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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 NOOR AHMED, 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. 253100409 and Silsala No. 481 and electoral area is Noor Pur, 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; 81963	and
	(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;	
	1. Jaffar Pur; and	106184

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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	47854
(b) Sadiqabad QH-I;		52955
(c) Sadiqabad QH-II;		
(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/proposal 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. 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).
- iii. 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.
- iv. The Patwar Circles have been divided/bifurcated in such a manner, which is not permissible under the applicable laws, rules and regulations.
- v. The Delimitation carried out by the Election Commission also ignored the cardinal principal of geographically compact area.
- vi. 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

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typographical mistake, which requires to be rectified by this Honourable Election Commission.

- vii. Moreover, it is important to note that the Patwar Circles of Dau Wala and Ahmed Abad have been erroneously shown/displayed as part of PP-267 and moved from South West to North East by about 12 Kilometers 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.
- viii. 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.
- ix. The Patwar Circles of Dau Wala, Noor Ahmed Abad, Allah Abad, Ghazi Abad are related with the Qanoongoi 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 intact will lead to water distribution disputes, as the homogeneity factor has altogether been ignored in the proposed delimitation.
- x. 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.

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- xi. 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.

PROPOSED CONSTITUENCIES

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;	and 81963
	(d) The following PCs of Bhong QH of Tehsil Sadiqabad;	
	PC Allah Abad	8931
	PC Garhi Khair Muhammad Jhak	5, 813
	PC Bhong	23, 502
	PC Rahim Abad	14, 776
	PC Goth Jhura (Sadiqabad QH-I)	8720
	(e) PC Murad Machi (QH Tillu)	29, 364
	Of district Rahim Yar Khan	
	Total	362, 705
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 Pir Hussain Abad	9, 808
	PC Ghazi Abad	15052
	Of district Rahim Yar Khan	
	Total	359791
PP-267 (Rahim Yar Khan-XI----?XIII)	(a) Sadiqabad MC;	239677
	(b) Sadiqabad QH-I;	39134
	(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

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Of District Rahim Yar Khan
Total

367820

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**.

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Applicant (Noor Ahmed)
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Through Counsel

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Rao Muhammad Akram *Khullam*
Advocate High Court

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Shafique Sultan
Advocate