

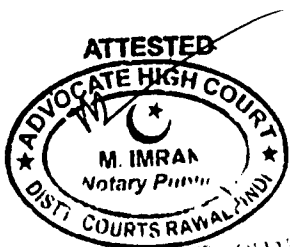
BEFORE THE ELECTION COMMISSION OF PAKISTAN
THROUGH SECRETARY ELECTION COMMISSION,
ISLAMABAD

REPRESENTATION / OBJECTIONS ON DELIMITATION
IN RAWALPINDI CITY PP-15 / PP-16

Respectfully Sheweth:

1. That the applicant / objector is permanent resident of Rawalpindi City and registered voter in old PP-11 / new PP-15, Rawalpindi

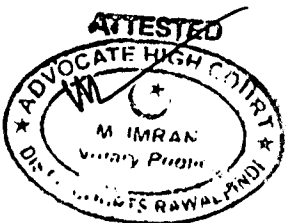
2. That the applicant / objector has the following objections on preliminary report prepared for delimiting Rawalpindi City, particularly old PP-11 / new PP-15 and PP-16
 - i) That before delimiting the constituencies and preparing a preliminary report neither any representations were received nor inquiries were held nor public representatives were consulted nor proper course was adopted and the officials while sitting in their offices have prepared a preliminary report which is



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absolutely unnatural, unfair and violative of provisions of Election Act, 2017.

ii). That according to section 20 of Election Act, 2017, 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 are to be considered while carrying out the delimitation. In the instant case none of these principles were taken into consideration and the constituencies have been delimited in a way which is not only alien to the principles of delimitation but also against the public convenience and natural justice.



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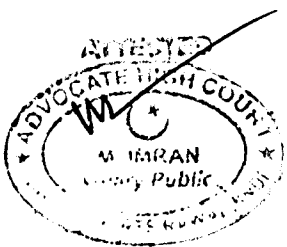
iii). That delimitation and division of provincial constituencies in Rawalpindi City has been made in an unnatural and unreasonable manner through a pick and choose policy

without any solid criteria, particularly PP-15 and PP-16 have not been correctly divided. Some UCs from far away places have been picked up and included in PP-15 whereas some UCs which should have been part of PP-15, have been excluded therefrom and included in other provincial constituencies. Similarly, PP-16 has been made comprising UCs which are not geographically compact areas and it is totally unnatural to keep them in one provincial constituency.

- iv). That the UCs proposed to be included in PP-15 and PP-16 are not otherwise adjacent to each other nor have common factors.
- v). That PP-16 be formed by including following UCs which are adjacent to each other and have facilities of communication and are also in the interest of public convenience:-

UC-7: Pirwadhai

UC-8: Fauji Colony



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UC-9: Bangash Colony, Addta Pirwadhai

UC-10: Khayaban-e-Sir Syed

UC-11: Khayaban-e-Sir Syed

UC-12: Khayaban-e-Sir Syed

~~UC-13:~~

UC-14:

UC-15:

UC-16

UC-33: Kartarpura, Kohati Bazar

UC-34: Bani Chowk

UC-35: Bagh Sardaran

UC-36: Mohan Pura

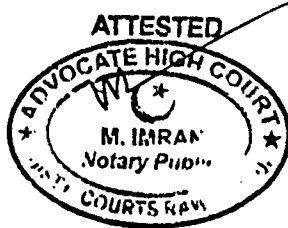
UC-37: Dhok Lal

UC-38: Ganj Mandi

UC-39: Circular Road Mohallah Waris Khan

UC-40: Purna Qila

UC-41: Shah Chan Charagh



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vi). That preliminary report prepared by Election Commission is against the ground realities and law of delimitation, therefore, is not sustainable.

PRAYER:-

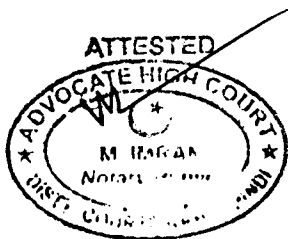
It is, therefore, respectfully submitted that objections mentioned above, be taken into consideration and the delimitation in Rawalpindi be made and PP-16 be constituted comprising UCs mentioned in Para-V whereas remaining UCs be included in PP-15.

Applicant / Objector

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Through:

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