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BEFORE THE HON'BLE ELECTION COMMISSION OF
PAKISTAN

A 30/03/2018.
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**REPRESENTATION AGAINST DELIMITATION OF
CONSTITUENCIES OF DISTRICT KHUSHAB PURSUANT TO
SECTION 21 OF THE ELECTIONS ACT, 2017**

It is most respectfully submitted: -

1. That the Applicants are residents of "Union Council Hassan Pur Tiwana" and Villages "Meli Peer Bakhsh (Population: 2764)", "Meli SaddarDin (Population: 22)", "Chak Meli (Population: 328)" and "Sheikhowal (Population: 910)" within the revenue limits of tehsil & district khushab. The "Union Council Hassan Pur Tiwana" comprises of following villages:

- i. Hassanpur Tiwana (Population: 6181)
- ii. Joiya (Population: 2940)
- iii. Thatti Ghanjera (Population: 2166)
- iv. Kurpalka (Population: 5311)
- v. Mangoor (Population: 4194)
- vi. Muhammad Shah (Population: 676)
- vii. Jalalpur (Population: 2639)

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Total Population of Union Council Hassanpur Tiwana and villages "Meli Peer Bakhsh", "Meli Saddardin", "Chak Meli" and "Sheikhowal": 28,185/-

2. That according to preliminary delimitation of constituencies of district Khushab, "Union Council Hassanpur Tiwana" and villages "Meli Peer Bakhsh", "Meli Saddardin", "Chak Meli" and "Sheikhowal" have been included in PP 82 Khushab-I.
3. That the inclusion of "Union Council Hassanpur Tiwana" and villages "Meli Peer Bakhsh", "Meli Saddardin", "Chak Meli" and "Sheikhowal" into PP-82 Khushab-I blatantly violates the principles of delimitation of Constituencies enumerated in section 20 of the Elections Act, 2017, Election Rules, 2017 and guidelines of this Hon'ble Commission.
4. The Applicants request exclusion of "Union Council Hassanpur Tiwana" and villages "Meli Peer Bakhsh", "Meli Saddardin", "Chak Meli" and "Sheikhowal" from PP 82 Khushab-I and their inclusion into PP 83 Khushab-II on following grounds:

GROUND

- A. That in accordance with section 20 of the Elections Act, 2017 all constituencies for general seats shall, as far as

practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.

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- B. That a plain and simple look at the map of district Khushab appended with the instant representation makes it abundantly clear that **"Union Council Hassanpur Tiwana"** and villages **"Meli Peer Bakhsh"**, **"Meli Saddardin"**, **"Chak Meli"** and **"Sheikhowal"** are **geographically contiguous** to PP 83 Khushab- II.
- C. That the north-west boundary of **"Union Council Hassanpur Tiwana"** and afore-mentioned four villages is contiguous to **PP 83 Khushab- II stretching to approximately 31 km.** To the East is district Sargodha. Whereas, southern boundary with **PP 82 Khushab-I is approximately only 3 Km long.** Therefore, in order to **preserve geographical compactness**, it is necessary that **"Union Council Hassanpur Tiwana"** and villages **"Meli Peer Bakhsh"**, **"Meli Saddardin"**, **"Chak Meli"** and **"Sheikhowal"** are included back into **PP 83 Khushab- II** of which they were part and parcel in general elections 2013.
- D. As apparent from a brief examination of the attached map of district Khushab constituencies, the distance between last village (**Mangoor**) of **"Union Council Hassanpur Tiwana"**

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and district headquarter khushab in **PP 83 Khushab-II** is approximately 2 Km. A metalled road connects "**Union Council Hassanpur Tiwana**" and said four villages with district headquarter Khushab in **PP 83 Khushab-II**. On the other hand distance between "**Union Council Hassanpur Tiwana**" and said four villages from MC Noorpur Thal in **PP 82 Khushab-I** is approximately 70 km without facility of a metalled road. Whereas, distance from "**Union Council Hassanpur Tiwana**" and said four villages to MC Mitha tiwana in **PP 82 Khushab-I** is approximately 50 Km **via PP 83 Khushab- II**.

E. Therefore, all essential facilities of life including hospitals, schools and colleges located on walking distance within **PP 83 Khushab -II** are easily accessible to residents of "**Union Council Hassanpur Tiwana**" and aforesaid four villages. Hence, in view of overwhelming public convenience and facilities of communication, it is imperative that "**Union Council Hassanpur Tiwana**" and said four villages are included back into **PP 83 Khushab-II**.

F. That inclusion of "**Union Council Hassanpur Tiwana**" and said four villages back into **PP 83 Khushab- II** shall make total constituency population 456,034/-. On the other hand exclusion of "**Union Council Hassanpur Tiwana**" and aforesaid four villages from **PP 82 Khushab-I** shall make total constituency population 398,652/-. Therefore the variation in population of both constituencies shall remain less than 10 %.

PRAYER

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In view of the above, it is most respectfully prayed that upon acceptance of this representation, this Hon'ble Commission may:-

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- a. Alter and modify Constituencies **PP 82 Khushab-I and PP 83 Khushab-II of district Khushab** by excluding all villages of "Union Council Hassanpur Tiwana" and villages "Meli Peer Bakhsh", "Meli Saddardin", "Chak Meli" and "Sheikhowal" from **PP 82 Khushab-I** and including them back into **PP 83 Khushab-II** through issuance of final list of the Constituencies in the interest of justice and public interest.

Applicants:

Dated:27.03.2018

0301-5795676

1. Syed Sada Hussain Shah s/o Syed Natiq Hussain Shah r/o Muhammad Shah PO Kurpalka, tehsil & District Khushab.

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2. Qamaruddin s/o Allah Bakhsh r/o Meli Saddardin PO Tibba Qaimdin, tehsil & district Khushab.

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3. Tahirulhasnain s/o Malik Muhammad Ashraf r/o Joiya, tehsil & district Khsuhab.

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Through:

Handwritten signature of Muhammad Moazzam Sher Kallu

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