ali Khan.....Appellant

Versus

01. The Secretary, Health Department, Khyber Pakhtunkhwa, Peshawar.
02. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
03. The Govt. of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat, Peshawar.
04. Dr. Majid Khan, Coordinator NP for FP & PHC, Karak.
05. District Health Officer Karak.....Respondents

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1, 2, 3 & 5

Preliminary Objections:-

1. That the appellant has no cause of action/locus standi.
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 the present form and also in the present circumstances of the issue.
5. That the appellant has filed the appeal in non proper form and may be dismissed.
6. That the appellant has not come to this Honorable Tribunal with clean hands.
7. That the appeal is time barred.

ON FACTS:

1. Pertains to record.
2. Pertains to record.
3. Incorrect. The appellant has to prove the same.
4. Pertains to record.
5. Incorrect. The recommendation of the District Health Officer Karak was not based on nepotism.
6. Pertains to record.
7. Pertains to record.
8. Incorrect. The appellant was transferred on the complaint of 17 LHWs. The LHWs made a complaint against the appellant on which an enquiry was conducted but the appellant did not appear before the enquiry committee. Complaint of LHWs is annex-A and report of enquiry committee is annex-B.

9. Pertain to record. However, it is further elaborated that on the disciplinary grounds the appellant was further transferred from THQ Takht-e-Nasrati to D I Khan. Transfer order is annexed as C.
10. The appellant has got no cause of action to file instant appeal.


GROUND:

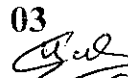
- a. Incorrect. The appellant was treated in accordance to law and the rules and no right of the appellant was violated.
- b. Incorrect. As already mentioned in the above para that the transfer order of the appellant is according to law and rules.
- c. Irrelevant. No violation of any rules has been made by the respondents.
- d. Incorrect. The respondent No. 04 was working as Medical Officer in BPS-17 on Adhoc basis and his service was regularized on 20/03/2015.
- e. Incorrect. The respondent No. 04 has been transferred according to law and the rules.
- f. Incorrect. No nepotism has been involved in the instant transfer on the part of the respondents.
- g. Pertains to record.
- h. Need no comments.
- i. Incorrect. The impugned order has been issued in light of section 10 of Civil Servant Act 1973.
- j. As in para-08 of the facts.
- k. Incorrect. Transfer of civil servant is a routine work.
- l. Other points will be raised during the time of arguments.


Prayer

It is therefore, humbly requested that the instant appeal may please be dismissed with cost.

Secretary, Health Department,
Khyber Pakhtunkhwa, Peshawar.
Respondent No 01


Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
Respondent No 03


11/5/17


District Health Officer, Karak.
Respondent No 05

حساب نکالی

گزارش کی جاتی ہے۔ ہم جملہ HSS کے کو جو موجودہ ماحول میں

کام کرنے میں دشواری کا سامنا کرنا پڑا ہے۔ کیونکہ پیارے ڈیپارٹمنٹ

کو آرڈر پیپر کو لے جو اس کے ساتھ کام کرنے کا طم لیا گیا ہے۔ اور ان بارے

کرنے کا طم لیا گیا ہے۔ اور یہ مسئلہ میں وہ کسی نہ کسی HSS کے ساتھ

عظیم پیمانہ پر روک لکھنے میں وہ نہ بھاری مسائل کو سمجھنے میں اور

لے کام کو اور مہلک ڈیوٹی کے اوقات ^{تمام} میں ہے۔ یہ HSS

جیسے کھی گئے حال کرنے میں یا بیس کرنے میں کسی کسی مسئلہ

کا بیان کرنے کھی کسی مسئلہ کا بیان کرنے جو تمام عظیم مسائل میں

ہے۔ کیونکہ انہی لپٹ آپ کو بھی عورت ذات کسی دفتر میں اس

حاصل کی گونیا یہ صاحب عیہ میں اس اوقات میں بیس کرنے کے بل

میں اور یہ سلسلہ کھی رات کے میں بھی جاری رکھنا ہے

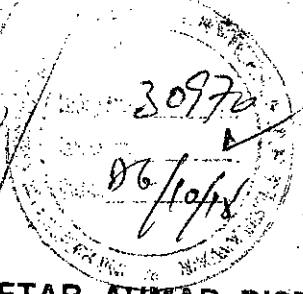
لہذا ان صاحب عیہ باقی مہمان بیس اس کا متبادل فراہم کرک

اس عیہ کی جاری جان کھی رات

یہ کام مہتمم دار لکھی عیہ میں واقع ہے

To

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.



1013

**Subject: ENQUIRY REPORT AGAINST DR. AFTAB AHMAD DISTRICT
COORDINATOR LHW,S PROGRAM DISTRICT KARAK.**

R/Sir,


P-1007

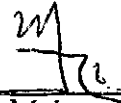
Reference letter No. 14281-89/E.I dated 18.08.2015.

The inquiry conducted on 03.09.2015, statement of LHS recorded, ADC was investigated and Dr. Aftab Ahmad Coordinator LHW Program District Karak was requested to give his written statement in his defence.

But till date he has not submitted his written statement, he is using delaying tactics. We both think that he has no argument to defend himself.

So it is recommended that ex-party unilateral action should be taken against him in the light of "Right man for the Right Job".


Dr. Ishfaq Ahmad
PMO /C Takht-e-Nasrati,
Inquiry Officer


Dr. Muhammad Daraz
Deputy DHO Bannu,
Inquiry Officer,

Mian Waheed Gul



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar the 4th July-2016

NOTIFICATION

No.SO(H)E-II/4-1/2016. The Competent Authority is pleased to place the services of Dr. Aftab Ahmad Medical Officer (BS-17), Type-C Hospital Takhti Nasrati Karak at the disposal of District Health Officer, D.I. Khan on administrative grounds with immediate effect.

**SECRETARY HEALTH
HEALTH DEPARTMENT**

Endst of even No. and Date.

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar w/r to his letter No. 3697-98/E.I (A-165) dated 04.07.2016.
3. District Health Officer, Karak/D.I.Khan
4. District Accounts Officer, Karak/D.I.Khan
5. Deputy Director (IT) Health Department.
6. Coordinator HSRU, Health Department.
8. PS to Secretary Health, Khyber Pakhtunkhwa.
9. Doctor concerned.


(Obaidullah)
Section Officer (E-II)