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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 CONSTITUENCY 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 in consonance 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
	<b>Total</b>	<b>395,119</b>		<b>Total</b>	<b>394,982</b>

PP-128 Jhang-IV	(a) Bagh TC (Old); (b) Magiana QH of Jhang Tehsil excluding following PCs;- (i) Kot Dewan; (ii) Kot Khera; (iii) Malhuana (iv) Mansur Sial; and (v) Mohal; (c) Kot Lakhnana QH of Jhang Tehsil excluding following PCs;- (i) Chak No.216/JB; (ii) Chak No.446/JB; (iii) Chak No.447/JB; (iv) Chak No.449/JB; (v) Chak No.454/JB; (d) The following QHs of Shorkot Tehsil; (i) Habeli Bahadur Shah (ii) Kot Lal; and (iii) Mirak Sial excluding following PCs;- (a) Yarewal; and (b) Hassowali; of Jhang District.	377,067	PP-128 Jhang-IV	(a) Bagh TC (Old); (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; (iii) Chak No.447/JB; (iv) Chak No.449/JB; (v) Chak No.454/JB; (d) The following QHs of Shorkot Tehsil; (i) Habeli Bahadur Shah and; (ii) Kot Lal excluding Chka No.797 (e) Mirak Sial QH excluding following PCs;- (i) Yarewal (ii) Hassowali; (iii) Mirak Sial (iv) Alla Yar Joya (v) Farid Mehmood Katia (vi) Foja Dhara of Jhang District.	377,995
	<b>Total</b>	<b>377,067</b>		<b>Total</b>	<b>377,995</b>
PP-129 Jhang-VI	(a) Shorkot MC; (b) SHorkot Cantt; (c) The Following QH of Shorkot Tehsil;- (i) Shorkot City-I; (ii) Shorkot City-II; (iii) Shorkot Cantt; and (iv) Kaki Nau; (d) The following PCs of Mirak Sial QH of Shorkot Tehsil;	386,682	PP-129 Jhang-VI	(a) Shorkot MC; (b) SHorkot Cantt; (c) The Following QH of Shorkot Tehsil;- (i) Shorkot City-I; (ii) Shorkot City-II; (iii) Shorkot Cantt; and (iv) Kaki Nau; (d) The following PCs of Mirak Sial QH of Shorkot Tehsil; i. Yarewal; and	385,891

	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 Pirti; of Jhang District			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 Pirti; of Jhang District	
	<b>Total</b>	<b>386,682</b>		<b>Total</b>	<b>385,891</b>

**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 No.	Description	Population
i.	PP-125 Jhang -II	(a) 18 Hazari Tehil; (b) Massan QH of Jhang Tehsil; (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
		<b>Total</b>	<b>394,982</b>
ii.	PP-128 Jhang-IV	(a) Bagh TC (Old); (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;	377,995

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

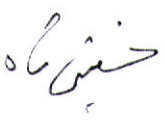
Keeping in view the position stated above, it is requested that proposed amendments in PP-125, PP-128 & PP-129 Jhang which have been made purely in the public interest according

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).

Petitioners


   
**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


  
Hussain Ali Khan

S/o Khan Umar Daraz Khan  
Resident of: Post Office Kot  
Khera, District 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  
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District Jhang  
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Code:157080106, Voter Area Circle  
Ghazi Pir, District Jhang

Through

  
**Ghulam Muhammad Khan**  
Advocate High Court  
Cell # 0300-9821197