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**BEFORE THE CHIEF ELECTION COMMISSIONER, ELECTION  
COMMISSION OF PAKISTAN ISLAMABAD**

Representation Petition No. \_\_\_\_\_/2018

1. Zulfiqar Ahmed Advocate s/o Haji Muhammad Ashraf Khan r/o House No. 847 sector No. 1 Khalabat Township Tehsil & District Haripur CNIC # 133020-463715-3 voter of proposed constituency PK-40 Haripur-I vote No. 29 block code 026060107. Cell No. 03421929722.
2. Khizar Hayat Khan Advocate s/o Umar Hayat Khan r/o House No. 955 Sector 4 Khalabat Township Tehsil & District Haripur CNIC # 42401-2013839-3 voter of proposed constituency PK-40 Haripur-I vote No. 77 block code 026060401. Cell No. 03212057452.
3. Muhammad Faisal Saeed Advocate s/o Ahmed Saeed Khan r/o House No. 1436 Sector 1 Khalabat Township Tehsil & District Haripur vote No. 442 block code 026060105 CNIC # 13302-0523684-7 Cell No. 03339874458.
4. Muhammad Ilyas Khan Advocate s/o Muhammad Younas Khan r/o House No. 1195 sector 1 Khalabat Township Tehsil & District Haripur CNIC No. 13302-8213991-3 voter of proposed constituency PK-4- Haripur-I, vote No. 581 block code 026060106. CELL 03005392594. *(voter certificates will be produced at the time of arguments)*  
.....OBJECTORS/ PETITIONERS

**REPRESENTATION / MEMORANDUM OF OBJECTIONS U/S 21  
(3) OF THE ELECTION ACT, 2017 READ WITH RULE 12 OF THE  
ELECTION RULES, 2017 FOR AMMENDMENT, ALTERATION  
AND MODIFICATION IN PRELIMINARY LIST OF  
CONSITUENCIES FOR PK-40, PK-41 AND PK-42 OF DISTRICT  
HARIPUR PUBLISHED U/S 21(1) OF THE ACT.**

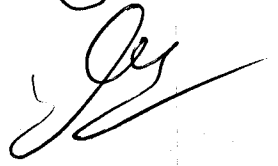
Respectfully sheweth:-



1. That the objectors submitting the instant representation / memorandum of objection are the permanent residents of Tehsil & District Haripur and registered voters of proposed constituency of PK-40 Haripur-I thus the objectors have got locus standi under the law to raise objections over the preliminary constituencies list published u/s 21(1) of the Act.
2. That the objectors have minutely observed the preliminary constituency list with the yard stick of statutory mandatory requirements for delimitation process i.e distribution of population 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.
3. That the objectors through instant representation submits their objections on the preliminary list of constituencies for PK-40 and PK-41 on the following grounds:

**GROUND S:-**

- a. That the preliminary list of constituencies for PK-40 and PK 41 lacks the statutory and mandatory essentials of geographically compact area, administrative control, facilities of communication and convenience of the public.
- b. That the Haripur district consist upon three Tehsils i.e. (1) Haripur (2) Ghazi and (3) Khanpur having total population about 1003031 out of which Tehsil

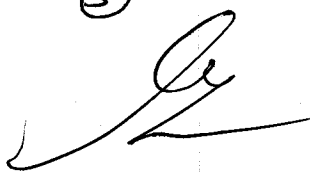


Haripur makes 684002 population, Tehsil Ghazi makes 145467 population whereas Tehsil Khanpur makes 173562.

- c. That Tehsil Khanpur and Tehsil Ghazi are lying on the boundaries of District Haripur i.e. on east side is Tehsil Ghazi and on the west side is Tehsil Khanpur whereas Tehsil Haripur is lying in between both the above the mentioned Tehsils.
- d. That the Turbela Lake / water reservoir is lying in between Tehsil Haripur and Tehsil Ghazi.
- e. That criteria set forth for making a constituency is total population of district divided by numbers of constituencies i.e. Total population of Haripur  $1003031 / 3 = 334343$  for each constituency.
- f. That for complying with the statutory requirement of population of each constituency in case of district Haripur wherein two tehsils i.e. Khanpur and Ghazi comprises less population from the criterion set forth under the law, whereas Tehsil Haripur comprises population above then the criterion hence, the want of population for tehsil Ghazi and Tehsil Khanpur is to be deducted from bigger tehsil Haripur in this regard it was mandatory requirement of law to delimit the constituency by including and excluding the areas geographically connected, making a compact block

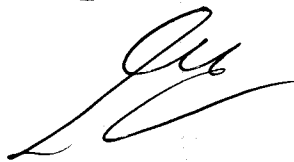
with the saturation of population, facilities of communication provided from, convenience of inhabitants / voters as well as Revenue / Administrative boundaries of the proposed constituency.

- g. That the Patwar circles of Qanoongo Halqa Haripur Tehsil Haripur i.e. Pandak, Mirpur, Ali Khan, Noordi which is included in PK-40 and Patwar circle Chajjian of Qanoongo Halqa Khanpur Tehsil Haripur which is not shown in any of the district Haripur constituencies PK-40, PK-41 and PK-42 in the preliminary list having population of 3632 by including these five Patwar circles in PK-41 the total population will make 66959, similarly from PK-41 the Patwar circles of Qanoongo Halqa Haripur i.e. Kholian Bala, Bagra, Dureshkhel and Gandhian (which is not shown in any of the constituencies in preliminary list having population 9298) should be excluded from PK-41 and to be included in PK-40 by including these four Patwar circles into PK-40 the population of these four Patwar circle will add 65905 in total population and will meet the required population for constituency and also it will make a compact block as the distance of Patwar circles Pandak, Mirpur, Ali Khan, Noordi and Chajjian is less than twenty five

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kilometer from Tehsil Khanpur whereas the Patwar circles Kholian Bala, Bagra, Dureshkhel and Gandhian have distance of more than forty kilometers from Tehsil Headquarter Khanpur thus the convenience of general public of these areas is greater in inclusion of these Patwar circles into tehsil Khanpur otherwise they will face severe inconvenience. This proposal is also shown in the color map along with population saturation chart of PK-40, PK-41 and PK-42 which is annexed herewith and marked as "A". List of Patwar circles along with population is annexed as "B".

- h. That the proposed constituency of PK-42 will remain unaltered with the same Patwar circles, geography and population.
- i. That the two Patwar circles i.e. PC Gandhian and PC Chajjian, are part and parcel of Qanoongo Halqa Khanpur but not the part of Tehsil Khanpur as per notification of Tehsil Khanpur dated 31.08.2017 these two Patwar circles were excluded from Tehsil Khanpur and were included in Tehsil Haripur. It is pertinent to mention that these two Patwar circles are not shown in any of the constituencies of district Haripur in preliminary list of constituencies whereas the population of these two Patwar circles is calculated into Tehsil

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Khanpur while these two Patwar circles are not part and parcel of Tehsil Khanpur. Copy of notification of Tehsil Khanpur dated 31.08.2017 is annexed herewith and marked as "C".

- j. That for the reasons above mentioned Patwar circle Gandhian may be included into PK-40 and Patwar circle Chajjian may be included into PK-41 by this population of both the constituencies will meet the requirement as well as these constituencies will become geographically compact units by meets and bounds.
- k. That this representation is well within time and this Hon'ble Commission has got jurisdiction to entertain the same.
- l. That the other grounds will be urged at the time of arguments.

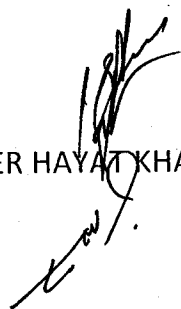
In the light of above, it is humbly prayed that on acceptance of the instant representation, the preliminary constituencies list for PK-40 and PK-41 may graciously be amended, altered and modified according to the objection raised in the instant representation / memorandum of objection in the larger interest of public at large. Any other relief this Hon'ble commissioner deems fit may also be granted.


Haripur

Dated: 02-04-2018

OBJECTORS / PETITIONERS

  
ZULFIQAR AHMED ADVOCATE

  
KHIZER HAYAT KHAN ADVOCATE

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MUHAMMAD FAISAL SAEED ADVOCATE

  
MUHAMMAD ILYAS KHAN ADVOCATE

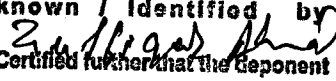
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**Verification:**

It is verified on oath that the contents of instant memorandum of objection / representation are true and correct to the best of my knowledge and belief and nothing material has been concealed therein.

OBJECTOR / PETITIONER

  
ZULFIQAR AHMED ADVOCATE

This affidavit has been sworn before me on this .....02... day of .....04 20...18... by the deponent who is personally known / identified by  Certified further that the deponent of this affidavit have been read over and explained to deponent who has understood and attested the same  
Serial No .....

  
Irshad-Mi-Haq  
Advocate High Court  
Oath Commissioner  
Islamabad

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**BEFORE THE CHIEF ELECTION COMMISSIONER, ELECTION COMMISSION**  
**OF PAKISTAN ISLAMABAD**

**REPRESENTAITON / MEMORANDUM OF OBJECTION**

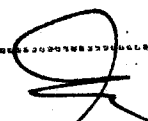
We, the following deponents;

1. Zulfiqar Ahmed Advocate s/o Haji Muhammad Ashraf Khan r/o House No. 847 sector No. 1 Khalabat Township Tehsil & District Haripur CNIC # 133020-463715-3 voter of proposed constituency PK-40 Haripur-I vote No. 29 block code 026060107;
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Today 2<sup>nd</sup> of April, 2018 at Islamabad do hereby solemnly affirm and declare on oath that the contents of forgoing representation / memorandum of objection are true and correct to the best of our knowledge and belief and nothing material has been concealed from this Hon'ble commission.

**DEPONENTS**

This affidavit has been sworn before me on this .....22 day of .....24 20 18 by the deponent who is personally known / identified by Zulfiqar Ahmed Certified further that the deponent of this affidavit have been read over and explained to deponent who has understood and attested the same  
Serial No .....

  
**Irshad ul-Haq**  
Advocate High Court  
Oath Commissioner  
Islamabad