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Representation under section 21 of the Elections Act, 2017, read with rule 12 of the Election Rules, 2017, in respect of the delimitation of constituencies of National Assembly of District Kasur particularly concerning proposed constituencies NA – 139 and NA – 140

Respectfully *Sheweth*:-

1. That the Petitioner is a permanent resident and voter of Chak No. 003 (Mazid Theh) forming part of Chak No. 003 (Mazid Theh) PC, Pattoki – II QH of Pattoki Tehsil, District Kasur. He is a veteran politician and remained councillor from Chak No. 003 (Mazid Theh). Welfare and betterment of people of his local area are paramount considerations for the Petitioner and he has been struggling for the same for a long time.
2. That through delimitation conducted by this Honourable Commission in the year 2002, District Kasur was allocated five (05) National Assembly Constituencies. However, according to 2017 Census of Pakistan, total population of District Kasur is 3,454,996 (three million four hundred fifty four thousand nine hundred ninety six). Therefore, as per Formula [Population of District ÷ Quota (Punjab) i.e.  $3,454,996 \div 780,266$ ], the District Kasur has been allocated four (04) constituencies / seats of National Assembly in the Preliminary Delimitation Report, 2018 published by this Honourable Commission on 05.03.2018.
3. That the Preliminary Delimitation Report, 2018 proposes the delimitation of four (04) constituencies of National Assembly of District Kasur in the following manner:

Sr. No.	No. and name of Constituency	Extent of Constituency	Total Population
1.	NA – 137 Kasur – I	(a) The following QHs of Kasur Tehsil (1) Mustafa Abad (2) Kasur – I (3) Kasur – II (4) Ganda Singh Wala (5) The following PCs of Bheela Hithar QH (i) Bheela Hithar; and	865491

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		(ii) Bhalla (b) Mustafa Abad MC (c) Kasur MC  Of Kasur District	
2.	NA - 138 Kasur - II	(a) Raja Jang QH of Kasur Tehsil (b) Raja Jang MC (c) Kot Radha Kishan Tehsil (d) The following QH of Kasur tehsil (1) Usman Wala (2) Khudian (3) Bheela Hithar excluding the following PCs: (i) Bheela Hithar; and (ii) Bhalla (e) Khudian MC  Of Kasur District	829492
3.	NA - 139 Kasur - III	(a) Chunian Tehsil (b) The following PCs of Pattoki - I QH of Pattoki Tehsil: (1) Chak No. 034 (2) Chakoki (3) Wan Adhan  Of Kasur District	861992
4.	NA - 140 Kasur - IV	(a) Pattoki Tehsil excluding the following PCs of Pattoki - I QH (1) Chak No. 034 (2) Chakoki (3) Wan Adhan	898021

4. That through the instant representation, the petitioner craves the gracious indulgence of this Honourable Commission to delimit the above constituencies in the following manner:

Sr. No.	No. and name of constituency	Proposed amendments, alterations or modifications	Extent of constituency after including the proposal	Total population after acceptance of the proposal
1.	NA - 137 Kasur - I	No amendment, alteration or modification is proposed / suggested by the petitioner	(a) The following QHs of Kasur Tehsil (1) Mustafa Abad (2) Kasur - I (3) Kasur - II (4) Ganda Singh Wala (5) The following PCs of Bheela Hithar QH (i) Bheela Hithar; and (ii) Bhalla (b) Mustafa Abad MC (c) Kasur MC  Of Kasur District	865491

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2.	NA - 138 Kasur - II	No amendment, alteration or modification is proposed / suggested by the petitioner	(a) Raja Jang QH of Kasur Tehsil (b) Raja Jang MC (c) Kot Radha Kishan Tehsil (d) The following QH of Kasur Tehsil (1) Usman Wala (2) Khudian (3) Bheela Hithar excluding the following PCs: (i) Bheela Hithar; and (ii) Bhalla (e) Khudian MC  Of Kasur District	829492
3.	NA - 139 Kasur - III	<b>Exclude</b> • The following PCs of Pattoki - I QH of Pattoki Tehsil: (1) Chak No. 034 (2) Chakoki (3) Wan Adhan  <b>Include</b> • The following PCs of Pattoki - II QH of Pattoki Tehsil: (1) Chak No. 003 (Mazid Theh) (2) Umar Abad	(a) Chunian Tehsil (b) The following PCs of Pattoki - II QH of Pattoki Tehsil: (1) Chak No. 003 (Mazid Theh) (2) Umar Abad  Of Kasur District	896794
4.	NA - 140 Kasur - IV	<b>Exclude</b> • The following PCs of Pattoki - II QH of Pattoki Tehsil: (1) Chak No. 003 (Mazid Theh) (2) Umar Abad  <b>Include</b> • The following PCs of Pattoki - I QH of Pattoki Tehsil: (1) Chak No. 034 (2) Chakoki (3) Wan Adhan	(a) Pattoki Tehsil excluding the following PCs of Pattoki - II QH (1) Chak No. 003 (Mazid Theh) (2) Umar Abad  Of Kasur District	863219

5. That being aggrieved by and dissatisfied with the part of list of constituencies, published in the Preliminary Delimitation Report, 2018, particularly specifying the areas proposed to be included in / excluded from proposed National Assembly constituencies NA - 139 and NA - 140 of District Kasur and in the best interest of the population of the district as a whole, the Petitioner craves the kind indulgence of this Honourable Commission for making amendments, alterations or modifications as suggested / proposed by the Petitioner in paragraph 4 above, *inter alia*, on the following

Grounds

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- (a) That a combined reading of section 20 of the Elections Act, 2017 and rule 10 of the Election Rules, 2017 reveals that the following principles and procedures are to be kept in mind at the time of making the delimitation of the constituencies:
- (i) Distribution of population in geographically compact areas
  - (ii) Physical features
  - (iii) Existing boundaries of administrative units
  - (iv) Facilities of communication
  - (v) Public convenience
  - (vi) Other cognate factors to ensure homogeneity
  - (vii) The delimitation of constituencies of an Assembly shall start from the Northern end of the district; and
  - (viii) Then it will proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable
  - (ix) The variation in population between two or more constituencies shall not ordinarily exceed ten percent
- (b) That while preparing the Preliminary Delimitation Report, 2018 comprising of proposals for fresh delimitation of constituencies for National Assembly in Kasur District especially proposed NA – 139 and NA – 140, it is respectfully submitted, the relevant Delimitation Committee failed to adhere to the above stated mandatory principles and procedures in letter and spirit therefore there is a need to revisit the said delimitation proposal by this Honourable Commission.
- (c) That while preparing delimitation report for proposed constituency NA – 139 (formerly NA – 141), the Delimitation Committee excluded the Patwar Circles of Pattoki – II QH of Pattoki Tehsil namely Chak No. 003 (Mazid Theh) and Umar Abad and included the same in proposed constituency NA – 140 (formerly NA – 142). It is to be noted here that the said areas excluded from NA – 139 and included in NA – 140 had throughout remained a part of such constituencies of the National Assembly forming major parts of Chunian Tehsil since 1985 delimitation because of the guiding factors such as geographical compactness, facilities of communication and public convenience.

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(d) Similarly, Patwar Circles of Pattoki – I QH of Pattoki Tehsil namely Chak No. 034, Chakoki and Wan Adhan has wrongly been included in proposed NA – 139 and a result of, it is respectfully submitted, non-application of mind by the relevant Delimitation Committee because the inclusion of these Patwar Circles in proposed NA – 139 is a blatant violation of principles of delimitation as mandated by section 20 of the Elections Act, 2017.

(i) These Patwar Circles do not form a geographically compact part of proposed NA – 139 and such inclusion has created pockets in the proposed constituency, hence violation of principle of distribution of population in geographically compact areas.

(ii) These Patwar Circles are on the other side of railway line from Tehsil Chunian and there is hardly any facility of direct communication from these Patwar Circles to main NA – 139, hence violation of principle of facilities of communication.

(iii) Since these Patwar Circles do not form a geographically compact area of the proposed NA – 139 and badly suffer from lack of facilities of communication, the population of these Patwar Circles would have to travel all the way around through Pattoki city and other parts of proposed constituency NA - 140 in order to reach main NA – 139, hence violation of principle of public convenience.

(e) That if the proposal for delimitation of NA – 139 and NA - 140 made by the Delimitation Committee in its Preliminary Delimitation Report, 2018 is finalised without incorporating amendments, alterations or modifications proposed / suggested by the Petitioner in paragraph 4 above, the entire population of above detailed Patwar Circles would suffer irreparable loss and hardships and their miseries would increase manifold.

(f) That the amendments, alterations or modifications proposed / suggested by the Petitioner in paragraph 4 above are for the sole purpose of providing facilities and ease to the inhabitants of the said areas.

In view of the foregoing, it is most respectfully prayed that the instant representation may kindly be accepted and the amendments, alterations or modifications proposed / suggested by the Petitioner in paragraph 4 of this representation may graciously be incorporated in the final report and list of constituencies showing the areas included in each constituency.

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Any other relief which this Honourable Commission may deem just and appropriate may also be granted to the Petitioner in the interest of law, justice and equity.

*Siddiq*

Petitioner

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Through

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