

BEFORE THE ELECTION COMMISSION OF PAKISTAN

ISLAMABAD

Representation Petition No. _____ / 2018

Before:

The Secretary (ECP) Secretariat, Election House,
Constitution Avenue, G-5/2, Islamabad.

On behalf of:

Abdul Razaq son of Azeem Bakhsh, resident of Chah Fazal
Dad Wali, Tehsil Liaqat Pur, District Rahim Yar Khan

...Applicants/Petitioners

REPRESENTATION UNDER SECTION 21(3) OF THE
ELECTION ACT 2017 READ WITH RULE 11 (4) OF THE
ELECTION RULES 2017 FOR THE DE-LIMITATION OF
THE PROPOSED CONSTITUENCIES NO.NA-175 and NA-
176, RAHIM YAR KHAN IN THE PRELIMINARY REPORT

ABSTRACT

Respectfully Sheweth:

Being the concerned voter and representative of the subject

Constituency it is prayed as follows:

(a) That the petitioner is enrolled as a voter in the

- (b) That the preliminary delimitation of constituencies has been published through public notice by the respondent. Copy of notice is attached.
- (c) That the preliminary delimitation of constituency NO.NA-176, rahim yar khan is against law, facts, rules, procedures, principles and provisions as well as sections laid down in the delimitation Act 2017.
- (d) That there is gross violation of laws, rules, principles and sections of delimitation rules 2017.
- (e) That the delimitation of NA-176 along with NA-175 Rahim Yar Khan is liable to be rectified to the extent of prayer of the petitioners to meet the ends of justice and to be in accordance with rules, provisions, laws sections laid down in the delimitation Act 2017.

That the following patwar circles, of QH Nawa Kot

The Patwar Circle mehmoood kot	=	7279
Mehmood shah PC	=	9135
Nawa kot azafi	=	8145
Nawa kot PC	=	10781
Tahir shaheed	=	10618

Collectively having population of 45958 be excluded from

NA-176 and added to NA-175.

Reasons:

1. The subject Patwar Circles have no homogeneity and compactness with landmass of NA 176 and as they are apparent on the land in proposed NA 175 and therefore they are merited to be included in NA 175. The language, race, cultural relationship they shares with the areas from proposed NA-175. Their excess, communication, transportation and other administrative facilities are all in proposed NA-175. The proposed NA-176 is already a huge landmass stretched over vast area. The local inhabitants and residents of these patwar circles shall be feeling inconvenience and relieved by their addition into NA-175.

2. Following PCs of QH Tarukari comprising of,

- a. Chak No.001/abbasia =12177
- b. Chak no.005/abbasia =14287
- c. Chak no.010/abbasia =8352
- d. Chak no.050/abbasia =10042

Total = 44858

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has been always a part of the main population of these (Abbasia-1 and Abbasia-2) and therefore merits to be added in NA-176. There is a connected petition titled "Waqas Ahmad Vs. The Delimitation Committee, ECP" which also being for the addition of PC of Qanongo Tarukari to be added in NA-176.

3. In case this Honourable Forum agrees to the representation the net change would be 44858 population will be added to NA-176 from NA-175 and 45958 is to be excluded from NA-176. The net population effect would be within the threshold.
4. It is further submitted that the representation titled "Khurshid Ahmad Khan Vs. Election Commission of Pakistan" with a specific prayer is:
 - a) Abbasia 1&2 population be excluded from NA-176 Rahim Yar Khan and be included NA-175 Rahim Yar Khan-I and the population of Qanongo Pakah Lara along with two PC ashraf shah and taranda be excluded in NA-175 from Rahim Yar Khan and be included in NA-176 Rahim Yar Khan, therefore

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Abbasia 1&2 where the local population is settlers and since this remain part and parcel. The landmass now comprising NA-176.

- b) The population geographical for the Abbasia 1&2 should remain within NA-176.
- c) Similarly, the Pakka Laran population presently in proposed NA-175 in case is disturbed and relocated to NA-176 in exchange of Abbasia 1&2 the grounds mentioned for the relocation of Abbasia 1&2 equally adversely affect the relocation of Pakka Laran to NA = 176
- d) Furthermore Pakka Laran people are already added in proposed NA-175 and their homogeneity to population, language, business and other public utilities, facilities with that all the people remain in proposed NA-175.
- e) Therefore, in exchange Abbasia 1&2 with Pakka Laran goes both ways and is not within the parameters of the Election Laws.

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f) Since longstanding historical perspective these area is always remain within administrative units in which they have been proposed rightly.

PROPOSAL

a. The Quota Per seat for the province of Punjab and existing population as per 2017 Census is given under:

- i. Quota per seat = 7,80,000 with 10% plus minus.
- ii. Existing Population of NA-175 = 8,34,642
- iii. Existing population of NA-176 = 7,65,764

b. PCs of QH Tarukari comprising of Chak No.001/abbasia, Chak no.005/abbasia, Chak no.010/abbasia and Chak no.050/abbasia

Therefore the proposed exclusion of patwar circles Mehmood kot, Mehmood shah, Nawa kot azafi, Nawa kot and Tahir Shaheed collectively having population of 45,958 presently are in NA-176 may be added in NA-175, and furthermore QH Tarukari PCs comprising of Chak