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IN THE ELECTION COMMISSION OF PAKISTAN

Representation No. \_\_\_\_/2018

SUBJECT:- REPRESENTATION CUM OBJECTIONS IN TERMS OF SECTION 21 OF THE ELECTIONS ACT, 2017 R/W RULE 12 OF ELECTION RULES, 2017 FURTHER R/W ARTICLE 218 (3) OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.

The applicant most respectfully submits as under:-

1. That the applicant is a registered voter of Halqa Tappi, Tehsil & District Kohat now part of PK-82 and NA-32, as such, interested in democratic norms, election in the country, particularly in the delimitation of his own constituency, hence has a right to make representation and raise a voice against incorrect delimitation process.
2. That the above constituency is part of Khyber Pakhtoonkhwa, to National Assembly thirty nine general seats have been allocated for Khyber Pakhtoonkhwa in the forthcoming elections, whereas nine are meant for women. Similarly in Provincial Assembly ninety nine seats are allocated which are to be elected directly while twenty two and three seats have been reserved to women and the minorities respectively.
3. That the constituencies of National Assembly in Khyber Pakhtoonkhwa are based on some data which has recently been notified by this Commission, detail whereof is given below:-

NA	Constituency	Population
1	Chitral	447362
2	Sawat-I	735019
3	Sawat-II	783040
4	Sawat-III	791511

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5	Upper Dir	946421
6	Lower Dir-I	721322
7	Lower Dir-II	714595
8	Malakand Protected Area	721295
9	Buner	897319
10	Shangla	757810
11	Kohistan-cum-Lower Khostan-cum-Kolai Pallas Kohistan	784711
12	Batgram	476612
13	Mansehra-I	897373
14	Manshera—cum-Torghar	830482
15	Abotabad-I	649410
16	Abotabad-II	683502
17	Haripur	1003031
18	Sawabi-I	783155
19	Sawabi-II	841461
20	Mardan-I	794206
21	Mardan-II	794802
22	Mardan-III	784053
23	Charsada-I	812004
24	Charsada-II	804194
25	Noshehra-I	748777
26	Noshehra-II	769763
27	Peshawar-I	814036
28	Peshawar-II	851544
29	Peshawar-III	868205
30	Peshawar-IV	869685
31	Peshawar-V	865609
32	Kohat	993874
33	Hango	518798
34	Karak	706299
35	Bannu	1167892
36	Lakki Marwat	876182
37	Tank	319885
38	Dera Ismail Khan-I	818254
39	Dera Ismail Khan-II	808878

4. That similar detail in Provincial Assembly (KP) is given

below:-

PK	Constituency	Population
1	Chitral	447362
2	Sawat-I	290443
3	Sawat-II	288768
4	Sawat-III	291863

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5	Sawat-IV	301697
6	Sawat-V	287973
7	Sawat-VI	297219
8	Sawat-VII	276811
9	Sawat-VIII	274796
10	Upper Dir-I	309464
11	Upper Dir-II	321807
12	Upper Dir-III	315150
13	Lower Dir-I	298704
14	Lower Dir-II	270988
15	Lower Dir-III	302116
16	Lower Dir-IV	265273
17	Lower Dir-V	298836
18	Malakand Protected Area-I	370445
19	Malakand Protected Area-II	349850
20	Buner-I	326003
21	Buner-II	300156
22	Buner-III	271160
23	Shangla-I	387028
24	Shangla-II	370782
25	Kohistan	306337
26	Kohistan Lower	202613
27	Kolai Palas Kohistan	275461
28	Batgram-I	228886
29	Batgram-II	247726
30	Mansehra-I	310896
31	Mansehra-II	310163
32	Mansehra-III	300161
33	Mansehra-IV	311278
34	Mansehra-V	323962
35	Torghar	171395
36	Abotabad-I	319368
37	Abotabad-II	330402
38	Abotabad-III	321535
39	Abotabad-IV	361967
40	Haripur-I	326482
41	Haripur-II	344476
42	Haripur-III	332073
43	Sawabi-I	328300
44	Sawabi-II	330218
45	Sawabi-III	317820
46	Sawabi-IV	329211
47	Sawabi-V	319067
48	Mardan-I	295485
49	Mardan-II	307610
50	Mardan-III	295308
51	Mardan-IV	289112

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52	Mardan-V	290595
53	Mardan-VI	292448
54	Mardan-VII	302237
55	Mardan-VIII	300266
56.	Charsada-I	319711
57.	Charsada-II	326610
58	Charsada-III	326149
59	Charsada-IV	327071
60	Charsada-V	316687
61	Noushehra-I	314076
62	Noushehra-II	312702
63	Noushehra-III	307060
64	Noushehra-IV	291360
65	Noushehra-V	293386
66	Peshawar-I	296593
67	Peshawar-II	309422
68	Peshawar-III	317337
69	Peshawar-IV	315234
70	Peshawar-V	318510
71	Peshawar-VI	317912
72	Peshawar-VII	306432
73	Peshawar-VIII	288996
74	Peshawar-IX	299365
75	Peshawar-X	295046
76	Peshawar-XI	294498
77	Peshawar-XII	298857
78	Peshawar-XIII	297467
79	Peshawar-XIV	313410
80	Kohat-I	327419
81	Kohat-II	320477
82	Kohat-III	345978
83	Hangu-I	270295
84	Hangu-II	248503
85	Karak-I	358595
86	Karak-II	347704
87	Bannu-I	297697
88	Bannu-II	289647
89	Bannu-III	296212
90	Bannu-IV	284336
91	Lakki Marwat-I	293912
92	Lakki Marwat-II	285362
93	Lakki Marwat-III	296908
94	Tank	391885
95	Dera Ismail Khan-I	337865
96	Dera Ismail Khan-II	333260
97	Dera Ismail Khan-III	307264
98	Dera Ismail Khan-IV	329174

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99	Dera Ismail Khan-V	319569
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5. That reason to reproduce the details of para No.3 & 4 in this representation is to highlight many things unnatural, i.e. areas, population etc of some constituencies which are apparent by wrong on the face of record.

6. That for the purpose of this representation cum objections PK 82 is the subject matter in which namely Urban-6 has been included, previously this was PK-38 in the last elections of 2013, it is an urban area, as such, part of Municipal Committee Kohat, where Kohat Neighborhood council is also available which shows its urban character, it is situated just three Kilometer far from Kohat city but added with Tehsil Lachi 25 Km away from Kohat city, the area with which it is tagged has no nexus, on the basis of wrong maps this area has been made part of Lachi Tehsil which is to be detached from PK-82 and to be added in PK-81.

7. That in the circumstances, the petitioner being a registered voter of NA/ PK in question is aggrieved/ interested to correct the wrong made in preliminary delimitation to file this representation cum objection on the following amongst other grounds:-

#### GROUNDS

A. That till now the final census report has not been published, as such, the whole exercise appears to be premature.

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- B. That there are no similarities while making the constituencies in respect of areas and population, hence on this count too it is bad.
- C. That the maps of the constituencies prepared by this Commission have been supplied late besides are incorrect and do not tally with the maps of Survey department even it is not in consonance of Goggle maps, hence the commission may look into.
- D. That the criteria meant in the Election Act, 2017 and the rules have been ignored resulting miscarriage of justice.
- E. That an area namely Urban-6 has been wrongly included in the constituency PK-81 in question, though this area is not connected with the constituency PK-81 as has no similarities, infact the area is part of PK-82 as it was in it historically but due to wrong information is added in PK-81.
- F. That reasons to make the constituency would be the harmony between the local population and their convenience which principle has been violated while notifying the preliminary constituencies, hence required to be corrected.

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It is, therefore, respectfully prayed that preliminary delimitation may be revised the area "Urban-6" may be separated from PK-81 Kohat and be added in PK-82 Kohat with any other relief as deem fit and proper in the circumstances of the matter in the interest of justice.

  
DATED: 27/03-2018

  
APPLICANT  
MUMTAZ TARIQ