

BEFORE THE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

پاکستان انتخابات کمیشن
ایجنس نمبر ۱۸۳۸

APPEAL NO. _____ / 2018.

Abdul Rehman S/o Allah Ditta, Resident of Village
Butteranwali, Tehsil & District Gujranwala.

PETITIONER

VERSUS

Delimitation Committee of Election Commission of
Pakistan regarding NA Constituencies, Islamabad.

RESPONDENT

**REPRESENTATION UNDER SECTION 21 OF THE
ELECTION ACT 2017 READ WITH RULES 12 OF
ELECTION RULES 2017.**

Respectfully Sheweth:-

1. That the delimitation committee of the election commission regarding NA constituencies has issued a preliminary list of constituencies of District Gujranwala NA-79 to NA-84, vide its Notification dated: 05.03.2018. A copy of the notification is attached as ANNEXURE-A.
2. That the petitioner is a registered voter in village Butteranwali, Tehsil Sadar, District Gujranwala, with is part of NA-80 Gujranwala II as notified by Election Commission of Pakistan. He is therefore, filing the instant representation against all the six constituencies of District Gujranwala as a defect in a single constituencies effects all the constituencies. A copy of extract of electoral rule as Annexure -B to this petition.

3. That the proposed delimitation of the constituency NA-80 Gujranwala II NA -84 Gujranwala VI is illegal and against the rules of the following amongst

GROUND:

- a. Under Proviso Rule 10 (4) of the election Rules 2017, it has been provided that a Patwar Circle shall be the basic unit for delimitation and it shall not be broken under any circumstances. While delimiting NA-80 Gujranwala II and NA-81 Gujranwala III, the Limitation Committee has broken Patwar Circle Butteranwali. There are three villages in Patwar Circle Butteranwali namely Butteranwali, Sangowali and Kotli Ahdo out of these three villages Butteranwali has been included in NA-80 while the other two villages namely Sangowali and Kotli Ahdo, have been included in NA-81. This is a clear violation of the principle of delimitation.
- b. There are two villages in Patwar Circle Abdal, namely Abdal and Gagaywali. The Delimitation Committee has included village Abdal in NA-81 Gujranwala III but has included the other village Gagaywali in NA-80 Gujranwala II, therefore, Patwar Circle Abdal has also been broken which is a clear violation of rules proviso to rule 10 (4) of election rules 2017.
- c. That Tehsil city Gujranwala consist of only two Qanoongo Halqas namely Qanoongo Halqa City-I and Gujranwala City II. This Tehsil has been bifurcated. Qanoongo Halqa Gujranwala City I having a population of 36,736 has been included in NA-80 Gujranwala II, whereas Qanoongo Halqa

Gujranwala City II of this Tehsil has been included in NA-83 Gujranwala V.

- d. Municipal Corporation Gujranwala has been delimited in five different constituencies of Gujranwala which has only 06 constituencies of the NA. NA-80 GRW-II includes charge No. 9 and charge No. 38 of the municipal corporation. NA-81 GRW III consists of 17 different charges. Similarly, NA-82 GRW III consists of 16 different charges, NA-83 GRW V includes circles No. 8 of charge No. 12, circle No. 6 of charge No. 14, NA-84 GRW VI also includes circle No. 10-13 and 15 of charge No. 22. The inclusion of different charges of one municipal corporation in 05 out of 06 constituencies is discriminatory and practical.
- e. That constituency No. 80, 81, 82, 83, 84 are not compact. A glance at the maps clearly proves that the shape of the constituency is irregular, disproportionate, ill-logical and un-rational and therefore, illegal.
- f. Tehsil Gujranwala Sadar has been divided and parts of it have been included in 5 out of constituency of Gujranwala District. NA-80 Gujranwala II includes Qanoongo Halqa Talwandi Rahwali and Qanoongo Halqa Qila Didar Singh of Tehsil Sadar, NA-81 Gujranwala III includes charge No. 12 consisting of villages Aroop, Chak Khizer, Wania Wala, Sangowali, Abdal and Kotli Ahdo, NA-82 Gujranwala.
- g. Includes 14 different charges located in Tehsil Sadar, Gujranwala, NA-83, Gujranwala V includes Qanoongo Halqa Talwandi Musa Khan and Qanoongo Halqa Gujranwala Sadar NA -84 Gujranwala VI, includes Patwar Circle of additional Kolowala and Mandiala Meer Shikaran, as well as Qanoongo Halqa Eminabad of Tehsil Sadar, Gujranwala. There was no justification to bifurcate

an single Tehsil in 5 different constituency of Gujranwala District.

- h. That in order to delimit 6 constituencies in a rational and legal manner, the petitioner has proposed all the 6 constituencies which are attached as **ANNEXURE-C** to this representation.
- i. There is a great disparity of population of different constituencies of Gujranwala District as shown below:

(a). NA-81	8,52,471
(b). NA-82	8,64,145
(c). NA-84	7,93,857

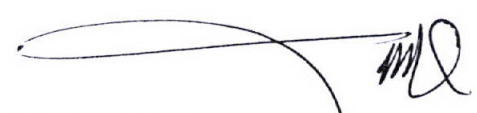
There is difference of 73288 between NA-82 and NA-84 and 56,614 between NA-81 and NA-84. This discrepancy is against the law and rules.

PRAYER:

Under these circumstances, it is most respectfully prayed that the proposed delimitation of al the 6 National Assembly Constituencies proposed by the petitioner in Annexure-C may very kindly be approved and delimited for National Assembly Seats of Gujranwala District by the Election Commission of Pakistan.

PETITIONER

Dated: 02/4/18
THROUGH COUNSEL:



CH. IMRAN QADIR BHINDER
Advocate
PGW-44070
Office:160-A, Near Excise Office
District Gujranwala

VERIFICATION:

Verified on Oath at Gujranwala, on this 2th of April, 2018, that the contents of the above said representation are true and correct to my personal knowledge and belief and nothing material has been concealed therein and no part of it is incorrect.

PETITIONER



MR SHAD ULLAH YASIR, ADVOCATE
Oath Commissioner
Appointed w.e.f 23-12-15 to 22-12-18
Distt. & Session Courts Gujranwala

Verification