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**BEFORE THE HON'BLE ELECTION COMMISSION OF  
PAKISTAN**

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SECRETARY  
ELECTION COMMISSION

27/03/2018

REPRESENTATION AGAINST DELIMITATION OF  
CONSTITUENCIES OF DISTRICT KHUSHAB PURSUANT TO  
SECTION 21 OF THE ELECTIONS ACT, 2017

*[Handwritten Signature]*  
31/03/2018  
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*It is most respectfully submitted: -*

1. That the Applicants No. 1 to 3 have filed the instant representation in representative capacity on behalf of all the residents of Chak No. 21 MB (Population: 520), Chak No. 22 MB (Population: 1961), Chak No. 23 MB (Population: 2618), Chak No. 24 MB (Population: 1648), Chak No. 25 MB (Population: 1161), Chak No. 26 MB (Population: 1923), Chak No. 27 MB (Population: 1494), Chak No. 28 MB (Population: 1119), Chak No. 30 MB (Population: 1324), Chak No. 31 MB (Population: 1492), Chak No. 32 MB (Population: 959) in district Khushab (hereinafter collectively referred to as "the Chaks"). Furthermore, Applicants No. 4 & 5 are representing residents of "Bijar Janubi (Population: 959)

10,105)", "Sheikhu (Population: 1698)" and "Bijar Shumali (Population: 113").

2. That according to preliminary delimitation of constituencies of district Khushab the "Chaks" have been included in PP 84 Khushab-III and NA 93. On the other hand "Bijar Janubi", "Sheikhu" and "Bijar Shumali" have been included into PP 82 Khushab- I and NA 94.

3. That the inclusion of "Chaks" into PP-84 Khushab-III/NA 93 and inclusion of villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" into PP 82 Khushab-I/NA 94 blatantly violates the principles of delimitation of Constituencies enumerated in section 20 of the Elections Act, 2017, Election Rules, 2017 and guidelines of this Hon'ble Commission.

4. The Applicants No. 1 to 3 request exclusion of the "Chaks" from PP 84 Khushab-III/NA 93 and their inclusion into PP 82 Khushab-I/ NA 94. Whereas Applicants No. 4 & 5 request exclusion of villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" from PP 82 Khushab-I/NA 94 and their inclusion into PP 84 Khushab-III/NA 93 on following grounds:

#### GROUNDS

A. That in accordance with section 20 of the Elections Act, 2017 all constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical

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features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.

B. That a plain and simple look at the map of district Khushab appended with the instant representation makes it crystal clear that the "Chaks" are **geographically contiguous** to PP 82 Khushab- I and NA 94. In fact, the "Chaks" are completely surrounded by **PP 82 Khushab-I and NA 94** from all directions.

C. That the western boundary of the "Chaks" is contiguous to **PP 82 Khushab- I and NA 94 stretching to approximately 25 km**. To the East again an approximate boundary of 25 Km is shared with **PP 82 Khushab-I and NA 94**. Whereas, southern boundary with **PP 82 Khushab-I and NA 94 is approximately 10 Km long**. To the North a boundary of approximately 10 Km is shared with **PP 84 Khushab-III and NA 93**. Therefore, in order to **preserve geographical compactness**, it is necessary that the "Chaks" are included into **PP 82 Khushab- I and NA 94**.

D. As apparent from a brief examination of the attached map of district Khushab constituencies, the distance between "Chaks" and MC Mitha Tiwana in **PP 82 Khushab-I and NA 94** is approximately 15 Km on a metalled road. Similarly, towards west distance between "Chaks & Rakh Peelovains" from **Union headquarter Adhikot in PP 82**

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Khushab-I and NA 94 is also approximately 15 km on a metalled road. However, there is no straight metalled road connecting Tehsil headquarter Quaidabad in PP 84 Khushab-III/ NA 93 and the "Chaks". It is noteworthy that to reach tehsil headquarter Quaidabad in PP 84 Khushab III/NA 93, the residents of the "Chaks" have to first travel to MC Mith Tiwana or Union Council AdhiKot in PP 82 Khushab-I/NA 94 covering a distance of almost 50 km in both directions.

E. Therefore, all essential facilities of life including hospitals, schools and colleges located within PP 82 Khushab -I/NA 94 are easily accessible to residents of the "Chaks". Hence, in view of overwhelming public convenience and facilities of communication, it is imperative that the "Chaks" are included into PP 82 Khushab-I/NA 94.

F. Furthermore, a plain and simple reading of the map of district Khushab appended with the instant representation makes it abundantly clear that villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" are situated very close at a distance of approximately 10 km from Tehsil headquarter Quaidabad of PP 84 Khushab-III/NA 93. On the other hand distance between villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" and Tehsil headquarter Noorpur Thal of PP 82 Khushab-I/NA 94 is approximately 60 km.

G. Furthermore, It can be seen from the map that villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" are

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situated near along main Sargodha-Mianwali highway going towards tehsil headquarter Quaidabad of **PP 84 Khushab-III/NA 93**. However, there is no direct metalled road from aforesaid three villages leading to tehsil headquarter Noorpur thal of **PP 82 Khushab-I/NA 94**.

H. Therefore, all fundamental facilities of life including hospitals, schools and colleges are located within **PP 84 Khushab -III/NA 93** at a very short distance of 10 km approximately in tehsil headquarter Quaidabad. Hence, in view of overwhelming public convenience and facilities of communication, it is imperative that the three villages are included back into **PP 84 Khushab-III/NA 93**.

I. That as far as physical features of villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" are concerned, they are characterized by rich fertile land similar to most areas of **PP 84 Khushab-III** as opposed to **PP 82 Khushab-I/NA 94**, which is characterized by desert Thal. Thus, there is a huge disparity between civilization, culture and traditions of the aforesaid three subject Villages and **PP 82 Khushab-I/NA 94**. Moreover, the residents of villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" have strong social ties/bonds with tehsil quaidabad in **PP 84 Khushab III/NA 93**.

J. That after inclusion of "Chaks" into **PP 82 Khushab- I/NA**

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94 and after exclusion of villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" from PP 82 Khushab I/NA 94, the total constituency population of PP 82 Khushab I/NA 94 shall become 431,872/- and 627,586/-. On the other hand after exclusion of "Chaks" from PP 84 Khushab-III/NA 93 and after inclusion of villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" into PP 84 Khushab-III/NA 93, the total constituency population of PP 84 Khushab-III and NA 93 would become 421,578/- and 653,713/-. Therefore the variation in population of all constituencies involved shall remain less than 10 %.

PRAYER

In view of the above, it is most respectfully prayed that upon acceptance of this representation, this Hon'ble Commission may:-

- a. Alter and modify Constituencies PP 84 Khushab-III/NA 93 and PP 82 Khushab-I/NA 94 of district Khushab by excluding all the "chaks" mentioned in Para 1 above from PP 84 Khushab-III/ NA 93 and incorporating them into PP 82 Khushab-I/NA 94. Similarly, villages "Bijar Janubi", "Sheikhu" and "Bijar Shumali" may graciously

be included back into PP 84 Khushab III/NA 93 by  
excluding them from PP 82 Khushab I/NA 94 through  
issuance of final list of the Constituencies in the interest of  
justice and public interest.

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31/03/2018

Dated: 27.03.2018

Applicants:

0301-6778480

1. Muhammad Yasin s/o Nisar Ahmed r/o Chak No. 22 MB, tehsil quaidabad & district Khushab.

0301-7748728

2. Abdulwaheed s/o Ghulam Abdur Raheem r/o Chak No. 26 MB, tehsil quaidabad & district Khushab.

0300-8604477

3. Chd. Nazar Hussain s/o Sadiq Hussain r/o Chak No. 27 MB, Dakkhana chak No. 26 MB, tehsil quaidabad & district khushab.

0300-6139353

4. Raziullah Khan s/o Muhammad Latif R/o Muhalla Kaleranwalla, sheikhu, Dalkhanga okhi Mohla, tehsil & district Khushab

0313-6238481

5. Sara ullah s/o Muhammad Anwar R/o Dalkhanga Bijar Janubi, tehsil & district Khushab Saraullah

Through:

MUHAMMAD MOAZZAM SHER KALLU  
Bar-at-Law

Advocate High Court  
First Floor E- Plomer Building,  
26 The mall, Lahore