



**BEFORE THE HON'BLE SECRETARY ELECTION
COMMISSION OF PAKISTAN, ISLAMABAD**

**REPRESENTATION U/S 20 (2 & 3) OF THE ELECTION ACT, 2017
R/W RULE 12 OF THE ELECTION RULES, 2017 IN RESPECT OF
PROPOSED CONSTITUENCY NA-150**

Respectfully Sheweth:

1. That the Objector is registered voter of Constituency No. NA-150, who is aggrieved by the delimitation of this constituency proposed in preliminary report. In order to substantiate this fact his copy of ID Card and vote certificate are attached with this memorandum.
2. That it is the constitutional obligation of the Election Commission of Pakistan to ensure free and fair polls in the country. For achieving this objective fair and transparent delimitation is indispensable. Election Commission of Pakistan is duty bound to provide all voters of the constituency such an environment or process where they can exercise their right to vote in a free and convenient manner.
3. That the constituency NA-150 has been notified by the Election Commission of Pakistan, the proposed demarcation of the boundaries of electoral constituency NA-150 Khanewal is faulty and may disenfranchise a great number of voter, therefore, liable to be amended / corrected and requires to be delimited as per proposal of the Objector, inter alia on the following:

GROUND:

- i) Voters of this constituency had been exercising their right of votes without any difficulty in the elections which were held in the year of 2002, 2008 and 2013 because facilities of communication were easily available and population was distributed in geographically compact areas, therefore, there is no legal

justification for disturbing the demarcation of boundaries of this constituency for the upcoming elections.

- ii) Previously this constituency was numbered as NA-156 (Old) which is NA-150 now. If the demarcation of boundaries of constituency number NA-156 is kept intact it will not cause any hindrance in conducting the elections in an honest, just, fair and free from corrupt practices manner.
- iii) That the areas of Patwar Circle (PC) Korey Wala, PC Kot Bahadar and 14/V of Qanongoie Headquarter (QH) Kabirwala-I have unjustifiably been included into NA-150, the said areas remained part of the adjoining constituency now proposed as NA-151, during the last three general elections held in the years 2002, 2008 and 2013. The said area is distantly situated from Jhang Kabirwala Road, which is the transport backbone of the constituency and is on both its sides, and is therefore the longstanding identity of National Assembly constituency of Tehsil Kabirwala. The geographical existence of the above said PCs in the map, also demonstrate that the said area is more contiguous with the area of NA-151 therefore exclusion of the above said area of NA-150 and its inclusion in NA-151 is fully justified.
- iv) That PC Barey Wal, PC Hussain Abad and PC Jalil Pur of Qanoongoie HQ Bagarr have the compact boundaries with the area of NA-151, not NA-150 to which they have been attached. These areas never have been the part of National Assembly Constituency of Tehsil Kabirwala, more importantly PC Jalil Pur is in the shape of "ISLAND" is "Tailor made" and has no geographical connection with the rest of the area of above said PCs of Bagarr QH as the intervening PC Jahan Pur and PC Nahaley Wala form the part of NA-151. Since any area in the shape of Island cannot be delimited thus the exclusion of the above said PCs of Bagarr QH from NA-150 will be compliance of Section 20 (i) of the Election Act, 2017 which mandates that geographical contiguity and compactness must be adhere to.

- v) That PC Chak # 1/KM, PC Chak # 6/DH, PC Chak # 9/DH, PC Chak # 16/DH, PC Daira Mahram, PC Kot Islam of QH Abdul Hakim which form part of NA-151 warrant to be included in NA-150 mainly on the ground that "River Ravi" intervenes between the said PCs of QH Abdul Hakim and urban area of Municipal Committee Abdul Hakim and one has to cross the area of NA-150 to reach the above said PCs included in NA-151, the factor of the means of communications have not been addressed in this regard in the proposed NA-150. It is worth mentioning here that the above said PCs are compact and contiguous with the areas of NA-150 therefore exclusion of the same from NA-151 and its inclusion in NA-150 is absolutely legal and justified.
- vi) That the exclusion of PC 5 Kassi of QH Kabirwala-II from NA-151 and its inclusion in NA-150, is necessary as it had the longstanding existence with the area of NA-150. The said PC situated on and accessible the main Jhang Kabirwala road thus its inclusion in NA-151 is without any lawful justification because it can only be reached by going through NA-150. Moreover the proposed arrangement is the source of odd shape and uneven boundaries of both constituency therefore to maintain the compactness and to address the convenience factor of general public, exclusion of PC 5 Kassi from NA-151 and its inclusion in NA-150 is the dire need of the area.
- vii) That the population factor of the above said changes proposed by the Objector has fully been addressed in the enclosed table of population which demonstrate that in view of proposal of the Objector given in the preceding paras minimum and maximum standard of the population remains intact.

Table of Population NA-150 Proposed by Election Commission of Pakistan, Islamabad

Exclusion proposed by the Petitioner QH Kabirwala-I. PC Korey Wala 4380, PC Kot Bahadar 6127, PC 14/V 6449.	Total:- 42162.
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QH Bagarr, PC Barey Wala 7930, PC Hussain Abad 8020, PC Jalil Pur 9256.	
Inclusion proposed by the Petitioner QH Abdul Hakim: PC Chak # 1/KM 1499, PC Chak # 6/DH 9593, PC Chak # 9/DH 1176, PC Chak # 16/DH 2102, PC Dara Mahram 7919, PC Kot Islam 13496. QH Kabirwala-II: PC 5 Kassi 16209.	Total: 51994.
Total population as per public proposal NA-150	739908
Total population as proposed by Election Commission of Pakistan.	730076
Total population NA-151 proposed by Election Commission of Pakistan.	758171
Total population NA-151 as per public proposal.	748339

- viii) That the proposal of the Objector from all angles adequately address the factor of population, geographical compactness, physical features, existing boundaries, facilities of communication, public convenience and all ancillary cognate factors.
- ix) That proposed map in view of the proposal of the Objector is being appended.

In view of the above, it is therefore respectfully prayed that instant representation may kindly be accepted, constituency NA-150 may very kindly be delimited as per above mentioned proposal and corresponding changes / correction may also be made in constituency NA-151.

Tassadiq

Objector
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