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**BEFORE THE ELECTION COMMISSION OF PAKISTAN.**

**ISLAMABAD**

**Ch. Kashif Hanif**

Son of Ch. Muhammad Hanif

R/o: A/640, Kareem Block, Allama Iqbal Town, Lahore.

**REPRESENTATION**

**UNDER SECTION 21(3) ELECTIONS ACT 2017 READ WITH RULE 12 OF  
ELECTION RULES 2017 REGARDING ALTERATIONS FOR MODIFICATIONS IN  
THE PRELIMINARY LIST OF CONSTITUENCY NA-130 & PP-160**

Respectfully Sheweth,

1. That the petitioner is a registered voter of Kareem Block Allama Iqbal Town, Lahore of NA-130 & PP-160. The new NA-126 has been overlapped in to NA-130 and PP-160 & PP-151 in the preliminary report of the list of constituencies of Provincial & National assembly published by the Election Commission of Pakistan vide notification No. F8(3) /2018-Elc-I dated 5<sup>th</sup> March 2018.
2. The undersigned is aggrieved by the new preliminary delimitation and seeks proposed delimitation of NA126, NA-130, NA-135 and PP-159, PP-160, PP-165 on the following grounds.

## Grounds

- a) Circle # 06 & 07 comprising of Huma Block, Zeenat Block, Badar Block & Ravi Block of Charge # 18554 of City Tehsil are the originally part of Allama Iqbal Town of Model Town Tehsil which have been wrongly attached across the road of the area of City Tehsil. These areas of Model Town Tehsil cannot be separated from Allama Iqbal Town which has been wrongly included in NA-126 PP-151 of City Tehsil. The above two circles # 6 having population **(8215)** & Circle # 7 having population **(4664)** of Charge # 18554 of City Tehsil may be excluded from NA-126 & be included in NA-130. Similarly these two circles may also be excluded from PP-151 and included in PP-160 of Model Town Tehsil where these are originally belongs.
- b) Circle # 6 having population **(7450)** & Circle # 7 having population **(6574)** of Charge # 18555 of City Tehsil are consisting of Nishtar Block, Kamran Block, Kareem Block, Mehran Block are falling in Allama Iqbal Town which are the integrated part of the same locality and cannot be separated or detached from Allama Iqbal Town of Model Town Tehsil. The above mentioned areas of Model Town Tehsil i.e. circle # 6 & 7

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charge # (18555) are wrongly attached with the area of City Tehsil which is across the main Multan road and Orange Line train route. These areas are geographically and physically compact and intact with Allama Iqbal Town. It is further added that main Multan Road and Orange Line Train route are the natural boundary/ division of circle # 6 & 7 against the other remaining circles 1, 2, 3, 4, 5 because main Multan Road and Orange Line Train is divided its and make it natural boundary of Circle # 6 & 7 against its rest of circles Charge # (18555) of City Tehsil. As such there is no direct access of circle No. 6 & 7 with circle # 1, 2, 3, 4, 5. Moreover, physically and geographically circle 6 & 7 are naturally compact part of the Allama Iqbal Town locality relating to NA-130 and PP-160. Therefore, circle # 06 & 07 of Charge # 18555 may be excluded from NA-135 & PP-167 and may be included in NA-130 & PP-160.

- c) It is further proposed that Charge # 25911 having population **(43008)** of Model Town Tehsil may be excluded from PP-159 and Included in PP-165. This charge has the natural boundary of other charges in the proposed PP. Resultantly there is no change in its corresponding NA-130.

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d) PP 160 is consisting on the eleven census charges. Ten charges are left side of the Muslim Town Canal, but only one Charge # 25936 having population **(61,239)** is on the right side of Metro Bus lane which are the Geographically and physically contrary to the principle of delimitation of section 20(1) of Election Act 2017 regarding compact area and communications. Therefore, Charge # 25936 may be excluded from PP-160 and included in PP-159. As a result of my above said proposal, its corresponding NA-130 will remain intact and there will be no disturbance in its corresponding NA-130.

e) Charge # 29534 having population **(25548)** of Model Town Tehsil is already falling in PP-151 which is part of corresponding NA-126. In order to compactness of areas it is proposed that charge # 25934 may be excluded from NA-130 and included in NA-126. Resultantly, there would be natural boundary which will divide either constituency at a big road that is Peer Ghazi Road instead of street or small mohallahs.

f) That the delimitation of both constituencies PP-159 & PP-160 have not been done as mentioned in rule 10(5) of the Election Rules 2017 according to which the delimitation of

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constituencies of should start from the northern end of the district, or as the case may be and the proceed clock wise keeping in view that population compact area among the constituencies of an Assembly shall remain as close as per prescribed quota. But the requirement of law on principle of delimitation under section 20(1) of Election Act 2017 has been overlooked in the delimitation process by the Delimitation Committee.

**g)** It is settled law that in case of urban areas census circles should be attached and remains compact area and would be direct communication which may not be separated affecting the natural boundaries of the constituencies. Whereas this principles has not been adopted in this case.

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**Population of Preliminary & Proposed Delimitation of NAs**

Sr. #	Population Preliminary Delimitation	Population Proposed Delimitation
1.	<b><u>NA-126 (Lahore-IV)</u></b> <b><u>805,070</u></b>	<b><u>NA-126 (Lahore-IV)</u></b> <b><u>817,739</u></b>
2.	<b><u>NA-130 (Lahore-VIII)</u></b> <b><u>818,078</u></b>	<b><u>NA-130 (Lahore-VIII)</u></b> <b><u>819,433</u></b>
3.	<b><u>NA-135 (Lahore-XIII)</u></b> <b><u>815,592</u></b>	<b><u>NA-135 (Lahore-XIII)</u></b> <b><u>801,568</u></b>

**Population of Preliminary & Proposed Delimitation of PPs**

Sr. #	Population Preliminary Delimitation	Population Proposed Delimitation
1.	<b><u>PP-151 (Lahore-VIII)</u></b> <b><u>381,303</u></b>	<b><u>PP-151 (Lahore-VIII)</u></b> <b><u>368,424</u></b>
2.	<b><u>PP-159 (Lahore-XVI)</u></b> <b><u>370,265</u></b>	<b><u>PP-159 (Lahore-XVI)</u></b> <b><u>388,496</u></b>
3.	<b><u>PP-160 (Lahore-XVII)</u></b> <b><u>412,082</u></b>	<b><u>PP-160 (Lahore-XVII)</u></b> <b><u>377,746</u></b>
4.	<b><u>PP-165 (Lahore-XXII)</u></b> <b><u>350,027</u></b>	<b><u>PP-165 (Lahore-XXII)</u></b> <b><u>393,035</u></b>
5.	<b><u>PP-167 (Lahore-XXIV)</u></b> <b><u>360,999</u></b>	<b><u>PP-167 (Lahore-XXIV)</u></b> <b><u>346,975</u></b>

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## Pray

It is humbly prayed that above mention proposal may kindly be approved and revised delimitation as requested above may be included in the final list of delimitation.

Any other relief which deems appropriate may also be granted to the petitioner in the interest of Justice.

*Kashif*

Dated: 03-04-2018

**(Ch. Kashif Hanif)**

S/o Ch. Muhammad Hanif,

R/o: A/640, Kareem Block,

Allama Iqbal Town,

**Lahore.**

**NA-130 (Lahore VIII)**

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