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BEFORE THE HONORABLE SECRETARY ELECTION
COMMISSION OF PAKISTAN, ISLAMABAD.

Farooq Ahmad son of Ghulam Fareed, resident of DakKhanaKhas, Chak
Number 388 GB, Tehsil Samundari, District Faisalabad. ^{CNIC NO#} 33105-6584573-7

Block Code # 154040505

Petitioner

Srsla No# 648

Constituency: Chak 388 جے ڈی Dolehi Majra, Samundari,
Faisalabad.

MEMORANDUM/ REPRESENTATION UNDER RULE 12 OF THE
ELECTION RULES 2017 (RULES) READ WITH SECTIONS 20 AND
21 OF THE ELECTIONS ACT 2017 (ACT) ALONG WITH ALL
ENABLING PROVISIONS IN RESPECT OF PRELIMINARY
DELIMITATIONS OF NATIONAL ASSEMBLY CONSTITUTENCY
N.A. 105, DISTRICT FAISALABAD.

It is most respectfully submitted through this memorandum:

1. That the Petitioner is resident at the address mentioned above and is a registered voter.
2. That the preliminary delimitations have not been done in accordance with the sound principles of delimitation and have also not been done in keeping with the requirements of Section 20 of the Act 2017.
3. That if the current proposal of delimitation is maintained it will be in violation of the principles provided in Section 20 of the Act 2017 which provides as follows:

*"All constituencies for general seats
shall, as far as practicable, be delimited
having regard to the distribution of*

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population in geographically 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 principles set out above, particularly with respect to fair distribution of population in each constituency will be violated if the proposed delimitation is maintained.
5. That in addition if the proposed delimitation is maintained it will further be in disregard to the existing boundaries of the administrative units. Particularly as the boundaries of Tehsil, Qanoongo Halqas, Patwar Circle amongst others, have not been maintained and have been violated.
6. That further the proposal is not in keeping with the considerations of existing physical features, facilities of communication, public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.
7. That accordingly for the equitable delimitation to be carried out in accordance with the mandate of law and the sound considerations for delimitation it is integral that the proposal may be revised and revisited in order to rectify the matters mentioned above.
8. That the valuable rights of the petitioner and all other citizens will be severely affected unless the proposed delimitation is not corrected.
9. That Petitioner reserves the right to take additional grounds.
10. That in proposal the constituencies included are Chak Nos 042GB, 551GB, 228GB, 50GB, ~~388GB~~, 438GB and 186GB and the excluded

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Constituencies - are ^{CHR NO} 4534B, 5404B, 4584B, 4564B
6204B, and 4554B. for

PRAYER

It is most respectfully prayed that the proposed delimitation may be struck down and set aside and may be rectified in keeping the provisions of law and the sound and equitable principles for delimitation in order to ensure lawful and fair delimitation of constituencies.



Petitioner

Through Counsel



Fahim Ashraf
Advocate High Court