

To,

The Secretary,  
Election Commission of Pakistan,  
Islamabad.

Subject: **REPRESENTATION U/S 21(3) OF THE ELECTION ACT, 2017 AGAINST THE PRELIMINARY DELIMITATION OF THE CONTITUENCY IN RESPECT OF PP-272 & PP-273 MUZZAFARGARH NOTIFIED ON 05.03.2018**

Respected Sir,

With reference to Notification No. F.8(3)/2018-Elec-I dated 05.03.2018, regarding publication of preliminary report of delimitation of constituencies of National Assemblies and Provincial Assemblies, I hereby filed objections against the above said preliminary delimitation of national and provincial constituencies PP-272 & PP-273 Muzaffargarh as under:

1. That the principles laid down in section 20 of the Election Act, 2017 and rule 12 of the Election Rules, 2017 have not been complied with in stricto-senso.
2. That geographically compact area means natural and political division of the earth which seems to be one unit. Unfortunately the preliminary delimitation in respect of PP-272 & PP-273 Muzaffargarh is not in consonance with the geographical nature of the area.
3. That the next principle of delimitation is physical feature which is also correlated with the first one. Rule 10(2) of the Election Rules, 2017 specifically provides physical

Muzaffargarh-VI, the first part spread over settled area and the other one is tribal area i.e. Tommer Wala, Hanjrai Ghair Mustaqil Gharbi, Jannu Mustaqil, and Tibba Ghair Mustaqil Sharqi. The access of settled area residents is impossible in the second part of constituency. The cultural values and norms of both the portions are quite different and they cannot live together. The above tribal area of PP-273 has the same culture and values of the tribal area of PP-272, therefore, its attachment with PP-273 is against the above provision of Act.

4. That the residents of tribal area have relations with the residents of tribal area of the other constituency i.e. PP-272, whereas the residents of settled area have agnation with the residence of settled area PP-273 Muzaffargarh-VI. The tribal head when ordered to do something, all the tribes have to follow even against their will. Their mindset is like a dictator, due to their harsh attitude no one can think to oppose them. When the delimitation work started by the Honourable Commission, the Hinjra tribals openly threatened that the delimitation of PP-273 Muzaffargarh-VI will be got done according to their wishes as under;

- i. MC Chowk Sarwar Shaheed & QH.
- ii. QH Diara Din Panah & MC
- iii. QH Kot Addu-I excluding following PCs:  
Chak No.145 ML, 521, 525, 528, 578 TDA Pittal K.A  
Mustaqil Gharbi & Sharqi Talari Nur Shah Gharbi

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The above information was floated among the residents through social media. Extracts of the Facebook Account of Mr. Ahmed Abdullah are enclosed for kind perusal which was posted on 10.02.2018 much prior to the delimitation work. It has been mentioned in the above post, that Dr. Younas who intended to contest election from the proposed PP-273, after having gone through above delimitation has decided not to contest the election. Moreover a news item was appeared in the daily Ausaf Multan dated 01.03.2018 that the political leaders of Chow Sarwar Shaheed have got delimited the constituencies according to their wishes and the residents of the constituency are much perturbed. The preliminary delimitation which was not still notified was condemned.

5. That most important fact which determines all other factors is facility of communication and public convenience. In the instant case public road transport facilities of settled area are much better than the tribal area which naturally and geographically is attached with PP-272 Muzaffargarh instead of PP-273.

6. So far as cognate factor is concerned, naturally the people have relations with the people where they feel convenient and have communication facilities. Accordingly residents of settled area have close relations of the other part of constituency, similarly the tribals have to keep intact with the tribals of PP-272.

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7. That the rule of northern end has not been followed in the delimitation of PP-272 & PP-273 Muzaffargarh, which is against the natural justice. Since this rule has been applied in the number of cases of other districts, therefore, equality demands that the same may also be applied while delimiting PP-272 & PP-273 Muzaffargarh and if this rule is applied, the above patwar circles will automatically be included in PP-272 Muzaffargarh.

8. It is worthwhile to mention here that the total population mentioned in the notification against PP-273 is 318,574 whereas actually the total population is 394,786. Apparently it looks like a typographical mistake on the part of office but if someone tries to read between the lines, it is corroboratory evidence and endorses the pre-planned rigging which has been disclosed earlier in the preceding paragraph. Not only the total population of PP-273 is incorrect but the population of PP-272 is also incorrect. Against PP-272 the population has been 349,666 whereas, the total comes to 327,699. On this score alone, the demand of petitioner is prima facie, merits consideration and fully proves the apprehension of the residents of PP-273.

9. That the population of Patwar Circles mentioned above is 23,794 and if the said figure is excluded from the 394,786, there left the population of PP-273, only 371,037 and the said population may be included in PP-272, the population will become 373,460 according to the

... it will be 251,403

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will be appropriate otherwise the percentage prescribed has been badly violated. Unfortunately the true picture has not been placed before the Honourable Commission and this has been done with malafide intention or in connivance with the political leaders of PP-272 & 273 who intend to rig the election through such illegal means which can also be said pre-poll rigging.

10. Preliminary and proposed delimitation is given here under in an annotated form:

Preliminary Delimitation			Proposed Delimitation		
Constituency No.	Description	Population	Constituency No.	Description	Population
PP-272 Muzafargarh-V	(a) The following QHs of Kot Addu Tehsil (1) Kot Addu-II; and (2) The following PCs of Kot Addu-I HQ; (i)145/M.L (ii)251/TDA (iii)525/TDA (iv)528/TDA (v)578/TDA (vi) Pattal Kot Addu Mustaqil Gharbi (vii) Pattal Kot Addul Mustaqil Sharqi (viii)Talaee Nur Shah Gharbi (ix)Talaee Nur Shah Sharqi (b)Kot Addu MC of Muzaffargarh District	349,666	PP-272 Muzafargarh-V	(a) The following QHs of Kot Addu Tehsil (1) Kot Addu-II; and (2) The following PCs of Kot Addu-I HQ; (i)145/M.L (ii)251/TDA (iii)525/TDA (iv)528/TDA (v)578/TDA (vi) Pattal Kot Addu Mustaqil Gharbi (vii) Pattal Kot Addul Mustaqil Sharqi (viii)Talaee Nur Shah Gharbi (ix)Talaee Nur Shah Sharqi (b)Kot Addu MC (C) the following partwar circles of Daira Din Panah QH; (i) Tommer	373,460 (it is according to the ECP whereas, actually it will be 351,493) 327,699 + 23794

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				Mustaqil Gharbi, (iii)Jannu Mustaqil, and; (iv) Tibba Ghair Mustaqil Sharqi of Muzaffargarh District	
	<b>Total</b>	<b>349,666</b>		<b>Total</b>	<b>373,460 Or 351,493</b>
PP-273 Muzaffargarh-VI	(a) the following QHs of Kot Addu Tehsil; (1) Chowk Sarwar Shaheed; (2)Daira Din Panah; and (3)Kot Addu-1 excluding the following PCs; (i) 154/M.L (ii)521/TDA (iii)525/TDA (iv)528/TDA (v)578/TDA (vi)578/TDA (vii)Pattal Kot Addu Mustaqil Sharqi (viii) Talace Nur Shah Gharbi (ix)Talace Nur Shah Sharqi (b)Kot Sarwar Shaheed MC (c) Daira Din Panah MC of Muzaffargarh District	318,574	PP-273 Muzaffargarh-VI	(a) the following QHs of Kot Addu Tehsil; (1) Chowk Sarwar Shaheed; (2)Daira Din Panah QH excluding the following patwar circles; (i) Tommer Wala, (ii) Hanjrai Ghair Mustaqil Gharbi, (iii)Jannu Mustaqil, and; (iv) Tibba Ghair Mustaqil Sharqi; (3)Kot Addu-1 excluding the following PCs; (i) 154/M.L (ii)521/TDA (iii)525/TDA (iv)528/TDA (v)578/TDA (vi)578/TDA (vii)Pattal Kot Addu Mustaqil Sharqi (viii) Talace Nur Shah Gharbi (ix)Talace Nur Shah Sharqi (b)Kot Sarwar Shaheed MC (c) Daira Din Panah MC of Muzaffargarh District	370,992
	<b>Total</b>	<b>318,574</b>		<b>Total</b>	<b>370,992</b>

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**NOTE:** Since both the PPs fall within one National Assembly Constituency, there is no need to propose any amendment any other constituency.

**PRAYER:**

That in the light of above legal/factual position, the following amendments in the preliminary delimitation of PP-272 & 273 Muzaffargarh-V & VI respectively are suggested:

Sr.#	Constituency No.	Description	Population
i.	PP-272 Muzaffargarh-V	(a) The following QHs of Kot Addu Tehsil (1) Kot Addu-II; and (2) The following PCs of Kot Addu-I HQ; (i)145/M.L (ii)251/TDA (iii)525/TDA (iv)528/TDA (v)578/TDA (vi) Pattal Kot Addu Mustaqil Gharbi (vii) Pattal Kot Addul Mustaqil Sharqi (viii)Talaee Nur Shah Gharbi (ix)Talaee Nur Shah Sharqi (b)Kot Addu MC (C) the following partwar circles of Daira Din Panah QH; (i) Tommer Wala, (ii) Hanjrai Ghair Mustaqil Gharbi, (iii)Jannu Mustaqil, and; (iv) Tibba Ghair Mustaqil Sharqi of Muzaffargarh District	373,460 (it is according to the ECP whereas, actually it will be 351,493)  327,699 + 23794
		<b>Total</b>	<b>373,460 Or 351,493</b>
ii.	PP-273 Muzaffargarh- VI	(a) the following QHs of Kot Addu Tehsil; (1) Chowk Sarwar Shaheed; (2)Daira Din Panah QH excluding the following patwar circles; (i) Tommer Wala, (ii) Hanjrai Ghair Mustaqil Gharbi,	370,992

		(3)Kot Addu-1 excluding the following PCs; (i) 154/M.L (ii)521/TDA (iii)525/TDA (iv)528/TDA (v)578/TDA (vi)578/TDA (vii)Pattal Kot Addu Mustaqil Sharqi (viii) Talace Nur Shah Gharbi (ix)Talace Nur Shah Sharqi (b)Kot Sarwar Shaheed MC (c) Daira Din Panah MC of Muzaffargarh District	
		<b>Total</b>	<b>370,992</b>

Keeping in view the position stated above, it is requested that proposed amendments in PP-272 & 273 Muzaffargarh-V & VI which have been made purely in the public interest according to the Act and Rules may kindly be accepted and delimitation of above Provincial Assembly constituencies may very kindly be amended accordingly, please (Copies of census data, extracts of voter lists and maps are enclosed for perusal).

Petitioner

*Muhammad Junaid*  
over

**Muhammad Junaid**

S/o Rana Muhammad Ashraf,  
Resident of Chak No.584 TDA, Chowk Sarwar Shaheed,  
Tehsil Kot Addu & District Muzaffargarh.  
Vote # Statistics Block Code:237120406  
Silsa No.914, Voter Area Circle No.4,  
Kot Addue District Muzaffargarh

Through

*Ghulam Muhammad Khan*

**Ghulam Muhammad Khan**

Advocate High Court