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

Manzoor Hussain S/O Shahamat Ali Resident of House # 53-A Bultex Colony Niaz Baig Lahore.

**PETITIONER**

**VERSUS**

1- Election Commission of Pakistan , Islamabad

**REPRESENTATION**

UNDER SECTION 21(3) ELECTIONS ACT 2017 READ WITH RULE 12 OF ELECTIONS RULE OF 2017 REGARDING ULTRATIONS AND MODIFICATIONS IN THE PRELIMINARY LIST OF THE CONSTITUENCY OF THE LAHORE DISTRICT.

Respectfully sheweth,



That the petitioner is Chairman of Union Council No 113 District Lahore and Candidate for National Assembly from NA-135 and Enroled as Register Voter on Electrol Rol Vote No 662 Census Block Code No 185010601 Circle No 6 Charge No 01 Tehsil Lahore City District Lahore Under CNIC No 35202-2702269-5 . As per the notification number FB (3)/2018-ELC-1 dated 15 march 2018. The whole constituency has been changed and divided into different constituencies without his knowledge in preliminary report of the list of constituencies of provincial as well as national assembly. That the under signed is now candidate from NA-135 Lahore and agrived by the new Delimitations and seekes proposed delimitation in NA-135, NA-126, NA-131, NA-133, NA-134 and NA-135 without bringing major changes in all above mention constituencies under following amongst other.

**GROUNDS:**

- I. That the new delimitations as published in preliminary list is against the provisions of section 20 of election act 2017 read with rule 10 and 12 of elections rule 2017
- II. That the Election Commission of Pakistan during delimitation process of NA-135 has divided it in such way that it has adjusted by including and excluding different charge and divided it into 3 tehsil of district Lahore. That the NA-135 is new constituency in district Lahore which comes into force by dividing the other above mentioned constituencies.

III. That the population required for the relevant population census could be retained by bringing minor changes in NA-135 Lahore , As Per Required Compactnes The Population Required for NA - 135 is Completed by Including Tehsil City and Tehsil Raiwind and if Circle No 01 and 02 of Charge No 04 included in NA - 134 Lahore XII then Compectness will be Completed , The Above Said Circles have already been included in PP - 169 Lahore The moste Part of PP- 169 is fall in NA - 134 Lahore XII . That as per new delimitation the suggested NA-135 and Other Constitunies in Lahore is as following.

<b>Suggested By Election Commission</b>	<b>Proposed Delimitations</b>
<p><b>NA-126 Lahore-IV</b> the following census charges of Lahore city Tehsil:</p> <ol style="list-style-type: none"> <li>1. Charge No.37</li> <li>2. Charge No.38</li> <li>3. Charge No.39</li> <li>4. Charge No.49</li> <li>5. Charge No.50</li> <li>6. Charge No.51</li> <li>7. Charge No.52</li> <li>8. Charge No.53</li> <li>9. Charge No.54</li> <li>10. Charge No.56</li> <li>11. Charge No.57</li> <li>12. Charge No.58</li> <li>13. Charge No.59</li> <li>14. Charge No.66</li> <li>15. Charge No.67</li> </ol> <p><b>Total: 805070</b></p>	<p>Excluding charge No. 59 of Tehsil city.</p> <p><b>Total: 767043</b></p>
<p><b>NA-131 Lahore-IX</b> the following census charges of Walton Cantt of Lahore Cantt Tehsil:</p> <ol style="list-style-type: none"> <li>1. Charge No.1</li> <li>2. Charge No.2</li> <li>3. Charge No.3</li> <li>4. Charge No.4 excluding Circle # 6 and 7.</li> <li>5. Charge No.5</li> <li>6. Charge No.6</li> <li>7. Charge No.7</li> <li>8. Charge No.8</li> <li>9. Charge No.9</li> <li>10. Charge No.10</li> <li>11. Charge No.11</li> <li>12. Charge No.5 of Lahore Cantt district Lahore.</li> </ol> <p><b>Total: 772182.</b></p>	<p>Including circle No. 6, 7 of charge no.2 of Tehsil Model Town.</p> <p><b>Total: 814804</b></p>
<p><b>NA-133 Lahore-XI</b> the following census charges of Model Town Tehsil:</p> <ol style="list-style-type: none"> <li>1. Charge No.12</li> <li>2. Charge No.13</li> <li>3. Charge No.14</li> <li>4. Charge No.15</li> <li>5. Circle number 1,2,3 &amp; 4 of Charge No.16</li> <li>6. Charge No.17</li> <li>7. Charge No.18</li> <li>8. Charge No.19</li> <li>9. Charge No.20</li> <li>10. Charge No.21</li> <li>11. Charge No.24</li> <li>12. Charge No.25</li> </ol> <p><b>Total: 798185.</b></p>	<p>Including circle No.5 of charge no.4 of Tehsil Model Town.</p> <p><b>Total: 821358</b></p>
<p><b>NA-134 Lahore-XII</b> the following</p>	<p>Excluding circle no. 6, 7 of charge no.2</p>

<p>census charges of Lahore-XII, Model Town Tehsil:</p> <ol style="list-style-type: none"> <li>1. Charge No.4 excluding circle No.1 &amp; 2.</li> <li>2. Charge No.16 excluding circle No.1, 2, 3 &amp; 4.</li> <li>3. Charge No.2</li> <li>4. Charge No.3</li> </ol> <p><b>Total: 804774</b></p>	<p>of Tehsil Model Town. Excluding circle no.1, 2, 3, 6 of charge no.3 of tehsil model town. Including circle no.5 of charge no.4 of tehsil model town. Excluding circle no.1, 2, 3 &amp; 4 of charge no.16 of tehsil model town.</p> <p><b>Total: 829626</b></p>
<p><b>NA-135 Lahore-XIII the following census charges of Lahore city tehsil:</b></p> <ol style="list-style-type: none"> <li>1. Charge No.1</li> <li>2. Charge No.55 (B Circle No.7 of charge of Raiwind Tehsil &amp; circle No.1 &amp; 2 of charge No.4 of Model Town Tehsil.</li> </ol> <p><b>Total: 815595</b></p>	<p>Charge no.1 tehsil city. Charge no.55 of tehsil city. Charge no.59 of tehsil city. Charge no.1 circle no. 1, 3 &amp; 7 of Tehsil Raiwind.</p> <p><b>Total: 806544</b></p>
<p><b>NA-136 Lahore-XIV the following census charges of Raiwind Tehsil of Lahore excluding Circle No. 7 of Charge No.1 of district Lahore.</b></p> <p><b>Total: 794917</b></p>	<p>Charge no.3 circle no.1, 2, 3 &amp; 6 of tehsil model town. Complete Tehsil Raiwind excluding circle no.1, 3 &amp; 7 of charge no.1</p> <p><b>Total: 751345</b></p>



**COPY OF MAP NA-135 LAHORE-XIII ALONG WITH ALL ABOVE SUGGESTED AND PROPOSED DELIMITATION IS ATTACHED HEREWITH FOR THE KIND PEROSAL OF THIS HONORABLE COMMISSION:**

- That the delimitation of all above constituencies including NA-135 Lahore-XIII have not been done as mentioned in rule 10(5) of the election rule 2017 according to which delimitation of the constituencies shall be start from the northern of the district or as the case may be the agency and then proceed clockwise in zig zag manner. Keeping in view in that population among the constituencies of an assembly shall remain as close as may be practicable to quota. Hence the requirement of law has been overlooked in the delimitation process by the commission.
- It is settled that census circles should not be divided and broken affecting the basic boundaries of the constituencies whereas the same has been done against the procedure define by the law.
- That as per amended delimitation the area included and excluded have been edit without any justification and by ignoring by ground realities.
- That as per new proposed delimitations structure the distribution of population has been geographically compact area facilitating communication and roads approached with the object of public convenience whereas the suggested delimitation overlooked in the process of delimitations.

In view of above submission it is respectfully prayed that proposed alterations and modification may very kindly be accepted and the boundaries of NA-135 Lahore-XIII may very kindly be adjusted as proposed in above said column and Attached Map .

Any other relief which this honorable commission deems fit and appropriate may also be granted to the petitioner in the supreme interest of justice.

**PETITIONER**



**Manzoor Hussain S/O Shahamat Ali  
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