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**BEFORE THE SECRETARY ELECTON COMMISSION OF
PAKISTAN**

**REPRESENTATION UNDER CHAPTER 3 RULE 12 SUB
RULE 4 OF THE ELECTION RULES 2017 REGARDING
PP-65 and PP-66.**

That the petitioner is voter member of District Mandi Bahaudin and the following facts and grounds were overlooked / not considered by this commission while preliminary list of constituencies was published under Rule 11 (2) of Election Rules 2017 for the proposed de-limitation of the above mentioned constituencies.

FACTS:

1. As per the proposed draft prepared by the de-limitation committee on form 5 and published by this commission under Rule 11(2) of Election Rules 2017, **PP-65** is comprised of the following Revenue Areas:
 - (a) MC Mandi Bahauddin;
 - (b) The following QHs of Mandu Bahauddin Tehsil
 1. M.B Din;
 - (c) Chelianwali QH excluding the following PCs
 1. Rakh Meenar Garh
 2. Siwia
 3. Dhok Nawan Lok
 4. Marala
 5. Dhok Kasib and
 - (d) Mangat TC(old)
 - (e) The following PCs of Sohawa QH
 1. Sohawa Bolani and
 2. Sohawa JamlaniOf Mandu Bahaudin District

Total Population: 407,502

2. As per the proposed draft prepared by the de-limitation committee on form 5 and published by this commission under Rule 11(2) of Election Rules 2017, **PP-66** is comprised of the following:
 - (a) Phalia Tehsil excluding the following QHs:

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1. Qadirabad and
 2. Bherowal
 3. Qadirabad TC(old)
- (b) The following PCs of Chelianwali QH:
1. Rakh Meenar Garh
 2. Siwia
 3. Dhok Nawan Lok
 4. Marala
 5. Dhok Kasib;
- Of Mandi Bahaudin District

Total Population: 396,510

3. That petitioner submits memorandum of representation inter alia on the following:

GROUNDS

The following relevant factors and circumstances were overlooked, which are necessary for the welfare and well-being of the people of the constituencies, as well as fair play.

- (a) That the people of the constituency are living in village since ages. They share common value system and customs. Their combined intellect is an extract of the community based living structure. In particular, the population of village living in the districts of Mandu Bahaudin hailing from the common tribes has been divided into different constituencies in the name of de-limitation process.
- (b) That as per section 20 (1), all constituencies for general seats shall, as far as practicable be delimited having regard to the distribution of population in geographically compact areas. In terms of newly created constituencies, geographic hurdles shall hinder the smooth living of the local people and conduct of fair polls.
- (c) That as per the section 20 (3) of Election Act 2017, the variation in population of constituencies of an assembly, or local government shall not ordinarily exceed 10%.
- (d) That as per section 20 (1), all constituencies for general seats shall, as far as practicable be delimited having regard to existing boundaries of administrative units. The newly constituted constituencies shall adversely affect the

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functioning of administrative departments, causing inconvenience to the voters.

- (e) That as per section 20 (1), all constituencies for general seats shall, as far as practicable be delimited having regard to facilities of communication, public convenience, and other cognate factors. In case of implementation of newly proposed constituencies optimum utilization of communication facilities cannot be achieved.
- (f) That the proposal prepared by the petitioner makes sure that the area remains geographically compact. Furthermore, the proposal does not affect the existing boundaries of the administrative units.
- (g) That principal as laid down in section 20 of the election act 2017 has been violated while notifying the preliminary delamination. The violation is now not sustainable.
- (h) That reason to make constituency would be the harmony between the local population and their convenience which principle has been violated while notifying the preliminary constituency, hence required being correct.
- (i) That the petitioner proposes the following scheme which shall fulfill the criteria as laid, down in section 20(1) of the Election Act 2017.

Petitioner's Proposal:

Following QHs may be combined together to form **PP-65:**

- (a) MC Mandi Bahauddin;
- (b) The following QHs of Mandi Bahauddin Tehsil
 - 1. M.B Din;
- (c) Chelianwali QH including the following PCs
 - 1. Rakh Meenar Garh
 - 2. Siwia
- (d) The following PCs of Sohawa QH
 - 1. Sohawa Bolani and
 - 2. Sohawa Jamlani

Of Mandu Bahaudin District

Total Population: 408,101

Following QHs may be combined together to form **PP-66:**

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(a) Phalia Tehsil excluding the following QHs:

1. Qadirabad and
2. Bherowal
3. Qadirabad TC(old)

(b) The following PCs of Chelianwali QH:

1. Dhok Nawan Lok
 2. Marala
 3. Dhok Kasib;
- Of Mandi Bahaudin District

(c) Mangat TC (old)

Total Population: 395,911

Detailed arguments/maps/facts shall also be placed before this honorable commission.

PRAYER:

It is therefore, respectfully prayed that the proposal based upon amendments/alteration and modification submitted by the petitioner in the body of the petition may kindly be declared as the area of the constituencies of PP-65 and PP-66, in the interest of justice.


Petitioner

Tajamul Hussain S/o Muhammad Hussain

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Tehsil & District Mandi Bahaudin

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Through


Rai Tajamal Hussain
Advocate High Court