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That the instant Representation / Objection Petition has arisen out of the following necessary facts;

- 1) That I, Rana Mehran S/O Muhammad Ashfaq, R/O H # 2, Tanki Wala Bazar ,St, # 3, Peeran Mandi Muridke, district Sheikhpura is bona-fide resident and registered voter of Constituency No. PP-136 Sheikhpura-II, as proposed in the Preliminary List of Constituencies.
- 2) That Sialkot district comprising Four Tehsils, i-e, Sheikhpura, Ferozewala, Muridke, Safdarabad and sharkpur summary of the district is given as under;-

Summary of District Sheikhpura

| Name of Area | Population, Census-2017 |
|---|-------------------------|
| District Sheikhpura | 3,460,426 |
| Tehsil Sheikhpura | 1,555,424 |
| Tehsil Muridke | 639,784 |
| Tehsil Ferozewala | 795,498 |
| Tehsil Sharqpur | 197,220 |
| Tehsil Safdar Abad | 272,500 |
| Number of PA Seats allocated | 9 |
| Quota for each PA seat of District | $3,460,426/9=$ |
| Maximum upper limit of Population | 384,492 |
| Maximum Lower limit of Population | 346,000 |
| Maximum permissible variation of population between two or more constituencies of Sheikhpura. | 38,492 |

- 3) That the Election Commission of Pakistan has published Preliminary List of Provincial Assembly Constituencies of district Sheikhpura along-with others districts, by the ECP vide ECP's Notification No. F.8(3)2018-Elec-1, dated the 5th March, 2018. (**Annexure-A, Impugned Notification**)

4) That the ECP has carved out Constituencies of Sheikhpura District from PP -135-Sheikhpura-I to PP- 143 Sheikhpura-XI, as following:-

| No. & Name of constituency | Extent of Constituency | Population |
|---|---|--------------------------------------|
| <p align="center">PP-135 Sheikhpura-I</p> | <p>i. Narang MC ii. The following QHs of Tehsil Murideke: i. Mehta Soja ii. Narang iii. La Dial Adhian iv. Kala Khatai iii. The following QH of Tehsil Ferozewala: (a) Ferozewala-I (b) QH Ferozewala-II excluding the following PCs: i. Wanda La Dial Shah ii. Faizpur Khurd iv. PC Chak No. 46/UCC of QH Kot Pindi Das of The. Ferozewala v. The following PCs of QH Muridke of The. Muridke:- i. Lambhray ii. Tapiala Dost Mohammad iii. Chaurah Rajputan and iv. Nangal Kasuwala,</p> | |
| | <p>Total</p> | <p align="center">376,922</p> |
| <p align="center">PP-136 Sheikhpura-II</p> | <p>(a) Muridke MC (b) Muridke QH excluding the following PCs of Tehsil Muridke: i. Lambhray ii. Tapiala Dost Mohammad iii. Chaurah Rajputan iv. Nangal Kasuwala v. Qila Sattar Shah vi. Wandala Nasir vii. Chuhiwali Khurd</p> | |

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| | <p>(c) The following PCs of QH Sheikhupura of Tehsil Sheikhupura:</p> <ol style="list-style-type: none"> i. Malian Kalan ii. Kheropur Malian iii. Mauje Ki Malian and iv. Qila Amir Singh <p>of Sheikhupura District</p> | |
| | Total | 379495 |
| PP-137 Sheikhupura-III | <ol style="list-style-type: none"> i. QH Kot Pindi Das of Tehsil Ferozewala excluding the following PCs: <ol style="list-style-type: none"> i. Chak No. 46/ucc ii. Mandholi ii. Ferozewala MC iii. Wandala Dial Shah PCs of QH Ferozewala-II of Tehsil Ferozewala iv. Saho Ki Milian PCs of QH Muridke of Tehsil Muridke: <ol style="list-style-type: none"> i. Qila Sattar Shah ii. Wandala Nasir and iii. Chuhiwal Khurd <p>Of Sheikhupura District</p> | |
| | Total | 394130 |
| PP-138 Sheikhupura-IV | <ol style="list-style-type: none"> i. Kot Abdul Malik MC ii. QH Abdul Khair of Tehsil Sharaqpur iii. Faizpur Khurd PC of QH Ferozewala-II of Tehsil Ferozewala iv. Manawali PCs of QH Kot Pindi Das of Tehsil Ferozewala v. The following PCs of QH Dhamke of Tehsil Sharaqpur <ol style="list-style-type: none"> i. Muhammad Pur Dhamke | |

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| | of Sheikhupura District | |
| | Total | 367039 |
| PP-139 Sheikhupura-V | <p>1) Sharaqpur Tehsil excluding following PC: Muhammad Pur Dhamke QH Bahrianwala of Tehsil Sheikhupura excluding following PC:</p> <p>i. Saho Ki Malian</p> <p>2) Charge No. 14 of Muncipal Corporation Sheikhupura</p> | |
| | of Sheikhupura District | |
| | Total | 388626 |
| PP-140 Sheikhupura-VI | <p>a) Sheikhupura MC excluding Charge No. 14</p> | |
| | of Sheikhupura District | |
| | Total | |
| PP-141 Sheikhupura-VII | <p>1) The following QH of Tehsil Sheikhupura:</p> <p>(a) Manawala (b) Bhikki</p> <p>2) Manawala MC</p> <p>3) The following PC of QH Farooqabad of Tehsil Sheikhupura:</p> <p>(a) Botar (b) Dhilwan (c) Baharr (d) Jatrikohna and (e) Nokhar</p> | |
| | of Sheikhupura District | |
| | Total | 401160 |
| PP-142 Sheikhupura-VIII | <p>1) The following QH of Tehsil Sheikhupura:</p> <p>i. Ajnianwala ii. Jandiala Sher Khan</p> | |

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|-------------------------|---|--------|
| | 2) Jandiala Sher Khan TC(Old) 3) QH Sheikhpura excluding following PCs: i. Malian Kalan ii. Khairo Pur Malian iii. Maujo ki Malian iv. Qila Amir Singh 4) Hardo Bandeke PC of QH Farooqabad of Tehsil Sheikhpura Of District Sheikhpura | |
| | Total | 364258 |
| PP-143 Sheikhpura-IX | i. Safdarabad Tehsil ii. Farooqabad MC iii. The following PCs of QH Farooqabad of Farooqabad Tehsil i. Rechand ii. Kot Shonda and iii. Farooqabad Of District Sheikhpura | |
| | Total | 416505 |

1. That going through the above creation or carving out constituencies, it transpires that number of QH of the district have been broken into pieces and patwar circles of one QH has been included more than two constituencies.
2. That out of total 9 Provincial Assembly constituencies 2 constituencies have been created in very odd shape and unsustainable.
3. That clear picture of pick n choose is evident from the creation of PP-135 & 136 Sheikhpura, which has been shown in ECP marked map at **Annexure-B.**
4. That The Constituencies are an example of disapportionment of people & land and violation of compactness.

- 5. That un-necessary breaking of QHs is an indication of mala-fide and creation of illegal, unjustified and unsustainable contituencies in the district of Sheikhupura.
- 6. That the impugned Constituencies are unsustainable *inter-alia* on the following grounds among others;-

GROUNDS

- b) That the constituencies are *de jure* apportionment of space for the purpose of electing representatives of people living in the territorial limits of a democratic state and the elected representatives represent not only the people but also their respective segments of territory, the constituencies.
- c) That these two — the land and the people — and the prevailing law of the country provide the basis for constituency boundaries and their delimitation. The laws concerning constituencies can have two dimensions. The first is related to the laws of enfranchisement as to who among the population have the right to vote. This gives the total number of electors and the number of representatives to be elected and the other aspect of constituencies is the actual drawing of boundaries and enclosing people within the constituency framework. This is indeed a sensitive issue for several reasons.
- d) That first, a lack of understanding of the human geography of the area can divide up people who may in effect lose their representation or voice in the legislature. Second, the division of space into constituencies can be so organised that it may carve out either a safe support base for a party or a candidate, or create a combination of societal forces which are opposed to a particular party or candidate. Thirdly, a new boundary can change the pattern of electoral representation in the legislature.
- e) That different sets of electoral constituency boundaries can produce different election outcomes, even if the underlying vote patterns are identical. Electoral abuses such as ill-proportioned constituencies

(electoral constituency that vary substantially in population) and electoral constituency that have been “gerrymandered” (constituency boundaries intentionally drawn to advantage one political group at the expense of others) can have profound effects on the outcome of an election and the composition of a parliament or an elected body of representatives. If voters and other stakeholders suspect that the constituency boundaries have been unfairly manipulated to produce a particular political outcome, this will affect the credibility of the delimitation process. The legitimacy of the electoral outcome itself could be questioned.

- e) The basic object of delimitation is to secure, so far as practicable, equal representation for equal segments of the population in legislative bodies. Apportionment|| or delimitation or—redistricting|| has the—aim of equalizing the population (or electorate) per seat, in accordance with the principle of one person, one vote, one value. This is usually done with regard to stated constraints of administrative convenience, contiguity, geographical, and communication factors; and unstated influences of party-political advantage. In other words, the delimitation aims at ensuring the observance of the basic tenet of democracy; one man, one vote. The Principles of delimitation under the Election Act, 2017, include having regard to distribution of population in geographically compact areas, existing boundaries of administrative units, facilities of communication and public convenience and other cogent factors to ensure homogeneity in the creation of constituencies.
- f) The other equally important aim of delimitation is to divide the geographic areas into territorial constituencies so fairly that no party or candidate may legitimately have a grievance that there has been gerrymandering of constituencies in favour of or against the interests of any particular party or candidate. Suggesting that the right to cast a ballot is meaningless if that ballot is undervalued relative to a ballot cast by a

voter in a less populated district. Gerrymandering is —drawing of district boundaries so as to favour one's own chances in future elections....

strategies for gerrymandering have been characterized as packing, and cracking, each of which seeks to minimize the influence of those likely to vote for opponents. -- packing when opponents are concentrated in a small number of constituencies; and cracking when opponents are divided between a large number of constituencies

- g) That the **Principle of Delimitation** have been enumerated under section 20 of the Election Act, 2017, which reads as under-

“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.

(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one constituency.

(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.

(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.”

- h) That we can easily identify and enumerate the Principles of Delimitation which law provides to be complied with, respected and implemented in letter and spirit while delimiting the electoral

constituencies, so the not only the candidates but also the voters could be benefited. We can number such principles as under;-

- (d) Distribution of Equal Population,
 - (e) Geographical Compactness,
 - (f) Physical Features,
 - (g) Existing Boundaries of Administrative Units,
 - (h) Facility of Communication,
 - (i) Public Convenience, And
 - (j) Homogeneity,
- i) That procedure for delimiting constituencies has been provided under Sub-rules 3 to 5 of Rule 10 of the Election Rules, 2017, reproduced as under-
- “(3) In preparing draft proposals for delimitation of constituencies, the Delimitation Committee shall follow the principles of delimitation as laid down in section 20, procedure given in this Chapter and the guidelines provided by the Commission from time to time.*
- (4) The constituency for an Assembly shall not ordinarily extend to more than one district except in exceptional circumstances for reasons to be recorded by the Delimitation Committee:*
- Provided that a Patwar Circle or, as the case may be, a Tapedar Circle shall be the basic unit for delimitation and it shall not be broken under any circumstances:*
- Provided further that in case of urban areas census circle shall not be broken under any circumstances.*
- (5) As far as possible, the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or, as the case may be, the agency and then 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 to the quota."

Provided that the quota under this sub-rule shall be determined by dividing total population of the district or the agency with number of seats allocated to that district or agency:

Provided further that the variation in population between two or more constituencies shall not ordinarily exceed ten percent and the Delimitation Committee shall record reasons if, in exceptional circumstances, the variation has to exceed the limit.

- j) That 2 Constituencies of Sheikhpura district mentioned above are those constituencies which have exception of above law, principles and well recognised International practices adhered to while creating constituencies for elections.
- k) That keeping in view the principles as enshrined under the Election Act, 2017 read with Rule 10 of the Election Rules, 2017, a plausible proposal/suggestion has been prepared to rectify the error / mistake for the consideration of the Hon'ble this August Commission.
- k) The proposal / suggestion in respect of PP-135 & PP- 136 has been framed in compliance of principles of delimitation in their entirety and totality. The Proposal meets the Principles of delimitation envisaged under the law of the land and the best International Practices. Proposal as under;-

| No. & Name of constituency | Extent of Constituency | Population |
|--|--|------------|
| <p align="center">PP-135 Sheikhpura-I</p> | <p>1) Narang MC 2) The following QHs of Tehsil Murideke:</p> <ul style="list-style-type: none"> i. Mehta Soja ii. Narang iii. Kala Khatai, and iv. Ahdian excluding Chhawni PC | |

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| | <p>3) The following QH of Tehsil Ferozewala: I. Ferozewala-I excluding Dargai Gilqadeem II. QH Ferozewala-II excluding the following PCs: i. Wandala Dial Shah ii. Faizpur Khurd, and iii. Chak 39 4) The following PCs of QH Muridke :- i. Lambhray ii. Tapiala Dost Mohammad iii. Chaurah Rajputan iv. Nangal Kasuwala, v. Khori, vi. Nangal Sadan, and vii. Pind Muridke of Sheikhupura district</p> | |
| | Total | 368,519 |
| <p>PP-136 Sheikhupura-II</p> | <p>1. 1) Muridke MC, 2. 2) Muridke QH excluding the following PCs of Tehsil Muridke: 3. Lambhray 4. Tapiala Dost Mohammad 5. Chaurah Rajputan 6. Nangal Kasuwala 7. Qila Sattar Shah 8. Wandala Nasir 9. Chuhiwali Khurd 10. Nangal Sadan 11. Khori, and 12. Pind Muridke 13. 3) The following PCs of Pindi Das QH : i. Kala Shah Kako, and ii. Chak 46 4) Chak No. 39 PC of Ferozewala-II QH, 5) Chhawani PC of Ahdian QH, and 6) Dargai Gilqadeem of Ferozewala-I QH, of Sheikhupura District</p> | |
| | Total | 379,122 |

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| <p>PP-137 Sheikhupura- II</p> | <p>1. QH Kot Pindi Das of Tehsil Ferozewala excluding the following PCs: i. Chak No. 46/ucc ii. Mandiali iii. Kala shah kako 2. Ferozewala MC 3. Wandala Dial Shah PCs of QH Ferozewala-II of Tehsil Ferozewala. 4, Saho Ki Milian PCs of QH Bahrian Wala of Tehsil Sheikhupura: 5. The following Pcs of QH Muridke of Tehsil Muridke;- i. Qila Sattar Shah ii. Wandala Nasir , iii. Chuhiwal Khurd, and 6. Qila Amir Singh PC of Shekhupura QH, Of Sheikhupura District</p> | |
| | <p>Total</p> | <p>379,374</p> |
| <p>PP-138 Sheikhupura-IV</p> | <p>i. Kot Abdul Malik MC ii. QH Abdul Khair of Tehsil Sharaqpur iii. Faizpur Khurd PC of QH Ferozewala-II of Tehsil Ferozewala iv. Manawali PCs of QH Kot Pindi Das of Tehsil Ferozewala v. The following PCs of QH Dhamke of Tehsil Sharqpur ii. Muhammad Pur Dhamke of Sheikhupura District</p> | |
| | <p>Total</p> | <p>367,039</p> |
| <p>PP-139 Sheikhupura-V</p> | <p>1) Sharaqpur Tehsil excluding following PC: I. Muhammad Pur Dhamke ,</p> | |

| | | |
|----------------------------|--|---------|
| | 2. QH Bahrianwala of Tehsil Sheikhupura excluding following PC: ii. Saho Ki Malian 2) Charge No. 14 of Muncipal Corporation Sheikhupura of Sheikhupura District | |
| | Total | 388,626 |
| PP-140 Sheikhupura-VI | Sheikhupura MC excluding Charge No. 14 of Sheikhupura District | |
| | Total | 372,291 |
| PP-141 Sheikhupura-VII | 1) The following QH of Tehsil Sheikhupura: (a) Manawala (b) Bhikki 2) Manawala MC 3) The following PC of QH Farooqabad of Tehsil Sheikhupura: (a) Botar (b) Dhilwan (c) Baharr (d) Jatrikohna and (e) Nokhar of Sheikhupura District | |
| | Total | 401,160 |
| PP-142 Sheikhupura-VIII | The following QH of Tehsil Sheikhupura: i. Ajnianwala ii. Jandiala Sher Khan iii. Jandiala Sher Khan TC(Old) 1) QH Sheikhupura excluding following Qila Amir Singh PC: 2) Hardo Bandeke PC of QH Farooqabad of Tehsil Sheikhupura of District Sheikhupura | |
| | Total | 387,790 |

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| PP-143 Sheikhupura-IX | i. Safdarabad Tehsil ii. Farooqabad MC iii. The following PCs of QH Farooqabad of Farooqabad Tehsil iv. Rechand v. Kot Shonda and vi. Farooqabad | |
| | Of District Sheikhupura | |
| | Total | 416,505 |

- m) That suggestion is submitted to avoid gerrymandering in any manner to create a safe constituency for a particular candidate or contestant. The proposal is submitted meets the requirement of law and based on **Principles of Delimitation of Constituencies** for the conduct of free, fair and just elections in district Gujrat as envisaged under the Constitution. Furthermore, the just and fair creation of electoral constituencies is the pre-requisite of just and fair elections, if the constituencies are gerrymandered, the election's results cannot attain legitimacy which resultantly injure the credibility of Parliament and Legislative bodies.
- n) The above proposal has also been supported with map and extent of constituencies. The constituencies demarcated on the map, are geographically compact areas and the population has been distributed almost equally. Whereas all the constituencies ensure complete homogeneity and facility of people. Communication network has dully been kept in view while carving out proposed constituencies of the district Sheikhupura. (Proposed marked Map is at **Annexure-C**)

It is, therefore, very humbly Prayed that the proposal / suggestion submitted may kindly be considered on merits and any type of gerrymandering may be checked and avoided to ensure free, fair and just election in accordance with the constitution and the law and to give level playing fields to all candidates and to promote the essence of democracy and also to attach legitimacy with the elected representatives of the Parliament and provincial Assemblies..

Furthermore, it also humbly prayed that Islands created during the process of drafting of preliminary Constituencies may graciously be finished and constituencies may kindly be ordered to delimited in geographical compact and contiguous areas having regard of equal distribution of Population etc.

Petitioner,

R. Meh

Rana Mehran S/O Muhammad Ashfaq
H # 2 , St, # 3, Peeran Mandi Bazar,
Muridke city, district Sheikhpura.
NIC # 35405-0358435-7

Through

[Signature]

Raja Rizwan Abbasi,
Advocate, High Court,
G-7/1, Islamabad

VERIFICATION

Verified on oath on thi 28th day of March, 2018 at Gujrat that the contents of the above Representation / Objection Petition are true to the best of my knowledge and belief.

R. Meh

Petitioner