

M. Khan  
31/3/18

To,  
The Secretary Election Commission of Pakistan  
Islamabad

**Objections on Delimitation of PK-88 Bannu-II, KPK which has been delimited 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 Ased Khojeri, District Bannu-KPK and is aggrieved on the recent delimitation of PK-88 Bannu-II KPK. (Copy of CNIC and vote number is attached as annexure- A, A-1).
2. That the delimitation of constituency of PK-88 is against Election Rules and Election Act 2017 which provides basic requirements and guide lines for delimitation but delimitation committee has delimited 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 previous constituency and in clock wise manner while in the present case the above constituency has been delimited in an anti clock wise manner which is the sheer violation of Election Rules and Regulations because at the time of recent delimitation, the delimitation committee has totally ignored the above said basic principles of delimitation the real and legal course of delimitation of PK-88 Bannu-II, by including patwar circle Kotpasha which is natural part of PK-87 instead of including patwar circle Kotpasha in PK-88 Bannu-II, patwar circle Shadev if included in PK-88 will meet the basic principles of geographical compactness, public convenience and other cognate factors which ensures homogeneity in the creation of new constituencies.

M. J. Khan  
20/3/18

2

4. That according to the map of District Bannu patwar circle Shadev situates in the north of PK-89 while patwar circle Kotpasha which is situated in the southern end of PK-87 Bannu-I has been wrongly and illegally taken away from above constituencies and added the same in PK-88. The real and legal course for delimitation is to exclude Kotpasha from PK-88 and to exclude Shadev from PK-89 Bannu-III and to add the same in PK-88 Bannu-II which will in either way does not disturb the basic principles and guide lines of delimitation according to Election Act 2017.
5. 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.
6. 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 reconsider as per rules and regulations enacted in Election Act 2017 in the best interest of justice and fair play.

Applicant/Objector

*M. J. Khan*  
Sheroz Khan  
S/o Murad Ali Khan  
R/o Ased Khojari, District Bannu-KPK  
CNIC No.11101-0210812-5

Through

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

To,  
The Secretary Election Commission of Pakistan  
Islamabad

Objection Petition/Representation PK-87 Bannu-II, KP

S No.	Description	Annexure	Pages
1.	Objection Petition		1-2 ✓
2.	Copy of CNIC of applicant	A	3
3.	Copy of vote number	A-1	4
4.	Copy of constituencies recent delimited of district Bannu	B	5
5.	Proposed map of constituencies of district Bannu	C	6 ✓
6.	List of constituencies population wise of district Bannu	D	7-8
7.	Population and house hold detail from block to district level of district Bannu	E	9-30
8.	Vakalatnama		-31

Applicant/Objector  
(Sheroz Khan)

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