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

Talib Hussain son of Mutali Khan, resident of Pakka Nala,
Dera Nasir, P.O Same, Region, Tehsil Malakwal, District
Mandi Bahauddin. CNIC No. 34401-0563343-7, Cell No.
0340-4910800.

.....Petitioner

**REPRESENTATION/OBJECTION PETITION AGAINST
THE PRELIMINARY DELIMITATION / DRAFT
REGARDING THE PROVINCIAL CONSTITUENCIES PP-
67, PP-68 DISTRICT MANDI BHAUDDIN FOR
EXCLUSION OF PC RUKAN FROM PP-68 MANDI
BHAUDDIN AND TO BE INCLUDED IN PP-67 MANDI
BHAUDDIN AS WELL AS EXECUTION OF PC MONA
AND PC PIND MAKO 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-67 Mandi Bahauddin, ID Card and certificate of voter member of constituency PP-68 Mandi Bahauddin is attached herewith as **Annex-A & A1.**
2. That as per the preliminary delimitation regarding the provincial constituencies District Mandi

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Bahauddin in which PC Rukan has been included in PP-67 Mandi Bahauddin, whereas PC Mona and PC Pind Mako, have been included in PP-67 District Mandi Bahauddin against the laws, rules, provisions, sections laid down in The Delimitation Rules, 2017.

3. 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.
4. That the preliminary delamination/draft regarding the provincial constituencies of District Mandi 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.
5. That Election Commission of Pakistan has negated ignored and deviated as well as violated the

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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 PC Mona and PC Pind Mako, 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:

GROUND:

- a. That PC 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

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Quarters Malakwal, which is the head of Provincial Constituency No. PP-67 District Mandi Bahaud Din.

- b. That PC Rukan is situated at the double road/one way/dual carriage way road from Sargodha to Gujrat and total population of the PC 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 Provincial PP-67 District Mandi Bahauddin.

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- c. That PC Mona and PC Pind Mako, 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.

- d. That QH Qadir Abad at a distance of 35/40 Kilometer at the bank of river Chenab, whereas PC Rukan is situated at a distance of 15 Kilometer from river Jhelum so it is unnatural to include the PC 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. That the population of PC Rukan is 21,361 and PC is 23,166 so with the exclusion of PC Rukan from PP-68 Mandi Bahauddin and its inclusion into PP-67 Mandi Bahauddin as well as the exclusion of PC Mona and PC Pind Mako, 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,

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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 PC Rukan from provincial constituency number PP-68 district Mandi Bahauddin and its inclusion into provincial constituency number PP-67 District Mandi Bahauddin as well as the exclusion of PC Mona and PC Pind Mako, 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.

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- 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 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 PC Rukan be excluded from provincial constituency number PP-68 District Mandi Bahauddin and to be included in PP-67 District Mandi

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Bahauddin as well as the area and population of PC Mona and PC Pind Mako, 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 BHAUDDIN:

i. PP-67 Mandi Bahauddin

a. Total Population	394,480
b. Exclusion of PC Mona and PC Pind Mako,,	<u>- 19,398</u>
	375,082
c. Inclusion of population of PC Rukan	<u>+21,361</u>
Total	396,443

ii. PP-68 Mandi Bahauddin

Total Population	394,800
Exclusion of PC Rukan	<u>- 21,361</u>
	373,439
Inclusion of PC Mona and PC Pind Mako,	<u>+ 19,398</u>
	392,837

iii. Other remaining constituencies of District Mandi Bahauddin are not in question.

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PRAYER:

Keeping in view of above, it is humbly prayed that by accepting this memorandum petition the area and population of PC 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 PC Mona and PC Pind Mako, 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, in the interest of justice and public convince.


Petitioner
Talib Hussain

Through


Qazi Muhammad Shafi
Advocate High Court
0300-6719704