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32/03/2018

BEFORE THE ELECTION COMMISSION OF
PAKISTAN ISLAMABAD

REPRESENTATION UNDER SECTION 21(3) OF
ELECTION ACT 2017 AGAINST THE PROPOSED
DELIMITATIONS OF PROVINCIAL CONSTITUENCY
PK-99 DERA ISMAIL KHAN-V.

Prayer: That on acceptance of the representation Patwar circles "(i) Kirri Shamoza, (ii) Fateh Ali, (iii) Jhok Mohana & (iv) Gur Wali" of Qanoongo Halqa Miran Tehsil Prova, Which have been wrongly excluded from PK-98 and included in PK-99 D.I.Khan-V be restored by excluding from PK-99 and be included in PK-98 and Patwar circles "(i) Kotla Habib, (ii) Khutti, (iii) Shero Nau, & (iv) Mapal" of Qanoongo circle Muryali Tehsil D.I.Khan which have been wrongly included in PK-98 Paroa D.I.Khan-IV be excluded from PK-98 and be included in PK-99 with such other relief as may be deemed proper in the circumstances of the case in accordance with principles of delimitation prescribed in section 20 of election Act, 2017.

Respectfully Sheweth:

1. On the basis of censuses 1998 delimitation of the constituency was carried out and provincial constituency 67 was notified which under the present delimitation has become PK-99 D.I.Khan-V.

2. The present PK-99 D.I.Khan for the election 2002, 2008 and 2013 administratively comprised upon present tehsils Kulachi and Daraban Kalan of District D.I.Khan.
3. Upon establishing Paroa as tehsil the Patwar circle Kirri Shamozaï, Fateh Ali, Jhok Mohana & Gur Wali administratively has been attached with it. But in the present delimitation the area has been excluded from PK-98 Paroa and included in PK-99. Since the said area is administratively and revenue wise attached with Paroa therefore its inclusion in PK-99 is illogical & unjustified.
4. More importantly the said Patwar circles of Kirri Shamozaï, Fateh Ali, Jhok Mohana & Gur Wali have no road connection with Daraban Kalan. The candidates while coming to these circles will have to travel via D.I.Khan-Paroa-Ramak and Gurwali-Kirri shamozaï by covering the one side distance of about 170 KM. Furthermore, in between Daraban Kalan and Kirri Shamozaï etc there passes three main drains i.e. Walheri, Gajistan and Buzdar. Since there is no road and bridge over these drains and the elections are expected during the forthcoming flood seasons therefore it would be very much difficult for the candidates to remain in touch with the dwellers of the said four Patwar circles. Taking account of non availability of road connection with Daraban Kalan this area has been administratively included in Tehsil Paroa PK-98 but now its exclusion from PK-98 and inclusion in PK-99 is beyond apprehension.

9/10/2013

5. Similarly the inclusion of Patwar Halqas Kotla Habib, Khutti, Shero Nau & Mapal of Qanoongo circle Muryali in PK-98 is also absolutely illogical because the area is adjacent to PK-99 and another part of tehsil D.I.Khan has already been included in PK-99. Therefore this area needs to be included in PK-99 and excluded from PK-98.
6. Four Patwar Halqa i.e. Kotla Habib, Khutti, Shero Nau & Mapal may kindly be excluded from PK-98 and included in PK-99 for being adjacent to the boundary of PK-99 and close to its tehsil head quarter with better road facility.
7. Moreover, including Patwar Halqa Kirri Shamoza, Fateh Ali, Jhok Mohana & Gur Wali of tehsil Paroa will mean that constituency PK-99 is expanded to the parts of two other different Tehsils i.e. Paroa and D.I.Khan whereas it can be managed out of only one Tehsil D.I.Khan because Qanoongo Halqa Chehkan of D.I.Khan has already been included in PK-99.
8. It is beyond apprehension that one part of area is excluded from Tehsil Paroa and on the other side a part of area from another Tehsil, D.I.Khan is included in it. Since the inhabitants of PK-99 have common social norms, common dialect and common roads with the dwellers of Qanoongo Halqa Muryali therefore this may kindly be included in PK-99 and excluded from PK-98. Whereas the Patwar Halqa Kirri Shamoza, Fateh Ali, Jhok Mohana & Gur Wali of Tehsil Paroa having least commonalities with the PK-99 may kindly be excluded

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from it and included in PK-98 as replacement of Halqa Muryali.

9. That map of the constituency which has been notified by the Election Commission is enclosed with this representation.

The above proposal is shown by yellow color as PK-99.

M/30/03/218


Petitioner

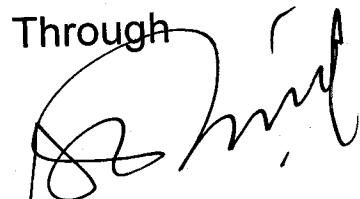
(Fateh Ullah Khan Miankhel son of
Atta Ullah Khan Miankhel r/o
Miankhel House near Bisakhi
Ground District D.I.Khan)


Block = 058010102

S.No: 96

Teh: Daxaban Kalan
District D.I.Khan
Dated. 27/03/2018

Through

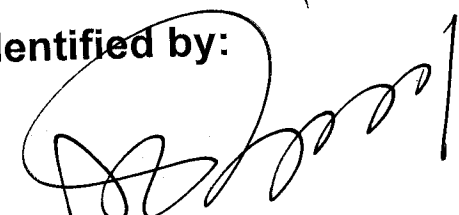

(Abdur Rashid Khan)
Advocate Supreme Court


(Umer Farooq Khan Miankhel)
Advocate High Court

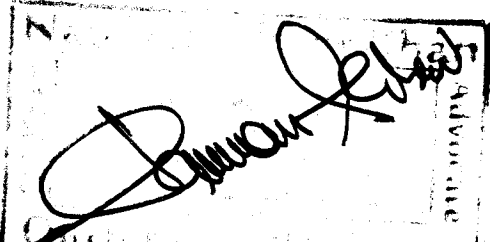
AFFIDAVIT:

I, Fateh Ullah Khan Miankhel Son of Atta Ullah Khan Miankhel r/o Miankhel House near Bisakhi Ground District D.I.Khan do hereby solemnly declare and affirm on oath that the contests of the above representation are true and correct to the best of my knowledge and belief and nothing has been kept secret.

Identified by:


(Abdur Rashid Khan)
Advocate Supreme Court


Deponent


Advocate
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