


# FORM OF ORDER SHEET

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

**Appeal No.** 2470/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/11/2024	<p>The appeal of Mr. Umar Said presented today by Clerk of counsel for the appellant. It is fixed for preliminary hearing before touring Single Bench at Swat on 04.12.2024. Parcha Peshi given to clerk of counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR (CAMP COURT AT SWAT)**

Service Appeal No. 2470 of 2024

Umar Said ..... Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa and another

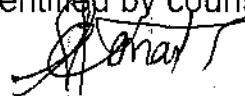
..... Respondents

**INDEX**

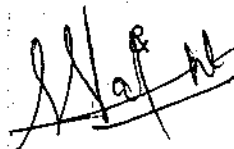
S. No.	Description	Annexure	Pages No.
1.	Memo of Service Appeal with Certificate		1-5
2.	Affidavit		6
3.	Addresses of parties		7
4.	Copy of Appointment Order	A	8
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9.	Copy of amended Levies Rules while reinstatement order	F	19-20
10.	Copy of retirement order	G	21
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Appellant

Umar Said  
Identified by counsels



Umar Sadiq Advocate High Court



Wajahat Ullah Advocate

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR (CAMP COURT AT SWAT)**

Service Appeal No. 2470 of 2024

Umar Said S/o Ahmad Said R/o Ouch Tehsil Adenzai,  
District Dir Lower [Sepoy Belt No.2113].

.....Appellant

**VERSUS**

- 1) Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs Department, Civil Secretariat at Peshawar.
- 2) Commandant Dir Levies/Deputy Commissioner Dir Lower at Timergara.

.....Respondents

**APPEAL UNDER SECTION 4 OF  
THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974.**

**PRAYER:**

On acceptance of this Appeal, Notifications No. SO(Police-II)HD/MKD/Levies/Misc./2020 dated 22-03-2021 & No. SO (Police-II)HD/1-3/Federal Levies 2021 dated 21-10-2021 and subsequent retirement order dated 01-07-2024 issued by respondent No.3 may be declared as illegal and the same be set aside. Consequently, the appellant may be reinstated and held entitled to complete his service till attaining 60 years age in light of Notification dated 14-07-2020.

Alternatively, the impugned notifications may be declared to be ineffective upon the rights of the

appellant and he may be allowed to complete his service till attaining 60 years of age.

Respectfully Sheweth:

- 1) That the appellant has been a member of Dir Levies Force having a considerable length of service at his credit (Copy of Appointment Order is Annexure "A").
- 2) That services of the appellant were initially regulated under the Federal Levies Force Rules, 1962, which were non-statutory.
- 3) That subsequently, the Governor Khyber Pakhtunkhwa, under the omitted Article 247(4) of the Constitution promulgated the PATA Levies Force Regulations, 2012. Consequently, the Provincial Government framed Service Rules for the Levies Force in 2013 (Copy of relevant text of Service Rules notified in February 2013 is Annexure "B").
- 4) That Schedule-III of the above mentioned Rules, which provided for length of service towards retirement had certain anomalies. Hence, the said Rules were amended in December 2013 and the above stated anomalies were removed to a larger extent (Copy of amended Rules notified in December 2013 are Annexure "C").
- 5) That the relevant Rules were further amended in July 2020. Regarding the length of service towards retirement, Rule 17 was amended to the effect that all Levies personnel shall retire from service on attaining the age of superannuation i.e Sixty Years. Furthermore, Schedule-III which provided for certain length of service, was deleted by virtue of the amendment (Copy of amendments notified in July 2020 are Annexure "D").

superannuation was again omitted and Schedule-III was revived with certain amendments (Copy of amended Rules notified in March 2021 are Annexure "E").

- 7) That the appellant alongwith other similarly placed personnel of the Levies Force got retired from service on reaching certain age/completion of certain length of service as prescribed by the above mentioned Rules.
- 8) That the Provincial Government made further amendments in the Federal Levies Rules on 21-10-2021, whereby retirement age in respect of lower ranked members of the Force was enhanced by a few years. Hence, the appellant was reinstated in light of the amended rules (Copy of amended Levies Rules while reinstatement order is Annexure "F").
- 9) That finally, the appellant got retired from service on attaining 45 years of age in light of the subsequent amendment (Copy of retirement order is attached as Annexure "G").
- 10) That the appellant filed Departmental Appeal before the respondent No.2 (Copy of representation is attached as Annexure "H").
- 11) That despite the lapse of statutory period, the appeal has not been decided.
- 12) That being aggrieved with the impugned notifications and subsequent retirement order, the instant appeal is being filed before this Hon'ble Tribunal, *inter alia*, on the following grounds:

**GROUND:**

- A) That the impugned act of amending the relevant Service

retirement is illegal and un-Constitutional. Hence, the same acts are liable to be declared as such.

- B) That it is a settled law that service rules cannot be amended to the detriment of public sector employees. Even, if they are so amended, the same having prospective effect cannot be applied against the existing employees
- C) That after the 25<sup>th</sup> Constitutional amendment, the new Constitutional regime demanded streamlining of the erstwhile Tribal Areas with the rest of the Province. So much so, Levies personnel serving in erstwhile FATA and Khasadar Force were accommodated to a larger extent where the Provincial Assembly passed an Act aimed at streamlining the service structure of Ex. FATA Levies Force. The Act not only provides uniform retirement age i.e 60 years for the whole Force but rather enjoins upon the Provincial Government to take steps towards absorption of the said Levies and Khasadars in regular police. Regrettably, the appellant has been treated in violation of the Constitutional spirit particularly after the 25<sup>th</sup> Constitutional amendment and subsequent orders.
- D) That further grounds, with leave of this Hon'ble Tribunal, would be raised at the time of oral submissions.

It is, therefore, humbly prayed that on acceptance of this appeal,

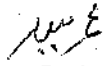
- (i) The impugned Notifications **No. SO(Police-II)HD/MKD/Levies/Misc./2020** & **No. SO (Police-II)HD/1-3/Federal Levies 2021** dated **21-10-2021** and subsequent retirement order issued by respondent No.3 be declared as illegal, the same may be set aside.

attaining 60 years of age in light with Notification dated 14-07-2020.

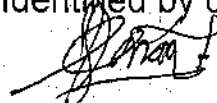
Alternatively, the impugned notifications may be declared to be ineffective upon the rights of the appellant and the appellant be allowed to complete his service till attaining 60 years of age.

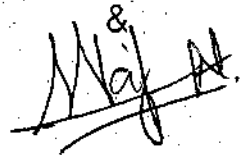
- ii) Any other remedy though may not specifically prayed for, but which circumstances of the case would demand in the interests of justice, may also be granted.

Appellant

  
Umar Said

Identified by counsels

  
Umar Sadiq Advocate High Court

  
Wajahat Ullah Advocate

**CERTIFICATE:**

Certified that no such like appeal has earlier been filed before this Hon'ble Tribunal on the subject matter.

Appellant



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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR (CAMP COURT AT SWAT)**

**Service Appeal No. \_\_\_\_\_ of 2024**

Umar Syed.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa and another

.....Respondents

**AFFIDAVIT**

I, Umar Syed (Appellant), do hereby solemnly affirm and declare that the contents of the above titled Appeal are true and correct to the best of my knowledge and belief. Furthermore, no such like appeal has earlier been filed before this Hon'ble Tribunal or elsewhere on this subject matter

DEPONENT



Umar Syed

NIC # 15307-5086372-9,

**ATTESTED**  
**ZAHID**  
**OATH COMMISSIONER**  
**DISTRICT COURTS SWAT**  
S.No.: 175.....Dated: 2/9/24



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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR (CAMP COURT AT SWAT)**

Service Appeal No. \_\_\_\_\_ of 2024

Umar Said ..... Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa and another ..... Respondents

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Umar Said S/o Ahmad Said R/o Ouch Tehsil Adenzai,  
District Dir Lower [Sepoy Belt No.2113].  
(NIC#15307-5086372-9) (Cell# )

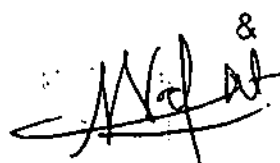
**RESPONDENTS:**

- 1) Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs Department, Civil Secretariat at Peshawar.
- 2) Commandant Dir Levies/Deputy Commissioner Dir Lower at Timergara.

Appellant  


Umar Said  
Identified by counsels

Umar Sadiq Advocate High Court

&  


Wajahat Ullah Advocate

Amma  
A

OFFICE OF THE  
DISTRICT COORDINATION OFFICER  
DIR LOWER.

No. \_\_\_\_\_ /  
Dated Timergara the 01/09/2010.

OFFICE ORDER

Umer Said S/o Ahmad Said r/o Ouch Tehsil Adenzai District Lower Dir is here by appointed as Sepoy in Dir Levies against the Vacant post in the time BPS-5 (3340-160-8140) plus usual allowances as admissible under the rules subject to production of Health and Age Certificate from the Health Department/ MS, DHQ Hospital Timergara.

Districts Coordination Officer  
Dir Lower

No. 3036-32 /A/10(LHC),

Copy forwarded to the :-

1. District Accounts Officer Dir Lower Timergara.
2. Subedar Major Dir Levies, Dir Lower.
3. Official Concerned For compliance.

Districts Coordination Officer  
Dir Lower

C.T.C  
Kee

Annex B

9

GOVERNMENT

G A Z E T T E E D



# KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 15TH FEBRUARY, 2013.

GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT

## NOTIFICATION

Peshawar the 4th February 2013

### SERVICE RULES FOR FEDERAL LEVIES FORCE IN PATA

In exercise of the powers conferred by Section 9 of the PATA Levies Force Regulation, 2013 the Provincial Government of Khyber Pakhtunkhwa is pleased to make the following rules, namely:-

1. **Short title and commencement**- (1) These rules may be called Provincially Administered Levies Force Areas (PATA) Federal Levies Force Service (Amended) Rules 2013.

(2) They shall come into force at once.

2. **Definitions**-(1) In these Rules, unless the context otherwise require, the following expressions shall have the meaning hereby respectively assigned to them, namely:-

(a) "Appointing Authority" means the appointing authority specified in rule 4

(b) "Commandant" means Commandant of the Force, who shall be the Deputy Commissioner in their respective jurisdiction;

(c) "Deputy Commandant (Operation)" means an Assistant Commissioner, deputy officer of the District designated as such by the provincial government who shall be Deputy Commandant (Operation) of the Force in PATA, to exercise in his respective jurisdiction such powers and perform such functions as may be prescribed, and who shall be responsible to the Commandant for operational matters of the Force in PATA.

(d) "Deputy Commandant (Administration)" means Deputy Commandant (Administration) of the Force, who shall be an officer of the provincial government or any officer of the District designated as such by the provincial government to exercise in his respective jurisdiction such powers and perform such functions as may be prescribed and who shall be responsible to the Commandant for administration and establishment matters of the Force in PATA.

(e) "Government" means the Government of Khyber Pakhtunkhwa;

(f) "Home Department" means Provincial Home & Tribal Affairs Department;

(g) "Initial recruitment" means appointment made other than by promotion or transfer;

(h) "Schedule" means the Schedule appended to these rules;

*Signature*  
*DE 12/02/13*

*C.T.C*

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C-1-c

S.#	Post/Rank	Length of service / Age
1	Subedar Major (BS-10)	38 years service or 03 years service as Subedar or 57 years age whichever is earlier
2	Subedar (BS-13)	35 years service or 03 years service as NaibSubedar or 64 years age whichever is earlier
3	NaibSubedar (BS-11)	32 years service or 03 years service as NaibSubedar or 61 years age whichever is earlier
4	NaibSubedar (BS-8)	29 years service or 03 years service as Naik or 48 years age whichever is earlier
5	Naik (BS-7)	28 years service or 03 years service as Naik or 45 years age whichever is earlier
6	Naik (BS-6)	23 years service or 02 years service as Naik or 42 years age whichever is earlier
7	Naik (BS-5)	20 years service or 02 years service as Naik or 39 years age whichever is earlier

SCHEDULE - III  
See Rule 17

650 - KHAYER PAKTUNKHA GOVERNMENT GAZETTE EXTRAORDINARY, 15th FEBRUARY, 2013

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(11)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

Peshawar the 4<sup>th</sup> February 2013

SERVICE RULES FOR FEDERAL LEVIES FORCE IN PATA

In exercise of the power conferred by Section 9 of the PATA Levies Force Regulation 2012, the Provincially Government of Khyber Pakhtunkhwa is pleased to make the following rules, namely:-

1. **Short title and commencement:-** (1) These rules may be called Provincially Administrated Tribal Areas (PATA) Federal Levies Force Service (Amended) Rules, 2013.

(2) They shall come into force at once.

2. **Definition:-** (1) In these Rules, unless the context otherwise require, the following expression shall have the meaning hereby respectively assigned to them, namely:-

- (a) "Appointing Authority" means the appointing authority specified in rule-4;
- (b) "Commandant" means Commandant of the Force, who shall be the Deputy Commissioner in their respective jurisdiction;
- (c) "Deputy Commandant (Operation)" means as Assistant Commissioner or any officer of the District designated as such by the provincial government who shall be Deputy Commandant (Operation) of the Force in PATA, to exercise in his respective jurisdiction such power and perform such functions as may be prescribed; and who shall be responsible to the Commandant for operational matters of the Force in PATA.
- (d) "Deputy Commandant (Administration)" means Deputy Commandant (Administration) of the Force, who shall be an officer of the provincial government or any officer of the District designated as such by the provincial government to exercise in his respective jurisdiction such powers and perform such functions as may be prescribed and who shall be responsible to the Commandant in administration and establishment matters of the Force in PATA.
- (e) "Government" means the Government of Khyber Pakhtunkhwa;
- (f) "Home Department" means Provincial Home & Tribal Affairs Department;

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SCHEDULE-III  
See Rule 17

S.#	Post/Rank	Length of service/Age
1	Subedar Major (BS-16)	38 years service or 03 years service as Subedar Major or 60 years age whichever is earlier
2	Subedar (BS-13)	35 years service or 03 years service as Subedar or 57 years age whichever is earlier
3	Naib Subedar (BS-11)	32 years service or 03 years service as Naib Subedar or 54 years age whichever is earlier
4	Havaldar (BS-8)	29 years service or 03 years service as Havaldar or 51 years age whichever is earlier
5	Naik (BS-7)	26 years service or 03 years service as Naik or 48 years age whichever is earlier
6	L/Naik (BS-6)	23 years service or 03 years service as L/Naik or 45 years age whichever is earlier
7	Sepoy (BS-5)	20 years service or 42 years age whichever is earlier

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Home & Tribal Affairs Department  
Dated Peshawar the 12th December, 2013

**NOTIFICATION**

No. So (Levy) HD/FW/1-4/2013 Vol. 1. The competent authority has been pleased to further amend Rule 4(2) and Schedule-III of Rules 17 under Part II Regulation for PATA Levy Force, 2012 & Rule 14 of the Provincially Administered Areas (PATA) Federal Levy Force Service (Amended) Rules, 2013 as under:-

**SCHEDULE-I**  
See Rule 4 (2)

S.No	Post/Rank	Eligibility for promotion	Promotion Quota	Direct Quota	Qualification
	Subedar Major (BS-12)	One year service as Subedar	100%		
	Subedar (BS-13)	One year service as Naib Subedar	100%		
	Naib Subedar (BS-11)	One year service as Hawaldar	100%		
	Hawaldar (BS-8)	One year service as Naik	100%		
	Naik (BS-7)	One year service as Lance Naik	100%		
	Lance Naik (BS-6)	Five year service as Sepoy	100%		
	Sepoy (BS-5)			100%	Middle Matric
	Head Armorer (BPS-5)	Five years service as Assistant Armorer	100%		Middle Matric of Arms
	Assistant Armorer (BPS-1)			100%	Middle Matric of Arms

**Rule-17 (Retirement)** (1) All uniform levy personnel shall retire as per Schedule-III or not for retirement after completion of 25 years of regular service and no extension beyond retirement shall be granted.

**SCHEDULE-III**

Rule-17 Retirement

Post/Rank	Length of service / age for retirement.
Subedar Major (BS-12)	37 years' service or 60 years of age whichever is earlier
Subedar (BS-13)	35 years' service or 60 years of age whichever is earlier
Naib Subedar (BS-11)	33 years' service or 60 years of age whichever is earlier
Hawaldar (BS-8)	31 years' service or 60 years of age whichever is earlier
Naik (BS-7)	29 years' service or 60 years of age whichever is earlier
Lance Naik (BS-6)	27 years' service or 60 years of age whichever is earlier
Sepoy (BS-5)	25 years' service or 60 years of age whichever is earlier

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Government of Kyber Pakhtunkhwa,  
Home & Tribal Affairs Department  
Dated Peshawar the 12<sup>th</sup> December, 2013

(19)

**NOTIFICATION**

No. SO(Levies)HD/FLW/1-1/2013/Vol.1. The Competent authority has been pleased to order further amendments in Schedule-I of Rule-4(2) and Schedule-III of Rules-17 under Para of the Regulation for PATA Levies Force, 2012 & Rule-24 of the Provincially Administered Area (PATA) Federal Levies Force Service (Amended) Rules, 2013 as under:-  
Rule-4(2) Schedule -I

**SCHEDULE-I**  
See Rule 4(2)

Uniformed Force		Eligibility for promotion	Promotion Quota	Direct Quota	Qualification
S.No	Post/Rank				
1.	Subedar Major (BS-16)	One year service as Subedar	100%		
2.	Subedar (BS-13)	One year service as Naib Subedar	100%		
3.	Naib Subedar (BS-11)	One year service as Hawaldar	100%		
4.	Hawaldar (BS-8)	One year service as Naik	100%		
5.	Naik (BS-7)	One year service as Lance Naik	100%		
6.	Lance Naik (BS-6)	One year service as Sepoy	100%		
7.	Sepoy (BS-5)			100%	Middle Pass/Matric
8.	Head Armorer (BS-5)	One year service as Assistant Armorer	100%		Middle Pass/Matric
9.	Assistant Armorer (BS-1)			100%	Middle Pass/Matric

**Rule-17 (Retirement):** (1) All uniform levy personnel shall retire as per Schedule-III or opt for retirement after completion of 25 years of regular service and no extension beyond retirement shall be granted.

**SCHEDULE -III**  
Rule -17 (Retirement)

S.No	Post/Rank	Length of service/age for retirement
1.	Subedar Major (BS-16)	37 years' of service or 60 years of age whichever is earlier
2.	Subedar (BS-13)	35 years' of service or 60 years of age whichever is earlier
3.	Naib Subedar (BS-11)	33 years' of service or 60 years of age whichever is earlier
4.	Hawaldar (BS-8)	31 years' of service or 60 years of age whichever is earlier
5.	Naik (BS-7)	29 years' of service or 60 years of age whichever is earlier
6.	Lance Naik (BS-6)	28 years' of service or 60 years of age whichever is earlier
7.	Sepoy (BS-5)	25 years' of service or 60 years of age whichever is earlier

C.T.C

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(16)

BETTER COPY  
HOME DEPARTMENT  
NOTIFICATION  
Dated Peshawar the 14-07-2020

No. SO (Police-IDHD/1-3: In exercise of the power conferred by Section 9 of the Provincially Administered Tribal Areas Levies Force Regulation 2012, the Government of the Khyber Pakhtunkhwa is pleased to direct that in the Provincially Administered Tribal Areas (PATA) Federal Levies Force Service (Amended) Rules, 2013, the following further amendments shall be made, namely:

Amendments

In the said rules:-

a) For rule 17, the following shall be substituted, namely:

"17. Retirement.— All Levies Personal shall retire from service on attaining their age of superannuation i.e sixty (60) years or they may opt for retirement after completion of twenty-five (25) years regular service, and

b) Schedule-III shall be deleted.

SECRETARY TO  
GOVT. OF KHYBER PAKHTUNKHWA  
HOME DEPARTMENT

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To be substituted notification of even No & date.

Annex  
E



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME AND TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

Peshawar, dated the 22-3-2021

No. SO(Police-II)HD/MKD/Levies/Misc./2020:- In exercise of the powers conferred by Section-9 of the PATA Levies Force Regulation, 2012, the Provincial Government of Khyber Pakhtunkhwa is pleased to direct that in the PATA Federal Levies Force Service (Amended) Rules, 2013, the following further amendments shall be made, namely:-

Amendments

In the said rules:-

1. In Rule 4, sub-rule (1), the following shall be substituted, namely:

"(I) Commandant shall be the appointing authority for initial recruitment and promotion up to the rank of Subedar:

Provided that the appointing authority for purpose of promotion to the posts of Subedar Major and Superintendents shall be Secretary, Home Department."

2. For Rule 17, the following shall be substituted namely;

"17. Retirement: All Levy personnel shall retire as per Schedule-III and no extension in service after retirement shall be granted"

3. For Schedule-III, the following shall be substituted, namely:

"Schedule-III

[see rule 17]

S. No.	Name of the Post / Rank	Qualification for Promotion	Length of Service / Age
1	Subedar Major (BS-16)	On the basis of Seniority-cum-fitness from amongst the Subedars having Intermediate Qualification	Thirty Seven Years or Three Years' Service as Subedar Major or Sixty Years of age whichever is earlier
2	Subedar (BS-13)	By promotion, on the basis of Seniority Cum Fitness in the following manner, namely: (i) Fifty Percent (50%) from amongst the Naib Subedars having intermediate qualification; and (ii) Fifty Percent (50%) from amongst Naib Subedars having Secondary School Certificate	Thirty Five Years service or Five Yeras service as Subedar or Sixty years of age whichever is earlier
3.	Naib Subedar (BS-11)	By promotion, on the basis of Seniority Cum Fitness in the following manner,	Thirty Three Years' Service or Seven Years' Service as Naib

C.T.C

(18)

S. No.	Name of the Post / Rank	Qualification for Promotion	Length of Service / Age
4	Hawaldar (BS-08)	qualification; and (ii) Fifty Percent (50%) from amongst Hawaldars.	Thirty One years service or Three years service as Hawaldar or Fifty One years of age, whichever is earlier.
5	Naik (BS-07)		Twenty Nine years service or Three years service as Naik or Forty Eight years of age, whichever is earlier.
6	L/Naik (BS-06)		Twenty Seven years service or Three years service as L/Naik or Forty Five years of age, whichever is earlier.
7	Sepoy (BS-05)		Twenty Five years service or Forty Two years of age, whichever is earlier.

**SECRETARY TO  
GOVERNMENT OF KHYBER PAKHTUNKHWA,  
HOME & TRIBAL AFFAIRS DEPARTMENT**

**Copy forwarded to the:-**

1. Principal Secretary to the Governor, Khyber Pakhtunkhwa.
  2. Principal Secretary to the Chief Minister, Khyber Pakhtunkhwa.
  3. All Administrative Secretaries to Government of Khyber Pakhtunkhwa.
  4. Registrar, Peshawar High Court, Peshawar.
  5. All Commissioners, Khyber Pakhtunkhwa.
  6. All Deputy Commissioners, Khyber Pakhtunkhwa.
  7. Provincial Police Officers, Khyber Pakhtunkhwa.
  8. All Heads of Attached Department in Khyber Pakhtunkhwa.
  9. PSO to the Chief Secretary, Khyber Pakhtunkhwa.
  10. Accountant General, Khyber Pakhtunkhwa.
  11. Direction Information, Khyber Pakhtunkhwa.
  12. The Manger Government Printing & Stationery Department, Khyber Pakhtunkhwa.
- He is requested to publish the above Notification in the Extra Ordinary Gazette of Khyber Pakhtunkhwa and supply 50 copies (Printed) of the same to the Home Department.

Section Officer (Police-II)

C.T.C  
E

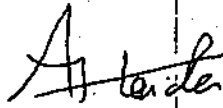
(19)

OFFICE ORDER

In pursuance of Notification N0.PA/Khyber Pakhtunkhwa /Bills-192/2021/8586 dated 30.11.2021 issued by the Secretary Provincial Assembly Khyber Pakhtunkhwa Peshawar and communicated through Section Officer Police-II Home & TAs Department Khyber Pakhtunkhwa Peshawar vide letter No. SO(Police-II)HD/1-3/2020/MKD/Levies dated 02.12.2021, the following levy officials (Sepoys) of Dir Levies Lower Dir who were retired in light of Notification No. SO( Police-II)/HD/MKD/Levies /Misc/2020 dated 22.03.2021, vide this office order No. 1705/LHC dated 25.03.2021 are hereby reinstated into service w.e.f 22.03.2021 in the best public interest:

S.No	Belt No	Designation	Name	F/Name
1.	1670	Sepoy	Akhtar Aziz	Muhammad Khan
2.	1867	Sepoy	Gul Zaman	Nawsher Rawan
3.	1917	Sepoy	Roidar Ali	Nazir Muhammad
4	2037	Sepoy	Nadim Khan	Sher Bahadar Khan
5.	2146	Sepoy	Umar Zada	Taweez Gul
6.	2239	Sepoy	Jamshed	Abdul Star Khan
7.	2113	Sepoy	Umar Said	Ahmad Said
8	1662	Sepoy	Bakht Wazir	Gul Ghani
9.	2070	Sepoy	Muhib ullah	Buzarag Jamil
10.	1657	Sepoy	Jauhar Ali	Fiaz Muhammad
11	1659	Sepoy	Ajmal Khan	Dilawar Khan
12	1672	Sepoy	Habibur Rahman	Sahib ur Rahman
13	1676	Sepoy	Farman ullah	Rizwan ullah
14	1679	Sepoy	Amir Hatam	Habib ur Rahman
15	1710	Sepoy	Itbar Khan	Qasim Jan
16	1723	Sepoy	Imran Khan	Muhammad Fahim Khan
17	1737	Sepoy	Mudasir Jamal	Wazir Zada
18	1757	Sepoy	Muhammad Ikram	Muhammad Rahim
19	1758	Sepoy	Arshad Ahmad	Bacha Nawab
20	1764	Sepoy	Bacha Rahman	Khalid Khan
21	1868	Sepoy	Hazrat Muhammad	Gul Muhammad
22	1906	Sepoy	Said Alam	Bahramand Khan
23	1932	Sepoy	Asghar khan	Shah Wazir Khan
24	1937	Sepoy	Sabir Khan	Sardaraz Khan

27	2042	Sepoy	Azam Khan	Manjawar Khan
28	2056	Sepoy	Shah Khalid	Abdul Kalam
29	2122	Sepoy	Salah ud din	Kamal ud din
30	2141	Sepoy	Amir Asif	Toor Lali
31	2159	Sepoy	Ali Akbar	Fazal Hussain
32	1666	Sepoy	Shah Faisal	Shah Islam
33	2095	Sepoy	Muhammad Hanif	Abdul Hai

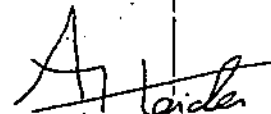
  
 Deputy Commissioner  
 Commandant Dir Levies  
 Lower Dir

No 473-79 /

Dated 09/12/2021

Copy forwarded to the:

1. Secretary to Government of Khyber Pakhtunkhwa Home & TAs Department Peshawar.
2. Commissioner Malakand Division at Swat.
3. District Accounts Officer Dir Lower.
4. All Assistant Commissioners Dir Lower.
5. Subedar Major /Adjutant Dir Levies with the directions to ensure presence of the officials concerned at Levy Head Quarter Chakdara and prepare proper mechanism /proposal for their further deployment.
6. Officials Concerned for compliance.
7. Office file.

  
 Deputy Commissioner  
 Commandant Dir Levies  
 Lower Dir

CTC  
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OFFICE OF THE  
DEPUTY COMMISSIONER/  
COMMANDANT DIR LEVIES, DIR LOWER

No. 2052 /LHC

Dated Timergara the 21/07/2024

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OFFICE ORDER

In pursuance of Notification No. SO (Police-II)/HD/1-3/Federal Levies 2021 dated 21.10.2021 Amended Service Rules 2023 Schedule-III issued by Government of Khyber Pakhtunkhwa Home & Tribal Affairs Department Peshawar, The following Dir Levies personnel are hereby retired from service on attaining the age of 45 years as Sepoy w.e.f noted against each with full pension benefits as per relevant pension rules.

S.No	Reg. No & Name	Designation	Date of Birth	Date of Retirement	Remarks
	No. 1906 Said Alam Khan	Sepoy	30.06.1979	29.06.2024 (A.N)	Retired on attaining the age of 45 years as sepoy
2	No. 1917 Roedar Ali	Sepoy	30.06.1979	Do	Do
3	No. 2113 Umar Said	Sepoy	30.06.1979	Do	Do
4	No. 2146 Umar Zada	Sepoy	30.06.1979	Do	Do

They are further allowed for leave encashment of (365) days in lieu of LPR in lump sum subject to their eligibility, availability of leave in their credit and budget under the relevant Head of account during the current financial year.

Necessary entry to this effect should be made in their service book/sheet roll accordingly.

(Commandant Dir Levies)/  
Deputy Commissioner,  
Dir Lower.

No. 2052-538 /LHC/

Copy forwarded to the:

1. Section Officer (Police-II) Home & TAs Department Peshawar.
  2. Secretary to Commissioner Malakand Division at Swat.
  3. District Accounts Officer Lower Dir.
  4. Subedar Major Dir Levies.
  5. Official Concerned
  6. Office File.
- For information please.

CTC  
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(Commandant Dir Levies)/  
Deputy Commissioner,  
Dir Lower.

خدمت جناب سیکٹری داخلہ صاحب خیبر پختونخوا بمقام پشاور

Anx  
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(22)

عنوان: اپیل نظر ثانی لیویز سروس روز 2013 نوٹیفکیشن مورخہ 21/10/2021

جناب عالی! آپیلانٹ حسب ذیل عرض گزار ہے۔

گزارش ہے۔ کہ مورخہ 26/04/2021 کو پینشنل ہوم سیکٹری صاحب کے زیر صدارت پشاور میں لیویز سروس روز 2013 کے بارے میں ایک اجلاس منعقد ہوا۔ جس میں دیگر سفارشات کے علاوہ سپاہی ریک کیلئے بالترتیب مدت ملازمت 25 سال سروس اور عمر کی حد 45 سال لانس ٹائیک کیلئے 27 سال سروس اور 47 سال عمر، ٹائیک کیلئے 29 سال سروس اور 49 سال عمر، جوالدار کیلئے مدت ملازمت 31 سال جبکہ عمر کی حد 51 سال مقرر کرنے کی سفارش کی گئی ہے۔

جبکہ اسکے برعکس اوپر کے تین رٹکنس صوبیدار میجر، صوبیدار اور نائب صوبیدار کیلئے عمر کی حد 60 سال برقرار رکھا گیا ہے۔ چونکہ سائیل کو مورخہ 01/07/2024 صرف 45 سال کی عمر میں ریٹائرڈ کیا گیا ہے۔ جو کہ لیویز ملازمین کے درمیان امتیازی سلوک کے مترادف ہے۔

لہذا بذریعہ آپیل ہذا استدعا ہے کہ آپ صاحبان مہربانی کر کے مذکورہ بالا حقائق کو مد نظر رکھتے ہوئے سپاہی ریک کیلئے 25 سال ملازمت اور عمر کی حد 60 سال، لانس ٹائیک کیلئے 27 سال سروس اور 60 سال عمر، ٹائیک کیلئے 29 سال سروس اور عمر 60 سال اور جوالدار کیلئے 31 سال سروس اور عمر 60 سال پر نظر ثانی کر کے ریٹائرڈ ملازمین کے مطابق نوٹیفکیشن مورخہ 21/10/2021 کے نوٹیفکیشن کو منسوخ کرنے اور سائیل دوبارہ بھاک کرنے کے احکامات صادر فرمائی جاویں۔

المرقوم 25/07/2024

عمر سید

عزیز

0344-9020060

عمر سید ولد احمد سید بیلٹ نمبر 2113 سکند اوج غربی تحصیل آدیزائے۔

Issue Branch. Home Deptt.

Diary No. 12779 Dated 25/7/24.

Spt Secy. -

Adpl Secy. ....

Diary No. ....

CF

(SOL) FOR NIA P 25/7/24

~~Diary No. ....  
Adpl Secy. ....  
Spt Secy. ....  
Diary No. ....  
Home Deptt.~~

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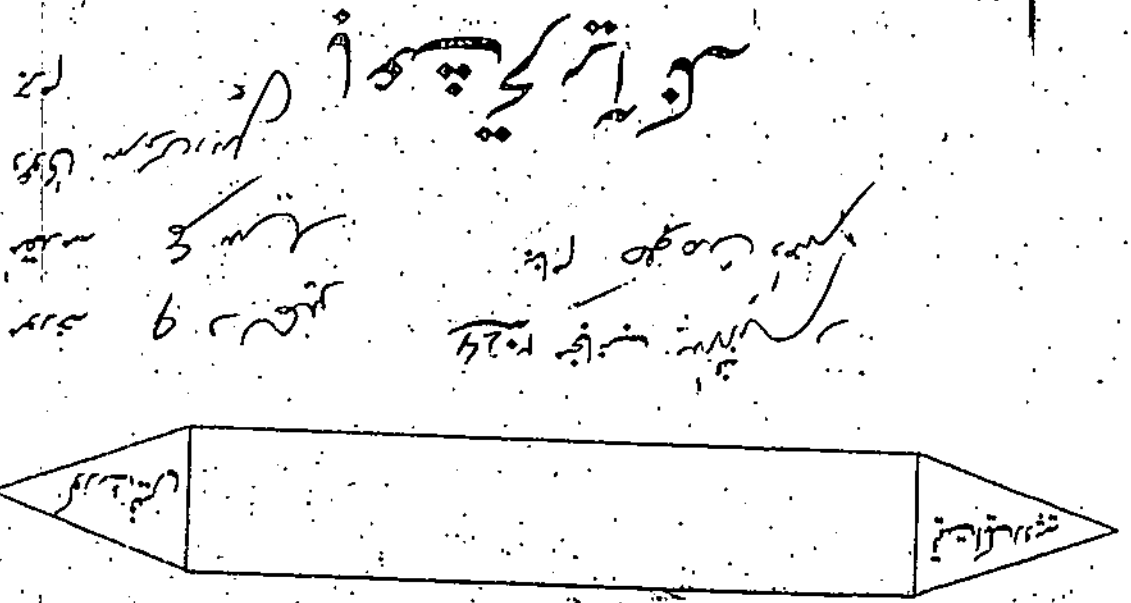
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