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BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN

Muhammad Iqbal S/O Khan Zaman r/o Dhoke Fateh Tehsil & District Attock.

REPRESENTATION UNDER SECTION 20 & 21 OF THE ELECTION ACT, 2017 (ACT NO. XXXIII OF 2017) AGAINST PRELIMINARY DELIMITATION REPORT OF PP-1, PP-5 AND NA-55

Respectfully submits that:-

The undersigned is resgistered as voter at Sr. No. 87 Electrol Block No. 101050302 Sarwar Road Mohallah Nasir Abad Attock PP-1 and NA-55, thus is entitled to file this representation/proposal on account of serious drawbacks in the list of constituencies notified by the honorable commission vide notification no. F8 (3)/2018 Dated 05 March 2018. Drastic changes have been made in former boundaries of constituencies ignoring violently the principle of delimitation laid down under the relevant law:

(20) Principles of Delimitation:-

- (1) All constituencies for general seats, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.
- (3) As far as possible, variation in population of constituencies of an Assembly shall not ordinarily exceed 10%.

It appears that none of the aforementioned principles of delimitations have been followed by the delimitation committee. Following drawbacks in the new constituencies plan are pointed out for correction:-

- (1). Administrative units: is a pre-requisite for delimitation of constituencies but all the administrative units (QH and Tehsils) have been pronged into different constituencies, unwontedly.
- (2). Geographic Compactness: The areas assigned to the constituencies are not compact and contiguous.

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- (3). Physical Features: Areas having different features have been tagged in constituencies.
 - (4). Means of Communication: means of communication have been totally ignored.

 The instances of such grave violations of principles of delimitation are given:-
 - (1) PCs chhoi garyala and suragsalar lie in QH 1 of Tehsil Attock and are not connected to PCs of Boota & Akhori of QH II of Tehsil Attock. Both are allocated to PP-5 which is at least 40 kilometers away through mountainous area and no transport rout between either of them or between PCs and PP-5 (Tehsil Jand).
 - (2) There lies PCs Mari kanjoor between these 2 groups of PCs and both have to travel Attock (District Headquarter) to be eventually connected to each other.
 - (3) The administrative units of QH & Tehsils are bifurcated against the law of delimitation and would cause huge problems for voters.
 - (4) The distance covered by residents of PCs Boota & Akhori to reach Jand is even longer i.e 60 Km to 80Km (hilly area).
 - (5) The only linked road of these PCs and Tehsil Jand is under the control of Ministry of Defense having strict and time consuming checking and blockage during VIPs movement.
 - (6) PCs of (QII Burhan Tehsil Hassan Abdal) Khuda, Islam Garh and Kohlia are not connected conveniently to Tehsil Hazro PP-II.
 - (7) Keeping in view the above mentioned facts PCs (Boota, Akhroi, Surag Salar) should not be included in NA-56 as well. They are Part of Tehsil Attock and be included in NA-55. NA-55 Should be comprised of Tehsil Attock, Tehsil Hazro and Tehsil Hassan Abdal having total population of 9,90,509 which does not exceed 10% permitted variation, making it a compact area and workable for both the voters and candidates.
 - (8) NA-56 already comprises of very vast area (sea the map) and need not to be allotted geographically four very very different and far off PCs just to make population of both constituencies equal. So NA-56 may kindly be comprised of Tehsil Fateh Jang, Tehsil Pindi Gheb and Tehsil Jand, as neither the voters nor the political parties have any objection in doing so.

GROUNDS

- (1) That in conducting the delimitations of constituencies of PP-1 and PP-5 the provisions of the act XXXIII 2017 are ignored
- (2) If the proposed delimitation is finalized and not brought to proper position, the population of Tehsil Attock, Tehsil Jand and Hassan Abdal will definitely face hindrance and difficulties in their representation.
- (3) That it is reiterated that the proposed delimitation to the extent of exclusion of PCs Boota, Akhori, Surag Salar, Chhoi Garyala of Tehsil Attock & Khuda, Islam Garh, Kohila of Tehsil Hassan Abdal create great inconvenience and hardship in selection of their representatives during election as it will always be in lack of interest and of hardly any importance to either side (i.e. the elector and the voters). Resultantly the true representation will always be defective and neglected which is against all norms of democracy and is against the relevant provisions of the Constitutions of the Islamic Republic of Pakistan, 1973 and section 20 of Act XXXIII of 2017.
- (4) That the population of above mentioned PCs and Political elite both have unanimously decided that they are not willing to be included in PP-5 of <u>Tehsil Jand</u> and PP-2 of Tehsil Hazro respectively because of the hardships to be faced by the population in future in case they are included in said constituencies.
- (5) That if the proposed delimitation is finalized, it would create great hardship and would deprive them of basic facilities. Because the police stations, post offices, hospitals, drinking water Supply system, basic health units, revenue circles, school colleges and universities all lie in Attock and Hassan abdal respectively.
- (6) That any other additional grounds will be raised at the time of arguments with the prior permission of this Honorable Forum.

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SUGGESTION

A revised proposal for delimitation of all the constituencies for the entire district as required under the law is submitted (Attached with this documents) for constituencies under the relevant laws with the request to set aside the delimitation proposed by the delimitation committee and proposal submitted by the undersigned may graciously by ordered to be implemented for the sake of democratic values. Any other relief which this Honorable Forum deems fit and proper may also be granted.

Applicant

Muhammad Iqbal

S/O Khan Zaman

r/o Dhoke Fateh

Tehsil & District Attock

0333-5956090

Dated: 2 April 2018

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