

The Secretary,
Election Commission of Pakistan,
G-5/2, Constitution Avenue,
Islamabad

April 2, 2018

Subject: **Memorandum of Representation / Objection under section 21 (3) Election Act 2017 Read with rule 11.12 of election rules 2017 to the draft proposal in respect of delimitation of pk-36-37-38 and Pk -39 of District Abbottabad**

The petitioners who are registered voters in the proposed constituency PK-37 district Abbottabad, with due respect submit following representations/objection petition against proposed delimitation of PK-37, Abbottabad-II proposed by ECP. (Copy of proposed delimitation notification attached as Annexure- A).

1. District Abbottabad is spread over 18013 km² area having steep hilly terrain. The population of the district according to the censuses 2017 is about 1.330 million. According to election Act, 2017, Sec-20, Principles of Delimitation, all constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population shall in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.
2. In view of the above laid down principles we hereby submit our legal objections and proposals to preliminary list of Provincial Assembly constituency Pk-36, 37, 38 and Pk-39 District Abbottabad.
 - a. Patwar Circle Chatrri, which constitutes of a total population of 13833 persons have historically remained part of formerly PK-44 now PK-39. The communication of this Patwar Circle originate and culminate in Pk-39, and has no homogeneity or social connectivity with the people of PK -37 to which it has been attach to. The language, culture and social bondage of the people of PC Chatri have always been woven into the social fabric of the people of present PK 39 and not with PK 37 to which it has been wrongly attached.
 - b. Patwar Circles namely Bandi Atai Khan, Garhi Phulgran, Rajoya, and Langra have been deprived of homogeneity by being separated from the same kind of majority population inhabited in the neighboring Patwar Circles namely (i) Kokal, (ii) Havelian PC, and (iii) Jahngnan. Moreover, Patwar Circles Kokal and Langra fall within the same Qanungo Halqa which have been seperated. The population of this area is 143745 (PC Kokal 106645, PC Jhangnan 15818, Havelian PC 21282) but a part and

W Jy

parcel of this population ie. PC Bandi Atai Khan 17533, PC Rajoya 14053, PC Garhi Phulgran 13329 and PC Langra 25746, totaling 70661 has been divided/split from the adjoining majority population defeating the principle of homogeneity of population and seriously compromising their ability to choose the political representatives of their choice and liking.

- c. Present PK-37 constitutes the most treacherous, hazardous, unsafe, mountainous and difficult to approach hilly areas. Moreover, it spread on a vast and biggest geographical expanse with minimal road communication facilities. It would be pertinent to attach some of the plain and easily approachable urban area to PK 37 to somewhat balance the ease of approach as compared to other constituencies.
- d. In the preliminary list of constituencies there has been violation of sub section 1 of section 20 of the election act 2017 by not keeping the existing boundaries intact, which provides to keep the existing boundaries of the existing administrative units intact as far as practicable. The boundaries of administrative units have been divided/split gravely effecting and disturbing the natural homogeneity of population in total disregard of the Principles of Delimitation as laid down in the Election Act 2017.
- e. While creating preliminary list of constituencies, the geographical compact area and public convenience also has not been considered due to which the public will suffer grave hardship.

Without Prejudice to above legal objections, constituency wise proposals are as under:

Proposal

No and Name of Constituency	Extent Of Constituency	Population
Pk-36 Abbottabad-I	Preliminary Delimitation Proposal a. Bakot Qanungo Halqa of Abbottabad tehsil. b. Lora tehsil, and c. The following patwar circlrs of Orash Qanongo halqa of Abbotabad Thesil (i) Tarnawai. (ii) Bandi Dhundan of Abbottabad district.	319368

	<p>Suggestions/ Proposal</p> <p>(i) Add PC Banda Pir Khan of Abbottabad district (+) 12513</p> <p>(ii) Subtract Bandi Dhundan (-) 15251</p> <p>(iii) Subtract PC Sialkot (-) 14141</p> <p>(iv) Subtract PC Ghambir (-) 12942</p>	289547
Pk-37 Abbottabad-II	<p>Preliminary Delimitation Proposal</p> <p>(a) Havelian Qanungo Halqa of Havelian Tehsil, excluding following patwar circles.</p> <p>(i) Kokal</p> <p>(ii) Havelian</p> <p>(iii) Jhangra</p> <p>(b) Baghan Qanungo Halka of Abbottabad Tehsil.</p> <p>(c) Galiyat/Hazara Hills,</p> <p>(d) Census charge No 01 (Murree Galies cantonment, and</p> <p>(e) The following patwar circlrs of Orash Qanungo halqa of Abbotabad Thesil</p> <p>(i) Chatrri</p> <p>(ii) Dahmtorr-I and II,</p> <p>(iii) Nagaki, of Abbottabad district.</p>	330402
	<p>Suggestions/ Proposal</p> <p>(i) Subtract PC Bandi Atai Khan (-) 17533</p> <p>(ii) Subtract PC Rajoya (-) 14053</p> <p>(iii) Subtract PC Garhiphulgran (-) 13329</p> <p>(iv) Subtract PC Langra (-) 25746</p> <p>(v) Add PC Ghambir (+) 12942</p> <p>(vi) Add PC Sialkot (+) 14141</p> <p>(vii) ADD PC Salhad (+) 36018</p> <p>(viii) Subtract PC Chatri (-) 13833</p>	309008
Pk-38 Abbottabad-III	<p>Preliminary Delimitation Proposal</p> <p>(a) Lower Tanawal Tehsile</p> <p>(b) The following patwar circles of Sherwan Qanungo Halka of Abbottad Tehsil.</p>	

(10)

Jy

	<ul style="list-style-type: none">(i) Chamad(ii) Kassaki Kalan(iii) Pawa(iv) Rich Behn.(v) Thana <p>(c) Censuses charge No 01 (Havelian cantonment)</p> <p>(d) Censuses Charge No 9havelian MCO.</p> <p>(e) The following Patwar Circles of Havelian Qanungo Halka Of Havelian Tehsil</p> <ul style="list-style-type: none">(i) Havelian.(ii) Jahangra	321535
	Suggestions/ Proposal <ul style="list-style-type: none">(i) Add PC Bandi Atai Khan (+) 17533(ii) Add PC Rajoya (+) 14053(iii) Add PC Garhi Phullgran (+) 13329(iv) Add PC Langra (+) 25746(v) Subtract PC Salhad (-) 36018	356178
Pk-39 Abbottabad-IV	Preliminary Delimitation Proposal <ul style="list-style-type: none">(a) Censuses charge No 01 (Abbottabad cantonment)(b) Censuses Charge No 06 (ABBOTTABAD Municipal(c) Censuses Charge No 07 (Nawansher Town Committee) and(d) The following patwar circles Qanungo Halka o Oresh Qanongo Halka o Abbottabad Tehsil.<ul style="list-style-type: none">(i) Mirpur(ii) Kakool(iii) Nawansher Janubi-1(iv) Nawansher Janubi-2(v) Nawansher Shumali-1(vi) Nawansher Shumali-2(vii) Qasba.(viii) Shiekh ul Bandi-1(ix) Shiekh ul Bandi-2(x) Banda Pir Khan of Abbottabad District.	361967
	Suggestions/ Proposal <ul style="list-style-type: none">(i) Subtract PC Banda Pir Khan (-) 12513(ii) Add PC Chatri (+) 13833	363287

Edly

In view of the above it is humbly requested that the matter may be graciously looked in to and needful done in this regard.

Thanking you.

Yours sincerely,

1. Sardar Hukam Dad ^{Rehman}
S/O Sardar Fazal Dad (Late)
Village and PO Namli Maira (Kalan), Tehsil & Distt Abbottabad
District Abbottabad
CNIC #: 13101-0939253-3
Block Code: 022040305
Vote Serial #: 168 (Namli Maira Abbottabad)

[Signature]

ad ad.

2. Sajjad Hussain
S/O Gulzar Ahmad
Village and PO Namli Maira (Khurd), Tehsil & Distt Abbottabad
CNIC #: 13101-5310377-9
Block Code: 022040301
Thsil & Distt Abbottabad
Vote Serial #: 756 (Namli Maira Abbottabad)