

**BEFORE THE DELIMITATION AUTHORITY, ELECTION
COMMISSION OF PAKISTAN, SEATS OF PROVINCIAL AND
NATIONAL ASSEMBLY, ISLAMABAD**

Handwritten signature and date: 23/04/2018
1-13

Ch. Mahmood Ahmad s/o Ch. Ameer Din, Caste Arain, R/O 4-Club Road, Liaquat Pur, District Rahim Yar Khan.

Cell No. **03008684466**

.....PETITIONER

VERSUS

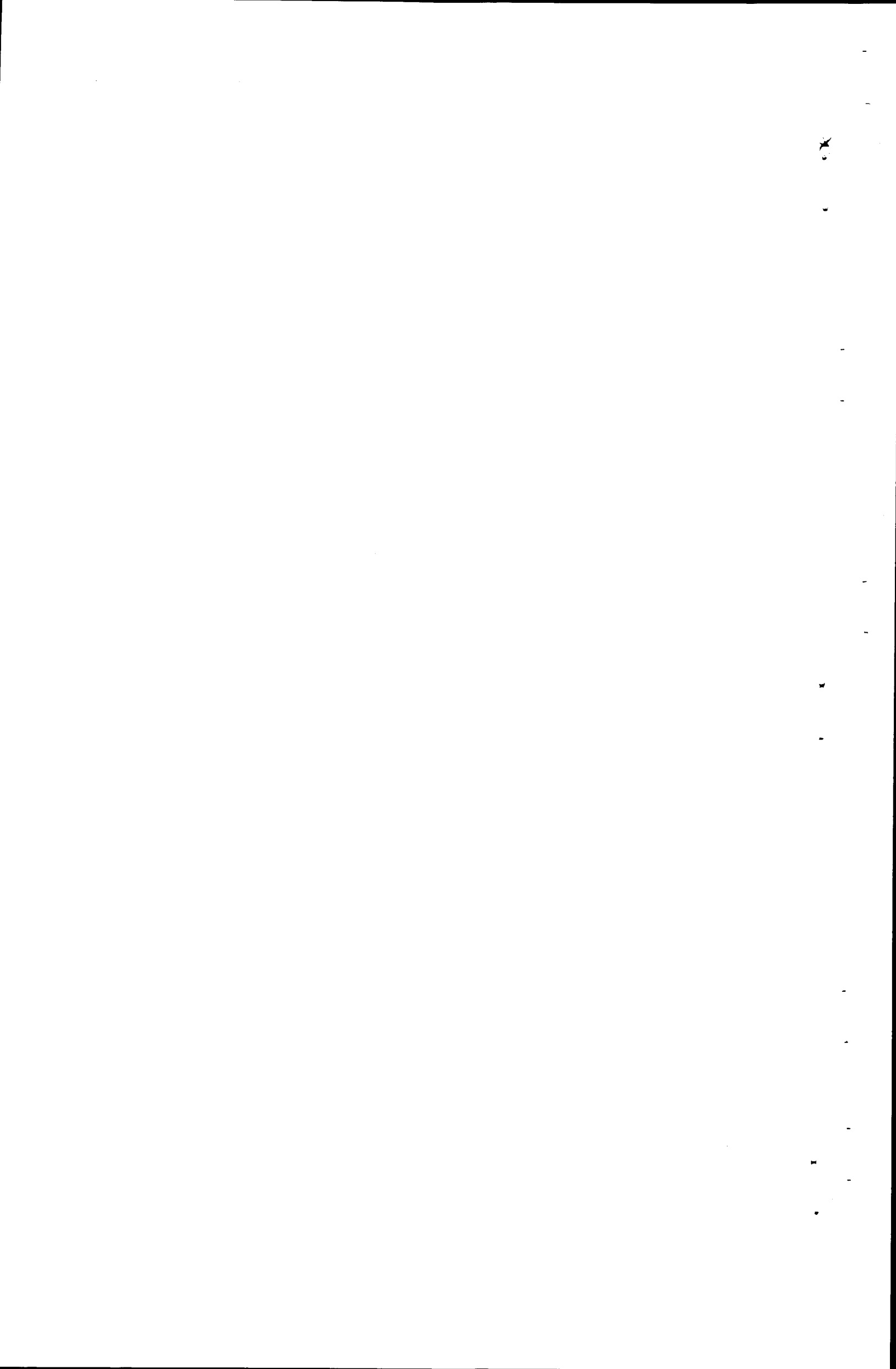
The Delimitation Committee, Election Commission of Pakistan, for Seats of Provincial and National Assembly.

.....RESPONDENT

**APPEAL AGAINST PRIMARY DELIMITATION OF PP-255, 256, 257,
258, 259 ISSUED BY THE DELIMITATION COMMITTEE FOR DISTRICT
RAHIM YAR KHAN**

Respectfully Sheweth:

1. That the addresses of the parties are correct to the best knowledge of the petitioner for all kinds of summons and notices.
2. That the petitioner is registered voter vide Serial no. 302, Census Block Code No. 250090604, Stadium Water Works Housing Scheme, Liaquat Pur and Ex-MPA of PP-287 present Constituency PP-257. Copy of voter list is attached herewith as **Annexure-A**.
3. That the Constituencies have been delimited. Moreover, the Election Commission of Pakistan has also issued instructions for delimitation of Constituency under the above enactments by the Delimitation Committee under Rule of the Election Rules, 2017. Copy of preliminary delimitation is attached as **Annexure-B**
4. That as envisaged in Section-20 of the Gazette of Pakistan, extra, October, 2, 2017, the following principle of delimitation were ignored by the said Committee, which is as follows:



9/01/04/2018

"20 Principles of delimitation.---(1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies"

5. There is ignored the principles of delimitation, for example:

i. **Distribution of population in geographically compact areas,**
(Q.H. Pakka Laran) PC Chak No. 001/NP has showed in PP-257, perhaps Chak No. 125/NP and Chak No. 126 NP of said "PC" has showed part of PP-256 in map.

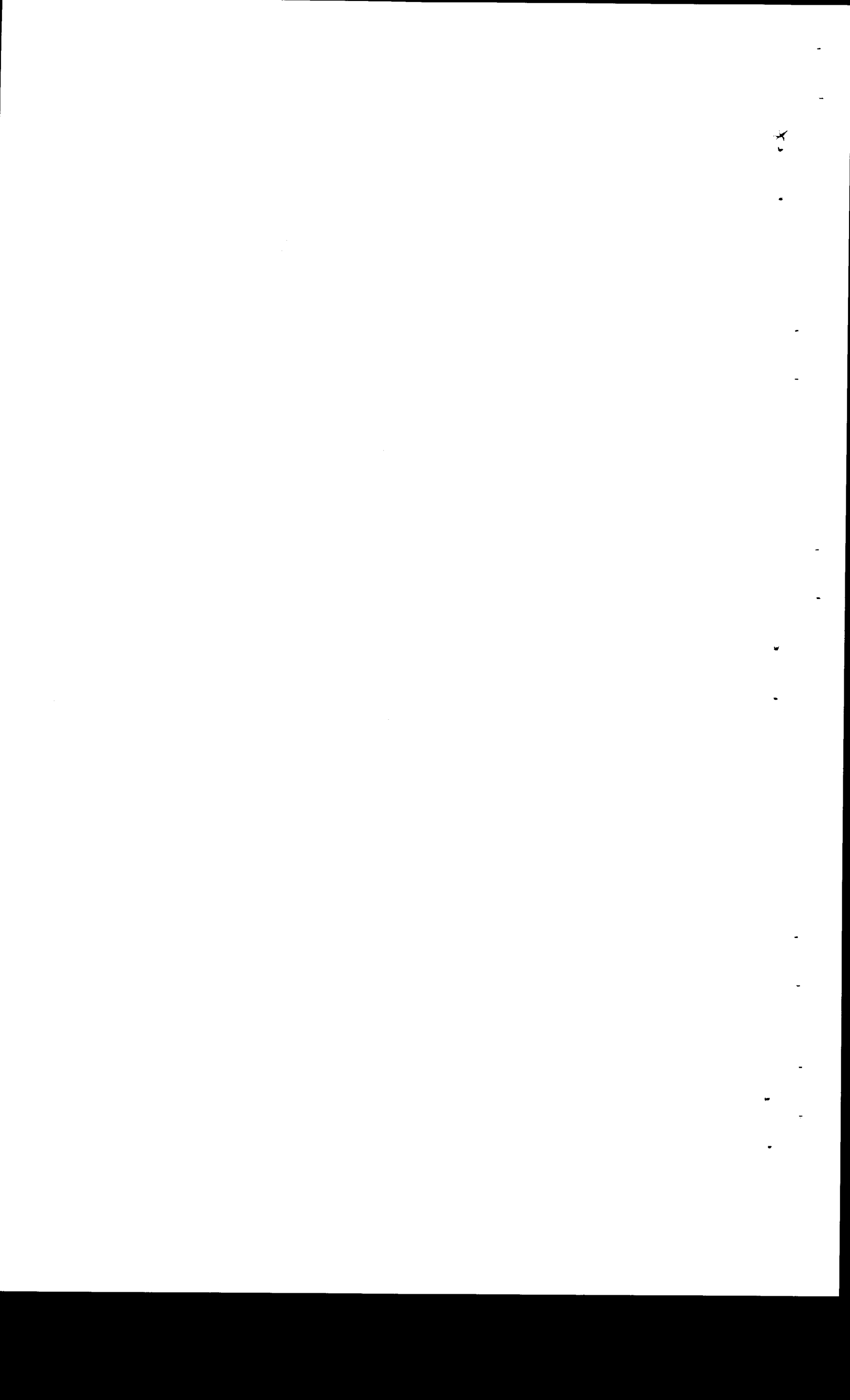
ii. **Facilities of communication**

a. (Q.H. Tarukary) PC Tarukary is Jumped from PP-257 and crossed the PC Tanwri (Q.H. Allah Abad) and PC 137/NP of PP-255.

b. (Q.H. Pakka Laran) PC Chak No. NP/Additional's chak No. 116/NP has jumped from PP-257 and crossed the PC Ashraf Shah and PC Trinda Mir Khan of PP-256.

iii. **Public Convenience**

a. The length of PP-257 is 165 Kilometers which has started from Chak No. 53/ABS (Chani Goath) N-5 and has ended to Toba Dadoo Wala and the central place of this constituency is **Feroza**, where of cholitan to east Pak-Indo Border is 131 Kilometer via Head Fareed and "T" Chaowk. Where the Cholistani Population moving during the rainy season for their cattle at Tobas etc. (Certificate of Distance issued by the "OFFICE OF THE SUB DIVISIONAL OFFICER HIGHWAY SUB DIVISION LIAQUAT PUR" is attached as Annexure "C"

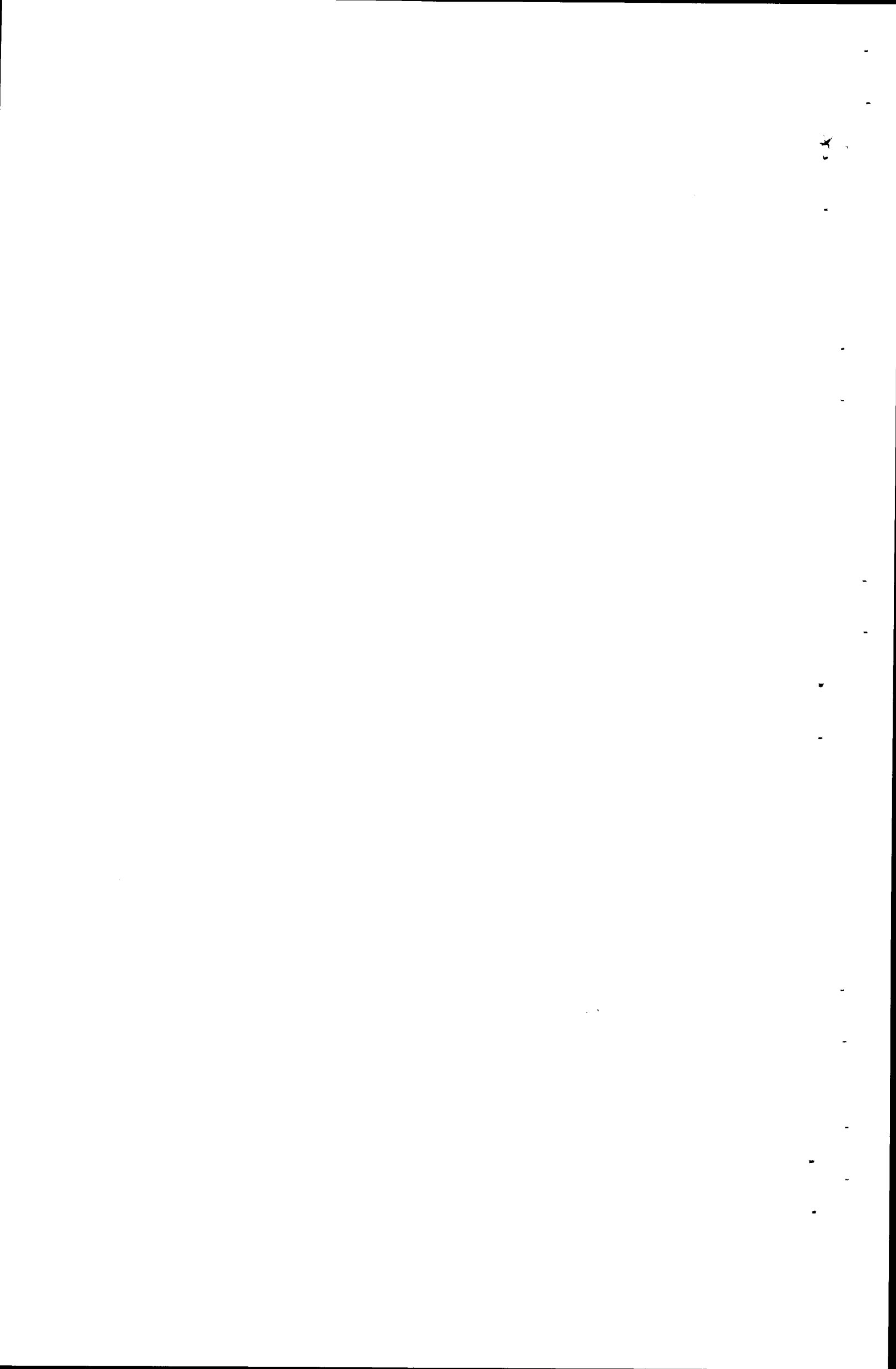


9/10/09/2018

b. PP-257 has started from the beginning boundary of Tehsil Liaquat Pur and crossed the complete boundaries of Tehsil Khan Pur and Tehsil Rahim Yar Khan and reached at the beginning boundary of Tehsil Sadiq Abad.

In these above circumstances the PP-257 has right for the concession of variation of 10% less from the quota of constituency which is declared **3,70,308** population of each constituency in this district.

6. That for the purpose of population of the Constituency within a Provincial Government, it is required to keep it uniform, however, variations upto 10% of either side so as to avoid splitting of Patwar Circle as provided in the instructions ibid is permitted.
7. That as envisaged in the instructions of Election Commission, issued for the delimitation of the Provincial and National Constituencies, the said principle has to be observed and for that very purpose, the rural population of District Rahim Yar Khan as mentioned in 2017 District Census Report of Rahim Yar Khan is **48,14,006** and the Delimitation Committee, has published the delimitation of Provincial Constituencies **13** for District Rahim Yar Khan.
8. That the present preliminary proposed list of constituency PP-257 is prepared in odd shape and distance of about **165 kilometer away**, and for completion of PCs have been mentioned in the end of Tehsil boundary, which are as follows:
 - i. PC Chohar Wala
 - ii. PC Arif Blouch
 - iii. PC Ther Posty
 - iv. PC Chak No. 01/NP
 - v. PC Chak Additional/NP



2/10/2019

The above said Patwar Circles are liable to be included in PP-256, as the same are falls under the principle of delimitation.

9. That is is pertinent to mention here that the population of nearest Patwar Circle should be included in PP-257 after exclusion from PP-255, which are as under:

- i. PC Goth Mahi (Q.H Allah Abad)
- ii. PC Talbani

10. That it is not out of record to mention here that the Patwar Circle Tarukery should be adjusted in PP-255, as the said Patwar Circle is nearest to PP-255 and border of the said Constituency, while the distance of the Patwar Circle is jumped upon the PP-257, hence cannot included in PP-257.

11. PCs

i. Pakhi War (Q.H Allah Abad) may be excluded from PP-255 and included in PP-256 for the purpose of similar population and compact block.

ii. The Following PCs from PP-256 may be excluded and included in PP-258 which was already the part of PP-258 in previous Constituency.

i. Fateh Pur Kamal

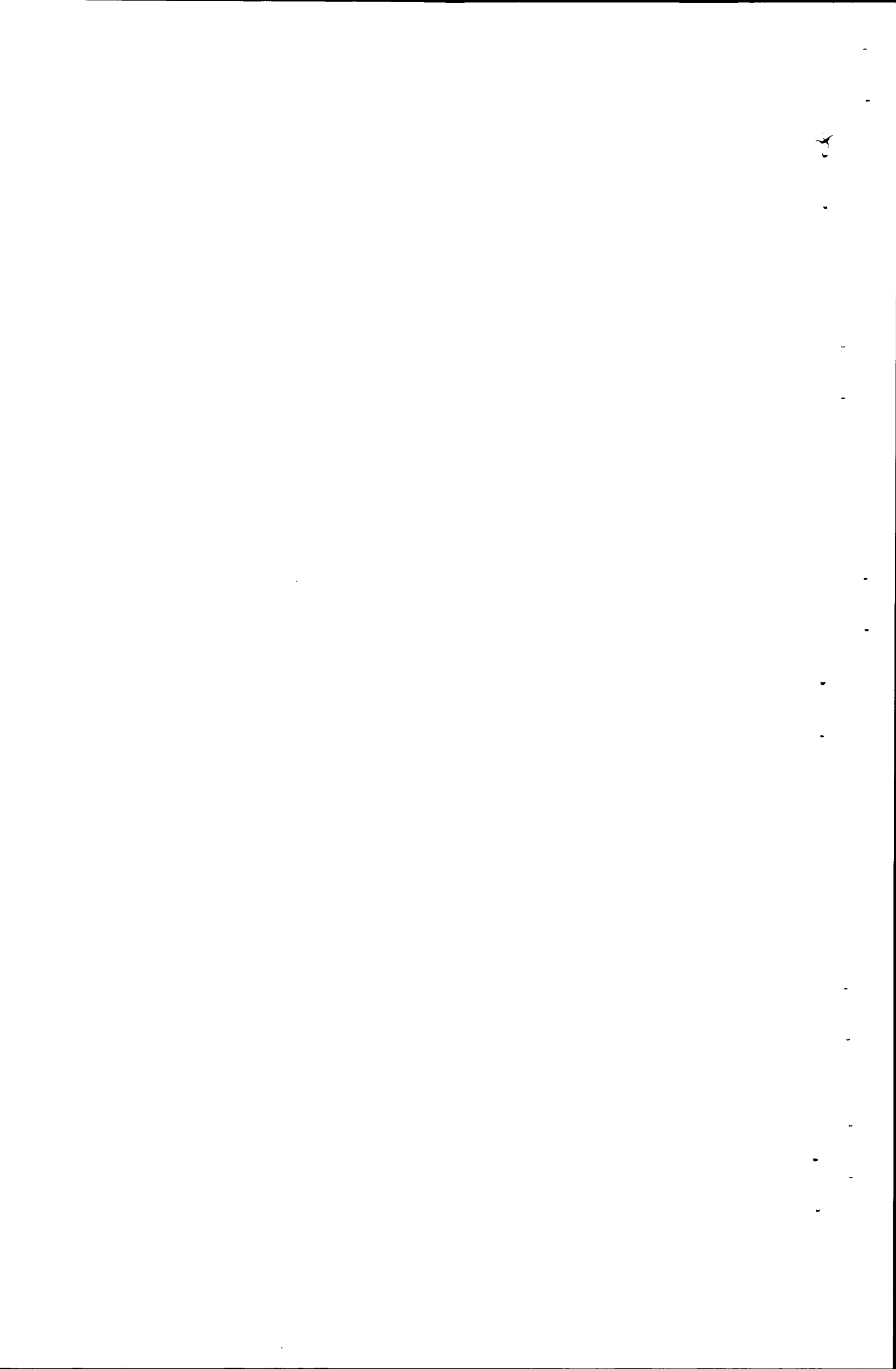
ii. Ghazi Brar

iii. And the following PCs from PP-256 may be excluded and included in PP-259 which was already the part of PP-259 in previous constituency.

i. PC Chaudhri

ii. PC Samooka

iii. PC Wahgowan



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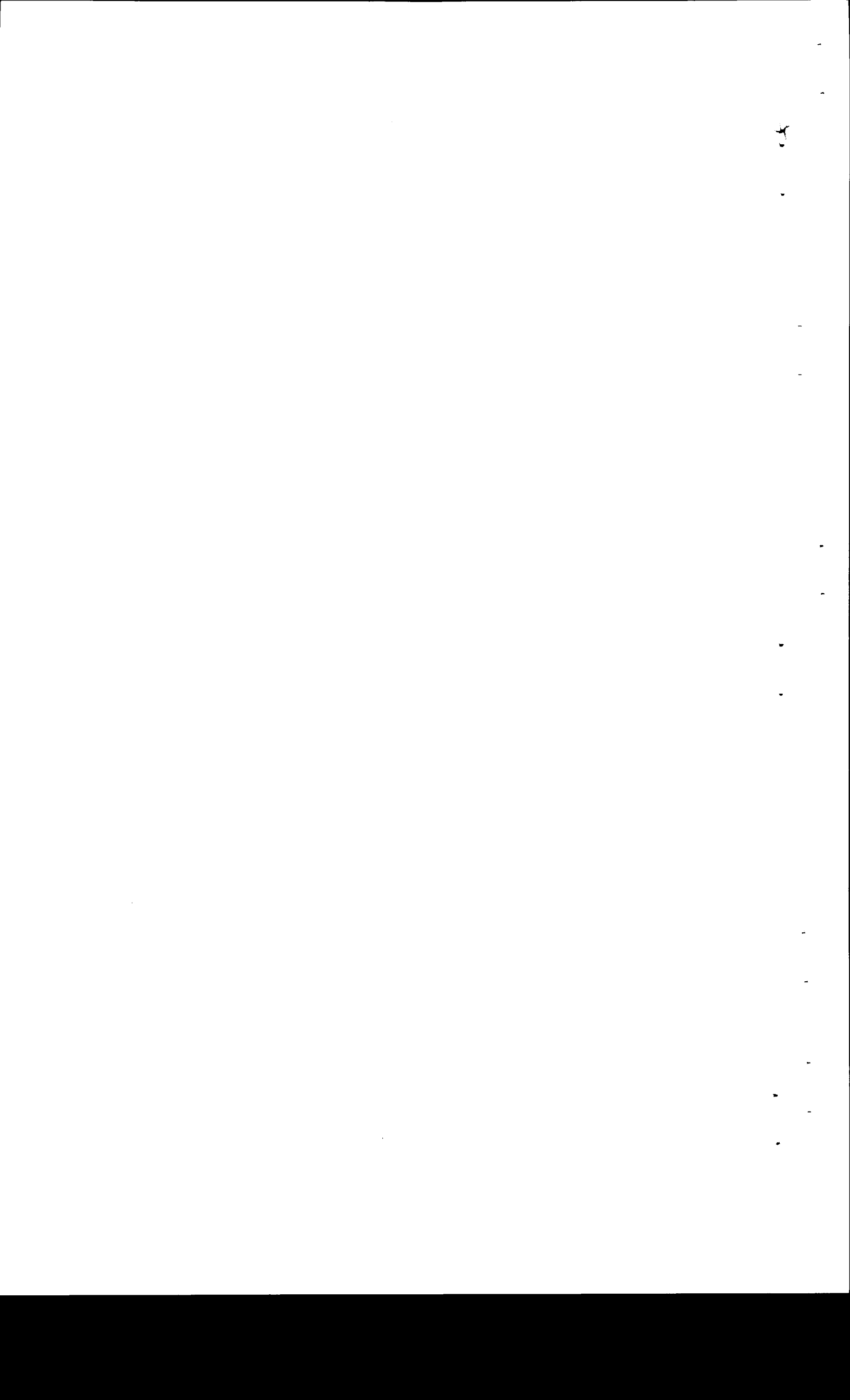
12. Now for the completion of population of PP-255, the following PCs from PP-256 may be excluded and included in PP-255 whose are compact block.

- i. PC Mud Daulat Shah
- ii. PC Duphli Kabir Khan

13. Now the population division of PP-255, 256, 257, 258, and 259 is as under:

PP-255 Rahim Yar Khan –I, The following QH of Tehsil Liaquat Pur:

- i. QH Sidhuwali
- ii. Following PCs of QH Allah Abad
 - a. PC Choudhri
 - b. PC Jan Pur
 - c. PC Malik Pur
 - d. PC Rindan
 - e. PC Tanwri
 - f. PC Wahid Bux Sial
 - g. PC Allah Abad
 - h. PC Juma Mohana
- iii. Following PCs of QH Khan Bela:
 - a. PC Bakhshoo Bhattar
 - b. PC Banah Roya
 - c. PC Bait Dewan
 - d. PC Dashti
 - e. PC Duphli Kabeer
 - f. PC Jhok Gulab Shah
 - g. PC Thul Hmza
 - h. PC Unran
 - i. PC Duphli Kabeer (excluded from PP-256)
- iv. Following PCs of QH Tarukary



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- a. PC Tarukery (excluding from PP-255)
- b. PC Chak No. 133/NP
- c. PC Chak No. 137/NP
- d. PC Ahmad Yar
- e. PC Trinda Gorgage
- v. Following PCs of QH Shedani Sharif
 - a. Mud Daulat Shah (excluded from PP-256)

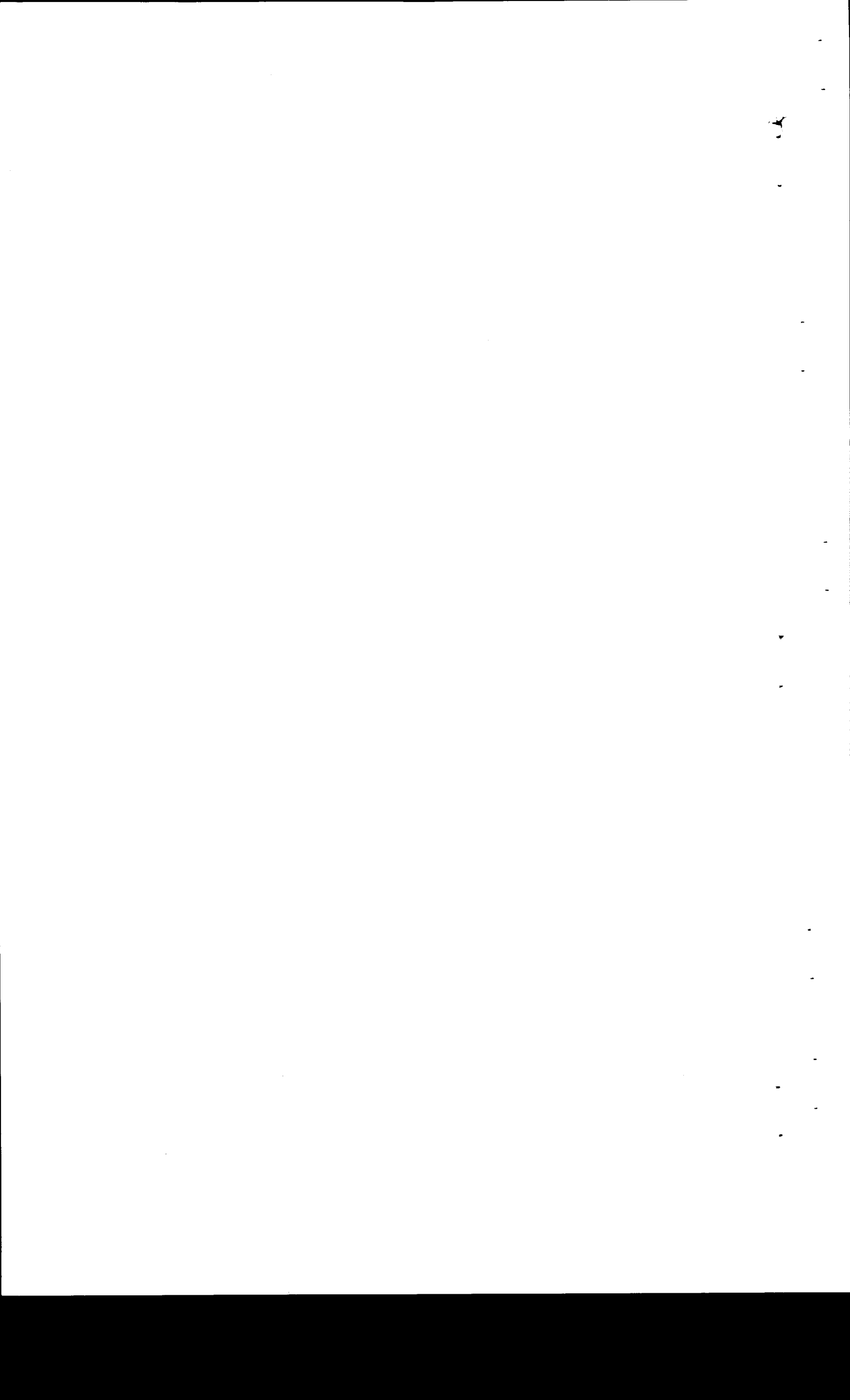
Total Population 3,63,511

PP-256 Rahim Yar Khan –II

Following QH of Tehsil Liaquat Pur:

- i. QH Paka Laran
- ii. Following PCs of QH Shedani Sharif
 - a. Ashraf Shah
 - b. Chanjni
 - c. Malkani
 - d. Shedani Sharif
 - e. Tinda Mir Khan
 - f. Zafar Abad
 - g. Gullani
 - h. Lal Shah
 - i. Ahmad Ali Lar
 - j. Kotla Mubarak
- iii. Following PCs of QH Khanbela:
 - a. Khan Bela
 - b. Qadu Wali
- iv. Following PCs of QH Allah Abad:
 - a. Pakhi War (excluded from PP-255)
- v. Following PCs of QH Samooka of Tehsil Khan Pur
 - a. Kot Shahan

Total Population: 350994



8/2/2018

PP-257 Rahim Yar Khan-III

Following QH of Tehsil Liaquat Pur:

- i. Liaquat Pur MC
- ii. Abbasia-I
- iii. Abbasia-II
- iv. Gulshan Fareed Cholistan
- v. Haidar Shah Cholistan
- vi. 1-L Abbasia (Cholistan)
- vii. 2-L Abbasia (Cholistan)
- viii. 2-R Cholistan
- ix. 7-R Cholistan
- x. Head Fareed Cholistan
- xi. The Following PCs of QH Tarukery
 - a. Chak No. 001/ABS
 - b. Chak No. 005/ABS
 - c. Chak no. 010/ABS
 - d. Chak No. 050/ABS
- xii. Following PCs of QH Allah Abad
 - a. Goath Mahi (excluded from PP-255)
 - b. Talbani (excluded from PP-255)

Total Population: **333805**

PP-258 Rahim Yar Khan-IV

Following QH of Tehsil Khan Pur

- i. QH Ghari Ikhtiar Khan
- ii. QH Jajja Abasia
- iii. QH Nawan Kot
- iv. The Following PCs of QH Bagh-o-Bahar
 - a. Dunya Pur Izafi



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- b. Dunya Pur
- c. Latki
- d. Musa Kanju
- e. Sehja
- v. The Following PCs of QH Samooka
 - e. Fateh Pur (Excluded from PP-256)
 - f. Ghazi Brar (Excluded from PP-256)

Total Population: **386052**

PP-259 Rahim Yar Khan-V

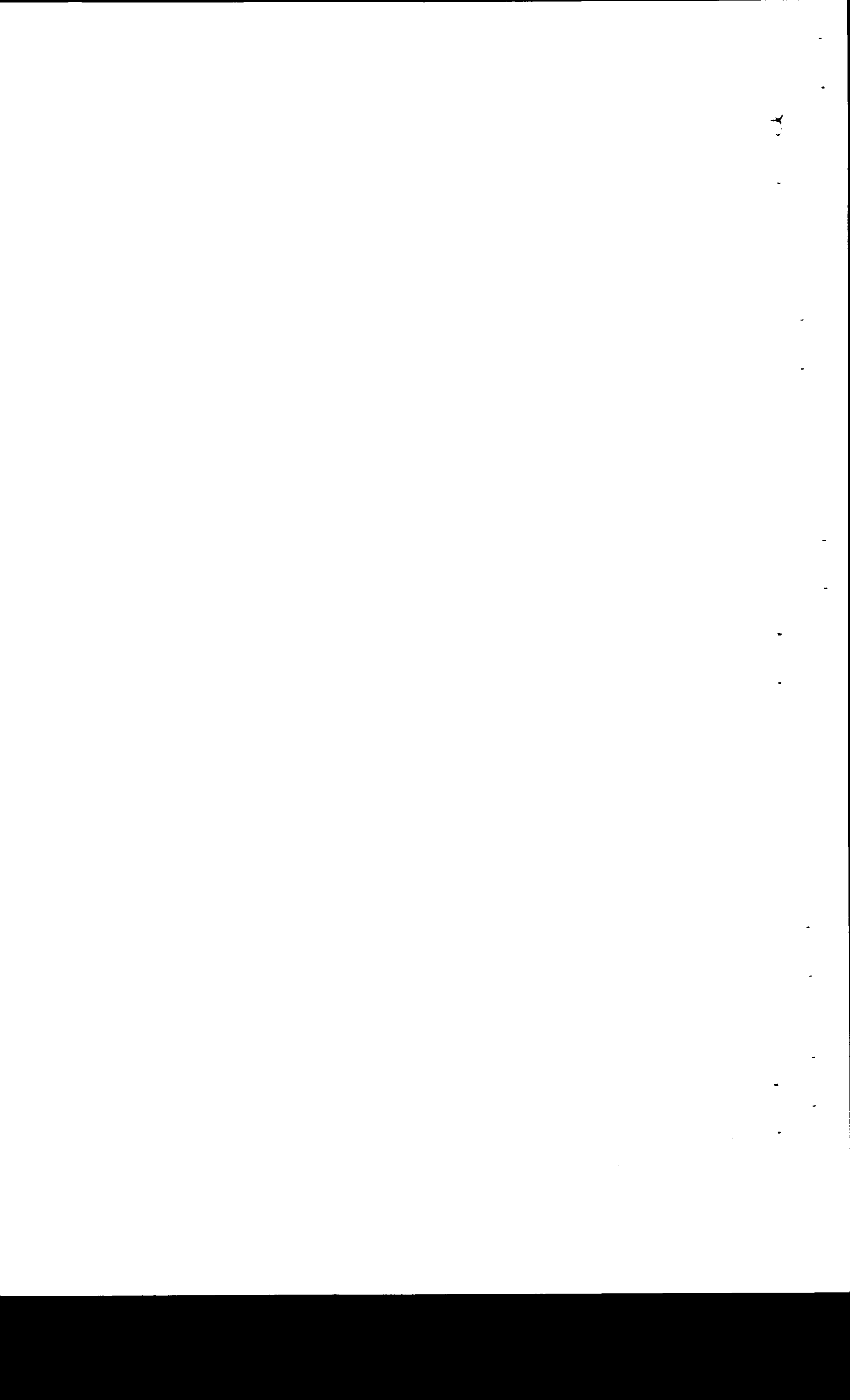
Following QH of Tehsil Khan Pur

- i. Zahir Pir MC
- ii. QH Chachran Sharif
- iii. The Following PCs of QH Samooka
 - a. Kotli Murad
 - b. Lanjiwar
 - c. Pai Ahna
 - d. PC Chaudhri (Excluded from PP-256)
 - e. PC Samooka (Excluded from PP-256)
 - f. PC Wahgowan (Excluded from PP-256)
- iv. QH Rukan Pur Of Tehsil Rahim Yar Khan
- v. Following PCs of Kot Samaba Mohal QH of Tehsil RYK
 - a. Dunya Pur Ganga
 - b. Fateh Pur Qureshian
 - c. Mianwali Qureshian
 - d. Muhammad Pur Qureshian
 - e. Sikanda Abad
- vi. Following PCs of QH Pallu Shah of Rahim Yar Khan
 - a. Rang Pur

Total Population: **382284**

PP-260 Rahim Yar Khan-VI

- a. Khan Pur MC



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b. The Following QH of Tehsil Khan Pur

- i. Bhutta Sheikhan
- ii. Khan Pur –I
- iii. Khan Pur –II of District Rahim Yar Kha

Total Population **3,62,632**

PP-261 Rahim Yar Khan-VII

- i. Kot Samaba MC
- ii. Kot Samaba Mohal QH.excluding following
PCs
 - i. Dunya Pur Ganga
 - ii. Fateh Pur Qureshian
 - iii. Mianwali Qureshian
 - iv. Muhammad Pur Qureshian
 - v. Sikandar Abad

c. The Following PCs of Tranda Sawai Khan QH of
Tehsil Rahim Yar Khan

- i. Aslam abad
- ii. Wahi Juman Shah
- iii. Bahishti
- iv. Chenah
- v. Darhi Azeem Kan
- vi. Kotla Ayoub Khan

d. Bagh-o-Bahar QH of Tehsil Khan Pur excluding
following PCs

- i. Dunya Pur Izafi
- ii. Dunya Pur
- iii. Latki
- iv. Moosa Kanju
- v. Sehja



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e. Taj Garh QH of Tehsil Rahim Yar Khan excluding following PCs

- i. Ali Pur Machian
- ii. Bahaudi Pur Machian

f. Pallu Shah QH excluding following PCs

- i. Badli Sharif
- ii. Peer Abdul Malik
- iii. Rang Pur

Total Population **3,71,634**

PP-262 Rahim Yar Khan-VIII

a. Municipal Committee Rahim Yar Khan of District Rahim Yar Khan

Total Population **4,20,419**

PP-263 Rahim Yar Khan-IX

a. Trinda Siwai Khan MC

b. The following QH of Tehsil Rahim Yar Khan

- i. Kot Samaba Abadi
- ii. Rahim Yar Khan-I
- iii. Rahim Yar Khan-II
- iv. The Following PCs of Trinda Siwai Khan QH
 - i. Amin Garh
 - ii. Sultan Pur

v. Bindour QH of District Rahim Yar Khan

Total Population **3,74,595**

PP-264 Rahim Yar Khan-X

a. Rajan Pur QH

b. The Following PCs of Pallu Shah QH

- i. Badli Sharif
- ii. Peer Abdul Malik

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c. The Following PCs of Taj Garh QH

- i. Ali Pur Machian
- ii. Bahaudi Pur Machian

d. Muhammad Pur QH of Tehsil Sadiq Abad of District Rahim Yar Khan

Total Population **3,77,785**

PP-265 Rahim Yar Khan-XI

- a. Ahmad Pur Lamah MC
- b. Ahmad Pur Lamah QH
- c. Shahbaz Pur QH excluding Qasmani PC &
- d. Bhoong QH of District Rahim Yar Khan

Total Population **3,74,514**

PP-266 Rahim Yar Khan-XII

a. The Following QH of Tehsil Sadiq Abad

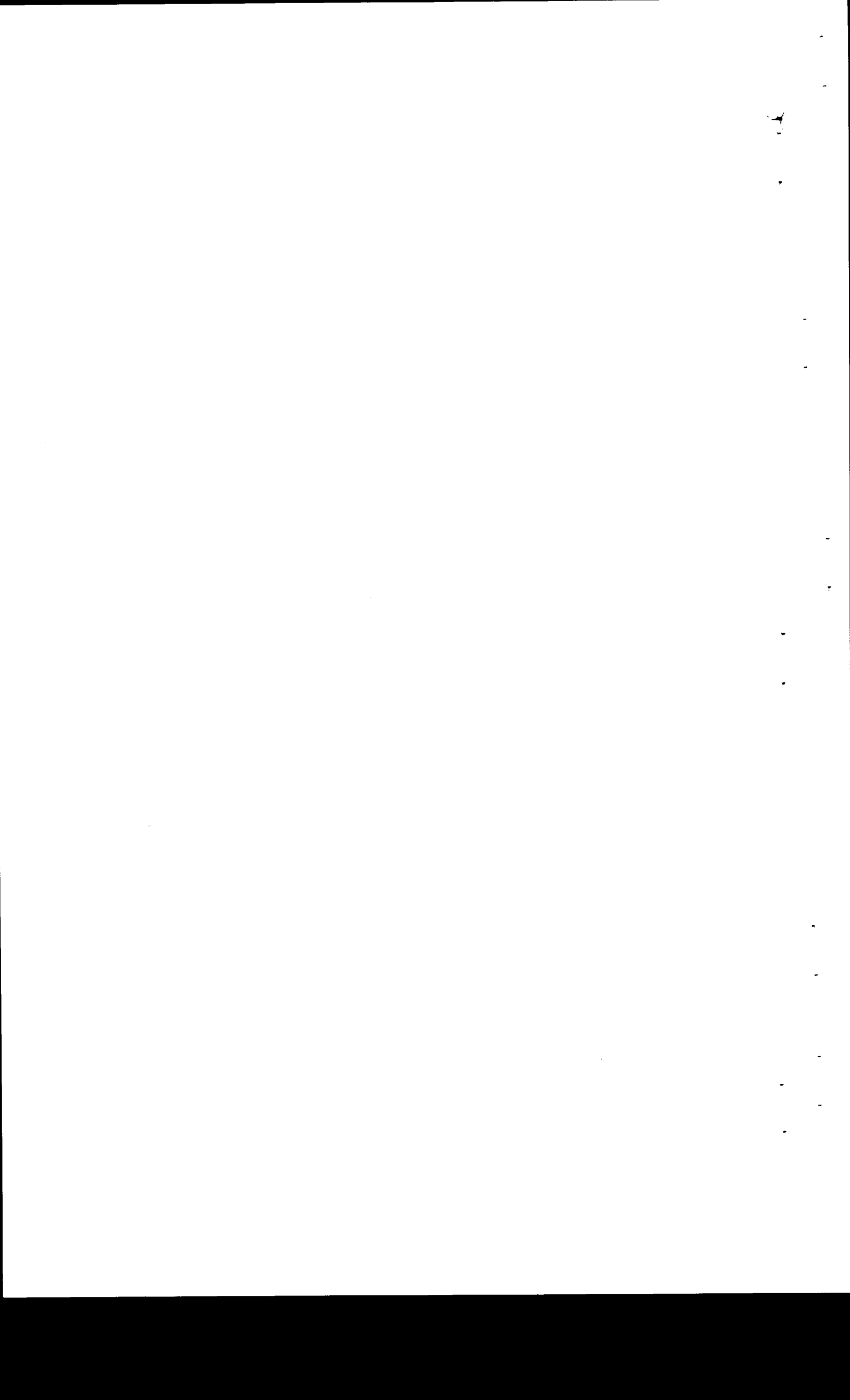
- i. Machka
- ii. Kot Sabzal
- iii. Walhar
- iv. Tillu Goth QH excluding the following PCs
 - i. Jafar Pur
 - ii. Sina Abad

b. Qasmani PC of Shahbaz Pur QH of District Rahim Yar Khan

Total Population **3,59,661**

PP-267 Rahim Yar Khan-XIII

- a. Sadiq Abad MC
- b. Sadiq Abad –I QH
- c. Sadiq Abad –II QH
- d. The following PCs of Tillu Goth QH of Tehsil Sadiq Abad



- i. Jafar Pur
 - ii. Sina abad of District Rahim Yar khan
- Total Population **3,56,141**

Copies of suggested maps and objected maps are attached herewith as Annexure-D&E.

PRAYER:

It is, therefore, humbly prayed that while accepting this petition, the impugned preliminary delimitation for PP-255, 256, 257, 258, 259 may kindly be changed as per suggestions of the appellant in the body of the appeal, in the larger interest of justice.

Dated: _____

Through:-

JAM MUHAMMAD AFZAL GASOORA

Advocate High Court
Bahawal Pur – C.C. No. 28906

APPELLANT

NOTE:

1. As per information of the petitioner, this is first petition, being filed before this Honorable Authority.

COUNSEL

