

Handwritten signature and date: 28/07/2018  
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BEFORE THE ELECTION COMMISSION OF PAKISTAN

REPRESENTATION UNDER SECTION 21(3) OF  
ELECTIONS ACT 2017 AGAINST THE PROPOSED  
DELIMITATIONS OF PROVINCIAL CONSTITUENCY  
PK-98 DERA ISMAIL KHAN-IV.

Prayer:- That on acceptance of the representation  
Patwar Circles “(i)Kiri Shamoza, (ii) Fatah Ali,  
(iii) Jhok Mohava & (iv) Gur Wali” of Qanoongo  
Halqa Miran Tehsil Parova, which have been  
wrongly excluded from PK-98 Dera Ismail  
Khan-IV be restored and included in PK-98  
Dera Ismail Khan-IV and patwar circles  
“(i)Fateh, (ii)Haji Mora, (iii)Kotla Habib,  
(iv)Khatti, (v)Shero Nau, & (vi) Mapal” whch  
have been wrongly included from Qanoongo  
Halqa Muriyali Tehsil D.I.Khan be excluded  
from PK-98 Tehsil Parova with such other  
relief as may be deemed proper in the  
circumstances of the case in accordance with  
principles of delimitation prescribed in Section  
20 of elections Act, 2017.

28/07/2018

Respectfully Sheweth :-

1. On the basis of census of 1998 delimitation of the constituency was carried out and provincial constituency 66 was notified which under the present delimitation has become PK 98 D.I.Khan-IV.
2. The present PK-98 D.I.Khan-IV was previously as stated for the elections 2002, 2008 and 2013 was comprised of present administrative tehsil parova of D.I.Khan District and patwar circles “(i)Kotla Habib, (ii)Khatti, (iii)Shero Nau, & (iv) Mapal” of Qanoongo Halqa Muriyali Tehsil D.I.Khan were not part of PK-66.
3. As against the principles of delimitation as prescribed in Section 20 of the Act, the four patwar circles of Qanoongo halqa Miran Tehsil Parova have been excluded from PK-98 and instead patwar circles of Muriyali of Qanoongo Halqa Tehsil D.I.Khan have been included in PK-98. The aforesaid exclusion and inclusion is against the principles of geographical compact of the area and also is against the principles of physical features of the existing administrative boundaries. Similarly the facilities of communications of the public convenience does not ensure homogeneity therefore the exercise of exclusion and inclusion as mentioned above has been carried out in violation of the basis principles mentioned in Section 20 of the Act.
4. That if areas which have been wrongly excluded from PK-98 are restored and given back to PK-98 and the areas of Muriyali of Qanoongo Halqa of

D.I.Khan Tehsil which have been excluded the population shall remain within the permissible limits and the requested variations shall not exceed 10% of the total population of the constituency.


5. That map of the constituency which has been notified by the election commission is enclosed with this representation.

Petitioner

(Fakhar Ullah Khan Mian Khel  
son of Hafiz Saadullah Khan  
Mian khel r/o Gara Issa Khan  
Tehsil Daraban District  
D.I.Khan)

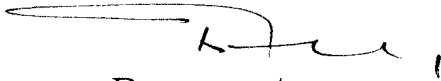
Through

Dated.19.03.2018


  
(QAZI MUHAMMAD ANWAR)  
Senior Advocate  
10-A,Nasir Mansion, Peshawar

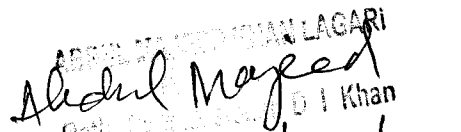
AFFIDAVIT.

I, Fakhar Ullah Khan Mian Khel son of Hafiz Saadullah Khan Mian khel r/o Gara Issa Khan Tehsil Daraban District D.I.Khan 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.

  
Ahsan Ullah Lagari  
Oath Commissioner D.I. Khan  
Date: 27/3/18