### BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

Muhammad Asif Raees son of Raees Rasool Bukhsh resident of Qadir Pur, P.O. Fateh Pur Kamal, Tehsil Khan Pur, District Rahim Yar Khan.

# Subject: REPRESENTATION UNDER SECTION 21 OF THE ELECTION ACT, 2017.

Respectfully Sheweth:

- 1. That the petitioner belongs to District Rahim Yar Khan having Vote at serial No.523, Census Block Code 2510902014, Electoral Area Qadir Pur, Khanpur, District Rahim Yar Khan. The respondent has made preliminary list of delimitation of constituencies for District Rahim Yar Khan as PP-255 Rahim Yar Khan-I, PP-256 Rahim Yar Khan-II, PP-257 Rahim Yar Khan-III, PP-258 Rahim Yar Khan-VI and PP-259 Rahim Yar Khan-VI for the Provincial Assembly Punjab.
- That the Delimitation Committee Punjab has made following preliminary list of delimitation of constituencies for District Rahim Yar Khan Provincial Assembly of Punjab.

## PROPOSAL OF CONSTITUENCIES OF DISTRICT RAHIM YAR KHAN ON BEHALF OF THE PETITIONER:

No. &	Name	of	Extent of the Constituency	Population
Constitue	ency			·
PP-255		Yar	(a) Following QH of Tehsil Liaqat	373987
Khan-I			Pur;	
			i. Sidhuwali and	
			ii. Allah Abad	
			(b) Following PCs of Khan Bala	
			QH	
			i. Fazil Pur	
			ii. Bakhsu Banhar	
			iii. Thul Hamza	
•			i. Unran	
			ii. Jhok Gulan Shah	
			iii.Bet Diwan and	
			i. Banah Roya	
			c. Following PC of Tarukari QH:-	
			i. Taranda Gurgage	
			ii. Chak No.133/NP	
			iii. Chak No.137/NP and	
			iv. Ahmed Yar	
			Of District Rahim Yar Khan	
PP-256	Rahim	Yar	I- Liaqat Pur	385991
Khan-II			II- Shedani Sharif	
			III- Pakka Laran excluding	
			Following PCS:-	
			a. Arif Balocch	
			b. Choharwala	İ
			c. Chak No.1/NP Additional	
			d. Chak No.001/NP; and	
			e. Ther Post	
			f. Khan Bets excluding	
			Following PCs;	
•			T11 D	

a. Fazil Pur

h Dakhcho Banhr

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	i. Sidhuwali and
	ii. Allah Abad
	(b) Folliowing PCs of Khan
	Bala QH
	i. Fazil Pur
	ii. Bakhsu Banhar
	iii.Thul Hamza
	iv. Unran
	v. Jhok Gulan Shah
	vi. Bet Diwan and
	vii. Banah Roya
	c. Following PC of Tarukari
	QH:-
	i. Taranda Gurgage
	ii. Chak No.133/NP
	iii.Chak No.137/NP and
	iv. Ahmed Yar
	Of District Rahim Yar
	Khan
PP-256 Rahim	I- Liaqat Pur 360737
Yar Khan-II	II- Shedani Sharif
•	III- Pakka Laran excluding
	Following PCS:-
	a. Arif Balocch
	b. Choharwala
	c. Chak No.1/NP Additional
	d. Chak No.001/NP; and
	e. Ther Post
	f. Khan Bets excluding
	Following PCs; a. Fazil Pur
	b. Bakhsho Banhr
	c. Thul Hamza
	d. Unran
	e. Jhok Gulab Shah
	f. Bet Diwan and
	g. Banah Royap
	The following PCs of
	Samooka QH or Tehsil
·    -	Khanpur:-
	i. Chaudhri

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	vi. Wahgowan;
	of District Rahim Yar Khan
PP-257 Rahim Var Khan-III	b. The Following QH of Tehsil Liaqat Pur;- i. 1/L Abbasia (Cholistan) ii. 2/L Ababsia (Cholistan) iii. 2/R (Cholistan) iv. 7/R (Cholistan) v. Abbasia-I vi. Abbasia-II vii. Gulshan Farid (Cholistan): viii. Haider Shah (Cholistan) And
1	ix. Head Farid (Cholistan)
	(c) The Tarukkari QH excluding following PCs i. Trinda Gurgail; ii. Chak No.1333/NP iii. Chak No.137/NP; and iv. Ahmad Yar; d. The following PCs of Pakka Laran QH:-
	i. Arif BAlopoch ii. Chahrwala iii. Chak No.1/NP Addl: iv. Chak No.001/NP; and v. Ther Posti Of District Rahim Yar Khan
FP-258 Rahim Yar Khan-IV	a. The Following QH of Tehsil 357088 Khan Pur:- i. Ghari Ikhtiar Khan ii. Jajja Abbasian and iii. Nawan Kot
	b. The Following PCS of Bagh- o-Bahar QH of Tehsil Khanpur:-
į	i. Dunya Pur Izafi

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PD 250 P	Of District Rahim Yar Khan.	
PP-259 Rahim Var Khan-V	a. Zahir Pir MC: b. Chachran Sharif QH c. The following PCs of Samoka QH:- i. Kotli Murad ii. Lanjhwar; and iii. Pai Ahna d. Rukan Pur QH of Tehsil Rahim Yar Khan e. The following PCc of Kot Samaba Mohal QH of Tehsil Rahim Yar Khan:- i. Dunya Pur Ganga ii. Fateh Pur Qureshian iii. Miawnali Qureshian iiv. Muhammad pur Qureshian And v. Sikandar Abad (f) Rang Pur PC of Pallu Shah QH of Tehsil Rahim Yar Khan of District Rahim Yar Khan	364816

That being aggrieved and dissatisfied with the above said preliminary list of delimitation of constituencies dated 05.03.2018, the petitioner preferred representation, legal objections, inter-alia, on the following grounds: -

### **GROUNDS**

a. That the petitioner is registered voter of Qadir Pur
Tehsil Khan Pur District Rahim Yar Khan as such
entitled to make representation to raise objections for

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- b. That the petitioner has been contested the local council elections of Union Council Qadir Pur, Tehsil Khan Pur District Rahim Yar Khan and succeeded to elected as Chairman of Union Council Qadir Pur District Rahim Yar Khan, Punjab.
- c. That preliminary proposal of delimitation provincial assembly seats in District Rahim Yar Khan has been issued while violating the geographic compactness of the areas, physical features, existing boundaries of administrative units, facilities of communication, public convenience and cognate factors to ensure homogeneity in the creation of constituencies in District Rahim Yar Khan as enumerated in Section 20 of the Elections Act 2017 and Rules 7,8,9 and 10 of the Elections Rules 2017.
- d. That the delimitation committee has proposed the preliminary list of the constituencies for Provincial Assembly of Punjab in District Rahim Yar Khan keeping aside the guidelines given in the Act and

e. That in the preliminary list of constituencies there has been gross violation of sub section 1 of section 20 of the Election Act 2017 by not considering the existing boundaries of administrative unit intact, which requires to keep the existing boundaries of administration unit in tact as far as practicable. The boundaries of administrative units have not been divided conveniently without applying the principles as laid down in the Act 2017 and Rules. While creating preliminary list of delimitation constituencies. the delimitation committee had disturbed the Halqa Qanoon Goi of Samoka and Patwar Circles viz Kotli Murad PC, Lanjwar PC, and Pai Ahna PC which would result into grave hardships for the public at large to approach the central part of respective areas, health units/hospitals, Courts, communications interaction and themselves and others and also to approach their representative.

f. That if the preliminary list of constituencies of the above said District are not set-aside modified and

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amended the public at locality as well as at large would suffer an irreparable loss.

g. That according to preliminary list of provincial constituencies the actual facts at grounds are not considered the District has been divided in a zigzag manner instead of smooth pattern. Without centralizing each constituency, far-flung areas have been included, instead of adjacent areas. Moreover, disturbance has been created to approach the National Highway and other communications to the local people as the people would have to travel through different areas of Tehsils to enter into different parts of same constituency. The inclusion of Kotli Murad PC, Lanjiwar PC, Pai Ahna PC in PP-256 Rahim Yar Khan-II would be suitable on account of business, social communication, to access main part of the areas and to get common facilities. In addition the approach of students to school and colleges of constituencies would same also be disturbed. Furthermore, these three Patwar Circles are required to be added in PP-256 Rahim Yar Khan-II as they same Halaa Oanoon Goi of San



- h. That the petitioner is submitting proposals after serving the ground realities and taken into consideration all the relevant factors as envisaged under Section 20 of the Election Act, 2017 and rules.
- i. That the marked map of the provincial constituencies of District Rahim Yar Khan are attached.
- j. That other grounds would be addressed with the permission of this Honourable Commission at the time of arguments.

#### **PROPOSALS**

### PP-256 Rahim Yar Khan-II

No. & Name of Constituency	Extent of the Constituency	Domition
PP-255 Rahim Yar Khan-	(c) Following OH of The inch	Population
Į.	(c) Following QH of Tehsil Liaqat Pur; i. Sidhuwali and	373987
	ii. Allah Abad	
	(d) Folliowing PCs of Khan Bala QH i. Fazil Pur	
	ii. Bakhsu Banhar	
	iii. Thul Hamza	
	iv. Unran	
	v. Jhok Gulan Shah vi. Bet Diwan and	
	vii. Banah Roya	
	c. Following PC of Tarukari QH:-	
	i. I aranda Gurgage	
	ii. Chak No.133/NP	
	iii. Chak No.137/NP and	
	iv. Ahmed Yar Of District Rahim Yar Khan	

		_	
		Following PCS:-	
		a. Arif Balocch	]
		b. Choharwala	
		c. Chak No.1/NP Additional	
		d. Chak No.001/NP; and	
		e. Ther Post	
		f. Khan Bets excluding	
		Following PCs;	
		a. Fazil Pur	
		b. Bakhsho Banhr	
		c. Thul Hamza	
		d. Unran	
·		e. Jhok Gulab Shah	
		f. Bet Diwan and	
		g. Banah Royap	
		3. Zanan Royap	1
		The following PCs of Samooka QH or	
İ		Tehsil Khanpur:-	
		i. Chaudhri	<b>j</b>
1		ii. Fateh Pur Kamal	
		iii. Ghazi Barar	
ļ		iv. Kot Shahan	
-		v. Samoka; and	
		vi. Kotli Murad PC	
		vii. Lanjiwar PC	
i		vii. Pai Ahna PC	
		viii. Wahgowan;	
		3-1-1-1	
		of District Rahim Yar Khan	
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	PF-257 Rahim Yar Khan-	c. The Following QH of Tehsil Liaqat Pur;-	250007
	III	i. 1/L Abbasia (Cholistan)	359997
Ì	İ	ii. 2/L Ababsia (Cholistan)	
1		iii. 2/R (Cholistan)	
		iv. 7/R (Cholistan)	
		v. Abbasia-I	
	·	vi. Abbasia-II	
		vii. Gulshan Farid (Cholistan):	
		viii. Haider Shah (Cholistan)	
		And	
	ł	ix. Head Farid (Cholistan)	
	*,	reduct and (Chonstan)	
}		(c) The Tarukkari QH excluding following PCs	
		i. Trinda Gurgail;	
		ii. Chak No.1333/NP	
[ 		iii. Chak No.137/NP; and	
		iv. Ahmad Yar;	ı
		d. The following PCs of Pakka Laran	
Ĺ		d. The following PCs of Pakka Laran	

wala No.1/NP Addl: No.001/NP; and Posti trict Rahim Yar Khan  pllowing QH of Tehsil Khan Pur:- khtiar Khan bbasian and Kot	357088
No.001/NP; and Posti trict Rahim Yar Khan  Pllowing QH of Tehsil Khan Pur:- khtiar Khan bbasian and Kot	357088
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llowing PCS of Bagh-o-Bahar QF il Khanpur:-	I
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ict Rahim Yar Khan.	
•	
C:	220562
narif QH	339562
OH of Tehsil Rahim Yar Khan	
ng PCc of Kot Somolo No.	
Nanim Yar Khan-	
ır Ganga	
· Qureshian	
Ourochion	
Qureshian	
ad pur Qureshian	
ad pur Qureshian	
ad pur Qureshian Abad	
ad pur Qureshian  Abad  C of Pally Shah OH of Tally	
ad pur Qureshian Abad	
1	Abad C of Pallu Shah OH of Tal "

#### PRAYER

In the light of above said submissions it is most respectfully prayed that the preliminary delimitation list of the provincial constituencies for District Rahim Yar Khan of Punjab Province be set-aside and may kindly be modified, altered and amended according to proposals of

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Any other relief which this Commission deems fit and proper may also be awarded in the interest of justice.

PETITIONER

Muhammad Asif Raees S/o Raees Rasool Bukhsh R/o Qadir Pur, P.O. Fateh Pur Kamal, Tehsil Khan Pur, District Rahim Yar Khan Cell No.0305-8282777

Through

MALIK AMIRDAD AWAN

ADVOCATE HIGH COURT Office No. 11 Muslim Block District Courts, F-8 Markaz, Islamabad. Cell No. 0333-5193409

REHMAN ALI SHEIKL

Advocate High Court Cell No.0312-4745055

Siemabad. Dated: April 3, 2018

#### BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

Muhammad Asif Raees son of Raees Rasool Bukhsh resident of Qadir Pur, P.O. Fateh Pur Kamal, Tehsil Khan Pur, District Rahim Yar Khan.

Subject: REPRESENTATION UNDER SECTION 21 OF THE ELECTION ACT, 2017.

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Muhammad\Asif Races S/o Raees Rasool Bukhsh

R/o Qadir Pur, P.O. Fateh Pur Kamal

Tehsil Khan Pur,

District Rahim Yar Khan

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