

**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 PK-31 MANSEHRA-2.**

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 PK-53 and now PK-32 and is aggrieved due to exclusion of Patwar Circle, Potha of Qanungo Halqa Behali of Tehsil and District Mansehra from PK-31 and by including the same in PK-32 formerly PK-53.

(Copy of proposed notification is annexed as annexure "A").

2. That, the petitioner is a permanent resident of Tehsil and District Mansehra and residing there from

his forefathers and is also hailing from political and social family of Tehsil Mansehra.

3. That, the District Mansehra consists upon Tehsil Mansehra, Tehsil Balakot and Tehsil Oghi, three administrative units separated by natural geographical boundary of mountain range with varying height from 8000 to 12000 Sq.ft. above sea level. All these three administrative units are connected through a narrow gauge road passing the Susal Gali to Tehsil Oghi, Damgala to Tehsil Balakot through MNJ (Mansehra Naran Jalkhad) Road and that prior to proposed delimitation all the three old Tehsils i.e. Mansehra, Oghi and Balakot and their respective administrative boundaries are the limits of their respective constituencies i.e. PK-30, PK-31 and PK-32 formerly PK-53 and PK-54.

4. That, before proposed delimitation, Patwar Circle Garhi Habibullah, Doga, Atter Shisha and Patwar Circle Behali were also part of PK-31 formerly PK-53 but due to new

census of 2017, Patwar Circle Garhi Habibullah, Patwar Circle Doga alongwith Patwar Circle Atter Shisha were separated from PK-31 and were added in PK-30 due to less population of Tehsil Balakot. Similarly, Patwar Circle Potha was also excluded from PK-31 and was added in PK-32. The inclusion of Patwar Circle Potha in PK-32 against the wills of the people of the Patwar Circle Potha is a clear discrimination and heavy loss to the peoples of the above-mentioned Patwar Circle.

5. That, the total population in District Mansehra according to new census is 15,55,460 in numbers and which has been divided into two seats of National Assembly and 05 seats of Provincial Assembly.

(Copy of census report is annexed as annexure "B").

6. That, exclusion of Patwar Circle Potha from PK-31 and inclusion of Patwar Circle Labarkot in PK-31 in the proposed delimitation is without any geographical compactness e.g.

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village potha is situated at a distance of 01 Km from Municipal limits of Mansehra and 02 KM from Mansehra city and thus is a part and parcel of Mansehra city.

(Copy of map of District Mansehra and proposed delimitation are annexed as annexure "C" & "D").

7. That, Patwar Circle Potha is part and parcel of Tehsil Mansehra and very nearer to Mansehra City and peoples of Patwar Circle Potha have their businesses and all other residential activities in Mansehra City whereas by including the Patwar Circle Potha in PK-32 i.e. in different constituency of Tanawal Area, the area of Potha lost its sight and secondly peoples have to travel to mountainous and hilly areas and to cross dangerous areas to reach their polling stations and Tanawal area, which is very difficult for the people of Potha.
8. That, in the proposed delimitation, PK-1 Chitral and PK-35 Torghar have been ignored due to their geographical location, administrative and communication problems.

9. That, this Honourable commission can appoint a local commission for physical inspection of proposed delimitation of constituencies particularly area of Patwar Circle Potha, Gandhian and Labarkot.

10. That, in Patwar Circle of Potha, population amounting to almost 12,000 and Potha which is a part and parcel of Mansehra city have propriety right to be included in PK-31 as the population of above-mentioned Patwar Circle have physical, geographical and cultural compactness and easily accessible through land and is also adjacent to Mansehra city whereas Gandhian Patwar Circle and Labarkot Patwar Circle can easily be excluded from PK-31 and can easily be included in PK-32 so, the population of above-mentioned areas and Patwar Circles can easily cast their votes on nearest polling station and can elect their representatives according to their whims and wishes.


.....PRAYER.....

It is, therefore, most humbly
prayed that on acceptance of the
above-mentioned objections, Patwar
Circle Potha may please be allowed
to be included as part of PK-31
Mansehra-2 instead of PK-32
Mansehra-3.

Dated 31.03.2018

RASHID ALI
Son of Ghulam Sarwar
Resident of village Potha,
Tehsil and District Mansehra.
NIC No.13503-0215564-9

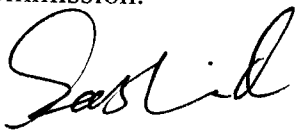
Through


JUNAID ANWAR KHAN,
ABDUL WAHID TANOLI
Advocates High Court,
Mansehra.

AFFIDAVIT.

I, Rashid Ali son of Ghulam Sarwar
resident of village Potha, Tehsil and
District Mansehra, applicant, 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 31.03.2018


Rashid Ali
(DEPONENT)