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**IN THE HONOURABLE ELECTION COMMISSION
OF PAKISTAN, ISLAMABAD**

Rana Ijaz Hussain S/o Mumtaz Ali Khan, R/o Choura Rajputan,
Tehsil Muridkey, District Sheikhupura, Cell No. 0300-8470035

**REPRESENTATION UNDER SECTION 21 (3) OF
ELECTION ACT, 2017, READ WITH RULE 12 OF ELECTION
RULES, 2017, REGARDING ALTERATION/MODIFICATION
IN THE PRELIMINARY LIST OF CONSTITUENCY PP-136,
SHEIKHUPURA**

Respectfully Sheweth:-

1. That the petitioner contested the Election from PP-163, Skeikhupura, (now PP-136, Sheikhupura), for last two times. The said constituency has been divided into 03 constituencies. The petitioner belongs to Village Choura Rajputan, Tehsil Muridkey, District Sheikhupura, which has also been excluded from PP-136, Sheikhupura.
2. That as per Notification No. F8(3)/2018-Elc-I, dated 05.03.2018, the whole constituencies have been changed and divided into different constituencies, without his knowledge in Preliminary Report of the list of constituencies of Provincial as well as National Assemblies.

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3. That the undersigned is aggrieved by the new delimitation and seeks proposed delimitation in PP-135 & 136, without bringing major changes in both the constituencies of Sheikhpura District under following amongst others:-

GROUNDS:-

a) That the delimitation as published in Preliminary Report and Preliminary List is against the Provisions of Section 20 of the Election Act, 2017, read with Rules 10 & 12 of Election Rules, 2017. The Section 20 of Election Act, 2017, is being reproduced as under:-

“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 units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.

(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one Constituency.

(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.

(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission

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shall record reasons thereof in the delimitation order.”

- b) That while formulating the constituencies, the principle laid down in the above referred section of the Act *ibid*, have not been followed at all. The principle of distribution of population in geographically compact areas has been blatantly disregarded and delimitation does not appear to have been proposed by the Delimitation Officer in lawful and bonafide exercise of the powers and duties assigned to him.
- c) That the Delimitation Officer has also flouted the principle, as given in guidelines and instructions issued by the Honourable Election Commission of Pakistan to take all possible case to keep intact the Administrative Boundaries of Tehsils and Qanungo Halqas unless it is necessary to do so to remove the glaring disparity of population amongst various constituencies of the same district. Qanungo Halqas have been demolished and disturbed to different constituencies to suit the interests of specific prospective candidates.
- d) That the constituencies as proposed by the Honourable Election Commission of Pakistan are not geographically compact or contiguous.
- e) That the petitioner has proposed map for delimitation of constituencies of District Shekhupura as **Annexure "A"**. Wherein the population of two Patwar Circles, i.e. Tapyala Dost Muhammad and Choura Rajputan, consists of Mouzas, which are as under:-
 - (i)
 - (1) Tapyala Dost Muhammad, consists of 9104, population
 - (2) Rustam Pura, consists of 1045 population

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- (ii)
- (3) Choura Rajputan, consists of 5570, population
 - (4) Kot Sayyadan, consists of 978, population
 - (5) Mongnan Wala, consists of 257, population

Resultantly, total 16954 population may be added into the constituency in question i.e. PP-136, Sheikhpura, which is quite legal and in accordance with law as per directions of Honourable Election Commission of Pakistan.

- f) That the petitioner is humbly proposing that Patwar Circle Rakh Bawli Jamadar, the population of following Mouzas are as under:-

- 1) Bahman Wala, consists of 221, population
- 2) Rakh Bawli Jamadar, consists of 18694, population

Resultantly, as per proposal of petitioner, the above said total 18915 population of Patwar Circle Rakh Bawli Jamadar may be excluded from the constituency in question i.e. PP-136, Sheikhpura and may be added in the constituency PP-135, Sheikhpura, which will be in the interest of the constituency in question and for the conduct of Elections and according to the Election Rules, 2017.

- g) That as per the Notification No. F8(3)/2018-Elc-I, dated 05.03.2018, Preliminary Report and Preliminary List, the present population of the **constituency in question is 379495**, however, the population of PP-135, Sheikhpura, is 376922.

- h) That after the proposals proposed by the present petitioner, the population of **PP-135, Sheikhpura, would be 359968**. However, the population of **PP-136, Sheikhpura, would be 360580**.

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- i) That it is settled law that census circle should not be divided and broken affecting the basic boundaries of the constituencies, whereas the same has been done against the procedure defined by law.
- j) That the delimitation of constituencies have not been done in accordance with the mentioned Rule 10 (5) of the Election Rules, 2017, according to which the delimitation of constituencies of an Assembly shall start from the Northern end of the District, or, as the case may be, the agency and then proceed clockwise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota. Hence, the requirement of law has been overlooked in the delimitation process done by the commission.

It is, therefore, respectfully prayed that by accepting the above said proposals of the petitioner, the necessary changes may be done the above said constituencies as per **paras "e to h" of grounds** of instant representation, in the best interest and welfare of the people of District Sheikhpura.

Raja Ijaz Hussain
Petitioner

Raja Ijaz Hussain

82/34A No 1

Through:-

Block code 199050503

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Cell No. 0300-8475086

Dated: 30.03.2018