

-2-

W

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

Liaquat Ali Ranjha son of Chaudhary Lal Khan, Caste Ranjha, resident of Village Chhani Ghana, P.O Same, Tehsil Phalia, District Mandi Bahauddin. CNIC No.34403-0791009-5, Cell No.0300-7566142.

.....Petitioner

**REPRESENTATION/OBJECTION AGAINST THE
PRELIMINARY DELIMITATION / DRAFT REGARDING
THE PROVINCIAL CONSTITUENCIES PP-67, PP-68
DISTRICT MANDI BHAUDDIN FOR EXCLUSION OF
PATWAR CIRCLE RUKAN FROM PP-68 MANDI
BHAUDDIN AND TO BE INCLUDED IN PP-67 MANDI
BHAUDDIN AS WELL AS PATWAR CIRCLE PANDOWAL
BALA, PATWAR CIRCLE PAIN AND PATWAR CIRCLE
NAIN TO BE EXCLUDED FROM PP-67 DISTRICT MANDI
BHAUDDIN AND TO BE INCLUDED IN PP-68 MANDI
BHAUDDIN**

Respectfully Sheweth:

1. That the petitioner is resident of above said address and also residing in constituency PP-68 Mandi Bahauddin, ID Card and certificate of voter member of constituency PP-68 Mandi Bahauddin are attached herewith as **Annex-A & A1**.
2. That the preliminary delamination/draft regarding the provincial constituencies of District Mandi

1870
1871
1872
1873
1874
1875
1876
1877
1878
1879
1880
1881
1882
1883
1884
1885
1886
1887
1888
1889
1890
1891
1892
1893
1894
1895
1896
1897
1898
1899
1900
1901
1902
1903
1904
1905
1906
1907
1908
1909
1910
1911
1912
1913
1914
1915
1916
1917
1918
1919
1920
1921
1922
1923
1924
1925
1926
1927
1928
1929
1930
1931
1932
1933
1934
1935
1936
1937
1938
1939
1940
1941
1942
1943
1944
1945
1946
1947
1948
1949
1950
1951
1952
1953
1954
1955
1956
1957
1958
1959
1960
1961
1962
1963
1964
1965
1966
1967
1968
1969
1970
1971
1972
1973
1974
1975
1976
1977
1978
1979
1980
1981
1982
1983
1984
1985
1986
1987
1988
1989
1990
1991
1992
1993
1994
1995
1996
1997
1998
1999
2000
2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
2023
2024
2025

1870
1871
1872
1873
1874
1875
1876
1877
1878
1879
1880
1881
1882
1883
1884
1885
1886
1887
1888
1889
1890
1891
1892
1893
1894
1895
1896
1897
1898
1899
1900
1901
1902
1903
1904
1905
1906
1907
1908
1909
1910
1911
1912
1913
1914
1915
1916
1917
1918
1919
1920
1921
1922
1923
1924
1925
1926
1927
1928
1929
1930
1931
1932
1933
1934
1935
1936
1937
1938
1939
1940
1941
1942
1943
1944
1945
1946
1947
1948
1949
1950
1951
1952
1953
1954
1955
1956
1957
1958
1959
1960
1961
1962
1963
1964
1965
1966
1967
1968
1969
1970
1971
1972
1973
1974
1975
1976
1977
1978
1979
1980
1981
1982
1983
1984
1985
1986
1987
1988
1989
1990
1991
1992
1993
1994
1995
1996
1997
1998
1999
2000
2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
2023
2024
2025

3-

g

Bahauddin i.e. PP-67 & PP-68 Mandi Bahauddin is against the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017.

3. That as per the preliminary delimitation regarding the provincial constituencies District Mandi Bahauddin in which PATWAR CIRCLE Rukan has been included in PP-68 Mandi Bahauddin, whereas PATWAR CIRCLE Pandowal Bala, PATWAR CIRCLE Pain and PATWAR CIRCLE Nain have been included in PP-67 District Mandi Bahauddin against the laws, rules, provisions, sections laid down in The Delimitation Rules, 2017.
4. That the present formulation/preliminary delimitation draft is totally against the existing boundaries compactness of areas, common sources of communication, infrastructures and public convenience, which are the basic and fundamental rules and guidelines for the purpose of delimitation.

40

✓

5. That Election Commission of Pakistan has negated ignored and deviated as well as violated the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017, which is totally contradictory and opposite to the prescribed formula, laws, rules and provisions, so is liable to be modified, rectified and revised.
6. That QHs Rukan is very closed nearest and adjacent being part and partial of PP-67 District Mandi Bahauddin, whereas PATWAR CIRCLE Pandowal Bala, PATWAR CIRCLE Pain and PATWAR CIRCLE Nain are very closed nearest and adjacent as well as part and partial of PP-68 District Mandi Bahauddin which is liable to be rectified, modified and revised.
7. That the preliminary draft/delimitation is liable to be modified, rectified and revised upon the following grounds:

5 -

h

GROUNDS:

- a. That Patwar Circle Rukan is very close and near to Tehsil Head quarter Malakwal and is situated at a distance of only Eleven (11) Kilometers from Tehsil Head Quarters Malakwal, which is the head of PP-67.

- b. That QH Qadir Abad at a distance of 35/40 Kilometer at the bank of river Chenab, whereas PATWAR CIRCLE Rukan is situated at a distance of 15 Kilometer from river Jhelum so it is unnatural to include the PATWAR CIRCLE Rukan into PP-68 Mandi Bahauddin whereas its comfortable and feasible to be included in PP-67 Mandi Bahauddin in all respective of compactness of areas, parity of population, existing boundaries, infrastructure, common sources of communication and particularly public convenience in the interest of public.

e f e

g

c. That PATWAR CIRCLE Rukan is situated at the double road/one way/dual carriage way road from Sargodha to Gujrat and total population of the PATWAR CIRCLE Rukan is situated to the northern side of the road so it is comfortable, feasible keeping in view and mind the compactness of areas, existing boundaries, common sources of communication, infrastructure and public convenience with its inclusion into PP-67 District Mandi Bahauddin, so is liable to be excluded from PP-68 Mandi Bahauddin and to be included in PP-67 Mandi Bahauddin.

d. That PATWAR CIRCLE Pandowal Bala, PATWAR CIRCLE Pain and PATWAR CIRCLE Nain are very close, nearest, adjacent and part and partial of PP-68 District Mandi Bahauddin so is liable to be excluded from PP-67 Mandi Bahauddin and to be included PP-68 Mandi Bahauddin.

e. That the population of PATWAR CIRCLE Rukan is 21,361 and PATWAR CIRCLE Pandowal Bala,

7 - *lv*

PATWAR CIRCLE Pain and PATWAR CIRCLE Nain is 23,166 so with the exclusion of PATWAR CIRCLE Rukan from PP-68 Mandi Bahauddin and its inclusion into PP-67 Mandi Bahauddin as well as the exclusion of PATWAR CIRCLE Pandowal from PP-67 District Mandi Bahauddin and to be included in PP-68 District Mandi Bahauddin both the constituencies become very ideal in all respective of parity of population, compactness of areas, existing boundaries, common sources of communication and in the interest of public convenience.

- f. That the present preliminary delimitation/draft is gross violation of fundamental rules, principles, provisions and sections laid down as the areas containing to each and every constituency or not into compact blocks of population in connection with common source[?] of communication, infrastructure, existence of boundaries and public convenience, whereas with the exclusion of PATWAR CIRCLE Rukan from provincial constituency number PP-68 district Mandi

8

✓

Bahauddin and its inclusion into provincial constituency number PP-67 District Mandi Bahauddin as well as the exclusion of PATWAR CIRCLE Pandowal Bala, PATWAR CIRCLE Pain and PATWAR CIRCLE Nain from provincial constituency number PP-67 district Mandi Bahauddin and its inclusion into provincial constituency number PP-68 District Mandi Bahauddin that becomes an ideal delimitation.

- g. That the preliminary delimitation/draft is liable to be modified, rectified and revised as there is no parity of population, compactness of areas with existing boundaries, common source of communication, infrastructure and public convenience and it can be perused in the preliminary delimitation/draft.
- h. That the proposal of the petitioner given below is in accordance with the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017 keeping in mind

g e

✓

and view all the fundamental rules and principles of compactness of areas existing boundaries, sources of communication and in the interest of public convenience laid down in The Delimitation Rules and Act, 2017.

PROPOSAL:

That the area and population of PATWAR CIRCLE Rukan be excluded from provincial constituency number PP-68 District Mandi Bahauddin and to be included in PP-67 District Mandi Bahauddin as well as the area and population of PATWAR CIRCLE Pandowal be excluded from provincial constituency number PP-67 District Mandi Bahauddin and be included in provincial constituency number PP-68 District Mandi Bahauddin.

?

**PROPOSED PP-67 & PP-68 DISTRICT MANDI
BAHAUDDIN:**

i. PP-67 Mandi Bahauddin

a. Total Population	394,480
---------------------	---------

40

92

b. Exclusion of PATWAR CIRCLE Pandowal Bala,

- 23,166

c. PATWAR CIRCLE Pandowal Pain & PATWAR

CIRCLE Nain 371,314

d. Inclusion of population of PATWAR CIRCLE

Rukan +21,361

Total 392,675

ii. PP-68 Mandi Bahauddin

Total Population 394,800

Exclusion of PATWAR CIRCLE Rukan

- 21,361

373,439

Inclusion of PATWAR CIRCLE Pandowal Bala,

+ 23,166

PATWAR CIRCLE Pandowal Pain & PATWAR

CIRCLE Nain **396,605**

iii. Other remaining constituencies of District Mandi

Bahauddin are not in question.

PRAYER:


In the circumstances mentioned above, it is humbly prayed that by accepting this memorandum petition the area and

11

Population of PATWAR CIRCLE Rukan may kindly be excluded from provincial constituency number PP-68 District Mandi Bahauddin and may kindly be included in provincial constituency number PP-67 District Mandi Bahauddin as well as the population and area of PATWAR CIRCLE Pandowal Bala PATWAR CIRCLE Pandowal Pain and PATWAR CIRCLE Nain may kindly be excluded from provincial constituency number PP-67 district Mandi Bahauddin and may kindly be included in provincial constituency number PP-68 District Mandi Bahauddin.


Petitioner
Liaquat Ali Ranjha

Through


Khurram Liaquat
Advocate High Court
0322-8039072