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

MEMORANDUM / REPRESENTATION BY:-

Ch. Muhammad Kamran Ali Khan S/o Ch. Muhammad Aslam Khan resident of Village and PO: Chakri Tehsil and District Rawalpindi CNIC No. 37405-0643262-9 Cell No.0300-8504718

**SUBJECT:-**                    **REPRESENTATION / OBJECTION PETITION**  
**AGAINST THE PRELIMINARY DRAFT AND**  
**PROPOSED DELIMITATION OF THE**  
**CONSTITUENCIES OF DISTRICT RAWALPINDI**  
**PROVINCE OF PUNJAB PUBLISHED BY THE**  
**ELECTION COMMISSION OF PAKISTAN,**  
**ISLAMABAD**

Respectfully sheweth:-

1. That the applicant namely Ch. Muhammad Kamran Ali Khan son of Ch. Muhammad Aslam Khan is resident of Village and PO: Chakri Tehsil and District Rawalpindi and is the bona fide voter member of the Chakri constituency, the above mentioned area is part and parcel of Tehsil and District Rawalpindi since decades. (Copy of ID Card of the applicant and Copy of Voter list are annexed herewith as annexure E & F respectively)



2. That ECP proposed the preliminary / draft delimitation proposal of Provincial Assembly of Punjab District Rawalpindi and as per law offered the objection and proposal from the voter as well as the proposed participant of forth coming general election.
3. That the applicant has been participating in the election from the provincial constituencies since long, when the constituency was marked as PP-6 and lateron it was numbered as PP-7 and now in preliminary draft and proposed delimitation of the constituencies by the election commission of Pakistan Islamabad is marked as PP-10.
4. That while preliminary draft and proposed delimitation of the constituencies of District Rawalpindi the delimitation committee has not acted in accordance with the law and in post haste manner and while ignoring the principles laid down by the apex court on the subject of delimitation and totally ignoring the relevant provisions of Election Act 2017 and rules thereupon i.e. Election Rules 2017.
5. That after preparation preliminary draft and proposed delimitation of the constituencies of country the election commission issued proposed maps alongwith the proposal and offered objection by way of representation as per law. The preliminary draft / list of constituencies, proposed delimitation of the provincial constituencies of District Rawalpindi alongwith proposed map issued by the election commission is annexed as annexure A and B respectively.

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6. That the applicant as being a political worker and intend to participate in the forth coming election from his native constituency has great apprehension upon the preliminary draft and proposed delimitation of the constituencies of District Rawalpindi as being unlawful and against the fact and geographical situation of the area which are liable to be revised inter alia on the following amongst other

**GROUND:-**

A. That while preliminary draft and proposed delimitation of the constituencies of District Rawalpindi the election commission has marked the native area / some of the old constituency of the PP-7 in the different proposed provincial constituency and while doing so all principles were ignored and PP-10 was marked in two different parts of two different Tehsils which are not physically compact to each other and while going through Q.H Adhwal towards Q.H Sukho and Basali and Saghri there is no connection between the Q.H and even through any Patwar Circle of the notified Q.H i.e. Saghri, Basali, Adhwal, Chakri and Sehal and Sukho Q.H of Tehsil Gujar Khan District Rawalpindi which is sheer violation of law.

B. That according to proposed draft list of constituencies of PP-10 were published in media where it came into the knowledge of the applicant that Q.H Sukho from

Tehsil Gujar Khan District Rawalpindi from PP-10 which was previously the part and parcel of PP-3 / 4. The above said proposed draft delimitation is against the principle of delimitation and against the public interest totally unwarranted and highly misconceived approach by the concerned authorities.

C. That the proposed map of provincial assembly of District Rawalpindi which was issued by the Election Commission of Pakistan, shows that the proposed delimitation against the principle of delimitation and amounts to add misprices of the people of area. According to the proposed map issued by the Election Commission annexed with the application the area of Q.H Sukho of Teshil Gujar Khan District Rawalpindi shown in PP-10 is not geographically compact with the remaining Q.Hs i.e. Saghri and Basali on one hand and Q.Hs Adhwal on the other hand which is not warranted by law in any way rather it is against the law and will create hurdles and difficulties for the voter and public interest.

D. That it is pertinent to mention here that while approaching Q.H Sukho one has to cross Q.H Banda which is situated in PP-14 and in the same way while going to Q.H. Saghri and Basali one has to again cross Q.H Banda of PP-14 which is not warranted by relevant law and rules.

E. That the above said proposed insertion of Q.H Sukho from a different Teshil is not naturally, physically area of PP-10 and having no nexus with the remaining Q.Hs which is against the law and principle of nature justice.

F. That it can easily indentify and enumerate the principle of delimitation which law provides to be complied with respective and implemented in letter and spirit while delimiting the constituencies, so not only candidates but also the public at large / voters could be benefited. It can number such principles as under:-

- i. Distribution of equal population
- ii. Geographically compactness
- iii. Physically features
- iv. Existences boundaries of administration Unit
- v. Facilities of Communication
- vi. Public Connivance
- vii. And such other cognate features which ensure homogeneity

G. That procedure of delimitating constituency has been provided under sub rule (3) of rule 10 of Election Rules 2017 reproduced as under:-

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3. In preparing draft proposal for delimitations of constituencies, delimitation committee shall follow

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the principle of delimitation as laid down in section 20, producer given this capture and guidelines provided by the commission for time to time.

4. The Constituencies for a assembly shall not ordinarily extended to more than one District exist in exceptional circumstances for reason to be recorded by the delimitation committee.

Provided that a Patwar Circle or as the case may be a Tapadar circle shall be basic unit for delimitation and it shall not be broken under any circumstances.

5. As far as possible, delimitation of constituencies of an assembly shall start from the Northern end of district or as a case may be, the agencies and then proceed clock wise in Zig Zag Manner keeping in view that population amongst the constituencies of an assembly shall remained as close as may be practicable to the Quota.

Provided that Quota under sub rule shall be determined by dividing total population of district or agency with number of seats allocated to the District or Agency

Provided further that the variation in the population between two or more constituencies shall not ordinarily exceed 10% and the delimitation committee shall record reason if, in exceptional circumstances, the variation as exceed the limit.

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H. That keeping in view of principles as enshrined in chapter III of the Election Act 2017 read with chapter III of the Election Rules 2017, a plausible / suggestion has been prepared for the consideration of the delimitation committee while preparing a draft the delimitation proposal. The proposal / suggestion has strictly being framed in compliance of principle of delimitation in their entirety and totality.

I. That the suggestion is submitted to avoid gerrymandering in any manner to create a safe constituency for a particular candidate or contestant. The proposal is submitted as under which meets the requirements of law and based on principle of delimitation of constituencies for the conduct of free, fair and just election in District Rawalpindi as in envisaged under the constitution, if the constituencies are gerrymandered, the elections result cannot attained legitimacy which resultantly injure the credibility of parliament and legislative bodies as well as the election process. The preliminary draft / list of proposed delimitation of the provincial constituencies of District Rawalpindi prepared by the applicant alongwith the marked map which are annexed herewith as annexure C & D respectively)

J. The proposed amendments in the preliminary delimitation according to the map attached with the application are hereby coloured map of each

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constituencies of District Rawalpindi for the purpose of understanding.

**PRAYER:-**

It is therefore, most respectfully prayed that the above said filed proposal which are in consonance with the law and being geographically compact, in the interest of public convenience and ensuring homogeneity of the area and to attach the legitimacy with the elected representatives of the parliament and provincial assemblies may kindly be accepted, in the best interest of justice.

*[Handwritten signature]* Applicant  
Ch. Muhammad Kamran Ali Khan  
S/o Ch. Muhammad Aslam Khan  
r/o Village and PO: Chakri Tehsil  
and District Rawalpindi

Through

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