

IN THE ELECTION COMMISSION OF PAKISTAN

Representation No. ____/2018

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31/1/18

SUBJECT:- REPRESENTATION CUM OBJECTIONS IN TERMS OF SECTION 21 OF THE ELECTIONS ACT, 2017 R/W RULE 12 OF ELECTION RULES, 2017 FURTHER R/W ARTICLE 218 (3) OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.

The applicant most respectfully submits as under:-

1. That the applicant is a registered voter of 084030803 / vote No 177, Kurram Agency, Tribal Area-VII now part of NA-46, as such, interested in democratic norms, election in the country, particularly in the delimitation of his own constituency, hence has a right to make representation and raise a voice against incorrect delimitation process.
2. That the above constituency is part of Federally Administered Tribal Area, to National Assembly twelve general seats have been allocated to it in the forthcoming elections,.
3. That the constituencies of National Assembly in Federally Administered Tribal Areas are based on some data which has recently been notified by this Commission, detail whereof is given below:-

Ser	NA	Constituency	Population
1.	40	Bajur Agency-I, Tribal Area-I	360651
2.	41	Bajur Agency-II, Tribal Area-II	369501
3.	42	Bajur Agency-II, Tribal Area-III	363532
4.	43	Mohmand Agency, Tribal Area-IV	466984
5.	44	Khyber Agency-I, Tribal Area-V	516103
6.	45	Khyber Agency-II, Tribal Area-VI	470870
7.	46	Kurram Agency, Tribal Area-VII	619553
8.	47	Orakzai Agency, Tribal Area-VII	254356

9.	48	North Waziristan Agency, Tribal Area-IX	543354
10.	49	South Waziristan, Agency-I, Tribal Area-X	321077
11.	50	South Waziristan-II, Tribal Area-XI	352988
12.	51	FR, Tribal Area-XII	357687

4. That reason to reproduce the details of para No.3 in this representation is to highlight many things unnatural, i.e. areas, population etc of some constituencies which are apparent on the face of record.

5. That needless to mention here that the constituency in question is a disturb area due to atleast two set of terrorism i.e. because of "Taliban" and "Sectarianism" hence a major partition of its population has already been migrated and not settled back as yet, previously this area was consisting upon NA-37 and NA-38 and at that time its population was shown as 498310 but now it is shown as 619553 which is unnatural in Pashtoon tribal set up actually because of disturbance the people have temporarily been shifted or not available, as such, by showing less population as seat to this area has been reduced.

6. That when one just have a look over the population table mentioned in para No.3 above we find that still highest population has been shown in the constituency in question i.e. 619553 with one seat but two seats were given to the constituencies where there is almost half population has been shown i.e. NA-47 and NA-49, not only this in

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most of the constituencies of FATA seats in NA are created where a little bit above the half population is residing which is strange.

7. That there must be a cogent reason to abolish a seat which historically is situated, here there were two national Assembly seats in the past i.e. NA-37 & NA-38, abolition or merger must have some strong grounds but without any the seat has been made one i.e. NA-46.

8. That still there is no harmony in population, two main sects are residing here and even people cant go in the area of other sects, as such, the officers have chosen different days in the week to sit in different areas.

9. That in the circumstances, the petitioner being a registered voter of NA in question is aggrieved/ interested to correct the wrong made in preliminary delimitation to file this representation cum objection on the following amongst other grounds:-

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- A. That till now the final census report has not been published, as such, the whole exercise appears to be premature, even otherwise the population is displaced because of terrorism.
- B. That there are no similarities while making the constituencies in respect of areas and population, hence on this count too it is bad.
- C. That the maps of the constituencies prepared by this Commission have been supplied late besides are incorrect and do not tally with the maps of

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Survey department even it is not in consonance of Goggle maps, hence the commission may look into.

- D. That the criteria meant in the Election Act, 2017 and the rules have been ignored resulting miscarriage of justice.
- F. That it is not known that why a seat has been reduced of the area as previously these were two, specially when the population of this agency is almost double.
- G. That it has also not been considered that people (Sunnies & Shias) cannot go in the areas of others, therefore, the Government officials hold their offices separately for these two sects of population in different days of week, so now there be a one representative.
- H. That according to the census of 1998, the population of Kurram Agency was 498310 in result whereof out of twelve seats, Kurram agency was given two seats of National Assembly, now according to the census of 2017, the population of Kurram Agency has been shown to 619553, but the seats of National Assembly of Kurram Agency have been decreased to one, while in the FATA the same twelve seats are maintained, which is not understandable.

J. That in the census of 2017, the population of FATA has been shown to be enhanced from 33 Lacks to 50 Lacks which is based on totally wrong facts as it is unnatural in Pashtoon tribal setup, hence not acceptable.

K. That the people of Kurram Agency has suffered a lot in the operations being carried out in their area, they have been displaced from their homes, the business and houses of the people are eliminated, as such, played great role in the anti terrorism activities, but they have been gifted by reducing a seat of National Assembly, which is highly uncalled for.

L. That reasons to make the constituency would be the harmony between the local population and their convenience which principle has been violated while notifying the preliminary constituencies, hence required to be corrected.

It is, therefore, respectfully prayed that preliminary delimitation may be revised, two seats of National Assembly which have previously declared may be maintained in the present delimitation also with any other relief as deem fit and proper in the circumstances of the matter in the interest of justice.

DATED:

APPLICANT

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M. H. Q. A. B.
31/8/18

