


Form-A

FORM OF ORDERSHEET

Court of _____

Case No. 770/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	10.06.2024	<p>As per direction of the Hon'ble Member Judicial the present appeal is fixed for preliminary hearing before Single Bench at Peshawar on 11.06.2024. Parcha Peshi given to counsel for the appellant.</p> <p style="text-align: right;"> REGISTRAR</p>

Respected Madam,

It is submitted that the present appeal was returned to counsel for the appellant for removing the deficiencies (Flag-A). Today i.e. 04.06/2024 the learned counsel re-filed the appeal without removing the objection no.3 with detail reply (Flag-B).

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.


REGISTRAR

Hon'ble Member (J).

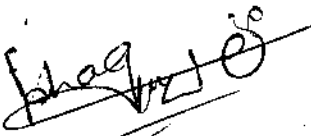
Be fix before the court. R
for tomorrow. 10/6/24.

The appeal of Mr. Anas Iqbal received today i.e on 03.06.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no.1&3 are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Address of the appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Copy of proper rejection order of departmental appeal mentioned in the memo of appeal is not attached with the appeal be placed on it.
- 4- Copy of departmental appeal is incomplete be completed.

No. 110 /Inst;/2024/KPST;

Dt. 4/06 /2024.



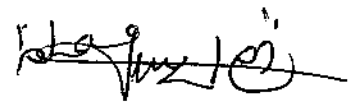
Muhammad Ishaq Adv.
High Court Peshawar.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

In response: to:

Para No3: No proper order in respect of the dismissed has been made. rather the departmental was regretted only.

Objections raised in para No: 1, 2 and 4 have been removed.


04/06/24

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

In. S.A No.

Anas iqbal

.....Appellant

Versus

Secretary Relief Department KP Others

.....Respondents

**APPLICATION FOR FIXATION OF THE ABOVE
TITLED CASE BEFORE THE PRINCIPLE SEAT
PESHAWAR.**

Respectfully Sheweth;

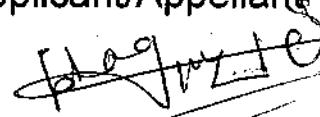
1. That the above titled case is pending before this Hon'ble Tribunal in which no date of hearing is fixed yet.
2. That the office of the respondents is located in Peshawar and the case is of urgent notice, if delayed would cause irreparable loss to the applicant/appellant.
3. That the applicant/appellant requests this Hon'ble Tribunal for fixation of the above titled case before the Principle Seat in Peshawar.
4. That there exists no legal bar on acceptance of the instant application rather it is for the best interest of justice.

It is, therefore, most humbly prayed that on acceptance of the instant application, the above titled case may kindly be fixed before the principle seat in Peshawar.

Dated: 03/06/2024

Through

Applicant/Appellant


Muhammad Ishaq Khan
Advocate, High Court
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. 770 / 2024.

Anas Iqbal S/O Muhammad Iqbal (Emergency Medical Technic BPS-12, Emergency Rescue Service (1122) Khyber Pakhtunkhwa at D.I.Khan) under transfer to Upper Chitral from D.I.Khan ...**Appellant.**

V E R S U S

Secretary Relief Department Khyber and others.....**Respondents**

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal with affidavit		1-6
2.	Application for suspension with affidavit		07-09
3.	Addresses of parties		10
4.	Copy of Advertisement, Appointment Letter, Look After Charge Notification	A, A-1 & A-2	11-13
5.	Copy of order /notification dt.25.04.2024	B	14
6.	Copy of the Office Order dt.16.05.2024	C	15
7.	Copy of the Departmental Appeal	D	16-16A
8.	Copy of Monthly Salary statement	E	17
9.	Copy of Medical Reports of Appellant's Father	F	18-20
10.	Wakalatnama		21

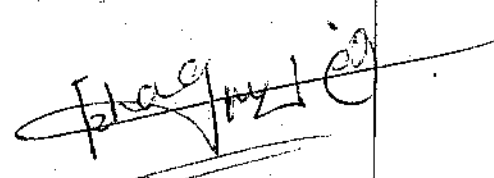
Dated; 01/06/2024.

A P P E L L A N T

Anas Iqbal

THROUGH:


(Muhammad Bilal Hassan)
Advocate High Court,
PESHAWAR


(Muhammad Ishaq Khan)
Advocate High Court,
PESHAWAR

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. 770 / 2024.

Anas Iqbal S/O Muhammad Iqbal (Emergency Medical Technician BPS-12, Emergency Rescue Service (1122) Khyber Pakhtunkhwa at D.I.Khan) under transfer to Upper Chitral from D.I.Khan

.....Appellant.

V E R S U S

1. Secretary Relief Department Khyber Pakhtunkhwa, Civil Secretariat, Peshawar
2. Director General Emergency Rescue Service (Rescue 1122), Khyber Pakhtunkhwa

.....Respondents.

Appeal U/S 4 of the KP Services Tribunal Act, 1974, for setting aside the Notification/Order No: 1-20/Transfer/DA-1122:-2615-22, Dated: 25.04.2024 issued by the Respondent No: 2 Director General Emergency Rescue Service (Rescue 1122), Khyber Pakhtunkhwa, whereby the Departmental appeal of the Appellant's request was regretted by Respondent No: 2 on Dated: 29.05.2024.

PRAYER:

On acceptance of this appeal the Notification/Order No: 1-20/Transfer/DA-1122:-2615-22, Dated: 25.04.2024 of Respondent No: 2 may kindly be declared null and void by restoring the Appellant to its original position.

and the dismissal of the Departmental Appeal Dated: 29.05.2024 by the Respondent No: 2 may kindly be set aside. Moreover the salary of the appellant may also be released for the best interest of justice.

Any other remedy which this August Tribunal deems proper may also be awarded to the appellant.

Respectfully Sheweth:-

1. That the above named appellant was initially appointed on Contract basis on 17/03/2017 as Emergency Medical Technic BPS-12 in the Emergency Rescue Service (Rescue 1122), Khyber Pakhtunkhwa who was regularized after an year of his service and later on the appellant was assigned the look after charge of SHI/MTO, District DI Khan till date. **(Copy of Advertisement, Appointment Letter, Look After Charge Notification are Annexed as "A", "A-1" and "A-2")**
2. That Respondent No: 2 vide Order/Notification No: 1-20/Transfer/DA-1122:-2615-22 Dated: 25.04.2024, the appellant has been transferred to Upper Chitral from DI Khan but the same was never intimated to the Appellant. **(Copy of order is attached as Annexure "B")**.
3. That upon receiving the Letter No:1-1/Office Order/DG-1122/Estt: 3133-37 Dated: 16.05.2024, it was transpired to the petitioner that he has been transferred to Upper Chitral

and a fact finding inquiry has been initiated by Respondent No:3 against the petitioner and his salary has been stopped. **(Copy of the Office Order is Annexed as "C")**.

4. That being aggrieved from the Impugned Order/Notification No: 1-20/Transfer/DA-1122:-2615-22 Dated: 25.04.2024 of Respondent No: 2, the appellant filed departmental appeal to the Director General for declaring the said transfer/posting null and void but the same was dismissed on Dated: 29.05.2024. **(Copy of the Departmental Appeal is Annexed as "D")**.
5. That being aggrieved from the Order/Notification No: 1-20/Transfer/DA-1122:-2615-22 Dated: 25.04.2024 of Respondent No: 2 and then dismissal of the departmental appeal of the appellant on 29.05.2024 by Respondent No: 2, the appellant now approaches this Honorable Court for cancellation/setting aside of the above said impugned Orders/Notifications and dismissal of the Departmental Appeal of the appellant on the following grounds inter-alias:

GROUND S:

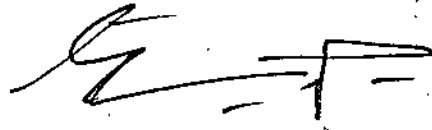
- A. That the impugned orders of the Respondent No: 2, is against law, facts and spirit of the rules laid down for the purpose of the posting and transfers of the civil servants, hence not maintainable.
- B. That the appellant has served his service period in his hometown of the province and remain posted in DI Khan from 02.03.2018 till date and on this score alone the impugned transfer order and dismissal of departmental appeal is not sustainable.

- C. That the appellant was never intimated in respect of his transfer Order/Notification by the Respondent No: 2 and as such the appellant has been the only person whose transfer has been notified with ulterior motives on administrative grounds and not in public interest and as such the appellant kept on serving in DI Khan till 27.05.2024
- D. That the appellant is serving in BPS- 12 with a Basic pay of Rs 29,780/- and it is impossible for the appellant to afford the expenditures of the travelling and other expenses at such a low pay as the appellant is the sole bread earner of the family. **(Copy of Monthly Salary statement is Annexed as "E")**
- E. That the father of the appellant is a heart patient and a senior citizen of the state and needs to be looked after and taken care of regularly and if the appellant is transferred to Upper Chitral, it would cause him a great loss. **(Copy of Medical Reports of Appellant's Father are Annexed as "F")**.
- F. That the impugned posting/transfer order/notification is stereo-type in nature and it did not disclose any cogent, valid and logical reason for the posting/transfer of the appellant.
- G. That the impugned order/notification does not fall in the general orders rather have been issued for a specific purpose, hence these orders are against the public interest.
- H. That the prima facie of the impugned order/notification suggests that the same is the result of political influence and based on mala fide intentions and without the application of mind of the Respondent No: 2, hence the order/notification is not sustainable in the eyes of law.

- I. That the appellant has been condemned unheard and the golden principle of natural justice has been violated while issuing the impugned orders and on this count alone the impugned orders are liable to be cancel.
- J. That on permission of this Honorable Court the appellant may urged the other grounds if any, at the time of arguments.

It is, therefore, most humbly prayed that on, acceptance of this appeal, the Order/Notification No: 1-20/Transfer/DA-1122:-2615-22 Dated: 25.04.2024 of Respondent No: 02 and the Dismissal of the Departmental Appeal Dated: 29.05.2024 by Respondent No: 02 may kindly be set aside/cancelled and the appellant may graciously be allowed to work on existing post in DI Khan. Moreover, the Inquiry initiated against the Appellant may kindly be declared illegal and ineffective upon the rights of the appellant.

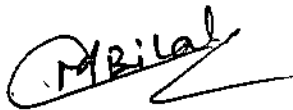
Dated; 01/05/2024.



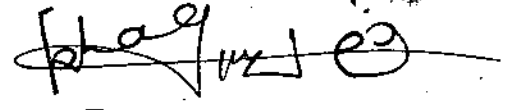
A P P E L L A N T

Anas Iqbal

THROUGH:



(Muhammad Bilal Hassan)
Advocate High Court,
PESHAWAR



(Muhammad Ishaq Khan)
Advocate High Court,
PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. _____ / 2024.

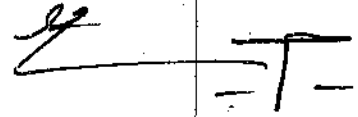
Anas Iqbal S/O Muhammad Iqbal R/O DI Khan under transfer to
 Upper Chitral From DI Khan.....**Appellant.**

VERSUS

Secretary Relief Department Khyber and others.....**Respondents**

AFFIDAVIT

I, Anas Iqbal S/O Muhammad Iqbal R/O DI Khan under transfer
 to Upper Chitral from D.I.Khan, do hereby solemnly affirm and states
 on oath that the contents of accompanying **appeal** are true and
 correct to the best of my knowledge and belief and nothing has been
 concealed from this Hon'ble Court.



Deponent.

Dated: 01 /06/2024

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

C.M No. _____ /2024
in
Service Appeal No. _____ / 2024.

Anas Iqbal S/O Muhammad Iqbal R/O DI Khan under transfer to
Upper Chitral From DI Khan.....**Appellant.**

V E R S U S

The Government of Khyber Pakhtunkhwa through Chief Secretary,
Peshawar and others.....**Respondents**

APPLICATION FOR SUSPENSION OF
OPERATION OF THE IMPUGNED ORDER/
NOTIFICATION NO:1-20/TRANSFER/DA-1122:-
2615, DATED 25.04.2024 TILL THE FINAL
DISPOSAL OF THE ABOVE MENTIONED
APPEAL.

RESPECTFULLY SHEWETH:

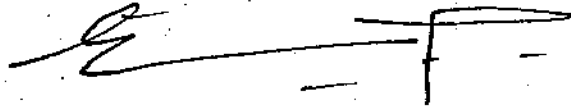
- 1- That the above mentioned appeal along with this application has been filed before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned order/notification dated: 25-04-2024 wherein the appellant has been transferred from DI Khan to Upper Chitral.
- 3- That if the impugned order dated 25-04-2024 has not been suspended, the appellant will face irreparable loss and will declare the above-mentioned appeal infructuous.

(S)

- 4- That all the three ingredients necessary for the stay are in favor of the appellant.
- 5- That the impugned Order Dated: 25-04-2024 had been issued by the Respondent No: 02 in utter disregard of law and prevailing Rules with mala fide intentions.

It is therefore, most humbly prayed that on acceptance of this application the operation of the impugned Dated: 25-04-2024 may very kindly be suspended till the disposal of the above mentioned service appeal.

Dated; 01/06/2024.



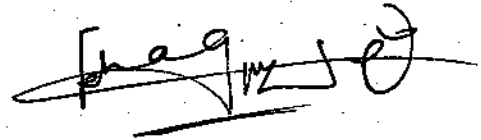
A P P E L L A N T

Anas Iqbal

THROUGH:



(Muhammad Bilal Hassan)
Advocate High Court,
PESHAWAR



(Muhammad Ishaq Khan)
Advocate High Court,
PESHAWAR

(9)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. _____ / 2024.

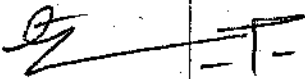
Anas Iqbal S/O Muhammad Iqbal R/O DI Khan under transfer to
Upper Chitral From DI Khan.....**Appellant.**

VERSUS

Secretary Relief Department Khyber and others.....**Respondents**

AFFIDAVIT

I, Anas Iqbal S/O Muhammad Iqbal R/O DI Khan under transfer
to Upper Chitral from DI Khan, do hereby solemnly affirm and states
on oath that the contents of accompanying **Application** are true and
correct to the best of my knowledge and belief and nothing has been
concealed from this Hon'ble Court.



Deponent.

Dated: 01/06/2024

(10)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. _____ / 2024.

Anas Iqbal S./O Muhammad Iqbal R/O DI Khan under transfer to
Upper Chitral From DI Khan.....Appellant.

V E R S U S

Secretary Relief Department Khyber and others..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Anas Iqbal S./O Muhammad Iqbal R/O DI Khan under transfer to
Upper Chitral From DI Khan.

RESPONDENTS

1. Secretary Relief Department Khyber Pakhtunkhwa, Civil
Secretariat, Peshawar
2. Director General Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa

Dated; 01/06/2024.

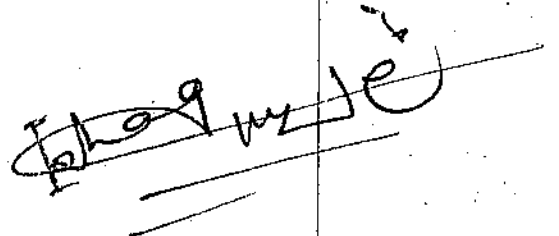
A P P E L L A N T

Anas Iqbal

THROUGH:



(Muhammad Bilal Hassan)
Advocate High Court,
PESHAWAR



(Muhammad Ishaq Khan)
Advocate High Court,
PESHAWAR

SITUATION VACANT

The Government of Khyber Pakhtunkhwa in its quest to extend Rescue-1122 Services to District Swat, Kohat and Chitral is looking for young, energetic and dedicated individuals willing to work anywhere in the province. Applications are invited from suitable candidates having domicile of Khyber Pakhtunkhwa/PATA for following project positions purely on Contract Basis. Females are encouraged to apply. The applications should reach P.O. Box No. 516, GPO Peshawar Cantt within one month of publication of this advertisement.

S.No	Nomenclature of Post	BPS	Prescribed Qualification	Age Limit
1.	District Emergency Officer	15	a) Preferably MBBS / B.Sc Engineering (Mechanical, Civil)/ MBA. b) 05 years working experience in Health Management / Emergency Department / Administration Department.	Age 20-40
2.	Emergency Officer	17	a) Preferably MBBS / B.Sc Engineering (Mechanical, Civil)/ MBA / Master in Public Health / Social Sciences. b) 02 years working experience in Health Management / Emergency Department / Administration Department.	Age 25-35
3.	Office Superintendent	16	Bachelor Degree from Recognized University. Five Year Experience.	Age 25-35
4.	Station Phone Incharge	16	B.Sc. OR B.A. with Diploma in Health Technology / Nursing. One year working experience in Emergency.	Age 25-35
5.	Control Room Incharge	16	Master Degree in Information Technology with certifications in LAN/WAN from recognized institution, preferably with specialization in Database. 03 years working experience in relevant/ recognized organization will be preferred.	Age 25-35
6.	Account Assistant	14	B.Com from Recognized Institution. One Year relevant experience.	Age 20-30
7.	Office Assistant	14	Bachelor Degree with 02 Years' experience.	Age 20-30
8.	Transport Maintenance Incharge	14	Diploma in Automobile Engineering from recognized institution. 02-05 Years relevant experience.	Age 25-35
9.	Audio Video Cameraman	14	B.Sc/BCE/BA 02 years experience in Non-linear editing or Animations or Computer.	Age 25-35
10.	Shift Incharge	12	B.Sc with Diploma in Associate Engineering OR Para Medical Diploma. Relevant experience will be preferred.	Age 20-30
11.	Wireless Technician	12	B.Sc OR Diploma in Electronics (preference will be given to DAE and ex-servicemen). 03-05 years' experience in maintaining wireless communication equipment.	Age 20-40
12.	Lead Fire Rescuers	12	Diploma in Associate Engineering (Mechanically). Preference will be given to one year relevant experience.	Age 20-40
13.	Computer Tele/Wireless Operator	12	B.Sc (Computer Science) or B.A with one year Diploma in Information Technology. Preference will be given to relevant experience.	Age 20-30
14.	Diving Supervisor	12	B.Sc/B.A. Supervisory experience of minimum 03 years. Preference will be given to deep water divers retired from Armed forces.	Age 25-40
15.	Emergency Medical Technicians	11	Paramedical Diploma / Nursing / LTV (Preference will be given to Diploma in Health Technology & Surgical Technology) Relevant experience will be preferred.	Age 20-30
16.	DRIFT Rescuers	11	Diploma in Associate Engineering (Civil/ Electronics/ Mechanical) OR B.Sc (Pre-Eng.) DAE will be preferred.	Age 20-30
17.	Fire Rescuers	11	Diploma in Associate Engineering OR B.Sc (Pre-Eng.) DAE will be preferred.	Age 20-30
18.	Electrical Technician	11	Diploma in Electrical Technology from Recognized Institution. Relevant experience will be preferred.	Age 20-30
19.	Diver	11	Secondary school certificate with experience of minimum 03 years. Preference will be given to water divers retired from Armed forces.	Age 20-40
20.	Senior Store keeper	7	Matrix OR Dispenser Diploma/ Diploma in Pharmacy. Two years relevant experience will be preferred.	Age 20-30
21.	Auto Technician	8	Diploma/ Certificate auto diesel, relevant experience will be preferred.	Age 20-30
22.	Security Incharge	07	Middle Pass, preference will be given to retired armed forces people.	Age 25-40
23.	Junior Clerk	07	Intermediate with min. typing speed of 30 words per minute. Preference will be given to computer literate persons.	Age 20-30
24.	Operator for Heavy Machinery	7	Matrix with LTV License. Five years relevant experience.	Age 20-30
25.	Helper Heavy Machinery	5	Middle pass, with LTV license, 2 years relevant experience.	Age 25-35
26.	Store Keeper	5	Matrix or dispenser diploma/ diploma in pharmacy. Two year relevant experience will be preferred.	Age 20-35
27.	Drivers LTV	4	03 Years LTV License. Middle pass education Preference will be given to matriculate with 03 years' experience.	Age 25-35
28.	Drivers HTV	4	02 Years HTV License. Middle pass education. Preference will be given to matriculate with 03 years' experience.	Age 25-35
29.	Office Attendants	2	Middle pass. Relevant experience will be preferred.	Age 20-40
30.	Security Guard	1	Middle pass with sound physique (preferably ex-servicemen).	Age 25-40
31.	Sweeper	1	Middle pass.	Age 20-40
32.	Gardner/ Mah	1	Preferably literate Diploma in relevant field	Age 25-35
33.	Plumber	1	Preferably literate Experience in relevant field	Age 25-35

TERMS AND CONDITIONS:

- No TA/DA will be admissible when called for physical written test and interview.
- Employees of Govt./Semi Govt./Autonomous Bodies/Corporations, will apply through proper channel.
- Incomplete and belated applications will not be entertained.
- Mandatory Physical test:
 - 01 mile running in 07 minutes for Male & height 5' 6" chest 33" minimum.
 - 01 mile running in 09 minutes for female height 5' 2" chest 30" minimum.
- The Selection committee has the right to appoint any suitable short listed candidate at any suitable post subject to requisite qualification and at any place.
- Candidates are required to bring along with them original computerized National Identity Card for all tests/interviews etc. Candidates are also required to bring with them original certificates/degrees and marks sheets for the interviews.
- Upon approval of the selection committee the candidate will go through Medical examination by civil Surgeon Police Hospital Peshawar.
- The medically fit candidates will be required to take mandatory training of 06 months or as prescribed and pass all the requisite examinations of Punjab Emergency Services Academy, Lahore.
- The selected candidates have to produce police clearance certificate before receiving offer of appointment.
- The selection of trainees will be based purely on merit.
- The selected trainees will have to sign security bond.

"SAY NO TO
CORRUPTION"

EMERGENCY RESCUE SERVICE (RESCUE-1122) KHYBER PAKHTUNKHWA

Also available on www.khyberpakhtunkhwa.gov.pk

BP/PS/24



DIRECTORATE GENERAL OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122)
GOVERNMENT OF KHYBER PAKHTUNKHWA
feedbackrescue1122@gmail.com www.rescue.kp.1122.gov.pk



12

No.1-1/DG-1122/Office Order/Estt/1180-1850

Dated: 17th March, 2017

OFFICE ORDER

On the recommendation of the Project Selection Committee, Mr. Anas Iqbal S/O Muhammad Iqbal having CNIC# 12101-5063380-1 is hereby conditionally enlisted as trainee for the post of Emergency Medical Technician (BPS-11) on contract, against project post initially for a period of one year (to be renewed on annual basis), subject to the following conditions:

- i. Clearance of medical examination to be held at Police Services Hospital Peshawar.
- ii. Police clearance certificate from local Police Station.
- iii. Verification of documents; which include CNIC, Domicile, Academic Qualification, Experience Certificates. In case of any discrepancy the appointment will stand cancelled and the salary paid during the period would be recovered.
- iv. Successful completion of the required basic Emergency Training at Punjab Emergency Services Academy, Lahore followed by Hospital Attachment. Your appointment shall be terminated in case you are not able to complete the training due to any reason. You will be appointed on probation for one year (inclusive of training period) to be conferred by competent authority.
- v. Employment to be whole time; Unless in any case it is otherwise provided, the whole time of an employee is at the disposal of the service and he may be employed in any manner required by the service without claim for additional remuneration.
- vi. Every member of the service shall be liable to serve anywhere within the province with the prior approval of the Director General Rescue 1122.
- vii. The competent authority reserves the right to dispense with your services without assigning any reason. Further, you will have no right to approach any Court of Law, against the decision of the competent authority.
- viii. Documentary proof to the effect that your employer had duly relieved you from your job/duty, if you are currently doing one in public or private sector. You are not allowed to do any part time job/ study during the service of Rescue 1122 Khyber Pakhtunkhwa.
- ix. Executing Contract Agreement on a stamp paper of Rs. 50/- duly attested by Oath Commissioner, affirming the terms and conditions of the enlistment.
- x. Execute an Undertaking on a stamp paper of Rs. 50/- duly attested by Oath Commissioner, affirming the terms and conditions mentioned therein.

Note: *The Arrival Report of the selected candidates would be accepted only after fulfilling the conditions mentioned in para "i" & "ii" above within 15 days of issuance of this order.*

-SD-
(DIRECTOR GENERAL)

Copy forwarded to:

- 1- Accountant General, Govt. of Khyber Pakhtunkhwa.
- 2- Medical Superintendent, Police Services Hospital Peshawar, *with the request to facilitate medical examination of the above mentioned appointee.*
- 3- PS to Secretary, RR&S Department, Govt. of Khyber Pakhtunkhwa.
- 4- PA to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa.
- 5- Concerned District Police Officer, *for facilitating in issuance of Police Clearance Certificate.*
- 6- Accountant HQ, ERS (Rescue-1122), Khyber Pakhtunkhwa.
- 7- Official concerned.
- 8- Personal file.

ASSISTANT DIRECTOR (ADMIN)
Emergency Rescue Service (Rescue-1122)
Khyber Pakhtunkhwa.

Annexure (A-2)



OFFICE OF THE DISTRICT EMERGENCY OFFICER
KPK Emergency Rescue Service (Rescue - 1122), D.I. KHAN
Government of Khyber Pakhtunkhwa
Rescue1122dikhan@gmail.com
0966-933438 0966-715166



13

F.No. 1-22 DEO DIK/

180-83

Date: 22-05-2022

NOTIFICATION:

On the direction of competent authority, Mr. Ans Iqbal (A/SHI) Emergency Rescue Service (Rescue-1122) District D.I.Khan is hereby assigned the look after charge of MTO District D.I.Khan, in addition to his own duties with immediate effect in the best public interest.

DISTRICT EMERGENCY OFFICER
KPK ERS (Rescue-1122),
Dera Ismail Khan

Copy to:

1. PA to DG, ERS (Rescue-1122), Khyber Pakhtunkhwa.
2. Official Concerned.
3. Office File

Annexure B

14



DIRECTORATE GENERAL
EMERGENCY RESCUE SERVICE (RESCUE - 1122)
GOVERNMENT OF KHYBER PAKHTUNKHWA
T: 091-9222568, F: krcs-cs@kpk.gov.pk, I: 091-9222487



NO. 1-20/Transfer/DA-1122-2024-22 Dated Peshawar 25th April, 2024

NOTIFICATION

Consequent upon the approval of the Competent Authority (Director General ERS Rescue-1122), the following Official of Khyber Pakhtunkhwa Emergency Rescue Service, (Rescue-1122), is hereby transferred/posted on administrative grounds as per details given below till further order.

S.NO.	NAME	FATHER NAME	Belt No.	DESIGNATION	FROM	TO
1.	Anas Iqbal	M. Iqbal	535	EMT	D I Khan	Upper Chitral

-SD-
DIRECTOR GENERAL
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa.

Copy to:-

1. Director Operation, Emergency Rescue Service (Rescue 1122), Khyber Pakhtunkhwa.
2. Concerned District Incharge, Emergency Rescue Service (Rescue 1122), Khyber Pakhtunkhwa.
3. Accountant, Emergency Rescue Service (Rescue 1122), HQ Khyber Pakhtunkhwa.
4. PMC Incharge, Emergency Rescue Service (Rescue 1122), Khyber Pakhtunkhwa.
5. P.A to DG, Emergency Rescue Service (Rescue 1122), Khyber Pakhtunkhwa
6. Personal file of the concerned.
7. Transfer Posting File.


25/4/24
DIRECTOR ADMINISTRATION
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa.

Annexure "C"

15



**DIRECTORATE GENERAL OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122)**

GOVERNMENT OF KHYBER PAKHTUNKHWA
feedback.rescue1122@gmail.com www.rescue1122.kpk.com



No.1-1/Office Order/DG-1122/Estt:

3133-37

Peshawar: 16.5.2024

OFFICE ORDER:

Consequent upon approval of the Competent Authority, Mr. Bashir Ullah DD (Operations) Khyber Pakhtunkhwa ERS (Rescue-1122), is hereby nominated for fact finding inquiry against Mr. Anas Iqbal S/O M. Iqbal (EMT) ERS (Rescue-1122) Upper Chitral. Following the allegation against him;

- i. The accused official was transfer to District Upper Chitral but he failed to report for his duty and remain absent w.e.f 27-04-2024 to till date without prior approval of the Competent Authority.
- ii. The accused official is ill disciplined and fail to follow official obligation.

Note: Inquiry report along relevant papers/ statements may be submitted within 04 days for perusal of the competent authority.

SD/-
(DIRECTOR GENERAL, ERS 1122)

Endstt: No.1-1/Office Order/DG-1122/Estt:

Copy forwarded to:-

- 1- Officer concerned for necessary compliance please.
- 2- District Emergency Officer, ERS (Rescue-1122) Upper Chitral.
- 3- Assistant Director (Actts), ERS (Rescue-1122), Khyber Pakhtunkhwa with the director to stop the salary of the above named official.
- 4- P.A to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa.
- 5- Office file.

DEPUTY DIRECTOR (ADMIN)

Handwritten signature and date: 16/05/24

Handwritten signature and date: 16/05/24

بخدمت جناب ڈائریکٹر جنرل ایمر جنسی ریسکیو سروس 1122 خیبر پختونخواہ

Mercy Petitione

(1) - اہل بر خلاف ڈائریکٹر جنرل ایمر جنسی ریسکیو سروس 25-04-2024 نمبر 1-20/Transfer/DA-1122-2615-72

(2) - رقم سروس No-1-1/office order/D6-1122/DH16-05-2024

جسکی رو سے من مسائل کو ضلع ڈیرہ اسماعیل خان سے ضلع ایمر جنرل ڈائریکٹر کر دیا گیا۔ اور من مسائل کی لائسنسی اور
ریکارڈ سے حث کر مسائل کے خلاف انکوائری شروع کرتے ہوئے من مسائل کو تھکاؤ بند کر دی گئی۔ جو کہ Natural
Justice کے اصول کے خلاف ہے۔

ERS (Rescue 1122) Peshawar
Diary No: 511
Date: 29/5/2024

جناب عالی! مسائل حسب ذیل عرض رہا ہے۔



۱- یہ کہ مسائل جناب کے ذریعہ ساریٹور EMT ضلع ڈیرہ اسماعیل خان میں تعینات ہے۔ اور بطریق احسن اپنی
خدمات سر انجام دے رہا ہے۔ مسائل کی خدمات کو پیش نظر رکھتے ہوئے مسائل کو خالی چارج SHI /MTO میں
دیا گیا ہے۔

۲- یہ کہ مسائل کی مذکورہ بالا خدمات اور بطریق احسن اپنی ذمہ داری سر انجام دینے کی وجہ سے جناب نے سروس
Certificate of Appreciation کو 11-04-2024 دیا گیا۔ لیکر سرٹیفکیٹ لے لیا ہے۔

۳- یہ کہ مسائل جناب والد کے ذریعہ یہ کم اپریل 2024 سے 16 مئی تک حاضر رہا ہے اور مسائل کی آن لائن
حاضری 16 مئی تک مکمل ہے مسائل کو ڈائریکٹر جنرل ایمر جنسی ریسکیو سروس کی نسبت لگائی گئی۔ اور نہ ہی مسائل کو اس نسبت
کوئی من موصول ہوا ہے۔ بدیں ہجرت ڈیڑھ نمبر 37-3133 میں درج غیر حاضری مسائل از سروس 27/4/2024
ریکارڈ سے حث کر اور خلاف واقعات و حقائق ہے۔ مسائل 16 مئی تک اپنے فرائض احسن طریقے سے سر انجام دے
رہا ہے۔

Request verified by...

۴- یہ کہ مسائل کے خلاف کوئی Complaint ہے اور نہ ہی کسی من مسائل نے اپنے افسران اہل کی شکایت
کی ہے۔ مسائل کا والد دل کے عارضہ میں مبتلا ہے اور مسائل ہی والد کی دیکھ بھال اور علاج دار داری کرتا ہے۔ مسائل کے
والد کی دیکھ بھال کرنے والے دوسرا کوئی نہ ہے۔ بدیں ہجرت ڈیڑھ نمبر 37-3133 میں درج غیر حاضری مسائل کو ضلع ڈیرہ اسماعیل
خان اپنی ذمہ داری سر انجام دینے کی اجازت دی جائے۔ نیز مسائل کے خلاف ریکارڈ سے حث کر کسی گئی انکوائری کو داخل

دفتر فرماتے ہوئے سائل کی تنخواہ جاری کی جاوے۔

ابذا استدعا ہے کہ بوجوہات بائلاسن سائل کی Mercy petition کو منظور فرمایا جاوے۔ تاکہ سائل اپنے
ذمیوں کی احسن طریقے سے سرانجام دے سکے۔

سورج 23-05-2024

اس اقبال ولد محمد اقبال (EMT) ریسک 1122 خیبر پختونخواہ ضلع ڈیرہ اسماعیل خان

23/5/24

[Handwritten signature]

Annexure "E"

17

Government of Khyber Pakhtunkhwa
District Accounts Office Nowshera
Monthly Salary Statement (January-2024)



Personal Information of Mr ANAS IQBAL d/w/s of MUHAMMAD IQBAL

Personnel Number: 00895408 CNIC: 1210150638801 NTN:
Date of Birth: 17.05.1989 Entry into Govt. Service: 02.03.2018 Length of Service: 05 Years 11 Months 000 Days

Employment Category: Active Temporary

Designation: EMERGENCY MEDICAL TECHNIC 80790261-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4310-Rescue 1122 Nowshera (Reg Act)

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

GPF Interest applied

GPF Balance:

186,988.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: EPS For - 2022

Pay Scale Type: Civil

BPS: 12

Pay Stage: 7

Wage type	Amount	Wage type	Amount
0001 Basic Pay	29,780.00	1001 House Rent Allowance 45%	2,940.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2315 Special Allowance 2021	3,500.00	2341 Dispr. Red All 15% 2022KP	2,718.00
2347 Adhoc Rel Al 15% 22(PS17)	2,718.00	2362 Risk Allow Rescue-1122	4,662.00
2378 Adhoc Relief All 2023 35%	9,922.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3012 GPF Subscription	-3,300.00	3501 Benevolent Fund	-1,200.00
3534 R. Ben & Death Comp Fresh	-600.00	3609 Income Tax	-265.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 3,000.03 Recovered till JAN-2024: 1,678.00 Exempted: 0.47- Recoverable: 1,322.50

Gross Pay (Rs.): 60,596.00 Deductions: (Rs.): -5,365.00 Net Pay: (Rs.): 55,231.00

Payee Name: ANAS IQBAL

Account Number: 0404-79018585-03

Bank Details: HABIB BANK LIMITED, 220404 University Campus, Peshawar, University Campus, Peshawar, PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: NOWSHERA

Temp. Address:

City:

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Email: anasiqbal11221122@gmail.com



WATIM GENERAL HOSPITAL

OUT PATIENT DEPARTMENT

Registration # _____

Time & Date: 10/2/23

Name Mr. Iqbal S/o D/o W/o _____

Age / Gender 73 / M Occupation _____

Address _____

Contact _____ Department Dr. SAJM SATTAR

VITALS

BP: _____

PULSE: _____

RES: _____

SPO₂: _____

IHD
CABG
Nov 2022

AFib & NVR
IHD / CABG

~~28/2/23~~

Dangdama

tab Lipiget plus

28/2/23

BSF, HbA1c
Fasting lipid profile

tab Ezidoz 25

tab Sustac 2-6

Tab
Concor
2.25mg
① tab
KDD 40mg

tab Mersyl 25mg

Con Zegop 25

tab Lipiget 10

2 tabs

AX Lestanol 3mg
1 tab

3. Masol 2mg

1M - 1 hour by

Fulu 2mg

in case

19



WATIM GENERAL HOSPITAL

OUT PATIENT DEPARTMENT

Registration # _____

Time & Date: 9/2/23

Name M. Iqbal S/o D/o W/o _____

Age / Gender _____ Occupation _____

Address _____

Contact _____ Department Dr. SAIM JAFRI

VITALS

SE: _____
R: _____
P: _____

Hx of CABG

3 mm eye

Cl/ SOB & Dehydration

ECG

BSP
Fatty Lipid profile

w/s 2

for Lowplate plus
E - 1.25
b. Alp 0.25
1-HA

to Rest 20

20

PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name
Anas Iqbal

Father Name
Muhammad Iqbal

Gender: M Country of Stay: Pakistan

Identity Number: 12101-5063880-1 Date of Birth: 17.05.1989

Date of Issue: 06.05.2021 Date of Expiry: 06.05.2031

Holder's Signature

12101-5063880-1

خان، مکی پانڈا خان، تحصیل و ضلع فری
اسرائیل خان

سٹیٹ ایڈمنسٹریٹو ڈیپارٹمنٹ، ایف بی سٹریٹ، ڈاک خانہ مکی پانڈا
خان، مکی پانڈا خان، تحصیل و ضلع فری
اسرائیل خان

101051301503

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

17301-9423952-9 38780	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈوکیٹ: محمد اسحاق خان (AHC)	PESHAWAR BAR ASSOCIATION
بار کونسل ایسوسی ایشن نمبر: BC-18-177	
رابطہ نمبر: 03467861117	

بعدالت جناب: سر مسٹر امین گل میٹا
Khaty.sheikh5566@gmail.com

مخانب: سائل	دعویٰ: Appeal w/s 4
Anas Iqbal	علت نمبر: -
بنام	مورخہ: -
Court of KP and others	جرم: -
	تھانہ: -

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام شمارہ کیلئے محمد اسحاق خان اینڈ گھریل اس کیس (AHC) مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر نکالنے و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساتھ ساتھ درخواست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائزہ مقدمہ کے سبب سے ہوگا کوئی تاریخی پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا ہند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 01/06/2024

Anas Iqbal s/o Muhammad Iqbal
No D.T. Ichen

مقام: واہ شد العبد

محمد اسحاق خان