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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 PRELIMINARY/DRAFT
PROVINCIAL ASSEMBLY CONSTITUENCIES
PK-64 AND PK 65 OF DISTRICT NOWSHEHRA
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 Nowshehra bearing CNIC number 17201-3652941-9, and is enrolled as voter in Tarkha, Tehsil Pabbi District Nowshehra
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 64 Nowshehra IV in of the Draft list of constituencies. In the published list of constituencies, Patwar Circle Tarkha has been included in the preliminary/draft PK 64. This PC was earlier part of the former constituency of the former PK 12 constituency, now PK-65 in the draft list of constituencies.
3. **That** the inclusion of the applicant and the PC to which he belongs in the preliminary/draft PK-65 cause inconvenience to the public and distributes geographically compact and coherent areas in different constituencies, thus prefers this representation on the following grounds:

GROUND

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A. **Because** the proposed constituency PK 64 and PK 65 have 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 Patwar Circle Tarkha made part of the draft PK-64 makes a pocket in another constituency. There are no access routes from the said constituency to this Patwar Circle. The only access route is through GT Road near Pabbi which makes the heart of the draft/preliminary PK-65 constituency.

(Reference is made to the maps annexed herewith marked – A (map obtained from Election Commission & B- as proposed by applicant)

C. **Because** PC Tarkha (divided into two Mozas i.e. Tarkha and Ali shah) was earlier part of the PK-12, now preliminary/draft PK-65 Constituency. Population of the PC is dependent on Pabbi, which is the Tehsil Headquarter of Tehsil Pabbi. The economic, social and political relations of the people are inseparable from Pabbi and the proposed Pk-65 constituency.

D. **Because** PC Tarkha has a small population of 7662 and the inclusion of PC in PK 65 doesn't affect the population distribution in the constituencies as permissible under the rules. Population distribution of these two constituencies in the preliminary delimitation is:

- a) PK-64 291316
- b) PK 65 293386

As per the proposal in this representation the population distribution comes at:

- a) PK -64 283654
- b) PK-65 301048

IN VIEW OF THE ABOVE PATWAR CIRCLE TARKHA MAY KINDLY BE EXCLUDED FROM DRAFT/PRELIMINARY PK 64 AND INCLUDED IN PK 65. IN VIEW OF THIS THE PROVINCIAL CONSTITUENCIES PK

78 AND PK 75 OF DISTRICT PESHAWAR (URBAN) MAY BE
DELIMITED IN THE FOLLOWING MANNER:

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PK 64:

The following Patwar Circles of Nowshehra Qanungu Halqa of Nowshehra
Tehsil:

A)

- i) Azakhel Bala
- ii) Azakhel Payan
- iii) Shekhi
- iv) Manki Sharif
- v) Tangi Khattak
- vi) Walai-I
- vii) Walai-II
- viii) Pir Pai

B)

The following Patwar Circles of Pabbi Qanungu Halqa of Pabbi Tehsil

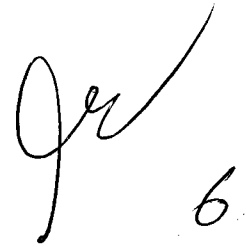
- i) Amankot
- ii) Chowki drab
- iii) Banda Mohib
- iv) Banda Sheikha Ismail
- v) Banda Nabi
- vi) Dagai
- vii) Jabba Daudzai
- viii) Ghari Momin
- ix) Shindi Payan I
- x) Shindi Payan II and
- xi) Zakhi

POPULATION 283654

PK 65

- a) Census Charge No. 1 Cherat Cantonment
- b) Census Charge No. 2 Pabbi Municipal Committee
- c) Pabbi Qanungo Halqa of Pabbi Tehsil excluding the following PCs
 - i) Amankot
 - ii) Chowki Drab
 - iii) Banda Mohib
 - iv) Banda Sheikh Ismail

- v) Banda Nabi
- vi) Dagai
- vii) Jabba Daudzai
- viii) Ghari Momin
- ix) Shindi Payan I
- x) Shindi Payan II
- xi) Zakhi

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POPULATION 301048

(Note: This representation and the proposed delimitation of affects PK 64 AND PK-65, and doesn't affect any other constituency in the District, thus the delimitation of these two constituencies are given in the representation, the rest of constituencies may kindly be considered /given detailed as proposed in the preliminary list of constituencies.)

It is therefore prayed that on acceptance of the instant representation in view of the above the delimitation of the provincial constituencies of District Nowshehra, specifically PK 64 and 65 may kindly be delimited as proposed in this representation.

Zahoor Shah

S/O Zahid Ullah

R/O Mohalla Islamabad, VPO Tarkha

Tehsil Pabbi District Nowshehra

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