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**Memorandum/Representation by: Barrister Adil Kahlon**

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To,

**THE SECRETARY,**  
Election Commission of Pakistan  
Election Commission Secretariat,  
G-5/2, Constitution Avenue,  
Islamabad

AA/24/03/218  
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**Subject:** REPRESENTATION under Rule 12 of the Election Rules 2017 ("The Rules") read with Section 20 of the Election Act 2017 ("The Act") challenging the Preliminary Proposal pertaining to the delimitation of National Assembly constituencies in District Narowal.

Respected Sir,

1. The instant Representation is being filed by Barrister Adil Kahlon (hereinafter referred to as the "Applicant"), voter member of National Assembly Constituency No.78 Narowal II and the Applicant is duly competent to file the instant Representation under the law.
2. Through this Representation, the Applicant seeks to challenge the preliminary proposal published by the Election Commission of Pakistan pertaining to the delimitation of the National Assembly constituencies of District Narowal (hereinafter referred to as The "Preliminary Proposal"). The map of the Preliminary Proposal which was provided by the Provincial Election Commission, as per the mandate of law, is attached as ANNEXURE A.
3. It is pertinent to mention here that in the Preliminary Proposal, District Narowal is now left with two (2) National Assembly (NA) constituencies, numbering 77 and 78 which previously were three (3) in numbers (numbering NA 115, 116 and 117).
4. The Preliminary Proposal is in sheer violation of the Statuary Principles of delimitation as enshrined in Section 20 of the Act ("The Principles") along with catena of dictums laid down by the Superior Courts of the country, thus it is deemed necessary to amend/alter/change the Preliminary Proposal as follows:

**Suggested Amendments in the Preliminary Proposal:**

- i) Qanonogo Halqa Dudu-Chak (hereinafter referred to as "QH-DC") be taken out of NA-78 Narowal II (excluding Patwar Circles (PCs) a) Manidala, b) Sahari and c) Maingra) and inserted into NA-77 Narowal I (highlighted *in light blue colour on the map at ANNEXURE-B*)
- ii) Qanonogo Halqa Dhamthal (hereinafter referred to as "QH-DT") be into inserted into NA-78 Narowal II (excluding Patwar Cirlces (PCs) a) Targa, b) Soian, c) Sangial, d) Ainowali and e) Munda Bajwa) and taken out of NA-77 Narowal I (highlighted *in orange colour on the map at ANNEXURE-C*)

## GROUNDS SUPPORTING THE SUGGESTED AMMENDMENTS

24/03/2018 (2)

### HISTORICAL/CULTURAL BACKGROUND

- i) Traditionally, historically, socially, culturally and geographically, QH-DT has always been part of Narowal Tehsil and QH-DC has been part of Shakargarh Tehsil through the annals of time.

### SERVICES/COMMUNICATION

- ii) Keeping in mind all the five factors narrated in (i) *ibid*, the layout of services, road network, revenue, policing, education and health etc were accordingly aligned and developed for QH-DT to Narowal and for QH-DC to Shakargarh.
- iii) It may be pertinent to mention here that the local population of QH-DT was part of old District Sialkot, whereas QH-DC was aligned with District Gudaspur (Tehsil Shakargarh), before the partition and till recent times.

### PHYSICAL/GEOGRAPHICAL

- iv) QH-DT is in closest proximity to the town of Narowal i.e NA-78, whereas QH-DC is in close and direct proximity to the town of Shakargarh i.e NA-77.

### OTHERS COGENT FACTORS

- v) In a very recent sanction of Revenue Tehsil of Zafarwal in the year 2009, QH-DT was linked with Zafarwal, whereas QH-DC continued to be part of Shakargarh and not vice versa, as is proposed in the Preliminary Proposal. Furthermore, prior to 2009, QH-DT was part of Narowal Tehsil.

*(Old Map of District Narowal is attached as ANNEXURE-D)*

- vi) Although a clear swap over of QH-DT to Narowal Constituency i.e. NA-78 and QH-DC to NA-77 (Shakargarh) would keep the population ratio almost balance, but for the better fine tuning, following adjustment of PCs will not only keep the local geography straight, but would also keep the population equal in NA-77 and NA-78

- a) QH-DC to NA-77, less PCs Mandiala, Sahari, Maingra and add the same with NA-78 (*highlighted in yellow colour at the map attached at ANNEXURE-E*)

|  | <u>Population</u> |
|--|-------------------|
| QH-DC                                  | : 115476          |
| Less 3 PCs (Sahari, Mandiala, Maingra) | : -26496          |
| ✓ Remaining                            | : 88984           |

- b) QH-DT to NA-78, less PCs Targa, Soyan, Sangial, Ainowali, Munda Bajwa and add the same with NA-77 (*highlighted in light blue colour at the map attached at ANNEXURE-E*).

|   | <u>Population</u> |
|---|-------------------|
| QH-DT   | : 134334          |
| Less 5 PCs (Targa, Soyan, Sangial, Ainowali, Munda Bajwa) | : -44640          |
| ✓ Remaining   | : 89694           |

- vii) If the suggestion at paragraph (vi) above is decreed, it will remarkably reduce the hazards of connectivity caused by the seasonal flooding of rivers Basanter and Bein, separating the population of NA-77 and 78. Map attached at ANNEXURE-F shows the rivers Basanter and Bein crossing through NA-77 AND 78.

9/24/07/208

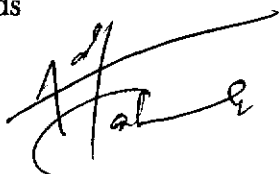
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viii) Furthermore, on a bare looking of the map at ANNEXURE-G, it can easily be seen that QH-DC runs deep into the other constituency i.e NA 77 Narowal I (which majorly comprises of Shakargarh Tehsil), like a camel hump. This shows that a major factor of physical and geographical homogeneity (as mandated by the Principles) was ignored while preparing the Preliminary Proposal. The public from the northern most end of the Constituency of NA-78, would have to travel all the way South to main Narowal City, which is the center of NA-78, to meet their Representative for redressal of their problems. This clearly anticipates the height of the discomfort and inconvenience which is likely to be caused to the common man if the Preliminary Proposal is allowed to continue. On the other hand, the people of QH-DC would find it much easier to visit Shakargarh MC and/or for that matter any other area of NA-77, since of its close proximity with it.

5. The above mentioned grounds are suggested strictly keeping in mind the Principles and the welfare of the people of Narowal District and it is stated on oath that no reflection of personal liking/disliking and/or bias is shown while making the said suggestions.
6. The map of District Narowal showing the NA Constituencies after incorporation of the suggested amendments mentioned herein is attached at ANNEXURE-H.

In view of the aforementioned grounds it is suggested that the Preliminary Proposal may kindly be amended as per the suggested amendments narrated above in the best interest and welfare of the people of Narowal District.

Profound Regards



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LINCOLN'S INN, ADVOCATE HIGH COURT



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