

30-3-18
Gulraiz Akhtar
Stamp Vender
District Court Rawalpindi

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M. H. Akhtar
21/3/18

BEFORE ELECTION COMMISSION OF PAKISTAN ISLAMABAD

Chaudhry Faisal Hafeez S/o Muhammad Hafeez Chaudhry
R/o Dhoke Chuahdrian, Village & P.O Bhalakhar, Kallar
Syedan District Rawalpindi

Vs

The Delimitation Officer

**REPRESENTATION/OBJECTION ON DELIMITATION OF
PROVINCIAL ASSEMBLY PP-10 (EX PP-5) DISTRICT
RAWALPINDI.**

Respectfully Sheweth:-

1. That the petitioner/objector is voter member of Village Balakhar Tehsil Kallar Syedan District Rawalpindi.
2. That above said Patwar Circle is part of Kallar Syedan Kanoongi Tehsil Kallar Syedan District Rawalpindi.
3. That this Patwar Circle was part of NA-52, PP-5 Rawalpindi previously. The Provincial Assembly included following Kanoongoies of Tehsil Rawalpindi:-
Saghri, Basali, Banda and Kanoongi Kallar Syedan of Tehsil Kallar Syedan
4. That now Kanoongi Kallar Syedan has been included in PP-7 with Tehsil Kahuta.
5. That the petitioner assails the inclusion of Kanoongi Kallar Syedan in PP-7 on the following amongst other:-

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- a. That our Patwar Circle and most part of our Kanoongoi is comprised of plan area but Tehsil Kahuta is hilly area so it's not homogeneous in kind.
- b. That our Kanoongoi was part of PP-5 with Tehsil Rawalpindi since 2002 and people were satisfied and happy in this constituency.
- c. That proposed constituency PP-10 (Rawalpindi Kanoongoies + Kallar Syedan Kanoongoi) forms more compact constituency geographically.
- d. That now other Kanoongoi of Tehsil Kallar Syedan has been included in Tehsil Gujar Khan PP-8 which shall be restored in ex PP-2 now PP-7. It is worth mentioning here that in present delimitation both the Kanoongoies of Kallar Syedan has been shifted to different Provincial Assemblies without any justification.
- e. That in present delimitation Kanoongoi Sukho of Tehsil Gujjar Khan has been included in previous PP-5 now PP-10 which was part of PP-4 Gujjar Khan. The shifting of Kanoongoi Sukho, Kallar Syedan and Choha Khalsa do not apply to prudent mind and amounts to a futile exercise.
- f. That in case PP-4 is restored and Sukho Kanoongoi is included in PP-9, it will form one constituency of National Assembly and Provincial Assembly in one Tehsil and also under one returning officer.

- g. That it will be more appropriate, convenient and lawful if Choha Khalsa Kanoongoi, Kallar Syedan Kanoongoi and Sukho Kanoongoi is restored in there previous provincial constituencies.
- h. That this restoration will not affect population or any other criteria prescribed under election commission act 2017.
- i. That the present delimitation of Provincial Assembly in Rawalpindi is against Section 20 "Principals of Delimitation" because the constituencies are not geographically compact, physical features, existing boundaries of administrating units, facilities of communication and public convenience have also been ignored.
- j. That the proposal of the Provincial constituencies of district Rawalpindi is annexed as Annexure "A".

It is, therefore, respectfully prayed that instant petition of representation/objection may very graciously be accepted, Choha Khalsa Kanoongoi, Kallar Syedan Kanoongoi and Sukho Kanoongoi may kindly be restored in there previous constituencies as indicated in Annexure "A".



Faisal Hafeez Chaudhry

Through



KAMRAN AZIZ CHAUDHRY
Advocate High Court
Rawalpindi