

31/07/2018

-1-

BEFORE THE WORTHY SECRETARY ELECTION COMMISSION OF
PAKISTAN

Representation No. ___/2018

**REPRESENTATION UNDER SECTION 21 (2) OF THE ELECTION ACT, 2017
READ WITH RULE 12 OF THE ELECTION RULES, 2017, ON BEHALF OF
MUMTAZ ALI, REGARDING DELIMITATION OF (OLD PP-297 (NEW PP-266))**

Respectfully Sheweth;

1. That the Applicant is an Agriculturist and businessman by profession. He is resident of Old PP-297 (New PP-266). He is also involved in rendering social services to the residents of the area and carry out different philanthropic activities, as well. His voter number/Block Code No. 253100204 and Silsala No. 309 and electoral area is Dau Wala, Sadiqabad, Rahim Yar Khan.
2. That in 1998, a Census was carried out and the Delimitation of Constituencies was carried out. PP-297 was delimited at the time and the General Elections of 2002 were held. The Constituencies were delimited again in 2007 and 2013, respectively.
3. That on 15/03/2017, Pakistan Bureau of Statistics began the exercise of Census and the same was concluded on 25/05/2017. The Election Commission of Pakistan after conclusion of the Census and its publication carried out the exercise of Delimitation and redrew the boundaries of National and Provincial Assemblies in Punjab. The redrawing of boundaries and the Preliminary Report of Delimitation under **Section 21 (1) of the Election Act, 2017** was published by the Election Commission of Pakistan on 05/03/2018. On the said date the Honourable Election Commission published the preliminary report and the list of constituencies, in respect of National Assembly and Provincial Assemblies. The Honourable Election Commission in order to determine the populace for each of the constituency, has set the quota as **370, 429** persons per constituency for the province of Punjab.
4. That as a result of the Preliminary Report of Delimitation mentioned herein above, PP-297 along with other provincial constituencies has been redrawn and delimited. The new constituencies of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII) have been established, created and carved out.
5. The preliminary delimitation of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII) out of the thirteen constituencies, is as under;

PP-265 (Rahim Yar Khan-XI) (a) Ahmed Pur Lamma MC; 23499
(b) Ahmad Pur Lamma QH; 166137
(c) Shahbaz Pur QH excluding Qasmani PC;
and 81963

21/07/2019

-2-

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|---|---------------|
| (d) Bhong QH; 102915 Of district Rahim Yar Khan | |
| Total | 374514 |
| PP-266 (Rahim Yar Khan-XI---?XII) (a) The following QH of Tehsil | |
| Sadiqabad:- | |
| i. Machka; | 58382 |
| ii. Kot Sabzal; and | 117355 |
| iii. Walhar; 62587 | |
| iv. Tillu Goth QH excluding the following PCs; | 106184 |
| 1. Jaffar Pur; and | |
| 2. Sinawar; | |
| (b) Kasmani PC of Shahbazpur QH; | 15153 |
| Of district Rahim Yar Khan | |
| Total | 359661 |
| PP-267 (Rahim Yar Khan-XI---?XIII) (a) Sadiqabad MC; | 239677 |
| (b) Sadiqabad QH-I; | 47854 |
| (c) Sadiqabad QH-II; | 52955 |
| (d) The following PCs of Tillu Goth QH of Tehsil Sadiqabad:- | |
| i. Jaffar Pur; and | 7319 |
| ii. Sinawar; | 8336 |
| Of District Rahim Yar Khan | |
| Total | 356141 |

The report with regard to the District Rahim Yar Khan and the map as prepared/displayed by the Honourable Election Commission of Pakistan and Survey of Pakistan are placed as **Annexure-A** and **Annexure-B** to this Representation.

6. That the Applicant seeks kind indulgence of this Honourable Commission and prays for amendment, alteration and modification of the geographical boundaries of new constituencies of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII) inter-alia on the following;

GROUND:

- i. The Honourable Election Commission, while carrying out the exercise of Delimitation has ignored the cardinal principals, as enunciated under **Section 20 of the Election Act, 2017**.
- ii. It is pertinent to mention that the map as provided/displayed by the Honourable Election Commission and Survey of Pakistan, wrongly mentions PP-266 as PP-267. Moreover all the three constituencies **PP-265, PP-266, PP-267 are mentioned as Rahim Yar Khan-XI**, which again is typographical mistake, which requires to be rectified by this Honourable Election Commission.
- iii. Moreover, it is important to note that the Patwar Circles of Dau Wala and Ahmed Abad have been erroneously

11/31/2019

- 3 -

shown/displayed as part of PP-267 and moved from South West to North East by about 12 Kilometres in the map, inaccurately. The said error has resulted in the inclusion of Dau Wala in PP-267 rather than 266 although geographically it is located and cognate to PP-266 and part of Qanoon Goi Bhong.

- iv. The physical features and existing boundaries of the administrative units have also been ignored by the Election Commission, while carrying out the exercise of Delimitation with regard to PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII).
- v. The new constituencies of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII), as proposed in the Preliminary Report of Delimitation dated 05/04/2018, are also in negation and contradiction of the other cognate factors and homogeneity of the areas included in the said constituencies.
- vi. The Administrative Boundaries of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII), as they will have difficulty as facilities of communication and public convenience have been jumbled up in different constituencies.
- vii. The Patwar Circles of Dau Wala, Noor Ahmed Abad, Allah Abad, Ghazi Abad are related with the Qanoongi Halqas of Mackha and Kot Sabzal, culturally and heritage wise. Moreover, the lands owned by the residents of the aforementioned Patwar Circles are located in PP-266 (Rahim Yar Khan - XII). The Highway also passes through the said Patwar Circles and residents of PP-266 will face a lot of difficult in accessing the said Highway and reaping its rewards. The exclusion of the Highway from PP-266 militates against the principles of facilities of communication and public convenience. The Canal System is also passing through PP-266 and if the proposed delimitation remains

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-4-

intact will lead to water distribution disputes, as the homogeneity factor has altogether been ignored in the proposed delimitation.

- viii. The Patwar Circles have been divided/bifurcated in such a manner, which is not permissible under the applicable laws, rules and regulations.
- ix. The existing boundaries of the administrative units in PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII), have also been ignored by the Honourable Election Commission of Pakistan. The facilities of communication and public convenience have also been disregarded, while delimiting, delineating and drawing up the boundaries of the aforesaid constituency. The residents of the said areas will face a lot of difficulty in accessing the representative institutions of their Tehsil.
- x. The Election Commission has also not been properly apprised that Qanoongois and Patwar Circles of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII) have been arranged in such a manner that if the present arrangement of Delimitation remains intact and is not amended, altered and modified, the residents of the said constituencies will face severe difficulty to get their grievances redressed and access facilities of communication and public convenience.
- xi. The Delimitation carried out by the Election Commission also ignored the cardinal principal of geographically compact area.
- xii. The constituencies of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII) as proposed in the Preliminary Report of Delimitation dated 05/04/2018 is unbalanced, uneven and erroneous for the added reason that fundamental principal of facilitating the public at large, bringing governance to the doorstep of common people and instantaneous resolution of their issues. The present arrangement if remained intact and not amended, altered and modified by keeping in view, the

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- 5 -

geographical compact areas, existing boundaries for administrative units, facilities of communication and public convenience and last but not the least homogeneity will not only lead to inconvenience of the voters/residents but will also result in gerrymandering.

PROPOSED CONSTITUENCY

The constituencies of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII) should be amended, altered and modified as under;

| | | |
|-----------------------------------|--|-----------------|
| PP-265 (Rahim Yar Khan-XI) | (a) Ahmed Pur Lamma MC; | 23499 |
| | (b) Ahmad Pur Lamma QH; | 166137 |
| | (c) Shahbaz Pur QH excluding Qasmani PC; | 81963 |
| | and | |
| | (d) The following PCs of Bhong QH of Tehsil Sadiqabad; | |
| | PC Pir Hussain Abad | 9, 808 |
| | PC Garhi Khair Muhammad Jhak | 5, 813 |
| | PC Bhong | 23, 502 |
| | PC Rahim Abad | 14, 776 |
| | (e) PC Murad Machi (QH Tillu) | 29, 364 |
| | (f) PC Goth Jhura (QH Sadiqabad-1) | 8, 720 |
| | Of district Rahim Yar Khan | |
| | Total | 363, 582 |

| | | |
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| PP-266 (Rahim Yar Khan-XI---?XII) | (a) The following QH of Tehsil Sadiqabad:- | |
| | i. Machka; | 58382 |
| | ii. Kot Sabzal; and | 117355 |
| | iii. Walhar; | 62587 |
| | iv. Tillu Goth QH excluding the following PCs; | 56 421 |
| | 1. Jaffar Pur; | |
| | 2. Sinawar; | |
| | 3. PC Muhammad Murad Machi | |
| | 4. PC Chak No. 236/P | |
| | 5. PC Chak No. 186/P | |
| | 6. PC Chak No. 261/P | |
| | (b) Kasmani PC of Shahbazpur QH; | 15153 |
| | (c) The following PCs of Bhong QH of Tehsil Sadiqabad; | |
| | PC Dau Wala | 12895 |
| | PC Nawaz Abad | 12138 |
| | PC Allah Abad | 8 931 |
| | PC Ghazi Abad | 15052 |
| | Of district Rahim Yar Khan | |
| | Total | 358914 |

| | | |
|---|--|---------------|
| PP-267 (Rahim Yar Khan-XI---?XIII) | (a) Sadiqabad MC; | 239677 |
| | (b) Sadiqabad QH-I; | 39134 |
| | excluding | |
| | PC Goth Jhura | |
| | (c) Sadiqabad QH-II; | 52955 |
| | (d) The following PCs of Tillu Goth QH of Tehsil Sadiqabad:- | |
| | i. Jaffar Pur; and | 7319 |
| | ii. Sinawar; | 8336 |
| | iii. PC Chak No. 236/P | 4896 |
| | iv. PC Chak No. 186/P | 9281 |
| | v. PC Chak No. 261/P | 6222 |
| | Of District Rahim Yar Khan | |
| | Total | 367820 |

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The Proposal with regard to the District Rahim Yar Khan and the map as prepared/displayed by the Applicant are placed as **Annexure-C** and **Annexure-D** to this Representation.

It is pertinent to mention that the proposals for amendment, alteration and modification of the geographical boundaries of new constituencies of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII), are also in compliance and consonance with the quota of **370, 429** persons per constituency for the province of Punjab, as determined by the honourable Election Commission of Pakistan.

| S. No. | Constituency | Population |
|--------|------------------------------|------------|
| 1. | PP-265 (Rahim Yar Khan-XI) | 363, 582 |
| 2. | PP-266 (Rahim Yar Khan-XII) | 374417 |
| 3. | PP-267 (Rahim Yar Khan-XIII) | 361, 021 |

7. That the residents of the constituencies PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII) are entitled to proper representation in the Punjab Assembly by adhering to the principals stipulated in the **Section 20 of the Election Act, 2017**.
8. That the residents/voters of the area are also apprehensive of the proposed constituencies of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII), as they will suffer as result of the same and the issues/difficulties being faced by them will increase and remain unattended. They will virtually be unrepresented in the Punjab Assembly.

PRAYER

IT IS, THEREFORE, MOST RESPECTFULLY prayed that the Honourable Commission may very graciously be pleased to accept the Representation and amend, alter and modify the constituencies of PP-265 (Rahim Yar Khan-XI), PP-266 (Rahim Yar Khan-XII), PP-267 (Rahim Yar Khan-XIII), as per the spirit of the **Section 20 of the Election Act, 2017**.

Applicant (Mumtaz Ali)
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Through Counsel

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