## BEFORE THE ELECTION COMMISSION OF PAKISTAN ISLAMABAD.

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REPRESENTATION UNDER SECTION 21, 22 OF THE ELECTION ACT 2017 READ WITH RULE 12 OF HE ELECTION RULES 2017 AGAINST THE PROPOSED DELIMITATION OF PROVINCIAL ASSEMBLY CONSTITUENCY PP-246 BAHAWALPUR-II DISTRICT BAHAWALPUR FOR THE REASONS BELOW.

## Respectfully Sheweth:

- 1. That the petitioner is a registered voter of the proposed constituency of PP 246 Bahawalpur-II of District Bahawalpur. The attested extract of voter list showing petitioner as voter is attached as Annexure "A".
- 2. That the proposed constituency of PP-246 Bahawalpur-II consist of 3,85,486 voters. The adjacent constituency of PP-252 Bahawalpur-viii District Bahawalpur consist of 3,38,411 votes.
- 3. That while delimiting constituencies of District Bahawalpur, areas of two union councils namely no.20 and 21 (Fatoowali and Rama) have been added to PP-246 Bahawalpur-II detaching the same from PP-252 Bahawalpur-viii. This new addition consist of 35,235 votes. The deducting of this area / votes from PP-252 Bahawalpur VIII and its addition to PP 246

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is impracticable, against geophraic compactness, physical features, existing boundaries of administrative units, facilitates of communication, public convenience and wrong distribution of population. It is evident that if the newly added areas of union councils 20 and 21 (Fatoowali and Rama) are dethatched from PP-252 Bahawalpur-viii are kept the part of the same constituency i.e., PP252 Bahawalpur viii it would result.

- a. just and fair division of population as PP-246
  Bahawalpur-II would be consisting of 350251 votes
  whereas PP-252 Bahawalpur-viii would consist of
  3,38,411 votes. This is a perfect and justified division of
  population.
- b. that the areas of union council 20 and 21 (Fatoowali and Rama) added to PP-246 Bahawalpur-II have been part of constituency now numbered as PP-252 Bahawalpur-VIII, for last many decades. A sudden change in the constituency of a good chunk of people would cause in public inconvenience.
- c. that most of the area PP-246 is urban having geographic compactness and uniform facilities of communication. Adding up the area / votes of union council No. 20 and 21 (Fatoowali and Rama) (rural in nature) would not represent a happy blending of the geographic and demographic features.

## PROPOSAL.

That PP-246 and PP-252 may be reconstituted in the following manner:-

a. The area of the U.C 20 and 21 (Fatoowali & Rama) be detached / substrated from PP246 Bahawalpur-II and

added upto PP252 Bahawalpur-viii as it has been the case of last many decades.

## <u>PRAYER</u>

It is therefore humbly prayed that constituencies PP-246 and PP-252 may kindly be reconstituted by substarching areas of U.C Nos. 20 and 21 (Fatoowali and Rama) from PP-246 Bahawalpur-II and be added up with the constituency PP-252 Bahawalpur-viii by accepting this instant representation.

Applicant

Muhammad Imran son of Ch. Abdul Ghani R/o Kousar Colony, Bahawalpur

Through Counsel

(BILAL AHMED QAZI)
Advocate Supreme Court,
Seat at Bahawalpur.