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**IN THE HONOURABLE ELECTION COMMISSION**  
**OF PAKISTAN, ISLAMABAD**

Sardar Muhammad Irfan Dogar S/o Sardar Makhdoom  
Hussain Dogar, R/o Kakkar Gil, Tehsil and District  
Sheikhupura, Cell No. 0301-8468684

**REPRESENTATION UNDER SECTION 21 (3) OF**  
**ELECTION ACT, 2017, READ WITH RULE 12 OF ELECTION**  
**RULES, 2017, REGARDING ALTERATION/MODIFICATION**  
**IN THE PRELIMINARY LIST OF CONSTITUENCY NA-122,**  
**SHEIKHUPURA-IV**

Respectfully Sheweth:-

1. That the petitioner has been elected MNA from NA-134, Skeikhupura, (now NA-122, Sheikhupura-IV), for last two times. The said constituency has been divided into 03 constituencies. The petitioner belongs to Village Kakar Gil, Tehsil and District Sheikhupura, which has also been excluded from NA-122, Sheikhupura-IV.
2. That as per Notification No. F8(3)/2018-Elc-I, dated 05.03.2018, the whole constituencies have been changed and divided into 03 National Assembly Constituencies, without his knowledge in Preliminary Report of the list of constituencies of Provincial as well as National Assemblies.

3. That the undersigned is aggrieved by the new delimitation and seeks proposed delimitation in NA-121 & 122, without brining major changes in both the constituencies of Sheikhupura District under following amongst others:-

**GROUND:-**

- a) That the delimitation as published in Preliminary Report and Preliminary List is against the Provisions of Section 20 of the Election Act, 2017, read with Rules 10 & 12 of Election Rules, 2017. The Section 20 of Election Act, 2017, is being reproduced as under:-

*“Principles of delimitation.— (1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of 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.*

*(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one Constituency.*

*(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.*

*(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission*

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shall record reasons thereof in the delimitation order.”

- b) That while formulating the constituencies, the principle laid down in the above referred section of the Act *ibid*, have not been followed at all. The principle of distribution of population in geographically compact areas has been blatantly disregarded and delimitation does not appear to have been proposed by the Delimitation Officer in lawful and bonafide exercise of the powers and duties assigned to him.
- c) That the Delimitation Officer has also flouted the principle, as given in guidelines and instructions issued by the Honourable Election Commission of Pakistan to take all possible case to keep intact the Administrative Boundaries of Tehsils and Qanungo Halqas unless it is necessary to do so to remove the glaring disparity of population amongst various constituencies of the same district. Qanungo Halqas have been demolished and disturbed to different constituencies to suit the interests of specific prospective candidates.
- d) That the constituencies as proposed by the Honourable Election Commission of Pakistan are not geographically compact or contiguous.
- e) That the petitioner has proposed map for delimitation of constituencies for National Assembly for District Shekhupura as **Annexure “A”**. Wherein the population of Qanungo Halqa Ajanyawala consists of 79053 population and following Patwar Circles of Qanungo Halqa of Jandyala Sher Khan are as under:-

- (1) Waran, consists of 18533 population
- (2) Kalokay, consists of 18356 population
- (3) Esherkay, consists of 8944, population

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(4) Jhabran, consists of 28522, population

Resultantly, total 153588 population have been added into the constituency in question i.e. NA-122, Sheikhpura-IV, which is quite legal and in accordance with law as per directions of Honourable Election Commission of Pakistan.

f) That the petitioner is humbly proposing that Qanungo Halqa Bhikhi, the population of following Patwar Circles are as under:-

- 1) Patwar Circle Bhikhi, consists of 41349, population
- 2) Patwar Circle Kharianwala, consists of 51605, population
- 3) Patwar Circle Mehmowali, consists of 17280, population

Resultantly, as per proposal of petitioner, the above said total 110234 population of Qanungo Halqa, Patwar Circles may be excluded from the constituency in question i.e. NA-122, Sheikhpura-IV and may be added in the constituency NA-121, Sheikhpura-III, which will be in the interest of the constituency in question and for the conduct of Elections and according to the Election Rules, 2017.

g) That as per the Notification No. F8(3)/2018-Elc-I, dated 05.03.2018, Preliminary Report and Preliminary List, the present population of the **constituency in question is 818746**, however, the population of NA-119, Sheikhpura-I, is 885990, NA-120, Sheikhpura-II, is 842144 and NA-121, Sheikhpura-III, is 913546.

h) That after the proposals proposed by the present petitioner, the population of **NA-121, Sheikhpura-III, would be 876402**. However, the population of **NA-122, Sheikhpura-IV, would be 855889**.

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- i) That it is settled law that census circle should not be divided and broken affecting the basic boundaries of the constituencies, whereas the same has been done against the procedure defined by law.
- j) That the delimitation of constituencies have not been done in accordance with the mentioned Rule 10 (5) of the Election Rules, 2017, according to which the delimitation of constituencies of an Assembly shall start from the Northern end of the District, or, as the case may be, the agency and then proceed clockwise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota. Hence, the requirement of law has been overlooked in the delimitation process done by the commission.

It is, therefore, respectfully prayed that by accepting the above said proposals of the petitioner, the necessary changes may be done the above said constituencies as per **paras "e to h" of grounds** of instant representation, in the best interest and welfare of the people of District Sheikhpura.



Petitioner  
Sardar Muhammad Irfan Dogar

Through:-



S. N. Khawer Khan  
Advocate, Supreme Court  
Lahore  
Cell No. 0300-8475086

Dated: 30.03.2018