THE SECRETARY, ELECTION COMMISSION OF PAKISTAN ISLAMABAD

Petition.NO_____2018

PETITIONER:

<u>Muzafar Mehmood S/O Mian Sultan Mehmood</u> R/O Wasu Astana Post post office Same Tehsil 18 Hazari District Jhang

New Constituency = PP 125-Jhang- II

REPRESENTATION

UNDER SECTION 21(3) OF ELECTIONS ACT 2017 READ WITH RULE 12 OF ELECTION RULES 2017 FOR AMENDMENT/CHANGES/ MODIFICATIONS IN PRELIMINARY CONSTITUENCY OF PP 125- PUBLISHED BY THE ELECTION COMMISSION OF PAKISTAN

Respectfully Sheweth:-

Facts

- 1) That the petitioner is the registered voter/and his name is in Block Code 258030904 at Serial NO 302 of voters list of Mauza Wasu Astana falling in constituency PP-125-Jhang.
- 2) That the Preliminary constituency is comprised of 4 Qanungo Halqas herein after referred as Q.H and Municipal Committee of Tehsil 18 Hazari District Jhang. The whole Tehsil 18 Hazari included. And its population =295801.
- 3) Complete Massan (Q.H) of Tehsil Jhang population = 43436
- 4) Out of Maghiana (Q.H) OF Tehsil Jhang the following Five Patwar Circles have been made part of the said Constituency:
- a) Mansoor Sial (P.C) Population =7980
- b) Malwana (P.C) Population =21075
- c) Kot Dewan (P.C) Population =8515
- d) Mohal (P.C) Population = 3804
- e) Kot Khaira (P.C) Population =17028

 Total population of P.P. 125 = 395119

2

5. The petitioner is aggrieved of the preliminary delimitation of constituency of PP 125-Jhang-II structured without his Participation/knowledge which requires certain changes/ modification within the Scope of Law on the subject on the following amongst others:-

GROUNDS:

(a) That the Delimitation of the New Constituency in issue is not in conformity and in line with the Provisions of Law envisaged and contemplated in Section 20 of the Elections Act 2017 and Rules 10 and 12 of Election Rules 2017 which occasioned inconveniencies not only to the Peoples of Halqa in moot but also to the Peoples of the adjacent Constituencies. PP.

(b) Proposals For Changes/Modifications

- i. Dhoin Muhammad (P.C) of Maghiana (Q.H) with Population 4516 may be included in Halqa PP-125 Jhang-II after excluding it from Halqa PP-128 Jhang-V.
- ii. In replacement of Dhoin Muhammad (P.C), Kot Khaira (P.C) of Maghiana (Q.H) with population 17028 may be included in Halqa PP-128 Jhang-V after excluding it from Halqa PP-125 Jhang-II.
- iii. Najabat (P.C) with Population 3182 and Chella (P.C) with population 7847 of Chella (Q.H) of may be included in Halqa PP-125 Jhang-II after excluding it from PP-124 Jhang-I.

(c) Reasons/Grounds Of Changes/Modifications:

- (1) Dhoin Muhammad (P.C) with Population 4516 of Maghiana (Q.H) has been included in Constituency PP 128 Jhang-V as per list of preliminary constituencies at Sr. No 162 which is situated amongst/ surrounded by Mansoor Sial (P.C), (b) Maluana (P.C), (c) Kot Dewan (P.C). These three (P.C) of Magiana (Q.H) and Rasheed Pur (P.C) of 18 hazari (Q.H). Dhoin. Muhammad is land locked with these (P.C) and also Gate Way of these (P.C). However, Dhoin Muhammad (P.C) has been shown in P.P 125 in the Map Prepared by the ECP.
- (a) Dhoin Muhammad (P.C) is geographically connected with the afore said (P.C).
- (b) Dhoin Muhammad (P.C) has been included in Halqa PP-128.

(3)

Dhoin Muhammad (P.C) falls under/ near bridge (**Head Tarumu**) which links/connects Tehsil 18 Hazari and of Maghiana (P.C) OF Maghiana (Q.H) which is included in constituency 128 and is only route of communication, to PP 125. The Peoples of Maghiana (Q.H) for going to other five (P.C) of this Qanungo Halqa have to adopt this route/passage.

ii. The inconveniences of the people of Halqa PP 125 can be redressed/retrieved if Kot Khaira with population -17028 is included in Halqa PP 128.which is already adjacent to and connected with it after taking from Halqa PP 125.

iii. The entry into Massan (Q.H) is through (**Boat bridge**) which is located between Chela (P.C) population 7847, Najabat (P.C) (3182) of Chela (Q.H) of Tehsil Jhang meaning there by that for entry in Massan (Q.H). One has to cross Chela (P.C) and Najabat (P.C) and to overcome this problem/hurdle these two (P.C) may be included in Constituency PP-125 instead of Halqa PP-124.

iv. If the aforesaid valid and feasible proposals are aacepted/carried out, the population of three Constituencies of PP- 124,PP-125 and PP- 128 will become more rational and almost equal. The population of these Halqas according to New constituencies is following:

<u>Halqa PP-124</u> <u>Halqa PP-125</u> <u>Halqa PP-128</u>

401775 395119 377067

After Acceptance of Proposals:

Halqa PP-124 Halqa PP-125 Halqa PP-128

3, 90,746 3, 93,636 389579

This table shows/demonstrates that if the representation is accepted the population of three Halqas will become almost in equal ratio with the minor difference which is covered within the scope of variation of 10% as per law on the subject.

Public Convenience

Dhoin Muhammad (P.C) FALLS IN

8364/43

- ii. LIMIT OF police station 18 Hazari
- iii. Near to Boy Degree College 18 Hazari,
- iv. Girls Degree College under construction in Mauza Malkana,
 Tehsil Head quarter (T.H Q) hospital 18 Hazari. These places of Facilities
 are adjacent to the neighboring Mauzas.
- v. In the case of acceptance of proposals of the applicant, it will not create problem of Public transport to the People of three Halqas being network of roads will be available to all without any inconvenience.
- vi. That the suggestions/proposal requested above in detail squarely meet the criteria mandated in Section 20 of the Election Act 2017.
- vii. The applicant has no objection regarding delimitation of constituencies of P.P. 126,127,129,130 of Jhang.

Prayer

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In face of the above narrated facts, and circumstances and law on the subject it is respectfully submitted that the representation/ may kindly be accepted and the changes/ amendments/modifications in the preliminary Constituency PP- 125-Jhang II Published in official Guzzet Election Commission of Pakistan may kindly be made to delimit It to meet the requirement of law mandated in Section 20 of The Elections Act 2017 read with Rule 12 of Elections Rule 2017 to foster the cause of justice and to overcome the genuine inconveniences/Problems of the Three PP- Halqas 124,125,128 significantly Peoples of (PP-125 Jhang-II).

Any other appropriate relief, as an alternative may be granted.

Petitioner

Through:

CH.MUHAMMAD AMIN JAVAID

Advocate Supreme Court, Al-Qadar Centre, II-Floor, 1-Mozang Road, Lahore.