

Waseem

**BEFORE THE CHIEF ELECTION COMMISSIONER, ELECTION
COMMISSION OF PAKISTAN ISLAMABAD**

Waseem Iqbal Advocate s/o Muhammad Iqbal r/o House No. 909 sector 1
Khalabat Township Tehsil & District Haripur CNIC # 13302-0344266-1
voter of proposed constituency PK-40 Haripur-I voter 480 block code
026060107, Cell No. 03365896116. *(Voter certificate will be
produced at the time of arguments)* *Waseem*

.....OBJECTOR/ PETITIONER

**REPRESENTATION / MEMORANDUM OF OBJECTIONS U/S 21
(3) OF THE ELECTION ACT, 2017 READ WITH RULE 12 OF THE
ELECTION RULES, 2017 FOR AMMENDMENT, ALTERATION
AND MODIFICATION IN PRELIMINARY LIST OF
CONSITUENCIES FOR PK-40, PK-41 AND PK-42 OF DISTRICT
HARIPUR PUBLISHED U/S 21(1) OF THE ACT.**

Respectfully sheweth:-

1. That the objector submitting the instant representation / memorandum of objection is the permanent resident of Tehsil & District Haripur and a registered voter of proposed constituency of PK-40 Haripur-I thus the objector have got locus standi under the law to raise objections over the preliminary constituencies list published u/s 21(1) of the Act.
2. That the objector has minutely observed the preliminary constituency list with the yard stick of statutory mandatory requirements for delimitation process i.e 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. That the objector through instant representation submits his objections on the preliminary list of constituencies for PK-40 and PK-41 on the following grounds:

GROUND S:-

- a. That the preliminary list of constituencies for PK-40, PK 41 and PK-42 lacks the statutory and mandatory essentials of geographically compact area, administrative control, facilities of communication and convenience of the public.
- b. That the Haripur district consist upon three Tehsils i.e. (1) Haripur (2) Ghazi and (3) Khanpur having total population about 1003031 out of which Tehsil Haripur makes 671072 population, Tehsil Ghazi makes 145467 population whereas Tehsil Khanpur makes 186492.
- c. That Tehsil Khanpur and Tesil Ghazi are lying on the boundaries of District Haripur i.e. on east side is Tehsil Ghazi and on the west side is Tehsil Khanpur whereas Tehsil Haripur is lying in between both the above the mentioned Tehsils.
- d. That the proposed constituencies of PK-40, PK-41 and PK-42 does not make proper and compact block as per requirements of law.
- e. That if Patwar circles Dheendha and Jagal excluded from PK-40 and included into PK-42 and Patwar circles Malikyar and Patwar circle Haripur

excluded from PK-42 and be included into PK-41, it will make a compact block of PK-40 having population of 343847.

- f. That similarly after excluding Patwar circles Chamba Pind, PC Dehdan, PC Kot Najibullah, PC Sarai Gadai and PC Mang from PK-41 and included into PK-42 whereas from PK-42 the MC Haripur to be excluded and to be included into PK-41 then it will make compact block of each constituency i.e. PK-41 and PK-42 having population 344154 and 315398 respectively by this all the constituencies will become a compact block, which will meet the required population of each constituency as well as it will meet the geography, convenience and other cognate factors set forth under the law.
- g. That this proposal is also shown in the color map along with population saturation chart of PK-40, PK-41 and PK-42 which is annexed herewith and marked as "A". List of Patwar circles along with population is annexed as "B".
- h. That this representation is well within time and this Hon'ble Commission has got jurisdiction to entertain the same.
- i. That the other grounds will be urged at the time of arguments.

In the light of above, it is humbly prayed that by accepting the instant representation the preliminary constituencies list for PK-40, PK-41 and PK-42 may graciously be amended, altered and modified according to the objection raised in the instant representation / memorandum of objection in the larger interest of public at large. Any other relief this Hon'ble commissioner deems fit may also be granted.

Haripur

OBJECTOR / PETITIONER

Dated: 02-04-2018

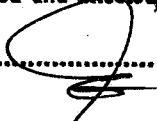

WASEEM IQBAL Advocate

Verification:

It is verified on oath that the contents of instant memorandum of objection / representation are true and correct to the best of my knowledge and belief and nothing material has been concealed therein.


OBJECTOR / PETITIONER

This affidavit has been sworn before me on this02... day of04... 20 / 18..... by the deponent who is personally known / identified by Waseem Iqbal. Certified further that the deponent of this affidavit have been read over and explained to deponent who has understood and attested the same.
Serial No


Irshad ul-Haq
Advocate High Court
Oath Commissioner
Islamabad

Per

**BEFORE THE CHIEF ELECTION COMMISSIONER, ELECTION
COMMISSION OF PAKISTAN ISLAMABAD**

REPRESENTATION / MEMORANDUM OF OBJECTION

AFFIDAVIT

I, Waseem Iqbal, Advocate s/o Muhammad Iqbal r/o House No. 909 sector I Khalabat Township Tehsil & District Haripur CNIC # 13302-0344266-1 voter of proposed constituency PK-40 Haripur-I voter 480 block code 026060107. Cell No. 03365896116 today 2nd of April, 2018 at Islamabad do hereby solemnly affirm and declare on oath that the contents of forgoing representation / memorandum of objection are true and correct to the best of my knowledge and belief and nothing material has been concealed from this Hon'ble commission.

Waseem Iqbal
DEPONENTS

This affidavit has been sworn before me on this 02nd day of April 20 18 by the deponent who is personally known / identified by Waseem Iqbal. Certified further that the deponent of this affidavit have been read over and explained to deponent who has understood and attested the same
Serial No

Irshad ul Haq
**Irshad ul Haq
Advocate High Court
Oath Commissioner
Islamabad**