

BEFORE THE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD

Representation No. / 2018

Malik Naseem Ahmad Aheer Son of Muhammad Malik Khan
resident of M-4, Civil Lines, Jauharabad, Tehsil & District Khushab.

.....Petitioner

VERSUS

Delimitation Committee constituted under Rule 9, Election Rules, 2017.

.....Respondent

REPRESENTATION UNDER SECTION 21(2) OF
ELECTION ACT, 2017 READ WITH RULE 12 OF
ELECTION RULE, 2017 AGAINST PRELIMINARY
REPORT, SUBMITTED BY DELIMITATION
COMMITTEE, REGARDING (CONSTITUENCY NO.
NA-94, DISTRICT KHUSHAB-II), IN THE PROVINCE
OF PUNJAB

Humbly Sheweth:-

1. That the Petitioner was elected to the National Assembly of Pakistan in the General Elections of 1985. Later he became Federal Minister for Education and also held the port-folio of Minister of Interior, Government of Pakistan, for a considerable period.
2. That the Petitioner is a registered voter in (Constituency No.NA-94, Khoushab-II) and his name appears in the Electoral List, pertaining to the Electoral Area Civil Lines, G-Type, S-Type, Q-Type, U-Type, Circle No.1, District Khushab at Serial No.223. The extract of the Electoral List of the area is attached herewith as **Annexure-A**, for ready reference.

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3. That according to the preliminary report, submitted by Delimitation Committee, the proposed area, comprising of constituency No.NA-94, Khushab-II is comprised of following areas:-

- a) Municipal Committee Jauharabad;
- b) Municipal Committee Hadali;
- c) Municipal Committee Mitha Tiwana;
- d) The following QH of Khushab Tehsil:
 - i. Girot
 - ii. Mitha Tiwana;
 - iii. Jauharabad; and
 - iv. Noor Pur Thal Tehsilof District Khushab.

It may be pertinent to mention here, that the Petitioner name appears in this constituency and in the past he has been contesting from this constituency. This constituency is comprised of 622551 registered population according to the National Census of 2017.

4. That the Delimitation Committee of the Election Commission has erroneously disconnected Municipal Committee Khushab and unnatural connected it with NA-93, which is a totally an area of Awan population domination.

5. That the District of Khushab has natural, ethnic and population division, wherein the *Daman Mohar* (NA-93) is naturally a Awan dominated area and this geopolitical division bifurcating the two constituencies namely NA-93, (Khushab-I) and NA-94 (Khushab-II). These two constituencies mentioned above were identified and demarcated as NA-69 (Khushab-I) and NA-70 (Khushab-II) in the General Elections of 2013. For reference purpose the



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constituency NA-69 (present No. NA-93) was comprised of following areas:

- a) Soan
- b) Mohar
- c) Mitha Tiwana
- d) Quaidabad,

And the total population of the area mentioned above was 451584, whereas NA-70 (Present No. NA-94, Khushab-II) was comprised of following areas:

- a) Municipal Committee Khushab
- b) Municipal Committee Jauharabad
- c) Municipal Committee Hadali
- d) Noor Pur Thal Tehsil

It had a population of 454127. The difference of population between the two constituencies in year 2013 was only 3000.

6. That on the basis of fresh national consensus, which were held in 2017, the new constituencies were curved out fictitiously in order to give advantage to some notables of the area and to give a political jolt to the opponents, thus the said areas were given new number as NA-93 and NA-94.
7. That the District of Khoushab has its District Headquarter at Jauharabad, thus the cities of Khushab and Jauharabad are politically, geographically, socially, historically, administratively and ethnically, are one unit and connected. This natural unity has been disturbed with the application of gerrymandering, which is considered odd both politically and morally in the international as well as national levels.

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8. That on the basis of precise and fair calculation, the population of NA-93 is 658748, whereas the population of NA-94 is 622551, thus the difference of populations between two constituencies is only 36197.

9. That the Petitioner propose the reconstitution of NA-93 and NA-94 on the basis of socially, ethnically, politically, administratively, historically and geographical contiguity basis and last but not least on the basis of General Election of 2013.

10. That the Petitioner very respectfully propose that the Khushab City, which is now attached with NA-93, should be delinked from there and linked with NA-94 on the basis of reasons mentioned in previous paragraph and Municipal Committee Mitha Tiwana alongwith *Qanun Goi* of Mitha Tiwana, may be delinked from NA-94 and be part and parcel of NA-93, since the historic and natural alignment of the area and even on the basis of 2013 General Election, it has always been considered as one geographical and ethnical unit. Mathematically, presently the difference of population between NA-93 and NA-94 is $658785 - 622551 = 36234$, whereas according to the propose reconstitution and realignment of the constituency difference of population approximately remains the same. Khushab will be added to NA-94, having a population of 119400 approximately, whereas Municipal Committee Mitha Tiwana alongwith the Mitha Tiwana *Qanun Goi* has a population of approximately 83000 and that will be delinked from NA-94 and would be connected with NA-93, so the population difference, remains the same in the population which is a very important factor for curving out a constituency in the eye of law and practice.

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PRAYER:

In the above circumstances, it is most respectfully prayed that Honourable Election Commission of Pakistan may graciously bring the necessary alteration / changes, which has been propose by the Delimitation Committee in its preliminary report, to meet the ends of justice, fair play and equity for the citizen of Khushab City, who were emotionally disturbed with the proposals of Delimitation Committee.

Any other relief which this Honourable Election Commission may deem appropriate in the circumstances may also be given to the Petitioner, who has filed this representation in his representative capacity.

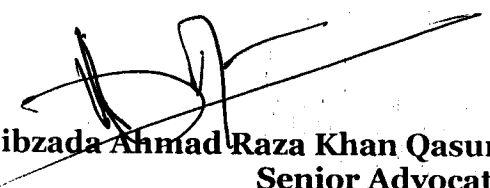
Petitioner

Malik Naseem Ahmad Aheer

Through:-

27th March, 2018

Counsel and authorize agent


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AFFIDAVIT

I, **Malik Naseem Ahmad Aheer** Son of Muhammad Malik Khan resident of M-4, Civil Lines, Jauharabad, Tehsil & District Khushab do solemnly affirm and declare as under:

1. That the Para 1 to Para 10 of the accompanying Election Representation, pertaining to the delimitation, may be read as an integral part of instant affidavit.
2. That nothing material has either been withheld or concealed from the body of instant affidavit.

DEPONENT

VERIFICATION:

Verified on 27th of March, 2018 at Islamabad on solemn affirmation that the contents of above mentioned affidavit are true and correct to the best of my information, knowledge and belief.

DEPONENT