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**BEFORE THE WORTHY SECRETARY ELECTION COMMISSION  
OF PAKISTAN**

Representation No. \_\_\_\_/2018

**MEMORANDUM OF  
REPRESENTATION UNDER  
SECTION 21 (2) OF THE  
ELECTION ACT, 2017 READ  
WITH RULE 12 OF THE  
ELECTION RULES, 2017, ON  
BEHALF OF MUHAMMAD  
MUJAHID, REGARDING  
DELIMITATION OF (PP-112  
FAISALABAD XVI AND PP-115  
FAISALABAD XIX)**

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Through Counsel

Applicant  
  
**AKHTAR MAHMOOD  
ADVOCATE HIGH COURT  
0333-5206653**

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6 (2)

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  
READ WITH RULE 12 OF THE ELECTION RULES, 2017, ON BEHALF OF  
MUHAMMAD MUJAHID, REGARDING DELIMITATION OF (PP-115) AND PP-  
112)**

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**Respectfully Sheweth;**

1. That the Applicant is an Agriculturist and businessman by profession. He is resident of Old PP-68 (New PP-115). He is also involved in rendering social services to the residents of the area and carry out different philanthropic activities, as well. His voter number/Block Code No. 149370402 and Silsala No. 25 and electoral area is Sohail Abad, Faisalabad.
2. That in 1998, a Census was carried out and the Delimitation of Constituencies was carried out. PP-68 was delimited at the time and the General Elections of 2002 were held. The Constituencies were delimited again in 2007 and 2013, respectively.
3. That on 15/03/2017, Pakistan Bureau of Statistics began the exercise of Census and the same was concluded on 25/05/2017. The Election Commission of Pakistan after conclusion of the Census and its publication 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.
4. That as a result of the Preliminary Report of Delimitation mentioned herein above, PP-115 Faisalabad XIX along with other provincial constituencies has been redrawn and delimited. The new constituencies of PP-115 (Faisalabad-XIX), PP-112 (Faisalabad-XVI), have been established, created and carved out.
5. The preliminary delimitation of PP-115 (Faisalabad-XIX), PP-112 (Faisalabad-XVI) out of the twenty-one constituencies, is as under;

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**(a) The following census charges of Faisalabad Municipal Corporation:**

- PP-112 (Faisalabad-XVI)** i. Charge No.23  
ii. Charge No.27  
iii. Charge No.28  
iv. Charge No.29  
v. Charge No.30  
vi. Charge No.32 and  
vii. Charge No.25

(b) Patwar Circle Chak No.198/RB of Gattwala QH of Faisalabad Sadar Tehsil;

Of District Faisalabad

**Total 390136**

**(a) The following census charges of Faisalabad Municipal Corporation:**

- PP-115 (Faisalabad-XIX)** i) Charge No.37  
ii) Charge No. 52  
iii) Charge No. 53  
iv) Charge No. 54  
v) Charge No. 55  
vi) Charge No. 56  
vii) Charge No. 57  
viii) Charge No. 59  
ix) Charge No. 73 and  
x) Charge No. 4

Of district Faisalabad

**Total 379542**

The report with regard to the District Faisalabad and the map as prepared/displayed by the Honourable Election Commission of Pakistan and Survey of Pakistan are placed as **Annexure-A** to this Representation.

6. That through instant application the applicant assailing the proposed order of delimitation regarding the delimitation of PP-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX) and precise facts giving rise to the filing of the instant application are that the applicant is voter member of constituency PP 112 Faisalabad XVI having every right to poll the vote or contest the election or to observe the delimitation of constituency according to the ground realities and in accordance with the rights and interests of peoples of vicinity.

7. That the Applicant seeks kind indulgence of this Honourable Commission and prays for amendment, alteration and modification of the geographical boundaries of new constituencies of PP-115 (Faisalabad-XIX), PP-112 (Faisalabad -XVI) inter-alia on the following amongst other ground.

**GROUNDS:**

✓ (4)

- 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**.
- 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-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX) through which the local area of Charge No.37 is part and parcel of PP 112 Faisalabad XVI while the area of Charge No.25 is inducted into the jurisdiction of PP 112 Faisalabad which is unjustified, against the factual and natural bifurcation as the Charge No.37 was always the part of PP-112 Faisalabad XVI previously in previous delimitations and the same was according to the rules as well as factual position on spot, more over the Charge No.25 of PP112 Faisalabad XVI should be the part of PP 115 Faisalabad XIX but the present delimitation order is of otherwise and same is liable to be set aside.
- iii. The new constituencies of PP-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX), 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 Administrative Boundaries of PP-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX), as they will have difficulty as facilities of communication and public convenience have been jumbled up in different constituencies.
- v. That by way of impugned proposed act of authorities the areas of revenue states of both the charge No.37 of PP-115 Faisalabad-XIX and Charge No.25 of PP-112 Faisalabad XVI would also bifurcated more over it is to worth mentioning here that the administrative issues shall also be infringed and people of vicinity shall face great agony and more complications in this regard.

✓ (5)

- vi. The Patwar Circles have been divided/bifurcated in such a manner, which is not permissible under the applicable laws, rules and regulations.
- vii. The existing boundaries of the administrative units in PP-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX), 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 Tehsil.
- viii. The Election Commission has also not been properly apprised that Qanoongois and Patwar Circles of PP-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX) 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.
- ix. The Delimitation carried out by the Election Commission also ignored the cardinal principal of geographically compact area.
- x. The constituencies of PP-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX) 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.

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**PROPOSED CONSTITUENCY**

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The constituencies of PP-112 (Faisalabad-XVI), PP-115 (Faisalabad XIX) should be amended, altered and modified as under;

**(a) The following census charges of Faisalabad Municipal Corporation:**

- PP-112 (Faisalabad-XVI)**
- i. Charge No.23
  - ii. Charge No.27
  - iii. Charge No.28
  - iv. Charge No.29
  - v. Charge No.30
  - vi. Charge No.32 and
  - vii. Charge No.37 (in place of Charge No.25 of PP-115)**

(b) Patwar Circle Chak No.198/RB of Gattwala QH of Faisalabad Sadar Tehsil;

Of District Faisalabad

**Total** **396857**

**(a) The following census charges of Faisalabad Municipal Corporation:**

**PP-115 (Faisalabad-XIX)** **i) Charge No.25 (in place of Charge No.37 of PP-112)**

- ii) Charge No. 52
- iii) Charge No. 53
- iv) Charge No. 54
- v) Charge No. 55
- vi) Charge No. 56
- vii) Charge No. 57
- viii) Charge No. 59
- ix) Charge No. 73 and
- x) Charge No. 4

Of district Faisalabad

**Total** **372821**

The Proposal with regard to the District Faisalabad and the map as prepared/displayed by the Applicant are placed as **Annexure-B** to this Representation.

It is pertinent to mention that the proposals for amendment, alteration and modification of the geographical boundaries of new constituencies of PP-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX), are also in compliance and consonance with the quota of **370, 429** persons per constituency for the province of Punjab, as determined by the honourable Election Commission of Pakistan.

<b>S. No.</b>	<b>Constituency</b>	<b>Population</b>
<b>1.</b>	<b>PP-112 Faisalabad XVI</b>	<b>396857</b>
<b>2.</b>	<b>PP 115 Faisalabad XIX</b>	<b>372821</b>

(b) That the residents of the constituencies PP-112 (Faisalabad), PP-115 (Faisalabad) are entitled to proper

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representation in the Punjab Assembly by adhering to the principals stipulated in the **Section 20 of the Election Act, 2017.**

(c) That the residents/voters of the area are also apprehensive of the proposed constituencies of PP-112 (Faisalabad-XVI), PP-115 (Faisalabad-XIX), 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.

**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-112 (Faisalabad), PP-115 (Faisalabad), as per the spirit of the **Section 20 of the Election Act, 2017.**

**Applicant (Muhammad Mujahid)**  
**0302-8615100**

Through Counsel

  
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