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**BEFORE THE ELECTION COMMISSION OF PAKISTAN THROUGH ITS
SECRETARY/CHAIRMAN ECP**

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Representation against the preliminary proposal of the delimitation of constituency PK-91 with reference to notification dated; 5th march 2018.

Respectful Sheweth;

The petitioner submits as under;

BRIEF FACTS

- 1- That the petitioner hails from village Dalokhel and is a registered voter of old constituency PK-76.(Voter list is annexed as Annexure "A")
- 2- That the petitioner had contested the General Election in 2013 as an independent candidate from PK-76 (proposed PK-91) and had secured highest votes than all the contesting candidates at polling stations situated in patwar circles Abakhel-I and Abakhel-II (Result statement is annexed as Annexure "B").
- 3- That the commission has made preliminary proposals for the delimitation of the said constituency for the upcoming general elections and has excluded the village Abakhel from PK-91(old PK-76) by including the same in PK-92 (old PK-75).(The revenue administrative unit's map is annexed as Annexure "C")
- 4- That the petitioner being desirous to contest the upcoming elections from PK-91 (old PK-76), is dissatisfied from the delimitation of his constituency through preliminary report published vide notification dated: 5th march 2018, therefore, he submits this representation on the following grounds;

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GROUND:

- 1- That the proposals of delimitation committee are against the principles laid down in provisions of the Election Act 2017 and rules framed there under.
- 2- That the delimitation committee has totally ignored the principles of delimitation of the constituencies having regard to the distribution of population and geographically compact areas, existing boundaries of administrative units, facilities of communications and public convenience

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and other cognate factors to ensure homogeneity in the creation of the constituency.

- 3- That it is undeniable fact that after the recent census, no additional seat was created for the provincial assembly for district Lakki Marwat, therefore there was no occasion for the said committee to delimit the territorial constituencies of district Lakki Marwat for election to the provincial assemblies.
- 4- That as the delimitation committee did not find any population difference amongst the three provincial constituencies of district Lakki Marwat, therefore, its proposals to delimit the territorial constituencies are not in accordance with rules and guidelines on the subject matter.
- 5- That the commission can delimit territorial constituencies on the basis of population having regard to the boundaries of the administrative units but in the present case the delimitation committee has illegally proposed the exclusion of patwar circles of Abakhel-I and Aba khel-II from the constituency PK-91 and its inclusion in the constituency of PK-92, is not only irrational but also causing inconvenience to all the voters of the three constituencies of district Lakki Marwat.
- 6- That the proposed delimitation would divide the people of one cast, family and same tribe of ABASHAHEEDKHEL i.e village Abakhel and Dallokhel, resulting into creation of gulf and disharmony amongst them.
- 7- That the proposed delimitation would show that a middle part of the constituency of PK-91 has been separated and included in PK-92 which would cause inconvenience during elections to voters while travelling from one part to other part of their constituency which may result into clashes between the voters of rival parties of the two constituencies.
- 8- That the proposals of the delimitation committee regarding inclusion of some part of the patwar circles of Issac khel kanungo Halqa from PK-91 and its inclusion in PK-92 and its proposals of separation of other patwar circles of the Issac khel Kanungo Halqa being part of old PK-75 for the purpose of its inclusion in PK-91 are illegal and irrational, as there was no need of exclusion of some patwar circles of Issac khel Kanungo Halqa from one constituency and its inclusion in another constituency, therefore the said

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proposals are against the provision of law, rules and guidelines on the subject.

9- That patwar circle of Dallo khel and circles of Abakhel come within territorial limits of Police Station Lakki Saddar and is linked but the proposed delimitation would cause inconvenience to the inhabitants of patwar circles of Abakhel.

10- That the petitioner and other voters of the old constituency PK-76 were not associated in the delimitation proceedings and they have been condemned unheard.

It is therefore humbly prayed that on acceptance of this representation, the proposal of delimitation committee may kindly be rejected and the old territorial limits of the provincial constituencies of district Lakki Marwat may be kept intact.

In the alternative;

The Issac khel Kanungo Halqa may kindly be divided according to the geographically compact area and from amongst the patwar circles of Issac khel Halqa, the patwar circle of Issac khel, Abakhel-I, Abakhel-II, Nawarkhel, Begukhel taraf Mehrdad khel, Langar khel Hati khan, BeguKhel taraf Achukhel, Daulat Khel, Ahmad Khel, Maidanwa and be included in PK-91 while the rest of the patwar circles of Issac khel kanungo Halqa may graciously be included In PK-92.

Note: - copy of petitioner's CNIC and unmarked filled map is annexed herewith.

Dated; 29/03/18.

PETITIONER

Johar Muhammad s/o Dilawar khan
R/OMohallahAzizanDallokhel
Tehsil and District LakkiMarwat.

CNIC NO; 11201-0369877-9

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Through;

NAJIB ULLAH KHAN ADVOCATE HIGH
COURT