



**BEFORE THE ELECTION COMMISSION  
OF PAKISTAN THROUGH SECRETARY**


**MEMORANDUM OF REPRESENTATION/  
OBJECTION PETITION UNDER SECTION  
21(3) OF THE ELECTION ACT, 2017  
READ WITH RULE 11 AND 12 OF  
THE ELECTION RULES, 2017  
AGAINST THE PROPOSED DELIMITATION  
OF PK-31 MANSEHRA-2.**

Respectfully Sheweth!

1. That, the petitioner is a permanent resident of Village Baidra union council Jaloo, Tehsil and District Mansehra and also registered voter of formerly PK-53 and now PK-32 and is aggrieved due to exclusion of Patwar Circle Jaloo Debgran Shahelia of Qanungo Halqa of Tehsil and District Mansehra from PK-31 and by including the same in PK-32 formerly PK-53.

*(Copy of proposed notification is annexed as annexure "A").*

2. That, the petitioner is a permanent resident of Tehsil and District Mansehra and residing there from

  
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his forefathers and is also hailing from political and social family of Tehsil Mansehra and nowadays he is a District Mansehra from union council Jaloo, Tehsil and District Mansehra.

3. That, the District Mansehra consists upon Tehsil Mansehra, Tehsil Balakot and Tehsil Oghi, three administrative units separated by natural geographical boundary of mountainous range with varying height from 8000 to 12000 Sq.ft. above sea level. All these three administrative units are connected through a narrow gauge road passing the Susal Gali to Tehsil Oghi, Damgala to Tehsil Balakot through MNJ (Mansehra Naran Jalkhad) Road and that prior to proposed delimitation all the three old Tehsils i.e. Mansehra, Oghi and Balakot and their respective administrative boundaries are the limits of their respective constituencies i.e. PK-30, PK-31 and PK-32 formerly PK-52, PK-53 and PK-54.
4. That, before proposed delimitation, Patwar Circles Jaloo Debgran

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Shahelia was also part of PK-31 formerly PK-53 but due to new census of 2017, Patwar Circle Jaloo Debgran Shahelia was separated from PK-31 and was added in PK-32 due to population of Tehsil Mansehra. Similarly, Patwar Circle Potha was also excluded from PK-31 and was added in PK-32. The inclusion of Patwar Circles Jaloo Debgran Shahelia alongwith potha in PK-32 against the wills of the people of the above-mentioned Patwar Circles is a clear discrimination and heavy loss to the peoples of the above-mentioned Patwar Circle.

5. That, the total population in District Mansehra according to new census is 15,55,460 in numbers and which has been divided into two seats of National Assembly and 05 seats of Provincial Assembly.

*(Copy of census report is annexed as annexure "B").*

6. That, exclusion of Patwar Circles Jaloo Debgran Shahelia from PK-31 and inclusion of Patwar Circle Mongan,



Gandhian in PK-31 in the proposed delimitation is without any geographical compactness e.g. police line, District Jail, Industrial area and police school are situated in union council Jaloo which is part and parcel of Mansehra City and is situated at a distance of 01 Kms from Municipal limits of Mansehra and 02 KM from Mansehra city and thus is a part and parcel of Mansehra city.

*(Copy of map of District Mansehra and proposed delimitation are annexed as annexure "C" & "D").*

7. That, Patwar Circles Jaloo Debgran Shahelia is part and parcel of Tehsil Mansehra and very nearer to Mansehra City and peoples of above-mentioned Patwar Circle have their businesses and all other residential activities in Mansehra City whereas by including the above-mentioned Patwar Circles in PK-32 i.e. in different constituency of Tanawal Area, the area of Patwar Circle Jaloo Debgran Shahelia lost its sight and secondly peoples have to travel to mountainous and hilly areas and to cross dangerous areas to reach their polling stations situated at Tanawal area, which is very

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difficult for the people of above-mentioned Patwar circles.

8. That, in the proposed delimitation, PK-1 Chitral and PK-35 Torghar have been ignored due to their geographical location, administrative and communication problems.
9. That, this Honourable commission can appoint a local commission for physical inspection of proposed delimitation of constituencies particularly area of Patwar Circle Potha, Gandhian and Labarkot.
10. That, in Patwar Circle of Jaloo Debgran Shahelia population amounting to almost 13,000 and above-mentioned Patwar Circle is part and parcel of Mansehra city have the propriety right to be included in PK-31 as the population of above-mentioned Patwar Circles have physical, geographical and cultural compactness and easily accessible through land and are also adjacent to Mansehra city whereas Patwar Circles of Mongan, Gandhain can easily be excluded from PK-31 and can easily be

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included in PK-32 so, the population of above-mentioned areas and Patwar Circle can easily cast their votes on nearest polling stations and can elect their representatives according to their whims and wishes.

11. That, it is also pertinent to mention here that the peoples of Tanawal Area as well as Jaloo Debgran Shahelia have different cultural, language, local customs and residential activities and Patwar Circle Jaloo Debgran Shahelia is also totally dependent upon Mansehra city i.e. for Judiciary, Tehsil Administration (Assistant Commissioner, Tehsildar, Girdawar etc) Tehsil Municipal administration, Education, Health, Business, markets, all day to day affairs are linked with PK-31 Mansehra city.

.....PRAYER.....

**It is, therefore, most humbly** prayed that on acceptance of the above-mentioned objections, Patwar Circles Jaloo Debgran Shahelia may

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please be allowed to be included as  
part of PK-31 Mansehra-2 instead of  
PK-32 Mansehra-3.

Dated 02.04.2018

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**MOHSIN ALI KHAN**  
Son of Sahadat Hussain Khan  
Resident of village Baidra,  
Tehsil and District Mansehra.  
**NIC No.13503-1520118-3**  
**(IN PERSON)**  
**BEING ADVOCATE**

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**AFFIDAVIT.**

I, Mohsin Ali Khan son of Sahadat Hussain Khan resident of village Baidra, Tehsil and District Mansehra, petitioner, do hereby solemnly affirm and declare on oath that the contents of the foregoing memorandum of objection are true and correct and nothing has been concealed from this Honourable Commission.

Dated 02.04.2018

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Mohsin Ali Khan  
(DEPONENT)

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**ATTESTED**  
GHAFIL NAWAZ ADVOCATE  
Oath Commission  
Date: 01/04/18  
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Annexure  
A

No. and name of constituency.	Extent of constituency	Population
PK-30 Mansehra-I	(a) Balakot Tehsil, and (b) Attar Shisha Patwar Circle of Labarkot Qanungo Halqa of Tehsil Mansehra. of Mansehra District.	310896
PK-31 Mansehra-II	(a) Census Charge No.07 of Mansehra Municipal Committee; (b) Mansehra Qanungo Halqa excluding the following Patwar Circles: (i) Jallo; (ii) Shahelia; (iii) Lissan Takral; (iv) Debgran; (v) Khowari; (vi) Behali; (vii) Mathiyal; and (viii) Potha. (c) Labarkot Qanungo Halqa, excluding Attar Shisha Patwar Circle; and (d) Ghandian Patwar Circle of Baffa Qanungo Halqa of Baffa Pakhal Tehsil. of Mansehra District.	310163
PK-32 Mansehra-III	(a) The following Qanungo Halqas of Mansehra Tehsil: (i) Phulra; and (ii) Bheer Kund. (b) The following Patwar Circles of Mansehra Qanungo Halqa of Mansehra Tehsil: (i) Jallo; (ii) Shahelia; (iii) Lissan Takral; (iv) Debgran; (v) Khowari; (vi) Behali; (vii) Mathiyal; and (viii) Potha. (c) The following Patwar Circles of Baffa Qanungo Halqa of Baffa Pakhal Tehsil: (i) Nokot; and (ii) Tarangari Sabar Shah of Mansehra District.	300161
PK-33 Mansehra-IV	(a) The following Tehsils of Mansehra District: (i) Oghi Tehsil; and (ii) Darband Tehsil. (b) The following Patwar Circles of Ichherian Qanungo Halqa of Baffa Pakhal Tehsil: (i) Battal; and (ii) Ahal. of Mansehra District.	311278

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DISTRICT AND TEHSIL LEVEL POPULATION SUMMARY WITH REGION BREAKUP

KHYBER PAKHTUNKHWA

**Annex**  
**B**

<u>DISTRICT / TEHSIL</u>	<u>REGION</u>	<u>POPULATION</u>	<u>NO OF HH</u>
MANSEHRA DISTRICT		1,556,460	239,275
	RURAL	1,411,605	217,494
BALA KOT TEHSIL	URBAN	144,855	21,781
	RURAL	273,089	45,659
MANSEHRA TEHSIL	RURAL	273,089	45,659
		1,017,643	156,098
OGHI TEHSIL	RURAL	872,788	134,317
	URBAN	144,855	21,781
		265,728	37,518
	RURAL	265,728	37,518