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BEFORE THE ELECTION COMMISSION OF PAKISTAN

**Name of the Petitioner: Muhammad Ahmad Qadri S/o
Ghulam Rasool Khan R/o Purana
Kahna, P.O. Khas, Tehsil Model Town,
District Lahore.**

**SUBJECT MATTER: REPRESENTATION AGAINST THE
PRELIMINARY DELIMITATION
PROPOSALS OF PP-164 & PP-173 OF
DISTRICT LAHORE UNDER RULE 12 OF
ELECTION RULES, 2017.**

Respectfully sheweth:

1. That the petitioner is a registered voter of the Union Council Kahna, Tehsil Model Town, District Lahore and his name is duly reflected in the concerned voter list at serial No.222 and Block Code bearing No.259010407. Copy is attached herewith.
2. That initially the petitioner / objector is a voter of PP-164 and is competent to file instant representation.
3. That the petitioner is a political activist, belongs to a political family who has always participated in Election process starting from Union Council till National level.
4. That the constituencies were delimited by the Delimitation Committee which targeted the Union Council of Pandoki which consists on Village Badoki, Pandoki, Khand etc. and the same is bearing Charge No.3, Circle No.1, 2 & 6 of Tehsil Model Town.
5. That the above said area was ousted from the constituency which were remained the part and parcel throughout the

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elections since 1988. The delimitation Committee Punjab delimited the PP-173 as under;

(a) The following census charges of Raiwind Tehsil

1(1) Charge No.4, 6 & 7 of charge no.3

2. Charge No. 4

3 Charge No.5

4 Charge No.6

(b) Circle No.1, 2 & 6 of charge No.3 of Model own
Tehsil


It is pertinent to mention over here that the Union Council of Pandoki is consisting of Census Circles No.1, 2 & 6 of Charge No.3 of Tehsil Model Town. It is pertinent to mention over here that the said three census circles No.1, 2 & 6 of charge No.3 consisting upon population 33,518/- and that very population having no geographical compactness with the PP-173 which is the basic principle enumerated in section 20 of the Elections Act, 2017 which provided that the population should be distributed in geographically compact areas which is violated by the delimitation committee of Punjab while making the proposed delimitations of constituencies PP-173.

6. That the maps which are annexed with the objection petitions clearly shows and also established by the revenue department that the census, circles bearing No.1, 2 & 6 of charge No.3 of Tehsil Model Town is not geographical compact and connected with the PP-173 rather it is geographical compacted with the PP-164. It is pertinent to mention over here that the criteria of the population provided in the principles of delimitation also did not disturb while putting the population in circles No.1, 2 and 6 of Charge No.3 of Tehsil Model Town into PP-164.
7. That another most important factor which is the existing boundaries of Administrative units which is violated by the

delimitation committee only census circles of 1,2 and 6 of charge No.3 of Model Town Tehsil and the same was included in the PP-173, while violating the administrative boundaries of Tehsil Model Town and that is the only area of Tehsil Model Town which was included in PP-173 which is consisting upon Tehsil Raiwind that's why the principle of geographical compactness, distribution of population as well as the existing boundaries of administrative units and facilities of communication, public convenience are violated which could be established by the existing as well as proposed delimitation.

8. That the union council of the Pandoki, Tehsil Model Town was always remained part and parcel of PP-164 which was previously known as PP-159.
9. That if the union council of Pandoki, Tehsil Model Town was not excluded from the PP-173 and included in the PP-164, the population of the area will be suffered an irreparable loss and will be deprived from true representation.

In view of the above proposals, it is therefore prayed by accepting the representation, the census circles No.1, 2 and 6 of charge No.3 Tehsil Model Town may kindly be excluded from PP-173 and included in PP-164 in the supreme interest of justice and fair play.

Through:  PETITIONER
0300-6940887
35201-1072498-1


CH. IRFAN FAJAR
Advocate High Court
13-Fane Road, Lahore.