

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

Representation No.            /2018

Malik Mohammad Javaid Iqbal Awan Son of Malik Karam Bakhsh Awan,  
Cast Awan Resident of village padhrar, Tehsil and District Khushab

0300-5221182 - 0300-4818116  
.....Petitioner

Versus

**Delimitation Committee Under Rule 9, Election Rules, 2017**

.....Respondents

**REPRESENTATION UNDER SECTION 21(2) OF ELECTION ACT, 2017**  
**READ WITH RULES 12 OF ELECTION RULES, 2017 AGAINST**  
**PRELIMINARY REPORT SUBMITTED BY DELIMITATION**  
**COMMITTEE, REGARDING (CONSTITUENCY NO. PP-84, DISTRICT**  
**KHUSHAB), IN THE PROVINCE OF PUNJAB**

Respectfully Sheweth:-

1. That the Petitioner was elected to the Provincial Assembly of Punjab in the General Election of 2002 , 2008 and 2013 from constituency PP-39 Khushab-I.
2. That the Petitioner is a registered voter in Constituency No. PP-84, Khushab(III) and his name appears in the Electoral list of 2012, pertaining to the Electoral Area Padhrar, Circle No (143090509) Tehsil and District Khushab at serial No 633. The extract of the electoral list is attached herewith as **Annexure -A** for ready reference .
3. That in all above said General Election of 2002, 2008 and 2013 District Khushab was comprised of 02 Constituencies of National Assembly and 04 Constituencies of Provincial Assembly National Census , Constituencies of Punjab Assembly were revisited and now Khushab District is comprised of PP- 82 (I) PP- 83 (II) PP- 84 (III) according to the preliminary report , submitted by delimitation committee.

*Mohd Javed.*

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4. That according to the preliminary report of delimitation committee, the proposed constituency PP 84 (III) is comprised of following areas of District Khushab. (Copy of Map of District Khushab issued by Election Commission of Pakistan is attached here with as **Annexure-B** for ready reference)

a) Nowshera Tehsil	117,942
b) Katha saghral QHs	78,351
c) Quaidabad Tehsil	230,320
Total Population	427,849

5. It may pertinent to mention here, that area of any constituency should be adjacent by road without intervention of area of other constituency for the convenience of any candidate or voter and resident of said constituency but the delimitation committee of the Election Commission has erroneously connected the area of Tehsil Quaidabad with area of Tehsil Nowshera and Katha Saghral QHs, which is not linked by road without crossing the area of PP-83 (II) comprised of Khushab city, Juaharabad city, Hadali Municipal Committee and Mitha Tiwana Municipal Committee.

6. That under the situation mentioned in para No 5, a candidate of Tehsil Nowshera and Katha Saghral QHs cannot enter into the area of Quaidabad Tehsil without crossing the area of PP 83 (II) comprised of Khushab city, Jauharabad city, Hadali Municipal Committee and Mitha Tiwana Municipal Committee of PP 82 (I) likewise a candidate of Quaidabad Tehsil also can not enter into the area of Katha Saghral QHs and Nowshera Tehsil without crossing the above said area of PP-83(II) and PP-82 (I) Khushab which is not only unfair, unjust and inconvenient but also against the Election Rules 2017.

*Mohd Javed*

7. That the road from Quaidabad leads to P.A.F Sakesar Base linked with Tehsil Nowshera shown in map of District Khushab is prohibited for public transport under the security point of view, by the Defence Authority of P.A.F Base sakesar and under this situation PP 84 (3) is comprised of two parts which are not adjacent with each other without intervention of long distance area of PP-83 (II) and PP-82 (I) Khushab

8. It may pertinent to mention here, that constituency No. 1 of every District should start from the Northern side of said District as it was fallowed in Khushab District in all General Election held in past but same procedure is not adopted by Delimitation committee which is violation of Election Rules 2017 .

9. That the petitioner propose the reconstitution of PP -82, PP- 83 and PP- 84 on the basis of socially, ethnically, politically, administratively, particularly geographical contiguity, physical features, public convenience and all other cognate factors to ensure homogeneity in the creation of constituencies as under:

PP 82 (1)

a) Tehsil Nowshera	117,942
b) Katha Saghral QHs	78,351
c) Kund QHs	65,002
d) Khushab 1 QHs	24,585
e) Khushab 2 QHs	23,164
f) Khushab M.C.	119,384
Total Population	428,428

Mohd Javed

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PP 83 (2)

a). Tehsil Quaidabad	230,320
b) Mitha Tiwana QHs.	49,632
c) Mitha Tiwana M.C.	33,479
d) Hadali M.C.	53,627
e) Jauharabad QHs.	50,833
f) Adhi Sargal Patwar Circle. of Adhi Kot QHs	8,593
Total Population	426,484

PP 84 (3)

a). Tehsil Noor Pur Thal, (minus adhi sargal patwar circle of Adhi Kot QHs).	234,387
b). Girot QHs.	100,431
c). Jauhabad M.C.	91,254
Total Population	426,387

*Mohd Javed.*

*[Signature]*

**10.** That the above mentioned proposed constituencies reconstituted by the petitioner are just , fair and according to Election Rules on the basis of socially, ethnically, politically, administratively, particularly geographical contiguity, physical features, public convenience and all other cognate factors to ensure homogeneity in the creation of constituencies as proposed constituencies are shown in three different color in Map of Khushab District which is attached herewith as **Annexure-C**, for kind perusal of Election Commission Of Pakistan.

**PRAYER**

In the above circumstances, it is most respectfully prayed that Honorable Election Commission of Pakistan may graciously bring the necessary alteration / changes in the preliminary report which has been proposed by Delimitation Committee , to meet the ends of justice, fair play and equity for the citizen of District Khushab who are emotionally disturbed with the proposals of Delimitation Committee .

Any other relief which This Honorable Election Commission may deem fit in the above said circumstances for the ends of justice.

PETITIONER

Malik Mohammad Javaid Iqbal Awan

0300-5221182

Through;

Council and authorize Agent

Malik Bashir Ahmed Awan  
Advocate High Court  
Chamber No. 100, District Courts,  
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