

HA/30/03/2018
1-4
①

BEFORE THE ELECTION COMMISSION OF PAKISTAN

Representation No. _____/2018

**Representation U/S 21 of the
Election Act, 2017 and other
relevant enabling rules of the
Election Rules, 2017 for the
correction of the limits of the
Constituency PK-67, Peshawar-II**

Respectfully sir:

1. That the petitioner is law abiding citizen of Pakistan, resident of Village Jatti Bala, Daudzai, Peshawar and voter of UC-75, Takht Abad, falling within the jurisdiction of PK-67, Peshawar-II.
2. That the petitioner, being political worker, used to contest the general elections and UC-82 of District, Peshawar, which consists of villages VC-285, Shaghali Bala, VC-286, Shaghali Payan, VC-287, Piyari Payan, VC-288, Zormandi, VC-289, Qilla Shah Baig, VC-290, Bella Muhmandan, VC-291, Sarkhana and the same are part and parcel of one Qanoongo Halqa namely Mathra as geographically these village Councils are separated and incircle by River Shah Alam (branch of Kabul River).
3. It is further to clarify that the Main road of UC-Jogani leads to Peshawar through UC-75, Takht Abad and also separated the other UCs from Jogani.
4. That the UC-90, Chaghar Matti, which is adjacent to UC-82, comprises of Village Councils namely VC-331, Haji-kiramatullah Mandi, VC-332, Chaghar Matti, VC-333, Garanga Bala, VC-334, Barbar, VC-335 Gari Ali Muhammad.

20/03/2018

2

5. That UC-89, Kaniza which is also adjacent to UC-82 and comprises of 7 VCs namely VC-324, Charpariza, VC325, Kaniza, VC-326 Chargula (Shaikh Kalli), VC-327, Shenda, VC-328, Gul Abad, VC-329 Alizai, VC-330, Nisata.
6. That the above-mentioned UC No. 90 and some village councils of UC-89 were falling in previous constituency of PK-7 with their respective complete Qanoongo Halqa Mathra.
7. That in the delimitation process and creation of other seats of PK (specifically in Peshawar), the above-mentioned UCs and their Village Councils have been separated and have been merged in two different PKs i.e PK-66 and PK-67.
8. That the petitioner requests for the amendment/correction of the limits of PK-67, Peshawar-II with the following grounds, inter alia.

GROUND:

- A. That the delimitation of the constituency of PK-67 is in utter volition of section 20 of the ibid act.
- B. That the proposed limitation of PK-67 is against the Geographical, Physical features, existing boundaries of administrative units, facilities of communications, public convenience and homogeneity of the area.
- C. That the area of Pervious PK-8 was consisted of UCs as per sketch annexed as **annexure-A**
- D. That in the areas of previous PK-8, there is River Shah Alam, flowing from west to East and due to this geographical sitatution the people were faciliated to go the polling stations without crossing the River Shah

30/03/2018

3

- Alam as there is no opportunity of bridges to connect the villages and on this analogy the Patwar circle were made.
- E. That in the delimitation process of the constituencies, some of the VCs which were/are part and parcel of one UC have been separated and included in different constituencies of PK, which is not only Geographically inconvenient for the voters, besides, some of the voters of one family, who have their houses in one village, have also been separated, causing difficulties for them to vote for their representatives in general election.
- F. That in the delimitation some of the voters will have to travel for more than 10 KM distance to reach to their polling stations.
- G. That the map proposed, the Geographical situations, the previous map of the UC-82, UC-89 and UC-90 clearly suggest that the proposed delimitation is not convenient for the voters of the locality/ constituency PK-66 and Pk-67 (for this purpose the correct limitation are as under)
- I. That the local bodies of UC-82, UC-89 and UC-90 have also passed their respective resolution regarding the correction of limits of PK-66 and Pk-67. (copies of the resolution are annexed as **annexure B and C**)
 - II. That in the proposed map UC-82 Jogani is bifurcated into PK-66 and PK-67 whereas VC NO285,286,288,289,290 is shown in PK-66 and VC no 287,291 shown in PK-67.
 - III. That similarly in UC-90 Chagharmatti is also bifurcated into PK-66 and PK-67 whereas VC 331,332, are shown in PK-66 and VC 333, 334, 335 shown in PK-67

HA 20/03/2018

(4)

- IV. That UC Kaniza VC No. 328, 329 and 330 in PK-67 VC-324, 325, 326, 327 in PK-66 due to Pajagi Road
- V. In the proposed map the total population pk-66 is 296593 whereas of PK-67 pupolition is 309422.
- VI. That it will be better for the locality if the constituency be divided through natural boundaries of River Shah Alam or through main road namely Takht Abad Road and Pajagi Road, (Copies of map proposed and geographical map are **annexed as annexure D-E**)
- H. That every UC has one District Council Member, one Town Council Member and bifurcating the area of one UC into two different provincial constituencies, will create difficulties/incontinance/hurdles in pin pointing the areas for developmental works and will also cause disparity in utilization of funds.
- I. That the petitioner, with leave of the Hon'ble Commission, will raise additional grounds in support of his stance/contention at the time of hearing of this petition.

Keeping in view the facts and circumstances mentioned above, the limits of PK-67, Peshawar-II may please be corrected. Any other relief in the given facts and circumstances may also be granted

Petitioner

Asif Iqbal Daudzai

CNIC 17301-1476860-3

Dated: ___/___/2018