

BEFORE THE ELECTION COMMISSION OF PAKISTAN
ISLAMABAD

Representation No. _____/2018

Malik Sohaib Farooq Son of Khalid Farooq of UC-252 Post office Khana Nua village Pandoki Tehsil Model Town District Lahore PP-173 and NA-134.

Petitioner

REPRESENTATION UNDER SECTION 21(3) OF THE ELECTION ACT 2017 READ WITH RULE 12 OF ELECTION ACT 2017 AND OTHER ENABLING PROVISIONS OF LAW FOR AMENDMENT ALTERATION AND MODIFICATION OF DELIMITATION OF CONSTITUENCIES PP-173 OF DISTRICT LAHORE.

Respectfully Sheweth,

1. That petitioner is elected Chairman of UC-252 Pandoki Tehsil Model Town District Lahore as per vide notification No. F8(3)/2018-Elc-I dated March 5th

2018, Honorable Election Commission was pleased to publish, in official gazette, for information of general public, preliminary report and the list of constituencies in respect of National and Provincial Assemblies.

2. That the petitioner Malik Sohaib Farooq son of Khalid Farooq voter no.74 of UC-252, Post office Khana Nua village Pandoki Tehsil Model Town District Lahore included in PP-173 And NA-134.
3. That according to the above notification the whole previous constituency PP-159 has been changed and divided into five of provincial constituency. and the constituencies Nos. PP-173, PP-164 and PP-169 have been delimitation in utter disregard to distributed 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 creation of constituencies.
4. That the petitioner being aggrieved by new delimitation and seeks amendment / alteration of delimitation of constituencies of PP-173 and PP-169 of district Lahore inter alia on the following:

GROUND

- a. That the new delimitation is 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 the election rules 2017.
- b. That the amended delimitation the areas of PP-173 (former PP-159) has been added without any justification and totally ignoring the

principle that the old constituency should be distributed into five parts.

- c. That the UC-252 Pandoki is situated in Tehsil Model Town Lahore. According to the notification UC-252 include in the constituency of PP-173. The remaining constituency of the PP-173 is part of Riawind Tehsil so the boundaries of administrative unit are demolished. The residents of UC-252 may be facing so many difficulties in future.
- d. That it is settled law that census circles should not be divided and broken affecting the basic boundaries of the constituencies, whereas the same has been done against the procedure defined by law.
- e. That according to the notification of delimitations UC-252 Pandoki is divided into two parts and included in the two different constituencies whereas after the proposed amendment UC-252 Pandoki included in PP-164 and UC-252 pandoki is in NA134 then it merged in PP-169.
- f. That as per the new delimitation structure, the distribution of the population has be geographically compact area facilitating communication and road approached with the object for public convenience, whereas the same has been overlooked in the process of delimitation. Hence, a suggested proposal is forwarded for the delimitation of PP-169 keeping in view the requirement of the law.
- g. That the facilities of communication are demolished due to opposite direction of constituency. Whereas the UC-252 is adjusted to constituencies PP-169 and it is already in NA-134.



- h. That the public convenience is destroying by distributing the constituencies in opposite direction and the difficulties are increased instead of providing the facilities to the local people.
- i. That the proportions 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 closer to each other.
- j. That all the traditions, livings and communication are attached with PP-169. Because UC-252 Pandoki is the part of Tehsil Model Town and PP-173 is the part of Riawind Tehsil so local resident has no attachment with each other and the above said notification has demolished the Homogeneity.
- k. That the population distribution is incorrect. Whereas the population is more in some constituencies and vice versa. If UC-252 is includes in PP-169 then the population distribution is equal.
- l. That the two villages of UC-252 Pandoki are merged into PP-169 and other should also be includes in PP-169 because PP-169 is the part of Model town Tehsil which is natural according to the convenience of voter.
- m. The delimitation have not been made in accordance with the manner, provided by rule 10(5) of 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.

n. That the according to the proposed amendment the area excluded and included PP-164, PP-169 and PP-173, the distribution of the population among all the constituencies become compact area. The UC-252 Pandoki is geographically is not the part of Constituency PP-173 but it is attached with PP-173 without any justification. Where as it is the part of PP-169 and this consist of following electoral areas which are as follows:

- I. 259030601
- II. 259030602
- III. 259030603
- IV. 259030604
- V. 259030605
- VI. 259030606
- VII. 259030607
- VIII. 259030608
- IX. 259030609
- X. 259030610
- XI. 259030611
- XII. 259030612
- XIII. 259030613

In view of the above submission it is respectfully prayed that proposed alteration may kindly be accepted and the boundaries of PP-169 may kindly adjusted as request of the presentation.

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



Petitioner

MALIK SOHAIB FAROOQ KHOKHAR

Son of Malik Khalid Farooq

Resident of UC-252 Pandoki

Post office Khana Nau village Pandoki Lahore.

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Voter No. #74