

BEFORE THE ELECTION COMMISSION
OF PAKISTAN, ISLAMABAD THROUGH
SECRETARY.

MEMORANDUM OF REPRESENTATION/
OBJECTION PETITION UNDER SECTION
21(3) OF THE ELECTION ACT, 2017 READ
WITH RULES 11 AND 12 OF THE
ELECTION RULES, 2017 AGAINST THE
PROPOSED DELIMITATION OF PK-38
ABBOTTABAD 3.

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10/04/2018

Respectfully Sheweth!

1. That, the petitioner is a registered votes of PK-38 Abbottabad 3 and formerly PK-47 Abbottabad 4 and is aggrieved due to inclusion of Patwar circles of Orash, Qanungo Halqa of Tehsil Abbottabad namely Baldheri, Banda Qazi and Jhangi by including the same from PK-36 formerly PK-47.

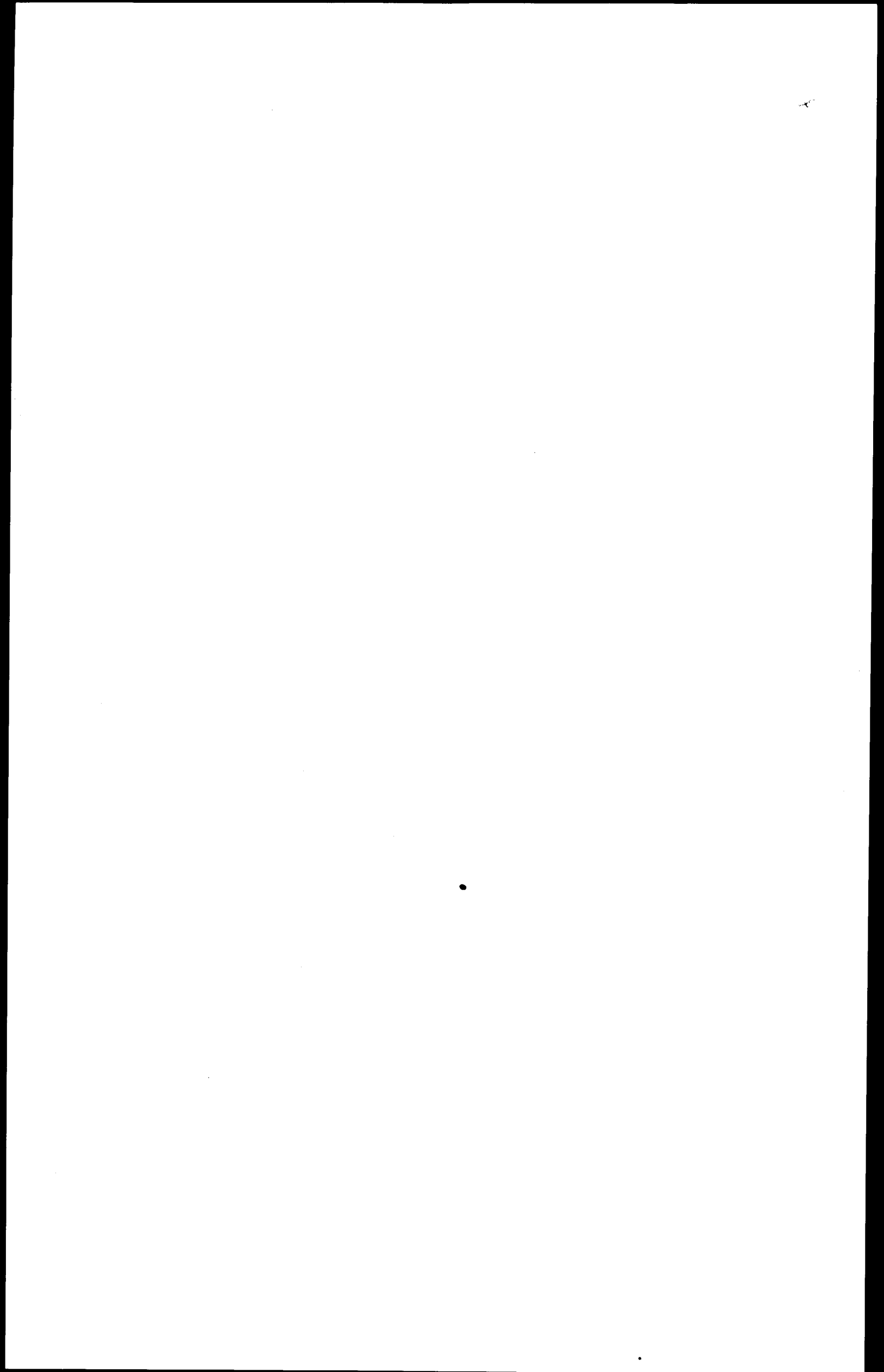
(Copies of proposed notification is annexed as annexure "A").

2. That, the petitioners are permanent residents of Tehsil Havelian and are residing there from forefathers and are also hails from the political and social families of Tehsil Havelian.

3. That, District Abbottabad firstly consists of Tehsil Abbottabad and Tehsil Havelian and nowadays two new Tehsils i.e. Tehsil Lora and Tehsil lower Tanawal Lora has been established and four administrative units separated by a national geographical boundary of (mountains range and river and plane) all these administrative units are connected through roads and others sources and also connected through KKH and that prior to the proposed delimitation both the old Tehsils and their respective administrative boundaries are the limits of their respective constituencies i.e. PK-46, 47 and 48.

4. That, before the proposed delimitation, there are five seats of Provincial Assembly which were PK-44 to 48 but due to new census one seat of the Provincial Assembly has been abolished in Abbottabad District and now there are 04 seats which have given new names PK-36 to PK-39 and according to proposed delimitation Mouza/Patwar circle of Qanungo Halqa of Tanawal Orash and Mouza Havelian Tehsil were joined together and new Halqa PK-38 has been established, which is against the

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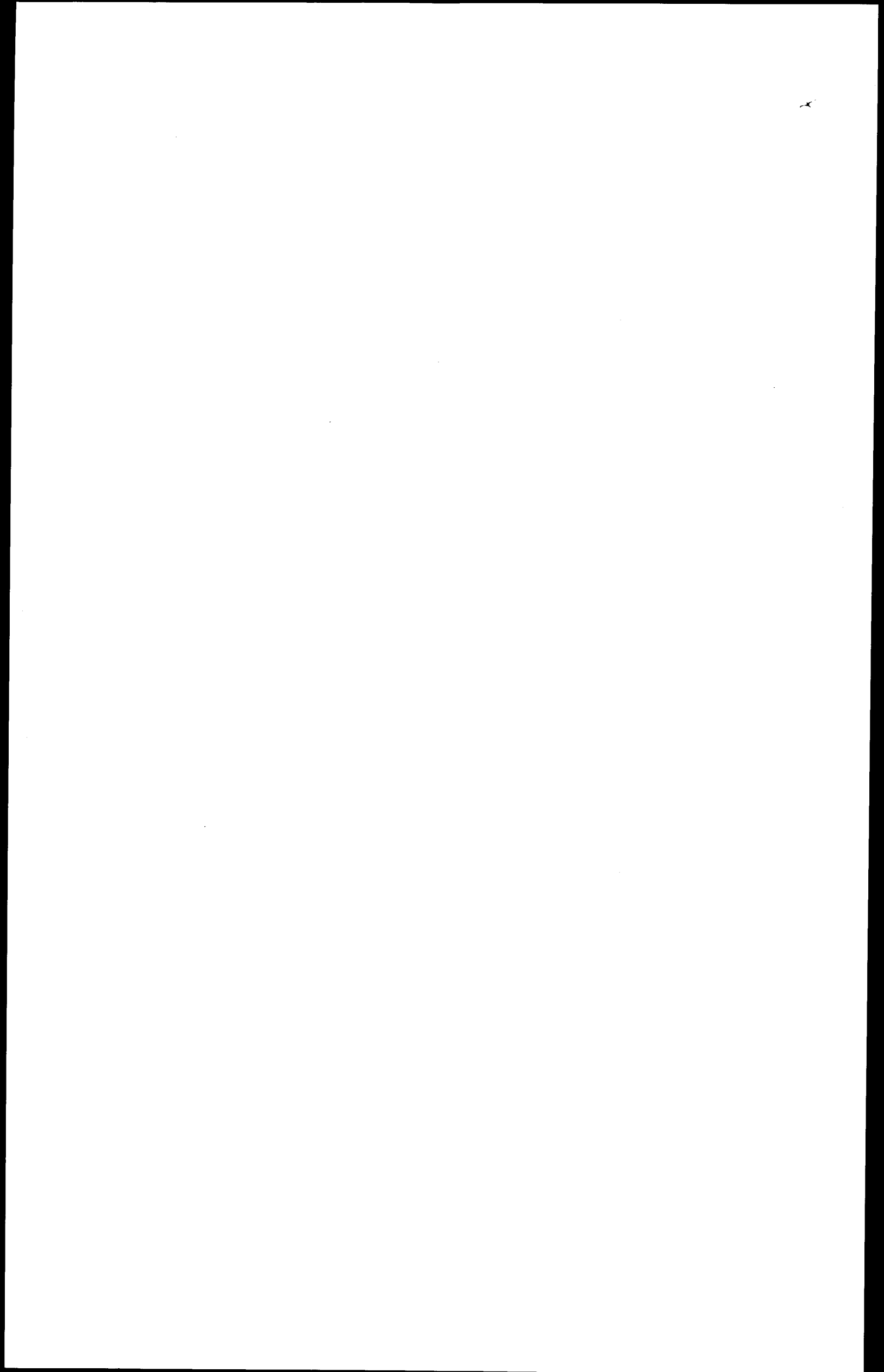
wills of the people of the Patwar Circle/Qanungo Halqa (1) Garhi Phulgran (2) Rajoya (3) Bandi Attai Khan (4) Langra-I (5) Langra-II (6) Phullan Wali and a clear discrimination heavy loss to the peoples of above mentioned Mouzas.

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5. That, the total population in District Abbottabad according to the census of 2017 is 13,32,912 in numbers and which has been divided into two seats of National Assembly and four seats of Provincial Assembly.

(Copy of census report of 2017 is attached as annexure "B").

6. That, exclusion of Patwar Circle Garhi Phulgran, Rajoyia, Bandi Attai Khan, Phullan Wali, Langra-I, Langra-II from PK-38 and inclusion of Patwar Circle Baldheri, Banda Qazi and Jhangi in PK-38 in the proposed delimitation is without any geographical and cultural compactness e.g. Tehsil Havelian including Havelian city has been divided into two parts, and one part of Havelian is included in PK-37 and rest of the area has been included in PK-38 which are not easily accessible. Similarly, divisions



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of main city of Havelian into two constituencies is not warranted under the law and facts also as all the population of Havelian city alongwith surrounding areas can easily be adjusted in PK-38 and Baldheri, Banda Qazi and Jhangi Patwar Halqa can easily be adjusted in PK-36 and this makes a well reasoned geographical units. All the above factors are not only inconvenient to the intended candidates but particularly public at large as more than 70,000 population is effected from the proposed delimitation.

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(Copy of the map of Abbottabad and proposed delimitation is attached as annexure "C" & "D").

7. That, in the proposed delimitation, PK-1 Chitral and PK-35 Torghar has been ignored due to their geographical location, administrative and communication problem.
8. That, this Honourable Commission can appoint local commission for physical inspection of the proposed delimitation of constituencies particularly area of Patwar Circle Garhi Phulgran, Rajoyia, Bandi Attai Khan, Phullan Wali, Langra-I and Langra-II.



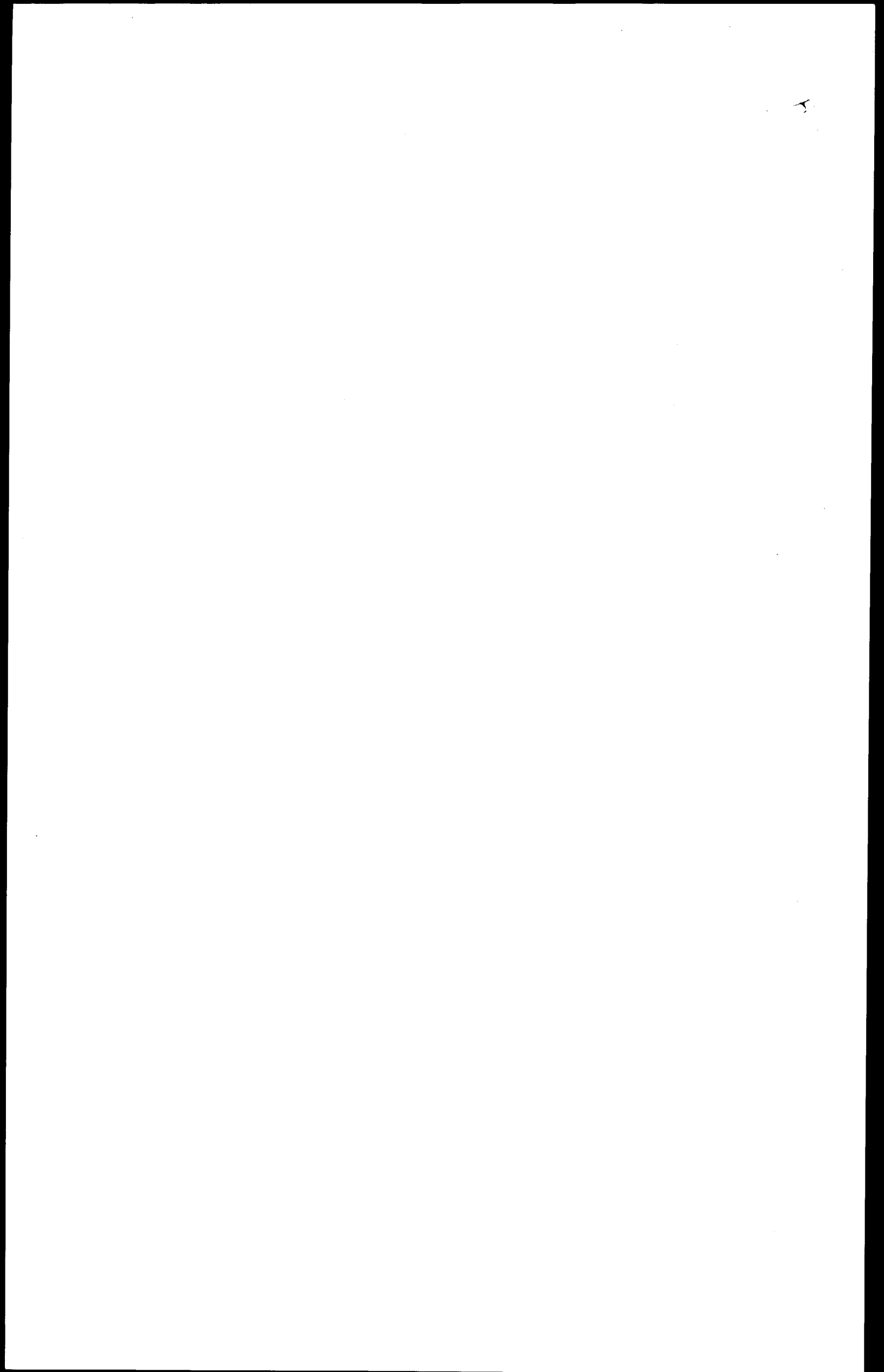
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9. That, the above-mentioned six Patwar Circles have population amounting to 70,000 and Havelian which is a Tehsil of District Abbottabad have a propriety rights to be included in PK-38 as the population of above-mentioned six Mouza Jats/Patwar Circles have their similar geographical and cultural compactness and are easily accessible through land and are also adjacent to each other whereas Baldheri, Banda Qazi and Jhangi can easily be excluded from PK-38 and can easily be included in PK-36 and similarly, Lora Tehsil can easily be excluded from PK-36 and can easily be included in PK-37 so that population of above-mentioned area and Patwar Circles can easily cast their votes on nearest polling station and can cast their vote and can elect their representatives according to their whims and wishes.

.....**PRAYER**.....

It is, therefore, most humbly prayed that on the acceptance of above-mentioned objections, Patwar Circles Garhi Phulgran, Rajoyia, Bandi Attai Khan, Phullan Wali, Langra-I and Langra-II may please be allowed to



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remain part of PK-38 Havelian instead of PK-37.

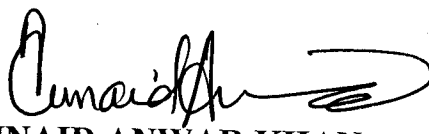
Dated 28.03.2018

1. Iftikhar Ahmed Khan son of Safdar Jang khan resident of union council Bandi Attai Khan.
2. Liaqat Maseekh son of Shafi Maseeh resident of
3. Mst. Jameela Bibi wife of Pervaiz Khan
4. Mst. Sabeela bibi wife of Shahnawaz Khan.
5. Sher Bahadar son of Sardar Bahadar
6. Nasir Ali son of Changez Khan.
7. Amir Khan son of Sorab Khan.
8. Umer Gul son of Rukan Zaman Khan.
9. Khan Bahadar Khan son of Aman Khan.
10. Chaudhry Rustam son of Sher Ali.
11. Naeem Gul son of Mamrez.
12. Abdul Rasheed son of Muhammad Zaman.
13. Bin Yamin Khan son of Allah Dad Khan.
14. Fareed Khan son of Channan Khan.
15. Zulfiqar Khan son of Ajab Khan.

All Residents of Bandi Attai Khan,
District Abbottabad.

16. Aurangzeb Khan son of Yaqoob Khan.
17. Mujeeb-ur-Reman son of Mughal Khan.
18. Aamir Khan son of Aslam Khan.
19. Faridoon Khan son of Umer Khan.
20. Haris Khan son of Abdul Malik Khan.
21. Mst. Lubna Bibi wife of Muhammad Aslam Khan.
22. Sagheer Ahmed son of Ali Bahadar Khan.
23. Saeed Akhtar Khan son of Sarfraz Khan residents of Garhi Phulgran, Tehsil and District Abbottabad.
24. Chaudhry Jehangir son of Mir Afzal Khan.
25. Aamir Shahzad Khan son of Safdar Khan.
26. Chaudhry Masood son of Chaudhry Matloob.
27. Chaudhry Misri son of Munsif residents of Langra-I, Tehsil and District Abbottabad.
28. Qari Shahzad son of Riasat.
29. Chaudhry Attique Ahmed son of Sher Ahmed residents of Langra-II, Tehsil and District AbbottabadObjectors.

Through


JUNAID ANWAR KHAN,
Advocate High Court,
Mansehra.

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10/09/2018

