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**BEFORE THE ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD**

SARDAR SHER ALI GORCHANI
Son of Sardar Pervaiz Iqbal Khan Gorchani
Resident of Deputy Speaker House, 2 Upper Mall Lahore.

1/11/18
01-04-18

REPRESENTATION

**UNDER SECTION 21(3) ELECTIONS ACT 2017 READ WITH
RULE 12 OF ELECTION RULES 2017 REGARDING
ALTERATIONS OR MODIFICATIONS IN THE
PRELIMINARY LIST OF CONSTITUENCY PP 294
RAJANPUR II**

Respectfully Sheweth,

1. That the petitioner is registered as voter of Union Council Tribal Area Tuman Gorchani, Tehsil Jampur District Rajanpur, **Annex-A** and Member of Provincial Assembly PP-294 formerly PP-248. As per notification No.F8(3)/2018-Elc-I dated 5th March, 2018, certain changes have been brought in the delimitation process effecting the boundaries of the same constituency in preliminary report of the list of constituencies of Provincial and National Assembly.
2. That the petitioner is aggrieved by the new delimitation and seeks proposed delimitation in PP-294 and PP-295 of Rajan Pur District under following amongst the other.

GROUNDS

- i) That the new delimitation as published in preliminary report and preliminary list is against the provisions of section 20 of the Election Act, 2017 read with rule 10 and 12 of the Election Rules 2017.
- ii) That the Election Commission has delimited PP-294 by keeping three Patwar circles in same constituency and adjusted five Patwar Circles in

PP-295 of QH Haji Pur unnecessarily which were never been part of PP-295 without any justification.

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- iii) That the population required for the relevant population census could be retained by bringing minor changes in PP-295
- iv) That as per new delimitation the notified PP-294 is as follows.

PP-294 Rajanpur-II:

- a) The following QH of Jampur Tehsil.
 - 1) Kotla Mughlan
 - 2) Mohammad Pur
 - 3) Isran
 - 4) The following PCs of Dajal QH
 - i) Harrand
 - ii) Basti Mayo
 - iii) Tufki
 - iv) Allah Abad Gharbi
 - v) Basti Hambi
 - 5) The following PCs of Haji Pur QH
 - i) Bahar Hussain
 - ii) Drigri
 - iii) Ghulabi and
- b) QH Shum Khul Kash of de-excluded area of Rajanpur District

Population 392893

Copy of map PP-294 as delimitated and notified by the ECP is attached as Annex-B.

- v) That the area mentioned as No.5 in new delimitation Haji Pur QH has been divided in two Provincial constituencies, the area where the tribe of the applicant is settled has been majorly adjusted in PP-295 which was always part of the same since the last delimitation done in 2002. Further, it is in violation of the principles that old constituencies must not be disturbed much.

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vi) That the delimitations of both constituencies have not been done as mentioned in rule 10(5) of the Election Rules 2017 according to which the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or, as the case may be, the agency and then proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota. Hence, the requirement of law has been overlooked in the delimitation process done by the commission.

vii) It is settled law that a division should be done in the way that same should not affect the basic boundaries of the constituencies, whereas the same has been done against the procedure defined by law. The same can be attained by dividing the constituencies in rural and urban areas.

viii) That as per new delimitation structure, the distribution of population should be geographically compact area facilitating communication and road approached with the object for public convenience, whereas the same has been overlooked in the process of delimitation. Hence, a suggested proposal is forwarded for the delimitation of PP-294 Rajan Pur II, keeping in view the requirements of the law.

The proposed PP-294 is as follows

PP-294 Rajanpur-II

- a) the following QH of Jampur Tehsil
- 1) Kotla Mughlan excluding PC Rustam Laghari
 - 2) Muhammad Pur excluding the following Patwar Circles:
 - i) Bulewala,
 - ii) Chak korraywala,
 - iii) Hairo,
 - iv) Dora Rindhan,

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- v) Muhammad Pur No. 1
 - vi) Rakh Noor Pur
- 3) The following PCs of Dajal (including)
- i) Harrand
 - ii) Basti Mayo
 - iii) Tufki
 - iv) Allah Abad Gharbi
 - v) Basti Hambli
- 4) Isran
- 5) Haji pur
- b) QH Shamu Khulchas of de-excluded area of Rajanpur District.

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Population 386159

The proposed area of
PP-295 Rajanpur-III

1. Only Patwar Circle Rustam Leghari of QH Kotla Mughlan of Tehsil Jampur
2. The following PCs of QH Muhammad Pur of Tehsil Jampur
 - i) Bulewala,
 - ii) Chak korraywala,
 - iii) Hairo,
 - iv) Dora Rindhan,
 - v) Muhammad Pur No. 1
 - vi) Rakh Noor Pur
3. The following QH of Tehsil Rajanpur
 - i) Fazilpur
 - ii) Fazilpur Colony
 - iii) Kotla Eisan
4. Fazilpur MC of Tehsil Rajanpur


Population 386968

That by adding entire Haji Pur QH which was already part of PP-294(PP-248), the population census can be maintained by keeping the same area in the said constituency which population would be 91516 and it would be complete population block whereas by adjusting areas PC Rustam Laghari of QH Kotla Mughlan and some PCs of QH Mohammad Pur. The population requirement of the same could be attained by adjusting the areas fulfilling the requirement of law.

Copy of the proposed map of PP-294, highlighted in green colour, is attached as **Annex-C.**

In view of the above submissions, it is respectfully prayed that proposed alteration may kindly be accepted and NA-193 boundaries may kindly be adjusted as requested in **para vii** of the representation.

Any other relief which deems appropriate may also be granted to the petitioner in the interest of justice.


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