

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



**Subject: REPRESENTATION U/S-21(3) OF THE ELECTION, 2017 AGAINST THE
PRILIMINARY DELINITION OF THE CONSTITUENCIES IN RESPECT OF NA-160
& NA-161 AND PP-224 TO PP-228 NOTIFIED ON 05-MARCH-2018.**

Respected Sir,

With reference to Notification F.8(3)/2018-Elec-I dated 05-March-2018, regarding the publication of preliminary report of delimitation of constituencies of National and Provincial Assemblies, I hereby filed objections against the above set preliminary delimitation of National and provincial Constituencies NA-160 & NA-161 and PP-224 to PP-228 as under:-

1. That the principles laid down in S-20 of the election act, 2017 and rule 12 of the election rule, 2017 have not been complied within stricto-senso.
2. That the geographically area means which naturally and politically division of the earth seems to be one unit. Unfortunately the notified preliminary delimitation in respect of NA-160 & NA-161 and PP-224 to PP-228 is not inconsonance with the geographical nature of the area. A cursory view of the proposed maps itself indicates that this delimitation is more appropriate in light of this principle rather than preliminary notified delimitation. Infact the delimitation of NA-160 which has been made contrary to section of act ibid and the election rule, 2017 which affect the small portion of population of patwar circle Fatehpur of Qanungo halqa 34/M of Dunya pur Tehsil. That this patwar circle Fatehpur was previously included in the old delimitation of NA-154 (now is notified as NA-161). If this patwar circles Fatehpur included in the notified the NA-161 then all the Purposes of the delimitation will be achieved regarding the facilities of communication, Public Convenience and other factors to ensure homogeneity in the creation of delimitation in the constituencies.

3. That the notified draft of the constituencies of the District Lodhran was drafted by violating the mandatory rule 10(5), election rule, 2017, in which starting was not started from the Northern end of the District Lodhran in clock wise manner. Copies of notified draft is attached here with annexure as: **B**
4. That according to rule 10(5) of election rule, 2017 the delimitation of the constituencies shall start from the Northern end of the District and proceed clockwise in Zig-Zag manner, so this rule is overlooked in the preliminary draft of the provincial constituencies i.e. PP-224 to PP-228. So according to the set rule starting point should be from the Northern end of the District Lodhran for the proposed provincial constituencies are as under:-

No. and name of constituency	Extent of constituency	Population
PP-224 Lodhran-i (Old PP-207)	(a) Dunyapur Town Committee P-15	41575
	(b) The following Qanungo Halqas of Dunyapur Tehsil :- (i) 2-L P-1 125695 (ii) Dunyapur P-11 109273 (iii) 34/M excluding the following Patwar Circles:- P-4 107681 42752 64929	64929
	(a) Chak No 8/M P-4 5664 (b) Chak No 9/M P-4 8152 (c) Chak No 14/M P-5 15158 (d) Chak No 23/M P-7 5839 (e) Chak No 235/WB P-6 7939 of Lodhran District. 42752	341472
PP-225 Lodhran ii (Old PP-208)	(a) Dhanote Town Committee P-22	24143
	(b) The following Patwar Circles of 34/M Qanungo Halqas of Dunyapur Tehsil :- (i) Chak No 8/M P-4 5664 (ii) Chak No 9/M P-4 8152 (iii) Chak No 14/M P-5 15158 (iv) Chak No 23/M P-7 5839 (v) Chak No 235/WB P-6 7939 42752	42752
	(c) 12-L Qanungo Halqas of Dunya pur Tehsil P-8 110789 (d) Amirpur Sadat Qanungo Halqa of Karor Pacca Tehsil P-15 118487 (e) The Following Patwar Circles of Karor pacca Qanungo Halqa of Karor Pacca Tehsil:- (i) Pakka P-26 4062 (ii) Lal Baghali P-26 7865 11927	11927
	(f) The Following Patwar Circles of Dakhana Gharo Qanungo	

	Halqa of Karor pacca Tehsil:- (i) Rind Jada P-21 12171 (ii) Chowki Soba Khan P-18 11792 Of Lodhran District. <u>23963</u>	23963 332061
PP-226 Lodhran-iii (Old PP-209)	(a) Karor Pacca Municipal Committee P-22 (b) The following Qanungo Halqas of Karor Pacca Tehsil:- P-18 129586 (i) Dhakhan excluding the following Patwar Circles :- P-18 23963 <u>105623</u> (a) Rind Jada P-21 12171 (b) Chowki Soba Khan P-18 11792 <u>23963</u> (c) Karor Pacca Qanungo Halqa excluding the following Patwar Circles:- P-24 146582 (a) Pakka P-26 4062 11927 (b) Lal Baghali P-26 7865 <u>134655</u> of Lodhran District <u>11927</u>	82141 105623 134655 347997

PP-227 Lodhran-iv (Old PP-210)	(a) Lodhran Municipality P-33 (b) The following Qanungo Halqas of Lodhran Tehsil:- (i) Lodhran excluding the following Patwar Circles :- P-35 138676 (a) kotha Utera P-37 11999 25578 (b) Haweli Nasir P-36 13579 <u>113098</u> <u>25578</u> (ii) Bhuteji P-27 of Lodhran District.	117851 113098 112220 343169
PP-228 Lodhran v (Old PP-211)	The Following Qanungo Halqas of Lodhran Tehsil :- (i) Rajapur P-38 144117 (ii) Rawani P-41 75481 (iii) Gogran P-30 11323 <u>335921</u>	335921

The Letter "P" Shows the page of Census data of District Lodhran.

4. That by following the rule 10(5) of election rules, 2017 inclusion and exclusion of the population from the constituencies were adopted, in the light of starting reference from the Northern end of the District Lodhran in this way, the only two patwar circle of Qanungo Halqa Lodhran i.e. patwar

circle Kotha utera and Hawaili Nasir Khan were excluded from the previous (Old) PP-210 (now proposed as PP-227-Lodhran-iv) and included these patwar circles (Kotha utera and Hawaili Nasir Khan) in previous /old PP-209 (now proposed as PP-226-Lodhran-iii) and the rest population of the provincial constituencies of the District Lodhran will remain same as previous/old PP-207,PP-208 and PP-211. Now these proposed provincial constituencies will be as PP-224 Lodhran-i, PP-225 Lodhran-ii, and PP-228-Lodhran-v in the light of the postulated law and rules of the election act, 2017.

5. That all the delimitation of the constituencies of the District Lodhran i.e. NA-160 & NA-161 and PP-224 to PP-228 are proposed in the light of parameter regarding to the distribution of the population in geographical compact area, Physical features, Existing boundaries of the Administrative units, Facilities of communication and public convenience and other cognate features by ensuring homogeneity in, as for as possible, way.

6. That the most important factor which determines all other factors is facility of communication and public convenience in the instant proposed draft of the constituencies (NA-160 & NA-161 and PP-224 to PP-228), the inhabitants of the area shall not suffer any irreparable loss on any account i.e. education and health etc. The demand of the petitioner is prima-facie and merits considerations.

7. That there are many other examples in the proposed notification of the delimitation, where previous/ old delimitation were kept intact with the slightly amendments, accordingly the petitioner has 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 the District Lodhran.

8. That in the light of above legal/factual position, the following amendments in the preliminary notified delimitation of NA-160 & NA-161 and PP-224 to PP-228 of the District Lodhran are Suggested as :

No. and name of constituency	Extent of constituency	Population
NA-160 Lodhran	(a) Kehror Pacca Tehsil (b) Dunyapur Town Committee	

	<p>(c) The following Qanungo Halqas of Dunyapur Tehsil:-</p> <p>(i) Dunyapur</p> <p>(ii) Chak 12-L</p> <p>(d) The following Patwar Circles of 34/M Qanungo Halqa of Dunyapur Tehsil:-</p> <p>(i) Chak 8/M</p> <p>(ii) Chak 9/M</p> <p>(iii) Chak 14/M</p> <p>(iv) Chak 23/M</p> <p>(v) Chak 28/M</p> <p>(vi) Chak 38/M</p> <p>(vii) Chak 235/WB</p>	823801
NA-161 Lodhran	<p>(a) Lodhran Tehsil</p> <p>(b) 2-L Qanungo Halqa of Dunyapur Tehsil</p> <p>(c) 34/M Qanungo Halqa of Dunyapur Tehsil Excluding the following Patwar Circles:-</p> <p>(i) Chak 8/M</p> <p>(ii) Chak 9/M</p> <p>(iii) Chak 14/M</p> <p>(iv) Chak 23/M</p> <p>(v) Chak 28/M</p> <p>(vi) Chak 38/M</p> <p>(vii) Chak 235/WB</p>	876819

No. and name of constituency	Extent of constituency	Population
PP-224 Lodhran-i	<p>(a) Dunyapur Town Committee</p> <p>(b) The following Qanungo Halqas of Dunyapur Tehsil :-</p> <p>(i) 2-L</p> <p>(ii) Dunyapur</p> <p>(iii) 34/M excluding the following Patwar Circles:-</p> <p>(i) Chak No 8/M</p> <p>(ii) Chak No 9/M</p> <p>(iii) Chak No 14/M</p> <p>(iv) Chak No 23/M</p> <p>(v) Chak No 235/WB of Lodhran District.</p>	341472
PP-225 Lodhran ii	<p>(a) Dhanote Town Committee</p> <p>(b) The following Patwar Circles of 34/M Qanungo Halqas of Dunyapur Tehsil :-</p> <p>(i) Chak No 8/M</p> <p>(ii) Chak No 9/M</p> <p>(iii) Chak No 14/M</p> <p>(iv) Chak No 23/M</p> <p>(v) Chak No 235/WB</p>	

	<p>(c) 12-L Qanungo Halqas of Dunya pur Tehsil (d) Amirpur Sadat Qanungo Halqa of Karor Pacca Tehsil (e) The Following Patwar Circles of Karor pacca Qanungo Halqa of Karor Pacca Tehsil:- (i) Pakka (ii) Lal Baghali</p> <p>(f) The Following Patwar Circles of Dakhana Gharo Qanungo Halqa of Karor pacca Tehsil:- (i) Rind Jada (ii) Chowki Soba Khan Of Lodhran District.</p>	332061
PP-226 Lodhran-iii	<p>(a) Karor Pacca Municipal Committee (b) The following Qanungo Halqas of Karor Pacca Tehsil:- (i) Dhakkan excluding the following Patwar Circles :- (i) Rind Jada (ii) Chowki Soba Khan</p> <p>(c) Karor Pacca Qanungo Halqa excluding the following Patwar Circles:- (i) Pakka (ii) Lal Baghali of Lodhran District</p>	347997

PP-227 Lodhran-iv	<p>(a) Lodhran Municipality (b) The following Qanungo Halqas of Lodhran Tehsil:- (i) Lodhran excluding the following Patwar Circles :- (a) kothia Utera (b) Haweli Nasir</p> <p>(ii) Bhuteji of Lodhran District.</p>	343169
PP-228 Lodhran v	<p>The Following Qanungo Halqas of Lodhran Tehsil :- (i) Rajapur (ii) Rawani (iii) Gogran</p>	335921

PRAYER

Keeping in view of the positions stated above, it is requested that proposed amendments in NA-160 & NA-161 and PP-224 to PP-228 of the District Lodhran which have been made purely in the public interest according to the act and rules, may kindly be accepted and delimitation of above said National/Provincial constituencies may very kindly be amended accordingly.

Copies of CNIC and extract of voter list of the petitioner, copies of census data, copies of preliminary notified delimitation of district Lodhran copies of proposed delimitation with the maps are enclosed for perusal, please

Petitioner

M. Mohsin
Muhammad Mohsin Tufail

S/o Chaudary Muhammad Tufail

Chak Gujranwala Moza Rawani

Tehsil District Lodhran


Through

Muhammad Tufail Thakar

Advocate High Court

District Courts Lodhran

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