

BEFORE THE ELECTION COMMISSION OF PAKISTAN, ELECTION
COMMISSION SECRETARIATE ISLAMABAD, PAKISTAN.

M. J. Khan
3/4/18

MUSHTAQ AHMAD S/O AHMAD BAKSH R/O Moza Ghughyanah
Tehsil & District Jhang.

V/S

The delimitation Committee (for Punjab) Election Commission of
Pakistan. Islamabad Pakistan.

REPRESENTATION

Under Section 21 (3) Elections Act 2017 Read with Rule
12 & 13 of Election Rule 2017.

For alterations/modification and readjustment of PP- 124
Jhang-I PP-125 Jhang-II PP-127 Jhang-IV PP-128
Jhang-V PP-129 Jhang-VI PP-130 Jhang-VII District
Jhang.

Respectfully Sheweth:

1. That the petitioner is presently registered voter of PP-125
Jhang-II District Jhang.
2. That notification No.F8(3)2018-Elc-L dated 05th March
2018 the whole constituencies changed and divided into
the four Provincial Assemblies constituencies without

petitioner knowledge in preliminary report of list of constituencies of National and Provincial Assemblies.

3. That the petitioner is aggrieved by the new delimitation and seeks proposed delimitation in PP-124, PP-125, PP-127 PP-128 PP-129 and PP-130 District Jhang without bring any major changes in the said constituencies of District Jhang under the following amongst other:-

Grounds

- i. That the new delimitation of PP-124, PP-125 PP-127, PP-128 PP-129 & PP-130 of district Jhang as published in preliminary report ad preliminary list is against the provision of section 20 of Election Act 2017 read with Rule 12 of Election Rule 2017.
- ii. That the election commission of Pakistan and the delimitation committee constituted for Punjab, in the delimitation process of PP-125 in such a way and included Massan QH of tehsil Jhang without the considering the basic Sprit of section 20 of election Act 2017 red with rule 12 of election rule 2017 without any justification and without observing the grounds realties. It is pertinent to mention the people/voter member of QH Massan by inclusion of Massan QH in PP-125 Jhang-II are likely to

face great hardship, problem and in-convinces as there is no road access, passage, existed to approach PP-125 as QH Massan situated between the two river. That more than 100 Kilometers distains between the Massan and other abadies of PP-125 and only access and approach to the other abadies of PP-125 is by river.

- iii. That inclusion of Massan QH in PP-125 Jhang-II totally disturb the compactness, physical feature, existing boundaries of administrative unit, facilities of public convinces, cognate factor to insure homogeneity in the creation of constituencies.
- iv. The exclusion of following patwar circle of Meernay Wala QH, Tehsil Ahmad Pur Sial, Hassu Bulail PC, Bahrh Gharbi PC, Fatah Pur Pirti PC and Islam Pur Nashaib from PP-125 Jhang totally against the principal of lesser disturbances of old constituencies and also ignored that by exclusion of said areas totally disturb the compactness, physical feature, existing boundaries of administrative unit, facilities of and public, cognate factor to insure homogeneity in the creation of constituency.
- v. That the Patwar circles of Meernay Wala QH mentioned in above said para excluded from PP-125 and included in PP-129

and PP-130 is against the basic policy of delimitation and also against the basic principal of rule 10 (5) of election rules 2017, as delimitation of constituencies shell start from northern of district, are case be the agency and than proceed clock wise and zig zag manner keeping in view the populating among the constituencies shell remained as close as may be practicable.

- vi. But the delimitation committee totally over look the requirement of law in this regard.
- vii. That it is settled law that the Census circle should be divided and effecting of the constituencies, whereas, the same has been done against the procedure laid by the law.
- viii. That as per delimitation notified of 5th March 2018 as the area of PP-124 PP-125 PP-127 PP-128 PP-129 & PP-130 have been added and excluded without any justification and totally against the principle of, that the old constituencies should be less disturbed.
- ix. That a table of delimitation published on 5th of March 2018 is given below along with the population.

PP-124 Jhang

The following QH of Jhang Tehsil

- i. Kot Isa Shah
- ii. Qadar Pur
- iii. Hassam
- iv. Shah Jeewana
- v. Kheawa

vi. Cheela

Of Jhang District

Total

401775

PP-125 Jhang-II

- i. Tehsil 18 Hazari
- ii. Massan QH Jhang Tehsil
- iii. Following Patwar Circle of Maghiana QH Tehsil
Jhang
 - i. Kot Diwan
 - ii. Kot Khera
 - iii. Malhuana
 - iv. Mansul Sial
 - v. Mohal

Of Jhang District

Total

395119

PP-126 Jhang-III

i. Jhang MC

of Jhang District

Total

414131

PP-127 Jhang-IV.

(a) The following QH of Jhang Tehsil

- i. Jhang Urban
- ii. Jhang No.2
- iii. Mochian Wala

(b) The following PCs of Kot Lakhnana QH of Jhang
Tehsil .

- i. Chak No.216 J.B

- ii. Chak No.446 J.B
- iii. Chak No. 447 J.B
- iv. Chak No.449 J.B
- v. Chak No.454 J.B

Of Jhang District

Total

391539

PP-128 Jhang V

Old TC Bagh

(b) Magiana QH of Jhang Tehsil

Excluding following PCs

- i. Diwan
- ii. Kot Khera
- iii. Malhuana
- iv. Mansul Sial
- v. Mohal

(c) Kot Laknana QH of Jhang Tehsil excluding following PCs

- i. ak No.216 J.B
- ii. Chak No.446 J.B
- iii. Chak No. 447 J.B
- iv. Chak No.449 J.B
- v. Chak No.454 J.B

(d) The following QHS of Shorkoat Tehsil

- i. Hawali Bahadar Shah
- ii. Kot Lal and
- iii. Mirak Sial excluding following PCs
 - a. Yarewali
 - b. Hasuwali

Of Jhang District.

Total

377067

PP-129 Jhang-VI

- (a) Shorkoat MC
- (b) Shorkoat Cantt
- (c) The following QH of Shorkoat Tehsil
 - i. Shorkot City-I
 - ii. Shorkoat City-II
 - iii. Shorkoat Cantt and
 - iv. Kaki Nau
- (d) The following PCs of Mirak Sial QH of Shorkoat Tehsil
 - i. Yare Wali and
 - ii. Hasso Wali
- (d) The following PCs of Marnewala QH of Ahmad Pur Sial Tehsil
 - i. Mad Rajbana
 - ii. Marnewala
 - iii. Sabqi
 - iv. Nako Kara
 - v. Islam Pur Nashaib
 - vi. Fatah Pur Priti

Of Jhang District

Total

386682

PP-130 Jhang-VII

- (a) Tehsil Ahmad Pur Sial excluding following PCs of marnewala QH
 - i. Mad Rajbana
 - ii. Marnewala

- iii. Sabqi
- iv. Nako Kara
- v. Islam Pur Nashaib
- vi. Fatah Pur Priti

Of Jhang District

Total

377772

- x. That as per the delimitation published vide notification of 5th March 2018, the structure, the distribution of population has be geographically compact area Facilitating public convince whereas, the same has been over looked in the process of present delimitation. Hence it forwarded to your honor for the delimitation of PP-124, PP-125, PP-127 PP-128 PP-129 and PP-130 in view of the requirement of the law.
- xi. That it is fundamental right of every voter of every constituency that he would have all the basic facilities like easy excess availability of roads, transports, and distribution of population in delimitation of constituency that after the division of constituency of particularly PP-124 to PP-130 the delimitation committee totally ignored the structure, the distribution population geographically competences of areas, facilitative public convince. Hence being aggrieved the petitioner purposed delimitation/modification plan is forwarded to your honor for the delimitation of PP-124, PP-125, PP-127 to PP-130 in accordance with the requirement of law of delimitation in the greater interest of public at large of the said constituency.

That the proposed delimitation of PP-125 PP-127 PP-128
PP-129 PP-130 is following.

PP-124 Jhang

The following QH of Jhang Tehsil

i. Kot Isa Shah	Population	53501
ii. Qadar Pur	Population	40147
iii. Hassam	Population	92403
iv. Shah Jeewana	Population	68452
v. Cheela	Population	59535
vi. Massan QH	Population	43436
vii. Kheawa QH excluding the following PCs		49868
i. Ballo Shahbal		
ii. Bhochrah		
iii. Khanowana		
iv. Satyanah		
v. Khewah		

Of Jhang District

Total

407342

PP-125 Jhang-II

A. Tehsil 18 Hazari	Population	295801
B. Following Patwar Circle of Maghiana QH Tehsil Jhang		
i. Kot Diwan	Population	5815
ii. Kot Khera	Population	17208
iii. Malhuana	Population	21075
iv. Mansul Sial	Population	7880
v. Mohal	Population	3804

C. The following patwar circle Merenwala QH Tehsil
Ahmad Pur Sial

i.	Baharh Gharbi	Population	9401
ii.	Hasso Bulail	Population	17089
iii.	Islam Pur Nashaib	Population	4035
iv.	Fatah Pur Priti	Population	13593
	Total	Population	395801

PP-126 Jhang-III

i. Jhang MC
of Jhang District

Total 414131

PP-127 Jhang-IV.

(a) The following QH of Jhang Tehsil

i.	Jhang Urban	Population	128929
ii.	Jhang No.2	Population	77486
iii.	Mochian Wala	Population	138722

(b) The following PCs of Khewah QH of Jhang Tehsil .

i.	Ballo Shahbal	Population	7565
ii.	Bhochrah	Population	4562
iii.	Khanowana	Population	7707
iv.	Satyanah	Population	10347
v.	Khewah	Population	12075

Total 387393

PP-128 Jhang V

Old TC Bagh

(b) Magiana QH of Jhang Tehsil

Excluding following PCs .

- i. Diwan
- ii. Kot Khera
- iii. Malhuana
- iv. Mansul Sial
- v. Mohal

(b) Kot Laknana QH of Jhang Tehsil

(c) The following QHS of Shorkoat Tehsil

- i. Hawali Bahadar Shah
- ii. Kot Lal and

(c) Mirak Sial excluding following PCs

- i. Yare Wali
- ii. Hasso Wali
- iii. Allah Yar Juata
- iv. Frid Mehmood Khathia
- v. Qaim Barwana

Total

382487

PP-129 Jhang-VI

(e) Shorkoat MC

(f) Shorkoat Cantt

(g) The following QH of Shorkoat Tehsil

- i. Shorkot City-I

- ii. Shorkoat City-II
- iii. Shorkoat Cantt and
- iv. Kaki Nau

(d) The following PCs of Mirak Sial QH of Shorkoat Tehsil

- i. Yare Wali
- ii. Hasso Wali
- iii. Allah Yar Juata
- iv. Frid Mehmood Khathia
- v. Qaim Barwana

Total	371920
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PP-130 Jhang-VII

(d) Tehsil Ahmad Pur Sial excluding following PCs of marnewala QH

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|------|-------------------|------------|-------|
| i. | Baharh Gharbi | Population | 9401 |
| ii. | Hasso Bulail | Population | 17089 |
| iii. | Islam Pur Nashaib | Population | 4035 |
| iv. | Fatah Pur Priti | Population | 13593 |

Total	389399
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- xii. That there are only minor changes in the proposed delimitation plan which never damage the requirement and fulfillment of Section 20 (3) of Election Act 2017, rather it is a true sprit of Section 20 (3) of Election Act 2017.

That the proposed delimitation plan of constituencies is most suitable and convenient to the public at large of the said constituencies in terms of section 20 (3) Election Act 2017.

- xiii. That the marked maps of constituencies, unmarked maps of constituencies and proposed maps of constituencies are attached herewith as Annexure "A, B & C".

In view of the submission it is humbly that the proposed plan of delimitation of constituencies PP-124, PP-125, PP-127, PP-128 PP-129 & PP-130 may kindly be accepted and final list of delimitation of the said constituencies may kindly be declared as proposed delimitation of the said constituencies.

Any other relief which the Honourable Election Commission of Pakistan deems appropriate / fit may kindly also be awarded.

Petitioner

MUSTAFA Ahmed

Through Counsel:-



Mian Mujahid Hussain

Advocate High Court,
53,57 Allama Iqbal Law Chambers,
District Courts, Faisalabad.