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BEFORE THE ELECTION COMMISSION OF PAKISTAN
(Through Secretary Election Commission of Pakistan)

REPRESENTATION UNDER SECTION 21(3) FOR
AMENDMENT TO THE PROPOSED PROVINCIAL
ASSEMBLY CONSTITUENCIES OF DISTRICT
PESHAWAR (URBAN) IN PARTICULAR THE
PROPOSED CONSTITUENCY PK-77 PESHAWAR-
XII AS PUBLISHED IN THE DRAFT LIST OF
CONSTITUENCIES

Respectfully Sheweth;

The essential facts necessitating this representation are:

FACTS:

1. **That** applicant is permanent resident of Peshawar bearing CNIC number 17301-0657751-1, and is enrolled as voter enrolled as Voter No. 19, Book No. 037136065 Quaid Abad No. 2 Peshawar
2. **That** in the draft list of constituencies as finalized and published under Section 21 of the Election Act, 2017 read with Rule 10(7) and 11 of the Election rules the applicant falls in PK 75 PESHAWAR X in of the Draft list of constituencies. In the published list of constituencies, the Cenus Charge 13 Circle 06 has been included in the preliminary PK 75. The entire Charge 13 including Census circle 06 was earlier part of the former constituency of PK-3.
3. That the inclusion of the applicant and the census circle to which he belongs in the preliminary/draft PK-75 cause inconvenience to the public, breaks the Census Charge and distributes geographically compact and coherent areas in different constituencies, thus prefers this representation on the following grounds:

GROUNDS



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- A. **Because** the proposed constituency PK 78 PESHAWAR XIII has been drawn without adhering to the principles of delimitation as enunciated in Section 20 of the Election Act, 2017 read with Rule 10 of the Election rules 2017.
- B. **Because** the entire Charge 13 is included in the preliminary/draft PK-78 and only the census circle 06 has been made part PK-75. The breakup of this charge is unnecessary, unwarranted and disturbs the hitherto cohesive community in two different constituencies.
- C. **Because** Kohat Road in the major road inside the city which makes a natural boundary separating the proposed constituencies, PK 78 and PK 75. The entire area of the Charge No. 13 is located on the left side of the Kohat road which was the natural boundary separating the former constituencies of PK 4 and PK 5 as delimited. Even before the said delimitation in year 2002, Kohat road remained the boundary dividing two urban constituencies of Peshawar. Considering compactness, proximity and the physical features of the area the aforementioned census circle remained part of the former PK-3 constituency of Peshawar. Thus the exclusion of the aforesaid census circle from PK 78 and its inclusion in PK 75 is unjustified and against the principles of delimitation.
(Reference is made to the maps annexed herewith marked – A (map obtained from Election Commission & B- as proposed by applicant)
- D. **Because** Charge No. 13 was earlier part of the former constituency. In the draft constituency Census Circle No. 06 has been excluded from the constituency. The same census circle includes Quaid Abad No. 1, Quaid Abad No. 2, Mehmood Abad, Qasim Abad No. 1, 4 & 5 and Muslim Abad No. 1 & 4, Mohalla Mian Ghulam Jilani Nagri, Fazal Elahi Colony areas which lies on the circular road in front of the historical city wall (*Faseel-e-Shehr*). These are compact areas inseparably connected through the Circular Road which is the main road running through the draft/preliminary PK-78 Constituency. In the earlier delimitations the community inhabiting the area was part of one and the same constituency.

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E. **Because** the areas comprising Charge No. 13 including its Census Circle No. 06 are administratively part of Municipal Administration Town 1, Peshawar, and have been clubbed with constituencies making part of Municipal Administration Town III Peshawar and the Peshawar Cantonment in the preliminary list of constituencies. These anomalies along with the reasons aforementioned add to miseries and difficulties to the general public inhibiting these areas.

F. **Because** the exclusion of Census Circle NO. 06 of Charge 13 doesn't affect the population distribution and remains within the permissible variation limits set in the ELECTION RULES, 2017, and this alteration in the constituency ensures cohesion of community and caters to the needs of public thus the variation as prayed for in the representation merits acceptance by the honorable Election Commission.

IN VIEW OF THE ABOVE CENSUS CHARGE 13 CIRCLE 06 MAY KINDLY BE EXCLUDED FROM PROPOSED PK 75 AND INCLUDED IN PK 78. IN VIEW OF THIS THE PROVINCIAL CONSTITUENCIES PK 78 AND PK 75 OF DISTRICT PESHAWAR (URBAN) MAY BE DELIMITED IN THE FOLLOWING MANNER:

(Note: This representation and the proposed delimitation of PK 78 affects PK 75, and doesn't affect any other constituency in the District, thus only these two constituencies are given, the rest of constituencies may kindly be deemed as proposed in the preliminary list of constituencies.)


PK 78 Peshawar XIII

- a) Charge NO. 10 of Municipal Corporation
- b) Charge NO. 11 of Municipal Corporation
- c) Charge NO. 12 of Municipal Corporation
- d) Charge NO. 13 of Municipal Corporation

Total Population in the proposed PK : 317723

PK 75

- a) Peshawar Cantonment excluding Census Circle NO. 4 & 06 of Charge 1
- b) Charge No. 15 of Peshawar Municipal Corporation

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c) The following census circles of charge No. 16 of Peshawar Municipal Corporation:

- i) Census circle No. 1 (nauthia jaded)
- ii) Census circle No. 2 (Nauthia Jadeed)
- iii) Census circle No. 3 (landi arbab)
- iv) Census circle No. 04 (Charkhana)
- v) Census circle NO. 05 (Charkhana)
- vi) Census Circle No. 06 (Charkhana)
- vii) Census Circle No. 07 (Charkhana)
- viii) Census Circle No. 08 (Nauthia payan)

Total Population in the proposed PK : 275790

Census data from Pakistan Bureau of Statistics is annexed herewith marked – C

As stated hereinabove, the other constituencies of District Peshawar (Urban) remain the same as published in the preliminary list of Constituencies.

PK-75

a) Peshawar Cantonment Excluding Circle No.4& 6 of Charge No.1 (70,741-12,638=58,103)
58103

b) Charge No.07	
Circle No. 14	18,070
Circle No. 15	10,062
Circle No. 16	11,843
c) Charge No. 15EX.Cir.1 (105283-15980=89303)	89303

d) The Following Census circles of Charges No. 16 of Peshawar MC.

Circle No. 1	16,430
Circle No. 2	11,623
Circle No. 3	8,760
Circle No. 4	8,607
Circle No. 5	19,514
Circle No. 6	13,807
Circle No. 7	17,913
Circle No. 8	14,750
Total	298,785

PK-76

a) Census Charges No. 07 of Peshawar MC. Excluding the following Census Circles; Circle No.01,02,14,15, & 16 (383985-92812=291173)	
Circle No. 3	
Circle No. 4	20,525
Circle No. 5	20,412
Circle No. 6	22,240
Circle No. 7	15,132
Circle No. 8	11,845
Circle No. 9	18,143
Circle No. 10	9,055
Circle No. 11	15,688
Circle No. 12	25,606
Circle No. 13	18,839
Circle No. 17	32,360
Circle No. 18	30,772
Circle No. 19	24,947
Circle No. 20	17,572
Circle No. 21	9,308
Circle No. 22	17,140
Total	319,282

PK-77

a) The following Census Circles of Charge No.07	
Circle No. 1	
Circle No. 2	9,716
b) The following Charges of Peshawar MC	15,012
i. Charge No. 8	
ii. Census Charges No. 9	40,113
Census Circle No. 10	169,257
c) Census Circle No. 1 of Charge No. 12	37,550
d) The following Census Circles of Charge No. 14	4,309
Circle No. 1	
Circle No. 2	14,691
Total	302,166

PK-78

a) Census Charges No. 11	28,112
b) Census Charges No. 12 ex. CIR-01 45469-4309=41160	41,160
c) Census Charges No. 13	206,592
d) CIR. 01 of Charge No. 15	15,980
Total	291,844

PK-79

a) Census Charges No. 14 ex.	192,111
Circle No. 01=14,691	
Circle No. 01=11,518	
218320-26209=192111	

b) The following PCs of Badhbair QH

AHMAD KHEL	23,402
BAZID KHEL	18,525
DEH BAHADUR	12,135
MUSA ZAI	19,152
UTMAN ZAI	21,876
Total	287,201

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PK#	NOTIFIED BY ECP	PROPOSED
PK-66	296593	296593
PK-67	309422	309422
PK-68	317337	317337
PK-69	315234	315234
PK-70	318510	318510
PK-71	317912	317912
PK-72	306432	306432
PK-73	288996	288996
PK-74	299365	299365
PK-75	295046	298785
PK-76	294498	319282
PK-77	298857	302166
PK-78	297467	291844
PK-79	313410	287201
TOTAL	4269079	4269079

It is therefore prayed that on acceptance of the instant representation in view of the above the delimitation of the provincial constituencies of District Peshawar (Urban) may kindly be delimited as proposed in this representation.



Zarak Khan Orakzai

S/O Alamgir Khan Orakzai

R/O Quaid Abad No. 2 Kakshal, Peshawar

CNIC NO 17301-0657751-1

CELL NO. 0313 8844368