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**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 RAHIM YAR KHAN PP-258 & 260, ON BEHALF OF MIAN ABDUL GHAFFAR SON OF FAQIR MUHAMMAD, RESIDENT/VOTER OF CHAK NO.73/ABBASIA, KHANPUR, DISTRICT RAHIM YAR KHAN

Respectfully sheweth;

1. Brief facts of the matter are that the petitioner is a voter enrolled in electoral role of Chak No.73/Abbasia as Concuss block code 251020210 Sr. No.99, Khanpur District Rahim Yar Khan which falls within the constituency of PP-258. Petitioner is eligible to file the instant representation to raise the objection against the proposed delimitation of PP-258 & PP-260.
2. That while making the propose delimitation the area of PP-258 Rahim Yar Khan-IV and PP-

physical features were not kept in view, particularly the ways of communication have also not been given importance beside being not maintaining the existence boundaries of the Constituencies. Even the map prepared during delimitation process is also crafted wrongly in violation of Section 20 of Election Act 2017. The petitioners in order to get the same corrected make the following objections, to maintain geographical compactness of the area and to sustain the existing boundaries of the proposed delimitation:-

### GROUND OF OBJECTIONS

a. That the PP-258 Rahimyar Khan-IV is proposed in the delimitation as follows:

A) The following QH of Khanpur Tehsil:

i) Garhi Ikhtiar Khan	102368
ii) Jajja Abassian	107,182
iii) Nawan Kot	95594

A) The following PCs of Bago-Bahar QH of Khanpur Tehsil:

i) Dunya Pur Azafi	6292
ii) Dunya Pur	8798
iii) Latki	7865
iv) Musa Kanjo	13026
v) Sehja	15963
Total Population:	357,088

Whereas PP-260 Rahimyar Khan-VI is proposed as under:

A) Khanpur MC	184793
B) The following PCs of Khanpur Tehsil	

total population: 362,632

- b. That the Patwar Circle of petitioner i.e. Chak No.70/A Abbassia is included with PP-258, whereas the PC of petitioner is situated near to Khanpur MC but the same is included with the PP-258 which situated much away from the PC of the petitioner and by including it with PP-258 the geographical compactness have also been ignored. If PC Chak No.70/A Abbassia is included with PP-260 the seat in which Khanpur MC is falls there will be geographical compact area and even the map would show smooth and decent compact picture of the map. The PC of the petitioner is situated at a distance of 18-KM from MC and if it is seen on the map the same is falls in the east of the Khanpur MC. If it is remained allow with PP-258 in which the areas of west of Khanpur MC are located and distance of those areas from the PC of the petitioner is more than 40 Kilometers. Similarly PCs Gulan Gulkala(6692) and Jetha Bhutta(7946) which are located in other

next to the other areas of PP-258 the principle of geographical compactness and factor of homogeneity would also be achieved. It is pertinent to submit here that the people of PCs Gulan Gulkala(6692) and Jetha Bhutta(7946) have similar type of customs as the other people of PP-258 observing, whereas the customs of the population of Khan MC and adjoining areas are quite different to them. It will be more reasonable for the people of above described PCs to put them in PP-258 instead of driven them to PP-260. Contrary to the PC of the petitioner majority of people from that PC wants their inclusion with PP-260.

- c. That through the impugned delimitation the previous history of existing boundaries of constituencies have also not been taken into consideration and ways of communication, road network and ground reality has also been ignored and this error can be corrected by adopting the proposal of excluding patwar circles Gulan Gulkala(6692) & Jetha Bhutta(7946)

PP-258 and PC Chak No.70/A Abbasia with PP-260. In this way the population formula will also not be disturbed. Therefore, the formation of PP-258 will be as follows:

<b>(A) The following QHs of Khanpur Tehsil</b>	
i) Garhi Ikhtiar Khan:	102,368
ii) Jajja Abbasian	107,182
iv) Nawan Kot excluding 70/A PC	84613
<b>(B) The following QHs of Khanpur Tehsil</b>	
i) Duniyapur Azafi	6,292
ii) Dunya Pur	8,798
iii) Latki and	7,865
iv) Musa Kanjo	13,026
v) Sehja	15,693
<b>(C) The following PCs of Khanpur-I QH of Khanpur Tehsil:</b>	
i) Gulan Gulkala	6,692
ii) Jetha Bhutta	7,946
Total Population:	360,745

Similarly the formation of PP-260 will be as follows:

a) Khanpur MC	184,793
b) The Following PCs of Khanpur Tehsil	
i) Bhatta Sheikhan	70,652
ii) Khanpur-I excluding Patwar Circle	34549
a) Gulan Gulkala =	6692
b) Jetha Bhutta =	7946
(49187-14638 =	34549)
iii) Khanpur-ii	58,000
c) Chak No.70/A Patwar Circle of Nawa Kot QH	10981
Total:	358,975

d. That if the above proposals are accepted the population of PP-258 will be 360745 and population of PP-260 will be 358975

these constituencies will remain within the parameters of 10% which is permissible under the law.

In view of the above submissions, it is, therefore, most respectfully prayed that the PCs Gulan Gulkala(6692) and Jetha Bhutta(7946) may kindly be excluded from PP-260 by including the same in PP-258 and PC Chak No.70/A Abbasia may kindly be excluded from PP-258 and be included with PP-260.

**PETITIONER**

MIAN ABDUL GHAFAR SON OF FAQIR MUHAMMAD,  
RESIDENT/VOTER OF CHAK NO.73/ABBASIA, KHANPUR,  
DISTRICT RAHIM YAR KHAN

through

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

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