

**BEFORE:**

**The Election Commission of Pakistan,  
Islamabad.**

**MEMORANDUM OF REPRESENTATION/  
OBJECTION PETITION UNDER  
SECTION 21(3) OF THE ELECTION  
ACT, 2017 R/W RULE 11 OF THE  
ELECTION RULES, 2017 AGAINST THE  
PROPOSED DELIMITATION OF PK-28  
BATTAGRAM-I.**

*103/04/2018*

Respectfully submitted:

1. That, the petitioner is a registered voter of PK-28, Battagram-I formerly PK-60 and is aggrieved due to inclusion of Patwar Circles Paimal Sharif, Thakot, Huttal Deeshan and Biskot/Barsar by excluding the same from PK-29 formerly PK-59.

*(Copy of the proposed notification is attached herewith as annexure "A").*

2. That, District Battagram consists of Tehsil Battagram and Tehsil Allai two administrative units separated by a natural geographical boundary of a mountain range with varying height from 8000 to 12000 S.ft. above sea level. Both these administrative unit

03/04/2018

are connected through a narrow gauge road passing through Sohbat Charrey alias Museebat Charrey and Sach Bihar alias Maut Ka Konwa, while Thakot is connected with Battagram through K.K.H and that prior to the proposed delimitation, both the Tehsils had their respective administrative boundaries as the limits of their respective constituencies i.e. PK-59 and PK-60.

3. That, the total population of District Battagram according to the census of 2017 is Rs.4,76,612 Tehsil Battagram having population of 2,96,198 while Tehsil Allai having population of 1,80,414.

*(Copy of the census report of 2017 is attached herewith as annexure "B").*

4. That, inclusion of Patwar Circles Paimal Sharif, Huttal Deeshan, Thakot and Biskot/Barsar in PK-28 in the proposed delimitation is without any geographical or cultural compactness e.g. Paimal Sharif has no access to Allai, and the tribes living in Allai and Battagram are different from each other, Thakot and Allai have different

Mos/07/2018

tribes at times who are inimical to each other. Huttal Deeshan is divided by a river connected only by a cable car and Biskot/Barsar is totally in a different geographical area popularly known as Black Mountains Torghar having proximity with Battagram. All the above factors are not only inconvenient to the intending candidates but particularly to the public at large.

*(Copy of the map of District Battagram and proposed delimitation are attached herewith as annexure "C" & "D").*

- 5. That, prior to the proposed delimitation in the year 2002 also same delimitation was proposed and it too was challenged before this Honourable forum and the objections were upheld by maintaining the delimitation on Tehsil basis.

*(Copy of the judgment/order dated 01.06.2002 is attached herewith as annexure "E").*

- 6. That, in the proposed delimitation PK-1, Chitral and PK-35 Torghar population factor has been ignored due to their geographical

location administrative and communication problems.

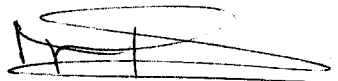
7. That, this Honourable Commission can appoint commission for physical inspection of the proposed delimitation constituency particularly areas of Patwar circles Paimal Sharif, Huttal Deeshan, Thakot and Biskot Barsar.

3  
23/04/2018

.....PRAYER.....

**It is, therefore, most humbly** prayed that on acceptance of the above mentioned grounds, Patwar Circles, Paimal Sharif, Thakot, Huttal Deeshan and Biskot Barsar may please be allowed to remain part of PK-29 Tehsil Battagram instead of PK-28 Tehsil Allai.

Dated 26.03.2018



**Muhammad Nawaz Khan**  
S/o Muhammad Ayub Khan  
R/o Biari, Tehsil Allai.  
.....Petitioner

Through



**TAHIR HUSSAIN LUGHMANI,**  
Advocate Supreme Court,  
Of Pakistan.