

To,

The Secretary,
Election Commission of Pakistan,
Islamabad.

Handwritten signature and date: 03/03/2018

Subject:

**REPRESENTATION U/S 21(3) OF
THE ELECTION ACT, 2017
AGAINST THE PRELIMINARY
DELIMITATION OF THE
CONTITUENCY IN RESPECT OF
NA-162 (PP-229 & 230), NA-163
(PP-231 & 232) NA-164 (PP-233 &
234) AND NA-165 (PP-235-236)
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

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preliminary delimitation of national and provincial constituencies NA-162 (PP-229 & 230), NA-163 (PP-231 & 232) NA-164 (PP-233 & 234) AND NA-165 (PP-235-236) as under:

- i. 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.
- ii. That geographically compact area means which naturally and politically division of the earth seems to be one unit. Unfortunately the preliminary delimitation in respect of NA-162 (PP-229 & 230), NA-163 (PP-231 & 232) NA-164 (PP-233 & 234) AND NA-165 (PP-235-236) is not inconsonance with the geographical

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nature of the area. A cursory view of the map itself indicates that the proposed delimitation is more appropriate in the light of this principle rather than the preliminary notified delimitation. In fact the delimitation of NA-163 Vehari-II, which has been made totally contrary to the section 20 of Act ibid and Rule 12 of the Election Rules, 2017, which affected the entire delimitation of 3 NA's and consequently PP's. The principle of northern end has been taken while delimiting NA-162, whereas the same principle has been overlooked, even it cannot be implemented for rest of the constituencies. NA-163 Vehari-II has been totally delimited all along Satluj River. The said constituency can only be seen in the map but it would be

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difficult to survive on the ground. Across the river the boundary called "Kacha", and the residents of such area have relations with upper portion of said district instead of along the river. Accordingly they move upwards, even some of the inhabitants of Kacha area have two residences one in Kacha and the other in settled area of upper side. If the constituency of NA-163 is made up spreading over the entire Kacha area, it is neither practicable nor feasible. In the rainy season when flood comes, the residents of that area move to upper/settled area, due to which the previous delimitation was made while keeping in mind this principle but unfortunately the same has been overlooked. Geographically compact area can be separated

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equally among the four NA's, if the principle of northern end is made applicable in all the cases and not only in respect of NA-162.

- iii. 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 such as rivers and mountains which attract in this case and the suggestion is according to this rule.
- iv. That patwar circle 3-R Burewala is totally a separate unit geographically and the residents of that patwar circle having relations for the decades with the residents of NA-163, whereas the residents of Patwar

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Circle Umar Pur having agnation with the adjacent patwar circle of the constituency NA-162, therefore, the natural affiliation of 3-R patwar circle is with NA-163, whereas the closeness of Umer Pur is with NA-162 spreading over the last many decades.

- v. That most important fact which determines all other factors is facility of communication and public convenience. In the instant case public road transport facilities of patwar circle Umar Pur are with NA-162 instead of NA-163 and if this patwar circle after detaching from 162 is made part of 163, it will take a long time to make developments for communication between the proposed constituency and

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resultantly all the inhabitants shall suffer an irreparable loss on account of education and health. On this score alone, the demand of petitioners is prima facie and merits consideration.

- vi. 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 of patwar circle Umar Pur have close relations with the residents of adjacent patwar circles, so this homogeneity demands that patwar circle Umar Pur may be included in NA-162 & 3-R patwar circle may be included in NA-162 to facilitate the residents of that patwar circles.

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vii. That the rule of northern end has also been violated in all the constituencies except NA-162, which is against the natural justice. All the laws are made for the welfare/facilitation of general public and not to bother the public.

viii. It is worthwhile to mention here that the population of Vehari district has not been so increased due to which a new constituency was required to be delimited and only minor changes were required but unfortunately the delimitation of 3 NA's constituencies has been disturbed. Contrary to this in other districts where there is minor changes involved, only one patwar circle or two have been excluded/included from that constituency. The example of District

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Chakwal is very important and in this way Article 25 of the Constitution of Islamic Republic of Pakistan, 1973 has been violated. There are many other examples in the proposed notification of delimitation, where the previous delimitation was kept intact with slightly amendments, accordingly the petitioners have to be treated at par. All the citizens of Pakistan are entitled for equal treatment but this principle has not been adhered to while delimiting the constituencies of Vehari district.

| Preliminary Delimitation | | | Proposed Delimitation | | |
|--------------------------|--|------------|-----------------------|---|------------|
| Constituency No. | Description | Population | Constituency No. | Description | Population |
| NA-162 Vehari-I | a. Burewala MC b. The following QH of Burewala Tehsil:- i. Burewala-I ii. 3-R (Burewala) iii. Sheikh Fazil iv. Chak No.215/EB; v. Gaggo; and vi. Burewala-II of | 753,898 | NA-162 Vehari-I | a. Burewala MC b. The following QHs of Burewala Tehsil:- i. Burewala-I ii. Burewala-II iii. Umar Pur iv. Sheikh Fazil v. Chak No.215/EB; v. Gaggo; and | 732,361 |

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| Vehari District. | | of Vehari District. | | |
|------------------|---|---------------------|--|----------------|
| Total | 753,898 | Total | 732,361 | |
| PP-229 | The following QHs of Tehsil Burewala:- i. Sheikh Fazil ii. Chak No.215/EB iii. 3-R (Burewala) iv. Gaggo excluding following PCs: i. Chak No.201/E-B ii. Chak No.429/E-B; iii. Chak No.431/E-B; and Chak No.255/E-B of District Vehari. | 381,047 | PP-229 (a) The following QHs of Tehsil Burewala:- i. Sheikh Fazil ii. Chak No.215/EB iii. Gaggo iv. Umar Pur excluding following PCs: 36KB, 39KB, 285KB, 291KB & Jamlara of Vehari District. | 357,286 |
| | Total | 381,047 | Total | 357,286 |
| PP-230 | (a) Burewala MC; (b) The following QHs of Tehsil Burewala:- i. Burewala-I ii. Burewala-II (c) The following Pcs of Gaggo QH of Tehsil Burewala-II; i. Chak No.201/E-B ii. Chak No.429/E-B; iii. Chak No.431/E-B; and Chak No.255/E-B of District Vehari. | 372,851 | PP-230 (a) Burewala MC; (b) The following QHs of Tehsil Burewala:- i. Burewala-I ii. Burewala-II (c) The following PCs of Umar Pur QH; 36KB, 39KB, 285KB, 291KB & Jamlara of Vehari District. | 375,075 |
| | Total | 372,851 | Total | 375,075 |
| NA-163 Vehari-II | (a) The following QH of Tehsil Burewala:- i. Umar Pur; ii. Joiya (b) The following QH of Tehsil Vehari: i. Luddan ii. Machiwala iii. Kusam Sar: (c) The following Pcs of Karampur QH of Tehsil Mailsi: i. Hassan Shah ii. Karampur iii. Borana Khas iv. Dhalu; and (d) Karampur T.C | 716,240 | NA-163 Vehari-II (a) The following QH of Tehsil Burewala:- i. 3R (Burewala) ii. Joiya (b) The following QH of Tehsil Vehari: i. Luddan ii. Machiwala iii. Kusam Sar (c) The following Pcs of 3R QH: i. PC-178 ii. PC-186 of Vehari District | 716,238 |

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| | (old); of Vehari District | | | | |
|--------|---|----------------|--------|---|----------------|
| | Total | 716,240 | | Total | 716,238 |
| PP-231 | (a) The following QH of Tehsil Burewala: i. Umarpur; ii. Joiya; (b) The following PCs of Luddan QH of Tehsil Vehari: i. 056/KB; ii. Dad Kamera; iii. Khichi; iv. Lakha; v. Lal-Deh; vi. Luddan; vii. Mehru Balooch viii. Salol; and ix. Tajwana; (c) The following PCs of Machianwala QH of Tehsil Vehari:- i. 058/KB and ii. Allah Abad; of District Vehari. | 354,057 | PP-231 | (a) Joiya QH of Tehsil Burewala: (b) Luddan QH of Tehsil Vehari: (c) The following PCs of Machianwala: i. 58/KB; ii. 479EB and iii. Allah Abad (d) The following PCs of Kusamsar QH: i. Karimwah ii. Qadirabad iii. Mustafaabad iv. Faizwah | 367,213 |
| | Total | 354,057 | | Total | 367,213 |
| PP-232 | (a) The following QH of Tehsil Vehari: i. Kusam Sar; ii. Machianwala - excluding following PCs; 1. 058/KB; and 2. Allah Abad; (b) Luddan QH excluding following PC's of Tehsil Vehari: i. 056/KB; ii. Dad Kamera; iii. Khichi; iv. Lakha; v. Lal-Deh; vi. Luddan; vii. Mehru Baloch viii. Salol; and ix. Tajwana; (c) The following PCs of Karampur QH of | 378,186 | PP-232 | (a) The following QH of Tehsil Burewala: i. 3R (b) Exclude the following PCs of Machianwala: i. 58/KB; ii. 479/EB iii. Allah Abad (c) Kusamsar QH excluding following PCs: i. Qadir Abad ii. Karimwah iii. Mustafaabad iv. Faizwah (d) The following PCs of 3-R QH of Vehari: i. 178/EB ii. 186/EB of District Vehari | 349,025 |

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|--------|--|----------------|--------|---|----------------|
| | Mailsi Tehsil:- i.Hassan Shah; ii.Karampur; iii.Borana Khas; and iv.Dhalu; and (d)Karampur TC (old); of district Vehari. | | | | |
| | Total | 378,186 | | Total | 349025 |
| NA-164 | (a)Vehari MC; (b)The Following QH of Tehsil Vehari: i.Chak No.3-R (Vehari) ii.10-L; iii.Vehari-II; iv.Vehari-I; (c)Karampur QH of Tehsil Mailsi excluding following PCs:- i.Hassan Shah; ii.Karampur iii.Borana Khas; and iv.Dhalu; (d)7/R (Garah More) QH of Tehsil Mailsi; Of Vehari District. | 726,974 | NA-164 | (a)Vehari MC; (b)The Following QH of Tehsil Vehari: i.10-L; ii.Vehari-II; iii.Vehari-I; (c)Karampur QH of Tehsil Mailsi (d)Karampur TC (e)3-R QH Vehari excluding following PCs i.178/EB ii.186/EB (f)7/R (Garah More) QH of Tehsil Mailsi; Of Vehari District. | 733,271 |
| | Total | 726,974 | | Total | 733,271 |
| PP-233 | (a)The following QH of Tehsil Vehari: i.Chak No.3-R; and ii.10-L; (b)7/R Garah More QH of Tehsil Mailsi; Of District Vehari. | 378,186 | PP-233 | (a)The following QH of Tehsil Vehari: i.10-L; (b)7/R Garah More QH of Tehsil Mailsi; (c)3-R QH of Vehari District excluding following PCs: i.178/EB ii.186/EB Of District Vehari. | 352,831 |
| | Total | 378,186 | | Total | 352,831 |
| PP-234 | (a)Vehari MC; (b) The following QH of Tehsil Vehari: i.Vehari-I ii. Vehari-II (c)Karampur QH of Tehsil Mailsi excluding following | 348,788 | PP-234 | (a)Vehari MC; (b) The following QH of Tehsil Vehari: i.Vehari-I ii. Vehari-II iii. Karampur TC (c)Karampur QH excluding following | 380,440 |

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|---------------------------|---|----------------|---------------------------|---|----------------|
| | PCs: i.Hassan Shah ii.Karampur iii.Borana Khas; and iv.Dhalu of District Vehari | | ? | PCs of Tehsil Mailsi: i. Alampur ii. Sargana of District Vehari | |
| | Total | 348,788 | | Total | 380,440 |
| NA-165 Vehari | (a)Mailsi MC; (b)Jalla Jeem TC(old); (c)Tibba Sultan Pur TC (old); (d)The following QHs of Tehsil Mailsi:- i.Mailsi-I; ii.Mailsi-II iii.Fatehpur; iv.Lal Sagu; v.Mahfoozabad; vi.Tibba Sultan Pur; and vii.Mitro; of Vehari District | 700,334 | NA-165 Vehari | (a)Mailsi MC; (b)Jalla Jeem TC(old); (c)Tibba Sultan Pur TC (old); (d)The following QHs of Tehsil Mailsi:- i.Mailsi-I; ii.Mailsi-II iii.Fatehpur; iv.Lal Sagu; v.Mahfoozabad; vi.Tibba Sultan Pur; and vii.Mitro; (e)The following PCs of Karam Pur of Tehsil Mailsi: i.Alampur; ii.Sargana of Vehari District | 715,576 |
| | Total | 700,334 | | Total | 715,576 |
| PP-235 Vehari- VII | (a)The following QHs of Tehsil Mailsi:- i.Tibba Sultan Pur; ii.Lal Sagu; iii.Mitro; and iv.Mailsi-II; (b)Tibba Sultan Pur T.C (old); Of District Vehari. | 350,454 | PP-235 Vehari- VII | (a)The following QHs of Tehsil Mailsi:- i.Tibba Sultan Pur; ii.Lal Sagu; iii.Mitro; and iv.Mailsi-II; (b)Tibba Sultan Pur T.C (old); (c)Sargana PC of Karampur QH of Tehsil Mailsi Of District Vehari. | 357,138 |
| | Total | 350,454 | | Total | 357,138 |
| PP-236 Vehari- VIII | (a)Mailsi MC; (b)Jalla Jeem T.C. (old) (c)The following QH of Tehsil Mailsi:- i.Mailsi-I; ii.Fatehpur; and; iii.Mahfoozabad; of District Vehari | 349,880 | PP-236 Vehari- VIII | (a)Mailsi MC; (b)Jalla Jeem T.C. (old) (c)The following QH of Tehsil Mailsi:- i.Mailsi-I; ii.Fatehpur; and; iii. Mahfoozabad; (d)PC Alampur of Karampur QH of Tehsil | 358,438 |

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| | | | | Mailsi of District Vehari | |
| | | Total | 349,880 | | Total 358,438 |

2. That in the light of above legal/factual position, the following amendments in the preliminary delimitation of NA-162 (PP-229 & 230), NA-163 (PP-231 & 232) NA-164 (PP-233 & 234) AND NA-165 (PP-235-236) are suggested:

| Sr.# | Constituency No. | Description | Population |
|------|--------------------|---|----------------|
| i. | NA-162 Vehari-I | a. Burewala MC b. The following QHs of Burewala Tehsil:- i. Burewala-I ii. Burewala-II iii. Umar Pur iv. Sheikh Fazil v. Chak No.215/EB; v. Gaggo; and of Vehari District. | 732,361 |
| | | Total | 732,361 |
| ii. | PP-229 | (a) The following QHs of Tehsil Burewala:- i. Sheikh Fazil ii. Chak No.215/EB iii. Gaggo iv. Umar Pur excluding following PCs: 36KB, 39KB, 285KB, 291KB & Jamlara of Vehari District. | 357,286 |
| | | Total | 357,286 |
| iii. | PP-230 | (a)Burewala MC; (b)The following QHs of Tehsil Burewala:- | 375,075 |

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| | | | |
|----|---------------------|--|----------------|
| | | <p>i. Burewala-I ii. Burewala-II (c) The following PCs of Umar Pur QH; 36KB, 39KB, 285KB, 291KB & Jamlara of Vehari District.</p> | |
| | | Total | 375,075 |
| iv | NA-163 Vehari-II | <p>(a) The following QH of Tehsil Burewala:- i. 3R (Burewala) ii. Joiya (b) The following QH of Tehsil Vehari: i. Luddan ii. Machiwala iii. Kusam Sar (c) The following Pcs of 3R QH: i. PC-178 ii. PC-186 of Vehari District</p> | 716,238 |
| | | Total | 716,238 |
| v | PP-231 | <p>(a) Joiya QH of Tehsil Burewala: (b) Luddan QH of Tehsil Vehari: (c) The following PCs of Machianwala: i. 58/KB; ii. 479EB and iii. Allah Abad (d) The following PCs of Kusamsar QH: i. Karimwah ii. Qadirabad iii. Mustafaabad iv. Faizwah</p> | 367,213 |
| | | Total | 367,213 |
| vi | PP-232 | <p>(a) The following QH of Tehsil Burewala: i. 3R (b) Exclude the following PCs of Machianwala: i. 58/KB; ii. 479/EB iii. Allah Abad (c) Kusamsar QH excluding following</p> | 349025 |

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| | | | |
|------|--------|--|----------------|
| | | <p>PCs:</p> <p>i. Qadir Abad</p> <p>ii. Karimwah</p> <p>iii. Mustafaabad</p> <p>iv. Faizwah</p> <p>(d) The following PCs of 3-R QH of Vehari:</p> <p>i. 178/EB</p> <p>ii. 186/EB</p> <p>of District Vehari</p> | |
| | | Total | 349025 |
| vii | NA-164 | <p>(a) Vehari MC;</p> <p>(b) The Following QH of Tehsil Vehari:</p> <p>i. 10-L;</p> <p>ii. Vehari-II;</p> <p>iii. Vehari-I;</p> <p>(c) Karampur QH of Tehsil Mailsi</p> <p>(d) Karampur TC</p> <p>(e) 3-R QH Vehari excluding following PCs</p> <p>i. 178/EB</p> <p>ii. 186/EB</p> <p>(f) 7/R (Garah More) QH of Tehsil Mailsi;</p> <p>Of Vehari District.</p> | 733,271 |
| | | Total | 733,271 |
| viii | PP-233 | <p>(a) The following QH of Tehsil Vehari:</p> <p>i. 10-L;</p> <p>(b) 7/R Garah More QH of Tehsil Mailsi;</p> <p>(c) 3-R QH of Vehari District excluding following PCs:</p> <p>i. 178/EB</p> <p>ii. 186/EB</p> <p>Of District Vehari.</p> | 352,831 |
| | | Total | 352,831 |
| ix | PP-234 | <p>(a) Vehari MC;</p> <p>(b) The following QH of Tehsil Vehari:</p> <p>i. Vehari-I</p> <p>ii. Vehari-II</p> <p>iii. Karampur TC</p> <p>(c) Karampur QH excluding following PCs of Tehsil Mailsi:</p> <p>i. Alampur</p> <p>ii. Sargana</p> <p>of District Vehari</p> | 380,440 |
| | | Total | 380,440 |

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|---|-----------------------|--|----------------|
| x | NA-165 Vehari | (a)Mailsi MC; (b)Jalla Jeem TC(old); (c)Tibba Sultan Pur TC (old); (d)The following QHs of Tehsil Mailsi:- i.Mailsi-I; ii.Mailsi-II iii.Fatehpur; iv.Lal Sagu; v.Mahfoozabad; vi.Tibba Sultan Pur; and vii.Mitro; (e)The following PCs of Karam Pur of Tehsil Mailsi: i.Alampur; ii.Sargana of Vehari District | 715,576 |
| | | Total | 715,576 |
| | PP-235 Vehari-VII | (a)The following QHs of Tehsil Mailsi:- i.Tibba Sultan Pur; ii.Lal Sagu; iii.Mitro; and iv.Mailsi-II; (b)Tibba Sultan Pur T.C (old); (c)Sargana PC of Karampur QH of Tehsil Mailsi Of District Vehari. | 357,138 |
| | | Total | 357,138 |
| | PP-236 Vehari-VIII | (a)Mailsi MC; (b)Jalla Jeem T.C. (old) (c)The following QH of Tehsil Mailsi:- i.Mailsi-I; ii.Fatehpur; and; iii. Mahfoozabad; (d)PC Alampur of Karampur QH of Tehsil Mailsi of District Vehari | 358,438 |
| | | Total | 358,438 |

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PRAYER

Keeping in view the position stated above, it is requested that proposed amendments in NA-162 (PP-229 & 230), NA-163 (PP-231 & 232), NA-164 (PP-233 & 234) and r.A-165 (PP-235 & 236) which have been made purely in the public interest according to the Act and Rules may kindly be accepted and delimitation of above national/provincial constituencies may very kindly be amended accordingly. Copies of census data, extracts of voter lists and maps are enclosed for perusal, please.

G.M.M.

G.M.M.

M. Iftikhar

Muhammad Iftikhar

Son of Sabir Hussain

R/o P.O Burewala, Chak No.511 EB,
Tehsil Burewala, District Vehari.
Vote/Silsa No. 586, Chak No.523 EB,
Tehsil Burewala and District Vehari.

Through

Rana Ad Kamran

RANA AD KAMRAN

Advocate High Court

Multan

Cell # 0300-4965264

CC # 668

Ghulam Muhammad Khan

GHULAM MUHAMMAD KHAN

Advocate High Court

Islamabad.

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