

Application no. _____/2018

The secretary
Election Commission of Pakistan
Constitution Avenue Islamabad.

Subject:

**REPRESENTATION / objections UNDER SECTION 21(3)
OF THE ELECTION COMMISSION ACT 2017 READ WITH RULE
12 OF ELECTION RULES 2017 AND OTHER ENABLING
PROVISIONS OF LAW FOR AMENDMENT ALTERATION OF
DELIMITATION OF CONSTITUENCIES OF PP-32 & PP-33 OF
DISTRICT GUJRAT**

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Respected sir,

1. That applicant no.1 is a elected general councilor of Municipal committee Kharian and is a bona fide voter of PP-32 district Gujrat, Whereas applicant no.2 took part in the local bodies election 2015 on the seat of General Member and is a bona fide voter of PP-33 district Gujrat (voter certificates of applicants are attached with the instant representation)
2. That vide notification no. F8(3)/2018 Elc-1 dated 5th March 2018, honourable election commission was pleased to publish, in official gazette, for information of general public, preliminary report and the list of constituencies in respect of national assembly and provincial assemblies.
3. That applicants being aggrieved of notification no. F8(3)/2018 Elc-1 dated 5th March 2018 seek amendments of delimitation of constituencies PP-32 & PP-33 of district Gujrat inter alia on the following :

GROUND

1. That delimitations have not been made in accordance with the manner, provided by rule 10(5) of the election rules 2017 according to which delimitation of the constituencies of the assembly shall start

from the northern end of District and then proceed clockwise in a zigzag manner keeping in view population of the constituency. The northern end of district Gujrat is Tehsil Sara-i-Alamgeer, from where the delimitation should have been commenced. But delimitation has been initiated from eastern end of District. So it is vivid violation of rule 10(5) of the election rules 2017.

2. That the new delimitations as published in preliminary report and preliminary list defy the provisions of section 20 of the election act 2017, and the rule 10 and 12 of election rules 2017.
3. That the delimitation of constituencies no. PP-32 & PP-33 have been shown in the preliminary report by the election commission in utter disregard to distribution of population in geographical compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.
4. That delimitation of all the provincial constituencies of district Gujrat speaks volume about the violations of delimitation laws and rules. Where proposed provincial constituencies of district Gujrat by election commission are against delimitation laws and rules, at the same time their proposed delimitation reflects numerous serious discrepancies, loop poles and short comings like absentia of geographical compactness of proposed provincial constituencies, no attachment or ground access of existing boundaries of various PCs with their constituencies example gratia Khoja, Topa Usman and Mughli and chak Mehmood have no land link with rest of PP-32. That is always impediment in public communication and public convenience.
5. That delimitation of all provincial constituencies of district Gujrat has pile of issues and hardships, because Map of district Gujrat proposed by election commission of Pakistan is not up to date according to the latest census and latest record of land revenue. Census report and Map of district Gujrat proposed by election commission of Pakistan are not on one page.

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They both are contradictory to each other. Map of district Gujrat proposed by election commission of Pakistan is mum in toto about the latest PCs of different provincial constituencies of district Gujrat as shown in the census report.

- 6. That the constituencies as proposed by election commission of Pakistan are not geographical compact or contiguous.
- 7. That the constituencies as proposed by election commission of Pakistan are not geographical compact or contiguous. In the constituencies no. PP32 & PP33 as proposed by election commission of Pakistan, Kharian Municipal Committee and Cantonment Kharian which are adjacent to each other, part of parcel of each other and being one unit have been included in two different constituencies while making their unnatural and unlawful partition. Which is highly inconvenient for the dwellers of this city. Cantonment Kharian has been included in PP-33, Whereas municipal committee Kharian has been made a part of PP-32. In this regard our humble proposal is, that Kharian Municipal Committee (39301) of constituency PP-32 may be added to PP-33 and Patwar circles Chakori Sher Ghazi 1 (10674) Chakori Sher Ghazi 2 (8028), Kulewal shahana (6009) and Chak Sakandar no.30 (9935) of PP33 may be added to PP-32. PC choker Klan of QH Lala Musa 1 and PC Sikriali PC Matuanwala of QH Dinga 2 may be shifted from PP30 to PP 32 and PC Machiana and PC Musa Dewana 1 should be shifted from PP29 to PP-30. This is the only way through which isolated PC can be connected to the constituencies. Applicants prepared a proposed map and proposed constituencies i.e PP-32 & PP-33 of district Gujrat as per law and rules keeping in view equal distribution of population, compactness and public convenience, which are as under
PP-32 should be comprised of

i	Dinga Municipal Committee	50802
ii	Dinga 2 QH excluding Tapiala, Waraichanwala, Sikriali & Matuanwala PCs	49131

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iii	Dinga 1 QH	43628
iv	Jaura 1 QH excluding Bagrian Wala, Chakori Bhelowal & Dehkrawali	49559
v	Jaura 2 QH	56798
vi	Lala Musa 1 QH excluding, Sadogal	66457
vii	Following PCS of Kharian QH Dhuni, Mohri, Dhoria, & Burianwali	44151
vii	PC Chak Sakandar no.30 OF Lala Musa 2 QH	9935
	PC sikerali of Dinga 2 of PP30	6409
	Pc Matuanwala of Dinga 2 OF PP30	7625
	Total Population	384495

PP-33 should be comprised

i.	Lala Musa Municipal Committee	91542
ii	Kharian Cantt	48118
iii	The following PCS of Lala Musa -1 QH Sadogal	5886
iv	Lala Musa 2 QH excluding PC Chak Sakandar 30	77388
v	The following PCs of Kharian 2 QH Arah, Bhagwal, Doga, Makwal, Sainthal & Sehna	45560
vi	Kharian 1 QH excluding the following PCs Dhuni, Mohri, Dhoria & Burianwali	37434
vii	Bazurgwal PC of Sabour-1 QH	8916
viii	Sabour 2 of QH	42280
ix	Municipal Committee Kharian	39301
	Total population	396425

(copies of proposed Map is attached with the
instant presentation)

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8. That the faulty, illegal and unlawful delimitation conducted by the election commission has disturbed the uniformity and compactness of the provincial constituencies.
 9. That the appellant humbly seeks permission of this Honourable authority for raising additional grounds at the stage of arguments.

P R A Y E R

In aforementioned circumstances, it is humbly prayed that the instant representation/ objection petition may kindly be accepted and impugned delimitation may kindly be set aside.

Any other relief which this Honourable authority deems fit and proper and which has inadvertently not been prayed for may kindly also be granted.


Applicants

1. **AKHTAR MEHMOOD** son of Muhammad Latif, caste Awan resident of Mohalla Star purra Kharian Tehsil Kharian District Gujrat.
2. **MUHAMMAD TUFAIL** son of Muhammad yousaf, caste Rahmani resident of village Chak Sajawal Tehsil Kharian District Gujrat

Through:

ASIF NAZIR MEHR
Advocate High Court

Akhtar Mehmood



DATED: 03-04-20168

CERTIFICATE:

Certified as per instructions that this is the first representation/objection petition on the subject in this Honourable Authority.

ADVOCATE

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