Muhammad Aurangzeb Shahid son of Shahadat Ali resident / voter of Chak-No. 286/GB Tehsil & District Toba Tek Singh included in NA-112 and PP-121 of Toba Tek Singh-II.

(Petitioner)

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

REPRESENTATION UNDER SECTION 21(3) OF THE ELECTION ACT 2017
READ WITH RULE 12 OF ELECTION RULES 2017 AND OTHER ENABLING
PROVISIONS OF LAW FOR AMENDMENT ALTERATION AND
MODIFICATION OF DELIMITATION OF CONSTITUENCIES PP-118, PP-120 &
PP-121 OF DISTRICT TOBA TEK SINGH (PUNJAB).

Respectfully Sheweth:-

- That vide notification No. F8(3)/2018-Elc-I dated 5<sup>th</sup> March 2018,
   Honourable Election Commission was pleased to publish, in official Gazzette, for information of general public, preliminary report and the list of constituencies in respect of National Assembly and Provincial Assemblies.
- That the petitioner Muhammad Aurangzeb Shahid son of Shahadat Ali resident / voter of Chak-No. 286/GB Tehsil & District Toba Tek Singh included in NA-112 and PP-121 of Toba Tek Singh-II.

3. That the petitioner being aggrieved seeks amendment of delimitation of constituencies PP-118, PP-120 & PP-121 of Toba Tek Singh District inter alia on the following:

#### **GROUNDS**

- c. That the new delimitations as published in preliminary report and preliminary list defy the provision of section 20 of the Election Act, 2017 & The Rule 10 & 12 of the Election Rules 2017.
- d. That the constituencies Nos. PP-118, PP-120 & PP-121 have been delimitation in utter disregard to 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.
- 4. That according to the notification existing PP-118 Constituency consist of following QHs and PCs of District Toba Tek Singh:

#### PP-118 Toba Tek Singh-I

- (a) The following QH of Tehsil Gojra:
  - i. Nawan Lahore
  - ii. Gojra-I excluding following PCs:-
  - 1. Chak No. 300/JB
  - 2. Chak No. 298/JB and
  - iii. Darsana
- (b) Following PCs of Gojra-II QH:
  - i. Chak No. 280/JB
  - ii. Chak No. 095/JB and
  - iii. Chak No. 361/JB
- (c) The following PCs of T.T.Singh-II QH of Tehsil T.T.Singh:
  - i. Chak No. 389/JB
  - ii. Chak No. 377/JB
- (d) The following PCs of Chohala QH of T.T.Singh Tehsil:-
- i. Chak No. 287/JB

Of Toba Tek Singh District.

Total

345623

5. That the existing PP-120 constituency comprises of:

## PP-120 Toba Tek Singh-III

- (a) Toba Tek Sigh MC
- (b) Following QHs of Tehsil Toba Tek Sigh
- i. Toba Tek Sigh-I
- ii. Toba Tek Sigh-II excluding following PCs
- i. Chak No. 389/JB and
- ii. Chak No. 377/JB
- iii. Chohla QH excluding following PCs:
- i. Chak No. 287/JB and
- ii. Chak No. 302/JB

Of Toba Tek Singh District.

Total

363691

6. That according to the notification the existing PP-121 constituency consist of following QHs of District Toba Tek Sigh:

## PP-121 Toba Tek Singh-IV

- (a) The following QHs of Tehsil T.T.Singh
- i. Rajana
- ii. Khekha and
- iii. Chutiana
- (b) The following PCs of Pir Mahal QH of Tehsil Pir Mahal
- i. Chak No. 332/GB
- ii. Chak No. 327/GB and
- iii. Chak No. 328/GB

Of Toba Tek Singh District.

Total

379408

Copies of existing maps of PP-118, PP-120 & PP-121 are attached as **Annex**: **"A"**.

# That proposed delimitation for PP-118 is as under:

- (a) The following QH of Tehsil Gojra:
  - i. Nawan Lahore
  - ii. Gojra-I excluding following PCs:-
  - 1. Chak No. 300/JB
  - 2. Chak No. 298/JB and
  - iii. Darsana
- (b) Following PCs of Gojra-II QH:
  - i. Chak No. 280/JB
  - ii. Chak No. 095/JB and
  - iii. Chak No. 361/JB
- (c) The following PCs of T.T.Singh-II QH of Tehsil T.T.Singh:
  - i. Chak No. 389/JB
  - ii. Chak No. 377/JB
  - iii. Chak No. 375/JB
- (d) The following PCs of Chohala QH of T.T.Singh Tehsil:
  - i. Chak No. 287/JB
  - ii. Chak No. 302/JB

Of Toba Tek Singh District.

Total

352037

- 7. That proposed delimitation for PP-120 is as under:
  - (a) Toba Tek Singh MC;
  - (b) The following QHs of Tehsil Toba Tek Singh:-
  - i. Toba Tek Singh-I QHs
  - ii. Toba Tek Sigh-II QHs excluding the following PCs
  - i. Chak No. 389/JB
  - ii. Chak No. 377/JB
  - iii. Chak No. 375/JB
  - (c) Chutiana QHs
  - (d) PC 243/GB of Khekha QH of Tehsil Toba Tek Singh.
  - (e) Following PCs of Tehsil Pir Mahal:
  - i. Chak No. 332/GB
  - ii. Chak No. 327/GB
  - iii. Chak No. 328/GB

367459

- 8. That the proposed delimitation for PP-121 are:
  - (a) Chohla QH excluding following PCs
- i. Chak No. 287/JB
- ii. Chak No. 302/JB
  - (b) Rajana QHs
  - (c) Khekha QHs excluding PC Chak No. 243/GB

Total

369226

Copies of proposed map, vote certificate and notification are attached as **Annex: "B", "C" & "D"**.

9. That proposed alteration in delimitation of constituencies PP-118, PP-120 & PP-121 are just, proper and necessary for the following:

#### **REASONS**

- a. The 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 constituencies of an Assembly shall start from northern end of District and then proceed clockwise in a zigzag manner keeping in view population of the constituency.
- b. The existing delimitation of constituencies of PP-118, PP-120 and PP-121 have been made in a clear violation of Rule 10(5) of Election Rules 2017 which contemplates that delimitation shall start from Northern end of the district while the area of both the constituencies exist on east to west, due to which population among the constituencies shall not remain as close as may be practicable.

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- c. That the proposed above amendments were close to the previous delimitation from 1988 to uptill now.
- d. According to new delimitation the length of constituencies No. PP-121 comes to 70 to 80 Km. Whereas according to the proposed delimitation length of constituency comes to 35 Km only which also resembles to the constituency as existed in the year 1988 to 2002 when the Toba Tek Singh District consisted on 6 constituencies of Provincial Assembly.
- e. That according to proposed delimitation distribution of population is geographically compact area and facilitation of communication, road approach is also according to public convenience.

## PRAYER:

In view of above submissions it is respectfully prayed that proposed alteration may kindly be accepted and boundaries of PP-118, PP-120 and PP-121 may kindly be adjusted as explained above paras of the representation.

Any other relief which deem fit and appropriate may also be awarded.

Petitioner

**Muhammad Aurangzeb Shahid** 

son of Shahadat Ali resident / voter of Chak-No. 286/GB Tehsil & District Toba Tek Singh included in NA-112 of Toba Tek Singh-II.

Cell #: 0333-6666295

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# BEFORE THE ELECTION COMMISSION OF PAKISTAN ISLAMABAD

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

AFFIDAVIT OF:

Muhammad Aurangzeb Shahid son of Shahadat Ali resident / voter of Chak-No. 286/GB Tehsil & District Toba Tek Singh included in NA-112 and PP-121 of Toba Tek Singh-II.

I, the above named deponent do hereby solemnly affirm and declare

as under:-

"That the averments contained in the accompanying representation are true and correct to the best of my knowledge and belief."

DEPONENT

## **VERIFICATION:**

Verified on Oath at Lahore on this 26<sup>th</sup> day of March, 2018 that the contents of the above affidavit are true and correct to the best of my knowledge and belief.

ATTESTED

DEPONENT

27/3/018