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THE SECRETARY, ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

MUHAMMAD SHAFQAT son of Ghulam Yaseen Khan, CNIC No. 31303-7957325-3, resident of Baloch House, Sonac, Tehsil & District Rahim Yar Khan. cell 03009603999.

.....Applicant/Objector

REPRESENTATION U/S 21 OF THE ELECTIONS ACT 2017 READ
WITH RULE 11 OF THE ELECTION RULES 2017 AGAINST
PRELIMINARY DELIMITATION OF TERRITORIAL CONSTITUENCY
OF PP-261 RAHIM YAR KHAN-VII.

Respectfully Sheweth;

1. That the applicant/objector is a voter member of the constituency of PP-261, Rahim Yar Khan-VII. The relevant portion of voter list/certificate of vote from the concerned office is annexed herewith.
2. That the applicant/objector is aggrieved by the preliminary delimitation of territorial constituency of PP-261, Rahim Yar Khan-VII (hereinafter to be referred as "impugned delimitation") and seeks its modification inter-alia on the following;

GROUNDS

- i) That the impugned delimitation as published in preliminary report and preliminary list is against the letter and spirit of the provisions of Section 20 of The Elections Act 2017 read with Rule 10 & 12 of The Election Rules 2017. It has failed to have regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication, public convenience and it has failed to take into account the

in the constituency. The administrative and revenue units, censes circles and censes blocks have also been ignored.

- ii) 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 Assembly seats, 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 having such territorial structure and no other provincial constituency is spread over so many National Assembly seats. The constituency spreads over an area of more than 100 kilometer from one end to another. Neither the voters nor the candidates will have an access from one area to another. The constituency has been delimited in such a way that some territory has been picked from previous five provincial constituencies and this constituency has been created. Previously the constituency was known as PP-291. The same area/territory is to be restored as PP-261 Rahim Yar Khan VII.
- iii) That the principle of homogeneity has been violated in the impugned preliminary delimitation. The railway line has historically been considered a sort of division within the district. The 'Daryai, Malki Belt' is on one side and the new settlements/'Chaks' and 'Cholistani Belt' is on the other side of the track. Both have their own set of issues, needs ~~and culture~~ and as such require their representation in the assembly and should not be marginalized.
- iv) That the impugned preliminary delimitation has resulted into Gerry Maundered shape of the constituency.
- v) That the impugned delimitation has been published without holding any inquiry and considering any material/ground realities and the legal requirements have not been met before publishing the impugned preliminary delimitation.
- vi) That the areas have been added without any justification and totally ignoring the principle that the old constituency should be less disturbed.
- vii) That as per new delimitation structure, the distribution of

convenience, whereas the same has been overlooked in the process of impugned preliminary delimitation. Hence, a suggested proposal is forwarded for the delimitation of PP-261, Rahim Yar Khan-VII, keeping in view the requirements of law. The proposed PP-261, Rahim Yar Khan-VII is as follows;

a) Kot Samaba MC;	31,984
b) The following QHs of Tehsil Rahim Yar Khan	
i) The following PCs of QH Rukanpur	54,124
a) Shah Pur;	
b) Rukan Pur;	
c) Pooran;	
d) Khalti;	
e) Kalar Wali; and	
ii) Kot Samaba Mohal	95,883
iii) The following PCs of QH Trinda Siwai Khan	16,959
a) Aslamabad;	
b) Wahi Jumman Shah;	
iv) The following PCs of QH Taj Garh	34,074
a) Trinda Ali Murad;	
b) Kot Qutab;	
c) Chak Abbas;	
Pallu Shah QH: excluding the following	52,633
PCs of Pallu Shah QH	
i) Badli Sharif,	
ii) Pir Abdul Malik	
iii) Kot Mehdi Shah	
v) Rajan Pur QH: including following PCs of	74,026
Rajan Pur QH	
i) Shaheed Wala	
ii) Abad Pur	
iii) Daulat Pur	
iv) Ihsan Pur	
v) Thul Wazir	

TOTAL POPULATION 3,59,683

PRAYER:

In view of the above submissions, it is, most humbly prayed that impugned preliminary delimitation of PP-261, Rahim Yar Khan-VII

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delimitation be published as proposed in para No. (vii) of grounds above in the representation.

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Applicant/Objector

Through

S.U. Zahid.

SANA ULLAH ZAHID
Advocate
Supreme Court of Pakistan.

[Handwritten signature]
SAJID MEHMOOD SHAD
Advocate High Court

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