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BEFORE THE ELECTION COMMISSION OF PAKISTAN/
ELECTION TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Objection Petition No. _____/2018

Syed Jamil Shah S/o Syed Suleman Shah r/o Akbar Pura Tehsil Pabbi
and District Nowshera

REPRESENTATION / OBJECTION PETITION REGARDING
DELIMITATION OF CONSTITUENCY PK 69 U/S 21 R/W RULE 12
OF ELECTION ACT 2017 AND RULES FRAMED THERE UNDER

Respectfully Sheweth

1. That the petitioner is a social and political activist. Many times he contested election in his constituency, particularly in the local election and secured good position through constituency.
2. That due to 2017-18 delimitation conducted by Hon'able Election Commission of Pakistan the constituency has been changed and renumbered and now constituency of the petitioner is PK 64 and previously it was PK 12 KPK having total population of 291316. (Copy of Draft Delimitation by ECP for PK 64 is attached as annexure A)
3. That previously the petitioner's village Akbar Pura (Shindi Payana Patwar Circel) was part and parcel of PK 12 now PK 64, and as per the recent rules frame under the Act ibid 2017 the clockwise delimitation process has to be adopted, starting

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from north of the District i.e clockwise, but in the case of petitioner the said rule was not adopted rather a confused and unexplained division / delimitation process was conducted by disturbing materially changed and size of voters / population of the constituency and has been shifted to a far flung area beyond the domain and approach of petitioner / voters and contested candidate of the constituency.

4. That as a matter of fact, the petitioner propose the following durable suggestions to remove the difficulties and agonies of the local population and to ensure the active participation of local population without any mental agony and accordingly in clockwise formula, settled by the Election Commission of Pakistan rules 2017 read with Election Act 2017

PROPASAL No. 1.

According to Petitioner's proposal all the adjacent PC with naturally and geographically connected PC having its total population 290770 validly constitute PK 64 would be implemented (Copy of Propose Site Plan explaining view point of petitioner is attached as annexure B and proposed delimitation population for PK 64 is attached as B/1)

PROPOSAL NO. 2

Similarly petitioner invites the kind attentions of this Honorable Election Commission of Pakistan towards the 2nd proposed delimitation for PK 64 consisting of following Patwar Circle of Tehsil Pabbi having total population 290309 as explained in a proposed plane No.2 attached as annexure "C", with corresponding Population Description as annexure "C-1")

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5. That the above mentioned proposed list and suggestions of the petitioner would definitely streamline the whole scheme and constituency and also shall remove all relevant problems faced by the local populations

It is therefore prayed that on acceptance of instant representation the above mentioned suggested changes may graciously be allowed and added in the constituencies of the District Nowshara

S. Jamil shah

Petitioner

Ghulam Mohy ud Din Malik
**Ghulam Mohy ud Din Malik,
Advocate
Supreme Court, of Pakistan**

Dated 3.04.2018

VERIFICATION

It is verified on oath on this 3rd of April 2018 that the contents of this petition are true and correct to the best of my knowledge and belief

S. Jamil. shah

Petitioner

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