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

Petition.NO _____ 2018

Petitioner

Syed Abbas Ali Shah ^{s/o} Qasim Ali Shah R/O Jhanday Wal Tehsil and District Gujrat.

Preliminary Constituency

NA-70 Gujrat- III

Representation

Under Section 21 (3) Of Elections Act 2017 read with Rule 12 Of Election Rules 2017 For Amendment/ Changes/ Modifications In Preliminary Delimitation Constituency Of NA-70 Gujrat, III Published In The Official Gazette By The Election Commission Of Pakistan

Respectfully Sheweth:-

Facts

- 1) That the petitioner is registered voter and his name is appeared in voters list of Jhanday Wal, Sr. No 223 falling in preliminary constituency NA-70 Gujrat- III.
- 2) That District Gujrat has been divided into 4 seats of National Assembly. In Constituency-NA-70-Gujrat-III the following territorial Units/areas are included,
 - i) **The whole Municipal Committee Lala Musa.**
 - ii) **The whole Dinga Municipal Committee.**
 - iii) **Dewana Qanoongo Halqa (G.H) excluding Hariwala (PC).**
 - iv) **Qanungo Halqas, Dewana I+II of Tehsil Gujrat excluding Majra (P.C), Qanungo Halqas Joura I, Jora II, Dinga I, Dinga II and Lala Musa.**
- 3) The petitioner is aggrieved of Preliminary Delimitation Constituency-NA 70-Gujrat-III structured without his participation/ knowledge which needs certain changes/ modification on the following amongst others.

Grounds

a) That the Delimitation of the New Constituency in issue is not in conformity and in line with the Provisions of Law envisaged and contemplated in Section 20 of the Elections Act 2017 and Rules 10 and 12 of Election Rules 2017 which occasioned inconveniencies problems not only to the Peoples of Halqa in moot but also to the peoples of the adjacent Constituency N.A-71 Gujrat-(iv).

b) Proposals For Changes/Modifications

The following areas/Patwar Circle/Q.H are required to be excluded from constituency in question, which have been highlighted in **yellow colour** in the map, and requested to be included in constituency NA 71-Gujrat-(iv).

Names	Population
Amra Kalan (PC)	11322
Punjan Shahana (PC)	2690
Kohri (PC)	4328
Noor Jamal (PC)	7105
Randher (PC)	5492
Longo (PC)	3726
Bido (PC)	4511
Rajo (C.P.)	3526
Dahu	2618
Mirza Tahir	5436
Total Population	50754

In place of the above (PC's) the following areas/PC falling in NA 71 shown in green colour needed to be included in NA 70 Gujrat.

Names	Population
Bhadar (PC)	7087
Borch-1 (PC)	8727
Borch -II (PC)	7237
Suembri (PC)	8675
Langrial PC)	10554
Bazurg Wal PC)	8916
Total Population	51196

(C) Reasons/Grounds Of Changes / Modifications

- 1) That the aforesaid referred Patwar Circles (Amra Kalan, Punjan Shahana, Khori, Noor Jamal, Randher, Longo, Bido, Rajo, Dahu and Mirza Tahir) shown in constituency NA-70 in yellow colour in the map are adjacent to and geographically connected with N.A- 71 intervening hills from N.A-71 with the said PC's of N.A-70.
- 2) The said PC's also adjacent to Kharian (Q.G) situated in N.A-71 and the said (Q.G) also connected with Gheeka (Q.G) of N.A- 71.
- 3) If Bhader (PC), Burch-1 (PC), Burch-II (PC), Suemari (PC) shown in green colour in the map included in constituency N.A- 71 be included in N.A- 70 which is geographically connected with the other Halqa of NA 70.
- 4) It is also pointed out that Suembari (PC) and Bhadar (PC) was part of NA 106 (old). Now N.A-70 but included in N.A-71.
- 5) If the proposed changes/modifications are made & accepted, the ratio of population of both the constituencies will be almost equal within the scope of variation of 10% permitted by law.

- 6) The suggested amendments in the said constituencies will also solved the problems of communication of the peoples.
- 7) The suggested areas (shown in yellow colour) for inclusion in NA 71 included in NA 70 are situated/connected with the boundry of district Mandi Bahaul Din but geographically connected with N.A-71 through hill known as Rakh Babi Sarkar (part of NA 71). But the said PC's/ areas have been included in N.A-70 without any logic in violation of principle of compatability rather it has complete deviation of principles of delimitation provided in section 20 of the Election Act 2017.
- 8) That in the same manner 6 areas/ PC's shown in **green colour** in map presently included in N.A-71 (fall in saboor- IIQ H) and Buzurg wal (PC) have absolutely cognate and geographical compatibility with NA 70 and these are connected with NA 70 from boundary of Kamla Bhand (PC).
- 9) If the aforesaid suggestions/ proposals are given weight the population of both the constituencies (N.A-70 & 71) will become more rational and almost equal which is indicative from the following table:-

Population Of Prevailing Constituencies

<u>N.A-70- Gujrat-III</u>	<u>NA 71-Gujrat - (iv)</u>
677072	699554

After Changes/Modifications In The Constiencies

<u>N.A-70-Gujrat III</u>	<u>N.A-71-Gujrat - (iv)</u>
677514	699112

The applicant has no objection regarding the delimitation of remaining constituencies National Assembly of district Gujrat.

Prayer

In face of the above narrated facts, and circumstances and law on the subject it is respectfully submitted that the representation may kindly be

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accepted and the changes/ amendments/modifications in the Preliminary Delimitation Constituency NA-70-Gujrat III Published in official Guazzet by Election Commission of Pakistan may kindly be made to delimit. It to meet the requirement of law mandated in Section 20 of The Elections Act 2017 read with Rule 12 of Elections Rule 2017 to foster the cause of justice.

Any other appropriate relief, as an alternative may be granted.

Petitioner

Through:

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