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BEFORE ELECTION COMMISSION OF PAKISTAN
ISLAMABAD

Objection Petition No. _____-A/2018

1. Jamil Akhtar Tanoli son of Ali Afsar Khan, resident of Village Barkot Halqa Patwar Pind Kargo Khan, Halqa Sherwan, Tehsil Lower Tanawal District Abbottabad. Code . 022010203
SNo. 122 FK. Khan.
2. Abdul Razzaq Khan son of Karimdad, resident of Mohallah Tomolian Gujrat Village Havelian, Theil Havelian, District Abbottabad. Code . 024010103 SNo. 12 Havelian

...PETITIONERS

VERSUS

1. Election Commission of Pakistan through Secretary Election Commission Islamabad.
2. De-limitation Committee Islamabad.
3. Provincial Election Commissioner Khyber Pakhtunkhwa, Peshawar.

...RESPONDENTS

REPRESENTATION/ OBJECTION TO THE
DRAFT PROPOSAL IN RESPECT OF NA-15 &
NA-16 DISTRICT ABBOTTABAD 1 & 2.

PRAYER: ON ACCEPTANCE OF INSTANT
REPRESENTATION DRAFT PROPOSAL IN

RESPECT OF NA-15 & NA-16 ABBOTTABAD
MAY KINDLY BE MODIFIED/SET ASIDE
AND CONSTITUENCY NA-15 AND NA-16
MAY KINDLY BE NOTIFIED AS PER
PROPOSAL BY THE PETITIONERS
ACCORDING TO LAW.

Respectfully Sheweth:-

Facts giving rise to the titled petition are as under;-

1. That petitioner No.1 is a voter in proposed NA-16 in Patwar Circle Pind Kargo Khan Circle Sherwan, whereas, petitioner No.2 is a voter in Canttt. Area village Havelian District Abbottabad.
2. That previously before delimitation of the constituency Abbottabad 1 & Abbottabad 2 were NA-17 & NA-18. Map showing the previous constituency is attached as Annexure "A".
3. That there is no increase or decrease in the National Assemblies Seats.

(3)

4. That according to recent report total population of Abbottabad district is 13,23,912, previous NA-17 & NA-18 constituencies which were having Geographically, compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors were well according to rules and were in the public interest.

5. That peoples of the locality were also having no objection whatsoever, and there was no need to disturb the previous delimitation, only variation in the population of the constituency can be met by slight modification by joining two Patwar Circles from one constituency to another, proposed constituencies of NA-15 and NA-16 i.e. Abbottabad-I & II are annexed as Annexure "B", while site plan showing preliminary report and list of constituencies specifying the area included in each constituency is annexed as Annexure "C" & "D".

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6. That proposed delimitation of the constituencies NA-15 & NA-16 may kindly be modified inter-alia on the following grounds;-

GROUNDS;-

- a) That preliminary report of constituencies NA-15 & NA-16 is not according to rules and law laid down by the apex court of the countries from time to time.
- b) That preliminary report is not based on facts on grounds.
- c) That previous constituency is based on geographically compact block physical features and there are communication facilities in between the areas, and there is also public convenience cognate factors and homogeneity in the constituencies which is lacking in the preliminary

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report of newly proposed
constituencies.

- d) That proposed constituency NA-15 is totally based on rural area having no education facilities and roads.
- e) That respondent committee has not adopted the uniform policy while making delimitation in the different districts i.e. in District Mansehra no such formula was adopted and similarly in most of the constituencies in the Punjab Province, similarly placed districts were not bifurcated in the similar manner.
- f) That there is no increase and decrease in the constituencies of NA in District Abbottabad, therefore, there was no legal requirement to make delimitation of whole District, except the minor modification to meet the population difference according to law.

PRAYER;-

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In the circumstances what has been submitted above and points to be raised at Bar on acceptance of instant representation/objections preliminary report/notification may kindly be set aside and final notification of NA-15, NA-16 constituencies of District Abbottabad may kindly be made according to the proposal appended with the instant petition as annexure "B" any other modification/alternation which this Honourable Commission deems fit and proper may also be made.


JAMIL AKHTAR TANOLI

S/o Ali Afsar Khan
Cell No.0333-9093339

CNIC# 13/01-851697-7


ABDUL RAZZAQ KHAN

S/o Karimdad
Cell No.0306-5501834

...PETITIONERS/OBJECTORS

Through

CNIC# 13/01-3973726-5

Dated: 29/3 /2018


(HAJI SABIR HUSSAIN TANOLI)

Advocate Supreme Court of Pakistan,
Abbottabad

VERIFICATION;-

It is verified on oath that the contents of foregoing revision petition are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


...PETITIONERS/OBJECTORS