# BEFORE THE ELECTION COMMISSION OF PAKISTAN THROUGH SECRETARY ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

REPRESENTATION UNDER RULE 12 OF CONDUCT OF ELECTION RULES 2017, AGAINST THE PUBLICATION OF PRELIMINARY PROPOSAL REGARDING NATIONAL CONSTITUENCIES ASSEMBLY OF DISTRICT FAISALABAD NA-103 ΤO NA-105, ON BEHALF OF MUHAMMAD NASEEM SARWAR KHAN SON OF SARWAR KHAN, RESIDENT/VOTER OF NO.1, HOUSE NO.P-47 SAMUNDARI, DISTRICT FAISALABAD.

Respectfully sheweth;

1. Brief facts of the matter are that the petitioner is a voter enrolled in electoral role for Municipal Committee Samundari which falls in NA-104. Petitioner is eligible to file the instant representation to raise the objection against the proposed delimitation of NA-103 to NA-105 of District Faisalabad.

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while making the delimitation That certain areas of NA-103 to NA-105 wrongly excluded and included in each other, whereby geographical compactness and other physical features were not kept in view particularly the ways of communication and canal irrigation system were also not given importance beside not maintaining background of the previous history of delimitation. Even the map prepared during delimitation process is also crafted wrongly in violation of Section 20 of Election Act 2017. The petitioner in order to get the same corrected make the following objections, to maintain geographical compactness of the area and to sustain the existing boundaries of the proposed delimitation:-

# **GROUNDS FOR OBJECTIONS**

a. That previously PCs from Gharr Qanoongoii.e. PC 455/GB (7115), 456/GB (4084),

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541/GB(10106), 453/GB(4667), 619/GB (3728), 620/GB(4375), 621/GB (3240), 622/GB (3179), Gharr (17060), Shadi (1272), Sheraza 616/GB (2779), 618/GB(1491), Khurda Neka Wasli (208), Nika Wasli (79), Sheraza (2219), Shadi (4375) total population 63896 were part of NA-78 which constituency was mainly consists of Tehsil Tandlianwala and all the above described PCs are part of Tehsil Tandlianwala, but through the proposed delimitation these PCs are shown to be included in NA-104 instead of NA-103 the new name of old NA-78 of Tandlianwala.

PCs are to deal with the administration offices of Tandlianwala Tehsil and if the same is included with the national assembly seat of Samundari the people of

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these PCs have to travel 25-KMs. The inclusion of these PCs with NA-104 is neither beneficial for the people of these PCs nor the same is fulfilling the requirement of Section 20 of Election Act 2017.

That PCs of Qanoongoi Giddar Pindi i.e. C. Chak No.44/GB (5143), 46/GB (4879), 43/GB (3380), 47/GB (6609), 48/GB (5818), 49/GB (5774) having population of 31603 and PC of Qanoongoi Salooni Jhaal i.e. 50/GB (4438), 51/GB(4649), 52/GB (4213), 228/GB(5245), 134/GB(2970), 135/GB(1209), 136/GB(5775), 372/GB(3332), 373/GB(4535), 388/GB(4146), 387/GB(3546), 386/GB(850) total population 44908, total population of these PCs of both Qanoongoi 76511 were illegally excluded from NA-104 (old NA-79) and included in NA-105 (old NA-80). These PCs were of Tehsil Samundari and



these were illegally detached from NA-104 seat meant for Samundari Tehsil and were included in NA-105 the seat which is mainly part of Tehsil Saddar Faisalabad.

- d. That the population of NA-105 is now mentioned as 8,09,773, if these PCs were excluded from NA-105 and included with NA-104 the remaining population of NA-105 would become 7,37,210.
- e. That if the PCs of Qanoongoi Garh were substituted with the PC of Giddar Pindi and Salooni Jhaal Qanoongoies mentioned in ground-(c) taken out of NA-105, the population of NA-104 would be 7,73,330 and the PCs of Garh Qanoongoi detailed above in ground-(a) if added in NA-103 the population of NA-103 would be 8,54,804/-. If from said constituency Kanian qanoongoi taken out and included in NA-105 the remaining final population

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of NA-103 would be 7,75,695 and the final population of NA-105 would become 8,12,371.

f. That if the above described formula is adopted it will bring geographical compactness of the area of these constituencies while maintain physical features, ways of communication and system, beside being irrigation maintained the administrative boundaries of these units which are pre-requisite of Section 20 of Election Act therefore, notification regarding NA-103 to NA-105 is required to be modified in the manner propose above.

In view of the above submissions, it is, therefore, most respectfully prayed that the PCs mentioned in PC 455/GB (7115), 456/GB (4084), 541/GB(10106), 453/GB(4667), 619/GB (3728), 620/GB(4375), 621/GB (3240), 622/GB (3179), Gharr (17060), Shadi (1272), Sheraza 616/GB (2779), 618/GB(1491), Khurda Neka Wasli (208), Nika Wasli (79), Sheraza (2219), Shadi (4375) total population 63896 may kindly be excluded from NA-104 and the same

may kindly be included with NA-103 and the PCs of Qanoongoi Salooni Jhaal and Giddar Pindi i.e. Chak No.44/GB (5143), 46/GB (4879), 43/GB (3380), 47/GB (6609), 48/GB (5818), 49/GB (5774), 50/GB (4438), 52/GB (4213), 51/GB(4649), 228/GB(5245), 134/GB(2970), 135/GB(1209), 136/GB(5775), 372/GB(3332), 373/GB(4535), 388/GB(4146), 387/GB(3546), 386/GB(850) total population 76511 be taken out from NA-105 and the same may kindly be added in NA-104 and Qanoongoi Kanian may kindly be taken out from

#### **PETITIONER**

MUHAMMAD NASEEM SARWAR KHAN SON OF SARWAR KHAN, RESIDENT/VOTER OF WARD NO.1, HOUSE NO.P-47 SAMUNDARI, DISTRICT FAISALABAD

NA-103 and added in NA-105.

through

### M.A. GHAFFAR-UL-HAQ

Advocate Supreme Court C.C. No.PLH-14539

## A. H. LAW ASSOCIATES

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Dated: <u>02.04.2018</u>