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**BEFORE THE HONOURABLE DELIMITATION  
AUTHORITY, ELECTION COMMISSION OF PAKISTAN,  
ISLAMABAD**

Delimitation Representation No. \_\_\_\_\_/2018

Ch. Muhammad Masood Akhtar S/o Ch. Farzand Ali, Caste  
Rajput, R/o Mohallah Ch. Farzand Ali, Municipal Committee  
Rajanpur, Tehsil & District Rajanpur, Cell No. 0333-6448431  
.....Applicant

**VERSUS**

Delimitation Committee, Punjab, Lahore through its  
Convener

.....Respondent

**REPRESENTATION UNDER SECTION 21 OF THE  
ELECTION ACT, 2017, READ WITH RULES 12 & 13, OF THE  
ELECTION RULES, 2017, AGAINST THE PRELIMINARY  
PROPOSAL FOR DELIMITATION NOTIFIED ON 05.03.2018,  
FOR FORMULATION OF CONSTITUENCY PP-295 TO PP-  
296, RAJANPUR-III TO IV, WHICH ARE FORMULATED  
AND DELIMITED AGAINST THE SCHEME OF SECTION 20  
OF THE ACT IBID AND RULES FRAMED THEREUNDER  
COUPLED WITH GUIDELINES AND REGULATIONS  
ISSUED TIME TO TIME, RESULTANTLY, THE SAME ARE  
LIABLE TO BE ADJUDGED ILLEGAL, UNLAWFUL,  
UNWARRANTED BY LAW AND WITHOUT LAWFUL  
AUTHORITY AS BEING AGAINST THE PRINCIPLES OF  
HOMOGENEITY, COMPACTNESS, PUBLIC CONVENIENCE  
AND FAIRNESS TO AVOID THE TRUE VOICE OF MASSES,  
WHO HAVE BEEN DEPRIVED FROM THE RIGHT OF  
CHOICE OF REAL REPRESENTATION, WHICH  
TANTAMOUNT TO PRE-ELECTION RIGGING AND IN  
CONSEQUENCE THEREOF THE PROPOSALS /  
SUGGESTIONS / OBJECTIONS RAISED INFRA BY THE  
APPLICANT, ARE LIABLE TO BE ALLOWED WHILE  
IMPLEMENTING THE SAME IN FINAL DELIMITATION AS  
MANDATED BY THE LAW ON THE SUBJECT**

Respectfully Sheweth:-

1. That the applicant is a voter of Constituency PP-296,  
Rajanpur-IV, and his name is duly placed in Electoral Roll  
of Chota Bazar, Municipal Committee Rajanpur, Tehsil and

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District Rajanpur. The applicant is an active political worker and has great concern with the process of delimitation as being citizen/inhabitant of the locality and relating to political family of Rajanpur. The applicant is also blessed by Allah Almighty to represent locality. Copy attached as **Annexure "A"**.

2. That the respondent while taking exercise of Preliminary Proposal under Section 19 & 20 of the Election Act, 2017, and Rules framed thereunder notified on 05.03.2018, on Form No. 05, under Rule 10 (7) of the Election Rules, 2017, however, the applicant and the public at large of the locality were neither called to give real account of delimitation as mandated by law nor the principles, guidelines and regulations were taken into account, which ultimately burdening this Honourable Election Commission of Pakistan to bear great toll of blood and sweat to know the miseries caused by this preliminary delimitation, hence, these objections / suggestions / proposals are set out to mend the preliminary delimitation.
3. That as per requisition of law, certified copies of maps alongwith preliminary delimitation notified by the respondent are respectively placed as **Annexure "B & C"**.
4. That PP-296, Rajanpur-IV, is the only constituency which is designed to incorporate maximum urbanized area with the basic features when Municipal Committee QH

Rajanpur and Municipal Committee Kot Mithan, QH Kot Mithan and QH Kotla Naseer, are united together with a specific point of view of Urban Area as the same is defined in the Punjab Local Government Act, 2013. So far as, the question of QH Rajanpur Colony is concerned, it is divided into 03 distinct patches. It runs from North to South and its some areas of QH Rajanpur Colony are in contiguity with PP-295, Rajanpur-III, and others are integral part of PP-296, Rajanpur-IV. This factum further may be appreciated in the sense that some of the areas of QH Rajanpur Colony falling under the limits of Police Station Saddar, Rajanpur and the rest of areas fall in Police Station Kot Mithan. This distribution of Police Local Limits further fortifies that the contiguity is entirely different from pace to pace. The distribution of QH Rajanpur Colony is to be made in a sensible way by observing the 'principle of contiguity and clockwise encirclement. The homogeneity of areas coupled with population is another factor which could resolve the real issue before this Honourable Commission.

5. That before advancing the objections / suggestions / proposals, it is useful to keep in mind that the District Rajanpur is the remotest District of Punjab and the factor of transportation is also a problematic issue for moving one side to other, some areas of Colony / State Land / De-

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excluded areas and geographically being in arduous features with adding divisions made by mighty Indus River, Canal Work and in this situation the womenfolk who are eligible voters bound by cultures to avoid casting of votes due to inconveniences, so the delimitation is liable to be made in a such manner to rule out these natural barriers, which further aggravates when voluminous area are least populous, so the mechanism of delimitation is needed to be taken more wisely and tactfully when 03 Tehsils i.e. Rajanpur, Jampur and Rojhan have unbalanced population inter-se, then the Administrative Units are needed to be divided carefully and the schemes of Local Government areas needed to be kept intact in order to avoid any anomalous situation. The conversant of geography, culture (Homogeneity of Population) with homogeneity of areas coupled with convenience are the real stick yard for all purposes of delimitation process, but unfortunately, the same are lacking in preliminary delimitation, which constrained the applicant to knock at the doors of this Honourable Forum, hence, the instant petition.

6. That it is quite useful to reproduce the Order of preliminary delimitation for comparative purpose:-

PP-293, Rajan Pur-I

(a) The following QH of Jampur Tehsil:

1. Jam Pur
2. Kot Janun
3. Dajal excluding the following Patwar Circles
  - i. Harrand
  - ii. Basti Mayo
  - iii. Tufki
  - iv. Allahabad Gharbi
  - v. Basti Hanbhi

(b) Chacha QH of De-excluded area

(c) Jam Pur MC and

(d) Dajal TC (old)

Of Rajan Pur District

Total

401325

PP-294, Rajan Pur-II

a) The following QH of Jampur Tehsil:

1. Kotla Mughlan
2. Muhammad Pur
3. Isran
4. The following PCs of Dajal QH
  - i. Harrand
  - ii. Basti Mayo
  - iii. Tufki
  - iv. Allahabad Gharbi
  - v. Basti Hanbhi

5. The following PCs of Haji Pur QH

- i. Bahar Hussain
- ii. Drigri
- iii. Gulabi and

b) QH Shum Khul Kash of De-excluded area

Of Rajan Pur District

Total

392893

PP-295, Rajan Pur-III

a) Haji Pur QH of Jampur Tehsil excluding the following PCs:

- i. Bahar Hussain
- ii. Dirgi
- iii. Gulabi

b) The following QH of Rajan Pur Tehsil

1. Fazal Pur
2. Fazal Pur Colony
3. Kotla Isan and

c) Fazal Pur MC

Of Rajan Pur District

Total

380234

PP-296, Rajan Pur-IV

(a) The following HQ of Rajan Pur Tehsil

1. Rajan Pur
2. Rajan Pur Colony
3. Kotla Naseer
4. Kot Mithan

(b) Rajan Pur MC and

(c) Kot Mithan MC

Of Rajan Pur District

Total

408621

PP-297, Rajan Pur-V

a) Rojhan Tehsil and

b) Ozman QH of de-excluded area

Of District Rajan Pur

Total

412885

7. That it is evident from the record that the PCs of Rajanpur Colony QH are split in 03 different geographical units, which are neither adjacent nor have any symmetry rather the whole QH Rajanpur Colony is available in different size of different areas. Likewise constituency of PP-295, Rajanpur-III, is not accordance with the Section 20 of the Election Act, 2017, which constrained the applicant to move before this Honourable Commission. And on the other hand, the proposed structure in preliminary delimitation regarding PP-296, Rajanpur-IV, is also injured due to these irregularities, for which it is just and proper to put forth the objections, suggestions and proposals, inter-alia, amongst other

**GROUND:-**

- a. That the PC of Paharpur is made part and parcel of PP-296, Rajanpur-IV, but surrounding areas of PC Shikarpur and Aqilpur of QH Kotla Isan are liable to be included in PP-296, Rajanpur-IV, and the area shown in PP-295, Rajanpur-III, is liable to be excluded therefrom and accordingly as per notification, it may kindly be sustained alongwith surrounding areas of said PCs. This suggestion is quite delightful and is also convenient for all purposes of contiguity and hormone of population and the area.

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- b. That PCs of QH Rajanpur Colony namely Chak Sadiqabad, Chak Shaheed and Patti Imam Bakhsh are liable to be included in PP-295, Rajanpur-III, as clockwise principle attracts the same.
- c. That the population scale of QH Rajanpur Colony is 51979 whereas Chak Sadiqabad (5546), Chak Shaheed (7617), Patti Imam Bakhsh (2995), Chak Talook (2734), Patti Makhdoom Sahib (1701) and Patti Ahmed Khan (2418) with total population of 23061, are liable to be made part and parcel of PP-295, Rajanpur-III, whereagainst, the rest of PCs of Rajanpur Colony be left accordingly, without any addition or omission, as proposed by the preliminary delimitation.
- d. That Chak Shaheed is consisting of PCs Chak Dumra, Chak Haji, Chak Halwani, Chak Kot Zubairi and Chak Shaheed, with total population of 7667, which are integral part of PP-295, Rajanpur-III, are liable to be excluded from PP-296, Rajanpur-IV, by incorporating these PCs into PP-295, Rajanpur-III, as Local Government area while PCs & QH are the same. Whereas, total population scale of Chaks



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Sadiqabad, Shaheed, Talook, Pattis Imam Bakhsh, Makhdoom Sahib and Ahmed Khan, are liable to be excluded accordingly, while making part and parcel of PP-295, Rajanpur-III.

e. That the factors mentioned in Section 20 of the Act ibid duly approved by law and delimitation is liable to be accorded accordingly. Neither clockwise principle attracted nor the other factors were considered. Shikarpur and Aqilpur supra are unequivocally of the same nature, which could not be segregated from PP-296, Rajanpur-IV, hence, preliminary delimitation are liable to be set aside by this Honourable Commission by accepting the proposals of the applicant.

f. That the demand station of proposal and suggestions are hereby demonstrated in proposal chart and map, which may kindly be deemed to be an integral part of instant proposals and suggestions.

g. That further submission will be made at the time of arguments.

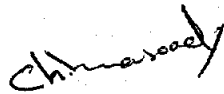
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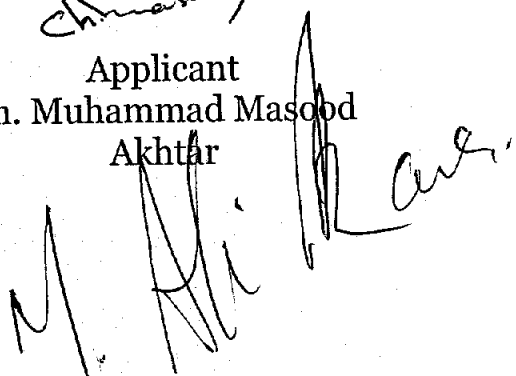
It is, therefore, respectfully prayed that by accepting the instant representation, the preliminary delimitation notified on 05.03.2018, by respondent may graciously be adjudged illegal, unlawful, unwarranted by law and without lawful authority as being against the principles of homogeneity, compactness, public convenience and fairness as envisaged in the Section 20 of the Election Act, 2017, and Rules framed thereunder.

It is further prayed that the objections, proposals and suggestions submitted by the applicant, may graciously be allowed and the same may kindly be implemented while finalizing the Delimitation Process, in the supreme interest of general public, justice and conduct of fair elections.

Any other relief which this Honourable Election Commission of Pakistan deems fit and appropriate, may graciously be awarded to the applicant.

Through:-

  
Applicant  
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Akhtar

  
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Dated: 03.04.2018