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

Usman Javed son of Javed Ahmed Resident of Chak No. 113 JB, Tehsil Saddar, District  
Faisalabad. CNIC: 33100-3677488-9

.....Petitioner

**REPRESENTATION UNDER SECTION 21 OF THE ELECTIONS ACT 2017**  
**READ WITH RULE 12 OF THE ELECTION RULES 2017 REGARDING**  
**DELIMITATION OF CONSTITUENCY: NA 101 FAISALABAD**

*Respectfully sheweth:*

1. That the Petitioner is a registered voter enrolled on the electoral rolls of the constituency **NA 101 Faisalabad-1** (*previously NA 75 Faisalabad-1*) (hereinafter referred to as "**the Petitioner's Constituency**").
2. That the honourable Election Commission of Pakistan (**ECP**) in pursuance of Article 222(b) of the Constitution of Pakistan, Section 21 of the Elections Act 2017 (**the Act**) read with Rule 11 of the Election Rules 2017 (**the Rules**) published the preliminary report and list of constituencies in respect of National Assembly and the Provincial Assemblies vide notification No. **F.8(3)/2018-Elec-I** dated **05-03-2018** (**the Notification**). Whereby preliminary proposals forwarded to the ECP were made public. Preliminary Proposal in respect of Faisalabad District is attached herewith.
3. That population for NA 101 Faisalabad 1 as per preliminary proposal has been fixed at is **787068**.
4. That the **Patwar Circle 113 JB PC** has been excluded from NA 101 and has been placed under constituency NA 106.

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5. That the Petitioner is filing the instant representation with regard to delimitation of the Petitioner's Constituency on the following grounds and with the following recommendations.

### GROUNDS

1. That at the outset it may be noted that the Delimitation Committee has not abided by relevant provisions i.e. Rule 10 of the Rules whereby delimitation ought to have been started from northern end of the district and then proceeded clock-wise in zigzag manner. In the instant case delimitation did start from Chak Jhumra Tehsil (northern end) and then extends clock-wise towards Jarranwala Tehsil. However, in addition to Chak Jhumra Tesil, Patwar Circles (PCs) 190 RB PC and 197 RB PC have been added from QH Gatwala, Tehsil Saddar whereas 113 JB PC from the same QH and Tehsil has been left out of NA 101; the Petitioner's Constituency. As per propriety and other cognate factors, Patwar Circle 113 JB PC ought to have been added to NA 101 and not NA 106.
2. That in the Provincial Assembly constituency falling under NA 101 i.e PP 97, the Patwar Circle 113 JB PC falls within PP 97 along-with other PCs of Chak Jhumra Tehsil. However it is odd to see that the same PC has been excluded from the National Assembly Constituency and has instead been placed in NA 106.
3. That the Petitioner's village 113 JB falls in the Patwar Circle 113 JB PC which has a population of **11,641/-**. That the Petitioner's *biradri* (Hoshiarpuria Biradri) resides in only three Patwar Circles of QH Gatwala and it may be noted that these three PCs have been divided into two different NA constituencies of Faisalabad.
4. That if the PC 113 JB is added to NA 101 and excluded from NA 106, the population of both these constituencies shall still remain as per quota and no irregularity or illegality will be caused. Neither will there be any material change caused in the other constituency i.e. NA 106 since no new area is being added to it.

### **RECOMMENDATION**

1. On basis of the above mentioned grounds it is most humbly prayed that delimitation done for NA 101 Faisalabad 1 as per preliminary proposals may kindly be amended/alterd to include Patwar Circle 113 JB PC, QH Gatwala, Tehsil Saddar, District Faisalabad in NA 101 and same may be excluded from NA 106 as proposed in the proposed map attached herewith.

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2. That as per current preliminary proposals the **population of constituency NA 101 is 787068**. After addition of Patwar Circle 113 JB PC of 11,641, population of NA 101 will come to;

$$787068+11,641=798709$$

which is well in accordance with quota and does not exceed more than 10% and is thus in accordance with relevant rules and laws.

3. NA 106 population as per preliminary proposal is at **777621**. After exclusion of PC 113 JB from NA 106, population of NA 106 will be;

$$777621-11641=765980$$

which is in accordance with quota and does not violate any of the relevant rules and laws.

4. Thus 113 JB PC comprising of the Chak Nos: 105 JB, 111 JB and 113 JB, QH Gatwala, Tehsil Saddar may kindly be added to constituency NA 101 Faisalabad-1 as proposed in the proposed Map attached herewith.

#### PRAYER

In view of the above, it is respectfully prayed that this Representation Petition may kindly be accepted/allowed and preliminary delimitation for **NA 101 and NA 106** may kindly be altered/amended as per the recommendations given herein above in this Representation.

Any other relief deemed appropriate in the circumstances of the case may also kindly be granted.



PETITIONER

(IN PERSON)