

THE SECRETARY, ELECTION COMMISSION OF PAKISTAN,
CONSTITUTION AVENUE ISLAMABAD.

REPRESENTATION/OBJECTIONS WITH RESPECT TO THE
PRELIMINARY DELIMITATION OF NA-119 SHEIKHUPURA, UNDER
SECTION 21/22 OF THE ELECTION ACT, 2017 READ WITH THE
ELECTION RULES, 2017

Respected Sir,

1. The applicant is the registered voter of electoral area Ghandhowal, circle Ghandanwala Tehseel Muridkay, district Sheikhpura, NA-119, Sheikhpura I (the constituency). The copy of the voter's list is appended herewith. The contents of the same may very kindly be considered and read as the part and parcel of this paragraph.
2. This August Commission, on the provisional results of the preceding census, conducted an exercise of delimitation under Article 51 of the Constitution of Pakistan thereafter preliminary proposals with regard to the delimitation of the National and Provincial Assemblies constituencies, and the preliminary delimitation has also been published vide the notification dated 5th March, 2018 (copy attached herewith). District Jhelum, is constituted in four separate constituencies i-e NA.119 to NA.122, Sheikhpura I, II, III and IV. (Copy of the Notification is attached herewith)
3. That a brief perusal of the proposed delimitation reflects that the it is not in accordance with the law, it is flawed and the committee has failed to abide by the mandatory principles of delimitation and has proposed the exercise on the basis of conjunctures and by disregarding the fundamental requirements that are sine qua non to conduct the exercise of delimitation. Hence the same is being objected on the following;

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inappropriate and bad both in law and on facts and seems to have been conducted being oblivion to the principles of delimitation under section 20 of the Election Act 2017 read with the Election rules. Hence liable to be revisited, amended and/or modified forthwith.

- B. That perusal of the proposed delimitation as per the notification and scrutiny of the proposed (marked) MAP, the boundaries of the respective constituencies of the district (appended herewith) reflects that the delimitation committee conducted the exercise without keeping the geographical facts/compactness, long distances and territorial actualities in its view and the proposed preliminary delimitation is defeating all the purposes and intents of law relevant in this regard.
- C. That a plane study of the proposed delimitation along with the proposed MAP of the district reflects that the delimitation committee conducted the exercise without following the geographical actualities hence committed errors that in case not amended or altered or disregarded, shall cause problems for the voters of the both constituencies.
- D. That the proposed delimitation lacks symmetry and defeats the physical features of the area and also by negating the existing boundaries and disregarding the hurdles with regard to communication and long distances, hence it is devoid of cognate features that could ensure homogeneity and symmetry in the proposed constituencies and also by ignoring physical features of the electoral area that will be causing immense hardships in communications.
- E. That according to the proposed preliminary delimitation of Sheikhpura, **I**

PP-137 Sheikhpura III

(a) Tehsil Muridke:-

(b) Following QH of Tehsil Ferozwala:

- i) Ferozwala-1
- ii) Ferozwala-II excluding following Pcs
 - a) Wandala Dial Singh
 - b) Faizpur Khurd:

C) Patwar Circle Chakl 46 UCC of QH Kot Pindi Das and

d) MC Ferozwala

of District Sheikhpura.

Population: 885990

F. That the above referred proposal is flawed, in appropriate that has been carried out being oblivion to the principles of delimitation under section 20 of the Election Act 2017. Hence liable to be revisited forthwith.

That in complete disregard of physical features of the area by ignoring the geographical compactness and existing boundaries. It is important to highlight that the constituency is situated on the both sides of River Ravi making the candidates to encircle more than 100 kilometers, hence inclusion of the area across GT road makes it extremely difficult for the constituents to communicate and access from one end to another end. It will be of benefit to submit that the proposed delimitation will badly effect the fundamental rights of the constituents.

G. It is submitted that in order to ensure the honest and fair elections under the Constitution and to meet with the legal requirements of law. to balance out the constituencies, to provide level playing field, and to establish geographically compact constituencies by keeping intact, the physical features and existing boundaries of the adjacent nearby areas and to ensure homogeneity, symmetry and to facilitate and with object to ease out the communications between the constituencies to keep the proposed

H. In case the exercise of delimitation is to be carried as imperative that may be taken, that may be considered as proposed by the applicant in his proposal that has been attached herewith and may very kindly be considered as part and parcel of the representation in hand and read as integral part of the same. (The counter delimitation proposal of entire District as per rules and guiding principles is appended herewith along with MAP). The same is reproduced hereinunder;

NA 119- Sheikhpura-1

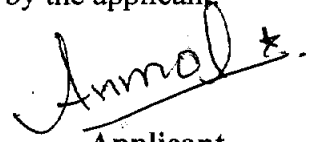
- a) Tehsil Muridke excluding the following
Patwar circles of QH Muridki
 - i) Choway Wali Khan
 - ii) Bhian Wala
 - iii) Chak 27 UCC
 - iv) Sheikhpura Bedad
 - v) Wandala Nasir
 - vi) Qila Sattar Shah
 - vii) Noon
 - viii) Joiyan Wala
 - ix) Khana Lubana
 - x) Khatiala Virkan
 - xi) Bedada Pur
 - xii) Sekhawan
- b) Ferozwala-1
- c) Ferozwala-II excluding PC Faiz Pur Khurd.
- d) QH Ferozwala-II including PC
Wadala Dyal Singh &
PC Chak 46 UCC of Qh Kot Pindi Das
- e) QH Kot Pindi Das
PC Kala Shah Kaku
PC Sham ky
- f) MC Ferozwala
of Sheikhpura District.

Population; 891490

I. To appraise this august commission, the preceding proposal has also been highlighted in a map attached with this representation. A bird eye view will give this commission a comprehensive analysis with regard to the delimitation of the constituency, right in accordance with the principles provided in law. It will be pertinent to submit that the preceding proposal do not in any manner frustrate the formula of population in any manner.

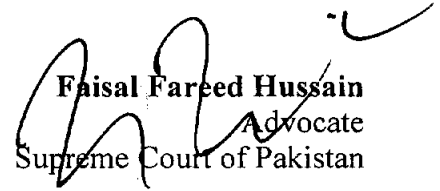
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In view of the above submissions, it is respectfully prayed that the representation/objection Petition may very kindly be allowed and the constituencies in District Sheikhpura i-e NA.119 and others may very graciously be amended, altered and or modified as proposed by the applicant.



Applicant
Waqas Ahmed

Through;



Faisal Fareed Hussain
Advocate
Supreme Court of Pakistan

Islamabad;
3rd of April 2018