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The secretary
Election Commission of Pakistan
Constitution Avenue Islamabad.

Subject:

REPRESENTATION / objections UNDER SECTION 21(3)
OF THE ELECTION COMMISSION ACT 2017 READ WITH RULE
12 OF ELECTION RULES 2017 AND OTHER ENABLING
PROVISIONS OF LAW FOR AMENDMENT ALTERATION OF
DELIMITATION OF CONSTITUENCIES OF NA-68, NA-69,
NA-70 & NA-71 OF DISTRICT GUJRAT

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Respected sir,

1. That applicant took part in the general election 2013 as a member of national assembly from the previous constituency NA-107 district Gujrat and applicant is a bona fide voter of NA-71 district Gujrat. (voter certificate of applicant is attached with the instant representation)
2. That vide notification no. F8(3)/2018 Elc-1 dated 5th March 2018, honourable election commission was pleased to publish, in official gazette, for information of general public, preliminary report and the list of constituencies in respect of national assembly and provincial assemblies.
3. That applicant being aggrieved of notification no. F8(3)/2018 Elc-1 dated 5th March 2018 seeks amendments of delimitation of constituencies NA-68, NA-69, NA-70 & NA-71 of district Gujrat inter alia on the following :

GROUNDS

1. That delimitations have not been made in accordance with the manner, provided by rule 10(5) of the election rules 2017 according to which delimitation of the constituencies of the assembly shall start

from the northern end of District and then proceed clockwise in a zigzag manner keeping in view population of the constituency. The northern end of district Gujrat is Tehsil Sara-i-Alamgeer, from where the delimitation should have been commenced. But delimitation has been initiated from eastern end of District i.e Tanda. So it is vivid violation of rule 10(5) of the election rules 2017.

2. That the new delimitations as published in preliminary report and preliminary list defy the provisions of section 20 of the election act 2017, and the rule 10 and 12 of election rules 2017.
3. That the constituencies no. NA-68, NA-69, NA-70 & NA-71 have been delimitation in utter disregard to distribution of population in geographical compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.
4. That the constituencies as proposed by election commission of Pakistan are not geographical compact or contiguous. The constituency NA-71 has been lingered on up to 90 kilometers.
5. That applicant prepared a proposed map and proposed constituencies i.e NA-68, NA-69, NA-70 & NA-71 of district Gujrat as per law and rules keeping in view equal distribution of population, compactness and public convenience, which are as under

NA-71 should be named as NA-68, which should be comprised of

i.	Tehsil Sara-i-Alamgeer	247333
ii.	Kotla QH except PC(Kotla Arab Ali Khan)	33327
iii.	Kharian 2 QH	73589
iv.	Kharian Cantonment	48118
v.	Kharian Municipal committee	39301
vi.	Kharian 1 QH	81585
vii.	Lala Musa 2 QH except PC Chaksakandar no53	61346
viii.	Sabor 1 QH	53684
ix.	Sabor 2 QH	42280
	TOTAL	680563

NA-68 should be named as NA-69, which should be comprised of

I.	PC of Kotla 1 QH(Kotla Arab Ali Khan)	22813
II.	Kotla 2 QH	57524
III.	Pero Shah 1 QH	75224
IV.	Tanda 1 QH	72177
V.	Tanda 2 QH	89295

VI. Pero Shah 2 QH	84648
VII. Jalapur Jattan 2 QH	43219
VIII. Jalapur Jattan 1 QH	65283
IX. Jalapur Jattan Municipal Committee	96212
X. Daulat Nagar 1 QH	79323
XI. Daulat Nagar 2 QH	56003
Total	741721

NA-69 should be named as NA-70, which should be comprised of

i. Gujrat Municipal Corporation	390533
ii. Gujrat 1 QH	84104
iii. Gujrat 2 QH	35740
iv. Shadiwal town committee	23233
v. Kunjah 1 QH	65845
vi. Kunjah Municipal Committee	32648
vii. Kunjah 2 QH	62999
Total	695102

NA-70 should be named as NA-71, which should be comprised of

i. Dinga 2 QH	74716
ii. Dinga Minicipal Committee	50802
iii. Dinga 1 QH	43628
iv. Jaura 2 QH	56798
v. Jaura 1 QH	71511
vi. PC (Chak Sakandar no. 53) of Lala Musa QH	25977
vii. Municipal Committee Lala Musa	91542
viii. Lala Musa 1 QH	82371
ix. Dewana 1 QH	77139
x. Dewana 2 QH	64240
Total	638724

(copy of proposed Map is attached with the instant presentation)

6. That the faulty, illegal and unlawful delimitation conducted by the election commission has disturbed the uniformity and compactness of the national constituencies.
7. That the constituency no. PP-71, has been delimitation in odd shaped.
8. That the appellatant humbly seeks permission of this Honourable authority for raising additional grounds at the stage of arguments.

P R A Y E R

In aforementioned circumstances, it is humbly prayed that the instant representation/ objection petition

may kindly be accepted and impugned delimitation may kindly be set aside.

Any other relief which this Honourable authority deems fit and proper and which has inadvertently not been prayed for may kindly also be granted.

Applicant

Muhammad Ilyas Chaudhary
Son of Chaudhary Gull Nawaz Khan M.1/2
Resident of house no.352
Mohalla Nai Abadi
Tehsil Sara-i-Alamgeer
Gujrat

Through:

ASIF NAZIR MEHR
Advocate High Court

DATED: 03-04-20168

CERTIFICATE:

Certified as per instructions that this is the first representation/objection petition on the subject in this Honourable Authority.

ADVOCATE