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**BEFORE THE ELECTION COMMISSION OF  
PAKISTAN, ISLAMABAD**

**SARDAR SHER ALI GORCHANI**  
Son of Sardar Pervaiz Iqbal Khan Gorchani  
Resident of Deputy Speaker House, 2 Upper Mall Lahore.

*mm*  
01-04-18

**REPRESENTATION**

**UNDER SECTION 21(3) ELECTIONS ACT 2017 READ WITH  
RULE 12 OF ELECTION RULES 2017 REGARDING  
ALTERATIONS OR MODIFICATIONS IN THE  
PRELIMINARY LIST OF CONSTITUENCY NA-193  
RAJANPUR-I AND NA-194 RAJANPUR-II**

Respectfully Sheweth,

1. That the petitioner is registered as voter of Union Council Tribal Area Tuman Gorchani, Tehsil Jampur District Rajanpur, **Annex-A** and Member of Provincial Assembly PP-294 formerly PP-248 and the same UC is part of current NA-194 formerly NA-174. As per notification No.F8(3)/2018-Elc-I dated 5<sup>th</sup> March, 2018, certain changes have been brought in the delimitation process effecting the boundaries of the same constituency in preliminary report of the list of constituencies of Provincial and National Assembly.
2. That the petitioner is aggrieved by the new delimitation and seeks proposed delimitation of NA-193 and NA-194 of District Rajanpur under following amongst the other.

**GROUNDS**

- i) That the new delimitation as published in preliminary report and preliminary list is against the provisions of section 20 of the Election Act, 2017 read with rule 10 and 12 of the Election Rules 2017.
- ii) That the Election Commission has delimited NA-193, which is inappropriate according to the

ground realities of demographic divisions of District Rajanpur as it is dissecting the Gorchani Tribes in two constituencies by keeping QH Dajal and QH Chacha in NA-193 while shifting QH Hajipur, Isran and Sham Khalchas into NA-194.

- iii) that the population required for the relevant population census could be retained by bringing minor changes in NA-194 & NA-195.
- iv) that as per new delimitation the notified NA-193 is as follows:

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**NA-193 Rajanpur-I**

- (a) MC Jampur,
- (b) The following QHs of Tehsil Jampur
  - i) Jampur
  - ii) Kot Janu
  - iii) Dajal
  - iv) Kotla Mughlan
  - v) Muhammad Pur QH of Tehsil Jampur excluding following PCs
    - i. Chak Kuraywala
    - ii. Bulewala: and
    - iii. Dura Rindan
- (c) Dajal TC (old) and
- (d) QH Chacha of De-excluded area Of Rajanpur District

**Total: 665242**

Copy of map NA-193 as delimited and notified by the ECP is attached as **Annex-B**

- v) That the delimitations of both constituencies have not been done as mentioned in rule 10(5) of the Election Rules 2017 according to which the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or, as the case may be, the agency and then proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota. Hence, the requirement of

law has been overlooked in the delimitation process done by the commission.

vi) It is settled law that a division should be done in the way that same should not affect the basic boundaries of the constituencies, whereas the same has been done against the procedure defined by law. The same can be attained by dividing the constituencies in rural and urban areas.

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vii) That as per new delimitation structure, the distribution of population should be geographically compact area facilitating communication and road approached with the object for public convenience, whereas the same has been overlooked in the process of delimitation. Hence, a suggested proposal is forwarded for the delimitation of NA-193 Rajanpur-I by making slight proposed changes in NA-194 and NA-195, keeping in view the requirements of the law.

The proposed NA-193 is as follows:

**NA-193 Rajanpur-I:**

- a) MC Jampur
- b) The following QHs of Tehsil Jampur
  1. QH Jampur
  2. QH Kot Janu
  3. QH Dajal
  4. QH Isran
  5. QH Hajipur
  6. QH Kotla Mughlan (excluding)
    - i. PC Rustam Leghari
    - ii. Dokar
    - iii. Qasimwala,
    - iv. Qamber Shah
    - v. Kotlan Mughlan
    - vi. Kotla Dewan
- c) TC Dajal
- d) QH Chucha of de-excluded area of Rajanpur District
- e) QH Sham Khulchas of de-excluded area of Rajanpur district

**Population 670966**

The proposed area of

**NA-194 Rajanpur-II**

- a) The following QHs of Tehsil Jampur
  - 1. QH Muhammad Pur
  - 2. Following PCs of QH Kotla Mughlan:
    - i. PC Rustam Leghari
    - ii. Dokar
    - iii. Qasimwala,
    - iv. Qamber Shah
    - v. Kotlan Mughlan
    - vi. Kotla Dewan
- b) MC Fazilpur
- c) MC Rajanpur
- d) The following QHs of Tehsil Rajanpur
  - 1. QH Fazilpur
  - 2. QH Fazilpur Colony
  - 3. QH Rajanpur
  - 4. QH Rajanpur Colony: excluding following PCs
    - i. PC Bursabad
    - ii. Rakh Dama
  - 5. QH Kotla Eisan: excluding the following PCs
    - i. PC Bait Sontra
    - ii. Nowshehra

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**Population 663534**

The Proposed area of

**NA-195 Rajanpur-III**

- a) The following QHs of Tehsil Rajanpur
  - 1. Kot Mithan
  - 2. Kotla Naseer
  - 3. Following PCs of QH Kotla Eisan
    - i. Nowshehra
    - ii. Bait Sontra
  - 4. Following PCs of QH Rajanpur Colony of Tehsil Rajanpur
    - i. Rakh Dama
    - ii. Brusasabad
- b) MC Kot Mithan
- c) Rojhan Tehsil
- d) Ozman QH of de-excluded area

**Population 661458**

Copy of the proposed map of NA-193 (highlighted in orange), NA-194 (highlighted in pink) and NA-195 (highlighted in yellow), is attached as **Annex-C**.

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In view of the above submissions, it is respectfully prayed that proposed alteration may kindly be accepted and PP-294 boundaries may kindly be adjusted as requested in para viii of the representation.

Any other relief which deems appropriate may also be granted to the petitioner in the interest of justice.



**SARDAR SHER ALI GORCHANI**  
Son of Sardar Pervaiz Iqbal Khan Gorchani  
Resident of Deputy Speaker House  
2 Upper Mall Lahore  
042-99201280, 99203655  
0300-2900000

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*01-04-18*