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BEFORE THE HON'BLE ELECTION COMMISSION OF PAKISTAN

1 (105/20/8)

REPRESENTATION AGAINST DELIMITATION OF CONSTITUENCIES OF DISTRICT KHUSHAB PURSUANT TO SECTION 21 OF THE ELECTIONS ACT, 2017

It is most respectfully submitted: -

- That the Applicant is resident of village "Botala" (Population: 9590) within the revenue limits of tehsil & district khushab.
- That according to preliminary delimitation of constituencies of district Khushab, "Botala" has been included in PP 82 Khushab-I and NA 94.
- 3. That the inclusion of "Botala" into PP-82 Khushab-I and NA 94 patently 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 Applicant requests exclusion of Village "Botala" from PP 82 Khushab-I and NA 94 and its inclusion into PP 83 Khushab-II and NA 93 on following grounds:

GROUNDS

- 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.
 - B. That a plain and simple look at the map of district Khushab appended with the instant representation makes it abundantly clear that village "Botala" is situated at a distance of less than 2 km from MC Haddali and about 8 km from tehsil headquarter Khushab in Jauharabad, which fall under PP 83 Khushab-II and NA 93. On the other hand distance between village "Botala" and tehsil headquarter Noorpur Thal of PP 82 Khushab-I and NA 94 is approximately 70 km.
 - C. Furthermore, It can be seen from the map that village "Botala" is situated along main highway going through tehsil headquarter Khushab in Jauharbad of PP 83 Khushab- II and NA 93.
 - D. Therefore, all fundamental facilities of life including hospitals, schools and colleges located within PP 83

 Khushab –II and NA 93 are at a walking distance from

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village "Botala". Hence, in view of overwhelming public convenience and facilities of communication, it is imperative that village "Botala" is included into PP 83 Khushab-II and NA 93.

- E. That as far as physical features of village "Botala" are concerned, it comprises of rich fertile land similar to most areas of PP 83 Khushab-II as opposed to PP 82 Khushab-I/NA 94, which is characterized by desert Thal. Thus, there is a huge disparity between civilization, culture and traditions of Village 'Botala' and PP 82 Khushab-I/NA 94.
- F. That inclusion of village "Botala" into PP 83 Khushab- II and NA 93 shall make total constituency population 437,439/- and 668,338. On the other hand exclusion of village "Botala" from PP 82 Khushab-I and NA 94 shall make total constituency population 417,247/- and 612,961/-. Therefore the variation in population of both constituencies shall remain less than 10 %.

PRAYER

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

a. Alter and modify Constituencies PP 82 Khushab-I and NA 94 and PP 83 Khushab-II and NA 93 of district Khushab by excluding village "Botala" from PP 82

Khushab-I and NA 94, and including it into PP 83
Khushab-II and NA 93 through issuance of final list of the Constituencies in the interest of justice and public interest.

Applicant:

Muhammad Ramzan s/o RabNawaz r/o Botala, tehsil & district Khushab

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Through:

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Advocate

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