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

Rizwan Shafqat son of Khan Shafqat Hussain Khan, R/o House NO. 1148, St. No. 82, Mohallah Kharas Sadar Bazar, Lahore Cantt. (NA-129 Lahore).

**REPRESENTATION**  
**UNDER SECTION 21(3) ELECTIONS ACT 2017 READ**  
**WITH RULE 12 OF ELECTION RULES 2017 REGARDING**  
**ALTERATIONS OR MODIFICATIONS IN THE PRELIMINARY**  
**LIST OF CONSTITUTENCY NA-129 Lahore**

Respectfully Sheweth;

1. That the petitioner is a registered voter of NA-129 Lahore and is desirous to contest from said Constituency. As per notification No. F8(3)/2018-Elc-I dated 5<sup>th</sup> March 2018, the whole constituency has been changed without the knowledge of the petitioner in preliminary report of the list of constituencies of Provincial and

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National Assembly, published by the  
Election Commission of Pakistan.

2. That the undersigned is aggrieved by the  
new delimitation and seeks proposed  
delimitation in NA-129 without bringing  
major changes in the constituency of  
Lahore District inter-alia on the  
following amongst other:-

GROUNDS

- a. That the new delimitation as published  
in preliminary report and preliminary  
list is against the provisions of  
section 20 of the Election Act, 2017  
read with rule 10 and 12 of Election  
Rules 2017.
- b. That the petitioner proposes the  
following changes in the delimitation

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for free, fair and impartial election  
and in the interest of justice:-

i. That the impugned constituency plan is unnatural and against the principle of delimitations and has been chalked down without keeping in view the geographical and physical boundaries of the said constituency.

ii. That Charge No. 18605 of Lahore Cantt Tehsil having population of 33324 may be excluded from PP-157/NA-129 and be included in PP-154/NA-127, due to the reasons that the same is located on the other side of the Canal and Railway Track having no

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direct access with the main  
constituency of PP-157 and NA-  
129.

iii. That charge 18605 is matched  
with PP-154 / NA-127 and its  
inclusion in PP-157/NA-129 seems  
to be unjustified and in  
convenient for local population  
who have no direct physical  
access to PP-157/NA-129.

iv. That the same is the situation  
with Charge No. 26017 Shalimar  
Tehsil having population 15167  
and Charge No. 26036 of same  
Tehsil having population 35731  
which are also to be excluded  
from PP-157 / NA-129 and be  
included in PP-154 / NA-127 on

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the same grounds mentioned in preceding para.

v. That Circle No. 3 of Charge No. 26034 of Shalimar Tehsil having population of 17295 is liable to be excluded from PP-158 and be included in PP-157 as the remaining circles of this charge are included in PP-157, therefore, this circle may also be shifted in PP-157 which shall not the corresponding NA-129 and as such the natural boundary of PP-157 / PP-158 shall also remain intact and will not be disturbed.

vi. That Charge No. 10609 of Lahore Cantt Tehsil having population

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of 8571 may be excluded from NA-129 and be included in NA-130. Similarly Charge No. 106~~09~~ may be excluded from PP-157 and be included in PP-159 on the reason that earlier this charge was the part and parcel of old NA-126 new NA-130 and also geographically attached with the others charges falling in the NA-130. Furthermore, this area is on the other side of the Mall Lahore which bifurcates this area from NA-129.

vii. That the proposed amendments shall not disturb the prescribed quota of the population for the constituencies, rather the same

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will facilitate the voters for casting their votes within their own area.

viii. That in result of proposed amendment, both the PPs will form a compact geographical and physical block and will also facilitate the people in casting their free, fair and in a pleasant scenario nearer to their residences.

ix. That the proposed amendments will not prejudice the case of any other voter of the constituency rather it will facilitate the voters off the constituency to cast their vote

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for conduct of free, fair and  
impartial election.

- x. That it is in the interest of  
justice and also expedient for  
the conduct of free, fair and  
impartial elections that the  
proposed amendments be allowed  
and the new constituency be  
declared with the afore referred  
proposed amendments.

**PRAYER**

In view of the submissions made above, it  
is respectfully prayed that proposed  
alterations may kindly be accepted and same may  
be kindly be revised and adjusted for the  
convenience of the population of both  
constituencies in accordance with the law and  
consequently the same may kindly be published  
in the final list of the constituency.



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Any other relief to which the  
petitioner is found entitled may also be  
awarded.

Petitioner

Through

**Muhammad Ramzan Ch.**  
**Senior Advocate**  
**Supreme Court of Pakistan**  
**C.C No. PL.H-1479**  
**Sohal Law Chambers,**  
**7-Turner, Road, Lahore.**