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**BEFORE THE DELIMITATION AUTHORITY,  
ELECTION COMMISSION OF PAKISTAN**

Through : The Secretary,  
Election Commission of Pakistan,  
**Islamabad.**

**REPRESENTATION UNDER SECTION 21 OF THE ELECTION ACT  
2017, READ WITH RULE 12 OF THE ELECTION RULES 2017 IN  
RESPECT OF DELIMITATION OF CONSTITUENCIES OF NATIONAL  
ASSEMBLY OF DISTRICT GUJRANWALA, PARTICULARLY  
CONCERNING PROPOSED CONSTITUENCIES NA-81 AND NA-82.**

I, Muhammad Arshad Farooq S/o Muhammad Ashraf, R/o Hafizabad Road, Street No: 4-B, Mohallah Abadi Mehar Laal Hussain District Gujranwala, voter of Gujranwala district (copy of CNIC and voter certificate attached), hereby submit my observations:-

Respectfully Submitted:

- 1) That the instant representation is being filed by the petitioner being a voter member of Constituency No: 82 of Gujranwala District which was notified as NA-95 in General Election 2013.
- 2) That 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 Gujranwala. The map of preliminary proposal which was provided by the Election Commission of Pakistan is attached as **Annexure A.**
- 3) That the preliminary delimitation issued by Election Commission of Pakistan is in cheer violation of statutory principles of delimitation as enshrined in section 20 The Election Act 2017 alongwith dictums laid down by the Superior Courts of the country, thus it is deemed necessary to amend/ alter/ modify the preliminary proposals issued by Election Commission of Pakistan.

- 4) That, according to the present schedule and maps of the newly proposed constituencies, some of the charges of NA-82 are added in NA-81 and vice versa. The petitioner being the voter member of the said constituency is constrained to file certain objections over the said allocation of charges in NA-82 and to propose an adequate proposal for the said constituency.
- 5) That, the total voter members of the said constituency as notified by the Election Commission of Pakistan are 867145 by making certain changes in the charges, the detail of which is given below.

### NA-82

a) The following Areas of Gujranwala Municipal Corporation

1. Charge No.21	80080
2. Charge No.22 excluding Circle No.10,13 and 15 (278701-62898=215803)	215803
3. Charge No.23	20473
4. Charge No.24	12428
5. Charge No.25	37939
6. Charge No.26	24897
7. Charge No.27	97015
8. Charge No.28	88045
9. Charge No.29	60812
10. Charge No.30	28745
11. Charge No.31	15652
12. Charge No.35	22866
13. Charge No.36	104689
14. Charge No.37	57701

of Gujranwala District

<b>TOTAL</b>	<b>867145</b>
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6) That, according to the present formation of constituency, the charges No: 15/17/18/19/20/32 were added to NA-82 from Na-81 wrongfully and illegally, just to effect the mind set of general voters.

7) That, Similarly, the charges no: 29/30/31/35/36/37 were excluded from NA-82 and were included in NA-81 in order to balance the number of voters.

8) That the proposed chart for the constituency as proposed by the petitioner is as follows;

The following Census Charges of Gujranwala Municipal Corporation:-

i) Charge No.15	51143
ii) Charge No.17	35194
iii) Charge No.18	36354
iv) Charge No.19	80871
v) Charge No.20	68564
vi) Charge No.21	80080
vii) Charge No.22 excluding Circle No.10,13 and15 (278701-62898=215803)	215803
viii) Charge No.23	20473
ix) Charge No.24	12428
x) Charge No.25	37939
xi) Charge No.26	24897
xii) Charge No.27	97015
xiii) Charge No.28	88045
xiv) Charge No.32	12783

<b>TOTAL</b>	<b>861589</b>
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9) That, the proposal made by the petitioner does not change the boundary of constituency as the number of voters according to proposed addition and subtraction is almost same. (Copy of proposed map is annexed as Annexure B).

10) That, a combine reading of section 20 of the election act 2017 and rule 10 of the election rules 2017, it is crystal clear that the following principles and procedure are to be adopted while delimiting the constituencies.

- i. Distribution of population in geographically compact areas
- ii. Physical feature
- iii. Existing boundaries of administrative units
- iv. Facilities of communication
- v. Public convenience
- vi. Other cognate factors to ensure homogeneity
- vii. The delimitation of constituencies of an assembly shall start from northern end of the district and
- viii. Then it will proceed clock wise in zigzag manner keeping in view that population among the constituencies of an assembly shall remain as close as may be practicable
- ix. The variation in population between two or more constituencies shall not ordinarily exceed ten percent.

11) That, while preparing the preliminary delimitation report 2018 comprising of proposals for fresh delimitation of constituencies for national assembly in Gujranwala District especially proposed NA-81 and NA-82, it is

humbly submitted that the concerned delimitation committee has miserably failed to adopt the above mentioned mandatory principles and procedure in letter and spirit which fact is ultimately inviting a need revisit the said delimitation proposal by this commission.

- 12) That, while preparing delimitation report for proposed constituency NA-82 (formerly NA-95), the delimitation committee excluded the charges Nos: 29/30/31/35/36/37 from NA-82 which factor is quite against the guiding principles as geographical compactness, facilities of communication and public convenience.
- 13) That, similarly, chargeNos: 15/17/18/19/20/32 were excluded from NA-81 and have wrongly been included to proposed NA-82 as a result of non-application of mind by the relevant delimitation committee because such inclusion and exclusion is a blatant violation of principles of delimitation as mandated by section 20 of election act 2017.
- 14) That these circles do not form a geographical compact part of proposed NA-82 and such inclusion/ exclusion has been made in violation of principle of distribution of population in geographically compact areas.
- 15) That, the circles of proposed constituency do not form a geographically compact area of the proposed NA-82 and badly suffer from lack of facilities of communication and principle of public convenience.

- 16) That, in this regard, the general public of District Gujranwala protested and print media also published the same in different newspapers, but no action ever taken by the Election Commission of Pakistan. (Copies of news paper clippings are annexed as Annexure C).
- 17) That, if the proposal for delimitation of NA-82 made by the delimitation committee in its preliminary delimitation report 2018 is finalized without allowing the suggested amendments and modifications, the entire population of the above said circle would suffer an irreparable loss and hardships and their miseries would increase manifold.
- 18) That the modifications suggested by the petitioner are for the sole purpose of providing facilities and ease to the inhabitants of the said area.

In these circumstances, it is most respectfully prayed that the preliminary proposal may kindly be amended as per the suggested amendments and charge nos: 15/17/18/19/20/32 may kindly be included in NA-82 and charge Nos: 29/30/31/35/36/37 may kindly be excluded from NA-82, which is quite in interest of Justice.

**Petitioner**

**Through:**

**Syed Tayyab Mahmood Jafri**  
Advocate Supreme Court of Pakistan  
C.C No: PKS 2370

**Rana Asad Hameed**  
Advocate High Court  
C.C No: PNS 43631  
3- Turner Road Lahore