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BEFORE THE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD

Representation No. _____/2018

Faisal Khalid S/o Muhammad Khalid Ali, R/o Chah Dilawarwala, P/o Sarai
Muhajir, Khanpur Shumali, Tehsil & District Bhakkar. (Cell # 0333-8900123)

Applicant

VERSUS

Election Commission of Pakistan through its secretary, Shahra-e-Dastoor,
Islamabad.

Respondent

**REPRESENTATION/OBJECTION PETITION U/S 21(3) OF ELECTION ACT,
2017 READ WITH RULE 12, OF ELECTION RULES, 2017 WITH ENABLING
PROVISIONS OF LAW REGARDING THE DELIMITATION OF
CONSTITUENCIES.**

Respectfully Sheweth:-

1. That applicant is a voter member of provincial Assembly constituency PP-
91 Bhakkar-III having Silsla No. 205, Gharana No. 83, PC Khanpur Shumali,
Tehsil & District Bhakkar. Copy of registration along with CNIC is attached
as **Annexure A to A/1.**

2. That in pursuance of delimitation of constituencies the respondent has

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3. That applicant is directly and substantially being aggrieved from delimitation of constituency PP-91 Bhakkar-III as the said notified constituency is not in accordance with the requirement and rules and other prevailing laws.
 4. That applicant seeks amendments and impugned the said delimitation inter alia on the following amongst other:-

GROUND S

- a. That delimitation of constituency regarding District Bhakkar and provincial Assembly namely PP-91 is in violation of statutory principles for the purpose of delimitation as stipulated in the act.
- b. That for the purpose of delimitation process certain rules are provided through the act *ibid*. Principle rule thereof can be categorized as under:-
 - i. Uniform Distribution.
 - ii. Geographical Compactness and Territorial unity.
 - iii. Existing boundaries of Administrative Limits.
 - iv. Facility of Communication.
 - v. Public Convenience.
- c. That notified constituency is not delimited according to the principles and rules as categorized earlier which is clear violation of law and rules as provided in the act.
- d. That it may please be appreciated that a fair comparison of notified and proposed constituency in District Bhakkar lead to an apparent conclusion that purpose of delimitation is to facilitate the public at large and to avoid from public inconvenience but present delimited

- e. That entire idea behind the delimitation of National and provincial Assembly are to provide easy and convenient accessibility to voter to approach their representatives, but this concept was totally negated keeping in view the notified constituency. It can also be seen that the notified constituency has not been delimited into geographical compactness area and is highly inconvenient to the people who have to travel long distance to take access their elected members for solving their problems.
- f. That according to impugned notification the constituency PP-89 Bhakkar-I Kalorkot population is 419105, whereas PP-90 Bhakkar-II Darya Khan Population is 400678, PP-91 Bhakkar-III Mankeera Population is 411647 and PP-92 Bhakkar-IV Population is 419088.
- g. That it is worth pertinent to mention here that some of the Patwar Circles i.e P.C Khansra having the population 7651, PC 191/TDA with 1636, PC 193/TDA with 1897 and PC 195/TDA with 3514 total population 14698 having no compact block and has no easy access for the people of this area and has easy access for the people of PP-90 Bhakkar-II Darya Khan, thus, these should be excluded from PP-91 Bhakkar-III and be included in PP-90 Bhakkar-II which is adjacent to these patwar circles and in consequence of entire exercise population of PP-90 Bhakkar-II Darya Khan would be 415376 which is in accordance with rules and laws.
- h. That in consequence whereof for purpose of uniform distribution of population patwar circle Chheena Dagar having population 15409 which is already a part of Halqa Qanoon Goi as notified constituency PP-91 Bhakkar-III Mankeera and patwar circle Notak Dagar having

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and be included in PP-92 Bhakkar-IV on the basis of geographical compactness and in consequence population of PP-91 Bhakkar -III would be 410544 and PP-92 Bhakkar-IV would be 405493 which is according to the prevailing laws and rules. For assistance and ready reference copy of the MAP is attached here with as Annexure C. Hence this representation.

In view of the submissions made above and keeping in view the eventualities, factual and actual facts, it is most respectfully prayed that instant representation/objection petition may very graciously be accepted and the notified constituency be cancelled/rectified and be constituted in accordance with the constituency proposed through this representation. The reconstituted constituencies may kindly be notified as the final list of the constituencies under the governed rules and policies.

Any other relief which this Hon'ble Commission deems fit may also be granted.

Fasil

Applicant/Objection Petitioner

Through

Mohammad Ahsan Bhoon

Mohammad Ahsan Bhoon

Advocate Supreme Court of Pakistan

Asif Iqbal Khan Shahani

Asif Iqbal Khan Shahani

Declared on Oath before me

By..... *Mohammad Ahsan Bhoon* Advocate High Court

S/o..... *Mohammad Ahsan Bhoon* 14- Aiwan-e-Shah Chiragh, The Mall, Lahore.

Identified..... *Asif Iqbal Khan Shahani* Cell: 0334-8337060



VERIFICATION

Muhammad Nawaz
OATH COMMISSIONER
LAHORE