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BEFORE ELECTION COMMISSION OF PAKISTAN

Representation Against the Preliminary Delimitation of Constituencies Announced by Election Commission of Pakistan (ECP) for National Assembly [Gujranwala-II, III, IV, VI]

The Petitioner submits as below:

1. That the petitioner is a registered voter and presently a member of the National Assembly elected from the former constituency NA-97/ Gujranwala-III [proposed NA-80] and had been contesting general election for National Assembly in said area since 1997.
2. That the Election Commission of Pakistan (hereinafter referred to as the ECP) has proposed new delimitation of constituencies for District Gujranwala whereby the number of NA constituencies in the District have been reduced from 7 to 6 i.e. one constituency has been eliminated.

2018

(Draft List of constituencies [Gujranwala-I, II, III, IV, V and VI] by ECP Annexed as Annex-I; Map of Gujranwala constituencies as per old census Annexed as Annex-II)

3. That while proposing new delimitation of constituencies, the petitioner's constituency i.e. formerly NA-97 [proposed NA-80/Gujranwala-II] has been bifurcated in such fashion that 8/9 union councils i.e. Census Charges 10-11-12 Municipal Corporation Gujranwala have been withdrawn and far-flung areas i.e. Qanongoi Halqa Qilla Dedar Singh, Qilla Dedar Singh Municipality, Laddhywala Warriach Municipality, Halqa City Qanongoi-II have been added without any justification and in violation of section 20 of the Election Act, 2017 (herein after refer to as Act). It may please be noted that former constituency NA-97 contained the population of 813,315 as per latest census and it was in a compact shape.

(Former composition and map of NA-97 is Annexed as Annex-III)

4. That according to the preliminary delimitation of constituencies by ECP, Gujranwala-I (NA-79) falls in Tehsil Wazirabad with the population of 830,396 as per latest census and other constituencies were to be delimited clockwise and north to south. Therefore, keeping the same delimitation principles in mind as aforementioned, composition of Gujranwala-II (NA-80) should have been kept

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intact on the lines of erstwhile Gujranwala-III(NA-97) in accordance with the **three(03)** cardinal principles i.e. (i) north to south, (ii) clockwise and (iii) 10% variation in population of delimitation as prescribed by the Act.

5. That according to the latest census results and delimitation rules framed by ECP, average population for each constituency falling in district Gujranwala should be kept in the range of 835,699, whereas the population of former constituency NA-97 contained 813,315 as mentioned above. Keeping in view the admissible variation of 10%, composition of former constituency NA-97 should have been kept intact and renumbered as NA-80, Gujranwala-II.

6. That most unfortunately the area withdrawn from former NA-97 contained not only petitioner's residence but 8/9 union councils as aforementioned without any lawful justification and have been rather allocated to NA-81. Whereas only such areas should have been placed in NA-81, which are geographically contiguous to that constituency, otherwise not part of NA-97.

7. Without disturbing former NA-97, former constituency NA-96 had a population of 618,345 as per latest census and for that matter deficiency of 217,354 had to be added in to it. This could have been done by adding adjacent areas of defunct constituency i.e. NA-98 without disturbing NA-80, Gujranwala-II.

(Maps of former constituencies including NA-97, NA-96 & NA-98 are annexed as Annex-IV)

8. That former constituency NA-97 was in a compact shape holding almost admissible population and there was absolutely no justification in disturbing the same. This area was kept intact since year 2002 i.e. for the last three general elections for the National Assembly. The people in that area, geographically, culturally and socially had built very strong bond and interests among themselves. In view thereof, there was no reason to disturb the coherence of the population of the said area. The proposed delimitation of constituencies by ECP in NA-81[former NA-96] and NA-82 [former NA-95] are carved-out in the direction of east and west instead of north and south in clear violation of delimitation principles enshrined under the Act.

(Maps of NA-81 and NA-82 are annexed as Annex-V)

9. That according to the Election Laws, the constituencies were to be formed from north to south and clockwise fashion whereby the proposed delimitations by ECP have violated this prescribed pattern. However if any adjustment of population was necessary it could have been done by adding from the adjoining patwar circles. It may also be noted that population of NA-84 consists of only 793,857. The proposed delimitation by ECP is again repugnant to section 20(3) of the Act, whereas in district Gujranwala's one constituency NA-84 is proposed with population of 793,857 and another constituency NA-82 Gujranwala-IV is proposed with population of 867,145.

(The petitioner's proposals with regard to new delimitations are annexed as Annex-VI)

10. That the proposed constituencies have disturbed population of the entire area of formally NA-97 which should have been placed in present NA-80 (Gujranwala-II) so much so that numerous persons from that constituency who have been contesting elections in the past under local government, chairmen and councilors are extremely upset and some of them have filed their objections with this forum.

PRAYER

In view of the foregoing, it is most respectfully prayed that:


- I. Former constituency NA-97[proposed NA-80/Gujranwala-II] may kindly be constituted on the basis of (a) census charges 8-12 and 38 (b) Qanongoi Halqa Rahwali (c) Adjoining Patwar Circles Qanongoi Qilla Didar Singh and (d) Gujranwala Cantonment in accordance with the three cardinal principles of delimitations as enshrined under Act and rules made thereunder.
- II. The annexed proposals (Annex-VI) of the petitioner as regard delimitation of his constituency NA-97[proposed NA-80/Gujranwala-II] may kindly be considered and approved accordingly.

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And any other relief this forum may kindly grant in the interest of justice and fair play.

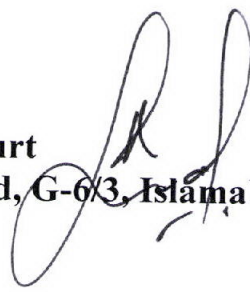
Petitioner

Vdc = 200
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Verification:

The petitioner does hereby verify on oath that the contents of the instant petition are true to best of his knowledge and belief and nothing has been concealed or falsely stated.

Verified at ISB this day 02 Apr of 2018.


2/4/18