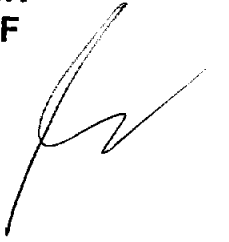


BEFORE THE ELECTION COMMISSION OF PAKISTAN
THROUGH SECRETARY ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD.



REPRESENTATION UNDER RULE 12 OF CONDUCT OF
ELECTION RULES 2017, AGAINST
THE PUBLICATION OF PRELIMINARY
PROPOSAL REGARDING PROVINCIAL
ASSEMBLY CONSTITUENCIES OF
DISTRICT BAHAWALNAGAR PP-243 &
244, ON BEHALF OF

(1) NAZEER AHMAD SON OF MUHAMMAD DIN
RESIDENT/ VOTER OF CHAK NO.190/7-R,
KHICHIWALA, TEHSIL FORTABBAS,
DISTRICT BAHAWALNAGAR.

(2) ZAFAR IQBAL SON OF SHER JANG,
RESIDENT/ VOTER OF CHAK NO.187/7-R,
TEHSIL FORTABBAS, DISTRICT
BAHAWALNAGAR.

Respectfully sheweth;

1. Brief facts of the matter are that the
petitioner No.1 is voter enrolled in
electoral role for Chak No.190/7-R
Khichiwala, Tehsil Fortabbas, District

Bahawalnagar and similarly petitioner No.2 is enrolled as voter in Chak No.187/7-R, Tehsil Fortabbas, District Bahawalnagar. Petitioners are eligible to file the instant representation to raise the objection against inclusion of their patwar circles i.e. 175/7-R having population of 5899, PC 187/7-R having population 14410 and PC 190/7-R having population of 5758 total population of theses PCs is 26067 in PP-243 Haroonabad which were previously part of PP-284 the new number of which is PP-244. Petitioners are also objecting the inclusion of PC 185/7-R having population 12213 with PP-244 as the same was previously with PP-243 (PP-283).

2. That while making the delimitation the area of proposed PP-243 Tehsil Haroonabad, District Bahawalnagar is not correctly delimited whereby geographical compactness

and other physical features were also ignored beside being overlooking the existing boundaries of these constituencies, hence petitioners in order to get the same corrected make the following objections/proposals, to maintain geographical compactness of the area and to sustain the existing boundaries of the proposed delimitation:-

GROUND OF OBJECTIONS

- a. That the patwar circles 175/7-R having population of 5899, PC 187/7-R having population 14410 and PC 190/7-R having population of 5758 were part of PP-284 (PP-244). Now the same are included with PP-243. Total population of these PCs is 26067 whereas the total population of proposed PP-243 Bahawalnagar-VII is 398666 and population of PP-244 Bahawalnagar-VIII is 369986, meaning

thereby there is a huge variation of population between the two PP constituencies of Bahawalnagar District.

- b. That Patwar Circle 185/7-R which was previously part of PP-283 (PP-243) and now included with PP-244 which has the total population of 12213 and due to this unreasonable exclusion from PP-283 (PP-243) there is big variation in population occurred which is against the principle of reasonableness.
- c. That PC 175/7-R, PC 187/7-R and PC 190/7-R are situated at a distance of 20-KM from Fortabbas Tehsil Headquarter whereas if these are allowed to remain with PP-243 which is basically seat of Haroonabad Tehsil, the distance of Haroonabad Tehsil Headquarter from these PCs is more than 40-KM. That is why previous inclusion of these three PCs with the PP-244 of Fortabbas Tehsil was made in order to maintain the facility of less communication to people of the area of these three PCs. If the impugned

proposed delimitation is allowed to sustain the people of these three PCs has to suffer agony of long distance beside being breaking of geographical compactness of the area and further the administrative boundaries will also be flouted. Therefore, as per Section 20 of Election Act 2017 this notification regarding these two PP constituencies is required to be reversed and modified and in order to maintain the variation of population between these two PP seats the restoration of previous delimitation by adjusting these PCs is inevitable in the larger interest of the people of these PCs and will ensure homogeneity and restoration of geographical compactness.

- d. That the PC 185/7-R which was previously part of PP-283 (new PP-243) is now included with PP-244 contrary to its previous history, similarly the PC 175/7-R, 187/7-R and 190/7-R are included with PP-243 which was also made in violation of the principle of existing boundaries and if this error is corrected the PCs 175/7-R, 187/7-R and 190/7-R are excluded

from PP-243 and included with PP-244 and PC 185/7-R is excluded from PP-244 and included with PP-243, then the population of PP-243 will be 384812 and population of PP-244 will be 383840 which will be very competitive.

- e. That if the proposed delimitation is allowed to sustain there will be a big variation of more than 29,000/- in population of each of the constituency which would caused communication difficulties for the people of the area which is against the public interest.
- f. That the purpose of delimitation as per Section 20 of the Act is that future delimitation would create competitiveness and facilitation for the people to avail the administrative opportunities beside being geographical compactness and maintaining the boundaries of the provincial assembly constituencies.

In view of the above submissions, it is, therefore, most respectfully prayed that the PCs 175/7-R, 187/7-R and 190/7-R may kindly be excluded from PP-243 Bahawalnagar-VII and

same may kindly be included with PP-244 Bahawalnagar-VIII and PC 185/7-R may kindly be excluded from PP-244 Bahawalnagar-VIII and the same may kindly be included in PP-243 Bahawalnagar-VII.

PETITIONER

- (1) NAZEER AHMAD SON OF MUHAMMAD DIN
RESIDENT/ VOTER OF CHAK NO.190/7-R,
KHICHIWALA, TEHSIL FORTABBAS,
DISTRICT BAHAWALNAGAR.
- (2) ZAFAR IQBAL SON OF SHER JANG,
RESIDENT/ VOTER OF CHAK NO.187/7-R,
TEHSIL FORTABBAS, DISTRICT
BAHAWALNAGAR.

through

M.A. GHAFAR-UL-HAQ
Advocate Supreme Court
C.C. No.PLH-14539

A. H. LAW ASSOCIATES
Suite No.07, Ground Floor, SAF Center
8-Fane Road, Lahore.

Dated: 02.04.2018