

BEFORE THE ELECTION COMMISSION OF PAKISTAN ISLAMABAD.

HA 01/05/2018

REPRESENTATION AGAINST THE PRELIMINARY
REPORT REGARDING CONSTITUENCIES OF PUNJAB
ASSEMBLY DISTRICT RAHIM YAR KHAN UNDER
SECTION 21 (3) OF THE ELECTION ACT 2017 READ
WITH RULE 12 OF THE ELECTION RULES 2017.

Respectfully Sheweth:

1. That the petitioner is permanent resident of Mouza Muhammad Daha Tehsil Liaquatpur which is part of PP-255 Rahim Yar Khan-I and petitioner's name is mentioned in serial No.196 of census block code No.250010204. Vote certificate is attached as Annexure "A".
2. That as per latest censuses the population of District Rahim Yar Khan is 4814006. According to the ratio of population as prescribed by the relevant law and rules six seats of National Assembly Allocated to District Rahim Yar Khan i.e., NA-175 to NA-180 the areas are divided each constituency of National Assembly are as under:-

N.A-175 Rahim Yar Khan-1 (a) Liaquatpur M.C

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(b) *The following QH of Tehsil Liaquatpur:-*

- i. Sidhuwali;*
- ii. Shidani Sharif.*
- iii. Khan Bela.*
- iv. Pakka Laran.*
- v. Allahabad; and*
- vi. Tarukari.*

of District Rahim Yar Khan.

Total

N.A-176 Rahim Yar Khan-II a)

Khanpur M.C

b) The Following QHs of Tehsil Liaquatpur

- i. 1/L Abbasia (Cholistan)*
- ii. 2/L Abbasia (Cholistan)*
- iii. 2/R (Cholistan);*
- iv. 7/R (Cholistan);*
- v. Abbasia-I.*
- vi. Abbasia-II.*
- vii. Gulshan Farid (Cholistan)*
- viii. Haider Shah (Cholistan) and*
- ix. Head Farid (Cholistan)*

c) The Following QHs of Tehsil Khanpur.

- i. Bagho-Bahar*
- ii. Khanpur -I.*
- iii. Khanpur-II*

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iv. *Bhatta Sheikhan and*

v. *Nawan Kot.*

Of District Rahim Yar Khan

N.A-177 Rahim Yar Khan

a) *Zahid Pir M.C;*

b) *The following QHs of Tehsil Khanpur:-*

i. *Chachran Sharif*

ii. *Samokah;*

iii. *Jajja Abbasian.*

iv. *Garhi Ikhtiar Khan.*

c) *Kot Samaba Mohal excluding Kot Samaba Mohal PC of Tehsil Rahim Yar Khan*

d) *Rukhanpur QH of Tehsil Rahim Yar Khan.*

e) *The following PCs of Rajanpur HQ of Tehsil Rahim Yar Khan.*

i. *Ahsan Pur.*

ii. *Daulat Pur.*

iii. *Abad Pur and*

iv. *Thul Wazir;*

f) *The following PCs of Pallu Shah QH of Tehsil Rahim Yar Khan,*

i. *Pallu Shah; and*

ii. *Rang Pur.*

Of District Rahim Yar Khan.

NA-178 Rahim Yar Khan-iv

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- a) Ahmedpur Lamma MC.
- b) The following QH of Tehsil Rahim Yar Khan.
 - i. Taj Garh;
 - ii. Rajan Pur excluding following PCs.
 - a. Ahsan pur.
 - b. Daulatpur.
 - c. Abadpur and
 - d. Thul Wazir
 - iii. Pallu Sah QH excluding following PCs.
 - a. Pallu Shah and
 - b. Rang Pur.
 - iv. Trinda Sawai Khan HQ excluding following PCs.
 - a. Sultan pur.
 - b. Dari Azim Khan;
 - c. Bashiti and
 - d. Kotla Ayub Khan
- c. Following QH of Sadiqabad
Tehsil:-
 - i. Muhammad pur.

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- ii. *Shahbaz pur excluding Kasmani PC; and*
- iii. *Ahmedpur Lamma QH.*

Of District Rahim Yar Khan

Total 782370

NA-179 Rahim Yar Khan-v.

- a. *Rahim Yar Khan MC*
- b. *Trinda Sawai Khan MC*
- c. *Kot Samaba MC*
- d. *The following QH of Tehsil Rahim Yar Khan*
 - i. *Rahim Yar Khan-I.*
 - ii. *Rahim Yar Khan-II*
 - iii. *Kot Samaba Abadi and*
 - iv. *Bindor;*
 - v. *The following PCs of Trinda Sawai Khan QH*
 - a. *Sultanpur.*
 - b. *Dari Azam Khan.*
 - c. *Bashiti and*
 - d. *Kotla Ayub Khan;*
 - vi. *Kot Samaba PC of Kot Samaba Mohal QH.*

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Of Rahim Yar Khan.

NA-180 Rahim Yar Khan-VI. a. Sadiqabad M.C

b. The following QH of Tehsil

Sadiqabad:-

i. Sadiqabad-1

ii. Sadiqabad-II

iii. Tilo Goth

iv. Walhar

v. Bhong;

vi. Kot Sabzal and

vii. Qasmani PC of Shahbaz pur

QH

of District Rahim Yar Khan.

Annexure A/1

3. That the petitioner representation is regarding provincial constituencies of Punjab PP-255 and PP-257. Both the said constituencies and PP-256 are part of NA-175 and NA-176. The detail of areas of PP-255 and PP-257 are as under:-

PP-255 Rahim Yar Khan-1

a. The Following QH of Tehsil

Liaquatpur

i. Sidhuwali and

ii. Allah Abad

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b. The following PCs of Khan
Bela QH

- i. Fazil pur.
- ii. Bakhshu Banhar.
- iii. Thul Hamza.
- iv. Unran;
- v. Jhok Gulab Shah.
- vi. Bet Diwan; and
- vii. Banah Roya;

c. The Following PCs of
Tarukari QH-

- i. Taranda Gurgaje.
- ii. Chak No.133/NP.
- iii. Chak No.137/NP and
- iv. Ahmed Yar;

of District Rahim Yar Khan.

Total 373987

PP-257 Rahim Yar Khan-II

- a. Liaquatpur M.C
- b. The following QH of Tehsil
Liaquatpur
- i. 1/L Abbasia (Cholistan)
- ii. 2/L Abbasia (Cholistan)
- iii. 2/R (Cholistan)

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- iv. 7/R (Cholitan)
 - v. Abbasia-I;
 - vi. Abbasia-II;
 - vii. Gulshan Farid (Cholistan)
 - viii. Haider Shah (Cholistan)
 - and
 - ix. Head Farid (Cholistan).
 - c. The Tarukari QH excluding following P.Cs
 - i. Trinda Gugaij;
 - ii. Chak No.133/NP and
 - iii. Chak No.137/NP and
 - iv. Ahmed Yar;
 - d. The Following PCs of Pakka Laran QH
 - i. Arif Balouch.
 - ii. Chaharwala.
 - iii. Chak No.1/NP, Addl.
 - iv. Chak No.001/NP and
 - v. Ther Posti;
- of District Rahim Yar Khan.

Total

359997

Annexure A/2

4. That there are 13 seats of provincial assembly allocated to District Rahim Yar Khan i.e, PP-255 to PP-267 . The detail of Areas of each constituency of provincial assembly, District Rahim Yar Khan are attached as Annexure "C" .

5. That according to the draft of proposal of delimitation (annexure " A")following areas included in PP-255 against the relevant law and rules.

i. According to the rule 10 (4) of the Election Rules 2017, a patwar circle shall be basic unit of delimitation and it shall not be broken under any circumstances but the delimitation committee against this rule broken the patwar circle "Chaudhary" which consisting upon Mouza Muhammad Daha, Mouza Chaudhary , some area of Mouza Chaudhary excluded from PP-255 and included in PP-257 which census block code .It is clear cut violation of relevant rules. Delimitation of MC. annexure E.F.

ii. That the constituency of Punjab Provincial Assembly PP-255 is first constituency of Provincial Assembly of District Rahim Yar Khan .The Qanongoi "Trukri" consisting upon patwar circle Chak No . 1/A , Chak No 5/A, Chak No . 10/A , Chak No 50/A , Trukri. According to the draft proposal patwar circle Tanwari and Chaudhary included in PP-255 while the remaining patwar circle of said Qanoongoi

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included in PP-257 which is violation of the rules and law. The basic / first Unit of constituency PP-257 is Qanoongoi Trukri which area is divided into two constituencies i.e, PP-255 and PP-257. It is violation of Election Rules.

- 6. That according to the draft proposal for delimitation of constituencies there are variation in population between the constituencies. The population of PP-255 is 373987, PP-256 is 360737 and PP-257 is 359997 which is clear cut violation of the relevant rules. It is basic principle of delimitation that all the seats shall, as far as practicable delimited having regard to the distribution of population in Geographically compact areas, physical feature, existing boundaries of administrative unit, facilities of communication and public convenience and other cogent factor to ensure homogeneity in the creation of constituencies but this Principles is being violated according to the proposed draft of delimitation, the Bait Deewan included in PP-255 which creates the problem of public in connivance and also against the principle of Geographical compaction of areas.*
- 7. That the patwar circle Tanwari consisting upon Mouza Muradpur Sial and Mouza Tanwari which is geographically compact with patwar circle Chaudhary included in PP-255 which required to include in PP-257 the inclusion of total areas of Patwar Circle Chaudhary in PP-257 does not create the accede to the prescribed*

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07/04/2018

variation of population as well as just according to the Principle of geographically compaction. The details alongwith maps are attached herewith as Annexure "B" to "B/ ".

8. That the petitioner submitted that how the constituencies of Punjab Assembly PP-255 and PP-257 may kindly be delimited by accepting this representation.
9. That rule 10 (5) of Election Rules 2017, as far as the delimitation of constituencies of an assembly shall start from the north end of the District or as the case may be the agency and then proceed clock wise in zigzag manner in view that population amount the constituency of an assembly shall remained as close as practicable to the quota but violation of the this rules, the patwar circle of Qanongoi Trukri was partly excluded from PP-255 and the same was included in PP-257.
10. That while preparing draft proposal of delimitation the some areas of the Chak No.5-A, 18-A, 19-A and 20-A, which falls in Urban area were included wholly in PP-257 but by making discrimination with P.C Chaudhary the some part of the area excluded from PP-255 and included in 257.
 - a) That the patwar circle namely Chaudhary Tehsil Liaquatpur which is consisting upon Mouza Muhammad Daha and Mouza Chaudhary may be excluded from PP-255 and included into PP-257.

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- b) That both the Mouza Muhammad Daha and Chaudhary of Patwar circle Chaudhary may be included in PP-257. Because the revenue record (jamabandi) is same regarding both the Mouzas, the revenue patwari is also same and the mostly area of Mouza Chaudhay consisting upon agricultural land.
- c) The exclusion of the areas of P.C Chaudhary from PP-255 and inclusion it's in PP-257 is therefore, requested. For this inclusion the population ratio remains within the criteria which is prescribed by the Election Rules 2017.
- d) That the PC Tanwari may be excluded from PP-255 and include in PP-257.
- e) That the variation of population in case of acceptance of the representation of PP-255, PP-256 and PP-257 remained within prescribed limits which detail are as under:-

PP-255 Rahim Yar Khan-1 a. The Following QH of Tehsil

Liaquatpur

- i. Sidhuwali and
- ii. Allah Abad excluded P.C
Tanwari and Chaudhary

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b. *The following PCs of Khan
Bela QH*

- i. *Fazil Pur.*
- ii. *Bakhshu Banhar*
- iii. *Thull Hamza.*
- iv. *Unran.*
- v. *Jhok Gulab Shah*
- vi. *Bet Diwan and*
- vii. *Bana Roya*

c. *Tarukari QH-excluded PC .Trukari
of District Rahim Yar Khan*

Total **368493**

PP-256 Rahim Yar Khan -II

a. *The following QH of Tehsil*

Liaquat Pur

- i. *Shedani Sharif*
- ii. *Pakka Laran excluding
Following PCs.*
 - a. *Arif Balouch*
 - b. *Choharwala*
 - c. *Chak No 01/NP, Addl.*
 - d. *Chak No 001/NP and*
 - e. *Ther Posti,*
- iii. *Khan Bela excluding*

~~(12)~~

(13)

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following PCs.

- a. Fazilpur*
- b. Baksho Banhar.*
- c. Thul Hamza*
- d. Unran.*
- e. Jhok Gulab Shah*

f. Bet Diwan and

g. Banah Royap.

b. The following PCs of Samoka

QH of Tehsil Khanpur

- i. Chaudhri.*
- ii. Fatehpur Kamal.*
- iii. Ghazi Barar.*
- iv. Kot Shahan.*
- v. Samoka and*
- vi Wahgowan.*

Of District Rahim Yar Khan

Total

360737

PP-257 Rahim Yar Khan-II

a. Liaquatpur M.C

b. The following areas of Tehsil

Liaquatpur

i. following areas of Allah

Abad

(13)

(14)

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1. Chaudhary
 2. Tanwari.
 - ii. 1/L Abbasia (Cholistan)
 - iii. 2/L Abbasia (Cholistan)
 - iv. 2/R (Cholistan)
 - v. 7/R (Cholitan)
 - vi. Abbasia-I;
 - vii. Abbasia-II
 - viii. Gulshan Farid (Cholistan)
 - ix. Haider Shah (Cholistan)
 - ix. Head Farid (Cholistan) QH
 - c. The Tarukari QH
 - d. The Following PCs of Pakka Laran QH
 - i. Arif Balouch.
 - ii. Chaharwala.
 - iii. Chak No.1/NP, Addl.
 - iv. Chak No.001/NP and
 - v. Ther Posti;
- of District Rahim Yar Khan.

Total

365491

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The map as proposed by the petitioner in his representation of PP-255, PP-256 and PP-257 including relevant constituencies is attached herewith.

PRAYER

It is therefore, humbly prayed that by accepting this representation may kindly be accepted, in the interest of Justice.

 **Applicant**

Muhammad Iqbal Rais son of Rais Khuda Bakhsh
Caste Daha resident of Mouza Muhammad Daha Tehsil
Liaquat Pur Distrit Rahim Yar Khan

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