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**BEFORE THE HON'BLE SECRETARY
ELECTION COMMISSION OF PAKISTAN
ISLAMABAD**

Mardan Ali Zaidi, son of Saeed Alam Zaidi, resident of House no.182, shadman Lahore (Chairman UC-198 Shadman Lahore)

Appellant

VERSUS

Delimitation Committee Punjab, PP-160 Lahore XVII.

Respondent

**REPRESENTATION/APEAL UNDER SECTION 21
RULE 12 READ WITH ALL ENABLING PROVISIONS
OF THE ELECTION ACT, 2017 AGAINST THE
DELIMITATION BY THE RESPONDENT**

Respectfully Sheweth:

1. That correct addresses of the parties are incorporated in the caption of the instant appeal for service of process and issuance of any notice / summons by this Hon'ble Authority.
2. That the brief facts leading to filing of instant appeal are that the appellant is a registered voter of PP-160 Lahore-XVII in Electoral Area / Census Block No. 259360106. Respondent has illegally and unlawfully exclude the Charge number 25936, namely Shadman Camp Jail having population, 61,239 from the PP-159, Lahore-V and included into the PP-160 Lahore XVII, and split more than 10% of Electoral Area / Census Blocks/ Constituency with the population of 412,082 similarly respondent illegally, unlawfully included the

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Charge no.25911, namely Model Town, Extension, Peco Road having Population 43,008 from PP-165 Lahore-XXII and included in PP-159, Lahore-V against the instructions issued for delimitation of constituencies of Provincial Assembly and National Assembly under The Election Act, 2017 and the rules made there-under. (Copies of voter certificate (Annex-A), Map issued by the ECP (Annex-B), Marked Map Highlighted issued by ECP, Proposed Marked Map Highlighted (Annex-C & C1) Population Description Chart Original and proposed of Constituencies PP-160 Lahore-XVII, PP-165 Lahore-XXII and PP-159, Lahore-V (Annex-D & D1), are attached herewith).

3. That the appellant prepared a proposed map and detail of equal distribution of population, compactness and public convenience of the adjacent constituencies' i.e. PP-160 Lahore-XVII, PP-165 Lahore-XXII and PP-159, Lahore-V as per law and rules. Copies of purposed Map and detail of population adjustment are attached as above.
4. That the impugned delimitation dated 05-02-2018 is illegal, unlawful and the same is liable to be set aside, inter alia, on the following:-

GROUND

- a) That the impugned delimitation is against the recognized principles of delimitation, including but not limited to the principles of equal distribution of population, geographical compactness, existing boundaries of administrative units, facility of communication and public convenience, even marking is wrong by the Authority and it is therefore, liable to be

- a) declared illegal, unlawful and against the law and rules applicable thereto.

- b) That the respondent has illegally, unlawfully exclude the Charge number 25936, namely Shadman, Camp Jail having population, 61,239 from the PP-159, Lahore-V and included into the PP-160 Lahore XVII, and split more than 10% of Electoral Area / Census Blocks/ Constituency with the population of 412,082 similarly respondent illegally, unlawfully included the Charge no.25911, namely Model Town, Extension, Peco Road having Population 43,008 from PP-165 Lahore-XXII and included in PP-159, Lahore-V against the instructions issued for delimitation of constituencies of Provincial Assembly and National Assembly under The Election Act, 2017 and the rules made there-under and has thereby caused permanent inconvenience and confusion for the residents of the said Constituencies.

- c) That above said proposed area / Charge number 25936, namely Shadman, Camp Jail PP-160 Lahore XVII are connected with PP-159 Lahore-V, similarly Charge no.25911, namely Model Town, Extension, Peco Road also connected with PP-165 Lahore-XXII and according to the 'Extent of Constituency' published by the respondent, it is not connected with the PP-160 and PP-159 respectively Therefore, it is more appropriate if the said Area is made part of PP-159 Lahore-V and PP-165 Lahore-XXII respectively in order to achieve the ends of geographical

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- d) That the impugned delimitation is a result of mala fide and political interference which has overlooked the principles of geographical compactness and public convenience, it is worth mentioning here the old map is also ignored and not considered at the time of delimitation. It is worth mentioning here that the respondent has attached the posh area like Shadman in to the highly thickly populated area like Ichrah against the Election law.
 - e) That under the law, rules and instructions the respondent has no power to delimit the constituencies anti Clock wise.
 - f) That the respondent was duly bound to comply with the instructions for the delimitation of constituencies of Provincial Assemblies and National Assemblies and the same were not followed by him.
 - g) That provisions / instructions for delimitation of constituencies of Provincial Assemblies and National Assemblies under The Election Act, 2017 and Rules made there-under have been flagrantly violated by the respondent.
 - h) That the faulty, illegal and unlawful delimitation conducted by the respondent has disturbed the uniformity and compactness of the Provincial Assemblies and National Assemblies.
 - i) That the respondent has illegally split more than 10% of Electoral Area / Census Blocks.
 - j) That the respondent has no authority to detach the said electoral area from the PP-159 Lahore-V, therefore, he has assumed the jurisdiction not vested in him.

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PRAYER:

In view of the above submissions, it is most respectfully prayed that instant appeal / representation / objection petition may kindly be accepted and impugned delimitation may kindly be set-aside.

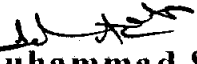
It is further prayed that Area of PP-160 Lahore XVII Charge number 25936, namely Shadman Camp Jail having population, 61,239 be included to the appropriate constituency in PP-159, Lahore-V and the area of PP-159, Lahore-V Charge no.25911, namely Model Town, Extension, Peco Road having Population 43,008 be included to the appropriate PP-165 Lahore-XXII in the supreme interest of justice, equity and fair play.

Any other relief which this Hon'ble Authority deems fit and appropriate under the circumstances may also be awarded to appellant.


Appellant
Mardan Ali Zaidi, s/o
Saeed Alam Zaidi
03218460409

through

Counsel


Hafiz Muhammad Saleem
Advocate High Court
7-Turner Road,
Lahore

Dated: _____