

To

THE ELECTION COMMISSION OF PAKISTAN  
THROUGH SECRETARY, ELECTION COMMISSION,  
CONSTITUTIONAL AVENUE, ISLAMABAD

21/05/07/2018

**Subject:** Representation/ Objection Petition U/S 21 (3) Of The Election Reforms Act, 2017 R.W Rule-12 Of The Election Rules 2017 Against The Newly De-Limitation Of constituency Pk-61 Nowshera-1 (Erstwhile Pk-14 Nowshera-III).

Respected sir,

1. That the applicant is the permanent resident of Banda Chail, Kheshgi Payan and is a registered voter of the said area.

**(copy of the relevant document is annexed).**

2. That before the recent delimitation of the constituency of PK-61 nowshera-1, applicant was voter of erstwhile Pk-14 Nowshera-III which was comprising of the following patwar circles.

- i) BEHRAM KALAY
- ii) KALINGER
- iii) KHESHGI BALA
- iv) KHESHGI PAYAN
- v) NOWSHERA KALAN (MC)
- vi) NOWSHERA CANTT
- vii) AMANGARH (TC)

Whereas PK-62 erstwhile PK-16 Nowshera-V was comprising of the following patwar circle,s.

- i) RASHKAI-I
- ii) RASHKAI-II
- iii) KANDAR
- iv) RISALPUR CANTT
- v) PIR SABAQ
- vi) ZARA MIANA
- vii) MISRI BANDA

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- viii) ALI MUHAMMAD
- ix) MUGHALKI
- x) NANDRAK
- xi) MIAN ESSA

*Handwritten signature and date: 2/5/07/2.10*

3. That under the new setup and delimitation of constituencies Nowshera Kalan (MC/PC), Nowshera Cantt, and Amangarh (TC) were excluded whereas Misri Banda, Turlandi, Zara Miana, Pir sabaq, Kandar, Rashakai-I and Rashakai-II were included in PK-61 which was erstwhile PK-14 Nowshera-III.
4. That the constituency namely PK-61 Nowshera-I was constituted in such a casual & ignorant manner that the concern authorities did not bother & care for the boundaries of Tehsils & Qanungo circle's.
5. That the concern authorities also ignored the principles laid down for the formation of constituencies according to geographical contiguity & North clock wise formation.
6. That while constituting PK-61 Nowshera-I erstwhile PK-14 (Nowshera-III) it was incumbent upon the authorities to keep in view the geographical contiguity of Ksheshgi Bala (PC), Ksheshgi Payan (PC), Banda Chail (PC), Kalinger (PC), Behram Kalay (PC), Rashakai I (PC) & Rashakai-II (PC) & Nowshera Kalan (MC) as well as Nowshera Kalan (PC) as all these patwar circles and villages there in are situated towards the northern side of River Kabul and Ksheshgi Bala( PC), Ksheshgi Payan (PC) and Nowshera Kalan( PC/MC) are situated & connected to each other through Charsadda Nowhsera main road. Which further connects with the rest of patwar circle,s villages through Mardan Nowshera G.T Road in on chain.

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7. That Khashgi Bala (PC), Khashgi Payan (PC) & Nowshera Kalan (PC/MC) are geographically contiguous inseparable & economically interdependent on each other & also included in one administrative unit of qanungo halqa & Tehsil Nowshera. Previously in 2002 delimitation and before that the above mentioned patwar circle's qanungo circle,s/MC were the part & parcel of one & the same constituency.
  
8. That so for the criteria of population for a particular constituency is concerned the same could be maintained even if PC/MC namely Kandar, Pirsabaq , Zara Miana & Misri Banda, Turlandi are excluded & Nowshera Kalan PC/MC are included as after such changes the population of PK-61 would be 291,915

**(Copies Of Relevant Documents Are Attached)**

9. That it is also submitted for your kind information that Risalpur Cantt is a bridge between the areas situated on the east of PK-62 erstwhile PK-16 as one has to cross Risalpur Cantt while moving to east side of the constituency as the main road leads to Pir Sabaq goes through Risalpur Cantt. More over Pir Sabaq (PC) is linked patwar circle,s namely Badrashi, Nowhsera Khurd & Cantonement area of Nowshera Cantt through the bridge between Pir Sabaq & Deri Kati Khel. Therefore the criteria of population could be maintained after such changes in constituency PK-62 would be 308,015.
  
10. That similarly in the delimitation of PK-62 and PK-63 constituencies a gross illegality was committed and also the historical back ground of Akora Khattak as well as khattak tribe was ignored as Akora Khattak-I (PC/MC) was made part of PK-62 whereas Akora Khattak-II was made part of PK-63. Both these patwar circle,s should have been part of one constituency but even this was divided into two constituencies.

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11. That if patwar circle namely Akora Khattak-II are included in PK-63 than it will become the same previous position of constituency erstwhile PK-15 as in the delimitation of 2002 and it will also meet and maintain the requirements of population factor of the constituency PK-63 would be 295,284.
12. That it is also submitted for your kind consideration that Amangarh Industrial Town Committee , Pir Pai, Azakhel Payan, Azakhel Bala Patwar Circle,s are situated on the Main GT Road. Which was previously part of one constituency that is PK-13 before 2002 delimitation, therefore In the larger interest of the inhabitants of Amangarh (TC) to be the part of PK-64, similarly when Amangarh (TC) is included in PK-64 and then for keeping population requirement Banda Nabi (PC) has to included in PK-65 even otherwise Banda Nabi is situated in Tehsil Pabbi & it is more realistic for convenience point of view for the inhabitants of Banda Nabi (PC).
13. That keeping in view the above stated position the constitution of PK-61 has been made on unnatural & illegal basis as patwar circle,s Misri Banda, Turlandi, Zara Miana & Kandar has been included where as Nowshera Kalan (PC/MC) is excluded which is contiguous to (PC) Khesghi Bala, Khesghi Payan, Kalinger, Behram Kaly therefore it has rendered the delimitation of the said constituency against the rules.
14. That while constituting PK-61 all the determining factors including of patwar circle,s , Tehsil boundaries and conveniences of people have totally been ignored which necessitated the filing of instant objection petition.
15. That if the afore said desirous changes are not brought in the formation and delimitation of PK-61 Nowshera-I it would defeat the spirit and object of election reforms act 2017 and the rules framed there under.

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IT IS THEREFORE PRAYED THAT BY ACCEPTING THIS OBJECTION PETITION AMENDMENTS/ CHANGES MAY PLEASE BE BROUGHT IN CONSTITUENCY NAMELY PK-61 NOWSHERA-I, BY EXCLUDING PATWAR CIRCLE,S OF MISRI BANDA, TURLANDI, KANDAR, ZARA MIANA & PIR SABAQ AND BY INCLUDING NOWSHERA KALAN PC/MC AS TO BRING THE SAME IN CONFORMITY WITH THE CRITERIA LAID DOWN BY THE ELECTION REFORMS ACT,2017 AND THE RULES FRAMED THERE UNDER.

Applicant/Objector

*Fahad*

Shah Fahad S/O Naik Amal

R/O Banda Chail P.O Khesghi

Payan Tehsil & District

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Dated: 02-04-2018