

To

The Secretary
Election Commission of Pakistan, Islamabad.

Representation No 2018

Rashid Hussain Sindhu son of Ch. Muhammad Yousaf, member Lahore cantonment board, word No 8 R/o House No E-142, St No 2, Muhallaha Bhatta Kohar, Defence Road Lahore Cantt, Lahore. (PP-163, NA-132)
Petitioner

Representation Under Section 21(3) Elections Act 2017 read with Rule 12 Of Election Rules 2017 Regarding Alterations and Modifications In The Preliminary List Of Constituency PP 162 Lahore XIX.

Respectfully Sheweth;

1. That the petitioner is a registered voter of PP-163 Lahore XIX and is intended to contest the forth coming general election. But as per notification No. F8(3)/2018-Elc-I dated 5th March 2018, the area of the above noted whole constituency has been changed without the knowledge of the petitioner in preliminary report of the list of constituencies of Provincial and National Assembly, published by the Election Commission of Pakistan.
2. That the undersigned is aggrieved by the new delimitation and proposed alteration and modification in delimitation of PP-163 without bringing major changes in the constituency of Lahore District inter-alia on the following amongst other:-

GROUND

- a. That the new delimitation as published in preliminary report and preliminary list is against the provisions of section 20 of the Election Act, 2017 read with rule 10 and 12 of Election Rules 2017.
- b. That the petitioner proposes the following changes in the delimitation for free, fair and impartial election and in the interest of justice:-
 - i. That charge 5 of Lahore Cantonment Board may be excluded from PP 162 and NA 131 (marked red in the enclosed map Annexure A) and be included in PP 163 and NA 132. (marked green in the enclosed map Annexure B)
 - ii. Charge 7 of Lahore Cantonment Board may be excluded from PP-163 NA 132 (marked red in the enclosed map Annexure C) and be included in PP 162 and NA 131. (Marked green in the enclosed map Annexure D)

The reasons for the above proposals are as under:-

- (a) Charge 7 of Lahore Cantonment Board (PP-163/NA-132) is contiguous and adjoining with 11 Walton Cantonment Board PP 162/NA-131.
- (b) That according to the map proposed by the ECP, the voters of Charge 5 of Lahore Cantonment Board (PP-

162/NA-131) has no homogeneity and direct access with remaining area of PP-162 / NA-131.

- (c) That main Ghazi Road Bhatta Chowk bifurcates Charge 5 of Lahore Cantonment Board (presently in PP-162/NA-131) from remaining area of PP-162/NA-131, whereas the Charge 7 of Lahore Cantonment Board (PP-163/NA-132) is contiguous to Charge 11 of Walton Cantonment Board (PP-162/NA-131).
- (d) The amendment proposed by the petitioner shall not affect the number of voters, rather it would facilitate the voters from National as well as Provincial Constituencies.
- (e) Charge 5 of Lahore Cantonment Board (PP-162/NA-131) is contiguous to PP-163 / NA-132 and with this amendment the population of both the constituencies shall not be disturbed.
- (f) Charge 5 of Lahore Cantonment Board (PP-162/NA-131) does not have any contiguousness with Charge 11 of Walton Cantonment Board (PP-162/NA-131).
- (g) In case the Charge 7 of Lahore Cantonment Board (PP-163/NA-132) having population 70,433 and Charge 5 of Lahore Cantonment Board (PP-162/NA-131) having population 72,899 are inter exchanged that would not affect the prescribed quota of population of National and Provincial Constituencies. For convenience the existing schedule of population as well as after proposed amendment is as under:-

Existing Population		Proposed Population	
NA-132	7,88,786	NA-132	7,91,252
PP-163	3,61,039	PP-163	3,63,505
NA-131	7,72,182	NA-131	7,69,716
PP-162	3,90,800	PP-162	3,88,340

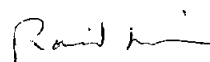
- (h) That the relevant population census would not be disturbed as the same could be retained by bringing minor changes in both constituencies
- (i) That the Geographical and Physical features of Charge 5 of Lahore Cantonment Board (PP-162/NA-131) and Charge 11 of Walton Cantonment Board (PP-162/NA-131) are unnatural and uncomfortable, whereas the geographical and physical features of Charge 7 of Lahore Cantonment Board (PP-163/NA-132) and Charge 11 of Walton Cantonment Board (PP-162/NA-131) are naturally, geographically and physically combined with each other.
- (j) That the proposed amendments will not prejudice the case of any other voter of the constituency rather it will facilitate the voters of the constituency to cast their vote for conduct of free, fair and impartial election.
- (k) That it is in the interest of justice and also expedient for the conduct of free, fair and impartial elections that the proposed amendments be allowed and the constituency be declared with the afore referred proposed amendments.

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- (l) That in the proposed alteration the distribution of the population in geographically compact area will be formed which will result into facilities of the communication within the population and elected person to solve the problem of the area.
- (m) That physical features of the compact area proposed by the petitioner will ultimately create convenience within the population of a compact area and the administration.
- (n) That the boundaries of the proposed alteration and modification will be helping the management of the administration better and effectively without any hurdle as charge No 5 falls far from the remaining area of the PP162, NA 131 while charge No 7 is the adjoining part of the charge 11 having major part of population of the PP162/NA131.
- (o) That there are huge differences in homogeneity of the population of the charge No 5 and the population living in the charge No 7, hence to insure the homogeneity of the population of the charges the alteration proposed by the petitioner has to be accepted in the best interest of the people of the constituency.

PRAYER

In view of the submissions made above, it is respectfully prayed that proposed alterations/modification may kindly be accepted and boundaries of NA-131/ PP-162 and NA-132/PP-163 may be kindly be altered/modified and adjusted for the convenience of the population of both constituencies in accordance with the law and consequently the same may kindly be published in the final list of the constituency.

Any other relief to which the petitioner is found entitled may also be awarded.


Sincerely yours

Rashid Hussain Sindhu
S/o Ch. Muhammad Yousaf,
member Lahore cantonment board,
word No 8, R/o House No E-142, St No
2, Muhallaha Bhatta Kohar, Defence
Road Lahore Cantt, Lahore. (PP-163,
NA-132)

Through

ARSHAD IQBAL TARAR
Advocate High Court
Gudee Trust Building
Thornton Road Lahore.