BEFORE THE HONOURABLE ELECTION COMMISSION OF PAKISTAN

1/03/04/2018

Representation No _____/2018

REPRESENTATION

UNDER SECTION 21(3) OF THE ELECTION ACT, 2017 READ WITH RULE 12 AND 13 OF THE ELCTION RULES-2017 FOR ALTERATION/MODIFICATION IN THE DELIMITATION OF CONSTITUENCIES PP 114 & PP 115 OF THE TEHSIL & DISTRICT FAISALABAD.

Respectfully Sheweth,

- 1. That the undersigned is a registered voter of PP 114, NA 109 of Faisalabad District.
- That the Election Commission of Pakistan and the Delimitation Committee Constituted by the Election Commission of Pakistan is to follow the principle as described in Section 20 of the Election Act, 2017 for delimitation of constituencies for National and Provincial Assembly, which is reproduced as below
 - 20. Principles of delimitation. __(1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.
- 3. That the District Faisalabad has lost one Provincial Assembly seat as the total population of district Faisalabad is 78, 73, 910 according to the latest census conducted in 2017. The delimitation of constituencies in Faisalabad has got great importance as any unfair practice shall question the whole electoral process negatively.

4. That the following principles are to be followed while finalizing the delimitation of constituencies under Section 20 of the Election Act-2017.

- i. Distribution of population in geographically compact areas
- ii. Physical features
- iii. Existing boundaries of administrative units,
- Facilities of communication and public convenience
- v. Cognate factors to ensure homogeneity in the creation of constituencies.
- 5. That the preliminary delimitation of constituencies published by Election Commission of Pakistan will cause serious inconvenience to the public at large of District Faisalabad, if same are not altered or modified in accordance with the provisions of the Election Act-2017.
- 6. That the detailed delimitation plan of the constituencies PP 114, PP 115, PP 107 according to the report of delimitation committee is annexed as **ANNEXURE A**.
- 7. That the according to the old delimitation plan the constituency PP 114 was constituency PP 70 which was comprised of an area between (Samundri Road to Jhang Road) consist of 20 UCs Number 101 to 120 of Municipal corporation of Faisalabad and that area was one sided Geographically compact area including existing boundaries of administrative units now the constituency PP 114 is consist of Charge No. 44 to Charge No. 51 the delimitation plan in annex plan is **ANNEXURE B**.
- 8. That in present delimitation plan of the constituencies PP 114 the previous area consists of 6 UCs No. 112 to 117 charge No. 52 to 53 is excluded from the constituency PP 114 & included this area into the constituency PP 115 which is entirely different from every aspect geographically compact area etc.
- 9. Alternatively 6 UCs No. 92 to 95 and 78, 79 (Charge No. 44, 45, 46) of the municipal corporation Faisalabad which should be excluded from the constituency PP 114 which is also entirely different from every aspect and against the principle given in section 20 of the election act 2017 & which is against the parameter of election 2018 given in section 20 of election Act 2017 & is causing great confusion and uncertainty among the public at large.
- That the PP 114 is comprised of an area of 20 UCs municipal corporation Faisalabad among the Samundri Road to Jhang Road side.

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11. That the undersigned is willing to propose a delimitation plan that is most suited in terms of Section 20 of the Election Act 2017.

PROPOSED PLAN

Area of charge no. 52 to 54 comprising of six UCs of Faisalabad municipal corporation may be excluded from constituency PP 115 and included into the constituency PP 114 as previously part of the old PP 70 and may be reinstated as before.

Furthermore the charge No. 44 to 46 comprising of six UCs No. 92 to 95 & 78, 79 of the municipal corporation Faisalabad may be excluded from constituency PP 114 which is entirely different side from every aspect and against the principle of the said section.

For this alteration and change PP 114 will be comprised of an area according to the formality of election 2018.

PP 114 Faisalabad Primary Constituency

The following Census Charges of

Faisalabad Municipal Corporation:

- i. Charge No. 44
- ii. Charge No. 45
- iii. Charge No. 46
- iv. Charge No. 47
- v. Charge No. 48
- vi. Charge No. 49
- vii. Charge No. 50
- viii. Charge No. 51

Total

363267

1/3/1/2

4

PP 114 Faisalabad Proposed

The following Census Charges of Faisalabad Municipal Corporation:

i. Charge No. 47

ii. Charge No. 48

iii. Charge No. 49

iv. Charge No. 50

v. Charge No. 51

vi. Charge No. 52

vii. Charge No. 53

viii. Charge No. 54

Of Faisalabad District

Total

344707

- 12. That it is humbly submitted that delimitation of constituencies may be in accordance with the submitted plan based on solid reasons. The maps of proposed delimitation plan are annexed with the representation.
- 13. The above mentioned submissions are according to the principles of natural justice and fair play and also in accordance with the Section 20, 21 of the Election Act 2017 and relevant Rules.

Prayer

The above delimitation plan may be considered by the Provincial Delimitation Committee and Election Commission of Pakistan to ensure the transparency of the process and implement the relevant law & rules (Election Act 2017) in its true letter and spirit.

Any other relief to which the petitioner is found entitle may also be granted.

Babar Shahzad Ali Hashmi Advocate High Court 0323-6677857 0308-4258687 **PETITIONER**

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