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**BEFORE THE AUGUST ELECTION COMMISSION OF PAKISTAN,
THROUGH ITS CHAIRMAN / SECRETARY ISLAM ABAD.**

**Representaion against the delimitation of constituency PK-93
with refrence to notification Dated 5th March, 2018.**

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Respectfully Sheweta,

The petitioner submit as under.

1. That, the petitioner hail from village Khan Khel Mandozai and they were registered voters of old constituency PK-74. The commission has delimited the territorial limits of said constituency for election to the provincial assembly and has excluded the village Khan Khel Mandozai from PK-93 (old Pk-74) by including the same in PK-92 (old PK-75).
2. That, the petitioner being dissatisfied from the delimitation of their constituency through preliminary report published vide notification dated 5th March, 2018 submit /this representation of the following grounds.

GROUND:-

- a. That the proposals of the delimitation committee are against the principles laid down in provision of the Election Act, 2017 and rules framed there under.
- b. That, 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 communication and public convenience and other cognate factors to ensure homogeneity in the creation of the constituency.
- c. That, it is an undeniable fact that after the recent census no additional seat was created for the Provincial Assembly for the district Lakki Marwat, therefore there was occasion for the said committee to delimit the territorial

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constituencies of District Lakki Marwat for election to the Provincial Assembly.

- d. 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.
- e. That, the commission can delimit territorial constituencies on the basis of population having regard boundaries of the administrative units but in the present case the delimitation committee has illegally proposed the exclusion of village Khan Khel Mandozai from the constituency PK-93 and its inclusion in the constituency basis of patwar circles is not only irrational but also causing inconvenience to all the voters of three constituencies of District Lakki Marwat.
- f. That, the proposed delimitation would show that a middle part of the constituency PK-93 has been separated and included in PK-92 which would cause inconvenience during election to voters while traveling from one part to the other part of their constituency which may result into clashes between the voters of rival parties of the two constituency.
- g. That, proposals of the delimitation committee regarding exclusion of some of the patwar circles of issak khel kanungo Halqa from PK-91 and its inclusion in PK-92 and its proposals of separation of other patwar circles of issak 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 issak khel kanungo Halqa from one constituency and its inclusion in another constituency, therefore the above said proposals are against the provision of law, rules and guidelines on the subject.
- h. That, the petitioner and others voters of the old constituency PK-76 were not associated in the delimitation proceedings and they have been condemned unheard.

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It is, therefore, most respectfully prayed that on acceptance of instant representation, the proposals of delimitation committee may kindly be rejected and old territorial limits of the provincial constituencies of District Lakki Marwat may be kept intact.

Dated: 27/03/2018


Yours Humble Petitioner,

Ihsan Ullah Khan S/O ~~Baid~~ Ullah Jan R/O
Khan Khel Mandozai District Lakki
Marwat.

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