

BEFORE THE ELECTION COMMISSION OF PAKISTAN

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AA 28/13/2018
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REPRESENTATION UNDER SECTION 21(3) OF
ELECTIONS ACT 2017 AGAINST THE PROPOSED
DELIMITATION NOTIFIED BY ELECTION
COMMISSION OF PAKISTAN UNDER SECTION
21(1) OF ELECTION ACT, 2017 IN RESPECT OF
PROVINCIAL CONSTITUENCY PK-96 DERA ISMAIL
KHAN-II

Prayer:- THAT THE PROPOSED DELIMITATION OF PK-
96 IS AGAINST THE NOTIFIED PRINCIPLES
OF PROPOSED DELIMITATION UNDER
SECTION 20(1) OF THE ACT AND
THEREFORE, THE ALTERATIONS/
VARIATIONS MADE IN THE PROPOSED LIST
IN THE PREVIOUS LIMITS OF THE SAME
CONSTITUENCY WITH THE NAME OF PK-96
BE WITHDRAWN AND THE AREAS WHICH
WERE COMPRISING OF OLD PK-65 IN THE
GENERAL ELECTIONS 2002, 2008 AND 2013
BE RESTORED WITHOUT ANY VARIATIONS,
ADDITIONS OR EXCLUSION.

28/03/18

Respectfully Sheweth :-

1. That PK-96 notified in the proposed list of the constituencies on the basis of census 2017 has been interfered without reasons or justification.
2. That Section 20(4) of the Act for making variations in the existing limits of the constituency, the Commission is required to publish reasons thereof alongwith proposed variations and therefore, in the absence of reasons, if any, the exercise of the variations by the commission in the compact boundaries of PK-65 Old new PK-96 is in violation of Section 2 (4) of the Act, therefore, illegal.
3. That in the previous limits of PK-65 now PK-96 Qanoongo Halqa Shorkot was part of the constituency excluding patwar circle Shorkot. Similarly Qarroongo Halqa Yarak was the part of the constituency excluding patwar circle Giloti. Similarly complete qanoongo halqa bandkoria was part of the constituency PK-65 now PK-96 but in the proposed list patwar circles bandkoria, rodikhal, rakhookhshkali, rangpur shumali and kalagorh have been excluded alongwith qanoongo halqa paharpur. Similarly patwar circles shahdo and wandha khaaliq shah were part of the previous

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constituency but now have been excluded. Similarly qanoongo halqa chakhan alongwith its patwar circles of tehsil D.I.Khan have been excluded from old PK-65 and have been included in PK-99 D.I.Khan-V (tehsil Kulachi). Thus public convenience has been abused, the principles of compact boundaries violated and the entire variations/ alterations exclusion, inclusion is not based on reasons /justification and does not appeal to sound mind.

4. Similarly now in the Qanoongo Halqa Muriyali of tehsil D.I.Khan patwar circles Kotla Habib, Khotti, Shernau and Mapal have been excluded which previously were part of the constituency. Patwar circles of tehsil D.I.khan qanoongo halqa Dhapchabak and katchi painda khan which were part of the constituency previously have been excluded for no reason and justification. Therefore, the entire exclusion, inclusion and variations made in PK-96 are against the principles of distribution of population in geographic compact and also physical features existing boundaries of the administrative units and the public convenience of communication has been ignored resulting in large scale protests by

JA 23/07/2018

the public of the area who are demonstrating with the processions against the proposed delimitation. The principles of homogeneity has also been violated.

It is therefore, prayed that the representation be accepted as prayed in the heading.

Petitioner

(Sonhran Khan s/o
Muhammad Ramzan, P.O
Thata Balochan, Tehsil &
District D.I.Khan) 0346-7850467

Through

Dated. 19.03.2018


(QAZI MUHAMMAD ANWAR)

Senior Advocate


10-A, Nasir Mansion, Peshawar

AFFIDAVIT.

I, Sonhran Khan s/o Muhammad Ramzan, P.O Thata Balochan, Tehsil & District D.I.Khan, petitioner, do hereby solemnly declare and affirm on oath that the contents of the above representation are true and correct to the best of my knowledge and belief and nothing has been kept secret

Deponent

Identified by:


(Qazi Muhammad Anwar)
Senior Advocate.