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Before the Worthy Secretary to the Honourable Election Commission of Pakistan

Representation under section 21 of the Elections Act, 2017, read with rule 12 of the Election Rules, 2017, in respect of the delimitation of constituencies of Provincial Assembly of District Rahim Yar Khan particularly concerning proposed constituencies PP – 256, PP – 255 and PP – 257

Respectfully *Sheweth*:-

1. That the Petitioner is a permanent resident and voter of Pakka Larran, Tehsil Liaqatpur, District Rahim Yar Khan. The Petitioner is a veteran politician and social worker. Presently, the Petitioner is serving as Vice Chairman, Union Council Pakka Larran (UC No. 108) where he was elected in 2015. The Petitioner has also remained Councillor from the local area and has been participating in active politics since 1990. Welfare and betterment of people of his local area are paramount considerations for the Petitioner and he has been struggling for the same for a long time.
2. That the District Rahim Yar Khan has been allocated thirteen (13) constituencies / seats of Provincial Assembly of Punjab in the Preliminary Delimitation Report, 2018 published by this Honourable Commission on 05.03.2018.
3. That, through the instant representation, the Petitioner seeks the gracious indulgence of this Honourable Commission for incorporation of his proposals in the final list of constituencies particularly regarding PP-256 and as a result of this incorporation its impact on PP-255, PP-257 and PP-258.
4. That through the instant representation, the petitioner craves the gracious indulgence of this Honourable Commission to delimit the above constituencies namely PP-256, PP-255, PP-257 and PP-258 in the following manner:

I. The following Patwar Circles of Pakka Larran QH may be excluded from PP-257 and included in PP-256

- (i) Arif Baloch (Population 4969)
- (ii) Choharwala (Population 21348)
- (iii) Chak No. 1/NP Addl (Population 4817)
- (iv) Chak No. 001/NP (Population 6668)
- (v) Ther Posti (Population 7776)

Total Population 45578

II. The following Patwar Circle of Nawan Kot QH Tehsil Khan Pur may be excluded from PP-258 and included in PP-256

- (i) Izafi Nawan Kot (Population 8145)
- (ii) Nawany Arian (population 13665)

Total Population 21810

III. The following Patwar Circles of Khan Bela QH may be excluded from PP-256 and included in PP-255

- (i) Khan Bella (population 39489)
- (ii) Dufli Kabir Khan (Population 11482)
- (iii) Kadu Wali (Population 18279)

Total Population 69250

IV. The following Patwar Circles of Allah Abad QH Tehsil Liaqatpur may be excluded from PP-255 and included in PP-257

- (i) Chaudhry (population 13195)
- (ii) Ghot Mahi (Population 17531)
- (iii) Juma Mohana (Population 9005)
- (iv) Pakhiwar (Population 8908)
- (v) Talbani (Population 18560)

Total Population 67199

5. That after incorporation of the amendments / alterations or modifications suggested by the Petitioner the Population of above mentioned constituencies of the Provincial assembly of Punjab would be as follows:

(I) PP-255	Total Population:	376038
(II) PP-256	Total Population:	358875
(III) PP-257	Total Population:	381618
(IV) PP-258	Total Population:	335278

6. That being aggrieved by and dissatisfied with the part of list of constituencies, published in the Preliminary Delimitation Report, 2018, particularly specifying the areas proposed to be included in / excluded from proposed Provincial Assembly constituency PP-256 District Rahim Yar Khan and in the best interest of the population of the district as a whole, the Petitioner craves the kind indulgence of this Honourable Commission for making amendments, alterations or modifications as suggested / proposed by the Petitioner in paragraph 4 and 5 above, *inter alia*, on the following

Grounds

- (a) That a combined reading of section 20 of the Elections Act, 2017 and rule 10 of the Election Rules, 2017 reveals that the following principles and procedures are to be kept in mind at the time of making the delimitation of the constituencies:
 - (i) Distribution of population in geographically compact areas
 - (ii) Physical features
 - (iii) Existing boundaries of administrative units
 - (iv) Facilities of communication
 - (v) Public convenience
 - (vi) Other cognate factors to ensure homogeneity
 - (vii) The delimitation of constituencies of an Assembly shall start from the Northern end of the district; and
 - (viii) Then it will proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable
 - (ix) The variation in population between two or more constituencies shall not ordinarily exceed ten percent

- (b) That while preparing the Preliminary Delimitation Report, 2018 comprising of proposals for fresh delimitation of constituencies for Provincial Assembly of Punjab in Rahim Yar Khan District especially proposed PP – 256, it is respectfully submitted, the relevant Delimitation Committee failed to adhere to the above stated mandatory principles and procedures in letter and spirit therefore there is a need to revisit the said delimitation proposal by this Honourable Commission.
- (c) That while preparing delimitation report for proposed constituencies, the Delimitation Committee included the five (05) Patwar Circles of Pakka Larran QH in PP-257 without realising the fact that there is no direct access from these five (05) Patwar Circles of Pakka Larran QH to Liaqatpur city which is headquarters of PP-257 and the voters / locals of this area will have to go to firstly PP-256 and then PP-255 in order to reach PP-257. Whereas, these five (05) Patwar Circles of Pakka Larran QH are directly connected to headquarter of PP-256 and there is only a short distance. Therefore this constituency PP-257 proposed by Delimitation Committee has not been constituted in line with the statutory requirements and fails the guiding factors such as geographical compactness, facilities of communication and public convenience.
- (d) That if the proposal for delimitation made by the Delimitation Committee in its Preliminary Delimitation Report, 2018 is finalised without incorporating amendments, alterations or modifications proposed / suggested by the Petitioner in paragraph 4 and 5 above, the entire population of above detailed Patwar Circles would suffer irreparable loss and hardships and their miseries would increase manifold.
- (e) That the amendments, alterations or modifications proposed / suggested by the Petitioner in paragraph 4 and 5 above are for the sole purpose of providing compactness to the constituencies, for enhancing facilities of communication and ease to the inhabitants of the said areas.

In view of the foregoing, it is most respectfully prayed that the instant representation may kindly be accepted and the amendments, alterations or modifications proposed / suggested by the Petitioner in paragraph 4 and 5 of this representation may graciously be incorporated in the final report and list of constituencies showing the areas included in each constituency.

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The Petitioner also prays for the grant of any other relief to which he is found entitled by this Honourable Commission in law, justice and equity keeping in view facts and circumstances of the case.



Petitioner

Mohammad Abbas Khan s/o Ghulam Rasool Khan
R/o Basti Samanay Khan, Mauza Pacca Laran, Post Office Khas
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Through counsels



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