BEFORE THE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

Muhammad Yaseen Amir son of Khuda Buksh, Member Provincial Assembly, PP-156, Lahore.

REPRESENTATION

UNDER SECTION 21(3) ELECTIONS ACT 2017 READ
WITH RULE 12 OF ELECTION RULES 2017 REGARDING
ALTERATIONS OR MODIFICATIONS IN THE PRELIMINARY
LIST OF CONSTITUTENCY PP 161 LAHORE XIX

Respectfully Sheweth;

1. That the petitioner is Member Provincial Assembly PP-156 Lahore and is a registered constituency. As voter of said per notification No. F8(3)/2018-Elc-I dated 5th March 2018, the whole constituency has been changed without the knowledge of the petitioner in preliminary report of list of constituencies of Provincial and Assembly, published by the National Election Commission of Pakistan.



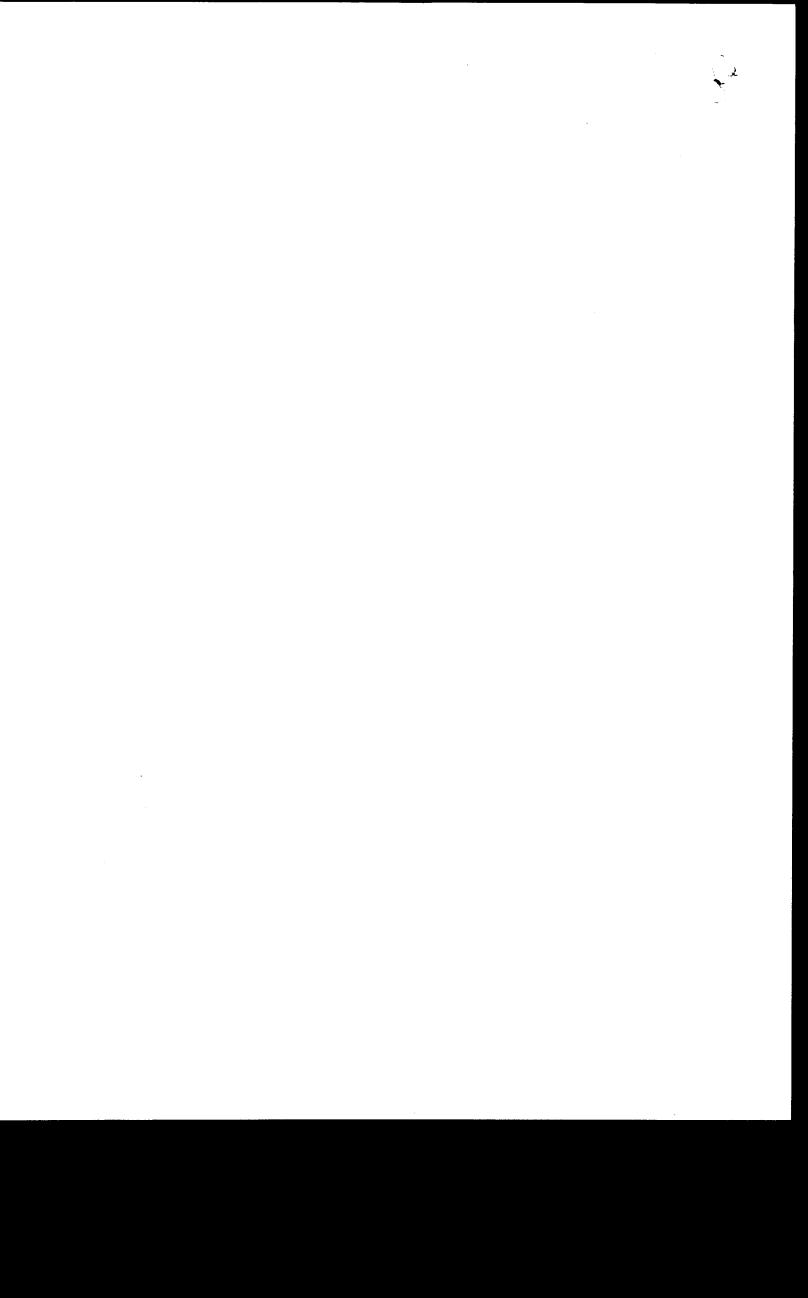
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That the undersigned is aggrieved by the new delimitation of Charge 4 Circle 6 nad 7 of Walton Cantonment Board (PP-161/NA-131) and seeks proposed delimitation in said constituency without bringing major changes in the constituency of Lahore District inter-alia on the following amongst other:-

2.

GROUNDS

- in preliminary report and preliminary
 list is against the provisions of
 section 20 of the Election Act, 2017
 read with rule 10 and 12 of Election
 Rules 2017.
- b. That the petitioner proposes the following changes in the delimitation:-



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- i. That Circle 6 and 7 of Charge 4

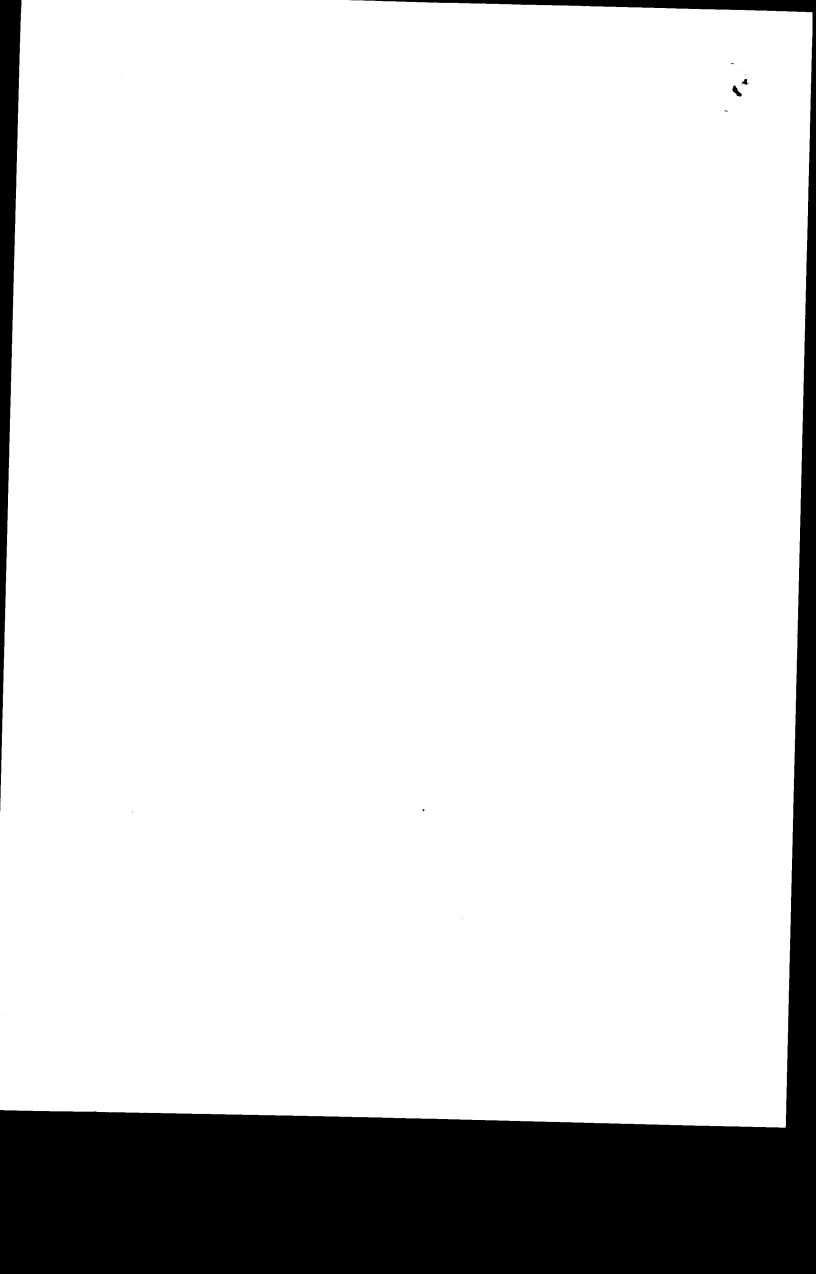
 of Walton Cantonment are not the

 part of its corresponding

 constituency i.e NA-131.
- That the above said Circle 6 and ii. 7 of Charge 4 of Walton Cantonment have unnaturally included in PP-161, despite the fact that a railway line exist comprising of boundary wall and fencing between the circle 6, 7 and main constituency of PP-161 due to which the voters would face hardship to cross the railway line as there is no excess to the area falling under the above said circles and the residents of both the areas have

no nexus with each other as there is no intervening access between both the areas.

- in between Circle 6, 7 and main constituency PP-161, so it will create hardship for the residents of both the areas to have any physical and geographical link with each other.
 - iv. That earlier since times in memorial, Circle 6 and 7 were the part of old PP-52/NA-126 and the new constituency PP-159/NA-130, which could not have been detatched from PP-159/NA-130 in



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a slipshod manner and included in NA-131.

- Charge 4 of Walton Cantonment are excluded from PP-161, in that case the population of PP-161 shall not be adversely affected and will remain in accordance with the quota of population for PP as prescribed by the ECP.
- features of Circle 6 and 7 with

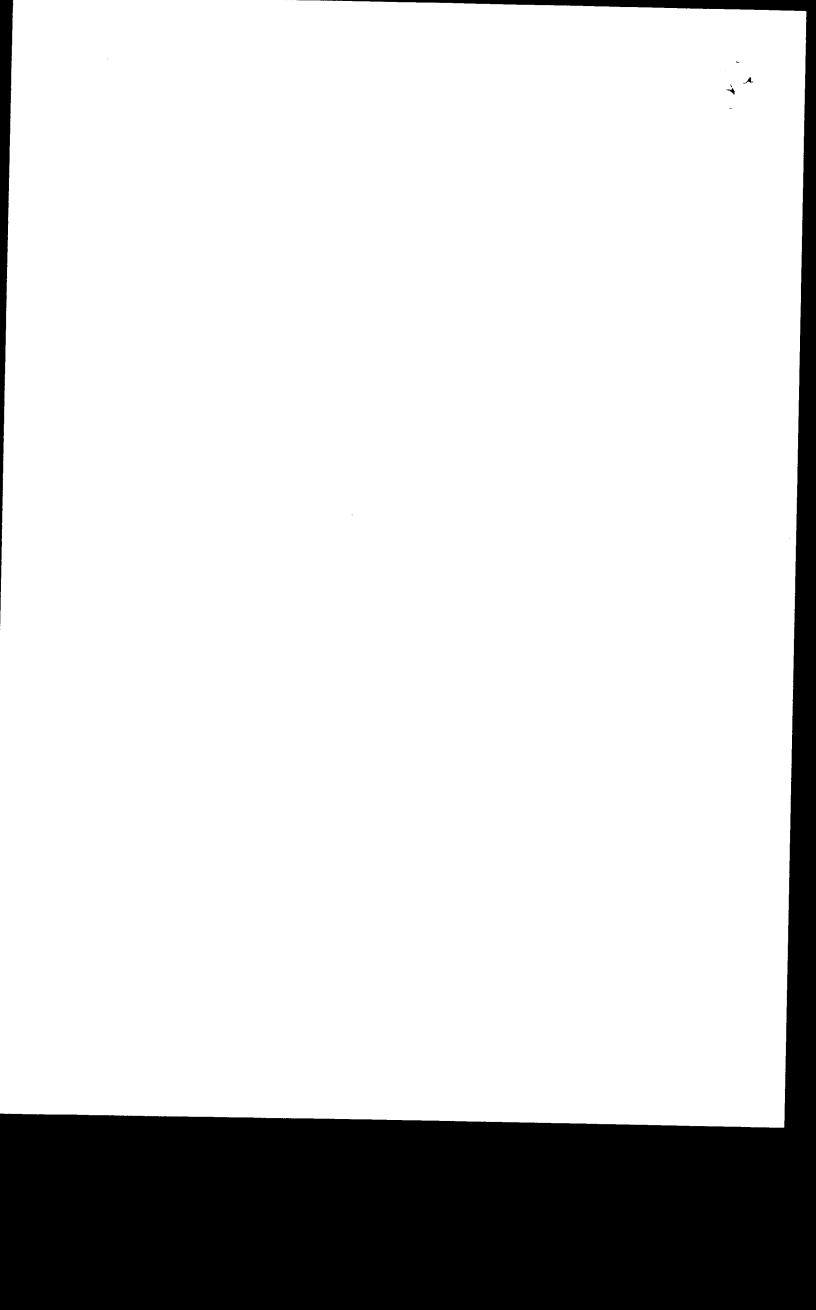
 PP-161 are unnatural, whereas

 the geographical adjustment of

 above Circles with PP-159 are

 quite natural and will not

 disturb the general plan.

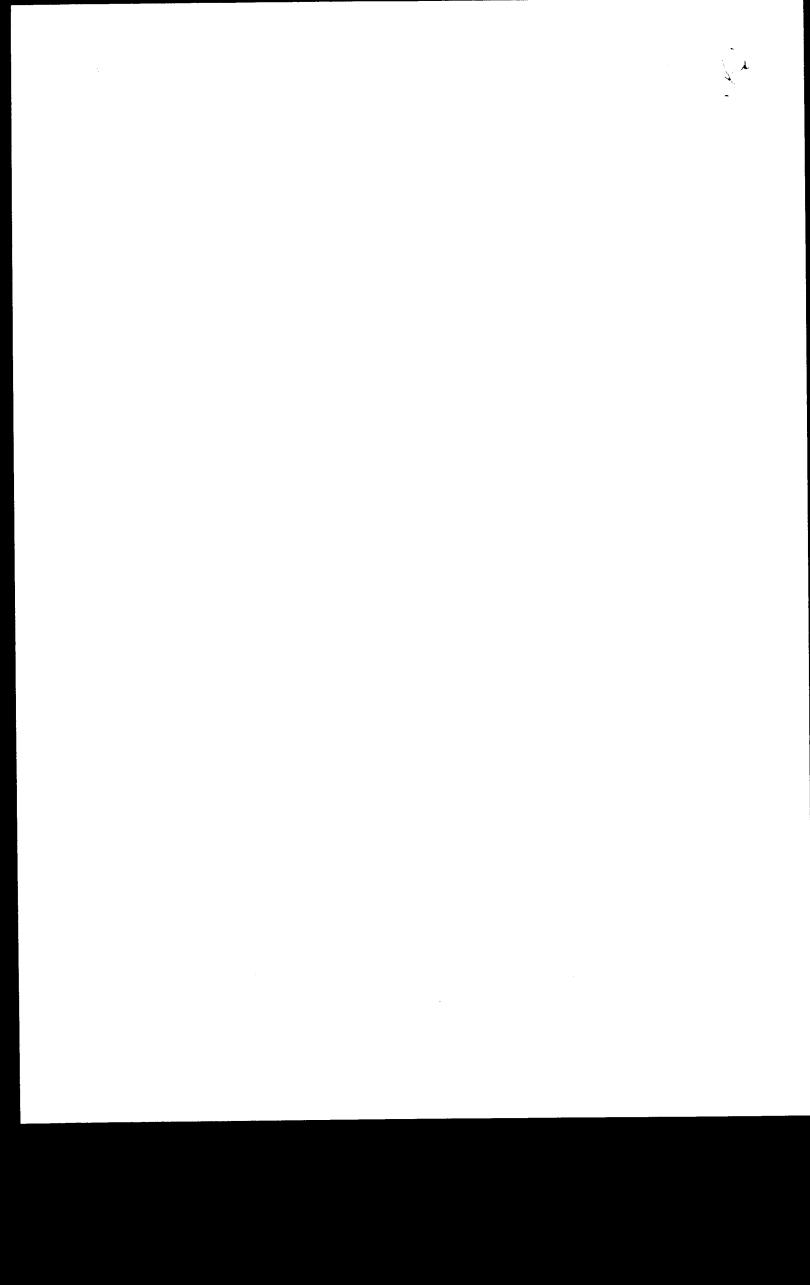


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vii. That the detachment of Circle 6
and 7 of Charge 4 Walton
Cantonment from PP-161 will
affect the quantum of population
required for any constituency.

will not prejudice the case of
any other voter of the
constituency rather it will
facilitate the voters of the
constituency to cast their vote
for conduct of free, fair and
impartial election.

ix. That it is in the interest of justice and also expedient for the conduct of free, fair and impartial elections that the proposed amendments be allowed



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and the new constituency be declared with the afore referred proposed amendments.

PRAYER

In view of the submissions made above, it is respectfully prayed that proposed alteration may kindly be accepted and the circles No. 6 and 7 of Charge 4 of Walton Cantonment may kindly be excluded from PP-161 and the same my be included in PP-159 and consequently, the same may kindly be published in the final list of the constituency.

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

Petitioner

Through

Muhammad Ramzan Ch.
Senior Advocate
Supreme Court of Pakistan
C.C No. PL.H-1479
Sohal Law Chambers,
7-Turner, Road, Lahore.

