

That feeling aggrieved from the draft list of constituencies as finalized and published under Section 21 of the Election Commission Act 2017, read with Rule 10(7) and 11 of the Election rules the applicant is filling the instinct representation/Appeal on the following grounds inter alia:

GROUNDS

That the proposed constituency PK- 63 has been drawn/finalized without adhering the principles of delimitation as enunciated in Section 20 of the Election 2017 read with Rule 10 of the Election rules 2017.

1. That Union Council Khwaishki Bala, UC Khawaishi Payan and UC Bahram Kaley (Ganderi) have been excluded whereas UC Risal Pur Cantt, UC Nowshera Khurd, UC Akora Khattak II and UC Badrashi have been included in the proposed Constituency PK-63 Nowshera-III.
2. That Risalpur Cantt is being included from the proposed Constituency PK- 61, since Akora Khattak II has been made a part from PK- 62 whereas Badrashi and Nowshera Khurd have been incorporated in PK 63 from the proposed constituency PK-64.
3. That the proposed constituency PK 63 has a population of 307,000, the eliminated 03 UCs had a population of 101,982, whereas the 04 UCs added in it have population of 145,507. Now the residents of newly added UCs are altogether strange to the applicant and vice versa, resultantly this will badly affect the vote bank of the applicant, who was runner up in the 2013 Elections and is a strong candidate for the upcoming elections from the area.
4. That Nowshera Kalan (MC) consists of four Union Councils specifically UC Naway Kaley, UC Chuki Town, UC Nowshera City and UC Kabul River. According to the section 20 principles of delimitation, distribution of population in geographically compact areas, Khander in actual is the half part of Union Council Kabul River in the Proposed constituency PK-63. Khander is redrawn with PK- 61 in an ignorant manner which indisputably breaks the aforementioned principles and affects the electoral process and public.
5. That the two of the freshly added UCs i.e Nowshera Khurd and Badrashi, collectively carrying a large number of voters with approx 90,000 population have been taken from PK 64 (formerly PK 13) thus it may also be done with malafide intentions and could result in negative outcomes for the applicant in the election 2018.
6. That according to the section 20 principles of delimitation, considering the physical features of the two UCs mentioned in clause 4 (i.e Nowshera Khurd & Badrashi) are hard to be campaigned because of tough and elongated access, commuting is not possible for residents and without proper conveyance the areas during the campaign will be impossible to reach, which will also be a great inconvenience to voters besides a loss of vote bank to the applicant.
7. That the proposed constituency PK 63 outsized population is situated at one side of the river which united them geographically compact, culturally knotted and historically communitised. Whereas the splitted population on the opposite bank of the river has also been included illogically. Now among this population, the two Union Councils namely Nowshera cantt and Aman Gharh had been added in the last census on the bases of homogeneity in the creation of a constituency (The then PK -14 now PK- 63). After the redrawing , as aforementioned in clause 1, the two Union Councils i.e Nowshera Khurd and Akora Khattak II have been restructured in the same lane with Union Council Nowshera Cantt and Aman Garh, are acceptable to some extend due to geographical compactness.

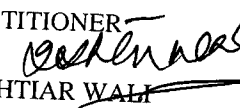
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8. That the issue starts when the name of Union Council Badrashi (previously was a part of PK-13 now PK-64) is added in the proposed constituency PK- 63.because it appears adjacent to the other Union Council in the map but actually it situates from the other Union councils at quite a distance. This is against the distribution of population of geographically compact area because it falls in a far corner having difficult passage with bridges and non-metalled roads with un-availibility of proper conveyance. Thus the residents (population of 73256) find it hard to reach their candidate and may get deprived of the developmental projects and welfare schemes in future because of being a separated segment of the residents
 9. That after making the proposed adjustments the constituencies get imbalanced in terms of population. Therefore the union council Banda Nabi from the proposed constituency PK-64 is proposed to be made a part of PK-65.
 10. That for further adjustment in terms of population Union Council Pir Pai from the proposed constituency PK-64 is to be included in the proposed constituency PK-63 although it will be an unknown residents for the applicant.

The following Exhibit Shows the suggested inclusion and exclusion of population/Union Councils with reference to different constituencies.

S.No	Draft list Proposed Population	Suggested Inclusion/Exclusion of Union Councils/Parts	Suggested Population
1.	PK-61= 314,076	khander excluded	
2.	PK-63= 307,060	khander from Propd PK-61 & UC Pir Pai from PK-64 included, UC Badrashi excluded	289,673
3.	PK-64= 291,316	UC Badrashi included. UC Pir Pai & UC Banda Nabi excluded from the Propsd PK-64	282,506
4.	PK-65= 293,386	UC Banda Nabi from Propsd PK-64 included	322,962
			310,697

Prayer:

It is therefore humbly prayed that on acceptance of this representation the proposed delimitation of constituency PK-63 (the then PK-14) may kindly be redrawn and khander from the proposed constituency PK-61 (which is already a part of UC Kabul River from the proposed constituency PK-63) including Pir Pai From the Proposed constituency PK-64 may kindly be ordered to be included in the proposed constituency PK-63 and Union Council Badrashi to be excluded from the proposed constituency pk-63 Nowshera III & may kindly be ordered to be included in the proposed constituency Pk-64 Nowshera IV.

PETITIONER

 IKHTIAR WALI
 S/O MUKHTIAR WALLI,
 NOWSHERA HOUSE,
 VILLAGE KISHTI PUL,
 MARDEN ROAD,
 KABUL RIVER,
 NOWSHERA