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BEFORE THE HON'BLE ELECTION COMMISSION OF PAKISTAN,  
ISLAMABAD.

Representation No: \_\_\_\_\_ 2018.

**REPRESENTATION U/S 10(2) ACT NO. XXXIV OF 1974 SEEKING**  
**DELIMITING OF TERRITORIAL CONSTITUENCIES**  
**PK-88 / BANNU-II, PK-89 / BANNU-III AND PK-90 / BANNU-IV**

Respectfully sheweth,

**Preliminary Submissions.**

1. That the petitioner prefers instant representation in terms of, inter-alia, sub-section 2 to section 10 of the Delimitation of Constituencies Act-1974 read with the provisions of the Constitution, 1973.
2. The petitioner hereby seeks indulgence by the Hon'ble Commission in reconsideration of the delimitation of the constituencies titled PK-88 / Bannu-II, PK-89 / Bannu-III and PK-90 / Bannu-IV on the grounds mentioned hereinafter.
3. That the petitioner is a *bona-fide* citizen of Pakistan domiciled in the District of Bannu, Khyber Pakhtunkhwa, has been an elected representative of the people of constituency declared as PK-89 (Former PF-72) and is entitled to vote at an election to the National / Provincial Assemblies. A copy of the National Identity Card is annexed hereto at Appendix-A.
4. That the representation is well within limitation and the terms as determined & defined under the law *ibid*.

**Facts/Grounds.**

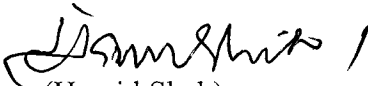
1. That the delimitation as contained in List purporting PK-88 / Bannu-II, PK-89/Bannu-III and PK-90 / Bannu-IV is in conflict with the very spirit and the principles enshrined in the relevant laws *ibid*. Hence, is liable to be amended / altered and modified as proposed. The proposal thereof is annexed hereto at Appendix-B. The slight amendment / modification per suggestion of the petitioner would ensure perfect harmony / homogeneity and public convenience in line with the spirit of the relevant law.
2. That the delimitation per the existing List is impracticable in terms that,
  - i) Distribution of population has been carved in disregard to the social / racial / linguistic and traditional aspects prevalent in the concerned area. The principles of delimitation as enshrined in section 9 of Act XXXIV of 1974 would fully be met if Patwar Circles namely Haved Khas, Landi Dak & Dardariz (total population 17,338) of Girdawar Circle Gharbi, are excluded from PK-89 (Bannu-III) and Patwar Circle Amandi (total population 19,983) of Girdawar Circle Saddar of PK-90 (Bannu-IV) be included in PK-89 (Bannu-III), thus bringing the total population of PK-89 Bannu-III to 2,98,857.
  - ii) The change is likewise required to be introduced in respect of PK-88 (Bannu-II) by adding the territory/population of Patwar Halqas namely Haved Khas, Landi Dak & Dardariz (total population 17,338) of Girdawar Circle Gharbi, as per proposed exclusion from PK-89 (Bannu-III) and that of Patwar Circle Fateh-khel Kausar of Girdawar Circle Khwaja-mad (Bannu Tehsil) with population of 23,593 be excluded therefrom and thereby bringing the population of Pk-88(Bannu-II) to 2,83,392.

- (2)
- iii) Similarly change in delimitation of PK-90 (Bannu-IV) is proposed to the extent of addition of Patwar Circle namely Fateh-khel Kausar of Girdawar Circle Khwaja-mad (Bannu Tehsil) with population of 23,593 while exclusion of Patwar Circle Amandi (total population 19,983) of Girdawar Circle Saddar of PK-90 (Bannu-IV) thus bringing the total population of PK-90(Bannu-IV) to 2,87,946.
- iv) The records would fully support the proposed amendment. It will also not cause any effect population wise.
- v) That in present delimitation the very geographical compacting of the area has been ignored which needs review and rectification.
- vi) Presently, existing boundaries of administrative units are overlapping. However, the proposed change / amendment shall bring the theme of delimitation closer to reality and in keeping with the spirit & true purpose of delimitation.
- vii) Currently, provision and facility of communication besides public convenience and other cognate factors ancillary thereto have blatantly been ignored in the delimitation impugned list. The geographical conditions prevailing in the area covering the constituencies of PK-88 (Bannu-II), PK-89 (Bannu-III) and PK-90 (Bannu-IV) have not been taken into account while demarcating either of the constituencies. With proposed amendments the boundaries of the administrative units, facilities of communication and public convenience would be achieved without loss to any party, individual or Government.
- viii) That the proposed change is desired on basis of geographically compact blocks, easy access, facilities of communication and public convenience.
- ix) That the necessity of the proposed amendments would be explained in details through maps and records during the hearing of the representation.

**Prayer:**

In view of the foregoing facts / grounds it is requested that in exercise of powers conferred under section 10 (3) of Act XXXIV of 1974 r/w the relevant laws on the subject necessary amendment / alteration and modification may please be carried out in the Delimitation List of constituencies purporting PK-88 / Bannu-II, PK-89 / Bannu-III and PF-90 / Bannu-IV in the best public interest.

Yours' Humble Petitioner,

  
(Hamid Shah)  
S/O Kamal Shah,  
R/O Dheiri Syedan,  
Mamash-khel No-Garhi,  
District Bannu.

Dated 02/04.2018.  
Encl.: Appen.A & B, with  
Explanatory Note.