

**BEFORE THE ELECTION COMMISSION OF PAKISTAN,**  
**THROUGH SECRETARY ELECTION COMMISSION OF**  
**PAKISTAN, ISLAMABAD.**

13/07/2018

- 1) Abdullah Khan Tanoli S/o Khanizman Khan R/o Sherwan Kalan Post office  
Sherwan Tehsil and District Abbottabad.

**V E R S U S**

- 1) Delimitation Committee, Election Commission of Pakistan, Islamabad,  
Shahraye Dastoor, G-5/2, Islamabad.
- 2) Election Commission of Khyber Pakhtunkhwa Election Commission office  
KPK Peshawar.
- 3) District Election Office, Election Commission of Pakistan, Fawara Chowk,  
Abbottabad.
- 4) Election Commission of Pakistan through Secretary Election Office,  
Secretariat, Shahraye Dastoor, G-5/2, Islamabad.

**SUBJECT: DELIMITATION OF CONSTITUENCIES IN DISTRICT**  
**ABBOTTABAD.**

**RESPECTFULLY SUBMITTED:**

*The Objections In Following Memorandum:-*

1. In pursuant to the 2017 census, preliminarily report for  
constituencies of NA and Provincial Assemblies, the  
delimitation committee created two national  
constituencies for district Abbottabad as NA-15  
Abbottabad-I and NA-16 Abbottabad-II. As per census  
report the population of District Abbottabad is

13,32,912/-. NA-15 (5,99,132/-) which is Abbottabad-I and NA-17 Abbottabad-II is (7,33,789/-).

30/03/2018

This position of Abbottabad-I and Abbottabad-II is continued since 1997 but about 9% changes were made after 25 years in delimitation of 2002 whereby circle Sherwan was shifted from Abbottabad-I to Abbottabad-II for balancing the population of both the constituencies in accordance with the census of 1998. The Election 2002, 2008 and 2013 were held as per delimitation of 2002 and in this regard political consensus was also established. Keeping in view of easy communication, facilities and comfort of voters and proper bifurcation of tribes which have been accepted by the (Baradrarries) of the area with the mind set over the years.

2. That the shifting of circle Sherwan from the previous constituency belt has created unrest situation amongst the public while formulating the delimitation of the constituencies of National and Provincial Assemblies the principle laid down in Section 20 of the Act seems to be not followed in its true spirit as the distribution of population in Geographically compact areas, existing boundaries of administrative units etc to ensure homogeneity.

JA 30/07/2018

3. That previously NA-18 Abbottabad-II which have been bifurcated, the Sherwan QH of Tehsil Abbottabad and of which lower Tanawal Tehsil (Consisting of Khotiala, Jarral, Sherwan and Pind Kargu Khan) shifted to NA-16 which does not find and tally the north clock wise procedure of delimitation being contrary to section 20 of Election Act 2017, while rules does not follows the Act.
4. The marked Naqsha of Election Office also does not show figure of the compass indicators which could ascertain clock wise delimitation. National Assembly and Provincial Assembly should have been of the same formula while balance of population formula as applied in the district Mansehra has not been adopted in the district Abbottabad.
5. That some of the part of langra divided and has been included in two constituencies that is Abbottabad-I and Abbottabad-II while Havelian MC and Cantt of Havelian is included in NA-16 Abbottabad-II due to which there geographical compact block affected and other principles of delimitation too.
6. That the Tarnawai and Bandi Dhundan being part and parcel of the Orash (QH) as these two Patwar circles (PC) have no nexus with NA-15 Abbottabad-I both on

geographically compact block and administratively unit-wise these are conveniently absorbed to NA-16 Abbottabad-II, which follows administrative and boundaries facilities, while previously these were included in NA-17 Abbottabad-I.

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7. That Abbottabad MC in the previous NA-17 Abbottabad-I which as per census 2017 bears population of 70,180 of MC Abbottabad has not been explicitly mentioned in either NA-15 Abbottabad-I and NA-16 Abbottabad-II, however, this population is adjusted and mentioned in PK-39 Abbottabad<sup>IV</sup> which depicts that the population of Abbottabad MC has been deprived of their rights of vote in National Assembly.
8. Bakot (QH) was previously in NA-17 Abbottabad-I and now mentioned in NA-15 Abbottabad-I which does not have administratively and boundaries connection which is against the principles of delimitation scheme. This has given drastically expanded distances of their communication, facilities and convenience. That Bakot and Orash are to be in one compact block and can easily be reshaped in the same block.
9. That the population proposal and adjustment in the NA-15 Abbottabad-I and NA16 Abbottabad-II with total

number of population is attached for convenience which is proper and in accordance with the principles of delimitation.

*M 28/03/2018*

*Qasim*

...PETITIONER

Abdullah Khan Tanoli S/o Khanizman Khan R/o Sherwan Kalan Post office Sherwan Tehsil and District Abbottabad.  
Cell No.0300-9119070, CNIC No.13101-9295728-7

*Being voter in the constituency*

*Through counsel:*

Dated: 28/03/2018

*Attorney*  
(MUHAMMAD TARIQ KHAN TANOLI)

Advocate Supreme Court of Pakistan,  
Abbottabad

*Raza Shah*  
(RAZA SHAH)

Advocate High Court Abbottabad,

**VERIFICATION:-**

*Verified that the contents of the instant Objection Petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.*

Dated:- 28/03/2018

*Qasim*

...PETITIONER

ADDRESS & CONTACT NO.:

ABDULLA KHAN TANOLI ADVOCATE C/O MOHAMMAD TARIQ KHAN TANOLI ADVOCATE SUP COURT OFFICE NO. 27- Sherpao plaza DIST COURT, ABBOTTABAD : CELL NO. 0322-9936286  
0300-9119070