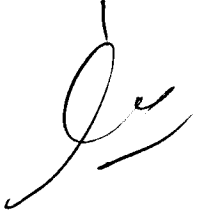


BEFORE THE ELECTION COMMISSION OF PAKISTAN

(Through Secretary Election Commission of Pakistan)



**REPRESENTATION UNDER SECTION 21(3)
FOR AMENDMENT TO THE PROPOSED
NATIONAL ASSEMBLY CONSTITUENCIES
OF DISTRICT SWAT IN PARTICULAR THE
PROPOSED CONSTITUENCY NA-2 SWAT -1
AS PUBLISHED IN THE DRAFT LIST OF
CONSTITUENCIES EXCLUDING THE
TEHSIL CHARBAGH FROM NA-2 SWAT 1
AND INCLUDING THE SAME IN NA-3
SWAT 2**

Respectfully Sheweth;

May it please this honorable Commission:

1. That applicant is permanent resident of village Charbagh, tehsil Charbagh, and registered as voter in the same area of district Swat.
2. That in the draft list of constituencies as finalized and published under Section 21 of the Election Act, 2017 read with Rule 10(7) and 11 of the Election rules the applicant falls in NA-2 Swat-1 of the Draft list of constituencies and prefers this representation on the following grounds:

GROUND

- A. **That** the proposed constituency NA-2 Swat 1 has been drawn/finalized without adhering the principles of delimitation as enunciated in Section 20 of the Election 2017 read with Rule 10 of the Election rules 2017.
- B. **That** Tehsil Charbagh making part of the Constituency NA-2 Swat I, in the draft list which starts from the extreme north end of the Swat, Kalam area, and runs down towards the far end of Tehsil Charbagh running through almost one hundred and twenty Kilometers stretch on the main road. The proposed constituency does not make geographic and regional sense and makes the longest and highly inconvenient electoral constituency in the District. A large number of different population pockets lies in the valleys with access routes from this longest

route/road making it highly inconvenient electoral constituency particularly for the population of Tehsil Charbagh which is contiguous with Tehsil Babuzai (Draft/proposed NA-3 Swat II)

(Reference is made to the maps annexed herewith marked – A & B)

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- C. **That** the proposed constituency as drawn violates the principle of homogeneity and public convenience in the delimitation of constituencies. Owing to the geographic, economic and communication connectivity and interdependence, Tehsil Charbagh is contiguous and homogeneous with Tehsil Babuzai, while the QH of Shemezai, Tehsil Matta is contiguous and interconnected with Tehsil Behrain and Tehsil Khawazakhela. Tehsil Charbagh is closely connected, homogeneous and linked with Babuzai Tehsil (NA-3 Swat II). Thus excluding Tehsil Charbagh from proposed NA-3 Swat II and making it part of the highly stretched and disproportionately over stretched constituency (NA-2 Swat I) is unjustified and unwarranted by all standards and principles.
- D. **That** the proposed draft constituency ostensibly drawn in view of the Northern end and proceeding clock-wise principle as enunciated in Rule 10(5) ignores the other principles of the said provision. The constituency starting from the extreme north end proceeds uniformly down towards the starting areas of Tehsil Matta, including/containing Patwar circles Asharray, Darmai, landi Garhi Patwar of the said tehsil but abruptly deviates the uniform progression in zigzag manner and lopsidedly proceeds towards Charbagh Tehsil which is geographically contiguous with the District Headquarter Saidu Sharif and the main city of the district, Mingora. In this manner the proposed constituency break the administrative unit of Tehsil Matta, and even the Qanungo Halqa, thus leaving behind a number of contiguous, socially homogeneous and inseparable connected patwar circles of the said QH, and further encompass the entire Charbagh Tehsil to meet the population requirement for the constituency at the expense of homogeneity, geographical compactness, public convenience and administrative units.

IN VIEW OF THE ABOVE IT IS PROPOSED THAT ON ACCEPTANCE OF THIS REPRESENTATION THE CONSTITUENCY NA 2 SWAT -1 AND THE NA CONSTITUENCIES OF DISTRICT SWAT MAY BE DELIMITED IN THE FOLLOWING MANNER:

1. The national assembly constituency NA-2 Swat-1 starting from the northern end of the district proceeding in the clock-wise zigzag manner down towards Matta Tehsil encompassing Tehsil Behrain, Census Charge No. 3 Behrain MC, Khawaza Khela Tehsil, Census Charge No. 2 of Khawazakhela MC, and Matta MC and Shamezai Qanungo Halqa of

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[Signature]

Matta Tehsil which includes the Patwar circle Asharray, Darmai, Landi Garhi, Sakhra, Bara Darushkhela, Baidara, Chuprial, Matta Kharerai, Shakardara. For homogeneity and consistency with the draft provincial assembly constituency PK-9 Swat 8, the Patwar circle Bar Thana of Qanungo Halqa Sehbujni of Tehsil Matta may also be included in the proposed constituency of the District. It is averred here that Bar Thana Patwar circle is included in the Sehbujni QH but is inhibited by Shamezai clan/qaum, and the main access/transport route to the same patwar circle is through Shamezai area.

In this proposed delimitation of constituency the population distribution of the district as per the census data published by the Pakistan Bureau of Statistics is:

S. No	Tehsil	Population
1	Tehsil Behrain	248474
2	Khawazakhel	265571
3	QH Matta Shemezai	206381
4	Matta MC	42647
5	PC Barthana of HQ Sehbujni	22890
	Total Population	785963

Census data from Pakistan Bureau of Statistics is annexed herewith marked – C

- The national assembly constituency NA-3 Swat-2 starting from the northern curve in Tehsil Charbagh and proceeding in the clock-wise zigzag manner encompassing the entire Tehsil Charbagh and the contiguous Tehsil Babuzai.

In this proposed delimitation of constituency the population distribution of the district is as per the census data published by the Pakistan Bureau of Statistics is:

S. No	Tehsil	Population
1	Charbagh	126115
2	Babuzai	599040
	Total Population	725155

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3. The national assembly constituency NA-4 Swat-3 starting from Tehsil Barikot and proceeding in the zigzag manner encompassing the entire Tehsil Barikot, further proceeding in the clockwise manner including the contiguous Tehsil Kabal and the entire HQ of Matta Sehbujni, of Tehsil Matta excluding PC Bar thana.

In this proposed delimitation of constituency the population distribution of the district is as per the census data published by the Pakistan Bureau of Statistics is:

S. No	Tehsil	Population
1	Tehsil Barikot	184000
2	Tehsil Kabal	420374
3	QH Matta Sehbujni of Tehsil Matta	194078
	Total Population	798452

It is therefore prayed that on acceptance of the instant representation in view of the above the delimitation of the NA constituencies of District Swat may kindly be delimited as proposed.

Hayat 2/4/2018
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