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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 PROPOSED PROVINCIAL
ASSEMBLY CONSTITUENCIES OF DISTRICT
PESHAWAR (URBAN) IN PARTICULAR THE
PROPOSED CONSTITUENCY PK-77 PESHAWAR-
XII AS PUBLISHED IN THE DRAFT LIST OF
CONSTITUENCIES

Respectfully Sheweth;

The essential facts necessitating this representation are:

FACTS:

1. **That** applicant is permanent resident of Peshawar bearing CNIC number 17301-1456828-7, and is enrolled as voter enrolled as Voter No. 113, Book No. 0371140203 Akhun Abad No. 4 Peshawar.
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 77 PESHAWAR XII in of the Draft list of constituencies. In the published list of constituencies.
3. **That** Census Charge 14, Circles 1 & 2 which make part of the Akhun Abad area have been excluded from the draft/preliminary PK-77 and appended to the preliminary/draft PK 79. Delimitation in this manner cause inconvenience to the public, and divides geographically compact area in different constituencies.
4. **That** the applicant thus prefers this representation on the following grounds:

*voter certificate will be
produced at the time
of hearing.*

GROUNDS

- A. **Because** the draft/preliminary constituencies PK 77 and PK 79 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 areas making part of Akhun Abad which are part of Census Charge 14, Circles 01 and 02 are situated opposite the historical Ganj Gate, (one of the walls around the perimeter of old Peshawar city) on main Phandu road. Exclusion of this area from PK 77, which is an entirely urban constituency, and appending it to a rural constituency PK 79 (mostly agricultural outside the urban area is unwarranted and unjustified. (Reference is made to the maps annexed herewith marked – A (map obtained from Election Commission & B- as proposed by applicant)
- C. **Because** the population in Census Charge 14 Circles 01 & 02 are socially and culturally homogenous and geographically compact making it an integral and inseparable part of the city (Ganj Gate area)(draft/preliminary PK – 7). Uprooting the urban population mass from its core and appending it to a largely is unjustified, and violates the rules and principles of delimitation.
- D. **Because** the Census Charge 14 circles 1 & 2 is exclusively urban territory is under the Town Municipal Administration (Town-I) while the territory of draft/preliminary PK-79 falls entirely under the Town Municipal Administration 4, excluding this area. Therefore excluding the same from PK-77 and making it part of a constituency in Town 4 area creates administrative anomalies and problems for public and electorate.
- E. **Because** the grounds urged for inclusion and exclusion of certain areas from PK 77 affects preliminary/draft constituencies PK 77 and 76, the following proposal is in order with supporting reasons as below:
- a) Exclude Census Charge 14 Circle 1 & 2 from PK 79 and include it in PK 77 (reasons detailed in the grounds)

- b) Exclude Charge 7 Circle 05 from PK 77 to PK 76. This population is inhibiting Railway Colony and Changar Abad which is contiguous and compact with the PK 76 and are located deep inside on the opposite side of the old Peshawar city across the Peshawar Khyber GT Road. Comparative Population distribution as proposed in this representation comparative to as proposed in the draft/preliminary representation is given below

Constituency	Population in preliminary delimitation	Population in the proposal given in representation
PK 77	298858	302827
PK 76	294498	316738
PK 79	313410	287201

IN VIEW OF THE ABOVE THE PROVINCIAL CONSTITUENCIES OF DISTRICT PESHAWAR (URBAN) MAY KINDLY BE DELIMITED IN THE FOLLWING MANNER:

PK-75

- a) Peshawar Cantonment Excluding Circle No.4& 6 of Charge No.1 (70,741-12,638=58,103) 58103

b) Charge No.07	
Circle No. 14	18,070
Circle No. 15	10,062
Circle No. 16	11,843
c) Charge No. 15EX.Cir.1 (105283-15980=89303)	89303

- d) The Following Census circles of Charges No. 16 of Peshawar MC.

Circle No. 1	16,430
Circle No. 2	11,623
Circle No. 3	8,760
Circle No. 4	8,607
Circle No. 5	19,514
Circle No. 6	13,807
Circle No. 7	17,913
Circle No. 8	14,750
Total	298,785

PK-76

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a) Census Charges No. 07 of Peshawar MC. Excluding the following Census Circles; Circle No.01,02,14,15, & 16 (383985-92812=291173)	
Circle No. 3	20,525
Circle No. 4	20,412
Circle No. 5	22,240
Circle No. 6	15,132
Circle No. 7	11,845
Circle No. 8	18,143
Circle No. 9	9,055
Circle No. 10	15,688
Circle No. 11	25,606
Circle No. 12	18,839
Circle No. 13	32,360
Circle No. 17	30,772
Circle No. 18	24,947
Circle No. 19	17,572
Circle No. 20	9,308
Circle No. 21	17,140
Circle No. 22	9,698
Total	319,282

PK-77

a) The following Census Circles of Charge No.07	
Circle No. 1	9,716
Circle No. 2	15,012
b) The following Charges of Peshawar MC	
i. Charge No. 8	40,113
ii. Census Charges No. 9	169,257
Census Circle No. 10	37,550
c) Census Circle No. 1 of Charge No. 12	4,309
d) The following Census Circles of Charge No. 14	
Circle No. 1	14,691
Circle No. 2	11,518
Total	302,166

PK-78

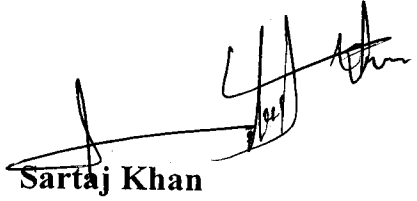
a) Census Charges No. 11	28,112
b) Census Charges No. 12 ex. CIR-01 45469-4309=41160	41,160
c) Census Charges No. 13	206,592
d) CIR. 01 of Charge No. 15	15,980
Total	291,844

PK-79

a) Census Charges No. 14 ex.	192,111
Circle No. 01=14,691	
Circle No. 01=11,518	
218320-26209=192111	
b) The following PCs of Badhbair QH	
AHMAD KHEL	23,402
BAZID KHEL	18,525
DEH BAHADUR	12,135
MUSA ZAI	19,152
UTMAN ZAI	21,876
Total	287,201

PK#	NOTIFIED BY ECP	PROPOSED
PK-66	296593	296593
PK-67	309422	309422
PK-68	317337	317337
PK-69	315234	315234
PK-70	318510	318510
PK-71	317912	317912
PK-72	306432	306432
PK-73	288996	288996
PK-74	299365	299365
PK-75	295046	298785
PK-76	294498	319282
PK-77	298857	302166
PK-78	297467	291844
PK-79	313410	287201
TOTAL	4269079	4269079

It is therefore prayed that on acceptance of the instant representation in view of the above the delimitation of the provincial constituencies of District Peshawar (Urban) may kindly be delimited as proposed in this representation.



Sartaj Khan

S/O Lajbar Khan

R/O Akhunabad No. 4

Peshawar

CNIC NO 17301-1456828-7

CELL NO. 0333 9122933

APPENDIX

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List of voters which include local government elected councilor and Nazims who have similar objections as raised in the Representation before the ECP over the preliminary delimitation of their Constituency and have authorized the applicant to act in representative capacity on behalf of them as well.