

**BEFORE THE HONOURABLE ELECTION
COMMISSION OF PAKISTAN**

Representation No. _____/2018

Raja Shahzad Younas S/o Raja Muhammad Younas R/o Sagri Kalan
P/o Khas, Tehsil and District Rawalpindi.

...Petitioner

Versus

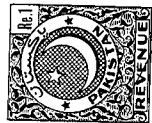
Delimitation officer, National Assembly (NA- 57, 58, 59),
Rawalpindi.

...Respondent

**REPRESENTATION U/S 21(2) OF ELECTION ACT 2017,
AGAINST DRAFT LIST OF CONSTITUENCIES PUBLISHED
BY ELECTION COMMISSION OF PAKISTAN IN
PROVINCE OF PUNJAB INCLUDING NA-57,
RAWALPINDI I, NA-58 RAWALPINDI II, NA-59
RAWALPINDI III.**

Respectfully Sheweth,

1. That brief facts leading the instant petition are that the petitioner is resident of union Council Sagri (111) and has contested election for the seat of Chairman and is elected as Chairman of Union Council Sagri, coming in the territory of District Council Rawalpindi.
2. That the petitioner is a law abiding citizen and enjoying fundamental rights guaranteed by the constitution of Islamic Republic of Pakistan.
3. That the petitioner is registered voter member of National Assembly Old NA-52 and new NA-58.
4. That the election commission of Pakistan vide using its powers guaranteed by constitution of Islamic Republic of Pakistan made delimitation of the constituencies of National Assembly and issued draft list of constituencies for the area of National Assembly of Punjab and published draft list of constituencies.

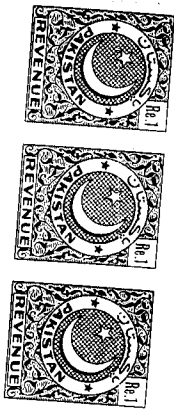


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5. That feeling aggrieved from the said delimitation the petitioner is filing the instant representation on the following ground, amongst others:

GROUNDS

- i. That the delimitation officer while making delimitations of NA-57, 58 & 59 ignored the geographically compact areas and physical features.
- ii. That existing boundaries of administrative units, facilities of communication and public convenience and other cognate factor to ensure homogeneity in the creation of constituencies was also overlooked by the delimitation officers.
- iii. That the delimitation office has not hold inquiries summoned witnesses ,record^{ed} evidence and has prepared draft list of constituencies in a hasty and cursory manners without application of mind.
- iv. That the delimitation officer while sitting in office has only taken into account only the Qanoon Ghoi Halqa (QHs) and patwar circles (PCs) and not taken into account the geographical compact areas and physical feature.
- v. That the delimitation of the constituencies is against the constitution and fundamental rights



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of the inhabitants of the *constituencies* and also against the relevant laws.



- vi. That the proposal of the constituencies for NA-57 (old NA-50), NA 58 (old NA-51) & 59 (old NA-52) is as under:

NA-57 Rawalpindi I (old NA-50)

Draft list of constituency Proposed constituency

a) Kotli Sattian Tehsil	Tehsil Murree	2,33,471/-
b) Murree Tehsil	Tehsil Kotli Sattian	1,19,312
c) Kahuta Tehsil	Tehsil kahuta	2,20,576/-
d) Kallar Syedan Tehsil, of District Rawalpindi.	Tehsil Kallar Syedan excluding MC Kallar Syedan	1,62,938/-
Total: 7,90,632/-	PC Dodocha	82,72
	PC Dodhar Najjar	6375
	PC Aban Chak	13013
	PC Punjgran	11654
	Total:	77,56,11/-

NA-58 Rawalpindi II (old NA-51)

Draft list of constituency Proposed constituency

a) Gujar Khan Tehsil	Tehsil Gujar Khan	678503/-
b) Sagri QH of Rawalpindi Tehsil	MC Kallar Syedan	54335/-
Total: 776,450/-	PC Mujahid Gangal	4129
	PC Pakwal	2406
	PC Mari Danishmandan	5225
	PC Kalri	4018
	PC Basali	7838
	PC Jabbar Darwaish	4540
	PC Harakka	3159
	Total:	7,64,153/-

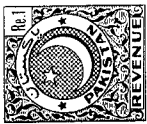
NA-59 Rawalpindi III (old NA-52)

Draft list of constituency Proposed constituency

a: The following QHs of Rawalpindi Tehsil	QH Banda	18018
i) Adhwal	QH Adhwal	76202
ii) Banda	QH Gorakhpur	39143
iii) Basali	QH Sehal	35545
iv) Chakri	PC Banda Nagyal	17392
v) Gorakhpur	PC Dhalla	5597
vi) Sehal	PC Adyala	5459
vii) Rawalpindi	PC Khasala	4061
	PC Jarahi	79927
	PC Morgah	37933
	PC Dhamyal	37894

Q

	PC Lakhan I 52814 PC Lakhan II 90494 PC Kotha Kalan 84035
b: The following PCs of Chaklala QHs	PC Dhama Syedan 38814 PC Bagga Sheikhan 5252 PC Karpal 8046
i) Jarahi ii) Morgah iii) Topi iv) Lakhan I v) Lakhan II vi) Kotha Kalan vi) Dhamyal vii) Dhama of Rawalpindi District	PC Chak Khas 9319 PC Kalyam Mughal 8520 PC Mankiala 5282 PC Sagri 19055 PC Hoshyal 3861 PC Katarian 3585 PC Meelam 2439 PC Pind Jatla 3695 PC Jhata Hathyal 5893 PC Kotla 3411 PC Gahi Syedan 2572 PC Gorakhpur 7703 PC Chahan 9728 PC Karahi 3073 PC Korar 3432 PC Mial 3058 PC Paryal 6607 PC Soroba 3744 PC Chakri 4480 PC Dairi 8380 PC Dadambur 3972 PC Gheela Kalan 3587
Total: 761,981/-	Total: 7,62022/-



vii. That the petitioner has purposed the above said constituencies NA-57,58 & 59 and counsel of the petitioner will agitate and assist the Honourable election commission along with all the relevant maps and concerned documents at the time of arguments.

viii. That the purposed constituencies are geographically compact areas physical features and existing boundaries are also convenient for the public.

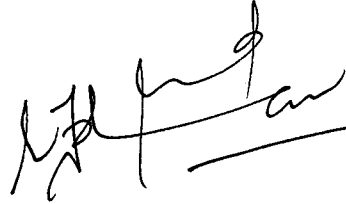
In the circumstance it is therefore respectfully prayed that the instant representation may kindly be accepted and the proposed constituencies for na-57,58 & 59 may kindly be given consideration, waitage and may kindly be included in draft list of constituencies

and already issued draft list of constituencies may kindly be amended, altered and modified in the larger interest of justice.

Any other relief, which this Honourable Commission may deem just and proper may also be awarded.

Petitioner *Shahzad*
Raja Shahzad Younas S/o
Raja Muhammad Younas R/o
Sagri Kalan P/o Khas, Tehsil
and District Rawalpindi.
Cell: 0300-5556458

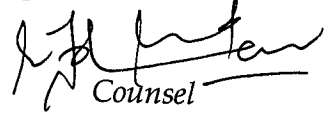
Through:



RAJA FAHEEM AHMED MINHAS
Advocate High Court.
Cell: 0300-5100366

Certificate:-
03-04-2018

Certified that this is the first representation being filed before this Honourable Commission on the subject, and nothing is pending before the Honourable High Court and Supreme Court of Pakistan.


Counsel