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M. H. Khan
31/4/18

BEFORE THE ELECTION COMMISSION OF PAKISTAN

Objection / Representation No: _____ / 2018

SHEHBAZ AHMAD KHAN, Advocate High Court, Son of Javed Ahmad Khan, Resident of Rao Khanwala, Tehsil and District Kasur [NA-138 Kasur – II].

..... Petitioner

Vs.

THE DELIMITATION COMMITTEE FOR PUNJAB, [District Kasur] Provincial Election Commission, Punjab, 10 - Court Street, Lahore.

..... Respondent

OBJECTION PETITION / REPRESENTATION

under Section 21(3) of the Election Act 2017 read with Rule 12 of the Election Rules 2017, against the Impugned Delimitation of the Constituencies of District Kasur: NA-138 Kasur – II NA-137 Kasur – I.

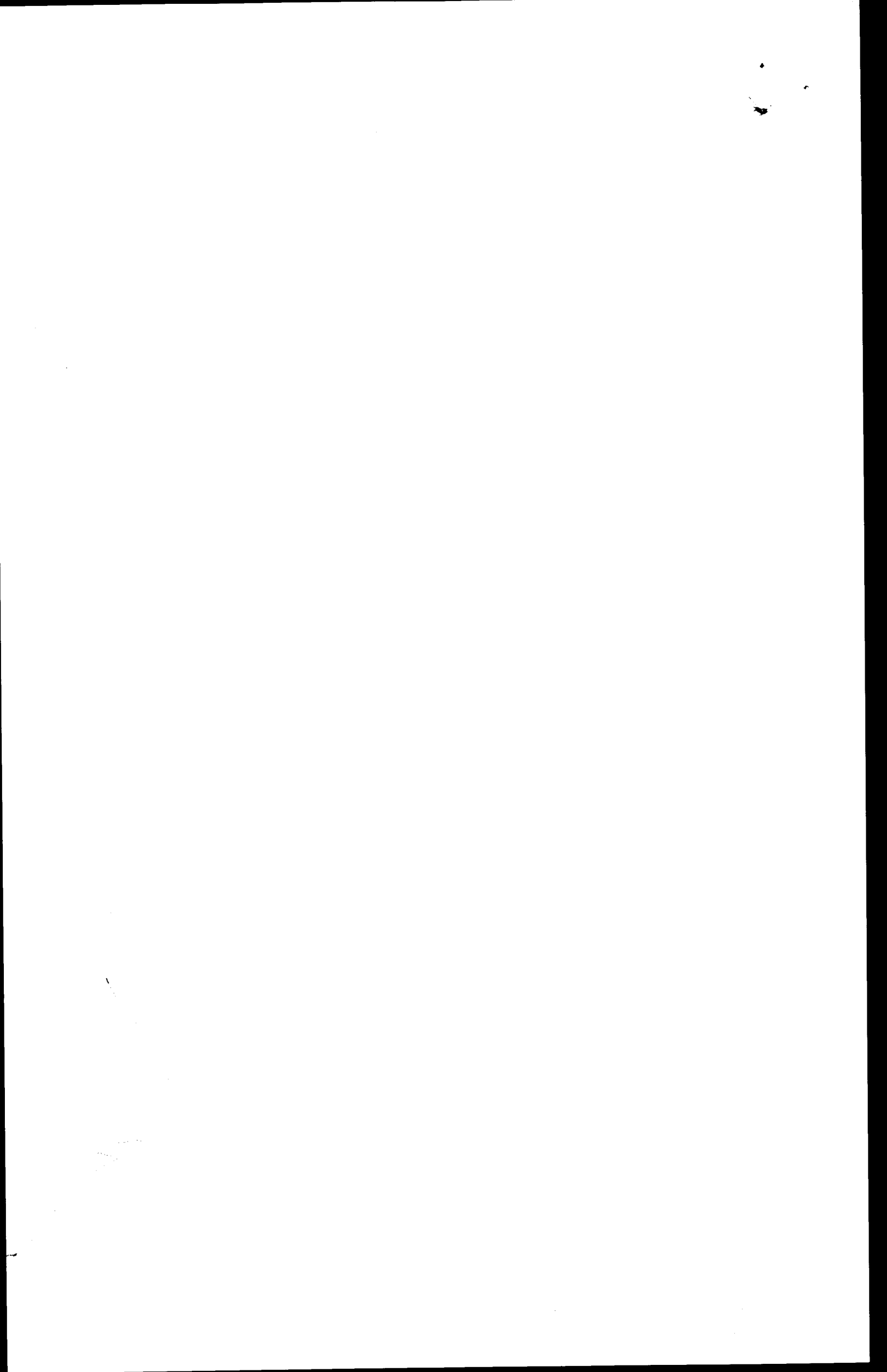
The petitioner respectfully submits as under:

1. The petitioner being a resident and registered voter of District ^{Kasur} ~~Lahore~~ is entitled to object to the Preliminary Delimitation of the Constituencies of NA-138 Kasur – II NA-137 Kasur – I. Copies of the CNIC and Voter Certificate are **ANNEX - A**.
2. The petitioner is aggrieved of the Preliminary Delimitation carried out by the respondent Delimitation Committee. Hence, this objection petition / representation.
3. The petitioner's proposal with justification in support of his objection are as follows:

**PRELIMINARY LIST OF NA – 138 KASUR – II
by the Delimitation Committee**

- a. Raja Jang QH of Kasur Tehsil;
- b. Raja Jang MC;
- c. Kot Radha Kishen Tehsil.
- d. The following QHs of Kasur Tehsil:
 - (1). Usman Wala;
 - (2). Khudian;
 - (3). Bheela Hithar excluding the following PCs:
 - (i). Bheela Hitar, and
 - (ii). Bhalla
- e. Khudian MC.

Total Population: 829492.



SUGGESTIONS / PROPOSAL

That in order to rectify above mentioned illegalities and infringements of principles of delimitation, following suggestions are made:

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Areas Proposed to be Included in NA – 138 Kasur - II:

(After exclusion from NA – 137 Kasur – I.)

The following PCs of QH Kasur - I:

- (a) Athil Pur PC (Population: 21,485);
- (b) Aurara PC (Population: 13,382);
- (c) Hardo Sahari PC (Population: 30,618).

Areas Proposed to be Excluded from NA – 138 Kasur - II:

(By inclusion in NA – 137 Kasur – I.)

The following PCs of Bheela Hithar QH:

- (a) Joura PC (Population: 12,862);
- (b) Gohar PC (Population: 11,901);
- (a) Tara Garh PC (Population: 14,028);
- (a) Sohdi Wal PC (Population: 08,590);

WITH THE PROPOSED EXCLUSION & INCLUSION:

[District Kasur Quota: 8,63,749]

Total population of NA – 137 Kasur – I:

Reduced from 865,491 to 847,316.

Total population of NA – 138 Kasur – II:

Enhanced from 829,492 to 847,667.

JUSTIFICATION:

Maps
inconsistent

1. The Raja Jang QH has been included in NA – 138 as a whole, however, there is an anomaly to the extent of its two PCs i.e., Lakhanke PC; and Khara PC, which are although mentioned in the Preliminary List of NA – 138, and even accounted for in the total population of NA-138 as well, however, not shown in the Map of NA – 138. Instead although they are being shown in the Map of NA – 137 but not mentioned in the Preliminary List of NA - 137. Hence, the Maps are inconsistent with the Preliminary List of both the NAs.
2. Therefore, in order to rectify this anomaly, it is necessary that the boundaries of the Maps of both the constituencies should be readjusted so as to make them consistent with the Preliminary Lists.
3. For making the Maps consistent with the Preliminary Lists:
 - (i) Firstly, the boundary of NA 138 is to be adjusted by extending it to include the omitted two PCs i.e., Lakhanke PC; and Khara PC; and
 - (ii) Secondly, just to avoid overlapping and making the said two PCs contiguous with the NA-138, the following two PCs of Kasur – I QH i.e., Athil Pur PC and Aurara PC are required to be included in the NA-138 being:

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- (a). contiguous to the NA-138 and would form a proper one block; and
- (b). make the constituency homogenous and convenient for the public because of means of communication etc.
- (iii) Even under the previous delimitation of 2002, the proposed PCs were part of the same old NA-138.
- (iv) Even all the PCs proposed to be included in NA - 138 were part of the old NA-107 alongwith other PCs of presently preliminary delimited constituency of NA-138 as one constituency in all the earlier General Elections since 1985.

4. Whereas, for maintaining parity in the population and public convenience of the residents of both the constituencies, it has been proposed to exclude from NA-138 the following PC of Bheela Hithar QH:

- (a). Joura PC (Population: 12,862);
- (b). Gohar PC (Population: 11,901);
- (a). Tara Garh PC (Population: 14,028);
- (a). Sohdi Wal PC (Population: 8,519);

These PCs have never been a part of the constituency sharing other areas comprising the preliminary delimited NA-138 since 1985.

5. That under the Preliminary List, the difference in the population of both the Constituencies is: 35,999 which would be reduced to just 351 only, bringing parity in population.

Copy of the Preliminary List with Marked Map issued by the ECP; the Petitioner's Proposed List of Constituencies with Proposed Shaded Map, and the Census Report are ANNEX - B, C and D.

6. That if the petitioner's proposal is not accepted and the preliminary delimitation is not amended, revised / modified, the petitioner shall also suffer irreparable loss.

PRAYER:

It is respectfully prayed that the Preliminary Delimitation of the Constituencies of NA-138 Kasur - II and NA-137 Kasur - I of District Lahore, may please be amended, altered, and modified as proposed by the petitioner.

Petitioner in Person



(SHEHBAZ AHMAD KHAN)

Advocate High Court

Son of Javed Ahmad Khan,
Resident of Rao Khanwala ,

Tehsil and District Kasur
[NA-138 Kasur - II].

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