

hv (2) 49

**BEFORE THE HONORABLE SECRETARY, ELECTION**  
**COMMISSION OF PAKISTAN, ISLAMABAD**

Subject:-

**REPRESENTATION UNDER SUB SECTION 3**  
**OF SECTION 21 OF THE ELECTION ACT,**  
**2017 READ WITH SUB RULE 4 OF RULE 12**  
**OF THE ELECTION RULES, 2017 AGAINST**  
**THE PRELIMINARY DELIMITATION OF THE**  
**PUNJAB PROVINCIAL ASSEMBLY**  
**CONSTITUENCIES NO. PP-255, PP-256,**  
**PP-257, PP-258, PP-259, PP-260, PP-261,**  
**PP-262, PP-263, PP-264, PP-265, PP-266**  
**AND PP-267 OF DISTRICT RAHIM YAR**  
**KHAN**

Respectfully Sheweth:-

1. That the petitioner / applicant Abdul Qadir S/O Alam Din CNIC No. 31303-2384019-9 is registered voter having vote No. 01 (Block Code-252120307) in PP- 261 District Rahim Yar Khan and intends to submit the instant representation against the preliminary delimitation of Provincial Assembly constituencies of District Rahim Yar Khan.
2. That 13 seats of the Provincial Assembly were existing within the boundaries of District Rahim Yar Khan and the number of constituencies has not changed. Even though there was no change in the number of constituencies yet very drastic redrawing of the borders of the provincial assembly seats has been carried out, specifically, the preliminary delimitation so published specially for PP-261 has been prepared in violation of the principles envisaged in Section 20 of the Election Act, 2017 read with Rule, 10 (3) of the Election Rules, 2017, therefore, the undersigned is aggrieved by the draft / preliminary delimitation of PP-261 on the following

**GROUND**

- a. That the draft delimitation proposal as published in the preliminary report and preliminary list is against the provisions of Section 20 of the Election Act, 2017 read with Rule, 10 (3) &

- b. That the law promulgated for the delimitation of the constituencies, requires to observe for the delimitation of each constituency, the following principles:-
  - i. The constituency should be contiguous and equal in population.
  - ii. The constituency should be compact therefore, odd shape formation and gerrymandered constituencies be avoided so as to ensure geographical compactness.
  - iii. The territorial unity shall be observed and specially the Patwar Circle shall be the basic unity for delimitation and it shall not be broken in any circumstances.
  - iv. Public convenience, facility of communication in the light of physical features of the area so delimited and other cognate factors to ensure homogeneity in creation of constituencies be observed / kept in view.
  - v. Variation of population of constituencies of an assembly shall not ordinarily exceed 10%.

But the above principles have not been observed while formulating preliminary draft delimitation proposal of PP-261, therefore, the situation warrants that the draft preliminary proposal be amended by accepting the proposal of the applicant to delimit the constituencies purely on merit and strictly in compliance with the principles of delimitation of constituencies enshrined in the Election Act, 2017.

- c. That the total population of District Rahim Yar Khan is 48,14,006/- souls whereas, average @ 13 Punjab Province Constituencies in District Rahim Yar Khan comes to 3,70,308/- souls, however, 10% variation is permissible, whereas, in the draft preliminary delimitation proposals of Provincial Constituencies of District Rahim Yar Khan the above principle of population has been violated to same extent. Therefore, the draft preliminary delimitation is liable to be amended.
- d. That it was mandatory for the authorities / Election Commission of Pakistan to adopted proper procedure for delimitation of constituencies as detailed in Section 20 of the Election Act, 2017 read with Rules, 10 of the Election Rules, 2017.
- e. That PP-261 Rahim Yar Khan-VII has been delimited in such a way that one Provincial Constituency has been spread over and made part of four National Assemblies Constituencies.

leading to confusion and causing logistical issues and difficulties for electoral planning and conduct of free and fair election. This may be the only Provincial Constituency throughout the Punjab Province having such territorial structure as no other Provincial Constituency is spread over the four National Assembly Constituencies. The breakup / division of the area of PP-261 showing its division in each of four National Assembly Constituencies is given here under:-

- i. Qanoon go Halq Bagh-o-Bahar of Tehsil Khan Pur attached with PP-261 is part of National Assembly Constituency 176 Rahim Yar Khan.
- ii. Qanoon go halqa Kot Samaba Mohaal attached with PP-261 is part of National Assembly Constituency 177 Rahim Yar Khan.
- iii. Qanoon go halqa of Taj Garh and Patwar Circle Wahi Jumman Shah attached with PP-261 is part of National Assembly Constituency 178 Rahim Yar Khan.
- iv. Municipal Committee Kot Samaba, Qanoon go Halqa of Tranda Sawaye Khan, Patwar Circle Aslam Abad, Patwar Circle Baheshti, Patwar Circle Chenah, and Patwar Circle Kotla Ayyub Khan attached with PP-261 is part of National Assembly Constituency 179 Rahim Yar Khan.

Bare perusal of the above detail establishes the fact that the area / Qanoon go halqas/ Patwar Circles of the draft preliminary delimitation of PP-261 have been divided / spread in the area of / Constituencies of four National Assembly Seats of Rahim Yar Khan District viz NA-176, NA-177, NA-178 & NA-179. This situation will obviously affect the electors of PP-261 because none of the elected persons from the four National Assemblies seats will take sole responsibility of PP-261, rather they will pass on this responsibility to each other's shoulders. Therefore, the requirement of the situation is that amendment in PP-261 be made to remove the above deficiency.

- f. That draft preliminary delimitation proposal of PP-261 prepared by the Commission is lacking the important factor of geographical compactness. The Patwar Circles of Chak No. 31/P, Jhool, Mud Ilyas, Mari Allah Bachaya, Mondi Laar, and Sher Garh are adjacent to Municipal Committee / Urban portion of Khan Pur City, whereas, Patwar Circles Akram Abad. Thal Wari and

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Municipal Committee Rahim Yar Khan, as such, the area of draft delimitation of PP-261 starting from the Municipal Limits of Khan Pur Municipal Committee from one end is spread and goes on upto Tibbi Laraan adjacent to Municipal Committee Rahim Yar Khan to the other end, which is about 70 to 75 km long area thus is not only against the principal of public convenience but also seems to be unprecedented / unique in the Punjab Province, therefore, the constituency of PP-261 requires reshaping to establish contiguity and compactness required under the provisions of law.

- g. That in view of the above grounds, suggestion is submitted to avoid gerrymandering, the under mentioned proposal is submitted which meets the requirement of law and based on principles of delimitation of constituencies for the conduct of free, fair and just elections in District Rahim Yar Khan as envisaged in Section 20 of Election Act, 2017 and Rule 10 of the Election Rule, 2017. Furthermore, the just and fair creation of electoral constituencies is a prerequisite of just and fair elections, otherwise the election's results cannot attain legitimacy which resultantly would injure the credibility of the Election Commission.
- h. The proposal for Provincial Assembly constituencies for Rahim Yar Khan District is submitted as under:-

| PP No.        | Description of Area  | Population      |
|---------------|--|-----------------|
| <b>PP-255</b> | (A) The following QH of Tehsil Liaqat Pur.<br>i) Sidhuwali<br>ii) Allahabad<br>(B) The following PCs of Khan Bela QH<br>i) Fazil Pur / Dashti<br>ii) Bakhshu Banhar<br>iii) Thul Hamza<br>iv) Jhok Gulab Shah<br>v) Banah Roya | <b>3,56,466</b> |
|               | (C) The following PCs of Tarukari QH<br>i) Tranda Gurgaje<br>ii) Chak No. 133/NP<br>iii) Chak No. 137/NP<br>iv) Ahmad Yar  |                 |
| <b>PP-256</b> | A) The following QH of Tehsil Liaqat Pur<br>i) Shedani Sharif<br>B) The following PCs of Pakka Laran QH<br>i) Aminabad<br>ii) Chak No. 002/NP  | <b>3,55,304</b> |

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|               | <ul style="list-style-type: none"> <li>v) Pakka Laran</li> <li><b>C) The following PCs of Khan Bela QH</b> <ul style="list-style-type: none"> <li>i) Unran</li> <li>ii) Bet Diwan</li> <li>iii) Qadu Wali</li> <li>iv) Khan Bela</li> <li>v) Dufli Kabir Khan</li> </ul> </li> <li><b>D) The following PCs of Smooka QH of Tehsil Khan Pur</b> <ul style="list-style-type: none"> <li>i) Kot Shahan</li> <li>ii) Fateh Pur Kamal</li> <li>iii) Wahgowan</li> </ul> </li> </ul>   |                 |
| <b>PP-257</b> | <ul style="list-style-type: none"> <li><b>A) Liaqat Pur Municipal Committee</b></li> <li><b>B) The Following QH of Tehsil Liaqat Pur</b> <ul style="list-style-type: none"> <li>i) 1/L Abbasia (Cholistan)</li> <li>ii) 2/L Abbasia (Cholistan)</li> <li>iii) 2/R (Cholistan)</li> <li>iv) 7/R (Cholistan)</li> <li>v) Abbasia-I</li> <li>vi) Abbasia-II</li> <li>vii) Gulshan Farid (Cholistan)</li> <li>viii) Haider Shah (Cholistan)</li> <li>ix) Head Farid (Cholistan)</li> </ul> </li> <li><b>C) Tarukari QH excluding the following PCs</b> <ul style="list-style-type: none"> <li>i) Tranda Gurgaje</li> <li>ii) Chak No. 133/NP</li> <li>iii) Chak No. 137/NP</li> <li>iv) Ahmad Yar</li> </ul> </li> <li><b>D) The following PCs of Pakka Laran QH</b> <ul style="list-style-type: none"> <li>i) Arif Balooch</li> <li>ii) Chaharwala</li> <li>iii) Chak No. 1/NP Addl</li> <li>iv) Chak No. 001/NP addl</li> <li>v) Ther posti</li> </ul> </li> </ul> | <b>3,59,997</b> |
| <b>PP-258</b> | <ul style="list-style-type: none"> <li><b>A) The following QH of Tehsil Khan Pur</b> <ul style="list-style-type: none"> <li>i) Nawan Kot</li> <li>ii) Khan Pur-I</li> <li>iii) Khan Pur-II</li> </ul> </li> <li><b>B) The following PCs of Bagh-o-Bahar QH</b> <ul style="list-style-type: none"> <li>i) Dunya Pur Izafi</li> <li>ii) Dunya Pur</li> <li>iii) Latki</li> <li>iv) Musa Kanjun</li> <li>v) Mad Ilyas</li> <li>vi) Sehja</li> </ul> </li> <li><b>C) The following PCs of Garhi Ikhtiar Khan QH</b> <ul style="list-style-type: none"> <li>i) Gehmal Pir</li> <li>ii) Kot Ghunya</li> <li>iii) Sewa Ram</li> </ul> </li> <li><b>D) The following PCs of Jajja Abbasian QH</b> <ul style="list-style-type: none"> <li>i) Azim Shah Izafi</li> <li>ii) Azim Shah</li> <li>iii) Jampur</li> <li>iv) Kotla Pathan</li> </ul> </li> </ul>   | <b>3,60,666</b> |

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|               | vi) Jhoran<br>vii) Makhan Bela   |                 |
| <b>PP-259</b> | <p><b>A)</b> Municipal Committee Zahir Pir</p> <p><b>B)</b> Chachran Sharif QH</p> <p><b>C)</b> The following PCs of Garhi Ikhtiar Khan QH</p> <p>i) Dhandoo Kotla Khan Lar</p> <p>ii) Garhi Ikhtiar Khan</p> <p>iii) Ghulam Nabi Lar</p> <p>iv) Kot Daya</p> <p>v) Gullo Wali</p> <p>vi) Sheikh Abdul Sattar</p> <p><b>D)</b> The following PCs of Jajja Abbasian QH</p> <p>i) Khai Khair Shah</p> <p>ii) Jajja Abbasian</p> <p><b>E)</b> The following PCs of Samoka QH</p> <p>i. Chaudri</p> <p>ii. Ghazi Barar</p> <p>iii. Kotli Murad</p> <p>iv. Samoka</p> <p>v. Lanjiwar</p> <p>vi. Pai Ahna</p> <p><b>F)</b> The following PCs of Kot Samaba Mohal QH of Tehsil Rahim Yar Khan</p> <p>i. Bakhsh Aarain</p> <p>ii. Lalgah</p> <p><b>G)</b> The following PCs of Rukan Pur QH of Tehsil Rahim Yar Khan</p> <p>i. Bahadar Pur</p> <p>ii. Ghoush Pur Machian</p> <p>iii. Haji Pur</p> <p>iv. Missan</p> <p>v. Kotla Rai Qabool</p> | <b>3,57,049</b> |
| <b>PP-260</b> | <p><b>A)</b> Municipal Committee Khan Pur</p> <p><b>B)</b> Bhutta Sheikhan QH</p> <p><b>C)</b> The following PCs of Bagh-o-Bahar QH.</p> <p>vii) Sher Garh</p> <p>viii) Jhol</p> <p>ix) Chak No. 031/P</p> <p>x) Mari Allah Bachaya</p> <p>xi) Mandi Lar</p> <p><b>D)</b> The following PCs of Kot Samaba Abadi QH of Tehsil Rahim Yar Khan</p> <p>iii. Bismillahpur</p> <p>iv. Shah Garh</p> <p>v. Panwaran</p> <p>vi. Chak No. 82/P</p>  | <b>3,58,230</b> |
| <b>PP-261</b> | <p><b>A)</b> Rukan Pur QH of Tehsil Rahim Yar Khan excluding the following PCs</p> <p>i) Bahadar pur</p> <p>ii) Ghous Pur Machian</p> <p>iii) Haji Pur</p> <p>iv) Missan</p> <p>v) Kotla Rai Qabool</p> <p><b>B)</b> Kot Samaba Mohal QH</p>   | <b>3,71,590</b> |

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|               | <ul style="list-style-type: none"> <li>i) Bakhsh Aarain</li> <li>ii) Lalgarh</li> <li><b>C) Municipal Committee Kot Samaba</b></li> <li><b>D) Tranda Sawai Khan QH excluding the following PCs</b> <ul style="list-style-type: none"> <li>i) Amin Garh</li> <li>ii) Chenah</li> <li>iii) Sultan Pur</li> </ul> </li> <li><b>E) The following PCs of Taj Garh QH</b> <ul style="list-style-type: none"> <li>i) Chak Abbas</li> <li>ii) Kot Qutab</li> <li>iii) Tranda Ali Murad</li> </ul> </li> <li><b>F) The following PCs of Rajan Pur QH</b> <ul style="list-style-type: none"> <li>i) Daulat Pur</li> <li>ii) Ihsan Pur</li> </ul> </li> <li><b>G) The following PCs of Pallu Shah QH</b> <ul style="list-style-type: none"> <li>i) Butta Kot</li> <li>ii) Karam Abad</li> <li>iii) Pallu Shah</li> <li>iv) Rang Pur</li> </ul> </li> </ul>   |                 |
| <b>PP-262</b> | <b>A) Municipal Committee Rahim Yar Khan</b>  | <b>4,20,419</b> |
| <b>PP-263</b> | <ul style="list-style-type: none"> <li><b>A) The following QH of the Tehsil Rahim Yar Khan</b> <ul style="list-style-type: none"> <li>i) Bindore</li> <li>ii) Rahim Yar Khan-I</li> <li>iii) Rahim Yar Khan-II</li> </ul> </li> <li><b>B) The following PCs of Tranda Sawai Khan QH</b> <ul style="list-style-type: none"> <li>i) Amin Garh</li> <li>ii) Chenah</li> <li>iii) Sultan Pur</li> </ul> </li> <li><b>C) Municipal Committee Tranda Sawai Khan</b></li> <li><b>D) The following PCs of Kot Samaba Abadi QH</b> <ul style="list-style-type: none"> <li>i) Chak No. 51/P</li> <li>ii) Chak No. 240/P</li> <li>iii) Chak No. 246/P</li> <li>iv) Chak No. 53/P</li> </ul> </li> <li><b>E) The following PCs of Taj Garh QH</b> <ul style="list-style-type: none"> <li>i) Akram Abad</li> <li>ii) Kamal Mohana</li> <li>iii) Thalwari</li> <li>iv) Tibbi Laran</li> </ul> </li> </ul> | <b>3,82,494</b> |