  
A/24/03/2018 2-6

**BEFORE THE ELECTION COMMISSION OF PAKISTAN**

*Secretary*

Muhammad Islam son of Zareen Shah, resident of Lawa Ghar, Chani Khel, P.O Ghundi Mir Khan Khel, District Karak.

Petitioner

**REPRESENTATION U/S 20 OF THE ELECTION ACT, 2017  
AGAINST PRELIMINARY DELIMITATION REPORT SPECIFYING  
THE AREAS I.E. CHANI KHEL PATWAR CIRCLE OF CHONTRA  
QANUNGO HALQA OF KARAK TEHSIL ALONGWITH KANDU  
KHEL PATWAR CIRCLE TO BE INCLUDED IN PK-86 KARAK-II  
FROM PK-85**

Respectfully submits as under:

1. That petitioner is registered voter registered at Union Council Palosa Sar Patwar Circle Chani Khel, Polling Station GHS Lawagher Chani Khel.
2. That as per census report officially published by Pakistan Bureau of Statistic population of the above mentioned Patwar Circles falling in Union Council Palosa Sar and Isak Chontra the same is hereby reproduced as under:

Population and household detail from block to district level to the extent of above mentioned Patwar Circles;

S. No.	Admin Unit	Population	Number of Houses
1	Azar Khel 048020905	718	58
2	Balbali 048020904	143	22
3	Chani Khel 048020901, 048020902, 048020909, 048020910	7319	674
4	Kurd 048020903, 048020908	1729	234
5	Sarobi 048020906	1200	129
6	Wanki 048020907	1001	117

The total population of the above mentioned Patwar Circle comes to 12110 and total number of houses comes to 1234.

3. That the above mentioned Patwar Circles is surrounded by hilly terrain falling in rigorous mountainous range having no direct

24/05/2018

3/;

access through metaled or rough road to PK-86 Headquarter Takht-e-Nasrati, the indirect route from the said areas, localities goes through District Mianwali, via Essa Khel, District Lucky Marwat, District Bannu and then to PK-86 Headquarter Takht-e-Nasrati, the total distance of this indirect route approximately comes to 85 to 90 K.M, while the other indirect route goes through Union Council Palosa Sar road leading to District Headquarter Karak and then to Village Council Rehmatabad and then to PK-86 Headquarter Takht-e-Nasrati, the total distance of this route is approximately 58 K.M.

4. That the Police Stations, Post Offices, Public Health Drinking Water Supply Schemes, Basic Health Units, PESCO Grid, Revenue Circle of the above mentioned Patwar Circles Chani Khel and Kandu Khel all are falling in PK-85.
5. That above mentioned Patwar Circles (areas) are still existing in Union Council Palosa Sar for the purpose of Local Government, Revenue, District Administration, if the proposed delimitation is finalized and not brought to the previous position then the population of above mentioned Patwar Circles will definitely be deprived from the funds of Union Council Palosa Sar and Isak Chontra including hardship in approaching administrative problems regarding police, revenue, health, clean drinking water, education etc.
6. That the preliminary report regarding delimitation specifying the above mentioned area proposed to be included in PK-86 from PK-85 has been prepared without any representation, holding inquiry or recording any evidence regarding physical features of the areas, existing boundaries, administrative units, communication facilities, public convenience, therefore, petitioner pray for amendments, alteration, modification in the preliminary report specifying the above mentioned areas proposed to be included in PK-86 on the following grounds amongst others:

PA 24/03/2018

4

**GROUND:**

- i. That the population of the above mentioned Patwar Circles falling in Union Council Palosa Sar and Isak Chontra have no direct access or road leading to PK-86 Headquarter Takht-e-Nasrati and the above mentioned areas are geographically located in mountainous range having only easy access to PK-85 Headquarter District Karak including Union Council Palosa Sar, thus the proposed inclusion of above mentioned areas in PK-86 will definitely create enormous hardships for the population concerned.
- ii. That inhabitants of the above mentioned area will have to travel for redressal of their grievances a long distance as there is no facilities of communications directly to PK-86 Headquarter from above mentioned areas, however, if the proposed preliminary report regarding delimitation is amended to the extent that the above mentioned Patwar Circles/ areas are left with PK-85 then the population would have better communication facilities, public convenience including other facilities regarding health, revenue, postal, education, law enforcement assistance etc.
- iii. That the above mentioned areas having such geographical, physical features that if the said areas are not included and left with PK-85 then the whole population will face enormous difficulties and the whole public life would become stand still without undertaking long travel to PK-86 Headquarter Takht-e-Nasrati.
- iv. That other areas located with PK-86 Headquarter, in geographical compactness are there which can easily be included and such delimitation of that areas would not harm or hinder in the daily life of the population, these areas are as under:


Union Council Bahadar Khel having Patwar Circles i.e. Bahadar Khel, Daresh Khel, the total population of Union

24/03/2013

5

Council Bahadar Khel as per recent census report have 19769 population (male female). The distance of Union Council Bahadar Khel to PK-86 Headquarter Takht-e-Nasrati is approximately 25 to 30 K.M.

If the said Union Council is included in PK-86 instead of Patwar Circle Chani Khel and Kandu Khel then it will be more convenient keeping in view geographical compactness, communication, fast access and other administrative facilities alongwith education, health, law enforcements etc.

- 
- v. That both village Councils Chani Khel and Kandu Khel have unanimously resolved through separate resolutions that the population of the above mentioned Patwar Circle are not willing to be included in PK-86 because of the above mentioned hindrances and hardships to be faced by the population in future in case they are included in PK-86. Apart from the above mentioned resolution Tehsil Council of the areas have also passed resolution regarding their reservation on such proposed inclusion of above mentioned areas in PK-86.
- vi. That if the proposed inclusion of above mentioned Patwar Circle in PK-86 are not amended, altered, modified and the said areas are not left in existing status with PK-85 then petitioner alongwith the entire population of the areas will have to suffer irreparable loss for the rest of their life they will have to face inconvenience regarding their revenue matters, health and education facilities including law enforcement, communication, transport etc., therefore, such proposed inclusion of said areas in the preliminary report of delimitation needs to be amended, modified and reversed to its original position in the larger interest of population of above mentioned areas.

24/03/2018

6/3

**PRAYER**

It is therefore most respectfully prayed that the representation of the petitioner may graciously be accepted in light of the above stated submissions and both the Patwar Circles i.e. Chani Khel and Kandu Khel may graciously be reverted back to its original position and may graciously be included in PK-85 in the larger interest of population of said areas.

Any other relief, which this Honourable Forum deems fit and proper may also be granted.



Petitioner

In person

Mobile # 0300-5659409