To,

The Secretary,

Election Commission of Pakistan,

Islamabad.

Subject:

REPRESENTATION U/S 21(3) OF THE ELECTION ACT, 2017 AGAINST THE PRELIMINARY DELIMITATION OF THE CONTITUENCY IN RESPECT OF PP-125, PP-128 & PP-129 JHANG NOTIFIED ON 05.03.2018

Respected Sir,

With reference to Notification No. F.8(3)/2018-Elec-I dated 05.03.2018, regarding publication of preliminary report of delimitation of constituencies of National Assemblies and Provincial Assemblies, we hereby filed objections against the above said preliminary delimitation of national and provincial constituencies PP-125, PP-128 & PP-129 Jhang as under:

- 1. That the principles laid down in section 20 of the Election Act, 2017 and rule 12 of the Election Rules, 2017 have not been complied with in stricto-senso.
- 2. That geographically compact area means natural and political division of the earth which seems to be one unit. Unfortunately the preliminary delimitation in respect of PP-125, PP-128 & PP-129 Jhang is not inconsonance with the geographical nature of the area. That PP-129 has been delimited after giving under mentioned Patwar circles of Mirnawal QH from the other side of river;

- i. Mirnawala
- ii. Mad Rajbana
- iii. Nikokara
- iv. Islampur Nasheb
- v. Fateh Pur
- vi. Sabqi

Due to above delimitation of PP-129 which has been made in violation of the Act and Rules, the delimitation of adjacent PP-128 and PP-125 which is next to PP-128 have been disturbed.

- 3. That the next principle of delimitation is physical feature which is also correlated with the first one. Rule 10(2) of the Election Rules, 2017, specifically provides physical features. Since the river boundary has been violated, the physical feature of the constituency PP-129 has been disturbed and consequently both the PPs 128 & 125.
- 4. That most important fact which determines all other factors is facility of communication and public convenience. In the instant case one side of the river can easily be connected with the other Qh and Patwar Circle of constituency.
- 5. So far as cognate factor is concerned, naturally the people have relations with the people where they feel convenient and have communication facilities. Accordingly residents on the one side of the river have

relations with the people of same area and it is inconvenient for them to approach the other side. Their business and other social activities are similar with their locality.

- 6. That the rule of northern end has not been followed in the delimitation of above said constituencies, which is against the natural justice. Since this rule has been applied in the number of cases of other districts, therefore, equality demands that the same may also be applied while delimiting PP-125, PP-128 & PP-129 Jhang.
- 7. Preliminary and proposed delimitation is given here under in an annotated form:

Preliminary Delimitation			Proposed Delimitation		
Constituency No.	Description	Population	Constituency No.	Description	Population
PP-125 Jhang -II	(a) 18 Hazari Tehil; (b) Massan QH of Jhang Tehisl; (c) The Following PPs of Maginan QH of Jhangi Tehisl; (i) Kot Dewana; (ii) Kot Khera; (iii) Malhuana; (iv) Mansur Sial; and (v) Mohal of Jhang District	395,119	PP-125 Jhang -II	(a) 18 Hazari Tehil; (b) Massan QH of Jhang Tehisl; (c) The following PCs of Marnewala QH of Ahmed Pur Sial Tehsil; (i) Marnewala; (ii) Marnewala; (iii) Sabqi; (iv) Neko Kara; (v) Islampur Nasheb; and (vi) Fateh Pur Pirti; of Jhang District	394,982
	Total	395,119		Total	394,982

	T			T	
PP-128	(a) Bagh TC	377,067	PP-128 Jhang-	(a) Bagh TC	377,995
Jhang-IV	(Old);		IV	(Old);	
	(b) Magiana QH			(b) Magiana QH	
	of Jhang Tehsil			of Jhang Tehsil	
a 5	excluding			(v) Mohal;	
	following PCs;-			(c) Kot Lakhnana	
	(i) Kot Dewan;			QH of Jhang	
				-	
	(ii) Kot Khera;			Tehsil excluding	
	(iii)Malhuana			following PCs;-	
	(iv) Mansur Sial;			(i)Chak	
	and			No.216/JB;	
	(v) Mohal;			(ii) Chak	
	(c) Kot Lakhnana		3	No.446/JB;	
	QH of Jhang		10	(iii)Chak	
	Tehsil excluding			No.447/JB;	
	following PCs;-			(iv)Chak	
	(i)Chak			No.449/JB;	
	No.216/JB;			(v)Chak	
7	AND SECURE SECURE			1 1 1 man and a man a man and a man a man a man a man a man a	
	(ii) Chak			No.454/JB;	11
	No.446/JB;			(d) The following	
	(iii)Chak			QHs of Shorkot	
	No.447/JB;			Tehsil;	
	(iv)Chak			(i) Habeli	
	No.449/JB;			Bahadur Shah	
	(v)Chak			and;	
	No.454/JB;			(ii) Kot Lal	
	(d) The		=	excluding Chka	
	following QHs of			No.797	- F
	Shorkot Tehsil;			(e) Mirak Sial QH	it.
	(i) Habeli			excluding	
	Bahadur Shah			following PCs;-	
	(ii) Kot Lal; and			(i) Yarewal	
	(iii) Mirak Sial			(ii) Hassowali;	
	excluding		80	(iii) Mirak Sial	
	following PCs;-			(iv) Alla Yar Joya	
	(a) Yarewal; and			(v) Farid	
	(b) Hassowali;			Mehmood Katia	
	of Jhang District.			(vi) Foja Dhara	
				of Jhang District.	
	Total	377,067		Total	377,995
PP-129	(a) Shorkot MC;	386,682	PP-129	(a) Shorkot MC;	385,891
Jhang-VI	(b)SHorkot	000,002	Jhang-VI	(b)SHorkot	,
3	Cantt;		Jilalig VI	Cantt;	
	(c) The			(c) The Following	
	1			QH of Shorkot	
	Following QH of				
	Shorkot Tehsil;-			Tehsil;-	
	(i) Shorkot City-			(i) Shorkot City-I;	
	1;			(ii) Shorkot City-	
	(ii) Shorkot City-			II;	
	II;	-		(iii)Shorkot	
	(iii)Shorkot			Cantt; and	
	Cantt; and	2	The state of the s	(iv) Kaki Nau;	
	(iv) Kaki Nau;			(d) The following	
	(d) The			PCs of Mirak Sial	
	following PCs of			QH of Shorkot	
	Mirak Sial QH of			Tehsil;	
	Shorkot Tehsil;			i. Yarewal; and	
L	SHOIKOL TENSII;			i. Tarewai, allu	



i. Yarewal; and ii. Hassowali; (e) The following PCs of Marnewala QH of Ahmed Pur Sial Tehsil; (i) Marnewala; (ii) Marnewala; (iii) Sabqi; (iv) Neko Kara; (v) Islampur Nasheb; and (vi) Fateh Pur		ii. Hassowali; (e) The following PCs of Marnewala QH of Ahmed Pur Sial Tehsil; (i) Marnewala; (ii) Marnewala; (iii) Sabqi; (iv) Neko Kara; (v) Islampur Nasheb; and (vi) Fateh Pur	
(vi) Fateh Pur Pirti; of Jhang District		Pirti; of Jhang District	
Total	386,682	Total	385,891

PRAYER:

That in the light of above legal/factual position, the following amendments in the preliminary delimitation of PP-125, PP-128 & PP-129 Jhang respectively are suggested:

Sr.#	Constituency	Description	Population
	No.		
i.	PP-125	(a) 18 Hazari Tehil;	394,982
	Jhang -II	(b) Massan QH of Jhang Tehisl;	
		(c) The following PCs of Marnewala	
		QH of Ahmed Pur Sial Tehsil;	150 No.
		(i) Marnewala;	
		(ii) Marnewala;	
		(iii) Sabqi;	
		(iv) Neko Kara;	
		(v) Islampur Nasheb; and	
		(vi) Fateh Pur Pirti;	
		of Jhang District	
		Total	394,982
ii.	PP-128 Jhang-IV	(a) Bagh TC (Old);	377,995
		(b) Magiana QH of Jhang Tehsil	
		(v) Mohal;	
		(c) Kot Lakhnana QH of Jhang Tehsil	
		excluding following PCs;-	
		(i)Chak No.216/JB;	
		(ii) Chak No.446/JB;	

6)

		of Jhang District Total	385,891
		(vi) Fateh Pur Pirti;	
		(v) Islampur Nasheb; and	
		(iv) Neko Kara;	
		(iii) Sabqi;	
		(ii) Marnewala;	
		(i) Marnewala;	
		QH of Ahmed Pur Sial Tehsil;	
		(e) The following PCs of Marnewala	
		ii. Hassowali;	
		i. Yarewal; and	
		QH of Shorkot Tehsil;	
		(d) The following PCs of Mirak Sial	
		(iv) Kaki Nau;	
		(iii)Shorkot Cantt; and	
		(ii) Shorkot City-II;	
		(i) Shorkot City-I;	
		Tehsil;-	
		(c) The Following QH of Shorkot	
	Jhang-VI	(b)SHorkot Cantt;	505,051
	PP-129	(a) Shorkot MC;	385,891
		Total	377,995
		of Jhang District.	
		(vi) Foja Dhara	
	la la	(v) Farid Mehmood Katia	
10		(iv) Alla Yar Joya	
	2	(iii) Mirak Sial	
		(ii) Hassowali;	
		(i) Yarewal	
		PCs;-	
		(ii) Kot Lal excluding Chka No.797 (e) Mirak Sial QH excluding following	
	86		
	z.	Tehsil; (i) Habeli Bahadur Shah and;	
		(d) The following QHs of Shorkot	
		(v)Chak No.454/JB;	
		(iv)Chak No.449/JB;	
		(iii)Chak No.447/JB;	

Keeping in view the position stated above, it is requested that proposed amendments in PP-125, PP-128 & PP-129 Jhang which have been made purely in the public interest according

to the Act and Rules may kindly be accepted and delimitation of above Provincial Assembly constituencies may very kindly be amended accordingly, please. (Copies of census data, extracts of voter lists and maps are enclosed for perusal).

Iftikhar Hussain Shah

S/o Mian Fazal Shah Resident of Bhojowana Post Office Malhona, District Jhang. Vote # 367, Statistics Block Code: 156030210 Voter Area Circle Bhojowana, District Jhang

Petitioners

Huspain Ali Khan S/o Khan Umar Daraz Khan Resident of: Post Office Kot Khera, Distric Jhang Vote # 179, Statistics Block Code:156030208 Voter Area Circle Kot Khera, District Jhang

Allah Ditta

S/o Ziadat Ali

Resident of Tehsil Chowk, Street No.1, Mohalla Ghaziabad, Shorkot, District Jhang

Vote # 262, Statistics Block

Code:157080106, Voter Area Circle

Ghazi Pir, District Jhang

Through

Ghulam Muhammad Khan

Advocate High Court Cell # 0300-9821197