To, The Secretary Election Commission of Pakistan Islamabad

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 Kotpasha Firoze, 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).
- 2. 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 previously before recent delimitation by the Election Commission PK-87 was PK-71 Bannu-II and patwar circle Kotpasha was included in PK-71 Bannu-II and now due to recent delimitation the above patwar circle Kotpasha has been unnecessarily and in utter disregard of Section 20 of Election Act 2017 deleted an included in PK-88.
- 4. 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

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Election Rules and Regulations because Kotpasha Patwar circle situates in south of the district which has wrongly been excluded from PK-87 Bannu-I.

- 5. That three patwar circles namely (i) Umarzai (ii) Bizen khel-I and Bizen Khel-II are situated in the north of District Banuu which was previously part and parcel of PK-58 Bannu-I, during the general election held in 1997. The proper and legal course under Section 20 of the Election Act was to exclude some of the above patwar circles from PK-87 and include the same in PK-90 which will meet the requirement of Election Rules in clock wise manner while exclusion of patwar circle Kotpasha which falls in south of the district has been wrongly excluded from PK-87 and included in PK-88.
- 6. That the above said patwar circles Umarzai, Bizen Khel-I, and Bezin Khel-II are geographically compact with PK-90, and major portion of above said patwar circles are not even approachable from PK-87 because if one came wants to approach and enter Bizen Khel-II and some portion of Umarzai patwar circle he has to approach the same from PK-90, if instead of Kotpasha having population of 15216 some portion of above said patwar circles Umarzai, Bizen Khel-I and Bezin Khel-II are included in PK-90, and if exceeds the population of PK-90 the same can be adjusted by exclusion some portion of PK-90 and its inclusion in PK-89 or PK-88 or PK-87 as geographically connected with each other.
- 7. That if the above said proposal by inclusion of Kotpasha patwar circle in PK-87 and exclusion of some portion of patwar circles Umarzai, Bizen Kheil-I, and Bizen Khell-II from PK-87 will not disturb any constituency in any

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manner, and will also meet the basic requirements per Election Act 2017 and Election Rules 2017.

- 8. That if the newly delimitated PK-87 is not corrected accordingly to Section 20 of Election Act it will create so many difficulties and hardships for inhabitants of PK-87 Bannu-I because the delimitation committee while conducting the delimitation in district Bannu specially in Pk-87 has ignored the basic principles and guide lines according to Section 20 of Election Act2017.
- 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

Tahir Ullah Khan

S/o Falak Naz Khan R/o Kotpasha Firoze, District Bannu-KP

Through

SALEEM KHAN

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