

V

The Secretary,  
Election Commission of Pakistan,  
Election Commission Secretariat,  
G-5/2, Constitution Avenue,  
Islamabad.

**REPRESENTATION AGAINST THE DELIMITATION OF  
CONSTITUENCY NA-61 (OLD NA-54) OF ISLAMABAD CAPITAL  
TERRITORY UNDER SECTION 21(3) OF THE ELECTION ACT 2017  
READ WITH RULE 12 OF THE ELECTION RULES 2017**

Respected Sir,

1. The Petitioner is a registered voter in (Constituency NA 61, Rawalpindi) and his name appears in the Electoral List pertaining to the Electoral Area Dhoke Gujran Tehsil and District Rawalpindi at serial No. 35.

A copy of the CNIC and extract of the Electoral List of the area is attached as Annex "A" and "B" respectively.

2. The Petitioner seeks to challenge the preliminary report published by the Election Commission of Pakistan pertaining to the National Assembly constituency of Rawalpindi Punjab. The map of the Preliminary Report, which was provided by the Election Commission, is attached herewith.

A copy of map is attached as Annex "C".

3. The preliminary delimitation of constituency is in gross violation of laws, rules, procedure principles and provisions as well as sections laid down in Election Act 2017, the same is liable to be rectified to the extent of prayer.

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4. The Constituency NA 61, Rawalpindi comprises of PP-17 and PP-18. The existing population of PP-17 and PP-18 is 4,08,119 and 4,10,068 respectively.
  5. It is submitted that Charge No. 7 of Rawalpindi Cantonment has 05 Circles. Circle No. 01, 03 and 05 have been included in PP-17, while Circle No. 02 and 05 have been included in PP-18. It is pertinent to mention here that Charge No. 07 as a whole is part of a defined Revenue boundary of Mouza Seham. Moreover, Charge No. 07 as a whole is part of Ward No. 10 of Cantonment Board Rawalpindi.
  6. According to proposed delimitation of PP-17 and PP-18 around 90% part of Mouza Seham (Charge No. 07) falls in PP-17 while 10% part Mouza Seham (Charge No. 07) falls in PP-18.
  7. Charge No. 07 (Mouza Seham) is a compact part of Ward No. 10 and have same social benefits like, water supply, sewerage system etc. so this may be included in one constituency i.e. PP for maximum welfare of local inhabitants and over all national interest.
  8. Charge No. 11 of Rawalpindi Municipal Corporation (Dhoke Ratta) has physical links with Saddar Bazar, Gawakmandi, Rawalpindi Cantonment. Therefore, Dhoke Ratta may be included in PP-18 alongwith its adjoining areas like Saddar and Gawalmandi. However, it has been included in PP-17 according to proposed plan of delimitation.
  9. Dhoke Ratta has a raod access and sewerage system through Saddar, Gawalmandi (PP-18) it is therefore, requested to include Dhoke Ratta in PP-18 rather than in PP-17 as proposed.
  10. The Petitioner suggests the following proposal for your kind consideration which will rectify the situation once for all.
    - a. Circle No. 02 and 05 having population of 95,063 may be adjusted/shifted from PP-18 to PP-17;

b. Charge No. 11 of Rawalpindi Municipal Corporation (Dhoke Ratta) having population of 67,373 may be adjusted/shifted from PP-17 to PP-18;

c. To equalize the population of PP-17 and PP-18, Circle No. 01, 02 and 03 of Charge No. 02 Rawalpindi Cantonment having population of 28,442 may be adjusted/shifted from PP-17 to PP-18.

11. The total cumulative effect of accepting the above suggestions will balance the population in both the areas as follows:

Area	Existing population	Proposed population
PP-17	4,08,119	4,07,367
PP-18	4,10,068	4,10,815


Prayer

It is, therefore, urged that the delimitation of NA-61 may be effected as suggested in paragraph 10 and 11 above, in the larger interest of the inhabitants of the area and justice.

Petitioner

  
CH. DILSHAD ELLAHI  
Lumberdar  
Dhoke Gujran (SEHAM)  
Rawalpindi

Through

  
(Barrister Saeed ur Rehman Khan)  
Advocate Supreme Court