

P-①
lar
4.4.20

**BEFORE THE ELECTION COMMISSION
OF PAKISTAN THROUGH SECRETARY**

**MEMORANDUM OF REPRESENTATION/
OBJECTION PETITION UNDER
SECTION 21(3) OF THE ELECTION
ACT, 2017 READ WITH RULE 11 AND
12 OF THE ELECTION RULES, 2017
AGAINST THE PROPOSED DELIMITATION
OF NA-13 (PREVIOUS NA-20).**

Respectfully Sheweth!

1. That, the petitioner is a permanent resident of Village Potha union council Behali, Tehsil and District Mansehra and also registered voter of formerly NA-20 and now NA-13 and is aggrieved due to exclusion of village Potha and Ogra from NA-13 formerly NA-20 and by including the same in NA-14 formerly NA-21.

(Copy of the voter list alongwith proposed notification are annexed as annexure "A&B").

2. That, the petitioner is residing in village Potha from his forefathers and is also hailing from social family of Tehsil Mansehra.

3. That, before proposed delimitation, Villages Ogra and Potha were the part and parcel of NA-13 formerly NA-20 but due to new census of 2017, both the above said two villages separated from NA-13 formerly NA-20 and were added in NA-14 formerly NA-21 without any legal and valid reason/justification and the said inclusion of above said two villages in NA-14 formerly NA-21 is against the wills of the people of the above said villages and is a clear cut discrimination and heavy loss to the peoples of the above-mentioned villages.

(Copy of the map alongwith Google map are annexed as annexure "C").

4. That, it is pertinent to mention here that no other change has been carried out except the inclusion of two villages i.e. Potha and Ogra in NA-14. Our villages are situated at 02 Kilometers from Mansehra city similarly, out both the villages are totally dependent on Mansehra city i.e. for Judiciary, Tehsil Administration (Assistant Commissioner, Tehsildar,

Girdawar etc.) Tehsil Municipal administration, Education, Health, Business, markets, all day to day affairs are linked with NA-13 formerly NA-20.

5. That, it is also astonishing to note that the limit of population for constituencies is 7,82,000 whereas bare perusal of the list of constituencies shows the population of NA-13 as 8,97,000 whereas the population of NA-14 comes to 8,30,000 after including the villages Ogra and Potha in NA-14. If the population of Ogra and Potha are excluded from NA-14 then there is 40,000 extra population which fulfills the basic criteria for delimitation.

(Copy of the extract from census report alongwith lists of Mouzas are annexure as annexure "D&E").

6. That, the Patwar Circle Potha as well as the office of Qanungo have been divided into two parts, one part has been included in NA-14 whereas the other part has been retained in NA-13 which is not in accordance with law,

P-④



rules and regulations so framed for delimitation.

7. That, Patwar Circle Potha including villages Potha and Ogra are directly linked through metalled road with Mansehra city and the distance is only 02 Kilometers taking 15 to 20 minutes and all the basic necessities of life of villages Potha and Ogra are to be fulfilled from Headquarter of NA-13 i.e. Mansehra City. Similarly, the distance between Tanawal and our villages is more than hundred Kilometer taking 3 to 4 hours and if a voter has to go to Headquarter NA-14 from village Potha then most of his time would be consumed in his/her journey from Potha to Headquarter of NA-14 and the same would cause great mental and physical torture and agonies for the voters of village Potha and Ogra. Furthermore, traveling at such a far flung area is also not out of danger for the residents of village Potha and Ogra as Tanawal area is famous for their inimical terms with each other.
8. That, similarly, village Potha and Ogra as well as area of NA-14 have clear cut difference in culture, way of life and are having no similarity with each other.

P-5



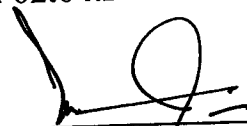
9. That, this Honourable commission can appoint commission for spot inspection of the geographical location and other factors of the village Orga and Potha as well as Tanawal areas.

.....PRAYER

That in the light of above facts and grounds it is suggested that keeping in view the above mentioned facts and circumstances as well as keeping in view the future prospects, the Patwar Circle Potha i.e. villages Ogra and Potha may please be retained in NA-13 instead of NA-14 Tanawal area.

(Copy of proposed delimitation/map is annexed as annexure "F").

Dated 02.04.2018



JAMEEL AHMED AWAN
Son of Muhammad Raza
Resident of Awan House Potha,
Tehsil and District Mansehra.
Voter No.1073

Block Code No.017040501

NIC No.13503-0570726-5

IN PERSON

CONTACT: 0300-5622400

0321-5622400

0334-5622400

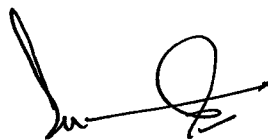
✉ #mail# mobi3636@gmail.com.

P-6 ✓

AFFIDAVIT.

I, Jameel Ahmed Awan son of Muhammad Raza Resident of Awan House Potha, Tehsil and District Mansehra, petitioner, do hereby solemnly affirm and declare on oath that the contents of the foregoing memorandum of objection are true and correct and nothing has been concealed from this Honourable Commission.

Dated 02.04.2018



Jameel Ahmed Awan
(DEPONENT)

