To,
The Secretary Election Commission of Pakistan Islamabad

31/2/20

Objections on Delimitation of PK-87 Bannu-I, KPK which has been delimitated by violating the basic principles and guide lines as enacted in Article 20 of Election Act 2017

Respected Sir,

Petitioner/objector submits as under:-

- 1. That the applicant is the bonafide resident of Azeem Killa, Khander Khan Khel Tehsil and District Bannu-KPK and is aggrieved on the recent delimitation of PK-87 Bannu-I KPK. (Copy of CNIC and vote number is attached as annexure- A, A-1).
- That the delimitation of constituency of PK-87 is against Election Rules and Election Act 2017 which provides basic requirements and guide lines for delimitation but delimitation committee has delimitated the above constituency in utter disregard of Section 20 of Election Act of 2017.
- 3. That according to the Election Rules 2017 delimitation of constituency shall start from the northern end of the district and in clock wise manner while in the present case the above constituency has been delimitated in an anti clock wise manner which is the sheer violation of Election Rules and Regulations because at the time recent delimitation, the delimitation committee has totally ignored the above said basic principles of delimitation the real and legal course of delimitation of PK-87 Bannu-1, is to exclude Bizen Khel-II from PK-87 and to include Salima Skinder Khel.
- 4. That both the above patwar circles are having approximately equal population and will not exceed the population of either PK-90 or PK-87, besides this patwar circle Bizen Kheil-II which is part of PK-

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87 according to recent delimitation but the same patwar circle is having no passage or approach from PK-87 and is easily approachable from PK-90 because if some one wants to approach and enter in patwar circle Bizen Khel-II he has to enter there from PK-90 which shows that Bizen Khel-II is the natural part of PK-90 Bannu-IV. On the other hand patwar circle Salima Skindar Khel which situates in the southern end of PK-90 Bannu-IV is to be kindly deleted from PK-90 which will not either exceed or decrease the population of both PK-87 Bannu-I and PK-90 Bannu-IV.

- 5. That according to the above proposal it will meet the basic requirements of Election Rules and Regulations according to Election Act 2017 and will not either disturb any one or will create any hurdle in public convenience between the inhabitants of PK-87 Bannu-I and PK-90 Bannu-IV because according to map of District Bannu Bizen Khel-II is the natural part and parcel of PK-90 Bannu-IV while patwar circle Salima Skinder Khel is the natural part PK-87 Bannu-I because whole Skinder Khel tribe comprising of three circles Shahbaz Azmat Khel, Shagi Machal Khel, and Shamshi Khel are already included in PK-87 Bannu-I.
- 6. That the above said proposal will not violate the principles of geographically compactness, public convenience, physical features and cognate factors which ensures homogeneity in the creation of new constituencies.
- 7. That the applicant has prepared proposals according to basic guide lines and principles per Election Act 2017 which is annexed with my petition/representation.

It is humbly requested, that the objections may kindly be allowed and the delimitation of PK-87 Bannu-I may kindly be

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reconsider as per rules and regulations enacted in Election Act 2017 in the best interest of justice and fair play.

Applicant/Objector

Sohrab Khan S/o Rustum Khan Khan R/o Azeem Killa, Khander Khan Khel Tehsil and District Bannu-KPK CNIC No.11101-0567895-1

Through

SALEEM KHAN

Advocate High Court Office No.35, Johar Road, Haroon Block District Courts F-8 Islamabad Cell No. 0314-9853868