

Before the Honorable Election Commission of Pakistan
Islamabad

Handwritten signature and date: 03/04/2018

Representation No-----2018

Lala Shakeel Ur Rehman S/o Muhammad Ismail Resident of
Lala House Noshera Road Gujranwala

VS

Election Commission of Pakistan

REPRESENTATION

U/S 21(3) of Election Act 2017 Read With Rule 12 & 13

OF the Election Rules 2017 For Alteration in The

Delimitation Of Constituencies PP-57 & 55 OF the

District Gujranwala

Respectfully Sheweth:

1. That the petitioner is a registered voter of Union Council
(UC) No. MCG 40 and the same UC is the part of PP-57 of

Block Code No- 164250204
Vote No. 478

city Gujranwala. The petitioner is the expected candidate form PP-57 Gujranwala.

2. That as per notification No F8(3)2018 Ele-1 Dated 5th of March 2018, mentioning the above said union council falls in preliminary report of the list of constituencies of provincial (PP-57) and nation assembly (NA-82).

3. That the election commission Pakistan and the delimitation committee constituted by the election commission of Pakistan was bound to follow the principles as described in section 20 of the election act 2017 for the delimitation of constituencies for both national and provincial assembly, which is reproduced as under;

20. Principles of delimitation—(1) "All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative unit, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies"

4. That the delimitation of constituencies in Gujranwala district is of great importance as any unfair practice shall question the whole electoral process negatively, since the initially delimited Provincial constituency PP-57 is almost

8/2/2018

15 km meter long and consists upon 21 union councils which is unjust and unfair u/s 20 of the election act 2017.

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5. That the following principles are to be followed while finalizing the delimitation of constituencies u/s 20 of the election act 2017.

- (i) Distribution of population in geographically compact areas.
- (ii) Physical features.
- (iii) Existing boundaries of administrative units.
- (iv) Facilities of communication and public convenience.
- (v) Cognate factors to ensure homogeneity in the creation of constituencies.

6. That the delimitation plan of the constituencies of city Gujranwala according to the report of delimitation committee is attached herewith as Annexure-A.

7. That the preliminary delimitation of the constituencies published by election commission Pakistan will cause serious inconvenience to the public of the city Gujranwala.

8. That the petitioner is aggrieved by the new delimitation plan and seeks proposed delimitation in PP-57 and others Provincial constituencies of city Gujranwala on the grounds as under;

Grounds

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- (i) That the new delimitation as published in preliminary report and preliminary list is against the provision of section 20 of the election act, 2017 read with rule 10 & 12.
- (ii) That the election commission of Pakistan has delimited PP-57 in such a way that the length of the constituency has become 15 km long which covers few areas unnecessarily which are naturally linked with PP-55 in respect of physical features and existing boundaries of administrative units. These areas had never been part of PP-57.
- (iii) That the population required for a provincial constituency to demark a provincial constituency as per relevant population census could be retained by bringing minor changes in in charges of PP-57 Gujranwala.
- (iv) That as per proposed delimitation, suggested PP-57 Gujranwala and others are as under;

Proposed Plan for Delimitation

Below is the charge wise population of Gujranwala city with respect to the proposed provincial constituencies.

PP-57

JJ/03/04/2018

Charge No	Population
25	37939
26	24897
27	97015
28	88045
29	60812
30	28745
31	15662
Total Population	353,115

PP-55

Charge No	Population
6	27437
21	80086
22	236806 Excluding Circle No 14 & 15
23	20473
24	12428
Total Population	377,230

PP-54

Charge No	Population
14	65136
15	51143

17	35194
18	36354
19	80871
20	68564
22	12885 including circle No: 14

Total Population 350147

PP-56

Charge No	Population
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9	53357
35	22866
36	104689
37	57701
38	153888

Total Population 392501

PP-58

Charge No	Population
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7	13555
8	19336
10	140064
11	37241

2/03/04/2018

13	63725
16	31794
32	12783
33	18711
34	24260

M/07/09/2019

Total Population 361469

Copy of proposed Mp is attached as Annexure -B

9. That the delimitation of constituencies has not been done as mentioned in rule 10 (5). It starts from the northern side of the city and ends at the eastern side of the city which is against the rules stated above. According to the proposed plan the constituencies of the provincial assembly shall remain as may be practicable to the quota and convenience to the public at large.
10. That it is considered that census blocks are indivisible in order to form new provincial or national constituencies and if done so that would be the sheer violation of rules and regulations.
11. That it is humbly submitted that the delimitation of constituencies may be in accordance with the submitted proposed plan based on the solid reason
12. That the above said submissions are according to the principles of the natural justice and fair play and also in

accordance with the Section 20 & 21 of the election act 2017
and relevant rules.

13. That if the constituencies are not delimited as per proposed
plan the voters of city Gujranwala will be seriously
prejudice and got irreparable loss which will sabotage the
principle of justice and fair play.

Prayer

It is Respectfully prayed that the proposed above
said delimitation plan may be considered by the
provincial delimitation committee and election
commission Pakistan to ensure the transparency
of the process and implement to the relevant law
and rules of election act 2017 in the true letter and
spirit.

Any other relief to which petitioner is found
entitled may also be granted.

Regards

Lala Shakeel Ur Rehman

R/O Lala House, Noshera Road

Gujranwala

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03/04/2018