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

Representation/Appeal No. \_\_\_\_\_ 2018

**Aman Ullah** son of Nazir Ahmad, resident of Chak  
No.187/7R Post office Khichi Wala Tehsil Fort Abbas  
District Bahawalnagar.

**Appellant**

**VERSUS**

**Delimitation Committee** Punjab, PP-243  
Bahawalnagar District.

**Respondent**

**REPRESENTATION/APEAL UNDER SECTION 21**  
**RULE 12 READ WITH ALL ENABLING PROVISIONS**  
**OF THE ELECTION ACT, 2017 AGAINST THE**  
**DELIMITATION BY THE RESPONDENT**

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Respectfully Sheweth:-

1. That correct addresses of the parties are incorporated in the caption of the instant appeal for service of process and issuance of any notice / summons by this Hon'ble Authority.
2. That the brief facts leading to filing of instant appeal are that the appellant is a registered voter of PP-243 Bahawal Nagar in Electoral Area

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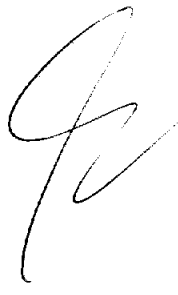
/ Census Block No. 247010701. Respondent has illegally and unlawfully excluded the Petitioner's two Circle numbers namely Chak No.187/7R PC and Chak No.190/7R PC of QH Khichi Wala from PP-244 and said area illegally unlawfully included into PP-243 Bahawalnagar District against the instructions issued for delimitation of constituencies of Provincial Assembly and National Assembly under The Election Act, 2017 and the rules made there-under. (Copies of voter certificate (**Annex-A**), Map issued by the ECP (**Annex-B**), Marked Highlighted Map issued by ECP, Proposed Marked Highlighted Map (**Annex-C & C1**) Population Description Chart Original and proposed of Constituencies PP-244 Bahawalnagar District & PP-243 Bahawalnagar District (**Annex-D & D1**), are attached herewith).

3. That the appellant prepared a proposed map and detail of equal distribution of population most appropriate then the respondent, compactness and public convenience of the adjacent constituencies' i.e. PP-244 Bahawalnagar District & PP-243 Bahawalnagar District as per law and rules. Copies of purposed Map and detail of population adjustment are attached as above.
4. That the impugned delimitation dated 05-02-2018 is illegal, unlawful and the same is liable to be set aside, inter alia, on the following:-

#### GROUNDS

- a) That the impugned delimitation is against the recognized principles of delimitation, including but not limited to the principles of equal distribution of population, geographical compactness, existing boundaries of administrative units, facility of communication and public convenience, and it is therefore, liable to be declared illegal, unlawful and against the law and rules applicable thereto.
- b) That the respondent has illegally, unlawfully excluded the Petitioner's two Circle numbers, Chak No.187/7R PC and Chak No.190/7R PC of QH Khichi Wala from the PP-244 Bahawalnagar District against the instructions issued for delimitation of constituencies of Provincial Assembly and National Assembly under The Election Act, 2017 and the rules made there-under and has thereby caused permanent inconvenience and confusion for the residents of the PP-244 Bahawalnagar District.
- c) That above said proposed two Circle numbers, Chak No.187/7R PC and Chak No.190/7R PC of QH Khichi Wala are connected with PP-244 Bahawalnagar District from three sides and according to

the 'Extent of Constituency' published by the respondent, it is not connected with the PP-243 Bahawalnagar District Therefore, it is more appropriate if the said Area is made part of PP-244 Bahawalnagar District in order to achieve the ends of geographical compactness and public convenience.



- d) That the impugned delimitation is a result of mala fide and political interference which has overlooked the principles of geographical compactness and public convenience, it is worth mentioning here the old map is also ignored and not considered at the time of delimitation.
- e) That the respondent illegally took the North from wrong side however the old map shows otherwise. That under the law, rules and instructions the respondent has no power to delimit the constituencies anti Clock wise.
- f) That the respondent was duly bound to comply with the instructions for the delimitation of constituencies of Provincial Assemblies and National Assemblies and the same were not followed by him.
- g) That provisions / instructions for delimitation of constituencies of Provincial Assemblies and National Assemblies under The Election Act, 2017 and Rules made

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there-under have been flagrantly violated by the respondent.

- h) That the faulty, illegal and unlawful delimitation conducted by the respondent has disturbed the uniformity and compactness of the Provincial Assemblies and National Assemblies.
- i) That the respondent has illegally split more than 10% of Electoral Area / Census Blocks.
- j) That the respondent has no authority to detach the said proposed electoral area from the PP-244 Bahawalnagar, therefore, he has assumed the jurisdiction not vested in him.

**PRAYER:**

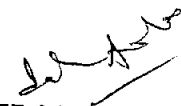
In view of the above submissions, it is most respectfully prayed that instant appeal / representation / objection petition may kindly be accepted and impugned delimitation may kindly be set-aside.

It is further prayed that two Circle numbers, Chak No.187/7R PC and Chak No.190/7R PC of QH Khichi Wala be excluded from PP-243 Bahawalnagar District and be included to the appropriate PP-244 Bahawalnagar District in the supreme interest of justice, equity and fair play.

Any other relief which this Hon'ble Commission deems fit and appropriate under the circumstances may also be awarded to appellant.

  
Appellant 

Through

  
**HAFIZ MUHAMMAD SALEEM**  
Advocate High Court  
7-Turner Road, Lahore  
0321-4432234

Dated: \_\_\_\_\_