

**BEFORE THE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD**

M. H. Khan  
3/13/18

3-7.

Representation No \_\_\_\_\_ / 2018

Syed Naseem Abbas Bukhari son of Syed Zulfiqar Hussain Bukhari, Caste Syed Bukhari, R/o Najaf  
Saddat, Januwala, P.O. Khas, Tehsil Ahmedpur East, District Bahawalpur.

...Petitioner

VERSUS

Delimitation Committee, Province of Punjab, Election Commission of Pakistan, Constitution Avenue,  
Islamabad

...Respondent

Representation under Rule 12, read with Rule 10 of the Election Rules,  
2017 read with Section 20 of the Elections Act, 2017 in respect of  
Constituency of the Provincial Assembly, PP-269 Patwari Circle  
Januwala, Qanoongoi, Mubarakpur, District Bahawalpur

Respectfully Submitted:

1. That the petitioner is the voter of the constituency PP-269 and vote of the petitioner is registered as Serial No. 302, block code No243060402 of Electoral Area Januwala, Mubarakpur Tehsil Ahmedpur East, District Bahawalpur. The petitioner is a political and democratic activist. The petitioner is permanent resident of Najaf Saddat Januwala, P.O. Khas, Tehsil Ahmedpur East, District Bahawalpur comprising of Circle No. \_\_\_\_\_ of Charge No. \_\_\_\_\_ of Bahawalpur District. Petitioner is an active political worker and family of the petitioner in particular has been playing an important role in the Local Government Elections and General Elections since 1961. Petitioner is well versed with the constituency. Copies of maps are herewith attached.
2. Therefore, the petitioner brings before this honorable Commission and assails the Delimitation of Constituency in respect of PP-269 Mubarakpur, Tehsil Ahmedpur East,

4  
M. Khan  
3/12/18

District Bahawalpur under section 12 of the Election Rules, 2017. Before parting with the Grounds for the representation and Summary of the constituency, it is to mention over here that the population according to 1998 census of Bahawalpur District was 24, 33,091 and number of seats allocated to Bahawalpur were 5 for the National Assembly and 10 for the Provincial Assembly. In delimitation of 2018, the number of either Provincial or National Assembly seats has not been changed and remains the same but geographical boundaries of the constituencies have been disturbed drastically. For better assistance of the Honorable Commission The Summary of the Constituency is as under:

| Nomenclature   | PP-254 BAHAWALPUR-VIII   |
|--|--|
| Total Population   |  |
| Quota of the District on PP seat   |  |
| Quota of the Province on PP seat   |  |
| Population of the District Bahawalpur as per 2017 Census   |  |
| Constituency PP-252 as formed by ECP   | Following QH of Bahawalpur Saddar Tehsil <ul style="list-style-type: none"> <li>• Samasatta (TC) Old</li> <li>• Qasimpur</li> <li>• Kalanchwala</li> <li>• NoorpurNauranga</li> <li>• Khanqah Sharif</li> <li>• Janu Wala PC of Mubarakpur QH</li> </ul> Population: 3, 38, 411  |
| Proposed limits of the Constituency (PP-252) and Constituency position if Representation is accepted with Total Population | Following QH of Bahawalpur Saddar Tehsil <ul style="list-style-type: none"> <li>• Samasatta (TC) Old</li> <li>• Qasimpur</li> <li>• Kalanchwala</li> <li>• NoorpurNauranga</li> <li>• Khanqah Sharif</li> <li>• Chak 12/BC &amp; Chak 28/BC PCs of Baghdad-ul-Jadid QH of Bahawalpur Saddar</li> </ul> Population: 3, 37, 909  |
| Constituency PP-251 & PP-249 as formed by ECP with Population  | <b>PP-251:---</b><br>Following QH of Ahmadpur East <ul style="list-style-type: none"> <li>• Mandhal</li> <li>• Hatheji</li> <li>• Kotla Musa Khan</li> <li>• Mubarkpur QH Excluding Janu Wala PC</li> </ul> Population: 3, 62, 812<br><br><b>PP-249:---</b><br>Yazman Municipal Committee<br>Following QH of Yazman Tehsil <ul style="list-style-type: none"> <li>• Yazman I</li> <li>• Yazman II</li> <li>• Ladamsir (Cholistan)</li> <li>• Kudwala</li> </ul> Following PCs of Tailwala Qh <ul style="list-style-type: none"> <li>• Chak No. 59/DB</li> <li>• Chak No. 65/DB</li> </ul> Population: 3, 80, 878<br><br>Following QH of Bahawalpur Saddar <ul style="list-style-type: none"> <li>• Baghdad-ul-Jadid</li> <li>• Hamatian</li> </ul> |

|   |  |
|---|--|
| <p><b>Proposed limits of the Constituency (PP-251 &amp; PP-249 position if Representation is accepted with Population</b></p> | <p><b>PP-251:---</b><br/> <b>Following QH of Ahmadpur East</b></p> <ul style="list-style-type: none"> <li>• Mandhal</li> <li>• Hatheji</li> <li>• Kotla Musa Khan</li> <li>• Mubarkpur</li> </ul> <p style="text-align: right;">Population: 3, 85, 729</p> <p><b>PP-249:---</b><br/> <b>Yazman Municipal Committee</b><br/> <b>Following QH of Yazman Tehsil</b></p> <ul style="list-style-type: none"> <li>• Yazman I</li> <li>• Yazman II</li> <li>• Ladamsir (Cholistan)</li> <li>• Kudwala</li> </ul> <p style="text-align: right;">Population: 3, 58, 463</p> <p><b>Following PCs of Tailwala Qh</b></p> <ul style="list-style-type: none"> <li>• Chak No. 59/DB</li> <li>• Chak No. 65/DB</li> </ul> <p><b>Following QH of Bahawalpur Saddar</b></p> <ul style="list-style-type: none"> <li>• Hamatian</li> <li>• Baghdad-ul-Jadid Excluding Chak 12/BC &amp; 28/BC PCs</li> </ul> |
|---|--|

5  
 M/K  
 3/13/12

**GROUNDS**

- a. That the Delimitation of the Constituency is in violation to section 20 of the Elections Act, 2017 and standards of Delimitation and the proposal of the petitioner is according to the said law and merits to be allowed, resultantly the representation merits to be accepted and the Constituency merits to be Delimited as proposed, accordingly.
- b. That it is worth mentioning here that, the father of the applicant was two time elected District Member Council and also two times elected Nazim of Mouza Januwala.
- c. That the applicant is ex-Member of Tehsil Council Ahmedpur East, PP-269 new 251 now ejected the Circle Januwala and mentioned in PP.252 old 270.
- d. That the Delimitation of the Constituency **PP-269 Mubarakpur** is in violation of the Principles of Representativeness, Equality & Non-Discrimination. The proposal of the petitioner is in line with the said Principles, which makes the constituency homogeneous.
- e. That the constituency has been delimited vividly affecting the equal voting power and Doctrine of Equal Suffrage. The weight of the less developed area in the present delimitation of the constituency has been brought to none in

M. Adh  
21/3/18

terms of its voting power. Thus, the delimitation cannot be said to fall in ambit of being fair and transparent.

- f. That it has been laid down by the Full bench of the Lahore High Court in pronouncement cited at PLD 2014 Lahore 221 [ARSHAD MAHMOOD Vs COMMISSIONER/DELIMITATION AUTHORITY GUJRANWALA &Ors] that Basic Object of Delimitation was to so far as practicable equal representation for equal segments of the population in the legislative bodies. It has to be done in order to secure the principle of One Person, One Vote, One Value.
- g. That it is inevitable in the process of delimitation to ignore the features which guard against possible fear of Vote Dilution and Disenfranchisement. The constituency PP-269 has been formed in such a way detaching the population which was homogenous and those areas have been attached to constituency where they will be alien to the other constituency and will have no representativeness or equality as enunciated under the law.
- h. That the constituency's particular segment of population has been scattered in three constituencies whereas following the Principles as laid down in section 20 of the Elections Act 2017 and Policy of the ECP as spelled out in the notification dated 05-03-2018, the detached areas were completely homogenous, geographically compact and in contiguity.
- i. That the population of two PCs attached with PP-269 is nor homogenous with the rest of the Population of PP-269 and will be deprived of the Representativeness and Equal Suffrage. Similar case is with Janu Wala PC which has been attached with PP-252 old PP-270 as it never remained in the constituency of provincial assembly now called PP-252 ever and moreover the administrative work of Janu Wala PC is related and maintained with Ahmadpur Tehsil.
- j. That as per Rule 10(4) of the Election Rules 2017, the constituency of an Assembly was to start from Northern end of the District and then proceed

Handwritten notes: "M. Khan" and "31/3/18"

clockwise. It is suspicious that in the Delimitation of 2017 the Northern end of the District was considered to start from Ahmadpur tehsil and now called NA-184 BAHAWALPUR and from there the delimitation started. Surprisingly, in present delimitation the constituency which was third (then NA-1) in 2002 delimitation was considered to be first and from here the delimitation started.

**PRAYER**

*Therefore, it is humbly prayed that the instant representation may very kindly be allowed and accepted and the Constituency PP-269 may very kindly be delimited as proposed by the petitioner in accordance with law.*

*Any other relief which this honorable commission deems fit may also be granted in the supreme interest of justice.*

PETITIONER

*[Handwritten signature]*

Through

*[Large handwritten signature in Urdu script]*