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**BEFORE THE HONOURABLE
ELECTION COMMISSION OF PAKISTAN**

**Representation With Regard To The Delimitation Of Constituencies For
The Provincial Assembly For District Of Rahim Yar Khan, Under
Subsection 3, Section 21 Of The Election Act, 2017 Read With Rule 12 Of
The Election Rules, 2017.**

Petitioner: Muhammad Naeem Akhtar

CNIC no.: 31304-2067956-9

**Resident of Dak Khana Khas Roshan Bhait, Tehsil Sadiq Abad, District
Rahim Yar Khan.**

Mobile no: 0301 867 4453

0313 660 3453

Handwritten notes: 17/4/18, 22-38, 1/1-3

The Petitioner respectfully submits;

1. That the Election Commission of Pakistan has issued Notification dated 05.03.2018, in which the list of the new delimited constituencies for the National Assembly and the Provincial Assemblies has been provided.
2. That the District of Rahim Yar Khan with a population of 48,14,006 has been allocated 6 National Assembly and 13 Provincial Assembly seats.
3. That the Petitioner is a resident of the District of Rahim Yar Khan. The delimitation of the Provincial constituencies has been done maliciously hence jeopardizing the interest of the Petitioner.
4. That the delimitation of the 13 constituencies of the Provincial Assembly from District Rahim Yar Khan is not in consonance with the provisions of The Election Act, 2017. The Delimitation Officer has proceeded with the delimitation of the constituencies for the Provincial Assembly from Rahim

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Yar Khan District in disregard of the provisions of law and cardinal principles of compactness, contiguity and equality of population.

5. That while formulating the Provincial constituencies, the principles laid down in S.20 of the Election Act, 2017 have not been followed at all. The principle of distribution of population in geographically compact areas has been blatantly disregarded and the delimitation does not appear to have been proposed by the Delimitation Officer in lawful and bona fide exercise of the powers and duties assigned to him.
6. That the Delimitation Officer has also flouted the principle, as given in the guidelines and instructions issued by the Honourable Election Commission of Pakistan, to take all possible care to keep intact the Administrative boundaries of Tehsils and Qanungo Halqas unless it is necessary to do so to remove the glaring disparity of population amongst various constituencies of the same District. Qanungo Halqas have been demolished and distributed to different constituencies to suit the interests of specific prospective candidates.
7. That the constituencies as proposed by the Election Commission of Pakistan are not geographically compact or contiguous.
8. That the Petitioner has proposed the delimitation of constituencies for the Provincial Assembly from Rahim Yar Khan District as given in **Annexure A**. The same proposals have been marked on the maps of the District Rahim Yar Khan as given in **Annexure B**. The list of constituencies as delimited by the Election Commission of Pakistan and the accompanying map are attached as **Annexures C & D**.
9. That the Petitioner has proposed changes in the following Constituencies only;
PP 264 Rahim Yar Khan X
PP265 Rahim Yar Khan XI
PP266 Rahim Yar Khan XII;
and no changes have been proposed in the remaining 10 provincial

10. The petitioner in making these proposals for the delimitation of constituencies has conformed to the provisions of The Election Act, 2017 and the Election Rules, 2017 and the guidelines and instructions issued by the Honourable Election Commission of Pakistan in the abovementioned notification. The cardinal principles of compactness, contiguity and equality of population have been obeyed. All possible care has been taken to keep the Administrative boundaries of Tehsils and Qanungo Halqas intact unless it is necessary to do so to remove the glaring disparity of population amongst various constituencies of the same District.

In view of the above it is respectfully prayed that the provincial constituencies for the District Rahim Yar Khan be kindly be ordered to be delimited as proposed by the Petitioner.


Humble Petitioner,

Muhammad Naeem Akhtar

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