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**BEFORE THE ELECTION COMMISSION OF
PAKISTAN ISLAMABAD**

Saad Manzoor S/o Ch. Manzoor Elahi R/o New Abadi
Sultan key, Tehsil Raiwind, District, Lahore.

Representation:

Under Section 21(3) Elections Act 2017 Read, with
Rule 12 of Election Rules 2017 regarding alterations or
modifications in the preliminary list of constituency PP-172
Lahore.

Respectfully Sheweth,

1. That the petitioner is elected vice - Chairman of
Union Council No. 264 and the voter member of the
said constituency. That the whole constituency of
former PP-161 has been changed and divided into
two new constituencies i.e PP-172 and PP-173
without his knowledge in preliminary report of the
list of constituencies of provincial & National
Assembly.
2. That the undersigned is aggrieved by the new
delimitation and seeks amendments in the purpose

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delimitations in PP-172 and PP-173 without bringing major changes in both the constituencies of Lahore District, on the following

G R O U N D S

1. That the new delimitation as published in preliminary report and preliminary list is against the provision of section 20 of election Act, 2017 read with the rule 10 and 12 of the election rules 2017.
2. That the election Commission in delimitation process of PP-172 has divided it in such a way that it has adjusted Unions Councils No. 262 and 264 partially in PP-173. Both these Unions councils should be completely retained in the PP-172 due to their geographical compaction. It is to be noted that both Union councils have been partially adjusted in PP-173 without any justification and reason.
3. That the population required for the relevant population census could be retained by bringing minor changes in PP-172 and PP-173.
4. That as per new delimitation the suggested PP-172 Lahore is as follows:

PP-172 Lahore xxx.
 - a. The following Census charges of Raiwind Tehsil.

- Charge 26101 Chung QH (Excluding circle # 3 & 7)
- Charges # 26102 Manga QH
- Charge # 26103 Maraka QH (Excluding Circle 4, 6 & 7)

TOTAL POPULATION 374,843

Copy of Map – PP-172 after delimitation is attached as Annex-A.

1. That the circles No. 4,6 and 7 of Charge No.3 of Tehsil Raiwind are part of PP-173 after the delimitation process.
2. That the circle No.6 and 7 of charge No.3 are adjacent to each other and if these two circles of charge No.3 are not added to PP-172, the boundaries of whole PP-172 affected badly and disturbed the main Road. Due to this the whole population suffer huge loss of geographical compaction and infrastructure.
3. That the delimitations of both constituencies have not been done as mentioned in rule 10(5) of the election Rules 2017 according to which the delimitation of constituencies of an Assembly shall start from Northern end of the district, or, as the case may be the agency and then proceed clockwise

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in zigzag manner keeping in view that the population among the constituencies of an assembly shall remain as close as may be practicable to the quota. Hence the requirement of law has been overlooked in the delimitation process done by the commission.

4. 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.
5. That as per amended delimitation of PP-172 and PP-173 have mixed the boundaries into each other without any justification and totally ignoring the principle of delimitation process.
6. That the following circles of charge No.3 have wrongly been added in PP-173.

- Circle No.6 and 7 of charge No.3.

- Total population of these circles are as follows:

- $15418 + 16724 = 32142$

11. That as per new delimitation structure, the distribution of population has been geographically compacted area facilitating the communication and roads approached with object for public convenience whereas the same has been over looked in the process of delimitation. Hence

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suggested proposal is forwarded for the delimitation of PP-172 keeping in view the requirement of law.

The proposed PP-172

- a) Chung QH (Excluding circle 3 and 7 of charge 1).
- b) Manga QH (Excluding Circle 1 of Charge 2).
- c) Maraka (Excluding Circle 4 of Charge 3).

TOTAL PROPOSED POPULATION 398087

7. That by adding circle No.6 and 7 of charge No.3 in PP-172, the population of PP-172 increased by 32000 only, whereas after excluding the circle No.1 of charge No.2 of Tehsil Raiwind from PP-172 and included / added in PP-173 the population of PP-173 increased by 8756. These transfer of circles in proposed delimitation brought minor charges in both constituencies and fulfill all the requirements of law.

In view of the above submissions it is respectfully prayed that the proposed alterations may kindly be accepted and adjusted according to the proposal.

Any other relief which this Hon'able commission may deem fit and proper under the facts

and circumstances of case may also be awarded to the
applicant.

Petitioner

Saad Manzoor
S/o Ch. Manzoor Elahi
ID. # 35202-5057632-1
Vote Number: 743
Sultan Key

Through

Ch. Miqdam Manzoor
Advocate High Court

Rao Tariq Mehmood
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