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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:**

**YASIR ARFAT SON OF NAZIR AHMAD BUTT, RESIDENT OF MOHALLA  
SHAD BAGH, LALA MUSA, TEHSIL KHARIAN, DISTRICT GUJRAT,  
REGARDING DELIMITATION OF PP-29 GUJRAT-II, 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 Mohalla Shad Bagh, Lala Musa, Tehsil Kharian, District Gujrat which falls within limitations of PP-33, Gujrat-VI. His vote is registered at Silsala No. 407, Census Block Code No. 172150504, Electoral Area Saida Gol, Tehsil Kharian, 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 is 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-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII inter-alia on the following;

**GROUND:**

- 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-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII.
- iii. The draft constituencies of PP-29 Gujrat-II, 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-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-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-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 following amendments, alteration and modification are necessary to make the delimitation of the constituencies of PP-29 Gujrat-II, PP-32 Gujrat-V, PP-33 Gujrat-VI & PP-34 Gujrat-VII balanced, even, in line with the principles of delimitation as envisaged in the **ACT** and **RULES**:

- a) PC Khwaspur is the part of QH-Lala Musa-I of Tehsil Khaian and is adjacent to the Municipal Committee, Lala Musa but it has been wrongly included in the PP-29 which may be shifted to PP-33 to make it convenient for the residents of this PC. It is worth mentioning that PP-29 consists of the area falling in Tehsil Gujrat whereas PC Khwaspur is located in Tehsil Kharian, therefore principle of maintaining the existing boundaries of Administrative units has also been compromised which needs indulgence of this Honourable Commission.
- b) PC Bazurgwal is part QH Sabour-I of Tehsil Kharian was traditionally part of the constituency now numbered as PP-29, and have the physical features similar to the areas which are part of PP-29, so it is just and proper to include this PC in PP-29 by excluding it from PP-33.
- c) PC Paswal, PC Kotla Qasim Khan & PC Kotla Sarang Khan are part of the QH- Lala Musa-I, Tehsil Kharian are adjacent to the Municipal Committee Lala Musa and have sub urban characteristics of Urban Area of MC Lala Musa but wrongly included in the PP-32, therefore PCs mentioned above may be included in PP-33 by excluding from PP-32 to ensure the observation of principles of delimitation in letter and spirit.

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- d) PC Arah, PC Doga, PC Makwal, PC Sainthal of QH Kharian-II, Tehsil Kharian and PC Marjan of QH Kharian-I, Tehsil Kharian are adjacent to Municipal Committee Kharian and have sub urban characteristics of Urban Area of MC Kharian but wrongly included in the PP-33, therefore PCs mentioned above may be included in PP-32 by excluding from PP-33 to protect the electoral rights of the residents of these PCs as enshrined in the **ACT** and **RULES**.
- e) PC-Galiana-I, PC Galiana-II, PC Malka, are part of QH Kharian-II and have been included in PP-34 in Preliminary Delimitation Report. These PCs have more accessibility with areas fall in PP-33 as compared to PP-34 because Bhimber Nullah exists between these PCs and rest of the population of PP-33, having only some bridges on it which make accessibility very difficult as well as causes inconvenience to the public. Moreover by including these PCs, geographically compactness of PP-33 can be ensured.
- f) To improve the geographical compactness, homogeneity and equal distribution of population of PP-33 and PP-34, PC Langrial, PC Burch-I and PC Burch-II of QH Sabore-II may be included in PP-34 by excluding PP-33. This may also be resulted in reduction of unevenness of these constituencies.
- g) It is respectfully submitted that PCs of QH-Lala Musa-I have been divided in four provincial constituencies i.e. PP-29, PP-30, PP-32 & PP-33 which may cause inconvenience and problems for the residents of these PCs. It is proposed that QH Lala Musa-I except two PCs i.e. PC Chokar Kalan and PC Haji Muhammad which are far from rest of the PCs of this QH may be included in one constituency i.e. PP-33.

The list of **PROPOSED CONSTITUENCIES**, their extent and population is 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-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-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.

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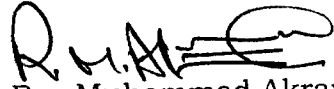
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**PRAYER**

**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-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.**

  
Applicant

Through



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