BEFORE THE HON'ABLE COURT ELECTON COMMISSION OF PAKSITAN

ISLAMABAD

Hodals

Representation No. _____/2018

Muhammad Mehboob Wattoo (Advocate High Court) Son of Sana Ullah, resident of Chak No. 363/GB, Tehsil Jaranwala, District Faisalabad,

REPRESENTATION

UNDER SECTION 21(3) OF THE ELECTION ACT. 2017 READ WITH RULE 12 AND 13 OF THE ELECTION RULES-2017 FOR ALTERATION/MODIFICATIONS IN THE DELIMITATION OF CONSTITUENCIES PP 99-100, 101 & 102 OF THE DISTRICT FAISALABAD.

Respectfully Sheweth,

- 1. That the undersigned is a registered voter of Chak No. 363/GB, Vote No. 49, Voter of PP-101 N.A 103 District Faisalabad.
- That the Election Commission of Pakistan and the Delimitation Committee constituted by the Election Commission of Pakistan is to follow the principle as described in Section 20 of the Election Act, 2017 for delimitation of constituencies for National and Provincial Assembly, which is reproduced as below.
 - 20. Principals 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 units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.
- 3. That the District Faisalabad has lost one Provincial Assembly seat as the total population of district Faisalabad is 78,73,910 according to the latest census conducted in 2017. The delimitation of constituencies in Faisalabad

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has got great importance as any unfair practice shall question the whole electoral process negatively.

- That a combined reading of section 20 of the Election Act, 2017 and rule 10 of the Election Rules, 2017 reveals that the following principles and procedures are to be kept in mind at the time of making the delimitation of the constituencies:
- (i) Distribution of population in geographically compact areas.
- ii). Physical features
- iii). Existing boundaries of administrative units.
- iv). Facilities of Communication.
- v). Public convenience
- vi). other cognate factors to ensure homogeneity
- vii). the delimitation of constituencies of an Assembly shall start from the Northern end of the district; and
- viii). Then it will proceed clock-wise in zigzag manner Keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable.
- ix). the variation in population between two or more constituencies shall not ordinarily exceed then percent.
- 5. That the preliminary delimitation of constituencies published by Election commission of Pakistan will cause serious inconvenience to the public at large of District Faisalabad, if same are not altered or modified in accordance with the provisions of the Election Act. 2017.
- That the detailed delimitation plan of the constituencies 99-100-101-102 according to the repot of delimitation committee is annexed as ANNEXURE
 A.
- 7. That the undersigned is willing to propose a delimitation plan that is most suited in terms of Section 20 of the Election Act. 2017.

PROPOSED PLAN

Patwar Circle (PC) 66/GB,69/GB,25/GB and 55/GB of Awagat QH Tehsil Jaranwala may be excluded from the constituency (PP99) as the area is situated in between three constituencies and is very difficult to approach from other areas of PP99. Population of the Patwar Circles is respectively which is annexed

PCs. were historically part of PP100 and PP102 adjacent to other Patwar Circles. Which were part of the same constituency and are closer and easy to approach each other? These Patwar Circles may be added to PP100 and PP102 to balance the population and to make it convenient for the local residents.

Patwar Circle (PC) 94/GB,98/GB,101/GB QH Buchiana and Saddar Jaranwala QH Patwar Circles 59/GB, 62/GB may be added to the PP99. Population of the Patwar Circles is respectively which is annexed

PP99 Faisalabad -III (Proposed)

- a) Khuranwala MC.
- b) The following QH of Jaranwala Tensil.
 - i. Awagat Excluding Following PCs.
 - 1. Chak NO. 66/GB
 - 2. Chak NO. 69/GB
 - 3. Chak NO. 25/GB
 - 4. Chak NO. 55/GB
 - ii. QH Khurranawala Excluding following PCs.
 - 1. Chak No. 72/RB
 - 2. Chak No. 73/RB
 - 3. Chak No. 100/RB
 - 4. Chak No. 103/RB
 - 5. Chak No. 104/RB
 - 6. Chak No. 106/RB
 - 7. Chak No. 149/RB
- c) Following PCs. Faisalabad Saddar-I HQ of Faisalabad Saddar Tehsil.
 - i. Chak No. 209/RB Addl, and
 - ii. Chak No. 228/RB
- d) QH Buchiana Including Following PCs.
 - i. Chak No. 94/GB
 - ii. Chak No. 98/GB
 - iii. Chak No. 101/GB

e) QH Sadar Jaranwala QH Including Following PCs.

i. Chak No. 69/GB

ii. Chak No. 62/GB

Total Population 380337

PROPOSED PLAN

QH. Lundianwala, Buchiana Patwar Circle (PC) 94/GB,98/GB,101/GB, Patwar Circle 565/GB, Patwar Circle 631/GB Chak Hmand QH, Patwar Circle of Jaranwala Sadar QH 59/GB, 62/GB. 534/GB, 625/GB may be excluded from the constituency (PP100) as the area is situated in between three constituencies and is very difficult to approach from other areas of PP100. Population of the Patwar Circles is respectively which is annexed

QHs & PCs. were historically part of PP99 and PP101 adjacent to other Patwar Circles. Which were part of the same constituency and are closer and easy to approach each other? These Patwar Circles may be added to PP99 and PP101 to balance the population and to make it convenient for the local residents.

Jaranwala MC, Jaranwala City QHs, Buchiana QHs Patwar Circle (PC) 124/GB,233/GB,657/GB,624/GB,562/G,591/GB, Patwar Circle of Awagat QH 25/Gb,55/GB, Patwar Circle 631/GB Chak Hamand may be added to the PP100. Population of the Patwar Circles is respectively which is annexed

PP100 Faisalabad –IV (Proposed)

- a) Jaranwala MC.
- b) The following QHs of Jaranwala
 - 1. Jaranwala City
 - 2. Jaranwala Sadar Excluding Following PCs.
 - i. Chak No. 69/GB
 - ii. Chak No. 62/GB
 - iii. Chak No. 534/GB
 - iv. Chak No. 625/GB
 - 3. Awagat QHs Including Following PCs.
 - i. Chak No. 25/GB
 - ii. Chak No. 55/GB
 - 4. Buchiana Including Following PCs.
 - 1. Chak No. 124/GB
 - 2. Chak No. 233/GB
 - 3. Chak No. 657/GB
 - 4. Chak No. 624/GB

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5. Chak No. 562/GB

6. Chak No. 591/GB

Total Population 378134

PROPOSED PLAN

QHs. Jaranwala MC, Jaranwala City may be excluded from the constituency (PP101) as the area is situated in between three constituencies and is very difficult to approach from other areas of PP101. Population of the Patwar Circles is respectively which is annexed

QHs & PCs. were historically part of PP100 adjacent to other Patwar Circles. Which were part of the same constituency and are closer and easy to approach each other? These Patwar Circles may be added to PP100 to balance the population and to make it convenient for the local residents.

Lundianwala QH, Buchiana Patwar Circle 565/GB, Patwar Circle 631/GB Chak Hmand QH, Patwar Circle of Jaranwala Sadar QH 534/GB, 625/GB, Stiana QH PCs. 34/GB, 37/GB, 27/GB may be added to the PP101, Population of the Patwar Circles is respectively which is annexed

PP101 Faisalabad –V (Proposed)

- a) The following QHs of Jaranwala
 - i. Lundianwala
 - ii. Buchiana Including Following PC. 565
 - iii. Satiana Including Following PCs.
 - 1. Chak No. 34/GB
 - 2. Chak No. 37/GB
 - 3. Chak No. 27/GB
 - iv. Chack Hamad Excluding Following PC 631/GB.
 - v. Rodala Road QH Excluding Following PCs
 - 1. Chak 432/GB
 - 2. Chak 366/GB
 - 3. Chak 367/GB
 - vi. Jaranwala Sadar Excluding Following PCs.
 - 1. Chak No. 534/GB
 - 2. Chak No. 625/GB

Of Faisalabad District

Total Population 348776

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PROPOSED PLAN

Stiana QH PCs. 34/GB, 37/GB, 27/GB may be excluded from the constituency (PP102) as the area is situated in between three constituencies and is very difficult to approach from other areas of PP102. Population of the Patwar Circles is respectively which is annexed

QHs & PCs. were historically part of PP102 adjacent to other Patwar Circles. Which were part of the same constituency and are closer and easy to approach each other? These Patwar Circles may be added to PP101 to balance the population and to make it convenient for the local residents.

Awagat QH, Patwar Circle 66/GB,69G/B may be added to the PP102, Population of the Patwar Circles is respectively which is annexed

PP102 Faisalabad -VI (Proposed)

- a) The following QHs of Jaranwala Tehsil
- Satiana Excluding Following PCs
 - 1. Chack No. 27/GB
 - 2. Chack No. 34/GB
 - 3. Chack No. 37/GB
- ii. The Following PSc of Rodala QH
 - 1. Chak No. 432/GB
 - 2. Chak No. 366/GB
 - 3. Chak No. 367/GB
- iii. The Following PSc of Awagat QH
 - 1. Chak No. 66/GB
 - 2. Chak No. 69/GB
- b). Kanian QH of Sumandri Tehsil
- c). The Following PSc of Tandlian QH of Tehsil Tandlianwala
 - 1. Chak No. 401/GB
 - 2. Chak No. 393/GB
 - 3. Chak No. 418/GB
 - 4. Chak No. 422/GB
 - 5. Chak No. 420/GB
 - 6. Chak No. 431/GB
 - 7. Chak No. 594/GB

Of District Faisalabad.



Total Population 364514

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- 8. That it is humbly submitted that the delimitation of constituencies may be in accordance with the submitted plan based on solid reasons. The maps of proposed delimitation plan are annexed with the representation.
- 9. The above mentioned submissions according to the principles of natural justice and fair play and also in accordance with the Section 20,21 of the Election Act. 2017 and relevant Rules.

PRAYER

The above delimitation plan may be considered by the Provincial Delimitation Committee and Election commission of Pakistan to ensure the transparency of the process and implement the relevant law & rules (Election Act. 2017) in its true letter and spirit.

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

Regards,

Muhammad Mehboob Wattoo

(Advocate High Court)

S/O Sana Ullah,

R/O Chak No. 363/GB, Tehsil Jaranwala,

District Faisalabad.

Block Code No. 153050504

Voter No. 49

CNIC No. 33104-1970235-5