



**BEFORE ELECTION COMMISSION OF PAKISTAN**  
**ISLAMABAD**

*M. H. Khan*  
*3/4/18*

Objection Petition No. \_\_\_\_\_-A/2018

Malik Muhammad Rafiq Awan son of Malik Haji Muhammad Din, resident of Langra Tehsil Havelian, District Abbottabad. Code No. 075020211, Voter No. 16 Langra.

**...PETITIONER**

**VERSUS**

1. Election Commission of Pakistan through Secretary Election Commission Islamabad.
2. De-limitation Committee Islamabad.
3. Provincial Election Commissioner Khyber Pakhtunkhwa, Peshawar.

**...RESPONDENTS**

**REPRESENTATION/ OBJECTION TO THE**  
DRAFT PROPOSAL IN RESPECT OF PK-37-38  
DISTRICT ABBOTTABAD AND NA-17, NA-18,  
ABBOTTABAD.

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**PRAYER: ON ACCEPTANCE OF INSTANT**  
REPRESENTATION DRAFT PROPOSAL IN  
RESPECT OF PK-38 ABBOTTABAD-III MAY

(2)

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KINDLY BE MODIFIED AS PER PROPOSAL  
ANNEXED WITH THE PETITION.  
ACCORDING TO LAW AND SIMILARLY  
MODIFICATION IN NA-15 AND NA-16 MAY  
ALSO BE MADE.

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Respectfully Sheweth:-

Facts giving rise to the titled petition are as under;-

1. That petitioner is a voter Union Council PC Langra in purposed constituency PK-37, Abbottabad.
2. That according to preliminary report of delimitation PC Langra-I and Langra-II are having geographically, compact area, Physical future, existing boundaries of administrative units and facilities of communications are with newly purposed PK-38 but it was excluded from PK-38 and included in the newly proposed PK-37 Abbottabad-II.

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3. That if PC Langra-I and Langra-II are purposed to be included PK-38 and PC Jhangra is excluded from PK-38 Abbottabad-III and included in PK-37 Abbottabad-II, It shall form geographically compact block and there are also communication facilities already existing in the proposed constituency and similarly PC Jhangra shall be excluded from NA-16 and shall be excluded in NA-15 and consequently PC Langra-I and Langra-II shall be included from NA-15 and included in NA-16, It shall also form homogenically and geographically compact block and shall also form good administrative unit and shall also be convenient to the people of the locality. Site plan showing proposed constituency of PK-37 and PK-38 are annexed as Annexure "A" preliminary report/ proposal is Annexure "B" while purpose and preliminary proposals of NA-15, NA-16 are annexed as Annexure "C" & "D" respectively.

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4. That, total population of PC Jhangra is 15418 while total population of PC Langra is 25746 hence modification in the constituency purposed above shall also not disturb the population plan and policy of the delimitation.

5. The purposed de-limitation report of the constituency NA-15, NA-16 & PK-37 & PK-38 may kindly be modified inter-alia on the following grounds.

**GROUND:-**

- a) That preliminary report of constituencies mention above is not according to law and rules of de-limitation.
- b) That preliminary report is not based on facts on grounds.
- c) That PC Langra is more contiguous and form compact block with NA-16 & PK-38 and while PC Jhangra is also geographically more contiguous and

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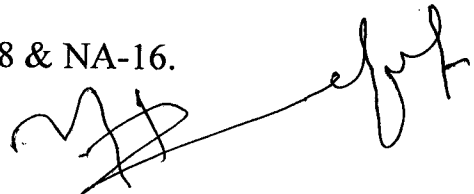
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having direct communicated facilities with PK-37 & NA-15.

- d) That above mentioned modification in the constituencies shall also not effect the population plan according to rules.

**PRAYER:-**


It is therefore most humbly prayed that PC Jhangra may kindly be excluded from PK-38 & NA-16 and may be included in PK-37 & NA-15 Abbottabad and similarly PC Langra-I & Langra-II may graciously be excluded from PK-37 & NA-15 and included in PK-38 & NA-16.



Malik Muhammad Rafique Awan  
...PETITIONER/OBJECTORS

Dated: 31/3 /2018

Through

  
(HAJI SABIR HUSSAIN TANOLI)  
Advocate Supreme Court of Pakistan,  
Abbottabad

**VERIFICATION:-**

It is verified on oath that the contents of foregoing revision petition are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

...PETITIONER/OBJECTORS

