


# FORM OF ORDER SHEET

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

**Appeal No. 72/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/05/2024	<p>The appeal of Dr. Aftab Ahmad presented today by him. It is fixed for preliminary hearing before Single Bench at Peshawar 31.05.2024. Parcha Peshi given to the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

**Before the Honourable Service tribunal Khyber Pakhtunkhwa, Peshawar.**

service appeal No: 726/2024

Dr. Aftab Ahmed

S/o Prof; dr. Mohammad alikhattak(late)

Principal medical officer (BS-19), DHQ Hospital, Karak.

R/O H#17, street # 2, Sector E-2, Phase I, Hayatabad, Peshawar

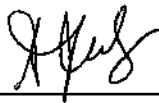
..... Appellant

**Versus**

1. The Chief Secretary to the government of Khyber pakhtunkhwa, Peshawar.
2. The Secretary to the Government of Khyber pakhtunkhwa, Health department, Peshawar.
3. Dr. Abdul wahab, medical superintendent, DHQ Hospital, Karak ..... Respondents.

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17/5/2024

Dated: 21.05.2024

**Appellant (in person)**

**Before the Honourable Service tribunal Khyber Pakhtunkhwa, Peshawar.**

Service appeal No: 726 /2024

Dr. Aftab Ahmed

S/o Prof; Dr. Mohammad Ali khattak (late)

Principal medical officer (BS-19), DHQ Hospital, Karak.

R/O H #17, street # 2, Sector E-2, Phase I, Hayatabad, Peshawar ..... Appellant

**Versus**

1. The Chief Secretary to the government of Khyber pakhtunkhwa, Peshawar.
2. The Secretary to the Government of Khyber pakhtunkhwa, Health department, Peshawar.
3. Dr. Abdul wahab, medical superintendent, DHQ Hospital, Karak ..... Respondents.

Under section 4 of Khyber pakhtunkhwa service tribunal Act 1974 the service appeal against the unfair, improper, unlawful, incorrect, against the policies of eligibility for transfer/posting in cadres during availing period of probation of promotion to BS-19 ORDER of notification No; SOH(E-V)2-2/2023 of 16.11.2023 whereby a junior, freshly promoted as a District specialist in anaesthesia (BS-19) in DHQ Hospital Lakki marwat, green eyed respondent 03 ( whose status was illegally established before the above impugned order of 16.11.2023 as "serving as a principal medical officer(PMO) BS-19 in DHQ Hospital Karak against the vacant post of principal medical officer(PMO) BS-19 for the unauthorized drawl of monthly pays at DHQ Hospital Karak" by the fictitious letter of arrival/charge reports established by the then medical superintendent DHQ Hospital Karak (Dr. Saleem) vide letter No: 156/Admin/DHQH/KK of dated 01.02.2024 under intimation to the P.S. of respondent 02) has been assigned (respondent 03 has further been mentioned fictitiously as a Senior District specialist anaesthesia BS-19 along with the designation of PMO BS-19, DHQH Karak) the unauthorized/unlawful additional charge of the post of medical superintendent DHQ Hospital Karak in addition to his own duties till further orders. On the other hand, the appellant being eligible, senior, experienced, regular principal officer (BS-19), holder of HEC recognized post graduate qualification in public health (mandatory qualification for management) has been ignored and has been made subordinate to ineligible, unauthorized, specialist cadre in Anaesthesiology, politically oriented green eyed respondent 03 that have to be deputed back to his original position in DHQ Hospital Lakki Marwat, accordingly in order to complete his concerned probation period after his promotion at that station even till the termination of probation by his appointing authority, accordingly. In such circumstances, the respondents 01 or 02 may kindly be ordered or directed to assign the legal charge of medical superintendent (BS-19) DHQ Hospital Karak to the appellant accordingly as being senior, eligible, qualified, trained, experienced and skilled in the matter.

Respectfully Sheweth

The undersigned applicant offers and submits as under:

- A. That the appellant is serving in provincial health department Khyber Pakhtunkhwa for the last 26 Years i.e. 12.12.1998 and at present working as a Principal medical officer

(PMO) BS-19 on regular basis at DHQ Hospital (KDA) Karak.

(Attested copy of whole service experience certificate of appellant is annexed in Annexure A)

- B. That appellant is regular principal medical officer(PMO-BS-19) and has no pending probation period to be completed after promotion to BS-19 and is the holder of HEC recognized post graduate qualifications (Diploma in public health , IT, Public administration, multiple management trainings /courses / seminars, workshops), etc;

(Attested copy of post graduate qualification of the appellant is annexed in Annexure B).

- C. That the appellant submitted one proper written application to respondent 02 regarding the posting of the appellant as a medical superintendent DHQ Hospital Karak which was duly recommended by DGHS KPK and was forwarded to respondent 02 under direction to Medical Superintendent DHQ Hospital Karak to direct the appellant to submit the prescribed on line application to respondent 02 in the matter vide the Director General Health Services KPK Peshawar letter NO: 1240-41/E-I of dated 25.01.2023.

( Attested copy as above recommendation letter submitted is annexed in Annexure C )

- D. That reference to Annexure C above remarks, the respondent 02 was intimated that the appellant has already submitted prescribed on line application to respondent 02 in time before on dated 30.12.2022, accordingly.

( The attested copy of prescribed on line application submitted is annexed in Annexure D )

- E. That the respondent 03 is junior to the appellant and in the year 2022, the respondent 03 was serving in specialist cadre in anaesthesia in DHQ Hospital karak, was promoted to the position of District specialist in anaesthesia (BS-19) vide respondent 02 notification No: SOH-EHD.3-5/2022 of dated 03.03.2022 and was posted as a senior District specialist in anaesthesia to DHQ Hospital Lakki Marwat to actualize the position (BS-19)along with the completion of one year probation period accordingly. The respondent 03 was not posted to the home station Karak due to the non-availability of the vacant post of District specialist Anaesthesia (BS-19) at DHQ Hospital Karak. Moreover, the copy of such order / notification of such promotion of respondent 03 to BS -19 to be produced before this Honourable service Tribunal during trials bythe respondent 02.

- F. That respondent 03, after his promotion to BS-19, actualized the position(BS-19) of senior District specialist in Anaesthsiology at DHQ Hospital Lakki Marwat (on record) and provided his specialized services at the station for few months only that in the meanwhile, the civil services of the green eyed respondent 03 were fictitiously. Illegally, by unauthorized technique/approach/way established by the then MS/DHQH, Karak (**Dr. Mohammad Saleem who was posted to DHQH Karak before on administrative grounds and was busy in escaping from karak by all means as he registered one criminal case against his subordinate/others in Police station Karak-FIR-on record**) that green eyed respondent 03 after his promotion to BS-19 has submitted his arrival/charge report on 01.02.2024 (FN) on eve of his transfer(without completing the one year probation)from DHQ Hospital Lakki Marwat to DHQ Hospital Karak against the vacant post of principal medical officer(BS-19) for the unauthorized drawl of monthly pays vide the then Medical superintendent DHQ, Karak (Dr. Mohammad Saleem) office covering letter No:156/Admin/DHQH/KK dated 01.02.2023 addressed to DGHS KPK under intimation to P.S of respondent 02 only

(The attested copy of the unauthorized covering letter regarding submitting of unauthorized Arrival/charge reports of respondent 03 by letter of 01.02.2023 addressed to DGHS KPK Peshawar is annexed in Annexure E)

- G. That on 16.11.2023, Dr Mohammad Saleem (BS-19) the MS/DHQ Hospital Karak was transferred to the office (Director DHIS) at the office of DGHS, Warsak road Peshawar, KPK and consequent upon the above green eyed respondent 03 [furnished in the instant order as "Senior District Specialist (Anaesthesia) Principal medical officer(BS-19) DHQ

Hospital Karak ] is hereby assigned additional charge of the post of the medical superintendent DHQ Hospital Karak in addition to his own duties till further orders.

(The attested copy of the impugned notification of dated 16.11.2023 is annexed in Annexure F)

- H. That the civil services of respondent 03 belongs to the District specialist cadre in Anaesthesiology, was on probation period after promotion at DHQH Lakki Marwat, has not submitted his concerned specialist cadre service profile by on line prescribed application in time to respondent 02, is not the holder of any post graduate qualification in public health (mandatory for hospital management) and therefore respondent 03 is not even entitled to serve as medical superintendent of DHQ Hospital Karak but his specialized civil services to be kept bound to the operation theatre environment in DHQ Hospital Lakki Marwat in the favour of public interest, accordingly.
- I. That respondent 02 though impugned notification(annexed in Annexure F, above) has made the appellant as subordinate to his junior, ineligible, specialist cadre, irrelevant and unauthorized officer (brought by fictitious way) is against the virtue and principles of cadres/seniority/eligibility/criteria/rules&regulations of government machinery of regular civil services, accordingly. That feeling aggrieved by the impugned notification, the appellant submitted proper written departmental appeal to respondent 01 of dated 04<sup>th</sup> Jan 2024 which has not been responded by respondents 01 & 02 until this date. (The attested copy of the departmental service appeal of 04.01.2024 is annexed in Annexure G). (The attested copy of acknowledgment receipt of delivery on 05.01.2024 annexed in Annexure H).
- J. That there after the appellant submitted proper written SOFT REMINDER of dated 16.02.2024 to respondent 01 under intimation to DGHS KPK Peshawar in the matter concerned but no concerned response has been communicated to the appellant until this date.(The attested copy of the soft Reminder of dated 16.02.2024 is annexed in Annexure J). (The attested copy of acknowledgment receipt of delivery on 05.01.2024 annexed in Annexure K).
- K. That now the appellant has been disappointed from the respondents 01 and 02 and approach this Honourable service tribunal on the following legal and valid grounds:

### GROUNDS

- 1). That the impugned notification of dated 16.11.2023 (Annexure F, above) is clear violation of seniority, eligibility, against the rules and regulations of civil services. *The impugned notification is precedent OR token of Choose and Pick and own and like.*
- 2). That the appellant being senior, eligible, recommended by DGHS KPK, qualified, experienced in hospital management, trained manager and holder of post graduate qualification in public health has unfairly been ignored and deprived unlawfully to serve legally/as per meritocracy as medical superintendent of DHQ Hospital Karak.
- 3). That the appellant has been made subordinate to ineligible green eyed colleague posted fictitiously from DHQ Hospital Lakki Marwat without completing the probation period after his promotion in specialty of anaesthesia(BS-19) at DHQ Hospital Lakki Marwat which is against the principles of posting/transfer and good governance.
- 4). That the impugned notification of dated 16.11.2023 (Annexure F, above) reflects the ignorance and malafide of the respondents 01 & 02.
- 5). That the impugned notification of dated 16.11.2023 (Annexure F, above) is the symbol and Precedent of nepotism, favouritism, lacks spirit of good governance and is clear instance of "Might is Right."

6). That according to rules of civil services (KPK), the additional charge / acting charge / current charge (if legal) can be hold for minimum one Month and maximum for three months only which is further extendable for another 03 Months (if legal) with the approval of the next higher authority and after 06 Months (if posted legally) there is no extension in additional charge, accordingly. But here in the instant case the green eyed respondent 03 is working (if legal) from more than 06 Months.

7). That due to non posting of regular and original incumbent of the medical superintendent the operation theatre environment for managing the surgical anaesthesia under the supervision of green eyed respondent 03 to the visiting vulnerable in door patients in DHQ Hospital Karak is in very pathetic condition as a result there is no provision of essential surgical anaesthesia to the needy vulnerable indoor patients.

**Any additional ground deems proper will be advanced during arguments.**

### **PRAYER**

Therefore, it is most humbly prayed that on acceptance of instant appeal, the impugned notification up to the extent of respondent 03 as assuming the unauthorized additional charge of medical superintendent DHQ Hospital Karak may graciously be declared false, incorrect, invalid, unauthorized, forged, fictitious, against the rules of civil services/ regulations/ principles/ policies of posting availing probation period of promotion along with holding of FOUR charges at the same occasion of the public offices by the green eyed respondent 03 in civil services of Government of KPK Health department i.e. *Principal medical officer (PMO-DHQH, Karak), Senior District specialist Anaesthesia (DHQ Hospital Lakki Marwat), Senior District specialist Anaesthesia (DHQ Hospital Karak) and even the medical superintendent DHQ Hospital Karak.*

Moreover, it is further prayed that respondents 01 & 02 may kindly be ordered/directed to assign the legal charge of the medical superintendent DHQ Hospital Karak to the appellant in the present circumstances being senior most, eligible, qualified, trained in hospital management, experienced to respondent 03 (*specialist cadre, probation period after promotion to BS-19 at DHQH Lakki Marwat has not been terminated by appointing authority until this date*) and respondent 03 to be ordered to join his previous position at the DHQ Hospital Lakki Marwat to serve as a senior District specialist in Anaesthesia (BS-19) in order to complete his concerned period of probation after promotion to BS-19 at that station till the termination of probation period by his appointing authority, accordingly.

  
Dr. Aftab Ahmed

Thanking You

(Appellant in person)

Principal medical officer (BS-19), DHQ Hospital, karak

Mobile/WhatsApp #: 0346-8110578.....CNIC #: 17301-3532857-3

### **REFERENCES OF BOOKS:**

(1). Establishment Code for civil services. KPK. (2). Service tribunal ACT 1974. (3). Civil servant Act 1973. (4). The Manual of civil services Rules applicable to KPK Government Employees updated September 2013 compiled by Amir Badshah (2013)

Before the Honourable Service tribunal Khyber Pakhtunkhwa, Peshawar.

Amended service appeal No: \_\_\_\_\_/2024

Dr. Aftab Ahmed

s/o Prof; dr. Mohammad ali khattak (late)

Principal medical officer (BS-19), DHQ Hospital, Karak.

R/O H#17, street # 2, Sector E-2, Phase I, Hayatabad, Peshawar

..... Appellant

**Versus**

1. The Chief Secretary to the government of Khyber pakhtunkhwa, Peshawar.
2. The Secretary to the Government of Khyber pakhtunkhwa, Health department, Peshawar.
3. Dr. Abdul wahab, medical superintendent, DHQ Hospital, Karak ..... Respondents.

**AFFIDAVIT**

I, Dr. Aftab Ahmed son of Prof: Dr. Mohammad Ali Khattak (late) presently serving as a principal medical officer (BS-19) in District Head Quarter hospital Karak, solemnly affirm and declare that the contents of the accompanying amended service appeal are correct to the best of my knowledge and belief and nothing has been concealed from this Honourable service tribunal, Khyber Pakhtunkhwa, Peshawar.

(Appellant)

(In - person)

dated: 21.05.2024

Verified by Oath Commissioner

Muhammad Hashim  
Advocate

Oath Commissioner  
District Courts Karak

S.No.201/Date..21-05-2024

Dr. Aftab Ahmed (Malek)  
Principal medical officer  
D.H.Q. Hospital Karak.

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**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR**

All communications Should be Addressed to The Director General Health Services  
Peshawar and not to any official by name

Office Ph # 091 - 9210269 Exchange # 091 - 9210187, Fax # 091 - 9210230

No. 4689 /E-I

Dated: 29/03/2022

**SERVICE EXPERIENCE CERTIFICATE**

It is certified that Dr. Aftab Ahmad S/O. Mohammad Ali has joined the Provincial Health Department as Medical Officer (BPS-17) on 12/12/1998 on regular basis. Presently he is attached to DHQ Hospital, Karak as PMO (BPS-19).

His history of service is as under:

S.#	Appointment held	From	To
1.	MO BPS-17, BHU Bio Bandi Mansehra	12/12/1998	17/02/2003
2.	Trainee Medical Officer PGMI Peshawar	18/02/2003	31/12/2003
3.	MO DHQ Hospital Karak	01/01/2004	30/06/2004
4.	Availed EOL without pay for 04-years ordered by the service tribunal KP on 30/04/2008	01/07/2004	30/04/2008
5.	MO DHQ Hospital, Karak	01/05/2008	30/04/2015
6.	Coordinator National LHWs Program Karak	01/05/2015	31/03/2016
7.	MO Type-C Hospital Takht-e- Nasrati, Karak	01/04/2016	30/09/2016
8.	MO Type-D Hospital Panyala D.I.Khan	01/10/2016	28/09/2017
9.	SMO BPS-18 Type-D Hospital Panyala D.I.Khan	29/09/2017	22/10/2021
10.	PMO BPS-19 DHQ Hospital Karak	23/10/2021	Till date

*[Signature]*  
29/3/22  
DIRECTOR (HRM)  
DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR.

*[Signature]*  
29/03/2022

*[Signature]*  
*[Signature]*  
Dr. Aftab Ahmed (Malak)  
Principal medical officer  
DHQ Hospital Karak



Registration No. SUIT-07-02-86003

Serial No. 102061



# Sarhad University of Science & Information Technology

This is to certify that Aftab Ahmed ~~son~~ daughter of Mohammad Ali

having passed the requisite examination, is hereby awarded the

**Diploma in Public Health**

Given at Peshawar (PAKISTAN) on the Tenth Day of April Two Thousand Ten.

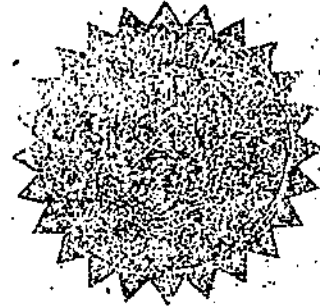
*Aftab Ahmed*  
*Aftab*

Dr. Aftab Ahmed (Nisalak)  
Principal medical officer  
S.H.M. Peshawar

*Dr. Saad*  
Dean

*[Signature]*

Registrar



*[Signature]*  
Vice Chancellor



**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services  
Peshawar and not to any official by name E-Mail Address [K.P.Kdghs@yahoo.com](mailto:K.P.Kdghs@yahoo.com)  
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 091-9210230

NO. 1240-41 /E-I

Dated: 25/01/2023

To

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

Subject:- POSTING OF DR. AFTAB AHMAD AGAINST VACANT POST AT KARAK.

Enclosed please find herewith a copy of application in respect of Dr. Aftab Ahmad PMO (BPS-19) attached to DHQ Hospital Karak requesting for posting against the vacant post of DDHO Karak, M.S, Type "C" Hospital Karak City and M.S DHQ Hospital Karak, for further necessary action.

It is stated that the doctor concerned is serving in the Provincial Health Department since 12.12.1998 on regular basis and presently working in DHQ Hospital Karak since 23.10.2021.

It is therefore requested that necessary orders of the Govt. may please be conveyed in the matter.

**Add: Director General HRM**  
Directorate General Health Services  
Khyber Pakhtunkhwa Peshawar

CC:

M.S DHQ Hospital Karak for information with the remarks to direct the doctor concerned to apply online for the said posting/transfer on Health Department website:

*forwarded to secretary health for N/A and online has been done. On record*  
*Sobhan*  
*MS/DHQA Karak*  
*25/01/2023*  
*Aftab*  
*J.P.S.*

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**Dr. Aftab Ahmed (Karak)**  
Principal medical officer  
D.H.Q. Hospital Karak.

Government of Khyber Pakhtunkhwa

Annexure

Health Department

e-applications system



Subject: Transfer | Humanitarian Ground

APPLICANT DETAILS

Aftab Ahmed S/D/W of Muhammad Ali

Personnel No: 653978

CNIC: 1730135328573

Gender: Male

Domicil District: KARAK

Reference No: HRD-146762

Current Duty District	KARAK	Current Duty Station	DHQ Hospital Karak
Current Post Joining Date	21-10-2021	Service Joining Date	12-12-1998
Designation	PRINCIPAL MEDICAL OFFICER	BPS	19
Cadre	General Cadre	Service Type	Civil Servant
District Priority One	KARAK	District Priority One   Two   Three	KARAK   KARAK   KARAK
Apply Date	30-12-2022 14:34:13	Status	Submitted

Application Detail

requesting for transfer as DHO karak against the vacant post . i qualified post graduate qualification in Public health. more then 20 years exp in the field of primary health care and public health

Attachments

- CNIC Copy : Download ([http://onlineapplication.healthkp.gov.pk/assets/uploads/transfer\\_application/fe2f065ec368bc99886f59b96caf2a59.jpeg](http://onlineapplication.healthkp.gov.pk/assets/uploads/transfer_application/fe2f065ec368bc99886f59b96caf2a59.jpeg))

Attested

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Dr. Aftab Ahmed (Malak)  
Principal medical officer  
D.H.O. Hospital Karak



DEPUTY MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL KARAK

No. 154 / Admin / DHQH / KK

Dated: 01 / 02 / 2023

To

The Director General Health Services,  
Khyber Pakhtunkhwa Peshawar

Subject:

ARRIVAL / CHARGE REPORT IN R/O DR: ABDUL WAHAB SENIOR  
DISTRICT SPECIALIST ANESTHESIA BPS-19

Kindly refer to Govt. of Khyber Pakhtunkhwa Health Deptt. Notification No: SOH-  
LHD/3-5/2022 dated: 03-03-2021.

It is stated that Dr. Abdul Wahab Senior District Specialist Anesthesia BPS-19 has  
submitted arrival report on 01-02-2023 (F.N) on eve of his transfer from DHQ Hospital Lakki  
Marwat to DHQ Hospital Karak, against the vacant post of Principal Medical Officer BPS-19 for  
drawal of pay.

This charge report in duplicate is hereby submitted for record and further  
necessary action please.

*Saleem* 01/02/2023  
Medical Superintendent  
DHQ Hospital Karak

Even No & date:

Copy forwarded to:

1. P.S to Secretary Health Govt of Khyber Pakhtunkhwa Peshawar for information please.
2. Deputy Medical Superintendent Admin DHQ Hospital Karak for information.
3. The District Account Officer Karak for information and necessary action.
4. Local Account Clerk for information and necessary action.
5. Focal Person Bio-Metric System DHQ Hospital Karak for information.
6. Doctor Concerned for information.

*Saleem* 01/02/2023  
Medical Superintendent  
DHQ Hospital Karak

*Aftab Ahmed*

*Aftab Ahmed*

Dr. Aftab Ahmed (Malek)  
Principal medical officer  
D.H.Q. Hospital Karak



GOVT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT



Dated: Peshawar the 16<sup>th</sup> November 2023

**NOTIFICATION**

**NO.SOH (E-V)/2-2/2023 DR. MUHAMMAD SALEEM (1730140552971) S/D/W of INAYAT UR REHMAN (BPS-19)**, Medical Superintendent, DHQ Hospital Karak is hereby transferred and posted as Director (DHIS) BS-19 at Directorate General Health Services, Khyber Pakhtunkhwa against the vacant post, with immediate effect, in the best public interest.

Consequent upon the above, **DR. ABDUL WAHAB (1420320519509) S/D/W of GHAZI KHAN (BPS-19)**, Senior District Specialist (Anesthesia)/ Principal Medical Officer (BS-19), DHQ Hospital Karak is hereby assigned additional charge of the post of Medical Superintendent, DHQ Hospital, Karak in addition to his own duties till further orders.

SECRETARY HEALTH  
KHYBER PAKHTUNKHWA

No. 2587-98 /Notification of even No. & dated:  
Copy of the above is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Director, HRMIS, DGHS Office, Peshawar.
4. District Health Officer, concerned.
5. Medical Superintendent, concerned.
6. District Account Officer, concerned.
7. Deputy Director (IT), Health Department, Khyber Pakhtunkhwa.
8. PS to Secretary Health Department, Khyber Pakhtunkhwa.
9. PS to Special Secretary (E&A) Health Department, Khyber Pakhtunkhwa.
10. Doctors concerned.
11. Master file.

(FAZAL AMIN)  
SECTION OFFICER (E-V)

Dr. Aftab Ahmed Malik  
Principal medical officer  
D.H.Q. Hospital Karak.

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371001043626

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To

(By Leopards Courier)

The Chief Secretary to the Government of Khyber Pakhtunkhwa

Peshawar.

Reference: *Invalid additional charge of the MS, DHQH Karak handed over to (Dr. Abdul Wahab) the incharge of Anaesthesia (specialist cadre BS 18) serving in the said DHQH Karak by violating the meritocracy in the matter since 17.11.2023*


Subject: Handing over of the additional charge of medical superintendent DHQ Hospital Karak to Dr. Aftab Ahmed (malak) PMO BS-19 (General Cadre) against the vacant post of Medical superintendent at District Headquarter hospital, Karak.

**Memo:**

The undersigned intimates your good self in time:

- 1) That the undersigned is serving as a **principal medical officer** (General Cadre BS 19) in DHQH Karak since 23.10.2021, is the holder of Post graduate qualification in the field of Public health duly recognized by HEC, Pakistan and having 24 years valid experience in managing Public health. .....(Copies enclosed in Annexure A & B respectively).
- 2) That being eligible, experienced and also having the managerial qualities, the one written application of the undersigned of 19.12.2023 forwarded by the MS DHQH Karak was duly recommended by Director General Health Services those days and intimated the Secretary to Government of KPK, Health department (vide DIARY NO: 4579 dated 26.12.2022) to arrange the office Order to enable Dr. Aftab Ahmed (PMO) to serve as a Medical Superintendent of DHQ Hospital Karak or as District Health Officer Karak under intimation to MS DHQH Karak with the remarks to direct Dr. Aftab Ahmed (PMO) to submit On-line application vide No: 1240 - 41 /E-I dated 25.01.2023. ....(Copy enclosed in Annexure C)
- 3) That in the response, the undersigned submitted proper **On-line application on dated 30.12.2022** to the Secretary Health, KPK Peshawar.....(Copy enclosed in Annexure D).
- 4) That on dated 16<sup>th</sup> November the MS DHQH Karak (Dr. Saleem) was posted to Health Directorate Peshawar against the vacant post of Director (DHIS) and consequent upon the above, the one politically oriented green eyed namely Dr. Abdul Wahab (BS 19 without completing the one year probation of his promotion) the only Anesthesia Specialist (specialist cadre) of DHQH Karak was handed over the additional charge of the medical superintendent DHQH Karak by violating the meritocracy, law & Rules of Civil services vide Notification No: SOH(E-V)2-2/2023 dated 16.11.2023.....(Copy enclosed in Annexure E).
- 5) That recently the secretary health has transferred Dr. Muhammad Saleem Ex. MS DHQH Karak to health directorate and has handed over the additional charge of MS DHQH Karak to the only green eyed senior anesthetist serving in DHQH Karak under violation of meritocracy. .... (Copy enclosed in Annexure F).

**REQUEST:** Therefore, Facts & Grounds captioned above, the undersigned is the suitable, eligible & experienced candidate to serve as a Medical Superintendent of DHQ Hospital Karak in an expertise way in the favour of public interest, accordingly. It is humbly requested to approve the undersigned name to serve in the matter captioned above, please.

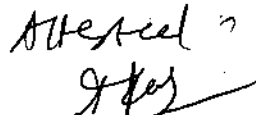
 Thanking You  
4/1/24  
Dr. Aftab Ahmed (malak)

Principal medical officer (PMO—BS-19).

Dated: 04.01.2024

DHQ Hospital Karak... Mobile # 0346-8110578

Page 12

  
Dr. Aftab Ahmed (malak)  
Principal medical officer  
D.H.Q. Hospital Karak.

(Immediate Out Today)

(SOFT REMINDER). (Registered OPSS)

To

The Chief Secretary to the Government of Khyber Pakhtunkhwa, Peshawar.

*Reference: Invalid additional charge of the MS, DHQH Karak handed over to Dr. Abdul Wahab, the incharge of Anaesthesia (specialist cadre) serving in the said DHQH Karak by violating the meritocracy in the matter since 17.11.2023*

**Subject: Handing over of the additional charge of medical superintendent DHQ Hospital Karak to Dr. Aftab Ahmed PMO BS-19 (General Cadre) against the vacant post of Medical superintendent at District Headquarter hospital, Karak.**

**Memo:**

The undersigned has the honour to remind your good self in time:

- 1) That the undersigned forwarded an application of dated **04.01.2024** to your good self for the posting of the undersigned against the vacant post of a medical superintendent of the DHQ Hospital Karak. (Copy enclosed in **Annexure A**).
- 2) That the one namely Dr. Abdul wahab (Anaesthesia specialist of DHQH Karak) who has been given the additional charge of Medical superintendent of DHQH karak by violating the meritocracy is availing the Ex. Pakistan leave from first week of February 2024 and has not handed over the charge of the MS. DHQH Karak to any doctor/ official to serve as a Medical superintendent of DHQH karak in his absence / leave. **The hospital is running without the controlling officer** which is not understandable. His concerned leave will expire in mid of March 2024, accordingly. (on record)
- 3) That the undersigned is the senior most, experienced and holder of post graduate qualification in Public health MPH/DPH. Therefore, the undersigned is the most eligible applicant to fill the vacant position of Medical superintendent DHQ Hospital Karak in order to run this hospital in a better way in the favour of public interest.

**REQUEST: That reference further facts and grounds captioned above, it is humbly requested to approve the undersigned name to serve as a Medical superintendent DHQ Hospital Karak and the existing additional charge holder to be deputed back to his only Anaesthesia post to serve better the needy surgical patients in DHQH Karak in the favour of public interest, accordingly, please.**

Thanking You

Dr. Aftab Ahmed (malak)

Principal medical officer (PMO—BS-19).

Dated: 16.02.2024

Copy to:

The Director general Health Services, KPK, Peshawar with the request to put up the case along with the valid recommendations to the Secretary to the Government of KPK, health department for the approval in the matter, otherwise the case will be instituted against the matter before the honourable chairman of Service tribunal KPK, Bannu Bench, Bannu, accordingly, please.

Dr. Aftab Ahmed (malak)

Dated: 16.02.2024

DHQ Hospital, Karak, PMO—BS-19). ... Mobile # 0346-8110578

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Altered  
Dr. Aftab Ahmed (malak)  
Principal medical officer  
D.H.Q. hospital Karak.

Consignment No. ARS58357AS

Shipment picked  Dispatched  Arrived  Out for Delivery  Pending

Delivered

(RABANI - SELF) Dated: 05 January 2024, 15:22

Origin : KARAK  
 Shipper : DR AFTAB AHMAD  
 Reference No. :  
 Pieces :  
 Destination : PESHAWAR  
 Consignee : THE CELEF SECR  
 Booking Date : 04 January 2024  
 Weight : 250 Kg(s)

Shipment Information

Delivered to (RABANI - SELF)

05 January, 2024 (15:22)

Attended

Dr. Aftab Ahmed Orakzai  
Principal medical officer  
2, H.Q. Hospital Karak.

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of sender

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Attested - [Signature]

Dr. Afrah Ahmed (M.B.B.S.) Principal medical officer J.H.U. Mesourah Karar.