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BEFORE THE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD

Handwritten signature and date: 21/03/2018

Representation No. _____/2018

Malik Abdul Majeed S/o Allah Bakhsh, R/o Sialanwala, Kirari Kot No. 1, P/o Khas,
Tehsil & District Bhakkar. (Cell # 0333-6848115)

Applicant

VERSUS

Election Commission of Pakistan through its secretary, Shakra-e-Dastoor,
Islamabad.

Respondent

**REPRESENTATION/OBJECTION PETITION U/S 21(3) OF ELECTION ACT,
2017 READ WITH RULE 12, OF ELECTION RULES, 2017 WITH ALL
ENABLING PROVISIONS OF LAW REGARDING THE DELIMITATION OF
CONSTITUENCIES.**

Respectfully Sheweth:-

1. That applicant is a voter member of National Assembly constituency NA
98 Bhakkar-II having Silsla No. 108, Gharana No. 35, Tehsil & District
Bhakkar. Copy of registration along with CNIC is attached as **Annexure A**
to A/1.

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2. That in pursuance of delimitation the respondent has notified the list of constituency of National and Provincial Assemblies of all over the country. Copy of the draft list of constituencies of District Bhakkar along with MAP are attached here with as Annexure B to B/1.
3. That applicant is directly and substantially being aggrieved from delimitation of constituency NA 98 Bhakkar-II as the said notified constituency is not in accordance with the requirement and rules and other prevailing laws.
4. That applicant seeks amendments and impugned the said delimitation inter alia on the following amongst other:-

GROUND S

- a. That delimitation of constituency regarding District Bhakkar and National Assembly namely NA 98 Bhakkar-II is in violation of statutory principles for the purpose of delimitation as stipulated in the act.
- b. That for the purpose of delimitation process certain rules are provided through the act *ibid*. Principle rule thereof can be categorized as under:-
 - i. Uniform Distribution.
 - ii. Geographical Compactness and Territorial unity.
 - iii. Existing boundaries of Administrative Limits.
 - iv. Facility of Communication.
 - v. Public Convenience.
- c. That notified constituency is not delimited according to the principles and rules as categorized earlier which is clear violation of law and rules as provided in the act.
- d. That it may please be appreciated that a fair comparison of notified and proposed constituency in District Bhakkar lead to an apparent conclusion that purpose of delimitation is to facilitate the public at large and to avoid from public inconvenience but present delimited

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constituency is in consonance with the rules, principles and laws of delimitation.

- e. That entire idea behind the delimitation of National and provincial Assembly are to provide easy and convenient accessibility to voter to approach their representatives, but this concept was totally negated keeping in view the notified constituency. It can also be seen that the notified constituency has not been delimited into geographical compactness area and is highly inconvenient to the people who have to travel long distance to take access their elected members for solving their problems.
- f. That according to impugned notification the prescribed population of constituency NA 97 Bhakkar-I is 819783 where as population of NA 98 Bhakkar-II is 830735.
- g. That it is worth pertinent to mention here that some of the Patwar Circles i.e P.C Khansra having the population 7651, PC 191/TDA with 1636, PC 193/TDA with 1897 and PC 195/TDA with 3514 total population 14698 having no compact block and has no easy access for the people of this area and before the issuance of impugned notification above mentioned PCs were the part of of NA 97 Bhakkar-I from the very first day, thus, these should be excluded from NA 98 Bhakkar-II and be included in NA 97 Bhakkar-I which is adjacent to these patwar circles.
- h. That in consequence of entire exercise population of NA 97 Bhakkar-I would be 834481 and population of NA 98 Bhakkar-II would be 816037 which is in accordance with rules and laws on the basis of geographical compactness and of uniform distribution of population in the said constituency. For assistance and ready reference copy of the MAP is attached here with as Annexure C. Hence this representation.

JA/31/03/2018

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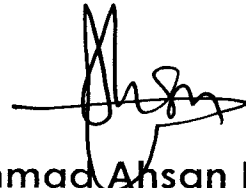
In view of the submissions made above and keeping in view the eventualities, factual and actual facts, it is most respectfully prayed that instant representation/objection petition may very graciously be accepted and the notified constituency be cancelled/rectified and be constituted in accordance with the constituency proposed through this representation. The reconstituted constituencies may kindly be notified as the final list of the constituencies under the governed rules and policies.

Any other relief which this Hon'ble Commission deems fit may also be granted.

عبدالجبار

Applicant/Objection Petitioner

Through



Mohammad Ahsan Bhoon

Advocate Supreme Court of Pakistan



Asif Iqbal Khan Shahani

Advocate High Court


14- Aiwane-e-Shah Chiragh, The Mall, Lahore.

Cell: **0334-8337060**



Declared on Oath before me
By.....
No.....
Identif.....

VERIFICATION


MOHAMMAD NAJIB
OATH COMMISSIONER
LAHORE
9/1/18

Verified on oath at Lahore this 28th day of March 2018 that all the contents PARA No. 1 to 4 and ground a to h of representation/objection petition are true and correct to the best of my knowledge and belief.

عبدالجبار
Applicant

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A/21/03/2018

BEFORE THE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD

Representation No _____/2018

In Re:-

Malik Abdul Majeed VS ECP

AFFIDAVIT OF :- Malik Abdul Majeed S/o Allah Bakhsh, R/o Sialanwala, Kirari Kot
No. 1, P/o Khas, Tehsil & District Bhakkar.

I, the above named deponent, do hereby solemnly affirm and declare
as under:-

1. That applicant is a voter member of National Assembly constituency NA 98 Bhakkar-II having Silsla No. 108, Gharana No. 35, Tehsil & District Bhakkar. Copy of registration along with CNIC is attached as **Annexure A to A/1.**
2. That in pursuance of delimitation the respondent has notified the list of constituency of National and Provincial Assemblies of all over the country. Copy of the draft list of constituencies of District Bhakkar along with MAP are attached here with as **Annexure B to B/1.**
3. That applicant is directly and substantially being aggrieved from delimitation of constituency NA 98 Bhakkar-II as the said notified constituency is not in accordance with the requirement and rules and other prevailing laws.
4. That applicant seeks amendments and impugned the said delimitation inter alia on the following amongst other:-

GROUND S

- a) That delimitation of constituency regarding District Bhakkar and National Assembly namely NA 98 Bhakkar-II is in violation of statutory principles for the purpose of delimitation as stipulated in the act.
- b) That for the purpose of delimitation process certain rules are provided through the act ibid. Principle rule thereof can be categorized, as under:-
 - i. Uniform Distribution.
 - ii. Geographical Compactness and Territorial unity.
 - iii. Existing boundaries of Administrative Limits.
 - iv. Facility of Communication.
 - v. Public Convenience.
- c. That notified constituency is not delimited according to the principles and rules as categorized earlier which is clear violation of law and rules as provided in the act.

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- D. That it may please be appreciated that a fair comparison of notified and proposed constituency in District Bhakkar lead to an apparent conclusion that purpose of delimitation is to facilitate the public at large and to avoid from public inconvenience but present delimited constituency is in consonance with the rules, principles and laws of delimitation.
- e. That entire idea behind the delimitation of National and provincial Assembly are to provide easy and convenient accessibility to voter to approach their representatives, but this concept was totally negated keeping in view the notified constituency. It can also be seen that the notified constituency has not been delimited into geographical compactness area and is highly inconvenient to the people who have to travel long distance to take access their elected members for solving their problems.
- f. That according to impugned notification the prescribed population of constituency NA 97 Bhakkar-I is 819783 where as population of NA 98 Bhakkar-II is 830735.
- g. That it is worth pertinent to mention here that some of the Patwar Circles i.e P.C Khansra having the population 7651, PC 191/TDA with 1636, PC 193/TDA with 1897 and PC 195/TDA with 3514 total population 14698 having no compact block and has no easy access for the people of this area and before the issuance of impugned notification above mentioned PCs were the part of of NA 97 Bhakkar-I from the very first day, thus, these should be excluded from NA 98 Bhakkar-II and be included in NA 97 Bhakkar-I which is adjacent to these patwar circles.
- h. That in consequence of entire exercise population of NA 97 Bhakkar-I would be 834481 and population of NA 98 Bhakkar-II would be 816037 which is in accordance with rules and laws on the basis of geographical compactness and of uniform distribution of population in the said constituency. For assistance and ready reference copy of the MAP is attached here with as Annexure C. Hence this representation.



عبدالحجیر
Deponent

VERIFICATION

Verified on oath at Lahore this 28th day of March, 2018 that contents para 1 to 4 and ground a to h of affidavit are true and correct to the best of my knowledge and belief.

Declared on Oath before me

By.....

Sworn.....

Identified by.....

Handwritten signature of Oath Commissioner
MOHAMMAD NAJIB
OATH COMMISSIONER
LAHORE

عبدالحجیر
Deponent