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BEFORE THE ELECTION COMMISSION OF PAKISTAN
ISLAMABAD

Representation Petition No. _____ / 2018

Before:

The Secretary (ECP) Secretariat, Election House,
Constitution Avenue, G-5/2, Islamabad.

On behalf of:

1. Mattharul Haq Malik son of Naseer-ul-Haq Malik, resident of House No.10, Street No.13, Mohallah Mujahidabad, Mughalpura, Lahore.
2. Muhammad Saeed Malik son of Malik Mir Baz Khan, resident of House No.22, Street No.2, Mohallah Mustafa Park, Shalimar Link Road, Lahore
3. Sharafat Ali son of Liaqat Ali, resident of House No.13, Street No.4-A, Mohallah Kotli Pir Abdul Rehman, Baghbanpura, Lahore Cantt.
4. Muhammad Farooq Khan son of Muhammad Younas Khan, resident of House No.493, Street No.40, Mohallah Mujahidabad Colony, Mughalpura, Lahore Cantt.

...Applicants/Petitioners

REPRESENTATION UNDER SECTION 21(3) OF THE
ELECTION ACT 2017 READ WITH RULE 11 (4) OF THE
ELECTION RULES 2017 FOR THE DE-LIMITATION OF
THE PROPOSED CONSTITUENCIES NO.NA-127 and NA-
128, LAHORE IN THE PRELIMINARY REPORT

ABSTRACT

The old NA-124 Lahore has been reconstituted and the proposed constituency NA-128 has been reported and is the subject matter of the instant petition. The petitioners being the concerned/ relevant and effected representatives submits for:

Charge No. No.26108, 26019, 26020, and 26021 having Population of 1,38,464 being proposed in NA-127 and be removed and added into NA-128 and furthermore the charge bearing No.18502 and 26025 having population of 75031 presently are in NA-128 may be added in NA-127 for the following grounds:

GROUND

- (a) That the petitioners are enrolled as a voters in the constituency No.NA-127, Lahore.
- (b) That the preliminary delimitation of constituencies has been published through public notice by the respondent. Copy of notice is attached.
- (c) That the preliminary delimitation of constituency NO.NA-127, Lahore is against law, facts, rules, procedures, principles and provisions as well as sections laid down in the delimitation Act 2017.

- (d) That there is gross violation of laws, rules, principles and sections of delimitation rules 2017.
- (e) That the delimitation of NA-127 along with NA-128 Lahore is liable to be rectified to the extent of prayer of the petitioners to meet the ends of justice and to be in accordance with rules, provisions, laws sections laid down in the delimitation Act 2017.
- (f) The natural boundary lines engulfing the subject charges No.26108, 26019, 26020 and 26021 is the Main Shalimar Link Road which ex-facie divides the two Constituencies and as in 2013 this has been taken as the boundary between the old Constituencies. Instead of this main boundary line a small zic-zac street dividing the inhabitants of the charges (area) has caused a lot of public inconvenience and the division/partition being unnatural, inconvenient and against parameters of the Election Laws. The following factors have been totally ignored:
 - i) The Main Shalimar Double Link Road is the natural boundary;

- ii) The administration of these charges No.26108, 26019, 26020 and 26021 are already existing in NA-128;
 - iii) The electricity grid station of the area in NA-128, WAPDA office, SNGPL offices, the complaint offices are in NA-128.
 - iv) The main reason to challenge this is that the local inhabitants will be facing inconvenience to the maximum by crossing over the Main Shalimar Link Road and thus the approach will be a cause of inconvenience to the general public.
- (g) Furthermore since last so many decades these areas have remain a part of the same constituency which is now NA-128.
- (h) The clockwise movement of the constituencies for delimitation is also being violated as in accordance to the ECP Rules and Laws, said people of the charges/areas merits to be included in the proposed NA-128.

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- (i) Affidavits of the local residents as well as the duly elected representatives are annexed in order to proceed for the submissions.

PROPOSAL

a. The Quota Per seat for the province of Punjab and existing population as per 2017 Census is given under:

- i. **Quota per seat = 7,80,000 with 10% plus minus.**
- ii. **Existing Population of NA-128 = 8,19,049**
- iii. **Existing population of NA-127 = 7,66,549**

Therefore the proposed exclusion of Charges No. No.26018, 26019, 26020, and 26021 having Population of 1,38,464 being proposed in NA-127 and be removed and added into NA-128 and furthermore the charge bearing No.18502 and 26025 having population of 75031 presently are in NA-128 may be added in NA-127 does not alter the population distribution of the constituencies; After the above-mentioned purpose the new population for NA-127 and NA-128 shall become;

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i. Existing NA-No. 127 = 8,19,049

➤ By Exclusion of 1,38,464 collective population of Charges No. No.26018, 26019, 26020, and 26021 and by adding the population 75,031 of Charges 18502 and 26025 makes the population of NA-127 = 7,55,616;

ii. Existing Population of NA-128 = 7,66,549

➤ By Addition of 1,38,464 population of Charges No. No.26018, 26019, 26020, and 26021, and by reducing the population of 75,031 of Charges 18502 and 26025 NA-128 makes the population of NA-128 8,29,928 which falls within the Quota.

b. The above mentioned facts and grounds shall make the population distribution of the NA-127 and NA-128 as under

NA No.	Proposed Population Distribution by Election Commission of Pakistan (ECP) for 2018 Election	Proposed/Suggested by The Applicants
127	8,19,049	7,55,616
128	7,66,549	8,29,928

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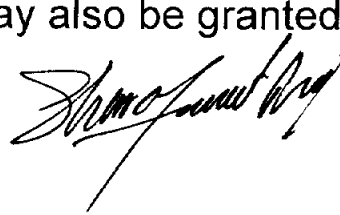
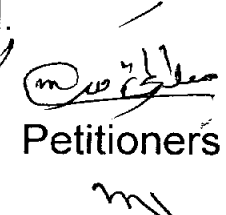
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PRAYER:

Under these circumstances, it is, respectfully prayed:

- i) That the Charge bearing No.26108, 26019, 26020, 26021 may be added in NA-128 from NA-127 and charge bearing No.18502 and Charge No.26025 may be added in NA-127 from NA-128.

Any other equitable relief which this Honourable Court may deem fit and necessary may also be granted.

 
Petitioners

Through Counsel


(MALIK QAMAR AFZAL)
Advocate Supreme Court


(SYEDA SUMMERA NAQVI)
Advocate High Court


(AHMAD RAZA MANGAT)
Advocate High Court


(SAAD KHAN)
Advocate High Court

Dated: 30-03-2018