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**BEFORE THE HONOURABLE ELECTION COMMISSION OF PAKISTAN**

**In Re: Representation under Section 21(3) of the Election Act, 2017 read with Rule 12(1) of the Election Rules, 2017 in relation to the National Assembly Constituency NA-190 (D G Khan II)**

It is respectfully submitted as under:

1. This is a representation under Section 21(3) of the Elections Act, 2017 (“**Elections Act**”) read with Rule 12(1) of the Election Rules, 2017 (“**Election Rules**”) with reference to the draft proposal for delimitation by the Honorable Election Commission of Pakistan (“**Commission**”) of the National Assembly constituency NA-190 (D G K II) (the “**Constituency**”)(and other constituencies proposed within District Dera Ghazi Khan) as contained in the draft proposal of delimitation of the said constituency prepared and notified by the Commission pursuant to Section 17 and 20 of the Elections Act and Rule 7 and 10 of the Election Rules as its Preliminary Proposal for delimitation as provided for in Rule 11(2) of the Election Rules.
2. This representation is filed with the learned Secretary of the Commission in compliance with Rule 12(4) of the Election Rules by **Mr. Hafiz Muhammad Abdullah** son of Umar Khan Resident of Chah Taggah walay DakKhana Pakka Shahnawaz, Maqsooda Ghajhar Tehsil and District Dera Ghazi Khan (NA-190 D G Khan II) (the “**Petitioner**”) who is a voter of the Constituency.
3. The principal grounds on which this representation is moved and on the basis of which amendments, alterations and modifications in the preliminary proposals of delimitation by the Commission to the delimitation of the Constituency (and other constituencies proposed within District Dera Ghazi Khan) are as under:
  - (i) The delimitation of the Constituency is not compliant with the requirements of Section 20 of the Elections Act as, *inter alia*, the Constituency has not been properly, correctly and lawfully delimited by giving due weight and regard to the following statutory prescribed factors:
    - (a) distribution of population in geographically compact areas;

- (b) physical features;
  - (c) existing boundaries of administrative units;
  - (d) facilities of communication and public and voter convenience; and
  - (e) other cognate factors to ensure homogeneity in the creation of constituencies in District Dera Ghazi Khan.
- (ii) The Constituency has not been delimited in accordance with the principles set out in Rule 10(5) of the 2017 Rules *vis-à-vis* the requirements of starting from the Northern end of the District and then proceeding clock-wise in zigzag manner keeping in view of the population quota prescribed therein. According to the 2017 Census the total population of District Dera Ghazi Khan is **2872201** so the population “quota” under Rule 10(5) of the Election Rules is **718150** for each constituency.
4. In support of the objection it is submitted that the principles of Section 20(1) of the Elections Act and Rule 10(5) of the Election Rules have not been adhered to, *inter alia*, as:
- (a) From a bare perusal of the map of the Constituency (as proposed by the Commission in its preliminary report) is not delimited in a “compact” shape but rather has been given a very peculiar shape. An area comprising of essentially Teshil Taunsa (Makwal Kalan and Add Makwal Kalan) (the “Areas”) has been included in the Constituency for no apparent reason in the Map.
  - (b) The Areas of Teshail Taunsa has been included in the Constituency for no apparent reason. A bare perusal of the map reveals that the Constituency has been given an odd shape by arbitrarily including an area that forms a natural and geographical part of NA-189. This has resulted in a great variance in the width of the constituency at various different points.
  - (c) The Commission’s proposed delimitation of Constituency has not followed, the unusual length and shape of the constituency also does not take into account and give due weight and regard to facilities of communication and public and voter convenience.


5. **Consequential to the amendments, alterations and modifications sought by the Petitioner to NA-190 (D G K II):**

- (a) in effect from the proposed amendment, the Areas may be excluded from Provincial Assembly of the Constituency PP-287 (D G Khan III) and may be included in the PP-286 (D G Khan II) of the Constituency.

**PRAYER**

Wherefore the Petitioner respectfully prays that the instant representation be graciously accepted by the Commission and that the Commission graciously make the amendments, alterations and modifications sought to the draft proposal for delimitation of NA-190 (D G KAHN II) by the Petitioner (and make all applicable and consequential amendments, alterations and modifications sought to the draft proposal for delimitation of NA-190(D G KAHN II) NA-189 (D G KAHN I) and also all the amendments in the maps related to 4 National and 8 Provincial Assemblies constituencies of the District Dera Ghazi Khan.

Petitioner:   
Hafiz Muhammad Abdullah  
0314-7170285

Through:   
Muhammad Yaqoob Khan  
Advocate High Court

Islamabad, April 2, 2018