

8/30/03/2018

**BEFORE THE ELECTION COMMISSION**  
**OF PAKISTAN ISLAMABAD**

**MEMORANDUM: REPRESENTATION AGAINST DELIMITATION OF PK-32**  
**DISTRICT MANSEHRA**

Sir,

The Applicant submits as follows

**FACTS:**

1. That the draft delimitation of PK-32 issued by the commission contains 4 union councils of Previous PK-57 Qanungo Halqa Phulra (Tanawal) Mansehra Tehsil.
2. That 3 Union councils added from old PK-53 Qanungo Halqa Mansehra.
3. That the other 5 union councils, have been included in PK-32 Bherkund Qanungo Halqa of the Tehsil Baffa (Pakhal) the old PK-55 that two patwar circles Nokot & Tarangri Sabir Shah <sup>are</sup> included in PK-32 from Tehsil Baffa Pakhal pervious PK-56 (Site plane of PK-32 annexure A). *Detim totia B*  
That the delimitation is being challenged on the following grounds.

**GROUND:**

- A. That no national or provincial seat has been increased or decreased in Mansehra District therefore the change in the constituencies is without reason & unnecessary.
- B. That original area of old PK-57 was consisting of 10 union councils out of which 6 Union Councils are placed in PK-33 and 4 Union councils are included in PK-32 & Union Council are increased 10 to 12.

Against delimitation of PK-33 a separate representation is being filed by the voters of PK-33.

- C. That previous PK-57 was consisting of area of upper Tanawal namely the Amb state which was an independent state and was exclusively ruled by the Nawab of Amb and was accessed to Pakistan on 31-10-1947 which was accepted by the then governor general of Pakistan Qaid-e-Azim Muhammad Ali Jinnah. (copy of order of accession attached as annexure B). <sup>is</sup>
- D. That the administrative natural & original boundaries of Amb State remained intact up till now in the shape of PK-57 which are now disturbed by this delimitation.

E. That the commission violated the principle of delimitation given under section 20 of Election Act 2017 in the following manners.

i. That the distribution of population by the commission as shown in the following competitive table is illegal.

PK-22	271160 Population	PK-23	387025 Population
PK-24	370720 Population	PK-25	306337 Population
PK-26	202913 Population	PK-27	275461 Population
PK-28	228886 Population	PK-29	247726 Population
PK-30	310896 Population	PK-31	310163 Population
PK-32	300161 Population	PK-33	300278 Population
PK-35	171345 Population	PK-39	361967 Population

- ii. That the commission was authorized under section 20(3) of the election Act 2017 only 10% variation in between constituencies. The Table shows variation much more the law allows hence the act of commission is un law full.
- iii. That entire Amb State area is populated by Hindal Tribe of Tanolis with its about 20 sub cast fellows of the Marshal Race of the Hazara & others since about three hundred years.
- iv. That entire merged area (AMB State) has been declared a backward area by the provincial government which is now attached with Mansehra where Swati, Awans & others advance tribes are populated since years & years which affected the homogeneity of the people of Tanawal who have the different lifestyle.
- v). That the commission failed to consider the geographically compact area of Tanwal and bifurcated it into various parts and included it in Baffa Pakhal Tehsil, Mansehra Tehsil and thus also damaged the physical features which were distinguishing the people of Tanwal from the others.
- vi) That the commission did not examine the facilities of communication and convenience of the people of Tanwal which they enjoy for years and years with in the earlier constituency of PK-57.
- vii) That the commission ignored the fact of Cognate, the blood relations, Kiths and Kins, parents, sons and daughters the whole norms of Tanoli Tribe by including Tanwal in PK-32 and PK33 there relations are now divided in to four different constituencies.

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*PK-57/2012*

- vii) That the commission ignored the fact that entire old PK-57 (Tanawal) people are Hindko speaking have different lifestyle which were placed in shape of ~~six~~ <sup>4</sup> union councils in PK-32 Pakhal & Mansehra whereas people of six union councils are included in PK-33 Agror & Konsh Pashto speaking areas thus effected the homogeneity of the Tanoli Tribe and is against the principle of delimitation.
- viii) That now the population of old PK-57 is 214141 at present and 14 villages of the PK-57 were deleted in the past delimitation and included with District Haripur. It is proposed that same villages be restored to old PK-57 to increase the population.

*Census Copy B.*

In the light of above reasons it is prayed that by revisiting old constituencies PK-53, PK-55, PK-56 the area of PK-57 be restored upon QH Shergarh & QH Phulra or any other suitable order may please be passed.

Habib-ur-Rehman Tanoli Son of Safdar Ali Resident of Murat Mera U/C Pherana a Voter of PK-32 Mansehra ..... Applicant

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