

BEFORE THE ELECTION COMMISSION OF PAKISTAN ISLAMABAD

Representation No. ____ / 2018

Mian Mehmood ur Rashid Son of Mian Muhammad Rashid Resident of 39-A, Rachna Block Allama Iqbal Town, Lahore. Voter No.289, U.C.213, included in PP- 160 & NA-130.

Petitioner

**REPRESENTATION UNDER SECTION 21(3) OF THE ELECTION ACT 2017
READ WITH RULE 12 OF ELECTION RULES 2017 AND OTHER ENABLING
PROVISIONS OF LAW FOR AMENDMENT ALTERATION AND
MODIFICATION OF DELIMITATION OF CONSTITUENCIES PP-160, PP-151 &
PP-167 OF DISTRICT LAHORE (PUNJAB).**

Respectfully Sheweth:-

1. That vide notification No. F8(3)/2018-Elc-I dated 5th March 2018, Honourable Election Commission was pleased to publish, in official Gazzette, for information of general public, preliminary report and the list of constituencies in respect of National Assembly and Provincial Assemblies.
2. That the petitioner Mian Mehmood ur Rashid Son of Mian Muhammad Rashid Resident of 39-A, Rachna Block Allama Iqbal Town, Lahore. Voter No.289, U.C.213., included in PP- 160 & NA-130.

- 02
3. That the petitioner being aggrieved seeks amendment / alteration of delimitation of constituencies of PP-160, PP-151 & PP-167 of Lahore District inter alia on the following:

GROUND

- a. That the new delimitations as published in preliminary report and preliminary list defy the provision of section 20 of the Election Act, 2017 & The Rule 10 & 12 of the Election Rules 2017.
- b. That the constituencies Nos. PP-160 PP-151 & PP-167 have been delimitation in utter disregard to 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.
- c. That according to the notification the existing PP-160 constituency consist of following Charge of Model Town Tehsil:-

PP-160 Lahore XVII.

- a) The following Census Charges of the Model Town Tehsil.

- 1) Charge No. 26
 - 2) Charge No. 27
 - 3) Charge No. 28
 - 4) Charge No. 29
 - 5) Charge No. 30
 - 6) Charge No. 31
 - 7) Charge No. 32
 - 8) Charge No. 33
 - 9) Charge No. 35
 - 10) Charge No. 36 and
 - 11) Charge No. 37
- Of Lahore District.

TOTAL:

412082

PP-151 Lahore VIII.

- b) The following Census Charges of the Lahore City Tehsil.

1. Charge No. 37
2. Charge No. 38
3. Charge No. 39

- 3
4. Charge No. 51
 5. Charge No. 52
 6. Charge No. 53
 7. Charge No. 54
 8. Charge No. 66 and
 9. Charge No. 34 of Model Town Tehsil
Of Lahore District.

TOTAL:

381303

PP-167 Lahore XXIV.

c) The following Census Charges of the Lahore City Tehsil.

1. Charge No. 55
2. Circle No. 4 & 6 of Charge No. 1
Of Lahore District.

TOTAL:

360999

Copies of map of PP-160, PP-151 & PP-167 of District Lahore after delimitation is attached as **Annex: "B"**.

d. That **proposed** delimitation on for **PP-160** is as under:-

PP-160 Lahore XVII.

A. The following Census Charges of the Model Town Tehsil.

1. Charge No. 26
2. Charge No. 27
3. Charge No. 28
4. Charge No. 29
5. Charge No. 30
6. Charge No. 31
7. Charge No. 32
8. Charge No. 33
9. Charge No. 35 excluding Circle No. 1, 2 and 3.
10. Charge No. 36
11. Charge No. 37 excluding Circle No. 1, 2 and 3
12. Charge No. 54 to the extent of Circle 6 & 7 included.
13. Charge No. 66 to the extent of Circle 3 & 4 included.
14. Charge No. 55 to the extent of Circle 6 & 7 included.
Of Lahore District.

TOTAL:

402104

PP-151 Lahore VIII.

B. The following Census Charges of the Lahore City Tehsil.

1. Charge No. 37 to the extent of Circle 1,2, & 3 included.
2. Charge No. 38
3. Charge No. 39
4. Charge No. 51
5. Charge No. 52
6. Charge No. 53
7. Charge No. 54 excluding Circle No. 6 and 7.
also excluding Circle No. 2 and 3.
8. Charge No. 66 excluding Circle No. 3 & 4.
9. Charge No. 34 of Model Town Tehsil.
10. Charge No. 35 To the extent of Circle 1,2 & 3 included.
Of Lahore District.

TOTAL:

389827

Copy of map PP-151 after delimitation is attached as Annex-"B".

PP-167 Lahore XXIV.

C. THE following Census Charges of the Lahore City Tehsil.

1. Charge No. 55 excluding Circle No. 6 & 7.
2. Circle No. 4 & 6 of Charge No. 1
3. Charge No. 54 to the extent of Circle 2 & 3 including.
Of Lahore District.

TOTAL:

361670

Copies of the proposed maps of PP-160, PP-151 & PP-167 of District Lahore are attached as Annex: "B".

- e. That proposed alteration in delimitation of constituencies PP-160, PP-151 & PP-167 are just, proper and necessary for the following:

REASONS

- a. The delimitations have not been made in accordance with the manner, provided by Rule 10(5) of the Election Rules 2017 according to which delimitation of constituencies of an Assembly shall start from northern end of District and then proceed clockwise in a zigzag manner keeping in view population of the constituency.
- b. That according to proposed amendment the area excluded and included in PP-160, PP-151 & PP-167, the distribution of population among all the constituencies have become geographically compact area.

- 157
- c. The existing delimitation of constituencies of PP-160, PP-151 & PP-167 have been made in is clear violation of Rule 10(5) of the Election Rules 2017, because the population among the constituencies shall not remain as close as may be practicable and after the alteration the population shall be remain as close as may be practicable.
 - d. The proportion of population of constituencies have not been kept into consideration while making the delimitation. And after the proposed amendment the population of all three Constituencies will be more closer to each other.
 - e. That according to Notification of Delimitation UC No. 215 of Allama Iqbal Town is divided into three parts and included in three different constituencies i.e. PP-160, PP-151 & PP-167 whereas after the proposed amendment total UC No. 215 included in PP-160 which is much more natural and according to the convenience of the voters.
 - f. That after delimitation natural boundary of Main Multan Road not kept under consideration and only area consisting of 14024 population included in PP-167 after crossing the main Multan Road whereas rest of the total constituency opposite to the other side of the Multan Road.
 - g. That after delimitation natural boundary of Main Multan Road not kept under consideration and only area consisting of 12879 population included in PP-151 after crossing the main Multan Road which is absolutely unnatural.
 - h. That a thin belt of Allama Iqbal Town from the Northern side of PP-160 only area consisting of 16452 population included in PP-151 which was previously in PP-160 since 1988 to up till now which is also unnatural.
 - i. That main graveyard of Allama Iqbal Town (Karim Block) included in PP-167 whereas mostly area of Allama Iqbal Town included in PP-160 which is also unnatural and against the Elections Rules 2017.
 - j. That area of Allama Iqbal Town divided into three parts and included it into three different constituencies which is otherwise always natural part of PP-160 from year 1988 to up till now.

PRAYER:

In view of above submissions it is respectfully prayed that proposed alteration may kindly be accepted and boundaries of PP-160, PP-151 & PP-167 may kindly be adjusted as explained above paras of the representation.

Any other relief which deem fit and appropriate may also be awarded.

Petitioner



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