BEFORE THE ELECTION COMMISSION OF PAKISTAN. Through Secretary Election Commission of Pakistan, Constitution Avenue Islamabad.

Subject:

REPRESENTATION IN RESPECT OF DELIMITATION OF CONSTITUENCIES OF PK-28 & PK-29 OF DISTRICT BATTGRAM PROVINCE OF KHYBER PAKHTUNKHWA.

Respected Sir,

The applicants humbly submits as under:-

- 1. That the applicant is the bonafide resident of Village Teloos Tehsil Alai District Battgram as well as register voter (Copy of CNIC and voter list attached).
- 2. That District Battgram consist of two Tehsil i.e. 1 Tehsil Battgram 2. Tehsil Alai. Total population of District in accordance with the census of 2017 is 4,76,612. Total population of tehsil Battgram is 2,96,198 and total population of Tehsil Alai is 1,80,414. (Copy of census report 2017 regarding District Battgram is annexed).
- 3. That the commission after receiving the Form-5 with regard to the delimitation of PK-28 and PK-29 published the same as preliminary proposal for the delimitation of PK-28 and PK-29 of District Battgram. (Copy of Map attached).
- 4. That the applicant submitting its objection and making representation on the following grounds and proposal.

GROUNDS:-

- a) That the preliminary proposed delimitation of PK-28 and PK-29 District Battgram is against the basic theme of Sub rule 5 of rule 10 as the population of PK-28 will not be that much closed by including all other Union Council of Tehsil Battgram (PK-29) accept Thakot.
- b) That the delimitation committee did not obtain the actual map of District Batttgram nor conducted physical survey of the District, and therefore committed an error by including Union Council paimal sharif with PK-28 Alai.



- That it is pertinent to mention here that between PK-28 and PK-29 there is series of hills and which naturally bifurcate their two constituencies, and paimal sharif and other has no excess to PK-28 accept Thakot as the only road towards Tehsil Alia goes through Thakot.
- d) That the preliminary proposed delimitation of PK-28 and PK-29 is not full filling the principles of delimitation because of geographically compaction, physical features, existing boundaries of administrative units, facilities of communication and public convenience.
- e) That the committee only based its proposed delimitation on the distribution of population, but rest of the factures and principles has been over looked, therefore the commissioner has the power to make amendment alteration and modification in proposed delimitation of PK-28 and PK-29 District Battgram.
- That the applicant also submitting his proposal for delimitation, that from PK-29 only Thakot, Bishkot and Huttal deeshan can be added, because of full filling the most of the principles of delimitation, but rest of the areas/union councils of PK-29 will create great problems for the peoples of both the constituencies. (Copy of proposed MAP is attached).
- g) That any other ground will be taken at the time of hearing of representation with the permission of the Hon'ble Commission.

It is therefore humbly requested that the proposed delimitation of PK-28 and PK-29 may please be amended, after and modified to the best interest of peoples of both the constituencies.

Dated: 2-4-2018

Applicant

Sher Ali Khan s/o Muqarab Khan, Village P.O Teloosa tehsil Alai,

District Battgram.

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