

**The Secretary Election Commission of
Pakistan, Islamabad.**

**Subject: Restoration of Two National Assembly Constituencies in
Kurram Agency.**

1. According, to the notification issued by the Election Commission of Pakistan, the National Assembly Constituencies in Kurram Agency have been reduced from two to one which is an unwarranted and unjust decision.
2. Section 20 of the Election Act 2017 clearly states the following pre-requisites for forming a constituency.
 - a. Population
 - b. Geographic location and boundaries
 - c. Communication system
 - d. Government administrative setup
 - e. Local and religious setup.
3. Constituencies have been formed based on the population count of 2017 census. Other pre-requisites mentioned in Para 2 have not been taken into account.
4. Census of 2017 does not give correct population of Kurram Agency as explained in the statement provided by the FATA Disaster Management Authority attached at F/A. 33024 families were displaced from the ~~displaced~~ villages of Kurram Agency. Some details are attached at F/B,F/C,F/D.
5. As per para b of the annexed report at F/A, it has been mentioned that there are 14514 displaced families which are not verified/unregistered. These are families who have left their homes on their own and are living in different cities in K.P.K and Islamabad. Their votes are registered in Kurram Agency but were counted at their present residences during 2017 census.

6. Moreover last Para of report at F/A states that out of total displaced families only 16288 families have been paid Return Cash Grant (RCG) and Transport Cash Grant (TCG). Which implies that rest of the 16736 displaced families' still need repatriation and are also not counted in Parachinar in 2017 census.
7. Fact is that none of the 33024 displaced families have gone back to rebuild and live in their houses and are still displaced.
8. All the displaced persons, 33024 registered, and 14514 unregistered mentioned in the FDMA report have not been counted as resident of Kurram in 2017 census where as their votes are registered in Kurram Agency.
9. If we consider each displaced family consisting of ten members, the total population of Kurram comes to (619553+475380) 1094933.
10. Constituencies N.A 37 and N.A 38 in Kurram Agency were created in year 2000. So far three elections have been held in these constituencies. This divide of Kurram in two constituencies was based on the calculations according to the Election Act 2017, even before this Act was passed. Keeping in view the geography, religious divide and all other considerations there is a dire need for two separate constituencies in Kurram Agency.
11. Kurram Agency is inhabited by the Shias and Sunnis who have always remained daggers drawn. There have been many sectarian clashes, and these clashes had become a routine. It was only after the creation of two constituencies that these disputes were controlled. There have been no sectarian clashes in Kurram Agency after the creation of two National Assembly constituencies.

12. If only one National Assembly Constituency is given to Kurram Agency there is an imminent danger of sectarian clashes during the coming elections.

13. Central Kurram which is part of N.A 38 is lagging behind in development, will further suffer due to the political and religious divide.

In view of the above submissions, it is prayed that decision of one constituency for Kurram Agency may please be revisited and previous two constituencies be restored.

Petitioner

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