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

**Bilal Safder** son of **Safdar Ali**, resident of post office Kahna Nu Nagarr  
Sahrif Teshil Cantt district Lahore.

**Appellant**

**VERSUS**

**Delimitation Committee Punjab, PP-169 Lahore-XXVI**

**Respondent**

**REPRESENTATION/APPEAL 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-169 Lahore-XXVI in Electoral Area / Census Block No. 259030503. Respondent has illegally and unlawfully included Charge no.25904, Circle no.1 from the PP-168 Lahore-XXV into the PP-169 Lahore-XXVI Lahore, it is pertinent to mention here that the Charge number 26101, Circle number no.1 namely Ameer Pura, excluded from the PP-169 Lahore and included into the PP-172 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 issued by Revenue Department, Proposed Marked Map (Annex-C & C1) Population Description Chart Original and proposed of Constituencies PP-169 Lahore, PP-168 Lahore, PP-172 Lahore and PP-173 Lahore (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. 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:-

#### GROUNDS

- 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 declared illegal, unlawful and against the law and rules applicable thereto.
- b) That the respondent has illegally, unlawfully included Charge no.25904, Circle no.1 from the PP-168 Lahore-XXV, it is pertinent to mention here that the Charge number 26101, Circle number no.1 namely Ameer Pura, excluded from the PP-169 Lahore-XXVI Lahore and included into the PP-172 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 PP-169 Lahore, PP-168 Lahore, PP-172 Lahore and PP-173 Lahore.

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- c) That above said proposed circles of Charge no.25904, Circle no.1 are connected with PP-168 similarly Charge number 26101, Circle number no.1 namely Ameer Pura, is also connected with PP-169 Lahore-XXVI and according to the 'Extent of Constituency' published by the respondent, it is not connected with said Constituencies. Therefore, it is more appropriate to change the constituencies as per proposed annexures, in order to achieve the ends of geographical compactness and public convenience.
- 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.
- 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. It is pertinent to mention here the area i.e Charge no.25904, Circle no.1 factually this is the part of NA-135 but with the malafide intention the respondent has made the part of PP-169 Lahore-XXVI which the corresponding PP of NA-134.
- 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.

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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 Charge no.25904 i.e Circle no.1 be included in PP-168 Lahore-XXV from the PP-169 Lahore XXVI similarly the area of Charge number 26101 i.e Circle number no.1 namely Ameer Pura be excluded from the PP-172 and be included in PP-169 Lahore-XXVI 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

Through

Counsel

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

Dated: 03-04-2018