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**BEFORE THE ELECTION COMMISSION OF PAKISTAN**  
(through Secretary Election Commission of Pakistan)

REPRESENTATION UNDER SECTION 21(3) FOR  
AMENDMENT TO THE PRELIMINARY/DRAFT  
PROVINCIAL ASSEMBLY CONSTITUENCIES  
PK-64 AND PK 65 OF DISTRICT NOWSHEHRA  
AS PUBLISHED IN THE DRAFT LIST OF  
CONSTITUENCIES

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*Respectfully Sheweth;*

The essential facts necessitating this representation are:

**FACTS:**

1. That applicant is permanent resident of Nowshehra bearing CNIC number 17201-3652941-9, and is enrolled as voter in Akbarpura Tehsil Pabbi District Nowshehra
2. That in the draft list of constituencies as finalized and published under Section 21 of the Election Act, 2017 read with Rule 10(7) and 11 of the Election rules the applicant falls in PK 64 Nowshehra IV in of the Draft list of constituencies. In the published list of constituencies, Patwar Circle Shindi Payan has been included in the preliminary/draft PK 64. This PC was earlier part of the former constituency of the former PK 12 constituency, now PK-65 in the draft list of constituencies.
3. That the inclusion of the applicant and the PC to which he belongs in the preliminary/draft PK-65 cause inconvenience to the public and distributes geographically compact and coherent areas in different constituencies, thus prefers this representation on the following grounds:

## 4 7/8 GROUNDS

A. **Because** the proposed constituency PK 64 and PK 65 have been drawn without adhering to the principles of delimitation as enunciated in Section 20 of the Election Act, 2017 read with Rule 10 of the Election rules 2017.

B. **Because** the Patwar Circle Akbar Pura Shindi Payan made part of the draft PK-64 creates a pocket in another constituency. There are no access routes from the said constituency to this Patwar Circle. The only access route is through GT Road near Pabbi which makes the heart of the draft/preliminary PK-65 constituency.

(Reference is made to the maps annexed herewith marked – A (map obtained from Election Commission & B- as proposed by applicant)

C. **Because** Akbarpura Shindi Payan was earlier part of the PK-12, now preliminary/draft PK-65 Constituency. Population of the PC is dependent on Pabbi, which is the Tehsil Headquarter of Tehsil Pabbi. The economic, social and political relations of the people are inseparable from Pabbi and the proposed Pk-65 constituency.

D. **Because** PC Jabba Khattak is geographically contiguous and compact with the draft /preliminary PK 64. As the name suggests PC Jabba Khattak is inhabited by Oryakhel Khattak. This clan of Khattak tribe is spread from Manki Sharif to Jabba Khattak on one geographic stretch. More easy access to Jabba Khattak is via a direct metallic road from Azakhel, Cherat Cement factory. Thus exclusion of PC Jabba Khattak from the preliminary/draft Pk-65 and its inclusion in PK 64 makes up for a more homogenous and compact constituency of PK 64. By this proposed change in the constituencies through the proposed exclusion of PC Jabba Khattak from PK 65 and its inclusion in PK 64 and the inclusion of PC Tarkha Shindi Payan from PK 64 and its inclusion in PK 65 serves public interest and convenience in the delimitation.

E. **Because** the proposed change/alteration doesn't affect the population distribution. Population of PC Jabba Khattak is 28402 and population of PC Shindi Payan is 34051. Population distribution in preliminary PK-64 and PK-65 in the preliminary delimitation is:

a) PK-64 291316

b) PK 65 293386

As per the proposal in this representation the population distribution comes at:

a) PK -64 285667

b) PK-65 299035

IN VIEW OF THE ABOVE PATWAR CIRCLE TARKHA SHINDI BALA MAY KINDLY BE EXCLUDED FROM DRAFT/PRELIMINARY PK 64 AND INCLUDED IN PK 65 AND PC JABBA KHATTAK MAY KINDLY BE EXCLUDED FROM PK 65 AND INCLUDED IN PK 64. IN VIEW OF THIS THE PROVINCIAL CONSTITUENCIES PK 64 AND PK 65 OF DISTRICT NOWSHEHRA MAY BE DELIMITED IN THE FOLLOWING MANNER:

PK 64:

The following Patwar Circles of Nowshehra Qanungu Halqa of Nowshehra Tehsil:

A)

- i) Azakhel Bala
- ii) Azakhel Payan
- iii) Shekhi
- iv) Manki Sharif
- v) Tangi Khattak
- vi) Walai-I
- vii) Walai-II
- viii) Pir Pai

B)

The following Patwar Circles of Pabbi Qanungu Halqa of Pabbi Tehsil

- i) Amankot
- ii) Chowki drab
- iii) Banda Mohib
- iv) Banda Sheikha Ismail
- v) Banda Nabi
- vi) Dagai
- vii) Jabba Daudzai
- viii) Ghari Momin
- ix) Zakhi

**POPULATION 283654**

PK 65

- a) Census Charge No. 1 Cherat Cantonment
- b) Census Charge No. 2 Pabbi Municipal Committee
- c) Pabbi Qanungo Halqa of Pabbi Tehsil excluding the following PCs
  - i) Amankot
  - ii) Chowki Drab
  - iii) Banda Mohib
  - iv) Banda Sheikh Ismail
  - v) Banda Nabi
  - vi) Dagai
  - vii) Jabba Daudzai
  - viii) Ghari Momin
  - ix) Zakhi

**POPULATION 301048**

(Note: This representation and the proposed delimitation of affects PK 64 AND PK-65, and doesn't affect any other constituency in the District, thus the delimitation of these two constituencies are given in the representation, the rest of constituencies in the District may kindly be considered /given detailed as proposed in the preliminary list of constituencies.)

It is therefore prayed that on acceptance of the instant representation in view of the above the delimitation of the provincial constituencies of District Nowshera, specifically PK 64 and 65 may kindly be delimited as proposed in this representation.

Hazrat Bilal

S/O Muhammad Anwar Shah

R/O Mohalla Shaheed Abad, Akbarpura

Tehsil Pabbi District Nowshera

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