

THE SECRETARY, ELECTION COMMISSION OF PAKISTAN,
CONSTITUTION AVENUE ISLAMABAD.

REPRESENTATION/OBJECTIONS WITH RESPECT TO THE
PRELIMINARY DELIMITATION OF PP-137 SHEIKHUPURA, UNDER
SECTION 21/22 OF THE ELECTION ACT, 2017 READ WITH THE
ELECTION RULES, 2017

Respected Sir,

1. The applicant is the registered voter of the electoral area Rachna Town-3, Circle No.2, Tehseel Ferozwala, District Sheikhpura/PP.137 Sheikhpura (the constituency). The copy of the voter's list is appended herewith. The contents of the same may very kindly be considered and read as the part and parcel of this paragraph.
2. This August Commission, on the provisional results of the preceding census, conducted an exercise of delimitation under Article 51 of the Constitution of Pakistan thereafter preliminary proposals with regard to the delimitation of the National and Provincial Assemblies constituencies, and the preliminary delimitation has also been published vide the notification dated 5th March, 2018 (copy attached herewith). District Sheikhpura, has been proposed to be reconstructed/delimited accordingly and it has been divided in 9 provincial assembly seats.
3. That a brief perusal of the proposed delimitation reflects that the it is not in accordance with the law, it is flawed and the committee has failed to abide by the mandatory principles of delimitation and has proposed the exercise on the basis of conjunctures and by disregarding the fundamental requirements that are sine qua non to conduct the exercise of delimitation. Hence the same is being objected on the following;

inappropriate and bad both in law and on facts and seems to have been conducted being oblivion to the principles of delimitation under section 20 of the Election Act 2017 read with the Election rules. Hence liable to be revisited, amended and/or modified forthwith.

- B. That perusal of the proposed delimitation as per the notification and scrutiny of the proposed (marked) MAP, the boundaries of the respective constituencies of the district (appended herewith) reflects that the delimitation committee conducted the exercise without keeping the geographical facts/compactness and territorial actualities in its view and the proposed preliminary delimitation is defeating all the purposes and intents of law relevant in this regard.
- C. That a plane study of the proposed delimitation along with the proposed MAP of the district reflects that the delimitation committee conducted the exercise without following the geographical actualities hence committed errors that in case not amended or altered or disregarded, shall cause problems for the voters of the both constituencies.
- D. That the proposed delimitation lacks geographical compactness and defeats the physical features of the area and also by negating the existing territorial boundaries and it is devoid of cognate features that could ensure homogeneity and symmetry in the proposed constituencies and also by ignoring physical features of the electoral area that will be causing immense hardships in communications.
- E. That according to the proposed preliminary delimitation of Sheikhupura, PP-137 has been demarcated as follows:

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(a) QH Kot Pindi Das of Tehsil Ferozewala excluding

following Pcs:-

i) Chak No,46/UCC;

ii) Mandholi

(b) Ferozwala M.C;

(c) Wandala Dial Shah Pcs of QH ferozwala-ii of Tehsil

Ferozwala

(d) Saho ki Milian Pcs of Qh Baharianwala of Tehsil

Sheikhupura.

The Following Pcs of QH Muridke of Tehsil Muridke:

i. Qila Sattar shah

ii. Wandala Naisr and

iii. Chuhiwal khurd

of Sheikhupura District

Population: 394130

F. That the above referred proposal is flawed, in appropriate that has been carried out being oblivion to the principles of delimitation under section 20 of the Election Act 2017. Hence liable to be revisited forthwith.

That in complete disregard of physical features of the area by ignoring the geographical compactness and existing boundaries. It is important to highlight that Patwar Circle Sahoki Malian is the only Patwar circle of QH Baharianwala (Barianwala) of Tehseel Sheikhupura (having population count of 29333) that has been proposed in the constituency, it will be of benefit to submit that cannot be termed as adjacent and geographically compact area as the said Patwar circle is situated across the canal dividing Tehseel Ferozwala and Sheikhupura. In that case, to reach

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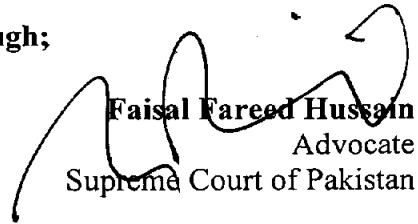
- G. It is submitted that in order to ensure the honest and fair elections under the Constitution and to meet with the legal requirements of law. to balance out the constituencies, to provide level playing field, and to establish geographically compact constituencies by keeping intact, the physical features and existing boundaries of the adjacent nearby areas and to ensure homogeneity, symmetry and to facilitate and with object to ease out the communications between the constituencies to keep the proposed delimitations, would not be practicable in the manner.
- H. In case the exercise of delimitation is to be carried as imperative that may be taken, that may be considered as proposed by the applicant in his proposal that has been attached herewith and may very kindly be considered as part and parcel of the representation in hand and read as integral part of the same. (The counter delimitation proposal is appended herewith).
- I. To appraise this august commission, the preceding proposal has also been highlighted in a map attached with this representation. A bird eye view will give this commission a comprehensive analysis with regard to the delimitation of the constituency, right in accordance with the principles provided in law. It will be pertinent to submit that the preceding proposal do not in any manner frustrate the formula of population in any manner.
- J. In addition, it is also pertinent to highlight the discrepancies in the proposed MAP of constituency PP-137. In the proposed MAP (kindly see) the Patwar circle Chak No.39 reflects to have been broken as Chak No.38 that is the part of the Patwar circle as per the revenue record (appended herewith) is shown as part of PP-136 whereas as per the notification the

In view of the above submissions, it is respectfully prayed that the representation/objection Petition may very kindly be allowed and the constituencies in District Sheikhpura i-e PP.136 and others may very graciously be amended, altered and or modified as proposed by the applicant.



Applicant
Malik Muhammad Iqbal

Through;



Faisal Farzed Hussain
Advocate
Supreme Court of Pakistan

Islamabad;
3rd of April 2018