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**BEFORE THE WORTHY SECRETARY ELECTION COMMISSION OF  
PAKISTAN**

Representation No. \_\_\_\_/2018

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**REPRESENTATION UNDER SECTION 21 (2) OF THE ELECTION ACT, 2017  
ON BEHALF OF:**

**ABDULLAH AMJAD SON OF AMJAD ALI, RESIDENT OF CHANDALA  
TEHSIL AND DISTRICT GUJRAT,**

**REGARDING DELIMITATION OF PP-29 GUJRAT-II, PP-30 GUJRAT-III, PP-  
32 GUJRAT-V, PP-33 GUJRAT-VI AND PP-34 GUJRAT-VII**

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**Respectfully Sheweth;**

1. That the Applicant is an Agriculturist by profession. He is resident of Chandala, Tehsil & District Gujrat which falls within limitations of PP-29, Gujrat-II. His vote is registered at Silsala No. 281, Census Block Code No. 171070801, Electoral Area Chandala, Tehsil & District Gujrat.
2. That the Election Commission of Pakistan after conclusion of the Census and publication of its preliminary results carried out the exercise of Delimitation and redrew the boundaries of National and Provincial Assemblies in Punjab. The redrawing of boundaries and the Preliminary Report of Delimitation under **Section 21 (1) of the Election Act, 2017** was published by the Election Commission of Pakistan on 05/03/2018. On the said date the Honourable Election Commission published the preliminary report and the list of constituencies, in respect of National Assembly and Provincial Assemblies. The Honourable Election Commission in order to determine the populace for each of the constituency, has set the quota as **370, 429** persons per constituency for the province of Punjab.
3. That as a result of the Preliminary Delimitation mentioned herein above, Draft List of Constituencies have been published by the Election Commission of Pakistan. As per Preliminary List of Constituencies District Gujrat has been delimited in 7 constituencies for Provincial Assembly i.e. PP-28 Gujrat-I to PP-34 Gujrat-VII. The list of these constituencies, their extent and population are attached as **ANNEXUR-A** Whereas Marked Map of District Gujrat is attached as **ANNEXURE-B**.
4. That the Applicant seeks kind indulgence of this Honourable Commission and prays for amendment, alteration and modification of the geographical boundaries of preliminary constituencies PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII inter-alia on the following;

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**GROUNDS:**

- i. The Honourable Election Commission, while carrying out the exercise of Delimitation has ignored the cardinal principals, as enunciated under **Section 20 of the Election Act, 2017** read with **Rules 10 & 12 of the Election Rules, 2017** along with catena of dictums laid down by the Superior Courts of the Country.
- ii. The physical features and existing boundaries of the administrative units have also been ignored by the Election Commission, while carrying out the exercise of Delimitation with regard to PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII.
- iii. The draft constituencies of PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII, as proposed in the Preliminary Report of Delimitation dated 05/04/2018, are also in negation and contradiction of the other cognate factors and homogeneity of the areas included in the said constituencies.
- iv. The existing boundaries of the administrative units in PP PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII, have also been ignored by the Honourable Election Commission of Pakistan. The facilities of communication and public convenience have also been disregarded, while delimiting, delineating and drawing up the boundaries of the aforesaid constituency. The residents of the said areas will face a lot of difficulty in accessing the representative institutions of their Tehsils.
- v. The Election Commission has also not been properly apprised that Qanoongois and Patwar Circles of PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII have been arranged in such a manner that if the present arrangement of Delimitation remains intact and is not amended, altered and modified, the residents of the said constituencies will face severe difficulty to get their grievances redressed and access facilities of communication and public convenience.

- vi. The Delimitation carried out by the Election Commission also ignored the cardinal principal of geographically compact area.
- vii. The constituencies of PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII as proposed in the Preliminary Report of Delimitation dated 05/04/2018 is unbalanced, uneven and erroneous for the added reason that fundamental principal of facilitating the public at large, bringing governance to the doorstep of common people and instantaneous resolution of their issues. The present arrangement if remained intact and not amended, altered and modified by keeping in view, the geographical compact areas, existing boundaries for administrative units, facilities of communication and public convenience and last but not the least homogeneity will not only lead to inconvenience of the voters/residents but will also result in gerrymandering.
- viii. The applicant most respectfully proposes amended boundaries of PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII, for the purposes:
- a) Division of the each QH in different constituencies may be minimised and whole area of each QH may be put together in one constituency as vide preliminary delimitations area of each QH of the district has been unnecessarily divided in different constituencies which is against the basic principles of delimitation as enshrined in the **Law and Act**.
  - b) Islands created in some constituencies by the preliminary delimitation may be removed.
  - c) QHs may be divided in a manner that the QHs situated on one side of *bhimber nallah* may be included in same constituencies whereas QHs situated on the other side of *bhimber nallah* may be included in other constituency, because *bhimber nallah* passes through areas of PP-29, PP-30, PP-33 & PP-34. By the preliminary delimitation the abovementioned constituencies have been delimited in such a way that each constituency consist of some QHs situated on one side of the *Nallah* and some QHs situated on the other of the *Nallah*. As there are only few bridges on the *bhimber nallah*, therefore, in the presence of preliminary delimitation residents of one constituency have very limited, tough and far from access with each other. In order to make the constituencies convenient and accessible the QHs of each side of the *Bhimber Nallah* may be included in same constituency. In this way each proposed constituency will have the QHs of one side of *Bhimber Nallah*.

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- d) The principles of delimitation including but not limited to principles of equal distribution of population, geographical compactness, existing boundaries of administrative units, facilities of communications and public convenience may be ensured.

The list of **PROPOSED CONSTITUENCIES**, their extent and population are attached as **ANNEXURE-C** Whereas **PROPOSED MAP** of District Gujrat is attached as **ANNEXURE-D**.

5. That the residents of the constituencies PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII are entitled to proper representation in the Punjab Assembly by adhering to the principals stipulated in the **Section 20 of the Election Act, 2017**.
6. That the residents/voters of the area are also apprehensive of the proposed constituencies of PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII, as they will suffer as result of the same and the issues/difficulties being faced by them will increase and remain unattended. They will virtually be unrepresented in the Punjab Assembly.

**PRAYER**

**IT IS, THEREFORE, MOST RESPECTFULLY** prayed that the Honourable Commission may very graciously be pleased to accept the Representation and amend, alter and modify the constituencies of PP-29 Gujrat-II, PP-30 Gujrat-III, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII, as per the spirit of the **Section 20 of the Election Act, 2017 read with Rules 10 & 12 of the Election Rules, 2017**.

*Abdul Aziz Angard.*  
**Applicant**

Through

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