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BEFORE THE ELECTION COMMISSION OF PAKISTAN

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Through Secretary, Election Commission,
Constitution Avenue, Islamabad.

Subjection: Representation U/S 21(3) of the Election Act, 2013 against the preliminary delimitation of the constituency in respect of PK 46 Swabi IV and PK 45 of Swabi III as under.

The petitioner who is a registered voter in the constituency proposed PK 46 Swabi IV (Annex-1) with due respect submit the following representation/objection petition against the proposed delimitation of PK 46 Swabi IV (Annex-II)

- District Swabi has been proposed to divide into 5 constituencies (Annex-1) where in the constituency have population as under (Annex-II)
 - PK 43 Swabi I 328300
 - PK 44 Swabi II 330218
 - PK 45 Swabi III 317820
 - PK 46 Swabi IV 329211
 - PK 47 Swabi V 319067
- That the principles laid down in section 20 of the Election Act,
 2017 and rules 12 of the election rules, 2017 have not been complied with in strict-sense.
- 3. That Jalbai PC, Jalsai PC (patwar circle of Lahor Qanungo Halqa of Lahor Tehsil) previously included in PK 34 Swabi IV (Now PK 46 Swabi IV) since 1988. Now Jalbai and Jalsai PC having population of 37653 and 26689 respectively (Total 64342) have been made part of PK 46 Swabi IV in proposed preliminary delimitation 2018 (Annex-III)

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- 4. That the most important fact which determines all other factors is facility of communication and public convenience. Jalbai, Jalsai PC being parts of Tehsil Lahor, District Swabi having road, trade and even social connection mostly with other villages of the Tehsil Lahor rather than Tehsil Razar of District Swabi. On this score alone the demand of the petitioner is prima facie and merit consideration.
- 5. That so far as cognate factor is concerned, naturally the people have relations with the people where they feel convenient and have communication facilities as well. Accordingly Jalbai and Jalsai PCs have close relations with residents of Lahor Tehsil. So the homogeneity demands that above said PCs may be included in PK 45 Swabi III to facilitate
- 6. It is, Therefore proposed that Jalbai, Jalsai PCs having population of 64342 may be included in PK 45 Swabi III where as Kunda PC (19771), Shah Mansoor PC (19660) and Zaida MC (31949) having population of 71380 may be included in PK 46 Swabi IV (Annex-III)

the residents of that patwar circle.

Tazh gwapplicants <u>Fazli ilahi S/o Shad Mohammad Khan</u>

VPO Jalbai, Tehsil Lahor, District Swabi Khyber Pakhtunkhwa.

Block Code 033010607, Vote no. 338

<u> Usman Zeb S/o Jehanzeb</u>

VPO Jalbai, Tehsil Lahor, District Swabi Khyber Pakhtunkhwa.

Block Code 033010606, Vote no. 358