Before the Secretary Election Commission KPK



Subject:- Objection petition regarding the constituency of PK-48 Mardan-1, in which Patwar Circle of Takht Bhai , Qanungo Halqa of Takht Bhai Tehsil i-e (i) Shah Bat Khel (ii) Kalo (iii) Mian Issa are included while excluded the Patwar Circle, Katlang Qanungo Halqa of Katlang Tehsil & District Mardan

Sir,

- 1. That the delimitation of constituency of PK-48 is against Rule 10 (5) of the Election Rules 2017, which is the basic requirements for delimitation but the committee ignored the above rules which is the mandatory provision and the word shall has been used but this aspect of rules not taken in to consideration and the committee violated the mandatory rules therefore, the delimitation above is not according to law, rules and regulations.
- 2. That patwar circle (i) Kalo, Shahbat Khel and Mian Issa are the part and parcel of Tehsil Takht Bhai and also the part and parcel of Qamungo Halqa of Tehsil Takht Bhai and these patwar circle are excluded from

Tehsil as well as from Qanungo Halqa and similarly patwar circle of Katlang Qanungo Halqa excluded from the Tehsil Katlang as well as from Qanungo Halqa Katlang. The committee ignored the physical features, have not taken into consideration the administrative unit, the revenue unit the welfare of people of the locality, also ignored the basic requirements of people as approach to the administrative unit, approached to the revenue units to other departments i-e education department, banks and to the other Government Departments.

3. That the committee at the time of preparation of delimitation of PK-48 only taken the documents and on the basis of documents prepared the same but never perused the situation of spot, never examined the revenue paper i-e AKS Shajra Kishtwar of the said area because if the people of the Kalo, Shah bat Khel, Mian Issa intended to approach the other area of KP-48, they should be reached after the journey of 20/25 kilometers and the similar situation of people of Katlang Tehsil because, PK-54 and 55 are situated in between these area through this act of the committee i-

e delimitation people should suffer a lot of difficulties and to this type of delimitation people of the constituency should not be facilitate rather the committee create problems for them.

4.

- Issa not excluded and patwar circle, Qanungo Halqa Katlang i-e Katlang and Bilandi not included, then it should be impossible for the people to communicate with each other and approach to, administrative, revenue untis and it would be create more hurdles in the way of the peoples of constituency, the committee never make the spot / physical investigation and never inspected these areas and make / prepare the documents on the basis of hear say evidence, which is against the basic rules and regulations and also ignored the facilitation and welfare of the peoples.
- 5. That if patwari circle kalo, shahbat Khel and Mian Issa excluded from the PK-48 and patwar circle Katlang and Moza Bilandi included in PK-48, it would not disturbed the population of each delimitation which is clear from the table annexed.

It is therefore humbly requested that the patwari circle i-e Kalo, Shahbat Khel and Mian Issa may be excluded and patwar circle i-e Katlang and Moza Bilandi may be included delimitation in PK-48.

Dated 12/03/2018

Applicant

Fazli Rehman S/o Fazal R/o Katlang Distt: Mardan Through

Shakeel Zada Khan Advocate

High Court Mardan