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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**

Respectfully Sheweth:

May it please this honorable Commission:

1. That applicant is permanent resident of village Durushkhela, tehsil Matta, and is enrolled 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-1 Swat-III of the Draft list of constituencies and prefers this representation on the following grounds:

GROUNDS

- A. That the proposed constituency NA-2 Swat I and NA-4 Swat III have 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 the proposed constituencies of NA-2 Swat I and NA-4 Swat III, breaks the administrative unit of Tehsil Matta in multiple ways negatively affecting the electoral process and public. Tehsil Matta is the largest Tehsil of Swat comprising two Qanungu Halqas, i.e. Tehsil Shamezai and Tehsil Sehbujni. In the proposed delimitation of three PC's of Tehsil Shamezai i.e. Asharray, Darmai and landi Garhi have been made part of NA-2 Swat I while PCs Bara Darushkhela, Baidara, Chuprial, Matta Kharaira, Sakhra and Shakardara including MC Matta have been made part of NA-4 Swat III. Dividing the Matta Shamezai QH in two NA constituencies is a cause serious concern of the applicant as well as the residents and voters of Tehsil Saamezai.

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C. That the proposed constituency of NA-2 Swat I starts from the extreme north end of the Swat, and proceeds in a clock-wise zigzag manner towards Tehsil Matta and Khwazakhela including PCs Asharai, Darmai and Landi Ghari of Tehsil Matta. Contrary to rules of delimitation the proposed constituency stops at above mentioned PCs of Matta Tehsil and lopsidedly proceeds along the Khwazakhela Tehsil and further proceeds including the entire Charbagh Tehsil which is homogeneous in all aspects, as well as contiguous with the Babuzai Tehsil making part of NA-3 Swat II. The proposed constituencies therefore cause inconvenience serious disadvantages not only to the electorate of Charbagh Tehsil by their inclusion in NA-2 Swat I and also breaks the homogenous, inter-related and inseparable large population of QH Tehsil Shamezai of Matta Tehsil through their breaking up in two constituencies, i.e. NA-2 Swat I and NA-4 Swat III.

(Refer to the maps annexed herewith marked - A & B)

- D. 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 the communities interrelationship and interdependence, Tehsil Charbagh is contiguous and homogeneous with Tehsil Babuzai, while the QH of Shamezai, Tehsil Matta is contiguous and interconnected with Tehsil Behrain and Tehsil Khawazakhela, Matta Shamezai.
- E. That the compactness of areas, the geographic spread of the territory vis a viz the population density has not been taken into consideration in the proposed delimitation. District Swat is spread over 5367 sq KM area. Tehsil Behrain is spread over 3184 sq KM area with a population density of 78 per sq KM. Including Tehsil Charbagh which is contiguous with Tehsil Babuzai and the district headquarters, in the proposed constituency of NA-2 Swat III and excluding the QH Shamezai of Matta Tehsil from the same constituency which is contiguous, adjacent, compact and homogeneous with Tehsil Behrain and Khawazakhela is unwarranted and unjustified by all standards.

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

1. The national assembly constituency NA-2 Swat-I 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 Matta Tehsil including the Patwar circle Asharray, Darmai, Landi Garhi, Sakhra, Bara Darushkhela, Baidara, Chuprial,

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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 Schbujni 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 Schbujni QH but is inhibited by Shamezai clan/qaum, and the main access/transport route to the same patwar circle is through Shamezai area.

2. 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 Schbujni	22890
	Total Population	785963

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

3. 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:

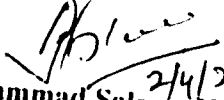
S. No	Tehsil	Population
1	Charbagh	126115
2	Babuzai	599040
	Total Population	725155

4. 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 Schbujni, of Tehsil Matta. 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	
2	Tehsil Kabal	184000
3	QII Matta Schbujni of Tehsil Matta excluding PC Barthana	420374
	Total Population	194078
		798452

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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.


 2/4/2018
 Muhammad Saleem Khan
 S/O Muhammad Afzal Khan
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VOTE NO 419
 BLOCK CODE 00801505
 BARA DURESHKHELA
 TEH MATTA DIST SWAT