

J. (1)

**BEFORE ELECTION COMMISSION OF PAKISTAN,  
THROUGH SECRETARY ECP ISLAM ABAD.**

***SUBJECT: REPRESENTATION / OBJECTION AGAINST THE  
PRELIMINARY DRAFT / REPORT OF DELIMITATION  
WHEREBY THE ELECTION COMMISSION PROPOSED TO  
INCLUDE UNION COUNCIL ISMAILA, IN PK 46 INSTEAD OF PK  
47 OF DISTRICT SWABI, KHYBER PAKHTOONKHWA.***

***PRAYER IN REPRESENTATION:***

***ON ACCEPTENCE OF THIS REPRESENTATION /  
OBJECTION PETITION, THE REPORT OF PROPOSED  
DELIMITATION BE AMENDED AND UNION COUNCIL ISMAILA  
OF DISTRICT SWABI MAY BE INCLUDED IN PK 47 INSTEAD  
OF PK46.***

**RESPECTED SIR,**

**Facts:**


1-That the petitioner belong to village Ismaila of UC Ismaila, Tehsil Razzar, District Swabi and is registered voter at serial No 139 of block code: 065011004.( Copy of CNIC is attached as annexure A).

2-That the petitioner has contested election for the slot of Tehsil Councilor from UC Ismaila and has obtained 1988 Votes in the last local bodies election held in 2015 in the province of KP.

3- That in District Swabi There were two seats of national assembly ie NA 12 & NA 13 and six provincial assembly seats ie PK 31, PK 32, Pk33, PK34, PK35 and Pk36 while Election Commission intact the both NA seats in the new name of NA 18 & NA 19 but reduced PKs seats from total six to five in District Swabi in the new name as PK 43, PK44, PK45, PK46 & PK47. UC Ismaila has been proposed to be included in PK 46 in the preliminary draft / report of delimitation.

4- That feeling aggrieved of the report / draft of the ECP, the petitioner submits that UC Ismaila may be included in PK 47 instead of PK 46 on the followings grounds among others:

Grounds:

(2) 

A-That UC Ismaila consist of 3 Mozas of patwar Circle Ismaila ie Ismaila South, Nazar and Ismaila North of Razzar North, is situated in Tehsil Razzar, and was part of PK 26 Swabi III, then part of PK 33 Swabi III and now proposed in preliminary report of delimitation of the commission to be include in PK 46 Swabi IV. Here it is pertinent to note the whole PK 47 is comprises of the mozas and UCs of Razzar North except UC Ismaila while strange enough that UC Tarakai Comprise of Mozas Tarakai, Shaheeda and Managai falls in Razzar South has proposed to be included in PK 47 while proposal is completely illogical with respect to the principle of delimitation.( copy of the map with respect to the proposed delimitation report of the in respect of District Swabi is attached as annexure B and copy of the information letter No 134 dated 29-01-2018 of the worthy Deputy Commissioner District Swabi addressed to the District election commissioner pertaining full detail of Tehsils, MCs/TCs/Kanungo halkas, patwar circles and Mozas of District Swabi is attached as annexure C).

B-That UC Ismaila is adjacent to UC Adina laying in Shumali Razzar of Tehsil Razzar.

C-That UC Ismaila is laying on the main Swabi Mardan road having easy access for the inhabitants of the UC towards UCs Adina, Kalu Khan/ KSK, Turlandi. Check Nodeh etc Proposed in PK 47 Swabi V while proposed PK 46 is far at a distance and also not convenient in approach to the inhabitants of UC Ismaila.

D-That people / inhabitants falls and proposed to be included in PK 46 are very good, kind, affectionate and unselfish server but as the inhabitants of UC Ismaila has much relationships and interactions with the inhabitants of those villages and UCs proposed to be included in PK 47, hence peoples of Ismaila want and are highly interested to be the part of PK 47 instead of any other PK.

E- That inclusion of UC Ismaila in PK 46 instead of PK 47 is against the principles of delimitation with respect to the distribution of population in geographical compact areas, physical features, existing boundaries of administrative unit, facilities of communication and public convenience etc rather UC Tarakai proposed to be included in PK 47 in the report is full filling the principles for inclusion in PK 46 instead of PK 47.

(3)

F-That UCs Kalu khan, Adina and Ismaila remain intact for LG / BD election constituency, PF, PK & NA constituency which close interaction has formed strong unity in the inhabitants of all the three Ucs and now UCs Adina and Kalu Khan are proposed to be included in Pk 47 while near neighbor UC Ismaila is proposed to be included in PK 46 which proposal is against the wishes and consent of the inhabitants of UC Ismaila.

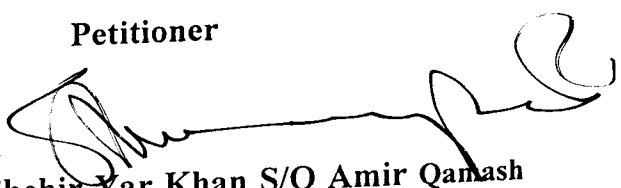
G- That the proposed delimitation report is not in the interest of the voters and inhabitants of UC Ismaila and amendment for the correction is very much compulsory.

H- That any other ground not specifically raised will be argued at the time of arguments / hearing with the permission of the Honourable Commission.

It is humbly prayed that on acceptance of this representation / objection petition, the impugned draft / report of delimitation be amended and UC Ismaila of District Swabi be included in PK 47 and to fulfill the requirement of the distribution of population, UC Tarakai be included in PK 46 instead of PK 47. Any other relief this honourable commission deem fit may extended in favoure of the petitioner.

Note; any other record/ documents will be provided to the commission if required

Petitioner

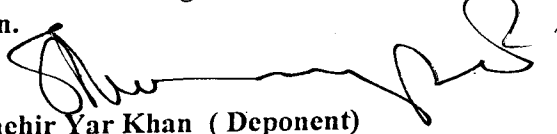
  
Shehir Yar Khan S/O Amir Qamash  
khan Of Village Ismaila Tehsil  
Razzar District Swabi CNIC NO  
16202-0975779-1  
Mob No 03459357787  
& 03153153549


Block Code

065011009

Affidavit

I Shehir Yar Khan S/O Amir Qamash Khan Village Ismaila Tehsil Razzar District Swabi do here by solemnly affirm and declare that the contents of the representation petition are correct and nothing has been concealed or kept secret from the honourable commission.

  
Shehir Yar Khan (Deponent)  
CNIC No 16202-0975779-1

  
WASIH KHAN ADVOCATE  
Oath Commissioner  
Judicial Complex Shahmansoor

02/09/2018

(4)  
