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**BEFORE THE HONOURABLE ELECTION COMMISSION OF PAKISTAN**

**In Re: Representation under Section 21(3) of the Election Act, 2017 read with Rule 12(1) of the Election Rules, 2017 in relation to the National Assembly Constituency NA-191 (D G Khan III)**

It is respectfully submitted as under:

1. This is a representation under Section 21(3) of the Elections Act, 2017 (“**Elections Act**”) read with Rule 12(1) of the Election Rules, 2017 (“**Election Rules**”) with reference to the draft proposal for delimitation by the Honorable Election Commission of Pakistan (“**Commission**”) of the National Assembly constituency NA-191 (D G K III) (the “**Constituency**”) (and other constituencies proposed within District Dera Ghazi Khan) as contained in the draft proposal of delimitation of the said constituency prepared and notified by the Commission pursuant to Section 17 and 20 of the Elections Act and Rule 7 and 10 of the Election Rules as its Preliminary Proposal for delimitation as provided for in Rule 11(2) of the Election Rules.
2. This representation is filed with the learned Secretary of the Commission in compliance with Rule 12(4) of the Election Rules by **Mr. Abdul Kareem Lashari** son of Naseer Ahmed Khan Lashari (the “**Petitioner**”) who is a voter of the constituency NA-191. The Petitioner is a permanent resident of Basti Lashari, DakKhanaMamoriKhasTehsil and District Dera Ghazi Khan (NA-191 D G Khan III).
3. The principal grounds on which this representation is moved and on the basis of which amendments, alterations and modifications in the preliminary proposals of delimitation by the Commission to the delimitation of the Constituency (and other constituencies proposed within District Dera Ghazi Khan) are as under:
  - (i) The delimitation of the Constituency is not compliant with the requirements of Section 20 of the Elections Act as, *inter alia*, the Constituency has not been properly, correctly and lawfully delimited by giving due weight and regard to the following statutorily prescribed factors:
    - (a) distribution of population in geographically compact areas;

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- (b) physical features;
  - (c) existing boundaries of administrative units;
  - (d) facilities of communication and public and voter convenience; and
  - (e) other cognate factors to ensure homogeneity in the creation of constituencies in District Dera Ghazi Khan.
- (ii) The Constituency has not been delimited in accordance with the principles set out in Rule 10(5) of the 2017 Rules *vis-à-vis* the requirements of the population quota prescribed therein. According to the 2017 Census the total population of District Dera Ghazi Khan is **2872201** so the population “quota” under Rule 10(5) of the Election Rules is **718150** for each constituency.
4. In support of the objection it is submitted that the principles of Section 20(1) of the Elections Act and Rule 10(5) of the Election Rules have not been adhered to, *inter alia*, as:
- (a) From a bare perusal of the map of the Constituency (as proposed by the Commission in its preliminary report) is not delimited in a “compact” shape but rather has been given a very peculiar shape. An area comprising of essentially three Patwar Circles (Pai Ramdani, Basti Khosa and Mamori) (the “**Areas**”) of Kotchutta Qangoi Teshail Dera Ghazi Khan has been incorporated in the Constituency for no apparent reason in the Map.
  - (b) It is important to mention here that the Areas have been mentioned in the proposed map of the Constituency issued by the Commission, however, in Gazette Notification dated 5 March 2018 (the “**Notification**”) issued by the Commission the Areas are not notified as the part of the Constituency. Furthermore, the number of population has also not been added in the total population of the Constituency.
  - (c) The Commission’s proposed delimitation of Constituency has not followed, the unusual length and shape of the constituency also does not take into account and give due weight and regard to facilities of communication and public and voter convenience.

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(d) With reference to the requirements of Section 20 Elections Act and Rule 10(5) of the Election Rules it is submitted that the difference of population between the constituencies in District Dera Ghazi Khan is not balanced and in conformity with the statutory requirements and principles. This error, along with the contents of the foregoing paragraphs, requires correction and the Petitioner proposes and prays that this be effected by shifting adjacent and contiguous Areas from the Constituency to NA-192 (D G Khan IV) as shown in the map depicting and showing the amendments, alternations and modification sought by the Petitioner.

5. **The Petitioner seeks and prays for the following amendments, alterations and modifications to the preliminary proposal of the Commission for delimitation of NA-191 (D G K III):**

- (a) As contained in the preliminary proposal of the Commission for delimitation, the total population of the Constituency is 739693.
- (b) As contained in the preliminary proposal of the Commission for delimitation, the total population of NA-192 (D G Khan IV) is 694331.
- (c) The Petitioner hereby prays that the Areas be *excluded* from the Constituency and be *included* to NA-192 (D G Khan IV):

<b>PC</b>	<b>Population</b>
Pai Ramdani	4746
Basti Khosa	10925
Mamori	19316

**Total Included: 38303**

6. As a result of the foregoing proposal the total population of NA-192(D G Khan IV): will stand as follows:

Current Population	694331
Inclusion of Areas	+ 38303
<b>Total Population after amendment</b>	<b>732634</b>

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7. Consequential to the foregoing, the proposal for amendments, alterations and modifications of the preliminary proposal would result in the following populations for the constituencies NA-191(D G Khan III) and NA-192(D G Khan IV):


Constituency	Old Population	Proposed Population
NA-191	739693	739693
NA-192	694331	<b>732634</b>

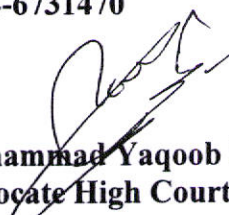
8. **Consequential to the amendments, alterations and modifications sought by the Petitioner to NA-191 (D G K III):**

- (a) in effect from the proposed amendment, the Areas may be excluded from Provincial Assembly of the Constituency PP-290 (D G Khan VI) and may be included in the PP-291 (D G Khan VII) of the Constituency.

**PRAYER**

Wherefore the Petitioner respectfully prays that the instant representation be graciously accepted by the Commission and that the Commission graciously make the amendments, alterations and modifications sought to the draft proposal for delimitation of NA-191 (D G KAHN III) by the Petitioner (and all make all applicable and consequential amendments, alterations and modifications sought to the draft proposal for delimitation of NA-191(D G KAHN III) NA-192 (D G KAHN IV) and also the related Provincial Assembly constituencies listed hereinabove) all as detailed in this representation and as also depicted in the map at Annexure hereto.

  
Petitioner: **Abdul Kareem Lashari**  
0334-6731470

  
Through: **Muhammad Yaqoob Khan**  
Advocate High Court

Islamabad, April 2, 2018