

THE SECRETARY, ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

MUHAMMAD SHAFQAT son of Ghulam Yaseen Khan, CNIC No. 31303-7957325-3, resident of Baloch House, Sonac, Tehsil & District Rahim Yar Khan. Col: 0300 960 3999.

.....Applicant/Objector

REPRESENTATION U/S 21 OF THE ELECTIONS ACT 2017 READ WITH RULE 11 OF THE ELECTION RULES 2017 AGAINST PRELIMINARY DELIMITATION OF TERITORIAL CONSTITUENCY OF NA-177 RAHIM YAR KHAN-III.

Respectfully Sheweth;

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- 1. That the applicant/objector is a voter member of the constituency of NA-177, Rahim Yar Khan-III. The relevant portion of voter list/certificate of vote from the concerned office is annexed herewith.
- 2. That the applicant/objector is aggrieved by the preliminary delimitation of territorial constituency of NA-177, Rahim Yar Khan-III (hereinafter to be referred as "impugned delimitation") and seeks its modification inter-alia on the following;

GROUNDS

i) That the impugned delimitation as published in preliminary report and preliminary list is against the letter and spirit of the law.



- That NA-177, Rahim Yar Khan-III has been delimited in such a ii) way that PCs of 1) Ihsan Pur, 2) Daulat Pur, 3) Abad Pur and 4) Thul Wazir have been included in the impugned delimitation. It is a river side area (Daryai) and has very limited road network and has historically been part of the neighboring constituency of NA-178, so it is to be excluded from the delimitation of the constituency and instead PCs of 1) Butta Kot, 2) Karamabad, 3) Tib Chohan, 4) Aslamabad, 5) Wahi Jumman Shah and 6) Kot Samaba Mohal along with the MC of Kot Samaba are to be included, which are "non-riverine belt" areas. By including these areas in the delimitation of NA-177 Rahim Yar Khan-III, road network and access will be better. Logistical issues may be avoided and there will be better electoral planning for conduct of free and fair election. After including and adding the above PCs and Kot Samaba MC and excluding PCs of 1) Ihsan Pur, 2) Daulat Pur, 3) Abad Pur and 4) Thul Wazir, the population will be meeting the requirement as a proportionate increase to previous constituency of NA-194 Rahim Yar Khan III.
 - Honourable Election Commission is also not adhered to in case of NA-179 Rahim Yar Khan (population 843,794) which is above the prescribed limits of maximum of 10% variance. This suggested proposal also brings the population of the entire district within the prescribed limits as well as spreads the urban, semi urban and rural divide more equitably; NA-179 Rahim Yar Khan-V is having 03 MCs including the district capital of Rahim Yar Khan MC, Tranda Sawai Khan MC and Kot Samaba MC. The entire Kot Samaba Mohal QH except for the PC of Kot Samaba Mohal (population: 1,824) is already with NA-177 Rahim Yar Khan III. The inclusion of this PC as well as the MC of Kot Samaba will help that principles of convenience and compactness are ensured.



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iv) That a suggested proposal is forwarded for the delimitation of NA-177, Rahim Yar Khan-III, keeping in view the requirements of law. The proposed delimitation of NA-177, Rahim Yar Khan-III is as follows:

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III ic ac f	ollows:		
III is as follows; a) Zahir Pir MC			48,554
•			•
b) The following QHs of Tehsil Khanpur:-			77. O49
i)	Chachran Sharif		75,948
ii)	Samokah		84,466
iii)	Jajja Abbasian		107,182
iv)	Garhi Ikhtiar Khan		102,368
c) Kot Samba MC of Tehsil Rahim Yar Khan;			31,984
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d) The following QHs of Tehsil Rahim Yar Khan			95,883
i)	Kot Samba Mohal		162,494
ii)	Rukan Pur QH		102/.>
e) The	following PCs of Pallu Sha	ah QH: of Tehsil	•
	im Yar Khan		
	i) Karamabad,	3,732	,
	ii) Rangpur	9,347	¥ *
	iii) Pallu Shah	20,052	*
	iv) Tib Chohan	10,175	ì
	v) Bhutta Kot	9,327	
	•	Sawai Khan OH	1

f) The following PCs of Tranda Sawai Khan QII Of Tehsil Rahim Yar Khan

i)	Aslamabad	5,998
ii)	Wahi Jumman Shah	10,961

TOTAL POPULATION

778,471

it is pertinent to note that the above proposed changes will re-proportion the population of 03 NA seats in a manner which is in the true spirit and letter the delimitation exercise carried out by the Honourable ECP and bring the population of each NA within the prescribed variance.

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PRAYER:

In view of the above submissions, it is, most humbly prayed that impugned preliminary delimitation of NA-177, Rahim Yar Khan-III be modified and proposed alteration may kindly be accepted and final delimitation be published as proposed in para No. () of grounds above in the representation.

Applicant/Objector

Through

S.u. zalid.

SANA ULLAH ZAHID

Advocate

Supreme Court of Pakistan.

SAJID MEHMOOD SHAD Advocate High Court

Al-Faiz Law Chambers,

Office No. 12, 2nd Floor, Aftab Plaza, Saidpur Road, Rawalpindi. e-mail: sajidadv@yahoo.co.uk Cell No. 0300-5302013, 0313-8337333