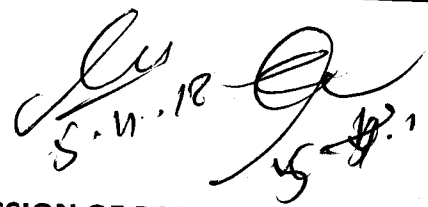


S. N. 18  


**BEFORE THE HONOURABLE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD**

Petition No. \_\_\_\_\_/2018

Faheem Ullah Khan Son of Azad Khan Resident of Khandarwala Feroz Tehsil & District Bannu.  
 ..... (Petitioner)

**VERSUS**

- 1) Election Commission of Pakistan through Secretary Election Commission Islamabad.
- 2) Government of Khyber Pakhtunkhwa through its Chief Secretary Khyber Pakhtunkhwa, Peshawar.
- 3) Provincial Election Commissioner through its Chairman Khyber Pakhtunkhwa Peshawar.
- 4) District Election Commissioner District Bannu.
- 5) Senior Member Board of Revenue Khyber Pakhtunkhwa, Peshawar.
- 6) Commissioner Bannu Division, Bannu.
- 7) Deputy Commissioner, Bannu Division, Bannu.
- 8) District Officer Revenue/Collector, District Bannu. .... (Respondents)

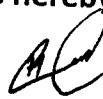
**SUBJECT: PETITION/REPRESENTATION UNDER SECTION 21 ELECTION ACT, 2017, READ WITH RULE 11 OF ELECTION RULES 2017, FOR MAKING APPROPRIATE CHANGES IN THE PROVINCIAL CONSTITUENCIES OF DISTRICT BANNU I.E. PK-87, PK-88, PK-89 AND PK-90.**

**Respectfully Sheweth;**

- 1) That, the petitioner is bona fide resident of village Khandarwala Feroz District Bannu and is voter in PK-88, and is village councilor in Ward No. 18 Shamshi Khel village council Mughal Khel Bannu Khyber Pakhtunkhwa. The petitioner is social worker and is patriot.

• (Attested Copy of petitioner as a voter is hereby annexed as Annexure-A)





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- 2) That, the District Bannu was comprising of four provincial halqajat i.e. PK-70, 71, 72 and 73. And now in the new delimitation this Honourable Commission change the above constituency into PK-87 to PK-90.

(Copy of proposed notification issued by this Honourable Commission hereby annexed as Annexure-B)

- 3) That, the total population of District Bannu is 1167892 and the population of PK-87 is 297697, population of PK-88 is 289647, PK-89 is 296212 and PK-90 is 284336.

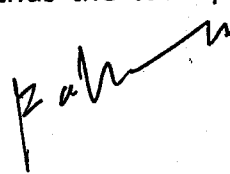

- 4) That, Ward No. 5/Union Council Shamshi Khel comprising of two patwar circle namely Kotpashah PC and Shamshi Khel PC. The population of Kotpasha PC is 15216 and Shamshi Khel PC is 13437 and the total population of Ward No. 05 is 28653. This Ward No. 05/Union Council Shamshi Khel previously was in PK-71 now PK-87 and in the new delimitation Ward No. 5/Union Council divided into two parts and one part Kotpasha PC brought into PK-88 from PK-87.

(Copies of population detail and Union Council wise map of District Bannu is hereby annexed as Annexure-C & D)

- 5) That, the Ward No. 09/Union Council Kot Qalandar comprising of two patwar circle namely Shegi Machan Khel and Kot Qalandar. This Ward divided and Shegi Machan Khel PC is in PK-87, while Kot Qalandar PC is in PK-88. The population of Shegi Machan Khel PC is 9636 and population of Kot Qalandar is 17632 and thus the total population became 27269.

- 6) That, the total population of Ward No. 41/Union Council Shabaz Azmat Khel is 19737 and Shegi Machan Khel PC is 9636 and thus total population of ward/union council Shabaz Azmat Khel and Shegi Machan Khel PC is 29373, which are situated in PK-87.

- 7) That, the ward/union council Haved Khas is comprising of two patwar circle i.e. Haved Khas PC (Population 16370) and Landidak Haved PC (Population 5126) and thus the total population of this ward/union council is 21496.

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This ward/union council is divided into two parts one is given to PK-88 while the other to PK-89.

- 8) That, the ward/union council Daud Shah situated in PK-89 and its total population is 20351.
- 9) That, the petitioner seeks the changes according to the following table i.e;

PK-87	PK-88	PK-89	PK-90
Population 297697	Population 289647	Population 296212	Population 284336
Kotpasha PC 15216 (+)	Shegi Machan Khel PC (+) 9636	Haved Khas PC (+) 16370	Daud Shah Ward/U.C (+) 20351
Total 312913	Total: 299283	Total 312582	Total: 304687
Shegi Machan Khel PC (-) 9636	Shabaz Azmat Khel Ward/ Union Council (+) 19737	Daud Shah Ward/U.C (-) 20351	
Total 303277	Total: 309384	Total 292231	
Shabaz Azmat Khel Ward/ U.C (-) 19737	Kot Pasha PC (-) 15216		
Total: 283540	Total: 303804		
	Haved Khas PC (-) 16370		
	Total: 287431		

- 10) That, the petitioner being aggrieved having no other adequate remedy in hand comes to this Honourable Commission, inter alia on the following grounds.

**GROUND:**

- a) That, the new delimitation is against the fundamental rights of the petitioner as well as of the whole locality being unconstitutional, illegal, void and annihilation upon the rights of the petitioner as well as population of all the constituencies.
- b) That, due to new delimitation the Ward No. 5/Union Council Shamshi Khel, Ward No. 9/Union Council Kot Qalandar and Ward/Union Council Haved Khas is fully effected and one part of the ward/union council is in one

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constituency while the other in another constituency. And these wards/union councils having their own culture and traditions having no concern with the other constituencies.

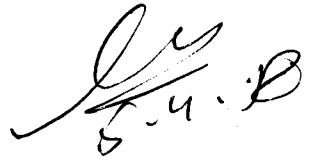
- c) That, due to new delimitation the ward/union council are divided and one brother will cast vote in one constituency and the other brother in other constituency. Meaning thereby that the families are divided due to delimitation.
- d) That, if the changes are made according to the above table then neither the population will be effected nor union council will be effected, and geographically the constituencies will also be fit.

For the above stated reasons and other to be stated at the time of arguments, it is, therefore, most humbly prayed that on acceptance of this petition, this Honourable Commission may very kindly be make an appropriate order with the directions to the respondents to make appropriate changes in the provincial constituencies of District Bannu Khyber Pakhtunkhwa i.e. PK-87, PK-88, PK-89 and PK-90 according to the following table;

PK-87	PK-88	PK-89	PK-90
Population 297697	Population 289647	Population 296212	Population 284336
Kotpasha PC 15216 (+)	Shegi Machan Khel PC (+) 9636	Haved Khas PC (+) 16370	Daud Shah Ward/U.C (+) 20351
Total 312913	Total: 299283	Total 312582	Total: 304687
Shegi Machan Khel PC (-) 9636	Shabaz Azmat Khel Ward/ Union Council (+) 19737	Daud Shah Ward/U.C (-) 20351	
Total 303277	Total: 309384	Total: 292231	
Shabaz Azmat Khel Ward/ U.C (-) 19737	Kot Pasha PC (-) 15216		
Total: 283540	Total: 303804		
	Haved Khas PC (-) 16370		
	Total: 287431		

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*[Signature]*



Any other relief, if this Honourable Commission may deem fit in the circumstances may also be granted.



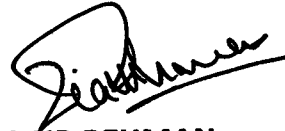
PETITIONER

FAHEEM ULLAH KHAN

THROUGH COUNSEL



PIR HAMID ULLAH SHAH



ZIA UR REHMAN

ADVOCATES HIGH COURT

DATED: 07/04/2018

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**BEFORE THE HONOURABLE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD**

Petition No. \_\_\_\_\_/2018

**Faheem Ullah Khan**

**VS**

**Secretary Election Commission of Pakistan etc**

**VERIFICATION**

Verified on oath this 2<sup>nd</sup> Day of April 2018 at Bannu at 11:00 am on Monday the information received and believed to be true. And the contents of this petition are true, correct and to the best of my knowledge, belief, available record and nothing have been concealed from this Honourable Tribunal.

**DEPONENT**



**Faheem Ullah Khan**

**CNIC No.**

11101-1470307-9