

**BEFORE THE HONOURABLE ELECTION  
COMMISSION OF PAKISTAN**

**Representation with regard to the Delimitation of 3 constituencies  
for the National Assembly for District of Sialkot i.e. NA 74, NA 75 &  
NA 76 under subsection 3, Section 21 of the Election Act, 2017  
Read with Rule 12 of The Election Rules, 2017.**

Petitioner : **Malik Tahir Akhtar**  
CNIC No. : **34603-8778689-9**  
Resident of : **Village Dheenglay, Wazirabad Road, Tehsil &  
District Sialkot**  
Mobile No. : **0300-8450242**

The petitioner respectfully submits:

1. That the election commission of Pakistan has issued Notification dated 05.03.2018, in which the list of the new delimited constituencies for the National Assembly and the Provincial Assemblies has been provided.
2. That the District of Sialkot with a population of 38,93,672 has been allocated 5 National Assembly and 11 Provincial Assembly seats.

3. That the petitioner is a resident of the District of Sialkot and is a voter of NA 75 (Previous NA-111). The delimitation of National constituencies has been done maliciously hence jeopardizing the interest of the Petitioner.
4. That the delimitation of the 3 constituencies of the National Assembly from District Sialkot i.e. NA 74, NA 75 & NA 76 is not in consonance with the provisions of the Election Act, 2017. The Delimitation Officer has proceeded with the delimitation of the above mentioned 3 constituencies for the National Assembly from Sialkot District in disregard of the provisions of law and cardinal principles of compactness, contiguity and equality of population.
5. That while formulating the above mentioned 3 National constituencies, the principles laid down in S.20 of the Election Act, 2017 have not been followed at all. The principle of distribution of population in geographically compact areas has been blatantly disregarded and the delimitation does not appear to have been proposed by the Delimitation Officer in lawful and bonafide exercise of the powers and duties assigned to him.
6. That the Delimitation Officer has also flouted the principle, as given in the guidelines and instructions issued by the Honourable Election Commission of Pakistan, to take all possible care to keep intact the Administrative boundaries of Tehsils and Qanungo Halqas unless it is necessary to do so to

remove the glaring disparity of population amongst various constituencies of the same District. Qanungo Halqas have been demolished and distributed to different constituencies to suit the interests of specific prospective candidates.

7. That while formulating the above mentioned 3 National constituencies the Delimitation officer has ignored the fact that Sialkot II QH has been traditionally and historically associated with the National constituency of Tehsil Sialkot since 1970. The Delimitation Officer has proposed to attach Sialkot II QH with the two National constituencies of Sialkot City and Sambrial Tehsil i.e. NA 75 & NA 74 to give undue favour to the certain Candidates.
  
8. That in the purposed amendments by the petitioner some Patwar Circles which are Geographically attached to the constituencies are NA 75 and NA 74 are suggested to be included in the said constituencies while the other which are attached to the Sialkot Tehsil constituency (NA 76) of included in it. Some Patwar circles of Gunnah QH are included in NA-74 to balance to the population.
  
9. That according to the election rules the delimitation of the District should have been started from the North of the said District whereas the Delimitation Officer while formulating the National constituencies to the Sialkot District has proposed the Delimitation of NA constituencies of District Sialkot from the Eastern side of the Sialkot i.e. NA-72 Sialkot I which falls in

Tehsil Pasrur and its neighbouring National constituency is NA 72 of District Narowal, whereas NA 76 Sialkot V borders NA 68 of District Gujrat.

10. That the Petitioner has proposed the delimitation of above mentioned 3 constituencies for the National Assembly from Sialkot District as given in Annexure A. The same proposals have been marked on the maps of the District Sialkot as given in Annexure B. The list of 3 National constituencies as delimited by the Election Commission of Pakistan and the accompanying map are attached as Annexure C & D.

11. That the Petitioner has proposed changes in the following constituencies only

- N.A 74 Sialkot III
- N.A 75 Sialkot IV
- NA 76 Sialkot V

And no changes have been proposed in the remaining 2 National constituencies

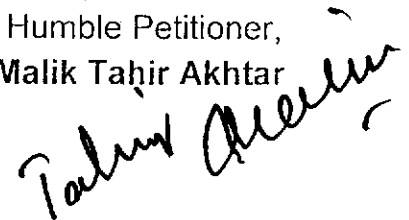
12. The petitioner in making these proposals for the delimitation of 3 above mentioned National constituencies has conformed to the provisions of the Election Act, 2017 and the Election Rules, 2017 and the guidelines and instructions issued by the Honourable Election Commission of Pakistan in the abovementioned notification. The cardinal principles of compactness, contiguity and equality of population have been obeyed. All possible care has been taken to keep the Administrative boundaries of Tehsils and Qanungo Halqas

intact unless it is necessary to do so to remove the glaring disparity of population amongst various constituencies of the same District.

In view of the above, it is respectfully prayed that the 3 National Constituencies i.e. NA 74, NA 75 & NA 76 for the District Sialkot be kindly be ordered to be delimited as proposed by the Petitioner.

Block Code : 1780 20 914  
Sh. No. : 1

Humble Petitioner,  
Malik Tahir Akhtar



Through Counsel:



**Ch. Muhammad Javed Gujar**  
Advocate High Court Islamabad

**Akmal Shahzad Butt**  
Advocate High Court

