

BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD

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Representation No. _____/2018

Nasir Iqbal SON of Shamshad Ali Resident of Maan Singh Wala Tehsil Kot Radha Kishan, District Kasur.

SUBJECT: REPRESENTATION under Section 21(2) of the Election Act 2017, read with under Rule 12 of the Election Rules 2017 Challenging the preliminary proposal pertaining to the Delimitation of National Assembly constituencies no. 137, 138 in District Kasur.

Respected Sir,

1. That the instant Representation is being filed by Nasir Iqbal, (Hereinafter referred to as the **Applicant**), registered voter of electoral area Muhalla Bhagail Singh Wala, Kot Radha Kishan which is included in the preliminary proposal of delimitation of NA-138 Kasur-II, (year 2018) and the name of applicant is rightly mentioned in the serial no. 607 at Block Code no. 192050304 on electoral roll And is duly competent to file the instant representation under the law. Copy of vote certificate of the applicant issued by District Election Commissioner Kasur is Annexed here as **Annexure-A**.
2. That through this representation, the applicant seeks to challenge the preliminary proposal published by the Election Commission of Pakistan pertaining to the delimitation of the National Assembly constituencies' no. 137, 138 of District Kasur (Hereinafter referred to as the **Preliminary Proposal**).
3. That it is pertinent to mention here that District Kasur is now left with Four National Assembly constituencies numbering NA-137, NA-138, NA-139, and NA-140 which previously were Five in Numbers (Numbering NA-138 to NA-142).
4. That the Applicant has no objection regarding the preliminary proposal of delimitation of constituencies number NA-139 and NA-140 of District Kasur but has serious objections regarding preliminary proposal of delimitation of constituencies number NA-137 and NA-138. List of Areas/Qanoongo Halqas/Patwar circles/Census blocks included constituencies number NA-137 and NA-138 is Annexed here as **Annexure-B** and map obtained from website of Election Commission of Pakistan is Annexed here as **Annexure-B1**.

5. That the preliminary proposal of delimitation of constituencies number NA 137 and NA 138 is against the Law, Facts, Rules and Principles of delimitation laid down in The Delimitation Act 2017 and is liable to be rectified on the following amongst other:

Grounds

a) **HISTORICAL / POLITICAL BACKGROUND**

That traditionally/Historically areas of Mustafa Abad MC, Rajajang MC, and Tehsil Kot Radha Kishan was politically aligned in one constituency of National Assembly throughout the electoral history and this factor is ignored while preparing the preliminary proposal of constituencies NA-138 and NA-137. Copy of the map of delimitation of NA-138 Kasur-I held in 2002 obtained from the website of Election Commission Of Pakistan is annexed here as **Annexure-C**.

b) **THE HATHAR (ہٹھاڑ) FACTOR**

That there exist a strip of uneven/barren land from centuries, "consists of sand dunes and hummocks" which starts from the western corner of Kasur city and leads towards western side around 100km with the approximate width of 2/3km and ends near the Eastern side of Okara city which is commonly/locally known as Hathar (ہٹھاڑ). This strip of land makes the natural boundary between the Tehsil Kot Radha Kishan and Khudian MC and divided them into two distinct areas. This fact was not taken under consideration while preparing the preliminary proposal of delimitation of NA-138. The existence of this fact can be verified from the google earth image obtained from google website which is annexed here as **Annexure-D**.

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c) **FACILITIES OF COMMUNICATION**

That the facilities of communication and public convenience should be kept in view while delimiting the constituencies but these two factors are completely ignored in the preliminary proposal. In fact the areas included in the proposed delimitation of constituency NA-138 have no direct access with each other such as road links, railways network etc. rather Khudian MC is connected with Kasur city via railway/road network on the eastern side and on the western side it is connected with Chunian Tehsil, EllahAbad MC and Kangan Pur MC via Kasur-Dipal Pur road. Similarly Tehsil Kot Radha Kishan and Raja Jang MC is connected with Kasur city via direct roads but Tehsil Kot Radha Kishan and Raja Jang MC have no direct access of road or connectivity with Khudian MC.

d) **GEOGRAPHICAL COMPACTNESS**

That the constituencies should be geographically compact areas. The areas included in a constituency must be contiguous and their territorial unity should be ensured but in preliminary proposal, this instruction was not followed. It is pertinent to mention here that Rajajang MC, and Tehsil Kot Radha Kishan is geographically located in one compact block but Khudian MC has no geographical compactness with the Rajajang MC, and Tehsil Kot Radha Kishan.

e) **APPLICATION OF DIFFERENT RULE**

That the delimitation authority while preparing the preliminary proposal of The constituencies of western areas of Kasur district, i.e. Chunian, EllahAbad, Pattoki, Kanganpur and Phoolnagar, is rightly divided them into two constituencies (NA-139 & NA-140) in horizontal manner. But eastern areas i.e. Kasur city, Khudian, Mustafa bad, Raja Jang and Kot Radha Kishan are divided into two constituencies (NA-137 & NA-138) vertically without keeping in mind the geographical compactness and territorial unity and railway/road connectivity of these areas.

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PROPOSAL

6. That keeping in view the above mentioned circumstances/objections the applicant seeks to propose alternate boundaries with proportionate population for the constituency no NA-137 and NA-138 and the complete suggestions for both constituencies are annexed here as **Annexure-E & E1** and Census data of both constituencies is annexed as **Annexure-E2** here with kind perusal of the court and the map of alternate suggested boundaries of constituencies no NA-137 and NA-138 is annexed here as **Annexure-F**.

PRAYER

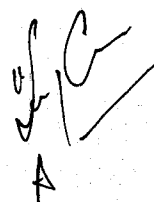
Under the circumstances above it is therefore most respectfully prayed that the alterations/modifications suggested by the applicant in the paragraph no. 6 of the instant representation may be accepted and the ips and boundaries of the constituencies no. NA-137 and NA-138. May be altered accordingly in the best interest and convenience of the people of District Kasur.

Any other relief, which this Hon'ble Court deems fit and proper, may also be awarded.



Applicant

Through



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Waqar Ahmad Malik
Advocate High Court