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8/31/03/2018
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Before the Secretary, Election Commission of Pakistan,
Islamabad.

Representation U/S 21(3) Elections Act 2017 read with Rule
12 of Election Rules 2017 for alteration/ modification in
the delimitations of Constituency PP 69, Hafizabad-I.

Respectfully Sheweth:-

1. That the Election Commission of Pakistan vide
Notification No.F-8(3)/2018-Elec-I dated 08.3.2018
published in the official Gazette the Draft list of Delimited
Constituencies of National as well as Provincial
Assemblies. The Constituency PP-69, Hafizabad-I as notified
consists of the following areas:

- (a) PCs of Chak Chatha QH of Hafizabad Tehsil.
 - (i) Kot Hassan Khan
 - (ii) Wachohoki
- (b) Jalalpur Bhattian M.C.
- (c) Jalalpur Nau QH of Pindibhattian Tehsil.
- (d) Following QH of Hafizabad Tehsil.
 - (i) Soianwala
 - (ii) Vanike Tarar
 - (iii) Kolu Tarar
 - (iv) Kaleki

2. That the Constituency PP-71, Hafizabad-III was delimited and notified as follow:-

PP-71 Hafizabad-III (a) Pindi Bhattian MC, 393885
(b) Sukheki MC,
(c) The following QHs of Pindi Bhattian Tehsil
(i) Pindi Bhattian;
(ii) Kot Nakka;
(iii) Sukheki;
(iv) Kassesay;
of Hafizabad District.

3. That the petitioner is voter member of the Constituency PP 69 and being a political and social worker is very well aware of the physical typographical, geographical and territorial factors of the provincial constituencies of the District.

4. That the constituencies PP 69 & 71 have been delimited in violation of the physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors; hence the petitioner seeks/proposes following amendment/modification in the notified constituencies PP 69

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& PP 71.

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Area consisting of:

- (i) QH of Kaleki (Population 77547)
- (ii) PCs of Chak Chatha QH consisting
 - (a) Kot Hassan Khan (11792-Population)
 - (b) Wachoki (6818 Population)

be excluded from the Constituency PP 69 and included into PP 71.

Similarly Area consisting of:

- (i) QH of Kassesay (70879 Population)
- (ii) PC Jandoki of QH of Sukheki (11823-Population)
- (iii) PC (a) Shori Manika (7358 Population)
 - (b) Mirza Banghseenka (8743 Population)

of QH Kot Nakka

be included in PP 69 and excluded from PP 71, on the following amongst other:-

GROUND S

- a) That the existing delimitations of the Constituencies PP 69 and PP 71 as notified by the Election Commission are violative to the principles enshrined in the Section 20 of the Election Act 2017 and the rules 10 & 12 of the Election Rules 2017, hence, not liable to be sustained.
- b) That while delimiting the titled Constituencies the territorial units of the Constituency, Physical features

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Geographically compact area, existing boundaries of Administrative Units, facilities of communication and public convenience have not been considered which are the primary principles for delimiting the Constituencies.

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- c) That the rule 10(5) of the Election Rules 2017 categorically declares that the delimitation of any Constituency shall start from the northern end of the District and then proceed clockwise in a zigzag manner keeping in view the population of the Constituencies. The Delimitation Committee while delimiting PP 69 has categorically ignored the parameters provided by the said rule and while ignoring the territorial unity included QH of Kaleki and PCs Kot Hassan Khan and Wachhoki of QH Chak Chatha in the PP 69 which by no stretch of imagination can be considered as part of the Constituency rather the Map clearly denominates that it is a longitudinal sandwich area between PP 70 and PP 71 of the District which is dividing both the Constituencies PP 70 & 71, whereas, the areas of QH Kassesay and PCs of Jandoki, Shori Maneka and Mirza

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Banghseenka connected with the other parts of the Constituency PP 69 disseminates the territorial unity and compact block; hence completely fall within the parameter and criteria provided by the Rule 10(5) of the Rules 2017. Existing and proposed Maps are attached for kind perusal.

- d) That inclusion of 'Kaleki Mandi' in PP 69 is violated to the principles of delimitation prescribed in the Act and Rules and negates the object of administration, governance, communication, compactness and effective dealing of services. The distance and lack of smooth interconnection with other constituency is more cumbersome not only for the general public but also for the representative to be elected from the constituency.
- e) That the principles settled for the delimitation of the constituencies by the Election Act and Rules clearly provided compact block keeping, in view the distribution of population, administrative units, facilities of communication and public convenience for each territorial constituency which can be achieved in

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instant case of PP 69 by excluding Kaleki and other area and including Kassesai and other area as proposed.

- f) That the population of the proposed Excluded area according to the new census 2017 and that of the proposed included area in PP 69 will not disturb the uniformity of the population of the constituency rather will only rectify the territorial limits of the constituency.
- g) That according to the new delimitation, the length of the Constituency PP 69 becomes about 50-KM, whereas, the proposed map will dequizee it to 15 to 20KM only which according to the provisions of the Election Act 2017 and Rules 2017 will provide a very smooth, conclusive convenient communication within the administrative units lying within the Constituency.
- h) That the existing delimitation of PP 69 as notified is politically motivated against the interest of the general public and settled principles of the delimitation and contrary to the principles of good governance and better services.

PRAYER:

In view of the submissions made above and keeping in view of the principles of delimitation settled by the Election Act and Rules for better services to the general public, and for keeping administrative, territorial, geographical homogeneity within the constituency PP 69 & 71 the delimitations of the Constituencies PP 69 and PP 71 be altered / modified as proposed in para 4 of the titled representation by excluding QH Kaleki, PCs of Kot Hassan Khan and Wachhoki and including QH Kassesha and PCs of Jandoki, Shori Maneka and Mirza Banghseenka in PP 69.

PETITIONER



MIAN SIKANDAR HAYAT BHATTI
s/o Mian Khyzar Hayat Bhatti,
r/o Mohallah Qamar Kota Janoobi,
Jalal Pur Bhattian, Tehsil Pindi
Bhattian, District Hafizabad.

Dated: 29.03.2018

(E-PIDIMARCH/18)

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