

BEFORE THE ELECTION COMMISSION OF PAKISTAN
AT ISLAMABAD

8/04/07/2016

1. Syed Allauddin S/o Syed Badshah Gul R/o Mangwaltan, Tehsil Charbagh, District Swat.
2. Riyaz Ahmad S/o Mian Said Ali R/o Dakorak, Tehsil Charbagh, District Swat.

... Applicants / Petitioners

Application / Objection against the draft list of constituencies PK-3 & PK-4 and the map thereof.

Respectfully Sheweth:

1. That petitioners are residents of Tehsil Charbagh, District Swat and registered voters of Provincial Constituencies 3 & 4, the electoral roll containing the names of the petitioners at Serial No. 37, Block code 071010115 and Serial No. 37 Block code 071010214.
2. That petitioners have the following objections on the draft list of Constituencies PK-3 & PK-4 as notified along with map by the Election Commission of Pakistan.

Objections:

- i. That the population of Tehsil Khwazakhela consisting of 2,65,571 persons from this Tehsil two (2) Patwar Circles namely Jarepia and Fatehpur have been detached and included in PK-2, Tehsil Bahrain, the majority of Tehsil Khwazakhela has been reduced, whereas the population of Tehsil Matta is 4,65,996 persons, if patwar circles of Darmai and Rahatkot are detached from it and included in Tehsil Bahrain PK-2, it would

8/04/2018

form a compact block because of its boundaries and its location are on one side of river Swat.

- ii. That after dividing Tehsil Khwazakhela, its administrative units have become broken.
- iii. That it may be pointed out that a complete PK constituency could have been established for example, the population of District Swat is 2309570 and 8 and if the total population is divided on 8 Provincial Assembly seats then one PK would consist of 288696 people. Under the ECP Rules, after 10% variations, up and down, in one Provincial Seat, one PK can more be established on population strength of 259800 people. That through this analog, the administrative units of Tehsil Khwazakhela would remain intact without any disturbance.
- iv. That the area of Tehsil Khwazakhela is located purely on one side of the river without any hindrance, therefore, it would be in the benefit of the people of the area (Tehsil Khwazakhela).
- v. That the population of Tehsil Charbagh is 126115. From this Tehsil, 4 Patwar Circles, namely Kishora, Mangarkot, Gulibagh and Dakorak have been detached and according to the notification of ECP, these PC's have been included in Tehsil Khwazakhela. This has also resulted in breaking of the Administrative Units of the area and the majority of the Tehsil Charbagh has been reduced, which is clear violation of the ECP.
- vi. That according to the ECP map, the Patwar Circle of Telegram has been broken and their Muza Jaat namely Saeer, Shinkad, Tuha have been included in PK-3, which is also a clear violation of the ECP Delimitation Rules.
- vii. That PC Kishora and PC Mangarkot have no direct road links with PK-3, the people would go through Saeer, Telegram, Charbagh, Gulibagh and after covering more than 55 KMs

20/04/2018

distance, would reach to PK-3. The people of the area of Kishora and Mangarkot and Gulibagh are in Tehsil Charbagh, their Tehsil offices are located in Charbagh and thus they have no links with Tehsil Khwazakhela. The area of Kishora is a pocket for the people of the area and is in clear violation of the ECP Delimitation Rules.

- viii. That keeping in view the population of Tehsil Charbagh, no new constituency could be established, therefore, the nearby areas / patwar circles are made together, then a new constituency could be established but in the given ECP map / notification the situation is quite different, for example, in MC Mingora Circle No. 24 has been included in PK-4, for approaching this area, about 10 to 15 KM distance would be covered by a voter for casting his vote in PK-4. This area is the headquarter of District Swat, including Judicial Complex, Government Offices, DC office, Education offices and also restricted areas of Circuit House. This area should have been given to MC Mingora due to its sensitiveness.
- ix. That similarly, the same area of Marghuzar, Qambar, Islampur is not accessible through any direct ground route from Sangota or Janbel, Kokarai, which is shown in the ECP map as a neighborhood. For approaching PK-4, they would cover a distance of about 15 to 25 KMs in PK-5, causing inconvenience to the people, which area is a pocket one. This is in clear violation of the ECP Delimitation Rules.
- x. That now according to the ECP map, Patwar Circle of Balogram has been broken and shown in PK-6 and its two number of Muza Jaat is shown in PK-4, which is clear violation of the ECP Delimitation Rules and similarly, PC of Odigram is divided into two portions, one Muza has been included in PK-6 and the other Muza has been included in PK-4, which is in clear violation ipse-dexit on part of the authorities.
- xi. That according to our proposed map, attached with this representation, Tehsil Charbagh (PK-4) and the Patwar Circle

of Tehsil Babuzai and Circle No. 6 of MC Mingora may be made one PK, which is boundary-wise, communication facility and geographical position of the area would much facilitate the wish of the people of these areas, which is shown in the proposed map.

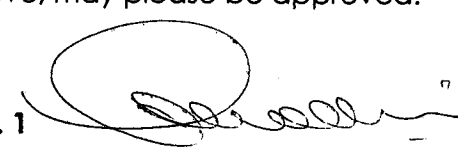
- xii. That if Circle No. 24 is detached from PK-4 and included in PK-5, then all the facilities as available to the people of MC Mingora would also be available to the people of Circle No. 24, which is headquarter of Saidu Sharif.
- xiii. That the area of Salampur, Sheratraf and Qambar is easily approachable to Tehsil Barikot, which in the previous elections was part of one Constituency because of its location on one side of the river and the main road is common in between these areas, therefore, the same may be given to PK-6, by accepting this proposal the Administrative Unit of Tehsil Barikot would remain intact.
- xiv. That according to the ECP map some areas of Tehsil Kabal is included in Tehsil Barikot, where the Administrative Unit of Tehsil Kabal has been broken.
- xv. That the population of Tehsil Kabal is 420374. According to our proposal map, if the area of Tehsil Kabal, Kottlai, Garrai is detached from PK-6 and included in PK-7 then its unity would remain intact because this area is lying on one road and approachable to PK-7 instead of PK-6.
- xvi. That according to ECP map, the Patwar Circle of Tehsil Kabal, Shalhand is shown in PK-8, which is not proper for approach to PK-8, if the above PC is detached from PK-8 and included in PK-7 then it would be in the interest of the people of the area due to its location and communication facilities. The same has been shown in our map and detail of population is attached.

24/04/2012

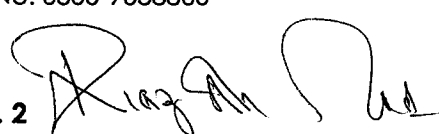
- xvii. That according to the ECP map, the area of MC of Dherai, Kanju, Aligrama, Damghar is shown in PK-7, which is not easily approachable for the people of Dherai, Kanju. If these areas are detached from PK-7 and included in PK-8, it would be reasonable as these areas are lying on one road and these areas are adjacent to each other and the majority of the area will remain intact. These areas were also in one Constituency in the previous elections. Furthermore, this Constituency (PK-8) is on one road and on one side of the road, which is easily accessible to the people of the area.
- xviii. That according to the ECP map, PC Bar Thana is consisting of Muza Lil Bund, which broken. Bar Thana has been shown in PK-9 and Lil Bund is shown in PK-8, which is clear violation of the Delimitation Rules and requires to be placed on one Constituency (PK-9) as per our proposed map and the details of population already attached. The Constituency of PK-9 (according to our proposal) all areas are approachable to each other as well as its tradition are one and the same. Communicational links are also one and the same, which is shown in C&W map, the same is hereby attached for ready reference.
- xix. That besides petitioners, unanimous resolution by all the elected members of Tehsil Charbagh have also requested for changes in the draft list regarding Tehsil Charbagh (Photocopy of resolution along with minutes of emergency meeting by the concerned Tehsil Council Charbagh are attached herewith).

If is therefore, very humbly prayed that, by the acceptance of this petition / objections, the changes mentioned / prayed above, may please be approved.

Applicant / Petitioner No. 1


Syed Allauddin S/o Syed Badshah Gul
R/o Mangwultan, Tehsil Charbagh, District Swat.
CNIC No. 17301-5098445-1
Cell No. 0300-9038860

Applicant / Petitioner No. 2


Riyaz Ahmad S/o Mian Said Ali
R/o Dakorak, Tehsil Charbagh, District Swat.
CNIC No. 15602-1071709-9
Cell No. 0346-9407799

Syed Allauddin

BEFORE THE ELECTION COMMISSION OF PAKISTAN
AT ISLAMABAD

Syed Allauddin and another.

... Applicants / Petitioners

Affidavit:

We, do hereby solemnly affirm and declare on oath, that, all the contents of the accompany petition / objections are true and correct to the best of our knowledge and belief and nothing has been kept concealed or withheld therein.

Deponent:



Syed Allauddin S/o Syed Badshah Gul
R/o Mangwultan, Tehsil Charbagh, District Swat
CNIC No. 17301-5098445-1
Cell No. 0300-9038860
(Petitioner / Applicant No. 1)



Riyaz Ahmad S/o Mian Said Ali
R/o Dakorak, Tehsil Charbagh, District Swat
CNIC No. 15602-1071709-9
Cell No. 0346-9407799

(Petitioner / Applicant No. 2)