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BEFORE ELECTION COMMISSION OF
PAKISTAN

REPRESENTATION / OBJECTIONS UNDER
SECTION 21 (2) (3) OF ELECTION ACT 2017 AND
ELECTION RULES AGAINST THE RECENT
REDESIGNATION OF FORMER NATIONAL
ASSEMBLY AND PROVINCIAL ASSEMBLY
CONSTITUENCIES OF DISTRICT
ABBOTTABAD.

Respectfully Sheweth:

Brief facts giving rise to the instant
representation are arrayed as under:-

FACTS: -

1. That the undersigned persons are the registered voters of NA-17 District Abbottabad. (Copy of current voter list alongwith certificate from local election commission office are attached as annexure "A-1 to A-3").
2. That inception, the recently proposed consequences of NA-15 and 16 were ear marked as NA-11 and 12 back in year

1970. After delimitation in the year 2001 NA 11 and 12 were redesignated as NA-17 and 18 and were identified as such until the recent proposals of the delimitation of constituencies by this worthy commission.

3. That be it so, right from 1970 to date which is well nigh over four decades period of time, despite two delimitations having been conducted in the past were restricted only to the extend of balancing ratio of population on the preferial boundries dividing the two constutencies, without however attempting massive and topsy-turvy delimitation changing the entire complexion and creating a situation of complete chaos and confusion amongst the voter of both the constituencies.

That we the registered votes of NA-17 having therefore come to this honourable forum with the instant representation in hand seeking a reversal of the proposed

delimitation plan on the following, inter-alia amongst many other:

GROUND:

- a. That the proposed delimitation by redesignating NA-17 & 18 as NA-15 and 16 is totally against the GEO Physical, social and linguistic divides prevailing since the times immemorial. There was hardly any need for bringing a massive change devising two altogether different, unnatural and illogical maps, without taking into consideration the erstwhile divide, only for the sake of balancing the ratio of population.
- b. That the basic objective for election in the democratic states is social formulation, strengthening unity and harmony of society based upon the principle of fair, honest and equal opportunity.
- c. That perusal of the proposed maps would show that these have been made / carved by a team who has been totally ignorant



of the electoral requirement and convenience of the voters. They totally ignored the fundamental principles of delimitation which are also enumerated in the election Act 2017 i.e geographical compact areas, physical features, facilities of communication, public convenience, relations and social harmony.

- d. That the proposed delimitation amounts to uprooting of already settled constituencies from the last many year which is not only against the constitution but also against the election laws.
- e. That after the recent census proposed changes in the constituencies were necessary where the number of seats increases or decreases in the national assembly or provincial assembly but in Abbottabad District the number of seats for national assembly remain the same and the already historic developed constituencies since 1985 developed natural harmony among the different tribes, social status irrespective of caste etc.



f. The proposed delimitation will totally damage the developed harmony which could result in failure of political system wisdom demand that the national assembly constituencies should not be disturbed.

g. That under the new scheme of delimitation, strangers to each other have been uniformed alike in this regard and without consideration of natural placing of different communities of the two distinct constituencies.

Therefore proposed the following amicable delimitation of two constituencies as follows:

i. That the proposed delimitation has been made to equate the balance of population between the two constituencies as according to the recent census population of NA-17 stood at almost 707940 and population of NA-18 stood at almost

624972, resolution to such imbalance in the population has been proposed through massive redesignation of inclusion and exclusion of huge areas inter see, without having regard to adverse effect on the different social fibers of these constituencies therefore, we proposed that:

1. The constituencies be delimited by detaching the following U/Cs / Patwar Circle of NA-17 which are adjacent to NA-18 (proposed NA-15 & 16).
 - a. Chattri
 - b. Salhad
 - c. Baldhari or any other adjacent patwar circle.

2. That on record the population of these patwar circles will create a balance between the two already developed constituencies (NA-17 & NA-18), the balance of population will be equated in an ideal manner as the population of



NA-16 is will reduce and
population of NA-15 will increase.

(Copies of census of year 2017
alongwith proposed maps are
attached as annexure "B & C")
respectively.

3. It shall further be seen the
delimitation of the areas suggested
by us do not house any significant
administrative units, thus would
not cast any bearing of the
performances or will not cause to
disturb the administrative structure
of these constituencies.

4. That the foremost importance is
enjoyed by the factor of convence
of the voters. As stated above, the
voters of these constituencies have
been totally redesignated the
constituencies in the proposed
fashion will result into complete
devastation of the administrative



planning for the incoming General Election.

5. That as one seat for provincial assembly is decreased for district Abbottabad, so adopting the same proposal the seats for provincial assembly can be adjusted / reallocated.
6. That a very small chunk of area, if put in delimitation, would serve the purpose of the commission and the objective will be achieved without getting into hassle or unwarranted jigsaw-puzzles for the voters & the staff of the commission and the administration, all. (Copy of mark map is attached as Annexure "D").
7. That the other practical proposals shall be argued / discussed at the time of hearing.

PRAYER:

It is therefore, requested that the above proposals being natural amicable and probably acceptable to the voters of both the constituencies may kindly be accepted & the maps of constituencies of District Abbottabad be amended accordingly.

Dated: 03-04-2018

..... Petitioner / Objector

Through

(1). **Muhammad Nadir Khan** S/o Muhammad Siddique R/o Kunj Jadeed, Abbottabad present Ali House Opposite Govt; Girls Primary School Karimpura, Abbottabad. (Cell No. 0344-9496497)

(2). **Sardar Fida Muhammad Khan** S/o Sardar Muhammad Sarfraz Khan R/o Village Malkot TEhsil & District Abbottabad. (Cell No. 0300-5102637)

(3). **Jehangir Khan** S/o Muhammad Irfan R/o Aziz Bhatti Road, Habibullah Colony, Abbottabad. (Cell No. 0300-5624458)