

To,  
The Secretary,  
Election Commission of Pakistan,  
Islamabad.

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**REPRESENTATION U/S 21 OF THE ELECTIONS ACT 2017 AGAINST  
THE PRELIMINARY DELIMITATION OF THE CONSTITUENCIES IN  
RESPECT OF PP-229, 230, 231 & 232 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 Assembly and Provincial Assemblies, the petitioner is hereby filing this objection petition against the aforementioned preliminary delimitation of Provincial Constituencies of PP-229 to 232 with proposed delimitation as under along with grounds:-

1. That the petitioner (Mr. Arshad Ali) is the law abiding citizen of Pakistan and is voter in Chak No. 431/EB, PC 431/EB, QH Gaggo, Tehsil Burewala, which is presently falling within PP-230 according to the preliminary delimitation vide notification dated 05.03.2018.
2. That the commission has published a notification regarding preliminary delimitation after its sincere thorough working and due commitment in the best interest of voters and system of democracy for the betterment of future of beloved country, but certain inconveniences, due to misreading of some geographical facts, are still evident from the delimitation in violation of Section 20 of the Election Act 2017 (hereinafter referred as "the Act") and

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rule 10 of the Election Rules 2017 (hereinafter referred as "the rules") which needs amendment / ratification in the best interest of the public.

3. That the preliminary delimitation in respect of PP-229 is not in consonance with the geographical nature of the area, and is in violation of creating constituencies which are geographically compact, facility of communication, public convenience and ensuring homogeneity in creation of constituencies as laid down in section 20 of the Act, which has adversely affected the constituencies from PP-229 to 232.
4. That Patwar Circles Chak Nos. 201/EB (population 12,718), 429/EB (population 6,951) and 431/EB (population 11,079) [total population of three PCs: 30,748] are excluded from PP-229 and included in PP-230 which are geographically, culturally and communication wise attached with PP-229, it would be more appropriate to include these PCs in PP-229 to make PP-229 according to the wishes of legislature as provided in the Act and Rules and make the constituency much easy, purposeful and a geographically small compact piece. As in present situation, PP-229 comprise of a deshaped constituency, having 55 kilometers long distance from one corner to the other, but due to proposed delimitation, the distance of PP-229 will be with 55 kilometers and it make the constituency a small compact piece. It is pertinent to mention here that the above mentioned pieces were previously also part of PP-229 (Vehari-I). According to Election laws, it is the basic responsibility of the delimitation committee that they will complete firstly the constituency PP-229 (Vehari-I) without observing any other constituency of

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the district, that considerable point is missing to formulate preliminary delimitation of PP-229. According to this suggestion the effect of population of PP-229 is  $381,047 + 30,748 = 411,795$ , which is itself according to the election laws read with other suggestions hereinafter.

5. **That in preliminary delimitation whole QH 3-R Burewal has been included in PP-229, however patwar circles, namely 146/EB (population 15,532), 150/EB (population 4,642) and 156/EB (population 6,054) [total population 26,228] of QH 3-R Burewala are situated at too far distance due to which the length of the constituency has been unjustifiably increased to 55 kilometers on one way travelling, but if the above mentioned PCs are excluded from PP-229 the shape of PP-229 will convert into a small geographical compact within distance of approx. 45 kilometers in this way length of PP-229 will be reduced by more than ten kilometer by proposed suggestion. It is pertinent to mention here that the QH 3-R Burewala was not previously the part of PP-229 (Vehari-I) before the subject preliminary delimitation. Further the residents of the said PCs are from different culture, language, race and way of living along with their business interaction, communication and irrigation from the other part of QH 3-R Burewala by nature, and its exclusion from PP-229 is in the public convenience and interest. As these above referred PCs, namely Chak Nos. 146/EB, 150/EB and 156/EB of QH 3-R Burewala, are nearer to PP-232, therefore needs to be included in PP-232 where their cultures, race, way of communication, style of living and geographical attachment are with QH machiwal, which is already falling in PP-232 according to preliminary**

delimitation. It is worth mentioning here that these three PCs were previously part of PP-232 (Vehari-IV) before publication of preliminary delimitation. According to this suggestion the effect of population of PP-232 is  $362,183 + 26,228 = 388,411$ , of population of PP-229 is  $381,047 + 30,748 = 411,795 - 26,228 = 385,567$ , which is itself according to the election laws.

6. That patwar Circles, namely 451/EB (population 10,012), 453/EB (9,499) [Total population of 2 PCs: 19,511], QH 3-R Burewala are adjacent to the burewala city which, according to the proposed delimitation, falls within the constituency of PP-229. According to the geographical the whole PP-229 is situated on the east north of Burewala City, but these two PCs are situated in west-south of Burewala city as well as the distance due to those two PCs of PP-229 was more than 50 kilometers approx. and by exclusion of these two PCs, the distance of the PP-229 will be reduced by almost 10 kilometers, these two PCs are separated by a railway track as well as Dehli-Mutan road from other part of the PP-229. Both these PCs are culturally, communication wise and distance wise connected with the MC burewala, therefore it will more appropriate to include PCs 451/EB and 453/EB of QH 3-R Burewala in PP-230. According to this suggestion the effect of population of PP-230 is  $372,851 + 19,511 = 392,362 - 30,748$  (para. 4) =  $361,614$  and population of PP-229 is  $381,047 - 19,511 - 26228$  (para. 5) =  $335,308 + 30,748$  (para. 4) =  $366,056$ , which is itself according to the election laws.

7. That according to preliminary delimitation, patwar circle Fazal Wah (population: 10,862) in QH Luddan is placed in PP-232, however almost all

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corners of the said PC are surrounded by the constituency of PP-231, which has unnecessarily increased the length of PP-232 and made it deshaped compact, which is in violation of the geographical division of constituencies as provided in section 20 of the Act. Therefore, it would be more appropriate to excluded PC Fazal Wah from PP-232 and include this PC, Farzal Wah, in PP-231. It is pertinent to mention here that this PC was previously part of Vehari-III (PP-231) before preliminary delimitation. According to this suggestion the effect of population of PP-232 is  $362,183 - 10,862 = 351,321 + 26,288$  (para. 5) = 377,549 and population of PP-231 is  $354,057 + 10,862 = 364,919$ , which is itself according to the election laws.

8. That the purposed suggestions make constituency of PP-229 to 232 more appropriate with geographical compact, geographical shape, close distance, uniformity of culture, uniformity of races, language and way of communications in all corners. The populations of constituency PP-229 to 232 after proposed suggestions are as under:

- a. PP. 229 = 366,056
- b. PP. 230 = 361,614
- c. PP. 231 = 364,919
- d. PP. 232 = 377,549

The population limits after the proposed amendment in preliminary delimitations will be according to the wishes of application election laws.

(Copy of the chart regarding proposed population division is attached as Annexure "D")

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**PRAYER:**

In the foregoing circumstances, it is humbly prayed that the preliminary delimitation of PP-229 to 232 may kindly be altered, modify and amend in the following manner:-

- a) By excluding Patwar Circles 146/EB, 150/EB and 156/EB of QH 3-R Burewala from PP-229, it may kindly be included in PP-232;
- b) By excluding Patwar Circles 201/EB, 429/EB and 431/EB QH Gaggo from PP-230, it may kindly be included in PP-229;
- c) By excluding Patwar Circles 451/EB, 453/EB, QH 3-R Burewala from PP-229, it may kindly be included in PP-230; and
- d) By excluding patwar circle Fazal Wah in QH Luddan from PP-232, it may kindly be included in PP-231.



**(Muhammad Arshad Ali S/O Muhammad Subhan)**  
Chak No. 431/EB, Tehsil Burewala, District Vehari.

Through



**(RAO ABDUR RAHEEM)**  
Advocate High Court