

**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-34 MANSEHRA-5.**

Respectfully Sheweth!

1. That, the petitioner is permanent resident of village Jalgali, Tehsil and District Mansehra and also registered voter of formerly PK-56 and now PK-34 and is aggrieved due to exclusion of population of Patwar Circle Jalgali, Tehsil and District Mansehra from PK-34 and by including the same in PK-33 formerly PK-56.

*(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

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from political and social family of Tehsil and District Mansehra.

3. That, before proposed delimitation, Patwar Circle Ahal Chinarkot and Battal and Jalgali were part of PK-34 formerly PK-56 but due to new census of 2017, Patwar Circle Jalgali are shown to be part and parcel of PK-34 but their population have wrongly been included in PK-33 and due to this very reason, the peoples of PK-34 have to cast their vote in PK-33 which is a clear discrimination and heavy loss to the people of the above-mentioned Patwar Circle.
4. 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").

5. That, exclusion of population of Patwar Circle Jalgali from PK-34 and inclusion of population of Patwar Circle Jalgali in PK-33 in the

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proposed delimitation is unlawful, fanciful, perverse, arbitrary, based on malafide, against the law, rules and regulations, discriminatory and is liable to be restored to its previous position i.e. population of Jalgali be added in PK-34.

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

6. That, Patwar Circle Jalgali is the part and parcel of PK-34 and the residents of village Jalgali are entitled to cast their vote in PK-34 but the area of Patwar Circle Jalgali was shown in the proposed delimitation as a part and parcel of PK-34 but their population was illegally and without lawful authority was excluded from PK-34 and wrongly included in PK-33 which is against the law, rules and regulations.
7. That, this Honourable Commission can appoint a local commission for physical inspection of proposed delimitation of constituencies particularly

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area of village Jalgali, Tehsil and District Mansehra.

8. That, population of Patwar Circle Jalgali is amounting to almost 8000 which is the part and parcel of PK-34 thus have propriety right to be included in PK-34 as the area of the Patwar Circle Jalgali have been shown to be included in PK-34 but inclusion of the population of the same in PK-33 does not appeal to a prudent mind. Furthermore, keeping view the basic and fundamental rights of the people of locality, the population of Patwar Circle Jalgali is necessary to be included in PK-34 by which the population of above-mentioned area and Patwar Circle 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, Population of Patwar Circle Jalgali may please be allowed to be included in PK-34

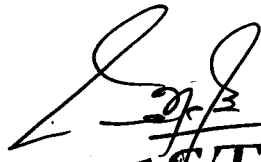
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Mansehra-5 instead of PK-33
Mansehra-4.

Dated 02.04.2018

ABBAS HUSSAIN son of
Sardar Muhammad Hussain
resident of village Jalgali,
Tehsil and District Mansehra.
NIC No.13503-4866743-5
.....Petitioner


Through 
JUNAID ANWAR KHAN,
Advocate High Court,
Mansehra.


ATTESTED
ABIS NAWAZ ADVOCATE
Oath Commissioner
Date: 01/04/18
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High Court Mansehra

AFFIDAVIT.

I, Abbas Hussain son of Sardar Muhammad Hussain resident of village Jalgali, Tehsil and District Mansehra, petitioner, 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 02.04.2018


Abbas Hussain
(DEPONENT)