

1

**BEFORE THE WORTHY ELECTION COMMISSION OF**  
**PAKISTAN ISLAMABAD.**



Sajjad Hussain S/o Malik Muhabbat, R/o Village Mohallah Qazi Shaib Village  
Dhamtour, presently Nazim Village Council Dhamtour-I.

... PETITIONER

---

---

***REPRESENTATION / OBJECTIONS:***

AS PER ELECTION ACT AND RULE TILL  
AMENDED UPTDATE. TO THE DRAFT PROPOSAL  
IN RESPECT OF PK-36, PK-37, PK-38, PK-39 AND  
OF DISTRICT ABBOTTABAD PROVINCE OF KPK.

---

---

**PRAYER:-**

ON ACCEPTANCE OF THE PRESENT  
REPRESENTATION / OBJECTION DRAFT

PROPOSAL IN RESPECT OF PK-37, PK-39 PK-38  
 AND PK36 MAY GRACIOUSLY BE MODIFIED AND  
 SET ASIDE AND CONSTITUENCIES MENTIONED  
 MAY PLEASE BE NOTIFIED<sup>IED</sup> AS PER PROPOSAL BY  
 THE PETITIONER ACCORDING TO LAW AND  
 ADMINISTRATION OF JUSTICE.

---



---

*Respectfully Sheweth,*

*That the petitioner seeks the redressal as mention in  
 title on the following facts and grounds.*

1. That the petitioner is a voter in a proposed PK-37 in Patwari Circle Dhamtour (I) and is also Nazam of the village council Dhamtour (I) and the public at large. In the village council unanimously passed resolution. *(Copies National Identity Card alongwith certificate of voter list of petitioner and resolution dated 01.03.2018 is Annexure "A", "B" & "C" respectively)*
2. That the surrounding village council Gul Dhoak of Union Council Dhamtour. Nazim of the Gul Dhoak on the serious apprehension of public also possessed



resolution for the modification. *(Copy of the resolution of Village Council Gul Dhok is annexed as Annexure "D")*

3. That surprising enough village Dhamtour since long as union council and being village councils comprising of five village council always remind with Abbottabad as being neighboring village of the Abbottabad city and all type of life interest always remind with the Abbottabad city but now without working on the aspects as being critical area, population, social exercise, and vice versa and also ignoring the population of village Dhamtour the Dhamtour has been made / added in the area of PK-37 which will definitely result into the political, daily, <sup>u</sup>retain matter and socio economic, voting public political presentation and vice versa problems. The proposed marked map / proposed constitutes map that there is no increase and decrees in the Provincial Assembly seat. *(Copy of the Old Map through which the constitutes are defined before the p<sup>r</sup>o<sup>v</sup>posed marked map is annexed as Annexure "E")*

4. That the overall look of the proposed marked map its self support the contention of petitioner village Banda



Pear Khan has there whose population is 12,153 as per population and house hold list as per District level is reveal if Banda P<sup>in</sup> Khan is deleted from PK-39 and added either to Pk-38, whose neighboring village is Bhaldheri or to PK-36 whose neighboring village are Bhendi Dhoundha and Tarnawai and all the said four villages has always been remain one and same and part and parcel of one constituency while Dhamtour-I whose population is 13,007 is if added in the constituency of PK-39 as village Dhamtour and village Nawansher had either one patwari circle or adjacent patwari circle. *(Copies of the marked map and proposed delimitation map is annexed as Annexure "F", "F-1" and population and house hold detail block to distributing level is annexed as Annexure "G")*

5. That the proposed delimitation of the constituency PK-36, 37,38 and 39 may kindly be modified inter-alia at the following grounds:-

**GROUND:**

- a. That the preliminary report of KP-36, 37,38 and 39 is void unlawful beyond to authority not



compatible with the interest of any type including, <sup>not</sup> as per the people representation Act hence not sustainable thus bound to be struck down.

- b. That in said preliminary report no opportunity of being heard is extended to the public i.e. VC Dhamtour-I and others.
- c. That village Dhamtour-I is the surrounding village of Abbottabad city and all type of including daily lively hood and other utility services are being delt <sup>in</sup> the Abbottabad city and village Dhamtour is only at the distance of Abbottabad which is about 10 to 20 mints.
- d. That people of village Dhamtour-I and other surrounding have never been in relationship of any type with PK-37 such preliminary report if will not be modified as mentioned and present then it would mean people of Islamabad are compelled to join hands with the village council of Khanpur as the areas from many boundaries are adjacent to each other and if the same formula is found not applicable in case of Islamabad and Khanpur then

public at large of VC Dhamtour should hence not been <sup>a</sup>dealt as the preliminary report and map suggested.

- e. That other routine life has been made so merged to the other life affairs as need of member of Provincial Assembly if are needed urgently to meet the urgent demand of VC Dhamtour-I then it would be impossible.
- f. That the village Band per Khan mention in preliminary report and map has never been remained part and parcel of the arias of the PK-39 <sup>as</sup> the public of Banda Pear Khan it would be sure fusible to share hand with their own drives man either with village Bhaldari showing in PK-38 or with village Bandi Dhoundhan and Tarnawai <sup>PK-36</sup> having same, common and daily life affairs.
- g. That any procedural defect may please not <sup>be</sup> made the hurdle in the way of redressal as prayed for and such defect if any may graciously be condone<sup>d</sup> in the interest<sup>s</sup> justice.

It is therefore, prayed that on acceptance of present petition / objection presentation the area of the village council Dhamtour-I may graciously be included and added in PK-39 / old PK-44 by deleting the area in village of Banda P<sup>iv</sup> Khan as mentioned in the subject of representation.

  
... PETITIONER  
Sajjid Hussin

Through counsel

Dated: - 3/4 /2018

  
(SULTAN AHMED JAMSHEED)  
ASCP

  
(HAFIZ MUHAMMAD BILAL)  
Advocate

**VERIFICATION:-**

Verified that the contents of the instant **petition/ objection representation** are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Court.

Dated: - 3/4 /2018

  
... PETITIONER  
SAJJID HUSSIN



**BEFORE THE WORTHY ELECTION COMMISSION OF  
PAKISTAN ISLAMABAD.**

Sajjad Hussain

... PETITIONER

V E R S U S

Election Commission of Pakistan and others

...RESPONDENTS

**PETITION**

**AFFIDAVIT**

I, *Sajjad Hussain S/o Malik Muhabbat, R/o Village Mohallah Qazi Shaib Village Dhamtour, presently Nazim Village Council Dhamtour-I appellant / petitioner*, do hereby solemnly affirm and declare on Oath that the contents of instant *Appeal* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

Dated:- 3/4 /2018

  
 ...DEPONENT

**IDENTIFIED BY:**



(SULTAN AHMED JAMSHEED)  
A S C P.

&



(HAFIZ MUHAMMAD BILAL)  
Advocate



  
**BEFORE THE WORTHY ELECTION COMMISSION OF**  
**PAKISTAN ISLAMABAD.**

Sajjad Hussain

...PETITIONER

V E R S U S

Election Commission of Pakistan and others

...RESPONDENTS

**PETITION**  
**CERTIFICATE**

*Certified that no such like Appeal has earlier been filed before  
this Hon'ble Court.*

  
...PETITIONER  
Sajjid Hussain

*Through counsel*

Dated:- 3/4 /2018

  
(SULTAN AHMED JAMSHEED)  
ASCP

  
(HAFIZ MUHAMMAD BILAL)  
Advocate